Bratcher, Mike, EMNRD

From: Chase Settle <CSettle@yatespetroleum.com>
Sent: Tuesday, June 07, 2016 1:38 PM
To: Bratcher, Mike, EMNRD
Cc: Katie Parker; Bob Asher; Amber Griffin
Subject: North Dagger Draw Water Station
Attachments: Rpt_1605565_Final_v1.pdf; North Dagger Draw Water Station Sample Sketch.pdf

North Dagger Draw Water Station
Section 20, T19S-R25E
Eddy County, New Mexico

Mr. Bratcher,

The release that occurred at the North Dagger Draw Water Station on April 7, 2016, has unearthed historical issues to combine with current impaction at this location as evidenced by the sample results attached with this email considering how hard and compact with ground was, as well as approximately one foot of impacted soil removed prior to sampling. The release consisted of 100 B/O with 94 B/O recovered within the tank battery berm. The release affected the areas immediately around and between the tanks. The tanks referred to in the impacted area are 1000 bbl tanks constructed of fiberglass. This tight area between the tanks, as well as the underground transfer lines and electrical lines, have rendered sampling using heavy equipment to be impossible due to safety reasons. These same hazards and safety issues also limit the quantity of soil that may be excavated at this location. Unfortunately it is impracticable to shut down this transfer station and remove the tanks because it would cause more releases at the conjoined Salt Water Disposals in this system, as well as placing tremendous pressure on the transfer lines incorporated with the North Dagger Draw Water Station, which could possibly cause more releases in pasture circumstances rather than bermed locations.

With the number of underground transfer and equalizing lines, it would also be impracticable to install a liner at this battery. A liner would not allow any releases that could occur from these lines to be identified quickly enough to perform proper emergency clean up actions, leading to further contamination with a much greater detrimental impact.

Yates Petroleum Corporation proposes to perform mitigation activities while leaving the RP open until the time of abandonment, when full delineation and remediation can be accomplished safely. YPC will excavate as much soil as safely possible, up to one additional foot so as not to impede the balance of the tanks and cause a catastrophe, within the release area between/around the tanks. This soil will be placed on plastic with a berm constructed to prevent any runoff due to rain events. Once stockpiled on plastic, YPC will remediate this soil using a 3% MicroBlaze solution and 13-13-13 fertilizer, alternating monthly between the 2 treatments, until the soil has tested below RRALs for TPH and BTEX with a site ranking zero (0). YPC also proposes to treat the impacted area between/around the tanks that is exposed by the excavation with a 3% MicroBlaze solution and 13-13-13 fertilizer, alternating monthly between the 2 treatments. This treatment will continue until the excavated soils have been fully remediated below RRALs, at which point the excavation will be backfilled with the remediated soils.

Thank you,

Chase Settle, M.S.
Environmental Representative
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