

From: [Yu, Olivia, EMNRD](#)
To: ["Slade, Rose"](#)
Subject: RE: 4-Inch Lateral (1RP# 2904)
Date: Monday, February 19, 2018 1:30:00 PM
Attachments: approved_1RP2904_Final C-141 4-inch Lateral .pdf
approved_1RP2904_Closure Request.pdf

Dear Ms. Slade:

The available information indicates **OPERATOR** has met the requirements of 19.15.29 NMAC and no further corrective action is required. NMOCD considers **1RP-2904** 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
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: Friday, February 16, 2018 9:01 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: 4-Inch Lateral (1RP# 2904)

Good morning Ms. Yu,

I believe I may have made an error on the date on the bullet point #16. The date is November 19, 2015 as you can see in the email attached (named 4 inch lateral approval) where Mr. Keyes approved the Remediation Summary and Proposed Risk-Based Site Closure Strategy. He approved this plan on that date. I don't know where I got November 23, 2015 from, I must have been in Thanksgiving dinner mode. I apologized for that error.

On bullet point #22 please find the NMOCD Closure Approval from Mr. Keyes dated March 7, 2016 attached for reference.

I hope this is what you were needing, and if you need any other data or have any questions or concerns, please let me know. I'll do my best to assist.

Hope you have a great day & weekend.

Sincerely,
Rose

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, February 16, 2018 9:22 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Subject: RE: 4-Inch Lateral (1RP# 2904)

Good morning Ms. Slade:

Do you have the email correspondence from November 23, 2015 (#16) and March 7, 2016 (#22) as indicated below?

Thanks,
Olivia

From: Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]
Sent: Monday, January 22, 2018 8:16 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: 4-Inch Lateral (1RP# 2904)

Good morning Ms. Yu,

Please find attached per your request a summary timeline of field activities and events that took place at the 4-inch Lateral (2/18/13) Release Site, also included are the documents we discussed in our meeting on January 9, 2018.

- 1.. On February 18, 2013, ETC Field Services, LLC (ETC), formerly Southern Union Gas Services, LLC (SUGS), discovered an approximately twenty-five (25) barrel (bbl) release that had occurred on a four (4) inch lateral pipeline located northeast on Jal in Lea County, New Mexico. On February 18, 2013, the release was reported to the New Mexico Oil Conservation Division (NMOCD) District 1 Office in Hobbs, New Mexico.
2. On March 19, 2013, following initial response activities, delineation and excavation of the impacted soil began at the Release Site.
 - a. Initial response activities included, placing a temporary clamp on the pipeline to mitigate the release, as well as, excavating the heavily saturated soil associated with the release and

staging the impacted soil and transporting it to an NMOCD-approved disposal facility.

- b. Following initial response activities, horizontal and vertical delineation activities commenced. Which included a soil sample (RP Baseline) was collected beneath the release point. The soil submitted was to the laboratory and was analyzed for concentrations of benzene, toluene, ethylbenzene, and xylene (BTEX) using EPA Method SWE 846-802 1 b. In addition, a five (5) point composite stockpile soil sample (SP Baseline) were also collected from a soil stockpile adjacent to the release point.
3. On March 21, 2013, a trench was advanced adjacent to the release point to investigate the vertical depth of the impact at the release point. Based on the analytical results of the investigation trench, vertical delineation of the Release Site could not be achieved using an excavator. Horizontal delineation of the Release Site continued to the north, south and west of the release point. Impacted soil from the surface to four (4) feet bgs was excavated and stockpiled onsite. An investigation trench was utilized to delineate impacted soil at depths greater than four (4) feet bgs. Soil adjacent to, and northeast of, the release point was left in-situ to allow for mobilization of a drilling rig to advance a soil boring.
4. On March 22, 2013, two (2) soil samples were collected from the west sidewall of the excavation and delineation trench. The soil samples were submitted to the lab for analytical results. Based on the analytical results, no additional excavation was warranted on the west sidewall of the excavation.
5. On April 2, 2013, two (2) soil samples were collected from the south sidewall of the excavation. The soil samples were submitted to the laboratory for analytical results. Based on the analytical results, the delineation trench was extended approximately ten (10) feet to the south and resampled. Soil excavated from the delineation trench was added to the existing soil stockpile. Delineation of the south sidewall continued based on the analytical results, additional soil samples were collected from the south sidewall and submitted to the lab for analytical results. Based on the analytical results of soil samples submitted to the laboratory the southernmost horizontal extent of impact was delineated.
6. On April 3, 2013, delineation of the northernmost extent of impact commenced, soil samples were submitted to the laboratory. Based on the analytical results the delineation trench was extended approximately five (5) feet to the northwest and resampled. Soil excavated from the trench was added to the existing soil stockpile.
7. On April 5, 2013, two (2) soil samples were collected and submitted to the laboratory. Based on the analytical results the delineation trench was advanced thirty (30) feet to the east.
8. On April 9, 2013, two (2) soil samples were collected and submitted to the laboratory. Based on the analytical results of soil samples submitted to the laboratory the easternmost extent of horizontal impact at the south end of the Release Site appears to be delineated.
9. During this time approximately 1,600 cubic yards (cy) of impacted soil was excavated and stockpiled on-site, pending final disposition. The final dimensions of the excavation were

approximately two hundred fifty (250) feet in length, ranged from approximately twenty-five (25) to one hundred (100) feet in width, and varied in depth from (3) feet to fifteen (15) feet.

10. Following excavation and delineation activities, the delineation trenches were backfilled as a safety precaution.

11. On December 4, 2013, representatives of NOVA and the NMOCD, met in the NMOCD Hobbs 1 District Office and discussed a closure strategy for the Release Site. The NMOCD representative requested three (3) soil borings be advanced at the Release Site to adequately delineate the vertical extent of chloride impact at the Release Site.

12. On an unknown date, the existing excavation was inadvertently backfilled with soil by another contractor. The analytical status of the backfill soil is unknown, but likely included the approximately 1,600 cy of impacted soil stockpiled on-site, awaiting final disposition.

13. On February 19, 2014, three (3) soil borings were advanced at the Release Site. The soil borings were advanced until chloride field tests, visual and olfactory evidence indicated benzene, BTEX, TPH, and chloride concentrations were less than NMOCD regulatory guidelines for the Release Site. Soil samples were collected at five (5) foot drilling intervals and field screened using a Photo-Ionization Detector (PID) and chloride field test kit. Selected soil samples were submitted to the laboratory for determination of concentrations of benzene, toluene, ethyl-benzene and xylene (BTEX), total petroleum hydrocarbon (TPH), and chlorides using EPA SW-846 8021, 8015M, and E 300.1, respectively.

14. On March 18, 2014, representatives of NOVA and Regency met with NMOCD Hobbs District Office and discussed a closure strategy for the Release Site. The NMOCD representative reviewed the analytical results of the soil samples collected during delineation activities and verbally approved Regency's request to utilize a Risk-Based Closure strategy at the 4-Inch Lateral (2/18/13) Release Site. The NMOCD representative approved the excavation of the Release Site to approximately twelve (12) feet bgs. In addition, the NMOCD approved the installation of a twenty (20) millimeter (mil) polyethylene liner at approximately twelve (12) feet bgs.

15. On November 19, 2015, representatives of ETC (formally SUGS and Regency) and TRC (formerly NOVA) met with an NMOCD representative and submitted the "Remediation Summary and Proposed Risk-Based Closure Strategy" (Workplan) for NMOCD consideration. The workplan summarized remedial activities to date and detailed a closure strategy designed to progress the Release Site toward and NMOCD approval and closure status. (Report attached)

16. On November 23, 2015, ETC received written (email attached) NMOCD approval to proceed with the activities outlined in the workplan.

17. On December 3, 2015, TRC mobilized heavy equipment to the Release Site and commenced excavation activities from the release point to the east and north. Chloride field screening was utilized to guide the excavation activities. Excavated soil was stockpiled to the south and the north of the excavation, pending final disposition of the soil.

18. On December 22 and 23, 2015, a backhoe was utilized to collect six (6) soil samples to the north of the release site, outside of the release margins, in an effort to investigate potential off-site contributors. Soil samples were submitted to the laboratory for analysis of chloride concentrations, which were determined to be above the NMOCD regulatory guidelines.

19. On December 23, 2015, based on the above findings, ETC ceased further excavation activities at the Release Site. Review of laboratory of laboratory analytical results and historical documents on the NMOCD imaging system suggests the presence of a potential off-site contributor, likely associated with an inferred historical risk-based closure to the north and geographically upslope of the 4-Inch Lateral (2/18/13) Release Site.

20. Utilizing the NMOCD imaging system, a potential off-site contributor was identified directly north and geographically upslope the Release Site in Unit Letter "P", Section 8, Township 25 South, Range 37 East. Documents contained on the NMOCD imaging system indicated (5) soil samples collected on behalf of the potential off-site contributor on January 18, 2007. (Documentation attached)

21. On January 13, 2016, representatives of ETC and TRC met with NMOCD representatives in the NMOCD Hobbs District Office and requested the NMOCD research and investigate the potential off-site contributions to the chloride impact at the 4-inch Lateral (2/18/13) Release Site.

22. On March 7, 2016, a former NMOCD Environmental Representative, granted ETC permission to backfill the existing excavation with the excavated soil close the site without condition. (Email attached).

23. Please find attached photos of historical images of the Release Site.

24. On March 15, 2016, backfilling of the Release Site was completed. ETC requested a second former NMOCD Environmental Representative to grant closure to the 4-Inch Lateral (2/18/13) incident which occurred on February 18, 2013; the NMOCD Environmental Representative verbally gave ETC approval for closure of this Release Site.

25. On January 9, 2018, representative of ETC and TRC met with a NMOCD representative and submitted all the data on the 4-Inch Lateral Release (2/18/13). All parties conducted a site visit of the Release Site.

26. Please find attached the Remediation Summary and Site Closure Request for the 4-Inch Lateral (2/18/13) Release that was submitted to the NMOCD Hobbs District Office on May 5, 2015. (Documentation attached)

27. Also, please find attached the final C-141 for ETC. (Documentation attached)

Thank you Ms. Yu for your patience and for meeting with us about this Release Site. If you have any questions or concerns, or require any additional information, please do not hesitate to let me know.

Respectfully,
Rose Slade



Rose L. Slade

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