

## Bratcher, Mike, EMNRD

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**From:** Gregston, Terry <tgregsto@blm.gov>  
**Sent:** Wednesday, July 11, 2018 10:54 AM  
**To:** Melodie Sanjari; Bratcher, Mike, EMNRD; Austin Weyant; John Turner  
**Subject:** Re: [EXTERNAL] FW: SCB 5B to Candelario 4" Polyline EMR Remediation Report

A conference call with Austin Weyant, SMA, was required to clarify portions of the submitted plan prior to approval. The following notes from that conversation are added to the case file as part of the submitted plan and approval stipulations:

SMA sampled the site down to the point of refusal at the conglomerate bedrock that underlies the release location. The conglomerate bedrock forms a sheet that holds the south bank of the low water crossing of the Pecos River in place. Significant damage to the bedrock in this area could destabilize the low water crossing and endanger the low water crossing bridge in flood events. SMA has removed contaminated soil above the conglomerate bedrock plain and has taken measures to not damage the underlying conglomerate rock. During initial cleanup, soil was sampled and removed from above the bedrock. SMA is assuming that the underlying bedrock is as contaminated as the soil that has been removed; therefore, the removed soil contaminant level is assumed to be approximate to what is left in place in the underlying bedrock. Hence, the appearance of "excavated" contaminant levels in the cleanup plan as an indicator of the contaminants still remaining in the underlying bedrock. After powerwashing the exposed bedrock in order to drop the contaminant levels of the bedrock, SMA will saw out samples of the bed rock for analysis prior to final closure approval.

With the preceding plan clarifications documented and included as part of the work plan, the work plan submitted for the SCB 5B to Candelario 4" Polyline, federal tracking number 18TG01UE, is approved the following stipulations:

1. Like approval is required from the OCD.
2. Notify Terry Gregston, (575) 361-2635, prior to moving equipment onto the location to begin cleanup operations. In this case, the BLM needs to observe powerwashing activities as they are in progress.
3. Notify Terry Gregston, (575) 361-2635 in the event that you encounter excavation difficulties, unexpected void areas, or archeological artifacts. An onsite may be required to assess the situation.
4. **The BLM will wish to inspect the excavations once cleanup depth is reached.** Confirmation samples of the excavated area will be required; the BLM will witness the sampling. Contact Terry Gregston, (575) 361-2635 to schedule the sampling onsite at a mutually agreeable time.
5. Once confirmation samples are analyzed at a third party lab, the lab analysis must be forwarded to Terry Gregston at [tgregsto@blm.gov](mailto:tgregsto@blm.gov) for final review and approval before backfilling the excavation.
6. Once BLM approval of the final closure level is received, the excavation can be backfilled with clean soil. NOTE: Only clean soils can be used for backfill; soils from landfarm or land disposal facilities will not be accepted as backfill material. Additionally, blending of contaminated soils with clean soils to reach closure levels is not permitted. Clean caliche can be used to backfill part of the excavation but clean topsoil must be used for at least the top 3 feet. Topsoil utilized should be similar to that found in surrounding native pastures.

7. Install erosion control measures (berms, burlap sandbag rows, etc.) to prevent the unconsolidated soils from washing or blowing away prior to vegetation establishment. In this case due to steep slopes in some areas, burlap sandbags may be a good option; sand bags must be arsenic free. Seed with a combination BLM seed mix #1 with DWS Four-wing saltbush (*Atriplex canescens*) 5.0 lb/acre and Plains bristlegrass (*Setaria macrostachya*) 2.0 lb/acre added.
8. When the site work is finished and prior to removing equipment from the location, notify Terry Gregston, (575) 361-2635 to conduct the final surface inspection.
9. Continue to monitor spill reclamation area to ensure impacted pasture areas revegetate and that erosion issues do not develop.

**BLM approval of this proposal 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 location does not revegetate, or future issues with contaminants are encountered, the operator will be asked to address the issues until 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.**

**Terry Gregston**  
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On Wed, Jul 4, 2018 at 8:59 AM, Melodie Sanjari <[melodie.sanjari@soudermiller.com](mailto:melodie.sanjari@soudermiller.com)> wrote:

My apologies for the email typo.

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**From:** Melodie Sanjari  
**Sent:** Wednesday, July 4, 2018 8:53 AM  
**To:** [tgregsto@blm.gov](mailto:tgregsto@blm.gov); Bratcher, Mike, EMNRD <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>; Gonzales, Sarah - Carlsbad <[Sarah.Gonzales@mosaicco.com](mailto:Sarah.Gonzales@mosaicco.com)>  
**Cc:** Austin Weyant <[austin.veyant@soudermiller.com](mailto:austin.veyant@soudermiller.com)>; John.Turner@Rockcliffenergy.com  
**Subject:** SCB 5B to Candelario 4" Polyline EMR Remediation Report

Good Morning All,

Please find the attached Remediation Report of the Emergency Response Associated with the SCB 5B to Candelario 4" Polyline (Incident Number nAB1813056113). If there are any questions or concerns please feel free to reach out.

Happy Fourth!

**Melodie Sanjari**

*Staff Scientist*



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