

Ancell Environmental Consulting Services, LLC

July 3, 2025

New Mexico Oil Conservation Division (NMOCD) Attn: Leigh Barr, Administrative Permitting 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Annual Leak Detection Report – Evaporation Ponds
Reporting Period July 2020 - June 2021
T-N-T Environmental, Inc. (OGRID 22099)
Permit NM 1-008 (Evaporation Ponds and Landfarm)
SE/4 of Section 7 and SW/4 of Section 8 (3 evaporation ponds) and the SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of Section 8 (landfarm), Township 25 North, Range 3 West, NMPM, Rio Arriba County, New Mexico

Dear Ms. Barr,

On behalf of T-N-T Environmental, Inc. (TNT), Ancell Environmental Consulting Services, LLC (AECS) would like to present the monitoring records detailing the weekly and monthly inspections of the leak detection systems in place for each pond to demonstrate compliance with the NM1-8 Conditions listed below. In correspondence dated July 15, 2022, NMOCD representative Brad Jones indicated that the NMOCD has not received any leak detection monitoring reports for the evaporation ponds since 2016. Based upon the existing permit conditions of Permit NM1-008 and the transitional provision of 19.15.36.20.A NMAC, TNT is required to inspect the leak detection sumps at Pond One (1) and Pond Three (3) on a weekly basis and the monitoring wells surrounding Pond Two (2) monthly. If fluid is present in the leak detection system, the fluids in the pond and the leak detection system must be analyzed for total dissolved solids (TDS) to determine if there are any leaks. The purpose of this Annual Leak Detection Report is to fulfill the requirements outlined in Conditions 2 and 4 of the Reporting and Record Keeping Section listed in permit NM1-008.

> 180 E. 12th St. Durango CO. 81301 tancellenviroco@gmail.com



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Leak Detection Sump and Monitor Well Results

Pond 1

The leak detection sump water level was recorded as 1 to 2 inches. The weekly inspection records for October 2020 to June 2021 are attached. The inspection records for July through October 2020 could not be located at this time.

Pond 2

There are no monthly monitor well data records for this reporting period.

Pond 3

The leak detection sump water level was measured as zero (0) inches. The weekly inspection records are attached. The weekly inspection records for October 2020 to June 2021 are attached. The inspection records for July through October 2020 could not be located at this time.

Discussion

Pond 1 reported water levels ranging from 1-inch to 2-inches over the duration of the monitoring period. A small accumulation of liquid in the bottom of the pipe is typical of the detection system due to condensation between the two liners of the active pond. As such, no water is detected in the Leak Detection Sump that would indicate a leak in Pond 1. The leak detection monitoring assessment for Pond 2 cannot be evaluated for this monitoring period. There was no water was detected in the Leak Detection Sump of Pond 3 and no indication of a leak in the system.

Sincerely,

Emilee Skyles

Emilee Skyles Project Manager

> NM1-8 Evaporation Pond Monitoring Annual Report 2020-2021 Page 2



Ancell Environmental Consulting Services, LLC

FIGURES

Figure 1. Location Map

Figure 2. Topographic Map

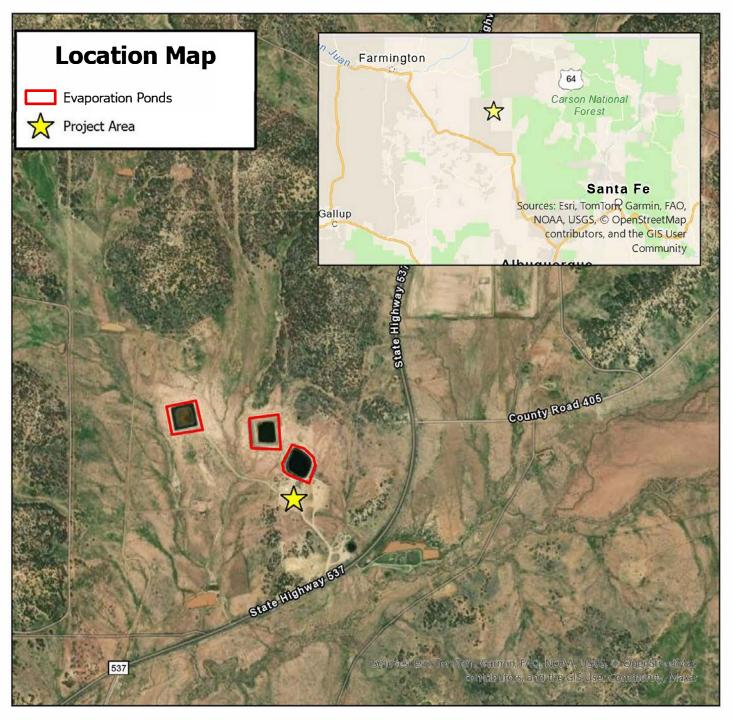
ATTACHMENTS

Weekly Report on Leak Detection Sumps, Pond One and Pond Three

Limitations

Ancell Environmental Consulting Services has prepared this report to the best of its ability. No other warranty, expressed or implied, is made or intended. AECS has reviewed and relied upon documents referenced in this report and on oral statements made by individuals. AECS has not conducted an independent examination of the facts contained in the referenced materials and statements. AECS has presumed the genuineness of these documents and statements and that the information provided therein is true and accurate.

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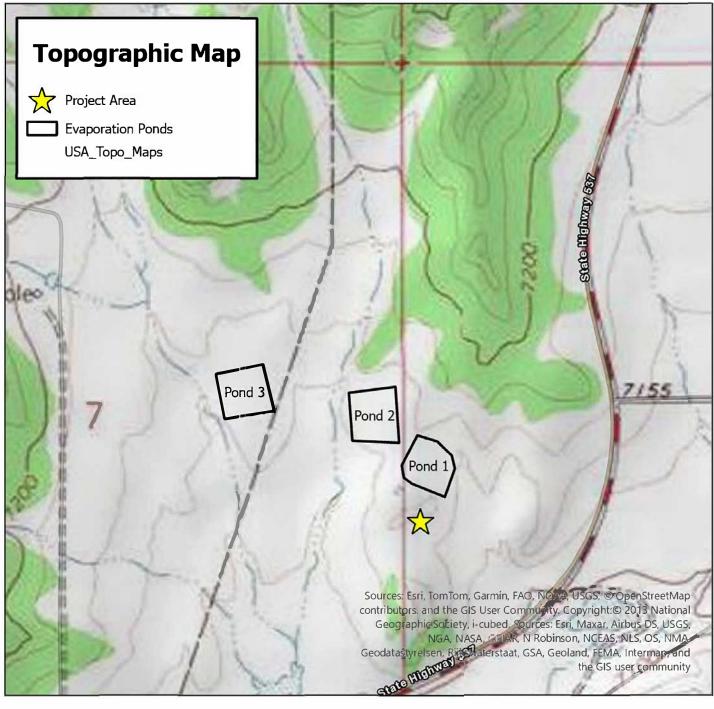
TNT Environmental, Inc

Permit NM1-008
Evaporation Ponds and Landfarm
Facility ID: fEEM0112335451

SE/4 of Section 7 and SW/4 of Section 8 (Evaporation Ponds) and SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of Section 8 (Landfarm)
Township 25 North, Range 3 West, Rio Arriba County, New Mexico

Fig 1

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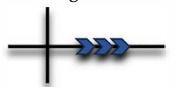


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Ancell Environmental

Consulting Services



TNT Environmental, Inc

Permit NM1-008
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SE/4 of Section 7 and SW/4 of Section 8 (Evaporation Ponds) and SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of Section 8 (Landfarm)
Township 25 North, Range 3 West, Rio Arriba County, New Mexico

FIG 2

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T-n-T weekly Reports On Leak Detection Sumps Year 2020 - 2021

	Pit#1	Pit#3
Oate	Water Level	Water Lovel
10-27-20	1"	04
10.28.20		04
1020.20	(4	04
10-30-20	1"	0"
11-2-20		04
11.3.20		04
11-4-20	۱"	0"
11-5-20	114	5 a
11-6-20	1 ""	616
11-9-20	ر ((oli
11-10.29	114	0"
11-01.20	. "	04
11-17-70	16	nle
11-13-20	100	0"
11-16.20		011
11-17-20		04
11-18-20		D''
11-14-20	4"	04
11-20-20	("	0"
11-23-20	2"	041
14.24.20	14	0"
11-25.20	14	0"
4-27-20	14.	0"
11-30-20	2	OU
12-1-20		D"
12-2-20	(u	0"
12-3-20	111	0"
12-4-20	-	0"

	Pit#1	Pit # 3
Date	Water Level	Water Level
12-7-20	2"	0"
12-8-20	iu	10
12-9-20	14	06
12-10-20	144	666
12-11-20	14	6"
4-14-20	χ "	04
12-15.20	110	0"
12-16-20	Luc	0"
12-19-20	<i>l</i> .	O'
12-18-20		04
12-21-20	211	04
2-22-20	116	04
12-27-20	1 "	0''
1574-70	(61	0"
12.28.20	2"	0 4
12.29.20	14	04
12.30.20	14	0"
12-31-20	1 4	0"
1-4-20	ر ا	0"
1-5-21	1"	0 "
1-6-21	14	04
1-7.21	(''	0"
1-8-21	l"	
1-11-21	111	0 9
1-12-21	("	04
1.17-21	(4	
1.10.21	4	0"
1-15-21	l u	04

T-n-T weekly Reports On Leak Detection Sumps Year 2021

	Pit#1	Pit # 3
Date	Water Level	Water Lovel
1-18-21	200	04
1-19-21	11/	120
1-20-26	1"	0"
1-21-21	LH	011
1-22-21	l "	0"
1-25-21	2 u	04
1.28.21		04
1-27-21	14	0"
1-28-21	1 "	09
1-24-21	111	0"
2-1-21	2"	000
2-2-21	111	0 "
2-3-21	l u	04
2-4-21	1"	04
2-5-21	i"	0'
2.8-21	2"	04
2-9-21	11-	0"
2.10.21	1"	0''
2.11-21	114	04
2-17-21	الد	0 &
2-15-71	214	0"
2-16-21	166	6"
7-17-51	Lea	0"
2-11-21		0"
2119.21	14	0"
2-22-21	2"	0"
	1 "	0"
2-23-21	1"	0"

	Pit # 1	Pit # 3
Date	Water Level	Water Level
2.25-11	14	04
2.26.21	1 ^{lc}	0"
3-1-21	214	04
3-2-21	100	Ou
33-21	14	0"
3-4-21	110	0"
3-5-21	(u	04
3-8-21	200	07
3-9-21	1"	0"
3-10-21	14	04
13-11-21	14	64
3-12-21	الد	011
3-15-21	211	0"
3-16-21	(''	04
3-17-21	1 UF	0-11
3-18-21	12	0"
3-19-21	1'	0 4
3-22-21	l"	0"
3-23-21	1 12	04
3-24-21	("	0 €
3-25-21	116	011
13-76-21	14	04
3-29-U 3-30-U	۱٬٬	04
3-30-21	("	04
13-31-211	1.(4	04
4-1-21	14	011
4-1-21	1.11	04
4-5-21	2"	0"

T-n-T weekly Reports On Leak Detection Sumps Year 2021

	Pit#1	Pit#3
Date	Water Level	Water Level
1)-6-21	1"	0.,
4-7-21	111	0,,
4.8-71	14	0 4
4-9-21	D	0 "
4-12-21	2"	04
4-17-21	1	0"
4-14-21		0"
4-15.71	14	0"
1-16-21	1"	o a
4-191-21	211	Ou
4-20-21	1100	00
4-29-21	100	0"
4-22-21	Lee	0"
1-23-21	1 ^u	0"
1-26-21	2"	04
7-27-21	1"	01
4.78.71	1"	6 u
4-29-21	64	04
4-30-21	14	0 "
5-4-21	1 "	o ''
5-5-21	("	0 "
5-6-21	1"	0"
5-7-21	١٧	04
5-10-21	2"	0 "
5-10-21 5-11-21 5-12-21	1"	0" 1
5-12-21	110	0"
5-13-21	1"	0"
5-14-21	1"	0,,

	Pit # 1	Pit # 3
Date	Water Level	Water Level
5-17-21	2"	6 *
5-18-21	lic	0"
5-14-21	111	0"
5-20-21	((0"
5-21-21	(''	0"
5-25-21	211	04
15-25-21	111	0''
5-26-21	1 "	01.
5-27-21	110	09
5-28-21	111	04
6-1-21	24	061
6-2-21	16	04
6-3-21	10	0.,
6-4-21	1'	0'
6-7-21	2	041
6-8-71	i. 16	09
6-9.21	12	0"
6-10-4	111	0"
6-11-21	,	0'1
6-14-21	211	0 u
(0-15-21	(''	04
6-16-71	17	011
6-17-21	((0 "
6-18-21	((
6-21-21	2"	04
6-12-21	1"	011
623-21	(04
6-17-2(6-18-2(6-2(-2) 6-22-2(6-23-2(624-21	14	0 5

T-n-T weekly Reports On Leak Detection Sumps Year 201

		i eai
	Pit # 1	Pit # 3
Date	Water Level	Water Lovel
6.25-21	14	64
6-28-21	2.	04
6-24.21	160	04
	(4	08
8-1-21	110	04
7-2-21	14	04
7.621	24	04
7-6-21	14	09
7-8-21	1"	0"
7-9-21	18	04
7-12-21	24	04
7-13-21	100	0"
7-14-21	1'-	0"
7-15-21	14	04
7-16-21	1"	04
7-19-21	211	04
7-20-21	14	0 "
7-21-21	14	0"
7-22-21	, "	0"
7-23-21	1.,	0,,
7-26-21	111	O,,
7-27-21	1"	64
k P	1 14	04
7-24-21	1 "	0"
7-30-21	16	6"
8-2-71	2"	04
8-3-21	14.	011
8-4-21	111	04

Pit # 1	Pit # 3
Water Level	Winter Level
100	0"
1"	04
2"	04
1 "	04
110	0''
100	0"
14	0"
210	0"
14	04
111	001
(10	D 10
110	0 "1
2 "	0 "
110	011
1"	04
	Dli
("	0 4
24	04
100	0"
110	0 01
	04
	0"
14	04
11/1	514
14	54
111	04
111	•
110	011

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

CONDITIONS

Action 474043

CONDITIONS

Operator:	OGRID:
T-N-T ENVIRONMENTAL INC	22099
PO Box 2530	Action Number:
Farmington, NM 87499	474043
	Action Type:
	[C-137] Non-Fee SWMF Submittal (SWMF NON-FEE SUBMITTAL)

CONDITIONS

Create By		Condition Date
lbarr	Accepted for record.	11/7/2025