El Paso Natural Gas Company, L.L.C.
a Kinder Morgan company

January 31, 2019

State of New Mexico
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 85705

Subject: El Paso Natural Gas Company, L.L.C., Florida Compressor Station Release OCD 2RP-5168

EPNG is submitting the Site Assessment/ Characterization in accordance with 19.15.29.10 NMAC for the facility referenced above.

EPNG would like to request a 45 day extension to complete the remediation activities associated with OCD case Number 2RP-5168 based on the information provided below.

As described Release Notification form C-141 submitted to your department on November 6, 2018 (Appendix A), Mechanical hydraulic oil pump seal failed on Florida A-01 unit releasing approximately 1500 gallons. 1200 gallons were contained on the building basement and approximately 300 gallons of lube oil were released out of the building into the environment.

Characterization Requirements:

1. **Site Map.**
   EPNG conducted two sample events. Location maps and scaled site maps showing the impacted area and sample points are located on Appendix B.
2. **Depth to water.**
   Depth to water based on USGS last reading on nearest wells (Appendix C) is between 60 and 90 ft. approximately.
3. **Wellhead protection area.**
   There are no water sources within half mile of the release. Appendix D
4. **Distance to significant water sources**
   There are no significant water sources as defined in Subsection P of 19.15.17.7 NMAC. Appendix D.
5. **Soil Waste Characteristics.**
   Appendix B provides a site map with sample points and laboratory results indicating extends of soil contamination.

   Contractors were mobilized on November 6, 2018 to collect remaining liquids. Impacted soil was excavated and EPNG conducted sampling to determine the extent of the impacted area.

   Appendix F shows a map of the sampling and the laboratory results received on November 14, 2018. A total of 16 grab samples were collected by a contractor and sent to a certified

laboratory for analysis. The contractor requested TPH and Total BTEX. These results we only used to determine the extent of the contamination and not to confirm cleanup.

On December 17, EPNG mobilized contractors to continue excavating and collecting the impacted soil. Some areas are very close or below the exhaust pad making the excavation very difficult.

At this time, approximately 15 yards of contaminated soil have been collected and stored on a rolloff bin at the facility. After the remaining contaminated soils have been collected, they will be sent to disposal to an approved landfill. A third party laboratory conducted the final sampling on January 11, 2019. The report was received on January 28, 2019. A total of 16 grab samples were collected by the contractor and sent to a certified laboratory for analysis. Analyses were performed in accordance with Table I of 19.15.29.12 NMAC. Laboratory results are shown in Appendix G.

EPNG intended to complete the cleanup and sent a closure report within 90 days of the release. EPNG did not reached clean up levels in accordance with Table I of 19.15.29.12 NMAC. For these reason, EPNG is submitting a remediation plan in accordance with 19.15.29.12 NMAC.

Remediation Plan

EPNG is requesting a 45 day extension and will perform the following activities to ensure sample concentrations met the closure criteria as defined on Table I of 19.15.29.12 NMAC. EPNG will commence remediation activities as soon as possible as described below:

- EPNG will contract a company to perform bores and take samples at 1 foot and 2 feet depth at each location that shows contamination above the cleanup levels. Lateral extents of the contamination have already been determined as described on the Soil Waste Characteristic section above.
- Once the depth of the contamination has been stablished, EPNG will excavate and collect the contaminated soils for disposal.
- There are complicated areas to excavate due to Exhaust equipment (Appendix E- Pictures). EPNG will intent to collect as much as possible the contaminated soils immediately under or around the exhaust pad without compromising the equipment.
- A grab sample of each sample point shown on the sample location map (Appendix B) will be collected and sent to a certified laboratory for analysis in accordance with Table I of 19.15.29.12 NMAC.
- Once Table I closure criteria has been met, EPNG will backfill the affected area.
- A final closure report will be provided to your department within 45 days.

If you have any questions or need additional information please contact me at 915-587-3694 or by email at cesar_ochoa@kindermorgan.com.

Sincerely,

Cesar G. Ochoa, P.E.

EHS Engineer II

APPENDIX A

Notification Form C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party El Paso Natural Gas Company, L.L.C.	OGRID 7057
Contact Name Cesar G. Ochoa	Contact Telephone 915-587-3694
Contact email cesar_ochoa@kindermorgan.com	Incident # *(assigned by OCD)*
Contact mailing address 8645 Railroad Dr., El Paso, TX 79904	

Location of Release Source

Latitude 32.21814 Longitude 107.42181
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Florida Compressor Station	Site Type Natural Gas Compressor Station
Date Release Discovered November 5, 2018 @ 8:30 am	API# *(if applicable)*

Unit Letter	Section	Township	Range	County
I	14	24S	6W	Luna County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (*Name: El Paso Natural Gas Company, L.L.C.*_____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☒ Other (describe) Lune Oil	Volume/Weight Released (provide units) Approximately 300 gallons	Volume/Weight Recovered (provide units)

Cause of Release
Mechanical hydraulic oil pump seal failed on Florida A-01 unit releasing approximately 1500 gallons. 1200 gallons were contained on the building basement and approximately 300 gallons of lube oil were released out of the building into the environment.
Corrective Actions:
Contractors were mobilized on November 6, 2018 to begin corrective activities. Impacted soil will be excavated and collected for disposal. In Addition, samples will be collected to determine affected area and confirm cleanup levels.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☒ The source of the release has been stopped.

☒ The impacted area has been secured to protect human health and the environment.

☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Cesar G. Ochoa Title: EHS Engineer II

Signature: Date: November 8, 2018

email: Cesar_ochoa@kindermorgan.com Telephone: 915-587-3694

OCD Only

Received by: Date:

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	60 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☒ Yes ☐ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
☒ Field data
☒ Data table of soil contaminant concentration data
☒ Depth to water determination
☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
☒ Boring or excavation logs
☒ Photographs including date and GIS information
☒ Topographic/Aerial maps
☒ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Cesar G Ochoa Title: EHS Engineer II

Signature: Date: 1/31/2019

email: Cesar_ochoa@kindermorgan.com Telephone: 915-587-3694

OCD Only

Received by: Date:

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

☒ Detailed description of proposed remediation technique
☒ Scaled sitemap with GPS coordinates showing delineation points
☒ Estimated volume of material to be remediated
☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

☒ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

☒ Extents of contamination must be fully delineated.

☒ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Cesar G Ochoa Title: EHS Engineer II

Signature: Date: 1/31/2019

email: Cesar_ochoa@kindermorgan.com Telephone: 915-587-3694

OCD Only

Received by: Date:

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

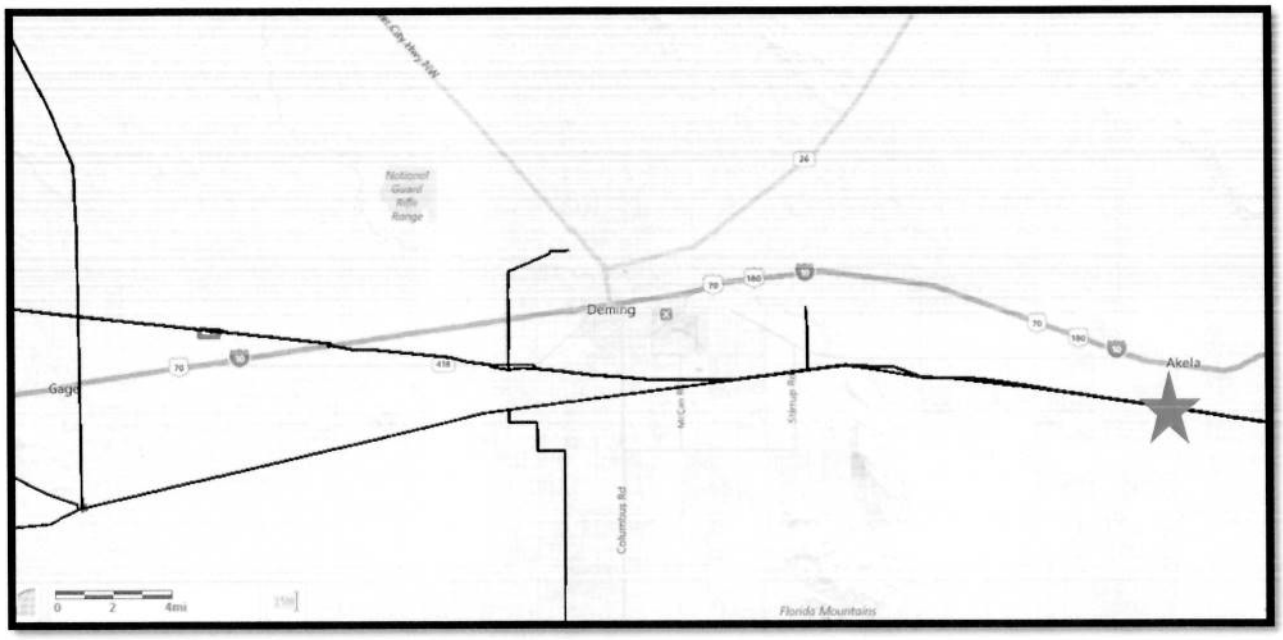
Signature: Date:

APPENDIX B

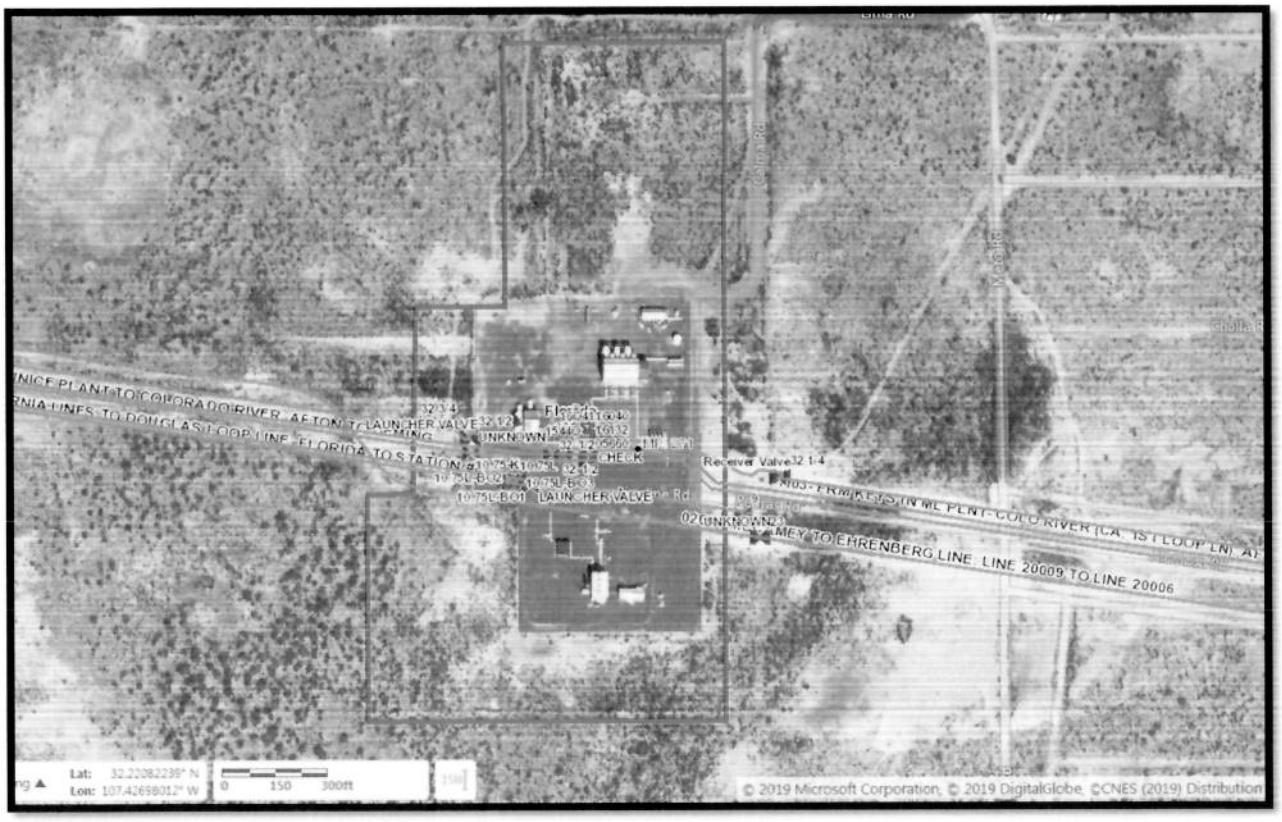
Site Map

Site Maps

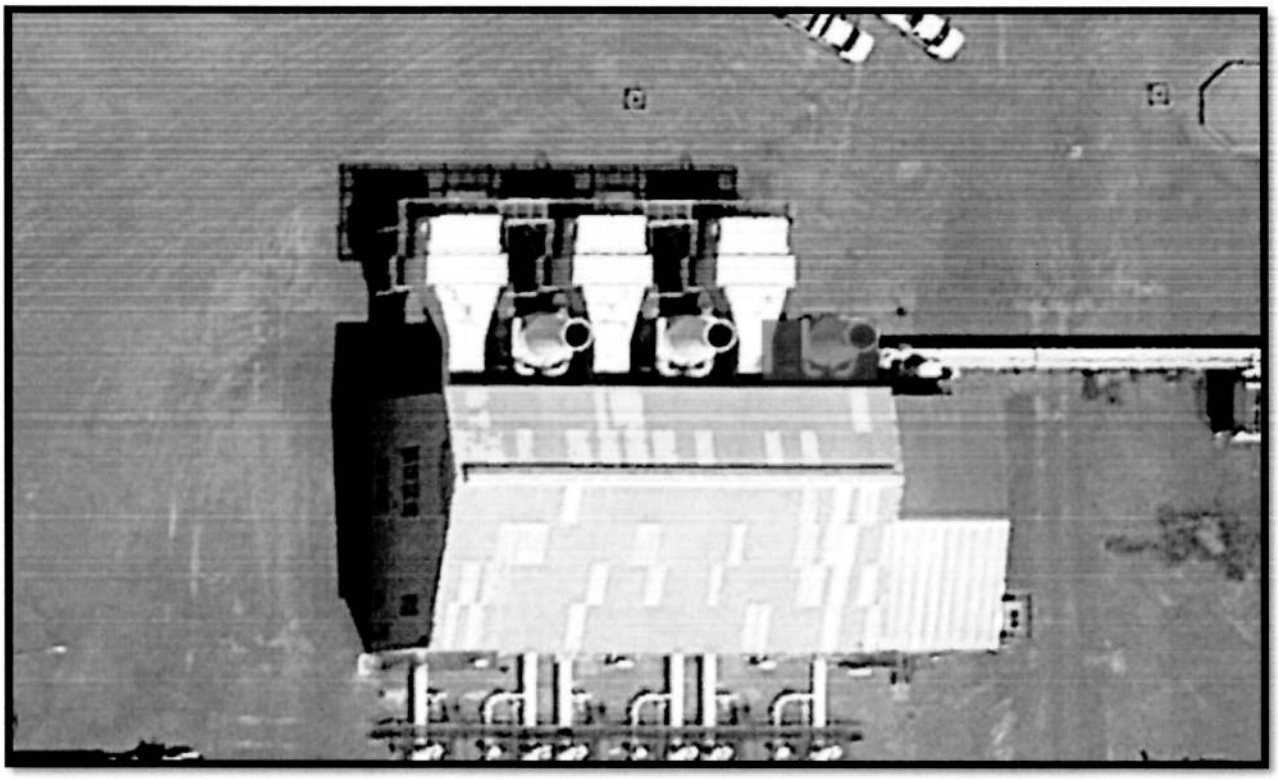
El Paso Natural Gas Company, L.L.C.
a Kinder Morgan company



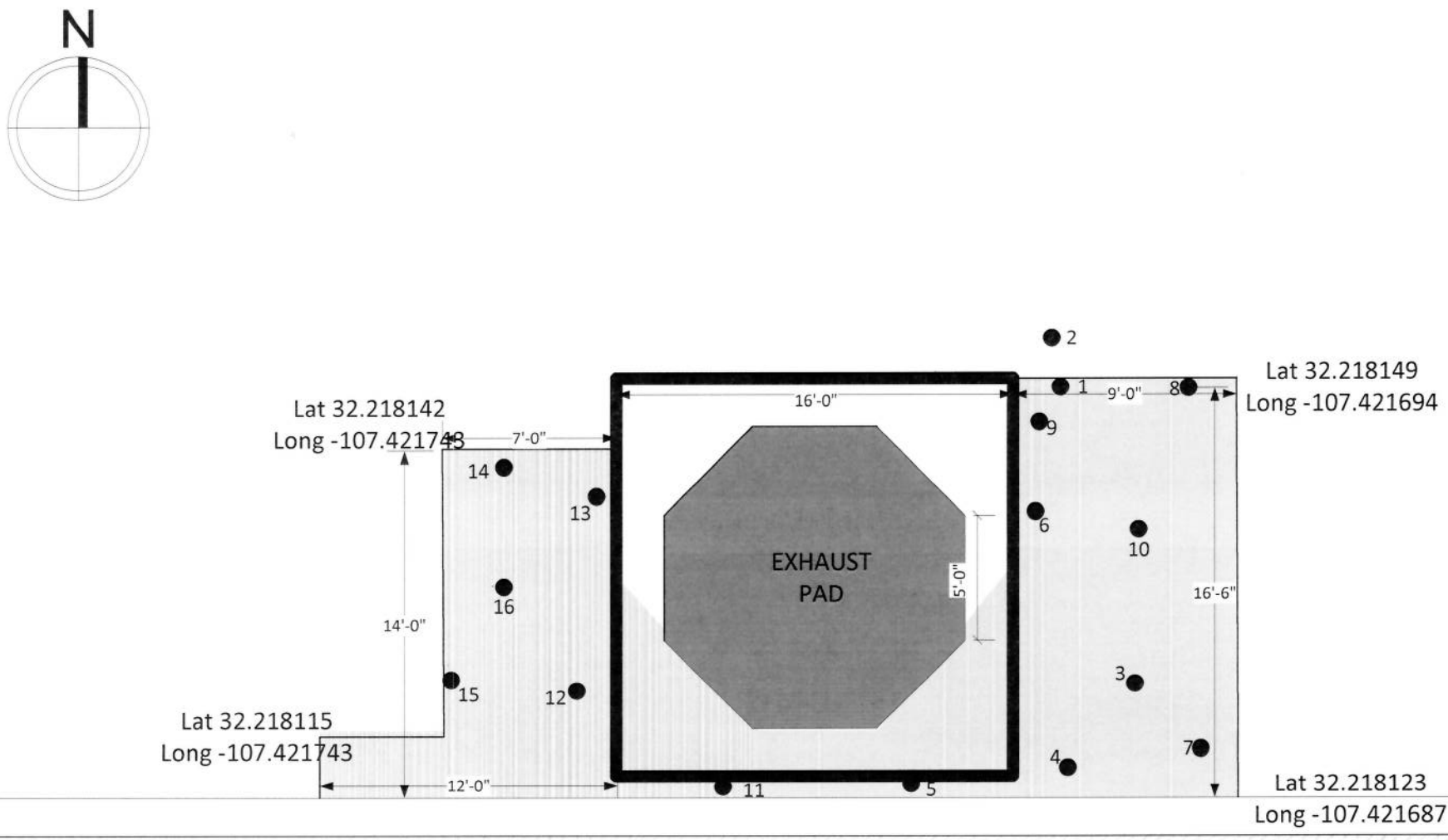
Facility Location

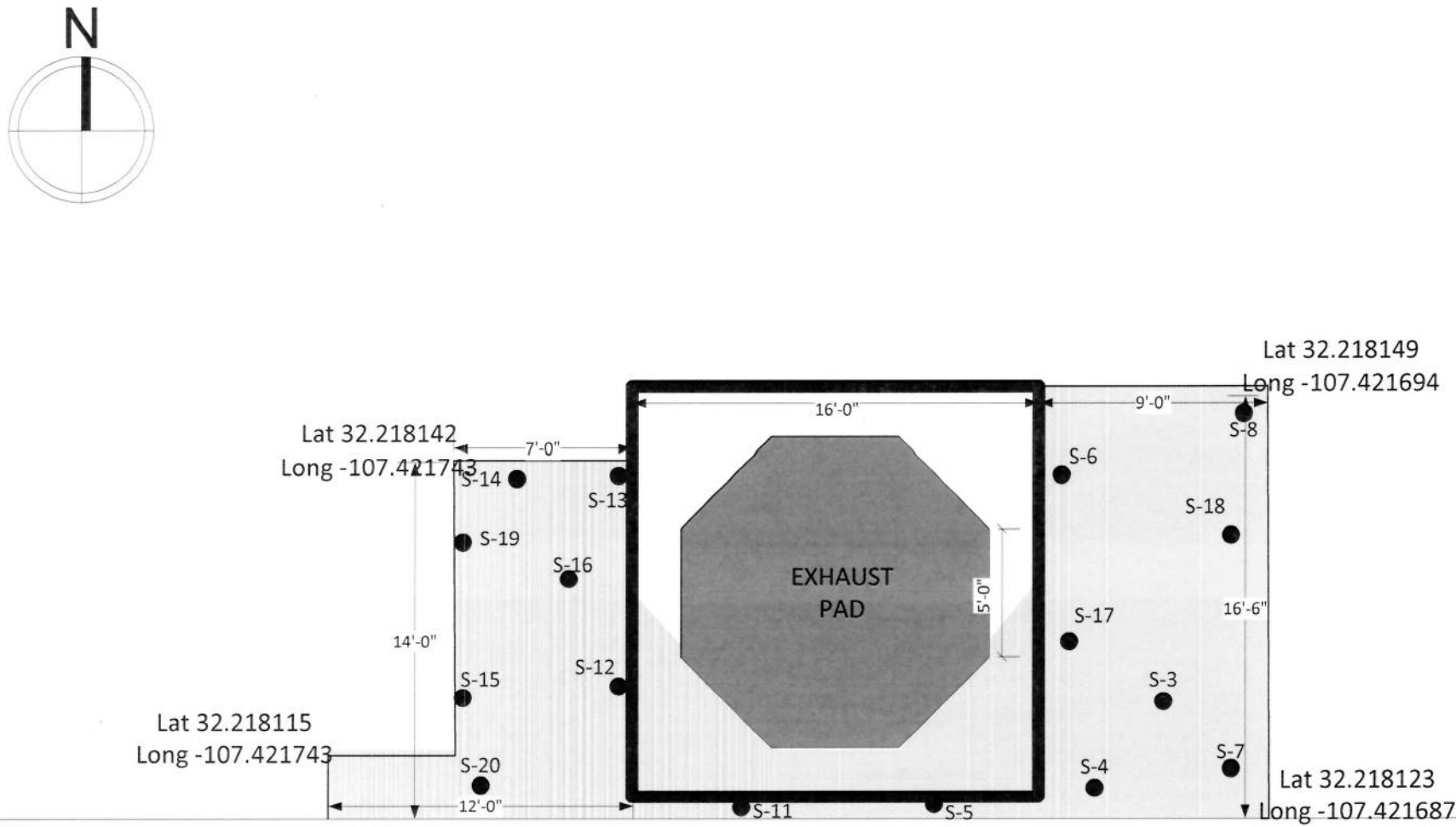


Facility aerial



Release location

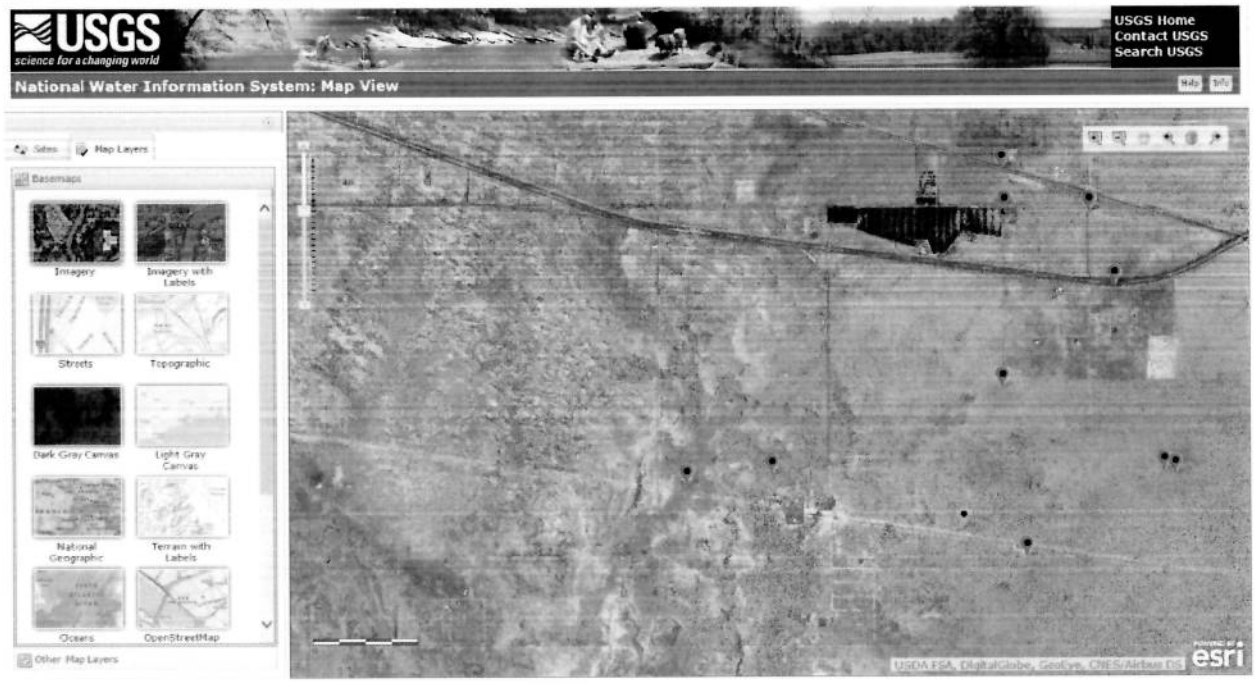

N
Lat 32.218142
Long -107.421743
Lat 32.218149
Long -107.421694
Lat 32.218115
Long -107.421743
Lat 32.218123
Long -107.421687
EXHAUST
PAD
16'-0"
9'-0"
7'-0"
14'-0"
5'-0"
16'-6"
12'-0"
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
COMPRESSOR BUILDING
Impacted Area
0.0 ft.
3.6 ft.
6.0 ft.
12.0 ft.
EI PASO NATURAL GAS COMPANY
FLORIDA CS
SITE MAP WITH SAMPLE LOCATIONS
Laboratory results
November 14, 2018



Impacted Area	LONGITUD LATITUD	El PASO NATURAL GAS COMPANY FLORIDA CS	SITE MAP WITH SAMPLE LOCATIONS	Laboratory results January 28, 2019

APPENDIX C

Depth to Water



USGS 321259107241601 24S.06W.13.400

Luna County, New Mexico
Latitude 32°12'59", Longitude 107°24'16" NAD27
Land-surface elevation 4,130.00 feet above NGVD29
The depth of the hole is 233 feet below land surface.

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

Date	Time	Water-level date-time accuracy	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Water-level accuracy	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1942-09-19		D	65.00			2		U		U	A

USGS 321250107235401 24S.05W.18.33344

Luna County, New Mexico
Latitude 32°12'50", Longitude 107°23'54" NAD27
Land-surface elevation 4,143 feet above NAVD88

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

Date	Time	Water-level date-time accuracy	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Water-level accuracy	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1973-03-22		D	81.76			2		U		U	A

Depth To Water

El Paso Natural Gas Company, L.L.C.
a Kinder Morgan company

USGS 321341107240201 24S.06W.13.222

Luna County, New Mexico
Latitude 32°13'41", Longitude 107°24'02" NAD27
Land-surface elevation 4,152 feet above NGVD29

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

Date	Time	Water-level date-time accuracy	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Water-level accuracy	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1973-03-22		D	91.20			2		U		U	A
1982-01-18		D	98.87			2		U		U	A
1987-01-12		D	95.20			2		U		U	A
1992-02-07		D	85.77			2		U		U	A
1997-02-14		D	83.45			2		S		U	A

USGS 321315107254801 24S.06W.14.312

Luna County, New Mexico
Latitude 32°13'12", Longitude 107°25'55" NAD27
Land-surface elevation 4,115 feet above NGVD29

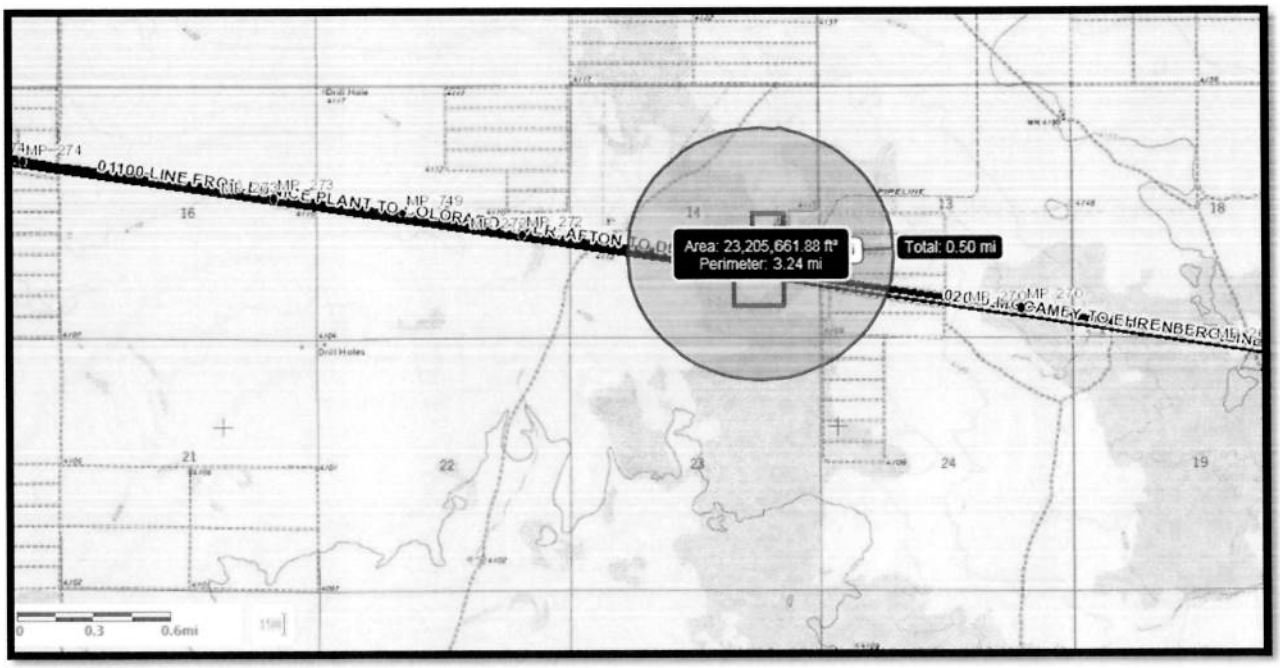
Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

Date	Time	Water-level date-time accuracy	Water level, feet below land surface	Water level, feet above specific vertical datum	Referenced vertical datum	Water-level accuracy	Status	Method of measurement	Measuring agency	Source of measurement	Water-level approval status
1970-01-21		D	50.49			2		U		U	A
1970-02-04		D	51.21			2	P	U		U	A
1974-03-05		D	60.06			2		U		U	A
1975-01-15		D	63.41			2		U		U	A
1976-02-04		D	63.01			2		U		U	A
1982-01-18		D	38.14			2	P	U		U	A
1987-01-12		D	35.30			2		U		U	A
1992-02-07		D	48.62			2		U		U	A
1997-02-14		D	63.25			2		S		U	A
2007-04-13	08:10 MDT	m	47.89			2		S	NM001	A	A
2012-03-10	08:10 MST	m	61.66			2	R	T	NM001	R	A

APPENDIX D

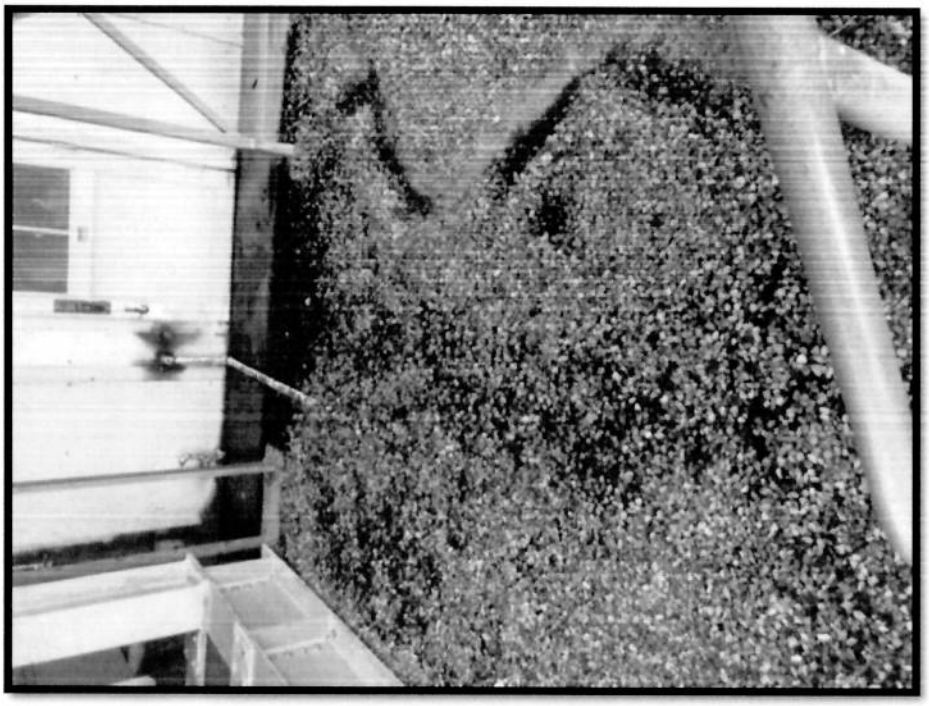
Well head Protection area/ Distance to Significant Water Sources



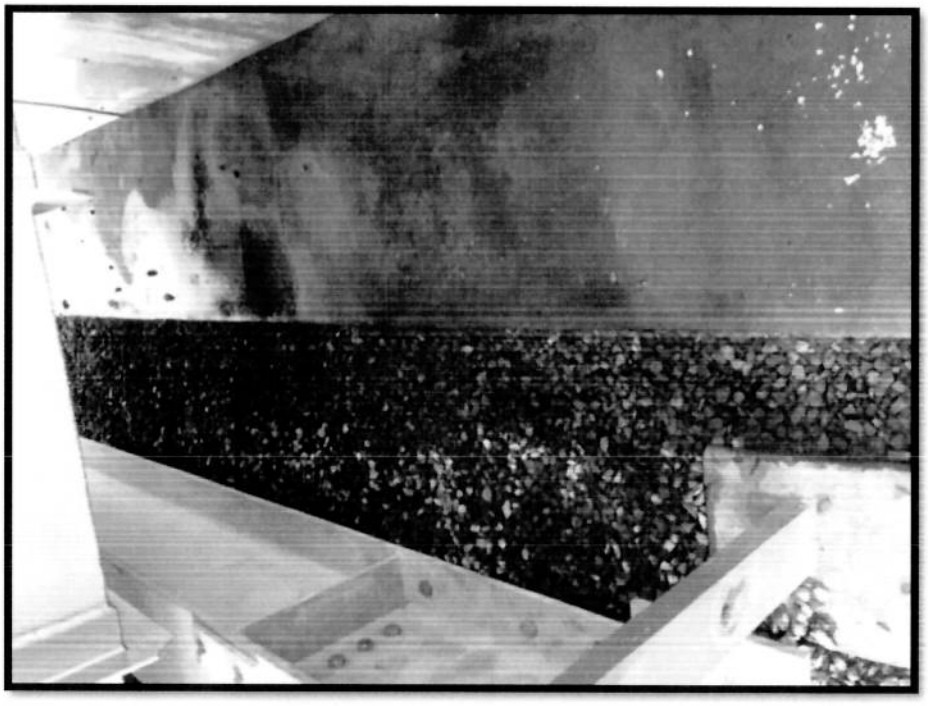
USGS Topo Map – Indicating no water sources within .5 miles

APPENDIX E

Pictures



Florida Unit A-01 Oil Release 11/5/2018



Florida Unit A-01 Oil Release 11/5/2018

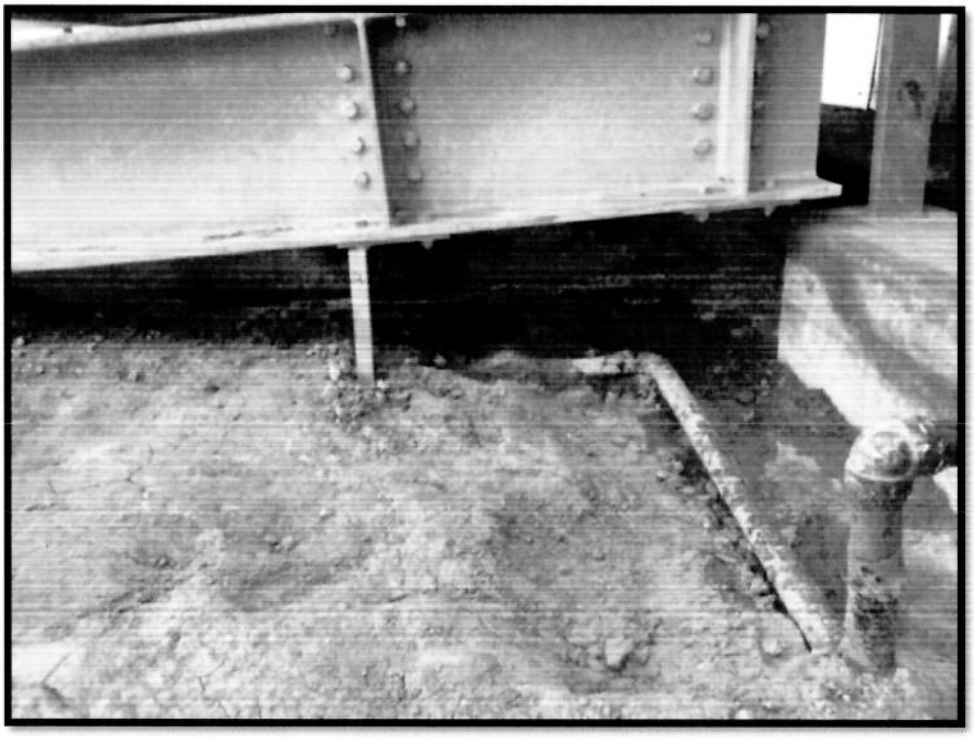
Photo Log

El Paso Natural Gas Company, L.L.C.
a Kinder Morgan company

Florida Unit A-01 Oil Release 11/5/2018

Sample Locations 1/11/2019

Sample Locations 1/11/2019



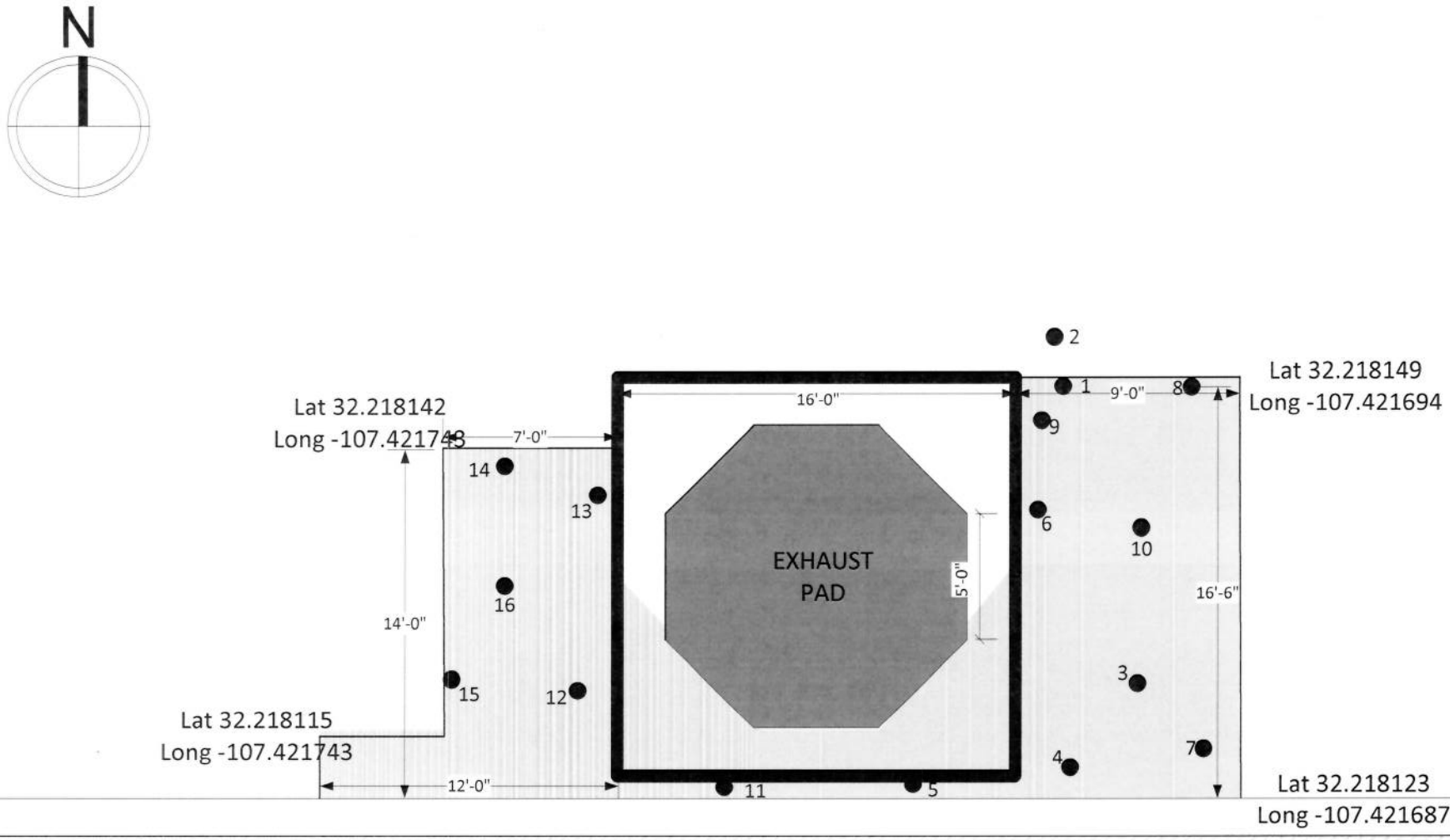
Sample Locations 1/11/2019

Sample Locations 1/11/2019

APPENDIX F

Laboratory Results

November 14, 2018



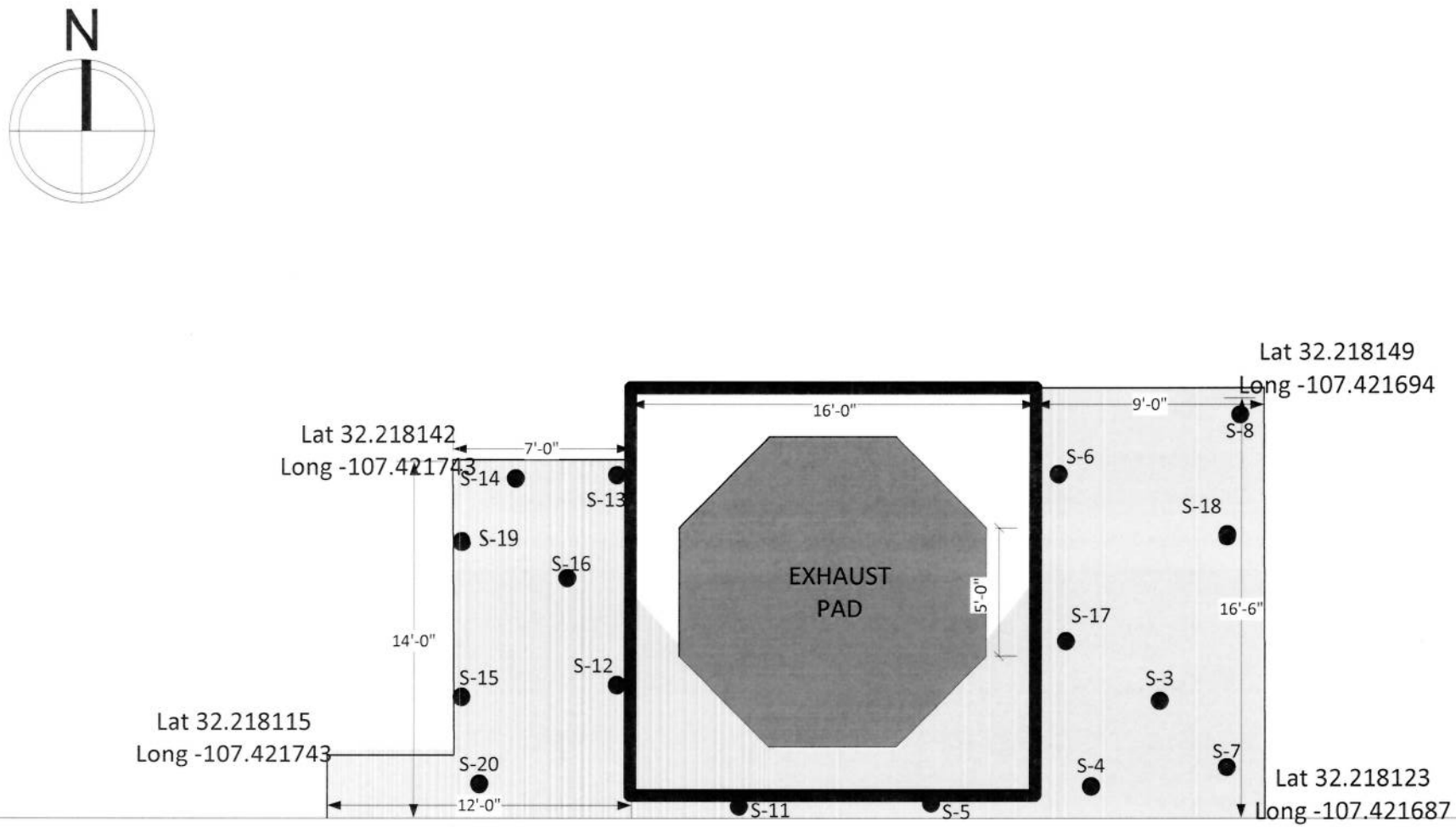
COMPRESSOR BUILDING

Impacted Area	0.0 ft. 3.6 ft. 6.0 ft. 12.0 ft.	El PASO NATURAL GAS COMPANY FLORIDA CS	SITE MAP WITH SAMPLE LOCATIONS	Laboratory results November 14, 2018

APPENDIX G

Laboratory Results

January 28, 2019



Impacted Area	LONGITUD LATITUD	El PASO NATURAL GAS COMPANY FLORIDA CS	SITE MAP WITH SAMPLE LOCATIONS	Laboratory results January 28, 2019