

Venegas, Victoria, EMNRD

From: David Cain <david.cain@longfellowenergy.com>
Sent: Wednesday, November 6, 2019 12:55 PM
To: Hamlet, Robert, EMNRD
Cc: Monte Bell; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD
Subject: [EXT] RE: Deferral Denied - Longfellow Energy - State 20B Battery (2RP-5158) - 11.5.18
Attachments: Sate 20B Soil Analytical Results Summary Table.pdf; Rpt_WO_640850_ver_1_001.pdf

Hello,

Attached is our original submission, the rejection notification, and the analytical results table of our deeper sampling for vertical delineation of the release 2RP-5158.

Based on the data provided within these reports, we respectfully request deferral status be granted for this release until the site is no longer active.

Please let me know if you need any additional information.

Thank you,

David Cain

Engineering Technologist & Regulatory Specialist

O. 214.265.4715 | Ext. 1715
16803 Dallas Pkwy | Addison, TX 75001



From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Friday, June 21, 2019 12:30 PM
To: Cianna Logie <Cianna@sportenvironmental.com>
Cc: Debi Moore <Debi@sportenvironmental.com>; Monte Bell <Monte.Bell@riatacg.com>; David Cain <david.cain@longfellowenergy.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: [EXTERNAL] Deferral Denied - Longfellow Energy - State 20B Battery (2RP-5158) - 11.5.18

Cianna,

We have received your Remediation Deferral Request for **2RP-5158 State 20B Battery**, thank you. This Deferral request is denied.

The two bottom samples "SB4-001 @ 3.5'bgs" and "SB5-001 @ 1.5'bgs" in the affected berm are above the required limit for DROs and Chlorides. Please use a power auger or drill to sample deeper. The samples must be under the limit to verify the spill has been vertically delineated before we can approve a deferral.

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: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Sent: Thursday, June 20, 2019 12:55 PM
To: Cianna Logie <Cianna@sportenvironmental.com>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Debi Moore <Debi@sportenvironmental.com>; Monte Bell <Monte.Bell@riatacg.com>; David Cain <david.cain@longfellowenergy.com>
Subject: RE: Longfellow Energy - State 20B Battery (2RP-5158) - Deferral Request Report

Cianna,

I have included the District 2 Environmental Team in this response and have forwarded your submittal. Going forward please send all OCD District 2 environmental correspondence to the following:

Rob Hamlet: robert.hamlet@state.nm.us
Victoria Venegas: victoria.venegas@state.nm.us

Please continue to copy me as well.

Thank you,

From: Cianna Logie <Cianna@sportenvironmental.com>
Sent: Thursday, June 20, 2019 10:02 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Debi Moore <Debi@sportenvironmental.com>; Monte Bell <Monte.Bell@riatacg.com>; David Cain <david.cain@longfellowenergy.com>
Subject: [EXT] Longfellow Energy - State 20B Battery (2RP-5158) - Deferral Request Report

Hello Mr. Bratcher,

Attached please find the Site Characterization Report and Remediation Deferral Request Report for Longfellow Energy's State 20B Battery facility which experienced a release of produced water and a slight oil skim on November 5, 2018 as a

result of a lightning strike – this release was assigned the 2RP-5158 identifier upon being reported to NMOCD. Confirmation soil sampling at the subject site has shown that Longfellow's secondary containment (earthen berm) successfully limited impacts to the area inside of the berm and that the horizontal extent of the release was limited to within the berm area. The scope of vertical delineation sampling within the active well pad was limited due to safety concerns. However, the client's prompt discovery of the release and rapid recovery efforts (including the collection and proper disposal of released fluids) limited impacts to the site as shown in the photographic log and sample data summary included in the attached report. Having reviewed the available data, the site does not appear likely to cause an imminent risk to human health, the environment, or groundwater.

Based on the data provided within this report, Sport Environmental, on behalf of Longfellow Energy, respectfully requests deferral status be granted for this release until the site is no longer active.

If NMOCD would like to discuss any details of this request further, please contact us at (432) 683-1100.

Thank you,

Cianna Logie



CIANNA J. LOGIE, M.S.
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