From:	Yu, Olivia, EMNRD
To:	"Slade, Rose"
Cc:	Oberding, Tomas, EMNRD; Randal Pair
Subject:	RE: A.-14 Compressor Station
Date:	Friday, March 17, 2017 11:53:00 AM
Attachments:	image001.png

Dear Rose:

NMOCD approves the revised delineation workplans for 1RP-4634 and 1RP-4635. Please provide notification of soil sampling events to permit witnessing opportunities.

Thanks,
Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Wednesday, March 15, 2017 2:03 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Cc: Oberding, Tomas, EMNRD <Tomas.Oberding@state.nm.us>; Randal Pair <rpair@blm.gov>
Subject: A.-14 Compressor Station

Good day Ms. Yu,

Thank you for taking the time in speaking with me this morning. I appreciate your patience in working with me. Per our conversations today;

Please find attached the **revised** "Proposed Delineation Workplan" for the A-14 Compressor Station Field Scrubber Site (IRP#4634) and the **revised** "Proposed Delineation Workplan" for the A-14 Compressor Station Below Ground Sump (IRP#4635).

Please find attached: The Delineation Workplans, Site Location Maps, Site Details and Proposed Soil Sample Location Maps, & Site Photographs for both releases to be delineated.

Please note: With NMOCD approval we would like to request approval to proceed with the delineation process beginning March 21, 2017 to further reduce the impaction of the soils & potentially impact groundwater.

If you have any questions, concerns, or require additional information, please do not hesitate to let me know & I will be more than happy to assist.

Respectfully,

Rose Slade

ENERGY TRANSFER

Rose Slade
Sr. Environmental Specialist
800 East Sonterra Suite 2
San Antonio, TX. 78258
210-403-6525 / 432-940-5147

*"she is clothed with dignity and laughs without fear of the future" * Proverbs 31:25*

2057 Commerce Drive
Midland, TX 79703

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432.520.7701 FAX

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March 15, 2017

Olivia Yu
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division, District 1
1625 French Drive
Hobbs, NM 88240

Re: Proposed Delineation Workplan
A-14 Compressor Station Below Ground Sump Release (1RP-4635)
GPS: N32° 14' 46.26" W103° 24' 7.20"
Unit Letter "I", Section 6, Township 24 South, Range 35 East, NMPM
Lea County, New Mexico

Dear Ms. Yu,

TRC Environmental Corporation (TRC), has prepared this *Proposed Delineation Workplan* (Workplan) for the A-14 Compressor Station Below Ground Sump Release (Release Site). The purpose of this Workplan is to propose delineation activities designed to assess the horizontal and vertical extent of impact at the Release Site. The legal description of the Release Site is Unit Letter "I", Section 6, Township 24 South, Range 35 East, in Lea County, New Mexico. The subject property is administered by the United States Bureau of Land Management (BLM). A Site Location Map and Site Details and Proposed Soil Sample Locations Map are provided as Figure 1 and Figure 2, respectively. Release Site photographs are attached to this Workplan.

A groundwater database maintained by The New Mexico Office of the State Engineer (NMOSE) did not identify any registered water wells in Section 6, Township 24 South, Range 35 East. A reference map utilized by the New Mexico Oil Conservation Division (NMOCD) Hobbs District Office indicates groundwater should be encountered at approximately two hundred twenty-five (225) feet below ground surface (bgs). Based on the NMOCD site classification system, zero (0) points will be assigned to the subject area ranking as a result of this criterion. No water wells were observed within one-thousand feet of the Release Site. Based on the NMOCD site classification system, zero (0) points will be assigned to the subject area ranking as a result of this criterion. No surface water was observed within one thousand (1,000) feet of the release. Based on the NMOCD site classification system, zero (0) points will be assigned to the subject area ranking as a result of this criterion.

Based on the NMOCD Site Classification criteria, the Release Site remediation levels are 10 mg/Kg for benzene, 50 mg/Kg for benzene, toluene, ethylbenzene and xylenes (BTEX), and 5,000 mg/Kg for total

petroleum hydrocarbons (TPH). Chloride remediation levels for the Release Site will be 600 mg/Kg, per NMOCD request.

The Release exhibits a surface soil stain, which likely defines the horizontal extent of impact. ETC proposes to collect soil samples adjacent to the surface staining to confirm hydrocarbon and chloride concentrations do not exceed NMOCD and/or BLM regulatory guidelines.

Due to safety concerns and the potential of striking underground equipment within the A-14 Compressor Station, ETC will utilize a hydro-vac prior to any field sampling activities to identify the location of underground pipelines and other associated subsurface equipment. Hydro-vac activities will be conducted no less than five (5) feet from the outer perimeter of surface soil stained areas.

ETC proposes to vertically delineate the Release extent using investigation trenches using a backhoe. Soil samples will be collected at sample points adjacent to the release point (sump) and at approximately forty (40) foot linear intervals along the flowpath to the terminus of the Release Site. Due to the location of piping and equipment within the operating natural gas compressor station and adjoining pasture, proposed investigation trench locations may be moved for safety reasons and a hand auger may be utilized to collect soil samples in areas in which a backhoe cannot operate. Soil samples will be collected from each sample point at approximately six (6) inches below ground surface (bgs) and approximately one (1) foot bgs. If visual evidence, olfactory evidence and/or chloride field screening indicate hydrocarbon and/or chloride impact exceeds one (1) foot bgs, the investigation trenches will be advanced vertically and additional soil samples will be collected as required. Please note, the vertical extent of all investigation trenches will be advanced an additional ten (10) feet bgs and sampled at (5) foot intervals to confirm chloride concentrations do not exceed NMOCD regulatory guidelines. The advancement of the investigation trenches will be suspended when visual and olfactory evidence and chloride field screening indicate hydrocarbon and chloride concentrations do not exceed the NMOCD regulatory guidelines.

One (1) background soil sample will be collected from a non-impacted area approximately fifty (50) feet north of the A-14 Compressor Station at approximately six (6) inches bgs.

Soil samples collected from the activities described above will be submitted to the laboratory and analyzed for concentrations of BTEX using Method SW 846 8021B, TPH using SW 846 8015M and chloride using EPA Method 300.0.

On receipt of the analytical results, a *Soil Investigation Summary and Proposed Remediation Workplan* will be prepared and submitted to the NMOCD and BLM for approval. The *Soil Investigation Summary and Proposed Remediation Workplan* will detail remediation activities designed to progress the Release Site toward an NMOCD and BLM Closure.

ETC is prepared to begin the activities outlined in this *Proposed Delineation Workplan* on NMOCD and BLM approval.

If you have any questions, or if additional information is required, please feel free to call me at 432-520-7720 (office) or 432-664-6699 (cell) or Rose Slade at 210-403-6525.

Respectfully submitted,

Nikki Green
Project Manager
TRC Environmental Corporation

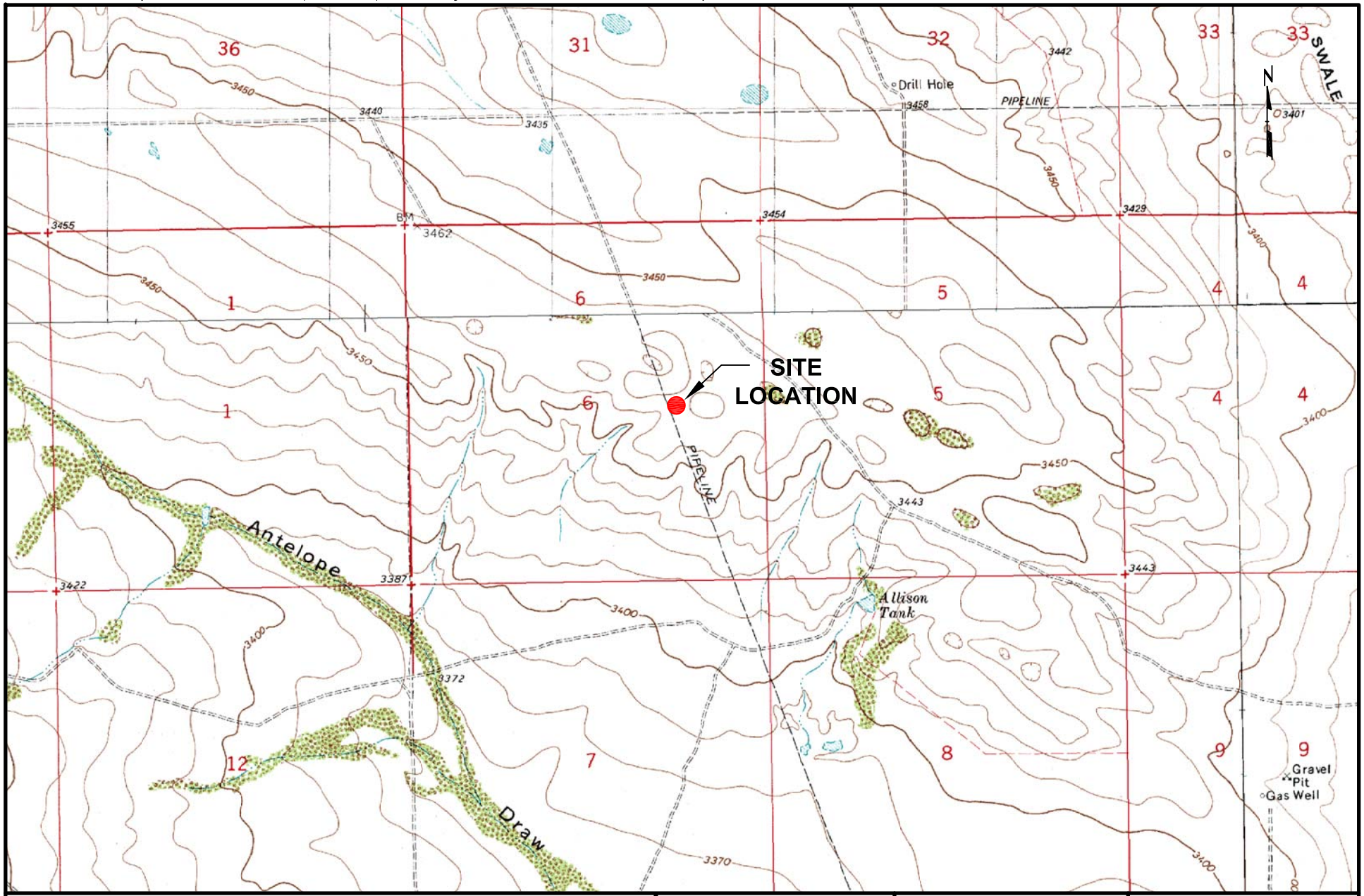
Jeffrey Kindley, PG
Senior Project Manager
TRC Environmental Corporation

Attachments:

Figure 1 - Site Location Map
Figure 2 – Site Details and Proposed Soil Sample Locations Map
Release Site Photographs

cc: File

DRAWING NAME: H:\Nova\Project Files\ETC Field Services\A14 Compressor Stat Sump\ Site Location.dwg — PLOT DATE: March 15, 2017 - 10:38AM — LAYOUT: Layout1



LEGEND:

2000 1000 0 1000 2000

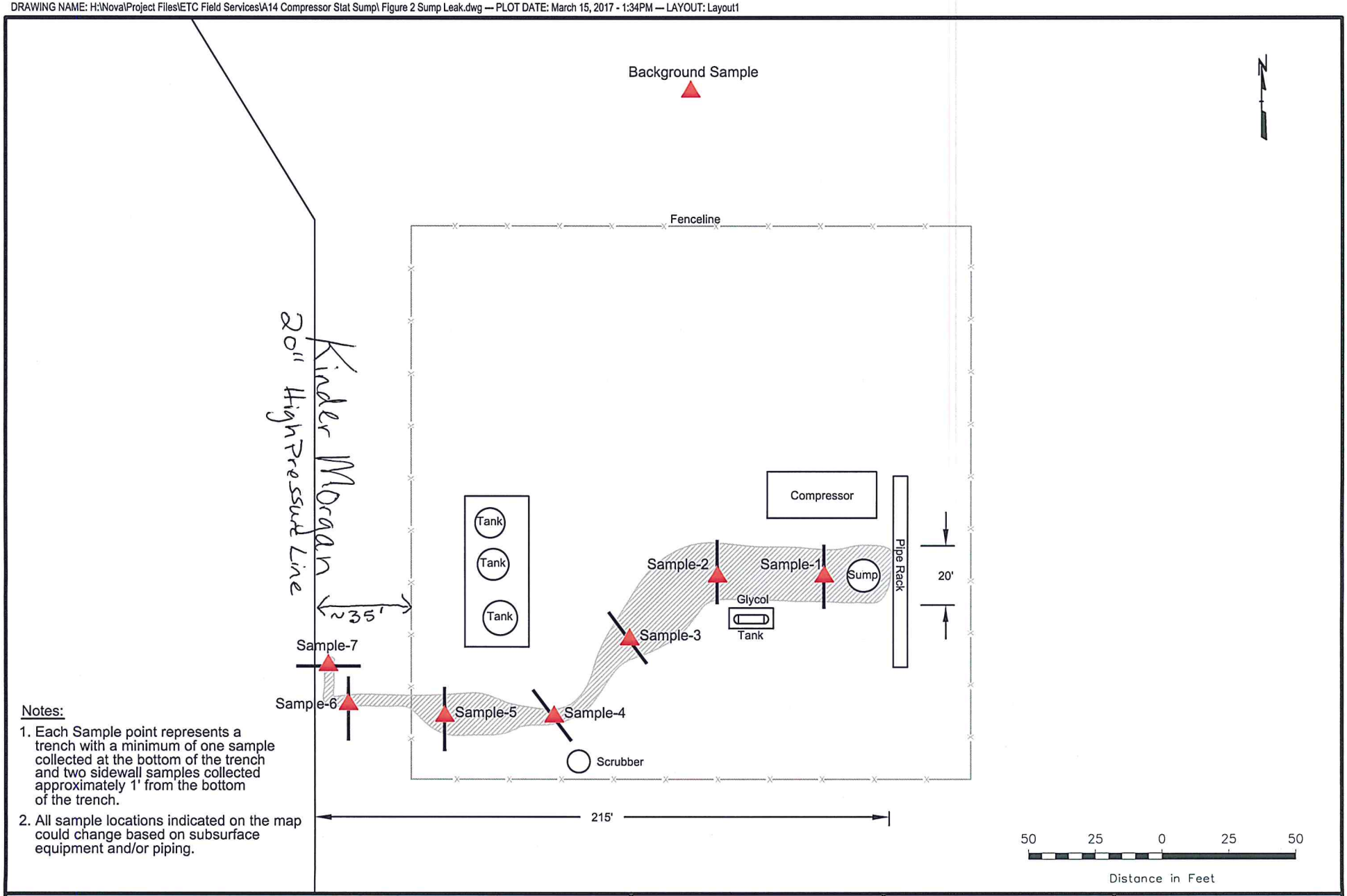
Distance in Feet

Figure 1
Site Location Map
ETC Field Services, LLC
A-14 Compressor Station
Sump
Lea County, NM

Scale: 1" = 2000'	
CAD By: TA	Checked By: CS
Draft: March 3, 2017	
Lat. N 32° 14' 46.26" , Long. W 103° 24' 7.2"	
SE1/4 NE1/4 Sec 6 T24S R35E	
TRC Proj. No.: 273818	

TRC
2057 Commerce Drive
Midland, Texas 79703
432.520.7720

DRAWING NAME: H:\Nova\Project Files\ETC Field Services\A14 Compressor Stat Sump\ Figure 2 Sump Leak.dwg — PLOT DATE: March 15, 2017 - 1:34PM — LAYOUT: Layout1



Notes:

1. Each Sample point represents a trench with a minimum of one sample collected at the bottom of the trench and two sidewall samples collected approximately 1' from the bottom of the trench.
2. All sample locations indicated on the map could change based on subsurface equipment and/or piping.

LEGEND:

- Fence Line
- Proposed Soil Sample Location
- Delineation Trench Location

Figure 2
Site Detail and Proposed Soil Sample Locations
ETC Field Services, LLC
A-14 Compressor Station
Below Ground Sump Release
Lea County, NM

Scale: 1" = 50'	
CAD By: TA	Checked By: NG
Draft: March 4, 2017	
Lat. N 32° 14' 46.26" , Long. W 103° 24' 7.2"	
SE1/4 NE1/4 Sec 6 T24S R35E	
TRC Proj. No.: 273818	

TRC
2057 Commerce Drive
Midland, Texas 79703
432.520.7720

Photographic Documentation

Client: ETC Field Services, LLC **Prepared by:** TRC Environmental Corp.
Project Name: A-14 Compressor Station Below Ground Sump **Location:** Lea County, NM

Photograph No. 1 **Date:** **February 23, 2017** **Description:** **Looking northeast at below ground tank release point.**	
Photograph No. 2 **Date:** **February 23, 2017** **Description:** **Looking northeast at flowpath. Sump toward upper right of photo.**