

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["Lowry, Joel"; Bratcher, Mike, EMNRD; stucker@blm.gov](#)  
**Cc:** [Rebecca Haskell; "Stanley, Curtis D."](#)  
**Subject:** RE: 2RP-4359 - Loco Hills SWD 33 #004 - Remediation Summary and Site Closure Request  
**Date:** Friday, December 8, 2017 12:25:00 PM

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RE : COG \* Loco Hills SWD 33 #4 \* 30-015-37269 \* 2RP-4359

Becky/Joel,

The above referenced release is approved for closure.

**Please note:** I am approving this for closure but I do want to make a few statements regarding thought processes I noted within the Work Plan & Final Remediation reports on this project.

- I am not sure how it came to be concluded that checking in a radius of 1000 ft. for ground water wells was a conclusive way to determine site ranking score for that aspect of the ranking process. Depth to ground water relevant to site specific is and always will be uncertain unless borings are dug at location till ground water is reached. Now in the absence of data of that nature the nearest data from location is what can be relied upon as inconclusive but better than nothing. So for example for this site, the closest water well I could find that had documented depth to water was OSE RA-11914 which stated DTW at 80ft. So I would say you are accountable to adhere to that data unless you had something more relevant to this location or provided ground water data at the release location. Now I am not intending to be irrational if there is not a water well within many miles of the location then that could be conclusive that there are literally no relevant wells within even an extended proximity that are citable.
  - I will not impose the DTW data of RA-11914 upon this project this time since all work is done and based on analytical data provided site ranking would not have mattered if it was 0 or 30, I am only making this statement so that it is clear for future reference on future projects.
- Second I wanted to say thank you for providing data for all commonly requested contaminates throughout the vertical and horizontal sampling assessment of this location. It allows for a feeling of confidence on OCD's behalf that contaminates were gone and stayed gone. Also on chain of custody logs from Xenco I noted that samples were received by the lab at or extremely close to proper temperature. This is also notable. Thank you for being mindful of that aspect.
- Is or has the battery being/been rebuilt at this location?
- Also it is hard to tell from the pictures but if stock piles were not placed on top of a liner or some form of barrier please make sure to make a point of doing that in all future projects.

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.

If you have any questions or concerns, and for notification, please contact Mike Bratcher and/or myself in the District II Office.

## Crystal Weaver

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**From:** Lowry, Joel [mailto:JLowry@trcsolutions.com]

**Sent:** Friday, November 3, 2017 11:11 AM

**To:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; stucker@blm.gov

**Cc:** Rebecca Haskell <RHaskell@concho.com>

**Subject:** 2RP-4359 - Loco Hills SWD 33 #004 - Remediation Summary and Site Closure Request

Please find attached the *Remediation Summary and Site Closure Request* that has been prepared for Concho's Loco Hills SWD 33 #004 (2RP-4359). If you have any questions or need any additional information, please feel free to contact Rebecca Haskell or myself by phone or email. The Final C-141 is included as the last page in the report. Thanks.

Respectfully,

**Joel Lowry**

Senior Project Manager



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