

Venegas, Victoria, EMNRD

From: Amber L Groves <ALGroves@paalp.com>
Sent: Friday, December 20, 2019 2:56 PM
To: Hamlet, Robert, EMNRD
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Eads, Cristina, EMNRD; Mann, Ryan
Subject: [EXT] RE: Closure Denied - Plains Pipeline - Former EK Queen Station Historical - (1RP-5593) 6-20-2019

Good Afternoon, Mr. Hamlet,

I thought that I would take the opportunity to address some of your concerns.

OCD's assumption of reclamation is correct and the 100 mg/kg requirement for the top 4' of the area has been met as shown by the chemistry tables.

You are correct that there is not data for HA-2 from 2' to 12'. The reason for this is that the delineation was only conducted to 2' for HA-1 due to olfactory indications and inability to hand auger past a rock layer. HA-2 was initially delineated to 10' as well and excavation commenced since the sample was under delineation standards. During excavation, it was necessary to take the depth to 12' bgs due to visible staining and olfactory indications. Once it was certain that the confirmation samples would be below standards, they were submitted to the lab. 3 FL 1-5 (Floor) as well as 3 SW 1-5 (Wall) are all confirmation samples of the areas initially characterized by HA-1 and HA-2. The top 4' of this area is locally sourced, non-impacted material and the excavated material was hauled to an NMOCD approved facility. Areas initially characterized as HA-3 and HA-4 were followed up with confirmation samples at 1' and 4' shown as 1 FL and 2 FL 1-2 both under 10 mg/kg. Both areas were also backfilled with locally sourced, non-impacted material.

I have left you a voicemail and I would really like the opportunity to meet with you or set up a phone call to discuss this location. I can be reached at (575)200-5517.

Thank you,

*Amber L. Groves
Remediation Coordinator
Plains All American
3112 W. US Hwy 82
Lovington, NM 88260
575-200-5517*

From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Sent: Friday, December 20, 2019 2:15 PM
To: Amber L Groves <ALGroves@paalp.com>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>
Subject: Closure Denied - Plains Pipeline - Former EK Queen Station Historical - (1RP-5593) 6-20-2019 [External]

Amber,

We have received your closure report and final C-141 for **1RP-5593 Former EK Queen Station Historical**, thank you. This closure is denied.

The OCD is under the assumption this former station has been reclaimed and is now pasture area. All off pad areas must contain a minimum of 4 feet non-waste containing uncontaminated, earthen material with chloride concentrations less than 600 mg/kg and 100 mg/kg for TPH. In the pasture area, 4 feet below the ground surface, soil contamination limits revert back to Table 1 "Closure Criteria for Soils Impacted by a Release" included in the spill rule [BLOCKED164\[.164\[.1110\[.1134/parts/title19/19\[.1015\[.10029\[.htmlBLOCKED](#)

The OCD will need to see analytical results for the 4 feet below ground surface to verify TPH is under the limit of 100 mg/kg for TPH. One point of confusion, the report says, "Impacted soil in the area characterized by sample points HA-1 and HA-2 was excavated to a depth of twelve (12) feet", but the analytical table only have 2 feet below surface for HA-1 and 10 feet below surface for HA-2. Please include the missing analytical data in the table to verify the limits have been met.

For additional guidance, the OCD has put some clarifications on the implementation of the Spill Rule on our website: <http://www.emnrd.state.nm.us/OCD/documents/OCDInternalPolicy-SpillRuleClarifications.pdf>

Please let me know if you have any further questions.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
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Robert.Hamlet@state.nm.us

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