

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Geoff Leking"](#)  
**Cc:** [mbosshard@selectenergyservices.com](mailto:mbosshard@selectenergyservices.com); [Yolanda Jordan](#); [Shane Estep](#)  
**Subject:** RE: Devon Biliken 7 Federal 1H Delineation Work Plan  
**Date:** Friday, September 22, 2017 2:15:00 PM  
**Attachments:** approved\_1RP4687\_8.21.17 Devon Biliken 7 Federal 1H Delineation Work Plan.pdf

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Dear Mr. Leking:

NMOCD approves of the proposed delineation plan for 1RP-4687. Please see the attachment for your records.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

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**From:** Geoff Leking [mailto:[geoff@etechnv.com](mailto:geoff@etechnv.com)]  
**Sent:** Thursday, September 7, 2017 11:46 AM  
**To:** Pair, Randal <[rpair@blm.gov](mailto:rpair@blm.gov)>  
**Cc:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [mbosshard@selectenergyservices.com](mailto:mbosshard@selectenergyservices.com); Yolanda Jordan <[yjordan@blm.gov](mailto:yjordan@blm.gov)>; Shane Estep <[shane@etechnv.com](mailto:shane@etechnv.com)>  
**Subject:** Re: Devon Biliken 7 Federal 1H Delineation Work Plan

Randy

A. Yes we will begin delineating at one Ft intervals again.

B. We will segregate impacted from clean.

C. Thank you...we will backfill with cuttings unless directed by another regulatory entity otherwise.

Congratulations on your retirement. Future submittals will be sent to Yolanda.

Thank you, Randy.

Geoff Leking  
Etech  
Sent from my iPhone

On Sep 6, 2017, at 3:33 PM, Pair, Randal <[rpair@blm.gov](mailto:rpair@blm.gov)> wrote:

Mr. Lekking -

BLM approves this vertical-delineation plan. We note that this is only a plan for vertical delineation. Once depth of chlorides is determined, a remediation plan will have to be developed using that data; both BLM and OCD would need to also approve the remediation plan.

Some notes:

- A. Scope of work #2 - though not specified, I assume that if the chloride level at 8-ft depth exceeds 600 mg/kg, it will also be deepened as discussed for the other holes.
- B. Scope of work #9 - impacted and clean material must not be mixed prior to deciding whether the material must be hauled for disposal.
- C. Scope of work #10 - Since additional excavation to remove contaminated material will be required, I see no reason to formally abandon the holes. Plugging with drilled material (to keep small animals from falling in) is all BLM would require.
- D. It is my understanding that Devon partially treats this produced water, mostly to remove hydrocarbons; that may be the reason that no TPH or BTEX was detected. You might want to confirm that for the final report.
- E. I will be retiring from BLM effective 9/15/2017. Please send future correspondence to Yolanda Jordan Jimenez (cc's here).

Note to Yolanda - Shelley Tucker passed this to me because there is a R/W pipeline in this vicinity. However, it was not that pipeline that leaked. This surface pipeline was approved by a Sundry Notice by Jesse Bassett; I could have given it back to Shelley, but since she was buried in work, I decided to follow through.

Randal "Randy" Pair  
Envir. Protection Specialist - Realty Compliance  
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email: [rpair@blm.gov](mailto:rpair@blm.gov)

On Mon, Aug 21, 2017 at 12:48 PM, Geoff Leking <[geoff@etechenvironment.com](mailto:geoff@etechenvironment.com)> wrote:

Olivia and Randy

Etech Environmental and Safety Solutions is pleased to submit to you the above referenced document for your review. Please contact me with any questions or

concerns. Thank you.

## **Geoff Leking**

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