

**From:** [Yu, Olivia, EMNRD](#)  
**To:** ["John.Ferguson@ghd.com"](#)  
**Cc:** ["Camille Bryant"](#); [tom.larson@ghd.com](#); [cctofiling@croworld.com](#)  
**Subject:** RE: 074683-03 Plains-Darr Angell #1 AST Release Site (1RP-4796) Request to Backfill Excavated Release Area ~COR-074683-03~  
**Date:** Monday, January 29, 2018 8:20:00 AM  
**Attachments:** approved\_1RP4796\_BackfillRequest.pdf

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Good morning Mr. Ferguson:

NMOCD approves of the backfill request for 1RP-4796. In the subsequent closure/remediation report, please include an appropriately scaled map with the areas with differing excavated depths outlined and annotated. Provide photo documentation as well.

Thanks,

Olivia Yu  
Environmental Specialist  
NMOCD, District I  
[Olivia.yu@state.nm.us](mailto:Olivia.yu@state.nm.us)  
575-393-6161 x113

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

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**From:** John.Ferguson@ghd.com [mailto:John.Ferguson@ghd.com]  
**Sent:** Friday, January 26, 2018 10:25 AM  
**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>  
**Cc:** 'Camille Bryant' <CJBryant@paalp.com>; tom.larson@ghd.com; cctofiling@croworld.com  
**Subject:** 074683-03 Plains-Darr Angell #1 AST Release Site (1RP-4796) Request to Backfill Excavated Release Area ~COR-074683-03~

Ms. Olivia Yu,

Via this email, I am requesting permission to backfill the release area excavation (1RP-4796) located at the Plains-Darr Angell #1 Groundwater Remediation project site (Site) located in Lea County, NM). The Site is located on rural private land, owned by Mr. Darr Angell, in Section 11 (Unit O) , Township 15 South, Range 37 East and the geographical coordinates are 33.026481° N, -103.166871° W. The depth to groundwater at the Site is approximately 65 feet below ground surface (bgs) which gives the Site a Total Ranking of 10 - 19. In addition, I am also requesting that no further action is required in regards to the release area for the closure report and project file.

On August 25, 2017, confirmation soil sampling within the excavated release area was conducted

subsequent to removal of impacted soil. Analytical results indicated the BTEX & TPH from confirmation samples (CS-1 thru CS-9) were below the New Mexico Oil Conservation Division's (NMOCD) Recommended Remediation Action Levels (RRALs) determined for the Site. A total of approximately 55 yards of crude oil impacted soil were removed and stockpiled on plastic at the Site.

Subsequent to your email dated September 18, 2017, which requested horizontal delineation by collection of excavation wall or edge samples, on December 4, 2017, confirmation wall samples (WS-1 thru WS-8) were collected along the perimeter of the excavated area. Analytical results indicated the BTEX & TPH from WS-1 thru WS-8 were below the RRALs determined for the Site.

Furthermore and at the request of Mr. Darr Angell that all TPH results be below 100 mg/Kg, on December 5, 2017, an additional vertical confirmation sample was collected at CS-6 to determine the TPH concentration at an increased depth. As of this email, it is estimated that another 2-3 yards of soil will be removed in the area of CS-6 to accommodate Mr. Angell's request.

Attached is a Topographic Map depicting the Site's location, a Detailed Site Map, a Sample Location Map depicting sample locations/depths/soil analytical results, and an analytical data table.

Upon your approval, Darr Angell will be contacted so he can view the Site prior to backfilling, to determine the location of backfill material provided by him, and his restoration requirements.

Your timely response is appreciated and please contact me if you have questions or comments.

Best Regards,

**John M. Fergerson, PG**

**GHD**

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