

## Venegas, Victoria, EMNRD

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**From:** Ike Tavaréz <itavarez@concho.com>  
**Sent:** Friday, April 5, 2019 9:53 AM  
**To:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; 'jamos@blm.gov'  
**Cc:** Rebecca Haskell; Sheldon Hitchcock; Dakota Neel; DeAnn Grant; Carmona, Mike; Kell, John; Jennifer Knowlton; Gonzales, Clair  
**Subject:** [EXT] RE: COG Screech Owl Fed #4H (2RP-4944) 8.18.18 Closure Request

Victoria,

We understand the regulatory requirements for the site. Majority of the release has been remediated below the proposed concentrations, with the exception a small area along the very active lease road with high traffic. However, we also assumed there would be some flexibility in the rule and the chloride concentrations detected on the edge of the lease road do not appear to an environmental concern.

As stated in the submitted report, the areas of North Sidewall #5 and North Sidewall #6 could not be safely excavated or removed due to the location along a high traffic lease road. Based on the safety concerns, COG proposes to defer the areas of North Sidewall #5 and North Sidewall #6. Please let me know if you have any questions or concerns.

Ike Tavaréz, PG  
Senior HSE Supervisor  
COG Operating LLC  
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**From:** Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]  
**Sent:** Thursday, April 04, 2019 3:03 PM  
**To:** Gonzales, Clair <Clair.Gonzales@tetrattech.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; 'jamos@blm.gov' <jamos@blm.gov>  
**Cc:** Rebecca Haskell <RHaskell@concho.com>; Ike Tavaréz <itavarez@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; DeAnn Grant <agrant@concho.com>; Carmona, Mike <Mike.Carmona@tetrattech.com>; Kell, John <John.Kell@tetrattech.com>; Jennifer Knowlton <jknowlton@concho.com>  
**Subject:** [External] RE: COG Screech Owl Fed #4H (2RP-4944) 8.18.18 Closure Request

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

RE: COG Screech Owl Fed #4H (2RP-4944) 8.18.18 Closure Request

Ms. Gonzales,

OCD has received your closure request for COG Screech Owl Fed #4H (**2RP-4944**) 8.18.18, thank you. Unfortunately, at this time, this closure request is not approved for the following reason:

- The release is located in a high karst area. OCD considers high karst area as "an unstable area". Please note that according to OCD rule, *if a release occurs within an unstable area, the responsible party must treat the release as if it occurs less than 50 feet to groundwater in Table I of 19.15.29.12 NMAC.*
- Analytical data for two sample points, North Sidewall# 5 and North Sidewall# 6, show chloride concentration values above the limit of 600 mg/kg. Based on these results, OCD considers that the contaminated soil at these two points is still in place and this closure cannot be approved.

Please let me know if you have any further questions.

Regards,

Victoria Venegas  
EMNRD  
OCD-District II  
811 S First St. Artesia  
NM 88210  
[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)

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 groundwater, 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, or local laws and/or regulations.

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**From:** Gonzales, Clair <[Clair.Gonzales@tetrattech.com](mailto:Clair.Gonzales@tetrattech.com)>

**Sent:** Wednesday, March 27, 2019 9:13 AM

**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; 'jamos@blm.gov' <[jamos@blm.gov](mailto:jamos@blm.gov)>

**Cc:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>; Carmona, Mike <[Mike.Carmona@tetrattech.com](mailto:Mike.Carmona@tetrattech.com)>; Kell, John <[John.Kell@tetrattech.com](mailto:John.Kell@tetrattech.com)>

**Subject:** [EXT] COG Screech Owl Fed #4H (2RP-4944) 8.18.18 Closure Request

Good Morning,

The closure report for the above referenced site located in Eddy County, New Mexico is attached. Please 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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