

From: [Yu, Olivia, EMNRD](#)
To: [Andrew Parker](#); [Mann, Ryan](#)
Cc: [Billings, Bradford, EMNRD](#); mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; [Randall Hicks](#)
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625
Date: Friday, July 20, 2018 10:04:00 AM

Good morning Mr. Parker:

Postponement of remediation for the release assigned 1RP-4625 is DENIED. This release occurred in early-mid January 2017 with months of unnecessary delay in addressing the impacted area, especially unjustified as the release occurred adjacent to a playa, which is a waterbody of New Mexico.

The release area around the tank battery, represented by NW berm data, and well pad, represented by TT-1 July 2017 data, will need additional vertical delineation.

NMSLO may have additional concerns.

Thanks,
Olivia

From: Andrew Parker <andrew@rthicksconsult.com>
Sent: Tuesday, June 26, 2018 5:21 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; Randall Hicks <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Ms. Yu:

Attached is the characterization and remediation plan for Pride Energy's NM 87 State 001 (Tank Battery) release. Please note that we ask NMOCD for a temporary deferment to the proposed restoration and remediation plan. The purpose of the request is to postpone remediation/restoration design until the final ruling of NMOCD's proposed application to repeal and replace Rule 19.15.29 NMAC (the Rule). The final ruling is expected to be delivered by the first week of August 2018.

Thank you,

Andrew Parker
R.T. Hicks Consultants
Durango Field Office
970-570-9535

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:51 PM
To: Olivia.yu@state.nm.us
Cc: bradford.billings@state.nm.us; mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Please consider this the 48-hour advanced notice to perform characterization as outlined in our March 28, 2018 report submitted to Pride Energy with a copy to NMOCD. We plan to arrive at the wellhead location late afternoon on April 2, 2018, after completion of characterization at the tank battery location. We welcome NMOCD to observe the characterization and we are prepared to answer any questions NMOCD may have. Any person on-site will be required to have steel toe boots, ear protection, and hardhat as PPE.

Andrew Parker
R.T. Hicks Consultants
Durango Field Office
970-570-9535

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:29 PM
To: mattp@pride-energy.com; taylorp@pride-energy.com
Cc: bradford.billings@state.nm.us; mnaranjo@slo.state.nm.us; Olivia.yu@state.nm.us
Subject: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Mr. Pride:

Attached are the results of the first characterization plan and the proposed activities for the second characterization. Please note that NMAC 19.15.29 does not require NMOCD approval of characterization plans. After reviewing second characterization results, we will determine the best approach on whether to

1. Perform corrective actions under the current regulation, or
2. Ask for a variance using the proposed cleanup criteria levels as a guidance as discussed in the attached plan.

We plan on performing the second characterization on the afternoon of April 2, 2018. A notice to NMOCD will follow this email.

Per NMAC 19.15.29, the next formal submission to NMOCD is either a remediation (correction action) or closure plan – at which time NMOCD can either deny or approval the plan. The type of submission and path forward will be based on data collected during the characterization using standards and regulations in-place at the time. A formal variance may be requested at the time of formal submission to NMOCD.

Andrew Parker
R.T. Hicks Consultants
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970-570-9535