

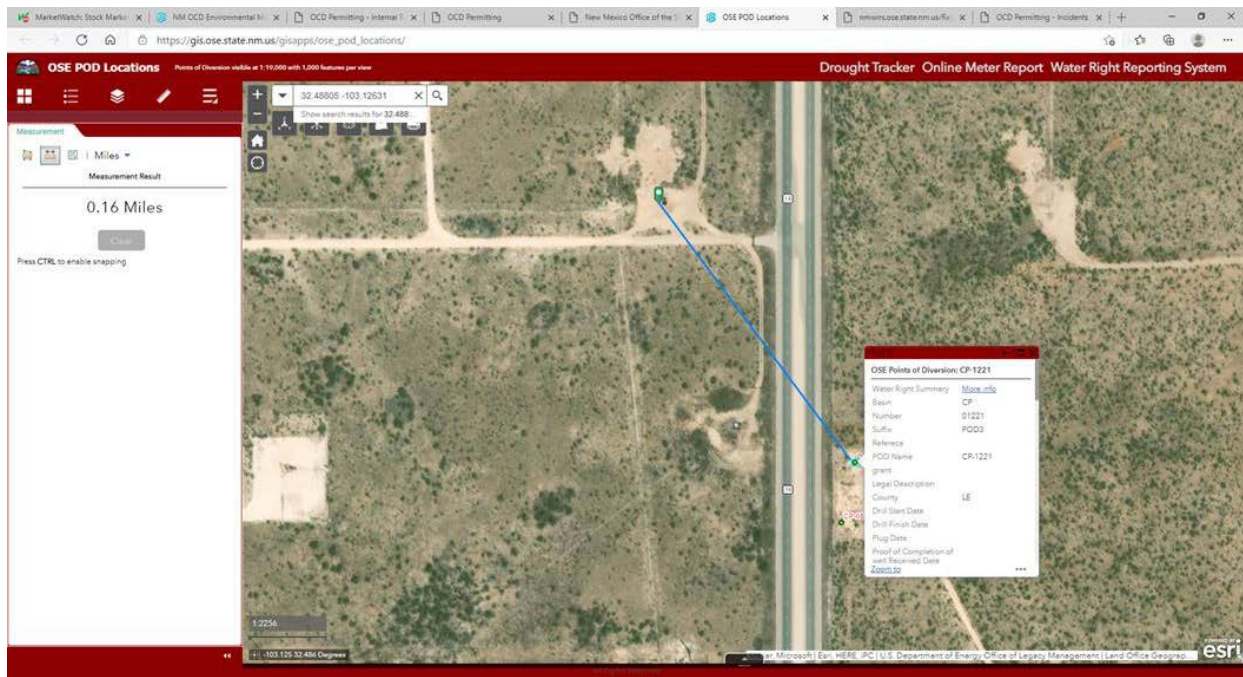
From: Hamlet, Robert, EMNRD
To: "Baker, Larry"
Cc: Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD
Subject: RE: Remediation Denied - Apache - EBDU 22 - (Incident #NRM2017549520)
Date: Tuesday, February 9, 2021 1:26:00 PM

Larry,

The OSE site includes this particular well (CP 01221), our NM OCD Environmental Map does not. It looks like we need an update to our Map. We should be able to approve the remediation plan for chlorides under 10,000 mg/kg. I will go back and approve the plan and image it into the incident file.

The ½ mile and 25 year instructions come from a Spill Rule Clarification Document that has been put on the OCD website.

IX. DETERMINING DEPTH TO GROUNDWATER: a. The remediation levels provided in Table I are largely dependent upon depth to groundwater. As such, the OCD focuses upon depth to water estimation. 19.15.11(A)(2) NMAC allows for various means of determining depth to groundwater. If nearby wells are used, it is preferable if they are situated within ½-mile of the release, the water level information is no more than 25 years old, and well construction information is provided. If the water level information does not meet these criteria, the OCD may require boring to a limited depth for verification. If the operator has applicable information which does not meet the above preference, we will review it on a case by case basis to determine if it is acceptable.



soils will need to meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less.

- If you feel the depth to groundwater is >50', a shallow borehole can be drilled to 51' allowing for verification of the depth. If water is not visible after reaching bottom-hole and waiting 72 hours, the OCD will accept this as evidence. We would just need a copy of the driller's log.

Please let me know if you have any further questions.

Regards,

Robert Hamlet • Environmental Specialist - Advanced

Environmental Bureau

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<http://www.emnrd.state.nm.us/OCD/>



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