

From: [Yu, Olivia, EMNRD](#)
To: ["Kimberly M. Wilson"; "Tucker, Shelly"](#)
Cc: mike.shoemaker@dv.com; [David J. Adkins](#)
Subject: RE: Billiken 6 Federal #1 Work Plan
Date: Thursday, March 8, 2018 7:37:00 AM
Attachments: image001.png
image002.png
image003.png
image004.png
approved_1RP4761_Billiken 6 Fed data table site map and lab reports.pdf

Good morning Ms. Wilson:

Are there data for the borders of the areas with different depths of excavation: between 3 ft. and 1 ft. excavated area; between 3 ft. and 1.5 ft.; and between 1.5 ft. and 1 ft.? This was a condition stipulated in the email dated December 7, 2017: "Each different depth of excavation must have at least one set of confirmation bottom and sidewalls."

If not, please be advised that for future 1RPs, confirmation samples from the borders of differing depths of excavation will be required for backfill approval.

NMOCD will grant backfill approval for 1RP-4761. Like approval from BLM required.

Thanks,
Olivia

From: Kimberly M. Wilson [mailto:kwilson@talonlpe.com]
Sent: Tuesday, March 6, 2018 3:10 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: mike.shoemaker@dv.com; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

RE: Devon Energy -- Billiken 6 Federal #1H (CTB) * 30-025-42685 * DOR: 7-4-2017 * 1RP-4761

Good Afternoon Olivia,

Please find attached the site map and data table along with the laboratory reports for the above referenced location.

On behalf of our client, we would respectfully request permission to begin backfilling activities on this project.

If you have any questions or concerns please feel free to contact our office.

Thank you.

Kimberly

From: David J. Adkins
Sent: Wednesday, February 28, 2018 11:52 AM
To: Yu, Olivia, EMNRD; Kimberly M. Wilson; Shelly Tucker
Cc: Mike Shoemaker
Subject: RE: Billiken 6 Federal #1 Work Plan

Acknowledged. Will do.
Thanks Olivia.

David J. Adkins
District Manager Artesia
Office: 575.746.8768
Direct: 575.616.4022
Cell: 575.441.4835
Fax: 575.746.8905
Emergency: 866.742.0742
Web: www.talonlpe.com



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, February 28, 2018 11:45 AM
To: David J. Adkins <dadkins@talonlpe.com>; Kimberly M. Wilson <kwilson@talonlpe.com>; Shelly Tucker <stucker@blm.gov>
Cc: Mike Shoemaker <mike.shoemaker@dvn.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

Mr. Adkins:

Please note more than 1 bottom confirmation sample is necessary. As written, the approved proposed remediation plan for 1RP-4761 proposed differing depths of excavation within the release area.

Thanks,
Olivia

From: David J. Adkins [<mailto:dadkins@talonlpe.com>]
Sent: Wednesday, February 28, 2018 11:09 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Kimberly M. Wilson <kwilson@talonlpe.com>; Shelly Tucker <stucker@blm.gov>
Cc: Mike Shoemaker <mike.shoemaker@dvn.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

Thank you Olivia.

We will confirm TPH and BTEX from the bottom and four side walls of the excavation.

David

David J. Adkins
District Manager Artesia
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, February 28, 2018 11:03 AM
To: David J. Adkins <dadkins@talonlpe.com>; Kimberly M. Wilson <kwilson@talonlpe.com>; Shelly Tucker <stucker@blm.gov>
Cc: Mike Shoemaker <mike.shoemaker@dvn.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

Mr. Adkins:

Acknowledged. All 20 samples were collected within a couple of hours, factoring in the 1.5 hour driving time from release location to Cardinal labs, which should have cooled the samples? 35°C is over 90°F. Please be advised that soil samples should be placed on ice as soon as collected, especially in the summer.

Olivia

From: David J. Adkins [<mailto:dadkins@talonlpe.com>]
Sent: Wednesday, February 28, 2018 10:25 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Kimberly M. Wilson <kwilson@talonlpe.com>; Shelly Tucker <stucker@blm.gov>
Cc: Mike Shoemaker <mike.shoemaker@dvn.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

Hi Olivia,

Initially I would have to say that is an acceptable compromise. We will run the analysis you

requested.

However, if I may clarify or provide a point of information please....

Those samples were collected and brought directly to the lab within a 4-hour window which is acceptable for laboratory QAQC (Celey at Cardinal will verify). The samples therefore did not have time to reach temperature and that is noted on the COC.

Respectfully,

David J. Adkins

District Manager Artesia

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

Sent: Wednesday, February 28, 2018 10:10 AM

To: Kimberly M. Wilson <kwilson@talonlpe.com>; Shelly Tucker <stucker@blm.gov>

Cc: Mike Shoemaker <mike.shoemaker@dmv.com>; David J. Adkins <dadkins@talonlpe.com>

Subject: RE: Billiken 6 Federal #1 Work Plan

Good morning Ms. Wilson:

Thank you for following-up on 1RP-4761. No; the request for TPH extended and BTEX analyses for the confirmation samples is not an oversight. Soil temperature of the samples submitted for laboratory analyses exceeded the permissible range. However, NMOCD will amend the number of requisite confirmation samples for BTEX and TPH extended laboratory analyses: one bottom and one confirmation sidewall sample from each of the 5 impacted areas.

Suitable compromise? Please confirm or inform for clarification.

Thanks,
Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]

Sent: Wednesday, February 28, 2018 9:39 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Shelly Tucker <stucker@blm.gov>

Cc: Mike Shoemaker <mike.shoemaker@dyn.com>; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: Billiken 6 Federal #1 Work Plan

Olivia,

In your stipulation below, you requested that TPH extended and BTEX be tested on the confirmation samples, why? Maybe an oversight? I've reattached the work plan for your ease of review, TPH and BTEX were not an issue at any sample location down to a depth of 4-feet deep.

Are you still requiring TPH and BTEX to be tested? Please respond at your earliest convenience, since I have an open excavation and would like to get permission to close.

Thank you in advance.

Kimberly

Kimberly M. Wilson
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, December 07, 2017 2:17 PM
To: Kimberly M. Wilson; Shelly Tucker
Cc: Mike Shoemaker; David Adkins
Subject: RE: Billiken 6 Federal #1 Work Plan

Ms. Wilson:

Please be advised that the soil conditions of the samples submitted for laboratory analyses were not suitable.

NMOCD will consider delineation completed for 1RP-4761 and approves of the proposed remediation with these stipulations.

- All confirmation bottom and sidewall samples must be tested for BTEX, TPH extended, and chlorides. Each different depth of excavation must have at least one set of confirmation bottom and sidewalls.
- If bottom samples exceed permissible levels of chlorides (600 mg/kg) at the proposed depths of excavation, proceed to the next foot. For sidewalls,

extend laterally the sides of the excavation.

- Include in the remediation report, an appropriately scaled map with these items: 1) the release area outlined; 2) the areas of differing excavation depths demarcated and annotated; and 3) confirmation sample locations marked with GPS coordinates.
- Dated photo documentation of the delineation and remedial activities. Provide captions.

Please confirm or inform for clarification. Like approval from BLM 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: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Friday, November 3, 2017 12:03 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Shelly Tucker <stucker@blm.gov>
Cc: Mike Shoemaker <mike.shoemaker@dvn.com>; David Adkins <dadkins@talonlpe.com>
Subject: Billiken 6 Federal #1 Work Plan

RE: Devon Energy * 30-025-42685 * DOR: 7-4-2017 * 1RP-4761

Good afternoon All,,

Attached please find the work plan for the above referenced location. If you have any questions or concerns please feel free to contact me.

Thank you.

Respectfully submitted,

Kimberly

Kimberly M. Wilson

Project Manager

NM Regulatory & Compliance Specialist

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