

From: Fred Holmes
To: [Yu, Olivia, EMNRD](#)
Cc: [Brannon Norton](#); ["Wally McNeil"](#); ["Shane Estep"](#)
Subject: Stakeholder Midstream 1RP-4931 Update
Date: Monday, February 5, 2018 1:07:38 PM

Olivia:

I have all of my samples cleared except for one sidewall in the shallow part of the excavation. I am having this completed this week and will let you know as soon as I have more information.

Thank you for all of your assistance.

Fred Holmes
Etech Environmental & Safety Solutions, Inc.
P.O. Box 62228
Midland, Texas 79711
Phone: 432-631-3757
E-mail: fred@etechenvironment.com

CONFIDENTIAL

This e-mail message, including any attachments, is intended solely for the individual(s) named above. It contains confidential and/or proprietary information. If you are not the intended recipient, please do not read, copy or distribute it or any information it contains. Please immediately notify the sender by return mail and delete it.

From: [Yu, Olivia, EMNRD](#)
To: ["Fred Holmes"](#)
Cc: ["Brannon Norton"](#); ["Rory Gray"](#); ["Kevin Roberts"](#); ["Wade Ingle"](#); shane@etechenv.com; ["Ted Lilly"](#); ["Tom Cunningham"](#); ["Mike Gray"](#); jroberts@stakeholderms.com; ccraycraft@setecmidstream.com; ["Wally McNeil"](#); ["Kati Howard"](#)
Subject: RE: Stakeholder Midstream Line Leak Update Analysis
Date: Wednesday, January 24, 2018 7:54:00 AM

Good morning Mr. Holmes:

Thank you for the below update for 1RP-4931. NMOCD approves of the proposed course of action and look forward to receipt of a complete delineation and remediation report.

Olivia

From: Fred Holmes [mailto:fred@etechenv.com]
Sent: Friday, January 19, 2018 7:52 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Brannon Norton' <Brannon.Norton@flatrockenergy.net>; 'Rory Gray' <rgray@stakeholderms.com>; 'Kevin Roberts' <kevin.roberts@flatrockenergy.net>; 'Wade Ingle' <wade.ingle@flatrockenergy.net>; shane@etechenv.com; 'Ted Lilly' <ted.lilly@flatrockenergy.net>; 'Tom Cunningham' <tcunningham@stakeholderms.com>; 'Mike Gray' <mgray@stakeholderms.com>; jroberts@stakeholderms.com; ccraycraft@setecmidstream.com; 'Wally McNeil' <wally@etechenv.com>; 'Kati Howard' <kati@etechenv.com>
Subject: RE: Stakeholder Midstream Line Leak Update Analysis

Olivia,

Attached are the established sampling points. Areas of concern are:

1. Release Point: This area is to 8' vertical and needs bottom and sidewall samples after cleanout.
2. East Section and SE Sidewall: Cleanout of the center of the east area where the hydrocarbon had pooled and were partially excavated, then sample. As well as the corresponding sidewall on the south side of this area.
3. NW Sidewall: Cleanout of the north side of the west end that needed additional excavation and sample.

All other areas had passed prior to the introduction of the water at levels below 200 mg/kg for TPH. The chlorides that were in the soil prior to the impact were Non-Detect to 51.7 mg/kg.

Thank you again for all of your assistance. If I can do anything else for you, please let me know.

Sincerely,

Fred Holmes
Etech Environmental & Safety Solutions, Inc.
P.O. Box 62228
Midland, Texas 79711
Phone: 432-563-2200
Fax: 432-563-2213
E-mail: fred@etechenv.com

CONFIDENTIAL

This e-mail message, including any attachments, is intended solely for the individual(s) named above. It contains confidential and/or proprietary information. If you are not the intended recipient, please do not read, copy or distribute it or any information it contains. Please immediately notify the sender by return mail and delete it.

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, January 19, 2018 8:11 AM
To: Fred Holmes
Cc: 'Brannon Norton'; 'Rory Gray'; 'Kevin Roberts'; 'Wade Ingle'; shane@etechenv.com; 'Ted Lilly'; 'Tom Cunningham'; 'Mike Gray'; jroberts@stakeholderderms.com; ccraycraft@setecmidstream.com; 'Wally McNeil'; 'Kati Howard'
Subject: RE: Stakeholder Midstream Line Leak Update Analysis

Mr. Holmes:

Thank you for the summary for 1RP-4931. Please provide a scaled map or digital image to indicate which areas will be sampled and which will not.

Olivia

From: Fred Holmes [<mailto:fred@etechenv.com>]
Sent: Thursday, January 18, 2018 3:51 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Brannon Norton' <Brannon.Norton@flatrockenergy.net>; 'Rory Gray' <rgray@stakeholderderms.com>; 'Kevin Roberts' <kevin.roberts@flatrockenergy.net>; 'Wade Ingle' <wade.ingle@flatrockenergy.net>; shane@etechenv.com; 'Ted Lilly' <ted.lilly@flatrockenergy.net>; 'Tom Cunningham' <tcunningham@stakeholderderms.com>; 'Mike Gray' <mgray@stakeholderderms.com>; jroberts@stakeholderderms.com; ccraycraft@setecmidstream.com; 'Wally McNeil' <wally@etechenv.com>; 'Kati Howard' <kati@etechenv.com>
Subject: RE: Stakeholder Midstream Line Leak Update Analysis

Olivia,

We were never able to complete the tasks slated in the 1/14 email as the excavation around the repaired line and the excavation of impacted areas had filled with water and sediment on the day (1/15) we intended to complete them. We are waiting for the site to dry out sufficiently to complete those tasks which include:

1. Cleanout the excavated area around the release point back to its depth of 8 feet and gathering bottom and sidewall samples. As the only sample collected prior to the introduction of the water was at the bottom and considered biased due to sloughing, this will be the first full clearance sampling.
2. Cleanout of the center of the east area where the hydrocarbon had pooled and were partially excavated, then sample. As well as the corresponding sidewall on the south side of this area.
3. Cleanout of the north side of the west end that needed additional excavation and sample.

Once these are completed, and analyses is completed (TPH & BTEX), I will submit a report on all activities and any further corrective actions that may be needed. All other areas had passed prior to the introduction of the water at levels below 200 mg/kg for TPH. Also, there was evidence of free phase hydrocarbons or any signs of sheen on the water when we were at the site on the 1/15. Based upon the above, I would like to suggest that with your concurrence, the other areas would not require resampling.

Thank you for all of your assistance on this project.

Sincerely,

Fred Holmes
Etech Environmental & Safety Solutions, Inc.
P.O. Box 62228
Midland, Texas 79711
Phone: 432-563-2200
Fax: 432-563-2213
E-mail: fred@etechenv.com

CONFIDENTIAL

This e-mail message, including any attachments, is intended solely for the individual(s) named above. It contains confidential and/or proprietary information. If you are not the intended recipient, please do not read, copy or distribute it or any information it contains. Please immediately notify the sender by return mail and delete it.

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Thursday, January 18, 2018 1:02 PM
To: Fred Holmes
Cc: 'Brannon Norton'; 'Rory Gray'; 'Kevin Roberts'; 'Wade Ingle'; shane@etechenv.com; 'Ted Lilly'; 'Tom Cunningham'; 'Mike Gray'; jroberts@stakeholderms.com; ccraycraft@setecmidstream.com; 'Wally McNeil'; 'Kati Howard'
Subject: RE: Stakeholder Midstream Line Leak Update Analysis

Mr. Holmes:

Please reiterate what the initial course of action was for 1RP-4931. Is this in reference to the

information provided in the email from January 14, 2018? Has the bottom and sidewall samples been taken for laboratory analyses? If so, were these samples taken pre- or post-saturation of fluids from the drilling operation? If delineation and remediation samples were taken before the excavated area was saturated, then resampling will be required.

Thanks,
Olivia

From: Fred Holmes [<mailto:fred@etechnv.com>]
Sent: Thursday, January 18, 2018 11:37 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Brannon Norton' <Brannon.Norton@flatrockenergy.net>; 'Rory Gray' <rgray@stakeholderms.com>; 'Kevin Roberts' <kevin.roberts@flatrockenergy.net>; 'Wade Ingle' <wade.ingle@flatrockenergy.net>; shane@etechnv.com; 'Ted Lilly' <ted.lilly@flatrockenergy.net>; 'Tom Cunningham' <tcunningham@stakeholderms.com>; 'Mike Gray' <mgray@stakeholderms.com>; jroberts@stakeholderms.com; ccraycraft@setecmidstream.com; 'Wally McNeil' <wally@etechnv.com>; 'Kati Howard' <kati@etechnv.com>
Subject: Stakeholder Midstream Line Leak Update Analysis

Olivia,

I have received the analytical results on the water impact from the fracking operation on the drill site that is located directly north of the stakeholder midstream site. The analysis found the total chlorides of the water to be 96.3 mg/L. The chlorides that were in the soil prior to the impact were Non-Detect to 51.7 mg/kg.

Groundwater is 72 feet for the area. Subsequently, with your concurrence, we shall move forward with the original plan of action and disregard any chloride issues from the release of water into the excavation.

Please let me know if you agree.

Respectfully,

Fred Holmes
Etech Environmental & Safety Solutions, Inc.
P.O. Box 62228
Midland, Texas 79711
Phone: 432-563-2200
Fax: 432-563-2213
E-mail: fred@etechnv.com

CONFIDENTIAL

This e-mail message, including any attachments, is intended solely for the individual(s) named above.

It contains confidential and/or proprietary information. If you are not the intended recipient, please do not read, copy or distribute it or any information it contains. Please immediately notify the sender by return mail and delete it.

From: Yu, Olivia, EMNRD
To: "Fred Holmes"
Cc: "Jimmy McNeil"; ccraycraft@setecmidstream.com; "Brannon Norton"
Subject: RE: Stakeholder Midstream 1RP4931 Update 011518
Date: Tuesday, January 16, 2018 9:19:00 AM

Good morning Mr. Holmes:

Thank you for the update. Below is the summary of information conveyed this morning RE: 1RP-4931. Please inform of there is missing or miscommunicated information.

1. The current depth of excavation is approx. 8 ft. bgs.
2. On Monday, January 15, 2018, Etech discovered that the excavated area was filled with approx. 3 ft. of supposedly freshwater and sediment from a drilling operation in the area.
3. Etech will provide NMOCD with a) laboratory data of the freshwater to assess chloride levels along with laboratory analyses of soil samples, and b) distance of drilling operation from 1RP-4931 impacted area to determine whether the impacted area has been extended.
4. Approx. 2 bbls of fluids were recovered from the excavated area. Additional samples will be taken for assessment of chlorides.

Olivia

From: Fred Holmes [mailto:fred@etechenv.com]
Sent: Sunday, January 14, 2018 7:35 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: 'Jimmy McNeil' <wally@etechenv.com>; ccraycraft@setecmidstream.com; 'Brannon Norton' <Brannon.Norton@flatrockenergy.net>
Subject: Stakeholder Midstream 1RP4931 Update 011518

Olivia:

I saw your email from on Friday to Brannon regarding the above RP. I tried to contact you on the 12th at 1021 Hours (MST) to update you on the status of the release per our conversation on 01/10/2018. Please find this email as a as an update to the above referenced release:

1. The release occurred when a company installing utility poles drilled into a 6" buried crude oil transmission line. The company responsible for the pipeline was notified and it was immediately shut down.
2. Crews were dispatched to the site to remove free liquids still present in the line and prepare it for repairs. Etech had also dispatched an environmental scientist to the site to assess the situation.
3. Upon arrival at the location, it was reported to me that the release had followed the boring vertically upward and flowed southward for approximately 5 feet where it pooled.
4. The impacted area measured approximately 60 feet long with an average width of 15 feet. Probing the impacted area found the visual vertical extent of the impacted area to be an average of 6 inches.
5. The top of pipeline was 5' 4" below ground surface (bgs). In order to effect repairs the area had to be excavated to 8 feet bgs. This would allow the splicing unit to be installed underneath the line to effect repairs. Location of utility poles and setting up equipment necessitated equipment to need to be positioned over the impacted area.
6. Given all of the above, I instructed on-site personnel to excavate the pooled area to 1 foot and stack the impacted soil on plastic. I also instructed samples to be collected within the bottom of the excavation and from the sidewalls. They were sent for laboratory analyses for TPH, BTEX, and Chlorides. This resulted in 8 samples being collected from the excavated areas.
7. After effecting repairs, the pipeline company performed some additional cleanout of the 8 foot deep section of excavation. This was to ensure that any soils that had sloughed from the surface interval were removed from the bottom. Also, please note that the majority of this part of the excavation is in stable rock.

Currently, my environmental scientist will be on location Monday to collect samples of the bottom of the 8 foot section of the excavation as well as 6 samples from the sidewalls. Also, we are sampling three areas in the center section and 2 sidewalls the shallow excavation that had TPH levels above regulatory threshold levels. All chlorides were either non-detect or less than 70 mg/kg.

While I know it is normal protocol to submit an assessment and delineation report along with the corrective action plan, it was just not practicable to achieve this on this particular release. Once I have all of the analyses in from tomorrows sampling, I will prepare a full report on all activities.

Thank you for all of your assistance on this issue. Should you have any questions, or need to speak with me, please contact me at 432-631-3757.

Sincerely,

Fred Holmes
Etech Environmental & Safety Solutions, Inc.
P.O. Box 62228
Midland, Texas 79711
Phone: 432-563-2200
Fax: 432-563-2213
E-mail: fred@etechenv.com

CONFIDENTIAL

This e-mail message, including any attachments, is intended solely for the individual(s) named above. It contains confidential and/or proprietary information. If you are not the intended recipient, please do not read, copy or distribute it or any information it contains. Please immediately notify the sender by return mail and delete it.

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Friday, January 12, 2018 5:02 PM
To: Brannon Norton
Cc: Jimmy McNeil; fred@etechenv.com; Rory Gray
Subject: RE: C-141

Dear Mr. Norton:

The 1RP for this incident is

4931	1/12/2018	A	Stakeholder Midstream	Crude Pipeline		14S-38E-100	1/5/2018
-------------	-----------	---	-----------------------	----------------	--	-------------	----------

Please remember to include this 1RP identifier to all communications. Also, please be advised that a release characterization/delineation work plan as detailed in the attachment must be approved by NMOCD BEFORE any remediation work.

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: Brannon Norton [<mailto:Brannon.Norton@flatrockenergy.net>]
Sent: Friday, January 12, 2018 8:30 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Jimmy McNeil <wally@etechenv.com>; fred@etechenv.com; Rory Gray <rgray@stakeholderms.com>

Subject: C-141

Olivia,

Attached is the C-141 for the Stakeholder Midstream pipeline release. Let me know if you have any questions.

Thank you,

Brannon Norton
Environmental Scientist
Flatrock Engineering and Environmental
brannon.norton@flatrockenergy.net
Cell:210-452-8210