

Bratcher, Mike, EMNRD

From: Ronald Herrygers <rherrygers@windstream.net>
Sent: Wednesday, November 28, 2018 8:30 AM
To: Billings, Bradford, EMNRD
Cc: Bratcher, Mike, EMNRD; 'John Kennedy'
Subject: FW: [EXT] RE: New Rule Links 2RP-4730

Brad:

If you could call me today, I have a few questions pertaining to performing the remediation in compliance with the new rule.

As I mentioned, other circumstances are requiring that we begin excavation on-site tomorrow.

Thank you.

Ronald F. Herrygers, P.G.
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From: Ronald Herrygers [mailto:rherrygers@windstream.net]
Sent: Tuesday, November 27, 2018 8:00 PM
To: 'Pruett, Maria, EMNRD' <Maria.Pruett@state.nm.us>
Cc: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; 'bradford.billings@state.nm.us' <bradford.billings@state.nm.us>; 'John Kennedy' <jkennedy@entech-us.com>
Subject: RE: [EXT] RE: New Rule Links 2RP-4730

Maria:

A few weeks ago, when we were on-site collecting soil samples at depth from 28 different locations, to better assess the chloride concentrations for our excavation purposes, we were originally considering installing 2-3 groundwater monitoring wells on-site (in close proximity to the brine impacted soil area) to determine the exact depth of groundwater at our site, but when we obtained the State Engineer's well information (and all of its wells were deeper than 50 feet), then this plan was shelved.

I'm not sure how close the 2 USGS wells are to the spill area, but data from groundwater monitoring wells located at the edge of this spill area would certainly give us a more accurate determination of the true depth to groundwater in the spill affected zone. The rule seems to suggest that measuring the actual depth of groundwater at the spill location would be the first choice for determination of the depth to groundwater on-site, but if this information is not obtained, then secondary information (such as information from wells in the vicinity), would be used.

Please confirm that this would be considered a reasonable approach to identify the true depth of groundwater at the spill site, in accordance with the rule?

Also, please confirm Brad's phone number.

Thank you.

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From: Pruett, Maria, EMNRD [<mailto:Maria.Pruett@state.nm.us>]
Sent: Tuesday, November 27, 2018 7:48 PM
To: Ronald Herrygers <rherrygers@windstream.net>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'John Kennedy' <jkennedy@entech-us.com>
Subject: RE: [EXT] RE: New Rule Links 2RP-4730

Hello Mr. Herrygers,

Here is the data. Does the site currently monitor ground water? There are wells in the area that are less than 50' and the area also has karst that is of concern, so the closure criteria will be to the most protective Table 1 which was stated below and in the rule.

Best Regards,

Maria Pruett

Environmental Specialist
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District 2
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From: Ronald Herrygers <rherrygers@windstream.net>
Sent: Tuesday, November 27, 2018 5:36 PM
To: Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; 'John Kennedy' <jkennedy@entech-us.com>
Subject: [EXT] RE: New Rule Links 2RP-4730

Maria:

Please forward me a copy of the 2 USGS wells that show a depth less than 50 feet deep.

I also wanted to ask.....if I'm reading this new rule correctly, if we measured the depth to groundwater through monitoring wells on-site and identified from 2-3 monitoring wells that the depth to groundwater in all 3 of those wells was below 50 feet, it would seem that this would change the Closure Criteria that we would use at the site. Is this your understanding too?

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From: Pruett, Maria, EMNRD [<mailto:Maria.Pruett@state.nm.us>]
Sent: Tuesday, November 27, 2018 7:10 PM
To: rherrygers@windstream.net
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: New Rule Links 2RP-4730

Hello Mr. Herrygers,

Thank you for speaking with me this afternoon. Below are links to the Revised Spill Rule and updated C-141 forms. The area around 2RP-4730 has medium karst as well as 2 USGS wells that show depth to ground water to be less than 50', therefore the spill should be remediated to the most protective standard that includes: Chlorides < 600 mg/kg and TPH < 100 mg/kg, these numbers will be found in Table 1 in the revised rule. Please also note that final samples must include all 4 constituents and any spill off pad should have the top 4' be of non-waste containing, uncontaminated material so those samples should be at non-detect or the same as a background sample.

Moving forward the point of contact for this spill will be Mr. Brad Billings, cc'd above. Please let me know if you have any questions or need further assistance.

Revised Rule: <http://www.emnrd.state.nm.us/OCD/documents/NaturalResourcesWildlifeOilandGasReleases.pdf>
Updated C-141: <http://www.emnrd.state.nm.us/OCD/forms.html>

Best Regards,

Maria Pruett

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