



AE Order Number Banner

Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



App Number: pTO1428752451

1RP - 3380

C&J WELL SERVICES, INC.

approved path forward
Geoffrey Leking
Environmental Specialist

Leking, Geoffrey R, EMNRD

From: Chan Patel <chan.patel@entechservice.com>
Sent: Thursday, April 17, 2014 4:00 PM
To: Leking, Geoffrey R, EMNRD
Cc: 'Teague, Les'
Subject: FW: Hobbs Reclamation Plant
Attachments: Figure 3 - Analytical Results and Area to be Excavated.pdf

NMOC-DIST1

4/23/14

HOBBS OCD

APR 17 2014

RECEIVED

Hi Mr. Leking

The purpose of this letter is to address your questions and concerns raised in your email to Darrell Moore dated October 30, 2013.

The format of this document is to present your comment in italics followed by our response.

1) *BH-4 is above the RRAL for TPH at the top of rock – the plan is to excavate until the RRAL is met.*

Response – True

2) *BH-1 & -2 are above the RRAL for TPH at the top of rock - the plan is to excavate until the RRAL is met*

Response – True

3) *The sidewall samples designated as SW are above the RRAL for TPH where indicated on the map and the trenches were excavated outwardly from these points until they displayed TPH levels below the RRAL – the plan is to excavate outward to where the trench samples displayed the TPH to be below the RRAL*

Response – True

4) *At what depth were the sidewall and trench samples collected – ie., are the bottoms of these locations also above/below the RRAL, respectively?*

Response – The sidewall from the base to the top of the excavation at the end of the trench were screened using an Organic Vapor Monitor (OVM) and visually observed for discoloration due to hydrocarbons. The sample location from the side wall represents a location where the OVM reading were the highest and /or where the most discoloration was observed.

5) *Is the unstipled area between BH-4 and the stipled area which begins at the pertinent sidewall samples a) below the RRAL for TPH? b) also to be excavated?*

Response – No. However, we can collect an additional sample from this area to demonstrate concentrations in the base of the excavation

6) *What about the unstipled area between BH-4 and the sidewalls that displayed TPH below the RRAL for TPH? Is this part of the excavation considered to be below the RRAL for TPH?*

Response – True. No further excavation is planned in this area.

7) *Even though we discussed the possibility of the caprock to be considered an adequate barrier for downward migration...with the ground water depicted to be so shallow on our trend map here at OCD...if the TPH cannot be excavated to below the RRAL, then I would like to see a liner (either synthetic or clay) emplaced at the site.*

Response – Additional samples will be collected after excavation around BH-4 and in the unstipled area. Based on the results of these samples a plan to address any residual TPH will be presented. With

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respect to a clay cap, as the depth of the excavation is only 1-2 feet deep, if a clay cap is installed it could only be a 1-2 feet thick.

I hope this letter addresses your questions and concerns. If you could please approve our path forward we would like to excavate as presented in the attached Figure 3, collect additional samples in the current base of the excavated area (unstriped area) and collect confirmation samples in the excavated area (green striped area).

We are confident that this approach will remove any risk to the environment and satisfy NMOCD's concerns. If you have any questions, please feel free to contact me at (713) 201-5704 or at my email chan.patel@entechservice.com.

We look forward to your response and approval of our path forward.

Chan Patel
EnTech Consulting Corporation
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From: Darrell Moore [mailto:darrell.moore@entechservice.com]
Sent: Wednesday, April 2, 2014 1:55 PM
To: 'Chan Patel'
Subject: FW: Hobbs Reclamation Plant

From: Leking, Geoffrey R, EMNRD [mailto:GeoffreyR.Leking@state.nm.us]
Sent: Wednesday, April 2, 2014 11:41 AM
To: Darrell Moore
Subject: RE: Hobbs Reclamation Plant

Darrell

Please review my comments below for accuracy and respond – These are from my review of the submittals of 08/15/13 and 12/18/13/

- 1) BH-4 is above the RRAL for TPH at the top of rock – the plan is to excavate until the RRAL is met
- 2) BH-1 & -2 are above the RRAL for TPH at the top of rock - the plan is to excavate until the RRAL is met

- 3) The sidewall samples designated as SW are above the RRAL for TPH where indicated on the map and the trenches were excavated outwardly from these points until they displayed TPH levels below the RRAL – the plan is to excavate outward to where the trench samples displayed the TPH to be below the RRAL
- 4) At what depth were the sidewall and trench samples collected – ie., are the bottoms of these locations also above/below the RRAL, respectively?
- 5) Is the unstipled area between BH-4 and the stipled area which begins at the pertinent sidewall samples a) below the RRAL for TPH? b) also to be excavated?
- 6) What about the unstipled area between BH-4 and the sidewalls that displayed TPH below the RRAL for TPH? Is this part of the excavation considered to be below the RRAL for TPH?
- 7) Even though we discussed the possibility of the caprock to be considered an adequate barrier for downward migration...with the ground water depicted to be so shallow on our trend map here at OCD...if the TPH cannot be excavated to below the RRAL, then I would like to see a liner (either synthetic or clay) emplaced at the site.

I think we are really close to getting this site closed. I am fine with having a meeting, but maybe I can still approve a path forward before that is needed.

Look forward to your response. Thank you.

Geoffrey Leking
Environmental Specialist
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From: Darrell Moore [<mailto:darrell.moore@entechservice.com>]
Sent: Tuesday, April 01, 2014 12:28 PM
To: Leking, Geoffrey R, EMNRD
Subject: Hobbs Reclamation Plant

Geoff

We haven't heard anything from you on this release since we submitted comments to your latest request in December 2013. We started this remediation in May 2012 and have sent several revisions and done several phases of work that OCD requested. We really need to get this finalized! We will come to Hobbs and meet with you on this issue next week which is April 7-11. Just give us one of those days that you will be available. We have had an open hole on this location for almost 2 years now. This is a safety issue and an operational issue for this facility. We have got to move this forward!

I look forward to hearing from you with a time we can meet in Hobbs at OCD's offices.

Darrell Moore
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Regional Project Manager
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