



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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November 29, 2005

REMEDIATION WORK PLAN REQUEST - MALLARD HM NO. 2

The New Mexico Oil Conservation Division District 2 Office is in receipt of your letter dated 11-28-05 which states "The concerns noted (in the 28-Oct-05 OCD Letter) have been addressed" and that Mr. Mike Stubblefield (Yates) informed Mr. Van Barton (OCD District 2 Office) of "sampling and work being performed on 11-09-05".

Mr. Stubblefield contacted Mr. Barton on November 11, 2005 to inform the OCD that Yates was scheduling what Mr. Barton considered to be site characterization work that was to begin on Monday, November 14, 2005. Mr. Stubblefield then visited the OCD District 2 Office on Monday, November 14, and met with Mr. Mike Bratcher and reaffirmed that the samples were not for submission to the OCD but were for determination of work necessary to remediate this release.

OCD Rule 19.15.3.116.D requires that the responsible person for a release must complete division approved corrective action and that releases will be addressed in accordance with a remediation plan submitted to and approved by the division. **Since the OCD District 2 Office has received no remediation work plan and has not approved any corrective actions for this location then the remediation for the release noted in the Notice of Violation Letter of 28-Oct-05 have not been addressed to OCD approval.**

To provide you with approval for corrective actions the OCD District 2 Office must first receive a remediation work plan that addresses, at a minimum, the following:

- Site characterization, ranking, layout, and remediation action levels and to what levels remediation work will target at each phase (i.e. excavation, land farming, tilling);
- Release characterization including source, cause, prevention of future release, volumetric estimation of impacted area(s) and contaminant specific concerns;
- On site method of remediation including specific procedures for moisture/nutrients/additives to enhance biodegradation of the contaminants, specific to Highly Contaminated/Saturated Soils and Unsaturated Contaminated Soils;
- Off site remediation including sampling procedures for removed material, disposition of materials and documentation required;
- Notification to NMOCD of work/sampling and sampling procedures to be used for site characterization and final closure;
- General schedule of work to be performed including periodicity of repeated work such as tilling/moisture, etc; and,
- Site closure procedures (closure of excavations, reseeding, grading, etc).

Please provide a remediation work plan for this release to the OCD District 2 Office prior to December 20, 2005.

The OCD District 2 Office uses the "Guidelines For Remediation of Leaks, Spills, and Releases" to evaluate the adequacy of all remediation work plans submitted for approval. A copy of the checklist I use when reviewing remediation work plans is attached so that you may see the areas I evaluate when considering a work plan for approval. Please feel free to contact me if I can be of further assistance in this matter.


Chris Beadle
Artesia OCD District Office

Remediation Work Plan Checklist

Location Name: _____ API/Fac ID/Incident #: _____

Unit Letter: _____ Section _____ Township _____ Range _____ Latitude: _____ Longitude: _____

Surface Owner: _____

Was Surface Owner Contacted? Yes ☐ No ☐ Insufficient ☐

Surface Owner Required Actions? Yes ☐ No ☐ Insufficient ☐

Released Material:

_____	BBL with _____	BBL of liquid recovered and _____	Yards contaminated soil to be remediated
_____	BBL with _____	BBL of liquid recovered and _____	Yards contaminated soil to be remediated
_____	BBL with _____	BBL of liquid recovered and _____	Yards contaminated soil to be remediated

Source of Release ID'd: Yes ☐ No ☐ Insufficient ☐

Suspected Cause of Release ID'd: Yes ☐ No ☐ Insufficient ☐

Steps taken to prevent future Release provided: Yes ☐ No ☐ Insufficient ☐

Watercourse Impacted? Yes ☐ No ☐ Insufficient ☐

Site Ranking _____ (GW _____ WPA _____ SWB _____)

RRAL: Benzene _____ BTEX _____ TPH _____ Chlorides (Background Level) _____

Are the following addressed?

Highly Contaminated/Saturated Soils?: Yes ☐ No ☐ Insufficient ☐

Unsaturated Contaminated Soils?: Yes ☐ No ☐ Insufficient ☐

On Site Method of Remediation?: Yes ☐ No ☐ Insufficient ☐

Moisture/Nutrients/Additives to Enhance Biodegradation of the Contaminants?: Yes ☐ No ☐ Insufficient ☐

Off Site Remediation?: Yes ☐ No ☐ Insufficient ☐

Notification to NMOCD of work/sampling?: Yes ☐ No ☐ Insufficient ☐

Sampling Procedures?: Yes ☐ No ☐ Insufficient ☐

Will contaminated soils be remediated so that residual concentrations are below the RRAL?: Yes ☐ No ☐ Insufficient ☐

Is a general schedule of work provided?: Yes ☐ No ☐ Insufficient ☐

Is Site Closure addressed?: Yes ☐ No ☐ Insufficient ☐