

1R - 234

APPROVALS

YEAR(S):

1999



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

August 17, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-697

Mr. Kyle Landreneau
Equiva Services LLC
28510C Tomball Parkway, PMB Suite 406
Tomball, Texas 77375

**RE: MONITOR WELL WORK PLAN
SHELL DENTON CRUDE STATION**

Dear Mr. Landreneau:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Oil Company's (Shell) June 18, 1999 "WORKPLAN FOR DRILLING, SAMPLING AND INSTALLATION OF ONE MONITOR WELL LOCATED SOUTH OF DENTON STATION ON THE DARR ANGEL RANCH IN LEA COUNTY, NEW MEXICO" which was submitted on behalf of Shell by Equiva Services LLC (Equiva). This document contains Shell's work plan for installation of an additional ground water monitoring well to delineate the extent of ground water contamination at the former Shell Denton Crude Station.

The work plan for additional investigations as contained in the above referenced document is **approved with the following conditions:**

1. The proposed location of monitor well MW-16 shall be relocated and installed at the location as shown on figure 1 (attached).
2. The water quality sampling of the proposed monitor well shall coincide with a regularly scheduled water quality sampling of other site monitor wells.
3. Monitor wells MW-13 and MW-14 which are shown as "wells to be abandoned" shall not be plugged and abandoned until final closure of the site has been issued by the OCD.
4. SHELL shall submit the results of the investigations and proposed modifications to the existing ground water monitoring program in the annual report to the OCD.
5. SHELL will notify the OCD at least 1 week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit SHELL to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL of responsibility for compliance with any other federal, state or local laws and regulations.

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

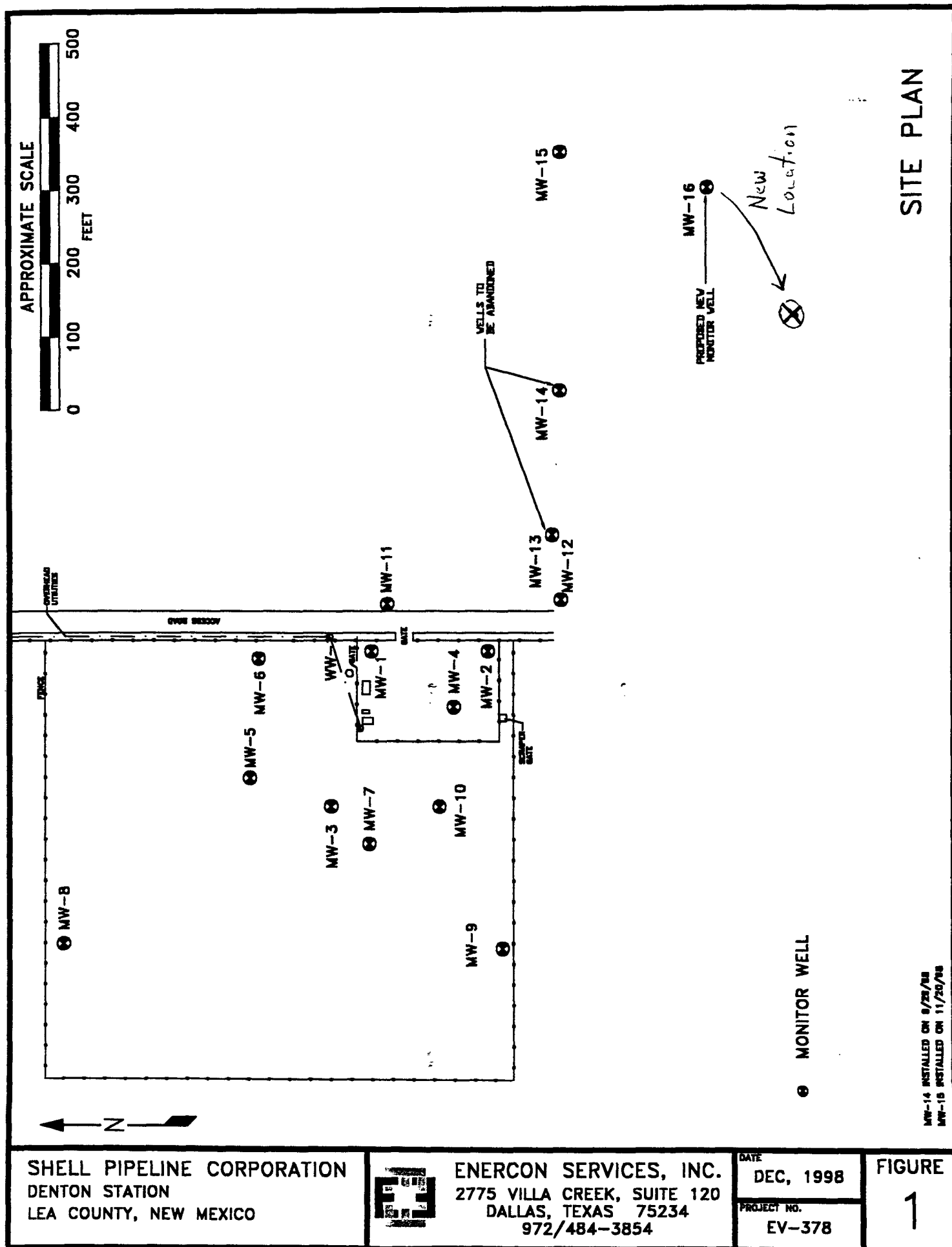
Sincerely,

A handwritten signature in black ink, appearing to read 'W.C. Olson', written in a cursive style.

William C. Olson
Hydrologist
Environmental Bureau

attachment

xc w/attachment: Chris Williams, OCD Hobbs District Supervisor





June 18, 1999

Mr. William Olsen
New Mexico Oil and Gas Conservation District
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: WORKPLAN FOR DRILLING, SAMPLING AND INSTALLATION OF ONE MONITOR WELL LOCATED SOUTH OF DENTON STATION ON THE DARR ANGEL RANCH IN LEA COUNTY NEW MEXICO.

Dear Mr. Williams:

Equiva Services LLC (Equiva) is pleased to present this work plan on behalf of Shell Oil Company for the installation and sampling of one monitor well at the above-referenced site located in Lea County, New Mexico. Monitoring well MW-15 was previously installed at the site for delineation purposes.

Scope of Work

The scope of work was prepared based on a letter received by Equiva Services from the New Mexico Oil and Conservation District (NMOCD) dated May 24, 1999. Based upon previously installed wells at the site, Equiva proposes installation of one (1) monitor well to a depth of approximately 65 feet below surface grade (bsg). The monitor well (MW-16) will be installed down gradient of MW-14 and MW-15 (Figure 1). Regional groundwater gradient direction is to the southeast.

During drilling activities, the soils will be field screened for volatile organic constituents with a Photoionization Detector (PID) using headspace techniques. Two soil samples, one collected from above groundwater and one sample from the zone exhibiting the highest PID measurements will be collected from the soil boring and submitted to Southern Petroleum Laboratories (SPL) in Houston, Texas for analysis of BTEX and TPH using EPA methods GCMS 8240 and 418.1 respectively. The boring will then be converted to a monitor well.

28510C Tomball Parkway PMB Suite 406, Tomball TX 77375
Phone 281-252-6914 Facsimile 281-252-6917

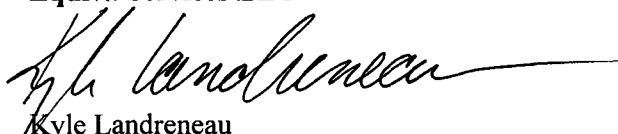
The monitor well will be installed using a 4-inch inside diameter, schedule 40 polyvinyl chloride riser, and a 15-foot long, 0.010 inch slotted screen. The screen will be placed at the bottom of the boring and extended to 5 feet above the groundwater. Gravel pack will be set around the well screen from the bottom of the well to two feet above the top of the well screen. A two-foot bentonite plug will be placed above the gravel pack. The remainder of the wellbore will be sealed with cement containing 3-5% bentonite, and capped with two feet of cement. The well will be completed with a flush-mount manhole cover and a four-foot by four-foot thick concrete pad and locking cap.

The monitor well will be developed by pumping or handbailing a minimum of three well volumes or until conductivity, pH, and temperature have stabilized within 5% for three consecutive readings. Groundwater samples will be collected from the monitor well and submitted to Southern Petroleum Laboratories (SPL) of Houston, Texas for analysis of BTEX and PAH using EPA method GCMS 8240 and 8310, respectively. Immediately following installation of the monitor well, the elevation and location of the monitor well will be surveyed. Upon completion and sampling of the monitoring well a report detailing the site activities and summarizing the data collected. The report will include a geologic log, well completion diagram, laboratory analytical data, and a groundwater contour elevation map.

Schedule

It is anticipated that the project will be initiated within two weeks of notification to proceed by the NMOCD (dependent on subcontractor availability). If you have any questions concerning this letter, please contact me at 281-252-6914.

Sincerely,
Equiva Services LLC


Kyle Landreneau
Environmental Geologist

cc: Chris Williams, NMOCD Hobbs, New Mexico

28510C Tomball Parkway PMB Suite 406, Tomball TX 77375
Phone 281-252-6914 Facsimile 281-252-6917



PERMANENT
UNITIES

ACCESS ROAD

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MW-8

MW-5 MW-6

MW-3

MW-7

MW-10

MW-9

MW-4

MW-2

MW-11

MW-13

MW-12

MW-14

MW-15

MW-16

PROPOSED NEW
MONITOR WELL

WELLS TO
BE ABANDONED



MONITOR WELL

SITE PLAN

MW-14 INSTALLED ON 9/26/88
MW-15 INSTALLED ON 11/20/88

SHELL PIPELINE CORPORATION
DENTON STATION
LEA COUNTY, NEW MEXICO



ENERCON SERVICES, INC.
2775 VILLA CREEK, SUITE 120
DALLAS, TEXAS 75234
972/484-3854

DATE
DEC, 1998
PROJECT NO.
EV-378

FIGURE
1



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 24, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-663

Mr. Kyle Landreneau
Equiva Services LLC
28569 Tomball Parkway #406
Tomball, Texas 77375

**RE: NOTICE OF DEFICIENCY
SHELL DENTON CRUDE STATION**

Dear Mr. Landreneau:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Oil Company's (Shell) April 7, 1999 "INSTALLATION OF MW-15 FOR DENTON STATION, LEA COUNTY, NEW MEXICO" which was submitted on behalf of Shell by Equiva Services LLC (Equiva). This document contains the results of the installation of an additional ground water monitoring well to delineate the extent of ground water contamination at the former Shell Denton Crude Station.

The above referenced document shows that monitor well MW-15 has delineated the eastern lateral extent of contamination at the site. However, the downgradient extent of contamination at the site still has not been determined. A review of the OCD's file on this site shows that Shell did not submit a work plan for completing the definition of the downgradient extent of ground water contamination as required in the OCD's February 8, 1999 correspondence. To correct this deficiency, the OCD requires that Equiva submit a work plan to complete the definition of the downgradient extent of ground water contamination at the site. The work plan shall be submitted to the OCD Santa Fe Office by June 25, 1999 with a copy provided to the OCD Hobbs District Office.

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 Supervisor

Z 274 520 663

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (*See reverse*)

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Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

April 7, 1999

New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation District
Mr. William C. Olson
2040 South Pacheco Street
Santa Fe, NM 87505

**RE: INSTALLATION OF MW-15 FOR DENTON STATION
LEA COUNTY, NEW MEXICO**

Dear Mr. Olson:


This is in response to your February 8, 1999, letter concerning definition of the downgradient extent of groundwater contamination at the above referenced site. Enclosed is information about the drilling, installation and sampling of MW-15 at Denton Station.

On November 20, 1998 Enercon Services installed one monitor well designated MW-15 to a depth 65 feet approximately 500 feet east of MW-14. The well was drilled to delineate the downgradient edge of the hydrocarbon plume. After installation, the well was properly developed and sampled.

The water samples were sent to Southern Petroleum Laboratories in Houston, TX and analyzed for benzene, toluene, ethyl-benzene, and total xylenes using EPA Method 8240. All tests showed concentrations below detectable limits.

If you have any questions or concerns, please do not hesitate to contact me at (281) 252-6914.

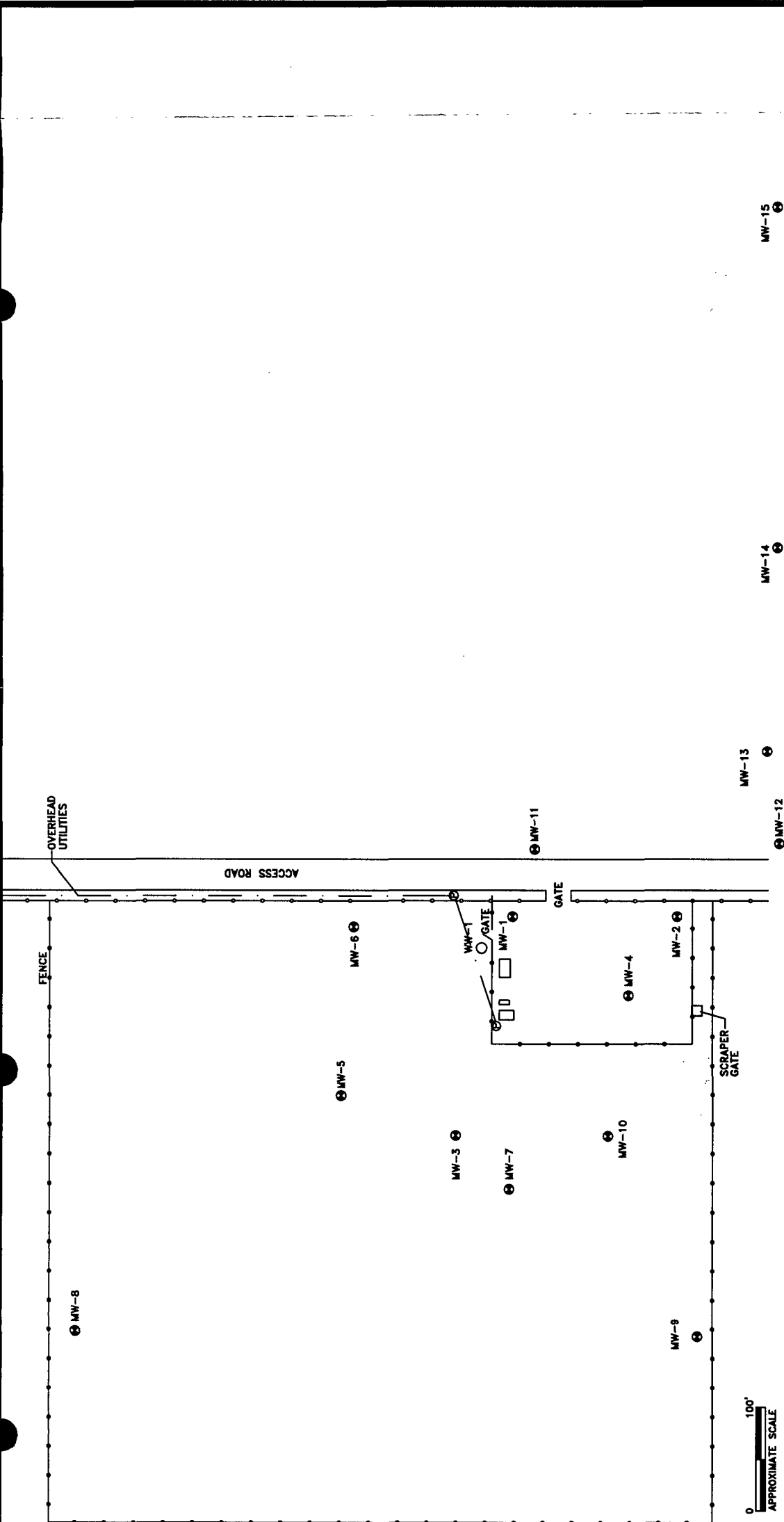
Sincerely,
Equivia Services, LCC, on behalf of Shell Oil Company


Kyle Landreneau
SHE Science & Engineering
Environmental Geologist

Cc: Mr. Chris Wilson, OCD Hobbs District Supervisor
Mr. Paul Newman, EOTT Energy
Mr. Charles Harlan, Enercon Services, Inc.

Encl. Figure 1: Site Map
MW-15 Well Log
MW-15 Laboratory Data

SITE PLAN

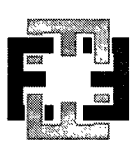


0 100' APPROXIMATE SCALE

⊗ MONITOR WELL

MW-14 INSTALLED ON 9/29/98
MW-15 INSTALLED ON 11/20/98

SHELL PIPELINE CORPORATION
DENTON STATION
LEA COUNTY, NEW MEXICO



ENERCON SERVICES, INC.
2775 VILLA CREEK, SUITE 120
DALLAS, TEXAS 75234
972/484-3854

DATE
DEC, 1998
PROJECT NO.
EV-378

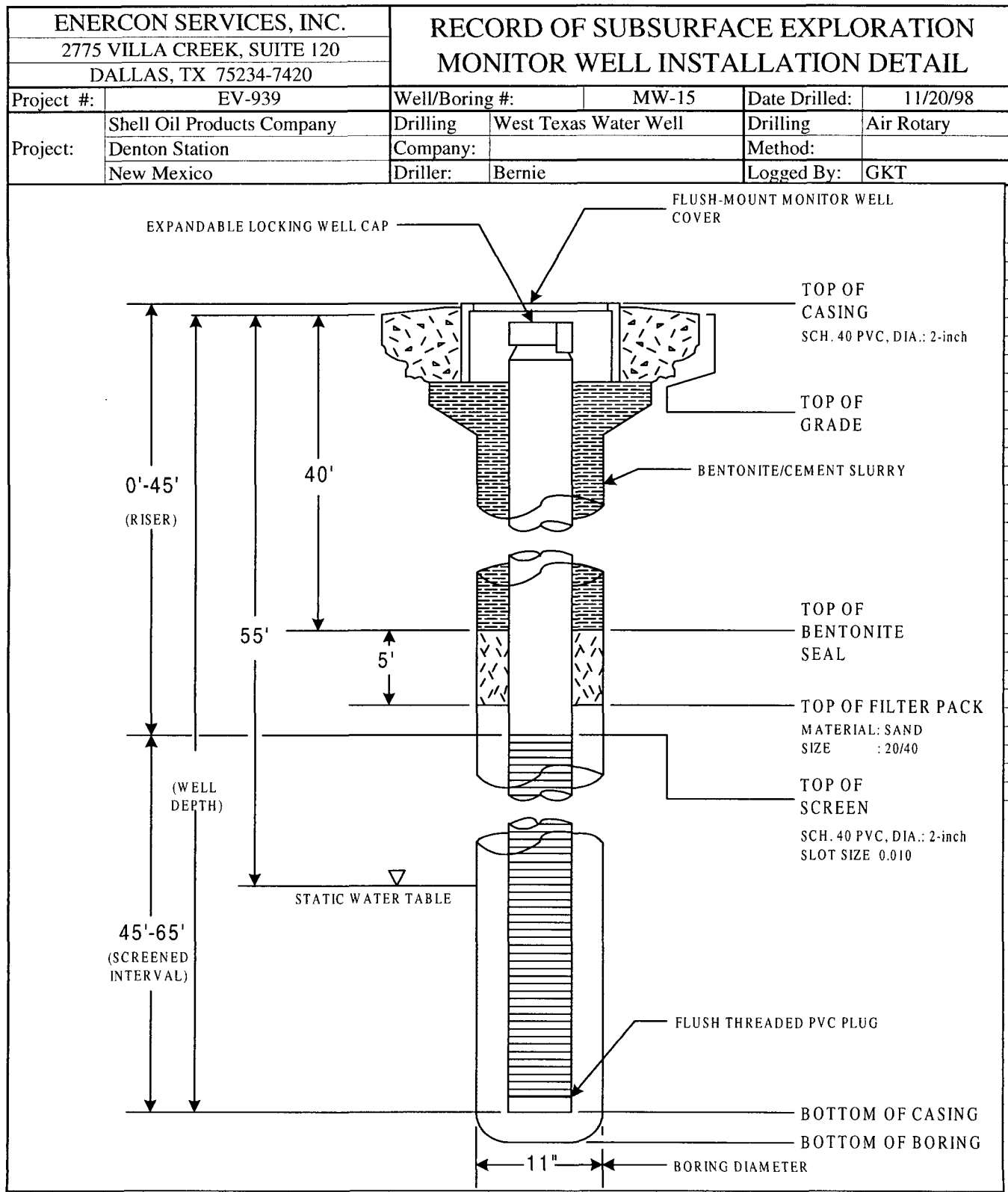
FIGURE
1

ENERCON SERVICES, INC. 2775 VILLA CREEK, SUITE 120 DALLAS, TX 75234-7420		RECORD OF SUBSURFACE EXPLORATION			
Project #: EV-939		Well/Boring #: MW-15		Date Drilled: 11/20/98	
Project: Shell Oil Products Company Denton Station New Mexico		Drilling West Texas Water Well Company:		Drilling Air Rotary Method:	
		Driller: Bernie		Logged By: GKT	
DEPTH (FEET)	SOIL DESCRIPTION	SAMPLE NUMBER	SAMPLE TYPE	OVA (PPM)	REMARKS
0.0	Brown SAND and CLAY White CALICHE				
10.0					
20.0	Tan SAND				
30.0					
40.0					
50.0	55' Groundwater encountered				
60.0					
70.0	TD @ 65'				
80.0					

ABBREVIATIONS AND SYMBOLS

SS - Driven Split Spoon
 ST - Pressed Shelby Tube
 CA - Continuous Flight Auger
 RC - Rock Core
 THD - Texas Highway Department Cone
 CT-5' - Continuous Sampler

HSA - Hollow Stem Auger
 CFA - Continuous Flight Augers
 DC - Driving Casing
 MD - Mud Drilling





HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9901703-08

Shell Pipe Line Corporation
P.O. Box 2648
Houston, TX 77252
ATTN: Neal Stidham

P.O.#
MESA-CAO-B-131201-PX-4204-NS
02/03/99

PROJECT: Denton Station
SITE: Lea County
SAMPLED BY: Enercon Sevices
SAMPLE ID: MW-15

PROJECT NO:
MATRIX: WATER
DATE SAMPLED: 01/13/99 12:30:00
DATE RECEIVED: 01/16/99

ANALYTICAL DATA				
PARAMETER	RESULTS	PQL*	UNITS	
Benzene	ND	5	ug/L	
Ethylbenzene	ND	5	ug/L	
Toluene	ND	5	ug/L	
Xylenes (total)	ND	5	ug/L	
SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
1,2-Dichloroethane-d4	50 ug/L	88	80	120
Toluene-d8	50 ug/L	104	88	110
4-Bromofluorobenzene	50 ug/L	88	86	115

ANALYZED BY: GLT DATE/TIME: 01/21/99 22:34:00
METHOD: 8240, Volatile Organics - Water
NOTES: * - Practical Quantitation Limit ND - Not Detected
 NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance
with EPA guidelines for quality assurance.



HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-9901703-08

Shell Pipe Line Corporation
P.O. Box 2648
Houston, TX 77252
ATTN: Neal Stidham

P.O.#
MESA-CAO-B-131201-PX-4204-NS
02/03/99

PROJECT: Denton Station
SITE: Lea County
SAMPLED BY: Enercon Sevices
SAMPLE ID: MW-15

PROJECT NO:
MATRIX: WATER
DATE SAMPLED: 01/13/99 12:30:00
DATE RECEIVED: 01/16/99

ANALYTICAL DATA				
PARAMETER	RESULTS	PQL*	UNITS	
Naphthalene	ND	0.1	ug/L	
Benzo (a) pyrene	ND	0.1	ug/L	
1-Methylnaphthalene	ND	0.1	ug/L	
2-Methylnaphthalene	ND	0.1	ug/L	
SURROGATES	AMOUNT SPIKED	% RECOVERY	LOWER LIMIT	UPPER LIMIT
1-Fluoronaphthalene	0.50 ug/L	85	50	150
Phenanthrene d-10	0.50 ug/L	89	50	150

ANALYZED BY: KA DATE/TIME: 01/26/99 08:18:40
EXTRACTED BY: KL DATE/TIME: 01/17/99 14:00:00
METHOD: 8310 Polynuclear Aromatic Hydrocarbons
NOTES: * - Practical Quantitation Limit ND - Not Detected
 NA - Not Analyzed

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance
with EPA guidelines for quality assurance.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 8, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-621

Mr. Kyle Landreneau
Equiva Services LLC
28569 Tomball Parkway #106
Tomball, Texas 77375

**RE: GROUND WATER MONITORING REPORT
SHELL DENTON CRUDE STATION**

Dear Mr. Landreneau:

The New Mexico Oil Conservation Division (OCD) has reviewed Equiva Services LLC's (Equiva) December 22, 1998 "ANNUAL MONITORING REPORT, DENTON STATION, LEA COUNTY, NEW MEXICO". This document contains the results of Equiva's 1998 ground water contamination investigation, remediation and monitoring activities at the former Shell Denton Crude Station.

A review of this document shows that the downgradient extent of contamination has not been determined to date. Therefore, the OCD requires that Equiva submit a work plan to complete the definition of the downgradient extent of ground water contamination at the site. The work plan will be submitted to the OCD Santa Fe Office by April 1, 1999 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Will Olson", written over a horizontal line.

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor

Z 274 520 621

US Postal Service

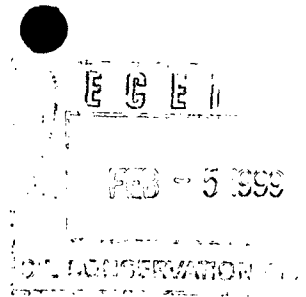
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Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



February 1, 1999

To:

Michael Nash
Koch Industries
PO Box 2256
Wichita, KS 67201

Randall Ross
Texas Railroad Commission
110 S. Taylor St.
PO Box 2141
San Angelo, TX 76902-2141

Paul Newman
EOTT Energy Corporation
PO Box 4666
Houston, Texas 77210-4666

Joe Cress
Texas Railroad Commission
241 Pine Street, Suite 6-B
PO Box 1681
Abilene, TX 79604

William C. Olson
State Of New Mexico
Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, NM 87504

Everett Wilson
Oklahoma Corporation Commission
Pollution Abatement Dept.
Jim Thorpe Building
2101 N. Lincoln
Oklahoma City, OK 73105

Leslie Savage
Texas Railroad Commission
Oil & Gas Division
PO Box 12967
Austin, Texas 78711-2967

Charlie Ross
Texas Railroad Commission
214 West Texas Avenue, Suite 600
Midland, Texas 79701-4610

Karl Thiel
Texas Railroad Commission
405 50th Street
Lubbock, Texas 79404-3633

Fred McNeel
Texas Railroad Commission
First Texas Building
901 Indiana Avenue, Suite 600
Wichita Falls, TX 76301-6798

As a result of the recent alliance between Shell, Texaco, and Star, many remediation projects have been reassigned. This letter is to inform you that I have been assigned to manage pipeline remediation activities at sites in Texas, Oklahoma, and New Mexico formally managed by Neal Stidham. The sites that I will manage are:

Denton Station
Lea Station
Wheeler Station
Penwell Station
Dunes Injection
Healdton Station
Hamlin Station
E. Hamlin Pump Station
Standing Rock Station


I can be reached at the following Address

Kyle Landreneau
Equiva Services LLC
28569 Tomball Parkway #106
Tomball Texas 77375

Phone 281-252-6914
Fax 281-252-6917
Pager 800-307-0502

I appreciate your assistance in this matter.

Sincerely
EQUIVA SERVICES



Kyle Landreneau
Environmental Geologist

December 22, 1998

William Olson
State of New Mexico Oil Conservation Division
Environmental Bureau
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RECEIVED

DEC 23 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Project Management Changes for New Mexico Environmental Projects

Dear Mr. Olson

I would like to take this opportunity to introduce. My name is Kyle Landreneau with Equiva Services LLC. Equiva services is the new Shell-Texaco-Saudi Refining Alliance company that provides environmental service to the two Alliance operating companies Equilon Enterprises and Motiva Enterprises. I am assuming environmental management duties for a number of sites previously handled by Neal Stidham. Neal has recently accepted a position with Equilon and will be working on other projects. I will be managing the Lea Station and Denton Station that were previously handled by Neal.

I am currently in transition for office space. After the New Year, I will be working out of a home office. The address listed below will remain my permanent mailing address but my phone numbers will be changing in the few weeks. I hope to travel to Santa Fe to meet with you after the New Year.

Sincerely
EQUIVA SERVICES LLC



Kyle Landreneau
SHE-Science & Engineering Mid-Continent
Environmental Geologist

December 22, 1998

William Olson
State of New Mexico Oil Conservation Division
Environmental Bureau
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

11:23

Re: Annual Monitoring Report, Denton Station, Lea County, New Mexico

Dear Mr. Olson

Enclosed is the 1998 Annual Groundwater Monitoring Report for the Denton Station project. Along with PSH recovery and groundwater sampling in 1998, a new monitoring well (MW-14) was installed and an electromagnetic imaging (EM) survey was conducted in an attempt to delineate the subsurface hydrocarbon plume. The study proved inconclusive. The ORS remediation system experienced a number of shutdowns during 1998 due to the well pumps. We plan to repair or replace the current pumps in 1998. Dissolved BTEX concentrations remained stable across the site in 1998.

Should you have any questions concerning this project please contact me at 281-587-1114

Sincerely
EQUIVA SERVICES LLC



Kyle Landreneau
SHE-Science & Engineering Mid-Continent
Environmental Geologist