

BW - 25

C-141

**FEE SUBMITTAL
PROCESS**

2019

Chavez, Carl J, EMNRD

From: Ramon Medina <rmedina@talonlpe.com>
Sent: Monday, November 25, 2019 11:27 AM
To: Chavez, Carl J, EMNRD
Cc: Griswold, Jim, EMNRD; Rickman, Leslie, EMNRD; Rose-Coss, Dylan H, EMNRD; Pritchett, Gary
Subject: [EXT] RE: BW-25 Basic Salado Brine SWD Analytical and Sample Map

Thank you for the update.

Ramon Medina

Project Manager

Office: 432.522.2133

Cell: 469.858.3988

Fax: 432.522.2180

Emergency: 866.742.0742

Web: www.talonlpe.com



From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Sent: Monday, November 25, 2019 12:26 PM
To: Ramon Medina <rmedina@talonlpe.com>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; Pritchett, Gary <Gary.Pritchett@basicenergyservices.com>
Subject: RE: BW-25 Basic Salado Brine SWD Analytical and Sample Map

CAUTION EXTERNAL EMAIL

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Ramon, et al.:

Good morning! Yes. The C-141 Form has been uploaded (10/30 with the online fee system) to the Hobbs District Office for review.

By copy of this e-mail msg. to Jim Griswold, he will ensure the C-141 is reviewed.

Thank you for the communication.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Ramon Medina <rmedina@talonlpe.com>

Sent: Monday, November 25, 2019 10:41 AM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; Pritchett, Gary <Gary.Pritchett@basicenergyservices.com>

Subject: [EXT] RE: BW-25 Basic Salado Brine SWD Analytical and Sample Map

Gentlemen,

A C-141 was filed on October 30. Are we to be waiting on a response on that?

Ramon Medina

Project Manager

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From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Sent: Thursday, August 15, 2019 5:36 PM

To: Ramon Medina <rmedina@talonlpe.com>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: RE: BW-25 Basic Salado Brine SWD Analytical and Sample Map

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Ramon, Part 29 Regulations (see below) require the upper 4 ft. to be less than 600 ppm Cl for the reclamation portion. The depth of GW is also at issue as OCD's review of GW from the OSE DB indicates SWL depths of < 50 ft.

19.15.29.13 RESTORATION, RECLAMATION AND RE-VEGETATION:

A. The responsible party must substantially restore the impacted surface areas to the condition that existed prior to the release or their final land use. Restoration of the site must include the replacement of removed material and must be replaced to the near original relative positions and contoured to achieve erosion control, longterm stability and preservation of surface water flow patterns.

B. Areas reasonably needed for production operations or for subsequent drilling operations must be compacted, covered, paved or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practical.

C. The responsible party must construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

D. Reclamation of areas no longer in use. The responsible party shall reclaim all areas disturbed by the remediation and closure, except areas reasonably needed for production operations or for subsequent drilling

operations, as early and as nearly as practical to their original condition or their final land use and maintain those areas to control dust and minimize erosion to the extent practical.

(1) The reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.

[[19.15.29.13](#) NMAC - N, 8/14/2018]

From: Ramon Medina <rmedina@talonlpe.com>

Sent: Thursday, August 15, 2019 4:00 PM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: RE: Basic Salado Brine SWD Analytical and Sample Map

Can you please advise which sample would make you believe that there is a release. I was under the impression that we were well below the OCD standard based on depth to groundwater.

Ramon Medina

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From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Sent: Thursday, August 15, 2019 3:52 PM

To: Ramon Medina <rmedina@talonlpe.com>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: FW: Basic Salado Brine SWD Analytical and Sample Map

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Mr. Medina:

The New Mexico Oil Conservation Division (OCD) has completed its review of the attached environmental information.

Based on OCD's review of the environmental data, there appears to be a release(s) at the facility.

The OCD Bureau Chief has directed me to inform you that Basic Energy Services will need to follow [19.15.29 NMAC](#) and the [C-141](#) Fee Submittal Process.

OCD cannot inspect the facility until it has been investigated, remediated and restored to the final condition for OCD Hobbs inspection.

Thank you for contacting the OCD.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Ramon Medina <rmedina@talonlpe.com>
Sent: Thursday, August 15, 2019 1:27 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Subject: RE: Basic Salado Brine SWD Analytical and Sample Map

Before we took over the cleanup of the site, someone excavated underneath one of the concrete pads, down to almost 6 feet. We are not entirely sure why this was done. Also, by removing the remaining concrete pads, we left much ground disturbance. Also, we removed quite a bit of underground lines. This is why we want to involved in the walk through as well, in case we have missed anything.

Ramon Medina
Project Manager
Office: 432.522.2133
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Fax: 432.522.2180
Emergency: 866.742.0742
Web: www.talonlpe.com



From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Sent: Thursday, August 15, 2019 2:17 PM
To: Ramon Medina <rmedina@talonlpe.com>
Subject: RE: Basic Salado Brine SWD Analytical and Sample Map

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Ramon, good afternoon.

Can you explain why backfilling the site is necessary?

Thank you.

From: Ramon Medina <rmedina@talonlpe.com>

Sent: Thursday, August 15, 2019 1:14 PM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Pritchett, Gary <Gary.Pritchett@basicenergyservices.com>

Cc: Silvestre B. Galindo <sgalindo@talonlpe.com>; David McInnis <dmcinnis@talonlpe.com>

Subject: Fwd: Basic Salado Brine SWD Analytical and Sample Map

Good afternoon.

Attached is an analytical table from the results obtained at the Salado SWD site, along with a sample map of the sample locations. Please review and please let us know if these results are acceptable for closure. We are I. The process of generating the closure report, but it will not be complete until after we return to the site for backfill and grading.

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From: David McInnis <dmcinnis@talonlpe.com>

Sent: Thursday, August 15, 2019 2:01:16 PM

To: Ramon Medina <rmedina@talonlpe.com>

Subject: Basic Salado Brine SWD Analytical and Sample Map

Ramon,

Attached are the pdf of the analytical table and sample map.

David McInnis

Environmental Scientist

Office: 432.522.2133

Cell: 409.454.3009

Fax: 432.522.2180

Emergency: 866.742.0742

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Chavez, Carl J, EMNRD

From: Ramon Medina <rmedina@talonlpe.com>
Sent: Friday, October 4, 2019 8:48 AM
To: Chavez, Carl J, EMNRD
Cc: Griswold, Jim, EMNRD; Silvestre B. Galindo; Fortner, Kerry, EMNRD; Billings, Bradford, EMNRD
Subject: [EXT] RE: Basic Salado Brine SWD Analytical and Sample Map (BW-25) Salado No. 2 Brine Well

In reviewing this form, we had no idea there was a release. We provided analytical upon completion of the demolition/debris removal that we were hired to complete. The results caught us off guard because we have no information about a release. With that said, I am assuming that we will leave most of these sections blank?

Ramon Medina

Project Manager

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From: Ramon Medina
Sent: Friday, October 4, 2019 9:46 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Silvestre B. Galindo <sgalindo@talonlpe.com>; Fortner, Kerry, EMNRD <Kerry.Fortner@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Basic Salado Brine SWD Analytical and Sample Map (BW-25) Salado No. 2 Brine Well

My apologies, but the work began before we were aware that the OCD was involved. The original paperwork that we received was from the BLM and the BLM made it clear that there were no environmental concerns. Please forgive the lack of knowledge on these forms. We are based out of Texas and are learning as we go on the New Mexico regs. Any guidance would be appreciated.

Ramon Medina

Project Manager

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From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Sent: Friday, October 4, 2019 9:29 AM

To: Ramon Medina <rmedina@talonlpe.com>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Silvestre B. Galindo <sgalindo@talonlpe.com>; Fortner, Kerry, EMNRD <Kerry.Fortner@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Subject: RE: Basic Salado Brine SWD Analytical and Sample Map (BW-25) Salado No. 2 Brine Well

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Ramon:

Good morning! Basic Energy Services through Talon was directed to submit a [C-141 Form](#) through the new [OCD Fee Portal System](#) to submit and complete the remedial investigation under the C-141 Form and Part 29 (i.e., [19.15.29 NMAC](#)).

Once the C-141 Form is processed by the OCD, a permit number is issued to track the remediation. Part 29 and the Form direct the permittee through the process, but basically, the permittee must complete the investigation and propose a remediation work plan for OCD review and approval. OCD does not review investigation work plans because guidance is included in the C-141 Form and Regulations.

For questions on how to upload and pay for the C-141 submittal, please contact Bradford Billings at (505) 476-3482 or E-mail: Bradford.Billings@state.nm.us.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Ramon Medina <rmedina@talonlpe.com>

Sent: Friday, October 4, 2019 6:44 AM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; Silvestre B. Galindo <sgalindo@talonlpe.com>

Subject: [EXT] RE: Basic Salado Brine SWD Analytical and Sample Map

Gentlemen,

Here is a summary of analytical to date. Areas associated with BH-4 and BH-5 are finally below all of the OCD regulated limits. We are still pending the TPH results for BH-1 and we will be obtaining samples for BH-7 and BH-8 today at a depth of 4'. These are areas that were not associated with the tank battery, but they are areas where we removed some of the concrete slabs. In the meantime, due to the time that we have spent on this project, we are asking if we can proceed

with backfilling areas associated with BH-4 and BH-5, since those areas are now clean according to 19.15.29 NMAC. We did not want to proceed with any backfill activities without consulting the OCD. Please advise.

Ramon Medina

Project Manager

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From: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Sent: Wednesday, September 11, 2019 12:09 PM

To: Ramon Medina <rmedina@talonlpe.com>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: RE: Basic Salado Brine SWD Analytical and Sample Map

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Ramon:

Good morning. Please be sure to follow the 19.15.29 NMAC and OCD C-141 Form.

Please refer to OCD responses to your questions below.

Please contact me if you have questions.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
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From: Ramon Medina <rmedina@talonlpe.com>

Sent: Wednesday, September 11, 2019 6:28 AM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>

Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Rickman, Leslie, EMNRD <Leslie.Rickman@state.nm.us>; Rose-

Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>

Subject: [EXT] RE: Basic Salado Brine SWD Analytical and Sample Map

Good morning all,

We will begin additional remediation at the Salado Brine SWD this morning. I wanted to keep everyone informed.

Carl,
Since we have current analytical readings at different depths, will we be able to use that data for our closure report or do we need to obtain new samples for those locations that are above regulations. *Yes.*

Also, a quick question regarding the 4' mark, if we are still at above 600 mg/Kg at 4', do we need to continue to go deeper? *I presume you're focused on Chlorides. Yes because the horizontal and vertical extent of contamination must be addressed under 19.15.29 NMAC (OCD C-141 Form).*

Ramon Medina

Project Manager

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Sent: Thursday, August 15, 2019 3:52 PM

To: Ramon Medina <rmedina@talonlpe.com>

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Sent: Thursday, August 15, 2019 2:17 PM
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To: Ramon Medina <rmedina@talonlpe.com>
Subject: Basic Salado Brine SWD Analytical and Sample Map

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Attached are the pdf of the analytical table and sample map.

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