

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Kerry Egan](#); [Naranjo, Mark](#)  
**Cc:** [Austin Weyant](#); [Ruben Molina](#); [Heather Patterson](#)  
**Subject:** RE: Lucid Presidente Pipeline  
**Date:** Tuesday, January 16, 2018 8:49:00 AM  
**Attachments:** image003.png

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Dear Mr. Egan:

NMOCD will approve of backfilling for 1RP-4874. Please clarify these concerns before closure is granted:

1. Were all soil from the excavation (45 ft. L x 15 ft. W x 11 ft. D) disposed at a NMOCD approved landfill or was a portion reserved with the purpose for backfilling?
2. At what depth were sidewall samples taken?
3. Provide photo documentation for delineation and remediation activities.

Also, please be advised that all confirmation samples- bottom and sidewalls- must be tested for BTEX, TPH extended, and chlorides. For 1RP-4874, due to the prompt response, field data for chlorides will be accepted in place of laboratory analysis.

Like approval from NMSLO required. For the interim, please submit delineation and closure reports to Mark Naranjo for review.

Thanks,  
Olivia

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**From:** Kerry Egan [mailto:KEgan@lucid-energy.com]  
**Sent:** Monday, January 15, 2018 12:24 PM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** Austin Weyant <austin.weyant@soudermiller.com>; Ruben Molina <RMolina@lucid-energy.com>; Heather Patterson <heather.patterson@soudermiller.com>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Subject:** RE: Lucid Presidente Pipeline

Ms. Yu,

I wanted to follow up with you regarding the remediation project referenced below. I'm requesting a determination on the backfill and closure request as soon as possible. The excavation has been open for sometime now, and the continued presence of the open excavation poses several liability and safety concerns. The grazer on the state land has continued to voice his concerns to Lucid regarding the excavation. Additionally, EOG Resources has a produced water line exposed and elevated in the excavation. The longer this line hangs exposed in the excavation the greater the risk of damage or failure occurring to that and greatly worsening the situation.

Please let us know if there are any remaining concerns you have with the work we've done. If not please provide confirmation on our backfill and closure requests.

Respectfully,  
**Kerry Egan**  
Environmental Compliance Coordinator



326 W. Quay  
Artesia, NM Office: (575) 810-6021 | Cell: (575) 513-8988  
[Kegan@lucid-energy.com](mailto:Kegan@lucid-energy.com) | [www.lucid-energy.com](http://www.lucid-energy.com)

*\*\*Please note the updated email address and numbers.*

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**From:** Heather Patterson [<mailto:heather.patterson@soudermiller.com>]  
**Sent:** Wednesday, January 10, 2018 3:49 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Cc:** Austin Weyant <[austin.weyant@soudermiller.com](mailto:austin.weyant@soudermiller.com)>; Kerry Egan <[KEgan@lucid-energy.com](mailto:KEgan@lucid-energy.com)>;  
Ruben Molina <[RMolina@lucid-energy.com](mailto:RMolina@lucid-energy.com)>  
**Subject:** RE: Lucid Presidente Pipeline

Ms. Yu,

Please find the attached closure report for the Lucid Energy, Presidente Pipeline release.

We also requested a backfill approval on this location last month, which we have yet to receive an answer on. I would be happy to answer any further questions you might have on this project, feel free to call or email me anytime.

Thank you,

Heather Patterson  
Staff Scientist  
**Souder, Miller & Associates**  
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Carlsbad, NM 88220  
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**From:** Heather Patterson  
**Sent:** Monday, December 11, 2017 9:58 AM  
**To:** 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)

**Cc:** Austin Weyant <[austin.veyant@soudermiller.com](mailto:austin.veyant@soudermiller.com)>; Kerry Egan <[KEgan@lucid-energy.com](mailto:KEgan@lucid-energy.com)>;  
Ruben Molina <[RMolina@lucid-energy.com](mailto:RMolina@lucid-energy.com)>

**Subject:** RE: Lucid Presidente Pipeline

Ms. Yu,

Thank you for your quick response. Here are the answers to your questions:

1. We did not perform an across the bottom, five-point composite, but rather I grabbed one sample from either side of the pipe at the release point. The two points were really very close to each other. I composited these two samples to ensure I was clean on BOTH sides of the pipeline.
2. Both spill piles are located next to the excavation on the North side within the pipeline ROW.
3. There are many reasons to sample your spill piles. Namely for waste management purposes. Also, when crews repair a pipeline, they must excavate much more soil (clean overburden) than just the impacted soils. We try to isolate the clean overburden from the impacted soils so as not to unnecessarily dispose of non-impacted soils. Sampling ensures everything we keep is a well below RRALs.
4. The soil was not placed on plastic as the liquid loss was minimal and there were no saturated soils. This excavation was performed late at night, and given that this was primarily a natural gas release and the chance of leaching was low, preference was given to NOT disturbing the surrounding vegetation. Placing a liner at this location would have meant going outside the ROW and clearing a large area of vegetation, which would have resulted in greater damage. Subsequent sampling confirmed that a liner was not necessary.

I hope this adequately answers your questions, but if not, give me a call anytime.

Thank you,

**Heather Patterson**

*Staff Scientist*

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

**Sent:** Friday, December 8, 2017 4:10 PM

**To:** Heather Patterson <[heather.patterson@soudermiller.com](mailto:heather.patterson@soudermiller.com)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)

**Cc:** Austin Weyant <[austin.veyant@soudermiller.com](mailto:austin.veyant@soudermiller.com)>; Kerry Egan <[KEgan@lucid-energy.com](mailto:KEgan@lucid-energy.com)>;

Ruben Molina <[RMolina@lucid-energy.com](mailto:RMolina@lucid-energy.com)>

**Subject:** RE: Lucid Presidente Pipeline

Ms. Patterson:

Please address these concerns regarding the delineation for 1RP-4874:

1. Please be advised that NMOCD does not accept composite samples for delineation or remediation.
2. Figure 2 does not indicate the locations of SP1 and SP2.
3. Is there a rationale for sampling stockpiles?
4. Were the stockpiled soil on bermed plastic liner?

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:** Heather Patterson [<mailto:heather.patterson@soudermiller.com>]  
**Sent:** Friday, November 17, 2017 12:55 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Cc:** Austin Weyant <[austin.weyant@soudermiller.com](mailto:austin.weyant@soudermiller.com)>; Kerry Egan <[KEgan@lucid-energy.com](mailto:KEgan@lucid-energy.com)>;  
Ruben Molina <[RMolina@lucid-energy.com](mailto:RMolina@lucid-energy.com)>  
**Subject:** Lucid Presidente Pipeline

Good Afternoon,

**Attached is the Delineation Plan for the Lucid Presidente Pipeline. Once the site is fully delineated we will send a work plan that includes the revegetation plan to meet NMSLO requirements.**

Thank you,

**Heather Patterson**  
*Staff Scientist*  
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