

**From:** Naranjo, Mark  
**To:** [Yu, Olivia, EMNRD](#); [Todd Yocham](#)  
**Cc:** [mymerch@penrocoil.com](#); [aggie@penrocoil.com](#)  
**Subject:** RE: Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans  
**Date:** Monday, January 29, 2018 1:12:49 PM

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Mr. Yocham,

NMSLO approves your delineation plan, please follow the additional stipulations Olivia has required. Thank you.

Mark Naranjo  
Assistant Division Director  
Field Operations Division  
575.623.4979 Office  
575.626.2678 Cell  
575.623.9200 Fax  
New Mexico State Land Office  
1001 S. Atkinson  
Roswell, NM 88203  
[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)  
[NMStatelands.org](http://NMStatelands.org)

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, January 29, 2018 11:43 AM  
**To:** Todd Yocham <[tyocham@desertproduction.com](mailto:tyocham@desertproduction.com)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** [mymerch@penrocoil.com](#); [aggie@penrocoil.com](#)  
**Subject:** RE: Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans

Mr. Yocham:

NMOCD will approve of the proposed delineation plan for 1RP-4802 with these conditions:

1. In addition to the 4 proposed sample locations on the lease road, at least 1 sample location must be established in the vicinity of the tanks, where the release originated. Please be advised that additional sample locations probably will be necessary to fully characterize the

release.

2. Permissible levels for horizontal and vertical delineation is 600 mg/kg.
3. Each sample location must demonstrate permissible levels of BTEX, TPH extended, and chlorides for at least 2 depths: depth obtained and depth maintained at least 5 ft. further.
4. All laboratory analyses should have accompanying field data.

Like approval from NMSLO required. Mark Naranjo is the correspondent in the interim.

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:** Todd Yocham [<mailto:tyocham@desertproduction.com>]  
**Sent:** Wednesday, January 17, 2018 3:55 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Groves, Amber <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>; [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com); [aggie@penrocoil.com](mailto:aggie@penrocoil.com)  
**Subject:** RE: Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans

Dear Ms. Yu,

Thank you for your approval of the proposed delineation plan for 1RP-4819.

Attached please find the revised proposed delineation plan for 1 RP-4802. I have added 2 more sample points to track further down the road.

Thanks,

Todd Yocham

**Todd M. Yocham**  
*Petroleum Engineer*  
**C:432.770.0615**

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**Penroc Oil Corporation**  
**1515 W Calle Sur, Suite 174**  
**Hobbs, NM 88241**

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, December 08, 2017 3:05 PM  
**To:** Todd Yocham  
**Cc:** Groves, Amber; [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com); [aggie@penrocoil.com](mailto:aggie@penrocoil.com); [ECallahan@berkeleyoil-gas.com](mailto:ECallahan@berkeleyoil-gas.com)  
**Subject:** RE: Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans

Dear Mr. Yocham:

NMOCD rejects the proposed delineation plan for 1RP-4802. Please review the Google Earth image from November 2017. The impacted area is larger than indicated in the workplan.

NMOCD will accept the proposed delineation plan for 1RP-4819.

Please be advised that for complete vertical delineation, soil samples analyzed by an accredited laboratory must demonstrate permissible levels of BTEX, TPH extended, and chlorides for at least 2 depths: depth obtained and depth maintained at least 5 feet further in depth. Permissible levels for horizontal and vertical delineation is 600 mg/kg.

Like approval from NMSLO is required. NMSLO may have additional stipulations.

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:** Todd Yocham [<mailto:tyocham@desertproduction.com>]  
**Sent:** Wednesday, November 8, 2017 1:16 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Groves, Amber <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>; [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com); [aggie@penrocoil.com](mailto:aggie@penrocoil.com);

[ECallahan@berkleyoil-gas.com](mailto:ECallahan@berkleyoil-gas.com)

**Subject:** Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans

Oil Conservation Division (OCD) – District 1  
1625 N. French Dr.  
Hobbs, NM 88240  
Attn: Olivia Yu

Ms. Yu,

Attached please find the submitted work plans for the characterization of impacts associated with the release of produced water and crude oil for the following Remediation Cases:

Remediation Case No. 1RP-4802  
State E 10 Strawn Tank Battery  
And  
Remediation Case No. 1RP-4819  
State E 14

Please let me know if you have any questions.

Thank you,

Todd

**Todd M. Yocham**  
*Petroleum Engineer*  
**C:432.770.0615**

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**Penroc Oil Corporation**  
**1515 W Calle Sur, Suite 174**  
**Hobbs, NM 88241**

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