

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 8, 2018 10:35 AM
To: 'Randall Hicks'; Weaver, Crystal, EMNRD; 'Tucker, Shelly'
Cc: 'CARIE STOKER'
Subject: RE: Remnant Oil - NSLU #3 2RP - 3333

All,

In addition to the last email, OCD notes that this site has two other open RPs in addition to 2RP-3333. They are:

- **2RP-3243** * DOR: 8/17/2015 * Net loss 175 bbls PW
- **2RP-3447** * DOR: 12/5/2015 * Net loss 18 bbls PW

Please advise intent for addressing these other two releases not later than 5/22/2018

Thank you,

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

From: Bratcher, Mike, EMNRD
Sent: Tuesday, May 8, 2018 10:25 AM
To: 'Randall Hicks' <r@rthicksconsult.com>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>
Cc: 'CARIE STOKER' <carie@stokeroilfield.com>
Subject: RE: Remnant Oil - NSLU #3 2RP - 3333

RE: Remnant Oil * NSLU 3 Injection Line * **2RP-3333** * 30-315-20183 * DOR: 10/12/15

Mr. Hicks,

Remedial goal for the top 4' of material is **600 mg/kg chloride**, or background levels at like depth. The areas identified from the 11/2/17 sample date as, S2 (near AH1) and S3 (near AH2), do not meet this criteria. Since this project has been ongoing for almost 3 years, natural attenuation is not working in a time frame that is acceptable for closure of releases. At this time, OCD requests the areas identified be excavated. The top two feet of material may be stockpiled for reuse (confirmation samples of stockpiles required), with the next two feet (total 4' bgs) excavated and removed to disposal or an alternative means of remediation to less than 600 mg/kg be proposed. Time frame will be 30 days only. This project must be satisfactorily completed not later than June 15, 2018.

Your proposal as presented, is **not** approved.

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

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.

From: Randall Hicks <r@rthicksconsult.com>
Sent: Monday, May 7, 2018 4:39 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>
Cc: 'CARIE STOKER' <carie@stokeroilfield.com>
Subject: FW: Remnant Oil - NSLU #3 2RP - 3333

Hi all

We submitted this in January and it we would like to get it seeded before any monsoon may occur.

Are we good to go?

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004

From: Randall Hicks [<mailto:r@rthicksconsult.com>]
Sent: Thursday, January 11, 2018 3:04 PM
To: 'Mike Bratcher'; 'Tucker, Shelly' (stucker@blm.gov)
Cc: 'CARIE STOKER'
Subject: Remnant Oil - NSLU #3 2RP - 3333

Mr. Bratcher and Ms. Tucker

The data demonstrate that

1. the upper 3-feet of dune sand in the footprint of the release will support vegetation
2. Natural flushing has caused the salt mass to migrate below the root zone
3. Groundwater is sufficiently deep that natural dispersion eliminates any potential that this release will impair groundwater quality.

Take a look and see what you think. The operator would like to seed the site when conditions are best.

Please call me with questions.

Randall Hicks
R.T. Hicks Consultants
Cell: 505-238-9515
Office: 505-266-5004