

**From:** [Weaver, Crystal, EMNRD](#)  
**To:** ["Boyle, Matthew"; Bratcher, Mike, EMNRD; Mann, Ryan](#)  
**Cc:** [Lupe Carrillo; Harlan, Charles](#)  
**Subject:** RE: Percussion Work Plan Aikman 2RP-4648  
**Date:** Tuesday, April 24, 2018 1:57:00 PM  
**Attachments:** [NMOCD Aikman Work Plan-Final.pdf](#)  
[image001.png](#)  
[1. 4648 - COAs and signed C-141 Initial.pdf](#)

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RE: Percussion \* Aikman SWD State #1 \* 30-015-21045 \* 2RP-4648

Hello all,

This work plan is denied by OCD.

The work plan delineation is not complete for chlorides at every sample point except for S-3 and delineation at S-1 is definitely not acceptable for chlorides, TPH, Benzene or total BTEX, all releases must have remediation action levels achieved. Just for clarification it is 10ppm for Benzene by itself, and no more than 50ppm for total BTEX which includes benzene's results needing to be added in as part of the total BTEX limits. Also sampling points are not frequently placed enough to be representative of the spill area size. Percussion states that this is a release that occurred due to tanks within the tank battery area having overflowed yet no samples were taken near or around the tank battery area. Please resubmit a work plan that shows delineation achieved and provides representative sampling efforts of the entire impact area. **Also samples will need to be re-ran by a lab that is able to conduct the laboratory methods that OCD requires please see the COA document that I have attached above for clarification on what those sampling methods are for their respective constituents.**

As I mentioned before Ryan Mann is the representative from the State Land Office that needs to be informed when a release occurs on State administered surface. I have included him above. Please continue to include him in all submissions for this case. I included a copy of the work plan attachment that was sent to OCD just in case he has yet to receive a copy of it since I don't see that he was included again when it was sent to us.

Thank you,

## Crystal Weaver

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**From:** Boyle, Matthew <Matthew.Boyle@wsp.com>

**Sent:** Thursday, April 19, 2018 8:30 AM

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

**Cc:** Lupe Carrillo <Lupe@percussionpetroleum.com>; Harlan, Charles <Charles.Harlan@wsp.com>

**Subject:** Percussion Work Plan Aikman 2RP-4648

Ms. Weaver/Mr. Bratcher,

Attached is the work plan for the remediation of Percussion Petroleum's Aikman SWD facility in Eddy County, case number 2RP-4648. On April 3 Crystal replied that the NMOCD was in receipt of the C-141 and a workplan for this facility. I believe the work plan she referenced was a preliminary assessment and sample results. The attached work plan addresses the proposed remedial efforts Percussion would like to perform.

Thank you,

**Matthew Boyle**

Sr. Environmental Scientist



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Leggette, Brashears & Graham is now WSP.