

**From:** Tucker, Shelly  
**To:** [Weaver, Crystal, EMNRD](#)  
**Cc:** [Sheldon Hitchcock](#); [Michael Barrett \(mbarrett@limerockresources.com\)](mailto:mbarrett@limerockresources.com); [David Adkins](#); [Bratcher, Mike, EMNRD](#)  
**Subject:** Re: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141  
**Date:** Wednesday, June 28, 2017 1:59:35 PM  
**Attachments:** [image002.png](#)  
[image001.png](#)

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## BLM concurs with NMOCD approval.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Wed, Jun 28, 2017 at 1:40 PM, Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)> wrote:

RE: Lime Rock \* Eagle 34 K Federal #21 \* 30-015-29112 \* 2RP-4221

Sheldon,

Thank you for the provided clarification on info regarding the sampling areas of S-6 thru S-10.

Your proposal for remediation of the above referenced release is approved with the following additions/conditions:

- According to your work plan you state that the area around S-6 thru S10 will be fully remediated upon closure of the facility. A deferment will need to be requested for that portion of the spill.
- I double checked RA-3917 in the OSE – NMWRRS database website to see if any mapping locational errors had occurred on their behalf when documenting the location of this well. I could not find any. You are welcome to look it up as a standalone search and reference all of the documentation they do have in their system for it. It appears to my knowledge to be properly documented (at 50ft to ground water) and mapped. Therefore, since it is the closest documented well to the release site, as I mentioned before, the site ranking for this release will thus have to change from a 0 to a 10, thus changing the TPH remediation expectant levels from 5,000ppm to 1,000ppm.
- S-5 area will require further excavation than your originally proposed 1.5ft. Please provide bottom hole lab confirmation of this effort.

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.

Please advise once remedial activities have been scheduled. If you have any further questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

Thank you,

## Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1<sup>st</sup> Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

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**From:** Sheldon Hitchcock [mailto:[slhitchcock@talonlpe.com](mailto:slhitchcock@talonlpe.com)]

**Sent:** Tuesday, June 27, 2017 9:10 AM

**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>

**Cc:** Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)) <[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Subject:** RE: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141

Crystal,

The answers to your questions are below. Please let me know if you have any other questions.

1. The areas surrounding sample locations S-6 through S-10 were hand excavated to a depth of 1-foot below ground surface (BGS). This was the “maximum depth practicable” meaning that any excavation beyond this depth could pose a risk to infrastructure and the personnel working around the infrastructure. As you can see on the site map there is a lot of equipment, tanks, flowlines, etc. In the vicinity of those sample locations.

2. The sample depths are all in relation to ground surface. In this case they (S-6 through S-10) were taken from the bottom of the excavation at a depth of 1-foot BGS.
3. I re-ran the groundwater data and I am still getting the same results. I also cross referenced the site with the groundwater trend map and it is near a 100-foot trend line. I don't understand why OSE isn't populating that well in my search if it is within my radius...is it a plugged well?

Respectfully,

**Sheldon Hitchcock**

**Project Manager**

Office: 575.746.8768

Direct: 575.616.4021

Cell: 575.689.5198

Fax: 575.746.8905

Emergency: 866.742.0742

Web: [www.talonlpe.com](http://www.talonlpe.com)



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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

**Sent:** Friday, June 23, 2017 4:46 PM

**To:** Sheldon Hitchcock <[slhitchcock@talonlpe.com](mailto:slhitchcock@talonlpe.com)>

**Cc:** Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)) <[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Subject:** RE: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141

Hello Sheldon,

We have been swamped as always so I finally got to look at your work plan thank you for resending it.

I have a few questions before we can move forward.

1. S-6 thru S-10 you say that you excavated to the depth that was practicable could you please explain what that means? As in what were those depths in relation to the locations of each of those mentioned S-6 thru S-10 spots?
2. Also your sample depths for all of the same points mentioned in question states that you sampled to 1 foot. Is that 1 foot from when you guys did the scrape or an additional 1 foot after the 1 foot scrape? Just trying to understand how far down you were able to go total in those locations.

Also I did my own ground water analysis and I am not sure how your analysis missed this well site cause it is well within the range of your search and your search appeared accurately executed to me, however, I found RA-3917 which has a depth to ground water documented at 50 ft. and is only 2550 meters away from the Eagle 34 Federal #21 location. Your well that you cited in your ground water data research that documents ground water depth at 140 ft. (RA-3661) is 3299 meters away from the Eagle 34 Federal #21 location. Therefore, based on this information a new site ranking number of 10 has been applied to this project. Please feel free to double check what I have and let me know if you find any issues with my findings.

Thank you and I look forward to hearing back from you regarding my questions.

Sincerely,

**Crystal Weaver**

Environmental Specialist

OCD – Artesia District II

811 S. 1<sup>st</sup> Street

Artesia, NM 88210

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**From:** Sheldon Hitchcock [<mailto:slhitchcock@talonlpe.com>]  
**Sent:** Friday, June 23, 2017 3:21 PM  
**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Cc:** Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)) <[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Subject:** RE: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141  
**Importance:** High

Crystal,

The work plan is attached. Please let me know if it still doesn't show up.

Respectfully,

**Sheldon Hitchcock**

**Project Manager**

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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]  
**Sent:** Friday, June 23, 2017 2:55 PM  
**To:** Sheldon Hitchcock <[slhitchcock@talonlpe.com](mailto:slhitchcock@talonlpe.com)>  
**Cc:** Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)) <[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Subject:** Re: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141

Sheldon,

Can you resend the attachment of the work plan. I don't have it or if you did attach it then it isn't showing up on my end...

Thank you,

Crystal Weaver

Environmental Specialist

OCD - Artesia District 2

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On Jun 16, 2017, at 8:30 AM, Sheldon Hitchcock <[slhitchcock@talonlpe.com](mailto:slhitchcock@talonlpe.com)> wrote:

Crystal,

Have you had a chance to look at the work plan for this site?

Respectfully,

**Sheldon Hitchcock**

**Project Manager**

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<image002.png>

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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]

**Sent:** Monday, June 12, 2017 3:11 PM

**To:** 'Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com))'

<[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); Sheldon Hitchcock

<[slhitchcock@talonlpe.com](mailto:slhitchcock@talonlpe.com)>

**Cc:** David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>; Bratcher, Mike, EMNRD

<[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Subject:** RE: Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112)  
Initial C-141

RE: Lime Rock \* Eagle 34 K Federal #21 Battery \* 30-015-29112 \* 2RP-4221

Mike,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval. The OCD tracking number for this event is 2RP-4221.

Thank you,



## Crystal Weaver

Environmental Specialist

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**From:** Sheldon Hitchcock [<mailto:slhitchcock@talonlpe.com>]

**Sent:** Tuesday, May 23, 2017 9:47 AM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; [stucker@blm.gov](mailto:stucker@blm.gov)

**Cc:** 'Michael Barrett ([mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com))'

<[mbarrett@limerockresources.com](mailto:mbarrett@limerockresources.com)>; David Adkins <[dadkins@talonlpe.com](mailto:dadkins@talonlpe.com)>

**Subject:** Lime Rock: Eagle 34 "K" Federal #021 Battery (30-015-29112) Initial C-141

All,

Please see the initial C-141 for the Eagle 34 K Fed #21 Battery release. Let me know if you have any questions or concerns.

Respectfully,

**Sheldon Hitchcock**

**Project Manager**

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<image004.png>