

From: [Yu, Olivia, EMNRD](#)
To: ["John Zimmerman"](#)
Cc: [Rebecca Haskell](#); dneel2@concho.com; alieb@concho.com; [Ryan Reich](#)
Subject: RE: Azores Federal #002H 1RP-4149 Work Plan
Date: Friday, July 7, 2017 2:48:00 PM

Confirmed.

Olivia

From: John Zimmerman [mailto:jzimmerman@americansafety.net]
Sent: Friday, July 7, 2017 2:32 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Rebecca Haskell <RHaskell@concho.com>; dneel2@concho.com; alieb@concho.com; Ryan Reich <rreich@americansafety.net>
Subject: RE: Azores Federal #002H 1RP-4149 Work Plan

Ms. Yu,

Per your telephone discussion with Ms. Rebecca Haskell (COG) earlier today regarding the Delineation Work Plan for 1RP-4149, my understanding is NMOCD accepts COG's proposed modifications as follows:

1. Excavate to 4ft. bgs the entire release area prior to installation of the 20 ml. liner,
2. Collect sidewall samples (i.e., at surface and near base of the excavation) from the perimeter of the excavation per approved protocols to complete horizontal delineation, and
3. To satisfy NMOCD closure requirements, Method 300 for Chloride will be requested to analyze collected samples.

Please let me know if you have any questions.

Regards,

Jack

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, June 30, 2017 12:49 PM
To: John Zimmerman <jzimmerman@americansafety.net>; stucker@blm.gov
Cc: Rebecca Haskell <RHaskell@concho.com>; dneel2@concho.com; alieb@concho.com; jamos@blm.gov; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Ryan Reich <rreich@americansafety.net>
Subject: RE: Azores Federal #002H 1RP-4149 Work Plan

Dear Mr. Zimmerman:

NMOCD has several concerns regarding the delineation workplan for 1RP-4149. Although SP2 does not appear to be completely delineated vertically with no additional confirmatory depth of permissible chloride levels, especially due to the lag in release characterization (release date: January 18, 2016; sample date: August 12, 2016), NMOCD will accept the proposed remediation plan with several modifications.

1. Excavate to 6 ft. bgs for the entire release area and properly set with a minimal 20 mil liner.
2. Horizontal delineation was not completed. NMOCD requires sidewall and bottom confirmation samples at the edges of the excavation. Distance between sample locations must be no greater than 50 ft. apart. Permissible chloride levels are ≤ 600 mg/kg.
3. For closure, NMOCD requires Method 300 for chlorides to be utilized.

Please inform of decision.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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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: John Zimmerman [<mailto:jzimmerman@americansafety.net>]
Sent: Wednesday, June 14, 2017 9:46 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; stucker@blm.gov
Cc: Rebecca Haskell <RHaskell@concho.com>; dneel2@concho.com; alieb@concho.com; jamos@blm.gov; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Ryan Reich <rreich@americansafety.net>
Subject: Azores Federal #002H 1RP-4149 Work Plan

Ms. Yu and Ms. Tucker,

Attached please find for your review the Work Plan for the above referenced site. No field activities will begin until this Work Plan is accepted by all parties and all notifications have been submitted/accepted per site clearance and a work schedule has been agreed to.

Please let me know if you have any questions.

Regards,

Jack Zimmerman, PG, CPG
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