

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Tuesday, February 2, 2021 1:55 PM
To: David Roybal, PE; Bratcher, Mike, EMNRD; Todd Roberson
Cc: Juan Dominguez; Pettigrew, Randy; Monte Bell
Subject: 2RF-154 - Longfellow Energy Impound 24 Recycling Containment. Approved with conditions.

2RF-154 - Longfellow Energy Impound 24 Recycling Containment. Conditions of approval.

Mr. Roybal,

The New Mexico Oil Conservation Division has reviewed the recycling containment permit application and related documents, submitted by LONGFELLOW ENERGY, LP [372210] on November 2, 2020, for the proposed **Longfellow Energy Impound 24 Recycling Containment** in Unit Letter D, Section 24, T-17S, R-28E, in Eddy County, New Mexico. The application has been assigned the OCD Administrative Order number **2RF-154**.

LONGFELLOW ENERGY, LP requested variances from 19.15.34 NMAC for the proposed 2RF-154 - Longfellow Energy Impound 24 Recycling Containment, related to 19.15.34. NMAC.

The following variances have been approved:

- The variance to 19.15.34.12 A (4) NMAC for the installation on the earthen containment of a 40-mil HDPE as a secondary liner is approved.
- The variance from 19.15.34.13.D NMAC, for the installation of a chain link fence, six feet in height with a minimum of three strands of barbed wire over the top of the chain link in lieu of a 4-strand barbed wire fence, is approved.
- The variance from 19.15.34.13.E NMAC for the installation of an audible bird deterrence system, "Mega-Blaster Pro", is approved.

The form C-147 and related documents for the proposed 2RF-154 - Longfellow Energy Impound 24 Recycling Containment, is approved with the following conditions of approval:

- LONGFELLOW ENERGY, LP, shall construct, operate, maintain, close, and reclaim the 2RF-154 Longfellow Energy Impound 24 Recycling Containment in compliance with 19.15.34 NMAC.
- The 2RF-154 - Longfellow Energy Impound 24 Recycling Containment is approved for five (5) years of operation from the date of permit application. 2RF-154 - Longfellow Energy Impound 24 Recycling Containment permit expires on November 2, 2025. If LONGFELLOW ENERGY, LP wishes to extend operations past five (5) years, an annual permit extension request must be submitted using an OCD form C-147 through the [OCD Online](#) system by October 2, 2025.
- LONGFELLOW ENERGY, LP cannot receive produced water in the 2RF-154 - Longfellow Energy Impound 24 Recycling Containment until after the original copy of the financial assurance has been accepted by OCD. Per Rule 19.15.34.15.A.(1) operators without existing financial assurance pursuant to 19.15.8 NMAC shall furnish financial assurance acceptable to the division in the amount of the recycling containment's estimated closure cost provided in form C-147. The financial assurance bond should be mailed to the Oil Conservation Division; ATTN: Eva Mathes, Bonding and Compliance; 1220 South St Frances Drive; Santa Fe, NM 87505. OCD will notify you when the bond has been received and approved. For your upcoming bonding needs, please see our online bond forms: <http://www.emnrd.state.nm.us/OCD/forms.html>
- LONGFELLOW ENERGY, LP shall notify OCD when recycling operations commence and cease at the 2RF-154 - Longfellow Energy Impound 24 Recycling Containment.
- A minimum of 3-foot freeboard must be maintained in the recycling containment, at all times during operations.

- If less than 20% of the total fluid capacity is utilized every six months, beginning from the first withdrawal, operation of the facility is considered ceased and notification of cessation of operations should be sent electronically to OCD.Enviro@state.nm.us. An extension to extend the cessation of operation, not to exceed six months, may be submitted using a C-147 form through the [OCD Online](#) system.
- LONGFELLOW ENERGY, LP shall submit monthly reports of recycling and reuse of produced water, drilling fluids, and liquid oil field waste on via OCD form C-148 through the [OCD Online](#) system.
- LONGFELLOW ENERGY, LP shall comply with 19.15.29 NMAC Releases in the event of any release of produced water or other oil field wastes at 2RF-154 - Longfellow Energy Impound 24 Recycling Containmentment.

Please reference number **2RF-154** in all future communications related to Longfellow Energy Impound 24 Recycling Containmentment.

Please keep a copy of this electronic communication for your files, as no paper copy of the approval will be delivered. A copy of this electronic communication will be saved in **2RF-154** electronic file on OCD Imaging at:

<https://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pVV2103332448>

Finally, please note that as of December 9th, 2020, the Oil Conservation Division announced the first phase of an ongoing paperless initiative project, with the launch of new online submission forms in the OCD Online system. All non-fee type applications, including Form C-147 and all related documents and Form C-148, must be submitted via [OCD Online](#) system. For any questions regarding the updated system, contact OCD.Fees@state.nm.us.

Please let me know if you have any further questions or concerns,

Regards,

Victoria Venegas • Environmental Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

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