From:	Rebecca Haskell
To:	Yu, Olivia, EMNRD; aaarias@blm.gov; Dakota Neel
Cc:	Oberding, Tomas, EMNRD; Tavarez, Ike; Robert McNeill
Subject:	RE: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM 1RP-4492
Date:	Monday, May 1, 2017 3:35:52 PM

Ms. Yu,

COG currently does not a have a policy regarding delineation and considers each site on a case by case basis. COG is currently evaluating the newest delineation requests by the NMOCD. This spill was addressed immediately after the release by operations and when sampling was conducted by our contractor, no impact was found. In this case, no constituents of concern were found over the permissible levels for Benzene, BTEX, TPH or chloride. There isn't any scientific evidence that should require delineation to 10 feet. Also, please clarify your last question regarding the 4 foot sample.

Thank You,

Becky Haskell Senior HSE Coordinator COG Operating LLC 600 W Illinois Avenue | Midland, TX 79701 Direct: 432-818-2372 | Main: 432.683.7443 Cell: 432-556-5130 rhaskell@concho.com



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From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Wednesday, April 19, 2017 5:23 PM
To: Rebecca Haskell; aaarias@blm.gov; Dakota Neel
Cc: Oberding, Tomas, EMNRD; Tavarez, Ike; Robert McNeill
Subject: RE: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM 1RP-4492

Dear Ms. Haskell:

Please address these questions. Just to be clear, COG's current policy is not to conduct additional delineation for releases that occur on location (well pad, tank battery)? For example, with depth to GW < 50 ft. for this well pad, COG requests closure of 1RP-4492 without providing the 10 ft. below permissible levels for Benzene, BTEX, TPH, and chlorides, correct? Also, bottom confirmation samples at 4 ft. for these constituents were not analyzed?

Thank you for your attention.

Olivia

From: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Wednesday, April 5, 2017 2:56 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; aaarias@blm.gov; Dakota Neel
<<u>DNeel2@concho.com</u>>
Cc: Oberding, Tomas, EMNRD <<u>Tomas.Oberding@state.nm.us</u>>; Tavarez, Ike
<<u>Ike.Tavarez@tetratech.com</u>>; Robert McNeill <<u>RMcNeill@concho.com</u>>
Subject: RE: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM 1RP-4492

Ms. Yu,

As per our conversation yesterday, April 4, 2017, when COG has a release on a well pad or tank battery operations will take immediate actions to address the release. Operations will go remove impacted soil before HSE has the site sampled, in some cases they are successful in the removal of all impacted soil. In the case of the spill release site referenced above, analytical results demonstrate that initial response actions taken by our operations group were sufficient in the remediation of this release. COG is respectfully requesting review of the attached closure report (originally submitted January 26, 2017) and closure approval from the NMOCD. Also attached for your records, BLM Closure Approval. Please let me know if you have any additional questions.

Thank You,

Becky Haskell Senior HSE Coordinator COG Operating LLC 600 W Illinois Avenue | Midland, TX 79701 Direct: 432-818-2372 | Main: 432.683.7443 Cell: 432-556-5130 rhaskell@concho.com



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Subject: RE: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM

Dear Ms. Haskell:

I have reviewed the closure report for 1RP-4492. Given the volume of release that was not recovered (approximately 25 bbls), presumably on the well pad outside of the lined facility, the low values for BTEX, TPH, and Chlorides are unusual. NMOCD requests that a minimum of 4 confirmation samples are taken from 60 ft x 100 ft release area. Please address these concerns.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 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: Rebecca Haskell [mailto:RHaskell@concho.com]
Sent: Thursday, February 9, 2017 8:14 AM
To: Lynch, Kristen, EMNRD <<u>Kristen.Lynch@state.nm.us</u>>; Yu, Olivia, EMNRD
<<u>Olivia.Yu@state.nm.us</u>>
Cc: Oberding, Tomas, EMNRD <<u>Tomas.Oberding@state.nm.us</u>>
Subject: FW: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM

Ms. Lynch/Ms. Yu,

I am checking on the status of the Closure request for this site submitted January 23, 2017. Please see below BLM approval for closure. If you have any additional questions please feel free to contact me.

Thank You,

Becky Haskell Senior HSE Coordinator COG Operating LLC 600 W Illinois Avenue | Midland, TX 79701 Direct: 432-818-2372 | Main: 432.683.7443 Cell: 432-556-5130 rhaskell@concho.com



From: Arias, Arthur [mailto:aaarias@blm.gov]
Sent: Monday, February 06, 2017 3:40 PM
To: Rebecca Haskell
Subject: [External] Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM

**** External email. Use caution. **** The closure report for the Blue Jay Fed #001H has been accepted for closure by the BLM. Thank You.

Arthur Arias <u>aaarias@blm.gov</u> Environmental Protection Specialist Bureau Of Land Management,Carlsbad Field Office 575-234-6230 Cell 575-499-3378

------ Forwarded message ------From: **Tucker, Shelly** <<u>stucker@blm.gov</u>> Date: Wed, Jan 25, 2017 at 3:31 PM Subject: Fwd: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM To: "Arias, Arthur" <<u>aaarias@blm.gov</u>>

------ Forwarded message ------From: Tavarez, Ike <Ike.Tavarez@tetratech.com> Date: Mon, Jan 23, 2017 at 12:57 PM Subject: COG Operating - Closure Report - Blue Jay Federal #001H, Lea County , NM To: "Lynch, Kristen, EMNRD" <<u>Kristen.Lynch@state.nm.us</u>>, "Tucker, Shelly (stucker@blm.gov)" <<u>stucker@blm.gov</u>> Cc: Robert McNeill <<u>RMcNeill@concho.com</u>>, Rebecca Haskell <<u>RHaskell@concho.com</u>>, Robert Grubbs <<u>RGrubbs@concho.com</u>>, Dakota Neel <<u>DNeel2@concho.com</u>>, "Gonzales, Clair" <<u>Clair.Gonzales@tetratech.com</u>>

Kristen and Shelly,

Please find the enclosed Closure Report for the above reference spill site located in Lea County, New Mexico. The closure report details the sampling activities and results of the investigation. Please let me know if you need additional information or call me if you have any questions, thanks

Ike Tavarez, PG | Senior Project Manager Main: 432.682.4559 | Fax: 432.682.3946 | Cell: 432.425.3878 Ike.Tavarez@tetratech.com<mailto:Ike.Tavarez@tetratech.com> Tetra Tech | Complex World, Clear Solutions(tm) 4000 North Big Spring, Suite 401 | Midland, TX 79705 | www.tetratech.com<<u>http://www.tetratech.com</u>>

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