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By OCD; Dr. Oberding at 8:52 am, Nov 16, 2015



Tasman Geosciences

November 13, 2015

Dr. Tomáš Oberding
Hydrologist, Adv-District 1
Oil Conservation Division, EMNRD
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

**RE: No Further Action Site Closure Request
X-Line Pipeline Release
1RP-400-0**

APPROVED

By OCD; Dr. Oberding at 10:56 am, Nov 16, 2015

Dear Mr. Oberding:

Tasman Geosciences (Tasman) has prepared this No Further Action (NFA) Site Closure Request Letter (NFA Letter) on behalf of DCP Midstream, LP (DCP) for the X-Line Pipeline Release (Site) located on the Etcheverry Ranch in Lea County, New Mexico (Figure 1). A brief description of Site activities justifying this NFA Letter as well as anticipated site closure activities are provided below.

X-Line Site Background

Natural gas gathering operations conducted on the Etcheverry Ranch resulted in a historic release of natural gas fluids on the property in 2001. Remediation of the release at the X-Line Site has been conducted subsequent to that time under the guidance of the New Mexico Oil Conservation Division (NMOCD). A Settlement and Access Agreement was entered into on April 21, 2003 between Duke Energy Field Services (now DCP Midstream [DCP]) and the property landowner.

Remediation efforts were conducted at the X-Line Site in order to remove the presence of benzene, toluene, ethylbenzene, and xylene (BTEX) constituents in soil and groundwater. Remediation activities included the following:

- Soil excavation, which resulted in the removal and disposal of approximately 6,746 cubic yards of impacted soil in January through March 2002.
- Light Non-Aqueous Phase Liquid (LNAPL) recovery during July 2003 through July 2004.
- Air Sparge / Soil Vapor Extraction (AS/SVE) remediation was conducted from June 2003 through the second quarter of 2012. Figure 2 illustrates the location of the AS/SVE remediation system.

The remediation efforts above were detailed within regular groundwater monitoring and remediation reports submitted to the NMOCD. In addition, quarterly groundwater sample

collection was conducted at monitoring wells MW-1 through MW-8 (Figure 2) between April 2002 and July 2014 to monitor the remediation efforts.

Based on the groundwater sampling activities described above, BTEX constituents have been below their respective NMOCD regulatory goals since June 2012, representing nine (9) quarters of analytical results below NMOCD regulatory standards (Table 1). The passage of a minimum 8 quarters of groundwater data complies with the NMOCD threshold to pursue a NFA Determination associated with the project. Please refer to the Second Quarter 2014 Groundwater Monitoring and Summary Report (August 4, 2014) for historic groundwater analytical results.

Site Closure Activities

Site closure activities shall be conducted within a reasonable period of time following approval of this NFA Letter from the NMOCD or other written communication regarding acceptance of the proposed closure from the regulatory agency. Anticipated Site closure activities include removal of all surface remediation equipment and appurtenances relating to Site remediation and monitoring activities which includes a total of eight (8) groundwater monitoring wells, 14 AS remediation wells, and 8 SVE remediation wells as illustrated on Figure 2. Each well will be plugged and abandoned in accordance with applicable State standards and requirements.

Site restoration activities will be conducted in accordance with the 2003 Settlement and Access Agreement executed between the landowner and DCP.

Should you have any questions regarding this NFA Letter and the activities discussed herein, please contact me by phone at (303) 487-1228 or by e-mail at bhumphrey@tasman-geo.com.

Sincerely,



Brian Humphrey
Project Manager
Tasman Geosciences
6899 Pecos St., Unit C
Denver, CO 80221

Enclosures:

Table 1 – Summary of BTEX Concentrations in Groundwater

Figure 1 – Site Location Map

Figure 2 – Site Layout Overview Map

cc:

Steve Weathers – DCP Midstream, LP
file

TABLES

**TABLE 1
SUMMARY OF BTEX CONCENTRATIONS IN GROUNDWATER
X-LINE PIPELINE RELEASE - ETCHEVERRY RANCH
LEA COUNTY, NEW MEXICO**

| Location Identification | Sample Date | Benzene (mg/l) | Toluene (mg/l) | Ethylbenzene (mg/l) | Total Xylenes (mg/l) | Comments |
|---|-------------|----------------|----------------|---------------------|----------------------|----------------------------|
| New Mexico Water Quality Control Commission Groundwater Standards (mg/L) | | 0.01 | 0.75 | 0.75 | 0.62 | |
| MW-1 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | Duplicate sample collected |
| MW-1 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-1 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-2 | 6/8/2012 | <0.001 | <0.002 | 0.00067 | 0.0056 | |
| MW-2 | 9/10/2012 | <0.001 | <0.002 | 0.0089 | 0.0721 | |
| MW-2 | 12/7/2012 | <0.001 | <0.002 | 0.0079 | 0.0665 | |
| MW-2 | 2/20/2013 | <0.001 | <0.002 | 0.0045 | 0.0364 | |
| MW-2 | 6/2/2013 | <0.001 | <0.002 | 0.0108 | 0.0856 | |
| MW-2 | 9/9/2013 | <0.001 | <0.002 | 0.0036 | 0.0213 | |
| MW-2 | 12/2/2013 | <0.001 | <0.002 | 0.0048 | 0.0119 | |
| MW-2 | 2/28/2014 | <0.001 | <0.002 | 0.0054 | 0.0245 | |
| MW-2 | 7/14/2014 | <0.001 | <0.002 | 0.0059 | 0.0176 | |
| MW-3 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-3 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-4 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-5 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |

TABLE 1
SUMMARY OF BTEX CONCENTRATIONS IN GROUNDWATER
X-LINE PIPELINE RELEASE - ETCHEVERRY RANCH
LEA COUNTY, NEW MEXICO

| Location Identification | Sample Date | Benzene (mg/l) | Toluene (mg/l) | Ethylbenzene (mg/l) | Total Xylenes (mg/l) | Comments |
|---|-------------|----------------|----------------|---------------------|----------------------|----------------------------|
| New Mexico Water Quality Control Commission Groundwater Standards (mg/L) | | 0.01 | 0.75 | 0.75 | 0.62 | |
| MW-6 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-6 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 9/10/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 12/7/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 2/20/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 6/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 9/9/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 12/2/2013 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 2/28/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-7 | 7/14/2014 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-8 | 6/8/2012 | <0.001 | <0.002 | <0.002 | <0.003 | |
| MW-8 | 9/10/2012 | 0.00086 | <0.002 | 0.00066 | 0.002 | Duplicate Sample Collected |
| MW-8 | 12/7/2012 | 0.00063 | <0.002 | 0.00086 | <0.003 | Duplicate Sample Collected |
| MW-8 | 2/20/2013 | 0.00045 | <0.002 | 0.0019 | 0.0022 | Duplicate Sample Collected |
| MW-8 | 6/2/2013 | 0.00043 | <0.002 | 0.00098 | 0.0037 | Duplicate Sample Collected |
| MW-8 | 9/9/2013 | 0.00044 | <0.002 | <0.002 | <0.003 | Duplicate Sample Collected |
| MW-8 | 12/2/2013 | 0.00044 | <0.002 | <0.002 | 0.0028 | Duplicate Sample Collected |
| MW-8 | 2/28/2014 | 0.00042 J | <0.002 | 0.00036 J | 0.0034 | Duplicate Sample Collected |
| MW-8 (Duplicate) | 2/28/2014 | 0.00045 J | <0.002 | 0.00026 J | 0.0028 J | |
| MW-8 | 7/14/2014 | 0.00051 J | <0.002 | 0.001 J | 0.003 | Duplicate Sample Collected |
| MW-8 (Duplicate) | 7/14/2014 | 0.00053 J | <0.002 | 0.00097 J | 0.003 | |

Notes:

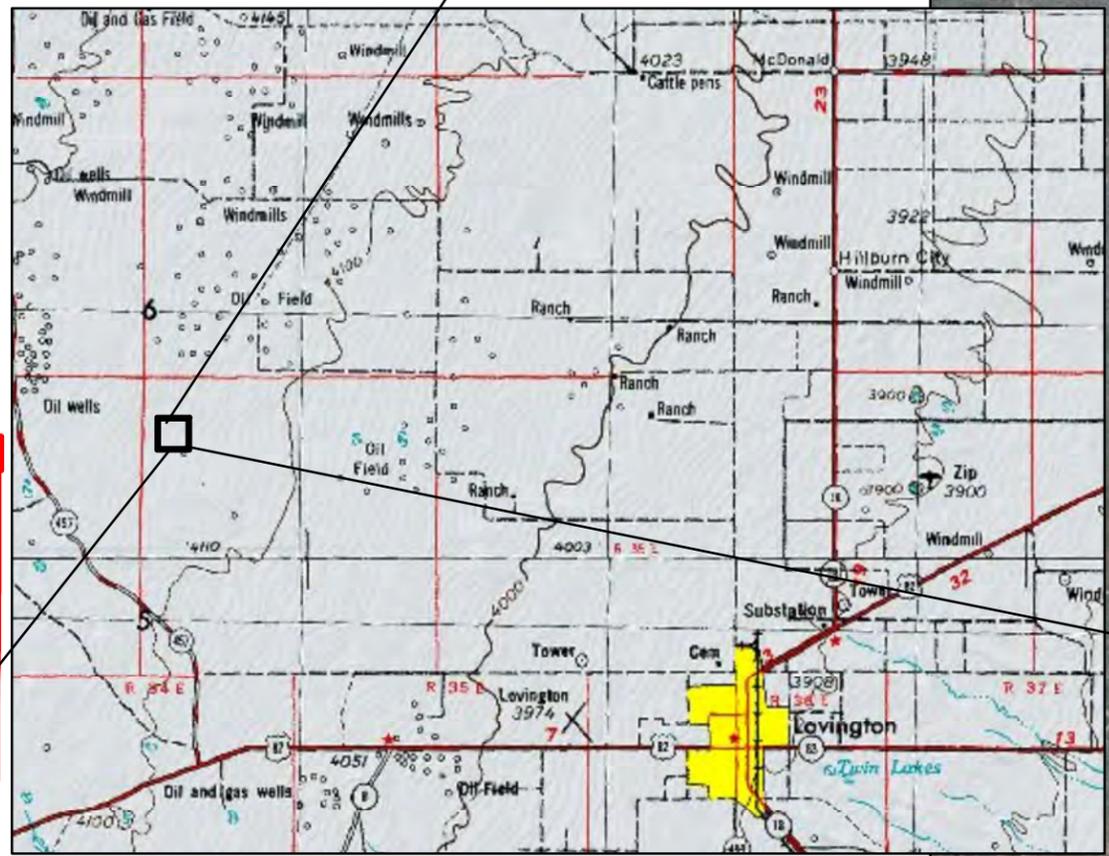
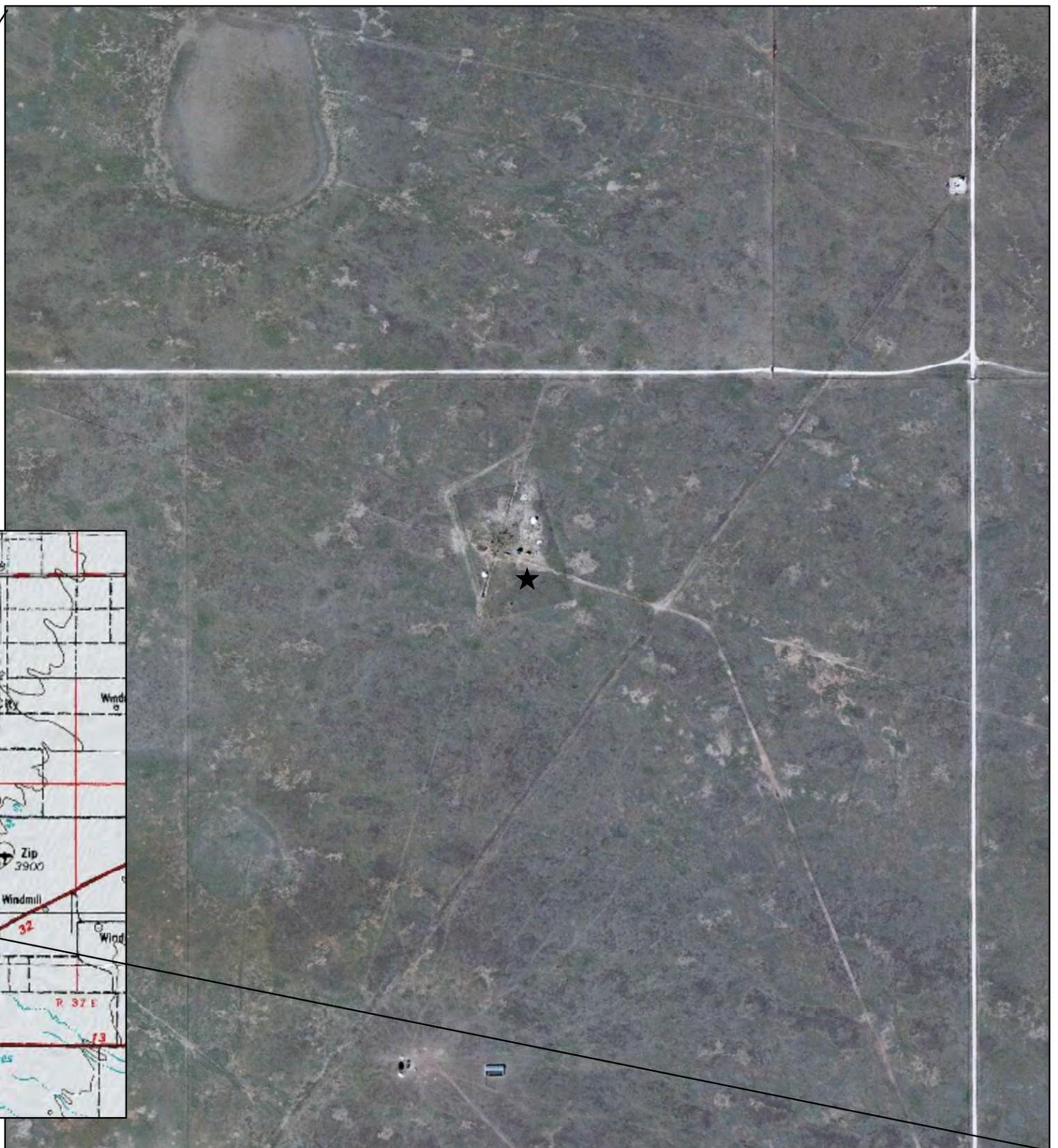
The environmental cleanup standards for water that are applicable to this Site are the New Mexico Water Quality Control Commission (NMWQCC) Groundwater Standards.

Sample locations are shown on Figure 2.

mg/L = milligrams per liter.

J = Indicates an estimated value

FIGURES



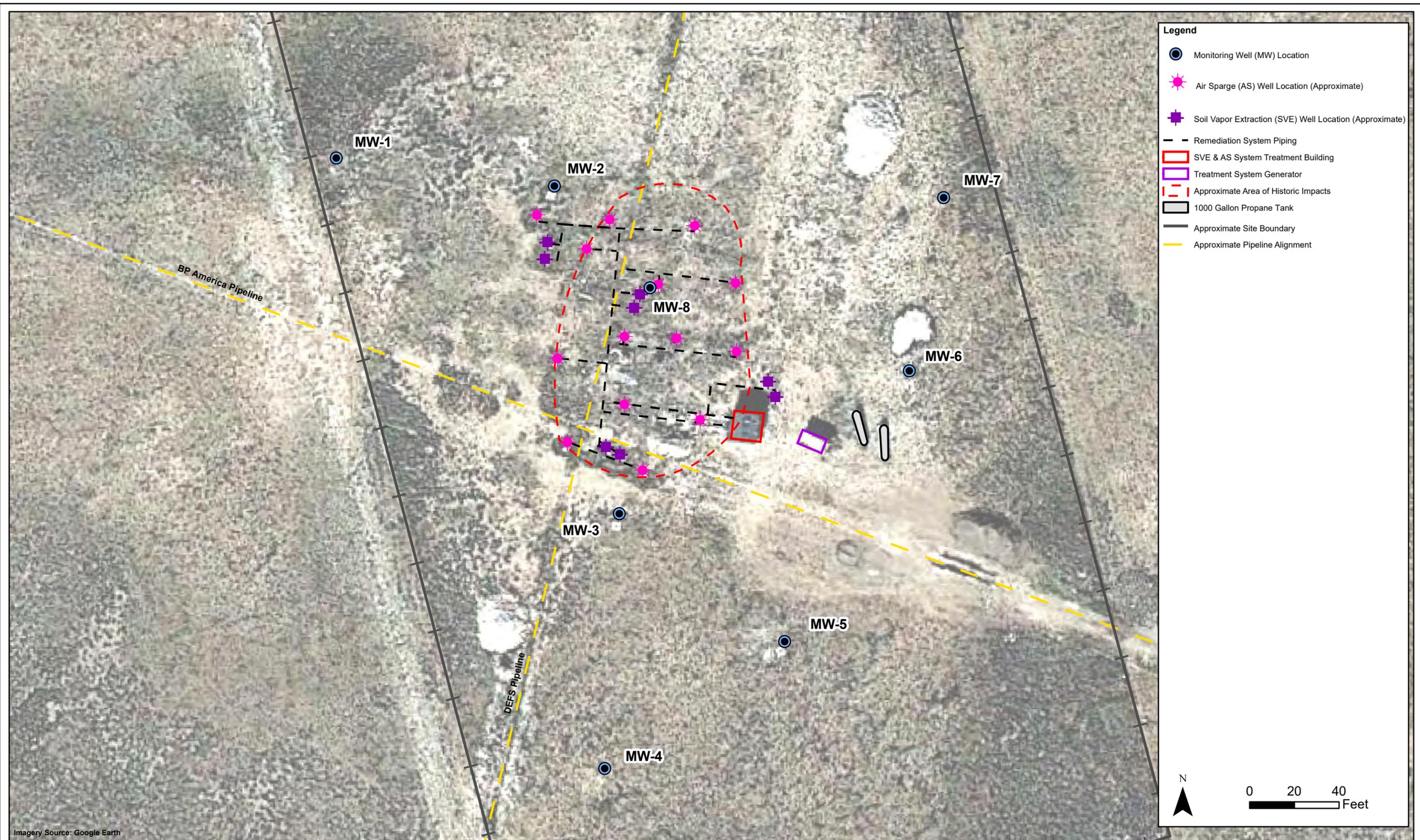
DATE: April 2014
DESIGNED BY: T. Johansen
DRAWN BY: D. Arnold

 **TASMAN** GEOSCIENCES
Tasman Geosciences, LLC
6899 Pecos Street - Unit C
Denver, CO 80221

DCP Midstream
X-Line Pipeline Release
Unit B, Section 7, Township 15 South, Range 34 East
Lea County, New Mexico

Site Location
Map

Figure
1



DATE: March 2015
 DESIGNED BY: T. Johansen
 DRAWN BY: D. Arnold



**DCP Midstream
 X-Line Pipeline Release**
 Unit B, Section 7, Township 15 South, Range 34 East
 Lea County, New Mexico

Site Layout
 Overview Map

Figure
 2