

From: andrew@rthicksconsult.com
To: [Eads, Cristina, EMNRD](#)
Cc: ["Jacob Saenz"; "David Harwell"](#)
Subject: RE: [EXT] RE: Merchant State Unit 551H Proposed Sample Base Sample Grid Size
Date: Friday, May 15, 2020 10:10:46 AM
Attachments: [image001.png](#)

Cristina,

Thank you for revisiting the base sample size and expanding to an area of no more than 1200 sq. ft.

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

From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Sent: Friday, May 15, 2020 9:46 AM
To: andrew@rthicksconsult.com
Subject: RE: [EXT] RE: Merchant State Unit 551H Proposed Sample Base Sample Grid Size

Andrew,

As we discussed over the phone, during a conversation with OCD staff regarding the base sample frequency, it was decided composite base samples shall not represent an area of more than 1200 square feet. All other requirements remain as stated in my previous email to you, included in this email string.

Please let me know if you have any questions.

Thanks,

Cristina Eads | 505-670-5601

From: andrew@rthicksconsult.com <andrew@rthicksconsult.com>
Sent: Monday, May 11, 2020 10:18 AM
To: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: 'David Harwell' <DHarwell@advanceenergypartners.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: RE: [EXT] RE: Merchant State Unit 551H Proposed Sample Base Sample Grid Size

Cristina:

Thanks for the confirmation.

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

From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Sent: Monday, May 11, 2020 9:47 AM
To: andrew@rthicksconsult.com
Cc: 'David Harwell' <DHarwell@advanceenergypartners.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: RE: [EXT] RE: Merchant State Unit 551H Proposed Sample Base Sample Grid Size

Andrew, thanks for the photos.

The confirmation composite base samples shall not represent an area greater than 500 square feet. Confirmation composite sidewall samples shall not represent an area greater than 200 square feet. The OCD will allow for 75% of samples to be analyze for Benzene and TPH, and 100% to be analyzed for Chloride.

As for a deferral request, any areas where contamination is expected to be left in place must be completely delineated before OCD will consider granting approval of the request.

Please let me know if you have any questions, or if you need to discuss this incident in further detail.

Thanks,
Cristina

Cristina Eads | 505-670-5601

From: andrew@rthicksconsult.com <andrew@rthicksconsult.com>
Sent: Friday, May 8, 2020 9:27 AM
To: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Cc: 'David Harwell' <DHarwell@advanceenergypartners.com>
Subject: [EXT] RE: Merchant State Unit 551H Proposed Sample Base Sample Grid Size

Cristina:

Attached are a few photos of the excavation. More photos at

<https://rthicks.egnyte.com/fl/Fw9JiBLP7z>

Accessible until May 22, 2020

Thanks for evaluating a larger sample grid size for the base.

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

From: andrew@rthicksconsult.com <andrew@rthicksconsult.com>
Sent: Thursday, May 7, 2020 12:17 PM
To: 'Eads, Cristina, EMNRD' <Cristina.Eads@state.nm.us>
Cc: 'David Harwell' <DHarwell@advanceenergypartners.com>
Subject: Merchant State Unit 551H Proposed Sample Base Sample Grid Size
Importance: High

Cristina:

Per our phone conversation:

- Attached is the C-141. Advance Energy Partners may not have filed this at the beginning of April. In any event, AEP re-submitted today via the fee portal. Attached is the PO #.
- Attached is a map of the release extent relative to
 - Release Extent
 - EM Survey
 - Current Excavation Extent
 - Proposed Sample Grid Size Comparison.

As shown on the map, the EM Survey shows areas of concern (yellow to red shading) at depths down to 4.5 feet beyond the release extent. These areas of concern correlate with areas of elevated chloride concentrations relative to background concentrations. Some areas identified are caused by metal interference that will be described in the closure report. As shown, the current excavation extent is well beyond the initial release extent reported on the C-141. The observed impact beyond the release extent was likely caused from drilling and completion operations that occurred within the past last year.

Excavation depth is to 4.3 ft below production pad surface unless otherwise noted. The north edge of the pad is cut 4-feet below ground surface. Therefore, two areas north of the production pad that required remediation is noted as 0 to +4 ft, where +4ft is the level of the natural ground surface north of the production pad.

To date, approximately 9,000 cu. Yrds of material has been excavated. The cost to the remediation is likely to exceed \$1M.

Considering the large excavation extent and associated costs, we ask the NMOCD to approve a confirmation base sampling grid not to exceed 1200 sq. ft (34.5 x 34.5 ft). See attached map for base grid size comparison. Each base sample will be comprised of a 5-point composite. The constituent of concern is chloride (produced water). Therefore we ask NMOCD to allow for seventy-five percent (75%) of the samples to be analyzed for TPH and Benzene. All samples will be analyzed for chloride.

Additionally, we have been field screening for electrical conductivity during excavation activities. Excavation continued until EC < 0.2 dS/m in the upper 4-feet, which correlates with a chloride concentration of < 600 mg/kg. The area north of the three west wellheads may require deferment. The central southeast area may require additional characterization.

Please call me with any questions or interpretation of the map.

We will begin sampling on Monday May 11th.

Thank you for your consideration.

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

From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Sent: Thursday, May 7, 2020 9:48 AM
To: andrew@rthicksconsult.com
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Subject: NRM2000358734 WOOL HEAD 20 STATE COM #003 BATTERY @ 30-025-42142

NRM2000358734 WOOL HEAD 20 STATE COM #003 BATTERY @ 30-025-42142

Andrew,
The OCD has approved the Final C-141 for incident # NRM2000358734. No further action is required at this time and the signed C-141 can be found in the online image data base under the incident #

Thanks,

Cristina Eads

Environmental Bureau
EMNRD – Oil Conservation Division
5200 Oakland Avenue NE, Suite 100
Albuquerque, New Mexico 87113
505.670-5601
email: Cristina.Eads@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 groundwater, 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, or local laws and/or regulations.

