

**From:** [Yu, Olivia, EMNRD](#)  
**To:** [Krehbiel, Brett](#); [Billings, Bradford, EMNRD](#); [Mann, Ryan](#)  
**Cc:** [Darrow, Melisa](#); [Cutshall, Greg](#); [Barnhill, Amy D.](#); [Michelson, Jason C](#)  
**Subject:** RE: Planned 2018 Remediation Activities – Scope of Work for Moran 2-6  
**Date:** Thursday, July 26, 2018 2:41:00 PM  
**Attachments:** image001.png

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Mr. Krehbiel:

Thank you for the reminder. Please be advised that

1. Any subsequent reclamation and applicable revegetation requirements, after addressal of the impacted release area, are under the purview of NMSLO.
2. Sidewall samples are collected generally at mid-depth of the excavation or near the surface to complete lateral definition of the impacted area.

NMOCD will grant approval to the proposed remediation plan for 1RP-3657 on the condition that discrete bottom and sidewall confirmation samples are submitted for laboratory analyses at no greater than 50 ft. apart. Composite samples are not recommended for this location. Current base of excavation will need to be resampled. Dated photo documentation of the remediation process, including proper emplacement of a liner, will be required. Please confirm or inform for clarification.

NMSLO like approval required in addition to other concerns and stipulations.

Thanks,  
Olivia

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**From:** Krehbiel, Brett <Brett.Krehbiel@arcadis.com>  
**Sent:** Wednesday, July 25, 2018 1:32 PM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Mann, Ryan <rmann@slo.state.nm.us>  
**Cc:** Darrow, Melisa <Melisa.Darrow@arcadis.com>; Cutshall, Greg <Greg.Cutshall@arcadis.com>; Barnhill, Amy D. <ABarnhill@chevron.com>; Michelson, Jason C <JMichelson@chevron.com>  
**Subject:** RE: Planned 2018 Remediation Activities – Scope of Work for Moran 2-6

Good afternoon Ms. Yu:

Per Arcadis' Response to Comments letter on behalf of Chevron, dated June 28, 2018, we are respectfully requesting concurrence from NMOCD to proceed as outlined. Please let me know if you have any additional questions or comments.

Thank you!

**Brett Krehbiel** | Certified Project Manager | [Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)  
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**From:** Krehbiel, Brett  
**Sent:** Friday, June 29, 2018 1:44 PM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Darrow, Melisa <[Melisa.Darrow@arcadis.com](mailto:Melisa.Darrow@arcadis.com)>  
**Cc:** Cutshall, Greg <[Greg.Cutshall@arcadis.com](mailto:Greg.Cutshall@arcadis.com)>; Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; [ABarnhill@chevron.com](mailto:ABarnhill@chevron.com)  
**Subject:** RE: Planned 2018 Remediation Activities – Scope of Work for Moran 2-6

Good afternoon Ms. Yu:

Attached, please find *Response to Comments* regarding the proposed remediation plan for 1RP-3657. Please let me know if you have any additional questions or comments.

Thank you,

**Brett Krehbiel** | Certified Project Manager | [Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)  
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**From:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>  
**Sent:** Friday, June 15, 2018 1:56 PM  
**To:** Darrow, Melisa <[Melisa.Darrow@arcadis.com](mailto:Melisa.Darrow@arcadis.com)>  
**Cc:** Cutshall, Greg <[Greg.Cutshall@arcadis.com](mailto:Greg.Cutshall@arcadis.com)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>; Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; [ABarnhill@chevron.com](mailto:ABarnhill@chevron.com)  
**Subject:** RE: Planned 2018 Remediation Activities – Scope of Work for State A-10 and Moran 2-6

Mr. Krehbiel/Michelson:

Please address these comments regarding the proposed remediation plan for 1RP-3657:

1. Please verify whether this location will be undergoing reclamation or remediation of the impacted tank battery area. If reclamation, please be advised that the proposed plan of 12

inch lifts to compact the soil “suitable for drill rig operations” will not allow re-vegetation to occur.

2. Where was the stockpiled soil from? If from a prior excavation of the affected area, please note that this ‘backfill’ will need to be tested every 50 cubic yards for BTEX, TPH extended, and chlorides.
3. Generally, NMOCD does not approve of soil blending.
4. Will the soil bore at sample location F be outside of the tank battery boundary? In other words, would the proposed 4 ft. excavation and liner emplacement activities for the tank battery area occur independently of the soil borehole activities? According Figure 1, the current dimensions of the excavation is South of Sample Location F. Please be advised that NMOCD recommends the completion of vertical delineation before the emplacement of a properly keyed 40 mil liner at 4 ft. bgs, if Sample Location F is within the boundary of the area to be lined.
5. Confirmation sidewalls are required of the proposed excavated area. If the soil is hydrocarbon-impacted at the base of the excavation, NMOCD suggests that a buffer of sand be laid between the plastic liner and the affected soil to delay liner degradation.
6. Soil bore logs, dated photo documentation, and GPS coordinates of confirmation sample locations will be required.

Also, please note that permissible limit of TPH extended (GRO, DRO, and MRO) is total of 100 mg/kg, not 100 mg/kg for each fraction.

Comments regarding 1RP-3637 will be sent in a separate email.

Thanks,  
Olivia

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**From:** Darrow, Melisa <[Melisa.Darrow@arcadis.com](mailto:Melisa.Darrow@arcadis.com)>

**Sent:** Thursday, May 31, 2018 10:34 AM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>

**Cc:** Cutshall, Greg <[Greg.Cutshall@arcadis.com](mailto:Greg.Cutshall@arcadis.com)>; Krehbiel, Brett <[Brett.Krehbiel@arcadis.com](mailto:Brett.Krehbiel@arcadis.com)>; Michelson, Jason C <[JMichelson@chevron.com](mailto:JMichelson@chevron.com)>; [ABarnhill@chevron.com](mailto:ABarnhill@chevron.com)

**Subject:** Planned 2018 Remediation Activities – Scope of Work for State A-10 and Moran 2-6

Good Morning,

Attached, please find electronic copies of the planned 2018 Remediation Activities – Scope of Work for the State A-10 and Moran 2-6 Sites, located in Lea County, New Mexico. A hard copy will be mailed today for delivery next week in addition to the electronic versions for your approval. Following concurrence, Arcadis will commence field activities described in the respective documents. Please contact myself or Brett Krehbiel if you have any questions or comments.

Thank you,

**Melisa Phan Darrow** | Staff Scientist | [melisa.darrow@arcadis.com](mailto:melisa.darrow@arcadis.com)  
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