



March 27, 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 Closure Report in accordance with 19.15.29.10 NMAC for the facility referenced above.

As described Release Notification form C-141 submitted to your department on November 6, 2018 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.

***Description of Remediation Activities:***

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.

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 were 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. A third party laboratory conducted the final sampling on January 11, 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 were submitted to the agency along with the remediation plan on January 29, 2019.

EPNG requested a 45 day extension to reach cleanup levels and provided a remediation plan in accordance with 19.15.29.12 NMAC on January 29, 2019.

In accordance with the remediation plan, EPNG contracted a third party company to perform bores and take samples at 1 foot and 2 feet depth at each location that shows contamination above the cleanup levels. This report was submitted to the agency on February 22, 2019. Along with this report, EPNG requested a deferral as we believe the area between the compressor building and the exhaust pad is immediately under and around equipment making it very



difficult to excavate due to equipment and piping in the area. The Agency requested additional samples at Sample locations S-5 and S-11. Lab results are attached on Appendix D.

The depth of the contamination has been established at 1 foot; EPNG excavated and collected the contaminated soils for disposal. A grab sample of each sample point showing contamination above the limits were collected and analyzed in accordance with Table I of 19.15.29.12 NMAC.

Table 1(Appendix D )show all results below the limits establishes on Table I of 19.15.29.12 NMAC.

The results of S-5 and S-11 at 3 feet deep are attached, EPNG only gathered the samples at this two location, we were not able to excavate the near areas and collect the contaminated soil.

All contaminated soils has been collected on a roll off bin staged in a secure area within Florida Compressor Station and will be disposal to an approved land fill.

Sincerely,

Cesar G. Ochoa, P.E.

EHS Engineer II



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

## **Appendix A**

### **Form C-141- Closure**

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Cesar G. Ochoa Title: EHS Engineer II  
 Signature: [Signature] Date: 3/27/2019  
 email: Cesar\_Ochoa@KinderMorgan.com Telephone: 915 587 3694

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

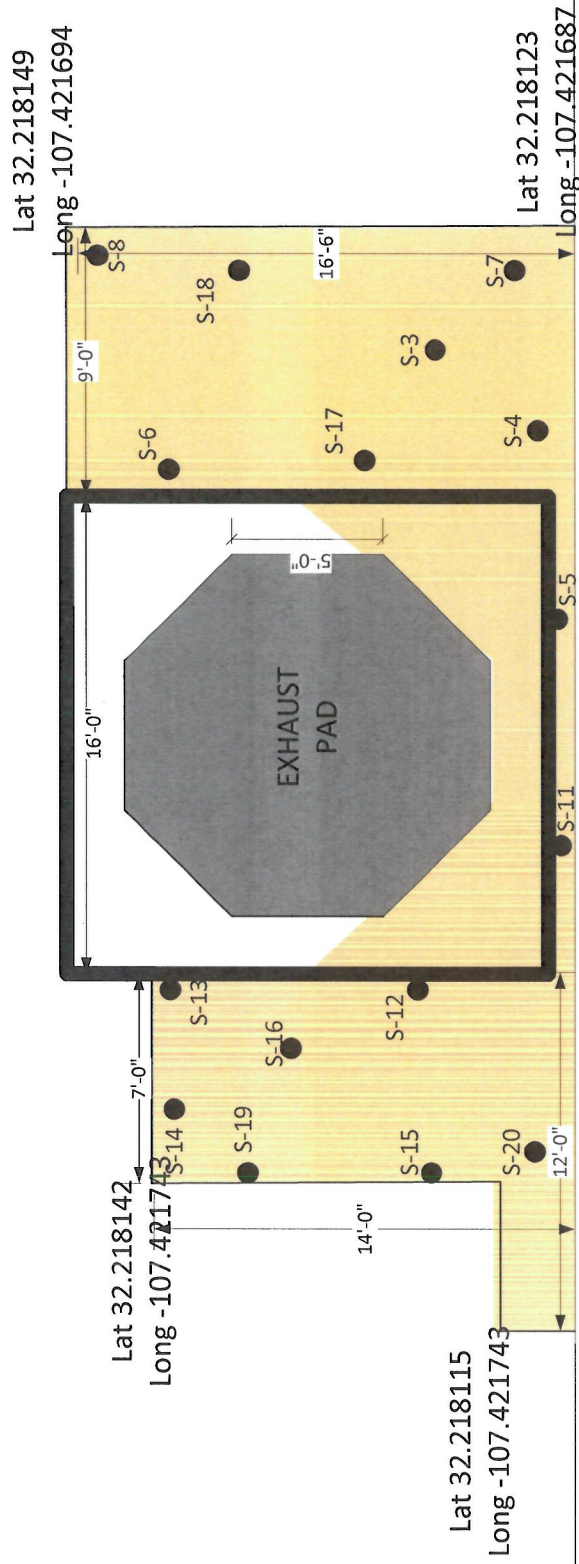
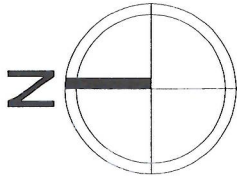
Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



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**Appendix B**  
**Site and Sampling Diagram**





## COMPRESSOR BUILDING



Impacted Area



LONGITUD  
LATITUD

EI PASO NATURAL GAS  
COMPANY  
FLORIDA CS

SITE MAP WITH  
SAMPLE LOCATIONS

Laboratory results  
January 28, 2019







Release location





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## **Appendix C**

### **Photographs of the remediated site prior to backfill**



Spill Area



Spill area excavated 1 ft. deep





Sample area S-8 excavated 1 ft deep



Area between compressor building and exhaust pad





Samples gathered at 3 ft. deep



## Appendix D

### Table 1- Laboratory Results and Laboratory Analysis Reports

