

Bratcher, Mike, EMNRD

From: Bratcher, Mike, EMNRD
Sent: Wednesday, March 29, 2017 3:25 PM
To: 'Aaron Pachlhofer'; Weaver, Crystal, EMNRD; stucker@blm.gov
Subject: RE: Fasken El Paso Federal No. 12
Attachments: COA for FASKEN.pdf

RE: Fasken Oil & Ranch * El Paso Fed 12 * **2RP-4155** * DOR: 3/25/17

Aaron,

As we discussed, attached are the Conditions of Approval for your C-141. At this time, your proposal for removal of impacted material is considered immediate response action, and is approved by OCD. Based on current OCD spill guidelines, I believe this site will have a ranking of 10 points. I will include a link to the spill guideline document if you want to take a look at it, and if you don't agree with this ranking, we can discuss that. I based it on ground water possibly being encountered between 50' – 100', but I just did a quick look. If you can provide data indicating groundwater greater than 100', we can adjust the site ranking. With a site ranking of 10, remediation goal for TPH will be 1000 mg/kg. This will be for soils left in place as well as for reuse of the soil proposed for bioremediation. I will attempt to come out to the site tomorrow, but will call if I can't make it.

This being a Federal site, like approval by BLM will be required for your proposal.

Here is the link for OCD spill guidance: http://www.emnrd.state.nm.us/OCD/documents/7C_spill1.pdf

If you have any questions or concerns, let me know.

Thanks,

Mike Bratcher
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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.

<end>

From: Aaron Pachlhofer [<mailto:aaronp@forl.com>]
Sent: Tuesday, March 28, 2017 2:57 PM
To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; stucker@blm.gov
Subject: Fasken El Paso Federal No. 12

Crystal, Mike, and Shelley,

Please find attached the C-141 for the spill/oil theft that occurred this past Saturday, 3/25/17.

As noted on the C-141, there is a very small affected area inside of the firewall with a 'streak' going over the firewall and onto the pad area. Please see attached photos.

My plan at this time is to remove the affected soils from inside the firewall and also the berm and pad area. Since this is an active tank battery, affected soils will be removed to the maximum practicable extent so that the tanks are not undermined. The goal for affected soil on the berm on the pad is total removal.

Following removal, the removed soil will be stockpiled on plastic sheeting and allowed to naturally attenuate. Once the oil has attenuated, our personnel will reuse the soil to reinforce the firewall.

If you have any questions or comments, please let me know, I have a crew beginning work about 9:00 a.m. on 3/30/17. I expect that work will require less than one day.

Finally, I plan to collect one sample inside the firewall and one outside the firewall. It would be great if OCD or BLM was present on Thursday to discuss sample locations.

Thanks,



Aaron Pachlhofer, P.G.
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