

From: [Oberding, Tomas, EMNRD](#)
To: [Yu, Olivia, EMNRD](#)
Subject: FW: ETC's Jal #3 Field Scrubbers Proposed Closure Strategy
Date: Monday, October 30, 2017 10:55:21 AM

Have found this one and one other. Will keep looking.

Tomáš 'Doc' Oberding PhD
Hydrologist, Adv-District 1
Oil Conservation Division, EMNRD
(505) 476-3403
E-Mail: tomas.oberding@state.nm.us
一期一会

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: Wednesday, August 16, 2017 1:07 PM
To: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Cc: Lowry, Joel <JLowry@trcsolutions.com>
Subject: RE: ETC's Jal #3 Field Scrubbers Proposed Closure Strategy

Good afternoon sir,

So good to hear from you, it's been a while. Hope you are doing well. We understand how busy your schedule is and we truly appreciate you in taking the time to reach out to us on these projects.

I hope you have a great rest of the day sir, and we will keep in touch with you of our findings next week on these projects.

Respectfully,
Rose Slade

From: Oberding, Tomas, EMNRD [<mailto:Tomas.Oberding@state.nm.us>]
Sent: Wednesday, August 16, 2017 1:37 PM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Cc: Lowry, Joel <JLowry@trcsolutions.com>
Subject: RE: ETC's Jal #3 Field Scrubbers Proposed Closure Strategy

Aloha Rose and Joel,

Mahalo for your patience.

The OCD approves the workplan as detailed. Please keep us informed, and please stay safe.

Mahalo

-Doc

Tomáš 'Doc' Oberding PhD
Hydrologist, Adv-District 1
Oil Conservation Division, EMNRD
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From: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]
Sent: Friday, August 4, 2017 10:06 AM
To: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>
Cc: Lowry, Joel <JLowry@trcsolutions.com>
Subject: ETC's Jal #3 Field Scrubbers Proposed Closure Strategy

Dr. Oberding,

Good morning sir, I hope you that you are doing well this Friday morning.

Please find attached the "Proposed Closure Strategy Report" for the Energy Transfer's Jal #3 Field Scrubbers. These below ground tanks are the last two (2) of the BGT's to be closed out as part of our ongoing project from the Jal #3 Plant.

These two BGT's are located just west a of the ETC Jal #3 Plant. The two (2) Field Scrubbers Dump Tanks can be describes as steel, 210 bbl tanks that were utilized to contain pipeline liquids. At the current time, these two below ground tanks have been taken out of service and removal of all liquids is being conducted.

ETC Field Services, with your approval would like to remove these below ground tanks the week of August 21st. We are scheduled to remove the tanks beginning on August 22, 2017.

ETC request the following proposal closure strategy: (Basically the same as we did on the Classifier Tanks at our Jal #3 Plant, just recently sir).

1. Removal of the remaining contents of each of the BGT's and disposing of the contents at an NMOCD permitted facility.
2. Utilization of a crane and/or mechanical equipment to remove the BGT's from their current location.
3. Upon removal of the BGT's, a visual inspection of the tanks will be conducted to look for evidence of failure. In addition, adjacent soils will be visually inspected for stains or excessive moisture. In the event evidence of a release are identified, the potential release would be

investigated and reported as necessary.

4. Upon removing the BGT's, one (1) 5-point composite soil sample will be collected from soil beneath each of the former tank(s) locations and submitted to the laboratory for analysis of BTEX, TPH, and chloride. Laboratory analysis will be provided to the NMOCD.
5. In the event affected soils do exhibit BTEX, TPH, and/or chlorides concentrations above the Closure Criteria for Soils beneath the BGT's, Drying Associated with Closed-Loop Systems and Pits where Contents are Removed for sites where the depth below the bottom of pit to groundwater is greater than 100 ft. are discovered, a Delineation Plan and/or Work-Plan will be prepared and submitted to the NMOCD for approval.
6. Upon receiving NMOCD permission and completion of the above-mentioned field activities, ETC will prepare and submit a Final C-144 and Closure Report detailing field activities and laboratory analytical results from confirmation soil samples.

If you have any questions, or if additional information is required, please feel free to call Joel or myself.

Respectfully,

Rose Slade



Rose L. Slade

Senior Environmental Specialist,
Waste, Water, Remediation
Energy Transfer Partners

O: 210.403.6525

C: 432.940.5147