

From: [Yu, Olivia, EMNRD](#)
To: ["Baker, Larry"; Mann, Ryan](#)
Cc: [Hernandez, Christina, EMNRD](#)
Subject: RE: Shell GA State # 2 illegal dumping of produced water
Date: Tuesday, September 25, 2018 1:34:00 PM
Attachments: 1RP5203_initialC-141.pdf

Mr. Baker:

As you already mentioned during the initial notification call on September 19, 2018, the release occurred in an area with shallow groundwater. Please address this release as high priority.

Please be advised that

1. Dated, geo-referenced photo documentation for verification that the initial response activities have been employed to contain the release are necessary.
2. Per 19.15.29.13 NMAC, regulations of corresponding agencies supersede NMOCD's.

The 1RP for this incident is

5203	9/25/2018	A	Apache	Shell GA State #2	30-025-06131	20S-37E-16M	9/17/2018
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Please remember to include this 1RP identifier to all communications. Revised NMAC 19.15.29 was effective on August 14, 2018. Delineate and remediate per regulation. Mind the timelines for submittal of requisite information.

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

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: Baker, Larry <Larry.Baker@apachecorp.com>
Sent: Tuesday, September 25, 2018 11:30 AM
To: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Subject: [EXT] FW: Shell GA State # 2 illegal dumping of produced water

All,

Attached is the initial C-141 for the release at the Shell GA State # 2. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

BRUCE BAKER

ENVIRONMENTAL TECHNICIAN SR

direct 575-393-7106 ext 1523 | Cell 432-631-6982

APACHE CORPORATION

2350 W. MARLAND BLVD
HOBBS, NM 88240

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From: Baker, Larry
Sent: Thursday, September 20, 2018 5:13 PM
To: 'Griswold, Jim, EMNRD' <Jim.Griswold@state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Shell GA State # 2 illegal dumping of produced water

Mr. Griswold,

My intent was not to mislead you on whom the responsible party (Apache Corporation) but did what to emphasis that the event was illegal activity caused by an unaffiliated party. Apache Corporation will comply with 19.15.29 NMAC. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

BRUCE BAKER

ENVIRONMENTAL TECHNICIAN SR

direct 575-393-7106 ext 1523 | Cell 432-631-6982

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HOBBS, NM 88240

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From: Griswold, Jim, EMNRD [<mailto:Jim.Griswold@state.nm.us>]
Sent: Thursday, September 20, 2018 4:45 PM
To: Baker, Larry <Larry.Baker@apachecorp.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: [EXTERNAL] RE: Shell GA State # 2 illegal dumping of produced water

Bruce,

OCD rules state the responsible party is the operator meaning the person who manages a lease's development. It does not mean "an unaffiliated third party". Please comply with provisions of 19.15.29 NMAC.

Jim Griswold

Environmental Bureau Chief

Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505.476.3465

email: jim.griswold@state.nm.us

From: Baker, Larry <Larry.Baker@apachecorp.com>
Sent: Wednesday, September 19, 2018 3:47 PM
To: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Shell GA State # 2 illegal dumping of produced water

All,

Apache Corporation has discovered that an unaffiliated third party truck has illegally unloaded an unknown volume of what appears to be produced water off the plug and abandoned well Shell GA State #002 (API 30-025-06131). GPS 32.5667572 -103.2639694 UL M Section 16 20S 37E. Thanks and have a good day.

BRUCE BAKER

ENVIRONMENTAL TECHNICIAN SR

direct 575-393-7106 ext 1523 | Cell 432-631-6982

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HOBBS, NM 88240

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