

Bratcher, Mike, EMNRD

From: Bob Allen [ballen@sesi-nm.com]
Sent: Wednesday, April 11, 2012 3:35 PM
To: Bratcher, Mike, EMNRD
Cc: Green, Bill; nora.vazquez@hollyenergy.com; lori.coupland@hollyenergy.com; Susana Rodriguez
Subject: St Marys Federal Delineation Workplan
Attachments: St Marys' Delineation Workplan.docx

Mike...

I have attached the Delineation Workplan for the St Marys Federal spill reported by Holly Energy Partners on December 13, 2011 via C-141. Please review the proposal and forward your approval at your earliest convenience. Thank you.

Bob Allen CSP, CHMM
Cell # 575.390.7063
Office # 575.397.0510
Fax # 575.393.4388

Isaiah 40:31

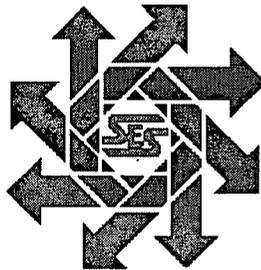
They that wait upon the Lord shall renew their strength; they shall mount up with wings as eagles; they shall run, and not be weary; and they shall walk, and not faint.

Holly Energy Partners

***St. Mary's Federal
Section 28 of Township 19 South, Range 29 East,
Eddy County, New Mexico***

Delineation Workplan

April 5, 2012



Prepared for:

***Holly Energy Partners
P.O. Box 1260
Artesia, New Mexico 88211***

By:

***Safety & Environmental Solutions, Inc.
703 East Clinton Street
Hobbs, New Mexico 88240
(575) 397-0510***

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I. Company Contacts

Representative	Company	Telephone	E-mail
Nora Vazquez	Holly Energy Partners	575-746-5475	Nora.Vazquez@hollyenergy.com
Bill Green	Holly Energy Partners	575-748-8968	bill.green@hollyenergy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

II. Background

Safety and Environmental Solutions, Inc. (SESI) was engaged by Holly Energy Partners (HEP) to perform site assessment of a release area at the St. Mary's Federal located in Section 28 of Township 19 South, Range 29 East, Eddy County, New Mexico.

The New Mexico Oil Conservation Division (OCD) C-141 was filed on December 13, 2011. A contractor working for another company was excavating in the area and hit the 4" steel pipeline with a trackhoe. (HEP did not receive notification of planned excavation per the one-call ticket #2011491401). Clean-up crews were dispatched and free product was removed. Approximately 120 barrels of crude oil was released with approximately 110 barrels recovered.

The site is located on Bureau of Land Management (BLM) land.

III. Surface and Ground Water

The nearest groundwater record listed with the New Mexico Office of State Engineers (NMOSE) is in Section 34 Range 29 East and Township 19 South, which is located 0.82 miles southeast of the site. The depth to groundwater was reported at 60 feet in April 1989.

IV. Characterization

The target cleanup levels are determined using the "Guidelines for Remediation of Leaks, Spills and Releases" (NMOCD, August 13, 1993). Application of the OCD's soil ranking criteria indicates the Recommended Remediation Action Levels (RRALs) are 10 parts per million (ppm) Benzene, 50 ppm combined BTEX constituents, and 1,000 ppm Total Petroleum Hydrocarbons (TPH), as presented in the following determination:

Depth to Ground Water:			
(Vertical distance from contaminants to seasonal high water elevation of groundwater)	Less than 50 feet	20 points	
	50 feet to 99 feet	10 points	X
	>100 feet	0 points	
Wellhead Protection Area:			
(Less than 200 feet from a private domestic water source; or less than 1000 feet from all other water sources)	Yes	20 points	
	No	0 points	X
Distance to Surface Water:			
(Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet	20 points	
	200 feet to 1000 feet	10 points	
	>1000 feet	0 points	X
RANKING SCORE (TOTAL POINTS)			10

V. Work Performed

On April 3, 2012, SESI arrived on location and met with Mr. Oscar Moreno and Mr. Kris Jones, Holly Frontier representatives. Mr. Moreno informed SESI that the contractor had hit a Holly 4" steel line while installing a ditch and there was about 2 ft of oil at the bottom of the excavation (ditch). A vacuum truck was onsite and removed all fluid from inside the cut right of way. Mr. Jones stated that Holly fixed the steel line that was damaged. The impacted area was 3-4 feet in depth and >100 barrels of oil was recovered. Devon excavated the area and placed the contaminated soil on a liner, then backfilled the ditch. The poly line within the ditch is a 6" line.

Mr. Jeff Stubblefield, with Holly Frontier, was contacted regarding the release. Mr. Stubblefield stated that there were no initial photographs taken and no sampling was performed.

SESI observed small area of surface staining to the north and west of the right of way with odor. The site was mapped with a Trimble Geo Explorer and photographed. (See Figure 1 and Appendix A)

VI. Action Plan

Delineation of the site is necessary. SESI proposes to use a backhoe to vertically and horizontally delineate the spill area below the ditch line because the soil will be too hard for the use of a hand auger. Vertical and horizontal extent will be considered delineated when the TPH concentration in the soil is 1,000 ppm or less.

The ditch in which the release occurred was approximately 60 feet in length and 3 to 4 feet in width and depth. Three (3) test trenches will be installed perpendicular to the ditch line at regular intervals. Samples will be retrieved from native soil at the bottom of the ditch at 3 feet intervals in each of the test trenches. Samples will be split for field PID analysis. The PID results will be recorded in the field notebook and used for later correlation with the laboratory results. Lab- sSamples will be properly packaged, labeled, preserved and transported under chain of custody to Cardinal Laboratories in Hobbs, New Mexico for analysis for Benzene, Toluene, Ethylbenzene and total Xylenes (BTEX) and TPH by GRO/DRO methodology (Modified 8015).

A One Call has been initiated for the site and no responses from any companies operating in the area have been received. SESI will contact Devon directly before any excavation is performed. SESI would like to have a representative from Devon onsite during the delineation activities. A record of all correspondence will be kept and included in the report of delineation activities.

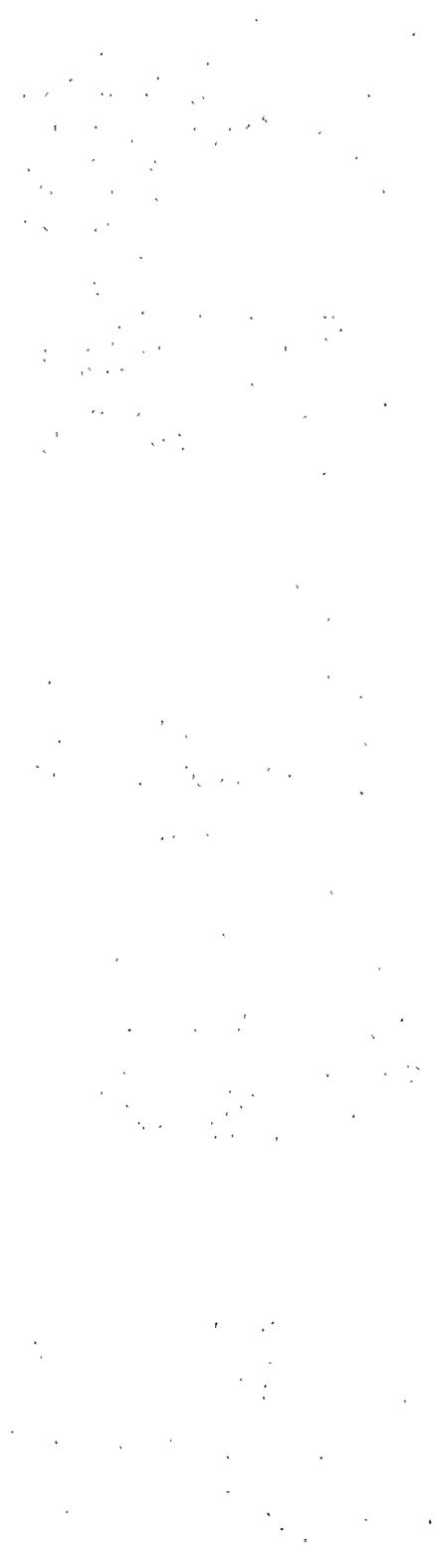
Upon completion of the delineation, the delineation excavations will be backfilled. An estimate of the amount of contaminated soil will be determined and an appropriate work plan will be prepared. The work plan will address onsite remediate technologies that will insure closure under NMOCD and BLM Guidelines.

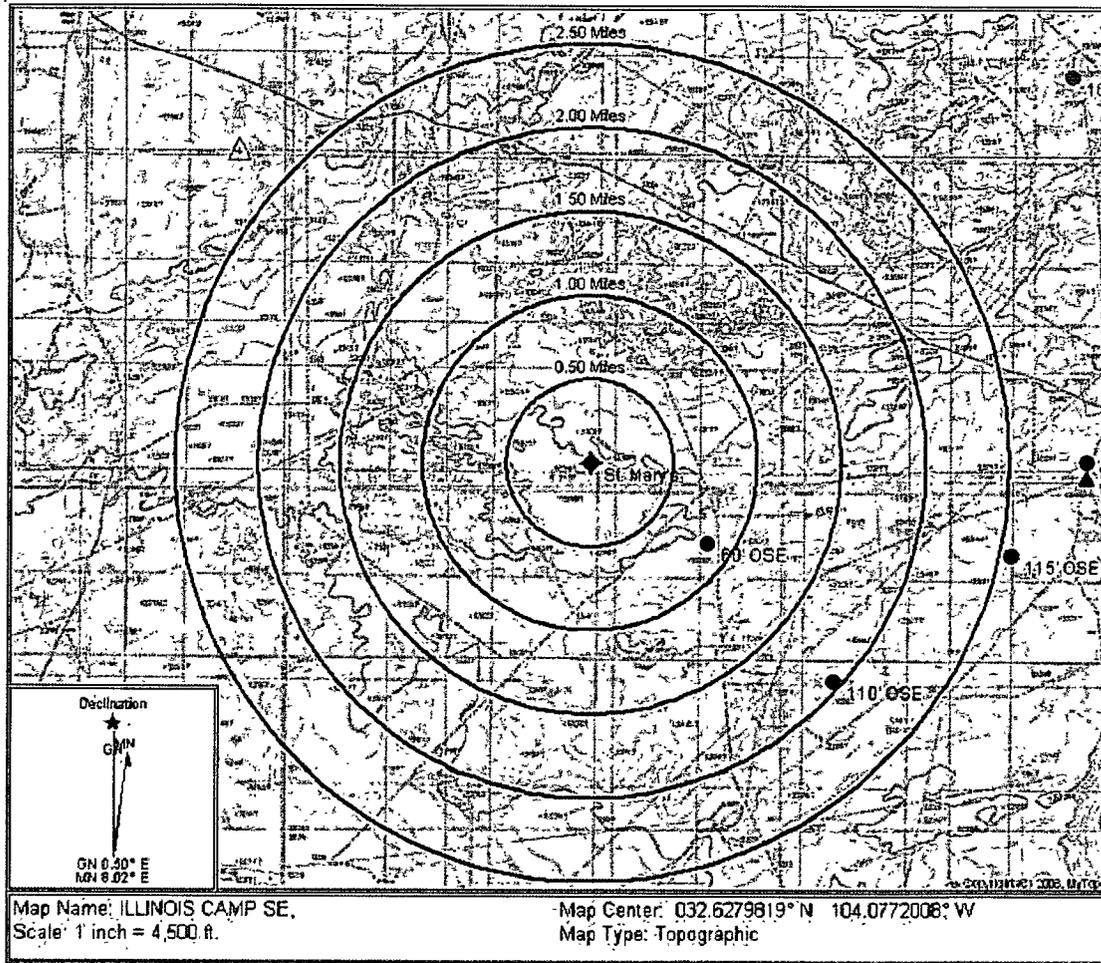
VII. Figures & Appendices

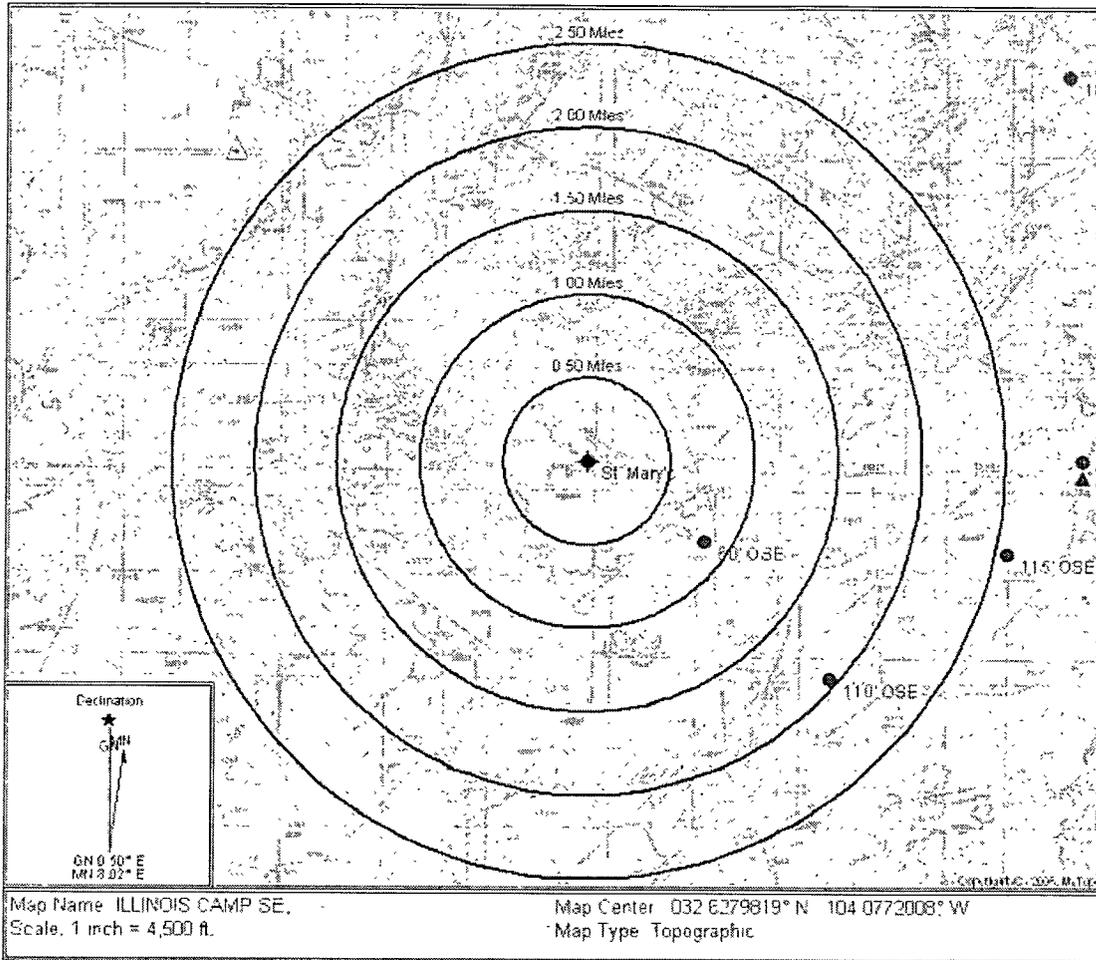
Figure 1 – Vicinity Map
Figure 2 – Site Plan
Appendix A – Site Photographs

Appendix B – C-141

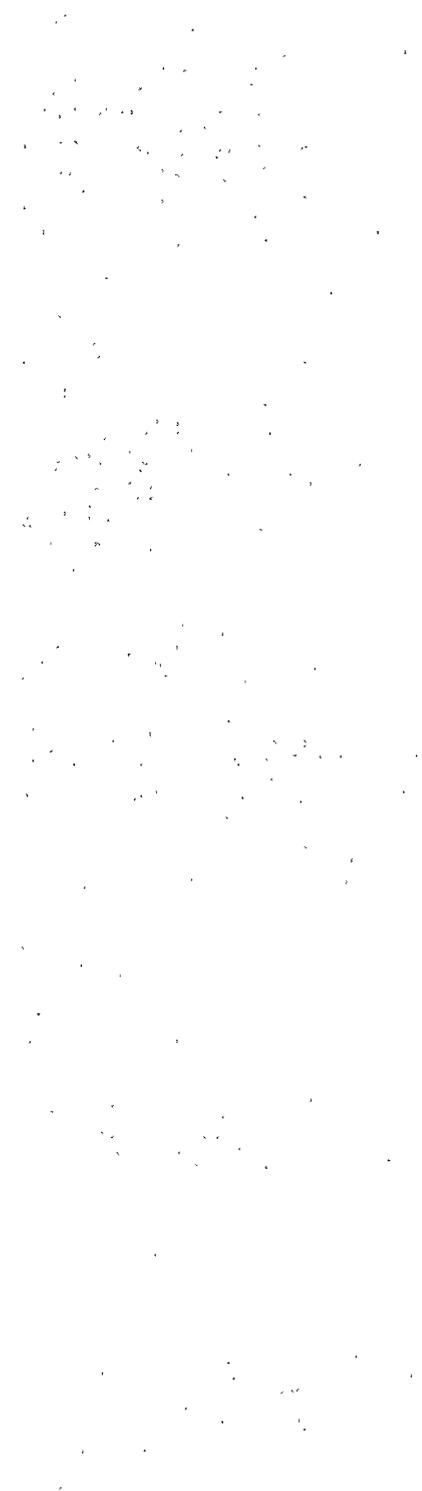
**Figure 1
Vicinity Map**

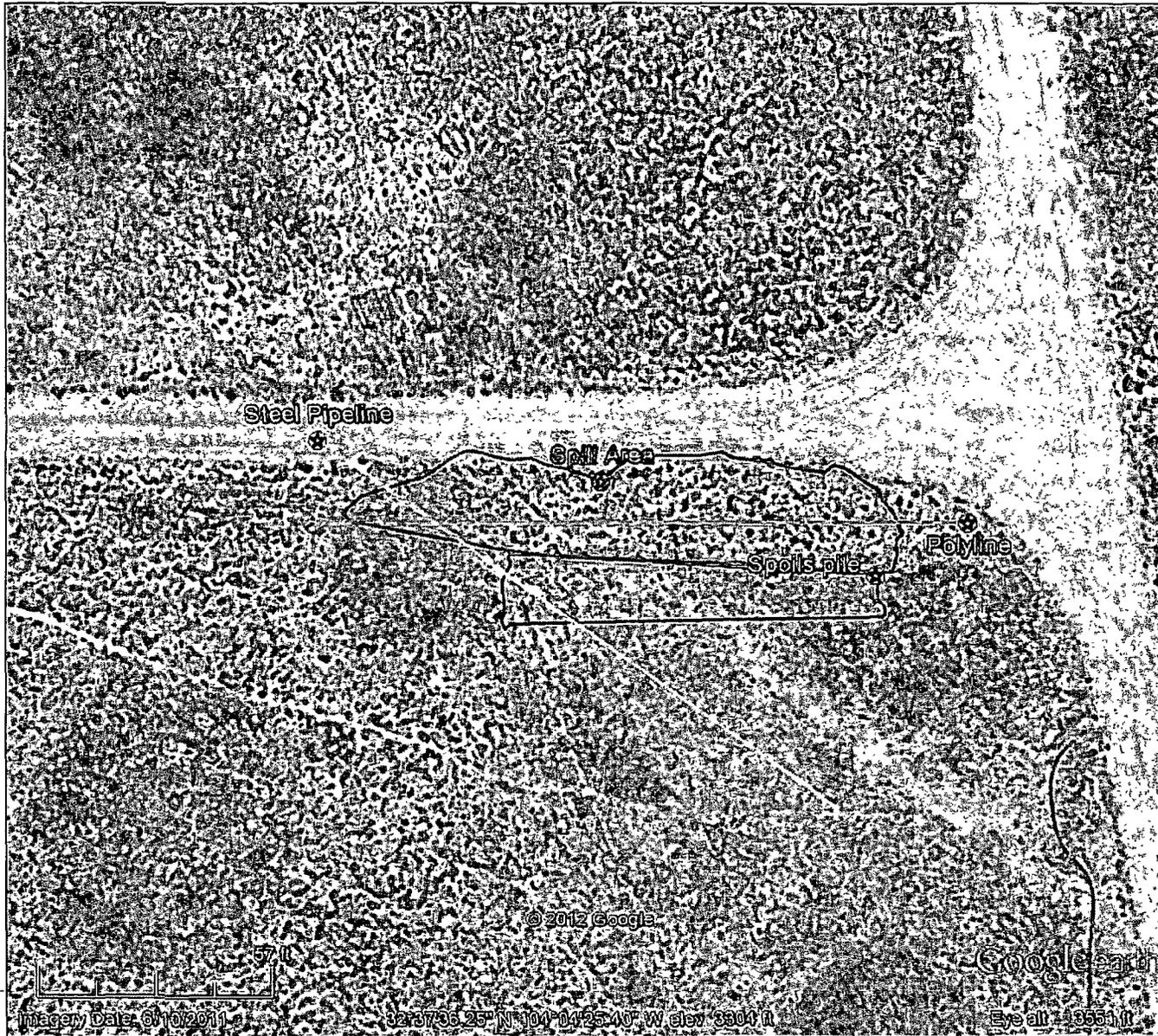




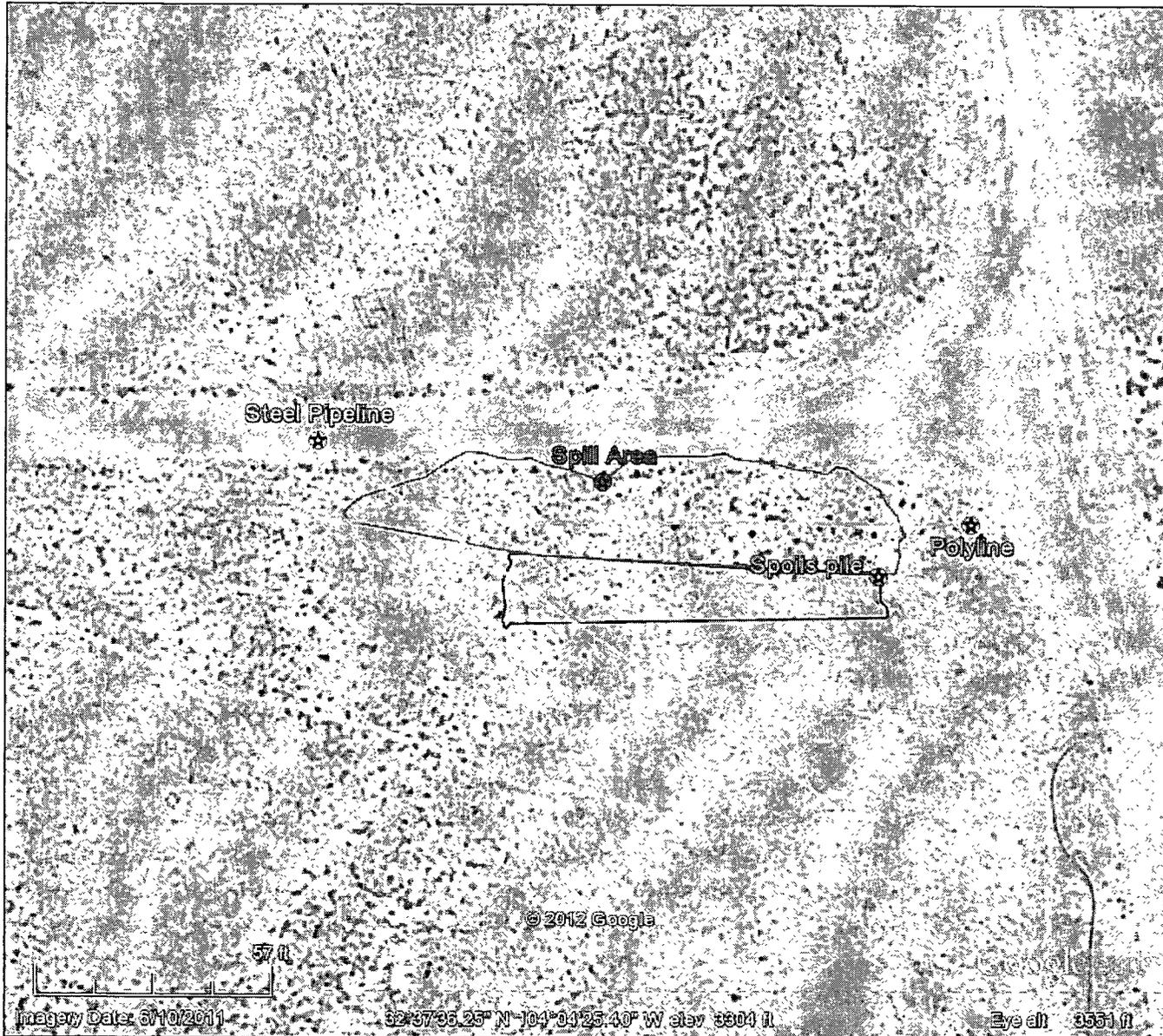


**Figure 2
Site Plan**





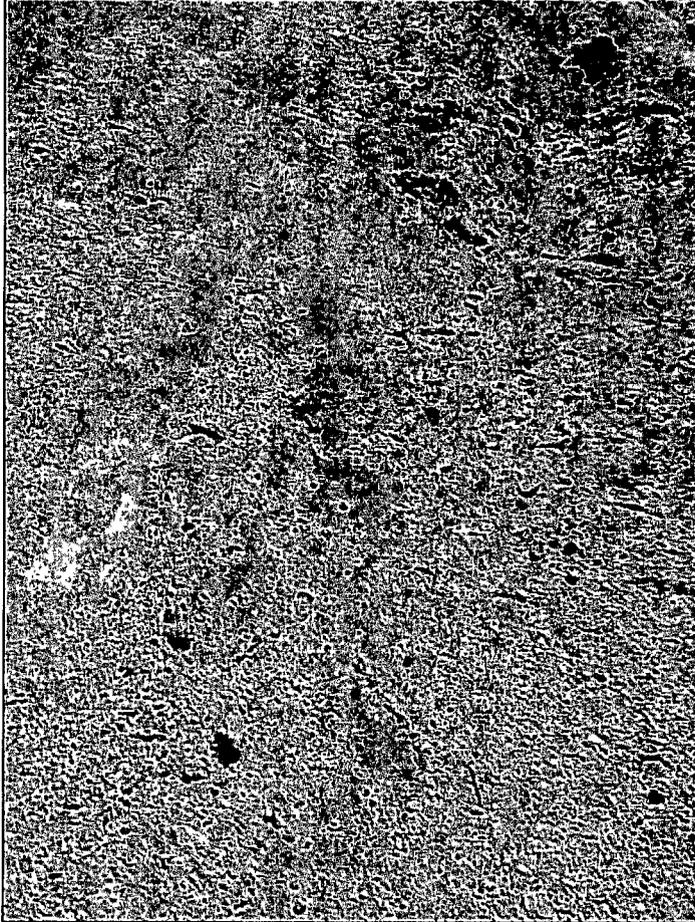
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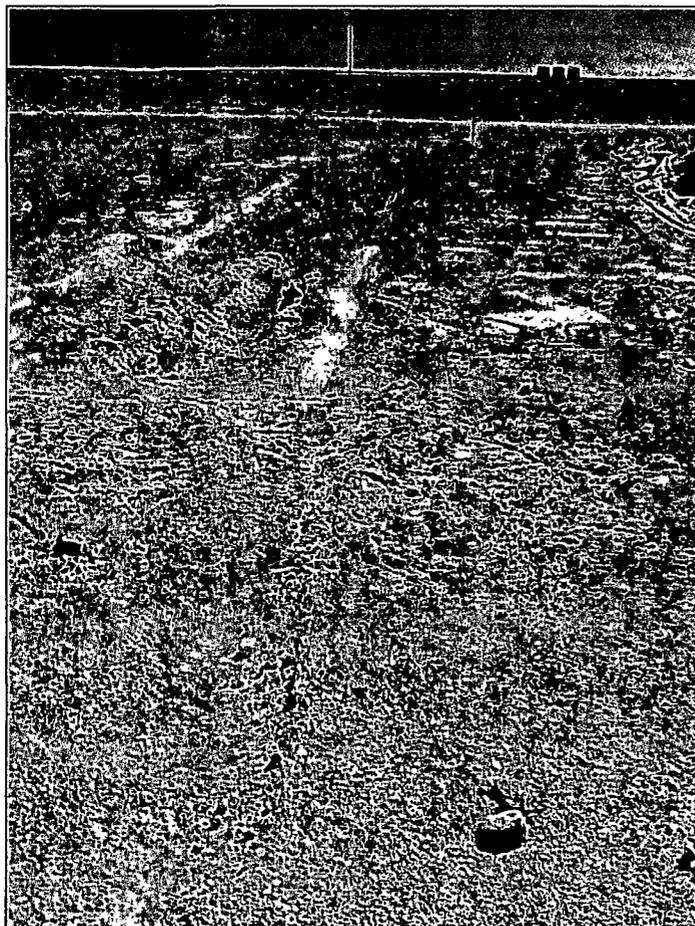
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Appendix A Site Photographs

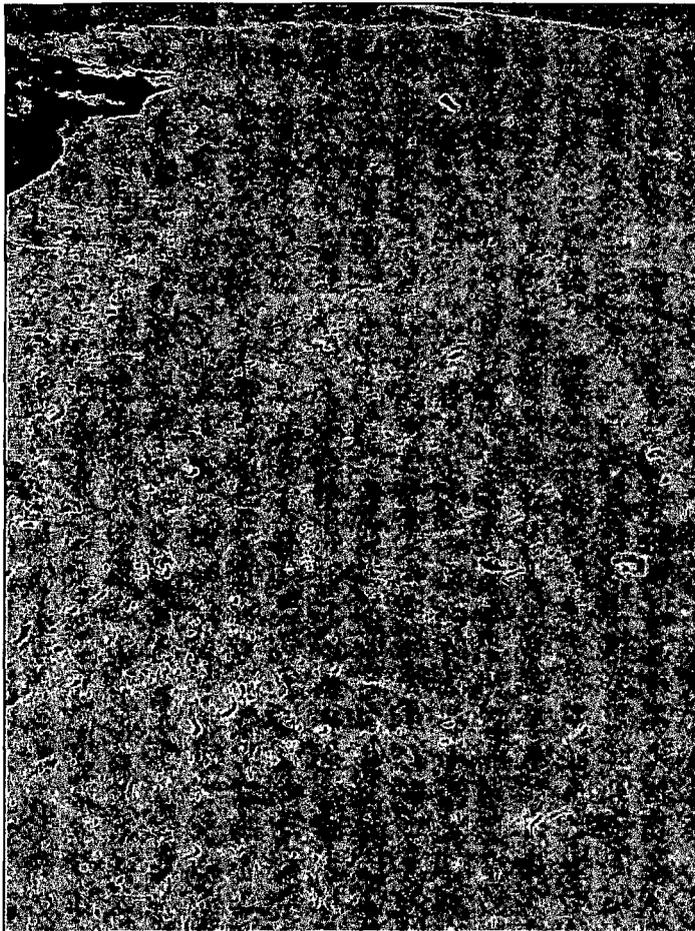
Site Photographs April 3, 2012



Surface staining north of spill area



Spill area facing east



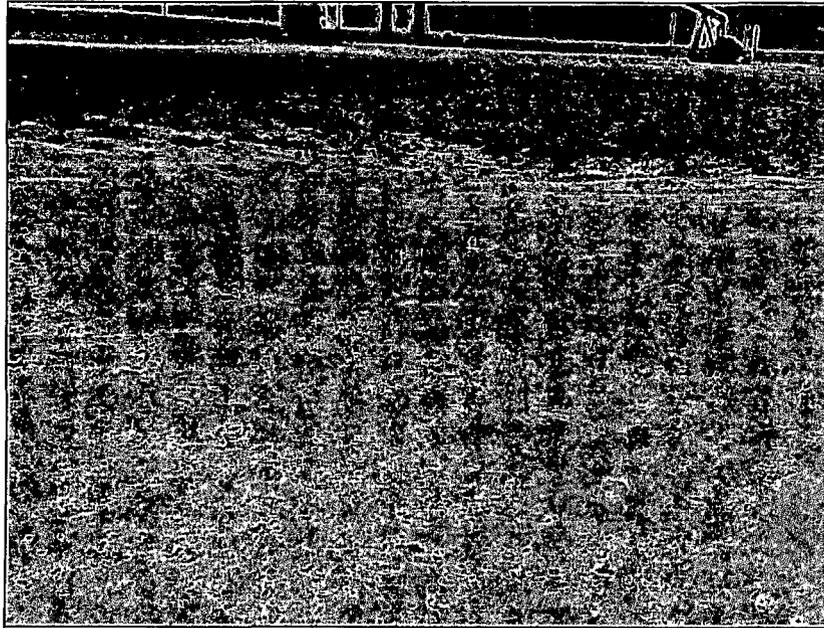
Spill area facing west



Spoils pile facing east



Spoils pile facing west



Visible staining west of spill area

Appendix B
C-141

District I
1625 N French Dr., Hobbs, NM 88240
District II
1301 W Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S St Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company	Holly Energy Partners	Contact	Jeff Stubblefield
Address	1602 W Main Street Artesia, NM 88210	Telephone No	972-322-5782
Facility Name	St Mary's Federal	Facility Type	Gathering Line
Surface Owner	BLM	Mineral Owner	
		Lease No.	

LOCATION OF RELEASE

Unit Letter	Section 28	Township T19S	Range 29E	Feet from the	North/South Line	Feet from the	East/West Line	County Eddy
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Latitude N 32.62700

Longitude W 104.07345

NATURE OF RELEASE

Type of Release	Crude Oil	Volume of Release	~120 bbls	Volume Recovered	110 bbls
Source of Release	4" steel pipeline	Date and Hour of Occurrence	12/13/2011 2:30 p.m.	Date and Hour of Discovery	12/13/2011 2:45 p.m.
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If Y.E.S. To Whom?	Randy Dade 575-626-1372		
By Whom?	Lori Coupland	Date and Hour	12/13/2011 6:00 p.m. - left voicemail		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If Y.E.S. Volume Impacting the Watercourse	N/A		
If a Watercourse was Impacted Describe Fully *					
N/A					
Describe Cause of Problem and Remedial Action Taken *					
B&H Construction was excavating in the area and hit the 4" steel pipeline with a trackhoe (HEP did not receive notification of planned excavation per the one-call ticket #2011491401). Clean-up crews have been dispatched and free product has been removed. Sleeves have been applied to the pipe where damage occurred. Contaminated soil will be removed and our environmental contractor will finalize a clean-up plan.					
Describe Area Affected and Cleanup Action Taken *					
All released product flowed into the ditch adjacent to the road. The free product has been recovered via vacuum truck. The contaminated soil will be excavated beginning 12/14/2011.					
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.					
Signature: <i>Lori Coupland</i>			OIL CONSERVATION DIVISION		
Printed Name: Lori Coupland			Approved by District Supervisor		
Title: Mgr Regulatory Compliance			Approval Date:		Expiration Date:
E-mail Address: lori.coupland@hollyenergy.com			Conditions of Approval		Attached <input type="checkbox"/>
Date: 12/13/2011 Phone: 575.748.4076					

Attach Additional Sheets If Necessary