

From: [Smith, Cory, EMNRD](#)
To: [Lindsay Dumas](#)
Cc: [Hernandez, Emily, EMNRD](#); [Polak, Tiffany, EMNRD](#); [Griswold, Jim, EMNRD](#); [Powell, Brandon, EMNRD](#); ["Billings, Bradford, EMNRD"](#)
Subject: San Juan 28-6 Unit #125 incident# nRM2030132715
Date: Monday, March 15, 2021 10:28:00 AM

Ms. Dumas,

OCD has reviewed the Site Characterization and Remediation Plan for the San Juan 28-6 Unit #125 incident# nRM2030132715 submitted to the OCD on December 30, 2020 and has denied the report due to the following deficiencies:

1. The area downgradient of the suspected release source has not been sufficiently delineated. Therefore, OCD requests that additional delineation, pursuant to 19.15.29.11 NMAC, between BH-8 and BH-9.



2. The remediation plan provided did not provide adequate information to assess the effectiveness of the proposed SVE system. OCD requests that an SVE pilot test be performed to confirm the following:
 - a. Radius of effect/influence for proposed placement of SVE well locations,
 - b. That the length of the proposed screen intervals will be sufficient for effective remediation in both the shallow sands and deeper sandstones,

- c. That the size of the required pump is sufficient to reach all impacted areas,
- d. The potential for passive air inlets at specific depths for effective remediation.

Upon completion of the pilot test, OCD requests information regarding proposed zone runtimes and SVE maintenance schedules.

3. OCD requests a schematic of the SVE zones, SVE well construction, and SVE pump/knock-out-tank assembly – which were not include in the December 23rd Site Characterization and Remediation Plan.
4. Hilcorp's depth to water assessment of greater than 100' was found to be inaccurate. OCD review of ground water in the area indicates that depth to water could be less than or equal to 75' at the San Juan 28-6 #125.
 - a. This data originated from a cathodic well report located at the San Juan 28-6 Unit #60 approximately 650' north west.
 - b. Due to the historical nature of the release and the length of proposed remediation, OCD is requesting that the spring downgradient be sampled to established a baseline. The spring water should be analyzed for TDS, pH, Cation, Anion, BTEX (EPA 8260(Long list), TPH(EPA 8015)
1. Within the next two weeks Hilcorp will need to schedule a meeting with the OCD to discuss a proposed timeline that Hilcorp can acquired the required information for resubmission of the Site Characterization and Remediation plan. Upon completion of the meeting, the OCD will provide an updated version of this letter of deficiencies to include a timeline for submission to the OCD E-permitting portal.

Thank you,

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