AP - 082

GENERAL CORRESPONDENCE

2008-2010

Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Wednesday, April 07, 2010 8:26 AM
To: 'Cliff P. Brunson'
Subject: RE: Hess-Former Texaco Mattern Battery #26 - AP-82

Cliff,

You may proceed with the plugging of MW-5 and backfilling of the excavated area at the Mattern Battery. Please retain this email in your files as no written approval will be forwarded. I look forward to reviewing the upcoming report. Thank you.

Jim Griswold, OCD

From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Monday, April 05, 2010 3:15 PM
To: Griswold, Jim, EMNRD
Cc: Ken Swinney; Jennifer Gilkey; Jay Baker; Rick Gillespie
Subject: Hess-Former Texaco Mattern Battery #26 - AP-82

Jim,

I wanted to follow up on our conversation on Monday, March 22, 2010. First, let me say thank you for meeting with us and working with Hess on their projects. This message is to confirm the topics and path forward that we all discussed for the above referenced site.

As you recall, Hess requested to backfill the open excavation site. In order to proceed with this task, it will be necessary to plug and abandon MW-5 that is in the center of the deep excavation. During our meeting, we reviewed the site diagram and the laboratory data that indicated groundwater quality was below the WQCC regulated standards and therefore, the NMOCD agreed to allow the plugging of MW-5. I have contacted the Roswell district office of The Office of the NM State Engineer and obtained a Plugging Record form that will be filled out upon completion of the monitor well plugging. I was given verbal permission to plug the well. They said it was not necessary to submit a plan in advance; just submit the completed form when the plugging is completed.

We will be completing an addendum to the Phase I report that will include the additional site activities since the initial report that includes drilling and sampling soil borings and installing and sampling monitor wells. This report will include site diagrams, gradient maps, and all laboratory data associated with these recent activities. In addition, the report will include a recommendation for a path forward on this site.

Therefore, I respectfully request a return written authorization to plug and abandon MW-5 and the backfilling of the excavation site. I look forward to your response.

Thank you,

Cliff Brunson

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Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Thursday, July 03, 2008 11:17 AM
To: Cliff Brunson (cbrunson@bbcinternational.com)
Subject: AP-82, Hess Corp, Mattern Battery

Attachments: AP-82 proposed wells and borings.pdf

Hello again Cliff,

I suppose you won't get a chance to review this until you have returned, so I hope you had a great time.

Regarding the Stage 1 Abatement Plan AP-82 for the Hess Corporation's Texaco Mattern Battery #26 near Monument, I have the following comments/needs:

It is stated on page 2 of the plan that the Mattern 3 and 4 samples gathered on 1/3/07 were "*...located nearest the former tank pad.*" I surmise this to mean the tank pad was situated between these locations. Could the former pad be specifically located on future drawings?

Was the green dashed area located just east of your proposed SB1/MW1 location on Figure 3 excavated? If so, why?

What was the reason for the "scraped areas"?

The text discusses a "*two foot test hole*" advanced in the western floor of the associated pit excavation "*...where hydrocarbon stained soils extended deeper.*" on 1/22/07 when groundwater was encountered. Figure 3 seems to indicate test holes were advanced in three areas, all of which revealed at least a sheen of oil floating atop the water table. Photographs of two of those test holes are provided in Appendix II

Under the WQCC Regulations (Title 20 Chapter 6 Part 2.4106 C) Stage 1 of an abatement plan "*...will adequately define site conditions, and provide the data necessary to select and design an effective abatement option.*" Delineation of the lateral extents of contamination (i.e. finding out where contamination does not exist) is obviously only a part of the investigatory process. Characterization of the areas where soil and groundwater contamination are present is also required. As such:

A soil boring must be advanced within the area of the associated pit and a groundwater monitoring well must be completed at that location (marked A on the attached figure).

The location of SB-1/MW-1 should be moved nearer the area of likely highest contamination (see location B on the figure).

An additional soil boring should be placed in the area northeast of the associated pit (location C) to assess possible hydrocarbon soil contamination with a goal of delineating TPH to less than 100 ppm. An additional soil boring must be placed in an area west of the pit excavation (location D) based on the data observed from the West Wall sample taken on 1/10/07. Whether or not monitoring wells are installed at either or both of these locations should be made based on field observations.

Due to the concentration of adsorbed chlorides in the soil samples (designated Mattern 3 and 4) taken at shallow depths near the former tank pad, an additional soil boring/monitoring well must be installed in that area (location E). Soil borings should also be advanced in areas east and west (locations F and G) of this location with a goal of delineating the concentration of chloride in soil to less than 250 ppm. This may necessitate the installation of monitoring wells in those lateral areas.

At least two samples from each boring should be submitted for laboratory analysis. Please add to the list of soil tests already included in your Stage 1 abatement plan assays for TRPH via Method 418.1, and "general chemistry" by methods described in 40 CFR 136.3 to include fluoride, calcium, sodium, potassium, magnesium, bicarbonate and carbonate alkalinity, sulfate, phosphate, and bromide.

The plan mentions wells screens with 0.040" slots. Is this a typo? I didn't know 40-slot existed.

The top-of-casing elevation of each new well needs to be surveyed to an accuracy of 0.01 feet and the site map updated.

As part of the sampling process, each well should be gauged for depth-to-NAPL (if any) and depth-to-water from each surveyed mark, along with total well depth, all to an accuracy of 0.01 feet. Groundwater samples must be gathered from each well regardless of the presence of NAPL. For wells with NAPL, use a bailer to retrieve groundwater immediately beneath the layer of oil. On those wells were product is not apparent and a pump is used, it must be situated within the upper half of the saturated interval of the well and this pumping depth must be noted along with the purging rate, total purged volume, and observed drawdown (if possible).

Groundwater samples need to be analyzed by each of the methods defined in the abatement plan as wells as for fluoride, calcium, sodium, potassium, magnesium, bicarbonate and carbonate alkalinity, sulfate, phosphate, bromide, and TDS. The scope of these assays, including the requirement to sample wells containing NAPL, may be reduced in subsequent quarterly monitoring depending on the available data.

No mention was made in the plan regarding the disposition of generated wastes. Clean soil cuttings can be spread at the site. Contaminated soils should either be containerized and disposed or placed on sheet plastic within a berm for later disposal. Developed groundwater along with that purged during sampling needs to be contained and properly disposed.

Implement a contingency plan for the recovery of NAPL from monitoring wells.

When reporting on these efforts, provide all headspace data along with any written visual field assessments for all soil borings. Provide logs for all bores whether or not they are completed as wells. Provide completion logs for all wells including screened intervals.

Jim Griswold
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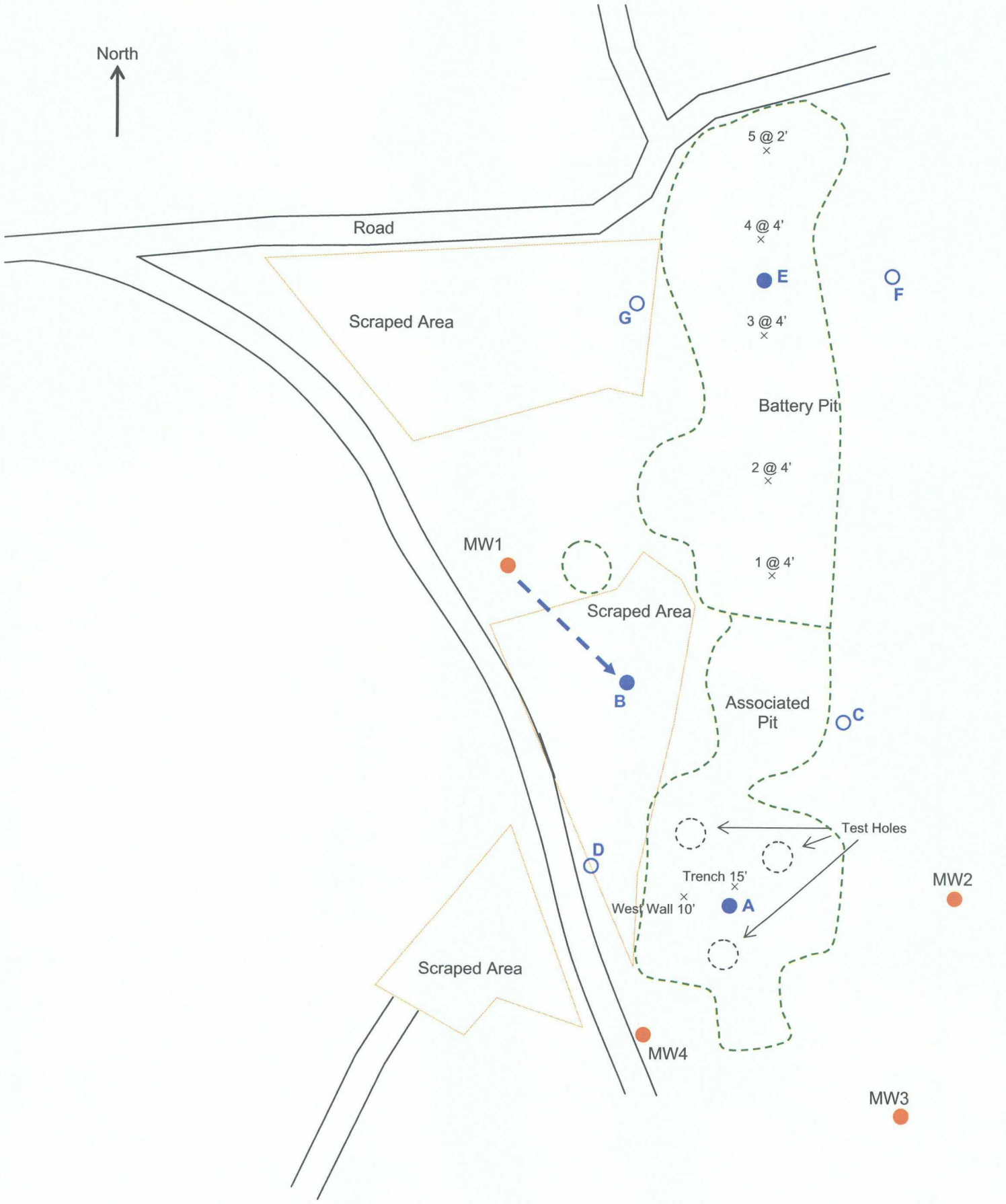
AP-82 proposed
wells and borin...



Pending Soil Boring/Monitoring Well Locations
AP-82: Texaco Mattern Battery #26
Hess Corporation
Units L & K, Section 20, T19S, R37E
(based on BBC International, Inc. drawing of 3/1/07)

0 100 200 feet