

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Todd Yocham](#)  
**Cc:** [Groves, Amber](#); [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com); [aggie@penrocoil.com](mailto:aggie@penrocoil.com); [ECallahan@berkeleyoil-gas.com](mailto:ECallahan@berkeleyoil-gas.com)  
**Subject:** RE: Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans  
**Date:** Friday, December 8, 2017 2:04:00 PM  
**Attachments:** approved\_1RP4819\_Penroc State E14.pdf

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Dear Mr. Yocham:

NMOCD rejects the proposed delineation plan for 1RP-4802. Please review the Google Earth image from November 2017. The impacted area is larger than indicated in the workplan.

NMOCD will accept the proposed delineation plan for 1RP-4819.

Please be advised that for complete vertical delineation, soil samples analyzed by an accredited laboratory must demonstrate permissible levels of BTEX, TPH extended, and chlorides for at least 2 depths: depth obtained and depth maintained at least 5 feet further in depth. Permissible levels for horizontal and vertical delineation is 600 mg/kg.

Like approval from NMSLO is required. NMSLO may have additional stipulations.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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.

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**From:** Todd Yocham [<mailto:tyocham@desertproduction.com>]  
**Sent:** Wednesday, November 8, 2017 1:16 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Groves, Amber <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>; [mymerch@penrocoil.com](mailto:mymerch@penrocoil.com); [aggie@penrocoil.com](mailto:aggie@penrocoil.com); [ECallahan@berkeleyoil-gas.com](mailto:ECallahan@berkeleyoil-gas.com)  
**Subject:** Penroc Oil Corporation - State E 10 Strawn Tank Battery and State E 14 Soil Contamination Characterization Work Plans

Oil Conservation Division (OCD) – District 1  
1625 N. French Dr.

Hobbs, NM 88240

Attn: Olivia Yu

Ms. Yu,

Attached please find the submitted work plans for the characterization of impacts associated with the release of produced water and crude oil for the following Remediation Cases:

Remediation Case No. 1RP-4802

State E 10 Strawn Tank Battery

And

Remediation Case No. 1RP-4819

State E 14

Please let me know if you have any questions.

Thank you,

Todd

**Todd M. Yocham**

*Petroleum Engineer*

**C:432.770.0615**

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**Penroc Oil Corporation**

**1515 W Calle Sur, Suite 174**

**Hobbs, NM 88241**