GW - 4

and the second sec

GENERAL CORRESPONDENCE

2008 - 2010

Griswold, Jim, EMNRD

From:	Griswold, Jim, EMNRD

Sent: Wednesday, October 22, 2008 10:09 AM

To: 'Homer, Jenee' M'

Subject: RE: North Eunice Gas Plant GW-4

Jenee,

As such, the 7/15/08 workplan is approved and you may proceed with the investigation. Please contact me at least 72 hours prior to starting field operations. Thank you.

Jim Griswold

From: Homer, Jenee' M [mailto:JHomer@chevron.com]
Sent: Tuesday, October 21, 2008 3:44 PM
To: Griswold, Jim, EMNRD
Subject: RE: North Eunice Gas Plant GW-4

Mr. Griswold,

Please find below the requested clarifications per our discussion on October 8, 2008 pertaining to the *North Eunice Chlorides Investigation Work Plan* dated July 15, 2008. For ease of review, I have formatted the response by stating your comment and immediately followed your comment with the requested related clarification.

1) At this point, I need more specific information regarding the anticipated locations of the soil borings associated with this scope of work.

As stated in the *North Eunice Chlorides Investigation Work Plan* dated July 15, 2008, the exact number and location of borings will be determined in the field based on results of field screening activities. An initial boring will be placed in each identified AOC in the location that most approximates the anticipated location of the original source – based on file reviews and above ground visual observations. Subsequent boring locations will then be determined in the field base on field screening results.

2) I am also not comfortable with chloride testing being undertaken solely on soil cuttings "blown" out of the bore during advancement. This would not provide adequate depth control of the chloride or lithologic data.

Harrison & Cooper of Lubbock, Texas will be utilized to advance borings through standard air rotary techniques. One condition of air rotary boring advancement is the affect on collection of lithologic data. However, this is not considered an issue with assessment protocol at this particular Site (North Eunice) due to the large amount of lithologic data available through previous wide-spread soil boring advancement in the area. Specifically: AOC 1 contains two existing wells and eight additional wells within 500 feet; AOC 2 contains five existing wells and greater than 20 additional wells within 500 feet; AOC 3 contains ten existing wells and greater than 20 additional wells within 500 feet; AOC 4 contains four existing wells and greater than 20 additional wells within 500 feet; and AOC 6 contains 18 existing wells (10 monitor wells and 8 injection wells) and greater than 20 additional wells within 500 feet.

3) To my knowledge. HACH does not make a chloride test kit for soils, only water. I understand this is only being used as a screening tool, but it would be better if SECOR provided more in-depth descriptions of the field testing method.

HACH does make the chloride kit for water. However, there is a standard procedure for testing soil using the water testing kit. The procedure for testing soil using the water testing kit, which field personnel will follow, is detailed below:

- 1) Measure 25 grams of soil into a small plastic snap cup container;
- 2) Add 100 ml of DI water and shake for approximately 20 seconds to dissolve soil in water;

3) Pour water and soil mixture through filter paper into second snap cup until approximately 10 to 15ml of water has filtered through;

4) Insert titration slip into solution and allow chloride strip to sit in solution until orange line at the top has turned black;

5) Read number from titration strip (read off of the top of the white line on strip) and compare it to the corresponding chloride mg/l on the bottle; and

6) Multiple chloride mg/L by 4 (dilution factor).

Jeneé Homer (last name change from Briggs)

Project Manager

Chevron Environmental Management Company

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From: Griswold, Jim, EMNRD [mailto:Jim.Griswold@state.nm.us]
Sent: Monday, August 18, 2008 10:20 AM
To: Homer, Jenee' M
Subject: North Eunice Gas Plant GW-4

Jenee,

Oversight of Chevron's efforts at the former North Eunice Gas Plant (OCD Discharge Permit GW-4) have been reassigned from Glenn von Gonten to myself. I have begun review of historic data and specifically the Chlorides Investigation Workplan dated July 15, 2008 prepared by SECOR. At this point, I need more specific information regarding the anticipated locations of the soil borings associated with this scope of work. I am also not comfortable with chloride testing being undertaken solely on soil cuttings "blown" out of the bore during advancement. This would not provide adequate depth control of the chloride or lithologic data. To my knowledge. HACH does not make a chloride test kit for soils, only water. I understand this is only being used as a screening tool, but it would be better if SECOR provided more in-depth descriptions of the field testing method. Why are soil samples being shipped across the country to Pennsylvania? Please contact me at your earliest convenience. Thank you.

Jim Griswold

Hydrologist

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