

From: [Yu, Olivia, EMNRD](#)
To: ["Ericson, Dean"](#)
Cc: ["Bockisch, Bernie"](#)
Subject: RE: 1RP4499 delineation report
Date: Wednesday, May 31, 2017 1:35:00 PM
Attachments: [1RP4499_approvedWP.pdf](#)

Dear Mr. Ericson:

NMOCD approves the delineation workplan for 1RP-4499 on the condition that NMOSE documentation for groundwater be included in the closure report. Please see the attachment for your records.

Thanks,
Olivia

From: Ericson, Dean [mailto:Dean.Ericson@energyTransfer.com]
Sent: Thursday, April 27, 2017 6:38 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: 1RP4499 delineation report

Thanks for the follow-up. Will progress the revisions as listed below. Thanks, Dean

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Wednesday, April 26, 2017 9:20 AM
To: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: 1RP4499 delineation report

Good morning Dean:

Thank you for the photos. NMOCD still affirms that the delineation report for 1RP-4499 be modified to reflect that the depth to groundwater is < 50 ft. bgs for these reasons:

1. The nearest NMOSE water well, which is closer than the USGS well, was drilled in 2014.
2. NMOCD has recent data from groundwater monitoring wells from other incidents, which demonstrate that GW is < 50 ft. bgs.

Although the delineation for 1RP-4499 is adequate, for the record, please edit the report to incorporate the above information on groundwater and the below questions.

- Where were the two bottom samples taken? Was the same location sampled on two different dates? Demarcate on Figure 2 where these bottom hole samples were taken.
- Provide any available data from field tests.

Please confirm.

Thanks,
Olivia

From: Ericson, Dean [<mailto:Dean.Ericson@energyTransfer.com>]
Sent: Friday, April 21, 2017 7:12 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: 1RP4499 delineation report

Olivia,

I wanted to include these 2 remediation pics for Fullerton 16".

Please call if any questions arise,

Thanks,
Dean D. Ericson
Sr. Environmental Specialist
Energy Transfer Company
817-302-9758 – Office
432-238-2142 - Cell

From: Ericson, Dean
Sent: Thursday, April 20, 2017 11:52 AM
To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: 1RP4499 delineation report

Olivia,

Current USGS data was used to assess the depth to groundwater in this area. Sampling results (*see attached- Fullerton 16inch Sample Results dated 121616*) did not indicate the presence of chloride concentrations exceeding 250 milligrams per kilogram (mg/kg). This information was not included in the submittal, I apologize for the oversight. As indicated in the *Fullerton 16inch Sample Results dated 121616* samples were collected from the bottom of the excavation with a result of 13.7 mg/kg and from the stockpile with a result of 166 mg/kg . Based on these results, it's unlikely that the presence of chloride exceeded 250 mg/kg and thus further sampling was not performed. Analytical data from the bottom and sidewalls of the excavation indicate that Benzene, toluene, ethylbenzene, and xylene concentrations as analyzed by *EPA Method 8021* were below the laboratory reporting limits (*see Figure 2 and Table 1 of the report*); and Total petroleum hydrocarbon (TPH) concentrations as analyzed by EPA Method 8015 were below the LRL for all of these samples with the exception of the southern wall sample that indicated a concentration of 11.2 mg/kg (*see Figure 2*).

Laboratory analyses was performed by Cardinal Laboratories in Hobbs, New Mexico and are included in the Remediation Summary Report as an appendix (see attached). Analytical results from all samples collected are well below the more stringent recommended remediation action level (RRAL) for a site that would be ranked as a 20 (RRAL of 100 mg/kg for TPH), based on these results, we believe the closure criteria has been met.

It is standard practice for our field crews to place a plastic liner under the impacted soils prior to their disposal at a regulated facility, (see attached photograph - Fullerton 16inch Remediation Pic1). As requested attached are the following photographs

- Fullerton 16inch Leak Pic1
- Fullerton 16inch Leak Pic2
- Fullerton 16inch Remediation
- Fullerton 16inch Remediation Pic1
- Fullerton 16inch Remediation Pic2
- Fullerton 16inch Remediation Pic3

Please let us now if you have any other questions,

Thanks,

Dean D. Ericson
Sr. Environmental Specialist
Energy Transfer Company
817-302-9758 – Office
432-238-2142 - Cell

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, April 18, 2017 3:38 PM
To: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: 1RP4499 delineation report

Dean:

Please address these concerns regarding the delineation report for 1RP-4499.

1. The report does not show evidence of chloride testing. Why?
2. NMOSE database indicates average depth to groundwater for this area at < 50 ft. and that the nearest water well (0.3 mile from the release location) shows the water table at 29 ft. bgs. Thus, the RRALs for permissible Benzene, BTEX, and TPH are more stringent than indicated in the report. The report needs to be modified to reflect this.
3. Was a liner placed down for the contaminated stockpiled soil?
4. Please include photos of the release and documentation of activities.

NMOCD requests that vertical and horizontal delineation for chlorides to be conducted. Permissible chloride levels with GW at < 50 ft. is 250 mg/kg obtained and maintained for an additional 10 ft. below. For the current excavated area, please send bottom and sidewall samples to an accredited laboratory.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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.

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.