

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, November 25, 2020 11:02 AM
To: 'r@rthicksconsult.com'; 'Michael Incerto'; Bratcher, Mike, EMNRD
Cc: 'Alyssa McGuire'; 'todd.carpenter@solarismidstream.com'
Subject: RE: [EXT] FW: Solaris Water Midstream - Rodney Robinson AST Containment

1RF-457 – RODNEY ROBINSON ABOVE-GROUND STORAGE TANK

Mr. Hicks,

OCD is reviewing Solaris Water Midstream, application and form C-147 for the proposed Rodney Robinson Above-Ground Storage Tank received on September 30, 2020. The application has been assigned an OCD Administrative Order number 1RF-457. The application is not administratively complete. To continue reviewing this application, please submit the cost closure estimate and financial assurance documents, required by 19.15.34.15 NMAC for the proposed facility.

Thanks in advance for your assistance.

Regards,

Victoria Venegas • Engineering Tech. III
Environmental Bureau
EMNRD - Oil Conservation Division
811S. First St. | Artesia, NM 88210
(575) 909-0269 | Victoria.Venegas@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: r@rthicksconsult.com <r@rthicksconsult.com>
Sent: Wednesday, November 18, 2020 4:10 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: 'Michael Incerto' <Michael.Incerto@solarismidstream.com>; 'Alyssa McGuire' <Alyssa.McGuire@solarismidstream.com>
Subject: [EXT] FW: Solaris Water Midstream - Rodney Robinson AST Containment

Ms. Venegas

We understand that you are now the point person to deal with this submission, which was originally transmitted on 9/30/20. According to the OCD Environmental Bureau, this AST Containment C-147 is a permit and not a registration. Except for one (see below), all requested variances in this submission to cause an AST Containment to comply with the Rule were recently approved by OCD for the ConocoPhillips Zia Hills AST Containment (see

http://ocdimage.emnrd.state.nm.us/Imaging/FileStore/santafeenvironmental/ao/20201030/psl2029048811_10_30_2020_12_16_46.pdf).

I believe we have a bond already on file with OCD that will suit this site – and I will chase it down and provide an update to you.

As these documents were submitted to OCD.Enviro@state.nm.us on September 30, 2020, they should be in the queue. I believe BLM has approved this facility on their surface and Solaris needs to begin recycling produced water by December 28th – or fresh water must be employed for well stimulation.

Solaris understands that OCD has not approved the variance for an AST to hold fluids with 2-feet of freeboard. They will comply with the Rule and maintain a 3-foot freeboard

We thank you in advance for your attention to this matter.

Randall Hicks, PG
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901 Rio Grande Blvd. NW
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Albuquerque, NM 87104

From: r@rthicksconsult.com <r@rthicksconsult.com>

Sent: Wednesday, September 30, 2020 4:01 PM

To: 'LucasKamat, Susan, EMNRD' <Susan.LucasKamat@state.nm.us>; 'Enviro, OCD, EMNRD' <OCD.Enviro@state.nm.us>

Cc: 'Michael Incerto' <Michael.Incerto@solarismidstream.com>; 'Alyssa McGuire' <Alyssa.McGuire@solarismidstream.com>; 'todd.carpenter@solarismidstream.com' <todd.carpenter@solarismidstream.com>

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Ms. Lucas Kamat

Attached are Volumes 1 and 2 of the complete C-147 Package for the above-referenced containment.

Solaris Water Midstream will transmit this package to the BLM, as stated in the cover letter.

When the contractor begins pad construction for the AST, we will solicit a bid to reclaim the site to Rule 34 mandates. We have data to include with the cost estimate on removal of the AST and sampling. Expect the cost estimate in a few weeks or so and at that time I will provide a date when we expect to need to use the AST for produced water.

Thanks

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