

**From:** Robbie Runnels  
**To:** [Yu, Olivia, EMNRD](#)  
**Cc:** [Oberding, Tomas, EMNRD](#); [John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)  
**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H  
**Date:** Wednesday, May 17, 2017 8:53:39 AM

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Ms. Yu,

At this time, with remediation completed, it would be preferable for the Operator to defer the Closure until time of abandonment. At which time, the pad area can be properly delineated, and if needed, remediated and reclaimed. I will get the samples you requested from the pasture area this week in order to alleviate any questions with that area of the release.

Thank you,

Robbie Runnels  
Basin Environmental

----- Original Message -----

**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

**From:** "Yu, Olivia, EMNRD" <Olivia.Yu@state.nm.us>

**Date:** 5/16/17 7:32 am

**To:** "Robbie Runnels" <rrunnels@basinenv.com>

**Cc:** "Oberding, Tomas, EMNRD" <Tomas.Oberding@state.nm.us>

Mr. Runnels:

Yes, NMOCD still requests that a couple of samples be taken on the pad location for 1RP-4472. Although the well location is relatively new, operating since 2013, the release area was not properly demarcated on the map and a release characterization/corrective action plan was not submitted before the closure request. Thus, NMOCD requires 2 sample locations on the well pad to be vertically delineated on the well pad to close the 1RP. NMOCD allows some flexibility regarding the depth of vertical delineation needed to reach permissible chloride levels.

Is the concern about the potential for deep vertical delineation? If this is the case, one option is for the Responsible Operator to defer the 1RP-4472 until site abandonment as suggested. Please indicate preferred course of action.

Thanks,

Olivia

**From:** Robbie Runnels [mailto:[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)]

**Sent:** Monday, May 15, 2017 4:40 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

Ms. Yu,

Are you still wanting the pad sampled at the aforementioned site?

Thank you,

Robbie Runnels

Basin Environmental

----- Original Message -----

Subject: RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

From: "Yu, Olivia, EMNRD" <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

Date: 5/5/17 11:26 am

To: "Robbie Runnels" <[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)>

Mr. Runnel:

Thank you for the additional information. Do you have photographic evidence that is time-stamped to document the immediate cleanup and scraping?

To my knowledge, unless you can inform me otherwise, this OCD policy- no delineation/remediation on the pad until abandonment- is unofficial. I have been directed to request delineation on all releases, with rare exceptions. Still, I will

confer with my supervisors in Santa Fe and get back to you on this point. Is this suitable? What is your timeline for heading out to this site to conduct the additional sampling in the pasture?

Thanks,

Olivia

**From:** Robbie Runnels [<mailto:rrunnels@basinenv.com>]

**Sent:** Friday, May 5, 2017 7:58 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

Ms. Yu,

The pad has been scraped, removing all surface contamination. For my records, has the OCD changed its policy whereas the pad now requires complete remediation before abandonment? It was my understanding, and please correct me if I am erroneous in my assumption, but all that was required on the pad was the removal of all surface contamination. Any subsurface contamination was remediated at abandonment in that the pad served as a liner and breaking the integrity of the "liner" with remediation would actually pose more of a threat to the subsurface environment in the event of another release. What are your thoughts?

Robbie

----- Original Message -----

Subject: RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

From: "Yu, Olivia, EMNRD" <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

Date: 5/5/17 7:26 am

To: "Robbie Runnels" <[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)>

Good morning Mr. Runnels:

Thank you for your prompt response. Leaving spills on the pad until abandonment would not be advantageous for either the Responsible Operator or the environment, including groundwater. Why would it not be advisable to collect confirmatory samples with each release than to find the depth of contamination, and likely incurring deep excavation, at a future date?

Olivia

**From:** Robbie Runnels [<mailto:rrunnels@basinenv.com>]

**Sent:** Friday, May 5, 2017 7:06 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

Ms. Yu,

I will take the samples at depth in the pasture though SP 1 and SP 2 were taken at or very near the pooling area, but wouldn't it be more prudent to address the pad at abandonment?

Robbie

----- Original Message -----

Subject: RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

From: "Yu, Olivia, EMNRD" <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

Date: 5/4/17 4:01 pm

To: "Robbie Runnels" <[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)>

Cc: "Tucker, Shelly" <[stucker@blm.gov](mailto:stucker@blm.gov)>,  
"John.Wierzowiecki@blackmtn.com"

<[John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)>

Dear Mr. Runnels:

Thank you for this additional information regarding 1RP-4472. Given

the visual presence of pooled fluids rather than overspray in the photos, NMOCD requests that confirmatory soil samples be taken at Sample Points 1, 3, 4, and 5 at 5 ft. bgs to complete vertical delineation. The permissible chloride level for this location given the depth to groundwater and distance to surface waterbody is 600 mg/kg.

Also, were samples taken in the affected area on the pad as shown in the photo? If not, confirmatory samples at 5 ft. bgs are required, especially as a delineation workplan was not previously submitted and approved as requested in an email dated January 10, 2017.

Please confirm.

Thanks,

Olivia

**From:** Robbie Runnels [<mailto:rrunnels@basinenv.com>]

**Sent:** Tuesday, May 2, 2017 12:42 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** Tucker, Shelly <[stucker@blm.gov](mailto:stucker@blm.gov)>;

[John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)

**Subject:** RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

Ms. Yu,

The permanent containment is the secondary containment around the tanks. There was a pooled area in the pasture (see the attached). There was fluid on the pad as well, but had been remediated.

Please let me know if you have any more questions or comments.

Thank you,

Robbie Runnels

Basin Environmental

----- Original Message -----

Subject: RE: Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H  
From: "Yu, Olivia, EMNRD" <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
Date: 5/2/17 8:21 am  
To: "Robbie Runnels" <[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)>  
Cc: "Tucker, Shelly" <[stucker@blm.gov](mailto:stucker@blm.gov)>, "[John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)" <[John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)>

Good morning Mr. Runnels:

Please clarify a couple of discrepancies between the closure report and the submitted initial C-141 for 1RP-4472.

1. Page 1 of the closure report indicated that the majority of the release occurred on the "permanent containment area." To what does this refer? The secondary containment around the tanks?
2. The initial C-141 indicated that there was "pooling of oil and salt water on well site and adjacent pasture" in addition to oil mist on the pasture. Where were these pools? However, as written in the report, it appears that the only impact was the pasture that received overspray.

Also, if available, please provide photos prior to remediation activities.

Thanks,

Olivia Yu

Environmental Specialist

NMOCD, District I

[Olivia.yu@state.nm.us](mailto: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:** Robbie Runnels [<mailto:rrunnels@basinenv.com>]

**Sent:** Tuesday, May 2, 2017 7:18 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** Tucker, Shelly <[stucker@blm.gov](mailto:stucker@blm.gov)>;

[John.Wierzowiecki@blackmtn.com](mailto:John.Wierzowiecki@blackmtn.com)

**Subject:** Termination Request - 1RP - 4472 - Black Mountain, Madera 19 Fed #4H

Ms. Yu,

Attached is the Termination Request for the

aforementioned site. Please let me know if you have any questions or concerns.

Thank you,

Robbie Runnels

Project Manager

Basin Environmental Service Technologies

3100 Plains Hwy.

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[rrunnels@basinenv.com](mailto:rrunnels@basinenv.com)



# **Madera 19 Federal #4**

Unit Letter N, Section 19, T26S, R35E



Fluids on pad, facing southwest



Fluids on pad, facing southwest



Fluids on pad, facing southwest



Pooling in pasture, facing southwest