

**From:** [Kristin Pope](#)  
**To:** [Patterson, Heather, EMNRD](#)  
**Cc:** [djglass@blm.gov](mailto:djglass@blm.gov); [gboans@jdmii.com](mailto:gboans@jdmii.com); [Randy Hicks](#); [Chace Walls](#)  
**Subject:** RE: initial C-141: Murchison - War Horse #3H release  
**Date:** Friday, September 11, 2015 12:22:31 PM  
**Attachments:** completeWar Horse 3H C-144\_NewRule10 21 13.pdf

---

Ms. Patterson,

Please find the attached C-144 application for a temporary pit at the location submitted to District II in October 2013. This application includes a discussion on local groundwater and an inventory of the nearest wells and water courses, as well as several site maps. Based on my observations and discussion with the operator, the information presented in the C-144 application is still applicable to the current site conditions. Using the data from the C-144 and ranking criteria found in NMOCD's 1993 spill guidelines, the site warrants a total ranking score of 0:

GW = 164 ft	0
Surface water >1000 ft	0
Wells >1000 ft	0
<b>Total Ranking Score</b>	<b>0</b>

Murchison responded immediately to the release by removing standing fluid and the affected soils and replaced them with clean pad material to bring the location back into full service. After this work was complete, I returned to the site to test the soil below the pad. As stated in the initial C-141 letter, I performed chloride field tests on subsoils where I observed accumulation during the release. The two locations at 2 inches below the surface yielded 121 mg/kg Cl and 112 mg/kg Cl respectively. With chloride concentrations so low, we are confident that all affected material has been excavated and removed and hydrocarbon analyses were unnecessary.

We appreciate your work towards the closure of this file.

**Kristin Pope**  
**R.T. Hicks Consultants**  
**Carlsbad Field Office**  
**575.302.6755**

---

**From:** Patterson, Heather, EMNRD [mailto:Heather.Patterson@state.nm.us]  
**Sent:** Friday, July 24, 2015 7:15 AM  
**To:** Kristin Pope  
**Subject:** RE: initial C-141: Murchison - War Horse #3H release

Kristin,

I need your site ranking, site map, and analytical results showing all contaminated soils were removed.

Thanks,

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

---

**From:** Kristin Pope [<mailto:kristin@rthicksconsult.com>]  
**Sent:** Friday, July 17, 2015 12:04 PM  
**To:** Patterson, Heather, EMNRD  
**Cc:** 'Jim Burnett'; [jamos@blm.gov](mailto:jamos@blm.gov); 'Chace Walls'; 'Randy Hicks'; [gboans@jdmii.com](mailto:gboans@jdmii.com); Bratcher, Mike, EMNRD  
**Subject:** RE: initial C-141: Murchison - War Horse #3H release

Heather,

Please find the attached final C-141 submission for the War Horse #3 release. This includes the disposal manifest ticket; please let me know if you need any other documentation for closure. Thanks.

Kristin Pope  
R.T. Hicks Consultants  
Carlsbad Field Office  
575.302.6755

---

**From:** Patterson, Heather, EMNRD [<mailto:Heather.Patterson@state.nm.us>]  
**Sent:** Wednesday, July 08, 2015 9:27 AM  
**To:** Kristin Pope  
**Cc:** 'Jim Burnett'; [jamos@blm.gov](mailto:jamos@blm.gov); Chace Walls; Randy Hicks; [gboans@jdmii.com](mailto:gboans@jdmii.com); Bratcher, Mike, EMNRD  
**Subject:** RE: initial C-141: Murchison - War Horse #3H release

Kristin,

The initial C-141 for the Murchison War Horse #3H release has been accepted for record and assigned the OCD tracking number 2RP-3093.

Your proposal to dispose of excavated soils from this release into nearby temporary drilling pits is denied as per NMAC 19.15.17.12.B. (1) which states, "Only fluids or mineral solids generated or used during the drilling, completion or workover process may be discharged into a temporary pit."

In addition, NMAC 19.15.17.13 states several times that pit waste is to be stabilized with "soil or other non-waste material."

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

---

**From:** Kristin Pope [<mailto:kristin@rthicksconsult.com>]  
**Sent:** Friday, July 03, 2015 7:32 AM  
**To:** Patterson, Heather, EMNRD  
**Cc:** 'Jim Burnett'; [jamos@blm.gov](mailto:jamos@blm.gov); Chace Walls; Randy Hicks; [gboans@jdmii.com](mailto:gboans@jdmii.com)  
**Subject:** initial C-141: Murchison - War Horse #3H release

Heather,

On behalf of Murchison, please find the attached initial C-141 submission for the War Horse #3H release that occurred on June 19<sup>th</sup>. I will drop a paper copy in the mail.

Thanks and have a good holiday weekend.

Kristin Pope  
R.T. Hicks Consultants  
Carlsbad Field Office  
575.302.6755