Bratcher, Mike, EMNRD

From: Sheldon Hitchcock <slhitchcock@talonlpe.com>
Sent: Tuesday, May 23, 2017 11:56 AM
To: Bratcher, Mike, EMNRD; 'stucker (stucker@blm.gov)'
Cc: Weaver, Crystal, EMNRD; Shoemaker, Mike; David Adkins
Subject: Devon Energy: Ore Ida 14 Fed #10 |30-015-29290|2RP-4123 & 2RP-3222|
Attachments: Ore Ida 14 Fed #10 Site Map.pdf; Ore Ida Groundwater.pdf

Mike & Shelly,

The Ore Ida 14 Fed #10 currently has two open RP's. 2RP-3222 from August 21, 2015. This release was a from a tank overflow into the lined battery. They lost approximately 85bbls and recovered 60bbls. The second open RP is 2RP-4123 this release was the result of a lightning strike which occurred on February 13, 2017. Approximately 123bbls of PW were lost as a result of this release, 120bbls were recovered. At this point I have the impacted area on the location horizontally delineated and vertically delineated to below RRAL's at all but one sample location (data table below and site plan attached). I am still waiting on data from our delineation to 250 mg/kg. I will follow up with that data when I receive it. Soil sampling was not possible in the battery due to the infrastructure (tanks, utilities, liner, etc.). However due to the lightning strike the tank battery is going to be rebuilt. Obviously coordinating the remediation, battery construction, and limiting down time present some logistical issues. Therefore I would like to propose the following in order to expedite the process.

Ground water is approximately 150-feet below ground surface (BGS)

1. The impacted area on the location in the vicinity of sample location S-1 will be excavated to a depth of 1-foot, S-2 will be excavated to a depth of 2-feet, and S-3 will be excavated to a depth of 4-feet. A liner will be installed at the bottom of the S-3 excavation in order to encapsulate the remaining chloride impacts.

2. Once the tanks and other equipment are removed from the battery area we will mobilize a backhoe to the location and collect soil samples within this area. Vertical delineation for chlorides will be conducted until the target concentration of 250 mg/kg is achieved or we reach the maximum depth possible with the backhoe. Should chloride impacts be above the NMOCD remediation guideline of 1,000 mg/kg at a depth greater than 4-feet BGS we will excavate the battery area to a depth of 4-feet BGS and install a liner to encapsulate the remaining chloride impacts.

As usual we will pad the liner(s) to protect from puncture and backfill with caliche. Please let me know what your thoughts are on this proposal.

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	<0.300	1440	<10.0	24.2
S-1	1	--	976	--	--
S-1	2	--	1070	--	--
S-1	3	--	656	--	--
S-1	4	--	512	--	--
S-1	5	--	368	--	--
S-2	0	<0.300	14000	<10.0	<10.0
S-2	1	--	2320	--	--
S-2	2	--	992	--	--
S-2	3	--	816	--	--

S-2	4	--	1040	--	--
S-2	5	--	864	--	--
S-3	0	<0.300	16000	<10.0	<10.0
S-3	1	--	2960	--	--
S-3	2	--	5200	--	--
S-3	3	--	4800	--	--
S-3	4	--	4000	--	--
S-3	5	--	2840	--	--
S-4	0	--	160	--	--
S-5	0	--	160	--	--
S-6	0	--	32	--	--

Respectfully,

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