From: Weaver, Crystal, EMNRD

To: "Lucas Middleton"; Bratcher, Mike, EMNRD
Cc: John Hurt; Csnow (Csnow@matadorresources.com)

Subject: RE: SOIL REMEDIATION WORK PLAN FOR THE INCIDENT AT THE ANNE COM 202H RELEASE EDDY COUNTY

NEW MEXICO, 2RP-4515

Date: Monday, April 2, 2018 9:45:00 AM

Attachments: <u>image002.png</u>

RE: Matador * Anne COM RB 202H * 30-015-44417 * 2RP-4515

Greetings,

This project is not approved as written. The portion of this report titled "4.0 Soil Remediation Workplan" makes no sense. It says excavation will continue to be guided by composite sampling of chlorides using filed screens yet the next sentence says the entire spill area will be excavated to depth of 1ft bgs as shown in Figure 2. There is no showing or indication of depth of excavation in Fig. 2. Also delineation is not complete for chlorides using laboratory confirmation samples at Source, L-1, L-2, or L-4. Results have to show that at each sample point 600ppm or less was reached for chlorides and confirmation of that value has to be provided via laboratory analysis. If the delineation is not done then how would the depth of excavation be determinable?

Also one sample point was checked for TPH and BTEX (the source location) none of the others were

Also one sample point was checked for TPH and BTEX (the source location) none of the others were ran according to the data entries in the provided data table.

Amount of sample points need to be representative of the spill plume area, i.e. additional sample points are required for this release area size.

Please read over the COA document attached to the Initial C-141 form that was sent back form OCD to Matador for this release on 1/11/18.

It states:

"Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C6 thru C36), and for chloride by Method 300." - Laboratory Method 4500 is being accepted for chloride sample testing but preferably not during the confirmation sampling phase.

"Composite sampling is not generally allowed."

"Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation."

If there are an questions, comments or concerns please contact either myself or Mike Bratcher here at the OCD District II Office.

Thank you,

Crystal Weaver

Environmental Specialist OCD – Artesia District II 811 S. 1st Street Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963 Fax: 575-748-9720

From: Lucas Middleton [mailto:lucas.middleton@soudermiller.com]

Sent: Monday, January 29, 2018 11:10 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD

<Crystal.Weaver@state.nm.us>

Cc: John Hurt < JHurt@matadorresources.com>

Subject: SOIL REMEDIATION WORK PLAN FOR THE INCIDENT AT THE ANNE COM 202H RELEASE

EDDY COUNTY NEW MEXICO, 2RP-4515

Good Morning,

On behalf of Matador Resources, SMA is submitting a work plan for a Anne COM #202H . 2RP-4515

Thank you and have a great day

Lucas Middleton Staff Scientist (575) 499-9244 (mobile)



Souder, Miller & Associates
Engineering Environmental Surveying
201 S. Halagueno
Carlsbad, NM 88220
www.soudermiller.com

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