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By OCD Dr Oberding at 7:55 am, Jan 30, 2017

2057 Commerce Drive
Midland, TX 79703

432.520.7720 PHONE
432.520.7701 FAX

www.TRCSolutions.com

October 31, 2016

APPROVED

By OCD Dr Oberding at 8:18 am, Jan 30, 2017

Dr. Tomas Oberding
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Addendum to the Interim Remediation Summary and Revised Proposed Soil Closure Strategy
Monument #18
Unit Letter "D", Section 07, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico
Plains SRS # TNM Monument 18-Known
NMOCD Reference # 1RP-0124

Dear Dr. Oberding,

TRC Environmental Corporation (TRC), formerly NOVA Safety and Environmental (NOVA), on behalf of Plains Marketing, L.P., (Plains), has prepared this *Addendum to the Interim Remediation Summary and Revised Proposed Soil Closure Strategy* (Addendum) for the Release Site known as TNM Monument 18-Known (Monument 18).

On June 5, 2015, Plains submitted the *Interim Remediation Summary and Revised Proposed Soil Closure Strategy* (2015 Workplan) dated May 6, 2015, to the New Mexico Oil Conservation Division (NMOCD) Office in Santa Fe, New Mexico. The 2015 Workplan was designed to advance the Monument 18 Release Site toward an NMOCD approved soil closure. On November 3, 2015, the NMOCD Santa Fe Office approved the 2015 Workplan as written. Please reference the *Interim Remediation Summary and Revised Proposed Soil Closure Strategy* dated May 6, 2016, for additional details.

On October 4, 2016, a Plains Representative met with the Landowner to discuss the current status of the Project and a time table for future work at the Site. During the meeting, the Landowner expressed several requests, which extend beyond the scope of the NMOCD approved 2015 Workplan and are more stringent than the NMOCD regulatory guidelines.

During the October 4, 2016 meeting, the Landowner requested the following modifications to the NMOCD approved 2015 Workplan:

- Concentrations of Total Petroleum Hydrocarbon (TPH) previously identify in the west sidewall of the excavation will be excavated to the west (Western Expanded Excavation). Excavation

activities to the west of the existing west sidewall may require encroachment into the Lea County Road 41 (Maddox Road) right-of-way and asphalt roadway.

- Excavate limited hydrocarbon stain at the groundwater interface on the east sidewall of the existing excavation (Eastern Expanded Excavation).
- Excavate limited hydrocarbon stain at the groundwater interface along the south sidewall of the existing excavation (South Expanded Excavation).

Based on the Landowner requests, Plains is submitting this Addendum to the NMOCD to outline the activities required to complete the above requested tasks.

- The Xcel powerlines, located adjacent to the existing excavation on the east right-of-way (ROW) of Maddox Road will be relocated to the ROW on the west side of Maddox Road. All required permitting and approvals will be in place prior to the relocation of the powerlines.
- The previously submitted and NMOCD approved *Interim Remediation Summary and Revised Proposed Soil Closure Strategy* (2015 Workplan) dated May 6, 2015, referenced the placement of approximately one (1) foot of gravel or equivalent material to be placed on the floor of the existing excavation. Plains proposes to place approximately one (1) foot of gravel or equivalent material on the floor of the existing excavation and the floors of the proposed Eastern, Western, and Southern Expanded Excavations. In addition, a permeable geotextile liner will be installed on top of the gravel or equivalent material, to separate the gravel from the backfill material. A six (6) inch layer of sand will be placed on top of the liner to maintain the integrity of the liner during backfilling activities.
- Plains proposes that the overburden on the east sidewall of the excavation will be excavated from the surface to approximately eighteen to nineteen (18-19) below ground surface (bgs). The overburden will be stockpiled and sampled for potential use as backfill. Following the removal of the overburden, a track hoe will be placed on a platform to allow for excavation of the Eastern Expanded Excavation to approximately twenty-nine (29) feet bgs. As above, this excavated material will be stockpiled and sampled to determine the analytical status of the soil.
- On approval, following the excavation of the Eastern Expanded Excavation, the existing excavation and the Eastern Expanded Excavation will be partially backfilled to approximately eighteen to nineteen (18-19) feet bgs with non-impacted material purchased from the Landowner or stockpiled soil deemed acceptable by analysis. The backfill soil will be sloped away from the west and south sidewalls of the existing excavation to allow for additional excavation activities associated with the Western and Southern Expanded Excavations, as requested by the landowner.
- Following the partial backfilling of the existing excavation, the hydrocarbon stain will be excavated from the west sidewall of the existing excavation (Western Expanded Excavation). The Western Expanded Excavation will commence at the northern extent of the west sidewall and proceed to the south. As the Western Expanded Excavation proceeds and areas along the west sidewall are excavated, sampled, and the analytical results are deemed acceptable to the

NMOCD and the Landowner, the areas will be backfilled to grade with soil deemed acceptable to the landowner and NMOCD or with non-impacted soil purchased from the Landowner. Plains anticipates this “excavate and backfill” strategy in the western Expanded Excavation may allow pipelines, operated by other operators to be relocated to the previously backfilled existing excavation. Plains will request the pipeline operators input and approval prior to the relocation of any pipeline.

- On completion of the activities in the Western Expanded Excavation, activities will continue into the Southern Expanded Excavation, utilizing the above stated “excavate and backfill” strategy.
- Excavation of the impacted soil in the Eastern, Western, and Southern Expanded Excavation areas will continue until visual, olfactory and/or analytical results indicate concentrations of TPH and BTEX are less than the NMOCD regulatory guidelines and/or Landowner requested levels.
- As stated above, all excavated soil will be stockpiled adjacent to the excavation and a composite soil sample of each 500 cubic yards (cy) of soil will be collected, submitted to the laboratory, and analyzed for concentrations of TPH and BTEX. Based on the analytical results and with Landowner and NMOCD approval, the stockpiled material will be utilized as backfill or transported under manifest to C&C Landfarm for disposal.

Following all excavation activities, with Landowner and NMOCD approval, the existing and expanded excavations will be backfilled to grade. Following the backfilling of the existing excavation to grade, pipelines which were previously rerouted from the pipeline corridor will be re-established in the pipeline corridor, with operator approval.

Concurrent with the above activities, a caliche road may be constructed to allow vehicle traffic to be diverted off of Maddox Road. The route of the detour caliche road has not been established as date. Permits and approvals will be secured prior to the commencement of work. Plains is actively communicating with the Lea County Road Department in the planning of these activities.

Plains will provide traffic barricades, signage and “flaggers”, as necessary to detour vehicle traffic around the work area.

Following the completion of the remedial activities, Maddox Road will be re-established to Lea County Road Department specifications and the detour road will be removed.

Following the completion of all above stated activities, the Site will be revegetated with a seed type approved by the Landowner and seeded at a time specified by the Landowner.

During the course of the excavation activities, some groundwater monitor wells may be damaged or removed and may require re-installation. Following the excavation activities, damaged monitor wells will be repaired or replaced, if required.

A “*Remediation Summary and Soil Closure Request*” will be prepared on the conclusion of the soil remediation and reclamation activities and submitted to the NMOCD for approval.

Groundwater monitoring activities will continue and monitor wells will be sampled on a schedule approved by the NMOCD. An "Annual Monitoring Report" will be submitted to the NMOCD before April 1st of each year.

Plains is prepared to begin the activities outlined in this Addendum on NMOCD and Landowner approval.

TRC has prepared this *Addendum to the Interim Remediation Summary and Revised Proposed Soil Closure Strategy* to the best of its ability. No other warranty, expressed or implied, is made or intended. TRC has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. TRC has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. TRC has prepared this report, in a professional manner, using the degree of skill and care exercised by similar environmental consultants. TRC also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

This report has been prepared for the benefit of Plains. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of TRC and/or Plains.

If you have any questions, or if additional information is required, please feel free to call me at 432-520-7720 (office) or 432-559-3296 (cell) or Camille Bryant (Plains) at 575-441-1099.

Respectfully submitted,



Curt D. Stanley
Senior Project Manager
TRC Environmental Corporation



Jeffrey Kindley, PG
Senior Project Manager
TRC Environmental Corporation

cc: Dr. Tomas Oberding, NMOCD - Santa Fe
NMOCD - Hobbs District Office
Jeff Dann, Plains Marketing, L.P.
Camille Bryant, Plains Marketing, L.P.
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