

**From:** Heather Leven  
**To:** [Yu, Olivia, EMNRD](#)  
**Cc:** [Dena](#); [Billings, Bradford, EMNRD](#)  
**Subject:** RE: Summary of Phone Conference Between KJE and NMOCD  
**Date:** Thursday, March 15, 2018 1:16:20 PM  
**Attachments:** Table, Figure, and Lab Data for SS-02.pdf  
FW Spill Delineation Report Remediation Plan- Case Nos. 4497 4498.msg

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Ms. Yu,

While SS-02 appears to be more than 400 feet from the release point, it is located in the area of the highest chloride concentration. There was not a directive dictating that the soil boring must be advanced within a certain distance from the release point. I have attached the email correspondence previously provided to the NMOCD regarding Dr. Oberding's requirements for the sample in lieu of a monitoring well. As you can see by his directive, he indicated that he would like to see sampling from the deepest extent. KJE notes that nothing more was requested; however, as noted, moving forward we will carry out the request for sampling at least every 5 feet. As such and based on the provided information below and attached, we request that this spill be closed in the absence of an additional boring.

Please let me know if you require additional information or clarification. We appreciate your time and effort!!

Thanks,

Heather Leven, KJE  
Project Manager

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**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Thursday, March 15, 2018 1:27 PM  
**To:** Heather Leven <[heather@kjenvironmental.com](mailto:heather@kjenvironmental.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Dena <[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)>  
**Subject:** RE: Summary of Phone Conference Between KJE and NMOCD

Ms. Leven:

Given the data provided, NMOCD cannot grant full closure to 1RP-4498. Deferral is under consideration for the impacted area under the pipelines indicated on Figure A2, submitted on March 5, 2018. However, additional information is required to determine what will be deferred for future remediation when the pipeline(s) are inactive, retrofitted, or abandoned.

NMOCD requests an additional soil bore to document the chloride-impacted soil left for deferral due to the following reasons:

- SS-2 is approximately more than 400 ft. distance from the release point. **There was not a directive dictating that the soil boring selected for deepest delineation be within a certain distance from the release point.**

- SS-2 is also not in the area where the highest chloride concentration was detected at depth. SS-02 is in the area of the highest chloride exceedance (SB-39, maximum chloride concentration of 8,790 mg/kg at a depth of 6-8 feet bgs).
- SS-2 is not an extension of an existing soil bore with data up to 10 ft. bgs. The nearest soil bore to SS-2 is SB-39, more than 100 ft. Southwest from SS-2, based on GPS coordinates. SS-02 is an extension of SB-39 with existing soil data up to 14 feet bgs.
- Unless otherwise informed, there is no chloride data (field or lab) between the surface and maximum depth of SS-2 at 21 ft. bgs with 13.1 mg/kg chlorides. SS-02 was actually advanced to 24'8" feet bgs. While there is not soil data between 14 feet and 24'8", as with Spill 1, we will carry the request for soil data at least every 5 feet moving forward since the directive only requested the deepest soil sample.

Please inform or confirm for clarification. Bradford Billings, NMOCD Hydrologist must be informed and approved of the proposed placement of the additional soil bore location.

Thanks,  
Olivia

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**From:** Heather Leven [<mailto:heather@kjenvironmental.com>]  
**Sent:** Monday, March 5, 2018 9:32 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Dena <[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)>  
**Subject:** Re: Summary of Phone Conference Between KJE and NMOCD

Ms. Yu,

Please find attached, the figures for 1RP-4497 and -4498 as requested. Regarding #2, our understanding is that all work will be done in accordance with already approved plans, which includes a soil boring delineated vertically 10 feet beyond the known impact for purposes of potential groundwater characterization. As such, #2 will apply to future spills. For the spills that are outstanding, only one (1RP-4963) does not have an approved workplan. Regarding the full closure intent, KJE previously provided each exchange between KJE and the NMOCD. As we have stated, we have approached the remediation of each spill with the intent to receive closure, nothing else was ever discussed.

Additionally, regarding Spill 1 (1RP-4497), KJE is requesting to remove the fence and replace the liner within the excavation. Can you respond and indicate if we are allowed to do so at this time?

Thanks,

Heather Leven, KJE  
Project Manager

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

**Sent:** Wednesday, February 28, 2018 5:02 PM

**To:** Heather Leven <[heather@kjenvironmental.com](mailto:heather@kjenvironmental.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Cc:** Dena <[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)>

**Subject:** RE: Summary of Phone Conference Between KJE and NMOCD

Ms. Leven:

Thank you for the summary regarding 1RP-4497 and 1RP-4820. Several points of clarification:

- For #1, please demarcate on the map, SS-01 and SS-02 sample locations and release points. Pardon if I missed them.
- Is #2 proposed for 1RP-4497 and 1RP-4498 or in general?
- If available, please provide documentation of full closure intent for 1RP-4498 from the beginning. I asked Tomáš and he told me that he was not aware of this.

Olivia

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**From:** Heather Leven [<mailto:heather@kjenvironmental.com>]

**Sent:** Wednesday, February 28, 2018 3:23 PM

**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Cc:** Dena <[dena@kjenvironmental.com](mailto:dena@kjenvironmental.com)>

**Subject:** Summary of Phone Conference Between KJE and NMOCD

Good Afternoon,

Thank you for taking the time to conduct a phone conference. Below summarizes the agreed-upon actions/ conclusions moving forward:

- For Spills 1 and 2, KJE will provide a map that separates the blending areas for each respective spill.
- In lieu of groundwater monitoring wells, KJE will vertically delineate soil borings to depths 10 feet below the depth of the soil concentrations exhibiting concentrations below NMOCD approved criteria.
- NMOCD will not alter previously approved plans.
- NMOCD requests stockpile sampling be submitted for lab verification on a more frequent basis than 1 per every 200 cubic yards.
- NMOCD mandates that moving forward, all efforts must be made to advance borings beyond refusal. If a boring cannot be advanced to the mandated depth, KJE will notify NMOCD.
- NMOCD mandated 10 foot vertical delineation for 1RP-4820; however, two borings were only delineated to 5 and 6 feet respectively. NMOCD approved the vertical delineation to those depths and does not require further vertical delineation.
- KJE will collect the samples at 2.5 ft intervals and run laboratory analysis, as previously represented.
- KJE will add the release points to the maps.

- KJE will run TPH & BTEX at the point nearest to the release and/or gathering points at every interval and then in a manner sufficient to determine whether the constituents will be present, based on field judgment.
- KJE will provide data regarding the soil amendment to be considered as a remediation option, assuming there are sufficient studies to demonstrate post-remedial, long-term effects in similar environments.

Please feel free to update this bullet list with anything that we may have missed. Thank you both again for taking the time to speak with us!

Sincerely,



**HEATHER LEVEN**

***Environmental Project Manager***

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