

From: [Hamlet, Robert, EMNRD](#)
To: [Camille J Bryant](#); "[Tucker, Shelly J](#)"; [Bratcher, Mike, EMNRD](#)
Cc: [Karolanne Hudgens](#); "[Joel Lowry](#)"
Subject: RE: [EXTERNAL] FW: Plain's/San Mateo - Astro Dog 6-Inch - Project Update
Date: Thursday, July 7, 2022 11:47:00 AM

Camille,

Please, go ahead and backfill the excavation. The OCD grants approval of the remediation activities at the Astro Dog 6" Line Strike Release Site. A best case effort was put forth to remediate the affected lenses within the hardened rock. Thank you for your efforts.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
575.909.0302 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



From: Camille J Bryant <CJBryant@paalp.com>
Sent: Thursday, July 7, 2022 8:47 AM
To: 'Tucker, Shelly J' <stucker@blm.gov>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Karolanne Hudgens <KHudgens@paalp.com>; 'Joel Lowry' <joel@etechenv.com>
Subject: RE: [EXTERNAL] FW: Plain's/San Mateo - Astro Dog 6-Inch - Project Update

Good morning,

Plains is submitting this follow-up email to address the status of the Astro Dog 6" Line Strike Release Site (NMOCD Incident # nAPP2204733624). As indicated below, the BLM has granted approval of the remediation activities at the Astro Dog 6" Line Strike Release Site, these activities include excavation and transportation off-site of approximately 5,928 cubic yards of crude oil impacted material and application of a 30% hydrogen peroxide solution to an area located directly beneath a high-pressure gas pipeline. These activities were discussed and approved during a meeting in May 2022 with the BLM, NMOCD, Etech and Plains representatives. The area where the hydrogen peroxide solution was applied was the only area which exhibited TPH concentrations above NMOCD regulatory guidelines. This area was saturated with the solution and confirmation soil samples were obtained and submitted for laboratory analysis. The laboratory analytical results indicated a TPH concentration of 386 mg/Kg (please see detailed description of remediation activities below).

Due to safety concerns associated with excavating beneath the high-pressure gas pipeline and the limited area of impact remaining in-situ, Plains respectfully requests NMOCD approval to conduct backfilling activities at the site. On completion of backfilling activities a Remediation Summary and Closure Request along with a Final C-141 will be submitted for approval to the NMOCD and BLM.

Please contact Joel Lowry or myself with any questions or concerns.

Plains appreciates your assistance with regard to this matter.

Respectfully,

Camille J. Bryant
HSE Remediation Supervisor
Plains All American
1106 Griffith Drive
Midland, Texas 79706
Office: 432.221.7924
Cell: 575.441.1099

From: Tucker, Shelly J <stucker@blm.gov>

Sent: Thursday, June 30, 2022 12:06 PM

To: Camille J Bryant <CJBryant@paalp.com>; mike.bratcher@state.nm.us;
robert.hamlet@state.nm.us

Cc: Karolanne Hudgens <KHudgens@paalp.com>; 'Joel Lowry' <joel@etechnv.com>

Subject: Re: [EXTERNAL] FW: Plain's/San Mateo - Astro Dog 6-Inch - Project Update [External]

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Upon review of the information provided, the BLM hereby approves backfilling activities. The BLM acknowledges the impact (which is above NMOCD guidelines) being left in place. Based on the dense subsurface rock, depth and width of the excavation, and estimated volume of impacted material being left in place, the BLM feels Plains has made a good faith effort in removing all impacted material. The BLM feels that further excavation activities could result in elevated safety issues for the contractors on site and potentially for the public driving on US Refinery Rd (due to the fact the excavation is directly next to the roadway).

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Shelly J Tucker

Environmental Protection Specialist
Realty - Compliance

Bureau of Land Management

620 E. Greene St
Carlsbad, NM 88220

575.234.5706 - Direct
575.499.6831 - Mobile

stucker@blm.gov

*Please note a new spill/release email account has been set up. Please forward future email notifications for **spills/releases only** to this central email to ensure if I am unavailable, my supervisor will be able to assist with any questions.*

Spill/Release email: BLM_NM_CFO_REALTY_SPILL@BLM.GOV

From: Camille J Bryant <CJBryant@paalp.com>
Sent: Tuesday, June 14, 2022 7:49 AM
To: mike.bratcher@state.nm.us <mike.bratcher@state.nm.us>; robert.hamlet@state.nm.us <robert.hamlet@state.nm.us>; Tucker, Shelly J <stucker@blm.gov>
Cc: Karolanne Hudgens <KHudgens@paalp.com>; 'Joel Lowry' <joel@etechenv.com>
Subject: [EXTERNAL] FW: Plain's/San Mateo - Astro Dog 6-Inch - Project Update

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Good Morning,

Please see the email below and the attached information packet describing remediation activities conducted at the Astro Dog 6" Line Strike Release Site (NMOCD Incident # nAPP2204733624). At this time Plains respectfully requests approval to conduct backfilling activities at the site. On completion of backfilling activities a Remediation Summary and Closure Request along with a Final C-141 will be submitted for approval to the NMOCD and BLM.

Please contact Joel Lowry or myself with any questions or concerns.

Plains appreciates your assistance with regard to this matter.

Respectfully,

*Camille J. Bryant
HSE Remediation Supervisor
Plains All American
1106 Griffith Drive
Midland, Texas 79706*

Office: 432.221.7924

Cell: 575.441.1099

From: Joel Lowry <joel@etechnv.com>

Sent: Monday, June 13, 2022 4:06 PM

To: Camille J Bryant <CJBryant@paalp.com>; Karolanne Hudgens <KHudgens@paalp.com>

Subject: FW: Plain's/San Mateo - Astro Dog 6-Inch - Project Update [External]

Caution: The email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mrs. Bryant,

Please find attached an information packet that has been prepared for the Plains/San Mateo Astro Dog 6-Inch crude oil release site. On February 14, 2022, a contractor for an unaffiliated pipeline operator inadvertently struck a 6-inch pipeline belonging to Plains while conducting pipelining activities in the area. The release was limited to the open bell hole. On February 14, 2022, Matador/San Mateo reported the release to NMOCD and the incident was assigned NMOCD Incident Number **nAPP2204566669**. On February 16, 2022, Plains prepared its own NOR and C-141 and the release was assigned incident number **nAPP2204733624**. The initial report indicated approximately 12 barrels of crude oil were released. During initial response activities a vacuum truck was utilized to recover approximately 11 barrels of crude oil. Upon completion of Remediation Activities C-141's will be prepared to cover both incidents.

On February 22, 2022, remediation activities commenced at the release site. Impacted material within the release margins was excavated and stockpiled on-site, atop an impermeable liner, pending final disposition at an NMOCD surface waste facility. Upon beginning remediation activities it was determined that a hammer hoe would be required to remove affected material at the release site.

On March 3, 2022, Etech collected six (6) samples (FL-1 @ 14', FL-2 @ 12', ESW #1, ESW #2, NSW #1 and SSW #1) from the floor and sidewalls of the recently excavated area. The collected samples were submitted to an NMOCD-certified laboratory for analysis of BTEX, TPH and/or chloride. Laboratory analytical results indicated BTEX, TPH and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. Excavation of impacted material continued toward the west.

On March 10, 2022, Etech collected six (6) samples (FL-3 @ 14', FL-4 @ 14', FL-5 @ 14.5', FL-6 @ 14.5', NW #2 and SW#2) from the floor and sidewalls of the recently excavated area. Laboratory analytical results indicated BTEX and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. TPH concentrations ranged from less than the laboratory reporting limited in sample SW #2 to 999 mg/kg in sample FL-3 @ 14'. TPH concentrations exceeded the NMOCD Closure Criteria in each of the submitted samples with the exception of sample SW #2. Excavation activities continued toward the west and the floor and sidewalls of the excavated area were advanced in the areas characterized by samples FL-3 @ 14', FL-4 @ 14', FL-5 @ 14.5', FL-6 @ 14.5' and NW #2.

On March 23, 2022, Etech collected six (6) samples (FL-3b @ 16', FL-4b @ 16', FL-5b @ 14', NSW #2b, NSW #3, and SSW #3) from the floor and sidewalls of the recently excavated area. Laboratory analytical results indicated that BTEX and/or chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. TPH concentrations were below the NMOCD Closure Criteria in each of the submitted sampled with the exception of samples FL-4b @ 16' (155 mg/kg), NSW #2b (886 mg/kg) and NSW #3 (341 mg/kg). Impacted material in the area characterized by sample FL-4b @ 16' was removed. Further advancement of the north sidewall in the area characterized by samples NSW #2b and NSW #3 was limited due to safety concerns associated with the continued use of the hammer in such close proximity to an active 16-inch high-pressure gas line binding the Site toward the north.

On March 24, 2022, Etech collected one (1) sample (FL-6b @ 17') from the floor of the recently excavated area. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be less than the laboratory MDL. Excavation activities continued toward the west.

On April 1, 2022, Etech collected one (1) sample (FL-4c @ 17') from the floor of the recently excavated area. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be 93.4 mg/kg. Excavation activities continued toward the west.

On April 8, 2022, Etech advanced an investigative trench (NT) on the north side of the high-pressure gas line in the areas characterized by soil samples NSW #2b and NSW #3. During the advancement of the investigative trench, three (3) soil samples (NT-10', NT-15' and NT-20') were collected and submitted to the laboratory for analysis of BTEX and TPH concentrations which were determined to be below the applicable laboratory MDL in each of the submitted soil samples. Based on laboratory analytical results it was determined that impacts did not migrate horizontally toward the north beyond the high-pressure gas line.

On April 27, 2022, Etech collected three (3) samples (FL-7 @ 16-18', FL-10 @ 18' and SWSW) from the floor and sidewalls of the recently excavated area. The collected soil samples were submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated that BTEX and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. TPH concentrations were below the NMOCD Closure Criteria in each of the submitted samples with the exception of sample SWSW (1,840 mg/kg). Excavation activities continued toward the west and the sidewall of the excavation was advanced in the area characterized by sample SWSW.

On May 10, 2022, Etech collected three (3) samples (FL-5b, FL-8 and FL-9) from the floor of the recently excavated area. The collected soil samples were submitted to the laboratory for analysis of BTEX, TPH and/or chloride. Laboratory analytical results indicated BTEX and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. TPH concentrations ranged from 70.4 mg/kg in sample FL-5b to 1,680 mg/kg in sample FL-8. Excavation activities continued toward the west and the floor of the excavated area was advanced in the areas characterized by samples FL-8 and FL-9.

On May 11, 2022, representatives of Plains, the NMOCD and BLM met to discuss the remediation Site. During the meeting it was determined that the removal of hydrocarbon impacts on the north sidewall beneath the high-pressure gas line posed a significant safety risk and was impracticable. Since the impacted areas were limited to two small porous lenses between 12 and 14 ft. bgs and did not extend toward the north beyond the high-pressure gas line, saturating the affected areas with a 30% hydrogen peroxide solution may be sufficient to mitigate the contaminants.

On May 12, 2022, Etech collected two (2) samples (SWSWb and WSW #1) from sidewalls of the recently excavated area. The collected samples were submitted to the laboratory for analysis of BTEX, TPH and/or chloride concentrations. Laboratory analytical results indicated that BTEX, TPH and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples with the exception of the chloride concentration in soil sample WSW #1 which was determined to be 964 mg/kg. Excavation activities continued toward the west and the sidewall of the excavation was advanced in the area characterized by sample WSW #1.

On May 20, 2022, Etech collected six (6) samples (FL-8b, FL-9b, FL-11, FL-12, WSW #1b and WSW #2) from the floor and sidewalls of the recently excavated area. The collected samples were submitted to the laboratory for analysis of BTEX, TPH and/or chloride. Laboratory analytical results indicated BTEX, TPH and chloride concentrations were below the NMOCD Closure Criteria in each of the submitted samples. In addition, Etech treated the impacted areas on the north sidewall proximate to the high-pressure gas line by saturating it with a 30% hydrogen peroxide solution.

On June 3, 2022, Etech collected one (1) sample (6/3 NSW) from the treated area characterized by soil samples NSW #2b and NSW #3. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be 1,440 mg/kg. Upon collecting the sample, the affected area was saturated with a 30% hydrogen peroxide solution.

On June 6, 2022, Etech collected one (1) sample (6/6 NSW) from the treated area characterized by

soil samples NSW #2b and NSW #3. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be 1,630 mg/kg. Upon collecting the sample, the affected area was saturated with a 30% hydrogen peroxide solution.

On June 8, 2022, Etech collected one (1) sample (6/8 NSW) from the treated area characterized by soil samples NSW #2b and NSW #3. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be 784 mg/kg. Upon collecting the sample, the affected area was saturated with a 30% hydrogen peroxide solution.

On June 9, 2022, Etech collected one (1) sample (6/9 NSW) from the treated area characterized by soil samples NSW #2b and NSW #3. The collected soil sample was submitted to the laboratory for analysis of TPH concentrations which were determined to be 382 mg/kg.

Remediation activities were conducted in accordance with the BLM and NMOCD. During the course of remediation activities approximately 5,928 cubic yards of impacted material was excavated with a hammer hoe and transported to an NMOCD-approved surface waste facility for disposal. Based on laboratory analytical results and remediation activities conducted to date, Etech recommends Plains request permission to backfill the excavated area with locally-sourced, non-impacted material. Upon completion of backfilling activities, a *Remediation Summary and Closure Request* (C-141) will be prepared detailing remediation activities and laboratory analytical results from confirmation soil samples for submission to the NMOCD.

If you have any questions or need any additional information, please feel free to contact me by phone or email. Thanks.

Joel W. Lowry

Etech Environmental & Safety Solutions, Inc.
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Lovington, NM 88260
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Cell: (432) 466-4450

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