

From: [Yu, Olivia, EMNRD](#)
To: ["Jennifer Knowlton"](#); [Price, Henryetta](#); [Sheldon Hitchcock](#)
Cc: [Dakota Neel](#); [Rebecca Haskell](#); [DeAnn Grant](#)
Subject: RE: [External] Re: Concho GC Federal #1 Work Plan *30-025-39266 * 1RP-4629
Date: Tuesday, April 24, 2018 12:56:00 PM
Attachments: image002.png
approved_1RP4629_2018.03.20 COG Work Plan GC Fed 31.pdf

Dear Ms. Knowlton:

Please address this concern regarding the report for 1RP-4629.

Why was the depth to groundwater assessed according to the Chevron Water Trend map? NMOCD strongly advise using other sources, such as NMOSE and USGS databases, in addition to the trend map and use the conservative depth. In fact, Figure 1 indicates NMOSE records with estimated depth to groundwater 51-100 ft. bgs.

Nonetheless, NMOCD will agree that delineation is complete for 1RP-4629 and the proposed remediation plan with the following modifications to be included in the remediation/closure report.

- On an appropriately scaled map, demarcate and annotate the borders of the areas represented by T1 and T3, where no remediation is necessary, and the area represented by T-2, necessitating 3 ft. removal.
- Confirmatory laboratory analyses of chlorides are required for the bottom and sidewalls of the area represented by T-2.
- Confirmation bottom/edge sample at the area represented by West sample location at 0.5 ft bgs is required to complete horizontal characterization of the release. Please be advised that lateral extension of the West confirmation sample location may be required.
- Tabulate GPS coordinates of sample locations.
- Dated, optimally geo-referenced, photo documentation of delineation/remediation activities.

Please confirm or inform for clarifications.

Thanks,
Olivia

From: Jennifer Knowlton <jknowlton@hrlcomp.com>
Sent: Monday, April 2, 2018 8:19 AM
To: Price, Henryetta <hprice@blm.gov>; Sheldon Hitchcock <SLHitchcock@concho.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrant@concho.com>
Subject: RE: [External] Re: Concho GC Federal #1 Work Plan *30-025-39266 * 1RP-4629

I apologize. I put this together on Friday and just spaced hitting send.


Ms. Yu/Ms. Price,

Attached is the Work Plan for the GC Federal #31 with the clarifications that Ms. Price requested. If

you have any additional questions, please feel free to contact me.

Jennifer Knowlton, PE | Regional Manager Permian Basin
HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 505-238-3588

[Web](#) | [vCard](#) | [Map](#) |  | 



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From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Thursday, March 29, 2018 3:58 PM
To: Sheldon Hitchcock <SLHitchcock@concho.com>
Cc: Jennifer Knowlton <jknowlton@hrlcomp.com>; Olivia.Yu@state.nm.us; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrnt@concho.com>; Maurice Foye <mfoye@hrlcomp.com>; Herman Lucero <hlucero@hrlcomp.com>
Subject: Re: [External] Re: Concho GC Federal #1 Work Plan *30-025-39266 * 1RP-4629

One more email...

In Paragraph 4.0.. It states that confirmation samples will be collected at the bottom of the excavation and sidewalls of the "West" sample site.

I don't think sidewall samples for "West" sample are absolutely necessary but samples for the sidewalls of the excavation will be needed. I just needed clarification due to the wording of the work plan.

Please resubmit work plan with corrections and ensure closure report is also accurate. Thank you.

Henryetta Price
Environmental Protection Specialist
Bureau Of Land Management
Hprice@blm.gov
Phone 575-234-5951
Cell 575-706-2780
Fax 575-234-5927

*** Lesser Prairie Chicken (LPC) timing stipulations are in effect 1 Mar- 15 June annually.

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 Thu, Mar 29, 2018 at 3:12 PM, Sheldon Hitchcock <SLHitchcock@concho.com> wrote:

The well

Sheldon L. Hitchcock
HSE Coordinator
COG Operating LLC
[2407 Pecos Avenue | Artesia, NM 88210](#)
Cell: 575-703-6475 | Office: 575-746-2010
slhitchcock@concho.com



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From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Thursday, March 29, 2018 3:06 PM
To: Sheldon Hitchcock
Cc: Jennifer Knowlton; Olivia.Yu@state.nm.us; Dakota Neel; Rebecca Haskell; DeAnn Grant; Maurice Foye; Herman Lucero
Subject: Re: [External] Re: Concho GC Federal #1 Work Plan *30-025-39266 * 1RP-4629

Woops!!

So, the Coverpage states that the work plan is for the Battery... is this for the battery or for the well???

Henryetta Price
Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

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Cell 575-706-2780

Fax 575-234-5927

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On Wed, Mar 21, 2018 at 10:31 AM, Price, Henryetta <hprice@blm.gov> wrote:
Thank you for the prompt response.

Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

Hprice@blm.gov

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

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On Wed, Mar 21, 2018 at 10:22 AM, Sheldon Hitchcock <SLHitchcock@concho.com> wrote:
Henryetta,

In reference to your question. A previous contractor of ours was given this project to complete. There slow turnaround is why they no longer have this project. I apologize for the delays.

Sheldon L. Hitchcock

HSE Coordinator

COG Operating LLC

[2407 Pecos Avenue | Artesia, NM 88210](https://www.concho.com)

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slhitchcock@concho.com



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From: Price, Henryetta [mailto:hprice@blm.gov]
Sent: Wednesday, March 21, 2018 10:08 AM
To: Jennifer Knowlton
Cc: Olivia.Yu@state.nm.us; Sheldon Hitchcock; Dakota Neel; Rebecca Haskell; DeAnn Grant; Maurice Foye; Herman Lucero
Subject: [External] Re: Concho GC Federal #1 Work Plan *30-025-39266 * 1RP-4629

**** External email. Use caution. ****

Good Morning Jennifer,

BLM accepts and approves the work plan. Must have like approval from NMOCD and adhere to any additional stipulations from NMOCD.

I also have one question... Why is a work plan submitted almost a year after the data was collected?

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

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*** Lesser Prairie Chicken (LPC) timing stipulations are in effect 1 Mar- 15 June annually.

On Wed, Mar 21, 2018 at 9:37 AM, Jennifer Knowlton <jknowlton@hrlcomp.com> wrote:
Ms. Yu/Ms. Price,

On behalf of COG Operating, I have attached a work plan for the GC Federal #31 for your consideration. Please feel free to contact me if you have any other questions.

Jennifer Knowlton, PE | Regional Manager Permian Basin
HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 505-238-3588

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