

From: [Billings, Bradford, EMNRD](#)
To: ["Katie Jones"](#); ["Edward Hansen"](#); [Yu, Olivia, EMNRD](#); [Hernandez, Christina, EMNRD](#)
Subject: CAP and Soil closure Request BD- SWD System/BD Jct. B-1 (1R426-256)
Date: Wednesday, June 20, 2018 10:43:00 AM

June 20, 2018

Katie Jones – Rice Operating
Ed Hansen – Basin

Re: BD- SWD System/BD Jct. B-1 (1R426-256) Soil Closure Request and CAP.

Following review of submitted report, data sets and discussion the following:

Albeit this is not a traditional Corrective Action Plan (CAP), as the location is still in groundwater delineation phase, nonetheless:

1. The Oil Conservation Division (OCD) concurs that the soil assessment component as previously approved has been completed and as such, the BASIN request for closure of soil remediation activities is approved. This does not mean the location in toto is closed.
2. The general work plan for groundwater investigation is also approved, with one exception. OCD would prefer that the proposed monitor well identified as MW-1 be placed nearer to soil boring locations identified as SB-7 and SB -8. This area appears to be of deeper and higher chloride contamination. As a reminder, Monitor wells should be arranged and completed as per State Engineer protocol as applicable. In general, OCD prefers that ten (10) feet of threaded and slotted PVC be placed within the water zone and five (5) feet of same material be above the air water interface. If Basin/ROC wishes otherwise please communicate with OCD.

For future reference, all TPH evaluations should incorporate extended range analysis. Assessing GRO, DRO and MRO.

OCD appreciates your efforts on behalf of this location. If there are any questions please contact this office.

Please keep this electronic communication, as NO paper copy will follow.

Sincerely,

Bradford Billings
EMNRD/OCD
Santa Fe

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