

From: Yu, Olivia, EMNRD
To: "Slade, Rose"
Cc: Oberding, Tomas, EMNRD
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)
Date: Friday, May 5, 2017 3:30:00 PM
Attachments: image001.png

Ms. Slade:

Thank you for your thoroughness regarding IRP-4278. I missed this additional point from March 3, 2017 in the email thread. Yes, please properly set a 20 mil liner with the below specified dimensions at Floor 3c at 34 ft. bgs before the installation of the temporary monitoring well.

Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Friday, May 5, 2017 1:52 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Ms. Yu,

My family is doing well, thank you for asking.

Just for my clarification purposes, I wanted to make sure I understood your response correctly before proceeding with the backfilling and process of installation of the temporary monitor well.

Back on May 5, 2017, I responded with the plan of action below via email and I noticed in your email below there was no mention of the request to install a 20 mil polyethylene liner at approximately 18' bgs which would be approximately 75' in length and 70' width and centered on soil sample floor-3c@34'. Is the NMOCD (you) okay with this request? We will need to complete this task prior to the installation of the temporary monitoring well, so I wanted to verify that with you prior to beginning this task and providing the landowner with an update status of the project.

I appreciate your patience and your willing to work with me on this remediation project.

Respectfully,
Rose Slade

ETC proposes the following plan of action:

- Install a two-inch diameter temporary monitoring well, for a minimum of 48 hours, in the vicinity of soil sample Floor-3c @ 34' with the New Mexico Office of the State Engineer (NMOSE) approval. Installation of the monitor well will require the southwest one-third of the excavation to be backfilled to a depth of approximately 18' bgs, where a PVC conduit will be installed during backfill activities for drilling purposes.
- Installing a 20 mil polyethylene liner at approximately 18' bgs which will be approximately 75' in length and approximately 70' width and centered on soil sample Floor-3c @ 34'.

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, May 05, 2017 11:12 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Good morning Ms. Slade:

I hope you and your family are well. In response to your points below for IRP-4278:

1. NMOCD approves of the temporary monitoring well permit to NMOSE.
2. Please keep NMOCD informed about the status of the groundwater monitoring project.
3. Backfill approval is granted only for the areas that are no longer impacted and necessary for the installation of the temporary monitoring well.
4. Remediation approval is applicable only for specified IRP. Even though the West excavation is adjacent, a separate IRP was issued; hence, the remediation procedure is specific only to that IRP.

Please let me know if you have other questions/want clarification.

Thanks and have a relaxing weekend,
Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Tuesday, May 2, 2017 3:11 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Good afternoon Ms. Yu,

Please accept my apologies for not responding sooner to your email. I had a family emergency and have been out of the office.

In regards to your concerns below, please find my answers to your questions in green font below.

Respectfully,
Rose Slade

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Friday, April 14, 2017 4:59 PM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Dear Ms. Slade:

Please address these concerns regarding the proposed remediation activities for IRP-4278:

- What is the status of the permit for the proposed temporary monitoring well? Has NMOSE provided permission? **ETC was awaiting the approval from NMOCD to install the temporary monitoring well prior to submitting for the permit from the NMOSE. ETC will now submit for the permit to the NMOSE with your approval.**
- Given the elevated TPH values for Floor 3c at 34 ft. bgs, NMOCD request that the monitoring well extend to the water table for an indeterminate amount of time until groundwater quality is assessed. **Based upon the detection of elevated TPH concentration at 34' bgs and at the request of the NMOCD, ETC will install a temporary groundwater monitoring well to evaluate the status of the groundwater at the site.**
- What is the proposed groundwater remediation plan, if elevated levels of TPH are detected? Upon installing the temporary groundwater monitoring well and collecting the necessary data, ETC will prepare a *Groundwater Investigation Summary* to be submitted to the NMOCD, detailing field activities and laboratory analytical results from collected samples. In the event groundwater is affected above NMOCD Regulatory Standards, the installation of additional groundwater monitoring wells may be necessary to further characterize the site prior to development and implementation of a *Groundwater Remediation Plan*. Groundwater investigation and/or remediation will be conducted in accordance with NMOCD and/or WQCC Regulatory Standards, if applicable.

Dependent on the responses to these concerns, NMOCD may provide partial backfilling approval of the excavated area for the installation of the groundwater monitoring well for IRP-4278. Backfilling approval for one RP does not transfer to another RP. **Does this mean ETC has the approval to partially backfill the opened excavation in order to install the temporary monitoring well?**

May I ask why we are not granted approval to backfill the rest of the opened excavation if the other side of the opened excavation is deemed cleaned per NMOCD guidelines?

I appreciate you in working with me on this project, and just to let you know I will be in that region next week, if your schedule allows to come out to one of my remediation sites and see how ETC operates in their remediation efforts we would like to extend our invitation for you to come out. Please let me know if you're interested, and I can give you my schedule for next week with dates, times, and locations.

Have a great rest of the day,

Respectfully,



Rose Slade
Sr. Environmental Specialist
800 East Sonterra Suite 2
San Antonio, TX. 78258
210-403-6525 / 432-940-5147

*"she is clothed with dignity and laughs without fear of the future" * Proverbs 31:25*

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCB 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, OCB approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]
Sent: Monday, March 13, 2017 7:41 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Good morning Ms. Yu,

Hope you had a good weekend.

Please find attached the answers to your concerns in regards to the Boyd 4-inch East (RP#4278) listed below.

If you have any additional concerns or require additional information, please do not hesitate to call/email me.

Hope you have a great day,

Respectfully,



Rose Slade
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210-403-6525 / 432-940-5147

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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, March 03, 2017 8:39 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: RE: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Good morning Ms. Slade:

Dr. Oberding and I reviewed the site assessment report for IRP-4278. Please address these concerns:

1. What is the current status of the site (Boyd 4 inch East)? Please provide a synopsis of the depth of excavation for each of the areas already delineated and proposed plan of action.

The current status of the Boyd 4-inch is "on hold" until NMOCD approval with or without conditions are issued by a NMOCD representative. The northwest two-thirds (2/3) of the excavated area is approximately twenty (20) feet bgs and spans an area of approximately 4,490 sq. ft. of the excavation. The excavated area located in the southwest one-third (1/3) of the excavated area is approximately 30' bgs and spans an area of approximately 2,530 sq. ft. In addition, an investigation trench was vertically advanced to approximately 34 feet bgs in the southwest one-third where hydrocarbon impact was discovered. The hydrocarbon impacted area measures approximately 30 feet by 50 feet.

The northeast two-thirds of the excavated area has been delineated vertically to chloride concentrations ranging from 13.2 mg/Kg for soil sample Floor-4 @ 20' to 299 mg/Kg for soil sample Floor-1 @ 20'. Horizontal delineation activities indicated chloride concentrations ranged from 294 mg/Kg for soil sample East Wall-1a @ 19' to 297 mg/Kg for soil samples North Wall-1 @ 20' (which was inaccurately labeled and was collected at approximately 19' bgs). TPH and BTEX concentrations for all collected soil samples in the northeast two-thirds of the excavated area were below laboratory detectable limits.

The southwest one-third of the excavated area has been vertically delineated to chloride concentrations of 44.1 mg/Kg for soil sample Floor-3c @ 30'. Horizontal delineation activities indicated chloride concentrations were 54.4 mg/Kg for soil sample Northwall-2 @ 29', 301 mg/Kg for soil sample West Wall-1 @ 29', 220 mg/Kg for SouthWall-1 @ 29', and 645 mg/Kg for East Wall-1 @ 645 mg/Kg. Horizontal delineation activities indicated TPH and BTEX concentrations were below laboratory detection limits for soil samples Northwall-2 @ 29', Southwall-1 @ 29', East Wall-3 @ 29', and West Wall-1 @ 29'. Vertical delineation activities indicated TPH concentrations were 2,283 mg/Kg for soil sample Floor-3c @ 34'. BTEX constituent concentrations for soil sample Floor-3c @ 34' was below laboratory detection limits for benzene, ethylbenzene, and xylene, with toluene exhibiting a concentration of 0.00324 mg/Kg.

ETC proposes the following plan of action:

- Install a two-inch diameter temporary monitoring well, for a minimum of 48 hours, in the vicinity of soil sample Floor-3c @ 34' with the New Mexico Office of the State Engineer (NMOSE) approval. Installation of the monitor well will require the southwest one-third of the excavation to be backfilled to a depth of approximately 18' bgs, where a PVC conduit will be installed during backfill activities for drilling purposes.
- Installing a 20 mil polyethylene liner at approximately 18' bgs which will be approximately 75' in length and approximately 70' width and centered on soil sample Floor-3c @ 34'.
- Backfilling the northeast two-third of the excavated area with locally obtained top soil/caliche to surface.

Please note, the landowner has given verbal approval to backfill the Boyd 4" East Release Site (IRP-4278).

2. The area around Floor 3 area has not been completely delineated according to NMOCD guidelines. Due to the depth to groundwater and levels of TPH at 34 ft. bgs, NMOCD request a complete vertical delineation for Floor 3 area until permissible levels are obtained and maintained for an additional 10 ft. bgs. If necessary, a temporary monitoring well can be established for 48 hours.

See the response given in bullet point 1.

3. The approved workplan from October 24, 2016 included in the report refers to Boyd 4 inch West (IRP-4277). Please confirm whether this has been included mistakenly. NMOCD does not have a record of prior approval to backfill

any portion related to IRP-4278.

As a result of initial delineation activities conducted on March 8, 2016 and the close proximity of the Boyd 4-Inch West (IRP-4277) and Boyd 4-Inch East (IRP-4278), the Boyd 4-Inch West is referenced in the Boyd 4-Inch East Closure Request. Please see the attached document for the email approval provided by Kristen Lynch which approved the Boyd 4-Inch West backfill. In addition, the digital document with Kristen's approval can be found on the OCD Online Imaging Section under the "IR-Remediation Permit - Hobbs - (IRP)" utilizing the "Order Number" of 4278 which can also be found here -> http://secure-web.cisco.com/16KKZlgmCQNOX1G4FShpusVyekdfhmCB-Qovx7-xKVfARkDa3sv5tIA2lJeu5biixHYbc1UE5dSFj94aQ3wwNmp7qNVaQHRyY1frxsGualcweisoXb_mkAX6yrkM0TMTmf3ogQzrvqI4L-gXUyIOcgH70fkqCD1yPU0JKwnGoRvWeEeGHFrntFhX-hZQac6vW5rHx0t017G4lFxbXlgRU84TT-9DfLjJOAD5ynGjG0REyDGoPEcEqkd48efcc8BIng1k75ANdSqCghocM1fm5pbbXCgwZkk8Mc1nyPa7aYm-iMVxhRvhc5Qhx9S/http%3A%2F%2Focdimage.emnrd.state.nm.us%2Fimaging%2FAEOrderFileView.aspx%3FappNo%3DpjXK1613344207 I have also attached a copy of that backfill approval with the email.

4. Reiterate the location, extent, and depth of proposed liner.

See the response given in bullet point 1.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
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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: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]
Sent: Monday, February 13, 2017 12:58 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Subject: Boyd 4 inch Risk Based Closure Request (IRP#4278)

Ms. Yu,

As stated in my previous email please find attached the Remediation Summary, Risk Based Soil Strategy Proposal, and Site Closure Request for the Boyd 4-inch Historical East Release Site with IRP# 4278.

Please note, the disposal tickets for the soil that has been properly disposed of are not attached to the report due to the size of the file. I will have those files with me at our scheduled meeting next week.

If you have any questions or need additional information, please feel free to call/email me.

Have a great day, and I look forward to meeting you next week.

Respectfully,

Rose Slade



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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.