Fields, Vanessa, EMNRD

From: Fields, Vanessa, EMNRD

Sent: Thursday, March 14, 2019 8:01 AM

To: 'Steven Moskal'; 'rmckee@blm.gov'; Smith, Cory, EMNRD; 'Abiodun Adeloye'; Powell, Brandon,

EMNRD

Cc: 'tjlong@eprod.com'; Blagg, Jefferey; 'rherrera@blm.gov'; 'sscott@blm.gov'; 'Jody Gonzales';

'l1thomas@blm.gov'; 'Sabre Beebe'; 'dcrawford@hilcorp.com'

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles ISSUED INC# nVF190732894

Good morning Steve/Sabre

The OCD has issued an incident number to the referenced release. Please submit an initial C-141 referencing incident number nVF1907328394.

All referenced correspondence will be available in the well file.

Thank you,

Vanessa Fields
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 119
Cell: (505) 419-0463

vanessa.fields@state.nm.us

From: Fields, Vanessa, EMNRD

Sent: Tuesday, March 12, 2019 8:27 AM

To: 'Steven Moskal' <Steven.Moskal@BPX.COM>; rmckee@blm.gov; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>;

Abiodun Adeloye <aadeloye@blm.gov>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>

Cc: tjlong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales <JODY.GONZALES@BPX.COM>; l1thomas@blm.gov; Sabre Beebe <Sabre.Beebe@BPX.COM>; dcrawford@hilcorp.com

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Good morning Steve/Sabre,

The referenced stockpiles were sampled on December 14, 218 and final analytical results determined the soil was above closure standard per 19.15.29. BPX will need to submit a remediation plan for stockpiles by April, 12 2019.

Thank you,

Vanessa Fields Environmental Specialist Oil Conservation Division Energy, Minerals, & Natural Resources 1000 Rio Brazos, Aztec, NM 87410 (505)334-6178 ext 119 Cell: (505) 419-0463 vanessa.fields@state.nm.us

From: Steven Moskal <Steven.Moskal@BPX.COM>

Sent: Tuesday, January 22, 2019 9:00 AM

To: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; rmckee@blm.gov; Smith, Cory, EMNRD

<<u>Cory.Smith@state.nm.us</u>>; Abiodun Adeloye <<u>aadeloye@blm.gov</u>>

Cc: <u>tjlong@eprod.com</u>; Blagg, Jefferey <<u>jeffcblagg@aol.com</u>>; <u>rherrera@blm.gov</u>; <u>sscott@blm.gov</u>; Jody Gonzales <<u>JODY.GONZALES@BPX.COM</u>>; l1thomas@blm.gov; Sabre Beebe <<u>Sabre.Beebe@BPX.COM</u>>; dcrawford@hilcorp.com

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Vanessa,

Any direction on how this soil can be put to beneficial use? We have an operator in the area who is looking to obtain approximately 10,000 cubic yards of soil to resurface roads. This soils would not serve any significant threat if used on roadways.

Steve Moskal

Environmental Coordinator BP America Production Co. bpx energy - WBU 1199 Main Ave. | Suite 101 Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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From: Steven Moskal

Sent: Wednesday, January 2, 2019 3:41 PM

To: 'Fields, Vanessa, EMNRD' <Vanessa.Fields@state.nm.us>; rmckee@blm.gov; Smith, Cory, EMNRD

<<u>Cory.Smith@state.nm.us</u>>; Abiodun Adeloye <<u>aadeloye@blm.gov</u>>

Cc: tjlong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<<u>JODY.GONZALES@BPX.COM</u>>; <u>l1thomas@blm.gov</u>; Sabre Beebe <<u>Sabre.Beebe@BPX.COM</u>>

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

All,

Attached are the lab results of the stockpiled soil sampling. The results are non-detect for hydrocarbons and BTEX. The results for chlorides range from 812 ppm to 1,930 ppm. Due to the elevated chloride levels, the soil from these stockpiles could be used in areas where vegetation is not desired, i.e. roadways, and where groundwater is greater than 50 feet in depth and greater than 300' from any sensitive receptors.

Please let me know your thoughts.

Thank you,

Steve Moskal

BP America Production Co. bpx energy - WBU 1199 Main Ave. | Suite 101 Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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From: Fields, Vanessa, EMNRD [mailto:Vanessa.Fields@state.nm.us]

Sent: Wednesday, December 12, 2018 3:01 PM

To: Steven Moskal <Steven.Moskal@BPX.COM>; rmckee@blm.gov; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>;

Abiodun Adeloye <aadeloye@blm.gov>

Cc: tjlong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<JODY.GONZALES@BPX.COM>; l1thomas@blm.gov; Sabre Beebe <Sabre.Beebe@BPX.COM>

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Sounds good Steve.

Thank you,
Vanessa Fields
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 119
Cell: (505) 419-0463
vanessa.fields@state.nm.us

From: Steven Moskal < Steven. Moskal @BPX.COM > Sent: Wednesday, December 12, 2018 3:00 PM

To: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; rmckee@blm.gov; Smith, Cory, EMNRD

<<u>Cory.Smith@state.nm.us</u>>; Abiodun Adeloye <<u>aadeloye@blm.gov</u>>

Cc: tilong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<JODY.GONZALES@BPX.COM>; l1thomas@blm.gov; Sabre Beebe <Sabre.Beebe@BPX.COM>

Subject: Re: [EXT] RE: Riddle F LS 001 Composted Stockpiles

We plan to begin at 8:30 on Friday rather than 9:00.

Thank you,

Steve Moskal Environmental Coordinator BP San Juan (505) 330-9179 steven.moskal@bpx.com

Sent from my mobile device

From: Fields, Vanessa, EMNRD < vanessa.fields@state.nm.us>

Sent: Tuesday, December 11, 2018 11:40 AM

To: Steven Moskal; rmckee@blm.gov; Smith, Cory, EMNRD; Abiodun Adeloye

Cc: tilong@eprod.com; Blagg, Jefferey; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales;

11thomas@blm.gov; Sabre Beebe

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Thank you Steve

Vanessa Fields
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Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 119
Cell: (505) 419-0463

vanessa.fields@state.nm.us

From: Steven Moskal < Steven.Moskal@BPX.COM>

Sent: Tuesday, December 11, 2018 9:33 AM

To: Fields, Vanessa, EMNRD < Vanessa. Fields@state.nm.us>; rmckee@blm.gov; Smith, Cory, EMNRD

<Cory.Smith@state.nm.us>; Abiodun Adeloye <aadeloye@blm.gov>

Cc: tjlong@eprod.com; Blagg, Jefferey < jeffcblagg@aol.com >; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<JODY.GONZALES@BPX.COM>; l1thomas@blm.gov; Sabre Beebe <Sabre.Beebe@BPX.COM>

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

This work is scheduled for Friday, December 14th. We will plan to begin around 9:00AM.

Steve Moskal

BPX Energy - WBU 1199 Main Ave. | Suite 101 Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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From: Fields, Vanessa, EMNRD [mailto:Vanessa.Fields@state.nm.us]

Sent: Monday, December 10, 2018 11:28 AM

To: Steven Moskal; Sabre Beebe; rmckee@blm.gov; Smith, Cory, EMNRD

Cc: tjlong@eprod.com; Blagg, Jefferey; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales; Abiodun Adeloye;

l1thomas@blm.gov

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Good morning Steve,

The OCD will approve sampling of 1-5 point composite sample per every 500 cubic yards.

Please let me know when sampling will be scheduled.

Thank you,

Vanessa Fields Environmental Specialist Oil Conservation Division Energy, Minerals, & Natural Resources 1000 Rio Brazos, Aztec, NM 87410 (505)334-6178 ext 119

Cell: (505) 419-0463

vanessa.fields@state.nm.us

From: Steven Moskal < Steven. Moskal@BPX.COM > Sent: Monday, December 10, 2018 10:23 AM

To: Fields, Vanessa, EMNRD < Vanessa.Fields@state.nm.us; Sabre Beebe < Sabre.Beebe@BPX.COM; rmckee@blm.gov;

Smith, Cory, EMNRD < Cory. Smith@state.nm.us>

Cc: tjlong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<JODY.GONZALES@BPX.COM>

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Vanessa,

There is approximately 12,000 cubic yards of soil stockpiled. Based on the sampling interval requested below, this would tally up to 120 samples and would take approximately 2 weeks to complete sampling alone.

Attached are the results of the sampling performed in August of 2005. The piles were sampled individually, for piles 5-8 and combined piles for piles 1&2 and 3&4. Please note, none of the results exceeded 100 ppm, even including MRO hydrocarbons. With continued degradation from the composting, I would assume the hydrocarbon levels to be even lower given the time lapsed.

I propose to samples piles 1, 2, 3 and 4 in halves, each half with a 5 point composite and piles 5-8 as thirds, with each third as a composite.

Please let me know if you approve.

Thank you,

Steve Moskal
BPX Energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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From: Fields, Vanessa, EMNRD [mailto:Vanessa.Fields@state.nm.us]

Sent: Monday, December 10, 2018 9:00 AM

To: Steven Moskal; Sabre Beebe; rmckee@blm.gov; Smith, Cory, EMNRD

Cc: tjlong@eprod.com; Blagg, Jefferey; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Good morning Steve,

The OCD request the sampling to be conducted in the same manner as the Soil Shredding protocol. 1- 5 point composite sample will be collected from every 100 cubic feet stockpile. BP will need to analyze the soil for the following constituents. 8015, 8021 and Chlorides.

Thank you,

Vanessa Fields Environmental Specialist Oil Conservation Division Energy, Minerals, & Natural Resources 1000 Rio Brazos, Aztec, NM 87410 (505)334-6178 ext 119

Cell: (505) 419-0463

vanessa.fields@state.nm.us

From: Steven Moskal < Steven.Moskal@BPX.COM>

Sent: Monday, December 10, 2018 8:01 AM

To: Fields, Vanessa, EMNRD < Vanessa.Fields@state.nm.us; Sabre Beebe < Sabre.Beebe@BPX.COM; rmckee@blm.gov;

Smith, Cory, EMNRD < Cory. Smith@state.nm.us >

Cc: tilong@eprod.com; Blagg, Jefferey <jeffcblagg@aol.com>; rherrera@blm.gov; sscott@blm.gov; Jody Gonzales

<JODY.GONZALES@BPX.COM>

Subject: RE: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Vanessa,

I would like to set up sampling of the stockpiles on Friday 12/14. Please provide guidance on what you will require, I assume TPH, BTEX and CI, but let me know if you'd like to see something else. We will use a backhoe to dig into each of the piles, as previously performed, to collect 5 point composites from each pile; similar to soil shredding protocol.

Thank you,

Steve Moskal

BPX Energy - WBU 1199 Main Ave. | Suite 101 Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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From: Fields, Vanessa, EMNRD [mailto:Vanessa.Fields@state.nm.us]

Sent: Monday, December 03, 2018 8:04 PM

To: Sabre Beebe; Steven Moskal; rmckee@blm.gov; Smith, Cory, EMNRD

Cc: Matthew Baca; tilong@eprod.com; Blagg, Jefferey; rherrera@blm.gov; sscott@blm.gov

Subject: Re: [EXT] RE: Riddle F LS 001 Composted Stockpiles

Good evening Everyone,

I am currently out of town at a training this week, I will follow up on Monday and we can discuss a path forward.

Thank you, Vanessa Fields

Get Outlook for iOS

On Mon, Dec 3, 2018 at 4:55 PM -0600, "Sabre Beebe" < Sabre. Beebe@BPX.COM > wrote:

All.

The last communication I had on this soil stock pile was with Roger Herrera with the BLM. This was back in August. At that time the BLM – Roger was proposing that this soil be utilized in the area for covering exposed pipelines and repairing roads. It was stated that having this in the area could save wear and tear on roads by not having to truck in soils. Roger told me he was working this proposal through the BLM internally and would let me know when a final decision was made. I have not receive any final decision at this point in time from Roger.

It would be beneficial in my opinion if the BLM and the NMOCD could collaborate on this issue and then notify Steve and myself of what the final decision is on what will be required of BPX to come into compliance with both State and Federal regulations on this matter. I would be available to meet with both agencies to discuss a path forward if necessary. This stock pile is located on a plug and abandoned well pad which is my responsibilities and I have Steve available to advise and help out if needed.

In addition if someone could also confirm the seasonal restrictions for this area I would greatly appreciate it so that everyone on the email is of the same understanding on time frame to start and complete work based on the decision that is reached by the BLM on what they want to happen with this soil.

Thank you all for your time and consideration in this matter.

Through chaos comes opportunity

Sabre Beebe

L48 Compliance Specialist - San Juan Basin Asset

Mobile: 970-779-9398

Email: sabre.beebe@bpx.com

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From: Steven Moskal

Sent: Monday, December 03, 2018 12:36 PM

To: rmckee@blm.gov; Fields, Vanessa, EMNRD; Cory Smith - NMOCD (Cory.Smith@state.nm.us) **Cc:** Matthew Baca; tjlong@eprod.com; jeffcblagg@aol.com; rherrera@blm.gov; sscott@blm.gov

Subject: Riddle F LS 001 Composted Stockpiles

Randy, Cory and Vanessa,

BPX is working to remove the treated soil stockpiles from the subject site. Based on a conversation I had with Vanessa on Thursday 11/29, the NMOCD will likely be seeking additional samples from the stockpiles to ensure the piles are of satisfactory standing prior to granting closure. Vanessa is currently out of the office, scheduled to return 12/10. I will await direction from the NMOCD prior to proceeding. BPX is currently collecting resources and pricing to expedite executing this sampling.

Currently, Enterprise Products plans to use this material for padding and covering of their lines in the area. However, due to seasonal closures in the area, EPROD will not be able to remove the soil until spring of 2019. I understood that the BLM had facilitated the use of this material based on our conversations in May of 2018. I apologize as I had not heard any movement since.

Steve Moskal
BPX Energy - WBU
1199 Main Ave. | Suite 101
Durango | CO | 81301

Direct: 505.330.9179 steven.moskal@bpx.com



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