

**From:** [Billings, Bradford, EMNRD](#)  
**To:** [Yu, Olivia, EMNRD](#)  
**Subject:** FW: NFA GW-010  
**Date:** Friday, March 2, 2018 12:03:04 PM  
**Attachments:** image001.png

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**From:** Boultinghouse, Stacy [mailto:Stacy.Boultinghouse@energytransfer.com]  
**Sent:** Tuesday, February 27, 2018 9:28 AM  
**To:** Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>; Slade, Rose <Rose.Slade@energytransfer.com>  
**Subject:** RE: NFA GW-010

Thanks, Brad!

"of all the paths you take in life,  
make sure a few of them are dirt"



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**Stacy Boultinghouse, PG**(TX4889/LA73)

EH&S Environmental-Manager  
Emergency Response/Waste/Remediation  
Energy Transfer Partners

**O:** 210.870.2725

**C:** 281.740.0494

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This email may contain confidential attorney-client privileged information or attorney work product. If you received this email in error, please contact me at one of the above phone numbers.

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**From:** Billings, Bradford, EMNRD [mailto:Bradford.Billings@state.nm.us]  
**Sent:** Tuesday, February 27, 2018 10:27 AM  
**To:** Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>; Slade, Rose <Rose.Slade@energytransfer.com>  
**Subject:** NFA GW-010

February 27, 2018

Stacy Boultinghouse  
Energy Transfer

RE: Closure/No Further Action Request for NMOCD Ref: GW-010

Upon review of reports, permits and supplied information and data, and after review of supplied report requesting closure the following:

The West Boiler Sump, in Leas County, located in Unit L, sec.33, T24S, R37E, at Lat. 32.17374, -103.17375.  
No further Action is approved. Closure of the action under GW-010 permit is allowed.

Please retain this electronic communication for your records, as NO official paper copy will be sent.

Thank you for your time and effort regarding this matter.

Sincerely,  
Bradford Billings  
EMNRD/OCD – Santa Fe

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 ground water, 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, local laws and/or regulations

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**From:** [Billings, Bradford, EMNRD](#)  
**To:** [Yu, Olivia, EMNRD](#)  
**Subject:** FW: West Boiler Tank GW-010  
**Date:** Tuesday, February 27, 2018 10:51:47 AM  
**Attachments:** RE\_ Jal West Boiler Sump Approval .pdf  
Hydo Jal 3 .pdf  
GW-010 - Jal #3 Gas Plant West Boiler Sump - Field Activities Summary an....pdf  
ETCs Jal #3 West Boiler Sump - Proposed Closure Strategy\_v1.pdf  
Final C-144 Jal 3 West Boiler Sumpl.pdf

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**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

**Sent:** Friday, February 23, 2018 12:12 PM

**To:** Billings, Bradford, EMNRD

**Subject:** RE: West Boiler Tank GW-010

Please find attached all the information as requested for the "Request for Closure" for the ETC Jal #3 Gas Plant West Boiler Sump. I am also providing you with a brief summary of field activities to further assist you with a timeline of events that took place on this project.

The "West Boiler Sump" is a 160 bbl. fiberglass tank, utilized to contain waste water from the fresh water system and steam boiler buildings.

May 2017 – The last remaining piping was re-routed to the newly installed above grade horizontal overflow tank and the West Boiler Sump was removed from service. Liquids remaining within the West Boiler Sump were removed with a vacuum truck and disposed of at an NMOCD-permitted disposal well. Upon removing any remaining liquids, the BGT was cleaned utilizing a steamer.

July 26, 2016 – The "Proposed Closure Strategy Report" was submitted to the New Mexico Energy, Mineral, and Nature Resources Department, New Mexico Oil Conservation Division. (Report attached)

August 16, 2017 – The "Proposed Closure Strategy Report" was approved by the Oil Conservation Division, Hydrologist, Adv-District 1 Office. (Approval email attached)

September 18<sup>th</sup> – 22<sup>nd</sup> – The first hydrostatic test was conducted on the BGT. During the hydrostatic test, the tank was filled with fresh water to its lowest gravity drain inlet and monitored daily for changes in the water level. During the hydrostatic test, no notable decrease in water level was observed. (No records)

November 14<sup>th</sup> -15<sup>th</sup> 2017– Another hydrostatic test was conducted on the BGT due to the amount of rain events that had taken place and some rainwater was in the below ground sump. I wanted to verify again that now leakage had occurred. During this hydrostatic test, the tank was once again filled with fresh water to its lowest gravity drain inlet and monitored for changes in water levels. (Operations / Contractors statement attached)

November 15, 2017 – Representatives and contractors of ETC, conducted a visual inspection of the West Boiler Sump in an effort to determine if evidence of a release was present. The visual inspection included checking the floor, sides, seams, and inlets for evidence of potential failures. During the visual inspection, the fiberglass tank appeared to be intact and no evidence of release were noted. (Photo IMG-1290 attached of visual inside the tank)

January 23<sup>rd</sup> – 26<sup>th</sup> 2018 – Representative and contractors of ETC, began the process of cutting the top of the below grade sump at four (4) ft. bgs, the tanks were backfilled to four (4) ft. bgs, with locally sourced, non-impacted material. Upon backfilling the affected area, a 20-millimeter polyurethane liner was installed over the below ground sump location, during the installation of the liner, and approximate six (6) inch layer of pad sand was installed above and below the liner in an

effort to maintain its integrity during backfill activities. The final soil cover consisted of clean purchased backfill material, and upon backfilling and compacting the affected area, a permanent steel-marker was placed to document the location of the BGS. (Photos attached)  
(Final C-144 attached)

February 23, 2018 – ETC Field Services, LLC submitted the “*Field Activities Summary and Below-Grade Tank Closure Request*” to the New Mexico Energy, Minerals, and Natural Resources Department, Oil Conservation Division. (Pending approval)

ETC Field Services, LLC, hereby request approval of the final closure for the ETC Jal #3 Gas Plant West Boiler Sump.

If you have any questions or need any additional information, please let me know.

Thank you so much for your patience and your assistance.

Respectfully,

Rose Slade

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**From:** Billings, Bradford, EMNRD [<mailto:Bradford.Billings@state.nm.us>]

**Sent:** Friday, February 23, 2018 11:12 AM

**To:** Slade, Rose <[Rose.Slade@energytransfer.com](mailto:Rose.Slade@energytransfer.com)>

**Subject:** RE: West Boiler Tank GW-010

Just the West boiler. Have sufficient for the others.

Brad

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**From:** Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]

**Sent:** Friday, February 23, 2018 10:02 AM

**To:** Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>

**Subject:** RE: West Boiler Tank GW-010

No problem sir. I can send you that information, just to make sure I'm understanding you correctly, you need just the data for the West Boiler Sump correct? Or do you need all the data for both the Classifiers and the West Boiler Sump?

Rose

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**From:** Billings, Bradford, EMNRD [<mailto:Bradford.Billings@state.nm.us>]

**Sent:** Friday, February 23, 2018 10:33 AM

**To:** Slade, Rose <[Rose.Slade@energytransfer.com](mailto:Rose.Slade@energytransfer.com)>

**Subject:** West Boiler Tank

So going through the following

Will ship out on North and South classifier Tanks, and the GW-10.

I don't seem to have supporting documentation, ala the classifier tanks (reports, closure-wise, photos, Forms etc.) for the West Boiler Tank. The West Boiler was included in email from Stacy on the others, but didn't see it for West Boiler.

Can you provide?

Thanks

Brad

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**From:** Billings, Bradford, EMNRD  
**To:** Yu, Olivia, EMNRD  
**Subject:** FW: ETC Field Services (West Boiler Sump) GW-010  
**Date:** Tuesday, February 27, 2018 10:52:20 AM  
**Attachments:** image006.png  
image006.png  
GW-010 - Jal #3 Gas Plant West Boiler Sump - Field Activities Summary an...pdf  
Hyds-Jal 3.pdf

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**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]  
**Sent:** Wednesday, February 14, 2018 12:23 PM

**To:** Billings, Bradford, EMNRD  
**Cc:** Lowry, Joel  
**Subject:** ETC Field Services (West Boiler Sump) GW-010

Good day Mr. Billings,

Thank you for assisting us in trying to get closure on this project out at our ETC Jal #3 Gas Plant. I just wanted to make a correction to Stacy's email below, the GW# associated with this project is GW-010 not GW-101 as she put in her email below. I am also including the Jal #3 Gas Plant West Boiler Sump Field Activities Summary and BGT Closure Request with the final C-144 (located at the back of the report) and the verification statement from our operations supervisor and contractors that witnessed the "hydro-testing" of the BGS with photos of what the area looks like now with the permanent steel marker showing the location of the BGS as stated in our request for closure report.

If you have any questions, concerns, or require any additional information sir, please let Joel or myself know and we can provide anything else you may need.

Again, thank you for everything, and I hope you have a great day.

Respectfully,

Rose Slade



**Rose L. Slade**  
Senior Environmental Specialist,  
EHS Department  
Energy Transfer Partners  
O: 210.403.6525  
C: 432.940.5147

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**From:** Boultinghouse, Stacy

**Sent:** Friday, February 9, 2018 2:44 PM

**To:** Brad Billings [mailto:bradford.billings@state.nm.us] <bradford.billings@state.nm.us>

**Cc:** Slade, Rose <Rose.Slade@energytransfer.com>

**Subject:** FW: ETC Field Services (West Boiler Sump) GW-010

Good afternoon, Brad,

As noted in various email correspondence and meetings, ETC has fulfilled our obligation set forth by [6W-101](#) which included the removal/closure of legacy Below Ground Tanks (BGTs) as prescribed in documentation dating as far back as 2011.

Recently, ETC has completed all closure activities with regard to the BGTs referred to as the "Classifier Tanks" and "West Boiler Tank".

In accordance with the NMOCD, the tops of the two Classifier Tanks as well as the West Boiler Tank were cut to approximately four (4) feet bgs, backfilled with soil, a 20 mil polyurethane liner installed, and final backfill to grade completed.

As required the Final C-144 and Closure Reports detailing field activities and laboratory analytical results from confirmation soil samples have been filed.

As per our telecom, ETC hereby requests approval of final closure of the Final C-144s for both the Classifier Tanks and the Best Boiler Tank. In addition, ETC requests no further action be required for [6W-101](#).

Thank you.

"of all the paths you take in life,  
make sure a few of them are dirt"



**Stacy Boultinghouse, PG(1X4889/LA73)**  
EH&S Environmental-Manager  
Waste, Water, Remediation  
Energy Transfer Partners  
O: 210.870.2725  
C: 281.740.0494

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**From:** Slade, Rose

**Sent:** Friday, February 9, 2018 11:19 AM

**To:** Boultinghouse, Stacy <Stacy.Boultinghouse@energytransfer.com>

**Subject:** FW: ETC Field Services (West Boiler Sump) GW-010

**From:** Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Friday, February 9, 2018 10:49 AM

**To:** Slade, Rose <Rose.Slade@energytransfer.com>

**Cc:** Lowry, Joel <Lowry@trcsolutions.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

**Subject:** RE: ETC Field Services (West Boiler Sump) GW-010

Ms. Slade:

I do not know. Since Mr. Billings is on the email change and he is a hydrologist in NMOCD - Santa Fe, I will defer to him to address the below concerns.

Olivia

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**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

**Sent:** Friday, February 9, 2018 9:27 AM

**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

**Cc:** Lowry, Joel <Lowry@trcsolutions.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

**Subject:** RE: ETC Field Services (West Boiler Sump) GW-010

Ms. Yu,

Please correct me if I'm wrong, I didn't think we (ETC) were required to obtain a permit for hydrostatic testing on the BGS at the ETC Jal #3 Gas Plant. The hydrostatic test was not conducted on a pipeline it was on a below ground sump that was not utilized for storage of hydrocarbons, it was only used for containing waste water from the fresh water system and the steam boiler buildings. The hydrostatic test was a visual inspection that consisted of filling the BGS with clean fresh water and monitoring it daily to see if the water levels had diminished or not. We ETC and a Representative from TRC also conducted the internal inspection of the BGS by entering the BGS after all the fresh water had been removed and properly disposed of. The BGS was thoroughly inspected for evidence of any holes and/or evidence for failure of the floor and sidewalls of the BGS. There were none that were discovered during our internal inspection and the hydrostatic test was a success as well. We do not have any data of the hydrostatic test other than the dates in which our plant personnel monitored the test, and I can provide you with that data if you'd like? We do however have photos of our internal inspection and I have attached those for reference.

Again, this was a fiberglass, 160 bbl. tank, utilized to contain waste water from the fresh water system and steam boiler buildings. There were no indications of any holes, and/or failures of the BGS of any kind on the bottom floor or sidewalls. The hydrostatic test was monitored by company representatives and contractors, and the water used to conduct the hydro-testing was not discharge on any part of the land surface, it was vacuumed out and properly disposed of at an NMOCD approved facility. ETC is requesting NMOCD approval for closure of the West Boiler Sump GW-010.

Respectfully,

Rose Slade

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**From:** Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]

**Sent:** Friday, February 9, 2018 8:30 AM

**To:** Slade, Rose <Rose.Slade@energytransfer.com>

**Cc:** Lowry, Joel <Lowry@trcsolutions.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

**Subject:** RE: ETC Field Services (West Boiler Sump) GW-010

Good morning Ms. Slade:

Thank you for your prompt response and information. I see that the hydrostatic test folded within the proposed strategy was approved; however, a permit for conducting the hydrostatic test may still have been necessary. I will enquire on your behalf for reference. Nonetheless, as the testing has already been completed, please provide the data of the results.

Thanks,

Olivia

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**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]

**Sent:** Friday, February 9, 2018 7:17 AM

**To:** Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>

**Cc:** Lowry, Joel <Lowry@trcsolutions.com>; Billings, Bradford, EMNRD <Bradford.Billings@state.nm.us>

**Subject:** RE: ETC Field Services (West Boiler Sump) GW-010

Good morning Ms. Yu,

Mr. Gie Von Goten wanted SUGS (Southern Union Gas Services) to use the Discharge Plan #GW-101 from the very beginning in 2011. Then Dr. Oberding came in and asked us to continue to use the Discharge Plan GW-010 for all the remaining projects for this facility, we have always just used the Discharge Plan # as you will note from the photo below.

As far as the "hydrostatic test" that was part of the Proposed Closure Strategy Report that was submitted to Dr. Oberding and approved on August 16, 2017 (document attached)

Please let me know if you have any additional questions.

Have a great day!

Rose Slade

Alberto A. Gutiérrez

March 24, 2011

Mr. Glenn von Gonten  
Environmental Bureau Chief  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

RECEIVED OGD  
2011 MAR 25 A 10:15  
VIA EMAIL AND FIRST CLASS MAIL

RE: PROPOSED RETROFITTING AND CLOSURE OF SUBGRADE TANKS AT SOUTHERN UNION GAS SERVICES JAL #3 GAS PLANT (SECTION 33, TOWNSHIP 24 SOUTH, RANGE 37 EAST – NMOCD PERMIT GW010)

**From:** Yu, Olivia, EMNRD [<mailto:Olivia.Yu@state.nm.us>]  
**Sent:** Thursday, February 8, 2018 5:07 PM  
**To:** Slade, Rose <[Rose.Slade@energytransfer.com](mailto:Rose.Slade@energytransfer.com)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>  
**Subject:** RE: ETC Field Services (West Boiler Sump) GW-010

Ms. Slade:  
I am a little confused. Why is this sump assigned or associated with GW-10? It appears that the classifier tanks are as well. Please clarify. Also, was a hydrostatic test permit requested from Brad Jones (NMOCD-Santa Fe)?  
Thanks,  
Olivia

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**From:** Slade, Rose [<mailto:Rose.Slade@energytransfer.com>]  
**Sent:** Tuesday, January 2, 2018 9:25 AM  
**To:** Yu, Olivia, EMNRD <[Olivia.Yu@state.nm.us](mailto:Olivia.Yu@state.nm.us)>; Billings, Bradford, EMNRD <[Bradford.Billings@state.nm.us](mailto:Bradford.Billings@state.nm.us)>  
**Cc:** Lowry, Joel <[JLowry@trcsolutions.com](mailto:JLowry@trcsolutions.com)>  
**Subject:** ETC Field Services (West Boiler Sump) GW-010

Please find attached the Field Activities and Below-Grade Tank Closure Request and Final C-144 for the ETC Field Services, West Boiler Sump BGT at the ETC Jal #3 Plant. This site is located in Unit letter "L", Section 33, Township 24 South, Range 37 East in Lea County, NM. If you have any questions or need any additional information, please feel free to contact me by phone or email. Thank you.  
Respectfully,  
Rose Slade



**Rose L. Slade**  
Senior Environmental Specialist,  
Waste, Water, Remediation  
Energy Transfer Partners  
P: 210.403.6525  
C: 432.940.5147

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**From:** Oberding, Tomas, EMNRD  
**To:** [Slade, Rose](#)  
**Cc:** [Lowry, Joel](#)  
**Subject:** RE: ETC Jal #3 West Boiler Sump  
**Date:** Wednesday, August 16, 2017 1:38:46 PM

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Aloha Rose and Joel,

Thank you for the update on this site.  
The OCD approves the plan of action as outlined.  
Please stay safe and keep me informed.  
Mahalo  
-Doc

Tomáš 'Doc' Oberding PhD  
Hydrologist, Adv-District 1  
Oil Conservation Division, EMNRD  
(505) 476-3403  
E-Mail: [tomas.oberding@state.nm.us](mailto:tomas.oberding@state.nm.us)

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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 ground water, 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, local laws and/or regulations.

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**From:** Slade, Rose [mailto:Rose.Slade@energytransfer.com]  
**Sent:** Thursday, August 3, 2017 2:18 PM  
**To:** Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>  
**Cc:** Lowry, Joel <JLowry@trcsolutions.com>  
**Subject:** ETC Jal #3 West Boiler Sump

Good afternoon sir,

I hope you have been doing well today sir.

Please find attached the Proposed Closure Strategy Report for the ETC's Jal #3 West Boiler Sump. This sir is one of the last three (3) BGT's left to be closed at our ETC Jal #3 Plant in Lea County NM. The West Boiler Sump is best described as a fiberglass, 160 bbl. tank, utilized to contain wastewater from the fresh water treatment system and from the steam boiler buildings.

This BGT is located in the south-central portion of the plant in a highly congested area as you will see on the attachment #2 site diagram. The removal of the West Boiler Sump from its current location poses a risk to human health and safety due to its proximity to the mechanical building and the multiple above and underground utilities pipelines surrounding the BGT. One of our biggest concerns is the plants high pressure steam line, which is located on an adjacent pipe rack directly above the BGT. If this high pressure steam line was to be impacted it could cause serious injuries

and possible death to anyone in the vicinity of that area due to not only the high pressure of the steam-line but also from the heat associated with the steam-line.

ETC is requesting approval from the Oil Conservation Division, EMNRD to leave the BGT in place and remove at the time of abandonment. ETC proposes the following remediation strategies designed to advance the West Boiler Sump toward an NMOCD-approved closure.

1. Removal of all the contents from the BGT and disposing of the contents at an NMOCD-permitted facility, followed by a thorough cleaning to allow for hydrostatic test and/or detailed inspection.
2. Conducting a hydrostatic test and/or detailed inspection of the floor and sidewalls of the BGT to determine if evidence of a release is present. In the event of an inspection it will include checking for holes and/or evidence of failure in the floor and sidewalls of the BGT.
3. In the event there is an indication of a potential release that is discovered during the hydrostatic test and/or inspection the potential release would be investigated and reported as necessary.
4. An alternative closure method may include utilizing a pneumatic saw to cut five (5) holes in the bottom of the fiberglass BGT. The collected samples would be submitted to the laboratory for analysis for BTEX, TPH, and chloride concentrations, the results of which would be provided to the NMOCD.
5. In the event no evidence of a release(s) are discovered during the hydrostatic test, detailed inspection and/or upon receiving laboratory analytical results, and upon receiving NMOCD permission, the tops of the BGT would be cut below the existing grade at approximately four (4) ft. bgs. Upon cutting the tops of the BGT to four (4) ft. bgs, the tank would be backfilled to with locally-sourced, non-impacted material. The final soil cover would consist of engineered fill used throughout the plant.
6. Upon backfilling and compacting the affected area, a permanent steel-marker would be placed to document the location of the closed BGT.
7. Upon receiving NMOCD permission and completion of the above mentioned field activities, ETC will prepare and submit a Final C-144 and Closure Report detailing field activities and laboratory analytical results from confirmation soil samples.

If you have any questions, or if additional information is required, please feel free to call Joel or myself.

Respectfully,

*Rose Slade*



**Rose L. Slade**

Senior Environmental Specialist,  
Waste, Water, Remediation  
Energy Transfer Partners

**O:** 210.403.6525

**C:** 432.940.5147