

From: [Hernandez, Christina, EMNRD](#)
To: ["Cliff Brunson"](#); [Yu, Olivia, EMNRD](#); ["Shelly Tucker"](#)
Cc: ["Becky Haskell"](#); [DeAnn Grant](#); ["Dakota Neel"](#); ["Sheldon Hitchcock"](#); ["Ken Swinney"](#); ["Jennifer Gilkey"](#); ["Kathy Purvis"](#)
Subject: RE: COG Lusk Deep Unit A #019 SWD (1RP-5098) - Delineation Workplan
Date: Monday, October 1, 2018 2:37:00 PM
Attachments: [Delineation Workplan Lusk Deep Unit A #019 SWD \(6-14-18\).pdf](#)

Dear Mr. Brunson:

The submitted report for 1RP-5098 does not contain all the site assessment/release characterization requirements as per 19.15.29.11 NMAC. However, to facilitate resolution, NMOCD will grant approval for delineation completion for 1RP-5116, on the conditions that SP2 and SP3 be excavated to 9' and no liner be used. Utilization of liners now necessitates a variance submission that must include justification and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health and the environment. Please be advised to meet all the requirements for 19.15.29.11 NMAC along with the closure requirements under 19.15.29.12 NMAC.

BLM approval required. BLM may have additional concerns or stipulations. Per 19.15.29.13E, BLM's regulations supersede NMOCD's.

Thanks,
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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: Cliff Brunson <cbrunson@bbcinternational.com>
Sent: Wednesday, September 5, 2018 3:17 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Shelly Tucker' <stucker@blm.gov>
Cc: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; 'Becky Haskell' <rhaskell@concho.com>; DeAnn Grant <agrants@concho.com>; 'Dakota Neel' <DNeel2@concho.com>; 'Sheldon Hitchcock' <SLHitchcock@concho.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Jennifer Gilkey' <jgilkey@bbcinternational.com>; 'Kathy Purvis'

<kathy@bbcinternational.com>

Subject: COG Lusk Deep Unit A #019 SWD (1RP-5098) - Delineation Workplan

Olivia and Shelly,

Please find the attached Delineation Workplan and remediation proposal for the COG Lusk Deep Unit A #019 SWD (1RP-5098). Page 5 (Remediation) of the C-141 is attached at the end of the submitted plan. COG is requesting that you review this plan and is looking forward to the OCD's and BLM's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS
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