

Fields, Vanessa, EMNRD

From: Lindsay Dumas <ldumas@hilcorp.com>
Sent: Friday, February 1, 2019 7:43 AM
To: Fields, Vanessa, EMNRD; Matt Henderson
Cc: Billings, Bradford, EMNRD; Powell, Brandon, EMNRD; Smith, Cory, EMNRD; Etta Trujillo; Tammy Jones; McNally, Elizabeth
Subject: [EXT] RE: [EXTERNAL] Conditions of Approval for SJ 28-6 #031 meeting January 30, 2019

Morning Vanessa – Thank you for sending over the conditions of approval. Based on our meeting on 1/30/19, and in consultation with operations, Hilcorp has decided to permanently move the facilities (BGT, condensate tank and separator) to allow room to complete the remediation. AES and Hilcorp are working on the placement of the additional vertical soil borings, as well as, new facility placement. As soon as facilities are relocated, Hilcorp will send out notification of sampling for the additional soil borings.

Hilcorp will submit a closure report for the current BGT with the Initial C-141 for the release. Will this be sufficient for BGT closure? Do we need to submit 72 hour notification prior to pulling the pit? Hilcorp plans to remove any stained soils and backfill the pit to allow easier access for soil borings.

Hilcorp will also have AES include the below SVE conditions of approval within the revised SVE plan to be submitted after completion of the soil borings and receipt of the laboratory analytical results. Please note that AES can include mass removal calculations (from vapor concentrations and flow) in the report; however, to clarify, no product recovery is anticipated as part of this project.

Once the schedule for site activities is finalized, Hilcorp will submit a map of the proposed vertical extent soil borings prior to sampling.

Please feel free to call me if you have any questions or concerns.

Kind regards,

Lindsay Dumas
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From: Fields, Vanessa, EMNRD [mailto:Vanessa.Fields@state.nm.us]
Sent: Thursday, January 31, 2019 9:21 AM
To: Lindsay Dumas <ldumas@hilcorp.com>; Matt Henderson <mhenderson@hilcorp.com>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Subject: [EXTERNAL] Conditions of Approval for SJ 28-6 #031 meeting January 30, 2019

Good morning Lindsey,

Per our meeting on January 30, 2019 the OCD stated that HilCorp would need to comply with the following conditions of approval for the remediation on the SJ 28-6 #031.

Requirements from the meeting:

- **HilCorp will have the following items implemented 90 days from meeting (April 30, 219)**
 - A full SVE plan must be submitted, approved by the OCD, installed, and operational by the referenced date above. It is HEC's responsibility to ensure these steps happen timely to ensure compliance with the timeframe provided.
 - By the referenced date the site must also be fully delineated. As discussed at least two additional investigation wells are required to fully delineate the vertical extent of the contamination in the two suspected source areas. These well locations must also be submitted and approved by the OCD prior to implementation to ensure they meet the requirements discussed.

Please note below are standard SVE conditions of approval that you may want to include in your plan or they will be added.

- HEC will maintain a SVE runtime greater than or equal to 90% per quarter.
- HEC will collect an initial gas sample for laboratory analysis shortly after the startup of SVE Operations and then a quarterly sample thereafter. The gas sample will be analyzed for EPA Method 8260 Full List and include Carbon dioxide and Oxygen.
- The gas sample port needs to be installed prior to the inlet of the vacuum pump but, after the convergence of all sve wells.
- HEC will submit to OCD District III a quarterly update report detailing remediation operations the report will include at a minimum.
 - Summary of remediation activity for the quarter.
 - SVE run time
 - SVE mass removal and product recovery.
 - Gas Sample Analysis
- HEC will need a full vertical and horizontal delineation of the remediated areas to ensure full remediation. The locations of these wells will be required to be approved by the OCD prior to implementation.

Thank you,

Vanessa Fields
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