

**From:** Patterson, Heather, EMNRD  
**To:** ["Bob Allen"](#)  
**Cc:** [Rebecca Pons](#); [Brett Fulks](#); [Bratcher, Mike, EMNRD](#); [Shelly Tucker](#); [Bayliss, Randolph, EMNRD](#)  
**Subject:** RE: API 30-015-42426 Work Plan  
**Date:** Wednesday, June 08, 2016 7:14:00 AM

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Bob,

It is not for the OCD to determine SESI's or Devon's safety standards. The question is, once you apply your safety standards, what is left to excavate? Another question is, since these are high pressure water lines, can they be temporarily shut it? Therefore eliminating the pressure.

Regardless, we still need a vertical delineation at this location. Then we can determine whether this will be a deferment or not.

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

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**From:** Bob Allen [mailto:ballen@sesi-nm.com]  
**Sent:** Tuesday, June 07, 2016 1:56 PM  
**To:** Patterson, Heather, EMNRD  
**Cc:** Rebecca Pons; Brett Fulks; Bratcher, Mike, EMNRD; Shelly Tucker; Bayliss, Randolph, EMNRD  
**Subject:** Re: API 30-015-42426 Work Plan

How far from the high pressure line is acceptable to the NMOCD?

Bob Allen CSP, CHMM  
Office. 575-397-0510  
Cell 575-390-7063

On Jun 7, 2016, at 2:36 PM, Patterson, Heather, EMNRD <[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)> wrote:

**RE: Devon Energy \* Cotton Draw Unit #172H \* 30-015-42426 \* 2RP-3683**

Rebecca,

The OCD cannot approve a work plan before it is fully delineated. I also have a question about the 10' buffer Devon is requesting. Once this is applied, what, if anything, is left for excavation? According to my measurements, the entire spill area is within the 10' buffer.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

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**From:** Rebecca Pons [<mailto:office2@sesi-nm.com>]

**Sent:** Thursday, June 02, 2016 8:32 AM

**To:** Patterson, Heather, EMNRD; Tucker, Shelly

**Cc:** [ballen@sesi-nm.com](mailto:ballen@sesi-nm.com); Brett Fulks

**Subject:** API 30-015-42426 Work Plan

Good Morning,

I have attached the Delineation Report and Work Plan for the Devon Cotton Draw 172H. Please note: In the Right of Way on this location there are high pressure pipelines. We prefer to leave these areas undisturbed within 10' of all directions. Please review and let me know if you concur or should you have any questions or concerns.

*Thank You*

*Rebecca Pons*

Safety & Environmental Solutions, Inc.  
703 East Clinton Street  
Hobbs, NM 88240  
Office: (575) 397-0510