



July 10, 2015

Enterprise Field Services, LLC
PO Box 4324
Houston, TX 77252
Attention: **Ms. Dina Ferguson**

Re: Response/Remediation Plan
1009 Line Leak
Eddy County, New Mexico
Section 23, Township 22 South, Range 30 East
Apex Project No.: 7250715033.001

Dear Ms. Ferguson:

Apex TITAN, Inc. (Apex) is presenting this Response/Remediation Plan to Enterprise Field Services, LLC (Enterprise) for submittal to the New Mexico Oil Conservation Division (NMOCD) and Bureau of Land Management (BLM) to mitigate the release of natural gas and natural gas liquids associated with the Enterprise 1009 natural gas gathering pipeline. The Response/Remediation Plan describes how Enterprise will respond to the release under NMOCD jurisdiction. The proposed scope of work is based on Apex's review of the previous correspondence between Ms. Dina Ferguson and Mr. Mike Bratcher of the NMOCD, and analytical data that has been generated regarding the site.

SITE LOCATION AND BACKGROUND

The 1009 Line Leak release site is located in Section 23, Township 22 South, Range 30 East, in Eddy County, New Mexico. The geographic coordinates of the site are 32.37060N, 103.85719W. The property affected by the release is managed by the BLM.

The release occurred on March 29, 2015. No water courses were affected. Approximately 29 barrels (bbls) of natural gas pipeline liquids were released from the 1009 pipeline within the right-of-way (ROW). A C-141 form was filed on April 7, 2015 notifying the NMOCD of the intentions of Enterprise to repair the pipeline and remediate the immediate area.

The total excavated area at this time is 55 feet long by 15 feet wide with an approximate depth of 15 feet, observed from the ground surface. The approximate area of the impact is shown on the attached Figure 1.

CHEMICALS OF CONCERN (COCs)

Soil samples collected from the excavation have been analyzed for benzene, toluene, ethylbenzene and xylenes, total petroleum hydrocarbon (TPH) gasoline range organics (GRO), TPH diesel range organics (DRO) and chloride by EPA Methods SW846-8021B, 8015M and E300 respectively. All soil samples were below the NMOCD Recommended Remediation Action Levels for TPH GRO/DRO and chloride. The chemicals of concern (COCs) identified at the site include benzene, toluene, ethylbenzene and xylenes (BTEX).

I. OBJECTIVES OF SCOPE OF WORK

The primary objectives of the scope of work is to backfill the excavation with clean fill material and install one (1) soil boring to define the extent of vertical impact to soil.

I.A. Site Restoration

The current excavation dimensions are approximately 55 feet by 15 feet by 15 feet deep. The excavation will be backfilled with clean fill material. The surface soils at the site will be reseeded with a BLM approved seed mix and returned to approximate original grade.

I.B. Vertical Delineation

I.a. Advancement of Soil Boring

A soil boring will be advanced on-site utilizing an air rotary drilling rig under the supervision of a State of New Mexico licensed monitoring well driller. The soil boring will be placed as near to the release point as possible, taking into account safety and mandated set-backs from the pipeline. The soil boring will be advanced to a maximum depth of approximately 80 feet below ground surface, to the initial water table or 15 feet below the deepest positive photoionization detector (PID) reading, whichever is shallower.

Sampling and drilling equipment will be decontaminated by high pressure cleaning prior to commencement of the project and between the advancement of each soil boring.

Soil samples will be collected continuously to the extent practical using core barrels or split spoon samplers to document lithology, color, relative moisture content and visual or olfactory evidence of impairment. In addition, the samples will be scanned with a photoionization detector (PID) for the presence of VOCs.

Drill cuttings and decontamination water will be stored at a secure Enterprise location in labeled, 55-gallon, DOT-approved drums pending the results of the laboratory analyses. The drum labels will bear the apparent contents of the drum and the accumulation date.

Following the conclusion of the Site investigation activities, Apex will coordinate the removal and disposition of the investigation derived soil and decontamination water generated during investigation activities.

Apex will utilize the investigation data to characterize the waste for off-Site disposal. Apex will evaluate the analytical data and prepare waste profiles for submittal to a landfill approved by the client. Apex will prepare the appropriate manifests to document waste disposition, and will submit the manifests to the client for signature as the generator. It should be noted that it is the generator's responsibility to select the disposal facility and the waste transporter.

I.C. Sampling Program

Apex's soil sampling program will consist of the following:

- 1) Collection of two (2) soil samples from the soil boring from any of the following locations at geologist discretion based on findings:
 - a) the zone exhibiting the highest concentration of VOC's based on visual, olfactory or PID evidence,
 - b) from the capillary fringe zone,
 - c) from a change in lithology, or
 - d) from the bottom of the boring.

The soil samples will be collected in laboratory prepared glassware and placed on ice in a cooler, which will be secured with a custody seal. The samples will be transported to a selected analytical laboratory along with a completed chain-of-custody form.

I.D. Laboratory Analytical Program

The soil samples collected from the soil boring will be analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX) utilizing EPA Method SW-846-8021B.

I.E. Corrective Action Report

Upon completion of site investigation activities, a Corrective Action Report and closure request of the site will be prepared if the field data indicates closure is warranted. The report will include documentation of field investigation activities, a site plan detailing pertinent site features, logs of subsurface exploration, laboratory analytical results, an evaluation of investigation results and recommendations concerning further action, if necessary.

II. PROJECT SCHEDULE

Apex is prepared to commence work on this project immediately following notification to proceed.

We appreciate the opportunity to provide this Response/Remediation Plan and look forward to working with you on this project. If you should have any questions or comments regarding this proposal, please contact the undersigned.

Sincerely,
Apex TITAN, Inc.



Karolanne Toby
Staff Geologist



Liz Scaggs, P.G.
Division Manager

Attachments: Figure 1 - Site Plan