

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Andrew Parker](#); [Mann, Ryan](#)  
**Cc:** [Billings, Bradford, EMNRD](#); [mnaranjo@slo.state.nm.us](mailto:mnaranjo@slo.state.nm.us); [matt@pride-energy.com](mailto:matt@pride-energy.com); [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); [Randall Hicks](#)  
**Subject:** RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624  
**Date:** Thursday, July 26, 2018 9:34:00 AM

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Good morning Mr. Parker:

The request for deferral for proposed remediation is denied for 1RP-4624. The historic and most recent release on this location abide by current regulation. Vertical delineation on the well pad- North and Southeast locations- must be completed before evaluation of proposed remediation.

NMSLO may have additional concerns and stipulations.

Thanks,  
Olivia

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**From:** Andrew Parker <[andrew@rthicksconsult.com](mailto:andrew@rthicksconsult.com)>  
**Sent:** Tuesday, June 26, 2018 5:28 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>; [mnaranjo@slo.state.nm.us](mailto:mnaranjo@slo.state.nm.us); [matt@pride-energy.com](mailto:matt@pride-energy.com); [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com); Randall Hicks <[r@rthicksconsult.com](mailto:r@rthicksconsult.com)>  
**Subject:** RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Attached is the characterization and remediation plan for Pride Energy's NM 87 State 001 (Wellhead) release. Please note that we ask NMOCD for a temporary deferment to the proposed restoration and remediation plan. The purpose of the request is to postpone remediation/restoration design until the final ruling of NMOCD's proposed application to repeal and replace Rule 19.15.29 NMAC (the Rule). The final ruling is expected to be delivered by the first week of August 2018.

Thank you,

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

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**From:** Andrew Parker [<mailto:andrew@rthicksconsult.com>]  
**Sent:** Wednesday, March 28, 2018 3:51 PM  
**To:** [Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
**Cc:** [bradford.billings@state.nm.us](mailto:bradford.billings@state.nm.us); [mnaranjo@slo.state.nm.us](mailto:mnaranjo@slo.state.nm.us); [matt@pride-energy.com](mailto:matt@pride-energy.com); [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com)

[energy.com](http://energy.com)

**Subject:** RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Please consider this the 48-hour advanced notice to perform characterization as outlined in our March 28, 2018 report submitted to Pride Energy with a copy to NMOCD. **We plan to arrive at the wellhead location late afternoon on April 2, 2018**, after completion of characterization at the tank battery location. We welcome NMOCD to observe the characterization and we are prepared to answer any questions NMOCD may have. Any person on-site will be required to have steel toe boots, ear protection, and hardhat as PPE.

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

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**From:** Andrew Parker [<mailto:andrew@rthicksconsult.com>]  
**Sent:** Wednesday, March 28, 2018 3:29 PM  
**To:** [mattp@pride-energy.com](mailto:mattp@pride-energy.com); [taylorp@pride-energy.com](mailto:taylorp@pride-energy.com)  
**Cc:** [bradford.billings@state.nm.us](mailto:bradford.billings@state.nm.us); [mnanarajo@slo.state.nm.us](mailto:mnanarajo@slo.state.nm.us); [Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
**Subject:** Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Mr. Pride:

Attached are the results of the first characterization plan and the proposed activities for the second characterization. Please note that NMAC 19.15.29 does not require NMOCD approval of characterization plans. After reviewing second characterization results, we will determine the best approach on whether to

1. Perform corrective actions under the current regulation, or
2. Ask for a variance using the proposed cleanup criteria levels as a guidance as discussed in the attached plan.

We plan on performing the second characterization on the afternoon of April 2, 2018. A notice to NMOCD will follow this email.

Per NMAC 19.15.29, the next formal submission to NMOCD is either a remediation (correction action) or closure plan – at which time NMOCD can either deny or approval the plan. The type of submission and path forward will be based on data collected during the characterization using standards and regulations in-place at the time. A formal variance may be requested at the time of formal submission to NMOCD.

Andrew Parker  
R.T. Hicks Consultants  
Durango Field Office

970-570-9535