From: Yu, Olivia, EMNRD
To: "Slade, Rose"
Subject: RE: Summary Reports for ETC Remediation Sites
Date: Tuesday, December 19, 2017 3:58:00 PM

Ms. Slade:

The deferral for 1RP-4328 was approved on September 7, 2017. 1RP-4328 will remain open due to the areas that still need complete delineation and remediation. Documents are already uploaded online.

Thanks,
Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Wednesday, December 13, 2017 12:29 PM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: Summary Reports for ETC Remediation Sites

Good afternoon Ms. Yu,

Please accept my apologies for not emailing this summary report to you yesterday. Per your request please find listed below a summary of open remediation sites with the IRP #'s for ETC requesting approval for closure. I have also attached the final closure reports with signed C-141's for each of the two sites. The A-14 Slug overflow (IRP# 4328) we discussed this and determined that this one site would not require a Final C-141 due to the affected soil left beneath the northern and eastern portions of the secondary containment that exhibit TPH/and of chlorides concentrations above the NMOCD RRAL. The request was subsequently approved, with the caveat that the Remediation Summary and Risk Based Closure Request be modified to include a map that depicts affected soil that is to be remediated at the time of abandonment (TOA). Please reference the attached Remediation Summary and Risk Based Closure Request, which includes a revised "Site and Sample Location Map" depicting the inferred extent of the affected soil remaining in-situ.

1. **A-14 Compressor Station (Below Ground Sump) IRP# 4635**
   a. February 23, 2017, release was discovered at the ETC A-14 Compressor Station, the release was a mixture of crude oil/produced water approximately 5 barrels of fluid was released. The cause of the release was due to an over-run of the below ground sump.
   b. March 6, 2017, a "Proposed Delineation Work-plan" was submitted to the NMOCD and the BLM. ETC received written approval from the NMOCD and the BLM to proceed with the activities outlined in the "Proposed Delineation Work-plan."
   c. March 22 and 23, 2017, TRC on behalf of ETC, collected delineation samples, the soil samples were submitted to and approved laboratory to determine the concentrations of BTEX, TPH, and chlorides. In addition, one background sample BG-11) was collected approximately fifty (50) feet north of the A-14 Compressor Station and submitted to the laboratory for TPH, BTEX, and chloride analysis. A review of the laboratory analytical results indicated benzene, BTEX, TPH, and chloride concentrations were less than

laboratory applicable MDL.

d. May 2, 2017, "Soil Investigation Summary and Proposed Work-plan" was submitted to the NMOCD and the BLM, and on May 16, 2017 received written permission form the NMOCD and the BLM to proceed with the activities outlined in the work-plan.
e. May 23, 2017 TRC commenced excavations activities utilizing a hydro-vac in the vicinity of the A-14 Compressor Station below ground sump.
f. June 15, 2017, following additional excavation occurred.
g. June 19 and 20, 2017 additional excavations occurred. Soil samples were collected from the floor and sidewalls of the excavated areas and submitted to and approved laboratory for BTEX, TPH, and chloride analysis. A review of the laboratory analytical results indicated benzene and BTEX, TPH, and chloride concentrations for the submitted soil samples were less than laboratory MDL and NMOCD regulatory guidelines.
h. July 27, 2017, ETC submitted the Remediation Summary and Permission to Backfill Request for the NMOCD and the BLM.
i. August 7, 2017 ETC received approval to backfill the excavated area from the NMOCD. On September 8, 2017 BLM approved the "Remediation Summary & Permission to Backfill Request".
j. September 20 through 22, 2017, TRC began transporting the excavated soil to Sundance Services, Inc. Approximately 400 cubic yards of excavated soil was transported to the NMOCD approved facility.
k. October 4, 2017 TRC commenced backfill activities at the Release Site. The excavation was backfilled with locally obtained caliche and topsoil and the impacted area was contoured to fit the surrounding topography.
l. October 31, 2017 ETC requested Site Closure for the A-14 Compressor Station (Below Ground Sump) (IRP#4635). Below Ground Sump Closure Request and Final C-141 are attached.

2. **A-14 Compressor Station (Field Scrubber) IRP# 4634**
   a. February 23, 2017 release was discovered at the ETC A-14 Compressor Station, the release was a mixture of crude oil/produced water approximately less than 5 barrels of fluid was released from the field scrubber. The cause of the release was due to a tubing failure.
   b. March 6, 2017, a "Proposed Delineation Work-plan" was submitted to the NMOCD and the BLM. ETC received written approval from the NMOCD to proceed with the activities outlined in the "Proposed Delineation Work-Plan".
   c. March 23, 2017, TRC on behalf of ETC, collected delineation samples, the soil samples were submitted to and approved laboratory to determine the concentrations of BTEX, TPH, and chlorides. In addition, one background sample BG-11) was collected approximately fifty (50) feet north of the A-14 Compressor Station and submitted to the laboratory for TPH, BTEX, and chloride analysis. A review of the laboratory analytical results indicated benzene, BTEX, TPH, and chloride concentrations were less than laboratory applicable MDL.
   d. April 17, 2017, TRC conducted additional vertical delineation activities. Soil samples were collected and submitted to the laboratory for BTEX, TPH, and chlorides analysis.
   e. May 10, 2017, TRC conducted additional vertical delineation activities at the release site.

Soil samples were collected and submitted to the laboratory for BTEX, TPH, and chloride analysis.

f. June 1, 2017, the "Soil Investigation Summary and Proposed Remediation Workplan" was submitted to the NMOCD. The workplan summarized remedial activities and detailed closure strategy.
g. June 9, 2017 ETC received written approval from the NMOCD to proceed with the activities outlined in the workplan.
h. June 13, 2017, TRC commenced excavation activities.
i. June 13, 14, & 15, 2017 soil samples were collected from the floor and the sidewalls of the excavated area. The soil samples were submitted to the laboratory and analyzed for concentrations of BTEX, TPH, and chlorides. A review of the laboratory analytical results indicated all submitted soil samples were below NMOCD regulatory guidelines and no additional excavation activities were warranted.
j. July 27, 2017, ETC submitted the Remediation Summary and Permission to Backfill Request for NMOCD and BLM approval. On August 7, 2017, ETC and TRC representatives met with NMOCD representative to discuss remediation activities at the release site and received approval to backfill the excavated areas, with the exception of the area in the vicinity of the Kinder Morgan High Pressure Natural Gas Pipeline.
k. August 22, 2017, TRC commenced hand digging activities conducted in the vicinity of the Kinder Morgan High Pressure Pipeline. The excavated are a measured approximately 20 feet in length, approximately 10 feet in width, and approximately 6 inches in depth. One confirmation sample was collected from the excavated area and submitted to the laboratory for TPH analysis. A review of the laboratory results indicated TPH concentrations were below NMOCD regulatory guidelines.
l. September 6, 2017, ETC requested NMOCD and BLM approval to backfill the area in the vicinity of the Kinder Morgan High Pressure Pipeline with non-impacted, locally obtained "like" soil.
m. September 8, 2017, BLM approved the "Remediation Summary and Permission to Backfill Request" and the backfill of the excavated area in the vicinity of the Kinder Morgan Pipeline.
n. September 20 through 22, 2017, TRC began transporting the excavated soil to Sundance Services Inc. Approximately 280 cubic yards of excavated soil was transported to the NMOCD approved facility.
o. September 27, 2017, NMOCD approved the backfill of the excavated area in the vicinity of the Kinder Morgan Pipeline.
p. October 4, 2017, TRC commenced backfill activities at the Release Site. The excavation was backfilled with locally obtained topsoil and the impacted area was contoured to fit the surrounding topography. The backfilled area will be reseeded with vegetation approved by the BLM at a later date.
q. October 31, 2017, ETC requested Site Closure for the A-14 Compressor Station (Field Scrubber) IRP# 4634. Field Scrubber Closure Report and Final C-141 are attached.

3. **<u>A-14 Compressor Station (Slug Overflow) IRP#4328</u>**

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.

If you have any questions or concerns, or require additional information, please let me know. Thank you for your assistance & have a great day.

Respectfully,

Rose Slade

Rose L. Slade
Senior Environmental Specialist,
Waste, Water, Remediation
Energy Transfer Partners

O: 210.403.6525
C: 432.940.5147

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Tuesday, December 12, 2017 8:04 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Subject: RE: Meeting

Ms. Slade:

Thanks and the same to you. Have a tranquil holiday season!

Olivia

From: Slade, Rose [mailto:Rose.Slade@energytransfer.com]
Sent: Tuesday, December 12, 2017 6:46 AM
To: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>
Subject: RE: Meeting

Good morning Ms. Yu,

I totally understand and I will email that short summary lists with the IRP#'s before the end of the business day today.

Thank you so much & if I don't talk to you before the Christmas holidays, I wish you and your family the Very Blessed Holiday Season.

Sincerely,
Rose Slade

From: Yu, Olivia, EMNRD [mailto:Olivia.Yu@state.nm.us]
Sent: Tuesday, December 12, 2017 7:26 AM
To: Slade, Rose <Rose.Slade@energytransfer.com>
Subject: RE: Meeting

Good morning Ms. Slade:

I will not be available this week. However, if you send me a list and short summary of 1RPs you would like me to review, I will put them on the top of my to-do list for Monday.

Thanks,

Olivia
Sent from Samsung Mobile

-------- Original message --------
From: "Slade, Rose"
Date:12/11/2017 10:33 (GMT-07:00)
To: "Yu, Olivia, EMNRD"
Subject: Meeting

Good morning Olivia,

Hope you are doing well Ms. Yu. I was hoping my consultants and I could get in a quick visit with you preferably this week if you may have some time Wednesday or Thursday? We have just a few sites that we are trying to close our books on before the end of the year and we shouldn't take up too much of your time maybe 30-45 minutes if your schedule permits?

Please let me know if your available either day and morning or afternoon works for us, if your available.

Thank you so much for all your assistance,

Respectfully,
Rose Slade

Rose L. Slade
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