Mr. Lowry,

NMSLO approves your backfill request for 1RP-4739

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Monday, January 29, 2018 9:25 AM
To: Lowry, Joel <JLowry@trcsolutions.com>; Naranjo, Mark <MNaranjo@slo.state.nm.us>
Cc: Camille J Bryant <CJBryant@paalp.com>; algroves@paalp.com
Subject: RE: 1RP-4739 - NMOCD Meeting Minutes

Mr. Lowry:

Acknowledged. NMOCD approves of the backfill request for 1RP-4739. Like approval from NMSLO required.

Thanks, Olivia

From: Lowry, Joel [mailto:JLowry@trcsolutions.com]
Sent: Monday, January 29, 2018 9:20 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Camille J Bryant <<u>CJBryant@paalp.com</u>>; <u>algroves@paalp.com</u>
Subject: Re: 1RP-4739 - NMOCD Meeting Minutes

Olivia,

As best I can tell from my cell phone, you are correct. It is FL-2. I apologize for the mistake. Thank you for catching that!

Respectfully,

Joel Lowry

Sent from my iPhone

On Jan 29, 2018, at 9:16 AM, Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>> wrote:

Good morning Mr. Lowry:

RE: backfill request for 1RP-4739.

FL-1, excavated to 10-inches bgs, on August 10, 2017, demonstrate permissible levels of TPH. Do you perhaps mean FL-2 at 6-inches? Although written incorrectly in Table 1 and below, Figure 1 references the correct impacted area.

Please verify that the area to be remediated for TPH at time of abandonment or retrofit is FL-2, along with DS-2.

Thanks, Olivia

From: Lowry, Joel [mailto:JLowry@trcsolutions.com]
Sent: Friday, January 26, 2018 7:57 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Camille J Bryant <<u>CJBryant@paalp.com</u>>; algroves@paalp.com
Subject: 1RP-4739 - NMOCD Meeting Minutes

Ms. Yu,

Please find attached an updated *Site & Sample Location Map* along with an updated *Soil Chemistry Table* that has been prepared for Plains Alpha Crude Lynch Station environmental remediation site. In accordance with the email below, a majority of the excavated area, characterized by confirmation soil samples indicating BTEX, TPH and/or chloride concentration were below the NMOCD RRAL, was backfilled with locally sourced, non-impacted caliche. Excavated areas characterized by soil samples indicating impacted soil affected above the NMOCD RRAL were intentionally left open to facilitate "flooding" with a Micro-Blaze solution.

On November 15, 2017, in accordance with the email below, the affected area characterized by impacted material remaining in-situ, represented by soil samples FL-1 @ 6" (In-Situ) and DS-2 @ 2.5', was treated with a Micro-Blaze solution in an effort to enhance in-situ bioremediation. On December 20, 2017, upon allowing the agreed upon month to pass, the affected area represented by soil samples FL-1 @ 6" (In-Situ) and DS-2 @ 2.5' was resampled. Laboratory analytical results indicate soil samples 12/20 FL-1 @ 6" (In-Situ) and 12/20 DS-2 @ 2.5' exhibited TPH concentrations of 5,742 and 8,140.3 mg/kg, respectively.

Remediation activities were conducted in accordance with the NMOCD. Laboratory analytical results from excavation confirmation soil samples indicate BTEX, TPH and/or chloride concentrations were below the NMOCD RRAL in each of the submitted soil samples with the exception of soil samples FL-1 @ 6" (In-Situ) and DS-2 @ 2.5'. In accordance with the NMOCD, the affected area characterized by soil samples FL-1 @ 6" (In-Situ) and DS-2 @ 2.5' was treated a Micro-Blaze solution in an effort to enhance bio-remediation.

Based on laboratory analytical results and field activities conducted to date, Plains request NMOCD permission to backfill the remainder of the site. Upon completion of remediation activities, Plains will prepare an *Remediation Summary and Risk-Based Soil Closure Report*, detailing remediation activities and laboratory analytical results from confirmation soil samples. Impacted soil remaining in-situ, characterized by soil samples 12/20 FL-1 @ 6" (In-Situ) and 12/20 DS-2 @ 2.5', will be remediated upon abandoning and decommission the facility (TOA). The *Risk-Based Soil Closure Report* will include a scaled map demarcating impacted soil affected above the NMOCD RRAL remaining in-situ for future reference.

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

Respectfully,

Joel Lowry

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Tuesday, October 3, 2017 1:37 PM
To: Lowry, Joel <<u>JLowry@trcsolutions.com</u>>; agroves@slo.state.nm.us
Cc: Camille J Bryant <<u>CJBryant@paalp.com</u>>
Subject: RE: 1RP-4739 - NMOCD Meeting Minutes

Mr. Lowry:

Thank you for the notes regarding subsequent remedial activities for 1RP-4739. NMOCD approves of remediation completed and proposed plan. Please see the attachment for your records.

Olivia

From: Lowry, Joel [mailto:JLowry@trcsolutions.com]
Sent: Friday, September 22, 2017 12:14 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; agroves@slo.state.nm.us
Cc: Camille J Bryant <<u>CJBryant@paalp.com</u>>
Subject: 1RP-4739 - NMOCD Meeting Minutes

Ms. Yu and Ms. Groves,

Please find attached a "Soil Chemistry Table" and "Site and Sample Location Map" that has been prepared for Plains' Alpha Crude Lynch Station release site (1RP-4739). As per our conversation with the NMOCD, and upon receiving NMSLO approval, Plains will begin backfilling the excavated area with locally sourced, non-impacted caliche. Affected areas within the resilient rock layer adjacent to the above-ground pipelines, represented by soil samples FL-2 @ 6", DS-2 @ 1' and DS-2 @ 2.5', will be left open and

treated with a Micro-Blaze solution. Upon treating the affected areas represented by soil samples FL-2 @ 6", DS-2 @ 1' and DS-2 @ 2.5' with Micro-Blaze, additional soil samples will be collected approximately 30 days later and analyzed for concentrations of TPH, results of which will be provided to the NMOCD and NMSLO. Excavated material, currently stockpiled on-site, will be transported to and NMOCD-permitted facility for disposal.

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

Respectfully,

Joel Lowry

Senior Project Manager

<image001.jpg></image001.jpg>	2057 Commerce Drive, Midland, TX 79703 T: 432-520-7720 F: 432-520-7701 C: 432-466-4450
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