From:	Yu, Olivia, EMNRD
To:	<u>"Ben J. Arguijo"</u>
Cc:	Todd Roberson; Andy Rickard; Denise Jones
Subject:	RE: FW: Emailing - GRAND BANKS 001.pdf
Date:	Tuesday, February 20, 2018 11:59:00 AM
Attachments:	1RP4970.pdf

Mr. Arguijo:

Please note that this release occurred within 1000 ft. of an identified probable playa, which is a surface waterbody of NM.

The 1RP for this incident is

					30-025-		
4970	2/20/2018	А	Grand Banks	ARU #14	00365	16S-32E-2I	5/16/2017

Please remember to include this 1RP identifier to all communications. Also, please be advised that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 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: Ben J. Arguijo [mailto:ben@trinityoilfieldservices.com]
Sent: Wednesday, February 7, 2018 3:19 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Todd Roberson <todd@trinityoilfieldservices.com>; Andy Rickard <arickard@cambrianmgmt.com>; Denise Jones
<djones@cambrianmgmt.com>
Subject: Re: FW: Emailing - GRAND BANKS 001.pdf

Ms. Yu,

Trinity Oilfield Services has been contracted by Cambrian Management to remediate the release referred to in the email thread below (i.e., Grand Banks ARU #14, 5/16/17).

In the thread, there is reference to an incomplete/inadequate initial C-141 being submitted to Tomas Oberding on 5/30/2017, as well as a message from Denise Jones (Cambrian) that a revised C-141 was to be submitted on 7/12/17. There is also a follow-up message from you to Andy Rickard (Cambrian) on 7/26/17 stating that you would be sending him "...*a more recent message with delineation requirements*." However, I can't find any of this documentation in the NMOCD imaging system, and it appears that a 1RP number was never assigned to the release.

I have attached the original C-141, dated 5/25/17, which was submitted to Mr. Oberding, along with an updated C-141 that includes the approximate square footage of the area affected by the release, include the overspray and the flow path in the adjacent pasture. The exact volume of the release is unknown, so it is simply listed as being greater than (>) 5 barrels.

If I am mistaken and there HAS been a 1RP # assigned to this release, please forward the number to me for my records. Also, please apprise me of the appropriate NMSLO contact for this site.

If you should have any questions, comments, or concerns, please do not hesitate to contact me by telephone or email.

Thank you for your time and consideration.

Respectfully, Ben J. Arguijo

Ben J. Arguijo Environmental Project Manager Trinity Oilfield Services P.O. Box 2587 Hobbs, NM 88241 (575)390-7208 ben@trinityoilfieldservices.com

On Thu, Oct 26, 2017 at 12:47 PM, Todd Roberson <<u>todd@trinityoilfieldservices.com</u>> wrote:

---------Forwarded message -------From: Andy Rickard <<u>arickard@cambrianmgmt.com</u>> Date: Thu, Oct 26, 2017 at 1:34 PM Subject: FW: Emailing - GRAND BANKS 001.pdf To: Todd Roberson <<u>todd@trinityoilfieldservices.com</u>>, Denise Jones <<u>djones@cambrianmgmt.com</u>> CC: <u>agroves@slo.state.nm.us</u> <<u>agroves@slo.state.nm.us</u>>

From: Groves, Amber [mailto:agroves@slo.state.nm.us]
Sent: Wednesday, October 25, 2017 5:32 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; Andy Rickard <<u>arickard@cambrianmgmt.com</u>>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Good Afternoon,

I am just following up on this as I am not showing that I ever received the updated C-141 that was requested. When can we expect the submittal?

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 88240

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From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Wednesday, July 26, 2017 2:07 PM
To: arickard@cambrianmgmt.com
Cc: Groves, Amber agroves@slo.state.nm.us
Subject: FW: Emailing - GRAND BANKS 001.pdf

Dear Mr. Rickard:

Nice to speak with you earlier. Please see the below email thread. I will forward you a more recent message with delineation requirements.

Thanks, Olivia

From: Groves, Amber [mailto:agroves@slo.state.nm.us]
Sent: Wednesday, July 12, 2017 9:41 AM
To: Denise Jones <djones@cambrianmgmt.com>
Cc: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Denise,

As you can see from the photos that I have attached, when I visited the location the ground contamination was not cleaned up. Picture number 4034 shows that there was fresh caliche put on top of the spill and it is soaking back up through it. Picture number 4039 shows that the release flowed into the previous release area and was not remediated either. I am going to request a full site delineation with a work plan to be submitted once that has been done regardless of amount released due to the size of the spill. The overspray will also need to be delineated.

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: Denise Jones [mailto:djones@cambrianmgmt.com]
Sent: Wednesday, July 12, 2017 9:16 AM
To: Groves, Amber <agroves@slo.state.nm.us>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Amber – I will submit a new C-141 today. I was told the spill was less than 5 bbls but have talked to our field personnel and was told that he still believes there was not much (if any) more than 5 bbls. What should we put on the C-141? Will 5 bbls with a small amount of overspray be sufficient? Also, we would like to fulfill our responsibility to clean up the area properly – what do you require as far as clean up goes for the overspray? It is my understanding the ground contamination has already been cleaned up and just the overspray is the only residual contamination left.

Thank you for all of your help!

Denise Jones

Regulatory Analyst Cambrian Management, Ltd PO Box 272 Midland, TX 79702 432-620-9181 432-570-0102 (fax) djones@cambrianmgmt.com

From: Groves, Amber [mailto:agroves@slo.state.nm.us] Sent: Wednesday, July 12, 2017 10:01 AM To: Yu, Olivia, EMNRD; Denise Jones Subject: RE: Emailing - GRAND BANKS 001.pdf

Ms. Jones,

It has been over 30 days since a revised C-141 was requested and two weeks since a reminder sent. When can the C-141 be expected?

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: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Wednesday, June 28, 2017 2:36 PM
To: djones@cambrianmgmt.com
Cc: Groves, Amber <a groves@slo.state.nm.us>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Ms. Jones:

NMOCD still requires a revised initial C-141 regarding the reportable release on May 16, 2017. There is evidence of overspray and impact to pasture.

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> <u>575-393-6161 x113</u> 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: Yu, Olivia, EMNRD
Sent: Tuesday, June 6, 2017 5:35 PM
To: 'djones@cambrianmgmt.com' <djones@cambrianmgmt.com>
Cc: Oberding, Tomas, EMNRD <<u>Tomas.Oberding@state.nm.us</u>>; 'Groves, Amber' <<u>agroves@slo.state.nm.us</u>>; Billings, Bradford,
EMNRD <<u>Bradford.Billings@state.nm.us</u>>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Dear Ms. Jones:

NMOCD was informed with photo documentation that the release at Anderson Ranch Unit #014 was larger than 5 bbls. Please submit a modified initial C141.

Thanks, Olivia

From: Yu, Olivia, EMNRD
Sent: Wednesday, May 31, 2017 7:21 AM
To: djones@cambrianmgmt.com
Cc: Oberding, Tomas, EMNRD <<u>Tomas.Oberding@state.nm.us</u>>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Dear Ms. Jones:

Please see the attachment for your records.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> <u>575-393-6161 x113</u>

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: Oberding, Tomas, EMNRD
Sent: Tuesday, May 30, 2017 2:19 PM
To: djones@cambrianmgmt.com
Cc: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Subject: RE: Emailing - GRAND BANKS 001.pdf

Ms. Jones,

Thank you for providing the C-141 for the spill on the Anderson Ranch #14 for May 16th.

Please note that electronic copies of C-141s are the preferred method of receipt of these and all communications. The C-141 is incomplete in that the surface owner, Mineral owner and API are not provided.

As this spill was less than 5bbls this document is accepted for record only.

Please keep us informed of any changes to the site and let me know if you have questions. Mahalo -Dr. Oberding

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: Casillas, Bertha, EMNRD
Sent: Tuesday, May 30, 2017 1:46 PM
To: Houston, Kristen, EMNRD <<u>Kristen.Houston@state.nm.us</u>>
Cc: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; Oberding, Tomas, EMNRD <<u>Tomas.Oberding@state.nm.us</u>>
Subject: Emailing - GRAND BANKS 001.pdf

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Todd Roberson Trinity Oilfield Services & Rentals, LLC.