

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Friday, January 5, 2018 8:38 AM
To: Green, Nikki; agroves@SLO.state.nm.us
Cc: Weaver, Crystal, EMNRD; Rebecca Haskell (RHaskell@concho.com); Sheldon Hitchcock; Dakota Neel
Subject: RE: 2RP-3974 SRO State Com #064H - Proposed Email to Request Backfill

RE: COG * SRO St COM 64H * **2RP-3974** * DOR: 10/28/16

Nikki,

Sorry for the delay. I have been out for the Holidays. Your request to backfill at the above referenced location is approved. It is OCD's understanding that COG will request a deferral for currently inaccessible impacted soils.

Thank you,

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: Green, Nikki [mailto:NGreen@trcsolutions.com]
Sent: Monday, December 18, 2017 1:57 PM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; agroves@SLO.state.nm.us
Cc: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Rebecca Haskell (RHaskell@concho.com) <RHaskell@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>
Subject: 2RP-3974 SRO State Com #064H - Proposed Email to Request Backfill

Good Afternoon Mr. Bratcher and Ms. Groves,

Please find attached a Site Details and Confirmation Soil Sample Locations Map and a Table which summarizes the laboratory analytical results of samples collected at the Release Site. Based on the laboratory analytical results, all impacted soil has been excavated, with the exception of the area represented by soil sample EW-2 2'. Approximately one (1) foot east of the east wall of the excavation, the plastic lined secondary containment and associated tank battery equipment are located at surface within the containment. Due to the location of the lined secondary containment and safety concerns, additional excavation activities cannot be performed on the east wall of the excavation represented by soil sample EW-2 2'.

Based on the laboratory results and safety concerns, TRC, on behalf of COG, request OCD and NMSLO approval to backfill the excavated area with non-impacted soil. The impacted soil beneath the lined secondary containment will be remediated at the time of abandonment of the tank battery.

Following backfill activities, a Risk Based Closure Request will be submitted.

Thank you,

Nikki Green
Project Manager



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