

From: Joel Lowry <jwlowry@basinenv.com>
Sent: Wednesday, July 10, 2013 9:28 AM
To: Leking, Geoffrey R, EMNRD
Subject: SUG's Drip Tank #111 -- Permission to Line & Backfill
Attachments: DT_111_Soil_Chemistry_Table.pdf; DT_111_Site_Sample_Map.pdf; DT_111_Photos.pdf

JUL 10 2013

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approved per 20 mil liner @ 12' & backfill w/ clean
Geoffrey Leking
Environmental Specialist
NMOCD-DIST 6 7/10/13

Mr. Leking,

This email has been prepared in regard to Southern Union Gas Services' Drip Tank #111 Historical Remediation Site. The legal description of the release site is Unit Letter "E", Section 27, Township 22 South, Range 36 East, in Lea County, New Mexico. The property affected by the release is owned by Mathew Casey. The release site GPS coordinates are 32° 21.904' North and 103° 15.517' West. An NMOCD Representative indicated that the depth to groundwater is approximately 200' bgs on the initial Form C-144.

The Form C-144, dated March 19, 2008, indicated there was a 100 bbl steel below grade tank in need of removal. On or around March 17, 2008, the BGT was removed from the location. Confirmation soil samples collected from the associated excavation indicated soil had not been impacted above NMOCD Regulatory Standards. Please reference the attached "Soil Chemistry Table". During the removal of the on-site BGT, a "historical pit" was discovered in the area.

On April 29, 2013, (3) soil bores were advanced in the area defined by the "historical pit" in an effort to determine the vertical extent of soil impact. During the advancement of the soil bores, soil samples were collected on 10' drilling intervals and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Each of the submitted soil samples exhibited BTEX, TPH and chloride concentrations less than NMOCD Regulatory Standards with the exception of SB-3 @ 10' which had a TPH concentration of 8,590 ppm and a chloride concentration of 267 ppm.

On July 20, 2013, Basin began excavation activities in the area defined by the "historical pit". The excavation floor was advanced to approximately 12' bgs; excavation sidewalls were advanced until field tests suggested concentrations of BTEX, TPH and chloride were less than NMOCD Regulatory Standards. Two (2) confirmation soil samples were collected from each of the excavation sidewalls and submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated concentrations of BTEX, TPH and chloride were less than NMOCD Regulatory Standards in each of the submitted confirmation sidewall soil samples. Please reference the attached "Site and Sample Location Map".

On July 1, 2013, (4) 5-point composite soil samples (Stockpile #1, Stockpile #2, Stockpile #3 and Stockpile #4) were collected from the on-site material and submitted to the laboratory for analysis. Laboratory analytical results indicated concentrations of TPH and chloride were less than NMOCD Regulatory Standards. Results of BTEX analysis will be forwarded to you upon their receipt.

On July 3, 2013, (1) soil sample (Center Floor) was collected from what was believed to be the most heavily impacted spot within the excavation floor. The collected soil sample was submitted to the laboratory for analysis of BTEX, TPH and chloride concentrations. Laboratory analytical results indicated the TPH concentration was 6,280 ppm and the chloride concentration was 142 ppm. Results for BTEX analysis are still pending and will be forwarded to you upon their receipt. Based on laboratory analytical results from soil sample Center Floor, it was determined that a "Risky-Based" approach should be sought. The final dimensions of the excavation were approximately 65' in length, 60' in width and 12' in depth.

With your permission, Basin would like to install a 20-Mil poly liner in the floor of the excavation at approximately 12' bgs. A one foot layer of non-impacted pad sand will be installed both above and below the liner to maintain its integrity during backfilling activities. Upon installing the liner, Basin requests permission to backfill the excavation with stockpiled soil characterized by soil samples Stockpile #1, Stockpile #3 and Stockpile #4. Soil characterized by soil sample Stockpile #3 will be hauled to an NMOCD approved disposal facility. Alternatively, Basin is prepared to "spot dig" the floor of the excavation in the areas represented by soil sample Center Floor, SB-1 and TT-1. Upon completing remediation activities, a Soil Closure Report will be prepared, detailing remediation activities and the results of confirmation soil samples. If you have any questions or would like any additional information, please feel free to contact me by phone or email. Thanks Geoff.

Respectfully,

Joel Lowry

NOTE: SB-1 ABOVE IS ACTUALLY SB-3
JRL 7/10/13



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Brett F. Woods, Ph.D.
Acting Cabinet Secretary

Daniel Sanchez
Acting Division Director
Oil Conservation Division



February 20, 2011

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HOBBSOCD

Mr. Daryl W. Gee
Enstor Grama Ridge Storage & Transportation, LLC
% Enstor Operating Company, LLC
20329 State Highway 249, Suite 400
Houston, Texas 77070

**Re: Hydrostatic Test Discharge - Annual Temporary Permission To Discharge
Hydrostatic Test Water
Enstor Grama Ridge Storage & Transportation, LLC
Enstor Operating Company, LLC
HBP-025**

Dear Mr. Gee:

The Oil Conservation Division (OCD) has received Enstor Grama Ridge Storage & Transportation, LLC's (Enstor) request, dated February 17, 2011, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new natural gas pipelines throughout the State of New Mexico. Also, the OCD acknowledges receipt of the filing fee (\$100.00). This temporary permission will not become effective until OCD receives the temporary permission fee of \$150 pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Based on the information provided in the request, the OCD hereby grants annual temporary permission. Hydrostatic test wastewater generated from all hydrostatic tests that Enstor may perform during an approved one-year period with the following conditions:

1. only applies to testing of new pipeline;
2. the volume does not exceed 25,000 gallons per hydrostatic test;
3. water from a public/municipal water supply or other OCD approved sources is used for each test;
4. oral or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event;
5. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
6. no discharge shall occur:
 - a. where ground water is less than 10 feet below ground surface.
 - b. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - c. within an existing wellhead protection area;

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- d. within, or within 500 feet of a wetland; or
 - e. within 500 feet from the nearest permanent residence, school, hospital, institution, or church;
7. best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
 8. the discharge does not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);
 9. Enstor shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 19.15.29 NMAC.
 10. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
 11. an annual report, summarizing all tests of new pipeline with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test (Section/Township/Range or GPS coordinates);
 - b. the date of each test;
 - c. the volume of each discharge; and
 - d. the source and quality of test water (laboratory analysis, if necessary).

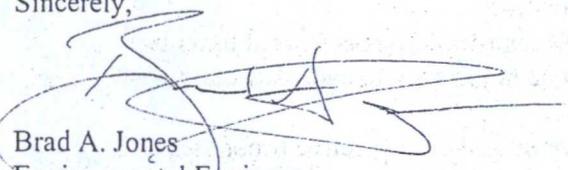
Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire February 19, 2012.** *Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date.* An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of this approval.

This temporary permission will not become effective until OCD receives the temporary permission fee of \$150 pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Please be advised that approval of this request does not relieve Enstor of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve Enstor of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District Offices