

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Monday, August 19, 2019 11:15 AM
To: 'Ike Tavarez'; Hamlet, Robert, EMNRD
Cc: Jennifer Knowlton; Dakota Neel; Rebecca Haskell; Sheldon Hitchcock; Robert McNeill; DeAnn Grant; 'Mann, Ryan'
Subject: RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018)
Attachments: (C-141 Final) COG Loco Hills SWD #1 (2RP-5018) 8.19.19.pdf

RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018) PGQO8-190809-C-1410

Mr. Tavarez,

OCD has received your closure request and final C-141 for RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (**2RP-5018**), thank you. By rule 19.15.29 NMAC, the closure criteria for this site have been fully achieved in all areas. This closure is approved.

Regards,

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: Mann, Ryan <rmann@slo.state.nm.us>
Sent: Wednesday, August 14, 2019 1:58 PM
To: 'Ike Tavarez' <itavarez@concho.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Jennifer Knowlton <jknowlton@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Robert McNeill <RMcNeill@concho.com>; DeAnn Grant <agrants@concho.com>
Subject: RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018)

Ike,

If you intend to leave impact in place ,as stated, closure cannot be issued.

From: Ike Tavarez [<mailto:itavarez@concho.com>]
Sent: Wednesday, August 14, 2019 12:08 PM
To: Mann, Ryan <rmann@slo.state.nm.us>
Cc: Jennifer Knowlton <jknowlton@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Robert McNeill <RMcNeill@concho.com>; DeAnn Grant <agrants@concho.com>
Subject: RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018)

Ryan,

The assessment did show some impact underneath the liner. The release occurred on the eastside of the facility inside the containment. Due to access issues, two (2) hand augers (SP-1 and SP-2) were installed inside the containment and a borehole (BH-1) installed immediately outside the containment near the release point. Based on the results, all of the samples were below 20,000 mg/kg regulatory limit and ranged from 417 mg/kg (SP-1, 5-5.5') to 6,960 mg/kg (SP-2, 1-1.5'). We will be leaving the impact in place underneath the liner facility.

The scarred area in the pasture appears to be from a prior remediation/cleanup performed in the site, which did not have any re-growth in the area. To reclamation the pasture, COG will seed the recent remediation area and include the scarred area to revegetate these areas. Let me know if you need additional information, thanks

Ike Tavarez, PG
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From: Mann, Ryan [<mailto:rmann@slo.state.nm.us>]
Sent: Tuesday, August 13, 2019 5:48 PM
To: DeAnn Grant <agrants@concho.com>
Cc: Jennifer Knowlton <jknowlton@concho.com>; Ike Tavarez <itavarez@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Robert McNeill <RMcNeill@concho.com>
Subject: [External] RE: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018)

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

NMSLO does not accept closure for this release. The report states that a hole developed in the liner, which resulted in the pasture being impacted; so is there contamination beneath the tank battery? This wasn't clear to me. Is your plan to leave to facility contamination since it is less than 20,000 ppm for chlorides?

Reclamation/revegetation is also an issue. This site has had releases that have flowed off pad to the southwest as this one did. There is a scar on Google Earth imagery dating back to at least 2011. Revegetation either has never been achieved or there are releases over the reveg area. This site will need to be able to support vegetation before closure will be issued.

NMOCD may have additional concerns. Please contact me if you have any questions.

Ryan Mann

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From: DeAnn Grant [<mailto:agrant@concho.com>]
Sent: Friday, August 9, 2019 8:57 AM
To: Mann, Ryan <rmann@slo.state.nm.us>
Cc: Jennifer Knowlton <jknowlton@concho.com>; Ike Tavarez <itavarez@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrant@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Robert McNeill <RMcNeill@concho.com>
Subject: (Closure Report) COG Loco Hills SWD #1 10-13-2018 (2RP-5018)

Mr. Mann,

Please see the attached closure report for the COG Loco Hills SWD #001 incident that occurred on October 13, 2018. If you have any questions or concerns please do not hesitate to contact me.

Thank you,

DeAnn Grant
HSE Administrative Assistant
agrant@concho.com
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