

From: [Randall Hicks](#)
To: [Bratcher, Mike, EMNRD](#); "[Kristin Pope](#)"; [Patterson, Heather, EMNRD](#)
Cc: [jerry.fanning@dvn.com](#); [jeff.sawyer@dvn.com](#); "[Mark Hughes](#)"; [brian.kuh@dvn.com](#); [WBMiller@RockwaterEnergy.com](#); [Martin, Ed](#); "[Thomas McCormick](#)"; [Bratcher, Mike, EMNRD](#); "[Kristin Pope](#)"; [Patterson, Heather, EMNRD](#); [RONALD FROBEL](#)
Subject: RE: C-147 Recycling Registration: Devon - Hackberry 16
Date: Wednesday, April 08, 2015 11:52:55 AM
Attachments: C-147application-DevonHackberryRecyclingsmaller.pdf

Jim

I look forward to speaking with you and Gabe today after 2 pm. Based upon our short conversation today, we will

1. Withdraw the variance request to eliminate fencing. Instead, the AST areas will be fenced with gates, just like a tank battery. We understand the OCD concern regarding doing more than the stairwell chains, etc. to restrict human access to the ASTs
2. With respect to the side slope variance, you may wish to refer to the design drawings on pages 55-60 and the Frobels variance on pages 507 of 127 pages. If you need more information, we can get it to you pronto.
3. Pages 14-18 (of 127) provide the information regarding the freeboard variance. It has calculations relating to the Pinnacle tanks, which were designed to hold FRESH water. The Rockwater (Poseidon) tanks were designed to hold produced water. Page 81 of 127 has the following text showing the intent to hold produced water.

Geo Pad and Liner

- All tanks setups will require the use of a Rockwater approved underlayment and liner. Typically one 10 ounce, geo pad is laid out for added protection and one, 30 mil liner will be placed inside the tank.
 - In the event that the tank will be holding produced or recycled water, an extra felt liner (geo pad) should be laid out prior to the AST setup.
 - Check customer specifications and regulatory permit liner and containment requirements for ASTs that may hold flowback or produced water.
4. I think you have what you need regarding the variance relating to the primary liner system of two 30-mil LLDPE in lieu of one 45-mil LLDPE-R.

Thanks for the call

Randall Hicks
RT Hicks Consultants
Office: 505-266-5004
Cell: 505-238-9515

From: Randall Hicks [mailto:rthicks@swcp.com]
Sent: Thursday, April 02, 2015 6:47 AM
To: 'Bratcher, Mike, EMNRD'; 'Kristin Pope'; 'Patterson, Heather, EMNRD'
Cc: 'Randy Hicks'; [jerry.fanning@dvn.com](#); [jeff.sawyer@dvn.com](#); 'Mark Hughes'; [brian.kuh@dvn.com](#); [WBMiller@RockwaterEnergy.com](#); 'Martin, Ed'; 'Thomas McCormick'
Subject: RE: C-147 Recycling Registration: Devon - Hackberry 16

Mike

Hard copy will be at your door today. Aztec office has the same block but apparently Santa Fe Office of OCD and SLO does not.

We will transmit email attachments in pdf format to you shortly.

Randall T. Hicks
505-266-5004 (office)
505-238-9515 (cell and best number to use)

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Thursday, April 02, 2015 6:41 AM
To: Kristin Pope; Patterson, Heather, EMNRD
Cc: Randy Hicks; jerry.fanning@dv.com; jeff.sawyer@dv.com; Mark Hughes; brian.kuh@dv.com; WBMiller@RockwaterEnergy.com; Martin, Ed; 'Thomas McCormick'
Subject: RE: C-147 Recycling Registration: Devon - Hackberry 16

Kristin,

Your link is blocked on this system. I appreciate the hard copy submittal, but will need an electronic version as well. Please send via conventional email.

Thanks,

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

From: Kristin Pope [<mailto:kristin@rthicksconsult.com>]
Sent: Wednesday, April 01, 2015 5:26 PM
To: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD
Cc: Randy Hicks; jerry.fanning@dv.com; jeff.sawyer@dv.com; Mark Hughes; brian.kuh@dv.com; WBMiller@RockwaterEnergy.com; Martin, Ed; 'Thomas McCormick'
Subject: C-147 Recycling Registration: Devon - Hackberry 16

Ms. Patterson and Mr. Bratcher:

Please follow the link below to access the Hackberry 16 Recycling Containments and Facility registration submitted on behalf of Devon Energy.

C-147application-DevonHackberryRecycling.pdf
<https://rthicks.egnyte.com/dl/5SaKUXitul>

Please note the following:

- A variance request to use two 30-mil LLDPE liners instead of one 45-mil as the primary liner is included.
- We also include other variances previously approved by OCD under Rule 17
- This transmission is copied to Ed Martin of the SLO as notification of the surface owner is required by the Rule.

Bryan Printers will deliver one (1) paper copy of the submission on Thursday. Please let me know if I can assist your review of the variance request in any way. Thank you.

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755