

## Bratcher, Mike, EMNRD

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**From:** Pruett, Maria, EMNRD  
**Sent:** Wednesday, November 14, 2018 4:35 PM  
**To:** Austin Weyant; Heather Patterson; Bratcher, Mike, EMNRD; 'Shelly Tucker'; Griswold, Jim, EMNRD  
**Cc:** Karrigan, Callie N. (MRO)  
**Subject:** RE: 2RP-4840 RE: [EXT] Wabash 20 Fed Com 1H

Hello,

We will need a signed affidavit from the responsible party that no contaminants from the WQCC list will be added to the environment in this process. The list is below.

Jim, Can you confirm this is the complete list?

Please let me know if there is additional info needed.

Best Regards,

*Maria Pruett*

Environmental Specialist  
N.M. Oil Conservation Division  
District 2  
811 S. 1<sup>st</sup> Street  
Artesia, NM 88210  
Desk: 575 748-1283 X 101  
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State of New Mexico WQCC Dissolved Toxicity Constituents under 20.6.2.7(ww) NMAC.

20.6.2.7 DEFINITIONS: Terms defined in the Water Quality Act, but not defined in this part, will have

ww “toxic pollutant” means a water contaminant or combination of water contaminants in concentration(s) which, upon exposure, ingestion, or assimilation either directly from the environment or indirectly by ingestion through food chains, will unreasonably threaten to injure human health, or the health of animals or plants which are commonly hatched, bred, cultivated or protected for use by man for food or economic benefit; as used in this definition injuries to health include death, histopathologic change, clinical symptoms of disease, behavioral abnormalities, genetic mutation, physiological malfunctions or physical deformations in such organisms or their offspring; in order to be considered a toxic pollutant a contaminant must be one or a combination of the potential toxic pollutants listed below and be at a concentration shown by scientific information currently available to the public to have potential for causing one or more of the effects listed above; any water contaminant or combination of the water contaminants in the list below creating a lifetime risk of more than one cancer per 100,000 exposed persons is a toxic pollutant:

- (1) acrolein
- (2) acrylonitrile
- (3) aldrin
- (4) benzene
- (5) benzidine
- (6) carbon tetrachloride
- (7) chlordane

- (8) chlorinated benzenes
  - (a) monochlorobenzene
  - (b) hexachlorobenzene
  - (c) pentachlorobenzene
- (9) 1,2,4,5-tetrachlorobenzene
- (10) chlorinated ethanes
  - (a) 1,2-dichloroethane
  - (b) hexachloroethane
  - (c) 1,1,2,2-tetrachloroethane
  - (d) 1,1,1-trichloroethane
  - (e) 1,1,2-trichloroethane
- (11) chlorinated phenols
  - (a) 2,4-dichlorophenol
  - (b) 2,4,5-trichlorophenol
  - (c) 2,4,6-trichlorophenol
- (12) chloroalkyl ethers
  - (a) bis (2-chloroethyl) ether
  - (b) bis (2-chloroisopropyl) ether
  - (c) bis (chloromethyl) ether
- (13) chloroform
- (14) DDT
- (15) dichlorobenzene
- (16) dichlorobenzidine
- (17) 1,1-dichloroethylene
- (18) dichloropropenes
- (19) dieldrin
- (20) diphenylhydrazine
- (21) endosulfan
- (22) endrin
- (23) ethylbenzene
- (24) halomethanes
  - (a) bromodichloromethane
  - (b) bromomethane
  - (c) chloromethane
  - (d) dichlorodifluoromethane
  - (e) dichloromethane
  - (f) tribromomethane
  - (g) trichlorofluoromethane
- (25) heptachlor
- (26) hexachlorobutadiene
- (27) hexachlorocyclohexane (HCH)
  - (a) alpha-HCH
  - (b) beta-HCH
  - (c) gamma-HCH
  - (d) technical HCH
- (28) hexachlorocyclopentadiene
- (29) high explosives (HE)
  - (a) 2,4-dinitrotoluene (2,4,DNT)
  - (b) 2,6-dinitrotoluene (2,6,DNT)
  - (c) octrahydro-1,3,5,7-tetranitro-1,3,5,7 tetrazocine (HMX)
  - (d) hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX)
  - (e) 2,4,6-trinitrotoluene (TNT)
- (30) isophorone
- (31) methyl tertiary butyl ether
- (32) nitrobenzene
- (33) nitrophenols

- (a) 2,4-dinitro-o-cresol
- (b) dinitrophenols
- (34) nitrosamines
  - (a) N-nitrosodiethylamine
  - (b) N-nitrosodimethylamine
  - (c) N-nitrosodibutylamine
  - (d) N-nitrosodiphenylamine
  - (e) N-nitrosopyrrolidine
- (35) pentachlorophenol
- (36) perchlorate
- (37) phenol
- (38) phthalate esters
  - (a) dibutyl phthalate
  - (b) di-2-ethylhexyl phthalate
  - (c) diethyl phthalate
  - (d) dimethyl phthalate
- (39) polychlorinated biphenyls (PCB's)
- (40) polynuclear aromatic hydrocarbons (PAH)
  - (a) anthracene
  - (b) 3,4-benzofluoranthene
  - (c) benzo (k) fluoranthene
  - (d) fluoranthene
  - (e) fluorene
  - (f) phenanthrene
  - (g) pyrene
- (41) tetrachloroethylene
- (42) toluene
- (43) toxaphene
- (44) trichloroethylene
- (45) vinyl chloride
- (46) xylenes
  - (a) o-xylene
  - (b) m-xylene
  - (c) p-xylene
- (47) 1,1-dichloroethane
- (48) ethylene dibromide (EDB)
- (49) cis-1,2-dichloroethylene
- (50) trans-1,2-dichloroethylene
- (51) naphthalene
- (52) 1-methylnaphthalene
- (53) 2-methylnaphthalene
- (54) benzo-a-pyrene

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**From:** Austin Weyant <austin.veyant@soudermiller.com>

**Sent:** Wednesday, November 14, 2018 2:35 PM

**To:** Pruett, Maria, EMNRD <Maria.Pruett@state.nm.us>; Heather Patterson <heather.patterson@soudermiller.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; 'Shelly Tucker' <stucker@blm.gov>

**Cc:** Karrigan, Callie N. (MRO) <cnkarrigan@marathonoil.com>

**Subject:** RE: 2RP-4840 RE: [EXT] Wabash 20 Fed Com 1H

Ms. Pruett,

Can you clarify point four (4). Do you require a statement that during remediation that no "Toxic pollutant" as defined in 20.6.2WW NMAC will be added to the vadose zone, or do you mean no constituent established in the groundwater Human Health Standards as defined in 20.6.2 NMAC.

Thanks in advance

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**From:** Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>  
**Sent:** Wednesday, November 14, 2018 12:37 PM  
**To:** Heather Patterson <[heather.patterson@soudermiller.com](mailto:heather.patterson@soudermiller.com)>; Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; 'Shelly Tucker' <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Karrigan, Callie N. (MRO) <[cnkarrigan@marathonoil.com](mailto:cnkarrigan@marathonoil.com)>; Austin Weyant <[austin.veyant@soudermiller.com](mailto:austin.veyant@soudermiller.com)>  
**Subject:** 2RP-4840 RE: [EXT] Wabash 20 Fed Com 1H

Hello Ms. Patterson,

OCD has received the Remediation Plan for 2RP-4840, thank you! Please fill in updated C-141 Remediation Plan section and OCD will give conditional approval for the Remediation Plan. Here are the conditions:

1. DTW is determined to be <50' therefore remediation should be to: Chlorides < 600 mg/kg, TPH < 100 mg/kg, BTEX < 50mg/kg and Benzene < 10 mg/kg.
2. The max timeframe for remediation is 180 days.
3. Additional information on the remediation technique including tilling and additives is required.
4. A signed statement from the responsible party affirming that no contaminants from the WQCC list will be added during remediation stage is required.

Please let me know if you have any questions.

Best Regards,

*Maria Pruett*

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**From:** Heather Patterson <[heather.patterson@soudermiller.com](mailto:heather.patterson@soudermiller.com)>  
**Sent:** Friday, October 12, 2018 9:11 AM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Pruett, Maria, EMNRD <[Maria.Pruett@state.nm.us](mailto:Maria.Pruett@state.nm.us)>; 'Shelly Tucker' <[stucker@blm.gov](mailto:stucker@blm.gov)>  
**Cc:** Karrigan, Callie N. (MRO) <[cnkarrigan@marathonoil.com](mailto:cnkarrigan@marathonoil.com)>; Austin Weyant <[austin.veyant@soudermiller.com](mailto:austin.veyant@soudermiller.com)>  
**Subject:** [EXT] Wabash 20 Fed Com 1H

RE: Marathon \* Wabash 20 Fed Com 1H \* 30-015-38568 \* 2RP-4840

Please find the attached work plan for Wabash 20 Fed Com 1H, which is found on private surface.

Thank you,

Heather Patterson  
*Staff Scientist*  
(575) 200-5343 (mobile)



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