

SPILL REPORT



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

August 21, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-3518

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: LEA STATION

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) June 16, 2000 "E.O.T.T. ENERGY PIPELINE CONTAINMENT PLAN FOR THE LEA STATION" which was submitted on behalf of EOTT by their consultant Environmental Plus, Inc. This document contains EOTT's plan for installation of a containment berm around the pump area of the Lea Crude Station in order to contain future spills at the site.

The above referenced work plan is approved.

Please be advised that OCD approval does not relieve EOTT of liability should the berms fail to contain releases from the facility, or for investigation and remediation of releases within the containment area. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Pat McCasland, Environmental Plus, Inc.

Olson, William

From: ENVIPLUS1@aol.com [SMTP:ENVIPLUS1@aol.com]
Sent: Friday, June 16, 2000 10:52 AM
To: Olson, William
Cc: glenn.waldrop@eott.com; Williams, Donna; ashook@entrinx.com
Subject: Lea Station Containment Plan Submittal

Mr. Olson,

Attached is the E.O.T.T. Energy Pipeline, Containment Plan for the Lea Station. I am submitting this plan on behalf of Mr. Glenn Waldrop, E.O.T.T. Energy Pipeline, in concurrence with the conditions of your letter dated May 17, 2000. Your receipt of the plan should be acknowledged to Mr. Glenn Waldrop, E.O.T.T. Energy Pipeline, P.O. Box 1660, Midland, Texas 79702.

Pat McCasland
Environmental Plus, Inc.
P.O. Box 1558
Eunice, New Mexico 88231



LeaSIContPlan61600.d

oc

505-394-3481

E.O.T.T. ENERGY PIPELINE

“Containment Plan”

for the

“Lea Station”

Sec28, T20S, R37E,
~ 5.5 miles south of Monument
Lea County, New Mexico

June 16, 2000

Prepared by

Environmental Plus, Inc.
1324 North Main Street
P.O. Box 1558
Eunice, New Mexico 88231
Tele 505•394•3481 FAX 505•394•2601



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1 Lea Station Containment Plan

This Containment Plan was developed in response to the New Mexico Oil Conservation Division (NMOCD) request via letter dated May 17, 2000. The development and submittal of this plan to the NMOCD was one of the conditions of approval by the NMOCD of the report, E.O.T.T. ENERGY PIPELINE, PROJECT PLAN FOR THE CHARACTERIZATION & REMEDIATION OF LEA STATION, dated March 27, 2000 prepared by EPI.

E.O.T.T. Energy Pipeline operates a pipeline gathering and transmission system in Southeast New Mexico and West Texas, see Figure 1. Centralized storage and pumping facilities are located strategically at points within the system. This plan proposes a containment system for the "Lea Station" to ensure that crude oil spills are contained within the facility boundary and that environmental impacts are minimized.

1.1 Containment Plan Objectives

The plan objectives are to:

1. Contain crude oil released during an event, i.e., equipment failure or human error, within the site boundary.
2. Minimize environmental impact.

1.2 Environmental Status

Major releases of crude oil, i.e. >25 barrels (bbls), have occurred here in the past. Petroleum hydrocarbon residuals from these releases are still present and local ground water has been impacted. Previous owners of the facility currently monitor ground water and the NMOCD has been kept abreast of crude oil releases and attendant response, remediation, and monitoring activities at the site.

1.3 Site Description

As shown in Figure 1, "Lea Station" is located 600 feet due west of New Mexico State Road 8 approximately 5.5 miles south of Monument, New Mexico in Section 28, Township 20S, and Range 37E and. Pipelines extend to the west, north, and east of the pump area. The pumps are elevated above the natural topography with the site surface tilted to the southeast.

1.4 Facility Operations

The pump station is inspected at least once every 24 hours with discharge pressures monitored remotely. The electric pump motors are not explosion proof and, therefore, must be protected from flammable liquids.

1.5 Current Containment System

Currently, all site run-off, i.e., released fluid and rain water, follows a southeasterly flow path to a low area outside the eastern facility fence. A soil berm has been constructed to the south of the pump area to prevent any released fluid from flowing to the south and west. All site run-off is diverted off-site into the low area east of the facility boundary. Refer to Figure 1.

1.6 Proposed Containment System

To prevent released crude oil from flowing off-site, it is proposed that an earthen berm be constructed along the east and south boundary and be of sufficient height to contain a volume of crude oil that could be released in a 12 hour period. To eliminate inundation of the non-explosion proof electric pump motors, the berm height will be restricted to an elevation below the level of the pumps. The maximum credible volume of crude oil that can be released during a catastrophic event is 25,000 bbls, i.e., the total volume of the station storage tank. The proposed north/south berm will be constructed inside the east facility fence line and will extend north 180' from the southeast fence corner. The east/west berm will extend west 215' from the southeast fence corner. The berms will be constructed of local soil, which will be excavated from within the bermed area. The basin formed during the excavation and by the berms will be at least 4' deep and below the elevation of the pumps.

Basin volume: $180' \times 215' \times 4' = 154,800 \text{ ft}^3$

Crude oil release volume: $25,000 \text{ bbls} = 140,364 \text{ ft}^3$

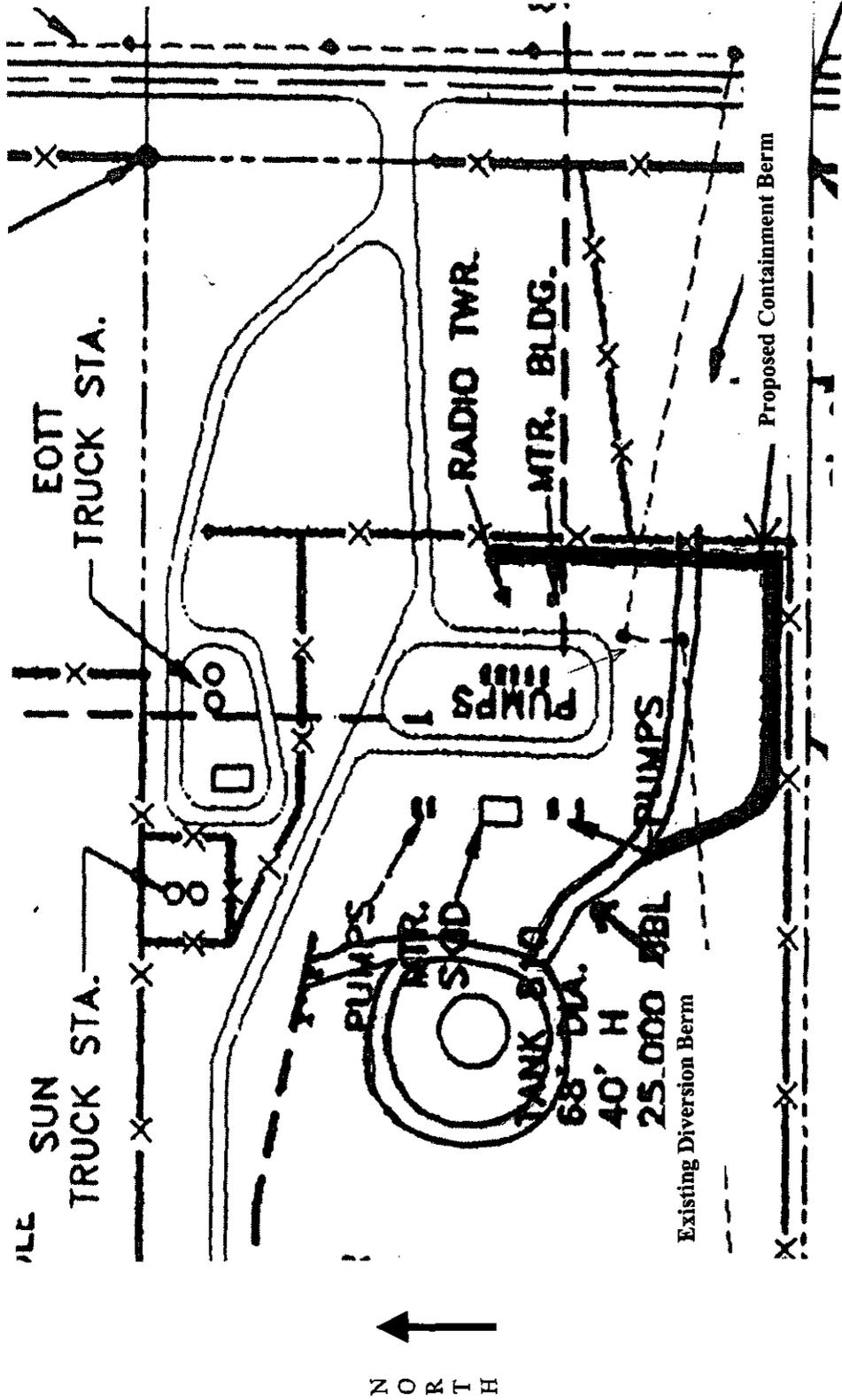
1.7 Environmental Considerations

The basin formed by the excavation and berms will receive all run-off from the site including storm water. Storm water run-off that accumulates in the basin and commingles with crude oil will be disposed of in an NMOCD approved facility. Storm water may be allowed to evaporate but volumes must be managed to maintain a minimum of 140,364 ft³ reserve capacity of the basin for a potential crude oil release.

1.8 Safety

During construction of the berm and installation of the liner, contractors will comply with all Occupational Safety and Health Administration (OSHA) regulations, as well as, E.O.T.T. Energy Pipeline's contractor safety program requirements.

Figure 1- Lea Station Site Map



E.O.T.T. ENERGY PIPELINE

"LEA STATION"

Sec28, T20S, R37E,
 ~5.5 miles south of Monument
 Lea County, New Mexico



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 17, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-3105

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: LEA STATION

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) March 27, 2000 "E.O.T.T. ENERGY PIPELINE PROJECT PLAN (PJP) FOR THE CHARACTERIZATION & REMEDIATION OF LEA STATION" which was submitted on behalf of EOTT by their consultant Environmental Plus, Inc. This document contains EOTT's work plan for investigation of the extent of soil contamination related to a crude oil spill at EOTT's Lea Station located in Section 28, Township 20 South, Range 37 East. The document also contains a recommended work plan for remediation of contaminated soils.

The above referenced work plan is **approved with the following conditions:**

1. EOTT shall determine the extent of contamination prior to application of bioremediation products.
2. In order to determine the initial concentrations in the soil stockpile, a five point composite shall be obtained for every 1000 yards of stockpiled soils.
3. All initial soil samples from the unexcavated areas used to determine the extent of contamination and the final soil confirmation samples of the remediated soils will be taken as discreet soil samples and not as composite samples.
4. All soil samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
5. All water used to facilitate bioremediation shall be applied such that the water does not cause runoff or drive contaminants into underlying ground water.

6. EOTT shall submit a plan to install a containment system around the station pump area in order to contain future spills at the site. The plan shall be submitted to the OCD Santa Fe Office by June 16, 2000 with a copy provided to the OCD Hobbs District Office.
7. All wastes generated during the investigation and remediation activities shall be disposed of at an OCD approved facility.
8. EOTT shall submit the results of the investigation, monitoring and remedial actions to the OCD in an annual report. The report shall be submitted to the OCD Santa Fe Office by April 1, 2001 with a copy provided to the OCD Hobbs District Office and shall include the following information:
 - a. A description of all investigation, monitoring and remediation activities which occurred during the last calendar year including conclusions and recommendations.
 - b. Summary tables of all soil sampling results obtained during the investigation and remediation activities and copies of all laboratory analytical data sheets and associated QA/QC data.
 - c. A map showing all excavated and remediated areas in relation to other significant site features.
 - d. The volumes and types of all bioremediation products and water used to facilitate bioremediation of contaminated soils.
 - e. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve EOTT of liability should the work plan fail to adequately remediate or monitor contamination related to EOTT's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

Olson, William

From: ENVIPLUS1@aol.com [SMTP:ENVIPLUS1@aol.com]
Sent: Tuesday, May 09, 2000 3:26 PM
To: Olson, William
Subject: EOTT Lea Station PJP

Bill,

To make sure you get the document, I am sending it through the NMOCD/EB website address listed for you. Please let me know if you agree with the proposed plan.

Pat McCasland



LeaStatPjPFinalRev.do

c

Environmental Plus, Inc.

Olson, William

From: ENVIPLUS1@aol.com [SMTP:ENVIPLUS1@aol.com]
Sent: Monday, May 08, 2000 10:12 AM
To: Olson, William
Subject: EOTT Energy Pipeline Lea Station Project Plan

Bill,

Attached is the EOTT Lea Station Project Plan for your consideration and enjoyment. Please contact me 1) if there are any questions and 2) if you approve of implementation of the PjP.

Sincerely,

Pat McCasland



LeaStatPjPFinalRev.do

c

Environmental Plus, Inc.

E.O.T.T. ENERGY PIPELINE

PROJECT PLAN (PJP),

FOR THE

CHARACTERIZATION & REMEDIATION OF

“LEA STATION”

Sec28, T20S, R37E,
~ 5.5 miles south of Monument
Lea County, New Mexico

March 27, 2000

Prepared by

Environmental Plus, Inc.
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P.O. Box 1558
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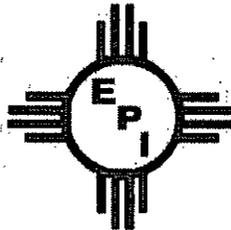


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1 LEA STATION SITE CHARACTERIZATION PROJECT PLAN (PJP)

This plan will provide information regarding historical crude oil releases, initial response activities, current status, and proposed remediation of the EOTT Lea Station site.

1.1 Objectives

- Collect information to establish vertical and horizontal extent of crude oil contamination
- Compile historical information for the site
- Document site lithology
- Quantify hydrocarbon source term
- Propose site remediation work plan

1.2 Site and Event Description and Initial Response

The spill site, ~280' x 125', is down gradient and due east of the E.O.T.T. Energy Pipeline Lea Station crude oil handling facility. The spill occurred when a pump failed and crude oil was released to the spill area. Upon discovery, EOTT verbally notified the New Mexico Oil Conservation Division (NMOCD) of the release and later submitted a form C-141 relating pertinent information, i.e., release and recovery volumes and initial response. Initial response activities included shutting the system down and recovering pooled crude oil. Following recovery, the impacted area was excavated to approximately the 5 feet below ground surface (bgs). This material was stockpiled north of the spill site. Approximately 5850 yd³ of crude oil-affected soil was shredded, aerated mechanically, to enhance volatilization and reduction in regulated compounds, i.e., Benzene, Toluene, Ethyl Benzene, and m,p,&o Xylenes (BTEX).

1.2.1 Historical Land Use

The spill area has received liquids from historical crude oil releases. Currently, ground water monitoring wells are located near the center of the spill site and up-gradient and down-gradient of the spill site. These monitoring wells were installed and are being monitored by another party other than EOTT.

1.2.2 Legal Description

The site is located approximately 5.5 miles south of Monument, Lea County, New Mexico in Sec28, T20S, R37E, and is adjacent to and west of New Mexico State Road #8.

1.2.3 Ecological Description

The area is typical of the Upper Chihuahuan Desert Biome consisting primarily of hummocky sand hills covered with Harvard Shin Oak (*Quercus harvardi*) interspersed with Honey Mesquite (*Prosopis glandulosa*) along with typical desert grasses and weeds. Mammals present, include Orrd's and Merriam's Kangaroo Rat, Deer Mouse, White Throated Wood Rat, Cottontail Rabbit, Black Tailed Jackrabbit, and the Mule Deer. Reptiles, Amphibians, and Birds are numerous and typical of area.

1.2.4 Environmental Media Characterization

Chemical parameters of the soil and ground water will be characterized consistent with the NMOCD guidelines published in the following documents;

- Guidelines for Remediation of Leaks, Spills and Releases (August 13, 1993)
- Unlined Surface Impoundment Closure Guidelines (February 1993)

Acceptable "Site Specific" thresholds for constituents of concern (COCs), i.e., TPH and BTEX, will be determined based on the following;

- Depth to ground water, i.e., distance from the lower most acceptable concentration to the ground water.
- Wellhead Protection Area, i.e., distance from spill site to fresh water supply wells.
- Distance to Surface Water Body, i.e., horizontal distance from spill site to down gradient surface water bodies.

1.2.4.1 Ground Water Level

Contemporary ground water level data will be obtained from the monitor well located near the center of the spill site.

1.2.4.2 Depth to Ground Water Calculation

The depth to ground water calculation, i.e., the vertical distance from the lowermost COC to the seasonal high water elevation of the ground water, will be performed after soil COC data is collected.

1.2.4.3 Ground Water Gradient

According to the USGS (Nicholson & Clbesch), the regional ground water gradient is to the southeast.

1.2.4.4 Wellhead Protection Area

Water wells within a 1-mile radius of the site will be documented.

1.2.4.5 Distance to Nearest Surface Water Body

There are no naturally occurring surface water bodies located within a 1-mile radius of the site.

1.2.4.6 Soil Assessment

Stockpiled soil, as well as, unexcavated soil will be sampled and analyzed to quantify hydrocarbon source term and vertical extent of COC according to the following regime.

- A. Analytical Suite: TPH by EPA Method 8015M), and BTEX by EPA Method 8260. In addition, samples will be analyzed for pH, Total Organic Carbon (TOC), and Anions and Cations to evaluate potential effectiveness of bioremediation.
- B. Sample Locations:
 - 1) Stockpiled soil: Composite of 10 core samples
 - 2) East half of spill area: Samples will be composited from individual samples collected from center of area, and from four quadrants within area. From these locations, a composite sample will be collected from the following depths:
 - 1' to 5' Interval
 - 5' to 10' Interval
 - >10' as necessary
 - 3) West half of spill area: Samples will be composited from individual samples collected from center of area, and from four quadrants within area. From these locations, a composite sample will be collected from the following depths:
 - 1' to 5' Interval
 - 5' to 10' Interval
 - >10' as necessary

1.2.4.7 Site Mapping and Photographs

A detailed Site Map will be developed identifying infrastructure, sample locations, etc.

1.2.4.8 Ground Water Assessment

Information regarding the ground water for the area will be obtained from contemporary monitoring reports for the existing monitor wells.

1.3 Data Quality

To ensure quality and credibility of data used to support successful site remediation the following quality controls will be documented.

- Laboratory data must have > 85% recovery for TPH and BTEX and >75% recovery for general chemistry parameters.
- Laboratory data must have <15% Relative Percent Difference
- Field headspace analyses must be supported with instrument calibration data and calibration gas certification.

Duplicates or blanks may be submitted to the laboratory to establish reproducibility and possible laboratory contamination, respectively.

1.4 Project Safety

Hazards that will be encountered at this site include the following:

- Moving equipment
- Buried pipelines
- Highway ingress/egress
- Excavation
- Potential Hydrogen Sulfide Gas

Employees and subcontractors will be required to confirm current training in these hazards. Standard personal protective equipment will include;

- Personal H₂S Monitor
- Hard-hat
- Excavation Safety
- Steel Toed Boots/Shoes
- Safety Glasses

2 LEA STATION REMEDIATION PLAN

Given the crude oil spill history of the site, resulting in the presence of residual hydrocarbons in the soil and current TPH-affected ground water, the most feasible remediation alternative for this site is bio-remediation. E.O.T.T. proposes to accelerate natural attenuation by augmenting contaminated soil with nutrients, microbes, and emulsifying agents. These liquids will be applied according to the manufacturers recommended rates and blended with the soil. Performance of the modified in-situ bio-cell will be monitored monthly and reported to the NMOCD. Application rates for the bio-remediation enhancement products will be based on contaminated soil volume as identified during site characterization. The Material Safety Data Sheets and other pertinent information for the bio-remediation enhancement products, i.e., MicroBlaze Spill Control and MicroBlaze Bio-Catalyst are included as Attachment I.

2.1 Objective

The objective of the PjP is to enhance and accelerate the naturally occurring bioremediation of the crude oil-affected soil in the spill area. The process will be guided by data from the characterization. The process will include:

- Application of bio-enhancing nutrients and emulsifiers in the bio-cell.
- Application of petrophilic facultative bacteria
- Mechanical mixing of unexcavated soil and stockpiled soil to ensure homogeneity within the bio-cell matrix.
- Submittal of Initial Characterization Report
- Submittal of monthly activity documentation and monitoring report

2.2 PjP Process/Procedure

Upon approval by the NMOCD, the following sequence will be used to guide project implementation.

1. Issue "One Call" and notify utilities of proposed excavation activities
2. Locate, hand spot, and mark buried lines or other structures
3. Verify location of overhead powerlines if present
4. Lockout/Tagout facility equipment if necessary

2.2.1 Initial Construction Process and Micro-Blaze Application

Equipment required for site activities will include a backhoe, a D7 dozer, and an excavator. Use of these pieces of equipment will facilitate homogenization of soil and treating solutions.

2.2.1.1 Construction Activities

The following process will adequately treat soil in the impacted area to the 10' interval, approximately 12,350 yd³ and will be modified if warranted following evaluation of the preliminary characterization data. TPH-affected soils identified during site characterization that extend below 5 feet will be treated by injection or mechanical mixing at similar application rates.

1. Push unexcavated soil in the spill site area into windrows creating trenches at least 4 feet deep.
2. Apply approximately 6,500 gallons (155 bbls) of 6.0% Micro-Blaze Bio-Catalyst. Information regarding Micro-Blaze Bio-Catalyst is included in Attachment A.
3. Mix unexcavated soil with dozer to ensure dispersion of solution.
4. Level out the bottom of spill site area.
5. While replacing stockpiled soil back into excavated area, apply approximately 5,900 gallons (140 bbls) of 6.0% Micro-Blaze Spill Control and 6.0% Micro-Blaze Bio-Catalyst to the stockpiled soil.

6. Berm spill site area to prevent surface flow onto treated soil and contour surface of treated soil.

2.2.1.2 Monthly Monitoring and Maintenance

Monitoring of the treated soils will include the following:

1. Frequency of monitoring will be monthly.
2. Samples will be analyzed for the following analytical suite: pH, TOC, TPH (8015M) and BTEX (8260).
3. A sample will be composited from four quadrants of the east half of the spill site area. One sample will be composited for each of the following intervals:
 - 1' to 5' Interval
 - 5' to 10' Interval
 - >10' as necessary
4. A sample will be composited from four quadrants of the west half of the spill site area. One sample will be composited for each of the following intervals.
 - 1' to 5' Interval
 - 5' to 10' Interval
 - >10' as necessary

Weekly inspections will be performed of the site. Monthly maintenance of the bio-cell will include;

- Irrigation;
- Deep disking; and
- Berm maintenance.

2.2.1.3 Bio-Cell Performance

The "in-situ" bio-remediation will take place aerobically in the upper 5 feet and anaerobically/anoxically at intervals below 5 feet. Remediation rates should achieve an aerobic remediation rate of 50 % per year within the 1'-5' interval and an anaerobic remediation rate of 25 % per year for intervals >5'. These objectives are conservative and achievable; however, less than ideal conditions may affect performance. To facilitate bioremediation of the treated soil, only low-TDS irrigation water, i.e., < 500 ppm, will be applied to the bio-cell. In addition, run-in, either crude oil or storm water from the pump station to the west will not be allowed.

Following the first year of activity, the remediation rate for the 0 to 5 foot interval and for the intervals >5' will be calculated using TPH (8015M) data as follows:

$$[(12\text{th month ppm} + \text{Initial ppm}) - 1] \times 100 = \text{Remediation Rate in percent.}$$

2.3 Reporting

The information and data generated by this PjP will be summarized in a report a submitted to the NMOCD and will include the following outline information.

- Project plan implementation activities and events journal;
- Location map;
- Bore hole logs;
- Illustration of the subsurface with data summaries by interval; and
- Discussion of project conclusions.

Subsequent monthly reports will be submitted to the NMOCD to document progress and occurrences. Maintenance and occurrences at the site will be documented and reported in the monthly reports. It is suggested that the treatment method be evaluated for trend after one year, if COC concentrations are decreasing, monitoring should be decreased to quarterly. Monthly maintenance and weekly inspections will continue.

Attachment I: MicroBlaze Information



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCE

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

June 14, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-162

Ms. Lennah Frost
Environmental & Safety Coordinator
EOTT Energy Corp.
P.O. Box 1660
Midland, Texas 79702

RE: LEA CRUDE STATION

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corp.'s (EOTT) June 7, 1996 "LEA STATION, LEA CO., NM". This document contains EOTT's proposed modification to their March 26, 1996 work plan for remediation of contamination related to an March 15, 1996 spill of crude oil at the Lea Crude Pump Station.

The above referenced work plan modification is approved under the conditions on the enclosed attachment.

Please be advised that OCD approval does not relieve EOTT of liability should the remedial actions fail to adequately remediate or determine the extent of contamination related to the spill. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,
William C. Olson

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office

US Postal Service
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PS Form 3800, April 1995

OCD APPROVAL CONDITIONS
FOR
REMEDICATION OF LEAKS AND SPILLS
(June 14, 1996)

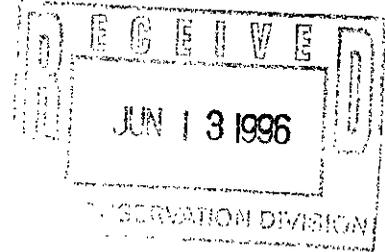
1. The following remedial actions will be performed in accordance with OCD's August 13, 1993 "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES":
 - a. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - b. Final vertical and horizontal soil contaminant concentrations as well as the final soil contaminant concentrations of the landfarmed areas will be determined either during or upon completion of remedial actions.
 - c. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons.
2. All wastes removed from a specific site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to remedial actions.
4. Upon completion of all remedial actions, a final remedial action report containing a description and the results of all remedial actions will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final remedial action report be submitted only upon completion of all remedial activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Santa Fe Office for approval with copies provided to the OCD Hobbs Office.
6. OCD approval does not relieve you of liability should remedial activities determine that contamination exists which is beyond the scope of the work plan or if the actions fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 687-2040

June 7, 1996

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: Bill Olson



RE: Lea Station, Lea Co., NM

Dear Bill:

As per my conversation with you on May 23, 1996, EOTT has sampled various sites in and around the contaminated area at Lea Station (map and analytical results attached). Based on analytical results of soil sampling taken over the past month, the history, and the condition of Lea Station, EOTT believes that remediation to the 100 ppm level may not be achievable below 24"-30".

As you are aware, Shell Pipeline has an ongoing remediation project at this station. Sample #2 on the attached map was taken at a depth of 30", on top of indurated caliche (the sample had to be chipped out), and came back with a TPH of 8200 ppm (418 method). Sample #4 was taken at the same location 27 days later and came back with a 4600 TPH (8015 method). Sample #1 was taken in an area that is outside of our contaminated area and came back with a TPH of 99,000 ppm (418 method). We believe that this contamination was the results of a spill that occurred when Shell owned the station and that some of the contamination that we are seeing in Samples #2 and #4 may be part of this same spill. Sample #3 was taken across the road from our spill and the TPH was 260 ppm (418 method). Sample #5 was taken at the property fence line 100 feet away from our spill area and TPH was non-detectable (8015 method)

EOTT proposes to continue with remediation plans as approved by you in a letter dated April 25, 1996, however, we now request permission to remediate only the surface (24-36") to a level of 100 ppm. Due to the fact that Shell has a groundwater contamination remediation project at the station, EOTT believes that our March 15, 1996 spill has not and will not impact their project or the ground water at the station.

Sincerely,

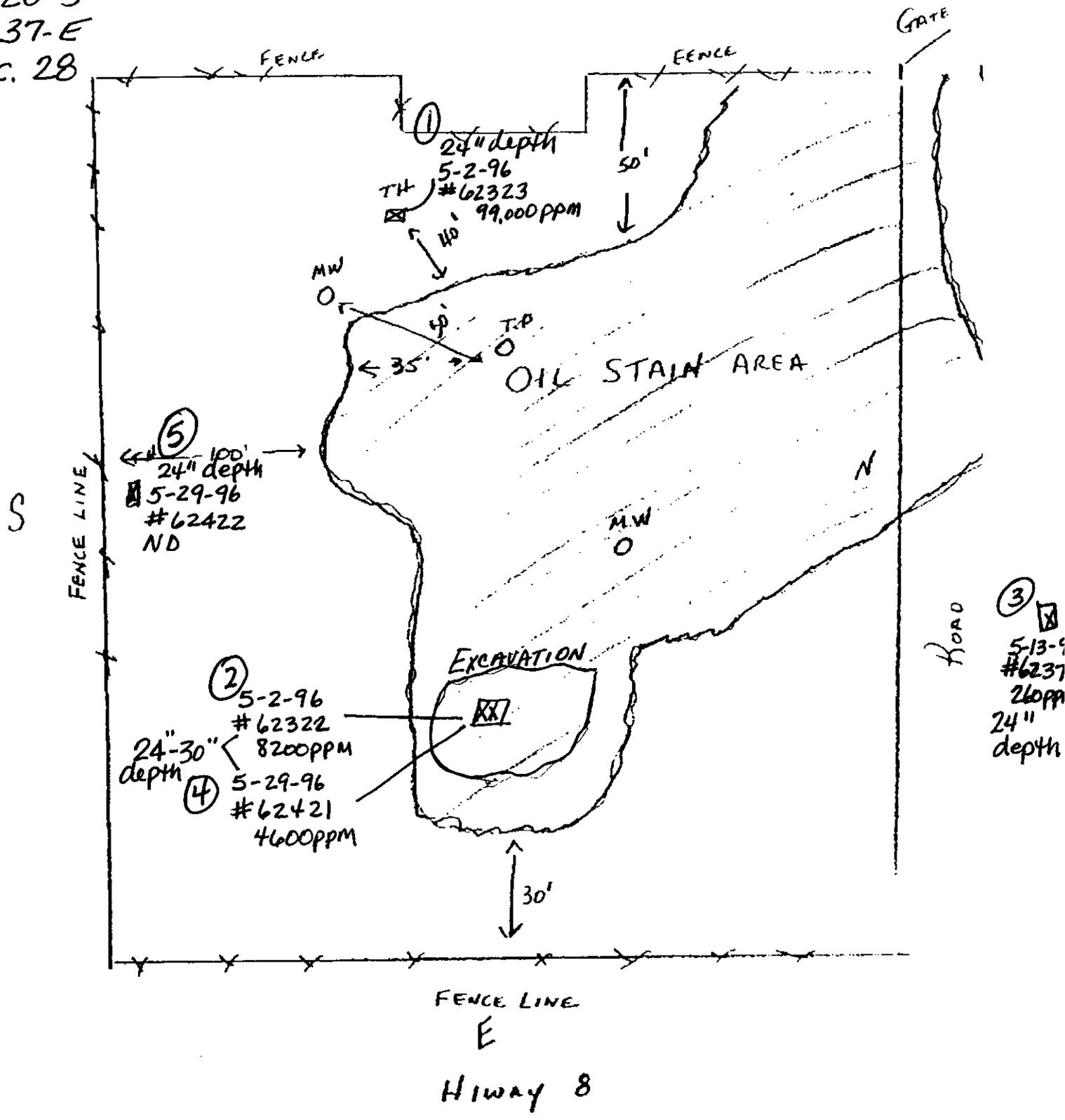
A handwritten signature in cursive script that reads "Lennah Frost".

Lennah Frost
Environmental Engineer

attachments

EDOT ENERGY PIPELINE
LEA STATION
LEA CO., NM
T-20-S
R-37-E
SEC. 28

W Pump Area



① 24" depth
5-2-96
TH #62323
99,000 ppm
40'

⑤ 100'
24" depth
5-29-96
#62422
ND

② 5-2-96
#62322
24"-30" depth
8200ppm
④ 5-29-96
#62421
4600ppm

③ 5-13-96
#6237
26000
24" depth

FENCE LINE
E
Hiway 8

Sample #1



60 East First Street
Mound Valley, KS 67354
Phone: 316/328-3222
FAX: 316/328-2033

Company: EOTT ENERGY CORPORATION
Contact: Lennah Frost
Client #: 4742
LAB ID: 62323
QC Sample ID: 62323
Matrix: Solid
Client ID: Background
Lea Station

Date Sampled: 05/02/96 13:10
Date Received: 05/06/96 09:00
Date Prepared: 05/06/96 16:07
Date Analyzed: 05/07/96 09:30
Date Reported: 05/07/96 15:27
Units: mg/kg
Page 1

**Total Recoverable Petroleum Hydrocarbons
EPA 418.1 Mod.**

Compound	Result	Detection Limit
TPH	99000	5000

QC Results	Spike %Recovery	Acceptable Limits	Spike Duplicate RPD	Spike Dupl RPD Acceptable Limits
Kerosene	84	67-128	2	0 - 27

*- Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

Chemist

Sample # 2



60 East First Street
Mound Valley, KS 67354
Phone: 316/328-3222
FAX: 316/328-2033

Company: EOTT ENERGY CORPORATION
Contact: Lennah Frost
Client #: 4742
LAB ID: 62322
QC Sample ID: 62323
Matrix: Solid
Client ID: Bottom Excavation
Lea Station

Date Sampled: 05/02/96 13:00
Date Received: 05/06/96 09:00
Date Prepared: 05/06/96 16:07
Date Analyzed: 05/07/96 09:17
Date Reported: 05/07/96 15:27
Units: mg/kg
Page 1

Total Recoverable Petroleum Hydrocarbons
EPA 418.1 Mod.

Compound	Result	Detection Limit
TPH	8200	500

QC Results	Spike %Recovery	Acceptable Limits	Spike Duplicate RPD	Spike Dupl RPD Acceptable Limits
Kerosene	84	67-128	2	0 - 27

* - Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

SDG - 60627

Chemist

Sample #3



60 East First Street
Mound Valley, KS 67354
Phone: 316/328-3222
FAX: 316/328-2033

Company: EOTT ENERGY CORPORATION
Contact: Lennah Frost
Client #: 4742
LAB ID: 62379
QC Sample ID: 62378
Matrix: Solid
Client ID: #2 Background - North
Lea Station

Date Sampled: 05/13/96 09:45
Date Received: 05/16/96 09:00
Date Prepared: 05/16/96 15:16
Date Analyzed: 05/17/96 10:52
Date Reported: 05/20/96 08:16
Units: mg/kg
Page 1

Total Recoverable Petroleum Hydrocarbons
EPA 418.1 Mod.

Compound	Result	Detection Limit
TPH	260	5.00

QC Results	Spike %Recovery	Acceptable Limits	Spike Duplicate RPD	Spike Dupl RPD Acceptable Limits
Kerosene	107	65-147	1	0 - 27

* - Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

SDG - 60648


Chemist

Sample #4



60 East First Street
Mound Valley, KS 67354
Phone: 316/328-3222
FAX: 316/328-2033

Company: EOTT ENERGY CORPORATION
Contact: Lennah Frost
Client #: 4742
LAB ID: 62421
QC Sample ID: 62421
Matrix: Solid
Client ID: #1 Bottom Excavation #2

Date Sampled: 05/29/96 11:30
Date Received: 05/30/96 09:30
Date Prepared: 05/30/96 13:21
Date Analyzed: 06/03/96 21:27
Date Reported: 06/04/96 11:12
Units: mg/kg
Page 1

**Total Extractable Petroleum Hydrocarbon
EPA 8015 Mod**

Compound	Result	Detection Limit
TEPH	4600	100

Surrogate Result	%Recovery	Acceptable Limits
o-Terphenyl	340*	28 - 121

*- Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

QC Results	Spike %Recovery	Acceptable Limits	Spike Duplicate RPD	Spike Dupl RPD Acceptable Limits
Diesel Fuel	179*	43-131	8	0 - 20

*- Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample


Chemist

Sample #5



60 East First Street
Mound Valley, KS 67354
Phone: 316/328-3222
FAX: 316/328-2033

Company: EOTT ENERGY CORPORATION
Contact: Lennah Frost
Client #: 4742
LAB ID: 62422
QC Sample ID: 62421
Matrix: Solid
Client ID: #2 Background #1

Date Sampled: 05/29/96 11:45
Date Received: 05/30/96 09:30
Date Prepared: 05/30/96 13:21
Date Analyzed: 06/03/96 20:46
Date Reported: 06/04/96 11:12
Units: mg/kg
Page 1

**Total Extractable Petroleum Hydrocarbon
EPA 8015 Mod**

Compound	Result	Detection Limit
TEPH	Not Detected	10.0

Surrogate Result	%Recovery	Acceptable Limits
o-Terphenyl	99	28 - 121

*- Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

QC Results	Spike %Recovery	Acceptable Limits	Spike Duplicate RPD	Spike Dupl RPD Acceptable Limits
Diesel Fuel	179*	43-131	8	0 - 20

*- Indicates the value is low/high due to matrix interference, confirmed by analysis of Laboratory Control Sample

Chemist



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES

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

April 25, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-138

Ms. Lennah Frost
Environmental & Safety Coordinator
EOTT Energy Corp.
P.O. Box 1660
Midland, Texas 79702

RE: LEA CRUDE STATION

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corp.'s (EOTT) March 26, 1996 "REMEDICATION OF CRUDE OIL CONTAMINATED SOIL, LEA STATION, LEA COUNTY, NM". This document contains EOTT's work plan for remediation of contamination related to an March 15, 1996 spill of crude oil at the Lea Crude Pump Station.

The above referenced work plan is approved under the conditions on the enclosed attachment.

Please be advised that OCD approval does not relieve EOTT of liability should the remedial actions fail to adequately remediate or determine the extent of contamination related to the spill. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office

P 269 269 138

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Postmark or Date	

PS Form 3800, April 1995

OCD APPROVAL CONDITIONS
FOR
REMEDICATION OF LEAKS AND SPILLS

1. The following remedial actions will be performed in accordance with OCD's August 13, 1993 "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES":
 - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
 - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - c. Final soil contaminant concentrations will be determined upon completion of remedial actions.
 - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons.
2. All wastes removed from a specific site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to remedial actions.
4. Upon completion of all remedial actions, a final remedial action report containing a description and the results of all remedial actions will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final remedial action report be submitted only upon completion of all remedial activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Santa Fe Office for approval with copies provided to the OCD Hobbs Office.
6. OCD approval does not relieve you of liability should remedial activities determine that contamination exists which is beyond the scope of the work plan or if the actions fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

CONSERVATION DIVISION
REC'D 450

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-8161

96 APR 19 AM 8 52

NMOCD INTER-OFFICE CORRESPONDENCE

TO: Roger Anderson-Environmental Bureau Chief
From: Wayne Price-Environmental Engineer *Wayne Price*
Date: April 17, 1996
Reference: EOTT Lea Station-
Subject: Non-Exempt Crude Oil Spill
Comments:

RECEIVED

APR 19 1996

Environment Bureau
Oil Conservation Division

Dear Roger,

Per our telephone call this morning please find attached a copy of EOTT's letter to me dated March 26, 1996 and the spill report. Since this site has existing ground water contamination and would probably be classified as a WQCC "permissible" facility, I am forwarding this on to your department to handle.

Please note Bill Olson is currently handling the existing ground water contamination case for this site from previous operations by Shell Pipeline. The depth to ground water is reported to be at approximately 26'-31' (feet).

Please note I have discussed this issue with EOTT's E&SC (Lennah Frost) and advised her that the "Guidelines For Remediation of Leaks, Spills and Releases" recommends and allows EOTT to take any "Initial Response Actions" deemed necessary to eliminate the source, secure the site, contain and stabilize any products or waste, in order to protect public welfare, ground water and/or the environment.

However, after the initial response is over then EOTT is required to classify and determine if the waste on site is hazardous per RCRA requirements. EOTT has established and received approval for their RCRA "Knowledge of Process".

When EOTT has pipeline spills they normally follow the procedure that was set out during the meeting held in Hobbs NM concerning Non-Exempt crude oil pipeline spills, however in this case this leak occurred at a "permissible" WQCC Crude Oil Pump Station, therefore the approval for the Remedial Action will have to be approved out of our Santa Fe Environmental Bureau office.

EOTT has been furnished the guidelines for these type of facilities.

EOTT has expressed concern about having to excavate all of this material and dispose of off-site due to the economics and the other historical material that remains under this spill. They also have requested they would like to start tilling and/or excavating immediately to prevent any further downward migration of contaminates.

Ms. Frost has verbally indicated the material has only gone down 18 inches as of this date.

Since they have their "Knowledge of Process" I advised them they can take any interim steps of their choice necessary to protect their workers or the environment, but the final remedial action will be approved thur our NMOCD Santa Fe, Environmental Bureau.

I also advised EOTT that NMOCD District I approval of interim actions requested by EOTT now (such as tilling, excavating, etc. now) will be their responsibility if such actions as deemed by the NMOCD Santa Fe Environmental Bureau indicate or decide that they have not properly addressed remaining contaminates which might pose a future threat to ground water, surface water, human health or the environment.

In addition, NMOCD approval does not relieve (EOTT) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

cc: Jerry Sexton-NMOCD District I Supervisor
Gary Wink-NMOCD District I Field Rep. II
Lennah Frost-EOTT E&SC
Bill Olson-NMOCD Hydrogeologist-Environmental Bureau

attachments-2

EOTT ENERGY Pipeline Limited Partnership

March 26, 1996

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 687-2040

State of New Mexico
Oil Conservation Division
Hobbs District Office
P.O. Box 1980
Hobbs, NM 88241-1980
Attn: Wayne Price

915-687-2713 KBT

RE: SNR

RE: Remediation of Crude Oil Contaminated Soil
Lea Station, Lea County, NM

Dear Wayne:

EOTT Energy Pipeline Limited Partnership requests permission to remediate, on site, approximately 1330 cubic yards of crude oil contaminated soil. The contamination is a result of a spill that happened when the packing blew out on a PD pump at the station on March 15, 1996. Approximately 200 barrels of crude oil were released. EOTT was able to pickup 170 barrels with the remaining 30 barrels soaking into the sandy soil. All contamination remained on EOTT owned land. EOTT has process knowledge of the material and has determined that the contaminated soil is non-hazardous.

EOTT plans to remediate to levels set by the NMOCD in their Guidelines for Remediation of Leaks, Spills and Releases dated August 13, 1993. Subsurface water at this particular station is between 26 feet and 31 feet.

EOTT proposes the following remediation plan:

1. Soil samples will be taken of area to determine TPH, BTEX, and Benzene levels.
2. Contaminated area (approximately 120' x 200') will be disked 18-24" deep.
3. Approximately 175 lbs. of 24-22-24 fertilizer will be disked into soil.
4. Water will be applied to contaminated area.
5. Area will be disked twice monthly until acceptable levels of TPH (100 ppm), BTEX (50 ppm) and Benzene(10 ppm) are reached.
6. Copies of all analytical work will be sent to the OCD.

Your prompt attention to this matter will appreciated as EOTT would like to begin remediation as soon as possible. If you have any questions or need additional information, please don't hesitate to call me at 915/687-2040 ext. 34.

Sincerely,



Lennah Frost
Environmental & Safety Coordinator

cc: Al Hugh
John Oveson
Jim Davis
Bobby Garduno

RECEIVED

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO
APPROPRIATE DISTRICT
OFFICE IN ACCORDANCE
WITH RULE 116 PRINTED
ON BACK SIDE OF FORM

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR EOT ENERGY PIPELINE LIMITED PARTNERSHIP					ADDRESS 3307 W.C. RD. HOBBS, N. MEX.		TELEPHONE # (505) 392-199	
REPORT OF	FIRE	BREAK	SPILL <input checked="" type="checkbox"/>	LEAK	BLOWOUT	OTHER*		
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* PUMP STATION	
FACILITY NAME: LEA STATION								
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage LEA STATION Hiway 8					SEC. 28	TWP. 20 S	RGE. 37 E	COUNTY LEA
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 2.5 MILES SOUTH OF MONUMENT, N. MEXICO								
DATE AND HOUR OF OCCURRENCE MARCH 15, 1996 6:25 AM				DATE AND HOUR OF DISCOVERY MARCH 15, 1996 7:25 AM				
WAS IMMEDIATE NOTICE GIVEN?		YES <input checked="" type="checkbox"/>	NO	NOT REQUIRED	IF YES, TO WHOM BONNIE PRICHARD			
BY WHOM PAUL NEWMAN				DATE AND HOUR MARCH 15, 1996 7:50 AM				
TYPE OF FLUID LOST CRUDE OIL				QUANTITY OF LOSS 200		VOLUME RECOVERED 170		
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO <input checked="" type="checkbox"/>	QUANTITY				

IF YES, DESCRIBE FULLY**

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
FLANGE STUD BOLTS ON PACKING GLAND SHEARED AND SLIPPED ON PUMP ROD. PUMP SUCTION & DISCHARGE VALVES CLOSED.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
Oil recovered - Placed oily dirt on plastic for remediation

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Pump Station			
SURFACE CONDITIONS	SANDY <input checked="" type="checkbox"/>	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

Dry - Windy - 50°

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Bobby Garduño PRINTED NAME AND TITLE ASST. PIPELINE MANAGER BOBBY GARDUÑO DATE 3-18-96

713-193-5068

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals and Natural Resources Department

SUBMIT 2 COPIES TO
APPROPRIATE DISTRICT
OFFICE IN ACCORDANCE
WITH RULE 116 PRINTED
ON BACK SIDE OF FORM

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR BOTT ADDRESS TELEPHONE

REPORT OF	FIRE	BREAK	SPILL	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*

FACILITY NAME: Sea Station

LOCATION OF FACILITY Qtr/Qtr Sec. or Footage NW SEC. 28 TWP. 30 RGE. 37 COUNTY

DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK approx 6 mi. N Monument Hwy 8 - W Sea

DATE AND HOUR OF OCCURRENCE 3/15/96 6:35 AM DATE AND HOUR OF DISCOVERY 7:50 AM

WAS IMMEDIATE NOTICE GIVEN? YES NO NOT REQUIRED IF YES, TO WHOM Bonne

BY WHOM Paul Newman DATE AND HOUR 3/15/96 7:50 AM

TYPE OF FLUID LOST Crude oil QUANTITY OF LOSS 40-60 VOLUME RECOVERED 2

DID ANY FLUIDS REACH A WATERCOURSE? YES NO QUANTITY

IF YES, DESCRIBE FULLY**
INSP BY cl working on now
INSP DATE 3-26-96
DISTANCE TO WATERCOURSE
No standing water

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
Line pump packing failure shut down pump - using alternate pump until packing is replaced (no cattle)

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
all on facility site

DESCRIPTION OF AREA FARMING GRAZING URBAN OTHER* May remediate on right of way

SURFACE CONDITIONS SANDY SANDY LOAM CLAY ROCKY WET DRY SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED PRINTED NAME AND TITLE DATE