

Venegas, Victoria, EMNRD

From: Ike Tavaréz <itavarez@concho.com>
Sent: Thursday, October 24, 2019 1:11 PM
To: Venegas, Victoria, EMNRD
Cc: Dakota Neel; Sheldon Hitchcock; Jennifer Knowlton; Brittany Esparza; Sheldon Hitchcock
Subject: [EXT] RE: White Federal Com #001H (30-015-36185) 05-19-2019 2RP-5470
Attachments: Re: [EXTERNAL] (Deferral Request) White Federal Com #001H 05-19-2019 (2RP-5470)

Victoria,

Here is the email from the BLM requesting the removal of impacted soils around the flowlines located along the edge of the lease road. To access the impact, we moved the flowlines and excavated the elevated chlorides up to lease road. These areas are sample points: SW-E1-1.25: 10,200 mg/kg, SW-E1B-1.25: 11,600 mg/kg and SW-E1C-1.25: 6,090 mg/kg. Based on the additional remediation activities, a revised report will be submitted for your review and should meet the criteria for closure of the site. Let me know if you need additional information, thanks

Ike Tavaréz, PG
Senior HSE Supervisor
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-685-2573 | Main: 432-683-7443
Cell: 432-701-8630
itavarez@concho.com



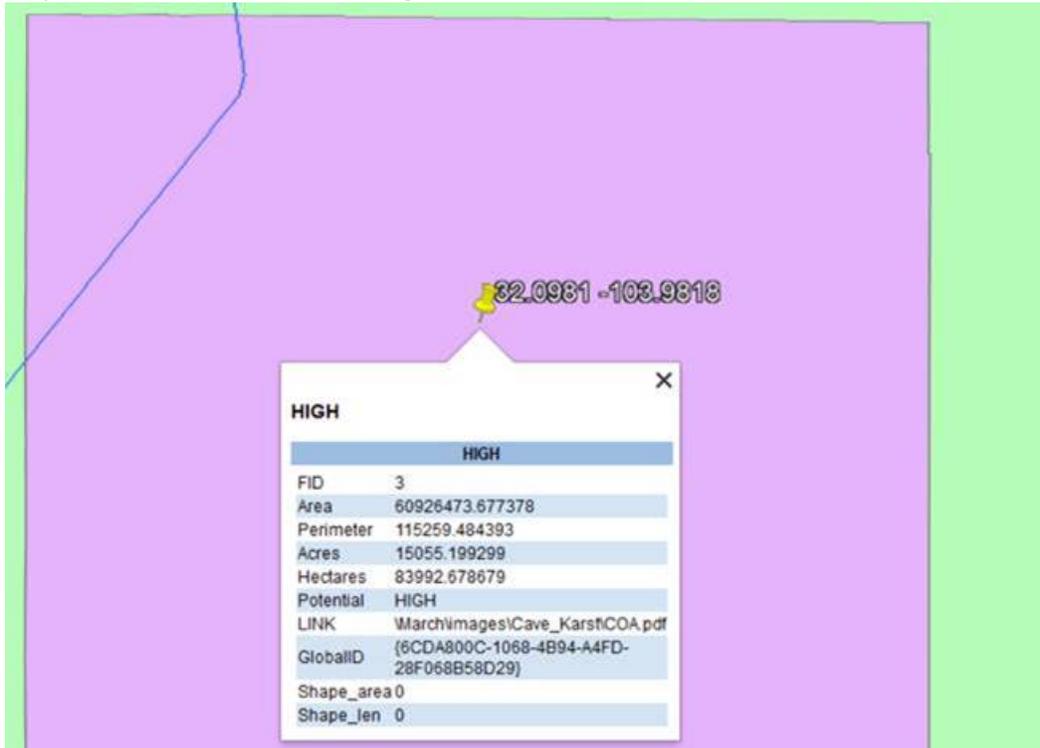
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From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]
Sent: Thursday, October 24, 2019 12:03 PM
To: Ike Tavaréz <itavarez@concho.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: blm_nm_cfo_spill@blm.gov; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Jennifer Knowlton <jknowlton@concho.com>
Subject: [External] White Federal Com #001H (30-015-36185) 05-19-2019 2RP-5470

White Federal Com #001H (30-015-36185) 05-19-2019 2RP-5470

Mr. Tavaréz,
OCD has received your closure/deferral request for White Federal Com #001H (30-015-36185) 05-19-2019 2RP-5470, thank you. This closure/deferral is DENIED for the following reasons:

1. This site does not meet the criteria to apply for a deferral. By Rule NMAC 19.15.29.12.C.2: “ If contamination is located in areas immediately under or around production equipment such as production tanks, wellheads and pipelines where remediation could cause a major facility reconstruction, the remediation, restoration and reclamation may be deferred with division written approval until the equipment is removed during other operations, or when the well or facility is plugged or abandoned, whichever comes first”.
2. The release has not been fully delineated. By Rule NMAC [19.15.29.12](#): “The DEFERRAL may be granted so long as the contamination is fully delineated and does not cause an imminent risk to human health, the environment or ground water”.
3. This site is subject to the most stringent closure levels in Table 1. According to the latest version of BLM’s karst map, this site is located in the “High Karst area” which is considered an unstable area under NMAC Rule Part 29.



- 4.
5. The Chloride concentration at sample points: SW-E1-1.25: 10 200mg/kg, SW-E1B-1.25: 11 600 mg/kg and SW-E1C-1.25: 6 090 mg/kg are unacceptably high.

More remediation effort should be made on this site. Considering this spill is located in a unstable area, OCD requests this site to be fully remediate to <50’ closure standards in Table I of 19.15.29.

Regards,

Victoria Venegas
 EMNRD
 OCD-District II
 Artesia NM
Victoria.Venegas@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.

From: Rebecca Haskell <RHaskell@concho.com>
Sent: Friday, August 16, 2019 9:42 AM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Jim Amos (jamos@blm.gov) <jamos@blm.gov>; DeAnn Grant <agrant@concho.com>; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Ike Tavarez <itavarez@concho.com>; Jennifer Knowlton <jknowlton@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: (Extension Request) White Federal Com #001H (30-015-36185) 05-19-2019 2RP-5470

Ms. Venegas,

Under the new spill rule a closure report is due for the above release on August 17, 2019. TRC on behalf of COG is currently preparing a closure report for an at risk remediation. COG would like to request an one month extension until September 17, 2019 to complete a closure report.

Thank you,

Becky Haskell
Senior HSE Coordinator
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-818-2372 | Main: 432.683.7443
Cell: 432-556-5130
rhaskell@concho.com



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From: Venegas, Victoria, EMNRD [<mailto:Victoria.Venegas@state.nm.us>]
Sent: Tuesday, June 04, 2019 12:55 PM
To: DeAnn Grant <agrant@concho.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; jamos@blm.gov
Cc: dmckinne@blm.gov; Jennifer Knowlton <jknowlton@concho.com>; Ike Tavarez <itavarez@concho.com>; Robert McNeill <RMcNeill@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: [External] RE: (C-141 Initial) White Federal Com #001H (30-015-36185) 05-19-2019

[EXT] (C-141 Initial) White Federal Com #001H (30-015-36185) 05-19-2019

All,
The OCD tracking number for this release event is 2RP-5470.
Thank you,

Victoria Venegas
EMNRD
OCD-District II
811 S First St. Artesia
NM 88210
Victoria.Venegas@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.

From: DeAnn Grant <agrant@concho.com>
Sent: Tuesday, June 4, 2019 11:11 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; jamos@blm.gov
Cc: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; dmckinne@blm.gov; Jennifer Knowlton <jknowlton@concho.com>; Ike Tavaréz <itavarez@concho.com>; Robert McNeill <RMcNeill@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: [EXT] RE: (C-141 Initial) White Federal Com #001H (30-015-36185) 05-19-2019

Mr. Hamlet,

The two releases were on separate days. It's coincidental that they each released 20 barrels from a flow line. The release on 5/17 overlapped the release on 5/13. Whereas, the release on 5/19 was in a different location. I apologize about the confusion and please let me know if you have any other questions.

Thank you,

DeAnn Grant

HSE Administrative Assistant
agrant@concho.com
COG Operating LLC
600 W Illinois Avenue | Midland, TX 79701
Direct: 432-253-4513 | Main: 432.683.7443



From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]
Sent: Tuesday, June 04, 2019 11:53 AM
To: DeAnn Grant <agrant@concho.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; jamos@blm.gov
Cc: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; dmckinne@blm.gov; Jennifer Knowlton <jknowlton@concho.com>; Ike Tavaréz <itavarez@concho.com>; Robert McNeill <RMcNeill@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>
Subject: [External] RE: (C-141 Initial) White Federal Com #001H (30-015-36185) 05-19-2019

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

DeAnn,

This looks identical to the C-141 for 5-17-19. Both wells have the exact same description, spill amounts, same name and API number, but different section numbers. Not sure what's going on with these two?

Thanks

From: DeAnn Grant <agrant@concho.com>
Sent: Tuesday, June 4, 2019 8:39 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; jamos@blm.gov
Cc: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; dmckinne@blm.gov; Jennifer Knowlton <jknowlton@concho.com>; Ike Tavarez <itavarez@concho.com>; Robert McNeill <RMcNeill@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>; Rebecca Haskell <RHaskell@concho.com>; DeAnn Grant <agrant@concho.com>
Subject: [EXT] (C-141 Initial) White Federal Com #001H (30-015-36185) 05-19-2019

Mr. Bratcher/Mr. Amos,

Please find the attached C-141 for your consideration. Also, attached is the calculation sheet to determine the estimated release volume. The liquid lost estimate is based on the spill dimensions, estimated depth of fluid (wet soil depth) and type of formation. The spreadsheet will calculate the volume lost in the ground and does not include the recovered amount in the calculation. The calculated volume in the ground and the volume recovered were added together and reported on the C-141. If you have any questions or concerns please do not hesitate to contact me.

Thank you,

DeAnn Grant

HSE Administrative Assistant

agrant@concho.com

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443

