

From: Tucker, Shelly
To: [Yu, Olivia, EMNRD](#)
Cc: [McLaughlin, Joseph P](#); [Clay, Bryan W](#)
Subject: Re: [EXTERNAL]RE: CAP"s for ConocoPhillips Battle Axe 27 Federal 2H Well
Date: Thursday, March 22, 2018 6:24:21 AM

BLM concurs with NMOCD approval for the Battle Axe 27 Fed 2 ** 1RP-4903 & 1RP-4916.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Tue, Feb 27, 2018 at 8:45 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. McLaughlin:

NMOCD approves of the proposed delineation plan for 1RP-4903 and 1RP-4916. Please inform NMOCD of soil sampling witnessing opportunities at least 48 hours in advance.

Like approval from BLM required.

Thanks,

Olivia

From: McLaughlin, Joseph P [mailto:Joe.P.McLaughlin@conocophillips.com]

Sent: Friday, February 23, 2018 5:55 AM

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

Cc: Clay, Bryan W <Bryan.W.Clay@conocophillips.com>

Subject: RE: [EXTERNAL]RE: CAP's for ConocoPhillips Battle Axe 27 Federal 2H Well

Ms. Yu

Attached are the corrected CAP for the ConocoPhillips Battle Axe spills with your requirements added. Please review them for remediation and if you have any questions please let me know.

Thanks,

Joseph McLaughlin

Safety Specialist

ConocoPhillips

Work # 432-688-9062

W Cell # 806-567-2790

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, February 19, 2018 4:28 PM
To: McLaughlin, Joseph P <Joe.P.McLaughlin@conocophillips.com>; Tucker, Shelly <stucker@blm.gov>
Cc: Clay, Bryan W <Bryan.W.Clay@conocophillips.com>
Subject: RE: [EXTERNAL]RE: CAP's for ConocoPhillips Battle Axe 27 Federal 2H Well

Mr. McLaughlin:

Similar inconsistencies in this version of the proposed delineation for 1RP-4903 and 1RP-4916. Please refer to the below email dated January 29, 2018. To reiterate:

- All soil samples must be discrete.
- TPH analyses must include GRO, DRO, and MRO.
- The proposed 8 sample locations are adequate for the first pass. Please be advised that for delineation to be complete vertically, each delineation sample location must demonstrate 2 depths with permissible levels of BTEX, TPH extended, and chlorides in laboratory analyses. For example, if delineation is proposed to be conducted while excavating, samples from the bottom of the excavation and samples must be taken 2-3 ft. below the bottom of the excavation to confirm that the permissible levels were maintained.
- For complete horizontal delineation, sidewalls of the excavation must demonstrate permissible levels.

Please confirm or inform for clarification.

Thanks,

Olivia

From: McLaughlin, Joseph P [<mailto:Joe.P.McLaughlin@conocophillips.com>]
Sent: Monday, February 5, 2018 2:07 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Clay, Bryan W <Bryan.W.Clay@conocophillips.com>
Subject: RE: [EXTERNAL]RE: CAP's for ConocoPhillips Battle Axe 27 Federal 2H Well

Olivia,

Please review the attached CAP plans for the Battle Axe. Let me know if I need to modify it further or if it is okay to move forward.

Thank you,

Joseph McLaughlin

Safety Specialist

ConocoPhillips

Work # 432-688-9062

W Cell # 806-567-2790

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

Sent: Monday, January 29, 2018 12:02 PM

To: McLaughlin, Joseph P <Joe.P.McLaughlin@conocophillips.com>; Tucker, Shelly <stucker@blm.gov>

Subject: [EXTERNAL]RE: CAP's for ConocoPhillips Battle Axe 27 Federal 2H Well

Mr. McLaughlin:

The proposed delineation workplans for 1RP-4903 and 1RP-4916 are not approved. Given the size of the impacted area, likely more than five sample locations are required to characterize the releases. Please resubmit workplan with an appropriately scaled map, preferably aerial imagery, with the release areas outlined and delineation sample locations marked. One delineation workplan for 1RP-4903 and 1RP-4916 is acceptable.

1. Establish delineation sample locations in representative pooling locations in addition to the 4 cardinal directions.
2. Each sample location must demonstrate 2 depths of permissible levels of BTEX, TPH extended (GRO, DRO, and MRO), and chlorides: depth obtained and depth maintained at least 2-3 ft. further in depth. Laboratory analyses must be from discrete soil samples of these two depths for each sample location. Composites are not

- permitted.
3. Permissible chloride level is ≤ 600 mg/kg.

Please be advised that NMOCD considers delineating while conducting remedial activities to be conducted at risk. Also, NMOCD does not preclude the Responsible Operator from immediate corrective actions, such as cleanup of standing fluids or removal of visibly impacted soil.

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: McLaughlin, Joseph P [<mailto:Joe.P.McLaughlin@conocophillips.com>]
Sent: Wednesday, January 17, 2018 1:59 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Subject: CAP's for ConocoPhillips Battle Axe 27 Federal 2H Well

NMOCD & BLM,

Attached to this email are the Corrective Action Plans for the spills that occurred at the ConocoPhillips Battle Axe 27 Federal 2H location. (1RP-4903, 1RP-4916) Please review them and let me know if remediation is okay to start or if changes to the plan need to be made.

Thank you for your time,

Joseph McLaughlin

Safety Specialist

ConocoPhillips

Work # 432-688-9062

W Cell # 806-567-2790