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MISC.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Carol S. Leach **Acting Cabinet Secretary**

Lori Wrotenbery Director Oil Conservation Division

January 24, 2002

CERTIFIED MAIL RETURN RECEIPT NO. 3929-3930

Mr. Wayne Brunette **EOTT Energy Pipeline Partnership** PO Box 1660 Midland, TX 79702

CASE #1R0087 R.L. ROGERS LEAK SITE RE:

Dear Mr. Brunette:

The New Mexico Oil Conservation Division (OCD) has reviewed the following EOTT Energy Pipeline Limited Partnership documents, which were submitted to the OCD by EOTT's consultant Environmental Technology Group, Inc (ETGI.)

- November 21, 2001 correspondence RE R.L. Rogers Release Site
- April 2001 "ANNUAL MONITORING REPORT, EOTT PIPELINE COMPANY, R.L. ROGERS, LEA COUNTY,
- February 2001 "2000 ANNUAL GROUNDWATER MONITORING REPORT, EOTT PIPELINE COMPANY, R.L. ROGERS RELEASE SITE, LEA COUNTY NEW MEXICO."

These documents contain the results of ETGI's ground water monitoring activities following discovery of free phase hydrocarbons on groundwater in November 1999. The document requests closure of the site since ground water has been found in compliance with New Mexico Water Quality Control Commission (WQCC) standards as demonstrated in six consecutive sampling events. The November 12, 2001 document also proposes to plug and abandon the site ground water monitoring wells.

The closure for this site is approved on the condition that the monitor wells be maintained for use as down-gradient control monitoring sites for the Bob Durham project.

Please be advised that OCD approval does not relieve EOTT of responsibility if remaining contaminants are found to pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve

EOTT of responsibility for compliance with any other federal, state, tribal or local laws and regulations. If you have any questions, please email me or call me at (505) 476-3493. so that we can return the card to you. Form 3811, August 2004 item 4 if Restricted Delivery is desired.

Print your name and address on the reverse Attach this card to the back of the Sincerely, Paudoepu Bufers Randolph Bayliss, P.E. Hydrologist Environmental Bureau Chris Williams, OCD Hobbs District Office x¢: Ann Moore, ETGI; Jimmie B. Cooper Dhbt Domestic Rethin Reden Oil Conservation Division * 1220 South Phone: (505) 476-3440 * Fax (505) Is delivery address different from item 1? Restricted Delivery? Service Insured Mail Certified Mail YES, enter delivery address below: Type ☐ Express I ☐ Return R ☐ C.O.D. (Extra Fee) C. Date of Delivery ₫ ĕ *₹*



November 12, 2001

Mr. Bill Olson New Mexico Oil Conservation Division Environmental Bureau 2040 South Pacheco Santa Fe, NM 87505

RE: R.L. Rogers Release Site

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following request for site closure at the R.L. Rogers Release Site in the NE ¼, NW ¼, Section 32, Township 19 South, Range 37 East, in Lea County, New Mexico. As per the Subsurface Investigation Report dated February 2001, the excavation has been backfilled and the site restored to as near original topography as practicable. ETGI has completed the five quarterly ground water sampling events of three site monitor wells. Also, an additional monitor well (MW-4) was installed directly downgradient of the source area and sampled on September 5, 2001, as per New Mexico Oil Conservation Division (NMOCD) correspondence dated July 20, 2001. The analytical data from these monitor wells are all below New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored contaminates of concern (COC).

Please find attached Table 1, a groundwater analytical table with results from five groundwater sampling events, and a laboratory report from the groundwater sampling event on September 5, 2001 which includes data from MW-4. As indicated by the results, no COC was above the NMWQCC limits. Also attached are two figures indicating the location of MW-4 in relation to the other monitor wells at the site.

ETGI is requesting that this site be reconsidered for closure, plugging and abandoning the site monitor wells, and reseeding of the affected areas at the site. A closure report will be submitted following completion of these activities.

Sincerely.

Michael J. Henry

Michiel J. Henry

Environmental Scientist

Encl: TABLE 1 (GROUNDWATER CHEMISTRY)

SEPTEMBER 5, 2001 LABORATORY REPORT

FIGURE 1 (SITE MAP)

FIGURE 2 (SITE GROUNDWATER GRADIENT MAP)

TABLE 1

GROUNDWATER CHEMISTRY

EOTT ENERGY PIPELINE, LP R.L. ROGERS LEA COUNTY, NM ETGI Project # EOT2041C

All concentrations are in mg/L

		SW 846-8021B, 5030						
SAMPLE LOCATION	SAMPLE Date	BENZENE	TOLUENE	ETHYL- BENZENE	M,P- Xylenes	O- XYLENES	TOTAL BTEX	
			·					
MW-1	09/05/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	02/27/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	04/05/00	0.002	<0.001	0.002	0.009	0.005	0.018	
MW-2	09/05/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	02/27/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	04/05/00	0.003	0.011	0.001	0.025	0.003	0.043	
MW-3	09/05/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	02/27/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	11/28/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	08/29/00	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
	04/05/00	0.002	<0.001	<0.001	<0.001	<0.001	0.002	
MW-4	09/05/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
EB-1	09/05/01	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	

P.3



"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.

< 0.001

4

ATTN: MR. KEN DUTTON 2540 W. MARLAND HOBBS, NM 88240 FAX: 505-397-47C1

Sample Type: Water

Sample Condition: Intact/ Iced/ HCI/ 1.0 deg C

Project Name: R.L. Rodgers Project #: EOT 2041C

Project Location: Monument, NM

BLANK

RPD

Sampling Date: 09/05/01 Receiving Date: 09/13/01

Analysis Date: 09/13/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	
			9/2		113972	mg/ c	
0101561-01	MW 1	< 0.001	<0.001	< 0.001	<0.001	<0.001	
0101561-01	MW 2	< 0.001	<0.001	<0.001	<0.001	<0.001	
0101561-01	MW 3	<g 901<="" td=""><td>< 0.001</td><td>< 0.001</td><td>< 0.001</td><td><0.001</td><td></td></g>	< 0.001	< 0.001	< 0.001	<0.001	
0101561-01	MW 4	< 0.001	<0.001	< 0.001	< 0.001	< 0.001	
0101561-01	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001	
	QUALITY CONTROL	0.113	0.111	0.107	0.220	0.102	
	TRUE VALUE	0.100	0.100	0.100	0.200	0.100	
	% L A	113	111	107	110	102	
	SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100	
	ORIGINAL SAMPLE	0.030	0.010	0.001	0.002	0.008	
	SPIKE	0.138	0.113	0.103	0.210	0.108	
	SPIKE DUP	0.131	0.109	0.099	0.203	0.103	
	%EA	108	103	103	104	100	

<0.001

4

METHODS: EPA SW 846-80218 ,5030

<0.001

< 0.001

4

<0.001

5

COC: 127

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Name: RL. Robyers

Project Loc: MUNUMENT NE

PO #:

Project # 60T 2041C

Environmental Lab of Texas, Inc.

12600 West 1.20 East Odessa, Texas 79763

Phone: 915-563-1800 Fax: 915-563-1713

Project Manager: KEN Dust ON IGI Company Name

MARLAND 88240 City/State/7ip: HOBB! KM Company Address: 25 40 W

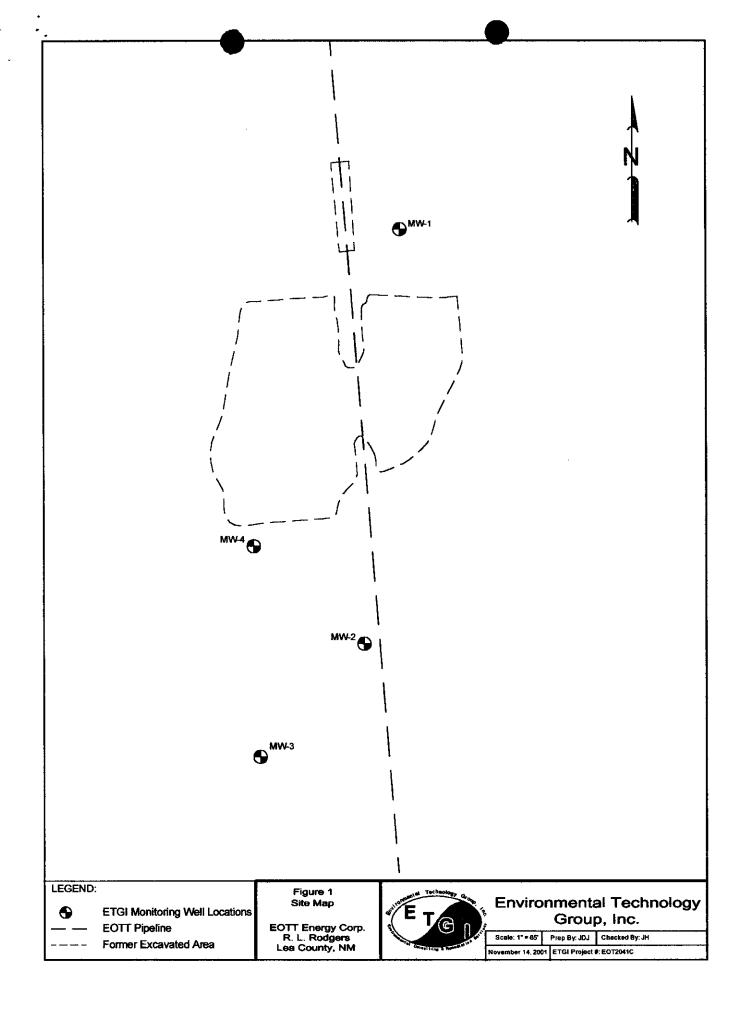
Telaphone No (505) 39 7 - 488 2

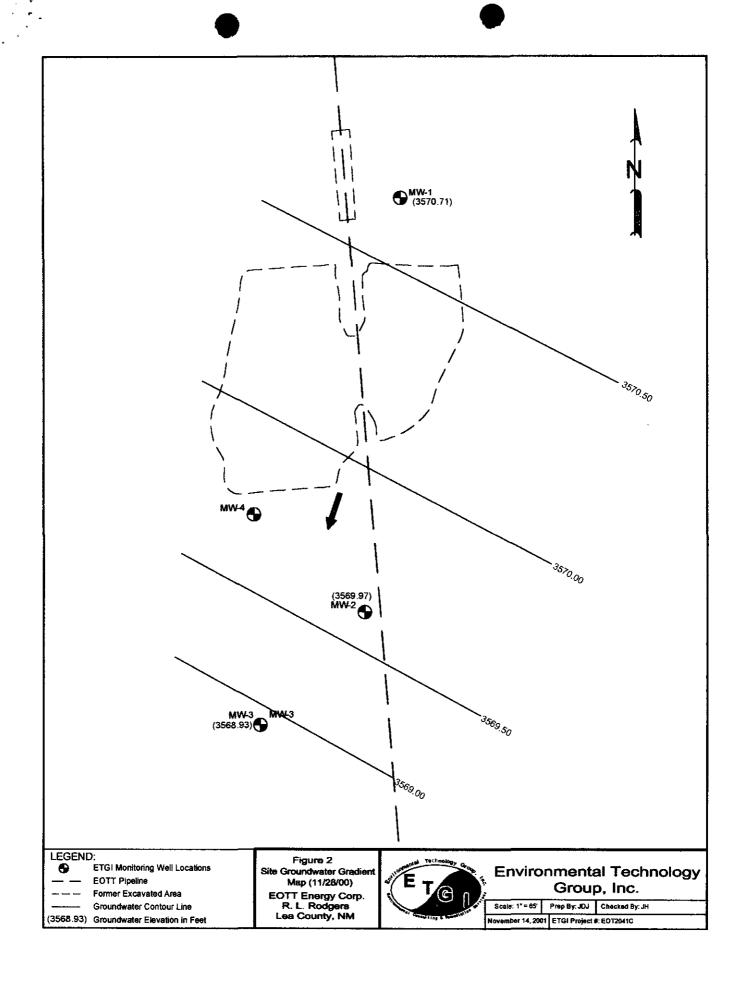
Sampler Signature:

FAIL NO. (505) 39 7-4741

10LP Mairix Preservative

TAT bicboold Talubado&-919) TAT HZUR For Remark: Idas. Sample Containers Intacl? I Week CoT Terriperature Upon Recei 91EX 3021B/155 Semiyoratiles santejoy. Metals As An Ba Cd Cl Ob He Se TPH 6015M GROIDRO 9001/5001 XT H91 1812 Hd1 True DB (842 / 10 / 801 J. J. Omst (2060),3) Soit aGDAIS Date Water Cipe: (Specify) auch OSH ころん нсі QNH No. of Containers 1130 Time Sampled 400 1415 215 1300 -5-0 Received by Date Sampled 4 100 Time Tine 9+3-01 Date Date FIELD CODE MW Y F B . me ME 10-1951010 9 Ğ pecal Instructions: AB If fleb use any Relinguished by Relinguistice by







NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 20, 2001

CERTIFIED MAIL
RETURN RECEIPT NO: 3771-7477

Mr. Wayne Brunette
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: CASE # 1R0087

R.L. ROGERS LEAK SITE

Dear Mr. Brunette:

The New Mexico Oil Conservation Division (OCD) has reviewed the following EOTT Energy Pipeline Limited Partnership (EOTT) documents which were submitted to the OCD on March 12 2001 by their consultant Environmental Technology Group, Inc (ETGI).

- February 28, 2001 correspondence titled "EOTT R.L. ROGERS LEAK SITE".
- February 2001 "ADDITIONAL SUBSURFACE INVESTIGATION REPORT (PURSUANT TO STAGE 1 ABATEMENT PLAN) EOTT ENERGY CORP, R.L. ROGERS RELEASE SITE, LEA COUNTY, NEW MEXICO".
- February 2001 "2000 ANNUAL GROUNDWATER MONITORING REPORT, EOTT PIPELINE COMPANY, R.L. ROGERS RELEASE SITE, LEA COUNTY, NEW MEXICO".
- May 2000 "SUBSURFACE INVESTIGATION REPORT, (STAGE 1 ABATEMENT PLAN) EOTT ENERGY CORP, R.L. ROGERS RELEASE SITE, LEA COUNTY, NEW MEXICO".

These documents contain the results of EOTT's investigation and remediation of contaminated soils and ground water related to a crude oil pipe line spill at the R.L. Rogers Site located in Unit D, Section 32, Township 19 South, Range 37 East, Lea County, New Mexico. The documents also request closure of the site remediation and monitoring actions.

The investigation and remediation work conducted to date is satisfactory. However, a review of the above-referenced documents shows that the existing monitor wells are not directly downgradient of the source area. In addition, there are no ground water monitoring results from the source area that shows that the source area has been remediated. Therefore it cannot be conclusively determined whether ground water contamination at the site has been completely remediated. Therefore, the OCD defers comment on EOTT's closure request and requires that EOTT:

- 1. Install an additional monitor well directly adjacent to and downgradient of the excavated area to determine the ground water quality at the source of the contamination.
- 2. Complete the new monitor well as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
- 3. No less than 24 hours after the well is developed, purge, sample and analyze ground water from all monitor wells for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) using EPA approved methods and quality assurance/quality control (QA/QC).
- 4. Submit the results of this investigation to the OCD by September 20, 2001. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
 - a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table map showing the location of spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.

- d. Isopleth maps for contaminants observed during the investigations.
- e. Summary tables of all ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
- f. The disposition of all wastes generated.

If you have any questions or comments, please contact me at (505) 476-3491.

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

Beth Aldrich, ETGI

OIL CONSERVATION DIV

01 APR 16 PM 3: 16



April 9, 2001

Mr. William C. Olson New Mexico Oil Conservation Division Environmental Bureau 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: R. L. Rodgers Release Site

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following request for site closure at the R.L. Rodgers Release Site in the NE ¼, NW ¼, Section 32, Township 19 South, Range 37 East, in Lea County, New Mexico. As per the Subsurface Investigation Report dated February 2001, the excavation has been backfilled and the site restored to its natural contour. ETGI has completed the four consecutive quarterly ground water sampling events of the three monitoring wells on-site. The analytical data from these monitoring wells are all below New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored contaminates of concern (COC).

Please find attached Table 1, a summary of analytical testing results from May 3, 2000 through February 27, 2001, a period of four consecutive quarterly sampling events. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period.

We are requesting approval for closure of this site, plugging and abandoning the monitoring wells, and reseeding the affected areas at the site. A closure report will follow on completion of these activities.

Sincerely.

Ken Dutton

New Mexico Operations Manager

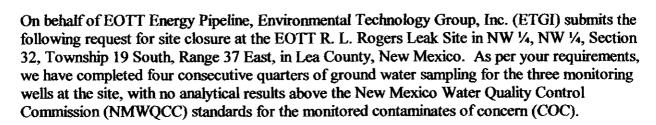
Cc: New Mexico Oil Conservation Division, Hobbs District Office Jerry Nickel, ETGI- Midland Office

February 28, 2001

Mr. Bill Olson New Mexico Oil Conservation Division Environmental Bureau 2040 South Pacheco Santa Fe, NM 87505

RE: EOTT R. L. Rogers Leak Site

Mr. Olson:



Please find enclosed the 2000 Annual Groundwater Monitoring Report, which is a summary of the analytical testing along with groundwater gradient maps for the calendar year 2000, a period of four consecutive quarterly sampling events. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period.

We are requesting approval for closure of this site, plugging and abandoning the monitoring wells, returning the surface to its original contour and reseeding the affected areas at the site. A closure report will follow on completion of these activities.

If you have any questions or comments, please contact me at (505) 397-4882. Thank you.

Sincerely,

Beth Aldrich

Geologist/Sr. Project Manager

Boil alduck

Cc:

EOTT Energy Corp.

Jerry Nickell, ETGI - Midland

ETCI facsimile transmittal

		•		•
□ Urge	nt [] For Review	☐ Please Comment	☐ Please Reply	☐ Please Recycle
CC:				
Re:		Pages:	1	
From:	Jesse Taylor	Date:	6/13/00	
To:	Bill Olsen	Fax:	(505) 827-8177	

Bill As per my messages - will follow up - Thanks - Jesse



June 12, 2000

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

RE: R. L. Rogers Release Site

NE1/4 NW1/4 Section 32, Township 19 South, Range 37 East, Lea County Landowner Mandate/Safety Issues - Excavation Backfill

Dear Mr. Olsen:

As per our my phone messages, I am providing the pertinent data regarding the soil and ground water conditions at the referenced site. The data was collected by Environmental Technology Group, Inc. (ETGI) on behalf of EOTT Energy Corp. (EOTT). These same data will be provided to your office within a short time as a portion of a Stage 1 Abatement Plan. It appears that the excavation has been used for recreational purposes (swimming) and the landowner is concerned about related safety and liability issues. Therefore, we would like to backfill the excavation as soon as possible and would appreciate a timely response from your office.

As the data show, soil conditions around the excavation are below regulatory standards with the exception of that portion of the south wall under the pipeline (sample SS04). Given the present excavation, further excavation in this area would compromise the integrity of the pipeline. Therefore, we propose to backfill the majority of the excavation, in order to shore up the pipeline and then to excavate the impacted area under the pipeline at the south wall.

Ground water conditions are currently below New Mexico WQCC standards. It is doubtful that the recommended actions would adversely impact ground water conditions. If you have any questions or comments, please telephone me at (915) 664-9166.

Tesse Taylor

cc:

Glenn Waldrop - EOTT Energy Corp.

ATTACHMENTS

TABLES

TABLE 1

SUMMARY OF SOIL CHEMISTRY BORING SAMPLES R.L. RODGERS LEAK SITE LEA COUNTY, NM ETGI PROJECT# EOT1041C

				Methods: El	PA SW 846-8	021B, 5030		Meth	
SAMPLE LOCATION	SAMPLE	PLE SAMPLE DEPTH	DENZENC	TOLLIENE	ETHYL-	m,p-	0-	EPA SW 846-8015M GRO/DRO	
	DATE	(feet)	BENZENE (mg/kg)	TOLUENE (mg/kg)	BENZENE (mg/kg)	XYLÉNE (mg/kg	XYLENE (mg/kg)	GRO C6-C10 (mg/kg)	DRO >C10-C26 (mg/kg)
MW-1	02/07/00	20'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
MW-2	02/07/00	20'	< 0.100	<0.100	<0.100	0.170	<0.100	<10	<10
MW-3	02/07/00	15'	<0.100	<0.100	<0.100	0.107	<0.100	<10	<10
SSO1/East Wall- 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
SSO2/SE Corner-17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
SSO3/South Wall East-17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0,100	<10	<10
SSO4/South Wall P/L-17' bgs	05/03/00	17′	<q.100< td=""><td>0.101</td><td><0.100</td><td>0.108</td><td><0.100</td><td><10</td><td>290</td></q.100<>	0.101	<0.100	0.108	<0.100	<10	290
SSO5/South Wall West-17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	10
SSO6/West Wall- 17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	0.109	<0.100	<10	<10
SSO7/North Wall West-17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
SSO8/North East-17' bgs	05/03/00	17'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10

TABLE 2 GROUND WATER ELEVATION DATA R.L. ROGERS SITE LEA COUNTY, NM ETGI PROJECT# EOT1041C

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	02/22/00	3593.22	•	22.53	0.00	3570.69
	04/05/00			22.51	0.00	3570.71
MW-2	02/22/00	3591.20	-	21.55	0.00	3569.65
	04/05/00			21.55	0.00	3569.67
MW-3	02/22/00	3588.85		19.98	0.00	3568.87
	04/05/00			19.98	0.00	3568.93

TABLE 3

SUMMARY OF GROUND WATER CHEMISTRY
R. L. RODGERS LEAK SITE
LEA COUNTY, NM
ETGI PROJECT# EOT1041C

	Г	~	Γ					
3, 310, 160.1	SQL	(mg/L)	69/		992		975	
		(mg/L)	220		330		335	
Methods: EPA 375.4. 325.3, 310, 160.1	CARBONATE	(mg/L)	0		0		0	
Methods:	CHLORIDE	(ш <i>g</i> /L)	170		163		195	
	SULFATE	(mg/L)	206		186		230	
0	ó	XYLENE (mg/L)	<0.001	0.005	<0.003	0.003	0.002	<0.001
021B, 503	-ď·W	XYLENE (mg/L)	<0.001	600'0	<0.001	0.025	0.002	<0.001
ethods: EPA SW 846-8021B, 5030	ETHYL	BENZENE (mg/L)	<0.001	0.002	<0.001	0.001	<0.001	<0.001
ethods: EF	TOLUENE	(mg/L)	0.001	<0.001	0.001	0.011	0.002	<0.001
W	BENZENE	(mg/L)		0.002	<0.00	0.003	900.0	0.002
SAMPLE SAMPLE	DATE		02/23/00			_	02/23/00	04/02/00
SAMPLE	LOCATION		1-WW		MW-2		WW-3	

TABLE 4

ADDITIONAL GROUND WATER CHEMISTRY R. L. RODGERS LEA COUNTY, NM ETGI PROJECT # EOT1041C

Analyte (mg/L)	MW-1 02/23/00	MW-2 02/23/00	MW-3 02/23/00	Reporting Limit
Naphthalene	ND	ND	ND	0.005
Acenaphthylene	ND	ND	ND	0.005
Acenaphthene	ND	ND	ND	0.005
Fluorene	ND	ND	ND	0.005
Phenanthrene	ND	ND	ND	0.005
Anthracene	ND	ND	ND	0.005
Fluoranthene	ND	ND	ND	0.005
Pyrene	ND	ND	ND	0.005
Benzo[a]anthracene	ND	ND	ND	0.005
Cyrysene	ND	ND	ND	0.005
Benzo[b]fluoranthene	ND	ND	ND	0.005
Benzo[k]fluoranthene	ND	ND	ND	0.005
Benzo[a]pyrene	ND	ND	ND	0.005
Indeno[1,2,3-odjpyrene	ND	ND	ND	0.005
Dibenz[a,h]anthracene	ND	ND	ND	0.005
Benzo[g,h,l]perylene	ND	ND	ND	0.005

ND = Below Reporting Limit

METHOD: EPA SW846-8270C, 3510

TABLE 4

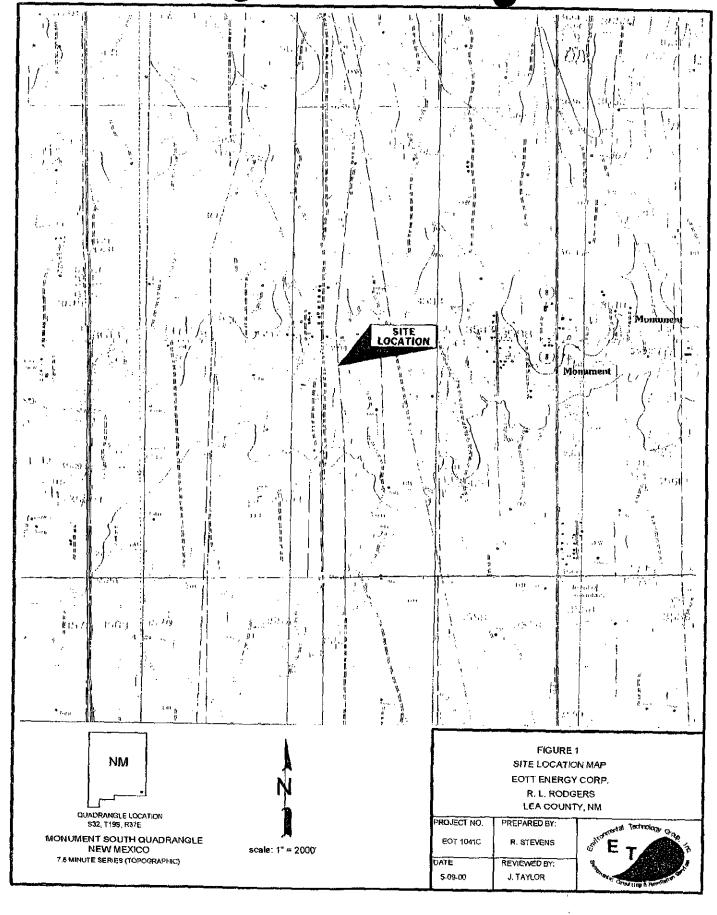
ADDITIONAL GROUND WATER CHEMISTRY R. L. ROGERS LEAK SITE LEA COUNTY, NM ETGI PROJECT# EOT1041C

Analyte (mg/L)	MW-1 02/23/00	MW-2 02/23/00	MW-3 02/23/00	REPORTING LIMIT
Atuminum	0.2530	2.640	4.680	0.0500
Arsenic	ND	ND	0.0080	0.0500
Barium	0.1410	0.2440	0.1830	0.0100
Beryllium	ND	ND	ND	0.0040
Cadmium	ND	ND	ND	0.0040
Calcium	139.0	248.0	256.0	1.000
Chromium	ND	0.0080	0.0110	0.0050
Cobalt	ND	ND	ND	0.0200
Copper	ND	ND	ND ND	0.0100
Iron	0.2600	1.680	3.240	0.0500
Lead	ND	ND	ND	0.0030
Magnesium	23.90	24.50	34.50	1.000
Manganese	0.0490	0.0590	0.1120	0.0150
Mercury	ND	ND	ND	0.00020
Molybdenum	ND	ND	ND	0.050
Nickel	ND	ND	ND	0.0100
Potassium	6.310	6.920	7.340	1.000
Selenium	0.0050	ND	ND	0.0050
Silver	ND	ND	ND	0.00500
Sodium	91.70	117.0	176.0	1.000
Tin	ND	ND	ND	0.0500
Vanadium	ND	0.0270	0.0350	0.0200
Zinc	ND	0.0550	0.0700	0.0200
Boron	0.161	0.188	0.275	0.050
Strontium	1.33	1.29	1.70	0.050

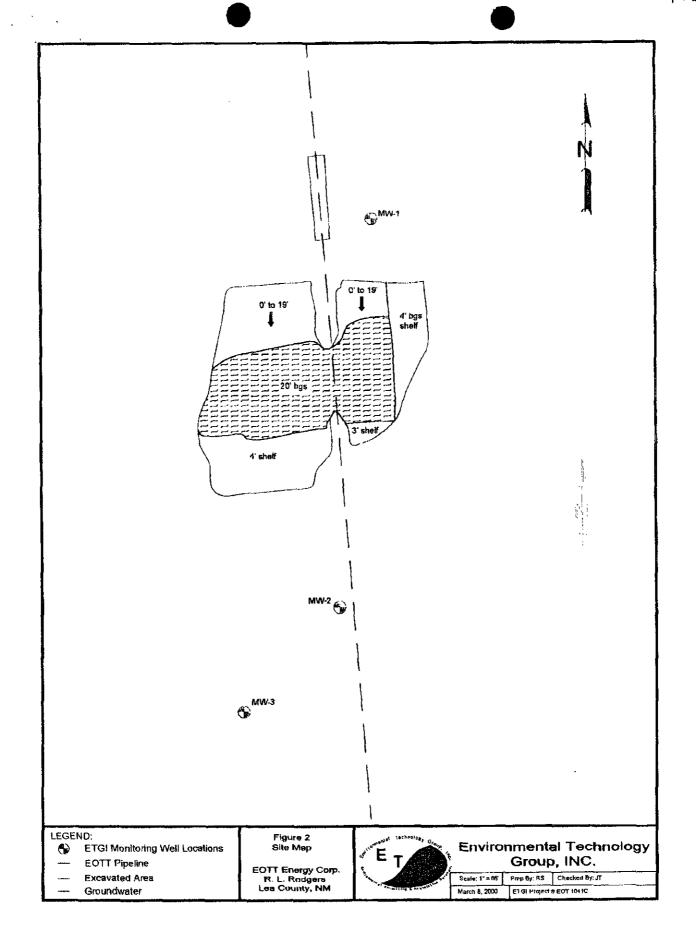
ND = Below Reporting Limit

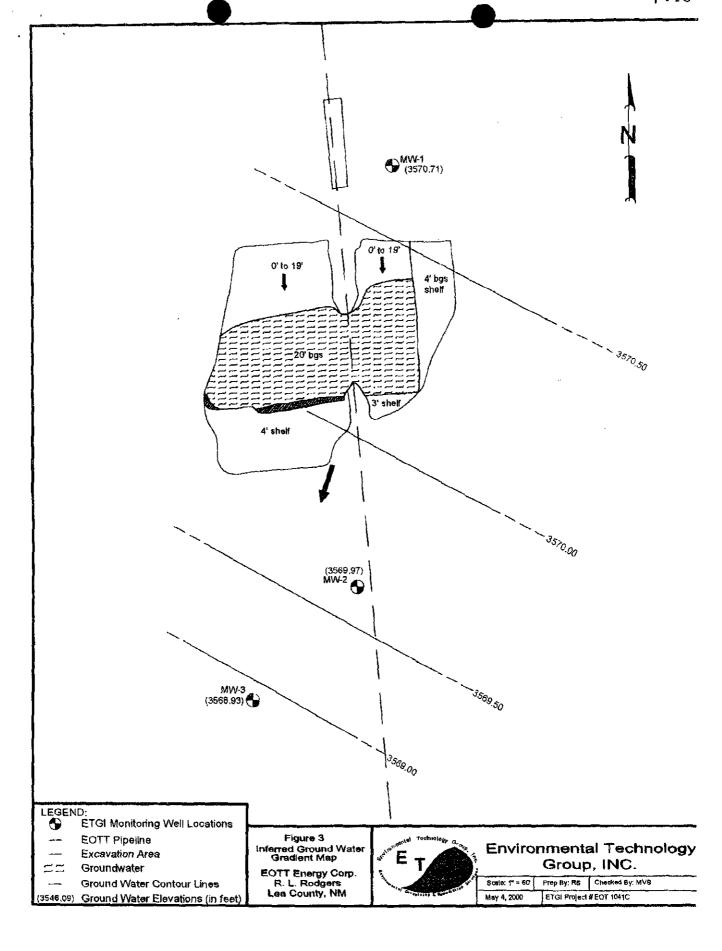
METHOD: EPA SW846-6010B, 7470

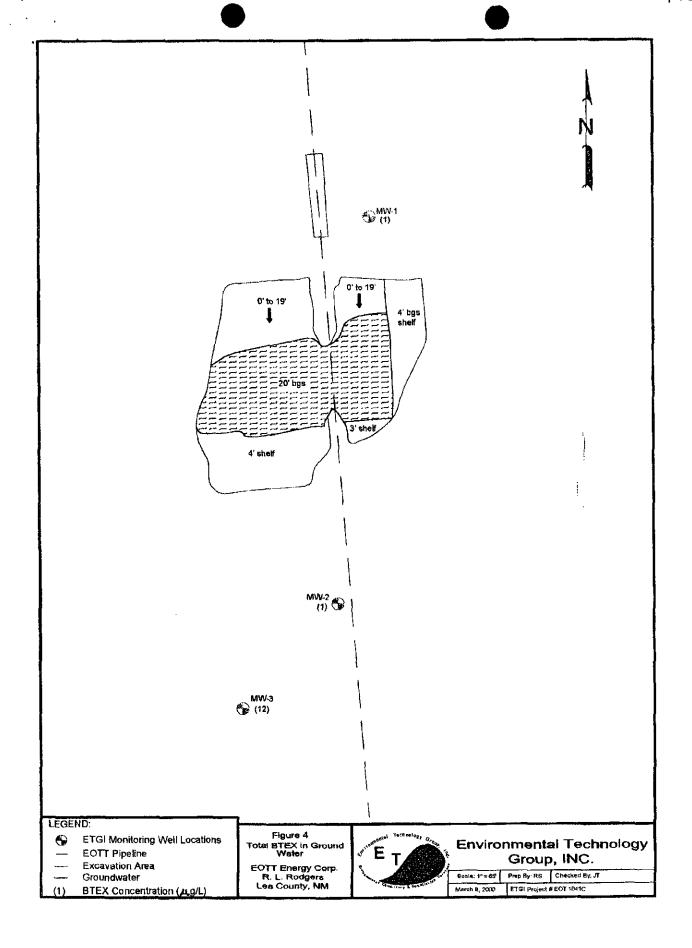
FIGURES

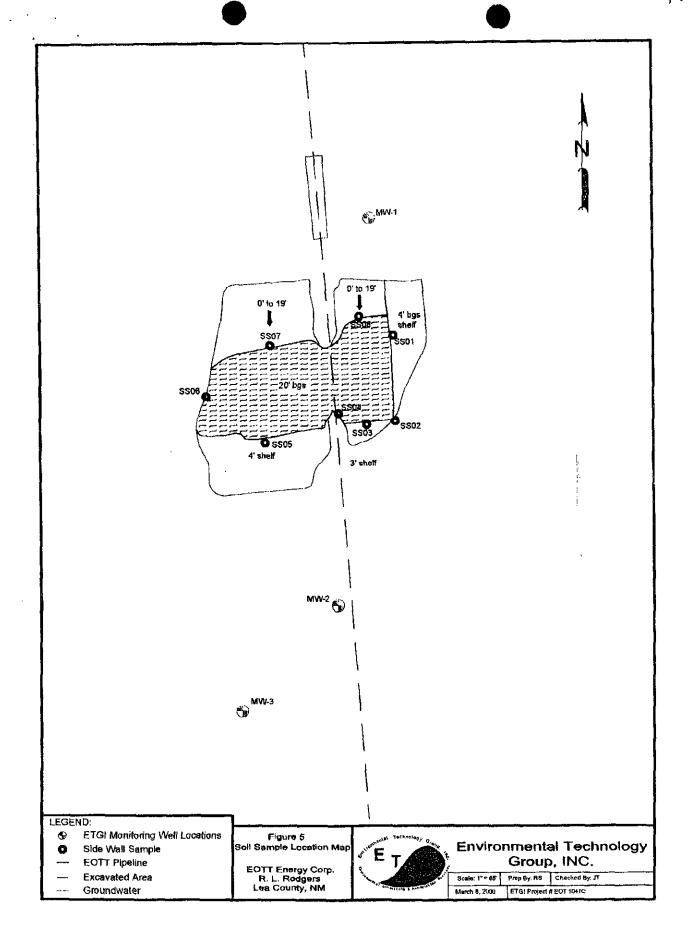


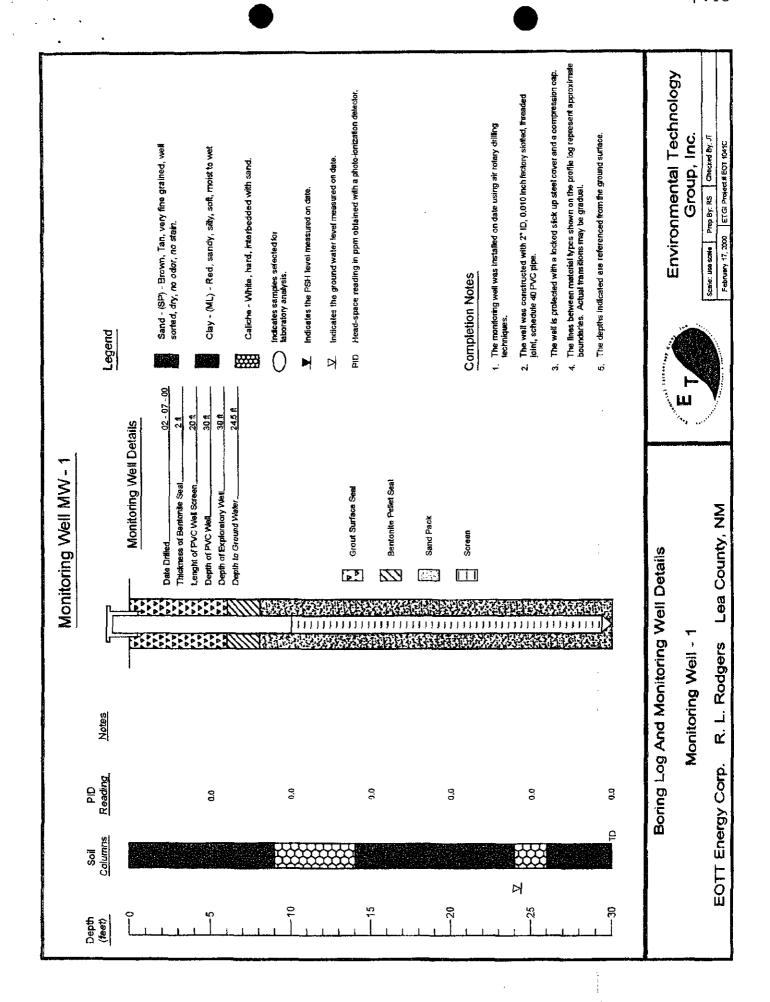
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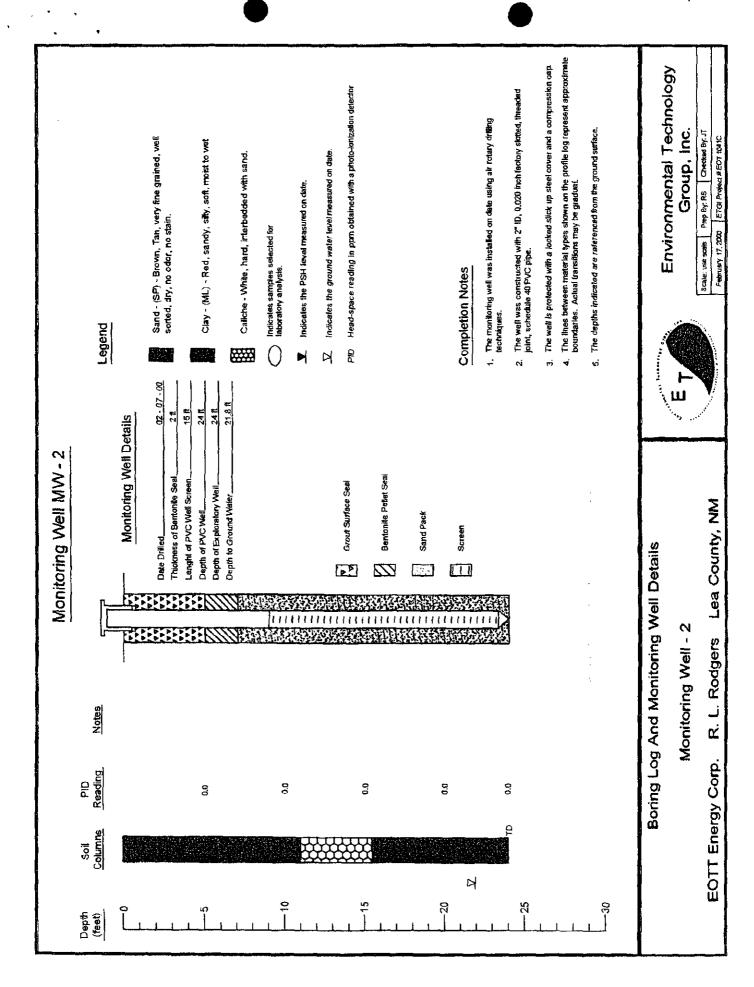


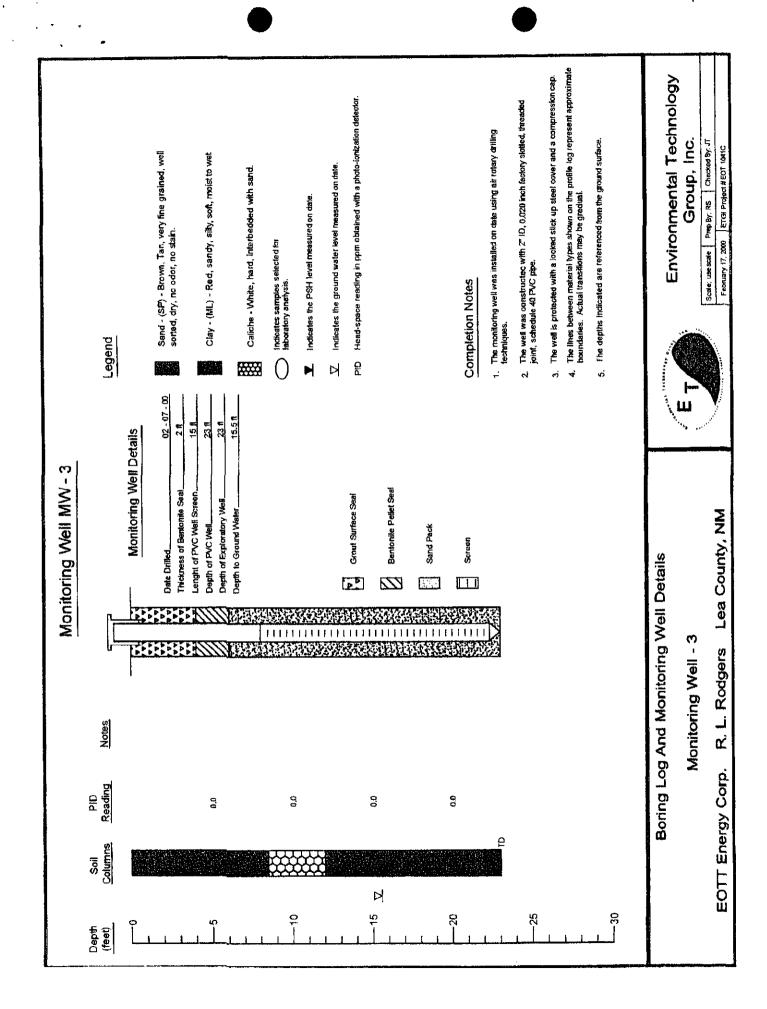












Olson, William 1996

From:

Olson, William

Sent:

Thursday, July 27, 2000 9:48 AM

To:

'Glenn Waldrop@eott.com'

Subject:

RE: CALICHE FROM R.L. ROGERS SITE

The below referenced request is approved.

From: Glenn Waldrop@eott.com [SMTP:Glenn Waldrop@eott.com]

Sent: Tuesday, July 25, 2000 12:40 PM

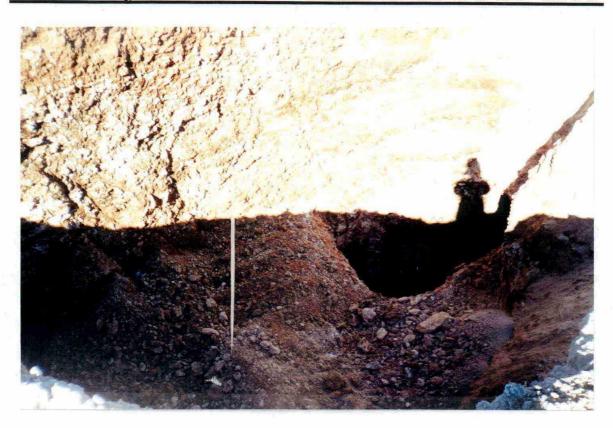
To: Olson, William

Subject: CALICHE FROM R.L. ROGERS SITE

Importance: High

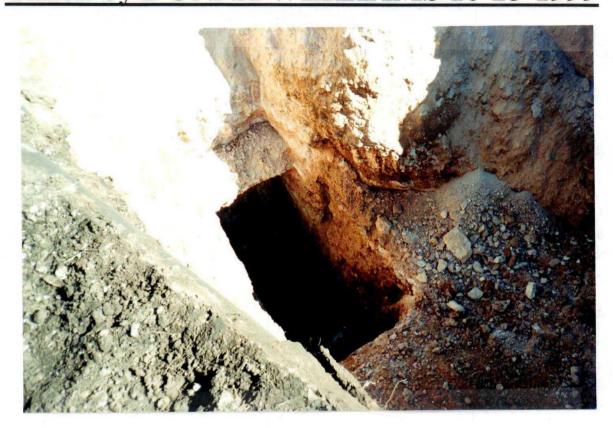
Per your discussion with Wayne Brunette, we would like to take the leftover caliche from the R.L. Rogers leak site to use as backfill on the Texaco Saunders site. The analyticals indicate the TPH to be below 100 ppm. Texaco is agreeable to accept this material as long as the state agrees with this in writing. Do we have permission to proceed? Thanks for your consideration.

EOTT - R.L. ROGERS/RL BYRD UL N-SEC 31-Ts19S-R37E Taken by DONNA WILLIAMS 10-25-1999





EOTT - R.L. ROGERS/RL BYRD UL N-SEC 31-Ts19S-R37E Taken by DONNA WILLIAMS 10-25-1999





R.L. ROGERS EOTT ENERGY CORP Taken by DONNA WILLIAMS 1999





R.L. ROGERS EOTT ENERGY CORP Taken by DONNA WILLIAMS 1999





R.L. ROGERS EOTT ENERGY CORP Taken by DONNA WILLIAMS 1999

