

From: Bratcher, Mike, EMNRD
To: ["Crissy Forrest"](#)
Cc: [Patterson, Heather, EMNRD](#); [Gayle Kirkland](#); [Casey Snow \(csnow@matadorresources.com\)](#); [Jim Amos \(jamos@blm.gov\)](#); [Billings, Bradford, EMNRD](#)
Subject: RE: Salt Draw No. 1
Date: Wednesday, July 01, 2015 9:15:00 AM

Crissy,

Thanks. OCD will approve work to commence as outlined in the proposal, with removal of material from the legacy pit. This portion of the project will be at the direction of BLM. The proposed 4' of material may be excavated from the area identified on your site map as being the area impacted by the release (which includes the bermed battery area). This material may be placed for bioremediation as outlined in the proposal, however, OCD is going to require a more robust sampling/delineation program subsequent to the 4' excavation, than what has been proposed. OCD notes that the C-141 and the proposal, both indicate that the 252 bbl crude oil release was all contained in the bermed battery area. 71 bbls were recovered, which leaves a net loss of 181 bbls of crude oil. OCD can only speculate that this volume of crude may have migrated downward through the vadose zone above the shallow ground water aquifer, with this migration being inside of the bermed battery area. It is also noted that Matador excavated 420 cu/yds of material in August 2013. It is unclear where this excavation was located. The current sampling program does not include any sample data taken from the bermed battery area. The closest sample points to the battery are at the south end, outside the battery, and are labeled as GB7, GB8, and GB9. These samples were all taken during the 2013 sample event. GB8 and GB9 both show TPH levels greater than 6000 mg/kg at 16' bgs. There is no data above or below the 16' interval. GB9 shows TPH levels at 4' bgs to be 3390 mg/kg. The data from these sample points is inconclusive in determining the extent of hydrocarbon impact closest to the battery area, and again, no data from the battery area at all. Per OCD guidelines, target remediation goal for hydrocarbon impact at this site is 100 mg/kg. OCD also notes that the release occurred in July, 2013. The initial sampling event was performed approximately one month after the release. The second sampling event was performed in November 2014, more than a year after the release, and the remediation proposal was submitted in June 2015, almost two years after the release event. It should also be noted that the area in which the Matador is situated, experienced a major flood event in September, 2014.

Please advise once excavation activities have been scheduled, and, prior to obtaining any other samples from the site.

OCD site identification: Matador Production Co. * Salt Draw 11 Fed Com 1 * 30-015-23692 * G-11-25s-28e * Eddy County

OCD reference number: **2RP-1791** * Date of release discovery: 7/31/13

Please reference the 2RP number in future correspondence. OCD approval is required prior to backfilling any excavations, and prior to final disposition of materials in any bioremediation cell.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of

responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notification, please contact me.

Mike Bratcher
NMOCD District 2
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From: Crissy Forrest [mailto:forrest@sphere3env.com]
Sent: Tuesday, June 30, 2015 5:07 PM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; Gayle Kirkland; Casey Snow (csnow@matadorresources.com)
Subject: Re: Salt Draw No. 1

Mike,

Yes, it is my understanding that the tanks have already been removed from the area.

Crissy

Sent from my iPhone

On Jun 30, 2015, at 5:42 PM, Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us> wrote:

Crissy,

The status of your June 2, 2015 submittal is "under review". I do have some questions and concerns about this release site and proposal, so it may take a little more time to address them. A question I have at this point is the following:

- Does Matador intend on removing the tanks to facilitate excavation of the bermed battery area?

Mike Bratcher
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From: Crissy Forrest [<mailto:forrest@sphere3env.com>]
Sent: Tuesday, June 30, 2015 1:26 PM

To: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD
Cc: Gayle Kirkland; Casey Snow (csnow@matadorresources.com)
Subject: Salt Draw No. 1

Mike,

Could you please let us know the status is of the work plan submitted on June 2 for the remediation activities at the Salt Draw No. 1 location? Matador is ready to begin the work on the site.

If you have any concerns or questions please let me know!

Thank you!

Crissy Forrest

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