Stantec Consulting Services Inc.
11311 Aurora Avenue
Des Moines, IA 50322-7908

September 15, 2025

Ms. Ashley Maxwell, Environmental Specialist
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
1000 Rio Brazos Road
Aztec, New Mexico 87410

Reference: Work Plan for Hydrocarbon Recovery Testing Activities
Fogelson #4-1
New Mexico Oil Conservation Division Incident Number nAUTOfAB000192

Dear Ms. Maxwell:

On behalf of El Paso CGP Company, LLC (EPCGP), Stantec Consulting Services Inc. (Stantec) is submitting this Work Plan for enhanced hydrocarbon recovery testing activities utilizing mobile dual-phase extraction (MDPE) methods at the Fogelson #4-1 site (site) located in the San Juan River Basin. MDPE activities are to be conducted from monitoring well MW-5, where measurable light non-aqueous phase liquid (LNAPL) continues to be present. A 30-day MDPE event conducted in 2024 was successful in removing or reducing hydrocarbons from monitoring wells MW-1R, MW-5, and MW-10. As LNAPL persists in monitoring well MW-5, an additional 30-day MDPE testing event is planned to recover the remaining LNAPL from MW-5. Figure 1 depicts the site layout.

Stantec will retain the services of CalClean Inc. (CalClean) to mobilize and provide equipment and personnel to perform a medium-term, 30-day high-vacuum MDPE testing event at the site, planned to occur by October 2025. All equipment is portable and will not be left at the site following the event. CalClean has obtained a “No Permit Required” determination for emissions from remediation equipment to be utilized during the MDPE testing event from the New Mexico Environment Department (NMED). A copy of the NMED letter is included as Attachment A.

MDPE Activities

MDPE is a process combining soil vapor extraction (SVE) with groundwater depression to maximize mass removal of LNAPL as both liquid- and vapor-phase hydrocarbons. CalClean’s system consists of a truck-mounted, high-vacuum, 25-horsepower vapor extraction and treatment system capable of an air flow in excess of 400 cubic feet per minute (cfm) at vacuums reaching 29 inches of mercury (in Hg). Information detailing the CalClean MDPE equipment is provided in Attachment B. CalClean uses a stinger tube (drop tube) to simultaneously remove liquid LNAPL, dissolved-phase contaminated groundwater, and vapors from each extraction point. This method can induce a hydraulic gradient toward the extraction well, creating groundwater depression and exposing the saturated zone or smear zone to SVE. The size of the cone of depression created is directly influenced by many factors including air flow of the system, vacuum, and the duration of the MDPE testing event.

Recovered liquids will be transferred to drums during the 30-day testing event. Recovered vapors will pass through and be treated using a thermal oxidizer before discharge to the atmosphere. Using this method, typical vapor destruction efficiencies are greater than 99%.

MDPE testing will focus on monitoring well MW-5 as the extraction point during the testing event. The MDPE equipment will be operated continuously for the duration of the 30-day period, subject to any necessary equipment maintenance. CalClean staff will stay on site for the duration of the testing event in a portable camper with contained facilities. If the system experiences an alarm condition (i.e., high vacuum, high water level, high temperature), the equipment will automatically shut down until the condition is cleared by CalClean staff. If more than two hours a day are spent on equipment maintenance or the system is shut down for any reason, the downtime will be added to the end of the testing event. The number of hours on the liquid ring pump will be recorded daily to determine whether downtime has occurred.

Stantec will be on site during startup and the first three days of the testing event, and for the final day of shutdown and demobilization. Stantec staff will document the initial and final site conditions, supervise the set-up and removal of the remediation equipment, and review system recovery volumes and effluent vapor concentrations to optimize hydrocarbon impact removal, in coordination with on-site CalClean staff. Vacuum readings and groundwater elevations at nearby monitoring wells will be collected to provide additional information regarding radius of influence (ROI) and groundwater flow patterns resulting from the extraction testing activities. CalClean personnel will provide oversight of the MDPE testing efforts and with concurrence from Stantec will adjust equipment, as necessary, to optimize hydrocarbon recovery and liquid recovery volume. Stantec office staff will also receive and review daily reports from CalClean and work with on-site staff for the duration of the testing event to help optimize operations. The equipment, including the drums, will be removed upon completion of the MPDE testing event and no equipment or materials will be left at the site.

Vapor samples will be collected periodically and analyzed with a Horiba® gas analyzer to estimate hydrocarbon concentration and destruction efficiency. To verify mass removal rates, vapor sample(s) will be collected during the MDPE testing event at the extraction wellhead via Tedlar® bags. To verify thermal oxidizer combustion efficiency, additional Tedlar® bag samples will be collected from the stack (post-ox) to compare against wellhead Tedlar® bag sample results collected from the extraction wellhead. The samples will be collected at the end of the first 24 hours of the MDPE testing event operation, after approximately 7 days into the MDPE testing event, and on the final day of the MDPE testing event. The Tedlar® bag samples will be submitted to Eurofins Environment Testing South Central, LLC, in Albuquerque, New Mexico for analysis of volatile organic compounds using Method TO-15, and total petroleum hydrocarbons (TPH) using Method TO-3.

Recovered liquids will be containerized on site in drums, for temporary storage during the testing event. Upon completion of the testing event, a local waste hauler will mobilize to the site to remove the drums from the site for disposal. The recovered liquids will be transported to Agua Moss, LLC, in Bloomfield, New Mexico for disposal under a C-138 ticket. Following the MDPE testing event, Stantec will complete a metering report documenting the amount of liquids removed, pursuant to New Mexico Office of the State Engineer (NMOSE) requirements.

Based on the continued presence of LNAPL in MW-5, quarterly groundwater sampling at the site was suspended following the second calendar quarter 2025 sampling event, and quarterly LNAPL monitoring and recovery was conducted in the third calendar quarter of 2025. Semi-annual groundwater sampling will resume in the fourth calendar quarter of 2025. Following the MDPE testing event, data collected from subsequent quarterly groundwater gauging and semi-annual groundwater sampling events at the site will be used to

evaluate the effectiveness of the MDPE testing event and provide recommendations for additional activities, if warranted. The data and results for the MDPE testing event will be summarized in the annual groundwater monitoring report for the site. The report will include a narrative of the activities completed, a tabulated summary of the data collected, estimated hydrocarbon recovery rates and totals, laboratory analytical reports, waste disposal documentation, and other pertinent information.

Health and Safety

A Site-Specific Health and Safety Plan (HASP) has been prepared for MDPE testing activities. The HASP includes guidance on the personal protective equipment (PPE) necessary for field activities, identified hazards associated with the field activities, and directions to the nearest medical facility. Flame-resistant clothing and Level D protective equipment will be worn, as required. A copy of the HASP will always be on site while work is being performed. The HASP will apply to Stantec employees, Stantec's subcontractors, and visitors at the site. If a subcontractor operates under their own HASP, it will be reviewed and referenced by Stantec prior to the start of field activities.

During the testing MDPE event, periodic ambient air monitoring may be conducted with a PID, hydrogen sulfide monitor, and explosimeter, as warranted. Monitoring instruments will be calibrated prior to use according to the manufacturer's specifications. Calibration information will be recorded in the field log book.

Schedule

The 30-day MDPE testing event will be initiated following receipt of a Pollution Recovery Amendment from the NMOSE. The results of the MDPE testing event will be documented in the 2025 Annual Report, anticipated to be submitted by April 1, 2026.

Please feel free to contact Joseph Wiley, Project Manager for EPCGP, at (713) 420-3475, or me if you have any questions or require additional information.

STANTEC CONSULTING SERVICES INC.

Stephen Varsa, P.G.
Principal Hydrogeologist
Phone: (515) 251-1020
steve.varsa@stantec.com

/srv:src:hls

cc: Marjorie Brown, BLM (ROW NMNM133839)
Joseph Wiley, EPCGP

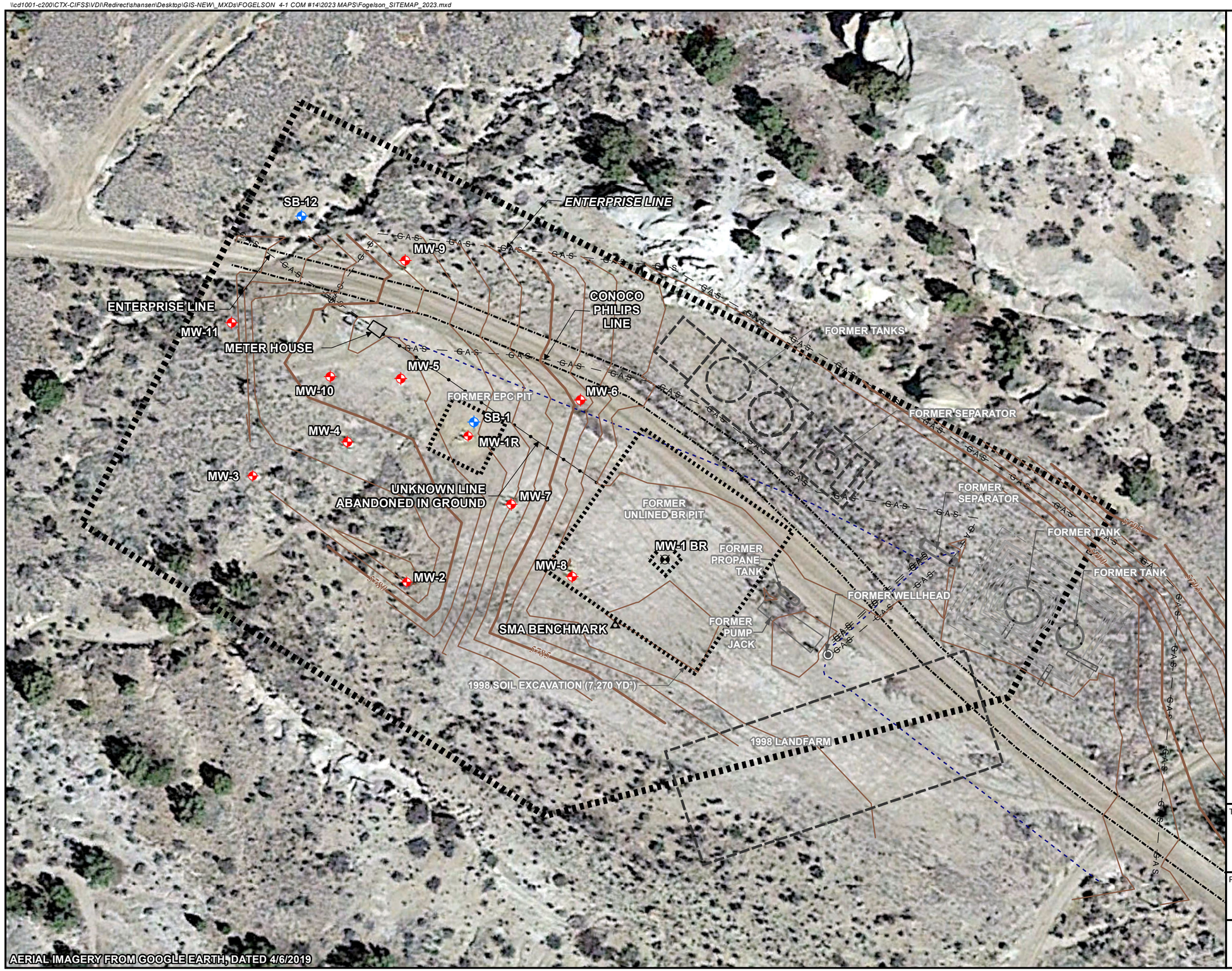
Reference: Work Plan for Hydrocarbon Recovery Testing Activities

Attachments

- Figure 1 – Site Plan
- Attachment A – NMED “No Permit Required” Letter
- Attachment B – MDPE System Schematic

FIGURE

\\cd1001-c200\CTX-CIFSS\VDI\Redirect\shansen\Desktop\GIS-NEW_MXDs\FOGELSON 4-1 COM #14\2023 MAPS\Fogelson_SITEMAP_2023.mxd



LEGEND:

- 5795 — APPROX. GROUND SURFACE CONTOUR AND ELEVATION, FEET
- ACCESS ROAD
- FORMER PIT OR EXCAVATION
- GAS — GAS LINE
- UNDERGROUND CABLE
- RIGHT OF WAY BOUNDARY
- MONITORING WELL
- SOIL BORING
- FORMER WELLHEAD
- SMA BENCHMARK
- FORMER MONITORING WELL (NOT EPCGP-OWNED)

N

SCALE IN FEET

0 40 80

REVISION	DATE	DESIGN BY	DRAWN BY	REVIEWED BY
	2024-02-28	SAH	SAH	SRV

TITLE:

SITE PLAN

PROJECT:

FOGELSON 4-1
SAN JUAN RIVER BASIN
SAN JUAN COUNTY, NEW MEXICO

Stantec

Figure No.: **1**

ATTACHMENT A

MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

March 25, 2024

Noel Shenoi
Principal Environmental Engineer
CALClean, Inc.
1790 N. Case Street
Orange, CA 92865

Air Quality No Permit Required (NPR)
No. 10234
Agency Interest No. 39716 - PRN20240001
CalClean SVE systems
AIRS No. 357771665

Dear Mr. Shenoi:

This letter acknowledges the receipt of your request for a permit applicability determination dated March 19 2024 for an Oil & Gas facility in New Mexico. The request was received by the Department on March 19, 2024.

Operation of numerous identical truck-mounted soil vapor extraction (SVE) systems, used for remediation at gas station sites and other sites with petroleum hydrocarbons, such as oil field sites, pipeline sites, may commence State-Wide (excluding Bernalillo County unless additional approval received), as represented in the request.

The Department has not conducted a review of the information or verified any emission calculations or regulatory analysis. It is the responsibility of the owner and/or operator of the facility to determine applicability and to comply with all existing, revised, and new applicable regulations. This includes requirements to apply for a 20.2.72 NMAC - Construction Permits or 2.73 - Notice of Intent and Emissions Inventory Requirements. The owner and/or operator of the facility is advised to keep records of the emission calculations and regulatory applicability.

As there are emission sources remaining at the site the department will change the status from a Notice of Intent to a No Permit Required. Please be advised that changing the status of the facility is based on the company's determination the site no longer requires a Notice of Intent due to changes in production or equipment and that the AQB has not reviewed the emissions from the remaining sources.

This facility may be subject to state and federal regulations ***such as*** those found in Table 1.

Table 1: Other Regulations

Citation	**Title**
20.2.38 NMAC	Hydrocarbon Storage Facilities
20.2.50 NMAC	Oil and Gas Sector: Ozone Precursor Pollutants
20.2.61 NMAC	Smoke and Visible Emissions
20.2.70 NMAC	Operating Permits
40 CFR 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

Citation	Title
40 CFR 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR 60, Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Production Transmission and Distribution
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Please be advised that this No Permit Required determination was based upon the application submitted and these sources, when constructed, will be subject to inspection.

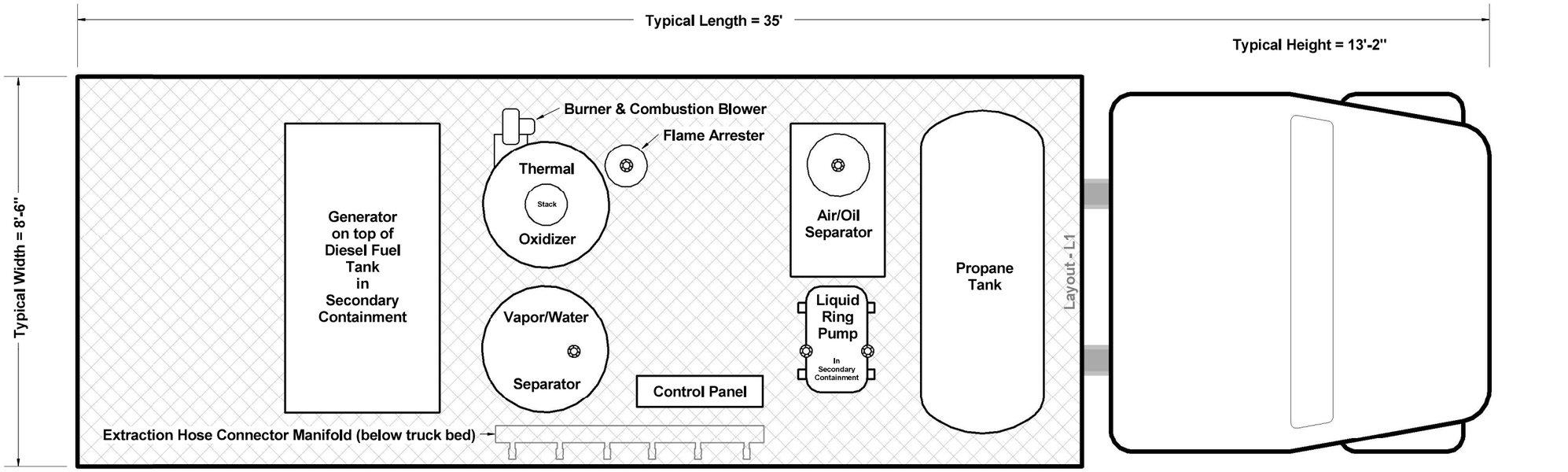
If you have any questions, please do not hesitate to contact me at 505-629-2718 or Joseph.Kimbrell@env.nm.gov.

Sincerely,

Joseph Kimbrell
Technical Services Manager
Permits Section
Air Quality Bureau

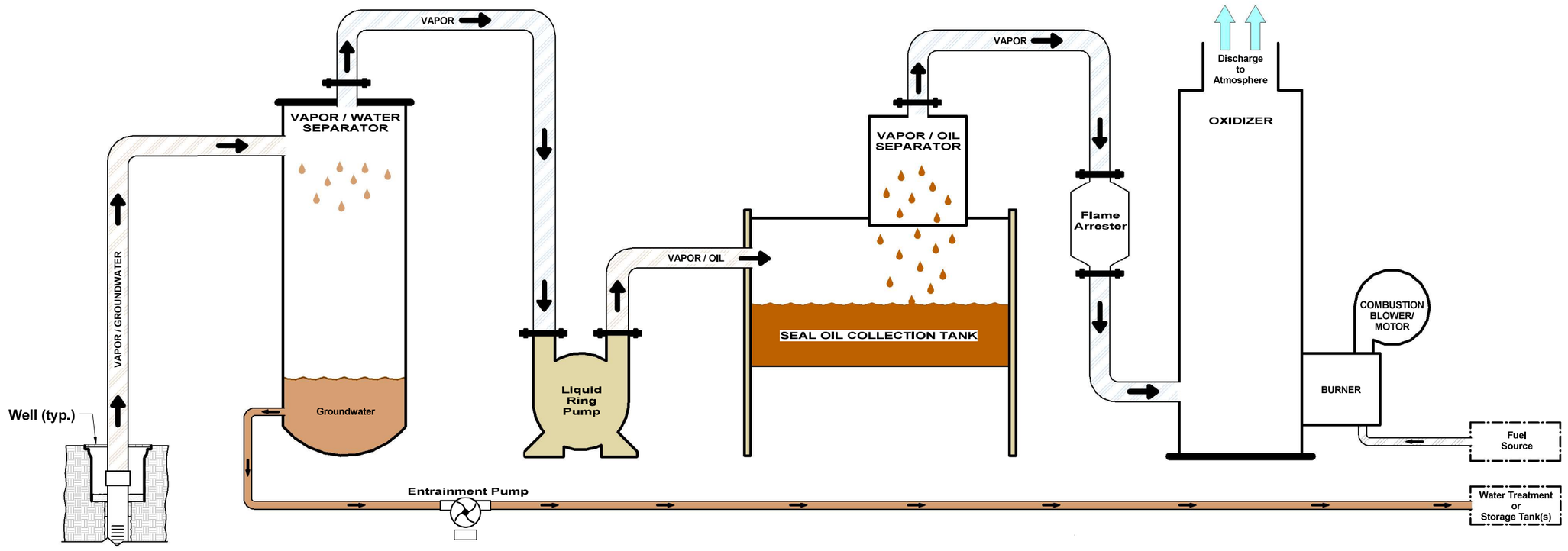
ATTACHMENT B

General Layout of a Typical CalClean Truck Mounted Mobile Remediation System (MRS)



1 LD-THK-L1 (FP)

Process Flow of a Typical CalClean Mobile Remediation System (MRS)



2 PFD THK-Typ (DV) Color

CALCLEAN
1790 N. CASE STREET ORANGE, CA 92865, US
714-935-2706 • www.calclean.com

CONFIDENTIAL

TYPICAL

Truck Mounted

Mobile Remediation Systems

using the
- Thermal/Catalytic -
method of treatment

Designed By:	Gordon Melin
Drafted By:	Power & Data
Approved By:	Gordon Melin
Print Date:	9/13/2019 10:46:13 AM

Layout and Flow Diagrams Truck

TYP-2.0

DESIGNSv2

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

CONDITIONS

Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002	OGRID: 7046
	Action Number: 505885
	Action Type: [UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	Report accepted for record.	3/11/2026