

L3023 (661)

Memorandum

To: Regional Director -- Southwest Region
Attention: Regional Mineral Coordinator

From: David B. Shaver
Chief, Mining and Minerals Branch
Land Resources Division

Subject: Proposed Scope of Work for Site Characterization of the
Yarborough Pass Production Facility at Padre Island
National Seashore

The Mining and Minerals Branch (MMB) submits the following comments on American Exploration Company's (AMEX) proposed scope of work for site characterization of the Yarborough Pass production facility at Padre Island National Seashore (PAIS). The proposed scope of work involves soil and water sample collection and analysis to determine the extent of potential contamination resulting from oil and gas production operations at Yarborough Pass. The site characterization is essential for reclamation planning purposes.

MMB finds the scope of work to represent a typical investigative approach to define contamination at an oil and gas production site. However, the Yarborough Pass site may present other contamination issues that deserve expanded sampling and testing parameters. We understand that the Water Resources Division and Environmental Quality Division are providing comments on such technical issues.

MMB suggests that PAIS staff play an active role in the selection of soil and water sampling locations. While it is not necessary for PAIS personnel to actually select the sampling locations, National Park Service (NPS) understanding and concurrence of the specific sampling program is essential to protecting the park's interests. As proposed, the site assessment is limited to an 80 x 40 feet area of suspected contamination in and around an earthen pit. A careful visual inspection of the entire production pad may reveal additional areas of suspected contamination. PAIS staff should afford particular attention to the areas where production equipment (e.g., compressors, separators, heater-treaters, tanks, etc.), flowlines, and the warehouse were located. If warranted based on a visual

inspection, the MMB recommends an expanded sampling program to thoroughly define the extent of contamination.

MMB recommends attaching the following stipulations to approval issued for the sampling program:

1. AMEX will provide the NPS with specific sampling locations to the extent possible prior to beginning field sampling and testing. NPS approval of the initial sample locations is required.
2. Any changes or additions to the initial sampling program as necessitated by site conditions or sampling results must be authorized in advance by the authorized NPS representative.

Issues that also deserve attention include mercury and naturally occurring radioactive material (NORM). Old gas-line metering equipment is known to leak mercury and can contaminate soil and water in a large area. The subject scope of work for characterizing contamination should include analyzing the concentration of mercury in soil below and around gas-line "meter boxes." NORM is often found in oil field pipe and equipment and produced water. MMB suggests that the scope of work include assessing the presence of NORM in the pit and any abandoned pipe on the site.

MMB recommends authorizing conduct of the proposed site characterization program under the regulations at 36 CFR §9.38(a)(1) pertaining to "temporary approval" in the absence of AMEX currently operating an approved plan of operations. Temporary approval provisions provide for the acquisition of pertinent information and data necessary to prepare a plan of operations. Issuing AMEX temporary approval to conduct the site characterization investigation at Yarborough Pass will expedite the acquisition of important information necessary to protect park resources.

Following completion of the site characterization, AMEX should prepare a comprehensive reclamation plan for the Yarborough Pass production site as a supplement to an approved plan of operations covering all AMEX operations in PAIS. We understand that PAIS staff are currently evaluating the AMEX plan of operations for all production operations in the park, and anticipate that the plan will be approved in 60 to 90 days.

Thank you for the opportunity to comment on the subject document. If you have any questions, or if we can be of further assistance, please contact Pat O'Dell or Kean Boucher of my staff at (303) 969-2093.

cc:

PAIS: Superintendent

bcc:

MMB-DEN: Higgins/Woods/McCoy/Project and Reading File

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