

From: [Yu, Olivia, EMNRD](#)
To: [Lowry, Joel](#); [Pair, Randal](#); [Yolanda Jordan](#)
Cc: [Slade, Rose](#); [Green, Nikki](#)
Subject: RE: 1RP - 4634, 8/7/2017 - NMOCD Meeting
Date: Thursday, September 7, 2017 9:16:00 AM
Attachments: approved_1RP-4328 - A-14 Slug Overflow - Remediation Summary and Risk-Based Soil Closure Request.pdf

Good morning Mr. Lowry:

NMOCD grants closure to 1RP-4328 with the exception of the portion indicated on Figure 2. Additional delineation and remediation for the specified areas will be deferred until site abandonment or retrofit. The approved document is attached for your records.

Please be advised that if this report is written to reflect current NMOCD permissible levels for chlorides, there are discrepancies indicated in the text and table. Also, please note that Figure 2 and the photo documentation do not clearly demonstrate the dimensions of the release area or the complete excavated area.

Thanks,

Olivia Yu
Environmental Specialist
NMOCD, District I
Olivia.yu@state.nm.us
575-393-6161 x113

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: Lowry, Joel [mailto:JLowry@trcsolutions.com]
Sent: Tuesday, August 8, 2017 11:58 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Pair, Randal <rpair@blm.gov>; Yolanda Jordan <yjordan@blm.gov>
Cc: Slade, Rose <Rose.Slade@energytransfer.com>; Green, Nikki <NGreen@trcsolutions.com>
Subject: 1RP - 4634, 8/7/2017 - NMOCD Meeting

Ms. Yu,

Pleasure meeting with you yesterday. As per our meeting, and upon receiving concurrence from the BLM, ETC will move forward as discussed during the meeting and described below.

A-14 Compressor Station Slug Overflow (1RP-4328)

Permission to Finalize and Submit Risk-Based Soil Closure Request

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The A-14 Compressor Station Slug Overflow is a historical release site that was remediated in 2013. The initial Form C-141 indicated a malfunction of an alternate gas producer's facility resulted in a slug of oil being sent through the gathering lines, overwhelming the scrubber, above-ground storage tanks and secondary containment, resulting in the release of approximately 8 bbls of crude oil, affecting approximately 1,300 square feet outside the secondary containment area. Prior to the preparation of a *Remediation Summary and Risk-Based Soil Closure Proposal* the project came under the control of alternative environmental professionals; it has since been transfer back to TRC. Review of laboratory analytical results from confirmation soil samples collected from the floor and sidewalls of the excavated area and available documentation indicated benzene, BTEX, TPH and chloride concentrations were below the NMOCD RRAL in each of the submitted soil samples and that approximately 360 cubic yards of impacted soil was transported to a permitted disposal. Analytical results from soil samples collected from affected soil beneath the secondary above-ground tank containment remaining in-situ indicated concentrations of chloride and/or TPH exceeded the NMOCD RRAL in soil beneath the northern and eastern portions of the fiberglass containment. ETC maintains additional excavation of affected soil beneath the northern and eastern portions of the secondary containment poses a safety risk and could compromise the integrity of the secondary containment and associated condensate storage tanks. ETC presented a *Remediation Summary and Risk-Based Soil Closure Request* to the NMOCD detailing field activities and the results of laboratory analysis from confirmation soil samples, requesting permission to leave affected soil beneath the northern and eastern portions of the secondary containment exhibiting TPH and/or chloride concentrations above the NMOCD RRAL, represented by soil samples Containment EW @ 2', Containment NW @ 2' and Containment NW-1 @ 2', in-situ until time of abandonment (TOA). The request was subsequently approved, with the caveat that the *Remediation Summary and Risk-Based Soil Closure Request* be modified to include a map that depicts affected soil that is to be remediated at time of abandonment (TOA). Please reference the attached *Remediation Summary and Risk-Based Soil Closure Request*, which includes a revised "Site and Sample Location Map" depicting the inferred extent of affected soil remaining in-situ.

A-14 Compressor Station Field Scrubber Release (1RP-4634)

Permission to Backfill Remediated Portion of the Excavated Area to facilitate additional excavation of impacted soil remaining in-situ adjacent to Kinder Morgan Pipeline in western portion of site.

Laboratory analytical results from confirmation soil samples collected in the eastern portion of the site indicate BTEX, TPH and chloride concentrations are below the NMOCD RRAL in each of the submitted soil samples. ETC has requested NMOCD and BLM permission to backfill the eastern portion of the excavated area before proceeding to excavate impacted soil adjacent to, and on top of, the Kinder Morgan Pipeline that transects the western portion of the site. NMOCD permission was subsequently granted. Please reference the *Remediation Summary and Permission to Backfill Request, A-14 Compressor Station Field Scrubber Release*, dated July 27, 2017, for additional details. Upon backfilling the eastern portion of the excavated area, remediating remaining soil impacts adjacent to the Kinder Morgan pipeline, and receiving laboratory analytical results from confirmation

soil samples, a *Remediation Summary and Soil Closure Report* will be prepared detailing field activities and the results for laboratory analysis from confirmation soil samples.

A-14 Compressor Station (Below Ground Sump) Release (1RP-4635)

Permission to Backfill

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Laboratory analytical results from confirmation soil samples indicate BTEX, TPH and chloride concentrations are below the NMOCD RRAL in each of the submitted soil samples. ETC has requested NMOCD and BLM permission to backfill the excavated area. The request indicates that a majority of the backfill needs will be met with locally-sourced, non-impacted fill material. It should be noted that ETC has requested permission to use approximately 10 cubic yards of soil currently stockpiled on-site, exhumed with a hydrovac during line spotting activities outside the affected area, to meet a portion of the backfill needs. The approximate 10 cubic yards of hydrovac solids has been sampled for concentrations of BTEX, TPH and chloride, which were determined to be below the NMOCD RRAL. NMOCD permission was subsequently granted. Please reference the *Remediation Summary and Permission to Backfill Request, A-14 Compressor Station (Below Ground Sump) Release*, dated July 27, 2017, for additional details. Upon backfilling the excavated area, a *Remediation Summary and Soil Closure Report* will be prepared detailing field activities and the results for laboratory analysis from confirmation soil samples.

Mr. Pair,

I understand that you may have been provided with electronic copies of the formal Permission to Backfill Requests for the A-14 Compressor Station Field Scrubber (1RP-4634) and Below Grade Sump (1RP-4635), which are two of the documents that we discussed; we did not deviate from those requests during the meeting. It is unlikely that you have seen any information on the A-14 Slug Overflow (1RP-4328), which only recently came back on the radar. I have tried my best to summarize the meeting and the information that is in the attached *Remediation Summary and Risk-Based Soil Closure Request*. If you have any requests aside from those of the NMOCD, please let me know and we will do our best to meet them. Alternatively, if you are satisfied with us meeting the requirements of the NMOCD, we are prepared to close the site. If you have any questions or need any additional information, please feel free to contact Nikki, Rose or myself by phone or email. Thanks.

Respectfully,

Joel Lowry

Senior Project Manager



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