

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Clifford Kirchof"](#)  
**Cc:** [Shoemaker, Mike](#); [Adam Calvin](#); [Delfino Escalante III](#); [Andrew Romo](#); [Bratcher, Mike, EMNRD](#); [Weaver, Crystal, EMNRD](#)  
**Subject:** RE: 1RP-4867 - Submittal of Proposed WorkPlan for Soil Delineation at the Trionyx Frac Pond T-25-S, R-31-E, Eddy County, New Mexico  
**Date:** Thursday, April 12, 2018 10:09:00 AM

---

Good morning Mr. Kirchof:

Thank you for the primary document regarding 1RP-4867. Is this a template for whichever environmental consultancy will be awarded to conduct the release characterization/delineation?

Please be advised that several additional details are necessary for assessment:

- Depth to groundwater evaluation: use NMOSE, USGS, and other available databases.
- Distance to nearest waterbody and wellheads: topographic maps for a preliminary evaluation is available on NMOCD website: OCD GIS
- All maps and figures must be scaled appropriately to the size of the release. Impacted area must be outlined and proposed delineation sample points marked, in relation to the release point, based on site assessment of representative pooling spots.
- All laboratory analyses should have accompanying data from field tests. Tabulate data to facilitate review.
- Caliche 'impermeable' layer is not an acceptable rationale for incompleteness of vertical delineation.

Please be advised that according to NMOCD database, this release occurred on State surface and mineral ownership. NMSLO can verify. All corresponding agencies must be included in all communications and submitted reports.

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.

---

**From:** Clifford Kirchof <CKirchof@tetrathec.com>  
**Sent:** Tuesday, March 20, 2018 1:56 PM

**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

**Cc:** Shoemaker, Mike <Mike.Shoemaker@dmv.com>; Adam Calvin <ACalvin@tetrathec.com>; Delfino Escalante III <D3Escalante@tetrathec.com>; Andrew Romo <aromo@tetrathec.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

**Subject:** 1RP-4867 - Submittal of Proposed WorkPlan for Soil Delineation at the Trionyx Frac Pond T-25-S, R-31-E, Eddy County, New Mexico

Ms. Olivia Yu

TETRA Technologies Inc. (TETRA), a contractor to Devon Energy Production Co, LP (6137) (Devon) wishes to submit a Proposed Delineation Workplan (Workplan) to the New Mexico Oil Conservation Division (NMOCD) to address the release at the Trionyx Frac Pond on October 24, 2017 (Case No. 1RP-4867). Attached is the proposed Workplan for your review and comments.

I have also copied Mike Bratcher, NMOCD because a similar release occurred from the same water source in District 2 (2RP-4543). We have submitted a similar Workplan to Mr. Bratcher for that release.

Should you have any questions or comments, please do not hesitate to contact me at 281-364-5116.

Best regards,  
cliff

**Clifford E Kirchof**  
**Environmental/Chemical Regulatory Compliance Manager**

TETRA Technologies, Inc.  
24955 Interstate 45 North  
The Woodlands, TX 77380  
Office: 281-364-5116  
Mobile: 832-434-0979  
[ckirchof@tetrathec.com](mailto:ckirchof@tetrathec.com)

Dedicated to the CØRE

