

From: [Billings, Bradford, EMNRD](#)
To: ["Katie Jones"](#); ["Edward Hansen"](#); [Yu, Olivia, EMNRD](#); [Hernandez, Christina, EMNRD](#)
Subject: CAP and Soil Closure Request for ROC BD-SWD System, BD L-36 EOL (1R 426-278)
Date: Wednesday, June 20, 2018 1:21:00 PM

June 20, 2018

Katie Jones – ROC
Ed Hansen – Basin

Re: Corrective Action Plan (CAP) and Soil Closure Request for ROC-BD SWD System, BD L-36 EOL (1R 426-278)

Following submitted report, data review and discussions, the following:

As has been mentioned, this is not a typical CAP and is considered to be a work plan for ground water delineation. Also, as has been noted in other Oil Conservation Division (OCD) responses recently, please be sure and include extended range (GRO, DRO and MRO) for TPH analysis.

OCD agrees that required soil remediation work based on previous approvals has been met and as such no additional soil remediation is required. This does not mean site/location is closed.

OCD also approves the nominal ground water investigation plan with the following conditions:

1. Please insure that top of casing for monitor wells is surveyed to the nearest 100th of a foot.
2. Monitor wells will be placed as per State Engineer protocol. OCD prefers, at minimum, that ten (10) feet of screen be placed into water table and five foot of screen be located above air/water interface. OCD can discuss this with ROC/Basin if needed. Ground water to be sampled for Chloride, and at least initially for BTEX, benzene and TPH.
3. OCD requests that proposed monitor well identified as MW-1 be located as near as practicable to the ESE edge of the larger soil excavation area. In general, moving the proposed location to the East to as near the edge of previous soil excavation as can be done.

OCD appreciates all efforts to this time by ROC and Basin for this circumstance.

If there are any questions please contact this office.

Please keep this electronic communication as NO paper copy will follow.

Sincerely,

Bradford Billings
EMNRD/OCD

Santa Fe

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.