

From: Patterson, Heather, EMNRD
To: ["Bob Allen"](#)
Cc: [Rebecca Pons](#); [Brett Fulks](#); [Bratcher, Mike, EMNRD](#); [Shelly Tucker](#); [Bayliss, Randolph, EMNRD](#)
Subject: RE: API 30-015-42426 Work Plan
Date: Wednesday, June 08, 2016 7:14:00 AM

Bob,

It is not for the OCD to determine SESI's or Devon's safety standards. The question is, once you apply your safety standards, what is left to excavate? Another question is, since these are high pressure water lines, can they be temporarily shut it? Therefore eliminating the pressure.

Regardless, we still need a vertical delineation at this location. Then we can determine whether this will be a deferment or not.

Heather Patterson
Environmental Specialist
NMOCD District II
Office (575)748-1283 ext.101
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From: Bob Allen [mailto:ballen@sesi-nm.com]
Sent: Tuesday, June 07, 2016 1:56 PM
To: Patterson, Heather, EMNRD
Cc: Rebecca Pons; Brett Fulks; Bratcher, Mike, EMNRD; Shelly Tucker; Bayliss, Randolph, EMNRD
Subject: Re: API 30-015-42426 Work Plan

How far from the high pressure line is acceptable to the NMOCD?

Bob Allen CSP, CHMM
Office. 575-397-0510
Cell 575-390-7063

On Jun 7, 2016, at 2:36 PM, Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us> wrote:

RE: Devon Energy * Cotton Draw Unit #172H * 30-015-42426 * 2RP-3683

Rebecca,

The OCD cannot approve a work plan before it is fully delineated. I also have a question about the 10' buffer Devon is requesting. Once this is applied, what, if anything, is left for excavation? According to my measurements, the entire spill area is within the 10' buffer.

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.

If you have any questions or concerns, and for notification, please contact me.

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From: Rebecca Pons [<mailto:office2@sesi-nm.com>]
Sent: Thursday, June 02, 2016 8:32 AM
To: Patterson, Heather, EMNRD; Tucker, Shelly
Cc: ballen@sesi-nm.com; Brett Fulks
Subject: API 30-015-42426 Work Plan

Good Morning,

I have attached the Delineation Report and Work Plan for the Devon Cotton Draw 172H. Please note: In the Right of Way on this location there are high pressure pipelines. We prefer to leave these areas undisturbed within 10' of all directions. Please review and let me know if you concur or should you have any questions or concerns.

Thank You

Rebecca Pons

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