

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**Ken McQueen**  
Cabinet Secretary-Designate

**Matthias Sayer**  
Deputy Cabinet Secretary

**David R. Catanach, Division Director**  
Oil Conservation Division



March 10, 2017

Robert Stranahan  
1314½ Madrid Rd.  
Santa Fe, NM 87505

Tom Ragsdale  
Siana Oil and Gas Co., LLC  
12012 Wickchester Lane, Ste. 410  
Houston, Texas 77079

**Re: Siana Delineation Reports Received March 7, 2017**

Dear Messrs. Stranahan and Ragsdale:

Regarding the Delineation Investigation Reports submitted to the Oil Conservation Division (OCD) on March 7, 2017, the OCD cannot accept them as fulfilling the terms of the October 6, 2016 Amended Settlement Agreement. The information received did not satisfy the obligations under the approved work plan.

The approved work plan required complete hydrocarbon profiles of soil borings at 2-foot below ground surface (bgs) and at 5-foot bgs intervals. The information submitted did not provide analysis for every borehole required.

Further, the hydrocarbon profiles were supposed to be obtained through laboratory analysis for BTEX by SW-8021 and TPH by method SW-8015. For the boreholes that were submitted, no complete hydrocarbon profile was included.

This incomplete information did not fulfill the reporting requirements as established in the September 23, 2016 approved work-plan and OCD does not accept it as fulfilling the terms of the Amended Settlement Agreement. Therefore, the OCD will not revise any deadlines for this requirement.

Please submit a complete information to the OCD Environmental Bureau as soon as possible as stated in the approved work plan. If Siana or its contractor return to the sites to perform additional work, please provide the OCD Environmental Bureau with 24-hours' notice before work is to commence.