

From: Debi Moore
To: [Price, Henryetta](#)
Cc: [Bratcher, Mike, EMNRD](#); [Jay McKee](#); [apando@jcleo.com](#)
Subject: Re: J Cleo - WSLU Tract 003 Well #9 Flowline Release - Proposed Remediation Work Plan and Associated Documents
Date: Wednesday, July 20, 2016 11:39:55 AM
Attachments: [4DBE15B7-1BB4-49FA-9F61-89A17FCC1487\[99\].png](#)
[4DBE15B7-1BB4-49FA-9F61-89A17FCC1487\[56\].png](#)

Henryetta,

We don't anticipate chlorides in excess of 1,000ppm penetrating greater than 4' bgs due to release volume and surface impact size. We reviewed with the OCD today and they are fine with either an encapsulation liner installation or removal of all soils greater than 1,000ppm. If desired, we can make an ultimate determination once site characterization is performed. Is this acceptable to the BLM? If so, we are prepared to provide notification and commence work.

Thanks,
Debi Moore

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From: "Price, Henryetta" <hprice@blm.gov>
Date: Thursday, July 14, 2016 at 2:25 PM
To: Debi Sport Moore <debi@sportenvironmental.com>
Cc: Mike Bratcher <mike.bratcher@state.nm.us>, Jay McKee <jmckee@jcleo.com>, "apando@jcleo.com" <apando@jcleo.com>
Subject: Re: J Cleo - WSLU Tract 003 Well #9 Flowline Release - Proposed Remediation Work Plan and Associated Documents

Hey Debi,

Question, what is your plan of action if chlorides are higher than 1,000 ppm greater than 4 ft? Otherwise, I do not have any issues with the proposed plan.

Please give me 3 days notice prior to sampling so that I may be onsite for visual confirmation. Thank you.

Henryetta Price

Environmental Protection Specialist
Bureau Of Land Management

Hprice@blm.gov

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On Thu, Jul 14, 2016 at 12:55 PM, Debi Moore <debi@sportenvironmental.com> wrote:

Mike and Henryetta,

Sport Environmental is submitting, on behalf of J. Cleo Thompson, the proposed remediation work plan, revised C-141, completed NMOCD Site Ranking Criteria Form, and other associated documents for your review. We request your review and a determination of your approval for the plan detailed below.

Revised C-141 and Associated Data Submittal

On June 3, 2016, we submitted a C-141 on behalf of J. Cleo Thompson for a flowline release for the West Square Lake Unit 002 (Leonard "E") site. Well fluids from three facilities collect within the flowline that experienced a release. Ms. Henryetta Price, BLM, requested that we name the release after the facility in closest proximity to the release site. Attached please find the distance determination map which resulted in the site being renamed as West Square Lake Unit (WSLU) Tract 003 Well #9 flowline release on the updated C-141 (attached).

NMOCD Site Ranking Criteria Form and Acceptable Clean-up Limit(s) Determination

In addition, I'd like to thank you for reviewing the specifics of this release with me last week. Attached please find the OCD Site Ranking Criteria Form with the calculated ranking score and acceptable concentrations highlighted (in blue). The ranking score calculated for the WSLU Tract 003 Well #9 release site was zero (0).

As discussed, the **Acceptable Clean-Up Criteria** for the site are:

Constituent	Clean-Up Criteria Limit (ppm)
Benzene	10
BTEX	50
TPH	5,000
Chlorides	1,000

Proposed Remediation Work Plan and Request for Approval

Benzene, BTEX, TPH, and Chlorides will be addressed and composite samples collected to verify successful clean-up of the release site to the limits listed in the table above. Laboratory analysis of Benzene, BTEX, and TPH concentrations will be performed by an approved and NELAC accredited laboratory using Methods 8021B and SW8015Mod, respectively.

Chlorides will be addressed as part of the site reclamation with particular attention paid to the root zone (top four feet of soil). Soil with chloride concentrations greater than 1,000 ppm within the root zone will be removed and properly disposed of at an approved facility. Delineation of chlorides will be performed using field titrations to 250 ppm and confirmed with laboratory analysis of composite samples from the excavation walls and 4' excavation floor (Method EPA 300). Feathering of the site with native soils and reseeding with a BLM approved seed mixture will be performed after cleanup confirmation.

Please let us know if you have any questions regarding the work plan outlined within this message. If acceptable to both the NMOCD and the BLM, we will schedule the field work portion of the job, perform the appropriate one-call and provide required 48-hour notification to the OCD and the BLM. Please advise of your approval or disapproval of the remediation work plan addressed above.

Thank you,

Debi Moore



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