From:
 Griswold, Jim, EMNRD

 To:
 scox@limerockresources.com

 Cc:
 Bratcher, Mike, EMNRD; Randy Hicks

Subject: Variance for secondary liner specifications at All Thorn Multi-well Fluid Management Pit

Date: Thursday, July 03, 2014 5:21:37 PM

Mr. Cox,

The variance request submitted on behalf of Lime Rock Resources by RT Hicks Consultants, Ltd. dated 5/12/14 wherein 30-mil LLDPE or LLDPE-R be used as a secondary containment liner material is approved. It has been determined that 30 mil LLDPE is equivalent or superior to 30 mil flexible PVC, though obviously not as robust as 60 mil HDPE. 60 mil HDPE is required for the primary liner. Both liners should be installed as recommended by the manufacturer and in accordance with 19.15.17.11 NMAC. The secondary liner must be tested using the Electrical Leak Location Survey recommended by your engineer.

Variance requests are approved or denied on a case-by-case basis and this approval is only pertinent to the All Thorn pit and only with respect to the secondary liner material.

Please keep a copy of this approval for your files as no hardcopy will be sent. I had verbally advised Mr. Hicks on June 27th of the approval, but forgive my tardiness in sending this follow-up email. Thank you.

Jim Griswold

Environmental Bureau Chief EMNRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505.476.3465 email: jim.griswold@state.nm.us