

**From:** Patterson, Heather, EMNRD  
**To:** ["Lupe Carrasco"](#)  
**Cc:** [Amanda Trujillo](#); [Bratcher, Mike, EMNRD](#); [Tucker, Shelly](#); [jamos@blm.gov](mailto:jamos@blm.gov)  
**Subject:** RE: (Work Plan- Closure) Owl 20504 JV-P #5 (30-015-35435)  
**Date:** Friday, August 07, 2015 9:19:00 AM

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RE: COG \* Owl 20504 JV-P #005 \* 30-015-35435 \* 2RP-3104

Lupe,

The OCD has read and carefully considered your request to reconsider our denial. The OCD District II office does appreciate your argument, but we also have certain policies we must uphold.

- We accept your argument on depth to groundwater in this area, but contend that this evidence should have been in your original report. We request that you include it in your revision;
- In the event that chlorides are naturally high, a background sample will always be considered by the district II office;
- The OCD's request for further delineation still stands. A delineation to 250 is a Sante Fe policy, and any further arguments should be brought to Jim Griswold, our Environmental Bureau Chief;
- We are in agreement that this release poses little threat to groundwater, but this site's close proximity to the draw still makes this an environmentally sensitive area.

The OCD requests a revision of your closure report, including an improved groundwater investigation and the extended delineation. We do not expect that any additional onsite work will be required.

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.

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

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

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**From:** Lupe Carrasco [<mailto:GCarrasco@concho.com>]  
**Sent:** Thursday, August 06, 2015 2:17 PM  
**To:** Patterson, Heather, EMNRD  
**Cc:** Amanda Trujillo; Bratcher, Mike, EMNRD; Tucker, Shelly; [jamos@blm.gov](mailto:jamos@blm.gov)  
**Subject:** RE: (Work Plan- Closure) Owl 20504 JV-P #5 (30-015-35435)

Mrs. Patterson,

Thanks for your response to my proposed closure of the Owl 20504 JV-P #5 SWD, but I would like

you to reconsider the denial of this proposal based on the following:

- Depth to ground water for the area does show to be shallow, but consideration must be given to the changes in elevation throughout this area. The Owl SWD is situated on a hillside at an approximate elevation of 3,294' whereas the wells listed in the area sit at the bottom of the draw which are closer in elevation to 3,100 feet. (Well in section 7 is at ~3194' with a depth of well at 35'). The ChevronTexaco Trend Maps are a general guidance for ground water trends but do not demonstrate topographical data.
- I have reviewed the Tetra-Tech data from COG remediation 2RP-1599, it does not take into account the change in elevation for the purpose of their remediation, and feel this should be re-evaluated. The report also mentions groundwater at a depth of 25' based on the NMOCD groundwater maps, but they disprove this information by core sampling to a depth of 30' on location with no mention of reaching ground water. Their research also states that ground water in this area is high in chloride and sulfate concentrations.
- To date COG has only been requested by NMOCD to provide data showing delineation to less than 1000 ppm. We have consistently complied with this request and feel 250 ppm is an inadequate value to represent soils of southern Eddy Co. We understand that there are special circumstances where 250 ppm maybe a practical request, however our work plan/closure report shows proper delineation of the release area in question.
- The initial scrape performed on the location was done at an approximate depth of 2-4" throughout the release area which makes the depth between the surface and 1' mark 8 – 10". Attached is a model showing the most conservative (worst case) scenario with groundwater at a depth of 20' (assuming that the trend maps are correct at <25'). According to the model, the chlorides left in place would have a negligible impact on groundwater.
- A google earth image has been attached depicting the locations of the water wells near the SWD.

Thanks for your consideration. Please let me know if you have any questions or would like to discuss this release further by phone or in person.

**Lupe Carrasco**

Environmental Coordinator

Concho Resources

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**From:** Patterson, Heather, EMNRD [<mailto:Heather.Patterson@state.nm.us>]  
**Sent:** Wednesday, August 05, 2015 8:40 AM  
**To:** Lupe Carrasco  
**Cc:** Amanda Trujillo; Bratcher, Mike, EMNRD; Tucker, Shelly; [jamos@blm.gov](mailto:jamos@blm.gov)  
**Subject:** RE: (Work Plan- Closure) Owl 20504 JV-P #5 (30-015-35435)

RE: COG \* Owl 20504 JV-P #005 \* 30-015-35435 \* 2RP-3104

Lupe,

The OCD is in receipt of your proposed work plan/closure report for the above listed site. This closure request is denied for the following reasons:

- According to OSE website (see attached), the ChevronTexaco Trend map, and a previous COG remediation of the same site (2RP-1599), the depth to groundwater is less than 50 feet and possibly less than 25 feet. Therefore your site ranking of zero is not acceptable;
- The OCD will require further chloride delineation at S1, with a target goal of 250mg/kg;
- The depth of the initial scrape is unclear, as well as what contamination remains between the surface and your 1 foot sample.

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.

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

Heather Patterson  
Environmental Specialist  
NMOCD District II  
Office (575)748-1283 ext.101  
Cell (575)703-0228

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**From:** Lupe Carrasco [<mailto:GCarrasco@concho.com>]  
**Sent:** Tuesday, August 04, 2015 2:31 PM  
**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; James Amos; 'stucker@blm.gov'  
**Cc:** Amanda Trujillo  
**Subject:** (Work Plan- Closure) Owl 20504 JV-P #5 (30-015-35435)

Mr. Bratcher,

Attached for your consideration is a Work Plan/Closure Report for the Owl 20504 JV-P #5 SWD

release that occurred on June 24, 2015. Please feel free to contact me with any questions or concerns.

Thanks!

**Lupe Carrasco**

Environmental Coordinator

Concho Resources

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**From:** Amanda Trujillo

**Sent:** Thursday, July 09, 2015 11:18 AM

**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; Jeff Robertson; James Amos

**Subject:** (C-141 Initial) Owl 20504 JV-P #5 (30-015-35435)

Mr. Bratcher/Mr. Amos,

Attached is a C-141 Initial for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

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Office: 575.748.6930

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**From:** Amanda Trujillo

**Sent:** Friday, June 26, 2015 2:33 PM

**To:** 'Bratcher, Mike, EMNRD'; 'Patterson, Heather, EMNRD'; 'Jeff Robertson'; 'James Amos'

**Subject:** (Notification) Owl 20504 JV-P #5 (30-015-35435)

Mr. Bratcher,

COG Operating LLC is reporting a release on the Owl 20504 JV-P #5 (30-015-35435)

Unit J Section 18, Township 26S Range 27E

The release occurred at 11:00 am on 6/24/2015

Released: 100 bbls oil; 510 bbls PW

Recovered: 90 bbls oil; 500 bbls PW

The release was caused by a tank overflow and remained within the lined containment. The area is being evaluated and a C-141 will be submitted. If you have any additional questions please feel free to contact me.

Thank you,

**Amanda Trujillo**

Senior Environmental Coordinator

COG Operating LLC

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