

1R - 155

**GENERAL
CORRESPONDENCE**

YEAR(S):

1995-1992

**ENRON
OPERATIONS CORP.**

OIL CONSERVATION DIVISION
RECEIVED

95 JAN 10 AM 8 52

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

VIA CERTIFIED MAIL: P 362 442 889

January 10, 1995

Mr. Roger Anderson
Environmental Engineer
State of New Mexico
Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

Subject: Change of Ownership

Dear Mr. Anderson:

The object of this letter is to advise the New Mexico Oil Conservation Division that effective December 29, 1994, ENRON / Northern Natural Gas Company has completed the sale of the following properties to GPM:

1. Hobbs Gas Plant
2. Hobbs Compressor Station #1
3. Hobbs Compressor Station #2
4. Hobbs Compressor Station #3
5. Hobbs Compressor Station #4
6. Hobbs Compressor Station #5
7. Eddy Compressor Station #1
8. Eddy Compressor Station #2
9. Eddy Compressor Station #3

Because of the change in ownership, GPM has assumed the responsibility for the following items which have been on-going between ENRON and the OCD:

1. **Hobbs Gas Processing Plant**

Oil/Water Separator - Former Liquid Waste Disposal Area: ENRON submitted drafts of the Remedial Design Report, Construction Specifications, and Drawings for OCD's review.

2. **Hobbs Compressor Station #2**

On October 7, 1994, OCD reviewed ENRON's report of "SUBSURFACE INVESTIGATION AT HOBBS COMPRESSOR STATION NO.2 AND HOBBS NATURAL GAS PROCESSING PLANT". OCD requested that six items of information be submitted to the OCD by January 31, 1995 (Copy enclosed). OCD's request was faxed to Vince Bernard of GPM on October 11, 1994, who agreed to respond to items #1, 5, and 6. ENRON's response to the remaining items is:

Mr. Roger Anderson
January 10, 1994
Page No. 2

Item #2: The stockpiled soil at Hobbs Compressor Station #2 was disposed of in C. & C. Landfarm in Monument, New Mexico. The landfarm is owned by Jimmy Cooper.

Item #3: The purged groundwater at Hobbs Gas Plant was disposed of in the landfarm at the site. The water from Hobbs C.S. #2 has been arranged to be disposed of at the USPCI facility in Wenoka, Oklahoma. Because of the close of sale on December 28, 1994, the seven drums of water were moved from Hobbs C.S. #2 to ENRON's Eunice plant for temporary storage. USPCI has scheduled to pick the drum during the week of January 16, 1995. The disposal methods for the water were approved by Bill Olson (copy enclosed).

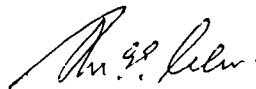
Item #4: The final dimensions of the excavations at Hobbs Compressor Station No. 2 are shown on the enclosed Figure 1.

The name and address of the GPM contact person is:

Vince Bernard, Director
Safety & Environmental Affairs
New Mexico Region
GPM Gas Services Company
4044 Penbrook, Odessa, Texas 79762
Phone: (915) 368-1085
Fax: (915) 368 1170

Should you have any questions, please feel free to call me at (713) 646-7337.

Sincerely,



Akhtar A. Alvi, P.E.
Senior Environmental Engineer
Environmental Affairs Department

CC: Vince Bernard, GPM, W/O Enclosure

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, New Mexico 87505



February 15, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-210

Vincent B. Bernard
GPM Gas Corporation
4044 Penbrook
Odessa, TX 79762

**RE: CONTAMINATED SOIL DISPOSAL
HOBBS #1, HOBBS #3 AND HOBBS #5 COMPRESSOR STATIONS
LEA COUNTY, NEW MEXICO**

Dear Mr. Bernard:

On December 7, 1994, the New Mexico Oil Conservation Division (OCD) received correspondence from ENRON Operations Company dated September 29, 1993 requesting to dispose of contaminated soils at either the C & C Landfarm or the OCD permitted landfarm at ENRON's Hobbs Gas Plant. The contaminated soils which are stockpiled at ENRON's Hobbs #1, Hobbs #3 and Hobbs #5 compressor stations were generated as a result of remedial actions. Since GPM Gas Corporation is currently the owner of these facilities, the OCD's response is directed to GPM.

The above referenced disposal request is approved under the following conditions:

1. GPM will analyze the soils from each station for TCLP chlorinated organics.
2. The results of the TCLP chlorinated organics analysis will be submitted to the OCD for approval prior to disposal of the soils.
3. All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

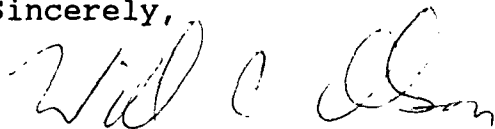
2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

Mr. Vincent B. Bernard
February 15, 1995
Page 2

Please be advised that OCD approval of does not relieve GPM of liability should their operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other state, federal or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Hobbs District Office

PS Form 3800, June 1990

P 557 242 210
Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street & No.	
P.O., State & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

Fold at line over top of envelope to the right of the return address.

ENRON
Operations Company

11525 West Carlsbad Highway, Hobbs, New Mexico 88240 (505) 393-5109
September 29, 1993

State of New Mexico Oil Conservation Division
Mr. Bill Olsen
Hydrogeologist
P.O. Box 2088
Santa Fe, NM 87504

RECEIVED

7
DEC 05 1994 *red*

OIL CONSERVATION DIV.
SANTA FE

Dear Mr. Olsen,

Enclosed you will find the final analysis from the bottom hole soil samples taken from Hobbs #1, Hobbs #5 and Hobbs #3 UST sites. Further excavation is not possible due to the solid rock encountered at the bottom of the excavation sites. Soil excavated at these sites is currently be placed on plastic and covered with plastic until we can haul it to the land farm at the Hobbs Plant, or be given permission from your office for removal to C & C Land Farm for remediation. Clean backfill soil is being purchased to backfill the open excavations, and at this time we would like final closure at these sites. Please contact me if I can be of further assistance at (505)393-5109 ex 25.

Sincerely,

Mike Kneese

Mike Kneese
Environmental Field Technician

xc: Akhtar Alvi
Lou Soldano
Dennis Howell
file w/attachments



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1795

Project Name: Hobbs #1 Tank Removal
Location: Hobbs #1
Sampled by: MK
Analyzed by: MF
Sample Type: Soil

Date: 9/19/93 Time: 10:00
Date: 9/20/93 Time: 9:23
Sample Condition: GIST

Units: mg/kg

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	9319093-Used Oil Tank Bottom	83.4	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
2	9319094-New Oil Storage Bottom	3.4	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
3	9319095-Glycol Storage Bottom	508.2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
4	9319096-Pipeline Liquid	28.3	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

QC Recovery	435.2	1.004	0.865	0.978	0.956	0.958	0.993
QC Spike	405.9	0.881	0.865	0.869	0.866	0.860	0.886
Accuracy	107.2%	113.8%	100.0%	112.5%	110.4%	111.4%	112.1%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540 OR 3510

Michael R. Fowler

Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1795-1

Project Name: Hobbs #1 Tank Removal
Location: Hobbs #1
Sampled by: MK
Sample Type: Soil


Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319093 - Used Oil Tank Bottom

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	2.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1795-2

Project Name: Hobbs #1 Tank Removal
Location: Hobbs #1
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319094 - New Oil Storage Bottom

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	2.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1795-3

Project Name: Hobbs #1 Tank Removal
Location: Hobbs #1
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319095 - Glycol Storage Bottom

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	3.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1795-4

Project Name: Hobbs #1 Tank Removal
Location: Hobbs #1
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319096 - Pipeline Liquid

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	1.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1794

Project Name: Hobbs #3 Tank Removal
Location: Hobbs #3
Sampled by: MK
Analyzed by: MF
Sample Type: Soil

Date: 9/19/93 Time: 9:45
Date: 9/20/93 Time: 9:13
Sample Condition: GIST

Units: mg/kg

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	Used Glycol-Btm #9319091	170.2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
2	Used Oil-Bottom #9319092	<1.0	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

QC Recovery	435.2	1.004	0.865	0.978	0.956	0.958	0.993
QC Spike	405.9	0.881	0.865	0.869	0.866	0.860	0.886
Accuracy	107.2%	113.8%	100.0%	112.5%	110.4%	111.4%	112.1%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - GAS CHROMOTOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540 OR 3510


Michael R. Fowler

9-28-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1794-1

Project Name: Hobbs #3 Tank Removal
Location: Hobbs #3
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: Hobbs 3 Used Glycol Bottom #9319091

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	2.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1794-2

Project Name: Hobbs #3 Tank Removal
Location: Hobbs #3
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: Hobbs 3 Used Oil Bottom #9319092

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	<0.1	mg/L
Barium	2.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000

Michael R. Fowler

9/29/93

Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 8/29/93
Lab #: H1796

Project Name: Hobbs 5 Pit Closure

Location: Hobbs 5

Sampled by: MK

Analyzed by: MF

Sample Type: Soil

Date: 9/19/93

Time: 11:30

Date: 9/20/93

Time: 9:30

Sample Condition: GIST

Units: mg/kg

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	9319097-Pipeln Liquids Bottom	<1.0	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
2	9319098-Used Oil Bottom	325.8	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

QC Recovery	435.2	1.004	0.865	0.978	0.956	0.958	0.993
QC Spike	405.9	0.881	0.865	0.869	0.866	0.860	0.886
Accuracy	107.2%	113.8%	100.0%	112.5%	110.4%	111.4%	112.1%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - GAS CHROMATOGRAPHY; INFRARED SPECTROSCOPY
- EPA SW-846; 8020, 418.1, 3540 OR 3510

Michael R. Fowler

9-29-93

Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1796-1

Project Name: Hobbs 5 Pit Closure
Location: Hobbs 5
Sampled by: MK
Sample Type: Soil

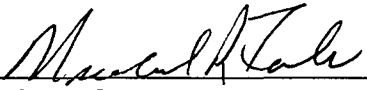
Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319097 - Pipeline Liquids Bottom

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	0.2	mg/L
Barium	1.0	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	<0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

8-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company: Enron Gas Processing
Address: 11525 W. Carlsbad Hwy.
City, State: Hobbs, NM 88240

Date: 9/28/93
Lab #: H1796-2

Project Name: Hobbs 5 Pit Closure
Location: Hobbs 5
Sampled by: MK
Sample Type: Soil

Date: 9/19/93
Sample Condition: GIST

Sample ID: 9319098 - Used Oil Bottom

TCLP INORGANICS (Leachate)

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Silver	<0.1	mg/L
Arsenic	0.1	mg/L
Barium	0.9	mg/L
Cadmium	<0.1	mg/L
Chromium	<0.1	mg/L
Mercury	<0.1	mg/L
Lead	0.1	mg/L
Selenium	<0.1	mg/L

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000


Michael R. Fowler

9-29-93
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

April 15, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-337

Mr. Michael Kneese
ENRON Gas Processing Company
11525 W. Carlsbad Highway
Hobbs, New Mexico 88240

**RE: PIPELINE CONDENSATE TANK REMEDIATION
HOBBS COMPRESSOR STATIONS NO. 1, NO. 3 AND NO. 5
LEA COUNTY, NEW MEXICO**

Dear Mr. Kneese:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing ENRON's January 1993 "FORMER LIQUID PIPELINE CONDENSATE STORAGE SITE, HOBBS COMPRESSOR STATION NO. 1, FIELD INVESTIGATION REPORT" and ENRON's January 1993 "FORMER LIQUID PIPELINE CONDENSATE STORAGE SITE, HOBBS COMPRESSOR STATION NO. 5, FIELD INVESTIGATION REPORT". These documents were hand delivered to OCD on March 10, 1993. The documents detail the results of ENRON's investigation of the extent of contamination resulting from the past use of below grade tanks at the Hobbs Compressor Station No. 1 and the Hobbs Compressor Station No. 5.

The reports appear to have adequately defined the extent of contamination related to the below grade tanks at the facilities. However, the OCD has the following comments and requests for additional information regarding the above referenced documents:

1. The reports do not include the results of the final contaminant levels upon completion of the excavation of contaminated soils. Please supply OCD with this information.
2. According to the reports ENRON is considering options for treatment/disposal of the contaminated soils excavated during the remediation projects. Please submit a proposal to OCD for treatment/disposal of these wastes.

(NOTE: Mainline natural gas compressor stations are not exempt from RCRA Subtitle C Hazardous Waste requirements. Subsequently, these soils must be tested, prior to treatment/disposal, to demonstrate that they do not exhibit hazardous waste characteristics.)

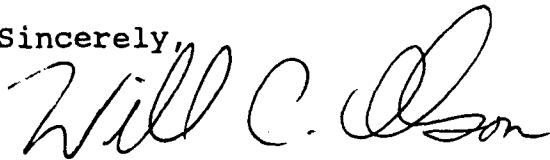
Mr. Michael Kneese
April 15, 1993
Page 2

3. The reports do not include recommendations for final closure of the excavations. Please submit a plan for final closure.

Upon a review of the ENRON file it was noted that OCD is awaiting the final results of a hazardous waste characterization of contaminated soils from remedial activities at the Hobbs No. 3 compressor station. Please provide OCD with this information and a plan for final closure of the former below grade tanks sites which includes disposal or remediation of the contaminated soils.

Submission of the above information will allow OCD to complete a review of the remedial activities at the Hobbs No. 1, No. 3 and No. 5 compressor stations. If you have any questions, please contact me at (505) 827-5885.

Sincerely,

A handwritten signature in cursive script, reading "Will C. Olson".

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Hobbs Office

RECEIVED

OCT 21 1992

OIL CONSERVATION DIV.
SANTA FE

ENRON GAS PROCESSING COMPANY
11525 W. CARLSBAD HIGHWAY
HOBBS, NEW MEXICO 88240
(505) 393-5109

October 19, 1992

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

This letter is to inform your Office that a pipeline condensate tank at our Hobbs #1 plant was replaced with a steel tank inside concrete containment. In the removal of this tank we discovered two abandoned fiberglass tanks which were buried directly North of the condensate tank. We also discovered contamination from the overfilling of the pipeline liquids tank during upsets in the 1970s. This was stopped in the early 1980s. Excavation of the contaminated site commenced. A hole approximately 150'x 75'x 30'deep was excavated, and sample results show a drastic reduction in the TPH levels. Enron Gas Processing in Houston made a decision to hire a consulting/contracting firm out of Albuquerque, N.M. to determine the extent of the contamination, and determine what remedial action should be taken. IT Corp. will be contacting your office with the results of there findings. Attached you will find a copy of the results of our July sample. You will also receive a copy of our latest sample results as soon as I receive them from the lab.

If you may require any additional information, please contact me at 393-5109 ext.25

Sincerely,

Michael C. Kneese
Michael Kneese
Field Technician

xc: Jim Peterson w/attachments
file

Received: 07/31/92

SAMPLE ID 3-086 N. OF EOTT

FRACTION 01B

TEST CODE STRPH

NAME Total petroleum HCs/soil

Category SOIL

Date & Time Collected 07/30/92

REPORT

Work Order # 92-07-366

3711 Admiral Suite C • Las Alamos, Texas 79525

Results by Sample

PARAMETER	RESULT	LIMIT	D_F	DATE_ANAL
Total Petroleum HCs	<u>87,000</u>	<u>5.0</u>	<u>500</u>	<u>08/11/92</u>

Notes and Definitions for this Report:

EXTRACTED _____
 ANALYST DH
 UNITS mg/Kg
 BATCH_ID STRPH-0014
 PRcnt_MOIST N/A



Member: American Council of
Independent Laboratories, Inc.

THIS REPORT MUST NOT BE USED IN ANY MANNER BY THE CLIENT OR ANY OTHER THIRD PARTY TO CLAIM PRODUCT ENDORSEMENT BY THE
NATIONAL LABORATORY VOLUNTARY ACCREDITATION PROGRAM OR ANY OTHER AGENCY OF THE UNITED STATES GOVERNMENT.

NVLAP

