

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Wednesday, October 23, 2019 1:37 PM
To: Littrell, Kyle
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; blm_nm_cfo_spill@blm.gov
Subject: Remediation Conditional Approval - XTO - PCA 53 - (2RP-5169) 11-27-2018
Attachments: Remediation Conditional Approval - XTO - PCA 53 - (2RP-5169) 10.21.19.pdf

Kyle,

We have received your Workplan/Remediation Proposal for **2RP-5169 PCA 53**, thank you. This Workplan/Remediation proposal is conditionally approved.

The OCD is conditionally approving the Remediation Plan under the following conditions:

- A variance of 1,000 sq. feet on the floor samples
- A variance of 500 sq. feet on side wall samples
- XTO finishes excavating to 7 feet bgs
- Drill 3 groundwater (monitoring) wells. One near core hole, one down gradient, and one up gradient to be used for collecting background water samples (Please do not put wells in a straight line)
- 4 additional boreholes be drilled outside of the release extent to further laterally delineate the release. Convert boreholes to monitoring wells if oil/water is found. Try to pump fluid out as quickly as reservoir recharges, measure oil/water ratio (Weekly or Monthly). Continue to step out and drill boreholes until oil/water is not found
- Determine recharge time on boreholes B14 and B16. Set tank nearby, pump fluid as quick as reservoir recharges. Record oil/water ratio on regular time schedule (Weekly or Monthly). Ideally, the oil/water ratio heads toward zero at some point, most of the mobile oil is pumped out and recaptured. Proposal to check weekly is not approved at this time. OCD requests a recharge rate be established.
- Additional delineation will be required @ PH5, PH6, and PH7. Sample interval and lab data should be obtained in a manner to determine total BTEX/TPH concentrations
- Develop a site conceptual model using subsurface geologic and hydrologic data

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Robert.Hamlet@state.nm.us

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 groundwater, 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, or local laws and/or regulations.