

**2R - \_\_\_\_\_422\_\_\_\_\_**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):  
2010 - Present**

## Chavez, Carl J, EMNRD

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**From:** Bratcher, Mike, EMNRD  
**Sent:** Tuesday, January 13, 2015 10:19 AM  
**To:** Chavez, Carl J, EMNRD; Griswold, Jim, EMNRD  
**Cc:** Herrmann, Keith, EMNRD  
**Subject:** RE: Enterprise - South Carlsbad Faculty / Suspected GW Impact (2R-422)  
**Attachments:** Enterprise Cbad Comp Sta 003.tif

Carl,

Here is the cover letter and C-141. They sent it via USPS, so if you need in a different format or hard copy, let me know.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, January 13, 2015 7:22 AM  
**To:** Bratcher, Mike, EMNRD; Griswold, Jim, EMNRD  
**Cc:** Herrmann, Keith, EMNRD  
**Subject:** RE: Enterprise - South Carlsbad Faculty / Suspected GW Impact (2R-422)

Mike:

No, OCD Santa Fe did not receive the C-141 or copy, but was contacted by David Smith who indicated based on recent well installations that groundwater was likely impacted. Per OCD Santa Fe instructions, the operator has until 3/6/2015 to submit a report with any proposal for corrective action(s). You may send the C-141 Form to OCD Santa Fe to update the Admin. Record.

Thank you.

\*\*\*\*\*

**Chavez, Carl J, EMNRD**  
**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, January 07, 2015 2:35 PM  
**To:** David Smith, P.G. ([DRSMith@eprod.com](mailto:DRSMith@eprod.com))  
**Cc:** Herrmann, Keith, EMNRD

**Subject:** S. Carlsbad CS (2R-422)

**Attachments:** Correspondence 1-7-2015.pdf

David:

Good afternoon. Based on the attached correspondence, Condition No. 6, a report is required within 60-days of completion of recent work. If we agree the work was completed by 1/6/2015, OCD expects the report on or before 3/6/2015. I will mark my calendar.

I think Enterprise should has a feasibility section with options for remediation in order to facilitate a path forward based on the recent well work and environmental information.

Please contact me if you have questions. Thank you.

**Carl J. Chavez, CHMM**

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

O: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

Web: <http://www.emnrd.state.nm.us/ocd/>

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<http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>



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**From:** Bratcher, Mike, EMNRD

**Sent:** Monday, January 12, 2015 1:20 PM

**To:** Griswold, Jim, EMNRD; Chavez, Carl J, EMNRD

**Subject:** FW: Enterprise - South Carlsbad Facility / Suspected GW Impact

Gentlemen,

On 1/6/15 I received a C-141 reporting NAPL had accumulated in one of the monitor wells at this site. Just checking to see if you guys got a copy of it.

Mike Bratcher

NMOCD District 2

811 S. First Street

Artesia, NM 88210

O: 575-748-1283 X108

C: 575-626-0857

F: 575-748-9720

---

**From:** Smith, David [<mailto:DRSmith@eprod.com>]

**Sent:** Friday, December 19, 2014 12:13 PM

**To:** Bratcher, Mike, EMNRD

**Cc:** Griswold, Jim, EMNRD; Chavez, Carl J, EMNRD; Thompson, Roger; Babinski, Dina; DeLeon, Osman; Miller, Greg  
**Subject:** Enterprise - South Carlsbad Facility / Suspected GW Impact

Mike, I am currently working on an existing remedial action project at our South Carlsbad facility. This week, site groundwater investigations are being conducted in accordance with an October 3, 2014 *Supplemental Corrective Action Report & Corrective Action Work Plan*, as approved by the NMOCD on November 21, 2014. Carl Chavez is the Santa Fe OCD project manager for the project. Initial input I received from my consultant today indicates that groundwater impacts are likely, based on their field observations. This will be confirmed when groundwater samples are analyzed.

I left a voicemail on the OCD District 2 general response number since your voicemail box is currently full. Let me know if any additional information is needed at this time, an update will be provided within 15 days.

David R. Smith, P.G.

Senior Environmental Scientist  
Enterprise Products Operating LLC  
1100 Louisiana, Rm 20.129  
Houston, TX 77002-5227  
Office: (713) 381-2286  
Mobile: (713) 501-8136  
Email: [drsmith@eprod.com](mailto:drsmith@eprod.com)

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ENTERPRISE PRODUCTS PARTNERS L.P.  
ENTERPRISE PRODUCTS HOLDINGS LLC  
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

December 30, 2014

7014 2120 0001 5336 2771  
Return Receipt Requested

Mr. Mike Bratcher  
New Mexico Energy, Minerals & Natural Resources  
Department - Oil Conservation Division District 2 Office  
811 South First Street  
Artesia, New Mexico 88210

**NM OIL CONSERVATION**

ARTESIA DISTRICT

JAN 06 2015

RECEIVED

**RE: Initial C-141 Notification**  
**Enterprise S. Carlsbad Compressor Station (OCD Permit No. 2R-422)**  
**SE ¼ of SE ¼ in S12, T23S, R27E**  
**Carlsbad, Eddy County, New Mexico**

Dear Mr. Bratcher:

In accordance with the notification requirements of 19.15.29 NMAC, Enterprise Field Services, LLC (Enterprise) is submitting the attached initial C-141 Form for suspected groundwater impacts at our South Carlsbad Compressor Station. On December 19, 2014, Enterprise received information from our consultant that a newly installed monitor well at the facility had accumulated non-aqueous phase liquid. Enterprise provided immediate verbal and email notification to the New Mexico Oil Conservation Division, and this C-141 Form is being submitted within 15-days of the original notification.

Should you have any questions, comments or concerns, or need additional information, please feel free to contact me at 713-381-2286.

Sincerely,

David R. Smith, P.G.  
Sr. Environmental Scientist

/sjn  
ec:

Carl Chavez, OCD, Santa Fe, NM  
Mike Bratcher, OCD District 2, Artesia, NM  
Heather Patterson, OCD District 2, Artesia, NM  
Liz Scaggs, APEX, Dallas, TX  
Joseph Martinez, APEX, San Antonio, TX

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

ARTESIA DISTRICT

Form C-141  
Revised August 8, 2011

JAN 06 2015

Submit Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company	Enterprise Field Services, LLC	Contact	David R. Smith
Address	P.O. Box 4324, Houston, TX 77210-4324	Telephone No.	(713) 381-2286
Facility Name	South Carlsbad Compressor Station	Facility Type	Compressor Station
Surface Owner	Enterprise Products	Mineral Owner	NA
		API No.	NA

**LOCATION OF RELEASE**

Unit Letter	Section 18	Township 23S	Range 27E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude 32.313710 Longitude -104.136661

**NATURE OF RELEASE**

Type of Release	Condensate	Volume of Release	unknown	Volume Recovered	NA
Source of Release	Former condensate tanks	Date and Hour of Occurrence	NA / Historical	Date and Hour of Discovery	12/19/14 / 10:00 a.m. (suspected groundwater impact based on field observations)
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Mike Bratcher, NMOCD District 2		
By Whom?	David R. Smith	Date and Hour	12/19/14 / 1:00 p.m.		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

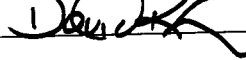
If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
During decommissioning of a condensate tank battery at the South Carlsbad Compressor Station, underlying soils identified within the earthen tank containment system appeared to be affected by the historical operations. Following removal of the tanks, initial soil boring investigations (performed during November 2009), established the presence of affected soils exceeding NMOCD standards. NMOCD Permit 2R-422 was assigned to the facility, and, approximately 600 cubic yards of affected soils were treated on site in accordance with NMOCD (Santa Fe Office) approvals.

Describe Area Affected and Cleanup Action Taken.\*  
Additional site investigations have been performed at the facility to delineate the extent of affected soil, since not all affected soil could effectively be removed due to the proximity of facility equipment. On October 24, 2014, the NMOCD approved a proposed site investigation work plan for installation of monitor wells to determine if groundwater at the facility has been affected by historical operations. Installation of these monitor wells began on December 16, 2014, and on December 19, 2014, Enterprise was notified by the onsite consultant that non-aqueous phase liquid (NAPL) had accumulated in a monitor well installed at the site. Although no groundwater analytical results are available from the newly installed monitor wells, groundwater is assumed to be affected, based on the NAPL presence. Immediate notice was provided to the NMOCD on December 19, 2014, and this initial C-141 is being submitted for the suspected groundwater impact.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist:		
Printed Name: David R. Smith	Approval Date:	Expiration Date:	
Title: Sr. Environmental Scientist	Conditions of Approval:		Attached <input type="checkbox"/>
E-mail Address: DRSmith@eprod.com			
Date: 12/30/14	Phone: (713) 381-2286		

\* Attach Additional Sheets If Necessary

## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, January 07, 2015 2:35 PM  
**To:** David Smith, P.G. (DRSMith@eprod.com)  
**Cc:** Herrmann, Keith, EMNRD  
**Subject:** S. Carlsbad CS (2R-422)  
**Attachments:** Correspondence 1-7-2015.pdf

David:

Good afternoon. Based on the attached correspondence, Condition No. 6, a report is required within 60-days of completion of recent work. If we agree the work was completed by 1/6/2015, OCD expects the report on or before 3/6/2015. I will mark my calendar.

I think Enterprise should has a feasibility section with options for remediation in order to facilitate a path forward based on the recent well work and environmental information.

Please contact me if you have questions. Thank you.

### Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
O: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

Web: <http://www.emnrd.state.nm.us/oed/>

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Good afternoon. Based on the attached correspondence, Condition No. 6, a report is required within 60-days of completion of recent work. If we agree the work was completed by 1/6/2015, OCD expects the report on or before 3/6/2015. I will mark my calendar.

I think Enterprise should has a feasibility section with options for remediation in order to facilitate a path forward based on the recent well work and environmental information.

Please contact me if you have questions. Thank you.

### **Carl J. Chavez, CHMM**

New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
O: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

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## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, October 24, 2014 8:01 AM  
**To:** 'Smith, David'  
**Cc:** Griswold, Jim, EMNRD  
**Subject:** RE: S. Carlsbad Compressor Station - SCAR & CAWP

Mr. Smith:

The New Mexico Oil Conservation Division (OCD) is in receipt of the Enterprise South Carlsbad Compressor Station: Supplemental Corrective Action Report- SCAR (report) and Corrective Action Work Plan- CAWP (plan) dated July 24, 2014 on October 3, 2014.

OCD has completed its review of the report and plan. OCD hereby **approves** the plan with the following observations and conditions:

### Report:

- 1) There are 4 water wells within 1,000 ft. of the facility.
- 2) The water table is much shallower (~ 30 ft.) than previously expected.
- 3) OCD notices that the 5 borings have no designations, but are represented in a report figure by red dots.
- 4) OCD observes from its July 17, 2012 correspondence to Mr. Joseph Martinez (SWG, but now APEX) that a completed C-137EZ Form(s) for the small landfarm(s) was requested to be submitted and that landfarmed soils must meet the closure standards for a small landfarm(s) or other means for contaminated soils disposition approved by the OCD. Therefore, OCD allowed the small landfarm(s) corrective action for petroleum contaminated soils under the 19.15.29 NMAC remediation plan process.
- 5) OCD observes that the report did not include all environmental laboratory QA/QC reports for the sample locations depicted in the figures.

### Plan:

- 1) The 5 borings shall be hereafter referred to as monitor wells (MWs 1 - 5) and should not meet with "refusal" based on the drill rig, strata, and relative shallow depth to the water table aquifer.
- 2) The operator shall collect standard hydrogeologic information from the MWs to assess ground water flow direction, The topography appears to slope E-NE toward Cass Draw.

### Conditions:

- 1) The small landfarm with the VZ-2 elevated chloride concentration appears to be anomalous based on the surrounding sampling, and ground water sampling should verify whether chloride contamination exists at depth from the release.
- 2) The operator has met the C-137EZ Form closure criteria in the small landfarm(s) with the exception of landfarm VZ-2 sample location. The operator may conduct further investigation with depth at the VZ-2 location to verify that a chloride source does not exist with depth or rely on the MW water media data collected under the plan to verify that a source of chloride contamination is not present. The operator shall propose the final disposition of stockpiled soils (~ 600 yds) from the landfarm(s) remediation to the OCD within 30 days of the date of this correspondence. OCD does not recommend stockpiling and/or

concentrating soils with residual hydrocarbons to prevent new source areas from precipitation, etc. at the facility.

- 3) OCD requires the proposed borings to be denominated as MWs 1 – 5 with “1” being closest to the EC-1 location where the operator identified contamination, but backfilled the location before OCD could approve the corrective action.
- 4) The MW water media samples shall include chloride analysis.
- 5) The operator shall collect standard hydrogeologic data and triangulate ground water flow direction from at least 3 MWs and attempt to position a downgradient MW away from the source area.
- 6) A report based on the MW installations and sampling shall be submitted to the OCD within 60 days of completion of the work. The report shall include complete environmental analytical laboratory data with QA/QC for the water media sampling conducted with “conclusions” and “recommendations” sections to assist OCD with the path forward based on the data results.

Please contact me if you have questions. Thank you.

**Carl J. Chavez, CHMM**

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

O: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

Web: <http://www.emnrd.state.nm.us/ocd/>

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---

**From:** Smith, David [mailto:[DRSmith@eprod.com](mailto:DRSmith@eprod.com)]

**Sent:** Thursday, October 23, 2014 7:25 AM

**To:** Chavez, Carl J, EMNRD

**Subject:** RE: S. Carlsbad Compressor Station - SCAR & CAWP

Carl, let me know if we can proceed with site groundwater investigations at this facility. Please give me a call if you have any questions, thanks.

**David R. Smith, P.G.**

Senior Environmental Scientist

Enterprise Products Operating LLC

1100 Louisiana, Rm 20.129

Houston, TX 77002-5227

Office: (713) 381-2286

Mobile: (713) 501-8136

Email: [drsmith@eprod.com](mailto:drsmith@eprod.com)

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**From:** Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]  
**Sent:** Friday, October 10, 2014 5:25 PM  
**To:** Parker, DeeDee; Griswold, Jim, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Smith, David  
**Subject:** RE: S. Carlsbad Compressor Station - SCAR & CAWP

Ms. Parker:

Received. Thank you.

**OCD Environmental Engineers:**

**Carl Chavez** (505) 476-3490

- Discharge Permits, National Pollutant Discharge Elimination System (NPDES); Point-of-Contact; Refineries; and Underground Injection Control Program QA/QC Officer

**Jim Griswold** (505) 476-3465

- Hydrologist and Groundwater Remediations

**Brad Jones** (505) 476-3487

- Hydrostatic Testing; Pits/Ponds; Produced Water; and Surface Waste Management Facilities

**Leonard Lowe** (505) 476-3492

- C- 133 Processing (Produced Water Authorization Applications); Discharge Permits and Facility Inspections

**Glenn von Gonten** (505) 476-3488

- Hydrologist and Groundwater Remediations

**Carl J. Chavez, CHMM**

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

O: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

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**From:** Parker, DeeDee [<mailto:DParker@eprod.com>]  
**Sent:** Friday, October 03, 2014 9:06 AM  
**To:** Griswold, Jim, EMNRD; Chavez, Carl J, EMNRD; Bratcher, Mike, EMNRD  
**Cc:** Smith, David  
**Subject:** S. Carlsbad Compressor Station - SCAR & CAWP

The attached documents were sent out to the New Mexico Energy, Minerals & Natural Resources Department. The documents were also uploaded in the NM OCD ftp. site.

Please contact David Smith at (713) 381-2286, if you have any questions.

*Thank you!*

*DeeDee Parker*

*DeeDee Parker, Analyst, Remediation  
Enterprise Products Operating LLC  
EHS&T-Remediation  
1100 Louisiana, Rm. 20.130  
Houston, Texas 77002  
office: (713) 381-6640*

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## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, October 09, 2013 4:38 PM  
**To:** 'rmsartor@eprod.com'  
**Cc:** Joseph.Martinez@southwestgeoscience.com; Bratcher, Mike, EMNRD  
**Subject:** Enterprise Products Operating LLC (EP) South Carlsbad CS (2R-422) Supplemental Corrective Action Work Plan (SCAWP) dated September 25, 2013

Mr. Sartor:

The New Mexico Oil Conservation Division (OCD) has completed its review of the above subject SCAWP (response plan) completed by Mr. Joseph W. Martinez and Mr. B. Chris Mitchell P.G. The OCD hereby **approves** the response plan.

The OCD looks forward to working with EP to close this corrective action site soon.

Thank you in advance.

*Please be advised that OCD approval of this response plan does not relieve **Enterprise Products Operating LLC** of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve **Enterprise Products Operating LLC** of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)  
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## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, October 04, 2012 2:04 PM  
**To:** 'rmsartor@eprod.com'  
**Cc:** VonGonten, Glenn, EMNRD; Bratcher, Mike, EMNRD;  
Joseph.Martinez@southwestgeoscience.com  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Mr. Sartor:

Good afternoon. The New Mexico Oil Conservation Division (OCD) is in receipt of the Enterprise Products (EP) letter (letter) dated September 28, 2012.

The letter and attached correspondence from Mr. Joseph W. Martinez with Southwest Geoscience dated September 10, 2012 were reviewed by OCD and OCD is in agreement with EP's responses to OCD's July 17, 2012 recommendations with the exception of Section B (Vadose Zone Tank Battery Excavation) No.1.

The OCD requests that EP propose its preferred corrective action option(s) to the OCD to investigate and verify that soil contamination in the vicinity of B-2 is not present at deeper depth. In addition, an option that would allow EP to remove contamination during the field investigation would be preferred.

The OCD looks forward to working with EP to close this corrective action site out soon.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)  
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---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, July 17, 2012 12:23 PM  
**To:** 'Joseph Martinez'  
**Cc:** VonGonten, Glenn, EMNRD  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has completed its review the cover letter dated May 9, 2012 and 2R-422 Corrective Action Report dated May 1, 2012.

### Enterprise Products (EP) request(s) the following:

- 1) Close the landfarms and reuse the remediated landfarm soils.

- 2) Close the cleanup based on Alternative Abatement Standards for the tank batter cleanup under the WQCC Regulations.
- 3) Cleanup capability is limited due to surface and subsurface infrastructure.
- 4) Source area has been vertically delineated.

**I. OCD Comments and/or Observations are:**

- 1) OCD notices that EP is requesting closure of the small landfarms based on the alternate abatement standards for cleanup under WQCC regulations, even though the landfarms are regulated under oil and gas regulations, i.e., 19.15.36 NMAC.
- 2) OCD requires its OCD risk-based spill guidance soil criteria for the cleanup of the tank battery release, i.e., Benzene (10 ppm); BTEX (50 ppm); and TPH (100 ppm) based on the depth to static water level below ground.
- 3) OCD notices that "small landfarm" cleanup standards under 19.15.36 NMAC have not yet been achieved.
- 4) OCD notices elevated chloride levels in Vadose Zone 2 within a landfarm area, which warrants resampling for confirmation.
- 5) The north face of the tank battery excavation EC-1(R) is contaminated; however, EP backfilled the excavation before receiving CA approval.
- 6) OCD presumes that SB-1 (not depicted on Figure 3) is located at the leaky tank battery (natural gas condensate/product liquids) or point source. If not, OCD requires investigation similar to B.1 below.
- 7) Geoprobe investigation method resulted in refusal at relatively shallow depth and may not have been the preferred investigation technique. Air rotary is capable of achieving depth and environmental information needed to conclude the release is localized to the upper 10 ft. as theorized by EP.

**II. OCD conclusions and/or recommendations are:**

**A. Small Landfarm**

- 1) C-137EZ Forms for each (2) small landfarm with supporting soils quality information that meets the criteria must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm) and TPH < 2,500 ppm. The closure standards have not been met under OCD oil and gas regulations.
- 2) Another sample from VZ2 is required to confirm the chloride exceedance in soils.

**B. Vadose Zone Tank Battery Excavation**

- 1) An air rotary drilled soil boring to water table with water table sample collection and field VOC field monitoring is required near SB-3 and SB-1 (tank battery source area) to confirm the condition of the vadose zone and that phase separated hydrocarbons are not present in the subsurface. If contamination is present, a minimum 2 inch diameter monitor well shall be installed with 15 ft. of screen (5 ft. above the water table and 10 ft. below the water table) and monitored quarterly to assess any impact to ground water.

OCD notices that EP states that a subsurface sandstone unit impermeable and drilling terminated in SB-1 before the water table was encountered and sampled.

- 2) More delineation of the excavation toward the N, NE and E and NW may be required based on the soil boring installation above.

Please contact me to discuss. Thank you.

Carl J. Chavez, CHMM  
 New Mexico Energy, Minerals & Natural Resources Department  
 Oil Conservation Division, Environmental Bureau  
 1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
 Office: (505) 476-3490



ENTERPRISE PRODUCTS PARTNERS L.P.  
ENTERPRISE PRODUCTS HOLDINGS LLC  
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

RECEIVED OCD

September 28, 2012

2012 OCT -1 P 1:14

Return Receipt Requested  
7010 1870 0001 2945 2647

Mr. Carl Chavez  
New Mexico Energy, Minerals and Natural Resources  
Oil Conservation Division - District 4  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87595

**RE: Letter Response to Corrective Action Report Review**  
**Enterprise S. Carlsbad Compressor Station (OCD Permit No. 2R-422)**  
**SE ¼ of SE ¼ in S12, T23S, R27E**  
**Carlsbad, Eddy County, New Mexico**

Dear Mr. Chavez:

Enterprise Products Operating LLC (Enterprise) is submitting the enclosed *Letter Response to Corrective Action Report Review* dated September 10, 2012 for the Enterprise S. Carlsbad Compressor Station (referred to as the "Site" hereinafter). The Site is located at the northwest intersection of Carrasco Road and CR 710, approximately ten (10) miles southeast of Carlsbad, in Eddy County, New Mexico [SE ¼, SE ¼, Section 12, Township 23S, and Range 27E]. The Site is currently operating as natural gas compressor station operated by Enterprise.

The New Mexico Oil Conservation Division (OCD) reviewed the CAR issued for the Site and responded with comments/observations and conclusions/recommendations in a correspondence email on July 17, 2012. The purpose of this letter response is to provide information or responses to the conclusions and/or recommendations which were issued by the OCD.

#### **A. SMALL LANDFARM**

**OCD Conclusion/Recommendation No. 1 (Section A. Small Landfarm) :** *"C-137EZ Forms for each (2) small landfarm with supporting soils quality information that meets the criteria must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm) and TPH < 2,500 ppm. The closure standards have not been met under OCD oil and gas regulations."*

Based on the laboratory analytical results, the most recent soil confirmation samples collected from sampling points TS-1 through TS-20 did not exhibit benzene, total BTEX, TPH GRO/DRO, or chlorides concentrations in exceedance of the *Small Landfarm Closure Performance Standards*. A Form C-137 EZ will be completed for the landfarm treatment cells subsequent to completion of additional soil sampling activities proposed below.

**OCD Conclusion/Recommendation No. 2 (Section A. Small Landfarm) :** *"Another sample from VZ2 is required to confirm the chloride exceedance in soils."*



**Response:** Vadose zone sample VZ-2 exhibited a chlorides concentration of 1,300 mg/Kg, which exceeds the NMAC *Small Landfarm Closure Performance Standards* of 500 mg/Kg. It should be noted that the chlorides concentrations observed in confirmation soil samples collected from 20 sampling locations within the landfarm treatment cells ranged from 100 mg/Kg to 600 mg/Kg. Therefore, it is believed that the elevated chlorides concentration observed in vadose sample VZ-2 may be attributed to naturally occurring chlorides in the native soil at the Site. Enterprise proposes to collect three (3) additional soil samples from the vadose zone to further evaluate the magnitude of chlorides in vadose zone soils underlying the southwest landfarm cell. Each of the soil samples will be submitted for chlorides analysis utilizing EPA method 300.0.

## **B. VADOSE ZONE TANK BATTERY EXCAVATION**

**OCD Conclusion/Recommendation No. 1 (Section B. Vadose Zone Tank Battery Excavation) :** *"An air rotary drilled soil boring to water table with water table sample collection and field VOC field monitoring is required near SB-3 and SB-1 (tank battery source area) to confirm the condition of the vadose zone and that phase separated hydrocarbons are not present in the subsurface. If contamination is present, a minimum 2 inch diameter monitor well shall be installed with 15 ft. of screen (5 ft. above the water table and 10 ft. below the water table) and monitored quarterly to assess any impact to ground water.*

*OCD notices that EP states that a subsurface sandstone unit impermeable and drilling terminated in SB-1 before the water table was encountered and sampled."*

**Response:** On November 5, 2009, one (1) soil boring (B-1) was advanced in the vicinity of the former condensate storage tank to a depth of 20 feet below ground surface (bgs). Soil samples were screened for evidence of impairment in one-foot intervals to the boring terminus. Evidence of impairment was not identified in the bottom five feet of soil boring B-1. In addition, a soil sample collected from 19-20 feet bgs did not exhibit TPH GRO/DRO or BTEX concentrations in exceedance of the OCD *Remediation Action Levels*. The presence of the pale siltstone and underlying sandstone, which was encountered in soil boring B-1 and appears to be the initial confining layer, was confirmed during the completion of corrective actions. Excavation activities were limited to depths ranging from 12 to 15 feet bgs due to the presence of competent sandstone. In addition, based on the laboratory analytical results, confirmation soil sample EC-5 at 14 to 15 feet bgs, which was collected from the floor of the final excavation, did not exhibit TPH GRO/DRO, benzene, or total BTEX concentrations in exceedance of the OCD *Remediation Action Levels*. Based on area water well database records obtained through the New Mexico Office of the State Engineer (OSE), the depth to groundwater in the vicinity of the Site is estimated to be 78 feet bgs.

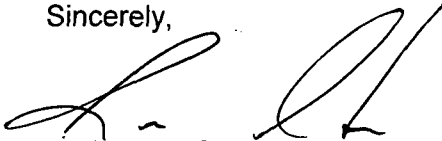
Based on the lithology observed during investigation and corrective action activities, the results of laboratory analysis confirming vertical delineation of petroleum hydrocarbon COCs and review of the New Mexico OSE records, COCs do not appear to threaten the initial groundwater bearing unit at the Site.

**OCD Conclusion/Recommendation No. 2 (Section B. Vadose Zone Tank Battery Excavation):** *"More delineation of the excavation toward the N, NE and E and NW may be required based on the soil boring installation above."*

**Response:** Due to the presence of the plant and associated processing equipment, access to further evaluate the horizontal extent of COCs to the north and northeast is limited. The nearest accessible locations would be greater than 200 feet from the existing data points.

Should the OCD conclude that no further action is required at the Site or closure of the small landfarm permit is appropriate, Enterprise respectfully requests a written response which documents the decision. Should you have any questions, comments or concerns, or need additional information, please feel free to contact me at 713-381-6629.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rodney M. Sartor', is written over a horizontal line.

Rodney M. Sartor, REM  
Manager, Remediation

/dep

cc: James Heap, Enterprise Products  
Joseph Martinez, Southwest Geoscience

# Southwest GEOSCIENCE

8829 Tradeway Street  
San Antonio, Texas 78217

Ph: (210) 804-9922

Fax: (210) 804-9944

September 10, 2012

Enterprise Products Operating LLC  
PO Box 4324  
Houston, Texas 77210  
Attention: Mr. Rodney M. Sartor

Re: **Letter Response to Correction Action Report Review**  
S. Carlsbad Compressor Station (OCD Permit No. 2R-422)  
NWC of Carrasco Road and CR 710  
Carlsbad, Eddy County, New Mexico  
N 32.313044°; W -104.136794°  
SWG Project No.: 0210003

Mr. Sartor, ,

Southwest Geoscience (SWG) issued a Corrective Action Report (CAR) for the Enterprise Products Operating LLC (Enterprise) S. Carlsbad Compressor Station on May 1, 2012. The Enterprise S. Carlsbad Compressor Station is located at the northwest corner of the Carrasoco Road and CR 710 intersection in Carlsbad, Eddy County, New Mexico (the "Site"). A topographic map depicting the location of the Site is included as Figure 1 and a site vicinity map is included as Figure 2 of Attachment A. In addition, a site map indicating the approximate location of site investigation and corrective action activities is included as Figure 3 of Attachment A.

The New Mexico Oil Conservation Division (OCD) reviewed the CAR issued for the Site and responded with comments/observations and conclusions/recommendations in a correspondence email on July 17, 2012. The purpose of this letter response is to provide information or responses to the conclusions and/or recommendations which were issued by the OCD. The conclusions and/or recommendations issued by the OCD and SWG response are as follows:

## **A. SMALL LANDFARM**

**OCD Conclusion/Recommendation No. 1 (*Section A. Small Landfarm*) :** *"C-137EZ Forms for each (2) small landfarm with supporting soils quality information that meets the criteria must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm) and TPH < 2,500 ppm. The closure standards have not been met under OCD oil and gas regulations."*

**SWG Response:** Soil confirmation samples were collected from the treated soils within the two on-Site landfarms during one or more sampling evens in March, April, August and November of 2011. The soil confirmation samples were submitted for total petroleum hydrocarbons (TPH) gasoline range organics (GRO)/diesel range organics (DRO), benzene, toluene, ethylbenzene and xylenes (BTEX), and/or chlorides analysis utilizing EPA method SW-846 #8015M, EPA method SW-846 #8021B, and EPA method 300.0, respectively. The reported petroleum hydrocarbon constituents of concern (COC) concentrations were compared to the NMAC 19.15.36 *Small Landfarm Closure Performance Standards* (i.e.:

concentrations of benzene  $\leq 0.2$  mg/Kg; total BTEX  $\leq 50$  mg/Kg; and TPH GRO/DRO  $\leq 500$  mg/Kg, (via method SW-846 #8015M); and chlorides  $\leq 500$  mg/Kg]. Based on the laboratory analytical results, the most recent soil confirmation samples collected from sampling points TS-1 through TS-20 did not exhibit benzene, total BTEX, TPH GRO/DRO, or Chlorides concentrations in exceedance of the *Small Landfarm Closure Performance Standards*. The laboratory analytical results for the soil confirmation samples collected from the landfarm are summarized in Table 2 of Attachment B. A Form C-137 EZ will be completed for the landfarm treatment cells subsequent to completion of additional soil sampling activities proposed below.

**OCD Conclusion/Recommendation No. 2 (Section A. Small Landfarm) :** *"Another sample from VZ2 is required to confirm the chloride exceedance in soils."*

**SWG Response:** A vadose zone soil sample VZ-2 was collected from the center of the landfarm treatment cell located on the southwest portion of the Site. Vadose zone soil sample VZ-2 was collected utilizing hand tools and on-site equipment from approximately 3 to 3.25 feet below ground surface (bgs). The vadose zone soil sample was submitted for TPH GRO/DRO, BTEX, and chlorides analysis. Based on the laboratory analytical results, vadose zone soil sample VZ-2 did not exhibit TPH GRO/DRO, benzene, or total BTEX concentrations in exceedance of the NMAC *Small Landfarm Closure Performance Standards*. However, vadose zone sample VZ-2 exhibited a chlorides concentration of 1,300 mg/Kg, which exceeds the NMAC *Small Landfarm Closure Performance Standards* of 500 mg/Kg. It should be noted that the chlorides concentrations observed in confirmation soil samples collected from 20 sampling locations within the landfarm treatment cells ranged from 100 mg/Kg to 600 mg/Kg. Therefore, it is believed that the elevated chlorides concentration observed in vadose sample VZ-2 may be attributed to naturally occurring chlorides in the native soil at the Site.

SWG will collect three (3) additional soil samples from the vadose zone to further evaluate the magnitude of chlorides in vadose zone soils underlying the landfarm area. Each of the soil samples will be submitted for chlorides analysis utilizing EPA method 300.0.

#### **B. VADOSE ZONE TANK BATTERY EXCAVATION**

**OCD Conclusion/Recommendation No. 1 (Section B. Vadose Zone Tank Battery Excavation) :** *"An air rotary drilled soil boring to water table with water table sample collection and field VOC field monitoring is required near SB-3 and SB-1 (tank battery source area) to confirm the condition of the vadose zone and that phase separated hydrocarbons are not present in the subsurface. If contamination is present, a minimum 2 inch diameter monitor well shall be installed with 15 ft. of screen (5 ft. above the water table and 10 ft. below the water table) and monitored quarterly to assess any impact to ground water."*

*OCD notices that EP states that a subsurface sandstone unit impermeable and drilling terminated in SB-1 before the water table was encountered and sampled."*

**SWG Response:** On November 5, 2009, SWG advanced one (1) soil boring (B-1) in the vicinity of the former condensate storage tank. Soil boring B-1 was advanced using an air rotary drilling rig under the supervision of a State of New Mexico licensed water well driller.

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Soil samples were collected continuously. Soil samples were observed to document soil lithology, color, moisture content and visual and olfactory evidence of petroleum hydrocarbons. Each soil sample was immediately divided into portions designated for field screening or laboratory analysis. Field headspace analysis was conducted by placing the portion of the soil sample designated for field screening into a plastic Ziploc bag. The plastic bag was sealed and then placed in a warm area to promote volatilization. The air above the sample, the headspace, was then evaluated using a photoionization detector (PID) capable of detecting volatile organic compounds (VOCs). The PID was calibrated utilizing an isobutylene standard prior to use in the field.

During the completion of the soil boring, an on-Site geoscientist documented the lithology encountered and constructed a continuous profile of the soil column from the surface to the soil boring terminus. Soil samples from the soil boring were visually inspected and classified in the field. The lithology encountered during the advancement of soil boring B-1 included a gray silty sand to a depth of eleven (11) feet bgs. The silty sand was underlain by a pale brown sandy siltstone to a depth of 17 feet bgs. A brown sandstone was encountered from a depth of 17 feet bgs to the terminus of the soil boring at 20 feet bgs. Groundwater was not encountered during the advancement of the soil boring. Significant PID readings (>100 ppm) were not identified below 15 feet bgs in soil boring B-1. The soil boring was terminated approximately 5 feet below field evidence of impairment. In addition, a soil samples collected from boring B-1 at a depth of 19 to 20 feet bgs did not exhibit benzene, toluene or ethylbenzene concentrations above the laboratory practical quantitation limits (PQL). The soil sample collected from soil boring B-1 from 19 to 20 feet bgs exhibited a xylenes concentration of 0.036 mg/Kg, a TPH GRO concentration of 0.15 mg/Kg and a TPH DRO concentration of 24 mg/Kg, which are below the OCD *Remediation Action Levels*.

The presence of the pale brown sandy siltstone and underlying sandstone, which appears to be the initial confining layer, was confirmed during the completion of corrective actions. Excavation activities were limited to depths ranging from 12 to 15 feet bgs due to the presence of competent sandstone. In addition, based on the laboratory analytical results, confirmation soil sample EC-5, which was collected from the floor of the final excavation, did not exhibit TPH GRO/DRO, benzene, or total BTEX concentrations in exceedance of the OCD *Remediation Action Levels*.

Based on area water well database records obtained through the New Mexico Office of the State Engineer (OSE), the depth to groundwater in the vicinity of the Site is estimated to be 78 feet bgs.

Based on the lithology observed during investigation and corrective action activities, the results of laboratory analysis confirming vertical delineation of petroleum hydrocarbon COCs and review of the New Mexico OSE records, COCs do not appear to threaten the initial groundwater bearing unit at the Site.

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Letter Response to Corrective Action Report Review  
S. Carlsbad Compressor Station  
Carlsbad, Eddy County, New Mexico  
SWG Project No. 0210003  
September 10, 2012

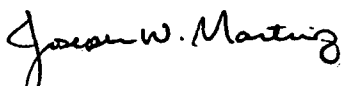
**Southwest**  
GEOSCIENCE

**OCD Conclusion/Recommendation No. 2 (Section B. Vadose Zone Tank Battery Excavation):** "More delineation of the excavation toward the N, NE and E and NW may be required based on the soil boring installation above."

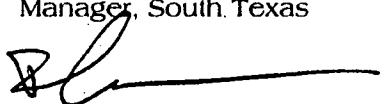
**SWG Response:** Due to the presence of the plant and associated processing equipment, access to further evaluate the horizontal extent of COCs to the north and northeast is limited. The nearest accessible locations would be greater than 200 feet from the existing data points.

SWG appreciates the opportunity to be of service on this project. If we can be of further assistance, please contact the undersigned.

Sincerely,



Joseph W. Martinez  
Manager, South Texas

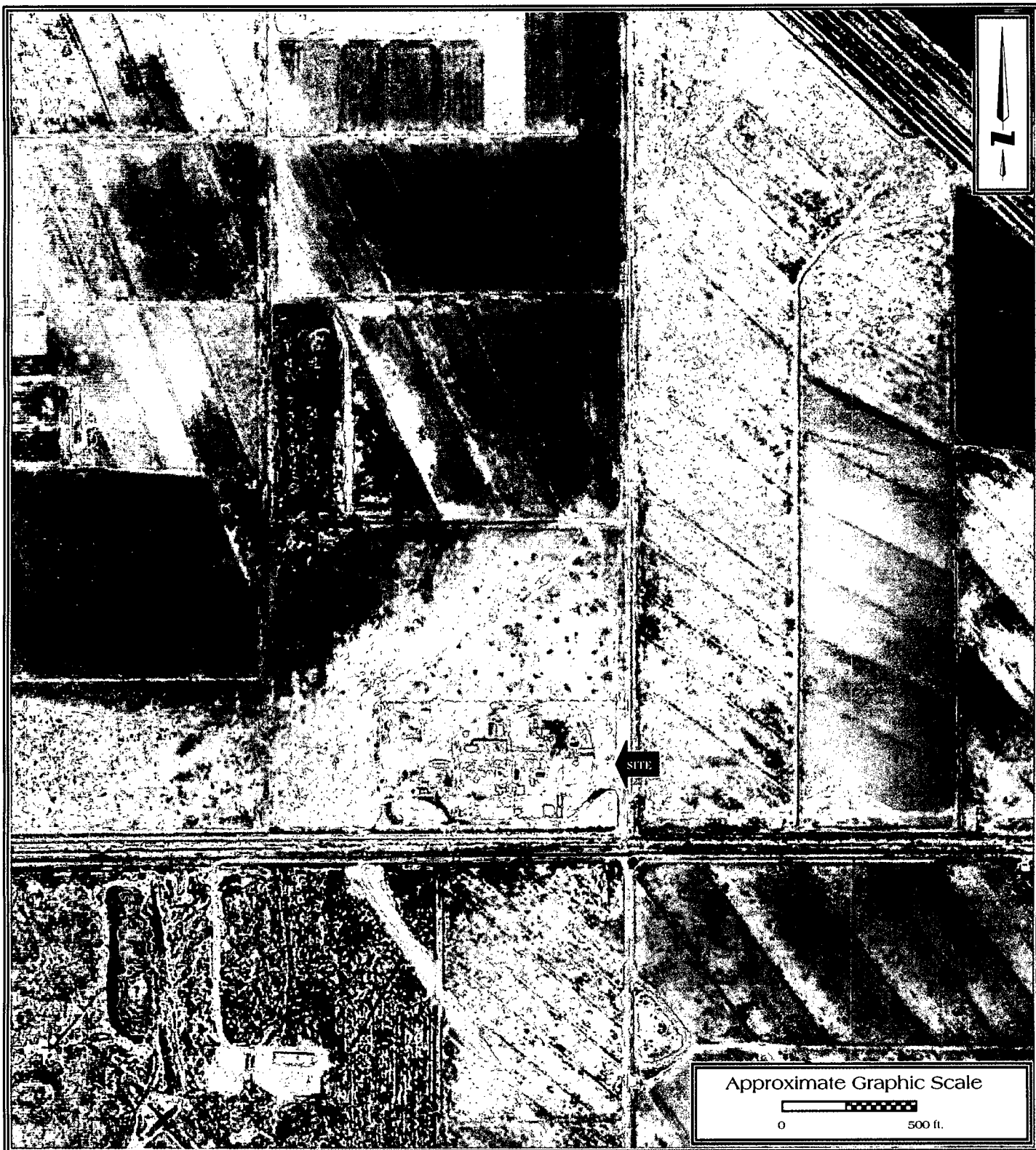


B. Chris Mitchell, P. G.  
Principal

**Attachments:**

Attachment A - Figures  
Attachment B - Tables





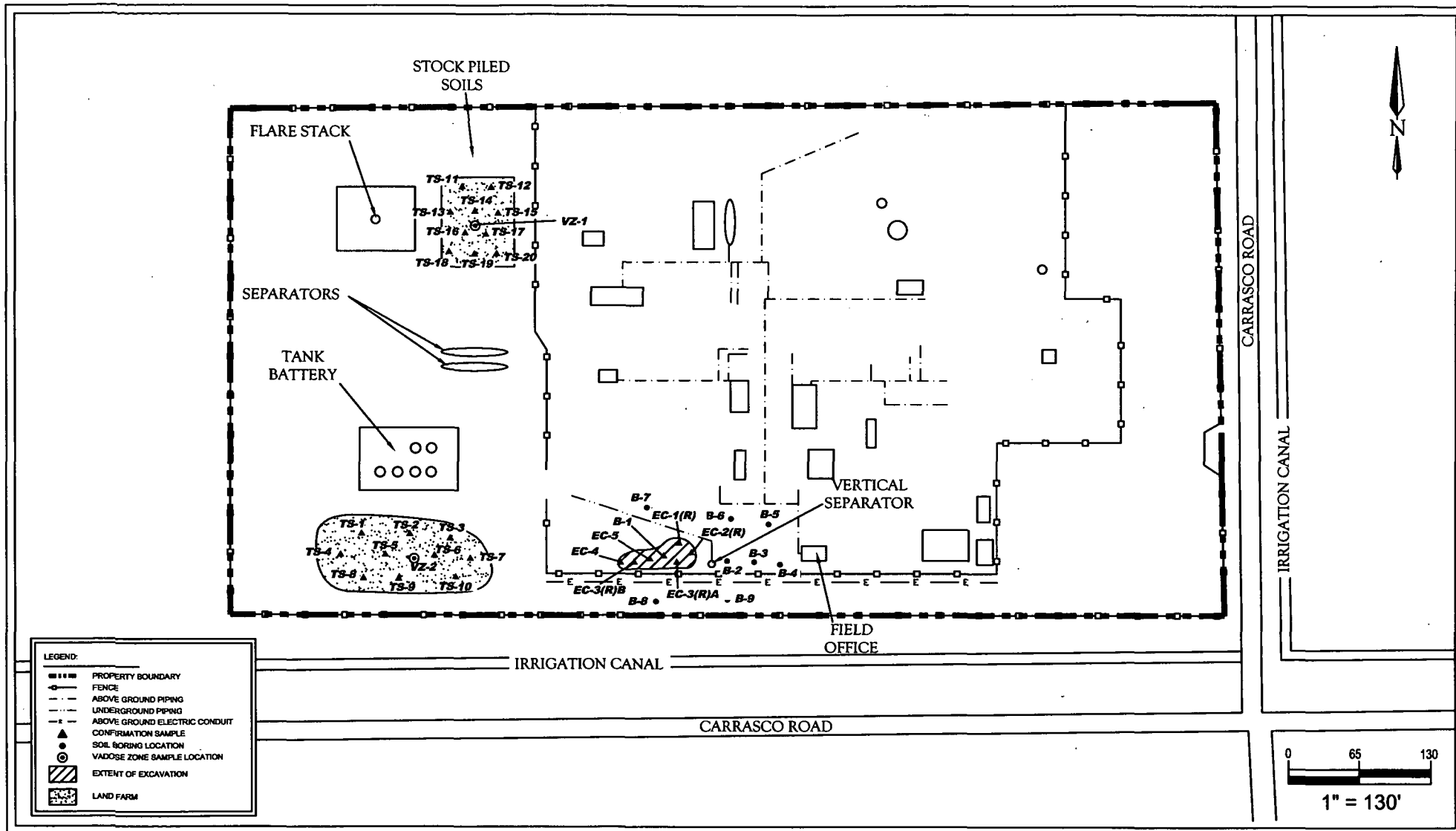
Corrective Action Report  
Enterprise Products Operating LLC  
S. Carlsbad Compressor Station  
Carrasco Road and CR 710  
Carlsbad, Eddy County, New Mexico

SWG Project No. 0210003

Southwest  
GEOSCIENCE

**FIGURE 2**  
Site Vicinity Map  
2009 Aerial Photograph





Corrective Action Report  
Enterprise Products Operating LLC  
S. Carlsbad Compressor Station  
Carrasco Road & CR 710  
Carlsbad, Eddy County, New Mexico

SWG Project No. 0210003

Southwest  
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FIGURE 3  
SITE MAP

TABLE 1 S. CARLSBAD COMPRESSOR STATION SOIL ANALYTICAL RESULTS - SOIL BORING and EXCAVATION CONFIRMATION SAMPLES										
Sample I.D.	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
New Mexico Energy, Minerals & Natural Resources Department, Oil Conservation Division, Remediation Action Level			NE	10	NE	NE	NE	50	1,000	
API Site-Specific, TPH Risk Based Screening Level for Residential Soils			NE	NE	NE	NE	NE	50	5,000	
B-1 (7-8)	11/5/2009	7 to 8	NA	0.34	7.1	1.5	31	39.94	270	710
B-1 (19-20)	11/5/2009	19 to 20	NA	<0.0021	<0.0022	<0.0024	0.036	0.036	0.15	24
B-2	2/25/2011	Soil Samples Not Collected								
B-3 (6-7)	2/25/2011	6 to 7	NA	0.0091	56.8	13.1	224	<b>293.9091</b>	<b>2,070</b>	<b>4,830</b>
B-4 (3-4)	2/25/2011	3 to 4	NA	<0.00131	<0.00131	<0.00131	<0.00394	<0.00787	<0.0657	4.17
B-4 (5-6)	2/25/2011	5 to 6	NA	<0.00133	0.00316	<0.00133	0.0198	0.02562	3.75	368
B-5 (4-5)	2/25/2011	4 to 5	NA	<0.00125	7.62	0.00991	29.4	37.03116	<b>1,540</b>	<b>2,520</b>
B-6 (4-5)	2/25/2011	4 to 5	NA	<0.00122	0.00847	<0.00122	0.0147	0.02561	1.12	25.5
B-6 (7-8)	2/25/2011	7 to 8	NA	<0.00128	7.17	4.15	46.3	<b>57.62128</b>	<b>1,930</b>	<b>2,210</b>
B-7 (2-3)	2/25/2011	2 to 3	NA	<0.00122	<0.00122	<0.00122	<0.00366	0.00732	<0.0612	7.98
B-7 (5-6)	2/25/2011	5 to 6	NA	<0.0012	2.23	2.28	10.5	15.0112	<b>960</b>	<b>1,480</b>
B-8 (4-5)	2/25/2011	4 to 5	NA	<0.00135	6.93	2.93	17.8	27.66135	<b>2,100</b>	<b>1,920</b>
B-8 (7-8)	2/25/2011	7 to 8	NA	<0.00119	<0.00119	<0.00119	<0.00358	<0.00715	<0.0597	199
B-9 (4-5)	2/25/2011	4 to 5	NA	<0.0012	0.00416	<0.0012	<0.00359	<0.01015	<0.0598	4.5
B-9 (7-8)	2/25/2011	7 to 8	NA	<0.00186	<0.00186	<0.00186	<0.00558	<0.01116	<0.0929	8.98
EC-1	1/31/2011	8 to 9	NA	<0.0125	13	9.23	103	125.2425	903	6,040
EC-1(R)	2/24/2011	8 to 9	NA	<0.0123	13.1	2.62	50.1	<b>65.8323</b>	<b>569</b>	<b>1,250</b>
EC-2	1/31/2011	8 to 9	NA	<0.00611	0.214	0.240	16.8	17.26011	1.34	4,530
EC-2(R)	2/24/2011	8 to 9	NA	<0.0127	7.98	0.836	25.4	34.2287	6,980	674
EC-2(R)*	2/24/2011	8 to 9	NA	NA	NA	NA	NA	NA	<b>835</b>	<b>2,050</b>
EC-3	1/31/2011	8 to 9	NA	<0.00128	0.00713	<0.00128	59.4	59.40969	1,260	5,200
EC-3(R)A	2/24/2011	8 to 9	NA	<0.0126	4.22	1.26	12.3	17.7926	<b>515</b>	<b>640</b>
EC-3(R)B	2/24/2011	8 to 9	NA	<0.00135	0.00204	<0.00135	<0.00406	0.0088	0.545	14.9
EC-4	1/31/2011	8 to 9	NA	<0.00126	<0.00126	<0.00126	<0.00379	<0.00757	0.722	44
EC-5	1/31/2011	14 to 15	NA	<0.0013	0.0156	0.04	0.123	0.1799	0.836	692

Note: Concentrations in bold and yellow exceed the applicable OCD Remediation Action Level

Note: Concentrations in bold and orange exceed the applicable calculated EPA API TPH RBSLs.

Note: Excavation confirmation samples shaded indicates the area was overexcavated or sample was resubmitted for analysis.

\* Indicates analysis of a new extraction from sample

NA = Not Analyzed

ND = Not Detected

NE = Not Established

TABLE 2  
S. CARLSBAD COMPRESSOR STATION  
SOIL ANALYTICAL RESULTS - TREATED SOILS

Sample I.D.	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
NMAC Small Landfill Closure Performance Standards			500	0.2	NE	NE	NE	50	500	
TS-1	3/24/2011	0 to 0.5	410	<0.19	<0.23	<0.23	<0.69	<1.34	140 (j)	1,600
TS-1 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	81 (j)	1,800
TS-1 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	570
TS-1 (R3)	11/3/2011	0 to 0.5	120	NA	NA	NA	NA	NA	<9.8	440
TS-2	3/24/2011	0 to 0.5	310	<0.019	<0.023	<0.023	<0.069	<0.134	8.3 (j)	770
TS-2 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	560
TS-2 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	470
TS-3	3/24/2011	0 to 0.5	600	<0.19	<0.23	<0.23	0.83 (j)	1.48	<80	1,700
TS-3 (R)	6/20/2011	0 to 0.5	290	NA	NA	NA	NA	NA	<30	1,400
TS-3 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	1,200
TS-3 (R3)	11/3/2011	0 to 0.5	120	NA	NA	NA	NA	NA	<24	1,200
TS-3 (R4)	12/6/2011	0.5 to 1	NA	NA	NA	NA	NA	NA	<4.8	270
TS-4	3/24/2011	0 to 0.5	270	<0.019	<0.023	<0.023	0.14 (j)	0.205	17 (j)	1,300
TS-4 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<15	820
TS-4 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<7.5	250
TS-5	3/24/2011	0 to 0.5	440	<0.019	<0.023	<0.023	<0.069	<0.134	<8.0	1,300
TS-5 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	1.6 (j)	14
TS-6	3/24/2011	0 to 0.5	190	<0.37	<0.46	<0.45	1.6 (j)	2.88	<160	2,000
TS-6 (R)	6/20/2011	0 to 0.5	NA	<0.018	<0.022	<0.021	<0.065	<0.126	<7.6	230
TS-7	3/24/2011	0 to 0.5	260	<0.019	<0.023	0.023 (j)	0.25 (j)	0.315	20 (j)	1,500
TS-7 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.6	56
TS-8	3/24/2011	0 to 0.5	350	<0.019	0.039 (j)	0.069 (j)	0.09	0.217	47	1,500
TS-8 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.6	<3.5
TS-9	3/24/2011	0 to 0.5	410	<0.019	<0.023	0.023 (j)	<0.069	0.134	<8.0	650
TS-9 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<8.0	270
TS-10	3/24/2011	0 to 0.5	110	<0.19	<0.23	<0.23	<0.69	<1.34	<80	1,000
TS-10 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<8.4	250

Note: Concentrations in bold and yellow exceed the applicable NMAC Small Landfill Closure Performance Standards  
(j) indicates that the analyte was reported at or above the Method Detection Limit and below the Practical Quantitation Limit  
NA = Not Analyzed  
NE = Not Established

TABLE 2 (Cont.)  
S. CARLSBAD COMPRESSOR STATION  
SOIL ANALYTICAL RESULTS - TREATED SOILS and VADOSE ZONE SAMPLES

Sample ID	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
NMAC Small Landfill Closure Performance Standards			500	0.2	NE	NE	NE	50	500	
TS-11	3/24/2011	0 to 0.5	160	<0.19	<0.23	<0.23	<0.69	<1.34	<80	1,800
TS-11 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	790
TS-11 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.5	350
TS-12	3/24/2011	0 to 0.5	160	<0.19	<0.23	<0.23	<0.69	<1.34	<80	1,400
TS-12 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<15	440
TS-13	3/24/2011	0 to 0.5	100	<0.37	<0.46	<0.45	<1.4	2.68	<160	1,900
TS-13 (R)	6/20/2011	0 to 0.5	NA	<0.24	<0.24	<0.24	<0.24	<0.48	<7.7	290
TS-14	3/24/2011	0 to 0.5	210	<0.19	<0.23	<0.23	<0.69	<1.34	<80	1,100
TS-14 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<15	500
TS-15	3/24/2011	0 to 0.5	210	<0.19	<0.23	<0.23	<0.69	<1.34	160 (j)	2,400
TS-15 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	17 (j)	430
TS-16	3/24/2011	0 to 0.5	230	<0.19	<0.23	<0.23	<0.69	<1.34	210 (j)	1,900
TS-16 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.5	73
TS-17	3/24/2011	0 to 0.5	320	<0.037	<0.046	<0.045	<0.14	<0.268	<16	1,200
TS-17 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	3.3 (j)	99
TS-18	3/24/2011	0 to 0.5	280	<0.19	<0.23	<0.23	<0.69	<1.34	<80	2,800
TS-18 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.6	63
TS-19	3/24/2011	0 to 0.5	290	<0.19	<0.23	<0.23	<0.69	<1.34	<80	2,700
TS-19 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<16	790
TS-19 (R2)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<7.5	330
TS-20	3/24/2011	0 to 0.5	230	<0.19	<0.23	<0.23	<0.69	<1.34	<80	2,200
TS-20 (R)	6/20/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<1.6	72
VZ-1	3/3/2012	3 to 3.25	460	<0.0047	<0.0081	<0.0039	<0.0160	<0.0327	<1.4	<5.4
VZ-2	3/3/2012	3 to 3.25	1,300	<0.0046	<0.0079	<0.0038	<0.0160	<0.0323	<1.3	<5.4

Note: Concentrations in bold and yellow exceed the applicable NMAC Small Landfill Closure Performance Standards.  
(j) Indicates that the analyte was reported at or above the Method Detection Limit and below the Practical Quantitation Limit.  
NA = Not Analyzed  
NE = Not Established

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Tuesday, July 17, 2012 12:23 PM  
**To:** 'Joseph Martinez'  
**Cc:** VonGonten, Glenn, EMNRD  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has completed its review the cover letter dated May 9, 2012 and 2R-422 Corrective Action Report dated May 1, 2012.

**Enterprise Products (EP) request(s) the following:**

- 1) Close the landfarms and reuse the remediated landfarm soils.
- 2) Close the cleanup based on Alternative Abatement Standards for the tank batter cleanup under the WQCC Regulations.
- 3) Cleanup capability is limited due to surface and subsurface infrastructure.
- 4) Source area has been vertically delineated.

**I. OCD Comments and/or Observations are:**

- 1) OCD notices that EP is requesting closure of the small landfarms based on the alternate abatement standards for cleanup under WQCC regulations, even though the landfarms are regulated under oil and gas regulations, i.e., 19.15.36 NMAC.
- 2) OCD requires its OCD risk-based spill guidance soil criteria for the cleanup of the tank battery release, i.e., Benzene (10 ppm); BTEX (50 ppm); and TPH (100 ppm) based on the depth to static water level below ground.
- 3) OCD notices that "small landfarm" cleanup standards under 19.15.36 NMAC have not yet been achieved.
- 4) OCD notices elevated chloride levels in Vadose Zone 2 within a landfarm area, which warrants resampling for confirmation.
- 5) The north face of the tank battery excavation EC-1(R) is contaminated; however, EP backfilled the excavation before receiving CA approval.
- 6) OCD presumes that SB-1 (not depicted on Figure 3) is located at the leaky tank battery (natural gas condensate/product liquids) or point source. If not, OCD requires investigation similar to B.1 below.
- 7) Geoprobe investigation method resulted in refusal at relatively shallow depth and may not have been the preferred investigation technique. Air rotary is capable of achieving depth and environmental information needed to conclude the release is localized to the upper 10 ft. as theorized by EP.

**II. OCD conclusions and/or recommendations are:**

**A. Small Landfarm**

- 1) C-137EZ Forms for each (2) small landfarm with supporting soils quality information that meets the criteria must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm) and TPH < 2,500 ppm. The closure standards have not been met under OCD oil and gas regulations.
- 2) Another sample from VZ2 is required to confirm the chloride exceedance in soils.

**B. Vadose Zone Tank Battery Excavation**

- 1) An air rotary drilled soil boring to water table with water table sample collection and field VOC field monitoring is required near SB-3 and SB-1 (tank battery source area) to confirm the condition of the vadose zone and that phase separated hydrocarbons are not present in the subsurface. If contamination is present, a minimum 2 inch diameter monitor well shall be installed with 15 ft. of screen (5 ft. above the water table and 10 ft. below the water table) and monitored quarterly to assess any impact to ground water.

OCD notices that EP states that a subsurface sandstone unit impermeable and drilling terminated in SB-1 before the water table was encountered and sampled.

- 2) More delineation of the excavation toward the N, NE and E and NW may be required based on the soil boring installation above.

Please contact me to discuss. Thank you.

Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

Office: (505) 476-3490

E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

Website: <http://www.emnrd.state.nm.us/ocd/>

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---

**From:** Chavez, Carl J, EMNRD

**Sent:** Wednesday, July 11, 2012 3:28 PM

**To:** 'Joseph Martinez'

**Cc:** Dade, Randy, EMNRD; Bratcher, Mike, EMNRD

**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Mr. Martinez:

I now have the 2R-422 CA Report and will prioritize both this and the 2R-423 CA Reports for review.

I will contact you soon to discuss and/or send you an e-mail with any final comments/questions to consider for approval and/or with conditions of approval.

Thank you.

Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

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E-mail: [CarlJ.Chavez@State.NM.US](mailto:CarlJ.Chavez@State.NM.US)

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**From:** Joseph Martinez [<mailto:Joseph.Martinez@southwestgeoscience.com>]

**Sent:** Monday, July 02, 2012 3:14 PM

**To:** Chavez, Carl J, EMNRD  
**Cc:** Dade, Randy, EMNRD; Bratcher, Mike, EMNRD  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

I will ensure that you get a copy of the report for 2R-423.

Have you been able to review the report for 2R-422 yet? If so, can you tell me what if any further action will be required?

Thanks,

Joseph W. Martinez | Manager, South Texas  
Southwest Geoscience

8829 Tradeway Street | San Antonio, Texas 78217  
☎ 210.804.9922 | 📠 210.804.9944 | C 210.355.6280

[www.southwestgeoscience.com](http://www.southwestgeoscience.com)

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**From:** Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]  
**Sent:** Wednesday, June 20, 2012 3:18 PM  
**To:** [Joseph.Martinez@southwestgeoscience.com](mailto:Joseph.Martinez@southwestgeoscience.com)  
**Cc:** Dade, Randy, EMNRD; Bratcher, Mike, EMNRD  
**Subject:** FW: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

One more time....

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
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**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, June 20, 2012 2:08 PM  
**To:** 'Joseph.Martinez@southwestgeoscience.com'  
**Cc:** Dade, Randy, EMNRD; Bratcher, Mike, EMNRD  
**Subject:** New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Dear Mr. Martinez:

Good afternoon. I am writing to inform you that I am the lead for the OCD on the corrective actions (CAs) for 2RP 422 and 423 from now on. You may now deal directly with me here at the OCD Santa Fe (SF) Office.

The OCD Artesia Office is sending me the most recent CA report for 2R-422, but the OCD does not appear to have the CA report for the 2R-423. Therefore, could you please send me the CA report for the CA? My contact information is provided below.

Thank you.

**From:** Joseph Martinez [<mailto:Joseph.Martinez@southwestgeoscience.com>]  
**Sent:** Wednesday, June 20, 2012 9:35 AM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Rodney Sartor  
**Subject:** OCD Permit No. 2R-422

Mr. Bratcher,

Southwest Geoscience (SWG) was contracted to perform and document recent corrective action activities on the Enterprise S. Carlsbad Compressor Station facility (OCD Permit No. 2R-422). It is my understanding that you are assigned to this project as the OCD coordinator. SWG issued a Corrective Action Report on May 1, 2012 which documented on-site corrective actions and was sent to your attention by Enterprise on May 9, 2012. Mr. Rodney Sartor of Enterprise stated that you had been in contact recently by phone to inquire additional details on this facility. It was his understanding that you would be requesting further review of the report by Mr. Carl Chavez of the OCD District 4 office and that additional investigation or corrective action activities may be required. Can you tell me what the status is on the report review and whether you anticipate further action being required?

Thanks,  
Joseph W. Martinez | Manager, South Texas  
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## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, July 11, 2012 11:11 AM  
**To:** 'Joseph Martinez'  
**Cc:** Dade, Randy, EMNRD; Bratcher, Mike, EMNRD  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 422 and 423 CAs

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) Santa Fe Office is in receipt of the 2R-423 Corrective Action Report and will respond soon.

Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Department  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Drive, Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
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One more time....

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## Chavez, Carl J, EMNRD

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**Cc:** Rodney Sartor  
**Subject:** OCD Permit No. 2R-423

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## Chavez, Carl J, EMNRD

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, October 21, 2010 9:06 AM  
**To:** 'Gregg, Russell'  
**Cc:** Dade, Randy, EMNRD  
**Subject:** RE: Trunk A Separator Facility & South Carlsbad C.S. Corrective Actions

Gregg:

Thanks for the notification.

FYI.

The "Trunk A" has a permit number of "2R-423."

The South Carlsbad C.S. has a permit number of :2R-422."

You may access the OCD file at OCD Online at <http://ocdimage.emnrd.state.nm.us/imaging/AEOrderCriteria.aspx>.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

---

**From:** Gregg, Russell [mailto:[RDGREGG@eprod.com](mailto:RDGREGG@eprod.com)]  
**Sent:** Thursday, October 21, 2010 8:33 AM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** Trunk A Separator Facility & South Carlsbad C.S. Corrective Actions

Carl, let this serve as our notification to commence work per the approved Work Plan for the Trunk A Separator and South Carlsbad Compressor Station in Carlsbad, New Mexico. Work will begin Tuesday October 25<sup>th</sup> and should be completed Saturday October 30. Our plan for next week is below. If you have any questions or comments feel free to contact me at anytime.

Trunk A:

- Excavate approximately 1,100 cubic yards of soil (approximate dimensions being 60 ft long by 25 ft wide and 20 ft deep) from the former storage tank battery containment area.
- Place affected soils in onsite treatment cell and treat with the direct application of a bioremediation agent/water mixture .

South Carlsbad C.S.

- Excavate approximately 250 cubic yards of soil (approximate dimensions being 20 ft long by 20 ft wide and 15 ft deep) from the former storage tank battery containment area.
- Place affected soils in onsite treatment cell and treat with the direct application of a bioremediation agent/water mixture.

Thanks,  
Russell

Russell D. Gregg  
Environmental Scientist  
**Enterprise Products**  
1100 Louisiana St  
Houston, TX 77002  
O: 713-381-8327  
M:832-316-8933

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## Chavez, Carl J, EMNRD

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, July 29, 2010 3:34 PM  
**To:** Dade, Randy, EMNRD  
**Cc:** Bonham, Sherry, EMNRD  
**Subject:** Enterprise Products CA or Response Plans for "2R-422" South Carlsbad CS and "2R-423" Trunk "A" Separator (Eddy County)

Randy:

FYI, I created a couple of 2R designations for Sherry Bonham during her medical leave absence. Glenn and I think Daniel Sanchez placed the two work plans in my in-basket when he returned from the Artesia Office a while back. The work plans and general correspondence files should be online by tomorrow COB if you wish to follow-up with Russell Gregg on any forms that need to be completed etc. and or notice when field work begins.

Enterprise submitted Abatement Plans, but OCD handled them as Corrective Actions instead.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
(Pollution Prevention Guidance is under "Publications")

## Chavez, Carl J, EMNRD

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**From:** Gregg, Russell [RDGREGG@eprod.com]  
**Sent:** Tuesday, July 13, 2010 9:04 AM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE: South Carlsbad Compressor Station and Trunk A Separator Facility Corrective Actions

Carl,

Thank you for the prompt approval. I will provide you with an updated start date for each location once our schedule is finalized.

Thank you,

Russell D. Gregg  
Environmental Scientist  
Enterprise Products  
1100 Louisiana St  
Houston, TX 77002  
O: 713-381-8327  
M: 832-316-8933

Please note that my email address has changed to [rdgregg@eprod.com](mailto:rdgregg@eprod.com)

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**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Tuesday, July 13, 2010 9:01 AM  
**To:** Gregg, Russell  
**Cc:** Dade, Randy, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** South Carlsbad Compressor Station and Trunk A Separator Facility Corrective Actions

Mr. Gregg:

The OCD is in receipt of your Corrective Action Work Plans for the above facilities.

The OCD hereby approves the proposed corrective actions.

Please provide notification when the work is to be conducted and please contact me if you have questions. Thank you.

*Please be advised that NMOCD approval of this plan does not relieve Enterprise Products of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Enterprise Products of responsibility for compliance with any other federal, state, or local laws and/or regulations.*

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3490  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>  
(Pollution Prevention Guidance is under "Publications")

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## South Carlsbad CS

Figure: 1

New Mexico Oil Conservation Division

Jun 23, 2010

