

Incident ID	nAB1504054780
District RP	2RP-2796
Facility ID	30-015-24451
Application ID	pAB1504054655

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Karolina Blaney Title: Environmental Specialist

Signature:  Date: 10-2-18

email: karolina.blaney@wpenergy.com Telephone: 970-589-0743

OCD Only

Received by: Maia Pruett Date: 10/10/18

- Approved
 Approved with Attached Conditions of Approval
 Denied
 Deferral Approved

Signature:  Date: 10/10/18

Denied for following:

1. There is no clear plan for remediation on any of the 3 sites holding the 5 spills. Attachment 1 discusses a prior remediation plan that was denied. The required changes don't appear to be met.
2. No excavation/sampling/remediation appears to be mentioned for 2RP-3195, 2474 & 2796.
3. 2RP-2472 & 2796 are in a High Karst location, therefore these spills are to be remediated to <50' DTW in Table 1 19.15.29.12,NMAC.
4. DTW in this area is at a max of 51'-100'. Two of the closest USGS ground water wells show historical data below 50'. For these releases remediation should be to 51'-100' in Table 1. Future spills on these locations may need drilling confirmation.

5. Due to the amount of time that has past and the high levels of contaminants, current delineation should be done as well. Note the sandy soil type which may suggest more movement over time.
6. The 5 2RP's mentioned are on separate locations. It may be best to re-submit with 2RP-4011 & 3811 to be one one Remediation Plan and 2RP-2472 & 2796 on another, with 2RP-3195 on it's own.