From: Yu, Olivia, EMNRD
To: "Bob Allen"

Cc: "garrett.woods@hollyenergy.com"; "Nolan, Melanie A."; "Tara Martin"; "Sergio Contreras"; "jsosa@sesi-nm.com"

Subject: RE: Holly Crouch Mesa 8"

Date: Tuesday, February 6, 2018 8:51:00 AM

Mr. Allen:

Furthermore, as mentioned during the field visit on February 1, 2018, please include an appropriately scaled aerial map in the remediation report with these items: 1) the pipeline marked; 2) the 3 ft. radius for deferral of delineation and remediation on either side of the pipeline outlined; and 3) delineation and confirmation bottom and sidewall samples demarcated with GPS coordinates.

Thanks, Olivia

From: Yu, Olivia, EMNRD

**Sent:** Tuesday, February 6, 2018 8:42 AM **To:** 'Bob Allen' <br/>
<a href="mailto:ballen@sesi-nm.com">ballen@sesi-nm.com</a>

**Cc:** garrett.woods@hollyenergy.com; Nolan, Melanie A. <Melanie.Nolan@hollyenergy.com>; Tara Martin <office2@sesi-nm.com>; Sergio Contreras <scontreras@sesi-nm.com>; jsosa@sesi-nm.com

**Subject:** RE: Holly Crouch Mesa 8"

Good morning Mr. Allen:

NMOCD agrees with the proposed course of action for 1RP-4885 on the condition that the impacted area- outside of the 3 ft. radius around the pipeline- has complete vertical and horizontal delineation while remediating. Please note the clarifications on the email dated February 2, 2018. See attachment.

Thanks, Olivia

From: Bob Allen [mailto:ballen@sesi-nm.com]
Sent: Monday, February 5, 2018 7:12 AM

To Mark Collision Shades and Shades a

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

**Cc:** garrett.woods@hollyenergy.com; Nolan, Melanie A. < Melanie.Nolan@hollyenergy.com >; Tara Martin < office2@sesi-nm.com >; Sergio Contreras < scontreras@sesi-nm.com >; jsosa@sesi-nm.com

Subject: Holly Crouch Mesa 8"

Good Morning!

This email will verify my understanding of the results of the meeting on Thursday February 1 2018 on location with you, myself, Garrett Woods and Melanie Nolan. Holly Energy Partners will proceed with the excavation and removal of all TPH and BTEX contaminated soil outside the 3' protected area on either side of the pipeline. The contaminated soil left in place will be deferred until the line

is decommissioned. At that time, the contaminated soil will be removed and transported to a NMOCD disposal facility and the area will be returned to natural grade and reseeded.

Bob Allen CSP, CHMM Cell 575-390-7063 Office 575-397-0510 From: Yu, Olivia, EMNRD

To: "Tara Hodges"; "mnaranjo@slo.state.nm.us"

Cc: "Melanie Nolan"; "ballen@sesi-nm.com"; Billings, Bradford, EMNRD

Subject: RE: Holly Energy Partners 8inch Crouch Line Work Plan

**Date:** Friday, February 2, 2018 4:38:00 PM

Mr. Allen:

As requested, I conferred with NMOCD-Santa Fe regarding your questions for 1RP-4885.

- 1. NMOCD would consider deferral of remediation under the active crude pipeline if delineation is complete for the release area.
- 2. Please be advised that delineation via excavation is considered to be conducted at risk.
- 3. As with any release, representative soil samples must be submitted for laboratory analyses of chlorides. NMOCD would consider delineation complete for chlorides if there are less than <= 600 mg/kg chlorides in at least two depths: depth obtained and depth maintained 2 ft. further in depth.
- 4. NMOCD would also accept background samples of chlorides for consideration.

Please confirm or inform for clarification.

Thanks, Olivia

From: Yu, Olivia, EMNRD

**Sent:** Tuesday, January 23, 2018 2:23 PM

**To:** 'Tara Hodges' <office2@sesi-nm.com>; mnaranjo@slo.state.nm.us **Cc:** Melanie Nolan <Melanie.Nolan@hollyenergy.com>; ballen@sesi-nm.com

**Subject:** RE: Holly Energy Partners 8inch Crouch Line Work Plan

Mr. Allen:

Please clarify these concerns regarding 1RP-4885:

- 1. As there are 3 NMOSE identified water wells within 1000 ft. of the release location, adjust RRALS accordingly.
- 2. What were the approximate distances of the 4 test trenches for delineation from the release point?
- 3. At what depths were the samples taken from the walls of these trenches?
- 4. Are there field data for delineation between the surface and bottom of TT5 at 7 ft. bgs?
- 5. The laboratory results do not indicate that the soil has been contaminated. Is the inference that all 10 bbls of unrecovered oil are within the 3 ft. radius of pipeline?

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:** Tara Hodges [mailto:office2@sesi-nm.com]

**Sent:** Monday, January 15, 2018 2:11 PM

**To:** Yu, Olivia, EMNRD < Olivia. Yu@state.nm.us >; mnaranjo@slo.state.nm.us **Cc:** Melanie Nolan < Melanie. Nolan@hollyenergy.com >; ballen@sesi-nm.com

**Subject:** Holly Energy Partners 8inch Crouch Line Work Plan

Hello!

I have attached, per Bob Allen SESI, the proposed work plan for the Holly Energy Partners 8 inch Crouch Line. Please review and let us know if you have any questions.

## Thank You

## Tara Hodges

Safety & Environmental Solutions, Inc. 703 East Clinton Street Hobbs, NM 88240 Office: (575) 397-0510