

From: [Bratcher, Mike, EMNRD](#)
To: [Zack Thomas](#)
Cc: [Griswold, Jim, EMNRD](#); [Pruett, Maria, EMNRD](#)
Subject: RE: Queen 23 24 Water Transfer Line 2RP-4712
Date: Thursday, September 27, 2018 9:33:43 AM
Attachments: [image001.png](#)
[image002.png](#)

Zack,

This site will have to be closed per current rule.

If you have any questions, contact me, Jim or Maria.

Thanks,

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

From: Zack Thomas <zthomas@mewbourne.com>
Sent: Tuesday, September 18, 2018 8:46 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: Queen 23 24 Water Transfer Line 2RP-4712

Mike

Any word on this? It's got me stressed out to the max lol

I looked at all the water well data from OSE in all 6 sections surrounding the site and the average depth to groundwater is over 50 feet. I know that under the new rule, due to it being within 200 ft of a playa, we must treat it like ground water is less than 50 ft but if you guys can cut me some slack on this I would be forever in your debt. Now in my defense I did submit the characterization report/work plan on 7-3-18 and believe I got a verbal approval from Mike before the August 14 deadline. Granted the plan was to use RxSoil's (in-situ) method, not dig & haul, but when I got all the bids in RxSoil was too expensive.

Please let me know as soon as you can if I'm going to have to be the bearer of bad news to my bosses on how much this thing is going to cost if we have to dig everything out to 600 ppm. I had Austin (SMA), Jim I know you love him lol, grab some background samples out there here recently and should have the results sent to me today.



Zack Thomas

Environmental Rep.
Mewbourne Oil Company
[PO Box 5270](#)
Hobbs, NM 88241 US

Phone: (575) 393-5905 | Fax: (575) 397-6252
(575) 602-2188
Email: zthomas@Mewbourne.com



From: [Zack Thomas](#)
To: [Bratcher, Mike, EMNRD](#)
Cc: [Griswold, Jim, EMNRD](#); [Pruett, Maria, EMNRD](#)
Subject: [EXT] RE: 2RP-4712 & 2RP-4730
Date: Thursday, November 1, 2018 10:04:25 AM
Attachments: [image001.png](#)
[image002.png](#)
[\(3\) 2RP-4712 & 2RP-4730 Background Sample Locations & Results.pdf](#)

Mike,

This should be in the correct format in order for you all to see exactly where our hotspots are located and also how hot they actually are. I built this packet not meant as a remediation plan but as a info packet showing you that there are natural chlorides in the area and whenever it rains, it mostly likely drains straight into Willow Lake. That is why I believe all sample points taken are relevant to the release and should be taken into account. All I'm trying to accomplish is getting approval to only have to clean-up to already natural occurring chloride levels. Please get back to me asap. thanks



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From: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>
Sent: Monday, October 15, 2018 10:03 AM
To: Zack Thomas <zthomas@mewbourne.com>
Cc: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>
Subject: RE: 2RP-4712 & 2RP-4730

Zack

Proposals need to come in PDF formats, scaled diagrams depicting sample points with analytical data in table formats. We cant do anything with this the way it is sent.

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Subject: [EXT] 2RP-4712 & 2RP-4730

Good Morning Gentleman,

2rp-4712 is the incident in willow lake that we've been discussing, and 4730 is just to the East of it off Pulley Road.

We collected 7 background samples from the area around these two leaks. I've attached the KMZ files and the lab data for said backgrounds. BG5 (3000 ppm) & BG6 (1000 ppm) tested positive for elevated chlorides. With this in mind, do we have grounds to request that we only need to clean up to these background levels?



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Sample Point	Depth	Chloride Levels
BG1	0.5'	28000
BG1	1'	ND
BG2	0.5'	ND
BG2	1'	ND
BG3	Surface	ND
BG3	0.5'	ND
BG3	1'	ND
BG4	0.5'	ND
BG5	1	3000
BG6	1	1000
BG7	1	ND

Analytical Report

Lab Order: 1809B70

Date Reported:

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Souder, Miller & Associates
Project: Queenie BGs

Lab Order: 1809B70**Lab ID:** 1809B70-001**Collection Date:** 9/18/2018 9:00:00 AM**Client Sample ID:** BG1-0.5'**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **SRM**

Chloride	28000	30	E	mg/Kg	20	9/20/2018 4:52:14 PM
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Lab ID: 1809B70-002**Collection Date:** 9/18/2018 9:12:00 AM**Client Sample ID:** BG1-1'**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **SRM**

Chloride	ND	30		mg/Kg	20	9/20/2018 5:29:27 PM
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Lab ID: 1809B70-003**Collection Date:** 9/18/2018 9:30:00 AM**Client Sample ID:** BG2-0.5'**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **SRM**

Chloride	ND	30		mg/Kg	20	9/20/2018 5:41:51 PM
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Lab ID: 1809B70-004**Collection Date:** 9/18/2018 9:46:00 AM**Client Sample ID:** BG2-1'**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **MRA**

Chloride	ND	30		mg/Kg	20	9/20/2018 6:55:48 PM
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Lab ID: 1809B70-005**Collection Date:** 9/18/2018 10:00:00 AM**Client Sample ID:** BG3a**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **MRA**

Chloride	ND	30		mg/Kg	20	9/20/2018 7:33:01 PM
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Lab ID: 1809B70-006**Collection Date:** 9/18/2018 10:15:00 AM**Client Sample ID:** BG3b**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
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EPA METHOD 300.0: ANIONSAnalyst: **MRA**

Chloride	ND	30		mg/Kg	20	9/20/2018 7:45:26 PM
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Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit

- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 1 of 0

Analytical Report

Lab Order: 1809B70

Date Reported:

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Souder, Miller & Associates
Project: Queenie BGs

Lab Order: 1809B70**Lab ID:** 1809B70-007**Collection Date:** 9/18/2018 10:25:00 AM**Client Sample ID:** BG3-1**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	ND	30		mg/Kg	20	9/20/2018 8:22:40 PM

Analyst: MRA

Lab ID: 1809B70-008**Collection Date:** 9/18/2018 11:00:00 AM**Client Sample ID:** BG4**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	ND	30		mg/Kg	20	9/20/2018 8:35:06 PM

Analyst: MRA

Lab ID: 1809B70-009**Collection Date:** 9/18/2018 11:45:00 AM**Client Sample ID:** BG5**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	3000	30	E	mg/Kg	20	9/20/2018 8:47:30 PM

Analyst: MRA

Lab ID: 1809B70-010**Collection Date:** 9/18/2018 1:00:00 PM**Client Sample ID:** BG6-1**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	1000	30		mg/Kg	20	9/20/2018 8:59:55 PM

Analyst: MRA

Lab ID: 1809B70-011**Collection Date:** 9/18/2018 1:47:00 PM**Client Sample ID:** BG7**Matrix:** SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 300.0: ANIONS						
Chloride	ND	30		mg/Kg	20	9/20/2018 9:12:20 PM

Analyst: MRA

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank	
	D Sample Diluted Due to Matrix	E Value above quantitation range	
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits	Page 2 of 0
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range	
	PQL Practical Quantitative Limit	RL Reporting Detection Limit	

6/25/2018

nmwrrs.ose.state.nm.us/ReportProxy?queryData=%7B"report"%3A"waterColumn"%2C%0A"BasinDiv"%3A"true"%2C%0A"Basin"%3A""



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,
O=orphaned,
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q	Q	Q	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column
<u>C 04025 POD1</u>		CUB	ED	4	3	3	27	24S	28E	586700	3560964	190	90	100

Average Depth to Water: **90 feet**

Minimum Depth: **90 feet**

Maximum Depth: **90 feet**

Record Count: 1

PLSS Search:

Section(s): 27

Township: 24S

Range: 28E

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

6/25/18 8:33 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

6/25/2018

nmwrrs.ose.state.nm.us/ReportProxy?queryData=%7B"report"%3A"waterColumn"%2C%0A"BasinDiv"%3A"true"%2C%0A"Basin"%3A""...



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(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	DepthWell	DepthWater	Water Column
C 03358 POD1		CUB	ED	1	4	1	26	24S	28E	588416	3562116	135		
C 03423		CUB	ED	2	4	1	26	24S	28E	588786	3561952	126		
C 03833 POD1		C	ED	2	1	2	26	24S	28E	589014	3562545	96	55	41
C 04151 POD1		CUB	ED	4	2	1	26	24S	28E	588584	3562192	280	65	215
C 04180 POD1		CUB	ED	2	1	2	26	24S	28E	589055	3562502	160	58	102
C 04181 POD1		CUB	ED	3	2	1	26	24S	28E	588450	3562146	280	56	224

Average Depth to Water: **58 feet**

Minimum Depth: **55 feet**

Maximum Depth: **65 feet**

Record Count: 6

PLSS Search:

Section(s): 26, 23

Township: 24S

Range: 28E

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6/25/18 4:33 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER

From: [Bratcher, Mike, EMNRD](#)
To: [Zack Thomas](#)
Cc: [Griswold, Jim, EMNRD](#); [Pruett, Maria, EMNRD](#)
Subject: RE: 2RP-4712 & 2RP-4730
Date: Thursday, November 1, 2018 11:04:16 AM
Attachments: [image001.png](#)
[image002.png](#)

Zack,

You need to go ahead and submit remediation proposals, individually, for each release. I can save you some time by telling you that 28,000 is not going to be accepted as a background level, even in this area. OCD will review proposals, closures, etc. as they come in, pursuant to 19.15.29, so please submit a complete packet for each release.

Thanks,

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

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District II
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District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 385958

CONDITIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 385958
	Action Type: [IM-SD] Incident File Support Doc (ENV) (IM-BNF)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Historical document upload.	9/23/2024