

From: [Yu, Olivia, EMNRD](#)
To: ["Jonathan Pennington"](#)
Cc: [Scott.Foord@ghd.com](#); [Raaj.Patel@ghd.com](#); [Al Garcia](#)
Subject: RE: 2018 Work Plan for Wyatt Phillips - 1RP-4825
Date: Tuesday, August 28, 2018 9:02:00 AM
Attachments: approved_2018 Wyatt Phillips Work Plan (1RP-4825).pdf

Good morning Mr. Pennington:

No subsequent information has been submitted to NMOCD, regarding 1RP-4825, since the last communication on January 2, 2018. Therefore, soil bore logs were not submitted or received. Pardon if I missed them in my inbox.

NMOCD will approve of the revised remediation plan for 1RP-4825 with the below stipulations:

Please be advised

- Except for specific conditions, NMOCD does not allow blending for chloride-impacted soil. For this release, the areas represented by Sample locations A, B, C, and G have chloride levels above permissible levels at surface up to 4 ft. bgs. These areas will require a 4 ft. excavation and minimal 20 mil liner, if applicable. Lined areas will still require sidewall confirmation samples, but not samples from the base of the excavation.
- Based on the delineation data from October 27, 2017, some sections of the release area (D, E, F, J) may not necessitate soil excavation or limited excavation (H, I). However, if subsequent confirmation sampling at these areas indicate that field titration tests demonstrate chloride values around 1000 mg/kg, stockpiling and blending soil may be permissible on the condition that blended soil must be laboratory tested every 50 cubic yards.
- Areas for deferral until time of abandonment, retrofit, or inactivity must have dimensions demarcated with GPS coordinates on a scaled map.

Please confirm or inform for clarifications.

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: Jonathan Pennington <Jonathan.Pennington@nblenergy.com>
Sent: Thursday, August 16, 2018 4:52 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Scott.Foord@ghd.com; Raaj.Patel@ghd.com; Al Garcia <Al.Garcia@nblenergy.com>
Subject: 2018 Work Plan for Wyatt Phillips - 1RP-4825

Dear Ms. Yu,

Effective January 31, 2018, Southwest Royalties, Inc. was transferred from NBL Permian LLC (a subsidiary of Noble Energy, Inc.) to Desert Permian LLC. As part of the transfer agreement, Noble agreed to continue performing site delineation and remediation activities related to release site 1RP-4825. Therefore, Noble Energy, Inc. respectfully submits the enclosed Revised Remediation Work Plan for 1RP-4825.

Please contact me if you have any questions.

Thanks,

Jonathan Pennington
Environmental Coordinator
EHSR

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