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January 2, 2019

Mr. Gabriel C. Wade, Deputy Director  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Hand Delivered

**Re: NMOCD Case No. 16069; Application of LOGOS Resources II, LLC For Extension of Authorization To Operate The Rosa Unit Recycling And Containment Facility And For Exception From The Closure Requirements of NMAC 19.15.34.13, Rio Arriba County, New Mexico; Order No. R-20253**

Dear Mr. Wade:

On behalf of LOGOS Resources II, LLC and LOGOS Operating, LLC, we respectfully request a thirty-day extension of time to provide the Division's District III Office with a proposed procedure for monitoring the leak detection system that is a component of the Rosa Unit Containment and Recycling Facility located in Section 30, Township 31 North, Range 5 West, NMPM in Rio Arriba County.

On December 3, 2018, after hearing, the Division entered its Order granting LOGOS's application for an order extending the effective date of a determination of cessation of operations and suspending the Closure and Site Reclamation Requirements for Recycling Containments under Rule 19.15.34.14(A). The Order directed the Operator to, *inter alia*, review the previous operator's leak detection system and submit a procedure providing "quantifiable parameters" along with a procedure for quarterly sampling of fluids. The proposed procedure is to be submitted to the District III Office within thirty days following the date of the order. **Order No. R-20253, Order ¶ (4) (December 3, 2018).**

Although the Order was entered on December 3, 2018, it was not made available to LOGOS or published on the Division's website until December 11, 2018. The delay was no doubt attributable to the unprecedented volume of applications and orders the Division was tasked with processing in 2018. Further, with the advent of the holidays, key staff from LOGOS's environmental and operations departments were out of position and have not had time to adequately confer regarding appropriate quantifiable parameters and quarterly sampling in the thirty days since the Order was issued. For these reasons, LOGOS requests and additional thirty

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days until February 1, 2019 to prepare and submit a proposed procedure for approval by the District III Office.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Scott Hall". The signature is written in a cursive, flowing style with a prominent horizontal line across the middle.

J. Scott Hall

Icc: John Bruner  
Chris Jeffus

JSH