

AP - 055

APPROVALS

2008 - Present

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, September 12, 2008 8:27 AM
To: 'Weathers, Stephen W'
Cc: Price, Wayne, EMNRD; VonGonten, Glenn, EMNRD
Subject: RE: DCP Midstream, LP RR Ext. Pipeline Release (AP-55)

Mr. Weathers:

Re: AP-55 Remediation of Point Source

The OCD approves the point source removal proposal with the condition that further plume delineation with monitoring is required to monitor the success of the point source removal.

The water table at about 25 ft. below ground surface and track hoe should be capable of reaching the water table. Some volatilization, aeration and bioremediation will occur at the source in the process enhancing or expediting the remediation.

The source removal coupled with monitoring would help to determine the success of the point source removal. Further plume delineation to toward the south and west to defined the western fringe and toe of the plume will be needed to verify the success of source removal.

Please contact me if you have questions. Thank you.

Please be advised that NMOCD approval of this plan does not relieve DCP Midstream, LP of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve DCP Midstream, LP of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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(Pollution Prevention Guidance is under "Publications")

From: Weathers, Stephen W [mailto:SWWeathers@dcpmidstream.com]
Sent: Wednesday, September 10, 2008 3:49 PM
To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD
Subject: RE: DCP Midstream, LP RR Ext. Pipeline Release (AP-55)

Carl

This email is to summarize our phone call this afternoon.

DCP has completed the additional investigation activities that were discussed in the May 28th 2008 report. Three groundwater wells were installed. MW-8 was installed approximately up gradient from MW-1. MW-8 was miss identified and called out as MW-7 in the submitted work plan. The two other monitor wells (MW-6 and MW-7) were installed cross gradient from the source area. The locations were picked to bound the impacts identified in

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MW-3. The report for the additional investigation activities along with the 2nd quarter groundwater sampling event will be submitted to the OCD early next week. An official notice will also be submitted notifying the OCD of the upcoming 3rd quarter groundwater sampling event that is scheduled for Wed, Sept 17th 2008.

Chlorides will be added to the list of parameters for the upcoming groundwater sampling event. Also, all monitor wells are first inspected for free product before they are purged and sampled.

Based on discussions with operations, there has been a limited amount of source material removed. DCP would like to request to move forward with additional source removal. Below is a very brief work plan for source removal. If a more formal work plan is needed, just let me know.

DCP would like to request approval to complete source removal at the DCP RR Ext Pipeline Release Location. Groundwater monitor wells have been installed to help delineate groundwater impacts. This work was completed based on the February 8, 2008 OCD emergency approval of the submitted work plan. During the groundwater delineation field work, it was determined that there was significant source material remaining in place. DCP would like to remove the impacted soil were practical. If not all of the impacted material can be removed due to safety reason and/or limitations of the onsite equipment, upon approval from the OCD, DCP will place a liner in the excavation and backfill to surface. Soil samples will be collected during the excavation process and a letter report summarizing the field activities will be provided after the work is completed. Upon completion of the source removal activities, DCP will submit for approval a work plan to install additional groundwater monitor wells south to southwest of the release area to fully delineate the groundwater impacts.

Based on your approval, DCP anticipates starting the field activities as soon as possible. A 48 hour notification will be provided to Larry Johnson before any field activities are started.

If you need information or have additional questions, please give me a call at 303.605.1718.

Thanks

Steve Weathers
DCP Midstream, LP

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, September 10, 2008 11:18 AM
To: Weathers, Stephen W
Cc: Price, Wayne, EMNRD
Subject: DCP Midstream, LP RR Ext. Pipeline Release (AP-55)

Mr. Weathers:

I am in receipt of the American Environmental Consulting, LLC Site Investigation Report (report) & Proposed Additional Activities dated May 28, 2008 at the above location. I notice you were planning to be on site to complete proposed activities in June or July of 2008. You may have already completed the work. In general, I notice that proposed down gradient well locations (MWs 6 & 7) do not correspond to the piezometric surface map (Figure 3) in the report and laboratory testing does not consist of sampling at the water table, BTEX analysis, etc.

OCD comments based on Page 3 "Proposed Additional Activities" of the report are as follows:

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- 1) There are 3 additional wells (MWs 6, 7 and 8) but only MWs 6 and 7 are discussed. In Figure 5, MW-8 is installed north of MW-1 instead of MW-7 as you describe in the report. You indicated that MW-7 will be installed upgradient of MW-1, but MW-8 is depicted in Figure 5 of the report. Based on the ground water flow direction map (Figure 3), MWs 6 and 7 are not located downgradient of the hot spot locations (MWs 1 and 2). MW-8 appears to be an upgradient well to define the upgradient or northern boundary of the plume. There is no mention of collecting a ground water sample at the water table.
- 2) All drilling to the water table shall include a ground water sample with the appropriate environmental analyses.
- 3) Analytes to be tested in water media shall include at a minimum BTEX, TPH, and Chlorides.
- 4) Recommended locations downgradient from hot spot wells (ex., MW1 and MW-2) would appear to be toward the south based on the piezometric surface map in the report. Locations should provide additional piezometric surface data to assist with the downgradient determination over time.

Please contact me if you have questions. Thanks.

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