

CORRESPONDENCE

MISC.



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

November 30, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-179

Mr. Sam Small
Amerada Hess Corporation
P.O. Box 840
Seminole, Texas 79360

**RE: CAPROCK DISPOSAL SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amerada Hess Corporation's (AHC) September 27, 1994 "CAPROCK DISPOSAL SITE" and August 4, 1994 "PIT REMEDIATION AND CLOSURE REPORT" for the AHC's Caprock (Bagtower) landfill. These documents contain the results of AHC's remedial/closure actions conducted at AHC's Caprock Disposal Site southeast of Caprock, New Mexico.

The OCD approves of the remedial/closure actions as documented in the above referenced reports with the following conditions:

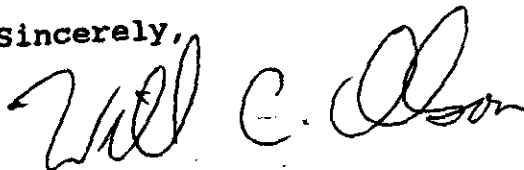
1. Prior to disposal of the wastes in the three (3) overpack drums stored at the Monument Campsite, AHC will submit the proposed disposal site to the OCD for approval. If the wastes are to be disposed as non-hazardous wastes, AHC will also supply the OCD with an analysis of the hazardous characteristics of the wastes.
2. AHC will notify the OCD at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
5. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs Office.

Mr. Sam Small
November 30, 1994
Page 2

Please be advised that OCD approval does not relieve AHC of liability if remaining contaminants are found to pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve AHC of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office
Benito Garcia, Bureau Chief, NMED Hazardous and Radioactive
Materials Bureau

P 667 242 179	
Certified Mail Receipt No Insurance Coverage Provided Do not use for International Mail (See Reverse)	
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Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

Fold at line over top of envelope to the right of the return address.

AMERADA HESS CORPORATION

OIL CONSERVATION DIVISION
RECEIVED

94 OCT 3 AM 8 52

P. O. BOX 840
SEMINOLE, TEXAS 79360
915-758-6700

September 27, 1994

New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Bldg.
Santa Fe, New Mexico 87504

Attn: Mr. Williams C. Olson

Re: Caprock Disposal Site
Lea County, New Mexico

Dear Mr. Olson:

This letter will address the items of concern in your letter of Sept. 21, 1994.

- Item 1: Samples CAP NE-1, CAP NW-2, CAP C-3, CAP SE-4 and CAP SW-5 were all obtained from depths of 6-8 inches below the pit surface after the waste was removed from the pit. Only sample CAP C-3 was taken from the bottom (lowest point) of the excavated pit. The other samples were composite samples taken from the pit walls and at ground level at the pit corners (NE, SE, NW, SW).
- Item 2: Samples CAP NE-1A, CAP C-3A and CAP SE-4A are composite samples taken after dilution and represent final contaminant levels. These samples were taken from the areas where the original contamination levels exceeded 1000 ppm TPHC.
- Item 3: Please refer to the attached correspondence with Mr. Price dated May 5, 1994. Although no written approval was received, the letter was a confirmation of verbal approval by Mr. Price.
- Item 4: The 10 foot depth is the depth to which the pit was excavated.
- Item 5: Regarding the disposal of the material in question, again, please refer to the attached correspondence between Carter & Burgess and Jerry Sexton, and Robert L. Williams and Jerry Sexton and Wayne Price. This material is currently onsite at the Monument Campsite pit location waiting to be disposed of. Tentative plans call for disposal of this material by Safety-Kleen Corp. No date for disposal has been arranged at this time.

I hope this will satisfy your concern. If not please contact me at 915/758-6741.

A handwritten signature in black ink, appearing to read 'Sam Small', with a stylized, cursive script.

Sam Small
Environmental Coordinator

SS/ra

xc: K. Krier w/o attachments
R. Williams w/o attachments

AMERADA HESS CORPORATION

P. O. DRAWER "D"
MONUMENT, NEW MEXICO 88265

May 5, 1994

New Mexico Oil Conservation Division
Attn: Mr. Wayne Price
Post Office Box 980
Hobbs, New Mexico 88240

RE: Bagtower (Caprock) Trash Pit Closure

Dear Mr. Price:

As per your request I am informing you of our intent to remove waste material from the Bagtower site.

We plan to proceed with the removal of waste material in the manner of which I had previously discussed with you.

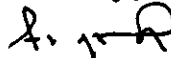
WASTE MATERIAL REMOVAL

- ° Scrap metal will be sold to Permian Metals of Odessa, Texas.
- ° Wood, rubber and all other materials will be transported by Waste Management of New Mexico to the Hobb's Land Fill.

All of the waste material will be disposed of according to the Generators Waste Profile Sheet.

If you have any questions or need further explanation regarding the waste removal, please contact me at (505) 393-0087.

Sincerely,



Al Young
Sr. Production Foreman
Monument District

AY:tlh
xc: Rob Williams
Sam Small
Walter Rackley

AMERADA HESS CORPORATION

P. O. BOX D
MONUMENT, NM 88265-0052
505-383-2144

March 7, 1994

New Mexico Oil Conservation Division
P.O.Box 1980
Hobbs, New Mexico 88240

Attn: Jerry Sexton - Director Hobbs Division NMOCD
Wayne Price - Environmental Engineer NMOCD

Re: Bagtower Campsite Pit Closure Meeting - March 1, 1993, movement of materials
in sealed drums to the Monument site.

Dear Sirs:

As discussed, Amerada Hess Corporation (AHC) acknowledges that the NMOCD should have been notified prior to our transporting three (3) sealed drums containing materials removed from the Bagtower pit to the Monument Campsite pit location. Waste characterization indicates non-hazardous quantities and AHC intends to handle and properly dispose of the materials as stated in the AHC October 5, 1993, " Phase II Proposal for Caprock and Monument Landfills ", and approved and amended by NMOCD October 26, 1993.

The Carter-Burgess memorandum documenting the material movement is attached. Our apologies for the inconvenience.



Robert L. Williams Jr.
Monument District Superintendent

attachments: Carter-Burgess memo. (March 2, 1994)

xc: Sam Small
Al Young
Ken Davis - Carter- Burgess
J.D. McNamera - Carter- Burgess
John Tymkowych - State of New Mexico Environmental Dept.,
P.O.Box 26110
Santa Fe, New Mexico 87502



Carter & Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

March 2, 1994

Mr. Rob Williams
Amerada Hess Corporation
Drawer D
Monument, New Mexico 88265

RE: TRANSMITTAL LETTER - LETTER TO OCD REGARDING MOVEMENT OF WASTES
FROM CAPROCK TO MONUMENT REMEDIATION SITES

Dear Mr. Williams:

Enclosed herewith you will find the original letter to Jerry Sexton of OCD in Hobbs regarding the referenced waste movement. Also, we have enclosed two carbon copies for your files.

If you need any further information, please feel free to contact me.

Sincerely,

CARTER & BURGESS, INC.

Kenneth L. Davis, P.E.
Associate Principal
Midland Branch Manager

enclosures



Consultants in Engineering, Architecture,
Planning and the Environment

March 2, 1994

Mr. Jerry Sexton
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88240

RE: Transfer of Wastes, Monument and Caprock Landfill Remediation Projects for
Amerada Hess Corporation

Dear Mr. Sexton:

At your request, I am writing this letter to document the background to, and events of February 25, 1994 regarding the transfer of miscellaneous wastes from the Caprock remediation site to the Monument remediation site as a part of our ongoing work on the referenced project.

As you know, Carter & Burgess, Inc., has been managing the remediation work at the Caprock site for about 10 days. Our general task is to remove and segregate all surface wastes in the landfill according to waste type and potential hazardous waste determination. The disposition of all wastes is to be determined as well, and soil samples are to be taken from the bottom of each excavation to determine if unacceptable levels of contamination are present.

During the course of this work, several wastes were located that were in leaking or open containers. These containers contained the following:

1. One fifty-five (55) gallon drum contained approximately five (5) inches of an undetermined oily material. This would correspond to 7-9 gallons of this material. Visual and olfactory inspection indicated that this material is likely to be heavy lubrication oil.
2. One fifty-five (55) gallon drum contained roughly one (1) inch of an undetermined oily material. This would correspond to 1-2 gallons of this material. Visual and olfactory inspection indicated that this material is probably an oil or has some oil constituents.
3. Three empty buckets of pipe dope were found, one of which had a label

indicating that it contained inorganic lead. These buckets had some residual amounts of what appears to be pipe dope in them.

4. Three partially filled five-gallon buckets were found. These buckets contained amounts of what appeared to be a light lubricating grease.
5. One empty one gallon paint can was found.

These items were placed into three overpack drums to prevent spillage. This process was completed on the evening of Friday, February 25th.

Because of concerns over leaving these items unattended at such a wide-open site with cattle and local residents in the area, our project manager, Mr. J.D. McNamara, made the decision to move the wastes to the Monument site, where they could more easily be secured. These wastes were moved on that day.

On Monday, as a part of a routine progress report to Mr. Wayne Price of the OCD, Mr. McNamara reported that he had moved the wastes to more effectively protect them at the Monument site.

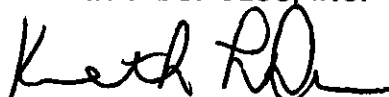
Upon hearing this report, Mr. Price called a meeting of the interested parties to discuss the incident. The meeting was held on Tuesday, March 1, at the Hobbs OCD office. Meeting attendees were Messrs. Rob Williams and Al Young representing Amerada Hess Corporation, Messrs. Wayne Price and Jerry Sexton of the Hobbs OCD office, and Mr. J.D. McNamara and myself representing Carter & Burgess, Inc.

After discussing the matter at this meeting, the group reconvened at the Monument site, where Messrs. Sexton and Price inspected the material in question. At this time, it was determined that a letter should be written to Mr. Sexton documenting the movement of the waste. In addition, Carter & Burgess personnel were instructed to contact the case worker for the New Mexico Environment Department in Santa Fe to inform him of the events. This was accomplished later that day when I spoke by telephone with Mr. John Tymkowych of the NMED, who acknowledged the activity, expressed understanding of the necessity of this field decision, and asked that he be copied on this documenting letter.

It is our understanding from Messrs. Tymkowych, Price and Sexton that this matter is now closed. We certainly appreciate your help with this matter. We look forward to continuing our excellent working relationship with you on this and other projects in the future. To that end, if you need any further information or clarification, please do not hesitate to contact me.

Sincerely,

CARTER & BURGESS, INC.



Kenneth L. Davis, P.E.
Midland Branch Manager

cc: Mr. John Tymkowych
New Mexico Environment Department



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 21, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-174

Mr. Sam Small
Amerada Hess Corporation
P.O. Box 840
Seminole, Texas 79360

**RE: CAPROCK DISPOSAL SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing Amerada Hess Corporation's (AHC) August 4, 1994 "PIT REMEDIATION AND CLOSURE REPORT" for the AHC's Caprock (Bagtower) landfill. This document contains the results of AHC's remedial actions conducted at AHC's Caprock Disposal Site southeast of Caprock, New Mexico.

The OCD has the following comments, questions and requests for information regarding the above referenced document:

1. It is not clear what the sample results for samples CAP NE-1, CAP NW-2, CAP C-3, CAP SE-4 and CAP SW-5 represent. Do these samples represent the initial contaminant levels taken from 6-8 inches below the original ground surface or the final contaminant levels taken from 6-8 inches below the bottom of the excavation? Please clarify what these samples represent. ✓
2. It is not clear what the sample results for samples CAP NE-1A, CAP C-3A and CAP SW-4A represent. Do these samples represent the final contaminant levels of the excavated soils after dilution? Please clarify what these samples represent. ✓
3. The OCD has no record of providing an approval for the offsite disposition of waste materials from the site. Please provide the OCD with this information.

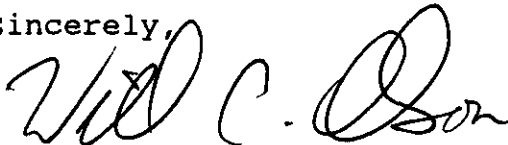
Mr. Sam Small
September 21, 1994
Page 2

4. The pit is listed as having a 10 foot depth. Is this the depth to which the landfill area was excavated or the depth to which materials had been landfilled in the past? Please clarify what this depth represents. ✓
5. AHC's "ENVIRONMENTAL ASSESSMENT OF CAPROCK DISPOSAL SITE" which was received by OCD on March 29, 1993 identified at least one drum and possibly others on the site as containing liquid wastes. AHC's October 5, 1993 "PHASE II PROPOSAL FOR CAPROCK AND MONUMENT LANDFILLS", which was conditionally approved by OCD on October 26, 1993, contained work elements for characterizing any liquid wastes, triple-rinsing drums or containers and proper disposal of rinsate based upon a determination of their hazardous characteristics. However, the report submitted contains no information about these work elements. Please provide the OCD with information regarding completion of these work elements.

Please send the above information to the OCD Santa Fe Office with a copy provided to the OCD Hobbs Office.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office
Benito Garcia, Bureau Chief, NMED Hazardous and Radioactive
Materials Bureau

P 111 334 174

**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
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P.O., State and ZIP Code	
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Special Delivery Fee	



Carter & Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

ENVIRONMENTAL CONSERVATION DIVISION
RECEIVED

MAR 25 AM 8 39

B:11,
FYI
J.D.

March 22, 1994

Mr. John Tymkowych
State of New Mexico Environmental Dept.
P.O. Box 26110
Santa Fe, New Mexico 87502

Subject: Amerada Hess Caprock and Monument Soil Sampling

Dear Mr. Tymkowych:

On March 15, attempts were made to obtain soil samples at a five foot depth at both the Caprock and Monument disposal sites. The equipment used was a gasoline powered, trailer mounted, Dig-R-Mobile with a six inch auger. Due to the extremely rocky conditions, we were unable to drill past the 8"-10" depth.

Per our phone conversation on March 21, we would like to propose the following sampling plan for your consideration:

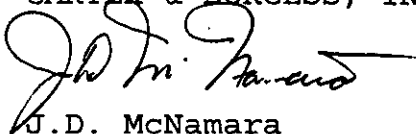
Caprock - Five composite samples would be obtained from within the perimeter of the pit walls where the surface waste was removed. These samples would be from a five-spot grid pattern consisting of the four quadrants and the center of the pit area. Each composite sample would be made up from four grab samples in the area of the sampling point at a depth of 8"-10".

Monument - Five composite samples would be obtained from within the perimeter of the pit walls where the surface waste was removed. These samples would be from a five-spot grid pattern consisting of the four quadrants and the center of the pit area. One composite sample would be taken from the mound area just east of the pit, and three composite samples would be taken from the area south of the excavated part of the pit where the drums of material were stored. Each composite sample would be made up from four grab samples in the area of the sampling point at a depth of 8"-10".

We appreciate your consideration of this matter and will proceed with the sampling per your decision. If you have any questions please call.

Sincerely,

CARTER & BURGESS, INC.

A handwritten signature in dark ink, appearing to read "J.D. McNamara", written over the typed name.

J.D. McNamara
Project Manager

xc: Sam Small - Amerada Hess Corporation
William C. Olson - New Mexico OCD, Santa Fe
Wayne Price - New Mexico OCD, Hobbs

Submit 3 Copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-103
Revised 1-1-89

DISTRICT I
P.O. Box 1980, Hobbs, NM 88240

DISTRICT II
P.O. Drawer DD, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

WELL API NO.	N/A
5. Indicate Type of Lease	N/A STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No.	N/A
7. Lease Name or Unit Agreement Name	
N/A	
8. Well No.	N/A
9. Pool name or Wildcat	N/A
10. Elevation (Show whether DF, RKB, RT, GR, etc.)	
4238	

SUNDRY NOTICES AND REPORTS ON WELLS
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A
DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT"
(FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: OIL WELL <input type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER Landfill	2. Name of Operator Amerada Hess Corporation
3. Address of Operator P.O. Box 840 Seminole, Texas 79360	4. Well Location Unit Letter N/A : 60 Feet From The South Line and 2580 Feet From The East Line Section 11 Township 12 South Range 33 East NMPM Lea County

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data	12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.
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NOTICE OF INTENTION TO:	SUBSEQUENT REPORT OF:
PERFORM REMEDIAL WORK <input checked="" type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>
OTHER: <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
	CASING TEST AND CEMENT JOB <input type="checkbox"/>
	OTHER: <input type="checkbox"/>

Segregate and perform waste characterization analysis on all surface waste at the subject landfill. Dispose of non-hazardous surface materials (excluding soils) within the limits specified. Provide soil analysis after removal of surface waste to determine if further remediation is required, and recommend an appropriate course of action. All work to be performed in accordance with the Scope of Work outlined in Exhibit A and B of contract between Carter & Burgess and Amerada Hess Corporation.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Samuel W. Small TITLE Environmental Coord DATE 2/15/94

TYPE OR PRINT NAME Samuel W. Small, P.E. TELEPHONE NO. (915) 758-6741

(This space for State Use)

APPROVED BY Paul J. King TITLE Geologist DATE FEB 15 1994

CONDITIONS OF APPROVAL, IF ANY: FOR RECORD PURPOSE ONLY



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

0815

Date

2/17/94

Originating Party

Bill Olson - Envir. Bureau

Other Parties

Ken Davis - Carter & Burges

SUBJECT

Caprock & Monument Sites of Amerada Hess Corp.

Discussion

I requested copy of NMED Haz-waste approval of work plans.
I requested that they send copies of all Santa Fe correspondence to Wayne Rice.
Told me they sent copy of work safety plan to Wayne Rice for approval.
I requested copy of health & safety plan, and told him to copy Santa Fe
on all correspondence with District.

They will do Caprock site next week and Monument site the
week of 2/28

Conclusions or Agreements

They will send health & safety plan & NMED Haz-waste approval

Distribution

Caprock file } Amerada Hess
Monument file }
Wayne Rice - OCO Hobbs

Signed

Bill Olson



Carter & Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

February 11, 1994

Mr. William C. Olson
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

RECEIVED

FEB 21 1994

**OIL CONSERVATION DIV.
SANTA FE**

Dear Mr. Olson:

Per your request on February 17, 1994, I am forwarding a copy of the site specific Safety and Health Plan for the remediation of Amerada Hess Corporation's Caprock and Monument sites. I am also enclosing a copy of the letter of concurrence from Mr. Edward L. Horst of the New Mexico Environment Department.

We appreciate the assistance that the OCD has afforded us on this project. If you have any comments or questions please call anytime.

Sincerely,

CARTER & BURGESS INC.

Kenneth L. Davis, P.E.
Associate Principal
Midland Office Manager

cc: Sam Small, Amerada Hess



Consultants in Engineering, Architecture,
Planning and the Environment

ST FE 8 35

February 11, 1994

Mr. William C. Olson
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

Dear Mr. Olson:

Thank you for your review of Amerada Hess Corporation's October 5, 1993 "Phase II Proposal for Caprock and Monument Landfills" submitted on their behalf by Carter & Burgess, Inc. In compliance with your review, this letter is to provide official notice to the OCD that we are scheduled to begin the first phase of this remediation program on February 21, 1994.

Our work plan calls for the segregation and removal of all surface wastes from the pits, and begin waste characterizations on these waste materials. We will start on the waste pile at the Caprock location and proceed on the Monument location upon completion of each phase.

I have notified Mr. Wayne Price in your Hobbs office of this project and would like to coordinate all operations through him if this is acceptable with you. I will forward a copy of this letter to him for his concurrence.

We appreciate the assistance that the OCD has afforded us on this project. If you have any comments or questions please call anytime.

Sincerely,

CARTER & BURGESS, INC.

A handwritten signature in dark ink, appearing to read 'Kenneth L. Davis'.

Kenneth L. Davis, P.E.
Associate Principal
Midland Office Manager



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

November 16, 1993

Mr. Kenneth L. Davis, P.E.
Branch Manager
Carter - Burgess
505 North Big Spring
Suite 600
Midland, Texas 79701-4367

RECEIVED

FEB 21 1994

OIL CONSERVATION DIV.
SANTA FE

SUBJECT: PHASE II PROPOSAL FOR CAPROCK AND MONUMENT

Dear Mr. Davis:

Hazardous and Radioactive Materials Bureau (HRMB) has completed its review of your October 5, 1993 letter covering the captioned subject. HRMB concurs with your approach to remediate the disposal sites at Caprock and Monument, however, the samples that are to be taken are not to be taken as composite samples. All analytical work will be performed with an EPA approved testing method and all results will be provided to this agency. Once each project is complete, please provide HRMB with a final report.

If there are any questions please contact me at (505) 824-4308.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward L. Horst", written over a horizontal line.

Edward L. Horst, Program Manager
RCRA Inspection/Enforcement Section

xc: William C. Olson, OCD



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

October 26, 1993

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-402

Mr. Sam Small
Amerada Hess Corporation
P.O. Box 840
Seminole, Texas 79360

**RE: CAPROCK AND MONUMENT DISPOSAL SITES
LEA COUNTY, NEW MEXICO**

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amerada Hess Corporation's October 5, 1993 "PHASE II PROPOSAL FOR CAPROCK AND MONUMENT LANDFILLS" which was submitted on behalf of Amerada Hess by their consultant, Carter & Burgess, Inc. This document contains recommendations for additional work related to the Amerada Hess's Caprock Disposal Site southeast of Caprock, New Mexico and Monument Disposal Site west of Monument, New Mexico.

The recommendations for additional work contained in the above referenced documents are approved with the following conditions:

1. The final soil sampling will include analysis for total concentrations of benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons using appropriate EPA approved sampling methods.
2. Amerada Hess will submit the proposed disposal sites of any wastes to be removed for proper disposal to OCD for approval prior to removal from the site.
3. Amerada Hess will notify OCD at least 72 hours in advance of all major project activities such that OCD may have the opportunity to witness the events and/or split samples.

Mr. Sam Small
October 26, 1993
Page 2

4. Amerada Hess will submit a report to OCD by January 21, 1994 which describes the work performed and contains the results of all sampling activities.

Please be advised that OCD approval does not relieve Amerada Hess of liability should contamination be discovered which is beyond the scope of the work plan. In addition, OCD approval does not relieve Amerada Hess of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Hobbs District Office
Ed Horst, NMED Hazardous and Radioactive Materials Bureau
Kenneth L. Davis, Carter & Burgess, Inc.

Is your RETURN ADDRESS completed on the reverse side?	SENDER: <ul style="list-style-type: none">• Complete items 1 and/or 2 for additional services.• Complete items 3, and 4a & b.• Print your name and address on the reverse of this form so that we can return this card to you.• Attach this form to the front of the mailpiece, or on the back if space does not permit.• Write "Return Receipt Requested" on the mailpiece below the article number.• The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Article Addressed to: Mr. Sam Small Amerada Hess Corporation P.O. Box 840 Samhole, TX 79360		4a. Article Number P-667-242-402	
	5. Signature (Addressee) [Signature]		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
	6. Signature (Agent)		7. Date of Delivery	
		8. Addressee's Address (Only if requested and fee is paid)		

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

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Consultants in Engineering, Architecture,
Planning and the Environment

OIL CONSERVATION DIVISION
RECEIVED

1993 OCT 12 AM 9 16

October 5, 1993

Mr. Sam Small
Amerada Hess Corporation
P.O. Box 840
Seminole, Texas 79360

RE: Phase II Proposal for Caprock and Monument Landfills

Dear Mr. Small:

Based on our discussions with the Oil Conservation Division and the Environment Department, we have been able to develop a course of action for the disposition of the various wastes in these two facilities. The following discussion outlines the requirements of these two agencies for each of the two sites.

SCOPE OF WORK - CAPROCK AND MONUMENT SITES

1. Collect four (4) soil samples from the four sides of the landfill dike. These samples must each be analyzed using the Toxicity Characteristic Leaching Procedure, Metals Scan (TCLP, Metals) to determine if they are hazardous wastes. If they are hazardous waste, the extents of the contaminated soil must be determined, and a remediation and/or disposal methodology must be developed for these soils.
2. All surface wastes from the landfill area must be removed and segregated according to waste type and potential hazardous waste characteristics. These types should include, but not be limited to drums, metal, plastic pails and buckets, timber, waste paint cans, etc. These wastes should be inspected to determine any indication of potential hazardous waste characteristics by noticing odor, discoloration, residues, labels, staining, etc. A maximum of eight (8) waste streams of this type are assumed for this task. Since the volume and type of each waste stream is indeterminate, final costs for the disposal of these items will be determined after segregation and testing. This item does include the transport of all uncontaminated metals to a local metals recycling facility.
3. Empty and clean drums should be crushed and placed with other clean metals for transport to a metals recycling facility. A maximum of 35 drums of this type is assumed.

4. Drums and containers with any residual materials present should be emptied and triple-rinsed. Rinsate must be contained and sampled to determine waste classification, then disposed of accordingly. Rinsate analysis should be conducted for full-scan TCLP and Reactivity, Corrosivity and Ignitability (RCI). Once triple-rinsed, these drums can be disposed of as clean and empty drums. A maximum of one (1) such sample of rinsate water is assumed in this proposal. It is assumed that fifteen (15) such containers will exist. This task does include the disposal of this rinsate.
5. Other wastes, such as those outlined in Task #2, that have potential hazardous waste characteristics should be appropriately sampled and analyzed to determine waste classification for disposal. A maximum of two (2) full-scan TCLP and RCI procedures is assumed for these wastes. Disposal options for this waste will range from a municipal solid waste disposal facility to a hazardous waste facility, based upon the profile developed. This item assumes that no more than five (5) tons of such waste is generated at each site, and includes costs for disposal of that amount.
6. Drums containing significant materials should be segregated according to type of waste. Determination should be made as to whether any of the discarded chemical at the Monument site can be used by Amerada Hess, since oilfield chemicals fall under the RCRA exploration and production exemption from hazardous waste status once they have been used, within certain guidelines, in exploration and production operations. The chemicals that cannot be used must be overpacked if leakage is possible, sampled and analyzed for TCLP and RCI to determine disposal options. All wastes, regardless of whether or not they are hazardous, will require sampling, profile analyses and acceptance notification by disposal facilities before acceptance by any facility can be assured and before final disposal costs can be ascertained. A maximum of ten (10) such drums, and corresponding TCLP and RCI analyses are assumed for this item. This item specifically assumes that none of the drummed materials have over 2% solids, and that the disposal of on more than the ten (10) drums is required.
7. After all wastes have been removed from the site, soil sampling and analyses for full-scan TCLP will be required at a depth of five (5) feet below the surface in five (5) locations at the Caprock site and nine (9) locations at the Monument site. If these analyses indicate unacceptable levels of contamination, further soil remediation or waste removal may be required.
8. Based on the results of the above work, Carter & Burgess will review the regulatory requirements to determine the appropriate course of action to achieve completion of the site remediation and cleanup. The possible courses of action are:

- A. Do Nothing condition - This item will outline the likely results if no final cleanup and site remediation is undertaken. It is unlikely that this option will be acceptable to the New Mexico Environment Department or the Oil Conservation Division.
- B. Cap & Close - This item will discuss the methodology and estimated costs to remove the surface wastes as segregated and cap and cover the landfills in place. This option will be available only if the soil analyses indicate that no migration of contaminants has occurred.
- C. Total Removal - This option, although relatively simple from a regulatory perspective, would probably be the most expensive and would involve total removal of all surface and buried wastes.
- D. Solid Waste Management Unit (SWMU) - This course of action applies in general to inactive solid waste sites on active facilities and requires the delineation and characterization of the waste unit and selection of a proper closure process under Resource Conservation and Recovery Act (RCRA) regulations as applied by the New Mexico Environment Department.
- E. Remedial Investigation/Feasibility Study (RI/FS) - This course of action, which is by far the most complex from a regulatory perspective, normally applies to inactive solid waste sites at inactive facilities. We believe that it would be in Amerada Hess Corporation's best interest to avoid this regulatory avenue, if possible.

Please note that the course of action to be determined in this Task can vary greatly depending upon the results of the assessment outlined in Tasks #1-7, and the resulting requirements of the New Mexico Environment Department and the Oil Conservation Division. This task involves only the determination of the proper course of action from this point. Preparation of items to initiate the final closure are beyond the scope of this proposal.

By copy of this letter, we are requesting that the New Mexico Oil Conservation Division and the New Mexico Environment Department Hazardous Waste Division note and document their concurrence with this proposed Scope of Work.

Costs for the execution of this work are rather difficult to quantify. Because of that, we would proposed performing this work at an hourly rate times a multiplier with a maximum not-to-exceed fee based on the assumed numbers of tests and/or procedures outlined above. Based on these assumptions, the proposed maximum not-to-exceed fee for each Task is as follows:

TASK NUMBER	TASK FEES		
	ITEM	CAPROCK	MONUMENT
1	Labor = Contractor = Analytical =	\$300.00 \$0 \$800.00	\$0 \$0 \$0
2	Labor = Contractor = Analytical =	\$10,000.00 \$12,500.00 \$0	\$10,000.00 \$12,500.00 \$0
3	Labor = Contractor = Analytical =	\$0 \$1,500.00 \$0	\$0 \$1,500.00 \$0
4	Labor = Contractor = Analytical =	\$0 \$800.00 \$1,000.00	\$0 \$800.00 \$1,000.00
5	Labor = Contractor = Analytical =	\$600.00 \$4,000.00 \$2,000.00	\$600.00 \$4,000.00 2,000.00
6	Labor = Contractor = Analytical =	\$0 \$0 \$0	\$600.00 \$7,200.00 \$10,000.00
7	Labor = Contractor = Analytical =	\$1,400.00 \$0 \$5,000.00	\$1,400.00 \$0 \$9,000.00
8	Labor =	\$2,500.00	\$2,500.00
TOTAL MAXIMUM NOT- TO-EXCEED FEE	Labor = Contractor = Analytical = Total =	\$14,800.00 \$18,800.00 \$8,800.00 \$42,400.00	\$15,100.00 \$26,000.00 \$22,000.00 \$63,100.00

Carter & Burgess is aware that projects of this type can be costly. Please be assured that we will do everything within our power to meet the regulatory requirements involved while providing you with the most cost-effective services possible.

It has been our pleasure serving you in the past, and we look forward to working with you again on this project. If you have any questions, or need any further information, please do not hesitate to contact either J. D. McNamara or myself.

Sincerely,

CARTER & BURGESS, INC.

A handwritten signature in black ink, appearing to read "Kenneth L. Davis". The signature is fluid and cursive, with the first name "Kenneth" being more legible than the last name "Davis".

Kenneth L. Davis, P.E.
Branch Manager

xc: ✓ Mr. William C. Olson
Hydrogeologist
Environmental Bureau
New Mexico Oil Conservation Commission

Mr. Edward Horst
Manager
Hazardous Waste Bureau
New Mexico Environment Department



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

August 25, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-378

Mr. Sam Small
District Superintendent
Amerada Hess Corporation
P.O. Drawer D
Monument, New Mexico 88265

**RE: CAPROCK DISPOSAL SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing Amerada Hess Corporation's "ENVIRONMENTAL ASSESSMENT OF CAPROCK DISPOSAL SITE" which was submitted to OCD by their consultant, Carter & Burgess, Inc. This report presents the results of an investigation of potential contaminants at an Amerada Hess disposal site southeast of Caprock, New Mexico

The OCD has the following comments and requests for information regarding the above referenced report:

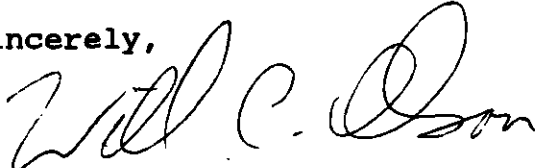
1. The wastes in the pit are not exempt from classification as hazardous wastes under federal RCRA Subtitle C regulations. Therefore, it must be demonstrated that the wastes are nonhazardous in order for OCD to continue to have oversight. The laboratory analytical tests for soils from the sides of the pit were not analyzed for all Subtitle C hazardous characteristics. Please provide OCD with analytical results from these soils for any hazardous waste characteristics which were not initially reported.
2. Some of the total metals concentrations in the soils are in excess of the toxic characteristic limit for hazardous waste. Please provide OCD with a Toxic Characteristic Leaching Procedure (TCLP) result for metals in the soils which exceeded RCRA Subtitle C toxic characteristic limits.

Mr. Sam Small.
August 25, 1993
Page 2

3. A drum containing fluid was sampled for pH and specific conductivity but was not analyzed for hazardous characteristics. Please provide OCD with an analysis of the fluid for all hazardous waste characteristics.
4. The report recommends removal of the solid wastes for proper disposal but does not indicate where these wastes will be taken. Please provide OCD with the proposed disposal site for the wastes.
5. After the wastes have been removed for disposal, the OCD requires that soil samples from beneath the solid waste piles be taken and analyzed for final remediation levels. Please provide a plan for performing these analyses.

Receipt of the above information will allow OCD to complete a review of this site assessment and remediation plan. If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Hobbs District Office
Ed Horst, NME
Ken Davis, Ca

SENDER: <ul style="list-style-type: none">• Complete items 1 and/or 2 for additional services.• Complete items 3, and 4a & b.• Print your name and address on the reverse of this form so that we can return this card to you.• Attach this form to the front of the mailpiece, or on the back if space does not permit.• Write "Return Receipt Requested" on the mailpiece below the article number.• The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Sam Small District Superintendent Amerade Hess Corporation P.O. Drawer D Monument, NM 88265		4a. Article Number P-667-242-378	
4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise		7. Date of Delivery 8-30-93	
5. Signature (Addressee) D. Hernandez		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

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MAR 24 1993

LETTER OF TRANSMITTAL

Attention: Ms. Kathy Brown	Date: 3/26/93	Project No: 92133401F 92139701F
To: State of New Mexico Oil Conservation Division	Re: Amerada Hess Caprock & Monument Disposal Sites	
P.O. Box 2088		
Sante Fe, New Mexico 87504-2088		

RECEIVEDWe are sending you these items via: U.S. Mail

MAR 29 1993

OIL CONSERVATION DIV.
SANTA FE

COPIES	DATE	DESCRIPTION
1	3/15/93	Report on Environmental Assessment of Caprock Disposal Site
1	3/15/93	Report on Environmental Assessment of Monument Disposal Site

<input type="checkbox"/> For approval	<input checked="" type="checkbox"/> For your use	<input type="checkbox"/> For review & comment
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REMARKS: As requested by Mr. Sam Small, Amerada Hess Corporation. (JES) 393-7144**SENDER:** Candace Reed Watkins

✓	FILE	PERSON	✓	FILE	PERSON	✓	FILE	PERSON
✓	Correspondence	N/A	✓	Environmental	CRW		Plumbing	
	Architectural			Event Facilities			Project Management	
	Civil			Mechanical			Structural	
	Electrical			Planning/LA.			Survey	
			✓	Ken Davis			Transportation	

PM-6

735-6000

11/92