From:	Yu, Olivia, EMNRD
To:	<u>"Jim Foster"</u>
Cc:	Amir Sanker; Ryan Mersmann
Subject:	RE: Jay Management Bagley Trunkline Report
Date:	Tuesday, September 11, 2018 4:16:00 PM
Attachments:	image001.png
	reviewed_1RP5191_Bagley Field Trunlkine Release Report Final.pdf

Mr. Foster:

Remediation identifier 1RP-5191 has been assigned to this release.

Notes:

- GPS coordinates as written are incorrect. Provide release location in degree or decimal units.
- Please be advised that depending on the lateral extent of the release area, a windmill (freshwater well) is approximately 1000 ft. SW of the location of the pipeline release.
- Were the spoil piles removed or placed on a plastic liner with berms to prevent enlargement of the impacted area?

Based on the data presented, release characterization is not completed for 1RP-5191.

- 1. The areas represented by SB1, SB2, and SB6 will require additional vertical delineation as the depth to groundwater is less than 50 ft. bgs. Soil samples must be tested for TPH extended and chlorides using the methodologies and protocols specified in revised 19.15.29 NMAC.
- 2. NMOCD expects that delineation is completed using a drilling rig. Submit field data for all soil samples submitted for laboratory analyses and for all the depths, of which samples were not.
- 3. Due to the age of the release and shallow depth of groundwater, NMOCD requests that a soil sample 2 ft. below the depth at which sample is determined to be within permissible levels be collected and sent for laboratory analyses. For example, if permissible levels of chlorides and or TPH extended are obtained at 10 ft. bgs, then collect another sample at 12 ft. bgs for verification at each soil bore location.
- 4. Mark soil bore locations and dimensions of the release area with GPS coordinates, as well as other pertinent site characteristics on an appropriately scaled map as per 19.15.29 NMAC.
- 5. Provide dated, geo-referenced photo documentation for delineation and remediation activities.

Please be mindful of the timelines. A completed site/release characterization report with proposed remediation plan is due on November 12, 2018 for 1RP-5191.

Please confirm or inform for clarification.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 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: Jim Foster <jim@teamtimberwolf.com>
Sent: Thursday, August 23, 2018 3:02 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Amir Sanker <asanker@isramco-jay.com>; Ryan Mersmann <ryan@teamtimberwolf.com>
Subject: Jay Management Bagley Trunkline Report

Olivia,

Please find attached the *Assessment Report and Remedial Action Plan*, dated September 4, 2015. The report and remedial action plan were prepared following a produced water release on the Bagley Field Truckline. This report was submitted to the OCD in 2015; however, Jay Management has not received any OCD correspondence regarding this project.

Jay Management plans to move forward with the proposed remedial actions pending OCD approval. Please let me know if you have any questions or need anything further.

Thank you,

Jim Foster



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