

Venegas, Victoria, EMNRD

From: Thomas Haigood <Thomas.Haigood@mavresources.com>
Sent: Wednesday, February 12, 2020 1:09 PM
To: Venegas, Victoria, EMNRD
Cc: Hamlet, Robert, EMNRD; Thomas Franklin; Eads, Cristina, EMNRD
Subject: RE: [EXT] FW: Jalmat Sands Unit Water Injection

Victoria,

We have begun to further sample the Jalmat Sands Unit Water Injection Station and will modify our job scope with the remediation, which you have requested per Mr. Blevins identification of the water wells proximity to the facility. Due to missing crucial points within our work plans, I have released Mr. Allen and SESI from continuing with the remediation's in the Jalmat Area. Thomas Franklin with American Safety Services Inc., who I have included in this email will be heading the projects through closure. I apologize for not identifying the well proximity when I reviewed the initial work plan but I want to complete this site along with the Jalmat 225 as soon as feasible. We will also be submitted the work plan for the Jalmat 235 in the next week.

Additionally, We have attempted to communicate with NMOCD on certain issues we are having with the Jalmat 225. The work plan was approved by Dylan Rose – Coss and we followed the plan as indicated. Once remediation was complete, the closure was denied. Mr. Franklin can touch on this more as to why, but we remediated the spill site as the approved plan was stated.

Also, we are attempting to obtain a deferment on the Humble Yates Battery, which is the last project SESI (Bob Allen) will be completing for us. I would like specific guidance on what needs to be done to obtain this approval. I understand, NMOCD is shorthanded and as I've been told it is not the OCD responsibility to tell me how to do it but we are in need some feedback on the outstanding spills. I really appreciate the help you can give us, to finalize these outstanding spills so we can move on to taking a proactive approach to prevent any further from happening. Please include Mr. Franklin on any correspondence other than the Humble Yates, as he will be representing myself and MNR/Breitburn operating, with any environmental issues. I look forward to your response.

Thomas Haigood

From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Sent: Wednesday, February 12, 2020 11:35 AM
To: Rebecca Pons <office2@sesi-nm.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Thomas Haigood <Thomas.Haigood@mavresources.com>
Cc: Bob Allen <ballen@sesi-nm.com>; Sergio Contreras <scontreras@sesi-nm.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Subject: [EXTERNAL]: RE: [EXT] FW: Jalmat Sands Unit Water Injection

Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857

Ms. Purvis,

OCD has received new relevant information regarding the **Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857** site. A representative of the landowner had let us know that there is an active water well and cattle watering,

approximately 875 feet from the release site. This new circumstance changes the closure criteria for this site to the most stringent cleanup level in Table 1.

By Rule 19.15.29.12C.4 (c) (ii): *If a release occurs within the following areas, the responsible party must treat the release as if it occurred less than 50 feet to groundwater in Table I of 19.15.29.12 NMAC (ii) 1000 feet of any fresh water well or spring*". At this time, and base on the new information, the OCD requests the responsible party to remediate this site using DGW <50 ' as the closure criteria. OCD appreciates your understanding in this regards.

Thank you,

Victoria Venegas
EMNRD
OCD-District II
Artesia NM
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: Venegas, Victoria, EMNRD
Sent: Friday, December 20, 2019 2:28 PM
To: 'Rebecca Pons' <office2@sesi-nm.com>
Cc: Bob Allen <ballen@sesi-nm.com>; Sergio Contreras <scontreras@sesi-nm.com>
Subject: RE: [EXT] FW: Jalmat Sands Unit Water Injection

Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857

Ms. Purvis,

You are right, @1 foot, all samples are below the remediation levels for this site. I apologize for any confusion this may have caused. OCD approves this remediation plan as written. I'll get this corrected in the OCD database. Please, find attached the corrected C-141.

Regards,

Victoria Venegas
EMNRD
OCD-District II
Artesia NM
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: Friday, December 20, 2019 1:42 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Bob Allen <ballen@sesi-nm.com>; Sergio Contreras <scontreras@sesi-nm.com>
Subject: [EXT] FW: Jalmat Sands Unit Water Injection

Good afternoon Ms. Venegas. This is Kathy Purvis and I am replacing Rebecca Pons here at Safety & Environmental Solutions. On behalf of Bob Allen, I would like to thank you for your response to our Remediation plan. I have attached the remediation plan for your convenience and further review. As noted in the plan, SESI did reach acceptable levels for all constituents at one foot which coincides with our proposed 1 foot excavation depth. Your response indicates full delineation was not completed. We would like to comply with your request, but would appreciate additional guidance on how to proceed. Are you requiring us to establish a deeper delineation pattern that exceeds one foot, and if so, how deep would you like us to go? We appreciate any guidance you can provide.

Kathy Purvis
SESI

From: Bob Allen <ballen@sesi-nm.com>
Sent: Friday, December 20, 2019 10:59 AM
To: Office 2 <office2@sesi-nm.com>
Subject: Fwd: Jalmat Sands Unit Water Injection

Bob Allen CSP, CHMM
Office. 575-397-0510
Cell 575-390-7063

Begin forwarded message:

From: "Venegas, Victoria, EMNRD" <Victoria.Venegas@state.nm.us>
Date: December 20, 2019 at 10:30:59 AM MST
To: Thomas Haigood <Thomas.Haigood@mavresources.com>, Bob Allen <ballen@sesi-nm.com>, "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>
Cc: "Hamlet, Robert, EMNRD" <Robert.Hamlet@state.nm.us>, "Eads, Cristina, EMNRD" <Cristina.Eads@state.nm.us>
Subject: Jalmat Sands Unit Water Injection

Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857

Mr. Haigood,
OCD has received your Remediation Plan for Jalmat Sands Unit Water Injection 1RP-5771 NRM1930258857, thank you. This Remediation Plan is denied for the following:

- This release has not been fully delineated. By Rule 19.15.29.11.A(5)(b): "If the release occurred outside of a lined containment area, the responsible party must delineate the release horizontally and vertically using Table I of [19.15.29.12](#) NMAC constituents or as required by Subparagraph (e) of Paragraph (5) of Subsection A of [19.15.29.11](#) NMAC based on the type of release." On page 3, Table Soil Sample Results, the TPH concentration is above the limit for almost all samples. The closure criteria for this site is DWG < 100' i.e. TPH 2500 mg/kg, GRO+DRO 1000 mg/kg. OCD requests this site be fully delineated. Laboratory data should be provided as evidence of delineations efforts.

Regards,

Victoria Venegas
EMNRD
OCD-District II

Artesia NM

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.