

Bratcher, Mike, EMNRD

From: Stanley, Curtis D. <CDStanley@trcsolutions.com>
Sent: Thursday, October 5, 2017 7:42 AM
To: Bratcher, Mike, EMNRD; Tucker, Shelly; Weaver, Crystal, EMNRD
Cc: 'Camille J Bryant'
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)
Attachments: Screech Owl Table.pdf; Figure 2b Site Layout-Layout1.pdf

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703
T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]
Sent: Thursday, September 14, 2017 10:18 AM
To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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: Stanley, Curtis D. [mailto:CDStanley@trcsolutions.com]
Sent: Tuesday, September 5, 2017 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E
2RP-4147
32.039556° 104.232184°
ULT K, Section 18, Township 26 South, Range 27 East NMPM
Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg

3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



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