# NMOCD APPROVED REMEDIATION SUMMARY AND SITE CLOSURE FOR THE RHOMBUS UNION STATE COM 1 1RP-4671

APPROVED

By Olivia Yu at 12:05 pm, Dec 01, 2017

NMOCD approves of the delineation for 1RP-4671 and proposed remediation.

October 26, 2017

Ms. Olivia Yu NMOCD District 1 1625 N. French Drive Hobbs, New Mexico 88240

#### **REFERENCE:** NMOCD APPROVED SOIL REMEDIATION WORK PLAN FOR INCIDENT 1RP-4671 RHOMBUS UNION STATE #1 LEA COUNTY, NEW MEXICO

Dear Ms. Yu:

Frontier Field Services (FFS) is pleased to submit the attached Remediation Summary for the Rhombus Union State Com #1, which provides recent analytical reports and excavation volumes. The remediation was completed in accordance with the enclosed New Mexico Oil Conservation Division (NMOCD) Approved Remediation Plan. The completion of the recent excavation and closure sampling meets NMOCD guidelines and regulations for remediation of the release that occurred on April 02, 2017.

Frontier responded immediately to evaluate and delineate the pipeline liquids released connected with the Rhombus Union State Com #1 location. Initial notifications to NMOCD were made internally by the FFS Environmental Group on April 03, 2017, at ~10:43 AM. Table 1 below summarizes information relevant to this release. Results of the assessment and delineation follow in the attached tables and laboratory analytical reports.

Name	Rhombu	us Union St	ate Com #1	
	Incident Number	Section	Township	Range
Location	1RP-4671	32	185	34E
Estimated Date of Release	April 3, 2017			
Date Reported to NMOCD	April 4, 2017			
Reported By	Frontier EHS D	epartment,	Harley Ever	hart
Property Owner	State of New M	lexico		
Reported To	New Mexico C (NMOCD)	onservation	Division	

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# Frontier Field Services

65 Mercado St. Durango,	, CO	81301	
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Source of Release	Pipeline
Released Material	Pipeline Liquids
Released Volumes	~10-15 bbl.
Recovery Volumes	0 bbl.
Nearest Surface Water	≥7.9 Miles South West of Location
Depth to Ground Water	$\geq$ 50 Feet
Nearest Domestic Water Source	≥7500 Feet North and North East of Location
NMOCD Ranking	10
Estimated Volume Contaminated Soil Excavated and Disposal	Estimated 250 Cubic Yards
Chloride Soil Excavated and Disposal	Estimated 200 Cubic Yards
Disposal Location	R-360
Analytical Sampling Location	Cardinal Labs Hobbs, NM 88240

A copy of the Initial C-141 Release Notification and Corrective Action from this location will be categorized as Appendix A. Should you have any additional questions or comments in reference to this release or Work Plan, please do not hesitate to contact me.

Submitted By:

Frontier Field Service LLC

Harley Everhart Project EHS Reviewed By:

Southern Ute Growth Fund

Graham Stahnke, PE Senior Environmental Compliance Specialist

Attached: 1) Site Remediation Work Plan

# NMOCD APPROVED SOIL REMEDIATION WORK PLAN FOR INCIDENT 1RP-4671

## FRONTIER FIELD SERVICES LLC RHOMBUS UNION STATE COM # 1 SECTION 32, TOWNSHIP 18S, RANGE 34E LEA COUNTY, NEW MEXICO



Prepared by: Frontier Field Service LLC 1001 Conoco Rd Maljamar, NM 88264 July 7, 2017

## Frontier Field Services

65 Mercado St. Durango, CO 81301

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- Conclusions and Recommendations VI)
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#### **Figures:**

Figure 1 - Vicinity Map

Figure 2 - Site Map

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#### Tables:

Table 1 - Release Information and Site Ranking

Table 2 - Summary of Initial Soil Sampling Results

Table 3 - Summary of Chlorides Sampling Results

#### Appendices:

Appendix A - Laboratory Analytical Reports including additional Analytical Reports Appendix B - C-141 Initial Report Appendix C - NMSE Well Data

#### I) Introduction:

Frontier Field Services (Frontier), a wholly owned subsidiary of Aka Energy Group, LLC, has prepared this report that describes the assessment and initial delineation of the release associated with the Rhombus Union State Com #1, in Lea County New Mexico, property owned by the State of New Mexico. Figure 1, provides the vicinity map for the site. This document embraces the proposed Work Plan to address the release.

## II) Site Ranking and Land Jurisdiction:

This release site is located approximately 7.9 miles (>1,000 feet) southwest from Laguna Tonto, in an area owned by the State of New Mexico at an elevation of 3910 feet above sea level. By evaluating the site using aerial photography and topographic maps and by reviewing the New Mexico Office of the State Engineers online Water Rights Database the nearest ground water is estimated to be greater than 7500 feet north/northeast from the release site and estimated 50 feet or greater below ground surface (bgs.). Figure 1 depicts the site vicinity and Figure 2 depicts the site details and sample locations. The physical location of this release is within the jurisdiction of NMOCD.

This release location has been assigned an NMOCD ranking of 10 which requires a soil remediation standard of 10 parts per-million (ppm) benzene, 50 ppm combined benzene, toluene, ethyl-benzene, and total xylenes (BTEX), and 1000 ppm total petroleum hydrocarbons (TPH). Table 1 illustrates site ranking rational.

#### III) Assessment and Initial Results:

On May 19, 2017, samples were collected from 12 locations to a depth of approximately 2.5 to 3.0 feet bgs., as illustrated on Figure 2 and Figure 3, by Frontier EHS Group. All samples were collected and processed according to NMOCD soil sampling procedures. The laboratory samples were sent under chain-of-custody protocols to Cardinal Labs in Hobbs, NM for analysis for Benzene and Total BTEX using EPA Method 8021B, DRO and Extended DRO, GRO by EPA Method 8015M, and total Chlorides using EPA Method SM4500CI-B. The Analytical results are summarized in Table 2 and Table 3.

The initial affected area was found to be approximately 150 feet long by 10 feet wide by 3 feet deep. (Approximately 5100 square feet). The release impact area was found around the meter run moving south down a traveled roadway along an existing Rhombus well location.

#### IV) Initial Soil Remediation Work Plan:

On April 2, 2017, the pipeline (meter-run) was blocked in to replace a section of the pipeline that was leaking. Rocky Peak (Remediation Contractor) completed a New Mexico One-Call to ensure the safety of their employees and to prevent damage to existing utility lines. The impacted soil was removed and temporarily placed on plastic, then hauled for disposal to R-360.

A calibrated field PID was used to map the plume of impacted soil according to NMOCD guidelines. Analytical samples were taken and submitted to Cardinal Labs to confirm results.

Based on the Lab Analytical results the chlorides levels proved to be higher at the impacted area. NMOCD review the initial sample result and made specifications that chloride level >600 ppm would need to be delineated. This set limit affected sample location's 1, 2, 5, 6, and 10.

The chloride affected area(s) resulted in an additional 5400 cubic feet of delineated impacts. The chloride samples were collected over a period from June 26, 2017 to July 6, 2017, to reach the NMOCD acceptable chloride limits of  $\leq$ 600 ppm. (Figure 3). All analytical results are provided in Appendix A. On July 7, 2017, all sample locations me the NMOCD chloride standard of  $\leq$ 600 ppm. Analytical Chloride results are summarized in Table 3. A 20 mil liner will be laid before backfilling of any clean soil begins.

Additional Delineation and Remediation for 1RP-4671 on the following 8 pages



# SOUTHERN UTE INDIAN TRIBE

SAFETY & ENVIRONMENTAL COMPLIANCE MANAGEMENT GROUP

September 7, 2017

Ms. Olivia Yu Environmental Specialist New Mexico Oil Conservation Division, District 1 <u>Olivia.yu@state.nm.us</u>

NMOCD approves of the proposed additional delineation and remediation for 1RP-4671.

By Olivia Yu at 7:57 am, Sep 22, 2017

Subject: Frontier Field Services, LLC Remediation and Closure of Rhombus Union State Com 1 1RP-4671

Dear Ms. Yu,

On behalf of Frontier Field Services, LLC (Frontier), a wholly-owned subsidiary of the Southern Ute Indian Tribe, the following responses are provided to address questions posed in your email dated August 7, 2017, regarding the release at the Rhombus State Com 1. The questions from your email are numbered below and italicized, with Frontier's responses below each question.

1. The release volume has been revised. Provide calculations for this adjustment from 10-15 bbls reported on the initial C141 to the 5 bbls volume indicated in the report dated July 7, 2017.

Frontier will revise the report to match the original estimated release volume of 10 – 15 bbl. Frontier will submit the report to NMOCD once final cleanup activities are complete.

2. Explain the rationale for the June 27-30 series of sampling dates for Sample location 6, 10, Repeat #1 and #5. Was sampling on these days at the same spot? Repeat sampling at specific locations does not represent delineation. As explained in the email dated June 9, 2017, vertical delineation must show a minimal of 5 ft. of permissible chloride levels. In other words, NMOCD expects to see confirmatory laboratory results of the first depth with <= 600 mg/kg and the depth 5 ft. further with <= 600 mg/kg.</p>

The repeat samples collected between June 27<sup>th</sup> and June 30<sup>th</sup> were collected after additional impacted soil was excavated. Frontier mobilized heavy equipment to excavate the additional soil in the areas with elevated chloride levels (Sample locations #1, #2, #5, #6 and #10) and then resampled at the stated depths (A - surface, B - 2.5 feet below ground surface (bgs), C - 5 feet below ground surface). Repeat samples were not collected at the same locations, rather the repeat samples were collected as near to the original sample location as possible after excavation and removal of additional impacted soil. Each of the sample locations that had chloride concentrations which exceeded the NMOCD standard of 600 mg/kg are addressed individually below.

#### Sample #1 Location

Frontier excavated additional soil to a depth of seven (7) feet bgs from the Sample #1 location on June 27th – 29th, and then resampled. The final sample collected on July 6th was reported below the applicable chloride cleanup level. Frontier proposes collecting an additional sample from this

Rhombus Union State Com 1

#### September 7, 2017 Page 2 of 4

location at 12 feet bgs to demonstrate that there is five (5) feet of soil that meets the permissible chloride level.

#### Sample #2 Location

Frontier excavated additional soil from the Sample #2 location on June 27th and then resampled, with samples collected from the surficial soil (Sample 2-A) as well as 2.5 feet bgs (Sample 2-B) and five (5) feet bgs (Sample 2-C). All samples were reported below the chloride cleanup level of 600 mg/kg, and no additional excavation or sampling is proposed at this location as five (5) feet of soil which meet the chloride cleanup level has been demonstrated (Samples 2-A, 2-B and 2-C collected on June 27th).

#### Sample #5 Location

Frontier excavated additional soil from the Sample #5 location on June 27th and 28th and then resampled. The sample collected from five (5) feet bgs on June 29th (Sample Repeat #5) was reported below the applicable chloride cleanup level. Frontier proposes collecting an additional sample from this location at ten (10) feet bgs to demonstrate that there is five (5) feet of soil that meets the permissible chloride level.

#### Sample #6 Location

Frontier excavated additional soil from the Sample #6 location between June 27th and 29th and then resampled on June 30th, with samples collected from the surficial soil (Sample 6-A) as well as 2.5 feet bgs (Sample 6-B) and five (5) feet bgs (Sample 6-C). All samples were reported below the chloride cleanup level of 600 mg/kg, and no additional excavation or sampling is proposed at this location as five (5) feet of soil which meet the chloride cleanup level has been demonstrated (Sample 6-A, 6-B and 6-C collected on June 30th).

#### Sample #10 Location

Frontier excavated additional soil from the Sample #10 location on June 27th and 28th and then resampled on June 29th, with samples collected from the surficial soil (Sample 10-A) as well as two (2) feet bgs (Sample 10-B) and four (4) feet bgs (Sample 10-C). All samples were reported below the chloride cleanup level of 600 mg/kg, however, as five (5) feet of soil below the chloride cleanup level has not been demonstrated, Frontier proposes collecting an additional sample from this location at five (5) feet bgs.

3. What does A, B, and C denote in the Sample ID? Do these refer to the sampling depth?

A, B, and C denote different sampling depths for the analytical samples. Sampling depths are noted in Tables 2 and 3 of the Remediation and Closure of Rhombus Union State Com 1 1RP-4671 report.

4. Samples 4, 7, 8, 9, X have total TPH levels above permissible 1000 mg/kg. Vertical delineation is not complete. Total TPH levels must be obtained and maintained for a minimum of 2 ft. further in depth.

Frontier proposes excavating additional soil from the locations of samples 4, 7, 8/X (Sample X is a blind duplicate of Sample #8), and 9. Once analytical closure samples collected from the bottom of the excavation are reported with TPH concentrations below the NMOCD TPH cleanup level of 1,000 mg/kg, Frontier will collect an additional analytical sample two (2) feet below the bottom of the excavation using a hand auger.

5. As per the appended to the reviewed initial C141, to confirm that permissible levels of BTEX, TPH, and chlorides are obtained horizontally, a minimum of 4 cardinal sample locations should be established laterally around the release area.

September 7, 2017 Page 3 of 4

The previously collected samples include samples collected in three (3) of the cardinal directions around the release location including to the north (Sample #2), south (Sample #3) and west (Sample #1). Frontier will collect an additional sample to the east of the release location.

# 6. What is the proposed remedial plan? Please be advised that sidewall and bottom confirmation samples are required for closure.

The remedial plan is to excavate impacted soils to below NMOCD applicable levels. Additional excavation is proposed for the following locations with TPH levels above 1,000 mg/kg; Samples 4, 7, 8/X, and 9. Frontier will excavate additional soil from these locations and collect a closure sample from the bottom of the excavation. If the closure sample is below the NMOCD TPH cleanup level of 1,000 mg/kg, Frontier will use a hand auger to collect an additional analytical sample from two (2) feet below the bottom closure sample.

Once closure samples confirm that contaminants have been removed to below NMOCD levels (600 mg/kg for chlorides, 1,000 mg/kg TPH), the area will be backfilled. As this area is within a roadway, the backfilled area will be compacted to ensure structural stability of the roadway. No seeding will take place within the areas required for use as roadways. Frontier will seed the bar ditch and road shoulder as required.

## 7. NMSLO may have differing requirements for the revegetation plan.

The proposed seed mixture and application rates for the bar ditch and road shoulder are included below:

Common Name	Scientific Name	Pounds of Pure Live Seed per Acre
Sand Bluestem	Anthropogo hallii	0.5
Little Bluestem	Schizachyrium scoparium	0.5
Sideoats grama	Bouteloua curtipendula	1.5
Sand Dropseed	Sporobolus cryptandrus	0.5
Spike Dropseed	S. contrandus	0.5
Mesa Dropseed	S. flexuosus	0.5
Plains Bristlegrass	Sentaria macrostachya	2.0
Desert or Scarlket Globermallow	Sphaeralcea ambigua or S. coccinea	0.5
Buckwheat	Eriogonum spp.	1.5

#### Table 1 - Proposed Seed Mix and Application Rates

#### Conclusion

In summary, Frontier has addressed the questions posed in your August 7th, 2017 email and has developed the following tables with proposed sampling locations and depths for NMOCD approval prior to initiating additional excavation work and sampling.

Sample ID	Description	Chloride Concentration of Deepest Sample	Proposed Action
Sample #1	Northeast floor	80 mg/kg @ 7 feet bgs	Collect additional sample at 12 feet bgs
Sample #5	Middle floor	480 mg/kg @ 5 feet bgs	Collect additional sample at ten (10) feet bgs
Sample #10	Southwest wall	112 mg/kg @ 4 feet bgs	Collect additional sample at five (5) feet bgs

#### Table 2 - Proposed Additional Excavation and Sampling for Chlorides

Sample ID	Description	TPH Concentration	Proposed Action
Sample #4	Northwest wall	2,244 mg/kg @ 2.5 feet bgs	Additional excavation until TPH concentration in closure sample is below 1,000 mg/kg and then additional sample two (2) feet below.
Sample #7	Middle west wall	1,457 mg/kg @2.5 feet bgs	Additional excavation until TPH concentration in closure sample is below 1,000 mg/kg and then additional sample two (2) feet below.
Sample #8/X	Middle south floor	1,730 and 1,210 mg/kg respectively @ 3 feet bgs	Additional excavation until TPH concentration in closure sample is below 1,000 mg/kg and then additional sample two (2) feet below.
Sample #9	Southeast wall	2,361 mg/kg @ 2.5 feet bgs	Additional excavation until TPH concentration in closure sample is below 1,000 mg/kg and then additional sample two (2) feet below.

Table 3 - Proposed	Additional	Excavation	and	Sam	pling	for TPH	
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Should you have any questions regarding this response or proposed additional excavation and sampling, please contact me at (970) 764-6484.

Respectfully Submitted,

Graham Stahnke, PE Sr. Environmental Compliance Specialist Southern Ute Growth Fund

cc: Harley Everhart, Frontier Field Services, LLC Andy Young, Regulatory Compliance Manager, SUGF Amber Groves, SLO

Aka Energy Group	71 / Rhombus Union State Com #1	oncentration Levels Soil Samples
	1RP-4673	TPH COI

	And and an other statements of the statement of the state	and the second data was not as a se												
Sample ID	Sample # 4	Sample # 4 Sample # 7 Sample # 8 Sample # 9 Sample # X	Sample # 8	Sample # 9	Sample # X								Units	NMOCD Cleanup Levels
Counto Doneh (foot hos)	100	8'	7'	.9	7'									
Date Date	10/10/2017	10/10/2017 10/10/2017 10/10/2017	10/10/2017	10/10/2017	10/10/2017 10/10/2017						-			
									1 111	NIN	NIA	N/A	mg/Kg	TBD
	N/M	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	VIN		110	malka	TBD
Benzene		110	NIN	VIN	N/N	N/N	N/N	N/N	N/N	V/N	V/N	HIN	94/911	LOU
Toluene	N/N	VIN	WIN	u la		111	NIN	NIN	N/N	N/A	N/A	N/A	mg/Kg	101
Cehulhanzono	N/A	N/A	N/A	N/A	N/A	N/N	N/N	WIN		111	VIIV	NIA	me/Kg	TBD
Eurynenkene		VI V	NIN	NIN	NIA	N/A	N/A	N/N	N/N	N/N	V/N	VIN	0.10.	COT
Total Xylenes	N/A	N/A	VIN	W/M	when a			AL IA	VIN	N/A	N/A	N/A	mg/Kg	180
Total RTFX	N/A	N/A	N/A	N/A	N/A	V/N	N/N	N/N	N/M		NIA	NIA	me/Ke	TBD
	0110	N1/A	MIN	N/N	N/A	N/A	N/A	V/N	N/A	N/N	WIN		111	TDD
Chloride	NIA	VIN	N/M	- In the second se		4114	110	NIA	N/A	N/A	N/A	N/N	mg/Kg	IBD
CBO	<10.0	<10.0	<10.0	<10.0	<10.0	N/N	NIA	VIN			NIA	NIA	me/Ke	TBD
OND	001	0.01-	100	<10.0	<10.0	N/A	N/A	N/N	N/A	N/A	N/N	u /u	0. 10	TOT
DRO	<10.0	n'nrs	ANT	0.01		ALIA	VIIV	VI/V	NI/A	N/A	N/A	N/N	mg/Kg	190
EVT DRO	<10.0	<10.0	<10.0	<10.0	0.01>	N/A	W/M	in the second second		Contract on the local division of the local	the supervised and the supervised of the supervi		Amonora	Remediation P

Note: This remediation site was not detrimental to public health, fresh water, animals, plant life, or to property

Acronyms:

DRO = Diesel Range Organics (C6 - C10) GRO = Gasoline Range Organics (>C10 - C28) EXT DRO = Diesel Range Organics (>C28-C36) TBD = To Be Determined NMOCD = New Mexico Oil Conservation Division

# Aka Energy Group 1RP-4671 / Rhombus Union State Com #1 Auger 5' Chloride Soil Samples

Sample ID Description	Sample #1	Sample # 5	Sample # 1 Sample # 5 Sample # 10										Units	NMOCD Cleanup Levels
Sample Depth (feet bgs)	12'	10'	9'											
Date	10/10/2017	10/10/2017 10/10/2017 10/10/2017	10/10/2017											
								1 111	NIA	VIIV	N/A	N/A	mg/Kg	TBD
Renzene	NIA	N/A	N/A	N/A	N/A	N/A	N/N	N/N	N/N	WIN		0110	malka	TRD
	VI/V	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/N	VIN	34/9m	COL
Ionene		VIIV	VI IV	N/N	NIA	N/A	NIA	N/A	N/N	N/A	N/A	N/A	mg/kg	100
Ethylbenzene	N/N	1./M	VIN				AL LA	NIN	VI/V	N/N	N/A	N/A	BX/Bm	TBD
Total Xvlenes	N/A	N/A	N/N	N/A	N/N	N/N	N/N	WIN	u/m			6110	malka	TRD
and a most	VIIV	NIA	N/N	N/N	N/A	N/A	N/N	N/A	N/N	N/N	N/A	N/N	9v/9m	
Total BIEX	V/N	VIN			111	NI N	NI IA	VIV	NIA	N/A	N/A	N/N	mg/Kg	TBD
Chloride	128	128	32	N/A	N/A	N/N	VIN	w/m			110	NIA	malka	TBD
	NIA	VIIV	N/A	N/A	N/A	N/A	N/A	N/A	N/N	N/A	N/A	WIN	9419111	
GKU	VIN	when a	VIIV	11/1	NIN	N/N	N/A	N/A	N/A	N/N	N/A	N/A	mg/Kg	180
DRO	N/N	N/A	N/N	VIN	VIN			NIN	VI IV	NIA	NIA	N/A	mg/Kg	TBD
CAT DRO	N/A	N/N	N/N	N/A	N/N	N/A	N/N	N/M I	WIN	when a	- fait			

Note: This remediation site was not detrimental to public health, fresh water, animals, plant life, or to properly

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	Contraction of the local division of the loc	NAME AND ADDRESS OF TAXABLE PARTY.												
Sample ID	East Of Leak												Units	NMOCD
Description														Cleanup Levels
Sample Depth (feet bgs)	Surface													
Date	10/10/2017													
						and the second design of the s	and the second se			0110	NI/A	N/A	mg/Kg	TBD
	0000	NIA	NIA	N/A	N/N	N/A	N/N	N/A	N/A	N/N	w/m		an IV a	TRD
Benzene	0000		A1.1A	NIN	NIA	N/N	N/A	N/A	N/N	N/N	N/N	N/N	SN/Sul	
Toluene	<0.050	N/N	N/N	VIN	VIN		1114	NIA	N/N	VIN	N/A	N/A	mg/Kg	180
and the second second	70.050	NIA	N/A	N/A	N/N	N/N	N/A	N/A	VIN	JA			ma Wa	TRD
Etnyinenzene	nonin				NIA	NIN	NIN	N/A	N/N	N/A	N/N	N/N	3N/911	001
Total Xvienes	<0.150	N/N	N/N	N/N	V/N	WINI	when a			VIIV	NI/N	NIA	mg/Kg	TBD
	0000	VIIV	N/N	NIA	NIA	N/A	N/A	N/A	N/A	N/N	WIN		and the second se	NU.
Total BTEX	<0.300	VIN	V/M				0110	NIN	NIN	NIA	NIA	N/N	mg/Kg	180
Chlorido	37.0	N/A	N/N	N/N	N/N	N/A	N/N	V/N	VIN			VIIV	malka	TBD
CINOLUCE			1114	VI V	NI/A	N/N	NIA	N/A	N/A	N/A	N/A	VIN	911/9111	
GRO	<10.0	N/A	N/N	WIN	WIN			110	VI IV	NI/N	N/A	N/A	mg/Kg	TBD
DRO	<10.0	N/A	N/N	N/A	N/A	N/N	N/N	N/N	VIN	- VIN	VIV	NIN	ma/Ka	TBD
EVT DDA	100	N/N	N/A	N/A	N/N	N/N	N/N	N/A	N/N	W/W	I W/N	NJ INI	0.10.1	All

Note: This remediation site was not detrimental to public health, fresh water, animals, plant life, or to property

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	NMOCD Cleanur Levels			TRO	and a	IBU	TBD	TBD	TRU	001	180	TBD	TBD	TBD
	Units			malka	9v/9m	mg/Kg	mg/Kg	mg/Kg	and Wa	Sv /Si II	mg/Kg	mg/Kg	mg/Kg	mg/Kg
				NIIA	N/N	N/A	N/A	N/A	2110	N/N	N/A	N/A	N/A	N/N
				0110	N/A	N/N	N/A	N/A		N/N	N/A	N/A	N/A	N/A
					N/A	N/N	N/A	N/N		N/A	N/N	N/N	N/A	NIA
					N/A	N/A	N/A	N/N	when	N/A	N/N	N/N	N/A	N/N
					N/N	N/A	N/A	NIN	VA	N/N	N/N	N/N	N/A	NIA
NAME AND ADDRESS OF TAXABLE PARTY AND ADDRESS OF TAXABLE PARTY.					N/A	N/A	N/N	VIN	VIN	N/N	N/A	N/A	N/A	N/N
and the second s					N/A	N/A	N/N	NIA	V/M	N/A	N/A	N/N	N/N	NIA
Concerning on the second secon	Sample # X	9'	10/12/2017		N/N	N/A	N/A	VIIV	H/M	N/A	N/A	<10.0	<10.0	100
	Sample # 9	8'	10/12/2017		N/A	N/A	N/N	111	N/N	N/A	N/A	<10.0	<10.0	0.01
	Sample # 4 Sample # 7 Sample # 8 Sample # 9 Sample # X	9'	10/12/2017 10/12/2017 10/12/2017 10/12/2017 10/12/2017		N/A	N/A	N/N		W/N	N/A	N/N	<10.0	<10.0	0011
	Sample # 7	10'	10/12/2017		N/A	N/A	NIA		N/N	N/A	N/N	<10.0	<10.0	0.04
	Sample # 4	10'	10/12/2017		N/A	N/A	VIIV	w/w	N/A	N/A	N/A	100	<10.0	0.01
	Sample ID Description	Sample Depth (feet bgs)	Date		Benzene	Toluono	anono i	Etnylibenzene	Total Xylenes	Total BTEX	Chloride	Cas	Odd	000

Note: This remediation site was not detrimental to public health, fresh water, animals, plant life, or to property

Acronyms:

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V) <u>Re-vegetation Plan:</u>



# SOUTHERN UTE INDIAN TRIBE

SAFETY & ENVIRONMENTAL COMPLIANCE MANAGEMENT GROUP

November 2, 2017

Ms. Amber Groves Remediation Specialist New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88240 agroves@slo.state.nm.us

#### Subject: Frontier Field Services, LLC Revegetation and Noxious Weed Management Plan - Rhombus Union State Com 1 1RP-4671

Dear Ms. Groves,

On behalf of Frontier Field Services, LLC (Frontier), a wholly-owned subsidiary of the Southern Ute Indian Tribe, the following Revegetation and Noxious Weed Management Plan is provided to address revegetation at the Rhombus Union State Com 1 release location.

On April 4, 2017, a release of 10-15 barrels of natural gas liquids was reported at the Rhombus Union State Com 1 located in Lea County, New Mexico. The release originated from a pipeline buried in the right-of-way beneath an existing dirt access road. The total area affected was approximately 2,500 square feet. The release was promptly cleaned up and remediated according to New Mexico Oil Conservation Division (NMOCD) requirements. Frontier is proposing to revegetate the disturbance associated with the remediation at the release site. The area to be revegetated is approximately 200 square feet, and consists of sparsely vegetated, roadside habitat.

#### Seed Mix and Rate

Frontier proposes to use the seed mix and application rates found in Table 1 below.

Common Name	Scientific Name	Pounds of Pure Live Seed per Acre
Sand Bluestem	Anthropogo hallii	0.5
Little Bluestem	Schizachyrium scoparium	0.5
Sideoats grama	Bouteloua curtipendula	1.5
Sand Dropseed	Sporobolus cryptandrus	0.5
Spike Dropseed	Sporobolus contractus	0.5
Mesa Dropseed	Sporobolus flexuosus	0.5
Plains Bristlegrass	Sentaria macrostachya	2.0
Desert or Scarlet Globemallow	Sphaeralcea ambigua or S. coccinea	0.5
Buckwheat	Eriogonum spp.	1.5

Table 1 - Proposed Seed Mix and Application Rates

#### Method and Timing of Dispersal

The release site will be seeded by hand. Mulch will be placed on the re-seeded area to promote successful germination. Frontier plans to seed the area once confirmation samples indicate the soil is below applicable NMOCD cleanup levels. The areas to be reseeded are limited to the bar ditch and road shoulder as the majority of release impacts were within the existing roadway.

#### Monitoring Plan

Frontier plans to monitor the site on a quarterly basis. A sample inspection form is attached to this letter.

#### **Reseeding Plan**

If initial seeding and revegetation are unsuccessful after one growing season, reseeding of the area will be completed.

#### Noxious Weeds

Frontier will document the presence of noxious weeds within the release site during quarterly inspections. If noxious weeds are found on the release site and are listed by the New Mexico Department of Agriculture for control or eradication, they will be managed accordingly.

#### **Final Report**

Upon successful establishment of vegetation (defined as 70% of pre-disturbance vegetative cover), Frontier will prepare a final report detailing seeding and monitoring, and will include pre- and post-reclamation photos of the area.

Should you have any questions regarding this Revegetation and Noxious Weed Management Plan, please contact me at (970) 764-6484.

Respectfully Submitted,

Graham Stahnke, PE Sr. Environmental Compliance Specialist Southern Ute Growth Fund

cc: Harley Everhart, Frontier Field Services, LLC Andy Young, Regulatory Compliance Manager, SUGF Olivia Yu, NMOCD

Encl.

#### FRONTIER FIELD SERVICES, LLC RHOMBUS UNION STATE COM 1 REMEDIATION MONITORING FIELD INSPECTION REPORT

Project Name: Rhombus Union State Com 1 Remediation Project
Inspection Date:
Inspector Names and Titles:
Current Weather:
Current weather.
Any Discharges at time of inspection: Yes No
If Yes, describe:
II Tes, describe.
a investigation to the second s
Description of completed maintenance from previous inspection:
Description & Location(s) of erosion problems or discharges of sediment from the site:
Location(s) of BMPs that need maintenance:
Description & location(s) where additional BMPs are needed at the time of the inspection:
Description & location(3) where additional
Remediation & Reclamation Assessment at the time of inspection:
Weed Control Assessment (description of noxious/invasion weeds on-site) at the time of
weed Control Assessment (description of norious/invasion weeds on site) at the same
inspection:

#### FRONTIER FIELD SERVICES, LLC RHOMBUS UNION STATE COM 1 REMEDIATION MONITORING FIELD INSPECTION REPORT

Other comments/observations:	
INSPECTOR CERTIFICATION	
Qualified Inspector's signature certifying that the project location was thoroughly monitored and observations of the remediation/reclaimed areas were accurately recorded within this inspection report.	
Signature:	
Date	

#### **Everhart, Harley**

From:	Groves, Amber <agroves@slo.state.nm.us></agroves@slo.state.nm.us>
Sent:	Wednesday, November 15, 2017 1:18 PM
To:	Stahnke, Graham
Cc:	Everhart, Harley; Yu, Olivia, EMNRD; Young, Andy
Subject:	RE: 1RP-4671 Rhombus Remediation Project - Revegetation and Noxious Weed
,	Management Plan

#### Good Afternoon, Graham,

Your re-vegetation plan is approved.

Thank you,

#### Amber Groves

**Remediation Specialist** Field Operations Division (575)392-3697 (575)263-3209 cell New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88240



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#### **VI) Conclusion:**

According to NMOCD Guidelines for Remediation of Leaks, Spills, and Releases, the established action levels for constituents of concern for a site ranking of 10: 10 ppm (mg/kg) Benzene, 50 ppm Total BTEX, and 1000 ppm TPH. This remediation is completed in accordance with the enclosed New Mexico Oil Conservation Division (NMOCD) Approved Remediation Plan. The completion of the recent excavation and closure sampling meets NMOCD guidelines and regulations for remediation of the release that occurred on April 02, 2017.

#### VIII)Distribution:

Olivia Yu Environmental Specialist NMOCD District 1 1625 N French Drive Hobbs, NM 88240 O: 575-393-6161x113

Graham Stahnke, PE, ASP Sr. Environmental Compliance Specialist Southern Ute Indian Tribe Growth Fund Safety & Environmental Compliance Management Group 175 Mercado Street Suite 225 Durango, CO 81301

John Prentiss Aka Energy Area Manager 1001 Conoco Road Maljamar, NM 88264 O: 575-676-3500 F: 575-676-2401

Dan Jefferson EH&S Corporate Manager 125 Mercado St., Suite 201 Durango CO, 81301 970-764-6910

Mark Coufal EH&S Manager 125 Mercado St., Suite 201 Durango CO, 81301 970-764-6672

Amber Groves Remediation Specialist Field Operations Division (575)392-3697 (575)263-3209 cell New Mexico State Land Office 2827 N. Dal Paso Suite 117 Hobbs, NM 88240

This concludes this report.

# FIGURE 1 VICINITY MAP



	· · · · · ·	Vicinity I Frontier Field Maljamar Ni	Services			Legend Location
	Revision		Drawn:	DeLorm Xmaps		
By:	Date:	Desct:	Checked:		FRONT	ifr
By:	Date:	Desct:	Approved			field sorvicos, llc southern ute indian tribe
						scorton de l'horan dice

# Figure 2 Site Map



# Figure 3 Chloride Sampling Location

















# Table 1 Released Information and Site Ranking

		FIELD SERVICES 1- Site Ranking			
	Site Rankin	g Determination Table			
Depth to Groundwater	NMOCD Numeric Rank for this Site	Source for Ranking	Notes		
<50 BGS =20	N/A		the nearest ground water is estimated to be greater than		
50' to 99' = 10	10	USGS Topo Maps, Google Earth Elavation Difference from the site and	7500 feet North and North East The well elevation is 4050 feet above sea level and the site is		
>100' =0	N/A		3910 elevation is above sea level		
Ranking Criteria for Horizontal Distance to Nearest Surface Water	NMOCD Numeric Rank for this Site	Source for Ranking	Notes		
<200' =20	N/A				
200' - 100' = 10	N/A	USGS Topo Maps, Google Earth	The Luguna Tonto surface water is 7.9 miles SW of location		
>1000'=0	0				
Ranking Criteria for Horizontal Distance to Water Well or Water Source	NMOCD Numeric Rank for this Site	Source for Ranking	Notes		
<100' from water source? ,200' from a private	0	NM State Engineer Water Well	The nearest well is greater than		
domestic water source? YES OF NO to BOTH. YES = 2-, NO = 0	0	Database	7500' NNW from location		
Total Site Ranking		10			
Soil Remediation Standards	0 to 9	10 to 19	>19		
Benzene	10 PPM	10 10 19 10 PPM	10 PPM		
BTEX	50 PPM	50 PPM	50 PPM		
TPH	5000 PPM	1000 PPM	100 PPM		

# Table 2 Summary of Initial Soil Sampling Results

Aka Energy Group	RP-4671 / Rhombus Union State Com #1	Soil Samulac
	1RP-	

			and the state of t	the second se	A REAL PROPERTY AND ADDRESS OF TAXABLE PARTY.		condition too							
Sample ID	Sample #1	Sample #1   Sample #2	Sample #3		Sample #4   Sample #5	Sample Il6	Sample #7	Commits 110				1		
Description	NE Floor	II wall	NE Wall	NW Wall	M Floor	ME Wall	Helvi WIN	All close	cr wen	Sample #10	Sample #10 Sample #11 Sample X	Sample X MS		
Sample Depth (feet bgs)	3'	251	2 61	2 61				10011 CINI	SE Wall	SW Wall	5 Floor	Floor	1 Locks	NMOCD
	a lan land		C17	ماد	3.	2.5'	2.5'	ŝ	2.5'	2.5'	57	31	STUD	Cloanin Lavale
Date	1102/61/5	5/19/2017	5/19/2017	5/19/2017	5/19/2017	5/19/2017	5/19/2017	5/19/2017	5/19/2017	5/10/2017	E110/2017	e la l'ant		cionan denimona
										I TAN INT IN	ITOPICTIC	1707/67/6		
Benzene	<0.050	00000	-0 nen	-0000	0.000		Concernation of the second	Contractor Development and the second	And and an other designments of the local distance of the local di					
		00000	nen-n-	0000	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	-00E0	AD DED	And a second sec	
Ioluene	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	-0.000	20.050	0.000	non	non	nco'o	mg/kg	180
Fthvihenzene	<0.050	-0 DED	O DED	0.010	00000	nonn	ncn'ns	050.0>	<0.050	<0.050	<0.050	<0.050	mg/Kg	TBD
	nenin	nen'ny	nen-ns	050.05	<0.050	<0.050	<0.050	<0.050	<0.050	-0.050	-0 DEO	0000		
Total Xylenes	<0.150	<0.150	<0.150	<0.150	<0.150	-0.1CO	A TEA	0.10	00000	nenin	000.05	NCU.U>	mg/Kg	TBD
Total DTCV	UNC UT	0000			NOTION .	nct.u	DCT.US	<0.150	<0.150	<0.150	<0.150	<0.150	mp/Ka	TRD
I OLGI DI EA	005.05	<0.300	<0.300	<0.300	<0.300	<0.300	<0.300	0000	0000	0000	0.000		9.19	001
Chloride	1630	3880	176	0 000	9150		-	nne n	nnerns	<0.300	<0.300	<0.300	mg/Kg	TBD
000				1.00.	OCTT	00/TT	48.0	384.0	496	1.500 1	646	336	malla	NOA
GKU	<10.0	<10.0	<10.0	<10.0	<10.0	<10.0	1001-	10.0				000	BN/Bill	180
DRO	285.0	1001	000			0.000	0.01	0'NTS	<10.01>	<10.0	<10.0	<10.0	me/ke	TBD
	0.007	n'nts	00.3	1900	60.6	<10.0	779	1430	1070	104			0.00	
EXT DRO	80.4	<10.0	19.3	AAA	0.45	100			DICY	7.4.7	5.77	998	mg/Kg	TBD
					0.1.0	I N'NTS	480	300	391	23.1	31.7	212	mg/Kg	TBD
										And in the local division of the local divis	and the second s	and the state of t	0. 10.	20.0.

Note: This remediation site was not detrimental to public health, fresh water, animals, plant life, or to property

Table 2

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NMOCD = New Mexico Oil Conservation Division DRO = Diesel Range Organics (C6 - C10) GRO = Gasoline Range Organics (>C10 - C28) EXT DRO = Diesel Range Organics (>C28-C36) TBD = To Be Determined

# Table 3 Summary of Chloride Sampling Results

	Reapeat # 5 NMOCD	4.5' Units Cleanup Levels	17	1 <b>310</b> mg/kg <600	Reapeat # 5	5' Units Cleanup Levels	017	480 mg/kg <600	MMOCD	Units Cleanup Levels		mg/Kg600		Units Cleanup Levels	
	Reapeat #1 Rea	4.5'	11	688	Reapeat #1 Rea	ī	017	1220	Reapeat #1	6'	6/30/2017	848	Reapeat #1	7'	7/6/2017
	10-C	4'	6/27/2017	1040	10-C	4'	6/29/2017	112							
	10-B	2'	6/27/2017	96	10-8	2'	6/29/2017	80							
amples	10-A	Suface	6/27/2017	224	10-A	Surface	6/29/2017	208							
<b>Chloride Soil Samples</b>	6-C	4'	6/27/2017	528	6-C	5	6/29/2017	784	6-C	ŝ	6/30/2017	208			
Chloride Soil Samples	6-B	2'	6/27/2017	432	6-8	2.5	6/29/2017	1440	6-8	2.5	6/30/2017	464			
	6-A	Surface	6/27/2017	864	6-A	Surface	6/29/2017	800	6-A	Surface	6/30/2017	384			
	2-C	5'	6/27/2017	576											
	2-8	2.5'	6/27/2017	112											
	2-A	Surface	6/27/2017	80											
	Sample ID Description	Sample Depth (feet bgs)	Date	Chlorides	Sample ID Description	Sample Depth (feet bgs)	Date	Chlorides	Sample ID Description	Sample Depth (feet bgs)	Date	Chlorides	Sample ID Description	Sample Depth (feet bgs)	Date

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