

2R - 423

CLOSURE

DATE:

2012

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, October 30, 2012 9:43 AM
To: 'Joseph Martinez'
Cc: Rodney Sartor; Bratcher, Mike, EMNRD
Subject: RE: RE: New Mexico Oil Conservation Division 2RP- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Martinez, et al.:

Good morning. Per the OCD's October 24, 2012 e-mail msg. with "Condition" for final approval requirement below, the OCD hereby accepts the Lea Land Disposal Facility waste disposition documentation provided in Appendix F of the Corrective Action Report issued for the Site on April 19, 2012.

Please contact me if you have questions. Thank you.

File: OCD Online "AP-423" (Closure)

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive, Santa Fe, New Mexico 87505
Office: (505) 476-3490
E-mail: CarlJ.Chavez@State.NM.US
Website: <http://www.emnrd.state.nm.us/ocd/>
"Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?" To see how, please go to: "Pollution Prevention & Waste Minimization" at <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

From: Joseph Martinez [mailto:Joseph.Martinez@southwestgeoscience.com]
Sent: Tuesday, October 30, 2012 9:04 AM
To: Chavez, Carl J, EMNRD
Cc: Rodney Sartor
Subject: RE: RE: New Mexico Oil Conservation Division 2RP- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Chavez,

We understand that the corrective actions have been approved upon receipt of the waste manifest associated with the disposal of the affected soil. A waste manifest which was provided and signed off by the Lea Land Disposal facility is available under Appendix F of the Corrective Action Report issued for the Site on April 19, 2012. The waste manifest documents the location and final volume of affected soils which were disposed of from the subject Site. Please confirm whether the documentation is adequate and if corrective actions are approved.

Regards,

Joseph W. Martinez | Manager, South Texas
Southwest Geoscience

Chavez, Carl J, EMNRD

From: Joseph Martinez <Joseph.Martinez@southwestgeoscience.com>
Sent: Tuesday, October 30, 2012 9:04 AM
To: Chavez, Carl J, EMNRD
Cc: Rodney Sartor
Subject: RE: RE: New Mexico Oil Conservation Division 2RP- 423 Trunk "A" Separator CA Report (April 19, 2012)

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Regards,

Joseph W. Martinez | Manager, South Texas
Southwest Geoscience

8829 Tradeway Street | San Antonio, Texas 78217
☎ 210.804.9922 | 📠 210.804.9944 | C 210.355.6280

www.southwestgeoscience.com

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, October 24, 2012 2:49 PM
To: rmsartor@eprod.com
Cc: Joseph.Martinez@southwestgeoscience.com; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Bratcher, Mike, EMNRD
Subject: FW: RE: New Mexico Oil Conservation Division 2RP- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Sartor:

The New Mexico Oil Conservation Division (OCD) has completed its review of the cover letter dated October 16, 2012 and 2RP-423 Trunk "A" Separator Letter Response to Corrective Action Report Review (October 3, 2012).

The OCD hereby approves the corrective action(s) and C-137EZ Form "Final Closure Report" (see attachment) for the above subject site with one condition. The OCD must receive all waste manifests (i.e., C-138 Form(s)) associated with the contaminated soil disposal referenced in the report.

The OCD will finalize the above via its OCD Online System for the "2RP-423" Trunk "A" Separator Facility upon adherence to the condition. Please contact me if you have questions. Thank you.

Please be advised that OCD approval of this corrective action(s) and/or report does not relieve Enterprise Products of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to land surface, ground water,

surface water, human health or the environment. In addition, OCD approval does not relieve Enterprise Products of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

Office: (505) 476-3490

E-mail: CarlJ.Chavez@State.NM.US

Website: <http://www.emnrd.state.nm.us/ocd/>

“Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?” To see how, please go to: “Pollution Prevention & Waste Minimization” at

<http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

From: Chavez, Carl J, EMNRD

Sent: Wednesday, August 08, 2012 4:46 PM

To: Joseph.Martinez@southwestgeoscience.com

Cc: Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Dade, Randy, EMNRD; Bratcher, Mike, EMNRD

Subject: RE: New Mexico Oil Conservation Division 2RPs- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has completed its review the cover letter dated April 25, 2012 and 2R-423 Trunk “A” Separator Corrective Action Report dated April 19, 2012.

OCD requires some additional work in order to adequately evaluate chlorides at the site and determine whether the site may be closed and/or issued a “No Further Action” as requested.

Enterprise Products (EP) request(s) the following:

- 1) Close the landfarms and reuse the remediated landfarm soils.
- 2) Issue No Further Action (NFA) or close the corrective action.

I. OCD Comments and/or Observations are:

- 1) EP collected one soil sample per soil boring (SB) from each of 6 SBs and no static water table was encountered and maps indicate the location is isolated and away from natural resource features.
- 2) EP excavated ~ 600 yds of contaminated soil and a polypropylene liner was installed on floor of excavation. 100 yds of treated soils were re-installed into excavation. EP later backfilled to grade with ~ 500 yds of imported soil.
- 3) OCD notices that EP is requesting closure of the small landfarms based on one vadose zone sample collected from a central location at the base of excavation, which met oil and gas regulations, i.e., 19.15.36 NMAC criteria.
- 4) There is currently about 475 yds of stockpiled soils on site for reuse.
- 5) OCD requires its OCD risk-based spill guidance soil criteria for the cleanup of the tank battery release, i.e., Benzene (10 ppm); BTEX (50 ppm); and TPH (5,000 ppm) based on the depth to static water level below ground.
- 6) OCD notices that the prescribed sample collection method for “small landfarm” was not completed; therefore, the cleanup standards under 19.15.36 NMAC have not yet been achieved.
- 7) OCD notices permeable lithology with depth throughout area.
- 8) EP removed berms around the landfarm and restored treatment cell to grade.
- 9) OCD notices that the source area contains petroleum hydrocarbons below the excavation depth (unspecified); however, the water table appears to be greater than 200 feet (NM Tech GIS) and the site is isolated.
- 10) B-1 within the excavation area met OCD cleanup standards from 99 – 100 feet bgl.

- 11) Landfarm TS samples and LC samples reveal exceedances to chloride. Others sampling conducted reveals chloride levels above 500 ppm as high as 3,300 ppm.

II. OCD conclusions and/or recommendations are:

A. Small Landfarm

- 1) C-137EZ Forms for the small landfarm with supporting soils quality information that meets the criteria with the exception of chlorides and must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm; TPH < 2,500 ppm; and Chlorides < 500 ppm. The operator may proceed with item 3 below and submittal of the form with information in order for the OCD to evaluate chlorides in the stockpiled landfarm treated soils.
- 2) About 500 yds of treated soils remain within the landfarm treatment cell. About 25 yds of this near LC-11 was contaminated and removed for disposition at the Lea Landfill in Eddy County. Currently, about 475 yds of treated soils from the small landfarm are stockpiled at the SW portion of the site and proposed for on and off-site beneficial reuse.
- 3) OCD requires a work plan for composite resampling of stockpiled soils mentioned above for chlorides to determine final disposition of the stockpiled soils. Depending on the concentrations; isolation; and depth to static water level; and background soils sampling, a risk-based chloride level may be proposed by the operator for reuse.
- 4) Landfarm closure is based on one "VS-1" soil sample collected in the center of the landfarm confirming levels below "Small Landfarm" standards including chlorides.

B. Vadose Zone Trunk "A" Separator Excavation

- 1) OCD spill cleanup criteria is: 10 ppm Benzene; 50 ppm BTEX; and 5,000 ppm TPH; and sampling is within or marginally above these limits. Chlorides were not analyzed in the soil borings.
- 2) OCD will defer the request for an additional soil boring within the excavated area at depth to an evaluation of the landfarm sampling for chlorides in item 3 above.
- 3) EP closure of the corrective action will leave residual hydrocarbons in place below the polypropylene liner placed at the base of the excavation.
- 4) EP collected one soil sample (with exception of B-1) per each soil boring (SB) drilled ~ 100 feet deep with an unspecified depth from each of 6 SBs.
- 5) The "B-1" soil sample location (56 – 57 feet bgl) detected hydrocarbons in the source area with depth, and a polypropylene liner was installed at the base of excavation (depth not specified) in order to prevent further leaching of hydrocarbons below the source area.
- 6) The excavation was backfilled without requesting OCD approval and the depth and dimensions of the excavation was not specified. Please provide this information with a diagram(s).

Please contact me to discuss. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive, Santa Fe, New Mexico 87505
Office: (505) 476-3490
E-mail: CarlJ.Chavez@State.NM.US

Website: <http://www.emnrd.state.nm.us/ocd/>

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2R - 423

**CORRECTIVE
ACTION PLANS**



April 25, 2012

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

Return Receipt Requested
7010 1870 0001 2945 3309

Mr. Mike Bratcher
Oil Conservation Division - District 2
811 S. First Street
Artesia, New Mexico 88210

**RE: Corrective Action Report
Enterprise Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy County, New Mexico**

2012 APR 30 P 1:18
RECEIVED OGD

Dear Mr. Bratcher:

Enterprise Products Operating LLC (Enterprise) is submitting the enclosed *Corrective Action Report* dated April 19, 2012 for the Enterprise Trunk A Separator facility (referred to as the "Site" hereinafter). The Site is located approximately eight (8) miles southwest of Carlsbad in Eddy County, New Mexico [NW ¼, SE ¼, Section 10, Township 23S, and Range 26E]. The Site is an approximate 2.8-acre separator facility associated with an Enterprise natural gas gathering system. The purpose of the *Corrective Action Report* is to provide documentation of investigation and corrective action activities performed at the Site as a result of identified historical petroleum hydrocarbons liquids leakage.

In 2007, Enterprise field operations identified stained soils indicative of historical leakage prior to and during the decommissioning of a former on-Site tank battery. The tank battery stored produced water and condensate which was separated from the natural gas stream on-Site. In November 2009, Southwest Geoscience (SWG) performed initial site investigation activities to evaluate the presence or absence of select petroleum hydrocarbon constituents of concern (COCs) in soils in exceedance of the Oil Conservation Division (OCD) Remediation Action Levels for Site with a total ranking score of zero (0), or the "OCD Remediation Action Levels" hereinafter. SWG advanced one (1) soil boring (B-1) at the Site to a depth of 100 feet below ground surface (bgs). Three (3) soil samples were collected and submitted for laboratory analysis of total petroleum hydrocarbons (TPH) gasoline range organics (GRO)/diesel range organics (DRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on the laboratory analytical results, TPH GRO/GRO and total BTEX concentrations were identified in the soil sample collected from 56 to 57 feet bgs in exceedance of the OCD Remediation Action Levels. However, the soil sample did not exhibit TPH concentrations in exceedance of the calculated American Petroleum Institute (API) Site-Specific TPH Risk-Based Screening Level (RBSL) in Residential Soil.

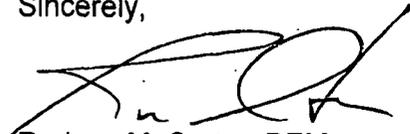
In July 2010, SWG issued a *Corrective Action Work Plan (CAWP)* which documented the findings of the initial site investigation activities, the proposed supplemental site investigation activities, and the proposed correction actions. The *CAWP* was approved by the OCD on July 13, 2010. In August 2010, supplemental site investigation activities were conducted in the vicinity of the former tank battery to further evaluate the magnitude and extent of petroleum hydrocarbons in the on-site soils. As part of the approved scope of work, six (6) additional soil borings (B-2 through B-7) were advanced to a depth of 100 feet bgs. One (1) soil sample was collected from each soil boring and submitted for laboratory analysis of TPH GRO/DRO and BTEX analysis.

Based on the laboratory analytical results, the soil samples collected from soil borings B-2 through B-7 did not exhibit TPH GRO/DRO, benzene, or total BTEX concentrations in exceedance of the OCD Remediation Action Levels.

In October of 2010, initial corrective action activities were conducted at the Site, which included the excavation and on-site treatment of approximately 400 cubic yards (cy) of petroleum hydrocarbon impacted soil. Confirmation soil samples were collected from the excavation walls and submitted for TPH GRO/DRO and BTEX analysis. Based on the laboratory analytical results, an additional 100 cy of soil was removed from the excavation sidewalls. The excavated soils were spread on-site in an approximate 12-inch lift and treated with a water/bioremediation agent (Remedy[®]) mixture and tilled/raked on a periodic basis to enhance the rate and thoroughness of petroleum hydrocarbon degradation. Soil confirmation samples were collected on a periodic basis to evaluate the concentrations of TPH GRO/DRO, BTEX, and chlorides. Based on the laboratory, analytical results approximately 100 cy of the treated soil was utilized to backfill the excavation and approximately 25 cy of impacted soil was transported off-site for disposal. The remaining treated soils, approximately 475 cy total, was stockpiled on-site which has been proposed for future on-site or off-site use by Enterprise. Prior to the commencement of excavation backfill activities, a polypropylene liner was installed on the excavation floor to prevent further vertical migration of petroleum hydrocarbon COCs remaining in-place which were identified in the soil sample collected from soil boring B-1 at 56 to 57 feet bgs. Approximately 400 cubic yards of imported soils was used to backfill the lower portion on-site excavation with 100 cy of the treated soil utilized to backfill the remainder of the excavation. A vadose zone soil sample collected from the center of the on-site landfarm treatment cell did not exhibit TPH GRO/DRO, benzene, total BTEX, or chlorides concentrations in exceedance of the NMAC *Small Landfarm Closure Performance Standards*.

Based on the results of the corrective actions, no further investigation or remediation appears to be warranted at this time. Should the OCD conclude that no further action is required at the Site, Enterprise respectfully requests a written response which documents the decision. Should you have any questions, comments or concerns, or need additional information, please feel free to contact me at 713-381-381-6629.

Sincerely,



Rodney M. Sartor, REM
Manager, Remediation

/dep
Attachment – *Subsurface Investigation Report* (APEX, June 9, 2011)

cc: Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr.,
Santa Fe, NM 87505

ec: Jim Heap, Enterprise Products
Joseph Martinez, Southwest Geosciences

RECEIVED OCD

2012 APR 30 P 1:07

CORRECTIVE ACTION REPORT

Property:

Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy County, New Mexico
(OCD Permit No. 2R-423)

April 19, 2012
SWG Project No. 0210002

Prepared for:

Enterprise Products Operating LLC
1100 Louisiana Street, Suite 1000
Houston, Texas 77002
Attention: Mr. Rodney Sartor

Prepared by:


Joseph W. Martinez
Manager, South Texas

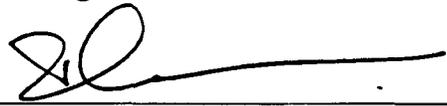

B. Chris Mitchell, P.G.
Principal Geoscientist

TABLE OF CONTENTS

1.0 INTRODUCTION	1
1.1 Site Description & Background.....	1
1.2 Site Ranking.....	2
1.3 Project Objective.....	3
1.4 Standard of Care & Limitations.....	3
2.0 SITE INVESTIGATION	3
2.1 Soil Borings.....	3
2.2 Soil Sampling Program.....	4
2.3 Laboratory Analytical Methods.....	4
2.4 Data Evaluation.....	5
3.0 CORRECTIVE ACTIONS	6
3.1 Excavation and Treatment Activities.....	6
3.2 Confirmation Soil Sampling.....	6
3.3 Laboratory Analytical Methods.....	7
3.4 Data Evaluation.....	8
3.5 Closure Activities.....	10
4.0 FINDINGS AND RECOMMENDATIONS	11

LIST OF APPENDICES

Appendix A:	Figure 1 – Topographic Map Figure 2 – Site Vicinity Map Figure 3 – Site Map
Appendix B:	Soil Boring Logs
Appendix C:	Photographic Documentation
Appendix D:	Tables
Appendix E:	Laboratory Data Reports & Chain of Custody Documentation
Appendix F:	Supporting Documents

CORRECTIVE ACTION REPORT

Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy County, New Mexico
(OCD Permit No. 2R-423)

SWG Project No. 0210002

1.0 INTRODUCTION

1.1 Site Description & Background

Southwest Geoscience has completed a Corrective Action Report for the Enterprise Products Operating LLC (Enterprise) Trunk A Separator facility located off Gillock Road, approximately eight (8) miles southwest of Carlsbad in Eddy County, New Mexico (NW ¼, SE ¼, Section 10, Township 23S, and Range 26E), referred to hereinafter as the "Site" or "subject Site." The Site is an approximate 2.8-acre separator facility associated with an Enterprise natural gas gathering system.

A topographic map is included as Figure 1, a site vicinity map composed from a 2011 aerial photograph is included as Figure 2, and site maps of the facility are included as Figure 3A and Figure 3B of Appendix A.

During the completion of routine maintenance and pigging¹ operations, condensate and produced water, which accumulate in the subject gathering pipeline system, are separated from the natural gas stream at the Site. The liquids separated from the natural gas stream are stored in the on-site storage tanks pending off-site disposal. The Site is currently improved with a tank battery on the southeast portion of the Site which includes four (4) above-ground storage tanks (ASTs) with approximate 90 to 300 barrel (bbl) storage capacities. This tank battery was constructed subsequent to the decommissioning and removal of the historic tank battery located on-site in 2007, formerly located adjacent west of the existing tank battery. Field operations identified stained soils indicative of historical leakage prior to and during the decommissioning of the former tank battery.

Initial site investigation activities were conducted at the Site by SWG in November of 2009 to evaluate the presence of petroleum hydrocarbons in the on-site soils as a result of historical petroleum hydrocarbon liquids storage and processing activities. The initial site investigation activities included the advancement of one (1) soil boring (B-1) to a depth of 100 feet below ground surface (bgs). Groundwater was not observed in soil boring B-1. Three (3) soil samples were collected from soil boring B-1 and submitted for total petroleum hydrocarbons (TPH) gasoline range organics (GRO)/diesel range organics (DRO) and benzene, toluene, ethylbenzene, and xylenes (BTEX) analysis utilizing EPA methods SW-846 #8015M and SW-846 #8021B, respectively.

¹ *Pigging in the maintenance of pipelines refers to the practice of using pipeline scrapper traps or 'pigs' to clean paraffin, produced liquids and debris from the interior of the pipeline. This is accomplished by inserting the pig into a 'pig launcher'. The launcher is then closed and the pressure of the product in the pipeline is used to push it along down the pipe until it reaches the receiving trap - the 'pig catcher'.*



GENERATOR WASTE PROFILE
PLEASE PRINT OR TYPE

Service Agreement on File? [] YES [] NO

Profile Number: _____

Renewal Date: _____

A. Waste Generator Information

- 1. Generator Name: Enterprise Operating Products LLC
2. SIC Code: 1311
3. Facility Street Address: NW 1/4 of SE 1/4 in S10, S23S R2S4
4. Phone: 713-381-6500
5. Facility City: Carlsbad
6. State/Province: New Mexico
7. Zip/Postal Code: 88220
8. Generator USEPA/Federal ID#: n/a
9. County: Eddy County
10. State/Province ID#: n/a
11. Customer Name: Same as above
12. Customer Phone: 713-870-5832
13. Customer Contact: Rodney Sartor
14. Customer Fax: NA

B. Waste Stream Information

- 1. Name of Waste: Contaminated Soil
2. State Waste Code:
3. Process Generating Waste: Condensate and produced water from a natural gas stream is stored on-site in above ground storage tanks.
4. Estimated Annual Volume: 100 Tons [X] TONS [] YARDS [] OTHER Specify
5. Personal Protective Equipment Requirements: NA
6. Transporter/Transfer Station: TDM Leasing
7. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip 8,9,10) [] YES [X] NO
8. Reportable Quantity (lbs.; kgs)
9. Hazard Class/ID#:
10. USDOT Shipping Name:
[] Check if additional information is attached. Indicate the number of attached pages: _____

GENERATOR'S CERTIFICATION (Please check appropriate response, sign and date below)

- 1. Is the waste represented by this waste profile sheet a "Hazardous Waste", as defined by USEPA, Mexican and/or state/province regulation, in the location where generated or ultimately managed? [] YES [X] NO
2. Does the waste represented by this waste profile sheet contain regulated radioactive material or Regulated concentrations of Polychlorinated Biphenyls (PCBs)? [] YES [X] NO
3. Does this waste profile sheet and all attachments contain true and accurate descriptions of the waste material? [X] YES [] NO
4. Has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the contractor? [X] YES [] NO
5. Is the analytical data attached hereto derived from testing a representative sample in accordance with 40 CFR 261.20 (c) or equivalent rules? [X] YES [] NO
6. Will all changes that occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? [X] YES [] NO

Certification Signature: [Signature] Title: Remediation Manager
Name (type or print): Rodney Sartor Company name: Enterprise Products Operating LLC
Lea Land, Inc. Management's Decision For LLI use only

- 1. Supplemental Information: _____
2. Precautions, Special Handling Procedures, or Limitation on Approval: _____

Special Waste Decision [] Approved [] Disapproved

Special Waste Approvals Person Signature: _____ Date: _____

LEA LAND DISPOSAL SITE NEW MEXICO

MILE MARKER #64 US HWY 62/180 - 50 MILES EAST OF CARLSBAD, NM - PHONE: (505) 887-4048

LEA LAND, LLC

1309 WEST MAIN STREET - OKLAHOMA CITY, OK 73106 - PHONE (405) 236-4257

NON-HAZARDOUS WASTE MANIFEST NO: **081506** PAGE OF 2 TRAILER NO: **760040**

G	3. COMPANY NAME Enterprise Operating Products, LLC	4. ADDRESS NW 1/4 of SE 1/4 in S10, S23, R254	5. PICK-UP DATE 3/21/2012	
	PHONE NO. (713) 381-8500	CITY STATE ZIP Carlsbad NM 88220	6. TNRC ID NO.	
B	7. NAME OR DESCRIPTION OF WASTE SHIPPED			
	Non-Regulated Non-Hazardous Waste			
N	8. CONTAINERS No. Type		9. TOTAL QUANTITY	10. UNIT Wt/Vol.
	1 CM			
E	12. COMMENTS OR SPECIAL INSTRUCTIONS			11. TEXAS WASTE ID #
	TRUNK-A SEPERATOR SITE TOTAL @ 58520			212831
R	14. IN CASE OF EMERGENCY OR SPILL, CONTACT			
	NAME Kiri Slaughter		PHONE NO. 575-887-4048	24-HOUR EMERGENCY NO.
O	13. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations, and are the same materials previously approved by LEA LAND, LLC.			
	PRINTED/TYPED NAME		SIGNATURE	DATE
T R A N S P O R T E R S	16. TRANSPORTER (1)		17. TRANSPORTER (2)	
	NAME TDM LEASING		NAME	
	TEXAS I.D. NO.		TEXAS I.D. NO.	
	IN CASE OF EMERGENCY CONTACT JEREMY		IN CASE OF EMERGENCY CONTACT	
	EMERGENCY PHONE (575) 381-4300		EMERGENCY PHONE	
	18. TRANSPORTER (1): Acknowledgment of receipt of material.		19. TRANSPORTER (2): Acknowledgment of receipt of material.	
PRINTED/TYPED NAME <i>Richard Lopez</i>		PRINTED/TYPED NAME		
SIGNATURE <i>Richard Lopez</i>		SIGNATURE		
DATE 3/21/2012		DATE		
D I S P O S I T O R S	ADDRESS Lea Land, LLC		PHONE 505-887-4048	
	ADDRESS Mile Marker 64, U.S. Hwy 62/180 30 Miles East of Carlsbad, NM		PHONE	
PERMIT NO. WM-01-035 - New Mexico		20. COMMENTS		
21. DISPOSAL FACILITY'S CERTIFICATION: I hereby certify that the above described wastes were delivered to this facility, that the facility is authorized and permitted to receive such wastes.				
AUTHORIZED SIGNATURE <i>Andrew Gutierrez</i>		CELL NO.	DATE 3/21/2012	TIME 11:35

GENERATOR: COPIES 1 & 6 DISPOSAL SITE: COPIES 2 & 3 TRANSPORTERS: COPIES 4 & 5

COPY 1

RECEIVED OCD
2012 APR 30 P 1:07

CORRECTIVE ACTION REPORT

Property:

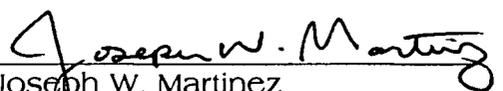
Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy County, New Mexico
(OCD Permit No. 2R-423)

April 19, 2012
SWG Project No. 0210002

Prepared for:

Enterprise Products Operating LLC
1100 Louisiana Street, Suite 1000
Houston, Texas 77002
Attention: Mr. Rodney Sartor

Prepared by:


Joseph W. Martinez
Manager, South Texas

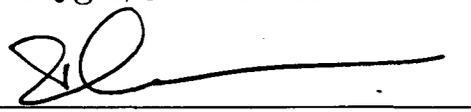

B. Chris Mitchell, P.G.
Principal Geoscientist

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Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, October 24, 2012 1:49 PM
To: rmsartor@eprod.com
Cc: Joseph.Martinez@southwestgeoscience.com; Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Bratcher, Mike, EMNRD
Subject: FW: RE: New Mexico Oil Conservation Division 2RP- 423 Trunk "A" Separator CA Report (April 19, 2012)
Attachments: Enterprise 2R-423 C-137EZ Approval 10-24-2012- .pdf

Mr. Sartor:

The New Mexico Oil Conservation Division (OCD) has completed its review of the cover letter dated October 16, 2012 and 2RP-423 Trunk "A" Separator Letter Response to Corrective Action Report Review (October 3, 2012).

The OCD hereby approves the corrective action(s) and C-137EZ Form "Final Closure Report" (see attachment) for the above subject site with one condition. The OCD must receive all waste manifests (i.e., C-138 Form(s)) associated with the contaminated soil disposal referenced in the report.

The OCD will finalize the above via its OCD Online System for the "2RP-423" Trunk "A" Separator Facility upon adherence to the condition. Please contact me if you have questions. Thank you.

Please be advised that OCD approval of this corrective action(s) and/or report does not relieve Enterprise Products of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to land surface, ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Enterprise Products of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive, Santa Fe, New Mexico 87505
Office: (505) 476-3490
E-mail: CarlJ.Chavez@State.NM.US

Website: <http://www.emnrd.state.nm.us/ocd/>

"Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?" To see how, please go to: "Pollution Prevention & Waste Minimization" at <http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

From: Chavez, Carl J, EMNRD
Sent: Wednesday, August 08, 2012 4:46 PM
To: Joseph.Martinez@southwestgeoscience.com
Cc: Sanchez, Daniel J., EMNRD; VonGonten, Glenn, EMNRD; Dade, Randy, EMNRD; Bratcher, Mike, EMNRD
Subject: RE: New Mexico Oil Conservation Division 2RPs- 423 Trunk "A" Separator CA Report (April 19, 2012)

Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has completed its review the cover letter dated April 25, 2012 and 2R-423 Trunk "A" Separator Corrective Action Report dated April 19, 2012.

OCD requires some additional work in order to adequately evaluate chlorides at the site and determine whether the site may be closed and/or issued a "No Further Action" as requested.

Enterprise Products (EP) request(s) the following:

- 1) Close the landfarms and reuse the remediated landfarm soils.
- 2) Issue No Further Action (NFA) or close the corrective action.

I. OCD Comments and/or Observations are:

- 1) EP collected one soil sample per soil boring (SB) from each of 6 SBs and no static water table was encountered and maps indicate the location is isolated and away from natural resource features.
- 2) EP excavated ~ 600 yds of contaminated soil and a polypropylene liner was installed on floor of excavation. 100 yds of treated soils were re-installed into excavation. EP later backfilled to grade with ~ 500 yds of imported soil.
- 3) OCD notices that EP is requesting closure of the small landfarms based on one vadose zone sample collected from a central location at the base of excavation, which met oil and gas regulations, i.e., 19.15.36 NMAC criteria.
- 4) There is currently about 475 yds of stockpiled soils on site for reuse.
- 5) OCD requires its OCD risk-based spill guidance soil criteria for the cleanup of the tank battery release, i.e., Benzene (10 ppm); BTEX (50 ppm); and TPH (5,000 ppm) based on the depth to static water level below ground.
- 6) OCD notices that the prescribed sample collection method for "small landfarm" was not completed; therefore, the cleanup standards under 19.15.36 NMAC have not yet been achieved.
- 7) OCD notices permeable lithology with depth throughout area.
- 8) EP removed berms around the landfarm and restored treatment cell to grade.
- 9) OCD notices that the source area contains petroleum hydrocarbons below the excavation depth (unspecified); however, the water table appears to be greater than 200 feet (NM Tech GIS) and the site is isolated.
- 10) B-1 within the excavation area met OCD cleanup standards from 99 – 100 feet bgl.
- 11) Landfarm TS samples and LC samples reveal exceedances to chloride. Others sampling conducted reveals chloride levels above 500 ppm as high as 3,300 ppm.

II. OCD conclusions and/or recommendations are:

A. Small Landfarm

- 1) C-137EZ Forms for the small landfarm with supporting soils quality information that meets the criteria with the exception of chlorides and must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm); TPH < 2,500 ppm; and Chlorides < 500 ppm. The operator may proceed with item 3 below and submittal of the form with information in order for the OCD to evaluate chlorides in the stockpiled landfarm treated soils.
- 2) About 500 yds of treated soils remain within the landfarm treatment cell. About 25 yds of this near LC-11 was contaminated and removed for disposition at the Lea Landfill in Eddy County. Currently, about 475 yds of treated soils from the small landfarm are stockpiled at the SW portion of the site and proposed for on and off-site beneficial reuse.
- 3) OCD requires a work plan for composite resampling of stockpiled soils mentioned above for chlorides to determine final disposition of the stockpiled soils. Depending on the concentrations; isolation; and depth to static water level; and background soils sampling, a risk-based chloride level may be proposed by the operator for reuse.
- 4) Landfarm closure is based on one "VS-1" soil sample collected in the center of the landfarm confirming levels below "Small Landfarm" standards including chlorides.

B. Vadose Zone Trunk "A" Separator Excavation

- 1) OCD spill cleanup criteria is: 10 ppm Benzene; 50 ppm BTEX; and 5,000 ppm TPH; and sampling is within or marginally above these limits. Chlorides were not analyzed in the soil borings.

- 2) OCD will defer the request for an additional soil boring within the excavated area at depth to an evaluation of the landfarm sampling for chlorides in item 3 above.
- 3) EP closure of the corrective action will leave residual hydrocarbons in place below the polypropylene liner placed at the base of the excavation.
- 4) EP collected one soil sample (with exception of B-1) per each soil boring (SB) drilled ~ 100 feet deep with an unspecified depth from each of 6 SBs.
- 5) The "B-1" soil sample location (56 – 57 feet bgl) detected hydrocarbons in the source area with depth, and a polypropylene liner was installed at the base of excavation (depth not specified) in order to prevent further leaching of hydrocarbons below the source area.
- 6) The excavation was backfilled without requesting OCD approval and the depth and dimensions of the excavation was not specified. Please provide this information with a diagram(s).

Please contact me to discuss. Thank you.

Carl J. Chavez, CHMM

New Mexico Energy, Minerals & Natural Resources Department

Oil Conservation Division, Environmental Bureau

1220 South St. Francis Drive, Santa Fe, New Mexico 87505

Office: (505) 476-3490

E-mail: CarlJ.Chavez@State.NM.US

Website: <http://www.emnrd.state.nm.us/ocd/>

"Why Not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward With the Rest of the Nation?" To see how, please go to: "Pollution Prevention & Waste Minimization" at

<http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

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

For State Use Only:
Registration #

Form C-137 EZ
Revised August 1, 2011

Submit 1 Copy to Santa Fe Office

REGISTRATION/ FINAL CLOSURE REPORT FOR SMALL LANDFARM

Section 7 of 19.15.36 NMAC defines a small landfarm as a centralized landfarm of two acres or less that has a total capacity of 2000 cubic yards or less in a single lift of eight inches or less, remains active for a maximum of three years from the date of its registration and that receives only petroleum hydrocarbon-contaminated soils (excluding drill cuttings) that are exempt or non-hazardous waste. The operator shall operate only one active small landfarm per governmental section at any time.

GENERAL INFORMATION

1. Small Landfarm Registration Small Landfarm Final Closure Report*
(*Must be submitted within three years from the registration date)
2. Operator: Enterprise Products Operating
Address: P.O. Box 4324, Houston, Texas 77210
Contact Person: Mr. Rodney Sartor Phone: (713) 381-6629
3. Location: NW /4 SE /4 Section 10 Township 23S Range 26E

REGISTRATION

1. As operator, are you the surface estate owner of the proposed site? Yes No If no, please attach a certification statement that demonstrates a written agreement is established with the surface estate owner authorizing the use of the site for the proposed small landfarm.
2. Will the proposed small landfarm comply with the siting requirements of Subsections A and B of 19.15.36.13 NMAC?
 Yes No
- A. Depth to ground water.
- No small landfarm shall be located where ground water is less than 50 feet below the lowest elevation at which the operator will place oil field waste.
- B. No surface waste management facility shall be located:
- within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - within an existing wellhead protection area or 100-year floodplain;
 - within, or within 500 feet of, a wetland;
 - within the area overlying a subsurface mine;
 - within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
 - within an unstable area, unless the operator demonstrates that engineering measures have been incorporated into the surface waste management facility design to ensure that the surface waste management facility's integrity will not be compromised.
3. Attach a plat and topographic map showing the small landfarm's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the small landfarm site; watercourses; fresh water sources, including wells and springs; oil and gas wells or other production facilities; and inhabited buildings within one mile of the site's perimeter.

Based on the information provided with this submittal, registration of a small landfarm can only be granted if the operator complies with the following understandings and conditions:

- The operator shall operate only one active small landfarm per governmental section at any time. No small landfarm shall be located more than one mile from the operator's nearest oil or gas well or other production facility.
- The operator shall accept only exempt or non-hazardous wastes consisting of soils (excluding drill cuttings) generated as a result of accidental releases from production operations, that are predominantly contaminated by petroleum hydrocarbons, do not contain free liquids, would pass the paint filter test and where testing shows chloride concentrations are 500 mg/kg or below.
 - The operator shall berm the landfarm to prevent rainwater run-on and run-off.
 - The operator shall post a sign at the site readable from a distance of 50 feet and listing the operator's name; small landfarm registration number; location by unit letter, section, township and range; expiration date; and an emergency contact telephone number.
 - The operator shall spread and disk contaminated soils in a single eight inch or less lift within 72 hours of receipt. The operator shall conduct treatment zone monitoring to ensure that the TPH concentration, as determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed 2500 mg/kg; and that the chloride

concentration, as determined by EPA method 300.1, does not exceed 500 mg/kg. The operator shall treat soils by disking at least once a month and by watering and adding bioremediation enhancing materials when needed.

- The operator shall maintain records reflecting the generator, the location of origin, the volume and type of oil field waste, the date of acceptance and the hauling company for each load of oil field waste received. The division shall post on its website each small landfarm's location, operator and registration date. In addition, the operator shall maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection. The operator shall maintain all records for five years following the small landfarm's closure.
- The operator shall submit a final closure report on a form C-137 EZ, together with photographs of the closed site, to the environmental bureau in the division's Santa Fe office.

CERTIFICATION

I hereby certify that the information submitted with this registration is true, accurate and complete to the best of my knowledge and belief and agree to the understandings and conditions of this registration.

Name: _____

Title: _____

Signature: _____

Date: _____

E-mail Address: _____

OCD REGISTRATION: Approved. Date : _____ Denied. Date: _____

Comments: _____

OCD Representative Signature: _____

Title: _____

OCD Registration Number: _____

FINAL CLOSURE REPORT

Were the landfarmed soils able to achieve the closure performance standards, listed below, within three years from the registration date? Yes No (Please provide laboratory analytical results)

- benzene, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 0.2 mg/kg;
- Total BTEX, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 50 mg/kg;
- TPH, as determined by EPA SW-846 method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, shall not exceed 500 mg/kg; and
- chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg.

If yes, were the additional closure requirements listed below satisfied? Yes No (Please provide photos)

- The operator shall re-vegetate soils remediated to the closure performance standards if left in place in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC.
- If the operator returns remediated soils to the original site, or with division permission, recycles them, re-vegetate the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC;
- The operator shall remove berms on the small landfarm and buildings, fences, roads and equipment; and
- The operator shall clean up the site and collect one vadose zone soil sample from three to five feet below the middle of the treatment zone, or in an area where liquids may have collected due to rainfall events; the vadose zone soil sample shall be collected and analyzed using the methods specified above for TPH, BTEX and chlorides.

If no, were the landfarmed soils that have not or cannot be remediated to the closure performance standards within three years removed to a division-approved surface waste management facility, and the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC and re-vegetated? Yes No (Please provide photos)

CERTIFICATION

I hereby certify that the information submitted with this final closure report is true, accurate and complete to the best of my knowledge and belief.

Name: Rodney M. Sartor

Title: Remediation Manager

Signature: _____

Date: 10/16/2012

E-mail Address: RMSartor@eprod.com

OCD CLOSURE REVIEW: Closure Approved. Date : 10/24/2012 Closure Denied. Date: _____

Comments: _____

OCD Representative Signature: _____ Santa Fe

Title: Environmental Engineer

OCD Registration Number: _____



ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

October 16, 2012

RECEIVED OCD

2012 OCT 22 P 12: 22

Return Receipt Requested
7010 1870 0001 2945 2685

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Office: (505) 476-3490

**RE: Letter Response to Correction Action Report Review
Enterprise Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy County, New Mexico**

Dear Mr. Chavez:

Enterprise Products Operating LLC (Enterprise) is submitting the enclosed *Letter Response to Correction Action Report Review* dated Oct. 3, 2012 for the Enterprise Trunk A Separator facility (referred to as the "Site" hereinafter). The Site is located approximately eight (8) miles southwest of Carlsbad in Eddy County, New Mexico [NW ¼, SE ¼, Section 10, Township 23S, and Range 26E]. The Site is an approximate 2.8-acre separator facility associated with an Enterprise natural gas gathering system.

The New Mexico Oil Conservation Division (OCD) reviewed the CAR issued for the Site and responded with comments/observations and conclusions/recommendations in a correspondence email on August 8, 2012. The purpose of this letter response is to provide information or responses to the conclusions and/or recommendations which were issued by the OCD. Based on these responses, no further investigation or remediation appears to be warranted at this time. Should the OCD conclude that no further action is required at the Site, Enterprise respectfully requests a written response which documents the decision. Should you have any questions, comments or concerns, or need additional information, please feel free to contact me at 713-381-6629.

Sincerely,

Rodney M. Sartor, REM
Manager, Remediation

/dep

Attachment – *Subsurface Investigation Report* (APEX, June 9, 2011)

ec: Jim Heap, Enterprise Products
Joseph Martinez, Southwest Geosciences

Southwest GEOSCIENCE

8829 Tradeway Street
San Antonio, Texas 78217

Ph: (210) 804-9922

Fax: (210) 804-9944

October 3, 2012

Enterprise Products Operating LLC

PO Box 4324

Houston, Texas 77210

Attention: Mr. Rodney M. Sartor

Re: Letter Response to Correction Action Report Review

Trunk A Separator (OCD Permit No. 2R-423)

NW ¼ of SE ¼ in S10, T23S, R26E

Carlsbad, Eddy County, New Mexico

N 32.316047°; W -104.278103°

SWG Project No.: 0210002

Mr. Sartor,

Southwest Geoscience (SWG) issued a Corrective Action Report (CAR) for the Enterprise Products Operating LLC (Enterprise) S. Carlsbad Compressor Station on April 19, 2012. The Enterprise Trunk A Separator is located in Carlsbad, Eddy County, New Mexico (NW ¼, SE ¼, Section 10, Township 23S, Range 26E), referred to hereinafter as the "Site" or "subject Site". A topographic map depicting the location of the Site is included as Figure 1 and a site vicinity map is included as Figure 2 of Attachment A. In addition, a site map indicating the approximate location of site investigation and corrective action activities is included as Figure 3 of Attachment A.

The New Mexico Oil Conservation Division (OCD) reviewed the CAR issued for the Site and responded with comments/observations and conclusions/recommendations in a correspondence email on August 8, 2012. The purpose of this letter response is to provide information or responses to the conclusions and/or recommendations which were issued by the OCD. The conclusions and/or recommendations issued by the OCD and SWG response are as follows:

A. SMALL LANDFARM

OCD Conclusion/Recommendation No. 1 (Section A. Small Landfarm) : *"C-137EZ Forms for the small landfarm with supporting soils quality information that meets the criteria with the exception of chlorides must be submitted to OCD Santa Fe when standards are achieved supporting landfarm closure, i.e., Benzene < 0.2 ppm; BTEX < 50 ppm; DRO/GRO < 500 ppm and TPH < 2,500 ppm; and chlorides <500 ppm. The operator may proceed with item 3 and submittal of the form with the information in order for the OCD to evaluate chlorides in the stockpiled landfarm treated soils."*

SWG Response: Soil confirmation samples were collected from the treated soils within the on-Site landfarms during one or more sampling evens in March, June, August and November of 2011. The soil confirmations samples were submitted for total petroleum hydrocarbons (TPH) gasoline range organics (GRO)/diesel range organics (DRO), benzene, toluene, ethylbenzene and xylenes (BTEX), and/or chlorides analysis utilizing EPA method SW-846 #8015M, EPA method SW-846 #8021B, and EPA method 300.0, respectively. The reported petroleum hydrocarbon constituents of concern (COC) concentrations were compared to the NMAC 19.15.36 *Small Landfarm Closure Performance Standards* (i.e.: concentrations of benzene ≤0.2 mg/Kg; total BTEX ≤50 mg/Kg; and TPH GRO/DRO ≤500 mg/Kg, (via method SW-846 #8015M); and chlorides ≤500 mg/Kg). Based on the laboratory analytical results, the soil confirmation samples collected from sampling points TS-1

Letter Response to Corrective Action Report Review

Trunk A Separator

Carlsbad, Eddy County, New Mexico

SWG Project No. 0210002

October 3, 2012

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through TS-20 did not exhibit benzene or total BTEX concentrations in exceedance of the *Small Landfarm Closure Performance Standards*. In addition, the most recent soil confirmation samples collected from sampling points LC-1 through LC-18 did not exhibit TPH GRO/DRO or chlorides concentrations in exceedance of the *Small Landfarm Closure Performance Standards* with the exception of the confirmation samples collected from the LC-11 sampling point. As a result, approximately 25 cubic yards of soil in the vicinity of the LC-11 sampling point was collected and transported off-site for disposal at Lea Landfill in Eddy County, New Mexico. The laboratory analytical results for the soil confirmation samples collected from the landfarm are summarized in Table 2 of Attachment B. A Form C-137 EZ has been completed for the Site and included for the landfarm treatment cell, refer to Attachment C. Photographic documentation of the former landfarm treatment cell is available, refer to Attachment D.

OCD Conclusion/Recommendation No. 2 (Section A. Small Landfarm) : *"About 500 yards of treated soils remain within the landfarm treatment cell. About 25 yards of this near LC-11 was contaminated and removed for disposition at the Lea Landfill in Eddy County. Currently, about 475 yds of treated soils from the small landfarm are stockpiled at the southwest portion of the Site and proposed for on and off-site beneficial reuse."*

OCD Conclusion/Recommendation No. 3 (Section A. Small Landfarm) : *"OCD requires a work plan for composite resampling of stockpiled soils mentioned above for chlorides to determine final disposition of the stockpiled soils. Depending on the concentrations; isolation; and depth to static water level; and background soils sampling, a risk-based chloride level may be proposed by the operator for reuse."*

SWG Response: Based on the laboratory analytical results, the most recent soil confirmation sample collected from sampling points LC-1 through LC-18 did not exhibit chlorides concentrations in exceedance of the *Small Landfarm Closure Performance Standards* with the exception of the confirmation samples collected from the LC-11 sampling point. As a result, approximately 25 cubic yards of soil in the vicinity of the LC-11 sampling point was collected and transported off-site for disposal at Lea Landfill in Eddy County, New Mexico. Therefore, a work plan for composite resampling of stockpiled soils does not appear to be warranted. In addition, establishment of a risk-based chloride level does not appear to be necessary. A summary of the most recent soil samples collected for chlorides analysis at each sampling point and the analytical results is provided on Table 2 of Attachment B.

OCD Conclusion/Recommendation No. 4 (Section A. Small Landfarm) : *"Landfarm closure is based on one (1) VS-1 soil sample collected in the center of the landfarm confirmation levels below the Small Landfarm Closure Performance Standards including chlorides."*

B. VADOSE ZONE TRUNK A SEPARTOR EXCAVTION

OCD Conclusion/Recommendation No. 1 (Section B. Vadose Zone Trunk A Separator Excavation): *"OCD spill cleanup criteria is: 10 ppm Benzene; 50 ppm BTEX; and 5,000 ppm TPH; and sampling is within or marginally above these limits. Chlorides were not analyzed in the soil borings."*

SWG Response: Based on the laboratory analytical results, the most recent soil confirmation samples collected from the excavation sidewalls did not exhibit benzene, total BTEX, or TPH GRO/DRO in exceedance of the OCD spill cleanup criteria (also known as the *OCD Remediation Action Levels*). Salt water storage tanks are not known to have previously located on the Site. The soil confirmation samples collected from the on-site excavation were not submitted for chlorides analysis. In addition, the soil samples

Letter Response to Corrective Action Report Review

Trunk A Separator

Carlsbad, Eddy County, New Mexico

SWG Project No. 0210002

October 3, 2012

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collected from the soil borings advanced at the Site were not submitted for chlorides analysis. It should be noted that the source area of the Site was investigated and remediated based on the *OCD Guidelines for Remediation of Leaks, Spills and Releases* which does not include *Remediation Action Levels* or sampling requirements for chlorides. Therefore, the soil samples collected from the soil borings were not submitted for chlorides analysis.

OCD Conclusion/Recommendation No. 2 (Section B. Vadose Zone Trunk A Separator Excavation): *"OCD will defer the request of an additional soil boring with the excavated area at depth to an evaluation of the landfarm sampling for chlorides in item 3 above."*

SWG Response: Based on the laboratory analytical results, the most recent soil confirmation sample collected from sampling points LC-1 through LC-18 did not exhibit chlorides concentrations in exceedance of the *Small Landfarm Closure Performance Standards* with the exception of the confirmation samples collected from the LC-11 sampling point. As a result, approximately 25 cubic yards of soil in the vicinity of the LC-11 sampling point was collected and transported off-site for disposal at Lea Landfill in Eddy County, New Mexico. Therefore, a work plan for composite resampling of stockpiled soils does not appear to be warranted. In addition, establishment of a risk-based chloride level does not appear to be necessary.

OCD Conclusion/Recommendation No. 3 (Section B. Vadose Zone Trunk A Separator Excavation): *"EP closure of the corrective action will leave residual hydrocarbons in place below the polypropylene liner placed at the base of the excavation."*

SWG Response: Due to the nature of the unconsolidated alluvial soils (Piedmont alluvial deposits) identified at the Site, the soils in excess of 20 feet bgs are not considered readily accessible for excavation due to structural and safety considerations. A polypropylene liner was installed on the excavation floor over the area with affected soils remaining in-place to inhibit the future vertical migration of moisture through the affected soil left in place and further protect the initial groundwater bearing unit. The liner was installed in the excavation as proposed in the Corrective Action Work Plan issued for the Site on July 6, 2010, which was approved by the OCD on July 13, 2010.

OCD Conclusion/Recommendation No. 4 (Section B. Vadose Zone Trunk A Separator Excavation): *"EP collected one soil sample (with exception of B-1) per each soil boring (SB) drilled ~ 100 feet deep with an unspecified depth from each of 6 SBs."*

SWG Response: A total of seven (7) soil borings (B-1 through B-7) were advanced at the Site to a terminus depth of 100 feet bgs, each. Three (3) soil samples were collected from soil boring B-1 at 13 to 14, 56 to 57, and 99 to 100 feet below ground surface (bgs). One (1) soil sample was collected from soil borings B-2 at 48 to 50 feet bgs, B-3 at 88 to 90 feet bgs, B-4 at 96 to 98 feet bgs, B-5 at 48 to 50 feet bgs, B-6 at 42 to 44 feet bgs, and B-7 at 48 to 50 feet bgs. Soil borings along with sample depth are summarized in Table 1 of Attachment A.

OCD Conclusion/Recommendation No. 5 (Section B. Vadose Zone Trunk A Separator Excavation): *"The B-1 soil sample location (56-57 feet bg) detected hydrocarbons in the source area with depth, and a polypropylene liner was installed at the base of the excavation (depth not specified) in order to prevent further leaching of hydrocarbons below the source area."*

SWG Response: During the excavation activities, soils were removed from depths of up to 20 feet bgs. Due to sluffing of material from the excavation sidewalls, the residing depth of the excavation floor ranged from 13 to 17 feet bgs. The polypropylene liner was installed

Letter Response to Corrective Action Report Review

Trunk A Separator

Carlsbad, Eddy County, New Mexico

SWG Project No. 0210002

October 3, 2012

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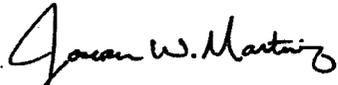
on the excavation floor, at the residing excavation depth, to prevent further leaching of petroleum hydrocarbons identified below the source area at 56 to 57 feet bgs.

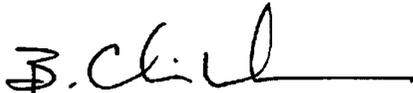
OCD Conclusion/Recommendation No. 6 (Section B. Vadose Zone Trunk A Separator Excavation): "The excavation was backfilled without requesting OCD approval and the depth and dimensions of the excavation was not specified."

SWG Response: Based on the laboratory analytical results, the soil confirmation samples collected from the final extents of the excavation did not exhibit benzene, total BTEX, or TPH GRO/DRO concentrations in exceedance of the OCD *Remediation Action Levels*. Therefore, the excavation was promptly backfilled to minimize safety risks associated with an open excavation in operational areas of the facility which experience regular vehicular traffic. Excavation activities continued horizontally and vertically with final dimension of up to 72 feet long by 26 feet wide. Soils were excavated from the Site at depths of up to 20 feet bgs. However, due to sidewall sluffing, the residing depth of the excavation ranged from 13 to 17 feet bgs.

SWG appreciates the opportunity to be of service on this project. If we can be of further assistance, please contact the undersigned.

Sincerely,


Joseph W. Martinez
Manager, South Texas

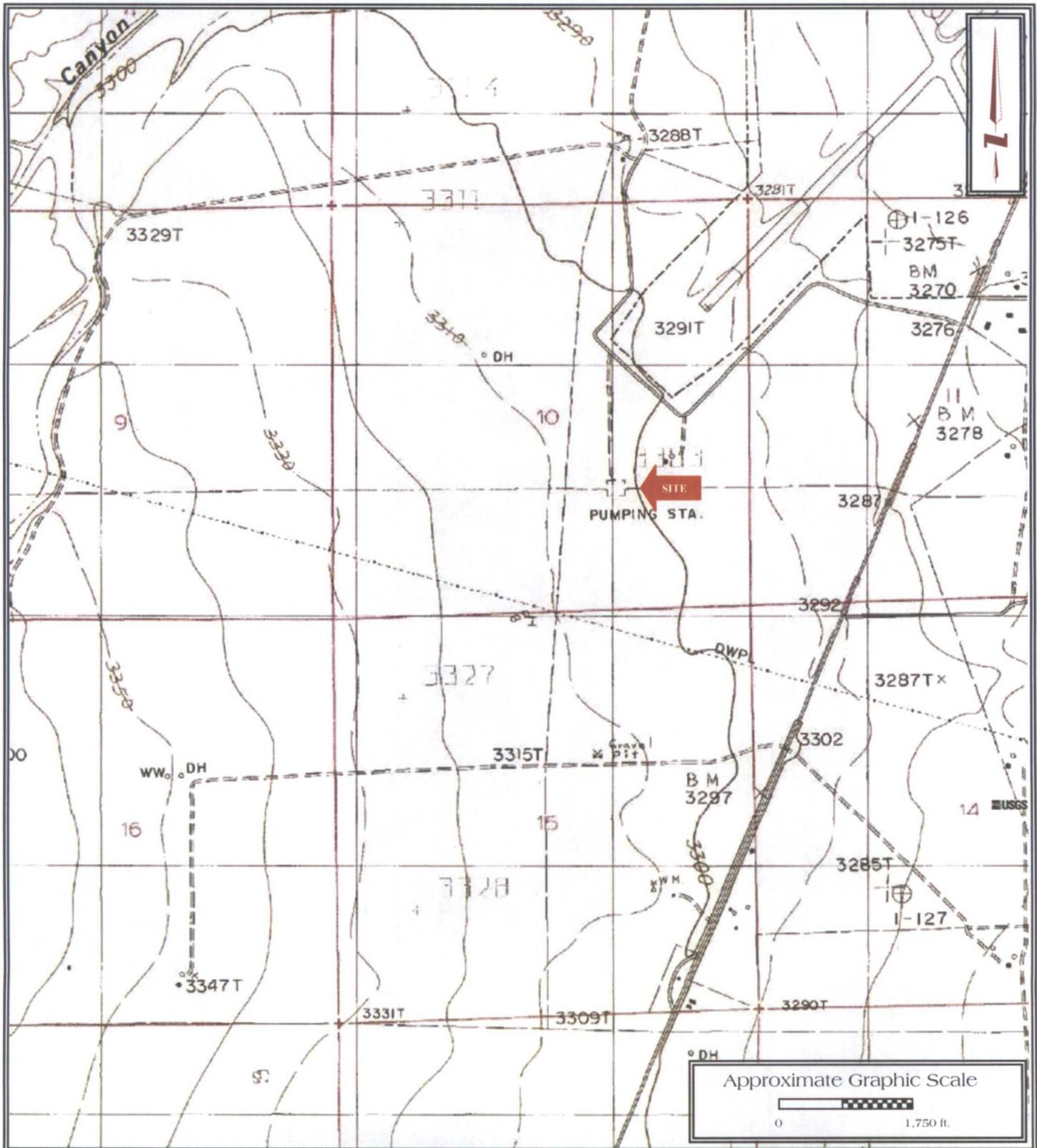

B. Chris Mitchell, P. G.
Principal

Attachments:

- Attachment A - Figures
- Attachment B - Tables
- Attachment C - Form C-137 EZ
- Attachment D - Photographic Documentation

ATTACHMENT A

Figures



Corrective Action Report
 Trunk A Separator
 NW ¼ of SE ¼ in S10, T23S, R26E
 Carlsbad, Eddy Co., Texas

SWG Project No. 0210002

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FIGURE 1
 Topographic Map
 Kitchen Cove, NM Quadrangle
 Contour Interval - 10 Feet
 1985

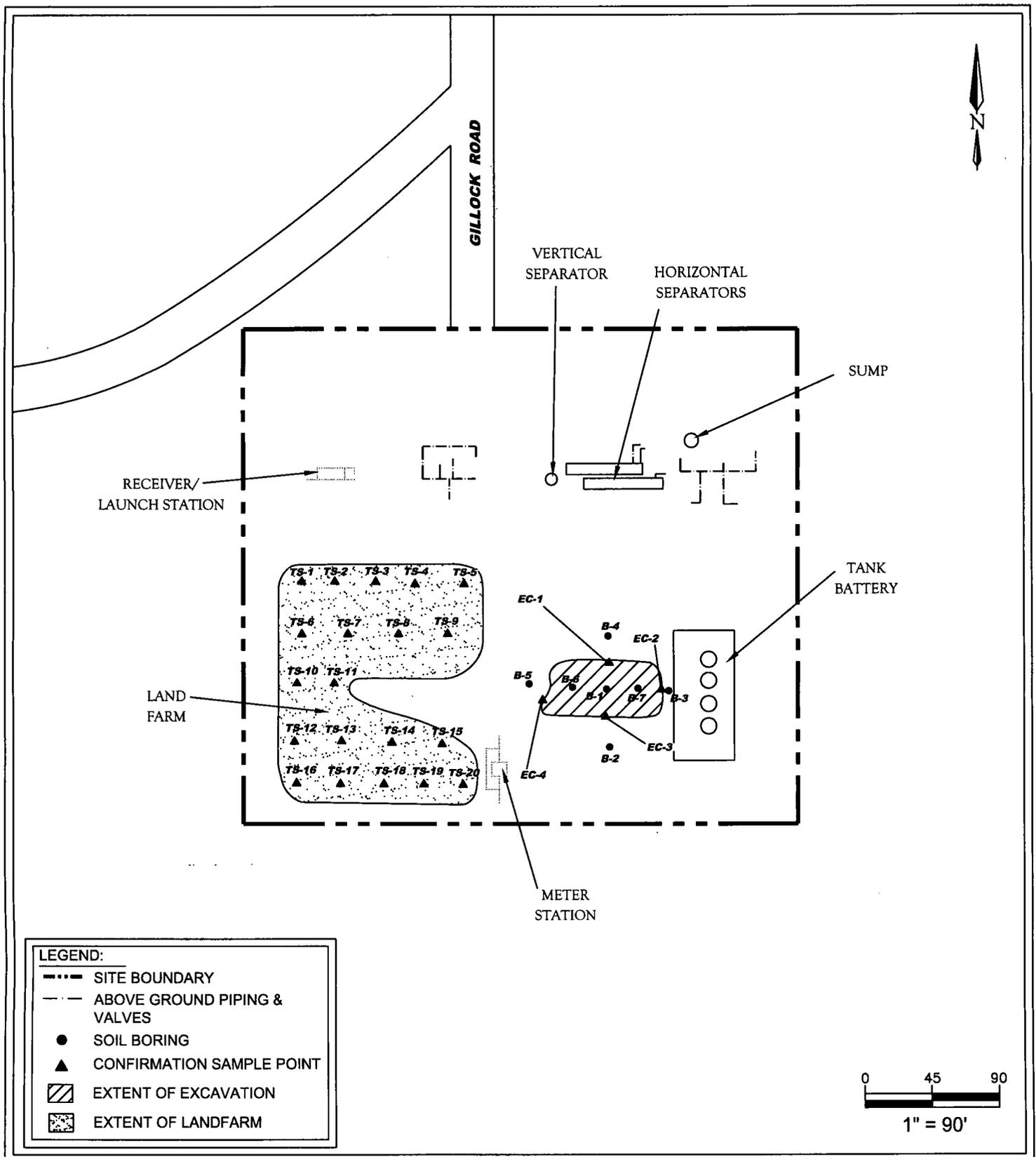


Corrective Action Report
Trunk A Separator
NW ¼ of SE ¼ in S10, T23S, R26E
Carlsbad, Eddy Co., Texas

SWG Project No. 0210002

Southwest
GEOSCIENCE

FIGURE 2
Site Vicinity Map
2009 Aerial Photograph
Google

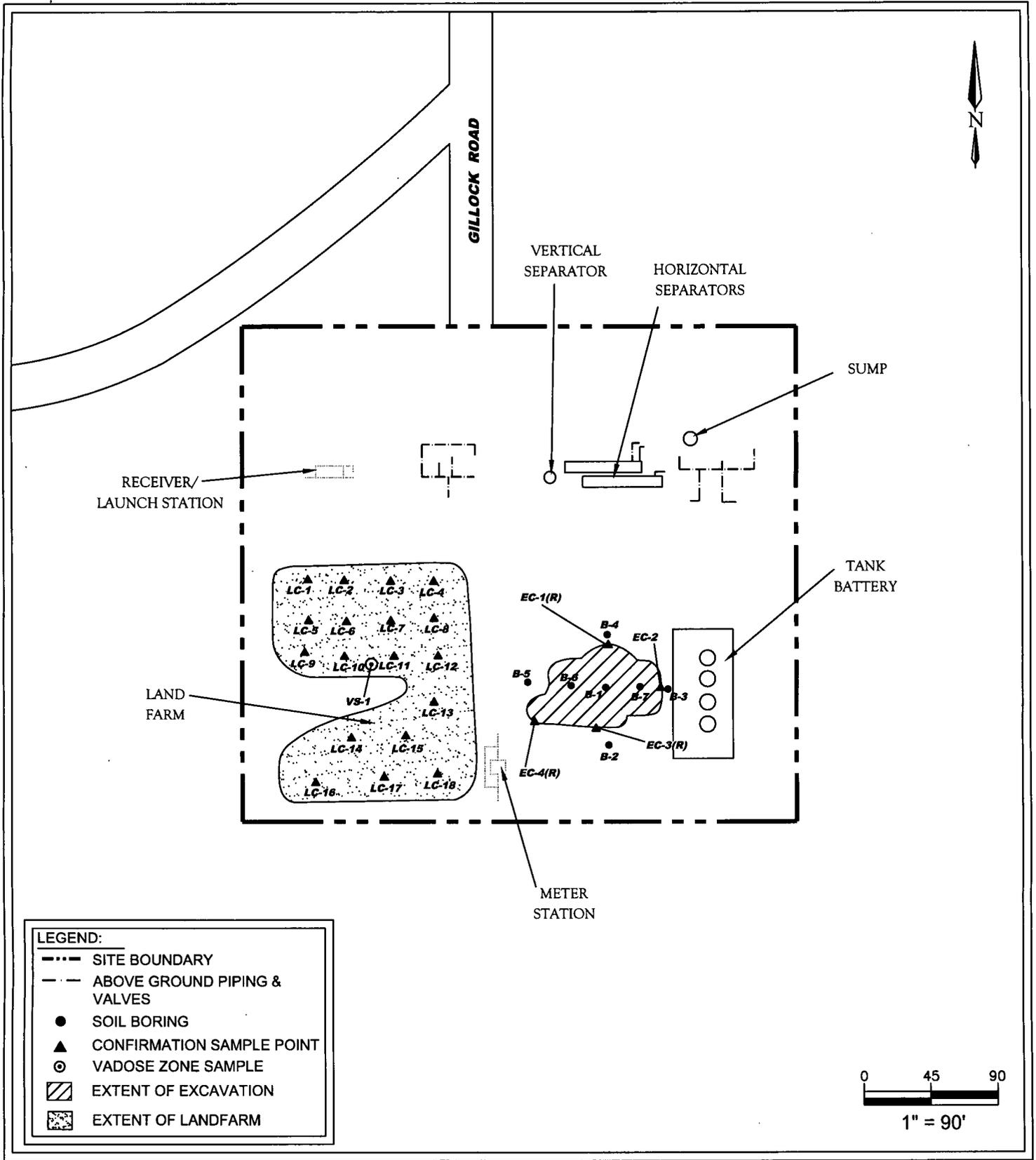


Corrective Action Report
 Trunk A Separator
 NW 1/4 of SE 1/4 in S10, T235, R26E
 Carlsbad, Eddy County, New Mexico

SWG Project No. 0210002

Southwest
 GEOSCIENCE

FIGURE 3A
 SITE MAP



Corrective Action Report
 Trunk A Separator
 NW 1/4 of SE 1/4 in S10, T235, R26E
 Carlsbad, Eddy County, New Mexico

SWG Project No. 0210002



FIGURE 3B
 SITE MAP

ATTACHMENT B

Tables

TABLE 1
Trunk A Separator
SOIL ANALYTICAL RESULTS - SOIL BORING and EXCAVATION CONFIRMATION SAMPLES

Sample I.D.	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
New Mexico Oil Conservation Division Remediation Action Levels			NE	10	NE	NE	NE	50	5,000	
API Site-Specific TPH Risk Based Screening Level in Residential Soil			NE	NE	NE	NE	NE	NE	7,000	
B-1	11/5/2009	13 to 14	NA	0.063 (j)	6	0.21	35	41	250	1,600
	11/5/2009	56 to 57	NA	3.2	35	12	230	280	2,100	4,000
	11/5/2009	99 to 100	NA	<0.0017	<0.0018	<0.0019	0.011 (j)	0.011 (j)	0.32	70
B-2	8/10/2010	48 to 50	NA	<0.0011	<0.0011	<0.0011	<0.0033	<0.0066	<0.0549	7.38
B-3	8/10/2010	88 to 90	NA	<0.00116	<0.00116	<0.00116	<0.00349	<0.00829	<0.0581	8.72
B-4	8/11/2010	96 to 98	NA	<0.00125	<0.00125	<0.00125	<0.00375	<0.0075	<0.0625	4.51
B-5	8/11/2010	48 to 50	NA	<0.00123	<0.00123	<0.00123	<0.0037	<0.00739	<0.0617	33.6
B-6	8/11/2010	42 to 44	NA	<0.00122	0.00988	0.0106	0.133	0.15348	0.694	180
B-7	8/12/2010	48 to 50	NA	<0.00119	0.0259	0.00918	0.376	0.41108	2.54	139
EC-1	1/31/2011	8 to 9	NA	<0.00105	0.517	0.112	54.8	55.43005	1,230	2,430
EC-1(R)	4/29/2011	8 to 9	NA	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	40
EC-2	1/31/2011	8 to 9	NA	<0.00105	<0.00105	<0.00105	<0.00314	<0.00629	0.166	<3.02
EC-3	1/31/2011	8 to 9	NA	<0.00108	2.86	3.49	74.2	80.558	1,190	2,270
EC-3(R)	4/29/2011	8 to 9	NA	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	36
EC-4	1/31/2011	8 to 9	NA	<0.00109	0.379	1.25	55.8	57.43009	1,380	10,200
EC-4(R)	4/29/2011	8 to 9	NA	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	25

Note: Concentrations in bold and yellow exceed the applicable OGD Remediation Action Levels
 Note: Concentrations in bold and orange exceed the applicable OGD Remediation Action Levels and the site-specific RBSLs
 NA = Not Analyzed
 NE = Not Established

TABLE 2
Trunk A Separator
ANALYTICAL RESULTS - TREATED SOILS

Sample ID.	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
NMAC Small Landfarm Closure Performance Standards			500	0.2	NE	NE	NE	50	500	
NMAC Specific Requirements Applicable to Landfarms with Groundwater >100 ft			1,000	0.2	NE	NE	NE	50	1,000	
TS-1	3/24/2011	0 to 0.5	580	<0.05	<0.05	<0.05	<0.10	<0.25	21	2,100
TS-2	3/24/2011	0 to 0.5	1,200	<0.05	<0.05	<0.05	0.23	0.38	12	2,100
TS-3	3/24/2011	0 to 0.5	1,700	<0.05	<0.05	<0.05	0.18	0.33	8.2	2,300
TS-4	3/24/2011	0 to 0.5	1,500	<0.05	<0.05	<0.05	0.43	0.58	10	1,100
TS-5	3/24/2011	0 to 0.5	1,200	<0.05	<0.05	<0.05	0.11	0.26	11	1,200
TS-6	3/24/2011	0 to 0.5	1,700	<0.05	<0.05	<0.05	<0.10	<0.25	6.5	1,800
TS-7	3/24/2011	0 to 0.5	1,700	<0.25	<0.25	<0.25	<0.50	<1.25	<25	2,300
TS-8	3/24/2011	0 to 0.5	1,200	<0.25	<0.25	<0.25	<0.50	<1.25	<25	1,200
TS-9	3/24/2011	0 to 0.5	990	<0.25	<0.25	<0.25	<0.50	<1.25	<25	960
TS-10	3/24/2011	0 to 0.5	910	<0.25	<0.25	<0.25	0.75	1.5	28	2,000
TS-11	3/24/2011	0 to 0.5	530	<0.25	<0.25	<0.25	<0.50	<1.25	<25	260
TS-12	3/24/2011	0 to 0.5	680	<0.25	<0.25	<0.25	<0.50	<1.25	<25	950
TS-13	3/24/2011	0 to 0.5	1,000	<0.25	<0.25	<0.25	<0.50	<1.25	<25	1,600
TS-14	3/24/2011	0 to 0.5	270	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10
TS-15	3/24/2011	0 to 0.5	1,600	<0.25	<0.25	<0.25	<0.50	<1.25	<25	2,100
TS-16	3/24/2011	0 to 0.5	1,500	<0.25	<0.25	<0.25	<0.50	<1.25	<25	1,600
TS-17	3/24/2011	0 to 0.5	88	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10
TS-18	3/24/2011	0 to 0.5	110	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10
TS-19	3/24/2011	0 to 0.5	90	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10
TS-20	3/24/2011	0 to 0.5	33	<0.05	<0.05	<0.05	<0.10	<0.25	<5.0	<10

Note: Concentrations in bold and yellow exceed the NMAC Small Landfarm Closure Performance Standards

Note: Concentrations in bold and orange exceed the NMAC Small Landfarm Closure Performance Standards and the OGD Remediation Action Levels

NE = Not Established

TABLE 3
Trunk A Separator
ANALYTICAL RESULTS - TREATED SOILS

Sample ID	Date	Sample Depth (feet)	Chlorides (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)
NMAC Small Landfill Closure Performance Standards			500	0.2	NE	NE	NE	50	500	
LC-1	6/21/2011	0 to 0.5	55	NA	NA	NA	NA	NA	<1.6	16
LC-2	6/21/2011	0 to 0.5	190	NA	NA	NA	NA	NA	<8.0	82
LC-3	6/21/2011	0 to 0.5	390	NA	NA	NA	NA	NA	<16	66
LC-4	6/21/2011	0 to 0.5	270	NA	NA	NA	NA	NA	<16	57
LC-5	6/21/2011	0 to 0.5	130	NA	NA	NA	NA	NA	<16	260
LC-6	6/21/2011	0 to 0.5	190	NA	NA	NA	NA	NA	23 (j)	59
LC-7	6/21/2011	0 to 0.5	570	NA	NA	NA	NA	NA	90 (j)	480
LC-7(R)	8/24/2011	0 to 0.5	1,100	NA	NA	NA	NA	NA	NA	NA
LC-7(R2)	11/3/2011	0 to 0.5	100	NA	NA	NA	NA	NA	<9.6	450
LC-8	6/21/2011	0 to 0.5	220	NA	NA	NA	NA	NA	<8.0	110
LC-9	6/21/2011	0 to 0.5	120	NA	NA	NA	NA	NA	<8.0	71
LC-10	6/21/2011	0 to 0.5	280	NA	NA	NA	NA	NA	<1.6	19
LC-11	6/21/2011	0 to 0.5	630	NA	NA	NA	NA	NA	<32	910
LC-11(R)	8/24/2011	0 to 0.5	960	NA	NA	NA	NA	NA	7.9	670
LC-11(R2)	11/3/2011	0 to 0.5	3,300	NA	NA	NA	NA	NA	<4.9	110
LC-11(R3)	12/6/2011	0 to 0.5	830	NA	NA	NA	NA	NA	NA	NA
LC-12	6/21/2011	0 to 0.5	140	NA	NA	NA	NA	NA	<16	290
LC-13	6/21/2011	0 to 0.5	570	NA	NA	NA	NA	NA	<32	980
LC-13(R)	8/24/2011	0 to 0.5	54	NA	NA	NA	NA	NA	3.4 (j)	54
LC-14	6/21/2011	0 to 0.5	140	NA	NA	NA	NA	NA	<8.0	140
LC-15	6/21/2011	0 to 0.5	120	NA	NA	NA	NA	NA	12 (j)	81
LC-16	6/21/2011	0 to 0.5	470	NA	NA	NA	NA	NA	27 (j)	460
LC-17	6/21/2011	0 to 0.5	580	NA	NA	NA	NA	NA	<8.0	170
LC-17(R)	8/24/2011	0 to 0.5	900	NA	NA	NA	NA	NA	NA	NA
LC-17(R2)	11/3/2011	0 to 0.5	38	NA	NA	NA	NA	NA	<4.7	46
LC-18	6/21/2011	0 to 0.5	320	NA	NA	NA	NA	NA	<8.0	1,300
LC-18(R)	8/24/2011	0 to 0.5	NA	NA	NA	NA	NA	NA	<7.8	630
LC-18(R2)	11/3/2011	0 to 0.5	270	NA	NA	NA	NA	NA	<4.7	83
VS-1	8/24/2011	0 to 0.5	140	0.005 (j)	<0.0045	<0.0044	<0.015	<0.0289	<4.7	83

Note: Concentrations in bold and yellow exceed the applicable NMAC Small Landfill Closure Performance Standards
 PA = Previously Analyzed and below the NMAC Small Landfill Closure Performance Standards
 NA = Not Analyzed
 NE = Not Established

ATTACHMENT C

C-137 EZ Form

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

For State Use Only:
Registration #

Form C-137 EZ
Revised August 1, 2011

Submit 1 Copy to Santa Fe Office

REGISTRATION/ FINAL CLOSURE REPORT FOR SMALL LANDFARM

Section 7 of 19.15.36 NMAC defines a small landfarm as a centralized landfarm of two acres or less that has a total capacity of 2000 cubic yards or less in a single lift of eight inches or less, remains active for a maximum of three years from the date of its registration and that receives only petroleum hydrocarbon-contaminated soils (excluding drill cuttings) that are exempt or non-hazardous waste. The operator shall operate only one active small landfarm per governmental section at any time.

GENERAL INFORMATION

1. Small Landfarm Registration Small Landfarm Final Closure Report*
(*Must be submitted within three years from the registration date)
2. Operator: Enterprise Products Operating
Address: P.O. Box 4324, Houston, Texas 77210
Contact Person: Mr. Rodney Sartor Phone: (713) 381-6629
3. Location: NW /4 SE /4 Section 10 Township 23S Range 26E

REGISTRATION

1. As operator, are you the surface estate owner of the proposed site? Yes No If no, please attach a certification statement that demonstrates a written agreement is established with the surface estate owner authorizing the use of the site for the proposed small landfarm.
2. Will the proposed small landfarm comply with the siting requirements of Subsections A and B of 19.15.36.13 NMAC?
 Yes No
- A. Depth to ground water.
- No small landfarm shall be located where ground water is less than 50 feet below the lowest elevation at which the operator will place oil field waste.
- B. No surface waste management facility shall be located:
- within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - within an existing wellhead protection area or 100-year floodplain;
 - within, or within 500 feet of, a wetland;
 - within the area overlying a subsurface mine;
 - within 500 feet from the nearest permanent residence, school, hospital, institution or church in existence at the time of initial application; or
 - within an unstable area, unless the operator demonstrates that engineering measures have been incorporated into the surface waste management facility design to ensure that the surface waste management facility's integrity will not be compromised.
3. Attach a plat and topographic map showing the small landfarm's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the small landfarm site; watercourses; fresh water sources, including wells and springs; oil and gas wells or other production facilities; and inhabited buildings within one mile of the site's perimeter.
- Based on the information provided with this submittal, registration of a small landfarm can only be granted if the operator complies with the following understandings and conditions:
- The operator shall operate only one active small landfarm per governmental section at any time. No small landfarm shall be located more than one mile from the operator's nearest oil or gas well or other production facility.
 - The operator shall accept only exempt or non-hazardous wastes consisting of soils (excluding drill cuttings) generated as a result of accidental releases from production operations, that are predominantly contaminated by petroleum hydrocarbons, do not contain free liquids, would pass the paint filter test and where testing shows chloride concentrations are 500 mg/kg or below.
 - The operator shall berm the landfarm to prevent rainwater run-on and run-off.
 - The operator shall post a sign at the site readable from a distance of 50 feet and listing the operator's name; small landfarm registration number; location by unit letter, section, township and range; expiration date; and an emergency contact telephone number.
 - The operator shall spread and disk contaminated soils in a single eight inch or less lift within 72 hours of receipt. The operator shall conduct treatment zone monitoring to ensure that the TPH concentration, as determined by EPA SW-846 method 8015M or EPA method 418.1 or other EPA method approved by the division, does not exceed 2500 mg/kg; and that the chloride

concentration, as determined by EPA method 300.1, does not exceed 500 mg/kg. The operator shall treat soils by disking at least once a month and by watering and adding bioremediation enhancing materials when needed.

- The operator shall maintain records reflecting the generator, the location of origin, the volume and type of oil field waste, the date of acceptance and the hauling company for each load of oil field waste received. The division shall post on its website each small landfarm's location, operator and registration date. In addition, the operator shall maintain records of the small landfarm's remediation activities in a form readily accessible for division inspection. The operator shall maintain all records for five years following the small landfarm's closure.

- The operator shall submit a final closure report on a form C-137 EZ, together with photographs of the closed site, to the environmental bureau in the division's Santa Fe office.

CERTIFICATION

I hereby certify that the information submitted with this registration is true, accurate and complete to the best of my knowledge and belief and agree to the understandings and conditions of this registration.

Name: _____ Title: _____
Signature: _____ Date: _____
E-mail Address: _____

OCD REGISTRATION: Approved. Date: _____ Denied. Date: _____

Comments: _____

OCD Representative Signature: _____

Title: _____ OCD Registration Number: _____

FINAL CLOSURE REPORT

Were the landfarmed soils able to achieve the closure performance standards, listed below, within three years from the registration date? Yes No (Please provide laboratory analytical results)

- benzene, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 0.2 mg/kg;
- Total BTEX, as determined by EPA SW-846 method 8021 B or 8260B, shall not exceed 50 mg/kg;
- TPH, as determined by EPA SW-846 method 418.1 or other EPA method approved by the division, shall not exceed 2500 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, shall not exceed 500 mg/kg; and
- chlorides, as determined by EPA method 300.1, shall not exceed 500 mg/kg.

If yes, were the additional closure requirements listed below satisfied? Yes No (Please provide photos)

- The operator shall re-vegetate soils remediated to the closure performance standards if left in place in accordance with Paragraph (6) of Subsection A of 19.15.36.18 NMAC.
- If the operator returns remediated soils to the original site, or with division permission, recycles them, re-vegetate the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC;
- The operator shall remove berms on the small landfarm and buildings, fences, roads and equipment; and
- The operator shall clean up the site and collect one vadose zone soil sample from three to five feet below the middle of the treatment zone, or in an area where liquids may have collected due to rainfall events; the vadose zone soil sample shall be collected and analyzed using the methods specified above for TPH, BTEX and chlorides.

If no, were the landfarmed soils that have not or cannot be remediated to the closure performance standards within three years removed to a division-approved surface waste management facility, and the cell filled in with native soil to the standards in Paragraph (6) of Subsection A of 19.15.36.18 NMAC and re-vegetated? Yes No (Please provide photos)

CERTIFICATION

I hereby certify that the information submitted with this final closure report is true, accurate and complete to the best of my knowledge and belief.

Name: Rodney M. Sartor Title: Remediation Manager
Signature: _____ Date: 10/16/2012
E-mail Address: RMSartor@eprod.com

OCD CLOSURE REVIEW: Closure Approved. Date: 10/24/2012 Closure Denied. Date: _____

Comments: _____

OCD Representative Signature: _____ Santa Fe

Title: Environmental Engineer OCD Registration Number: _____

ATTACHMENT D

Photographic Documentation



1.) View of drilling activities during supplementary site investigation.



2.) View soil bore plugging activities subsequent to supplementary site investigation.



3.) View of excavation subsequent to initial corrective action activities, looking east.



4.) View of excavation subsequent to initial corrective action activities, looking west.



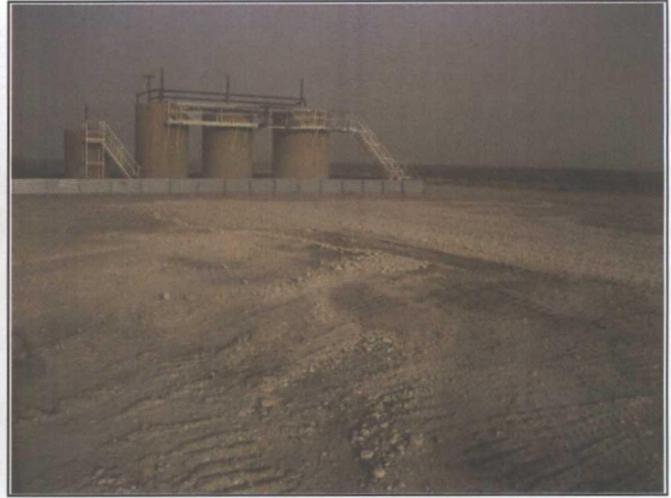
5.) View of landfarm treatment cell and treatment activities subsequent to initial corrective action activities, looking southwest.



6.) View of plastic liner within on-site excavation prior to backfill activities, looking west.



7.) View of treated soils used for partial excavation backfill, approximately 100 cubic yards total, looking east.



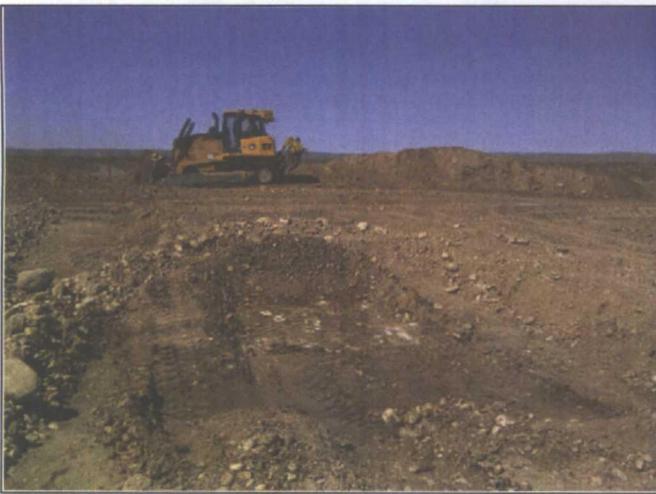
8.) View of former excavation footprint subsequent to backfill activities, looking southeast.



9.) View of treatment cell subsequent to re-tilling of soils in April of 2011, looking east.



10.) View of treatment cell re-watering activities in May of 2011, looking southwest.



11.) View of treated soil stockpiling on the southwest portion of the Site in March 2012, looking west.



12.) View of former on-site landfarm treatment cell with stockpiled soils on the southwest portion of the Site, looking southwest.