

From: Graham, Rick
To: [Yolanda Jimenez](#)
Cc: [Yu, Olivia, EMNRD](#); [Griffin, Beau G](#); [Nash, Brett](#)
Subject: RE: [EXTERNAL] RE: Key release
Date: Monday, July 16, 2018 10:17:15 AM

Yolanda,

Yes, we are continuing response actions this week and should have samples collected at the 2ft-bgs. interval, in the impacted area.

Thanks,

Rick Graham | **Key Energy Services** | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yolanda Jimenez [mailto:yjimenez@blm.gov]
Sent: Monday, July 16, 2018 10:48 AM
To: Graham, Rick <rgraham01@keyenergy.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Griffin, Beau G <bgriffin@keyenergy.com>; Nash, Brett <bnash@keyenergy.com>
Subject: Re: [EXTERNAL] RE: Key release

Caution: This email originated from outside of the organization. Do NOT click on links or attachments unless you recognize the sender and know the content is safe.

Hello, Mr. Rick. When I went out there to the SWD on last week, I did not notice any changes. I must assume you all will continue on this week. Thanks.

Regards,

Yolanda

On Wed, Jul 11, 2018 at 1:28 PM Graham, Rick <rgraham01@keyenergy.com> wrote:

Olivia,
Thank you for the response and we will plan to conduct the additional delineation work by next week utilizing the backhoe to achieve 2ft-bgs. depths.

Yolanda,
Please let us know if you have any issue with this scope of work in the next few days? If we don't hear anything back from you, we will proceed as requested.

Thanks,

Rick Graham | **Key Energy Services** | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Wednesday, July 11, 2018 12:19 PM
To: Graham, Rick <rgraham01@keyenergy.com>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Griffin, Beau G <bgriffin@keyenergy.com>; Nash, Brett <bnash@keyenergy.com>
Subject: RE: [EXTERNAL] RE: Key release

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Mr. Graham:

NMOCD would agree to the use of a backhoe to remove the impacted 2 ft. of soil before continuation of vertical and horizontal delineation for 1RP-5071.

Like approval from BLM required.

Thanks,
Olivia

From: Graham, Rick <rgraham01@keyenergy.com>
Sent: Tuesday, July 10, 2018 12:39 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Griffin, Beau G <bgriffin@keyenergy.com>; Nash, Brett <bnash@keyenergy.com>
Subject: RE: [EXTERNAL] RE: Key release

Olivia and Yolanda,

Key plans to use a backhoe to excavate soil sampling locations down to 2ft-bgs., in order to collect additional delineation samples at the Atha facility. Please let us know if you have any issue with the proposed sampling scope?

Thanks,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, June 29, 2018 5:30 PM
To: Graham, Rick <rgraham01@keyenergy.com>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: [EXTERNAL] RE: Key release

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Mr. Graham:

Release characterization still needs to be completed for 1RP-5071. NMOCD recommends the use of a mechanical auger (i.e., direct push soil borer) or a drilling rig to complete vertical delineation due to the release location. However, a backhoe may be able to access the release area.

BLM may have additional right-of-entry requirements.

Thanks,
Olivia

From: Graham, Rick <rgraham01@keyenergy.com>
Sent: Friday, June 29, 2018 1:58 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: [EXTERNAL] RE: Key release

Olivia,

Due to the shallow surface lithology of hard compacted soil at the site, we had refusal for the hand augering method we used at a depth of ~1 ft-bgs. This material was described as concrete like at the 1ft. depth and we were not able to advance the borings any deeper to collect 2ft. samples. We understand this was a deviation from the original sampling plan submitted and would appreciate any input on what the OCD & BLM would suggest next for further delineation sampling.

Thanks,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, June 27, 2018 12:28 PM
To: Graham, Rick <rgraham01@keyenergy.com>; Yolanda Jimenez <yjimenez@blm.gov>

Cc: Griffin, Beau G <bgriffin@keyenergy.com>

Subject: RE: [EXTERNAL] RE: Key release

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Mr. Graham:

What is the rationale for not completing vertical delineation for 1RP-5071? The preliminary data provided indicated all samples at 1 ft. bgs are above permissible chloride limits. The proposed workplan stated that at least 2 ft. of data will be collected.

Thanks,
Olivia

From: Graham, Rick <rgraham01@keyenergy.com>

Sent: Monday, June 25, 2018 10:10 AM

To: Yolanda Jimenez <yjimenez@blm.gov>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Griffin, Beau G <bgriffin@keyenergy.com>

Subject: RE: [EXTERNAL] RE: Key release

Olivia and Yolanda,

Please see the attached lab results, data table and figures for the delineation sampling event conducted at the Atha on 6/14/18. Please let us know your thoughts on the next step in the process and if you have any questions.

Thanks,

Rick Graham | **Key Energy Services** | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yolanda Jimenez [<mailto:yjimenez@blm.gov>]

Sent: Tuesday, June 19, 2018 2:09 PM

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

Cc: Graham, Rick <rgraham01@keyenergy.com>; Griffin, Beau G <bgriffin@keyenergy.com>

Subject: Re: [EXTERNAL] RE: Key release

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Hello, Mr. Rick. When you all get the sample results, please direct them to the BLM as well. Thanks.

Regards,

Yolanda

On Mon, Jun 11, 2018 at 4:31 PM Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Graham:

Thank you for the additional release information regarding 1RP-5071. NMOCD approves of the proposed delineation plan and noted the date and time of sampling activities, occurring on Thursday, June 14, 2018.

Olivia

From: Graham, Rick <rgraham01@keyenergy.com>

Sent: Monday, June 11, 2018 11:23 AM

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

Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>

Subject: RE: Key release

Olivia and Yolanda,

Please see our answers, listed in red below, to your questions in regards to the delineation plan for 1RP-5071. Also, please

find our revised remediation plan/map attached to this email. As requested, the revised remediation plan/map is inclusive of answers to your questions below. We would like this notification to serve as our 48-hour notice to both the NM OCD and the BLM that Key will collect soil samples for analysis this **Thursday, June 14th 2018 beginning at 7 am.**

1. Please indicate the release point on a scaled map. Is the area under the filter pot lined?
 - **Yes, the area under the release point is a lined cement structure. Please see the map provided in the attached remediation plan for the exact point of release.**
2. Is the limit of the release area at the caliche berm? Please verify that the release did not impact the pasture (i.e, photos).
 - **After corresponding with Key operations, we now understand the caliche berm (not part of tank battery secondary containment) had a breach directly to the west of the release point which allowed the released liquids to reach the pasture to the west of the caliche berm. Please refer to the revised remediation plan/map to view the updated affected area and the additional sample locations to reflect these changes. An attached photo of the release area is also attached for reference.**
3. Please be advised that vertical delineation must proceed further than 2 ft. bgs if BTEX, TPH and chloride permissible levels are exceeded. Permissible chloride levels are 600 mg/kg.
 - **Vertical delineation will proceed further than 2 ft. bgs if BTEX, TPH and chloride levels are exceeded at 2 ft. bgs at any sample location.**
4. Soil samples representing the horizontal extent of the release must be collected as well. If the levels of BTEX, TPH, and chlorides exceed permissible levels at the edges of the identified release area, the sample area must be extended laterally, including West of the caliche berm.
 - **Please refer to the revised remediation plan/map to view the updated affected area and the additional sample locations including those extending laterally just outside of the affected area.**
5. Provide GPS coordinates of the sample locations.
 - **Please refer to the revised remediation plan/map for each sample location's GPS coordinates.**
6. Provide NMOCD at least 48-hours advance notice for an opportunity to witness soil sampling processes.
 - **Please let this notification serve as Key's 48-hour notice to both the NM OCD and BLM that Key will collect soil samples for analysis this **Thursday, June 14th beginning at 7 am.****

Please let me know if you have any questions or concerns.

Thanks,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, June 06, 2018 9:40 AM
To: Graham, Rick <rgraham01@keyenergy.com>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

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Good morning Mr. Graham:

Please address these points of concern regarding the proposed delineation plan for 1RP-5071:

1. Please indicate the release point on a scaled map. Is the area under the filter pot lined?
2. Is the limit of the release area at the caliche berm? Please verify that the release did not impact the pasture (i.e, photos).
3. Please be advised that vertical delineation must proceed further than 2 ft. bgs if BTEX, TPH, and chloride permissible levels are exceeded. Permissible chloride levels are 600 mg/kg.
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5. Provide GPS coordinates of the sample locations.
6. Provide NMOCD at least 48 hours advance notice for an opportunity to witness soil sampling processes.

BLM may have additional concerns or stipulations.

Thanks,
Olivia

From: Graham, Rick <rgraham01@keyenergy.com>
Sent: Wednesday, May 30, 2018 8:48 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

Olivia and Yolanda,

Do we have your approval to move forward with the work plan sent last week for investigation/delineation of any impacts at the Atha SWD? Our field team is ready to mobilize to the site and begin the work as soon as we get the go ahead from you both.

Thank you,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Graham, Rick
Sent: Friday, May 25, 2018 9:32 AM
To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

Yolanda and Olivia,

Attached is Key's sampling work plan for the delineation of impacts resulting from the May 10th spill at the Atha SWD. Once we receive approval from your both, we will mobilize to the site for this task. Please let us know if you have any questions.

Thanks,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, May 22, 2018 11:43 AM
To: Graham, Rick <rgraham01@keyenergy.com>
Cc: Yolanda Jordan <yjimenez@blm.gov>
Subject: FW: Key release

Dear Mr. Graham:

Please be advised that NMOCD database indicates Federal surface and mineral ownerships. BLM can verify.

The IRP for this incident is

5071	5/22/2018	A	Key Energy Services	Atha SWD/ JH Day #2	30-025-08816	22S-36E-6D	5/10/2018
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Please remember to include this IRP identifier to all communications. Also, please be advised that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

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: Brown, Maxey G, EMNRD
Sent: Friday, May 11, 2018 10:20 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Key release

Key Atha SWD tank battery. 70 bbls prod. Water on site. Rick Graham 713-651-4437. Event occurred 5/10/2018. Will submit C-141.
30-025-08816.

Sent from Samsung Mobile

--

Yolanda Jordan Jimenez

Environmental Protection Specialist
Bureau of Land Management
Carlsbad Field Office
620 E. Greene Street
Carlsbad, NM 88220
Office: (575) 234-5916
Cell: (575) 361-4586



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--

Yolanda Jordan Jimenez

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From: Graham, Rick
To: [Yu, Olivia, EMNRD](#); [Hernandez, Christina, EMNRD](#)
Cc: [Yolanda Jordan](#); [Griffin, Beau G](#)
Subject: RE: Key release
Date: Friday, June 15, 2018 8:13:59 AM

Olivia,

We did conduct the approved sampling event yesterday at the Atha and used GPS coordinates to mark our sampling locations. We will make sure to use pin flags to mark the locations in the future.

Thanks,

Rick Graham | Key Energy Services | Environmental Director
o: 713.651.4437 | c: 346.274.5432 | e: rgraham01@keyenergy.com

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, June 14, 2018 3:33 PM
To: Graham, Rick <rgraham01@keyenergy.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

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Mr. Graham:

NMOCD visited the release location around 12 pm MST today, June 14, 2018. There does not appear to be markers, such as flags, identifying the sample locations. Please be advised that NMOCD assumes that the sample event proceeded as scheduled despite the presence or absence of NMOCD.

Thanks,
Olivia

From: Yu, Olivia, EMNRD
Sent: Monday, June 11, 2018 4:31 PM
To: 'Graham, Rick' <rgraham01@keyenergy.com>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

Mr. Graham:

Thank you for the additional release information regarding 1RP-5071. NMOCD approves of the proposed delineation plan and noted the date and time of sampling activities, occurring on Thursday, June 14, 2018.

Olivia

From: Graham, Rick <rgraham01@keyenergy.com>
Sent: Monday, June 11, 2018 11:23 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
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Please let me know if you have any questions or concerns.

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To: Graham, Rick <rgraham01@keyenergy.com>
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BLM may have additional concerns or stipulations.

Thanks,
Olivia

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To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

Olivia and Yolanda,

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Rick Graham | Key Energy Services | Environmental Director
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To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
Cc: Yolanda Jordan <yjimenez@blm.gov>; Griffin, Beau G <bgriffin@keyenergy.com>
Subject: RE: Key release

Yolanda and Olivia,

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, May 22, 2018 11:43 AM
To: Graham, Rick <rgraham01@keyenergy.com>
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Dear Mr. Graham:

Please be advised that NMOCD database indicates Federal surface and mineral ownerships. BLM can verify.

The 1RP for this incident is

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Please remember to include this 1RP identifier to all communications. Also, please be advised that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

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: Brown, Maxey G, EMNRD
Sent: Friday, May 11, 2018 10:20 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Key release

Key Atha SWD tank battery. 70 bbls prod. Water on site. Rick Graham 713-651-4437. Event occurred 5/10/2018. Will submit C-141. 30-025-08816.

Sent from Samsung Mobile

From: Jimenez, Yolanda
To: [Jimenez, Yolanda](#); [Griffin, Beau G](#); [Yu, Olivia, EMNRD](#)
Cc: [Graham, Rick](#)
Subject: Re: [EXTERNAL] FW: Key release
Date: Wednesday, June 6, 2018 10:09:48 AM

Good morning, Mr. Rick. I received your sampling plan a few minutes ago. That plan is fine so far. Thanks.

Regards,

Yolanda

On Wed, Jun 6, 2018 at 9:29 AM, Jimenez, Yolanda <yjimenez@blm.gov> wrote:

Good morning, Mr. Rick. I called you on the phone and spoke with you about this issue. I asked you to direct all future issues for NM-131856 to the BLM. You informed me that you understood. Quite obviously you are not understanding, Mr. Rick. I am going to call you once again to discuss this issue with you. I have not seen or heard anything since May 23, 2018. Let us please not continue to have this issue. Thank - you.

Regards,

Yolanda

On Wed, May 23, 2018 at 8:07 AM, Jimenez, Yolanda <yjimenez@blm.gov> wrote:

Good morning once again, Mr. Rick. We just spoke a few minutes ago. As per our conversation, please direct the BLM right of way number for this SWD. Also, we will need additional correspondences directed to the BLM. The NM OCD has already forwarded me the Form 141. Thank - you.

Regards,

Yolanda

On Wed, May 23, 2018 at 7:50 AM, Jimenez, Yolanda <yjimenez@blm.gov> wrote:

Good morning, Mr. Graham. My colleague, Mrs. Shelly directed an email to you regarding contact was needed to the BLM regarding this release. No one has contacted me from Key yet. The BLM Realty Department handles SWD's on Federal lands. I am the Environmental Protection Specialist for the Realty Department, and spills and releases are directed to me. Key may not back fill or remove anything at this time. I need contact from Key Energy immediately. Thanks.

Regards,

Yolanda

On Tue, May 22, 2018 at 10:43 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

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The 1RP for this incident is

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Olivia Yu

Environmental Specialist

NMOCD, District I

Olivia.yu@state.nm.us

575-393-6161 x113

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30-025-08816.

Sent from Samsung Mobile

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Yolanda Jordan Jimenez

Environmental Protection Specialist

Bureau of Land Management

Carlsbad Field Office

620 E. Greene Street

Carlsbad, NM 88220

Office: (575) 234-5916

Cell: (575) 361-4586



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