

From: [Hernandez, Christina, EMNRD](#)
To: "Mann, Ryan": "Andy Rickard"
Cc: [Yu, Olivia, EMNRD](#); [Denise Jones](#); [Kim Merrill](#); [Rob Hendricks](#); [James Corbitt](#); dale@permianws.com
Subject: RE: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)
Date: Tuesday, July 31, 2018 12:59:00 PM
Attachments: [1RP-5139.pdf](#)

Dear Mr. Rickard:

The 1RP for this incident is

5139	7/31/2018	A	Cambrian Mgmt	Kaiser State SWD	30-025-02538	21S-34E-13F	6/20/2018
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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. Please note that NMOCD records indicate spill/release extends to the pasture and lease road and not just the well pad as indicated in the C141.

Please be advised that it is the responsibility of the persons operating/controlling release locations to make sure appropriate parties are notified therefore "auto-forwarding" is left to the operator's discretion. Email notifications may include multiple agencies/division offices within the same email thread (CC line) to facilitate your reporting process as outlined by Mr. Mann. To clarify, NMOCD does not have an electronic portal for uploading therefore all corresponding agencies can be simultaneously notified via email.

Please be aware that the C-141 is available online at :

<http://www.emnrd.state.nm.us/OCD/forms.html>

In general, NMOCD receives C-141 forms in either word or pdf format completed with signature (as previously submitted for release given 1RP-4960 by Ms. Jones).

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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: Mann, Ryan <rmann@slo.state.nm.us>
Sent: Tuesday, July 31, 2018 11:43 AM
To: 'Andy Rickard' <arickard@cambrianmgmt.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Denise Jones <djones@cambrianmgmt.com>; Kim Merrill <kim@etechenv.com>; Rob Hendricks <rhendricks@chambersenergy.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; James Corbitt <james@permianws.com>; dale@permianws.com
Subject: RE: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Mr. Rickard,

Thank you for the update. I can sympathize with the confusion regarding release notification. Please submit a signed C-141 to all relevant agencies, NMSLO and NMOCD in this instance. If it is easier, you may use this email thread. This is the easiest and fastest way to ensure proper notification is given to all relevant parties that I am aware of. I will include all those mentioned in your email in all correspondence to ensure everyone is informed, but until 9/30/2018 I will consider you the lead contact for this issue unless I hear differently from you. Review of the NMOCD website indicate there are now going to be 7 open remediation permits at this site (1RP-3512, 1RP-3621, 1RP-4305, 1RP-4525, 1RP-4855, 1RP-4960, and the most recent release on 6/20). Please inform if you have any

updates on any of these. Reviewing the online documents indicates that some have had delineations, most have not. Perhaps there are documents previously submitted by yourself that haven't made it to the online database. At any rate, delineation is essentially voided after another releases occurs in the same area prior to remediation. All of these should be addressed and resolved at the same time as they most likely overlap to some degree. NMOCD and NMSLO will certainly work with Mr. Merrill or anyone for approval of work plans. Please contact me if you have any other questions or are unclear about any other documentation processes.

Ryan Mann
Remediation Specialist
Field Operation Division
(575) 392-3697
(505) 699-1989
New Mexico State Land Office
2827 N. Dal Paso Suite 117
Hobbs, NM 88240

From: Andy Rickard [<mailto:arickard@Cambrianmgmt.com>]

Sent: Tuesday, July 31, 2018 11:10 AM

To: Mann, Ryan <rmann@slo.state.nm.us>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Denise Jones <djones@Cambrianmgmt.com>; Kim Merrill <kim@etechnv.com>; Rob Hendricks <rhendricks@chambersenergy.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; James Corbitt <james@permianws.com>; dale@permianws.com

Subject: RE: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Mr. Mann,

E-tech environmental has been contracted to handle all remediation of Permian Water Solutions spills. Mr. Kim Merrill will be heading up their efforts (e-mail in CC line). E-tech replaces Trinity Environmental, who did not execute cleanup in an acceptable timeframe. That timeframe, it now appears, may not have been entirely under their control.

Denise Jones handles Cambrian Managements regulatory filings. Our contract to manage field operations for Permian Water Solutions will expire Sept 30, 2018. At that time Mr. James Corbitt and Mr. Dale Gossen will be handling these projects as well as Mr. Rob Hendricks. C-141s for this site include several for the same area of ground, some of which is over liner and some of it is not over liner. Plans to remediate all of the areas of contamination are in place but we cannot move dirt until delineation plans and work plans have been approved. That has been reset. I am encouraging Mr. Merrill to review with Ms. Yu any approved plans regarding the Kaiser facility.

As for your confusion about our process, imagine how we must feel contacting 2 different state offices regarding the same incident and filing the same document type online in some instances and by mail in others. With e-mail these can be autoforwarded to you internally.

Thank you for your patience as we attempt to navigate the process.

Andrew E Rickard
Project Manager



415 West Wall St., Suite 900
Midland, TX 79701
Off: 432-620-9181
Cell: 432-553-2828

From: Mann, Ryan <rmann@slo.state.nm.us>

Sent: Monday, July 30, 2018 4:19 PM

To: Andy Rickard <arickard@Cambrianmgmt.com>

Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Denise Jones <djones@Cambrianmgmt.com>; Kim Merrill <kim@etechnv.com>; Rob Hendricks <rhendricks@chambersenergy.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Subject: Re: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Mr. Richard,

NMSLO appreciates your willingness to comply. As such, can you provide and information to the remediation work conducted? Additionally, during a site visit today it was noted that the tank battery is very contaminated and appeared only partially lined. This area should be remediated as well and any others that result from operation of the facility. Can you please inform on this as well. Also I'm a bit confused regarding Cambrians internal document tracking process. Can you submit via email a signed C-141? NMSLO needs to be informed of all releases on state lands, emailing and including all relevant parties is the easiest course, I feel. Please get in contact if you have any questions.

Thanks
Ryan

Sent from my iPhone

On Jul 30, 2018, at 2:48 PM, Andy Rickard <arickard@Cambrianmgmt.com> wrote:

Olivia,

When creating original documents, we save to the server unsigned copies, we signed in alternative color ink to demonstrate original signature and you, no doubt have received via USPS the signed original and we usually send copy/working copy with the original. If that was not the case I will review standard procedures in house. Denise does not usually make errors. The copy I sent you was direct from the server and is not signed. C-141 does not show to be an online available form according to the website. A copy of the original signed c141 was filed in the paper file as well, and I find it unlikely she would have gone to the trouble of making a copy for the paper file without the form being submitted. I am disappointed that this has risen as an issue when she made every attempt to comply.

Andrew E Rickard

Project Manager

<image001.jpg>

415 West Wall St., Suite 900

Midland, TX 79701

Off: 432-620-9181

Cell: 432-553-2828

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

Sent: Monday, July 30, 2018 3:22 PM

To: Andy Rickard <arickard@Cambrianmgmt.com>; Denise Jones <djones@Cambrianmgmt.com>; Kim Merrill <kim@etechnv.com>; Rob Hendricks <rhendricks@chambersenergy.com>

Cc: Mann, Ryan <rmann@slo.state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Subject: RE: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Mr. Rickard:

To avoid this type of situation, if electronic submission is not preferred, please send by certified USPS mail, USPS, or Fedex. All provide tracking numbers and documented date/time of receipt. Also, please be advised that all C-141 forms should be signed for certification of the indicated information.

Thanks,
Olivia

From: Andy Rickard <arickard@Cambrianmgmt.com>

Sent: Monday, July 30, 2018 1:41 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Denise Jones <djones@Cambrianmgmt.com>; Kim Merrill <kim@etechnv.com>; Rob Hendricks <rhendricks@chambersenergy.com>

Cc: Mann, Ryan <rmann@slo.state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>

Subject: RE: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Olivia,

Attached is a copy of the C-141 that was filled out June 21, 2018 and made the mail on the 22nd. We assessed by sending a superintendent to location and his report was used to fill out the C-141 within 24 hours. Attempts were made to call prior to mailing. We have made every attempt to comply.

Andrew E Rickard

Project Manager

<image001.jpg>
415 West Wall St., Suite 900
Midland, TX 79701
Off: 432-620-9181
Cell: 432-553-2828

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Monday, July 30, 2018 12:11 PM
To: Andy Rickard <arickard@CambrianMgmt.com>
Cc: Mann, Ryan <rmann@slo.state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Subject: Probable major release at Cambrian Kaiser State SWD #9 (30-025-02538)

Dear Mr. Rickard:

NMOCD was informed this morning of a probable major release that occurred on June 20, 2018 at the Kaiser State SWD #9 (30-025-02538). Per NMAC 19.15.29, the Responsible Operator must verbally inform NMOCD within 24 hours of a major (25 bbls and greater) release. The written notification, on an initial C-141 form, was due on July 4, 2018. NMOCD expects the C-141 form (major or minor) to be electronically submitted.

Please be advised that the Responsible Operator is currently not in compliance with NMAC 19.15.29. Email the initial C-141 by end of business today, July 30, 2018 to NMOCD and NMSLO.

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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