NM OIL CONSERVATION
ARTESIA DISTRICT

JUN 12 2017

RECEIVED

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
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

fAB1715040213

# Release Notification and Corrective Action

## OPERATOR

☒ Initial Report ☐ Final Report

| | |
|---|---|
| Name of Company: El Paso Natural Gas Company, LLC (a Kinder Morgan owned company) 7046 | Contact Sheila Castellano |
| Address: approximately 1.5 miles south of HW404 and 1.1 miles west of CR213(War Road) | Telephone No. (719) 520-3719 |
| Facility Name: El Paso Natural Gas Company Line No. 1100 | Facility Type 26-inch Natural Gas Pipeline |

| | | |
|---|---|---|
| Surface Owner: Bureau of Land Management | Mineral Owner: BLM | API No. |

## LOCATION OF RELEASE

| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
|---|---|---|---|---|---|---|---|---|
| O | 30 | 26S | 5E | | | | | Dona Ana County, NM |

**Latitude** 32.001699N **Longitude** -106.469646

## NATURE OF RELEASE

| | | |
|---|---|---|
| Type of Release Inadvertent release of hydrostatic test water | Volume of Release approximately 630 gallons | Volume Recovered 630 gallons |
| Source of Release 26-inch natural gas pipeline | Date and Hour of Occurrence 5/25/17 11:45a MDT | Date and Hour of Discovery 5/25/17 11:45a MDT a MDT |
| Was Immediate Notice Given? X Yes ☐ No ☐ Not Required | If YES, To Whom? NMOCD Santa Fe Office: Jim Griswold NMOCD District 1 Office: Mike Bratcher | |
| By Whom? Sheila Castellano | Date and Hour 5/25/17 4:00p MDT | |
| Was a Watercourse Reached? ☐ Yes X No | If YES, Volume Impacting the Watercourse. | |

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
EPNG was conducting a hydrostatic spike test of the existing L1100. During transfer of test water from one test section into the next, a valve in the test manifold was opened to release the air pressure as the pig entered the test manifold. Hydrostatic test water was inadvertently discharged into the open trench below. A sample of the hydrostatic test water was collected for analysis. All hydrostatic water discharged into the trench (bellhole) was collected and will be disposed of accordingly. A soil sample was collected from the location after all discharged material had been taken from the site.

BLM was notified of the inadvertent release and subsequent sample collection and pending analysis.

Describe Area Affected and Cleanup Action Taken.*
The inadvertent release of hydrostatic test water was fully contained on the right of way, within the open trench below the test manifold, measuring approximately 100-ft long x 10-ft wide x 6-ft deep. Analysis results are pending.

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.

| | |
|---|---|
| Signature: Sheila F. Castellano | OIL CONSERVATION DIVISION |
| Printed Name: Sheila F. Castellano | Signed By Mike Bratcher<br>Approved by Environmental Specialist: |
| Title: Consultant/Contractor | Approval Date: 6/14/17 Expiration Date: N/A |
| E-mail Address: sheila_castellano@kindermorgan.com | Conditions of Approval: See attached Attached ☐ |
| Date: June 12, 2017 Phone: (719) 520-3719 | |

* Attach Additional Sheets If Necessary

2RP-4252

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 6/12/2017 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4252 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

> *The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC.* [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 7/12/2017. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; $C_6$ thru $C_{36}$), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

- Nominal detection limits for field and laboratory analyses must be provided.

- Composite sampling is not generally allowed.

- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

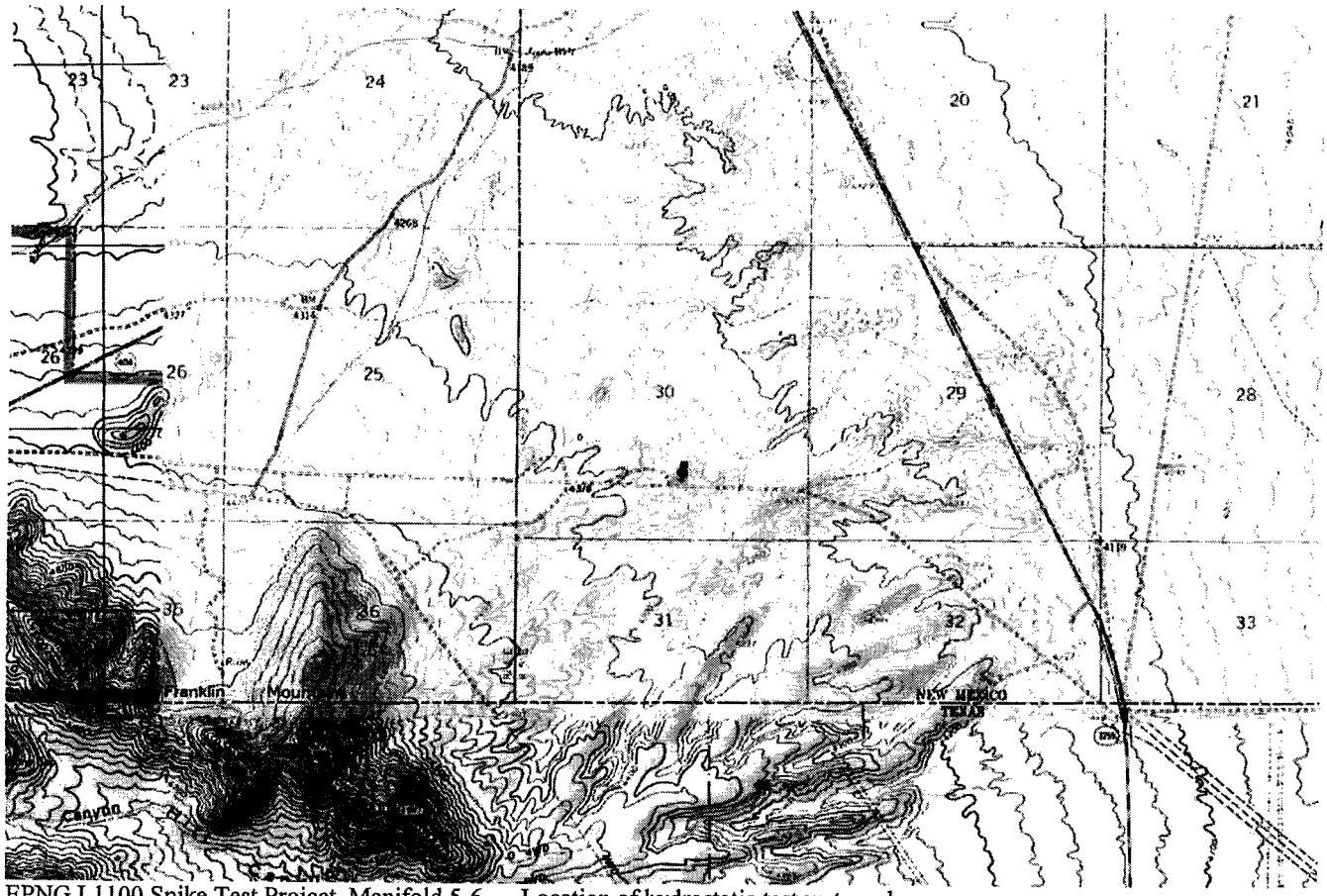
•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**
OCD Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3465
jim.griswold@state.nm.us



EPNG L1100 Spike Test Project_Manifold 5-6. Location of hydrostatic test water release.


EPNG L1100 Spike Test Project_Manifold 5-6. Location of hydrostatic test water release.

## Bratcher, Mike, EMNRD

**From:** Castellano, Sheila Fennell (Contractor) <Sheila_Castellano@KinderMorgan.com>
**Sent:** Monday, June 12, 2017 3:13 PM
**To:** Bratcher, Mike, EMNRD; Griswold, Jim, EMNRD
**Cc:** Castellano, Sheila Fennell (Contractor)
**Subject:** El Paso Natural Gas Company_Line No. 1100 Spike Test_C141 Release Notification_RELEASE No. 2
**Attachments:** NMOCD_Form C-141_Initial submittal_RELEASE #2.pdf

Attached is El Paso Natural Gas Company's (EPNG) submittal of Form C-141, as NMOCD's required initial Written Notification, for the unauthorized release of pipeline fluids in Dona Ana County, New Mexico. The event occurred during a hydrostatic pressure test of EPNG's existing 26-inch O.D. California Line (Line No. 1100) on May 25, 2017.

As mentioned in my verbal notification, this is a second release that occurred at the same location (Manifold 5-6) as the previous release which occurred on May 8, 2017. This release occurred as hydrostatic test water was being moved into a section for testing. No water left the right of way. All water was collected from the bell hole beneath the test manifold. The event occurred on land administered by the Bureau of Land Management.

Analysis reports from the soil and pipe fluid samples collected will be forwarded to you for review upon receipt.

Please feel free to contact me directly if you have any questions.

Thank you,
Sheila Castellano

KINDER MORGAN

Sheila Castellano - Contractor Consultant
2 North Nevada Ave
Colorado Springs, CO 80903
o: 719 520-3719
c: 719 352-1367