

## Venegas, Victoria, EMNRD

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**From:** Stoffel, Jared <JStoffel@trccompanies.com>  
**Sent:** Monday, April 15, 2019 2:16 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Venegas, Victoria, EMNRD; Hamlet, Robert, EMNRD; Ike Tavarez; Rebecca Haskell  
**Subject:** [EXT] FW: Urgent: (2RP-5198) Alternate Sampling Plan for At-Risk Remediation at Carmen 3 Federal Com #1H  
**Attachments:** Carmen Federal #1 - Figure 3 (Delineation).pdf; Carmen Federal #1 - Delineation Chem Table.pdf; Carmen Federal #1 Sample Distribution Map.pdf

Attached is a re-submittal of the proposed alternative sampling plan for your review, as we discussed this afternoon. Please let me know if we can do anything else to help the process along, and I will be happy to do so. Thank you very much!

**Jared Stoffel, P.G.**  
Staff Geologist



10 Desta Dr STE 150E, Midland, TX 79703  
T: 432 520 7720 | F: 432 520 7701 | C: 432 238 3003  
[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

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Mr. Bratcher,

I apologize for my lack of clarity in my message. Please accept this listing of site parameters and proposed sampling methodology and frequency:

- Groundwater at the site, based on the trend map, is greater than 350 ft. from ground surface. The NMOSE report did not have any wells listed within the area.
- The release impacted the production pad and a limited area of pastureland to the southwest.
- The release has been horizontally and vertically delineated to the least stringent NMOCD regulatory guidelines on the pad and the most stringent NMOCD regulatory guidelines in the pasture area. Please see the attached delineation map and analytical table for reference.
- The remediation activities will be performed "at risk" on the behalf of COG
- Per 19.15.29.12.D(b), we are submitting a composite and grab sample plan for the NMOCD's review and approval.
  - We propose to collect twenty-one (21) confirmations soil samples from the floor of the excavation, all of which will be five point composite samples. Additionally, we propose to collect fifteen (15) confirmation soil samples from the sidewalls of the excavation, all of which will be five point composite samples.
  - In total, the thirty-six (36) soil samples will be representative of less than 800 square feet per composite soil sample over the 27,250 square foot release area.
  - Also attached is a map of the approximate locations of the proposed confirmation composite samples
- We plan on collecting confirmation samples as the excavation progresses.
- The project is expected to take approximately twenty (20) working days, and is expected to conclude on or around April 17, 2019.

Please let me know if the Alternate Sampling Plan is acceptable to you. If you need any further information or have any questions please let me know. Thank you.

Jared Stoffel, P.G.  
Staff Geologist



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[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)

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**From:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Sent:** Wednesday, March 20, 2019 5:10 PM  
**To:** Stoffel, Jared <[JStoffel@trcsolutions.com](mailto:JStoffel@trcsolutions.com)>  
**Cc:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Cooper, Brian <[BCooper@trcsolutions.com](mailto:BCooper@trcsolutions.com)>  
**Subject:** RE: Urgent: (2RP-5198) Alternate Sampling Plan for At-Risk Remediation at Carmen 3 Federal Com #1H

RE: Holly Frontier LLC \* 2RP-5198 \* Transport related release to COG location – Carmen 3 Fed Com 1H \* DOR: 1/7/19

Jared,

I am not sure that I understand what you are asking for. If this is a proposal for final confirmation samples, it is **not approved**, as the proposal does not meet the requirements of that portion of the spill rule. 19.15.29.12.D [NMAC]

Please advise.

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.

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**From:** Stoffel, Jared <[JStoffel@trcsolutions.com](mailto:JStoffel@trcsolutions.com)>  
**Sent:** Wednesday, March 20, 2019 9:18 AM  
**To:** Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Hamlet, Robert, EMNRD <[Robert.Hamlet@state.nm.us](mailto:Robert.Hamlet@state.nm.us)>; Venegas, Victoria, EMNRD <[Victoria.Venegas@state.nm.us](mailto:Victoria.Venegas@state.nm.us)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Cooper, Brian <[BCooper@trcsolutions.com](mailto:BCooper@trcsolutions.com)>  
**Subject:** [EXT] Urgent: (2RP-5198) Alternate Sampling Plan for At-Risk Remediation at Carmen 3 Federal Com #1H

All,

Attached for your review is the alternative sampling plan for the Carmen 3 Federal Com #1H. The sampling plan includes twenty-one (21) floor confirmation samples from the base of the excavation and fifteen (15) sidewall confirmation samples distributed approximately as shown on the attached map. The locations on the map are

approximate based on initial delineation activities. We plan on beginning remediation activities on March 21, 2019 and the remediation is projected to take twenty (20) working days, which projects to conclude on April 17, 2019. We will be sampling as we excavate. Please let us know if the Alternate Sampling Plan is acceptable to you. Thank you very much.

**Jared Stoffel, P.G.**  
Staff Geologist



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