

**Venegas, Victoria, EMNRD**

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**From:** Venegas, Victoria, EMNRD  
**Sent:** Monday, May 3, 2021 1:44 PM  
**To:** Heather Huntington; Tim Friesenhahn  
**Cc:** Hernandez, Emily, EMNRD  
**Subject:** 3RF-43 - KWU 2309-19K RECYCLING FACILITY. Extension Approved. Performance of incremental fluid level test.

**Extension Approved. Performance of incremental fluid level test****3RF-43 - KWU 2309-19K RECYCLING FACILITY.**

Ms. Huntington,

NMOCD has approved an extension until May 17<sup>th</sup> to repair the primary liner at 3RF-43 - KWU 2309-19K RECYCLING FACILITY with the following conditions of approval:

Before the recommencement and resumption of recycling operations at 3RF-43 - KWU 2309-19K RECYCLING FACILITY, [372286] ENDURING RESOURCES, LLC is required to perform an incremental fluid level test for containment liquid levels above the minimum liquid level. The steps for the incremental fluid level test are listed below.

[372286] ENDURING RESOURCES, LLC will fill the containment. [372286] ENDURING RESOURCES, LLC will pause filling operations every 10% of total fluid capacity above the minimum level.

1. [372286] ENDURING RESOURCES, LLC will maintain the liquid level for each 10% volume increase for 24 hours and will inspect and operate the leak detection system at the end of the 24-hour period.
  - A. If there are no liquids present in the leak detection system, [372286] ENDURING RESOURCES, LLC may proceed to fill the next 10% volume and repeat the process until the containment full design capacity minus the 3-feet of freeboard is reached.
  - B. If liquids are present, [372286] ENDURING RESOURCES, LLC should immediately cease the incremental fill test and perform a liner inspection. [372286] ENDURING RESOURCES, LLC should provide written notice of the fluid detection and liner inspection findings through OCD.Online using a C-147 (long form) with the "Other" box checked and "Notice of fluid detection" written as the explanation of "Other."
    - i. Upon notification of fluid detection in the leak detection system, the OCD will verify the source of water (condensation versus produced water).
    - ii. If the detected fluid is confirmed to be condensation, the OCD will issue a written approval to proceed with the incremental fluid level test.
    - iii. If the detected fluid is confirmed to be produced water, [372286] ENDURING RESOURCES, LLC must comply with 19.15.34.13 NMAC. [372286] ENDURING RESOURCES, LLC must provide written notification to the OCD.Enviro mailbox on the actions taken to comply with 19.15.34.13 NMAC.
    - iv. After fluid is detected in the leak detection system, the incremental fill test cannot continue until after a written approval to proceed is issued by the OCD.
2. [372286] ENDURING RESOURCES, LLC must submit a report detailing the incremental fluid level test process and results through OCD.Online, using a C-147 (long form) with the "Other" box checked. "Recommencement of Operations - Incremental Fluid Level Test" should be written as the explanation of "Other." [372286] ENDURING RESOURCES, LLC should verify that the resumption of operations notification does not result in any changes to the recycling containment operating and maintenance plan or the closure plan. If the recommencement of operations will affect the operating and maintenance plan or closure plan, operators should check those boxes in section 9 and provide updated plans or plan addendums as attachments to the C-147.

Please let me know if you have any questions or concerns.

Regards,

**Victoria Venegas** • Environmental Specialist  
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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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CONDITIONS

Action 26669

**CONDITIONS OF APPROVAL**

Operator:	ENDURING RESOURCES, LLC	1050 17TH STREET, SUITE 2500	DENVER, CO80265	OGRID:	372286	Action Number:	26669	Action Type:	C-147L
OCD Reviewer	Condition								
vvenegas	None								