Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD **Sent:** Tuesday, April 9, 2019 1:56 PM

To: 'Ochoa Vidales, Cesar G'; Bratcher, Mike, EMNRD

Cc: Hamlet, Robert, EMNRD

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station **Attachments:** (C-141 Final) DEFERRAL Florida-Closure Report 4.9.19.pdf

RE: [EXT] C-141 Release Notification - EPNG Florida Station

Mr. Ochoa,

OCD agrees that the release area was properly delineated and remedied but, unfortunately, there is still contamination in place. According to the rule, this closure cannot be approved. At this time OCD approves a deferral for EPNG Florida Station **2RP-5168**. The Final C-141 will be accepted for the record and marked accordingly. The release will remain open in OCD database files and reflect an open environmental issue. Regards,

Victoria Venegas EMNRD OCD-District II 811 S First St. Artesia NM 88210 Victoria.Venegas@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Ochoa Vidales, Cesar G < Cesar Ochoa@kindermorgan.com >

Sent: Tuesday, April 2, 2019 10:46 AM

To: Venegas, Victoria, EMNRD < Victoria. Venegas@state.nm.us>; Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us>

Cc: Hamlet, Robert, EMNRD < Robert. Hamlet@state.nm.us>

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

Hi Ms. Venegas,

The depth to water based on USGS nearest wells is between 60 and 90 ft. This information was provided on the report sent on 1/31/2019. Based on this information and according to Table 1, all results are "non- detect" or below the limits, except for the area below the exhaust pad (16ft x 4ft) were S-11 and S-5 samples were gathered. Attached is a photo of the area below the exhaust pad, it shows that we intended to excavate as much as possible but contamination still remains in this area. I hope this clarify your request below. If you have any other questions or need additional information please let me know.

Regards,

Cesar G. Ochoa, P.E. Pipeline Engineer- EHS 8645 Railroad Dr. El Paso, TX. 79904 Office (915) 587-3694, Cell (915) 345-6605, Fax (915) 587-3639



From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]

Sent: Friday, March 29, 2019 11:49 AM

To: Ochoa Vidales, Cesar G; Bratcher, Mike, EMNRD

Cc: Hamlet, Robert, EMNRD

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

[This email message was received from the Internet and came from outside of Kinder Morgan]

RE: [EXT] C-141 Release Notification - EPNG Florida Station 2RP-5168

Hello Mr. Ochoa, OCD has received your Closure Report for EPNG Florida Station 2RP-5168, thank you.

- Please note, that if the impacted material above Table I Closure Criteria limits for this site is still in place, OCD can't approve a closure.
- OCD understand that if the site was excavated up to 1-foot, contaminated soil remains in place. If this is the case, OCD could grant a deferral request for this site considering that the site has been fully delineated. Please, clarify this point.

Please let me know if you have any question or concern. Regards,

Victoria Venegas EMNRD OCD-District II 811 S First St. Artesia NM 88210 Victoria.Venegas@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Ochoa Vidales, Cesar G < Cesar Ochoa@kindermorgan.com >

Sent: Wednesday, March 27, 2019 11:03 AM

To: Venegas, Victoria, EMNRD < Victoria. Venegas@state.nm.us >; Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us >

Cc: Hamlet, Robert, EMNRD < Robert. Hamlet@state.nm.us>

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

Hi Ms. Venegas,

Please find attached the Closure report for the Florida Station Release 2RP-5168 along with a copy of the requested grab samples from S-5 and S-11 locations at 3 feet depth. I Also included a table with all previous samples. Please let me know if you need any additional information.

Thank you,

Cesar G. Ochoa, P.E.

Pipeline Engineer- EHS 8645 Railroad Dr. El Paso, TX. 79904 Office (915) 587-3694, Cell (915) 345-6605, Fax (915) 587-3639



From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]

Sent: Friday, March 08, 2019 11:37 AM

To: Ochoa Vidales, Cesar G; Bratcher, Mike, EMNRD

Cc: Hamlet, Robert, EMNRD

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

[This email message was received from the Internet and came from outside of Kinder Morgan]

Hello Mr. Ochoa,

OCD has received your request for deferral for **2RP-5168**, thank you.

OCD understands that, due to infrastructure problems in the vicinity of the S-5 and S-11 sample area, limitations on excavation activities exist. However, based on the laboratory results, and considering that the MRO values for samples S-5 and S-11 are extremely high, the OCD requests two additional grab samples to be obtained, if feasible, one for S-5 and one for S-11, at 3 feet depth.

Please let me know if you have any question or concern.

Regards,

Victoria Venegas **EMNRD** OCD-District II 811 S First St. Artesia NM 88210

Victoria.Venegas@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Ochoa Vidales, Cesar G < Cesar Ochoa@kindermorgan.com >

Sent: Friday, February 22, 2019 3:31 PM

To: Venegas, Victoria, EMNRD < Victoria. Venegas @state.nm.us>; Bratcher, Mike, EMNRD < mike.bratcher @state.nm.us>

Cc: Hamlet, Robert, EMNRD < Robert. Hamlet@state.nm.us>

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

Ms. Venegas,

We conducted sampling as described on the remediation plan submitted on January 31, 2019. All the results are "non detect" at 1 ft. and 2 ft. below grade, except for the samples gathered between the compressor building and the exhaust pad (S—5 and S-11) as shown on the Soil Data Table Attached.

EPNG will proceed with the excavation and collection of 1 foot of soil as described on the remediation plan.

We are also submitting the attached request for 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 (see photo log). The contamination area is 16 feet by 2 foot and only the area between the exhaust

pad and the compressor building, everything else will be excavated and collected for disposal. The contamination will not cause an imminent risk to human health, the environment, or groundwater.

Please let me know if you have any questions or need additional information.

Sincerely,

Cesar G Ochoa

From: Venegas, Victoria, EMNRD [mailto:Victoria.Venegas@state.nm.us]

Sent: Friday, February 08, 2019 8:21 AM

To: Ochoa Vidales, Cesar G; Bratcher, Mike, EMNRD

Cc: Hamlet, Robert, EMNRD

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

[This email message was received from the Internet and came from outside of Kinder Morgan]

RE: Kinder Morgan (EPNG) * Florida Compressor Station * DOR: 11/5/2018

Mr. Ochoa,

OCD approves your requested 45 day extension to March 27, 2019, for the above-referenced release event. Thank you,

Victoria Venegas EMNRD OCD-District II 811 S First St. Artesia NM 88210

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Ochoa Vidales, Cesar G < Cesar Ochoa@kindermorgan.com >

Sent: Thursday, January 31, 2019 2:55 PM

To: Bratcher, Mike, EMNRD < mike.bratcher@state.nm.us >

Cc: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

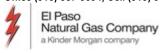
Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

Mr. Bratcher,

EPNG is requesting 45 day extension to complete the remediation of the release 2RP-5168. Please find attached the site characterization and remediation plan as well as laboratory results. If you have any questions or need additional information please let me know.

Thank you,

Cesar G. Ochoa, P.E. Pipeline Engineer- EHS 8645 Railroad Dr. El Paso, TX. 79904 Office (915) 587-3694, Cell (915) 345-6605, Fax (915) 587-3639



From: Bratcher, Mike, EMNRD [mailto:mike.bratcher@state.nm.us]

Sent: Thursday, January 17, 2019 9:27 AM

To: Ochoa Vidales, Cesar G

Cc: Hamlet, Robert, EMNRD; Venegas, Victoria, EMNRD

Subject: RE: [EXT] C-141 Release Notification - EPNG Florida Station

[This email message was received from the Internet and came from outside of Kinder Morgan]

RE: Kinder Morgan (EPNG) * Florida Compressor Station * DOR: 11/5/2018

Mr. Ochoa,

The OCD tracking number for this release is **2RP-5168**. The C-141 was entered late by OCD due to staffing issues.

Thank you,

Mike Bratcher NMOCD District 2 811 South First Street Artesia, NM 88210 575-748-1283 Ext 108

From: Ochoa Vidales, Cesar G < Cesar Ochoa@kindermorgan.com >

Sent: Monday, November 19, 2018 2:39 PM

To: Bratcher, Mike, EMNRD < <u>mike.bratcher@state.nm.us</u>> **Subject:** [EXT] C-141 Release Notification - EPNG Florida Station

Mr. Bratcher,

Please find attached the updated form C-141 Release Notification for El Paso Natural Gas Company- Florida Compressor Station. The notification was submitted on November 6, 2018 via USPS mail. I was asked today to update some of the information and resend via email. Please let me know if you have any questions or need additional information.

Regards,

Cesar G. Ochoa, P.E.

Pipeline Engineer- EHS 8645 Railroad Dr. El Paso, TX. 79904 Office (915) 587-3694, Cell (915) 345-6605, Fax (915) 587-3639

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