

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, January 30, 2014 8:53 AM
To: Kimberly M. Wilson (kwilson@talonlpe.com); David Adkins (dadkins@talonlpe.com); 'jbc@judahoil.com'
Subject: Green A Fed 10 SWD

Kimberly,

As we discussed, OCD has two open spill reports on the Green A Fed 10 (30-015-21748). The tracking numbers for these two releases are: 2RP-682 (date of release 11/2/09) and 2RP-2121 (date of release 12/12/13). In preparing to put this email together, I made an observation on the C-141 submitted for 2RP-682 that I did not notice, nor did we discuss during yesterday's meeting. The date of release, as shown, was 11/2/09. OCD received the C-141 on 11/23/09. OCD did not process (enter it into the data base and image) the C-141 until 3/31/11, a little over a year after receipt of the C-141. As I recall, by late 2010, the District 2 office was running several months behind in getting most C-141s processed. This C-141 was submitted as an Initial and Final Report. When it did get processed, due to the net fluid volume released, and the remedial action taken, OCD did not approve the document as an Initial and Final, and, via a sticker placed on the form, OCD requested a remediation proposal. Due to the passage of time, I doubt that Mr. Campanella was even aware of OCD's request. With that being said, at this time, OCD does request a diagram showing the spill path on and off the location, for the 2009 release. If the spill path on location is the same as for 2RP-2121, I will accept combining that portion of the two releases. The 2009 C-141 indicates that there was a narrow flowpath (5' wide) that ran approximately 300' off of the location. OCD does request that area be identified, and representative samples be obtained at intervals (to be determined) along the flowpath, from surface to a minimum of 6' bgs. Field analyses may be utilized with select samples sent to an approved lab for confirmation. Deeper samples may be required depending on the results of the analytical tests, including the field screens.

For the 2RP-2121 release, it is OCD's understanding that remedial activities have commenced, and are ongoing. OCD typically will not have an issue with what could be considered immediate response actions, such as excavating visually identifiable and/or field screen identified impacted material, and hauling to an approved disposal. At this time, for this release, please submit a detailed report on what has been done on this release to date. Include a site diagram that shows the release flowpath/impacted area, and points where all samples were obtained. Include all analytical data obtained to date, to include field screen data and lab data. Please submit the analytical data in a chart format that correlates with the site diagram to allow for quicker review. Upon OCD review of actions taken, analytical data, and, site ranking criteria, a determination can then be made on a path forward to close the site out.

With this facility being situated on Federal surface, BLM approval of what has been done, and, the path forward to closure, will be required.

If you have any questions or concerns, or if you would like to schedule an on-site or office meeting to discuss the project, please contact me.

Thank you,

Mike Bratcher

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CONDITIONS

Action 375442

CONDITIONS

Operator: TRINITY ENVIRONMENTAL SWD I, L.L.C. PO BOX 60110 MIDLAND, TX 79711	OGRID: 371786
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CONDITIONS

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