

Collins, Karen, EMNRD

From: Billings, Bradford, EMNRD
Sent: Monday, October 19, 2020 2:53 PM
To: 'Aaron Pachlhofer'
Subject: RE: 1RP-2197 - Incident Identification nBGB2029352696

10/19/2020

Fasken Oil
Aaron Pachlhofer

RE: 1RP-2197 - Incident Identification nBGB2029352696

The above release is now closed in OCD data base. It may take some time for this to appear in imaging file but the release is closed. As no incident number could be found, one was initiated by me and is the above "n" number.

Please keep this communication for your filed as no PAPER copy will follow.

Thank you for your efforts.

Sincerely,

Bradford Billings
EMNRD/OCD
E.Spec.A

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: Aaron Pachlhofer <aaronp@forl.com>
Sent: Monday, October 19, 2020 11:56 AM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] RE: 1RP-2197

Brad,

Sorry for the delay...I've been pretty busy.

You might recall that we agreed to collect a sample from the NW corner of the spill area for TPH...if it cleared then it would close. Please also note that we have recently closed a more recent spill at this battery. It is incident number

NCS2003132855. I can send my file copy to you, but I can't attach with everything else here due to the file size. I know it is available on the OCD file server.

For 1RP-2197 I am attaching the following information:

1RP-2197 data packet as originally submitted to you in Santa Fe (I gave you a hard copy)

PBEL lab report #9B7006

Please let me know what else I can do here.

From: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

Sent: Friday, October 02, 2020 3:33 PM

To: Aaron Pachlhofer <aaronp@forl.com>

Subject: RE: Sites/Numerous Closures and Deferrals - Two questions

Hi Aaron,

Please send data on 2197 and if possible the tech file on 4232. I know it is an ask, but... if you can get to me quickly (early next week, I will have answers for you next week. Thanks and stay safe.

Bradford

From: Aaron Pachlhofer <aaronp@forl.com>

Sent: Friday, October 2, 2020 2:08 PM

To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>

Subject: [EXT] FW: Sites/Numerous Closures and Deferrals - Two questions

Gents,

Since there is a considerable email chain, here are the two questions that I asked on March 12th:

1. For 1RP-2197, you have this listed as deferred, not closed. In our meeting in Santa Fe, you asked for a sample to be collected to confirm that no TPH was present at this location. The lab results were uploaded through the FTP. If not, I have them available for you.
2. 1RP-4232 is missing from the list. I show that it was to be deferred. In the list of deferred sites, you have 1RP-1825 twice, so this appears to be a simple typo, but I thought I would confirm with you.

Thanks,

Aaron

From: Aaron Pachlhofer
Sent: Friday, July 24, 2020 11:43 AM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: RE: Sites/Numerous Closures and Deferrals - Two questions

Brad,

I thought I might re-send this email since it has been since March 30th. I hope you are well.

Thanks,

Aaron Pachlhofer

From: Aaron Pachlhofer
Sent: Monday, March 30, 2020 3:34 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: RE: Sites/Numerous Closures and Deferrals - Two questions

Brad,

I know the world has gone crazy. However please try to have a look at the two notes below.

Thanks,

Aaron

From: Aaron Pachlhofer
Sent: Thursday, March 12, 2020 2:59 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: Sites/Numerous Closures and Deferrals - Two questions
Importance: High

Brad, two quick questions:

1. For 1RP-2197, you have this listed as deferred, not closed. In our meeting in Santa Fe, you asked for a sample to be collected to confirm that no TPH was present at this location. The lab results were uploaded through the FTP. If not, I have them available for you.
2. 1RP-4232 is missing from the list. I show that it was to be deferred. In the list of deferred sites, you have 1RP-1825 twice, so this appears to be a simple typo, but I thought I would confirm with you.

Please let me know ASAP on these!

Thanks,



Aaron Pachlhofer, P.G.
Environmental Coordinator
Fasken Oil and Ranch, Ltd.
6101 Holiday Hill Road
Midland, TX 79707
432-687-1777 Office
830-377-9190 Cell

From: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Sent: Monday, March 09, 2020 5:01 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Sites/Numerous Closures and Deferrals

No more squeaky than the rest, I just have thousands to do.

Brad

From: Aaron Pachlhofer <aaronp@forl.com>
Sent: Monday, March 9, 2020 2:30 PM
To: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] RE: Sites/Numerous Closures and Deferrals

Brad, I will double check my list of RP numbers and let you know if there is anything left off the list. I appreciate that you got to us and got everything reviewed. Sorry to have bugged you, but sometimes you have to be the squeaky wheel....



Aaron Pachlhofer, P.G.
Environmental Coordinator
Fasken Oil and Ranch, Ltd.
6101 Holiday Hill Road
Midland, TX 79707
432-687-1777 Office

830-377-9190 Cell

From: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Sent: Monday, March 09, 2020 3:26 PM
To: Aaron Pachlhofer <aaronp@forl.com>
Subject: RE: Sites/Numerous Closures and Deferrals

3/9/3030

Aaron Pachlhofer – Fasken

Below are site listings, either closed or deferred at this time by the Oil Conservation Division (OCD). As you know, the files available and offered by Fasken for these Fasken issues were/are often in disarray and it took some considerable time to piece many aspects of them together to make sense and attain decision level accountability. The OCD is sure you are aware, that certain field and report activities that may have been allowed in the past, with current Rule structure would not be acceptable. As much latitude as possible has been used in our considerations/determinations.

It may take some time for the current catalog of sites and the decisions made on them to be uploaded into OCD data base, but it will be done as soon as possible.

Sites APROVED for Closure: 2R-4901, 1R's -1064, -1301, -2932, -3495, -3602, -3631, -1393, -1513, -5041, 2915, 934, 5402, 475, 2259, 2283 and 4169.

Sites APPROVED for Deferral: 1R's -2197, 1090, 1825, 4298 and 1825.

These decisions are in general agreement with our last meeting. I believe this accommodates all the Fasken sites that we had discussions about. Please keep in mind, that Fasken will still be responsible to Section 13 (dealing with restoration) even with closure in hand.

Thank you for your patience.

Sincerely,

Bradford Billings
EMNRD/OCD
Santa Fe, NM

NOTE: The OCD will be opening an office in Albuquerque, NM this week. I will be in that office. By next week information will likely be on OCD website regarding address and new telephone numbers.

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