

Leking, Geoffrey R, EMNRD

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30-025-39593

**From:** Lynx Petroleum [lynxpet@leaco.net]  
**Sent:** Wednesday, April 07, 2010 11:32 AM  
**To:** Leking, Geoffrey R, EMNRD  
**Subject:** RE: Lusk "31" Federal No. 3 C-144  
**Attachments:** Lusk 31 Fed No. 3 Cuttings Analysis.pdf; Lusk 31 Fed No. 3 Sample Location.pdf

G:

Per our meeting this A.M. attached are the cuttings sample analysis methods and a modified pit diagram showing the sample point with an 'X'. Give a shout if you need anything else.

Larry

CORRECTIONS TO ORIGINAL C-144 WHICH WAS APPROVED 04/08/10 &  
APPROVED W/ AMMENDMENTS ON 06/16/10.

**Larry Scott**

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**From:** Leking, Geoffrey R, EMNRD [GeoffreyR.Leking@state.nm.us]  
**Sent:** Tuesday, January 19, 2010 2:50 PM  
**To:** lynxpet@leaco.net  
**Subject:** Lusk "31" Federal No. 3 C-144

Larry

The following comments must be addressed before the C-144 can be approved:

Box 17. Siting Criteria - Bullet 3 - Ground water is more than 100 feet below the bottom of the buried waste - 375'

This box should be marked yes - ground water at the site is at approximately 375' below ground surface - this data can be obtained at NMOCD-Hobbs offices - it may also be available from the NM Office of the State Engineer - iWATERS database search or USGS - even though the water is greater than 100' deep, the depth must be acknowledged and further criteria met that apply to ground water at this depth.

Box 18. On-Site Closure Plan Checklist - Bullet 4 - Construction/ Design Plan of Temporary Pit - IN PACKAGE

This box should be marked and a construction/design plan including a diagram of the proposed pit's dimensions and design included. The company stated that a diagram was included with the current submission, but the reviewer could not locate it in the package received.

Box 18. On-Site Closure Plan Checklist - Bullet 5 - Protocols and Procedures - CUTTINGS WILL SUPPORT

This box is marked, but the closure plan should include language that satisfies NMAC 19.15.17.13F.(2)(b) which states; "Prior to closing an existing temporary pit or to placing the contents from a drying pad associated with a closed-loop system into a temporary pit that the operator constructs for disposal, the operator shall stabilize or solidify the contents to a bearing capacity sufficient to support the temporary pit's final cover. The operator shall not mix the contents with soil or other material at a mixing ratio of greater than 3:1, soil or other material to contents."

Box 18. On-Site Closure Plan Checklist - Bullet 7 - Waste Material Sampling Plan - WILL SEND

Per NMAC 19.15.17.13 F.(2)(d) - "Where the ground water will be more than 100 feet below the bottom of the buried waste, the operator shall collect at a minimum, a five point, composite sample of the contents of the drying pad associated with a closed-loop system or the contents of a temporary pit after treatment or stabilization, if treatment or stabilization is required, to demonstrate that benzene, as determined by EPA SW-846 method 8021B or 8260B, does not exceed 0.2 mg/kg; total BTEX, as determined by EPA SW-846 method 8021B or 8260B, does not exceed 50 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, does not exceed 500 mg/kg; TPH, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 2500 mg/kg; and chlorides, as determined by EPA method 300.1, do not exceed 1000 mg/kg or background concentration, whichever is greater. The operator may collect the composite sample prior to treatment or stabilization to demonstrate that the contents do not exceed these concentrations. However, if the contents collected prior to treatment or stabilization exceed the specified concentrations the operator shall collect a second five point, composite sample of the contents after treatment or stabilization to demonstrate that the contents do not exceed these concentrations."

The company should mark this box and supply the required sampling language which follows the criteria of the above

4/1/2010