

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, April 11, 2012 10:22 AM
To: 'Amber Cannon'
Subject: RE: 2RP-1039, Loving AIB State #1 2/14/2012 Release

Amber,

You may proceed with backfill/closure operations at this site.

Thank you,

Mike Bratcher

NMOCD District 2
811 S. First Street
Artesia, NM 88210
575-748-1283 Ext. 108
575-626-0857
mike.bratcher@state.nm.us

From: Amber Cannon [<mailto:ACannon@yatespetroleum.com>]
Sent: Monday, April 09, 2012 3:53 PM
To: Bratcher, Mike, EMNRD
Subject: FW: 2RP-1039, Loving AIB State #1 2/14/2012 Release

Mike,

Attached is an updated analytical summary table for the release mentioned in the email below. After our discussion on 3/26/2012 you asked YPC to further delineate section 5 for chlorides. YPC did so and you will find that chloride levels in section 5 dropped significantly (report 439930). Yates Petroleum would like to request permission to backfill/closure based on the analytical results and the fact that Yates has dug out section 5 (highlighted green) through 6' as you previously asked.

Should you have any questions, please let me know.

Thanks,
Amber

From: Amber Cannon
Sent: Tuesday, March 20, 2012 10:31 AM
To: Bratcher, Mike, EMNRD (mike.bratcher@state.nm.us)
Subject: 2RP-1039, Loving AIB State #1 2/14/2012 Release

Mike,

Attached is a table summarizing analytical results as well as a site diagram for 2RP-1039, Loving AIB State #1 2/14/2012 release. Yates Petroleum would like to request permission to submit a Final C-141 for this release based on the following:

- The release amount and impacted soils were excavated and disposed of at an NMOCD approved facility.
- Two (2) feet of soils were excavated from sections 1, 2, 3, 4, and 6. We are confident that all impacted soils from this release were excavated as the spill amount was so small, there is no way it could have traveled any deeper.
 - If we were to delineate samples any further in Sections 1-4 we would run into the high chlorides that we were allowed to leave in place from the July 17, 2011 release. We propose to take no further action in these sections.
 - Section 6 did not have a chloride problem as shown by the analytical results, and we propose to take no further action in this section.
- Four (4) feet of soils were excavated from section 5. We excavated these 4' due to the high sample results we received on samples taken 2/28/2012 and based off the fact that this small area was not hit from the previous July 17, 2011 release. For this section we would like to do as we did on the July 17, 2011 release and leave the chlorides past 4' in place and cover with a 4' cap.

Thank you for your time in this matter.

Amber Cannon

Environmental Regulatory Agent
Yates Petroleum Corporation
Office: (575) 748-4111
Cell: (575)-513-8799

Bratcher, Mike, EMNRD

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Sent: Monday, April 09, 2012 3:53 PM
To: Bratcher, Mike, EMNRD
Subject: FW: 2RP-1039, Loving AIB State #1 2/14/2012 Release
Attachments: LovingAIBState1_Sample Table_021412.xlsx

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Amber Cannon

Environmental Regulatory Agent

Yates Petroleum Corporation

Office: (575) 748-4111

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LOVING AIB STATE #1

Release 2/14/2012

| Analytical Report-H200473 | Sample Area | Sample Date | Sample Type | Depth | BTEX | GRO | DRO | TOTAL | Chlorides |
|---------------------------|--------------|-------------|--------------|-------|------|-----|-----|-------|-----------|
| West 3 (S 1-3') | Release Area | 2/21/2012 | Grab/Backhoe | 3' | ND | ND | ND | ND | 112 |
| West 4 (S 1-4') | Release Area | 2/21/2012 | Grab/Backhoe | 4' | ND | ND | ND | ND | 352 |

| Analytical Report-437856 | Sample Area | Sample Date | Sample Type | Depth | BTEX | GRO | DRO | TOTAL | Chlorides |
|--------------------------|--------------|-------------|--------------|-------|------|-----|-----|-------|-----------|
| TH 3' | Release Area | 2/28/2012 | Grab/Backhoe | 3' | ND | ND | ND | ND | 16,000 |
| TH 4' | Release Area | 2/28/2012 | Grab/Backhoe | 4' | ND | ND | ND | ND | 20,300 |

| Analytical Report-438611 | Sample Area | Sample Date | Sample Type | Depth | BTEX | GRO | DRO | TOTAL | Chlorides |
|--------------------------|--------------|-------------|--------------|-------|------|-----|-----|-------|-----------|
| S 2-3' | Release Area | 3/12/2012 | Grab/Backhoe | 3' | N/A | N/A | N/A | N/A | 226 |
| S 2-4' | Release Area | 3/12/2012 | Grab/Backhoe | 4' | N/A | N/A | N/A | N/A | 1280 |
| S 3-3' | Release Area | 3/12/2012 | Grab/Backhoe | 3' | N/A | N/A | N/A | N/A | 399 |
| S 3-4' | Release Area | 3/12/2012 | Grab/Backhoe | 4' | N/A | N/A | N/A | N/A | 188 |
| S 4-3' | Release Area | 3/12/2012 | Grab/Backhoe | 3' | N/A | N/A | N/A | N/A | 225 |
| S 4-4' | Release Area | 3/12/2012 | Grab/Backhoe | 4' | N/A | N/A | N/A | N/A | 707 |
| S 5-5' | Release Area | 3/12/2012 | Grab/Backhoe | 5' | N/A | N/A | N/A | N/A | 16100 |
| S 5-6' | Release Area | 3/12/2012 | Grab/Backhoe | 6' | N/A | N/A | N/A | N/A | 16500 |
| S 5-7' | Release Area | 3/12/2012 | Grab/Backhoe | 7' | N/A | N/A | N/A | N/A | 9210 |
| S 5-8' | Release Area | 3/12/2012 | Grab/Backhoe | 8' | N/A | N/A | N/A | N/A | 10400 |
| S 6-3' | Release Area | 3/12/2012 | Grab/Backhoe | 3' | N/A | N/A | N/A | N/A | 27.4 |
| S 6-4' | Release Area | 3/12/2012 | Grab/Backhoe | 4' | N/A | N/A | N/A | N/A | 43.6 |

| Analytical Report-439930 | Sample Area | Sample Date | Sample Type | Depth | BTEX | GRO | DRO | TOTAL | Chlorides |
|--------------------------|--------------|-------------|--------------|-------|------|-----|-----|-------|-----------|
| S 5-9' | Release Area | 3/30/2012 | Grab/Backhoe | 9' | N/A | N/A | N/A | N/A | 58.8 |
| S 5-10' | Release Area | 3/30/2012 | Grab/Backhoe | 10' | N/A | N/A | N/A | N/A | 73.1 |
| S 5-11' | Release Area | 3/30/2012 | Grab/Backhoe | 11' | N/A | N/A | N/A | N/A | 37.9 |
| S 5-12' | Release Area | 3/30/2012 | Grab/Backhoe | 12' | N/A | N/A | N/A | N/A | 62.5 |

Site Ranking is TWENTY (20). Depth to Ground Water <50' (approx. 55', Section 16-23S-28E, per NMOSE).

All results are ppm. Chlorides for documentation.

Released: 5 B/PW; Recovered: 0 B/PW. Release Date: 2/14/2012