1R - 306

APPROVALS

YEAR(S):

2001

Price, Wayne

From: Price, Wayne
Sent: Monday, April 02, 2001 8:41 AM
To: Price, Wayne; 'Gilbert J. Van Deventer'
Cc: Fergerson, John; Weathers, Steve; Van Deventer, Gil J.; Williams, Chris
Subject: RE: Backfill request

Your request to backfill for safety reasons is hereby approved with the following conditions:

1. A final report shall be submitted to the Santa Fe Office with a copy to the District office by June 15, 2001. The OCD has assigned this project with a case # 1R0306. Please provide this number on all future documents.

2. Duke Energy will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

Please be advised that NMOCD approval of this plan does not relieve Duke Energy of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Duke Energy of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Gilbert J. Van Deventer[SMTP:Gilbert.Vandeventer@trw.com]
Sent: Friday, March 30, 2001 2:52 PM
To: Price, Wayne
Cc: Fergerson, John; Weathers, Steve; Van Deventer, Gil J.
Subject: Backfill request

<<File: JC.doc>>
Wayne:

Per our earlier conversation today, and per the request of Steve Weathers (Environmental Project Manager for Duke Energy Field Services), we request permission to backfill an area of excavation due to safety concerns (suspended natural gas liquid pieline with support lacking) with the understanding that we may have to conduct further investigation and/or excavation in the future. Below is a list of the most recent analytical results for the current excavation:

Sample ID (location)	GRO	DRO	OVM
Y (South Floor 20')	47	584	121
Z (North Floor 20')	<10	133	28
aa (North Wall)	<10	<10	0.1
bb (Northeast Wall)	<10	<10	0.4
cc (South Wall)	<10	<10	0.1
dd (Southeast Wall)	992	5227	177

All samples are 5-point composites

The current size of the excavation as follows:
aa-North Wall (~29 ft wide)
bb-South Wall (~29 ft wide)
bb&dd-East Wall (~43 ft long)
West wall has been completely excavated to previously excavated area so it is essentially clean to non-detect levels (<10 mg/kg)
Depth of current excavation aprox. 20 ft below surface.

Price, Wayne

[redacted]

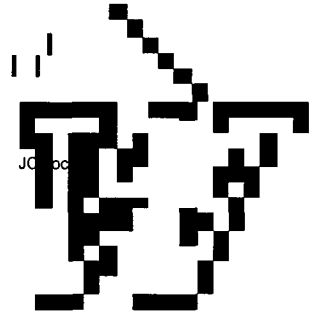
From: Gilbert J. Van Deventer[SMTP:Gilbert.Vandeventer@trw.com]

Sent: Friday, March 30, 2001 2:52 PM

To: Price, Wayne

Cc: Fergerson, John; Weathers, Steve; Van Deventer, Gil J.

Subject: Backfill request



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Site Name: Jimmy Cooper #3
Site Location: Unit E, Section 30, T20S, R37E
Depth to groundwater <50 ft (estimated based on nearest recordewd water well)

Attached is the revised work plan previously submitted to Donna Williams describing our procedures. Per your request I will be able to send photos in JPEG format on Monday. We plan on mobilizing the current equipment to another cleanup location (on property owned by Jimmy Cooper) after backfilling the current location. Will return with equipment at a later date if required.

Please advise.

Gilbert J. Van Deventer, REM
TRW Inc. - Environmental Services Unit
415 West Wall Street, Suite 1818
Midland, Texas 79701
(915) 682-0008 - Office
(915) 682-0028 - Fax
(915 557-5614 - Cellular

March 19, 2001

Ms. Donna Williams
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

Re: Revised Work Plan for Removal of Hydrocarbon-Impacted Soils along Pipeline right-of-way operated by Duke Energy Field Services near Monument, New Mexico

Dear Ms. Williams:

TRW Inc. – Energy & Environmental Integration Services (TRW) was retained by Duke Energy Field Services Inc. (DEFS) to prepare this work plan for the removal of hydrocarbon-impacted soil along pipeline right-of-way operated by DEFS near Monument, New Mexico in Lea County. The purpose of this work plan is to develop procedures that meet the requirements of the landowner (New Mexico State Land Office (SLO)), New Mexico Oil Conservation Division (OCD), and DEFS. The legal description of the site location is as follows: 32° 33' 5" N (latitude), 103° 17' 39" W (longitude), township[20 South, range 36 east, section 30, unit K. Initially it was the understanding of DEFS that the subject property was owned or leased by Mr. Jimmy T. Cooper. However, it was later determined after initiation of remedial activities that the property is actually owned by the SLO and the surface is leased to EOTT.

Allstate Services Environmental (Allstate) will perform the soil excavation and transport the soil to the C & C Landfarm owned and operated by Mr. Cooper. Allstate will be responsible for contacting the New Mexico One Call for all line location requests. TRW personnel will also periodically collect soil samples to characterize the extent of hydrocarbon-impact and advise DEFS when cleanup target levels have been achieved where practicable.

Soil Sampling Procedures

During excavation operations, subsurface soil samples will be collected and submitted to an OCD-approved analytical laboratory to characterize the approximate lateral and vertical extent of hydrocarbon-impacted soil at each site. Samples will be collected by TRW with stainless steel trowels and/or hand augers. During the course of excavation activities, samples will also be collected for headspace analysis using an organic vapor meter (OVM) which will be calibrated to assume a benzene response factor. The headspace analysis will be used as guidance for continuation or cessation of excavation activities. All soil sampling, headspace analysis, and laboratory analysis will be performed in accordance with OCD *"Guidelines for Remediation of Leaks, Spills, and Releases"* (August 13, 1993). Excavation operations will cease when laboratory analysis of collected samples indicates the extent of hydrocarbon-impacted soils remaining in the excavation is below the following concentrations:

- 100 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH),
- 10 mg/kg benzene,
- 50 mg/kg total benzene, toluene, ethylbenzene, and xylenes (BTEX)

Upon completion of excavation activities, closure samples will be collected as follows:

- One composite sample consisting of a minimum of three aliquots will be collected along each wall (north, south, east and west sides) approximately every 50 linear feet of the excavation.
- One composite sample consisting of five aliquots will be collected from the floor of the excavation approximately every 50 linear feet.

Soil samples submitted to the laboratory shall be analyzed for gas and diesel range organics (GRO and DRO) using EPA Method 8015 to determine TPH concentrations. Samples will also be analyzed for BTEX using EPA Method 8021B.

Soil Stockpiling and Backfilling

An effort to segregate clean versus impacted soil during excavation will be made. Only hydrocarbon-impacted soil that exceeds 100 mg/kg TPH, 10 mg/kg benzene, and/or 50 mg/kg total BTEX will be transported to the C & C Landfarm. These target cleanup levels are based on the ranking criteria in the OCD *"Guidelines for Remediation of Leaks, Spills, and Releases"*. A total ranking score of greater than 19 points is assumed since groundwater is reportedly less than 50 feet below ground surface. Any excavated soils below the remediation action levels may be returned to the excavation after sampling and analysis verification. Mr. Jimmy T. Cooper will provide nonhydrocarbon-impacted native soil and it will be used as additional backfill in the excavation until the original grade of the excavated site is restored as practicable.

Recordkeeping and Waste Disposition

A field logbook and photographs will also be used to record work related activities. Site data forms that will document pertinent information (Attachment A) will be completed for each site. The site data forms will include:

- Date and time of arrival/departure
- Site location (latitude and longitude)
- Site map (excavated area, sample locations, and pertinent structures)
- OVM readings (breathing zone and sample screening)
- Depth and areal extent of excavation (explanation and site sketch)
- Volume of excavated soil in cubic yards
- Comments (weather, visitors, crew names)

Hydrocarbon-impacted soils will be transported by Allstate to the C & C Landfarm. A Request for Approval to Accept Solid Waste form (C-138), a Generator Certificate of Waste Status form (C-143), and laboratory analytical reports will accompany the excavated soil as required by the landfarm permit.

A letter report will be prepared by TRW describing the excavation procedures, sample methods, analytical results, and supporting documentation (site data forms, C-138 and C-143 forms, laboratory analytical reports, and photodocumentation). The letter report will be submitted to the District OCD office along with a request from DEFS for no further action.

If you find the procedures proposed in this work plan acceptable please acknowledge your approval verbally followed with written backup at your convenience. Work is scheduled to begin February 19, 2001. DEFS and TRW look forward to working with SLO and OCD in getting closure to the affected sites. Please feel free to contact Mr. Steve Weathers (DEFS) at (303) 605-1718 or myself at (915) 682-0008 if you have any questions.

Sincerely,

Gilbert J. Van Deventer, REM
Project Manager

Attachments

xc: Myra Meyers, New Mexico State Land Office – Hobbs, NM
Steve Weathers, DEFS - Denver, CO

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