

From: Yu, Olivia, EMNRD
To: "Nick Klopp"; "Tucker, Shelly"
Cc: "Jason Wacker"; "Bruce Madden"
Subject: RE: Major release at Government E: 30-025-23708
Date: Wednesday, March 7, 2018 8:02:00 AM

Good morning Mr. Klopp:

As indicated during our phone conversation on March 5, 2018, these are the items that NMOCD requires to facilitate review of the release characterization delineation report as detailed in the directive attached to the reviewed initial C141:

1. Scaled, preferably digital, map of the site with location of release, locations of proposed or actual sample points, and dimensions of the release demarcated. You can either mark on the map or provide a table on a subsequent page of sample points and respective GPS coordinates.
2. Documentation of depth to groundwater search. Use all pertinent sources of data. At a minimum, check
 - a) NM Office of State Engineer: <http://nmwrrs.ose.state.nm.us/nmwrrs/waterColumn.html>
You may search with PLSS, but optimally use the UTM NAD83 radius search. Use the UTM conversion tool to get GPS coordinates in lat/long degrees into UTM coordinates. Use a radius of 2000 m and 5000 m. Output the report in pdf format.
 - b) USGS: <https://nwis.waterdata.usgs.gov/nwis/gwlevels>
 - c) Use the conservative value from sources and proximity to release location to determine water table depth.
3. Check on a topographical map and report distance to surface water body and water sources.
4. Tabulate field and analytical results for chlorides, BTEX, and TPH with IDs and depth of samples. Put the lab analyticals and chain of custody afterwards or in an appendix.
5. Georeferenced photos in tiff, jpg, jpeg etc. format if available. This is easiest if photos are taken with a smartphone with GPS location activated. Otherwise, provide photos that were taken from the same spot pre- and post-cleanup.

If a third-party environmental consultancy is used as mentioned, NMOCD assumes that the environmental professional would follow standard soil sample protocols. Please be advised that NMOCD does not accept a caliche layer as a rationale for not completing delineation. Moreover, delineation sample locations must be representative of the release, which may include establishment of sample locations within facilities, as feasible and practicable. NMOCD must be informed at least 48 hours in advance regarding any requests for site evaluation.

Thanks,
Olivia

From: Yu, Olivia, EMNRD
Sent: Monday, March 5, 2018 10:27 AM
To: 'Nick Klopp' <nklopp@bcoperating.com>; Tucker, Shelly <stucker@blm.gov>
Cc: Jason Wacker <jwacker@bcoperating.com>; Bruce Madden <bmadden@bcoperating.com>
Subject: RE: Major release at Government E: 30-025-23708

Mr. Klopp:

Resubmittal of the initial C-141 is not necessary. However, NMOCD still requires release characterization/delineation of the impacted area. NMOCD recommends a 3rd party environmental professional or consulting firm to conduct the assessment.

Thanks,
Olivia

From: Nick Klopp [<mailto:nklopp@bcoperating.com>]
Sent: Monday, March 5, 2018 9:46 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Jason Wacker <jwacker@bcoperating.com>; Bruce Madden <bmadden@bcoperating.com>
Subject: RE: Major release at Government E: 30-025-23708

4980	3/2/2018	A	BC Operating	Government E SWD #1	30-025-23708	19S-34E-25N	2/28/2018
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On Thursday 3/1/2018 finished picking up remaining puddles with a vacuum truck. 18 bbls of saltwater were lost from what the

tank had previously indicated as compared to total volume recovered. We proceeded to dig up and haul off dirt containing saltwater residue from inside the firewall, as performed in past clean up efforts. I was not able to find the name of the individual that was contacted at the OCD office in Hobbs. I received confirmation that a call was made at 11:30 but could not recall the name of the person at the OCD office.

Please let me know if another C-141 must be filed or if anything else may be missing-

Best Regards,
Nick

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 2, 2018 5:06 PM
To: Nick Klopp <nklopp@bcoperating.com>; Tucker, Shelly <stucker@blm.gov>
Cc: Jason Wacker <jwacker@bcoperating.com>; Bruce Madden <bmadden@bcoperating.com>
Subject: RE: Major release at Government E: 30-025-23708

Dear Mr. Klopp:

Notes:

- Please be advised that volume recovered is rarely 100%, especially as this release did not occur in a lined facility.
- To which NMOCD individual was the initial notification reported at 11:30 MST on 2/28/2018? An NMOCD inspector discovered the release around 1 pm MST on 2/28/2018.

The 1RP for this incident is

4980	3/2/2018	A	BC Operating	Government E SWD #1	30-025-23708	19S-34E-25N	2/28/2018
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Please remember to include this 1RP identifier to all communications. Also, please be advised that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Nick Klopp [<mailto:nklopp@bcoperating.com>]
Sent: Thursday, March 1, 2018 10:31 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Jason Wacker <jwacker@bcoperating.com>; Bruce Madden <bmadden@bcoperating.com>
Subject: RE: Major release at Government E: 30-025-23708

Hi Olivia, see C-141 attached. A hardcopy is being sent to the OCD office @ 1625 N French Drive, Hobbs NM 88240.

Please let me know if you need anything else from our part,

Nick Klopp
Operations Engineer
BC Operating
979.422.2510

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, February 28, 2018 5:12 PM
To: Jason Wacker
Subject: Major release at Government E: 30-025-23708

Mr. Wacker:

This afternoon, February 28, 2018, a NMOCD inspector noticed a major release at the Government E well #1 (30-025-23708). Per NMAC 19.15.29, the Responsible Operator must inform NMOCD verbally within 24 hours when the release is > 25 bbls. An initial C-141 is due by March 14, 2018.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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