From: Mann, Ryan

To: Yu, Olivia, EMNRD; "Krehbiel, Brett"; Billings, Bradford, EMNRD

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: Tuesday, July 31, 2018 12:36:29 PM

Attachments: image001.png

I just spoke with Mr. Krehbiel about the activities currently taking place at the location. In the interest of moving forward I agree to relent on importing topsoil and revegetation of the tank battery at this time.

However, this does not influence the fact the site, at least attempted, be restored it to prior condition since the since the site is abandoned. Mr. Michelson/Ms. Barnhill can you please inform of the plan for this site after the remediation process is completed?

Ryan Mann Remediation Specialist Field Operation Division (575) 392-3697 (505) 699-1989 New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88240

From: Mann, Ryan

Sent: Tuesday, July 31, 2018 12:10 PM

To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>; Krehbiel, Brett <Brett.Krehbiel@arcadis.com>; Billings, Bradford, EMNRD <Bradford.Billings@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

All,

Because the well is plugged and the site is abandoned, the entire site should undergo remediation if necessary and restoration/revegetation per NMAC 19.2.100.67. Ideally, the entire caliche pad should be removed since the site is now empty. However, at a minimum the new material brought in and placed at the former battery site should to topsoil. This area will also need a revegetation plan to be included in the workplan. Please let me know if you have any questions.

Ryan Mann
Remediation Specialist
Field Operation Division
(575) 392-3697
(505) 699-1989
New Mexico State Land Office
2827 N. Dal Paso Suite 117

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Thursday, July 26, 2018 2:41 PM

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

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

From: Krehbiel, Brett

Sent: Wednesday, July 25, 2018 1:32 PM

To: Yu, Olivia, EMNRD; 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

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 | <u>Brett.Krehbiel@arcadis.com</u> **Arcadis |** Arcadis U.S., Inc.

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Be green, leave it on the screen.

From: Krehbiel, Brett

Sent: Friday, June 29, 2018 1:44 PM

To: Yu, Olivia, EMNRD < <u>Olivia.Yu@state.nm.us</u>>; Darrow, Melisa < <u>Melisa.Darrow@arcadis.com</u>> **Cc:** Cutshall, Greg < <u>Greg.Cutshall@arcadis.com</u>>; Michelson, Jason C < <u>JMichelson@chevron.com</u>>;

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 **Arcadis |** Arcadis U.S., Inc. 101 Creekside Ridge Court Suite 200, Roseville, CA | 95678 | USA T. +1 916 786 5382 | M. +1 432 312 7687

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From: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Sent: Friday, June 15, 2018 1:56 PM

To: Darrow, Melisa < Melisa. Darrow@arcadis.com >

Cc: Cutshall, Greg < <u>Greg.Cutshall@arcadis.com</u>>; Krehbiel, Brett < <u>Brett.Krehbiel@arcadis.com</u>>;

Michelson, Jason C < JMichelson@chevron.com; 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

From: Darrow, Melisa < Melisa. Darrow@arcadis.com >

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

To: Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us>

Cc: Cutshall, Greg < <u>Greg.Cutshall@arcadis.com</u>>; Krehbiel, Brett < <u>Brett.Krehbiel@arcadis.com</u>>;

Michelson, Jason C < <u>JMichelson@chevron.com</u>>; <u>ABarnhill@chevron.com</u>

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 Arcadis | Arcadis U.S., Inc.

410 North 44th Street, Suite 1000 Phoenix, Arizona | 85008 | USA T. +1 602 797 4529 | M. +1 602 810 5547

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