

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Thursday, September 14, 2017 9:18 AM
To: 'Stanley, Curtis D.'; Tucker, Shelly; Weaver, Crystal, EMNRD
Cc: 'Camille J Bryant'
Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher
NMOCD District 2
811 South First Street
Artesia, NM 88210
575-748-1283 Ext 108

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.

From: Stanley, Curtis D. [mailto:CDStanley@trcsolutions.com]
Sent: Tuesday, September 5, 2017 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E
2RP-4147
32.039556° 104.232184°
ULT K, Section 18, Township 26 South, Range 27 East NMPM
Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



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