From: Yu, Olivia, EMNRD
To: "Slade, Rose"; Yolanda Jordan
Cc: Lowry, Joel
Subject: RE: A-14 Compressor Station Field Scrubber Release (IRP#4634)
Date: Wednesday, September 27, 2017 12:38:00 PM
Attachments: approved_1RP4634_KM.pdf

Dear Ms. Slade:

NMOCD grants backfill approval for the excavated area near the Kinder Morgan pipeline for 1RP-4634. Please see the attachment for your records.

Thanks,

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

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Wednesday, September 6, 2017 11:11 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Randal Pair <rpair@blm.gov>
Cc: Lowry, Joel <JLowry@trcsolutions.com>
Subject: A-14 Compressor Station Field Scrubber Release (IRP#4634)

Good afternoon,

Please see below a summary of field events associated with the A-14 Compressor Station Field Scrubber Release (IRP#4634) on the Kinder Morgan Right of Way (ROW).

Please see the attached Table-1, which summarizes the laboratory analytical results for all collected samples for the A-14 Compressor Station Field Scrubber Release Site, Updated Site Detail and Confirmation Soil Sampling Map, and the laboratory analytical results for the samples collected in the vicinity of the Kinder Morgan High Pressure Line.

On July 11, 2017, TRC collected one (1) soil sample (KM-1 3") from the impacted soil above the Kinder Morgan High Pressure Steel Line ROW and submitted the soil sample to the laboratory for BTEX (Method 8021B), TPH (Method 8015M), and chloride (Method E 300.1) analysis. A review of

laboratory analytical results indicated benzene (<0.00200 mg/Kg), BTEX (<0.00399 mg/Kg), and chloride (10.9 mg/Kg) concentrations were below NMOCD regulatory guidelines and TPH concentrations (6,690 mg/Kg) were above NMOCD regulatory guidelines, which indicated excavation activities were necessary in the area represented by soil sample KM-1 3" (approximately 10 feet in width and 20 feet in length).

Due to the impacted area being located above the Kinder Morgan ROW, a Kinder Morgan representative was required to be onsite during excavation activities. On August 22, 2017, TRC commenced excavation activities on the Kinder Morgan ROW utilizing hand tools. The area was excavated to approximately six (6) inches bgs and approximately ten (10) cubic yards of soil was excavated and temporarily stockpiled on a plastic liner, pending disposal. One (1) soil sample was collected from the excavated area and submitted for TPH analysis. A review of laboratory analytical results indicated TPH concentrations (3,319 mg/Kg) were below NMOCD regulatory guidelines.

Based on the laboratory analytical results, ETC requests NMOCD and BLM approval to backfill the area represented by soil samples KM-1 3" and KM-1a 6" with locally purchased non-impacted "like" soil.

If you have any questions or concerns, or require additional information, please contact Joel or myself and we will be more than happy to assist.

Respectfully,

Rose Slade

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Rose L. Slade
Senior Environmental Specialist,
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From:	Pair, Randal
To:	Yu, Olivia, EMNRD
Cc:	Lowry, Joel; Yolanda Jordan; Slade, Rose; Green, Nikki
Subject:	Re: 1RP - 4634, 8/7/2017 - NMOCD Meeting
Date:	Friday, September 8, 2017 6:56:51 PM
Attachments:	Seed_Mixture_1_Loamy Sites.doc

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1. General notes on this facility
a. This facility was approved under BLM R/W NM-117260, as part of a pipeline running SE through Sec 5 into Sec 8. Please ensure that this R/W Identificaiton number is displayed on both the facility and on the pipeline, near where it leaves the station and where it leaves BLM lands at the Sec 6 - Sec 5 section line.
b. In the future, please attach that BLM R/W identification number to all correspondence.
c. BLM continues to hold the R/W grantee responsible for all contamination resulting from operations at this site until the site is decommissioned and the R/W relinquished.
d. All remedial work where backfilling is not covered by caliche or other surfacing should be reseeded with the attached seed mixture. If any of these species are not available, ask BLM for a substitute.

2. 1RP-4635
Based on the information in this submittal, BLM approves backfilling with uncontaminated material.

3.1RP-4634
Based on the information in this submittal, BLM approves backfilling with uncontaminated material.

4. 1RP-4328
Joel - I never did get anything on this one - you said you were emailing it, but I did not find it. But if OCD has accepted the closure report, BLM is willing to accept it. Please forward me a copy of OCD's acceptance/approval of the closure report.

Randal "Randy" Pair
Envir. Protection Specialist - Realty Compliance
office: 575.234.6240
cell: 575.361.0062
email: rpair@blm.gov

On Thu, Sep 7, 2017 at 9:17 AM, Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us> wrote:

> 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

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

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

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 game 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 thesite. 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

2057 Commerce Drive, Midland, TX 79703

T: 432-520-7720 | F: 432-520-7701 | C: 432-466-4450

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Seed Mixture 1 for Loamy Sites

Holder shall seed all disturbed areas with the seed mixture listed below. The seed mixture shall be planted in the amounts specified in pounds of pure live seed (PLS)* per acre. There shall be no primary or secondary noxious weeds in the seed mixture. Seed shall be tested and the viability testing of seed will be done in accordance with State law(s) and within nine (9) months prior to purchase. Commercial seed shall be either certified or registered seed. The seed container shall be tagged in accordance with State law(s) and available for inspection by the Authorized Officer.

Seed shall be planted using a drill equipped with a depth regulator to ensure proper depth regulator to ensure proper depth of planting where drilling is possible. The seed mixture shall be evenly and uniformly planted over the disturbed area (small/heavier seeds have a tendency to drop the bottom of the drill and are planted first). Holder shall take appropriate measures to ensure this does not occur. Where drilling is not possible, seed shall be broadcast and the area shall be raked or chained to cover the seed. When broadcasting the seed, the pounds per acre shall be doubled. The seeding shall be repeated until a satisfactory stand is established as determined by the Authorized Officer. Evaluation of growth may not be made before completion of at least one full growing season after seeding.

Species to be planted in pounds of pure live seed* per acre:

Species	lb/acre
Plains lovegrass (Eragrostis intermedia)	0.5
Sand dropseed (Sporobolus cryptandrus)	1.0
Sideoats grama (Bouteloua curtipendula)	5.0
Plains bristlegrass (Setaria macrostachya)	2.0

*Pounds of pure live seed:

Pounds of seed **x** percent purity **x** percent germination = pounds pure live seed