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APPROVALS

YEAR(S):

1999



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

CONSERVATION DIVISION
DISTRICT I HOBBS
PO BOX 1980, Hobbs, NM 88241
(505) 393-6161
FAX (505) 393-0720

Jennifer A. Salisbury
CABINET SECRETARY

November 1, 1999

**CERTIFIED MAIL Z 402 901 815
RETURN RECEIPT REQUESTED**

Greg Vratil
Equilon Pipeline Company
P.O. Box 1910
Midland, Tx 79702

Re: Work Plan for Sam Cooper Ranch Remediation Project

Dear Mr. Vratil:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the work plan dated September 9, 1999, and received on October 14, 1999, for the above captioned project. NMOCD Environmental Bureau Representatives, Donna Williams and Wayne Price, visited the site on October 25, 1999, and observed remediation activities and oilfield waste being deposited into un-permitted landfarms.

In order for NMOCD to properly evaluate the submitted work plan, Equilon Pipeline is required to submit the following additional information by November 15, 1999.

1. Equilon Pipeline must demonstrate that all waste would be Exempt or is classified as RCRA Non-Hazardous per EPA CFR 40 part 261.
2. Provide a legal survey and plot plan for each proposed remediation and landfarm site. Include on each plot plan the location and/or distance to any buried pipeline or significant surface equipment or feature.
3. Submit to NMOCD site assessment information per NMOCD guidelines for each proposed remediation and landfarm site. Please demonstrate for each site how Equilon Pipeline determined the estimated closure values for TPH and BTEX.
4. Submit a copy of the site safety and health plan.

In addition, the NMOCD has the following requirements:

1. Equilon Pipeline must submit to the NMOCD Environmental Bureau an application for all landfarms pursuant to 19 NMAC 15.I .711 (Rule 711) by November 10, 1999. Please contact Martyne Kieling at 505-827-7153 concerning landfarm permits.
2. Equilon Pipeline is hereby ordered not to cover or close any site without first notifying the NMOCD District office. Please notify the NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and/or split samples during OCD's normal working hours.
3. Equilon Pipeline is hereby ordered to secure all work sites pursuant to the work plan. During NMOCD's site inspection there were no fences around pits and the landfarm areas were not bermed.
4. Equilon Pipeline must submit EPA approved third party laboratory analytical results for each sample collected for final site closure. Equilon shall maintain records for all field screening sampling events. NMOCD will require bottom hole and sidewall samples for each site. Bottom hole samples may be a five point composite, if there are no obvious "hot spots". All hot spots shall be delineated. These final results may be submitted in the final closure report.

Equilon Pipeline is hereby notified and is required to submit for NMOCD approval a site investigation and/or a remediation plan(s) for any future sites and/or cleanup projects.

Please note failure to abide by all of the above requirements in a timely fashion may result in a "Notice of Violation" being issued to Equilon Pipeline Company.

Sincerely,



Chris Williams - District I Supervisor

cc: Roger Anderson-Environmental Bureau Chief
Martyne Kieling-Environmental Bureau
File