

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

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Cabinet Secretary

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Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



04 August 2017

Zach Stradling
Benson-Montin-Greer Drilling Corp
4900 College Blvd
Farmington, NM 87401

Elizabeth McNally, P.E.
Animas Environmental Services, LLC
604 Piñon St.
Farmington, NM 87401

Re: 3RP# Site Name
 448 Hwy 537 Truck Receiving Station 2009 Release

Mr. Stradling and Ms. McNally:

OCD has reviewed Benson-Montin-Greer Drilling Corp (BMG) Remediation Plan Update for the above referenced release which was dated 31Jul17 and received 01Aug17.

We note that MW-1, after a period of declining BTEX values from 3/09 to 1/14, showed an unexplained appearance of NAPL on 4/14 which continues to be present. On 4/14, surrounding MWs showed non-detects for NAPL and BTEX. Only one adjacent MW-3 (60 ft SSE) has been tested since, showing eight non-detects, the most recent on 21Jun17. Except for MW-1 and MW-3, all nine other MWs on this site have shown compliance with WQCC standards for eight consecutive quarters, as of 2011 or 2014. NAPL thickness of 0.34 feet was measured in MW-1 in 21Jun17.

BMG reported about 3,839 pounds of petroleum hydrocarbons recovered between August 2014 and May 2015.

BMG proposed two pilot recovery studies for this August and September, one passive skimmer with hydrophobic filter system and another active skimmer with low vacuum enhanced skimmer system.

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OCD approves this Remediation Plan with the following conditions.

- 1) Do not P&A MW-3 and 5, cross gradient to the NAPL impacted MW-1.
- 2) Before 15Aug17, take groundwater samples from MW-2, MW-3, MW-4, MW-5. Have them tested for BTEX Method 8260.
- 3) Provide 72 hours prior notice of sampling to our District III environmental staff.
- 4) As per the Approved Work Plan, In the September 30, 2017 "Progress Report" please include BMG determination of the pilot project, Proposed Remediation Plan going forward, and reasonable time frames for initiation of the plan.

We look forward to your progress report to be submitted by 30Sep17.

Respectfully,



P.E., Hydrologist, District III



Environmental Specialist, District III

cc: Jim Griswold, Charlie Perrin, Brandon Powell, Cory Smith, Vanessa Fields, Robert Flegal