

**From:** [Bratcher, Mike, EMNRD](#)  
**To:** [John Farrell](#); [Hamlet, Robert, EMNRD](#); ["Amos, James A"](#); [blm\\_nm\\_cfo\\_spill@blm.gov](mailto:blm_nm_cfo_spill@blm.gov); [Eads, Cristina, EMNRD](#)  
**Cc:** ["Todd Roberson"](#); ["Clay Tipton"](#); ["Josh Halcomb"](#); [dan@trinityoilfieldservices.com](mailto:dan@trinityoilfieldservices.com); ["Robbie Runnels"](#)  
**Subject:** RE: [EXT] NAPP2102039553, Coordinates 32.209471 N, -104 222315 - Release at Mewbourne Oil Company Archduke 19 W2AP Federal 001H  
**Date:** Wednesday, February 10, 2021 4:59:00 PM

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John,

There is not enough information/data to review this plan. If Mewbourne chooses to move forward with the project, it will be "at risk", which is allowed under current OCD rules (please review the relevant portion of 19.15.29 [NMAC] for specifics). With that said, I very strongly recommend that whatever steps necessary be taken to prevent any part of this release from entering the Black River. I can't emphasize enough, the importance of not allowing that to happen.

Thank you,

Mike Bratcher  
NMOCD NM South  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108  
575-626-0857 Cell

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**From:** John Farrell <[john@trinityoilfieldservices.com](mailto:john@trinityoilfieldservices.com)>  
**Sent:** Wednesday, February 10, 2021 4:20 PM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; 'Amos, James A' <[jamos@blm.gov](mailto:jamos@blm.gov)>; [blm\\_nm\\_cfo\\_spill@blm.gov](mailto:blm_nm_cfo_spill@blm.gov)  
**Cc:** 'Todd Roberson' <[todd@trinityoilfieldservices.com](mailto:todd@trinityoilfieldservices.com)>; 'Clay Tipton' <[clay@trinityoilfieldservices.com](mailto:clay@trinityoilfieldservices.com)>; 'Josh Halcomb' <[josh@trinityoilfieldservices.com](mailto:josh@trinityoilfieldservices.com)>; [dan@trinityoilfieldservices.com](mailto:dan@trinityoilfieldservices.com); 'Robbie Runnels' <[rrunnels@mewbourne.com](mailto:rrunnels@mewbourne.com)>  
**Subject:** [EXT] NAPP2102039553, Coordinates 32.209471 N, -104 222315 - Release at Mewbourne Oil Company Archduke 19 W2AP Federal 001H  
**Importance:** High

All:

Trinity Oilfield Services and Rentals LLC (Trinity) on behalf of Mewbourne Operating (Mewbourne), is addressing a release of PRODUCED WATER

from the Subject Production location at the provided coordinates. Mewbourne submitted the initial C-141 for the release. Incident number NAPP2102039553 was assigned by NMOCD.

Trinity and Mewbourne have worked to characterize the site and the field data is complete. The field data was generated through a sampling frequency per NMOCD guidance followed by field titration.

A summary of the field data is provided along with this email and a sample location map is provided for your review (attached).

Samples collected from the site have just been sent to the laboratory.

Due to the forecasted precipitation (snow) on Sunday, February 14, 2021, Trinity plans to begin excavating the site tomorrow (February 11, 2021) based on field data alone.

**The reasoning for this urgent request is that the release flowed some 2,100 feet down the county road ditch towards the Black River tributary to the Pecos River. Trinity and Mewbourne are attempting to mitigate the release before runoff from precipitation carries dissolved salts closer to the Black River. Traffic safety along this rather isolated county road is also a consideration in this request.**

The distal end of the release is still over 1400 feet from the river. In an effort to protect the Black River, Trinity proposes to 1.) excavate impacted soil from the road ditch using a track excavator; 2.) collect confirmation samples that the release has been cleaned to the strictest Table 1 Standards per NMAC 19.15.29.12.E.2 standards where depth to groundwater is less than 50 feet below ground surface and 3, backfill the road ditch with local non-impacted soil to the west of the county road. The soil placed in the road ditch will be compacted with the equipment at hand and reshaped to carry future runoff from the area. Confirmation sampling will be concurrent with excavation. Backfilling will be nearly contemporaneous with excavation. As stated above, the purpose for

near contemporaneous backfilling is to maintain safe passage along the roadway after hours.

Confirmation sampling will be sent to the lab and a final report and closure request will be provided in a timely manner.

**THIS IS an IMMEDIATE ACTION necessary to be protective of surface and ground water in the Black River basin and for reasons of public health (traffic safety).**

We are seeking your concurrence to implement this plan immediately.

Sincerely,

John P. Farrell P.G.