

**From:** John Farrell  
**To:** [Bratcher, Mike, EMNRD](#)  
**Cc:** "[Ruth, Amy](#)"; [Weaver, Crystal, EMNRD](#); [agroves@slo.state.nm.us](mailto:agroves@slo.state.nm.us); "[Jody Walters](#)"; "[Robbie Runnels](#)"  
**Subject:** Corrective Action Plan for JRU 29 SWD  
**Date:** Friday, December 15, 2017 11:41:42 AM  
**Attachments:** [JRU 29 SWD CAP - final doc. 12.15.17.pdf](#)

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Dear Mr. Bratcher:

Attached, please find the Corrective Action Plan (CAP) for the XTO JRU 29 SWD facility in Eddy County, New Mexico.

To review, during our meeting on October 4, 2017, Basin Environmental/XTO stated the JRU 29 SWD CAP was preliminary and that it would be updated; that a regional Groundwater Trend Map would be used to determine depth to groundwater at the site; that there will be further delineation of chlorides at Test Trenches 4 and 7 using excavation equipment; and, in pasture areas impacted by the spills, Basin will remove a previously existing liner and place a new liner using methods described in the CAP.

Per NMOCD request, as part of the CAP, Basin has placed data from field and laboratory testing into a Microsoft Xcel<sup>®</sup> Spreadsheet to facilitate ease of review. Please note that Basin used the 600mg/kg chloride level discussed at the meeting as the benchmark indicating that cleanup has been achieved.

CAP SUMMARY: the CAP proposes some additional delineation of chlorides at two of the test trench points, soil removal to a depth of approximately 4 feet and placement of a liner over the area of contamination in pasture areas and grading to local contours. The plan also calls for removal of 1 foot of caliche on the chloride impacted pad area followed by replacement with un-impacted caliche and compaction to complete the remedial process. Currently, excavation of impacted soil and installation of liners is the best available technology to further prevent migration of contaminants downwards towards the water table.

Please review the attached CAP and provide any comments to Amy Ruth of XTO with copies to Jody Walters, Robbie Runnels and John Farrell of Basin Environmental Service Technologies.

Sincerely,

John P. Farrell P.G.  
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