

State of New Mexico
Energy, Minerals and Natural Resources Department

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25 May 2017

J. Brady Crouch, Program Manager
Risk Management & Remediation
ConocoPhillips
EC3-06-W056
600 N. Dairy Ashford
Houston, TX 77079

Re: 3RP-468 State Com J6 2016 Annual Ground Water Monitoring Report (AGWMR)

Dear Mr. Crouch

I've reviewed the results and recommendations in your 2016 AGWMR. Your mobile dual phase extraction (MDPE) work in August and November 2014 and April 2015 removed 588 gallons of condensate (NAPL) from the ground water. Your AGWMR describes this as "very productive" and we agree. The depth of NAPL appears to diminish following these events but seems to return after several months. Sometimes, this might indicate a source of condensate in the soil that continues to supply NAPL in the ground water.

However, the delineation of the NAPL plume has yet to be defined. The extent of the plume beyond your four recovery wells (RW) has not been found in any of the cardinal directions. RW-1 was "dry" in December 2016.

I notice your consultant is taking field duplicates for quality control purposes. We appreciate this attention to detail.

In 2016 AGWMR, paragraph 3 cites a work plan for locations of new MWs. I can't find a copy of that in our files, so could you please email me a copy?

By 30 June 2017, please submit work plans to a) delineate both the NAPL and benzene plumes and b) to continue to recover NAPL effectively by use of active mechanical extraction methods. Thank you for your work so far.

Randolph Bayliss, P.E.
Hydrologist, District III

Cc: Jim Griswold, Charlie Perrin, Brandon Powell, Cory Smith, Vanessa Fields