

**RECEIVED**

*By OCD; Dr. Oberding at 8:52 am, Nov 16, 2015*



Tasman Geosciences

November 13, 2015

Dr. Tomáš Oberding  
Hydrologist, Adv-District 1  
Oil Conservation Division, EMNRD  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

**RE: No Further Action Site Closure Request  
X-Line Pipeline Release  
1RP-400-0**

**APPROVED**

*By OCD; Dr. Oberding at 10:56 am, Nov 16, 2015*

Dear Mr. Oberding:

Tasman Geosciences (Tasman) has prepared this No Further Action (NFA) Site Closure Request Letter (NFA Letter) on behalf of DCP Midstream, LP (DCP) for the X-Line Pipeline Release (Site) located on the Etcheverry Ranch in Lea County, New Mexico (Figure 1). A brief description of Site activities justifying this NFA Letter as well as anticipated site closure activities are provided below.

### **X-Line Site Background**

Natural gas gathering operations conducted on the Etcheverry Ranch resulted in a historic release of natural gas fluids on the property in 2001. Remediation of the release at the X-Line Site has been conducted subsequent to that time under the guidance of the New Mexico Oil Conservation Division (NMOCD). A Settlement and Access Agreement was entered into on April 21, 2003 between Duke Energy Field Services (now DCP Midstream [DCP]) and the property landowner.

Remediation efforts were conducted at the X-Line Site in order to remove the presence of benzene, toluene, ethylbenzene, and xylene (BTEX) constituents in soil and groundwater. Remediation activities included the following:

- Soil excavation, which resulted in the removal and disposal of approximately 6,746 cubic yards of impacted soil in January through March 2002.
- Light Non-Aqueous Phase Liquid (LNAPL) recovery during July 2003 through July 2004.
- Air Sparge / Soil Vapor Extraction (AS/SVE) remediation was conducted from June 2003 through the second quarter of 2012. Figure 2 illustrates the location of the AS/SVE remediation system.

The remediation efforts above were detailed within regular groundwater monitoring and remediation reports submitted to the NMOCD. In addition, quarterly groundwater sample

collection was conducted at monitoring wells MW-1 through MW-8 (Figure 2) between April 2002 and July 2014 to monitor the remediation efforts.

Based on the groundwater sampling activities described above, BTEX constituents have been below their respective NMOCD regulatory goals since June 2012, representing nine (9) quarters of analytical results below NMOCD regulatory standards (Table 1). The passage of a minimum 8 quarters of groundwater data complies with the NMOCD threshold to pursue a NFA Determination associated with the project. Please refer to the Second Quarter 2014 Groundwater Monitoring and Summary Report (August 4, 2014) for historic groundwater analytical results.

### **Site Closure Activities**

Site closure activities shall be conducted within a reasonable period of time following approval of this NFA Letter from the NMOCD or other written communication regarding acceptance of the proposed closure from the regulatory agency. Anticipated Site closure activities include removal of all surface remediation equipment and appurtenances relating to Site remediation and monitoring activities which includes a total of eight (8) groundwater monitoring wells, 14 AS remediation wells, and 8 SVE remediation wells as illustrated on Figure 2. Each well will be plugged and abandoned in accordance with applicable State standards and requirements.

Site restoration activities will be conducted in accordance with the 2003 Settlement and Access Agreement executed between the landowner and DCP.

Should you have any questions regarding this NFA Letter and the activities discussed herein, please contact me by phone at (303) 487-1228 or by e-mail at [bhumphrey@tasman-geo.com](mailto:bhumphrey@tasman-geo.com).

Sincerely,



Brian Humphrey  
Project Manager  
Tasman Geosciences  
6899 Pecos St., Unit C  
Denver, CO 80221

### **Enclosures:**

Table 1 – Summary of BTEX Concentrations in Groundwater

Figure 1 – Site Location Map

Figure 2 – Site Layout Overview Map

cc:

Steve Weathers – DCP Midstream, LP  
file

## **TABLES**

**TABLE 1**  
**SUMMARY OF BTEX CONCENTRATIONS IN GROUNDWATER**  
**X-LINE PIPELINE RELEASE - ETCHEVERRY RANCH**  
**LEA COUNTY, NEW MEXICO**

Location Identification	Sample Date	Benzene (mg/l)	Toluene (mg/l)	Ethylbenzene (mg/l)	Total Xylenes (mg/l)	Comments
New Mexico Water Quality Control Commission Groundwater Standards (mg/L)		0.01	0.75	0.75	0.62	
MW-1	6/8/2012	<0.001	<0.002	<0.002	<0.003	Duplicate sample collected
MW-1	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-1	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-1	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-1	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-1	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-1	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-1	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-1	7/14/2014	<0.001	<0.002	<0.002	<0.003	
MW-2	6/8/2012	<0.001	<0.002	0.00067	0.0056	
MW-2	9/10/2012	<0.001	<0.002	0.0089	0.0721	
MW-2	12/7/2012	<0.001	<0.002	0.0079	0.0665	
MW-2	2/20/2013	<0.001	<0.002	0.0045	0.0364	
MW-2	6/2/2013	<0.001	<0.002	0.0108	0.0856	
MW-2	9/9/2013	<0.001	<0.002	0.0036	0.0213	
MW-2	12/2/2013	<0.001	<0.002	0.0048	0.0119	
MW-2	2/28/2014	<0.001	<0.002	0.0054	0.0245	
MW-2	7/14/2014	<0.001	<0.002	0.0059	0.0176	
MW-3	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-3	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-3	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-3	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-3	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-3	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-3	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-3	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-3	7/14/2014	<0.001	<0.002	<0.002	<0.003	
MW-4	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-4	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-4	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-4	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-4	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-4	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-4	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-4	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-4	7/14/2014	<0.001	<0.002	<0.002	<0.003	
MW-5	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-5	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-5	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-5	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-5	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-5	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-5	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-5	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-5	7/14/2014	<0.001	<0.002	<0.002	<0.003	

**TABLE 1**  
**SUMMARY OF BTEX CONCENTRATIONS IN GROUNDWATER**  
**X-LINE PIPELINE RELEASE - ETCHEVERRY RANCH**  
**LEA COUNTY, NEW MEXICO**

Location Identification	Sample Date	Benzene (mg/l)	Toluene (mg/l)	Ethylbenzene (mg/l)	Total Xylenes (mg/l)	Comments
New Mexico Water Quality Control Commission Groundwater Standards (mg/L)		0.01	0.75	0.75	0.62	
MW-6	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-6	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-6	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-6	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-6	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-6	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-6	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-6	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-6	7/14/2014	<0.001	<0.002	<0.002	<0.003	
MW-7	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-7	9/10/2012	<0.001	<0.002	<0.002	<0.003	
MW-7	12/7/2012	<0.001	<0.002	<0.002	<0.003	
MW-7	2/20/2013	<0.001	<0.002	<0.002	<0.003	
MW-7	6/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-7	9/9/2013	<0.001	<0.002	<0.002	<0.003	
MW-7	12/2/2013	<0.001	<0.002	<0.002	<0.003	
MW-7	2/28/2014	<0.001	<0.002	<0.002	<0.003	
MW-7	7/14/2014	<0.001	<0.002	<0.002	<0.003	
MW-8	6/8/2012	<0.001	<0.002	<0.002	<0.003	
MW-8	9/10/2012	0.00086	<0.002	0.00066	0.002	Duplicate Sample Collected
MW-8	12/7/2012	0.00063	<0.002	0.00086	<0.003	Duplicate Sample Collected
MW-8	2/20/2013	0.00045	<0.002	0.0019	0.0022	Duplicate Sample Collected
MW-8	6/2/2013	0.00043	<0.002	0.00098	0.0037	Duplicate Sample Collected
MW-8	9/9/2013	0.00044	<0.002	<0.002	<0.003	Duplicate Sample Collected
MW-8	12/2/2013	0.00044	<0.002	<0.002	0.0028	Duplicate Sample Collected
MW-8	2/28/2014	0.00042 J	<0.002	0.00036 J	0.0034	Duplicate Sample Collected
MW-8 (Duplicate)	2/28/2014	0.00045 J	<0.002	0.00026 J	0.0028 J	
MW-8	7/14/2014	0.00051 J	<0.002	0.001 J	0.003	Duplicate Sample Collected
MW-8 (Duplicate)	7/14/2014	0.00053 J	<0.002	0.00097 J	0.003	

Notes:

The environmental cleanup standards for water that are applicable to this Site are the New Mexico Water Quality Control Commission (NMWQCC) Groundwater Standards.

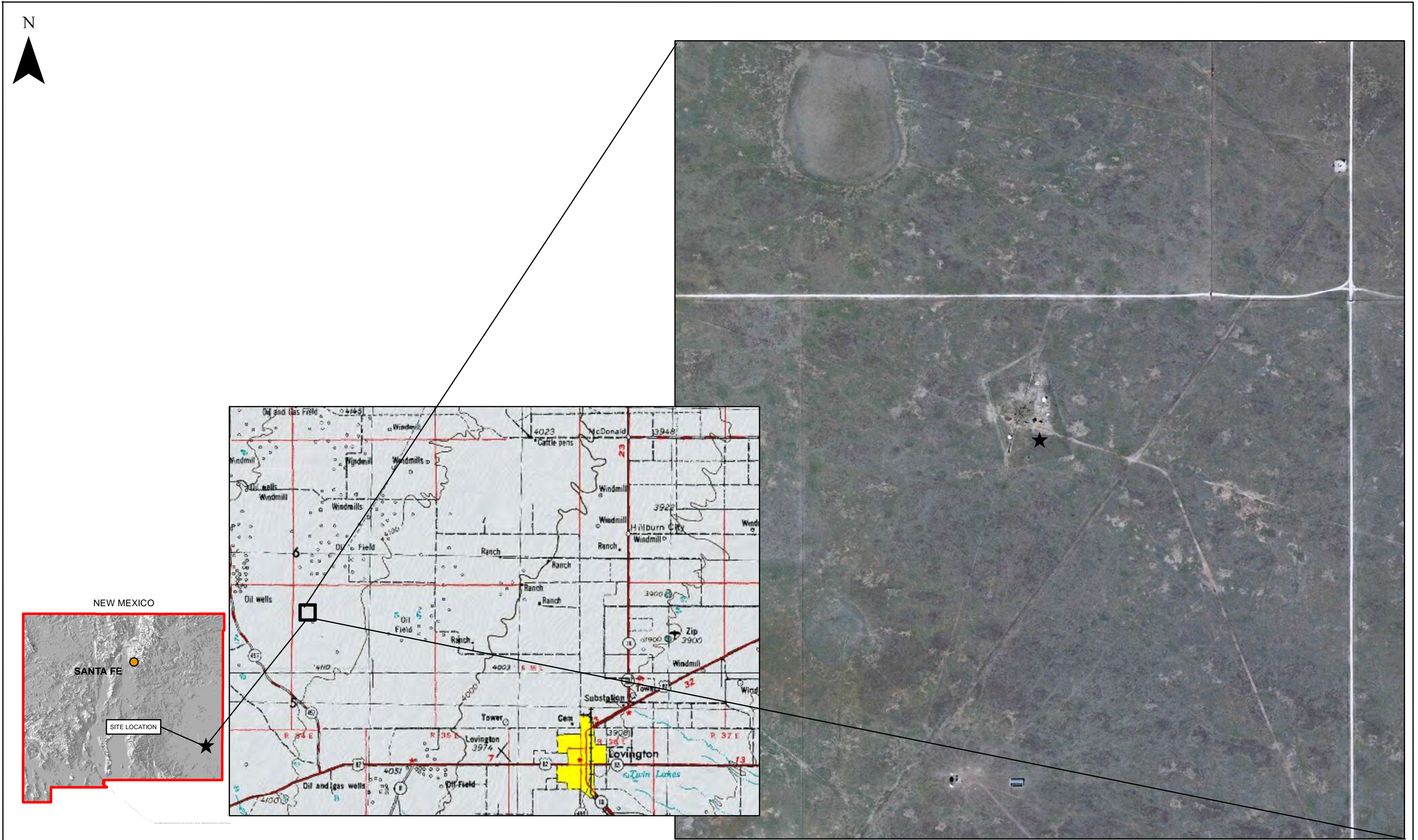
Sample locations are shown on Figure 2.

mg/L = milligrams per liter.

J = Indicates an estimated value

## FIGURES





DATE:	April 2014
DESIGNED BY:	T. Johansen
DRAWN BY:	D. Arnold



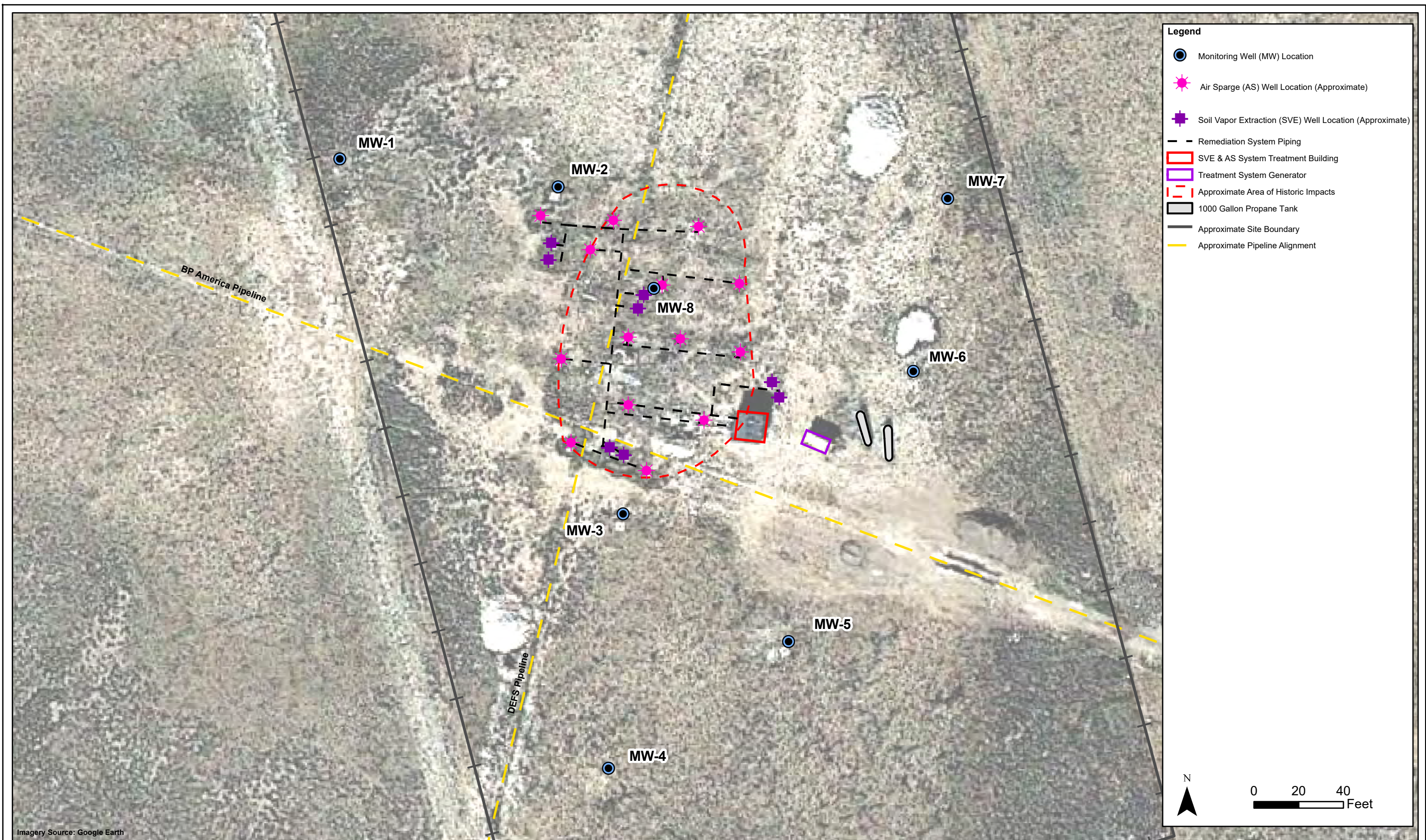
Tasman Geosciences, LLC  
6899 Pecos Street - Unit C  
Denver, CO 80221

**DCP Midstream**  
**X-Line Pipeline Release**  
Unit B, Section 7, Township 15 South, Range 34 East  
Lea County, New Mexico

Site Location  
Map

Figure  
1





DATE:	March 2015
DESIGNED BY:	T. Johansen
DRAWN BY:	D. Arnold



Tasman Geosciences, Inc.  
6899 Pecos Street - Unit C  
Denver, CO 80221

**DCP Midstream  
X-Line Pipeline Release**  
Unit B, Section 7, Township 15 South, Range 34 East  
Lea County, New Mexico

Site Layout  
Overview Map

Figure  
2