

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Monday, March 1, 2021 11:19 AM
To: Visairo, Omar
Cc: Rardin, James Earl; Barnes, Calvin C; Jones, Cullen M; Shi, Wei; Vallejo, Tony
Subject: RE: Salado Draw 1RF-11 (Section 23 RWCS, North Cell) Leak Detected

Good morning Mr. Visairo,

Thank you for the notification. There isn't a specific due date to repair the liner. The rule Part 34 just references:

- (4) If the containment's primary liner is compromised above the fluid's surface, the operator shall repair the damage or initiate replacement of the primary liner within 48 hours of discovery or seek an extension of time from the division district office.
- (5) If the primary liner is compromised below the fluid's surface, the operator shall remove all fluid above the damage or leak within 48 hours of discovery, notify the division district office and repair the damage or replace the primary liner.

The requested variance for an extension to remove all fluids from the containment until March 1, 2021 for **1RF-11 Salado Draw Section 23 Recycling Facility and Containment** is approved.

A copy of this electronic communication will be saved in the electronic file on OCD Imaging at:
: <https://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pTO1706148913>

Regards,

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From: Visairo, Omar <Omar.Visairo@chevron.com>
Sent: Friday, February 26, 2021 7:47 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Rardin, James Earl <JRAJ@chevron.com>; Barnes, Calvin C <Calvin.Barnes@chevron.com>; Jones, Cullen M <CullenJones@chevron.com>; Shi, Wei <Wei.Shi@chevron.com>; Vallejo, Tony <JVallejo@chevron.com>
Subject: [EXT] Salado Draw 1RF-11 (Section 23 RWCS, North Cell) Leak Detected

Miss Venegas,

This is to inform you that earlier this afternoon our Production Specialist reported that the leak detection sump on the Salado Draw 23 North RWCS had not pumped off after two days of pumping, which indicates a leak through the primary liner. The pond currently has about 166,000 bbls of approximately 4,000 ppm TDS water and we have a water transfer company set up to rig up tomorrow and transfer the water out of the 23N and into the 23S pond. Transferring at 60

bpm, it will take about 48 hours to transfer the water (we plan to remove it all since the leak depth is unknown). Also, given that the regulations dictate that the water must be removed above the leak within 48 hours of discovery, we'd like to request an extension on that just based on the availability of our vendor and the practical rate for a pond-to-pond transfer. Please let us know if you can grant an extension until 3/1/21 in the afternoon.

Additionally, we didn't see any timing restrictions on the actual liner repair. Although we plan to start as soon as the pond is empty, please let us know if there's a timeline on that we need to keep in mind.

And finally, as this pond is currently under a variance due to no frac activity in the area, we think that it's a good idea once the liner is patched up to follow the "10% refilling procedure" that the COA's dictate to bring the pond out of the variance (not for the purpose of bringing it out of the variance, but just to take the opportunity to test the liner all the way to max capacity (314,308 bbls at 3' of freeboard)).

Thanks,

Omar Visairo
Water Operations Supervisor
575-263-1246

