

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Mark Larson"; "Mann, Ryan"](#)  
**Cc:** ["merch merchant"; Ashton Thielke](#)  
**Subject:** RE: 1RP-3979 - Devon Leases Illegal Dumping  
**Date:** Tuesday, May 1, 2018 8:11:00 AM

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Good morning Mr. Larson/Merchant:

Thank you for your prompt response regarding 1RP-3979. Please be advised that a caliche layer is not an acceptable rationale for incompleteness of vertical delineation. Pardon if I missed it, but there was no mention of a caliche layer in the delineation report. For the Dopplebock 8 State Com #1H release, based on the data presented, NMOCD will agree that no additional delineation is required and will grant closure to 1RP-3979, after NMSLO's revegetation and labeled photo documentation requirements are met.

Thanks,  
Olivia

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**From:** Mark Larson <Mark@laenvironmental.com>  
**Sent:** Monday, April 30, 2018 1:14 PM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** 'merch merchant' <penroc1961@hotmail.com>; Ashton Thielke <ATHielke@laenvironmental.com>  
**Subject:** RE: 1RP-3979 - Devon Leases Illegal Dumping

Dear Ms. Yu,

Although several attempts are made at each location we were unable to collect deeper samples at Dopplebock DP-6 and DP-7 due to refusal from subsurface conditions (caliche). This was included in the delineation plan.. Please let me know if you have additional questions.  
Mark

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, April 30, 2018 12:41 PM  
**To:** Mark Larson; 'MNaranjo@slo.state.nm.us'  
**Cc:** 'mymerch@penrocoil.com'; Mann, Ryan  
**Subject:** RE: 1RP-3979 - Devon Leases Illegal Dumping

Dear Mr. Larson:

Thank you for the delineation data for the releases under 1RP-3979. In the approved delineation report, each delineation sample location were to be collected at 1 ft. intervals down to 4 ft. in depth for the release area. In general, the provided data is sufficient. However, for Dopplebock 8 State Com #1H release area, both DP-6 and DP-7 only have 0-1 ft. of data. Please provide a rationale.

NMSLO may have additional concerns.

Thanks,

Olivia

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**From:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>

**Sent:** Thursday, April 5, 2018 11:25 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; 'MNaranjo@slo.state.nm.us' <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>

**Cc:** 'mymerch@penrocoil.com' <[mymerch@penrocoil.com](mailto:mymerch@penrocoil.com)>

**Subject:** Re: 1RP-3979 - Devon Leases Illegal Dumping

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of Penroc Oil Corporation (Penroc), submits the delineation report for produced fluid releases resulting from illegal dumping at four (4) locations (Altbeir State 10 1H, Dopplebock 8 State COM 1, Dunkel 7 State 1H and Guadalcanal State COM 1H) in Lea County, New Mexico. The illegal dumping occurred while the leases were owned by Devon Energy in 2015. Penroc acquired the leases on January 1, 2017. Based on the results of investigations performed according to a delineation plan approved by the OCD and SLO, Penroc respectfully requests no further action for the illegal dumping. Your approval of this request is appreciated. Please use the link below to download the delineation report. Please contact MY "Merch" Merchant with Penroc at (575) 492-1237 or [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com) or me if you have any questions.

**Link:** <https://files.acrobat.com/a/preview/d9e001b0-56eb-4e25-bf01-f536fb257b2d>

Respectfully,

Mark J. Larson, P.G.  
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Cell – 432- 556-8656  
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