

Venegas, Victoria, EMNRD

From: Weaver, Crystal <caweaver@blm.gov>
Sent: Monday, April 1, 2019 2:47 PM
To: Venegas, Victoria, EMNRD
Cc: Barnhill, Amy D.; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Jim Amos (jamos@blm.gov); Deborah McKinney
Subject: [EXT] Re: [EXTERNAL] RE: 2RP-5204, 2RP-5272 and 2-20-19 spill

Hello Amy and Josie,

I don't have the C-141 for any other of the releases except for the one that occurred on 1/10/2019.

Aside from OCD's expectations of remediation you would also need to pursue advisement from the BLM on the circumstances of this location. I see that it is stated that 3 drilling related releases have occurred at this location. I am unaware of the volume of the third one you are mentioning. If these were submitted to the BLM they are not referable for some reason in our system. So through my own research using OCD's website I found the C-141s for two of the three releases that have 2RP-5204 and 2RP-5272 assigned to them. However, we still need Chevron to please send over to the BLM the C-141's for the other releases aside from the one that occurred on 1/10/2019.

As for advisement from the BLM, if Chevron is going to ask for an extension till December this year in order to perform remediation at this location, then the BLM would like to see statements in writing that all of the standing fluids were recovered and also see what the volumes were that were unrecoverable and where location wise were the impacts of the unrecoverable volumes (i.e. include a KMZ or some shape file indicating where contaminants hit surface).

Thank you,

Crystal Weaver

Environmental Protection Specialist

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"3 percent of the water on this planet is considered freshwater. Of that 3 percent only 1 percent is considered accessible, meaning the majority of the remaining 2 percent is trapped in glaciers or snowfields." - National Geographic

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Fri, Mar 29, 2019 at 11:48 AM Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us> wrote:

RE: 2RP-5204, 2RP-5272 and 2-20-19 spill

Ms. Barnhill,

OCD has received your extension request for 2RP-5204, 2RP-5272 and 2-20-19 spill, thank you. OCD understands the technical difficulties that a complete delineation/remediation activity presents at this time. The requested extension for the releases mentioned above is approved. However, be advised that **NMOCD recommends a completed Site Assessment/Characterization Plan be reviewed and approve BEFORE any significant remediation works towards closure.**

Regards,

Victoria Venegas

EMNRD

OCD-District II

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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.

From: Barnhill, Amy D. <ABarnhill@chevron.com>

Sent: Monday, March 25, 2019 11:37 AM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Barnhill, Amy D. <ABarnhill@chevron.com>

Subject: [EXT] 2RP-5204, 2RP-5272 and 2-20-19 spill

Mr. Hamlet and Ms. Venegas,

We have had three spills on the same pad. Two of those are listed above and the other has not been assigned an RP number yet that I can find. I have re-sent the original C-141 to you both in a previous e-mail.

We would like to requested an extension on submitting a workplan until December 31, 2019. The current projected date for drilling to move from this location is the end of April 2019. The completions crew will be rigging up in May and is projected to be on site through September due to the size of the pad, therefore, our third party contractor will not be able to access the location until after this date. If they try to get on site between drilling and completions, the bore sampling could compromise the compaction of the pad. We would like to ask for an extension until December 31, 2019. With the extended time, we will be able to access the location, collect samples and submit a work plan. We should also be able to have the site remediated by the end of the year, as well. Please let me know if this is acceptable. Thank you for your consideration.

Thank you,

Amy Barnhill

Waste and Water Specialist

MCBU

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