

**From:** [Raley, Jim](#)  
**To:** [Wells, Shelly, EMNRD](#); [Bratcher, Michael, EMNRD](#)  
**Subject:** RE: [EXTERNAL] NAB1506157520 LAGUNA SALADO SOUTH #001  
**Date:** Wednesday, April 30, 2025 10:37:37 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

Shelly,

Thanks for reaching out about any questions regarding this site.

The background sample collected at surface on 9/13/2024 has 46.2 TPH and chlorides on 16500 mg/kg/

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')								
DEVON ENERGY - Laguna Salado South #1 - nAB1506157520								
Date: 9/13/24		NM Approved Laboratory Results						
Sample ID	Depth (BGS)	BTEX mg/kg	Benzene mg/kg	GRO mg/kg	DRO mg/kg	MRO mg/kg	Total TPH mg/kg	Cl mg/kg
BG North-Surface	0'	ND	ND	ND	46.2	ND	46.2	16500
BG North-1'	1'	ND	ND	ND	ND	ND	0	14100
BG North-2'	2'	ND	ND	ND	ND	ND	0	13200
BG North-3'	3'	ND	ND	ND	ND	ND	0	13100
BG North-4'	4'	ND	ND	ND	ND	ND	0	12700

The follow-up samples collected on 3/10/2025 near BG North show much lower chlorides and Non-Detect on TPH.

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')								
DEVON ENERGY - LAGUNA SALADO SOUTH #001 - nAB1506157520								
Date: 3/10/25		NM Approved Laboratory Results						
Sample ID	Depth (BGS)	BTEX mg/kg	Benzene mg/kg	GRO mg/kg	DRO mg/kg	MRO mg/kg	Total TPH mg/kg	Cl mg/kg
1-Surface	0'	ND	ND	ND	ND	ND	ND	1700
2-Surface	0'	ND	ND	ND	ND	ND	ND	ND
3-Surface	0'	ND	ND	ND	ND	ND	ND	ND

One possibility for the differences we are noticing in the soil samples could be attributed to dust blowing in and settling on the surface. The source of this dust would be the nearby salt evaporation pond utilized in potash production. Given that our site is located at the edge of this large, several hundred-acre salt evaporation pond that does not have a liner to prevent salts from mixing with soils, we might see fluctuations in soil composition. Salt impacted soils could be deposited during one season and vary significantly in the next season, impacting surface samples.

This evaporation pond often remains dry, which can lead to the generation of dust laden with high chloride values. Seasonal dust storms are common in Southeast New Mexico, and these storms could potentially affect nearby soil conditions, depending on the prevailing wind direction. Understanding these factors will be crucial for our determining a suitable background value for chlorides, and I appreciate any further insights or recommendations you might have as we move forward on this unique site.

I do not think this is the only possibility, but I am inclined to think that this particular pad has a high likelihood of having direct influence from the adjacent evaporation ponds, simply due to proximity. Does NMOCD has any specific requests for the establishment of acceptable background chloride values, given this well pad is situated on the edge of a basin filled with soil that has exceeding high chlorides?

Location at 32.2921, -103.9748



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**From:** Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>  
**Sent:** Friday, April 25, 2025 1:29 PM  
**To:** Raley, Jim <Jim.Raley@dvn.com>  
**Cc:** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>  
**Subject:** [EXTERNAL] NAB1506157520 LAGUNA SALADO SOUTH #001

Good afternoon Jim,

I have recently reviewed the remediation closure report for NAB1506157520 LAGUNA SALADO SOUTH #001 and have a question for you regarding this. Referring to the attached Tables which

were extracted from the report, explain why the samples collected at surface on 3/10/25 within 10 feet of the original BG North sample point (as shown on the Investigation Sample Map) differ so greatly in their chloride concentrations from the previous samples collected on 9/13/24? I look forward to hearing what you have to say regarding this.

Sincerely,

Shelly

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CONDITIONS

Action 460544

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 460544
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	5/9/2025