

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Monday, August 22, 2016 12:56 PM
To: 'r@rthicksconsult.com'; Patterson, Heather, EMNRD; Billings, Bradford, EMNRD; Randolph EMNRD Bayliss (Randolph.Bayliss@state.nm.us)
Cc: Gonzalez, Luis; mike@rthicksconsult.com; agroves@slo.state.nm.us
Subject: RE: Clayton Williams - Jenna

RE: Clayton Williams Energy * Jenna Com 1 * 2RP 1816 & 2RP-2458 * DOR: 7/19/13 & 8/17/14

Randall,

Your proposal for remediation of the above referenced releases is **not** approved. OCD will not consider any type of flushing method in an area that falls in a mapped "High" cave/karst area. In addition, as discussed on site, protocol for collection of ground water for sampling was not followed, so the OCD does not accept the data from the 5/5/16 ground water sampling event.

Please provide an alternate method for remediation of this site.

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

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From: Randall Hicks [mailto:r@rthicksconsult.com]
Sent: Sunday, July 17, 2016 7:35 AM
To: Bratcher, Mike, EMNRD; Patterson, Heather, EMNRD
Cc: Gonzalez, Luis; mike@rthicksconsult.com
Subject: Clayton Williams - Jenna

Mike and Heather,

While the deep boring investigation confirmed our conclusions regarding the depth of penetration of salt and the depth to groundwater, the groundwater TDS surprised us.

The boring also documented what was observed in the nearby caliche pit - that the Rustler redbeds lie at a depth of about 20 feet below a Quaternary caliche/silt horizon.

Bottom line – the borings were necessary and should have been done earlier in the process.

Finally – I need to thank Mike Bratcher for suggesting that we grab a sample of groundwater. I was sure that the water would meet standards for protection – and I was wrong. Nearby abandoned supply wells permit a conclusion that water acceptable for stock exists somewhere at depth – but not in the uppermost groundwater zone. That groundwater in

the uppermost zone is >10,000 mg/L TDS is really not consequential with respect to this remedy – but it is very good data to have and it provided me with a good lesson.

Randall Hicks
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