



**Site Work Plan:**

**Comanche Compressor Station**

**Sec 34 T7S R26E**

**Chaves County, New Mexico**

**March 19, 2015**

**1.0 Introduction**

**2.0 Background**

**3.0 Recommended Remedial Action Levels**

**4.0 Remedial Action Plan**

## 1.0 Introduction

This work plan for the Comanche Compressor Station has been developed to facilitate the remediation activities at the location. This plan is based on initial reporting, visual observation, as well as regulations and guidelines of the NMOCD.

## 2.0 Background

Agave Energy Company (Agave) is the operator of the Comanche Compressor Station. On the morning of January 6, 2015 a release of natural gas condensate was discovered at the facility. Upon further investigation it was determined that the cause of the release was the water drain line on the 300 bbl condensate storage tank. The frigid temperatures of the preceding weekend had caused a ball valve on the drain line to freeze and rupture. This resulted in the release of approximately 180 bbls of condensate. The tank was located inside of an earthen containment, which prevented the liquids from dissipating horizontally. The portion of the liquid that didn't volatilize infiltrated the containment itself and the soil below.

## 3.0 Recommended Remedial Action Levels

Based on the *Guidelines for Remediation of Leaks, Spills and Releases* (NMOCD, August 13, 1993), the site ranking criteria are as follows.

Depth to groundwater <50' (per NMOSE)**	20
Not in a wellhead protection area	0
Distance to surface water body >1000'	<u>0</u>
<b>Total Ranking Score =</b>	<b>20</b>

\*\*Note: There is no available NMOSE data on groundwater depth within two miles of the location. All of the available data is for wells that are in close proximity to the Pecos River, and would likely have shallower ground water, than would be present at the Comanche Compressor Station.

For sites with a Total Ranking Score of >19, the Recommended Remedial Action Levels (RRAL) are:

Benzene	10 ppm
BTEX	50 ppm
TPH	100 ppm

#### 4.0 Remedial Action Plan

Agave has proposed and will implement the following actions for this site.

1. Agave will collect soil samples in an attempt to characterize the area of contamination.
2. Agave will excavate all soil with apparent signs of contamination (i.e. staining, odor, free liquids), and where sampling has indicated the presence of contamination.
  - a. Any excavated material proven to be below RRAL will be stockpiled on location to be used to fill in the excavation and rebuild the containment.
  - b. All excavated material that exceeds RRAL will be remediated on site, by means of aeration and volatilization.
  - c. Any excavated material that we are unable to remediate to meet RRAL, will be disposed of at an OCD approved land farm or landfill.
3. After excavation, Agave will resample the area until the RRAL are met.
4. After confirmation that all excavated material has been remediated to meet the RRAL, the excavation will be refilled.
5. Agave will construct a new earthen containment, lined with geo-textile fabric that is impervious to condensate and produced water.

If you have any questions regarding this site work plan, please do not hesitate to call me at (575) 513-8988, or email at [KEgan@yatespetroleum.com](mailto:KEgan@yatespetroleum.com).

Respectfully,

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