

From: Price, Henryetta
To: [Yu, Olivia, EMNRD](#)
Cc: [Gonzales, Clair](#); [Hernandez, Christina, EMNRD](#); [Tucker, Shelly](#); [Rebecca Haskell](#); [Dakota Neel](#); [Sheldon Hitchcock](#); [DeAnn Grant](#); [Tavarez, Ike](#)
Subject: Re: [EXTERNAL] RE: COG - Miller B#3 Work Plan Approval Request (1RP-4597)
Date: Thursday, July 19, 2018 4:13:04 PM

Good Afternoon,

After visiting the above site today, it is found that the spill path across the pit area will need to be characterized for impact. My suggestion is to do this carefully as we do not want to get into any pit material. There is vegetation present on the pit area which is good news, but vegetation might have been impacted in the immediate area due to possible runoff.

In the work plan, figure 3 shows the path of the spill, whereas aerial photos show a part of the spill that went NW and pooled in a low lying area. I am assuming that area was sampled as well since there is a pad of caliche where the fluids pooled. There is a patch of caliche at sample point T-1 and another mound of caliche where the possible pit area is identified and also coincides with the second path that was not mentioned in the work plan.

Please revise the work plan to include the path north of the main flow path, characterization of the impact over the pit, and background samples will be pulled at least 100 ft. from the impact area.

Please do not hesitate to contact me with any questions or issues.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management
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The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Wed, Jul 11, 2018 at 7:05 PM, Price, Henryetta <hprice@blm.gov> wrote:

Good Evening,

I do not think that delineating the pit area will do any good. I do not think there will be any

significant impact than what is identified on either side of the pit. BLM reclamation objectives may be impacted if we begin to disturb the pit. BLM however, will request that at least the top 2-3 ft. of impacted material is removed (root zone) and the bottom of the pit is capped with an impermeable liner or material to prevent any pit contaminants from significantly impacting reclamation. The excavation will extend 2 ft. past the impact area on the pit.

I would also like to conduct a visual inspection of the excavated area prior to backfill.

Henryetta Price

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On Wed, Jul 11, 2018 at 2:12 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Ms. Gonzales:

The portion of the release area for 1RP-4597 that flowed over a reserve pit will need to be characterized/delineated as well.

Thanks,

Olivia

From: Gonzales, Clair <Clair.Gonzales@tetrattech.com>

Sent: Friday, June 15, 2018 9:54 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Cc: Tucker, Shelly <stucker@blm.gov>; hprice@blm.gov; Rebecca Haskell <RHaskell@concho.com>; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>; Tavarez, Ike <Ike.Tavarez@tetrattech.com>
Subject: COG - Miller B#3 Work Plan Approval Request (1RP-4597)

Good Morning,

Attached is the work plan for the above referenced site located in Lea County, New Mexico. Once approved COG will implement the work plan.

Thank you,

Clair Gonzales

Clair Gonzales | Project Manager

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