From:
 Clay, Bryan W

 To:
 Yu, Olivia, EMNRD

 Subject:
 FW: [EXTERNAL]RE: Buck Fed Deferment Report

 Date:
 Monday, December 18, 2017 7:04:25 AM

 Attachments:
 Conoco Phillips Red Hills West State 16 Lab ReportAug 17, 2017.pdf

Ms. Yu,

The samples pulled in May 2017 were field analysis only. When we met on August 25, 2017, you instructed me to pull confirmation samples, add a plot map with spill dimensions and confirm ground water depth with the NM State Engineering office. I sent the initial deferment report but you stated it was incomplete. We then decided to go back to the release site and resample starting at the ~ 0 – 6" surface sample and delineate to 7'. These samples were pulled within 1' of the initial delineation. We did remove 3" (~ 40 cu/yd) of material impacted during the 1RP-4262 release but have not conducted any further excavation on this site. I there are any additional questions or information needed, please let me know.

Regard,

Bryan Clay

Project Supervisor Permian Shale/ Unconventional Bryan.W.Clay@ConocoPhillips.com Office: (432) 688-9063 Cell: (432) 213-3376

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, December 8, 2017 3:53 PM
To: Clay, Bryan W <<u>Bryan.W.Clay@conocophillips.com</u>>; Shelly Tucker <<u>stucker@blm.gov</u>>
Cc: Neuschafer, Michael P <<u>Michael.P.Neuschafer@conocophillips.com</u>>; McLaughlin, Joseph P
<<u>Joe.P.McLaughlin@conocophillips.com</u>>; Acosta Quintero, Wendy
<<u>Wendy.AcostaQuintero@conocophillips.com</u>>
Subject: [EXTERNAL]RE: Buck Fed Deferment Report

Dear Mr. Clay:

Several concerns regarding the request for deferment for 1RP-4431 and 1RP-4262:

- 1. Please provide the complete laboratory results with chain of command for the sample locations indicated on page 2 of the report.
- 2. Were the soil samples taken on May 2, 2017 from the same locations as on October 19, 2017?
- 3. Were the samples labeled as 'surface' taken several inches below pre-release surface? If

available, please provide depth or an estimate of the volume of impacted soil initially removed.

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: Clay, Bryan W [mailto:Bryan.W.Clay@conocophillips.com]
Sent: Tuesday, November 14, 2017 11:56 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Neuschafer, Michael P <<u>Michael.P.Neuschafer@conocophillips.com</u>>; McLaughlin, Joseph P
<<u>Joe.P.McLaughlin@conocophillips.com</u>>; Acosta Quintero, Wendy
<<u>Wendy.AcostaQuintero@conocophillips.com</u>>
Subject: FW: Buck Fed Deferment Report

Ms. Yu,

Here is the information we discussed for closing the Buck Federal Battery release site. If you have any questions, please do not hesitate to give me a call.

Bryan Clay

Project Supervisor Permian Shale/ Unconventional Bryan.W.Clay@ConocoPhillips.com Office: (432) 688-9063 Cell: (432) 213-3376

From: Clay, Bryan W [mailto:Bryan.W.Clay@conocophillips.com]
Sent: Tuesday, November 14, 2017 12:27 PM
To: Clay, Bryan W <<u>Bryan.W.Clay@conocophillips.com</u>>

Subject: Buck Fed Deferment Report



PERMIAN BASIN ENVIRONMENTAL LAB, LP 1400 Rankin Hwy Midland, TX 79701

1RP-4262 & 1RP-4431.



Analytical Report

Prepared for:

Von Norman Stingray Environmental & Construction 11420 W County Rd 33 Midland, TEXAS 79707

Project: Concho Phillips Red Hills West State 16 Project Number: Concho Phillips Red Hills West State 16 Location:

Lab Order Number: 7H07013



NELAP/TCEQ # T104704516-16-7

Report Date: 08/17/17

Project:Concho Phillips Red Hills West State 16Project Number:Concho Phillips Red Hills West State 16Project Manager:Von Norman

Fax:

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
WW 2'	7H07013-01	Soil	08/04/17 11:56	08-07-2017 14:15
NW 2'	7H07013-02	Soil	08/04/17 12:20	08-07-2017 14:15
EW 2'	7H07013-03	Soil	08/04/17 12:38	08-07-2017 14:15
SW 2'	7H07013-04	Soil	08/04/17 12:50	08-07-2017 14:15

WW 2'

	7H07013-01 (Soil)										
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes		
	Permia	n Basin F	Environme	ntal Lab, l	L .P.						
General Chemistry Paramete	ers by EPA / Standard Methods										
Chloride	2670	26.6	mg/kg dry	25	P7H0910	08/09/17	08/13/17	EPA 300.0			
% Moisture	6.0	0.1	%	1	P7H0809	08/08/17	08/08/17	ASTM D2216			

% Moisture

Project: Concho Phillips Red Hills West State 16 Project Number: Concho Phillips Red Hills West State 16 Project Manager: Von Norman

1

P7H0809

08/08/17

Fax:

ASTM D2216

08/08/17

			NW 2' 013-02 (So	il)					
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
	Permia	n Basin E	Environme	ntal Lab, I					
General Chemistry Paramete	ers by EPA / Standard Methods								
Chloride	242	1.18	mg/kg dry	1	P7H0910	08/09/17	08/13/17	EPA 300.0	

%

0.1

15.0

Permian Basin Environmental Lab, L.P.

% Moisture

Project: Concho Phillips Red Hills West State 16 Project Number: Concho Phillips Red Hills West State 16 Project Manager: Von Norman

1

P7H0809

08/08/17

08/08/17

ASTM D2216

Fax:

EW 2' 7H07013-03 (Soil)									
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
	Permian Basin Environmental Lab, L.P.								
General Chemistry Parameters by	General Chemistry Parameters by EPA / Standard Methods								
Chloride	338	10.9	mg/kg dry	10	P7H0910	08/09/17	08/13/17	EPA 300.0	

%

0.1

8.0

Permian Basin Environmental Lab, L.P.

% Moisture

Project: Concho Phillips Red Hills West State 16 Project Number: Concho Phillips Red Hills West State 16 Project Manager: Von Norman

1

P7H0809

08/08/17

08/08/17

ASTM D2216

Fax:

			SW 2')13-04 (So	oil)					
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
	Permian	Basin E	nvironme	ntal Lab, l	L .P.				
General Chemistry Parameter	ters by EPA / Standard Methods								
Chloride	726	26.3	mg/kg dry	25	P7H0910	08/09/17	08/13/17	EPA 300.0	

%

0.1

5.0

Permian Basin Environmental Lab, L.P.

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Permian Basin Environmental Lab, L.P.

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch P7H0809 - *** DEFAULT PREP ***										
Blank (P7H0809-BLK1)				Prepared &	a Analyzed	l: 08/08/17				
% Moisture	ND	0.1	%							
Duplicate (P7H0809-DUP1)	Sou	rce: 7H07006	-21	Prepared &	a Analyzed	l: 08/08/17				
% Moisture	ND	0.1	%		ND				20	
Duplicate (P7H0809-DUP2)	Sou	rce: 7H07013	-04	Prepared &	a Analyzed	l: 08/08/17				
% Moisture	6.0	0.1	%		5.0			18.2	20	
Batch P7H0910 - *** DEFAULT PREP ***										
Blank (P7H0910-BLK1)				Prepared: (08/09/17 A	Analyzed: 08	8/13/17			
Chloride	ND	1.00	mg/kg wet							
LCS (P7H0910-BS1)				Prepared: (08/09/17 A	Analyzed: 08	8/13/17			
Chloride	375	1.00	mg/kg wet	400		93.8	80-120			
LCS Dup (P7H0910-BSD1)				Prepared: ()8/09/17 A	Analyzed: 08	8/13/17			
Chloride	390	1.00	mg/kg wet	400		97.6	80-120	4.03	20	
Duplicate (P7H0910-DUP1)	Sou	rce: 7H07010	-01	Prepared: ()8/09/17 A	Analyzed: 08	8/13/17			
Chloride	752	5.62	mg/kg dry		793			5.29	20	
Duplicate (P7H0910-DUP2)	Sou	rce: 7H07012	-07	Prepared: (08/09/17 A	Analyzed: 08	8/13/17			
Chloride	2940	26.3	mg/kg dry		2830			3.62	20	
Matrix Spike (P7H0910-MS1)	Sou	rce: 7H07010	-01	Prepared: ()8/09/17 A	Analyzed: 08	8/13/17			
Chloride	2300	5.62	mg/kg dry	1120	793	134	80-120			QM-

Permian Basin Environmental Lab, L.P.

Notes and Definitions

- QM-05 The spike recovery was outside acceptance limits for the MS and/or MSD due to matrix interference. The LCS and/or LCSD were within acceptance limits showing that the laboratory is in control and the data is acceptable.
- BULK Samples received in Bulk soil containers
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference
- LCS Laboratory Control Spike
- MS Matrix Spike
- Dup Duplicate

Report Approved By:

Bun Barron

8/17/2017

Brent Barron, Laboratory Director/Technical Director

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

If you have received this material in error, please notify us immediately at 432-686-7235.

Permian Basin Environmental Lab, L.P.

The results in this report apply to the samples analyzed in accordance with the samples received in the laboratory. This analytical report must be reproduced in its entirety, with written approval of Permian Basin Environmental Lab.

Date:

