

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Tuesday, April 16, 2019 2:26 PM
To: 'Rebecca Pons'
Cc: 'Thomas Haigood'; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Mann, Ryan
Subject: Workplan Conditional Approval - Breitburn - State 647-711 - (2RP-4969) (9/8/18)
Attachments: Work Plan Conditional Approval - Breitburn - State 647-711 (2RP-4969) 4.16.19.pdf

Rebecca,

We have received your Workplan/Remediation Proposal for **2RP-4969 State 647-711**, thank you. This Workplan/Remediation proposal is conditionally approved with the following conditions:

1. All off pad areas to contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg. This may require additional sidewall samples and further delineation
2. Performing a grab sample plan of the remediation area, where each composite sample is not representative of more than 200 ft²
4. Laboratory analyses of final sampling and a description of all remedial activities taken
5. Provide a scaled site and sampling diagram, photographs of the remediation site prior to backfill
6. All other closure reporting need to follow requirements set forth in 19.15.29.12 NMAC
7. Restoration, reclamation and re-vegetation to 19.15.29.13 NMAC

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@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.

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Tuesday, April 16, 2019 10:06 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Subject: RE: [EXT] RE: Workplan changes need - Breitburn - State 647-711 (2RP-4969) (9/8/18)

Hi Robert,
I sincerely apologize! Here you go. Let me know if you need any additional info.

Best Regards,

Rebecca Pons



Environmental Coordinator
Safety and Environmental Solutions, Inc.
Office: (575)397-0510
Cell: (575)441-0980

From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]
Sent: Tuesday, April 16, 2019 7:47 AM
To: Rebecca Pons <office2@sesi-nm.com>
Subject: RE: [EXT] RE: Workplan changes need - Breitburn - State 647-711 (2RP-4969) (9/8/18)

Hey Rebecca,

I noticed there wasn't an attachment on this one?

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Monday, April 8, 2019 2:02 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Thomas Haigood <Thomas.Haigood@mavresources.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXT] RE: Workplan changes need - Breitburn - State 647-711 (2RP-4969) (9/8/18)

Robert,

Here is the revised work plan with the additional sampling that you requested. At your request; all samples were grabbed at surface and 1 ft increments. I proposed in the work plan, and due to lease road traffic that we be permitted to remove visual staining in the lease road grabbing a confirmation sample at that point. Please review and advise me accordingly.

Thank you

Best Regards,

Rebecca Pons



Environmental Coordinator
Safety and Environmental Solutions, Inc.
Office: (575)397-0510
Cell: (575)441-0980

From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]
Sent: Tuesday, March 12, 2019 9:31 AM
To: Rebecca Pons <office2@sesi-nm.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: Workplan changes need - Breitburn - State 647-711 (2RP-4969) (9/8/18)

Rebecca,

There are a couple of issues with the SA/RP on the State 647-711. There are not enough sample points on the Site Assessment. We'll need samples that include the road and the northern portion that is off the pad also. Additionally, the 2 sample points that you included start at 2 feet and the other at 3 feet. We don't have samples at the surface on either. I recommend sampling from the surface in 1 foot increments.

Also, we do not use the point system any longer, so you can omit that from your characterizations in the future.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@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.

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Thursday, March 7, 2019 1:13 PM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Subject: RE: [EXT] Outstanding Work Plans for Breitburn (2RP-4854, 7/2/18) and (2RP-4969, 9/8/18)

Hi Robert,

I have attached the revised C-141's signed by the company representative for your records. Please review and advise me if you can grant an approval on the respective work plans. Also, could you please let me know if I have a contact person here in the Lea County Division Office?

Thanks you for all of your help!

Best Regards,

Rebecca Pons



Environmental Coordinator
Safety and Environmental Solutions, Inc.
Office: (575)397-0510
Cell: (575)441-0980

From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]

Sent: Monday, March 04, 2019 4:03 PM

To: Rebecca Pons <office2@sesi-nm.com>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: RE: [EXT] Outstanding Work Plans for Breitburn (2RP-4854, 7/2/18) and (2RP-4969, 9/8/18)

Hi Rebecca,

If the Remediation Plan wasn't approved before 8/14/18 we will still need pages 3,4, and 5 of the new C-141. Sorry for the delay, we are slowly making progress.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@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.

From: Rebecca Pons <office2@sesi-nm.com>

Sent: Monday, March 4, 2019 3:51 PM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Subject: RE: [EXT] Outstanding Work Plans for Breitburn (2RP-4854, 7/2/18) and (2RP-4969, 9/8/18)

Robert,

I have attached copy of our correspondence regarding the C-141 that was filed with the NMOCD on 07/10/18 and the issuance of the RP number for 2RP-4854.

Since there has been a changing of the guard at the NMOCD it has been difficult to ascertain the approval or denial of Characterization/Remediation Plans. Since this incidents was pre August of 2018, are you still requiring the new C-141's? If so, I will draft this for signatures and submit ASAP. And, I actually sent them in separately originally, but received no response. I appreciate all of your help and effort with this.

I will send the revised C-141 for the 2RP-4969 tomorrow.

Best Regards,

Rebecca Pons



Environmental Coordinator
Safety and Environmental Solutions, Inc.
Office: (575)397-0510
Cell: (575)441-0980

From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]

Sent: Monday, March 04, 2019 3:33 PM

To: Rebecca Pons <office2@sesi-nm.com>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Subject: RE: [EXT] Outstanding Work Plans for Breitburn (2RP-4854, 7/2/18) and (2RP-4969, 9/8/18)

Rebecca,

Please fill out the attached portion of the Form C-141. These pages will need to be sent in with Characterization and/or Remediation proposals. Anytime we receive a Characterization and/or Remediation Plan, we will need pages 3,4, and 5 of the C-141 in with that plan. One of the releases was pre 8/14/18 and should be sent to Brad Billings, but since you sent them in together I will review them both.

Please let me know if you have any questions.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@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.

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Friday, February 22, 2019 1:11 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: [EXT] Outstanding Work Plans for Breitburn

Good Afternoon,
I submitted these work plans back in December, and have not had a response as to whether they were approved, or approved with conditions. Could you please review these for me and advise me. I believe these locations have sold, but Maverick wants to follow up regarding the remediation status. We will proceed upon your advisement.
Have a great weekend!

Best Regards,

Rebecca Pons



Environmental Coordinator
Safety and Environmental Solutions, Inc.
Office: (575)397-0510
Cell: (575)441-0980