

From: Yu, Olivia, EMNRD
To: "Christine.Mathews@ghd.com"; Hernandez, Christina, EMNRD; Ericson, Dean; Jimenez, Yolanda
Cc: Boultinghouse, Stacy; cctofiling@croworld.com; Billings, Bradford, EMNRD
Subject: RE: 1RP-5177 Initial Assessment Report and Continued Assessment and Characterization Work Scope - ETC Texas Pipeline O-6 Release ~RPT-11157443-2018~
Date: Friday, October 19, 2018 4:06:00 PM
Attachments: image001.png
image002.png
image003.png
image004.png
approved_1RP5177_Final 11157443Yu-1 O-6 4" Pipeline Release Assessment.pdf

Ms. Mathews:

Release occurred on Federal minerals. BLM can verify. If so, please remember to include BLM in all communications and report submittals. It is the responsibility of the correspondent/Responsible Operator, not NMOCD, to track this information.

NMOCD approves of the proposed additional delineation for 1RP-5177. Please be advised that more than 1 groundwater monitoring well may be necessary to characterize the release. Contact NMOCD Hydrologist for further clarification/potential concerns about groundwater and SVE wells.

Also, please note that the figures provided do not have complete site characterization requirements per 19.15.29.11 NMAC.

RE: below question about site characterization. For 1RP-5177, while an initial site/release characterization report is not needed to be submitted to NMOCD; as the proposed wells will be used to complete delineation and for subsequent proposed remedial activity, NMOCD recommends that the Responsible Operator submit the appropriate information in order for the timelines to be met.

Thanks,
Olivia

From: Christine.Mathews@ghd.com <Christine.Mathews@ghd.com>
Sent: Thursday, September 13, 2018 4:05 PM
To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Ericson, Dean <Dean.Ericson@energyTransfer.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>; cctofiling@croworld.com
Subject: 1RP-5177 Initial Assessment Report and Continued Assessment and Characterization Work Scope - ETC Texas Pipeline O-6 Release ~RPT-11157443-2018~

Olivia and Christina,

Please see attached the Initial Assessment and Continued Assessment/Characterization Work Scope for 1RP-5177. Most of this was developed prior to me attending a Rule 29 review meeting in the San Juan Basin at the end of last week. After attending the meeting, It is my understanding that essentially no approvals are necessary until it comes to a Remediation Plan? Initial assessment and characterization are to be completed as necessary to fully delineate the release and address groundwater concerns. Please correct me if I am wrong.

Assessment information we have up to this point is presented here. Once characterization is complete we will establish a formal Remediation Plan with you all. In the meantime, please let us know if there are any concerns with any of what is proposed here. Otherwise we will continue to move forward as stated. We currently have drilling tentatively scheduled for the week of October 15th.

Looking forward to working with you both.

Christine Mathews
Project Manager

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Please consider our environment before printing this email

From: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Sent: Thursday, September 13, 2018 11:16 AM
To: Christine Mathews <Christine.Mathews@ghd.com>; Ericson, Dean <Dean.Ericson@energyTransfer.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>; cctofiling@croworld.com
Subject: RE: Initial C-141 - Energy Transfer - 0-6Pipeline Release ~COR-11157443~ [Copy]

Ms. Mathews,

NMOCD appreciates the resubmission of the revised C-141 form for 1RP-5177. Please note the site name has been updated and the day of discovery is the date signed by Mr. Ericson on the first C-141 submission (sent 8/27/2018) . Please see the attachment for your records.

The 1RP for this incident is

5177	8/27/2018	A	Energy Transfer	0-6 Pipeline		20S-37E-27E	8/21/2018
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Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Thanks,
Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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: Christine.Mathews@ghd.com <Christine.Mathews@ghd.com>
Sent: Thursday, August 30, 2018 3:35 PM
To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Ericson, Dean <Dean.Ericson@energyTransfer.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>; cctofiling@croworld.com
Subject: RE: Initial C-141 - Energy Transfer - 0-6Pipeline Release ~COR-11157443~

Christina,

On behalf of ETC Texas Pipeline, Ltd., attached is the revised C-141 form. Please note that the name has been changed to 0-6 Pipeline Release and the entity name is now ETC Texas Pipeline, Ltd. due to a recent merger.

Thank you,
Christine Mathews
Project Manager

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From: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>
Sent: Tuesday, August 28, 2018 8:04 AM
To: Ericson, Dean <Dean.Ericson@energyTransfer.com>; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Christine Mathews <Christine.Mathews@ghd.com>
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: RE: Initial C-141 - Energy Transfer - O-6-1 Pipeline Release #2

Dear Mr. Ericson:

NMOCD would like to request that you resubmit the C-141 using the revised C-141 form as this will facilitate future evaluations under the revised rule, NMAC 19.15.29. Your understanding is much appreciated.

Link to the Revised NMAC 19.15.29: <http://164.64.110.134/parts/title19/19.015.0029.html>

Link to the revised C-141 form: <http://www.emnrd.state.nm.us/OCD/forms.html>

Thanks,
Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Sent: Tuesday, August 28, 2018 7:52 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Christine.Mathews@ghd.com
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: RE: Initial C-141 - Energy Transfer - O-6-1 Pipeline Release #2

The O-6-1 4" pipeline release from March 2017 (1RP-4643) feeds into O-6-1 #2. Proper name for O-6-1 #2 is O-6. Will revise the C-141 to reflect the change and resubmit.

Thanks,



Dean D. Ericson

Sr. Environmental Specialist
Waste, Water & Remediation
Energy Transfer Corporation

O: 817.302.9758
C: 432.238.2142

From: Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]
Sent: Monday, August 27, 2018 4:03 PM
To: Ericson, Dean <Dean.Ericson@energyTransfer.com>; Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Christine.Mathews@ghd.com
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: RE: Initial C-141 - Energy Transfer - 0-6-1 Pipeline Release #2

Mr. Ericson:

How is this release related to the O-6-1 4" pipeline release from March 2017 (1RP-4643)? Same pipeline system? The 2 locations are in the proximity to each other, but do not seem to be connected surficially.

Thanks,
Olivia

From: Ericson, Dean <Dean.Ericson@energyTransfer.com>
Sent: Monday, August 27, 2018 1:48 PM
To: Hernandez, Christina, EMNRD <Christina.Hernandez@state.nm.us>; Christine.Mathews@ghd.com; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: RE: Initial C-141 - Energy Transfer - 0-6-1 Pipeline Release #2

Christine,

As discussed, the site in question was an "open repair bell hole". Field delineation was completed on 03/27/18. Sample results received on 03/29/18. Soil Boring completed on 07/31/18 and confirmation sample results received on 08/01/18. ETC is progressing a work plan for a well installation to test the groundwater.

Thanks,



Dean D. Ericson

Sr. Environmental Specialist
Waste, Water & Remediation
Energy Transfer Corporation

O: 817.302.9758

C: 432.238.2142

From: Hernandez, Christina, EMNRD [<mailto:Christina.Hernandez@state.nm.us>]
Sent: Monday, August 27, 2018 2:07 PM
To: Christine.Mathews@ghd.com; Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: RE: Initial C-141 - Energy Transfer - 0-6-1 Pipeline Release #2

Dear Ms. Mathews:

Please verify the date of discovery. Per regulation NMAC 19.15.29.10A, the responsible party must verbally, or by email, notify the NMOCD environmental chief and the appropriate NMOCD office all major releases within 24 hours of discovery of release (major releases only) and/or notify in writing to the appropriate NMOCD office within 15 days from the day of discovery of release (major

and minor releases).

The 1RP for this incident is

5177	8/27/2018	A	Energy Transfer	0-6-1 Pipeline		20S-37E-27E	
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Please remember to include this 1RP identifier to all communications. Revised NMAC 19.15.29 was effective on August 14, 2018.

[BLOCKED164\[.J64\[.J110\[.J134/parts/title19/19\[.J015\[.J0029\[.JhtmlBLOCKED](#)

Delineate and remediate per regulation. Additionally, please be advised to use the revised C-141 form available at: http://secure-web.cisco.com/1zXQF2D1nZBndqAkH2oouR9qlFQ4kE9grvegD0K2qynJGptHLOSL0-PetC_gA6yXgNAWxrjXkvFnZ6Uc3c_Q_WwJgh4ys-awagi20IHUSgDnvR2pGEfH8iJTeTqzGzI1cAF4eroURc6hTDjt2qiy0BBg7Do-YNRsET29pFqjnRiNTg35kPZgg0CyyKCsBB5OpO3-TZKxbSZw2qJW9JhcwQhfuJO0exrxpKP0-GnMEzOpUNN_Opt2j9l8aER4_uAipcXKNR_hVmgYFp-OK8xKRdfJFIj97sa6NJ041n4_QGycQalh5Y2pCKILvdT0KrlOZUSu-4sCMysculUjyidS-g/http%3A%2F%2Fwww.emnrd.state.nm.us%2FOCD%2Fforms.html

Please be advised that NMOCD recommends a completed site characterization/delineation report be reviewed or approved by NMOCD BEFORE any significant remediation work towards closure.

Please include Christina Hernandez (District 1 Environmental Specialist) in all future communications and report submittals.

Thanks,

Christina Hernandez
EMNRD-OCD
Environmental Specialist
1625 N. French Drive
Hobbs, NM 88240
575-393-6161 x111
Christina.Hernandez@state.nm.us

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From: Christine.Mathews@ghd.com <Christine.Mathews@ghd.com>
Sent: Monday, August 27, 2018 9:50 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>; Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>
Subject: Initial C-141 - Energy Transfer - 0-6-1 Pipeline Release #2

Olivia,

Please find attached the initial C-141 for Energy Transfer 0-6-1 Pipeline Release #2.

Any questions or concerns, please let me know.

Thank you,
Christine Mathews
Project Manager

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