From: Groves, Amber

To: <u>Yu. Olivia, EMNRD; Amanda Taylor</u>

Subject: RE: SWD 142/LG-3345

Date: Wednesday, October 25, 2017 5:06:00 PM
Attachments: image003.png

image003.png image005.png image006.png image001.png

Amanda,

What is the status of the work plan submittal? I am in need of an update as the last communication that I have is the below e-mail sent on 7/21/2017.

Thank you,

Amber Groves

Remediation Specialist Field Operations Division (575)392-3697 (575)263-3209 cell New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88240

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From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Friday, July 21, 2017 8:04 AM

To: Amanda Taylor <taylortaylor16@aol.com> **Cc:** Groves, Amber <agroves@slo.state.nm.us>

Subject: RE: SWD 142/LG-3345

Good morning Amanda:

The below information should provide some guidance. At a minimum, please include these items to facilitate review of the delineation/corrective action plan:

- 1. Scaled, preferably digital, map of the site with location of release, locations of proposed or actual sample points, and dimensions of the release demarcated. You can either mark on the map or provide a table on a subsequent page of sample points and respective GPS coordinates.
- 2. Documentation of depth to groundwater search. Go to http://nmwrrs.ose.state.nm.us/nmwrrs/waterColumn.html
 - Use the UTM NAD83 radius search with a radius of 2000 m and 5000 m.
 - To get GPS coordinates in latitude/longitude degrees into UTM coordinates, use the UTM converter (http://nmwrrs.ose.state.nm.us/nmwrrs/utmLocTool.html)
 - Output the report in pdf format.
 - Check the Chevron Trend Map for Lea County and/or USGS database.
 - Use the conservative value from all sources to determine average water table depth.
- 3. Check on a topographical map and report distance to surface water body and water source.
- 4. Tabulate any preliminary field and laboratory data for Benzene, BTEX, TPH, and chlorides with sample IDs and depth of samples. Provide the laboratory documentation and chain of command at the back or in an appendix.
- 5. Georeferenced photos in tiff, jpg, jpeg etc. format, if available. Provide photos that were taken of the release area and cleanup/delineation activities. Photos for the remediation plan ideally would be taken at the same

spots/direction as the delineation stage.

- 6. Attach a copy of the reviewed initial C141.
- 7. Any releases on State leases (such as this one) will need to have a revegetation plan. Like approval from Amber Groves (State Land Office) will be required.

Let me know if you have questions.

Olivia

From: Amanda Taylor [mailto:taylortaylor16@aol.com]

Sent: Monday, July 17, 2017 12:06 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Subject: Re: SWD 142/LG-3345

Good afternoon,

Could you please call me at your earliest convenience? I think I have everything ready to send over, I just have a few questions. Thank you and have a great day!

Amanda Taylor

Smith & Marrs, Inc. PO Box 863 Kermit,Tx 79745 432-586-3076 Cell# 432-940-4948

taylortaylor16@aol.com

----Original Message-----

From: Yu, Olivia, EMNRD, EMNRD < Olivia. Yu@state.nm.us>

To: Amanda Taylor taylor16@aol.com; agroves agroves@slo.state.nm.us>

Cc: seay04 < seay04@leaco.net> Sent: Tue, Jun 27, 2017 11:40 am Subject: RE: SWD 142/LG-3345

Good morning Ms. Taylor:

Mr. Seay met with Amber Groves and I this morning about the delineation process thus far for 1RP-4647. In order for a full assessment and subsequent steps, please send the laboratory analyses in an electronic format as well as the other corrective action requirements, such as documentation of depth to groundwater using the NMOSE database or distance to surface waterbodies and water sources. If you have questions/require clarification about what to include in a report, please contact me.

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: Yu, Olivia, EMNRD

Sent: Tuesday, March 21, 2017 4:56 PM

To: 'Amanda Taylor' < taylortaylor16@aol.com >; agroves@slo.state.nm.us

Subject: RE: SWD 142/LG-3345

Dear Ms. Taylor:

The RP for this incident is

			Smith &	Sanmal Queen Unit		
4647	3/21/2017	А	Marrs	battery	17S-33E-1I	3/21/2017

Please note that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Also, what is the status of 1RP-2330 that occurred on the same location in October 20, 2009?

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

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From: Amanda Taylor [mailto:taylortaylor16@aol.com]

Sent: Wednesday, March 15, 2017 3:05 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; agroves@slo.state.nm.us

Cc: Oberding, Tomas, EMNRD < <u>Tomas.Oberding@state.nm.us</u>>; <u>agroves@slo.state.nm.us</u>

Subject: Re: SWD 142/LG-3345

Here is the c141 on the Sanmal Queen Unit LG3345. Please let me know if you need anything more as of now from myself.

Have a great day!

Amanda Taylor

Smith & Marrs, Inc. P.O. Box 863 Kermit, TX 79745

Office: 432-586-3076 Cell: 432-940-4948 taylortaylor16@aol.com

-----Original Message-----

From: Yu, Olivia, EMNRD, EMNRD < Olivia. Yu@state.nm.us>

To: Amanda Taylor < taylortaylor16@aol.com>

Cc: Oberding, Tomas, EMNRD, EMNRD Longstate.nm.us; Groves, Amber Amproves@slo.state.nm.us;

Sent: Thu, Feb 23, 2017 11:04 am Subject: RE: SWD 142/LG-3345 Ms. Taylor:

NMOCD and NMSLO require an update on the issues addressed below. Please provide the requested information ASAP.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

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From: Oberding, Tomas, EMNRD

Sent: Thursday, January 19, 2017 11:46 AM

To: Groves, Amber <agroves@slo.state.nm.us>; Amanda Taylor <taylortaylor16@aol.com>

Cc: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Subject: RE: SWD 142/LG-3345

The OCD would like to confirm that we have no data regarding the site outside of the 2009 C-141.

This site appears out of compliance and a letter of non-compliance may be drafted as the spills evident in the photos appear-

Over 25bbls

Older than 14 days

Please provide an appropriate C-141 to account for the new spills on site by Monday 1/23/2017.

A complete update as to all remedial activities regarding the 2009 (1RP-2330) spill is also required within 14 days.

-Dr. Oberding

Tomáš 'Doc' Oberding PhD Hydrologist, Adv-District 1 Oil Conservation Division, EMNRD (505) 476-3403

E-Mail: tomas.oberding@state.nm.us

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From: Groves, Amber [mailto:agroves@slo.state.nm.us]

Sent: Thursday, January 19, 2017 9:43 AM **To:** Amanda Taylor taylortaylor16@aol.com>

Cc: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; Oberding, Tomas, EMNRD < Tomas. Oberding@state.nm.us >

Subject: RE: SWD 142/LG-3345

From: Amanda Taylor [mailto:taylortaylor16@aol.com]
Sent: Thursday, January 19, 2017 9:17 AM
To: Groves, Amber <agroves@slo.state.nm.us>

Cc: Olivia.Yu@state.nm.us; Tomas.Oberding@state.nm.us

Subject: Re: SWD 142/LG-3345

Let me talk to the field and my supervisor and I will get back to you on this issue. Is there anyway you can send me the pictures in quested to send over to my supervisor?

Thanks

Amanda Taylor

Smith & Marrs, Inc. P.O. Box 863 **Kermit, TX 79745**

Office: 432-586-3076 Cell: 432-940-4948 taylortaylor16@aol.com

----Original Message-----

From: Groves, Amber <agraves@slo.state.nm.us> To: taylortaylor16 < taylortaylor16@aol.com >

Cc: Yu, Olivia, EMNRD, EMNRD < Olivia, Yu@state.nm.us>; Oberding, Tomas, EMNRD, EMNRD

< Tomas. Oberding@state.nm.us> Sent: Thu, Jan 19, 2017 10:08 am Subject: RE: SWD 142/LG-3345

Amanda,

I have been reviewing photographs from my lease inspection and there is also a large spoil pile located on the well pad of Unit #4. I would like to know what the circumstances are behind that and how long it has been there.

Thank you,



Amber Groves

Remediation Specialist Field Operations Division (575)392-3697 (575)263-3209 cell New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88260

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To: 'taylortaylor16@aol.com' <taylortaylor16@aol.com>

Cc: 'Yu, Olivia, EMNRD' < Olivia. Yu@state.nm.us > ; 'Oberding, Tomas, EMNRD' < Tomas. Oberding@state.nm.us > Subject: FW: SWD 142/LG-3345

Amanda,

I have a few issues associated with the above listed leases that I would like addressed. The Sanmal Queen Unit tank battery appears to have had numerous releases. There are two historical releases to the south of the perimeter fencing that appear to have come from flow lines. There is a rather large, visibly contaminated spoil pile in the middle of the location that looks as if it has been there for many months with no liner. There is also an open, visibly still impacted excavation on location as well as the tank battery facility being completely full of hydrocarbons and produced water. What we will need for this location is a C-141 submitted to myself as well as Olivia Yu and Tomas Oberding with NMOCD. This site will need to be fully delineated as in all historic impacts, onsite excavation, underneath the spoil pile and within the battery berms. A work plan should follow once the site has been fully delineated. I have copied Olivia and Dr. Oberding on this e-mail for your convenience.

In addition, there is an open RP for this facility that does not seem to have any paperwork beyond the C-141 that needs to be followed up on. It is 1RP-2330. It has been open since 2009, so please advise on the remediation status.

Thank you and feel free to give me a call with any questions or if you would like to set up an onsite meeting.



Amber Groves

Remediation Specialist Field Operations Division (575)392-3697 (575)263-3209 cell New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88260

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From: Yu, Olivia, EMNRD
To: "Rickey Smith"

Cc: agroves@slo.state.nm.us; Ernest Padilla; Billings, Bradford, EMNRD

Subject: RE: San Mal unit

Date: Wednesday, July 12, 2017 2:37:00 PM

Attachments: 1RP4647.pdf

Mr. Smith:

The guidelines for BTEX and TPH are detailed in this document: http://www.emnrd.state.nm.us/OCD/documents/7C spill1.pdf

Permissible chloride levels for delineation is determined on a site-by-site basis, using the same ranking criteria as in the 1992 guidelines for BTEX and TPH. Remediation plans are determined after the completion of the delineation stage. Please be advised that permissible chloride levels for delineation are partially dependent on average depth to groundwater using a number of sources, including NMOSE and USGS databases and the Chevron water trend map. Nonetheless, conventionally, remediation of a site would involve 4 ft. excavation of the release area and a properly set minimal 20 mil liner. Bottom and sidewall confirmation samples are required.

During a June 27, 2017 meeting with NMOCD and NMSLO in Hobbs, Mr. Eddie Seay presented one paper copy of laboratory results from March 6, March 28, and May 23, and photos of the Sanmal release site. However, NMOCD and NMSLO both require electronic copies for review and documentation of the corrective actions completed for 1RP-4647. Please submit electronic versions of these documents along with the requested information detailed in conditions of approval attached to the reviewed initial C-141. This is reattached for your convenience.

Thanks, Olivia

From: Rickey Smith [mailto:rickeylynnsmith@gmail.com]

Sent: Wednesday, July 12, 2017 1:39 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Cc: agroves@slo.state.nm.us; Ernest Padilla <epadillaplf@qwestoffice.net>; Billings, Bradford,

EMNRD < Bradford. Billings@state.nm.us>

Subject: Re: San Mal unit

We will attempt to clean later as money is gathered up - could you send me the criteria on the NMOCD ranking score for these spills - In going thru what files we have Yates had used a Ranking Score of 0 - I am not familiar with this scoring - Yates also used a water depth of greater than 100' and no surface wells or water within 1000" - It would help us to determine the extent of cleanup still required -

what documents do you still need as some have been sent in - New tests results?

On Wed, Jul 12, 2017 at 1:28 PM, Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us > wrote:

Dear Mr. Smith:

Please be advised that NMOCD will not grant backfill approval unless releases are characterized and remediated according to a NMOCD and NMSLO approved plan. Please send documents pertinent to 1RP-4647 as soon as possible.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

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From: Rickey Smith [mailto:<u>rickeylynnsmith@gmail.com</u>]

Sent: Wednesday, July 5, 2017 9:31 AM

To: agroves@slo.state.nm.us; Yu, Olivia, EMNRD < Olivia.Yu@state.nm.us>

Cc: Ernest Padilla < epadillaplf@qwestoffice.net >

Subject: San Mal unit

I have attached the following letter.

I appreciate your patience on this issue as we struggle thru the issues on the San Mal

Rickey Smith

From: Yu, Olivia, EMNRD

To: "Amanda Taylor"; "agroves@slo.state.nm.us"

 Cc:
 "seay04@leaco.net"

 Subject:
 RE: SWD 142/LG-3345

Date: Tuesday, June 27, 2017 10:40:00 AM

Attachments: image001.png image002.png

Good morning Ms. Taylor:

Mr. Seay met with Amber Groves and I this morning about the delineation process thus far for 1RP-4647. In order for a full assessment and subsequent steps, please send the laboratory analyses in an electronic format as well as the other corrective action requirements, such as documentation of depth to groundwater using the NMOSE database or distance to surface waterbodies and water sources. If you have questions/require clarification about what to include in a report, please contact me.

Thanks,

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			Smith &	Sanmal Queen Unit		
4647	3/21/2017	А	Marrs	battery	17S-33E-1I	3/21/2017

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Cc: Oberding, Tomas, EMNRD < Tomas. Oberding@state.nm.us >; agroves@slo.state.nm.us

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Have a great day!

Amanda Taylor

Smith & Marrs, Inc. P.O. Box 863 Kermit, TX 79745

Office: 432-586-3076 Cell: 432-940-4948 taylortaylor16@aol.com

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To: Amanda Taylor < taylortaylor16@aol.com >

Cc: Oberding, Tomas, EMNRD, EMNRD Tomas.Oberding@state.nm.us; Groves, Amber agroves@slo.state.nm.us

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Tomáš 'Doc' Oberding PhD Hydrologist, Adv-District 1 Oil Conservation Division, EMNRD (505) 476-3403

E-Mail: tomas.oberding@state.nm.us

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Amber Groves

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