

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Tuesday, June 28, 2016 8:37 AM
To: 'Kimberly Huckaba'; Patterson, Heather, EMNRD; Tucker, Shelly
Cc: Smith, Lucas; Bill Green; Craig McMahon; Brittany Neal
Subject: RE: Correction 2RP-3684 Delineation Requirements

RE: 2RP-3684

Kimberly,

OCD does request a representative delineation of the impacted area. The pooling area, which theoretically should be the “worst” spot along the release area, and you have identified as sample locations 003 and 004, will be acceptable for vertical delineation purposes for this site. OCD does agree to a 4’ excavation with liner placement to retard migration of contaminants left behind. Especially in rocky areas, OCD does request adequate cushioning be installed for liner protection . Please provide OCD with analytical data from the proposed delineation prior to backfilling, and provide updates as the project progresses. Federal sites will require like approval from BLM.

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.

Thanks.

Mike Bratcher
NMOCD District 2
811 S. First Street
Artesia, NM 88210
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From: Kimberly Huckaba [mailto:khuckaba@eccgrp.com]
Sent: Monday, June 27, 2016 7:53 PM
To: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD
Cc: Smith, Lucas; Bill Green; Craig McMahon; Brittany Neal
Subject: RE: Correction 2RP-3684 Delineation Requirements

Please note the following correction.

After reviewing the work plan and data presented therein, the pooling area is not in the vicinity of 010, 011, and 012, but near the source of the release in the vicinity of sample locations 003 and 004 where the highest CI values were detected.



Kimberly Huckaba
Project Coordinator/Geologist
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From: Kimberly Huckaba
Sent: Monday, June 27, 2016 6:47 PM
To: 'mike.bratcher@state.nm.us' <mike.bratcher@state.nm.us>; 'heather.patterson@state.nm.us' <heather.patterson@state.nm.us>
Cc: 'Smith, Lucas' <Lucas.Smith@wpxenergy.com>; Bill Green <Bill.Green@eccgrp.com>; Craig McMahon <Craig.McMahon@eccgrp.com>; Brittany Neal <Brittany.Neal@eccgrp.com>
Subject: 2RP-3684 Delineation Requirements

Mike,

I am emailing you after a conversation I had with Heather Patterson last Wednesday, June 22, 2016. We are working on project 2RP-3684 together with WPX Energy.

I understand Heather is on vacation this week and referred me to you with any questions.

Heather and I had discussed the delineation requirement after the second attempt to delineate the area and finding refusal at the restrictive layer. We discussed placing a liner in the areas where chloride exceeded 2,500 mg/Kg at the bedrock or at 4 feet below ground surface. We also discussed sampling a boring in the area of sample locations 010, 011, and 012 where the spill pooled. However, I did not receive this in writing and wanted to be sure we had OCD approval before continuing with the boring, excavation and liner placement.

If OCD grants approval to continue we would like to begin work beginning with the soil boring in the vicinity of 010, 011, and 012 on Wednesday, June 29, 2016.

Thank you for your time.

Sincerely,



Kimberly Huckaba
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