

1R - 427-81

APPROVALS

YEAR(S):

2006

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, May 19, 2006 3:48 PM
To: 'Gilbert Van Deventer'
Cc: Carolyn Haynes; Kristin Farris Pope
Subject: RE: Suspension of BTEX at certain sites

OCD hereby approves of the request with the following condition:

1. If oil is present, or conditions change that BTEX may be found then the approval is rescinded.
2. This approval is included in all reports.

Please be advised that NMOCD approval of this plan does not relieve the owner/operator of Responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Gilbert Van Deventer [mailto:gilbertvandeventer@cox.net]
Sent: Friday, May 19, 2006 3:33 PM
To: Price, Wayne, EMNRD
Cc: Carolyn Haynes; Kristin Farris Pope
Subject: Re: Suspension of BTEX at certain sites

The constituents of concern are chlorides and TDS.

Gilbert J. Van Deventer, PG, REM, NMCS
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 Work/Mobile: 432-638-8740
 Fax: 413-403-9968
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----- Original Message -----

From: Price, Wayne, EMNRD
To: gil@rthicksconsult.com
Cc: [Carolyn Haynes](#) ; [Kristin Farris Pope](#)
Sent: Friday, May 19, 2006 1:22 PM
Subject: RE: Suspension of BTEX at certain sites

What are the constituents of concern?

From: Gil Van Deventer [mailto:gil@rthicksconsult.com]
Sent: Friday, April 21, 2006 9:16 AM
To: Price, Wayne, EMNRD
Cc: Carolyn Haynes; Kristin Farris Pope
Subject: Suspension of BTEX at certain sites

Wayne, I just wanted to clarify an issue on some of these Stage 1 and 2 Abatement Plans where we

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propose suspension of sampling and analyzing for BTEX.

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In the NMOCD-approved Stage 1 and 2 Abatement Plan for the EME M-9 SWD site we proposed that *"Analysis for BTEX concentrations will be suspended, as each component of BTEX has been below the laboratory method detection limit of 0.001 mg/L since August 22, 2003 (10 consecutive quarters)."*

The same goes for the EME P-6 Release site and its two monitoring wells. In the approved Stage 1-2 plan we state: *"Analysis for BTEX concentrations should be suspended, as there has been no indication of dissolved hydrocarbons since the groundwater monitoring program began in January 2002 (13 consecutive quarters)."* My understanding that the local Hobbs Office is also reviewing this abatement plan.

The same situation *would* apply to the BD J-26 Junction Box site but we are still within the 30-day public comment period and plan approval by OCD will take a little time after that. In the Stage 1-2 abatement plan for J-26 we state that we will do the following:

- *Collect depth to water measurements and ground water samples for chloride and TDS analysis from the on site monitoring wells (MW-1, MW-2, MW-3) and area water wells (WW-1, WW-5, WW-8, WW-12, WW-19, WM #138, WM #220, and Wallach #914) on a quarterly frequency.*

With the J-26 site we don't specifically state that we will *"suspend BTEX analysis"* but that is the intention. Each component of BTEX has been below the laboratory method detection limit of 0.001 mg/L at this site since it began in 2002 (15 quarters).

Please confirm if you are in agreement with the suspension of BTEX sampling on any of these sites as we are about to initiate the second quarter sampling.

Thanks,
Gil

Gilbert J. Van Deventer

R. T. Hicks Consultants, Ltd.

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