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Closure Report
Energy Transfer Partners: California B
[2RP-2779]

March 25, 2016

Prepared By:

TALON/LPE
408 W. Texas Avenue
Artesia, New Mexico 88210

Prepared For:

Energy Transfer Partners

Mr. Randy Pair
BUREAU OF LAND MANAGEMENT
620 E. Green Street
Carlsbad, NM 88220

Subject: **Soil Assessment and Remediation Work Plan**
Energy Transfer Partners
California B Release

Dear Mr. Pair,

Energy Transfer Partners (Energy Transfer) has contracted Talon/LPE (Talon) to perform soil assessment and remediation services at the above referenced location. The incident description, soil sampling results, remediation activities and closure request are submitted herein.

Site Information

The Energy Transfer California B Release is located approximately thirty-four (34) miles south of Carlsbad, New Mexico. The legal location for this site is Unit Letter D, Section 9, Township 26 South and Range 29 East in Eddy County New Mexico. More specifically the latitude and longitude for this release are 32.064283 North and -103.99685 West. A site plan is presented in [Appendix I](#).

According to the soil survey provided by the United States Department of Agriculture Natural Resources Conservation Service, the soil in this area is made up of the Pajarito-Dune land complex with 0 to 3 percent slopes. Drainage courses in this area are normally dry.

Ground Water and Site Ranking

According to the New Mexico Office of the State Engineer the ground water in this area is approximately 75-feet below ground surface (BGS). The referenced ground water data is presented in [Appendix II](#). Therefore the ranking for this site is a **10** based on the following:

Depth to ground water	>50'
Wellhead Protection Area	>1000'
Distance to surface water body	>1000'

Based upon the site ranking of **10**, NMOCD Recommended Remedial Action Levels (RRAL) are 50 mg/kg for BTEX, 10 mg/kg for Benzene, 1,000 mg/kg for TPH and 1,000 mg/kg for total chlorides.

Incident Description and Initial Remedial Actions

The California B Pipeline ruptured due to internal corrosion. The rupture resulted in a release of approximately 12bbls of produced water. A vacuum truck was utilized to recover approximately 10bbls of produced water. Talon mobilized personnel to conduct a site assessment and soil sampling activities within the impacted area. Analytical results from the soil sampling activities are summarized in the table below. Due to the presence of the below grade pipelines vertical delineation of the TPH impacts was not possible during the initial sampling event.

Laboratory Results

See [Appendix IV](#) for complete report of laboratory results.

Initial Sampling Results (See Work Plan)

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0	41.3	503	2380	36800
S-2	0	8.48	29.7	272	809
S-3	0	8.72	58.1	973	11900
S-4	0	9.99	151	2050	32600
S-5	0	8.14	ND	1090	4780

Confirmation Sampling Results

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	0.5	ND	--	ND	54.5
S-2	0.5	ND	--	ND	340
BOTTOM		ND	14.5	ND	ND
N-WALL		ND	169	18.5	ND
E-WALL		ND	--	ND	ND
S-WALL		10.1	146	44	ND
W-WALL		18.4	107	1070	26.2

(--) Analyte Not Tested

(ND) Analyte Not Detected

Conclusions and Remedial Actions Taken

- The impacted soil surrounding the pipelines was excavated using chloride titrations and PID readings to guide the extent of the excavation.
- Once field results indicated that the remaining soil was below NMOCD RRAL's for TPH, BTEX and Chlorides, confirmation soil samples were taken to insure the field results were valid.
- Upon receipt of analytical results from the confirmation sampling permission was granted to backfill the excavation by NMOCD on December 22, 2015 and by BLM on December 23, 2015.
- The excavation was backfilled and contoured to match the surrounding terrain.

Closure

On behalf of Energy Transfer Partners we respectfully request that no further actions be required and that closure with regard to this release be granted.

If we can provide additional information or be of further assistance, please contact our office at (575)-746-8768.

Respectfully submitted,

TALON/LPE


Sheldon Hitchcock
Project Manager

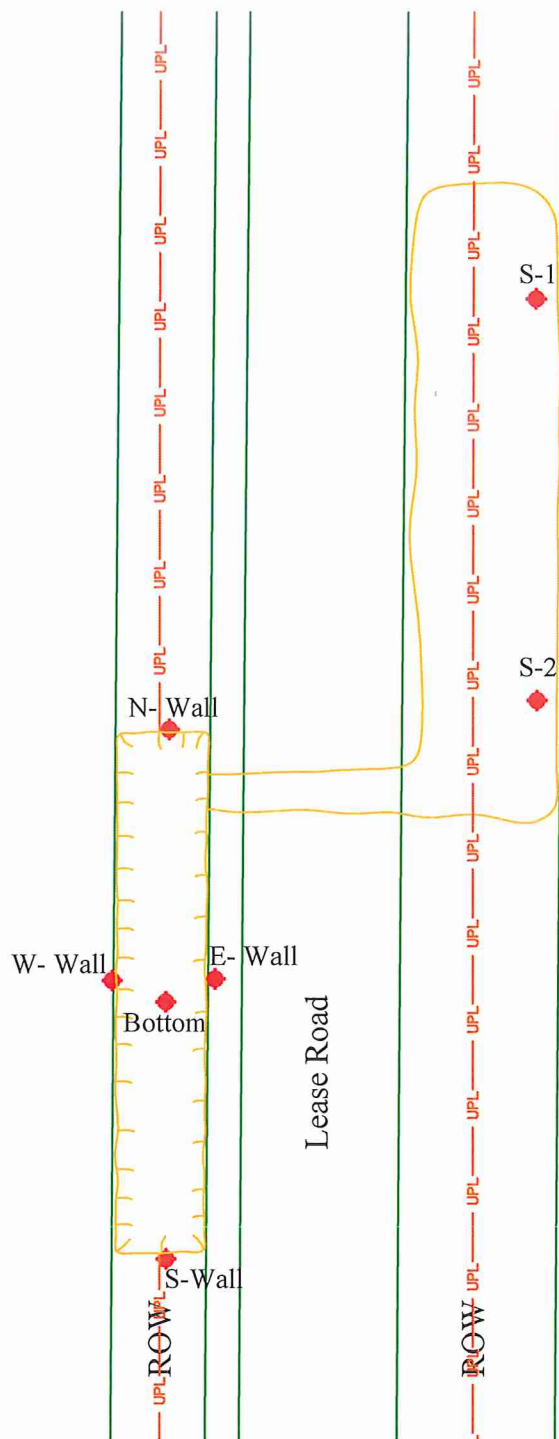

David J. Adkins
District Manager

Attachments

Appendix I Site Plan
Appendix II Groundwater Data
Appendix III Initial & Final C-141
Appendix IV Laboratory Results

APPENDIX I

SITE PLAN



0 15 30
Scale in Feet

Legend	
◆	- Sample Location
—	- Impacted Area
- - -	- Underground Pipeline



Date: 11/17/2015

Scale: 1" = 30'

Drawn By: TJS

Cal B
Southern Union Gas Services
Eddy County, New Mexico
Figure 1 - Site Plan

APPENDIX II

GROUNDWATER DATA



New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the
POD suffix indicates the
POD has been replaced
& no longer serves a
water right file.)

(R=POD has
been replaced,
O=orphaned,
C=the file is
closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub- Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
C 03507 POD1	C	ED		1	3	3	05	26S	29E	593064	3548313	1445	140	78	62
C 03508 POD1	C	ED		1	3	3	05	26S	29E	593063	3548361	1464	140	75	65

Average Depth to Water: 76 feet

Minimum Depth: 75 feet

Maximum Depth: 78 feet

Record Count: 2

Basin/County Search:

County: Eddy

UTMNAD83 Radius Search (in meters):

Easting (X): 594416

Northing (Y): 3547801

Radius: 1500

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

APPENDIX III
INITIAL C-141
&
FINAL C-141

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.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Regency Gas Partners	Contact	Rachel Johnson
Address	PO Box 1467 McCamey, TX 79752	Telephone No.	325-514-2636
Facility Name	Cal B	Facility Type	Pipeline
Surface Owner	NMBLM	Mineral Owner	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	23	26S	29E					Eddy

Latitude 32.064147 Longitude 103.995385

NATURE OF RELEASE

Type of Release	Produced Water	Volume of Release	12bbls	Volume Recovered	10bbls
Source of Release	16" steel pipeline	Date and Hour of Occurrence	unknown	Date and Hour of Discovery	1/11/15 2:30pm
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Voicemail to Tomas Oberding		
By Whom?	Rachel Johnson	Date and Hour	1/12/15 4:00pm		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.*

DTW 145'

Describe Cause of Problem and Remedial Action Taken.*

On January 11, 2015 an operator with Regency Gas discovered a pipeline release in Eddy County. A 16" steel line leaked caused by pipeline corrosion. Following the discovery of the release the line was shut in. Due to the line being in a road the line was covered and soil not remediated at this time.

Describe Area Affected and Cleanup Action Taken.*

The release affected the pipeline road measuring approximately 110' length x 75' in width. Once the line is cut and capped, and removed from the right-of-way, Talon of Midland will remediate.

Contaminated soil will be removed from site and replaced with clean backfill. The release will be remediated in accordance with NMOCD Regulatory Guidelines.

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.

OIL CONSERVATION DIVISION

Signature:	Approved by Environmental Specialist:		
Printed Name: Rachel Johnson			
Title: Environmental Specialist	Approval Date:	Expiration Date:	
E-mail Address: rachel.johnson@regencygas.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date:	Phone:		

* Attach Additional Sheets If Necessary

District I
1625 N. French Dr., Hobbs, NM 88240
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Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
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Form C-141
Revised August 8, 2011

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: Energy Transfer Partners	Contact: Johnnie Bradford
Address: 600 N. Marienfeld St. Ste. 700 Midland, TX 79701	Telephone No. 817-302-9812
Facility Name: California B Pipeline	Facility Type: Pipeline
Surface Owner: BLM	Mineral Owner:
API No.	

LOCATION OF RELEASE

Unit Letter D	Section 9	Township 26S	Range 29E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude 32.06428 Longitude -103.99685

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 12bbls	Volume Recovered: 10bbls
Source of Release: 16" pipeline leak	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: 1/11/2015 2:30pm MST
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Voicemail NMOCD	
By Whom? Rachel Johnson	Date and Hour: 1/12/15 4:00 pm MST	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

A 16" steel line leaked due to corrosion. Following discovery of the release the line was shut in and repaired.

Describe Area Affected and Cleanup Action Taken.*

Talon/LPE (Talon) mobilized personnel to conduct a site assessment and begin remediation of the impacted area. Upon approval of a remediation work plan by BLM and NMOCD, Talon began excavating the impacted soil using PID readings and chloride titrations to guide the excavation. Once field readings indicated that all of the impacted material above NMOCD RRAL's was removed confirmation soil samples were obtained. After review of the laboratory data from the confirmation sampling, NMOCD and BLM approved backfill of the site. The site was backfilled and contoured to match the surrounding location.

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.

OIL CONSERVATION DIVISION

Signature: <i>Johnnie Bradford</i>	Approved by Environmental Specialist:	
Printed Name: Johnnie Bradford		
Title: Sr. Environmental Specialist	Approval Date:	Expiration Date:
E-mail Address: johnnie.bradford@energytransfer.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 3/24/2016 <i>05/29/2016</i> Phone: 817-302-9812		

* Attach Additional Sheets If Necessary