GW - <u>340</u>

MONITORING REPORTS

DATE: 2003



MID-AMERICA PIPELINE COMPANY, LLC

OPERATED BY ENTEPRISE NGL PIPELINES, LLC ROCKY MOUNTAIN REGION – ROCK SPRINGS OFFICE MAIL: PO BOX 1788 ROCK SPRINGS, WY 82902-1788 SHIPPING: 2300 FOOTHILL BLVD. (SOUTH BUILDING) PHONE: 307-362-2703 OR 2720 FAX 307-362-2723

ENTERPRISE PRODUCTS COMPANY • ENTERPRISE PRODUCTS OPERATING L.P. • ENTERPRISE PRODUCTS GP, LLC

TELECOPIER TRANSMITTAL SHEET

Date: October 29, 2003

From: Linda Sugano

To: Jack Ford

3462-Fax No: 505-476-**345**1

Subject: Edgewood Release

307-362-2703 ×106

e-mail approval 500 + 10-30-03

Number of Pages (including this sheet): 3

Attached is the letter that we discussed this morning. Enterprise would like to propose an alternative to the clean up approach discussed in my earlier (10-16-03) letter to you. A hard copy will also be sent via regular mail.

I will call you this afternoon to further discuss.

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Thank you very much for your assistance.

Linda Sugano Environmental Engineer 307-362-2703 (ext 106)

The information contained in this FAX is confidential and/or privileged. This FAX is intended to be reviewed initially by the individual named above, only. If the reader of this TRANSMITTAL SHEET is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this FAX or the information contained herein is prohibited. If you have received this FAX in error, please notify the sender immediately by telephone at the number shown under his name above, and return the FAX by mail to the sender at the address shown above. Thank you.

ENTERPRISE PRODUCTS OPERATING, L.P P.O. BOX 1788 ROCK SPRINGS, WY 82902-1788 307-362-2703



October 29, 2003

Jack Ford State of New Mexico Oil Conservation Division 1220 South St. Francis Drive Sante Fe, NM 87505

RE: Edgewood Release

Dear Mr. Ford:

Subsequent to the notification made to your office in our October 16, 2003 correspondence, Enterprise is considering an alternative to the removal of hydrocarbon impacted soils from the Edgewood release site. The new approach involves mechanical aeration of the soil using a soil "shredder".

This approach will effectively remediate the soil similar to land farming processes only in a more accelerated time frame. This method has been selected to alleviate concerns related to heavy truck traffic necessary for hauling the soil off-site and importing new fill. This type of soil aeration has been effectively performed in the remediation of similar soils from well site production pits in New Mexico. This approach involves on-site treatment with no off-site disposal. Remediation effectiveness will be measured by analyzing several grab samples of the treated soil.

Laboratory analyses have been completed on several soil samples collected last week and the composite analytical lab results are attached. In general, the results confirm that the vast majority of contaminated soil (approximately 2000 cubic yards) has been removed. Isolated hot spots remain on the excavation floor, but safety concerns and risk(s) to pipeline integrity limit further soil removal. Given ground water is greater than 300 feet, and the lack of physical transport mechanisms, vertical migration to ground water is improbable. Also, it has been well documented in API and EPA studies as well as other industry documentation that natural degradation of petroleum hydrocarbons will occur in-situ, further mitigating future risk.

The landowner has been briefed on the mechanical aeration and is in general agreement with the action(s) described. The land owner has expressed concern relating to the open excavation, thus your expeditious review and approval of this approach is respectfully requested.

If you have any questions or need further information, please call 307-362-2703 ext. 106 or fax 307-362-2723.

Respectfully,

Linde Sugar

Linda Sugano Environmental Engineer

Attachment

cc: Alvaro Parra, Enterprise Alan Wurtz, Regional Land Manager

Composite Soils Analysis 1/

Floor

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Analysis	Result	Units
Gasoline Range Organics	1833	mg/kg
Benzene	60	mg/kg
Ethylbenzene	6.5	mg/kg
Xylenes	45	mg/kg
Toluene	100	mg/kg

Wall

Analysis	Result	Units		
Gasoline Range Organics	Non Detectable	mg/kg		
Benzene	Non Detectable	mg/kg		
Ethylbenzene	Non Detectable	mg/kg		
Xylenes	Non Detectable	mg/kg		
Toluene	Non Detectable	mg/kg		

1/

Soils samples taken 10-23-03. Analysis conducted by Assaigai Analytical Laboratories, Inc. in Albuquerque, New Mexico.

ENTERPRISE PRODUCTS OPERATING, L.P P.O. BOX 1788 ROCK SPRINGS, WY 82902-1788 307-362-2703



RECEIVED

October 16, 2003

007 2 0 2003

OIL CONSERVATION DIVISION

Mr. Jack Ford State of New Mexico Oil Conservation Division 1220 South St. Francis drive Sante Fe, NM 87505

RE: WRITTEN RELEASE REPORT- Edgewood, NM

Dear Mr. Ford:

Attached please find the OCD Plan form C-141 regarding the recent release on the Mid-America Pipeline Company pipeline near the Edgewood Pump Station. The release occurred as a result of a third party incident involving excavation activity along the 12" liquids line 4.3 miles north of the Edgewood Station. A total of approximately 3900 bbls of demethanized product was released with the vast majority vented or flared. An estimated volume of just over 200 bbls was released to soils in the immediate area.

Enterprise has initiated removal of all affected soil and intends to remove the impacted soil for disposal at a properly permitted facility. Verification samples will be collected to document the area of impact as acceptably clean. Given the depth to groundwater and general land use of the surrounding area, Enterprise has determined that residual hydrocarbon contamination less than 1000 part per million (ppm) total, is protective of human health and the environment. This concentration is supported by New Mexico Oil Conservation Division (OCD) cleanup criteria. Further, BTEX (benzene, toluene, ethylbenzene, and xylene) levels will also be verified to be less than 50 ppm as specified in the OCD guidelines.

Subsequent to verification of residual hydrocarbon concentrations, Enterprise will import clean fill material in order to backfill the excavation. Fill material will be certified "clean" and meet landowner approval. Work at the site shall terminate following backfilling activities and appropriate reclamation.

This written report is provided in addition to the verbal notifications to both the OCD and New Mexico Environment Department on September 25, 2003. Enterprise concludes that further work related to the release is not warranted.

If you have any questions or need to discuss further details, please call me at 307-362-2703 ext. 106.

Respectfully, Linch Sugar

Linda Sugano Environmental Engineer

cc: Alvaro Parra, Houston

Roger Hustead (w/o Form C-141) New Mexico Environment Department P. O. Box 26110 Sante Fe, NM 87502-0110

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division

Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance

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Name of CompanyMid-America Pipeline CompanyAddress PO Box 1788Rock Springs, WY 82902					Contact Lin	da Sugano No. 307-362-27	02 (avt 1	06)			
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