

R. T. HICKS CONSULTANTS, LTD.

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February 7, 2014

HOBBS OCD

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RECEIVED

Mr. Geoffrey Leking
NMOCD District 1
1625 French Drive
Hobbs, New Mexico 88240
Via Email

approved
Geoffrey Leking
Environmental Specialist
NMOCD - DIST 1
2/7/14

RE: Murchison – Mogi 9 State Com 2H, In-place Burial Notice
Unit O, Section 9, T24S, R33E, API #30-025-40976

Dear Mr. Leking:

On behalf of Murchison Oil and Gas, R. T. Hicks Consultants is providing this notice to NMOCD with a copy to the State Land Office (certified, return receipt request) that closure operations at the above- referenced pit will begin on **Wednesday, February 12, 2014**. The closure process should require about two weeks.

The "In-place Burial" closure plan for the above-referenced pit was approved on March 18, 2013 by the NMOCD, prior to the establishment of the June 2013 Pit Rule. Construction and operation of the temporary pit has been conducted to satisfy the rule under which it was approved as well as the June 2013 Rule. In conformance with the 2013 Pit Rule, a five-point composite sample that is fully representative of the solids in the pit was recovered on October 30, 2013 and stabilized with the available mixing soil at a 3:1 ratio¹. On January 13, 2014, we submitted a modified C-144 form and closure plan to NMOCD in anticipation of closure under the 2013 Pit Rule; NMOCD approved the closure plan the next day on January 14, 2014.

As shown in the summary table below, laboratory analyses of the stabilized cuttings composite demonstrate that the concentrations of the parameters listed in Table II of 19.15.17.13 NMAC (June 2013 Pit Rule) are below the limits that allow in-place burial of the stabilized cuttings.

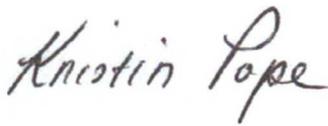
¹ (5) The operator shall collect, at a minimum, a five point composite of the contents of the temporary pit or drying pad/tank associated with a closed-loop system to demonstrate that, after the waste is solidified or stabilized with soil or other non-waste material at a ratio of no more than 3:1 soil or other non-waste material to waste, the concentration of any contaminant in the stabilized waste is not higher than the parameters in Table II of 19.15.17.13 NMAC.

3:1 Stabilized Cuttings Composite Sample		
Constituent	Table II Limit (GW>100 ft)	10/30/2013 Sample
Chloride	80,000 mg/kg	11,200
TPH	2,500 mg/kg	1,300
GRO+DRO	1,000 mg/kg	33.8
BTEX	50 mg/kg	3.86
Benzene	10 mg/kg	0.104

I will follow up this notice to you with a phone call today as required by the Pit Rule. As always, we appreciate your work to keep us on schedule.

Sincerely,

R.T. Hicks Consultants



Kristin Pope

Copy: Murchison Oil and Gas

Terry Warnell, State Land Office
New Mexico State Land Office
PO Box 1148
Santa Fe, NM 87504-1148
CERTIFIED MAIL – RETURN RECIEPT REQUEST