

From: [Eads, Cristina, EMNRD](#)
To: ["Stoffel, Jared"; Thompson, Glen D](#)
Subject: RE: [EXTERNAL] RE: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE
Date: Tuesday, December 22, 2020 2:46:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Jared,

Your sampling plan is approved with the following conditions:

- No sooner than 72 hours after the R3mediate treatment has been applied to the affected area, all 96 samples will be collected and analyzed for Chlorides, BTEX, and TPH.
- If chlorides are present in any samples during the initial sampling event, soil samples may need to be analyzed for chlorides in following sampling events.

Please let me know if you have any questions or concerns.

Thank you,

Cristina Eads • Environmental Specialist - A
Environmental Bureau
EMNRD - Oil Conservation Division
5200 Oakland Ave, Suite100 | Albuquerque, NM 87113
505.670.5601 | Cristina.Eads@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>

From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Friday, December 18, 2020 11:41 AM
To: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Thompson, Glen D <Glen_Thompson@kindermorgan.com>
Subject: [EXT] RE: [EXTERNAL] RE: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE

Christina,

Thank you very much for the clarification; I think that you've addressed all the questions. I do have a final request regarding sampling frequency – near the approval date we had discussed what sampling frequency would be acceptable to request without deviating too much from the spill rule, and I'd like to request a sampling variation that you had recommended –

The footprint of the Release is approximately 76,500 square feet. I have attached the map provide by the workplan as well as my kmz approximation for your reference. Based on the 200 square foot confirmation sampling rule, this would require approximately 387 soil sample locations within the heavily stained area. I would like to propose that we sample with a frequency of 1 sample every 800 square feet. This will reduce the number of samples to approximately 96 samples. We typically grid the remediated area off, so in this instance our grid would be an approximately 28' x 28' grid. Within each grid square, a random five (5) point composite will be collected from the 0-6" interval.

For convenience, I have marked the approximate 'centerpoint' of each grid box on the kmz. In addition, we expect to have chlorides below NMOCD regulatory guidelines in the confirmation samples, and do not believe our Release to be a source of chlorides. For that reason, we would like to request that we sample chlorides the during the first round of sampling and omit chloride analysis (BTEX and TPH only) for the 2 subsequent semiannual sampling events? Finally, I would like to propose that we sample the odd numbered points only for the first semiannual event (6 months after Re3mediate application) and only the even numbered points at the second semiannual event (12 months after Re3mediate application).

If you find this acceptable, please let me know. Thank you very much, and have a wonderful weekend!

Jared Stoffel, P.G.
Project Manager



505 E Huntland Dr STE 250 Austin, TX 78752

F: 512 329 8750 | C: 432 238 3003

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Please note that our domain name and email addresses have changed

From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Sent: Thursday, December 17, 2020 2:08 PM

To: Stoffel, Jared <JStoffel@trccompanies.com>; Thompson, Glen D
<Glen_Thompson@kindermorgan.com>

Subject: RE: [EXTERNAL] RE: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE

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Jared,

You're right, the due dates were never discussed. I would expect to receive a report no more than 60 days after the sampling event took place. This should be noted in the semi-annual reports. As each report is reviewed, the incident file will be updated to reflect the new due date of the subsequent report (semi-annual or closure) to follow. You will not need to make any more requests for extensions unless you find you are unable to meet the established deadlines. Given you find the R3mediate treatment was effective after the final scheduled sampling event, you can make the closure request by submitting the final report and Closure C-141 through ePermitting.

As for the reports of the sampling events, which would essentially be only status updates, you can submit those to me via email.

Your 90 day extension request is approved. The new due date for your first sampling report will be February 24, 2021.

I believe I covered all of your questions, but please let me know if there is something I failed to address or if you have any additional questions.

Thank you,

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From: Stoffel, Jared <JStoffel@trccompanies.com>
Sent: Thursday, December 17, 2020 4:28 AM
To: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; Thompson, Glen D <Glen_Thompson@kindermorgan.com>
Subject: [EXT] RE: [EXTERNAL] RE: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE

Christina,

I wanted to reach out to request a three month extension for this project. We have been working with the NMSLO to get approval for a ROW access agreement, and that has held our remediation efforts up to this point. My understanding is that we should have access in the near future, and should be able to begin remediation within the extended window. Also, I was curious as to how our typical due dates of 90 days apply to this project, since it has a semi-annual component. Do I need to request extensions until after the final semi-annual event? Would you like an initial remediation report and subsequent final request for closure report, or just a final report following the final event? Please let me know how I can best accommodate the extended timeline for this project. Thank you very much!

Jared Stoffel, P.G.
Project Manager



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From: Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>
Sent: Thursday, September 24, 2020 11:40 AM
To: Thompson, Glen D <Glen_Thompson@kindermorgan.com>

Cc: Stoffel, Jared <JStoffel@trccompanies.com>

Subject: [EXTERNAL] RE: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE

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Glen,

An additional condition has been added to the approval of the remediation plan. Laboratory sample analysis will include testing for BTEX, TPH, and Chlorides. If chloride levels exceed applicable Table I Closure Criteria for this incident during initial confirmation sampling, additional investigation or remediation will need to take place. If chloride levels do not exceed applicable Table I Closure Criteria for this incident during the initial confirmation sampling, laboratory sample analysis will include testing for only BTEX and TPH.

Thank you,

Cristina Eads | 505-670-5601

From: Eads, Cristina, EMNRD

Sent: Friday, August 28, 2020 3:01 PM

To: Thompson, Glen D <Glen_Thompson@kindermorgan.com>

Cc: 'Stoffel, Jared' <JStoffel@trccompanies.com>; Mike EMNRD Bratcher (mike.bratcher@state.nm.us) <mike.bratcher@state.nm.us>; Robert EMNRD Hamlet (Robert.Hamlet@state.nm.us) <Robert.Hamlet@state.nm.us>; Victoria EMNRD Venegas (Victoria.Venegas@state.nm.us) <Victoria.Venegas@state.nm.us>

Subject: NAB1927162165 NATUAL GAS PIPELINE INDIAN BASIN LINE @ L-36-17S-27E ON OE

Glen,

The OCD has approved the Site Characterization and Remediation Plan for incident # NAB1927162165 with the following conditions:

- The responsible party. will sample the areas treated with silica encapsulation every six months for one year after initial confirmation sampling indicates the contaminated areas have been effectively treated If the responsible party chooses not to perform the additional sampling, the contaminated areas can be remediated by methods already approved by the division.

The signed C-141 can be found in the online image data base under the incident #. Please let me know if you have any questions.

Thanks,

Cristina Eads

Environmental Bureau

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OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.