

From: [Andrew Parker](#)
To: [Yu, Olivia, EMNRD](#); "[Mann, Ryan](#)"
Cc: [Billings, Bradford, EMNRD](#); mattp@pride-energy.com; "[Randall Hicks](#)"
Subject: [EXT] RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624
Date: Tuesday, October 23, 2018 10:20:00 AM
Attachments: Wellhead - Resonse to NMOCD Comments Oct 4 2018.pdf

Ms. Yu:

Attached is our response to the email below. As with the Tank Battery location, further vertical characterization at sample locations that show constituents below 19.15.29.13.E. Table 1 limits where analytical testing at 0.5 ft below ground surface – where very hard caliche was encountered - shows detections below laboratory detection limits or where chloride is approximately half of the chloride limit of 600 mg/kg (for areas no longer “in-use) will show, with high probability, that soil concentrations will remain below Table 1 limits. Furthermore, nearby soil borings show that the hard caliche exists to at least 7 to 10 feet below ground surface. Vertical downward migration of chloride and hydrocarbons through this hard caliche where chloride is approximately 250 mg/kg is highly unlikely to impact groundwater that is approximately 70-feet below ground surface.

I will be sending you and Mr. Mann an invite to meet at the site for next Monday (October 23) to discuss proposed actions. If you cannot make it I would like to schedule a meeting with you to discuss remediation at the location in your office sometime later that week.

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

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, October 04, 2018 7:21 AM
To: Andrew Parker; 'Mann, Ryan'
Cc: Billings, Bradford, EMNRD; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; 'Randall Hicks'
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Messrs. Parker & Pride:

While an actual ‘approved work plan’ was not explicitly stated, please note that the year-long back and forth correspondence is to ensure that complete release characterization is conducted before an appropriate remediation plan is in place to resolve 1RP-4624.

Please be advised that NMOCD applies 19.15.29 NMAC in its entirety. Therefore, please note that 19.15.29.12C(2) states

(2) The responsible party shall restore the impacted surface area of a release occurring on a developed well pad, central tank battery, drilling site, compressor site or other exploration, development, production or storage sites to meet the standards of Table I of 19.15.29.12 NMAC or other applicable remediation standards and restore and reclaim the area pursuant to 19.15.29.13 NMAC.

Which includes this section:

19.15.29.13A: **A.** The responsible party must substantially restore the impacted surface areas to the condition that existed prior to the release

AND

19.15.29.13E

E. The surface restoration, reclamation and re-vegetation obligations imposed by federal or state agencies or tribes on lands managed or owned by those agencies supersede these provisions and govern the obligations of any responsible party subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.

NMOCD Hobbs will defer to NMOCD Santa Fe to determine whether pre- or post- August 12, 2018 remediation levels are applicable for this UNKNOWN release volume, in which case, 19.15.29.11.5(c).

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 <andrew@rthicksconsult.com>
Sent: Thursday, August 30, 2018 5:04 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Mann, Ryan' <rmann@slo.state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Attached is the remediation plan for the above referenced wellhead site. Please note I will be out of the office from Aug. 31st through September 15th.

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

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, July 26, 2018 9:35 AM
To: Andrew Parker; Mann, Ryan
Cc: Billings, Bradford, EMNRD; mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; Randall Hicks
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Good morning Mr. Parker:

The request for deferral for proposed remediation is denied for 1RP-4624. The historic and most recent release on this location abide by current regulation. Vertical delineation on the well pad- North and Southeast locations- must be completed before evaluation of proposed remediation.

NMSLO may have additional concerns and stipulations.

Thanks,
Olivia

From: Andrew Parker <andrew@rthicksconsult.com>
Sent: Tuesday, June 26, 2018 5:28 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mnaranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; Randall Hicks <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Attached is the characterization and remediation plan for Pride Energy's NM 87 State 001 (Wellhead) release. Please note that we ask NMOCD for a temporary deferment to the proposed restoration and remediation plan. The purpose of the request is to postpone remediation/restoration design until the final ruling of NMOCD's proposed application to repeal and replace Rule 19.15.29 NMAC (the Rule). The final ruling is expected to be delivered by the first week of August 2018.

Thank you,

Andrew Parker
R.T. Hicks Consultants

Durango Field Office
970-570-9535

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:51 PM
To: Olivia.yu@state.nm.us
Cc: bradford.billings@state.nm.us; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Please consider this the 48-hour advanced notice to perform characterization as outlined in our March 28, 2018 report submitted to Pride Energy with a copy to NMOCD. We plan to arrive at the wellhead location late afternoon on April 2, 2018, after completion of characterization at the tank battery location. We welcome NMOCD to observe the characterization and we are prepared to answer any questions NMOCD may have. Any person on-site will be required to have steel toe boots, ear protection, and hardhat as PPE.

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

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:29 PM
To: mattp@pride-energy.com; taylorp@pride-energy.com
Cc: bradford.billings@state.nm.us; mnanranjo@slo.state.nm.us; Olivia.yu@state.nm.us
Subject: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Mr. Pride:

Attached are the results of the first characterization plan and the proposed activities for the second characterization. Please note that NMAC 19.15.29 does not require NMOCD approval of characterization plans. After reviewing second characterization results, we will determine the best approach on whether to

1. Perform corrective actions under the current regulation, or
2. Ask for a variance using the proposed cleanup criteria levels as a guidance as discussed in the attached plan.

We plan on performing the second characterization on the afternoon of April 2, 2018. A notice to NMOCD will follow this email.

Per NMAC 19.15.29, the next formal submission to NMOCD is either a remediation (correction action) or closure plan – at which time NMOCD can either deny or approval the plan. The type of submission and path forward will be based on data collected during the characterization using

standards and regulations in-place at the time. A formal variance may be requested at the time of formal submission to NMOCD.

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

R. T. HICKS CONSULTANTS, LTD.

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Artesia ▲ Carlsbad ▲ Durango ▲ Midland

October 23, 2018

Olivia Yu
NMOCD District 1
1625 N. French Dr.
Hobbs, NM 88240

RE: **Response to NMOCD's October 4th and 7th, 2018 email**
1RP-4624, Pride Energy Company
NM 87 State #001 (**Wellhead**)
API#: 30-025-23655
Section 33-14S-34E: Unit K, Lea County, New Mexico
Site Characterization Report and Remediation Plan

Ms. Yu:

The purpose of this response is to clarify 1) our proposed remediation plan in our August 30th, 2018 submission and 2) provide our understanding of 19.15.29 NMAC.

Per 19.15.29.11.A.(5).(b) the horizontal and vertical characterization of releases will be delineated to Table 1 of 19.15.29.12 constituents, which also includes closure criteria "limits". Characterization will not be considered complete until soil sampling shows the constituents of concern are below Table 1 limits.

Furthermore, 19.15.29 NMAC refers to remediation as:

1. Restoration – for areas "in-use"
2. Reclamation – for areas "no longer in-use"

All surfaces shall be remediated in accordance with 19.15.29.13. In addition, surface soils within the areas that are "in-use" shall be restored and meet the closure criteria limits listed in Table 1. Surface soils that are "no longer in-use" shall be reclaimed to Table 1 limits and the upper 4-feet of soil shall contain less than 600 mg/kg chloride.

Per 19.15.29.16, Responsible parties without approved plans must submit a corrective action/remediation plan within 90 days of August 14, 2018. It is our understanding that all plans submitted after August 14, 2018 will comply with the recently revised 19.15.29.

Exhibit 1 shows chloride and TPH concentrations in mg/kg. Sample depths showing a range were averaged from discrete samples. Discrete sample depths are noted otherwise. Very hard caliche exists throughout the area at 0.5 feet except at North Pad, which is likely at the southern boundary of the former reserve pit area. During the January 2018 backhoe trench investigation 0.5 feet depth was the depth that the backhoe encountered refusal. We returned to the location in April 2018 and drilled two boreholes for extended vertical delineation of SE Pad and SW Pasture. Chloride above 600 mg/kg at SE Pad dictated the decision to delineate vertically. SW Pasture was delineated at the request of the State Land

October 23, 2018

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Office. The decision to cease vertical delineation at 6 to 10 feet below ground surface was governed by field chloride titrations below Table 1 limits of 10,000 mg/kg chloride for areas “in-use”.

Pride Energy acquired the location in February 2007 and has no survey plats in their files. The well was first spudded in December 1970. No site specific survey exists in NMOCD’s online files. Mr. Mann with the State Land Office has no survey plats showing lease extents. Therefore, we used a 1971 aerial photograph (Exhibit 2) to locate the well pad extents and define areas “in-use”.

As shown on Exhibit 1 and 2, the pink outline defines the “in-use” area based upon historic aerial photos, a current aerial photo, and site reconnaissance.

As discussed in our August 2018 report, and summarized below with clarification, we propose:

- For areas “no longer in-use” – the two areas the State Land Office identified as areas-of-concern, SE Pasture and SW Pasture, are below Table 1 limits. We will continue to monitor for natural reclamation of surface soils to ensure surface re-vegetation continues to develop. Per 19.15.29.13.E, we will work with State Land Office to ensure the surface is restored according to the State Land Office rules and regulations.
- For areas “in-use” –sample locations meet Table 1 limits and meet the requirements of 19.15.29.13.A-C. Upon plug and abandonment of the wellhead the location will be reclaimed per 19.15.29.13.D-E.

Please contact me at 970-570-9535 with any questions or comments.

Sincerely,
R.T. Hicks Consultants, Ltd.





Andrew Parker
Project Scientist

Copy: Hobbs NMOCD office – Oliva Yu (Olivia.Yu@state.nm.us)
NMOCD – Brad Billings (bradford.billings@state.nm.us)
NM SLO – Ryan Mann (rmann@slo.state.nm.us)

Legend

Site Extents

Site Extents

-  Production Pad ("in-use")
-  Former Reserve Pit

Depth (ft)

-  Historic Release

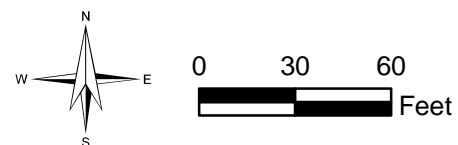
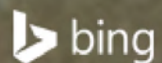
North Pad			
	CI	TPH Ext.	TPH
2 ft	1,500	ND	ND
10 ft	1,600	ND	ND

SW Pad			
	CI	TPH Ext.	TPH
0 - 4 ft	73	ND	ND
6 ft	ND	NS	NS

SE Pad			
	CI	TPH Ext.	TPH
0 - 4 ft	3,467	ND	ND
6 - 10 ft	1,100	ND	ND

SW Pasture			
	CI	TPH Ext.	TPH
0.5 ft	ND	ND	ND
6 ft	ND	NS	NS

SE Pasture			
	CI	TPH Ext.	TPH
2 ft	ND	ND	ND



R.T. Hicks Consultants, Ltd
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Chloride and TPH Delineation
(Jan/April 2018)

Pride Energy Company
NM 87 State #001 (Wellhead)

Exhibit 1

October 2018

