

**2R - 423**

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**GENERAL  
CORRESPONDENCE**

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

## Chavez, Carl J, EMNRD

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**From:** Chavez, Carl J, EMNRD  
**Sent:** Wednesday, August 08, 2012 4:46 PM  
**To:** Joseph.Martinez@southwestgeoscience.com  
**Cc:** Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Dade, Randy, EMNRD; Bratcher, Mike, EMNRD  
**Subject:** RE: New Mexico Oil Conservation Division 2RPs- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has completed its review the cover letter dated April 25, 2012 and 2R-423 Trunk "A" Separator Corrective Action Report dated April 19, 2012.

OCD requires some additional work in order to adequately evaluate chlorides at the site and determine whether the site may be closed and/or issued a "No Further Action" as requested.

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

- 1) Close the landfarms and reuse the remediated landfarm soils.
- 2) Issue No Further Action (NFA) or close the corrective action.

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

- 1) EP collected one soil sample per soil boring (SB) from each of 6 SBs and no static water table was encountered and maps indicate the location is isolated and away from natural resource features.
- 2) EP excavated ~ 600 yds of contaminated soil and a polypropylene liner was installed on floor of excavation. 100 yds of treated soils were re-installed into excavation. EP later backfilled to grade with ~ 500 yds of imported soil.
- 3) OCD notices that EP is requesting closure of the small landfarms based on one vadose zone sample collected from a central location at the base of excavation, which met oil and gas regulations, i.e., 19.15.36 NMAC criteria.
- 4) There is currently about 475 yds of stockpiled soils on site for reuse.
- 5) 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 (5,000 ppm) based on the depth to static water level below ground.
- 6) OCD notices that the prescribed sample collection method for "small landfarm" was not completed; therefore, the cleanup standards under 19.15.36 NMAC have not yet been achieved.
- 7) OCD notices permeable lithology with depth throughout area.
- 8) EP removed berms around the landfarm and restored treatment cell to grade.
- 9) OCD notices that the source area contains petroleum hydrocarbons below the excavation depth (unspecified); however, the water table appears to be greater than 200 feet (NM Tech GIS) and the site is isolated.
- 10) B-1 within the excavation area met OCD cleanup standards from 99 – 100 feet bgl.
- 11) Landfarm TS samples and LC samples reveal exceedances to chloride. Others sampling conducted reveals chloride levels above 500 ppm as high as 3,300 ppm.

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

#### **A. Small Landfarm**

- 1) C-137EZ Forms for the small landfarm with supporting soils quality information that meets the criteria with the exception of chlorides and 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; TPH < 2,500 ppm; and Chlorides <

500 ppm. The operator may proceed with item 3 below and submittal of the form with information in order for the OCD to evaluate chlorides in the stockpiled landfarm treated soils.

- 2) About 500 yds of treated soils remain within the landfarm treatment cell. About 25 yds of this near LC-11 was contaminated and removed for disposition at the Lea Landfill in Eddy County. Currently, about 475 yds of treated soils from the small landfarm are stockpiled at the SW portion of the site and proposed for on and off-site beneficial reuse.
- 3) OCD requires a work plan for composite resampling of stockpiled soils mentioned above for chlorides to determine final disposition of the stockpiled soils. Depending on the concentrations; isolation; and depth to static water level; and background soils sampling, a risk-based chloride level may be proposed by the operator for reuse.
- 4) Landfarm closure is based on one "VS-1" soil sample collected in the center of the landfarm confirming levels below "Small Landfarm" standards including chlorides.

#### **B. Vadose Zone Trunk "A" Separator Excavation**

- 1) OCD spill cleanup criteria is: 10 ppm Benzene; 50 ppm BTEX; and 5,000 ppm TPH; and sampling is within or marginally above these limits. Chlorides were not analyzed in the soil borings.
- 2) OCD will defer the request for an additional soil boring within the excavated area at depth to an evaluation of the landfarm sampling for chlorides in item 3 above.
- 3) EP closure of the corrective action will leave residual hydrocarbons in place below the polypropylene liner placed at the base of the excavation.
- 4) EP collected one soil sample (with exception of B-1) per each soil boring (SB) drilled ~ 100 feet deep with an unspecified depth from each of 6 SBs.
- 5) The "B-1" soil sample location (56 – 57 feet bgl) detected hydrocarbons in the source area with depth, and a polypropylene liner was installed at the base of excavation (depth not specified) in order to prevent further leaching of hydrocarbons below the source area.
- 6) The excavation was backfilled without requesting OCD approval and the depth and dimensions of the excavation was not specified. Please provide this information with a diagram(s).

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/>

"Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?" To see how, please go to: "Pollution Prevention & Waste Minimization" at <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

## Chavez, Carl J, EMNRD

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**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  
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  
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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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8829 Tradeway Street | San Antonio, Texas 78217  
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Thanks,  
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## Chavez, Carl J, EMNRD

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Carl J. Chavez, CHMM  
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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")

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**From:** Gregg, Russell [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:** Gregg, Russell [RDGREGG@eprod.com]  
**Sent:** Wednesday, August 04, 2010 1:53 PM  
**To:** Chavez, Carl J, EMNRD  
**Subject:** RE:Trunk A Separator Facility Corrective Actions

Carl,

Let this serve as our notification to begin work per the approved Work Plan for the Trunk A Separator in Carlsbad, New Mexico. Work will begin Monday August 9 and should be completed Friday August 13. Our plan for next week is to install six soil borings to 100 feet and collect soil samples. If you have any questions or comments feel free to contact me at anytime.

Thanks,

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

---

**From:** Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]  
**Sent:** Tuesday, July 13, 2010 8:01 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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## Chavez, Carl J, EMNRD

---

**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  
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Website: <http://www.emnrd.state.nm.us/oed/index.htm>  
(Pollution Prevention Guidance is under "Publications")

## Chavez, Carl J, EMNRD

---

**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)

---

**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.

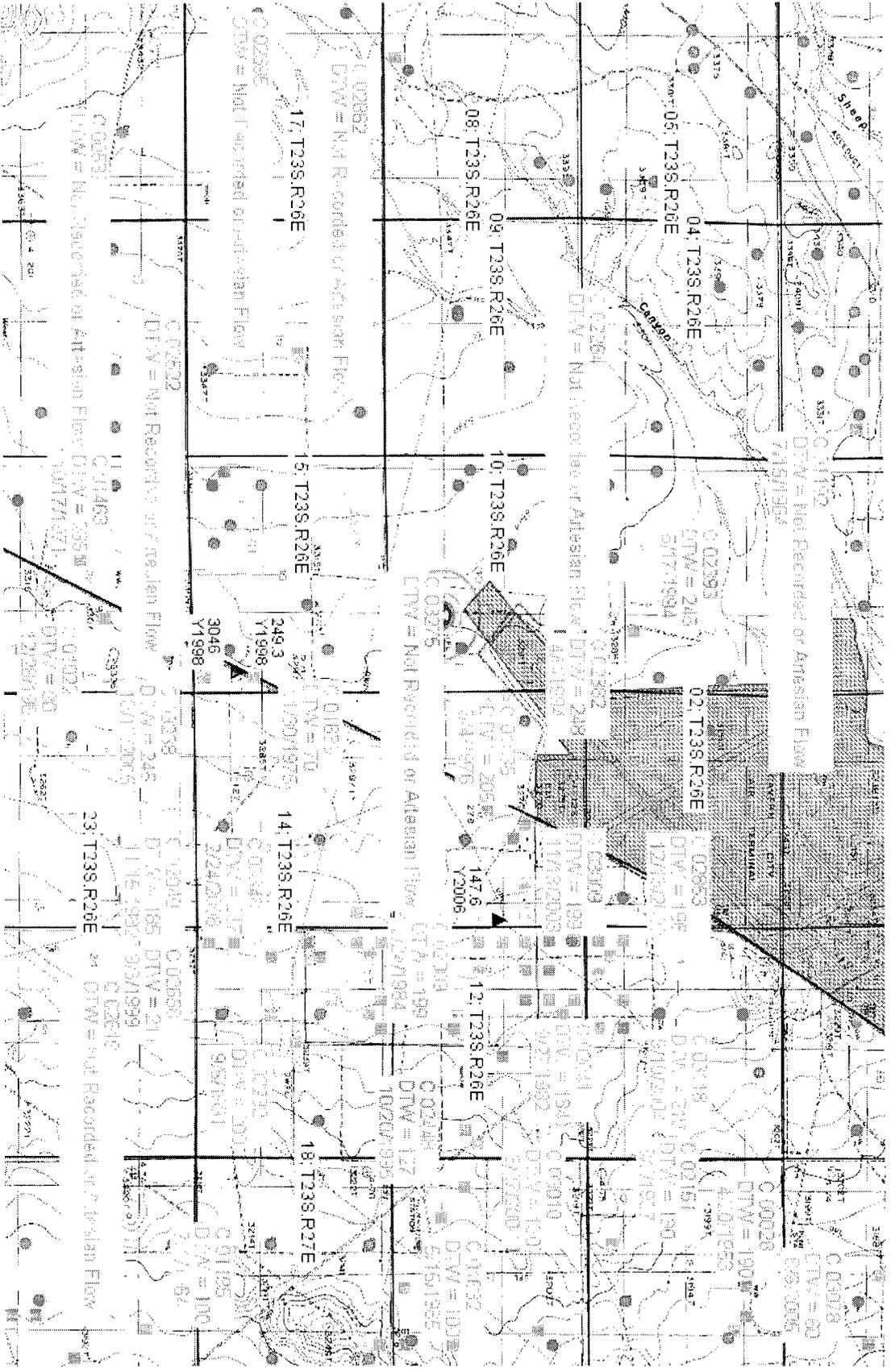
*Please be advised that NMOCD approval of this plan does not relieve Enterprise Products of responsibility should their operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Enterprise Products of responsibility for compliance 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)  
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(Pollution Prevention Guidance is under "Publications")

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Petroleum Recovery Research Center	Trunk A Separator	Figure: 1
	New Mexico Oil Conservation Division	Jun 23, 2010