

3R - 444

**GEN
COR**

2012 - 2013

VonGonten, Glenn, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Friday, May 31, 2013 10:09 AM
To: Webre, Matt (Matt.Webre@Williams.com); Ashley Ager (aager@ltenv.com); Powell, Brandon, EMNRD
Cc: Dawson, Scott, EMNRD
Subject: Dogie CS J Vent Remediation Plan
Attachments: 2013_0531 RP Approval.pdf

Matt,

OCD has reviewed W4C's revised remediation plan for the Dogie CS J Vent site. OCD hereby approves the revised remediation plan and W4C may implement it immediately. Please use OCD Case Number **3R – 444** in all future correspondence.

If you have any questions, please call me at 505-476-3488.

Thanks.

Glenn von Gonten

Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3488
Fax-476-3462
glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/oed/>

VonGonten, Glenn, EMNRD

From: Webre, Matt <Matt.Webre@Williams.com>
Sent: Tuesday, May 28, 2013 7:39 AM
To: Webre, Matt; VonGonten, Glenn, EMNRD
Cc: Ashley Ager (aager@ltenv.com); Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy; Potochnik, Mark; Dawson, Scott, EMNRD
Subject: RE: Status of Dogie J-Vent Work Plan to Address Groundwater Impacts

Glenn,

Just following up again on your review. Could you please provide me with a update. I would really appreciate it.

Matt

From: Webre, Matt
Sent: Tuesday, May 14, 2013 4:23 PM
To: 'VonGonten, Glenn, EMNRD'
Cc: 'Ashley Ager (aager@ltenv.com)'; 'Powell, Brandon, EMNRD'; 'Perrin, Charlie, EMNRD'; 'Sanchez, Daniel J., EMNRD'; Hill, Laura; Dale, Nancy; Potochnik, Mark; 'Dawson, Scott, EMNRD'
Subject: RE: Status of Dogie J-Vent Work Plan to Address Groundwater Impacts

Glenn,

Can you provide the status on this review?

Thanks,
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From: Webre, Matt
Sent: Wednesday, April 24, 2013 7:11 AM
To: 'VonGonten, Glenn, EMNRD'
Cc: Ashley Ager (aager@ltenv.com); Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy; Potochnik, Mark; Dawson, Scott, EMNRD
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matt.webre@williams.com

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Wednesday, April 10, 2013 4:11 PM

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Cc: Ashley Ager (aager@ltenv.com); Cardoza, Clara; Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy

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Attachments: Dogie J-Vent - BOS Remediation Plan, 4-23-13.pdf

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Cc: Ashley Ager (aager@ltenv.com); Cardoza, Clara; Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy
Subject: RE: Status of Dogie J-Vent Work Plan to Address Groundwater Impacts

Matt,

I am in the process of reviewing W4C's workplan. In conducting a file review of the Dogie CS, I notice that there were remediation plans for two pits. The earlier correspondence refers to PNM's generic San Juan Basin Ground Water Monitoring Plan. I would appreciate a copy of it and Williams generic ground water monitoring plan. Thanks.

Glenn von Gonten

Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
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Santa Fe, New Mexico 87505
505-476-3488
Fax-476-3462
glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

From: Webre, Matt [<mailto:Matt.Webre@Williams.com>]
Sent: Monday, April 01, 2013 2:09 PM
To: VonGonten, Glenn, EMNRD
Cc: Ashley Ager (aager@ltenv.com); Cardoza, Clara; Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy
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Glenn,

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Please let me know the status of the your review so we can plan accordingly.

Thanks,

Matt Webre, P.G.
Environmental Specialist III
Williams Four Corners, LLC
(505) 632-4442 work
(505) 215-8059 cell
(505) 632-4782 fax
matt.webre@williams.com

VonGonten, Glenn, EMNRD

From: Webre, Matt <Matt.Webre@Williams.com>
Sent: Tuesday, April 09, 2013 9:11 AM
To: VonGonten, Glenn, EMNRD
Cc: Ashley Ager (aager@ltenv.com); Cardoza, Clara; Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy
Subject: RE: Status of Dogie J-Vent Work Plan to Address Groundwater Impacts
Attachments: SanJuanGWManageplan-1997-WFS.PDF

Glenn,

I looked through my correspondence and couldn't find any reference in regards to the PNM monitoring plan. The only thing I recollect is that we provided background data for cations/anions from the Dogie North pit [Section 20.6.2.3106B (3) of the current work plan]. Attached is the San Juan Basin Groundwater Monitoring Plan at your request which also includes a generic groundwater monitoring plan.

In regards to the reference of the two pits, as you are likely aware, Williams has performed groundwater monitoring for the Dogie East and Dogie North pits. The area for which the Dogie J-Vent is located is in the vicinity of the former Dogie North pit.

Matt

From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Monday, April 08, 2013 3:58 PM
To: Webre, Matt
Cc: Ashley Ager (aager@ltenv.com); Cardoza, Clara; Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD; Hill, Laura; Dale, Nancy
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matt.webre@williams.com

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Attachments: RE: Dogie J-Vent Status Review

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VonGonten, Glenn, EMNRD

From: Ashley Ager <aager@ltenv.com>
Sent: Monday, February 25, 2013 1:41 PM
To: VonGonten, Glenn, EMNRD
Subject: RE: Possible Meeting

Great! Matt and I will call you at 3:30.

Ashley Ager
Senior Geologist/Office Manager
(970) 385-1096 direct

From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Monday, February 25, 2013 1:33 PM
To: Ashley Ager
Subject: RE: Possible Meeting

Give me a call about 3:30 at 505-476-3488.

Glenn von Gonten
Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
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From: Ashley Ager [mailto:aager@ltenv.com]
Sent: Monday, February 25, 2013 9:14 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: Possible Meeting

OK. Would it be possible to have a conference call this afternoon? Maybe around 3 or 3:30?

Ashley Ager
Senior Geologist/Office Manager
(970) 385-1096 direct

From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Monday, February 25, 2013 9:07 AM
To: Ashley Ager
Subject: RE: Possible Meeting

Ashley,

I will be out of the office Tuesday through Thursday.

Glenn von Gonten

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From: Ashley Ager [<mailto:aager@ltenv.com>]
Sent: Wednesday, February 20, 2013 2:35 PM
To: VonGonten, Glenn, EMNRD
Cc: Webre, Matt
Subject: Possible Meeting

Hi Glenn,

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To: VonGonten, Glenn, EMNRD
Cc: Webre, Matt
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Attachments: BOS Remediation Plan.pdf

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From: Webre, Matt <Matt.Webre@Williams.com>
Sent: Thursday, January 10, 2013 9:25 AM
To: VonGonten, Glenn, EMNRD
Cc: Ashley Ager; Cardoza, Clara
Subject: FW: Dogie J-Vent Status Review
Attachments: BOS Dogie Work Plan, 11-30-12.pdf

Glen,

I spoke with Ashley and she mentioned you were not able to locate the work plan I submitted on November 30, 2012. I am resending the plan for your review.

Thanks,
Matt

From: Webre, Matt
Sent: Friday, November 30, 2012 2:19 PM
To: 'VonGonten, Glenn, EMNRD'
Cc: Powell, Brandon, EMNRD; Potochnik, Mark; 'Ashley Ager'
Subject: RE: Dogie J-Vent Status Review

Glenn,

Attached is the revised work plan which includes the items you requested in your previous email. Williams is submitting this work plan to obtain temporary permission to discharge from OCD in accordance with 20.6.2.3106B NMAC. Williams would appreciate if you could conduct a review of the work plan at your earliest convenience.

Please contact me with any questions.

Thanks,

Matt Webre, P.G.
Environmental Specialist III
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(505) 632-4442 work
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(505) 632-4782 fax
matt.webre@williams.com

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Friday, November 09, 2012 3:21 PM
To: Webre, Matt
Cc: Powell, Brandon, EMNRD
Subject: RE: Dogie J-Vent Status Review

Matt,

As we discussed, OCD has the authority to approve the discharge of a chemical slurry as part of a remediation program. However, Williams must provide a detailed analysis of the slurry that it proposes to apply. The WQCC regulations (see 20.6.2.3101 NMAC et seq.) require operators to obtain a Discharge Permit from OCD if the discharged slurry contains any 3103 constituent present at concentrations greater than that listed in 3103. Depending on the details of the slurry application, OCD may consider this to be a discharge for which temporary permission may be granted under 20.6.2.3106B NMAC, or OCD may consider this to be a Class V UIC well.

To proceed further, Williams must provide OCD with the details of its proposed chemical slurry, including the information specified in 20.6.2.3106 NMAC. This will specifically include the volume and concentrations of all 3103 constituents.

Also, as we discussed, Williams should contact Brandon Powell to discuss the lined emergency pit that Williams installed.

Finally, I would appreciate a list of all Williams sites, including those that Williams is remediating pursuant to its OCD-approved general remediation plan.

Glenn von Gonten

Senior Hydrologist
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glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

From: Webre, Matt [<mailto:Matt.Webre@Williams.com>]
Sent: Friday, November 09, 2012 9:28 AM
To: VonGonten, Glenn, EMNRD
Subject: Dogie J-Vent Status Review

Glen,

Since we spoke a couple of weeks ago regarding the applications of the BOS 200 at the Dogie J-Vent site, I was wondering if you are at a decision point. On an operations side, we need to address the open excavation ASAP and would appreciate if you could let me know the status of when you might be able to provide a final decision.

Thanks,

Matt Webre, P.G.
Environmental Specialist III
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(505) 632-4442 work
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(505) 632-4782 fax
matt.webre@williams.com

VonGonten, Glenn, EMNRD

From: Reutlinger, Danny <Danny.Reutlinger@Williams.com>
Sent: Thursday, January 03, 2013 7:14 AM
To: VonGonten, Glenn, EMNRD
Cc: Webre, Matt
Subject: RE: Dogie J-Vent Status Review
Attachments: 2011annualGWreport-5-14-12.pdf

Glenn, you requested a list of sites that Williams is currently remediating. Attached is the 2011 Annual report that was submitted in early 2012.

From: Webre, Matt
Sent: Wednesday, November 14, 2012 1:44 PM
To: Reutlinger, Danny
Subject: FW: Dogie J-Vent Status Review

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Friday, November 09, 2012 3:21 PM
To: Webre, Matt
Cc: Powell, Brandon, EMNRD
Subject: RE: Dogie J-Vent Status Review

Matt,

As we discussed, OCD has the authority to approve the discharge of a chemical slurry as part of a remediation program. However, Williams must provide a detailed analysis of the slurry that it proposes to apply. The WQCC regulations (see 20.6.2.3101 NMAC et seq.) require operators to obtain a Discharge Permit from OCD if the discharged slurry contains any 3103 constituent present at concentrations greater than that listed in 3103. Depending on the details of the slurry application, OCD may consider this to be a discharge for which temporary permission may be granted under 20.6.2.3106B NMAC, or OCD may consider this to be a Class V UIC well.

To proceed further, Williams must provide OCD with the details of it proposed chemical slurry, including the information specified in 20.6.2.3106 NMAC. This will specifically include the volume and concentrations of all 3103 constituents.

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Finally, I would appreciate a list of all Williams sites, including those that Williams is remediating pursuant to its OCD-approved general remediation plan.

Glenn von Gonten
Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3488
Fax-476-3462

glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

From: Webre, Matt [<mailto:Matt.Webre@Williams.com>]
Sent: Friday, November 09, 2012 9:28 AM
To: VonGonten, Glenn, EMNRD
Subject: Dogie J-Vent Status Review

Glen,

Since we spoke a couple of weeks ago regarding the applications of the BOS 200 at the Dogie J-Vent site, I was wondering if you are at a decision point. On an operations side, we need to address the open excavation ASAP and would appreciate if you could let me know the status of when you might be able to provide a final decision.

Thanks,

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(505) 632-4782 fax
matt.webre@williams.com

VonGonten, Glenn, EMNRD

From: Webre, Matt <Matt.Webre@Williams.com>
Sent: Friday, November 30, 2012 2:19 PM
To: VonGonten, Glenn, EMNRD
Cc: Powell, Brandon, EMNRD; Potochnik, Mark; Ashley Ager
Subject: RE: Dogie J-Vent Status Review
Attachments: BOS Dogie Work Plan, 11-30-12.pdf

Glenn,

Attached is the revised work plan which includes the items you requested in your previous email. Williams is submitting this work plan to obtain temporary permission to discharge from OCD in accordance with 20.6.2.3106B NMAC. Williams would appreciate if you could conduct a review of the work plan at your earliest convenience.

Please contact me with any questions.

Thanks,

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From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Friday, November 09, 2012 3:21 PM
To: Webre, Matt
Cc: Powell, Brandon, EMNRD
Subject: RE: Dogie J-Vent Status Review

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Cc: Powell, Brandon, EMNRD
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Attachments: chemofBOS200.pdf; BOS 200 FLA.pdf

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VonGonten, Glenn, EMNRD

From: Brooks, David K., EMNRD
Sent: Monday, October 15, 2012 2:42 PM
To: VonGonten, Glenn, EMNRD
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

I saw it but have done no further research yet.

David

From: VonGonten, Glenn, EMNRD
Sent: Monday, October 15, 2012 1:16 PM
To: Brooks, David K., EMNRD
Cc: Sanchez, Daniel J., EMNRD
Subject: FW: Dogie J Vent - Work Plan for BOS 200 Amendment

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Sent: Monday, October 15, 2012 10:36 AM
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Cc: Powell, Brandon, EMNRD; Ashley Ager
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

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Sent: Wednesday, October 03, 2012 4:07 PM

To: VonGonten, Glenn, EMNRD
Cc: 'Powell, Brandon, EMNRD'; 'Ashley Ager'
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

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As you are aware, we would like to proceed with this treatment next week so please call with any questions.

Thanks,

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matt.webre@williams.com

From: Powell, Brandon, EMNRD [<mailto:Brandon.Powell@state.nm.us>]
Sent: Wednesday, October 03, 2012 10:19 AM
To: Webre, Matt
Cc: VonGonten, Glenn, EMNRD
Subject: FW: Dogie J Vent - Work Plan for BOS 200 Amendment

Matt-

In reference to your request for treatment with the amendment please see the response from Glen below. Glen's contact phone number is 505-476-3488 and his email is Glenn.VonGonten@state.nm.us if you have any questions.

Thank You
Brandon Powell
I & E Supervisor
New Mexico Oil Conservation
Office: (505) 334-6178 ext. 116

"He who wishes to gain knowledge is wiser than he who thinks he has knowledge (unknown)"

From: VonGonten, Glenn, EMNRD
Sent: Tuesday, October 02, 2012 4:29 PM
To: Powell, Brandon, EMNRD
Cc: Jones, Brad A., EMNRD; Sanchez, Daniel J., EMNRD
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Brandon,

Williams will need to supply OCD with some additional information, including MSDS for the amendment. Have you created a RP for this release. They will need to submit a Remediation Plan for GW monitoring.

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From: Powell, Brandon, EMNRD
Sent: Monday, October 01, 2012 2:34 PM
To: VonGonten, Glenn, EMNRD
Subject: FW: Dogie J Vent - Work Plan for BOS 200 Amendment

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Sent: Friday, September 28, 2012 9:02 AM
To: Powell, Brandon, EMNRD
Cc: Ashley Ager
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VonGonten, Glenn, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Monday, October 15, 2012 1:17 PM
To: 'Webre, Matt'
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Matt,

I have a call into legal, but OCD has not made a determination yet.

Glenn von Gonten

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Sent: Monday, October 15, 2012 10:36 AM
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Fax-476-3462
glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

From: Powell, Brandon, EMNRD
Sent: Monday, October 01, 2012 2:34 PM
To: VonGonten, Glenn, EMNRD
Subject: FW: Dogie J Vent - Work Plan for BOS 200 Amendment

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Thank You
Brandon Powell
I & E Supervisor
New Mexico Oil Conservation
Office: (505) 334-6178 ext. 116

"He who wishes to gain knowledge is wiser than he who thinks he has knowledge (unknown)"

From: Webre, Matt [<mailto:Matt.Webre@Williams.com>]
Sent: Friday, September 28, 2012 9:02 AM
To: Powell, Brandon, EMNRD
Cc: Ashley Ager
Subject: Dogie J Vent - Work Plan for BOS 200 Amendment

Brandon,

Attached is the work plan LTE prepared for the BOS 200 amendment at the former Dogie Compressor Station J Vent. Please provide you approval if possible by October 7, 2012.

Please call with any questions.

Thanks,

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(505) 632-4782 fax
matt.webre@williams.com

VonGonten, Glenn, EMNRD

From: Webre, Matt <Matt.Webre@Williams.com>
Sent: Monday, October 15, 2012 10:36 AM
To: VonGonten, Glenn, EMNRD
Cc: Powell, Brandon, EMNRD; Ashley Ager
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Glenn,

I was just following up again to find out if the NMOCd had made a decision in regards to our request. We have had equipment at the site for a month and would like to address this issue ASAP. Please let me know at your earliest convenience.

Thanks,
Matt

From: Webre, Matt
Sent: Wednesday, October 03, 2012 4:07 PM
To: VonGonten, Glenn, EMNRD
Cc: 'Powell, Brandon, EMNRD'; 'Ashley Ager'
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Glenn,

Attached is the MSDS for the BOS 200.

In regards to your question, the existing work plan should serve as the remediation plan for this site. The work plan proposes only one groundwater sampling event to confirm remediation of BTEX concentrations, which is appropriate with use of the BOS-200[®] amendment based on the relatively small size of contamination remaining. The benefits of using BOS-200[®] technology include a rapid treatment rate and lack of rebound because treatment occurs across a wide range of reductive processes. Upon application of BOS-200[®] directly to the contaminant, the bulk of the remediation is completed within days and enhanced degradation continues until all of the hydrocarbons are consumed. The remediation is designed to reduce concentrations of benzene in groundwater to less than 10 micrograms per liter (µg/L) immediately. Because BOS-200[®] actually consumes petroleum hydrocarbons both aerobically and anaerobically, no additional treatment is required and rebound is not a concern.

Williams would consider the proposed plan similar to leaving an excavation open, removing the groundwater present in the excavation, and then sample groundwater to evaluate concentrations. Since this remediation is designed to work immediately, any long-term monitoring would be redundant. The proposed groundwater sample will be collected from the source area (immediately below the former J-Vent location) after treatment, therefore the results will evaluate the location where the highest concentrations of contamination are present in groundwater. If the sample result exceeds the groundwater quality standards, Williams will initiate additional groundwater monitoring as required per NMOCd requirements.

A little more background on the product helps make this argument: BOS-200[®] is a carbon-based injectate inoculated with cultured microbes, electron acceptors and nutrients designed to biodegrade petroleum hydrocarbons. The primary treatment process is not to enhance indigenous bacteria, but to introduce a new biocosm within the subsurface. The new biocosm is activated carbon, which has enormous interstitial surface area and is coated with microbes. The microcosm offered by the carbon results in a robust environment that provides for effective breakdown of available

hydrocarbons. Natural biodegradation resulting from indigenous microbes located elsewhere in the groundwater is not considered a significant contributor to the cleanup.

Since the uptake of hydrocarbons by the BOS-200® carbon is relatively immediate (hours) upon contact and the interstitial biotreatment that follows is very efficient, the time of cleanup with this technology is short (days). Once installed, the BOS-200® carbon then serves as a catalyst in that the hydrocarbon concentration within the carbon matrix is substantially higher (due to a high adsorption capacity) than that which existed in the surrounding soil or groundwater prior to treatment. Rates of degradation are increased due to this concentration effect. As adsorbed contaminants are degraded, active sites within the carbon become available to adsorb fresh contaminant and the cycle is repeated. The cycle is sustained long-term in that the gypsum present in the BOS-200® formulation provides a continuous source of sulfate to support on-going biodegradation once anaerobic conditions prevail and sulfate reduction is the primary reductive process.

As you are aware, we would like to proceed with this treatment next week so please call with any questions.

Thanks,

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matt.webre@williams.com

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Sent: Wednesday, October 03, 2012 10:19 AM
To: Webre, Matt
Cc: VonGonten, Glenn, EMNRD
Subject: FW: Dogie J Vent - Work Plan for BOS 200 Amendment

Matt-

In reference to your request for treatment with the amendment please see the response from Glen below. Glen's contact phone number is 505-476-3488 and his email is Glenn.VonGonten@state.nm.us if you have any questions.

Thank You
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I & E Supervisor
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Office: (505) 334-6178 ext. 116

"He who wishes to gain knowledge is wiser than he who thinks he has knowledge (unknown)"

From: VonGonten, Glenn, EMNRD
Sent: Tuesday, October 02, 2012 4:29 PM
To: Powell, Brandon, EMNRD
Cc: Jones, Brad A., EMNRD; Sanchez, Daniel J., EMNRD
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Brandon,

Williams will need to supply OCD with some additional information, including MSDS for the amendment. Have you created a RP for this release. They will need to submit a Remediation Plan for GW monitoring.

Glenn von Gonten

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Attachments: MSDS-BOS200.pdf

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From: Powell, Brandon, EMNRD
Sent: Wednesday, October 03, 2012 10:14 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: Dogie J Vent - Work Plan for BOS 200 Amendment

Thank you I will let them know and have them get with you

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