

3R - 424

**GENERAL
CORRESPONDENCE**

2011

VonGonten, Glenn, EMNRD

From: Peace, Jeffrey [Peace.Jeffrey@bp.com]
Sent: Wednesday, August 24, 2011 3:23 PM
To: VonGonten, Glenn, EMNRD
Cc: John Pietz
Subject: RE: Heath GC G-1 remediation project
Attachments: Heath G-1 DP NOI.pdf

Glenn,

Thanks. Here is a scanned copy of the NOI. I will mail the original to you tomorrow.

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Wednesday, August 24, 2011 11:40 AM
To: Peace, Jeffrey
Subject: RE: Heath GC G-1 remediation project

Jeff,

WQCC 1201 specifies OCD for oil and gas facilities, not NMED-GWQB.

... shall file a notice with the Ground Water Quality Bureau of the department for discharges that may affect ground water, and/ or the Surface Water Quality Bureau of the department for discharges that may affect surface water. However, notice regarding discharges from facilities for the production, refinement, pipeline transmission of oil and gas or products thereof, the oil field service industry, oil field brine production wells, geothermal installations and carbon dioxide facilities shall be filed instead with the Oil Conservation.

Glenn

From: Peace, Jeffrey [<mailto:Peace.Jeffrey@bp.com>]
Sent: Wednesday, August 24, 2011 11:01 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: Heath GC G-1 remediation project

Glenn,

I have the NOI ready but have one question. Your e-mail states the NOI is sent to OCD, but the NOI shows the NMED WQB as the recipient. Do I send it to both departments or will you forward it to NMED if deemed necessary?

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Thursday, August 18, 2011 2:48 PM
To: Peace, Jeffrey
Cc: Bailey, Jami, EMNRD; Chavez, Carl J, EMNRD; John Pietz
Subject: RE: Heath GC G-1 remediation project

Jeff,

After talking with John, I'm pretty certain that BP will need to obtain a discharge permit because it intends to discharge / re-inject treated contaminated ground water. The process is fairly simple (see attachment for PN).

1. BP submits a Notice of Intent to OCD pursuant to 20.6.2.1201 NMAC (tell us about the remediation system).
2. OCD formally determines that a discharge permit is required or is not required.
3. OCD will send BP an application to file
4. BP submits application and OCD reviews for Admin Completeness
5. OCD informs BP that its application is complete and the public notice clock starts (see 20.6.2.3108 NMAC)
6. BP makes public notice
7. OCD issues draft discharge permit and makes second public notice with opportunity to request hearing. (The permit will state that BP's abatement program will be handled separately so as to prevent having to do permit modifications if the system needs to be changed.)
8. After no hearing requests, the discharge permit is issued as final.

I will check into the formality of a temporary authorization to discharge as soon as your ground water recovery and treatment system is complete.

Please give me a call if you have any questions.

Glenn von Gonten
505-476-3488

From: Peace, Jeffrey [<mailto:Peace.Jeffrey@bp.com>]
Sent: Tuesday, August 16, 2011 6:46 AM
To: VonGonten, Glenn, EMNRD
Cc: Chavez, Carl J, EMNRD; John Pietz
Subject: Heath GC G-1 remediation project

Dear Mr. Von Gonten,

Based on a telephone conversation on August 9, 2011 between our consultant, John Peitz with Trihydro Corporation, and Mr. Carl Chavez with NMOCD, we are sending you this e-mail message to update you as to the status of groundwater remediation at BP America's Heath GC G-1 well site located in San Juan County, NM.

We are currently conducting air sparging at the site, which began in early 2010, and we are installing a groundwater extraction and treatment system which should be operational by September 15, 2011. We have been sampling groundwater monitor wells on a quarterly basis since early 2010. The data has shown a marked decrease in benzene, toluene, ethylbenzene and xylenes (BTEX) concentrations over the past year due to the effectiveness of the air sparge system. Currently all downgradient sentinel monitor wells are non-detect for BTEX. Operation of the groundwater extraction system will ensure hydraulic control of the plume, while continued operation of the air sparge system and operation of the treatment system will continue to remediate the impacted groundwater.

Based on previous correspondence with your office and the August 9, 2011 conversation between Mr. Chavez and John Pietz, we will continue remediation activities at this site pursuant to Section 19.15.29 of the New Mexico Administrative Code. As Mr. Pietz discussed with you, we will assume you concur with this approach unless we hear otherwise from the NMOCD within seven days.

Sincerely yours,

Jeff Peace, P. E.
Field Environmental Advisor
BP America
200 Energy Court
Farmington, NM 87401
Peace.Jeffrey@bp.com

(505) 326-9479
(505) 330-4937 (Cell)

VonGonten, Glenn, EMNRD

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We are currently conducting air sparging at the site, which began in early 2010, and we are installing a groundwater extraction and treatment system which should be operational by September 15, 2011. We have been sampling groundwater monitor wells on a quarterly basis since early 2010. The data has shown a marked decrease in benzene, toluene, ethylbenzene and xylenes (BTEX) concentrations over the past year due to the effectiveness of the air sparge system. Currently all downgradient sentinel monitor wells are non-detect for BTEX. Operation of the groundwater extraction system will ensure hydraulic control of the plume, while continued operation of the air sparge system and operation of the treatment system will continue to remediate the impacted groundwater.

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Sincerely yours,

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VonGonten, Glenn, EMNRD

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To: 'Peace, Jeffrey'
Cc: Bailey, Jami, EMNRD; Chavez, Carl J, EMNRD; John Pietz
Subject: RE: Heath GC G-1 remediation project
Attachments: PN Flow Chart.20.6.2new and mods.pdf; New and Mod WQCC Notice Regs.pdf

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(505) 330-4937 (Cell)

VonGonten, Glenn, EMNRD

From: John Pietz [jpietz@trihydro.com]
Sent: Monday, August 01, 2011 10:55 AM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey
Subject: BP Heath Site Case No. 3R424

Hi Glenn,

We have been conducting air sparge remediation at this site under Section 19.15.29 NMAC per your approval. We have also been installing a groundwater extraction and treatment system, but due to delays in construction have not completed installation or startup. We hope to start up the system by the end of August.

Based on the date of your verbal approval, our one year period under Section 19.15.29 is up at the end of August 2011. Will we need an abatement plan after our year is up under 19.15.30.11 NMAC to continue site remediation?

Would you be available for a meeting in Santa Fe August 22 or 23 to discuss the site?

Thanks.

John M Pietz, PE
Senior Engineer



OUR SAFETY IS MY RESPONSIBILITY

516 Chamiso Lane NW
Albuquerque, New Mexico 87107
307/745-7474 (phone)
307/745-7729 (fax)
307/399-0977 (mobile)
jpietz@trihydro.com
www.trihydro.com

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VonGonten, Glenn, EMNRD

From: John Pietz [jpietz@trihydro.com]
Sent: Wednesday, November 17, 2010 10:57 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: 3R42 BP Farmington Groundwater Injection Wells

Thanks Glen. I appreciate the response.

From: VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]
Sent: Wednesday, November 17, 2010 10:54 AM
To: John Pietz
Cc: Sanchez, Daniel J., EMNRD; Powell, Brandon, EMNRD
Subject: RE: 3R42 BP Farmington Groundwater Injection Wells

John,

After review, OCD has determined that Trihydro does not need a UIC Class V well to re-inject treated ground water as part of its remediation system at this time. As I mentioned, Trihydro can proceed at risk for one year with its ground water remediation program. At that time, OCD will determine whether Trihydro will need to obtain a WQCC Discharge Permit for its activities.

Please contact me if you have any questions.

Glenn

From: John Pietz [mailto:jpietz@trihydro.com]
Sent: Wednesday, November 17, 2010 8:21 AM
To: VonGonten, Glenn, EMNRD
Subject: 3R42 BP Farmington Groundwater Injection Wells

Glenn,

Regarding our discussion on Monday, just wondering if you had a chance to consider the injection permit requirement for our planned groundwater remediation. We are picking up the OSE groundwater withdrawal permit today, and would like to get going on the remediation.

Again, this would be extracting water, treating it using air stripping and re-injecting it within the same zone to capture and re-circulate the groundwater.

If you have any more questions, please give me a call.

Thanks again.

John M Pietz, PE
Senior Engineer



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VonGonten, Glenn, EMNRD

From: Emmet, Lisa [Lisa.Emmet@bp.com]
Sent: Tuesday, October 12, 2010 3:30 PM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey
Subject: Heath Site - remediation plan OCD Case 3R424
Attachments: HeathRPTText.pdf

Hi Glenn,

Here is a copy of the Heath Site Remediation Plan and site summary as we discussed several weeks ago. You had indicated that BP should receive a written approval from you to go ahead with work at the site. BP further understands that upon your approval of this plan, remediation may be conducted for up to one year, and after that year an abatement plan may be required under 19.15.30.11 NMAC. Please indicate your approval via e-mail at your earliest convenience. Thank you very much for your assistance with this project progression.

Best Regards,

*Lisa Emmet
BP America
Strategy Manager - E&P and Decommissioning
Remediation Management
501 Westlake Park Boulevard
Rm 28.144D
Houston, Texas 77079
w 281 366 7064
f 281 366 7094*

VonGonten, Glenn, EMNRD

From: John Pietz [jpietz@trihydro.com]
Sent: Tuesday, September 28, 2010 2:52 PM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey; Emmet, Lisa
Subject: OCD Case No. 3R424 Injection Authorization Application

Glenn,

Our remediation plan submitted to you under 19.15.29 NMAC included possible injection of treated groundwater as part of our groundwater recovery and treatment system for the site. Would such injection require an Application for Authorization to Inject, Form C-108, and would this application qualify for administrative approval? Or under 19.15.29 can we inject within the one year time frame under a verbal from you?

Thanks.

John M Pietz, PE
Senior Engineer

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www.trihydro.com

-----Original Message-----

From: Emmet, Lisa [<mailto:Lisa.Emmet@bp.com>]
Sent: Tuesday, September 07, 2010 4:27 PM
To: John Pietz
Subject: FW: Heath Site C-141

FYI

Lisa Emmet
BP America
Strategy Manager - E&P and Decommissioning
Remediation Management
501 Westlake Park Boulevard
Rm 28.144D
Houston, Texas 77079
w 281 366 7064
f 281 366 7094

-----Original Message-----

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Tuesday, August 31, 2010 1:27 PM
To: Emmet, Lisa
Subject: RE: Heath Site C-141

Lisa,

I have created an OCD Case No. for this site. Please refer to 3R424 in all future correspondence. Also, please send me all available data on this site. OCD will review and have BP conduct its investigation and remediation pursuant to 19.15.29 NMAC.

Thanks,

Glenn von Gonten

-----Original Message-----

From: Emmet, Lisa [<mailto:Lisa.Emmet@bp.com>]
Sent: Wednesday, August 25, 2010 11:19 AM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey; Shaw, Buddy D; John Pietz
Subject: Heath Site C-141

Hi Glenn,

Attached is the original C-141 that was submitted to your office. Also attached is the notification letter to the BLM. The BLM notification has information that is now outdated, BP has kept the BLM informed on our continued progress. We will gather reports, current analytical data, and complete a Remedial Action Plan and send your way shortly. Thank you so much for your assistance and guidance on the phone yesterday. I really appreciate you taking so much time to show me the website and explain some of the regulations and how they are applied. Based on our discussion, we will submit a Remedial Action Plan to you for approval that will outline our plan for remediation as an interim response under Part 29. We will continue to monitor the site closely and operate our remediation system(s) for up to a year. If further work is needed at that time, then an abatement plan and/or remediation plan will be submitted for review and approval (Part 30). It is our understanding that we do not need permits at this time to use recovery wells for fluid extraction and to create a hydraulic barrier during this interim response period. Please let me know if you have any questions on the remediation this far. Thank you.

Best Regards,

Lisa Emmet
BP America
Strategy Manager - E&P and Decommissioning Remediation Management
501 Westlake Park Boulevard
Rm 28.144D
Houston, Texas 77079
w 281 366 7064
f 281 366 7094

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VonGonten, Glenn, EMNRD

From: Peace, Jeffrey [Peace.Jeffrey@bp.com]
Sent: Monday, September 20, 2010 11:35 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: Heath GC G No. 1 remediation plan
Attachments: HeathRPTText.pdf

Let's try this.

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Friday, September 17, 2010 2:29 PM
To: Peace, Jeffrey
Subject: RE: Heath GC G No. 1 remediation plan

Jeff,

No luck. This is what I get when I try to open the attachment.

FILE QUARANTINED

Antigen for Exchange removed HeathRPTText.ZIP since it was found to match the FILE FILTER= unnamed: *.zip file filter.

Glenn

From: Peace, Jeffrey [<mailto:Peace.Jeffrey@bp.com>]
Sent: Friday, September 17, 2010 2:28 PM
To: VonGonten, Glenn, EMNRD
Subject: RE: Heath GC G No. 1 remediation plan

It should not have been zipped. I will try it again. See if this works.

From: VonGonten, Glenn, EMNRD [<mailto:Glenn.VonGonten@state.nm.us>]
Sent: Friday, September 17, 2010 2:25 PM
To: Peace, Jeffrey
Subject: RE: Heath GC G No. 1 remediation plan

Jeff,

The State IT filters out any files that are zipped, so your plan did not make it through.

Glenn

From: Peace, Jeffrey [<mailto:Peace.Jeffrey@bp.com>]
Sent: Friday, September 17, 2010 2:17 PM
To: VonGonten, Glenn, EMNRD
Subject: Heath GC G No. 1 remediation plan

Glenn,

Attached is the Heath GC G No. 1 remediation plan letter and tables. I will send you the figures shortly. A printed copy of the entire package was sent to you yesterday.

Jeff Peace, P. E.
HSE Advisor
BP America
200 Energy Court
Farmington, NM 87401
Peace.Jeffrey@bp.com
(505) 326-9479
(505) 330-4937 (Cell)

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VonGonten, Glenn, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Tuesday, August 31, 2010 12:27 PM
To: 'Emmet, Lisa'
Subject: RE: Heath Site C-141

Lisa,

I have created an OCD Case No. for this site. Please refer to 3R424 in all future correspondence. Also, please send me all available data on this site. OCD will review and have BP conduct its investigation and remediation pursuant to 19.15.29 NMAC.

Thanks,

Glenn von Gonten

-----Original Message-----

From: Emmet, Lisa [<mailto:Lisa.Emmet@bp.com>]
Sent: Wednesday, August 25, 2010 11:19 AM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey; Shaw, Buddy D; John Pietz
Subject: Heath Site C-141

Hi Glenn,

Attached is the original C-141 that was submitted to your office. Also attached is the notification letter to the BLM. The BLM notification has information that is now outdated, BP has kept the BLM informed on our continued progress. We will gather reports, current analytical data, and complete a Remedial Action Plan and send your way shortly. Thank you so much for your assistance and guidance on the phone yesterday. I really appreciate you taking so much time to show me the website and explain some of the regulations and how they are applied. Based on our discussion, we will submit a Remedial Action Plan to you for approval that will outline our plan for remediation as an interim response under Part 29. We will continue to monitor the site closely and operate our remediation system(s) for up to a year. If further work is needed at that time, then an abatement plan and/or remediation plan will be submitted for review and approval (Part 30). It is our understanding that we do not need permits at this time to use recovery wells for fluid extraction and to create a hydraulic barrier during this interim response period. Please let me know if you have any questions on the remediation this far. Thank you.

Best Regards,

Lisa Emmet
BP America
Strategy Manager - E&P and Decommissioning Remediation Management
501 Westlake Park Boulevard
Rm 28.144D
Houston, Texas 77079
w 281 366 7064
f 281 366 7094

VonGonten, Glenn, EMNRD

From: Emmet, Lisa [Lisa.Emmet@bp.com]
Sent: Wednesday, August 25, 2010 11:19 AM
To: VonGonten, Glenn, EMNRD
Cc: Peace, Jeffrey; Shaw, Buddy D; John Pietz
Subject: Heath Site C-141
Attachments: Scan001.PDF

Hi Glenn,

Attached is the original C-141 that was submitted to your office. Also attached is the notification letter to the BLM. The BLM notification has information that is now outdated, BP has kept the BLM informed on our continued progress. We will gather reports, current analytical data, and complete a Remedial Action Plan and send your way shortly. Thank you so much for your assistance and guidance on the phone yesterday. I really appreciate you taking so much time to show me the website and explain some of the regulations and how they are applied. Based on our discussion, we will submit a Remedial Action Plan to you for approval that will outline our plan for remediation as an interim response under Part 29. We will continue to monitor the site closely and operate our remediation system(s) for up to a year. If further work is needed at that time, then an abatement plan and/or remediation plan will be submitted for review and approval (Part 30). It is our understanding that we do not need permits at this time to use recovery wells for fluid extraction and to create a hydraulic barrier during this interim response period. Please let me know if you have any questions on the remediation this far. Thank you.

Best Regards,

Lisa Emmet
BP America
Strategy Manager - E&P and Decommissioning Remediation Management
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