Mr. Soderstrom:

To follow-up on our phone conversation this morning,

- 1. NMOCD uses a combination of USGS and NMOSE data for assessment to groundwater. Both provide important and complementary data for depth to groundwater and water table.
- 2. Due to the release volume, flowpath and topography, NMOCD requires at least 2 soil bores drilled down to greater than 50 ft. bgs: one at the release point and one at the end of the release path.
- 3. Please remember to include soil bore logs and photo documentation of activities.
- 4. BLM approval and any stipulations must be received before commencement of release characterization and remedial activities.

Thanks, Olivia

From: Yu, Olivia, EMNRD

Sent: Monday, September 10, 2018 2:30 PM

To: 'Will Soderstrom' <will@kjenvironmental.com>; yjimenez@blm.gov

Cc: Dena <dena@kjenvironmental.com>; psanders@oilfieldwaterlogistics.com; Hernandez,

Christina, EMNRD <Christina.Hernandez@state.nm.us>

Subject: RE: Case No. 1RP-5106 - Unit Letter G, Section 25, T25S, R36E Lea County, New Mexico

Mr. Soderstrom:

NMOCD databases indicate the entire release path occurred on Federal minerals ownership. BLM can verify. If yes, then BLM must be included in all communications and report submittals.

NMOCD will approve of the proposed delineation plan for 1RP-5106 with several clarifications.

- 1. Which USGS well with 2017 data was used for depth to groundwater assessment? None of the USGS wells, within a 2000 m or a 1 mile radius of the release point or the end point, have depth to groundwater data more recent than 1991.
- 2. As all 3 USGS wells within a 1 mile radius represent 3 different aquifers, NMOCD would require verification that there was no impact to shallow groundwater. Therefore, for verification, a soil bore will need to be drilled to at least 50 ft. bgs or until groundwater is anticipated. USGS well (320644103134401) has depth to groundwater estimated at 54 ft. bgs in 1953 in the Alluvium, Bolsom Deposit aquifer. While the well with the most recent data in 1991, USGS well (320611103133901) has depth to groundwater estimated at 217 ft. bgs, this well was completed into the Chinle Formation aquifer.

Please confirm or contact for clarification.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 575-393-6161 x113

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.

From: Will Soderstrom <<u>will@kjenvironmental.com</u>>
Sent: Thursday, August 16, 2018 3:32 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Dena <<u>dena@kjenvironmental.com</u>>; <u>psanders@oilfieldwaterlogistics.com</u>
Subject: Case No. 1RP-5106 - Unit Letter G, Section 25, T25S, R36E Lea County, New Mexico

Ms. Yu,

Please see attached work plan for the characterization of impacts for Case No. 1RP-5106 in Lea County, New Mexico.

If you require additional information or have any questions, please don't hesitate to ask questions.

Thank you,



<u>WILLIAM SODERSTROM</u> *Environmental Project Manager* 500 Moseley Rd Cross Roads, TX 76227 M (405)258-8623 O (940)387-0805 F (940)387-0830