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**VIA ELECTRONIC SUBMITTAL**

August 13, 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 Feasibility Testing Activities  
Blanco Gas Plant – North Flare Pit  
New Mexico Oil Conservation Division Incident Number NAUTOFCS000155

Mr. Smith:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services Inc. (Stantec) is submitting this Work Plan for soil vapor extraction (SVE) feasibility testing activities at the above-referenced site (Site). SVE feasibility testing is to be completed from monitoring wells MW-23, MW-32, MW-44, MW-45, MW-47, MW-48, MW-51 and MW-52 (see attached figure). The monitoring wells each have sufficient well screen above the water table to facilitate SVE testing, and are located in areas where SVE may 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.

Stantec will retain the services of Acuvac Remediation, LLC to complete SVE feasibility 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 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 wells MW-32 and MW-45, after the ICE, to document its treatment efficiency. The Summa samples will be submitted to Eurofins 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.



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Mr. Cory Smith  
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**Reference: Work Plan for Soil Vapor Extraction Feasibility Testing Activities**

The data, results, and conclusions of the SVE feasibility testing will be summarized as an attachment included with the 2021 annual report for the Site. The attachment will include a narrative of the activities completed, a tabulated summary of the data collected, laboratory analytical reports, and other pertinent information.

SVE feasibility testing activities are planned for the week of August 23, 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 "Steve Varsa".

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

Attachment: Site Plan Map

cc: Joseph Wiley, EPCGP  
Laverna Jaquez, BLM (Grant NMNM 135011)

\\Us0389-pfss01\shared\_projects\193710238\07\_historical\SJRB\_GENERAL\GIS-NEW\_MXD\BLANCO NORTH FLARE PIT\2021\Figure\_1\_BNFP\_Site\_MAP\_2021.mxd

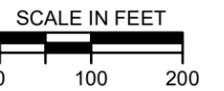
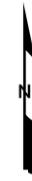


### LEGEND

- ◆ MONITORING WELL
- Ⓐ SPARGE TEST WELL
- ⊕ MONITORING POINT
- FENCE
- GATE
- ⋯ FORMER SITE FEATURES
- ⬡ FORMER FLARE PIT
- ⬡ BLM ACCESS GRANT RIGHT OF WAY

### NOTE

LABELS HIGHLIGHTED YELLOW ARE SVE FEASIBILITY WELLS



REVISION	DATE	DESIGN BY	DRAWN BY	REVIEWED BY
	8/10/2021	SAH	SAH	SRV

TITLE: **SITE PLAN MAP**

PROJECT: **BLANCO PLANT - NORTH FLARE PIT  
BLOOMFIELD, NEW MEXICO**



Figure No.: **1**

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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

CONDITIONS  
 Action 41914

**CONDITIONS**

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID: 7046
	Action Number: 41914
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

**CONDITIONS**

Created By	Condition	Condition Date
nvelez	Accepted for the record. See app ID 94607 for most updated status.	10/26/2022