

**Dena**

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**From:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Sent:** Thursday, February 23, 2017 8:29 AM  
**To:** dena@kjenvironmental.com; Yu, Olivia, EMNRD  
**Cc:** Psanders1975@yahoo.com; Aaron.Prefontaine@yorkrsg.com; gregg@kjenvironmental.com; James Fox  
**Subject:** RE: Spill Delineation Report & Remediation Plan- Case Nos. 4497 & 4498

Aloha Dena et al.,

Thank you for your patience and the documentation.

The OCD is currently reviewing the results.  
OCD approves the installation of a well to a minimum of 100' .  
Further approvals and conditions to follow.  
Mahalo  
-Doc

Tomáš 'Doc' Oberding PhD  
Hydrologist, Adv-District 1  
Oil Conservation Division, EMNRD  
(505) 476-3403  
E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)  
一期一会

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.

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**From:** Dena Vandenberg [mailto:dena@kjenvironmental.com]  
**Sent:** Thursday, February 16, 2017 3:04 PM  
**To:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Cc:** Psanders1975@yahoo.com; Aaron.Prefontaine@yorkrsg.com; gregg@kjenvironmental.com; James Fox <james@kjenvironmental.com>  
**Subject:** Spill Delineation Report & Remediation Plan- Case Nos. 4497 & 4498

Good afternoon, Doc!

I hope life is treating you a little better than last time we spoke, and that you have a new person there helping to share the workload!

Attached is the Spill Delineation Report & Remediation Plan for the OWL Spills in Jal. Please note that it includes our preferred plan of action; however, we have considered and prepared alternative options, which can be provided if necessary. We are eager to get this resolved to the satisfaction of the agency.

Please let me know if you have any questions, or require any additional information. Thank you!

**Dena M. Vandenberg, REM, LEED AP**  
**Director of Environmental Services**

## Dena

---

**From:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Sent:** Tuesday, March 7, 2017 1:21 PM  
**To:** dena@kjenvironmental.com  
**Cc:** Psanders1975@yahoo.com; Aaron.Prefontaine@yorkrsg.com; gregg@kjenvironmental.com; James Fox  
**Subject:** RE: Spill Delineation Report & Remediation Plan- Case Nos. 4497 & 4498

Aloha Dena et al,

I want to clarify a bit. The use of soil washing technologies (such as DeSalt) is considered on a case by case basis. Water used for washing must be collected and disposed of properly.

Hope that helps. Please contact me with further questions.

Cheers

-Doc

Tomáš 'Doc' Oberding PhD  
Hydrologist, Adv-District 1  
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**Dena M. Vandenberg, REM, LEED AP**  
**Director of Environmental Services**  
**KJE Environmental & Civil Engineering**  
**500 Moseley Road**

**Dena**

---

**From:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Sent:** Thursday, March 2, 2017 9:06 AM  
**To:** dena@kjenvironmental.com; Yu, Olivia, EMNRD  
**Cc:** Psanders1975@yahoo.com; Aaron.Prefontaine@yorkrsg.com; gregg@kjenvironmental.com; 'James Fox'  
**Subject:** RE: Spill Delineation Report & Remediation Plan- Case Nos. 4497 & 4498

Aloha Dena et al,

Thank you for the patience.

The OCD approves the plan as presented. The OCD would like everyone to consider that a well may not be necessary. The OCD would recommend several boring at the highest contamination areas that proceed 10' below the lowest extent of contamination (use of field samples to guide depth is recommended). A laboratory sample from the deepest extent is requested.

Backfill with clean soil and reseeding is to be included in this remediation.

Please let me know if you have any questions.

Mahalo

-Doc

Tomáš 'Doc' Oberding PhD  
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**From:** Dena Vandenberg [mailto:[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)]  
**Sent:** Thursday, February 23, 2017 7:33 AM  
**To:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** Psanders1975@yahoo.com; Aaron.Prefontaine@yorkrsg.com; gregg@kjenvironmental.com; 'James Fox' <james@kjenvironmental.com>  
**Subject:** RE: Spill Delineation Report & Remediation Plan- Case Nos. 4497 & 4498

Thanks so much, Doc! It was nice talking to you!

**Dena M. Vandenberg, REM, LEED AP**  
**Director of Environmental Services**  
**KJE Environmental & Civil Engineering**  
**500 Moseley Road**  
**Cross Roads, Texas 76227**  
**Ph: 940-387-0805**  
**Fx: 940-387-0830**

Cell: 214-364-7627



TBPE# F-12214



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**To:** [dena@kjenvironmental.com](mailto:dena@kjenvironmental.com); Yu, Olivia, EMNRD  
**Cc:** [Psanders1975@yahoo.com](mailto:Psanders1975@yahoo.com); [Aaron.Prefontaine@yorkrsg.com](mailto:Aaron.Prefontaine@yorkrsg.com); [gregg@kjenvironmental.com](mailto:gregg@kjenvironmental.com); James Fox  
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**Cc:** [Psanders1975@yahoo.com](mailto:Psanders1975@yahoo.com); [Aaron.Prefontaine@yorkrsg.com](mailto:Aaron.Prefontaine@yorkrsg.com); [gregg@kjenvironmental.com](mailto:gregg@kjenvironmental.com); James Fox <[james@kjenvironmental.com](mailto:james@kjenvironmental.com)>  
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Good afternoon, Doc!

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**TBPE# F-12214**



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**From:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Sent:** Tuesday, March 28, 2017 12:46 PM  
**To:** dena@kjenvironmental.com  
**Subject:** RE: Conference Call

Blended soils have to be tested every 20yds<sup>3</sup>, and desalt has to have all liquids disposed of properly, no flushing vertically.

Will try to call this afternoon.

Thanks

Tomáš 'Doc' Oberding PhD  
Hydrologist, Adv-District 1  
Oil Conservation Division, EMNRD  
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**From:** Dena Vandenberg [mailto:[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)]  
**Sent:** Tuesday, March 28, 2017 9:05 AM  
**To:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Cc:** Kevin Ware <[kevin@kjenvironmental.com](mailto:kevin@kjenvironmental.com)>  
**Subject:** RE: Conference Call

Yes- we want to get started Thursday or Friday, if possible. As you know, the insurance company prefers DeSalt, but OWL prefers blending. We are sending in an addendum to our Remediation Plan for the blending, but ran into some details we need to get ironed out and wanted to run them by you before we submit the Addendum.



**DENA M. VANDENBERG, REM, LEED AP**  
***Director of Environmental Services***  
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**From:** Oberding, Tomas, EMNRD [mailto:[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)]  
**Sent:** Tuesday, March 28, 2017 10:01 AM  
**To:** [dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)  
**Subject:** RE: Conference Call

Sometime later this week?

What is the snafu...?

Tomáš 'Doc' Oberding PhD

Hydrologist, Adv-District 1  
Oil Conservation Division, EMNRD  
(505) 476-3403  
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**From:** Dena Vandenberg [<mailto:dena@kjenvironmental.com>]  
**Sent:** Tuesday, March 28, 2017 8:43 AM  
**To:** Oberding, Tomas, EMNRD <[Tomas.Oberding@state.nm.us](mailto:Tomas.Oberding@state.nm.us)>  
**Cc:** Kevin Ware <[kevin@kjenvironmental.com](mailto:kevin@kjenvironmental.com)>  
**Subject:** Conference Call

Good morning, Doc!

Are you available today for a conference call to discuss the OWL remediation? We are trying to get this thing rolling again this week. Please let me know what time works best for you. Thank you!



**DENA M. VANDENBERG, REM, LEED AP**  
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**From:** Dena Vandenberg <dena@kjenvironmental.com>  
**Sent:** Tuesday, March 28, 2017 3:52 PM  
**To:** 'Oberding, Tomas, EMNRD'  
**Cc:** Kevin Ware  
**Subject:** RE: Conference Call

Good afternoon, Doc!

To provide a quick update, we completed the two borings (one in each of the spill areas) to a depth of 10 feet beyond the deepest impacted soil and did not encounter groundwater. We collected soil samples from the bottom of each hole and the lab results indicated no exceedances of state action levels.

In case you're not available to call, the most pertinent questions are:

- 1) You mentioned the cleanup needed to be completed to Landfarm standards, per Title 19, Chapter 15, Part 26.15. According to that regulation, "Chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg if the landfarm is located where groundwater is less than 100 feet but at least 50 feet below the lowest elevation at which the operator will place oilfield waste **or 1,000 mg/kg if the landfarm is located where groundwater is 100 feet or more below the lowest elevation at which the operator will place oilfield waste**"

Since all available information indicates that groundwater is more than 100 feet below the deepest impacted soils, we have interpreted this to mean the 1,000 mg/kg is the standard we will be held to for the blending. We would, of course, still lay the poly at 4' to prevent wick-up of higher levels of chlorides. Could you please confirm that the agency will accept this clean-up standard?

- 2) We have run blending calculations, and it appears that if we collect one sample for every 20 cubic yards of soil, we will be collecting approximately 4,000 samples. OWL has asked if there might be a variance to reduce the required amount of samples to one per every 100 cubic yard.
- 3) OWL would like to begin remediation efforts as soon as possible, as they have equipment rented and on-site and we are entering the rainy season. They have asked if they can begin this Friday (3/31) with excavation of the areas we discussed which exceed 600 ppm within 0-4', then place the affected soil on poly, and line the excavation at 4' with poly. They will wait for submittal of our Remediation Plan Amendment and formal approval prior to beginning blending.

We really appreciate your help and hope to talk to you soon!



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