

1R - 324

APPROVALS

YEAR(S):

2005

Price, Wayne

From: Price, Wayne
Sent: Monday, February 21, 2005 9:37 AM
To: 'Goates, R. Neal'
Subject: RE: Reed A Request for Closure 1R0324

OCD hereby approves of the closure plan and requires no further action.

Please be advised that NMOCD approval of this plan does not relieve (ConocoPhillips) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (ConocoPhillips) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Neil please resend photos for our files.

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

From: Goates, R. Neal [mailto:Neal.Goates@conocophillips.com]
Sent: Tuesday, February 08, 2005 12:37 PM
To: Wayne Price
Subject: FW: Reed A Request for Closure

Wayne,

I know your busy but I wanted to check to see if you had a chance to accept our closure regarding the Reed A Site? Cooper landfarm was used, site restored, and all is well at this point.

Thanks,

Neal

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

From: Clyde Yancey [mailto:CYancey@maximusa.com]
Sent: Tuesday, February 08, 2005 1:36 PM
To: Goates, R. Neal
Cc: Charles Durrett
Subject: FW: Reed A Request for Closure

Charlie asked that I send this to you.

Clyde L. Yancey, P.G.
Maxim Technologies
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
505-237-8440
505-237-8656 (fax)

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

From: Cwdurrett1@aol.com [mailto:Cwdurrett1@aol.com]
Sent: Wednesday, December 29, 2004 8:01 AM
To: WPrice@state.nm.us; Cwilliams@state.nm.us
Cc: neal.goates@conocophillips.com; ronald.g.crouch@conocophillips.com; c-john.coy@conocophillips.com; cyancey@maximusa.com

Subject: Reed A Request for Closure

Reed A Historic Tank Battery Site
NE¼, SW¼, Sec 24, T20S, R36E
Request for Closure

2/21/2005

Wayne, attached is the closure report for the Reed A project. Approximately 6,000 CY material were removed from area to a depth of 4+ feet and hauled to South Monument Waste Facility. The site was backfilled with native soil.

Based on the work performed at this Site, Maxim recommends no further action is required. Upon your review and approval of this report, Maxim on behalf of ConocoPhillips, requests closure of NMOCD Case No. 1R-324. If you have any questions or need additional information, please call Mr. Neal Goates (ConocoPhillips, 823-379-6427) or me.

Please acknowledge receipt of this e-mail. If you would like a hard copy of this report, please let me know.

--
Charlie Durrett
Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085

+++++CONFIDENTIALITY NOTICE+++++

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Price, Wayne

From: Goates, R. Neal [Neal.Goates@conocophillips.com]
Sent: Tuesday, February 08, 2005 12:37 PM
To: Wayne Price
Subject: FW: Reed A Request for Closure

Wayne,
I know your busy but I wanted to check to see if you had a chance to accept our closure regarding the Reed A Site? Cooper landfarm was used, site restored, and all is well at this point.
Thanks,
Neal

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

From: Clyde Yancey [mailto:CYancey@maximusa.com]
Sent: Tuesday, February 08, 2005 1:36 PM
To: Goates, R. Neal
Cc: Charles Durrett
Subject: FW: Reed A Request for Closure

Charlie asked that I send this to you.

Clyde L. Yancey, P.G.
Maxim Technologies
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
505-237-8440
505-237-8656 (fax)

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

From: Cwdurrett1@aol.com [mailto:Cwdurrett1@aol.com]
Sent: Wednesday, December 29, 2004 8:01 AM
To: WPrice@state.nm.us; Cwilliams@state.nm.us
Cc: neal.goates@conocophillips.com; ronald.g.crouch@conocophillips.com; c-john.coy@conocophillips.com; cyancey@maximusa.com

Subject: Reed A Request for Closure

Reed A Historic Tank Battery Site
NE¼, SW¼, Sec 24, T20S, R36E
Request for Closure
NMOCD Case No. 1R-324

Wayne, attached is the closure report for the Reed A project. Approximately 6,000 CY of material were removed from area to a depth of 4+ feet and hauled to South Monument Waste Facility. The site was backfilled with native soil.

Based on the work performed at this Site, Maxim recommends no further action is required. Upon your review and approval of this report, Maxim on behalf of ConocoPhillips, requests closure of NMOCD Case No. 1R-324. If you have any questions or need additional information, please call Mr. Neal Goates (ConocoPhillips, 823-379-6427) or me.

Please acknowledge receipt of this e-mail. If you would like a hard copy of this report, please let me know.

--
Charlie Durrett

2/21/2005

Maxim Technologies
1703 W. Industrial Ave.
Midland, TX 79701
P 432-686-8081
F 432-686-8085

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

September 28, 2004

Mr. Neal Goates
ConocoPhillips
Threadneedle 5022
600 North Dairy Ashford
Houston, Texas 77079-1175

**RE: REED "A" SITE
CASE #1R-324
LEA COUNTY, NEW MEXICO**

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has reviewed ConocoPhillips September 28, 2004 email titled "REED A PHOTOS", August 26, 2004 correspondence titled "REED A HISTORIC TANK BATTERY SITE, NE1/4, SW1/4, SEC 24, T20S, R36E, PERCHED WATER ISSUE, NMOCD CASE NO. 1R-324, MAXIM PROJECT NO. 4690024" and August 12, 2004 email titled "REED A EDITED PHOTOS". These documents provide information related to the presence of near surface ground water encountered during soil remediation actions related to a crude oil tank battery at the Reed "A" site located in the SW/4, NW/4 of Section 24, Township 20 South, Range 36 East, Lea County, New Mexico. The documents also request permission to backfill the excavation at the site.

Based upon a review of the information in the above-referenced documents and previous investigative information on the site, the OCD concurs with ConocoPhillips' conclusion that near surface water encountered at the site during excavation is not spring water or ground water, but water perched on the underlying clays from precipitation. Therefore,, the OCD approves of the above-referenced request to backfill the excavation with the following condition:

1. ConocoPhillips shall submit a report containing the results of the remedial actions to the OCD by November 28, 2004. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of the remedial activities.
 - b. A site map showing the location of the tank battery, pits, spills, excavated areas, borings, monitor wells, and any other pertinent site features.

Mr. Neal Goates
September 28, 2004
Page 2

- c. The disposition of all wastes generated.
- d. Photos of various phases of the remedial activities.

Please be advised that OCD approval does not relieve ConocoPhillips of responsibility if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Clyde Yancey, Maxim Technologies, Inc.
Clay Cooper



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 4, 2003

Mr. Neal Goates
ConocoPhillips
Threadneedle 5022
600 North Dairy Ashford
Houston, Texas 77079-1175

**RE: REED "A" SITE
CASE #1R-324
LEA COUNTY, NEW MEXICO**

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has reviewed ConocoPhillips July 18, 2003 "REED A GROUNDWATER INVESTIGATION, COOPER RANCH, LEA COUNTY, NEW MEXICO" which was submitted on behalf of ConocoPhillips by their consultant Maxim Technologies, Inc. This document contains the results of ConocoPhillips' ground water investigation related to a crude oil tank battery at the Reed "A" site located in the SW/4, NW/4 of Section 24, Township 20 South, Range 36 East, Lea County, New Mexico. The document also contains a work plan for remediation of contaminated soils at the site.

The above-referenced work plan is approved with the following conditions:

1. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
2. ConocoPhillips shall notify the OCD at least 48 hours in advance of the scheduled activities such that the OCD has the opportunity to witness the events.
3. ConocoPhillips shall submit a report containing the results of the remedial actions to the OCD by November 4, 2003. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of the remedial activities.
 - b. A site map showing the location of the tank battery, pits, spills, excavated areas, borings, monitor wells, and any other pertinent site features.

Mr. Neal Goates
September 4, 2003
Page 2

- c. The disposition of all wastes generated.
- d. Photos of various phases of the remedial activities.

Please be advised that OCD approval does not relieve ConocoPhillips of responsibility should the work plan fail to adequately remediate contamination related to ConocoPhillips' operations, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Clyde Yancey, Maxim Technologies, Inc.
Clay Cooper



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

May 23, 2003

Mr. Neal Goates
ConocoPhillips
Threadneedle 5022
600 North Dairy Ashford
Houston, Texas 77079-1175

**RE: REED "A" SITE
CASE #1R-324
LEA COUNTY, NEW MEXICO**

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has reviewed ConocoPhillips May 5, 2003 "CONOCOPHILLIPS "COOPER REED A" PIT SITE, LEA COUNTY, NEW MEXICO" and August 26, 2002 "COOPER REED A SOIL INVESTIGATION, LEA COUNTY, NEW MEXICO, MAXIM PROJECT NO. 2690018" which was received by the OCD on May 7, 2003.

These documents contain the results of ConocoPhillips' investigation of soil contamination related to a crude oil tank battery at the Reed "A" site located in the SW/4, NW/4 of Section 24, Township 20 South, Range 36 East, Lea County, New Mexico. The documents also contain a work plan for investigation of the extent of ground water contamination at the site.

The above-referenced work plan is approved with the following conditions:

1. ConocoPhillips shall obtain soil samples from each borehole from the depth interval with the highest PID reading and the bottom of the hole.
2. All soil samples shall be obtained and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), total petroleum hydrocarbons (TPH), and chloride using EPA approved methods and quality assurance/quality control (QA/QC).
3. Each monitor well shall be drilled to first water or the top of the red bed whichever is encountered first.

Mr. Neal Goates
May 23, 2003
Page 2

4. Each monitor well shall be completed as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
5. No less than 24 hours after the wells are developed, ground water from all monitor wells shall be purged, sampled and analyzed for concentrations of BTEX, polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and QA/QC.
6. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
7. ConocoPhillips shall submit the results of the investigation to the OCD by July 23, 2003. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log for each soil boring and monitor well.
 - c. A well completion diagram for each monitor well.
 - d. A site map showing the location of the tank battery, pits, spills, excavated areas, borings, monitor wells, and any other pertinent site features.

Mr. Neal Goates
May 23, 2003
Page 3

- e. A water table map showing the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
- f. Isopleth maps for contaminants observed during the investigations.
- g. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
- h. The disposition of all wastes generated.

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

The OCD would like to point out that prior soil investigation activities, as documented in the August 26, 2003 investigation report, were not carried out pursuant to OCD's work plan approval. Condition #1 and #2 of OCD's September 19, 2001 work plan approval letter to ConocoPhillips required that soil from each borehole be sampled on 10 foot intervals and be analyzed for concentrations of BTEX, (TPH), and chloride. ConocoPhillips did not conduct borehole soil sampling from 10 foot intervals as required. The OCD also noted that there were no sample analyses of heavily contaminated soils in the source areas obtained during the soil investigations showing actual BTEX, TPH and chloride source contaminant concentrations, other than SPLP composite samples. The lack of this information will make it difficult to assess remedial options for contamination at the site.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Clyde Yancey, Maxim Technologies, Inc.
Clay Cooper

Olson, William

From: Olson, William
Sent: Wednesday, May 07, 2003 1:28 PM
To: 'Goates, R. Neal'
Subject: RE: Reed Monitor Well Locations

Neal,

The 2 downgradient monitor wells appear too far from the source areas. Those 2 wells should be at the source areas. Also I need to get the report on the site investigations. I have the April 10, 2002 briefing document that you presented at our meeting last April, and I have record that we extended the deadline for submission of the report until June 3, 2002. However, I can't find any record that we got the investigation report. Could you please submit this report with the monitor well proposal.

If you have any questions please contact me.

Sincerely,

William C. Olson
Hydrologist
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3491

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

From: Goates, R. Neal [mailto:Neal.Goates@conocophillips.com]
Sent: Wednesday, May 07, 2003 7:42 AM
To: Bill Olson
Subject: FW: Reed Monitor Well Locations

What do you think regarding well placement for Reed A site?

*Neal Goates
RMWR Site Manager
ConocoPhillips
Threadneedle Office
PO Box 2197
Houston, TX 77252-2197
phone: 281-337-6427
ext: 679-6427
fax: 801-337-1674
cell: 281-465-4123
email: Neal.Goates@conocophillips.com*

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

From: Clyde Yancey [mailto:CYancey@maximusa.com]
Sent: Tuesday, May 06, 2003 2:52 PM
To: Goates, R. Neal
Subject: Reed Monitor Well Locations

What do you think?
<<Reed A WellFig Model (1).pdf>>

5/7/2003

Clyde L. Yancey, P.G.

Senior Vice President

Maxim Technologies, Inc.

10601 Lomas Blvd. NE, Suite 106

Albuquerque, NM 87112

(505) 237-8440 phone

(505) 237-8656 fax

cyancey@maximusa.com <mailto:cyancey@maximusa.com>

Olson, William

From: Goates, R. Neal [Neal.Goates@conocophillips.com]
Sent: Wednesday, May 07, 2003 7:42 AM
To: Bill Olson
Subject: FW: Reed Monitor Well Locations

What do you think regarding well placement for Reed A site?

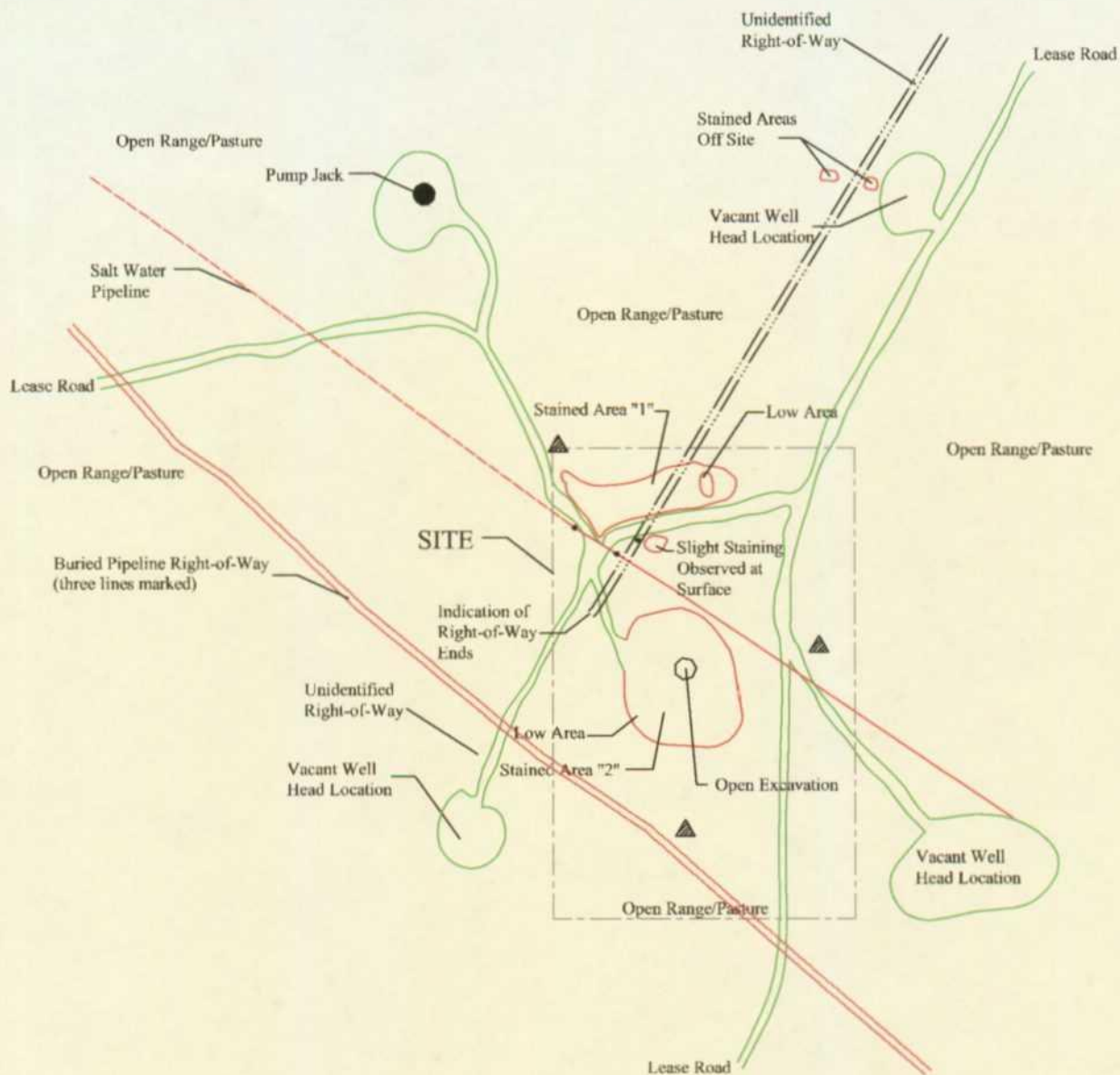
*Neal Goates
RM&R Site Manager
ConocoPhillips
Threadneedle Office
PO Box 2197
Houston, TX 77252-2197
phone: 832-379-6427
etn: 679-6427
fax: 801-382-1674
cell: 832-465-4123
email: Neal.Goates@conocophillips.com*

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

From: Clyde Yancey [mailto:CYancey@maximusa.com]
Sent: Tuesday, May 06, 2003 2:52 PM
To: Goates, R. Neal
Subject: Reed Monitor Well Locations

What do you think?
<<Reed A WellFig Model (1).pdf>>

Clyde L. Yancey, P.G.
Senior Vice President
Maxim Technologies, Inc.
10601 Lomas Blvd. NE, Suite 106
Albuquerque, NM 87112
(505) 237-8440 phone
(505) 237-8656 fax
cyancey@maximusa.com <<mailto:cyancey@maximusa.com>>



NOTES:

Target Property

• Pipeline Right-of-Way Marker

▲ Proposed Monitor Well

N

 Scale: 1 in. = approx. 300 ft.
 Locations Are Approximate

SOURCE: USGS Topographical Map - Monument South, NM

TARGET PROPERTY:

Former Tank Battery - Reed "A"

LEGAL DESCRIPTION

CITY/STATE/ZIP:

Lea County, New Mexico

LAT/LONG:

N32.55510/W103.31170

PROPOSED MONITOR
WELL LOCATIONS

MAXIM
TECHNOLOGIES INC.

Drawing: Reed A WellFig.DWG

FIGURE 1

Olson, William

From: Olson, William
Sent: Monday, May 13, 2002 3:15 PM
To: 'Tom Tangen'
Subject: RE: Reed A

Tom,

The below-referenced extension request is approved.

Sincerely,

William C. Olson
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3491

=====

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

From: Tom Tangen [mailto:TTangen@maximusa.com]
Sent: Thursday, May 09, 2002 11:01 AM
To: Bill Olson (wolson@state.nm.us)
Cc: Goates, R. Neal (Goates, R. Neal)
Subject: Reed A

Hello Bill,

The Reed A investigation report is undergoing more extensive review within Conoco than I anticipated when I first asked for the extension of the OCD delivery deadline. You granted a delivery date extension to May 13, 2002, and unfortunately, all necessary internal personnel have not yet had a chance to review the report. Therefore, I respectfully request that you extend the report due date to June 3, 2002. I apologize for the delay and thank you for your time and consideration.

Best Regards,

Tom Tangen
Maxim Technologies, Inc.
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
ph: 505.237.8440
fax: 505.237.8656
email: ttangen@maximusa.com

6/7/2002

Olson, William

From: Olson, William
Sent: Thursday, April 25, 2002 9:13 AM
To: 'Tom Tangen'
Cc: Johnson, Larry; Sheeley, Paul
Subject: RE: Reed A Site

Dear Mr. Tangen,

The below requested extension request is approved.

Sincerely,

William C. Olson
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3491

=====

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

From: Tom Tangen [mailto:TTangen@maximusa.com]
Sent: Thursday, April 25, 2002 7:19 AM
To: Bill Olson (wolson@state.nm.us)
Cc: Goates, R. Neal (Goates, R. Neal); Clyde Yancey
Subject: Reed A Site

Bill,

I am emailing to ask you to amend our discussion and email of some weeks ago regarding the Reed A report delivery due date to your office. I have nearly completed the report, but I am concerned that I have not allowed sufficient time for internal review and comment by Conoco. As you know, I agreed to deliver a copy of the report to your office by April 30, 2002. I request that you extend that due date by two weeks to May 13th, 2002. I apologize if this causes any problems. If you need to discuss this with me, please call 505 237 8440. I will be out of the office most of tomorrow, April 25th, but will be in the morning of April 26th. If this change is amenable to you, please reply via email, and I will hardcopy for the file.

Thank you,

Tom Tangen
Maxim Technologies, Inc.
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
ph: 505.237.8440
fax: 505.237.8656
email: ttangen@maximusa.com

4/25/2002

Olson, William

From: Tom Tangen [TTangen@maximusa.com]
Sent: Friday, March 08, 2002 11:41 AM
To: Bill Olson (wolson@state.nm.us)
Cc: Clyde Yancey; Goates, R. Neal (Goates, R. Neal)
Subject: Documentation of Phone Discussion on 3-8-02

On 3-8-02, Tom Tangen (Maxim) and Bill Olson (OCD) discussed a portion of the conditions forwarded in a letter from Bill Olson to John Skopak (Conoco) dated September 19 2001 (letter), and arrived at the following amendments:

- Maxim will install permanent monitoring wells per construction details discussed in the letter in any of the shallow borings that intersect the groundwater table, with the exception that 10 feet of well screen will be installed in the borings. Maxim will install the screen and complete the wells as warranted by field circumstances. Mr. Olson stipulated that a minimum of 2 feet of screen and sandpack should extend above the level of groundwater in the well;
- Maxim will sample at 5 foot intervals with a split spoon instead of 10 foot intervals;
- Investigation work at the site will commence on March 11, 2002;
- Maxim's report on the site investigation will be delivered to OCD by April 30, 2002.

Please contact me at the number below if you have any questions regarding this documentation,
Thanks,

Tom Tangen
Maxim Technologies, Inc.
10601 Lomas NE, Suite 106
Albuquerque, NM 87112
ph: 505.237.8440
fax: 505.237.8656
email: ttangen@maximusa.com

3/19/2002



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

September 19, 2001

Lori Wrotenbery

Director

Oil Conservation Division

CERTIFIED MAIL

RETURN RECEIPT NO. 5357-7928

Mr. John E. Skopak
Conoco, Inc.
600 North Dairy Ashford
Houston, Texas 77079-1175

**RE: REED "A" SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Skopak:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco, Inc.'s March 26, 2001 "SUBSURFACE INVESTIGATION – REED "A" SITE, SECTION 24, T20S, R36E, LEA COUNTY, NEW MEXICO" which was submitted on behalf of Conoco by their consultant Maxim Technologies, Inc. This document contains Conoco's work plan for investigation of the extent of soil and ground water contamination related to a crude oil tank battery at the Reed "A" site located in the SW/4, NW/4 of Section 24, Township 20 South, Range 36 East, Lea County, New Mexico.

The above referenced work plan is approved with the following conditions:

1. Soil from each boring shall be sampled on 10 foot intervals.
2. All soil samples shall be obtained and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), total petroleum hydrocarbons (TPH), and chloride using EPA approved methods and quality assurance/quality control (QA/QC).

Note: Field PID readings of less than 100 ppm may be substituted for a laboratory analysis of BTEX.

3. Conoco shall complete the new monitor wells as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.

Mr. John E. Skopak
September 19, 2001
Page 2

- b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
4. No less than 24 hours after the wells are developed, ground water from all monitor wells shall be purged, sampled and analyzed for concentrations of BTEX, polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and QA/QC.
5. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
6. Conoco shall submit the results of the investigation to the OCD by November 19, 2001. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office and shall include:
- a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log for each soil boring and monitor well.
 - c. A well completion diagram for each monitor well.
 - d. A site map showing the location of the tank battery, pits, spills, excavated areas, borings, monitor wells, and any other pertinent site features.
 - e. A water table map showing the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
 - f. Isopleth maps for contaminants observed during the investigations.

Mr. John E. Skopak
September 19, 2001
Page 3

- g. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
- h. The disposition of all wastes generated.

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

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Clyde Yancey, Maxim Technologies, Inc.
Clay Cooper