Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD

Sent: Tuesday, August 15, 2017 10:35 AM

To: 'Geoff Leking'; stucker@blm.gov; 'Brad Grandstaff'
Cc: fred@etechenv.com; Weaver, Crystal, EMNRD

Subject: RE: Chisolm Neptune 31 Federal #1 - 2RP-4239 Corrective Action Plan

RE: Chisholm Energy * Neptune 31 Fed 1 * 2RP-4239 * DOR: 5/26/17

Geoff,

Your proposal for remediation of the above referenced release is <u>not</u> approved at this time. The plan proposes to excavate to an unspecified depth, stockpile on plastic, and then bioremediate impacted soils in one foot lifts in the excavated area. The plan indicates that after the first "one foot lift" is complete, another will be placed. Based on the analytical data provided, the bulk of the impact appears to be within the top 12" of soil. I am not clear on how deep you plan to excavate, nor how there would be multiple lifts based on the data. There has also not been any samples taken on the well pad. OCD will require a complete delineation, to include impact on the pad and around the well head.

Please copy Crystal Weaver (OCD District 2) on future correspondence.

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

Mike Bratcher NMOCD District 2 811 South First Street Artesia NM 88210 575-748-1283 Ext 108

From: Geoff Leking [mailto:geoff@etechenv.com]

Sent: Tuesday, August 1, 2017 2:14 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; stucker@blm.gov

Cc: fred@etechenv.com

Subject: Chisolm Neptune 31 Federal #1 - 2RP-4239 Corrective Action Plan

Mike and Shelly

Etech Environmental and Safety Solutions, Inc. is pleased to submit to you the Corrective Action Plan for the Chisolm Neptune 31 Federal #1 - 2RP-4239 release. Please contact me with any questions or concerns. Thank you.

Geoff Leking

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