

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Lucas Middleton](#)  
**Cc:** [Groves, Amber](#)  
**Subject:** RE: Work Plan for Abo Empire ANGLE STATE #3, 1RP-4670  
**Date:** Wednesday, October 18, 2017 7:26:00 AM  
**Attachments:** image004.png  
image005.png

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Mr. Middleton:

Please be advised that the decision by the Responsible Operator to conduct delineation while remediating is considered an at-risk activity. NMOCD will agree to the proposed delineation/remediation plan for 1RP-4670 as long as the additional samples at least 5 ft. further in depth demonstrate BTEX, TPH extended, and chlorides are within permissible levels. To complete release characterization, 2 background samples near the edge of the playa to confirm non-impact are also required. NMOCD will upload photos to OCD online.

At a minimum, these items must be included in the remediation report:

- Scaled map with the locations of the delineation and confirmation bottom and sidewall samples marked, depth and dimensions of the excavation annotated, and release area outlined. GPS coordinates of the sample locations are requested.
- Laboratory analytical reports of samples tested by Method 8260 or 8021 for BTEX, Method 8015 extended for TPH, and Method 300 for chlorides.
- Photo documentation: georeferenced and dated.
- Soil bore logs if necessary.

Like approval from NMSLO is required. NMSLO may have additional stipulations regarding the playa.

Thanks,  
Olivia

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**From:** Lucas Middleton [mailto:[lucas.middleton@soudermiller.com](mailto:lucas.middleton@soudermiller.com)]  
**Sent:** Tuesday, October 17, 2017 3:28 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Subject:** RE: Work Plan for Abo Empire ANGLE STATE #3, 1RP-4670

Olivia Yu,  
Changes will be made for BTEX and TPH ranking due to the playa.  
A delineation will be done during the excavation on the site before closure.  
Can you please provide NMOCD pictures from the field inspection?

Thank you

Lucas Middleton  
Staff Scientist  
(575) 499-9244 (mobile)



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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, October 16, 2017 4:20 PM  
**To:** Lucas Middleton <[lucas.middleton@soudermiller.com](mailto:lucas.middleton@soudermiller.com)>  
**Cc:** [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)  
**Subject:** RE: Work Plan for Abo Empire ANGLE STATE #3, 1RP-4670

Mr. Middleton:

This release occurred on State surface and minerals. Please remember to include NMSLO in all communications and submissions of documents.

Please address these concerns regarding the delineation workplan for 1RP-4670:

1. The RRAL assessment is incorrect. There is a playa 200-500 ft. West of the release location. The permissible levels for BTEX and TPH need revision.
2. Delineation is not considered complete due to the presence of the surface water body. Release must be vertically delineation to minimum of 5 ft. bgs. Permissible chloride level is 250 mg/kg.
3. Photos taken by a NMOCD inspector indicated that the release area is larger than indicated on Figure 2. There is evidence of overspray onto the lease road and pasture.

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:** Lucas Middleton [<mailto:lucas.middleton@soudermiller.com>]

**Sent:** Monday, October 9, 2017 1:30 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Subject:** Work Plan for Abo Empire ANGLE STATE #3, 1RP-4670

Dear Olivia Yu,

I have attached a work plan for approval on a Abo Empire location named the ANGLE STATE #3, API# 30-0025-25347 1RP-4670

Call or Email with any question or comments.

Thank you and have a good day

Lucas Middleton  
Staff Scientist  
(575) 499-9244 (mobile)



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