

Bratcher, Mike, EMNRD

From: Robert McNeill <RMcNeill@concho.com>
Sent: Friday, April 08, 2016 9:46 AM
To: Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; Strang, Dana V.; Barnes, Will (wbarnes@slo.state.nm.us); Groves, Amber; Kasuboski, Robert (rkasuboski@slo.state.nm.us)
Cc: Robert Grubbs; Pat Ellis; Timothy Reed
Subject: RE: Crossman 25 State Com. #1

To SLO and OCD personnel:

This is to notify you that the temporary well (TW—1) at the Crossman 25 State Com. #1 is scheduled to be plugged on Tuesday, April 12, 2016 by our contractor, Struab Corp. They are planning to start at 9:00 AM NM time. You are invited to witness the plugging activities. If you have any questions, please contact me.

Robert McNeill, P. E.
Environmental Manager
COG Operating LLC

One Concho Center
600 West Illinois Avenue
Midland, TX 79701
Office 432.221.0388
Cell 432.638.6470

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From: Billings, Bradford, EMNRD [mailto:Bradford.Billings@state.nm.us]
Sent: Friday, April 01, 2016 2:33 PM
To: Robert McNeill; Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD; Strang, Dana V.; Barnes, Will (wbarnes@slo.state.nm.us); Groves, Amber; Kasuboski, Robert (rkasuboski@slo.state.nm.us)
Cc: Robert Grubbs; Pat Ellis; Timothy Reed
Subject: [External] RE: Crossman 25 State Com. #1

**** External email. Use caution. ****

Robert,

Having reviewed the most recent data submittal, and following conversations with both OCD staff and Mr. Barnes with the SLO, the following:

The temporary well identified as TW-1 may be plugged and abandoned as per protocol.

The water quality as presented by sampling of the TW-1 well and the nearby up gradient seeps are within historical ranges of reported background values and as such, OCD believes that whatever impact to the groundwater relative to your activities on this location, they cannot be discriminated out of background values. OCD has discussed this with Mr. Barnes of the SLO, and as represented by his recent letter on this matter this specific question has been answered.

Also, as represented in this same letter by Mr. Barnes he has stated, and OCD is in agreement with the SLO, that soils distinctly contaminated by chloride shall not be used in the rebuild plans for the pad aspect of this site. This would entail specific removal from site of some soils already identified in the area of TW-1, in the area of T-2 to 2 feet, in the area of T3 to two feet and in the area of T5 to the ten (10) foot interval. Additionally, the OCD requires that soils intended to be reused for the rebuild be defined as to having chloride values no higher than 800 mg/Kg chloride. OCD believes that there is an opportunity to mitigate some of the surface/soils contamination about the site during the needed site rebuild. We believe it best to approach this as having an opportunity to improve the conditions at this location, to remove what can be removed, to minimize potential of adding to the current ground water chloride levels identified at the location.

The specifics of the methodology/technique to define which soils may be used and which may not be used can be defined with the District II staff before submittal by COG of a work plan for this endeavor. This would include identification of where removed soils would be taken.

OCD would like to thank COG and the SLO for all efforts on behalf of this long enduring and sometimes complicated circumstance. If there are questions or comments please do not hesitate to contact the OCD.

Sincerely,
Brad Billings
Hydrologist
NMOCD-Santa Fe Office for District II (Artesia)

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