

## Bratcher, Mike, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Thursday, September 12, 2013 1:22 PM  
**To:** 'Cindy Crain'  
**Cc:** Phelps White  
**Subject:** RE: Primero Operating Company, Inc., Milano #1 Tank Battery (2RP-1867) Remediation Plan

Cindy,

Sorry for not getting back with you. You are on my call-back list, and if we need to discuss respond back via email and I will call you later today. I will be in the field for a little bit this afternoon.

Your proposal for remediation at this site is approved. At this time, OCD would prefer to see a more complete delineation in the SP-2 area, but if it is not practicable to do, we will go with this proposal.

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.

If you have any questions or concerns, please contact me.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

**From:** Cindy Crain [<mailto:cindy.crain@gmail.com>]  
**Sent:** Wednesday, September 11, 2013 2:44 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Phelps White  
**Subject:** Primero Operating Company, Inc., Milano #1 Tank Battery (2RP-1867) Remediation Plan

Mike,

I received laboratory results from the soil samples at the Primero Operating, Milano #1 tank battery located in Unit Letter H, Sec. 36, T24S, R28E, Eddy County, New Mexico.

As we have previously discussed, depth to groundwater appears to be greater than 100 feet below ground surface (bgs).

On August 27, 2013, soil samples were collected at two (2) areas within the tank battery. SP-1 samples were collected from the west end of the tank battery in the most heavily impacted area, at surface and every foot thereafter to a depth of ten (10) feet bgs. Sample SP-2 was collected from the east end of the tank battery at the surface only.

All SP-1 and SP-2 samples were analyzed for chlorides, with SP-2 samples from surface, 1 foot, and 2 foot also being analyzed for TPH and BTEX. Table 1 is attached that shows the laboratory results.

Referring to Table 1, TPH and BTEX were non-detect at a depth of two (2) feet bgs at the SP-2 sample location. Chloride concentrations decreased from 9200 mg/kg at the surface to less than 1,000 mg/kg (842 mg/kg) at a depth of four (4) feet bgs. The chloride concentration at the SP-2 location fluctuated with depth (in sandy soil), resulting in a concentration of 2950 mg/kg at a depth of ten (10) feet where caliche was initially encountered. The chloride concentration from the east end of the battery (SP-2) was reported at 784 mg/kg at the surface.

Primero Operating proposes to excavate soil from the west end of the tank battery (surrounding the SP-1 location) to a depth of four (4) feet bgs, removing all hydrocarbon impacted soil and the most heavily chloride impacted soil. Hydrocarbon impacted soil will also be removed from the remainder of the tank battery, to a depth of two (2) feet bgs, or as necessary. Impacted soil will be disposed at an NMOCD approved facility, and the tank battery will be backfilled with clean soil.

I do have a crew reserved to complete the remediation the first of next week (Sept. 16 and 17), if this remediation plan is acceptable to you. Please let me know at your earliest convenience.

Sincerely,  
Cindy Crain

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*Crain Environmental*  
*(575) 441-7244*

## Bratcher, Mike, EMNRD

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**From:** Cindy Crain <cindy.crain@gmail.com>  
**Sent:** Wednesday, September 11, 2013 2:44 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Phelps White  
**Subject:** Primero Operating Company, Inc., Milano #1 Tank Battery (2RP-1867) Remediation Plan  
**Attachments:** Milano #1 Table.xls

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Cindy Crain

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*Crain Environmental*  
*(575) 441-7244*

## **Bratcher, Mike, EMNRD**

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**From:** Microsoft Outlook  
**To:** Cindy Crain; Phelps White  
**Sent:** Thursday, September 12, 2013 1:23 PM  
**Subject:** Relayed: RE: Primero Operating Company, Inc., Milano #1 Tank Battery (2RP-1867) Remediation Plan

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Cindy Crain \(cindy.crain@gmail.com\)](mailto:cindy.crain@gmail.com)

[Phelps White \(pwiv@zianet.com\)](mailto:pwiv@zianet.com)

Subject: RE: Primero Operating Company, Inc., Milano #1 Tank Battery (2RP-1867) Remediation Plan

**Table 1: Summary of Laboratory Analysis of Soil Samples  
 Primero Operating Company, Inc., Milano #1  
 UL-H, Sec. 36, T24S, R28E,  
 Eddy County, New Mexico**

Sample Date	Soil Sample Number	Sample Depth (feet bgs)	TPH (GRO) C6-C10	TPH (DRO) >C10-C28 (mg/kg)	Total TPH (mg/kg)	Benzene (mg/kg)	Total BTEX (mg/kg)	Chlorides (mg/kg)
8/27/13	SP-1	0-6"	369	23,300	23,669	<0.050	0.483	9200
		1	<100	3,490	3,490	<0.050	<0.300	4320
		2	<10.0	<10.0	<20.0	<0.050	<0.300	4720
		3	---	---	---	---	---	2840
		4	---	---	---	---	---	842
		5	---	---	---	---	---	786
		6	---	---	---	---	---	3380
		7	---	---	---	---	---	1110
		8	---	---	---	---	---	750
		9	---	---	---	---	---	1340
		10	---	---	---	---	---	2950
8/27/13	SP-2	0-6"	---	---	---	---	---	784

Notes: *Samples SP-1 - 0-6" through 3' and SP-2 Analyzed by Cardinal Laboratories, Hobbs, New Mexico.  
 Samples 4' through 10' Analyzed by Xenco Laboratories, Odessa, Texas.*

- 1. BGS: Depth in feet below ground surface
- 2. mg/kg: Milligrams per kilogram
- 3. ND: Non-Detectable