

**From:** [Yu, Olivia, EMNRD](#)  
**To:** "Tim McMinn"  
**Cc:** [Oberding, Tomas, EMNRD](#)  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)  
**Date:** Thursday, April 20, 2017 1:13:00 PM  
**Attachments:** [ApprovedWP\\_RP4437\\_SOGO\\_SFPRR\\_CAP\\_041117.pdf](#)

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Mr. McMinn:

NMOCD approves the proposed remediation plan for 1RP-4437. Please see the attachment for your records.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

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**From:** Tim McMinn [mailto:[tim@etechenv.com](mailto:tim@etechenv.com)]  
**Sent:** Thursday, April 13, 2017 11:33 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Olivia

Attached is the updated CAP with the work plan that we discussed for your review and approval. Let me know if you have any questions.

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
[P.O. Box 62228](#)  
[Midland, Texas 79711](#)  
Phone: [432-563-2200](tel:432-563-2200)  
Mobile: [432-967-9062](tel:432-967-9062)  
Fax: [432-563-2213](tel:432-563-2213)  
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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, April 03, 2017 2:31 PM  
**To:** Tim McMinn; Oberding, Tomas, EMNRD  
**Cc:** 'Bill Priebe'; 'Fred Holmes'  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Dear Tim:

Thank you for the update.

A pleasure to meet you,  
Olivia

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**From:** Tim McMinn [<mailto:tim@etechnv.com>]  
**Sent:** Monday, April 3, 2017 1:01 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>  
**Cc:** 'Bill Priebe' <[bpriebe@stanolind.com](mailto:bpriebe@stanolind.com)>; 'Fred Holmes' <[fred@etechnv.com](mailto:fred@etechnv.com)>  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Olivia

Thank you for taking the time out of your busy schedule to meet with me on Friday. We will submit a CAP to excavate the impacted areas to a depth of 4 feet below ground surface and install a liner that is at least 20 mils. Hope you had a nice weekend.

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
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[Midland, Texas 79711](#)  
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sender by return mail and delete it.

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Wednesday, March 29, 2017 1:16 PM  
**To:** Tim McMinn; Oberding, Tomas, EMNRD  
**Cc:** [geoff@etechnv.com](mailto:geoff@etechnv.com); 'Bill Priebe'; Fred Holmes  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Mr. McMinn:

Yes. Will you be available to meet in the OCD-Hobbs office at 2pm on Friday, Mar 31?

Olivia

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**From:** Tim McMinn [<mailto:tim@etechnv.com>]  
**Sent:** Wednesday, March 29, 2017 7:58 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>  
**Cc:** [geoff@etechnv.com](mailto:geoff@etechnv.com); 'Bill Priebe' <[bpriebe@stanolind.com](mailto:bpriebe@stanolind.com)>; Fred Holmes <[fred@etechnv.com](mailto:fred@etechnv.com)>  
**Subject:** FW: SOGO III SFPRR Lease Fire (Event 4437)

Olivia

As we discussed yesterday on the phone, below is the correspondence that I had with Kristen in September regarding her request to delineate to 250 ppm. I'll be in Eddy county sampling a site on Friday, would you be available at your office in the afternoon to discuss options going forward for closing this site?

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
[P.O. Box 62228](#)  
[Midland, Texas 79711](#)  
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**From:** Tim McMinn [<mailto:tim@etechnv.com>]  
**Sent:** Wednesday, September 28, 2016 11:44 AM

**To:** 'Lynch, Kristen, EMNRD'  
**Cc:** 'Bill Priebe'; 'Fred Holmes'; 'Oberding, Tomas, EMNRD'  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Thanks Kristen,

The analytical is at the back of the attached report. We will proceed with delineation to 250 per your requirement.

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
[P.O. Box 62228](#)  
[Midland, Texas 79711](#)  
Phone: [432-563-2200](#)  
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**From:** Lynch, Kristen, EMNRD [<mailto:Kristen.Lynch@state.nm.us>]  
**Sent:** Wednesday, September 28, 2016 11:26 AM  
**To:** Tim McMinn  
**Cc:** 'Bill Priebe'; Fred Holmes; Oberding, Tomas, EMNRD  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Good Morning,

I would like to see the analytical data for this site, if you could send them to me. NMOCD requires delineation to 250 CL-, prior to getting a work plan. Yes you will need to do further delineation to achieve our requirement.

Thank You,

*Kristen D. Lynch*  
*Environmental Specialist, District 1*  
*Oil Conservation Division, EMNRD*  
*(575) 393-6161 ext. 111*  
*575-370-3180 (emergency-cell)*

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 ground water, 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, local laws and/or regulations.



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**From:** Tim McMinn [<mailto:tim@etechenvironment.com>]  
**Sent:** Tuesday, September 27, 2016 6:08 PM  
**To:** Lynch, Kristen, EMNRD  
**Cc:** 'Bill Priebe'; Fred Holmes  
**Subject:** RE: SOGO III SFPRR Lease Fire (Event 4437)

Kristen,

As discussed this morning for the above project we dug test trenches down to 7-8 feet to try to reach chloride levels of 250 ppm. Utilizing the backhoe, we were unable to reach 250 ppm, however we did have readings between 900-3,000 ppm. For the 'Middle' 8 foot sample, I believe that to be an outlier. If further investigation is needed in that area, or other areas please let me know. I've attached the data that we have as of now and our proposal for the cleanup for your review and approval. If you have any questions, let me know.

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
[P.O. Box 62228](#)  
[Midland, Texas 79711](#)  
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**From:** Tim McMinn [<mailto:tim@etechenvironment.com>]  
**Sent:** Monday, September 26, 2016 3:46 PM  
**To:** 'Kristen.Lynch@state.nm.us'  
**Subject:** SOGO III SFPRR Lease Fire (Event 4437)

Kristen

We have been contracted out by SOGO to cleanup the SFPRR lease fire. Could you please give me a call? I would like to our delineation data. You may reach me on my cell at 432-967-9062.

Thanks,

Tim McMinn  
Etech Environmental & Safety Solutions, Inc.  
[P.O. Box 62228](#)

[Midland, Texas 79711](#)

Phone: [432-563-2200](#)

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**From:** Geoff Leking  
**To:** [Yu, Olivia, EMNRD](#); [Oberding, Tomas, EMNRD](#)  
**Cc:** ["Bill Priebe"](#); [brian@etechenv.com](mailto:brian@etechenv.com); ["Tim McMinn"](#)  
**Subject:** RE: Revised SOGO SFPRR A CAP - 1RP 4437  
**Date:** Tuesday, March 28, 2017 2:56:26 PM

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Olivia

To clarify, using N1 as an example, we are below a chloride concentration of 600 mg/kg at 4' below ground surface (bgs) with a field test value of 510 mg/kg, 6' bgs with a field test value of 380 mg/kg, and 8' bgs with a laboratory result of 223 mg/kg. Therefore, to verify the approximate 10' interval below 600 mg/kg, we will analyze the 12' bgs sample which is the minimum depth of confirmation sample.

Geoff Leking

Etech Environmental & Safety Solutions, Inc.  
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Midland, Texas 79711  
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-----Original Message-----

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
Sent: Monday, March 27, 2017 10:34 AM  
To: Geoff Leking; Oberding, Tomas, EMNRD  
Cc: 'Bill Priebe'; [brian@etechenv.com](mailto:brian@etechenv.com); 'Tim McMinn'  
Subject: RE: Revised SOGO SFPRR A CAP - 1RP 4437

Dear Mr. Leking:

Please note and address these concerns regarding the delineation workplan for 1RP-4437.

1. NMOCD's permissible chloride levels for delineation is 600 mg/kg, not 1000 mg/kg and maintained for optimally 10 ft. further in depth with some flexibility due to depth to groundwater at this location. As such, further delineation is required for N1, N2, NW, and Middle with depth intervals < 5 ft. I will accept the following minimum depth of bottom confirmation samples:  
N1 at 12 ft. bgs  
N2 at 20 ft. bgs  
NW at 18 ft. bgs  
Middle a at 24 ft. bgs

2. Bottom confirmation samples at minimum 8 ft. bgs. are needed at SE and SW corners.

3. Please provide additional details about the proposed remediation procedure using DeSalt. NMOCD does not approve of using DeSalt to flush chlorides down the soil profile without a plan to collect and/or recycle the resultant effluent. How much fresh water will be used? How will the effluent be collected for disposal or recycled for additional flushings?

Any laboratory analyses need to be accompanied by field chloride tests. Please let me know if clarification is needed or you would like to request a meeting.

Thanks,  
Olivia

-----Original Message-----

From: Geoff Leking [<mailto:geoff@etechnv.com>]  
Sent: Monday, March 20, 2017 11:27 AM  
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
Cc: 'Bill Priebe' <bpriebe@stanolind.com>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>  
Subject: Revised SOGO SFPRR A CAP - 1RP 4437

Olivia

Etech Environmental & Safety Solutions, Inc. is pleased to submit to you the revised SOGO III, SFPRR A - 1RP 4437 Corrective Action Plan. The following edits have been made:

- 1) The annotated imagery has been edited to demarcate which soil samples were collected on 9/13/2016 and which soil samples were collected on 9/22/2016. In addition, the annotation has been edited to demarcate which chloride concentrations are based on laboratory analysis and which are based on field tests.
- 2) The annotated imagery has been edited to identify which soil bore log corresponds to which sample ID.
- 3) The text of the report has been edited to indicate that the soil samples collected on 9/13/2016 were collected utilizing a backhoe.

Please contact me if you have questions or concerns. Thank you, Olivia.

Geoff Leking

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-----Original Message-----

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Thursday, March 16, 2017 8:11 AM

To: Geoff Leking

Cc: Bill Priebe

Subject: RE: SOGO SFPRR CAP

Dear Mr. Leking:

Please make the necessary edits to the delineation workplan for IRP-4437 and I will review again.

Olivia

-----Original Message-----

From: Geoff Leking [<mailto:geoff@etechnv.com>]

Sent: Tuesday, March 14, 2017 12:20 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Bill Priebe <bpriebe@stanolind.com>

Subject: SOGO SFPRR CAP

Olivia

Besides the edits you asked me to make, does the plan seem adequate? Thank you.

Sent from my iPhone