

**From:** Groves, Amber  
**To:** [Cliff Brunson](#); [Yu, Olivia, EMNRD](#)  
**Cc:** ["Becky Haskell"](#); ["Dakota Neel"](#); ["Aaron Lieb"](#); ["Ken Swinney"](#); ["Jennifer Gilkey"](#); ["Kathy Purvis"](#)  
**Subject:** RE: COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan  
**Date:** Thursday, July 6, 2017 3:02:15 PM  
**Attachments:** image002.png  
image001.png

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Cliff,

NMSLO is in agreement with NMOCD on work plan approval and conditions of approval.

Please advise once remediation is complete whether the area in the pasture was disturbed and seeded.

Thank you,

**Amber Groves**

*Remediation Specialist*  
*Field Operations Division*  
(575)392-3697  
(575)263-3209 cell  
New Mexico State Land Office  
2827 N. Dal Paso Suite 117  
Hobbs, NM 88260

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**From:** Cliff Brunson [mailto:cbrunson@bbcinternational.com]  
**Sent:** Friday, June 30, 2017 12:09 PM  
**To:** 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Groves, Amber <agroves@slo.state.nm.us>  
**Cc:** 'Becky Haskell' <rhaskell@concho.com>; 'Dakota Neel' <DNeel2@concho.com>; 'Aaron Lieb' <ALieb@concho.com>; 'Ken Swinney' <kswinney@bbcinternational.com>; 'Jennifer Gilkey' <jgilkey@bbcinternational.com>; 'Kathy Purvis' <kathy@bbcinternational.com>  
**Subject:** RE: COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan

Olivia,

Thank you for your approval and this message is to confirm that COG accepts the condition for this approval.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
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World-Wide Environmental Specialists  
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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Friday, June 30, 2017 10:38 AM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>; 'Amber Groves' <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>  
**Cc:** Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Aaron Lieb <[ALieb@concho.com](mailto:ALieb@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** RE: COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan

Dear Mr. Brunson:

NMOCD approves of the delineation and proposed remediation for 1RP-4520 with one condition:

- For the areas encompassing SP1-4, bottom and sidewall confirmation samples for TPH and chlorides at 6" depth of excavation. If permissible levels are exceeded, excavate to 1 ft. bgs. with confirmation samples. Please confirm.

Like approval from SLO is required.

Thanks,  
Olivia

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**From:** Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Monday, June 12, 2017 2:50 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; 'Amber Groves' <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>  
**Cc:** Becky Haskell <[rhaskell@concho.com](mailto:rhaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Aaron Lieb <[ALieb@concho.com](mailto:ALieb@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** RE: COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan

Olivia and Amber,

Please find attached a revised and updated Delineation Workplan for 1RP-4520. This updated plan addresses the 4 concerns that are listed below in your previous email. COG looks forward to receiving NMOCD and SLO approval so they can move forward.

Thanks, Cliff

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Thursday, April 13, 2017 3:20 PM  
**To:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>; Amber Groves <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>  
**Cc:** Robert Grubbs <[RGrubbs@concho.com](mailto:RGrubbs@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** RE: COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan

Dear Mr. Brunson:

Please address these concerns regarding the delineation workplan for 1RP-4520:

- 1) The Google Earth image does not appear to show the presence of a berm between the pad and pasture. Please provide photographic evidence that the release did not flow into the pasture and impact to pasture was only overspray.
- 2) Additional sample points are requested based on potential pooling locations and distance between current sample locations:
  - a. 3 in the spill area: behind the battery (northeast of the West Sample location), west of East Sample location, and center of SP1-4.
  - b. 2 in the spray area: closer to the pad, southwest and southeast of SP3 (between SP5 & SP6 and between SP5 & SP7).
- 3) In addition to Benzene, BTEX, and TPH, laboratory analyses for all sample points need to include chlorides. The production log for this well notes that 473 bbls of produced water was recorded for 17 days of production in November 2016.
- 4) Like approval from SLO is needed for the delineation workplan as well as a revegetation plan.

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto: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.

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**From:** Cliff Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Friday, March 24, 2017 2:05 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Amber Groves <[agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us)>  
**Cc:** Robert Grubbs <[RGrubbs@concho.com](mailto:RGrubbs@concho.com)>; Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>; Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>; Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>  
**Subject:** COG - Macho Nacho State #002H (1RP-4520) - Delineation Workplan

Olivia and Amber,

Please find the attached Delineation Workplan and remediation proposal for the COG Macho Nacho State #002H (1RP-4520). COG is requesting that you review this plan and is looking forward to the OCD's and SLO's approval.

If you have any questions, please let me know.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
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