

From: [Weaver, Crystal, EMNRD](#)
To: [Sheldon Hitchcock](#); [Price, Henryetta](#); stucker@blm.gov; [Bratcher, Mike, EMNRD](#)
Cc: [Dakota Neel](#); [Rebecca Haskell](#)
Subject: RE: Patron 23 Federal #4H (1/28/17) Proposed Liner
Date: Thursday, February 15, 2018 9:00:00 AM

Hey Sheldon,

I want to start out by saying COG does a great job cross checking things on their C-141s and being timely etc. and OCD thanks you all for that.

However, I wanted to respond back to you on what you sent me the other day.

I totally see that both of your environmental contractors had different interpretations of the Chevron Texaco map's trend lines. Which could be an issue and could not be an issue.

However, all I am saying is that OCD would greatly appreciate a more thorough assessment of ground water than just citing one ground water data reference. Or at least mention that other data sources were checked and then give a reason for why the other sources were not referenceable, i.e. "OSE database was checked but no well sites in their system within a _____ meter radius had depth to water documented" or however you all want to write it.

Cause I will be honest with you, I searched OSE' online public GIS map and found a stock well titled C-2371 that cites depth to ground water at 60ft and is less than 2500 meters away from the Patron 23 Federal #4H pad. Now OCD could use that to cite when I look thru the new work plan (2RP-4286) cause to me that is actual documented data whereas a trend map is just a line someone drew based on reference points they had along the way like connect the dots... but what I will say is I was willing to take a step further and factor in elevation and in the case of elevation difference between Patron 23 Federal #4H vs where well C-2371 elevation was on your side. But do you see where I am frustrated. I did all of that work and checked those things. Your contractors should be doing this not me. All I should need to do is fact check them with the data I have or if I don't have access to the data they mention I could call and ask them about their sources etc.

I will repeat I approved this release for closure and I will work on the work plan for 2RP-4286 shortly here after but please keep in mind what I have mentioned here, otherwise OCD may need to start requesting that depth to water for actual site locations be confirmed via a temporary monitor well i.e. bore hole that goes vertical till protectable depth to ground water is reached.

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I am not intending to be difficult, I am only trying to do my best to move OCD forward by asking for better quality work plans and assessment efforts from contractors and operators if possible.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street
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From: Sheldon Hitchcock [mailto:SLHitchcock@concho.com]
Sent: Wednesday, February 14, 2018 8:24 AM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Price, Henryetta <hprice@blm.gov>; stucker@blm.gov; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: RE: Patron 23 Federal #4H (1/28/17) Proposed Liner

Crystal,

Yes both work plans are referencing the 2005 Chevron Texaco Trend map. As far as the minor differences in groundwater depth goes, both releases occurred in Section 14 of 25S 29E. There is a 200' contour line splitting Section 14 so depending on how you judge the map it is reasonable to expect a range in estimation from 190-feet through 225-feet. Based on the best information we have available we know that that both sites have a ranking of 0 and groundwater in this vicinity is in around 200-feet below ground surface. I hope this helps answer your questions. Please let me know if you need anything else.

Thank you,

Sheldon L. Hitchcock
HSE Coordinator
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From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Tuesday, February 13, 2018 12:54 PM

To: Sheldon Hitchcock; Price, Henryetta; stucker@blm.gov; Bratcher, Mike, EMNRD
Cc: Dakota Neel; Rebecca Haskell
Subject: [External] RE: Patron 23 Federal #4H (1/28/17) Proposed Liner

**** External email. Use caution. ****

RE: COG Operating LLC * Patron 23 Federal #4H * 30-015-42451 * 2RP-4096

Hey Sheldon,

I am working on the closure for this one right now and I am also working on the work plan approval for the other release that occurred at this same location on 7/28/17 2RP-4286. I have a quick question on the work plan for this one (2RP-4096) TRC wrote in the work plan that “a reference map utilized by the NMOCD Hobbs District Office” was consulted for the depth to ground water analysis that they did on this project. What map would that be? Is that supposed to be the Chevron Texaco trend map? They say the depth to water (dtw) determination they got from the map was 190’ dtw. Tetra Tech in the other work plan for 2RP-4286 ALSO sites only the Chevron Texaco trend map as their only depth to ground water reference and says the map reads 200’ to 225’ dtw. Why was that trend map the only item referenced? I just really want to stress on how we need to utilize all available depth to water data that we have otherwise OCD may need to start requesting that depth to water for actual site locations be confirmed via a temporary monitor well i.e. bore hole that goes vertical till protectable depth to ground water is reached.

I will approve this release for closure and work on the work plan for 2RP-4286 shortly here after but please keep in mind what I have mentioned here.

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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.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

Crystal Weaver

Environmental Specialist

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From: Sheldon Hitchcock [<mailto:SLHitchcock@concho.com>]
Sent: Tuesday, November 14, 2017 3:47 PM
To: Price, Henryetta <hprice@blm.gov>; stucker@blm.gov; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: Patron 23 Federal #4H (1/28/17) Proposed Liner

Good Afternoon Everyone,

I performed confirmation sampling at the Patron 23 Fed #4H per the approved work plan (copy attached) today. As stated in the work plan I advanced test trenches at T-1 and T-2 and was able to achieve an additional 5-feet of vertical delineation per NMOCD guidelines. However my bottom of excavation samples were still elevated above NMOCD RRAL's. Due to the results of our field analysis and the excavation difficulties imposed by the caliche horizon at this site I would like to propose setting a liner (at a minimum of 4-feet BGS) to encapsulate the remaining chloride impacts and backfilling the excavation. Please let me know what your thoughts are on this or if you have any questions.

Respectfully,

Sheldon L. Hitchcock
HSE Coordinator
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