From:	Yu, Olivia, EMNRD
To:	<u>"Gough, Robert"; Shelly Tucker (stucker@blm.gov)</u>
Cc:	Blair, Yvonne B; Boydston, Tom R; Payne, Dylan W; Stanfield, David K
Subject:	RE: DCP booster station lube oil release - Confirmation Report and Final C-141
Date:	Wednesday, January 3, 2018 2:45:00 PM
Attachments:	approved_SHM 12_21_17_C-141.final-signed.pdf
	approved DCP South Hat Mesa 1RP-4803 Confirmation of Corrective Actions FINAL.pdf

Mr. Gough:

Backfill approval granted for 1RP-4803. Like approval from BLM required.

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-4803** closed. This determination by the Oil Conservation Division does not relieve Operator of responsibility should future information indicate a threat to ground water, surface water, human health, or the environment. Furthermore, it does not relieve Operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 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: Gough, Robert [mailto:RGough@dcpmidstream.com]
Sent: Thursday, December 21, 2017 2:26 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Blair, Yvonne B <YBBlair@dcpmidstream.com>; Boydston, Tom R <TRBoydston@dcpmidstream.com>; Payne, Dylan W
>DWPayne@dcpmidstream.com>; Stanfield, David K <DXStanfield@dcpmidstream.com>
Subject: RE: DCP booster station lube oil release - Confirmation Report and Final C-141

Good afternoon Ms. Yu,

Please find attached the Confirmation of Corrective Actions for the South Hat Mesa Lube Oil release. The cleanup and sampling was performed as discussed in the work plan below. Analysis of samples indicates the soils are below NM OCD thresholds.

We are preparing to backfill the location with limestone once confirmation is received from you.

I have also attached a final C-141 form.

Please let me know any questions or comments.

Happy Holidays,

Rob

From: Gough, Robert Sent: Friday, September 08, 2017 8:01 AM To: 'Yu, Olivia, EMNRD' <<u>Olivia.Yu@state.nm.us</u>> Thank you Ms. Yu for the clarification. Have a great weekend! Rob

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

Sent: Thursday, September 07, 2017 9:41 AM

To: Gough, Robert <<u>RGough@dcpmidstream.com</u>>

Cc: Conder, Haskell P <<u>HConder@dcpmidstream.com</u>>; Blair, Yvonne B <<u>YBBlair@dcpmidstream.com</u>>; <u>stucker@blm.gov</u> **Subject:** RE: DCP booster station lube oil release

Mr. Gough:

Foremost, NMOCD sincerely appreciates your compliance and rapid response in addressing this release. A summary of our conversation this morning regarding 1RP-4803 about the path forward:

- Clarification re: spill volume. At any time the volume of release is >= 5 bbls, regardless of whether the fluid was contained or impacted surface, NMOCD must be notified and a C-141 submitted per NMAC 19.15.29. The only exception, in which a release characterization and remediation plan is not necessary, is if the release occurred in a lined secondary containment.
- NMOCD does not preclude the Responsible Operator from immediate corrective actions of the release, such as removal of impacted soil and vacuuming of free liquids.
- Due to the prompt response of the Responsible Operator, NMOCD determined that complete delineation and remediation of the release are not necessary. However, these are the information required for confirmation of corrective actions:
 - Scaled map with the release area outlined and confirmation sample location marked. Please mark the GPS coordinates of the release point.
 - 2 confirmation soil samples will be sent to an accredited laboratory for BTEX, TPH, and chloride analyses, using the methods specified in the directive appended to the reviewed initial C-141: 1 discrete sample from within the release area and 1 will be a composite of soil from the 4 cardinal directions of the excavated area.
 - Photo documentation of the release pre- and post- remediation, optimally geo-referenced and dated.
 - The proposed remediation is by excavation.
- The Responsible Operator will submit a short summary with the above documentation within 90 days.

Please be advised that if the 2 confirmation samples are not within permissible levels for BTEX, TPH, and chlorides, then complete delineation and remediation may be required.

Please inform if there are any missing points or additional clarification is required.

Thanks, Olivia

 From: Gough, Robert [mailto:RGough@dcpmidstream.com]

 Sent: Wednesday, September 6, 2017 3:33 PM

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

 Cc: Conder, Haskell P <<u>HConder@dcpmidstream.com</u>>; Blair, Yvonne B <<u>YBBlair@dcpmidstream.com</u>>

 Subject: RE: DCP booster station lube oil release

Good afternoon Ms. Yu,

The Booster location is South Hat Mesa. This was a lube oil release and contractors were onsite to immediately remove free liquids. I would appreciate the opportunity to discuss the work plan in greater detail. When is the best time to reach you?

Thank you,

Rob Gough, PE Senior Environmental Engineer

Eunice Gas Plant & Field

DCP Midstream, LP 10 Desta Drive, Suite 600 West Midland, TX 79705 Ofc: 432-620-4166 Cell: 432-634-2589 e-mail: rgough@dcpmidstream.com



Know what's below-Call before you dig! 8-1-1

Rob

 From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

 Sent: Wednesday, September 06, 2017 3:58 PM

 To: Gough, Robert < RGough@dcpmidstream.com>

 Cc: Conder, Haskell P < HConder@dcpmidstream.com>; Blair, Yvonne B < YBBlair@dcpmidstream.com>

 Subject: DCP booster station lube oil release

Dear Mr. Gough:

Please note that the name of the booster station was not provided and that the C-141 is accepted as initial only.

Also, please be advised that additional documentation will be required (e.g., photos and confirmation samples).

The 1RP for this incident is

Please note that a release characterization/delineation workplan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

Thanks,

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

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