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March 23, 2018

Randolph Bayliss, P.E.
NMOCD Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Progress Update to the Stage II Abatement Plan for the former Caribou Refinery in Kirtland, New Mexico

Mr. Bayliss,

This letter provides a progress update to the Stage II Abatement Plan for the Maverik Country Stores (Maverik) site (former Caribou Refinery) in Kirtland, New Mexico. As stated in the Stage II Abatement Plan, groundwater abatement will be considered successful and complete once the constituent concentrations found at the Site are below groundwater protection standards for eight consecutive quarters of groundwater sampling. Once the eight consecutive quarters of below groundwater protection standards have been met, Maverik will apply for official closure of the Site.

Maverik continues to abide by the goals outlined in the Stage II Abatement Plan. Groundwater results from the 2017 annual groundwater sampling were below New Mexico Groundwater Standards for all volatile organic compounds (VOCs) with the exception of injection well INJ-North, located within the slurry wall impoundment area. Groundwater sampled from INJ-North exceeded the New Mexico Groundwater Standards of 10 µg/L for benzene with a detected concentration of 58 µg/L. These results indicate the constituents of concern (COC) are confined within the slurry wall impoundment area. The 2017 groundwater sampling data suggest that the In Situ Chemical Oxidation (ISCO) injections were successful in decreasing the concentrations of VOCs within the slurry wall. Overall, the slurry wall impoundment is functioning as designed and no off-site migration of COCs is occurring.

Since 1998, groundwater sampling results indicate that impacts to groundwater at the site are limited to within the slurry wall impoundment area. Due to the robust dataset for the site demonstrating no impacts to groundwater downgradient of the slurry wall impoundment, Maverik proposes to discontinue sampling offsite and onsite monitoring wells outside of the slurry wall impoundment area (MW-10, MW-18, MW-19, MW-20, and MW-21). Maverik proposes to continue the annual groundwater sampling of the six monitoring wells inside the slurry wall area (INJ-N, INJ-E, INJ-S, INJ-W, MW-17, and MW-22) for the

2018 annual sampling event and into the future until the site can be closed. Maverik proposes to plug and abandon all eight offsite monitoring wells (MW-3, MW-5, MW-7, MW-8, MW-9, MW-14, MW-15, and MW-16). Wells will be plugged and abandoned in accordance with the State of New Mexico guidelines. The proposed change in the status of the wells is presented in **Figure 1**. In addition to sampling and gauging for fluid levels in the wells within the slurry wall impoundment, the remaining onsite monitoring wells (MW-10, MW-18, MW-19, MW-20, and MW-21) will be gauged for fluid levels annually.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Jayroe". The signature is stylized with a large, sweeping "J" and "Y".

Jason Jayroe
Project Manager

Attachments:

Figure 1 – Well Status Update

