

**From:** Mann, Ryan  
**To:** [Yu, Olivia, EMNRD](#); [Mark Larson](#); [Naranjo, Mark](#)  
**Cc:** ["mymerch@penrocoil.com"](mailto:'mymerch@penrocoil.com')  
**Subject:** RE: 1RP-3979 - Devon Leases Illegal Dumping  
**Date:** Monday, April 30, 2018 2:11:59 PM

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Mr. Larson,

In order to issue closure from NMSLO the surface will need to be adequately revegetated. The report states that some of the areas have improved vegetation, and some do not. Please provide clearly labeled photos in the areas where the spills occurred, depicting the current conditions. The photos in the report are from the initial report, I believe. Let me know if you have any questions.

Ryan Mann  
Remediation Specialist  
Field Operation Division  
(575) 392-3697  
(505) 699-1989  
New Mexico State Land Office  
2827 N. Dal Paso Suite 117  
Hobbs, NM 88240

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, April 30, 2018 11:41 AM  
**To:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** 'mymerch@penrocoil.com' <[mymerch@penrocoil.com](mailto:'mymerch@penrocoil.com')>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>  
**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  
**Sent:** Thursday, April 5, 2018 11:25 AM  
**To:** Yu, Olivia, EMNRD ; 'MNaranjo@slo.state.nm.us'  
**Cc:** '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.  
President/Sr. Hydrogeologist  
507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
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