Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Thursday, February 21, 2019 8:37 AM
To: 'Joel Lowry'; rmann@slo.state.nm.us; Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD
Cc: Ericson, Dean
Subject: RE: ETC's Avalon Compressor Station - (2) Releases - 2RP-4657 and 2RP-4848

Hey Joel,

After talking to Dean yesterday I thought we had this figured out. 2RP-4657 was initially processed as a dry gas incident, which Mike already approved the closure on. There wouldn't have been any remediation involved with that one if that was the case. If there were liquids (condensate) involved on 2RP-4657 please resubmit a C-141 with the spilled liquid calculations included. We will just give it the same RP-4657 number and process it like it is reopened.

We will review the remediation plan on 2RP-4848 as soon as possible.

Thanks you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
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From: Joel Lowry <joel@lowryenvironmental.com>
Sent: Thursday, February 21, 2019 7:27 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; rmann@slo.state.nm.us; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Subject: [EXT] ETC's Avalon Compressor Station - (2) Releases - 2RP-4657 and 2RP-4848

Mr. Hamlet,

I apologize for the late response, I was stuck in the field yesterday. Let me start by apologizing for any confusion. Now that I am back in the office it has taken me a moment to get my head wrapped around everything. On further review it appears that there have been two reportable release at that facility that are in need of remediation; 2RP-4657 and 2RP-4848. 2RP-4657 occurred in March of 2018. 2RP-4848 occurred in July of 2018 and is approximately 150 ft north of 2RP-4657. The Remediation Work Plans for each of the releases are attached. Also attached is the revised soil chemistry table that has been prepared for 2RP-4657.

2RP-4657 – ETC's Avalon Compressor Station – March 2018

During initial soil investigations conducted on 8/30/2018 and 9/5/2018, thirteen (13) delineation soil samples were collected and field screened for chloride and hydrocarbon contamination. Select soil samples were submitted to the laboratory for confirmation analysis of BTEX, TPH and Chloride. Laboratory analytical results indicated two (2) soil samples TP-1 @ 2' and TP-5 @ 2' exhibited BTEX and/or TPH concentrations above the NMOCD Closure Criteria. Laboratory analytical results from delineation soil samples indicated soil was not affected above the NMOCD Closure Criteria beyond 4 ft. bgs at either location.

ETC has proposed to excavate impacted soil affected above the NMOCD Closure Criteria in the areas characterized by samples points TP-1 and TP-5. Upon excavating impacted soil within the affected area, confirmation soil samples will be collected from the floor and sidewalls of the excavated area(s) and submitted to the laboratory for analysis of BTEX, TPH and chloride. I have attached a revised chemistry table that reflects the corrected BTEX data.

2RP-4848 - ETC's Avalon Compressor Station – July 2018

During initial soil investigations conducted on 7/6/2018, 7/10/2018, 7/12/2018 and 7/20/2018, twenty-three (23) delineation soil samples were collected and field screened for chloride and/or hydrocarbon contamination. Select soil samples were submitted to the laboratory for confirmation analysis of BTEX, TPH and Chloride. Laboratory analytical results indicated seven (7) soil samples (TP-2 @ 8', V1 @ 6", V2 @ 6", V3 @ 6", V4 @ 6', H1 @ 4" and H2 @ 4") exhibited BTEX, TPH and/or chloride concentrations above the NMOCD Closure Criteria. Laboratory analytical results from delineation soil samples indicated depths of impact above the NMOCD Closure Criteria range from less than 2 ft to 12 ft bgs.

ETC has proposed to excavate impacted soil affected above the NMOCD Closure Criteria in the areas characterized by samples points TP-2 @ 8', V1 @ 6", V2 @ 6", V3 @ 6", V4 @ 6', H1 @ 4" and H2 @ 4" depths ranging from 1 to 10 ft. bgs. Upon excavating impacted soil within the affected area, confirmation soil samples will be collected from the floor and sidewalls of the excavated area(s) and submitted to the laboratory for analysis of BTEX, TPH and chloride. Upon receiving laboratory analytical results from confirmation soil samples, the excavation will be advanced as necessary. Complete advancement of the excavation adjacent to and beneath the produced water lines in the central portion of the release site and toward the east may be precluded due to the presence of active high-pressure lines and/or above-ground storage tanks. In the event impacted soil affected above the NMOCD Closure Criteria is discovered adjacent to the produced water tanks and/or above-ground storage tanks, a deferral request may be sought. (Those impacts will be documented on a scaled site map)

It is anticipated that respective excavations will measure 2,500 and 4,200 sq. ft. With your permission, ETCs is requesting a modified sampling plan in which excavation confirmation soil samples representative of every 500 sq. ft. are collected as opposed to every 200 sq. ft.

Respectfully,

Joel Lowry
Environmental Professional

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