

From: Groves, Amber
To: "Dena"
Cc: [Kevin Ware](mailto:Kevin.Ware@oilfieldwaterlogistics.com); ["nbannister@oilfieldwaterlogistics.com"](mailto:'nbannister@oilfieldwaterlogistics.com'); [Roger Johnson](mailto:Roger.Johnson@owlinv.com); [Elmo Seabolt](mailto:Elmo.Seabolt@oilfieldwaterlogistics.com); [Rebecca Uhr](mailto:Rebecca.Uhr@oilfieldwaterlogistics.com); [Yu, Olivia](mailto:Yu.Olivia@oilfieldwaterlogistics.com), [EMNRD](mailto:EMNRD@oilfieldwaterlogistics.com); [Billings, Bradford](mailto:Billings.Bradford@oilfieldwaterlogistics.com), [EMNRD](mailto:EMNRD@oilfieldwaterlogistics.com)
Subject: RE: October 28, 2016 Spill Remediation Proposal- 1RP 4497
Date: Wednesday, November 15, 2017 2:35:16 PM
Attachments: image002.png
image004.png

Dena,

As SLO has repeatedly requested that the pipelines be excavated, is OWL planning to request full site closure or a deferral for this RP with NMOCD?

Also, as previously stated, a revegetation plan will be required to be added to the work plan that was submitted to NMOCD. Revegetation infeasibility will not be accepted as it is a requirement of remediation's on state trust land and it is also a requirement of OWL's ROW contract.

Thank you,

Amber Groves

Remediation Specialist

Field Operations Division

(575)392-3697

(575)263-3209 cell

New Mexico State Land Office

2827 N. Dal Paso Suite 117

Hobbs, NM 88240

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From: Dena [<mailto:dena@kjenvironmental.com>]
Sent: Friday, October 13, 2017 8:14 AM
To: Groves, Amber <agroves@slo.state.nm.us>
Cc: Kevin Ware <kevin@kjenvironmental.com>; 'nbannister@oilfieldwaterlogistics.com' <[nbannister@oilfieldwaterlogistics.com](mailto:'nbannister@oilfieldwaterlogistics.com')>; Roger Johnson <rjohnson@owlinv.com>; Elmo Seabolt <ESeabolt@oilfieldwaterlogistics.com>; Rebecca Uhr <ruhr@oilfieldwaterlogistics.com>
Subject: October 28, 2016 Spill Remediation Proposal- 1RP 4497

Good morning Amber,

OWL has been in contact with the OCD through their attorney and has been instructed to proceed in the following manner, regarding the October 28, 2016 spill on SLO land (1RP 4497):

As agreed upon with the OCD, no excavation will be completed for the soil located above, beneath, between, and extending ten (10) feet horizontally from the extents of the pipelines, in order to maintain structural stability of the pipelines.

OWL will reevaluate the spill area to confirm that all areas outside of the 10' buffer for the pipelines with soil sample results exceeding 800 ppm Chlorides have been properly remediated. If any additional remediation is required to comply with the 800 ppm Chloride remediation goal, OWL will continue remediation efforts until the remediation goal is achieved. At the conclusion of the remediation activities, OWL will provide the SLO with documentation of clearance sampling to demonstrate the effectiveness of the remediation. Any torn poly liner will be replaced prior to backfilling excavations.

OWL will explore the available avenues for revegetation of the spill area outside of the proposed road right-of-way; and if deemed feasible, will provide the SLO with a revegetation plan. If revegetation is determined to be infeasible, OWL will meet with the SLO to discuss reasonable monetary compensation for lost vegetation.

To update you regarding progress on obtaining the necessary permits:

On the assignment of the ROW from EOG to OWL, it was determined that an as built survey was required. That has been ordered and completed. Final documentation for the assignment has been received and is being commented on. We expect final assignment to be complete this month. The Right-Of-Entry Permit application has been completed and is being submitted with the associated fee.

Please let me know if you have any questions, and whether you approve for us to proceed with the plan as outlined above.

Thank you!



DENA M. VANDENBERG, REM, LEED AP

Director of Environmental Services

500 Moseley Road Cross Roads, Texas 76227

M (214)364-7627 O (940)387-0805 F (940)387-0830

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From: Dena
To: [NMSLO \(Hobbs/Amber Groves\)](#); [Yu, Olivia, EMNRD](#)
Cc: [Kevin Ware](#); "[nbannister@oilfieldwaterlogistics.com](#)"; [Roger Johnson](#)
Subject: Revegetation and Noxious Weed Plan
Date: Friday, November 17, 2017 9:11:10 AM
Attachments: Revegetation and Noxious Weed Plan.pdf

Good morning, Amber!

We will be looking into requesting a deferral from NMOCD. We have completed the Revegetation and Noxious Weed Plan, which is attached for your review. Please let me know if you have any questions. Thank you!



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