

1R - 433

**GENERAL
CORRESPONDENCE**

YEAR(S):

2005

Price, Wayne

From: Price, Wayne
Sent: Friday, May 06, 2005 2:42 PM
To: 'Randall Hicks'; Price, Wayne; Martin, Ed
Cc: 'Kristin Farris Pope'; Sheeley, Paul; Patrick B. McMahon (E-mail); Martin, Ed; Mike Griffin (E-mail)
Subject: RE: Lovington Abo

Hi Randy, the city of Lovington has supplied OCD with soil surface samples that show high chlorides (11,000-22,000 mg/kg). Unless I missed something we did not see levels listed that high in your reports. So, I have requested the District office to go out and collect samples early next week. If you want to split call Paul Sheeley (OCD). Once I get our sample results then our technical staff will determine a path forward hopefully that be satisfactory to all parties and will protect the environment. OCD considers this a high profile case since it is located in close proximity to the Lovington City fresh water well field. OCD is concerned about the amount of time that has passed with no remedial action. OCD will make a decision very soon.

Starting Last week OCD Environmental Bureau was instructed by our Bureau Chief that no files may leave the office but can be copied in our office for \$.25 per copy.

I quickly reviewed the data base and did not find any Devon Projects near Buckeye. I do have two Devon projects 1R0432 and 1R0433 which included some analysis using the Hydrus 1D. These projects were both amended by the contractor and basically turned out to be very large excavation projects which are still in progress. Both may have groundwater contamination and reports are due in July 05. If they do have groundwater contamination then most likely they will be subject to Rule 19.

-----Original Message-----

From: Randall Hicks [mailto:R@rthicksconsult.com]
Sent: Friday, May 06, 2005 1:23 PM
To: 'Price, Wayne'; emartin@state.nm.us
Cc: 'Kristin Farris Pope'
Subject: Lovington Abo

Wayne

Here is what I understand you need for your evaluation of the Lovington Abo 1G spill site:

1. An photo or digital image of the original spill
2. Results of any surface soil analyses
3. A spill report – which I believe Kristin faxed to you.

If there is anything else we can do, let us know.

As discussed earlier today, I would like a copy of the NMOCD file for the site that Jan Hendrickx told me that he performed some modeling. Jan suggested that it was a Devon site near Buckeye – a CD Dickerson site or something like that?

By this email I am alerting **Kinko** of Santa Fe to call Wayne Price at 476-3487 to schedule a time for the file pick-up. In your absence, I am asking KINKOs to call Ed Martin at NMOCD to retrieve the file.

Thanks

Randy Hicks
505-266-5004 - office

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Price, Wayne

From: Price, Wayne
Sent: Friday, March 11, 2005 8:54 AM
To: 'Mike Griffin'; Price, Wayne
Cc: chris.biagi@dvn.com; Sheeley, Paul
Subject: RE: Devon Patsy Site 1R0433

Dear Mike:

OCD has a Rule 13 (General Operations/Waste Prohibited) and Rule 710 concerning this matter. Prohibit wasting oil and placing produced water onto the surface of the ground. There are exceptions and this is in a grey area, but OCD would like to see any oil and oil water recovered to be recycled. Therefore your request is hereby denied.

Rule 19 (Prevention and Abatement of Water Pollution) and Rule 116 requires notification of groundwater contamination. OCD considers your phone call and this E-mail as proper notification. Rule 19 allows OCD to grant an operator an exemption from an Abatement plan requirement. Pursuant to our telephone conversation OCD hereby grants this exemption at this time.

OCD recommends that you use your trash pump to pump the water and oily emulsions up to a small staging tank where the vacuum truck can haul it to a proper disposal.

If you choose this method then please maintain all disposal records. After the water meets WQCC standards or when all practical free product has been removed then Devon may submit a request for closure with a monitoring plan if necessary. The excavated hole shall not be filled back in until OCD approves. Devon may continue performing any necessary remedial actions for safety and environmental reasons.

On all future correspondence please reference 1R0433.

-----Original Message-----

From: Mike Griffin [mailto:whearth@msn.com]
Sent: Thursday, March 10, 2005 10:56 AM
To: wprice@state.nm.us
Cc: chris.biagi@dvn.com; psheeley@state.nm.us
Subject:

Good Morning Wayne:

Attached, please find a photo of our excavation at the Devon Patsy Site southeast of Monument. As you may recall the site has three distinct point sources. The first is a spread zone situated immediately south of a pit. The contamination within this area is rather topical extending to a maximum depth of 8' below ground surface.

The second area is the main battery. We've not yet begun excavation of the battery but previous borings indicate that the contamination extends from the surface to the groundwater.

The third area is the pit, itself. We initially excavated the pit to a depth just above the table (located at 32' bgs) and found TPH concentrations to be over 7,000 ppm consisting largely of aromatic fractions. We then excavated below the groundwater surface to a total depth of approximately 38' bgs and allowed the hole to fill with water. As you will see from the attached photo, the free product consists of less than 1% of the total fluid volume.

We would like to take a trash pump and send this water to our mix pile where it will be subsequently mixed and blended with already excavated soils to a maximum concentration of <500 ppm. Though we would prefer to simply pump out the water and send it to commercial disposal, it would require us to spend at least two days constructing a ramp for the water truck to reach a depth where the vacuum pressure within the truck exceeds the hydrostatic weight of the fluid column we hope to remove, (maximum 15').

3/11/2005

Our trash pump will move several hundred gallons per hour and we will berm the discharge end of the hose to insure that it doesn't simply run off onto the surface. We will continue to pump this water until we no longer have any floating product atop the table.

Thank you in advance for your consideration of this protocol revision.

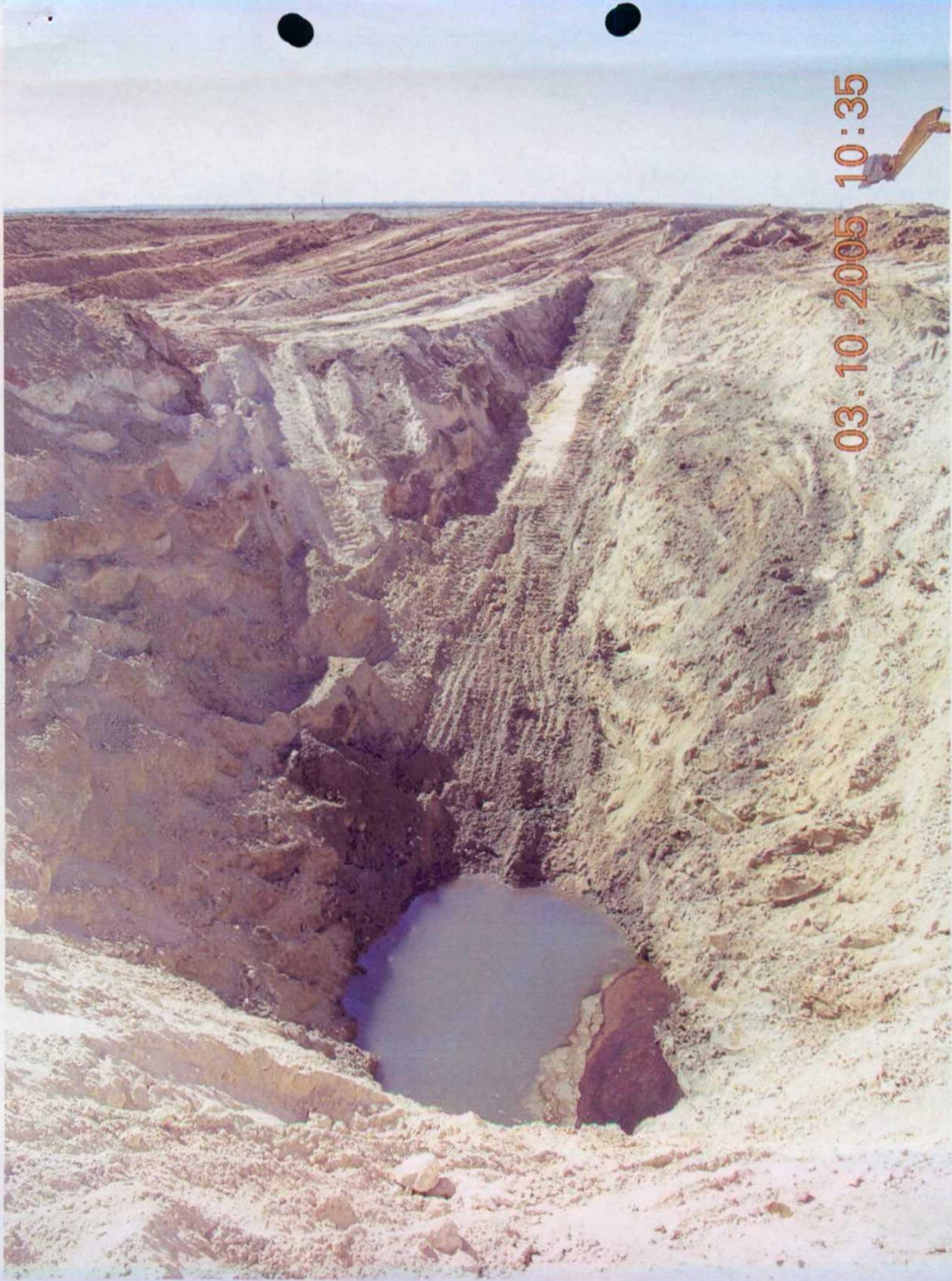
Mike Griffin

Whole Earth Environmental, Inc.

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03.10.2005 10:35