From: Sanjari, Melodie (MRO)

To: <u>Eads, Cristina, EMNRD</u>; <u>ngordon@vertex.ca</u>

Cc: <u>Johnson, Misti M. (MRO)</u>

Subject: [EXT] RE: Trebuchet Fee 23 28 19 WXY #010H

Date: Wednesday, April 29, 2020 8:19:41 AM

Attachments: <u>image001.png</u>

image002.png

Rpt 1909531 Trebuchet Fee 23 28 19 WXY 10H background.pdf
Trebuchet Fee 23 28 19 WXY #010H Closure Report Attach 4 compressed.pdf

Good Morning Ms. Eads,

I apologize for the delayed response – I have addressed your questions below in bold.

Thanks and have a great day

Melodie Sanjari

Environmental Professional Marathon Oil Company – Permian Asset Cell - (575) 988-8753 4111 S. Tidwell Road Carlsbad, NM 88220



From: Eads, Cristina, EMNRD < Cristina. Eads@state.nm.us>

Sent: Friday, April 24, 2020 2:20 PM

To: Sanjari, Melodie (MRO) <msanjari@marathonoil.com>; ngordon@vertex.ca

Cc: Johnson, Misti M. (MRO) <mjohnson4@marathonoil.com> **Subject:** [External] RE: Trebuchet Fee 23 28 19 WXY #010H

Beware of links/attachments.

Good afternoon Melodie,

I started re-reviewing this report, and now that I have the lab data, I have a few more questions/things I need from you.

1. There are two sets of sample data for the first background sample location (BG(-)19-02). From 0 to 4' bgs, the data from 09/10/19 is used. From 6-14' bgs, the data from 10/26/19 is used. Was there a reasoning behind this? Or was this previously approved?

The initial excavation was only expected to go to 4' bgs, which is why the 9/10/2019 data only goes to 4'. The depths and sample location of BG19-02 were approved during a meeting MOC and Vertex had with Mr. Mike Bratcher, Mr. Robert Hamlet, Ms. Victoria Venegas. NMOCD also suggested deepening that background sample borehole as deep as possible before hitting groundwater. The first four feet of the original background sample location had already been approved for use in remediation, so those analytics were used and eventually, as were the deeper depths from the later, deeper borehole.

2. The 09/10/19 data for BG19-02 consists of only one page. I searched the compilation of reports in the pdf you sent to me for lab order 1909531, and that one page was all I could find. I would need the entire lab report to consider using this data.

I believe I have attached the lab report in question

3. It appears you only sent attachments 5-7 to me. Can you send me attachment 4 along with boring logs (if they aren't included with this attachment)?

Also attached

4. Was groundwater encountered at any time during this investigation? **Groundwater was not encountered during the remediation.**

Thanks.

Cristina Eads | 505-670-5601

From: Sanjari, Melodie (MRO) < msanjari@marathonoil.com >

Sent: Wednesday, April 22, 2020 11:10 AM

To: Eads, Cristina, EMNRD < <u>Cristina.Eads@state.nm.us</u>>; <u>ngordon@vertex.ca</u>

Cc: Johnson, Misti M. (MRO) < <u>mjohnson4@marathonoil.com</u>>

Subject: [EXT] RE: Trebuchet Fee 23 28 19 WXY #010H

Melodie Sanjari

Environmental Professional Marathon Oil Company – Permian Asset Cell - (575) 988-8753 4111 S. Tidwell Road Carlsbad, NM 88220



From: Sanjari, Melodie (MRO)

Sent: Wednesday, April 22, 2020 11:02 AM

To: 'Eads, Cristina, EMNRD' < Cristina.Eads@state.nm.us; ngordon@vertex.ca

Cc: Johnson, Misti M. (MRO) < <u>mjohnson4@marathonoil.com</u>>

Subject: RE: Trebuchet Fee 23 28 19 WXY #010H

Good Morning Ms. Eads,

I apologize for the late response. I have attached the file that includes the lab reports – because the file was so large we had to chop it up a bit so you might receive one or two more emails after this one with all of files.

As far as backgrounds are concerned, two background sample locations were established: BG19-17

(surface -6' bgs in 2' intervals taken 7/26/2019 – Hall Environmental pg 174) and BG19-02 (surface -14' bgs taken in 2' intervals on 10/26/2019 Xenco Labs pg 184 on report). BG 19-17 was the first background sample selected and it was done at the time of the initial characterization and was located just east of the pad. After the EM Survey was done, the initial fear was that the release was much larger than expected and it appeared to have run eastward off-pad. Because the first background location looked like it was what was believed to be the spill area at the time, a second location was just north of the pad (BG19-02). This second sample location was approved in a meeting with NMOCD District II as there was minimal admittance to the surrounding area due to the private landowner denying access. When research proved that the spill footprint was not larger, but naturally occurring elevated chlorides had skewed the EM, the more stringent of the two levels were chosen. BG19-17 was left off of the figures because it wasn't used to reach the adjusted closure criteria for chlorides. It was not removed from the table as it would have been included in the lab analysis appendix and we didn't want it to appear as if we omitted data that was collected.

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

Thank you

Melodie Sanjari

Environmental Professional Marathon Oil Company – Permian Asset Cell - (575) 988-8753 4111 S. Tidwell Road Carlsbad, NM 88220



From: Eads, Cristina, EMNRD < <u>Cristina.Eads@state.nm.us</u>>

Sent: Tuesday, April 21, 2020 3:04 PM

To: Sanjari, Melodie (MRO) < <u>msanjari@marathonoil.com</u>>; <u>ngordon@vertex.ca</u>

Subject: [External] FW: Trebuchet Fee 23 28 19 WXY #010H

Beware of links/attachments.

Good afternoon,

Please see the email message below. I sent this email a couple of weeks ago, but have yet to receive a response. I am forwarding to you both in case either of you can help me with my questions.

Thanks!

Cristina Eads | 505-670-5601

From: Eads, Cristina, EMNRD

Sent: Tuesday, April 7, 2020 12:16 PM

To: Johnson, Misti M. (MRO) < mjohnson4@marathonoil.com >

Subject: Trebuchet Fee 23 28 19 WXY #010H

Hi Misti,

I am reviewing the Closure Report for the Trebuchet Fee 23 28 19 WXY #010H, for incidents NAB1917554536 (2RP-5499); NAB1928156715 (2RP-5652), and I have a couple of questions. I checked our files and my emails, but I couldn't find the follow-up email with the additional attachment including the lab reports. Could you send it again, to me?

I also have a question about the background sample(s). This may be answered with the additional attachments. Was more than one background sample collected? I see data and a sample location for BG19-02. I see data for BG19-17, but I do not see a sample location for BG19-17 on any of the figures. Is the BG19-17 a typo? Or was an additional background sample taken?

Thanks for your help,

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division
5200 Oakland Avenue NE, Suite 100

Albuquerque, New Mexico 87113
505.670-5601

email: 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.