

From: Tucker, Shelly
To: [Mark Larson](#)
Cc: [Yu, Olivia, EMNRD](#); **Administrator:** bcunningham@legacylp.com; [Ashton Thielke](#)
Subject: Re: [EXTERNAL] FW: 1RP-4636 Hamon Tank Battery Delineation Plan
Date: Wednesday, April 18, 2018 2:55:02 PM
Attachments: image002.png

At some point in the near future...the old drill pit needs to be addressed. Looking at the site and past satellite images, the area is obviously not reclaiming. Don't panic, I am not going to ask you to excavate the pit and haul it off, but we do need to address the top 4'.

NOTE: LPC Timing Stipulations are in effect - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

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

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

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

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 a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they 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 Wed, Apr 18, 2018 at 2:46 PM, Tucker, Shelly <stucker@blm.gov> wrote:

Hamon Tank Battery ** 1RP-4636 H

BLM concurs with NMOCD approval and stipulations.

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On Wed, Apr 11, 2018 at 10:15 AM, Mark Larson <Mark@laenvironmental.com> wrote:

Dear Ms. Tucker,

Larson & Associates, Inc. (LAI), on behalf of Legacy Reserves Operating, LP (Legacy), has received approval from the New Mexico Oil Conservation Division (OCD) to proceed with delineations of a for a produced water spill at the Hamon Tank Battery (1RP-4636) in Lea County, New Mexico.. OCD specified that like approval is required from BLM. Your approval of the delineation plan is requested. Please feel free to contact Brian Cunningham with Legacy at (575) 391-1464 or bcunningham@legacy.com, me at (432) 687-0901 (office) or (432)-556-5818 (cell) or Mark Larson if you have any questions.

Respectfully,

Ashton Thielke

Staff Geologist

[507 N. Marienfeld St., Suite 205](#)

[Midland, Texas 79701](#)

[Office – 432-687-0901](#)

[Cell – 432-556-5818](#)

Fax – 432-687-0456

athielke@laenvironmental.com



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 09, 2018 10:51 AM
To: Sarah Johnson; stucker@blm.gov
Cc: bcunningham@legacylp.com; Mark Larson
Subject: RE: 1RP-4636 Hamon Tank Battery Delineation Plan

Good morning Ms. Johnson:

NMOCD approves of the proposed delineation plan for 1RP-4636 with the additional delineation locations as indicated below. Please remember to mark the release location on a scaled map in the next report.

Like approval from BLM required.

Thanks,

Olivia

From: Sarah Johnson [<mailto:SJohnson@laenvironmental.com>]
Sent: Tuesday, February 27, 2018 3:58 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: bcunningham@legacylp.com; Mark Larson <Mark@laenvironmental.com>
Subject: RE: 1RP-4636 Hamon Tank Battery Delineation Plan

Dear Ms. Yu,

Condition: Please address this concern regarding the proposed delineation plan for IRP-4636. The initial C-141 stated that the release area was around the separator. Please provide a rationale why all except one of the delineation sample locations are located in the pasture.

Response: The separator was located near the northwest corner of the pad and the majority of the liquid flowed northwest off the pad and pooled in the pasture. LAI has included a soil sample near the northwest corner of the pad in close proximity to the former separator. Legacy removed the separator following the incident and scraped visibly contaminated soil from the pad. LAI was called in to complete the delineation after Legacy rebuilt the tank battery. Equipment is now located over the area. LAI is proposing to collect soil samples at three (3) locations around the equipment where access is available for the direct push rig. LAI will also delineate the area where liquid pooled in the pasture northwest of the pad.

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: Tuesday, January 2, 2018 3:56 PM
To: Sarah Johnson; stucker@blm.gov
Cc: bcunningham@legacylp.com; Mark Larson
Subject: RE: 1RP-4636 Hamon Tank Battery Delineation Plan

Ms. Johnson:

Please address this concern regarding the proposed delineation plan for 1RP-4636. The initial C-141 stated that the release area was around the separator. Please provide a rationale why all except one of the delineation sample locations are located in the pasture.

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: Tuesday, December 26, 2017 9:41 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: bcunningham@legacylp.com; Mark Larson <Mark@laenvironmental.com>

Subject: 1RP-4636 Hamon Tank Battery Delineation Plan

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of Legacy Reserves Operating, LP (Legacy), submits the attached delineation plan for a produced water spill at the Hamon Tank

Battery (1RP-4636) in Lea County, New Mexico. Your approval of the delineation plan is requested. Please feel free to contact Brian Cunningham with Legacy at (575) 391-1464 or bcunningham@legacy.com, me at (432) 687-0901 (office) or (432) 664-5357 (cell) or Mark Larson if you have any questions.

Respectfully,

Sarah Johnson

Staff Geologist

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