

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** "[Sheldon Hitchcock](#)"; [Jennifer Knowlton](#); [Naranjo, Mark](#); [Griswold, Jim, EMNRD](#)  
**Cc:** [Rebecca Haskell](#); [Dakota Neel](#); [Maurice Foye](#); [Honea, Tammy](#); [Mann, Ryan](#); [Bratcher, Mike, EMNRD](#)  
**Subject:** RE: Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313  
**Date:** Thursday, April 26, 2018 1:10:00 PM

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RE: COG \* SRO State COM #13H \* 30-015-37427 \* 2RP-4313 and 2RP-4328

Sheldon,

As it stands this work plan remains denied until adequate sampling efforts are conducted. The sampling done for these releases has been deemed by OCD to be inadequate as many sampling efforts in the past have been for many operators. Hence why the spill rule is in the process of trying to be revised, and also hence why the OCD COA document came out for distribution. So to say that because it got approved in the past it should get approved now is not actually applicable.

Also what happened within the battery portion of this release was failed to be mentioned till I had to inquire about it.

If you would like to raise any further concerns with this decision please feel to contact Jim Griswold OCD Environmental Bureau Chief out of Santa Fe. I have included him within this email so as to notify him on what I have mentioned.

Thank you,

## Crystal Weaver

Environmental Specialist  
OCD – Artesia District II  
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Artesia, NM 88210  
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**From:** Sheldon Hitchcock <SLHitchcock@concho.com>  
**Sent:** Wednesday, April 25, 2018 12:59 PM  
**To:** Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Jennifer Knowlton <jknowlton@hrlcomp.com>; Naranjo, Mark <MNaranjo@slo.state.nm.us>  
**Cc:** Rebecca Haskell <RHaskell@concho.com>; Dakota Neel <DNeel2@concho.com>; Maurice Foye <mfoye@hrlcomp.com>; Honea, Tammy <thonea@slo.state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>  
**Subject:** RE: Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313

Ms. Weaver,

I have addressed your points below.

- An outline showing the parameters for each spill impact of 2RP-4313 and 2RP-4328 would be helpful unless both spills are in fact an exact overlap.
  - The spills were in the same area of the pasture. The overall impacted area is represented in the site map.
- One sample point within the area of the spill is not adequate representation of portraying the impact accumulation especially based on a site where COG indicates a net loss of 24bbls occurred.
  - What is OCD's guideline on sample points per barrel released? T-1 is approximately 30' from each clean horizontal delineation sample. I believe the impacts were adequately investigated.
- Sample testing is inadequate. You must start testing for all required constituents mentioned in OCD's COA document at each sample point till they show clean or at least check at more than just the one sample point on all constituents.
  - This was a PW only release and surface within the impacted area (worst case location) did not have any hydrocarbon hits. In the past OCD hasn't been overly concerned with running TPH & BTEX at every sample location and/or every sample when there is no basis for the extra analyticals. Especially when the horizontal delineation samples don't even show elevated levels of the primary constituent that we are concerned with.
- Also the first release involved what was stated as a lightning strike which hit a tank and caused tank overflow. What has been done regarding resolution of the tank battery area? Would not some of the release impact the fill material that is within the lined battery area? Was the liner inspected to verify it held its integrity? Was the liner impacted by the lightning strike? Please address these matters.
  - The majority of the fluid remained inside of the battery berms. The impacted gravel was removed. I have attached a couple of pictures. It is my understanding the fluid that impacted the pasture was essentially overspray from the hole that was created in the top of the tank due to the lightning strike.
- Also for this site I show it having a lower elevation (3032 ft elev.) than a well that is documented by USGS as 320230104060601 (3048 ft. elev.) that has a depth to ground water of 17.52ft and is almost as equally far away on the west side from the spill site location as a number of the wells that OSE documents as showing depth to water on the east side of spill site location at around the 120ft depth (OSE well number C-2160 etc.). Also the area that the

well pad is in proximity to what appears to be a drainage feature that has not only what appears to be an association to an ephemeral playa but also feeds as a water drainage source to the Delaware River which runs east to west and is directly south of the well site location.

- Thus likelihood of encountering shallow ground water for this location is high. Therefore, OCD will have to override the site ranking and give this site a site ranking of at least a 10, therefore changing target action clean up levels.
  - I don't have an issue with making this a site ranking of 10 as it will not affect the remediation for 2RP-4313 & 2RP-4328.

Given the above clarifications I respectfully request that you approve the work plan. Please let me know if you have any additional concerns.

Thank you,

Sheldon L. Hitchcock  
HSE Coordinator  
COG Operating LLC  
2407 Pecos Avenue | Artesia, NM 88210  
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**From:** Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]  
**Sent:** Tuesday, April 24, 2018 3:43 PM  
**To:** Jennifer Knowlton; Naranjo, Mark  
**Cc:** Sheldon Hitchcock; Rebecca Haskell; Dakota Neel; Maurice Foye; Honea, Tammy; Mann, Ryan  
**Subject:** [External] RE: Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313

\*\*\*\* External email. Use caution. \*\*\*\*

RE: COG \* SRO State COM #13H \* 30-015-37427 \* 2RP-4313 and 2RP-4328

Hello all,

Jennifer thank you for the submission of this work plan, however, OCD would like to start with saying it may be best that yourself, and any other participating members of HRL Compliance Solutions that contributed to this work plan, get with COG members, mentioned above, on what they are aware of that OCD expects within a work plan.

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- One sample point within the area of the spill is not adequate representation of portraying the impact accumulation especially based on a site where COG indicates a net loss of 24bbbls occurred.
- Sample testing is inadequate. You must start testing for all required constituents mentioned in OCD's COA document at each sample point till they show clean or at least check at more than just the one sample point on all constituents.
- Also the first release involved what was stated as a lightning strike which hit a tank and caused tank overflow. What has been done regarding resolution of the tank battery area? Would not some of the release impact the fill material that is within the lined battery area? Was the liner inspected to verify it held its integrity? Was the liner impacted by the lightning strike? Please address these matters.

Also for this site I show it having a lower elevation (3032 ft elev.) than a well that is documented by USGS as 320230104060601 (3048 ft. elev.) that has a depth to ground water of 17.52ft and is almost as equally far away on the west side from the spill site location as a number of the wells that OSE documents as showing depth to water on the east side of spill site location at around the 120ft depth (OSE well number C-2160 etc.). Also the area that the well pad is in proximity to what appears to be a drainage feature that has not only what appears to be an association to an ephemeral playa but also feeds as a water drainage source to the Delaware River which runs east to west and is directly south of the well site location.

- Thus likelihood of encountering shallow ground water for this location is high. Therefore, OCD will have to override the site ranking and give this site a site ranking of at least a 10, therefore changing target action clean up levels.

**This work plan as written is denied. Please provide a new work plan with proper delineation efforts and representative sampling data and which also addresses any and all other matters OCD has mentioned.**

Thank you,

## Crystal Weaver

Environmental Specialist

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Artesia, NM 88210

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**From:** Jennifer Knowlton <[jknowlton@hrlcomp.com](mailto:jknowlton@hrlcomp.com)>  
**Sent:** Monday, March 26, 2018 12:58 PM  
**To:** Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>; Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>  
**Cc:** Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Maurice Foye <[mfoye@hrlcomp.com](mailto:mfoye@hrlcomp.com)>; Honea, Tammy <[thonea@slo.state.nm.us](mailto:thonea@slo.state.nm.us)>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>  
**Subject:** RE: Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313

Mr. Naranjo:

I have attached a revised work plan that includes a revegetation plan.

**Jennifer Knowlton, PE** | Regional Manager Permian Basin  
HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 505-238-3588

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**From:** Naranjo, Mark [<mailto:MNaranjo@slo.state.nm.us>]  
**Sent:** Tuesday, March 20, 2018 8:34 AM  
**To:** Jennifer Knowlton <[jknowlton@hrlcomp.com](mailto:jknowlton@hrlcomp.com)>; [Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)  
**Cc:** Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Maurice Foye <[mfoye@hrlcomp.com](mailto:mfoye@hrlcomp.com)>; Honea, Tammy <[thonea@slo.state.nm.us](mailto:thonea@slo.state.nm.us)>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>  
**Subject:** RE: Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313

The NMSLO approves this work plan pending any other requirements from NMOCD. Please submit a revelation plan to the NMSLO at your earliest convince.

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**From:** Jennifer Knowlton [<mailto:jknowlton@hrlcomp.com>]  
**Sent:** Monday, March 19, 2018 2:03 PM  
**To:** [Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us); Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>  
**Cc:** Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Maurice Foye <[mfoye@hrlcomp.com](mailto:mfoye@hrlcomp.com)>  
**Subject:** Concho SRO State Com #13H Work Plan \* 30-015-37427 \* 2RP-4313

Ms. Weaver/Mr. Naranjo,

On behalf on COG Operating, I have attached a work plan for the SRO State Com #13H for your consideration. Please feel free to contact me if you have any questions or concerns.

Thank you,

**Jennifer Knowlton, PE** | Regional Manager Permian Basin  
HRL Compliance Solutions, Inc.

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