MISC.

CORRESPONDENCE

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

Lori Wrotenbery
Director
Oil Conservation Division

May 8, 2003

Mr. William Von Drehle, Director Environmental
EOTT ENERGY LLC
P.O. Box 4666
Houston, Texas 77210-4666

RE: CASE #1R 0089 LEO (FLAP) SIMS

Dear Mr. Von Drehle:

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

- April 2001 "ANNUAL MONITORING REPORT, EOTT PIPELINE COMPANY, LEO (FLAP) SIMS, LEA COUNTY, NEW MEXICO."
- April 2002 "ANNUAL MONITORING REPORT, EOTT PIPELINE COMPANY, LEO (FLAP) SIMS LEA COUNTY, NEW MEXICO."
- April 2003 "ANNUAL MONITORING REPORT, EOTT ENERGY, LLC, LEO (FLAP) SIMS, LEA COUNTY NEW MEXICO, NE4, SE4 SECTION 27, TOWNSHIP 19 SOUTH, RANGE 37 EAST"

These documents contain the results of ETGI's ground water monitoring activities of a single monitoring well on this site. Quarterly sampling since June 2000 has shown the ground water to be in compliance with New Mexico Water Quality Control Commission (WQCC) standards as demonstrated in twenty-one consecutive sampling events.

The closure for this site **is approved on the condition that the monitor well be properly plugged and abandoned according to standard industry practices.**

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.

Sincerely,

Randolph Bayliss

Randolph Bayliss, P.E.
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Leo (Flap) Sims

July 20, 2001

Environmental Technology Group, Inc.
ETGI
Environmental Consulting & Remediation Services
OIL CONSERVATION DIV.
01 JUL 23 PM 1:16

RK 11/6

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

RE: 2000-10608 Leo (Flap) Sims Release Site 1R 89
ETGI Project No. EOT2048C

Dear Mr. Olson:

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corporation (EOTT) submits the following request for the closure of the subsurface investigation and remediation at the Leo (Flap) Sims leak site in the NE ¼, SE ¼, Section 27, T-19-S, R-35-E, in Lea County, New Mexico.

As per the Annual Monitoring Report filed in April 2001, three quarterly and consecutive sampling events from the one Monitor Well, MW-1, were shown to be below New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored Contaminates of Concern (COC). Since that filing, two additional quarterly groundwater samples have been tested and found to be below those same thresholds. Please refer to the attached Table 1 for analytical results and dates on the referenced samples. Also attached are the analyticals and chain of custody documents for the lab samples.

Due to this additional proof of no impact to the groundwater at this leak site, ETGI is respectfully requesting that groundwater monitoring be discontinued and that the subsurface investigation and remediation at this site be closed. The hydrocarbon impacted soils will be excavated and treated ex-situ until the remediation action levels for soil contaminates have been reached as required by NMOCD.

If further information or documentation is needed to grant this request, please communicate your needs to me at (915) 522-1139 or via email at amoore@etgi.cc

Sincerely,
Environmental Technology Group, Inc.

C. Ann Moore

C. Ann Moore
Staff Regulatory Specialist

Enclosures

cc: New Mexico Oil Conservation Division, Hobbs District Office
Wayne Brunette, EOTT Energy Corp.
Mike Kelly, EEOTT Energy Corp.
Cutty Cunningham, Enron Transportation and Services Company
Ken Dutton, ETGI Hobbs Office
ETGI Midland Files

Table 1

CONTAMINANTS OF CONCERN IN GROUNDWATER

EOTT Energy
Leo (Flap) Sims
Lea County, New Mexico
ETGI Project # EOT2048C

All concentrations are in mg/L

SAMPLE DATE	SAMPLE LOCATION	SW 846-8021B, 5030						EPA 375.4, 325.3, 310, 160.1				
		BENZENE	TOLUENE	ETHYL-BENZENE	M,P-XYLENES	O-XYLENES	BTEX	SULFATE	CHLORIDE	CARBONATE	BICARBONATE	TDS
06/03/2000	MW -1	0.002	0.001	<0.001	<0.001	<0.001	0.003	99	303	0	216	942
08/31/2000	MW -1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001					
11/20/2000	MW -1	0.004	0.006	<0.001	0.008	0.003	0.021					
02/27/2001	MW -1	0.004	0.006	<0.001	0.001	0.004	0.01					
05/31/2001	MW -1	0.0062	0.0028	<0.001	0.0178*		0.0268					

* M,P & O Xylenes

ENVIRONMENTAL LAB OF TEXAS, INC.

"Don't Treat Your Soil Like Dirt!"

DRAFT

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 32 deg. F
Project #: EOT 2048C
Project Name: Leo (Flap) Sims
Project Location: Lea County, N.M.

Sampling Date: 06/03/00
Receiving Date: 06/03/00
Analysis Date: 06/05/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
26255	MW 1	0.002	0.001	<0.001	<0.001	<0.001
% IA		96	94	96	104	96
% EA		94	94	94	100	92
BLANK		<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030

Umesh Rao
Umesh Rao, Ph. D.

6/7/00
Date

ENVIRONMENTAL LAB OF TEXAS, INC.

DRAFT

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN. MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX 505-392-3760
FAX 915-520-4310

Sample Type: Water
Sample Condition: Intact/ Iced/ 32 deg F
Project #: EOT 2048C
Project Name: Leo (Flap) Sims
Project Location: Lea County, N.M.

Sampling Date: 06/03/00
Receiving Date: 06/03/00
Analysis Date: See Below

ELT#	FIELD CODE	Sulfate mg/L	Chloride mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L
26255	MW-1	99	303	0	216	942
QUALITY CONTROL		56.0	5495	*	*	*
TRUE VALUE		50.0	5000	*	*	*
% PRECISION		108	110	*	*	*
ANALYSIS DATE		06/06/00	06/06/00	06/06/00	06/06/00	06/05/00

METHODS: EPA 375.4, 325.3, 310, 160.1

Umesh Rao
Umesh Rao, Ph.D.

6/7/00
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East Odessa, Texas 79763
(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST
COC 148

Project Manager: JESSE TAYLOR
Phone #: (505) 392-8731
FAX #: (505) 392-3760

Company Name & Address: ETGI
PO BOX 4845 MIDLAND TX

Project #: EOT 2048C
Project Name: LEO (FLAP) SIMS

Project Location: LEA COUNTY NM
Sampler Signature: [signature]

ANALYSIS REQUEST

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	MATRIX: SOIL	MATRIX: AIR	MATRIX: SLUDGE	MATRIX: OTHER	PRESERVATIVE METHOD: HCL	PRESERVATIVE METHOD: HNO3	PRESERVATIVE METHOD: ICE	PRESERVATIVE METHOD: NONE	PRESERVATIVE METHOD: OTHER	SAMPLING: DATE (2000)	SAMPLING: TIME	BTEX 8021	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS 160.1	RCI	PAH 8100	CATIONS 6010	ANIONS 300.0	HEAVY METALS 6010
26255	MW1	5	1/2	X					X	X	X			6-3	0910	X						Y		X	Y	Y	X

Relinquished by:	Date:	Times:	Received by:
[signature]	6-3-00	1630	[signature]
Relinquished by:	Date:	Times:	Received by:
Relinquished by:	Date:	Times:	Received by Laboratory:

REMARKS
FAX RESULTS: HOBBS OFFICE
INVOICE EOTT 10 TM
32 °F
RUSH as per Wayne Brunk
06-05-00 0930

DRAFT

ENVIRONMENTAL LAB OF TEXAS, INC.

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ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

SampleType: Water
Sample Condition: Intact/ Iced/ HCl/ 30 deg. F
Project #: EOT 2048C
Project Name: Flapp Simms
Project Location: Lea Co., N.M.

Sampling Date: 08/31/00
Receiving Date: 09/01/00
Analysis Date: 09/06/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTEX mg/L
30316	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30317	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
% IA		96	94	96	98	92	
% EA		95	94	95	95	91	
BLANK		<0.001	<0.001	<0.001	<0.001	<0.001	

METHODS SW 846-8021B,5030

Raland K. Tuttle

Raland K. Tuttle

9-12-00
Date

Environmental Technology Group, Inc.
ETGI
Environmental Chemistry & Remediation Services

4600 West Wall
Midland, TX 79703
Tel (915) 522-1139
Fax (915) 520-4310

2540 West Marland
Hobbs, NM 88242
Tel (505) 397-4602
Fax (505) 397-4701

EOTT ENERGY CORP
5805 East Business 20
Midland, TX 79707
Tel (915) 687-3400
Fax (915) 582-2761

For Use On **EOTT ENERGY CORP.** Projects Only

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST
(Circle or Specify Method No.)

COC 217

Project Manager: BETH ALDRICH

Project Name: FLAP SIMMS

Project Number: EOT 2048C

Project Location: LEA COUNTY NM

Sampler Signature: Lenny Casas

LAB # (Lab Use Only)	FIELD CODE	CONTAINERS	Volume/Amount	MATRIX: WATER	MATRIX: SOIL	MATRIX: AIR	MATRIX: SLUDGE	PRESERVATION METHOD: HCL	PRESERVATION METHOD: HNO_3	PRESERVATION METHOD: $NaHSO_4$	PRESERVATION METHOD: ICE	PRESERVATION METHOD: OTHER	SAMPLING DATE	SAMPLING TIME	BTEX 8021B	TPH 418.1/TX 1005	TPH 8015M GRO/DRO	TPH 8015M Ext. Range (C6-C44) only	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/7470	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	Chlorides 9250B	Sem Volatiles 8270C	TDS 160.1	Carbonate/Bicarbonate 310.1/325.3						
30316	MW1	[illegible]	[illegible]	X				X					8-31	1010	X																	
30317	EB1	2	V	X				X			X		8-31	1020	X																	

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Lenny Casas	9-1-00	1400			
Relinquished by:	Date:	Time:	Received at Lab by:	Date:	Time:
[illegible]	9-1-00	1900	[illegible]	9-1-00	1705

REMARKS:
MAIL RESULTS EOTT
INVOICE: EOTT
FAX RESULTS

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ENVIRONMENTAL LAB OF , INC.

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ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-397-4701

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ -3 deg. C
Project #: EOT 2048C
Project Name: Leo (Flap) Sims
Project Location: Lea County, N.M.

Sampling Date: 11/20/00
Receiving Date: 11/22/00
Analysis Date: 11/24/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
34218	MW 1	0.004	0.006	<0.001	0.008	0.003
34219	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001
	%IA	86	88	91	96	89
	%EA	91	100	102	108	97
	BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B ,5030

Raland K. Tuttle

12-5-00
Date

Environmental Lab of Texas, Inc.

(915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

COC # 276

Project Manager: BETH ALDRICH

Phone #: (505) 397-4882

FAX #: (505) 397-4701

Company Name & Address: ETGI
2540 W MARLAND HOBBS NM

Project #: EOT 2048C

Project Name: LEO (FLAP) SIMS

Project Location: LEA COUNTY, NM

Sampler Signature: Simon Casas

ANALYSIS REQUEST

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	PRESERVATIVE METHOD: HCL	HNO3	ICE	NONE	OTHER	SAMPLING: DATE 2000	TIME	BTEX 8020/[illegible]	TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS 160.1	RCI	CATIONS 6010	ANIONS 300.0	HEAVY METALS 6010	PAH 8100
	MW 1	5	V.5	X					X	X	X			11-20	1130	X						X		X	X	X	X
	EB 1	2	V						X		X			↓	1145	X											

Relinquished by:	Date:	Time:	Received by:
Simon Casas	11-22-00	0800	Steven Baggs
Steven Baggs	11-22-00	11:25	[illegible]
			Received by Laboratory:

REMARKS -3C

INVOICE: EOTT

FAX RESULTS: HOBBS OFFICE

MAIL RESULTS: EOTT

ENVIRONMENTAL LAB OF TEXAS, INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-397-4701
FAX: 915-520-4310

Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ -0.5 deg C
Project #: EOT 2048C/ 2000-10608
Project Name: Leo "Flap" Sims
Project Location: Lea County, N.M.

Sampling Date: 02/27/01
Receiving Date: 03/02/01
Analysis Date: 03/02/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
37856	MW 1	0.004	0.006	<0.001	0.010	0.004
37857	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001
%IA		94	99	105	109	103
%EA		90	94	98	102	99
BLANK		<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B ,5030

Raland K. Tuttle

3-5-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713

Ø25 Page of

Environmental Technology Group, Inc.

For Use On **EOTT ENERGY CORP.** Projects Only

4800 West Wall
Midland, TX 79703
Tel (915) 522-1139
Fax (915) 520-4310

2540 West Marland
Hobbs, NM 88242
Tel (505) 397-4882
Fax (505) 397-4701

EOTT ENERGY CORP.
East Business 20
TX 79702
(915) 687-3400
(915) 562-2761

5805
Midland,
Tel
Fax

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Project Manager: JESSE TAYLOR

Project Name: LEO "FLAP" SIMS

Project Location: LEA COUNTY NM

EOTT Leak Number: 2000-10608

ETGI Project Number: EOT 2048C

Sampler Signature: Simon Casas

ANALYSIS REQUEST (Circle or Specify Method No.)

LAB # (Lab Use Only)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX: WATER	MATRIX: SOIL	MATRIX: AIR	MATRIX: SLUDGE		PRESERVATION METHOD: HCL	PRESERVATION METHOD: HNO_3	PRESERVATION METHOD: $NaHSO_4$	PRESERVATION METHOD: ICE	PRESERVATION METHOD: NONE		SAMPLING: DATE 2001	SAMPLING: TIME	BTEX 8021B/8020	TPH 418.1/TX 1005	TPH 8015M GRO/DRO	PAH 8270C (8100 New Mexico only)	Total Metals Ag As Ba Cd Cr Pb Se Hg 8010B/7470	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	Volatiles 8260B	Semi Volatiles 8270C	TDS 160.1	Cations/Anions 375.4/325.3
37856	MW 1	2	V	X					X			X			2-27	1300	X											
37857	EB 1	↓	↓	↓					↓			↓			↓	1330	↓											

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Simon Casas	3-2-01	1505			
Relinquished by:	Date:	Time:	Received at Lab by:	Date:	Time:
			[signature]	3-2-01	15:05

REMARKS:
FAX RESULTS: HOBBS OFFICE
MAIL RESULTS: EOTT
INVOICE: EOTT
-0.5°C

© Environmental Technology Group, Inc.

TraceAnalysis, Inc. 6701 Aberdeen Ave., Suite 9 Lubbock, TX 79424-1515 (806) 794-1296

Report Date: May 31, 2001 Order Number: A01052220 Page Number: 1 of 1
EOT 2048C LEO (Flap) Sims Lea County

Summary Report

Ken Dutton
ETGI
2540 W. Marland
Hobbs, NM

Report Date: May 31, 2001

Order ID Number: A01052220

Project Number: EOT 2048C
Project Name: LEO (Flap) Sims
Project Location: Lea County

Sample	Description	Matrix	Date Taken	Time Taken	Date Received
171693	MW-1	Water	5/14/01	16:00	5/22/01
171694	EB1	Water	5/14/01	16:15	5/22/01

This report consists of a total of 1 page(s) and is intended only as a summary of results for the sample(s) listed above

	BTEX				
Sample - Field Code	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	M,P,O-Xylene (mg/L)	Total BTEX (mg/L)
171693 - MW-1	0.0082	0.0028	<0.001	0.0178	0.0268
171694 - EB1	<0.001	0.001	<0.001	<0.001	0.001

COC 056 Page 1 of 1

6701 Aberdeen Avenue, Ste. 9
Lubbock, Texas 79424
Tel (806) 794-1296
Fax (806) 794-1298
1 (800) 378-1296

TraceAnalysis, Inc.

155 McCutchen, Suite H
El Paso, Texas 79932
Tel (915) 585-3443
Fax (915) 585-4944
1 (888) 588-3443

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: ETGT
Phone: (505) 397-4882
Address: (Street, City, Zip) 2540 W MARLAND HOBBS NM
Fax #: (505) 397-4701
Contact Person: KEN DUTTON
Invoice to: (if different from above) EOTI
Project #: EOT 2048C
Project Name: LEO (FLAP) Sims
Project Location: LEA COUNTY, NM
Sampler Signature:

ANALYSIS REQUEST
(Circle or Specify Method No.)

Lab # (Lab Use Only)	Field Code	# Containers	Volume/Amount	Matrix: Water	Soil	Air	Sludge	Preservative Method: HCl	HNO_3	H_2SO_4	NaOH	Ice	None	Sampling Date (2001)	Time	MTBE 8021B/602	BTEX 8021B/602	TPH 418.1/TX1005	PAH 8270C	Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/200.7	TCLP Metals Ag As Ba Cd Cr Pb Se Hg	TCLP Volatiles	TCLP Semi Volatiles	TCLP Pesticides	RCI	GC/MS Vol 8260B/624	GC/MS Semi Vol 8270C/625	PCB's 8082/608	Pesticides 8081A/608	BOD, TSS, pH	Turn Around Time if different from standard	Hold
	MW 1+	2	V	X				X				X		5-14	1600		X															
	EB1	↓	↓	↓				↓				↓		↓	1615		X															

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
[signature]	5-14-01	1800	Todd Bailey	5-14-01	8:20
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	[illegible]		

LAB USE ONLY
Received on Ice: Y/N
Temperature: 4.0
Cooler Present: Y/N

REMARKS:
* ~~[illegible]~~ sediment in vial
Only 1 labelled MW1

Check if Special Reporting Limits Are Needed

Carrier # Fed Ex 902 591 5448

Submittal of samples constitutes agreement to Terms and Conditions listed on reverse side of C.O.C

ORIGINAL COPY

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 31, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: 5051-3747

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

RE: SOIL REMEDIATION WORK PLAN
LEO (FLAP) SIMS SITE
LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership (EOTT) September 29, 2000 "LEO (FLAP) SIMS REMEDIATION WORK PLAN" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains the results of EOTT's investigation of soil and ground water contamination resulting from a crude oil pipeline spill at the Leo (Flap) Sims site located in the NW/4, NW/4 of Section 27, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico. The document also contains EOTT's proposed plan for remediation of contaminated soils.

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

1. A ground water sample shall be obtained from the site monitoring well prior to removal of the well during excavation. The sample shall be obtained and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX) using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

2. All soil samples shall be obtained and analyzed using EPA approved methods and QA/QC procedures.

3. EOTT shall submit a comprehensive report on all investigation and remediation actions to the OCD Santa Fe Office by December 31, 2000 with a copy provided to the OCD Hobbs District Office. The report shall include:

   a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.

   b. Maps showing the location of the spill area, pipeline, sample locations, excavated areas, monitor wells and any other pertinent site features.

   c. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC.

   d. The disposition of all wastes generated.

Please be advised that OCD approval does not limit EOTT to the proposed work plan should the plan fail to adequately remediate 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, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Beth A. Aldrich, Environmental Technology Group, Inc.