

Leking, Geoffrey R, EMNRD

From: Kristin Pope <kristin@rthicksconsult.com>
Sent: Tuesday, February 19, 2013 10:30 AM
To: Leking, Geoffrey R, EMNRD
Cc: Randy Hicks; Chace Walls; Greg Boans
Subject: RE: INITIAL C-141: Murchison Jackson Unit #8 release
Attachments: initial C-141 Jackson Unit 8.pdf

HOBBS OCD

FEB 19 2013

RECEIVED

Mr. Leking:

Your patience regarding the remediation of this release has been appreciated. As you will recall, the saturated soil from this release area was promptly removed to a permitted disposal facility. Lab analysis of the soil left in place did not result in meeting our target values for hydrocarbons (Benzene, BTEX; did not analyze for TPH, GRO/DRO at that time).

| Target Values: Small Landfarm Closure Standards (mg/kg) | | 1/21/2013 surface comp. |
|--|------|----------------------------|
| Chloride | 500 | 480 |
| Benzene | 0.2 | ND (<0.500) |
| BTEX | 50 | 127 |
| TPH | 2500 | not analyzed |
| GRO/DRO | 500 | not analyzed |

Because the initial concentrations were only slightly higher than our target values, we concluded that the risk to public health and the environment was minimal. Therefore, we instructed Murchison to disc harrow the site in an effort to facilitate in-place remediation of residual hydrocarbons and to prepare the soil for seeding. I will collect another sample for lab analysis this week so that we can track our progress. We respectfully request additional time to receive the lab results of this sampling event before making a determination of the potential of remaining constituents to endanger public health or the environment.

Thank you for your understanding.

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

From: Kristin Pope [<mailto:kristin@rthicksconsult.com>]
Sent: Friday, February 01, 2013 11:47 AM
To: GeoffreyR.Leking@state.nm.us
Cc: Greg Boans; Chace Walls; Randy Hicks
Subject: INITIAL C-141: Murchison Jackson Unit #8 release

Mr. Leking:

You will receive a signed copy of this form in mail from Murchison. We just received laboratory results yesterday from our sampling of this site and we are evaluating them. Before February 15, we will submit our evaluation of the release and provide an opinion regarding the potential for this release to "endanger public

health or the environment". If the data and our analysis demonstrate to the satisfaction of OCD that no such threat exists, a remediation plan would not be required under 19.15.29.11 (see below). Prior to asking for a remediation plan, we respectfully request that OCD make that determination after we review laboratory results and analysis.

19.15.29.11 CORRECTIVE ACTION: The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC.

Thank you for your understanding.

Regards,

Kristin Pope
R.T. Hicks Consultants
Carlsbad Field Office
575.302.6755

April 30, 2013

KRISTIN POPE

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

HOBBS OCD

JUN 10 2013

RECEIVED

RE: JACKSON UNIT #8 RELEASE

Enclosed are the results of analyses for samples received by the laboratory on 04/24/13 10:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-11-3. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

| | |
|------------------|------------------------------|
| Method EPA 552.2 | Haloacetic Acids (HAA-5) |
| Method EPA 524.2 | Total Trihalomethanes (TTHM) |
| Method EPA 524.4 | Regulated VOCs (V1, V2, V3) |

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

R T HICKS CONSULTANTS
KRISTIN POPE
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received: 04/24/2013
Reported: 04/30/2013
Project Name: JACKSON UNIT #8 RELEASE
Project Number: NONE GIVEN
Project Location: NOT GIVEN

Sampling Date: 04/23/2013
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Jodi Henson

Sample ID: 5 PT COMP @ 18" BGS (H300964-01)

| BTX 8021B | | | mg/kg | | Analyzed By: AP | | | | |
|----------------|--------|-----------------|------------|--------------|-----------------|------------|---------------|--------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Benzene* | <0.050 | 0.050 | 04/29/2013 | ND | 2.18 | 109 | 2.00 | 0.709 | |
| Toluene* | <0.050 | 0.050 | 04/29/2013 | ND | 1.96 | 98.2 | 2.00 | 0.399 | |
| Ethylbenzene* | <0.050 | 0.050 | 04/29/2013 | ND | 2.14 | 107 | 2.00 | 0.0330 | |
| Total Xylenes* | <0.150 | 0.150 | 04/29/2013 | ND | 6.18 | 103 | 6.00 | 1.28 | |
| Total BTX | <0.300 | 0.300 | 04/29/2013 | ND | | | | | |

Surrogate: 4-Bromofluorobenzene (PIE) 104 % 89.4-126

| Chloride, SM4500Cl-B | | | mg/kg | | Analyzed By: AP | | | | |
|----------------------|--------|-----------------|------------|--------------|-----------------|------------|---------------|------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| Chloride | <16.0 | 16.0 | 04/26/2013 | ND | 432 | 108 | 400 | 3.77 | |

| TPH 8015M | | | mg/kg | | Analyzed By: MS | | | | |
|--------------|--------|-----------------|------------|--------------|-----------------|------------|---------------|--------|-----------|
| Analyte | Result | Reporting Limit | Analyzed | Method Blank | BS | % Recovery | True Value QC | RPD | Qualifier |
| GRO C6-C10 | <10.0 | 10.0 | 04/26/2013 | ND | 221 | 110 | 200 | 0.0421 | |
| DRO >C10-C28 | 53.4 | 10.0 | 04/26/2013 | ND | 215 | 107 | 200 | 0.553 | |

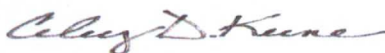
Surrogate: 1-Chlorooctane 108 % 65.2-140

Surrogate: 1-Chlorooctadecane 128 % 63.6-154

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

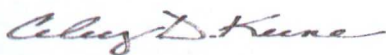
Notes and Definitions

| | |
|-----|--|
| ND | Analyte NOT DETECTED at or above the reporting limit |
| RPD | Relative Percent Difference |
| ** | Samples not received at proper temperature of 6°C or below. |
| *** | Insufficient time to reach temperature. |
| - | Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report |

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---------------------------------|--|----------------------------|--|--------------|--|---|--|--|--|----------|--|--------------------|--|----------|--|----------|--|----------|--|--|--|--|--|--|--|--|--|--|--|--|--|
| Company Name: <u>R.T. Hicks Consultants</u> | | | | BILL TO | | | | ANALYSIS REQUEST | | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Manager: <u>Kristin Pope</u> | | | | P.O. #: | | | | <div style="display: flex; flex-direction: column; align-items: center; justify-content: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">CI-</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TPH (PRO/GRO)</div> </div> | | | | | | | | | | | | | | | | | | | | | | | | | |
| Address: | | | | Company: <u>R.T. Hicks</u> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| City: | | State: | | Zip: | | Attn: | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Phone #: | | Fax #: | | Address: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Project #: | | Project Owner: <u>Murchison</u> | | City: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Project Name: <u>Jackson Unit #8 Release</u> | | | | State: | | | | | | | | | | | | | | | | Zip: | | | | | | | | | | | | | |
| Project Location: | | | | Phone #: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sampler Name: <u>K. Pope</u> | | | | Fax #: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FOR LAB USE ONLY | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lab I.D. | | Sample I.D. | | (C)RAB OR (C)OMP. | | # CONTAINERS | | MATRIX | | | | PRESERV. | | SAMPLING | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | GROUNDWATER | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | WASTEWATER | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | SOIL | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | OIL | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | SLUDGE | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | OTHER: | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | ACID/BASE: | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | ICE / COOL | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | OTHER: | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | DATE | | TIME | | | | | | | | | | | | | | | | | | | |
| <u>H300964</u> | | <u>15-pt comp. @ 18" BGS</u> | | <u>C2</u> | | <u>2</u> | | <u>X</u> | | | | <u>X</u> | | <u>042313 1033</u> | | <u>X</u> | | <u>X</u> | | <u>X</u> | | | | | | | | | | | | | |

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| | | | | | | | | | |
|--------------------------------------|--|---|--|--------------------------------|--|--|--|----------------|--|
| Relinquished By: <u>Kristin Pope</u> | | Date: <u>0424/13</u> | | Received By: <u>Debra Pope</u> | | Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | | Add'l Phone #: | |
| Time: <u>6:00</u> | | Time: <u>6:00</u> | | Time: <u>6:00</u> | | Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No | | Add'l Fax #: | |
| Relinquished By: <u>Kristin Pope</u> | | Date: <u>4/24/13</u> | | Received By: <u>Debra Pope</u> | | REMARKS: | | | |
| Time: <u>10:30</u> | | Time: <u>10:30</u> | | Time: <u>10:30</u> | | | | | |
| Delivered By: (Circle One) | | Sample Condition | | CHECKED BY: | | | | | |
| Sampler - UPS - Bus - Other: | | Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/> | | (Initials) | | | | | |
| | | Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> | | | | | | | |