

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, April 15, 2020 2:53 PM
To: 'Varnell, Richard'; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD
Cc: Shemaria, Mark; Nolan, Melanie A.; Coupland, Lori; Hoover, Shannon; Gilbert, Bryan
Subject: RE: NMOCD No. 1RP-5154; WTX to EMSU Battery to Byrd Pump Crude Oil Release, Monument, Lea County, New Mexico

Hi Mr. Varnell,

Please, include that information in a Remediation Plan and submit it via OCD's fee portal.

<https://wwwapps.emnrd.state.nm.us/OCD/OCDPermitting/Default.aspx> .

Make sure to include the incident number for each release:

- **NOY1822242858** for HOLLY ENERGY WTX TO EMSU BATTERY TO BYRD PUMP SEGM
- **NCE2003752717** for ARTESIA WEST STATION @ G-28-18S-28E

Once submitted, the report goes into a cue and is assigned and reviewed in the order it is received. When the evaluation is completed you will receive an email with the approval, from the assigned reviewer, and the corresponding signed Form C-141 or, if rejected, an explanation of why it was denied.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Victoria.Venegas@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 groundwater, 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, or local laws and/or regulations.

From: Varnell, Richard <RVarnell@trccompanies.com>
Sent: Wednesday, April 15, 2020 2:37 PM
To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Shemaria, Mark <Mark.Shemaria@hollyenergy.com>; Nolan, Melanie A. <Melanie.Nolan@hollyenergy.com>; Coupland, Lori <Lori.Coupland@hollyenergy.com>; Hoover, Shannon <SHoover@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>
Subject: [EXT] NMOCD No. 1RP-5154; WTX to EMSU Battery to Byrd Pump Crude Oil Release, Monument, Lea County, New Mexico

Hi Victoria,

Per my voice mails and our text exchange, TRC is the new consultant representing Holly Energy Partners – Operating L.P. (HEP) at the WTX to EMSU Battery to Byrd Pump Crude Oil Release Site (NMOCD No. 1RP-5154). As I indicated by text, this project was delayed due to a protracted access agreement negotiation with the land owner (L&K Ranch, LLC). HEP successfully concluded that negotiation in March 2020 and has retained TRC to complete the assessment of the Site.

The last document submitted to NMOCD was a Soil Assessment Report and Supplemental Assessment Work Plan (SAWP). That document was submitted on 11/1/2018 and approved by NMOCD on 1/17/2019. It indicated that:

- 1) Field screening, but no analytical data, suggested that impacted soil was present from the ground surface to a depth of at least 17 feet at the release point.
- 2) Analytical data from the boring installed next to the release point (SB-1) did not confirm the shallow impact to 17 feet – the sample from 4-5 feet below ground surface (bgs) was non-detect for chloride, BTEX, and TPH. However, a concentration of 625 mg/kg of chloride was reported in SB-1 (20-21 feet bgs) and a total TPH concentration of 1240 mg/kg was reported in SB-1 from a sampling interval of 34-35 feet bgs. SB-1 was installed to a total depth of 35 feet bgs.
- 3) BTEX and TPH were not detected in any of the soil samples from the 3 surrounding borings. Chloride was detected in samples collected from intervals deeper than 5 feet bgs, but none of the concentrations exceeded 600 mg/kg. The total depths of SB-2 and SB-4 were 35 feet bgs, the total depth of SB-3 was 25 feet (depth was limited due to auger refusal).
- 4) Groundwater was not encountered in any of the borings.

As I mentioned, TRC and HEP wish to modify the previously approved SAWP.

The SAWP called for the installation of 4 monitoring wells and 3 borings at the Site. One of the monitoring wells would be installed adjacent to the pipeline release point (the source area), the other 3 in the surrounding area. The 3 borings would also be installed in the surrounding area.

The changes TRC is proposing to the approved SAWP are:

- 1) TRC will install the 4 monitoring well borings, but not install the 3 additional borings. They are duplicative – there is already lateral delineating data from the borings that have already been installed at the Site, and we plan on collecting more soil samples from the monitoring well borings to confirm the lateral delineation is complete.
- 2) TRC will attempt to continuously core the source area monitoring well boring. The cores will be field screened using a chloride field test kit or meter and a photo-ionization detector (PID). If possible, TRC will attempt to vertically delineate chloride and TPH in soil above groundwater at this location. Following NMOCD guidance, at least 10 feet of soil that does not contain contaminants above the applicable Closure Criteria will be necessary to confirm vertical delineation of the release above groundwater.
 - a. If field screening suggests that the impacts are delineated with at least 10 feet of soil above the water table, TRC will collect confirmatory soil samples and terminate the boring at that depth.
 - b. If field screening suggests that the impacts are not delineated with at least 10 feet of soil above the water table, the boring will be advanced into the groundwater-bearing unit and a monitoring well will be installed in the source area.
- 3) The source area monitoring well boring will guide the installation of the other 3 monitoring well borings.
 - a. If it appears that impacts in the source area have been delineated above groundwater, TRC will install the 3 monitoring well borings to the source area delineation depth and collect soil samples accordingly.
 - b. If TRC is unable to delineate TPH and chloride above the water table in the source area, all three surrounding borings will be advanced to the uppermost groundwater-bearing unit and converted to monitoring wells.
- 4) The other, more minor changes proposed by TRC are:
 - a. Well diameter will be reduced from 4 inches to 2 inches.

- b. The proposed well depth will be increased from 45 feet to 65 feet bgs. This change is based on a historical report of groundwater in the area at a depth of approximately 55-60 feet bgs.
- c. TRC will collect soil samples from the monitoring well boring that was previously assumed to be an upgradient point.

The 4 monitoring well borings will be installed in the same locations that were previously proposed. Those locations are provided on the attached figure.

Please let us know if these changes are acceptable and when we are approved to proceed with the modified SAWP.

Thanks!

Richard (RD) Varnell, P.G., P.E.
Senior Project Manager



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Please note that my office number has changed.