

From: [Yu, Olivia, EMNRD](#)
To: ["Donald, Patricia"; "Tucker, Shelly"](#)
Cc: [Williams, Luke](#)
Subject: RE: EMSU B Satellite #13
Date: Thursday, April 26, 2018 9:41:00 AM
Attachments: reviewed_1RP4545_EMSU B Sat 13 Submitted FINAL C-141.pdf

Ms. Donald:

NMOCD does not accept the final C-141 for 1RP-4545 for the following reasons:

1. Due the timespan between release date (January 4, 2017) and date (November 9, 2017) and estimated depth to groundwater at 32 ft. bgs in 1996 (USGS), the data presented are insufficient for release characterization.
2. What is the rationale for 1 ft. of data for SB-1, presumed to be in the vicinity of the release point?
3. All sample locations only have surface tested for BTEX and TPH extended. Please be advised that at least one more foot of data in depth is required for verification that Benzene, BTEX, and TPH extended plumes are fully characterized.
4. There are no horizontal delineation data.

Please be advised that for complete release characterization with groundwater at < 50 ft. bgs, laboratory analyses must demonstrate at least 5 feet within permissible levels for chlorides: depth obtained 600 mg/kg and depth maintained 5 ft. further. Edges of the impacted area and must be tested for chlorides in addition to BTEX, TPH extended, and chlorides. All laboratory analyses must have corresponding field data.

In the subsequent report, please include 1) an appropriately scaled map with the release point and delineation sample locations demarcated with the same sample ID as laboratory results; 2) tabulated laboratory and field data and GPS coordinates for sample locations; 3) dated and georeferenced photo documentation of release area and delineation activities.

BLM may have additional stipulations or conditions.

Thanks,
Olivia

From: McDaniel, James <James_McDaniel@xtoenergy.com>
Sent: Thursday, December 21, 2017 8:56 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Williams, Luke <Luke_Williams@xtoenergy.com>
Subject: EMSU B Satellite #13

James McDaniel
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Wednesday, December 20, 2017 1:02 PM
To: McDaniel, James
Cc: Williams, Luke
Subject: electronic copies of reports

Mr. McDaniel:

For the reports dropped off at the NMOCD-Hobbs office today, please submit them in electronic format as well. I do not work with paper copies.

Thanks,

Olivia Yu
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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 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.