

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, July 14, 2011 8:43 AM  
**To:** 'Hale, Aaron'  
**Cc:** james\_amos@nm.blm.gov; driggs@sm-energy.com; Chad McNeely; Reed, Timothy; Tavaréz, Ike  
**Subject:** RE: SM Energy PDU 507, PDU Tract 1 Tank Battery, and Geronimo Sites

Reference: SM Energy \* Parkway Delaware Tract 1 Btry (PDU 801) \* 30-015-26012 \* P-35-19s-29e \* DOR: 5/14/09 \* 2RP-692

SM Energy \* Parkway Delaware Unit 507 \* 30-015-29504 \* G-35-19s-29e \* DOR: 12/27/09 \* 2RP-393

SM Energy \* Geronimo Fed 001 \* G-24-18s-31e \* DOR: 12/13/09 \* 2RP-720

Greetings,

NMOCD is in receipt of remediation proposals for produced fluid releases as listed at the above referenced well sites in Eddy County, New Mexico. In addition, to the proposals, modifications to the proposals were made as per Mr. Hale's July 13 email below.

Conditions of approval (COA) relevant to all the sites are as follows:

- Notify NMOCD District 2 office 48 hours prior to commencement of remedial activities.
- Notify NMOCD District 2 Office 48 hours prior to obtaining samples where the analyses are to be submitted to NMOCD.
- Notify NMOCD District 2 Office 48 hours prior to installation of any liner/cap/barrier.
- Submit to NMOCD a Form C-141 Final Report and closure report upon satisfactory completion of project/projects.
- Like approval by BLM, or any other regulatory authority, as may be applicable.

In addition to the above listed COA, the following COA are applicable to each specific site:

Parkway Delaware Tract 1 Btry:

- In areas proposed to excavate to specific depth/depths as practicable, advise NMOCD as to what depth/depths are actually achieved prior to backfill.
- Submit to NMOCD, a proposed specific time frame for obtaining samples for evaluation of the MicroBlaze application area.
- As clarified by phone conversation with Mr. Hale, AB-1 as referenced in the modification, is actually SB-1. Provide NMOCD, for review, results of the extended delineation efforts in the areas of SB-1, AH-4 and AH-5

Parkway Delaware Unit 507:

- Notify NMOCD District 2 office in the event proposed excavation depths are not achieved.

Geronimo Federal 001:

- No additional COA.

Be advised NMOCD 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 ground water, surface water, human health or the

environment. In addition, NMOCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notifications, please contact me.

**MIKE BRATCHER**

NMOCD District 2  
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**From:** Hale, Aaron [<mailto:Aaron.Hale@tetrattech.com>]

**Sent:** Wednesday, July 13, 2011 10:28 AM

**To:** Bratcher, Mike, EMNRD

**Cc:** [james\\_amos@nm.blm.gov](mailto:james_amos@nm.blm.gov); [driggs@sm-energy.com](mailto:driggs@sm-energy.com); Chad McNeely; Reed, Timothy; Tavarez, Ike

**Subject:** SM Energy PDU 507, PDU Tract 1 Tank Battery, and Geronimo Sites

Mike –

This e-mail is to modify the submitted work plans for SM Energy Company indicated in the subject line per our meeting in your office. The scope of work provided in the work plans will be modified as discussed for the following sites:

1. PDU 507 – On Figure 4, the area around SB-9, AH-10, and AH-11 shows a proposed excavation depth to 5 feet. The modification to the submitted proposal will be to place a liner in this area at 5 feet prior to backfilling.
2. PDU Tract 1 Tank Battery – The area around AH-1 and SB-3 was proposed to excavate to 2 feet bgs. The modifications to the submitted proposal for this area will be to excavate to 5 feet bgs or as deep as practicable. In addition, the area proposed to have microblaze application will be left open and resampled to evaluate hydrocarbon concentrations over time. Finally, sample locations AB-1, AH-4 and AH-5 will be further delineated with mechanical equipment (backhoe or mini trackhoe) if space allows for the safe operation of the equipment.
3. Geronimo – No modifications were requested for this work plan.

Please let me know if you are good with the work plans with the above modifications. If so, we will implement the work plans pending BLM approval.

Aaron M. Hale, P.G. | Project Manager III  
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**Bratcher, Mike, EMNRD**

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**From:** Microsoft Outlook  
**To:** Hale, Aaron; james\_amos@nm.blm.gov; driggs@sm-energy.com; Chad McNeely; Reed, Timothy; Tavaraz, Ike  
**Sent:** Thursday, July 14, 2011 8:54 AM  
**Subject:** Relayed: RE: SM Energy PDU 507, PDU Tract 1 Tank Battery, and Geronimo Sites

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

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Subject: RE: SM Energy PDU 507, PDU Tract 1 Tank Battery, and Geronimo Sites