

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, March 23, 2011 9:34 AM
To: 'dadkins@talonlpe.com'; 'Michael Stubblefield'
Subject: Legacy Reserves SRLU 1 Release

Reference: Legacy Reserves * South Red Lake II Ut 001 * 30-015-00653 * C-36-17s-27e * Eddy County, New Mexico

NMOCD Reference: **2RP-604**

Greetings,

The New Mexico Oil Conservation Division District 2 Office (OCD) is in receipt of a "Soil Assessment and Remediation Work Plan" (work plan) proposal for remediation of soils contaminated due to a release of produced fluids at or near the above referenced well site. The release occurred on or about 2/8/2011. The work plan describes the local surface and shallow geology as consisting of silty soils underlain by sand stone and caliche layers. This geology is described as being an impermeable barrier to the migration of released fluids. While this type soil matrix may be an impediment to migration, OCD does not, typically, consider caliche to be an absolute impermeable barrier. The work plan does refer to encountering hard rock at shallow depths, which could be considered impermeable, however, typically in these type areas, fluids tend to run across rock, migrating downward in fractures and/or pooling in areas with a higher permeability. In reviewing the analytical data presented, and, considering the description of the release flowpath, contaminant migration does not appear to be an issue at this site.

For future submittals, please include a site diagram showing point of release, flowpath, and especially, sample points in relation to well pads, pasture areas, facility equipment/appurtenances, and any other pertinent land, surface or geologic features. A table showing analytical data and depths is also helpful and tends to speed up the review process.

The work plan is approved with the following conditions and/or stipulations:

- Notify OCD 48 hours prior to commencement of remedial operations.
- Notify OCD 48 prior to obtaining samples where the analyses will be submitted to OCD.
- Material used for backfilling excavations must be clean.
- Material used for backfilling must be, as near as practicable, to the same type as was removed.
- Submit a closure report and Final Report Form C-141 upon satisfactory completion of project.

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

If you have any questions or concerns, please contact me.

Mike Bratcher

NMOCD DISTRICT 2
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mike.bratcher@state.nm.us

Bratcher, Mike, EMNRD

From: Microsoft Outlook
To: dadkins@talonlpe.com; Michael Stubblefield
Sent: Wednesday, March 23, 2011 9:34 AM
Subject: Relayed: Legacy Reserves SRLU 1 Release

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

dadkins@talonlpe.com (dadkins@talonlpe.com)

[Michael Stubblefield](mailto:mstubblefield@talonlpe.com) (mstubblefield@talonlpe.com)

Subject: Legacy Reserves SRLU 1 Release

Bratcher, Mike, EMNRD

From: dadkins@talonlpe.com
Sent: Wednesday, March 23, 2011 9:44 AM
To: Bratcher, Mike, EMNRD
Subject: Delivered: Legacy Reserves SRLU 1 Release
Attachments: ATT00001

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Bratcher, Mike, EMNRD

From: mstubblefield@talonlpe.com
Sent: Wednesday, March 23, 2011 9:48 AM
To: Bratcher, Mike, EMNRD
Subject: Delivered: Legacy Reserves SRLU 1 Release
Attachments: ATT00001

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