

Hamlet, Robert, EMNRD

From: Hamlet, Robert, EMNRD
Sent: Wednesday, February 27, 2019 11:05 AM
To: 'Joel Lowry'
Cc: Bratcher, Mike, EMNRD; Venegas, Victoria, EMNRD; Ericson, Dean
Subject: ETC - Avalon Compressor Station (2RP-4848) 7-5-2018
Attachments: Signed - 2RP-4848.pdf

Joel,

We have received your remediation plan for 2RP-4848 Avalon Compressor Station, thank you. This remediation plan is approved.

Please let me know if you have any further questions.

Regards,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@state.nm.us

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.

From: Joel Lowry <joel@lowryenvironmental.com>
Sent: Tuesday, February 26, 2019 7:47 AM
To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>
Cc: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>; Ericson, Dean <Dean.Ericson@energyTransfer.com>
Subject: [EXT] RE: ETC's Avalon Compressor Station - (2) Releases - 2RP-4657 and 2RP-4848

Mr. Hamlet,

Please find attached the applicable pages from the C-141s to append to the above referenced projects. If you have any questions, need any additional information or notice anything that might need changing, please feel free to contact me by phone or email. Thanks.

Respectfully,

Joel Lowry

Environmental Professional



PO Box 896
Lovington, NM 88260
Direct 432-466-4450

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From: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>

Sent: Thursday, February 21, 2019 3:39 PM

To: Joel Lowry <joel@lowryenvironmental.com>

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

Subject: RE: ETC's Avalon Compressor Station - (2) Releases - 2RP-4657 and 2RP-4848

Hey Joel,

Please fill out the attached portion of the Form C-141 for both remediation plans. These pages will need to be sent in with Characterization and/or Remediation proposals. Anytime we receive a Characterization and/or Remediation Plan, we will need pages 3,4, and 5 of the C-141 in with that plan

Please let me know if you have any questions.

Thank you,

Robert J Hamlet
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 840-5963
Robert.Hamlet@state.nm.us

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addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Joel Lowry <joel@lowryenvironmental.com>

Sent: Thursday, February 21, 2019 7:27 AM

To: Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; rmann@slo.state.nm.us; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Cc: Ericson, Dean <Dean.Ericson@energyTransfer.com>

Subject: [EXT] ETC's Avalon Compressor Station - (2) Releases - 2RP-4657 and 2RP-4848

Mr. Hamlet,

I apologize for the late response, I was stuck in the field yesterday. Let me start by apologizing for any confusion. Now that I am back in the office it has taken me a moment to get my head wrapped around everything. On further review it appears that there have been two reportable release at that facility that are in need of remediation; 2RP-4657 and 2RP-4848. 2RP-4657 occurred in March of 2018. 2RP-4848 occurred in July of 2018 and is approximately 150 ft north of 2RP-4657. The Remediation Work Plans for each of the releases are attached. Also attached is the revised soil chemistry table that has been prepared for 2RP-4657.

2RP-4657 – ETC's Avalon Compressor Station – March 2018

During initial soil investigations conducted on 8/30/2018 and 9/5/2018, thirteen (13) delineation soil samples were collected and field screened for chloride and hydrocarbon contamination. Select soil samples were submitted to the laboratory for confirmation analysis of BTEX, TPH and Chloride. Laboratory analytical results indicated two (2) soil samples TP-1 @ 2' and TP-5 @ 2' exhibited BTEX and/or TPH concentrations above the NMOCD Closure Criteria. Laboratory analytical results from delineation soil samples indicated soil was not affected above the NMOCD Closure Criteria beyond 4 ft. bgs at either location.

ETC has proposed to excavate impacted soil affected above the NMOCD Closure Criteria in the areas characterized by samples points TP-1 and TP-5. Upon excavating impacted soil within the affected area, confirmation soil samples will be collected from the floor and sidewalls of the excavated area(s) and submitted to the laboratory for analysis of BTEX, TPH and chloride. I have attached a revised chemistry table that reflects the corrected BTEX data.

2RP-4848 - ETC's Avalon Compressor Station – July 2018

During initial soil investigations conducted on 7/6/2018, 7/10/2018, 7/12/2018 and 7/20/2018, twenty-three (23) delineation soil samples were collected and field screened for chloride and/or hydrocarbon contamination. Select soil samples were submitted to the laboratory for confirmation analysis of BTEX, TPH and Chloride. Laboratory analytical results indicated seven (7) soil samples (TP-2 @ 8', V1 @ 6", V2 @ 6", V3 @ 6", V4 @ 6', H1 @ 4" and H2 @ 4") exhibited BTEX, TPH and/or chloride concentrations above the NMOCD Closure Criteria. Laboratory analytical results from delineation soil samples indicated depths of impact above the NMOCD Closure Criteria range from less than 2 ft to 12 ft bgs.

ETC has proposed to excavate impacted soil affected above the NMOCD Closure Criteria in the areas characterized by samples points TP-2 @ 8', V1 @ 6", V2 @ 6", V3 @ 6", V4 @ 6', H1 @ 4" and H2 @ 4" depths ranging from 1 to 10 ft. bgs. Upon excavating impacted soil within the affected area, confirmation soil samples will be collected from the floor

and sidewalls of the excavated area(s) and submitted to the laboratory for analysis of BTEX, TPH and chloride. Upon receiving laboratory analytical results from confirmation soil samples, the excavation will be advanced as necessary. Complete advancement of the excavation adjacent to and beneath the produced water lines in the central portion of the release site and toward the east may be precluded due to the presence of active high-pressure lines and/or above-ground storage tanks. In the event impacted soil affected above the NMOCD Closure Criteria is discovered adjacent to the produced water tanks and/or above-ground storage tanks, a deferral request may be sought. (Those impacts will be documented on a scaled site map)

It is anticipated that respective excavations will measure 2,500 and 4,200 sq. ft. With your permission, ETCs is requesting a modified sampling plan in which excavation confirmation soil samples representative of every 500 sq. ft. are collected as opposed to every 200 sq. ft.

Respectfully,

Joel Lowry

Environmental Professional



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Lovington, NM 88260
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