

From: [Yu, Olivia, EMNRD](#)
To: ["Gregory B. Gregson"](#)
Cc: [Mann, Ryan](#); [Hernandez, Christina, EMNRD](#)
Subject: RE: 1RP 4858 - State No. 30,-1 Lea Co., NM,
Date: Friday, June 8, 2018 7:44:00 AM

Good morning Mr. Gregson:

NMOCD conducted a site visit at release location yesterday, June 7, 2018. There is no evidence that the liner surrounds the entire footprint under the water tank, including the identified sampling locations that exceeds permissible levels for 1RP-4858. As the water tank will be removed, what is the rationale for incompleteness of delineation for the impacted area?

Please clarify to which previously sampled depth to 10 ft. bgs is in reference. Soil samples collected on March 23, 2018 did not include any data at depths greater than 6 inches.

To reiterate, as mentioned in the email dated April 30, 2018, laboratory analyses demonstrate chloride levels exceed acceptable limits for NMOCD-approved landfarms. Please review NMAC 19.15.36.15.

Thanks,
Olivia

-----Original Message-----

From: Gregory B. Gregson <ggregson@marklshidlerinc.com>
Sent: Wednesday, June 6, 2018 10:20 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 1RP 4858 - State No. 30,-1 Lea Co., NM,

Dear Ms. Yu:

The lion share of the oil contaminated soil will be removed from the above Re location (as previously established by sample analysis) to the land farm beginning Friday.

Today the open top fiberglass water tank is being emptied for re-location (vacuum truck(s) & lease crew efforts). If the fiberglass water tank is unsuitable for continued use, the same will be removed from the production facility and replaced with another suitable vessel.

As the soil surrounding this tank (Sample No.'s 5, 6, 11 & 13) contained various quantities exceeding permissible levels, please allow MLSI to assume (from a sampling of the aforementioned four locations) a median level of contamination requiring remediation which exceeds a depth of 0.50'. Based upon the previously submitted sampling interval of 10', only one (1) additional sample would be necessary.

I look forward to receiving your reply.

Best Regards,

Gregory B. Gregson
Operations Manager

Mark L. Shidler, Inc. - Petroleum Exploration & Production
1313 Campbell Rd., Bldg. D
Houston, TX 77055
Direct: (713) 481-6487
Main: (713) 222-9291
Fax: (713) 224-5523

-----Original Message-----

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

Sent: Tuesday, June 05, 2018 12:57 PM
To: Gregory B. Gregson <ggregson@MarkLShidlerInc.com>
Cc: rmann@slo.state.nm.us
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

19.15.29.11

CORRECTIVE ACTION: The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC.

-----Original Message-----

From: Gregory B. Gregson <ggregson@marklshidlerinc.com>
Sent: Tuesday, June 5, 2018 11:29 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

Dear Ms. Yu:
Please provide the NMOCD regulation requiring such documentation.

Best Regards,

Gregory B. Gregson
Operations Manager

Mark L. Shidler, Inc. - Petroleum Exploration & Production
1313 Campbell Rd., Bldg. D
Houston, TX 77055
Direct: (713) 481-6487
Main: (713) 222-9291
Fax: (713) 224-5523

-----Original Message-----

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Tuesday, June 05, 2018 12:24 PM
To: Gregory B. Gregson <ggregson@MarkLShidlerInc.com>
Cc: rmann@slo.state.nm.us
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

Mr. Gregson:

Thank you for the photo. As mentioned below, NMOCD requires photos of the entire liner in the facility, including documentation of the liner in relation to the release area, for evaluation of liner integrity and to assess whether additional delineation will be required for IRP-4858.

Thanks,
Olivia

-----Original Message-----

From: Gregory B. Gregson <ggregson@marklshidlerinc.com>
Sent: Tuesday, June 5, 2018 10:18 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

Dear Ms. Yu:
Please find attached a photograph evidencing the presence of a polymer liner located within the firewall of the above

Re production facility.

Best Regards,

Gregory B. Gregson
Operations Manager

Mark L. Shidler, Inc. - Petroleum Exploration & Production
1313 Campbell Rd., Bldg. D
Houston, TX 77055
Direct: (713) 481-6487
Main: (713) 222-9291
Fax: (713) 224-5523

-----Original Message-----

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Friday, May 11, 2018 9:28 AM
To: Gregory B. Gregson <ggregson@MarkLShidlerInc.com>
Cc: Mann, Ryan <rmann@slo.state.nm.us>
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

Good morning Mr. Gregson:

Thank you for the map with the sample locations demarcated and GPS coordinates of sample locations for IRP-4858.

If the entire facility is lined, NMOCD requires a statement of liner integrity and photo documentation of the intact liner during installation. If photos are not available, please inform NMOCD at least 2 workdays in advance of activities to remove impacted material on top of the liner.

If the facility is only partially under the leaking tank, then additional delineation will be required. Specifically, these areas: center, represented by sample location 5 & 6, and the Southeast corner (sample locations 11-13). Samples from 0.5 ft. bgs exceed permissible chlorides of 600 mg/kg at SP 5, 6, 11 & 13 and permissible TPH extended of 1000 mg/kg at SP 11 & 12.

NMSLO may have additional concerns or stipulations.

Thanks,
Olivia

-----Original Message-----

From: Yu, Olivia, EMNRD
Sent: Tuesday, May 1, 2018 7:40 AM
To: 'Gregory B. Gregson' <ggregson@marklshidlerinc.com>
Cc: 'Mann, Ryan' <rmann@slo.state.nm.us>
Subject: RE: IRP 4858 - State No. 30,-1 Lea Co., NM,

Good morning Mr. Gregson:

No. The map marked with Sample Locations was not previously submitted. As this release occurred on State surface and mineral ownership, please be advised that NMSLO must be included in all email communications and submittals.

Thanks,
Olivia

-----Original Message-----

From: Gregory B. Gregson <ggregson@marklshidlerinc.com>
Sent: Monday, April 30, 2018 2:28 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: IRP 4858 - State No. 30,-1 Lea Co., NM,

Dear Ms. Yu:

Perhaps I did not provide you this map setting out the thirteen sample station (on February 8, 2018) for the above Re cleanup. The table containing the location of these samples will be forthcoming. I apologize for my oversight.

Best wishes,

Gregory B. Gregson
Operations Manager

Mark L. Shidler, Inc. - Petroleum Exploration & Production
1313 Campbell Rd., Bldg. D
Houston, TX 77055
Direct: (713) 481-6487
Main: (713) 222-9291
Fax: (713) 224-5523

-----Original Message-----

From: Mark L. Shidler, Inc. - HP Scanner <copyroom@marklshidlerinc.com>
Sent: Monday, April 30, 2018 3:03 PM
To: Gregory B. Gregson <ggregson@MarkLShidlerInc.com>
Subject: New HP Scan

A scan has been sent to you from the HP M680z in the copy room.

-MLSI