

Leking, Geoffrey R, EMNRD

From: Joel Lowry <jwlowry@basinenv.com>
Sent: Monday, October 22, 2012 10:59 AM
To: Leking, Geoffrey R, EMNRD
Subject: Fw: Trunk "O" #3 Historical Release (RP-1509) - Permission to Backfill
Attachments: Attachments.pdf; AnalyticalsReports(Condensed).pdf

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OCT 22 2012

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-----Original Message-----

From: Joel Lowry
To: Leking, Geoffrey R, EMNRD
Cc: Rose Slade
Subject: Trunk "O" #3 Historical Release (RP-1509) - Permission to Backfill
Sent: Oct 10 '12 9:35am

approved
Geoffrey Leking
Environmental Specialist
NMOCD-DIST 1 10126112

Mr. Leking,

This email has been prepared in regard to the Trunk "O" #3 (RP-1509) Historical release site. The release site is located on property owned by the Mathew Casey; the depth to groundwater is approximately 150' bgs.

The release was discovered July 7, 2007 and reported to the NMOCD August 2, 2007. The initial C-141 indicated approximately 50 bbls of fluid was released, impacting approximately 5,100 sq. ft. of pasture land and 3,672 sq. ft. of caliche lease road.

On September 10, 2012, Basin Environmental responded to the release site and excavated the impacted medium. The excavation floor and sidewalls were advanced until field tests indicated concentrations of chloride, BTEX and TPH were below NMOCD regulatory remediation action levels established for the site. Excavated material was stockpiled on-site pending final disposition.

On September 14, 2012, Basin collected fifteen (15) confirmation soil samples from the excavation floor and sidewalls for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated BTEX constituent concentrations were less than the appropriate laboratory method detection limit (MDL) in each of the submitted soil samples. Analytical results indicated TPH concentrations were below NMOCD regulatory remediation action levels in each of the submitted soil samples. Analytical results indicated chloride concentrations were below NMOCD regulatory remediation action levels in each of the submitted soil samples, with the exception of soil sample "A Floor", which had a chloride concentration of 1,800 mg/Kg.

In addition, two (2) composite soil samples (A Stockpile and B Stockpile) were collected from the on-site stockpiled material for analysis of BTEX, TPH and chloride concentrations. Analytical results indicated BTEX concentrations were less than the laboratory MDL. TPH concentrations ranged from 1,138.2 mg/Kg for soil sample A Stockpile to 292 mg/Kg for soil sample B Stockpile. Chloride concentrations ranged from 229 mg/Kg for soil sample "A Stockpile" to 80.3 mg/Kg for soil sample "B Stockpile".

On October 1, 2012, the floor of "Excavation A" was advanced an additional foot. One (1) soil sample (A Floor @ 4') was collected from the floor of "Excavation A" and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated the chloride concentration within the newly advanced floor was 477 mg/Kg. Based on laboratory analytical reports, it was determined that the floor of the excavation had been sufficiently advanced, but further delineation was necessary. Material generated from the

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advancement of the floor of "Excavation A" was blended with the existing stockpiled material. One five-point composite stockpile soil sample was collected and field screened for concentrations of chloride. Field test indicated the chloride concentration was less than 250 mg/Kg.

On October 3, 2012, the Southeast corner of "Excavation A" was advanced an additional foot. One soil sample (A Floor @ 5') was collected and submitted to the laboratory for analysis of chloride concentrations. Laboratory analytical results indicated the chloride concentration was 10.0 mg/Kg. Based on laboratory analytical reports, it was determined that vertical delineation had been achieved.

With your permission, Southern Union would like to backfill the excavation with the on-site stockpiled soil. On completion, Southern Union will submit a "Remediation Summary & Site Closure Request" to the NMOCD and the landowner, documenting remediation activities and results from confirmation soil samples.

For your convenience, a site/sample location map, soil chemistry table and laboratory analytical results are attached.

Respectfully,

Joel Lowry

PS. This is a forward of the message I sent the week before last. We discussed this release site during our meeting on October 18, 2012. You may have physical copies of all of the attached information. I was just going to see if you had a chance to review the data and whether or not we can proceed with backfilling the location. Thanks Geoff.