

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**Ken McQueen**  
Cabinet Secretary

**Matthias Sayer**  
Deputy Cabinet Secretary

**David R. Catanach, Division Director**  
Oil Conservation Division



15 June 2017

James McDaniel  
EH&S Supervisor  
XTO Energy  
382 Road 3100  
Aztec, NM 87410

**Subject: Work Plans Needed for 2017**

**Re:    3RP    Site Name**  
         **1035   Sullivan GC D#1E**  
         **106    Bruington GC #1**

Mr. McDaniel:

I have reviewed the six 2016 Annual Groundwater Monitoring Reports you submitted on 05Apr17. OCD comments on the two AGWMRs referenced above follow. At this time, we have no comments on the other 3RPs.

**RP-1035**        SVE recovered 15,000 lbs of TPH and 800 lbs BTEX in about 60 days of operation in 2016. NAPL thickness reduced in several wells. You've proposed four new monitoring wells but, even so, delineation of NAPL plumes have yet to be defined as follows. Recall the WQCC standard for NAPL is non-detect.

MW6	North, East, South	(0.33 ft NAPL)
MW1	South, Southwest	(0.19 ft NAPL)
MW2	East	(0.66 ft NAPL)

Your 2016 AGWMR indicates the preliminary SVE system will continue to operate so long as NAPL is reduced and vapor is present. Your OCD-approved Work Plan covered the 2016 monitoring and recovery operations. On or before 14Aug17, please submit a Work Plan for 2017 monitoring and recovery operations. Please include details on further delineation (see above) and specifics of SVE operations (timing, duration, notifications to District III staff, monitoring, equipment used, and so forth). OCD appreciates your aggressive and successful remediation work in 2016 and encourages the same for the future. Please keep us informed on negotiations with Western for access for more MWs.

**3RP-106**        Test results indicate source material is still in contact with ground water. Delineation of groundwater plumes of BTEX has yet to be defined as follows. Recall the WQCC standard for benzene is 10 ppb.

MW6	North	(21,300 ppb benzene)
MW7	North, South	(7,520 ppb benzene)
MW8	North, East, South	(15,300 ppb benzene)
MW2R	South	(14,000 ppb benzene)

We note a history of a) proposed remediation schemes, b) attempts to involve EPFS in investigation and cleanup efforts and c) attempts to elicit responses from OCD on proposals and assistance. This monitoring project has been going on since 1996 and the levels of benzene in the groundwater have remained about the same. We appreciate your long-standing efforts to get resolution on this project. Let's get together and start some movement. Meanwhile, be thinking about more MWs to fill the gaps above and about remediation strategies to a) find and remove any remaining source material, and b) to get the BTEX out of the groundwater.

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Once we have the strategies worked out, OCD will want you to a) submit a remediation plan approved by us (“us” meaning jointly by the District III staff and by the Santa Fe Environmental Bureau) pursuant to 19.15.29.11 NMAC, or b) submit an abatement plan proposal to the OCD director for approval pursuant to 19.15.30 NMAC.

In the recent past, OCD in District III has used option a) above to handle groundwater contamination cases. In the future, OCD will handle new District III groundwater cases using option b). In the transition mode, existing cases may be handled using either option, depending on circumstances and the histories of cases.

After you have reviewed this letter, give me a call (505-476-3084) and we can discuss details. Or if you’re in Aztec on my next trip (now scheduled 27-29Jun17), maybe we can talk face-to-face.

Respectfully,

A handwritten signature in blue ink that reads "Randy J. Griffin". The signature is written in a cursive, flowing style.

P.E., Hydrologist, District III

cc: Jim Griswold, Charlie Perrin, Brandon Powell, Cory Smith, Vanessa Fields, Jeff Blagg