

Leking, Geoffrey R, EMNRD

From: Randall Hicks <r@rthicksconsult.com>
Sent: Friday, April 25, 2014 1:56 PM
To: Leking, Geoffrey R, EMNRD
Cc: Scott Pitts; Tim Bussell; kristin@rthicksconsult.com
Subject: RE: Yates - Caravan 8H/7H
Attachments: ClosurePlan-No Liner Re-use.pdf

HOBBS OCD

APR 25 2014

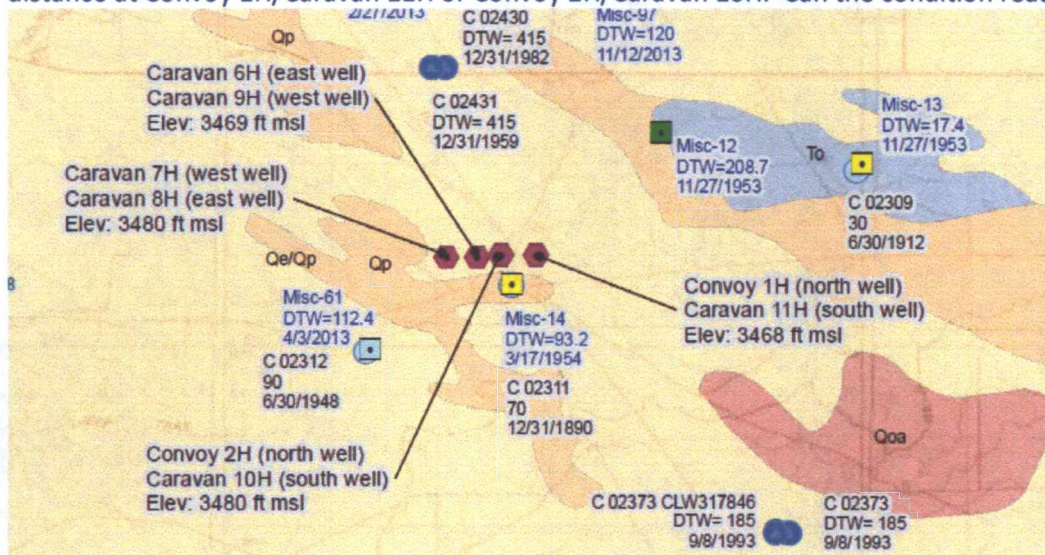
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Thanks Geoff

Attached is the revised closure plan. Kristin will be talking to you about a meeting in Hobbs with Murchison, Yates, NMOCD Santa Fe, and OCD Artesia to work out some of the outstanding issues associated with pit closure. I think it is time to lock ourselves in a room and hash out some of the competing technical concerns. But leave that for later – the plan revision is attached.

Here is an alternate proposal for the condition – think about it for a few days.

For the 7H/8H twins, we feel “certain” that we are much greater than 50 feet to groundwater and pretty confident that there is more than 100 feet between the pit bottom and groundwater. But we are not so confident about the 100-foot distance at Convoy 1H/Caravan 11H or Convoy 2H/Caravan 10H. Can the condition read



“Yates must adhere to the Table II closure restrictions for a 50-foot distance to groundwater unless they demonstrate, through the logging of cuttings by a geologist at Convoy 1H or Caravan 9H, that the distance to groundwater is greater than 100 feet at this site.”

Normally Yates does not drill to 120 feet. They are more than willing to spend the extra money do so. However,

it makes more economic sense to spend the extra money at the location that will provide the “worst case” scenario – which is Convoy 1H or Caravan 9H (see below).

That way we spend the money once and get the data we need for all four pits.

Let us know if this works. Pit lining should happen Tuesday or Wednesday I think.

Again, thanks and have a good weekend.

Siting Criteria (19.15.17.10 NMA
Yates Petroleum Corp – Caravan State Unit 9H and C

- The distance between the bottom of a 10-foot deep temporary pit and the potentiometric surface of the regional aquifer is approximately 136 feet ($3,469 - 10 - 3,350 =$) 109 feet.

Because the estimate of depth to groundwater is relatively close to 100 feet, Yates may elect to drill a mousehole/rathole to a depth of 120 feet, log the cuttings and provide a better estimate for this area near Bell Lake.

Siting Criteria (19.15.17.10 NMAC)
Yates Petroleum Corp – Convoy BUC State 1H and Caravan State Unit 11H

- The distance between the bottom of a 10-foot deep temporary pit and the potentiometric surface of the regional aquifer is approximately 136 feet ($3,468 - 10 - 3,350 =$) 108 feet.

Because the estimate of depth to groundwater is relatively close to 100 feet, Yates may elect to drill a mousehole/rathole to a depth of 120 feet at a nearby well, log the cuttings and provide a better estimate for this area near Bell Lake.

Randall Hicks
RT Hicks Consultants
Office: 505-266-5004
Cell: 505-238-9515

From: Leking, Geoffrey R, EMNRD [<mailto:GeoffreyR.Leking@state.nm.us>]
Sent: Friday, April 25, 2014 1:22 PM
To: Randall Hicks
Subject: RE: Yates - Caravan 8H/7H

Randy

The C-144 Permit Package for the Yates Caravan State Unit 7H and 8H Temporary Pit, Section 33 T24S R33E Lea County NM, February 2014 is approved with the following conditions:

- 1) Log the rathole boring to discern/verify the depth to water.
- 2) Rewrite Pages 2 and 3 of the "Temporary Pit In Place Closure Plan, Protocols and Procedures for Earthwork" to delete any references to the reuse of liner panels and also additional language as will be directed by the NMOCD.

Please contact me if you have any questions. Thank you.

Geoffrey Leking
Environmental Specialist

NMOCD-Hobbs
1625 N. French Drive
Hobbs, NM 88240
Office: (575) 393-6161 Ext. 113
Cell: (575) 399-2990
email: geoffreyr.leking@state.nm.us

From: Randall Hicks [<mailto:r@rthicksconsult.com>]
Sent: Monday, April 21, 2014 9:25 PM
To: Leking, Geoffrey R, EMNRD
Subject: Yates - Caravan 8H/7H

Geoff

Next up for Yates is Caravan 8H/7H – transmitted to OCD on 2/26/14. The 60-day clock creates an automatic denial a few days after 4/27. What do we need to do on our end to move this one through the process this week? The Convoy 1H was also transmitted on 2/26/14.

Caravan 10h/Convoy 2H and Caravan 9H/6H were transmitted on 3/6/14 – so we have some time for approval of these two pits –from a logistical and regulatory standpoint.

Here is the latest word on the Yates drilling schedule:

By Friday 5-2-14 they will go to the Caravan 8H, then to the Caravan 7H, these two are on the same pad.

Nomac 22 will then go to the Convoy 2H, then to the Caravan 10 H, these two are on the same pad

Randall T. Hicks
505-266-5004 (office)
505-238-9515 (cell and best number to use)