

## **Hamlet, Robert, EMNRD**

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**From:** Hamlet, Robert, EMNRD  
**Sent:** Tuesday, July 23, 2019 9:24 AM  
**To:** 'Andresen, Rebecca'  
**Cc:** Venegas, Victoria, EMNRD; Bratcher, Mike, EMNRD; 'Jason Michelson'  
**Subject:** RE: Candelario 24-1 SWD Battery, 2RP-4201

Rebecca,

We received the Sample Summary and Site Map that SMA put together, thank you. After looking at the NM OCD Environmental Map, the depth to groundwater in this area appears to be very shallow (20-30'). The soil investigation indicated that the chloride impacts extend to between 5 and 14 feet deep. Contaminated soil was excavated and removed to a depth of 4 feet below ground surface, thank you. We can give you a 12 month extension if the wells will be plugged and addressed by then.

After the well has been plugged and abandoned, delineation sampling will need to continue. Sidewall samples SW2, SW3, SW5 through SW10 were above the limit, meaning the sidewall excavations will need to be extended until they are under the 600 mg/kg chloride limit. Additionally, the first clean sample on B1 was at 9 feet and B2 at 24 feet. It might be in your interest to drill an additional borehole at each location. SMA used such large increments in between samples (Surface, 14 ft, 24ft) that its very difficult to see at what depth the contaminants end. The OCD suggests smaller sample increments of maybe two feet, so you will know exactly what depth to excavate to. Chlorides will need to be excavated until contaminants are below the 600 mg/kg chloride limit, which will require extensive excavation.

If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 55' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, sample points would be allowed for deferral.

Please, let me know if you decide to drill a borehole or have any questions.

Thank you,

Robert J Hamlet  
State of New Mexico  
Energy, Minerals, and Natural Resources  
Oil Conservation Division  
811 S. First St., Artesia NM 88210  
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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 groundwater, 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, or local laws and/or regulations.

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**From:** Andresen, Rebecca <Rebecca.Andresen@arcadis.com>  
**Sent:** Thursday, June 13, 2019 2:39 PM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>  
**Cc:** Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Jason Michelson' <JMichelson@chevron.com>  
**Subject:** [EXT] Candelario 24-1 SWD Battery, 2RP-4201

Mr. Hamlet,

Please find attached a Site Deferral Letter regarding NMOCD Case No. 2RP-4201. A release at this location was reported to the NMOCD in May 2017. A report documenting initial cleanup activities was submitted to the NMOCD in September 2018. Chevron acquired the lease for this well in October 2018 and is planning to plug and abandon the well. We are respectfully requesting a review and determination of the September 2018 report, and deferral of additional investigation activities until the facility is decommissioned.

Please let us know if you have questions.

Best Regards,

**Rebecca Andresen, P.G.** | Vice President | [rebecca.andresen@arcadis.com](mailto:rebecca.andresen@arcadis.com)  
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