

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, August 10, 2017 2:39 PM  
**To:** 'Chuck Johnston'; Daniel Dominguez; Weaver, Crystal, EMNRD; brandon boone  
**Subject:** RE: Horse Creek Com #2 Work Plan 2RP-4071

RE: 2RP-4071

Chuck,

Thanks for the email and the phone call to answer my questions. At this time, the proposal for remediation of the above referenced is approved. Please advise once remedial activities have been scheduled.

Thanks,

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210  
575-748-1283 Ext 108

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.

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**From:** Chuck Johnston [mailto:cjohnston@vnreenergy.com]  
**Sent:** Thursday, August 10, 2017 9:32 AM  
**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Daniel Dominguez <ddominguezepi@gmail.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; brandon boone <bboone.epi@gmail.com>  
**Subject:** RE: Horse Creek Com #2 Work Plan 2RP-4071

Good morning Mike, I will try and explain a little better. The foreman originally used a contractor to excavate the stained area around the wellhead. He would dig out a portion and haul to the landfill based off of his sampling. We decided to bring in EPI to verify vertical and horizontal sampling and prepare the work plan. EPI found the area to be low on chlorides with the exception of a couple of spots about 2 feet down on the side walls. After checking horizontally, EPI determined an extra foot around the excavated area 3 foot deep would be sufficient. The excavation from the previous contractor was estimated at 7ft deep around the wellhead so EPI was recommending placing the liner at the bottom of excavated area at the same time they place it at the 3 foot level as an extra precaution.

Brandon or Daniel, if this is not correct or if you need to add anything please do.

I have attached the disposal tickets associated with the Horsecreek and will give you a call later to see if you need more information.

Thanks Mike,

Chuck Johnston  
EHS / Operations Specialist  
432-202-4771 Cell  
432-248-8154 Office



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**From:** Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]  
**Sent:** Thursday, August 10, 2017 9:46 AM  
**To:** Daniel Dominguez; Weaver, Crystal, EMNRD; Chuck Johnston; brandon boone  
**Subject:** RE: Horse Creek Com #2 Work Plan 2RP-4071

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RE: Vanguard Operating \* Horse Creek Com 2 \* 2RP-4071 \* DOR: 12/20/16 (Discovery date)

Greetings,

In reviewing your proposal for remediation of the above referenced release, the following:

Your proposal is copied below. Based on photographs provided in the proposal document, it appears the impacted area has already been excavated to what appears to be approximately 4'-5' in depth.

- Was the excavated material hauled to a disposal?
- Is the proposed one foot horizontal and 3 feet vertical excavation in addition to what has already been excavated? What will be the disposition of any additional excavated material?
- I am unclear on where exactly the seven feet excavation w/liner will be relative to the well head.

**Proposed Actions:**

Based on field testing and laboratory analytical data, EPI proposes to excavate the sidewalls of the excavation one foot horizontally and approximately three feet bgs vertically. A 20-millimeter poly-ethylene liner will be installed in the deepest portion of the excavation, approximately seven feet bgs. The excavation will then be backfilled with clean soil.

Thanks in advance for clarification.

Mike Bratcher  
NMOCD District 2  
811 South First Street  
Artesia NM 88210  
575-748-1283 Ext 108

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**From:** Daniel Dominguez [<mailto:ddominguezeppi@gmail.com>]  
**Sent:** Wednesday, July 26, 2017 1:44 PM

**To:** Weaver, Crystal, EMNRD <[Crystal.Weaver@state.nm.us](mailto:Crystal.Weaver@state.nm.us)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>;  
Chuck Johnston <[cjohnston@vnrlc.com](mailto:cjohnston@vnrlc.com)>; brandon boone <[bboone.epi@gmail.com](mailto:bboone.epi@gmail.com)>

**Subject:** Horse Creek Com #2 Work Plan 2RP-4071

Ms. Weaver,

Attached for your review is the Work Plan for the Horse Creek Com #2, operated by Vanguard.

Sincerely,  
ENVIRONMENTAL PLUS, INC.

Daniel Dominguez  
Environmental Consultant/Safety Director

Environmental Plus, Inc.  
P.O. Box 1558  
2100 Avenue 'O'  
Eunice, NM 88231  
(575) 631-0401 (Cell)  
(575) 394-3481 (Office)  
(575) 394-2601 (fax)