

From: [Yu, Olivia, EMNRD](#)
To: [Rebecca Haskell](#); [Green, Nikki](#); [Price, Henryetta](#); [Billings, Bradford, EMNRD](#)
Cc: [stucker@blm.gov](#); [Dakota Neel](#); [Aaron Lieb](#); [Sheldon Hitchcock](#)
Subject: RE: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan
Date: Monday, October 30, 2017 9:02:00 AM

Ms. Haskell:

As the release for 1RP-4651 occurred on well location with no impact to pasture, NMOCD will agree to testing of excavated soil at every 50 cubic yards. However, chloride analyses are still required for all samples for confirmation.

Thanks,
Olivia

From: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Wednesday, October 25, 2017 1:14 PM
To: Green, Nikki <NGreen@trcsolutions.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Price, Henryetta <hprice@blm.gov>
Cc: stucker@blm.gov; Dakota Neel <DNeel2@concho.com>; Aaron Lieb <ALieb@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>
Subject: RE: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan

Ms. Yu,

- As with others sites you have approved of on-site aeration of excavated soil, would it be sufficient to sample the soil every 50 cubic yards? One sample would be collected every 50 cubic yards and analyzed for TPH and BTEX since those are the constituents of concern.
- Bullet point two is agreed upon. Confirmation samples will be collected as instructed and analyzed for BTEX and TPH. Delineation samples have already demonstrated chloride concentrations are below 600 mg/Kg and will not be analyzed for.
- Bullet point three is agreed upon. Confirmation samples will be collected as instructed and analyzed for BTEX and TPH. Delineation samples have already demonstrated chloride concentrations are below 600 mg/Kg and will not be analyzed for.
- Bullet point four is agreed upon. Confirmation samples will be collected as instructed and analyzed for BTEX and TPH. Delineation samples have already demonstrated chloride concentrations are below 600 mg/Kg and will not be analyzed for.
- All other bullet points are agreed upon.

We are wanting to start this project on October 27, 2017.

Thank You,

Becky Haskell
Senior HSE Coordinator

COG Operating LLC
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rhaskell@concho.com



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From: Green, Nikki [<mailto:NGreen@trcsolutions.com>]
Sent: Wednesday, October 18, 2017 9:19 AM
To: Yu, Olivia, EMNRD; Price, Henryetta
Cc: Rebecca Haskell; stucker@blm.gov; Billings, Bradford, EMNRD
Subject: [External] RE: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan

**** External email. Use caution. ****
Good Morning Olivia,

TRC, on behalf of COG Operating, LLC, agrees to collect confirmation soil samples from the floor and sidewalls of the excavated areas and will submit the soil samples to the laboratory for TPH and BTEX analysis.

Thank you,

Nikki Green
Project Manager



2057 Commerce Drive, Midland, TX 79703
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, October 04, 2017 2:08 PM
To: Price, Henryetta <hprice@blm.gov>; Green, Nikki <NGreen@trcsolutions.com>
Cc: Rebecca Haskell (RHaskell@concho.com) <RHaskell@concho.com>; stucker@blm.gov; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan

Dear Ms. Green:

NMOCD will consider vertical delineation completed for 1RP-4651, with the exception of area represented by the West Trench. Please address these concerns regarding the proposed remedial activities:

- Given the elevated TPH levels in the soil of the proposed area for excavation, soil blending is not permitted unless a scheduled resampling or monitoring plan is proposed.
- For the areas represented by Trench 1 and Trench 2, the proposed remedial action is accepted. Minimum of 3 confirmation samples at the edges of the impacted area are required to complete release characterization.
- For the area represented by Trench 3, a minimum of 1 confirmation bottom and 3 edge samples (border with Trench 2 area and North and South edges) are required.
- For the areas represented by Trench 4 and West Trench, the bottom confirmation samples for the proposed 6 ft. excavation area must demonstrate permissible levels of BTEX, TPH, and chlorides. If not, proceed to excavate to the next feet. Confirmation sidewall samples must be taken from all 4 sides.
- A scaled map with the locations of the confirmation samples demarcated is required.
- NMOCD requires all confirmation samples be discrete.

Please confirm or inform if clarification is required.

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: Price, Henryetta [<mailto:hprice@blm.gov>]

Sent: Friday, September 22, 2017 1:32 PM

To: Green, Nikki <NGreen@trcsolutions.com>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Rebecca Haskell (RHaskell@concho.com) <RHaskell@concho.com>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; stucker@blm.gov

Subject: Re: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan

Thank you for the clarification!

Work plan is approved. Need like approval from NMOCD.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

[Hprice@blm.gov](mailto:hprice@blm.gov)

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On Fri, Sep 22, 2017 at 1:20 PM, Green, Nikki <NGreen@trcsolutions.com> wrote:

Good Morning Ms. Price,

TRC, on behalf of COG, will excavate to approximately 6 ft. bgs in the area represented by Trench-4 and West Trench-1, as requested by BLM. We will collect one grab sample from the west side wall of the excavated area represented by Trench-4/West Wall-1. Following excavation activities and the blending of the excavated soil, one composite soil sample per every 100 cubic yards of soil will be collected and submitted to the laboratory for analysis. If the laboratory results indicate the soil is below NMOCD regulatory guidelines, the excavated soil will be utilized as backfill material. Please feel free to contact me with any additional questions.

Thank you,

Nikki Green
Project Manager



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From: Price, Henryetta [mailto:hprice@blm.gov]

Sent: Monday, September 18, 2017 6:50 PM

To: Green, Nikki <NGreen@trcsolutions.com>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Rebecca Haskell (RHaskell@concho.com) <RHaskell@concho.com>; tomas.oberding@state.nm.us; stucker@blm.gov

Subject: Re: 1RP-4651 - Gunslinger 11 Federal Com #001 Soil Investigation Summary and Proposed Remediation Workplan

Nikki,

Since the numbers drop between 5-8 ft. I am going to request to go another foot to get more of the contaminants out of there. Also, can you clarify the second bullet regarding confirmation samples. Are you going to take composite samples??

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

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* Tis the season for African Rue. Please do a 360 scan around your well locations and lease roads.

On Thu, Sep 7, 2017 at 7:55 AM, Green, Nikki <NGreen@trcsolutions.com> wrote:

Good Morning Ms. Yu and Ms. Price,

TRC, on behalf of COG Operating, LLC, has prepared the attached Soil Investigation Summary and Proposed Remediation Workplan for the Gunslinger 11 Federal Com #001 (API# 30-025-36797) Release Site. The legal description of the Release Site is Unit Letter "M", Section 11, Township 20 South, Range 33 East, in Lea County, New Mexico. Upon your approval, COG is prepared to begin the activities outlined in the attached Workplan. Please feel free to contact Becky Haskell or myself with any questions.

Thank you,

Nikki Green
Project Manager



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