

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Friday, September 25, 2020 9:28 AM
To: 'Julie Linn'; Marcus, Ramona, EMNRD; Bratcher, Mike, EMNRD; Hamlet, Robert, EMNRD
Cc: Kyle Alpers (kalpers@aecnm.com); Bratcher, Mike, EMNRD; Marcus, Ramona, EMNRD
Subject: RE: Request for Extension: nRM2021936507

NRM2021936507 LONG TALL SALLY #1 @ 30-041-20954

Ms. Linn,
Your request for an extension to December 28, 2020 is approved
Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 909-0269
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: Julie Linn <JLinn@hrlcomp.com>
Sent: Thursday, September 24, 2020 3:45 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Kyle Alpers (kalpers@aecnm.com) <kalpers@aecnm.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>
Subject: [EXT] RE: Request for Extension: nRM2021936507

Ms. Venegas:

The release occurred on July 21, 2020. Armstrong has already mobilized to the site and excavated a large quantity of material. Unfortunately, this wasn't done in complete accordance with NMOCD rules, and the closure request was rejected by NMOCD. Therefore, Armstrong requested HRL to assist with conducting a site characterization and developing a remediation plan in accordance with NMOCD rules. HRL completed the site characterization activities on August 15, 2020, which included collection and analysis of 23 soil samples at various depths and latitude/longitude to complete the horizontal and vertical delineation of the impacts at the Site. The data for the site characterization was received by HRL on September 11, 2020. HRL has evaluated the data and discussed the Site and potential remediation options with Armstrong. At this time, Armstrong has requested additional time to discuss the potential remediation options with their internal management prior to selecting an approach to remediate this site. This is primarily due to the complexity of the release impacting soil under and immediately adjacent to an active tank battery. Please let me know if I can answer any other questions for you. Thanks for your consideration of this request.

Julie

Julie Linn, PG, RG | Project Manager

HRL Compliance Solutions, Inc.

main 970.243.3271 | mobile 970.903.8747

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From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Thursday, September 24, 2020 3:32 PM

To: Julie Linn <JLinn@hrlcomp.com>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Kyle Alpers (kalpers@aecn.com) <kalpers@aecn.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>

Subject: RE: Request for Extension: nRM2021936507

NRM2021936507 LONG TALL SALLY #1 @ 30-041-20954

Ms. Linn,

The OCD has denied the Extension Request for incident # NRM2021936507 LONG TALL SALLY #1 @ 30-041-20954 for the following reason:

- The operator has not met the requirements of the rule to request an extension. Per [19.15.29.12](#) NMAC: *The responsible party may request an extension of time to remediate upon a showing of good cause as determined by the division*". It isn't as simple as just asking for it.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
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(575) 909-0269
Victoria.Venegas@state.nm.us

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From: Julie Linn <JLinn@hrlcomp.com>

Sent: Thursday, September 24, 2020 12:21 PM

To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Kyle Alpers (kalpers@aecn.com) <kalpers@aecn.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: [EXT] RE: Request for Extension: nRM2021936507

Hi Victoria

Armstrong would like additional time to evaluate the site characterization results and develop a remediation plan.

Thanks

Julie

Julie Linn, PG, RG | Project Manager

HRL Compliance Solutions, Inc.

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From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Thursday, September 24, 2020 12:02 PM

To: Julie Linn <JLinn@hrlcomp.com>; Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Kyle Alpers (kalpers@aecnm.com) <kalpers@aecnm.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: RE: Request for Extension: nRM2021936507

NRM2021936507 LONG TALL SALLY #1 @ 30-041-20954

Ms. Linn,

Per [19.15.29.12](#) NMAC :*The responsible party may request an extension of time to remediate upon a showing of good cause as determined by the division*". Please provide a reason for your extension request.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 909-0269
Victoria.Venegas@state.nm.us

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From: Julie Linn <JLinn@hrlcomp.com>

Sent: Thursday, September 24, 2020 11:28 AM

To: Marcus, Ramona, EMNRD <Ramona.Marcus@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Kyle Alpers (kalpers@aecnm.com) <kalpers@aecnm.com>

Subject: [EXT] RE: Request for Extension: nRM2021936507

All:

I have not heard anything back on this request yet. Is there additional information you need from me in order to reply?
The original remediation due date was October 19, 2020.
We would like to request an extension to December 28, 2020.
Thanks much!
Julie

Julie Linn, PG, RG | Project Manager

HRL Compliance Solutions, Inc.

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From: Julie Linn

Sent: Thursday, September 10, 2020 10:39 AM

To: 'Ramona.Marcus@state.nm.us' <Ramona.Marcus@state.nm.us>; mike.bratcher@state.nm.us

Cc: Kyle Alpers (kalpers@aecnm.com) <kalpers@aecnm.com>

Subject: Request for Extension: nRM2021936507

On behalf of Armstrong Energy Corporation, we would like to request an extension for submission of the site characterization and remediation plan for the July 21, 2020 release at the Long Tall Sally #1 facility. This facility is at latitude 33.862831 and Longitude -103.412047 in Roosevelt County. This has been assigned incident Number nRM2021936507. Please feel free to contact us with any additional questions or concerns.

Julie Linn, PG, RG | Project Manager

HRL Compliance Solutions, Inc.

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