

Bratcher, Mike, EMNRD

From: Tucker, Shelly <stucker@blm.gov>
Sent: Monday, March 5, 2018 11:16 AM
To: Stanley, Curtis D.
Cc: Bratcher, Mike, EMNRD; Camille J Bryant; Nikki A Green; algroves@paalp.com
Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

BLM accepts your request as written.

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

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

575.234.5905 - Direct
575.361.0084 - Cellular
575.234.6235 - Emergency Spill Number

stucker@blm.gov

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 that the location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until the contaminant issues 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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On Thu, Feb 1, 2018 at 7:42 AM, Stanley, Curtis D. <CDStanley@trcsolutions.com> wrote:

Mike/Shelly,

On October 11, 2017, Plains received NMOCD and BLM approval to backfill the area identified as "Stage 3A Excavation Area" with locally obtained non-impacted material. Please reference the attached Site Details & Confirmation Soil Sample Locations Map (Figure 2) for the location of the area. Following the completion of the backfilling activities in the Stage 3A Excavation Area and due to the presence of an electrical generator, diesel fuel tank and other associated equipment in the Stage 3B Excavation Area, excavation activities commenced in the Stage 4A Excavation Area (Figure

2), pending the removal of equipment in the “Stage 3B Excavation Area”. A copy of the initial NMOCD C-141 is attached for your reference.

The “Stage 4A Excavation Area” was initially excavated to a depth of approximately seven (7) feet below ground surface (bgs). On October 25, 2017, following the excavation activities, an excavation floor sample (Floor 7 @ 7') was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene and BTEX concentrations were less than the laboratory method detection limit (MDL), the TPH concentration was 393 mg/Kg, and the chloride concentration was 200 mg/Kg. On October 25 and November 16, 2017, four (4) sidewall soil samples (NSW-2 @ 6', ESW-4 @ 6', SSW-4 @ 6', and WSW-5 @ 7') were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil sample NSW-2 @ 6' to 436.0 mg/Kg for soil sample WSW-5 @ 7'. Chloride concentrations ranged from 40.5 mg/Kg for soil sample NSW-2 @ 6' to 466 for soil sample ESW-4 @ 6'. Please reference Table 1 for Concentrations of BTEX, TPH, and Chloride in Soil.

Based on the analytical results additional excavation was warranted in the area represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6'. Soil sample WSW-5 @ 7', which exhibited a TPH concentration of 436.0 mg/Kg could not be horizontally excavated to the west due to the presence of discharge piping associated with the transfer pump. On November 16, 2017, following additional excavation in the areas represented by soil samples Floor-7 @ 7', SSW-4 @ 6', and ESW-4 @ 6', soil samples Floor-7A @ 8', SSW-4A @ 7' and ESW-4A @ 7' were collected and submitted to the laboratory. The analytical results indicated the three (3) collected soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the applicable laboratory MDL for soil samples ESW-4A @ 7' and Floor-7A @ 8' to 118.0 mg/Kg for soil sample SSW-4A @ 7'. Chloride concentrations ranged from 26.6 mg/Kg for soil sample ESW-4A @ 7' to 412 mg/Kg for soil sample SSW-4A @ 7'. On November 29, 2017, an additional soil sample WSW-5 @ 8' was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentration were less than the laboratory MDL, the TPH concentration was 348.6 mg/Kg and the chloride concentration was 343 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the “Stage 4A Excavation Area” with locally obtained non-impacted material. Plains requests NMOCD and BLM approval to leave in-situ the soil beneath the transfer pump discharge piping represented by soil samples WSW-5 @ 7' and WSW-5 @ 8'. The impacted soil beneath the discharge piping will be remediated at the time of abandonment (ATOA) of the pipeline.

On October 25, 2017, following additional excavation in the area identified as Floor-3 (located adjacent to the northwest corner of the Concho lined secondary containment) a floor soil sample (Floor-3A @ 3.5') was collected and submitted to the laboratory for analysis. The analytical results indicated benzene and BTEX concentrations were less than the laboratory MDL. The TPH concentration was 54.5 mg/Kg and the chloride concentration was 159 mg/Kg.

Based on the analytical results, Plains requests NMOCD and BLM approval to backfill the area north of the Concho lined secondary containment with locally obtained non-impacted material.

The “Stage 3B Excavation Area” was excavated to a depth of approximately ten (10) feet bgs. On November 16 and 17, 2017, following the excavation activities, an excavation floor sample (Floor-8 @ 10’) was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the laboratory MDL and the chloride concentration was 93.8 mg/Kg. In addition, three (3) sidewall soil samples (SSW-5 @ 9’, ESW-5 @ 9’, and NSW-3 @ 9’) were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene and BTEX concentrations less than the applicable laboratory MDL, TPH concentrations ranged from less than the laboratory MDL for soil samples SSW-5 @ 9’ and ESW-5 @ 9’ to 258.90 mg/Kg for soil sample NSW-3 @ 9’. Chloride concentrations ranged from 41.1 mg/Kg for soil sample NSW-3 @ 9’ to 94.3 for soil sample ESW-5 @ 9’.

Based on the analytical results additional excavation was warranted in the area represented by soil sample NSW-3 @ 9’. On November 30, 2017, following additional excavation in the area represented by soil sample NSW-3 @ 9’, soil sample NSW-3A @ 9’ was collected and submitted to the laboratory. The analytical results indicated benzene, BTEX, and TPH concentrations were less than the applicable laboratory MDL and the chloride concentration was 61.4 mg/Kg. Based on the analytical results, Plains requests NMOC and BLM approval to backfill the “Stage 3B Excavation Area” with locally obtained non-impacted material.

The “Stage 4B Excavation Area” was excavated to a depth of approximately eight (8) feet bgs. On November 29, 2017, following the excavation activities, an excavation floor sample (Floor-9 @ 8’) was collected and submitted to the laboratory for analysis of concentrations of BTEX, TPH, and chloride. The analytical results indicated the benzene concentration was less than the laboratory MDL and the BTEX concentrations was 0.06997 mg/Kg. The TPH concentration was 4,565.0 mg/Kg and the chloride concentration was 265 mg/Kg. In addition, four (4) sidewall soil samples (NSW-4 @ 7’, SSW-6 @ 7’, ESW-6 @ 7’ and WSW-6 @ 7’) were collected and submitted to the laboratory and analyzed as above. The sidewall soil samples exhibited benzene concentrations ranging from less than the laboratory MDL for soil samples NSW-4 @ 7’, SSW-6 @ 7’, and WSW-6 @ 7’ to 0.0138 mg/Kg for soil sample ESW-6 @ 7’. BTEX concentrations ranged from less than the laboratory MDL for soil samples SSW-6 @ 7’ and WSW-6 @ 7’ to 0.07129 mg/Kg for soil sample NSW-4 @ 7’. TPH concentrations ranged from 66.1 mg/Kg for soil sample SSW-6 @ 7’ to 10,980.0 mg/Kg for soil sample NSW-4 @ 7’. Chloride concentrations ranged from 29.2 mg/Kg for soil sample SSW-6 @ 7’ to 364 mg/Kg for soil sample ESW-6 @ 7’.

The “Stage 4B Excavation Area” consists of the soils and gypsum adjacent to the Plains crude oil discharge pipeline. Due to the shallow depth of gypsum at the Release Site, a trench measuring approximately sixteen (16) inches in depth and width was cut into the gypsum during the installation of the pipeline. The trench cut into the gypsum layer has provided a preferential pathway for the released liquids. Excavation of the hydrocarbon hard gypsum layer requires the utilization of a hammerhoe, which could constitute an environmental and safety hazard if employed near the pipeline. Due to these circumstances, Plains requests NMOC and BLM approval to leave in-situ the soil represented by the Stage 4B Excavation Area soil samples. The soil beneath the discharge piping will be remediated ATOA of the pipeline.

As previously discussed, impact beneath the Concho lined secondary containment will be remediated at the time of abandonment of the facility.

As requested by the NMOCD and BLM, a monitor well will be installed on-site following the completion of the backfilling activities. Please see Figure 2 for the location of the monitor well.

If you have any questions or concerns please contact me or Camille Bryant at 575-441-1099.

Respectfully submitted on behalf of Plains Marketing, L.P.,

Curt D. Stanley
Senior Project Manager

Please note our address and phone numbers have changed.



10 Desta Drive, Suite 150E, Midland, TX 79705

T: 432.520.7720 | C: 432.559.3296 | D: 432.294.5193

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From: Shelly Tucker [mailto:stucker@blm.gov]

Sent: Wednesday, October 11, 2017 7:38 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: Re: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Curt,

BLM concurs with NMCOD approval to backfill the area identified as "Stage 3A Excavation Area".

I apologize for the tardiness of this email. I was thinking I had already approved it.

Shelly J Tucker

BLM-Carlsbad

EPS - Spill/Release Coordinator

575-234-5905

575-361-0084

stucker@blm.gov

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Stanley, Curtis D." <CDStanley@trcsolutions.com>

Date: 10/11/17 11:26 AM (GMT-07:00)

To: "Bratcher, Mike, EMNRD" <mike.bratcher@state.nm.us>, "Tucker, Shelly" <stucker@blm.gov>, "Weaver, Crystal, EMNRD" <Crystal.Weaver@state.nm.us>

Cc: Camille J Bryant <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Thank you Mike,

We will wait for BLM approval before backfilling.

Curt

From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]

Sent: Wednesday, October 11, 2017 12:21 PM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD approves your proposal to backfill the area identified as "Stage 3A Excavation Area". BLM approval required as well.

Thank you,

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

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.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]

Sent: Thursday, October 5, 2017 7:42 AM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Mike / Shelly,

On September 11, 2017, BLM approved the backfilling of the west side of the Plains - Alpha Gathering Seg 3 Lat 6E Release Site excavation (Stage 2 Excavation Area) and NMOCD concurred on September 14, 2017. Following the backfilling of the Stage 2 Excavation Area with non-impacted caliche, excavation efforts were directed to the north side of the Release Site (Stage 3 Excavation Area). Please reference the attached Site Details and Confirmation Soil Sample Location Map. Due to the approaching adverse weather, three (3) soil samples (WSW-4 @ 8', NSW-1 @ 7', and Floor-6 @ 9') were collected from the west side of the Stage 3 Excavation Area on September 21, 2017, which is represented as Stage 3A on the attached Site Details & Confirmation Soil Sample Locations Map.

The analytical results indicated benzene and BTEX concentrations were less than the Method Detection Limit (MDL) for all three (3) soil samples. TPH concentrations ranged from less than the applicable laboratory MDL for soil samples WSW-4 @ 8' and NSW-1 @ 7' to 106.5 mg/Kg for Floor-6 @ 9'. Chloride concentrations ranged from 20.7 mg/Kg for soil sample Floor-6 @ 9' to 29.3 mg/Kg for soil sample NSW-1 @ 7'. Please reference the attached "Concentrations of BTEX, TPH and Chloride in Soil" Table.

Based on the analytical results, all contaminants of concern were less than the NMOCD regulatory guidelines, with the exception of soil sample Floor-6 @ 9', which exhibited a TPH concentration of 106.5 mg/Kg and slightly exceeded the NMOCD guideline of 100 mg/Kg.

TRC, on behalf of Plains, requests NMOCD and BLM approval to leave in situ the soil represented by soil sample Floor-6 @ 9' and backfill the west end (Stage 3A Excavation Area) of the Stage 3 Excavation Area.

On NMOCD and BLM approval, when the area dries out, the subject area will be backfilled with non-impacted caliche. Following the backfilling of the subject area, excavation will continue on the east end (Stage 3B Excavation Area) of the Stage 3 Excavation Area.

On completion of the excavation in the Stage 3B Excavation Area, soil samples will be collected and submitted to the laboratory. On receipt of the analytical results, TRC, on behalf of Plains will request NMOCD and BLM permission to backfill the Stage 3B Excavation Area. Following the backfilling of the Stage 3B Excavation Area excavation of the south side of the Release Site (Stage 4 Excavation Area) will commence.

Following the completion of all excavation and backfilling activities, a monitor well will be installed as requested by the BLM and NMOCD.

Thank you for your consideration,

Curt D. Stanley
Senior Project Manager



2057 Commerce, Midland, TX 79703

T: 432.520.7720 | F: 432.520.7701 | C: 432.559.3296

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From: Bratcher, Mike, EMNRD [<mailto:mike.bratcher@state.nm.us>]

Sent: Thursday, September 14, 2017 10:18 AM

To: Stanley, Curtis D. <CDStanley@trcsolutions.com>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: 'Camille J Bryant' <CJBryant@paalp.com>

Subject: RE: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

RE: Plains Marketing * **2RP-4147**

Curt,

OCD concurs with BLM approval for your request to backfill as specified.

Mike Bratcher

NMOCD District 2

[811 South First Street](#)

[Artesia, NM 88210](#)

[575](#)-748-1283 Ext 108

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.

From: Stanley, Curtis D. [<mailto:CDStanley@trcsolutions.com>]
Sent: Tuesday, September 5, 2017 8:40 AM
To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Tucker, Shelly <stucker@blm.gov>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>
Cc: 'Camille J Bryant' <CJBryant@paalp.com>
Subject: Plains - Alpha Gathering Seg 3 Lat 6E (2RP-4147)

Plains - Alpha Gathering Seg 3 Lat 6E

2RP-4147

32.039556° 104.232184°

ULT K, Section 18, Township 26 South, Range 27 East NMPM

Lea County, New Mexico

Good Morning,

On June 29, 2017, Representatives of the New Mexico Oil Conservation Division (NMOCD), Bureau of Land Management (BLM), Plains Marketing, LP (Plains), and TRC Environmental Corp. (TRC) met in the NMOCD Artesia Office.

During the meeting, Plains requested and received approval from the NMOCD and BLM to backfill the existing excavation and reinstall the Plains LACT Unit, pumps and associated piping at the Plains Alpha Gathering Seg 3 Lat 6E. Plains requested approval to backfill the excavation due to safety and crude oil transportation logistics concerns associated with the Concho Screech Owl CTB Facility.

From July 7, 2017 through July 18, 2017, the existing excavation was backfilled with locally purchased non-impacted caliche. Following the backfilling of the existing excavation the equipment described above was reinstalled and placed in service.

On August 15, 2017, excavation from the west edge of the backfilled area commenced and continued to the western extent of impact (Stage 2 Excavation Area). Please reference Figure 2 for Site Details and Confirmation Soil Sample Locations Map.

On August 16, 2017, two (2) excavation floor soil samples (Floor-4 @ 8' and Floor-5 @ 9') were collected and submitted to the laboratory for determination of concentrations of BTEX, TPH, and chloride. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 113 mg/Kg for soil sample Floor-4 @ 8' to 232 mg/Kg for soil sample Floor-5 @ 9'.

In addition, three (3) soil samples (WSW-2 @ 7', WSW-3 @ 8', and SSW-3 @ 7') were collected from the sidewalls of the excavation. The analytical results indicate benzene, BTEX, and TPH concentrations were less than the applicable laboratory reporting limit (RL). Chloride concentrations ranged from 117 mg/Kg for soil sample SSW-3 @ 7' to 328 mg/Kg for soil sample WSW-3 @ 8'.

Based on the analytical results, all concentrations of BTEX, TPH, and Chloride were less than the NMOCD regulatory guidelines, with the exception of soil samples WSW-2 @ 7' (280 mg/Kg) and WSW-3 @ 8' (328 mg/Kg), which exhibited chloride concentrations above 250 mg/Kg.

Based on the analytical results and with NMOCD and BLM approval, Plains requests approval to leave in situ the chloride concentrations represented by soil samples WSW-2 @ 7' and WSW-3 @ 8' and backfill the area referred to as Stage 2 Excavation Area. On NMOCD and BLM backfilling approval, Plains will commence delineating and excavating the area to the north of the Release (Stage 3 Excavation Area). The area to the south of the Release (Stage 4 Excavation Area) will be excavated after the excavation and backfilling of the Stage 3 Excavation Area.

If you have any questions or concerns, Please contact me or Camille Bryant (Plains) at 575-441-1099.

Respectfully,

Curt D. Stanley
Senior Project Manager



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