

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Thursday, May 23, 2019 8:15 AM
To: Davis, Amanda; Bratcher, Mike, EMNRD; Joel Lowry
Cc: Hamlet, Robert, EMNRD; Bustamante, Amalia, EMNRD; Mann, Ryan
Subject: RE: [EXTERNAL] FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

RE: [EXTERNAL] FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

All,
The OCD tracking number for this release event is **2RP-5441**.
Thank you,

Victoria Venegas
EMNRD
OCD-District II
811 S First St. Artesia
NM 88210
Victoria.Venegas@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.

From: Davis, Amanda <Amanda.Davis@dmv.com>
Sent: Tuesday, May 21, 2019 6:55 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Joel Lowry <joel@lowryenvironmental.com>; Jim Amos (jamos@blm.gov) <jamos@blm.gov>
Cc: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Subject: [EXT] RE: [EXTERNAL] FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

Mike,

I have attached a signed C-141 for the Tomb Raider 1 – 12 Federal #718H. Please let me know if I can provide anything else.

Amanda Trujillo Davis
Environmental Representative

Devon Energy Corporation
6488 Seven Rivers Highway
Artesia, New Mexico 88210
(575) 748-0176 Direct
(505) 350-1336 Mobile



Devon - Internal

From: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Sent: Tuesday, May 21, 2019 11:47 AM
To: Davis, Amanda <Amanda.Davis@dmn.com>; Joel Lowry <joel@lowryenvironmental.com>; Jim Amos (jamos@blm.gov) <jamos@blm.gov>
Cc: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Subject: [EXTERNAL] FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

All,

This C-141 will not be accepted from a contractor. OCD, in most instances has little to no regulatory oversight or authority with 3rd party contractors. It would appear this is Devon's fluid, being used on a Devon lease, so OCD considers Devon the Responsible Party, and Devon must submit the C-141. If Devon considers their contractor responsible for remedial action, that is between Devon and their contractor.

Amanda: This release is almost 9 months old at this point. Please submit the C-141 by COB today. If that is not possible, please contact me.

Joel: Your April 12 email subject line indicates the email is for the Tomb Raider, while the body of the email lists Cotton Draw 506. Extremely confusing.

This remediation plan will not be reviewed until the C-141 issue is resolved.

Thank you,

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

From: Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Sent: Monday, May 20, 2019 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

Good morning,

FLUID DELIVERY SOLUTIONS, LLC does not have an OGRID#. In order to process this C-141 I need that number. Why isn't Devon responsible? Did it happen away from the site?

30-015-44811 TOMB RAIDER 1 12 FEDERAL #718H [316874]

General Well Information

Operator:	[6137] DEVON ENERGY PRODUCTION COMPANY, LP	Direction:
Status:	Active	Multi-Lateral:
Well Type:	Oil	Mineral Owner:
Work Type:	New	Surface Owner:
Surface Location:	A-01-23S-31E Lot: 1 360 FNL 1040 FEL	
Lat/Long:	32.339724,-103.7263223 NAD83	
GL Elevation:	3480	
KB Elevation:		Sing/Mult Compl:
DF Elevation:		Potash Waiver:

Fluid Delivery Solutions isn't one of their transporters listed. Shouldn't it be?

Amalia Bustamante

EMNRD-Oil Conservation Division-District II
575-748-1283 EXT. 113

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Monday, May 6, 2019 10:07 AM
To: Bustamante, Amalia, EMNRD <Amalia.Bustamante@state.nm.us>
Subject: FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

From: Joel Lowry <joel@lowryenvironmental.com>
Sent: Friday, April 12, 2019 4:02 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: Davis, Amanda <Amanda.Davis@dmv.com>; Jess Foshee <JFoshee@FDSLCC.com>
Subject: [EXT] FW: 2RP- pending - Tomb Raider 1-12 Fed 718H - Site Assessment and Proposed Remediation Plan

Please find attached the *Site Assessment and Proposed Remediation Plan* along with the applicable pages from the Form C-141 that has been prepared for the Release Site known as the Cotton Draw Unit 506H (1RP-4995). The Release Site is located in Unit Letter "A", Sec. 1, Township 23 South, Range 31 East, on land administered by the New Mexico State Land Office. The release was originally reported by Devon Energy, as it was on one of their locations. With your permission, we ask that the original C-141 be replaced with the attached C-141, which is reflective of the responsible party.

If you have any questions or need any additional information, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel Lowry

Environmental Professional



PO Box 896
Lovington, NM 88260
Direct 432-466-4450

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