

**From:** Yu, Olivia, EMNRD  
**To:** Sheldon Hitchcock; Hernandez, Christina, EMNRD; [stucker@blm.gov](mailto:stucker@blm.gov); Price, Henryetta  
**Cc:** Robert McNeill; Rebecca Haskell; Dakota Neel; DeAnn Grant; Ike Tavarez; Billings, Bradford, EMNRD  
**Subject:** RE: (Deferral Request) MC Federal #014 (30-025-38738) 11-19-2017  
**Date:** Friday, July 27, 2018 10:52:00 AM

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Mr. Hitchcock:

Data from the 2 geoprobe locations are accepted for horizontal delineation of impact. However, continuation of vertical delineation should have been completed, especially at AH-2 and AH-4 sample locations. Deferral for remedial activities is not granted for 1RP-5131 until Benzene, BTEX, and TPH extended plumes are defined with depth to groundwater at approximately 80 ft. bgs.

Thanks,  
Olivia

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**From:** Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>  
**Sent:** Friday, July 27, 2018 9:56 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>; [stucker@blm.gov](mailto:stucker@blm.gov); Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)>  
**Cc:** Robert McNeill <[RMcNeill@concho.com](mailto:RMcNeill@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>; Ike Tavarez <[itavarez@concho.com](mailto:itavarez@concho.com)>  
**Subject:** RE: (Deferral Request) MC Federal #014 (30-025-38738) 11-19-2017

Ms. Yu,

Just to be clear the issues with the liner stem from the liner being cut in the past when someone was accessing the man-ways on the 4 oil tanks. We used a hand auger to sample in the 4 liner holes behind the tanks. We were able to hand auger to a depth of 3-4 feet on each hole (see "AH" sample locations on the site diagram). We still had elevated TPH & BTEX numbers at 4-feet BGS. We mobilized a geoprobe to guarantee we achieved vertical delineation. We got as close as we could to the area(s) of concern behind the tanks however the samples came back clean at 4-feet BGS. Essentially the soil impacts are localized to the small areas behind each oil tank. Due to the infrastructure there is no way to collect any more samples that will give a clearer image of the release than what we already have. We should be able to take the first foot or so of soil from the liner holes without jeopardizing the stability of the tanks. This will eliminate our chloride issues. As I proposed in the deferral report, we will backfill with bentonite which will (in conjunction with the battery liner) encapsulate the remaining impacts until the site is abandoned and fully remediated. We can also add a bioremediation agent such as Micro-Blaze to treat the hydrocarbons if you wish. However it will be in an anaerobic environment so I doubt it will gain us much. Please let me know your thoughts on moving forward with the deferral.

Thank you,

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](mailto:slhitchcock@concho.com)



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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, July 20, 2018 4:05 PM  
**To:** Sheldon Hitchcock; Hernandez, Christina, EMNRD; [stucker@blm.gov](mailto:stucker@blm.gov); Price, Henryetta  
**Cc:** Robert McNeill; Rebecca Haskell; Dakota Neel; DeAnn Grant  
**Subject:** [External] RE: (Deferral Request) MC Federal #014 (30-025-38738) 11-19-2017

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

Mr. Hitchcock:

As this incident requires remediation, a **1RP-5131** is issued. Please see attachment for your records.

|             |           |   |     |                |              |             |            |
|-------------|-----------|---|-----|----------------|--------------|-------------|------------|
| <b>5131</b> | 7/20/2018 | A | COG | MC Federal #14 | 30-025-38738 | 17S-32E-21B | 11/19/2017 |
|-------------|-----------|---|-----|----------------|--------------|-------------|------------|

Please clarify. Were the delineation sample data collected under the liner? In other words, the maximum depth of sample was collected 4 ft. bgs with a geoprobe?

NMOCD would consider a deferral on further remediation after submission of preliminary bottom and sidewall samples of the maximum depth and extent obtainable for the proposed excavation at this facility. Please provide photo documentation of the remedial process.

Thanks,  
Olivia

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**From:** Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>

**Sent:** Wednesday, June 27, 2018 10:39 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>; [stucker@blm.gov](mailto:stucker@blm.gov); Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)>

**Cc:** Robert McNeill <[RMcNeill@concho.com](mailto:RMcNeill@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>

**Subject:** (Deferral Request) MC Federal #014 (30-025-38738) 11-19-2017

Ms. Yu/Ms. Tucker,

Please find the attached Deferral Request Letter for the MC Federal #014. If you have any questions or concerns please do not hesitate to contact me.

Thank you,

Sheldon L. Hitchcock  
HSE Coordinator  
COG Operating LLC  
2407 Pecos Avenue | Artesia, NM 88210  
Cell: 575-703-6475 | Office: 575-746-2010  
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