

Bratcher, Mike, EMNRD

From: Weaver, Crystal, EMNRD
Sent: Wednesday, August 30, 2017 11:45 AM
To: Baker, Larry
Cc: Bratcher, Mike, EMNRD; Stan Mickle; Jacob.Mickle@rxsoil.solutions; 'Groves, Amber'; stucker@blm.gov
Subject: FW: 2RP-3572 Work Plan - RXSoil
Attachments: Corrective Action Work Plan - EAU2.0 (2).pdf

Apache Corp. * EAU Emulsion Line (near the EAU M-141) 32.76805277, -104.251166 * 30-015-22834 * 2RP-3572

Bruce,

At this time no further work plan/remediation proposals will be entertained until a full delineation (laboratory tested in 1' increments *aside from additional 10' portion mentioned below*) has been presented.

Sample data that OCD had to reference from a previous contractor's work plan, for this release, is now over a year old and is thus considered non-representative. Resampling of all sample points plus additional samples are required. OCD does not recognize what has been stated as a "clay barrier" to be an impenetrable layer. Delineation of chloride impact to 600 mg/kg for vertical and horizontal delineation with an additional 10' (vertical, in 5' increments) is requested to show chloride levels remain less than 600mg/kg for that lower 10' – this delineation will occur at S-1, S-2 and S-3. An additional sampling point needs to be implemented in between S-2 and S-3 and another one in between S-3 and S-4. At this time all other sample points will not require the additional 10' to verify clean but they will require that you show results of chlorides as 600mg/kg or less. Delineation and sampling will require the following constituents be sampled for and laboratory tested until they meet RRALs for this project: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆) and for chloride by Method 300. Please break benzene out from your BTEX data and make a separate column for it alone on your analytical table(s).

OCD notes that it was mentioned on a previous work plan/remediation proposal done by Arcadis that this release has a point of release originating on BLM administered surface however it migrates across a PLSS line and thus encroaches onto State Land Office administered surface (OCD also double checked this information using OCD internal data, however, surface administrators please correct this information if it is inaccurate). Therefore both surface administrators were included in this email and are expected to be included throughout this project moving forward.

Last but not least, in previous work plans both Apache and Arcadis assessed this project with a site ranking of 0 based on data that was referenced/available at the time. However, OCD has done their own internal assessment based on current ground water & surface water data along with site specific conditions and has thus determined that a site ranking of 10 will be required for this release location. Therefore, just to be clear, that makes RRALs for this project as such: Benzene 10ppm or less, Total BTEX 50ppm or less, and TPH extended range (GRO+DRO+MRO; C₆ thru C₃₆) 1000ppm or less.

If you have any questions or concerns please contact myself or Mike Bratcher here at the District II Office in Artesia.

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
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Artesia, NM 88210
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Fax: 575-748-9720

From: Jacob Mickle [mailto:jacob.mickle@rxsoil.solutions]

Sent: Tuesday, August 22, 2017 3:34 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Baker, Larry' <Larry.Baker@apachecorp.com>; 'Stan' <stan.mickle@rxsoil.solutions>

Subject: 2RP-3572 Work Plan - RXSoil

Hello Mr. Bratcher,

RXSoil would like to submit this Work Plan for approval on the 2RP-3572 EAU Emulsion Line. Thank you for your time.

Bests,

Jacob Mickle I Remediation Field Specialist I RXSoil, Inc.

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Cell: 210-853-7645

[Jacob.mickle@rxsoil.solutions](mailto:jacob.mickle@rxsoil.solutions)