

**From:** [Jennifer Elrod](#)  
**To:** [Yu, Olivia, EMNRD](#); [Mann, Ryan](#)  
**Cc:** [Tim Green](#); [Hernandez, Christina, EMNRD](#)  
**Subject:** [EXT] RE: Gazelle 32 C-141\_1RP5198  
**Date:** Wednesday, November 14, 2018 7:46:09 AM  
**Attachments:** image001.png  
1RP5198\_GAZELLE 32\_C141\_Part 1\_09062018.pdf

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Ms. Yu:

I've attached a revised C-141 for the Gazelle 32 spill with calculations on how we determined the amount spilled. I believe you already received photos for this one.

Thank you,  
Jennifer

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**From:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Sent:** Monday, September 24, 2018 1:48 PM  
**To:** Jennifer Elrod <jelrod@chisholmenergy.com>; Mann, Ryan <rmann@slo.state.nm.us>  
**Cc:** Tim Green <tgreen@chisholmenergy.com>  
**Subject:** RE: Gazelle 32 C-141

Ms. Elrod:

Thank you for the photos. Please note that dated, georeferenced photo documentation should be of the release point, verifying that the release has been contained.

Please be advised that

1. The initial portion of the C-141 form does not include the calculations to determine the release volume. Visual estimation is not sufficient nor adequate. Please submit measurements in volume estimation; including dimensions, soil parameters (porosity, texture, bulk density, etc).
2. The GPS coordinates provided must be of the release point. Unless the release was from the wellhead (e.g., stuffing box), do not use the wellhead latitude and longitude units.
3. Per 19.15.29.10 NMAC, a major release necessitates immediate notification to NMOCD Environmental Bureau chief, in addition to District office.
4. Per 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.

The 1RP for this incident is

<b>5198</b>	9/21/2018	A	Chisholm	Gazelle 32 State Com 2BS 1H/2Y	30-025- 43906	18S-33E- 32C	9/3/2018
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Please remember to include this 1RP identifier to all communications. Revised NMAC 19.15.29 was effective on August 14, 2018. Delineate and remediate per regulation. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

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.

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**From:** Jennifer Elrod <[jelrod@chisholmenergy.com](mailto:jelrod@chisholmenergy.com)>  
**Sent:** Friday, September 14, 2018 12:30 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Brown, Maxey G, EMNRD <[MaxeyG.Brown@state.nm.us](mailto:MaxeyG.Brown@state.nm.us)>  
**Cc:** Tim Green <[tgreen@chisholmenergy.com](mailto:tgreen@chisholmenergy.com)>  
**Subject:** Gazelle 32 C-141

Olivia,  
Here is the Part 1 of the C-141 and pictures showing location after the vacuum truck had been used.

Thanks,  
Jennifer

*Jennifer Elrod*



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