



2500 North Eleventh Street □ Enid, OK 73701 □ (580) 234-8780 □ Fax (580) 237-4302 □ [www.envirotechconsulting.com](http://www.envirotechconsulting.com)

August 21, 2017

Tomas Oberding, PhD  
New Mexico EMNRD  
Oil conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

RE: Rule 34 Variance Request – Todd 2 Produced Water Recycling Containment

Dr. Oberding:

Devon is requesting a variance to rule 34 part 12(A)(4) requiring secondary liners to be 30-mil string reinforced LLDPE. Devon is requesting approval to use 40-mil LLDPE in place of the specified material. Based on our experience, we feel that the requested material will allow us to provide greater environmental protection in our impoundments.

Due to the construction of the 30-mil reinforced LLDPE material, nondestructive QA/QC testing cannot be performed. The proposed 40-mil LLDPE will be seamed in a manner that will allow nondestructive pressure testing of the seams to ensure proper sealing.

The proposed LLDPE is appropriate material for the proposed use in the impoundment, and is compatible with the material that will be stored. This material will provide equal or better environmental protection as the specified 30-mil reinforced LLDPE. Attached with this request is a sample specification sheet for the LLDPE with the proposed material highlighted.

The proposed new liner system cross-section is as follows: prepare subgrade, 12 oz. geotextile, 40-mil LLDPE, single sided geocomposite, 60-mil HDPE (smooth on bottom, textured on slopes). This will replace the cross-section required by the current rule and submitted with the original permit application. It should also be noted that this variance has been granted on past Devon sites, specifically the Hackberry Treated Water Impoundment constructed in 2015.

Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at [jstallings@envirotechconsulting.com](mailto:jstallings@envirotechconsulting.com) at your convenience

Thank you for your consideration.  
Best regards,

**ENVIROTECH ENGINEERING & CONSULTING, INC.**

A handwritten signature in black ink, appearing to read "Jimmy Stallings", is written over a light blue circular stamp.

Jimmy Stallings, P.E.  
President and Principal Engineer