

From: [Weaver, Crystal, EMNRD](#)
To: ["Rebecca Haskell"](#); [Gonzales, Clair](#); [Bratcher, Mike, EMNRD](#); [Naranjo, Mark](#)
Cc: [Dakota Neel](#); [Sheldon Hitchcock](#); [Aaron Lieb](#); [Robert McNeill](#); [Tavarez, Ike](#)
Subject: RE: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)
Date: Tuesday, February 27, 2018 3:04:00 PM

RE: COG * G J West Coop Unit #210 * 30-015-36703 * 2RP-4487

Rebecca/Clair,

OCD has reviewed this work plan and has a few questions:

- For BH-1 where did the data come from for the sample analysis at 4-5ft, 6-7ft., and 9-10ft.? Cause in Xenco's lab data they list depths for boreholes that were not analyzed by their lab and all three of those depths are stated as "Not analyzed" and when I went thru the Xenco report I couldn't find any data for those depths followed up on later dates or anything else.
- Same for BH-2 at 4-5ft., 6-7ft., and 9-10ft. So where did the additional data that is in Table 1 come from for those depths of BH-1 and BH-2, that I just mentioned, that Xenco states were "Not analyzed"?
- OCD would like to see lab data that verifies depths at which delineation numbers are RRAL and COA compliant. So during confirmation sampling, since that is what is proposed to be done during the excavation process, OCD requests side wall and bottom holes will need to go an additional 2 inches in from where the excavation is dug to in order to get confirmation samples that are not at the surface of the exposed excavation.
- What is the "Analytical non conformances and comments" section regarding on page 4 of Xenco's report? Does it mean they ran the samples under protocol for EPA 8021B but had to prep the samples under protocol method 5030? Could that be explained please?
- Even though this was reported as an oil spill, verification of chloride concentrations via Method 300 lab data should be conducted. Especially since it is state that this location is being investigated due to a liner breach. For all side wall and bottom hole confirmation samples OCD would like to request that chlorides via Method 300 be tested for.
- Also one final question, in the written portion of the report it is stated that bore holes were chosen at the locations they were conducted at due to limitations on access. OCD would like to inquire as to whether or not the bore holes are within the area where the liner breaches were discovered or if there was limitations on conducting delineation at the breach areas please explain.

Upon receipt of answers to these questions OCD will review said answers and at that time provide an approval or denial of this work plan.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Rebecca Haskell [mailto:RHaskell@concho.com]

Sent: Thursday, February 22, 2018 4:00 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>

Cc: Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Aaron Lieb <ALieb@concho.com>; Robert McNeill <RMcNeill@concho.com>; Tavaréz, Ike <Ike.Tavaréz@tetrattech.com>

Subject: RE: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)

Mr. Bratcher / Ms. Weaver,

We have started remediation at this site because all of the equipment has been removed. We have excavated the area where the area of the new battery will go and have collected samples. The samples are going to the lab and will be rushed. We would like to backfill as soon as we get the results so the new battery can be constructed.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
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rhaskell@concho.com



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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, February 16, 2018 2:19 PM
To: Rebecca Haskell; Gonzales, Clair; Bratcher, Mike, EMNRD; Naranjo, Mark
Cc: Dakota Neel; Sheldon Hitchcock; Aaron Lieb; Robert McNeill; Tavarez, Ike
Subject: [External] RE: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)

Rebecca,

So sorry. I have been reading all day and I think my eyes mistook that paragraph in her email for one of those "if you are not the authorized recipient of this message blahh blahh..."

Again really sorry. Thanks for sending this originally and again. I see that your request is valid for us to consider it urgent and I will do my best to move it up to be looked at ASAP.

Thanks and again I apologize,

Crystal Weaver

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From: Rebecca Haskell [<mailto:RHaskell@concho.com>]
Sent: Friday, February 16, 2018 1:05 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Aaron Lieb <ALieb@concho.com>; Robert McNeill <RMcNeill@concho.com>; Tavarez, Ike <Ike.Tavarez@tetrattech.com>
Subject: RE: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)

Crystal,

There is a blub on why it is urgent below but here it is again:

COG is currently in the process of removing equipment from this battery to allow for remediation. The battery will be moved to another location on the same well pad, however part of the new battery will overlap the existing battery placement. The area of overlap will be on the southwest end of the current battery placement. Remediation activities on that end need to be completed as soon as possible to allow for construction of the new battery and for production to be turned back on.

I know you are very busy which is why the blurb was included in the original email. We did discuss this site with Mike, however, plans have changed since then. We discussed the possibilities of maybe getting a deferment for this spill. COG has decided to move the battery so that a full remediation can be completed on this particular release. However, things are already in motion and we need to be able to conduct the remediation as soon as the equipment is done being removed. We would really appreciate your assistance with this.

Thank You,

Becky Haskell
Senior HSE Coordinator
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From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Friday, February 16, 2018 1:58 PM
To: Gonzales, Clair; Bratcher, Mike, EMNRD; Naranjo, Mark
Cc: Rebecca Haskell; Dakota Neel; Sheldon Hitchcock; Aaron Lieb; Robert McNeill; Tavarez, Ike
Subject: [External] RE: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)

**** External email. Use caution. ****

Clair,

When you send something as urgent can you please write a blurb on why it is considered to be urgent by COG/Tetra Tech. Cause OCD is very behind right now and we have to gage what is urgent and not by our method of assessment in order to allow for the possible placement of it ahead of others. Mike is out of the office right now and I know there was a discussion with him on a number of sites and I think this one is one of them but I was not present for that conversation.

Thank you in advance,

Crystal Weaver

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From: Gonzales, Clair [<mailto:Clair.Gonzales@tetrattech.com>]
Sent: Friday, February 16, 2018 11:35 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Rebecca Haskell <RHaskell@concho.com>; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Aaron Lieb <ALieb@concho.com>; Robert McNeill <RMcNeill@concho.com>; Tavaréz, Ike <Ike.Tavarez@tetrattech.com>
Subject: URGENT: COG GJ West Coop Unit #210 Work Plan Approval Request (2RP-4487)
Importance: High

Good Afternoon,

Attached is the work plan for the above referenced site located in Eddy County, New Mexico. Once approved, COG will implement the proposed work plan.

COG is currently in the process of removing equipment from this battery to allow for remediation. The battery will be moved to another location on the same well pad, however part of the new battery will overlap the existing battery placement. The area of overlap will be on the southwest end of the current battery placement. Remediation activities on that end need to be completed as soon as possible to allow for construction of the new battery and for production to be turned back on.

Let me know if you have any questions or concerns.

Thank you,

Clair Gonzales

Clair Gonzales | Project Manager

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946

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