

CORRESPONDENCE

MISC.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 8, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-586

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

**RE: CLOSURE REPORT
MONUMENT SITE #3**


Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) August 20, 1998 "CLOSURE REPORT, MONUMENT SITE 3, 3A, 3B, 3C, UNIT K, SECTION 36, TOWNSHIP 19 SOUTH, RANGE 36 EAST, LEA COUNTY, NEW MEXICO, JOB NO. 610057-2-3" and February 24, 1998 "CLOSURE REPORT, TEXAS-NEW MEXICO PIPE LINE COMPANY, MONUMENT SITE 3, 3A, 3B, 3C, LEA COUNTY, NEW MEXICO" which were submitted on behalf of TNMPLC by their consultant KEI. These documents request closure of remedial actions resulting from a crude oil pipeline spill at TNMPLC's Monument No. 3 site.

The above referenced closure request is approved. Please be advised that OCD approval does not relieve TNMPLC of liability if remaining contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and regulations.

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

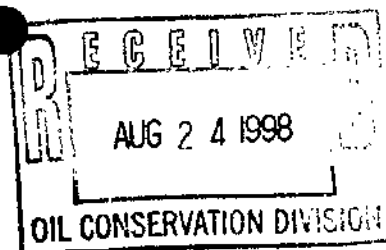
Sincerely,


William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Aztec Office
Mike Matush, State Land Office
Theresa Nix, KEI



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3763 FAX



August 20, 1998

Mr. William Olson
OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Closure Report
Monument Site 3, 3A, 3B, 3C
Unit K, Section 36, Township 19 South, Range 36 East
Lea County, New Mexico
Job No. 610057-2-3

Dear Mr. Olson:

This letter is in response to your letter dated July 17, 1998, regarding Site 3, 3A, 3B, and 3C closure request. Your letter states that closure is denied for these sites due to continuing on-site landfarming activities. The soils from these sites were landfarmed off-site at C&C Landfarm Inc., located approximately 2 miles south of Monument, New Mexico. A copy of the Certificate of Waste Status and OCD Form C-13 for the soils are attached.

Please contact me at (210) 680-3767 if you have any questions or need additional information.

Respectfully,

Theresa Nix

Theresa Nix
Project Manager

Attachment

cc: Wayne Price, OCD Hobbs Office
Tony Savoie, TNMPL
Marc Oler, TTTI

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: TNM Sites 3, 3A, 3B, 3C & 4 Monument area, La County

Source: Crude Oil Pipeline SPILL

Disposal Location: C & C Land Farm Inc. 2 miles South of Monument NM

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's July 1988 Regulatory Determination. To my knowledge, this waste will either be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous or has been verified non-hazardous due to "Knowledge of Process." I further certify that to my knowledge no "hazardous or listed wastes" pursuant to the provisions of 40 CFR Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3 (b).

I, the undersigned as the agent for the Texas New Mexico Pipeline Co.
concur with the status of the waste from the subject site.

NAME John A. Savoie

TITLE/AGENCY Senior Tech

ADDRESS P.O. Box 1030

SIGNATURE John A. Savoie

DATE 4-23-97

OLD HUBBS
OFFICE
APR 23 1997
RECEIVED

District I - (505) 393-6161
P.O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-13.
Originated 8/8/9

Submit Original
Plus 1 Copy
to appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/> <i>PFA 2 PRICT. NR 4 4/23/97</i>	4. Generator <i>Texas N.M. Pipeline Company</i>
Verbal Approval Received: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <i>Cooper Sites 3, 3A, 3B, 3C & 4</i>
2. Management Facility Destination <i>C & C Land Farm Inc.</i>	6. Transporter <i>Turner Trucking</i>
3. Address of Facility Operator <i>2 miles South of Monument NE 1/4 SW 1/4 Sect. 36 T19S R36E</i>	8. State <i>New Mexico</i>
7. Location of Material (Street Address or ULSTR)	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Crude oil Affected Soil

Non HAZardous By Knowledge of Process N.M.D.C.D.
Approved November, 1996

UDD HOBBS
APR 23 1997
RECEIVED

Estimated Volume 3000 cy Known Volume (to be entered by the operator at the end of the haul) _____ cy
SIGNATURE: *Jimmy T. Cooper* TITLE: Pres. DATE: 4-15-97
Waste Management Facility Authorized Agent
TYPE OR PRINT NAME: Jimmy T. Cooper TELEPHONE NO. _____

(This space for State Use)
APPROVED BY: *[Signature]* TITLE: FULLER FARM DATE: 4/23/97
APPROVED BY: _____ TITLE: _____ DATE: _____



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

July 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO: Z-235-437-316

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

RE: SPILL CLOSURE REPORTS

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed the following Texas-New Mexico Pipe Line Company (TNMPLC) documents which were submitted to the OCD on April 15, 1998.

- February 24, 1998 "CLOSURE REPORT, TEXAS - NEW MEXICO PIPE LINE COMPANY, MONUMENT SITES 3, 3A, 3B, AND 3C, LEA COUNTY, NEW MEXICO".
- February 24, 1998 "CLOSURE REPORT, TEXAS - NEW MEXICO PIPE LINE COMPANY, MONUMENT SITES 5A, LEA COUNTY, NEW MEXICO".
- February 24, 1998 "CLOSURE REPORT, TEXAS - NEW MEXICO PIPE LINE COMPANY, MONUMENT SITES 8 AND 8A, LEA COUNTY, NEW MEXICO".
- February 24, 1998 "CLOSURE REPORT, TEXAS - NEW MEXICO PIPE LINE COMPANY, -TNM-97-S1, LEA COUNTY, NEW MEXICO".
- February 24, 1998 "CLOSURE REPORT, TEXAS - NEW MEXICO PIPE LINE COMPANY, TNM-97-10, LEA COUNTY, NEW MEXICO".

These documents contain the results of TNMPLC's remediation of contaminated soils from crude oil pipeline spills at 5 different sites. Below is the OCD's review of these documents:

A. The OCD approves of the remedial actions taken at the sites listed below and considers these sites closed.

- | | |
|----------------------------|------------------------------|
| 1. Monument Site #5 | Unit H, Sec. 25, T19S, R36E. |
| 2. Monument Site #8 and 8A | Unit O, Sec. 19, T19S, R37E. |

Mr. Tony Savoie
July 17, 1998
Page 2

- | | | |
|----|-----------|------------------------------|
| 3. | TNM-97-S1 | Unit E, Sec. 29, T19S, R37E. |
| 4. | TNM-97-10 | Unit A, Sec. 05, T20S, R37E. |

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

- B. The soil remediation actions conducted at the site listed below are satisfactory. However, according to the report onsite landfarming actions are still continuing. Subsequently, the OCD cannot issue final closure approval at this time and approval of closure actions at this site is denied. Please resubmit a final closure report for this site upon completion of the landfarming activities. The final report will include the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

- | | | |
|----|---------------------------------|-----------------------------|
| 1. | Monument Sites 3, 3A, 3B and 3C | Unit K, Sec.36, T19S, R36E. |
|----|---------------------------------|-----------------------------|

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Aztec Office
Michael Hawthorne, KEI



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

January 30, 1998

CERTIFIED MAIL

RETURN RECEIPT NO: Z-235-437-222

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

**RE: ASSESSMENT REPORT
MONUMENT SITE #3**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed Texas-New Mexico Pipe Line Company's (TNMPLC) September 9, 1997 "COMPREHENSIVE ASSESSMENT REPORT, TEXAS - NEW MEXICO PIPELINE COMPANY MONUMENT SITE NO. 3, LEA COUNTY, NEW MEXICO" which was received by the OCD on October 3, 1998.

This document contains the results of TNMPLC's investigation of the extent of soil contamination resulting from a crude oil pipeline spill at TNMPLC's Monument No. 3 Site located in Unit K, Section 36, Township 19 South, Range 36 East, Lea County, New Mexico. The document also contains recommendations for remediation of remaining soil areas with elevated levels of petroleum contaminants.

The OCD approves of the recommendations contained in the above referenced document with the following conditions:

1. TNMPLC will submit a final remediation report upon completion of the soil remedial actions. The report will be submitted to the OCD Santa Fe Office for approval with a copy provided to the OCD Hobbs District Office.
2. TNMPLC will notify the OCD at least 48 hours in advance of scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Mr. Tony Savoie
January 30, 1998
Page 2

Please be advised that OCD approval does not relieve TNMPLC of liability if the investigation fails to adequately define the extent of contamination or, if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and regulations

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Aztec Office
Mike Matush, State Land Office
Michael Hawthorne, KEI