

From: [Yu, Olivia, EMNRD](#)
To: "Cliff Brunson"; [Amber Groves](#)
Cc: [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)
Subject: RE: COG Pygmy 27 State #002H (1RP-4694) - Delineation Workplan
Date: Thursday, September 28, 2017 12:01:00 PM

Dear Mr. Brunson:

Please note that the eastern of the release is within 1000 ft. radius of a NMOSE well (CP00601 POD 1).

NMOCD will consider vertical delineation completed for 1RP-4694.

Please address these concerns regarding the proposed remedial activities.

1. Based on the data provided, the area represented by SP1, SP2, and SP14 does not require remediation. However, confirmation surface (0-6") samples of the edges are required to complete horizontal delineation.
2. Permissible chloride levels of 600 mg/kg are exceeded at 2 ft. bgs at the area represented by SP3-SP8 and SP11-SP13. NMOCD requires a 4 ft. excavation and a properly set liner.
3. NMOCD accepts that the area represented by SP9 and SP10 does not require remediation. However, confirmation surface samples of the edges of this area and sidewall samples at the border demarcating the SP9/10 area (pink) and SP8/SP11 (green) are required.
4. The proposed 1 ft. bgs excavation for the area represented by SP15-SP20 is granted.
5. Bottom and sidewall/edge samples for each of the proposed excavation areas are required. Distance between sample locations should be no greater than 50 ft. apart. At least one sample must be from the borders between the areas with differing excavation depths.
6. Provide a scaled map with the confirmation bottom and sidewall sample locations marked, liner location outlined, and depth of excavated areas annotated in the remediation report.

Please confirm or inform if clarification is required. NMSLO may have additional stipulations and concerns.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Thursday, September 14, 2017 6:54 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Amber Groves <agroves@slo.state.nm.us>
Cc: Becky Haskell <rhaskell@concho.com>; Ken Swinney <kswinney@bbcinternational.com>;
Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: COG Pygmy 27 State #002H (1RP-4694) - Delineation Workplan

Olivia and Amber,

Please find the attached Delineation Workplan and remediation proposal for the COG Pygmy 27 State #002H (1RP-4694). COG is requesting that you review this plan and is looking forward to both the OCD's and SLO's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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