

From: [Spencer Cox](#)
To: [Griswold, Jim, EMNRD](#)
Cc: [Bratcher, Mike, EMNRD](#); [Randy Hicks](#)
Subject: RE: Variance for secondary liner specifications at All Thorn Multi-well Fluid Management Pit
Date: Monday, July 07, 2014 6:19:06 AM

Mr. Griswold, thank you very much for the notification. I greatly appreciate your time and the OCD's effort in the evaluation and approval of the variance. Please let me know if I can further assist in any way.

Thanks,

Spencer C. Cox

Production Engineer



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From: Griswold, Jim, EMNRD [mailto:Jim.Griswold@state.nm.us]
Sent: Thursday, July 03, 2014 6:22 PM
To: Spencer Cox
Cc: Bratcher, Mike, EMNRD; Randy Hicks
Subject: Variance for secondary liner specifications at All Thorn Multi-well Fluid Management Pit

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

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