

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["Lucas Middleton"; Bratcher, Mike, EMNRD](#)  
**Cc:** ["Zack Thomas"](#)  
**Subject:** RE: Work Plan for Layla 2RP-4507  
**Date:** Thursday, March 8, 2018 12:24:00 PM  
**Attachments:** [Approved work plan for 2RP-3626.pdf](#)  
[image002.png](#)

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RE: Mewbourne \* Layla 27 SWD #1 \* 30-015-22638 \* 2RP-4507

Zack/Lucas,

This work plan is not approved. Please see reasoning below.

- Previous interpretation of average depth to ground water data was misinterpreted during the ground water assessment efforts for the work plan provided on case 2RP-3626 (a copy of said work plan is provided above for your reference and also available for public review on OCD Online). If you consult pg. 12 which is an attachment of the OSE ground water data assessment that is within the work plan that was submitted for case 2RP-3626, you would find that the wrong data column was averaged (the column demarking depth of casing was averaged during original assessment) when attempting to generate a calculation for average dtw based on data the OSE website provided. If the correct column that actually has depth to water data was averaged the person doing the calculation at the time would have come up with an average number of 35.75ft. dtw. So since that data from case 2RP-3626 was referenced for this project we will go ahead and go along with that average of 35.75ft. dtw for this project. Which would thus change site ranking for this location to a score of 20. Meaning target delineation and clean up levels are now going to be 100 ppm TPH tested for extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>) using method 8015, Benzene is 10ppm and total BTEX is 50ppm tested via either Method 8260 or 8021, and chlorides are to be 600ppm or less and during assessment phase OCD will accept lab data using SM4500 Method however confirmation samples will require EPA Method 300.0 testing.
- Delineation for sample points L-2 and L-3 are not complete. No lab sample results for TPH or BTEX for any of the sample points were documented on the provided table. Therefore, OCD had to look thru the lab data report to see that in-fact those items were actually tested for, however, for L-1 TPH totals add up to more than 100ppm at depth of 3.5ft. so now, based on new site ranking score of 20, none of your sample points have been fully delineated. For every sample point all constituents that OCD has requested testing for need to be laboratory tested for in 1' intervals till lab data shows that RRALs and 600ppm or less for chlorides are met.
- Also the site map does not demark the location of where the background sample was taken. Further, a point labeled as R-1 is mentioned in the data table provided but not demarked on the map either, what is R-1 representing?
- The amount of sampling points provided are not representative of the area of the spill plume. Please conduct another sampling point between L-2 and L-3 and an additional one north of L-

3.

- Once an approved work plan is in place OCD will of course allow for Mewbourne/SMA to provide final confirmation lab samples to be provided for the final report, however, please note OCD will not accept composite sampling for side walls or bottom hole confirmation samples, providing field screening results is acceptable, however, lab tested samples will be what is primarily required/accepted as final samples per OCD COA requirements (see COA attachment sent for this release to operator on 1/8/18).

Please resubmit a work plan to OCD for review once the requested items have been achieved.

Thank you,

## Crystal Weaver

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**From:** Lucas Middleton [mailto:luucas.middleton@soudermiller.com]

**Sent:** Friday, February 16, 2018 9:47 AM

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

**Subject:** Work Plan for Layla 2RP-4507

Good Morning,

On behalf of Mewbourne Resources, SMA is submitting a work plan for a Layla 27 SWD. 2RP-4507.

Lucas Middleton

Staff GeoScientist

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