

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, June 1, 2017 6:58 AM  
**To:** Lowry, Joel W; Pair, Randal (rpair@blm.gov)  
**Cc:** Camille Bryant2; Yolanda Jordan; Weaver, Crystal, EMNRD  
**Subject:** RE: 1RP- 2504 - Permission to Excavate and Backfill affected portion of Ramp

RE: Plains Marketing \* Former Maljamar Station \* **2RP-2504**

Joel,

OCD concurs with BLM approval, and conditions of approval, for this proposal.

If you have any questions or concerns, please contact me.

Mike Bratcher  
NMOCD District 2  
811 S. First St.  
Artesia NM 88210  
575-748-1283 Ext 108  
mike.bratcher@state.nm.us

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:** Pair, Randal [mailto:rpair@blm.gov]  
**Sent:** Wednesday, May 31, 2017 3:44 PM  
**To:** Lowry, Joel W <Joel.Lowry@terracon.com>  
**Cc:** Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Camille Bryant2 <cjbryant@paalp.com>; Yolanda Jordan <yjordan@blm.gov>  
**Subject:** Re: 1RP- 2504 - Permission to Excavate and Backfill affected portion of Ramp

To confirm our phone conversation this afternoon; BLM generally agrees with the proposal. In bullet number one ["The excavation will be advanced horizontally until field observations suggests soil affected above the NMOCD RRAL has been mitigated"], I noted that BLM wants a few wall confirmation samples, in addition to the floor confirmation sample noted in Bullet 3. I further noted that BLM agrees to backfilling with remediated material immediately following collection of confirmation samples, with the understanding that if lab analysis of the confirmation samples shows exceedance of the RRAL levels, removal of the backfill and additional excavation of in-place contaminated material will be required. BLM reviewed this very quickly, based upon your representation that quick action was necessary to further work on the project.

Randal "Randy" Pair  
Envir. Protection Specialist - Realty Compliance  
office: 575.234.6240  
cell: 575.361.0062  
email: [rpair@blm.gov](mailto:rpair@blm.gov)

On Wed, May 31, 2017 at 9:16 AM, Lowry, Joel W <[Joel.Lowry@terracon.com](mailto:Joel.Lowry@terracon.com)> wrote:

Mike and Randy,

This email has been prepared to request NMOCD and BLM permission to excavate and backfill an affected area within the western entrance ramp into Section A at Maljamar Station (1RP-2504). During the installation and continued use of the ramp, an affected area measuring approximately 200 sq. ft. was identified near the base of the ramp within the southeast corner of Sec. B. Upon identifying the affected area limited excavation activities were conducted and one (1) soil sample (Ramp Stain @ 9') was collected from the current grade of the excavation along with one (1) delineation soil sample (Ramp Stain TT @ 18') from soil beneath the affected area. The collected soil samples were submitted to the laboratory for analysis of TPH concentrations. Verbal results from the laboratory indicate that the TPH concentration of soil sample Ramp Stain @ 9' is approximately 8,500 mg/kg. The TPH concentration for soil sample Ramp Stain TT @ 18' is approximately 75 mg/kg.

On behalf of Plains Marketing, Terracon requests NMOCD and BLM permission to conduct the following field activities:

- \* Excavate the affected area represented by soil sample Ramp Stain @ 9'. The excavation will be advanced to a depth of approximately 18 ft. bgs, or until confirmation soil samples indicated soil is not affected above the NMOCD RRAL. The excavation will be advanced horizontally until field observations suggests soil affected above the NMOCD RRAL has been mitigated.
- \* Excavated soil will be placed into the existing spoils pile before it is crushed, segregated into approximate 500 cy stockpiles and sampled.
- \* Collect one (1) confirmation soil sample (Ramp Stain Floor @ 18') from the base of the excavated area and submit it to the laboratory for analysis of BTEX, TPH and chloride.
- \* Upon collecting the necessary confirmation soil sample, the excavated area will be backfilled with stockpiled soil represented by soil sample (5/11) Sec. A Stockpile #1, which exhibits BTEX, TPH and chloride concentrations that are below the NMOCD RRAL.

Upon completion of the aforementioned field activities and receipt of laboratory analytical results from the remaining confirmation soil samples collected from the site, Plains will prepare a Permission to Backfill Letter requesting NMOCD and BLM permission to backfill the remaining environmental excavation associated with the road crossing and Section A. The timely remediation of the affected area within the western access ramp will limit the amount of time access to Section A is restricted and should allow for the preparation of an all-encompassing Permission to Backfill Letter upon receipt of laboratory analytical results from the remaining confirmation soil samples. Please see the attached laboratory analytical report for soil sample (5/11) Sec. A Stockpile #1, a current "Sample Location Map" and several photographs of the subject area. The focus of this correspondence is on the affected area within the western access ramp. Laboratory analytical results from the remaining confirmation soil samples is not yet available. If you have any questions or need any additional information, please feel free to contact Camille Bryant or myself by phone or email. Thanks!

Respectfully,

Joel Lowry

Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

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