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HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL ASSESSMENT

JUN 05 2009

CERTIFIED – RETURN RECEIPT REQUESTED (7004.2510 0005 5770 7514)

Mr. Randy Harris
Safety Environmental Specialist
EnerVest Operating L.L.C.
P.O. Box 219
Fairbanks, LA 71240

RE: No Further Action Notification
EnerVest Operating L.L.C.; AI Number (149272)
Mercury Meters Remediation Program
First Remediation Set, Statewide, LA

Dear Mr. Harris:

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has completed its review of your Closure Documentation For Remediation Work At Former Mercury Meter Measuring Stations, dated February 12, 2009 for the referenced areas of investigation (Table 2) located within the State of Louisiana. Based on our review of this document (ID# 40476146), field inspections and all previously submitted information, we have determined that no further action is necessary at this time for the 44 listed sites. This NFA-ATT covers only the listed sites and does not close out the AI file. Additional sites are still being evaluated. The Basis of Decision for this notification is attached.

If you have any questions or need further information, please contact Mr. William H. Schramm at 225-219-3403. Thank you for your cooperation in addressing this issue.

Sincerely,

A handwritten signature in cursive script that reads "Keith L. Casanova".

Keith L. Casanova, Administrator
Remediation Services Division

Attachments: Table 2 (EnerVest), FIFs

c: Imaging Operations - GW
William H. Schramm

BASIS OF DECISION FOR NO FURTHER ACTION

EnerVest Operating LLC
AI# 149272
Statewide Mercury Program

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has determined that the 44 sites listed in Table 2, require No Further Action At This Time.

The properties were previously used as metering facilities for statewide natural gas production, collection or transportation from 1930's to present. These sites are typically small footprint uncontrolled locations on which a pipe-run, shed or tower was placed to manage/meter the flow of natural gas. Little if any other activity takes place other than recording gas flow; calibration of meters or minor maintenance. These sites have been either converted to mercury free meters (dry-flow) or taken out of service. The property may remain in service or, if abandoned, it is returned to a natural state once it meets the non-industrial RECAP Screening Limit for soils.

The 44 Areas of Investigation (Sites) were closed in accordance with the RECAP Screening Standard for non-industrial soils of 2.3 ppm of mercury. Because all mercury meters and contaminated soils have been removed at these locations, there is no potential for new releases.

The media impacted by these constituents is soil only.

Remedial actions include meter removal and soil excavation. Confirmatory samples at the excavation perimeter and bottom were analyzed. Excavation continued until all sidewalls and the bottom achieved RECAP limits. Contaminated soil was properly profiled and disposed in a permitted facility. In total, approximately 149.05 cubic yards of soil were disposed at Waste Management Magnolia Landfill in Monroe, LA. No Further Action At This Time is granted when contamination is reduced to the extent necessary to achieve the established standards.

Some of these sites are located on operating property and have fenced boundaries or other security measures, others have no institutional controls. No monitor wells were installed during these investigation or remediation activities. No IDW remains onsite.

TABLE 2
CONFIRMATION SAMPLING ANALYTICAL RESULTS

Final Confirmation Sampling Results - Total Mercury (mg/kg)														
AOI Identifier	Latitude	Longitude	S1			S2			S3			S4 West Sidewall	S5 Base	Duplicate Samples
			North Sidewall	East Sidewall	South Sidewall	North Sidewall	East Sidewall	South Sidewall	North Sidewall	East Sidewall	South Sidewall			
A2538	32.64405	-92.06348	0.0810	0.1080	0.1720	0.0467	0.0194	NSC						
A2710	32.6427	-92.0645	< 0.0188	0.0263	0.0202	0.0654	0.0271	NSC						
A2711	32.6434	-92.06733	0.5450	0.6750	1.5200	0.4580	0.0738	NSC						
A2721	32.64438	-92.08007	0.0418	0.3230	0.1720	0.1600	0.1180	S1D 0.0599						
A2722	32.64605	-92.08612	0.0273	0.2800	1.4300	1.4600	0.0868	S1D 0.1200						
A2723	32.66774	-92.13772	0.5310	0.7680	0.3460	1.6600	1.0500	S1D 0.3330						
A2724	32.66774	-92.13772	0.7660	0.3280	0.6860	0.7060	0.8350	NSC						
A2725	32.67023	-92.13676	0.2390	0.2360	1.6000	0.2010	0.5450	S4D 0.1880						
A2726	32.66474	-92.12656	0.0658	0.0490	0.0353	0.0534	0.0865	S5D 0.0528						
A2727	32.66269	-92.132271	0.0565	0.2090	0.3130	0.1530	0.1850	S1D 0.0601						
A2728	32.66269	-92.132271	0.6890	0.6610	1.3900	0.8320	0.3960	NSC						
A2729	32.66145	-92.13610	1.1100	0.0577	0.5010	0.4740	0.1280	S1D 1.3900						
A2730	32.64537	-92.1328	0.1550	0.4690	1.8800	1.0200	0.1640	NSC						
A2731	32.64537	-92.1328	0.3220	0.9550	0.0682	0.9340	0.3400	NSC						
A2733	32.63744	-92.12821	0.8180	0.9550	0.6730	0.1320	0.1540	NSC						
A2734	32.63824	-92.12553	0.1600	0.6330	0.0659	0.5980	0.2770	NSC						
A2735	32.64683	-92.12478	0.1070	0.3720	0.1670	0.0919	0.0990	NSC						
A2736	32.63804	-92.11744	0.0518	0.0430	0.0400	0.0455	0.0419	NSC						
A2737	32.63778	-92.11140	0.0842	0.0812	0.0766	0.1350	0.0568	S4D 74.1000						
A2738	32.63732	-92.09996	1.0200	2.0200	0.2630	0.2150	1.1800	NSC						
A2739	32.60720	-92.09997	0.1650	0.1540	0.1140	0.0709	0.0223	NSC						
A2740	32.60740	-92.09590	0.3100	0.8940	0.2820	0.8570	0.1030	NSC						
A2741	32.58770	-92.08285	0.2650	0.0534	0.0692	0.0396	0.0904	NSC						
A2743	32.60805	-92.05780	1.5400	1.9500	1.8300	0.4170	0.3950	S1D 1.4300						
A2744	32.61268	-92.05923	0.0715	0.1130	0.0501	0.1530	0.2130	NSC						
A2745	32.64337	-92.06733	0.0743	0.2650	0.1440	0.8360	0.5760	NSC						
A2746	32.64357	-92.06735	1.2400	0.1690	0.0468	0.1250	0.0907	NSC						
G0243	32.6435	-92.0673	0.0316	1.0400	0.9680	1.7800	0.3430	NSC						
G0244	32.6434	-92.0673	0.9400	0.4300	0.6350	1.9100	0.6530	NSC						
T0009	32.63496	-92.08709	0.0646	0.0051	0.0092	0.0174	0.0241	NSC						
T0010	32.63581	-92.08360	0.2060	0.0224	0.3070	0.3920	0.0372	NSC						
A2757	32.63531	-92.12132	0.7980	0.0754	0.5220	0.2660	0.0267	NSC						

NSC - No Sample Collected
 * All sample locations where duplicates exceeded 2.3 mg/kg were considered interim samples. These locations were revisited, remediated, and resampled until the state action level was achieved.

Final Confirmation Sampling Results - Total Mercury (mg/kg)

AOI Identifier	Latitude	Longitude	S1		S2		S3		S4		S5 Base	Duplicate Samples
			North Sidewall	East Sidewall	South Sidewall	West Sidewall	West Sidewall	West Sidewall				
06530	32.68590048	-92.1458200	0.0665	0.1080	0.0712	1.6800	0.0914	0.0914	S3D 0.0302	NSC		
C1031	32.6814	-92.0466	0.5470	0.3840	0.8660	0.3040	0.5530	0.5530	S1D 0.0191	NSC		
C1032	32.68141	-92.0466	< 0.0200	1.6700	< 0.0182	< 0.0182	< 0.0171	< 0.0171	S4D 0.0512	NSC		
C1033	32.6738	-92.1038	0.1480	0.4560	0.1950	0.0831	0.7140	0.7140	S4D < 0.0194	NSC		
C1043	32.64789	-91.98948	< 0.0194	< 0.0200	< 0.0194	< 0.0200	< 0.0188	< 0.0188	S4D < 0.0194	NSC		
C1044	32.56030	-92.04069	0.9840	0.0219	< 0.0182	< 0.0188	0.0676	0.0676	S1D 0.0779	NSC		
C1045	32.56668	-92.04068	0.0662	0.9870	0.1720	0.0241	0.1350	0.1350	S3D 0.1060	NSC		
C1048	32.54645	-92.01910	0.2840	0.0577	0.0236	0.0410	0.0301	0.0301	S3D 0.1060	NSC		
C1049	32.56683	-91.99827	0.0928	0.0629	0.0604	0.0956	0.0948	0.0948	S3D 0.1060	NSC		
C1050	32.57345	-92.05056	< 0.0200	< 0.0182	0.0337	0.0632	0.0222	0.0222	S3D 0.1060	NSC		
C1052	32.65812	-92.03197	0.0456	0.0476	0.0423	0.0592	0.9420	0.9420	S3D 0.1060	NSC		
C1058	32.66115	-92.08118	0.1100	0.3280	0.0275	0.0521	0.0502	0.0502	S3D 0.1060	NSC		

Total Reported: 44

NSC - No Sample Collected
 * All sample locations where duplicates exceeded 2.3 mg/kg were considered interim samples. These locations were revisited, remediated, and resampled until the state action level was achieved.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 149272 INSPECTION DATE: 7/29/08 TIME OF ARRIVAL: 2:30 PM
 ALTERNATE ID#: _____ DEPARTURE DATE: 7/30/08 TIME OF DEPARTURE: 3:30 PM
(ID Type/Number)
 FACILITY NAME: Benevent PH #: _____
 LOCATION: Mohave Gas Field

RECEIVING STREAM (BASIN/SUBSEGMENT): _____ PARISH NAME: Various in State

MAILING ADDRESS: P.O. Box 219 Fairbanks LA 71240
(Street/P.O. Box) (City) (State) (ZIP)

FACILITY REPRESENTATIVE: Andy Harris TITLE: Owner
 FACILITY REPRESENTATIVE PHONE NUMBER: 318-665-4506
 NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): _____

INSPECTION TYPE: BBM PROGRAM INVOLVED: AIR _____ WASTE _____ WATER _____ OTHER _____

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

Visited 9 meter locations in Ouachita Parish & sampled for Hg. One additional meter was not an Benevent meter. Observed field sampling procedures. One meter had visible Hg beneath meter box. All operations were appropriate & well done.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?
_____	X	YES NO
_____		YES NO

PHOTOS TAKEN: YES NO SAMPLES TAKEN: YES NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: Randy Harris
 PRINT NAME: Randy Harris
 (NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): W. Schramm CROSS REFERENCE: _____
Erin Fiske / Steve Archibald ATTACHMENTS: _____
 REVIEWER: _____

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
FIELD INTERVIEW FORM**

AGENCY INTEREST#: 149272 INSPECTION DATE: 7/23-24/08 TIME OF ARRIVAL: _____
 ALTERNATE ID#: _____ DEPARTURE DATE: 7/24/08 TIME OF DEPARTURE: _____
(ID Type/Number)
 FACILITY NAME: Envest PH #: 318-
 LOCATION: Fairbanks LA

RECEIVING STREAM (BASIN/SUBSEGMENT): _____ PARISH NAME: Various

MAILING ADDRESS: P.O. Box 2619 Fairbanks LA 7124
(Street/P.O. Box) (City) (State)

FACILITY REPRESENTATIVE: Randy Harris TITLE: Mgr.
 FACILITY REPRESENTATIVE PHONE NUMBER: _____

NAME, TITLE, ADDRESS and TELEPHONE of RESPONSIBLE OFFICIAL (if different from above): _____

INSPECTION TYPE: APM PROGRAM INVOLVED: AIR WASTE WATER OTHER

INSPECTOR'S OBSERVATIONS: (e.g. AREAS AND EQUIPMENT INSPECTED, PROBLEMS, DEFICIENCIES, REMARKS, VERBAL COMMITMENTS FROM FACILITY REPRESENTATIVES)

Visited numerous water locations around Houma LA
to sample for Hg. All field ops went well.
3 sites had visible Hg. Sampled additional 23 sites.

AREAS OF CONCERN:

REGULATION	EXPLANATION	CORRECTED?	
		YES	NO
_____		YES	NO
_____		YES	NO

PHOTOS TAKEN: YES NO SAMPLES TAKEN: YES NO (Attach Chain-of-custody)

RECEIVED BY: SIGNATURE: Randy Harris

PRINT NAME: Randy Harris
 (NOTE: SIGNATURE DOES NOT NECESSARILY INDICATE AGREEMENT WITH INSPECTOR'S STATED OBSERVATIONS)

INSPECTOR(S): W. Schuman CROSS REFERENCE: _____
Steve Beckwith ATTACHMENTS: _____

REVIEWER: _____

NOTE: The information contained on this form reflects only the preliminary observations of the inspector(s). It should not be interpreted as a final determination by the Department of Environmental Quality or any of its officers or personnel as to any matter, including, but not limited to, a determination of compliance or lack thereof by the facility operator with any requirements of statutes, regulations or permits. Each day of non-compliance constitutes a separate violation of the regulations and/or the Louisiana Environmental Quality Act.