

From: [Yu, Olivia, EMNRD](#)
To: ["Alan.Brandon@ghd.com"; stucker@blm.gov](#)
Cc: [Bernard.Bockisch@ghd.com](#); [zane_kurtz@eogresources.com](#); [filing@croworld.com](#)
Subject: RE: 1RP-4356 - Closure Request Rpt - 088210-30
Date: Monday, April 2, 2018 7:49:00 AM
Attachments: approved_closure_1RP4356_088210-30Yu-Tucker-Closure Request.pdf

Dear Mr. Kurtz:

Thank you for your patience.

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4356** closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Mr. Brandon- Thank you for your responses.

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: Alan.Brandon@ghd.com <Alan.Brandon@ghd.com>
Sent: Wednesday, March 21, 2018 9:05 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: Bernard.Bockisch@ghd.com; zane_kurtz@eogresources.com; filing@croworld.com
Subject: RE: 1RP-4356 - Closure Request Rpt - 088210-30

Olivia,

Please see the responses to your comments below.

Thanks

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, March 13, 2018 3:02 PM
To: Alan Brandon <Alan.Brandon@ghd.com>; stucker@blm.gov
Cc: Bernard Bockisch <Bernard.Bockisch@ghd.com>; zane_kurtz@eogresources.com; Filing-NA <filing@croworld.com>
Subject: RE: 1RP-4356 - Closure Request Rpt - 088210-30

Mr. Brandon:

Several comments regarding the closure report for 1RP-4356:

1. Is there reason why a confirmatory sample was not taken at the bottom of the excavation in the vicinity of S-088210-30-091916 SP-2? [Since the chloride concentration in S-088210-30-082316-SP-03 \(just to the south\) was 120 mg/kg at 12 ft. bgs, the vertical delineation in this area was assessed so the excavation was dug out to 4 ft. bgs, lined and backfilled.](#)
2. Page 3 indicated that the bottom of the excavation was 4 ft. bgs, but the 3 confirmation samples, taken on September 26, 2016, were at 6 ft. and 8 ft. bgs. Did the excavation proceed deeper at these locations, or were these samples taken from the base of the 4 ft. excavation? [These samples were collected from test pits to assess the vertical extent of chloride impacted soils in those areas. Base on the chloride concentrations in those samples, the vertical extent was assessed. Sample S-088210-30-081616-SP-02 contained a chloride concentration of 110 mg/kg at 14 ft. bgs that defined the vertical extent in the northeast corner of the excavation. Again, the excavation was extended to 4 ft. bgs throughout, lined and backfilled.](#)
3. Were the stockpiles used for backfilling? If not, what is the rationale behind testing the stockpiles in 2:1 and 3:1 ratio? [The intent was to determine if the stockpiled soils could be used for backfill, however the chloride concentrations exceeded the RRAL and was not used as backfill.](#)

Thanks,
Olivia

From: Brandon, Alan K. [<mailto:Alan.Brandon@ghd.com>]
Sent: Tuesday, February 28, 2017 11:56 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: Bockisch, Bernie <Bernard.Bockisch@ghd.com>; zane_kurtz@eogresources.com; Project Email Filing <Filing-NA@ghd.com>
Subject: 1RP-4356 - Closure Request Rpt - 088210-30

Olivia and Shelly,

GHD formally submits the attached Closure Request and supporting document for NMOCD 1RP-4356, EOG Resources Diamond 8 Fed Com No. 1. Included you will find the final C-141, completion photographs, and the previously submitted assessment report.

If you have any questions, please contact me or Bernie Bockisch.

GHD

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