

From: [Yu, Olivia, EMNRD](#)
To: ["Baker, Larry"; Oberding, Tomas, EMNRD; "hprice@blm.gov"](#)
Cc: [Carnes, Travis; Billings, Bradford, EMNRD](#)
Subject: RE: Final C-141 WBDU 43 WSW (1RP-4563)
Date: Friday, June 9, 2017 2:53:00 PM

Dear Mr. Baker:

Please note that NMOCD, under regulatory authority, determines the status of a RP. While Apache's determination that "the release had no environmental impact" is relevant, and taken into consideration, NMOCD is obligated to form our own decision. Upon re-evaluation of the submitted documents for 1RP-4563, NMOCD still requests these items:

- Documentation of depth to groundwater determination using NMOSE's database and/or other similar sources;
- Documentation of search for surface waterbodies and sources; noting any or none in the immediate area.
- Surface samples do not necessarily adequately characterize a release. Appreciating the undocumented quality of the water released, we nonetheless request, to be sure, that samples be collected in the area of pasture impacted. In at least one location central to the affected pasture area, please collect soil samples at one foot and two feet below ground surface. Samples should be collected for laboratory evaluation of chloride. OCD requires that the samples be assessed as per EPA 300.0 Methodology. A map indicating location of sample point and copy of laboratory analysis should be rendered to OCD District I office, in conjunction with the other information requested on depth to groundwater and surface water(s). Upon receipt of the above requested data, OCD will make a determination on closure of the RP/incident.

If there are any additional concerns or questions, please contact Brad Billings 505-476-3482 in the Santa Fe OCD offices.

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: Baker, Larry [mailto:Larry.Baker@apachecorp.com]

Sent: Tuesday, May 2, 2017 3:47 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; 'hprice@blm.gov' <hprice@blm.gov>
Cc: Carnes, Travis <Travis.Carnes@apachecorp.com>
Subject: RE: Final C-141 WBDU 43 WSW (1RP-4563)

Ms. Olivia,

“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.” Apache as adequately investigated this matter and during that investigation determined that the release had no environmental impact. The findings in the investigation were compiled and reported to the NMOCD and BLM. Apache considers this matter resolved. Please let me know if you wish to discuss or have any questions. Thanks and have a good day.

Bruce Baker
Apache Corporation
Environmental Corporation
Northwest District
Email: larry.baker@apachecorp.com
Mobile: 432-631-6982

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, May 02, 2017 3:36 PM
To: Baker, Larry <Larry.Baker@apachecorp.com>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; 'hprice@blm.gov' <hprice@blm.gov>
Subject: RE: Final C-141 WBDU 43 WSW (1RP-4563)

Dear Mr. Baker:

The final C-141 for 1RP-4563 is DENIED. Delineation to 0.5 ft is insufficient. Please provide documentation of depth to groundwater and distance to surface waterbody. At a minimum, NMOCD requests 5 ft. of vertical delineation.

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: Baker, Larry [<mailto:Larry.Baker@apachecorp.com>]
Sent: Tuesday, April 25, 2017 1:49 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Oberding, Tomas, EMNRD
<Tomas.Oberding@state.nm.us>; 'hprice@blm.gov' <hprice@blm.gov>
Subject: Final C-141 WBDU 43 WSW (1RP-4563)

All,

Attached is the final C-141, site map, field sample data, laboratory analysis for your review and approval. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

Bruce Baker
Apache Corporation
Environmental Technician
Northwest District
Email: larry.baker@apachecorp.com
Mobile: 432-631-6982

From: [Yu, Olivia, EMNRD](#)
To: ["Baker, Larry"; Oberding, Tomas, EMNRD; "hprice@blm.gov"](#)
Subject: RE: Final C-141 WBDU 43 WSW (1RP-4563)
Date: Tuesday, May 2, 2017 2:35:00 PM

Dear Mr. Baker:

The final C-141 for 1RP-4563 is DENIED. Delineation to 0.5 ft is insufficient. Please provide documentation of depth to groundwater and distance to surface waterbody. At a minimum, NMOCD requests 5 ft. of vertical delineation.

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: Baker, Larry [mailto:Larry.Baker@apachecorp.com]
Sent: Tuesday, April 25, 2017 1:49 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; 'hprice@blm.gov' <hprice@blm.gov>
Subject: Final C-141 WBDU 43 WSW (1RP-4563)

All,

Attached is the final C-141, site map, field sample data, laboratory analysis for your review and approval. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

Bruce Baker
Apache Corporation
Environmental Technician
Northwest District
Email: larry.baker@apachecorp.com
Mobile: 432-631-6982