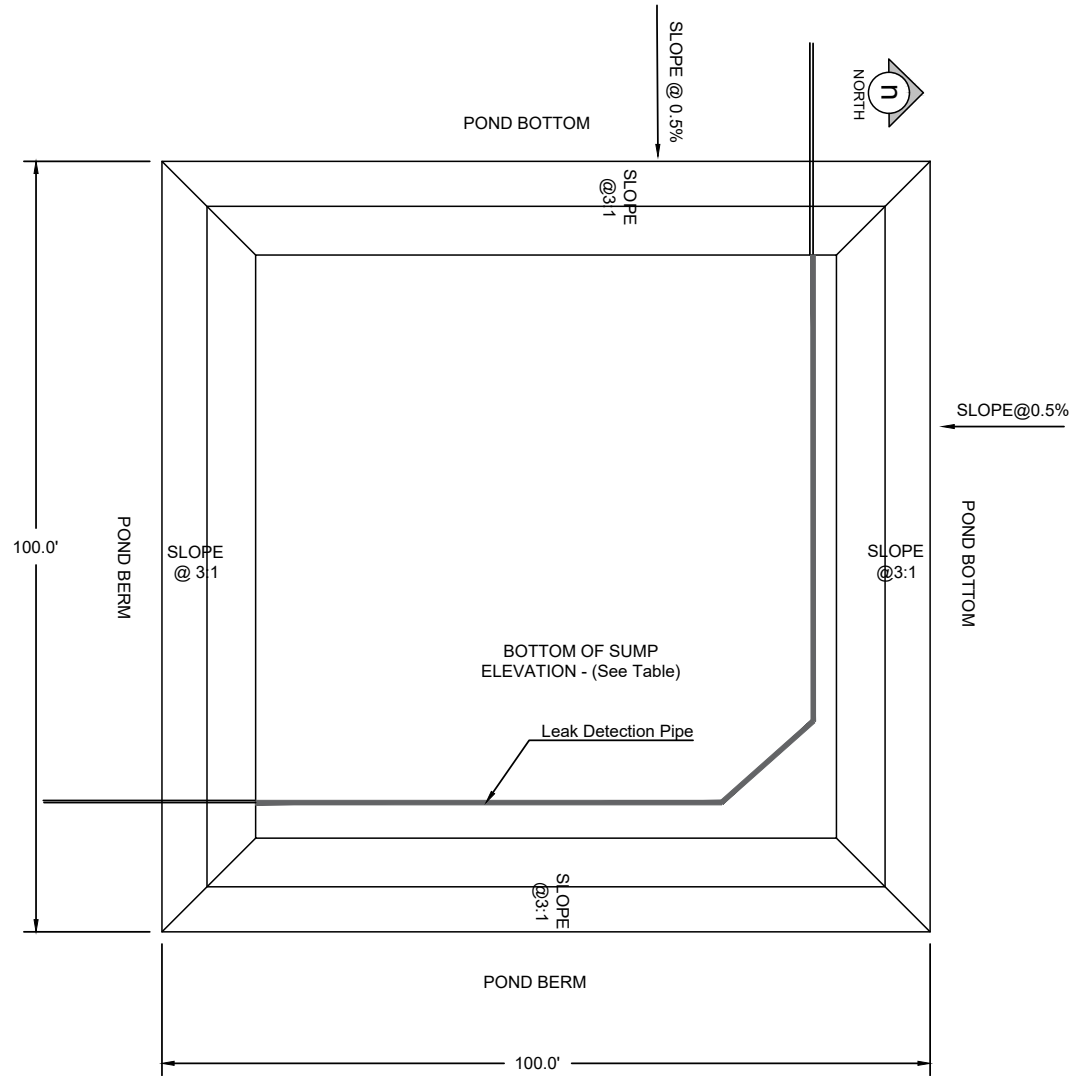


1RF-463 Javelina Facility

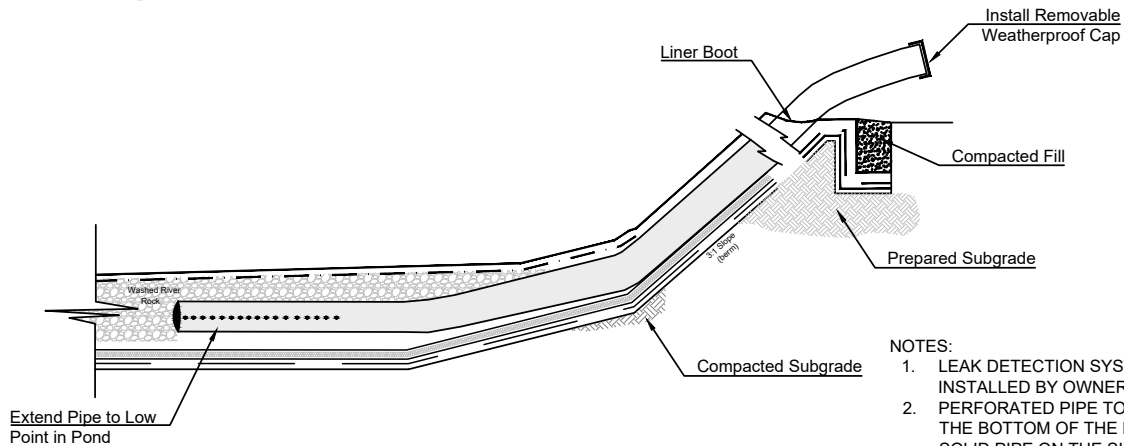
**OWL SWD OPERATING, LLC
[308339]**

Correspondence/Clarifications

March 30, 2021



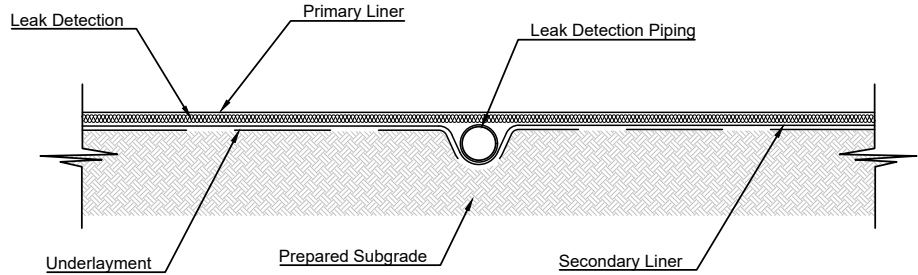
POND SUMP PLAN VIEW
Not to Scale



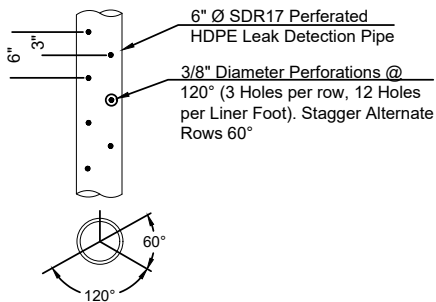
LEAK DETECTION/SAMPLING SYSTEM DETAIL
Not to Scale

REFERENCE TABLE	
DETAIL	DESCRIPTION
PRIMARY LINER	60 mil HDPE TEXTURED LINER
LEAK DETECTION	200 mil GEONET
SECONDARY LINER	40 mil LLDPE LINER
UNDERLAYMENT	8 oz GEOTEXTILE
LEAK DETECTION PIPING	6-in 0 SDR17 PREFERATED HDPE PIPE
SUMP	3256.5-ft ELEVATION W/ 3:1 SLOPE

- NOTES:
1. LEAK DETECTION SYSTEM TO BE INSTALLED BY OWNER.
 2. PERFORATED PIPE TO BE ALONG THE BOTTOM OF THE POND. SOLID PIPE ON THE SIDE SLOPE.
 3. CONSTRUCT COMPACTED SUBGRADE TO 95% STANDARD PROCTOR AS PER ASTM D-698.
 4. EXTEND 60 MIL. RUB SHEET 1.0-FT PAST TOP OF SHOULDER OF SUMP.
 5. WASH RIVER ROCK SHALL BE 3/8" MIN. & 3/4" MAX.



LEAK DETECTION PIPE DETAIL
Not to Scale



PERFORATED PIPE DETAIL
Not to Scale

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NO.	DATE	REVISION	BY	CHKD



Venegas, Victoria, EMNRD

From: Tyler Williams <twilliams@envirotechconsulting.com>
Sent: Tuesday, March 30, 2021 1:03 PM
To: Venegas, Victoria, EMNRD; Willie Garcia; Mitchell Ratke
Subject: [EXT] RE: Javelina Facility AST. Leak detection system
Attachments: Sheet 7- Sump Plan 3.30.2021.pdf

Ms. Venegas,

Please see the attached Sheet 7. The table has been updated to accurately reflect the leak detection as 200-mil geonet. The washed river rock is only located in the sump as annual space for additional liquid to collect and be of sufficient quantity to pump up the leak detection pipe.
Let me know if this clarification is sufficient.

Tyler Williams, P.E.
President



2500 N. 11th, ENID, OK 73701
580.234.8780/FAX 580.237.4302/CELL 580.977.9314
<http://www.envirotechconsulting.com>

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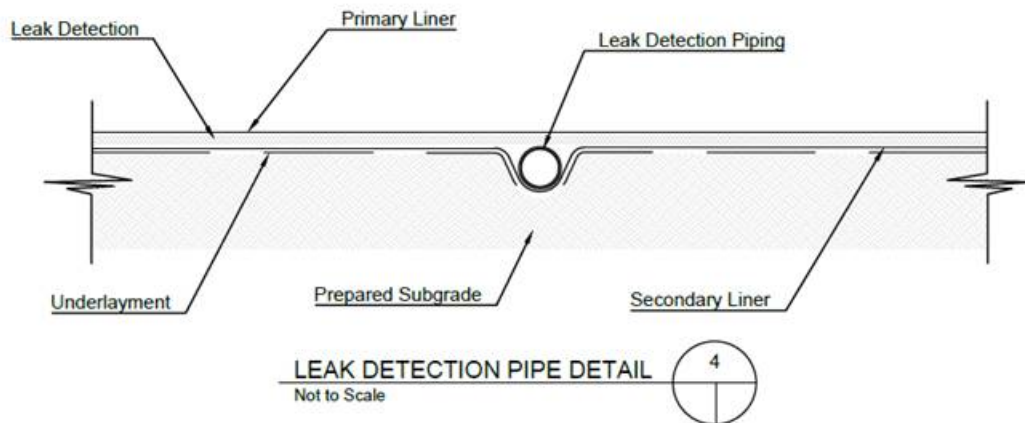
From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Tuesday, March 30, 2021 11:58 AM
To: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>; Tyler Williams <twilliams@envirotechconsulting.com>
Subject: RE: Javelina Facility AST. Leak detection system

All,

Per 19.15.34.12.A.(7) **DESIGN AND CONSTRUCTION SPECIFICATIONS FOR A RECYCLING CONTAINMENT:**

(7) The operator of a recycling containment shall place a leak detection system between the upper and lower geomembrane liners that shall consist of 200-mil geonet or two feet of compacted soil with a saturated hydraulic conductivity of 1×10^{-5} cm/sec or greater to facilitate drainage. The leak detection system shall consist of a properly designed drainage and collection and removal system placed above the lower geomembrane liner in depressions and sloped to facilitate the earliest possible leak detection.

Question: In the proposed design, page 84, is the river washed rock layer two feet thick with the required saturated hydraulic conductivity? Could you provide a drawing that clarifies those details, please? Thanks,



Victoria Venegas • Environmental Specialist

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/>



From: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>

Sent: Saturday, March 27, 2021 8:25 AM

To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Subject: [EXT] RE: Javelina Facility AST

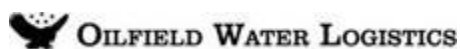
Ms. Venegas,

Please find attached the revised C147. This is only a reference of the document that I uploaded onto the E-Permitting page. Please let me know if you have any questions or need anything additionally.

Have a good weekend!

Willie Garcia

Surface Landman II



200 North Loraine St., Suite 206

Midland, Texas 79701

[432.488.6061](tel:432.488.6061) | cell

[432.242.8991](tel:432.242.8991) ext. 251 | office

wgarcia@oilfieldwaterlogistics.com

From: Venegas, Victoria, EMNRD [<mailto:Victoria.Venegas@state.nm.us>]
Sent: Friday, March 26, 2021 9:54 AM
To: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Subject: RE: Javelina Facility AST

Good morning Mr. Garcia,

The submitted C-147s do not include OWL's OGRID number. Can you correct the C-147s and update the application on the submission portal? I don't have access to operator's portal, so I'm not sure if you can replace a submitted document. If that is possible, please do it. I cannot approved an application if we don't have a complete C-147. Also please complete the liner system description on Form C-147 for the AST. I apologize for this oversight In my first email.

1.	Operator: <u>Oilfield Water Logistics</u> (For multiple operators attach page with information) OGRID #: _____ Address: <u>8201 Preston Rd Suite 520 Dallas TX 75225</u> Facility or well name (include API# if associated with a well): <u>Javelina Facility AST</u> OCD Permit Number: _____ (For new facilities the permit number will be assigned by the district office) U/L or Qtr/Qtr <u>E1/2 pf NE1/4</u> Section <u>18</u> Township <u>26 South</u> Range <u>35 East</u> County: <u>Lea County</u> Surface Owner: <input checked="" type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Private <input type="checkbox"/> Tribal Trust or Indian Allotment
2.	<input checked="" type="checkbox"/> Recycling Facility: Location of recycling facility (if applicable): Latitude <u>32.048956°</u> Longitude <u>-103.401212°</u> NAD83 Proposed Use: <input type="checkbox"/> Drilling* <input checked="" type="checkbox"/> Completion* <input type="checkbox"/> Production* <input type="checkbox"/> Plugging* <i>*The re-use of produced water may NOT be used until fresh water zones are cased and cemented</i> <input type="checkbox"/> Other, requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water. <input checked="" type="checkbox"/> Fluid Storage <input checked="" type="checkbox"/> Above ground tanks <input checked="" type="checkbox"/> Recycling containment <input type="checkbox"/> Activity permitted under 19.15.17 NMAC explain type _____ <input type="checkbox"/> Activity permitted under 19.15.36 NMAC explain type: _____ <input type="checkbox"/> Other explain _____ <input type="checkbox"/> For multiple or additional recycling containments, attach design and location information of each containment <input type="checkbox"/> Closure Report (required within 60 days of closure completion): <input type="checkbox"/> Recycling Facility Closure Completion Date: _____
3.	<input checked="" type="checkbox"/> Recycling Containment: <input type="checkbox"/> Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year) Center of Recycling Containment (if applicable): Latitude _____ Longitude _____ NAD83 <input type="checkbox"/> For multiple or additional recycling containments, attach design and location information of each containment <input type="checkbox"/> Lined <input type="checkbox"/> Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____ <input type="checkbox"/> String-Reinforced Liner Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: <u>48,000</u> bbl Dimensions: L _____ x W _____ x D _____ <input type="checkbox"/> Recycling Containment Closure Completion Date: _____

Regards,

Victoria Venegas • Environmental Specialist
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/>



2500 North Eleventh Street • Enid, OK 73701 • (580) 234-8780 • Fax (580) 237-4302 • www.envirotechconsulting.com

March 22, 2021

Ms. Victoria Venegas
New Mexico EMNRD
Oil conservation Division
811 S. First St.
Artesia, New Mexico 88210

RE: ***Response to comments regarding Javelina AST***

Ms. Venegas:

Attached is an updated C-147 application for the OWL Javelina Facility. The following issues have been addressed.

AST engineering drawings and liner specs
PDF page 27-38 & 87

Slope and Trench Variance request
PDF page 26

Also, the facility O&M plan and closure plan have been updated to include the AST
PDF page 137-141 and 142-145 respectively

Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at mratke@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 'M. Ratke', is written over a light blue horizontal line.

Mitchell Ratke, EIT
Project Engineer



From: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Sent: Tuesday, March 23, 2021 12:34 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXT] RE: Javelina Facility AST

Good afternoon Victoria,

I wanted to let you know that have uploaded the attached information onto the OCD E-PERMITTING page. If you should have any issues with the attached information please do not hesitate contacting me.

Thanks again for assistance and patience.

Willie Garcia
Surface Landman II

 OILFIELD WATER LOGISTICS
200 North Loraine St., Suite 206
Midland, Texas 79701
[432.488.6061](tel:432.488.6061) | cell
[432.242.8991](tel:432.242.8991) ext. 251 | office
wgarcia@oilfieldwaterlogistics.com

From: Venegas, Victoria, EMNRD [<mailto:Victoria.Venegas@state.nm.us>]
Sent: Thursday, March 18, 2021 12:40 PM
To: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Subject: RE: Javelina Facility AST

Mr. Garcia,

Thanks for your quick response. Unfortunately, I will have to reject the application. Please resubmit the entire package and let me know.

Regards,

Victoria Venegas • Environmental Specialist
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/>



From: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Sent: Thursday, March 18, 2021 11:27 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXT] RE: Javelina Facility AST

Victoria,

We are having the engineering group work on this. Once we have the requested information I will submit.

Thank you for the assistance!

Willie

From: Venegas, Victoria, EMNRD [<mailto:Victoria.Venegas@state.nm.us>]
Sent: Thursday, March 18, 2021 11:54 AM
To: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Subject: RE: Javelina Facility AST

Good morning Mr. Garcia,

That is the document I have in the system. That document does not include any information for the AST.

I cannot process this application any further without the information regarding the AST. Follow the links below to find examples of facilities that include ASTs and have been approved by the Division.

<https://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pVV2032839502>

<https://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pSL2029048811>

Let me know if you have any other questions.

Regards,

Victoria Venegas • Environmental Specialist
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/>



From: Willie Garcia <wgarcia@oilfieldwaterlogistics.com>
Sent: Thursday, March 18, 2021 8:38 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXT] FW: Javelina Facility AST

Victoria,

The attached should have been what was submitted as a completed package. Can you let me know if this is what you are viewing on your end? If not, I will need to go back in to resubmit.

Thanks,

Willie Garcia
Surface Landman II

 **OILFIELD WATER LOGISTICS**
200 North Loraine St., Suite 206
Midland, Texas 79701
[432.488.6061](tel:432.488.6061) | cell
[432.242.8991](tel:432.242.8991) ext. 251 | office
wgarcia@oilfieldwaterlogistics.com

From: Willie Garcia
Sent: Thursday, March 18, 2021 9:06 AM
To: Victoria.Venegas@state.nm.us
Subject: FW: Javelina Facility AST

Victoria,

Could you please give me a call to discuss the incomplete information for the Javelina Facility. You can reach me on my cell number below.

Thank you,

Willie Garcia
Surface Landman II

 **OILFIELD WATER LOGISTICS**
200 North Loraine St., Suite 206
Midland, Texas 79701
[432.488.6061](tel:432.488.6061) | cell
[432.242.8991](tel:432.242.8991) ext. 251 | office
wgarcia@oilfieldwaterlogistics.com

From: Mary Mesh
Sent: Thursday, March 18, 2021 8:26 AM
To: Nick Hines <nhines@oilfieldwaterlogistics.com>; Jeffrey Sawyer <jsawyer@oilfieldwaterlogistics.com>; Willie Garcia

<wgarcia@oilfieldwaterlogistics.com>

Subject: RE: Javelina Facility AST

Nick – I am adding Willie to this, since he submitted the application.

Regards,

Mary

Mary Mesh

Engineering Technician



OILFIELD WATER LOGISTICS

8201 Preston Rd. Suite 520

Dallas, Texas 75225

214.676.3916 | cell

214.292.2011 ext. 213 | office

mmesh@oilfieldwaterlogistics.com

From: Nick Hines <nhines@oilfieldwaterlogistics.com>

Sent: Thursday, March 18, 2021 8:24 AM

To: Jeffrey Sawyer <jsawyer@oilfieldwaterlogistics.com>; Mary Mesh <mmesh@oilfieldwaterlogistics.com>

Subject: Fwd: Javelina Facility AST

Sent from my iPhone

Begin forwarded message:

From: "Venegas, Victoria, EMNRD" <Victoria.Venegas@state.nm.us>

Date: March 17, 2021 at 12:06:34 PM CDT

To: Nick Hines <nhines@oilfieldwaterlogistics.com>, twilliams@envirotechconsulting.com

Subject: Javelina Facility AST

Javelina Facility AST

All,

NMOCD is reviewing the permit application submitted by [308339] OWL SWD OPERATING, LLC for the proposed Javelina Facility AST in A-18-26S-35E, Lea County, NM. The application includes two (2) inground containments and one (1) AST. However, the application does not have engineering drawings, liner specifications, and slope and trench variances requests for the AST. The application does not include AST's O&M plan and the closure plan. Could you clarify, please? If it was transmitted separately, please let me know.

Thanks,

Victoria Venegas • Environmental Specialist

Environmental Bureau

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(575) 909-0269 | Victoria.Venegas@state.nm.us

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