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To: [Bratcher, Mike, EMNRD](#); [Patterson, Heather, EMNRD](#); [Randy Pair](#)
Cc: [Camille J. Bryant](#); [Bobby Blackwood](#); sjwalters@basinenv.com
Subject: Palladium 7-1 4-Inch Poly (2RP-3018)
Date: Thursday, July 02, 2015 10:29:55 AM

All,

As we discussed in our conference call yesterday, the Palladium 7-1 4-Inch Poly release site (2RP-3018) has been excavated horizontally and vertically to the extent practicable, in accordance with the *Environmental Site Summary & Spill Remediation Plan* dated 5/8/2015. The north, south, and west walls of the excavation have been advanced an additional 4 feet to create a buffer zone around the maximum horizontal extent of impacted soil. The floor of the excavation will now be fitted with a 20-mil, impermeable, polyethylene liner at approximately 10 feet bgs. A cushion of sand will be installed approximately 6 inches both above and below the liner to protect it during installation and backfilling activities. The liner will extend horizontally into the buffer zone and be sloped to facilitate shedding of moisture outside the footprint of the excavation. The liner will also extend vertically approximately 3 to 4 feet along the eastern extent of the excavation, as excavation of this area was limited by the presence of an 8-inch, steel natural gas pipeline owned by Regency Energy Partners. This engineered control will serve to inhibit vertical migration of contaminants left in-situ both upward to the vegetative zone and downward to the underlying groundwater.

Since we were unable to achieve vertical delineation in trench TT-1, a section of 8-inch PVC conduit will be installed near the release point to allow advancement of a soil boring (SB-1) through the liner at a later date. The riser will be fitted with a chemically welded, 40-mil boot to preserve the integrity and impermeability of the liner. Following installation of the liner and conduit, the excavation will be backfilled with locally acquired, non-impacted material, compacted, and contoured to fit the surrounding topography.

Following backfilling, a delineation trench will be advanced to the east of the Regency pipeline to investigate the vertical and horizontal extent of impacted soil in that area. The trench will be advanced at 1- to 2-foot vertical intervals until PID field-screens and/or olfactory and visual senses suggest contaminants of concern are below the NMOCD recommended remediation action levels established for the site, or to the extent practicable.

Upon completion of the proposed corrective actions, a *Remediation Summary & Risk-Based Site Closure Request* will be submitted to the NMOCD and BLM, documenting remediation activities and results of confirmation soil samples.

The disturbed area will be seeded with a BLM-approved seed mix at a time conducive to germination.

If you have any questions, comments, or concerns, please do not hesitate to contact me by telephone or email.

Respectfully,
Ben J. Arguijo
