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**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

January 13, 1999

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-274-520-589**

Mr. Robert Foote  
Texaco Exploration and Production, Inc.  
P.O. Box 2100  
Denver, Colorado 80201

**RE: GROUND WATER INVESTIGATIONS  
TEXACO EUNICE NORTH GAS PLANT**

Dear Mr. Foote:

The New Mexico Oil Conservation Division (OCD) has reviewed Texaco Exploration and Production, Inc.'s (TEPI) December 17, 1998 "WORK PLAN FOR DELINEATION OF GROUNDWATER CONTAMINATE PLUME, TEXACO EXPLORATION AND PRODUCTION, INC., FORMER EUNICE #2 (NORTH) GAS PLANT, EUNICE, NEW MEXICO" which was submitted on behalf of TEPI by their consultant Highlander Environmental Corp. This document contains TEPI's work plan for additional investigation of the extent of ground water contamination at TEPI's Eunice North Gas Plant in Lea County, New Mexico.

The above referenced work plan is **approved**. Please be advised that OCD approval does not relieve TEPI of liability if the work plan fails to 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 TEPI of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Will Olson".

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Wayne Price, OCD Hobbs District Office  
Mark Larson, Highlander Environmental Corp.  
Robert Lord  
Bob Patterson, Rowland Trucking Co.

Z 274 520 589

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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

October 9, 1998

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-274-520-567**

Mr. Robert Foote  
Texaco Exploration and Production, Inc.  
P.O. Box 2100  
Denver, Colorado 80201

**RE: SOIL AND GROUND WATER INVESTIGATIONS  
TEXACO EUNICE NORTH GAS PLANT**

Dear Mr. Foote:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texaco Exploration and Production, Inc.'s (TEPI) July 14, 1998 "SUBMITTAL OF ADDITIONAL INFORMATION PERTAINING TO SOIL AND GROUNDWATER INVESTIGATION, FORMER TEXACO EXPLORATION AND PRODUCTION, INC., EUNICE #2 (NORTH) GAS PLANT, LEA COUNTY, NEW MEXICO" and January 30, 1998 "ADDENDUM FINAL INVESTIGATION REPORT, TEXACO EXPLORATION AND PRODUCTION, INC., EUNICE # 2 (NORTH) GAS PLANT, LEA COUNTY, NEW MEXICO, JANUARY 1998" which was submitted on behalf of TEPI by their consultant Highlander Environmental Corp. These documents contain the results of TEPI's investigation of the extent soil and ground water contamination at TEPI's Eunice North Gas Plant in Lea County, New Mexico.

The OCD has the following comments regarding the above referenced report:

- I. The extent of ground water contamination has not been completely defined in the following areas:
  - a. Shallow Zone Ground Water
    - i. The north and east limits of the benzene, toluene, ethylbenzene, toluene (BTEX) and lead contamination.
    - ii. The areal extent of chromium, chloride and total dissolved solids (TDS).
  - b. Deep Zone Ground Water
    - i. The northern extent of chromium.
    - ii. The north, south and eastern extent of chloride and TDS.

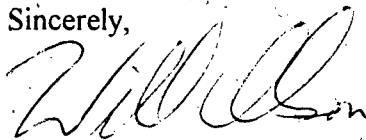
Mr. Robert Foote  
October 9, 1998  
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2. The chloride and TDS values for water well WW-1 on the July 14, 1998 chloride and TDS isopleth maps do not match the data presented in Table 6 of the January 30, 1998 report.
3. The July 14, 1998 chloride and TDS isopleth maps list data for monitor well MW-9. However, no data is listed for this well in Table 6 of the January 30, 1998 report.
4. The 13 mg/l chloride value observed in monitor well MW-8A does not seem to correlate with the high TDS seen this well. All other site monitor wells with high TDS also have high chloride concentrations. This well will need to be resampled during a future sampling event.
5. The laboratory detection limits for cadmium, lead and selenium listed in the January 30, 1998 report are higher than the New Mexico Water Quality Control Commission standards for these constituents. The monitor wells will need to be reanalyzed with lower detection limits during a future sampling event.

Based upon the OCD's review of these documents, the OCD requires that TEPI submit a work plan to complete the definition of the extent of contamination at the TEPI Eunice North Gas Plant. The work plan will be submitted to the OCD Santa Fe Office by December 11, 1998 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Wayne Price, OCD Hobbs District Office  
Mark Larson, Highlander Environmental Corp.  
Robert Lord  
Bob Patterson, Rowland Trucking Co.