

**From:** [Smith, Cory, EMNRD](#)  
**To:** [Lindsay Dumas](#); [Hernandez, Emily, EMNRD](#)  
**Cc:** [Polak, Tiffany, EMNRD](#); [Griswold, Jim, EMNRD](#); [Billings, Bradford, EMNRD](#)  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715  
**Date:** Monday, May 17, 2021 7:54:00 PM

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Lindsay,

After our discussion and reviewing the HilCorp April 7, 2021 email the OCD has approved the proposed remediation plan with the following conditions of approval:

1. HEC will provide email notice to the OCD at least two business days prior to the start of delineation activities.
2. OCD approves the proposed delineation borehole with the following conditions of approval:
  - a. If the proposed borehole location (Blue dot) needs to be changed for any reason, HEC will notify and get OCD approval prior to drilling the delineation borehole
  - b. The borehole will be logged by a trained professional
  - c. The delineation borehole needs to be sampled utilizing a split spoon sampler
  - d. In addition to the highest observed impacts and the bottom hole sample, HEC will collect a laboratory grab sample at every 5' interval and analyze it for constituents in Table I
3. OCD recommends that the pilot test be done in a phased approach by only install enough SVE wells to conduct the pilot test before completing the rest of the SVE system. This approach will ensure proper screen length and borehole distances for efficient remediation.
4. New SVE boreholes will be:
  - a. Logged by a trained professional
  - b. Sampled utilizing a split spoon sampler
  - c. Laboratory sampled at a interval of every 5' for the constituents in Table I in addition to the bottom hole sample
5. OCD also requires that radius of effect also be included into the report following the pilot test.
6. As discussed there is reasonable probability due to the distance, lithology, depth to water and the unknown nature of the release that it may have impacted ground water. The OCD is requiring HEC to collect a water sample of the spring identified in previous emails for the protection of fresh water, human health and the environment. HEC will analysis the water for the following constituents and submit the findings:
  - a. Total Dissolved Solids
  - b. pH
  - c. Total Petroleum Hydrocarbon EPA method 8015
  - d. Volatile Organic Compounds EPA Method 8260 (Full)
  - e. Cation / Anions EPA Method 300.0/300.1
7. HEC will conduct the required delineation and any other needed delineation within 30 days of this email depending on driller availability. HEC will notify the OCD if there is an expected delay via email as soon as possible.
8. HEC will submit to the OCD via the E-permitting portal, an updated remediation plan no later than July 18, 2021(60 days from approval) that meets all of the requirements of 19.15.29.12 NMAC and in addition, include the following:
  - a. Findings of the SVE pilot testing
  - b. A schematic of the radius-of-influence, radius of effect and SVE zones
  - c. A diagram of the SVE system (including blower, knockout tank, etc.)
  - d. A diagram of SVE well construction

e. Timeline of proposed SVE installation and start of remediation

If you have any additional questions please let us know as soon as possible.

Thank you,

**Cory Smith** • Environmental Specialist  
Environmental Bureau  
EMNRD - Oil Conservation Division  
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505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

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**From:** Lindsay Dumas <ldumas@hilcorp.com>  
**Sent:** Wednesday, April 28, 2021 8:38 AM  
**To:** Hernandez, Emily, EMNRD <Emily.Hernandez@state.nm.us>  
**Cc:** Polak, Tiffany, EMNRD <Tiffany.Polak@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>  
**Subject:** [EXT] RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Good Morning Emily – Hilcorp is available on Thursday May 6<sup>th</sup> at 9AM. Please send the Teams meeting at your earliest convenience. Thank you!

Kind regards,

*Lindsay Dozescu*  
Environmental Specialist  
**Hilcorp Energy – L48 West**  
Office: 832-839-4585  
Mobile: 281-794-9159

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**From:** Hernandez, Emily, EMNRD [<mailto:Emily.Hernandez@state.nm.us>]  
**Sent:** Wednesday, April 21, 2021 11:51 AM  
**To:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Cc:** Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Greetings Lindsay. With new management in place, myself included, the OCD is looking to enhance our review practices in order to move forward in a more proactive and consistent fashion. The OCD still has a few questions and concerns with regard to your plan that we feel would be better served in discussion. In terms of prep, if your team is prepared to talk about the proposed plan and rationale that is all the prep you need. I look forward to meeting everyone.

I offer the following 10 dates & times (MT) for a Teams Meeting the first week in May:

1. Monday May 3<sup>rd</sup> – 11:00 AM to 12:00 AM
2. Monday May 3<sup>rd</sup> – 3:00 PM to 4:00 PM
3. Tuesday May 4<sup>th</sup> – 11:00 AM to 12:00 AM

4. Tuesday May 4<sup>th</sup> – 1:00 PM to 2:00 PM
5. Wednesday May 5<sup>th</sup> – 9:30 AM to 10:30 AM
6. Wednesday May 5<sup>th</sup> – 4:00 PM to 5:00 PM
7. Thursday May 6<sup>th</sup> – 9:00 AM to 10:00 AM
8. Thursday May 6<sup>th</sup> – 1:00 PM to 2:00 PM
9. Friday May 7<sup>th</sup> – 10:00 AM to 11:00 AM
10. Friday May 7<sup>th</sup> – 3:00 PM to 4:00 PM

Thank you,

**Emily A. Hernandez** • Environmental Bureau Chief  
EMNRD - Oil Conservation Division  
1220 S. St. Francis Drive | Santa Fe, NM 87505  
505.490.5472 | [Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

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**From:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Sent:** Monday, April 19, 2021 2:36 PM  
**To:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>  
**Cc:** Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Subject:** [EXT] RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Hi Emily – Those dates and times will not work for us. Could you please provide dates/times that work for NMOCD for the first week in May?

Hilcorp provided a thorough response to NMOCD's deficiencies, can you provide us a detailed response as to what needs to be discussed further in this meeting? Hilcorp would like to be prepared for meeting discussion topics. Thank you!

Kind regards,

*Lindsay Dosescu*  
Environmental Specialist  
**Hilcorp Energy – L48 West**  
Office: 832-839-4585  
Mobile: 281-794-9159

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**From:** Hernandez, Emily, EMNRD [<mailto:Emily.Hernandez@state.nm.us>]  
**Sent:** Monday, April 19, 2021 1:24 PM  
**To:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Cc:** Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Good afternoon Ms. Dosescu. We have reviewed Hilcorp's responses and would like the opportunity to meet and discuss in order to move the plan forward. Below are a few dates & times, please let me know which will work for you and your team and I will send the Teams Meeting invite.

4/23/21: 1:00 PM – 2:00 PM  
4/26/21: 2:30 PM – 3:30 PM  
4/27/21: 1:00 PM – 2:00 PM

Thank you,

**Emily A. Hernandez** • Environmental Bureau Chief  
EMNRD - Oil Conservation Division  
1220 S. St. Francis Drive | Santa Fe, NM 87505  
505.490.5472 | [Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

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**From:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Sent:** Monday, April 19, 2021 12:01 PM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>;  
Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>;  
Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** [EXT] RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Cory – Just checking on the below email. Hilcorp is ready to move forward with the project after NMOCD approves. Please let me know if you have any questions.

Kind regards,

*Lindsay Dosescu*  
Environmental Specialist  
**Hilcorp Energy – L48 West**  
Office: 832-839-4585  
Mobile: 281-794-9159

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**From:** Lindsay Dumas  
**Sent:** Wednesday, April 7, 2021 9:52 AM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>;  
Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>;  
Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Cory - Please see responses to the stated deficiencies below:

1. Hilcorp plans to advance an additional boring in the approximate location of the blue dot on the attached figure. This location may require adjustment to accommodate drill rig access based on topography, fencing, vegetation, and/or landowner agreement. This boring will be advanced to an anticipated depth of 50 feet below ground surface based on the depth of impact discovered in other onsite borings. Soil samples will be collected from the borehole every foot and field screening will be conducted using a photoionization detector (PID). If field screening results measure greater than 100 parts per million (ppm) at a depth of 50 feet, the boring will be advanced deeper until at least two consecutive PID readings are less than 100 ppm. At least two samples will be collected for laboratory analysis: one sample from the total depth and one sample from the

interval with the highest field screening result. The samples will be analyzed for BTEX and TPH. Drilling will be conducted within 30 days of approval of this email, dependent on driller availability.

2. Hilcorp plans to install the 10 SVE wells in the locations proposed in the *Site Characterization Report and Remediation Work Plan* prepared by WSP (dated December 23, 2020). As discussed in the work plan, these wells will consist of four shallow-screened wells (screen 5 to 15 feet bgs) and six deep-screened wells (screen 15 to 35 feet bgs). These SVE wells will be installed concurrently with advancing the additional delineation boring addressed in Comment 1 above (again within 30 days of approval of this email). Using the SVE wells, Hilcorp will conduct a pilot test and provide the NMOCD with the requested information, including radius-of-influence, specifications of SVE equipment, and the need for passive air inlets. Proposed runtimes and maintenance schedules also will be provided based on the type of system recommended for the site. In addition, if the new delineation boring (comment 1) indicates petroleum hydrocarbon impacts greater than the NMOCD Table 1 Closure Criteria, that boring also will be completed as an SVE well. The pilot test will be conducted using a vacuum truck to induce a vacuum in one SVE well at a time and measure induced vacuum in the surrounding SVE wells. This information will be used to size the SVE equipment in order to successfully induce vacuum in impacted areas of the site. The pilot test will be conducted within 30 days after installation of the SVE wells.
3. A schematic of the radius-of-influence and SVE zones, as well as a diagram of the SVE system (including blower, knockout tank, etc.), will be provided within 30 days of completing the pilot test.
4.
  - a. Based on review of the cathodic well report, Hilcorp agrees that groundwater at the site may be less than 100 feet. However, borings advanced during delineation activities confirmed that groundwater was not present at depth up to 55 feet bgs. Regardless, Hilcorp has already accepted the most stringent NMOCD Table 1 Closure Criteria set forth in [19.15.29.12](#) NMAC for site remediation based on the proximity of the site to a significant watercourse. Additionally, because the subsurface soil impacts have been vertically delineated and have not been shown to impact groundwater, the actual depth to groundwater below the site does not currently affect the planned remediation.
  - b. Hilcorp will need additional information regarding the purpose of a “baseline” sample of the spring. A baseline sample is typically collected to establish background conditions prior to an activity to ensure that activity does not impact a potential receptor. If any constituents are elevated in the baseline sample requested, will NMOCD allow for those concentrations to serve as background? If the sampling is actually being requested to evaluate potential impact to the spring by this release, why is that necessary if the release is delineated at some distance from the spring? Why would a historical release of condensate that has been fully delineated to demonstrate it has not impacted the spring or remediation of that release over any timescale affect the TDS, pH, cation, or anion concentrations of the spring when volatile organic compounds are contaminants of concern based on the known source and results of source characterization? Why is TPH required if it is not regulated by NMWQCC standards?

During the site characterization performed in the fall of 2020, borings were advanced up to 55 feet bgs and did not encounter groundwater at the site. In addition, soil samples collected and analyzed from the terminus of each boring indicated that TPH and BTEX were not present at concentrations above the strictest NMOCD closure criteria in any boring. Based on the data collected during drilling activities, petroleum hydrocarbon impacts do not extend greater than 35 feet bgs and have not impacted groundwater. Based on NMOCD’s request, Hilcorp plans to advance an additional boring southeast of the assumed release/source. If data collected from this additional delineation boring confirm that impacts do not extend further to the southeast, and also do not extend to groundwater (if encountered during drilling), Hilcorp does not agree with the NMOCD request to sample water from the spring located approximately 650 feet directly south of the site. The purpose of the additional delineation boring is to further demonstrate the historical nature of the release did not affect the spring. Based on the forthcoming data and information collected from that boring plus additional information from NMOCD regarding the purpose of a baseline

sample, Hilcorp and NMOCD can further discuss sampling of the spring.

Kind regards,

*Lindsay Dosescu*

Environmental Specialist

**Hilcorp Energy – L48 West**

Office: 832-839-4585

Mobile: 281-794-9159

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**From:** Lindsay Dumas

**Sent:** Thursday, April 1, 2021 4:08 PM

**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>

**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Cory - Based on internal discussions, Hilcorp doesn't believe a Teams meeting would be beneficial. We are preparing a response to each deficiency in writing, which will include a timeline. Our response will be submitted no later than Wednesday, April 7<sup>th</sup>.

Kind regards,

*Lindsay Dosescu*

Environmental Specialist

**Hilcorp Energy – L48 West**

Office: 832-839-4585

Mobile: 281-794-9159

---

**From:** Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]

**Sent:** Thursday, April 1, 2021 2:21 PM

**To:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>

**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Good Afternoon Lindsay,

Just wanted to follow up on the below email and get a status update.

**Cory Smith** • Environmental Specialist

Environmental Bureau

EMNRD - Oil Conservation Division

1000 Rio Brazos | Aztec, NM 87410

505.334.6178 x115 | [Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>

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**From:** Smith, Cory, EMNRD  
**Sent:** Friday, March 26, 2021 11:20 AM  
**To:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>;  
Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>;  
Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Good Morning Lindsay,

Currently OCD is unable to hold in-person meetings due to Covid-19 safe practices. If needed the OCD can host a Microsoft Teams virtual meeting. Does Hilcorp still wish to meet on April 15<sup>th</sup> at 10AM? If so I can verify with OCD staff if the proposed time will be acceptable.

In regards to your questions, the spring is located approximately 770' South/ South East of the San Juan 28-6 #125 well pad. The approximate Latitude/Longitude of the spring is 36.647143° , -107.466682°





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<http://www.emnrd.state.nm.us/OCD/>

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**From:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Sent:** Friday, March 26, 2021 10:32 AM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>;  
Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>;  
Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** [EXT] RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Cory - Could you clarify which down gradient spring you are suggesting to be sampled? Please provide an approximate location or distance from the well pad, so we can ensure we are all talking about the correct spring. Thank you!

Kind regards,

*Lindsay Dosescu*  
Environmental Specialist  
Hilcorp Energy – L48 West

Office: 832-839-4585  
Mobile: 281-794-9159

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**From:** Lindsay Dumas  
**Sent:** Friday, March 26, 2021 11:04 AM  
**To:** Smith, Cory, EMNRD <[Cory.Smith@state.nm.us](mailto:Cory.Smith@state.nm.us)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Good Morning Cory – Hilcorp has reviewed your deficiencies outlined below and would like to discuss the items further in an in person meeting. Would everyone be available to meet in **Santa Fe on April 15<sup>th</sup> at 10AM**? I will follow this email with a meeting invitation as well.

Kind regards,

*Lindsay Dosescu*  
Environmental Specialist  
**Hilcorp Energy – L48 West**  
Office: 832-839-4585  
Mobile: 281-794-9159

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**From:** Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]  
**Sent:** Monday, March 15, 2021 11:29 AM  
**To:** Lindsay Dumas <[ldumas@hilcorp.com](mailto:ldumas@hilcorp.com)>  
**Cc:** Hernandez, Emily, EMNRD <[Emily.Hernandez@state.nm.us](mailto:Emily.Hernandez@state.nm.us)>; Polak, Tiffany, EMNRD <[Tiffany.Polak@state.nm.us](mailto:Tiffany.Polak@state.nm.us)>; Griswold, Jim, EMNRD <[Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)>; Powell, Brandon, EMNRD <[Brandon.Powell@state.nm.us](mailto:Brandon.Powell@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** [EXTERNAL] San Juan 28-6 Unit #125 incident# nRM2030132715

Ms. Dumas,

OCD has reviewed the Site Characterization and Remediation Plan for the San Juan 28-6 Unit #125 incident# nRM2030132715 submitted to the OCD on December 30, 2020 and has denied the report due to the following deficiencies:

1. The area downgradient of the suspected release source has not been sufficiently delineated. Therefore, OCD requests that additional delineation, pursuant to [19.15.29.11](#) NMAC, between BH-8 and BH-9.



2. The remediation plan provided did not provide adequate information to assess the effectiveness of the proposed SVE system. OCD requests that an SVE pilot test be performed to confirm the following:
  - a. Radius of effect/influence for proposed placement of SVE well locations,
  - b. That the length of the proposed screen intervals will be sufficient for effective remediation in both the shallow sands and deeper sandstones,
  - c. That the size of the required pump is sufficient to reach all impacted areas,
  - d. The potential for passive air inlets at specific depths for effective remediation.

Upon completion of the pilot test, OCD requests information regarding proposed zone runtimes and SVE maintenance schedules.

3. OCD requests a schematic of the SVE zones, SVE well construction, and SVE pump/knock-out-tank assembly – which were not include in the December 23<sup>rd</sup> Site Characterization and Remediation Plan.
4. Hilcorp’s depth to water assessment of greater than 100’ was found to be inaccurate. OCD review of ground water in the area indicates that depth to water could be less than or equal to 75’ at the San Juan 28-6 #125.
  - a. This data originated from a cathodic well report located at the San Juan 28-6 Unit #60 approximately 650’ north west.
  - b. Due to the historical nature of the release and the length of proposed remediation, OCD is requesting that the spring downgradient be sampled to established a baseline. The spring water should be analyzed for TDS, pH, Cation, Anion, BTEX (EPA 8260(Long list), TPH(EPA 8015)

1. Within the next two weeks Hilcorp will need to schedule a meeting with the OCD to discuss a proposed timeline that Hilcorp can acquired the required information for resubmission of the Site Characterization and Remediation plan. Upon completion of the meeting, the OCD will provide an updated version of this letter of deficiencies to include a timeline for submission to the OCD E-permitting portal.

Thank you,

**Cory Smith** • Environmental Specialist  
Environmental Bureau

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