

From: [Yu, Olivia, EMNRD](#)
To: "Lowry, Joel W"
Cc: "Camille J Bryant"
Subject: RE: 1RP-4406 RE: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill
Date: Tuesday, February 28, 2017 1:25:00 PM
Attachments: [Signed 1RP-4406 - Final C-141.pdf](#)
[Closed 1RP-4406 - Lynch Station Tank Line 1459 - Remediation Summary and Closure Report.pdf](#)

Dear Mr. Lowry:

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers 1RP-4406 closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

NB: The signed Final C-141 is a previous version of the C-141 form. Please use the current form.

Thanks,
Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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: Yu, Olivia, EMNRD
Sent: Monday, February 27, 2017 12:15 PM
To: 'Lowry, Joel W' <Joel.Lowry@terracon.com>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: 1RP-4406 RE: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Mr. Lowry:

Received. I will get back to you as soon as possible.

Thanks,
Olivia

From: Lowry, Joel W [<mailto:Joel.Lowry@terracon.com>]
Sent: Monday, February 27, 2017 12:07 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: 1RP-4406 RE: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Ms. Yu,

Please find attached an electronic copy of the *Remediation Summary and Closure Report* along with the Final C-141 that has been prepared for the Lynch Station Tank Line 1459 remediation project. Also attached is a Groundwater Gradient Map that has been prepared for the site as you requested. If you have any questions or need any additional information, please feel free to contact myself or Camille by phone or email. Thanks.

Respectfully,

Joel W. Lowry
Project Geologist I | Environmental

Terracon

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joel.lowry@terracon.com I terracon.com



From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Monday, February 27, 2017 11:05 AM

To: Lowry, Joel W <Joel.Lowry@terracon.com>

Subject: RE: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Good morning Joel:

When you get a chance, could you please send an electronic copy of the closure report for 1RP-4406 to me? Dr. Oberding and I will be reviewing it together.

Thanks!
Olivia

From: Lowry, Joel W [<mailto:Joel.Lowry@terracon.com>]

Sent: Thursday, February 9, 2017 8:40 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Subject: FW: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Olivia,

Included is the RP No. and the most recent email correspondence for the release that we discussed yesterday. The proposed activities have been completed and confirmation soil samples have been collected. I wanted to send this over to you so that you might be able to familiarize yourself with the project a little before our meeting. Thanks.

Respectfully,

Joel Lowry

From: Lynch, Kristen, EMNRD [<mailto:Kristen.Lynch@state.nm.us>]
Sent: Friday, October 7, 2016 10:37 AM
To: Lowry, Joel W <Joel.Lowry@terracon.com>
Cc: Camille J Bryant <CJBryant@paalp.com>
Subject: RE: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Good Morning,

Based on documents provided, NMOCD grants permission to backfill and haul affected soil to NMOCD Permitted Facility.

If you have any questions please let me know.

Thank You,

*Kristen D. Lynch
Environmental Specialist, District 1
Oil Conservation Division, EMNRD
(575) 393-6161 ext. 111
575-370-3180 (emergency-cell)*

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: Lowry, Joel W [<mailto:Joel.Lowry@terracon.com>]
Sent: Friday, October 07, 2016 7:51 AM
To: Lynch, Kristen, EMNRD
Cc: Camille J Bryant
Subject: Plain's Lynch Station Tank Line 1457 - Permission to haul affected soil to NMOCD Permitted Facility and Backfill

Ms. Lynch,

The following email has been prepared in regard to Plains' Lynch Station environmental remediation site. The site is located in Unit Letter "G" of Section 34, Township 20 South, Range 34 East. The initial Form C-141 indicated that the release was attributed to the failure of a 12" crude oil pipeline due to external corrosion, resulting in the release of approximately 250 bbls of crude oil. During initial response activities, approximately 200 bbls of free-standing oil was recovered and saturated soil was scrapped up and placed on

polyurethane liner, pending final disposition. The depth to groundwater at the release site is estimated to be approximately 80' bgs.

On August 10, 2016, excavation activities commenced at the release site. The floor and sidewalls of the excavation were advanced until field observations suggested soil affected above the NMOCD Recommended Remediation Action Levels had been removed.

On August 11, 2016, Terracon collected three (3) confirmation soil samples (Floor #3, Floor #6 and Floor #7) from the floor of the excavated areas and submitted them to the laboratory for analysis of TPH and BTEX concentrations which were determined to be less than the NMOCD Recommended Remediation Action Level. In addition the unexcavated release point (TT-1) along with three (3) additional areas (SB-2, SB-4 and SB-5) were delineated in an effort to determine the vertical extent of soil impacts and establish a target depth. Laboratory analytical results indicated soil was not affected above NMOCD Recommended Remediation Action Levels beyond 9' bgs in the area characterized by TT-1, 2' bgs in the area characterized by sample point SB-2 or 3' bgs in the area characterized by sample point SB-4. Analytical results indicated soil was affected above NMOCD Recommended Remediation Action Levels for TPH beyond 2.5' bgs in the area characterized by sample point SB-5.

Excavation activities continued at the release site. Impacted soil in the area characterized by the release point and TT-1 was excavated to approximately 10' bgs. Impacted soil in the areas characterized by sample point SB-2 was excavated to approximately 2' bgs. Impacted soil in the areas characterized by sample points SB-4 and SB-5 was excavated to approximately 3' bgs. Excavated material was stockpiled on-site, atop a polyurethane liner, pending final disposition.

On September 22, 2016, Terracon collected confirmation soil samples from the floor and sidewalls of the excavated areas on approximately 50' increments and submitted them to the laboratory for analysis of BTEX and TPH concentrations. Laboratory analytical results indicated BTEX and TPH concentrations were below the NMOCD Recommended Remediation Action Levels in each of the submitted soil samples with the exception of soil sample **Floor #2 @ 18"** and **WSW #2**, which exhibited TPH concentrations of **3,820** and **1,310** mg/kg, respectively. The confirmation soil sample collected from the base of the excavation adjacent to the release point was also analyzed for concentrations of chloride which were determined to be 13.6 mg/kg.

Plain's proposes the following remediation activities to help advance the site toward and NMOCD-approved closure:

- Begin transporting impacted soil to Lazy Ace Landfarm (NM1-0041)
- Backfilling of the excavated areas exhibiting BTEX and TPH concentrations below NMOCD Recommended Remediation Action Levels with locally purchased, non-impact material.
- Excavating affected soil exhibiting TPH concentrations above NMOCD Recommended Remediation Action Levels in the areas characterized by soil samples **WSW #2** and **Floor #2**. (This cannot be achieved until the excavated area adjacent to the release point has been backfilled as the route is blocked by the open excavation and above ground pipelines.)
- Upon excavating affected soil in the areas characterized by soil samples **WSW #2** and **Floor #2**, confirmation soil samples will be collected to ensure impacted soil affected above NMOCD Recommended Remediation Action Levels has been removed. Excavated soil will be placed in the existing soil stockpiles, pending final disposition.

- Excavated soil currently stockpiled on-site, will be transported with appropriate manifests to an NMOCD-approved landfarm, permitted to accept the material.
- Upon completion of excavation activities and receipt of final laboratory analytical results from confirmation soil samples, the remaining portions of the remediation site will be backfilled. Excavation backfill will be compacted and graded to meet the needs of the facility.

Upon completion of remediation activities, a Final C-141 will be prepared along with a *Remediation Summary and Site Closure Request* detailing field activities and laboratory analytical results from confirmation soil samples. If you have any questions or need any additional information, please feel free to contact myself or Camille Bryant by phone or email. Thanks.

Respectfully,

Joel Lowry

Attachments: Attachment #1 – Site and Sample Location Map, Soil Chemistry Table
Attachment #2 – Laboratory Analytical Report for Waste Characterization
Soil Sample

Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

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