

From: [Yu, Olivia, EMNRD](#)
To: ["Kimberly M. Wilson"](#)
Cc: ["Naranjo, Mark"](#); ["Michael Barrett"](#); ["David J. Adkins"](#)
Subject: RE: NVANU #73 - 1RP-4880 -
Date: Thursday, February 15, 2018 2:07:00 PM
Attachments: image001.png

Also, like approval from NMSLO required. NMSLO may have additional stipulations.

From: Yu, Olivia, EMNRD
Sent: Thursday, February 15, 2018 2:02 PM
To: 'Kimberly M. Wilson' <kwilson@talonlpe.com>
Cc: Naranjo, Mark <MNaranjo@slo.state.nm.us>; Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: NVANU #73 - 1RP-4880 -

Ms. Wilson:

Thanks for your prompt response. Yes; please send the elevations labelled with the same sample IDs when you have them. Backfill approval is granted for 1RP-4880.

In the closure report, also include photo documentation of the excavated areas and remedial activities (e.g., liner emplacement process, locations of the pipeline markers, backfilling, etc.).

Thanks,
Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Thursday, February 15, 2018 1:50 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Naranjo, Mark <MNaranjo@slo.state.nm.us>; Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: NVANU #73 - 1RP-4880 -

Olivia,

To answer some of you concerns:

- Yes, CS-36 to CS-38 are bottom samples at a depth of 2-feet deep within the B-4 area.
- When the sidewall samples were pulled and came back hot, an additional 2-feet was excavated horizontally until clean samples were obtained. The initial samples for those were going to be included in the Closure Report.
- We are in the process of shooting the grades for the excavation now and will get you the precise depths when I get them from the operators.
- The depths of that excavation will be on the closure site map, which I will send upon getting the excavation depths.

Thank you,
Kimberly

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, February 15, 2018 12:04 PM
To: Kimberly M. Wilson
Cc: Naranjo, Mark; Michael Barrett; David J. Adkins
Subject: RE: NVANU #73 - 1RP-4880 -

Dear Ms. Wilson:

Thank you for the information and data for 1RP-4880.

- Please verify whether CS-36 to CS-38 are bottom or sidewall samples.
- Did the repeat sampling of sidewalls CS-8, CS-15, & CS-25 (January 16, 2018) and CS-15 & CS-35 (January 19, 2018) refer to lateral extension of the excavated areas and samples taken at 2 ft. bgs?
- Were any samples taken from the deepest excavatable depths? 2.5 ft. bgs for B-1 area & 3.5 ft. bgs for B-2/B-3 area as marked on the maps. The data indicated all bottom samples were taken at 1.5 ft. bgs for B-1 area and 2 ft. bgs for B-2/B-3. If not, please provide rationale. Outline the approximate locations where these deeper excavatable depths were.

Thanks,
Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Thursday, February 8, 2018 2:10 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Naranjo, Mark <MNaranjo@slo.state.nm.us>; Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: NVANU #73 - 1RP-4880 -

Hello Olivia,

Attached please find the Data Table with the Confirmation Samples (CS) analysis and GPS Coordinates for the above referenced project, along with an updated Site Map indicating the sample locations. I've broken out the site map into 3 areas to enlarge for easier viewing. I've also attached the full laboratory results to compare with the information in the table.

Lime Rock Resources respectively request permission to begin backfilling so we can bring this matter to a close as soon as possible. All the confirmation samples for the sidewalls and bottom of the B-4 excavation are below the RRAL's limit of 600 mg/kg. We will be stockpiling topsoil in the area of B-4 (in purple) starting either tomorrow 2/9/2018 or Monday 2/12/2018.

Due to encountering rock, we were unable to reach total depth of the excavation in the area of B-1, B-2 and B-3. The area surrounding B-1 (in green) was excavated to depths between 2-feet and 2.5-feet deep. The NMOCD's approved work plan stated

this area was to be excavated a depth of 3-feet deep. The area around B-2 and B-3 (in red) was excavated to depths between 2.5-feet and 3.5-feet deep. The NMOCD's approved work plan stated this area was to be excavated a depth of 4-feet deep.

Per our onsite meeting, it was required to collect Bottom Samples (BS) from the open excavation, where depths were not reached, to indicated the total chlorides being left in place, under the 20 mil liner. The results from these samples are on Page 2 of the Data Table along with their GPS Coordinates and at what depth rock was hit.

We will place visible markers indicating the edges of the liner after the remediation is complete. This is to ensure that anyone doing work out in this area will be aware that the liner is less than 4-feet deep. The maker will have the company information, a phone number and the depth of the liner.

Please let me know if I've overlooked any information you've requested , if you have any questions or wish to discuss this matter further.

Kimberly

Kimberly M. Wilson

Project Manager

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

Sent: Wednesday, January 31, 2018 2:45 PM

To: David J. Adkins

Cc: Kimberly M. Wilson; Naranjo, Mark; Michael Barrett

Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Mr. Adkins:

Written documentation regarding the field visit on January 25, 2018, at the NVANU #73 site, still has not been received. These are the information that NMOCD requires for approval of the revised excavation depth from 4 ft. bgs to more shallow and variable depths for 1RP-4880:

- Affirmation statement attesting that deeper removal is not feasible with either a back or trackhoe and that the properly keyed minimal 20 mil liner will be cushioned to maintain integrity.
- Representative confirmatory bottom samples from maximum depths achieved for each of the excavated areas. Sidewalls will be required at no greater than 50 ft. apart.
- Highly visible markers, similar to those used for pipeline identification, at the edges of each area with contact information. This is to ensure that a pipeline operator will not encounter and damage the liner at less than 4 ft. bgs.

Please confirm.

Thanks,

Olivia

From: David J. Adkins [<mailto:dadkins@talonlpe.com>]
Sent: Tuesday, January 23, 2018 2:50 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Kimberly M. Wilson <kwilson@talonlpe.com>; Naranjo, Mark <MNaranjo@slo.state.nm.us>; Michael Barrett <mbarrett@limerockresources.com>
Subject: Re: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

We'll be there Olivia. Thanks so much.

Sent from my iPhone

On Jan 23, 2018, at 2:40 PM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Ms. Wilson:

I have adjusted my schedule for the morning of January 25. Please confirm meeting at 9 am MST at NVANU 73.

Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Tuesday, January 23, 2018 10:24 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>
Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Olivia,

Sorry I needed the meeting this Thursday January 25, 2017. David will not be town next week. We are shut down out at the NVANU #73 and cannot continue until we met with you. Can we please change to this Thursday?

Kimberly M. Wilson
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, January 23, 2018 7:31 AM
To: Kimberly M. Wilson; Naranjo, Mark
Cc: Michael Barrett; David J. Adkins
Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Good morning Ms. Wilson:

OK. Will meet at the NVANU #73 site on February 1, 2018 at 9 am MST.

Was a revised remediation plan submitted for 1RP-4880? Please be advised that confirmatory samples are still required. What were the maximum depths of removal for each of the impacted areas? Provide an appropriately scaled map and data table with the GPS coordinates demarcated and depths of excavation annotated.

This release differs from 1RP-4251 (NVANU #1 Battery) since there is an identified waterway < 1000 ft. to the East.

Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Monday, January 22, 2018 12:53 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>; Kegel, Conrad J. <ckegel@slo.state.nm.us>; Montoya, Kenda <KMontoya@slo.state.nm.us>; Honea, Tammy <thonea@slo.state.nm.us>
Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Olivia,

On behalf of Lime Rock Resources we are requesting an on-site meeting to discuss the areas where depths could not be reached due to hard rock, just like the NVANU #1 Battery. Since you are unaware of the conditions and history with the area, it would be helpful to have an on-site meeting. We were working with Jamie Keyes at the time.

Lime Rock would like to complete this project as soon as possible.

Respectfully,

Kimberly

Kimberly M. Wilson

Project Manager

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

Sent: Monday, January 22, 2018 10:39 AM

To: Kimberly M. Wilson; Naranjo, Mark

Cc: Michael Barrett; David J. Adkins; Kegel, Conrad J.; Montoya, Kenda; Honea, Tammy

Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Good morning Ms. Wilson:

NMOCD will not grant backfill approval until an appropriately scaled map demarcating confirmation sample locations and laboratory analyses of confirmation bottom and sidewalls samples are submitted for 1RP-4880.

For like approvals in the interim, Mark Naranjo will be the correspondent for NMSLO.

Thanks,

Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Monday, January 22, 2018 9:58 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Michael Barrett <mbarrett@limerockresources.com>; David J. Adkins <dadkins@talonlpe.com>; Kegel, Conrad J. <ckegel@slo.state.nm.us>; Montoya, Kenda <KMontoya@slo.state.nm.us>; Honea, Tammy <thonea@slo.state.nm.us>
Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Good morning Olivia,

We're ready to start backfilling at the above referenced location and would like to meet with you on site, Thursday, February 1, 2018 at 9:00 am. I have also left a voice message on your desk phone.

Thank you.

Kimberly

Kimberly M. Wilson
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, November 28, 2017 4:05 PM
To: Kimberly M. Wilson
Subject: RE: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Ms. Wilson:

I just received your voicemail. Do you have a particular question you would like addressed?

Thanks,

Olivia

From: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Tuesday, November 28, 2017 3:21 PM
To: Groves, Amber <agroves@slo.state.nm.us>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Michael Barrett <mbarrett@limerockresources.com>; Justin Thompson <jthompson@limerockresources.com>; Martin, Ed <emartin@slo.state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>; David Adkins <dadkins@talonlpe.com>
Subject: NVANU #73 - 1RP-4880 - Revegetation and Noxious Weed Management Plan

Amber,

Please find attached the Revegetation and Noxious Weed Management Plan for the above referenced location. We would like to begin remediation activities at this location next week.

Please let me know if you have any questions or concerns.

Thank you.

Respectfully submitted,

Kimberly

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From: Kimberly M. Wilson
Sent: Monday, November 27, 2017 9:29 AM
To: Groves, Amber; Yu, Olivia, EMNRD
Cc: Michael Barrett; David Adkins; Martin, Ed; Naranjo, Mark
Subject: RE: NVANU #73 initial C-141 & Work Plan

<image003.gif>

Good Morning,

Can we get a response on this work plan? Lime Rock Resources would like to begin this project as soon as possible so that it can be finished by the end of the year.

Thank you.

Kimberly M. Wilson
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From: Kimberly M. Wilson
Sent: Monday, November 20, 2017 11:46 AM
To: 'Groves, Amber'; 'Yu, Olivia, EMNRD'
Cc: 'Michael Barrett'; Justin Thompson; David Adkins; glen.henning@exxonmobil.com;
Martin, Ed; Naranjo, Mark
Subject: NVANU #73 initial C-141 & Work Plan

Good Afternoon,

Attached please find the initial C-141 and work plan for Lime Rock Resources' site, North Vacuum Abo North Unit (NVANU) #73.

Thank you.

Respectfully submitted,

Kimberly M. Wilson
Project Manager
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Cell: 575.602.3826
Fax: 575.746.8905
Emergency: 866.742.0742
Web:

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From: Groves, Amber [<mailto:agroves@slo.state.nm.us>]
Sent: Wednesday, November 15, 2017 3:12 PM
To: 'Michael Barrett'; Oberding, Tomas, EMNRD; Kimberly M. Wilson
Cc: Yu, Olivia, EMNRD; Justin Thompson; David Adkins; glen.henning@exxonmobil.com;
Martin, Ed; Naranjo, Mark
Subject: RE: NVANU's Initial C-141's for #1, #82, 5B #2, #73 OCD letter

Good Afternoon,

I received a notification from Talon on August 15, 2017 stating that delineation would be taking place at the NVANU #73. We still need a C-141 for this

release. I am also in need of an update for the status of the work plan since the delineation was done in August. Please advise as soon as possible.

Thank you,

<image004.png>**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 88240

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From: Michael Barrett [<mailto:mbarrett@limerockresources.com>]
Sent: Thursday, June 15, 2017 7:49 AM
To: Groves, Amber <agroves@slo.state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Kimberly M. Wilson <kwilson@talonlpe.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Justin Thompson <jthompson@limerockresources.com>; David Adkins <dadkins@talonlpe.com>; glen.henning@exxonmobil.com; Martin, Ed

<emartin@slo.state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Subject: RE: NVANU's Initial C-141's for #1, #82, 5B #2, #73 OCD letter

Here is the documents for the #82 & 5 #2.

I will have to go back through emails for correspondence on the #73

From: Groves, Amber [<mailto:agroves@slo.state.nm.us>]
Sent: Thursday, June 15, 2017 7:35 AM
To: Oberding, Tomas, EMNRD; Kimberly M. Wilson
Cc: Yu, Olivia, EMNRD; Justin Thompson; Michael Barrett; David Adkins;
glen.henning@exxonmobil.com; Martin, Ed; Naranjo, Mark
Subject: RE: NVANU's Initial C-141's for #1, #82, 5B #2, #73 OCD letter

Good Morning,

This e-mail is a follow up to Dr. Oberding's e-mail last spring regarding the #73 OCD letter. I do not seem to have the clear separation between Limerock and alleged Mobil infrastructure that was requested in this e-mail. If this was sent in to NMOCD, please provide a copy to me for my files. Also, as ExxonMobil is the lessee on record and Limerock the operator for ExxonMobil, can you please clarify the reason the lessee on record is responsible versus the operator for ExxonMobil?

Also, my records reflect that we are still awaiting the closure reports for the NVANU #82 and the NVANU 5B #2. I have that backfilling was approved on the 82 in July of last year and the work plan for the 5B #2 approved in May of last year. When can we expect those submittals?

Thank you,

<image005.png>**Amber Groves**

Remediation Specialist

Field Operations Division

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Hobbs, NM 88260

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From: Oberding, Tomas, EMNRD [<mailto:Tomas.Oberding@state.nm.us>]
Sent: Tuesday, April 19, 2016 2:49 PM
To: Kimberly M. Wilson <kwilson@talonlpe.com>; Groves, Amber <agroves@slo.state.nm.us>
Cc: Keyes, Jamie, EMNRD <Jamie.Keyes@state.nm.us>; jthompson@limerockresources.com; Michael Barrett <mbarrett@limerockresources.com>; David Adkins <dadkins@talonlpe.com>
Subject: RE: NVANU's Initial C-141's for #1, #82, 5B #2, #73 OCD letter

Aloha all,

Thank you for sending in these 141s. Mr. Keyes will provide the RPs in a forthcoming email.

Regarding the NVANU #73- The OCD requires definitive evidence that the contamination is not associated with Limerock operations on that site (verbal testimony is not acceptable).

A clear separation between Limerock and alleged Mobil infrastructure must be shown.

Upon receipt of this evidence the OCD will review the issue.

Mahalo

-Doc

Tomáš 'Doc' Oberding PhD

Hydrologist, Adv-District 1

Oil Conservation Division, EMNRD

(505) 476-3403

E-Mail: tomas.oberding@state.nm.us

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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: Kimberly M. Wilson [<mailto:kwilson@talonlpe.com>]
Sent: Monday, April 18, 2016 3:25 PM
To: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Groves, Amber <agroves@slo.state.nm.us>
Cc: Keyes, Jamie, EMNRD <Jamie.Keyes@state.nm.us>; jthompson@limerockresources.com; Michael Barrett <mbarrett@limerockresources.com>; David Adkins <dadkins@talonlpe.com>
Subject: NVANU's Initial C-141's for #1, #82, 5B #2, #73 OCD letter

Good Afternoon All,

Attached are the initial C-141's for the Lime Rock Resources North Vacuum Abo North Unit (NVANU) #1 Battery, #82 Battery and the 5B #2 flow line release We have drilled these three sites already and are awaiting analytical results. We will then generate the work plans.

Attached also is a letter from Lime Rock regarding NVANU #73.

Respectfully submitted,

Kimberly M. Wilson
Project Manager

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