

From: [Hernandez, Christina, EMNRD](#)
To: ["Gonzales, Clair"](#)
Cc: [Rebecca Haskell](#); [Dakota Neel](#); ["Sheldon Hitchcock"](#); [Carmona, Mike](#); [Ike Tavarez \(itavarez@concho.com\)](#)
Subject: RE: COG- MC Federal #3 (1RP-4793)
Date: Tuesday, August 21, 2018 9:05:00 AM
Attachments: [Approved WorkPlan1RP-4793.pdf](#)

Dear Ms. Gonzales:

NMOCD approves of the delineation completed and proposed remediation for 1RP-4793. Please note that the new regulation NMAC 19.11.29 went into effect on August 14, 2018. Please be advised to read and understand remediation and closure requirements per NMAC 19.11.29 available at: <http://164.64.110.134/parts/title19/19.015.0029.html>

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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: Gonzales, Clair <Clair.Gonzales@tetrattech.com>
Sent: Friday, August 17, 2018 10:35 AM
To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: Rebecca Haskell <RHaskell@concho.com>; Dakota Neel <DNeel2@concho.com>; 'Sheldon Hitchcock' <SLHitchcock@concho.com>; Carmona, Mike <Mike.Carmona@tetrattech.com>; Ike Tavarez (itavarez@concho.com) <itavarez@concho.com>
Subject: RE: COG- MC Federal #3 (1RP-4793)

Christina,

As requested, Tetra Tech returned to the site on August 2nd, 2018 to collect additional samples for chloride analysis. The updated analysis table is attached for reference. Referring to the table, the area of auger hole (AH-1) showed a shallow chloride impact with concentrations of 1,900 mg/kg (0-1') and 1,760 mg/kg (1-1.5'), before

declining to below 600 mg/kg at 2'-2.5' below surface. The areas of auger holes (AH-2 and AH-3) did not show elevated chloride concentrations to the soils. COG will proceed with the work plan as proposed and will address the shallow chloride impact in the area of auger hole (AH-1). Due to the active equipment and access issues, the areas will be excavated to the maximum extent practicable.

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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901 West Wall Street, Ste 100 | Midland, TX 79701 | www.tetrattech.com

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From: Tavaréz, Ike

Sent: Friday, July 13, 2018 11:17 AM

To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Cc: Rebecca Haskell <RHaskell@concho.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>;

Dakota Neel <DNeel2@concho.com>; 'Sheldon Hitchcock' <SLHitchcock@concho.com>; Carmona, Mike <Mike.Carmona@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Christina,

Sounds good. As discussed, even if we have a chloride issue, we are still limited on the depth due to access and safety concerns. I would like to setup a meeting with you and Olivia to discuss some of the spill protocols and requirements to move forward on projects. Let me know when you are available to meet, thanks

Ike Tavaréz, PG | Senior Project Manager

Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavaréz@tetrattech.com

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4000 North Big Spring, Suite 401 | Midland, TX 79705 | www.tetrattech.com

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From: Hernandez, Christina, EMNRD [<mailto:Christina.Hernandez@state.nm.us>]

Sent: Friday, July 13, 2018 9:50 AM

To: Tavaréz, Ike <Ike.Tavaréz@tetrattech.com>

Cc: Rebecca Haskell <RHaskell@concho.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>;

Dakota Neel <DNeel2@concho.com>; 'Sheldon Hitchcock' <SLHitchcock@concho.com>; Carmona, Mike <Mike.Carmona@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Mr. Tavaréz,

Please be advised to attain chloride analyses before proceeding with proposed remediation as it will allow you to address possible chloride issues during excavation should any exist.

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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From: Tavaréz, Ike <Ike.Tavaréz@tetrattech.com>

Sent: Wednesday, July 11, 2018 3:43 PM

To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Cc: Rebecca Haskell <RHaskell@concho.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>; Dakota Neel <DNeel2@concho.com>; 'Sheldon Hitchcock' <SLHitchcock@concho.com>; Carmona, Mike <Mike.Carmona@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Christina,

Looking at the photos and plat, the impacted area inside the facility is congested with multiple lines in the area that will hinder the excavation areas and proposed depth. As discussed in the work plan, we will make an attempt to remove the impacted soil as practicable and defer the remaining impacted areas not accessible. Once excavated, Tetra Tech will collect the chloride samples after the excavation for project documentation. In addition, the release occurred at the oil transfer line (hammer union) located in the area of AH-3. We would like to proceed with proposed remediation and notify you before start the remediation. Let me know if you need additional information, thanks

Ike Tavaréz, PG | Senior Project Manager

Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavarez@tetrattech.com

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4000 North Big Spring, Suite 401 | Midland, TX 79705 | www.tetrattech.com

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From: Hernandez, Christina, EMNRD [<mailto:Christina.Hernandez@state.nm.us>]

Sent: Wednesday, July 11, 2018 10:28 AM

To: Tavarez, Ike <Ike.Tavarez@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Mr. Tavarez:

Please be advised to ample a couple of locations to prove out there is no chloride issue in the pillage area; not intensive CL sampling, just verification. The cost is little and yields valuable information. Additionally, it is also helpful and beneficial when assessing delineations reports/work plans to know where the release occurred on the map. Please provide information previously requested.

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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From: Tavarez, Ike <Ike.Tavarez@tetrattech.com>

Sent: Monday, July 9, 2018 7:05 PM

To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Carmona, Mike <Mike.Carmona@tetrattech.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrants@concho.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Christina,

According to the C-141, the release was crude oil with no water associated with the release and we typically only run TPH and BTEX analysis. Are you expecting to see chlorides in the crude oil? Also, if we analyzed for chlorides, we may encounter historical chlorides not related or representative to the crude oil reportable release. Please contact me or call me if we need to discuss further, thanks

Ike Tavaréz, PG | Senior Project Manager

Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878

Ike.Tavaréz@tetrattech.com

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From: Hernandez, Christina, EMNRD [<mailto:Christina.Hernandez@state.nm.us>]

Sent: Monday, July 09, 2018 5:18 PM

To: Carmona, Mike <Mike.Carmona@tetrattech.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>; Tavaréz, Ike <Ike.Tavaréz@tetrattech.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>

Subject: RE: COG- MC Federal #3 (1RP-4793)

Dear Mr. Carmona:

Please be advised that the delineation report/work plan submitted for 1RP-4793 is incomplete.

- Please submit chloride laboratory analyses for all sample locations.
- Also please include location of spill release/hammer union failure on maps and/or GPS coordinates.

Thanks,

Christina Hernandez

EMNRD-OCD

Environmental Specialist

1625 N. French Drive

Hobbs, NM 88240

575-393-6161 x111

Christina.Hernandez@state.nm.us

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From: Carmona, Mike <Mike.Carmona@tetrattech.com>
Sent: Friday, June 15, 2018 12:01 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>; Tavaréz, Ike <Ike.Tavaréz@tetrattech.com>; Gonzales, Clair <Clair.Gonzales@tetrattech.com>
Subject: COG- MC Federal #3 (1RP-4793)

Good Afternoon,

Attached is the work plan for the above referenced site located in Lea County, New Mexico. Once approved COG will implement the work plan.

Thank you,

Sincerely,

Mike J.Carmona |

Direct +1 (432) 687-8121 | Cell +1 (432) 270-0197 | mike.carmona@tetrattech.com

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