

**From:** [Eads, Cristina, EMNRD](#)  
**To:** ["Baker, Larry"; Feather, David](#)  
**Cc:** [Billings, Bradford, EMNRD](#); [tjennings@hungry-horse.com](mailto:tjennings@hungry-horse.com)  
**Subject:** RE: Closure Request - 1RP-3066 SESRQU #428  
**Date:** Friday, January 10, 2020 11:19:00 AM  
**Attachments:** [3. \(C-141 Denied\) SESRQU #428 1RP-3066.pdf](#)

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Bruce,

Thanks for the response, and apologies that my reply has been so delayed.

The OCD has reviewed the closure report and C-141 for SESRQU #428, 1RP-3066. This closure request is denied for the following:

- Based on the ground water information included in the report dated October 24, 2019, it appears that the closure criteria should be for releases where depth to ground water is 50' or less. Therefore, the site has not been completely delineated. As the 2019 sampling data shows elevated amounts of chloride at depths greater than 2' below ground surface, the OCD requests that Apache perform additional sampling. Please, include sample locations on a scaled site map, as it is unclear from where samples were previously collected in 2010 and 2019.
  - o If rock refusal interferes with sample collection/remediation, efforts should be made to remove the rock. If the rock is immovable, Apache should use alternate remediation methods in these areas to achieve the best remediation possible.

Please call or email me if you wish to discuss.

Thanks,

**Cristina Eads**

*Environmental Bureau*  
*EMNRD – Oil Conservation Division*  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505.476.3084  
email: [Cristina.Eads@state.nm.us](mailto:Cristina.Eads@state.nm.us)

**OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.**

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**From:** Baker, Larry <Larry.Baker@apachecorp.com>  
**Sent:** Friday, December 20, 2019 10:34 AM  
**To:** Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Feather, David <David.Feather@apachecorp.com>  
**Cc:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; tjennings@hungry-horse.com  
**Subject:** [EXT] RE: Closure Request - 1RP-3066 SESRQU #428

Ms. Eads,

Due to the age of the release Apache Corporation had only the information on the initial C-141 and were able to obtain a 2010 laboratory report from Cardinal Laboratories. Utilizing the data on the initial C-141 we determined the location of the release utilizing images through time on google maps. Once we determine the location we utilized the sample protocol pre-determined for all pasture releases (See Attachment). This protocol was utilized for all pasture releases unless we had information that warranted a deeper sampling event. The reason a 2' sample was not collected at South SP 1 was because of refusal. The assumption is if refusal is encounter then we are at the bottom of the original excavation or outside the excavation. South SP 1 is either the bottom or outside the excavation and should not warrant further action due to analysis are below table 1 standards. There were some elevated chloride concentrations at West SP 1. Apache Corporation decided in accordance with the rule to ask for a variance to leave in place due to healthy vegetation in that area. An excavation in that area would disturb the vegetation already re-established. Another factor in the decision not to excavate was that the levels were below closure criteria for release 51-100 feet and therefore pose no threat to groundwater. The vegetation will also limit the downward migration of chloride. Please let me know if you have any question to help you make a determination on this release. Thanks and have a good weekend.

**BRUCE BAKER**

ENVIRONMENTAL TECHNICIAN SR

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**From:** Eads, Cristina, EMNRD [<mailto:Cristina.Eads@state.nm.us>]

**Sent:** Thursday, December 19, 2019 12:34 PM

**To:** Feather, David <[David.Feather@apachecorp.com](mailto:David.Feather@apachecorp.com)>; Baker, Larry <[Larry.Baker@apachecorp.com](mailto:Larry.Baker@apachecorp.com)>

**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; [tjennings@hungry-horse.com](mailto:tjennings@hungry-horse.com)

**Subject:** [EXTERNAL] Closure Request - 1RP-3066 SESRQU #428

Mr. Feather,

The OCD has received your closure request for 1RP-3066, SESRQU #428. Before providing a determination on this request, we need the following:

- Details from the 2010 excavation and sampling event. What were the dimensions of the excavation, particularly the depth? Was a liner installed? What fill material was used? From where and what depth were the samples collected?
- Details from the 2019 sampling event and excavation, if excavation occurred. From where

were the samples collected? Was 2010 fill material sampled?

- A sample from 2' bgs at SOUTH SP1
- If excavation has not yet taken place, plan to excavated the top 4' of the WEST SP1 area and install a liner prior to backfilling. Please provide planned excavation dimensions and fill material info.

Please address these points within the next 30 days.

Thank you for your continued efforts at this site. Please let me know if you have any questions or concerns.

Regards,

**Cristina Eads**

*Environmental Bureau*

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