3R - 399

GENERAL CORRESPONDENCE

YEAR(S):
2005

From: Martin, Ed, EMNRD
Sent: Wednesday, July 20, 2005 9:13 AM
To: 'Robert Stuard'
Subject: RE: Guidance on Pit Remediation - CDX Gas - Romero Com 1 30-039-22892
Robert,

It looks like you have almost everything you might need to submit to OCD for approval. A few things that you need to include with your workplan are:

1. Analyticals of the bottom of the excavation and the sidewalls.
2. Any other information you might have as to how the lateral extent of the contamination was determined.
3. Your plan as to how you will assure that groundwater at the site will not be adversely affected. Include depth to groundwater and any plans you have concerning the installation of a liner of some sort, if that will be necessary.

These pieces of information should be enough to approve an alternate plan. The plan itself does not have to be elaborate. Keep it simple and just describe what CDX has done at the site, and what CDX intends to do.

Let me know if you need further information. This may all be done via e-mail to the extent that is feasible.

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Ph: 505-476-3492
Fa: 505-476-3462
email: ed.martin@state.nm.us

From: Robert Stuard [mailto:robert.stuard@cdxgas.com]
Sent: Thursday, July 14, 2005 3:25 PM
To: Martin, Ed, EMNRD
Cc: Robert Smith; chester deal; Ron Johnston; landfarms@msn.com
Subject: Guidance on Pit Remediation - CDX Gas - Romero Com 1

Ed,
Thanks for taking the time to speak with me this morning. As you requested, I have attached a PDF file with a map, location sketch and images for your review.

We are seeking your guidance on what to do next with this remediation. We have removed approximately 186,000 cubic feet of soil of which we estimate one third as contaminated. The well is shut-in. It normally produces 150 MCFD.

Informational points.
Mid April, 2005 eliminated discharge into the two earthen pits.
June 3, 2005 began excavation.
June 12, 2005 shut-in well due to excavation encroachment on facilities.
Moved facilities off location a few days later.
There is approximately 15' to 20'of clean overburden above the contaminated layer.
PID readings were zero in the southeast corner of the smaller southern excavation.
PID readings have varied from 250 to 370 ppm TPH in the larger northern excavation.
Hit sandstone bedrock at 30' in the larger excavation.
Have not encountered groundwater and do not expect to since we are high on a mesa.

We have not taken final samples for lab analysis.
July 1, 2005 suspended excavation to reevaluate operation and seek guidance from NMOCD.

Would it be possible to leave the remaining contamination in place and "risk out" the remainder of the location? If this is possible, what steps or requirements would be necessary to achieve this? Please let me know what you think. If I have forgotten anything or you have any questions, please call me at the number(s) listed below or send an email. Thanks a bunch!
"STU"

Robert M. Stuard
Senior Facilities Engineer
CDX Gas, LLC
2010 Afton Place
Farmington, NM 87401
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Office - 505-324-5403

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Attachments: CDX Romero Com 1 Remed Info.pdf
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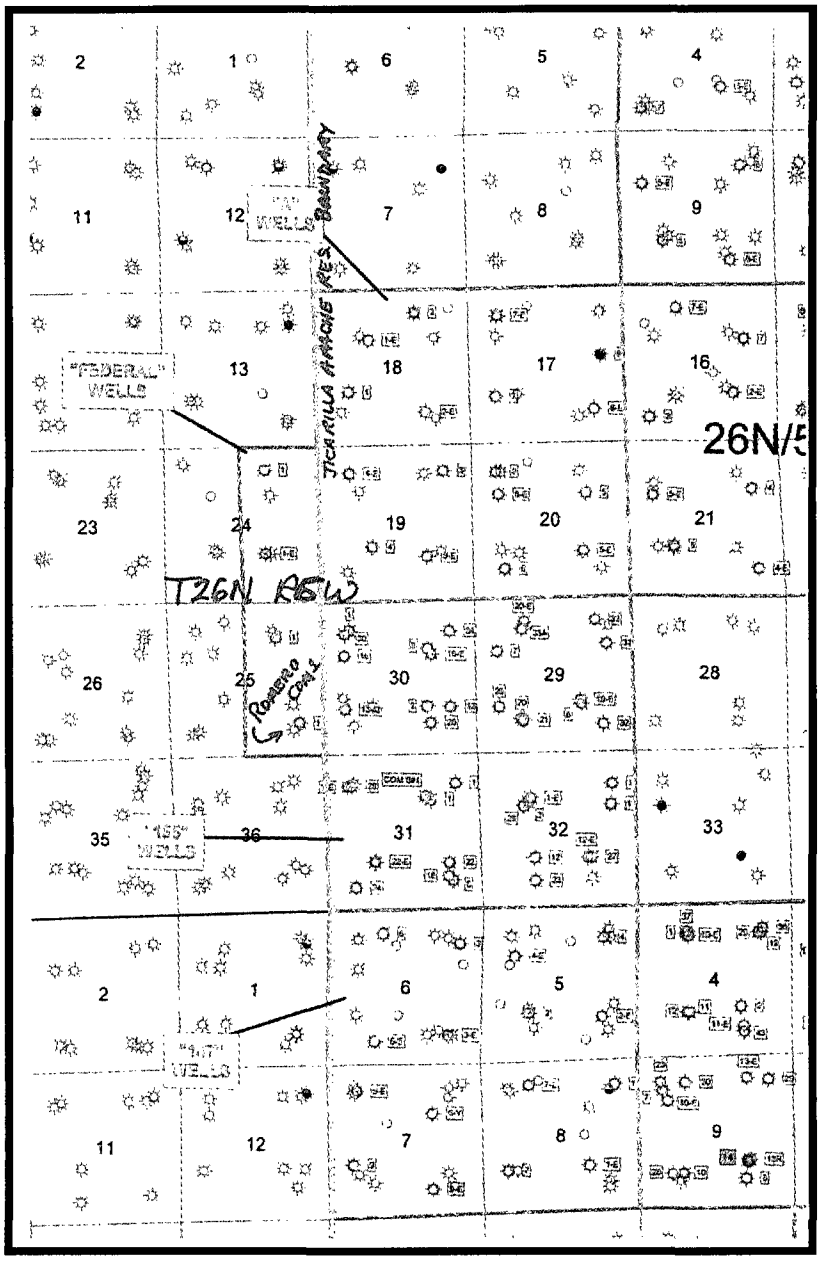
Romero Com 1
Sec 25, T26N, R6W
Rio Arriba County, NM

Well Location Map



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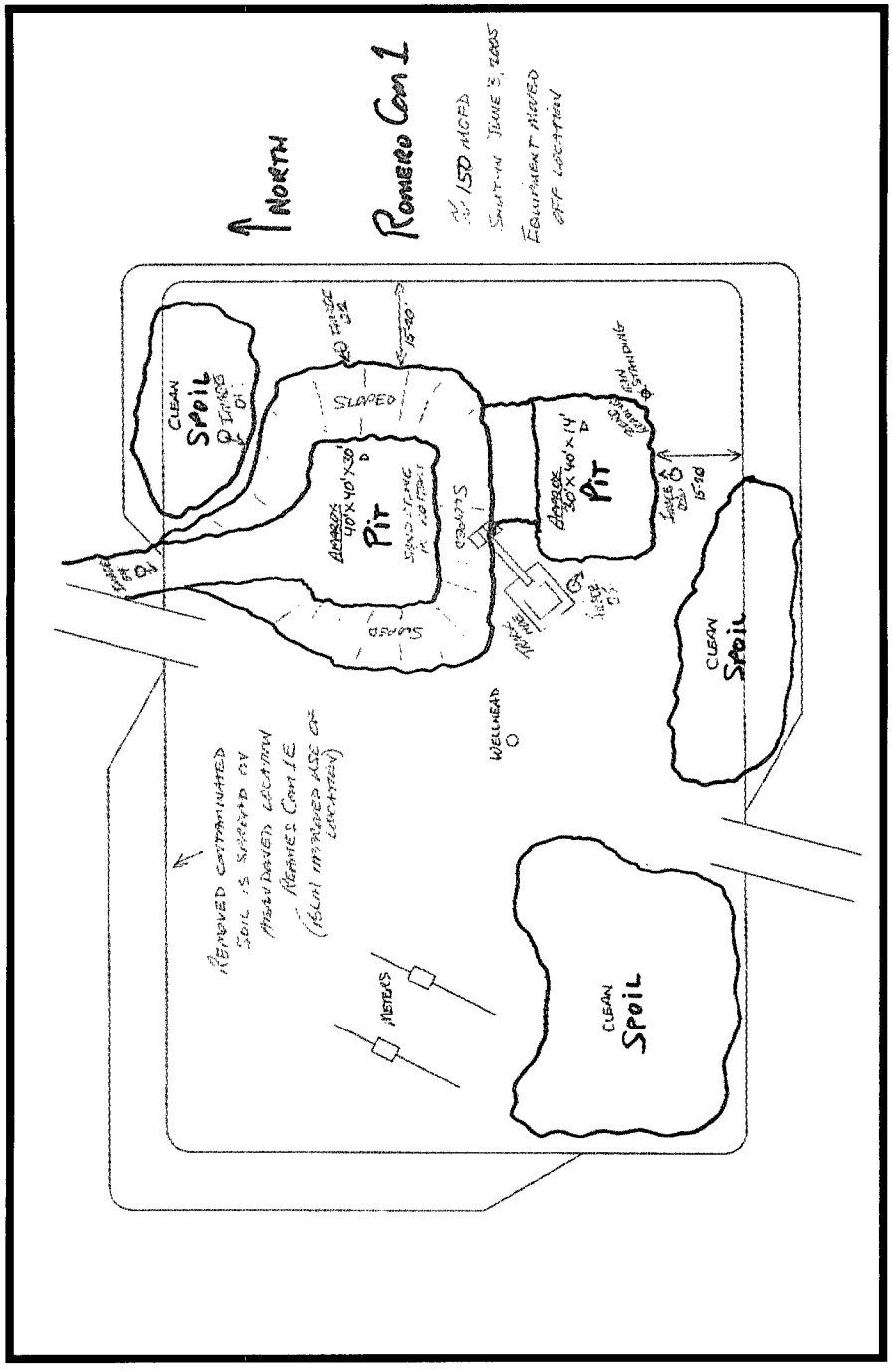
Location Excavation Sketch



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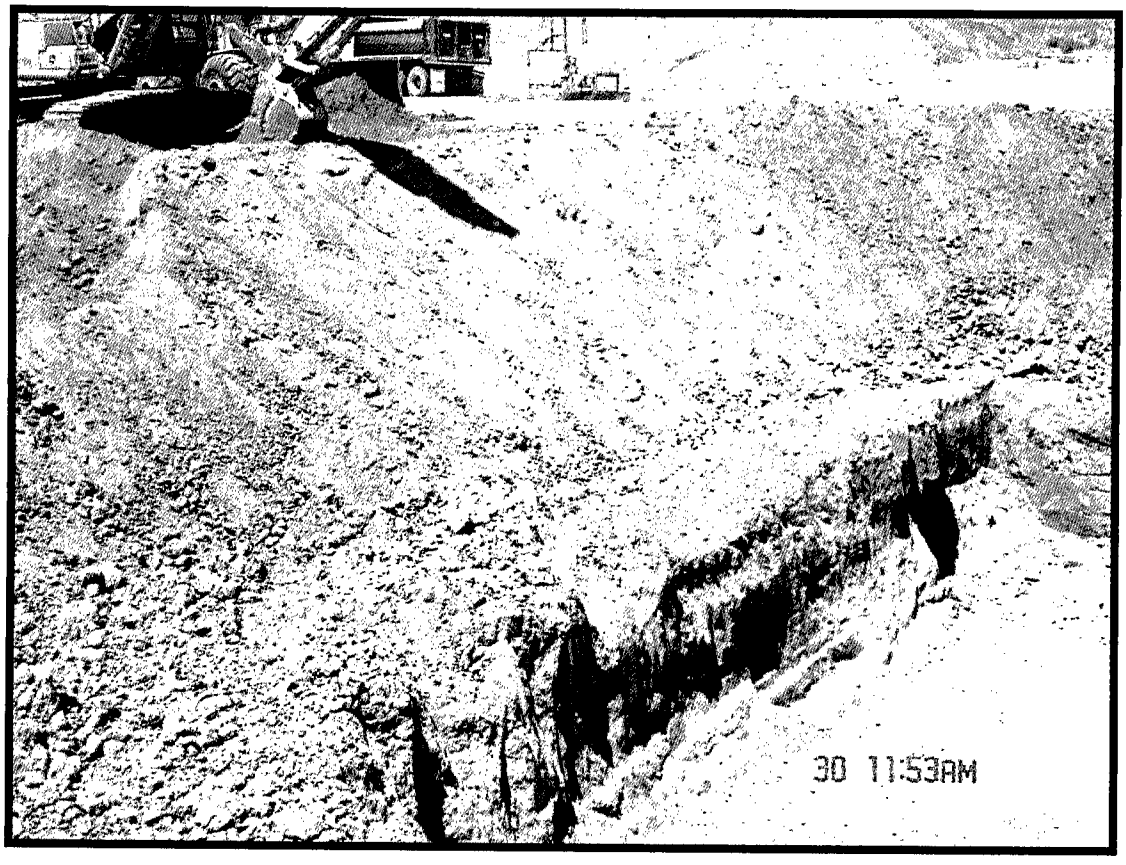

Looking Southwest at Southern Edge of Sloped Excavation

CDX Rio, LLC Operator
Romero Com 1
Sec 25, T26N, R6W
Rio Arriba County, NM

Looking North at Dividing Soil Wall Between Larger and Smaller Excavations

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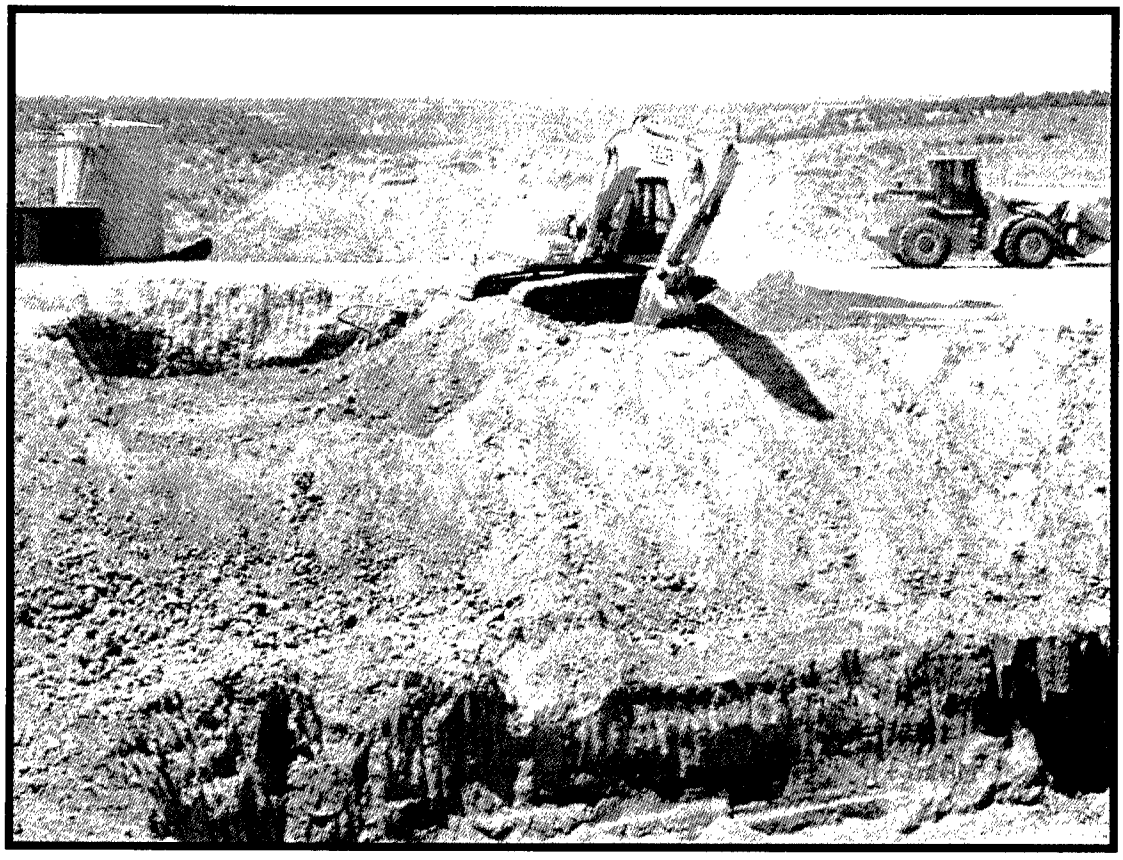
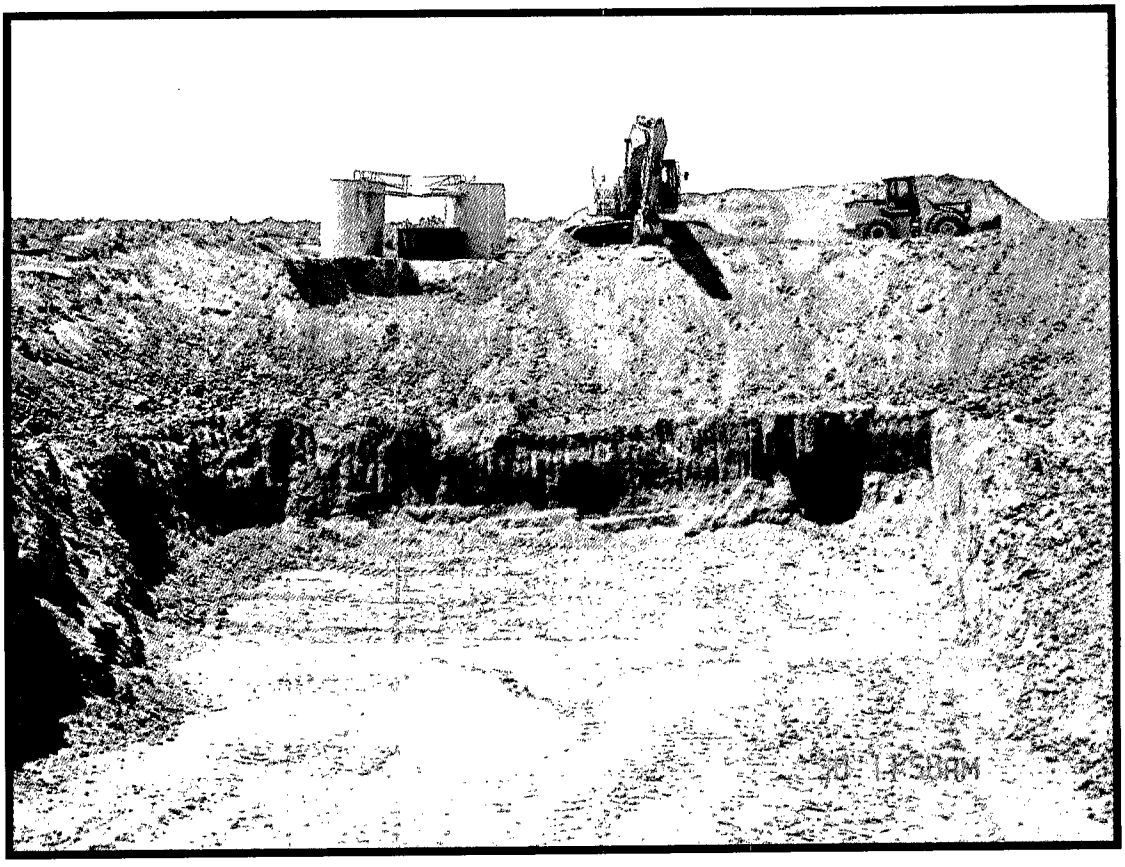
Rio Arriba County, NM

Excavation Images



Looking South at Southern Edge of Larger Sloped Excavation

CDX Rio, LLC Operator
Romero Com 1
Sec 25, T26N, R6W
Rio Arriba County, NM



Looking South at Larger Portion of the Sloped Excavation

Looking Southeast at the Smaller Excavation