

## Rose-Coss, Dylan H, EMNRD

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**From:** Joel Lowry <joel@etechnv.com>  
**Sent:** Monday, August 12, 2019 5:01 PM  
**To:** Rose-Coss, Dylan H, EMNRD  
**Subject:** Re: 1RP 5610 - Serrano - Alternative sampling plan

Thank you Dylan. This will help a lot!

Respectfully,

Joel W Lowry  
Lowry Environmental & Associates

On Aug 12, 2019, at 3:52 PM, Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)> wrote:

Joel,

The OCD cannot accept 5-point composite samples representing 1,000 sq. ft. area. That spacing leaves large amounts of space unaccounted for. However, in an attempt to be reasonable, and in light of the relatively shallow impact and prompt remedial response, the Division is willing to accept 5-point composite samples representing a 750 sq. ft. area.

Thanks,

### Dylan Rose-Coss

*Environmental Scientist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

(505) 476-3488  
<image002.jpg>

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**From:** Joel Lowry <[joel@etechnv.com](mailto:joel@etechnv.com)>  
**Sent:** Sunday, August 11, 2019 12:26 PM  
**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Subject:** RE: 1RP 5610 - Serrano - Alternative sampling plan

Dylan,

After further review, might you consider an alternative sampling plan for 5-point composite samples collected from the floor of the excavation representing an area larger than 500 sq. ft.? When Daniel and I put a pencil to it and began gridding it out for our technicians, we realized that every 500 sq. ft. would require a minimum of 180 5-point composite samples within the affected portion of the caliche well pad. We are hopeful that given the prompt remedial response, abundance of delineation soil samples, location of the release (confined to well pad) and relative shallow impacts that samples that you be willing to approve the collection of samples representing every 1,000 sq. ft. I have attached a map that

was prepared depicting what composite samples collected representing every 500 sq. ft. would equate to.

Please feel free to call me on Monday to discuss further if you would like.

Respectfully,

Joel Lowry

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**From:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Sent:** Monday, July 29, 2019 3:58 PM  
**To:** Daniel Dominguez <[danield@etechenv.com](mailto:danield@etechenv.com)>  
**Cc:** Dustin Crockett <[dustinc@etechenv.com](mailto:dustinc@etechenv.com)>; Joel Lowry <[joel@etechenv.com](mailto:joel@etechenv.com)>  
**Subject:** RE: 1RP 5610 - Serrano - Alternative sampling plan

Mr. Dominguez,

The OCD accepts the alternative sampling plan in which sampling will represent 500 sq. ft. areas and the additional proposed remediation activities.

Please notify the Division 48 hrs prior to beginning the proposed work.

Regards,

**Dylan Rose-Coss**

*Environmental Scientist*  
Oil Conservation Division  
1220 South St. Francis Drive  
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(505) 476-3488  
<image004.jpg>

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**From:** Daniel Dominguez <[danield@etechenv.com](mailto:danield@etechenv.com)>  
**Sent:** Friday, July 26, 2019 11:19 AM  
**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>  
**Cc:** Dustin Crockett <[dustinc@etechenv.com](mailto:dustinc@etechenv.com)>; Joel Lowry <[joel@etechenv.com](mailto:joel@etechenv.com)>  
**Subject:** [EXT] 1RP 5610 - Serrano - Alternative sampling plan

Dylan,

Attached for your review is the Sample Map and Analytical Table for the 6/28/2019 release on the Serrano, operated by Goodnight Midstream. Due to the size of the release and number of samples involved, we are requesting an alternative sampling plan consisting of 5 point composite samples representing areas no greater than 500 sq. ft. I have also attached the initial C-141.

- The entire area has been surface scraped and the areas under process equipment have been dug out with shovels.
- Sample locations SP1, SP2, SP6, SP7, SP16, SP17, SP21, SP22, SP29, and SP32 are below the NMOCD standards and will be excluded from the alternative sampling plan.

- The remaining sample locations will consist of 5 point composites from areas no greater than 500 sq. ft.
- Based on these sample results we will either dig the areas out more or request closure

Please let me know if you need more info or have any questions.

Thank you,

Daniel Dominguez

Project Manager

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