

From: [Yu, Olivia, EMNRD](#)
To: "Scott.Foord@ghd.com"; [Billings, Bradford, EMNRD](#); [Hernandez, Christina, EMNRD](#); [Ryan Mann \(rmann@slo.state.nm.us\)](#); [Jonathan Pennington](#); [Al Garcia](#); [Vince.Nacewski@ghd.com](#); [Michael.Gant@ghd.com](#)
Cc: [Meagan Willis](#); [Raaj.Patel@ghd.com](#)
Subject: RE: Former Southwest Royalties Sites NMOCD Hobbs Meeting Notes - 9-6-18
Date: Thursday, September 20, 2018 8:40:00 AM

Scott:

Essentially, blending of chloride-impacted soil has been used as 'dilution is the solution'. The revised rule aims to move away from this remedial activity as other constituents and potential contaminants/byproducts in the release are not known. Therefore, blended soil cannot be considered as uncontaminated or clean of waste products.

Thanks,
Olivia

From: Scott.Foord@ghd.com <Scott.Foord@ghd.com>
Sent: Thursday, September 20, 2018 8:19 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Ryan Mann (rmann@slo.state.nm.us) <rmann@slo.state.nm.us>; Jonathan Pennington <Jonathan.Pennington@nblenergy.com>; Al Garcia <Al.Garcia@nblenergy.com>; Vince.Nacewski@ghd.com; Michael.Gant@ghd.com
Cc: Meagan Willis <Meagan.Willis@ghd.com>; Raaj.Patel@ghd.com
Subject: RE: Former Southwest Royalties Sites NMOCD Hobbs Meeting Notes - 9-6-18

Olivia,

Thank you for your response. For clarification, please expand on soil blending not being permissible under the revised Release rule. We are unclear why soils with analytically confirmed chloride concentrations below 600 mg/kg would not be allowed as backfill over a lined excavation.

Thanks,
Scott

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Thursday, September 20, 2018 8:52 AM
To: Scott Foord <Scott.Foord@ghd.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Ryan Mann (rmann@slo.state.nm.us) <rmann@slo.state.nm.us>; Jonathan Pennington <Jonathan.Pennington@nblenergy.com>; Al Garcia <Al.Garcia@nblenergy.com>; Vince Nacewski <Vince.Nacewski@ghd.com>; Mike Gant <Michael.Gant@ghd.com>
Cc: Meagan Willis <Meagan.Willis@ghd.com>; Raaj Patel <Raaj.Patel@ghd.com>
Subject: RE: Former Southwest Royalties Sites NMOCD Hobbs Meeting Notes - 9-6-18

Good morning Scott et al:

Thank you for the summary of the meeting. Much appreciated. Several comments and clarifications:

- Another good resource for playa assessment is NM Environmental Department.
<https://www.env.nm.gov/surface-water-quality/wetlands/>
Ms. Maryann McGraw runs the Wetlands Program for NMED and conducts training for playa assessments. However, NMOCD recommends that for 1RP-1958, a professional wetland scientist will be assessing the playa, unless there is a GHD botanist skilled in freshwater/wetland plant identification (i.e., sedges, rushes, grasses) and a GHD soil scientist with experience in delineating of hydric soils.
- Please be advised that the soil blending procedure agreed upon for 1RP-4825 is an exception as the proposed remediation plan was underway before the effective date of the revised 19.15.29 NMAC. Soil blending will not be permissible for any future remedial plans under the revised Release rule per 19.15.29.13D(1): "...non-waste containing, uncontaminated, earthen material..."
- Please note that any release location without a NMOSE or USGS well within 0.5 mile radius will need to have a soil bore drilled down to at least 50 ft. bgs to verify that the presence/absence of unidentified groundwater.

FYI, the meeting document will be uploaded to each of the respective 1RPs.

Thanks again for your prompt attention to resolve these historic releases,

Olivia

From: Scott.Foord@ghd.com <Scott.Foord@ghd.com>

Sent: Wednesday, September 19, 2018 4:03 PM

To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Ryan Mann (rmann@slo.state.nm.us) <rmann@slo.state.nm.us>; Jonathan Pennington <Jonathan.Pennington@nblenergy.com>; Al Garcia <Al.Garcia@nblenergy.com>; Vince.Nacewski@ghd.com; Michael.Gant@ghd.com

Cc: Meagan Willis <Meagan.Willis@ghd.com>; Raaj.Patel@ghd.com

Subject: Former Southwest Royalties Sites NMOCD Hobbs Meeting Notes - 9-6-18

Everyone,

As agreed, meeting notes from the 9/6/18 meeting at the NMOCD Hobbs office regarding the former Southwest Royalties sites are attached for review. Please let me know if anyone has any questions or concerns.

Warm regards,

Scott Foord, P.G. | GHD | (832) 485-5208

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Minutes

09/19/18

Subject/Client: Former Southwest Royalties Sites/Noble Energy Ref. No. 11178685

From: Scott Foord, GHD Houston Tel: 713 - 734 - 3090

Venue/Date/Time: NMOCD Hobbs field office meeting notes/ 09-06-2018 /1500

Copies To: Attendees/teleconference

Attendees: Scott Foord, GHD Houston
Vince Nacewski, GHD Houston
Mike Gant, GHD Houston
Jonathan Pennington, Noble Energy
Al Garcia, Noble Energy
Bradford Billings, NMOCD
Olivia Yu, NMOCD
Christina Hernandez, NMOCD
Ryan Mann, NMSLO

Item Description	Action
<p>1. 1RP-1696, 1RP-4556, 1RP-4884 – Flying M SAU Battery #2:</p> <ul style="list-style-type: none">NMOCD was in concurrence that some of the soil and groundwater impact probably came from historic industry standard and acceptable oil and gas production operations in the region.NMOCD was in concurrence that the groundwater plume should be investigated further and that geophysical methods would be an acceptable start with the investigation.Additional soil assessment is warranted.A soil remediation work plan will be submitted for approval following completion of the additional assessment activities.	All reviewed and discussed
<p>2. 1RP-1958-0 – Flying M Playa Lake Release:</p> <ul style="list-style-type: none">NMOCD recommended further investigation to determine the physical characteristics of the feature, need to determine whether depression is truly a Playa lake.	



Item Description	Action
<ul style="list-style-type: none">• NMOCD recommended reaching out to the University of New Mexico for guidance on determining characteristics of Playa lakes.• Remediation options will be determined following the additional site characterization activities.• BLM must be in concurrence with NMOCD on work plans, etc.	
<p>3. 1RP-4841 – Flying M SAU Battery #3:</p> <ul style="list-style-type: none">• NMOCD agreed that further soil assessment is warranted.• A soil remediation work plan will be submitted for review following completion of the additional assessment activities.	
<p>4. 1RP-4825 - Wyatt Phillips:</p> <ul style="list-style-type: none">• Impacted soils above 600 mg/kg for chloride will be excavated to depth (estimated up to 8 ft bgs).• Impacted soils above 600 mg/kg chloride will be blended with non-impacted soil from the site and composite sampled every 50 cubic yards for laboratory analysis of chloride and TPH.• Confirmation soil samples will be collected from the bottom of the excavation and analyzed for chloride and TPH.• Blended soil with chloride and TPH concentrations below permissible levels will be utilized to backfill the excavation.• No liner will be required within the excavation.• Confirmation soil samples will be collected from the side walls of the excavation to verify permissible levels have been achieved laterally.• Regional soil experts will be contacted and utilized to determine proper soil amendments to promote re-growth within the remediated area.• Areas for deferral will be demarcated with detailed drawings and a scaled map.• NMOCD agreed that this remedial approach would be approved for the other sites.	
<p>5. 1RP-4918 – Eilliams Fed Battery:</p> <ul style="list-style-type: none">• NMOCD agreed that further soil assessment is warranted.• A soil remediation work plan will be submitted for review following completion of the additional assessment activities.	



Item Description	Action
<p>6. Additional topics discussed:</p> <ul style="list-style-type: none">• Depth to groundwater must be confirmed at each site.• New projects will require assessment/reporting/remediation timelines within 90 days of the discovery of the release.• NMOCD would look into deferral of NMOSE temporary well permit requirements.• Depth to groundwater must be confirmed at each site.• New projects will require assessment/reporting/remediation timelines within 90 days of the discovery of the release.	

Attachments: _____

This confirms and records GHD's interpretation of the discussions which occurred and our understanding reached during this meeting. Unless notified in writing within 7 days of the date issued, we will assume that this recorded interpretation or description is complete and accurate.