



**SQ Environmental, LLC** P.O. Box 1991 Austin, TX 78767-1991 (512) 900-7731 www.SQEnv.com

8 November 2024

Shelly Wells New Mexico Oil Conservation Division New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Via E-Mail: <a href="mailto:shelly.wells@emnrd.nm.gov">shelly.wells@emnrd.nm.gov</a>

RE: Response to NMOCD Comments Email, Dated 29 October 2024 Myrtle Myra SWD #001 Well (API No. 30-015-21515) Site Assessment Plan 2.24 Acres of Section 21, Township 21S, Range 27E, Subdivision NENW (and Assoc. ROW) Eddy County, New Mexico SQE PN: 1180.082.001

Dear Ms. Wells:

SQ Environmental, LLC (SQE) prepared this letter in response to the New Mexico Oil Conservation Division (NMOCD) e-mail dated 29 October 2024 regarding the Site Assessment Plan (SAP) for the Myrtle Myra Salt Water Disposal (SWD) #001 Well (API No. 30-015-21515) located at latitude 32.4709549, longitude - 104.1971588 and associated Right-of-Way (ROW) in Eddy County, New Mexico (Myrtle Myra Facility). The Myrtle Myra Facility is located on land owned by the Bureau of Land Management (BLM). This letter has been prepared on behalf of Select Agua Libre Midstream, LLC (grantee of BLM ROW Grant #NMNM-144986).

The SAP for the Myrtle Myra Facility was submitted to NMOCD online portal system on 22 October 2024. In an e-mail dated 29 October 2024, NMOCD stated that the SAP was approved with the conditions described below. The NMOCD e-mail dated 29 October 2024 is provided in **Attachment A**.

#### **RESPONSE TO NMOCD COMMENTS, DATED 29 OCTOBER 2024**

The NMOCD comments are provided in italics in this section followed by the responses.

**Comment 1**: If nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, data must be no more than 25 years old, and well construction information must be provided. OSE-POD C-04251 is.5 miles away and has a depth to groundwater of exactly 100 feet, therefore Table 1 51 feet-100 feet RRALs apply. Pursuant to 19.15.29.11(A)5(c) NMAC, "if the release occurred outside of a lined containment area and is in an area where depth to ground water is greater than 50 feet and less than or equal to 100 feet, the responsible party must delineate the vertical extent of the release to the greater of 600 mg/kg chloride or background level, if the release is of an unknown quantity or results in greater than 200 barrels of unrecovered produced water."

<u>Response to Comment 1</u>: As described in the SAP, two nearby wells were identified and used to determine depth to groundwater at the Myrtle Myra Facility. Both of these identified wells are approximately 0.5 miles from the Myrtle Myra Facility and depth to groundwater data is no more than 25 years old.



- <u>C-04251-POD1</u>. This well is 0.5 miles southwest of the Myrtle Myra Facility and reportedly had a depth to water (DTW) of 100 feet (ft) below ground surface (bgs) in 2018 (6 years ago).
- <u>C-04414-POD1</u>. This well is 0.5 miles west-northwest of the Myrtle Myra Facility and reportedly had a DTW of 120 ft bgs in 2020 (4 years ago).

Well construction information for both of the above wells was obtained online from the New Mexico Office of the State Engineer (NMOSE) database, which are included within **Attachment B** of this letter. As described in NMAC 19.15.29.11(A)2: "The responsible party must determine the depth to ground water where the release occurred. If the exact depth to ground water is unknown, the responsible party must provide a reasonable determination of probable ground water depth using data generated by numeric models, cathodic well lithology, water well data, published information or other tools as approved by the appropriate division district office. If the responsible party uses water well data, the responsible party must provide all pertinent well information."

Since the exact depth to water is not available, a reasonable determination of probable groundwater depth is provided below by the following lines of evidence:

DTW appears to be increasing (deepening) when moving northeast from the City of Carlsbad (where the Pecos River and East Canal are located) towards the Myrtle Myra Facility. See below image (basemap from New Mexico Office of State Engineer website). Wells between the Pecos River and East Canal generally have reported DTWs between 20 and 30 ft bgs. Wells just northeast of the East Canal in the direction of the Myrtle Myra appear to generally have reported DTWs between 30 and 40 ft bgs. For further evidence of this, well C-04544-POD1 and C-04684 were selected as case studies. Well C-04544-POD1 was drilled in 2021 (3 years ago) and reported with a DTW of 40 ft bgs. Well C-04684-POD1 was drilled in 2023 (1 year ago) and reported with a DTW of 32 ft bgs.

A figure showing the general locations of wells described in this bullet, along with a simplified groundwater elevation map is provided below. Groundwater elevations appear to decrease (shallow) when moving southwest from the Myrtle Myra Facility towards the City of Carlsbad East Canal.



Additionally, the above observations are consistent with the topographic profile of the region. As shown in the below figure (basemap from the USGS website), land elevations (relative to sea level) appear to decrease when moving southwest from the Myrtle Myra Facility towards the City of Carlsbad East Canal.



Based on these data provided, the depth to groundwater at the Myrtle Myra is believed to be greater than 100 ft. A conservative estimate for current DTW at the Myrtle Myra Facility would likely be 120 to 130 ft bgs, based on the trends and information described above. Based on this evaluation, we respectfully request to use the NMOCD Limits that are respective for this groundwater depth (greater than 100 ft), as



described in Table 1 of NMAC 19.15.29.12. As such, the conditions of NMAC 19.15.29.11.A(5)(c) does not apply to the Myrtle Myra facility; therefore, delineation to 600 mg/kg is not necessary.

**<u>Comment 2</u>**: Samples should be grab samples collected at surface, 1', 2', 3' and 4'. Due to this being a historical release, all samples obtained must be submitted to a laboratory for analysis. In addition, samples must be tested for all Table 1 constituents.

<u>Response to Comment 2</u>: As requested by NMOCD, SQE proposes to collect samples at the surface, 1 ft, 2 ft, 3 ft, and 4 ft depths at each sample location. SQE also proposes to immediately analyze the samples collected at the surface and 1 ft depth at each location for all Table 1 constituents. SQE further proposes that samples collected at the 2 ft, 3 ft, and 4 ft depths be placed on 'hold' at the laboratory. If necessary, the 2 ft sample will be analyzed for the parameter(s) that exceed closure criteria for the respective 1 ft sample. Additionally, the 3 ft and/or 4 ft samples will be analyzed for the parameter(s) that exceed closure criteria for concentrations to attenuate with depth, and analysis of deeper samples may not be necessary if the upper two samples confirm parameters at concentrations less than NMOCD limits. This approach will ultimately reach the same end goal but will allow for significant cost and laboratory resource savings.

<u>Comment 3</u>: It is noted that the Area of Impact shown on pg. 4, Figure B is larger than the area of impact that is drawn on Figure 3. Referring to Figure B, the ruler box located to the left of the yellow polygon is covering more impacts. It appears the berm was breached as there are scraping striations seen off pad on the west side that are similar to the scrapes on pad. This area will also require delineation. OCD will email a kmz file or a screenshot providing suggested sampling locations as the 3 provided in this Site Assessment Plan are not enough to delineate such a large release area.

<u>Response to Comment 3</u>: NMOCD followed up to the above comment with a screenshot providing suggested sampling locations. This screenshot is shown below:



Ms. Shelly Wells Myrtle Myra Facility – Responses to NMOCD Comments (SAP) 8 November 2024 Page 5



In total, NMOCD has requested 16 sampling locations, with 14 located on the well pad (as shown above). If areas above NMOCD limits are identified, soils will be remediated in accordance with NMAC 19.15.29.12, and restored, reclaimed, and re-vegetated in accordance with NMAC 19.15.29.13.

Based on the ~41,000 square foot (ft<sup>2</sup>) area of impacts, this is a requested sampling density of one sample per approximately 3,000 ft<sup>2</sup> (or one sample per 0.07 acres) on the well pad. SQE is amenable to collecting additional samples to identify constituents at levels above Table 1 closure criteria; however, we propose a sampling density of one sample per approximately 5,000 ft<sup>2</sup> (or one sample per 0.11 acres) on the well pad (eight samples). SQE agrees with the plan to collect two samples to the west side of the pad in the area where NMOCD suggested the berm may have been breached. In total, SQE proposes ten sampling locations for identifying constituents at levels above Table 1 closure criteria, as shown by the revised **Figure 3** attached to this letter.

The reasoning behind this approach is that the 10 proposed sample locations will be sufficient to identify whether constituents are present at the Area of Impact above Table 1 closure criteria. In the event exceedances of any of the Table 1 closure criteria are identified, the impacted soil will be remediated in accordance with NMAC 19.15.29.12, and restored, reclaimed, and re-vegetated in accordance with NMAC 19.15.29.13. The remediation of impacted soil will include a confirmation sampling methodology (typically one five-point composite sample per 200 square feet) that will confirm the lateral and vertical extent of impacted soil above Table 1 closure criteria has been successfully removed.

**<u>Comment 4</u>**: The proposed background sample locations are not acceptable. It looks like you may need to collect them greater than 100 feet off pad (which is completely acceptable in this situation), well away from any disturbed areas, and upgradient. They must be tested for all Table 1 constituents as well. Submit remediation plan to OCD by 1/27/2025.



#### Ms. Shelly Wells Myrtle Myra Facility – Responses to NMOCD Comments (SAP) 8 November 2024 Page 6

<u>Response to Comment 4</u>: SQE concurs with Comment 4. Revised background sample locations are proposed on the revised **Figure 3** attached to this letter. Background samples will be tested for total petroleum hydrocarbons (TPH), BTEX constituents (benzene, toluene, ethylbenzene, and xylenes), and chloride using the analytical methods presented in Table 1.

### CLOSING

Please let us know if you have any questions or comments regarding this information. Eric may be reached by e-mail at <u>E.Friedman@SQEnv.com</u> or by phone at 561-906-8028, and Randy may be reached by e-mail at <u>R.Gonzalez@SQEnv.com</u> or by phone at 512-541-6028.

Sincerely,

SQ Environmental, LLC

Eric Friedman, P.G. Project Manager

Randy Gonzalez

Senior Project Manager

cc: Dan Dear, Select (DDear@selectwater.com)

**Attachments** 

Figure 3 – Proposed Sample Map (Revised) Attachment A – NMOCD Approval E-Mail Dated 29 October 2024 Attachment B – Supporting Information



Received by OCD:

11/18/2024 2:42:04 PM

## ATTACHMENT A NMOCD APPROVAL E-MAIL



### **Randy Gonzalez**

From:	OCDOnline@state.nm.us
Sent:	Tuesday, October 29, 2024 11:30 AM
То:	r.gonzalez@sqenv.com
Subject:	The Oil Conservation Division (OCD) has approved the application, Application ID: 394489

To whom it may concern (c/o Randy Gonzalez for SELECT AGUA LIBRE MIDSTREAM, LLC),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nMLB1122141620, with the following conditions:

- Site Assessment Approved with the Following Conditions: 1) If nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, data must be no more than 25 years old, and well construction information must be provided. OSE-POD C-04251 is.5 miles away and has a depth to groundwater of exactly 100 feet, therefore Table 1 51 feet-100 feet RRALs apply. Pursuant to 19.15.29.11(A)5(c) NMAC, "if the release occurred outside of a lined containment area and is in an area where depth to ground water is greater than 50 feet and less than or equal to 100 feet, the responsible party must delineate the vertical extent of the release to the greater of 600 mg/kg chloride or background level, if the release is of an unknown quantity or results in greater than 200 barrels of unrecovered produced water."
- 1 continued) Samples should be grab samples collected at surface, 1', 2', 3' and 4'. Due to this being a historical release, all samples obtained must be submitted to a laboratory for analysis. In addition, samples must be tested for all Table 1 constituents.
- 2) It is noted that the Area of Impact shown on pg. 4, Figure B is larger than the area of impact that is drawn on Figure 3. Referring to Figure B, the ruler box located to the left of the yellow polygon is covering more impacts. It appears the berm was breached as there are scraping striations seen off pad on the west side that are similar to the scrapes on pad. This area will also require delineation. OCD will email a kmz file or a screenshot providing suggested sampling locations as the 3 provided in this Site Assessment Plan are not enough to delineate such a large release area.
- 3) The proposed background sample locations are not acceptable. It looks like you may need to collect them greater than 100 feet off pad (which is completely acceptable in this situation), well away from any disturbed areas, and upgradient. They must be tested for all Table 1 constituents as well. Submit remediation plan to OCD by 1/27/2025.

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you, Shelly Wells Environmental Specialist-A 505-469-7520 Shelly.Wells@emnrd.nm.gov

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**New Mexico Energy, Minerals and Natural Resources Department** 1220 South St. Francis Drive Santa Fe, NM 87505

## ATTACHMENT B SUPPORTING INFORMATION



Received by OCD: 11/18/2024 2:42:04 PM





WELL RECORD & LOG

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	BY SIGNIN	G BELOW,	I CERTIFY TH	T TO THE BEST OF MY KNOWLEDGE AND	BELIEF, THE FOR	EGOING IS A	TRUE A	ND CORRECT
URE	RECORD OF WELL RECO	THE ABO	VE DESCRIBED	WELL. I ALSO CERTIFY THAT THE WELL TAG, WITH THE PERMIT HOLDER WITHIN 30 DAYS A	, IF REQUIRED, HA	S BEEN INSTA	LLED AN	ID THAT THIS
IATI	$\sim$	Z						
SIG	6 K	/ ]		JACOB FRIESSEN		5-1	-20	
ġ		SIGNATU	JRE OF DRILLE	2 / PRINT SIGNEE NAME			DATE	
FOR	E NO.	AL USE	1414	POD NO. 1	TRN NO	L RECORD &	LOG (Ver	sion 04/30/2019)
LOC	CATION	<u> </u>				0 4-1-	147	PAGE 2 OF 2



## WELL RECORD & LOG

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N	OSE POD NO POD1 C-45	. (WELL NO 544	.)		WELL TAG ID NO. 20EBA			OSE FILE NO( C-4544	S).		
CATIO	WELL OWNE	ER NAME(S) E ANGEI	· · · · · · · · · · · · · · · · · · ·		I		*	PHONE (OPTI	ONAL)		
VELL LC	WELL OWNE 1608 W TA	R MAILING	ADDRESS					CITY CARLSBAI	)	state NM 882	ZIP 220
RAL AND V	WELL LOCATIO (FROM GP	N LA	DE	-104	MINUTES 27 12	SECONI 6 42	DS N W	* ACCURACY * DATUM REG	REQUIRED: ONE TEN QUIRED: WGS 84	TH OF A SECONE	)
ENE	DESCRIPTIO	N RELATIN	NGITUDE	STREET ADD	RESS AND COMMON	LANDMA	RKS - PLS	S (SECTION, TO	WNSHJIP, RANGE) WH	ERE AVAILABLE	
1. G	SECTION	29 TOW	NSHIP 21S RANG	GE 27E					, , , , , , , , , , , , , , , , , , , ,		
	LICENSE NO WD-1	753	NAME OF LICENSED	DRILLER JA	ACOB FRIESSEN	Ň			NAME OF WELL DR	ILLING COMPAN	Ŷ
:	DRILLING ST 6-23	TARTED -21	DRILLING ENDED 6-23-21	DEPTH OF CO	MPLETED WELL (FT) 97	,	BORE HO	LE DEPTH (FT) 97	DEPTH WATER FIRS	st encountere 40	ED (FT)
-	COMPLETE	) WELL IS:	ARTESIAN	DRY HO	LE 🗹 SHALLOV	W (UNCON	VFINED)	, <u>,</u> , ,	STATIC WATER LEV	VEL IN COMPLET 40	ED WELL (FT)
TION	DRILLING FI	LUID:	AIR	MUD	ADDITIVE	ES – SPEC	IFY:		L		
RMA	DRILLING M	ETHOD:	<b>P</b> ROTARY		R CABLE TO	DOL	[]] ОТНЕ	R - SPECIFY:			
NFO	DEPTH	(feet bgl)	BORE HOLE	CASING	MATERIAL AND	/OR		SINC	CASING	CASING W	
ASING INI	FROM	то	DIAM (inches)	(include	GRADE each casing string, a sections of screen)	and	CONNECTION TYPE (add coupling diameter)		INSIDE DIAM. (inches)	THICKNE (inches)	SS SIZE (inches)
& CA	-2	57	9.875	BLA	NK SCH40 PVC		(add coup GL	UE 5.5	5	.25	
<b>DNG</b>	57	97	9.875	SCR	EEN SCH40 PVC		GL	UE 5.5	5	.25	.035
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. DR		····			· · · · · · · · · · · ·						
				+							
		· · · · ·		1							
	DEPTH	(feet bgl)	BORE HOLE	LI	IST ANNULAR SE	AL MAT	TERIAL A	AND	AMOUNT	M	ETHOD OF
UAL	FROM	то	DIAM. (inches)	GRA	VEL PACK SIZE-	RANGE	BY INTE	RVAL	(cubic feet)	PL	ACEMENT
TER	0	20	9.875			CRETE			7.5		POURED
R MA	20	97	9.875		PEA G	KAVEL			28		POUKED
JLAF		·····		+		•					
INN				1	<u>dia 4. deno ante ante de la constata de la constata</u>				· · · · · · · · · · · · · · · · · · ·		
3. A											
								····			
FOR	OSE INTER	NAL USE	11 ~	····	·		- 1	WR-2	WELL RECORD	& LOG (Version	n 04/30/19)
FILE	NO.	<u> </u>	4 544		POD NO.	27			NO. 1968		
	ATION	m		(15.2	16.29:2	<u>-25</u>		WELL TAG I	DNO. 20E	BIT	PAGE I OF 2

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	DEPTH (1 FROM	feet bgl) TO	THICKNESS (feet)	COLOR AN INCLUDE WATF (attach sup	D TYPE OF MATERIA ER-BEARING CAVITIE oplemental sheets to ful	L EN S OF Iy de	NCOUNT R FRACT scribe all	ERED - URE ZONES units)		WAT BEAR (YES)	TER ING? ( NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	0	2	2	· · · · · · · · · · · · · · · · · · ·	TOPSOIL					 Y	✓ N	
	2	- 8	6		CALICHE & RO	СК				 Y	✓ N	
	- 8	44	36		SAND					/ Y	N	20.00
	44	57	13		ROCK		· · · · ·			 Y	✓ N	
	57	92	35		SANDSTONE & C	LAY	r			 / Y	N	5.00
	92	97	5		CLAY					Y	✓ N	
VELI						<b></b>		• • •		Y	N	
DF W										v	N	
96.0					*_************************************						N	
CL				·				··· , ,.		v	N	
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EOL										• •	N	
KOG					<u></u>						N	
YDF						<i>a</i> .		····		 v	N	
4. H				······			·				N	
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		·····			· · · · · · · · · · · · · · · · · · ·					 V	N	
	METHODI	SED TO ES		OF WATER DEADIN	C CTD ATA			T	TOTAL	ECTD		
				OF WATER-DEARING	U SIKAIA.				WELL	YIELD	(gpm):	25.00
					HER – SPECIFY:							
NOIS	WELL TES	r STAR	resource and the	ME, AND A TABLE SH	IOWING DISCHARGE	ANI	D DRAW	DOWN OVE	R THE 1	TESTIN	G PERIC	DD.
; RIG SUPERVI	MISCELLAI	NEOUS INF	ORMATION:									
5. TEST	PRINT NAM	IE(S) OF DI	RILL RIG SUPER	VISOR(S) THAT PRO	VIDED ONSITE SUPE	RVIS	SION OF V	WELL CONS	STRUCT	ION O	THER TH	IAN LICENSEE:
ATURE	BY SIGNIN RECORD OI WELL RECO	G BELOW, F THE ABO ORD WILL	I CERTIFY TH	AT TO THE BEST O WELL. I ALSO CERT WITH THE PERMIT H	F MY KNOWLEDGE IFY THAT THE WELL IOLDER WITHIN 30 D.	AND TAC AYS	) BELIEF 3, IF REQ AFTER 1	, THE FORI UIRED, HAS THE COMPLI	EGOING S BEEN ETION (	IS A INSTA DF WEI	TRUE A LLED AN LL DRILI	ND CORRECT ND THAT THIS JING.
6. SIGN		20	5	JAC	OB FRIESSEN					7-1	7-21	
	0	SIGNAT	URE OF DRILLE	R / PRINT SIGNEE	NAME			·			DATE	
FOF	OSE INTER	NAL USE					,	WR-20 WEL	LRECO	RD &	LOG (Ver	sion 04/30/2019)
FIL	E NO.	<u>/ -4</u>	544		POD NO.			TRN NO.	,96	83	53	
LO	CATION						WELL T	AG ID NO.				PAGE 2 OF 2



# WELL RECORD & LOG

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NO	OSE POD NO.	WELL NO.)	)	WELL TAG ID NO. 2119 F	~	OSE FILE NO(	s). 24684		
OCATI	Louis	S H	Stephens	Sr		PHONE (OPTIC	onal) 5-200-6	6763	
MELL I	WELL OWNE	ER MAILING	ADDRESS KOY AUC	-		CITY	bad N	M 887	ZIP COS
RAL AND	WELL LOCATIO	N LAT	ITUDE J	GREES MINUTES SECO Z Z 6 58.3	hnds 6 N	* ACCURACY	REQUIRED: ONE TENT	TH OF A SECOND	
ENEI	DESCRIPTIO	LON	GITUDE - K	STREET ADDRESS AND COMMON LANDA	ADVS DIS	S (SECTION TO	WNSHID DANGE WH	EDE AVATIADIE	
1. G	NE	NW S	SE Secto	$\sin 29$ T215 M	UTE		windhif, KANGE) whi	EREAVAILADLE	
	LICENSE NO.		NAME OF LIGENSED	DRILLER CC:5			NAME OF WELL DRI	LLING COMPANY	<i>C</i>
	DRILLING ST	$\sqrt{23}$	DRILLING ENDED	DEPTH OF COMPLETED WELL (FT)	BORE HOI	LE DEPTH (FT)	depth water firs SZ	ST ENCOUNTERED (FT)	)
NO	COMPLETED	WELL IS:	ARTESIAN *add Centralizer info bel	DRY HOLE SHALLOW (UNC	ONFINED)	STATIC IN COM (FT)	WATER LEVEL PLETED WELL <b>32</b>	DATE STATIC	MEASURED
IATIC	DRILLING FI	JUID:	AIR	MUD ADDITIVES - SPE	CIFY:		CHECK	HEDE IE DITI ESS ADA	DTED IS
ORN	DRILLING M	ETHOD:	ROTARY HAMM	TER CABLE TOOL OTHER – SPE	CIFY:		INSTAL	LED	
ASING INF	DEPTH (	(feet bgl) TO	BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CA CONN T	ASING NECTION YPE ling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
& CA	0	24'	87/8"	PUC	610	ued	6	15	
ING	24'	44'	87/8 "	PUL	Glu	red	6 "	+5	125
DRILI									
2.							USE DIT SEP	6 2023 PM1:31	
1	DEPTH (	(feet bgl)	BORE HOLE	LIST ANNULAR SEAL MATERIAL AN RANGE BY INTER	ND GRAVEI RVAL	PACK SIZE-	AMOUNT	METHO	D OF
<b>ERIA</b>	FROM	TO	8 76 tr	*(if using Centralizers for Artesian wells	indicate the	spacing below)	(cubic reet)		
IATH	20'	44	87/2"	NIA			00		
ARN									
INN									
3. AN									
FOR	OSE INTERI	NAL USE	2.1 >	1		WR-20	WELL RECORD &	& LOG (Version 09/2	2/2022)
FILE	NO. C -	468	54	POD NO. (		TRN N	NO. 758	TE PAGE	1 OF 2
LOC	ATION	Dam		11.27.214		WELL TAG II	JNO. LI	FAGE	TOF 2

Released to Imaging: 11/18/2024 2:45:07 PM

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Page	19	of	24

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	DEPTH (	feet bgl)		COLOR AND TYPE OF MATE	RIAL ENCOUNTERED -		WATER	ESTIMATED
	FROM	то	THICKNESS (feet)	INCLUDE WATER-BEARING CAVI	TIES OR FRACTURE ZONI fully describe all units)	ES	BEARING? (YES / NO)	WATER- BEARING ZONES (gpm)
	0.	1'	1	Topspil			Y CN	
	1'	20'	19'	Caliche			Y SR	
	20'	44'	24'	Kock			Э N	
							Y N	
							Y N	
TT							Y N	
WE							Y N	
GOF							Y N	
TO							Y N	
GIC	2						Y N	
OTO							Y N	
OGE							Y N	
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4. H)					1 		Y N	
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							Y N	
	METHOD U	JSED TO ES	STIMATE YIELD	OF WATER-BEARING STRATA: BAILER OTHER – SPECIFY:	Not Tested	TOTAL WELL	ESTIMATED YIELD (gpm):	
NC	WELL TES	T TEST STAR	RESULTS - ATTA T TIME, END TIM	ACH A COPY OF DATA COLLECTED DU ME, AND A TABLE SHOWING DISCHAR	JRING WELL TESTING, IN GE AND DRAWDOWN OV	CLUDINC ER THE T	G DISCHARGE N TESTING PERIC	METHOD, DD.
VISIO	MISCELLA	NEOUS INI	FORMATION:					
PER								
G SU		0			(	15E OII	SEP 6 2023 P	MT:31
; RI	(	Tohr	2 Noll	15				
rest	PRINT NAM	AE(S) OF D	RILL RIG SUPER	VISOR(S) THAT PROVIDED ONSITE SU	PERVISION OF WELL CON	NSTRUCT	TON OTHER TH	IAN LICENSEE
5								
RE	THE UNDE	RSIGNED I	HEREBY CERTIF	IES THAT, TO THE BEST OF HIS OR HE ESCRIBED HOLE AND THAT HE OR SE	ER KNOWLEDGE AND BEI IE WILL FILE THIS WELL	LIEF, THE RECORD	E FOREGOING I WITH THE STA	S A TRUE ANI ATE ENGINEEI
ATU	AND THE F		LDER WITHIN 3	DAYS AFTER COMPLETION OF WELL	DRILLING:			
IGN	Δ	11	low	TI NULS		6	19-27	
		SICNAT		VOW IVOLLI /		0-2	20 43 DATE	
-	v	SIGNAT	OKE OF DRILLE	K / FRINT SIGNEE NAME			DATE	
-								
FOI	R OSE INTER	NAL USE			WR-20 WE	ELL RECC	DRD & LOG (Ver	rsion 09/22/2022
FOI	R OSE INTER E NO. C-	ALUSE	34-Po	POD NO.	TRN NO.	738	0RD & LOG (Ver 8813	rsion 09/22/2022

From:	Wells, Shelly, EMNRD
To:	<u>Eric Friedman</u>
Cc:	Randy Gonzalez; Emily Danger; Nick Danger; Bratcher, Michael, EMNRD
Subject:	RE: [EXTERNAL] Fwd: FW: The Oil Conservation Division (OCD) has approved the application, Application ID: 394489
Date:	Monday, November 18, 2024 11:37:00 AM

Hi Eric,

OCD has reviewed the submitted comments. I will address each point below:

- 1. 19.15.29.11(A)5(c) NMAC does not apply based on depth to groundwater information.
- 2. Due to the historical nature of this release, all delineation samples collected must be submitted to a laboratory for analysis.
- 3. The amount of delineation samples collected is not up for debate. Based on the Google Earth imagery the day after the release occurred, the release area spread further east on the pad than your proposed delineation sampling locations cover. OCD wants all locations identified to be sampled.
- 4. The background chloride locations need to be both upgradient and higher elevation than the pad itself. The proposed locations of B-98 and B-99 are less than or equal in elevation to the pad itself and as such those areas are not acceptable.

Sincerely,

Shelly

Shelly Wells \* Environmental Specialist-Advanced Environmental Bureau EMNRD-Oil Conservation Division 1220 S. St. Francis Drive|Santa Fe, NM 87505 (505)469-7520<u>|Shelly.Wells@emnrd.nm.gov</u> http://www.emnrd.state.nm.us/OCD/

From: Eric Friedman <e.friedman@sqenv.com>

Sent: Friday, November 8, 2024 10:55 AM

To: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>

**Cc:** Randy Gonzalez <r.gonzalez@sqenv.com>; Emily Danger <e.danger@sqenv.com>; Nick Danger <n.danger@sqenv.com>

**Subject:** [EXTERNAL] Fwd: FW: The Oil Conservation Division (OCD) has approved the application, Application ID: 394489

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

### Shelly,

Attached is a response to the comments you provided for the Myrtle Myra SWD #001 Well (API No. 30-015-21515) Site Assessment Plan. This includes the assessment of incident nMLB1122141620. Please let myself andor Randy Gonzalez know if you have any questions or would like to discuss the contents of this letter.

thank you,	Eric Friedman, P.G.
?	SQ Environmental, LLC
	E.Friedman@SQEnv.com
	www.SQEnv.com

561-906-8028

------ Forwarded message ------From: **Randy Gonzalez** <<u>r.gonzalez@sqenv.com</u>> Date: Tue, Oct 29, 2024 at 1:17 PM

Subject: FW: The Oil Conservation Division (OCD) has approved the application,

Application ID: 394489

To: Eric Friedman < e.friedman@sqenv.com >

Cc: Emily Danger < e.danger@sqenv.com >, Nick Danger < n.danger@sqenv.com >

See NMOCD comments on the Myrtle Myra Site Assessment Plan below.

Randy Gonzalez SQ Environmental 512-541-6028

From: OCDOnline@state.nm.us [mailto:OCDOnline@state.nm.us]
Sent: Tuesday, October 29, 2024 11:30 AM
To: r.gonzalez@sqenv.com
Subject: The Oil Conservation Division (OCD) has approved the application, Application ID: 394489

To whom it may concern (c/o Randy Gonzalez for SELECT AGUA LIBRE MIDSTREAM, LLC),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nMLB1122141620,

with the following conditions:

- Site Assessment Approved with the Following Conditions: 1) If nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, data must be no more than 25 years old, and well construction information must be provided. OSE-POD C-04251 is.5 miles away and has a depth to groundwater of exactly 100 feet, therefore Table 1 51 feet-100 feet RRALs apply. Pursuant to 19.15.29.11(A)5(c) NMAC, "if the release occurred outside of a lined containment area and is in an area where depth to ground water is greater than 50 feet and less than or equal to 100 feet, the responsible party must delineate the vertical extent of the release to the greater of 600 mg/kg chloride or background level, if the release is of an unknown quantity or results in greater than 200 barrels of unrecovered produced water."
- 1 continued) Samples should be grab samples collected at surface, 1', 2', 3' and 4'. Due to this being a historical release, all samples obtained must be submitted to a laboratory for analysis. In addition, samples must be tested for all Table 1 constituents.
- 2) It is noted that the Area of Impact shown on pg. 4, Figure B is larger than the area of impact that is drawn on Figure 3. Referring to Figure B, the ruler box located to the left of the yellow polygon is covering more impacts. It appears the berm was breached as there are scraping striations seen off pad on the west side that are similar to the scrapes on pad. This area will also require delineation. OCD will email a kmz file or a screenshot providing suggested sampling locations as the 3 provided in this Site Assessment Plan are not enough to delineate such a large release area.
- 3) The proposed background sample locations are not acceptable. It looks like you may need to collect them greater than 100 feet off pad (which is completely acceptable in this situation), well away from any disturbed areas, and upgradient. They must be tested for all Table 1 constituents as well. Submit remediation plan to OCD by 1/27/2025.

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you, Shelly Wells Environmental Specialist-A 505-469-7520 Shelly.Wells@emnrd.nm.gov

### New Mexico Energy, Minerals and Natural Resources Department

.

1220 South St. Francis Drive Santa Fe, NM 87505 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

Operator:	OGRID:
BASIC ENERGY SERVICES, LP	246368
P.O. Box 1375	Action Number:
Artesia, NM 88210	404444
	Action Type:
	[REPORT] Alternative Remediation Report (C-141AR)

#### CONDITIONS

Created By Condition scwells None CONDITIONS

Action 404444

Condition Date

11/18/2024