NM1 - ___8_____

GENERAL CORRESPONDENCE

YEAR(S):

2013

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division

October 1, 2013

Craig Schmitz
T-n-T Environmental, Inc.
HCR 74 Box 113
Lindrith, New Mexico 87029

RE: High Chloride Soil Identification, Isolation, and Removal Plan
T-n-T Environmental, Inc.
Permit NM1-008 (Evaporation Ponds and Landfarm)
Location: SE/4 of Section 7 and SW/4 of Section 8 (evaporation ponds) and the SW/4 SE/4 and SE/4 NW/4 of Section 5 and NE/4 NW/4 of 8 (landfarm), Township 25 North, Range 3 West, NMPM, Rio Arriba County, New Mexico

Dear Mr. Schmitz:

The Oil Conservation Division (OCD) has reviewed T-n-T Environmental, Inc.'s (T-n-T) request, dated September 12, 2013 and received by OCD via email on September 23, 2013, to grant approval of a plan to identify, isolate, and removal of high chloride (greater than 1000 mg/kg) soils within the treatment zone of Cells 4, 6, 7, and 11 at the OCD permitted landfarm (Surface Waste Management Facility Permit NM-1-008). OCD hereby approves the plan with the following conditions:

1. In the last protocol, 6B, the continued assessment of the treatment zone (soils under remediation) shall cease when the vadose zone (native soils) is encountered.
    a. Any soils in the treatment zone identified to have a chloride concentration exceeding 1000 mg/kg shall be contained, excavated, and removed as described in Protocols 6 and 6A of the plan.

2. If any soils in the treatment zone identified having a chloride concentration exceeding 1000 mg/kg are discovered placed above the vadose zone, T-n-T shall sample the vadose zone to determine if a release has occurred.

3. In accordance with Permit NM1-008, T-n-T shall only accept new soils for remediation in the Cells 1 and 2.
    a. T-n-T shall cease accepting new soils for remediation in all other landfarm cells that existing outside of the permitted boundary.
    b. T-n-T shall continue to disk the soils and perform vadose zone monitoring of the landfarm cells that existing outside of the permitted boundary.
    c. T-n-T shall continue to comply with the permit conditions of NM1-008 and the transitional provisions of Section 20 of 19.15.36 NMAC for Cells 1 and 2.

Please be advised that approval of this request does not relieve T-n-T of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve T-n-T of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Brad A. Jones
Environmental Engineer

BAJ/baj

Cc: OCD District III Office, Aztec

Jones, Brad A., EMNRD

From:	tony Schmitz <schmitzent@yahoo.com>
Sent:	Monday, September 23, 2013 2:48 PM
To:	Jones, Brad A., EMNRD
Cc:	Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD
Subject:	Chloride testing program
Attachments:	Chloride testing program.pdf

Gentlemen
Attached is the program for approval.

Thanks
Craig Schmitz
T-N-T Environmental Inc.
HCR 74 Box 113
Lindrith NM, 87029
Cell # 505-320-2130
Office # 575-774-6504
Have a Blessed Day

T-n-T Environmental, Inc.
HCR 74 Box 113
Lindrith, NM 87029

September,12 2013

Attn: Charlie Perrin
Brandon Powell
OCD
1220 South St. Francis Drive
Santa Fe, N M 87505

RE: Proposal for chloride sampling for cells #4,6,7,&11

1. T-n-T Environmental is submitting this letter for approval of the following procedure for Identifying, isolating and removal of high chloride soil for cells #4, 6, 7&11. Each sample Will be a 5 point composite sample and lab sampled using test method SM 4500 CI-B.

2. Attached is the measured and gridded diagrams of cells #4, 6, 7&11.

3. Step #1
   A. Each cell will be gridded into sub cells named A through H.
      (For example see diagram #1 pages 1 through 4)
   B. Each sub cell will be sampled and lab tested.
   C. Any high chlorides identified in any sub cell will then be subject to step #2

4. Step #2
   A. Each sub cell will be gridded into quarter sub cells named 1 through 4.
      (For example see diagram #2)
   B. Each Quarter sub cell will be sampled and lab tested.
   C. Any high chlorides identified in any Quarter sub cell will then be subject to step #3

5. Step #3
   A. This breakdown procedure would continue until we have isolated all areas of high chlorides.

6. All high chloride areas identified will be contained by berming the areas.
   A. upon approval T-n-T Environmental will excavate the top eight inches of soil in identified areas and transported by belly dump to WCA Bondad Landfill.
   B. upon completion of excavation the area previously high in chlorides will then be sampled and lab tested to verify that the remaining soil test below 1000ppm.chlorides.

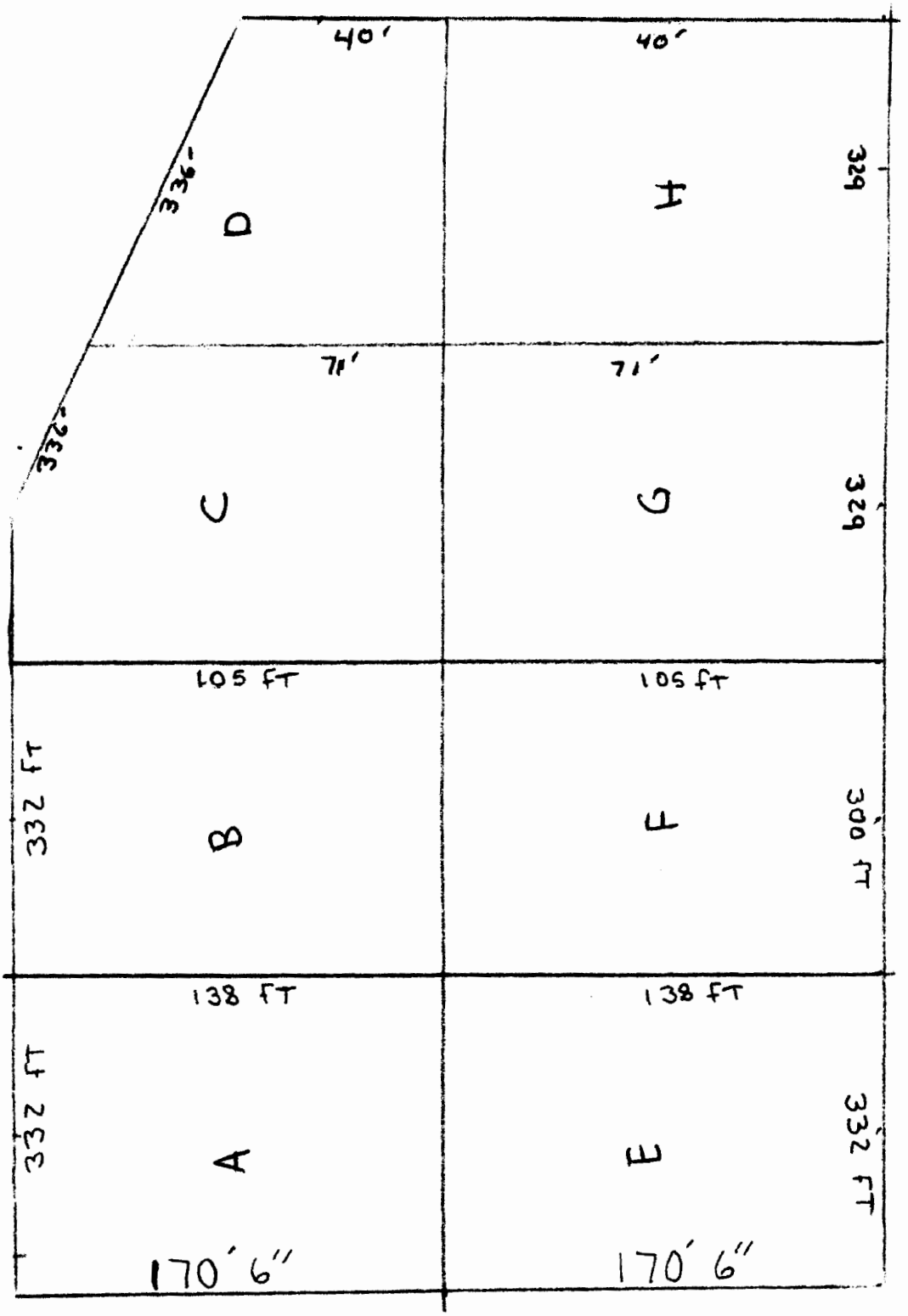
Sincerely,

Craig Schmitz
Tony Schmitz

CELL 4

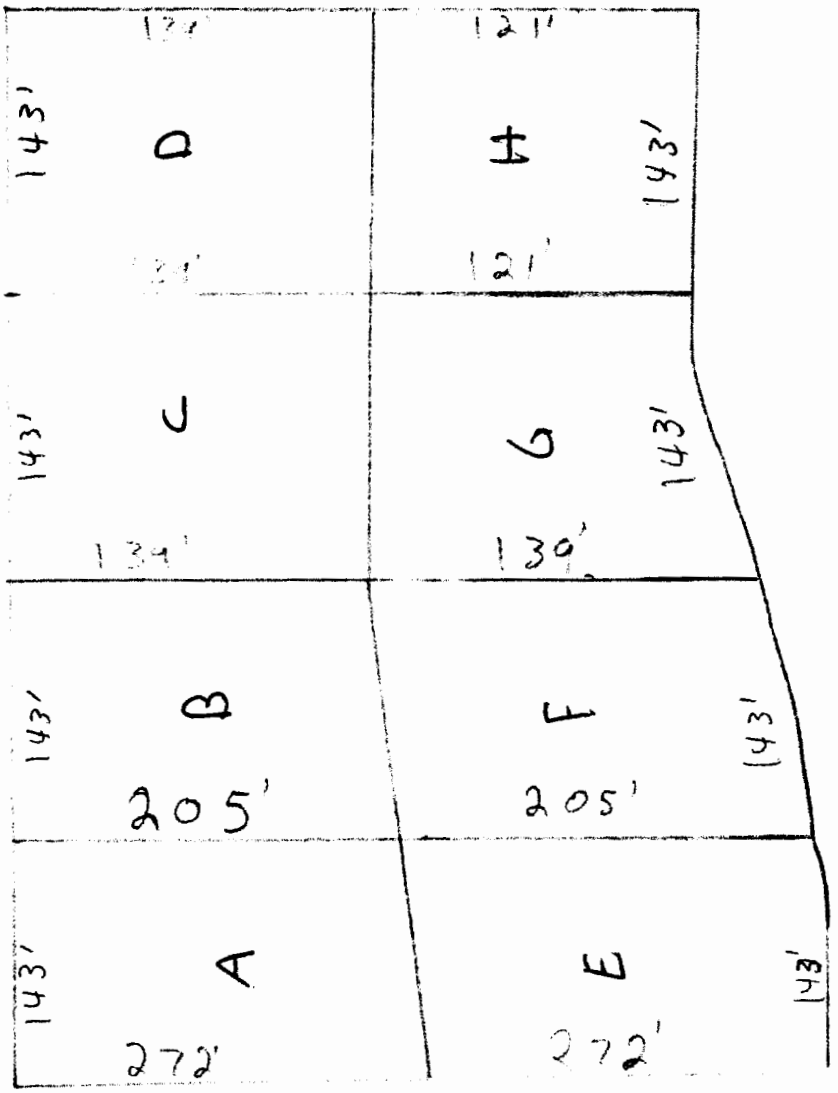
N

DIAGRAM #1 PAGE #1



CELL #6

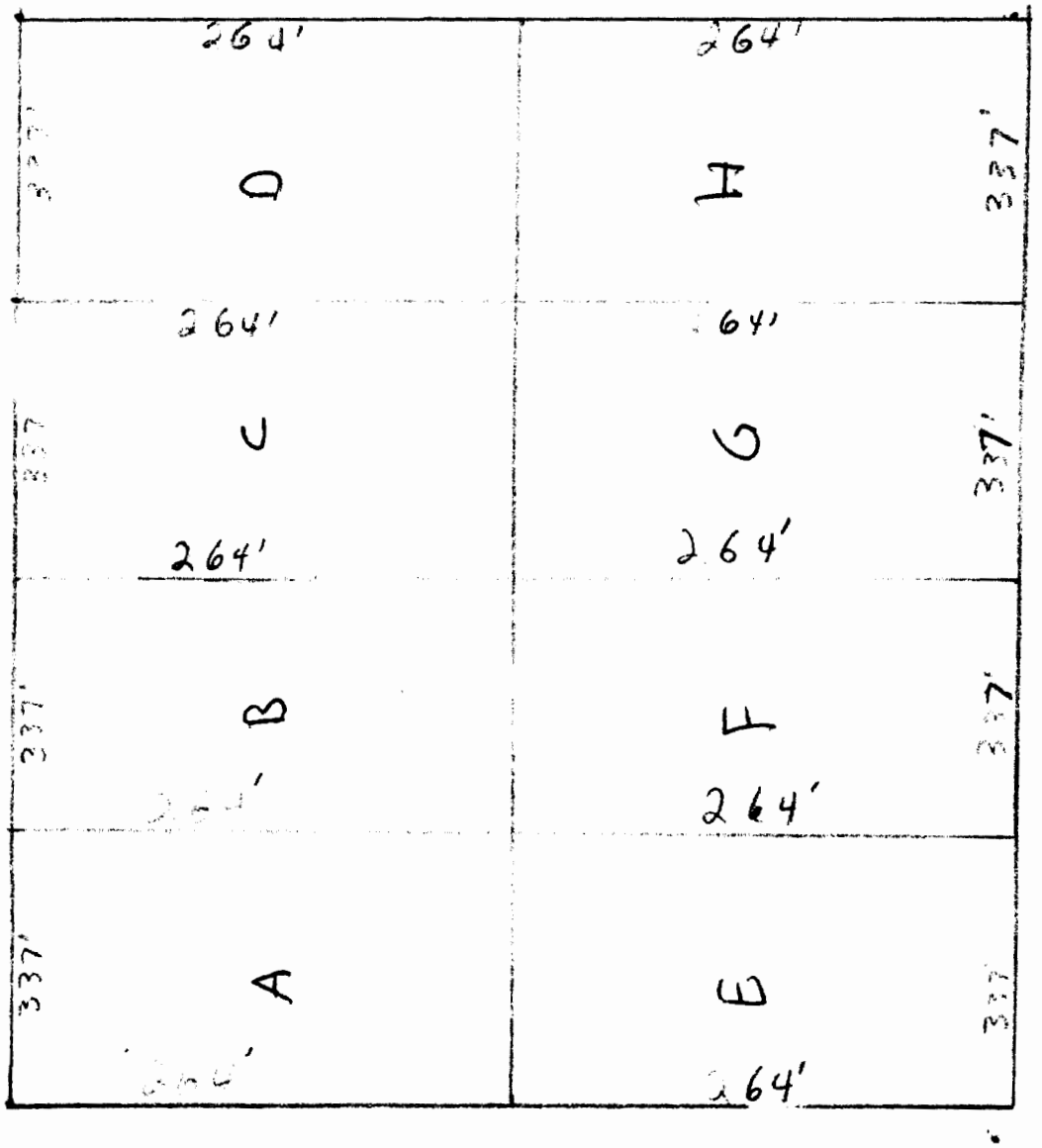
DIAGRAM #1 PAGE #2



Cell # 7

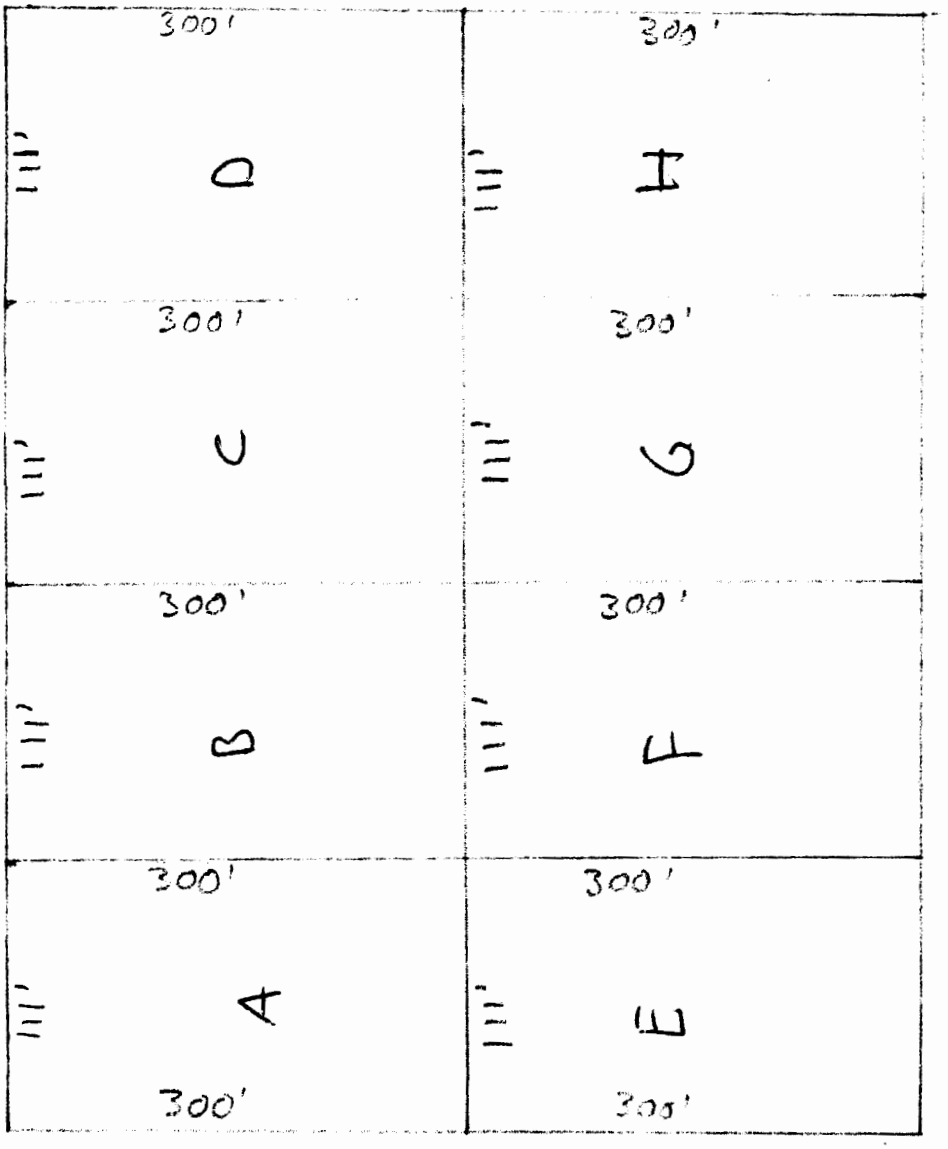
N

DIAGRAM # 1 PAGE # 3



Cell #11

DIAGRAM #1 PAGE #4



CELL 4

N

DIAGRAM #2