

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, January 07, 2016 6:53 AM
To: 'Everhart, Harley'
Cc: Busch, Greg; Prentiss, John
Subject: RE: Abo 16" Inlet_1.6.2016

Harley,

I believe the site ranking for this area will be zero. There is some data that suggests ground water may less than 100', but a study done for construction of a recycle pit indicated water is likely deeper. Even with a site ranking of zero, sample point 10 is over twice the RRAL for TPH, with all of it being DRO. OCD would prefer soil removal to eliminate impacted materials that are over the RRAL, but if it is not practicable, OCD will approve your proposal for a liner. The liner needs to be set under the pipeline, at a minimum of 3' (prefer 4') bgs and a 20 mil liner needs to be used.

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

Thanks,

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: Everhart, Harley [mailto:heverhart@akaenergy.com]
Sent: Wednesday, January 06, 2016 2:35 PM
To: Bratcher, Mike, EMNRD
Cc: Busch, Greg; Prentiss, John
Subject: RE: Abo 16" Inlet_1.6.2016

Hello Mike,

All samples were taken ~3ft deep, the excavation is ~3ft deep, and the pipeline is running E/W. The liner will be on bottom (3ft) and going under the pipe, a photo will be taken before backfilling with clean soil. This pipeline is not very deep due to the hard caliche; in addition, the contractor decided to slope the edges to prevent injury to livestock.

On a slightly different note, I don't believe an initial RP# was assigned, would you please email this to me when you get the opportunity?

If you have any additional questions, please do not hesitate to contact me.

Respectfully,

Harley Everhart

From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]
Sent: Wednesday, January 06, 2016 12:57 PM
To: Everhart, Harley <heverhart@akaenergy.com>
Cc: Busch, Greg <gbusch@akaenergy.com>; Prentiss, John <jprentiss@akaenergy.com>
Subject: RE: Abo 16" Inlet_1.4.2016

Harley,

Couple of questions. What depth were your samples obtained? What depth was the excavation? In the sample point photo, is the pipeline running N/S or E/W? At what depth are you proposing to place the liner and will it be over the pipeline?

Thanks,

Mike Bratcher
NMOCD District 2
811 S. First Street
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From: Everhart, Harley [<mailto:heverhart@akaenergy.com>]
Sent: Monday, January 04, 2016 10:09 AM
To: Bratcher, Mike, EMNRD
Cc: Busch, Greg; Prentiss, John
Subject: Abo 16" Inlet_1.4.2016

Hello Mike,

Please look at the following attached data in pdf format which includes,

- 1) 12 Sample Location
- 2) Cardinal Lab Results
- 3) Documented Water Column/Average Depth to Water from the New Mexico Office of the State Engineer, including a radius area from the remediation site of 5000 meters which is equivalent to 16404.2 feet or 3.1 miles.
- 4) A DeLorme Ariel map with Section, Township, and Range, along with the distance of the four closes water wells with respect to the Abo 16" Inlet Remediation site.

Final Work Plan:

The cause and conditions of the leak was identified and alleviated by replacing a section of the 16" line. Excavation for, TPH, BTEX, and Benzene are below the levels outlined in "NMOCD Guidelines for Remediation of Leaks, Spills, and Releases" with the exception of samples 5(6660),7(4200),9(2360) & 10(10800) . The geological formation of these four sample areas is a very hard caliche and further remediation beyond existing depth is infeasible. Frontier would like to request that a ten-mil liner be placed along the entire remediation area and backfilled with clean soil, followed by a final report to you with supporting documentation upon completion. All impacted soils was transported to an OCD approved facility for disposal.

Respectfully,

Harley Everhart

EH&S Compliance

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(575) 513-4922 - Cell

(575) 676-2401 - Fax

heverhart@akaenergy.com



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