



2500 North Eleventh Street • Enid, OK 73701 • (580) 234-8780 • Fax (580) 237-4302 • www.envirotechconsulting.com

January 26th, 2022

Ms. Victoria Venegas
EMNRD – Oil Conservation Division
811 S. First Street
Artesia, NM 88210
(575) 909-0269
victoria.venegas@state.nm.us

RE: Request for Extension for Modification of the Closure Plan for the Matador Production Company Tiger Recycling Facility and Containment in Eddy County, New Mexico.

Dear Ms. Venegas:

ENVIROTECH ENGINEERING AND CONSULTING, INC. was retained by Matador Production Company to conduct the Closure and Sampling Activities for the above referenced facility in Eddy County, New Mexico. The facility received an approved C-147 permit on June 23rd, 2016. Per that approved Closure Plan, the following stipulations were approved:

1. Soil samples collected from areas for future containments may be used for evaluation of 'background' values at the time of closure. Possible adjustments to delineation needs and/or remediation needs may occur when incorporating said background values.

Matador has recently begun the Closure Process, and as such, had the area sampled and tested for Chloride per the approved Closure Plan. The sample results, attached herewith, indicate the need for remediation of the site prior to final closure of the site. However, at this time, Matador is currently working to submit a new C-147 for this facility. The maximum timeframe for the proposed new C-147 is 12-months. Please note that there are only ASTs at this facility; there is no in-ground impoundment present.

Matador understands the State of New Mexico's position on the importance of protecting natural resources such as freshwater. Matador intends to re-apply for the C-147 at this location in order to utilize this facility for recycled water; this would allow Matador to prevent the usage of approximately 1-million barrels of freshwater. Upon completion of the final activity, Matador would begin Closure Activities per the approved C-147 permit that will incorporate the original 2016 background sampling and remediation plans.

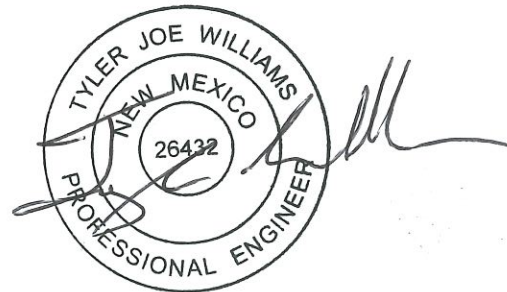
Matador understands that closure activities will require remediation and is prepared to do so. However, we request that we be allowed to postpone any further closure activities for 12-months. At that time, Matador would remediate the site, following the sampling plan per the approved Closure Plan, and submit all documentation to NMCOD District 2 for approval.

If you have any questions or would like to discuss this in more detail, please feel free to contact us at your convenience.

ENVIROTECH ENGINEERING & CONSULTING, INC.

A handwritten signature in black ink, appearing to read "Tyler Williams".

Tyler Williams, P.E.
President
Principal Engineer



26432—Expiration Date 12/31/2022



Date: January 10, 2022

To: Tyler Williams
President, P.E.
Envirotech Engineering & Consulting, Inc.
2500 N 11Th, Enid, OK 73701

From: Robert Nelson

Re: Matador - Tiger Recycling Facility Pit Soil Sample Results

Tyler,

On January 3, 2022, Larson & Associates, Inc. (LAI) personnel met with Matador Resources personnel at the Matador Tiger Recycling Facility (Site) in Eddy County, New Mexico, for the purpose of identifying underground lines in the area proposed for soil sample collection. On January 6, 2022, LAI personnel visited the Site to collect soil samples per the scope of work defined by Envirotech Engineering & Consulting, Inc. (Client). LAI personnel collected five (5) discreet soil samples underneath each of the five (5) containments from a depth of approximately zero (0) to four (4) inches below ground surface (bgs). Each sample was analyzed in the field utilizing a digital titration method. Titrations were halted where concentrations appeared greater than 3,000 milligrams per kilogram (mg/Kg). Wet areas were observed in sample locations 1A, 1B, and 2A and were included in the five (5) samples, per the Client plan. Below is a summary of the field analysis data for the above-mentioned sample locations:

Sample ID	Depth (Inches)	Chloride Concentration (mg/Kg)
1A	0 – 4	388
1B	0 – 4	>3,000
1C	0 – 4	2,050
1D	0 – 4	1,787.5
1E	0 – 4	1,932.5
2A	0 – 4	>3,000
2B	0 – 4	1,340
2C	0 – 4	575
2D	0 – 4	2,302.5
2E	0 – 4	477.5
3A	0 – 4	>3,000
3B	0 – 4	1,360
3C	0 – 4	407.5
3D	0 – 4	815
3E	0 – 4	812
4A	0 – 4	1,467.5
4B	0 – 4	90
4C	0 – 4	415
4D	0 – 4	482.5
4E	0 – 4	112.5
5A	0 – 4	1,577.5



5B	0 – 4	>3,000
5C	0 – 4	682.5
5D	0 – 4	150
5E	0 – 4	830

Field observations and chloride analysis (i.e., concentrations greater than 3,000 mg/Kg) indicated a possible release near sample locations 1B and 2A. Two (2) sample locations (1B and 2A) were deepened to depths of approximately five (5) feet bgs, with samples collected every 2.5 feet bgs, utilizing a Geoprobe® 7822DT direct push rig. Field analysis reported chloride concentrations in 1B and 2A at a depth of approximately five (5) feet bgs at 1,030 mg/Kg and 253 mg/Kg, respectively. These bore holes were deepened to a depth of approximately ten (10) feet bgs with samples collected every 2.5 feet (i.e., 7.5 feet bgs). Per the approved plan, these samples (i.e., 10 foot) were not analyzed utilizing field techniques, but have been reserved for possible laboratory analysis.

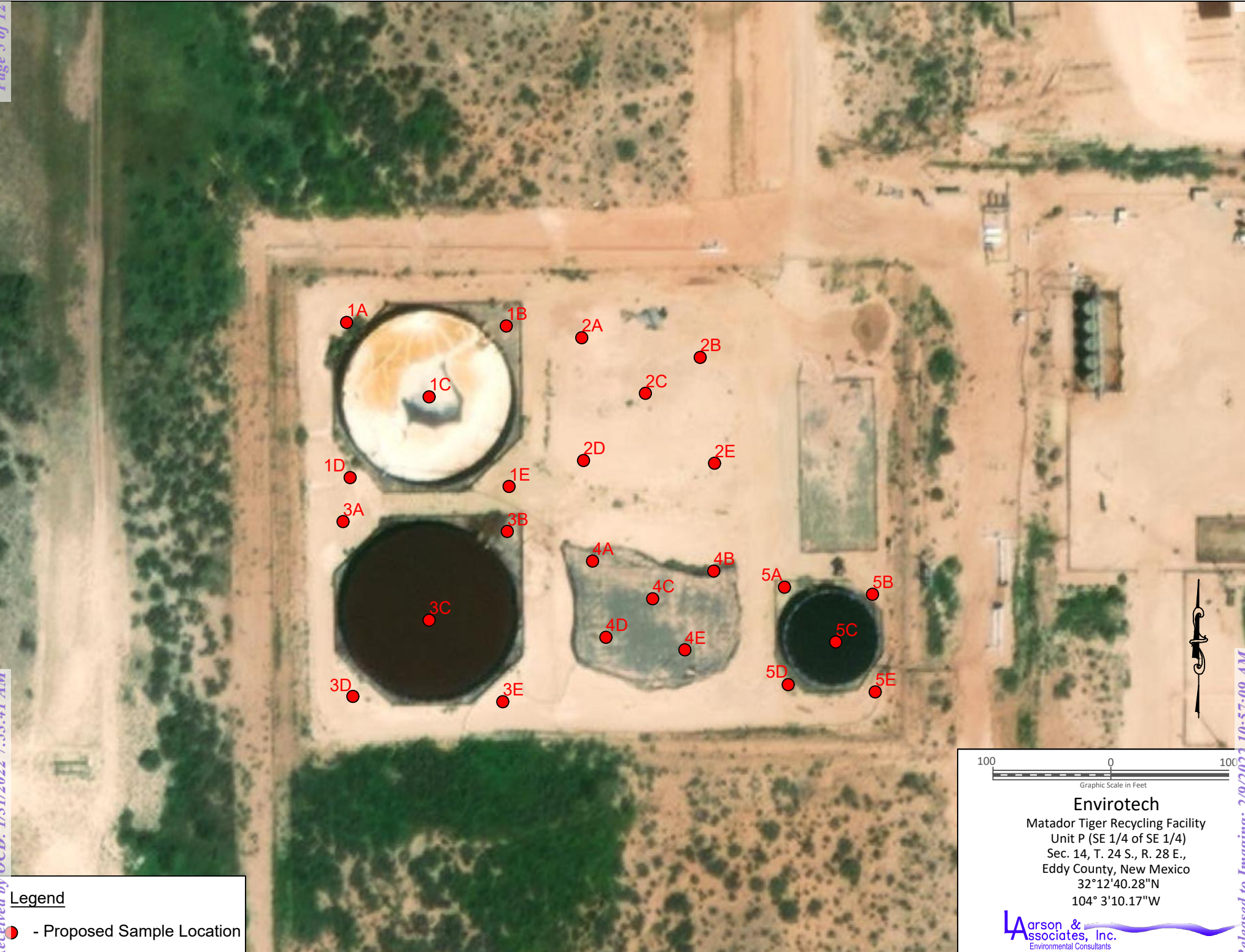
As previously mentioned, a release appeared to have occurred on the northern portion of the Site encompassing sample locations 1B and 2A. Chloride precipitate was observed on the surface with the spill migrating to the northwest and off the location into the adjacent pasture as indicated by the attached photographic documentation.

Please advise on how you would like to proceed with laboratory analysis. Please refer to the sample location map in Attachment A and photographic documentation in Attachment B.



Attachment A

Sample Location Map



Legend
● - Proposed Sample Location

Graphic Scale in Feet

Envirotech
Matador Tiger Recycling Facility
Unit P (SE 1/4 of SE 1/4)
Sec. 14, T. 24 S., R. 28 E.,
Eddy County, New Mexico
32°12'40.28"N
104° 3'10.17"W

Larson & Associates, Inc.
Environmental Consultants

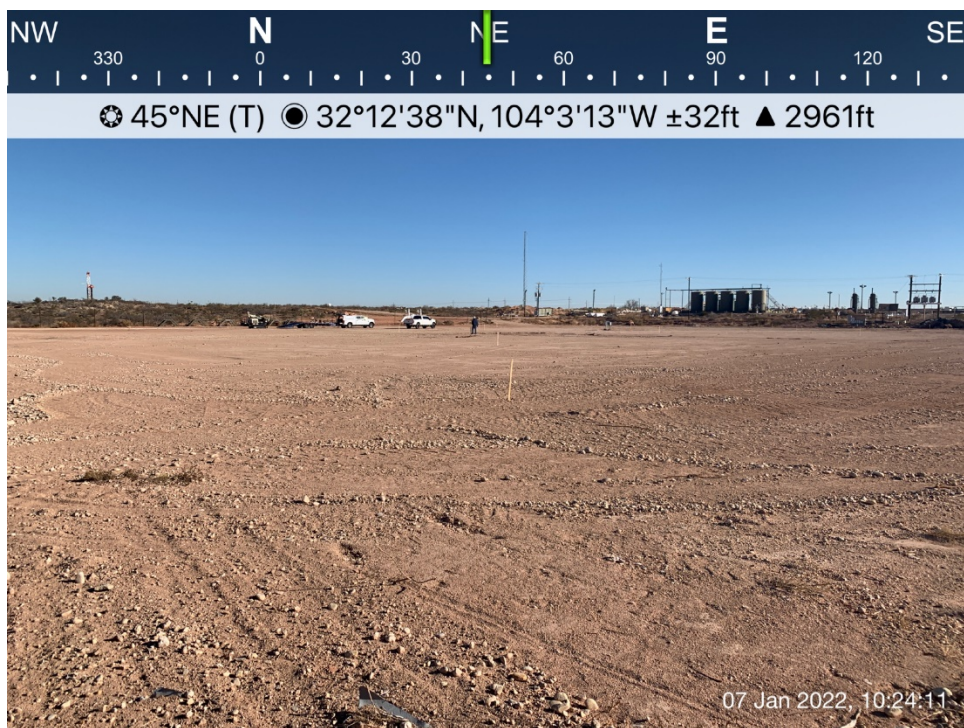
Figure 2 - Aerial Map



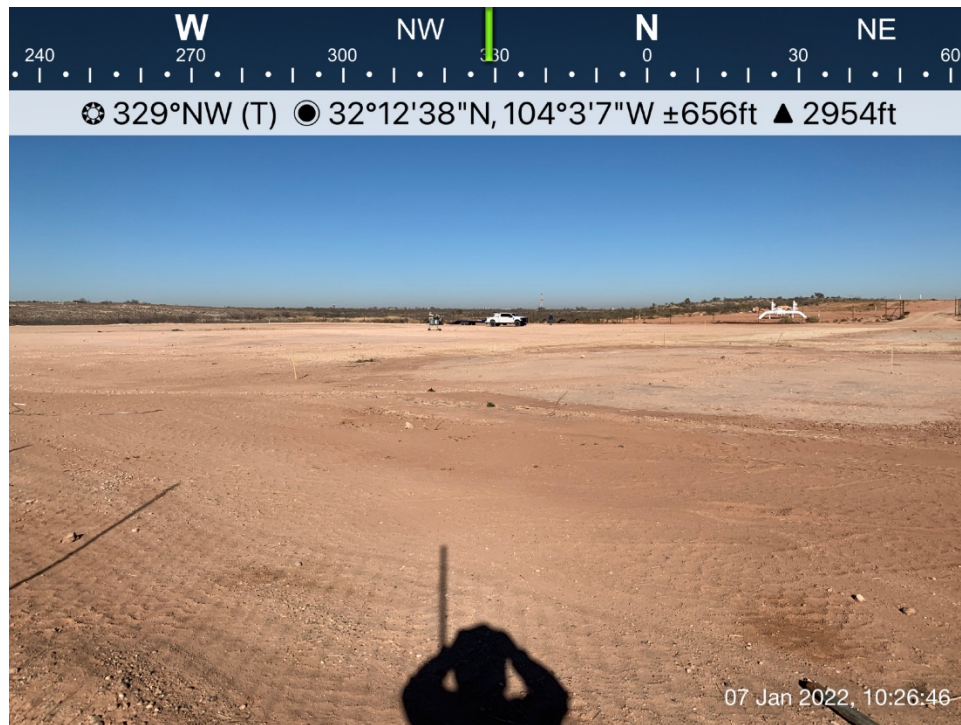
Attachment B
Photographic Documentation



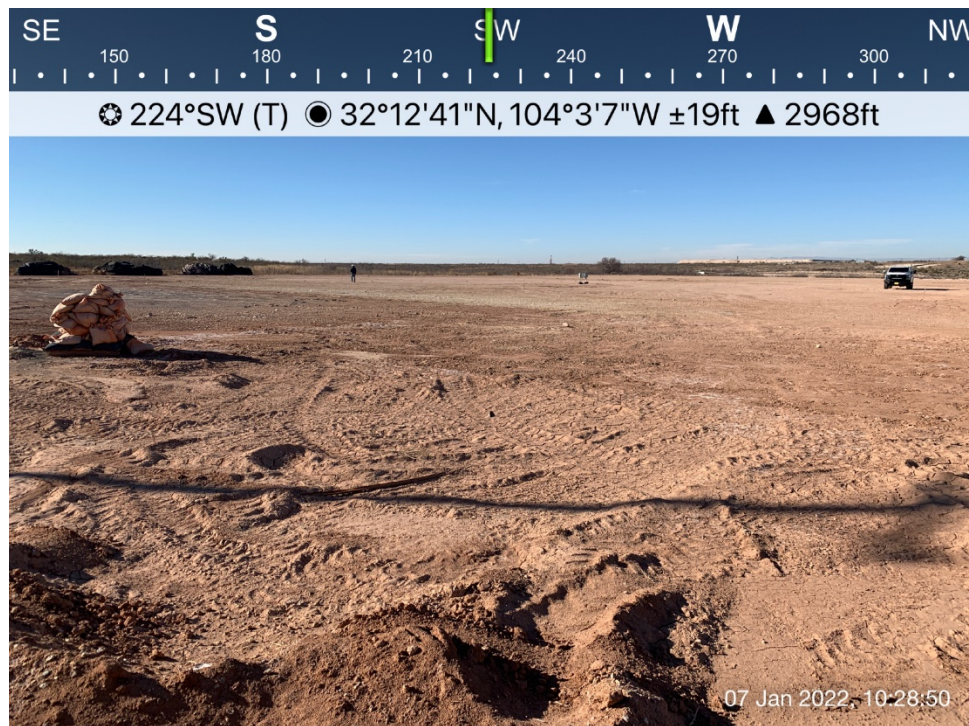
View Southeast of the Site



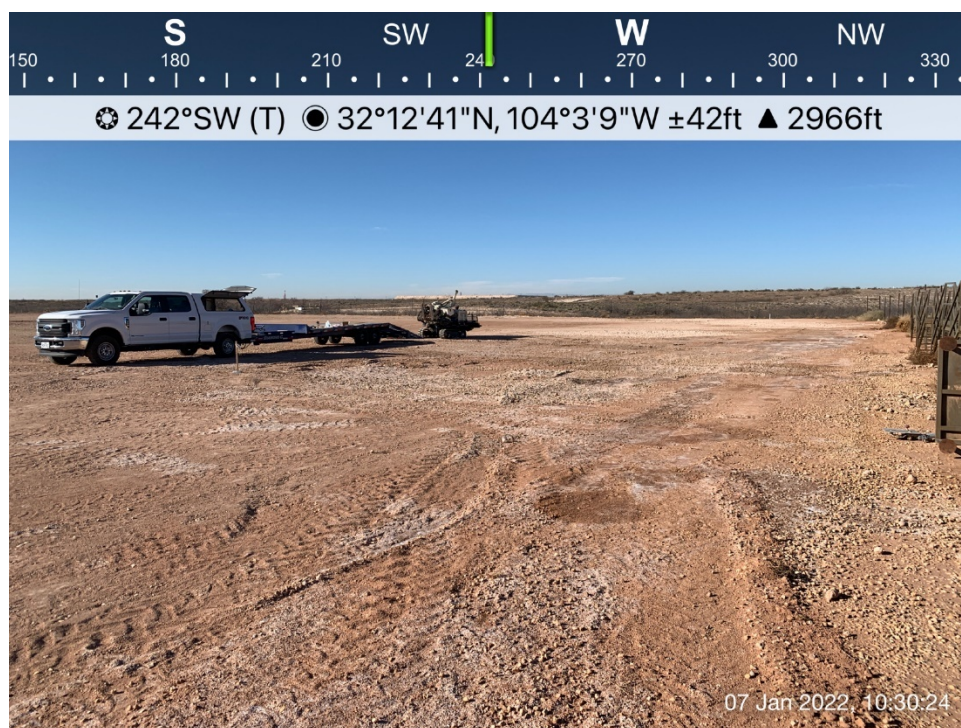
View Northeast of the Site



View Northwest of the Site



View Southwest of the Site



Chloride Precipitate on the Surface Encompassing Sample Location 2A



Chloride Precipitate on the Surface Encompassing Sample Location 1B



Washout with Chloride Precipitate on the Surface



Chloride Precipitate on the Surface in the Adjacent Pasture

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

COMMENTS

Action 76757

COMMENTS

Operator: MATADOR PRODUCTION COMPANY One Lincoln Centre Dallas, TX 75240	OGRID: 228937
	Action Number: 76757
	Action Type: [C-147] Water Recycle Long (C-147L)

COMMENTS

Created By	Comment	Comment Date
vvenegas	Given that an extension was never asked for in the allowed regulatory time frame, OCD deems this permit expired. Closure should have been completed within six months from the date the operator ceased operations from the containment(s) for use. OCD will allow for a 6-month extension to complete the closure of the 5 previously permitted containments. This request must be made within 2-weeks from receipt of this email (02/23/2022) and must submit the extension request online and include Form C-147 Long, with the box "Modification" checked and "Extension for Modification of the Closure Plan for 2RF-106" written as the explanation of "Other." Matador must conduct the closure as per the conditions/stipulations given by OCD. If MATADOR PRODUCTION COMPANY [228937] chooses to build a new containment(s) at this site, then Matador will be required to submit a new application for the proposed ASTs @ this location and OCD will issue a new Administrative Order number these containments.	2/9/2022

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