Ms. Groves and Ms. Yu:

We will include the field/pasture in our trench sampling evaluation. If time permits during our one-day field program to characterize both locations (1RP-4624 and 1RP-4625), we will elect to characterize a location near the wellhead.

Expect a discussion on playa hydrogeology and workplan approval requirements shortly.

Andrew Parker
R.T. Hicks Consultants
Durango Field Office
Cell: (970) 570-9535

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**From:** Groves, Amber [mailto:agroves@slo.state.nm.us]
**Sent:** Tuesday, January 2, 2018 5:05 PM
**To:** 'Andrew Parker' <andrew@rthicksconsult.com>; 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
**Cc:** taylorp@pride-energy.com; mattp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>; 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us>
**Subject:** RE: Pride Energy NM 87 State #001 (1RP-4624)

Mr. Parker,

The area of concern is not referenced by your photograph. I have attached a photo showing the area of concern that will need to be sampled to at least 4 feet bgs. The area in your photograph should be sampled as well. Please revise and resubmit with at least three sample points. One in the area of concern in the pasture, one on the pad and one near the source of the wellhead.

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:** Andrew Parker [mailto:andrew@rthicksconsult.com]
**Sent:** Friday, December 29, 2017 12:46 PM
**To:** 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
**Cc:** taylorp@pride-energy.com; mattp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>; Groves, Amber <agroves@slo.state.nm.us>; 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us>
**Subject:** RE: Pride Energy NM 87 State #001 (1RP-4624)

Ms. Yu:

My response is in underlined blue text.

- The proposed delineation sample location is not within the release area near the wellhead. Please provide a rationale and photo documentation if available.

  A phone discussion with Amber Groves (SLO) on December 21$^{st}$ suggested that the area of concern is a salt crust on surface soil southeast of the wellpad.  The below photo shows the area of concern.  Once onsite, we will relocated the proposed trench location to capture the area identified by Ms. Groves.



- Please be advised that a caliche layer is not an acceptable rationale for not completing horizontal or vertical delineation.

  Correct.  If preliminary soil samples indicate that impairment extends beyond the backhoe's

<u>reachable depth, further delineation may be necessary.  Furthermore, additional horizontal characterization may be necessary.</u>

Andrew Parker
R.T. Hicks Consultants
Durango Field Office
970-570-9535

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**From:** Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
**Sent:** Thursday, December 28, 2017 8:28 AM
**To:** Andrew Parker
**Cc:** taylorp@pride-energy.com; mattp@pride-energy.com; Randall Hicks; agroves@slo.state.nm.us;
Billings, Bradford, EMNRD
**Subject:** RE: Pride Energy NM 87 State #001 (1RP-4624)

Mr. Parker:

Please address these concerns regarding the delineation workplan for 1RP-4624:

- The proposed delineation sample location is not within the release area near the wellhead. Please provide a rationale and photo documentation if available.
- Please be advised that a caliche layer is not an acceptable rationale for not completing horizontal or vertical delineation.

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.

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**From:** Andrew Parker [mailto:andrew@rthicksconsult.com]
**Sent:** Wednesday, December 27, 2017 6:09 PM
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
**Cc:** taylorp@pride-energy.com; mattp@pride-energy.com; Randall Hicks <r@rthicksconsult.com>;
agroves@slo.state.nm.us; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
**Subject:** Pride Energy NM 87 State #001 (1RP-4624)

Ms. Yu:

On the behalf of Pride Energy, attached is the characterization plan for NM 87 State #001 (wellhead).  We will perform sampling activities the same day as we characterize the tank battery location (1RP-4625) on Jan 8th, 2017.  We will notify NMOCD/SLO 48-hours prior to performing sampling activities.

Please contact me at 970-570-9535 with any questions.

Andrew Parker
R.T. Hicks Consultants
Durango Field Office
970-570-9535