

From: [Yu, Olivia, EMNRD](#)
To: ["Jennifer Knowlton"](#); [Mann, Ryan](#); [Hernandez, Christina, EMNRD](#)
Cc: [itavarez@concho.com](#); [rhaskell@concho.com](#); [Dakota Neel](#); [Sheldon Hitchcock](#); [DeAnn Grant](#)
Subject: RE: Stratojet 31State Com 007H DOR 8/4/2018 1RP-5146
Date: Tuesday, November 6, 2018 9:00:00 AM
Attachments: USGS_1mile.pdf

Good morning Ms. Knowlton/Haskell:

Please be advised that while the Responsible Operator may have met NMOCD requirements as per 19.15.29 NMAC, NMOCD is not a land agency. NMSLO's conditions of approval are concurrent with NMOCD's. One agency's regulations do not dominate another. In fact, per 19.15.29.13E, NMSLO's restoration, reclamation, and revegetation requirements supersede NMOCD. NMOCD requirements pertain to remediation.

Also, please note that

1. The Responsible Operator must sign the C-141 form, not an agent.
2. There are two USGS wells within a 1 mile radius, indicating depth to groundwater between 51 and 100 ft. bgs. Release characterization for TPH extended and GRO & MRO fraction is not complete.
3. According to the Sample Location Map, Sample location 2 seems to be approximately 50 ft. NW from the wellhead, which may not be considered "immediately around production equipment..."
4. NMOCD is in concurrence with NMSLO with additional delineation necessary at Sample locations 2 & 5 for 1RP-5146.

Olivia

From: Jennifer Knowlton <jknowlton@hrlcomp.com>
Sent: Monday, November 5, 2018 1:20 PM
To: Mann, Ryan <rmann@slo.state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Cc: itavarez@concho.com; rhaskell@concho.com; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>
Subject: [EXT] RE: Stratojet 31State Com 007H DOR 8/4/2018 1RP-5146

Mr. Mann,

The remediation activities occurred on pad as the spill did not impact any off pad. Delineation to NMAC 19.15.29 Table 1 standards is required in NMAC 19.15.29.A(5)(b). Electric lines and equipment proximity prevented further depths being safely reached.

As stated in the remediation plan, Concho is requesting a deferment of some areas of soil removal. Per 19.15.29.12.C(2), if the contamination is in areas immediately under or around production equipment such as production tanks, wellheads and pipelines were remediation could cause a major facility deconstruction, the remediation may be deferred with approval until the equipment is

removed. The area of contamination is around the wellhead with known electric lines running through the contamination area. Concho will remove what contamination can be safely removed and leave some in place. This includes the areas around SP2 (proximity to electric lines) and SP5 (proximity to wellhead equipment).

Jennifer Knowlton, PE | Regional Manager-Permian

HRL Compliance Solutions, Inc.

112 S. 6th Street | Artesia, NM 88210

main 575.616.7398 Ex. 414 | mobile 505-238-3588

[Web](#) | [vCard](#) | [Map](#) | [□](#) | [□](#)

Confidentiality Note: This email and any attachments are confidential and only for the use as authorized by HRL Compliance Solutions, Inc. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information. Permanently delete the e-mail and any attachments or copies.

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

Sent: Monday, November 05, 2018 10:21 AM

To: Jennifer Knowlton <jknowlton@hrlcomp.com>; 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; 'Hernandez, Christina, EMNRD' <Christina.Hernandez@state.nm.us>

Cc: itavarez@concho.com; rhaskell@concho.com; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>

Subject: RE: Stratojet 31State Com 007H DOR 8/4/2018 1RP-5146

Ms. Knowlton,

Delineation isn't completed at the site, therefore deferral is denied. Is the refusal the reason for incomplete delineation? The remediation plan is also denied, the area around SP-2 and SP-5 will require additional investigation to characterize. What is the area that is proposed for deferred? NMOCD may have additional questions or concerns. Let me know if you have any questions.

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: Jennifer Knowlton [<mailto:jknowlton@hrlcomp.com>]

Sent: Friday, October 26, 2018 2:04 PM

To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>;

'Hernandez, Christina, EMNRD' <Christina.Hernandez@state.nm.us>

Cc: itavarez@concho.com; rhaskell@concho.com; Dakota Neel <DNeel2@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; DeAnn Grant <agrant@concho.com>

Subject: Stratojet 31State Com 007H DOR 8/4/2018 1RP-5146

Ms. Yu/Mr. Mann,

On behalf of COG Operating, I am submitting a remediation plan for the Stratojet 31 State Com 007H. If you have any questions, please feel free to contact me.

Thanks,

Jennifer Knowlton, PE | Regional Manager-Permian

HRL Compliance Solutions, Inc.

112 S. 6th Street | Artesia, NM 88210

main 575.616.7398 Ex. 414 | mobile 505-238-3588

[Web](#) | [vCard](#) | [Map](#) |  | 

Confidentiality Note: This email and any attachments are confidential and only for the use as authorized by HRL Compliance Solutions, Inc. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information. Permanently delete the e-mail and any attachments or copies.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>
