

From: [Yu, Olivia, EMNRD](#)
To: ["John.Ferguson@ghd.com"](mailto:John.Ferguson@ghd.com); [Billings, Bradford, EMNRD](#)
Cc: ["Camille Bryant"](#); tom.larson@ghd.com
Subject: RE: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area
Date: Friday, August 4, 2017 8:15:00 AM

Good morning Mr. Ferguson:

Thank you for the provided data. NMOCD grants backfill approval for the excavated areas pertaining to 1RP-4679. NMOCD looks forward to the remediation report with final C-141 and all relevant documentation for closure.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
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: John.Ferguson@ghd.com [mailto:John.Ferguson@ghd.com]
Sent: Thursday, August 3, 2017 2:51 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Camille Bryant' <CJBryant@paalp.com>; tom.larson@ghd.com
Subject: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area

Dear Ms. Yu,

Per your email dated July 25, 2017, 4 confirmatory sidewall samples were collected on July 27, 2017, from each of the over excavated areas at DS-3 and DS-7 locations and confirmation bottom samples were previously collected from the same areas on June 22, 2017. Review of all delineation and confirmation sample results indicates BTEX and TPH concentrations are below RRAL's determined for the Site and GHD requests the NMOCD's permissions to backfill the scraped/excavated areas. The reason for requesting approval to backfill at this time is so that Plains' groundwater remediation system can be brought back into operation shortly after backfilling & restoration activities are completed. Attached is Figure 3 which depicts the scraped/over excavated areas, delineation & confirmation sample locations, collection dates, depths, and analytical results.

Prior to backfilling activities, the landowner will be contacted for backfill material and restoration requirements. Subsequent to backfilling and restoration, a concise remediation report consisting of site activities, detailed figures, tables, photos, analytical results, and a request for closure will be submitted.

After review, please send reply email with approval to backfill for the remediation report and project file. Also, please contact me if you have questions or comments.

Best Regards,

John M. Fergerson, PG

GHD

T: +1 432 686-0086 | D: +1 432 203-8667 | M: +1 432 488-7907 | E: john.fergerson@ghd.com
2135 S. Loop 250 West, Midland, Texas 79703 USA | www.ghd.com
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From: [Yu, Olivia, EMNRD](#)
To: ["Ferguson, John \(Midland\)"; "Camille Bryant"](#)
Cc: [Larson, Thomas](#); [Project Email Filing](#); [Billings, Bradford, EMNRD](#)
Subject: RE: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area & for No Further Action ~COR-074685~
Date: Tuesday, July 25, 2017 1:29:00 PM

Dear Mr. Ferguson:

Thank you for following-up with 1RP-4679. After reviewing the photos, confirmatory laboratory samples for the sidewalls of DS-3 and DS-7 locations are still necessary to verify that TPH remains within permissible levels. Please be advised that NMOCD requires confirmatory bottom and sidewall samples for closure of any RP.

Thanks,
Olivia

From: Ferguson, John (Midland) [mailto:John.Ferguson@ghd.com]
Sent: Tuesday, July 11, 2017 1:14 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Camille Bryant' <CJBryant@paalp.com>
Cc: Larson, Thomas <tom.larson@ghd.com>; Project Email Filing <Filing-NA@ghd.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>
Subject: RE: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area & for No Further Action ~COR-074685~

Olivia,

Per our recent phone conversation, below are photos of the release area with impacted soil removed and photos of additional excavating of soil from DS-3 & DS-7 locations



Facing South: Impacted soil scraped along western edge of AST firewall



Facing ENE: Impacted soil scraped near NW corner of AST firewall



Facing ESE: Stained soil scraped along AST's north firewall



Facing SE: Stained soil scraped near NE corner of AST firewall and outside fenced area



Facing NW: Impacted soil scraped from release area



Facing North: Impacted soil scraped from release area



Facing South: Impacted soil scraped from northern boundary of release area



Facing South: Approximately 50 – 60 yards of impacted soil removed from release are



Facing NW: Additional excavating of impacted soil at DS-7 location on June 22, 2017. Confirmation sample was collected at bottom from 10-16"



Facing NNE & Down: Additional excavating of impacted soil at DS-3 location June 22, 2017. Confirmation sample was collected at bottom from 20-24".

After review, please contact me if you have further questions, comments, or concerns.

Regards,

John Ferguson
Project Manager

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

Sent: Friday, June 30, 2017 3:11 PM

To: Ferguson, John (Midland); 'Camille Bryant'

Cc: Larson, Thomas; Project Email Filing; Billings, Bradford, EMNRD

Subject: RE: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area & for No Further Action ~COR-074685~

Dear Mr. Fergerson:

Several questions regarding the submitted documents for 1RP-4679:

The provided figures and table indicate that delineation has been achieved. However, to what depth were the each of the sample locations excavated? NMOCD requires the submission of a concise remediation report detailing the depth of excavation, demarcation on a scaled map of excavated areas with depth differences, and documentation of sidewall and bottom confirmation samples before backfill approval.

Thanks,

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

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From: Fergerson, John (Midland) [<mailto:John.Fergerson@ghd.com>]
Sent: Wednesday, June 28, 2017 1:15 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; 'Camille Bryant' <CJBryant@paalp.com>
Cc: Larson, Thomas <tom.larson@ghd.com>; Project Email Filing <Filing-NA@ghd.com>
Subject: 074685 Plains-Darr Angell #2 Groundwater Remediation Site (1RP 4679) Request to Backfill Remediated Release Area & for No Further Action ~COR-074685~

Ms. Olivia Yu & Ms. Camille Bryant,

Via this email, I am requesting permission to backfill the remediated release area excavation located at the Plains-Darr Angell #2 Groundwater Remediation project site (Site) located in Lea County, NM. The Site is located on rural private land, owned by Mr. Darr Angell, in Section 11 (Unit O) and 14 (Unit B), Township 15 South, Range 37 East and the geographical coordinates are 33.024° N, 103.167° W. The depth to groundwater at the Site is approximately 65 feet below ground surface (bgs) which gives the Site a Total Ranking of 10 - 19. In addition, I am also requesting that no further action is required in regards to the release area for the closure report and project file.

On May 24, 2017, delineation soil sampling within the release area was conducted subsequent to removal of impacted soil. Analytical results indicated the TPH from DS-3 and DS-7 remained above the New Mexico Oil Conservation Division's (NMOCD) Recommended Remediation Action Levels (RRALs). On June 22, 2017, confirmation soil sampling was conducted subsequent to further removal of impacted soil in the areas of DS-3 & DS-7 sample locations. Analytical results indicated the TPH from DS-3 and DS-7 were well below RRALs. For both events, a total of approximately 60 yards of crude oil impacted soil were removed and stockpiled on plastic at the Site. Attached is a Topographic Map depicting the Site's location, an Aerial Image depicting the Site, a Detailed Site Map depicting sample locations/depths/soil analytical results, and analytical data table.

Upon your approvals, Darr Angell will be contacted so he can view the Site prior to backfilling, to determine the location of backfill material provided by him, and his restoration requirements.

Your timely responses are appreciated and please contact me if you have questions or comments.

Best Regards,

John M. Ferguson, PG

GHD

T: +1 432 686-0086 | D: +1 432 203-8667 | M: +1 432 488-7907 | E: john.fergerson@ghd.com
2135 S. Loop 250 West, Midland, Texas 79703 USA | www.ghd.com
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