

1R - 484

REPORTS

DATE:

6-4-12

RECEIVED

June 4, 2012

MAR 14 2013

Mr. Geoffrey Leking
Environmental Bureau
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**Re: Approval for Annual Monitoring and Closure Attainment Program, NM
OCD Remediation Project No. 1R-484, Elliott B-9 #2 & 3 Tank Battery, Unit
D (NW/4, NW/4), Section 9, T22S, R37E, John H. Hendrix Corporation, Lea
County, New Mexico**

Dear Mr. Leking:

Larson & Associates, Inc. (LAI), on behalf of John H. Hendrix Corporation (JHHC), requests approval to conduct one annual monitoring event at of the Elliott B-9 #2 and 3 Tank Battery (Site). Only monitoring well one MW-1 will be sampled to further confirm reduction of chloride and total dissolved solids to demonstrate chemical constituent stabilization, followed by subsequent closure of the Site. Remediation actions conducted thus far included soil excavation, liner installation, and revegetation of the former, closed production pit, is as presented in the Remediation Report No. 1R-484, submitted to the New Mexico Oil Conservation Division (NM OCD) on December 18, 2009. A report of analytical data will be reported to NM OCD within 45 days after receipt and review of analysis from the laboratory semi-annually.

Specifically, the following remediation actions occurred at the Site:

- 2007 NM OCD approved soil remediation plan consisted of soil excavation and liner installation.
 - Two areas of concern where excavated to approximately seven feet.
 - A liner was installed at the bottom of the seven foot excavations.
 - Soil was also excavated to approximately three feet below ground surface west and south of the tank battery and filled with clean soil.
- Excavations were seeded with range grass.

For your review, the updated analytical data table is enclosed with this letter, in addition to the 2009 Remediation Report No. 1R-483. The analytic data display decreases in the concentrations of chloride and total dissolved solids as follows:

- The monitor well, MW-1, chloride concentration from October 2007 was **3,500 mg/Kg** and the concentration was **2,780 mg/Kg** as of March 2012.
- The Total Dissolved Solids (TDS) concentration in October 2007 was **6,610 mg/Kg** and the concentration was **5,140 mg/Kg** as of March 2012.

JHHC requests approval to monitor MW-1 on an annual basis with subsequent closure upon evidence of further reduction of constituents to NMWQQS standards or stabilization of constituent concentrations. A response is respectfully requested. Please contact Jeremy Cannady (jeremy@laenvironmental.com) at 432.687.0901 to discuss steps for moving forward in remediation actions at the Site, thank you.

Sincerely,

Jeremy Cannady
LAI Staff Professional / Engineering

Enclosures

- 1) Analytical Data Table, B-9 #1, 4, and 5 Tank Battery Elliott, *Updated as of March 2012*
 - 2) 2009 Remediation Report Elliott B-9 #2, and 3 Tank Battery, Report No. 1R-484
- c: Ms. Carolyn Haynes – JHHC Midland
Mr. Glenn Von Gonten - NMOCD

Table 2
Water Quality Parameters Summary
John H. Hendrix Corporation
Elliott B-9 Tank Battery #2 and #3 (1R0484)
Unit D (NW/4,NW/4), Section 9, Township 22 South, Range 37 East
Lea County, New Mexico

Water Quality	Collection Date	Alkalinity, Total	Chloride	Nitrate	Sulfate	Total Dissolved Solids
NMWQCC Standard (mg/L)		--	250	10	600	1,000
MW-01	10/16/2007	271	3,500	9.87	243	6,610
	4/8/2008	273	4,410	--	226	7,980
	9/4/2008	340	3,400	--	177	6,440
	6/3/2009	342	4,500	--	202	7,790
	9/10/2009	--	3,750	--	--	7,260
	2/14/2011	--	2,670	--	--	5,800
	9/29/2011	--	2,700	--	--	4,830
	3/2/2012		2,780			5,140
MW-02	10/16/2007	188	222	--	205	973
	4/8/2008	210	229	--	203	920
	9/4/2008	280	194	--	173	856
	6/3/2009	259	204	--	188	892
	9/10/2009	--	200	--	--	879
	2/14/2011	--	156	--	--	1,120
	9/29/2011	--	192	--	--	1,050
	3/2/2012		205			919
MW-03	6/30/2009	--	100	--	--	622
	9/10/2009	--	84	--	--	589
	2/14/2011	--	107	--	--	658
	9/29/2011	--	130	--	--	706
	3/2/2012		158			691

Notes

Alkalinity analyzed via EPA Method 310.1.

Anions analyzed via EPA Method 300.

TDS analyzed via EPA Method 160.1 or via Method 2540C.

All values reported in Milligrams per liter (mg/L, parts per million).

< - Indicates the value is less than Method Detection Limit (MDL).



March 7, 2013

Certified Mail
Return Receipt Requested

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Attn: Edward J. Hansen
Oil Conservation Division
1200 South St. Francis Dr
Santa Fe, NM 87505

MAR 14 2013

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Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: NMOCD Project No. 1R483 and 1R484

Dear Edward J. Hansen:

As per your request via email I have attached the referenced documents for your review.
I appreciate your quick response to this matter and look forward to discussing these projects.
If you have any questions regarding this letter or the information enclosed, please contact me at (432) 687-0901.

Sincerely,

Larson & Associates, Inc.

A handwritten signature in cursive script that reads 'Jeremy Cannady'.

Jeremy Cannady
Staff Professional - Engineering
jeremy@laenvironmental.com

Enclosure (6)

Approval for Annual Monitoring and Closure Attainment Program, 1R-484

Approval for Annual Monitoring and Closure Attainment Program, 1R-483

Analytical Data Table, B-9 #1, 4 and 5

Analytical Data Table, B-9 #2 and 3

2009 Remediation Report, 1R-484

2009 Remediation Report, 1R-483

Jeremy J. Cannady

From: Hansen, Edward J., EMNRD [edwardj.hansen@state.nm.us]
Sent: Thursday, March 07, 2013 2:35 PM
To: Jeremy J. Cannady
Subject: RE: NMOCD Project No. 1R483 and 1R484

Dear Mr. Cannady,

Sorry, I was not able to locate any correspondence (since over a year ago) for either site.

Please send the below-reference documents to the OCD within 10 days. Thank you for your cooperation in this matter.

Edward J. Hansen
Hydrologist
Environmental Bureau
505-476-3489

From: Jeremy J. Cannady [<mailto:jeremy@laenvironmental.com>]
Sent: Thursday, March 07, 2013 1:19 PM
To: Hansen, Edward J., EMNRD
Subject: NMOCD Project No. 1R483 and 1R484

Good afternoon!

Mr. Hansen,

There was a document sent requesting closure for these two sites mentioned in the subject line last year. Can you give me an update as I have not heard what the status is. If you cannot locate the documents then I can redraft them and send them to you. I apologize for being late in my inquiry.

Thanks,

Jeremy J. C. Cannady
Professional Staff/Engineering
Larson and Associates, Inc.
507 N. Marienfeld, Suite 200
Midland, TX 79701
Cell: 432-212-7662
Email: jeremy@laenvironmental.com