

From: [Weaver, Crystal, EMNRD](#)
To: [Cliff Brunson](#); [Bratcher, Mike, EMNRD](#); [Naranjo, Mark \(MNaranjo@slo.state.nm.us\)](#)
Cc: [Becky Haskell](#); [Ken Swinney](#); [Jennifer Gilkey](#); [Kathy Purvis](#)
Subject: RE: COG SRO State Com #48 (2RP-4182) - Delineation Workplan
Date: Friday, February 16, 2018 12:48:00 PM
Attachments: [Delineation Workplan, SRO State Com #48H.PDF](#)

RE: COG * SRO State COM #48 * 30-015-41779 * 2RP-4182

Rebecca/Cliff,

The delineation/remediation work plan proposal for this release is approved with the following conditions/stipulations:

- This spill occurred back on 4/21/17 all in the pasture from a flowline with a reported 100bbls produced water lost and 0bbls recovered. In the work plan it states that ground water analysis was done by cross referencing OSE NMWRRS program using radius search. Based on the radius inputted into the search no depth to ground water data came back. The only well location that came back from that search was C-2478 which cited depth of casing set at 100ft. but no depth to ground water was cited for that well. OCD conducted a data search for depth to ground water and found that the closest well to the location of the spill that had ground water data was USGS well 320230104060601 that cites depth to water at 17.52 ft. Therefore that data is the most relevant and will thus allow for a site ranking score of 20 for this release.
- With site ranking being a 20 that wont change target delineation or clean up levels for chlorides, since it is 600ppm no matter what site ranking is, however, it will change the evaluation/protective action levels that OCD will need to assess for this location.
- So based on depth to ground water data and analytical data provided for this release:
 - OCD will require that COG excavate thru the 9ft interval and then set a liner for the entire area demarked in the purple color on the site map (as it is referred to in the work plan). Although that depth does not allow for removal of all contamination OCD sees it as getting the bulk of the cumulation zone out and thus has offered this requirement in compromise. Confirmation side wall sample lab data will be required at both the 4ft interval and the 9ft interval for this excavated area.
 - Also the area that sample point T3 represents that is demarked in the green color on the site map (as it is referred to in the work plan) will be excavated thru the 3ft. interval since the spill takes a narrow pathway in this green marked area it is deemed by OCD that it would be practicable to get all chloride contaminants over 600ppm out from this area. Confirmation sidewall sample lab data will also 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 Mike Bratcher and/or myself in the District II Office.

Crystal Weaver

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From: Cliff Brunson [mailto:cbrunson@bbcinternational.com]

Sent: Wednesday, November 22, 2017 2:08 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Amber Groves <agroves@slo.state.nm.us>

Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Becky Haskell <rhaskell@concho.com>; Ken Swinney <kswinney@bbcinternational.com>; Jennifer Gilkey <jgilkey@bbcinternational.com>; Kathy Purvis <kathy@bbcinternational.com>

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Mike and Amber,

Please find the attached Delineation Workplan and remediation proposal for the COG SRO State Com #48 (2RP-4182). COG is requesting that you review this plan and is looking forward to both the OCD's and SLO's approval.

If you have any questions, please let me know.

Thanks, Cliff

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