

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Green, Nikki"; Price, Henryetta](#)  
**Cc:** [Rebecca Haskell; stucker@blm.gov; Billings, Bradford, EMNRD](#)  
**Subject:** RE: 1RP-4610 - Amended Blue Jay Federal #001H Investigation Summary and Proposed Remediation Workplan  
**Date:** Friday, December 22, 2017 2:26:00 PM  
**Attachments:** approved\_1RP4610\_Amended Blue Jay Federal #001H Battery Investigation Summary and Proposed Remediation Workplan\_final.pdf

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Ms. Green:

NMOCD approves of the proposed remediation plan for 1RP-4610 with these clarifications:

- If bottom confirmation samples at 6-8 inches of the stockpiled soil exceeds permissible levels of TPH extended, the entire stockpiled soil must be removed.
- All confirmation samples must be discrete.

Like approval from BLM required.

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:** Green, Nikki [mailto:[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)]  
**Sent:** Monday, December 4, 2017 4:04 PM  
**To:** Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)>; Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; stucker@blm.gov; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** 1RP-4610 - Amended Blue Jay Federal #001H Investigation Summary and Proposed Remediation Workplan

Good Afternoon All,

TRC, on behalf of COG Operating, LLC, has prepared the attached Amended Soil Investigation Summary and Proposed Remediation Workplan for the COG Blue Jay Federal #001H Release Site. Upon your approval, COG is prepared to begin the activities outlined in the Workplan. Please feel free to contact Becky Haskell or myself with any questions.

Thank you,

Nikki Green  
Project Manager



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**From:** Price, Henryetta [<mailto:hprice@blm.gov>]  
**Sent:** Tuesday, November 07, 2017 2:49 PM  
**To:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>  
**Cc:** Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>; Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** Re: [External] Re: 1RP-4610 - Blue Jay Federal #001H Battery - Schedule Field Activities

Thank you.

## Henryetta Price

Environmental Protection Specialist  
Bureau Of Land Management  
[Hprice@blm.gov](mailto:Hprice@blm.gov)  
Phone 575-234-5951  
Cell 575-706-2780  
Fax 575-234-5927

On Tue, Nov 7, 2017 at 1:47 PM, Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)> wrote:

Ms. Price,

TRC is currently working on the work plan revision and will have something to you soon.

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](mailto:rhaskell@concho.com)



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**From:** Price, Henryetta [mailto:[hprice@blm.gov](mailto:hprice@blm.gov)]

**Sent:** Tuesday, November 07, 2017 2:06 PM

**To:** Green, Nikki

**Cc:** Rebecca Haskell; Yu, Olivia, EMNRD; Lowry, Joel; [stucker@blm.gov](mailto:stucker@blm.gov); Billings, Bradford, EMNRD

**Subject:** [External] Re: 1RP-4610 - Blue Jay Federal #001H Battery - Schedule Field Activities

Nikki,

Do you have a revised work plan or closure report for this site?

Thanks.

**Henryetta Price**

Environmental Protection Specialist

Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

Phone 575-234-5951

Cell 575-706-2780

Fax 575-234-5927

On Thu, Sep 7, 2017 at 9:24 AM, Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)> wrote:  
Sounds good. Thank you.

**Henryetta Price**

Environmental Protection Specialist

Bureau Of Land Management

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Cell 575-706-2780

Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Thu, Sep 7, 2017 at 7:40 AM, Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)> wrote:  
We should arrive onsite between 10:00 AM – 11:00 CST.

**From:** Price, Henryetta [mailto:[hprice@blm.gov](mailto:hprice@blm.gov)]

**Sent:** Wednesday, September 06, 2017 3:38 PM

**To:** Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>

**Cc:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [stucker@blm.gov](mailto:stucker@blm.gov); Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** Re: 1RP-4610 - Blue Jay Federal #001H Battery - Schedule Field Activities

Good Afternoon,

I think I will meet you all out on location. Do you have an estimated time for sampling?

## Henryetta Price

Environmental Protection Specialist  
Bureau Of Land Management

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Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Wed, Sep 6, 2017 at 1:31 PM, Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)> wrote:

Good Afternoon Ms. Yu and Ms. Price,

TRC, on behalf of COG Operating, LLC, will perform sampling activities at the Blue Jay Federal #001H Battery on 9/8/17. TRC will collect the two (2) requested soil samples from the overspray area from approximately 0-6" bgs and resample the affected area as discussed in previous emails, which have been included below for your convenience. Please feel free to contact me with any questions.

Thank you,

Nikki Green  
Project Manager



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**From:** Rebecca Haskell [mailto:[RHaskell@concho.com](mailto:RHaskell@concho.com)]

**Sent:** Wednesday, September 06, 2017 9:10 AM

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

**Cc:** Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [hprice@blm.gov](mailto:hprice@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov); Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Thank you Ms. Yu.

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](mailto:rhaskell@concho.com)



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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Wednesday, September 06, 2017 9:08 AM  
**To:** Rebecca Haskell  
**Cc:** Lowry, Joel; [hprice@blm.gov](mailto:hprice@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov); Nikki Green ([ngreen@trcsolutions.com](mailto:ngreen@trcsolutions.com)); Billings, Bradford, EMNRD  
**Subject:** [External] RE: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Ms. Haskell:

The suggestions were not intended to imply that a temporary groundwater monitoring well or a search of private water wells are required. Rather, if the depth of groundwater is determined, then potentially no remediation is necessary using the RRAL of 0 with total TPH permitted at 5000 mg/kg. Nevertheless, since COG agreed to resample the TPH-impacted soil, NMOCD sincerely appreciates COG's efforts to remediate to more stringent levels.

Thanks,  
Olivia

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**From:** Rebecca Haskell [<mailto:RHaskell@concho.com>]  
**Sent:** Wednesday, September 6, 2017 7:50 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [hprice@blm.gov](mailto:hprice@blm.gov); [stucker@blm.gov](mailto:stucker@blm.gov); Nikki Green ([ngreen@trcsolutions.com](mailto:ngreen@trcsolutions.com)) <[ngreen@trcsolutions.com](mailto:ngreen@trcsolutions.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** FW: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Ms. Yu,

The release cleans up to the most stringent NMOCD remediation standards within 1.5 feet. We are remediating the site to <50 feet to groundwater standards. There is no reason COG should install a temporary groundwater monitoring well or investigate the presence of private water sources in the vicinity of this release. This release poses no threat to groundwater.

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  
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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Wednesday, September 06, 2017 8:30 AM  
**To:** Lowry, Joel; Price, Henryetta; Rebecca Haskell  
**Cc:** [stucker@blm.gov](mailto:stucker@blm.gov); Green, Nikki; Billings, Bradford, EMNRD  
**Subject:** [External] RE: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

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

Good morning Mr. Lowry:

Acknowledged. NMOCD is not aware of other sources of depth to groundwater data. Other suggestions would be to drill a temporary groundwater monitoring well or investigate the presence of private water sources in the vicinity.

Thanks,  
Olivia

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**From:** Lowry, Joel [<mailto:JLowry@trcsolutions.com>]  
**Sent:** Tuesday, September 5, 2017 4:34 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)>; [rhaskell@concho.com](mailto:rhaskell@concho.com)  
**Cc:** [stucker@blm.gov](mailto:stucker@blm.gov); Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Henryetta and Olivia,

Concho agrees that it would be advantageous to go ahead and resample the affected area in an effort to better characterize the current site conditions. Upon receiving laboratory analytical results from the collected soil samples, TRC will prepare an amended *Soil Investigation Summary and Proposed Remediation Workplan* for BLM and NMOCD consideration.

Given that chloride concentrations are low, and that hydrocarbon impacts appear to be largely limited to the surface within the affected pasture, an effective method of in-situ remediation may be given consideration, pending NMOCD and BLM approval. This may help limit the amount of topsoil that will be displaced.

I have not been able to locate any depth to groundwater data for this section on the NMOSE database. The Chevron Water Trend Map suggests that groundwater may be encountered around 50' bgs. If there is any additional depth to groundwater information available please let us know.

If you have any questions or suggestions, please let us know. Thanks.

Respectfully,

**Joel Lowry**

Senior Project Manager



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

**Sent:** Tuesday, September 5, 2017 4:33 PM

**To:** Price, Henryetta <[hprice@blm.gov](mailto:hprice@blm.gov)>; Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [rhaskell@concho.com](mailto:rhaskell@concho.com)

**Cc:** [stucker@blm.gov](mailto:stucker@blm.gov); Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Dear Ms. Haskell:

NMOCD is in agreement with BLM with an additional stipulation. Due to the large discrepancy between the depth of water table at this location between NMOSE database and the Chevron Water Trend Map, NMOCD requests verification of the depth to

groundwater. If the depth to groundwater is >100 ft. bgs, then no remedial activities are potentially necessary.

Thanks,  
Olivia

**From:** Price, Henryetta [<mailto:hprice@blm.gov>]

**Sent:** Thursday, August 31, 2017 11:32 AM

**To:** Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>; [rhaskell@concho.com](mailto:rhaskell@concho.com); Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** [stucker@blm.gov](mailto:stucker@blm.gov); Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>

**Subject:** Re: 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Good Morning Joel,

I just realized the majority of the stockpile of topsoil has been affected. And that chlorides are low. Given the amount of time the contaminants have been on location, I am requesting to have the area resampled to see if the TPH numbers come down significantly where we can treat in place and utilize the topsoil. Of course if NMOCD is good with the recommendation.

Also,

Rebecca, we will need to figure out where the reclamation will be accounted for since I am assuming no reclamation will be done on this location.

## Henryetta Price

Environmental Protection Specialist

Bureau Of Land Management

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Fax 575-234-5927

\* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Thu, Aug 31, 2017 at 10:25 AM, Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)> wrote:

Dear Mr. Lowry:

Given the timeframe between release and sample date, NMOCD will consider the delineation complete for 1RP-4610. A few points of clarification to the proposed remedial activities:

- 1) Laboratory analyses (BTEX, TPH, and chlorides) of bottom and sidewall confirmation samples for each of the 3 proposed excavated areas are required, in addition to the sample locations to complete horizontal delineation of the release.
- 2) Minimum of 2 surface (0-6") confirmation samples in the impacted pasture area.



3) Blended excavated soil is not permitted.

Please confirm.

Thanks,

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

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**From:** Lowry, Joel [mailto:[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)]  
**Sent:** Friday, August 18, 2017 1:55 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [hprice@blm.gov](mailto:hprice@blm.gov);  
[stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** [rhaskell@concho.com](mailto:rhaskell@concho.com); Green, Nikki <[NGreen@trcsolutions.com](mailto:NGreen@trcsolutions.com)>  
**Subject:** 1RP-4610 - Blue Jay Federal #001H Battery - Soil Investigation Summary and Proposed Remediation Workplan

Please find attached the *Soil Investigation Summary and Proposed Remediation Workplan* that has been prepared for COG Operating's Blue Jay Federal #001H Battery environmental remediation site. The release site is located in UL "O", Sec. 18, Township 20 South, Range 35 East in Lea County, NM. Upon your review and approval, COG is prepared to begin the activities outlined in the attached *Workplan*.

If you have any questions or need any additional information, please feel free to contact Becky Haskell at 432-818-2372 or Nikki Green at 432-664-6699. Thanks!

Respectfully,

**Joel Lowry**

Senior Project Manager



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