

From: [Long, Thomas](#)
To: [Smith, Cory, EMNRD](#)
Cc: [Stone, Brian](#); [Miller, Greg](#); [Powell, Brandon, EMNRD](#); [Fields, Jon](#)
Subject: [EXT] FW: Unauthorized release of Hydrostatic Test Fluid and Condensate
Date: Thursday, March 26, 2020 12:59:48 PM
Attachments: [Summary of Analytical Results.pdf](#)

Cory,

This email is an update to the response actions at the Lateral 2B-31 release site. As discussed on the phone, below is the language I was referencing in the regulations. I have attached an updated table referencing the older standards. I can also send the laboratory reports if you need them. The benzene standard of 10 ppb should still be applicable for this release.

20.6.2.3103

D. For purposes of application of the amended numeric standards for arsenic, cadmium, lead, combined radium-226 & radium-228; benzene, PCBs, carbon tetrachloride, EDC, PCE, TCE, ethylbenzene, methylene chloride, EDB, 1,1,2-trichloroethane and benzo-a-pyrene, to past and current water discharges (as of July 1, 2017), the new standards **will not become effective until July 1, 2020**. With regard to sites for which the secretary has approved an abatement completion report as of the effective date of this rule pursuant to 20.6.2.4112 NMAC, the amended numeric standards for arsenic, cadmium, lead, combined radium-226 & radium-228; benzene, PCBs, carbon tetrachloride, EDC, PCE, TCE, ethylbenzene, methylene chloride, EDB, 1,1,2-trichloroethane and benzo-a-pyrene shall not apply unless the secretary notifies the responsible person that the site is a source of these contaminants in ground water that pose a hazard to public health.

As of March 24, 2020, all contaminants of concern are below NMWQCC standards. The ecological assessment was completed by SME out of Durango, CO on March 25, 2020. Enterprise is awaiting completion of the assessment report and will include it in the final corrective action report.

If you have any questions, please call or email

Thomas J. Long
Senior Environmental Scientist
Enterprise Products Company
614 Reilly Ave.
Farmington, New Mexico 87401
505-599-2286 (office)
505-215-4727 (Cell)
tjlong@eprod.com



From: Long, Thomas
Sent: Friday, March 20, 2020 9:52 AM
To: 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Cc: Stone, Brian <bmstone@eprod.com>
Subject: RE: Unauthorized release of Hydrostatic Test Fluid and Condensate

Coy,

Please find the attached response letter for the unauthorized release of hydrostatic test fluid and condensate. This will also be mailed via the U.S mail. If you have any questions, please call or email.

Thomas J. Long
Senior Environmental Scientist
Enterprise Products Company
614 Reilly Ave.
Farmington, New Mexico 87401
505-599-2286 (office)
505-215-4727 (Cell)
tjlong@eprod.com



From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Wednesday, March 18, 2020 8:22 AM
To: Long, Thomas <tjlong@eprod.com>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Cc: Stone, Brian <bmstone@eprod.com>
Subject: RE: Unauthorized release of Hydrostatic Test Fluid and Condensate

Tom,

OCD approves the Extension request till Friday March 20, 2020.

Please keep me informed if anything changes thank you for your continued effort.

Cory

From: Long, Thomas <tjlong@eprod.com>
Sent: Wednesday, March 18, 2020 8:20 AM

To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Cc: Stone, Brian <bmstone@eprod.com>
Subject: [EXT] FW: Unauthorized release of Hydrostatic Test Fluid and Concensate

Cory,

We have not received all the analytical results from the contactors. Enterprise requests extension until Friday, March 20, 2020 to compile all the required data. Please acknowledge acceptance of this request. If you have any questions, please call or email.

Thomas J. Long
Senior Environmental Scientist
Enterprise Products Company
614 Reilly Ave.
Farmington, New Mexico 87401
505-599-2286 (office)
505-215-4727 (Cell)
tjlong@eprod.com



From: Long, Thomas
Sent: Tuesday, March 17, 2020 12:18 PM
To: 'Smith, Cory, EMNRD (Cory.Smith@state.nm.us)' <Cory.Smith@state.nm.us>
Cc: Stone, Brian <bmstone@eprod.com>; Brandon Powell (brandon.powell@state.nm.us) <brandon.powell@state.nm.us>
Subject: RE: Unauthorized release of Hydrostatic Test Fluid and Concensate

Cory/Brandon,

This is a update to the response action at the Lateral 2B-31 release site. We continued pumping water from the marsh/swamp through the weekend, yesterday and will through today. Envirotech collected another round of samples and we are awaiting analysis. As per our phone conversation earlier, with the recent events, and the recommended federal social distancing practices, Enterprise requests a 30 day extension to Items E-G of the Request for Confirmation of Compliance Letter dated March 12, 2020. Enterprise has already completed Items A-D from previous emails. Please acknowledge if the request is acceptable. If you have any questions, please call or email.

Thomas J. Long
Senior Environmental Scientist
Enterprise Products Company
614 Reilly Ave.
Farmington, New Mexico 87401

505-599-2286 (office)
505-215-4727 (Cell)
tjlong@eprod.com



From: Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Sent: Friday, March 13, 2020 10:39 AM
To: Long, Thomas <tjlong@eprod.com>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Miller, Greg <GEMiller@eprod.com>; Fields, Jon <JEFIELDS@eprod.com>; Stone, Brian <bmstone@eprod.com>
Subject: RE: Unauthorized release of Hydrostatic Test Fluid and Concensate

Thank you Tom. Please keep Cory as your main point of contact going forward.

Brandon Powell
Office: (505) 334-6178 ext. 111
"He who wishes to gain knowledge is wiser than he who thinks he has knowledge (unknown)"

From: Long, Thomas <tjlong@eprod.com>
Sent: Friday, March 13, 2020 10:36 AM
To: Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Cc: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Miller, Greg <GEMiller@eprod.com>; Fields, Jon <JEFIELDS@eprod.com>; Stone, Brian <bmstone@eprod.com>
Subject: [EXT] RE: Unauthorized release of Hydrostatic Test Fluid and Concensate

Brandon,

Please find the attached response letter for you Request for Confirmation Compliance with OCD Rule 19.12.29 NMAC. A hard copy is also being sent via U.S mail. In addition, Enterprise submitted the initial C-141 today, March 13, 2020, as required. Please feel free to call me if you have any questions, concerns or need additional information.

Sincerely,

Thomas J. Long
Senior Environmental Scientist
Enterprise Products Company
614 Reilly Ave.
Farmington, New Mexico 87401
505-599-2286 (office)
505-215-4727 (Cell)

tjlong@eprod.com



From: Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>
Sent: Thursday, March 12, 2020 2:29 PM
To: Long, Thomas <tjlong@eprod.com>; Miller, Greg <GEMiller@eprod.com>
Cc: Roose, Rebecca, NMENV <Rebecca.Roose@state.nm.us>; Lemon, Shelly, NMENV <Shelly.Lemon@state.nm.us>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Sandoval, Adrienne, EMNRD <Adrienne.Sandoval@state.nm.us>; Ames, Eric, EMNRD <Eric.Ames@state.nm.us>
Subject: Unauthorized release of Hydrostatic Test Fluid and Concensate

Good afternoon Tom,

Please see the attached letter and comply accordingly. If you have any questions please contact Cory Smith.

Thank You

Brandon Powell
District III Supervisor
New Mexico Oil Conservation
Office: (505) 334-6178 ext. 111

"He who wishes to gain knowledge is wiser than he who thinks he has knowledge (unknown)"

This message (including any attachments) is confidential and intended for a specific individual and purpose. If you are not the intended recipient, please notify the sender immediately and delete this message.

Table 1, Sumamry of Surface Water Analytical Results
Enterprise Products
Lateral 2B-31
Project #97057-1097
March 2020

NMWQCC (20.6.2.3103, NMAC) Contaminants of Concern	Sample Date	March 11, 2020				March 12, 2020	March 13, 2020							March 19, 2020						March 24, 2020					
	Pollutant Level	Sample Description																							
		West of Terminal	Terminal	West of Source	Source	TRC truck TK26	West of Terminal (Sample #2)	Terminal (Sample #2)	West of Source (Sample #2)	Source (Sample #2)	Downgradient 1	Downgradient 2	Upstream	West of Terminal (Sample #3)	Terminal (Sample #3)	West of Source (Sample #3)	Source (Sample #3)	Down Gradient 1 (Sample #2)	Down Gradient 2 (Sample #2)	West of Terminal (Sample #4)	Terminal (Sample #4)	West of Source (Sample #4)	Source (Sample #4)	Down Gradient 1 (Sample #3)	Down Gradient 2 (Sample #3)
		mg/L																							
		Volatile Organic Compounds (VOC) EPA Method 8260B																							
1,2-Dichloroethane (EDC)*	0.010	<0.001	<0.001	0.0311	<0.005	<0.002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.002	<0.002	<0.001	<0.001	<0.001	<0.001
1,2-Dichloropropane	0.005	0.00113	0.00138	0.0054	0.0148	<0.002	0.0011	0.0014	0.0026	0.0092	<0.001	<0.001	<0.002	<0.001	<0.001	<0.001	0.00108	<0.001	<0.001	<0.002	<0.002	<0.001	<0.001	<0.001	<0.001
1,4-Dichlorobenzene	0.075	<0.001	<0.001	<0.005	<0.005	<0.002	<0.001	<0.001	<0.005	<0.005	<0.001	<0.001	<0.002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.002	<0.002	<0.001	<0.001	<0.001	<0.001
Benzene*	0.010	0.0585	0.0911	1.15	0.662	0.0586	0.0105	0.0029	0.0378	0.0969	0.0033	0.0035	<0.002	0.00327	0.0088	0.00515	0.0115	<0.001	<0.001	<0.002	0.00600	0.00380	0.00649	<0.001	<0.001
Ethylbenzene*	0.750	0.0121	0.0156	0.100	0.192	0.00914	0.0045	0.0156	0.0158	0.0425	0.0011	0.0017	<0.002	0.00213	0.00506	0.00354	0.00683	<0.001	<0.001	0.00360	0.00360	0.00228	0.00423	<0.001	<0.001
Toluene	1.00	0.116	0.151	2.78	3.24	0.149	0.0542	0.0872	0.1890	0.4000	0.0064	0.0071	<0.002	0.0216	0.0647	0.0401	0.090	<0.001	<0.001	0.00540	0.0459	0.0297	0.0542	<0.001	<0.001
Xylenes (Total)	0.620	0.143	0.18	1.1	2.14	0.0743	0.5250	0.1490	0.1750	0.3720	0.0160	0.0274	<0.002	0.0262	0.0598	0.0412	0.0784	0.00261	<0.001	0.0103	0.0464	0.0293	0.0505	<0.001	<0.001
Polynuclear Aromatic Hydrocarbons (PAH) EPA Method 8260 B and 8270C																									
Naphthalene	0.030	<0.005	<0.005	0.00203	0.00652	<0.001	<0.005	<0.010	<0.005	<0.005	<0.005	<0.010	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.010	<0.010	<0.005	<0.005	<0.005	<0.005
RCRA 8 Metals (EPA Method 6010C/7471B)**																									
Barium	2.00	<0.250	<0.250	<0.250	<0.250	<0.250	NA	NA	NA	NA	<0.250	<0.250	0.2710	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total Mercury	0.002	<0.0002	<0.002	0.000203	0.000858	0.0364	NA	NA	NA	NA	<0.0002	<0.002	<0.0002	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TDS AnionNA (EPA Method 300.0/9056A)																									
Chloride	250	10.9	10.8	14.7	11.2	20	NA	NA	NA	NA	10.90	10.90	13.10	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
TDS	1,000	2,240	2,190	1,950	2,140	215	NA	NA	NA	NA	2,110	2,140	2,060	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sulfate	600	1,200	1,190	1,070	1,150	45.8	NA	NA	NA	NA	1,130	1,160	1,180	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nitrite	1.00	<1.25	<1.25	<1.25	<1.25	<1.25	NA	NA	NA	NA	<1.25	<1.25	<1.25	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoride	1.60	<1.25	<1.25	<1.25	<1.25	<1.25	NA	NA	NA	NA	<1.25	<1.25	<1.25	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nitrate	10.0	<1.25	<1.25	<1.25	<1.25	<1.25	NA	NA	NA	NA	<1.25	<1.25	<1.25	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

BOLD: above laboratory detection limits; RED: above applicable regulatory standards * Note: new pollutant level in 20.6.2.3103 does not go into effect until July 1, 2020

** Pollutant Levels are based on the dissolved portion of the contaminant with the exception of Mercury, note metals were analyzed as total; NA: Not Analyzed