

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, February 13, 2020 10:44 AM
To: 'WSoderstrom@kje-us.com'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD
Subject: Delineation and Site Characterization Report - Oilfield Water Logistics - Fulfer Saltwater Disposal Facility - (1RP-5489)

William,

We have received your Workplan/Remediation Proposal for **1RP-5489 Fulfer Saltwater Disposal Facility**, thank you. This Workplan/Remediation proposal is denied.

- We noticed that you checked “No” on the Initial C- 141 for “Is the concentration of dissolved chloride in the produced water >10,000 mg/l”. Almost all water pulled out of the ground in this Delaware Basin is over 10,000 mg/l. Please collect a sample of the water before it is injected and have it lab tested for chlorides, so we have accurate analytical data. Usually, a spill of this size would have some high chlorides at the surface. If the analytical data on the water sample comes back over 10,000 mg/l, please conduct samples on the surface to verify chloride levels. The soil boring 0-2’ leaves us wondering if the sample was taken at surface, 2 feet, or a composite of the interval?
- The OCD does not consider a caliche surface “impervious”
- Please include signed/dated C-141 pages 3-6 in your new report and then reload onto the Payment Portal.

Please let me know if you have any further questions.

Regards,

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