

Venegas, Victoria, EMNRD

From: Michael Gant <MGant@lucid-energy.com>
Sent: Monday, September 21, 2020 2:08 PM
To: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Hamlet, Robert, EMNRD; Eads, Cristina, EMNRD
Cc: Matthew Eales; Glen Blake
Subject: [EXT] Juniper 1 - nAB1927551697 meeting request

Mr. Bratcher,

I wanted to discuss the current status of a remediation project that was rejected earlier this year, Juniper 1. The reference number for the site is listed below.

- Juniper 1 - nAB1927551697

Here is a brief background of the site details. The initial release happened on 7/15/19. HRL supervised remediation at the Juniper site. HRL referenced the 2005 Chevron Groundwater map rather than proving groundwater in these remote areas with dispersed and dated groundwater information. Soil was remediated to the standards listed in NMAC 19.15.29 Table 1 relative to a groundwater depth approximately 50' shallower than the interpreted local groundwater due to lack of current, proximal groundwater data and without drilling. Victoria later notified me of the closure denial for these sites. I have listed the reasons for rejections below.

- Juniper 1 report lacked current, non-interpolated groundwater data

Lucid would greatly appreciate the opportunity to further discuss this site with the OCD to determine a logical and cost-effective approach to closure with a variance for lacking groundwater data considering the current state of the industry and operations in SE NM. Lucid would like to continue to foster a positive productive relationship with the OCD and appreciates the increased flexibility during this period. If you would like, we can setup a conference call or Teams meeting at your convenience.

Thanks,

Michael Gant

Environmental Field Coordinator



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