

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, September 4, 2019 2:07 PM
To: 'Rebecca Pons'; Hamlet, Robert, EMNRD; jamos@blm.gov; 'dgimbel@ascentenergy.us'
Cc: Bob Allen; Bratcher, Mike, EMNRD; jrobins@ascentenergy.us; mward@ascentenergy.us
Subject: Closure Report- Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409) NOT APPROVED
Attachments: (C-141 Final) DENIED Emperor Federal Gas B 9.4.19.pdf

Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409)

Ms. Pons,

OCD has received your closure request and final C-141 for - Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409), thank you. This closure is NOT APPROVED for the following reason:

- There is contaminated soil still in place. DRO concentration at Sample point AH-15 @1ft is 28000 mg/Kg. This DRO concentration value does not meet the closure criteria for this site.

According to the Spill Rule, 19.15.29.13 *"The deferral may be granted so long as the contamination is fully delineated"*. Full delineation will be required at sample point AH-15 @1ft before to apply for a deferral. Lab data needs to be provide as evidence of delineation efforts.

Regards,

Victoria Venegas
EMNRD
OCD-District II
Artesia
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.

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Tuesday, September 3, 2019 2:05 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Bob Allen <ballen@sesi-nm.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: [EXT] RE: Work Plan Conditional Approval - Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409)

Ms. Venegas,

In response to your request for additional photographs of the remediation: I have requested the pictures from our field technician and attached them to this email. In response to your question regarding the soil analyses of sample point AH-15: I took a closer look at the GPS coordinates and this sample was extracted inside the cellar box exactly at the well head. And we were not able to excavate at this point for safety reasons and high pressure release possibilities (please see 1st photo). Also, please note that most of the fluid was contained in the cellar box, and that most of our impact was derived from overspray. SP 10 (32.546179, -103.979372) at bottom was located 4 feet from AH-15 (outside the cellar box). We did excavate this area just as close as possible to the cellar box. I requested the wellhead area inside

the cellar box be deferred to such a point in time that the well is decommissioned (plug and abandoned) and the pad area reclaimed in accordance with NMOCD and BLM guidelines at that time.

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Friday, August 30, 2019 3:47 PM

To: Rebecca Pons <office2@sesi-nm.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; jamos@blm.gov

Cc: ballen@sesi-nm.com; dgimbel@ascentenergy.us; jrobins@ascentenergy.us; mward@ascentenergy.us; Deborah McKinney <dmckinne@blm.gov>

Subject: RE: Work Plan Conditional Approval - Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409)

Closure Report Ascent Emperor Oil Co. Federal Gas B Com #001

Ms. Pons;

There are a couple of issues with the Closure Report on the Ascent Emperor Oil Co. Federal Gas B Com #001 2RP-5409:

- Regarding sample point SP-10 Bottom 1' (sample point AH-15 @1ft in the Remediation Plan): both samples points appear to be at the same position next to the pump jack. In the remediation plan, DRO concentration at sample point AH-15 @1ft was 28000 mg/kg at 1ft interval. In the closure report, EXT DRO concentration is 19.6 mg/kg. We do not understand how you go from 28000 mg/kg to 19.6 mg/kg in the same interval. Please provide an explanation.
- By rule, the final report must include:
 - (a) a scaled site and sampling diagram;
 - (b) **photographs of the remediated site prior to backfill;**
 - (c) laboratory analyses of final sampling; and
 - (d) a description of all remedial activities.

Please provide pictures of the excavation prior to backfill.

Regards,

Victoria Venegas

EMNRD

OCD-District II

Artesia

Victoria.Venegas@state.nm.us

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From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Wednesday, June 5, 2019 10:45 AM
To: Rebecca Pons <office2@sesi-nm.com>
Cc: jrobins@ascentenergy.us; mward@ascentenergy.us; jamos@blm.gov; Deborah McKinney <dmckinne@blm.gov>; ballen@sesi-nm.com; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Subject: Work Plan Conditional Approval - Ascent - Emperor Oil Co. Fed Gas B Com #1 - (2RP-5409)

Rebecca,

We have received your Workplan/Remediation Proposal for **2RP-5409 Emperor Oil Co Fed Gas B Com #1**, thank you. This Workplan/Remediation proposal is approved under the following conditions:

Please excavate and remove soil in the pasture at sample points AH-5, AH-6, AH-7 until DRO+GRO are <100 mg/kg. Additionally, excavate and remove soil on pad at sample points AH-12, AH-13, AH-14, AH-15 until DRO+GRO are <1000 mg/kg. Please let us know if you have any issues excavating around equipment.

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, May 14, 2019 7:30 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Crystal Weaver <caweaver@blm.gov>; jrobins@ascentenergy.us; mward@ascentenergy.us; jamos@blm.gov; Deborah McKinney <dmckinne@blm.gov>; ballen@sesi-nm.com
Subject: [EXT] Remediation-Work Plan Ascent Emperor Oil Co. Federal Gas B Com #001

Thank you for all of the help. I have attached the Remediation-Work Plan for the referenced location. Upon your review please provide me with your concurrence or conditions for approval.

Best Regards,

Rebecca Pons



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

From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]
Sent: Monday, May 13, 2019 4:02 PM
To: Rebecca Pons <office2@sesi-nm.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Crystal Weaver <caweaver@blm.gov>; jrobins@ascentenergy.us; mward@ascentenergy.us; jamos@blm.gov; Deborah McKinney <dmckinne@blm.gov>
Subject: RE: [EXT] revised-signed Ascent C-141

RE: [EXT] revised-signed Ascent C-141 Emperor Oil Co. Federal Gas B Com#001. DOR 03/12/2019

All,
The OCD tracking number for this release event is **2RP-5409**.
Thank you,

Victoria Venegas
EMNRD
OCD-District II
811 S First St. Artesia
NM 88210
Victoria.Venegas@state.nm.us

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From: Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Sent: Monday, May 13, 2019 3:23 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Subject: RE: [EXT] revised-signed Ascent C-141

Amalia Bustamante

EMNRD-Oil Conservation Division-District II
575-748-1283 EXT. 113

From: Rebecca Pons <office2@sesi-nm.com>
Sent: Monday, April 29, 2019 1:17 PM
To: Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Subject: RE: [EXT] revised-signed Ascent C-141

Hi Amalia,
My apologies for the delay, as I have been awaiting signature from the representative with Ascent Energy, and it has been a Monday for sure :/
Thank you

Best Regards,

Rebecca Pons



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

From: Bustamante, Amalia, EMNRD [mailto:Amalia.Bustamante@state.nm.us]
Sent: Friday, April 26, 2019 3:28 PM
To: Rebecca Pons <office2@sesi-nm.com>
Subject: RE: [EXT] revised-signed Ascent C-141

Thanks Rebecca,

We shall wait for your C-141 re-submittal. 😊

Amalia Bustamante

EMNRD-Oil Conservation Division-District II
575-748-1283 EXT. 113

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

Sent: Friday, April 26, 2019 1:35 PM

To: Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>

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

Subject: [EXT] revised-signed Ascent C-141

Hi Amalia and team,

I apologize for my impatience; as I am dealing with an impatient customer, who is receiving pressure from not only the State but the BLM as well. We have took proactive measures by Micro Blazing the pasture area, however Jim Amos with the BLM has contacted me regarding the remediation plan. I really appreciate all of your assistance with this. Have a great weekend.

Best Regards,

Rebecca Pons



Environmental Coordinator
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