

From: [Yu, Olivia, EMNRD](mailto:Yu.Olivia@EMNRD)
To: "Andrew Parker" <andrew@rthicksconsult.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: [Billings, Bradford, EMNRD](mailto:Billings,Bradford.EMNRD); [Naranjo, Mark](mailto:Naranjo,Mark) <matt@pride-energy.com>; taylor@pride-energy.com; "Randall Hicks"
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625
Date: Sunday, October 7, 2018 11:16:00 AM

Messrs. Parker/Pride:

Relevant comments stated for 1RP-4624 are applicable to 1RP-4625. NMOCD will not grant deferral for remediation until release characterization/delineation is completed for 1RP-4625. Delineation for TPH extended are still required for the area represented by NW berm. If the tank battery is situated on top of a drilling pit, please provide documentation for verification.

Thanks,
Olivia

From: Mann, Ryan <r-mann@sls.state.nm.us>
Sent: Thursday, October 4, 2018 1:27 PM
To: "Andrew Parker" <andrew@rthicksconsult.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Naranjo, Mark <MNaranjo@sls.state.nm.us>; matt@pride-energy.com; taylor@pride-energy.com; "Randall Hicks" <r@rthicksconsult.com>
Subject: [EXT] RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

NMSLO has the same concerns as 1RP-4624. Any impacted areas need to be reclaimed to their prior condition (i.e. pasture), regardless of the results of the soil samples. This includes the historic portions. The exception is the playa. Any further remediation may be counterproductive to the functionality of the playa.

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: Andrew Parker [<mailto:andrew@rthicksconsult.com>]
Sent: Thursday, August 30, 2018 5:05 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Mann, Ryan <r-mann@sls.state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Naranjo, Mark <MNaranjo@sls.state.nm.us>; matt@pride-energy.com; taylor@pride-energy.com; "Randall Hicks" <r@rthicksconsult.com>
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Ms. Yu:

Attached is the remediation plan for the above referenced [tank battery](#) 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: Friday, July 20, 2018 10:04 AM
To: Andrew Parker; Mann, Ryan
Cc: Billings, Bradford, EMNRD; naranjo@sls.state.nm.us; matt@pride-energy.com; taylor@pride-energy.com; Randall Hicks
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Good morning Mr. Parker:

Postponement of remediation for the release assigned 1RP-4625 is DENIED. This release occurred in early-mid January 2017 with months of unnecessary delay in addressing the impacted area, especially unjustified as the release occurred adjacent to a playa, which is a waterbody of New Mexico.

The release area around the tank battery, represented by NW berm data, and well pad, represented by TT-1 July 2017 data, will need additional vertical delineation.

NMSLO may have additional concerns.

Thanks,
Olivia

From: Andrew Parker
Sent: Tuesday, June 26, 2018 5:21 PM
To: Yu, Olivia, EMNRD
Cc: Billings, Bradford, EMNRD ; naranjo@sls.state.nm.us; matt@pride-energy.com; taylor@pride-energy.com; Randall Hicks
Subject: RE: Pride Energy NM 87 State 001 (Tank Battery) 1RP-4625

Ms. Yu:

Attached is the characterization and remediation plan for Pride Energy's NM 87 State 001 ([Tank Battery](#)) 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; naranjo@sls.state.nm.us; matt@pride-energy.com; taylor@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: matt@pride-energy.com; taylor@pride-energy.com
Cc: Bradford.Billings@state.nm.us; naranjo@sls.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 approval 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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