

From: [Yu, Olivia, EMNRD](#)
To: ["Slade, Rose"](#)
Subject: RE: Trunk M (RP#4500) ETC Field Services
Date: Wednesday, January 3, 2018 3:43:00 PM
Attachments: approved_1RP4500_Trunk M Remediation Summary and Risk-Based Closure Request_final.pdf

Ms. Slade:

Happy new year! Thank you for the concise summary of the corrective actions regarding 1RP-4500. Please see attachment for your records.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

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 ground water, 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, local laws and/or regulations.

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Thursday, December 21, 2017 9:32 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Trunk M (RP#4500) ETC Field Services

Good morning Ms. Yu,

Please find below a brief summary of ETC remediation site at the Trunk M (RP#4500). Ms. Yu, this site is one that we briefly discussed in your office back on October 19th. This release site is the one that cannot be fully closed per NMOCD regulations until TOA (time of abandonment) of the ETC high pressure pipeline.

I wanted to submit to you the Risk-Based Closure Report for your records and for the OCD imaging page stating we do have an approved ETC Risk-Based Closure Request on file for this site from the OCD Hobbs District Office.

If you have any questions, concerns, or require any additional information please let me know.

1. **Trunk M (IRP#4500)**

- a. October 28, 2016, ETC discovered a release of hydrocarbons had occurred from a

- twenty (20) inch steel pipeline. The cause of the release was attributed to external corrosion which caused a segment of the steel pipeline to fail.
- b. December 6, 2016, Terracon, on behalf of ETC performed an initial site assessment of the release site. During the site assessment Terracon representative collected eight (8) soil samples from the open excavation at the release site.
 - c. May 11, 2017, TRC on behalf of ETC collected additional soil samples for laboratory analysis. The samples collected were analyzed for BTEX, TPH, & chlorides. Approximately five (5) feet west and parallel of the west wall of the open excavation, is an ETC sixteen (16) inch High Pressure (940 PSI) natural gas steel pipeline heading in a north to south direction. Due to safety concerns, horizontal delineation was not conducted within approximately eight (8) feet of the west wall of the open excavation.
 - d. May 13, 2017, TRC collected soil samples from the floor and the original trenches. The soil samples collected were analyzed for BTEX, TPH, and chlorides. Soil samples were also collected from a visibly stained area which is located on the west side wall of the open excavation approximately five (5) feet bgs, eighty (80) feet long, and parallel to the ETC High Pressure steel natural gas pipeline.
 - e. June 21 and 22, 2017, based on laboratory analytical results and visibly stained areas, TRC conducted additional delineation activities at the Release Site.
 - f. July 26, 2017, an ETC representative verbally requested and received permission from the landowner to leave in-situ the impacted material adjacent to the ETC High Pressure steel natural gas pipeline.
 - g. August 1, 2017, a representative of ETC submitted the "Soil Investigation Summary and Proposed Remediation Workplan" for NMOCD consideration. The workplan summarized remedial activities to date and detailed a closure strategy designed to progress the release site toward an NMOCD approved closure status.
 - h. August 7, 2017, ETC and TRC met with the NMOCD to discuss the workplan and received NMOCD approval to proceed with the activities outlined in the workplan.
 - i. August 8, 2017, TRC commenced excavation activities. Due to safety concerns, no excavation activities were conducted on the west side wall of the open excavation due to the presence of the ETC High Pressure steel natural gas line.
 - j. August 17, 18, & 21, 2017, soil samples were collected from the floor and sidewalls of the excavated area. The soil samples were submitted to the laboratory and analyzed for concentrations of TPH, BTEX, and chloride concentrations.
 - k. September 9, 2017, an ETC representative submitted the Soil Remediation Summary and Backfill Request to the NMOCD for consideration.
 - l. October 10, 2017, TRC commenced backfilling activities at the Trunk M Release Site. The excavated area was backfilled with locally obtained, non-impacted soil.
 - m. October 17 through 20, 2017, TRC transported approximately 708 cubic yards of impacted soil to Sundance Services.
 - n. The impacted soil located in the pipeline right of way of the ETC High Pressure Steel Gas Pipeline was not excavated due to safety concerns. The impacted soil will be excavated and removed at the time of abandonment of the ETC sixteen inch High Pressure Steel Gas Pipeline.

Respectfully,

Rose Slade



Rose L. Slade

Senior Environmental Specialist,
Waste, Water, Remediation
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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

From: [Yu, Olivia, EMNRD](#)
To: [Slade, Rose](#)
Subject: RE: Backfill request Trunk M (IRP#4500)
Date: Tuesday, October 10, 2017 11:16:00 AM

Ms. Slade:

Thank you for the acknowledgement regarding the area specifically for deferral for 1RP-4500.

Confirmed for October 19, 2017 at 9:30 am MST.

Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Tuesday, October 10, 2017 11:03 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Backfill request Trunk M (IRP#4500)

Good morning Ms. Yu,

You are welcome for the updated map.

In regards to the decision regarding the impacted soil within the 5 feet of the ETC high pressure pipeline, as per our meeting with you on 8/7/17 we discussed leaving the impacted soil beneath the high pressure line in place and remediated at the time of abandonment of the High Pressure Line. We received verbal approval from NMOCD and the Landowner to leave the impacted soils beneath the High Pressure Pipeline and remediate at the time of abandonment as per our approved Soil Investigation and Remediation Workplan due to safety concerns of the integrity of the pipeline.

ETC understands that a full closure to IRP-4500 will not be granted due to the impacted area within the 5 feet of the ETC High Pressure Pipeline. This section will be deferred for further delineation and remediation at retrofit or time of abandonment in our "Proposed Risk Based Closure Report" that will be submitted for approval to the NMOCD Hobbs District Office.

Meeting on October 19, 2017 @ 9:30 AM (Mountain time) work for you?

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

Respectfully,
Rose Slade

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Tuesday, October 10, 2017 9:15 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Subject: RE: Backfill request Trunk M (IRP#4500)

Good morning Ms. Slade:

Thank you for the updated Figure 3 for 1RP-4500. NMOCD grants backfill approval for the excavated area. Please see attachment for your records.

What is the decision regarding the impacted soil within 5 ft. of the ETC high pressure pipeline?

RE: meeting. I am available on October 19, 2017.

Thanks,
Olivia

From: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]

Sent: Monday, October 9, 2017 2:50 PM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Subject: RE: Backfill request Trunk M (IRP#4500)

Ms. Yu,

I am doing well thank you for asking. Hope you are having a good day.

After speaking with my consultant about this project, It appears that the mapping/drafting person for TRC made a mistake on the Soil Sample locations Map. The baseline sampled that was pulled at 4 foot had failed, but it was collected prior to any excavation activities. The soil between the 4 foot baseline and the 9 foot baseline has since then been excavated out of the affected area and the impacted soils are currently stockpiled on poly plastic and waiting for approval for disposal. Please accept our apologies for that oversight.

I have attached a revised map with the sample points where the confirmation samples were pulled.

If you are not comfortable with this revision, we can go back out and re-sample if you would prefer us to do that, we certainly can re-sample that wouldn't be a problem.

I also wanted to check to see if you have any availability for a meeting with TRC and I on either October 18th or October 19th to discuss closure on the A-14 remediation projects either morning or afternoon will work for us either day.

Please let me know if you have any other questions or concerns, or require any additional information.

Respectfully,



Rose L. Slade

Senior Environmental Specialist,
Waste, Water, Remediation
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From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]

Sent: Thursday, October 5, 2017 1:45 PM

To: Slade, Rose <Rose.Slade@energytransfer.com>

Subject: RE: Backfill request Trunk M (IRP#4500)

Ms. Slade:

Thank you. I trust you are in good health as well.

Please address these concerns regarding the remediation report for 1RP-4500:

- Did Baseline-4 fall within the 4 ft. or 9 ft. excavated area? It is somewhat unclear comparing the delineation sample locations in Figure 2 with the excavated areas outlined in Figure 3.
- Please be advised that full closure to 1RP-4500 will not be granted due to the impacted area within 5 ft. of the ETC high pressure pipeline. This section will be deferred for further delineation and remediation at retrofit or abandonment.

Thanks,
Olivia

From: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]

Sent: Thursday, October 5, 2017 9:06 AM

To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

Subject: FW: Backfill request Trunk M (IRP#4500)

Good morning Ms. Yu,

Hope you are doing well.

I just wanted to check in with you to see if you've had an opportunity to review the backfill request for the Trunk M (IRP#4500). This is the one where both the landowner and NMOCD gave ETC

permission to leave in-situ the impacted material adjacent to the ETC High Pressure steel natural gas pipeline located approximately five (5) feet bgs and eighty (80) feet in length on the west sidewall of the excavation. ETC has recently achieved vertical and horizontal delineation of this release site.

ETC is requesting approval from the NMOCD to backfill the Trunk M Release Site (IRP#4500) and proposes the following field activities designed to advance the Trunk M Release Site towards NMOCD closure status:

- Pending NMOCD approval, ETC will transport the excavated soil under manifest to an NMOCD approved disposal facility.
- On completion of transport and disposal of the excavated soil, the excavated area will be backfilled with locally purchased non-impacted “like” soil. In addition, the backfilled area will be contoured to fit the surrounding area and reseeded with vegetation approved by the landowner.
- Prepare and submit a “Remediation Summary and Site Closure Request” to the NMOCD.

Thank you so much for your time Ms. Yu, if you need additional information or have any questions, please feel to contact me via email/phone at any time.

Hope you have a great day!

Respectfully,



Rose L. Slade

Senior Environmental Specialist,
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From: Slade, Rose

Sent: Monday, September 25, 2017 3:32 PM

To: 'Yu, Olivia, EMNRD' <Olivia.Yu@state.nm.us>

Subject: Backfill request Trunk M (IRP#4500)

Good day Olivia,

Please find attached the Remediation Summary and Backfill Request for the Trunk M (IRP#4500). ETC Field Services is requesting approval to backfill the Trunk M Release site.

If you have any questions or require additional information, please let me know.

Hope you have a great day,

Respectfully,
Rose Slade



Rose L. Slade

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