

Venegas, Victoria, EMNRD

From: Michael Gant <MGant@lucid-energy.com>
Sent: Monday, May 11, 2020 12:29 PM
To: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Hamlet, Robert, EMNRD
Cc: Matthew Eales; Glen Blake
Subject: [EXT] Juniper discussion nAB1927551697 and pAB1922058193

Mr. Bratcher,

I wanted to discuss the current status of a few remediation projects that were rejected earlier this year, Juniper 1&2. The reference numbers for these sites are listed below.

- Juniper 1 - nAB1927551697
- Juniper 2 - pAB1922058193

Here is a quick background of the sites. Both releases happened at the same location on the same pipeline riser, the first on 7/15/19 and the second on 9/5/19. HRL supervised remediation at the Juniper site, then Lucid took over remediation during the second release event. HRL referenced the 2005 Chevron Groundwater map rather than proving groundwater in these remote areas. Soil was remediated to the standards listed in NMAC 19.15.29 Table 1 relative to a groundwater depth approximately 50' shallower than the interpreted local groundwater due to lack of current, proximal groundwater data and without drilling. Victoria later notified me of the closure rejection for these sites. I have listed the reasons for rejections below.

- Juniper 1 report lacked current, non-interpolated groundwater data
- Juniper 2 report did not upload correctly and was missing appendices also no new groundwater data

Lucid would greatly appreciate the opportunity to further discuss this site with the OCD to determine a logical and cost-effective approach to closure considering the current state of the industry and operations in SE NM. Lucid would like to continue to foster a positive productive relationship with the OCD and appreciates the increased flexibility during this period. If you would like, we can setup a conference call or Teams meeting at your convenience.

Thanks,

Michael Gant

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