

NM1 - ____45____

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**High Cl Soil Isolation
and Removal Plan
Approval**

September 2014

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

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

Jami Bailey, Division Director
Oil Conservation Division



September 10, 2014

Danny Watson
Jay Dan Landfarm LLC
P.O. Box 632
Lovington, New Mexico 88260

**RE: High Chloride Soil Identification, Isolation, and Removal Plan
Jay Dan Landfarm, LLC
Permit NM1-045
Location: Unit E of Section 32, Township 15 South, Range 35 East, NMPM
Lea County, New Mexico**

Dear Mr. Watson:

The Oil Conservation Division (OCD) has completed the review of Jay Dan Landfarm LLC's (Jay Dan) request, dated August 29, 2014 and received by OCD on September 10, 2014, to grant approval of a plan for the identification, isolation, and removal of high chloride (greater than 500 mg/kg) soils within the treatment zone of Cells 2 and 4 and the assessment of the vadose zone to determine if a release has occurred at the OCD permitted landfarm (Surface Waste Management Facility Permit NM-1-045). Based on the information provided in the request, the plan is hereby approved with the following understandings and conditions:

1. Jay Dan shall comply with all applicable requirements of the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978), and all conditions specified in this approval and shall complete the project in accordance with the August 29, 2014 dated plan; and
2. Jay Dan shall obtain written approval from OCD prior to implementing any changes to the August 29, 2014 dated plan

Please be advised that approval of this request does not relieve Jay Dan of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve Jay Dan 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 I Office, Hobbs

August 29, 2014

RECEIVED OCD

2014 SEP 10 P 2: 52

Mr. Jones:

In the future, please send all correspondence and approvals to JayDan, they no longer need my services.

Thanks,
Eddie W. Seay

Their contact information:

JayDan Landfarm
Box 632
Lovington, NM 88260

ATTN: Danny Watson 575-631-3482

August 29, 2014

NMOCD Environmental
ATTN: Brad Jones
1220 South St. Francis Dr.
Santa Fe, NM 87505

RE: JayDan Landfarm (NM-0045)
Chloride Remediation

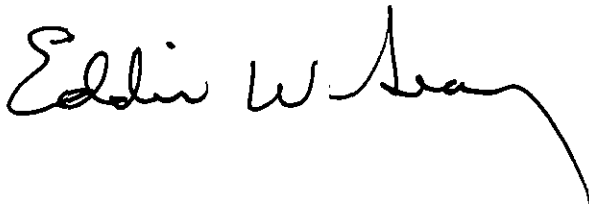
Mr. Jones:

Find final "work Plan" for chloride remediation at JayDan Landfarm, as you directed.
This report replaces and updates the original plan dated July 9, 2014.

If this meets your approval, please let JayDan know and they will move forward with the
remediation, as approved.

If you have any questions or need anything further, please let me know.

Sincerely,

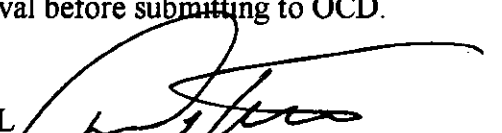
A handwritten signature in black ink, reading "Eddie W. Seay". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Eddie W. Seay
Eddie Seay Consulting
601 W. Illinois
Hobbs, NM 88242
575-392-2236
seay04@leaco.net

cc: JayDan Landfarm

WORK PLAN
Isolation and Removal of High Chloride Soils
JayDan Landfarm (NM-01-0045)
Cells 2 and 4

JayDan plan to get in compliance with the chloride requirement is to grid sample both cells independently. (A grid map will be attached to final plan for both cells.)

1. Lay out grid in cell 2, separating into 15 different sampling items. Cell 4 will have 18 sampling points since cell 4 is slightly larger.
 2. Collect at least 9 to 12 samples from each grid segment. Composite the samples to make one sample per grid segment. The composite samples will be taken from the treatment are from 2 to 4 inches of surface. One sample per grid segment will be sent to the lab for testing using test method (300.1).
 3. When analytical has been received for each grid segment and it is determined which segments of the grid have chloride which exceeds 500 ppm, (which is based on depth of groundwater), we will grid each segment which showed elevated chloride and continue to test for chloride until we isolate the high chloride for each segment area, so as not to remove any more material than necessary.
 4. Once the high chloride soil has been isolated for each segment of the grid, and with OCD approval, excavate the soils down to the native ground surface and haul these soils to an OCD approved landfill, (Lea Land, CRI, Gandy-Marley, or Sundance), accompanied by a C-138.
 5. After soils have been removed and properly disposed of re-sample the native ground below each remediate area for chloride to confirm cleanup. The chloride sampling of the native ground or vadose area will consist of four (4) randomly selected individual grab samples taken from beneath the impacted areas. The samples will be taken from native surface to 6 inches below native surface. When the analytical is received, a comparison will be made of background or PQL from lab, whichever is higher. If a release had occurred, as per Rule 36 15 E5, notify OCD and move forward with additional sampling and testing for all the constituents in subsection A and B of 20.6.2.3103 NMAC, and BTEX, TPH (418.1) and Chloride. When this analytical is received, submit an explanation and/or plan for remediation.
 6. Will document with photos, analytical, C-138 and disposal manifest, and facility grid map of each cell showing sampling locations and remediated areas. This final plan will be sent to JayDan for approval before submitting to OCD.
 7. Final report will be sent to OCD.
- JAYDAN LANDFARM APPROVAL 

with Prejudice

Cell 2 Jay Dan

440			600
1	6	11	
2	7	12	
3	8	13	
4	9	14	
5	10	15	

Cell 4 Jay Dah

440			250
1	7	13	
2	8	14	
3	9	15	
4	10	16	
5	11	17	
6	12	18	