

## Bratcher, Mike, EMNRD

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**From:** Brian Weaver <brian.weaver@skaconsulting.com>  
**Sent:** Wednesday, June 11, 2014 3:35 PM  
**To:** tgregsto@blm.gov  
**Cc:** Daniel Frick (DFrick@linnenergy.com); Scott Drewry; Bratcher, Mike, EMNRD; Stein, Chris M (cstein@blm.gov)  
**Subject:** RE: Loco Hills, NM - Turner B South Tank Battery (LINN Energy)

Terry,

It was a pleasure speaking with you this afternoon by phone.

Thank you for taking the time to discuss the bottom confirmation soil sample from AOC-2 at the above-referenced site, per my email summary as initially provided to Mr. Mike Bratcher with OCD. This email is to summarize our recent discussion.

As noted in my initial email to OCD (as provided below), I provided to you a summary of the events relative to the northernmost extent of AOC-2 and the flow lines that impeded further (ie, deeper) excavation to the target depth of 2 feet below ground surface within this one small area. Based on our numerous attempts by machine and hand-excavating, the bottom confirmation soil sample (~ 1-foot deep) still reported a chloride concentration above the OCD regulatory standard for the site of 1,000 mg/Kg. However, based my discussion with Mr. Bratcher w/OCD on June 10, 2014, leaving this soil in-place was acceptable to OCD (as provided below). Based on this account, you provided your concurrence and approval for leaving this chloride-impacted soil within this area of AOC-2 in-place. Therefore, you also recommended no further excavations were warranted.

If this summary differs from your understanding of our phone conversation, please feel free to call or email. Thank you for all your assistance with this project.

Kindest regards,

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

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**From:** Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]  
**Sent:** Wednesday, June 11, 2014 10:47 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  
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**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](mailto: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.](#)

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