

## Bratcher, Mike, EMNRD

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**From:** Pruett, Maria, EMNRD  
**Sent:** Tuesday, November 27, 2018 5:48 PM  
**To:** Ronald Herrygers  
**Cc:** Bratcher, Mike, EMNRD; Billings, Bradford, EMNRD; 'John Kennedy'  
**Subject:** RE: [EXT] RE: New Rule Links 2RP-4730  
**Attachments:** 4. USGS Groundwater for USA\_ Water Levels -- 3 sites 2RP-4730.pdf

Hello Mr. Herrygers,

Here is the data. Does the site currently monitor ground water? There are wells in the area that are less than 50' and the area also has karst that is of concern, so the closure criteria will be to the most protective Table 1 which was stated below and in the rule.

Best Regards,

*Maria Pruett*

Environmental Specialist  
N.M. Oil Conservation Division  
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**From:** Ronald Herrygers <rherrygers@windstream.net>  
**Sent:** Tuesday, November 27, 2018 5:36 PM  
**To:** Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'John Kennedy' <jkennedy@entech-us.com>  
**Subject:** [EXT] RE: New Rule Links 2RP-4730

Maria:

Please forward me a copy of the 2 USGS wells that show a depth less than 50 feet deep.

I also wanted to ask.....if I'm reading this new rule correctly, if we measured the depth to groundwater through monitoring wells on-site and identified from 2-3 monitoring wells that the depth to groundwater in all 3 of those wells was below 50 feet, it would seem that this would change the Closure Criteria that we would use at the site. Is this your understanding too?

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**From:** Pruett, Maria, EMNRD [<mailto:Maria.Pruett@state.nm.us>]  
**Sent:** Tuesday, November 27, 2018 7:10 PM  
**To:** [rherrygers@windstream.net](mailto:rherrygers@windstream.net)  
**Cc:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Subject:** New Rule Links 2RP-4730

Hello Mr. Herrygers,

Thank you for speaking with me this afternoon. Below are links to the Revised Spill Rule and updated C-141 forms. The area around 2RP-4730 has medium karst as well as 2 USGS wells that show depth to ground water to be less than 50', therefore the spill should be remediated to the most protective standard that includes: Chlorides < 600 mg/kg and TPH < 100 mg/kg, these numbers will be found in Table 1 in the revised rule. Please also note that final samples must include all 4 constituents and any spill off pad should have the top 4' be of non-waste containing, uncontaminated material so those samples should be at non-detect or the same as a background sample.

Moving forward the point of contact for this spill will be Mr. Brad Billings, cc'd above. Please let me know if you have any questions or need further assistance.

Revised Rule: <http://www.emnrd.state.nm.us/OCD/documents/NaturalResourcesWildlifeOilandGasReleases.pdf>  
Updated C-141: <http://www.emnrd.state.nm.us/OCD/forms.html>

Best Regards,

*Maria Pruett*

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