

From: [Billings, Bradford, EMNRD](#)
To: ["Katie Jones"](#); ["Edward Hansen"](#); [Hernandez, Christina, EMNRD](#); [Yu, Olivia, EMNRD](#)
Subject: Five ROC/Basin Sites/locations
Date: Tuesday, June 26, 2018 10:16:00 AM

June 26, 2018

Katie Jones – Rice Operating (ROC)
Ed Hansen – Basin Environmental

Re: BD SWD System Sites:

1. BD C-28 EOL-1R426-219 (Pogo Manda EOL)
2. BD I-18 EOL-1R426-13 (Mattern 5 EOL)
3. BD Junction K-20-10-1R426-10
4. BD P-4 EOL- 1R426-06 (Brunson EOL)
5. BD P-17 (Vent) – 1R426-132

As the work plans submitted for additional investigation at the locations indicated above are similar enough, a singular response will suffice for all. Each will be segregated in electronic files internal to the Oil Conservation Division (OCD) data base.

The following:

All sites should be evaluated for soil chloride laterally and vertically to a less than or equal 600 parts per million (ppm) level. Include scaled maps of findings for both lateral and vertical examinations.

Please indicate in reports of continued delineation how the composites are gathered from soil to be possibly used for refill of any excavation. Of note, at least one point of the pile(s) composite must be taken from the middle/centroid portion of the pile.

If data indicate the need for monitor well placement, please discuss said placement(s) with OCD prior to placement. Also note that each well must be installed as per State Engineer Office protocol and any identified OCD needs.

If field measurements/techniques indicate the need to sample soils for hydrocarbons, please make sure that for the TPH assessment that the extended range is evaluated. This includes GRO, DRO and MRO portions.

If there are issues due to infrastructure on locations interfering with delineation, please identify company involved with infrastructure and gain from said company any and all mandated setbacks from their equipment/structures/pipelines.

The investigation work plans as submitted for the above identified locations are approved, with the above attached conditions.

If there are any questions, please do not hesitate to contact this office. The OCD appreciates your continued efforts on these circumstances.

Please keep a copy of this electronic communication, as NO individual to site paper copy will follow.

Sincerely,

Bradford Billings
EMNRD/OCD
Santa Fe

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.