

**Llull, Christian**

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**From:** Llull, Christian  
**Sent:** Thursday, March 12, 2020 3:34 PM  
**To:** Hamlet, Robert, EMNRD  
**Cc:** Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD  
**Subject:** RE: Alternative Confirmation Sample Plan - ConocoPhillips - Baish "A" Battery - (1RP-5641)  
**Attachments:** Revised Remediation Plan Page.pdf; Figure 5 Proposed Confirmation Samples\_Baish.pdf

Good afternoon, our remediation work has begun at the below mentioned site. However, we have not received review on the alternative confirmation sample plan.

Would you like this to be submitted through the fee portal?  
I am also including the executed remediation page as requested.

Christian

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**From:** Llull, Christian  
**Sent:** Wednesday, March 04, 2020 2:04 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>  
**Subject:** Alternative Confirmation Sample Plan - ConocoPhillips - Baish "A" Battery - (1RP-5641)

Rob:

In accordance with 19.15.29.12(D)(1)(b) NMAC, and on behalf of ConocoPhillips, Tetra Tech submits this alternative confirmation sample plan for the division's review and approval.

The attached figure provides proposed discrete sidewall and confirmation sampling locations of the remediated area where each discrete sample (sidewall and floor) is representative of approximately 500 square feet of excavated area. The confirmation samples will be analyzed for the constituents listed in Table I of [19.15.29.12](#) NMAC.

Per below, this Workplan/Remediation proposal is conditionally approved for **1RP-5641 Baish A Battery**. In previous correspondence you had requested that we include this figure in our remediation plan, however, this Work Plan was submitted prior to that correspondence.

We are also including the signed/dated Remediation page per your request.

We plan to begin excavation at the release area on March 11, 2020.

Please let me know if you have any further questions.

Christian

**Christian Llull, P.G.** | Project Manager  
Direct +1 (512) 338-2861 | Business +1 (512) 338-1667 | Fax +1 (512) 338-1331 | [christian.llull@tetrattech.com](mailto:christian.llull@tetrattech.com)

**Tetra Tech** | *Leading with Science*® | OGA  
8911 N. Capital of Texas Highway | Bldg. 2, Suite 2310 | Austin, TX 78759 | [tetrattech.com](http://tetrattech.com)

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**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>  
**Sent:** Friday, January 10, 2020 4:14:56 PM  
**To:** Llull, Christian <[Christian.Llull@tetrattech.com](mailto:Christian.Llull@tetrattech.com)>  
**Subject:** New Mexico OCD Application Submission was Approved by the OCD

**⚠ CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments. **⚠**

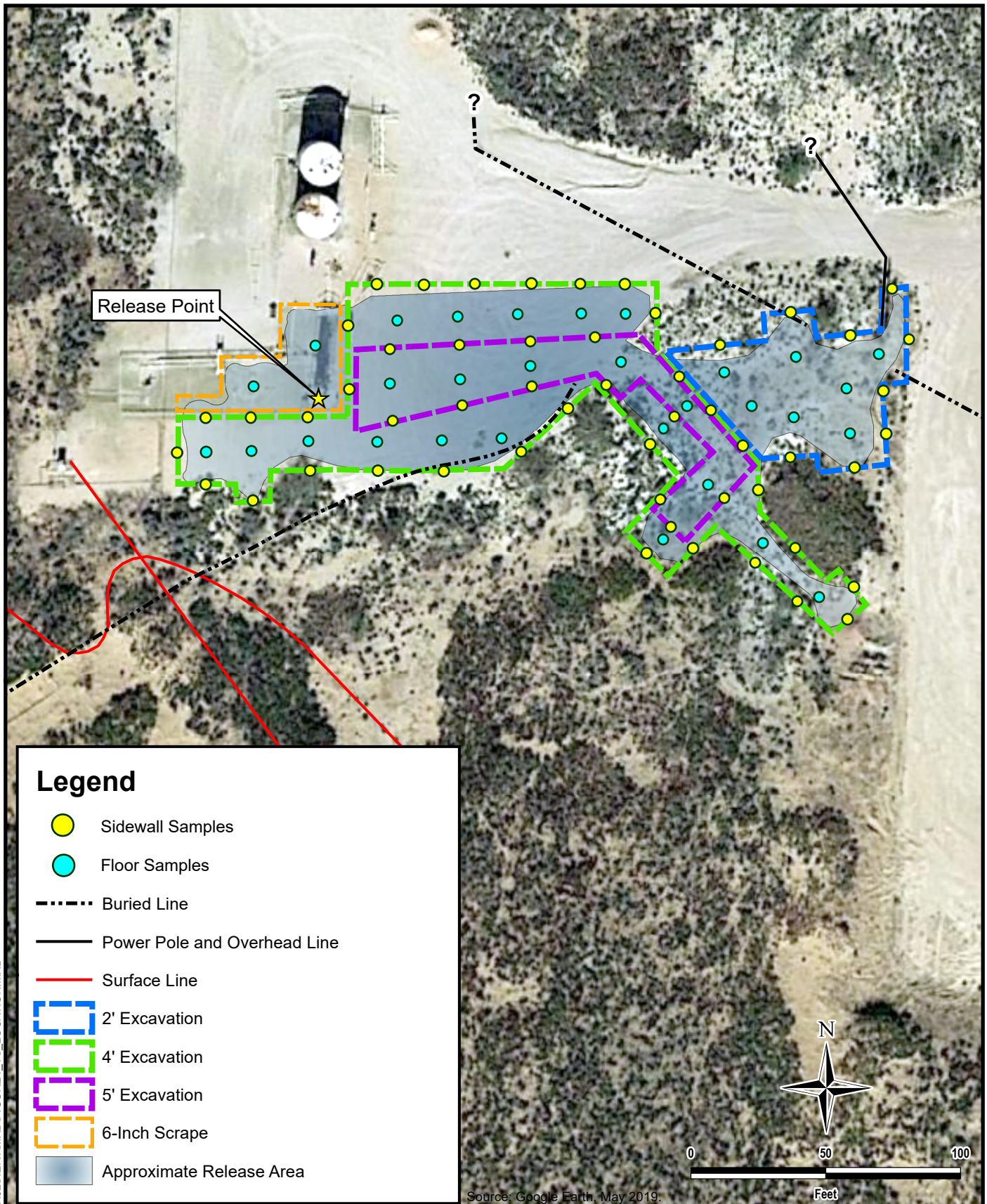
The Oil Conservation Division (OCD) has approved the application PO: 5AMTX-191115-C-1410.  
The original application was submitted by Christian Llull for CONOCOPHILLIPS COMPANY.

The user added the additional comment:

"Christian, We have received your Workplan/Remediation Proposal for 1RP-5641 Baish A Battery, thank you. This Workplan/Remediation proposal is conditionally approved. • All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg and TPH less than 100 mg/kg. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule <http://164.64.110.134/parts/title19/19.015.0029.html> • Please ensure soil sample point SP-4 is excavated until Chlorides are below 10,000 mg/kg and TPH (GRO + DRO) is below 1,000 mg/kg • Please also excavate SP-7 to 4' below ground surface to meet the chloride limit of 600 mg/kg and 100 mg/kg for TPH in the pasture area. The OCD Payment Portal is inadvertently scrubbing print from some Adobe PDFs that have been submitted. The OCD is aware of the problem and trying to fix the issue. Please, sign/date the attached Remediation page and sent it back to my e-mail address. We will archive the document in the well file. Sorry, for the inconvenience. Please let me know if you have any further questions. Thank you, "

If you are concerned about receiving this email or have any other questions,  
please feel free to contact our Santa Fe OCD office.

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



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**TETRA TECH**
[www.tetrattech.com](http://www.tetrattech.com)

 901 West Wall Street, Suite 100  
 Midland, Texas 79701  
 Phone: (432) 682-4559  
 Fax: (432) 682-3946

**CONOCOPHILLIPS**

 (32.822982°, -103.764177°)  
 LEA COUNTY, NEW MEXICO

**BAISH "A" BATTERY  
PROPOSED CONFIRMATION SAMPLING PLAN**

PROJECT NO.: 212C-MD-01878

DATE: NOVEMBER 11, 2019

DESIGNED BY: AAM

Figure No.

**5**



Form C-141

State of New Mexico  
Oil Conservation Division

Page 5

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** Each of the following items must be included in the plan.

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)


**Deferral Requests Only:** Each of the following items must be confirmed as part of any request for deferral of remediation.

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Jenni Fortunato

Title: Program Manager, Risk Management &amp; Remediation

Signature: 

Date: 11.14.19

email: Jenni.Fortunato@cop.com

Telephone: 832-486-2477

**OCD Only**

Received by: Robert Hamlet

Date: 1/10/2020

☒ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral ApprovedSignature: 

Date: 1/10/2020