

1R - 336

GENERAL CORRESPONDENCE

YEAR(S):

2004

Price, Wayne

From: Price, Wayne
Sent: Thursday, December 09, 2004 10:42 AM
To: Carolyn Doran Haynes (E-mail); Kristin Farris Pope (E-mail)
Cc: Randall Hicks (E-mail); Gil Van Deventer (E-mail)
Subject: Path Forward

Dear Ms. Haynes:

The OCD has logged every ROC site into our RBDM system. I will be sending you this comprehensive list. The list will have case numbers for all of our sites. I would like to see Kristin add those numbers to here spreadsheet if possible. I will be in the process of reviewing all of the closure sites (i.e. green sheet cover) and hope to send you approvals so we can close those sites out. I would also think it would be helpful if ROC would spell out on your spread sheet how each site was being closed. For example if one of the generic plans is or was used please note that, If not then signify type of closure, i.e. case-by-case, etc.

For disclosure sites, I am going to try to let ROC set the priority for these sites, however if we receive a complaint or in OCD's opinion it is a possible threat to public health then we may ask you to address that particular site.

I have already sent you my comments concerning the monument area up-gradient groundwater issue. The vadose zone and groundwater issues will have to be addressed. One thing we might do is set a lower priority on those sites and delay work until we have more data.

The other issue of concern for OCD is where disclosure sites had groundwater contamination and over a period of time this contamination has been reduced below the groundwater standards by dilution. OCD is very concerned that salt density gradient plumes are simply moving off site and thus could degrade down-gradient fresh water sources. OCD has a fiduciary duty to make sure this is not happening. Therefore, ROC will be expected to demonstrate this phenomenon is not happening. OCD will not accept models that demonstrate this unless monitor wells are installed to calibrate the model.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Price, Wayne

From: Price, Wayne
Sent: Wednesday, December 08, 2004 4:39 PM
To: Carolyn Doran Haynes (E-mail); Kristin Farris Pope (E-mail)
Cc: Gil Van Deventer (E-mail)
Subject: EME I-1 SWD Site Redwood Tank and Pit Closure

Dear Ms. Haynes:

The OCD is in receipt of the EME I-1 SWD redwood tank and pit closure (Partial report) dated November 05, 2004. The first sentence appears to be requesting a variance form the Generic Redwood Tank and Pit closure plan. Our records show OCD approved this generic plan on June 01, 1999. OCD does not have on record any other approvals past that date. Is this site still under one of the generic plans or do you want to modify the plan? Please clarify what your intentions are on this particular site.

The Trident report dated October 01, 2004 included in ROC's plan, mentioned above, does not clearly point out how this site will be remediated and closed. It appears it is a stand alone plan not to be associated with any generic plan previously approved. Therefore, OCD has the following concerns:

1. What TPH, BTEX and Chlorides levels will be used for delineation.
2. Please define most highly contaminated soils. What TPH and Chloride levels?
3. Please define Unimpacted overburden. What TPH, BTEX and Chloride levels?
4. What will be the levels of TPH, BTEX and Chlorides for backfill material. Will these materials be leachable?
5. If only one liner is installed and it is at the bottom, what will prevent infiltration from seeping through the backfill and simply running off to the side into groundwater?
6. The plan mentions the surface will be contoured, reseeded with native vegetation and monitored for growth, implying this procedure will eliminate any ponding and promote evapotranspiration, thereby minimizing natural infiltration. The plan does not provide any evidence this will work or a plan for future monitoring. OCD understands this year along there has been enormous rainfall in the Hobbs/Monument area. Is this accounted for?
7. Upon completion of activities, the plan mentions that closure samples will be collected. Please provide a more detail explanation.
8. Will the plan delineate to groundwater if necessary?

Please respond so OCD may properly evaluate this proposal.

Sincerely:

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