

From: [Pruett, Maria, EMNRD](#)
To: ["Zack Thomas"](#)
Cc: [Bratcher, Mike, EMNRD](#); [Justin Roberts](#)
Subject: Remediation Plan Approval 2RP-4781 RE: Ghost rider 25 36 WODM Fed Com #2H
Date: Thursday, September 20, 2018 8:44:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Hello Mr. Thomas,

OCD has received your Remediation Plan for 2RP-4781, thank you! This plan has been approved with the following conditions:

1. Contaminated soil will be removed to an OCD approved facility, not remediated in-situ by RxSoil.
2. Excavation of contaminated soils to following standards: 600 mg/kg chlorides, 5000 mg/kg TPH, 50 mg/kg BTEX and, 10 mg/kg Benzene.
3. Excavation to Figure 4. Spill Map specifications: Areas in red to 4 feet and areas in yellow to 2 feet. No liner will be added.
4. Final samples will include laboratory analytics for all 4 parameters in #2 above.
5. OCD will be notified 2 business days prior to final sampling.

Please let me know if you have any questions.

Best Regards,

Maria Pruett

Environmental Specialist
N.M. Oil Conservation Division
District 2
811 S. 1st Street
Artesia, NM 88210
Desk: 575 748-1283 X 101
Cell: 575 840-5963
Fax: 575748-9720

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: Zack Thomas <zthomas@mewbourne.com>
Sent: Monday, September 17, 2018 8:32 AM
To: Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Justin Roberts <diamondback2491@yahoo.com>

Subject: RE: 2RP-4781 RE: Ghost rider 25 36 WODM Fed Com #2H

Maria,

Attached is the Remediation Plan portion of the new C-141 packet that we discussed.

Proposed schedule for remediation:

Start date 9-18-18

Approximate remediation timeline: 30 working days



Zack Thomas
Environmental Rep.
Mewbourne Oil Company
[PO Box 5270](#)
Hobbs, NM 88241 US

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(575) 602-2188
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From: Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>

Sent: Thursday, September 13, 2018 5:07 PM

To: Zack Thomas <zthomas@mewbourne.com>

Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Justin Roberts <diamondback2491@yahoo.com>

Subject: 2RP-4781 RE: Ghost rider 25 36 WODM Fed Com #2H

Hello Mr. Thomas,

As you may know on August 14, 2018 NMOCD's new Spill Rule and updated C-141 came into effect. There are links below. At a minimum OCD will need the Remediation Plan section of the C-141 filled in. Once reviewed I may add as a condition of approval that the soil will be removed not remediated in-situ by RxSoil. Please note at this time 2RP-4781 does not have a reviewed or approved Remediation Plan for this spill. Let me know if you have any questions or need any assistance.

New Spill Rule:

<http://www.emnrd.state.nm.us/OCD/documents/NaturalResourcesWildlifeOilandGasReleases.pdf>

Updated C-141: <http://www.emnrd.state.nm.us/OCD/forms.html>

Best Regards,

Maria Pruett

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From: Zack Thomas <zthomas@mewbourne.com>
Sent: Thursday, September 13, 2018 4:44 PM
To: Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Justin Roberts <diamondback2491@yahoo.com>
Subject: Re: Ghost rider 25 36 W0DM Fed Com #2H

Maria,

I apologize but we do not have an updated remediation plan. We were planning to perform the excavation to the exact same depths as well as installing all liners as specified in RxSoil's Work plan but instead of washing the soil we will just dispose of it and bring in clean backfill. Diamondback then would complete a closure report of their own with all remediation activities explained, along with all required closure bottom hole and side wall sampling.

Z. Thomas

On Sep 13, 2018, at 4:06 PM, Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us> wrote:

Hello Zack,

Thank you for the update! Please send the updated Remediation Plan and the C-141 cover sheet.
Do you have links to the new rule and updated C-141?

Best Regards,

Maria Pruett

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From: Zack Thomas <zthomas@mewbourne.com>
Sent: Monday, September 10, 2018 9:27 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; Justin Roberts
<diamondback2491@yahoo.com>
Subject: Ghost rider 25 36 WODM Fed Com #2H

Mike and Maria,

I submitted a work plan/delineation from Rx Soil for this release about 10 days ago. I explained that we may very well go with dig and haul if cost effective, and that's what we are going to do. Diamondback will be performing the remediation and also the closure report when complete. The insurance company is pressuring us to start the work on this remediation asap.

<image001.png>

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