

Rose-Coss, Dylan H, EMNRD

From: Rose-Coss, Dylan H, EMNRD
Sent: Friday, June 14, 2019 2:14 PM
To: 'Joel Lowry'
Subject: RE: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Mr. Lowry,

Thanks for the email and clarification. Upon further review the OCD is ready to except the remediation plan with a few requests:

1. That the area of excavation around V3 be expanded to include the area around V4 1' and EH-1.
2. That the depth of excavation in this aforementioned area be 1 ft instead of 8 inches.
3. That an additional sample be collected in between sample V2 6" and EH-1.

Thanks, and let me know if you have any questions or concerns regarding these requests.

Regards,

Dylan Rose-Coss

Environmental Scientist
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

(505) 476-3488

From: Joel Lowry <joel@lowryenvironmental.com>
Sent: Thursday, June 13, 2019 4:57 PM
To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>
Subject: [EXT] RE: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Dylan,

I have received your email. Thanks for the timely response. I see how there could be some confusion. It should read as follows:

4 ft bgs in the area of sample point V1 and V-1b, or until laboratory analytical results indicate BTEX, TPH and chloride concentrations are below NMOCD Closure Criteria/NMOCD Reclamation Standards
6 in. bgs in the area of sample point V2, or until laboratory analytical results indicate BTEX, TPH and chloride concentrations are below NMOCD Closure Criteria/NMOCD Reclamation Standards
8 in. bgs in the area of V3, or until laboratory analytical results indicate BTEX, TPH and chloride concentrations are below NMOCD Closure Criteria/NMOCD Reclamation Standards

I generally State the inferred depth and add the statement "or until analytical results indicated concentrations of BTEX, TPH and chloride concentrations are below NMOCD Closure Criteria/NMOCD Reclamation Standard". I like to put this statement so that the regulatory agency knows I will be advancing the excavation as deep as necessary to ensure impacted soil affected above the NMOCD Closure Criteria/Reclamation Standard (<4' bgs) is removed, and so that they

know I will be collecting excavation confirmation soil samples. It is kind of weird. Its just a way to include some inferences from the delineation data and propose remediation activities.

As for the horizontal excavation, it is similar. I almost always put "excavation sidewalls will be advanced horizontally until laboratory analytical results from confirmation soil samples indicated BTEX, TPH and chloride concentrations are below the NMOCD Closure Criteria/NMOCD Reclamation Standard". So I won't be spot digging each of the sample locations, rather starting an excavation at the stated target depth and advancing it horizontally and vertically until confirmation soil samples indicate soil affected above the NMOCD Closure Criteria/Reclamation Standard has been removed.

Part of me believes every workplan should be as simple as "The floor and sidewalls of the excavation will be advanced until analytical results indicate impacted soil affected above the NMOCD Closure Criteria has been removed....." or "Impacted soil affected above the NMOCD Closure Criteria will be excavated and....."

I am glad you sent this email because I noticed that I didn't properly address impacts present in sample point V4 1'. This was another project that an alternative contractor collected the four (4) 11/2/18 samples and I went back to try to collect additional samples to meet the State's requirement. Similarly, based on the age of the project, I am not sure operators/NMOCD agents were going after soil affected above the NMOCD Reclamation Standards, but less than the NMOCD Closure Criteria.

With this, your approval, if you chose may State:

"Approved with the condition that affected soil impacted above the NMOCD Reclamation Standard (100 mg/kg TPH, 600 mg/kg Chloride) present within the uppermost 4 ft. be excavated and transported to and NMOCD permitted disposal facility." This site is on Private land so there is not other surface agency to deal with.

If you have any questions or need anything else, please feel free to contact me by phone or email.

Respectfully,

Joel Lowry

Environmental Professional

LOWRY
environmental



PO Box 896
Lovington, NM 88260
Direct 432-466-4450

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From: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>
Sent: Thursday, June 13, 2019 4:24 PM
To: Joel Lowry <joel@lowryenvironmental.com>
Subject: RE: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Joel,

After review of the remediation plan for the above referenced site I have a few small questions regarding bullet point 2 of the plan. The bullet point reads,

“The floor of the excavation will be advanced to a depth of approximately 4 ft. bgs in the area characterized by sample points V1 and V-1b, 6 in. bgs in the area characterized by sample point V2, 8 in. bgs in the area characterized by sample point V3 or until laboratory analytical results from confirmation soil samples indicate concentrations of BTEX, TPH and chloride are below the NMOCD Closure Criteria.”

Is the line “V-1b, 6 in. bgs” referring to the sample in the table with the ID of V-1b @ 4'-R? Or is this to read that the area around the V-1b sample is going to be excavated to 6 inches?

I have a similar question regarding the sample point “V2, 8 in. bgs”. In the associated table and on the Map “V2” is a 6 inch sample.

Additionally is the proposal to excavate all the material in-between these areas, or the material in the immediate are of these samples. If it is just in the immediate area, then how far from the initial sample will the excavation proceed?

Thanks, and let me know if I am making any sense or give me a call if that would be easier to clarify the situation.

Best,

Dylan Rose-Coss

Environmental Scientist
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

(505) 476-3488

From: Joel Lowry <joel@lowryenvironmental.com>
Sent: Wednesday, June 12, 2019 9:11 AM
To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>
Subject: [EXT] FW: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Dylan,

As per our conversation, attached is the Site Assessment Report and Proposed Remediation Workplan that has been prepared for ETC's 2B Pipeline (1RP-5265). We plan to dig and haul soil impacted above the NMOCD Closure Criteria along with that which is visibly stained. Thanks.

Respectfully,

Joel Lowry

Environmental Professional



PO Box 896
Lovington, NM 88260
Direct 432-466-4450

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From: Joel Lowry**Sent:** Friday, April 26, 2019 12:24 PM**To:** emnrd-ocd-district1spills@state.nm.us; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>**Cc:** Dean Ericson <dean.ericson@energytransfer.com>**Subject:** FW: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Please find attached a Site Assessment Report and Proposed Remediation Workplan along with the applicable pages from the Form C-141 that has been prepared for ETC's 2B Pipelin (1RP-5265) release site. This is one of three projects that we are waiting for approval on before beginning remediation activities. If you have any questions or need any additional information, please feel free to contact myself or Dean Ericson by phone or email. Thanks.

Respectfully,

Joel Lowry

Environmental Professional



PO Box 896
Lovington, NM 88260
Direct 432-466-4450

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From: Joel Lowry
Sent: Friday, March 22, 2019 11:43 AM
To: 'emnrd-ocd-district1spills@state.nm.us' <emnrd-ocd-district1spills@state.nm.us>
Subject: FW: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

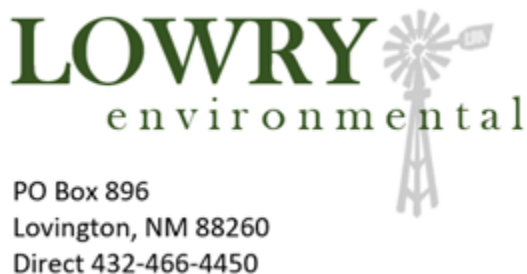
To whom it may concern,

I wanted to go ahead and send this over to ensure that it has been received. I have one more, similar project I will be resubmitting shortly. It is more of a reminder to myself! Thank you so much!

Respectfully,

Joel Lowry

Environmental Professional



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From: Joel Lowry
Sent: Thursday, February 28, 2019 8:12 AM
To: 'emnrd-ocd-district1spills@state.nm.us' <emnrd-ocd-district1spills@state.nm.us>
Subject: FW: 1RP-5265 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Included is a forwarded email that was sent to District 1 on January 4, 2019. Sample points NH-1 and EH-1 are pseudo-vertical delineation points. Outside of the release point, soil was either not affected above the NMOCD Closure Criteria and/or impacts are limited to the surface. We have proposed mitigating impacted soil affected above the NMOCD Closure Criteria along with visible impacts in the release flowpath and overspray area via waste excavation and removal. An area measuring approximately 12,500 has been visibly affected and will be remediated. Due to the size of the site, I have proposed collection of composite floor samples representing every 1,000 sq. ft. If necessary, I can adjust that to collection of composite floor samples representing every 500 sq. ft., which will result in approximately 25 floor samples.

If you have any questions or need any additional information, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel Lowry

Environmental Professional



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Direct 432-466-4450

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From: Joel Lowry
Sent: Friday, January 4, 2019 1:34 PM
To: christina.hernandez@state.nm.us
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Subject: 1RP-5264 - 2B Pipeline - Site Assessment Report and Proposed Remediation Plan

Ms. Hernandez,

Please find attached the Site Assessment Report and Proposed Remediation Plan that has been prepared for ETC's 2B Pipeline Release Site. The Release Site is located on private land in Unit Letter "N", Section 31, Township 24 South, Range 37 East in Lea County, New Mexico. Upon your review and approval, ETC is prepared to begin remediation activities as outland within the attached. If you have any questions or need any additional information, please feel free to contact myself or Dean Ericson by phone or email. Thanks.

Respectfully,

Joel Lowry
Environmental Professional



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