

From: [Yu, Olivia, EMNRD](#)
To: ["Rebecca Haskell"; Cliff Brunson](#)
Cc: [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#); [Dakota Neel](#); [Sheldon Hitchcock](#)
Subject: RE: COG Pygmy 27 State #3H (1RP-4728) - Delineation Workplan
Date: Tuesday, December 19, 2017 2:34:00 PM

Ms. Haskell:

Thank you for the reminder. Indeed, I neglected to review the email from October 13 before responding RE: 1RP-4728.

Olivia

From: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Tuesday, December 19, 2017 2:09 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Cliff Brunson <cbrunson@bbcinternational.com>
Cc: Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>
Subject: RE: COG Pygmy 27 State #3H (1RP-4728) - Delineation Workplan

Ms. Yu,

I think there may be some confusion regarding this particular remediation site.

1. You sent out an email on October 13, 2017 (subsequent to the September 19, 2017 email), were you granted permission to conduct tilling as long as confirmation samples were collected at 6 inches. Additionally, the landowner has agreed upon this action. You, myself and Mr. Brunson met in your office on November 14, 2017, and discussed this project and you seemed agreeable at that time. **I assure you that if the confirmation samples come back over NMOCD requirements COG will have the impacted soil removed.**

COG confirms that 2 and 3 below will occur and a statement of liner integrity and photo documentation will be provided.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, December 19, 2017 1:04 PM
To: Cliff Brunson
Cc: Rebecca Haskell; Ken Swinney; Jennifer Gilkey; Kathy Purvis
Subject: [External] RE: COG Pygmy 27 State #3H (1RP-4728) - Delineation Workplan

**** External email. Use caution. ****

Mr. Brunson:

Furthermore, a statement of liner integrity and photo documentation for affirmation are required as a portion of the release occurred in the lined facility.

Thanks,
Olivia

From: Yu, Olivia, EMNRD
Sent: Tuesday, December 19, 2017 12:01 PM
To: 'Cliff Brunson' <cbrunson@bbcinternational.com>
Cc: Becky Haskell <rhaskell@concho.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>
Subject: RE: COG Pygmy 27 State #3H (1RP-4728) - Delineation Workplan

Mr. Brunson:

NMOCD will consider delineation as complete for 1RP-4728.

However, as mentioned in the email dated September 19, 2017, regarding remedial activities:

1. Tilling is not acceptable for the area represented by SP6 – 9. Surface TPH levels exceed permissible concentrations at SP6 and SP7, and perhaps SP8 and SP9 as well since MRO levels were not provided. NMOCD requires a minimum of 6-inch removal for the area represented by SP6 - SP9.
2. Confirmation sample locations at 1.5 ft. bgs in the area represented by SP3 - SP5 needs to be marked on an appropriately scaled map in the remediation report.
3. One confirmation sidewall sample location must be at the border between the proposed 2 ft. excavation (pink) and the area with no remediation (blue).

Please confirm or inform for clarification.

Thanks,
Olivia

From: Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Wednesday, November 22, 2017 1:46 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@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 #3H (1RP-4728) - Delineation Workplan

Olivia,

Please find the attached Delineation Workplan and remediation proposal for the COG Pygmy 27 State #3H (1RP-4728). COG is requesting that you review this plan and is looking forward to the OCD's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
President
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World-Wide Environmental Specialists
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From: [Yu, Olivia, EMNRD](#)
To: [Rebecca Haskell](#); [Cliff Brunson](#)
Cc: ["Ken Swinney"](#); ["Jennifer Gilkey"](#); ["Kathy Purvis"](#); [Dakota Neel](#); [Aaron Lieb](#); [Sheldon Hitchcock](#)
Subject: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan
Date: Friday, October 13, 2017 8:12:00 AM
Attachments: image003.png
image001.png

Good morning Ms. Haskell:

NMOCD still requires data indicating that the release has been characterized for 1RP-4728.

1. Based on the provided data, the implication is the area represented by SP3-SP5 did not have any pooling locations with a southwesterly slope. Correct assumption? Provide photo documentation as evidence.
2. NMOCD will agree to tilling of the area represented by SP6-8. However, since the surface samples for SP6 and SP7 were above permissible TPH values, discrete confirmatory samples in the approximate locations at 6 inches are required before and after tilling. Laboratory analyses for TPH extended (GRO, DRO, MRO) using Method 8015.
3. NMOCD will agree to the proposed 2 ft. excavation for the area represented by SP1-SP2. Laboratory analyses for chlorides (Method 300) and TPH extended (GRO, DRO, MRO) using Method 8015.
4. Confirmation samples are required for the edges of the areas represented by SP1-SP2, SP3-SP5, and SP6-SP8 to complete release characterization. Sample locations cannot be greater than 50 ft. apart.
5. Provide a scaled map with the sample locations for confirmatory edges, sidewalls, and bottoms marked.

Please confirm or inform if clarification is required.

Thanks,
Olivia

From: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Thursday, October 12, 2017 3:42 PM
To: Groves, Amber <agroves@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Cliff Brunson <cbrunson@bbcinational.com>
Cc: 'Ken Swinney' <kswinney@bbcinational.com>; 'Jennifer Gilkey' <jgilkey@bbcinational.com>; 'Kathy Purvis' <kathy@bbcinational.com>; Dakota Neel <DNeel2@concho.com>; Aaron Lieb <ALieb@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>
Subject: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan

Ms. Groves,

This spill location is on Private Surface. You were included because it is State Minerals (I am not sure if you want to be included when it is state minerals or not). We met with the surface owner yesterday to go over the work plan and will be sending an email to him to get written agreement

from him which will be forwarded to Ms. Yu. I apologize for any confusion this may have caused. I hope you have a great evening and please let me know if you have any additional questions or concerns.

Thank You,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Groves, Amber [<mailto:agroves@slo.state.nm.us>]
Sent: Thursday, October 12, 2017 3:32 PM
To: Yu, Olivia, EMNRD; Cliff Brunson
Cc: Rebecca Haskell; 'Ken Swinney'; 'Jennifer Gilkey'; 'Kathy Purvis'
Subject: [External] RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan

**** External email. Use caution. ****
Cliff,

Below are my questions on this work plan:

- ❖ Can you please submit photo documentation of the release area?
- ❖ What is your explanation/reasoning on the area of SP3-5 being non-detect on the surface?

Thank you,

Amber Groves
Remediation Specialist
Field Operations Division
(575)392-3697
(575)263-3209 cell
New Mexico State Land Office
2827 N. Dal Paso Suite 117
Hobbs, NM 88240

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, October 04, 2017 8:17 AM
To: Cliff Brunson <cbrunson@bbcinternational.com>; Groves, Amber <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: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan

Mr. Brunson:

NMOCD will confer with NMSLO regarding the proposed remedial activities for 1RP-4728.

Thanks,
Olivia

From: Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Friday, September 22, 2017 12:35 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: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan

Olivia,

Please find the following responses to your concerns:

1. Surface samples were only submitted since no impact was found on the surface. There are no field tests at deeper depths since no impact was found on the surface. This was a sort of wash out area. COG believes vertical delineation has been complete.
2. COG will conduct confirmation sampling after the tilling of the area and if the TPH values are verified below 5,000 mg/kg then the remediation will be complete.
3. Bottom and sidewall confirmation samples will be collected in the area of the 2 foot excavation.

COG believes this addresses your concerns and looks forward to your confirmation and proceeding on this remediation.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, September 19, 2017 2:02 PM
To: Cliff Brunson <cbrunson@bbcinternational.com>; 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: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan

Dear Mr. Brunson:

Please address these concerns regarding the delineation workplan for 1RP-4728:

1. What is the rationale for only surface samples at SP3-5? If field tests were conducted at deeper depths at these sample locations, please provide data. Otherwise, due to the magnitude of the release and distance between sample locations, vertical delineation is considered incomplete.
2. TPH values at SP6 and SP7 exceed permissible levels of 5000 mg/kg. Tilling is not an acceptable remedial activity unless there is an accompanying monitoring or resampling plan of the area with tilled soil.
3. Bottom and sidewall confirmation samples are required for each of the 3 areas with differing proposed remedial activities. Sidewall/edge samples are required to complete horizontal delineation and release characterization.
4. Method 8015 extended for TPH (GRO, DRO, and MRO) is required for confirmation samples.\

Thanks,
Olivia

From: Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]
Sent: Tuesday, August 29, 2017 3:51 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 #3H (1RP-4728 - Delineation Workplan

Olivia and Amber,

Please find the attached Delineation Workplan and remediation proposal for the COG Pygmy 27 State #3H (1RP-4728). 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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From: [Yu, Olivia, EMNRD](#)
To: "Cliff Brunson"; [Amber Groves](#)
Cc: [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)
Subject: RE: COG Pygmy 27 State #3H (1RP-4728 - Delineation Workplan
Date: Tuesday, September 19, 2017 2:02:00 PM

Dear Mr. Brunson:

Please address these concerns regarding the delineation workplan for 1RP-4728:

1. What is the rationale for only surface samples at SP3-5? If field tests were conducted at deeper depths at these sample locations, please provide data. Otherwise, due to the magnitude of the release and distance between sample locations, vertical delineation is considered incomplete.
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4. Method 8015 extended for TPH (GRO, DRO, and MRO) is required for confirmation samples.\

Thanks,
Olivia

From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Tuesday, August 29, 2017 3:51 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 #3H (1RP-4728 - Delineation Workplan

Olivia and Amber,

Please find the attached Delineation Workplan and remediation proposal for the COG Pygmy 27 State #3H (1RP-4728). 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
President
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