

Please note that delineation for **1RP-4990** is still incomplete. NMOCD approves the proposed remediation for **1RP-4990**, however, please be advised that completion of delineation, while remediating, is considered conducted at-risk. Approval is also conditional based on the following: Excavation to 1' bgs at SP1, SP2, and SP4. Please be advised to excavate SP3 to 4' (or as practicably/feasibly possible). Bottom and sidewall confirmation samples from all sample locations at no greater than 50 ft. intervals. At least one confirmation sidewall/edge sample location must be at the border between each different depth of excavation, for example between SP2 (1' excavation) and SP3 (4' excavation). BTEX, TPH extended, and chlorides laboratory analyses for all confirmation samples. Marked confirmation sample locations in relation to delineation sample locations on a scaled map. Dated photo documentation of the remediation process. Please note, if any portion of the impacted release area is not remediated, based on practicability, feasibility, and/or safety reasons, then **1RP-4990** will at that time be considered for deferral rather than closure.



Carter Lease Well #001 Battery

APPROVED

By CHernandez at 1:57 pm, Jul 26, 2018

REMEDIATION WORK PLAN

API No. 30-025-30854

Release Date: March 12th, 2018

1-I Sec.30 T-19S-R 39E

NMOCD Case #: 1RP-4990

07/06/2018

Prepared by:

Michael Alves

Environmental Department

Diversified Field Service, Inc.

206 W. Snyder

Hobbs, NM 88240

Phone: (575)964-8394

Cell: (575)631-3364

Olivia Yu
Environmental Protection Specialist
New Mexico Oil Conservation District-Div.1
1625 N French Drive
Hobbs, NM 88240

RE: Sheridan Production Company, LLC – Carter Lease Well 001

Remediation Work Plan

1-I, Section 30, T-19-S, R-39-E

API No. 30-025-30854

NMOCD Case #: 1RP-4990

Ms. Yu,

Sheridan Production Company, LLC (Sheridan) has retained Diversified Environmental (DFSI) to address environmental issues for the site detailed herein.

The site is located northeast of Eunice, NM, in Lea County. The spill site resulted from an open top water tank running over. Approximately 3 barrels of oil and 60 barrels of water was released inside the bermed area. 2.5 bbl. oil /40 bbl. of water were recovered. An initial C-141 was submitted to NMOCD on March 12th, 2018. (Appendix I).

Site Assessment

On March 27th, 2018 DFSI personnel were on site to obtain samples within the leak area (Figure 1). Four sample points were set, then samples were obtained and field sampled for chloride levels, as well as BTEX (Appendix II). The BTEX samples were performed using a Mini Rae Photoionization Detector (PID). Clean field samples were submitted for laboratory analysis at Cardinal Laboratory of Hobbs, NM to obtain confirmation (Appendix III). Based on analysis, chlorides, TPH and BTEX did have a decline as samples were taken at deeper intervals. Sp1 was not able to be fully delineated due to auger refusal. Mechanical boring was not used due to safety issues with active production lines and the water tank obstructing the sampling area.

DFSI has conducted a groundwater study of the area and has determined, according to the New Mexico Office of the State Engineer, groundwater beneath this site is approximately at 72' (Appendix IV).

Conclusion

On 4/30/2018 NMOCD requested full delineation on SP1. On May 29th, 2018 DFSI personnel went to location and used a hydraulic drill to accomplish delineation. Regulatory limits were accomplished past 1' BGS and down to 4'. 10 additional feet were not able to be done due to the area design as seen in the pictures of location. Field tests are included in the appendix to show the decline in contaminates from surface to 4' BGS. Sp1 refers to release point as the tank spilled over from that point.

After careful review DFSI, on behalf of Sheridan, would like to propose the following:

Due to safety hazards, which include tanks and underground lines (as depicted in site photos) to maintain tank integrity, the entire release area will be excavated to a depth of 1' bgs. With sidewall lab confirmations before backfill is completed, and a new map documenting sidewalls will be presented to NMOCD/SLO for approval A 20ML liner will be placed and properly seated to insure contamination migration will not incur further and also prevent possible future incidents to not migrate past liner as well. The excavation will be backfilled with clean, imported caliche to ground surface and contoured to the surrounding area. Berms will be rebuilt and compacted as well. Seeding of the site is not warranted due to this location is a tank battery. Any additional remediation on this location would like to be deferred until site abandonment.

Following the approval of the above plan, DFSI will submit all proper closure documentation to the NMOCD in accordance to the State Guidelines set forth.

Please feel free to contact Michael Alves at 575-631-3364 or me with any questions concerning this remediation plan request.

Sincerely,



Michael Alves

Environmental/Dirt Work General Manager | Diversified Field Services, Inc.

206 West Snyder | Hobbs, NM 88240

Office: (575)964-8394 | Fax: (575)964-8396 | Email: malves@diversifiedfsi.com

Figures: Site Diagram

Appendices: Initial C-141
 Site Photos
 Laboratory Analysis
 Groundwater Study
 Field Data



Survey

Appendix I

INITIAL C-141

Diversified Field Service, Inc.
206 W. Snyder
Hobbs, NM 88240
(575) 964-8394

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised April 3, 2017

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Sheridan Production Company, LLC	Contact: Ed Hamblin
Address: 1602 W Broadway Andrews TX 79714	Telephone No.: 432.813.4831
Facility Name: Carter Lease Well No. 1 Battery	Facility Type: Oil Well Battery
Surface Owner: Fee	Mineral Owner: Private
API No.: 30-025-30854	

LOCATION OF RELEASE

Unit Letter 1-I	Section 30	Township 19S	Range 39E	Feet from the	North/South Line 1980 FSL	Feet from the	East/West Line 660 FEL	County LEA
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Latitude 32.6293526 Longitude -103.0784149 NAD83

NATURE OF RELEASE

Type of Release: Oil/Produced Water	Volume of Release: ~60 bbls	Volume Recovered: 40 bbls
Source of Release: Open-top produced water tank	Date and Hour of Occurrence: 03/10/2018 0400 AM	Date and Hour of Discovery: 03/10/2018 0700 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Hunter Yocham, Foreman, Sheridan	
By Whom? Seth Johnson, Sr. Pumper, Sheridan	Date and Hour: 03/10/2018 0920 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

RECEIVED

By Olivia Yu at 2:34 pm, Mar 12, 2018

Describe Cause of Problem and Remedial Action Taken.*



Open-top Produced Water tank ran over losing approximately 3 bbl oil / 60 bbl water with the bermed area. Increased fracking activity in the area have communicated with various wells in the vicinity.

Describe Area Affected and Cleanup Action Taken.*

A vacuum truck was mobilized and recovered approximately 2.5 bbl oil / 40 bbl water.

A local consulting firm has been contacted to coordinate the necessary remedial actions.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

 Signature:		OIL CONSERVATION DIVISION	
Printed Name: R Edward Hamblin		Approved by Environmental Specialist: 	
Title: EHS Coordinator	Approval Date: 3/12/2018	Expiration Date:	
E-mail Address: ed.hamblin@sheridanproduction.com	Conditions of Approval: see attached directive	Attached <input checked="" type="checkbox"/>	
Date: 03/12/2018	Phone: 432.813.4831		

1RP-4990

nOY1807152908

pOY1807153148

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 3/12/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 1RP-4990 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 1 office in Hobbs on or before 4/12/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

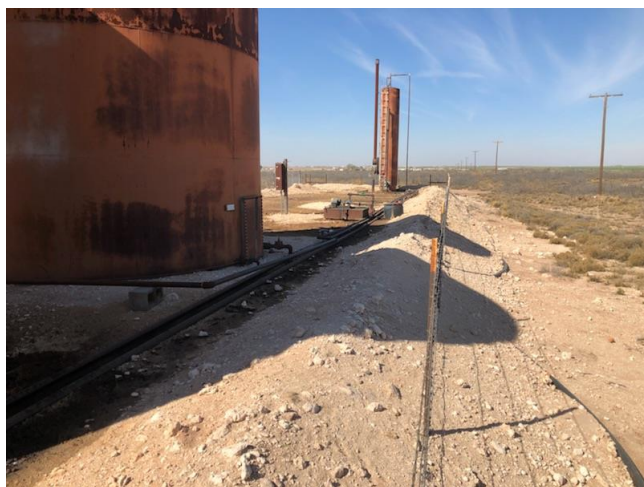
Jim Griswold

OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us

Appendix II

SITE PHOTOS

Site Photos:





Appendix III

LABORATORY ANALYSIS

Diversified Field Service, Inc.
206 W. Snyder
Hobbs, NM 88240
(575) 964-8394



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 30, 2018

MICHAEL ALVES

DIVERSIFIED FIELD SERVICES, INC.

P. O. BOX 5966

HOBBS, NM 88241

RE: SHERIDAN CARTER #001

Enclosed are the results of analyses for samples received by the laboratory on 05/29/18 14:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-17-10. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

DIVERSIFIED FIELD SERVICES, INC.
MICHAEL ALVES
P. O. BOX 5966
HOBBS NM, 88241
Fax To: (575) 393-2981

Received:	05/29/2018	Sampling Date:	05/24/2018
Reported:	05/30/2018	Sampling Type:	Soil
Project Name:	SHERIDAN CARTER #001	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	LEA CO NM		

Sample ID: SP1 @ 4' (H801459-01)

BTX 8021B			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/29/2018	ND	2.27	114	2.00	1.85	
Toluene*	<0.050	0.050	05/29/2018	ND	2.30	115	2.00	0.232	
Ethylbenzene*	<0.050	0.050	05/29/2018	ND	2.34	117	2.00	0.359	
Total Xylenes*	<0.150	0.150	05/29/2018	ND	6.86	114	6.00	0.572	
Total BTX	<0.300	0.300	05/29/2018	ND					

Surrogate: 4-Bromofluorobenzene (PID) 109 % 69.8-142

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	05/30/2018	ND	416	104	400	3.77	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/30/2018	ND	198	99.1	200	3.71	
DRO >C10-C28*	28.3	10.0	05/30/2018	ND	213	107	200	3.62	
EXT DRO >C28-C36	<10.0	10.0	05/30/2018	ND					

Surrogate: 1-Chlorooctane 81.9 % 41-142

Surrogate: 1-Chlorooctadecane 76.8 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-C

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

+ Cardinal cannot accept verbal changes Please for written changes to (575) 202-2226

Appendix IV

GROUNDWATER STUDY

Diversified Field Service, Inc.
206 W. Snyder
Hobbs, NM 88240
(575) 964-8394



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Depth Well	Depth Water	Water Column
L 05127	L	LE		4	1	3	30	19S	39E	679149	3611706*			
L 05127	R	L	LE	4	1	3	30	19S	39E	679149	3611706*			
L 05127 POD8	L	LE				3	30	19S	39E	679257	3611605*	117	90	27
L 05127 POD8	R	L	LE			3	30	19S	39E	679257	3611605*	117	90	27
L 05127 POD9	L	LE				3	30	19S	39E	679056	3611404*	115	58	57
L 05127 S	L	LE		2	2	3	30	19S	39E	679552	3611913*			
L 05127 S	R	L	LE	2	2	3	30	19S	39E	679552	3611913*			
L 05127 S2	L	LE		4	4	3	30	19S	39E	679558	3611310*	124	55	69
L 05127 S2	R	L	LE	4	4	3	30	19S	39E	679558	3611310*	124	55	69
L 09488	L	LE				3	30	19S	39E	679257	3611605*	112	80	32
L 09679	L	LE		4	3	3	30	19S	39E	679155	3611303*	100		
L 10163	L	LE			2	4	30	19S	39E	680257	3611828*	104	70	34
L 10399	L	LE			3	3	30	19S	39E	679056	3611404*	115		
L 11271	L	LE		4	3	3	30	19S	39E	679155	3611303*	112		
L 12204 POD1	L	LE		2	2	4	30	19S	39E	680304	3611891	165	80	85

Average Depth to Water: **72 feet**

Minimum Depth: **55 feet**

Maximum Depth: **90 feet**

Record Count: 15

Basin/County Search:

Basin: Lea County

County: Lea

PLSS Search:

Section(s): 30

Township: 19S

Range: 39E

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

Appendix V

FIELD DATA

Diversified Environmental Services

Company Name:	SHERIDAN
Location Name:	CARTER #001

SP Date: 3/26/2018;5/24/18
Rel Date:

[illegible]

	Lab Confirmation Sample
	Field Sampling
	Needs Delineation and confirmation samples

Diversified Environmental Services

[illegible]

	Lab Confirmation Sample
	Field Sampling
	Needs Delineation and confirmation samples

Diversified Environmental Services

[illegible]

	Lab Confirmation Sample
	Field Sampling
	Needs Delineation and confirmation samples

Diversified Environmental Services

[illegible]

	Lab Confirmation Sample
	Field Sampling
	Needs Delineation and confirmation samples

From: Michael Alves
To: [Hernandez, Christina, EMNRD](#)
Cc: [Yu, Olivia, EMNRD](#); [Kiara Walker](#); [Courtney Cowan](#)
Subject: Re: DFSI - Sheridan Carter #001 Redemption Work Plan
Date: Thursday, July 26, 2018 12:01:18 PM

Ms Hernandez,

We submitted all of that information with the original work plan. This revised plan was submitted with the conditions Ms. Yu had instilled. We will go ahead and add the original work plan into the revised work plan and resubmit.

Michael Alves
Enviromental/Dirt Works Operations Manager
5756313364

On Jul 26, 2018, at 12:56 PM, Hernandez, Christina, EMNRD
<Christina.Hernandez@state.nm.us> wrote:

Dear Mr. Alves:

At this time NMOCD cannot approve the delineation work or the proposed remediation work plan submitted for 1RP-4990 due to insufficient available data. At present only laboratory results for 1 sample location at 1 depth was submitted (SP1 at 4'). Chloride field tests alone are not sufficient to complete delineation due to their high variance and are generally encouraged as a guide. Please submit laboratory soil chloride analyses of all sample locations (SP1, SP2 SP3 and SP4). Additionally, the spill release consisted of produced water and crude oil and therefore Benzene, BTEX and TPH extended analyses are also required. Please include copies of the actual laboratory results including chain of custody documentation.

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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: Kiara Walker <kwalker@diversifiedfsi.com>
Sent: Friday, July 6, 2018 5:04 PM
To: Mann, Ryan <rmann@slo.state.nm.us>; Yu, Olivia, EMNRD
<Olivia.Yu@state.nm.us>
Cc: Michael Alves <malves@diversifiedfsi.com>; Courtney Cowan
<CCowan@diversifiedfsi.com>
Subject: DFSI - Sheridan Carter #001 Redemption Work Plan

Please see attachment per Michael Alves. Thank you! ☺

Have a wonderful and blessed day !!

*Kiara Walker
Billing Clerk
Diversified Field Services
Office: 575.397.6437
Fax: 575.393.2981*

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