

Venegas, Victoria, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, October 11, 2019 10:02 AM
To: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD
Subject: FW: Contact/Touch Base - FW: 1RP-3941 - VGWU Sat No. 4 - Site Assessment Report and Amended Proposed Remediation Workplan ++ 1RP-5610

From: Joel Lowry <joel@etechenv.com>
Sent: Friday, October 11, 2019 10:00 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Subject: [EXT] RE: Contact/Touch Base - FW: 1RP-3941 - VGWU Sat No. 4 - Site Assessment Report and Amended Proposed Remediation Workplan ++ 1RP-5610

Mr. Hamlet,

I have received your email. I appreciate you looking into this for me. I will try to contact Mr. Billings.

As for the Serrano 1RP-5610, again, I believe Ralph submitted the Workplan and C-141 in two separate submissions, so I can see how there may have been some confusion. He has assured me that he resubmitted it appropriately. With this, we are beginning to append the Characterization Report/Workplan/Closure to the applicable pages from the C-141 to prevent this from happening again. I can think of another instance where it seems we uploaded the C-141 and the Workplan as two documents during a single upload; we will refrain from doing this as well. I apologize for any inconvenience.

My intent of using a format similar to the C-141 to convey Release Details and Site Characteristics within the *Workplans* and *Closure Reports* is only an attempt to streamline reports and assist in the review process. You are correct. Amelia had asked that I use the PDF version of the Form C-141 as opposed to an excel version. It seemingly created some issues using the Form Fillable function to insert the Incident ID, District RP, Facility ID and Application ID on the C-141s; I made the correction immediately.

Again, I apologize for any inconveniences and appreciate your willingness to work with me on this stuff. I care tremendously about this industry and I know that the NMOCD is the most integral part. With this, I will continue to do everything in my power to assist you and clearly provide you with all the relevant information to make informed decisions. There have been a lot of changes over the last 10 years and there has been a lot of stress placed on those of us who have chosen this as a career. I have always tried to be one that adjusts and works with industry, my peers and regulators to strengthen the industry as a whole. If there is anything I can do to help or additional adjustments I need to make, please let me know. Thanks again Mr. Hamlet.

Respectfully,

Joel Lowry

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Friday, October 11, 2019 8:52 AM
To: Joel Lowry <joel@etechenv.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Subject: RE: Contact/Touch Base - FW: 1RP-3941 - VGWU Sat No. 4 - Site Assessment Report and Amended Proposed Remediation Workplan ++ 1RP-5610

Joel,

Any release that occurred before 8/14/2018 will need to be handled by Brad Billings up in the Santa Fe office. E-mail him and let him know that you have submitted it to the payment portal, so he knows it's there.

As far as the Goodnight Serrano 1RP-5610, the OCD had to deny that report because there were no actual C-141 signed and dated forms included in the report. If it's a work plan/remediation plan, we need to have C-141 (Pages 3-5) signed/dated included in the report. A closure report needs to have C-141 (Page 6) signed/dated in the report. The new payment portal gives us two options after we review the report, "Approve" or "Deny". There is no gray area. If a report is submitted to the OCD, it needs to meet all of the requirements of the spill rule and have all of the signed/dated C-141 forms included for us to be able to approve it. I'm not sure what the purpose is of manipulating or redacting parts of the form and including them in the report. I know Amalia discussed this with you a few months back and that you were aware of it then.

We are having some major staffing issues at the moment. Please make sure everything is included in a single report, where we can sit down, review it, and make a decision on the work that has been completed.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Robert.Hamlet@state.nm.us

From: Joel Lowry <joel@etechenv.com>

Sent: Thursday, October 10, 2019 9:11 AM

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

Subject: [EXT] Contact/Touch Base - FW: 1RP-3941 - VGWU Sat No. 4 - Site Assessment Report and Amended Proposed Remediation Workplan ++ 1RP-5610

Mr. Hamlet,

I wanted to see if you might be available for a phone call today or sometime soon. I understand Dylan my have routed a Historical Project to you that I have been working on for Chevron. Below is some of the correspondence for the Site. I had imagined that the document would be handled by Mr. Billings, so I wanted to reach out to you to see if I need to make some steps to reroute it. It is kind of a weird project/situation and it can't afford any more confusion or missteps. I hate to burden you guys with any additional work and I apologize for any inconvenience.

Also, I wanted to give you an update on the Goodnight Serrano 1RP-5610. I had received a Denial Email from you on 9/27/2019. After a little investigating it appears to that Goodnight Submitted the Workplan and C-141 in two separate submissions; furthermore Ralph indicated that he forgot to sign one of the Pages from the C-141. I wanted to let you know the "Site Assessment Report and Proposed Remediation Workplan" is a stand alone document, intended to

supplement the C-141, not replace it. I apologize for any inconvenience. Ralph assured me that he has resubmitted the Workplan and C-141 w/signatures as necessary. Thanks Robert.

Respectfully,

Joel Lowry

From: Joel Lowry

Sent: Wednesday, October 2, 2019 12:10 PM

To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: 1RP-3941 - VGWU Sat No. 4 - Site Assessment Report and Amended Proposed Remediation Workplan

Dylan,

Please find attached the *Site Assessment Report and Amended Proposed Remediation Workplan* that has been prepared for the VGWU Sat No. 4. The previously approved Soil Assessment Report and 2018 Remediation Workplan is included as Appendix E; the 2018 Remediation Workplan is located toward the end of the document. It should be noted that the most recent sampling data, collected this month, consists of soil samples collected from fifteen (15) test trenches, initially advanced to better characterized the uppermost 4 Ft. of soil and collect the requisite BTEX and TPH data. This data, along with all of the historical data, is depicted on Figure 3.

If you have any questions or need any additional information, please feel free to contact me by phone or email. Since the *Soil Assessment Report and 2018 Remediation Workplan* was submitted in October of 2018, I suspected that pages 3-5 of the new form C-141 would have already been submitted; I haven't been able to located one on the imagining. At your direction, I would be glad to submit the document through the portal along with the applicable pages from the Form C-141, if necessary. Alternatively, if I need to upload it into an ACO dropbox, I would be glad to do so. Thanks.

Respectfully,

Joel W. Lowry

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