

Bratcher, Mike, EMNRD

From: Emily Sirgo <emily@mogc-kec.com>
Sent: Tuesday, March 21, 2017 1:15 PM
To: dadkins@talonlpe.com
Cc: Bratcher, Mike, EMNRD
Subject: Maverick Operating- Poker Laker 36
Attachments: poker lake 36 c141.pdf

Hi David, thanks for helping us out. See the note below from Mike about what he requires (samples, testing, site diagrams, ect) and the C141 attached outlining the incident at poker lake unit #36 disposal lease. I've CC'd Mike in case he has anything to add so that we can get this issue resolved.

Thanks,

Emily C. Sirgo

Maverick Oil & Gas Corporation

1004 North Big Spring Street, Suite 121
Midland, Texas 79701
432-682-2500 (o)
432-570-1062 (f)

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, March 15, 2017 10:11 AM
To: Emily Sirgo <emily@mogc-kec.com>
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Subject: RE: Poker Laker 36 C-141

Emily,

We do request notification be provided so we may witness if possible. Any NELAP certified lab will work, however, unless you have someone onboard that is experienced in proper methodologies for obtaining samples, and providing sites diagrams, I would strongly suggest retaining a third party environmental company.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia NM 88210
575-748-1283 Ext 108
mike.bratcher@state.nm.us

From: Emily Sirgo [mailto:emily@mogc-kec.com]
Sent: Wednesday, March 15, 2017 9:00 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: RE: Poker Laker 36 C-141

Ok. Does the OCD need to witness the samples being taken? Is there a particular lab they need to be sent to?

Emily C. Sirgo

Maverick Oil & Gas Corporation

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Midland, Texas 79701

432-682-2500 (o)

432-570-1062 (f)

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Tuesday, March 07, 2017 9:49 AM

To: emily@mogc-kec.com

Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Subject: Poker Laker 36 C-141

RE: Maverick Operating LLC * Poker Lake Ut 36 * **2RP-4136** * DOR: Discovered 2/26/17

Ms. Sirgo,

OCD has received the USPS mailed copy of a Form C-141 for the above referenced release, marked Final Report. At this time, the C-141 will be accepted and processed as an **Initial Report** only. OCD encourages "immediate response actions" in regard to produced fluid releases, where and when possible, however, a release will not be closed until, at a minimum, analytical data has been obtained from the affected area to confirm contaminants have been removed to acceptable levels. More recently, OCD has instituted "Conditions of Approval" that are sent out with each Initial C-141 as they are processed. This document is intended to provide the operator with some idea of what OCD requires for spill remediation. I will attach a copy to this correspondence, and if you have any questions, contact me and I will attempt to explain it.

It is my understanding that Maverick has removed the contaminated material identified at this site. Please submit a site diagram showing the release area in relation to the facility, along with the location of sample points. Samples are to be obtained in a manner that will encompass the release area, with samples also obtained just outside the boundaries of the release area to confirm lateral definition. Samples need to be obtained and sent to an accredited lab under proper conditions, and chain of custody protocol, and tested for BTEX, TPH (GRO/DR0) and chloride content. Once the data has been obtained by Maverick, OCD would prefer the data be put in a "table format" and sent to the appropriate District office, along with the site diagram and the lab data. OCD may consider the release incident closed, or request additional work and/or data.

The link provided below is to an OCD publication titled "Guidelines for Remediation of Leaks, Spills and Releases". It will provide some insight into OCD requirements for release events.

http://www.emnrd.state.nm.us/OCD/documents/7C_spill1.pdf

There are current efforts under way to make some changes to the spill guidance with possibly a rule being formulated, but at this time, OCD is administering spill events utilizing existing Rules and Guidelines. On Federal sites, OCD works with BLM on remediation requirements. In some instances, there may be minor modifications and/or additions from either agency, but the operator must report to, and comply with, both agencies.

If you have any questions or I can assist in any way, please contact me.

Mike Bratcher

NMOCD District 2

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