From: Yu, Olivia, EMNRD

To: "Andrew Parker"

Cc: taylorp@pride-energy.com; mattp@pride-energy.com; Randall Hicks; agroves@slo.state.nm.us; Billings,

Bradford, EMNRD

Subject: RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Date: Thursday, December 28, 2017 8:19:00 AM

Mr. Parker:

Please address these concerns regarding the delineation workplan for 1RP-4625:

- As the release area includes the portion inside the berm for the tank battery, at least one sample location be established within the berm.
- There is a discrepancy between the text and Figure 2. Sample trenches need to be established to characterize the impacted area, although one or more sample trenches should also be outside of the impacted area for background data.
- Due to the geology of a playa, NMOCD requires that a borehole, rather than a sample trench, be established for delineation.
- The laboratory results from July 5, 2017, were for samples taken at the **well** not tank battery. There is no aerial imagery from 2017 supporting the location of the proposed borehole. If in disagreement, please submit documentation. Based on the latest Google Earth imagery from September 30, 2014, NMOCD recommends that the proposed soil bore location be relocated to the north of the tank battery.
- For each sample location, at least 2 depths (depth obtained permissible levels and depth maintained at least 5 ft. further in depth) must be submitted for laboratory analyses of BTEX, TPH extended, and chlorides. All laboratory analyses must have accompanying field data.
- Please be advised that soil bore logs need to be included in the subsequent delineation report. Also, all sample locations need to be demarcated with GPS coordinates on an appropriately scaled map.

Please confirm or inform for clarification.

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: Andrew Parker [mailto:andrew@rthicksconsult.com]

Sent: Wednesday, December 27, 2017 5:58 PM **To:** Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Cc: taylorp@pride-energy.com; mattp@pride-energy.com; Randall Hicks <r@rthicksconsult.com>; agroves@slo.state.nm.us; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Subject: RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Ms. Yu:

Attached is a revised characterization plan for the above referenced site. A few items were clarified:

- Differentiation between NM 87 State #001 tank battery (1RP-4625) and NM 87 State #001 (1RP-4624) wellhead.
- Added a trench sampling point in the depression ("playa") west-northwest of the tank battery per discussions with Ms. Groves (SLO).

The characterization plan for NM 87 State 001 (wellhead; 1RP-4624) will be submitted under a separate workplan. We plan to perform sampling on Jan 8th. I will email NMOCD/SLO 48-hours in advanced.

Andrew Parker R.T. Hicks Consultants Durango Field Office 970-570-9535

From: Andrew Parker [mailto:andrew@rthicksconsult.com]

Sent: Thursday, December 14, 2017 10:00 AM

To: 'Olivia.yu@state.nm.us'

Cc: 'taylorp@pride-energy.com'; 'mattp@pride-energy.com'; Randall Hicks (<u>r@rthicksconsult.com</u>);

'agroves@slo.state.nm.us'; 'bradford.billings@state.nm.us'

Subject: Pride Energy NM 83 State #001 Charactrization Plan (1RP-4625)

Ms. Yu:

On the behalf of Pride Energy, attached is the characterization plan for the above referenced location. We elected to characterize the 2017 release along with a historic release that occurred sometime between 1996 and 2003 per review of aerial photographs. The trench sample location showed evidence of the historic release at 12-feet below ground surface and is discussed further in the attached workplan.

I would like to conduct the field work mid-January. Please contact me at 970-570-9535 with any questions.

Andrew Parker R.T. Hicks Consultants Durango Field Office