



Stantec Consulting Services Inc.
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APPROVED

VIA ELECTRONIC SUBMITTAL

August 23, 2021

Cory Smith, District III
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1000 Rio Brazos Road
Aztec, NM 87410

RE: Work Plan for Soil Vapor Extraction Testing Activities
State Gas Com N #1
New Mexico Oil Conservation Division Incident Number nAUTOAB000668

Mr. Smith:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services Inc. (Stantec) is submitting this for soil vapor extraction (SVE) testing activities at the above-referenced site (Site). SVE feasibility testing is to be completed from monitoring wells MW-2, MW-5, MW-6 and MW-16. The monitoring wells each have sufficient well screen above the water table to facilitate SVE testing, and historically contained light nonaqueous-phase liquids (LNAPL) that indicate SVE could be employed to remediate hydrocarbons. Multiple monitoring wells are being testing to evaluate variability in induced vacuum and air flow potentially due to variable soil types at or above groundwater, logged during advancement of the monitoring wells. These activities build on the SVE testing completed on other wells (MW-3, MW-4, MW-10 and MW-11) in 2018. A site plan is attached for reference.

Stantec will retain the services of AcuVac Remediation (Acuvac) to mobilize and provide equipment and personnel to complete SVE testing activities. Acuvac's SVE unit includes an internal combustion engine (ICE) which reduces emissions over 99%, and therefore the New Mexico Environmental Department has confirmed short term soil vapor extraction activities do not trigger air emission concerns. Acuvac's SVE unit consists of a Roots 22 Blower capable of a vacuum of 15 inches of mercury at 60 cubic feet per minute. Testing manifolds equipped with vacuum gauges and flow measuring and sampling ports will be utilized, and Acuvac will provide the metering equipment (i.e., organic vapor analyzer, flow meters, magnehelic gauges, etc.) needed to complete the testing. Stantec will also have field staff present to oversee site activities, complete health and safety monitoring, and assist with data collection.

The SVE test on each monitoring well will be conducted for approximately 1.5 hours, with vacuum pressure incrementally increased during the test. Extraction well flow rates, vacuum pressures and off-gas hydrocarbon concentration data will be collected to evaluate potential emissions. Influent vapor samples will be collected using Summa

Review of Work Plan for Soil Vapor Extraction (SVE)
Testing Activities:

Content satisfactory

1. Continue as stated within the submitted SVE work plan. SVE feasibility testing is to be completed from monitoring wells MW-2, MW-5, MW-6 and MW-16.

Data, results, and conclusions of the SVE feasibility event to be summarized as an attachment and included with the annual groundwater monitoring report. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31, 2022.



August 23, 2021
Mr. Cory Smith
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Reference: Work Plan for SVE Testing Activities

canisters from each extraction well prior to completion of feasibility testing to aid in evaluating potential emissions for a full-scale soil vapor extraction system. In conjunction with the influent vapor samples, additional Summa samples will be collected at the SVE unit during the testing completed at monitoring well MW-2, after the ICE, to document its treatment efficiency. The Summa samples will be submitted to Eurofins-TestAmerica for analysis of benzene, toluene, ethylbenzene, xylenes (BTEX) constituents using Method TO-3, and Total Petroleum Hydrocarbons using Method TO-15. Vacuum influence data will also be collected from nearby monitoring points and monitoring wells to evaluate influence from each extraction well. No liquid waste requiring management is expected to be generated during completion of the SVE feasibility testing activities.

The data, results, and conclusions of the SVE testing will be summarized as an attachment to be included with the annual groundwater monitoring report for the Site. The attachment will include a narrative of the activities completed, a tabulated summary of the data collected, estimated hydrocarbon recovery rates and totals, laboratory analytical reports, waste disposal documentation, and other pertinent information.

The field activities are to occur on August 30, 2021. Please feel free to contact Joseph Wiley, Project Manager for EPCGP, at (713) 420-3475, or me if you have any questions or require additional information.

Sincerely,

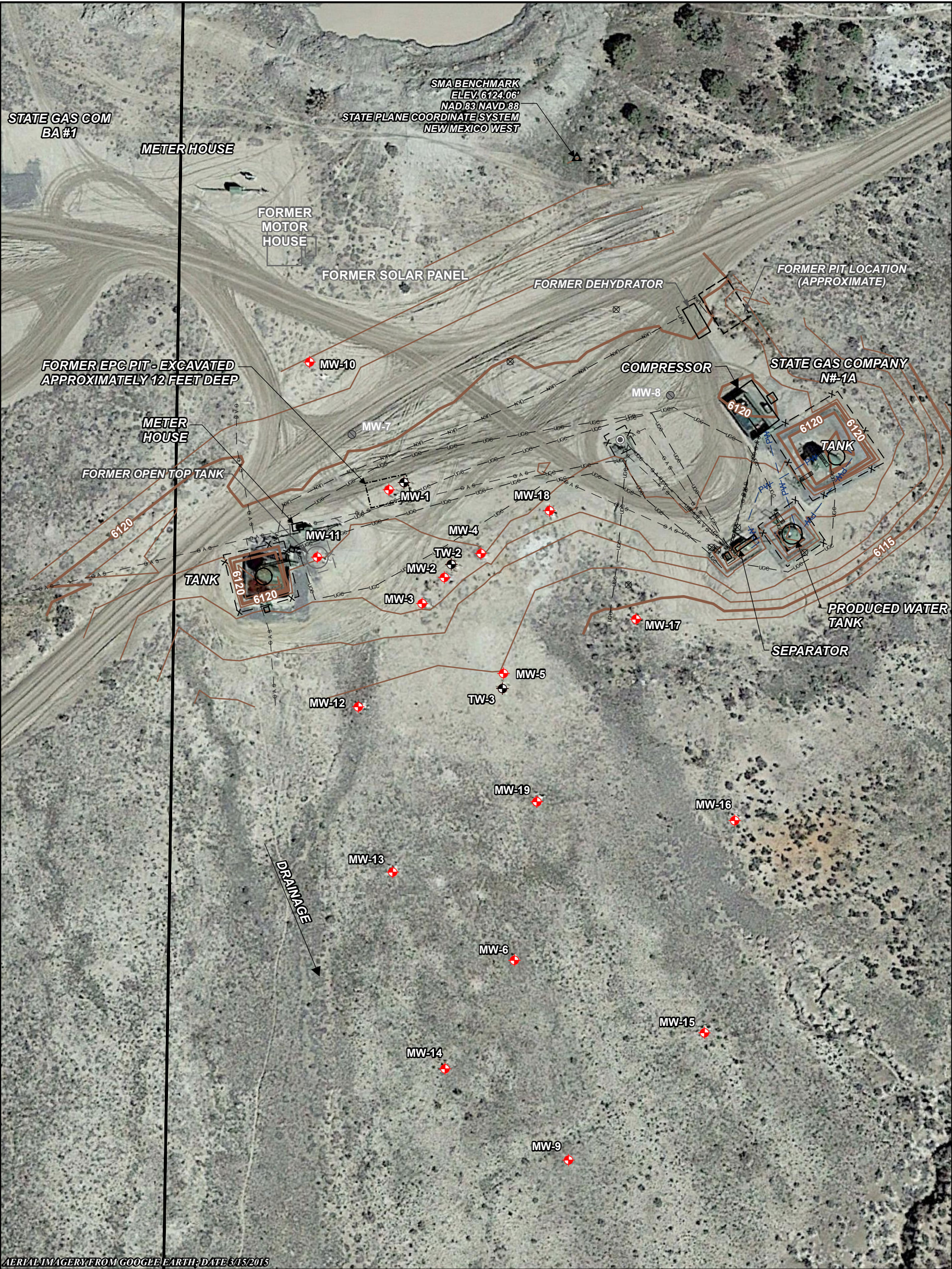
Stantec Consulting Services Inc.

A handwritten signature in blue ink, appearing to read 'Stephen Varsa'.

Stephen Varsa, P.G.
Senior Hydrogeologist
Phone: (515) 251-1020
steve.varsa@stantec.com

cc: Joseph Wiley, EPCGP

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LEGEND:

- 6120

APPROXIMATE GROUND SURFACE
CONTOUR AND ELEVATION, FEET
- x

FENCE
- GA-S

NATURAL GAS LINE
- PW

PRODUCED WATER LINE
- UNK

UNKNOWN LINE
- UG

UNDERGROUND CABLE
- STATE LAND OFFICE WATER
EASEMENT BOUNDARY
- ABANDONED MONITORING WELL
- MONITORING WELL
- RIG ANCHOR
- SMA BENCHMARK
- WELLHEAD
- TEST WELL

SCALE IN FEET

050100

REVISION

DATE

DESIGN BY

DRAWN BY

REVIEWED BY

2/11/2021

SLG

SLG

SV

TITLE:

SITE PLAN

PROJECT:

STATE GAS COM N#1
SAN JUAN RIVER BASIN
SAN JUAN COUNTY, NEW MEXICO

Stantec

Figure No.:
1

District I

1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 43943

CONDITIONS

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID:
	7046
	Action Number:
	43943
Action Type:	
[UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)	

CONDITIONS

Created By	Condition	Condition Date
nvelez	Review of Work Plan for Soil Vapor Extraction (SVE) Testing Activities: Content satisfactory 1. Continue as stated within the submitted SVE work plan. SVE feasibility testing is to be completed from monitoring wells MW-2, MW-5, MW-6 and MW-16. 2. Data, results, and conclusions of the SVE feasibility event to be summarized as an attachment and included with the annual groundwater monitoring report. Submit summarized activities completed and their results in a 2021 Annual Report. Submittal to OCD expected no later than March 31,2022.	2/10/2022