

Bratcher, Mike, EMNRD

From: Amber Cannon <ACannon@yatespetroleum.com>
Sent: Friday, July 26, 2013 8:15 AM
To: Bratcher, Mike, EMNRD
Subject: RE: Dolores AIL Federal #1

Thanks Mike.

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Friday, July 26, 2013 8:14 AM
To: Amber Cannon
Subject: RE: Dolores AIL Federal #1

Amber – An overspray is going to be surficial anyway, so yes, I am fine with scraping it up.

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
O: 575-748-1283 X108
C: 575-626-0857
F: 575-748-9720

From: Amber Cannon [<mailto:ACannon@yatespetroleum.com>]
Sent: Thursday, July 25, 2013 2:24 PM
To: Bratcher, Mike, EMNRD
Subject: Dolores AIL Federal #1
Importance: High

Mike,

I have a quick question about one of the releases we talked about on Tuesday July 23rd. I completely forgot to mention this and just realized it today while putting things together for BLM.

At the Dolores AIL Federal #1 tin horn release, 4/21/2013, there was some overspray on the production pad. I did not sample this because it was overspray. Are you okay with me just scraping this section of the pad?

Thanks,

Amber Cannon

Environmental Regulatory Agent
Yates Petroleum Corporation
Office: (575) 748-4111
Cell: (575) 513-8799

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Bratcher, Mike, EMNRD

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Sent: Friday, July 26, 2013 8:14 AM
To: 'Amber Cannon'
Subject: RE: Dolores AIL Federal #1

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From: Van Curen, Jennifer <jvancure@blm.gov>
Sent: Wednesday, June 19, 2013 12:12 PM
To: Amber Cannon
Cc: Jim Amos; Bob Asher; Katie Parker; Lupe Carrasco; Bratcher, Mike, EMNRD; Jerry Blakley
Subject: Re: Dolores AIL Federal #1 (Battery)

Amber,

I don't feel that sampling at this point in the pipeline zone will give accurate information. I watched in surprise that the spill area was being distributed over the whole pipeline area when I was out to check on the Martha 6. This entire path is now part of the spill area and will be monitored. The mobility of the chlorides will increase with the freshly worked soil. If chlorides are found at the surface at any time, remediation will be required. Delineation results prior to new pipeline will still be required for our documentation and monitoring purposes. Delineation and remediation will still be required east and west of this pipeline, to include side of lease road and across the pad of the Dolores. The delineations samples for these areas will need to be included in the remediation plan for approval prior to start of work. The pad may just need to be scraped. A written plan submitted for approval is due by July 12, 2013 for both Dolores and Martha tin horns and the Martha facility event.

I will also need a plan for remediation of the leaking tanks inside the fire wall at the Dolores. Bottoms may need to be checked for integrity of storage capabilities.

Thanks.

BLM approval does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health, or the environment, or if the location fails to reclaim properly. In such an event that location does not re-vegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws/regulations.

JENNIFER E VAN CUREN
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On Wed, Jun 19, 2013 at 9:37 AM, Amber Cannon <ACannon@yatespetroleum.com> wrote:

Jennifer,

This email is in regards to the release that occurred at the tin horn by the Dolores AIL Federal #1 (Battery) on 4/21/2013.

Since the release and initial sampling of the release, Yates has had more releases along the same poly line(s) in the area. These separate releases have occurred due to new wells being drilled in the area which has created a substantial increase in our water production in the area. The existing poly lines were not in a condition to handle this increased water production. As a result of the old infrastructure and the reoccurring releases, Yates has been replacing the old poly lines in the area to prevent future releases. During the replacement of these lines, the primary affected area for this release has been blended by heavy equipment and surface impaction is no longer visible.

As a result of the blending by heavy equipment, Yates would like to resample this release area so that we may re-evaluate the impaction we have. Yates would then be able to provide BLM with a work plan and be able to move forward with the remediation of this release.

Thanks,

Amber Cannon

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Bratcher, Mike, EMNRD

From: Van Curen, Jennifer <jvancure@blm.gov>
Sent: Friday, July 26, 2013 12:51 PM
To: Amber Cannon
Cc: Jim Amos; Bob Asher; Katie Parker; Bratcher, Mike, EMNRD
Subject: Re: Dolores AIL Federal #1 Tin Horn Release 4/21/2013

Amber,

I understand the sample as being only one sample point somewhere in the spill zone with no horizontal delineation. I also know from my two inspections, that were on the surface prior to pipeline disturbance and the rain. Also the well pad contaminants are from a flow path not over spray. The over spray went to the east into the pasture and the flow went in two different patterns: one in front of the facility and the other down the road edge, across road to the center and the north side of the well pad running south of the pump jack and back towards the heater treater equipment. This area will need to be tested for chlorides and removed. Scraping will not be sufficient. I did visit with Mike Bratcher, and he was not able to complete an onsite to be aware of flow areas vs. spray areas so depended on information given to him.

I realize that the samples will be corrupt due to the rains and disturbance of soils, and I don't want Yates to do any further dig and haul than necessary. BLM requires vertical and horizontal delineation to take place of spill sites especially in special areas (LPC, SDL, shinnery oak). This would include to the east, west, and north of tin horn and also the well pad. The well pad area should come back with accurate chloride levels due to the type of material and will need to be cleaned up to background levels. The area in the sandy soils will need to be cleaned up to 4' (21,200 chloride level too high), a liner, clay bottom, or caliche base to prevent migration of chlorides, and back fill.

I would approve a 2 month wait on taking these samples to see if the chlorides migrated up to prevent any further removal than what Yates would need to do. If Yates feels that these chlorides will migrate horizontally and cause more disturbance if waiting, than Yates can begin with removal of contaminants at a sooner date.

Thanks,

JENNIFER E VAN CUREN
ENVIRONMENTAL PROTECTION SPECIALIST
DOI-BLM-CARLSBAD FIELD OFFICE
320 E GREENE ST. CARLSBAD, NM 88220
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On Fri, Jul 26, 2013 at 8:54 AM, Amber Cannon <ACannon@yatespetroleum.com> wrote:

Jennifer,

Please find attached a scope of work, site diagram and analytical results for the Dolores AIL Federal #1 tin horn release that occurred on 4/21/2013.

Your concern that there are leaking tanks will be addressed separately from this release. I have once again passed the information on to our production department so that they can look into the matter.

Your quick response on the Dolores Tin Horn release is greatly appreciated.

Thank you,

Amber Cannon

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Bratcher, Mike, EMNRD

From: Amber Cannon <ACannon@yatespetroleum.com>
Sent: Friday, July 26, 2013 1:42 PM
To: Van Curen, Jennifer
Cc: Jim Amos; Bob Asher; Katie Parker; Bratcher, Mike, EMNRD
Subject: RE: Dolores AIL Federal #1 Tin Horn Release 4/21/2013

Jennifer,

When I conducted my initial inspection after this release, to me it appeared that what was on the pad site was from overspray. We obviously saw the release differently. I am more than willing to meet you on location one day next week so that we can walk through the release together and discuss what we both saw.

Yates Petroleum gave the opportunity for you to witness sampling that occurred on July 11th, 2013 at this location, along with the Martha releases. You did not show up to the sampling events, so we sampled where we felt was necessary based off of what we saw for each release. If we need to discuss this further for each location I will once again meet you on location next week so that we may walk through all of these releases and get on the same page.

Amber Cannon

From: Van Curen, Jennifer [mailto:jvancure@blm.gov]
Sent: Friday, July 26, 2013 12:51 PM
To: Amber Cannon
Cc: Jim Amos; Bob Asher; Katie Parker; Bratcher, Mike, EMNRD (mike.bratcher@state.nm.us)
Subject: Re: Dolores AIL Federal #1 Tin Horn Release 4/21/2013

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Bratcher, Mike, EMNRD

From: Van Curen, Jennifer <jvancure@blm.gov>
Sent: Monday, July 29, 2013 8:08 AM
To: Amber Cannon
Cc: Jim Amos; Bob Asher; Katie Parker; Bratcher, Mike, EMNRD
Subject: Re: Dolores AIL Federal #1 Tin Horn Release 4/21/2013

Amber,

If there are other sample points taken other than the one point for each, than please send them to me, so I am able to complete a full evaluation. Otherwise, decision will remain the same for more sampling to determine horizontal (side walls) and bottoms. I am not able to make every sampling, but when I am not able to make it, I still expect full evaluation sampling to be completed. This is not new, and Yates usually completes good sampling across the spill areas. This has also been discussed in previous emails. One that comes to mind is on June 11th, 2013. Nothing has changed.

There are two options to every sampling.

- 1 Samples can be taken at different sample points and to a depth to show bottom of contaminants have been found.
- 2 Remove contaminants to a depth that you believe is the depth of impact and then test multiple bottoms and side walls. If contaminants still exist, the process is repeated until results are achieved with removing the contaminants resulting from the spill.

When I perform my onsite they also consist of talking to people who are in the area to see what happened. I knew that was run on due to one of the persons that was questioned on the event. I also have photos the day after to show the fingers of the run on. Sprays do not finger out. Sprays do not run in a nice path along the ditch line of the road and when it encounters a low spot, run across to the other side. The way I look at it is sprays do not discriminate against the surface that it affects. Run ons and Run offs do by finding the weakest or least resistance to flow.

If you have any further questions please let me know.

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On Fri, Jul 26, 2013 at 1:41 PM, Amber Cannon <ACannon@yatespetroleum.com> wrote:

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Bratcher, Mike, EMNRD

From: Amber Cannon <ACannon@yatespetroleum.com>
Sent: Monday, August 12, 2013 12:52 PM
To: Jim Amos; Bratcher, Mike, EMNRD
Cc: Bob Asher; Katie Parker
Subject: 8/8/2013 On-Site with BLM/NMOCD

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Jim/Mike,

Sorry for the delay in getting the re-cap to you from last week's on-site meetings at the Martha/Dolores locations, a family emergency came up. Below you will find Yates comments. If you find anything to be out of line from what we discussed, please let me know.

Yates will give at least a 24-hour notice to both BLM and NMOCD before any further sampling occurs at these locations.

If you both agree on what is stated below (please respond one way or the other), I will be putting this information into updated work plans and will submit to both BLM and NMOCD.

Jim, Yates was under the impression that you will be handling these releases from this point forward so all further communications will be sent directly to you.

August 8, 2013 On-Site Meetings with BLM and NMOCD
Present: Jim Amos, Mike Bratcher, Bob Asher, Amber Cannon

Martha AIK Federal #6 Tin Horn

BLM requested that 2' be excavated from the field to the southwest of the tin horn. Upon completion of excavation he would like Yates to give notice for witness sampling along the side walls, composite sample from each wall – total of 4 samples. Even though we can clearly see where the release stopped, BLM wants confirmation samples to make sure that Yates gets all chloride contamination out so that we don't have to in years to come.

BLM requested that two extra delineation samples be taken – One sample to be taken alongside the lease road where the release traveled before pooling in the field. And one to be taken near the tin horn. Once we receive analytical results from these two areas, we can talk with BLM about leaving/excavating what we find.

NMOCD was okay with these requests.

Martha AIK Federal #1 Tin Horn

Yates stated concerns about the gas line. BLM still wants us to excavate 2' from section 1 and 3' from section 2 of the release area. Upon completion of excavation he would like Yates to give notice for witness sampling along the side walls, composite sample from each wall – total of 4 samples. Even though we can clearly see where the release stopped, BLM wants confirmation samples to make sure that Yates gets all chloride contamination out so that we don't have to in years to come.

NMOCD was okay with these requests.

Martha AIK Federal #1 Battery/Field Releases

Further vertical delineation sampling was requested from both BLM and NMOCD to see where vertical chloride contamination stops. Once vertical delineation sampling has been conducted and we have received analytical results, we will discuss further scope of work and how to proceed with clean-up.

Both BLM and NMOCD asked Yates to take out as much as possible from inside the battery area. They said to only take what we can safely. They then said we could put a new caliche layer inside the battery. If chloride issues arise in this area when the battery is abandoned, we would need to address the issue then.

Dolores AIL Federal #1 Tin Horn

It was requested that more samples be taken on the east side of the tin horn, alongside the lease road where the release flowed, and two from the production pad. Once vertical delineation sampling has been conducted and we have received analytical results, we will discuss further scope of work and how to proceed with clean-up.

NMOCD was okay with these requests.

Amber Cannon

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