

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, June 11, 2014 9:47 AM
To: 'Brian Weaver'
Cc: Daniel Frick (DFrick@linnenergy.com); Scott Drewry
Subject: RE: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

Brian,

Your re-cap of our phone conversation is accurate. In addition, I had also mentioned that remediation on Federal sites will require BLM approval in addition to OCD approval.

Thank you,

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: Brian Weaver [mailto:brian.weaver@skaconsulting.com]
Sent: Tuesday, June 10, 2014 4:47 PM
To: Bratcher, Mike, EMNRD
Cc: Daniel Frick (DFrick@linnenergy.com); Scott Drewry
Subject: RE: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

Mike,

Thanks for talking with me on the phone earlier this afternoon.

Just wanted to re-cap our discussion, as it pertains to the one bottom confirmation soil sample from AOC-2 at the above-referenced property.

As we discussed, SKA is completing our soil response actions at the site per our approved Abatement Plan. We are completing the last excavation area (AOC-2). This excavation area is wholly contained within a caliche roadway that travels along the western side of the tank battery. The excavation is approx 15 feet wide and 145 feet long. The proposed depth of this excavation is 2 feet deep. During excavation, we discovered numerous buried poly lines bisecting (perpendicular) the northernmost 30-feet of the excavation. The poly lines were buried at a depth of 1-foot or slightly deeper. Once encountered, we stopped machine excavating and moved to hand-excavating with shovels. Although we did not reach our target depth of 2 feet due to all the lines within a small area, we collected a bottom confirmation soil sample as best we could from this area (1-foot deep). The testing results later reported a chloride concentration of 1,960 mg/Kg, which is above our Chloride regulatory standard for this site of 1,000 mg/Kg. Therefore, the following day we over-excavated by hand the bottom of the northern extent of the excavation as best we could, where all the buried flow lines were located. An over-excavated soil sample was collected from about 1-foot deep. We just received the sample result - was reported at 2,120 mg/Kg, which is still above our regulatory standard. The other sidewall and bottom confirmation soil samples for this immediate area of AOC-2 all passed with very low chloride concentrations (non-detect to less than 100 mg/Kg).

Although we have a bottom confirmation soil sample that has reported a chloride concentration of 2,120 mg/Kg, which is above the regulatory standard for this site of 1,000 mg/Kg, we conclude no further soil removal activities can be achieved due to the numerous poly flow lines buried at 1-foot deep on the northernmost extent of the excavation area of AOC-2. We have removed all soil as deep as practicable from this area (via machine [once] and hand [twice]).

Based on this description provided to you via a phone conversation today, you agreed and approved that no further vertical delineation or soil excavations are warranted in this area of AOC-2. In addition, you recommended that NO poly liner be placed at the bottom of the excavation. You recommended that the excavation was deemed complete and document thoroughly in the final report.

If this summary differs from your understanding of our phone conversation, please feel free to call or email.

Thanks again for your feedback and assistance.

Kindest regards,

BRIAN T. WEAVER, P.G.
SKA Consulting, L.P.

Ph: 713.266.6056
Fax: 713.266.0996
Direct: 832.255.5550
Mob: 713.907.3485

From: Brian Weaver
Sent: Thursday, May 22, 2014 10:29 AM
To: mike.bratcher@state.nm.us
Subject: RE: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

Mike,

Quick update:

The on-site soil remediation for this project will begin next week – Wednesday, May 28.
SKA personnel (Mr. Scott Drewry) will be on-site for all work, sampling, etc.
Once complete, we will prepare a written report and submit to you for review/approval.

If you have any questions, please feel free to call or email me.

Kindest regards,

BRIAN T. WEAVER, P.G.
SKA Consulting, L.P.

Ph: 713.266.6056
Fax: 713.266.0996
Direct: 832.255.5550
Mob: 713.907.3485

From: Brian Weaver
Sent: Tuesday, April 29, 2014 12:33 PM
To: mike.bratcher@state.nm.us
Cc: Daniel Frick (DFrick@linnenergy.com)
Subject: RE: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

Mike,

I wanted to thank you again for your time this morning, as it pertains to our discussion about the revised Abatement Plan for the above-referenced Site. Specifically, limiting the excavation of AOC-1 to only 4 feet below ground surface (ft-bgs) due to the chloride impacts (as referenced in the email below).

To summarize our discussion, we will now limit the excavation in AOC-1 to only 4 ft-bgs and then install a 20-mil poly liner in the bottom of the excavation. Confirmation sidewall soil samples will be collected in order to confirm horizontal delineation of chloride impacts; however, no bottom confirmation soil samples will be collected or analyzed.

Thanks again.

BRIAN T. WEAVER, P.G.
[SKA Consulting, L.P.](#)

Ph: 713.266.6056
Fax: 713.266.0996
Direct: 832.255.5550
Mob: 713.907.3485

From: Brian Weaver
Sent: Thursday, April 03, 2014 10:41 AM
To: mike.bratcher@state.nm.us
Subject: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

RE: SITE INVESTIGATION REPORT AND ABATEMENT PLAN
TURNER B SOUTH TANK BATTERY
SECTION 29, TOWNSHIP 17 SOUTH, RANGE 31 EAST
LOCO HILLS, EDDY COUNTY, NEW MEXICO

Mike,

I just left you a v-mail at your office...but wanted to follow-up with an email.

I was talking with Daniel Frick (LINN Energy) this morning, and he stated that based on the meeting you attended with him and other LINN personnel about this site in late January, the Abatement Plan, as we (SKA) prepared for LINN was slightly modified. That is, our January 28, 2014 Site Investigation Report and Abatement Plan that you approved in that meeting was changed to reflect the ultimate depth of the excavations will now not exceed a total depth of 4 feet below ground surface. Our Abatement Plan specifically addresses three (3) Areas of Concern. Of which, one of these areas (AOC-1) was initially proposed to be excavated to a total depth ranging from 6 to 8 feet below ground based on elevated chloride concentrations above the 1,000 mg/Kg regulatory level agree-upon in the Report. However, as Daniel indicates from your meeting with him in January, that total depth is now limited to just 4 feet below grade – based on what was described in the meeting as diminishing returns and unwarranted based on the area (as documented in the report).

Question is this: LINN and SKA want to ensure you have approved the excavations to not exceed a total depth of 4 feet below grade; although, current chloride concentrations in soil at approx. 6 to 8 feet within AOC-1 exceed the 1,000 mg/Kg regulatory standard for this site; and future confirmation soil samples ultimately to be collected from the open excavations (sidewalls and bottoms) may also exceed this 1,000 mg/Kg regulatory standard for this site. Is this accurate, as you recall from the January meeting? Please advise. Again, LINN understands the excavations will now not exceed 4 feet.

LINN is wanting to proceed with the soil excavations at the site very soon and resolve this outstanding issue. Please feel free to call or email me, at your very earliest convenience.

Thanks,

BRIAN T. WEAVER, P.G.

Vice President & Partner



SKA CONSULTING, L.P.

Consulting Engineers, Scientists, and Geologists

1515 Witte Road, Suite 150

Houston, Texas 77080

Ph: 713.266.6056

Fax: 713.266.0996

Direct: 832.255.5550

Mob: 713.907.3485

www.skaconsulting.com

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-- Thank You
