Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Friday, March 1, 2019 9:21 AM
To: 'Chris Jones'
Cc: David J. Adkins; Michael Barrett; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Billings, Bradford, EMNRD
Subject: RE: West Red Lake Unit #13 (2RP-5270) 11-19-2018

Chris,

Additional samples will need to be conducted at S-1, S-2, S-3, S-4, and S-10 to meet the 4 feet depth requirement.

Was S-11 the final pooling area for the run-off? Is that area accessible to a truck? Where exactly would the catchment system be placed?

Fresh water would need to be flushed down all 4 spill paths including (S-5, S-6, S-9, and S-11).

Can you please construct a detailed plan and send it to us so that we can make a more informed decision. Please include estimated amounts of fresh water that will be flushed, catchment system materials and design, etc..

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@state.nm.us

From: Chris Jones <cjones@talonlpe.com>
Sent: Friday, March 1, 2019 8:00 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: David J. Adkins <dadkins@talonlpe.com>; Michael Barrett <mbarrett@limerockresources.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: [EXT] 2RP-5270

Robert, thank you for your feedback. In response to your concerns, this area is extremely rocky which makes getting samples difficult and they will most likely have to come from a boring rig. This will not be a problem along the road and on the pad, but because the path of the spill ran down a hillside and into the ravine, getting 4' samples in these paths will not be feasible. What we have done in the past and most recently at the Compton Battery, we can build a sump at the bottom of the ravine where the spill settled and we can flush the spill path with fresh water and hydrogen peroxide mix down the hillside and ravine. We will sample the water that is captured. If levels are still high, we can repeat this process until all levels are satisfactory.

Chris Jones
Project Manager
Office: 575.746.8768
Direct: 575.616.4022
Cell: 575.631.6977
Fax: 575.746.8905
Emergency: 866.742.0742
Web: **www.talonlpe.com**

From: Hamlet, Robert, EMNRD [mailto:Robert.Hamlet@state.nm.us]
Sent: Thursday, February 28, 2019 3:55 PM
To: Chris Jones
Cc: David J. Adkins; Michael Barrett; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Billings, Bradford, EMNRD
Subject: RE: West Red Lake Unit #13 (remediation plan changes needed)

Chris,

There are a couple issues with the remediation plan on the West Red Lake Unit #13. Any spill off the pad needs to be sampled to a depth of 4 feet and replaced with 4 feet of clean material if contamination exits. The entire area is located in high karst and must be treated as if it occurred less than 50 feet to ground water. The OCD currently considers high (and possibly medium) karst areas as "an unstable area" for rule compliance purposes. It is used in this manner in other OCD rules as well (Part 17, Part 34, and possibly others). Below is the relevant portion of the spill rule (Part 29): 19.15.29.12 C.(4)

(4) If a release occurs within the following areas, the responsible party must treat the release as if it occurred less than 50 feet to ground water in Table I of 19.15.29.12 NMAC:
(a) within (i) 300 feet of any continuously flowing watercourse or any other significant watercourse, or (ii) 200 feet of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark); 19.15.29 NMAC 5
(b) within 300 feet from an occupied permanent residence, school, hospital, institution or church;
(c) within (i) 500 feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or (ii) 1000 feet of any fresh water well or spring;
(d) within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to Section 3-27-3 NMSA 1978 as amended, unless the municipality specifically approves;
(e) within 300 feet of a wetland;
(f) within the area overlying a subsurface mine;

(g) within an unstable area;

≤ 50 feet	Chloride***	EPA 300.0 or SM4500 Cl B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

Additional samples will need to be conducted to meet the 4 feet depth requirement. Understandably, there is steep topography/rocky terrain in the delineated area, but a best case effort needs to be made in these areas either through a track hoe, hydro vac equipment, or other options. Please send your remediation plan back after the discussed changes have been accomplished. Also, please address S-2, where the chlorides were 12,400 (mg/kg).

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@state.nm.us

From: Chris Jones <cjones@talonlpe.com>
Sent: Wednesday, February 20, 2019 9:43 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: David J. Adkins <dadkins@talonlpe.com>; Michael Barrett <mbarrett@limerockresources.com>
Subject: [EXT] West Red Lake Unit #13

Mr. Bratcher, on behalf of Lime Rock, we are submitting a work plan for your approval on the West Red Lake Unit #13 remediation. We will proceed as instructed once approved.

Chris Jones
Project Manager
Office: 575.746.8768
Direct: 575.616.4022
Cell: 575.631.6977
Fax: 575.746.8905
Emergency: 866.742.0742
Web: **www.talonlpe.com**