

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Chan Patel](#); ["Mann, Ryan"](#)  
**Cc:** ["Les Teague"](#)  
**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)  
**Date:** Friday, May 11, 2018 11:42:00 AM

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Mr. Patel:

NMOCD shares similar concerns to the ones indicated below by NMSLO regarding the delineation for 1RP-4836 and 1RP-3961. NMOCD acknowledged two oversights in the approved proposed delineation workplan and provide the following corrections:

1. The purpose of lining a facility is to prevent releases from lateral and vertical migration, thereby potentially impacting groundwater and surface. In general, a facility is entirely lined, including below the tanks, in order to contain a release and facilitate vacuuming of fluids. The intentional creation of a break in a lined facility would cancel the advantage of a lined facility. Similarly, a bermed location is to hinder the movement of fluids off location.
2. The use of the term 'stormwater' is not appropriate. The climate in NM does not receive sufficient precipitation overall to warrant stormwater drainage control.

Please note that

1. A subsurface caliche layer is not an acceptable rationale for incompleteness of delineation.
2. NMOCD does not accept the usage of upper and lower confidence intervals. The application of +/- 5% standard deviation may be applicable to evaluate the correlation between field tests and laboratory analyses.
3. NMOCD must have electronic copies of all laboratory analyses provided in an email-accessible pdf format. Please reduce the file size of the laboratory analyses and submit as attachments to an email or posted to a fileshare link (except Dropbox).

As mentioned, vertical delineation is not completed at this location. Chloride levels at bottom of soil boreholes 2 & 4 at 20 ft. bgs still exceed permissible levels of 600 mg/kg. Horizontal delineation is mostly completed. Additional lateral release characterization will be required North of CD-2, East of BUC-1. Submit a map with the proposed sample locations for Stage II delineation.

Please be advised that the break in the liner on top of the berm surrounding the tanks will need to be repaired and impacted fill material within the berms removed and exposed liner inspected. Submit photo documentation of the intact liner and a statement of liner integrity.

NMSLO may have additional concerns and stipulations to be included in Stage II delineation.

Thanks,  
Olivia

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**From:** Chan Patel <chan.patel@entechservice.com>  
**Sent:** Friday, May 4, 2018 7:37 AM  
**To:** 'Mann, Ryan' <rmann@slo.state.nm.us>  
**Cc:** 'Les Teague' <Les.Teague@cjes.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)

Hi Ryan

Thank you for the prompt partial review of the above referenced report.

To address your questions I have presented your question followed by our response.

- The report makes several references to stormwater runoff. I'm a little confused, but it is not acceptable to plan to continue to have stormwater leaving the site. Any contaminants on the surface would, presumably run off site.

The stormwater outfall has been at this location on the site to prevent stormwater run-off from flooding the site. As our intent is to excavate the surface effected soil down to 1 foot and backfill with compacted caliche, stormwater will not be exposed to contaminant from the release. We also plan to sample the stormwater to show concentrations of chemicals of concern (COC) is in the stormwater as it leaves the site. If contaminants are present in stormwater other plans will be considered.

- I'm confused on the amount of samples taken and how they're separated (BUC vs D) and the depths selected. Typically vertical delineation extends deeper than 32", and refusal is not acceptable rationale for cessation soil sampling. It seems to me that all this data will need to be incorporated in order to get the best picture of what going on. This includes the chloride results from B-4 and BUC-15.

To minimize the number of mobilizations to collect soil samples, we planned to collect all samples in as single mobilization. The initial samples planned to delineate the potential releases were labelled "D". Additional sample or back up confirmation samples labelled "BUC" were also collected, so if a delineation sample came up above limits then, a BUC sample around it could be analyzed for horizontal delineation.

The depth of the samples collected was specified in the NMOCD approved scope of work (attached) and states "grab sample will be taken from the sample location at the shallow surface (0 to 6-inches below ground surface (bgs)) and just above the hard pan (18 to 24-inches bgs)". When the well cemented caliche rock hard pan was encountered a sample was also collected. Only 4 locations (B1 through B4) were planned to be sampled at 5 feet, 10 feet and 20 feet depth using the drilling rig. As indicated in our findings, vertical delineation may not be considered complete.

- If the plan for the berm is to cover with HDPE and leave the contaminated soil in then at best the remediation permit will be deferred until closure of the facility.

There are two options for the berm, the first is to remove the uncovered section of the berm where an initial cut was made to access the damaged tank(s) from the lightning strike that were later replaced. The second option is to address this berm area when the facility is shut down and all equipment and berms removed.

- Any area outside of the facility will need to be addressed for revegetation, so a gypsum and caliche treatment is zone is not acceptable.

Our approach was a precautionary one to possibly minimize the potential of any chlorides that leave the facility in stormwater. Regardless, the plan is to excavate the effected soil outside the fence. The excavated area can be backfilled with caliche and soil to allow growth of vegetation.

Once again, thank you for your prompt partial review of the investigation report. We would like to meet with you and further discuss the path forward for this site.

Regards

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**From:** Mann, Ryan [<mailto:rmann@slo.state.nm.us>]  
**Sent:** Monday, April 30, 2018 12:15 PM  
**To:** 'Chan Patel' <[chan.patel@entechservice.com](mailto:chan.patel@entechservice.com)>; 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** 'Les Teague' <[Les.Teague@cjes.com](mailto:Les.Teague@cjes.com)>  
**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)

Good morning Chan,

I've partially reviewed the submitted documents and wanted to clarify some things before I go any further.

- The Recommended Remediation Level (RRAL) is established as a baseline value for remediation activities, so the UTLs applied to TPH and chlorides will not be acceptable. 100 mg/kg and 600mg/kg, respectively, the minimal contamination levels that will need to be used.
- The report makes several references to stormwater runoff. I'm a little confused, but it is not

acceptable to plan to continue to have stormwater leaving the site. Any contaminants on the surface would, presumably run off site.

- I'm confused on the amount of samples taken and how they're separated (BUC vs D) and the depths selected. Typically vertical delineation extends deeper than 32", and refusal is not acceptable rationale for cessation soil sampling. It seems to me that all this data will need to be incorporated in order to get the best picture of what going on. This includes the chloride results from B-4 and BUC-15.
- If the plan for the berm is to cover with HDPE and leave the contaminated soil in then at best the remediation permit will be deferred until closure of the facility
- Any area outside of the facility will need to be addressed for revegetation, so a gypsum and caliche treatment is zone is not acceptable.

Let me know if you have any question or would like to discuss this further.

Thanks

Ryan Mann  
Remediation Specialist  
Field Operation Division  
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(505) 699-1989  
New Mexico State Land Office  
2827 N. Dal Paso Suite 117  
Hobbs, NM 88240

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**From:** Chan Patel [<mailto:chan.patel@entechservice.com>]

**Sent:** Monday, April 30, 2018 10:02 AM

**To:** Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>; Mann, Ryan <[rmann@slo.state.nm.us](mailto:rmann@slo.state.nm.us)>

**Cc:** 'Les Teague' <[Les.Teague@cjes.com](mailto:Les.Teague@cjes.com)>

**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)

Hi Mark

Thanks for updating me on the person who is reviewing the Investigation Report for the above referenced site on behalf of NMSLO.

Hi Ryan

Upon your review of the Investigation Report and the technical approach to address the release, should you have any questions or concerns, please do not hesitate to contact us. Additionally both the CJES Environmental Director and I are available for a conference call and if necessary meet with you to discuss the report and technical approach.

Regards

Chan Patel

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**From:** Naranjo, Mark [<mailto:MNaranjo@slo.state.nm.us>]  
**Sent:** Monday, April 30, 2018 9:06 AM  
**To:** 'Chan Patel'  
**Cc:** Mann, Ryan  
**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)

Good morning Chan,

I have forwarded the emails to Ryan Mann, he is now the NMSLO remediation specialist. Thank you.

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**From:** Chan Patel [<mailto:chan.patel@entechservice.com>]  
**Sent:** Friday, April 27, 2018 10:40 AM  
**To:** 'Yu, Olivia, EMNRD' <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Cc:** Naranjo, Mark <[MNaranjo@slo.state.nm.us](mailto:MNaranjo@slo.state.nm.us)>; 'Les Teague' <[Les.Teague@cjes.com](mailto:Les.Teague@cjes.com)>  
**Subject:** RE: State AB #1 SWD Facility- Investigation Report (1RP-4836)

Hi Olivia

I just wanted to give you a quick update to the above referenced site. We have sent a copy of the Investigation Report to Mark Naranjo with State Land Office (SLO), the landowners of the Site, to give them an opportunity to review the report and our approach to address the releases at the site.

Upon receipt of their comments, we will be send you the report for your review.

Regards

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