Mr. Baker:

NMOCD would appreciate more advance notice to review submitted information since the excavation had been open since December 2017. Given the release location, NMOCD will grant backfill approval for 1RP-4898.

Please inform NMOCD when the soil boring will occur. Locations of the soil bores must be marked with GPS coordinates and provide soil bore logs along with photo documentation of delineation and remediation activities.

Like approval from NMSLO required.

Olivia

From: Yu, Olivia, EMNRD
Sent: Friday, March 9, 2018 8:03 AM
To: 'Baker, Larry' <Larry.Baker@apachecorp.com>
Cc: Naranjo, Mark <MNaranjo@slo.state.nm.us>; Henkhaus, Mark
<Mark.Henkhaus@apachecorp.com>; Carnes, Travis <Travis.Carnes@apachecorp.com>; Cox, Rodney <Rodney.Cox@apachecorp.com>
Subject: RE: 1RP-4898 Proposal

Mr. Baker:

Acknowledged. I was looking for an approval stamp during my cursory review.

Are you sure that 1RP-2130 is not in vicinity of 1RP-4898? The description of the release location on the C-141 for 1RP-2130 and the drawing of the release location indicate the release is in the approximate location of 1RP-4898, despite the lack of a scale, compass, or GPS coordinates. API well 30-025-38508 is just South of 1RP-4898. Moreover, aerial imagery going back to 2009 suggests that excavation work was conducted this region north of 30-025-38508, which matched the outlined impacted area on the figure provided along with the final C-141 for 1RP-2130.

Olivia

From: Baker, Larry [mailto:Larry.Baker@apachecorp.com]
Sent: Thursday, March 8, 2018 4:26 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Cc: Naranjo, Mark <<u>MNaranjo@slo.state.nm.us</u>>; Henkhaus, Mark

<<u>Mark.Henkhaus@apachecorp.com</u>>; Carnes, Travis <<u>Travis.Carnes@apachecorp.com</u>>; Cox, Rodney <<u>Rodney.Cox@apachecorp.com</u>> **Subject:** RE: 1RP-4898 Proposal

Ms. Yu,

Apache Corporation submitted final C-141 and were accepted and signed by NMOCD personal. Could you please clarify why it is NMOCD position that the two RPs are not resolved. The release associated with the present liner was not either of those RPs and I am continuing to look for the release information internally and on the NMOCD web page.

I have attached an updated diagram, lab, and photos for your review. All samples not above the existing liner on the walls are below regulatory guidelines except for North Wall 2 which is 784 Chlorides but is nearest the road and cannot be safely excavated. Walls samples were collect above the liner and still awaiting laboratory results for those samples and will provide the data once it is received from the laboratory. The release extended past the liner and that area will be excavated at a once the majority of the large excavation is backfilled and confirmation samples will be collected and submitted to a laboratory for analysis and will be provided to NMOCD.

Due to the sensitivity of the 10 foot deep excavation near State Hwy 207 Apache has decided to proceed with lining the release area and begin backfilling the excavation beginning tomorrow March 9, 2018. Please let me know if you have any questions or wish to discuss. Thanks and have a good day.

## **BRUCE BAKER**

ENVIRONMENTAL TECHNICIAN NORTHWEST DISTRICT direct 575-393-7106 ext 1523 | Cell 432-631-6982

APACHE CORPORATION 2350 W. MARLAND BLVD HOBBS , NM 88240 ApacheCorp.com | LinkedIn | Facebook | Twitter | StockTwits | YouTube

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Thursday, March 08, 2018 9:16 AM
To: Baker, Larry <<u>Larry.Baker@apachecorp.com</u>>
Cc: Naranjo, Mark <<u>MNaranjo@slo.state.nm.us</u>>
Subject: RE: 1RP-4898 Proposal

Good morning Mr. Baker:

I did a search for the lined area discovered within the current excavation. Based on the documents available, there are two unresolved 1RPs that likely occurred in the current impacted area: 1RP-1700 and 1RP-2130. Please review and verify that releases for 1RP-1700 and 1RP-2130 do indeed overlap the release area for 1RP-4898. If so, NMOCD and NMSLO will require some time to review the proposed delineation plan to encompass all three 1RPs.

Thanks, Olivia

From: Baker, Larry [mailto:Larry.Baker@apachecorp.com]
Sent: Tuesday, March 6, 2018 4:43 PM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>
Subject: 1RP-4898 Proposal

Ms. Yu,

Due to the depth of the pipeline failure (10 feet) below ground surface a larger than normal excavation to repair line was required. Due to the vicinity to NM State Hwy 207 the decision was made to go ahead and excavate the release to find the lateral extent. A vertical was installed and advanced to a depth of 27 feet below ground surface and field samples were titrated for chloride a one foot intervals. Samples were sent to the laboratory to analysis chloride contamination in 2 foot intervals and the 11 and 13 foot intervals were analysis for TPH and Btex. The Chloride data did not decline with regards to depth and the TPH and Betex laboratory analysis came back below regulatory guidelines. Apache proposes the following below for NMOCD consideration.

- A. Every attempt will be made to excavate and collect wall samples to chloride values of less than 600 and under TPH and Btex regulatory guidelines. If that cannot be achieved due to vicinity to the State Hwy then Apache will collect and submit samples to the laboratory and communicate those results to NMOCD.
- B. Once the lateral extent is achieved or until every extent possible a 20 mil reinforce liner will be installed to prevent the migration of chlorides. The east portion area will be lined at a depth of approximately 11 feet and due to a previous liner in the excavation area will be installed at the present depth of the current liner and welded to extend the width of the new liner to the north.
- C. The liner will be seated properly and padded with a foot of blow sand and then the excavation will be backfilled with clean imported caliche to a depth of 2 feet below ground surface.
- D. Once the liner is installed than a 10 inch in diameter PVC pipe will be placed inside the excavation vertically seated under the liner with a piece of 20 mil reinforce liner around the pipe and welded or glued to seal the cut in the liner to install the pipe. The pipe will be capped to prevent any water to enter the pipeline.
- E. Excavated soil will be evaluated to determine if any can be utilized (under 600 chlorides and below TPH and Btex regulatory guidelines) If field indicates that chloride values are under 600 than a sample will be collect and submitted for confirmation of chloride and TPH and Btex for every 50 cubic yards of soil.

F. Once the excavation is backfilled a future soil bore will be scheduled and be installed utilizing the PVC pipe to prevent damage to liner and to fully delineate the release to depth.
Attached are diagrams, laboratory analysis to date for your review. I attached and a google image referencing what I considered the 4 cardinal directions. Please let me know if you have any questions or wish to discuss. Also the photo are prior to me having them remove the line. Thanks and have a good evening.

## **BRUCE BAKER**

ENVIRONMENTAL TECHNICIAN NORTHWEST DISTRICT direct 575-393-7106 ext 1523 | Cell 432-631-6982

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