

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



May 9, 2017

HOBBS OCD

MAY 22 2017

RECEIVED

Stephanie Garza
R360 Artesia, LLC
507 North Marienfeld, Suite 200
Midland, Texas 79701

**RE: Request for Minor Modification of Surface Waste Management Permit NM1-030
R360 Artesia, LLC
R360 Artesia, LLC Landfarm: Permit NM1-030
Facility Location: N/2 of Section 7, Township 17 South, Range 32 East NMPM
Lea County, New Mexico**

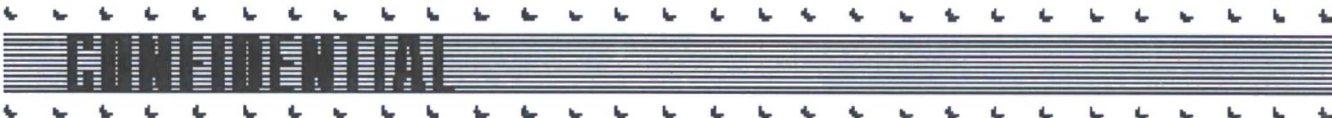
30.025-46751

Dear Ms. Garza:

The Oil Conservation Division (OCD) has completed reviewed R360 Artesia, LLC's (R360) permit minor modification request, dated May 3, 2017 and the supplemental Form C-137A dated May 9, 2017, to reduce the quarterly vadose zone monitoring frequency, required by Permit NM1-030, for total petroleum hydrocarbons (TPH) and volatile aromatic organics (BTEX) to semi-annual, as required of 19.15.36.E(2) NMAC. R360 also requests to utilize EPA Method 8015 modified (C₆ - C₃₆) in lieu of EPA Method 418.1 to conduct all future vadose zone and treatment zone monitoring.

OCD hereby grants R360 approval of the minor modification requests, with the following conditions:

1. R360 Artesia, LLC shall comply with all applicable requirements of the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), the existing permit NM1-30, the transitional provisions of 19.15.36.20 NMAC, and all conditions specified in this approval;
2. R360 shall monitor the vadose zone (native soils) for total petroleum hydrocarbons (TPH), volatile aromatic organics (BTEX), and Chloride semi-annually; and major cations/anions and Water Quality Control Commission (WQCC) metals annually;
3. R360 shall continue to monitor the treatment zone (soils being remediated) semi-annually for TPH and Chloride to demonstrate compliance with the transitional provision of 19.15.36.20.A NMAC; and
4. Laboratory analysis shall be determined by using EPA Method 8015 modified for TPH (C₆ - C₃₆), EPA Method 8021B for BTEX, and EPA Method 6010B for WQCC metals (Subsections A, B, and C of 20.6.2.3103 NMAC – Arsenic, Barium, Cadmium,



To:

From:

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Date: 05/17/2017

**Pages including
cover sheet:** 2

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Note:

Please find herewith the correspondence from Michael Newell on behalf of the City of Jal for OWL SWD Operating, LLC's Application for Authorization to Inject on Bobcat SWD #1, Section 25, Township 25 South, Range 36 East, Lea County, New Mexico.

If you should have any questions, please do not hesitate to contact our office.

NEWELL LAW FIRM

MICHAEL T. NEWELL

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May 17, 2017

New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, NM 87507

**Re: OWL SWD Operating, LLC's Application for Authorization to Inject/Bobcat
SWD #1, Section 25, Township 25 South, Range 36 East, Lea County, New
Mexico, N.M.P.M.**

Dear Sir/Madam,

Please accept this letter as City of Jal's request for hearing and opportunity to be heard regarding the above referenced matter. City of Jal has concerns which center on the protection of the underlying groundwater. City of Jal reserves the right to amend, modify or withdraw its participation based upon further review of said application, and any other pertinent information.

Sincerely,

NEWELL LAW FIRM

By:


Michael Newell

MTN:sj

p.c. City of Jal
Lonquisit & Co., LLC