

NM OIL CONSERVATION
ARTESIA DISTRICT

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

NOV 24 2017

Form C-141
Revised April 3, 2017

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

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

FAB1733430549 **Release Notification and Corrective Action**
NAB1733430713 **OPERATOR** Initial Report Final Report

Name of Company El Paso Natural Gas Company, LLC a subsidiary of Kinder Morgan Inc. <i>TD4LO</i>	Contact Cesar Ochoa
Address 8645 Railroad Drive El Paso, Texas 79904	Telephone No. 915-587-3694
Facility Name EPNG's Line No. 1100	Facility Type 26-inch Outside Diameter (O.D.) steel natural gas pipeline

Surface Owner Private Land	Mineral Owner	API No.
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	19	23 S	19 W					Hidalgo

Latitude 32.2960268 Longitude -108.8314753 NAD83

NATURE OF RELEASE

Type of Release Hydrostatic test water from an existing natural gas pipeline	Volume of Release 35-48 +/- bbls	Volume Recovered Unknown
Source of Release Overflown frac tank	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? NMOCD- Carl J, Chaves	
By Whom? Cesar Ochoa	Date and Hour 11/16/2017 @ 1:47pm *2:29 per email	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

← according to immediate notification see email

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
After hydrostatic test was completed on sections 3 and 4 on 11/10/2017, EPNG started pushing water into section 5. EPNG was venting air through test section 6 utilizing a frac tank to receive air and small amounts of water. Operator left section 6 leaving the valve open. The frac tank located on Mile Post 355+ 3100 overflowed releasing into the environment approximately 1500 to 2000 gallons of hydrostatic test water. The release was discovered until 11/16/2017 @ 10:15 am.

Impacted soil samples were collected on 11/17/2017 and shipped to Xenco Laboratories in El Paso Texas. Samples will be analyzed for VOC's (method 8260), PCB's, TCLP BTEX, TPH (Method 8015) and NORMS.

Describe Area Affected and Cleanup Action Taken.*
Impacted soil was cast away and will be handled according to laboratory results.

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:	OIL CONSERVATION DIVISION	
Printed Name: Cesar Ochoa	Approved by Environmental Specialist:	
Title: EHS Engineer II	Approval Date: 11/28/17	Expiration Date: N/A
E-mail Address: cesar_ochoa@kindermorgan.com Date: 11/24/2017 Phone: 915-587-3694	Conditions of Approval: see attached	Attached <input checked="" type="checkbox"/> 299-4500

* Attach Additional Sheets If Necessary
11/27/17 AB

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **11/24/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4500 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 II office in Artesia on or before 12/24/17. 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; C₆ thru C₃₆), 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; C₆ thru C₃₆), 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

Weaver, Crystal, EMNRD

From: Ochoa Vidales, Cesar G <Cesar_Ochoa@kindermorgan.com>
Sent: Friday, November 24, 2017 3:23 PM
To: Weaver, Crystal, EMNRD; Chavez, Carl J, EMNRD
Cc: Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD; Blythe, Amy M (Amy)
Subject: RE: Hydrostatic Test Water Release Hidalgo Co. Reported at ~ 1:47 p.m. Today by Kinder Morgan (El Paso Natural Gas)
Attachments: C-141L100MP355.pdf

Dear Crystal,

Attached is El Paso Natural Gas Company's (EPNG) **Initial Report on Form C-141**, as NMOCD's required Written Notification, for the unauthorized release of hydrostatic test water in Hidalgo County, New Mexico. The event occurred during a hydrostatic project on the California Main Line (Line No. 1100) while moving water from test section 3 and 4 into test section 5 reported on November 16, 2017.

Respectfully,

Cesar G. Ochoa, P.E.
Pipeline Engineer- EHS
8645 Railroad Dr. El Paso, TX. 79904
Office (915) 587-3694, Cell (915) 345-6605, Fax (915) 587-3639



From: Weaver, Crystal, EMNRD [mailto:Crystal.Weaver@state.nm.us]
Sent: Thursday, November 16, 2017 4:39 PM
To: Ochoa Vidales, Cesar G; Chavez, Carl J, EMNRD
Cc: Billings, Bradford, EMNRD; Bratcher, Mike, EMNRD
Subject: RE: Hydrostatic Test Water Release Hidalgo Co. Reported at ~ 1:47 p.m. Today by Kinder Morgan (El Paso Natural Gas)

[This email message was received from the Internet and came from outside of Kinder Morgan]

Cesar,

Thank you for the notification and the information. Please follow this notification with the submission of an Initial C-141 form on or before 11/25/17. Also if any of the HST water made it onto Federal or State Land Office surface then Kinder Morgan/El Paso Natural Gas Co. will need to notify the proper contacts for those agencies if applicable.

If you have any questions or concerns you may contact either myself or Mike Bratcher here at the OCD District II Artesia Office.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Ochoa Vidales, Cesar G [mailto:Cesar_Ochoa@kindermorgan.com]

Sent: Thursday, November 16, 2017 2:29 PM

To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>

Cc: Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>

Subject: RE: Hydrostatic Test Water Release Hidalgo Co. Reported at ~ 1:47 p.m. Today by Kinder Morgan (El Paso Natural Gas)

Crystal/ Carl,

We actually believe the release occurred on 11/10 but it was discover by our personnel today at 10:15.

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[This email message was received from the Internet and came from outside of Kinder Morgan]

Crystal:

Mr. Cesar Ochoa called into OCD- SF today at ~ 1:47 p.m. to report a hydrostatic test water release approaching or exceeding 25 bbls at El Paso Natural Gas Line 1100 (Mile Post 355 + 3100) or at lat. 32.2960268 -108.8314753 (see attached photos).

On Friday, test water was removed from a section of pipe to another section. A vent was left open in the frack tank containing the HST water, and it overflowed during the weekend while no one was there or noticed/discovered until 11/10 at ~ 4 p.m.

Please contact Mr. Ochoa at (915) 587-3694 or via e-mail at cesar_ochoa@kindermorgan.com.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

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