

1R - 248

APPROVALS

YEAR(S):

2008

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, October 15, 2008 2:08 PM
To: 'BLFISH@sunocoinc.com'
Cc: Price, Wayne, EMNRD; Johnson, Larry, EMNRD; 'Gates, Mike'
Subject: 1R248 Termination

RE: "Closure Report"
for Sunoco's
Lea Crude Oil Truck Station Site
Section 28, T20S, R37E, Lea County, New Mexico
Remediation Plan (1R-248) Termination

Dear Mr. Fish:

The New Mexico Oil Conservation Division (OCD) has received the closure report for the Lea Crude Oil Truck Station Site, dated August 24, 2007, and has conducted a review of the report and additional groundwater monitoring data of nearby wells. The closure report, submitted for the above reference site, indicates that the Sunoco has met the closure requirements. Therefore, the OCD hereby approves the closure report and gives notice that the Remediation Plan (1R-248) is terminated. However, the three groundwater monitoring wells must be plugged and a plugging report sent to the OCD within 60 days.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

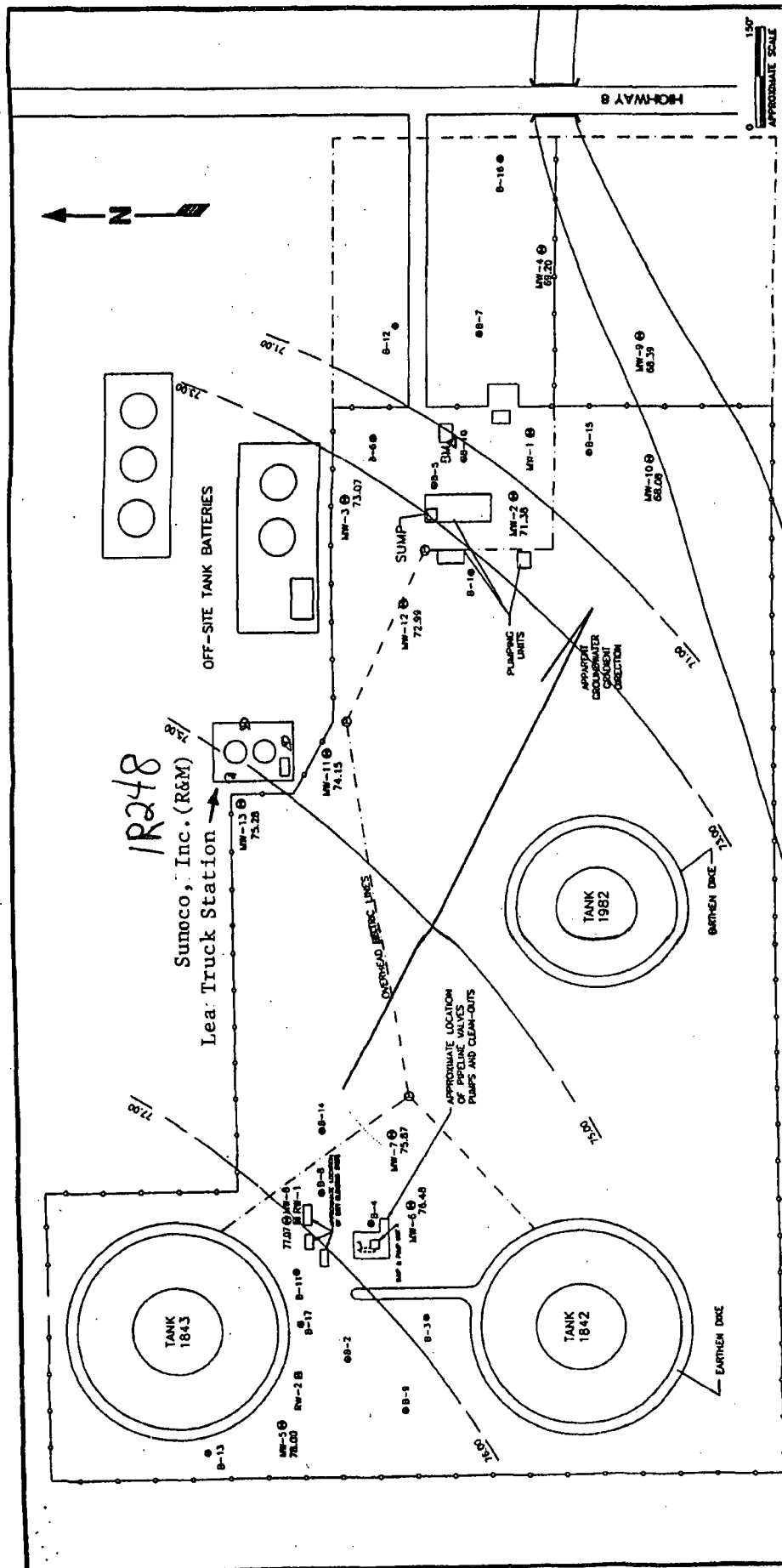
If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

10/15/2008

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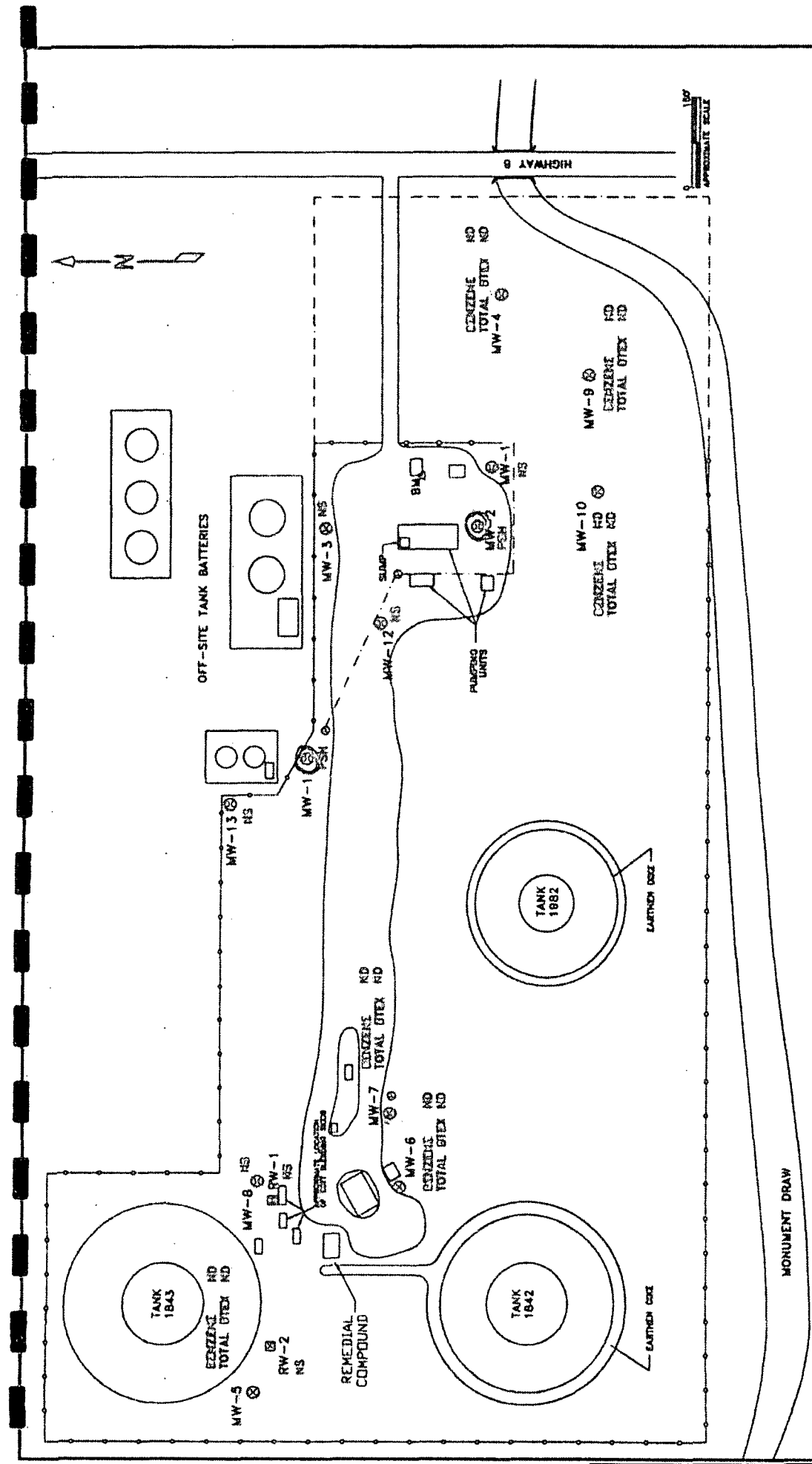
- o The hydrocarbons dissolved in groundwater at Sun's three monitoring wells are below the detection limits or are present in trace concentrations, near the detection limits for all analytes;
- o The east-southeastward groundwater flow direction indicated by this study is consistent with the regional flow direction described for the Laguna Valley area;
- o The source of the minimal groundwater impacts at Sun's Lea Station is not certain, given the myriad of potential sources in the area, such as oil-encrusted soils adjacent to the facility, dripping valves, numerous pipelines, LNAPL in nearby monitoring wells, etc.;
- o The Lea Station is not the source of the LNAPL in a monitoring well located about 57 feet south of Sun's monitoring well MW99-3, based on:
 - o The soil and groundwater sampling results;
 - o The absence of LNAPL in any of Sun's three monitoring wells, including a monitoring well (MW99-3) located between Sun's tanks and the offsite well that contains LNAPL;
 - o The presence of oily crusts at the surface just outside of the Lea Station enclosure to the west and to the south;
 - o The abundance of alternative potential sources of the LNAPL, such as the oiling of roads, the numerous pipelines, storage tanks, valves and fittings, and oil wells in the area;
- o The LNAPL in the monitoring well 57 feet south of Sun's monitoring well MW99-3, ^(1R240) may be the source of the minimal hydrocarbon concentrations in groundwater at Sun's Lea Station.



LEA STATION SHELL PIPELINE COMPANY LEA COUNTY, NEW MEXICO	
DATE: APRIL 1996	SCALE: SEE ABOVE
PROJECT NUMBER: EV-379	FIGURE NUMBER: 1
ENERCON SERVICES, INC. 1221 RIVER BEND, SUITE 259 DALLAS, TEXAS 75247	

GROUNDWATER GRADIENT MAP

-CONTOUR INTERVAL = 2.00 FOOT
-STATIC WATER LEVELS OBTAINED 4/13/96



1R240 <

DISSOLVED HYDROCARBON CONCENTRATION MAP

CONCENTRATIONS IN mg/L (ppm)
 NS - NOT SAMPLED
 ND - NONE DETECTED
 PSH - PSH FOUND IN WELL NOT SAMPLED

LEA STATION SHELL OIL PRODUCTS US LEA COUNTY, NEW MEXICO		SCALE: SEE ABOVE	PROJECT NUMBER: EO-102	FOUR NUMBER: 9
DATE: OCTOBER 8, 2002		ENERCON SERVICES, INC. 2775 VILLA CREEK SUITE 120 DALLAS, TEXAS 75234		

MW-11

Report Date: April 17, 2002
EQ 102Order Number: A02041213
97236398Page Number: 5 of 10
Lea Station

Param	Flag	Result	Units	Dilution	RDL
Benzene		2.89	mg/L	50	0.001
Toluene		0.193	mg/L	50	0.001
Ethylbenzene		0.968	mg/L	50	0.001
M,P,O-Xylene		0.538	mg/L	50	0.001
Total BTEX		4.59	mg/L	50	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
TFT		0.0876	mg/L	50	0.10	87	70 - 130
4-BFB		0.0884	mg/L	50	0.10	88	70 - 130

Sample: 194766 - MW-12

Analysis: BTEX Analytical Method: S 8021B QC Batch: QC19553 Date Analyzed: 4/13/02
 Analyst: CG Preparation Method: S 5030B Prep Batch: PB18831 Date Prepared: 4/13/02

Param	Flag	Result	Units	Dilution	RDL
Benzene		0.301	mg/L	5	0.001
Toluene		<0.005	mg/L	5	0.001
Ethylbenzene		0.164	mg/L	5	0.001
M,P,O-Xylene		<0.005	mg/L	5	0.001
Total BTEX		0.465	mg/L	5	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
TFT		0.0848	mg/L	5	0.10	84	70 - 130
4-BFB		0.0931	mg/L	5	0.10	93	70 - 130

Sample: 194767 - MW-13

Analysis: BTEX Analytical Method: S 8021B QC Batch: QC19553 Date Analyzed: 4/13/02
 Analyst: CG Preparation Method: S 5030B Prep Batch: PB18831 Date Prepared: 4/13/02

Param	Flag	Result	Units	Dilution	RDL
Benzene		<0.001	mg/L	1	0.001
Toluene		<0.001	mg/L	1	0.001
Ethylbenzene		<0.001	mg/L	1	0.001
M,P,O-Xylene		<0.001	mg/L	1	0.001
Total BTEX		<0.001	mg/L	1	0.001

Surrogate	Flag	Result	Units	Dilution	Spike Amount	Percent Recovery	Recovery Limits
TFT		0.0904	mg/L	1	0.10	90	70 - 130
4-BFB		0.0907	mg/L	1	0.10	91	70 - 130

TABLE 2
WATER SAMPLE ANALYTICAL RESULTS

Monitor Well	Date Sampled	Benzene	Toluene	Ethyl-benzene	Xylenes	Total BTEX	TPH	TDS
MW-1	12/21/92	0.440	0.005	0.120	0.063	0.628	3	2,380
	02/16/93	0.350	0.010	0.095	0.070	0.525	5	--
MW-2	02/16/93	0.370	0.040	0.210	0.510	1.130	1	--
MW-3	02/16/93	2.500	0.010	0.370	0.640	3.520	2	--
MW-4	02/16/93	<0.001	<0.001	<0.001	<0.001	<0.001	<1	--
MW-5	02/16/93	<0.001	<0.001	0.002	0.004	0.006	<1	--
MW-6	02/16/93	0.002	0.001	<0.001	0.091	0.094	<1	2,500
MW-7	02/16/93	<0.001	<0.001	<0.001	<0.001	<0.001	<1	--
MW-8	09/30/93	PSH	PSH	PSH	PSH	PSH	PSH	PSH
MW-9	09/30/93	<0.001	<0.001	<0.001	<0.001	<0.001	<1	2,130
MW-10	09/30/93	<0.001	<0.001	0.009	0.001	0.010	7	--
MW-11	09/30/93	0.24	0.14	0.11	0.14	0.63	3	--
WW-1	12/08/92	<0.001	<0.001	<0.001	<0.001	<0.001	5	1,800

BTEX results listed in m/l (parts per million; ppm) with a method detection limit of 0.001 ppm.

TPH and DO results listed in mg/l (parts per million; ppm) with a method detection limit of 1 ppm.

Analyses were conducted using EPA Method 8020 (BTEX), EPA Method 418.1 (TPH), and EPA Method 160.1 (TDS) by SPL Environmental Laboratories and CEL Laboratories.

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, May 07, 2008 2:03 PM
To: 'Mike.Gates@arcadis-us.com'
Cc: Price, Wayne, EMNRD
Subject: RE: 1R0248 Sunoco Lea Crude Station

Dear Mr. Gates:

The New Mexico Oil Conservation Division (NMOCD) has reviewed your 2006 Annual Report and Request for Closure for the above-reference site. At this time the NMOCD cannot approve your Request for Closure of this site. The Report indicates that the groundwater concentrations for some constituents (e.g., TDS, Chloride) still exceed the Water Quality Control Commission standards. The Request for Closure must clearly demonstrate that these exceedances are not from the site. For MW-1 and MW-2 please submit data regarding the regional groundwater quality and/or possible off-site contamination. For MW-3 please submit data regarding possible off-site contamination. Data from a site(s) other than the Sunoco site may be used for this purpose.

If you have any questions regarding this matter, please call me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department 1220 S. St. Francis Dr.
Santa Fe, NM 87505

-----Original Message-----

From: Gates, Mike [mailto:Mike.Gates@arcadis-us.com]
Sent: Friday, April 18, 2008 1:35 PM
To: Price, Wayne, EMNRD
Cc: FISH, BRADFORD L
Subject: FW: 1R0248 Sunoco Lea Crude Station

Wayne,

Attached is a copy of the last annual report for site 1R0248 where we documented regional water quality and requested closure of this former crude release site (See the e-mail train below). Please send closure letter to the following:

Sunoco, Inc.
Atten: Brad Fish
AutoLab
Blueball Ave & Post Road
P.O. Box 1135
Marcus Hook, PA 19061

Please copy me on the closure information.

Thank you for your assistance.

Michael Gates
ARCADIS
5100 East Skelly Drive, Suite 1000
Tulsa, OK 74135
918.850.1052 (Cell)
918.664.9900 (Office)

-----Original Message-----

From: Gates, Mike

Sent: Tuesday, February 19, 2008 9:33 AM
To: 'wayne.price@state.nm.us'
Subject: FW: 1R0248 Sunoco Lea Crude Station

Wayne,

Here is the PDF version of the last annual report on this site that was dated August 24, 2007.

See the e-mail trail below. There is correspondence from you indicating the site is 1R0248 where you asked for documentation on regional water quality that would justify closure of this site. The reference we provided is from a New Mexico Bureau of Mines & Mineral Resources Publication dated 1952 that shows groundwater quality (sulfate and chloride) throughout this region and including this site that demonstrates that the water quality at this site is consistent with regional quality dating back to 1952.

We would like to request closure of this incident. Let me know if you have any questions.

Thanks
Mike

Michael Gates
ARCADIS
5100 East Skelly Drive, Suite 1000
Tulsa, OK 74135
918.850.1052 (Cell)
918.664.9900 (Office)

-----Original Message-----

From: Gates, Mike
Sent: Wednesday, January 09, 2008 2:28 PM
To: 'wayne.price@state.nm.us'
Cc: 'FISH, BRADFORD L'
Subject: RE: 1R0248 Sunoco Lea Crude Station

Wayne,

In case your copy of the subject report has been misplaced, I am attaching a copy for your review.

Please call me at your convenience to discuss.

Thanks
Mike

Michael Gates
ARCADIS
5100 East Skelly Drive, Suite 1000
Tulsa, OK 74135
918.850.1052 (Cell)
918.664.9900 (Office)

-----Original Message-----

From: Gates, Mike
Sent: Tuesday, January 08, 2008 5:17 PM
To: 'wayne.price@state.nm.us'
Cc: FISH, BRADFORD L
Subject: RE: 1R0248 Sunoco Lea Crude Station

Wayne,

ARCADIS prepared a response to your e-mail below and submitted it to you in a letter report dated August 24, 2007. We believe the information provided in the report

substantiates the conclusion that the chloride measurements in groundwater at this site are associated with regional groundwater quality and not the crude oil release in which we are requesting closure. Only crude oil was released for this incident and all of the hydrocarbon issues have been resolved for some time.

ARCADIS is requesting that OCD issue a closure for this site.

Please let me know if you have any questions.

Thanks
Mike

Michael Gates
ARCADIS
5100 East Skelly Drive, Suite 1000
Tulsa, OK 74135
918.850.1052 (Cell)
918.664.9900 (Office)

-----Original Message-----

From: Price, Wayne, EMNRD <wayne.price@state.nm.us>
To: Hall, Sharon E.
Sent: Fri Apr 28 14:26:55 2006
Subject: 1R0248 Sunoco Lea Crude Station

Dear Mr. Gates:

OCD is in receipt of the closure request dated April 06, 2006 for the above subject site. The report indicates there is chloride levels that exceed the groundwater standard are a result of a regional issue. In order for OCD to issue closure please provide information on the chloride regional issue.

Wayne Price
Oil Conservation Div.
1220 S. Saint Francis
Santa Fe New Mexico 87505

phone: 505-476-3490
fax: 505-476-3462

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