

From: Tucker, Shelly
To: [Yu, Olivia, EMNRD](#)
Cc: [Wright, Justin K](#); [Hernandez, Christina, EMNRD](#)
Subject: [EXT] Re: [EXTERNAL]RE: CAP for Ruby 28 1RP-4798
Date: Monday, October 1, 2018 2:07:02 PM

BLM concurs with NMOCD approval and stipulations.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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NOTE: LPC Timing Stipulations - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

On Fri, Sep 28, 2018 at 1:51 PM Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Wright:

Thank you for the clarification. While some exceptions would be granted on site-by-site basis, please be advised that all releases must have immediate corrective actions conducted under the revised 19.15.29 NMAC and abide by the site/release characterization details in 19.15.29.11 NMAC.

However, to facilitate resolution of 1RP-4798 and as the proposed remedial work will be more protective of the environment, NMOCD will agree that vertical delineation has been

completed and approves of the proposed remediation plan. Please be advised that for closure:

1. All confirmation bottom and sidewall samples (to complete horizontal delineation) must be analyzed for Benzene, BTEX, TPH extended, and chlorides. NMOCD requests that the sidewalls/borders between the proposed 2.5 ft. and 4 ft. excavation areas are to be included in confirmation samples.
2. Closure sample locations must be no greater than 200 square feet apart, documented by GPS coordinates on a scaled map.
3. Provide dated, georeferenced photo documentation.

BLM approval required. BLM may have additional concerns and stipulations.

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: Wright, Justin K <Justin.Wright@conocophillips.com>

Sent: Tuesday, September 25, 2018 4:51 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>

Subject: [EXT] RE: [EXTERNAL]RE: CAP for Ruby 28 IRP-4798

The chemical contained in the tank on location was SICI11104A Scale/corrosion combo. It was connected to the wellhead for treating the well string for corrosion and scale buildup. No there was no initial cleanup done on the location.

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Friday, September 21, 2018 4:14 PM
To: Wright, Justin K <Justin.Wright@conocophillips.com>; Tucker, Shelly <stucker@blm.gov>
Subject: [EXTERNAL]RE: CAP for Ruby 28 1RP-4798

Mr. Wright:

Thank you for following up and addressing 1RP-4798, despite the 1-year period between release date and first sample date. Please inform of the chemical that the tank was supposedly containing. The laboratory data did not contain analyses related to that particular chemical. Why was a chemical tank connected to the well? Also, were immediate corrective actions conducted to clean-up the heavily impacted soil at the time of release?

Per revised 19.15.29 NMAC, if the chemical released is not from the wellstream, then an alternative release characterization and remediation plan is necessary.

Thanks,

Olivia

From: Wright, Justin K <Justin.Wright@conocophillips.com>
Sent: Tuesday, August 28, 2018 12:05 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Subject: CAP for Ruby 28 1RP-4798

Please let me know of any questions or comments you may have. I will send the photos as soon as I have them uploaded. Thanks, Justin