

From: [Yu, Olivia, EMNRD](#)
To: ["Sarah Johnson"; Naranjo, Mark](#)
Cc: [Mark Larson; jsoriano@legacyp.com](#)
Subject: RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018
Date: Thursday, March 8, 2018 11:36:00 AM
Attachments: approved_1RP-4501 High Plains 22 State Com #1 Delineation Plan_v2.pdf
RP4501_HighPlains_ArcGISmap.pdf

Ms. Johnson:

Thanks for your prompt response. NMOCD approves of the proposed delineation plan for 1RP-4501 with these additional requests:

- One more delineation sample location as close as logistically possible near the tanks. See attachment.
- Liner integrity evaluation near the heater treater. If not intact, NMOCD requests establishment of a delineation sample location.
- Surficial cleaning of the impacted area around the wellhead, as feasible.

Please confirm or inform for clarification. Like approval from NMSLO required.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Sarah Johnson [mailto:SJohnson@laenvironmental.com]
Sent: Wednesday, March 7, 2018 10:18 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Mark Larson <Mark@laenvironmental.com>; jsoriano@legacyp.com
Subject: RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Dear Ms. Yu,

Condition:

Please address these concerns regarding the proposed delineation plan for 1RP-4501:

- *Appendix B is incomplete. Please submit a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.*

- *Aerial imagery from ArcGIS and Google Earth depict visibly impacted area outside the lined containment on the Northwest side. At least one horizontal delineation sample location should be located in the affected area.*
- *Demarcate proposed delineation sample locations within the lined containment based on photo and aerial imagery from ArcGIS.*

Response:

- Please see attached the amended report including a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.
- LAI has added one (1) sample locations on the Northwest side of the containment to account for the stained area.
- LAI has added four (4) sample points within the lined containment to account for samples that may be collected due to any tears or breaks in the liner. Your approval of the amended proposed sample locations is requested.

Respectfully,

Sarah Johnson
Staff Geologist
507 N. Marienfeld St., Suite 205
Midland, Texas 79701
Office – 432-687-0901
Cell – 432-664-5357
Fax – 432-687-0456
sjohnson@laenvironmental.com



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, March 5, 2018 11:18 AM
To: Sarah Johnson; Naranjo, Mark
Cc: Mark Larson; jsoriano@legacylp.com
Subject: RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Ms. Johnson:

Please address these concerns regarding the proposed delineation plan for 1RP-4501:

- Appendix B is incomplete. Please submit a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.
- Aerial imagery from ArcGIS and Google Earth depict visibly impacted area outside the lined containment on the Northwest side. At least one horizontal delineation sample location should be located in the affected area.
- Demarcate proposed delineation sample locations within the lined containment based on

photo and aerial imagery from ArcGIS.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Sarah Johnson [<mailto:SJohnson@laenvironmental.com>]
Sent: Thursday, February 15, 2018 2:08 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Mark Larson <Mark@laenvironmental.com>; jsoriano@legacyp.com
Subject: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of Legacy Reserves Operating, LP (Legacy), submits the attached delineation plan for a crude oil spill at the High Plains 22 State Com #1 (1RP-4501) in Lea County, New Mexico. Your approval of the delineation plan is requested. Please feel free to contact Manuel Soriano with Legacy at (432) 269-8806 or jsoriano@legacyp.com, or me at (432) 687-0901 (office) or (432) 664-5357 (cell) if you have any questions.

Respectfully,

Sarah Johnson
Staff Geologist
507 N. Marienfeld St., Suite 205
Midland, Texas 79701
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