

From: [Yu, Olivia, EMNRD](#)
To: "Naranjo, Mark"; Alan.Brandon@ghd.com
Cc: Bernard.Bockisch@ghd.com; [Zane Kurtz](mailto:Zane_Kurtz@eogresources.com); cctofiling@croworld.com
Subject: RE: 088210-53 Hunt APO State No. 1 (1RP-4891) ~COR-088210-53~
Date: Tuesday, January 30, 2018 2:25:00 PM

Mr. Brandon:

Based on the information provided, NMOCD will agree that delineation has been completed for the area in the right-of-way (1RP-4891) and approves of the proposed remedial activity of 4 ft. excavation with a properly-keyed, minimum 20 mil liner at the base. Laboratory analyses of confirmation sidewall samples for TPH extended and chlorides are required before backfill approval is granted.

Additional vertical delineation within the berms, area around the tank battery, (1RP-4892) will continue, correct?

Thanks,
Olivia

From: Naranjo, Mark [<mailto:MNaranjo@slo.state.nm.us>]
Sent: Monday, January 29, 2018 1:28 PM
To: 'Alan.Brandon@ghd.com' <Alan.Brandon@ghd.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Bernard.Bockisch@ghd.com; [Zane Kurtz](mailto:Zane_Kurtz@eogresources.com) <Zane_Kurtz@eogresources.com>; cctofiling@croworld.com
Subject: RE: 088210-53 Hunt APO State No. 1 (1RP-4891) ~COR-088210-53~

NMSLO approves backfill request, pending any other requirements Oliva may have.

Mark Naranjo
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From: Alan.Brandon@ghd.com [<mailto:Alan.Brandon@ghd.com>]
Sent: Wednesday, January 24, 2018 1:32 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Bernard.Bockisch@ghd.com; Zane Kurtz <Zane_Kurtz@eogresources.com>; cctofiling@croworld.com
Subject: RE: 088210-53 Hunt APO State No. 1 (1RP-4891) ~COR-088210-53~

Olivia and Mark,

1. Attached is an updated drawing for the site. The dates for the TP-11 samples have been corrected.
2. The samples were split between field screening and the laboratory. The chloride field screening strips do not always coincide with the laboratory results due to many potential variances. The screening is only used as a guide in the field and that is why we rely on the laboratory analysis.
3. The reason another sample was not collected at a greater depth in TP-11 is that the extent of the excavator was reached. Due to the depth of water being approximately 90 feet below ground surface and the significant drop in chloride concentrations from 16 to 20 feet below ground surface we feel that it is unlikely that groundwater would be impacted.

We would like to excavate the chloride impacted soil in the right-of-way to four feet below ground surface and line the base of the excavation. The proposed excavation limits shown on the attached figure are only estimated at this time. Field screening will be performed to guide the excavation activities and confirmation soil samples will be collected for laboratory analysis once field screening indicates soil concentrations are below the RRALs. A final drawing will be provided showing the final excavation limits and confirmation soil sample locations and results. If the soil sample analytical results indicate impacted soils above the RRALs have been removed, we would request authorization to backfill and re-seed the area.

Thanks

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, January 18, 2018 12:23 PM
To: Alan Brandon <Alan.Brandon@ghd.com>; Naranjo, Mark <mnanaranjo@slo.state.nm.us>
Cc: Bernard Bockisch <Bernard.Bockisch@ghd.com>; Zane Kurtz <Zane_Kurtz@eogresources.com>; cctofiling@croworld.com
Subject: RE: 088210-53 Hunt APO State No. 1 (1RP-4891) ~COR-088210-53~

Mr. Brandon:

Several questions regarding the Figure submitted for 1RP-4891 and 1RP-4892 on January 9, 2018. In regards to delineation for 1RP-4891:

1. Why is the date for TP-11 FS one earlier than TP-11? Is this a typo?
2. Please explain the large difference between field chloride tests at 14 and 16 ft. bgs and laboratory analyses for TP-11? Were these not split samples?
3. The email dated from December 11, 2017 stated that complete vertical delineation required 2 depths with permissible chloride levels. Please provide a rationale for not collecting a sample further in depth beyond 20 ft. bgs at TP-11.

For like approval from NMSLO, please submit documents to Mark Naranjo in the interim.

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: Alan.Brandon@ghd.com [<mailto:Alan.Brandon@ghd.com>]
Sent: Tuesday, January 9, 2018 10:11 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; agroves@slo.state.nm.us
Cc: Bernard.Bockisch@ghd.com; Zane Kurtz <Zane_Kurtz@eogresources.com>; cctofiling@croworld.com
Subject: 088210-53 Hunt APO State No. 1 (1RP-4891) ~COR-088210-53~

Olivia and Amber,

Please find attached a drawing for the Hunt APO State No. 1 site showing the recent additional assessment results for the RP-4891 release. The horizontal extent of chloride impacted soil has been delineated except the area near TP-3. We propose to excavate the area in the NMDOT right-of-way noted on the drawing to a depth of 4 feet below ground surface, line the bottom of the excavation, and then backfill it. We will collect sidewall samples for field screening to guide the excavation activities. Once field screening indicates that the impacted soil has been excavated, sidewall confirmation samples will be collected for laboratory analysis. Please let us know if you concur with our proposed actions.

Additional assessment will be performed within the berm area for the 1RP-4892 release.

Thank you

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