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By JKeyes at 2:42 pm, Oct 28, 2015

APPROVED Conditionally

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Stipulation:
Discrete samples only.

DRAFT (10-13-2015)

DCP Dobbs Booster Sump Release Cleanup Plan

DCP submitted an initial C-141 form on September 30, 2015 for a sump release at its Dobbs Booster Station in Lea County, NM. Based upon our evaluation, the release consisted of 5-10 bbls of a mixture of lube oil, rain water, antifreeze into the soil backfilling the walls of the sump. The cause is still under investigation but is at this time believed to be failure of the sump pump which in turn caused the sump to overtop into the surrounding soil.

DCP proposes to construct another sump 20-30 feet away from the release area and make it operational prior to removing the failed sump from service. DCP will begin remedial activities by vacuuming out all free liquids from the release area around the sump. The sump will then be disconnected, lines blinded off, and the sump removed. DCP will then excavate impacted soil from the sump hole and stockpile the soil on plastic. The depth and lateral extent of soil removed will initially be four feet. Approximately 20 cubic yards of impacted soil will be transported by to Sundance Services' Parabo Facility in Eunice, NM for disposal. A composite sample will be retrieved by a qualified person from the excavated soil and from the bottom of the pit and analyzed for BTEX, TPH, and chlorides. Analyses will be provided to Jon Bebbington, Environmental Specialist at DCP and to OCD for evaluation. BTEX and TPH values must be below BTEX, TPH cleanup criteria prescribed in *Guidelines for Remediation of Leaks, Spills, and Releases* (1993) authored by the New Mexico Oil Conservation Division and is a function of groundwater depth and distance to water wells and surface water bodies. The depth to groundwater is understood to be >100 feet. There are no known domestic water wells within 200 feet, and no water bodies within 1000 feet. Therefore the cleanup criteria are as follows:

Benzene	<10 ppm
BTEX	<50 ppm
TPH	<5000 ppm
Chlorides	TBD

Should the excavated area fail to meet the cleanup criteria, additional soil will be excavated and sampled until criteria are met. Should impacts extend beyond four feet below the excavation bottom and laterally, work will cease pending discussions with OCD. Following passing of cleanup criteria, Microblaze will be applied to the bottom of the excavation. The removed sump will be cleaned and hauled to the Linam Ranch Gas Plant boneyard for repair. A closure report will be prepared for OCD review and will include a narrative of cleanup activities, analyticals, a diagram of impacted area, and a final C-141 form. Non-impacted soil will be used for backfill use.