

From: Casadevall, Bill
To: Mann, Ryan; Eads, Cristina, EMNRD; Winscott, John
Cc: Billings, Bradford, EMNRD; terry@thestandardenergy.com; saskia@bergsteinenterprises.com; Vincent D'Alise (vincent@thestandardenergy.com); Ayarbe, John
Subject: [EXT] RE: Remediation Plan 1RP-4429 and 1RP-5056
Date: Wednesday, March 4, 2020 11:00:29 AM

Thanks, Ryan.

Bill

Bill Casadevall

Geologist

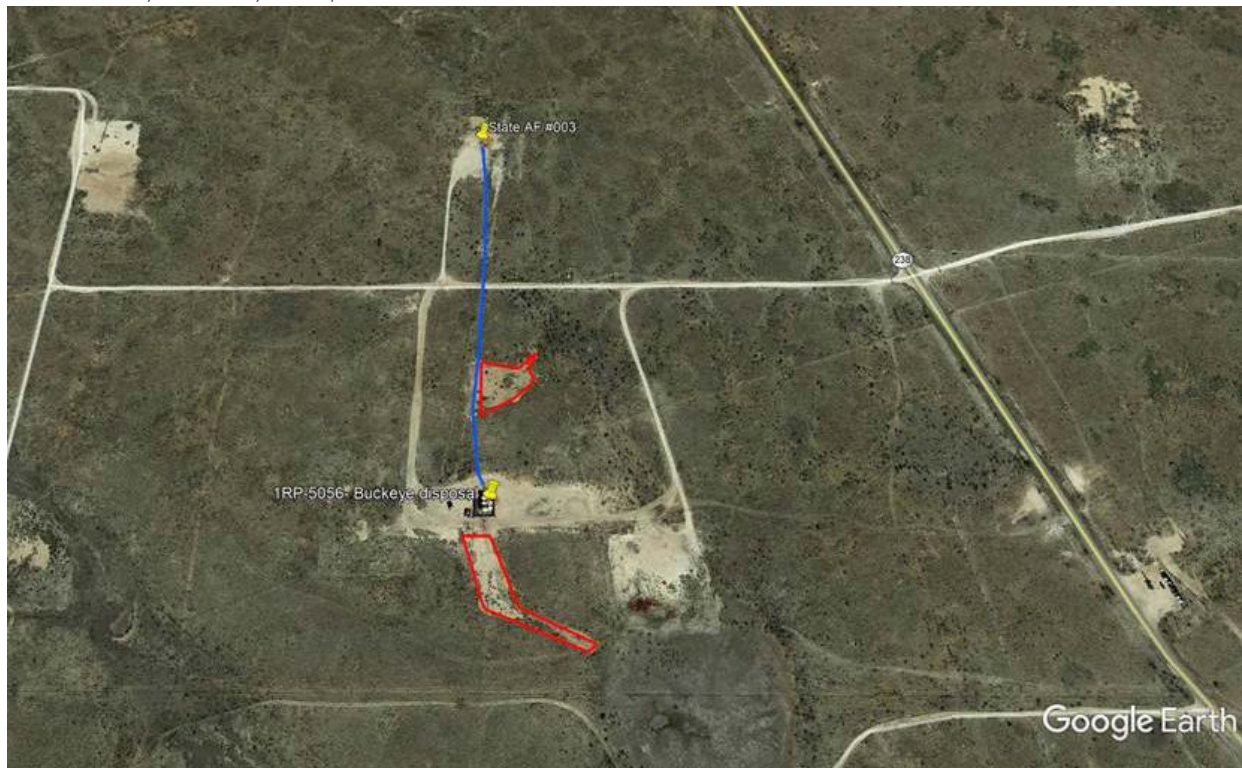
Daniel B. Stephens & Associates, Inc.
a Geo-Logic Associates Company

D (505) 353-9108
bcasadevall@geo-logic.com

From: Mann, Ryan [<mailto:rmann@slo.state.nm.us>]
Sent: Wednesday, March 04, 2020 10:58 AM
To: Casadevall, Bill; Eads, Cristina, EMNRD; Winscott, John
Cc: Billings, Bradford, EMNRD; terry@thestandardenergy.com; saskia@bergsteinenterprises.com; Vincent D'Alise (vincent@thestandardenergy.com); Ayarbe, John
Subject: RE: Remediation Plan 1RP-4429 and 1RP-5056

I have attached a Google Earth image, hopefully this will clarify. The areas outlined in red are the places I referenced in the previous email as requiring some additional investigation. The blue line represents the approximate path of the pipeline between the loading station and the disposal well.

Let me know if you have any other questions.



Ryan Mann
Remediation Specialist
Surface Resources
Office: (575)392-3697
Cell: (505)699-1989

New Mexico State Land Office
914 N. Linam Street
Hobbs, NM 88240
rmann@slo.state.nm.us
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From: Casadevall, Bill [mailto:casadevall@geo-logic.com]
Sent: Wednesday, March 4, 2020 10:47 AM
To: Mann, Ryan <rmann@slo.state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Winscott, John <jwinscott@slo.state.nm.us>
Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; terry@thestandardenergy.com; saskia@bergsteinenterprises.com; Vincent D'Alise (vincent@thestandardenergy.com) <vincent@thestandardenergy.com>; Ayarbe, John <jayarbe@geo-logic.com>
Subject: [EXTERNAL] RE: Remediation Plan 1RP-4429 and 1RP-5056

Good morning Ryan,
Would it be possible for you to send me a map or aerial photo showing the additional sample locations?

Bill

Bill Casadevall

Geologist

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From: Mann, Ryan [mailto:rmann@slo.state.nm.us]
Sent: Wednesday, March 04, 2020 10:45 AM
To: Casadevall, Bill; Eads, Cristina, EMNRD; Winscott, John
Cc: Billings, Bradford, EMNRD; terry@thestandardenergy.com; saskia@bergsteinenterprises.com; Vincent D'Alise (vincent@thestandardenergy.com); Ayarbe, John
Subject: RE: Remediation Plan 1RP-4429 and 1RP-5056

Good morning Mr. Casadevall,

Thank you for the remediation plan. In addition to the proposed sample point locations provided in and around the tank battery, NMSLO will require soil samples (TPH, Benzene, and chloride) should be taken on the area to the south of the loading area where there appears to have been a release in the past judging by the lack of vegetation in the area. Additionally, there appear to have been another release at some time in the past along the pipeline ROW between to disposal well and loading station. This area will need delineation and remediation as well.

Let me know if you have any questions.



Ryan Mann

Remediation Specialist

Surface Resources

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From: Casadevall, Bill [<mailto:casadevall@geo-logic.com>]

Sent: Tuesday, March 3, 2020 2:25 PM

To: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Winscott, John <jwinscott@slo.state.nm.us>

Cc: Mann, Ryan <rmann@slo.state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; terry@thestandardenergy.com; saskia@bergsteinenterprises.com; Vincent D'Alise (vincent@thestandardenergy.com) <vincent@thestandardenergy.com>; Ayarbe, John <jayarbe@geo-logic.com>

Subject: [EXTERNAL] RE: Remediation Plan 1RP-4429 and 1RP-5056

Ms. Eads,

Attached is Buckeye Disposal, Inc.'s (Buckeye's) response to the Oil Conservation Division's (OCD's) comments on Buckeye's work plan to characterize the extent of soil impacts caused by releases of produced water at the State AF #003 SWD site. I assume that this response could be sent directly to you, but please let me know if I need to submit it through the fee portal.

Regards,

Bill

Bill Casadevall

Geologist

Daniel B. Stephens & Associates, Inc.

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From: Eads, Cristina, EMNRD [<mailto:Cristina.Eads@state.nm.us>]

Sent: Wednesday, January 29, 2020 11:21 AM

To: Casadevall, Bill; terry@thestandardenergy.com

Cc: rmann@slo.state.nm.us; saskia@bergsteinenterprises.com; Billings, Bradford, EMNRD
Subject: Remediation Plan 1RP-4429 and 1RP-5056

To whom this may concern,

The NMOCD has reviewed the remediation plan titled, **Work Plan for Characterization and Remediation of State AF #003 SWD Site** for RPs 1RP-4429 and 1RP-5056.

This remediation plan is denied for the following reasons:

- Horizontal delineation is not complete. Buckeye will need to further assess the horizontal limits of the release to 600 mg/kg.
- NMOCD recommends for Buckeye Disposal to provide additional sampling locations for preapproval.
- Depth to groundwater is not adequately identified. When nearby wells are used to determine depth to groundwater, **the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old**, and well construction information should be provided. Buckeye Disposal (Buckeye) will need to drill a borehole on site to 51' bgs and leave it open for at least 24 hours. If there is no evidence of ground water after 24 hours, the OCD will review Buckeye's remediation plan with a copy of the driller's log (see stipulations below). If Buckeye chooses not to drill a borehole to confirm depth to groundwater, the impacted area will need to be further delineated to closure criteria for water at a depth of <50'. For further clarifications regarding the implementation of the spill rule, visit the OCD website:
<http://www.emnrd.state.nm.us/OCD/documents/OCDInternalPolicy-SpillRuleClarifications.pdf>
- NMOCD recommends soil assessment to 4 feet below ground surface or to 600 mg/kg, whichever comes first, to determine the potential vertical remedial efforts.

In the future, a completed C-141 must be included with the submittal of incident related documents on the fee portal.

Thank you for your efforts on these releases. If you have any questions, please feel free to contact Brad Billings (Bradford.Billings@state.nm.us) or me (contact information below).

Cristina Eads

Environmental Bureau

EMNRD – Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505.476.3084

email: Cristina.Eads@state.nm.us

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 groundwater, 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, or local laws and/or regulations.

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