

Brad Billings States

RE: 2RP-3893

At this time, your proposal, dated January 2, 2017 is **not** approved. OCD requests that a investigation/monitor well be installed as close to the point of release as practicable. Based on your "Figure 1" in the proposal, this will be in the approximate location identified as "S-1 -10' ". Well screenings are to be set at 5ft above water surface and 10 ft below water surface. A survey of the top of the well casing is to be within 1/100 of an inch. OCD also requests that during drilling operations, soil samples be obtained at 5' intervals and tested for BTEX, TPH and Chloride. Once the well is completed, water samples are to be obtained for analyses, utilizing standard, acceptable sampling methods and protocol. Once this data has been obtained, OCD will evaluate, and consider a soil remediation proposal, and if necessary, a water abatement plan. Please advise once the boring activity has been scheduled.

#### Randall Hicks Responds

Thanks for the phone call – it created clarity. Lime Rock will

1. Drill through the existing open boring for the installation of the monitoring well
2. Collect soil samples at 5-foot increments from the TD of the open boring to the water table We will send soil samples to the laboratory for analysis of BTEX, TPH and chloride.
3. Drill 17 feet below "first water" and allow the open boring to stand for at least 30 minutes. We will measure the depth to water every 5-10 minutes and when the water level is stable, we will call it "depth to water".
4. Install a 2-inch PVC well with 10-feet of screen below the water level observed in the boring after allowing stabilization of the water levels. The well will be installed per NMED Guidance – but with 5 feet of screen above the water table and 10 feet below. We may install a 2-foot sump or fill the boring as necessary with sand to accurately place the screen.
5. The well will be developed after drilling by bailing. Purged water will be stored for disposal – probably in a few drums. If fresh water is introduced by drilling,
6. At some time in the very near future, when a professional surveyor is nearby, the top of casing will be determined with a nearby oil well as the elevation benchmark. We believe we can meet the 1/100 inch criteria using the nearby oil well as a benchmark.
7. The well will be sampled 7-10 days after drilling is complete following EPA protocols by bailing at least 3 casing volumes of water prior to sampling. We will ask the laboratory to evaluate the samples for
  - a. BTEX
  - b. TDS
  - c. Chloride
  - d. Sulfate

8. If sampling of the well documents to the satisfaction of OCD that groundwater is NOT impaired above NM Standards, Lime Rock will

a. petition OCD to allow plugging and abandonment of the well and

b. Understand that the regulatory file associated with groundwater is closed

As discussed, we will address the need to implement any soil remedy after we look at the data from the monitoring well.