Bratcher, Mike, EMNRD

From: Ronald Herrygers <rherrygers@windstream.net>

Sent: Thursday, December 20, 2018 8:55 AM

To: Billings, Bradford, EMNRD
Cc: Bratcher, Mike, EMNRD

Subject: FW: [EXT] 2RP-4730 - Queen 2324 - Northeast of Intersection of Pecos Highway & Pulley Road

(County Road 721), South of Malaga, New Mexico - 11-28-18

Attachments: Well Log & Plugging Plan.pdf

Brad:

I just received the actual well log record from the driller, who drilled our recent temporary well on-site to 60 feet and did not identify any water. This well log contains the site lithology and confirms no water was identified in any of the units to a depth of 60 feet. The well log is attached to the previously submitted Well Plugging Plan of Operations, as 2 additional pages.

Please let me know if you have any questions about this.

FYI.....we are close to having excavated about 50% of the chloride contaminated soil on-site, but will be off for 2 weeks due to the upcoming Christmas break, then will be resuming work on-site.

Ronald F. Herrygers, P.G.

Herrygers Environmental Services, LLC

Office phone: (803) 951-8947

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From: Ronald Herrygers [mailto:rherrygers@windstream.net]

Sent: Sunday, December 16, 2018 11:03 AM

To: 'Billings, Bradford, EMNRD' <Bradford.Billings@state.nm.us> **Cc:** 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>

Subject: RE: [EXT] 2RP-4730 - Queen 2324 - Northeast of Intersection of Pecos Highway & Pulley Road (County Road

721), South of Malaga, New Mexico - 11-28-18

Brad:

I wanted to provide you with a copy of our well driller's "Well Plugging Plan of Operations" (see attached). Our driller (Third Generation Drilling) drilled a boring to 60 feet just outside of the brine affected area on December 8, 2018. He returned to the site on December 10, 2018 to sound the well and did not identify any water in the well borehole. He subsequently abandoned the borehole.

Because no groundwater was identified on-site to at least a depth of 60 feet, the Cleanup Criteria we are using for chloride concentrations in soil below 4 feet is 10,000 mg/kg. As per the new rule's restoration criteria we are still removing all soils with chloride concentrations over 600 mg/kg in the upper 4 feet of the spill affected area.

To date, we have excavated between 25-35% of the targeted excavated soil and will be resuming excavation this coming week, but work will cease during the upcoming Christmas holidays and then resume in January 2019. We also plan to begin collecting some of our confirmation soil samples from the excavated areas this coming week.

Please let me know if you have any questions at this time. Otherwise, we will submit the required Forms/Report required under the new rule, once we have completed site remediation activities.

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From: Billings, Bradford, EMNRD [mailto:Bradford.Billings@state.nm.us]

Sent: Wednesday, November 28, 2018 6:23 PM **To:** Ronald Herrygers rherrygers@windstream.net>

Subject: RE: [EXT] 2RP-4730 - Queen 2324 - Northeast of Intersection of Pecos Highway & Pulley Road (County Road

721), South of Malaga, New Mexico - 11-28-18

Hi,

Sorry I did not get a chance to call back today. I agree with yours' and Mike's assessment tool of boring for determination of or lack of groundwater. Thanks for the information and thank you for keeping me informed as it goes forward.

Bradford Billings OCD/Santa Fe

From: Ronald Herrygers < rherrygers@windstream.net>

Sent: Wednesday, November 28, 2018 4:15 PM

To: Billings, Bradford, EMNRD < <u>Bradford.Billings@state.nm.us</u>> **Cc:** Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us>

Subject: [EXT] 2RP-4730 - Queen 2324 - Northeast of Intersection of Pecos Highway & Pulley Road (County Road 721),

South of Malaga, New Mexico - 11-28-18

Brad:

I had a discussion with Mike Bratcher about the work that we are beginning at the above referenced production water spill that occurred on April 28, 2018. We are beginning the excavation work tomorrow, but we also will be drilling a temporary monitoring well at the site soon, for the sole purpose of determining the current depth of groundwater at the site. Mike confirmed that use of the depth to groundwater of a temporary monitoring well to be drilled at the site (as opposed to use of other farther away database well information) is acceptable. We will use the depth to groundwater in this new on-site well to determine our Cleanup Criteria.

Our remediation is being performed in accordance with the new Spill Rule. Contractors we have working on-site is En Tech (professional consultant) and EES (excavation contractor).

Please let me know if you have any questions at this time.

Mike requested that I periodically keep you updated and copy him, until we are ready to submit the required forms, as required under the new Spill Rule.

Thank you.

Ronald F. Herrygers, P.G.

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