

From: [Hamlet, Robert, EMNRD](#)
To: [Charles Lock](#)
Cc: [Bratcher, Mike, EMNRD](#); [Eads, Cristina, EMNRD](#); [Shar Harvester](#); [Aaron Daniels](#); [Hensley, Chad, EMNRD](#)
Subject: RE: Incident number NRM2019629912 - 90 Day Extension Request.
Date: Friday, May 14, 2021 3:52:00 PM

RE: Incident #**NRM2019629912**

Charles,

Your request for an extension to **August 14th, 2021** is approved. This will be the **final extension** for this release.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Charles Lock <CharlesL@kfoc.net>
Sent: Friday, May 14, 2021 2:53 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <aarond@kfoc.net>
Subject: [EXT] Incident number NRM2019629912 - 90 Day Extension Request.

Thank you for replying and providing some guidance. Based on your response we are requesting a 90 day extension to be able to conduct this delineation.

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337

From: Hamlet, Robert, EMNRD [<mailto:Robert.Hamlet@state.nm.us>]
Sent: Friday, May 14, 2021 3:14 PM
To: Charles Lock <CharlesL@kfoc.net>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels

<aarond@kfoc.net>

Subject: [EXTERNAL] RE: (Extension Approval) NRM2010460118 - 90 Day Extension Request ACTUAL number is NRM2019629912

Charles,

I didn't review the original report, but you might want to consult New Mexico 811 to come out and do some locates for you. The liner will need to be pulled and sampling should be safely conducted underneath the liner. With 174 unrecovered barrels of oil on the C-141, sampling will definitely need to be conducted. Safety should be paramount sampling around equipment and pipeline, just use your best judgement. The OCD needs the spill vertically delineated, which would require sampling deep enough in the release area to meet the necessary closure criteria standards. If there are sampling locations that you can't sample and equipment/pipelines are making it impossible, you can ask for a deferral at those sampling locations. Before we can approve a deferral the spill must be fully delineated. If the deepest sample is still over the limit, the spill hasn't been vertically delineated. Please take multiple samples in the Battery, as we will not defer the entire battery as a whole. Please remove as much of the contaminated soil with shovels and a hydrovac. If you believe a certain area will require a deferral, please make sure that it has been fully delineated with a sample at that location or as close to that location as possible.

Robert Hamlet • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

811 S. First Street | Artesia, NM 88210

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From: Charles Lock <CharlesL@kfoc.net>

Sent: Wednesday, May 12, 2021 4:30 PM

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

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <aarond@kfoc.net>

Subject: [EXT] RE: (Extension Approval) NRM2010460118 - 90 Day Extension Request ACTUAL number is NRM 2019629912

Some of what we want to talk about is the difficulty to sample through the liner inside the secondary containment. There are numerous pipelines running inside the facility between the tanks that are above ground. It is not possible to get anything other than a hand auger inside the battery. If we were to attempt to hand auger at this location we are not positive that we can get much deeper

than 3 to 4 feet based on what it took to build the facility. Our other option was to use a road bore machine to bore at an angle to get under the facility. However, they would probably need to use a drilling fluid to drill through the rock which leaves us with trying to sample cuttings if we were to gain any samples.

This is the biggest reason we went back and drilled deeper vertical holes around the outside of the containment to try and conduct vertical delineation that way. We would like to discuss these options with someone from NMOCD and can't seem to make that happen so we requested an extension so we have more time to either set up a phone call or set up a meeting in your Artesia office to discuss this situation. Please let me know if either of these options for discussion are available.

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337

From: Charles Lock
Sent: Wednesday, May 12, 2021 3:55 PM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <AaronD@kfoc.net>
Subject: RE: (Extension Approval) NRM2010460118 - 90 Day Extension Request ACTUAL number is NRM 2019629912

Robert you are correct I have sent my last three emails with the wrong incident number. It is the SBLU 263H facility but the correct incident number is NRM2019629912. Attached is the email we received from NMOCD denying our deferral request. This is the facility and incident number I meant to request a 90 day extension on. Before we proceed with any additional delineation of the site I needed to discuss the options we came up with for accomplishing that with someone at NMOCD. I am sorry for the confusion on the sites. Would you be available to discuss this site today please. I am currently in New Mexico so I will have to call you from our New Mexico office.

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337

From: Hamlet, Robert, EMNRD [<mailto:Robert.Hamlet@state.nm.us>]
Sent: Tuesday, May 11, 2021 4:09 PM
To: Charles Lock <CharlesL@kfoc.net>
Subject: [EXTERNAL] RE: (Extension Approval) NRM2010460118 - 90 Day Extension Request

Charles,

I was just looking in the incident file and it looks like this incident has been approved already. Let me know if that's what you guys see also. Looks like it might have been approved on 4/14/2021. Did you get a confirmation e-mail?

Robert Hamlet • Environmental Specialist - Advanced
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811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Hamlet, Robert, EMNRD
Sent: Tuesday, May 11, 2021 2:37 PM
To: 'Charles Lock' <CharlesL@kfoc.net>
Cc: Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <aarond@kfoc.net>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>
Subject: (Extension Approval) NRM2010460118 - 90 Day Extension Request

RE: Incident # **NRM2010460118**

Charles,

Your request for an extension to **August 10th, 2021** is approved.

Please follow the remediation requirements outlined in the attached 8/12/2020 email. Please email me if you have any questions.

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Charles Lock <CharlesL@kfoc.net>

Sent: Monday, May 10, 2021 1:50 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <aarond@kfoc.net>

Subject: [EXT] RE: NRM 2010460118 - South Bell Lake 263H - 90 Day Extension Request

Mr. Bratcher I am requesting a 90 day extension on this remediation. We don't feel that we can move forward until we are able to discuss this with your office. Please let me know when a good date and time would be to discuss this incident.

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337

From: Charles Lock

Sent: Tuesday, April 20, 2021 10:49 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: Shar Harvester <shar.harvester@wescominc.com>; Aaron Daniels <AaronD@kfoc.net>

Subject: RE: NRM 2010460118 - South Bell Lake 263H - 90 Day Extension Request

Mike, I need some guidance from NMOCD on this site. Would it be possible to call you and discuss this site and our investigations into how to proceed? If so would it be possible for us to talk today and at what time would fit your schedule?

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Friday, September 18, 2020 5:29 PM

To: Charles Lock <CharlesL@kfoc.net>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: Shar Harvester <shar.harvester@wescominc.com>

Subject: [EXTERNAL] RE: NRM 2010460118 - South Bell Lake 263H - 90 Day Extension Request

Charles,

I have copied the appropriate environmental staff on this extension request. You should get a response early next week.

Thanks,

Mike Bratcher
NMOCD NM South
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108
575-626-0857 Cell

Hobbs Office:
1625 North French Drive
Hobbs NM 88240
575-393-6161

From: Charles Lock <CharlesL@kfoc.net>
Sent: Friday, September 18, 2020 4:02 PM
To: patricia.martinez@state.nm.us
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Shar Harvester <shar.harvester@wescominc.com>
Subject: [EXT] NRM 2010460118 - South Bell Lake 263H - 90 Day Extension Request

Patricia,

We have completed the horizontal delineation of the spill, ID: NRM2010460118, and are in the process of determining our approach to vertical delineation. The piping creates extremely tight spaces around the liner failure location and we plan on hand augering inside the containment between the piping. Due to caliche layers in the area we may not be able to auger to a sufficient depth so we plan to drill using an auger in the closest adjacent area reachable. We are requesting a 90 day extension to accomplish this and submit the remediation plan. Please let me know if this extension is approved.

Charles Lock
Kaiser-Francis Oil Company
EH&S Manager
918-491-4337