

From: Patterson, Heather, EMNRD
To: ["bjarguijo@basinenv.com"](mailto:bjarguijo@basinenv.com)
Subject: Palladium 7-1
Date: Wednesday, May 20, 2015 7:00:00 AM

Mr. Arguijo,

Your work plan is approved.

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.

If you have any questions or concerns, and for notification, please contact me.

In the future, please remit your work plans to both Mr. Bratcher and myself to ensure a timely review.

Heather Patterson
Environmental Specialist
NMOCD District II
Office (575)748-1283 ext.101
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From: Dade, Randy, EMNRD
Sent: Tuesday, May 19, 2015 9:54 AM
To: Patterson, Heather, EMNRD
Subject: FW:

From: Ben J. Arguijo [<mailto:bjarguijo@basinenv.com>]
Sent: Monday, May 18, 2015 8:14 AM
To: Dade, Randy, EMNRD; Randy Pair
Cc: Camille J. Bryant; Bobby Blackwood; sjwalters@basinenv.com
Subject:

Mr. Dade and Mr. Pair,

Attached please find an *Environmental Site Summary & Spill Remediation Plan* (Work Plan) for the Plains All American Pipeline, LP (Plains), release site known as Palladium 7-1 4-Inch Poly.

As has been discussed on-site and via telephone, the crude oil release occurred in March 2013 and was initially estimated to be approximately one-half of a barrel (0.5 bbl) in size. The site fell through the cracks as a result of personnel transitions but was revisited last month. Laboratory analytical results and field-screens from samples collected during delineation activities conducted on April 16 and April 29, 2015, indicated the release was actually greater than or equal to five barrels (=5 bbls). The release was subsequently reported to both the

NMOCD Artesia District Office and the BLM Carlsbad Field Office. An amended C-141 is included in the attached Work Plan.

Plains and Basin Environmental request permission to commence the following delineation activities described in the Work Plan posthaste:

"The area around delineation trench TT-1 will be excavated to approximately five feet (5') bgs to allow access for heavy equipment to further advance the trench. The trench will be advanced to the extent practicable. Soil samples will be collected at one (1) to two-foot (2') vertical intervals and field-screened with a PID. A representative selection of samples will be submitted to the laboratory for confirmatory analyses of BTEX, TPH, and/or chloride concentrations using the EPA laboratory analytical methods described above. If vertical delineation cannot be achieved via trenching, a drilling rig will be employed to advance one (1) soil boring (SB-1) in the area of trench TT-1."

Please review the Work Plan at your earliest convenience. I look forward to hearing back from you.

Thank you for your time and consideration.

Respectfully,
Ben J. Arguijo

Ben J. Arguijo
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