From:	Yu, Olivia, EMNRD
To:	"zach.robbins@rxsoil.solutions"; "Lynn III,John R"
Cc:	stan.mickle@rxsoil.solutions; "Jace Caraway"; Billings, Bradford, EMNRD
Subject:	RE: 1RP-4723 Work Plan - RXSoil
Date:	Monday, April 23, 2018 4:49:00 PM

Messrs. Lynn & Robbins:

Thank you for your reminders and patience.

Notes:

- As previously mentioned, any document and email communications with NMOCD is not confidential nor proprietary, especially not on a proposed plan, necessitating approval and online documentation.
- NMOCD requests that the volume of water used and measured dimensions of the treatment area be provided in the subsequent report.
- NMOCD requests at least 2 weekdays of advance notice before remedial activities commence to allow witnessing opportunities.

NMOCD will grant approval to the proposed remediation plan for 1RP-4723 with the below stipulations/modifications:

- The eastern edge of the treatment area appears to within 1000 ft. of a playa lake, a waterbody of NM. Please ensure that all borders of the treatment area is at least 1000 ft. away. Aerial imagery from Google Earth, in 2014, at the beginning of the current drought period, depicts the playa boundary most clearly.
- Where was SB-14 from January 3, 2018 sample date located?
- Depending on the location of SB-14, NMOCD recommends that the treatment area be located over/in vicinity of either SB-10 or SB-14 areas. Both of these areas have elevated chlorides at depths beyond 10 ft. bgs. Since the top 4 ft. will be removed for backfilling of the release area and delineation data demonstrated clean for TPH and chlorides, these areas would be optimal to stage the treatment area. In a conventional remediation plan, these areas likely would have been excavated to emplace a liner at 4 ft. bgs before putting the clean soil back on top.
- Bottom and sidewall confirmation samples are required for each of the areas with differing depths of excavation. Each set of confirmation sidewalls at 50 ft. interval must be submitted for laboratory analyses. If the proposed depth of excavation changes at less than 50 ft. distance, confirmation samples are still required. For example, the edges of the areas represented by S-11/SB-6; S-14/SB-7; S-12/SB-8.
- Please be advised that if the edges of the currently identified footprint of the impacted area are not within permissible levels, proceed to remove soil laterally. In other words, all confirmation sidewall samples must demonstrate <= 600 mg/kg chlorides.
- Please note that as SB-11 represents deeper vertical delineation for S-2 to S-5, the likely depth of excavation is 4 ft.
- Based on delineation data, the area represented by S-1/SB-1 will need to be lined with at least a 20 mil liner. Lined areas must be clearly demarcated on an appropriately scaled map and GPS coordinates provided.
- Delineation sample locations that demonstrated TPH extended must be tested in

confirmation samples. Select representative bottom and sidewall samples must be tested for BTEX as well since these were not tested during delineation. NMOCD recommends these sample locations be on the well pad as having the highest probability of impact. Please remember to follow standard sampling methodology.

- As the proposed remediation plan is in situ, all soil samples must be tested using EPA Method 300. Provide all corresponding data from field tests.
- Tabulate GPS coordinates for all confirmation sample locations and the dimensions of the in situ soil remediation area.
- Remediated soil must be tested at every 50 cubic yards, not 100 cubic yards. Discrete samples only. What is the sampling methodology? Grid or a scatter of depths?
- In order to verify that the remediated soil, remaining in situ will not cause long-term adverse effects on the soil, groundwater, and potentially surface water (playa), NMOCD requests the following soil parameters tested prior to disturbance of the treatment area and after application of the treatment: SAR, ESP, CEC, and pH. Optimally, include nitrate-N and sulfate as well as hydraulic conductivity for a more complete assessment.

Please confirm or inform for clarifications, preferably written.

Thanks,

Olivia Yu
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From: zach.robbins@rxsoil.solutions <zach.robbins@rxsoil.solutions>
Sent: Monday, March 26, 2018 8:27 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: stan.mickle@rxsoil.solutions; 'Jace Caraway' <jace.caraway@rxsoil.solutions>; 'Lynn III,John R' <JLYNNIII@travelers.com>
Subject: 1RP-4723 Work Plan - RXSoil

Ms. Yu,

Attached is the RXSoil work plan for remediation of the release at Pogo East Caprock SWD #005. We look forward to hearing back.

Thanks,
Zach

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