

**From:** Tucker, Shelly  
**To:** [Rebecca Haskell](#)  
**Cc:** [Yu, Olivia, EMNRD](#); [John Zimmerman](#); [Dakota Neel](#); [Aaron Lieb](#); [jamos@blm.gov](mailto:jamos@blm.gov); [Oberding, Tomas, EMNRD](#); [Ryan Reich](#)  
**Subject:** Re: [External] RE: Azores Federal #002H 1RP-4149 Work Plan  
**Date:** Saturday, July 8, 2017 12:33:35 PM

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**BLM has reviewed the work plan and agrees with the NMOCD stipulations. You are cleared to proceed with remedial activities with the proposed stipulations.**

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

*Shelly J Tucker*

Environmental Protection Specialist  
O&G Spill/Release Coordinator

Bureau of Land Management  
620 E. Greene St  
Carlsbad, NM 88220

575.234.5905 - Direct  
575.361.0084 - Cellular  
575.234.6235 - Emergency Spill Number

[stucker@blm.gov](mailto:stucker@blm.gov)

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. In such an event that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues are fully mitigated and the location is successfully reclaimed. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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On Fri, Jul 7, 2017 at 2:12 PM, Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)> wrote:

Thank you Olivia, I appreciate it.

Sent from my iPhone

On Jul 7, 2017, at 2:36 PM, Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)> wrote:

\*\*\*\* External email. Use caution. \*\*\*\*

Dear Ms. Haskell:

As per our phone conversation today, NMOCD agrees to these modifications to the stipulated concerns in the email message, dated June 30, 2017, for 1RP-4149.

1. Adjustment of the depth of excavation to 4 ft. bgs before the placement of a liner.
2. Bottom confirmation samples are not needed under the lined area.
3. Sidewall samples are required at the surface and near the base of the excavation to permissible chloride levels to verify that horizontal delineation has been completed.

Thanks,

Olivia

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**From:** Yu, Olivia, EMNRD  
**Sent:** Friday, June 30, 2017 11:49 AM  
**To:** 'John Zimmerman' <[jjzimmerman@americansafety.net](mailto:jjzimmerman@americansafety.net)>; [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; [dneel2@concho.com](mailto:dneel2@concho.com); [alieb@concho.com](mailto:alieb@concho.com); [jamos@blm.gov](mailto:jamos@blm.gov); Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>; Ryan Reich <[rreich@americansafety.net](mailto: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  $\leq 600$  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

[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:** John Zimmerman [<mailto:jzimmerman@americansafety.net>]  
**Sent:** Wednesday, June 14, 2017 9:46 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; [stucker@blm.gov](mailto:stucker@blm.gov)  
**Cc:** Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; [dneel2@concho.com](mailto:dneel2@concho.com);  
[alieb@concho.com](mailto:alieb@concho.com); [jamos@blm.gov](mailto:jamos@blm.gov); Oberding, Tomas, EMNRD  
<[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>; Ryan Reich <[rreich@americansafety.net](mailto: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

Senior Geologist

American Safety Services, Inc.

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432-363-0198 (FAX)

432-557-6195 (Cell)

[jjzimmerman@americansafety.net](mailto:jjzimmerman@americansafety.net)

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