

From: [Yu, Olivia, EMNRD](#)
To: ["Geoff Leking"; stucker@blm.gov](#)
Cc: ["Dawson, Penny"; "Pilkington, William"; brian@etechnv.com](#)
Subject: RE: Revised Enervest Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan - 1RP - 4564
Date: Thursday, May 4, 2017 7:47:00 AM
Attachments: [Approved26Apr2017_WP_#2_1RP-4564_CAP.pdf](#)

Dear Mr. Leking:

Please see the attachment for your records. NMOCD approves the revised workplan dated April 26, 2017. Your compliance efforts and patience are sincerely appreciated.

Thanks much,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Geoff Leking [mailto:geoff@etechnv.com]
Sent: Wednesday, April 26, 2017 12:02 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com
Subject: Revised Enervest Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan - 1RP - 4564

Olivia and Shelly

On the behalf of Enervest Operating, Etech Environmental & Safety Solutions, Inc. is pleased to submit the above referenced document for your review. The following revisions are included in this document:

1. Global – The remediation threshold level for chlorides has been changed to 600 mg/kg.
2. Background – Text has been added describing the performance of Boring 1 on April 11, 2017 as well as discussing the analytical results of the samples collected from Boring 1 on that date.
3. Table 1 – The analytical results from the April 11, 2017 sampling event of Boring 1 have been added.

4. Depth and Method of Remediation – Table 3 – The method of remediation for the Bottom Hole 5 and Bottom Hole 6 locations has been changed to “Excavate/Plastic Liner”.
5. Scope of Work – Bullet 2 describes the additional excavation that will be performed at the Bottom Hole 5 and Test Trench 5 and Bottom Hole 6 and Test Trench 6 area of the pad.
 - Bullet 3 states that all excavated soils will be hauled to an NMOCD approved facility for disposal.
 - Bullet 4 states that both bottom hole and sidewall soil samples will be collected from the remediated areas.
 - Bullet 7 describes backfill procedures at the Bottom Hole 5 and Test Trench 5 and Bottom Hole 6 and Test Trench 6 area of the pad.
 - Bullet 8 contains additional text pertaining to the plastic liner that will be installed at the Bottom Hole 5 and Test Trench 5 and Bottom Hole 6 and Test Trench 6 area of the pad.
6. Attachment B – Annotated Aerial Imagery – The map has been revised to display the location of Boring 1, the excavation demarcation line in the Boring 5 and Test Trench 5 and Boring 6 and Test Trench 6 area of the pad, and the depths to which each side of the demarcation line will be excavated.
7. Attachment C – Well Record & Log – Contains the Well Record & Log of Boring 1.
8. Attachment D – Photo Log – Photo documentation of the performance of Boring 1 has been added.
9. Attachment F – Analytical Results – The analytical results for the soil samples collected from Boring 1 on April 11, 2017 have been added.

I look forward to your response. Please contact me with any questions or concerns. Thank you.

Geoff Leking

Etech Environmental & Safety Solutions, Inc.
PO Box 62228
Midland, Texas 79711
Office: (432)563-2200 ext. 212
Fax: (432)563-2213

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, April 19, 2017 2:07 PM
To: Geoff Leking; stucker@blm.gov
Cc: 'Dawson, Penny'; 'Pilkington, William'; brian@etechnv.com; 'Tim McMinn'
Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Mr. Leking:

Thank you for the update. I will wait to review upon receipt of the next version of the corrective action plan for 1RP-4564.

Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Tuesday, April 18, 2017 1:30 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>
Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Olivia

The analytical results of the delineation samples collected from the boring performed on April 11, 2017 are attached. The chloride concentrations ranged from 6.73 mg/kg (Boring 1 15') to 10.7 mg/kg (Boring 1 10'). I will tabulate the data and insert the appropriate text in the corrective action plan. Please contact me with any questions or concerns. Thank you.

Geoff Leking

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, April 17, 2017 12:58 PM
To: Geoff Leking; stucker@blm.gov
Cc: 'Dawson, Penny'; 'Pilkington, William'; brian@etechnv.com; 'Tim McMinn'
Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Dear Mr. Leking:

I will amend NMOCD's approval for 1RP-4564 regarding Trench 5 in the email sent earlier today (proposed remediation in the document dated from April 4, 2017) until I received the below data.

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Thursday, April 13, 2017 7:52 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>
Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Olivia

The boring was performed successfully on Tuesday, April 11, 2017. Field testing for chlorides indicated that chloride concentrations for samples at 10', 15', and 20' below ground surface (bgs) were below detection. Confirmation soil samples have been sent to Permian Basin Environmental Laboratory (PBELAB) for analysis. Please contact me if you have questions. Thank you.

Geoff Leking

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, April 4, 2017 5:32 PM
To: Geoff Leking; stucker@blm.gov
Cc: 'Dawson, Penny'; 'Pilkington, William'; brian@etechnv.com; 'Tim McMinn'
Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Mr. Leking:

Thank you for the notice. I will check my schedule.

Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]

Sent: Tuesday, April 4, 2017 1:57 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov

Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>

Subject: RE: Enervest Jack B-30 #2 Tank Battery Lightning Strike boring at Bottom Hole 5/Test Trench 5 location

Olivia

The boring at the above referenced location is scheduled to be performed next Tuesday, April 11, 2017 beginning at approximately 9:30 AM New Mexico time. Myself and an additional Etech employee will be onsite to collect samples and perform chloride testing. Your attendance is welcome and splits will be made available at your request. Thank you.

Geoff Leking

Etech Environmental & Safety Solutions, Inc.

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Wednesday, March 29, 2017 4:12 PM

To: Geoff Leking; stucker@blm.gov

Cc: Dawson, Penny; Pilkington, William; brian@etechnv.com; 'Tim McMinn'

Subject: RE: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Dear Mr. Leking:

NMOCD approves the use of air rotary drilling rig as indicated for additional delineation of Trench 5 (1RP-4564). Thank you for the information.

Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]

Sent: Wednesday, March 29, 2017 1:00 PM

To: stucker@blm.gov

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Dawson, Penny <PDawson@EnerVest.net>;

Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn'

<tim@etechnv.com>

Subject: FW: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Shelly

Below is an email detailing our plan to further delineate the Test Trench 5 location at the Enervest Jack B-30 #2. I look forward to your response. Thank you.

Geoff Leking

Etech Environmental & Safety Solutions, Inc.

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From: Geoff Leking [<mailto:geoff@etechenv.com>]

Sent: Wednesday, March 29, 2017 1:44 PM

To: 'Yu, Olivia, EMNRD'

Cc: 'Dawson, Penny'; 'Pilkington, William'; 'brian@etechenv.com'; 'Tim McMinn'

Subject: RE: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

We plan to further delineate the Test Trench 5 location by performing a boring using an air rotary drilling rig. Myself and possibly one other Etech field personnel will be on site to perform field testing for chloride concentrations as the samples are collected by air surfaced sampling techniques with periodic undisturbed sampling from select intervals. Once a sample displays a chloride concentration below 600 mg/kg, samples will be collected at an additional five (5) foot and ten (10) foot depth. I look forward to your response. Thank you.

Geoff Leking

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Please immediately notify the sender by return mail and delete it.*

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, March 13, 2017 8:29 AM
To: Geoff Leking
Cc: Dawson, Penny; Pilkington, William; brian@etechnv.com; Tim McMinn
Subject: RE: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Good morning All:

In reviewing the delineation workplan for 1RP-4564 again, Test Trench 5 has not been completely delineated. At 9 ft. bgs, the chloride levels increased passed the permissible amount. Please complete delineation until at or below 600 mg/kg chlorides and maintained for 10 ft.

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Sunday, March 12, 2017 7:34 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; Tim McMinn <tim@etechnv.com>
Subject: Re: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

I will make the demarcation for you.

Trenches 5 and 6 are in the tank battery area where a liner is being installed at ground surface.

Sent from my iPhone

On Mar 10, 2017, at 12:58 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Dear Mr. Leking:

Please be advised that NMOCD can be flexible with permissible chloride limits to 600 mg/kg when depth to groundwater is > 100 ft. bgs, not 1000 mg/kg. Please clarify a few discrepancies regarding the revised workplan for 1RP-4564 as highlighted in green below.

- 1) The two points in the pastures are 2 and 3, in which elevated chloride levels are found at 24" and 18" respectively in the bottom samples. If I understood the text below correctly about excavating an additional 6" below, you

proposing to excavate to 2.5 ft around sample area 2 and 2 ft. around sample area 3? Where in the pasture will the excavation depth change? Please demarcate on the map.

2) Why the difference in permissible chloride limits for trench 5 and 6?

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]

Sent: Thursday, March 2, 2017 2:14 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>

Subject: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

My apologies for the confusing format of the last email. Please ignore. Here is the corrected email.

This revised corrective action plan (CAP) responds to comments made by the NMOCD on the original CAP regarding additional depth to groundwater documentation. It also incorporates the laboratory data for the 2.17.17 sampling event and revised Scope of Work per that data. There are also additional text, maps, and photos pertaining to events that have occurred at the site since the submittal of the original CAP.

Pasture Area

It should be noted that precipitation from a rain event that occurred approximately on Sunday February 12, 2017 apparently caused chlorides to wick to surface depths of the excavation in the pasture. Sample results from delineation soil samples collected on January 23, 2017 determined the range of chloride concentrations to be 14.9 to 43.2 mg/kg at or above the current excavation depths. The chloride concentrations now range from 1,130 to 1,180 mg/kg as determined from confirmation soil samples collected on February 17, 2017.

I revised the scope of work (SOW) to state “Excavate the pasture area an additional 6” below the current bottom of excavation depths. Field test for chloride concentrations. Excavate until regulatory threshold levels are met.”

Tank Battery Area

TPH

The Bottom Hole 5 12" sample collected from the northern portion of the tank battery displayed a TPH concentration of 10,700 mg/kg which exceeds the NMOCD limit of 5,000 mg/kg. I am having the Test Trench 5 2' sample analyzed for TPH to display that TPH levels fall below the 5,000 mg/kg limit. If needed I will have deeper samples analyzed until we see TPH concentrations fall below 5,000 mg/kg.

Chlorides

The Bottom Hole 6 12" sample and Test Trench 6 2' sample collected from the southern portion of the tank battery displayed chloride concentrations of 1,330 mg/kg and 1,900 mg/kg, respectively, which exceed the NMOCD limit of 1,000 mg/kg for chlorides.

The deepest test trench samples, Test Trench 5 9' and Test Trench 6 8' displayed chloride concentrations of 988 mg/kg and 410 mg/kg, respectively. These are above the 250 mg/kg NMOCD delineation limit.

I revised the SOW to state "...The plastic liner will prevent any further recharge to the impacted soils beneath it, so that vertical migration of the constituents of concern is prevented."

I look forward to your response concerning the revised CAP. Please contact me if you have any questions or concerns. Thank you, Olivia.

Geoff Leking

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Fax: (432)563-2213

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From: [Yu, Olivia, EMNRD](#)
To: ["Geoff Leking"; Oberding, Tomas, EMNRD](#)
Cc: ["Dawson, Penny"; "Pilkington, William"; brian@etechnv.com; "Tim McMinn"; "Shelly Tucker"](#)
Subject: RE: 3.29.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan
Date: Monday, April 17, 2017 11:05:00 AM

Dear Mr. Leking:

NMOCD accepts the proposed remediation plan for 1RP-4564 although the Responsible Party is conducting activities at risk due to these concerns.

- Trench 5 has not been fully delineated vertically to 600 mg/kg chlorides and maintained for a minimum of 5 ft. below.
- No excavation of impacted soil on the pad for areas around Bottom Hole 5 and 6 before placement of the liner at the surface.

NMOCD requests that bottom and sidewall confirmation samples at 30" for the area excavated around Bottom Hole 2 and at 24" for the area excavated around Bottom Hole 3 be sent to an accredited laboratory for analyses of Benzene, BTEX, TPH, and chloride levels. Please confirm. Please be advised that NMOCD's position is that remediation level for chloride is 600 mg/kg.

Thanks,
Olivia

From: Geoff Leking [mailto:geoff@etechnv.com]
Sent: Tuesday, April 4, 2017 9:25 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>; 'Shelly Tucker' <stucker@blm.gov>
Subject: RE: 3.29.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

In response to your comments, a section entitled "Depth and Method of Remediation" has been added to this version of the corrective action plan. It contains "Table 3 Summary of Depth and Method of Remediation" which displays the sample location, location type (pad or pasture), depth of remediation, method of remediation, and status of the remediation (completed or pending).

I look forward to your response. Thank you.

Geoff Leking

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Fax: (432)563-2213

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Thursday, March 30, 2017 11:01 AM

To: Geoff Leking

Cc: Dawson, Penny; Pilkington, William; brian@etechnv.com; Tim McMinn; Shelly Tucker

Subject: RE: 3.29.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Dear Mr. Leking:

According to NMOCD guidelines, there is no chloride standard for remediation. Each release is evaluated on an individual basis. Please provide evidence otherwise.

In order for efficient further review of the delineation and remediation plan for 1RP-4564, please submit a concise report, indicating to which depths each sample location area (pad and pasture) will be remediated.

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]

Sent: Thursday, March 30, 2017 5:31 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; Tim McMinn <tim@etechnv.com>; Shelly Tucker <stucker@blm.gov>

Subject: Re: 3.29.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

Isn't 600 mg/kg still only a delineation value and the remediation threshold value for over 100 feet to ground water is still 1000 mg/kg per guidance?

Sent from my iPhone

On Mar 29, 2017, at 5:07 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Dear Mr. Leking:

Thank you for the additional information. NMOCD approves the revised workplan for 1RP-4564, in regards to excavation depths for the areas around sample location 2 and 3, on the condition that bottom confirmation samples at the 30" excavation area and 24" excavation samples are taken and analyzed for chlorides. The nearest provided data on chloride levels at bottom hole 2 at 24" and bottom hole 3 at 18" are above permissible values. Thus, if bottom samples at 30" and 24" are over 600 mg/kg chlorides, as mentioned in bullet #2 "The pasture area will be excavated to remove impact to below regulatory thresholds."

Do we have an agreement?

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Wednesday, March 29, 2017 1:20 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; 'Pilkington, William' <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>; 'Shelly Tucker' <stucker@blm.gov>
Subject: 3.29.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

Submitted for your review is the above referenced document revised per your comments:

1. The language of bullet 1 under Scope of Work has been changed to indicate the depths to which the pasture areas will be excavated. In addition, the Annotated Imagery has been edited to indicate the demarcation line between the separate pasture areas and to what depths the two areas in the pasture will be excavated.
2. The only area that is planned to be lined at this time is the tank battery area. The pasture area will be excavated to remove impact to below regulatory thresholds. Only if excavation depths of the pasture becomes prohibitive (i.e., six (6) feet bgs) will the request to install a liner in the pasture be made. The liner in the tank battery area will be installed at ground level. It will prevent any additional recharge from reaching the impacted soils below. This impact is represented by the Bottom Hole 5, Bottom Hole 6, and Test Trench 6 soil samples.

I look forward to your response. Thank you.


Geoff Leking

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, March 23, 2017 5:05 PM
To: Geoff Leking; Shelly Tucker (stucker@blm.gov)
Cc: Dawson, Penny; Pilkington, William; brian@etechnv.com; Tim McMinn
Subject: RE: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Dear Mr. Leking:

Please state explicitly which areas will be removed to what depth. As stated "Excavate the pasture area an additional 6" below the current bottom of excavation depths" is vague as the trenches are at different depths. At what depth and over which areas will the proposed liner be set? The response from March 12 seems to indicate that the liner set in Trench 5 & 6 areas would be for the tanks, i.e., creating a lined facility, rather than a liner in the pasture for prevention of chloride migration.

Note: Please include Ms. Tucker (or designated BLM contact) in all communications. Like approval is required.

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Tuesday, March 14, 2017 12:02 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; Tim McMinn <tim@etechnv.com>
Subject: Re: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

Besides the delineation requirement, is the installation of the liner and the removal of the additional 6" in the pasture adequate to close the site depending on the confirmation samples in the pasture? Thank you.

Sent from my iPhone

On Mar 13, 2017, at 8:28 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Good morning All:

In reviewing the delineation workplan for 1RP-4564 again, Test Trench 5 has not been completely delineated. At 9 ft. bgs, the chloride levels increased passed the permissible amount. Please complete delineation until at or below 600 mg/kg chlorides and maintained for 10 ft.

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Sunday, March 12, 2017 7:34 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; Tim McMinn <tim@etechnv.com>
Subject: Re: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

I will make the demarcation for you.

Trenches 5 and 6 are in the tank battery area where a liner is being installed at ground surface.

Sent from my iPhone

On Mar 10, 2017, at 12:58 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Dear Mr. Leking:

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4564 as highlighted in green below.

1. The two points in the pastures are 2 and 3, in which elevated chloride levels are found at 24" and 18" respectively in the bottom samples. If I understood the text below correctly about excavating an additional 6" below, you proposing to excavate to 2.5 ft around sample area 2 and 2 ft. around sample area 3? Where in the pasture will the excavation depth change? Please demarcate on the map.
2. Why the difference in permissible chloride limits for trench 5 and 6?

Thanks,
Olivia

From: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Thursday, March 2, 2017 2:14 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Dawson, Penny <PDawson@EnerVest.net>; Pilkington, William <WPilkington@EnerVest.net>; brian@etechnv.com; 'Tim McMinn' <tim@etechnv.com>
Subject: 3.1.17 Enervest Jack B-30 #2 Tank Battery Lightning Strike Revised Corrective Action Plan

Olivia

My apologies for the confusing format of the last email.
Please ignore. Here is the corrected email.

This revised corrective action plan (CAP) responds to comments made by the NMOCD on the original CAP regarding additional depth to groundwater documentation. It also incorporates the laboratory data for the 2.17.17 sampling event and revised Scope of Work per that data. There are also additional text, maps, and photos pertaining to events that have occurred at the site since the submittal of the original CAP.

Pasture Area

It should be noted that precipitation from a rain event that occurred approximately on Sunday February 12, 2017 apparently caused chlorides to wick to surface depths of the excavation in the pasture. Sample results from delineation

From: [Yu, Olivia, EMNRD](#)
To: [Geoff Leking](#)
Cc: [Dawson, Penny](#); brian@etechnv.com; [Oberding, Tomas, EMNRD](#); stucker@blm.gov
Subject: RE: Enervest Operating - Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan -1RP-4564
Date: Friday, February 17, 2017 4:11:00 PM

Mr. Leking:

All 4 AH locations need to be vertically delineated to 250 mg/kg chloride levels and maintained for 10 ft. bgs. For example, if 250 mg/kg is reached at 1 ft., then there should be another soil sample taken at 6 ft. and 11 ft. bgs. The minimum interval between depth of soil samples is 5 ft.

Thanks,
Olivia

From: Geoff Leking [mailto:geoff@etechnv.com]
Sent: Friday, February 17, 2017 3:30 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Dawson, Penny <PDawson@EnerVest.net>; brian@etechnv.com; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; stucker@blm.gov
Subject: Re: Enervest Operating - Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan -1RP-4564

Olivia

Liner included in work plan. Is 10 feet bags at AH-2 the only location to test to 10' bags?

Thank you.

Sent from my iPhone

On Feb 17, 2017, at 3:01 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Leking:

NMOCD request complete delineation until 250 mg/kg chloride levels and maintained for 10 ft. bgs. As there appears to be potential for pooling at AH #2, another sample point is requested.

RE: question about 6" excavation on pads. Is the Responsible Party planning to install a metal liner/secondary containment after removal of damaged equipment? If not, excavation is to the depth until contaminants are within permissible levels. In this case, 1 ft. or more bgs. The information provided on the C-141 is not clear. Will there be a liner installed or not?

Thanks,

Olivia

From: Yu, Olivia, EMNRD
Sent: Friday, February 17, 2017 9:01 AM
To: Geoff Leking <geoff@etechnv.com>
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; brian@etechnv.com; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; stucker@blm.gov
Subject: RE: Enervest Operating - Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan -1RP-4564

Dear Mr. Leking:

Please resubmit the workplan for 1RP-4564 with the following documentation:

- 1) Missing laboratory analyses for AH1 0-6"; AH2 0-6", 6-12", 12-18". Collate all laboratory documents.
- 2) Pdfs of OSE and Chevron water trend map results.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Geoff Leking [<mailto:geoff@etechnv.com>]
Sent: Monday, January 30, 2017 7:44 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Dawson, Penny' <PDawson@EnerVest.net>; brian@etechnv.com
Subject: Enervest Operating - Jack B-30 #2 Tank Battery Lightning Strike Corrective Action Plan -1RP-4564

Olivia

On behalf of Enervest Operating, Etech Environmental & Safety Solutions, Inc. is pleased to submit the Corrective Action Plan for the Enervest Operating – Jack B-30 #2

Tank Battery Lightning Strike – 1RP-4564. Please contact me with any questions or concerns. I look forward to your response. Thank you.

Geoff Leking

Etech Environmental & Safety Solutions, Inc.

PO Box 62228

Midland, Texas 79711

Office: (432)563-2200 ext. 212

Fax: (432)563-2213

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