

**State of New Mexico**  
**Energy, Minerals and Natural Resources Department**

**Michelle Lujan Grisham**  
 Governor

**Erin Taylor**  
 Acting Cabinet Secretary

**Ben Shelton**  
 Deputy Cabinet Secretary

**Albert C.S. Chang**, Director  
 Oil Conservation Division



**BY ELECTRONIC MAIL ONLY**

December 18, 2025

Melanie Nolan  
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 Melanie.nolan@hollyenergy.com

**RE: Holly Energy Partners-Operating, LP, Holly Energy WTX to EMSU Battery to Byrd Pump SE, Notice of a Complete Stage 1 Abatement Plan Proposal**

Dear Ms. Reddell:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed OGRID 282505 Holly Energy Partners-Operating, LP (Holly Energy) May 1, 2025, Stage 1 Abatement Plan (AP) Application ID 498177 submittal for Holly Energy's, Holly Energy WTX to EMSU Battery to Byrd Pump SE incident, ID# nOY1822242858.

Per 19.15.30.16 NMAC, OCD is required to notify Holly Energy of approval or notice of deficiency of the AP proposal. The Stage 1 Abatement Plan has been approved with conditions, see Application #498177 for a complete record of the required conditions on the OCD permitting website.

The public may view a copy of the Stage 1 Abatement Plan and the conditions online from OCD permitting under incident ID# nOY1822242858 at <http://www.emnrd.state.nm.us/ocd/>.

If Holly has any questions or concerns regarding this letter, please contact Ashley Maxwell at (505) 635-5000 or [Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov).

Respectfully,

*Rosa M. Romero*

Rosa Romero  
 Environmental Bureau Chief

## Stage 1 Abatement Plan Investigation Report

WTX to EMSU Battery to Byrd Pump Segment Gathering Line  
Lea County, New Mexico  
NMOCD Incident No. NOY1822242858

Prepared for:

Holly Energy Partners – Operating, L.P.  
Dallas, Texas

Prepared by:



TRC Environmental Corporation  
Austin, Texas

May 1, 2025

Project Manager  
Jared Stoffel

A handwritten signature in black ink that reads "Jared E. Stoffel".

Site Lead  
Bryan Gilbert

A handwritten signature in black ink that reads "Bryan Gilbert".



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## 1.0 Introduction

### 1.1 Site Description

On behalf of Holly Energy Partners-Operating, L.P. (HEP), TRC Environmental Corporation (TRC) is submitting this *Stage 1 Abatement Plan Investigation Report* (AP Investigation Report) for the WTX to EMSU Battery to Byrd Pump Segment Gathering Line (Site) located in Lea County, New Mexico. The release was a result of a leak from a pipeline owned by HEP.

The Site is located on private property owned by L&K Ranch, LLC near County Road 46 in Lea County, New Mexico. The Site is located within Unit P, Section 11, Township 20 South, Range 36 East with coordinates at 32.583874, -103.317460. The Site location is depicted on a topographic map presented in **Figure 1**. The surrounding land contains oil and gas production well pads and open range land. A site plan showing the pipeline and release location is presented on **Figure 2**.

### 1.2 Nature of the Release

The release occurred on July 11, 2018, and was reported to Ms. Olivia Yu, Hobbs District 1 New Mexico Oil Conservation Division (NMOCD) office on August 10, 2018. Remediation Permit (RP) 1RP-5154 was assigned to this release incident by the NMOCD Hobbs office. The initial Form C-141 is included in **Appendix A**.

The release was originally detected during an air patrol fly-over. The release was determined to have originated from a pinhole leak in the bottom of the 6-inch crude oil pipe. HEP personnel immediately shut down the pipe segment and the initial release volume was estimated at less than 1 barrel, therefore under reportable limits. After further investigation, the volume of the spill was reported as greater than 5 barrels, of which 0.5 barrel (or 21 gallons) was recovered with a vacuum truck.

### 1.3 Investigation Objectives

The objectives of investigation activities conducted from 2018 to 2025 were to delineate the extent of impacts associated with the 2018 HEP release, define the Site conditions, and provide the data necessary to select and design an effective abatement option. This report documents the investigation and monitoring activities completed to achieve the investigation objectives. Investigation activities were conducted in accordance with NMOCD-approved work plans, as discussed in Section 2.

### 1.4 Report Contents

This Stage 1 AP Investigation Report complies with the requirements pursuant to New Mexico Oil Conservation Division (NMOCD) Rule 19.15.30 New Mexico Administrative Code (NMAC) and incorporates work already performed at the Site. It includes a summary of Site investigation field methods, details the field activities performed at the site, presents the



results of the site investigation activities, and provides conclusions and recommendations for addressing crude oil-affected soil and groundwater at the Site. Detailed descriptions of Site investigations conducted in 2018, 2020, 2021, and 2022 were included in the reports listed below.

- 2018 and 2020 investigations: December 22, 2020, *Site Characterization Report* (SCR) (TRC, 2020b), which was approved by NMOCD on December 31, 2020.
- 2021 investigations: November 12, 2021, *Site Characterization Report and Remediation Workplan* (SCR and RWP) (TRC, 2021). A *Remediation Workplan Addendum* (RWP Addendum) was submitted to NMOCD on April 1, 2022 (TRC, 2022a). The November 2021 SCR and RWP and the April 2022 RWP Addendum were approved by NMOCD on December 9, 2021, and April 5, 2022, respectively.
- 2022 investigation: October 12, 2022, *Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report* (Bioventing Recommendation Report) (TRC, 2022b), which was approved by NMOCD on November 28, 2022.

Detailed descriptions of quarterly groundwater monitoring and/or light non-aqueous phase liquid (LNAPL) assessment activities were documented in annual groundwater monitoring reports, including:

- 2022 groundwater monitoring: April 28, 2023, *2022 Annual Groundwater Monitoring Report* (TRC, 2023), which was approved by NMOCD on June 7, 2023.
- 2023 groundwater monitoring: April 29, 2024, *2023 Annual Groundwater Monitoring Report* (TRC, 2024), which was approved by NMOCD on June 11, 2024.
- 2024 groundwater monitoring and LNAPL assessment: *2024 Annual Groundwater Monitoring and Bioventing O&M Report* will be submitted to NMOCD by May 1, 2025.

A Stage 2 AP will be submitted pending NMOCD approval of this Stage 1 AP. The Stage 2 AP will present an abatement remedy and the proposed abatement schedule. Based on discussions between HEP, the landowner, and NMOCD during April 2025, the Stage 2 AP will include a plan for excavation of affected soil and LNAPL, off-Site disposal, and backfilling with clean fill as the selected abatement option.

Copies of e-mail correspondence with NMOCD are included in **Attachment B**. Site chronology through April 2025 is included in **Appendix C**. Soil boring and well construction logs are presented in **Appendix D**.

## 2.0 Site Investigation Activities

A summary of soil and groundwater investigation and groundwater monitoring activities is provided below. The constituents of concern (COCs) associated with the crude oil release



include benzene, toluene, ethylbenzene, xylenes (BTEX); chloride; and total petroleum hydrocarbons (TPH).

## 2.1 July and August 2018 Exploratory Excavation

HEP conducted exploratory excavation activities, including a trench along the pipeline to a depth of approximately 3 feet below ground surface (bgs), on July 11 and 17, 2018, and completed a deeper excavation immediately south of the pipeline on July 23, 2018, and August 6, 2018, to determine the vertical extent of crude oil-affected soil. Excavation activities were halted on August 6, 2018, because it was determined that the crude oil-affected area was larger and deeper (i.e., deeper than 17 feet bgs) than originally anticipated. The excavated material was used to backfill the exploratory excavation areas.

## 2.2 September 2018 Soil Assessment

HEP retained GHD to perform subsurface assessment activities in accordance with 19.15.29 NMAC. On August 16, 2018, GHD submitted a *Soil Delineation Work Plan* (GHD, 2018a), to NMOCD and to the Bureau of Land Management (the mineral owner). NMOCD approved the work plan on September 10, 2018. The initial assessment was completed in September 2018 and included the determination of Site-specific NMOCD Closure Criteria (see Section 4.1) and completion of four soil borings (SB-1 through SB-4) to a maximum depth of 35 feet bgs. Select soil samples were submitted for laboratory analysis of BTEX by United States Environmental Protection Agency (EPA) Method 8021B, TPH by EPA Method 8015, and chloride by EPA Method 300. The results indicated the following:

- Detected concentrations and non-detect reporting limits for benzene and cumulative benzene, toluene, ethylbenzene, and xylenes (Total BTEX) were below the NMOCD Closure Criteria at all locations.
- Chloride and TPH concentrations were below the NMOCD Closure Criteria at all locations except for release area boring SB-1.

TPH was not detected in any of the samples collected from SB-2 through SB-4. Chloride was detected in samples collected from SB-2 through SB-4 at intervals deeper than 5 feet bgs, but none of the concentrations exceeded the Closure Criterion of 600 milligrams per kilogram (mg/kg). The soil boring locations are shown on **Figure 2**.

## 2.3 November 2020 Soil and Groundwater Assessment

On November 1, 2018, the *Soil Assessment Report* (GHD, 2018b) and *Supplemental Assessment Work Plan* (SAWP) (GHD, 2018c) were submitted to the NMOCD, who approved the SAWP on January 17, 2019. The scope of work proposed in the SAWP was delayed pending access agreement negotiations with L&K Ranch, LLC, the landowner. The access agreement with L&K Ranch, LLC was executed in March 2020.



In 2020, HEP retained TRC to complete the next phase of investigation activities. A modified scope was proposed to NMOCD and was provided by email on April 15, 2020, and in a *Remediation Plan and Status Update* (TRC, 2020a) document that was submitted to NMOCD on April 29, 2020. NMOCD reviewed the *Remediation Plan and Status Update* (TRC, 2020a) and requested by email on August 26, 2020, that a revised Form C-141 be submitted for the Site. The revised Form C-141 was submitted on September 10, 2020 (HEP, 2020), and was approved by NMOCD on September 23, 2020, with the following condition: "The release needs to be horizontally delineated at the surface." The revised Form C-141 is provided in **Appendix A** and NMOCD's approval email is provided in **Appendix B**.

In November 2020, HEP installed four 50-foot-deep soil borings (SB-05 to SB-08) in addition to the eight hand-auger borings (SB-9 to SB-16) to horizontally delineate the release at the surface, which is considered the upper four feet per 19.15.29.13 NMAC. Select soil samples were submitted for laboratory analysis of BTEX by EPA Method SW8260, TPH by EPA Method 8015M, and chloride by EPA Method 300.

Borings SB-05 through SB-08 were converted to monitoring wells MW-1 through MW-4, respectively. All four monitoring wells are approximately 50 feet deep, were installed with 20 feet of 2-inch polyvinyl chloride (PVC) 0.010-inch slotted screen and approximately 30 feet of 2-inch PVC riser pipe. Between 23 and 25 feet of filter (sand) pack were installed in the annular space of each well from the bottom to approximately 3 to 5 feet above the top of the screened interval. A minimum 2-foot-thick seal of hydrated bentonite was installed above the filter pack. The remaining annular space above the bentonite seal was grouted to the surface with bentonite grout. The wells were finished with flush mount surface completions. The wells were installed according to NMOSE rules (19.27.4 NMAC). Following installation, the wells were developed and sampled for laboratory analysis of BTEX by EPA Method SW8260, TPH by EPA Method 8015M, and chloride by EPA Method 300. The soil boring and well locations are shown on **Figure 2**.

Site assessment activities performed in 2018 and 2020 were documented in the December 2020 SCR (TRC, 2020b), which was approved by NMOCD on December 31, 2020. The December 2020 SCR included recommendations to conduct additional lateral and vertical delineation of soil with TPH concentrations above the Site-specific NMOCD Closure Criterion, sampling of existing Site monitoring wells, and installation and sampling of one upgradient monitoring well.

## 2.4 May and October 2021 Additional Soil and Groundwater Assessment

Additional soil and groundwater assessment were conducted in general accordance with the December 2020 SCR in May 2021. From May 24 to 28, 2021, 11 soil borings (SB-18 through SB-28) were drilled to laterally delineate hydrocarbon-affected surface soil. Select soil samples were submitted for laboratory analysis of TPH by EPA Method 8015M. Boring SB-25 was converted to upgradient monitoring well MW-05. The soil boring and well locations are shown on **Figure 2**.



Well MW-5 was constructed using 20 feet of 2-inch diameter PVC 0.010-inch slotted screen and approximately 30 feet of PVC casing. Sand pack was installed in the annular space of each well from the bottom to approximately 3 feet above the top of the screened interval. A 2-foot seal of hydrated bentonite was installed above the sand pack. The remaining annular space above the bentonite seal was grouted to the surface with cement-bentonite grout. The well was finished with a flush mount surface completion. After development of MW-05, wells MW-01 through MW-05 were gauged and sampled for laboratory analysis of BTEX by EPA Method SW8260, TPH by EPA Method 8015M, and chloride by EPA Method 300.

Based on the results of the May 2021 assessment activities, completion of at least two additional borings and collection of additional groundwater samples were proposed to and approved by NMOCD on July 16, 2021. From October 5 to 12, 2021, three soil borings (SB-29, SB-30, and SB-31) were drilled to laterally delineate hydrocarbon-affected soil beneath 4 feet bgs east and northeast of the release point. Select soil samples were submitted for laboratory analysis of TPH by EPA Method 8015M. Additionally, wells MW-01 through MW-05 were gauged and sampled for laboratory analysis of BTEX by EPA Method SW8260, TPH by EPA Method 8015M, and chloride by EPA Method 300. The soil boring and well locations are shown on **Figure 2**.

The SCR and RWP (TRC, 2021) was submitted to the NMOCD on November 12, 2021, and documented the additional Site assessment activities conducted in May and October 2021 including a comprehensive evaluation of soil and groundwater assessment data collected at the Site and presented remedial actions to achieve Closure Criteria in affected soils.

The NMOCD provided approval of the November 2021 SCR and RWP in a December 9, 2021, e-mail. The NMOCD's December 2021 approval e-mail included a request that an additional soil boring be drilled at existing boring location SB-19 and soil samples collected for analysis of BTEX. Chad Hensley with NMOCD submitted an email on January 18, 2022, requesting additional information on the bioventing injection process, a system diagram of bioventing injection, and latitude and longitude information for the pilot test injection and observation wells.

A meeting was conducted between HEP, NMOCD and TRC on January 25, 2022, to discuss the November 2021 SCR and RWP, NMOCD's December 2021 approval with comments, and NMOCD's January 18, 2022, e-mail. Based on the January 2022 meeting and as summarized in TRC's January 28, 2022, e-mail to NMOCD, a RWP Addendum was submitted to NMOCD on April 1, 2022 (TRC, 2022a). The remedial activities were proposed in the November 2021 SCR and RWP (TRC, 2021) and the April 2022 RWP Addendum were approved by NMOCD on December 9, 2021, and April 5, 2022, respectively.

## 2.5 August 2022 Soil Boring and Excavation Confirmation Soil Sampling

As requested by NMOCD, one soil boring was drilled immediately adjacent to (i.e., within 5 feet of) previous soil boring location SB-19 for collection of soil samples for laboratory analysis of HEP WTX to EMSU Battery to Byrd Pump Segment Stage 1 Abatement Plan Investigation Report

May 2025

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BTEX. On August 15, 2022, soil boring SB-19A was drilled to a depth of 35 feet bgs using a hollow-stem auger drill rig. Soil samples were collected from soil boring SB-19A and analyzed for BTEX by EPA Method SW8260 from the same intervals previously sampled for TPH analysis in May 2019 at soil boring SB-19.

In accordance with the November 2021 SCR and RWP and April 2022 RWP Addendum, excavation of surface soil with TPH concentrations above the Closure Criterion was conducted to a depth of 4.5 feet bgs on August 17, 18, and 25, 2022. Excavation sidewall confirmation soil samples were collected every 100 linear feet, while excavation bottom (floor) confirmation soil samples were collected every 200 square feet to document conditions at the excavation bottom prior to backfilling. Confirmation soil samples were collected for analysis of TPH by EPA Method 8015M. The excavation extent and confirmation soil sample locations are shown on **Figure 3**. The soil remediation activities are discussed below in Section 5.

## 2.6 2022 to 2025 Quarterly Groundwater Monitoring

Quarterly groundwater monitoring activities commenced in August 2022 in accordance with the April 2022 RWP Addendum. While previous groundwater assessment results indicated groundwater beneath the Site had not been affected by the 2018 HEP release, quarterly groundwater monitoring was proposed at the Site as a conservative measure to monitor groundwater quality during implementation of the soil remedies described in the April 2022 Remediation Workplan Addendum. Quarterly groundwater sampling commenced at the Site during the third quarter of 2022. Prior to the approval of the April 2022 RWP Addendum, three groundwater sampling events were conducted from November 2020 to October 2021 as part of assessment activities.

During each event, an oil-water interface probe was used to measure static depth to groundwater and depth to LNAPL, if present, to the nearest 0.01 foot in each monitoring well (MW-01 through MW-05). Starting in 2024, bioventing wells BV-1-D, BV-2D, BV-3-D, and BV-4 (discussed further in Section 5.3.1) were also gauged for depth to groundwater and depth to LNAPL, if present. Measurements were used to determine the groundwater elevation, seasonal groundwater elevation trends, and groundwater flow direction and gradient.

Monitoring wells without measurable LNAPL were purged and sampled using low-flow, low-stress sampling techniques during each quarterly groundwater monitoring event. An electric, submersible, variable-rate pump and disposable discharge tubing were slowly lowered into each well to prevent turbulence and mixing of any sediment from the bottom of the well. The pump was placed in the approximate center of the saturated screened interval and groundwater was purged at a low rate to minimize groundwater level drawdown in the wells. Discharge tubing was connected to a flow-through cell which housed a multi-parameter water quality meter. Groundwater quality parameters were measured approximately every three to five minutes during purging until at least three of the six recorded field parameters (pH, temperature, conductivity, oxidation-reduction potential, dissolved oxygen, and turbidity) were



stable. Monitoring well depth to groundwater and pump flow rate were also monitored during purging. The flow-through cell was disconnected, and a groundwater sample was collected from the discharge line of the pump once field parameters were stable. Samples were collected in clean, labeled, laboratory-supplied containers.

Groundwater samples were collected for laboratory analysis of TPH by EPA Method 8015M. Starting in March 2025, groundwater samples were additionally analyzed for BTEX by EPA Method SW8260. All samples were handled with new nitrile gloves and labeled with the sample identification, collection date and time, sample analysis, preservatives, and initials of the samplers. The samples were then placed on ice in a laboratory-supplied cooler which remained in the custody of the sampling personnel until shipped under chain of custody to the laboratory. All non-dedicated equipment was decontaminated prior to being used at the Site and after use at each well.

## 2.7 July 2024 LNAPL Transmissivity Testing

LNAPL was first observed at the Site in MW-01 on September 14, 2023, and was later observed in bioventing well BV-3-D in March 2024 and bioventing well BV-1-D in November 2024. As a result of the presence of LNAPL, on July 2, 2024, an LNAPL bail down test was conducted on bioventing well BV-3-D to estimate the transmissivity of LNAPL in the formation adjacent to the well. The purpose of the testing was to estimate LNAPL transmissivity at the Site, which can be used as a metric for evaluating the potential mobility and practicality of recovering LNAPL. LNAPL transmissivity data were processed and evaluated using the American Petroleum Institute (API) LNAPL Transmissivity Workbook. According to the Interstate Technology and Regulatory Council (ITRC), a calculated transmissivity of below 0.80 feet squared per day ( $\text{ft}^2/\text{day}$ ) indicates LNAPL may not be recoverable.

Based on the July 2024 testing, the LNAPL transmissivity was estimated to range between 0.39 and 1.11  $\text{ft}^2/\text{day}$  based on three calculation methods (Bouwer and Rice, Cooper-Jacob, and Cooper, Bredehoeft and Papadopoulos). The mean LNAPL transmissivity value of the three methods was 0.76  $\text{ft}^2/\text{day}$ , which is slightly less than the threshold at which LNAPL can be practically recovered. Transmissivity data indicate that while LNAPL recovery is possible, recovered LNAPL volumes are likely to be limited.

## 3.0 Site Geology and Hydrogeology

### 3.1 Site Geology

The regional geology for the Site was evaluated through review of the following: *National Geologic Map Database*, jointly curated by the United States Geological Survey (USGS) and Association of American State Geologists (AASG) (USGS and AASG, 2022); the USGS *Geologic Map of New Mexico* (USGS, 1965); *Geologic Atlas of Texas, Hobbs Sheet* (1976) prepared by the University of Texas at Austin (UT Austin) Bureau of Economic Geology (UT Austin Bureau of



Economic Geology, 1976); *Map of New Mexico* prepared by the New Mexico Bureau of Geology and Mineral Resources (New Mexico Bureau of Geology and Mineral Resources, 2003); *Geology, Open-File Geologic Map-304* prepared by the New Mexico Bureau of Geology and Mineral Resources (New Mexico Bureau of Geology and Mineral Resources, 2022); and *ESRI World Imagery* (ESRI, 2024). The surface geologic unit (*Qab*) mapped for the location is described as Quaternary aged “Alluvium and bolson deposits and other superficial deposits,” primarily located in the Querecho Plains located southwest of Hobbs, New Mexico. The Quaternary sediment unconformably overlies the Tertiary age Ogallala Formation. The Ogallala Formation is comprised of sands, silts, indurated calcium carbonate, gravel, and clay.

A surface soils map for the Site is shown in **Figure 4**. As shown, the surface soils at the Site are (PU) Pyote and Maljamar fine sands and (PY) Pyote soils and dune land which contain a mixture of sand, silt, and clay.

Based on soil borings completed as part of investigation activities, the lithology at the central and southern portions of the Site generally consists of fine/clayey sand from the ground surface to a depth ranging from 5 to 10 feet bgs; and alternating layers of sand, sandy clay, and sandy caliche with cobbles to a depth of 50 feet bgs. At boring SB-25/MW-05, which was drilled 95 feet northwest of the release point, the lithology generally consisted of fine/clayey sand from the ground surface to a depth of 9.5 feet bgs; alternating layers of sandy caliche with cobbles and fine sand to a depth of 20 feet bgs; weathered limestone to a depth of 25 feet bgs; and alternating layers of sandy clay, fine sand, and sandy caliche with cobbles to the total depth investigated of 50 feet bgs. The geologic cross section location lines are shown on **Figure 2**, while the geologic cross sections are shown on **Figure 5** (north-south) and **Figure 6** (east-west).

### 3.2 Site Hydrogeology

The following were reviewed as part of the evaluation of regional hydrogeology: *Ground-Water Conditions in Southern Lea County, New Mexico, Ground Water Report 6* (Nicholson, A., Jr, and Clebsch, A., Jr., 1961); *Current (2004–07) Conditions and Changes in Ground-Water Levels from Predevelopment to 2007, Southern High Plains Aquifer, Southeast New Mexico-Lea County Underground Water Basin* by Anne Tillery (Tillery, 2008); and NMOSE Interstate Stream Commission *WATERS Database* (NMOSE, 2024). The Site is located within the Lea County Basin and Landreth-Monument Draws Sub Basin (Unit 8). The regional depth to groundwater ranges from 25 to 45 feet bgs. The regional water level has declined in the Lea County Underground Water Basin since predevelopment and continues to decline. Groundwater in this area is primarily produced from the Ogallala Aquifer, which is the principal source of groundwater in northern and central Lea County. Groundwater quality is typically good with total dissolved solids (TDS) concentrations below 1,000 milligrams per liter (mg/L). Recharge primarily occurs via infiltration from precipitation events.

The depth to groundwater beneath the Site has ranged from 36 to 40 feet bgs. The groundwater potentiometric surface map for November 2024 is shown on **Figure 7**.



Groundwater flow is generally to the south-southeast at a hydraulic gradient of 0.002 to 0.003 feet per foot. Groundwater elevations have steadily decreased at all Site wells from November 2020 to March 2025.

### 3.3 Water Well Search Results

A Point of Diversion (POD) may be a structure used to divert surface water, a well, or surface water permit. There are two livestock watering locations on file with NMOSE POD registrations: one is approximately 0.5 miles southwest from the Site, and the other is approximately 0.15 miles northeast from the Site. The 0.5-mile wellhead protection area is shown on **Figure 8**. A summary of the livestock wells, former (abandoned) wells, and exploratory borings and wells located within 0.5-mile from the Site is provided below.

NMOSE Well ID	Distance/Direction from Release Point	Well Details
L14648-POD1 through L14648-POD4	Site	These are monitoring wells that were permitted for this investigation.
L10251	675 Feet to the Southwest (crossgradient)	Former windmill used for domestic uses and livestock watering. Was in use prior to 1931. No longer present.
L14799 POD1	0.5 Miles to the Southwest (crossgradient)	50-foot deep well permitted in December 2019 for livestock watering.
L14816 POD7	0.5 Miles to the West (crossgradient)	Environmental soil boring installed and plugged on August 3, 2020, as part of EMSU B #865 delineation by XTO Energy.
L15041 POD1	0.15 Miles to the Northeast (upgradient)	43-foot deep well permitted in December 2020 for livestock watering.

Other than the wells listed above, there are no known water sources, including springs, other wells, or other sources of freshwater extraction within 0.5-mile of the Site. Based on this information, no water wells are known to have been affected by the 2018 HEP release.

### 3.4 Site Surface Water Hydrology

The horizontal distance to the nearest significant watercourse as defined in Subsection P of 19.15.17.7 NMAC is greater than 0.5-mile from the Site (see **Figure 9**). The Site is located within the pipeline right-of-way (ROW) associated with oil production and on private property (L&K Ranch, LLC). No surface water bodies are located within 1,000 feet of the Site. The closest



surface water body, Green Meadow Lake, is located approximately 20 miles to the northeast of the Site. The Site is about five miles southwest of Monument, New Mexico containing multiple well pads and LNAPL gathering lines. The closest residence is approximately 0.9 miles northeast of the Site.

## 4.0 Investigation Results

### 4.1 Site Closure Criteria

Rule 19.15.29 NMAC provides cleanup standards for crude oil spills. The cleanup standards (described in the rule as "Closure Criteria") are based primarily on depth to groundwater but are also based on other criteria. Three different Closure Criteria are provided in the rule. The most stringent apply to sites where groundwater is found within 50 feet of the ground surface or if the release occurred within one of the following areas:

- Within 300 feet of any continuously flowing watercourse or any other significant watercourse.
  - No watercourses (rivers, streams, arroyos, etc.) are apparent within 300 feet of the Site in the aerial photography or on the topographic map (Figure 1).
- Within 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark).
  - There is not a lakebed, sinkhole, or playa lake located within 200 feet of the Site.
- Within 300 feet from an occupied permanent residence, school, hospital, institution or church.
  - The aerial photography and information available from the Lea County, New Mexico Central Appraisal District do not show or list any permanent residence, school, hospital, institution or church within 300 feet of the Site.
- Within 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes.
  - No wells or springs are located within 500 feet of the Site.
- Within 1,000 feet of any fresh water well or spring.
  - No fresh water wells or springs are located within 1,000 feet of the Site.
- Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended.
  - The Site is not located within the within a defined municipal fresh water well field.



- Within 300 feet of a wetland, overlying a subsurface mine, in an unstable area such as a karst formation, or within a 100-year floodplain.
  - The Site is not located within 300 feet of a wetland, overlying a subsurface mine, within a high karst area, or within 300 feet a 100-year floodplain.

Based on the presence of groundwater less than 50 feet bgs beneath the Site, the most stringent Closure Criteria apply to the Site. A map depicting the above Closure Criteria modifiers is presented on **Figure 9**. The Closure Criteria applicable to the Site is shown on **Table 1**.

#### 4.2 Soil

The following conclusions are based on the results of soil assessment activities conducted from 2018 to 2022:

- BTEX constituents were not detected in soil at concentrations above the Closure Criteria in any sample.
- Chloride was detected in soil above the Closure Criterion of 600 mg/kg in only one (boring SB-1 from 20 to 21 feet bgs) of the 50 original and duplicate soil samples collected and analyzed for chloride from 2018 to 2021 and was below the Closure Criterion in numerous samples with TPH concentrations above the Closure Criterion. The one chloride detection above the Closure Criterion was vertically delineated by a deeper sample collected from the same boring (SB-1) at 34 to 35 feet bgs and laterally delineated by samples collected from a similar interval at boring SB-05 to the north, boring SB-3 to the east-northeast, boring SB-08 to the southeast, boring SB-26 to the south, boring SB-07 to the southwest, and boring SB-4 to the west.
- TPH was detected in soil at concentrations above the Closure Criterion of 100 mg/kg in samples collected from borings SB-1, SB-05, SB-06, SB-09, SB-11, SB-13, SB-14, SB-18, SB-19, SB-21, SB-29, and SB-31 at depths ranging from 1.5 to 40 feet bgs. TPH concentrations above the Closure Criterion in surface soil (upper 4 feet) and soil beneath 4 feet bgs were laterally delineated. Vertical delineation was achieved with exception of at borings SB-1, SB-5, SB-6, SB-18, SB-19, SB-21, and SB-29 where TPH concentrations in the capillary fringe at the water table exceeded the Closure Criterion.

All soil with TPH concentrations above the Closure Criterion in the upper 4 feet was excavated and removed from the Site in August and September 2022. The areal extent of soil beneath 4 feet bgs with TPH concentrations above the Closure Criterion are depicted on **Figure 2**. The areal extent is based on the midpoint between borings and samples with exceedances and delineating borings and samples without exceedances at the appropriate depth interval.

The extent of soil beneath 4 feet bgs with TPH concentrations above the Closure Criterion includes the area of the release point and extends approximately 60 feet north of the release



point, 130 feet east of the release point, 20 feet south of the release point, and 40 feet west of the release point. With the exception of boring SB-31 (5 to 6 feet bgs), where the TPH exceedance is not attributed to the 2018 HEP release, TPH concentrations above the Closure Criterion in soil between 4 feet bgs and the capillary fringe (i.e., from 4 to 33 feet bgs) was limited to borings SB-05, SB-18, and SB-19, which are located within 20 feet of the release point. The remaining soil samples with TPH concentrations above the Closure Criterion only occurred within the capillary fringe (i.e., beneath 33 feet bgs) at borings SB-1, SB-6, SB-21 and SB-29, which are located more than 20 feet from the release point. This suggests a column of TPH-affected soil extends vertically from surface soil (prior to 2022 excavation) to the capillary fringe in the immediate vicinity of the release point. This column of TPH-affected soil is generally consistent with the former extent of surface soil with TPH concentrations above the Closure Criterion. Hydrocarbons then likely migrated laterally within the capillary fringe at depths beneath 33 feet bgs (i.e., TPH-affected soil at borings SB-1, SB-6, SB-21 and SB-29). The cross-sectional extent of TPH concentrations above the Closure Criterion are depicted on **Figures 5 and 6**.

Soil boring locations are shown on **Figure 2** while historical soil sample analytical results are presented on **Table 1**.

#### 4.3 Groundwater

The groundwater sample laboratory analytical results were compared to several water quality standards as follows:

- BTEX results were compared against the Human Health Standards for Groundwater presented in NMAC 20.6.2.3103(A).
- Chloride results were compared against the Other Standards for Domestic Water Supply presented in NMAC 20.6.2.3103(B).
- TPH results were not compared against a groundwater water quality standard as there is no groundwater quality standard for TPH listed in NMAC 20.6.2.3103(A).

The following conclusions are based on the results of groundwater assessment and monitoring activities conducted from 2020 to 2025:

- BTEX constituents have not been detected in any groundwater sample collected at the Site to date.
- In 2020 and/or 2021, chloride was detected in all five wells at concentrations above the standard for chloride in a domestic water supply of 250 mg/L. While chloride was present in groundwater above the standard for domestic water supply, the chloride concentrations at upgradient wells MW-02 and MW-05 were generally consistent with chloride concentrations at release area and downgradient wells MW-01, MW-03, and MW-04. Further, chloride was detected in only 1 of 50 total soil samples (47 original



samples and 3 duplicate samples) above the Closure Criterion (boring SB-1 from 20 to 21 ft bgs) and was below the Closure Criterion in numerous samples with TPH concentrations above the Closure Criterion. The distribution of chloride in groundwater beneath the Site and the absence of chloride in soil at concentrations above the Closure Criterion (exception of 1 sample) suggests the chloride concentrations in groundwater are naturally occurring or associated with an upgradient source or regional issue and are not related to the 2018 HEP release.

- TPH gasoline range organics (GRO), diesel range organics (DRO), and motor oil range organics (MRO) have been detected sporadically in wells MW-01 through MW-05. The presence of TPH at well MW-05, located upgradient of the Site, indicates potential contribution from an upgradient source or a regional issue.
- LNAPL was first detected at the Site in September 2023 in well MW-01. As part of the bioventing system installation (see Section 5.3.1 below), the bioventing wells were gauged in March 2024 and LNAPL was detected in both well MW-01 and bioventing well BV-3-D. Subsequently, all Site wells were gauged on a generally biweekly basis and LNAPL was detected in bioventing well BV-1-D beginning in October 2024.
- The LNAPL in the Site wells was observed to be dark with a sticky consistency and generally consistent with crude oil. The presence of measurable LNAPL in well MW-01 and bioventing wells BV-1-D and BV-3-D coincides with decreasing groundwater levels at the Site; the March 2025 groundwater elevation at MW-01 is the lowest since monitoring commenced in November 2020.

Overall, historical groundwater assessment and monitoring data indicate that groundwater beneath the Site has been affected by the 2018 HEP release based on the presence of LNAPL; however, the LNAPL is delineated and is not migrating laterally.

The monitoring and bioventing well locations are depicted on **Figure 2**; historical fluid level gauging results are presented on **Table 2**; and historical groundwater sample analytical results are presented on **Table 3**.

## 5.0 Summary of Interim Remediation Activities

### 5.1 August 2022 Soil Excavation

In accordance with the November 2021 SCR and RWP (TRC, 2021) and April 2022 RWP Addendum (TRC, 2022a), excavation of surface soil with TPH concentrations above Closure Criterion was conducted to a depth of 4.5 feet bgs on August 17, 18, and 25, 2022. An excavator was used for excavation activities in areas away from the pipeline, while hydro-excavation was conducted in the immediate vicinity of and beneath the pipeline. The excavation was extended laterally from the extent proposed in the April 2022 RWP Addendum until PID readings and visual and olfactory evidence indicated TPH concentrations were likely below Closure Criterion, at which point confirmation samples were collected for laboratory analysis. The wellhead for



MW-01 was protected during excavation activities using plywood; the plywood was removed following backfilling. On August 19 and September 1, 2022, 480 and 40 cubic yards of excavated soil (ex situ), respectively, were transported to J&L Landfarm in Hobbs, New Mexico, an NMOCD-permitted disposal facility, under non-hazardous waste manifest. The extent of the August 2022 excavation is shown on **Figure 3**.

On September 1, 2022, the excavation was backfilled to original grade using clean, imported fill. Pursuant to 19.15.29.13 NMAC, the area disturbed during remedial activities was restored to pre-release conditions by surface grading and reseeding. The results of excavation and conformation soil sampling were presented in the October 2022 Bioventing Recommendation Report.

## 5.2 August 2022 Bioventing Pilot Test

To facilitate remediation of TPH in soils below 4 feet bgs and in accordance with the November 2021 SCR and RWP and April 2022 RWP Addendum, from August 9 to 15, 2022, HEP performed a seven-day bioventing pilot test at the Site to evaluate the effectiveness of the technology and determine the optimum operational parameters to maximize treatment of TPH-affected soil at depths greater than 4.5 feet bgs. The objectives of the bioventing pilot test were:

1. Determine if ambient air from bioventing can propagate through the subsurface to promote populations of aerobic bacteria to degrade hydrocarbons present in Site soil.
2. Determine the effective radius of influence (ROI) of bioventing at the Site.
3. Estimate the aerobic degradation rate at the Site based on the results of a post-pilot test in-situ respirometry test.
4. Utilize results of the bioventing pilot test to determine if bioventing is an effective remedy for the Site and, if so, determine the optimum Site-specific design and operational parameters to maximize treatment of TPH-affected soil.

The following conclusions are based on the results of the seven-day bioventing pilot test:

- Pre-pilot test biodegradation of hydrocarbons in the release area was indicated by pre-injection soil gas readings at injection well MW-1, which indicated the presence of depleted oxygen levels and increased carbon dioxide levels relative to atmospheric levels immediately before commencing the pilot test. Depleted oxygen levels were also observed at injection well MW-1 before injection during each day of the pilot test.
- Pressure readings of at least 0.20 inches of water column (WC) were observed at all four observation wells during the pilot test. Based on the distance from injection well MW-1 to the farthest observation well (MW-05), located 90 feet from MW-1, the effective ROI for bioventing is at least 90 feet. The potential impact from diurnal



fluctuations in atmospheric pressure is considered insignificant and is not likely to have affected the pilot test results.

- Soil gas oxygen, carbon dioxide, and volatile organic compound (VOC) levels were observed to fluctuate at all four observation wells during the pilot test. Evaluation of the soil gas fluctuations at the observation wells indicated that the injection of ambient air at well MW-1 during the pilot test “pushed” vadose zone soil gas from MW-1, located in the release area, outward toward the observation wells. This effect was observed each day of the pilot test at the four observation wells in the form of initial high oxygen/low carbon dioxide levels, then the wave front of low oxygen/high carbon dioxide levels from the injection area, and finally a return to high oxygen/low carbon dioxide levels from the injection area by the end of each day. VOC levels were also observed to increase slightly during injection before returning to pre-injection conditions at the end of each injection cycle.
- The bioventing results indicate that oxygenated ambient air was able to propagate laterally at least 90 feet through the sandy layer in the vadose zone. Thus, the Site lithology is well suited to bioventing.
- The aerobic degradation rate was determined to be 0.90 mg of hydrocarbons per kilogram of soil per day. This rate of hydrocarbon degradation equates to a normalized degradation of 125 gallons of hydrocarbons degraded per acre per year, which indicates bioventing is a feasible remediation technology for the Site.

Based on the pilot test results, bioventing was determined to be an effective remedial technology for promoting biodegradation of and reducing TPH concentrations in vadose zone soil at the Site. The results of the pilot test and the proposed design for implementation of a full-scale bioventing system were presented in the October 2022 Bioventing Recommendation Report.

### 5.3 2023 and 2024 Bioventing System Installation and Operation

#### 5.3.1 System Installation

Four bioventing injection wells were installed from May 3 to 10, 2023, in general accordance with the October 2022 Bioventing Recommendation Report, which was approved by NMOCD on November 28, 2022. Three nested (BV-1 through BV-3) and one non-nested (BV-4) bioventing injection wells were installed at the Site. The locations of the bioventing wells are presented on **Figure 2**. Each nested well was screened to allow for injection at shallow (i.e., BV-1-S, BV-2-S, and BV-3-S), intermediate (i.e., BV-1-I, BV-2-I, and BV-3-I), and deep (i.e., BV-1-D, BV-2-D, and BV-3-D) intervals to target the entire vadose zone soil column from 4.5 ft bgs to the water table, including the capillary fringe. Non-nested bioventing injection well BV-4 was installed east of the release area and screened across the deep interval to target the capillary fringe. The bioventing injection wells were constructed using 2-inch diameter schedule 40 PVC casing and 0.020-inch slotted screen; the final screen intervals were within 2 feet of the screen



intervals proposed in the October 2022 *Bioventing Recommendation Report*. A 10- to 20-grade silica sand was installed at least 0.5 feet above and below each screen interval with the exception of bioventing injection well BV-2, where the top of the shallow screen interval (BV-2-S) is approximately even with the bottom of the bentonite seal. At least 2 feet of hydrated bentonite were installed between each screen interval and above the shallowest screen interval. All wells were completed at grade with a protective traffic-rated well vault.

As described in email correspondence dated August 18, 2023, October 4, 2023, November 1, 2023, and November 16, 2023, difficulties were encountered arranging for the installation of an electrical power drop at the Site for operation of the planned electrical-powered bioventing system. Xcel Energy, the local electricity provider, was unable to procure an easement for the electrical power drop with adjacent property owners; therefore, alternative power sources for the bioventing system were evaluated. As described in email correspondence to NMOCD dated February 14, 2024, the system design was switched to a propane-powered bioventing system. The switch from electrical power to propane power did not change the overall capability of the bioventing system. Copies of e-mail correspondence with NMOCD are included in **Attachment B**.

In April and May 2024, the propane-powered bioventing system was installed at the Site. The system was activated on June 5, 2024. The system was designed to operate 24-hours per day, but to cycle through the three depth intervals on an 8-hour frequency.

### **5.3.2 System Operation & Maintenance**

Biweekly Site visits were conducted to collect performance monitoring parameters and conduct operation and maintenance (O&M) of the full-scale system in accordance with the Bioventing Recommendation Report. During each O&M event, soil gas levels, injection flow rate and well pressures were measured from wellheads to assess system performance. In addition, in-situ respirometry testing was also conducted to measure hydrocarbon degradation rates at each injection point. System operation was suspended on October 7, 2024, to re-address remediation due to the presence of LNAPL in Site wells. The system remains shut down pending a remediation evaluation and submittal of a Stage 2 Abatement Plan to NMOCD.

Overall, the system operation was successful in creating and sustaining aerobic conditions in the subsurface and achieving biodegradation of contaminant mass. The monitoring suggests that more contaminant mass remains in the treatment zone, and that additional operation would be needed to further reduce contaminant concentrations to achieve the response action objective. Bioventing system O&M data will be presented in the *2024 Annual Groundwater Monitoring and Bioventing O&M Report*, which will be submitted to NMOCD by May 1, 2025.

### **5.4 LNAPL Recovery**

In response to the late 2023 detections of LNAPL in Site well MW-01, biweekly LNAPL monitoring and abatement activities were initiated including the deployment of sorbent socks in MW-01, manual LNAPL recovery via hand-bailing, and gauging of monitoring and bioventing



wells. LNAPL was detected in bioventing wells BV-3-D (down/cross-gradient from the release location) beginning in March 2024 and in BV-1-D (upgradient from the release location) beginning in October 2024; in response, biweekly hand-bailing was initiated at these wells.

In 2024, approximately 0.36 gallons of LNAPL were recovered from MW-01, approximately 0.40 gallons of LNAPL were recovered from bioventing well BV-1-D, and approximately 6.36 gallons of LNAPL were recovered from bioventing well BV-3-D, for a total of 7.12 gallons of LNAPL recovered in 2024. As of March 2025, a cumulative total of 13 gallons of LNAPL has been recovered from the Site via sorbent socks and hand-bailing activities since recovery began in 2023.

As indicated in the November 4, 2024, email correspondence to NMOCD, a belt skimmer pump was installed in bioventing well BV-3-D to facilitate LNAPL recovery from the well. The skimmer pump was installed on December 17, 2024, but did not begin operation until January 2025.

## 6.0 Proposed Monitoring Program

Quarterly groundwater monitoring will continue at the Site in accordance with the following program:

- An oil-water interface probe is used to measure static depth to groundwater and depth to LNAPL, if present, to the nearest 0.01 foot in monitoring wells MW-01 through MW-05 and bioventing wells BV-1-D, BV-2D, BV-3-D, and BV-4. Measurements are used to determine the groundwater elevation, seasonal groundwater elevation trends, and groundwater flow direction and gradient.
- Monitoring wells without measurable LNAPL are purged and sampled using low-flow, low-stress sampling techniques during each event. A submersible variable-rate pump or bladder pump and disposable discharge tubing are slowly lowered into each well to prevent turbulence and mixing of any sediment from the bottom of the well. The pump is placed in the approximate center of the saturated screened interval and groundwater is purged at a low rate to minimize groundwater level drawdown in the wells. Discharge tubing is connected to a flow-through cell which housed a multi-parameter water quality meter. Groundwater quality parameters are measured approximately every three to five minutes during purging until at least three of the six recorded field parameters (pH, temperature, conductivity, oxidation-reduction potential, dissolved oxygen, and turbidity) are stable. Monitoring well depth to groundwater and pump flow rate are also monitored during purging. The flow-through cell is disconnected, and a groundwater sample is collected from the discharge line of the pump once field parameters are stable. Samples are collected in clean, labeled, laboratory-supplied containers.
- The samples are handled with new nitrile gloves and labeled with the sample identification, collection date and time, sample analysis, preservatives, and initials of the



samplers. The samples are then placed on ice in a laboratory-supplied cooler which remained in the custody of the sampling personnel until shipped under chain of custody to the laboratory. Groundwater samples are collected for laboratory analysis of BTEX by EPA Method SW8260 and TPH by EPA Method 8015M.

- Field duplicate samples are collected at a rate of 5 percent of the original samples, with at least one duplicate sample collected per event. The “blind” duplicate sample is collected concurrently with the original sample. At least one equipment blank is collected from non-dedicated equipment per monitoring event for laboratory analysis of BTEX by EPA Method SW8260 and TPH by EPA Method 8015M. Trip blanks are included with each cooler for laboratory analysis of BTEX by EPA Method SW8260.
- All non-dedicated equipment are decontaminated prior to being used at the Site and after use at each well.
- Data are reviewed to ensure that reported analytical results meet standard data quality objectives and laboratory-specified control limits. Data are reviewed with respect to analytical holding times, sample preservation, blanks (method and trip), laboratory control sample recoveries, matrix spike/matrix spike duplicate recoveries, and surrogate recoveries.
- All investigation-derived waste (IDW) generated during monitoring activities, including purge and decontamination water and used personal protective equipment, are temporarily stored at the Site in 55-gallon or 5-gallon buckets pending off-Site disposal as non-hazardous waste.

The monitoring and bioventing well locations are depicted on **Figure 2**, while the monitoring and bioventing well top-of-casing and ground surface elevations, total depths, and screen intervals are shown on **Table 2**. The Quality Assurance Plan implemented as part of the monitoring program is consistent with the sampling and analytical techniques listed in Subsection B of 20.6.2.3107 NMAC. The groundwater monitoring results are documented in annual groundwater monitoring reports to be submitted to NMOCD within 120 days of the end of the calendar year.

## 7.0 Conclusions

The following conclusions are based on investigation and monitoring data collected from 2018 to 2025:

- The most stringent Closure Criteria apply based on the presence of groundwater less than 50 feet bgs beneath the Site. However, no water wells or other sensitive receptors have been affected or are threatened by the 2018 HEP release.
- BTEX constituents were not detected in soil at concentrations above the Closure Criteria in any sample, while chloride was detected in soil above the Closure Criterion in only one sample.



- TPH was detected in soil at concentrations above the Closure Criterion in samples collected from 1.5 to 40 feet bgs; the lateral extent of TPH in soil above the Closure Criterion was laterally delineated in all directions. A column of TPH-affected soil extends vertically from surface soil (prior to 2022 excavation activities) to the capillary fringe in the immediate vicinity of the release point. The column of TPH-affected soil is generally consistent with the former extent of surface soil with TPH concentrations above the Closure Criterion. Hydrocarbons then likely migrated laterally within the capillary fringe at depths beneath 33 feet bgs.
- All soil with TPH concentrations above the Closure Criterion in the upper 4 feet were excavated and removed from the Site in August and September 2022.
- BTEX constituents have not been detected in any groundwater sample collected at the Site to date.
- The distribution of chloride in groundwater beneath the Site and the absence of chloride in soil at concentrations above the Closure Criterion indicate the chloride concentrations in groundwater are naturally occurring and are not related to the 2018 HEP release.
- Low level TPH GRO, DRO, and MRO have been detected sporadically in groundwater at wells MW-01 through MW-05. The presence of TPH at well MW-05, located upgradient of the Site, indicates potential contribution from an upgradient source or a regional issue.
- Measurable LNAPL has been detected at the Site since September 2023, including in well MW-01 and bioventing wells BV-1-D and BV-3-D. The presence of measurable LNAPL in these wells coincides with decreasing groundwater levels and indicates that groundwater beneath the Site has been affected by the 2018 HEP release. The LNAPL is delineated and is not migrating laterally.
- LNAPL recovery measures have been implemented, including: deployment of sorbent socks in well MW-01; periodic manual LNAPL recovery via hand-bailing in wells MW-01, BV-1-D, and BV-3-D; and installation of a skimmer pump in well BV-3-D in December 2024. As of March 2025, a cumulative total of 13 gallons of LNAPL has been recovered from the Site since recovery began in 2023.
- Based on the results of a 2022 pilot test, a propane-powered bioventing system was installed at the Site in April and May 2024. The system was activated on June 5, 2024, and operated until October 7, 2024. Overall, the system operation was successful in creating and sustaining aerobic conditions in the subsurface and achieving biodegradation of contaminant mass. Data also suggest that contaminant mass remained in the treatment zone. The system was shut down to re-address remediation due to the presence of LNAPL in several Site wells.

Based on the results of historical investigation and monitoring activities conducted to date, Stage 1 AP investigation activities are complete.



## 8.0 Recommendations

The following recommendations are based on the data collected from 2018 to 2025:

- Quarterly groundwater monitoring will continue at the Site during 2025, unless the Site remediation path is altered, with NMOCD approval. The five monitoring wells and four bioventing wells will be gauged for depth to LNAPL, if present, and depth to groundwater during each quarterly groundwater monitoring event. Groundwater samples will be collected from monitor wells without measurable LNAPL for laboratory analysis of BTEX by EPA Method SW8260 and TPH by EPA Method 8015M.
- Monthly LNAPL abatement will continue at the Site during 2025, unless the Site remediation path is altered, with NMOCD approval. Pending Site conditions (i.e., apparent LNAPL thicknesses), the sorbent sock in well MW-01 will be removed and replaced during each quarterly groundwater monitoring event; the belt skimmer pump installed in bioventing well BV-3-D will be operated if measurable LNAPL is present; and manual LNAPL recovery via hand bailing will be conducted at bioventing well BV 1-D.
- Annual reporting to document groundwater monitoring and LNAPL abatement activities will continue during 2025. The *2024 Annual Groundwater Monitoring and Bioventing O&M Report* will be submitted to NMOCD by May 1, 2025.
- A geotechnical study, including a slope stability analysis, will be conducted in 2025 as part of an engineering evaluation of excavation and off-Site disposal of the crude oil-affected soil and LNAPL at the Site. The study must be conducted to ensure the safety of Site workers.
- Pending NMOCD approval of this Stage 1 AP Investigation Report and completion of the geotechnical study and slope stability analysis, a Stage 2 AP will be prepared and submitted to NMOCD.

In accordance with 19.15.30.13 NMAC, a Stage 2 AP must be submitted to NMOCD within 60 days (or up to 120 days for good cause shown) after the NMOCD's approval of the final Stage 1 AP Investigation Report.

## 9.0 References

ESRI, 2024. ESRI World Imagery. 2024.

GHD, 2018a. Soil Delineation Work Plan. August 16, 2018

GHD, 2018b. Soil Assessment Report. November 1, 2018.

GHD, 2018c. Supplemental Assessment Work Plan. November 1, 2018.

HEP, 2018. Initial Form C-141 Release Notification and Corrective Action. August 10, 2018.



HEP, 2020. Revised Form C-141 Release Notification, Initial Response, Site Assessment/Characterization, and Remediation Plan. September 10, 2020.

New Mexico Bureau of Geology and Mineral Resources, 2003. Geologic Map of New Mexico. 2003.

New Mexico Bureau of Geology and Mineral Resources, 2022. Geology, Open-File Geologic Map-304, Geologic Map Database of New Mexico. 2003, revised 2022.

NMOSE, 2024. New Mexico Office of the State Engineer Interstate Stream Commission WATERS Database. 2024.

Nicholson, A., Jr, and Clebsch, A., Jr. Geology and Ground-Water Conditions in Southern Lea County, New Mexico, Ground Water Report 6. 1961.

Tillery, 2008. Current (2004–07) Conditions and Changes in Ground-Water Levels from Predevelopment to 2007, Southern High Plains Aquifer, Southeast New Mexico-Lea County Underground Water Basin. 2008.

TRC, 2020a. Remediation Plan and Status Update. April 29, 2020.

TRC, 2020b. Site Characterization Report, WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release, NMOCD Incident No NOY1822242858. December 2020.

TRC, 2021. Site Characterization Report and Remediation Workplan. November 12, 2021.

TRC, 2022a. Remediation Workplan Addendum. April 1, 2022.

TRC, 2022b. Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report. October 12, 2022.

TRC, 2023. 2022 Annual Groundwater Monitoring Report. April 28, 2023.

TRC, 2024. 2023 Annual Groundwater Monitoring Report. April 29, 2024.

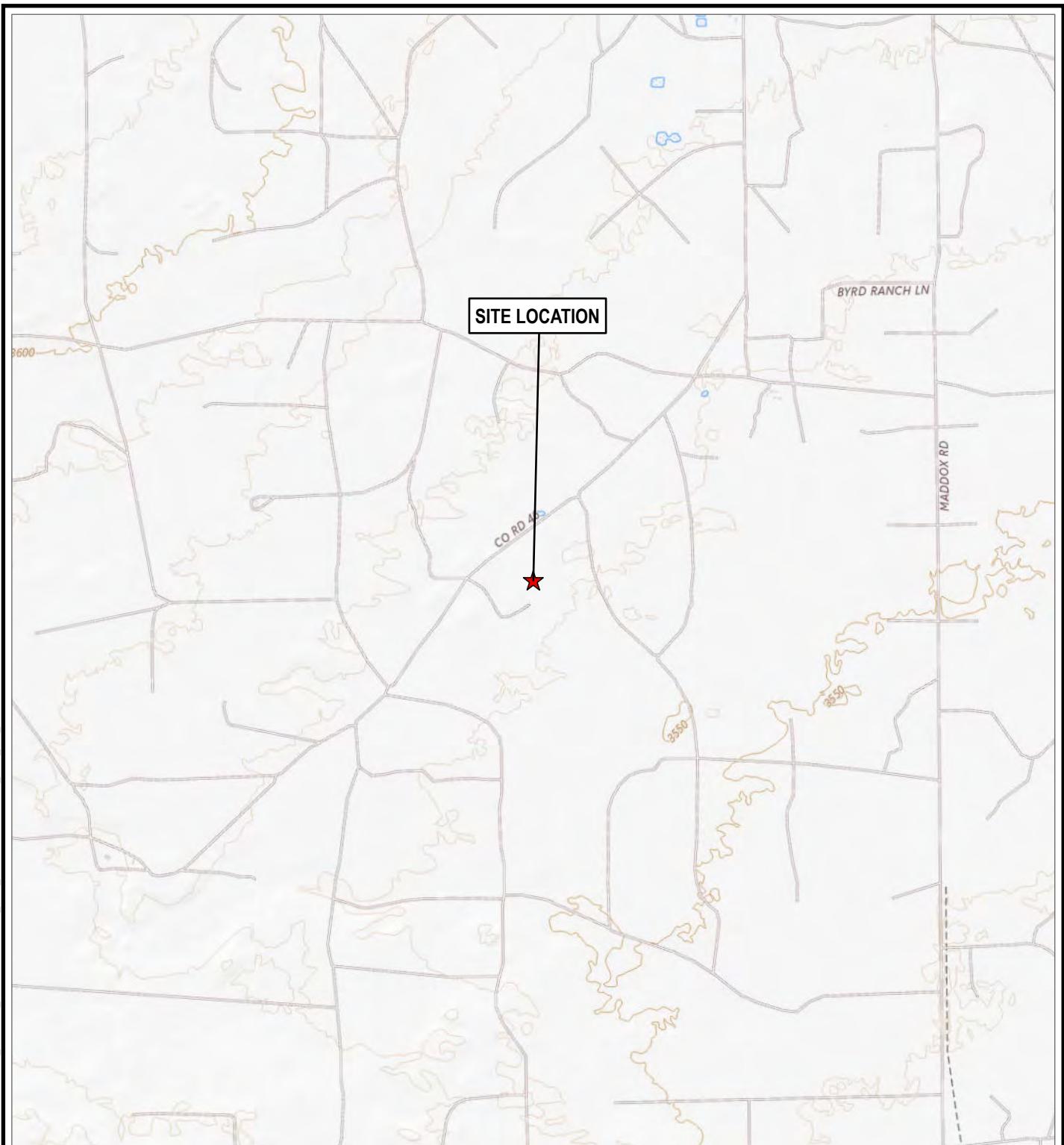
USGS, 1965. Geologic Map of New Mexico. 1965.

USGS and AASG, 2022. National Geologic Map Database. Jointly curated by the USGS and AASG. 2022.

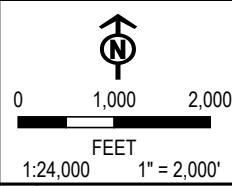
UT Austin Bureau of Economic Geology, 1976. Geologic Atlas of Texas, Hobbs Sheet. 1976.



## FIGURES



★ SITE LOCATION



PROJECT: HOLLY ENERGY PARTNERS - OPERATING, L.P.  
MONUMENT, LEA COUNTY, NEW MEXICO  
WTX TO EMSU BATTERY RELEASE SITE

TITLE:

### SITE LOCATION MAP

DRAWN BY: J. WEST PROJ. NO.: 648862

CHECKED BY: D. CLARK

APPROVED BY: B. GILBERT

DATE: APRIL 2025

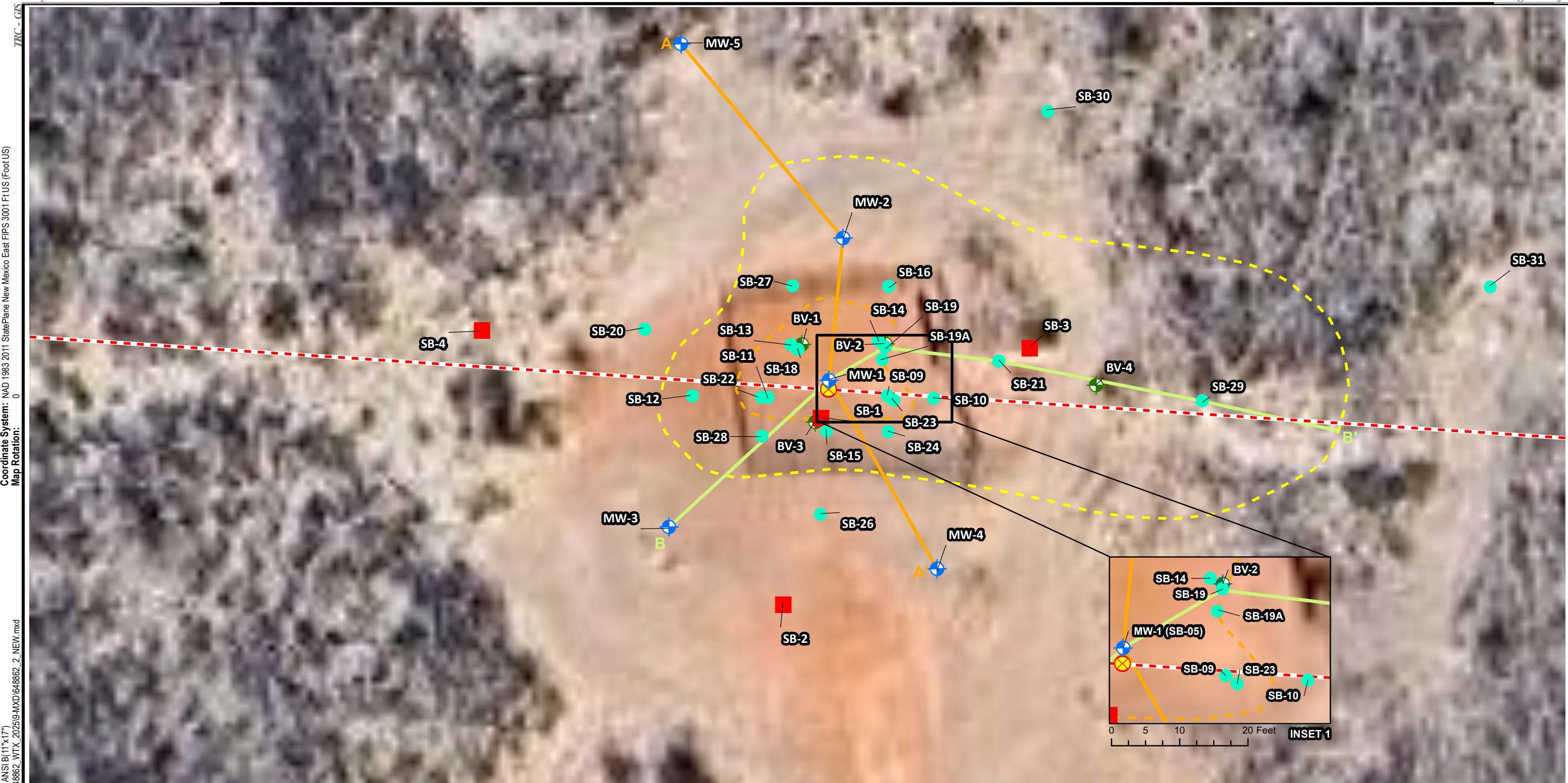
**FIGURE 1**



505 EAST HUNTLAND DRIVE  
SUITE 250  
AUSTIN, TX 78752  
PHONE: 512.329.6080

648862\_WTX\_GW\_2025

BASE MAP: ESRI "USGS TOPO" ONLINE SERVICE LAYER  
USGS 7.5' QUADRANGLE: MONUMENT SOUTH, NM (2023)  
DATA SOURCES: TRC, ESRI, USGS

**LEGEND**

- GHD SOIL BORING LOCATION
- MONITORING WELL LOCATION
- TRC SOIL BORING LOCATION
- 6" GATHERING LINE
- RELEASE LOCATION
- EXTENT OF SURFACE SOIL (0-4 FEET BGS) WITH TPH AND/OR CHLORIDE CONCENTRATION ABOVE SITE CLOSURE CRITERIA (BEFORE AUGUST 2022 EXCAVATION)
- EXTENT OF SOIL BENEATH 4 FEET BGS WITH TPH AND/OR CHLORIDE CONCENTRATION ABOVE SITE CLOSURE CRITERIA
- CROSS SECTION A-A' LOCATION LINE
- CROSS SECTION B-B' LOCATION LINE
- BIOVENTING WELL LOCATION

SOURCE: AERIAL IMAGERY - GOOGLE AND THEIR DATA PARTNERS (1/3/2023)

NOTES:

- GHD SOIL SAMPLES (SB-1 THROUGH SB-4) COLLECTED ON 9/28/2018.
- TRC SOIL SAMPLES (SB-05 THROUGH SB-16) COLLECTED ON 11/3-6/2020.
- TRC SOIL SAMPLES (SB-18 THROUGH SB-28) COLLECTED ON 5/24-28/2021.
- SB-17 INADVERTENTLY SKIPPED.
- TRC SOIL SAMPLES FROM SB-29 THROUGH SB-31 COLLECTED ON OCTOBER 5-7, 2021.
- TRC SOIL SAMPLES FROM SB-19A COLLECTED ON AUGUST 15, 2022.

**PROJECT:** HOLLY ENERGY PARTNERS - OPERATING, L.P.  
**MONUMENT, LEA COUNTY, NEW MEXICO**  
**WTX TO EMSU BATTERY RELEASE SITE**

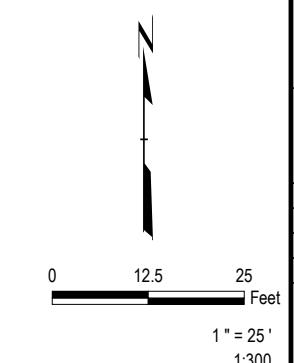
**BORING, WELL, AND CROSS SECTION LOCATION MAP**

DRAWN BY: R. COLLINS PROJ NO.: 648862.0000.0000  
 CHECKED BY: B. GILBERT  
 APPROVED BY: B. GILBERT  
 DATE: APRIL 2025

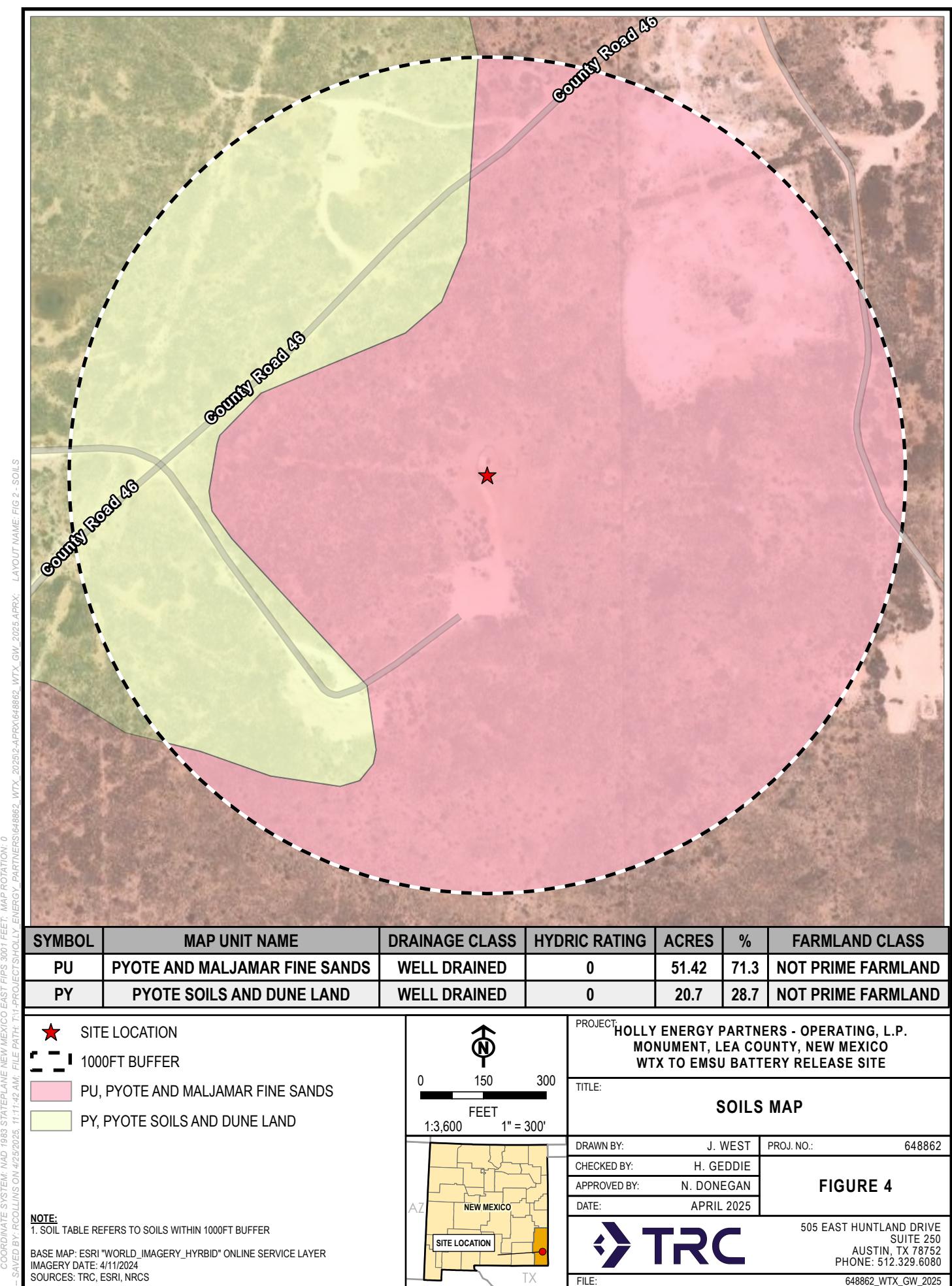
**FIGURE 2**

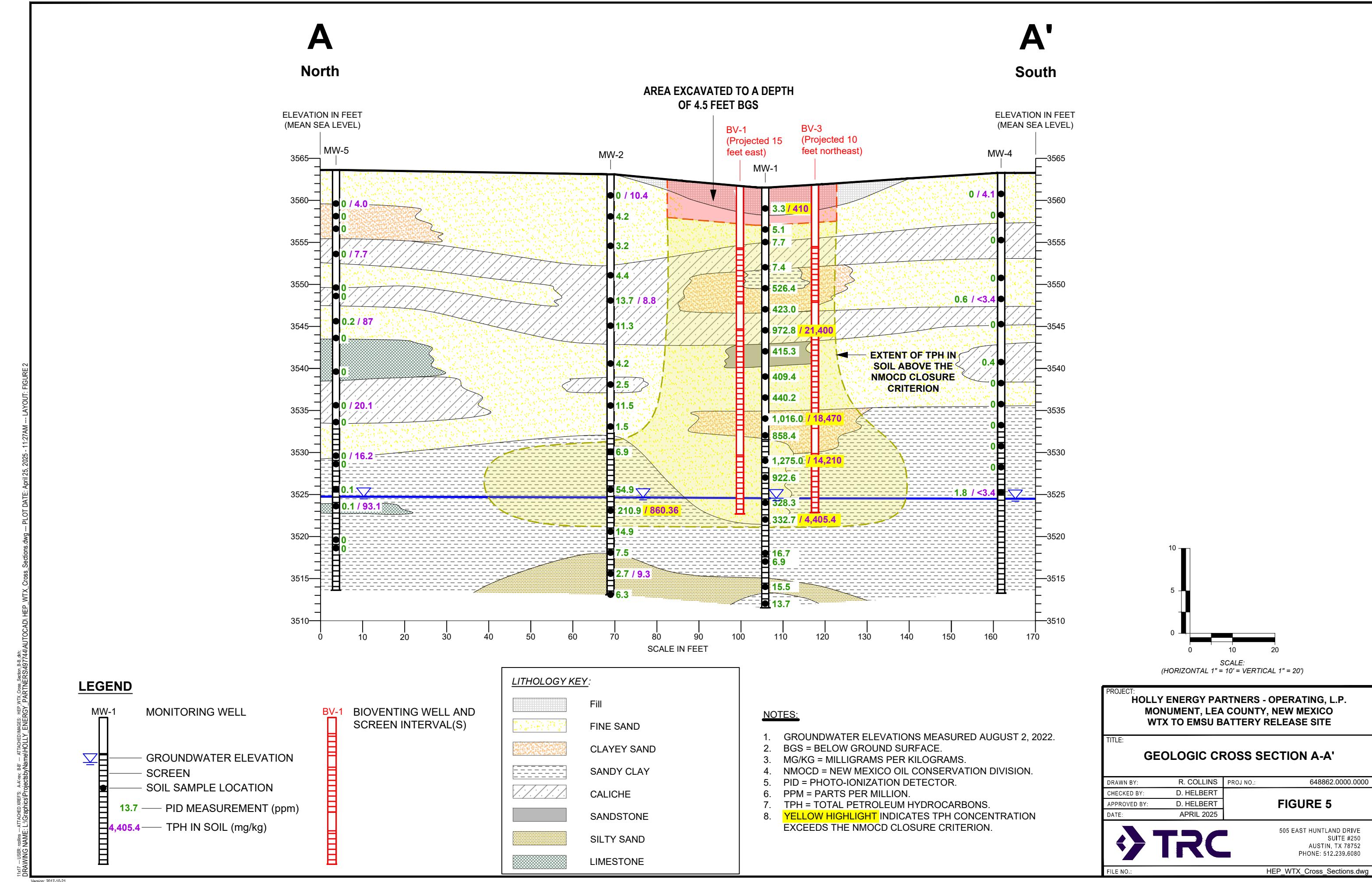
505 EAST HUNTLAND DRIVE, SUITE 250  
 AUSTIN, TX 78752  
 PHONE: 512.329.6080  
 WWW.TRCSOLUTIONS.COM

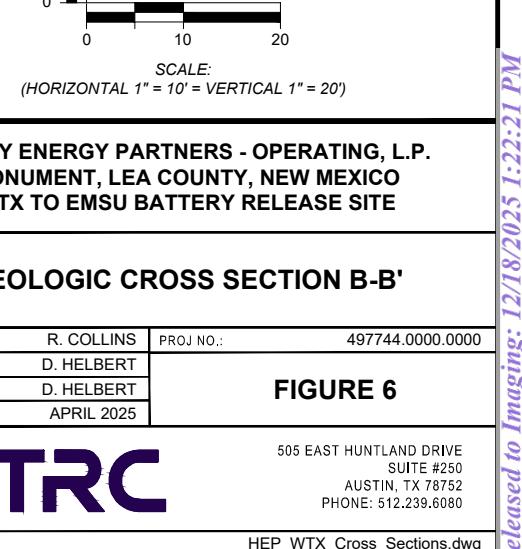
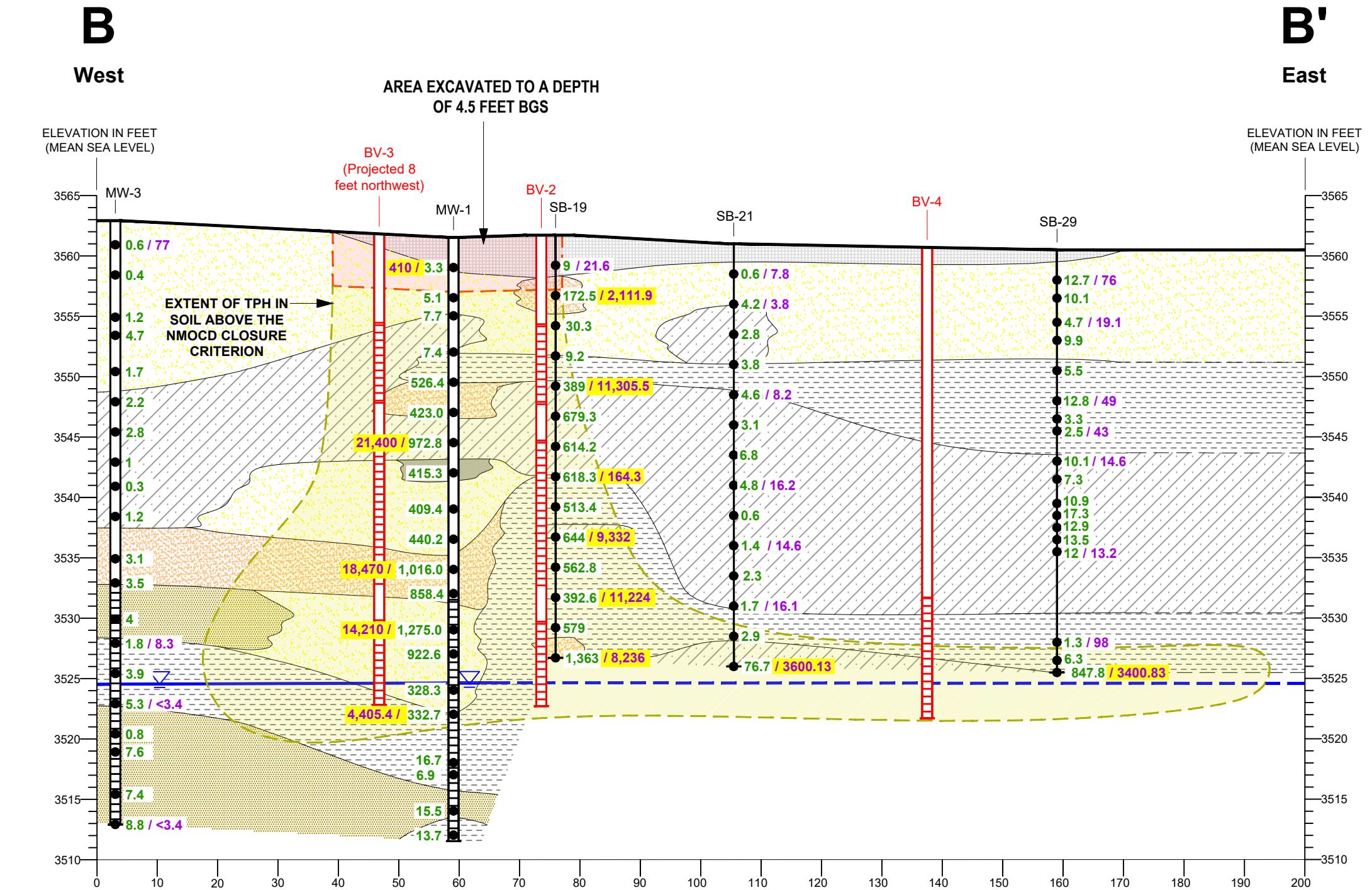
FILE NO.: 648862\_2\_NEWMXD











11x17 --- USER: rollins --- ATTACHED XREFS: A-A' rev, B-B' --- ATTACHED IMAGES: HEP\_WTX\_Cross\_Section\_B-E

VERSION: 2017-10-2

## LEGEND

BV-3 BIOVENTING WELL A  
SCREEN INTERVAL(S)

### LITHOLOGY KE

	FILL
	FINE SAND
	CLAYEY SAND
	SANDY CLAY
	CALICHE
	SANDSTONE
	SILTY SAND

NOT

1. GROUNDWATER ELEVATIONS MEASURED AUGUST 2, 2022.
2. BGS = BELOW GROUND SURFACE.
3. MG/KG = MILLIGRAMS PER KILOGRAMS.
4. NMOC'D = NEW MEXICO OIL CONSERVATION DIVISION.
5. PID = PHOTO-IONIZATION DETECTOR.
6. PPM = PARTS PER MILLION.
7. TPH = TOTAL PETROLEUM HYDROCARBONS.
8. **YELLOW HIGHLIGHT** INDICATES TPH CONCENTRATION EXCEEDS THE NMOC'D CLOSURE CRITERION.

JECT:  
**HOLLY ENERGY PARTNERS - OPERATING, L.P.**  
**MONUMENT, LEA COUNTY, NEW MEXICO**  
**WTY TO EMSL BATTERY RELEASE SITE**

15

### GEOLOGIC CROSS SECTION B-B'

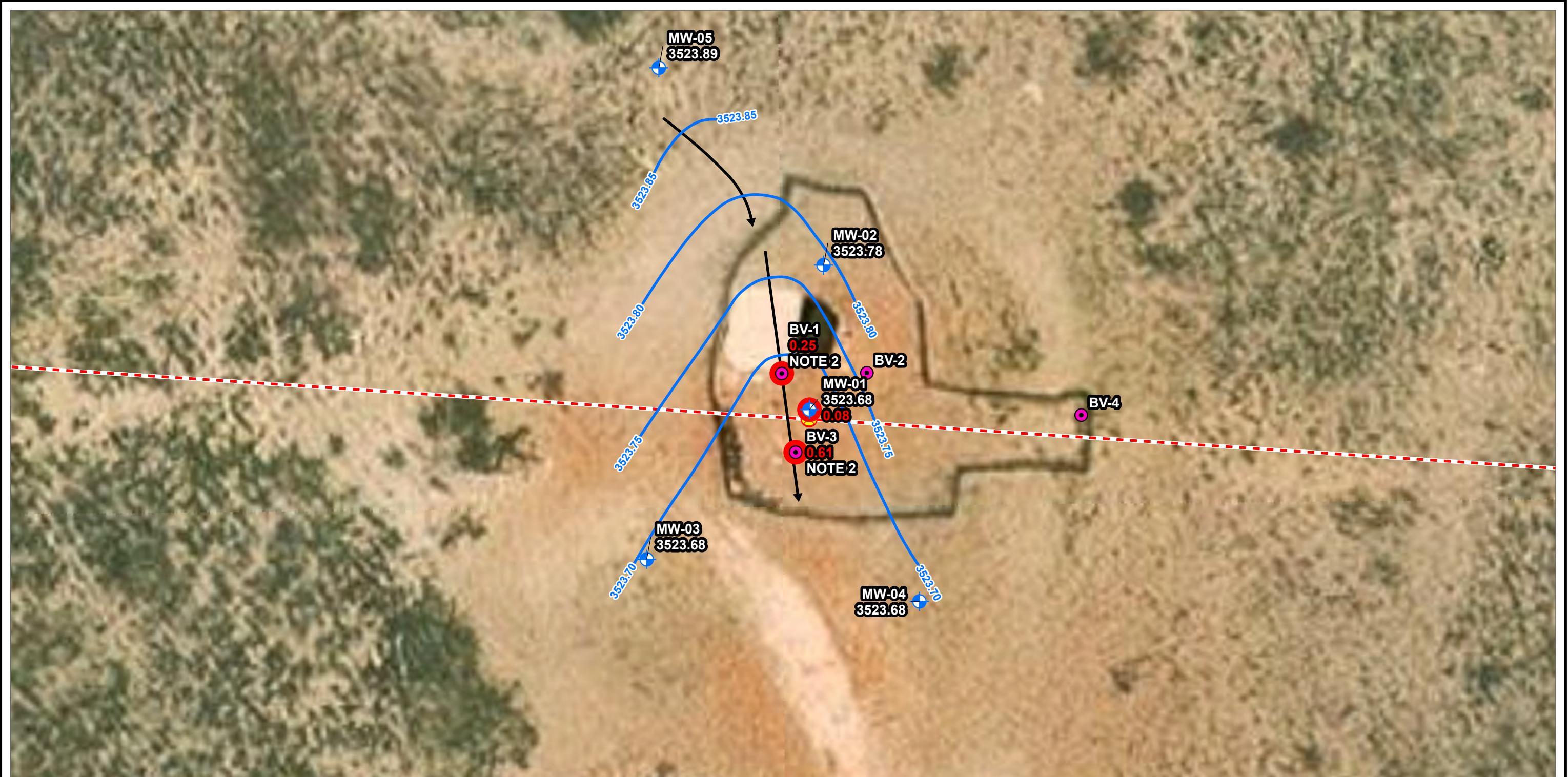
AWN BY:	R. COLLINS	PROJ NO.:	497744.0000.0000
CKED BY:	D. HELBERT		
PROVED BY:	D. HELBERT		
TE:	APRIL 2025		

 TRC

5 EAST HUNTLAND DRIVE  
SUITE #250  
AUSTIN, TX 78752  
PHONE: 512.239.6080

---

HEP WTX Cross Sections.dwg



Coordinate System: NAD 1983 2011 StatePlane New Mexico East FIPS 3001 Ft US; Map Rotation: 0  
-- Saved By: RCOULLINS on 4/25/2025, 11:14:44 AM; File Path: T:\PROJECTS\HOLLY ENERGY PARTNERS\648862\_WTX\_GW\_2025.aprx;

LEGEND	
	MONITORING WELL
	6" GATHERING LINE
	BIOVENTING WELL LOCATION
	RELEASE LOCATION
	GROUNDWATER FLOW DIRECTION
	POTENTIOMETRIC CONTOUR (DASHED WHERE INFERRED)
	LNAPL PRESENT

**0.08** APPARENT LNAPL THICKNESS  
**3523.89** GROUNDWATER ELEVATION (FEET ABOVE MEAN SEA LEVEL)

NOTES:  
1. BIOVENTING WELLS NOT USED FOR POTENTIOMETRIC SURFACE CONTOURS.  
2. LNAPL PRESENT IN DEEP SCREENED INTERVAL.

BASE MAP: ESRI "WORLD\_IMAGERY\_HYBRID" ONLINE SERVICE LAYER  
IMAGERY DATE: 4/11/2024  
SOURCES: TRC, ESRI

0 12.5 25 FEET  
1:300 1" = 25'



PROJECT: HOLLY ENERGY PARTNERS - OPERATING, L.P.  
MONUMENT, LEA COUNTY, NEW MEXICO  
WTX TO EMSU BATTERY RELEASE SITE

TITLE: GROUNDWATER POTENTIOMETRIC SURFACE MAP  
NOVEMBER 2024

DRAWN BY: J. WEST PROJ. NO.: 648862.0000.0000

CHECKED BY: D. CLARK

APPROVED BY: D. CLARK

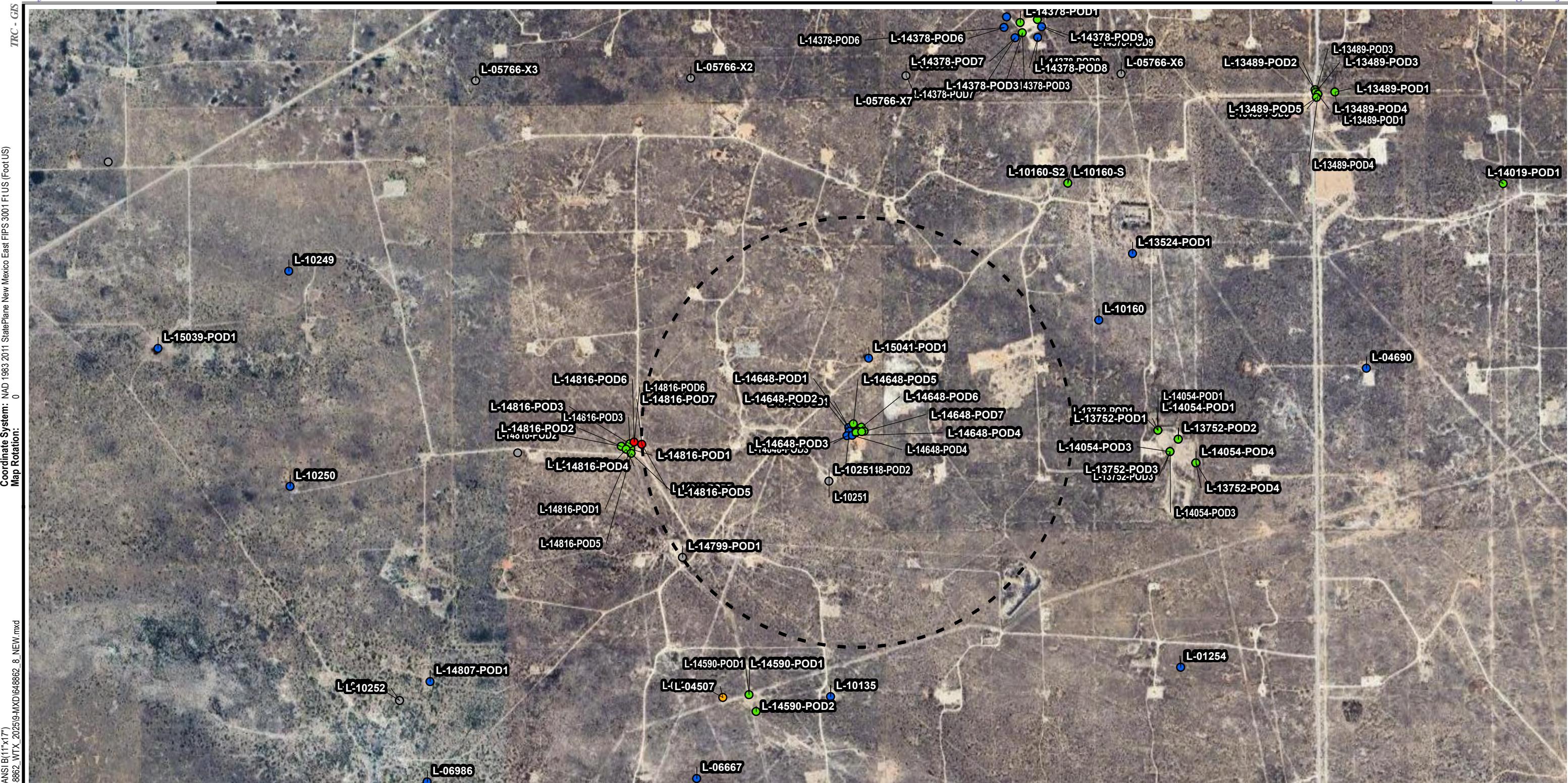
DATE: APRIL 2025

505 EAST HUNTLAND DRIVE  
SUITE #250  
AUSTIN, TX 78752  
PHONE: 512.329.6080



FILE: 648862\_WTX\_GW\_2025.aprx

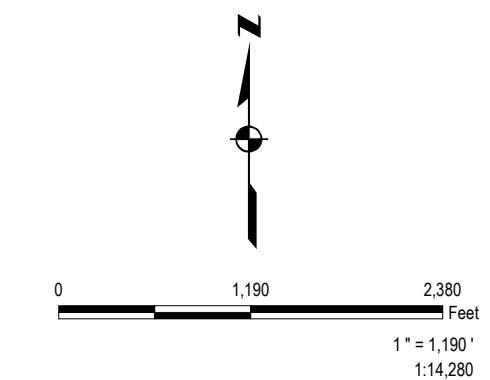
FIGURE 7



SOURCE: FLOODPLAIN - FEMA FLOOD MAP SERVICE CENTER (MSC); AERIAL IMAGERY - GOOGLE EARTH SATELLITE IMAGERY (1/4/2023)

NOTES:

1. NO 100 YEAR FLOOD PLAINS IDENTIFIED WITHIN APPXIMATELY 310 SQUARE MILES OF SITE LOCATION.
2. OSE PODs REPRESENT WATER WELLS AND GROUNDWATER RIGHTS THAT HAVE BEEN REGISTERED WITH THE OSE.



PROJECT: HOLLY ENERGY PARTNERS - OPERATING, L.P.  
MONUMENT, LEA COUNTY, NEW MEXICO  
WTX TO EMSU BATTERY RELEASE SITE

TITLE: FLOODPLAIN  
AND WELLHEAD PROTECTION  
AREA MAP

DRAWN BY:	R. COLLINS	PROJ NO.:	648862.0000.0000
CHECKED BY:	B. GILBERT		
APPROVED BY:	B. GILBERT		
DATE:	APRIL 2025		

505 East Huntland Drive  
Suite #250  
Austin, TX 78752  
Phone: 512.329.6080



FILE NO.: 648862\_8\_NEW.mxd

Page 34 of 167

**LEGEND**

-  RELEASE LOCATION
-  200 FOOT RADIUS ((SEE CLOSURE CRITERIA MODIFIER 1))
-  300 FOOT RADIUS (SEE CLOSURE CRITERIA MODIFIER 2)
-  500 FOOT RADIUS (SEE CLOSURE CRITERIA MODIFIER 3)
-  1000 FOOT RADIUS (SEE CLOSURE CRITERIA MODIFIER 4)

SOURCE: BASEMAP FROM GOOGLE EARTH PRO AND THEIR DATA PARTNERS (1/4/2023).

**CLOSURE CRITERIA MODIFIERS**

1. WITHIN 200 FEET OF ANY LAKEBED, SINKHOLE, OR PLAYA LAKE (MEASURED FROM THE ORDINARY HIGH-WATER MARK).
2. WITHIN 300 FEET OF ANY CONTINUOUSLY FLOWING WATERCOURSE OR ANY OTHER SIGNIFICANT WATERCOURSE; OR FROM AN OCCUPIED PERMANENT RESIDENCE, SCHOOL, HOSPITAL OR CHURCH.
3. WITHIN 500 FEET OF A SPRING OR A PRIVATE, DOMESTIC FRESH WATER WELL USED BY LESS THAN FIVE HOUSEHOLDS FOR DOMESTIC OR STOCK WATERING PURPOSES.
4. WITHIN 1,000 FEET OF ANY FRESH WATER WELL OR SPRING.



PROJECT: **HOLLY ENERGY PARTNERS - OPERATING, L.P.**  
**MONUMENT, LEA COUNTY, NEW MEXICO**  
**WTX TO EMSU BATTERY RELEASE SITE**

TITLE:

**CLOSURE CRITERIA MODIFIERS**

DRAWN BY:	R. COLLINS	PROJ NO.:	648862.0000.0000
CHECKED BY:	B. GILBERT		
APPROVED BY:	B. GILBERT		
DATE:	APRIL 2025		

**FIGURE 9**

505 East Huntland Drive  
Suite #250  
Austin, TX 78752  
Phone: 512.329.6080

648862\_9\_NEW.mxd



## TABLES

TABLE 1: SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS  
WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM

Location Details	Boring ID	Depth Interval (feet bgs)	Sample Date	Constituent of Concern (COC)								Chloride <sup>4</sup> (mg/kg)		
				BTEX (mg/kg)				TPH (mg/kg)						
				Benzene	Ethyl-benzene	Toluene	Total Xylenes	Total BTEX <sup>2</sup>	GRO	DRO	MRO	TPH <sup>3</sup>		
NMOC Closure Criteria <sup>1</sup>				10	None	None	None	50	None	None	None	100	600	
SOURCE AREA	SB-1 (GHD)	(4-5')	9/28/2018	<0.00210	<0.00210	<0.00210	<0.00210	<0.00210	<15.7	<15.7	<15.7	<15.7	<5.22	
		(20-21')	9/28/2018	<0.00271	<0.00271	<0.00271	<0.00271	<0.00271	<20.4	22.7	<20.4	22.7	625	
		(34-35')	9/28/2018	<0.00242	0.00418	<0.00242	0.0166	0.0208	34.1	1030	178	1,242.1	77.9	
	SB-05 (MW-1)	(2.5-3')	11/3/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.050	120	290	410	5.91	
		(16.5-17')	11/3/2020	<0.0048	0.16	0.0097	0.5	0.6697	200	13000	8200	21,400	148	
		(27.5-28')	11/3/2020	<0.0050	0.13	<0.0050	0.18	0.31	170	11000	7300	18,470	<4.98	
		(32.5-33')	11/3/2020	<0.0050	0.16	<0.0050	0.55	0.71	110	8000	6100	14,210	14.0	
		(39-40')	11/3/2020	<0.0048	0.047	<0.0048	0.042	0.089	5.4	2400	2000	4,405.4	60.6	
LATERAL DELINEATION	North	SB-06 (MW-2)	(2.5-3')	11/4/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.050	3.6	6.8	10.4	<4.91
			(14.5-15')	11/4/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.052	3.5	5.3	8.8	386
			(39.5-40')	11/4/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	0.3	400	390	790.3	98.1
			Duplicate-01	11/4/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.36	390	470	860.36	95.5
			(47.5-48')	11/4/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.048	4.2	5.1	9.3	166
	SB-14	1.5' (16-18")	11/6/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	16	9100	8000	17,116	<4.99	
		4' (46-48")	11/6/2020	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	13	5500	4700	10,213	<5.00	
	SB-19 (Adjacent to SB-14)	Duplicate-02	11/6/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	7.4	4700	4300	9,007.4	<5.00	
		1.5' (13-20")	11/6/2020	<0.0055	<0.0055	<0.0055	<0.0055	<0.0055	<0.053	2.6	6.2	8.8	<4.98	
		4' (44-46")	11/6/2020	<0.0052	<0.0052	<0.0052	<0.0052	<0.0052	<0.054	<1.7	5.1	5.1	<4.95	
		(2-3')	5/27/2021	NA	NA	NA	NA	NA	<0.052	5.6	16	21.6	NA	
		(4-5')	5/27/2021	NA	NA	NA	NA	NA	1.9	910	1200	2,111.9	NA	
		(11-12')	5/27/2021	NA	NA	NA	NA	NA	5.5	5700	5600	11,305.5	NA	
		(19-20')	5/27/2021	NA	NA	NA	NA	NA	7.3	79	78	164.3	NA	
		(24-25')	5/27/2021	NA	NA	NA	NA	NA	32	4900	4400	9,332	NA	
		(29-30')	5/27/2021	NA	NA	NA	NA	NA	24	6100	5100	11,224	NA	
		(34-35')	5/27/2021	NA	NA	NA	NA	NA	56	3100	2800	5,956	NA	
		Dup-02	5/27/2021*	NA	NA	NA	NA	NA	36	4400	3800	8,236	NA	
Northeast	SB-19A	2-3	8/15/2022	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	NA	NA	NA	NA	NA	
		4-5	8/15/2022	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	NA	NA	NA	NA	NA	
		11-12	8/15/2022	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	NA	NA	NA	NA	NA	
		19-20	8/15/2022	<0.0050	0.14	<0.0050	0.11	0.25	NA	NA	NA	NA	NA	
		24-25	8/15/2022	<0.0048	0.037	<0.0048	0.048	0.085	NA	NA	NA	NA	NA	
		29-30	8/15/2022	<0.0049	0.091	<0.0049	0.099	0.190	NA	NA	NA	NA	NA	
		Duplicate-1 [29-30']	8/15/2022	<0.0050	0.064	<0.0050	0.070	0.134	NA	NA	NA	NA	NA	
		34-35	8/15/2022	<0.0049	0.033	<0.0049	0.059	0.092	NA	NA	NA	NA	NA	
	SB-30	(1-2')	10/6/2021	NA	NA	NA	NA	NA	<0.052	4.5	9.4	13.9	NA	
		(5-6')	10/6/2021	NA	NA	NA	NA	NA	<0.049	7.9	14	21.9	NA	
		(11-12')	10/6/2021	NA	NA	NA	NA	NA	<0.048	41	12	53	NA	
		(14-15')	10/6/2021	NA	NA	NA	NA	NA	<0.050	17	60	77	NA	
		(19-20')	10/6/2021	NA	NA	NA	NA	NA	<0.048	29	7.4	36.4	NA	
		(25-26')	10/6/2021	NA	NA	NA	NA	NA	<0.054	14	6.4	20.4	NA	
		(29-30')	10/6/2021	NA	NA	NA	NA	NA	<0.050	6.6	8.7	15.3	NA	
		(34-35')	10/6/2021	NA	NA	NA	NA	NA	<0.051	6.9	23	29.9	NA	
East	SB-3 (GHD)	(4-5')	9/28/2018	<0.00231	<0.00231	<0.00231	<0.00231	<0.00231	<17.4	<17.4	<17.4	<17.4	<5.76	
		(24-25')	9/28/2018	<0.00217	<0.00217	<0.00217	<0.00217	<0.00217	<16.4	<16.4	<16.4	<16.4	37.8	
	SB-09	2' (24-26")	11/6/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.052	480	1400	1,880	<4.96	
		4' (46-48")	11/6/2020	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.054	100	700	800	<4.97	
	SB-10	3' (36-38")	11/6/2020	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.050	<1.7	<3.4	<3.4	<4.99	
	SB-21	(2-3')	5/27/2021	NA	NA	NA	NA	NA	<0.054	7.8	<3.4	7.8	NA	
		(4-5')	5/27/2021	NA	NA	NA	NA	NA	<0.049	<1.7	3.8	3.8	NA	
		(11-12')	5/27/2021	NA	NA	NA	NA	NA	<0.056	3.2	5.0	8.2	NA	
		(19-20')	5/27/2021	NA	NA	NA	NA	NA	<0.050	5.2	11	16.2	NA	
		(24-25')	5/27/2021	NA	NA	NA	NA	NA	<0.054	7.9	6.7	14.6	NA	
		(29-30')	5/27/2021	NA	NA	NA	NA	NA	<0.054	6.8	9.3	16.1	NA	
	SB-23	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	

TABLE 1: SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS  
WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM

Location Details	Boring ID	Depth Interval (feet bgs)	Sample Date	Constituent of Concern (COC)								Chloride <sup>4</sup> (mg/kg)	
				BTEX (mg/kg)				TPH (mg/kg)					
				Benzene	Ethyl-benzene	Toluene	Total Xylenes	Total BTEX <sup>2</sup>	GRO	DRO	MRO	TPH <sup>3</sup>	
NMOC Closure Criteria <sup>1</sup>				10	None	None	None	50	None	None	None	100	600
East	SB-29	(1-2')	10/5/2021	NA	NA	NA	NA	NA	<0.048	20	56	76	NA
		(5-6')	10/5/2021	NA	NA	NA	NA	NA	<0.050	9.1	10	19.1	NA
		(11-12')	10/5/2021	NA	NA	NA	NA	NA	<0.054	32	17	49	NA
		(14-15')	10/5/2021	NA	NA	NA	NA	NA	<0.050	12	31	43	NA
		(17-18')	10/5/2021	NA	NA	NA	NA	NA	<0.050	7.7	6.9	14.6	NA
		(25-26')	10/5/2021	NA	NA	NA	NA	NA	<0.048	6.7	6.5	13.2	NA
		(29-30')	10/5/2021	NA	NA	NA	NA	NA	<0.052	35	63	98	NA
		(34-35')	10/7/2021	NA	NA	NA	NA	NA	0.83	1,300	2,100	3,400.83	NA
	DUP-02	10/7/2021	NA	NA	NA	NA	NA	NA	2.5	2,200	3,700	5,902.5	NA
Southeast	SB-31	(3-4')	10/7/2021	NA	NA	NA	NA	NA	<0.051	41	41	82	NA
		DUP-03	10/7/2021	NA	NA	NA	NA	NA	<0.051	17	40	57	NA
		(5-6')	10/7/2021	NA	NA	NA	NA	NA	<0.056	82	45	127	NA
		(9-10')	10/7/2021	NA	NA	NA	NA	NA	<0.056	6.8	13	19.8	NA
		(16-17')	10/7/2021	NA	NA	NA	NA	NA	<0.048	3.3	6.7	10	NA
		(19-20')	10/7/2021	NA	NA	NA	NA	NA	<0.049	12	29	41	NA
		(23-24')	10/8/2021	NA	NA	NA	NA	NA	<0.052	3.9	6.7	10.6	NA
		(25-26')	10/8/2021	NA	NA	NA	NA	NA	<0.056	35	13	48	NA
		(30-31')	10/8/2021	NA	NA	NA	NA	NA	<0.052	7.1	6.2	13.3	NA
		(34-35')	10/8/2021	NA	NA	NA	NA	NA	<0.052	21	6.7	27.7	NA
LATERAL DELINEATION	SB-08 (MW-4)	(2-2.5')	11/5/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.050	<1.7	4.1	4.1	<4.99
		(14.5-15')	11/5/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.054	<1.7	<3.4	<3.4	268
		(39.5-40')	11/5/2020	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.051	<1.7	<3.4	<3.4	73.2
	SB-24	(2')	5/24/2021	NA	NA	NA	NA	NA	<0.052	6.2	33	39.2	NA
		(4')	5/24/2021	NA	NA	NA	NA	NA	<0.050	<1.7	3.6	3.6	NA
	SB-2 (GHD)	(4-5')	9/28/2018	<0.00215	<0.00215	<0.00215	<0.00215	<0.00215	<16.0	<16.0	<16.0	<16.0	<5.34
		(10-11')	9/28/2018	<0.00225	<0.00225	<0.00225	<0.00225	<0.00225	<16.8	<16.8	<16.8	<16.8	381
		(34-35')	9/28/2018	<0.00238	<0.00238	<0.00238	<0.00238	<0.00238	<17.8	<17.8	<17.8	<17.8	84.2
		2' (24-26")	11/6/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.054	<1.7	12	12	<5.00
	SB-15	4' (46-48")	11/6/2020	<0.0049	<0.0049	<0.0049	<0.0049	<0.0049	<0.050	<1.7	11	11	<4.97
		(2-3')	5/28/2021	NA	NA	NA	NA	NA	<0.052	19	15	34	NA
		(4-5')	5/28/2021	NA	NA	NA	NA	NA	<0.052	<1.7	9.3	9.3	NA
		(9-10')	5/28/2021	NA	NA	NA	NA	NA	<0.053	2.4	5.1	7.5	NA
		(14-15')	5/28/2021	NA	NA	NA	NA	NA	<0.052	11	16	27	NA
		(21-22')	5/28/2021	NA	NA	NA	NA	NA	<0.054	<1.7	<3.4	<3.4	NA
		(29-30')	5/28/2021	NA	NA	NA	NA	NA	<0.047	<1.7	<3.4	<3.4	NA
		(34-35')	5/28/2021	NA	NA	NA	NA	NA	<0.054	<1.7	<3.4	<3.4	NA
Southwest	SB-07 (MW-3)	(2-2.5')	11/4/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.052	52	25	77	6.57
		(34.5-35')	11/4/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.051	4.1	4.2	8.3	402
		(39.5-40')	11/4/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.054	<1.7	<3.4	<3.4	105
		(49-50')	11/4/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.048	<1.7	<3.4	<3.4	114
	SB-28	(2')	5/28/2021	NA	NA	NA	NA	NA	<0.050	2.4	4.4	6.8	NA
		(3.5')	5/28/2021	NA	NA	NA	NA	NA	<0.050	<1.7	6.6	6.6	NA
West	SB-4 (GHD)	(4-5')	9/28/2018	<0.00219	<0.00219	<0.00219	<0.00219	<0.00219	<16.2	<16.2	<16.2	<16.2	<5.46
		(24-25')	9/28/2018	<0.00226	<0.00226	<0.00226	<0.00226	<0.00226	<16.9	<16.9	<16.9	<16.9	513
		(34-35')	9/28/2018	<0.00236	<0.00236	<0.00236	<0.00236	<0.00236	<17.7	<17.7	<17.7	<17.7	262
	SB-11	2' (24-26")	11/6/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.050	5.2	28	33.2	<4.99
		3.5' (40-43")	11/6/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.052	44	110	154	<4.97
	SB-12	4' (46-48")	11/6/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.048	<1.7	5.3	5.3	<5.00
	SB-20	(2-3')	5/27/2021	NA	NA	NA	NA	NA	<0.051	15	11	26	NA
		(4-5')	5/27/2021	NA	NA	NA	NA	NA	<0.056	17	4.5	21.5	NA
		(9-10')	5/27/2021	NA	NA	NA	NA	NA	<0.052	9.7	5.5	15.2	NA
		(14-15')	5/27/2021	NA	NA	NA	NA	NA	<0.052	12	<3.4	12	NA
		(19-20')	5/27/2021	NA	NA	NA	NA	NA	<0.058	7.7	7.0	14.7	NA
		(24-25')	5/27/2021	NA	NA	NA	NA	NA	<0.055	5.3	13	18.3	NA
		(29-30')	5/27/2021	NA	NA	NA	NA	NA	<0.049	<1.7	<3.4	<3.4	NA
	SB-22	4-4.5'	5/24/2021	NA	NA	NA	NA	NA	<0.044	<1.7	4.4	4.4	NA

TABLE 1: SUMMARY OF SOIL SAMPLE ANALYTICAL RESULTS  
WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM

Location Details	Boring ID	Depth Interval (feet bgs)	Sample Date	Constituent of Concern (COC)								Chloride <sup>4</sup> (mg/kg)	
				BTEX (mg/kg)				TPH (mg/kg)					
				Benzene	Ethyl-benzene	Toluene	Total Xylenes	Total BTEX <sup>2</sup>	GRO	DRO	MRO	TPH <sup>3</sup>	
NMOCD Closure Criteria <sup>1</sup>				10	None	None	None	50	None	None	None	100	600
LATERAL DELINEATION	SB-13	1.5' (16-18")	11/6/2020	<0.0048	<0.0048	<0.0048	<0.0048	<0.0048	<0.052	740	2,100	2,840	<5.00
		3.5' (38-40")	11/6/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.054	87	530	617	<4.97
	SB-18 (Adjacent to SB-13)	(2-3')	5/26/2021	NA	NA	NA	NA	NA	0.064	12	49	61.064	NA
		(4-5')	5/26/2021	NA	NA	NA	NA	NA	0.087	240	1,400	1,640.087	NA
		(9-10')	5/26/2021	NA	NA	NA	NA	NA	0.080	170	670	840.08	NA
		(14-15')	5/26/2021	NA	NA	NA	NA	NA	34	6,600	5,500	12,134	NA
		Dup-01	5/26/2021	NA	NA	NA	NA	NA	26	5,700	4,500	10,226	NA
		(19-20')	5/26/2021	NA	NA	NA	NA	NA	130	2,300	2,700	5,130	NA
		(24-25')	5/27/2021	NA	NA	NA	NA	NA	29	2,600	2,400	5,029	NA
		(26-27')	5/27/2021	NA	NA	NA	NA	NA	14	4,000	4,100	8,114	NA
		(29-30')	5/27/2021	NA	NA	NA	NA	NA	18	5,400	5,100	10,518	NA
	SB-25 (MW-5)	(2-3')	5/26/2021	NA	NA	NA	NA	<0.052	<1.7	4.0	4.0	<4.96	NA
		(11-12')	5/26/2021	NA	NA	NA	NA	<0.046	<1.7	7.7	7.7	89.7	NA
		(16-17')	5/26/2021	NA	NA	NA	NA	<0.052	76	11	87	194	NA
		(26-27')	5/26/2021	NA	NA	NA	NA	<0.048	13	7.1	20.1	301	NA
		(34-35')	5/26/2021	NA	NA	NA	NA	<0.046	5.2	11	16.2	63.9	NA
		(39-40')	5/26/2021	NA	NA	NA	NA	<0.058	88	5.1	93.1	151	NA
		Dup-03	5/26/2021	NA	NA	NA	NA	<0.050	2.8	4.4	7.2	190	NA
	SB-27	(2')	5/28/2021	NA	NA	NA	NA	<0.051	2.2	3.4	5.6	NA	NA
		(3.5')	5/28/2021	NA	NA	NA	NA	<0.054	1.8	<3.4	1.8	NA	NA
EXCAVATION	Sidewall	CS-SW-1@2.25'	2.25	8/18/2022	NA	NA	NA	NA	<0.049	16	28	44	NA
		CS-SW-2@2.25'	2.25	8/18/2022	NA	NA	NA	NA	<0.049	2.5	6.3	8.8	NA
		CS-SW-3@2.25'	2.25	8/18/2022	NA	NA	NA	NA	<0.048	190	1,200	1,390	NA
		CS-SW-3a@2.25'	2.25	8/25/2022	NA	NA	NA	NA	<0.050	2.3	5.8	8.1	NA
		CS-SW-4@2.25'	2.25	8/18/2022	NA	NA	NA	NA	<0.050	3.5	5.9	9.4	NA
	Floor	CS-1@4.5'	4.5	8/18/2022	NA	NA	NA	NA	<0.049	800	2,300	3,100	NA
		CS-2@4.5'	4.5	8/18/2022	NA	NA	NA	NA	<0.050	330	1,600	1,930	NA
		Duplicate-1 [CS-2@4.5']	4.5	8/18/2022	NA	NA	NA	NA	<0.050	340	1,700	2,040	NA
		CS-3@4.5'	4.5	8/18/2022	NA	NA	NA	NA	<0.048	650	1,700	2,350	NA
		CS-4@4.5'	4.5	8/18/2022	NA	NA	NA	NA	<0.050	21	64	85	NA
		CS-5@4.5'	4.5	8/18/2022	NA	NA	NA	NA	<0.050	15	5,500	6,300	11,815
		CS-6@4.5'	4.5	8/25/2022	NA	NA	NA	NA	<0.050	690	1,800	2,490	NA
		CS-7@4.5'	4.5	8/25/2022	NA	NA	NA	NA	<0.050	4.7	7.3	12.0	NA

## Notes:

bgs below ground surface

BTEX Benzene, Toluene, Ethylbenzene, and Total Xylenes. TRC samples analyzed by EPA Method 8260; GHD samples analyzed by EPA Method 8021b.

COC constituent of concern

DRO Diesel Range Organics

GRO Gasoline Range Organics

MRO Motor Oil Range Organics

mg/kg milligrams per kilogram

NA Not Analyzed

NMOCD New Mexico Oil Conservation District

TPH Total Petroleum Hydrocarbons by EPA Method 8015

' feet

&lt; COC not detected above reporting limit

**Bold** Detected concentration

Blue Soil excavated and removed

**Gold** Concentration exceeds selected NMOCD Closure Criteria

1 Closure Criteria provided for sites with groundwater at a depth of less than 50 feet bgs

2 Total BTEX is the sum of the benzene + toluene + ethylbenzene + total xylenes concentrations

3 TPH is the sum of the GRO + DRO + MRO concentrations

4 Chloride analyzed by EPA Method 300.0

**TABLE 2**  
**SUMMARY OF QUARTERLY MONITORING EVENT GROUNDWATER ELEVATIONS**  
**WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM**

Monitor Well ID	Well Total Depth (feet btoc)	Ground Surface at Well Elevation (feet amsl)	Well Top of Casing Elevation (feet amsl)	Screened Interval (feet btoc)	Gauging Date	Depth to LNAPL (feet btoc)	Depth to Water (feet btoc)	LNAPL Thickness (feet)	Corrected Depth to Water (feet btoc)	Corrected Groundwater Elevation (feet amsl)	Well Saturated Thickness (feet)
<b>MW-01</b>	49.25	3,561.71	3,561.53	29.00 - 49.00	11/07/20 05/28/21 10/12/21 08/16/22 12/20/22 02/22/23 06/20/23 09/14/23 10/17/23 12/13/23 03/07/24 05/08/24 08/27/24 11/21/24 03/10/25	ND ND ND ND ND ND ND 37.46 37.51 37.56 37.54 37.58 ND 37.84 37.85	36.29 36.47 36.67 37.08 37.25 37.26 37.32 37.48 37.52 37.57 37.55 37.59 37.78 37.92 37.92	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.02 0.01 0.01 0.01 0.01 0.00 0.08 0.07	36.29 36.47 36.67 37.08 37.25 37.26 37.32 37.46 37.51 37.56 37.54 37.58 37.78 37.85 37.86	3,525.24 3,525.06 3,524.86 3,524.45 3,524.28 3,524.27 3,524.21 3,524.07 3,524.02 3,523.97 3,523.99 3,523.95 3,523.75 3,523.68 3,523.67	12.96 12.78 12.58 12.17 12.00 11.99 11.93 11.79 11.74 11.69 11.71 11.67 11.47 11.40 11.39
<b>MW-02</b>	49.49	3,563.09	3,562.94	29.24 - 49.24	11/07/20 05/25/21 10/06/21 08/16/22 12/20/22 02/22/23 06/20/23 09/14/23 10/17/23 12/13/23 03/07/24 05/08/24 08/26/24 11/21/24 03/10/25	ND ND ND ND ND ND ND ND ND ND ND ND ND ND ND ND	37.59 37.81 37.95 38.35 38.53 38.54 38.58 38.75 37.79 38.83 38.83 38.87 39.03 39.16 39.16	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	37.59 37.81 37.95 38.35 38.53 38.54 38.58 38.75 37.79 38.83 38.83 38.87 39.03 39.16 39.16	3,525.35 3,525.13 3,524.99 3,524.59 3,524.41 3,524.40 3,524.36 3,524.19 3,525.15 3,524.11 3,524.11 3,524.07 3,523.91 3,523.78 3,523.78	11.90 11.68 11.54 11.14 10.96 10.95 10.91 10.74 11.70 10.66 10.66 10.62 10.46 10.33 10.33
<b>MW-03</b>	49.93	3,562.91	3,562.81	29.68 - 49.68	11/07/20 05/25/21 10/12/21 08/16/22 12/20/22 02/22/23 06/20/23 09/14/23 10/17/23 12/13/23 03/07/24 05/08/24 08/26/24 11/21/24 03/10/25	ND ND ND ND ND ND ND ND ND ND ND ND ND ND ND	37.58 37.79 37.99 38.31 38.49 38.51 38.56 38.71 37.73 38.81 38.80 38.83 39.00 39.13 39.14	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	37.58 37.79 37.99 38.31 38.49 38.51 38.56 38.71 37.73 38.81 38.80 38.83 39.00 39.13 39.14	3,525.23 3,525.02 3,524.82 3,524.50 3,524.32 3,524.30 3,524.25 3,524.10 3,525.08 3,524.00 3,524.01 3,523.98 3,523.81 3,523.68 3,523.67	12.35 12.14 11.94 11.62 11.44 11.42 11.37 11.22 12.20 11.12 11.13 11.10 10.93 10.80 10.79
<b>MW-04</b>	50.31	3,563.26	3,563.12	30.06 - 50.06	11/07/20 05/25/21 10/06/21 08/16/22 12/20/22 02/22/23 06/20/23 09/14/23 10/17/23 12/13/23 03/07/24 05/08/24 08/26/24 11/21/24 03/10/25	ND ND ND ND ND ND ND ND ND ND ND ND ND ND ND	37.92 38.12 38.28 38.64 38.82 38.85 38.91 39.05 38.08 39.14 39.12 39.17 39.35 39.44 39.45	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	37.92 38.12 38.28 38.64 38.82 38.85 38.91 39.05 38.08 39.14 39.12 39.17 39.35 39.44 39.45	3,525.20 3,525.00 3,524.84 3,524.48 3,524.30 3,524.27 3,524.21 3,524.07 3,525.04 3,523.98 3,524.00 3,523.95 3,523.77 3,523.68 3,523.67	12.39 12.19 12.03 11.67 11.49 11.46 11.4 11.26 12.23 11.17 11.19 11.14 10.96 10.87 10.86

**TABLE 2**  
**SUMMARY OF QUARTERLY MONITORING EVENT GROUNDWATER ELEVATIONS**  
**WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM**

Monitor Well ID	Well Total Depth (feet btoc)	Ground Surface at Well Elevation (feet amsl)	Well Top of Casing Elevation (feet amsl)	Screened Interval (feet btoc)	Gauging Date	Depth to LNAPL (feet btoc)	Depth to Water (feet btoc)	LNAPL Thickness (feet)	Corrected Depth to Water (feet btoc)	Corrected Groundwater Elevation (feet amsl)	Well Saturated Thickness (feet)
<b>MW-05</b>	49.72	3,563.62	3,563.40	29.47 - 49.47	05/28/21	ND	38.15	0.00	38.15	3,525.25	11.57
					10/12/21	ND	38.34	0.00	38.34	3,525.06	11.38
					08/16/22	ND	38.68	0.00	38.68	3,524.72	11.04
					12/20/22	ND	38.89	0.00	38.89	3,524.51	10.83
					02/22/23	ND	38.89	0.00	38.89	3,524.51	10.83
					06/20/23	ND	38.92	0.00	38.92	3,524.48	10.80
					09/14/23	ND	39.49	0.00	39.49	3,523.91	10.23
					10/17/23	ND	38.11	0.00	38.11	3,525.29	11.61
					12/13/23	ND	39.21	0.00	39.21	3,524.19	10.51
					03/07/24	ND	39.19	0.00	39.19	3,524.21	10.53
					05/08/24	ND	39.22	0.00	39.22	3,524.18	10.50
					08/26/24	ND	39.39	0.00	39.39	3,524.01	10.33
					11/21/24	ND	39.51	0.00	39.51	3,523.89	10.21
					03/10/25	ND	39.51	0.00	39.51	3,523.89	10.21
<b>BV-1-D</b>	39.90		3,561.95	32.65 - 39.65	03/07/24	ND	37.81	0.00	37.81	3524.14	2.09
					05/08/24	ND	37.95	0.00	37.95	3524.00	1.95
					08/26/24	ND	38.36	0.00	38.36	3523.59	1.54
					11/21/24	38.22	38.47	0.25	38.24	3523.71	1.66
					03/10/25	38.17	38.62	0.45	38.21	3523.74	1.69
<b>BV-2-D</b>	40.10		3,561.73	34.85 - 39.85	03/07/24	ND	37.52	0.00	37.52	3524.21	2.58
					05/08/24	ND	37.71	0.00	37.71	3524.02	2.39
					08/26/24	ND	38.16	0.00	38.16	3523.57	1.94
					11/21/24	ND	38.23	0.00	38.23	3523.50	1.87
					03/10/25	ND	37.98	0.00	37.98	3523.75	2.12
<b>BV-3-D</b>	42.30		3,562.12	35.05 - 42.05	03/07/24	38.20	39.20	1.00	38.30	3523.83	4.01
					05/08/24	38.25	39.05	0.80	38.33	3523.79	3.97
					08/27/24	38.43	39.12	0.69	38.50	3523.62	3.80
					11/21/24	38.55	39.16	0.61	38.61	3523.51	3.69
					03/10/25	ND	39.75	0.00	39.75	3522.37	2.55
<b>BV-4-D</b>	39.50		3,561.44	29.25 - 39.25	03/07/24	ND	37.30	0.00	37.30	3524.14	2.20
					05/08/24	ND	37.45	0.00	37.45	3523.99	2.05
					08/26/24	ND	37.88	0.00	37.88	3523.56	1.62
					11/21/24	ND	37.97	0.00	37.97	3523.47	1.53
					03/10/25	ND	37.73	0.00	37.73	3523.71	1.77

**Notes:**

amsl = above mean sea level.

btoc = below top of casing.

LNAPL = light non-aqueous phase liquid.

ND = not detected.

BV top of casing elevations calculated from laser level survey conducted on 8/27/2024

Corrected water level elevations calculated using LNAPL specific gravity of 0.905 for MW-01, BV-1-D, and BV-3-D

**TABLE 3**  
**SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS**  
**WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM**

Monitoring Well ID	Sample Date	Constituent of Concern (COC)								TDS (mg/L)	Chloride (mg/L)		
		BTEX (mg/L)				TPH (mg/L)							
		Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	MRO					
Groundwater Action Levels		0.005	0.7	1.0	0.62	None	None	None	None	250			
<b>MW-01</b>	11/7/2020	<0.0050	<0.0050	<0.0050	<0.0050	<b>0.0980</b>	<b>0.084</b>	<0.10 n	<b>3000</b>	<b>1260</b>			
	5/28/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.24</b>	<0.10 n	--	<b>1270</b>			
(Dup)	5/28/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.17</b>	<0.10 n	--	<b>1250</b>			
	10/12/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.052</b>	<0.10 n	--	<b>1280</b>			
	8/16/2022	--	--	--	--	<0.0500	<b>0.083</b>	<b>0.11 n</b>	--	--			
(Dup)	8/16/2022	--	--	--	--	<0.0500	<b>0.085</b>	<b>0.11 n</b>	--	--			
	12/20/2022	--	--	--	--	<0.0500	<b>0.095</b>	<b>0.22 n</b>	--	--			
	2/23/2023	--	--	--	--	<0.0500	<b>0.11</b>	<b>0.22 n</b>	--	--			
(Dup)	2/23/2023	--	--	--	--	<0.0500	<0.051	<0.10 n	--	--			
	6/20/2023	--	--	--	--	<0.0500	<b>0.16</b>	<b>0.23 n</b>	--	--			
	9/14/2023	--	--	--	--	<b>0.576</b>	<b>43</b>	<b>40 n</b>	--	--			
	12/13/2023	--	--	--	--	--	--	--	--	--			
	3/8/2024	--	--	--	--	--	--	--	--	--			
	5/9/2024	--	--	--	--	--	--	--	--	--			
	8/26/2024	--	--	--	--	--	--	--	--	--			
	11/21/2024	--	--	--	--	--	--	--	--	--			
<b>MW-02</b>	11/7/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0500	<0.050	<0.10 n	<b>2970</b>	<b>1210</b>			
	5/25/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.12</b>	<0.10 n	--	<b>1250</b>			
	10/6/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<0.050	<0.10 n	--	<b>1220</b>			
	8/16/2022	--	--	--	--	<0.0500	<b>0.067</b>	<0.099 n	--	--			
	12/20/2022	--	--	--	--	<0.0500	<b>0.090</b>	<b>0.23 n</b>	--	--			
(Dup)	12/20/2022	--	--	--	--	<0.0500	<0.052	<b>0.14 n</b>	--	--			
	2/22/2023	--	--	--	--	<0.0500	<b>0.064</b>	<0.10 n	--	--			
	6/20/2023	--	--	--	--	<0.0500	<b>0.065</b>	<0.10 n	--	--			
	9/14/2023	--	--	--	--	<b>0.425</b>	<b>0.099</b>	<0.10 n	--	--			
(Dup)	9/14/2023	--	--	--	--	<b>0.206</b>	<b>0.090</b>	<0.10 n	--	--			
	12/13/2023	--	--	--	--	<0.0500	<b>0.42</b>	<b>0.93 n</b>	--	--			
	3/8/2024	--	--	--	--	<0.0500	<b>0.078</b>	<b>0.12 n</b>	--	--			
(Dup)	3/8/2024	--	--	--	--	<0.0500	<b>0.12</b>	<b>0.15 n</b>	--	--			
	5/9/2024	--	--	--	--	<0.0100	<b>0.065</b>	<b>0.19 n</b>	--	--			
(Dup)	5/9/2024	--	--	--	--	<0.0100	<b>0.082</b>	<b>0.22 n</b>	--	--			
	8/26/2024	--	--	--	--	<0.0100	<b>0.097</b>	<0.020 n	--	--			
(Dup)	8/26/2024	--	--	--	--	<0.0100	<b>0.10</b>	<b>0.12 n</b>	--	--			
	11/21/2024	--	--	--	--	<0.0200	<b>0.0530</b>	<0.0200 n	--	--			
(Dup)	11/21/2024	--	--	--	--	<0.0200	<b>0.0619</b>	<b>0.113 n</b>	--	--			
	3/12/2025	<0.00020	<0.00030	<0.00020	<0.00030	<0.0200	<0.0040	<0.0200 n	--	--			
(Dup)	3/12/2025	<0.00020	<0.00030	<0.00020	<0.00030	<0.0200	<0.0040	<0.0200 n	--	--			
<b>MW-03</b>	11/7/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0500	<0.050	<0.10 n	<b>1970</b>	<b>736</b>			
	5/25/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.11</b>	<0.10 n	--	<b>849</b>			
	10/12/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<0.050	<0.10 n	--	<b>862</b>			
	8/16/2022	--	--	--	--	<0.0500	<0.051	<0.10 n	--	--			
	12/20/2022	--	--	--	--	<0.0500	<0.050	<0.10 n	--	--			
	2/22/2023	--	--	--	--	<0.0500	<b>0.079</b>	<b>0.31 n</b>	--	--			
	6/20/2023	--	--	--	--	<0.0500	<0.052	<b>0.13 n</b>	--	--			
	9/14/2023	--	--	--	--	<b>0.244</b>	<0.051	<0.10 n	--	--			
	12/13/2023	--	--	--	--	<0.0500	<0.052	<0.10	--	--			
	3/8/2024	--	--	--	--	<0.0500	<b>0.21</b>	<b>0.53 n</b>	--	--			
	5/9/2024	--	--	--	--	<0.0100	<0.021	<b>0.25 n</b>	--	--			
	8/26/2024	--	--	--	--	<0.0100	<b>0.056</b>	<b>0.11 n</b>	--	--			
	11/21/2024	--	--	--	--	<0.0200	<b>0.0503</b>	<b>0.154 n</b>	--	--			
	3/11/2025	<0.00020	<0.00030	<0.00020	<0.00030	<0.0200	<0.0040	<0.0200 n	--	--			

**TABLE 3**  
**SUMMARY OF GROUNDWATER SAMPLE ANALYTICAL RESULTS**  
**WTX TO EMSU BATTERY TO BYRD PUMP CRUDE OIL RELEASE, LEA COUNTY, NM**

Monitoring Well ID	Sample Date	Constituent of Concern (COC)								TDS (mg/L)	Chloride (mg/L)		
		BTEX (mg/L)				TPH (mg/L)							
		Benzene	Ethyl-benzene	Toluene	Total Xylenes	GRO	DRO	MRO					
Groundwater Action Levels		0.005	0.7	1.0	0.62	None	None	None	None	250			
<b>MW-04</b>	11/7/2020	<0.0050	<0.0050	<0.0050	<0.0050	<0.0500	<0.050	<0.10 n	<b>3020</b>	<b>1190</b>			
	5/25/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.064</b>	<0.10 n	--	<b>1310</b>			
	10/6/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<0.050	<0.10 n	--	<b>1230</b>			
(Dup)	10/6/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<0.050	<0.10 n	--	<b>1280</b>			
	8/16/2022	--	--	--	--	<0.0500	<b>0.064</b>	<0.11 n	--	--			
	12/20/2022	--	--	--	--	<0.0500	<b>0.054</b>	<0.10 n	--	--			
	2/22/2023	--	--	--	--	<0.0500	<0.049	<0.099 n	--	--			
	6/20/2023	--	--	--	--	<0.0500	<b>0.080</b>	<0.10 n	--	--			
	9/14/2023	--	--	--	--	<b>0.421</b>	<b>0.12</b>	<b>0.19 n</b>	--	--			
	12/13/2023	--	--	--	--	<0.0500	<b>0.17</b>	<b>0.54 n</b>	--	--			
(Dup)	12/13/2023	--	--	--	--	<0.0500	<b>0.12</b>	<b>0.49 n</b>	--	--			
	3/8/2024	--	--	--	--	<0.0500	<b>0.091</b>	<b>0.12 n</b>	--	--			
	5/9/2024	--	--	--	--	<0.0100	<b>0.075</b>	<b>0.15 n</b>	--	--			
	8/26/2024	--	--	--	--	<0.0100	<b>0.13</b>	<b>0.13 n</b>	--	--			
	11/21/2024	--	--	--	--	<0.0200	<b>0.0548</b>	<b>0.140 n</b>	--	--			
	3/11/2025	<0.00020	<0.00030	<0.00020	<0.00030	<0.0200	<0.0040	<0.0200 n	--	--			
<b>MW-05</b>	5/28/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<b>0.22</b>	<0.10 n	<b>3690</b>	<b>1170</b>			
	10/12/2021	<0.005	<0.005	<0.005	<0.005	<0.0500	<0.050	<0.10 n	--	<b>1230</b>			
	8/16/2022	--	--	--	--	<0.0500	<b>0.065</b>	<0.10 n	--	--			
	12/20/2022	--	--	--	--	<0.0500	<b>0.053</b>	<0.10 n	--	--			
	2/22/2023	--	--	--	--	<0.0500	<0.052	<0.10 n	--	--			
	6/20/2023	--	--	--	--	<0.0500	<b>0.066</b>	<0.10 n	--	--			
(Dup)	6/20/2023	--	--	--	--	<0.0500	<b>0.065</b>	<0.10 n	--	--			
	9/14/2023	--	--	--	--	<b>0.399</b>	<b>0.11</b>	<0.10 n	--	--			
	12/13/2023	--	--	--	--	<0.0500	<0.053	<0.11 n	--	--			
	3/8/2024	--	--	--	--	<0.0500	<b>0.14</b>	<b>0.19 n</b>	--	--			
	5/9/2024	--	--	--	--	<0.0100	<b>0.10</b>	<b>0.24 n</b>	--	--			
	8/26/2024	--	--	--	--	<0.0100	<b>0.13</b>	<b>0.10 n</b>	--	--			
	11/21/2024	--	--	--	--	<0.0200	<b>0.0686</b>	<b>&lt;0.0200 n</b>	--	--			
	3/11/2025	<0.00020	<0.00030	<0.00020	<0.00030	<0.0200	<0.0040	<0.0200 n	--	--			

**Notes:**

COC = constituent of concern.

Groundwater Action Levels = Human health and drinking water standards for groundwater obtained from various sources.

BTEX-Human Health Standards for Groundwater obtained from NMAC 20.6.2.3103 (A).

NMOCD does not have a groundwater action level for TPH.

Chloride-Other Standards for Domestic Water Supply obtained from NMAC 20.6.2.3103 (B).

BTEX = Benzene, Toluene, Ethylbenzene, and Total Xylenes by EPA Method 8260.

TPH = Total Petroleum Hydrocarbons by EPA Method 8015.

GRO = Gasoline Range Organics.

DRO = Diesel Range Organics.

MRO = Motor Oil Range Organics.

Chloride by EPA Method 300.0.

mg/L = milligrams of COC per Liter of groundwater.

-- = Parameter not analyzed.

n = Not offered for accreditation.

Dup = Duplicate sample data.

Detected concentrations reported in **bold**.

Gold shading represents concentration above Other Standards for Domestic Water Supply (NMAC 20.6.2.3103 [A]).



## APPENDIX A

### Form C-141

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

### OPERATOR

Initial Report

Final Repo

Name of Company - Holly Energy Partners (HEP)	Contact - Melanie Nolan
Address 1602 W. Main, Artesia NM 88210	Telephone No. - 214-6058303
Facility Name – WTX to EMSU Battery to Byrd Pump Segment	Facility Type - Pipeline

Surface Owner - Private - Klein	Mineral Owner <b>Federal</b>	API No.
---------------------------------	------------------------------	---------

### LOCATION OF RELEASE

Unit Letter <b>P</b>	Section 11	Township 20	Range 36	Feet from the	North/South Line	Feet from the	East/West Line	County Lea

Latitude 32.583989 Longitude -103.317743 NAD83

### NATURE OF RELEASE

Type of Release – Crude Oil	Volume of Release – Greater than 5 barrels	Volume Recovered – $\frac{1}{2}$ barrel
Source of Release – Pinhole leak in bottom of pipe	Date and Hour of Occurrence - 7/11/18 1310	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* Air Patrol flying our West Texas Crude district spotted a leak west of Monument Jct. HEP personnel confirmed leak and shut down pipe segment. At initial encounter the release was determined to be less than a barrel of crude. Pipe repair was completed and initial excavation of contaminated soil started. Initially release was not reported due to initial estimates being under reportable limits. On 8/6/18 excavation was halted due to discovery that initial area affected is larger than previously thought. Current estimates of what has been excavated are around the 5 barrel amount but no confirmation of exact amount at this time. Surface owner has been notified of release and our Right-of-Way department is in communication with them.	<b>RECEIVED</b> <b>By Olivia Yu at 11:33 am, Aug 10, 2018</b>	
Describe Area Affected and Cleanup Action Taken.* HEP is in process of hiring an outside consulting firm to perform delineation of release site in order to develop a comprehensive remediation to address the clean-up.		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Melanie A. Nolan	Approved by Environmental Specialist: 	
Title: Environmental Specialist I	Approval Date: <u>8/10/2018</u>	Expiration Date:
E-mail Address: Melanie.Nolan@hollyenergy.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 8/10/2018	Phone: 575-748-8972	<b>see attached directive</b>

\* Attach Additional Sheets If Necessary

**fOY1822242653**

**1RP-5154**

**nOY1822242858**

**pOY1822242910**

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 8/10/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 1RP-5154 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 1 office in Hobbs on or before 9/10/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**

OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
**District II**  
811 S. First St., Artesia, NM 88210  
**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural  
Resources Department

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: Holly Energy Partners (HEP)	OGRID: 282505
Contact Name: Melanie Nolan	Contact Telephone: 214-605-8303
Contact email: Melanie.Nolan@hollyenergy.com	Incident # (assigned by OCD) NOY1822242858
Contact mailing address: 1602 W. Main, Artesia NM 88210	

### Location of Release Source

Latitude 32.583989° N Longitude -103.317743° W  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: WTX to EMSU Battery to Byrd Pump Segment	Site Type: Gathering line
Date Release Discovered: 7/11/18 1310	API# (if applicable)

Unit Letter	Section	Township	Range	County
P	11	20S	36E	Lea

Surface Owner:  State  Federal  Tribal  Private (Name: L&K Ranch LLC)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls): Estimated at 5 bbl	Volume Recovered (bbls): 0.5 bbl
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

#### Cause of Release

Air patrol flying HEP's West Texas Crude district spotted a leak west of Monument Junction. HEP personnel confirmed leak from a pinhole caused by corrosion discovered in a gathering line and shut down that line segment for immediate repair. At initial encounter the release was determined to be less than 1 barrel of crude. Line repair was completed and the initial excavation of affected soil started. The release was not initially reported due to estimates being under reportable limits. On August 6, 2018, the excavation was halted due to discovery that the initial area affected was larger than previously thought. Based on excavation efforts to date, the release was approximately 5 barrels. The surface owner has been notified of release. Project was delayed due to protracted access agreement negotiation.

Form C-141

State of New Mexico  
Oil Conservation Division

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Incident ID	
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Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

## Initial Response

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury*

- The source of the release has been stopped.
- The impacted area has been secured to protect human health and the environment.
- Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

The source of the release was stopped and the line was repaired. Approximately 0.5 bbls of free liquids were removed by HEP contractor as part of initial response. Initial observations of affected soil in the top 17 feet of soil (0-17 feet below ground surface [bgs]) were not confirmed through soil sampling as part of initial investigation. Near surface (0-4 feet bgs) soil affected by the release may still be on-site (will confirm with proposed site investigation). The impacted area has not been fenced off but is located inside a fenced ranch. No open excavations remain on-site.

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Melanie Nolan

Title: Environmental Specialist, Holly Energy Partners

Signature: Melanie Nolan

Date: 9/10/2020

email: Melanie.Nolan@hollyenergy.com

Telephone: 575-748-8972

## OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Form C-141

State of New Mexico  
Oil Conservation Division

Page 3

Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	Unknown - <u>Anticipated to be between 45-65 ft bgs (ft bgs)</u>
Did this release impact groundwater or surface water? <b><u>NOTE: WILL BE EVALUATED DURING NEXT PHASE OF SITE ASSESSMENT.</u></b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

**Characterization Report Checklist: Each of the following items must be included in the report.**

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release **NOTE: WILL BE PROVIDED AS PART OF NEXT REPORT SUBMITTED FOR SITE.**
- Boring or excavation logs
- Photographs including date and GIS information **NOTE: WILL BE PROVIDED AS PART OF NEXT REPORT SUBMITTED FOR SITE.**
- Topographic/Aerial maps
- Laboratory data including chain of custody

Form C-141

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State of New Mexico  
Oil Conservation Division

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Application ID	

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Melanie Nolan Title: Environmental Specialist, Holly Energy Partners

Signature: Melanie Nolan Date: 9/10/2020

email: Melanie.Nolan@hollyenergy.com Telephone: 575-748-8972

 **OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Form C-141

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State of New Mexico  
Oil Conservation Division

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District RP	
Facility ID	
Application ID	

## Remediation Plan

### Remediation Plan Checklist: Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique **NOTE: To Be Determined (TBD)**
- Scaled sitemap with GPS coordinates showing delineation points **Note: Scaled Site Map Previously Provided but GPS Coordinates Not Depicted on Map, Data Table or Boring Logs.**
- Estimated volume of material to be remediated **NOTE: TBD**
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required) **NOTE: TBD**

### Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Melanie Nolan Title: Environmental Specialist, Holly Energy Partners

Signature: Melanie Nolan Date: 9/10/2020

email: Melanie.Nolan@hollyenergy.com Telephone: 575-748-8972

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Form C-141

Page 6

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does it relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



## APPENDIX B

### Copies of Email Correspondence

**From:** [Eads, Cristina, EMNRD](#)  
**To:** [Varnell, Richard](#)  
**Cc:** [Sahba, Arsin M.](#); [melanie.nolan](#); [mark.shemaria](#); [Coupland, Lori](#); [Hoover, Shannon](#)  
**Subject:** [EXTERNAL] RE: Extension Request for NOY1822242858 (Holly Energy Partners - WTX to EMSU Battery to Byrd Pump Gathering Line Release)  
**Date:** Thursday, June 10, 2021 10:54:46 AM  
**Attachments:** [image001.png](#)

---

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Richard,

Your extension request is approved. Sorry for the delayed response, and thank you for following up on this.

Thanks,

**Cristina Eads** • Environmental Specialist - A  
 Environmental Bureau  
 EMNRD - Oil Conservation Division  
 5200 Oakland Ave, Suite100 | Albuquerque, NM 87113  
 505.670.5601 | [Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Varnell, Richard <RVarnell@trccompanies.com>  
**Sent:** Wednesday, June 9, 2021 12:03 PM  
**To:** Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>  
**Cc:** Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; melanie.nolan <melanie.nolan@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Coupland, Lori <Lori.Coupland@hollyenergy.com>; Hoover, Shannon <SHoover@trccompanies.com>  
**Subject:** [EXT] RE: Extension Request for NOY1822242858 (Holly Energy Partners - WTX to EMSU Battery to Byrd Pump Gathering Line Release)

Hi Cristina,

Just wanted to follow up on this request again. Would it be possible for you to approve this extension request?

Thanks!

**Richard (RD) Varnell, P.G., P.E.**  
 Senior Project Manager



505 E. Huntland Drive, Suite 250, Austin, TX 78752  
 T 512.626.3990 | F 512.684.3136 | C 512.297.3019  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

**Please note that my office number has changed.**

---

**From:** Varnell, Richard  
**Sent:** Wednesday, May 19, 2021 10:52 AM  
**To:** Eads, Cristina, EMNRD <[Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)>  
**Cc:** Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; melanie.nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Shemaria, Mark <[Mark.Shemaria@hollyenergy.com](mailto:Mark.Shemaria@hollyenergy.com)>; Coupland, Lori <[Lori.Coupland@hollyenergy.com](mailto:Lori.Coupland@hollyenergy.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>  
**Subject:** Extension Request for NOY1822242858 (Holly Energy Partners - WTX to EMSU Battery to Byrd Pump Gathering Line Release)

Hi Cristina,

On behalf of Holly Energy Partners – Operating, L.P. (HEP), we are requesting a 60 day extension to complete the additional site investigation approved by NMOCD at the WTX to EMSU Battery to Byrd Pump Gathering Line Release site (NOY1822242858). We are requesting this extension due to delays in performing field work because of difficulty scheduling a hollow stem auger drilling rig, which we felt was necessary to complete the proposed work plan. Approving an extension for this site will provide us with sufficient time to evaluate the analytical data that will be obtained from the site next week, formulate next steps, and submit a report to NMOCD.

If the 60-day extension is granted, per our records, the new due date for the revised Site Characterization Report would be 8/14/2021.

Thanks!

**Richard (RD) Varnell, P.G., P.E.**  
Senior Project Manager



505 E. Huntland Drive, Suite 250, Austin, TX 78752  
T 512.626.3990 | F 512.684.3136 | C 512.297.3019  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

**Please note that my office number has changed.**

**From:** [Eads, Cristina, EMNRD](#)  
**To:** [Varnell, Richard](#)  
**Cc:** [Sahba, Arsin M.](#); [mark.shemaria](#); [melanie.nolan](#); [Coupland, Lori](#); [Gilbert, Bryan](#); [Hoover, Shannon](#)  
**Subject:** [EXTERNAL] RE: WTX to EMSU Battery to Byrd Pump Crude Oil Release Site (NOY1822242858)  
**Date:** Friday, July 16, 2021 3:37:49 PM  
**Attachments:** [image001.png](#)

---

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Richard,

HEP's extension request is approved to perform the work as described below. Please contact the division if anything changes with this scope of work.

Thanks,

**Cristina Eads** • Environmental Specialist - A  
Environmental Bureau  
EMNRD - Oil Conservation Division  
5200 Oakland Ave, Suite100 | Albuquerque, NM 87113  
505.670.5601 | [Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Varnell, Richard <RVarnell@trcccompanies.com>  
**Sent:** Friday, July 16, 2021 2:04 PM  
**To:** Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>  
**Cc:** Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; melanie.nolan <melanie.nolan@hollyenergy.com>; Coupland, Lori <Lori.Coupland@hollyenergy.com>; Gilbert, Bryan <BGilbert@trcccompanies.com>; Hoover, Shannon <SHoover@trcccompanies.com>  
**Subject:** WTX to EMSU Battery to Byrd Pump Crude Oil Release Site (NOY1822242858)

Hi Cristina,

Per our recent discussion we've prepared this email to request an extension, propose additional investigation scope, and summarize the May 2021 Site investigation at the WTX to EMSU Battery to Byrd Pump Crude Oil Release Site (NOY1822242858). The investigation was generally performed as described in the December 2020 Site Characterization Report (SCR) – eleven borings were installed (eight were proposed in the SCR), and one boring was converted to upgradient monitoring well MW-5. Groundwater samples were obtained from all five monitoring wells.

Based on the soil sample analytical results (Table 1 and Figure 1), the Total Petroleum Hydrocarbon (TPH) affected soil to the east of the release at soil borings SB-19 and SB-21 has not been laterally delineated. To complete the lateral soil delineation, Holly Energy Partners – Operating, L.P. (HEP) proposes installing two more borings: one boring east of SB-21 and one boring north-northeast of SB-19 and SB-21 (i.e., east and northeast of the release point). These borings will be installed to a maximum depth of 35 feet bgs and

sampled for TPH using EPA Method 8015. The proposed boring locations are shown on Figure 1. The analytical results of the groundwater samples are provided in Table 2 and Figure 2. To further assess groundwater conditions at the Site, HEP proposes collecting one additional round of groundwater samples from wells MW-1 through MW-5 for analysis of TPH; chloride; and benzene, toluene, ethylbenzene, and total xylenes (BTEX) using appropriate analytical methods. The November 2020 groundwater potentiometric surface map is provided as Figure 3. The lab reports from the May 2021 investigation are also attached.

HEP requests a 90-day extension from the current due date of August 14, 2021, to perform the additional investigation proposed for the Site (completion of two borings for lateral soil delineation and additional groundwater sample collection); evaluate the data; and prepare an updated SCR for submittal to NMOCD. A 90-day extension would result in a new due date of November 12, 2021. Please contact us with questions or comments, and please let us know if/when this extension is approved.

Thanks!

-RD

**Richard (RD) Varnell, P.G., P.E.**  
Senior Project Manager



505 E. Huntland Drive, Suite 250, Austin, TX 78752  
**T** 512.626.3990 | **F** 512.684.3136 | **C** 512.297.3019  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

**Please note that my office number has changed.**

**Stoffel, Jared**

**From:** Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>  
**Sent:** Tuesday, April 5, 2022 4:42 PM  
**To:** Stoffel, Jared; Bratcher, Mike, EMNRD  
**Cc:** Gilbert, Bryan; Sahba, Arsin M.; Melanie Nolan; Trevor.baird; mark.shemaria; Clark, Darija; Helbert, Dana; Hoover, Shannon; Varnell, Richard  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Friday, April 1, 2022 2:59 PM  
**To:** Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Gilbert, Bryan <BGilbert@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Helbert, Dana <DHelbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>

**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

**Stoffel, Jared**

**From:** Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>  
**Sent:** Thursday, April 7, 2022 8:16 AM  
**To:** Stoffel, Jared; Bratcher, Mike, EMNRD  
**Cc:** Gilbert, Bryan; Sahba, Arsin M.; Melanie Nolan; Trevor.baird; mark.shemaria; Clark, Darija; Helbert, Dana; Hoover, Shannon; Varnell, Richard  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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**Flag Status:** Flagged

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Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
 Environmental Bureau  
 EMNRD - Oil Conservation Division  
 811 First St. | Artesia, NM 88210  
 Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Wednesday, April 6, 2022 3:42 PM  
**To:** Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Gilbert, Bryan <BGilbert@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Helbert, Dana <DHelbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>  
**Sent:** Tuesday, April 5, 2022 4:42 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, April 1, 2022 2:59 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan

<[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria

<[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana

<[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard

<[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

Jared Stoffel, P.G.  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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## Stoffel, Jared

---

**From:** Stoffel, Jared  
**Sent:** Monday, August 1, 2022 11:29 AM  
**To:** Nobui, Jennifer, EMNRD; Billings, Bradford, EMNRD; mike.bratcher@state.nm.us  
**Cc:** Gilbert, Bryan; Sahba, Arsin M.; Melanie Nolan; Trevor.baird; Clark, Darija; Helbert, Dana; Hoover, Shannon; Varnell, Richard  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Hensley, Chad, EMNRD <Chad.Hensley@state.nm.us>  
**Sent:** Thursday, April 7, 2022 8:16 AM  
**To:** Stoffel, Jared <JStoffel@trccompanies.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Gilbert, Bryan <BGilbert@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; mark.shemaria <mark.shemaria@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Helbert, Dana <DHelbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
 Environmental Bureau  
 EMNRD - Oil Conservation Division  
 811 First St. | Artesia, NM 88210  
 Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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 Project Manager



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<[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

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EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
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(NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

**Stoffel, Jared**

---

**From:** Stoffel, Jared  
**Sent:** Friday, August 12, 2022 1:49 PM  
**To:** Billings, Bradford, EMNRD; Nobui, Jennifer, EMNRD; mike.bratcher@state.nm.us  
**Cc:** Sahba, Arsin; Trevor.baird; Melanie Nolan; Clark, Darija; Gilbert, Bryan; Hoover, Shannon; Helbert, Dana; Varnell, Richard  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

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- Remedial Excavation and Sampling – Due to the revised bioventing pilot test and quarterly groundwater monitoring schedules, remedial excavation and sampling activities are scheduled for August 17 to 19.

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

**Jared Stoffel, P.G.**  
Project Manager



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**From:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Sent:** Thursday, August 4, 2022 11:48 AM  
**To:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, August 1, 2022 10:29 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>  
**Sent:** Thursday, April 7, 2022 8:16 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
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Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

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**Stoffel, Jennifer R.**

**From:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Sent:** Monday, August 15, 2022 12:20 PM  
**To:** Stoffel, Jared  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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**Jared Stoffel, P.G.**  
Project Manager



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**Sent:** Thursday, August 4, 2022 11:48 AM

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EMNRD/OCD

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**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

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**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

Jared Stoffel, P.G.  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Thursday, April 7, 2022 8:16 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
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Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

**Jared Stoffel, P.G.**  
Project Manager



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**Sent:** Tuesday, April 5, 2022 4:42 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley • Environmental Science & Specialist**

Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/ODC/>



**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, April 1, 2022 2:59 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

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**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**Stoffel, Jared**

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>  
**Sent:** Wednesday, August 17, 2022 1:59 PM  
**To:** Stoffel, Jared; Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Sahba, Arsin; Trevor.baird; Melanie Nolan; Clark, Darija; Gilbert, Bryan; Hoover, Shannon; Helbert, Dana; Varnell, Richard; Hamlet, Robert, EMNRD; Harimon, Jocelyn, EMNRD  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Thank you Jared for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Please let us know if you encounter any delays or have any questions.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Friday, August 12, 2022 12:49 PM  
**To:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Helbert, Dana <DHelbert@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to follow up on our notification of the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities with an updated timeline. Field activities were projected to be completed by August 12. An updated timeline is provided below.

- Bioventing Pilot Test - Field activities began on August 3, 2022, but the pilot test did not commence until August 9 (Day 1) due to equipment issues and troubleshooting. The pilot test is anticipated to be complete on August 15 (Day 7).
- Soil Boring – Drilling was originally scheduled for August 8. Due to a change in drill rig availability (the drill rig scheduled for the work was not operational), drilling is now scheduled for August 15.

- Quarterly Groundwater Monitoring – Due to the revised bioventing pilot test schedule (the monitoring wells cannot be gauged and sampled during the pilot test), quarterly groundwater monitoring activities are scheduled to begin August 16. This is a slight deviation from the schedule presented in the April 2022 Remediation Work Plan Addendum, which indicated quarterly groundwater monitoring would commence within 90 days of NMOCD approval of the Work Plan (i.e., August 13). Groundwater monitoring activities are expected to take 1 – 2 days.
- Remedial Excavation and Sampling – Due to the revised bioventing pilot test and quarterly groundwater monitoring schedules, remedial excavation and sampling activities are scheduled for August 17 to 19.

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

Jared Stoffel, P.G.  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Sent:** Thursday, August 4, 2022 11:48 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, August 1, 2022 10:29 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
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**Jared Stoffel, P.G.**  
Project Manager



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**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Thursday, April 7, 2022 8:16 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

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Jared,

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Cheers,

**Chad Hensley** • Environmental Science & Specialist  
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**Sent:** Wednesday, April 6, 2022 3:42 PM

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**Jared Stoffel, P.G.**  
Project Manager



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Jared,

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Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

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<[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana

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<[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

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Mr. Hensley and Mr. Bratcher,

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Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**Stoffel, Jared**

---

**From:** Gilbert, Bryan  
**Sent:** Tuesday, August 23, 2022 5:31 PM  
**To:** Nobui, Jennifer, EMNRD; Stoffel, Jared; Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Sahba, Arsin; Trevor.baird; Melanie Nolan; Clark, Darija; Hoover, Shannon; Helbert, Dana; Varnell, Richard; Hamlet, Robert, EMNRD; Harimon, Jocelyn, EMNRD  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Good Afternoon Jennifer,

Based on the initial confirmation soil sample analytical results for the excavation performed on August 17 and 18, additional remedial excavation and sampling will be conducted at the site on Thursday, August 25.

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

Thanks!

Bryan Gilbert, P.G.  
Austin Office ECW Practice Leader



505 E. Huntland Drive, Suite 250, Austin, TX 78752  
C: 925.699.6184 | F: 512.329.8750  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>  
**Sent:** Wednesday, August 17, 2022 1:59 PM  
**To:** Stoffel, Jared <JStoffel@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Cc:** Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Trevor.baird <Trevor.baird@hollyenergy.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Clark, Darija <dclark@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Hoover, Shannon <SHoover@trccompanies.com>; Helbert, Dana <DHelbert@trccompanies.com>; Varnell, Richard <RVarnell@trccompanies.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@state.nm.us>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Thank you Jared for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Please let us know if you encounter any delays or have any questions.

Thanks,  
Jennifer Nobui

---

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**Sent:** Friday, August 12, 2022 12:49 PM  
**To:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
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**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to follow up on our notification of the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities with an updated timeline. Field activities were projected to be completed by August 12. An updated timeline is provided below.

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

**Jared Stoffel, P.G.**  
Project Manager



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**Sent:** Thursday, August 4, 2022 11:48 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Monday, August 1, 2022 10:29 AM

**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

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**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Thursday, April 7, 2022 8:16 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana

<[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

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Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

Jared Stoffel, P.G.  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Tuesday, April 5, 2022 4:42 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, April 1, 2022 2:59 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

Jared Stoffel, P.G.  
Project Manager



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**Stoffel, Jared**

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>  
**Sent:** Tuesday, August 23, 2022 5:34 PM  
**To:** Gilbert, Bryan; Stoffel, Jared; Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Sahba, Arsin; Trevor.baird; Melanie Nolan; Clark, Darija; Hoover, Shannon; Helbert, Dana; Varnell, Richard; Hamlet, Robert, EMNRD; Harimon, Jocelyn, EMNRD  
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**Sent:** Tuesday, August 23, 2022 4:31 PM  
**To:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@state.nm.us>; Stoffel, Jared <JStoffel@trccompanies.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
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Good Afternoon Jennifer,

Based on the initial confirmation soil sample analytical results for the excavation performed on August 17 and 18, additional remedial excavation and sampling will be conducted at the site on Thursday, August 25.

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

Thanks!

Bryan Gilbert, P.G.  
Austin Office ECW Practice Leader



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C: 925.699.6184 | F: 512.329.8750

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Jennifer Nobui

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All,

I would like to follow up on our notification of the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities with an updated timeline. Field activities were projected to be completed by August 12. An updated timeline is provided below.

- Bioventing Pilot Test - Field activities began on August 3, 2022, but the pilot test did not commence until August 9 (Day 1) due to equipment issues and troubleshooting. The pilot test is anticipated to be complete on August 15 (Day 7).
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- Remedial Excavation and Sampling – Due to the revised bioventing pilot test and quarterly groundwater monitoring schedules, remedial excavation and sampling activities are scheduled for August 17 to 19.

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

**Jared Stoffel, P.G.**  
Project Manager



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**Sent:** Thursday, August 4, 2022 11:48 AM  
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Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

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**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, August 1, 2022 10:29 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>  
**Sent:** Thursday, April 7, 2022 8:16 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Tuesday, April 5, 2022 4:42 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210

Office: 575.748.1283 | Cell: 575-703-1723

[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, April 1, 2022 2:59 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[carsin.sahba@hollyfrontier.com](mailto:carsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**Stoffel, Jared**

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>  
**Sent:** Tuesday, December 13, 2022 12:48 PM  
**To:** Stoffel, Jared  
**Cc:** Billings, Bradford, EMNRD; Bratcher, Michael, EMNRD; Melanie Nolan; Gilbert, Bryan; Pearson, Christopher; Leik, Jason; Sahba, Arsin; Velez, Nelson, EMNRD  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hello Jared

Your Remedial Plan for full scale implementation of the bioventing system has been approved. OCD approved it in the OCD portal on 11/28/22 with APP ID # 150523. But you can use this email as well for final approval. I will also make note of final approval of full scale bioventing system implementation in the Incident Events Notes. Please save this email and include it in the upcoming start up report. Let me know if you have any questions.

Thanks

Jennifer Nobui

---

**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Tuesday, December 13, 2022 9:02 AM  
**To:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>  
**Cc:** Billings, Bradford, EMNRD <Bradford.Billings@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Pearson, Christopher <CPearson@trccompanies.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Understood and noted. Please let me know if there are any other questions, comments, or concerns – otherwise we look forward to hearing back regarding the approval of the full-scale system through the portal. Thank you very much!

Jared Stoffel, P.G.  
Project Manager



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**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Monday, December 12, 2022 3:38 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Thank you Jared for the response below. One quick addition for item #7

7. The proposed bioventing wells should be considered 'remediation wells' and thus **do not** require a C-108 or Class V injection permit approval. **No additional action is required on behalf of HEP with respect to the C-108 or Class V injection permits.**

Please note that each well needs to be named (nomenclature) and tracked individually, each wells' data produced and operating time needs to be tracked and documented just in case EPA contacts you regarding these wells. Please make note of that correction.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, December 12, 2022 2:15 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

Thank you very much for meeting with us regarding the WTX to EMSU Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report submitted October 10, 2022. A brief summary of our meeting and path forward is provided below.

1. Soil boring SB-19A results showed no BTEX detected in soil above Closure Criteria. No further action with regards to SB-19A.
2. Remedial excavation was completed in accordance with the April 1, 2022 Work Plan Addendum that was approved by the OCD on April 5, 2022. Affected soil from surface to 4.5' bgs has been removed from the site.

3. Affected soil deeper than 4.5 feet bgs will be addressed during proposed full-scale bioventing.
4. HEP's interpretation of the bioventing pilot test results were supported by OCD as discussed during the call, including:
  - a. pressure propagation shows an effective injection ROI of up to 90 feet; and
  - b. the effective injection ROI indicated by the pressure propagation was corroborated by the soil gas results, including oxygen, VOCs, and carbon dioxide.
5. HEP's proposed full-scale bioventing system design was generally consistent with OCD's expectations as discussed during the call.
6. OCD has requested that HEP conduct weekly operations and maintenance (O&M) of the bioventing system for 1 to 2 months following installation and start-up rather than 2-3 weeks proposed by HEP. HEP will evaluate the weekly O&M data after 1 month of operation and will use this data to determine if a second month of weekly O&M is appropriate.
7. The proposed bioventing wells should be considered 'remediation wells' and thus **do not** require a C-108 or Class V injection permit approval. **No additional action is required on behalf of HEP with respect to the C-108 or Class V injection permits.**
8. OCD has requested that confirmation soil borings be proposed for OCD approval once bioventing system data indicate bioventing objectives have been achieved.

Based on our meeting, we anticipate a conditional approval of the October 12, 2022 Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report, thus an additional revision and submittal by HEP to the OCD will not be required. The primary change to the October 2022 report requested by OCD is the additional weekly system O&M following installation and startup (1-2 months rather than 2-3 weeks). HEP does not expect to receive a response or approval of the C-108/Class V permits provided in the October 12, 2022 Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report in order to enact the proposed full-scale bioventing remedy. Please let me know if I've missed or mischaracterized any of our items of discussion.

Again, thank you for taking the time to review the bioventing results and recommendations with us.

**Jared Stoffel, P.G.**  
Project Manager



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**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Thursday, December 1, 2022 3:44 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hello Jared

We are available for a discussion December 6, 2022 Tuesday at 3pm MST. Please send us an evite.

Thanks  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Thursday, December 1, 2022 2:03 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Jennifer –

Thank you for discussing the WTX to EMSU site with me yesterday. As we discussed, we have already completed the excavation, soil boring installation, and bioventing pilot test activities as approved by Chad Hensley on April 5, 2022. The most recently submitted report (submitted on October 12, 2022) documents the excavation, soil boring, and the results of the bioventing pilot test and provides recommendations for the full-scale bioventing system. I've attached the report for reference – I know there have been multiple submissions for this Site, and want to ensure that we both are referencing the same document.

In order to facilitate our additional discussion of what has occurred to date and answer any questions regarding the bioventing pilot test results, we would like to conduct a meeting with you and your team. Our team's availability (cc'd in this email) for this week and next week include:

December 2: any time of day  
December 5: After 4 MST  
December 6: After 3 MST  
December 7: After 2:30 MST  
December 9: After 2 MST

Would any of these days and times work for you? If so, I will set up a Teams meeting at your preferred time. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



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**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Monday, November 28, 2022 11:12 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hello Jared

I wanted to let you know that the Remediation Plan for the above-referenced site detailing a pilot test for bioventing has been approved with conditions. OCD has approved the proposed excavation activities and the advancement of a soil boring. In addition, OCD has approved the implementation of a pilot test for bioventing. However, please do not proceed with the full scale implementation of the bioventing system until OCD has had the opportunity to review the pilot test data to evaluate effectiveness of a full scale system. Please schedule a meeting with OCD after the pilot test has been completed so we can go over the data.

Also, at this time you are not required to submit a C-108 form or a EPA UDS Sheet. That will need to be addressed once full scale implementation is approved. Please let me know if you have any questions.

Thanks,

**Jennifer Nobui, PG** • Environmental Specialist A  
Environmental Bureau  
EMNRD - Oil Conservation Division  
5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113  
505.470-3407 | [Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Thursday, October 13, 2022 11:24 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@emnrd.nm.gov](mailto:Jocelyn.Harimon@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Jennifer,

I wanted to provide an update that the report documenting the pilot test and soil remediation activities along with the full-scale bioventing system recommendations has been submitted through the portal. Please let me know if you have any questions that arise during your review. Thank you very much!

Jared Stoffel, P.G.  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>  
**Sent:** Tuesday, August 23, 2022 5:34 PM  
**To:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Thanks Gilbert for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thanks,  
Jennifer Nobui

---

**From:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>  
**Sent:** Tuesday, August 23, 2022 4:31 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Good Afternoon Jennifer,

Based on the initial confirmation soil sample analytical results for the excavation performed on August 17 and 18, additional remedial excavation and sampling will be conducted at the site on Thursday, August 25.

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

Thanks!

Bryan Gilbert, P.G.  
Austin Office ECW Practice Leader



505 E. Huntland Drive, Suite 250, Austin, TX 78752

C: 925.699.6184 | F: 512.329.8750

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---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>

**Sent:** Wednesday, August 17, 2022 1:59 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Thank you Jared for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Please let us know if you encounter any delays or have any questions.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, August 12, 2022 12:49 PM

**To:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to follow up on our notification of the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities with an updated timeline. Field activities were projected to be completed by August 12. An updated timeline is provided below.

- Bioventing Pilot Test - Field activities began on August 3, 2022, but the pilot test did not commence until August 9 (Day 1) due to equipment issues and troubleshooting. The pilot test is anticipated to be complete on August 15 (Day 7).
- Soil Boring – Drilling was originally scheduled for August 8. Due to a change in drill rig availability (the drill rig scheduled for the work was not operational), drilling is now scheduled for August 15.
- Quarterly Groundwater Monitoring – Due to the revised bioventing pilot test schedule (the monitoring wells cannot be gauged and sampled during the pilot test), quarterly groundwater monitoring activities are scheduled to begin August 16. This is a slight deviation from the schedule presented in the April 2022 Remediation Work Plan Addendum, which indicated quarterly groundwater monitoring would commence within 90 days of NMOCD approval of the Work Plan (i.e., August 13). Groundwater monitoring activities are expected to take 1 – 2 days.
- Remedial Excavation and Sampling – Due to the revised bioventing pilot test and quarterly groundwater monitoring schedules, remedial excavation and sampling activities are scheduled for August 17 to 19.

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

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Sent:** Thursday, August 4, 2022 11:48 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Monday, August 1, 2022 10:29 AM

**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD

<[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan

<[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Clark, Darija

<[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon

<[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Thursday, April 7, 2022 8:16 AM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan

<[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria

<[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana

<[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard

<[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
 Environmental Bureau  
 EMNRD - Oil Conservation Division  
 811 First St. | Artesia, NM 88210  
 Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/ODC/>



**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

**Jared Stoffel, P.G.**  
 Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>

**Sent:** Tuesday, April 5, 2022 4:42 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria

<[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist

Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Friday, April 1, 2022 2:59 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site

(NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
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**Stoffel, Jared**

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>  
**Sent:** Thursday, December 15, 2022 1:10 PM  
**To:** Stoffel, Jared; Billings, Bradford, EMNRD; Bratcher, Michael, EMNRD  
**Cc:** Melanie Nolan; Sahba, Arsin; Leik, Jason; Gilbert, Bryan; Clark, Darija; Harimon, Jocelyn, EMNRD  
**Subject:** RE: [EXTERNAL] WTX to EMSU Groundwater Sampling Notification (NOY1822241858)

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Hello Jared

Thank you for the notification. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Thursday, December 15, 2022 11:46 AM  
**To:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>; Billings, Bradford, EMNRD <Bradford.Billings@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>  
**Cc:** Melanie Nolan <melanie.nolan@hollyenergy.com>; Sahba, Arsin <Arsin.Sahba@HFSinclair.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>  
**Subject:** [EXTERNAL] WTX to EMSU Groundwater Sampling Notification (NOY1822241858)

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Jennifer –

TRC, on the behalf of HEP, will be conducting the 4<sup>th</sup> quarter groundwater sampling event at the WTX to EMSU site (NOY1822241858) on December 20, 2022. We expect the event duration to be 1 day. Please let me know if you have any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
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**Stoffel, Jared**

**From:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>  
**Sent:** Tuesday, February 21, 2023 9:37 AM  
**To:** Stoffel, Jared; Melanie Nolan; arsin.sahba@hfsinclair.com; jason.leik@hfsinclair.com; Gilbert, Bryan; Clark, Darija  
**Cc:** Nobui, Jennifer, EMNRD; Velez, Nelson, EMNRD  
**Subject:** RE: [EXTERNAL] WTX to EMSU Groundwater Sampling Notification (NOY1822241858)

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Correction to the incident number: **NOY1822242858**

**From:** Nobui, Jennifer, EMNRD <Jennifer.Nobui@emnrd.nm.gov>  
**Sent:** Monday, February 20, 2023 2:43 PM  
**To:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>  
**Subject:** FW: [EXTERNAL] WTX to EMSU Groundwater Sampling Notification (NOY1822241858)

fyi

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, February 20, 2023 1:42 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Cc:** Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>  
**Subject:** [EXTERNAL] WTX to EMSU Groundwater Sampling Notification (NOY1822241858)

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Jennifer –

TRC, on the behalf of HEP, will be conducting the 1<sup>st</sup> quarter groundwater sampling event at the WTX to EMSU site (NOY1822241858) on February 22, 2023. We expect the event duration to be 1 day. Please let me know if you have any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
 Project Manager



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**From:** [Stoffel, Jared](#)  
**To:** [Bratcher, Michael, EMNRD](#); [Hamlet, Robert, EMNRD](#); [Harimon, Jocelyn, EMNRD](#); [Buchanan, Michael, EMNRD](#)  
**Cc:** [Leik, Jason](#); [Sahba, Arsin M.](#); [melanie.nolan](#); [Gilbert, Bryan](#); [Clark, Darija](#)  
**Subject:** FW: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)  
**Date:** Wednesday, November 1, 2023 12:36:00 PM  
**Attachments:** [image001.png](#)  
[image004.png](#)  
[WTX to EMSU Easement Map\\_9.28.23.pdf](#)

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All,

I wanted to follow up on my previous email regarding the delay in the installation of an electrical power drop at the site. We have continued to work to resolve the Xcel easement with the Byrd property to the east. As of now, there is still no timeline for resolution of the Byrd easement. As we approach November 16, 2023, the target date for installation and activation of the remediation system, we wanted to meet with you to discuss our progress and options moving forward. Please let us know if you have time for a meeting over the next 2 weeks.

Thank you very much.

**Jared Stoffel, P.G.**

Project Manager



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**From:** Stoffel, Jared <JStoffel@trccompanies.com>

**Sent:** Wednesday, October 4, 2023 12:17 PM

**To:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Harimon, Jocelyn, EMNRD <Jocelyn.Harimon@emnrd.nm.gov>; Buchanan, Michael, EMNRD <Michael.Buchanan@emnrd.nm.gov>

**Cc:** Gilbert, Bryan <BGilbert@trccompanies.com>; Clark, Darija <dclark@trccompanies.com>; Melanie Nolan <melanie.nolan@hollyenergy.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

As you are aware, HEP has experienced a delay in the installation of an electrical power drop at the site, which is required to facilitate operation of the planned bioventing remediation system. HEP does not have active power lines or facilities in the area, which is very remote. HEP has been working with Xcel Energy, the local provider, on the power drop. The nearest Xcel line for a power drop is over 0.5 mile to the east and will require that a new electrical line cross two properties to provide service to the site. Thus, Xcel must obtain easements with both property owners before construction of the electrical line can begin. The easement with the Kleins has been obtained, but Xcel is experiencing delays in the executing the easement with the Byrd property to the east of the site.

Once the easements are in place, the electrical infrastructure will be installed, but the Byrd easement is currently pending legal resolution. There is currently no timeline for resolution of the Byrd easement. For reference, a map of the intended easements from the nearest Xcel owned line to the WTX to EMSU Site and the referenced approximate property boundary is attached.

Given the electrical power drop delay, HEP is re-evaluating power options for the bioventing system. We intend to have a path forward for an alternative power source prior to the November 16, 2023, deadline if the power easement issues have not been resolved and will notify you of the path forward accordingly. If an alternative power source is selected and the property owner has provided approval, HEP will begin procurement and system installation. If the access agreement between Xcel and the Byrd estate is resolved prior to the deadline, we will notify you and move forward with installation of the power lines.

The third quarter 2023 groundwater monitoring event was conducted on September 14, 2023. Per recent voicemails left with Mr. Bratcher, 0.02 feet of apparent LNAPL was detected in well MW-1, located near the former release point. The LNAPL was confirmed with a bailer and did not recharge to the well within 5 hours of bailing. LNAPL has not previously been observed at the site to date. Groundwater levels at the site are at historical lows. It is likely that the presence of LNAPL in well MW-1 is associated with low groundwater levels and is not indicative of migrating LNAPL or a recent release (the pipeline is not active). Regardless, HEP will install a sorbent sock in well MW-1 during October 2023 to recover the accumulating LNAPL.

Please let us know if you have any questions, comments, or concerns – I am happy to facilitate a meeting to further discuss powering the system and/or the LNAPL. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**From:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Sent:** Monday, August 21, 2023 9:15 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@emnrd.nm.gov](mailto:Jocelyn.Harimon@emnrd.nm.gov)>; Buchanan, Michael, EMNRD <[Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Jared,

Your request for an extension is approved to November 16, 2023. OCD realizes and appreciates this is a relatively complex project, however, the release is now five years old and OCD requests steps be taken to either move the project along or propose an alternative remediation plan. Electrical hook-ups are made daily in the oil patch and rarely interfere with production needs. The same urgency should apply to this remedial project or an alternative such as solar be considered. Please advise once power connection activities have commenced.

Thank you,

**Mike Bratcher** • Incident Supervisor  
Environmental Bureau  
EMNRD - Oil Conservation Division  
506 W. Texas Ave | Artesia, NM 88210  
(575) 626-0857 | [mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)  
<http://www.emnrd.nm.gov/ocd>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Friday, August 18, 2023 1:27 PM  
**To:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@emnrd.nm.gov](mailto:Jocelyn.Harimon@emnrd.nm.gov)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

We respectfully request a 90-day extension from today for installation and activation of the bioventing system (i.e., until November 16, 2023), as we are still working with an electrical service provider to run power to the Site. We have been told that construction of the power drop will begin in late-September and will take approximately 1 week to complete. Assuming this schedule holds, we anticipate activation of the system on or before November 16th. The wells have already been installed, so we anticipate the final system installation and activation promptly following completion of the power drop. Please let me know if you approve this extension request. I am available at your

convenience if you have questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Tuesday, April 18, 2023 3:46 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@emnrd.nm.gov](mailto:Jocelyn.Harimon@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Hello Jared

Your request for a 90-day extension has been approved to July 18, 2023. Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Please let us know if you have any questions.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, March 27, 2023 3:18 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Velez, Nelson, EMNRD

<[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Ms. Nobui,

In the October 12, 2022 Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report, which you approved on November 28, 2022, the schedule states that the full-scale bioventing system will be installed and activated within 120 days of NMOCD approval of the report (i.e., by March 28, 2023). We have had delays due to landowner concurrence and access, NMOSE permitting, subcontractor availability, and electrical service. We are requesting a 90-day extension for installation and activation of the bioventing system (i.e., until June 26, 2023). We have made significant progress with the landowner, NMOSE, and drilling subcontractor, and hope to resolve the remaining issues regarding electrical service in the immediate future to allow for activation of the system by this date.

Please let me know if you approve this extension request. I am available at your convenience if you have questions or concerns. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



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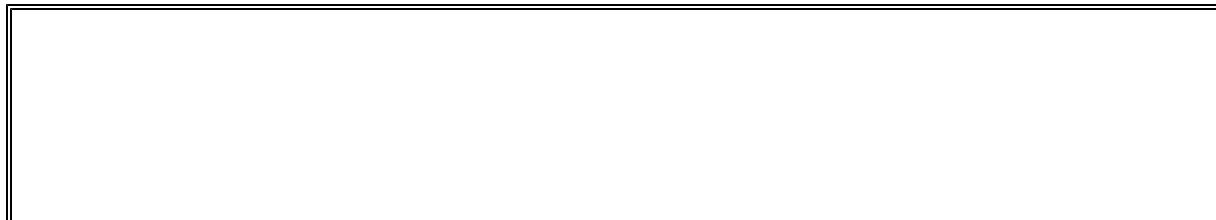
**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>

**Sent:** Tuesday, December 13, 2022 12:48 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Hello Jared

Your Remedial Plan for full scale implementation of the bioventing system has been approved. OCD approved it in the OCD portal on 11/28/22 with APP ID # 150523. But you can use this email as well for final approval. I will also make note of final approval of full scale bioventing system implementation in the Incident Events Notes. Please save this email and include it in the upcoming start up report. Let me know if you have any questions.

Thanks

Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Tuesday, December 13, 2022 9:02 AM

**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>

**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Understood and noted. Please let me know if there are any other questions, comments, or concerns – otherwise we look forward to hearing back regarding the approval of the full-scale system through the portal. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



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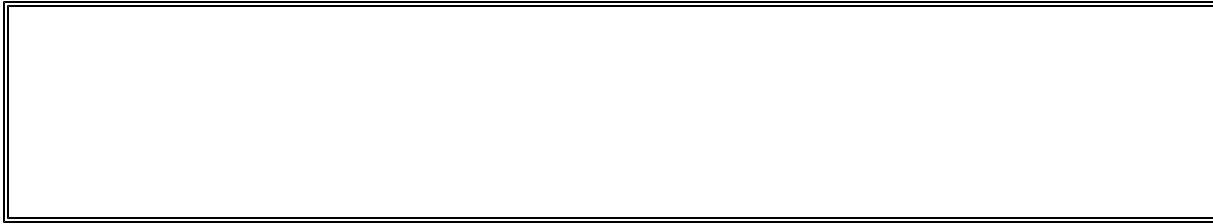
**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>

**Sent:** Monday, December 12, 2022 3:38 PM

**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Thank you Jared for the response below. One quick addition for item #7

7. The proposed bioventing wells should be considered 'remediation wells' and thus **do not** require a C-108 or Class V injection permit approval. **No additional action is required on behalf of HEP with respect to the C-108 or Class V injection permits.**

Please note that each well needs to be named (nomenclature) and tracked individually, each wells' data produced and operating time needs to be tracked and documented just in case EPA contacts you regarding these wells. Please make note of that correction.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, December 12, 2022 2:15 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

Thank you very much for meeting with us regarding the WTX to EMSU Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report submitted October 10, 2022. A brief summary of our meeting and path forward is provided below.

1. Soil boring SB-19A results showed no BTEX detected in soil above Closure Criteria. No further action with regards to SB-19A.
2. Remedial excavation was completed in accordance with the April 1, 2022 Work Plan Addendum that was approved by the OCD on April 5, 2022. Affected soil from surface to 4.5' bgs has been removed from the site.
3. Affected soil deeper than 4.5 feet bgs will be addressed during proposed full-scale bioventing.
4. HEP's interpretation of the bioventing pilot test results were supported by OCD as discussed

during the call, including:

- a. pressure propagation shows an effective injection ROI of up to 90 feet; and
- b. the effective injection ROI indicated by the pressure propagation was corroborated by the soil gas results, including oxygen, VOCs, and carbon dioxide.

5. HEP's proposed full-scale bioventing system design was generally consistent with OCD's expectations as discussed during the call.
6. OCD has requested that HEP conduct weekly operations and maintenance (O&M) of the bioventing system for 1 to 2 months following installation and start-up rather than 2-3 weeks proposed by HEP. HEP will evaluate the weekly O&M data after 1 month of operation and will use this data to determine if a second month of weekly O&M is appropriate.
7. The proposed bioventing wells should be considered 'remediation wells' and thus **do not** require a C-108 or Class V injection permit approval. **No additional action is required on behalf of HEP with respect to the C-108 or Class V injection permits.**
8. OCD has requested that confirmation soil borings be proposed for OCD approval once bioventing system data indicate bioventing objectives have been achieved.

Based on our meeting, we anticipate a conditional approval of the October 12, 2022 Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report, thus an additional revision and submittal by HEP to the OCD will not be required. The primary change to the October 2022 report requested by OCD is the additional weekly system O&M following installation and startup (1-2 months rather than 2-3 weeks). HEP does not expect to receive a response or approval of the C-108/Class V permits provided in the October 12, 2022 Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report in order to enact the proposed full-scale bioventing remedy. Please let me know if I've missed or mischaracterized any of our items of discussion.

Again, thank you for taking the time to review the bioventing results and recommendations with us.

**Jared Stoffel, P.G.**  
Project Manager

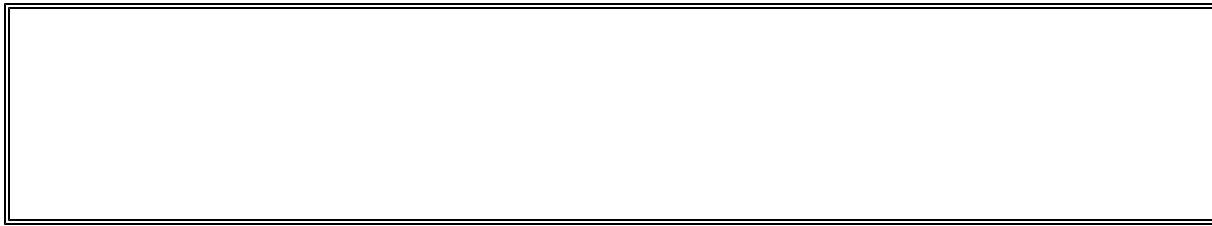


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**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Thursday, December 1, 2022 3:44 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal

Forms (NOY1822242858)



Hello Jared

We are available for a discussion December 6, 2022 Tuesday at 3pm MST. Please send us an evite.

Thanks

Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Thursday, December 1, 2022 2:03 PM

**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>

**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Pearson, Christopher <[CPearson@trccompanies.com](mailto:CPearson@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Jennifer –

Thank you for discussing the WTX to EMSU site with me yesterday. As we discussed, we have already completed the excavation, soil boring installation, and bioventing pilot test activities as approved by Chad Hensley on April 5, 2022. The most recently submitted report (submitted on October 12, 2022) documents the excavation, soil boring, and the results of the bioventing pilot test and provides recommendations for the full-scale bioventing system. I've attached the report for reference – I know there have been multiple submissions for this Site, and want to ensure that we both are referencing the same document.

In order to facilitate our additional discussion of what has occurred to date and answer any questions regarding the bioventing pilot test results, we would like to conduct a meeting with you and your team. Our team's availability (cc'd in this email) for this week and next week include:

December 2: any time of day  
December 5: After 4 MST  
December 6: After 3 MST  
December 7: After 2:30 MST  
December 9: After 2 MST

Would any of these days and times work for you? If so, I will set up a Teams meeting at your preferred time. Thank you very much!

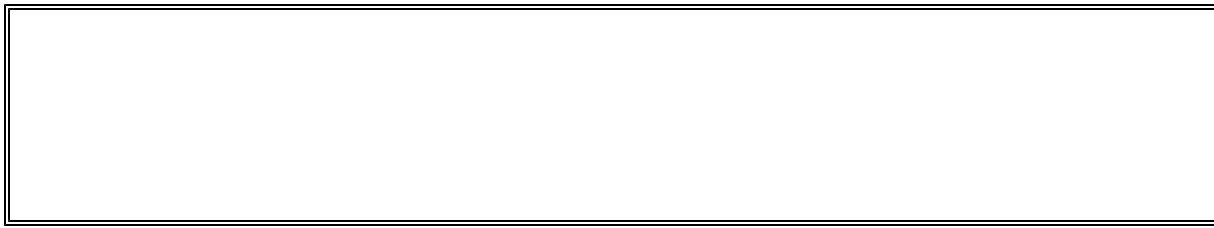
**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>  
**Sent:** Monday, November 28, 2022 11:12 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Hello Jared

I wanted to let you know that the Remediation Plan for the above-referenced site detailing a pilot test for bioventing has been approved with conditions. OCD has approved the proposed excavation activities and the advancement of a soil boring. In addition, OCD has approved the implementation of a pilot test for bioventing. However, please do not proceed with the full scale implementation of the bioventing system until OCD has had the opportunity to review the pilot test data to evaluate effectiveness of a full scale system. Please schedule a meeting with OCD after the pilot test has been completed so we can go over the data.

Also, at this time you are not required to submit a C-108 form or a EPA UDS Sheet. That will need to be addressed once full scale implementation is approved. Please let me know if you have any questions.

Thanks,

**Jennifer Nobui, PG** • Environmental Specialist A  
Environmental Bureau  
EMNRD - Oil Conservation Division  
5200 Oakland Avenue N.E Suite 100 | Albuquerque, NM 87113  
505.470-3407 | [Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Thursday, October 13, 2022 11:24 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@emnrd.nm.gov](mailto:Jennifer.Nobui@emnrd.nm.gov)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@emnrd.nm.gov](mailto:Bradford.Billings@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@emnrd.nm.gov](mailto:Jocelyn.Harimon@emnrd.nm.gov)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Jennifer,

I wanted to provide an update that the report documenting the pilot test and soil remediation activities along with the full-scale bioventing system recommendations has been submitted through the portal. Please let me know if you have any questions that arise during your review. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>  
**Sent:** Tuesday, August 23, 2022 5:34 PM  
**To:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Thanks Gilbert for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thanks,  
Jennifer Nobui

---

**From:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>  
**Sent:** Tuesday, August 23, 2022 4:31 PM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Good Afternoon Jennifer,

Based on the initial confirmation soil sample analytical results for the excavation performed on August 17 and 18, additional remedial excavation and sampling will be conducted at the site on Thursday, August 25.

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

Thanks!

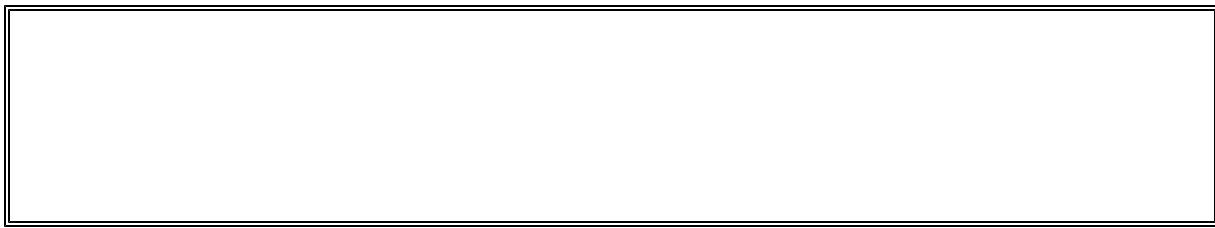
Bryan Gilbert, P.G.  
Austin Office ECW Practice Leader



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---

**From:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>  
**Sent:** Wednesday, August 17, 2022 1:59 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarneill@trccompanies.com](mailto:RVarneill@trccompanies.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Harimon, Jocelyn, EMNRD <[Jocelyn.Harimon@state.nm.us](mailto:Jocelyn.Harimon@state.nm.us)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Thank you Jared for the notification.

Please include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Please let us know if you encounter any delays or have any questions.

Thanks,  
Jennifer Nobui

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Friday, August 12, 2022 12:49 PM  
**To:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Varnell, Richard <[RVarneill@trccompanies.com](mailto:RVarneill@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to follow up on our notification of the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities with an updated timeline. Field activities were projected to be completed by August 12. An updated timeline is provided below.

- Bioventing Pilot Test - Field activities began on August 3, 2022, but the pilot test did not commence until August 9 (Day 1) due to equipment issues and troubleshooting. The pilot test is anticipated to be complete on August 15 (Day 7).
- Soil Boring – Drilling was originally scheduled for August 8. Due to a change in drill rig availability (the drill rig scheduled for the work was not operational), drilling is now scheduled for August 15.
- Quarterly Groundwater Monitoring – Due to the revised bioventing pilot test schedule (the monitoring wells cannot be gauged and sampled during the pilot test), quarterly groundwater monitoring activities are scheduled to begin August 16. This is a slight deviation from the schedule presented in the April 2022 Remediation Work Plan Addendum, which indicated quarterly groundwater monitoring would commence within 90 days of NMOCD approval of the Work Plan (i.e., August 13). Groundwater monitoring activities are expected to take 1 – 2 days.
- Remedial Excavation and Sampling – Due to the revised bioventing pilot test and quarterly groundwater monitoring schedules, remedial excavation and sampling activities are scheduled for August 17 to 19.

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

**Jared Stoffel, P.G.**  
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
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---

**From:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Sent:** Thursday, August 4, 2022 11:48 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

---

Hi,

Thank you for notification. Please keep this communication and include in allied report(s).

Bradford Billings  
EMNRD/OCD

---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Monday, August 1, 2022 10:29 AM  
**To:** Nobui, Jennifer, EMNRD <[Jennifer.Nobui@state.nm.us](mailto:Jennifer.Nobui@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

All,

I would like to submit a notification that the pilot test, soil boring activities, remedial excavation activities, and quarterly groundwater sampling activities are all scheduled to begin this week on August 3, 2022. The activities are projected to be completed within 2 weeks. This email is intended to notify you of both the remedial and monitoring activities occurring onsite and the collection of final samples from the remedial excavation during this time period in accordance with NMAC 19.15.29.12 D(1)(a). Please let me know if there are any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



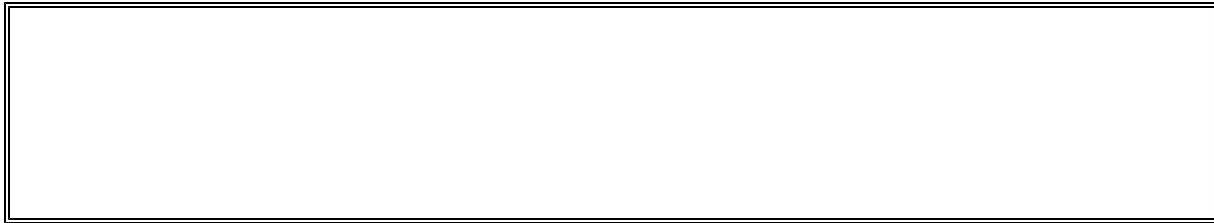
505 E Huntland Dr STE 250 Austin, TX 78752  
F: 512 329 8750 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>  
**Sent:** Thursday, April 7, 2022 8:16 AM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>;

Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Jared,

Good morning. The approval is for UIC and the remediation.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Sent:** Wednesday, April 6, 2022 3:42 PM

**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>

**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

Chad,

We would like to clarify if this also includes the approval of the injection permits, or if that come separately from the Underground Injection group? Pending approval of the injection permits, as needed, we will proceed with field work following the completion of calving season as requested by the landowner. We will notify you when calving season has completed and the landowner has given us permission to access the property. Thank you very much for the approval to proceed and the additional clarification with regards to the injection permitting process.

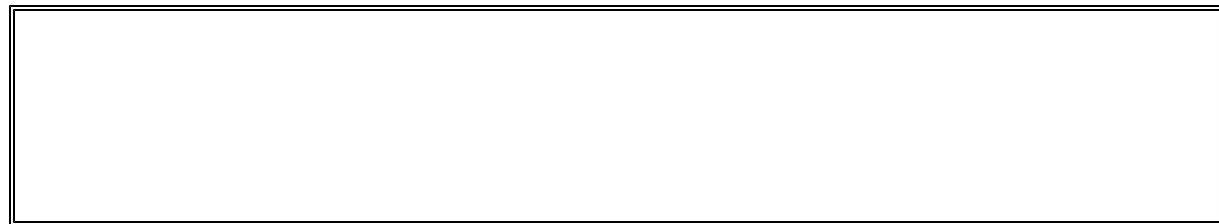
**Jared Stoffel, P.G.**  
Project Manager



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---

**From:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>  
**Sent:** Tuesday, April 5, 2022 4:42 PM  
**To:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)



Jared,

The OCD approves this workplan. Please proceed with the project.

Cheers,

**Chad Hensley** • Environmental Science & Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division

811 First St. | Artesia, NM 88210  
Office: 575.748.1283 | Cell: 575-703-1723  
[chad.hensley@state.nm.us](mailto:chad.hensley@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Friday, April 1, 2022 2:59 PM  
**To:** Hensley, Chad, EMNRD <[Chad.Hensley@state.nm.us](mailto:Chad.Hensley@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Trevor.baird <[Trevor.baird@hollyenergy.com](mailto:Trevor.baird@hollyenergy.com)>; mark.shemaria <[mark.shemaria@hollyenergy.com](mailto:mark.shemaria@hollyenergy.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Helbert, Dana <[DHelbert@trccompanies.com](mailto:DHelbert@trccompanies.com)>; Hoover, Shannon <[SHoover@trccompanies.com](mailto:SHoover@trccompanies.com)>; Varnell, Richard <[RVarnell@trccompanies.com](mailto:RVarnell@trccompanies.com)>  
**Subject:** [EXTERNAL] WTX to EMSU Remediation Plan Addendum, C-108, and Associated Federal Forms (NOY1822242858)

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Mr. Hensley and Mr. Bratcher,

Please see the attached addendum to the NMOCD-approved November 12, 2021, *Site Characterization Report and Remediation Workplan* for the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). Included in the appendices are the requested C-108 form and associated federal underground injection form. Please let us know if you require any additional information. Otherwise we will stand by for NMOCD's approval of the Remediation Workplan Addendum and the authorization to inject.

Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**From:** [Hamlet, Robert, EMNRD](#)  
**To:** [Stoffel, Jared](#)  
**Cc:** [Gilbert, Bryan](#); [Clark, Darija](#); [Leik, Jason](#); [Melanie Nolan](#); [Bratcher, Michael, EMNRD](#); [Buchanan, Michael, EMNRD](#); [Wells, Shelly, EMNRD](#); [Velez, Nelson, EMNRD](#)  
**Subject:** [EXTERNAL] WTX to EMSU 90-Day Extension Request - (NOY1822242858)  
**Date:** Monday, November 20, 2023 10:14:47 AM  
**Attachments:** [image003.png](#)

---

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RE: Incident #**NOY1822242858**

**Jared,**

Your request for an extension to **February 14, 2023** is approved. This will be the **final extension** for this release. Please include this e-mail correspondence in the remediation and/or closure report.

**Robert Hamlet** • Environmental Specialist - Advanced  
 Environmental Bureau  
 EMNRD - Oil Conservation Division  
 506 W. Texas Ave. | Artesia, NM 88210  
 575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



**From:** Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>  
**Sent:** Thursday, November 16, 2023 12:29 PM  
**To:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Leik, Jason <[Jason.Leik@hollyfrontier.com](mailto:Jason.Leik@hollyfrontier.com)>; Melanie Nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>  
**Subject:** [EXTERNAL] WTX to EMSU 90-Day Extension Request - (NOY1822242858)

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Mike-

Thank you for talking with me yesterday afternoon regarding our power issues out at the WTX to EMSU Site. I have attached the summary email I sent in early November 2023 for reference.

Since early November 2023, HEP has determined that the Xcel Energy easement from the east

across the Byrd property is unlikely to be resolved in a timely manner and we are pursuing other options. The energy provider, Xcel Energy, has identified a second line approximately twice as far away to the south, which may be an alternate route for the Xcel Energy easement and electrical power drop to the Site. HEP is working with Xcel to determine if this is a feasible option (it does appear that it may be at least partially on State Trust Lands, which slows the easement process) to provide electrical power to the Site by the end of the first quarter of 2024. If by mid-December 2023, Xcel and HEP have not established a definitive timeline for electrical power to the Site, HEP will approach the Site landowner (Kleins) about alternative methods of power – previously, the Kleins were not enthusiastic about a large footprint for remediation infrastructure and didn't like the idea of a propane tank on their property. We will inform NMOCD of the intended path forward during December 2023. HEP is committed to driving the remediation forward and have targeted system startup during the first quarter of 2024.

HEP respectfully requests a 90-day extension to February 14, 2023. We will continue to update you as we progress through the Xcel Energy electrical power drop or alternative power method. Thank you very much.

**Jared Stoffel, P.G.**

Project Manager



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**From:** [Hamlet, Robert, EMNRD](#)  
**To:** [Gilbert, Bryan](#)  
**Cc:** [Clark, Darija](#); [Stoffel, Jared](#); [Leik, Jason](#); [Melanie Nolan](#); [Bratcher, Michael, EMNRD](#); [Wells, Shelly, EMNRD](#); [Velez, Nelson, EMNRD](#)  
**Subject:** [EXTERNAL] WTX to EMSU (NOY1822242858) - Bioventing System Update  
**Date:** Thursday, February 15, 2024 11:25:53 AM  
**Attachments:** [image003.png](#)

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Gilbert,

Please include Nelson Velez on any Lea County incidents. He will be the reviewer for this particular incident. Regards

**Robert Hamlet** • Environmental Specialist - Advanced Environmental Bureau  
EMNRD - Oil Conservation Division  
506 W. Texas Ave. | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>  
**Sent:** Wednesday, February 14, 2024 5:36 PM  
**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Cc:** Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Leik, Jason <[Jason.Leik@HollyEnergy.com](mailto:Jason.Leik@HollyEnergy.com)>; Melanie Nolan <[Melanie.Nolan@hollyenergy.com](mailto:Melanie.Nolan@hollyenergy.com)>  
**Subject:** [EXTERNAL] WTX to EMSU (NOY1822242858) - Bioventing System Update

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RE: Incident #**NOY1822242858**

All,

We wanted to provide an update on the status of the bioventing system at the WTX to EMSU site. Xcel Energy was unable to procure an easement for an alternate route for a power drop for the proposed bioventing system. With the intention of complying with NMOCD's August 21, 2023, request that an alternative system power source be considered and per HEP's November 16, 2023,

extension request, HEP has switched to a propane-powered system design. The overall operation and capability of the bioventing system will remain consistent with that proposed in the NMOCD-approved October 2022 *Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report* – only the power source for the compressor has changed. HEP has begun procuring the system equipment. Notably, several system components have been installed at the site, including the bioventing wells, propane tank pads, system shed, and additional system fencing. The air compressor has been ordered but has the longest lead time, now estimated by the manufacturer for delivery to the site in mid-April 2024. Upon delivery of the air compressor, the system is anticipated to be operational by the end of the following week.

We will continue to update you through the system installation process. In the meantime, please let us know if you have any questions.

Thank you,

Bryan Gilbert, P.G.  
Austin Office ECW Practice Leader



505 E. Huntland Drive, Suite 250, Austin, TX 78752

C: 925.699.6184 | F: 512.329.8750

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**Clark, Darija**

---

**Subject:** Notification of LNAPL on Groundwater at NOY1822242858 (WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release)

---

**From:** Stoffel, Jared

**Sent:** Monday, March 11, 2024 10:07 AM

**To:** [Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)

**Cc:** [Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov); Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; melanie.nolan <[melanie.nolan@hollyenergy.com](mailto:melanie.nolan@hollyenergy.com)>

**Subject:** Notification of LNAPL on Groundwater at NOY1822242858 (WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release)

Mr. Buchannon,

During quarterly groundwater monitoring activities in association with an active remediation Site – WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release (NOY1822242858), the remediation wells for the bioventing system were gauged as part of the system installation process. During this gauging, approximately 1 foot of LNAPL was discovered on the groundwater surface of this well. We are trying to confirm the provenance of the LNAPL, but wanted to ensure we provided the NMOCD notification of the discovery. I discussed via phone call with Nelson Velez, who is in charge of our incident, on March 8, 2024 and he indicated that I should also notify you via email, and the next business day (Monday) was acceptable. Please let me know what additional information beyond this notification you may need. I am available at your convenience to discuss via phone at the cell listed below as needed. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**Clark, Darija**

---

**Subject:** Notification of LNAPL on Groundwater at NOY1822242858 (WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release)  
**Attachments:** 8\_497744\_8\_Full Scale Map\_Final to NMOCD.pdf

---

**From:** Stoffel, Jared  
**Sent:** Monday, March 18, 2024 2:10 PM  
**To:** [Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)  
**Cc:** Velez, Nelson, EMNRD <[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>; Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>  
**Subject:** FW: Notification of LNAPL on Groundwater at NOY1822242858 (WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release)

Michael,

In a follow-up discussion with Nelson, he indicated that you would like additional information regarding the LNAPL observed at the WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release Site (NOY1822242858). The water table is present beneath the site at depths of 37 to 39 feet below ground surface and the hydraulic gradient is to the south-southeast. On March 8, 2024, 1.00 feet of LNAPL was measured in the deep interval of nested bioventing well BV-3 (i.e., BV-3D; the other nested intervals for well BV-3 do not intersect the water table). This is the first time LNAPL has been measured in bioventing well BV-3D, which was installed in May of 2023. Additionally, 0.01 feet of LNAPL was measured in monitoring well MW-1 on March 8, 2024. LNAPL (0.01 feet) was first measured in monitoring well MW-1 on September 14, 2023 and MW-1 continued to exhibit 0.01 feet of LNAPL during the December 2023 event. LNAPL was not detected in MW-02, MW-03, MW-04, MW-05, BV-1D and BV-2D during any monitoring event, including the March 2024 event. Attached is a figure that shows the locations of the monitoring and bioventing wells at the site.

We are continuing to evaluate a path forward, but wanted to ensure we were responsive to the requests for information in correspondence with Nelson.

Please let me know if there is any additional information that is needed at this time – I am available at your convenience to discuss. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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**Clark, Darija**

**Subject:** [EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 336869

---

**From:** [OCDOOnline@state.nm.us](mailto:OCDOOnline@state.nm.us) <[OCDOOnline@state.nm.us](mailto:OCDOOnline@state.nm.us)>

**Sent:** Tuesday, June 11, 2024 2:08 PM

**To:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>

**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 336869

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To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has approved the submitted *Ground Water Abatement* (GROUND WATER ABATEMENT), for incident ID (n#) nOY1822242858, with the following conditions:

- **Review of the 2023 Annual Groundwater Monitoring Report for WTX to EMSU Battery to Byrd Pump Segment: Content Satisfactory** 1. Continue to conduct groundwater monitoring at the site for all wells on a quarterly basis, as well as gauging LNAPL. 2. Propose an abatement plan to OCD if LNAPL is persistent in wells, as absorbent socks are not considered an abatement method. 3. Submit the 2024 Groundwater Monitoring report with recommendations to OCD for an abatement path forward by May 1, 2025.

The signed GROUND WATER ABATEMENT can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,  
Michael Buchanan  
Environmental Specialist  
505-490-0798  
[Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505

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**Clark, Darija**

---

**Subject:** FW: WTX to EMSU (NOY182224858) Bioventing System Update

---

**From:** Stoffel, Jared

**Sent:** Thursday, June 20, 2024 3:01 PM

**To:** Buchanan, Michael, EMNRD <[Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)>

**Cc:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Clark, Darija <[dclark@trccompanies.com](mailto:dclark@trccompanies.com)>; Sahba, Arsin M.

<[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>; Leik, Jason

<[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Velez, Nelson, EMNRD

<[Nelson.Velez@emnrd.nm.gov](mailto:Nelson.Velez@emnrd.nm.gov)>

**Subject:** WTX to EMSU (NOY182224858) Bioventing System Update

All,

At the WTX to EMSU Site (NOY182224858), the full-scale bioventing system proposed in the October 12, 2022, *Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendations Report* (Report) and approved by NMOCD on November 28, 2022, has been installed and activated and the first operations and maintenance (O&M) event has been conducted. In accordance with the October 2022 Report and December 12, 2022, e-mail to NMOCD, O&M will be conducted on a weekly basis for the first one to two months. HEP will evaluate the weekly O&M data after one month of operation and will use this data to determine if a second month of weekly O&M is appropriate. Thereafter, O&M events will then be conducted at least monthly. Installation of the bioventing system and O&M events conducted in 2024 will be documented in an annual report to be submitted to NMOCD within 120 days of the end of the calendar year as outlined in the October 2022 Report. Please let me know if you have any questions or concerns. Thank you.

**Jared Stoffel, P.G.**  
Project Manager



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F: 512 329 8750 | C: 432 238 3003

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**Clark, Darija**

---

**Subject:** WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release (NOY1822242858)  
**Attachments:** 8\_497744\_8\_Full Scale Map\_Final to NMOCD.pdf

---

**From:** Stoffel, Jared  
**Sent:** Monday, November 4, 2024 5:50 PM  
**To:** Buchanan, Michael, EMNRD <[Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)>  
**Cc:** Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>; Richardson, Paul <[Paul.Richardson@HFSinclair.com](mailto:Paul.Richardson@HFSinclair.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>  
**Subject:** WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release (NOY1822242858)

Michael,

Thank you very much for giving me a call back on our project last week.

The site we were discussing is called WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release (NOY1822242858). I'll just call it WTX to EMSU going forward for brevity. HEP is currently enacting an NMOCD approved workplan with bioventing as the remedy for elevated hydrocarbon concentrations in the soils. When the workplan was approved (November 28, 2022) there was no LNAPL present onsite, and the groundwater was being monitored only on a precautionary measure while the soil remedy was enacted.

However, a small amount of LNAPL was detected in MW-1 before the bioventing system was installed (we had a substantial delay due to power access to the remote site). On March 8, 2024, approximately one (1) foot of LNAPL was detected in one of the deep bioventing wells (BV-3D). We started abatement activities at this time utilizing biweekly hand bailing LNAPL removal, but continued to proceed with bioventing system installation consistent with the approved workplan. The bioventing system was started on May 30, 2024.

During the most recent abatement event last week, LNAPL was detected in BV-1D, which marks the third well with LNAPL present onsite. Since the site conceptual model has changed with multiple wells containing LNAPL, HEP is re-evaluating the site to determine the most appropriate remedy based on the current site data. This re-evaluation will be focused more on LNAPL abatement. Due to mechanical issues, the propane powered bioventing system is currently down and will likely remain down until the site re-evaluation and abatement plan is completed. Per your portal response to the 2023 Annual Groundwater Monitoring Report, the abatement plan is due May 1, 2025. In the interim, HEP will continue to manually abate the LNAPL in the wells with LNAPL present (currently MW-1, BV-1D, and BV-3D) on a biweekly schedule and will be adding a belt skimmer pump into well BV-3D by the end of 2024 to boost abatement efforts and provide additional data for the abatement plan.

Please let us know if you concur with HEP's interim approach. I've attached the general site map with well locations for your reference. We are available at your convenience to discuss in more detail. Thank you very much!

**Jared Stoffel, P.G.**  
Project Manager



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## APPENDIX C

### Chronology

# Chronology WTX to EMSU

DATE	FROM	TO	DESCRIPTION
July 11, 2018	--	--	A crude-oil gathering line release was identified at the Site during an aerial patrol. The gathering line was immediately inspected, the leak confirmed, and that segment of line was shut down for repair. The release was determined to originate from a pinhole at the bottom of the 6-inch line.
July 11-August 6, 2018	--	--	Excavation activities conducted to a maximum depth of 17 feet bgs. Crude oil-affected soil was not vertically delineated based on field screening or observations (not analytical data). The excavation was discontinued and the excavated soil was returned to the excavation as backfill.
August 10, 2018	HEP	NMOCD	Form C-141 (Release Notification and Corrective Action) submitted to Ms. Olivia Yu at the NMOCD District 1 Office in Hobbs, New Mexico.
August 16, 2018	GHD	NMOCD/BLM	Submitted a <i>Soil Delineation Work Plan</i> to NMOCD and the BLM. NMOCD approved the work plan on September 10, 2018.
September 2018	--	--	Initial assessment was completed and included the determination of Site-specific NMOCD Closure Criteria and installation of four soil borings (SB-1 through SB-4) to a maximum depth of 35 feet bgs. Although groundwater was not encountered during the investigation, the NMOCD Closure Criteria determined appropriate for the Site was for sites with groundwater at a depth of less than 50 feet bgs.
November 1, 2018	HEP	NMOCD	Submitted a <i>Soil Assessment Report and Supplemental Assessment Work Plan</i> (SAWP) to NMOCD. Approved by NMOCD on January 17, 2019. The scope of work proposed in the SAWP was delayed pending access agreement negotiations with the landowner.
March 2020	HEP	L&K Ranch	Executed access agreement between HEP and L&K Ranch, LLC (landowner), allowing HEP to proceed with the investigation activities proposed in the 2018 SAWP.
April 2020	HEP	NMOCD	Modified investigation scope was proposed to NMOCD as compared to what was proposed in the 2018 SAWP. Modified scope was provided to NMOCD by email on April 15, 2020, and in a <i>Remediation Plan and Status Update</i> letter submitted to NMOCD on April 29, 2020. NMOCD reviewed the Remediation Plan and Status Update and requested by email on August 26, 2020, that a revised C-141 Form be submitted for the Site.
September 23, 2020	HEP	NMOCD	Submitted a revised C-141 Form to NMOCD. NMOCD approved the C-141 Form with the condition that the release be horizontally delineated at the surface.
November 2-6, 2020	--	--	Four soil borings (SB-05 to SB-08) were installed to a depth of 50 feet bgs, and eight hand auger borings (SB-09 to SB-16) were installed to laterally delineate soil in the upper 4 feet around the release. Borings SB-05 through SB-08 were converted to monitoring wells MW-1 through MW-4, respectively.
December 22, 2020	TRC	NMOCD	Submitted the <i>Site Characterization Report</i> (SCR) to NMOCD. The SCR included recommendations to conduct additional lateral and vertical delineation of soil with TPH concentrations above the NMOCD Closure Criterion, sampling of existing Site monitoring wells, and installation and sampling of one upgradient monitoring well. None of

DATE	FROM	TO	DESCRIPTION
			the groundwater samples collected contained a detectable concentration of BTEX. The SCR was approved by NMOCD on December 31, 2020.
May 24-28, 2021	--	--	Eight borings (SB-18 through SB-25) were drilled. Based on field observations of potential hydrocarbon-affected soil, three additional borings (SB-26 through SB-28) were drilled to laterally delineate hydrocarbon-affected surface soil (upper 4 feet) and soil beneath 4 feet bgs. Boring SB-25 was converted to upgradient monitoring well MW-5.
July 12-16, 2021	HEP	NMOCD	HEP discussed the initial findings of the May 2021 assessment activities with NMOCD by telephone. HEP formally requested NMOCD authorization to perform additional assessment, including drilling of at least two borings and resampling of the five monitoring wells, by email dated July 16, 2021. None of the groundwater samples collected contained a detectable concentration of BTEX.
October 5-12, 2021	--	--	Drilled three borings (SB-29, SB-30, and SB-31) using a Sonic drill rig to laterally delineate hydrocarbon-affected soil beneath 4 feet bgs east and northeast of the release point; and gauged and sampled existing monitoring wells MW-1 through MW-5 to assess groundwater quality beneath the Site. None of the groundwater samples collected contained a detectable concentration of BTEX.
November 12, 2021	TRC	NMOCD	Submitted <i>Site Characterization Report and Remediation Workplan</i> (SCR and RWP) to NMOCD documenting May and November 2021 investigation results and proposing shallow soil excavation, implementation of bioventing, quarterly groundwater monitoring, and annual reporting.
December 9, 2021	NMOCD	HEP	Provided e-mail approval of the November 2021 SCR and RWP, including a request that an additional soil boring be drilled at existing boring location SB-19 and soil samples collected for analysis of BTEX.
January 18, 2022	NMOCD	HEP	NMOCD (Chad Hensley) submitted an email indicating NMOCD Form C-108 Application for Authorization to Inject with the appropriate federal forms (Class V) would be required for the pilot test but a public notice would not be required, and requesting additional information on the bioventing injection process, a system diagram of bioventing injection, and latitude and longitude information for the pilot test injection and observation wells.
January 25, 2022	--	--	A meeting was conducted between HEP, NMOCD, and TRC to discuss the NMOCD's December 2021 and January 2021 emails.
April 1, 2022	TRC	NMOCD	Submitted Remediation Workplan Addendum to NMOCD addressing NMOCD's December 2021 and January 2021 emails. The Remediation Workplan Addendum was approved by NMOCD on April 5, 2022.
August-September 2022	--	--	TRC implemented the Remediation Workplan Addendum, including advancement of boring SB-19A; excavation of affected surface soil to a depth 4.5 feet with TPH concentrations above the Closure Criterion; and performance of 7-day bioventing pilot test. Commenced quarterly groundwater monitoring on August 16, 2021 (samples to be analyzed for TPH only due to absence of BTEX above laboratory reporting limits).
October 12, 2022	TRC	NMOCD	Submitted the <i>Remediation and Bioventing Pilot Test Summary and Full-Scale Bioventing System Recommendation Report</i> to NMOCD. Report documented the work conducted from August-September 2022 and recommended implementation of full-scale bioventing at the

DATE	FROM	TO	DESCRIPTION
			Site NMOCD approved the proposed implementation of the bioventing system on December 13, 2022. It was anticipated that the system will be installed and activated during 2023 pending resolution of a power source.
December 2022-February 2024	--	--	HEP and TRC worked to install an electrical power drop at the Site for the proposed bioventing system. HEP made payment to Xcel Energy for electrical power drop in August 2023. As described in TRC's emails to NMOCD dated August 18, 2023, October 4, 2023, and November 16, 2023, HEP experienced difficulties arranging for the electrical power drop at the Site. Xcel Energy, the local electricity provider, was unable to procure an easement for the electrical power drop with adjacent property owners, so TRC and HEP evaluated alternative power sources for the planned bioventing system.
December 20, 2022	--	--	Conducted quarterly groundwater monitoring event.
February 22-23, 2023	--	--	Conducted quarterly groundwater monitoring event.
April 28, 2023	TRC	NMOCD	Submitted the 2022 Annual Groundwater Monitoring Report to NMOCD.
May 3-10, 2023	--	--	Installed four bioventing injection wells (BV-1 through BV-4) in accordance with the October 2022 Bioventing Recommendation Report.
June 20, 2023	--	--	Conducted quarterly groundwater monitoring event.
September 14, 2023	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL (0.01 feet) was detected in well MW-01; this was the first detection of LNAPL at the Site. The LNAPL was bailed and removed from the well. A sorbent sock was installed in well MW-01 after a gauging event on October 17, 2023.
September 14 and 21, 2023	TRC	NMOCD	Left voicemails for Michael Bratcher with NMOCD regarding presence of measurable LNAPL in well MW-01.
October 4, 2023	TRC	NMOCD	Submitted email to NMOCD (Michael Bratcher, Robert Hamlet, and Michael Buchanan) that measurable LNAPL was detected in well MW-01 during the September 2023 monitoring event.
December 13, 2023	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL (0.02 feet) was detected in well MW-01. Replaced sorbent sock in well MW-01.
February 14, 2024	TRC	NMOCD	Submitted email to NMOCD documenting HEP's intention to switch to a propane-powered bioventing system due to Xcel Energy's inability to provide an electrical power drop at the Site.
March 7-8, 2024	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL was detected in wells MW-01 (0.01 feet) and BV-3D (1.00 feet). Conducted manual LNAPL recovery via bailing in well BV-3D. Replaced sorbent in well MW-01.
March 8, 2024	TRC	NMOCD	Called Nelson Velez of NMOCD to notify him of presence of measurable LNAPL in well BV-3D. Nelson asked that TRC contact Michael Buchanan of NMOCD via email and provide additional information.
March 11 & 18, 2024	TRC	NMOCD	Submitted emails to NMOCD (Michael Buchanan) regarding measurable LNAPL detected in well BV-3D.

DATE	FROM	TO	DESCRIPTION
<b>March 2024-Current</b>	--	--	Conducted bi-weekly to monthly LNAPL recovery at wells with measurable LNAPL via bailing, replacement of sorbent socks and O&M of LNAPL skimmer pump.
April 29, 2024	TRC	NMOCD	Submitted the 2023 Annual Groundwater Monitoring Report to NMOCD.
April-May 2024	--	--	Installed propane-powered bioventing system at Site.
May 8-9, 2024	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL was detected in wells MW-01 (0.01 feet) and BV-3D (0.80 feet). Conducted manual LNAPL recovery via bailing in well BV-3D. Replaced sorbent in well MW-01.
May 30, 2024	--	--	Completed installation of propane-powered bioventing system and activated the system at wells BV-1, BV-2, BV-3, and BV-4.
June 11, 2024	NMOCD	HEP	NMOCD response to 2023 Groundwater Monitoring Report via <a href="mailto:OCDOnline@state.nm.us">OCDOnline@state.nm.us</a> documenting satisfactory groundwater monitoring and associated documentation and requesting 2024 Groundwater Monitoring Report and abatement plan submission by May 1, 2025.
June 2024	--	--	Conducted weekly bioventing system O&M visits for 3 weeks.
<b>June-November 2024</b>	--	--	Conducted bi-weekly to monthly bioventing system O&M visits. Bioventing system shut down in November 2024 pending a remedial evaluation and submittal of an Abatement Plan.
July 2, 2024	--	--	Conducted LNAPL transmissivity testing at well BV-3D.
August 26, 2024	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL was detected in well BV-3D (0.69 feet). Conducted manual LNAPL recovery via bailing in well BV-3D. Replaced sorbent in well MW-01.
October 23, 2024	--	--	During bioventing system O&M and LNAPL recovery event, measurable LNAPL (0.33 feet) was detected in well BV-1D for the first time (in addition to measurable LNAPL in wells MW-01 and BV-3D).
November 4, 2024	TRC	NMOCD	Submitted e-mail to NMOCD (Michael Buchanon) that the propane-powered bioventing system is not operational; the propane-powered bioventing system would not be restarted pending a remedial evaluation and submittal of an Abatement Plan by May 1, 2025; measurable LNAPL is present in wells MW-01, BV-1D, and BV-3D; that routine LNAPL recovery would continue; and that a belt skimmer pump would be installed in well BV-3D to increase LNAPL recovery.
November 21, 2024	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL was detected in wells MW-01 (0.08 feet) and BV-3D (0.61 feet). Conducted manual LNAPL recovery via bailing in well BV-3D. Replaced sorbent in well MW-01.
December 17, 2024	--	--	Installed and activated belt skimmer in well BV-3D to increase LNAPL recovery.
<b>December 2024-Current</b>	--	--	Conducted bi-weekly to monthly O&M on belt skimmer in well BV-3D. O&M conducted concurrent with manual LNAPL recovery activities.
March 10-11, 2025	--	--	Conducted quarterly groundwater monitoring event. Measurable LNAPL was detected in wells MW-01 (0.07 feet) and BV-1D (0.09 feet); no measurable LNAPL was detected in well BV-3D. Conducted manual LNAPL

DATE	FROM	TO	DESCRIPTION
			recovery via bailing in well BV-1D. Replaced sorbent in well MW-01. Performed O&M of belt skimmer in well BV-3D. None of the groundwater samples collected contained a detectable concentration of BTEX.

**Legend**

Release Response and Investigation Activities

Excavation and Pilot Testing Activities

Bioventing System Installation and O&amp;M Activities

Groundwater Monitoring and/or LNAPL Recovery Activities



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## APPENDIX D

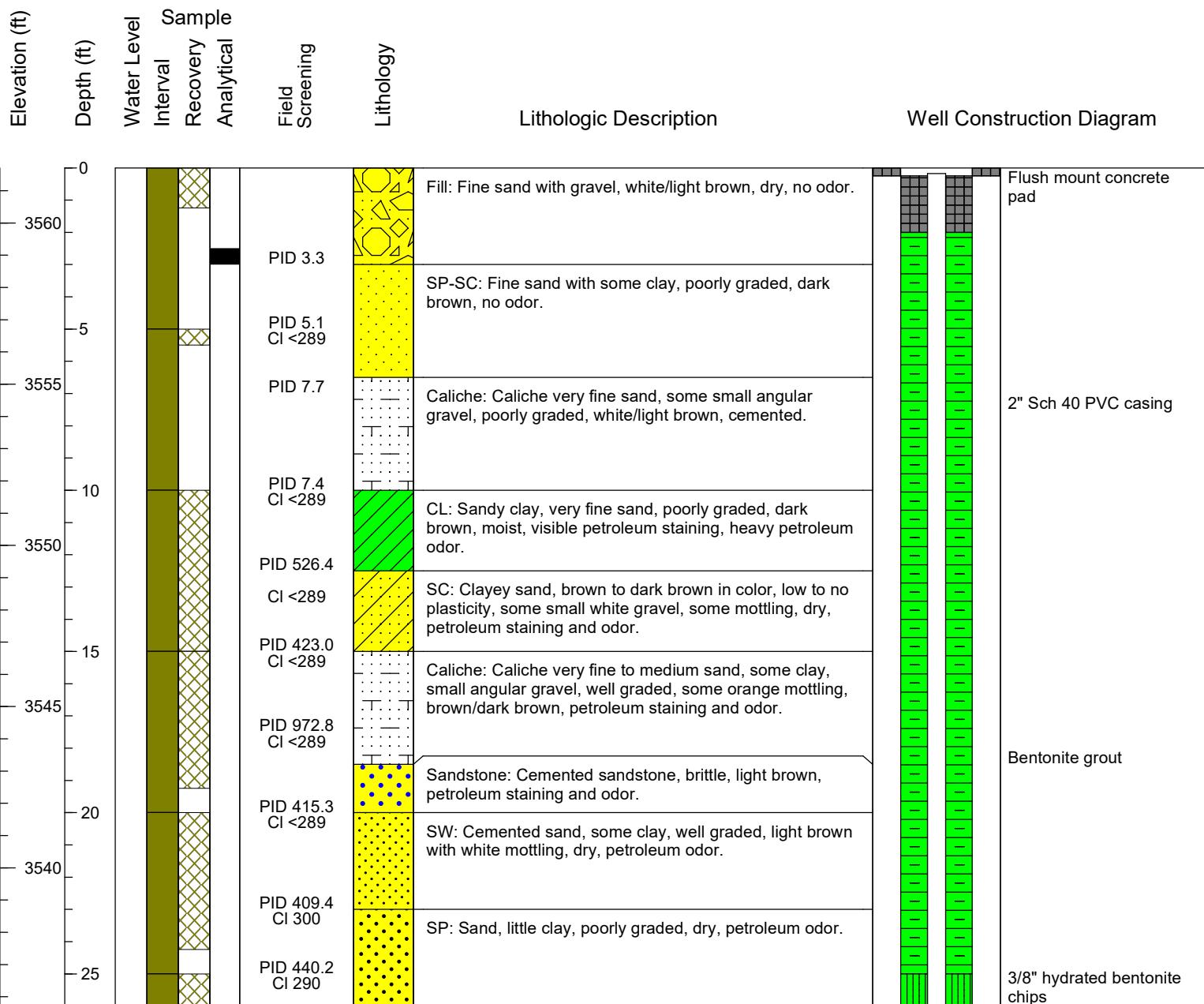
### Soil Boring and Well Construction Logs

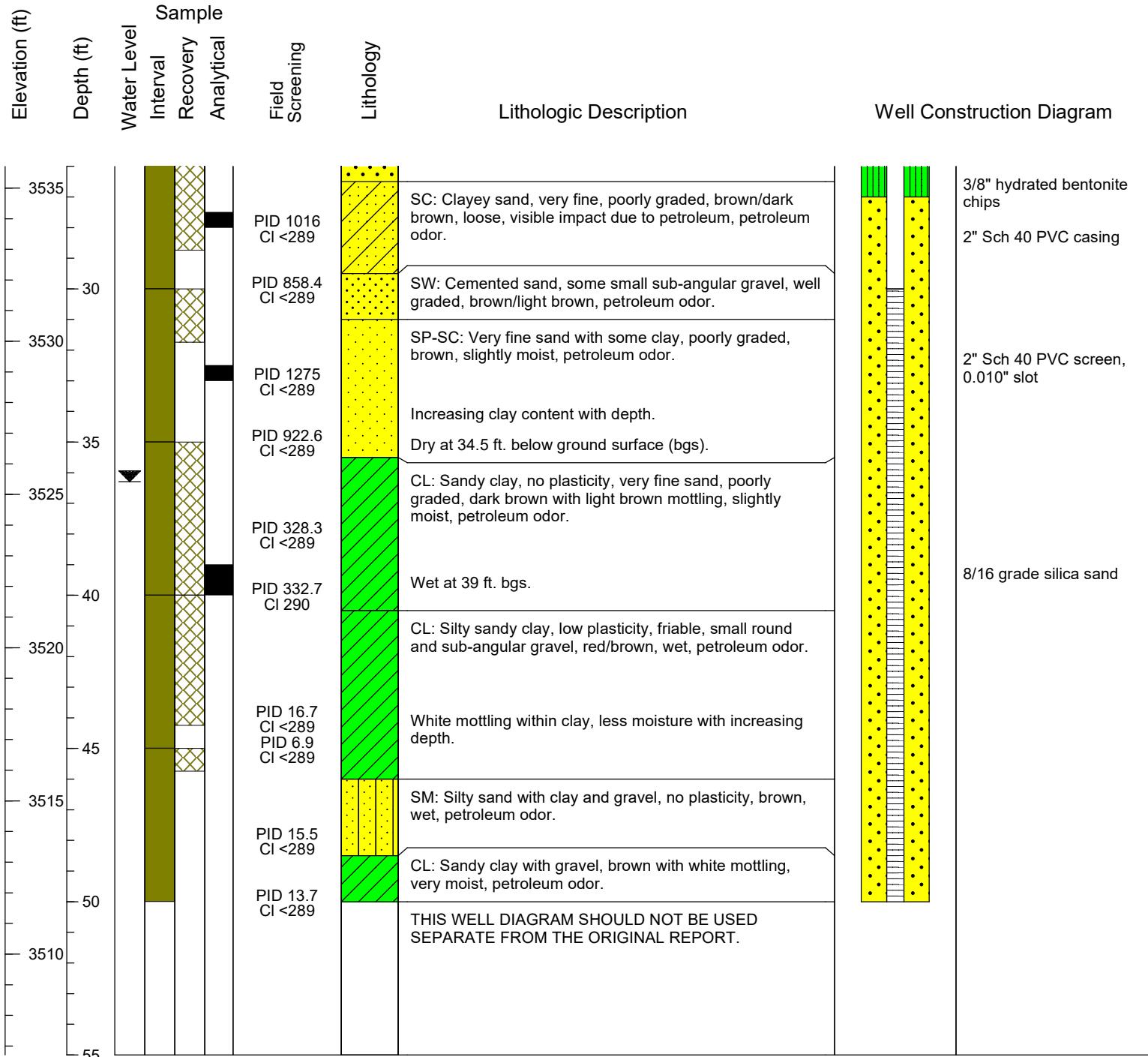


## **BORING LOG and WELL CONSTRUCTION**

# **MW-01 (SB-05)**

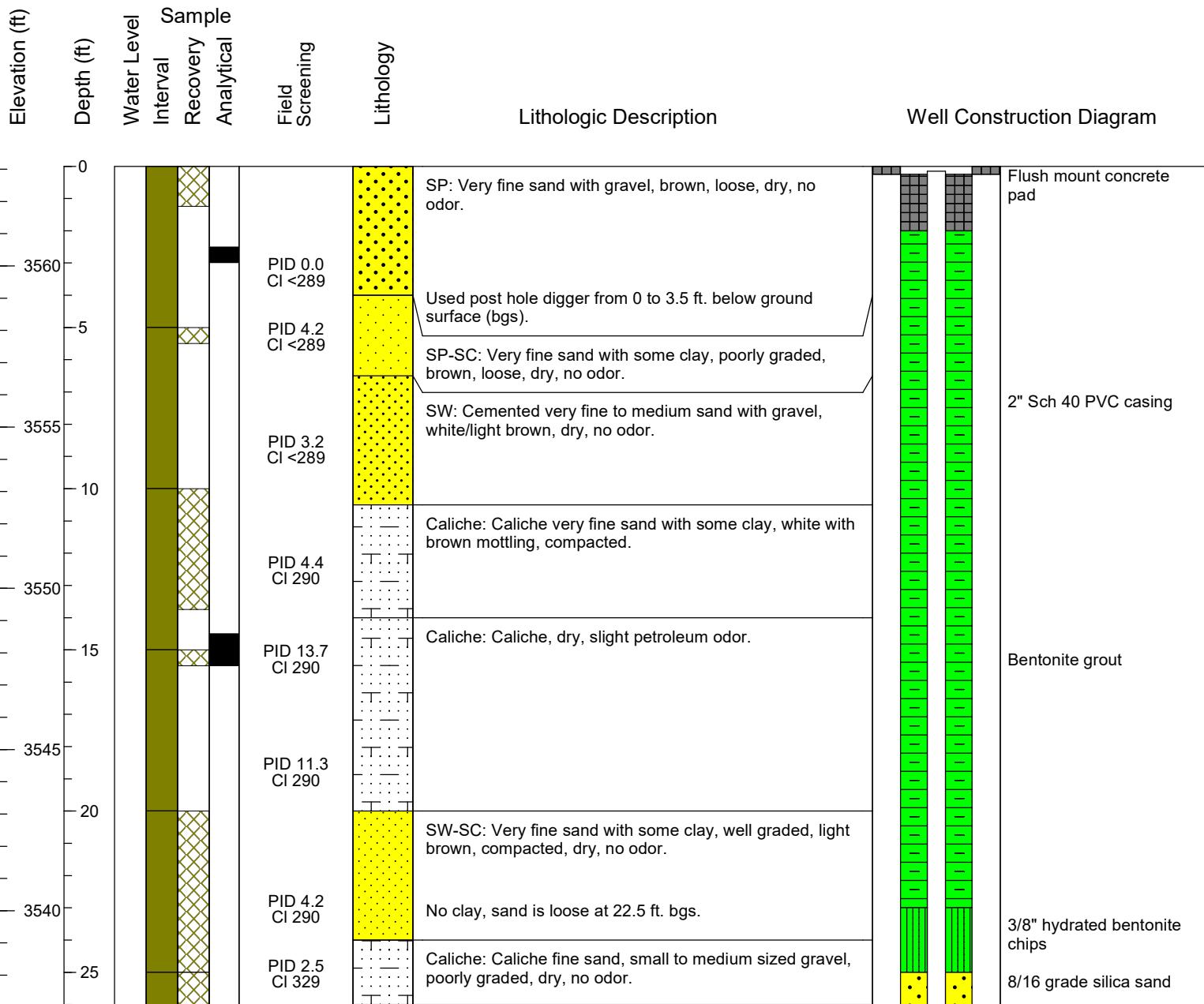
Client: Holly Energy Partners	TRC Project #: 374611
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release	Start Date: 11/03/2020
Address: Klein Ranch, Monument, NM	Finish Date: 11/03/2020
Project: Monitoring Well Installation	Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: Ronnie Rodriguez & crew
Drilling Method: Hollow Stem Auger	TRC Site Rep.: C. Gaston
Boring Diameter (in): 7.88	TRC Reviewer: R. Varnell
Boring Depth (ft bgs): 50	Coord. System: NAD 83
Sampling Method: Grab	Latitude: 32.583908
Blow Count Method: NA	Longitude: -103.317464
Field Screening Parameter: Volatile organic compounds / Chlorine	Elevation Datum: NAD 88
Meter: MiniRAE Lite / Chlorine QuanTab Test Strips	Ground Elevation (ft): 3561.71
Well Depth (ft bgs): 49.43	Well Elevation (ft): 3561.53
Casing Length (ft): 29.25	Well Measuring Point: Top of casing
Surface Completion: Flush mount concrete pad	Depth to Water (ft toc): 36.29
Well Development: Purged 55 gallons	Date/Time: 11/07/2020 16:00

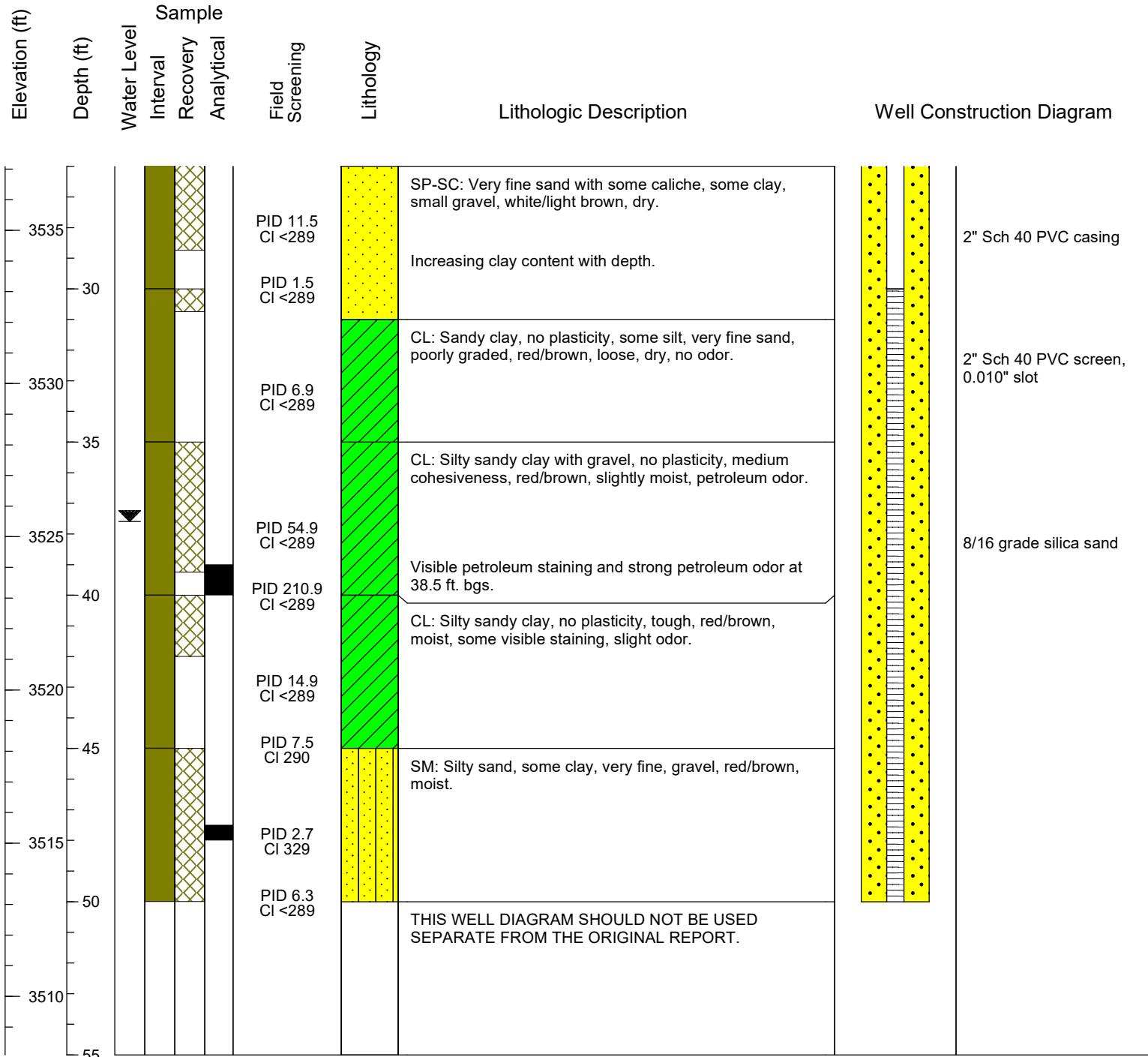





**BORING LOG and  
WELL CONSTRUCTION**
**MW-02 (SB-06)**

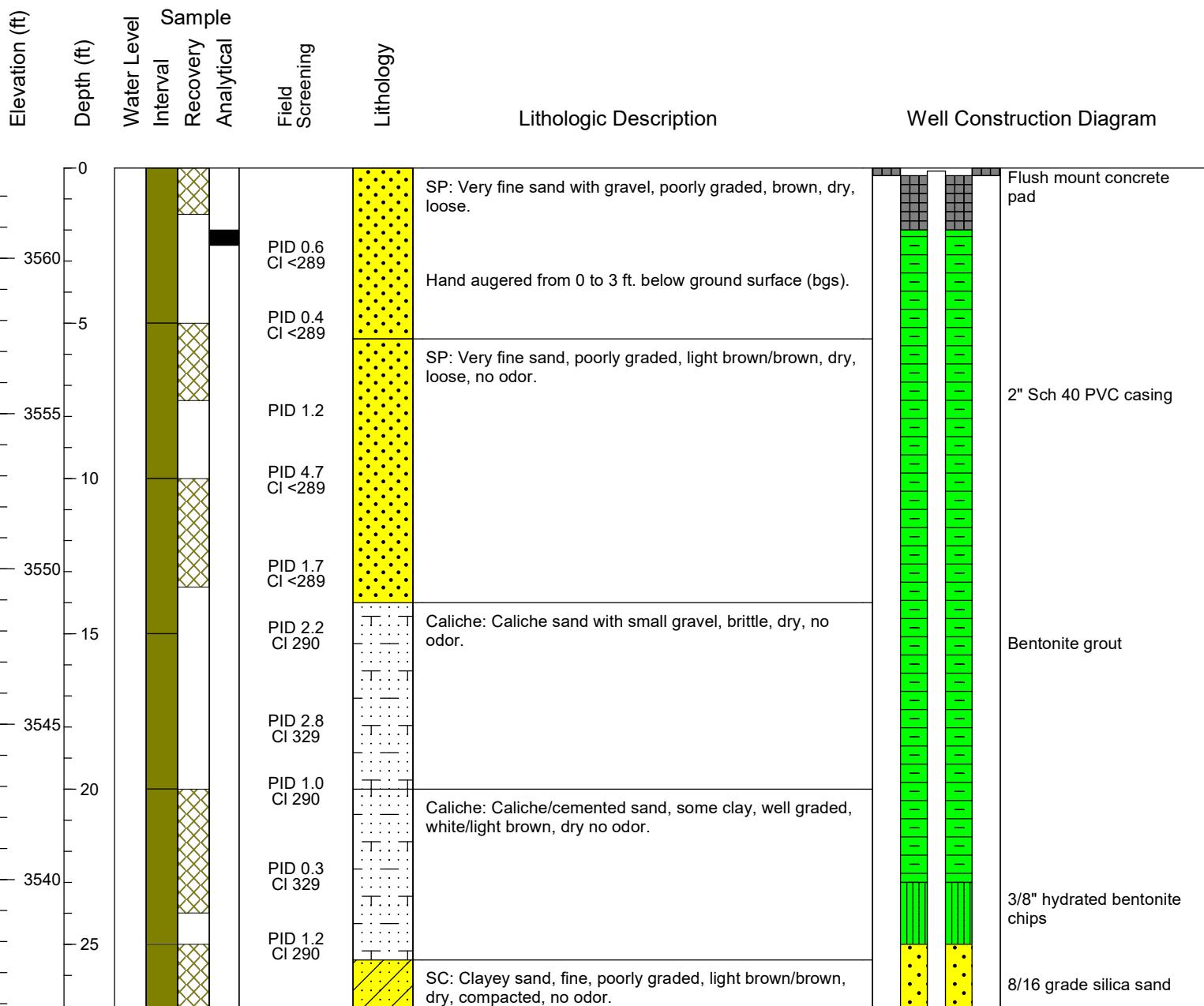
Client: Holly Energy Partners		TRC Project #: 374611
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 11/04/2020
Address: Klein Ranch, Monument, NM		Finish Date: 11/04/2020
Project: Monitoring Well Installation		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: Ronnie Rodriguez & crew	TRC Site Rep.: C. Gaston
Drilling Method: Hollow Stem Auger		TRC Reviewer: R. Varnell
Boring Diameter (in): 7.88	Boring Depth (ft bgs): 50	Coord. System: NAD 83
Sampling Method: Grab		Latitude: 32.584046
Blow Count Method: NA		Longitude: -103.317430
Field Screening Parameter: Volatile organic compounds / Chlorine		Elevation Datum: NAD 88
Meter: MiniRAE Lite / Chlorine QuanTab Test Strips	Units: ppm / ppm	Ground Elevation (ft): 3563.09
Well Depth (ft bgs): 49.64	Well Depth (ft toc): 49.49	Well Elevation (ft): 3562.94
Casing Length (ft): 29.49	Screen Length (ft): 20.0	Well Measuring Point: Top of casing
Surface Completion: Flush mount concrete pad		Depth to Water (ft toc): 37.59
Well Development: Purged 55 gallons		Date/Time: 11/07/2020 13:45

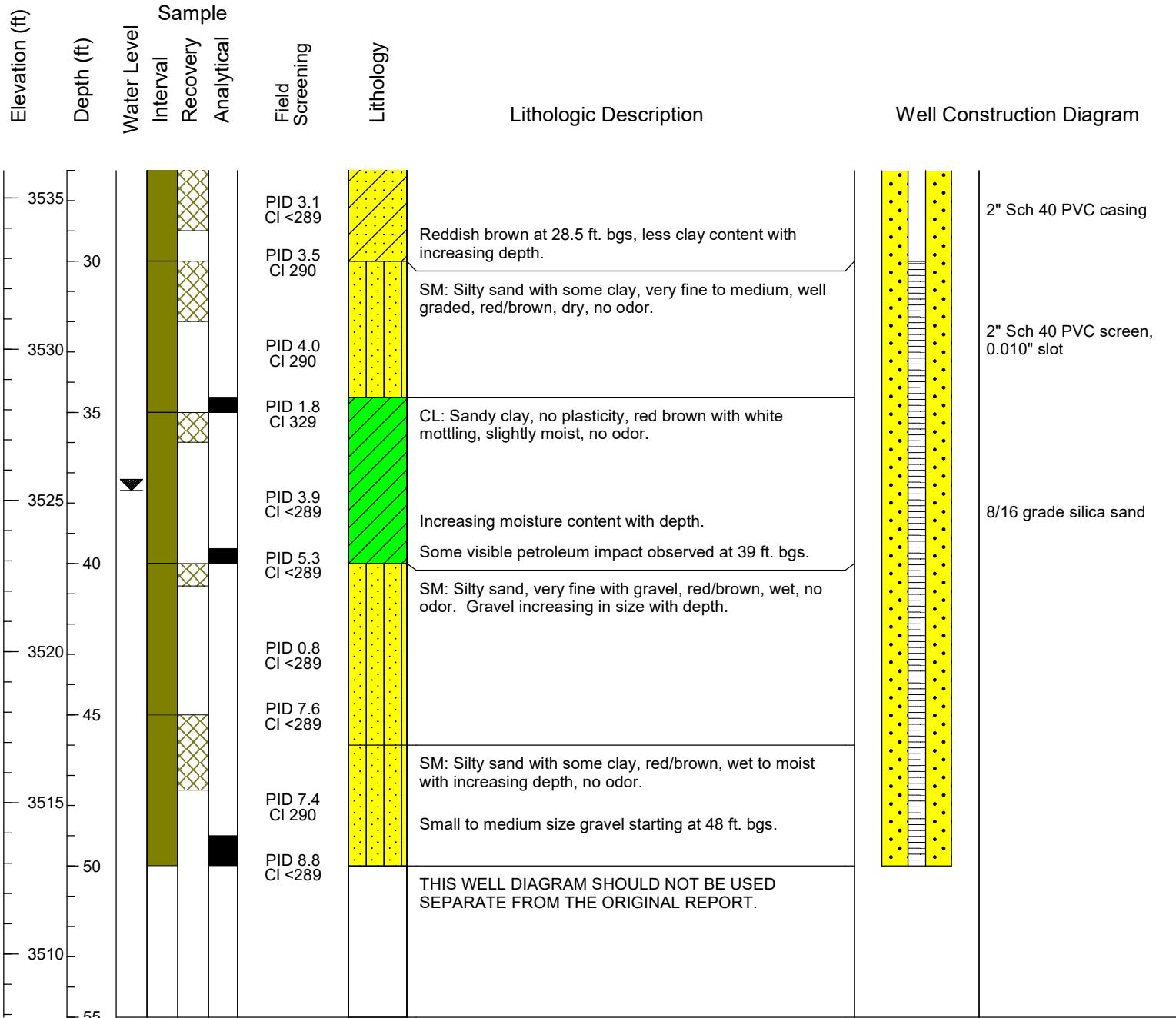





**BORING LOG and  
WELL CONSTRUCTION**
**MW-03 (SB-07)**

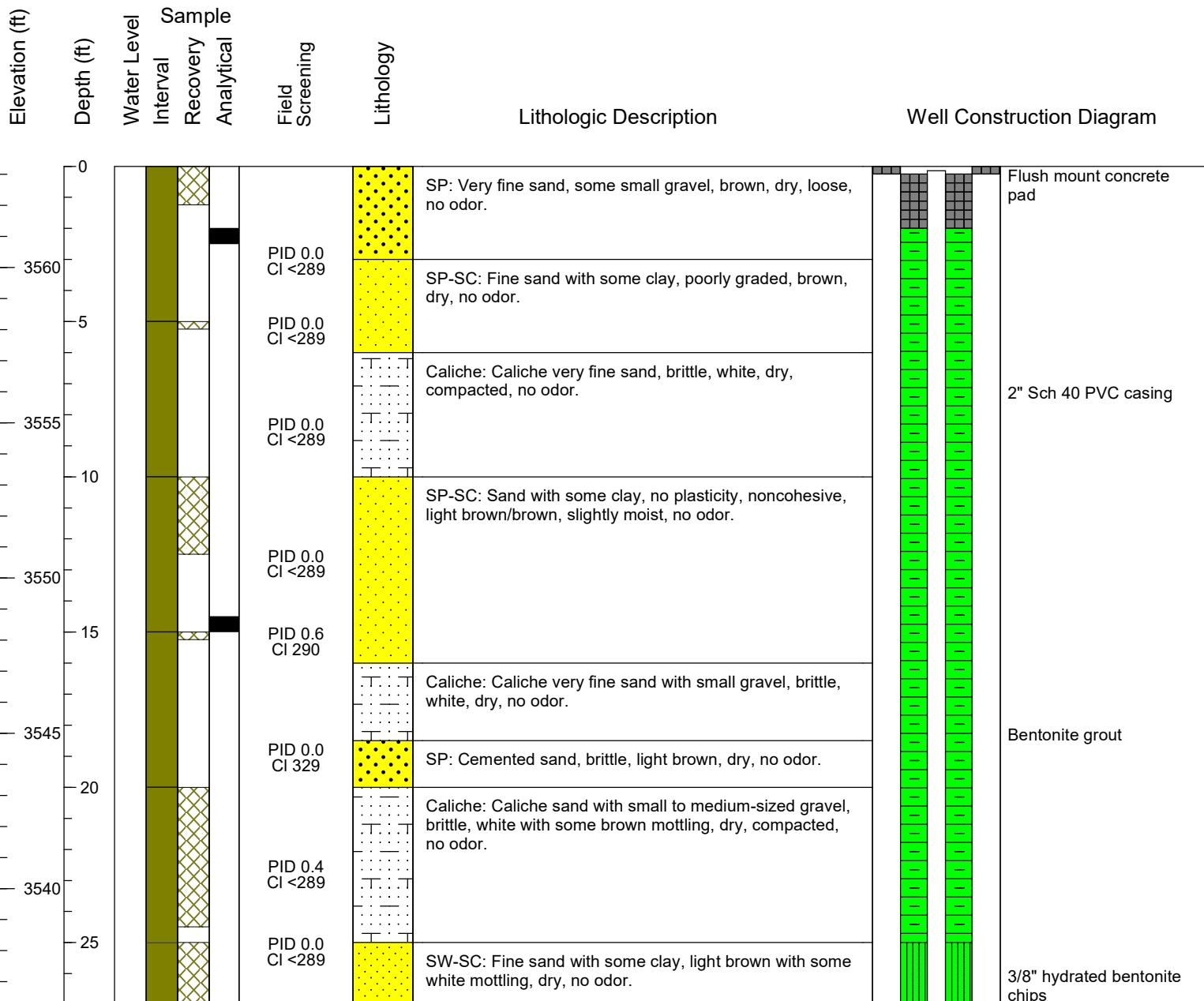
Client: Holly Energy Partners		TRC Project #: 374611
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 11/04/2020
Address: Klein Ranch, Monument, NM		Finish Date: 11/04/2020
Project: Monitoring Well Installation		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: Ronnie Rodriguez & crew	TRC Site Rep.: C. Gaston
Drilling Method: Hollow Stem Auger		TRC Reviewer: R. Varnell
Boring Diameter (in): 7.88	Boring Depth (ft bgs): 50	Coord. System: NAD 83
Sampling Method: Grab		Latitude: 32.583788
Blow Count Method: NA		Longitude: 103.317594
Field Screening Parameter: Volatile organic compounds / Chlorine		Elevation Datum: NAD 88
Meter: MiniRAE Lite / Chlorine QuanTab Test Strips	Units: ppm / mg/L	Ground Elevation (ft): 3562.91
Well Depth (ft bgs): 50.03	Well Depth (ft toc): 49.93	Well Elevation (ft): 3562.81
Casing Length (ft): 29.93	Screen Length (ft): 20.0	Well Measuring Point: Top of casing
Surface Completion: Flush mount concrete pad		Depth to Water (ft toc): 37.58
Well Development: Purged 30 gallons		Date/Time: 11/07/2020 09:00

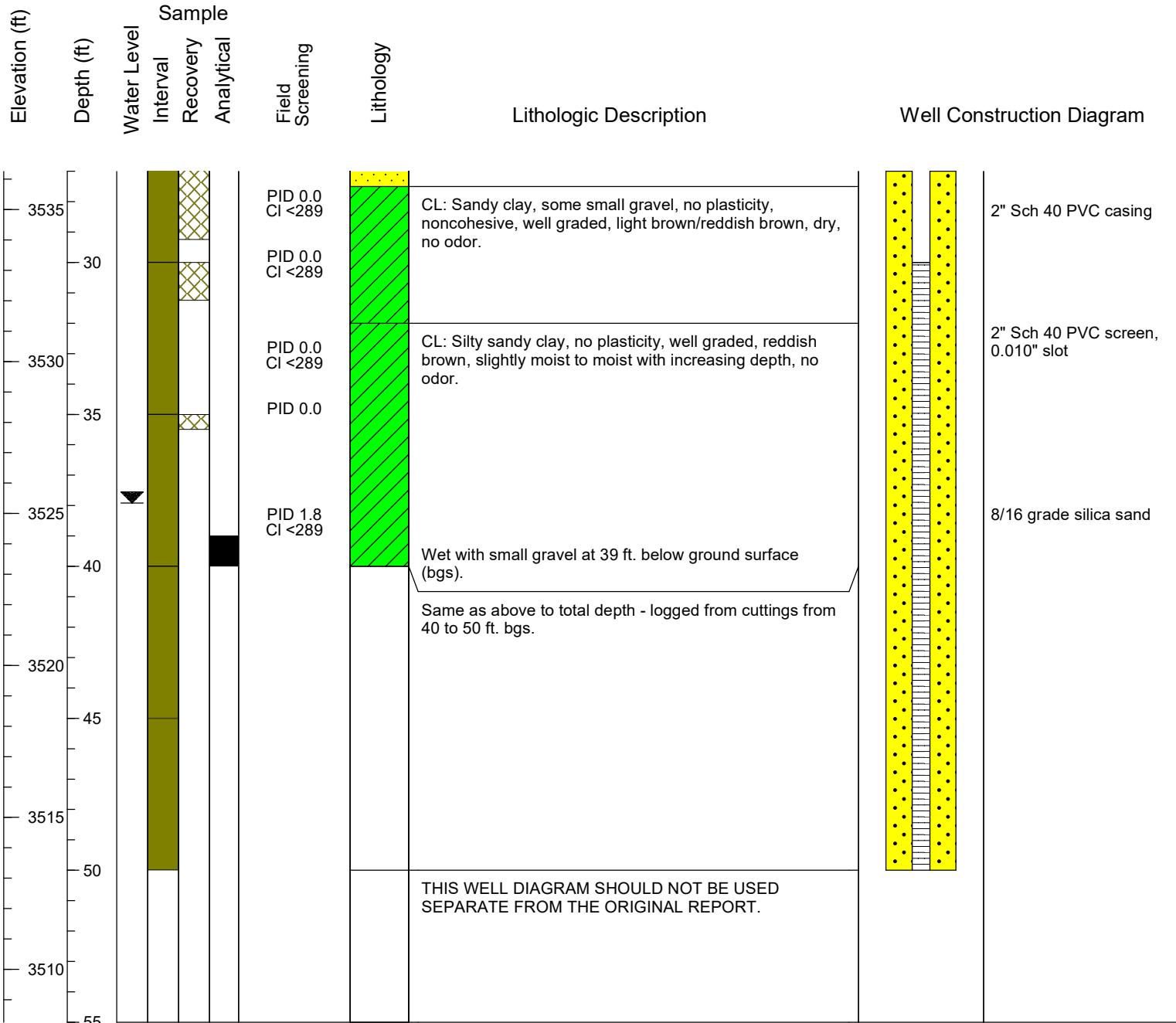





**BORING LOG and  
WELL CONSTRUCTION**
**MW-04 (SB-08)**

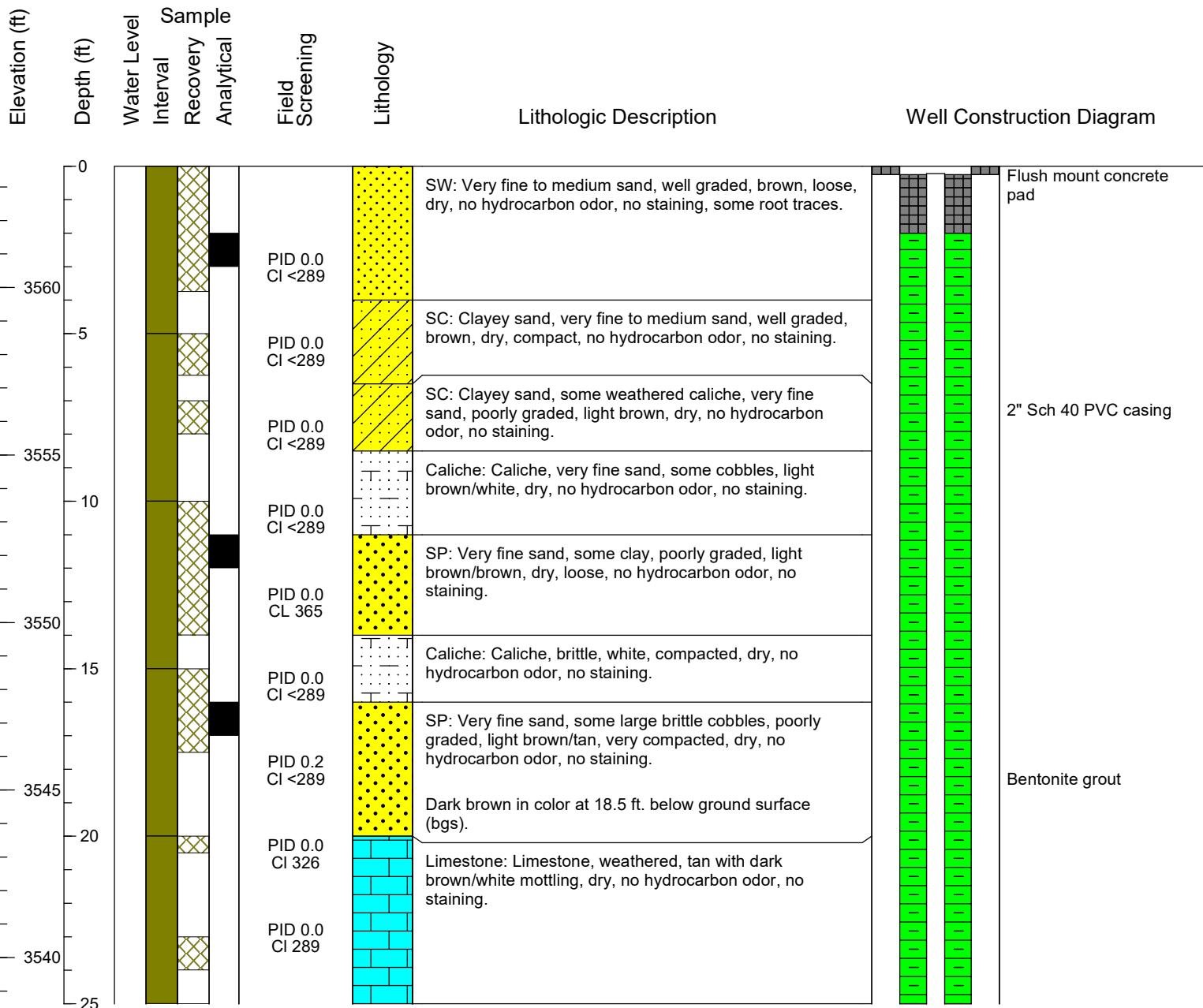
Client: Holly Energy Partners		TRC Project #: 374611
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 11/05/2020
Address: Klein Ranch, Monument, NM		Finish Date: 11/05/2020
Project: Monitoring Well Installation		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: Ronnie Rodriquez & crew	TRC Site Rep.: C. Gaston
Drilling Method: Hollow Stem Auger		TRC Reviewer: R. Varnell
Boring Diameter (in): 7.88	Boring Depth (ft bgs): 50	Coord. System: NAD 83
Sampling Method: Grab		Latitude: 32.583756
Blow Count Method: NA		Longitude: -103.317355
Field Screening Parameter: Volatile organic compounds / Chlorine		Elevation Datum: NAD 88
Meter: MiniRAE Lite / Chlorine QuanTab Test Strips	Units: ppm / ppm	Ground Elevation (ft): 3563.26
Well Depth (ft bgs): 50.45	Well Depth (ft toc): 50.31	Well Elevation (ft): 3563.12
Casing Length (ft): 30.31	Screen Length (ft): 20.0	Well Measuring Point: Top of casing
Surface Completion: Flush mount concrete pad		Depth to Water (ft toc): 37.92
Well Development: Purged 100 gallons		Date/Time: 11/07/2020 11:45

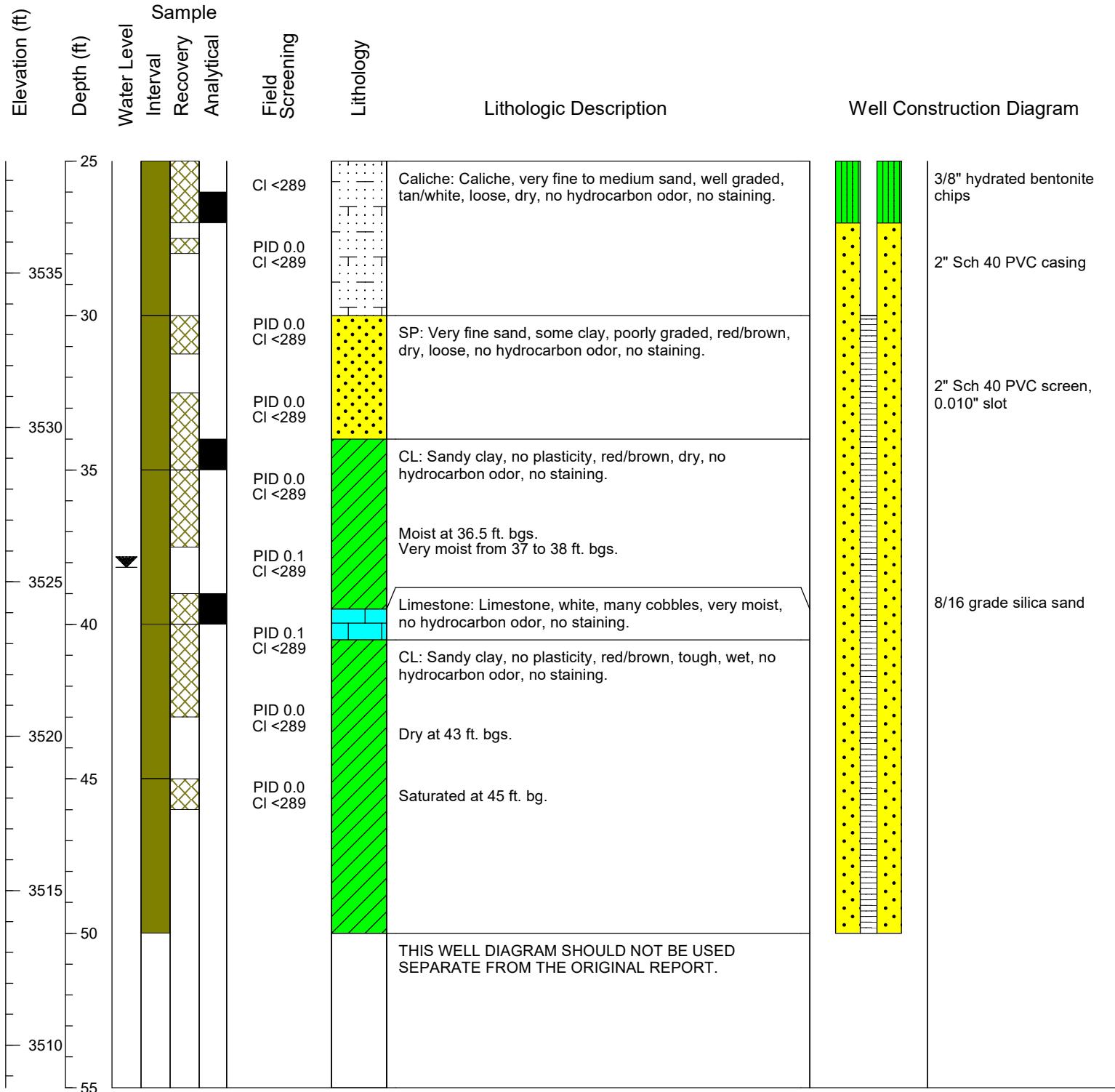





**BORING LOG and  
WELL CONSTRUCTION**
**MW-05 (SB-25)**

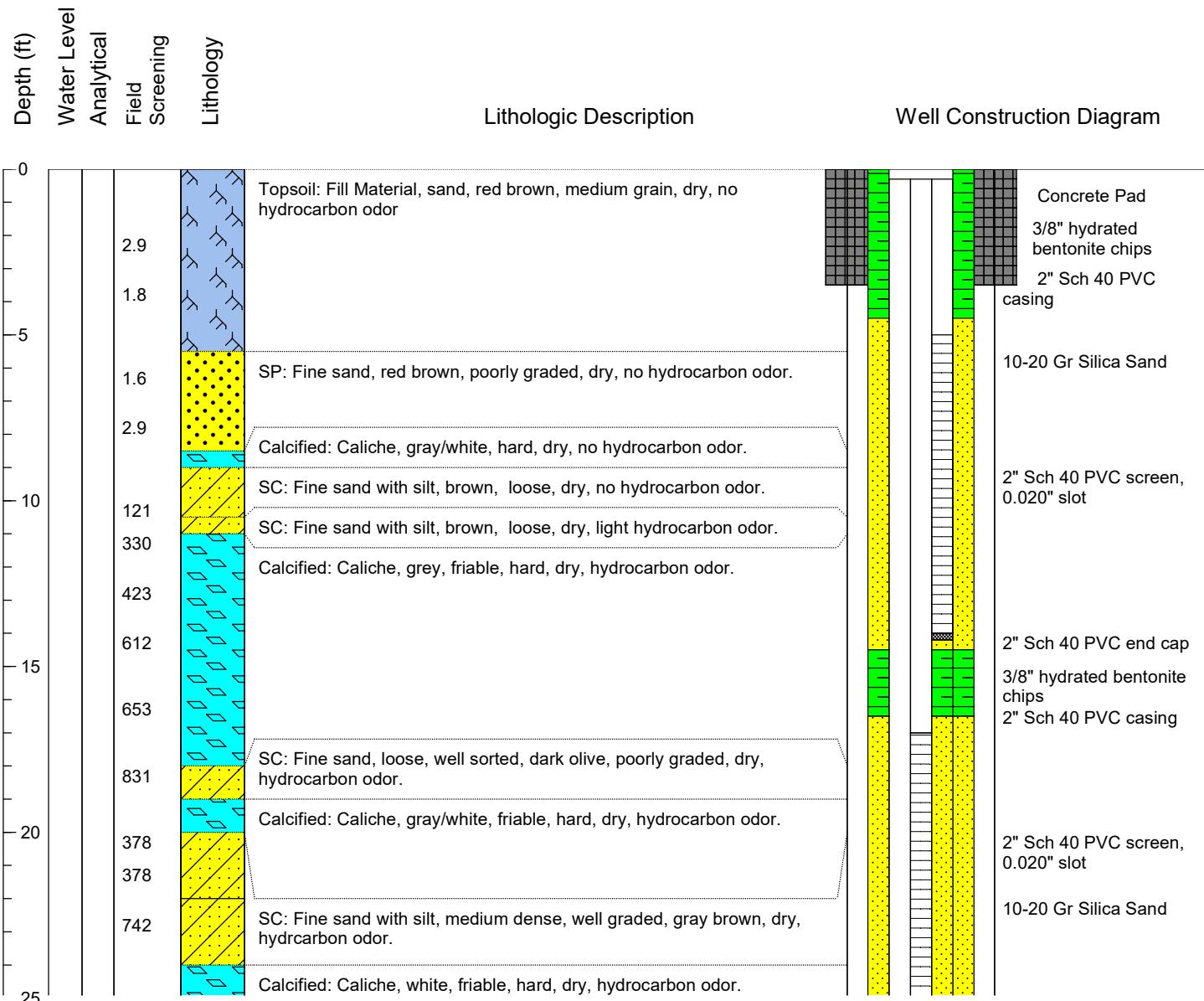
Client: Holly Energy Partners		TRC Project #: 426140
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 5/26/2021
Address: Klein Ranch, Monument, NM		Finish Date: 5/28/2021
Project: Site Assessment		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: Ronnie Rodriguez & crew	TRC Site Rep.: C. Gaston
Drilling Method: Hollow-Stem Auger		TRC Reviewer: R. Varnell
Boring Diameter (in): 7.875	Boring Depth (ft bgs): 50.0	Coord. System: NAD 83
Sampling Method: Continuous 5-ft Core Sampler		Latitude: 32.584131
Blow Count Method: NA		Longitude: -103.317565
Field Screening Parameter: Volatile Organic Compounds / Chlorine		Elevation Datum: NAVD 88
Meter: MiniRAE Lite / Chlorine QuanTab Test Strips		Ground Elevation (ft): 3536.62
Well Depth (ft bgs): 50.0	Well Depth (ft toc): 49.72	Well Elevation (ft): 3563.40
Casing Length (ft): 30.0	Screen Length (ft): 20.0	Well Measuring Point: Top of casing
Surface Completion: Flush mount concrete pad		Depth to Water (ft toc): 38.15
Well Development: Purged 7 liters		Date/Time: 5/28/2021 17:15

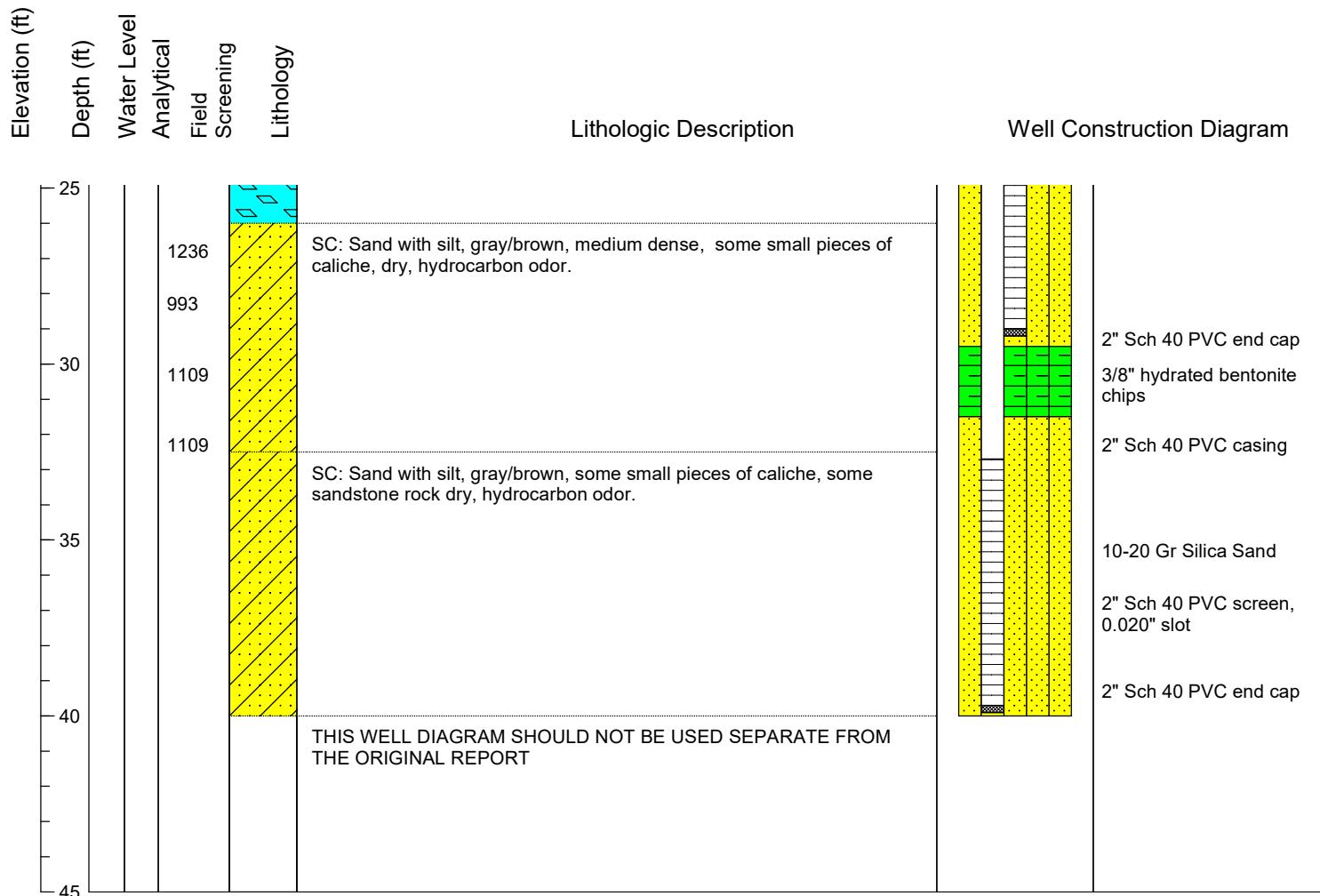





**BORING LOG and  
WELL CONSTRUCTION**
**BV-1**

Client: Holly Energy Partners		TRC Project #: 525769
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 05/05/2023
Address: Klein Ranch, Monument, NM		Finish Date: 05/05/2023
Project: Bioventing Well Install		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: J. Miles, C. Rudy	TRC Site Rep.: J. O'Neal
Drilling Method: Hollow Stem Auger		TRC Reviewer: J. Ward
Boring Diameter (in): 10	Boring Depth (ft bgs): 40	X-Y Coord. System: DMS
Sampling Method: Continuous		Latitude: 32°35'2.15"N
Blow Count Method: N/A		Longitude: 103°19'3.04"W
Field Screening Parameter: Volatile Organic Compounds		Elevation Datum: Not Surveyed
Meter: MiniRAE 5000	Units: ppm	Ground Elevation (ft): Not Surveyed
Well Depth (ft bgs): BV-1S: 14.50; BV-1M: 29.20; BV-1D: 39.90		Well Elevation (ft): Not Surveyed
Estimated Casing Length (ft): BV-1S: 5.00; BV-1M: 16.70; BV-1D: 32.40		Well Measuring Point: NA
Screen Length (ft): BV-1S: 9; BV-1M: 12; BV-1D: 7		Depth to Water (ft toc): NA
Surface Completion: Flush Mount 20" Round Concrete Pad / 10" Steel Cover		
Well Development: NA		



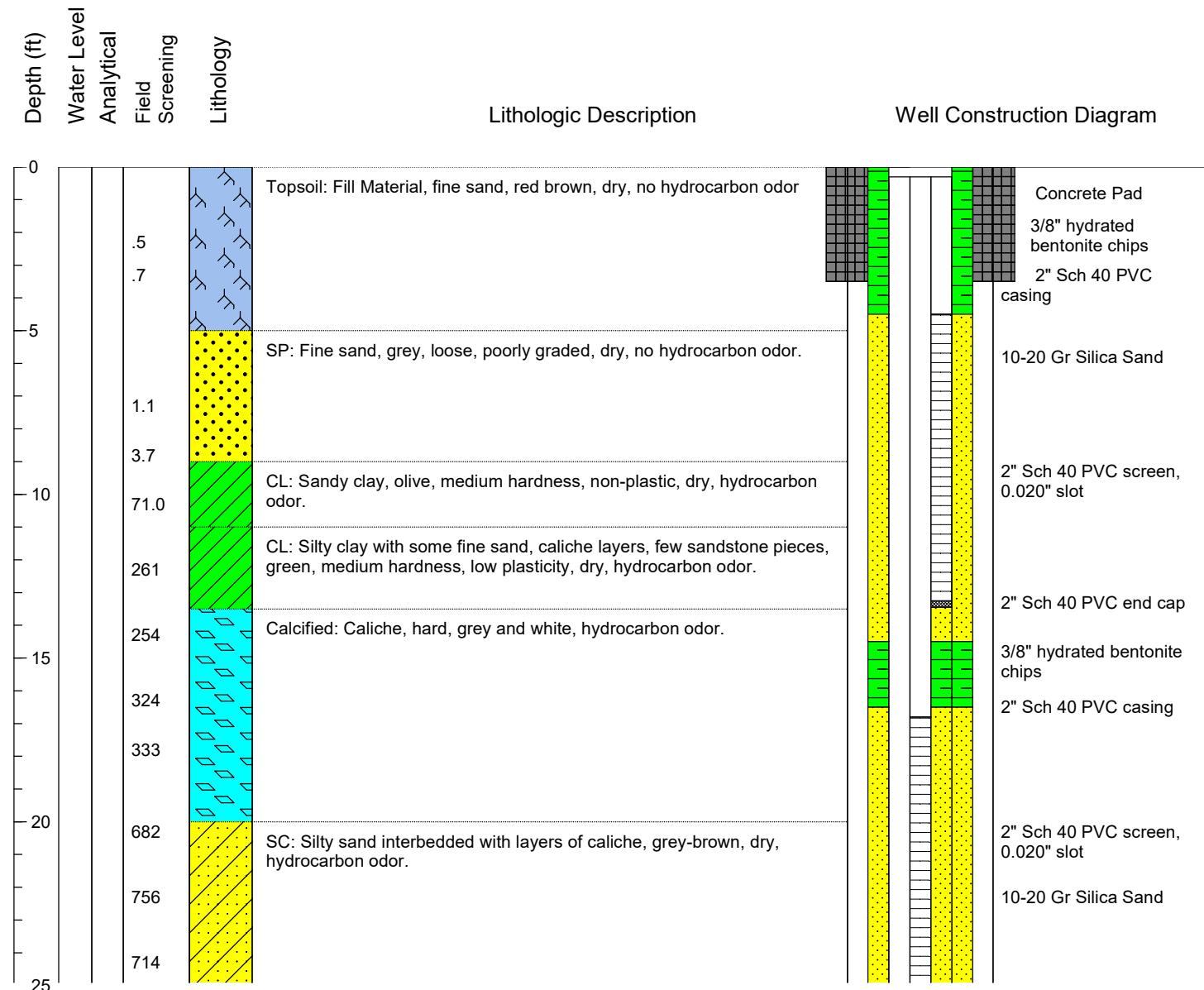


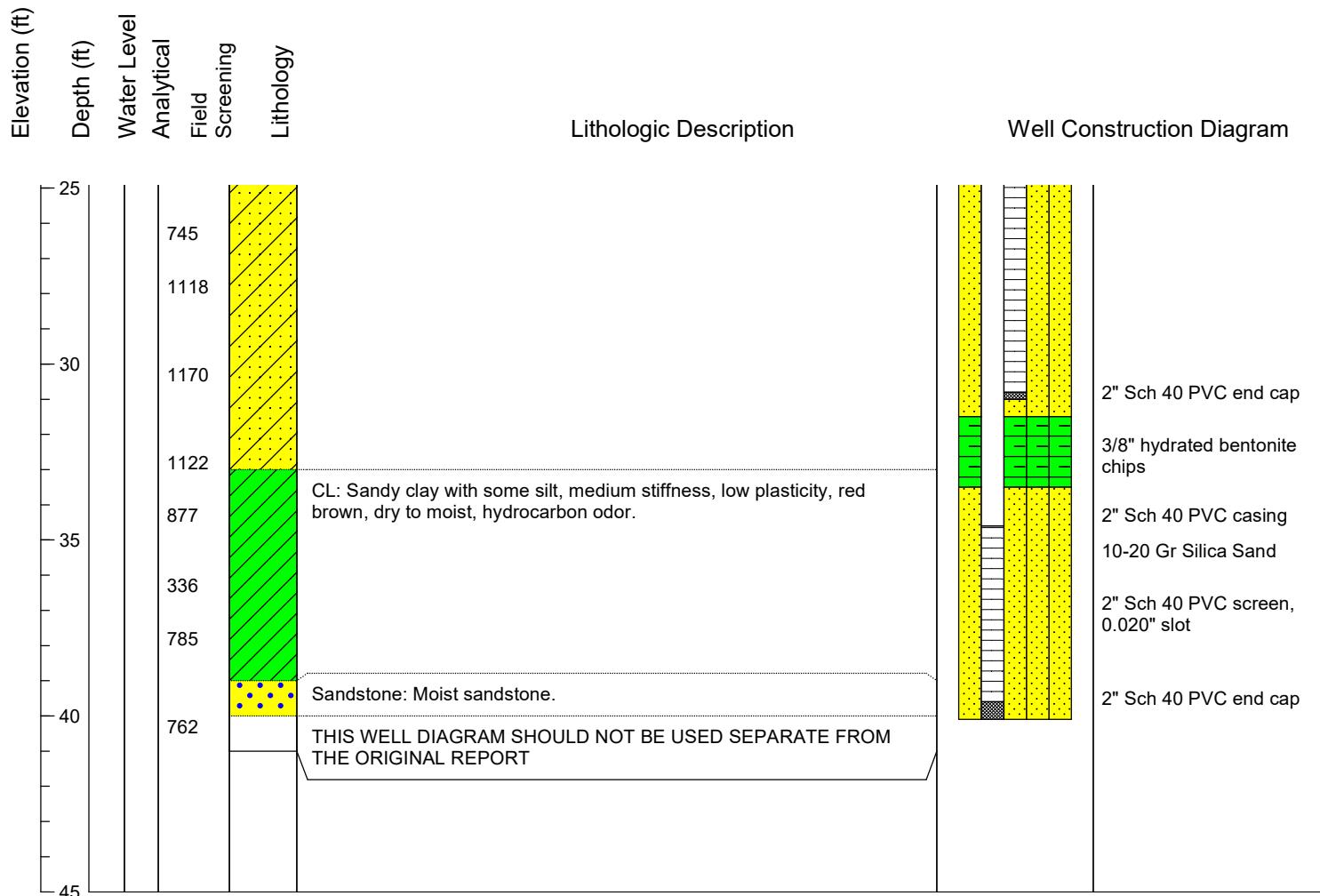


## ▪ **BORING LOG and WELL CONSTRUCTION**

**BV-2**

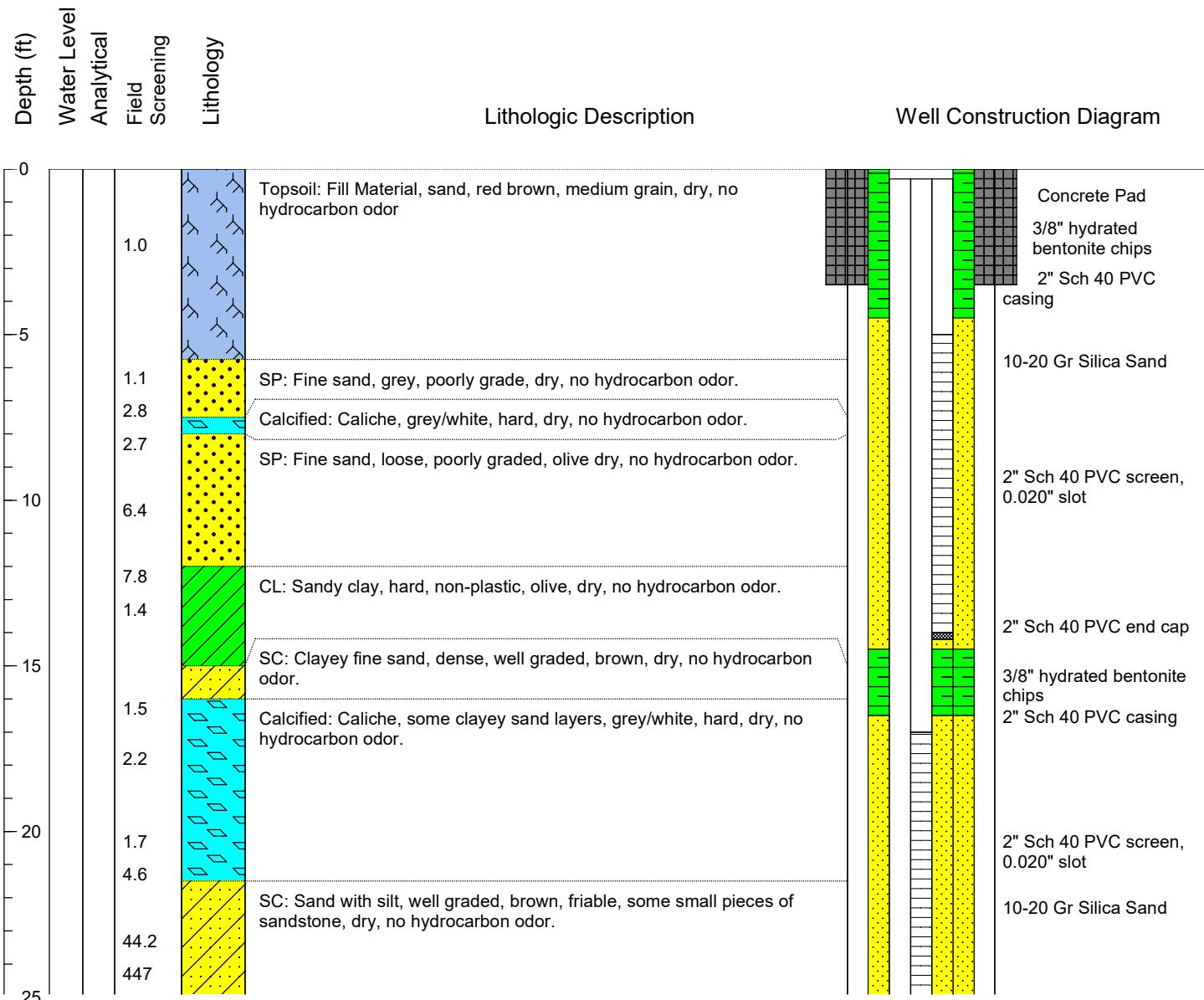
Client: Holly Energy Partners		TRC Project #: 525769
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 05/03/2023
Address: Klein Ranch, Monument, NM		Finish Date: 05/03/2023
Project: Bioventing Well Install		Permit #: NA
Drilling Company:Talon LPE	Drilling Crew:J. Miles, C. Rudy	TRC Site Rep.:J. O'Neal
Drilling Method: Hollow Stem Auger		TRC Reviewer: J. Ward
Boring Diameter (in): 10	Boring Depth (ft bgs):40	X-Y Coord. System:DMS
Sampling Method: Continuous		Latitude: 32°35'2.17"N
Blow Count Method: N/A		Longitude:103°19'2.81"W
Field Screening Parameter: Volatile Organic Compounds		Elevation Datum: Not Surveyed
Meter: MiniRAE 5000	Units: ppm	Ground Elevation (ft): Not Surveyed
Well Depth (ft bgs): BV-2S: 13.25; BV-2M: 31.00; BV-2D: 40.10		Well Elevation (ft): Not Surveyed
Estimated Casing Length (ft): BV-2S: 3.75; BV-2M: 16.50; BV-2D: 34.30		Well Measuring Point: NA
Screen Length (ft): BV-2S: 9; BV-2M: 14; BV-2D: 5		Depth to Water (ft toc): NA
Surface Completion:Flush Mount 20" Round Concrete Pad / 10" Steel Cover		Date/Time: NA
Well Development: NA		

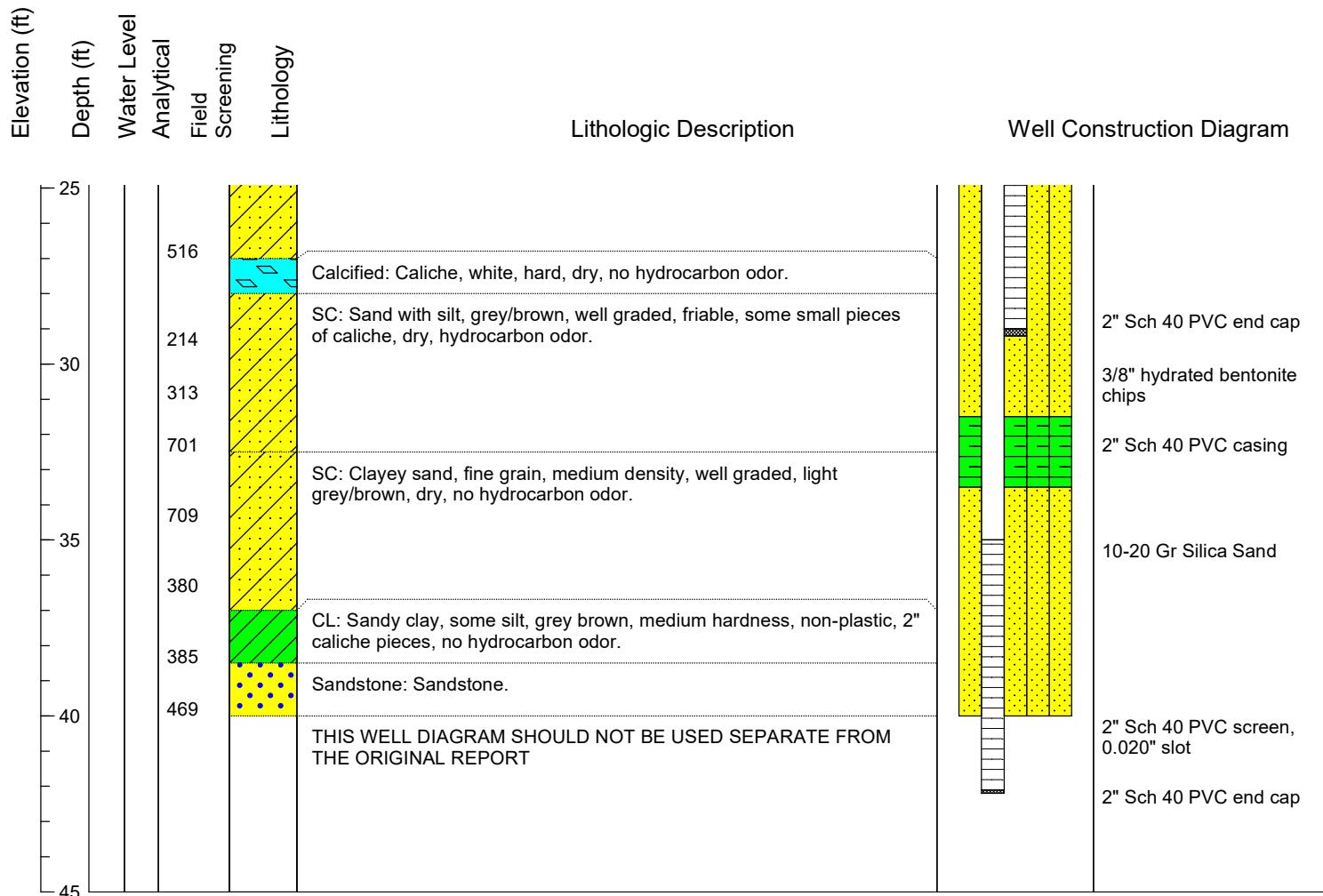





**BORING LOG and  
WELL CONSTRUCTION**
**BV-3**

Client: Holly Energy Partners		TRC Project #: 525769
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 05/04/2023
Address: Klein Ranch, Monument, NM		Finish Date: 05/05/2023
Project: Bioventing Well Install		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: J. Miles, C. Rudy	TRC Site Rep.: J. O'Neal
Drilling Method: Hollow Stem Auger		TRC Reviewer: J. Ward
Boring Diameter (in): 10	Boring Depth (ft bgs): 40	X-Y Coord. System: DMS
Sampling Method: Continuous		Latitude: 32°35'1.99"N
Blow Count Method: N/A		Longitude: 103°19'2.98"W
Field Screening Parameter: Volatile Organic Compounds		Elevation Datum: Not Surveyed
Meter: MiniRAE 5000	Units: ppm	Ground Elevation (ft): Not Surveyed
Well Depth (ft bgs): BV-3S: 14.20; BV-3M: 29.20; BV-3D: 42.30		Well Elevation (ft): Not Surveyed
Estimated Casing Length (ft): BV-3S: 4.70; BV-3M: 16.70; BV-3D: 34.80		Well Measuring Point: NA
Screen Length (ft): BV-3S: 9; BV-3M: 12; BV-3D: 7		Depth to Water (ft toc): NA
Surface Completion: Flush Mount 20" Round Concrete Pad/ 10" Steel Cover		
Well Development: NA		

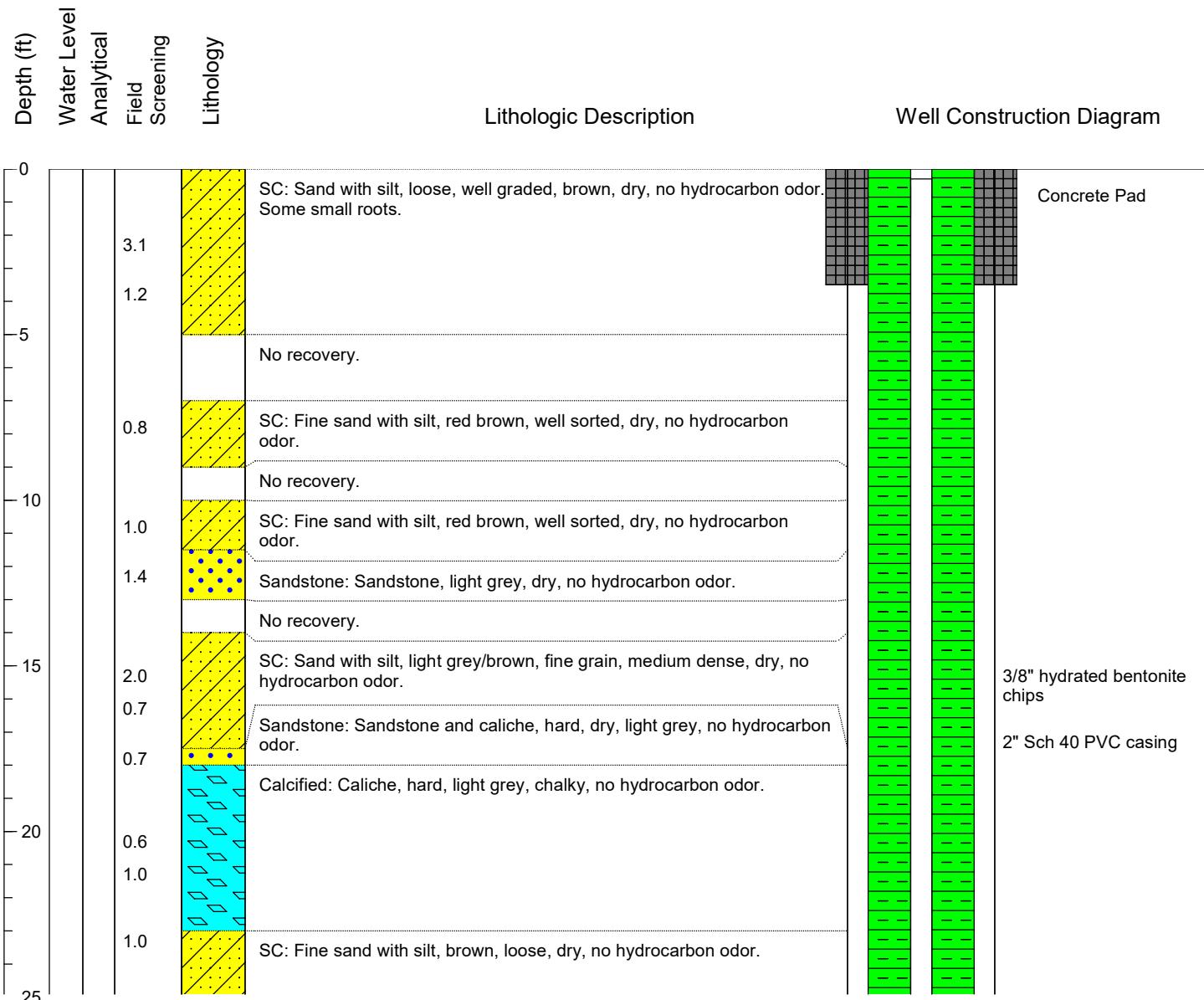


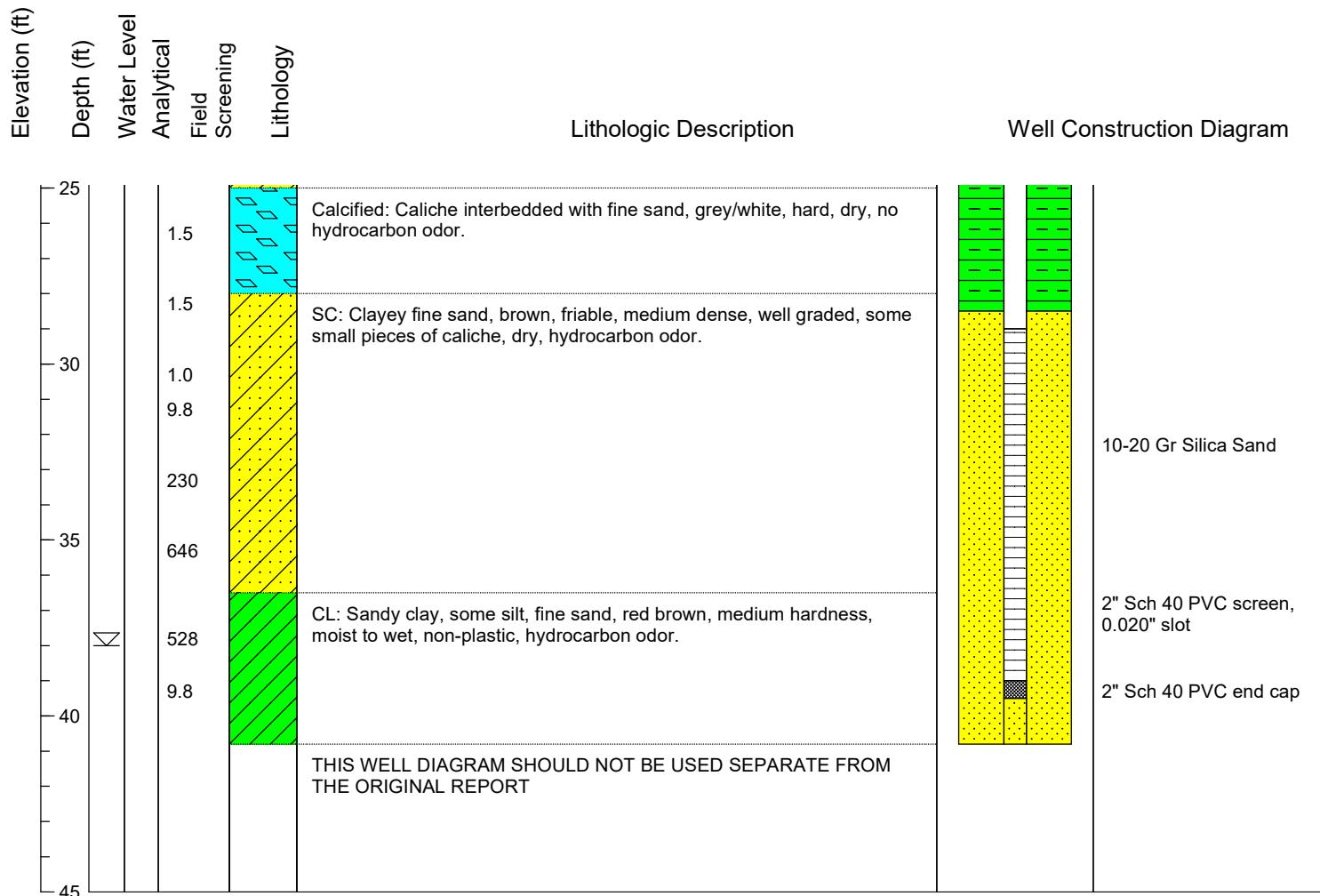




BV-4

Client: Holly Energy Partners		TRC Project #: 525769
Site: WTX to EMSU Battery to Byrd Pump Segment Crude Oil Release		Start Date: 05/03/2023
Address: Klein Ranch, Monument, NM		Finish Date: 05/03/2023
Project: Bioventing Well Install		Permit #: NA
Drilling Company: Talon LPE	Drilling Crew: J. Miles, C. Rudy	TRC Site Rep.: J. O'Neal
Drilling Method: Hollow Stem Auger		TRC Reviewer: J. Ward
Boring Diameter (in): 10	Boring Depth (ft bgs): 40.8	X-Y Coord. System: DMS
Sampling Method: Continuous		Latitude: 32°35'2.06"N
Blow Count Method: N/A		Longitude: 103°19'2.03"W
Field Screening Parameter: Volatile Organic Compounds		Elevation Datum: Not Surveyed
Meter: MiniRAE 5000	Units: ppm	Ground Elevation (ft): Not Surveyed
Well Depth (ft bgs): 39.50		Well Elevation (ft): Not Surveyed
Estimated Casing Length (ft): 28.70		Well Measuring Point: NA
Screen Length (ft): 10		Depth to Water (ft toc): 38.00
Surface Completion: Flush Mount 20" Round Concrete Pad / 10" Steel Cover		Date/Time: 05/03/23
Well Development: NA		





## NOTICE OF STAGE 1 ABATEMENT PLAN INVESTIGATION REPORT

NMOCD Incident No. NOY1822242858

On May 1, 2025, Holly Energy Partners-Operating, L.P. (HEP)(Responsible Party), located at 1602 W. Main, Artesia, New Mexico 88210, submitted a Stage 1 Abatement Plan Investigation Report to the New Mexico Oil Conservation Division (NMOCD) for the WTX to EMSU Battery to Byrd Pump Segment Gathering Line (Site) located in Lea County, New Mexico. The Site is located on private property owned by L&K Ranch, LLC near County Road 46 in Lea County, New Mexico, within Unit P, Section 11, Township 20 South, Range 36 East with coordinates at 32.583874, -103.317460. As specified in 19.15.30.15(A) of the New Mexico Administrative Code (NMAC), HEP is providing this notice to all persons on the Site's mailing lists.

The release occurred on July 11, 2018, and was originally detected during an air patrol fly-over. The release was determined to have originated from a pinhole leak in the bottom of the 6-inch crude oil pipe. HEP personnel immediately shut down the pipe segment and the initial release volume was estimated at less than 1 barrel, therefore under reportable limits. After further investigation, the volume of the spill was reported as greater than 5 barrels, of which 0.5 barrel (or 21 gallons) was recovered with a vacuum truck.

The Stage 1 Abatement Plan was determined to be administratively complete by the OCD on July 1, 2025. The determination is based on the plan meeting all the required components of 19.15.30.13(C) NMAC.

Comments, questions, and requests for a copy of the Stage 1 Abatement Plan Investigation Report (either a paper copy or an electronic copy via the internet) should be sent to the following OCD contact:

Ashley Maxwell  
Oil Conservation Division  
New Mexico Energy, Minerals & Natural Resources Department  
5200 Oakland Avenue, Suite 100  
Albuquerque, NM 87113  
(505) 670-5600  
[Ashley.Maxwell@emnrd.nm.gov](mailto:Ashley.Maxwell@emnrd.nm.gov)

The NMOCD will accept written comments regarding this application for 30 days from the date of notice.

Holly Energy Partners-Operating, L.P.  
Stage 1 Abatement Plan Investigation Report – Initial Notice  
July 2025

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**P.O. Box 1503**  
City, State, Zip  
**Hobbs, NM 88241**

PS Form 3800, April 2015 PSN 7590-02-000-9047

See Reverse for Instructions

# Affidavit of Publication

STATE OF NEW MEXICO  
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated

July 04, 2025

and ending with the issue dated

July 04, 2025.



Publisher

Sworn and subscribed to before me this  
4th day of July 2025.



Business Manager

My commission expires



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said publication has been made.

LEGAL	LEGAL
LEGAL NOTICE July 4, 2025	
NOTICE OF STAGE 1 ABATEMENT PLAN INVESTIGATION REPORT	
NMOCD Incident No. NOY1822242858	
On May 1, 2025, Holly Energy Partners-Operating, L.P. (HEP)(Responsible Party), located at 1602 W. Main, Artesia, New Mexico 88210, submitted a Stage 1 Abatement Plan Investigation Report to the New Mexico Oil Conservation Division (NMOCD) for the WTX to EMSU Battery to Byrd Pump Segment Gathering Line (Site) located in Lea County, New Mexico. The Site is located on private property owned by L&K Ranch, LLC near County Road 46 in Lea County, New Mexico, within Unit P, Section 11, Township 20 South, Range 36 East with coordinates at 32.583874, -103.317460. As specified in 19.15.30.15(B) of the New Mexico Administrative Code (NMAC), HEP is providing this notice in a newspaper to inform the general public of the Stage 1 Abatement Plan Investigation Report.	
The release at the Site occurred on July 11, 2018, and was originally detected during an air patrol fly-over. The release was determined to have originated from a pinhole leak in the bottom of the 6-inch crude oil pipe. HEP personnel immediately shut down the pipe segment and the initial release volume was estimated at less than 1 barrel, therefore under reportable limits. After further investigation, the volume of the spill was reported as greater than 5 barrels, of which 0.5 barrel (or 21 gallons) was recovered with a vacuum truck.	
The Stage 1 Abatement Plan was determined to be administratively complete by the OCD on July 1, 2025. The determination is based on the plan meeting all the required components of 19.15.30.13(C) NMAC.	
Comments, questions, and requests for a copy of the Stage 1 Abatement Plan Investigation Report (either a paper copy or an electronic copy via the internet) should be sent to the following OCD contact:	
Ashley Maxwell Oil Conservation Division New Mexico Energy, Minerals & Natural Resources Department 5200 Oakland Avenue, Suite 100 Albuquerque, NM 87113 (505) 670-5600 <a href="mailto:Ashley.Maxwell@emrnr.nm.gov">Ashley.Maxwell@emrnr.nm.gov</a>	
The NMOCD will accept written comments regarding this application for 30 days from the date of notice. #00302378	

67118605

00302378

MALLORY MILLER  
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# Novak Djokovic sets another record at Wimbledon

LONDON (AP) — Novak Djokovic added another record to his name by reaching Wimbledon's third round for a 19th time with a 6-3, 6-2, 6-0 win over Dan Evans on Centre Court on Wednesday.

It was Djokovic's 99th match win at Wimbledon overall, and the 19 third-round appearances put him one ahead of Roger Federer for most by any man in the Open Era.

It's hardly the most prestigious record for Djokovic, whose 24 Grand Slam titles — including seven at Wimbledon — are the most by a male player. But he could at least use it to poke fun at his new, and much younger, main rivals.

"Nineteen times, that's a great stat," said the 38-year-old Djokovic. "That's probably almost as much as Sinner and Alcaraz have years in their lives."

Well, not quite.

Carlos Alcaraz, who beat Djokovic in the last two Wimbledon finals, is 22, while No. 1-ranked Jannik Sinner — who was playing later on Centre Court — is 23.

The growing rivalry between Sinner and Alcaraz — especially in the wake of their five-set final at the French Open last month — has helped tennis move on from the era of the Big Three, where Djokovic is the last man standing after Federer and Rafael Nadal retired.

But Djokovic is too focused on proving he can still win another Slam to sit back and reflect on everything he has accomplished at Wimbledon.

"I don't pause to reflect, to be honest. I don't have time," Djokovic said in an on-court interview. "I would like to. But I think that's going to come probably when I set the racket aside and then sip margarita on the beach with Federer and Nadal and just reflect on our rivalry and everything."

Later in his news conference, Djokovic said he might

choose a different drink if the three former rivals do get together.

"I don't know why I said margaritas because I never had a margarita in my life," he said. "I don't necessarily like that drink, but I guess it sounds good."

Against Evans, Djokovic failed to convert his first nine break points in the first set. But once he got the breakthrough for a 5-3 lead — raising both arms in the air as if to say "finally" — he went five-for-six on break points the rest of the way.

"You have these kinds of days where everything goes your way," said Djokovic, who didn't face a break point of his own until the final game. "Everything flows."

What else happened Thursday at Wimbledon?

The top women's players all avoided further upsets, after four of the five highest seeds went out over the first three days. No. 7-seeded Mirra Andreeva and No. 10 Emma Navarro both advanced in straight sets. The 18-year-old Andreeva earned a 6-1, 7-6 (4) win over Lucia Bronzetti of Italy, and Navarro cruised past Veronika Kudermetova 6-1, 6-2.

Former No. 1 Iga Swiatek, seeded eighth as she bids for a first Wimbledon title, had to come from a set down to beat Caty McNally 5-7, 6-2, 6-1 on Centre Court. Defending champion Barbora Krejcikova was also taken to a third set before beating Caroline Dolehide 6-4, 3-6, 6-2, while 2022 Wimbledon winner Elena Rybakina beat Maria Sakkari 6-3, 6-1.

In the men's draw, it was a good day for the old guys. Aside from Djokovic, 34-year-old Grigor Dimitrov, 35-year-old Jan-Lennard Struff and 36-year-old

Marin Cilic all advanced.

Cilic, the 2014 U.S. Open champion and 2017 Wimbledon runner-up, stunned British No. 4-seed Jack Draper 6-4, 6-3, 1-6, 6-4 on No. 1 Court.

No. 11 Alex de Minaur ousted 115th-ranked Arthur Cazaub 4-6, 6-2, 6-4, 6-0 and 19th-seeded Grigor Dimitrov outlasted Corentin Moutet 7-5, 4-6, 7-5, 7-5.

## JUMBLE

Unscramble these Jumbles, one letter to each square, to form four ordinary words.

RIWLT



WSEOH



RSDHUO



LYAASR



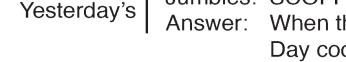
THAT SCRAMBLED WORD GAME  
By David L. Hoyt and Jeff Knurek

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HIS CLAIM THAT HE COULD EAT ONE OF THE HOT DOGS IN JUST TWO BITES WAS ---

Now arrange the circled letters to form the surprise answer, as suggested by the above cartoon.



(Answers Monday)

Yesterday's Jumbles: SCOFF HOVER OUTLAW MURMUR  
Answer: When they needed help with their Independence Day cookout, their friends — CAME "FOURTH"

## LEGAL

## LEGAL

## LEGAL

LEGAL NOTICE  
June 27, July 4, 11 and 18, 2025

STATE OF NEW MEXICO  
COUNTY OF LEA  
FIFTH JUDICIAL DISTRICT COURT

CHARNI L. HINKLE, formerly known as  
CHARNI L. DURHAM, AND DARYNE J. DECK  
Plaintiffs,

vs. D-506-CV-2025-00511

THE UNKNOWN HEIRS OF RITA JOHNSON,  
DECEASED,

AND

ALL UNKNOWN CLAIMANTS OF INTEREST  
IN THE PREMISES ADVERSE TO PLAINTIFFS,  
Defendants.

## SUMMONS AND NOTICE OF SUIT PENDING

TO: DEFENDANTS THE UNKNOWN HEIRS OF RITA JOHNSON,  
DECEASED, AND ALL UNKNOWN CLAIMANTS OF INTEREST IN THE  
PREMISES ADVERSE TO PLAINTIFFS

## GREETINGS:

You and each of you are notified that there has been filed in the District Court of Lea County, New Mexico, the above entitled cause of action wherein Charni L. Hinkle, formerly known as Charni L. Durham, and Daryne J. Deck are Plaintiffs and you are Defendants. The objects and purposes of said suit are to quiet title to Plaintiffs' overriding royalty interests in and to all of the oil, gas and minerals in and under and that may be produced from the following described lands situate in Lea County, New Mexico:

Township 21 South, Range 32 East, N.M.P.M.

Section 19: Lots 1, 2 E 1/2 NW 1/4 (NW 1/4)

containing 166.55 acres, more or less, for all depths (herein called "Said Lands").

Said Lands are embraced in United States Oil and Gas Lease NMNM 14331, issued on April 1, 1973, to Frank Eble, as original lessee. Said lease as to Said Lands is sometimes herein called "Subject Lease". The Subject Lease is located approximately 28 miles West and North of Eunice, New Mexico. Said Lands have no street address.

You, and each of you, are further notified that unless you enter your appearance within thirty (30) days after the date of last publication hereof pursuant to NMRA 1-004(B)(2) and file a responsive pleading or motion within such time, judgment by default may be rendered in said cause against each of you so failing to appear and the Plaintiffs will apply to the Court for the relief demanded in this Complaint to Quiet Title.

The name of Plaintiffs' attorneys is Hinkle Shanor LLP (Douglas L. Lunsford), whose address is P. O. Box 10, Roswell, New Mexico 88202, and whose phone number is (575) 622-6510.

WITNESS my hand and Seal of the Court this 10th day of June, 2025

NELDA CUELLAR  
CLERK OF THE DISTRICT COURT  
By: /s/ Cory Hagedorn  
Deputy Clerk

(SEAL)

#00302083

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 498177

**CONDITIONS**

Operator:  HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID:  282505
	Action Number:  498177
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

**CONDITIONS**

Created By	Condition	Condition Date
amaxwell	Stage I Abatement plan approved with the conditions listed below:	12/8/2025
amaxwell	All groundwater samples will be analyzed according to all constituents in 20.6.2.3103 NMAC Pursuant to 19.15.30.9.B(2) NMAC. Operators may request to reduce sampling constituents based upon future results.	12/8/2025
amaxwell	Approved Stage 1 Abatement Activities will be conducted and submitted as a report by February 6, 2026. In the event that the release site was not fully delineated, the report must also include the location of proposed additional delineation monitor wells and a schedule for additional delineation.	12/8/2025