

Rose-Coss, Dylan H, EMNRD

From: Rose-Coss, Dylan H, EMNRD
Sent: Thursday, June 13, 2019 2:37 PM
To: 'Joel Lowry'; 'jamos@blm.gov'
Subject: RE: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141
Attachments: 1RP-5234 - Cotton Draw 10-Inch - Pages from C-141 - Characterization_Workplan.pdf

Mr. Lowry,

The NMOCD approves the proposed remediation workplan for the Cotton Draw Pipeline release (1RP-5234), with the condition that chloride concentrations be delineated vertically to the NMOCD reclamation standards. Like approval from the BLM is also required.

Note: 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.

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 9:06 AM
To: Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; 'jamos@blm.gov' <jamos@blm.gov>
Subject: [EXT] FW: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141

Jim and Dylan,

As per our conversations, please find attached the *Site Assessment Report and Proposed Remediation Workplan* that has been prepared for ETC's Cotton Draw 10-Inch. As discussed, this project was originally submitted in December, during a time when everyone was still settling in to the new rule. The original contractor only submitted one soil sample from each test trench. I went out again in November with a hand-auger to collect and an additional representative soil sample proximate to the original sample location; the presence of a hard rock layer forced me to submit samples from shallower intervals.

Since then I believe that we are all doing things a little differently. Ideally, we would have delineated to the NMOCD Reclamation Standards as opposed to the NMOCD Closure Criteria beyond 4' bgs. If possible, an approval with the condition that impacts are delineated vertically to the NMOCD/BLM Reclamation Standard during remediation, would save us from having to mobilize a piece of equipment down there and strip out that pipeline an additional time.

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



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

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From: Joel Lowry

Sent: Friday, April 26, 2019 12:21 PM

To: emnrd-ocd-district1spills@state.nm.us; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Cc: Weaver, Crystal (caweaver@blm.gov) <caweaver@blm.gov>; Dean Ericson <dean.ericson@energytransfer.com>

Subject: FW: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141

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 Cotton Draw 10" (1RP-5234) 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



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From: Joel Lowry

Sent: Friday, March 22, 2019 11:44 AM

To: 'emnrd-ocd-district1spills@state.nm.us' <emnrd-ocd-district1spills@state.nm.us>

Subject: FW: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141

I believe that this is the last project that I have on my list. Thanks Y'all!

Respectfully,

Joel Lowry

Environmental Professional

LOWRY 
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From: Joel Lowry

Sent: Wednesday, February 27, 2019 6:39 AM

To: emnrd-ocd-district1spills@state.nm.us

Subject: FW: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141

From: Joel Lowry

Sent: Monday, December 3, 2018 7:53 AM

To: 'christina.hernandez@state.nm.us' <christina.hernandez@state.nm.us>; 'yjimenez@blm.gov' <yjimenez@blm.gov>

Cc: 'Ericson, Dean' <Dean.Ericson@energyTransfer.com>

Subject: 1RP-5234 - Cotton Draw Pipeline - Site Assessment Report and Proposed Remediation Workplan + Pages from C-141

Christina and Yolanda,

Please find attached the Site Assessment Report and Proposed Remediation Workplan that has been prepared for ETC's Cotton Draw Release, along with the applicable pages from the C-141. The Site is located in Unit Letter "N", Section 19, Township 25 South, Range 32 East on land administered by the Bureau of Land Management.

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

Respectfully,

Joel Lowry