

From: Patterson, Heather, EMNRD
To: ngladden@diversifiedfsi.com
Cc: [Bratcher, Mike, EMNRD](#); ["Robertson, Jeffery"; Hughes, Solomon](#)
Subject: RE: Devon Energy Shugart 25 Federal #1 Remediation Work Plan
Date: Wednesday, September 10, 2014 1:51:00 PM

RE: Devon * Shugart 25 Fed #001 * 30-015-31454 * **2RP-2474**

Ms. Gladden,

The OCD cannot accept this Remediation Work Plan as it is written. PID meter readings only represent VOC levels, and cannot be used to measure the levels of GRO or DRO. In addition, as per NMOCD Guidelines for Remediation of Leaks, Spills and Releases (Section IV.A.2.b), if a PID is used to measure BTEX the RRAL is 100 ppm. The OCD will require laboratory analysis of TPH and chlorides before we consider this site delineated. It is also advantageous to use lab data for BTEX. In the absence of lab confirmation of BTEX, all soils with PID over 100 ppm must be excavated to meet OCD standards.

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.

If you have any questions or concerns, and for notification, please contact me.

Heather Patterson
Environmental Specialist
NMOCD District II
(575)748-1283 ext.101

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(575)748-1283 ext.101

From: Bratcher, Mike, EMNRD
Sent: Tuesday, September 09, 2014 8:16 AM
To: Patterson, Heather, EMNRD
Subject: FW: Devon Energy Shugart 25 Federal #1 Remediation Work Plan
Importance: High

From: Natalie Gladden [<mailto:ngladden@diversifiedfsi.com>]
Sent: Monday, September 08, 2014 5:02 PM
To: Bratcher, Mike, EMNRD; Hughes, Solomon; Robertson, Jeffery
Cc: Michael Patterson; Michael Burton; Carter, Ray; Gladden, Randy; Zuniga, Rudy
Subject: Devon Energy Shugart 25 Federal #1 Remediation Work Plan

Importance: High

All,

Attached you will find the Remediation Work Plan for the Devon Energy Shugart 25 Federal #1. This work plan is covering the reportable release dated 8/8/14.

Please notify me by responding to this email if you approve the plan above.

Thank you and have a great day!

Natalie Gladden

Environmental Director

DFSI Environmental Services

Cell: 575-602-1786

Office: 575-964-8394

Fax: 575-964-8396

Email: ngladden@diversifiedfsi.com

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