

**From:** Naranjo, Mark  
**To:** [Yu, Olivia, EMNRD](#); [Sarah Johnson](#)  
**Cc:** [Mark Larson](#); [jsoriano@legacyp.com](mailto:jsoriano@legacyp.com); [Honea, Tammy](#)  
**Subject:** RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018  
**Date:** Thursday, March 8, 2018 1:54:12 PM

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The NMSLO also approves.

Mark Naranjo  
Assistant Division Director  
Field Operations Division  
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575.626.2678 Cell  
575.623.9200 Fax  
New Mexico State Land Office  
1001 S. Atkinson  
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**From:** Yu, Olivia, EMNRD [mailto:[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)]  
**Sent:** Thursday, March 8, 2018 11:37 AM  
**To:** Sarah Johnson <[SJohnson@laenvironmental.com](mailto:SJohnson@laenvironmental.com)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>; [jsoriano@legacyp.com](mailto:jsoriano@legacyp.com)  
**Subject:** RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Ms. Johnson:

Thanks for your prompt response. NMOCD approves of the proposed delineation plan for 1RP-4501 with these additional requests:

- One more delineation sample location as close as logistically possible near the tanks. See attachment.
- Liner integrity evaluation near the heater treater. If not intact, NMOCD requests establishment of a delineation sample location.
- Surficial cleaning of the impacted area around the wellhead, as feasible.

Please confirm or inform for clarification. Like approval from NMSLO required.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Sarah Johnson [<mailto:SJohnson@laenvironmental.com>]  
**Sent:** Wednesday, March 7, 2018 10:18 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>; [jsoriano@legacylp.com](mailto:jsoriano@legacylp.com)  
**Subject:** RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Dear Ms. Yu,

*Condition:*

*Please address these concerns regarding the proposed delineation plan for 1RP-4501:*

- *Appendix B is incomplete. Please submit a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.*
- *Aerial imagery from ArcGIS and Google Earth depict visibly impacted area outside the lined containment on the Northwest side. At least one horizontal delineation sample location should be located in the affected area.*
- *Demarcate proposed delineation sample locations within the lined containment based on photo and aerial imagery from ArcGIS.*

Response:

- Please see attached the amended report including a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.
- LAI has added one (1) sample locations on the Northwest side of the containment to account for the stained area.
- LAI has added four (4) sample points within the lined containment to account for samples that may be collected due to any tears or breaks in the liner. Your approval of the amended proposed sample locations is requested.

Respectfully,

Sarah Johnson  
Staff Geologist

507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
Office – 432-687-0901  
Cell – 432-664-5357  
Fax – 432-687-0456  
[sjohnson@laenvironmental.com](mailto:sjohnson@laenvironmental.com)



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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Monday, March 5, 2018 11:18 AM  
**To:** Sarah Johnson; Naranjo, Mark  
**Cc:** Mark Larson; [jsoriano@legacylp.com](mailto:jsoriano@legacylp.com)  
**Subject:** RE: 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Ms. Johnson:

Please address these concerns regarding the proposed delineation plan for 1RP-4501:

- Appendix B is incomplete. Please submit a scaled map of sample locations and preliminary delineation data- collected on October 28, 2016 and August 1, 2017- by EPI.
- Aerial imagery from ArcGIS and Google Earth depict visibly impacted area outside the lined containment on the Northwest side. At least one horizontal delineation sample location should be located in the affected area.
- Demarcate proposed delineation sample locations within the lined containment based on photo and aerial imagery from ArcGIS.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Sarah Johnson [<mailto:SJohnson@laenvironmental.com>]

**Sent:** Thursday, February 15, 2018 2:08 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** Mark Larson <[Mark@laenvironmental.com](mailto:Mark@laenvironmental.com)>; [jsoriano@legacyp.com](mailto:jsoriano@legacyp.com)

**Subject:** 1RP-4501 High Plains 22 State Com #1 Delineation Plan, February 15, 2018

Dear Ms. Yu,

Larson & Associates, Inc. (LAI), on behalf of Legacy Reserves Operating, LP (Legacy), submits the attached delineation plan for a crude oil spill at the High Plains 22 State Com #1 (1RP-4501) in Lea County, New Mexico. Your approval of the delineation plan is requested. Please feel free to contact Manuel Soriano with Legacy at (432) 269-8806 or [jsoriano@legacyp.com](mailto:jsoriano@legacyp.com) , or me at (432) 687-0901 (office) or (432) 664-5357 (cell) if you have any questions.

Respectfully,

Sarah Johnson  
Staff Geologist  
507 N. Marienfeld St., Suite 205  
Midland, Texas 79701  
Office – 432-687-0901  
Cell – 432-664-5357  
Fax – 432-687-0456  
[sjohnson@laenvironmental.com](mailto:sjohnson@laenvironmental.com)



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