

Fields, Vanessa, EMNRD

From: Varsa, Steve <steve.varsa@stantec.com>
Sent: Tuesday, February 12, 2019 6:37 AM
To: Fields, Vanessa, EMNRD
Subject: [EXT] FW: 3RP-213 Lat O-21 Line Drip - Case Closure Request

Hi Vanessa – Let me know if you need anything further regarding the above-referenced site. As discussed during our meeting last week, I believe you were satisfied with issuing a NFA for this case.

Thank you,
Steve

Stephen Varsa, P.G.
Senior Hydrogeologist
Stantec Environmental Services
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From: Varsa, Steve
Sent: Friday, November 30, 2018 3:43 PM
To: 'Fields, Vanessa, EMNRD' <Vanessa.Fields@state.nm.us>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; 'Wiley, Joe' <Joe_Wiley@kindermorgan.com>
Subject: RE: 3RP-213 Lat O-21 Line Drip - Case Closure Request

Hi Vanessa –

In regards to the subject case closure request, there is one location where soil exceeded the applicable NMOCD Closure Criteria (MW-5, at a depth of 30-31 feet, collected in April 2017, had a total petroleum hydrocarbon [TPH] concentration of 310 milligrams per kilogram [mg/kg]), as summarized on Table 1. As documented in Attachment B of the case closure request, the soil sample was collected from the interval exhibiting the highest field-screening reading observed during advancement of the MW-5 well. As summarized on Table 1, the results of an analysis of the subject soil sample revealed it does not contain concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX) in exceedance of the applicable NMOCD Closure Criteria.

As depicted in Site figures, monitoring well MW-5 was advanced to the north of MW-1, with the purpose of delineating the extent of groundwater concentrations in this direction away from monitoring well MW-1. Monitoring well MW-1 was installed in the area of the former line drip, after it was closed in January 1995. As noted on the Site figures, there are a number of active pipelines which limit effective remediation of this area, particularly to a depth of 30-31 feet below ground surface. As exposure to the soil at this depth is not possible, the primary concern of the residual hydrocarbons in soil at the MW-5 location is leaching to groundwater.

As summarized on Table 3 of the subject case closure request, monitoring well MW-5 was sampled and analyzed for BTEX on five occasions, with detectable concentrations of BTEX constituents absent in each sample. A further assessment of risk of the TPH having leached into groundwater was conducted, as allowed pursuant to Section VI.A of the NMOCD Spill Remediation Guidelines (August 13, 1993). A New Mexico Water Quality Control Commission (NMWQCC) groundwater standard has not been established for TPH, and therefore was not analyzed. Evaluation of the risk of TPH having leached into groundwater was instead completed by the sampling of groundwater for NMWQCC-regulated polynuclear aromatic hydrocarbons (PAHs). As summarized on Table 4, detectable concentrations of PAHs

were not present. Free product has also not been detected at the MW-5 location. Based on this evaluation, the remaining contaminants will not pose a threat to present or foreseeable beneficial use of the groundwater, public health, or the environment, and remediation of soil is not warranted.

Note this site was evaluated in the same manner as was presented in the case closure request for 3RP-214 (Lindrith B #24), where a TPH exceedance was also present in vadose-zone soil, but quarterly groundwater sampling, including analysis of PAHs, revealed no groundwater exceedances, and case closure was subsequently granted.

Please feel free to contact Joe Wiley, of EPCGP, or me, if you need any further information.

Thank you,
Steve

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steve.varsa@stantec.com

From: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Sent: Tuesday, November 27, 2018 3:59 PM
To: Varsa, Steve <steve.varsa@stantec.com>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Subject: RE: 3RP-213 Lat O-21 Line Drip - Case Closure Request

Good afternoon Steve,

I will be your point of contact for all Kinder Morgan 3RPs. I have taken a moment to review 3RP 213 and after a quick review it appears the vadose zone has not been fully remediated. Do you have any other relevant documents available?

Thank you,

Vanessa Fields
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 119
Cell: (505) 419-0463
vanessa.fields@state.nm.us

From: Varsa, Steve <steve.varsa@stantec.com>
Sent: Tuesday, November 27, 2018 2:53 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Subject: [EXT] FW: 3RP-213 Lat O-21 Line Drip - Case Closure Request

Good afternoon Cory and Vanessa:

Pursuant to Randy's note below, when might we expect a response to the subject case closure request?

Thank you,
Steve

Stephen Varsa, P.G.
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From: Bayliss, Randolph, EMNRD <Randolph.Bayliss@state.nm.us>
Sent: Tuesday, November 27, 2018 2:55 PM
To: Varsa, Steve <steve.varsa@stantec.com>
Subject: RE: 3RP-213 Lat O-21 Line Drip - Case Closure Request

Hey Steve

Cory and Vanessa will contact you on this.

I am transferring to the State Land Office effective 01Dec18. Cory and Vanessa will be your primary contact on all District 3 remediation projects.

A pleasure working with you.

Randy

From: Varsa, Steve [<mailto:steve.varsa@stantec.com>]
Sent: Tuesday, November 6, 2018 5:50 AM
To: Bayliss, Randolph, EMNRD <Randolph.Bayliss@state.nm.us>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Wiley, Joe <Joe_Wiley@kindermorgan.com>
Subject: [EXT] 3RP-213 Lat O-21 Line Drip - Case Closure Request

Hi Randy –

Please find attached a Groundwater Monitoring Report and Case Closure request for the above-referenced site. Please contact Joe Wiley at 713-420-3475, or me , if you have any questions.

Thank you,
Steve

Stephen Varsa, P.G.
Senior Hydrogeologist
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