

From: Tucker, Shelly
To: [Yu, Olivia, EMNRD](#)
Cc: [Brandon, Alan K.](#); [Yolanda Jordan](#); [Ericson, Dean](#); cctofiling@croworld.com
Subject: Re: [EXTERNAL] RE: 11135250-01 2C-14-3 10" (1RP-4583) updated Remediation Summary Report ~COR-11135250-01 ~
Date: Wednesday, September 19, 2018 4:02:09 PM

BLM concurs with NMOCD approval.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
O&G Spill/Release Coordinator

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

Bureau of Land Management
620 E. Greene St
Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. **In such an event a site does not achieve successful restoration, or future issues with contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the location is successfully reclaimed.** In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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NOTE: LPC Timing Stipulations - from March 1st through June 15th. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

On Wed, Jul 25, 2018 at 3:44 PM Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

Mr. Brandon:

NMOCD will grant backfill approval for 1RP-4583 with these conditions:

1. Additional confirmatory sidewall samples at no greater than 50 ft. intervals are required. All sidewall samples will need to be tested for TPH extended and chlorides.
2. Due to elevated Benzene and/or total BTEX levels presented in the delineation data at 4.5 ft. and 6 ft. bgs, confirmation samples need to be tested for Benzene and BTEX at these sidewalls: North side of the excavation and West of Sample locations 31 and 33.
3. In the closure report, please clearly outline the sections with 4 ft. and 8 ft. excavation, lined areas, and reserve pit location. If the excavated area is extended, please

- demarcate new footprint.
4. Provide dated photo documentation of the remedial process, including proper emplacement of a minimal 20 mil liner.

Please confirm or inform for clarification.

Thanks,

Olivia

From: Alan.Brandon@ghd.com <Alan.Brandon@ghd.com>
Sent: Wednesday, July 25, 2018 2:34 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; cctofiling@croworld.com
Subject: RE: 11135250-01 2C-14-3 10" (1RP-4583) updated Remediation Summary Report ~COR-11135250-01~

Olivia,

TP-20 and TP-23 were collected at a depth of 8 ft. bgs. in the bottom of the excavation. This area will be backfilled to 4 ft. and lined along with the rest of the excavation. The excavation ranges from 4ft. to 8 ft. bgs in depth. TP-28 and TP-29 were collected from the sidewalls at a depth of 1.5 ft. bgs and the Chevron line to the west prevents further excavation in that direction. There is a former pit to the east, so we did not excavate in that direction. Please let me know if you need additional information.

Thanks

From: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Sent: Wednesday, July 25, 2018 2:00 PM
To: Alan Brandon <Alan.Brandon@ghd.com>; Tucker, Shelly <stucker@blm.gov>; Yolanda Jimenez <yjimenez@blm.gov>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; cctofiling@croworld.com
Subject: RE: 11135250-01 2C-14-3 10" (1RP-4583) updated Remediation Summary Report ~COR-11135250-01~

Mr. Brandon:

Pardon for missing your call today. Please note that 1RP-4583 is not on State surface. NMOCD database indicates Fee surface and Federal minerals. Please contact BLM whether like approval is required for this pipeline release.

As mentioned during our phone conversation on July 6, 2018 at 7:10 am MST, please answer the below questions and/or submit a scaled map addressing these concerns for written documentation of backfill approval.

Thank you for your follow-up,

Olivia

From: Yu, Olivia, EMNRD

Sent: Wednesday, June 27, 2018 4:41 PM

To: Alan.Brandon@ghd.com

Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; cctofiling@croworld.com

Subject: RE: 11135250-01 2C-14-3 10" (1RP-4583) updated Remediation Summary Report ~COR-11135250-01~

Mr. Brandon:

Several concerns regarding the remediation report for 1RP-4583:

- Do the samples collected on February 14 and 25, 2018 represent bottom and sidewall confirmation samples? If so, areas represented by TP-20 and TP-23 still exceed permissible chloride levels at 8 ft. bgs. TP-28 and TP-29 samples at 1.5 ft. bgs are slightly above permissible chloride levels.
- Were other bottom and sidewall samples taken?
- Will the entire excavation area be lined? As written, there are varying depths of excavation within the current release area depending on the sample data (1.5 ft to 6 ft. bgs). Or will the current base be backfilled up to 4 ft. bgs even, before properly setting in a liner, and subsequent backfilling to surface grade?

Thanks,

Olivia

From: Alan.Brandon@ghd.com <Alan.Brandon@ghd.com>
Sent: Tuesday, June 5, 2018 10:31 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; cctofiling@croworld.com
Subject: 11135250-01 2C-14-3 10" (1RP-4583) updated Remediation Summary Report
~COR-11135250-01~

Olivia,

On behalf of ETC, GHD is submitting this updated Remediation Summary report for the above referenced site for your review. Please let us know if you have any questions.

Thank you

Alan Brandon

Senior Project Manager

GHD

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