

1R - 483

REPORTS

DATE:

6-4-12

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June 4, 2012

Mr. Glenn Von Gonten
Environmental Bureau
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

MAR 14 2013

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**Re: Approval for Semi-Annual Monitoring and Closure Attainment Program,
NM OCD Remediation Project No. 1R-483, Elliott B-9 #1, 4, & 5 Tank
Battery, Unit C (NE/4, NW/4), Section 9, T22S, R37E, John H. Hendrix
Corporation, Lea County, New Mexico**

Dear Mr. Von Gonten:

Larson & Associates, Inc. (LAI), on behalf of John H. Hendrix Corporation (JHHC) requests one monitoring event at the Elliott B-9 #1, 4, and 5 Tank Battery (Site). Only monitoring well MW-1 will be sampled to confirm reduction of chloride and total dissolved solids to demonstrate constituent chemical stabilization. Remediation actions conducted thus far included soil excavation, liner installation, and revegetation of the former, closed production pit, as presented in the Remediation Report, No. 1R-483, submitted to the New Mexico Oil Conservation Division (NM OCD) on December 18, 2009, JHHC requests approval to monitor groundwater in well MW-1 on a semi-annual basis, followed by subsequent closure of the Site. A report of analytical data will be reported to NM OCD within 45 days after receipt and review of analysis from the laboratory semi-annually.

Specifically, the following remediation actions occurred at the Site:

- 2007 NM OCD approved soil remediation plan consisted of soil excavation and liner installation.
 - Two areas of concern where excavated to approximately seven feet.
 - A liner was installed at the bottom of the seven foot excavations.
 - Soil was also excavated to approximately three feet below ground surface west and south of the tank battery and filled with clean soil.

- Excavations were seeded with range grass.
- Three monitoring wells were installed in a linear configuration following the groundwater flow direction (Figure 3, Report No. 1R-483)
 - Groundwater monitoring displayed chloride and total dissolved solids in MW-1 exceeded New Mexico Water Quality Control Commission standards of 250 mg/L for chloride and 1,000 mg/L for total dissolved solids:
 - Chloride concentration in MW-1 was **1,710 mg/L** in October 2007 and was **720 mg/L** as of March 2012, resulting in a **56% reduction** as vadose zone waters react to the source removal and geotextile capping.
 - Total dissolved solids concentration was **3,300 mg/L** in October 2007 and was **1,860 mg/L** as of March 2012, resulting in a **47% reduction** as vadose zone waters react to the source removal and geotextile capping.

For your review, the updated analytical data table is enclosed with this letter, in addition to the 2009 Remediation Report No. 1R-483.

JHHC requests approval to semi-annually monitor MW-1 with subsequent closure upon evidence of further reduction of constituents to NMWQQS standards or stabilization of constituent concentrations. A response is respectfully requested. Please contact Jeremy Cannady (jeremy@laenvironmental.com) at 432.687.0901 to discuss steps for moving forward in remediation actions at the Site, thank you.

Sincerely,

Jeremy Cannady - LAI Staff Professional / Engineering

Enclosures

- 1) Analytical Data Table, B-9 #1, 4, and 5 Tank Battery Elliott, *Updated as of March 2012*
 - 2) 2009 Remediation Report Elliott B-9 #1, 4, and 5 Tank Battery, Report No. 1R-483
- c: Ms. Carolyn Haynes – JHHC Midland
Mr. Geoffrey Leking – NMOCD District 1

Table 2
 Water Quality Parameters Summary
 John H. Hendrix Corporation
 Elliott B-9 Tank Battery #1, #4 and #5 (1R0483)
 Unit C (NE/4,NW/4), Section 9, Township 22 South, Range 37 East
 Lea County, New Mexico

Water Quality	Collection Date	Alkalinity, Total	Chloride	Nitrate	Sulfate	Total Dissolved Solids
NMWQCC Standard (mg/L)		--	250	10	600	1000
MW-01	10/16/2007	215	1710	1.83	223	3,300
	4/8/2008	200	2070	--	214	3,980
	9/4/2008	320	936	--	141	2,240
	6/3/2009	278	660	--	130	1,840
	9/10/2009	--	650	--	--	1,660
	2/14/2011	--	587	--	--	1,480
	9/29/2011	--	739	--	--	1,730
	3/1/2012	--	720	--	--	1,860
MW-02	10/16/2007	204	57	--	88	542
	4/8/2008	240	61.7	--	87.2	535
	9/4/2008	260	33.3	--	68.1	438
	6/3/2009	288	56	--	79.0	492
	9/10/2009	--	52	--	--	478
	2/14/2011	--	46	--	--	546
	9/29/2011	--	50.9	--	--	950
	3/1/2012	--	55.0	--	--	521
MW-03	6/30/2009	--	188	--	--	875
	9/10/2009	--	188	--	--	889
	2/14/2011	--	168	--	--	1,030
	9/29/2011	--	221	--	--	1,040
	3/1/2012	--	220	--	--	920

Notes

Alkalinity analyzed via EPA Method 310.1.
 Anions analyzed via EPA Method 300.
 TDS analyzed via EPA Method 160.1. or via Method SM 2540C.
 All values reported in Milligrams per liter (mg/L, parts per million).
 < - Indicates the value is less than Method Detection Limit (MDL).



March 7, 2013

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Attn: Edward J. Hansen
Oil Conservation Division
1200 South St. Francis Dr
Santa Fe, NM 87505

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: NMOCD Project No. 1R483 and 1R484

Dear Edward J. Hansen:

As per your request via email I have attached the referenced documents for your review. I appreciate your quick response to this matter and look forward to discussing these projects. If you have any questions regarding this letter or the information enclosed, please contact me at (432) 687-0901.

Sincerely,

Larson & Associates, Inc.

A handwritten signature in cursive script that reads 'Jeremy Cannady'.

Jeremy Cannady
Staff Professional - Engineering
jeremy@laenvironmental.com

Enclosure (6)

Approval for Annual Monitoring and Closure Attainment Program, 1R-484
Approval for Annual Monitoring and Closure Attainment Program, 1R-483
Analytical Data Table, B-9 #1, 4 and 5
Analytical Data Table, B-9 #2 and 3
2009 Remediation Report, 1R-484
2009 Remediation Report, 1R-483

Jeremy J. Cannady

From: Hansen, Edward J., EMNRD [edwardj.hansen@state.nm.us]
Sent: Thursday, March 07, 2013 2:35 PM
To: Jeremy J. Cannady
Subject: RE: NMOCD Project No. 1R483 and 1R484

Dear Mr. Cannady,

Sorry, I was not able to locate any correspondence (since over a year ago) for either site.

Please send the below-reference documents to the OCD within 10 days. Thank you for your cooperation in this matter.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

From: Jeremy J. Cannady [mailto:jeremy@laenvironmental.com]
Sent: Thursday, March 07, 2013 1:19 PM
To: Hansen, Edward J., EMNRD
Subject: NMOCD Project No. 1R483 and 1R484

Good afternoon!

Mr. Hansen,

There was a document sent requesting closure for these two sites mentioned in the subject line last year. Can you give me an update as I have not heard what the status is. If you cannot locate the documents then I can redraft them and send them to you. I apologize for being late in my inquiry.

Thanks,

Jeremy J. C. Cannady

Professional Staff/Engineering
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507 N. Marienfeld, Suite 200
Midland, TX 79701
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Email: jeremy@laenvironmental.com