

State of New Mexico
Energy, Minerals and Natural Resources Department

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Governor

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Cabinet Secretary

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Oil Conservation Division



BY CERTIFIED AND ELECTRONIC MAIL

Mr. Cliff Humphreys
VP of Completions Matador Production Company
One Lincoln Center 5400 LBJ Freeway Suite 1500
Dallas, TX 75240
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Mr. Humphreys:

The Oil Conservation Division has reviewed Matador Production Company's Application and Form C-147 for the proposed Rodney Robinson Recycling Facility. The Application has been assigned OCD Administrative Order number 1RF-455. The Application is denied because it does not meet the requirements of 19.15.34 NMAC. The Application is missing the following required information.

Operators must design, construct, operate, and close recycling facilities and containments according to 19.15.34 NMAC. The following items in the Rodney Robinson application are not designed in compliance with 19.15.34 NMAC:

- the above-ground containment vertical slope and lack of an anchor trench (19.15.34.12.A (2) NMAC);
- the above-ground containment lack of an anchor trench and anchors (19.15.34.12.A (3) NMAC);
- the in-ground earthen containment 40 mil HDPE secondary liner 19.15.34.12.A.(4) NMAC);
- the above-ground containment 40-mil LLDPE string-reinforced LLDPE double liner (19.15.34.12.A.(4) NMAC); and
- the 8-foot tall game fence (19.15.34.12.D.(2) NMAC).

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19.15.34.16 NMAC allows operators to file a written request for a variance from any requirement of these rules. Matador can resubmit these items, so they comply with the requirements of 19.15.34 NMAC, or request a variance to the requirements of 19.15.34 NMAC. As part of the variance demonstration requirements of 19.15.34.16.A NMAC, variance requests from the primary and secondary liners and the leak detection system requirements of 19.15.34.12.A (4) NMAC must include a statement from a registered professional engineer demonstrating that the proposed variance will provide equal or better protection of fresh water, public health and the environment.

The following discrepancies were found in the application during the review process:

- The orientation and location of the containments and treatment area in the engineering drawings (sheet C102, C105, C106, and C110) does not match the orientation and location of the containments and treatment area in the geotechnical investigation (bore location map).
- The Geotechnical Investigation states: "Soil Boring No. 4 was advanced to depth of 60-feet below the existing subgrade to locate ground water if present". However, the geotechnical boring log shows that Borehole No. 4 only goes 21.5 feet, instead of 60 feet.

Matador should provide an updated engineering drawing set and/or geotechnical investigation with these discrepancies corrected.

The following information could not be found in the application during the review process.

- The leak detection system (200-mil geonet) for the above-ground containment is described in the design and construction plan, but it is not detailed in the engineering drawings or in the above-ground containment drawings in the Equipment and Manufacturer's Specifications.

Matador should provide a detailed drawing of the above-ground containment leak detection system.

If you have any questions please contact Victoria Venegas at (575) 909-0269 or Victoria.Venegas@state.nm.us.

Resubmittals of the entire application package should be sent to the OCD Environmental Bureau mailbox at OCD.Enviro@state.nm.us.

Sincerely,



Mike Bratcher
Southern District Manager