

AP - 43

APPROVALS

YEAR(S):

2008

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Tuesday, July 01, 2008 1:08 PM
To: 'Hack Conder'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Scott Curtis'; 'mburrows@valornet.com'; 'Hall, Sharon'
Subject: Stage 2 Abatement Plan (AP-43) EME Jct. A-20 - Administratively Complete

Dear Mr. Conder:

The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Stage 1 Abatement Plan and Stage 2 Abatement Plan (AP-43) and draft Public Notice, dated January 30, 2007, for the above referenced site. The NMOCD hereby conditionally deems the Stage 2 Abatement Plan (AP-43) administratively complete.

Please keep in mind that the NMOCD cannot approve of the Plan until at least 30 days after you have provided public notice (which must be provided within 15 days). However, to expedite the approval process, the NMOCD recommends that the following amendments are made to the Plan:

1. The Stage 2 Abatement Plan for the Remediation of Soil must include that a clay liner (at least one foot thick) or equivalent liner approved by the NMOCD shall be installed over the excavated area.
2. The Stage 2 Abatement Plan for the Remediation of Soil must include that at least 4 feet of clean soil (less than 500 mg/Kg chloride) will be used for the cover material over the clay liner, including selected topsoil to encourage native plant growth.
3. The Stage 2 Abatement Plan for the Groundwater must include that an estimation of the chloride mass that has contaminated the groundwater by the release at the Rice EME Jct. A-20 Site and a plan for the removal of that chloride mass from the groundwater. An existing groundwater monitoring well may be used for this purpose. Also, please propose a treatment and / or disposal method for that chloride mass.

Also, the NMOCD hereby conditionally approves the Public Notice for the Stage 2 Abatement Plan (AP-43):

1. Please change the name of Carolyn Doran Haynes to Marvin Burrows.
2. Please include that groundwater will be treated for chloride removal.
3. Please add the underscored phrase in the last line of the submitted draft Public Notice, "...Division shall allow at least thirty (30) days after the date of publication of this notice during which written requests for a public hearing that includes reasons why a hearing should be held and written comments may be submitted to him."

Also, please be advised that NMOCD approval of this plan does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

7/1/2008

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau