From:	Hamlet, Robert, EMNRD
То:	<u>"chris@pimaoil.com"; "Bynum, Tom (Contract)"</u>
Cc:	<u>Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; BLM SPILL</u> (blm_nm_cfo_spill@blm.gov)
Subject:	Remediation Conditional Approval - Devon - Ice Dancer 30 Fed Com #2H - (Incident #NAB1834553041) (2RP- 5099)
Date:	Monday, October 5, 2020 2:55:00 PM
Attachments:	Remediation Conditional Approval - Devon - Ice Dancer 30 Fed Com #2H.pdf

Chris and Tom,

We have received your Workplan/Remediation Proposal for **Incident #NAB1834553041** Ice Dancer **30 Fed Com #2H**, thank you. This Workplan/Remediation proposal is approved with the following conditions:

- This release has occurred in a High Karst area and will need to be remediated to the strictest closure criteria of <50' depth to groundwater from Table 1 of the spill rule. The current spill rule may be viewed here: http://164.64.110.134/parts/title19/19.015.0029.html
- When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.
- Please continue to horizontally delineate sample points to 600 mg/kg for chlorides and TPH to 100 mg/kg on the outer edges/periphery and include sample points in your next report after closure criteria limits have been met. The edges (horizontal definition) of a liquid release must be determined. The only value for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. This 600 mg/Kg value is discussed in detail in 19.15.29.13 D. (1).
- Sample location 4 involved rock refusal. The OCD would prefer that the soil be excavated and the following procedure be followed if rock refusal is encountered:
 - a. <u>If rock refusal interferes with the remediation process, use a back-hoe/track-hoe to</u> remove the rock
 - b. If the rock is immovable and target depth cannot be reached, use a hydrovac to clean the contaminated soil off of the rock surface and outline specific locations and steps taken on the Closure Report
 - c. <u>Use a rotary drill to drill a 18"-24" hole into the rock, pull sample to ensure</u> contaminants haven't permeated deep through the rock surface
 - d. <u>layer the cleaned rock with Micro-Blaze or liquid with microbial strains, surfactants</u> and nutrients designed to digest organics and hydrocarbons
 - e. Back-fill with clean material

Please let me know if you have any further questions.

Regards,

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.