

R. T. HICKS CONSULTANTS, LTD.

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✱ Durango, CO ✱ Carlsbad-Hobbs, NM ✱

March 23, 2020

NMOCD District 1
District 1 - HOBBS
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Tracking #: NRM2000358734
Response to NMOCD Denial of Closure
Wool Head 20 State Com 3 Battery

NMOCD:

R.T. Hicks Consultants submits this response to NMOCD's denial on the behalf of Advance Energy Partners Hat Mesa.

NMOCD's denial of the closure report states:

The OCD has denied the submitted Closure Report for incident nRM2000358734 for the following reason:

- *The report is missing a sampling diagram representing point(s) where samples were collected. It is unclear if the "ramp" samples are to be considered base samples or sidewall samples. If only 5 base samples were collected, more sampling will be needed to approve closure for this site.*

This response includes:

- An updated site map showing
 - the area of saturation from the release
 - the area of surface oil spray
- Revised base sampling diagram to demonstrate the division of Grid S5 into a south and north grid. A total of 6 base composite samples were collected for confirmation sampling.
- Wall sampling diagram
- Additional explanation of 5-point composite sample spacing
- Clarification of base and wall sample locations in analytical summary table.

Plate A shows the revised site map and identifies two areas of interest: 1) the area of saturation and 2) area of oil spray. The area of saturation was limited to the production pad and is where pooling was observed. The production pad berm prevented the release from flowing off-site into pastureland. High winds during the release caused an oil spray to form on the ground surface and vegetation as shown in the release extent north of the production pad.

Plate B shows the revised base sample grid diagram. Grid S5, which is within the area of pooling, is divided into two 5-point composite grids, S5 South and S5 North.

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Sampling grids within the area of oil spray (S1 through S4) are larger as the area was limited to impact from oil spray only on the surface and no saturation into subsurface soils was observed during initial release response. The area was surface scraped including the removal of the upper foot of soil.

A 5-point composite base sample was collected from each sample grid for confirmation sampling. Five-point composite sample points were evenly spaced within each sample grid to obtain a representative sample of the area (Figure 1, below).

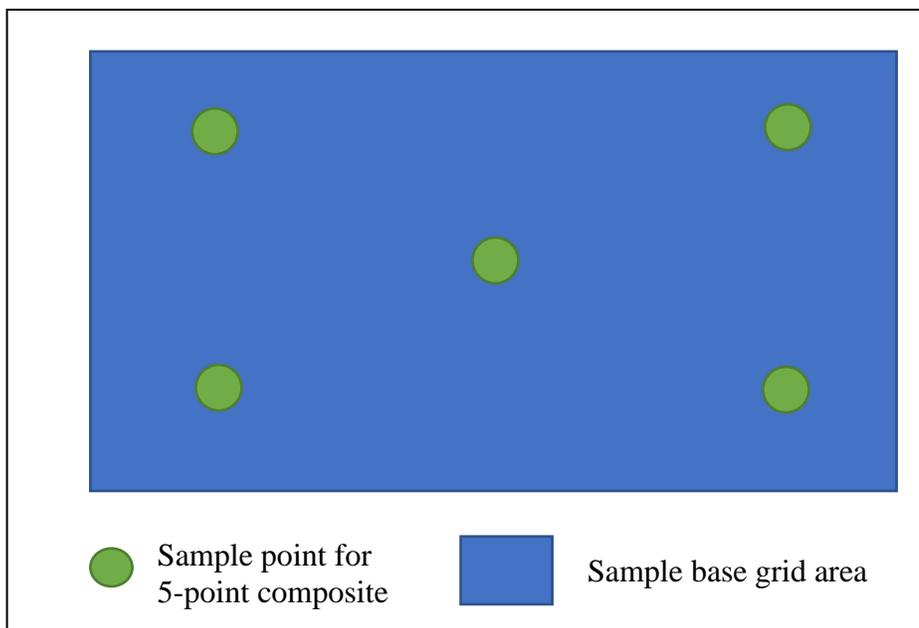


Figure 1: Example of 5-point sample grid for base composite sampling.

Plate C shows the wall sampling diagram. Five-point composite soil samples were collected along the walls of the sample grid. Sample points for the composite wall sample were evenly distributed along the wall to obtain a representative 5-point composite sample. Samples were collected from the surface to 4-feet or excavation base depth, whichever was less.

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Table 1, Summary of Analytical, was revised to show whether the sample location was a base or wall sample. Sample locations are shown on Plates B and C, bases and wall, respectively.

Please contact me with any questions at andrew@rthicksconsult.com or 970-570-9535.

Sincerely,
R.T. Hicks Consultants, Ltd.



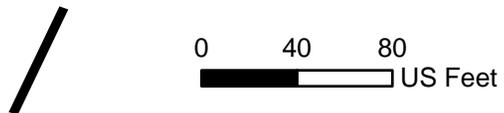
Andrew Parker
Sr. Env. Specialist

Copy: David Harwell (DHarwell@advanceenergypartners.com);
Advance Energy Partners Hat Mesa, LLC

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WOOL HEAD 20
STATE #003

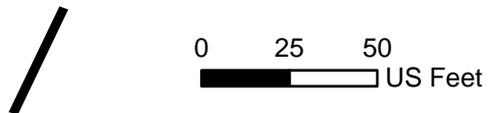
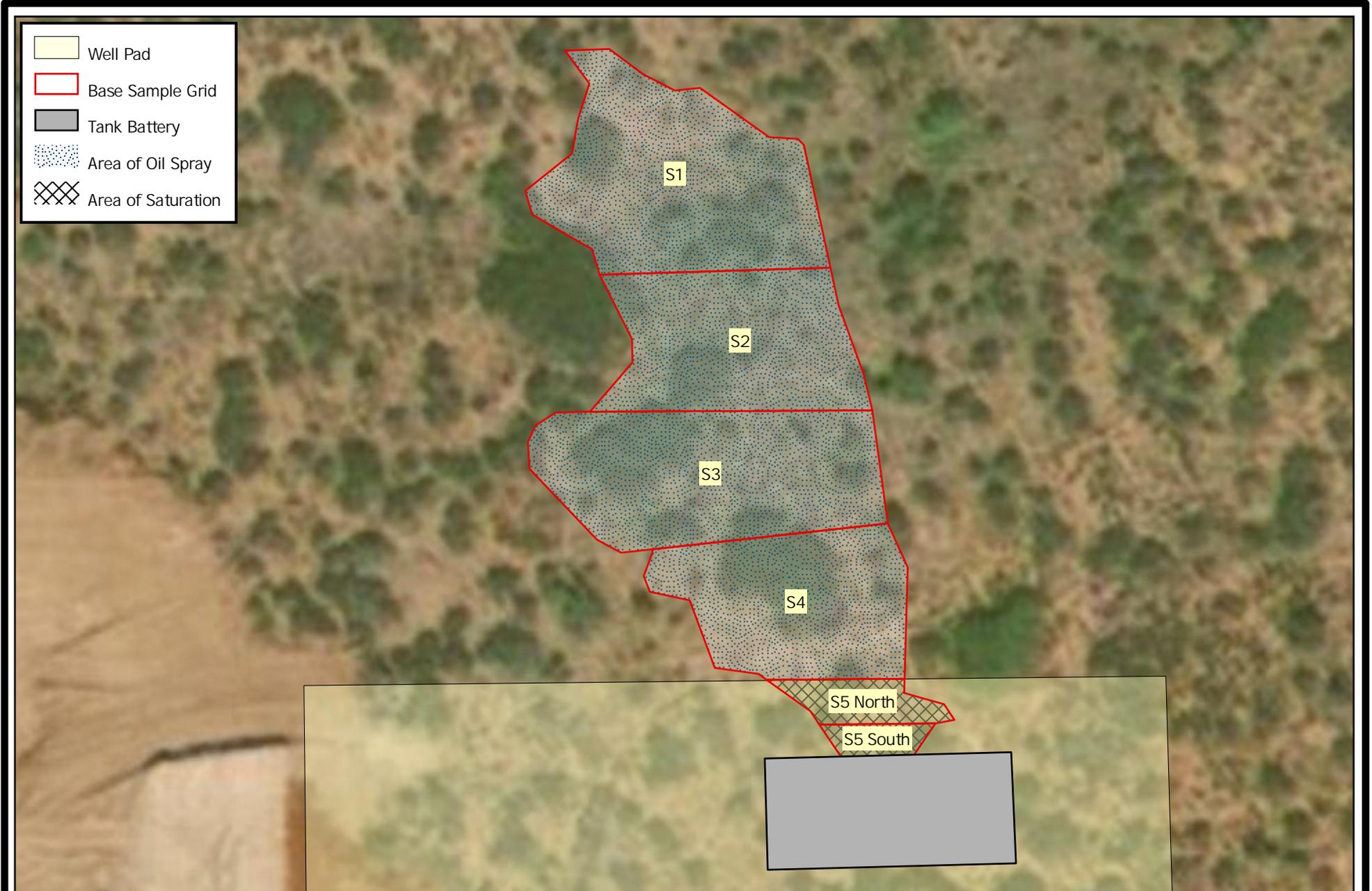


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Site Map
(Revised 03/23/2020)
Advance Energy Partners Hat Mesa
NRM2000358734 - Wool Head 20 State Com #3 Battery

Plate A
03/23/2020

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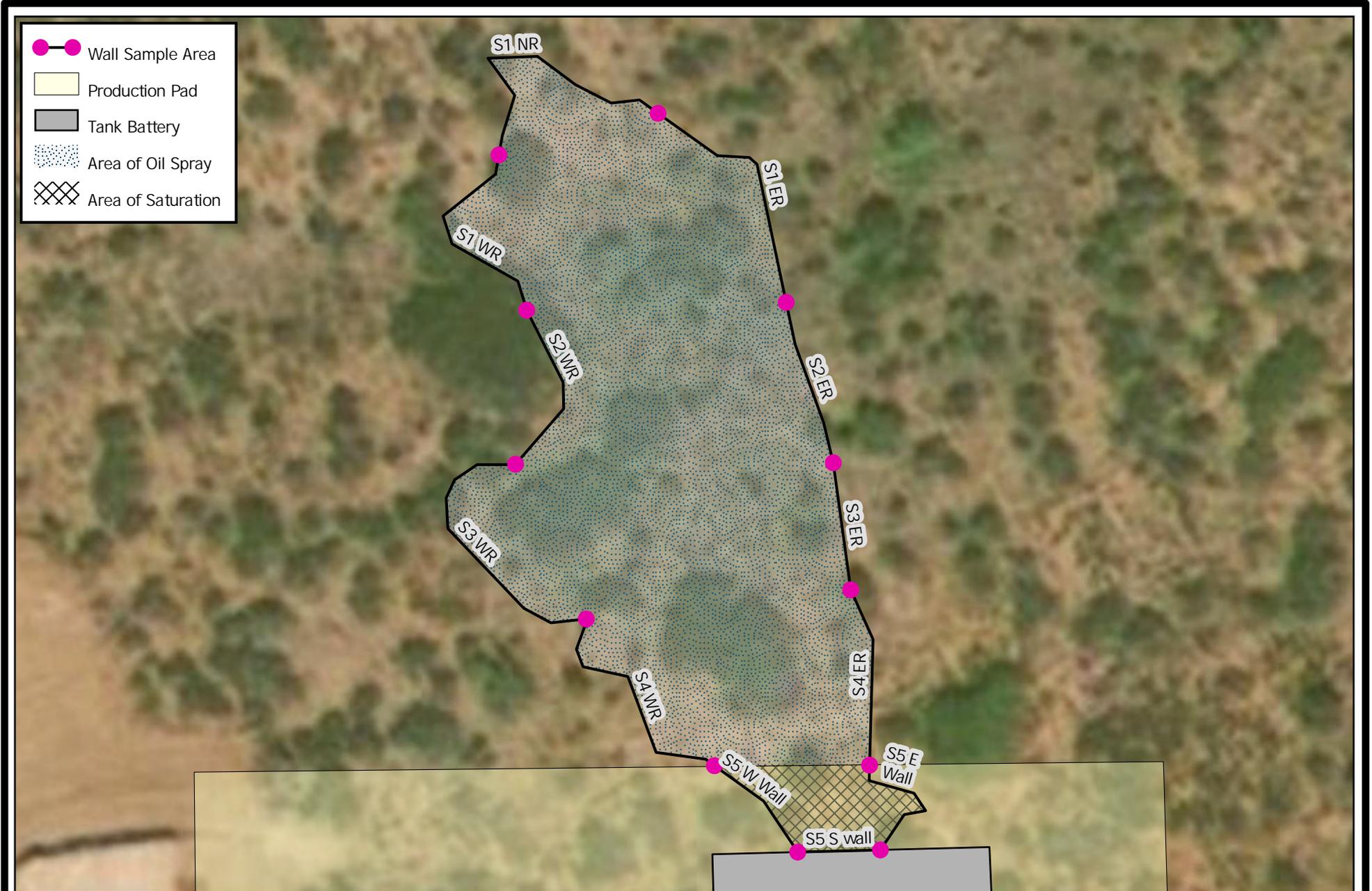


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Base Sample Grid
(Revised 03/23/2020)
Advance Energy Partners Hat Mesa
NRM2000358734 - Wool Head 20 State Com #3 Battery

Plate B
March 23 2020

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Wall Sample Grid
(Revised 03/23/2020)
Advance Energy Partners Hat Mesa
NRM2000358734 - Wool Head 20 State Com #3 Battery

Plate C
March 23 2020

March 23 2020
(Revised)

Table 2
Summary of Analytical

Wool Head 20 State Com 3 Battery
Advance Energy Partners Hat Mesa

Sample ID	Date	Location (Base/Wall)	Discrete Depth (Feet)	Top Depth (Feet)	Bottom Depth (Feet)	Chloride (PPM)	GRO+DRO (PPM)	TPH Ext. (PPM)	Benzene (PPM)	BTEX (PPM)	Comments
NMOCD Closure Criteria											
0 - 4 feet & "not in-use"						600	--	2,500	10	50	
> 4 ft or "in-use"						20,000	1,000	2,500	10	50	
Confirmation Sampling											
S1 Base	10/21/2019	Base		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S1 ER	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S1 NR	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S1 WR	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S2 Base	10/21/2019	Base	1.0			<16	<20	<30	< 0.05	<0.3	
S2 ER	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S2 WR	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S3 Base	10/21/2019	Base	1.0			16	<20	<30	< 0.05	<0.3	
S3 ER	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S3 WR	10/21/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S4 Base	10/23/2019	Base	1.0			16	<20	<30	<0.05	<0.30	
S4 ER	10/23/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S4 WR	10/23/2019	Wall		0.0	1.0	<16	<20	<30	<0.05	<0.30	
S5 North Base	10/25/2019	Base	4.5			48	<128	<147.3	<0.05	<0.30	
S5 South Base	11/4/2019	Base	4.5			16	<20	<30	<0.05	<0.30	
(S5 Base Averaged)		Base	4.5			32	<74	<88.65	<0.05	<0.3	
S5 East Wall	11/4/2019	Wall		0.0	4.0	16	<20	<30	<0.05	<0.30	
S5 West Wall	11/4/2019	Wall		0.0	4.0	32	<20	<30	<0.05	<0.30	
S5 South Wall	11/4/2019	Wall		0.0	4.0	48	<20	<30	<0.05	<0.30	Below Containment
S5 South Wall Base	11/4/2019	Base	4.5			16	<20	<30	<0.05	<0.30	Below Containment

Notes:

ER East Ramp (Wall)
WR West Ramp (Wall)
NR North Ramp (Wall)

andrew@rthicksconsult.com

From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Sent: Thursday, February 27, 2020 4:52 PM
To: andrew@rthicksconsult.com
Cc: Venegas, Victoria, EMNRD; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD
Subject: Closure Denial - nRM2000358734
Attachments: (C-141 Closure Denied) -nRM2000358734.pdf

Flag Status: Flagged

Andrew,

The OCD has denied the submitted Closure Report for incident nRM2000358734 for the following reason:

- The report is missing a sampling diagram representing point(s) where samples were collected. It is unclear if the "ramp" samples are to be considered base samples or sidewall samples.. If only 5 base samples were collected, more sampling will be needed to approve closure for this site.

The Denied C-141 can be found in the online image database under the incident #. Please review and make the required corrections prior to submitting through the fee portal.

Please let me know if you have any questions.

Thanks,

Cristina Eads
Environmental Bureau
EMNRD – Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505.476.3084
email: Cristina.Eads@state.nm.us

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 groundwater, 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, or local laws and/or regulations.