

From: [Yu, Olivia, EMNRD](#)
To: ["Foord, William \(Scott\)"](#)
Cc: [Groves, Amber](#); [Project Email Filing](#)
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports ~COR-074638-2017~
Date: Friday, August 25, 2017 12:30:00 PM
Attachments: 1RP3942_approvedClosure.pdf

Mr. Foord:

NMOCD grants closure to 1RP-3942. Please see attachment for your records.

Like approval from NMSLO is required for this 1RP as well as the revegetation plan.

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.

From: Foord, William (Scott) [<mailto:William.Foord@ghd.com>]
Sent: Monday, July 24, 2017 2:38 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Project Email Filing <Filing-NA@ghd.com>
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports ~COR-074638-2017~

Olivia,

Sorry for the delay, please see attached final C-141 for NMOCD and NMSLO 1RP closure approval. Please let me know if you have any questions or concerns.

Scott

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, July 06, 2017 4:58 PM
To: Foord, William (Scott) <William.Foord@ghd.com>
Cc: Groves, Amber <agroves@slo.state.nm.us>
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Scott:

No, you can proceed to submit a final C-141 for NMOCD and NMSLO 1RP closure approval in terms of remediation. NMSLO will determine closure regarding revegetation independently.

Thanks,
Olivia

From: Foord, William (Scott) [<mailto:William.Foord@ghd.com>]
Sent: Thursday, July 6, 2017 3:05 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Olivia,

Quick question.

The SLO required 4 quarters of vegetation monitoring is new and this site still has three quarters left. Should we wait to complete the final C-141 and submit it with the annual veg monitoring report after the four quarters (CC to Amber) to knock out the final closure in one submittal?

Just want to make sure we are doing this in the right sequence and want to assure we don't have any complications later. Please let me know your thoughts on this.

Scott

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, April 18, 2017 12:05 PM
To: Foord, William (Scott) <William.Foord@ghd.com>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Jason Michelson <JMichelson@chevron.com>
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Scott:

Please submit a final C-141 for my review. If there are any additional photos or information to include, please submit that along with the final C141, so that I can close out 1RP-3942.

Thanks,
Olivia

From: Foord, William (Scott) [<mailto:William.Foord@ghd.com>]
Sent: Monday, April 17, 2017 10:36 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Jason Michelson <JMichelson@chevron.com>
Subject: Re: 074638 Abo Reef Gathering System Analytical Reports

That will be it. We will follow up with quarterly vegetation monitoring/reporting.

Sent from my iPhone

On Apr 17, 2017, at 11:30 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Scott:

Thank you for your prompt response. Just to clarify, so does the February 2, 2017 document constitute a closure report or will another document be submitted?

Olivia

From: Foord, William (Scott) [<mailto:William.Foord@ghd.com>]
Sent: Monday, April 17, 2017 10:26 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>; Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Jason Michelson <JMichelson@chevron.com>
Subject: Re: 074638 Abo Reef Gathering System Analytical Reports

Thank you both. Take care.

Scott

Sent from my iPhone

On Apr 17, 2017, at 11:25 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Good morning Scott:

NMOCD and NMSLO agree that no further delineation is required for 1RP-3942 Abo Reef Gathering System.

Thanks,
Olivia

From: Foord, William (Scott) [<mailto:William.Foord@ghd.com>]
Sent: Wednesday, April 12, 2017 11:52 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Re: 074638 Abo Reef Gathering System Analytical Reports

Thank you Olivia, please keep me updated.

Scott

Sent from my iPhone

On Apr 12, 2017, at 12:48 PM, Yu, Olivia, EMNRD
<Olivia.Yu@state.nm.us> wrote:

Scott:

Pardon for not responding. I was in the field yesterday and this morning, so did not have much time to write emails. I spoke with Tomáš and we decided that the additional delineation would not be needed for this site. At the time I spoke with Amber, she has not reviewed the material yet. I'll try again sometime today.

Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Wednesday, April 12, 2017 10:49 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Re: 074638 Abo Reef Gathering System Analytical Reports

Olivia,

Any word back?

Thanks,
Scott

Sent from my iPhone

On Apr 11, 2017, at 9:13 AM, Yu, Olivia, EMNRD
<Olivia.Yu@state.nm.us> wrote:

Good morning Scott:

Thank you for the update. Pardon the delay. I will converse with Tomáš and Amber today about additional horizontal delineation and let

you know ASAP.

Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Tuesday, April 11, 2017 7:37 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering
System Analytical Reports

Olivia,

Have you received any responses from Amber or Tomas on the question of the RRALs based on gw depth of <100 ft at Abo Reef? The water well located within a couple of hundred feet from the site was confirmed dry at 104 ft and the 4 ft historic excavation has been lined and backfilled following work plan approval from NMOCD (confusion of the depth earlier was my bad memory, we had to build a ramp down into the excavation previously to get the drill rig in). Additionally, GHD currently monitors several sites within a mile radius of the site with confirmed gw elevations greater than 120 ft bgs. We are trying to finalize budgeting for this site and if additional assessment activities are requested, significantly greater funding will have to be requested. Please let me know if you need any additional information from me or if you would like to schedule a call to discuss.

Take care,
Scott

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 24, 2017 5:21 PM
To: Foord, William (Scott)
Cc: Groves, Amber; Oberding, Tomas, EMNRD; Jason Michelson (JMichelson@chevron.com)
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Scott:

NMOCD decided that given the amount of work already completed for 1RP-3942, the incident can move towards closure if the below information is provided:

1. Confirmation of the depth of excavation.
The first page of the Abo Reef Gathering System soil assessment and delineation report (February 2, 2017) stated that the entire site was excavated to 4 ft. and a liner set at 4 ft. bgs, even though the text of the report and the response below indicate otherwise. If confirmation is provided of the depth of excavation and liner, then NMOCD considers the delineation and remediation of the release area complete.
2. However, as SW3 and SW4 are above permissible TPH and chloride levels (based on average depth to groundwater of <100 ft.) at 2.5 ft. bgs and bottom confirmation samples at 4 ft. were not taken (presumably, please provide otherwise), NMOCD requests that two soil bores directly opposite SW3 & SW4, on the western side of the underground pipeline, be established. These borehole locations would be considered sufficient to complete horizontal and vertical delineation of TPH and chlorides for this site.

Please let me know if you have questions, want clarification, and whether you agree to these conditions or not.

Thanks,
Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Friday, March 24, 2017 1:18 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>;

Oberding, Tomas, EMNRD
<Tomas.Oberding@state.nm.us>; Jason
Michelson (JMichelson@chevron.com)
<JMichelson@chevron.com>

Subject: RE: 074638 Abo Reef Gathering
System Analytical Reports

Olivia,

Understood. Please note the age of installation and logs for many of the historic wells in the NMOSE database and that groundwater levels have fallen dramatically in the area in the last few decades. I'll do some research in our database and see if we have any other sites with wells nearby with recent gauging data, will forward if I find anything.

Have a great weekend and please let me know if you need any additional information from me.

Scott

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 24, 2017 1:46 PM
To: Foord, William (Scott)
Cc: Groves, Amber; Oberding, Tomas, EMNRD
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Scott:

Thank you for the update about the upcoming visit to the site. Please keep us informed.

FYI. Regardless of whether the L05411 well is active or not, NMOCD evaluates permissible levels for releases based on the presumed depth to groundwater in a 2000 m radius (equivalent to the length of a section) from the average of all OSE wells, whether active and not. Additionally, the Chevron Water Trend map is consulted, which also indicates water table at <100 ft. bgs. I can provide the map for Lea County to you if you don't already have a

copy.

Thanks,
Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Friday, March 24, 2017 11:07 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Groves, Amber <agroves@slo.state.nm.us>;
Oberding, Tomas, EMNRD
<Tomas.Oberding@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering
System Analytical Reports

Olivia,

Here's where the well (L05411) plots from the coordinates from the NMOSE database. Says it was installed in 1964, pretty sure it's not there now, we used that area as a staging area when we backfilled the historic excavation last year and I don't remember seeing anything. I have a tech in the area tomorrow; he will drive by and take a look to verify. I'll send pics when I get them and let you know if he finds anything.

Scott

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 24, 2017 10:42 AM
To: Foord, William (Scott)
Cc: Groves, Amber; Oberding, Tomas, EMNRD
Subject: RE: 074638 Abo Reef Gathering System
Analytical Reports

Scott:

Happy Friday to you, too! Thank you for your prompt response and documents. I do have the previous reports, which I retrieved from NMOCD's online database, and am reviewing them now. The reason why I am asking is that there might be a change in assessment, based on information about depth to groundwater

and nearest waterbody. I checked the NM Office of State Engineer's database and it showed a well <1000 ft. away and at 60 ft. bgs (L05411), which changes the RRALs, and thus, the corrective actions. The well search is attached for your information.

Still, the remediation work might be adequate depending on the depth that the liner was set. I will get back to you by the end of today after conversing with my supervisors in Santa Fe.

Thanks,
Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Friday, March 24, 2017 8:58 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering
System Analytical Reports

Happy Friday Olivia!

The work was conducted following work plan approval by NMOCD on January 25, 2016. I've attached the approved work plan for your reference. NMOCD requested vertical delineation of one former soil sample (SS-2), which was completed last year and details are in the report you are currently reviewing.

The depth of the excavation varied from around a foot to approximately 4 feet. A previous report was submitted in 2015 with the data you are inquiring about. The report is big (10 MB) so I'll have to piece mail it to you if you don't have it. It should be in your data base already though. I've attached the soil sample concentration tables and a figure with the majority of the info from that report. Let me know if you need the rest of the report and I'll break it down and send.

Scott

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 24, 2017 9:42 AM
To: Foord, William (Scott)
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Good morning Scott:

I am reviewing the delineation report for 1RP-3942 now. Unless I am mistaken, the report did not specify the actual depth of the excavation and at what depth the liner was set. Were bottom confirmation samples taken for BTEX, TPH, chlorides? Please provide this information or point to which page(s) I should be reading more closely.

Thanks!
Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Tuesday, March 14, 2017 3:23 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Good deal. Please let me know if you have any questions or concerns.

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, March 14, 2017 4:22 PM
To: Foord, William (Scott)
Subject: RE: 074638 Abo Reef Gathering System Analytical Reports

Thanks much! Received both analyticals and delineation workplan. I will review as soon as possible.

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Tuesday, March 14, 2017 3:11 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 074638 Abo Reef Gathering
System Analytical Reports

Here's the analytical.

From: Yu, Olivia, EMNRD
[<mailto:Olivia.Yu@state.nm.us>]
Sent: Tuesday, March 14, 2017 4:04 PM
To: Foord, William (Scott)
Subject: RE: 074638 Abo Reef Gathering System
Analytical Reports

Hi Scott:

Really sorry. I didn't know that the system does not like zip files. Neither attachments escaped the scrubber. I think 2 separate pdfs of 5 mbs should get through. I've received your previous emails with pdfs of this size without any issues.

Thanks for your patience,
Olivia

From: Foord, William (Scott)
[<mailto:William.Foord@ghd.com>]
Sent: Tuesday, March 14, 2017 1:57 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: 074638 Abo Reef Gathering System
Analytical Reports

Olivia,

Here are the lab reports (5MB still....), let me know if it works.

Scott

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