

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, August 26, 2020 2:38 PM
To: 'Ashley Maxwell'; Fields, Jon; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: Alena Miro (ammiro@eprod.com); Lynn Acosta
Subject: RE: NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E 0N 0E

NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E 0N 0E

Ms. Maxwell,

The OCD has approved the proposed sampling plan for incident # RE: NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E 0N 0E. SMA and Enterprise will collect composite samples every 200 square feet. The total area of the overspray is 31,144 square feet. This results in 155.72 sample areas. SMA having collected 13 sample locations previously, will be collecting 155 samples on Friday, August 28, 2020 beginning at 7:00am.

Please note that in the event that the time and dates change it is the Operators responsibility to communicate to the OCD to reschedule the sampling event or request a variance for the sampling notification requirements.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Victoria.Venegas@state.nm.us

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 groundwater, 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, or local laws and/or regulations.

From: Ashley Maxwell <ashley.maxwell@soudermiller.com>
Sent: Wednesday, August 26, 2020 10:55 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Fields, Jon <JEFIELDS@eprod.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: Alena Miro (ammiro@eprod.com) <ammiro@eprod.com>; Lynn Acosta <lynn.acosta@soudermiller.com>
Subject: [EXT] RE: NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E 0N 0E
Importance: High

Good Morning Ms. Venegas,

SMA and Enterprise will move forward with collecting composite samples every 200 square feet. In the attached report, the total area of the overspray is 2893.38 square meters which is 31,144 square feet. This results in 155.72 sample areas. SMA having collected 13 sample locations previously, will be collecting 155 samples on Friday, August 28, 2020 beginning at 7:00am.

Please acknowledge that you approve of this sampling plan and accept this as your 48-hour notification.

Ashley Maxwell
Project Scientist

Corporate Registrations: AZ Engineering/Geology/Surveying Firm (14070), ID Engineering/Surveying Firm (C-3564), SD Surveying Firm (C-7436), TX Engineering Firm (8877), TX Geology Firm (50254), TX Surveying Firm (10162200), WY Engineering/Surveying Firm (S-1704)



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From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Thursday, August 20, 2020 3:11 PM

To: Fields, Jon <JEFIELDS@eprod.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: Ashley Maxwell <ashley.maxwell@soudermiller.com>

Subject: NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E ON OE

NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E ON OE

Mr. Fields,

The OCD has denied the submitted Variance Request for incident # NRM2006951654 58481 WQU PIPELINE @ H-20-22S-26E ON OE for the following reasons:

- SMA/Enterprise requests a variance of 19.15.29.12(D)(1)(c) NMAC to collect 19 closure samples in the overspray area that encompasses approximately 36,800 square feet, i.e. one sample every 2000 square feet. SMA/Enterprise proposes to use the Visual Sample Plan (VSP) software tool, which was created by the Department of Energy. Considering that the release occurred in a tributary that flows directly to a significant watercourse, and is located within a 100-year floodplain in a critical karst occurrence potential area, the OCD believes that the proposed variance does not provide equal or better protection of freshwater, public health and the environment -19.15.29.14.A.(1) & (2) NMAC.

Thank you,

Victoria Venegas
State of New Mexico

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Oil Conservation Division
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