

**From:** Groves, Amber  
**To:** [andrew@rthicksconsult.com](mailto:andrew@rthicksconsult.com)  
**Cc:** [Yu, Olivia, EMNRD](#); [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [mattp@pride-energy.com](mailto:mattp@pride-energy.com); [Randall Hicks](#); [Billings, Bradford, EMNRD](#)  
**Subject:** Re: Pride Energy NM 87 State #001 (1RP-4624) and 1RP-4625  
**Date:** Thursday, January 4, 2018 6:59:16 PM

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Mr. Parker,

Please be advised that neither location has a NMOCD and NMSLO approved delineation plan at this time. Please revise both plans to include both agencies requests for approval before commencing sampling.

Thank you,

Amber Groves

Sent from my iPhone

On Jan 2, 2018, at 4:27 PM, "[andrew@rthicksconsult.com](mailto:andrew@rthicksconsult.com)" <[andrew@rthicksconsult.com](mailto:andrew@rthicksconsult.com)> wrote:

Ms. Yu:

This email serves as the 48 hour notice for proposed sampling at the above two locations. We will be conducting sampling activities on Monday Jan. 8<sup>th</sup> 2018.

Andrew Parker  
R.T. Hicks Consultants  
Durango Field Office  
Cell: (970) 570-9535

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**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["Groves, Amber"](#); ["Andrew Parker"](#)  
**Cc:** [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [mattp@pride-energy.com](mailto:mattp@pride-energy.com); ["Randall Hicks"](#); [Billings, Bradford, EMNRD](mailto:Billings, Bradford, EMNRD)  
**Subject:** RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)  
**Date:** Thursday, January 4, 2018 3:30:00 PM  
**Attachments:** image002.png  
image001.png

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Mr. Parker:

Please keep in mind that the purpose of a delineation plan is to characterize the current release and any previously unresolved releases on a specified lease. Therefore, NMOCD requires the following items for 1RP-4625 to move towards corrective remedial actions:

1. Despite the disagreement on the authoritative assessment of a playa, data from soil bores ensure that vertical delineation is completed. As the playa- or depressed area West of the tank battery- was considered affected, a soil bore will vertically characterize this portion of the release area.
2. To complete delineation for the 2017 release, in addition to the 4 proposed in Figure 2, NMOCD requires that one more trench location be established to the West of the tank battery.
3. To complete release characterization for the area outlined in Figure 3, at least 2 more trenches are required: 1 West of the Plugged SWD well and 1 to the center of the release area.
4. There is already a drilling rig on location, so the establishment of one or more soil bores is not impractical nor infeasible. Please be advised that additional soil bores may be necessary to complete vertical delineation of the historic release area (pre 2017).
5. Delineation sample locations should be no greater than 50 ft. apart. In a tabulated format or marked on an appropriately scaled map, include GPS coordinates for each sample location. Keep sample IDs consistent among the text, figures, tables, and laboratory reports.

Please confirm or inform for clarification.

Thanks,  
Olivia

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**From:** Groves, Amber [mailto:agroves@slo.state.nm.us]  
**Sent:** Tuesday, January 2, 2018 4:58 PM  
**To:** 'Andrew Parker' <andrew@rthicksconsult.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** taylorp@pride-energy.com; mattp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>  
**Subject:** RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Mr. Parker,

What is the rationale for the refusal to do a soil bore in the playa as it is stated that it is required by NMOCD? This area is very clearly a playa and NMSLO agrees with NMOCD's assessment in requiring

a borehole.

Thank you,

**Amber Groves**

*Remediation Specialist*

*Field Operations Division*

(575)392-3697

(575)263-3209 cell

New Mexico State Land Office

2827 N. Dal Paso Suite 117

Hobbs, NM 88240

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**From:** Andrew Parker [<mailto:andrew@rthicksconsult.com>]

**Sent:** Friday, December 29, 2017 12:44 PM

**To:** 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [mattp@pride-energy.com](mailto:mattp@pride-energy.com); 'Randall Hicks' <[r@rthicksconsult.com](mailto:r@rthicksconsult.com)>; Groves, Amber <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>; 'Billings, Bradford, EMNRD' <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Ms. Yu:

As we stated in the workplan, *"Pride Energy understands that additional actions may be necessary to supplement the data collected by the program outlined below."* Additional actions for horizontal and vertical delineation will be determined after a review of analytical data collected during the proposed sampling program. We believe the proposed trenches and borehole will provide adequate characterization to determine if further horizontal and vertical delineation of the 2017 and historic 2000 releases is necessary according .

In response to your concerns (blue and underlined text):

- As the release area includes the portion inside the berm for the tank battery, at least one sample location be established within the berm.  
We will relocate the 2017 southwest trench to within the bermed area.
- There is a discrepancy between the text and Figure 2. Sample trenches need to be established

to characterize the impacted area, although one or more sample trenches should also be outside of the impacted area for background data.

A 2017 aerial photograph clearly shows the release extent (see Figure 2 and below screenshot). The proposed trench locations shown on Figure 2 is within the 2017 release extent. We will use chloride field titration concentrations to determine if the proposed northeast trench is below 250 mg/kg chloride from the surface to approximately 12-ft. As stated above, additional delineation may be necessary.

- Due to the geology of a playa, NMOCD requires that a borehole, rather than a sample trench, be established for delineation.

Neither the USGS Topographic Map nor the Geologic Map of New Mexico references this area as a playa. The USA Wetland Inventory does not recognize this as a playa or wetland of any type. The Geologic Map of NM maps the area as Tertiary-Ogallala Formation. Regardless of the classification as a “playa” or not, trench sampling the area will provide characterization down to at least 12-feet. As stated in the introductory paragraph, further delineation may be required.

- The laboratory results from July 5, 2017, were for samples taken at the **well** not tank battery. Thank you for the clarification

...There is no aerial imagery from 2017 supporting the location of the proposed borehole. If in disagreement, please submit documentation. Based on the latest Google Earth imagery from September 30, 2014, NMOCD recommends that the proposed soil bore location be relocated to the north of the tank battery.

As stated in the workplan, the purpose of the proposed borehole is to vertically delineate the 2017 and historic 2000 release with one borehole. As shown on Figure 2 and reproduced below without the cross-hatching, the 2017 Bing Hybrid Map (source: esri.com) clearly shows the July 2017 release. The proposed borehole is on the southern edge of the release area. We will move the borehole north 20-feet to capture more of the 2017 release.



- For each sample location, at least 2 depths (depth obtained permissible levels and depth maintained at least 5 ft. further in depth) must be submitted for laboratory analyses of BTEX, TPH extended, and chlorides. All laboratory analyses must have accompanying field data.  
[Understood.](#)
- Please be advised that soil bore logs need to be included in the subsequent delineation report. Also, all sample locations need to be demarcated with GPS coordinates on an appropriately scaled map.  
[Understood.](#)

Andrew Parker  
R.T. Hicks Consultants  
Durango Field Office  
970-570-9535

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Thursday, December 28, 2017 8:20 AM  
**To:** Andrew Parker  
**Cc:** [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [mattp@pride-energy.com](mailto:mattp@pride-energy.com); Randall Hicks; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us); Billings, Bradford, EMNRD  
**Subject:** RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Mr. Parker:

Please address these concerns regarding the delineation workplan for 1RP-4625:

- As the release area includes the portion inside the berm for the tank battery, at least one

sample location be established within the berm.

- There is a discrepancy between the text and Figure 2. Sample trenches need to be established to characterize the impacted area, although one or more sample trenches should also be outside of the impacted area for background data.
- Due to the geology of a playa, NMOCD requires that a borehole, rather than a sample trench, be established for delineation.
- The laboratory results from July 5, 2017, were for samples taken at the **well** not tank battery. There is no aerial imagery from 2017 supporting the location of the proposed borehole. If in disagreement, please submit documentation. Based on the latest Google Earth imagery from September 30, 2014, NMOCD recommends that the proposed soil bore location be relocated to the north of the tank battery.
- For each sample location, at least 2 depths (depth obtained permissible levels and depth maintained at least 5 ft. further in depth) must be submitted for laboratory analyses of BTEX, TPH extended, and chlorides. All laboratory analyses must have accompanying field data.
- Please be advised that soil bore logs need to be included in the subsequent delineation report. Also, all sample locations need to be demarcated with GPS coordinates on an appropriately scaled map.

Please confirm or inform for clarification.

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:** Andrew Parker [<mailto:andrew@rthicksconsult.com>]  
**Sent:** Wednesday, December 27, 2017 5:58 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [mattp@pride-energy.com](mailto:mattp@pride-energy.com); Randall Hicks <[r@rthicksconsult.com](mailto:r@rthicksconsult.com)>; [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us); Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** RE: Pride Energy NM 87 State #001 Tank Battery (1RP-4625)

Ms. Yu:

Attached is a revised characterization plan for the above referenced site. A few items were clarified:

- Differentiation between NM 87 State #001 tank battery (1RP-4625) and NM 87 State #001 (1RP-4624) wellhead.
- Added a trench sampling point in the depression (“playa”) west-northwest of the tank battery per discussions with Ms. Groves (SLO).

The characterization plan for NM 87 State 001 (wellhead; 1RP-4624) will be submitted under a separate workplan. We plan to perform sampling on Jan 8<sup>th</sup>. I will email NMOCD/SLO 48-hours in advanced.

Andrew Parker  
R.T. Hicks Consultants  
Durango Field Office  
970-570-9535

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**From:** Andrew Parker [<mailto:andrew@rthicksconsult.com>]  
**Sent:** Thursday, December 14, 2017 10:00 AM  
**To:** 'Olivia.yu@state.nm.us'  
**Cc:** 'taylorp@pride-energy.com'; 'mattp@pride-energy.com'; Randall Hicks ([r@rthicksconsult.com](mailto:r@rthicksconsult.com)); 'agroves@slo.state.nm.us'; 'bradford.billings@state.nm.us'  
**Subject:** Pride Energy NM 83 State #001 Charactrization Plan (1RP-4625)

Ms. Yu:

On the behalf of Pride Energy, attached is the characterization plan for the above referenced location. We elected to characterize the 2017 release along with a historic release that occurred sometime between 1996 and 2003 per review of aerial photographs. The trench sample location showed evidence of the historic release at 12-feet below ground surface and is discussed further in the attached workplan.

I would like to conduct the field work mid-January. Please contact me at 970-570-9535 with any questions.

Andrew Parker  
R.T. Hicks Consultants  
Durango Field Office  
970-570-9535

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