Bratcher, Mike, EMNRD

From: Green, Matthew <MGreen@trcsolutions.com>
Sent: Thursday, May 12, 2016 6:54 AM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD; Tucker, Shelly
Subject: RE: Legacy Low Pressure Line Release (2RP-3526)

Mike,

I wanted to check in with you and see if you have had time to review to review over my plan and if you had any thoughts on it. Let me know if you need any other information or if there is anything I am missing. I appreciate your help on this, I am a little new to New Mexico regulations and I want to make sure I am handling things properly.

Regards,

Matt Green
Senior Project Manager

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From: Green, Matthew
Sent: Thursday, May 05, 2016 7:10 PM
To: 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>
Cc: Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: Legacy Low Pressure Line Release (2RP-3526)

Mike,

Sorry for not getting back with you sooner I have been out in the field for most of the day today and all of yesterday. I tried to track down that map but the person that pulled those samples is no long with Anadarko and there seems to be no record of where he sampled. Apparently the Anadarko person that collected the samples was also under the impression that condensate releases were exempt from chloride sampling so that would explain the lack of a chloride sample in the initial sampling event. I have since explained that they need to be collecting chloride samples to their new personal so I hope we can avoid that in the future.

I spoke to Shelly the same day I had initially spoken to you, but I have attached the Table 2 to this email so she will have all the data to review as well. After reviewing my Table 1 I sent with the original email I realized I did not have the proper sample depths I have attached a updated table and lab report for review as well. I had originally planned to temporarily stockpile impacted soil on plastic on Anadarko's pipeline ROW but if we need to go outside of that area I will make sure to run that by the BLM first.

I would agree with the proposal to dispose of the highly impacted material at a permitted disposal. I propose excavating down to a maximum of three feet where the delineation samples were collected, and disposing of that material. Any excavation on the road surface exceeding six inches will be backfilled with clean material immediately. Once initial

excavation activities are complete bottom hole and sidewall samples will be collected to determine if any additional excavation so necessary. If further excavation is necessary, I would propose if any further excavation is needed, impacted material will be temporarily stockpiling on plastic and a composite sample(s) will be collected to determine impact. If the concentrations are below acceptable OCD limits stockpiled material would be used to backfill the excavation. If concentrations are above acceptable OCD limits soil will be disposed of as well. All soil that is disposed of will be and replacing with clean material. Let me know your thoughts and if you have any questions please let me know.

Regards,

Matt Green
Senior Project Manager

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From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Wednesday, May 04, 2016 11:38 AM
To: Green, Matthew <MGreen@trcsolutions.com>
Cc: Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us>; Tucker, Shelly <stucker@blm.gov>
Subject: RE: Legacy Low Pressure Line Release (2RP-3526)

Matt,

A site map of the initial sample event would be helpful, however, based on what I can see so far, OCD does request the highly impacted soils from this release be excavated immediately. Of particular concern regarding the data from Table 2, is SB2 0-6 IN, SB3 0-12 IN (and possibly deeper), SB4 0-12 IN (and possibly deeper), SP1 (depth unknown), and SP2 (depth unknown). OCD would prefer this highly impacted material be taken to a permitted disposal. Blending and replacing this soil is not an option, and is not approved. OCD notes that no chloride samples were taken in this initial sample event. If excavation of the lease road/roads is required, you will likely need to have clean backfill ready at the time of excavation to prevent shutting the road down any longer than possible. There is a caliche pit just north of the release site, but I am not sure who the ownership is. OCD may consider a proposal for bioremediation, but it would need to be in a lined, heavily bermed area, and would take some time. This would require some surface disturbance, which, again, will require BLM approval, as surface owner. I am copying Shelly Tucker w/BLM on this correspondence and if Shelly is the BLM rep for this area, she will need the data provided. If she is not the rep, she can advise who is. This may be a ROW issue for them.

Shelly: Lat/Long is 32.005116 103.947281 I believe the legals are P-26-26s-29e. I have most of the data imaged to 2RP-3526 now, and will go ahead and get the rest in there shortly. Here is a link to that file:

http://ocdimage.emnrd.state.nm.us/imaging/AEOrderFileView.aspx?appNo=pAB1602957083

Mike Bratcher
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From: Green, Matthew [mailto:MGreen@trcsolutions.com]
Sent: Tuesday, May 03, 2016 5:14 PM
To: Bratcher, Mike, EMNRD
Cc: Patterson, Heather, EMNRD
Subject: RE: Legacy Low Pressure Line Release (2RP-3526)

Mike,

We have not excavated any of the impacted soil yet. I wanted to delineate and get work plan approval first before we started. An Anadarko representative collected initial samples from the surface down to approximately one (1) foot below ground surface at the release which indicated TPH, BTEX, and benzene concentrations were above regulatory limits. I have attached the table summarizing the laboratory analytical results. I did not include the sample results in my initial email because we were never provided a sample location map and are unsure where they were collected in relation to the samples collected by TRC. When TRC delineated the release, soil samples were collected at three (3) feet below ground surface based on olfactory and visual indicators.

Once the impacted soil is excavated, TRC will collect a composite soil sample from the stockpiled soil to determine TPH, BTEX, and chloride concentrations. Once we determine our concentrations, we can discuss remediation options and go from there. Let me know if you have any questions or if there is anything else you think we are missing.

Regards,

Matt Green
Senior Project Manager

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From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Tuesday, May 03, 2016 8:00 AM
To: Green, Matthew <MGreen@trcsolutions.com>
Cc: Patterson, Heather, EMNRD <Heather.Patterson@state.nm.us>
Subject: RE: Legacy Low Pressure Line Release (2RP-3526)

Matt,

Has any of the impacted material been excavated yet? I will need to know what level of contamination exists in the surface to 3' interval to evaluate your proposal. Typically, OCD does not approve a "blend only" method of remediation. All that does is manipulate the data with no real removal of contaminants. Being a condensate release, there may be other options to a dig and haul, but I will need more information as to what is there. Also, being a federal site, it will require BLM approval as well. I will be in the field some this morning but let me know what you have available and I will get back with you as soon as possible.

Thanks,

Mike Bratcher

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From: Green, Matthew [mailto:MGreen@trcsolutions.com]
Sent: Monday, May 02, 2016 1:39 PM
To: Bratcher, Mike, EMNRD
Subject: Legacy Low Pressure Line Release (2RP-3526)

Mike,

As per our conversation earlier, TRC is conducting the remediation work for Anadarko on the Legacy Low Pressure Line Release. Attached is a copy of the delineation sample results table, location maps, and the C-141 for the release. The release was a 15 barrel natural gas condensate release which occurred on January 14, 2016. The release was reported to the NMOCD on January 29, 2016 and was assigned the release number 2RP-3526. The NMOCD guidelines indicate the Legacy Low Pressure Line Release has a ranking score of twenty (20). TRC collected delineation samples on 3-24-16 to determine the extent of the soil impact and, based on laboratory results, all collected samples were below NMOCD regulatory limits for TPH with the exception of Sample-2 @ 3FT (Table 1 attached). Laboratory analytical results indicated that all collected delineation samples with the exception of Sample-6 @3FT were above NMOCD limits for chlorides. TRC proposes excavating the impacted soil off of the road surface to a depth of approximately five (5) feet, scraping eight (8) inches from the road surface and remediating the excavated soil utilizing mixing and blending techniques. Following excavation activities, confirmation soil samples will be collected from the floor and sidewalls of the excavated area to confirm impacted soil has been brought to surface. Once laboratory analytical results indicate all confirmation soil samples are below NMOCD regulatory limits and with NMOCD approval, the excavation will be backfilled with the remediated stockpiled soil. On completion of backfilling activities the impacted area was contoured to fit the surrounding topography. A final closure report will be submitted to the NMOCD following backfilling and contouring activities. Let me know if there is anything else that will be required or if you have any questions.

Regards,

Matt Green
Senior Project Manager

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