

From: [Yu, Olivia, EMNRD](#)
To: ["Wright, Justin K"](#)
Cc: [Oberding, Tomas, EMNRD](#)
Subject: Response to RPs discussed on 3/14/2017 meeting
Date: Friday, March 17, 2017 3:49:00 PM

Justin:

Responses to your questions about the 1RPs that we discussed during our meeting on 3/14/2017. Please confirm whether they address your concerns and inform what the next course of action is for each of these RPs.

1RP-4233: EVGSAU 3366-029

- NMOC's position is that any release that occurred over an existing drilling pit, requires delineation and remediation. The status of a closed drilling pit is reopened.

1RP-4202: EVGSAY Injection header #4

- At Vertical 3, 6, 8, and 11: vertically delineate to 600 mg/kg chloride and maintained for 10 ft. below.
- Provide analytical laboratory analyses for at least two depths at these sample locations.
- All field chloride titration tests must be included. Any samples sent for laboratory analyses must have corresponding field data for correlation.

1RP-4263: MCA Battery 2

- Any sample sent for laboratory analyses (BTEX, TPH, chloride) must have corresponding field data. Provide all laboratory documentation.
- Establish 2 sample locations within the fenced area.
- Vertically delineate at all sample locations until permissible levels of Benzene, BTEX, TPH are obtained and maintained for 3 ft. below. At a minimum, send a midpoint and bottom confirmation samples for laboratory analysis.

1RP-4218: SEMU Permian 34

Historical

- Establish additional sample location in the asphaltine area. Somewhere center of Verticals 1, 2, 3.
- Vertical 1 & 3: obtain 50 mg/kg TPH and maintained for 3 ft. below. At a minimum, bottom and 1 other depth must have laboratory analyses.

Initial

- Complete vertical delineation is required at all 4 sample locations to 250 mg/kg chloride and maintained for an additional 10 ft. below. For BTEX and TPH, obtain permissible levels and maintained for 3 ft. below. Confirmation bottom samples must have laboratory analyses.
- Provide all field data and all laboratory data must have corresponding field data for correlation.

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: [Yu, Olivia, EMNRD](#)
To: [Oberding, Tomas, EMNRD](#); [Billings, Bradford, EMNRD](#)
Subject: Workplan CAP for the SEMU 034 1RP-4218
Date: Friday, March 10, 2017 7:18:00 AM

Email thread with workplan conditions by BLM at the bottom for this afternoon's discussion.

From: Yu, Olivia, EMNRD
Sent: Thursday, March 9, 2017 3:45 PM
To: 'Tucker, Shelly' <stucker@blm.gov>; Wright, Justin K <Justin.Wright@conocophillips.com>
Subject: RE: Fwd: FW: CAP for the SEMU 034 1RP-4218

Dear Mr. Wright:

NMOCD requests that further vertical delineation is required. Please indicate sampling methodology.

Historical release:

Vertical 1 and 3 show sharp increases in TPH levels from 2 to 4 ft. bgs. Delineate to 10 ft. at Vertical 1 and obtain confirmation samples with depth intervals no greater than 5 ft. (i.e., collect a sample at 7 ft. and 10 ft. bgs). At Vertical 3, delineate until permissible levels of TPH are obtained and maintained for an additional 10 ft.

Initial release:

Vertical 1: Further vertical delineation is required for TPH: obtain permissible levels and maintained for an additional 10 ft. bgs. Laboratory analyses of confirmation bottom samples for TPH, BTEX, and chlorides are requested.

Vertical 2-4: vertically delineate additional 10 ft. with sample depth intervals no more than 5 ft. to confirm that chloride levels are maintained. In other words, to 13 ft. bgs at Vertical 2, to 15 ft. bgs at Vertical 3, and to 14 ft. bgs for Vertical 4.

Please confirm and resubmit a modified delineation report with all required documents in one packet to facilitate review.

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: Tucker, Shelly [<mailto:stucker@blm.gov>]
Sent: Wednesday, February 15, 2017 3:26 PM
To: Wright, Justin K <Justin.Wright@conocophillips.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Re: Fwd: FW: CAP for the SEMU 034 1RP-4218

That works for me.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Wed, Feb 15, 2017 at 3:23 PM, Wright, Justin K <Justin.Wright@conocophillips.com> wrote:

Thank you Shelly, once I have received an email from Olivia on this location I will add the changes

to the work plan and send it back out.

From: Tucker, Shelly [mailto:stucker@blm.gov]
Sent: Wednesday, February 15, 2017 3:13 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Wright, Justin K <Justin.Wright@conocophillips.com>
Subject: [EXTERNAL]Fwd: FW: CAP for the SEMU 034 1RP-4218

Olivia,

This is my approval with stipulations.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

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----- Forwarded message -----

From: **Tucker, Shelly** <stucker@blm.gov>
Date: Wed, Feb 15, 2017 at 3:06 PM

Subject: Re: FW: CAP for the SEMU 034 1RP-4218
To: "Wright, Justin K" <Justin.Wright@conocophillips.com>
Cc: "olivia.yu@stte.nm.us" <olivia.yu@stte.nm.us>

Justin,

Upon review of your submitted work plan, BLM agrees to the removal of the top 4' of the initial release area. BLM does request the following stipulations, due to OSE records showing the DGW is $\leq 55'$:

1. SP1 from the initial release site will need to be delineated to reach RRALs for TPH.

In regards to the historic area:

1. The chloride and TPH levels are not significantly elevated on SP1 and SP 2. The BLM would prefer the area be addressed in place without excavating the impacted material.
2. SP 3 will need to be delineated to reach RRALs for TPH. Upon delineation, we can discuss remediation options.

Once you have delineated the aforementioned points, we can discuss whether or not a liner will need to be added to encapsulate the remaining impact below 4'

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

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On Wed, Feb 15, 2017 at 1:38 PM, Wright, Justin K <Justin.Wright@conocophillips.com> wrote:

From: Wright, Justin K

Sent: Wednesday, February 15, 2017 1:17 PM

To: 'Lynch, Kristen, EMNRD' <Kristen.Lynch@state.nm.us>; 'Tomas.Oberding@state.nm.us' (Tomas.Oberding@state.nm.us) <Tomas.Oberding@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>

Cc: Wright, Justin K <Justin.Wright@conocophillips.com>

Subject: CAP for the SEMU 034

Please look over this work plan and let me know if you have any questions or concerns or I will await approval to start.