

From: [Mann, Ryan](#)
To: [Yu, Olivia, EMNRD](#); [Andrew Parker](#)
Cc: [Billings, Bradford, EMNRD](#); [Naranjo, Mark](#); mattp@pride-energy.com; taylorp@pride-energy.com; 'Randall Hicks'
Subject: [EXT] RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624
Date: Thursday, October 4, 2018 11:14:45 AM

Mr. Parker and Pride,

NMSLO does not approve of the work plan as written. As evidence in the provided photos there are areas off the well pad that have a noticeable difference in vegetation from the surrounding pasture area. Even though these areas may be below RRALs according to Table 1 of the new rule 19.15.29.12, these areas will still require attention.

19.2.100.66 (4)(a) states: All new spill shall be treated and cleaned up immediately. All surface affected by such spills and leaks shall be reclaimed. Reclamation of the area involved shall be implemented in consultation with the state land office.

This was not the case in this situation. NMSLO requires that all areas around the well that display no or limited vegetation growth be reclaimed to their condition prior to the historic release. This is also pursuant to 19.15.29.13 E. *The surface restoration, reclamation, and revegetation obligation imposed by federal or state agencies or tribes on lands managed or owned by those agencies supersede these provision...*

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: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Thursday, October 4, 2018 7:21 AM
To: Andrew Parker <andrew@rthicksconsult.com>; Mann, Ryan <rmann@slo.state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>; mattp@pride-energy.com; taylorp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Messrs. Parker & Pride:

While an actual 'approved work plan' was not explicitly stated, please note that the year-long back and forth correspondence is to ensure that complete release characterization is conducted before an appropriate remediation plan is in place to resolve 1RP-4624.

Please be advised that NMOCD applies 19.15.29 NMAC in its entirety. Therefore, please note that 19.15.29.12C(2) states

(2) The responsible party shall restore the impacted surface area of a release occurring on a developed well pad, central tank battery, drilling site, compressor site or other exploration, development, production or storage sites to meet the standards of Table I of 19.15.29.12 NMAC or other applicable remediation standards **and restore and reclaim the area pursuant to 19.15.29.13 NMAC.**

Which includes this section:

19.15.29.13A: **A.** The responsible party must substantially restore the impacted surface areas to the condition that existed prior to the release

AND

19.15.29.13E

E. The surface restoration, reclamation and re-vegetation obligations imposed by federal or state agencies or tribes on lands managed or owned by those agencies supersede these provisions and govern the obligations of any responsible party subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.

NMOCD Hobbs will defer to NMOCD Santa Fe to determine whether pre- or post- August 12, 2018 remediation levels are applicable for this UNKNOWN release volume, in which case, 19.15.29.11.5(c).

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: Andrew Parker <andrew@rthicksconsult.com>
Sent: Thursday, August 30, 2018 5:04 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Mann, Ryan' <rmann@slo.state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; 'Randall Hicks' <r@rthicksconsult.com>

Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Attached is the remediation plan for the above referenced [wellhead](#) site. Please note I will be out of the office from Aug. 31st through September 15th.

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

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, July 26, 2018 9:35 AM
To: Andrew Parker; Mann, Ryan
Cc: Billings, Bradford, EMNRD; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; Randall Hicks
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Good morning Mr. Parker:

The request for deferral for proposed remediation is denied for 1RP-4624. The historic and most recent release on this location abide by current regulation. Vertical delineation on the well pad- North and Southeast locations- must be completed before evaluation of proposed remediation.

NMSLO may have additional concerns and stipulations.

Thanks,
Olivia

From: Andrew Parker <andrew@rthicksconsult.com>
Sent: Tuesday, June 26, 2018 5:28 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com; Randall Hicks <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Attached is the characterization and remediation plan for Pride Energy's NM 87 State 001 ([Wellhead](#)) release. Please note that we ask NMOCD for a temporary deferment to the proposed restoration and remediation plan. The purpose of the request is to postpone remediation/restoration design until the final ruling of NMOCD's proposed application to repeal and replace Rule 19.15.29 NMAC (the Rule). The final ruling is expected to be delivered by the first week of August 2018.

Thank you,

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

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:51 PM
To: Olivia.yu@state.nm.us
Cc: bradford.billings@state.nm.us; mnanranjo@slo.state.nm.us; mattp@pride-energy.com; taylorp@pride-energy.com
Subject: RE: Pride Energy NM 87 State 001 (Wellhead) 1RP-4624

Ms. Yu:

Please consider this the 48-hour advanced notice to perform characterization as outlined in our March 28, 2018 report submitted to Pride Energy with a copy to NMOCD. [We plan to arrive at the wellhead location late afternoon on April 2, 2018](#), after completion of characterization at the tank battery location. We welcome NMOCD to observe the characterization and we are prepared to answer any questions NMOCD may have. Any person on-site will be required to have steel toe boots, ear protection, and hardhat as PPE.

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

From: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Wednesday, March 28, 2018 3:29 PM
To: mattp@pride-energy.com; taylorp@pride-energy.com
Cc: bradford.billings@state.nm.us; mnanranjo@slo.state.nm.us; Olivia.yu@state.nm.us
Subject: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Mr. Pride:

Attached are the results of the first characterization plan and the proposed activities for the second characterization. Please note that NMAC 19.15.29 does not require NMOCD approval of characterization plans. After reviewing second characterization results, we will determine the best approach on whether to

1. Perform corrective actions under the current regulation, or
2. Ask for a variance using the proposed cleanup criteria levels as a guidance as discussed in the attached plan.

We plan on performing the second characterization on the afternoon of April 2, 2018. A notice to NMOCD will follow this email.

Per NMAC 19.15.29, the next formal submission to NMOCD is either a remediation (correction action) or closure plan – at which time NMOCD can either deny or approve the plan. The type of submission and path forward will be based on data collected during the characterization using standards and regulations in-place at the time. A formal variance may be requested at the time of formal submission to NMOCD.

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

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