

From: Price, Henryetta
To: [Gonzales, Clair](#)
Cc: [Mann, Ryan](#); [Naranjo, Mark](#); [Tavarez, Ike](#); [Rebecca Haskell](#); [Sheldon Hitchcock](#); [DeAnn Grant](#); [Dakota Neel](#); [Yu, Olivia, EMNRD](#)
Subject: Re: [EXTERNAL] RE: COG - Federal 19#1 Work Plan Approval Request (1RP-4712)
Date: Tuesday, May 1, 2018 2:54:05 PM

Clair,

BLM accepts and approves the proposed work plan.

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.

*** Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

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, May 1, 2018 at 2:24 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Ms. Gonzales:

As a reminder, please be advised that standard soil sampling procedures should be followed for every sampling event. Samples for chloride analyses only should be treated as samples collected for BTEX and TPH analyses. In other words, soil temperatures of samples must be maintained between 0-6°C.

NMOCD approves of the delineation completed for 1RP-4712 with the following stipulations for the proposed remediation plan:

1. Soil blending is not permitted due to the elevated chloride levels indicated in 0-4 ft. for the area represented by T-1/BH-1 and 0-1 ft. for T-2 and T-3 areas.
2. Bottom and sidewall confirmation samples are required for the proposed 1-2 ft. excavation for T-2/T-3 areas.
3. Confirmation sidewalls are required for the area represented by T-1/BH-1. At least one confirmation edge sample must be at the border between T1 and T2/T3 areas. Excavate to 4 ft. bgs before a minimum 20 mil properly keyed liner is emplaced.
4. Please annotate the actual depths of excavation for each area on a scaled map and in tabular format.
5. Tabulate GPS coordinates of confirmation sample locations.
6. Photo documentation is required for verification of release area. Aerial imagery appears to indicate that the impacted area was greater.

Please confirm or inform for clarification.

Like approval from NMSLO and BLM required. Corresponding agencies may have additional concerns and stipulations.

Thanks,

Olivia

From: Gonzales, Clair <Clair.Gonzales@tetrattech.com>

Sent: Monday, April 9, 2018 2:26 PM

To: Mann, Ryan <rmann@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Naranjo, Mark <MNaranjo@slo.state.nm.us>

Cc: Tavarez, Ike <Ike.Tavarez@tetrattech.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrants@concho.com>; Dakota Neel <DNeel2@concho.com>

Subject: RE: COG - Federal 19#1 Work Plan Approval Request (1RP-4712)

Mr. Mann,

As stated in the work plan to address this concern, the removed soil will be

segregated into 50 cubic yard stockpiled and sampled for chlorides. If the laboratory results show the chloride concentrations exceed 600 mg/kg, the soil will not be used for backfilling purposes and will be hauled for proper disposal. However, if the laboratory results show concentrations below 600 mg/kg, the stockpiled material will be used as backfill. Let me know if you have any other questions or concerns.

Thank you,

Clair Gonzales

Clair Gonzales | Project Manager

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946

clair.gonzales@tetrattech.com

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From: Mann, Ryan [<mailto:rmann@slo.state.nm.us>]
Sent: Friday, April 06, 2018 2:15 PM
To: Gonzales, Clair <Clair.Gonzales@tetrattech.com>; 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Tavarez, Ike <Ike.Tavarez@tetrattech.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>; Dakota Neel <DNeel2@concho.com>
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Ms. Gonzalez

BH-1/T-1 are located in close proximity to each other yet their chloride levels vary by more than a factor of 10. I am concerned that the soil is more contaminated than what the BH1 data indicates and that this soil will not be suitable to backfill with. Can you please explain this in a little more detail you rationale for this?

From: Gonzales, Clair [<mailto:Clair.Gonzales@tetrattech.com>]
Sent: Thursday, April 5, 2018 10:48 AM
To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Naranjo, Mark <MNaranjo@slo.state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: Tavarez, Ike <Ike.Tavarez@tetrattech.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrants@concho.com>; Dakota Neel <DNeel2@concho.com>
Subject: COG - Federal 19#1 Work Plan Approval Request (1RP-4712)

Good Morning,

Attached is the work plan for the above referenced site located in Lea County, New Mexico. Once approved, COG will implement the proposed work plan. Let me know if you have any questions or concerns.

Thank you

Clair Gonzales

Clair Gonzales | Project Manager

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946
clair.gonzales@tetrattech.com

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