

From: [Yu, Olivia, EMNRD](#)
To: ["Tyler Tupman"; Billings, Bradford, EMNRD](#)
Cc: [Oberding, Tomas, EMNRD](#); [Collins, Karen, EMNRD](#)
Subject: RE: Salado Draw C-147 Application Response
Date: Friday, July 28, 2017 10:11:00 AM
Attachments: image001.png

Dear Mr. Tupman:

NMOCD has reviewed the submitted documents, dated July 11, 2017, encompassing the C-147 Registration Package for Salado Draw Recycling Facility and two Recycling Containments (North & South). The recycling facility and two recycling containments will be located in Lea County; U/L K, Section 16, Township 26S, Range 33E.

NMOCD approval is given for the proposed Salado Draw Recycling Facility, North Recycling Containment, South Recycling Containment, and the Variance indicated (use of audible bird protection instead of netting). Please be advised that this email message serves as documentation for approval. A hard copy will not be sent.

The Recycling Facility is issued an identifier **1RF-16**, North Recycling Containment **1RF-17**, and South Recycling Containment **1RF-18**.

Monthly usage reports on the form C-148 are expected electronically to NMOCD- District I office. NMOCD also may ask for periodic updates on containment conditions and inspection logs. For future communications, please remember to include the identifier **1RF- 16, 1RF-17, and 1RF-18** for tracking and record-keeping purposes.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Tyler Tupman [mailto:ttupman@mewbourne.com]
Sent: Tuesday, July 11, 2017 1:46 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Oberding, Tomas, EMNRD

<Tomas.Oberding@state.nm.us>; Collins, Karen, EMNRD <Karen.Collins@state.nm.us>

Subject: RE: Salado Draw C-147 Application Response

Bradford,

Attached you will find the Salado Draw C-147 with all the changes requested.

A bore hole was conducted, I have attached a separate C-147 for the South containment and the specs for the bird deterrent device are included.

Let me know if this meets your requirements.

Thanks,

Tyler Tupman

Petroleum Engineer

Mewbourne Oil Company

Office: 575-393-5905

Cell: 575-390-3739

ttupman@mewbourne.com



From: Billings, Bradford, EMNRD [<mailto:Bradford.Billings@state.nm.us>]

Sent: Thursday, July 06, 2017 10:41 AM

To: Tyler Tupman

Cc: Yu, Olivia, EMNRD; Oberding, Tomas, EMNRD; Collins, Karen, EMNRD

Subject: RE: Salado Draw C-147 Application Response

Hello,

Thank you for your C-147 submittal. In general, concise and to the point and OCD appreciates this fact, and we wish to thank you for this effort.

OCD has reviewed this document and has the following requests. When the requests are accommodated, please resubmit the permit application(s).

1. At the top of the C-147 form proper, you will need to mark both Permit and Registration. For clarification, containments need to be permitted and the recycling facility itself is registered. So, as you submittal has both, both need to be indicated on C-147 Form.

2. In the Variance section, OCD requires more detail on which sonic control device will be used in lieu of netting. A copy of the commercial sheet on its' function will suffice. We need to be sure it has sufficient reach and decibel capacity, as well as having the sounds of appropriate predators to discourage the area bird population(s).
3. In review of the depth to water considerations the following: OCD is not comfortable with the potential for groundwater to be within fifty (50) feet of the bottom of the detailed containments. There is possibility based on your used trend map of water in the seventy(70)-eighty(80) foot range. As bottom of containments could be 20 feet or so from surface this brings it uncomfortable close to the 50 foot buffer. This in conjunction with Medium Karst area, and a relatively nearby ,albeit outside of siting requirements proper Playa lake, leads to the following request. OCD needs a boring placed, nominally in center region (or as close as possible), to where Mewbourne anticipates containment location(s). We would like to have a depth of seventy-five (75) feet from ground surface. There is no requirement to log the boring, but it would be appreciated if Mewbourne were to do so. Additionally, we request that the boring be left open hole for at least twenty-four (24) hours to assess any potential groundwater accumulation. Similar requests have been made to other companies in similar situations and the data generated has been most helpful.
4. As the drawings indicate two (2) containments (North and South), OCD requires that a separate C-147 request be made for both containments. There only needs to be one marked for Registration on the Facility, as we understand the singular facility will handle the recycling needs for both containments.

If there are any questions or need for clarification, please do not hesitate to contact Brad Billings in the Santa Fe OCD offices, at 505-476-3482, or with address on this email.

Again, OCD wants to thank you for your work effort on this issue, we do appreciate your time. As a suggestion, which has proven most beneficial, you might consider a draft submittal wherein specifics needs or issues can be identified and accommodated before formal submittal.

Sincerely,

Bradford Billings
EMNRD/OCD/Santa Fe
For District I-OCD