



ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS GP, LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

NV

January 10, 2023

Via Email

Mr. Nelson Velez
Environmental Specialist - Adv
New Mexico (NM) Energy, Minerals and Natural Resources Department
(EMNRD) Oil Conservation Division (OCD)
1000 Rio Brazos Road
Aztec, New Mexico 87410

Re: Variance Request
2D-1 Well Tie/Bruce R Sullivan #2 (7/29/21) Release
OCD Incident ID No. NAPP2121054964

Mr. Velez,

Enterprise Field Services, LLC submits this variance request for an alternate lesser number of sampling events and sampling stations per New Mexico Administrative Code (NMAC) 19.15.30.9 (D) for the 2D-1 Well Tie/Bruce R Sullivan #2 (7/29/21) Release Site, OCD Incident ID No. NAPP2121054964. Enterprise requests that the five (5) consecutive monthly groundwater sampling events is sufficient for site closure and that it demonstrates that no residual impact to groundwater above groundwater quality standards exists.

Included in this variance request are groundwater analytical summary tables, summarizing the groundwater analytical results for the five (5) consecutive monthly sampling events, a site map and a groundwater gradient map. Additional information on the five (5) consecutive monthly sampling events will be included in the proceeding abatement completion report submittal.

If you have any questions or require any additional information, please do not hesitate to contact me at (505) 599 2286 or tjlong@eprod.com or Brian Stone Environmental Manager at (970) 263-3020 or bmstone@eprod.com.

Thank you,

A handwritten signature in blue ink, appearing to read 'Jon E. Fields'.

Jon E. Fields
Director, Field Environmental

A handwritten signature in blue ink, appearing to read 'Rodney M. Sartor'.

Rodney M. Sartor
Senior Director, Environmental

/bjm
Attachments

TABLE 1
2D-1 Well Tie/Bruce R Sullivan #2 (7/29/21)
GROUNDWATER ANALYTICAL SUMMARY - DETECTED VOLATILE ORGANIC COMPOUNDS

Sample I.D.	Sample Date	Benzene (µg/L)	Toluene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	Naphthalene (µg/L)	1,2,4- Trimethylbenzene ^{1,2} (µg/L)	1,3,5- Trimethylbenzene ^{1,2} (µg/L)	2-Methylnaphthalene ^{1,2} (µg/L)
New Mexico Water Quality Control Commission Human Health Standards		5	1,000	700	620	30	NE	NE	NE
Water Sample Collected from the Excavation (August 2021)									
EW-1*	8.11.21	5.3	<5.0	<5.0	<7.5	NA	NA	NA	NA
Water Samples Collected from the Temporary Sample Point (August 2021)									
MW-1	8.17.21	33	3.2	1.3	17	4.9	7.6	4.8	4.8
Water Samples Collected from the Temporary Monitoring Wells									
MW-1R ^A	3.9.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	4.13.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	5.12.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	6.14.22	<1.0	<1.0	<1.0	<1.5	NA	NA	NA	NA
	8.5.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
MW-2	3.9.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	4.13.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	5.12.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	6.14.22	<1.0	<1.0	<1.0	<1.5	NA	NA	NA	NA
	8.5.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
MW-3	3.9.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	4.13.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	5.12.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	6.14.22	<1.0	<1.0	<1.0	<1.5	NA	NA	NA	NA
	8.5.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
MW-4	3.9.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	4.13.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	5.12.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	6.14.22	<1.0	<1.0	<1.0	<1.5	NA	NA	NA	NA
	8.5.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
MW-5	3.9.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	4.13.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	5.12.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0
	6.14.22	<1.0	<1.0	<1.0	<1.5	NA	NA	NA	NA
	8.5.22	<1.0	<1.0	<1.0	<1.5	<2.0	<1.0	<1.0	<4.0

Notes:

Concentrations in **bold** and yellow exceed the applicable WQCC HHS

* = The sample collected from the excavation was only analyzed for benzene, toluene, ethylbenzene, and xylenes.

¹ = Constituent is not identified as "toxic pollutant" under 20.6.2 New Mexico Administrative Code (NMAC).² = Constituent is not identified as a priority pollutant under the Federal Clean Water Act (CWA).^A = During March 2022, temporary monitoring well MW-1R was completed to replace MW-1.

µg/L = microgram per liter

NA = Not Analyzed

NE = Not Established

<1.0 = The numeral (in this case "1.0") identifies the laboratory reporting limit (RL) or practical quantitation limit (PQL).

TABLE 2 2D-1 Well Tie/Bruce R Sullivan #2 (7/29/21) GROUNDWATER ANALYTICAL SUMMARY - INORGANICS, PHYSICAL, AND CHEMICAL PROPERTIES														
Sample I.D.	Sample Date	Fluoride (mg/L)	Chloride (mg/L)	Sulfate (mg/L)	Nitrate + Nitrite (mg/L)	Bromide (mg/L)	Phosphorus (mg/L)	Calcium (mg/L)	Magnesium (mg/L)	Potassium (mg/L)	Sodium (mg/L)	Total Dissolved Solids (mg/L)	Conductivity (µmhos/cm)	Total Alkalinity (mg/L Ca)
New Mexico Water Quality Control Commission Human Health Standards and Domestic Water Supply Standards		1.6	250	600	11	NE	NE	NE	NE	NE	NE	1,000	NE	NE
Water Samples Collected from the Excavation (August 2021)														
EW-1*	8.11.21	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Water Samples Collected from the Temporary Sample Point (August 2021)														
MW-1	8.17.21	0.79	62	4,000	<1.00	<0.50	<2.5	530	78	13	1,300	6,300	7,200	427.2
Water Samples Collected from the Temporary Monitoring Wells														
MW-1R ^A	3.9.22	NA	49	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	4.13.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5.12.22	NA	30	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	6.14.22	NA	31	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8.5.22	NA	22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-2	3.9.22	NA	30	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	4.13.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5.12.22	NA	24	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	6.14.22	NA	25	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8.5.22	NA	26	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-3	3.9.22	NA	11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	4.13.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5.12.22	NA	13	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	6.14.22	NA	18	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8.5.22	NA	23	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-4	3.9.22	NA	8.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	4.13.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5.12.22	NA	14	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	6.14.22	NA	22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8.5.22	NA	27	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-5	3.9.22	NA	45	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	4.13.22	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	5.12.22	NA	40	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	6.14.22	NA	42	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	8.5.22	NA	37	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

Concentrations in **bold** and yellow exceed the applicable WQCC HHS or DWSS

* = The sample collected from the excavation was only analyzed for benzene, toluene, ethylbenzene, and xylenes.

^A = During March 2022, temporary monitoring well MW-1R was completed to replace MW-1.

mg/L = milligram per liter

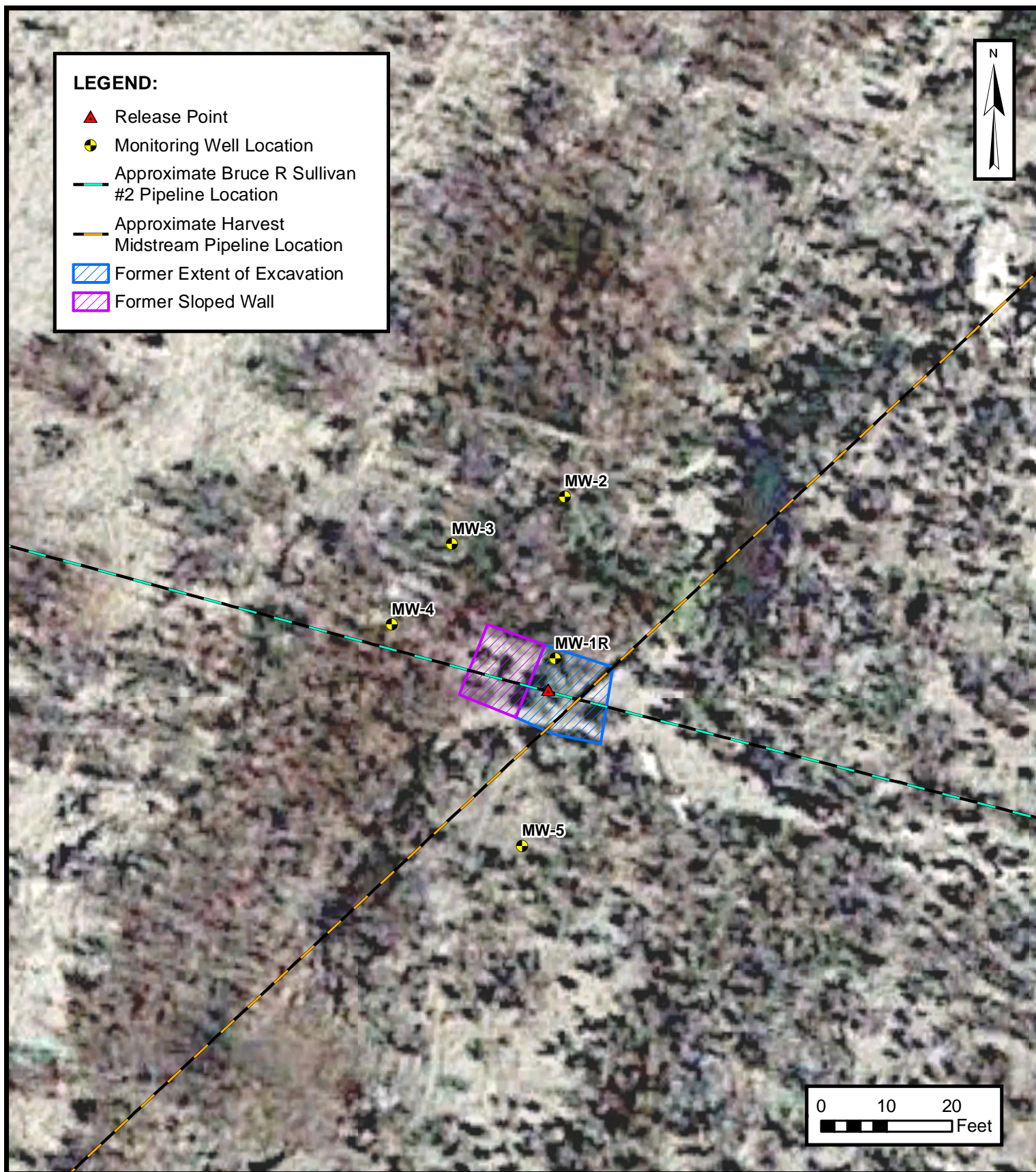
µmhos/cm = micromhos per centimeter

Ca = Calcium

NA = Not Analyzed

NE = Not Established

<1.0 = The numeral (in this case "1.0") identifies the laboratory reporting limit (RL) or practical quantitation limit (PQL).



SITE MAP

ENTERPRISE FIELD SERVICES, LLC
2D-1 WELL TIE/BRUCE R SULLIVAN #2 (7/29/21)
Unit Letter I, S23 T28N R10W, San Juan County, New Mexico
36.644538° N, 107.857891° W

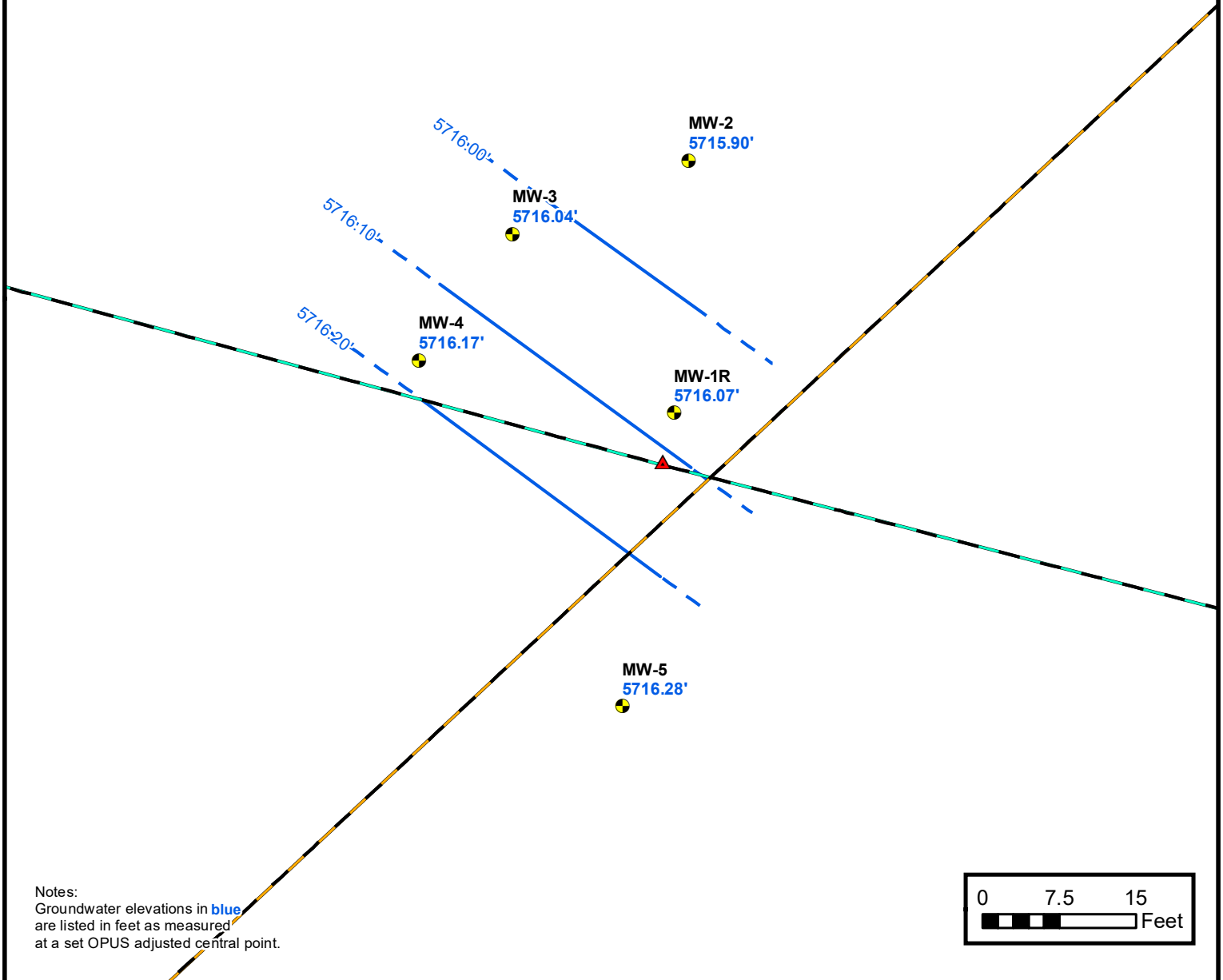
PROJECT NUMBER: 05A1226149

FIGURE

3

LEGEND:

- ▲ Release Point
- Monitoring Well Location
- Approximate Bruce R Sullivan #2 Pipeline Location
- Approximate Harvest Midstream Pipeline Location
- Groundwater Elevation Contour (0.10')
- - Inferred Groundwater Elevation Contour

**GROUNDWATER GRADIENT MAP (MARCH 2022)**

ENTERPRISE FIELD SERVICES, LLC
 2D-1 WELL TIE/BRUCE R SULLIVAN #2 (7/29/21)
 Unit Letter I, S23 T28N R10W, San Juan County, New Mexico
 36.644538° N, 107.857891° W

PROJECT NUMBER: 05A1226149

FIGURE
4A

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 175080

CONDITIONS

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 175080
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Accepted for the record. Please see App ID 218425 for most updated status.	5/22/2023

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Melanie A. Kenderdine
Cabinet Secretary-Designate

Ben Shelton
Deputy Secretary (Acting)

Gerasimos "Gerry" Razatos
Division Director (Acting)
Oil Conservation Division



Thomas Long
Enterprise Products Company
615 Reilly Ave.
Farmington, NM 87401

August 15, 2024

RE: Approval for Request for Variance and Abatement Completion Report at the 2D-1 Well Tie/Bruce R Sullivan #2, Incident ID NAPP2121054964

Mr. Long,

The Oil Conservation Division (OCD) has received a request for variance and an abatement completion report prepared on behalf of Enterprise Field Services, LLC by Ensolum, LLC. The NMOCD has reviewed both document submissions and determined the request for variance and closure request to be satisfactory for approval.

The available information indicates Enterprise has met the exemption clause within Paragraph 7 of Subsection A of 19.15.30.12 paragraph A(7) NMAC which in part states, "or in a manner that will likely result in compliance with the standards and requirements set forth in 19.15.30.9 NMAC within one (1) year after notice is required to be given pursuant to 19.15.29.9 NMAC provided that the division does not object to the abatement action."

OCD approved the abatement action via excavation of the impacted vadose zone soils at the source of the release. Enterprise had provided an initial Form C-141 within the allowable time frame (15 days) from the date of discovery. All previous laboratory results from the five (5) test wells had either no analytical detection or were substantially below the New Mexico Water Quality Control Commission's allowable concentrations for the constituent of concern, namely benzene.

Due to the existing conditions stated above, the variance request for an alternative lesser number of samples to the eight (8) consecutive sampling requirements within Subsection D of 19.15.30.9 NMAC to meet the applicable abatement standards in Subsections A, B and C of 19.15.30.9 NMAC is approved.

If you have any questions, please contact Mike Buchanan of the Environmental Incident Group at (505) 490-0798 or by email at michael.buchanan@emnrd.nm.gov.

Respectfully,

Rosa M. Romero

Rosa Romero
Environmental Bureau Chief
RR/mb

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State of New Mexico
Energy, Minerals and Natural Resources
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1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 218425

CONDITIONS

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID:	241602
	Action Number:	218425
	Action Type:	[UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Variance and Closure Request for the groundwater impact at 2D-1 Well Tie Bruce Sullivan #2, NAPP2121054964 has been approved, letter of approval for closure is attached at the end of the variance request PDF.	8/15/2024