

From: [Yu, Olivia, EMNRD](mailto:Yu.Olivia.EMNRD)
To: "[Kyle Townsend](mailto:Kyle.Townsend)"; "[Tucker, Shelly](mailto:Tucker.Shelly)"
Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation
Date: Wednesday, August 9, 2017 7:19:00 AM

Mr. Townsend:

OK. Thank you for the update. Please inform NMOCD of progress when available.

Olivia

From: Kyle Townsend [<mailto:kyle@pogooilandgas.com>]
Sent: Tuesday, August 8, 2017 5:20 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>
Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

Olivia,

Our initial 3rd party environmental service was not performing up to our standards and we have resumed proper delineation work using Mark Larson with Larson & Associates out of Midland. They have started their reports and you should be seeing something very soon.

Thanks,
Kyle

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, August 8, 2017 8:11 AM
To: Kyle Townsend <kyle@pogooilandgas.com>; 'Tucker, Shelly' <stucker@blm.gov>
Cc: mymerch@penrocoil.com
Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

Good morning Mr. Townsend:

Please inform NMOCD of the status of delineation for 1RP-4616 and 1RP4617.

Thanks,
Olivia

From: Kyle Townsend [<mailto:kyle@pogooilandgas.com>]
Sent: Tuesday, April 25, 2017 12:24 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>
Cc: mymerch@penrocoil.com
Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

I confirm, and we spoke on phone to make sure were on the same page.

Thank you,
Kyle Townsend

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

Sent: Tuesday, April 25, 2017 1:15 PM

To: Kyle Townsend <kyle@pogooilandgas.com>; 'Tucker, Shelly' <stucker@blm.gov>

Cc: mymerch@penrocoil.com

Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

Dear Mr. Townsend:

Please be advised that the proposed delineation depth of 2 ft. for 1RP-4616 and 1RP-4617 is likely insufficient. Additional vertical delineation at each of the sample points within the affected area with depth intervals no greater than 5 ft. will be required before remediation can proceed. Please confirm.

Thanks,
Olivia

From: Kyle Townsend [<mailto:kyle@pogooilandgas.com>]

Sent: Thursday, April 20, 2017 10:44 PM

To: 'Tucker, Shelly' <stucker@blm.gov>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: mymerch@penrocoil.com

Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

Good evening Olivia and Shelly,

Please find the attached delineation reports 4616 and 4617. Once sampling is completed and results returned from Cardinal, they will be documented in a subsequent report for you to review and remediation can begin.

Let me know if you have any questions,

Kyle Townsend
713-305-9886

From: mymerch@penrocoil.com [<mailto:mymerch@penrocoil.com>]

Sent: Monday, April 17, 2017 7:51 PM

To: Tucker, Shelly <stucker@blm.gov>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Kyle Townsend <kyle@pogooilandgas.com>

Subject: RE: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation



Shelly: Kyle is out this week. He will attend to it after his return or may be while he is out. Thanks.

M.Y. (MERCH) MERCHANT
PRESIDENT

"We are what we repeatedly do. EXCELLENCE, then, is not an act, but a habit." Aristotle

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

Subject: Re: 1R-4616 and 1R-4617 Workplan Submissions -
Penroc Oil
Corporation
From: "Tucker, Shelly" <stucker@blm.gov>
Date: Mon, April 17, 2017 1:42 pm
To: "Yu, Olivia, EMNRD" <Olivia.Yu@state.nm.us>
Cc: Kyle Townsend <kyle@pogooilandgas.com>, Merch Merchant
<mymerch@penrocoil.com>

Would you please forward me the spill reports and or work plans so I can
figure out what location(s) this is in regards to?

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

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 Tue, Mar 14, 2017 at 9:38 AM, Yu, Olivia, EMNRD
<Olivia.Yu@state.nm.us> wrote:

Dear Mr. Townsend:

The delineation workplans for 1R-4616 and 1RP-4617 are missing essential information required by the conditions of approval (COA) that was attached to the reviewed initial C-141. Also, according to NMOCD database, these releases occurred on BLM land. Please include Shelly Tucker in all communication.

As detailed in the COA, at a minimum, I am looking for these items in order to facilitate review of the delineation report:

1. Scaled, preferably digital, map of the site with location of release, locations of proposed or actual sample points, and dimensions of the release demarcated. You can either mark on the map or provide a table on a subsequent page of sample points and respective GPS coordinates.
2. A) Documentation of depth to groundwater search. Go to <http://nmwrrs.ose.state.nm.us/nmwrrs/waterColumn.html>

You may search with PLSS, but optimally use the UTM NAD83 radius search. Use the UTM conversion tool to get GPS coordinates in lat/long degrees into UTM coordinates. Use a radius of 2000 m and 5000 m. Output the report in pdf format. Check the Chevron Trend Map for Lea County as well and use the conservative value from both sources to determine water table depth.

B) Check on a topographical map and report distance to surface water body and water source.

3. Tabulate field and analytical results for chlorides, BTEX, and TPH with IDs and depth of samples. Put the lab analyticals and chain of command afterwards or in an appendix.
4. Georeferenced photos in tiff, jpg, jpeg etc. format if available. This is easiest if photos are taken with a smartphone with GPS location activated. Otherwise, provide photos that were taken from the same spot pre- and post-cleanup.
5. Attach a copy of the reviewed initial C141.
6. Like approval from BLM will be required.

A proposed plan of action can be suggested based on the preliminary delineation results, but NMOCD reserves the right to request further

vertical/horizontal delineation or alternate remediation plans. Also, please inform NMOCD when field sampling to provide witnessing opportunities and guidance.

You may request a meeting if you have questions or want additional clarification.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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.

From: Kyle Townsend
[mailto:kyle@pogooilandgas.com]
Sent: Sunday, February 26, 2017 9:22 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Merch Merchant' <mymerch@penrocoil.com>
Subject: 1R-4616 and 1R-4617 Workplan Submissions - Penroc Oil Corporation

Dear Ms. Yu,

Please see the attached delineation/remediation workplans for case numbers 1R-4616 and 1R-4617. Penroc Oil Corporation respectfully requests the NMOCD's approval of these workplans in order to begin remediation. After completion of the remediation, Penroc will submit a follow-up / closure report detailing the work in an effort to close these regulatory cases.

Thank you and have a great day,

Kyle Townsend
Pogo Oil and Gas, LLC
(713) 305-9886
203 West Wall Street, Suite 512

Midland, TX 79701