

**From:** Tucker, Shelly  
**To:** [Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com)  
**Cc:** [Raaj.Patel@ghd.com](mailto:Raaj.Patel@ghd.com); [Al Garcia](#); [Jonathan Pennington](#); [Mann, Ryan](#); [Billings, Bradford, EMNRD](#); [Hernandez, Christina, EMNRD](#); [Yu, Olivia, EMNRD](#)  
**Subject:** Re: [EXTERNAL] RE: 2018 Work Plan for Wyatt Phillips - 1RP-4825  
**Date:** Monday, September 17, 2018 2:45:22 PM

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## BLM concurs with NMOCD stipulations and approval.

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

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

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

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 a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they 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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**NOTE: LPC Timing Stipulations - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).**

On Wed, Sep 12, 2018 at 9:45 AM [Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com) <[Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com)> wrote:

Shelly,

Please let me know if you have any concerns or need any additional information.

Take care,

Scott

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**From:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Sent:** Wednesday, September 12, 2018 9:55 AM  
**To:** Scott Foord <[Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com)>; 'stucker@blm.gov' <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Raaj Patel <[Raaj.Patel@ghd.com](mailto:Raaj.Patel@ghd.com)>; Al Garcia <[Al.Garcia@nblenergy.com](mailto:Al.Garcia@nblenergy.com)>; Jonathan Pennington <[Jonathan.Pennington@nblenergy.com](mailto:Jonathan.Pennington@nblenergy.com)>; Ryan Mann ([rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)) <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>  
**Subject:** RE: 2018 Work Plan for Wyatt Phillips - 1RP-4825

Good morning Scott:

Thank you for the summary regarding the revised remediation plan for 1RP-4825. One point of clarification: for this release location, mineral ownership is Federal, not State. Please contact BLM to determine whether additional concerns or stipulations are necessary as well as for approval. BLM may also have specialists, who could provide recommendations on appropriate revegetation strategies.

Thanks,

Olivia

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**From:** [Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com) <[Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com)>  
**Sent:** Tuesday, September 11, 2018 9:51 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** [Raaj.Patel@ghd.com](mailto:Raaj.Patel@ghd.com); Al Garcia <[Al.Garcia@nblenergy.com](mailto:Al.Garcia@nblenergy.com)>; Jonathan Pennington <[Jonathan.Pennington@nblenergy.com](mailto:Jonathan.Pennington@nblenergy.com)>; Ryan Mann ([rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)) <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>  
**Subject:** RE: 2018 Work Plan for Wyatt Phillips - 1RP-4825

Olivia,

Thank you for taking the time to meet with us the other day regarding this work plan and the additional Southwest Royalties, Inc. sites.

Per our discussion, NMOCD and NMSLO agreed to approve our revised work plan and to allow soil blending at the Wyatt Phillips Site (1RP-4825) with the following stipulations:

- Impacted soils above 600 mg/kg for chloride will be excavated to depth (estimated up to 8 ft bgs).
- Impacted soils above 600 mg/kg chloride will be blended with non-impacted soil from the site and composite sampled every 50 cubic yards for laboratory analysis of chloride and TPH.
- Confirmation soil samples will be collected from the bottom of the excavation and analyzed for chloride and TPH.
- Blended soil with chloride and TPH concentrations below permissible levels will be utilized to backfill the excavation.
- No liner will be required within the excavation.
- Confirmation soil samples will be collected from the side walls of the excavation to verify permissible levels have been achieved laterally.
- Regional soil experts will be contacted and utilized to determine proper soil amendments to promote re-growth within the remediated area.
- Areas for deferral will be demarcated with detailed drawings and a scaled map.

Please let me know if I missed anything.

Thanks,

Scott

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**From:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Sent:** Tuesday, August 28, 2018 10:03 AM  
**To:** Jonathan Pennington <[Jonathan.Pennington@nblenergy.com](mailto:Jonathan.Pennington@nblenergy.com)>  
**Cc:** Scott Foord <[Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com)>; Raaj Patel <[Raaj.Patel@ghd.com](mailto:Raaj.Patel@ghd.com)>; Al Garcia <[Al.Garcia@nblenergy.com](mailto:Al.Garcia@nblenergy.com)>  
**Subject:** RE: 2018 Work Plan for Wyatt Phillips - 1RP-4825

Good morning Mr. Pennington:

No subsequent information has been submitted to NMOCD, regarding 1RP-4825, since the last communication on January 2, 2018. Therefore, soil bore logs were not submitted or received. Pardon if I missed them in my inbox.

NMOCD will approve of the revised remediation plan for 1RP-4825 with the below stipulations:

Please be advised

- Except for specific conditions, NMOCD does not allow blending for chloride-impacted soil. For this release, the areas represented by Sample locations A, B, C, and G have chloride levels above permissible levels at surface up to 4 ft. bgs. These areas will require a 4 ft. excavation and minimal 20 mil liner, if applicable. Lined areas will still require sidewall confirmation samples, but not samples from the base of the excavation.
- Based on the delineation data from October 27, 2017, some sections of the release area (D, E, F, J) may not necessitate soil excavation or limited excavation (H, I). However, if subsequent confirmation sampling at these areas indicate that field titration tests demonstrate chloride values around 1000 mg/kg, stockpiling and blending soil may be permissible on the condition that blended soil must be laboratory tested every 50 cubic yards.
- Areas for deferral until time of abandonment, retrofit, or inactivity must have dimensions demarcated with GPS coordinates on a scaled map.

Please confirm or inform for clarifications.

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:** Jonathan Pennington <[Jonathan.Pennington@nblenergy.com](mailto:Jonathan.Pennington@nblenergy.com)>  
**Sent:** Thursday, August 16, 2018 4:52 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** [Scott.Foord@ghd.com](mailto:Scott.Foord@ghd.com); [Raaj.Patel@ghd.com](mailto:Raaj.Patel@ghd.com); Al Garcia <[Al.Garcia@nblenergy.com](mailto:Al.Garcia@nblenergy.com)>  
**Subject:** 2018 Work Plan for Wyatt Phillips - 1RP-4825

Dear Ms. Yu,

Effective January 31, 2018, Southwest Royalties, Inc. was transferred from NBL Permian LLC (a subsidiary of

Noble Energy, Inc.) to Desert Permian LLC. As part of the transfer agreement, Noble agreed to continue

performing site delineation and remediation activities related to release site 1RP-4825. Therefore, Noble

Energy, Inc. respectfully submits the enclosed Revised Remediation Work Plan for 1RP-4825.

Please contact me if you have any questions.

Thanks,

**Jonathan Pennington**

Environmental Coordinator

EHSR

1001 Noble Energy Way, Houston, TX 77070  
Main: 281.872.3100 | Direct: 281.874.6072 | Cell: 832.427.7652  
[Jonathan.Pennington@nblenergy.com](mailto:Jonathan.Pennington@nblenergy.com) | [www.nblenergy.com](http://www.nblenergy.com)



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