

From: [Yu, Olivia, EMNRD](#)
To: garymorehead@leaco.net
Cc: [NMSLO \(Hobbs/Amber Groves\)](#)
Subject: delineation requirements for Mark Shidler State I-30
Date: Wednesday, November 29, 2017 10:17:00 AM
Attachments: 1RP4858.pdf

Good morning Mr. Morehead:

Nice to meet you on November 22, 2017, at the Mark Shidler State I-30 site. In addition to NMSLO stipulations, NMOCD requires the impacted area for 1RP-4858 to be delineated per the directive outlined in the attachment. Due to the presence of a playa approximately 750 ft. west of the battery and average depth to groundwater at 64 ft. bgs, all sample locations must have laboratory analyses of at least two depths demonstrating permissible BTEX, TPH extended, and chloride levels: depth obtained and depth maintained permissible levels. For chlorides, 600 mg/kg must be obtained and maintained for 10 ft. further in depth. Include all field data for soil samples from depths not sent to a laboratory. All laboratory analyses must have accompanying field data.

A typical delineation report at a minimum should include these items:

1. A scaled, preferably digital, map of the site with location of release, locations of sample points, and dimensions of the release demarcated. Demarcate on the map or provide a table on a subsequent page of sample points and respective GPS coordinates.
2. A) Documentation of depth to groundwater search. Go to <http://nmwrrs.ose.state.nm.us/nmwrrs/waterColumn.html>
You may search with PLSS, but optimally use the UTM NAD83 radius search. Use the UTM conversion tool to get GPS coordinates in lat/long degrees into UTM coordinates. Use a radius of approximately a section (1700 m).
B) Check on a topographical map and report distance to surface water body and water source.
I completed this for you. Still, please include in the report either in the text or pdfs of sources.
3. Tabulate field and analytical results for chlorides, BTEX, and TPH with IDs and depth of samples. Put the laboratory reports and chain of command afterwards or in an appendix.
4. Georeferenced photos in tiff, jpg, jpeg etc. format if available. This is easiest if photos are taken with a smartphone with GPS location activated. Otherwise, provide photos that were taken from the same spot pre- and post-cleanup.
5. Attach a copy of the reviewed initial C141.
6. Any releases on State leases (such as this one) will need like approval from Amber Groves (State Land Office). Please remember to include NMSLO in all communications. A revegetation plan may be required.

A proposed remediation plan can be suggested based on the delineation results, but NMOCD reserves the right to request further vertical/horizontal delineation or alternate remediation plans. Also, please inform NMOCD and NMSLO when field sampling to provide witnessing opportunities and guidance.

Thanks,

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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 ground water, 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, local laws and/or regulations.