Mr. Wacker:

Thank you for the water analyses, dated August 24, 2017, of the produced water in the tanks.

Several comments about the proposed delineation for 1RP-4980.

- 1. This release occurred within the bermed tank battery (primary firewall) and on well pad location. More than one soil bore is needed to complete release characterization.
- 2. On a scaled map, please outline the release area and mark the release point. If available, provide photo documentation of the release area for verification.
- 3. Given that the hydrological flow is generally agreed upon to be NW to SE and as there were several previous major releases at this location, NMOCD requests that at least one of the additional delineation sample locations be located in the SE section within the berms (primary firewall), if feasible. This location would be in the corner of the 500 bbls water tank and the 1000 bbls settling tank.

Please confirm or inform for clarifications.

Thanks, Olivia

From: Jason Wacker <jwacker@bcoperating.com>
Sent: Thursday, June 14, 2018 10:24 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Cc: Bruce Madden <bmadden@bcoperating.com>; Nick Klopp <nklopp@bcoperating.com>
Subject: RE: Government E SWD #1 - Produced Water Spill Summary

Olivia & Shelly,

BC Operating seeks approval of the delineation plan for 1RP-4980 that we discussed previously.

Thanks!

Jason Wacker, P.E. VP of Engineering & Operations

BC Operating, Inc. 4000 N. Big Spring #310 Midland, Texas 79705

PO BOX 50820 Midland, Texas 79710 Office (432) 684-9696 Cell (432) 631-2142

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Tuesday, May 8, 2018 4:14 PM
To: Jason Wacker; Tucker, Shelly
Cc: Bruce Madden; Nick Klopp
Subject: RE: Government E SWD #1 - Produced Water Spill Summary

Mr. Wacker:

NMOCD appreciates the documents provided for the Government E SWD location. However, please be advised that the reports for pit closure are not applicable to releases.

While the conditional closure of 1RP-3681 is acknowledged, current NMOCD guidelines for addressing releases include horizontal and vertical delineation to provide data of the impacted soil remaining in situ for deferral of remediation within facilities.

NMOCD still requires complete release characterization/delineation for 1RP-4890 before any consideration of remedial activities, deferral, or lack thereof.

Thanks, Olivia

From: Jason Wacker <jwacker@bcoperating.com>
Sent: Monday, April 30, 2018 9:53 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; Tucker, Shelly <<u>stucker@blm.gov</u>>
Cc: Bruce Madden <<u>bmadden@bcoperating.com</u>>; Nick Klopp <<u>nklopp@bcoperating.com</u>>
Subject: Government E SWD #1 - Produced Water Spill Summary

Olivia & Shelly,

Please find our summary of the recent Government E SWD #1 produced water spill and background information (including soil sampling), attached.

Thanks!

Jason Wacker, P.E. VP of Engineering & Operations

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