From: Yu, Olivia, EMNRD

To: <u>Chan Patel</u>; <u>"Groves, Amber"</u>

Cc: "William Baldwin"; "Freeman Young"; "John Sullivan"; "Don Dunbar"; "Les Teague"

Subject: RE: State AB SWD#1 Work Plan

Date: Wednesday, November 29, 2017 12:09:00 PM

Mr. Patel:

Please address these concerns related to the proposed delineation plan for 1RP-4836:

- 1. Please be advised that NMOCD does not consider a caliche layer as an acceptable rationale for completion of delineation.
- 2. Due to the depth to groundwater < 50 ft and that 1RP-3961 remains unresolved, NMOCD requires a proportion of the proposed sample locations to have additional vertical delineation for chlorides. These sample locations must be representative of probable pooling locations. Laboratory analyses of chlorides must be of the depths that permissible levels of 600 mg/kg were obtained and maintained 10 ft. further.</p>
- 3. At least two depths for each sample location must demonstrate permissible levels of BTEX, TPH extended, and chlorides.
- 4. All samples submitted to a laboratory must have accompanying field data. Provide field data for all sample depths that were not sent for lab analyses.
- 5. Outline on a scaled map, the release areas for 1RP-3961 and 1RP-4836 with the associated proposed delineation sample locations demarcated.
- 6. Grab samples must be discrete.
- 7. One or more discrete soil samples from the base of the stockpile is required.
- 8. Please note that there are 3 NMOSE water wells within 1000 ft. of the release location, which alters the RRALs, even though permissible levels of Benzene, BTEX, and TPH remains the same.

Please confirm or inform if clarification is requested.

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: Chan Patel [mailto:chan.patel@entechservice.com]

Sent: Monday, November 20, 2017 2:20 PM

To: 'Groves, Amber' <agroves@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> **Cc:** 'William Baldwin' <William.Baldwin@cjes.com>; 'Freeman Young' <Freeman.Young@cjes.com>; 'John Sullivan' <John.Sullivan@cjes.com>; 'Don Dunbar' <Don.Dunbar@cjes.com>; 'Les Teague' <Les.Teague@cjes.com>

Subject: State AB SWD#1 Work Plan

Hi Amber and Olivia

EnTech is pleased to submit work plan to address the State AB SWD #1 facility on behalf of C&J Energy Services. Upon your review should you have any questions please do not hesitate to contact us.

Regards

Chan Patel
EnTech Consulting Corporation
21Waterway Avenue
Suite 300

Mobile: (713) 201-5704 Office: (281) 362-2714

Email: <u>chan.patel@entechservice.com</u>
Website: <u>www.entechservice.com</u>



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 From:
 Yu, Olivia, EMNRD

 To:
 Les Teague; Groves, Amber

 Cc:
 Chan Patel; Don Dunbar; John Srock

Subject: RE: State Land SWD #1 Request for Work Plan Extension

Date: Wednesday, November 1, 2017 2:16:00 PM

Attachments: image001.png

Mr. Teague:

NMOCD approves of the extension for 1RP-4836. The revised deadline is November 18, 2017.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I Olivia.yu@state.nm.us 575-393-6161 x113

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From: Les Teague [mailto:Les.Teague@cjes.com] **Sent:** Wednesday, November 1, 2017 10:51 AM

To: Groves, Amber <agroves@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Chan Patel <chan.patel@entechservice.com>; Don Dunbar <Don.Dunbar@cjes.com>; John Srock <John.Srock@cjes.com>

Subject: State Land SWD #1 Request for Work Plan Extension

Ms. Yu:

Per our discussion yesterday, C&J requests an extension of two weeks (November 18th) so we can revise our tentative work plan in order to address the additional concerns voiced by OCD and the SLO. We will submit the proposed work plan to your attention with copies to the SLO for comment by Ms. Groves as well.

I appreciate both yourself and Ms. Groves taking time out of your morning yesterday to visit with myself and C&J operations group.

If you have any additional concerns or questions, please let me know.



Les Teague, SSH Director of Environmental

C&J Energy Services, Inc. 3990 Rogerdale Houston, TX 77042

Direct: 713-325-6266 Cell: 281-731-6469

cjenergy.com

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From: John Sullivan

 To:
 Groves, Amber; Yu. Olivia, EMNRD

 Subject:
 Re: State AB SWD #1 (30-025-23786)

 Date:
 Thursday, October 12, 2017 7:42:34 PM

Attachments: image002.png image005.png

Thanks for your reply. Yes we will include the full extent. It was well documented by our field staff.

John Sullivan, P.G.

Manager, SWD Assets/
Environmental Specialist

C&J Energy Services, Inc. 3300 North Ave. A, Bldg 2, Ste 200

Midland, Texas 79706 Cell: 432-276-9899

john.sullivan@cjes.com | cjenergy.com | CJ

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From: Groves, Amber <agroves@slo.state.nm.us>
Sent: Thursday, October 12, 2017 3:56:12 PM

To: Yu, Olivia, EMNRD; John Sullivan

Subject: [EXTERNAL] RE: State AB SWD #1 (30-025-23786)

Mr. Sullivan,

Please include the previously mentioned pasture impact in your site delineation.

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 9:03 AM

To: John Sullivan <John.Sullivan@cjes.com>; Groves, Amber <agroves@slo.state.nm.us>

Subject: RE: State AB SWD #1 (30-025-23786)

Mr. Sullivan:

Based on the information provided by NMSLO, the release volume has been changed to unknown.

The 1RP for this incident is

					30-025-		
4836	10/4/2017	Α	C&J Energy Services	State AB SWD	23786	19S-37E-3C	9/6/2017

Please note that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

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: John Sullivan [mailto:John.Sullivan@cjes.com]

Sent: Friday, September 29, 2017 10:07 AM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; Groves, Amber < agroves@slo.state.nm.us >

Subject: RE: State AB SWD #1 (30-025-23786)

According to our yard manager who oversaw the response, the volume is based on direct recovery volume from the yard location where the water pooled near the tank.

John Sullivan, P.G. Manager SWD Assets/ Environmental Specialist 432-276-9899

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

Sent: Thursday, September 28, 2017 4:01 PM

To: John Sullivan < <u>John.Sullivan@cjes.com</u>>; Groves, Amber < <u>agroves@slo.state.nm.us</u>>

Subject: [EXTERNAL] RE: State AB SWD #1 (30-025-23786)

Dear Mr. Sullivan:

Thank you for the submission of the C-141 form on time. Please provide rationale and calculations to support the release volume. Otherwise, NMOCD will process this as an unknown volume due to the current status of the release site.

Thanks Olivia

From: John Sullivan [mailto:John.Sullivan@cjes.com]
Sent: Thursday, September 28, 2017 2:47 PM

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; Groves, Amber < agroves@slo.state.nm.us >

Cc: Mann, Ryan < rmann@slo.state.nm.us>
Subject: RE: State AB SWD #1 (30-025-23786)

Good afternoon. Our director of Environmental in Houston was to submit this today and I have not heard that he had, so please see the attached c-141.

John Sullivan, P.G. Manager SWD Assets/ Environmental Specialist 432-276-9899

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

Sent: Tuesday, September 26, 2017 4:47 PM

To: Groves, Amber <agroves@slo.state.nm.us>; John Sullivan <<u>John.Sullivan@cjes.com</u>>

Cc: Mann, Ryan < rmann@slo.state.nm.us>

Subject: [EXTERNAL] RE: State AB SWD #1 (30-025-23786)

Mr. Sullivan:

NMOCD still requires written notification of this release on a form C-141. Please submit electronically an initial C-141 by September 28, 2017.

Currently, C&J Well Services is not in compliance with NMAC 19.15.29.

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: Groves, Amber [mailto:agroves@slo.state.nm.us]

Sent: Wednesday, September 6, 2017 2:32 PM

To: john.sullivan@cjes.com

Cc: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; Mann, Ryan < rmann@slo.state.nm.us >

Subject: State AB SWD #1 (30-025-23786)

Good Afternoon, John,

Upon a recent field inspection, SLO noted that there seems to have been a recent release at the above mentioned site. Due to the amount of soil that has been excavated at this time and the unresolved open RP (1RP-3961) from a lightning strike in 2015, I am requesting a C-141 be submitted to NMOCD. There does appear to be some pasture impact and it is unknown if it is from this release or the previous release. I have included Olivia Yu with NMOCD on this e-mail for your convenience on the submittal and please keep me on the e-mail chain for the submittal, the delineation plan and the work plan.

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

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