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#### RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION FOR ADDITIONAL INFORMATION

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#### EOTT ENERGY CORP. TNM 98-02 LEA COUNTY, NEW MEXICO

RECEIVED

#### FEB 2 8 2001

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Prepared For: EOTT Energy Corp. 5805 East Highway 80 Midland, Texas 79701

Environmental Technology Group, Inc. Project No. EOT2068C

Prepared By: Environmental Technology Group, Inc. (ETGI) 2540 West Marland Blvd. Hobbs, New Mexico 88240

January 26, 2001

#### RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION FOR ADDITIONAL INFORMATION

#### TNM 98-02 Lea County, New Mexico January 26, 2001 Prepared By: ETGI

#### INTRODUCTION

Environmental Technology Group, Inc. (ETGI) hereby submits this additional information to the New Mexico Oil Conservation Division (NMOCD) on behalf of EOTT Energy Corp. (EOTT) on the TNM 98-02leak site. This information was requested by Mr. Bill Olson of the NMOCD, in a letter dated October 30, 2000, to assist in obtaining closure for the site.

#### BACKGROUND

The leak site is located northwest of the town of Monument, in NW ¼, SE ¼ of Section 31, Township 19 South, Range 37 East, in Lea County, New Mexico, as depicted in Figure 1, Site Location Map. Prior activities at the site included installation of four monitoring wells and quarterly sampling and analysis of the groundwater for constituents of concern (COC). As per NMOCD requirements, on completion of four consecutive groundwater-sampling events with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards, a letter was submitted for closure.

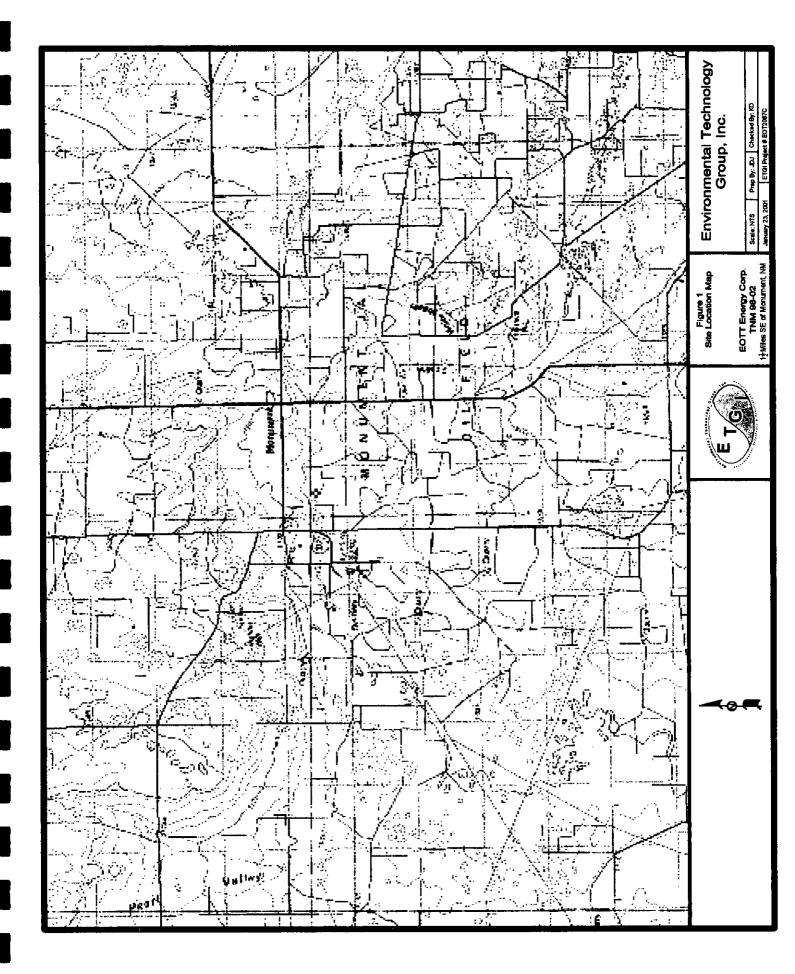
The NMOCD response, dated October 30, 2000, required the installation of a temporary monitoring well adjacent to and down gradient of the release point to perform a one time sampling event of the groundwater as well as the additional information supplied in the report.

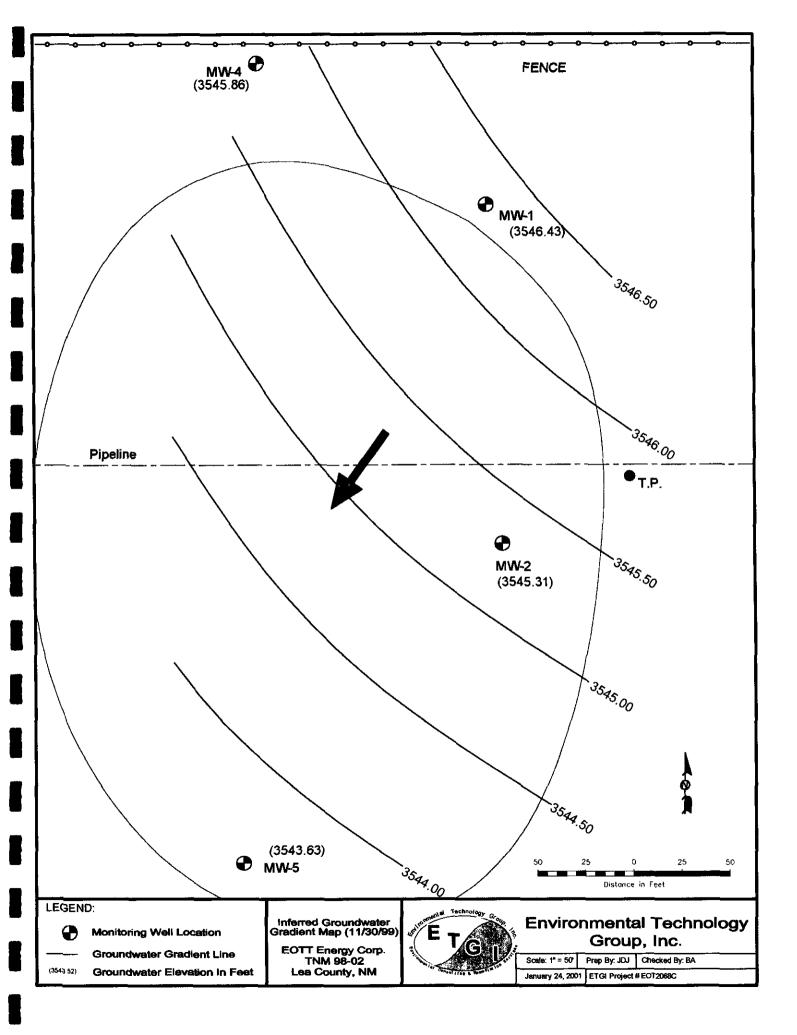
#### ADDITIONAL INFORMATION

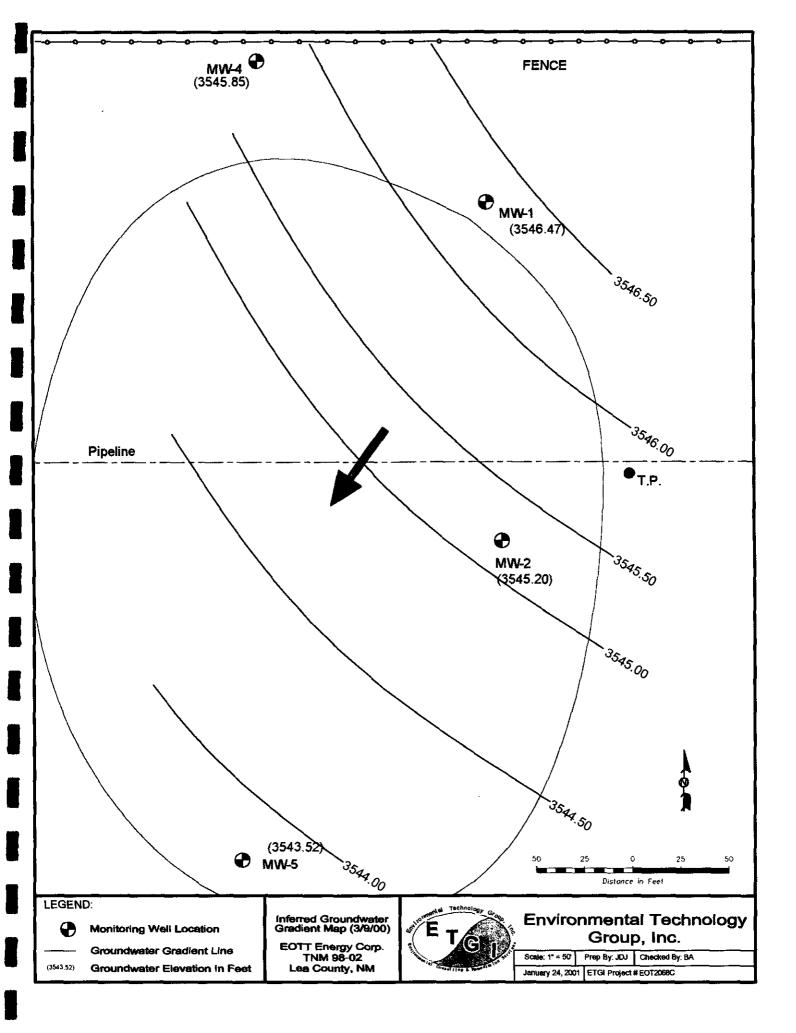
Attached are the Groundwater Gradient Maps for each of the four sampling events in the Figures section, as requested in the response letter. The summation of the groundwater elevations for the sampling events is found in Table 2, Groundwater Elevation Table.

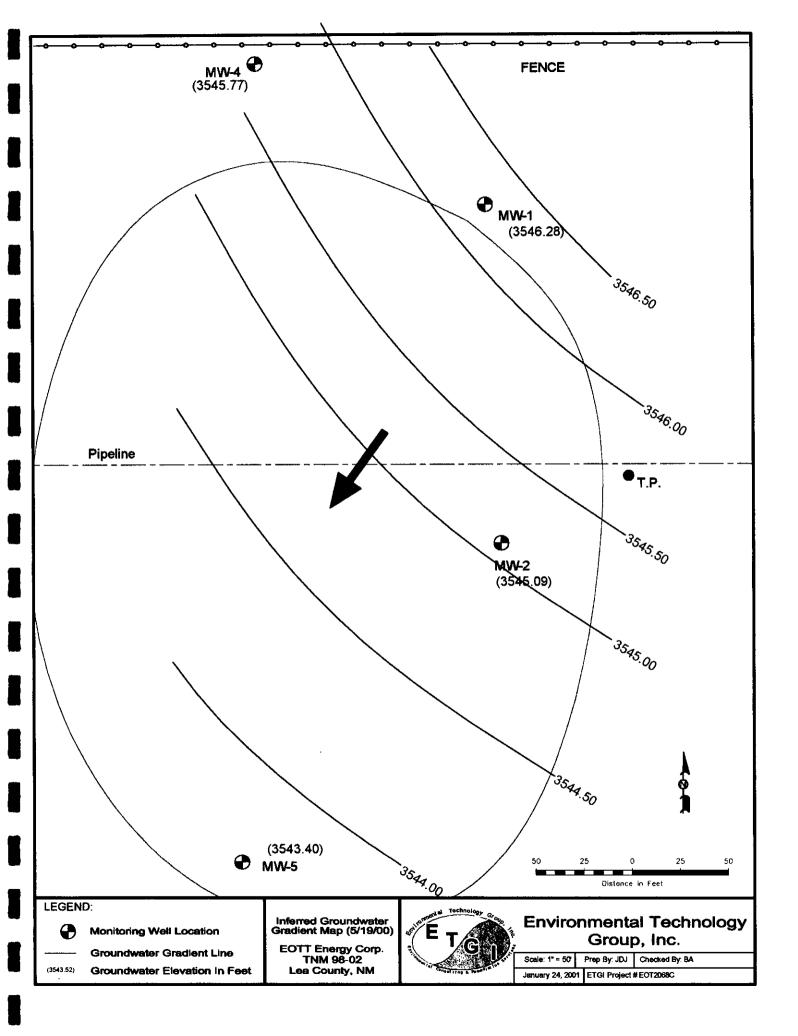
Table 1 depicts the analytical results for the groundwater analysis on the four groundwater sampling events. The corresponding laboratory analytical and associated quality assurance/quality control data are found as an Appendix.

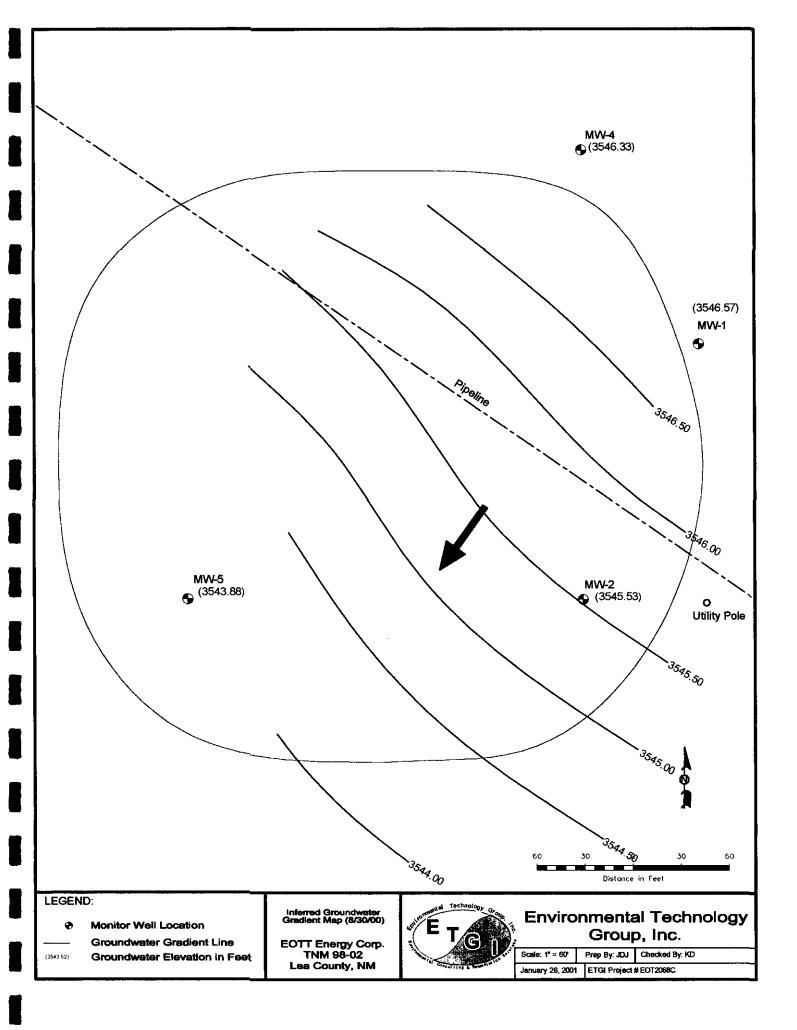
#### FIGURES











#### **TABLES**

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		PRO	TNM 98-02 ATER ELEVAT JECT # EOT2( 1/30/99 - 8/30/0	)68C		
Well Number	Date	Casing Well Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwate Elevation
MW - 1	11/30/99	3,575.77	-	29.34	0.00	3,546.43
MW - 1	3/9/00	3,575.77	-	29.30	0.00	3,546.47
MW - 1	5/19/00	3,575.77	-	29.49	0.00	3,546.28
MW - 1	8/30/00	3,575.77	-	29.20	0.00	3,546.57
MW - 2	11/30/99	3,575.48	-	30.17	0.00	3,545.31
MW - 2	3/9/00	3,575.48	_	30.28	0.00	3,545.20
MW - 2	5/19/00	3,575.48	-	30.39	0.00	3,545.09
MW - 2	8/30/00	3,575.48	-	29.95	0.00	3,545.53
MW - 4	11/30/99	3,576.88	-	31.02	0.00	3,545.86
MW - 4	3/9/00	3,576.88	-	31.03	0.00	3,545.85
MW - 4	5/19/00	3,576.88	-	31.11	0.00	3,545.77
MW - 4	8/30/00	3,576.88	<u> </u>	30.55	0.00	3,546.33
MW - 5	11/30/99	3,574.77	-	31.14	0.00	3,543.63
MW - 5	3/9/00	3,574.77	-	31.25	0.00	3,543.52
MW - 5	5/19/00	3,574.77	-	31.37	0.00	3,543.40
MW - 5	8/30/00	3,574.77	-	30.89	0.00	3,543.88

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#### APPENDICES

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ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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

Sample Type: Water Sample Condition: Intact/ Iced/HCI Project #: TNM 98-02 Project Name: EOT 1015C Project Location: Monument, N.M. Sampling Date: 11/30/99 Receiving Date: 12/02/99 Analysis Date: 12/2 & 12/3/99

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m.p-XYLENE (mg/L)	o-XYLENE (mg/L)
21940	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
21941	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
21942	MW-4	<0.001	<0.001	<0.001	<0.001	<0.001
21943	MW-5	0.003	0.002	<0.001	0.001	<0.001
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% IA	101	96	97	97	95
% EA	96	95	96	97	96
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B,5030

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**Paland K. Tuttle** 

Environmental L Project Manager: Teoper See Taylor Company Name & Address: ETC2 Company Name & Address: ETC2 Projectal: NAHE Frojectal: NAHE	Environmental Lab of Texas, Inc. 12600 West 1-20 East Odessa, Texas 79763 915) 563-1713 915) 563-1800 FAX (915) 563-1713 0000 Manger 565 (マン) 61 - 97/66 FAX N. (5-05) 392 - 3766 mpuy Name & Address: E762 mpuy Name & Address: E762 mpuy Name & Address: E762 mpuy Name & Address: E762 Mand 77 (979) 290-032 Mand 78 - 02 Mand 78 - 02 Mand 70 (200 (200 (200 (200 (200 (200 (200 (	IS, Inc. 12600 Wes (915) Phone #: FAX #: ( FAX #: ( FAX #: ( For the Project	600 West 1-20 East Ode (915) 563-1800 FA) Phome #: (タィン) 164 FAX #: (ターム) 392 FAX #: (ターム) 392 Fayloct # # # Project # # #	Odessa, Texas FAX (915) 563 164 - 9/66 164 - 3766	Odessa, Texas 79763 FAX (915) 563-1713 61 4 - 9166 92 - 3766		Cr Pb Hg Sa	Сг Ръ На Se	DDV RE	TODY RECORD AND	CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST O Y C Ct Pb Hg Se Ct Pb Hg Se	SIS ATVA	KEQUE	5	
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Belinquished Mr.	2 Date 2-99	Tline: 1320	Received by	Received by Laboratory:		1260120	No.	ENWAN TROST	14	150	11	510	k		

## ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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

**ETHYLBENZENE** 

SampleType: Water Sample Condition: Intact/ Iced/HCl Project #: EOT 1015C Project Name: TNM 98-02 Project Location: Monument, N.M. Sampling Date: 03/09/00 Receiving Date: 03/10/00 Analysis Date: 3/14-3/15/00

m.p-XYLENE o-XYLENE

ELT#	FIELD CODE	mg/L	mg/L	mg/L	mg/L	<u> </u>	
24120	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001	· · ·
24121	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001	
24122	MW-4	<0.001	<0.001	<0.001	<0.001	<0.001	
24123	MW-5	0.006	<0.001		0.002		
24120	WITT-J	0.000	<b>NO.001</b>	0.001	0.002	<0.001	-
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				s'			
%		103	94	94	102	90	
	EA	95	85	83	92	82	
BL	ANK	<0.001	<0.001	<0.001	<0.001	<0.001	

TOLUENE

METHODS: SW 846-8021B,5030

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## ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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

SampleType: Water Sample Condition: Intact/ Iced/HCI/ 56 deg. F Project #: EOT 2015C Project Name: TNM 98-02 Project Location: Monument, N.M. Sampling Date: 05/19/00 Receiving Date: 05/22/00 Analysis Date: 05/27 & 05/28/00

ELT#	FIELD CODE	BENZENE mg/L		ETHYLBENZENE mg/L	m,p-XYLENE ng/L	o-XYLENE mg/L	
25947	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	
25948	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	
25949	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001	
25950	MW 5	0.006	<0.001	<0.001	<0.001	<0.001	

% IA	97	94	95	102	94
% EA	94	91	93	98	91
BLANK	<0.001	<0.001	<0.001	< 0.001	<0.001

METHODS: SW 846-8021B.5030

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5-30-00 Date

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XAS, Inc. 12600 West I-20 East Odessa, Teras 79763 (915) 563-1800 FAX (915) 563-1713	Frome #: (5 25) 232 - 873 / EXX#: (5 25) 392 - 3760	- 14 1.D. AND 74 2520 4	Project Name: T/NM9 98-02	Sampler Signalpre:	E MATRIX PRESERVATIVE METHOD	СОИТА!ИЕ СОИТА!ИЕ СОИТА!ИЕ СОИТА!ИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ СОИЕ С	VX					Trans: Bendret H.	1/12/ Recipied by	Times: Received by Laboratory.
Environmental Lab of Texas, In	more have JESSE , Miles	Company New & Address: C. T. C. T.	Mark: 207 2050	Froject Location: Mariantonis al not		FIELD CODE	25947 MUL/	•				Kellingutshiller Relingutshiller Reline Conte S- 19-6	H	Rellaquibled by: Date

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ENVIRONMENTAL LAB OF S , Inc.

"Don't Treat Your Soil Like Dirt!"

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

SampleType: Water Sample Condition: Intact/ Iced/ HCi/ 30 deg. F Project #: EOT 2068C Project Name: TNM 98-02 Project Location: Monument, N.M.

Sampling Date: 08/30/00 Receiving Date: 09/01/00 Analysis Date: 09/05/00

ELTH	FIELD CODE	BENZENE	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTEX mg/L	-
30311	. MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	•

% IA	103	100	103	106	99
% EA	104	104	106	110	102
BLANK	<0.001	∖,<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030

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9-12-CO Date

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

ENVIRONMENTAL LAB OF ) , Inc.

"Don't Treat Your Soil Like Dirt!"

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

SampleType: Water Sample Condition: Intact/ Iced/ HCI/ 30 deg. F Project #: EOT 2068C Project Name: TNM 98-02 Project Location: Monument, N.M.

Sampling Date: 08/30/00 Receiving Date: 09/01/00 Analysis Date: 09/06/00

ELT#		BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE	m.p-XYLENE mg/L	o-XYLENE mg/L	BTEX	-
30312	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	.;
30313	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
30314	MW 5	0.002	<0.001	<0.001	<0.001	<0.001	0.002	
30315	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

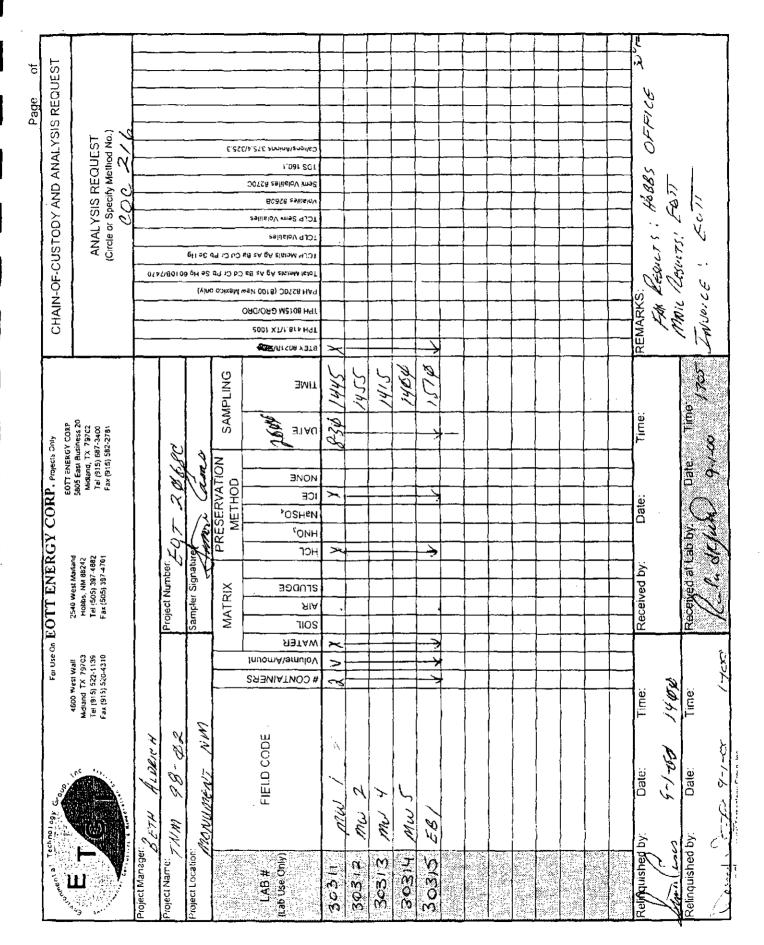
METHODS: SW 846-8021B,5030

Calon ak Jourli Raland K. Tuttle

9-12-00 Date

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

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January 29, 2001

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION



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

RE: EOTT TNM 98-02 Leak Site, NW 1/4, SE 1/4, Sec 31, T19S, R37E, Lea County, NM

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following information in response to your letter, dated October 30, 2000, pertaining to our request for closure at the above referenced site. Our responses to your additional items requested are as follows:

- 1.) A Work Plan for the installation of an additional monitoring well is supplied under separate cover. The temporary monitoring well will be installed adjacent to and down gradient of, the release point.
- 2.) Please find attached in the Figures Section, a groundwater Gradient Map for the four sampling events identified in the previous correspondence. Also attached are Table 1, a summary of the analytical testing from December 1999 through August 2000 and Table 2, a summary of groundwater elevations for the sampling events. The corresponding laboratory analytical and associated quality assurance/quality control data are found as an Appendix. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period.

An additional request 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 will be submitted on completion of the Work Plan. 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. aldered

Beth Aldrich Sr. Project Manager/ Geologist

May 3, 2001

Mr. Bill Olson New Mexico Oil Conservation Division Environmental Bureau 1220 South Francis Santa Fe, NM 87505

MAY - 8 200



RE: EOTT TNM 98-02 Leak Site, NW 1/4, SE 1/4, Sec. 31, T19S, R37E, Lea County, NM

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the enclosed Remediation Work Plan Supplement (RWPS). The RWPS is in response to your letter, dated October 30, 2000, addressing our request for closure at the above referenced site. The RWPS contains the following:

- Figure 1- Site Location Map of the immediate area
- Figure 2- A groundwater Gradient Map showing the existing monitoring wells and the proposed location of the temporary monitoring well
- Table One- A summary of the analytical testing from December 1999 through August 2000
- Table Two- A summary of groundwater elevations for the sampling events
- Appendix A- Laboratory analytical results and associated quality assurance/quality control data indicating that no constituent of concern has been above the limits set by the New Mexico Water Quality Control Commission during the sampling period

Upon implementation of the enclosed RWPS, an additional request for closure of this site will be submitted.

If further questions or concerns arise, please call me at (505) 397-4882.

Sincerely,

Ken Duut

Sr. Project Manager

Enclosure cc: Chris Williams - NMOCD District I Wayne Brunette -EOTT- Midland, TX Mike Kelly - EOTT - Houston ETGI – Midland, TX ETGI – Hobbs, NM February 20, 2001

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



RE: EOTT TNM 98-02 Leak Site, NW ¼, SE ¼, Sec 31, T19S, R37E, Lea County, NM

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following information in response to your letter, dated October 30, 2000, pertaining to our request for closure at the above referenced site. Our responses to your additional items requested are as follows:

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

Sincerely,

Beth Aldrich Sr. Project Manager/ Geologist



### NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary Lori Wrotenbery Director Oil Conservation Division

February 8, 2001

#### <u>CERTIFIED MAIL</u> RETURN RECEIPT NO: 5051-4119

Mr. Glenn Waldrop EOTT Energy Corporation P.O. Box 1660 Midland, Texas 79702

#### RE: CASE # 1R0098 TNM-98-02 LEAK SITE LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corporation's (EOTT) January 19, 2001 "REMEDIATION WORK PLAN, EOTT ENERGY CORP, TNM 98-02, LEA COUNTY, NEW MEXICO" which was submitted on February 5, 2001 on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains EOTT's work plan for installation of an additional ground water monitoring well at EOTT's TNM 98-02 leak site located in the NW/4 SE/4 of Section 31, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico.

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

- 1. EOTT shall complete the new monitor wells 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.

- 2. All soil and ground water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC).
- 3. All wastes generated during the investigation shall be disposed of at an OCD approved facility.

Please be advised that OCD approval does not relieve EOTT of responsibility should the investigation actions fail to adequately define the extent of contamination related to EOTT's pipeline, 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) 476-3491.

Sincerely,

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William C. Olson Hydrologist Environmental Bureau

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



**FAX COVER SHEET** 

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FROM Beth Aldrich TO MOC ENVIRONMENTAL TECHNOLOGY GROUP FAX NUMBER 505 476 3462 FAX NUMBER 915/520-4310 505.39 NUMBER OF PAGES (INCLUDING COVER) 19  $\left( \lambda \right)$ NOTES: Ions (a 505 197.4882 238 17910 M

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#### **REMEDIATION WORK PLAN**

EOTT ENERGY CORP. TNM 98-02 LEA COUNTY, NEW MEXICO

> Prepared For: EOTT Energy Corp. 5805 East Highway 80 Midland, Texas 79701

Environmental Technology Group, Inc. Project No. EOT2068C

Prepared By Environmental Technology Group, Inc. (ETGI) 2540 West Marland Blvd. Hobbs, New Mexico 88240

January 19, 2001

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#### WORK PLAN SUPPLEMENT FOR SITE CLOSURE TNM 98-02 Lea County, New Mexico January 19, 2001 Prepared By: ETGI

#### INTRODUCTION

Environmental Technology Group, Inc. (ETGI) hereby submits a Work Plan to the New Mexico Oil Conservation Division on behalf of EOTT Energy Corp. (EOTT) for the installation of an additional temporary groundwater monitoring well at the TNM 98-02 leak site. This plan will serve as a "Work Plan Supplement" as referenced in the "General Work Plan for Remediation of EOTT Pipeline Spills, Leaks, and Releases in New Mexico" approved by New Mexico Oil Conservation Division (NMOCD) on August 1, 2000. The regulatory basis for both the General Work Plan and this Work Plan Supplement is the August 1993 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.

#### 

#### BACKGROUND

The leak site is located northwest of the town of Monument, in NW ¼, SE ¼ of Section 31, Township 19 South, Range 37 East, in Lea County, New Mexico as depicted in Figure 1, Site Location Map. Prior activities at the site included installation of five monitoring wells, subsequent excavation of impacted soils and quarterly sampling and analysis of the groundwater of four of these monitoring wells, MW-1, MW-2, MW-4 and MW-5, for constituents of concern (COC). The soils surrounding monitoring well MW-3 as well as MW-3 were excavated to remove in-situ contamination. As per NMOCD requirements, on completion of four consecutive groundwater-sampling events with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards, a letter was submitted for closure.

The NMOCD response, dated October 30, 2000, required the installation of a temporary monitoring well adjacent to and down gradient of the release point to perform a one time sampling event of the groundwater. If the sample obtained is below the standards set forth in NMOCD Rule 19.B, then the NMOCD will issue closure approval for the site.

#### PURPOSE OF INVESTIGATION

As required by the NMOCD, in a letter dated October 30, 2000, further investigation of the groundwater at the site is necessary. An additional temporary monitoring well is to be installed in accordance with NMOCD guideline adjacent to and down gradient of the release point at the site. Once installation of the monitoring well is complete, a one-time sampling event will be performed on the groundwater.

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#### METHODOLOGY

ETGI plans to supervise and coordinate the drilling of the temporary groundwater monitoring well at the site. The monitoring well will be installed adjacent to, and down gradient of, the release point. The proposed location is depicted on Figure 2, Site Map. During the monitoring well installation soil samples will be collected every five feet with a split spoon sampler except in those locations containing indurated materials. Each five-

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foot sample will be field screened with a photo ionization detector (PID) and a continuous lithologic log of the penetrated section will be maintained and recorded. All of the soil samples, including a surface sample, will be transported under Chain of Custody to Environmental Laboratory of Texas (ELOT) for analysis.

The monitoring wells will be completed and developed in accordance with NMOCD Guideline Parts V.C.1 and V.C.3, respectively. The fluid levels will be measured within 1/100th of a foot then purged and sampled in accordance with the NMOCD Guideline Part V.C.4. As required by NMOCD Rule 19.8, the groundwater sample will be submitted for analyses identified below.

#### ANALYSES

All soil samples submitted for analysis will be analyzed for TPH using EPA Method 8015 Modified GRO/DRO Extended Range. Samples with a field PID reading in excess of 100ppm may be submitted for Benzene, Toluene, Ethyl benzene and Xylenes (BTEX) analysis using EPA Method 8021B.

The groundwater sample will be submitted for the following analysis:

- BTEX (EPA Method 8021B and 5030)
- TPH EPA Method 8015 Modified GRO/DRO Extended Range
- Major Cations and Anions EPA Methods 375.4, 3251.3 and 310
- Total Dissolved Solids (TDS) EPA Method 160.1
- Polynuclear Aromatic Hydrocarbons (PAH) EPA Method 8270C, 3510
- Metals EPA Method 6010B, 7470

#### **DISCUSSION OF FINDINGS**

Four consecutive sampling events of the groundwater from the four monitoring wells that were conducted prior to this Work Plan indicated no analytical results above the NMWQCC standards. These results are shown in Table 1.

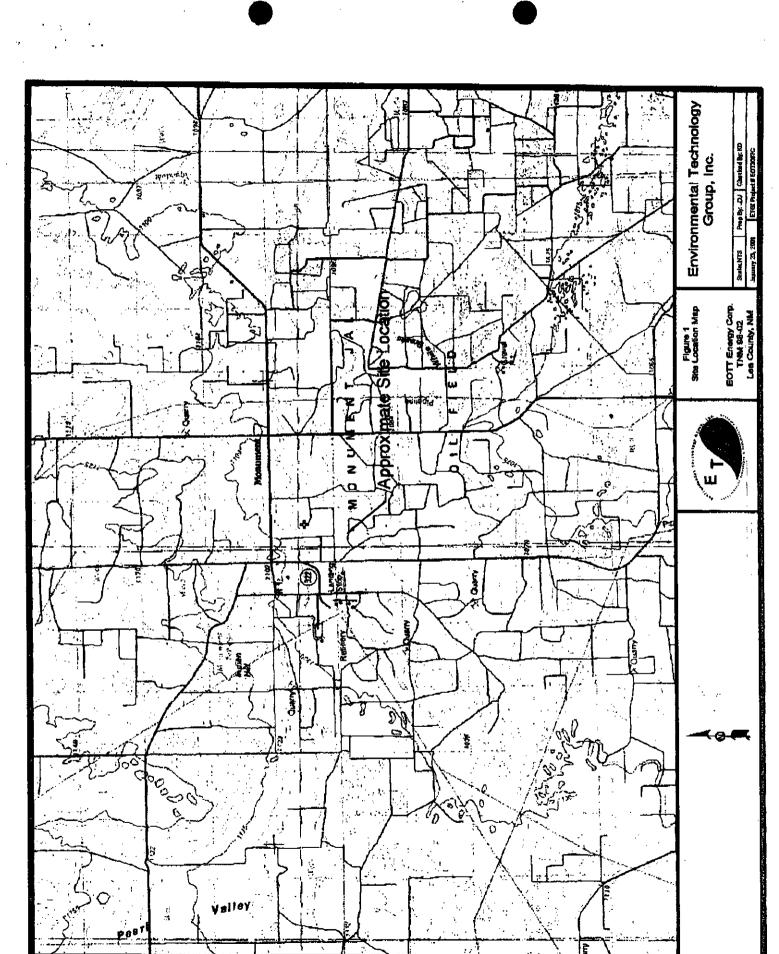
#### CONCLUSIONS

Groundwater contamination appears not to have migrated down gradient of the release point based on prior analytical testing at the previously installed monitoring wells. Further investigation and sampling of the groundwater adjacent to, and down gradient of, the release point is needed to delineate any hydrocarbon impact and to secure site closure as per NMOCD requirements.

#### FOLLOW-UP ACTIVITIES

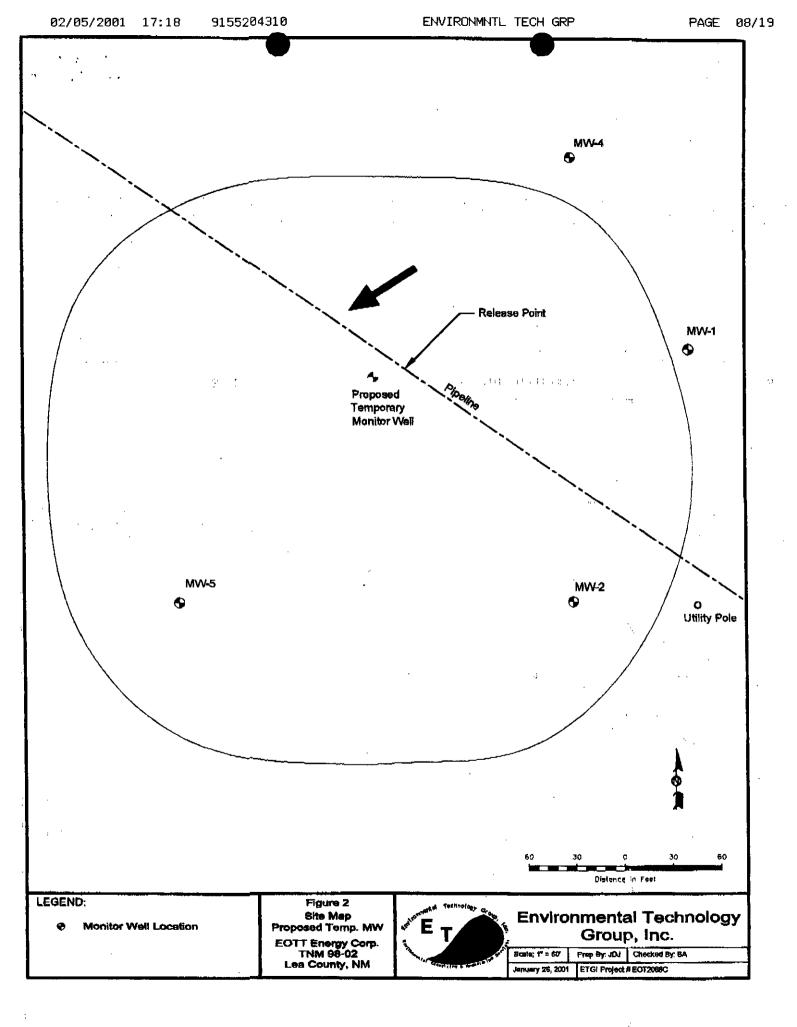
Installation of a temporary monitoring well, adjacent to, and down gradient of the release point, can be initiated within two weeks of the work plan approval. Once installed, purging and sampling of the groundwater will be conducted. The groundwater sample will be transported under Chain of Custody to ELOT for analysis. On notification of the results of the analysis, the site will be resubmitted for closure if the analysis indicates no COC above the NMQWCC standards. If the analysis indicates COC above the NMWQCC standards, further investigation will be addressed under separate cover.

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#### Table 1

#### CONCENTRATIONS OF BTEX IN GROUNDWATER

#### EOTT ENERGY PIPELINE LIMITED PARTNERSHIP TNM 98-02 MONUMENT(LEA COUNTY), NEW MEXICO ETGI Project # EOT 2068C

All concentrations are in mg/L

SAMOLE	SAMPLE LOCATION	SW 846-80218, 5030					
SAMPLE DATE		BENZENE	TOLUENE	ETHYL- BENZENE	M,P- Xylenes	0- XYLENES	
11/30/89	MW-1	<0.001	<0.001	< 0.001	< 0.001	<0.001	
3/9/00	MW-1	< 0.001	<0.001	< 0.001	<0.001	<0.001	
5/19/00	MW-1	<0.001	<0.001	<0.001	< 0.001	<0.001	
8/30/00	MW-1	<0.001	<0.001	< 0.001	<0.001	<0.001	
11/30/99	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001	
3/9/00	MW-2	< 0.001	<0.001	< 0.001	<0.001	<0.001	
5/19/00	MW-2	<0,001	<0.001	< 0.001	<0.001	<0,001	
8/30/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001	
11/30/99	MW-4	< 0.001	<0.001	<0,001	<0.001	<0.001	
3/9/00	MW-4	<0.001	<0.001	<0.001	<0.001	<0.001	
5/19/00	MW-4	<0.001	<0.001	<0.001	<0,001	<0.001	
8/30/00	MVV-4	<0.001	<0.001	<0.001	<0.001	<0.001	
11/30/99	MW-5	0,003	0.002	<0.001	0.001	< 0.001	
3/9/00	MW-5	0.006	<0.001	0,001	0.002	<0.001	
5/19/00	MW-5	0.008	<0.001	<0.001	<0,001	<0.001	
8/30/00	MW-5	0.002	<0,001	<0,001	<0.001	<0.001	
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Environmental LAB O , INC.

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

SampleType: Water Sample Condition: Intact/Iced/HCi/30 deg. F Project #: EOT 2068C Project Name: TNM 98-02 Project Location: Monument, N.M.

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#### Sampling Date: 08/30/00 Receiving Date: 09/01/00 Analysis Date: 09/05/00

	FIELD CODE	BENZENE	TOLUENE	ETHYLBENZENE	m,p-XYLENE	o-XYLENE	TOTAL BTEX mg/L
30311	<sup>1</sup> MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
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% IA	103	100	103	106	99
% EA	104	104	106	110	102
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#### METHODS: SW 846-80218,5030

C\1. Raland K. Tuttle

9-12-00 Date

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

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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 2068C Project Name: TNM 98-02 Project Location; Monument, N.M. Sampling Date: 08/30/00 Receiving Date: 09/01/00 Analysis Date: 09/06/00

ELT#		BENZENE	TOLUENE	ETHYLBENZENE	m,p-XYLENE	o-XYLENE mg/L	TOTAL BTEX mg/L	
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30312	MW2	<0.001	<0.001	<0.001	<0.001	<0.001	<0,001	, 'n
30313	MW 4	<0.001	<0,001	<0.001	<0.001	<0.001	<0.001	
30314	MW 5	0,002	<0.001	<0,001	<0.001	<0.001	0,002	
30315	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	
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% EA	95	94	95	95	91
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METHODS: SW 846-80218,5030

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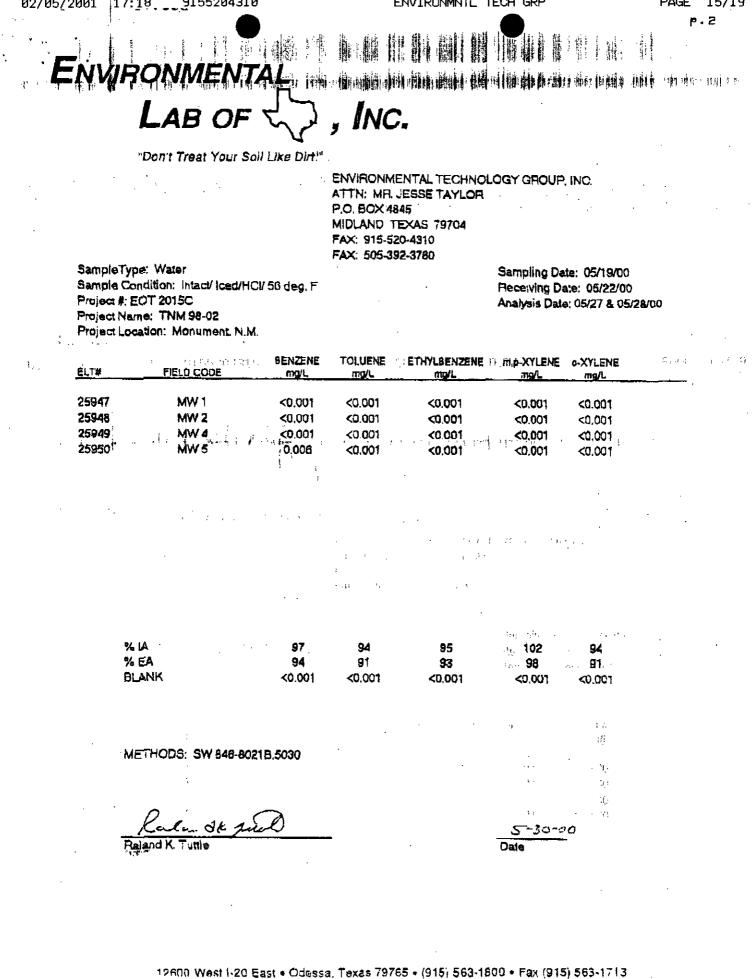
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ENVIRONMENTAL TECHNOLOGY GROUP, INC. ATTN: MR. JESSE TAYLOR P.O. BOX 4845 MIDLAND, TEXAS 79704 FAX: 915-520-4310 FAX: 505-392-3760

ETHYLBENZENE

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SampleType: Water Sample Condition: Intact/ Iced/HCl Project #: EOT 1015C Project Name: TNM 98-02 Project Location: Monument, N.M.

FIELD CODE

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Sampling Date: 03/09/00 Receiving Date: 03/10/00 Analysis Date: 3/14-3/15/00

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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary Lori Wrotenbery Director Oil Conservation Division

October 30, 2000

## **CERTIFIED MAIL RETURN RECEIPT NO: 5051-3730**

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

## RE: TNM-98-02 LEAK SITE LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) September 21, 2000 correspondence titled "EOTT TNM 98-02 LEAK SITE" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains a summary of ground water analytical sampling results from the site monitor wells and requests closure of the remediation and monitoring actions.

The remediation actions conducted to date appear satisfactory. However, the OCD has the following comments and requests for information regarding the above referenced document:

- A review of the records on this site shows that there are no results of ground water sampling directly adjacent to the source of contamination. The OCD requires that EOTT submit a plan to install a ground water monitoring well directly adjacent to and downgradient of the excavated area. If a one time sample from this area is below the standards of OCD Rule 19.B., then the OCD will issue closure approval for the site. Please submit the work plan to the OCD Santa Fe Office by November 30, 2000 with a copy provided to the OCD Hobbs District Office.
- 2. The document does not contain the laboratory analytical results and associated quality assurance/quality control data for the referenced ground water samples, nor a ground water gradient map for each sampling event. Please provide this information.

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 Aldrich, Environmental Technology Group, Inc. September 21, 2000

Strong & Remediation Service

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

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ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

RE: EOTT TNM 98-02 Leak Site

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following request for site closure at the EOTT TNM 98-02 Leak Site in NE ¼, SE ¼, Section 31, Township 19 South, Range 37 East, in Lea County, New Mexico. As per your requirements, we have completed four consecutive quarters of ground water sampling for the five monitoring wells at the site, with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored contaminates of concern (COC).

Please find attached Table 1, a summary of the analytical testing from November 1999 through August 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,

Set aldrice

Beth Aldrich Geologist/New Mexico Area Manager

Cc: Glenn Waldrop, EOTT Energy Corp. Jerry Nickel, ETGI - Midland

#### Table 1

### CONCENTRATIONS OF BTEX IN GROUNDWATER

### EOTT ENERGY PIPELINE LIMITED PARTNERSHIP TNM 98-02 MONUMENT(LEA COUNTY), NEW MEXICO ETGI Project # EOT 2068C

SW 846-8021B, 5030 SAMPLE SAMPLE LOCATION M,P-ETHYL-0-DATE BENZENE TOLUENE BENZENE XYLENES XYLENES 11/30/99 MW-1 <0.001 <0.001 <0.001 <0.001 <0.001 < 0.001 3/9/00 MW-1 <0.001 < 0.001 < 0.001 < 0.001 5/19/00 MW-1 <0.001 < 0.001 <0.001 < 0.001 <0.001 8/30/00 MW-1 < 0.001 < 0.001 < 0.001 < 0.001 < 0.001 < 0.001 < 0.001 11/30/99 MW-2 < 0.001 < 0.001 < 0.001 3/9/00 MW-2 < 0.001 < 0.001 < 0.001 < 0.001 < 0.001 5/19/00 MW-2 < 0.001 < 0.001 < 0.001 <0.001 < 0.001 8/30/00 MW-2 <0.001 < 0.001 <0.001 < 0.001 <0.001 <0.001 <0.001 < 0.001 11/30/99 MW-4 <0.001 < 0.001 3/9/00 MW-4 < 0.001 < 0.001 <0.001 < 0.001 <0.001 5/19/00 MW-4 < 0.001 < 0.001 <0.001 <0.001 < 0.001 8/30/00 MW-4 <0.001 < 0.001 <0.001 < 0.001 < 0.001 11/30/99 MW-5 0.003 0.002 <0.001 0.001 < 0.001 3/9/00 MW-5 < 0.001 0.001 0.002 < 0.001 0.006 5/19/00 MW-5 0.006 < 0.001 < 0.001 < 0.001 < 0.001 8/30/00 MW-5 <0.001 <0.001 <0.001 < 0.001 0.002

All concentrations are in mg/L

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660 5805 E. BUSINESS 20 MIDLAND, TEXAS 79702 (915) 682-3761

FEDERAL EXPRESS AIR BILL # 8170 0342 3660

March 30, 2000

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

## RE: ANNUAL GROUND WATER MONITORING REPORTS

Dear Mr. Olson:

Attached please find the 2000 Annual Groundwater Monitoring Reports for the following sites:

Monument #18	Monument #10
Monument #17	TNM-97-16 (Becky Jo Doom site)
Monument #2	HDO-90-23
Monument #15	SPS-11
TNM-97-17	<b>(TNM-98-02</b> )
TNM-97-18	TNM-98-S01
TNM-98-05A	TNM-97-23
TNM-96-16	TNM-95-10 (Saunders)
TNM-97-14	TNM-97-04 (Townsend)

I hope all meets with OCD requirements for closure of the site but if you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,

Lennah Frost Sr. Environmental Engineer

cc: Environmental File



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

October 29, 1998

Mr. Tony Savoie TEXAS - NEW MEXICO PIPE LINE COMPANY P.O. Box 1030 Jal, New Mexico 88252 RECEIVED

NOV 0 9 1998

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Re: Monitoring Wells MW-1 through MW-5 Soil Borings SB-1 through SB-10 TNM-98-02 Unit J, Section 31, Township 19 South, Range 37 East Lea County, New Mexico Job No. 810044-1

Dear Mr. Savoie:

Transmitted with this letter is the final Subsurface Investigation Report for the installation of monitoring wells MW-1 through MW-5 and soil borings SB-1 through SB-10 at TNM-98-02 in Lea County, New Mexico.

Please contact me at (210) 680-3767 with your comments or suggested changes.

Respectfully,

Theresa Nex

Theresa Nix Project Manager

Enclosure

cc: Marc Oler, Equilon William Olson, OCD Santa Fe OCD Hobbs Office

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

August 3, 1998

Mr. Roger Anderson STATE OF NEW MEXICO Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Texas-New Mexico Pipe Line Company TNM-98-02 Section 31, Township 19 South, Range 37 East Lea County, New Mexico Job No. 810044-1

Dear Mr. Anderson:

This letter provides written notification of hydrocarbon impact to ground water at the above referenced site during monitoring well installation activities.

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On August 2, 1998, apparent phase-separate hydrocarbons (PSH) was observed in a 2" diameter monitoring well (designated MW-3) located on the above referenced site, following installation of that well. The apparent PSH was observed in a sand layer approximately 29 feet below ground surface during drilling. Mr. Tony Savoie of Texas - New Mexico Pipe Line Company (TNMPL) notified you of this discovery on August 3, 1998, at 8:30 a.m., by telephone.

If you have any questions please contact Mr. Savoie at (505) 395-2705 or call me at (210) 680-3767.

Respectfully,

Dugt Stan for

Theresa Nix Project Manager

cc: TNMPL, Tony Savoie OCD Hobbs District Office, Wayne Price

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