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To: ["Wright, Justin K"](#)
Cc: [Oberding, Tomas, EMNRD](#)
Subject: Response to RPs discussed on 3/14/2017 meeting
Date: Friday, March 17, 2017 3:49:00 PM

Justin:

Responses to your questions about the 1RPs that we discussed during our meeting on 3/14/2017. Please confirm whether they address your concerns and inform what the next course of action is for each of these RPs.

1RP-4233: EVGSAU 3366-029

- NMOCD's position is that any release that occurred over an existing drilling pit, requires delineation and remediation. The status of a closed drilling pit is reopened.

1RP-4202: EVGSAY Injection header #4

- At Vertical 3, 6, 8, and 11: vertically delineate to 600 mg/kg chloride and maintained for 10 ft. below.
- Provide analytical laboratory analyses for at least two depths at these sample locations.
- All field chloride titration tests must be included. Any samples sent for laboratory analyses must have corresponding field data for correlation.

1RP-4263: MCA Battery 2

- Any sample sent for laboratory analyses (BTEX, TPH, chloride) must have corresponding field data. Provide all laboratory documentation.
- Establish 2 sample locations within the fenced area.
- Vertically delineate at all sample locations until permissible levels of Benzene, BTEX, TPH are obtained and maintained for 3 ft. below. At a minimum, send a midpoint and bottom confirmation samples for laboratory analysis.

1RP-4218: SEMU Permian 34

Historical

- Establish additional sample location in the asphaltine area. Somewhere center of Verticals 1, 2, 3.
- Vertical 1 & 3: obtain 50 mg/kg TPH and maintained for 3 ft. below. At a minimum, bottom and 1 other depth must have laboratory analyses.

Initial

- Complete vertical delineation is required at all 4 sample locations to 250 mg/kg chloride and maintained for an additional 10 ft. below. For BTEX and TPH, obtain permissible levels and maintained for 3 ft. below. Confirmation bottom samples must have laboratory analyses.
- Provide all field data and all laboratory data must have corresponding field data for correlation.

Thanks,

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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.