

From: [Tucker, Shelly](#)  
To: [Patterson, Heather, EMNRD](#)  
Cc: [Kimberly M. Wilson](#); [Bratcher, Mike, EMNRD](#); [Fulks, Brett](#); [Nettles, Matt](#); [David Adkins](#)  
Subject: Re: Cotton Draw #153 \* 30-015-38535 \* 2RP-3241  
Date: Friday, November 13, 2015 10:08:53 AM  
Attachments: image001.png

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BLM concurs with the NMOCD findings and stipulations.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

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 Fri, Nov 13, 2015 at 8:32 AM, Patterson, Heather, EMNRD  
<[Heather.Patterson@state.nm.us](mailto:Heather.Patterson@state.nm.us)> wrote:

RE: Devon \* Cotton Draw Unit #153H \* 30-015-38535 \* 2RP-3241

Kimberly,

Thank you for your work plan and further delineation. Unfortunately, this well is not old enough to be considered historic by the OCD, therefore the chlorides found in place are either from the previously reported release from October 2012 (2RP-1329) or an unreported release. The OCD is satisfied with the vertical delineation of this chloride release, but feel that the horizontal extent is still unknown.

If Devon chooses, they may address these two releases separately, but we are reluctant to defer clean up actions except in cases where equipment make it physically impossible.

In addition, both the OCD and BLM requested further delineation at S-1. We must ask for the hydrocarbons in this location be delineated before we can approve excavation depths here.

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:** Kimberly M. Wilson [mailto:[kwilson@talonlpe.com](mailto:kwilson@talonlpe.com)]

**Sent:** Tuesday, November 10, 2015 12:17 PM  
**To:** Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD  
**Cc:** Fulks, Brett; Nettles, Matt; David Adkins  
**Subject:** Cotton Draw #153 \* 30-015-38535 \* 2RP-3241

Mike and Heather,

Attached please find attached the work plan for the above referenced location. If you have any questions or concerns please feel free to contact me.

Thank you.

Respectfully submitted,

Kimberly M. Wilson

Project Manager

TALON/LPE

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Better Business Bureau Torch Award for Marketplace Ethics: 2010 Winner, 2009 Finalist

Staples Foundation for Learning Hall of Fame Recipient:2010

ICIC and Business Week- Top 100: 2010, 2009, 2008, 2007, 2006

Inc. 500/5000: 2012, 2011, 2010, 2009, 2008, 2007