

1R - 257

## **APPROVALS**

**YEAR(S):**

2004 - 2001

## Price, Wayne

---

**From:** Price, Wayne  
**Sent:** Friday, May 21, 2004 3:59 PM  
**To:** Scott Toner (E-mail)  
**Cc:** Mark Larson (E-mail)  
**Subject:** DF Fergason Project OCD case # 1R0257

Dear Mr. Toner:

The OCD is in receipt of the two closure reports for the Pipeline excavation area and the Tank Battery dated February 11, 2004 and February 12, 2004 respectfully and hereby approves of the closure reports and requires no further action on the DF Fergason Project OCD case # 1R0257.

Please be advised that NMOCD approval of this plan does not relieve (ChevronTexaco) 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 (ChevronTexaco) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price  
New Mexico Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, NM 87505  
505-476-3487  
fax: 505-476-3462  
E-mail: WPRICE@state.nm.us

## Price, Wayne

---

**From:** Price, Wayne  
**Sent:** Tuesday, October 21, 2003 1:55 PM  
**To:** 'Mark Larson'; Price, Wayne  
**Cc:** Toner, Scott L (SToner)  
**Subject:** RE: Remediation Summary and Proposed Pipeline Excavation Work Plan, D.F. Fergason Lease, U.L. H, Section 30, Township 18 South, Range 39 East, Lea County, NM

OCD Hereby approves of the work plan with the following condition:

Please collect samples of the areas that the TPH of the soil remains i.e. 2000 mg/kg and run an SPLP test to make sure that the BTEX is within OCD groundwater limits.

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

**From:** Mark Larson [mailto:mark@laenvironmental.com]  
**Sent:** Friday, October 17, 2003 8:33 AM  
**To:** Price, Wayne  
**Cc:** Toner, Scott L (SToner)  
**Subject:** Re: Remediation Summary and Proposed Pipeline Excavation Work Plan, D.F. Fergason Lease, U.L. H, Section 30, Township 18 South, Range 39 East, Lea County, NM

Dear Mr. Price:

On October 16, 2003, the above-referenced report was faxed to your attention. ChevronTexaco is nearing completion of closing the emergency pit excavation at the D.F. Fergason Lease, and would like to complete work along the pipeline right-of-way located east of the excavation. The document contains the scope of work for the project, and it would greatly benefit ChevronTexaco to complete the work while equipment and access is available. Your approval of the work plan would be greatly appreciated.  
Sincerely,

Mark J. Larson  
Larson and Associates, Inc.  
507 N. Marienfeld Street, Suite 202  
Midland, Texas 79701  
(432) 687-0901 (office)  
(432) 687-0456 (fax)  
(432) 556-8656 (mobile)  
mark@LAenvironmental.com

**FAX**

**DATE:** October 16, 2003

**TO:** Wayne Price

**WITH:** New Mexico Oil Conservation Division  
Santa Fe, New Mexico

**FAX:** (505) 476-3462

**FROM:** Mark J. Larson

**WITH:** Larson and Associates, Inc.

**cc:**

**PAGES (with cover):** 13

**Re:** Remediation Summary and Proposed Pipeline Excavation Work Plan,  
D.F. Ferguson Lease, U.L. H, Section 30, Township 18 South, Range  
39 East, Lea County, New Mexico

---

Wayne: Please find attached report and work plan for the excavation in the pipeline are  
at the above-referenced lease. The original report will be mailed today. Please call or  
email if you have questions.

Mark Larson

**Larson and Associates, Inc.  
507 N. Marienfeld Street  
Suite 202  
Midland, Texas 79701  
(432) 687-0901 (office)  
(432) 687-0456 (fax)  
mark@LAenvironmental.com**

**Please call (432) 687-0901 if this transmittal is not legible**

October 15, 2003

VIA FACSIMILE: (505) 476-3462

Mr. Wayne Price  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Remediation Summary and Proposed Pipeline Excavation Work Plan, D. F. Fergason Lease, U. L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County New Mexico

Dear Mr. Price:

ChevronTexaco Exploration and Production, Inc. (Chevron Texaco), as successor to Texaco Exploration and Production, Inc. (Texaco), retained Larson and Associates, Inc. (LA) to supervise remediation of an emergency pit once associated with the D.F. Fergason Lease located in unit letter H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico. Remediation of the emergency pit was conducted between April 14, 2003 and June 26, 2003. On August 28, 2003, the New Mexico Oil Conservation Division (NMOCD) granted ChevronTexaco permission to fill the emergency pit excavation to the west edge of a pipeline right-of-way located near the east side of the excavation. The crude oil pipeline is owned by Navajo Pipeline (Navajo), and was temporarily relocated at the expense of ChevronTexaco to facilitate excavation of a portion of the emergency pit that extended into the pipeline right-of-way. Figure 1 presents a location and topographic map. Figure 2 presents a site drawing.

Soil samples were collected from the emergency pit excavation near the west edge of the pipeline right-of-way to assess the vertical extent of impact from the pit. Samples SS-97 and SS-98 were collected from the bottom of the excavation from about 20 and 22 feet below ground surface (bgs), respectively. Environmental Lab of Texas, Inc. (ELTI) received the samples under proper preservation and chain-of-custody, which were analyzed for benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX) using method SW-846-8021B, total petroleum hydrocarbons (TPH) for gasoline range organics (GRO) and diesel range organics (DRO) using method SW-846-8015, and chloride using method SW-846-9253. The laboratory reported no BTEX or TPH above the method detection limits (concluding that impact did not extend to 20 feet bgs). The chloride concentration in samples SS-97 and SS-98 was 195 milligrams per kilogram (mg/kg) and 70.9 mg/kg, respectively. The laboratory results conclude that impact from the emergency pit did not extend to 20 feet bgs near the pipeline right-of-way.

Between June 23, 2003 and June 26, 2003, the emergency pit was excavated into the pipeline right-of-way. Soil samples were collected daily as the excavation progressed, and were analyzed for TPH and chloride, using the above-described methods. Duplicate samples were periodically collected and analyzed for TPH using field instrumentation. Figures 3 through 6 present detailed drawings of the excavation for June 23, 2003 through June 26, 2003, respectively. The drawings present the excavation boundary and TPH concentration from soil samples. Table 1 presents a summary of the field and laboratory analysis. The laboratory reports

Mr. Wayne Price  
October 14, 2003  
Page 2

for samples SS-97, SS-98, SS-100 through SS-151 were included in the emergency pit closure report dated August 28, 2003 ("Preliminary Report and Closure Request for Emergency Pit Excavation, D.F. Ferguson Lease, U.L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico"). Appendix A presents the laboratory report for samples SS-152 through SS-164.

On June 23, 2003, the pipeline excavation measured approximately 30' x 36', and extended to about 8 feet bgs. Soil samples exhibited TPH concentrations from 28.3 mg/kg (SS-100) to 4810 mg/kg (SS-103). On June 24, 2003, the excavation measured approximately 40' x 45', and extended to about 10 to 13 feet bgs. Soil samples exhibited TPH concentrations from 1802 mg/kg (SS-106) to 15,961 mg/kg (SS-110). On June 25, 2003, the excavation measured approximately 55' x 45', and extended to about 17 to 18 feet bgs. The TPH concentrations ranged from less than the method detection limit (<10 mg/kg) in sample SS-147 to 2949 mg/kg (SS-150). On June 26, 2003, the excavation measured approximately 65' x 45', and extended to about 15 to 20 feet bgs. Soil samples contained TPH concentrations from less than the method detection limit (<10 mg/kg) in samples SS-153 (15'), SS-155 (15') and SS-156 (15') to 2845 mg/kg in sample SS-158 (15'). Sample SS-158 was collected from the south side of the excavation where hydrocarbon staining appeared to originate from a point south of the excavation (concluding that the source for the TPH is not the emergency pit).

ChevronTexaco claims no responsibility for historical impacts at this location that are not associated with the emergency pit, but it proposed to cooperate with the NMOCD to reduce the TPH to a reasonable concentration (2000 mg/kg). ChevronTexaco proposes to remove additional soil from the south end of this excavation. The additional excavation work will not exceed the current width (approximately 65 feet) and depth (approximately 20 feet) of the south end of the excavation, and will not be extended more than 20 feet past the current location. The new excavation work will be terminated when these limits have been reached, or the TPH concentration in soil samples reaches the proposed level of 2000 mg/kg, whichever occurs first. Soil samples will be collected from the sides and bottom of the new excavation to show that the soil has been remediated to 2000 mg/kg, or to document the level of TPH still in place if the limits of the proposed additional excavation are reached. A qualified laboratory will analyze the samples for BTEX, TPH and chloride using EPA approved methods. The excavation will be filled with clean soil, and crowned slightly to facilitate runoff. A final report will be submitted to the NMOCD upon completion of the work, and receipt of the laboratory analysis. Please call Mr. Scott Toner with ChevronTexaco at (432) 687-7318 or myself at (432) 687-0901, you can contact us by email at [stoner@chevrontexcaco.com](mailto:stoner@chevrontexcaco.com) or [mark@LAcnvironmental.com](mailto:mark@LAcnvironmental.com).

Sincerely,

Larson and Associates, Inc.



Mark J. Larson, CPG, CGWP  
President  
Encl.

cc: Scott Toner - ChevronTexaco  
Paul Sheeley - NMOCD District I

## Tables

507 North Marienfeld, Suite 202 ♦ Midland, Texas 79701 ♦ Ph. (915) 687-0901 ♦ Fax (915) 687-0456

0004/013

10/16/2003 THU 14:30 FAX 915 687 0456 LARSON & ASSOCIATES INC.

**Table 1**  
**Summary of TPH and Chloride Analysis of Soil Samples from Pipeline Excavation**  
**D.F. Ferguson Lease**  
**U. L. H(SE/4, NE/4), Section 30, Township 18 South, Range 39 East**  
**Lea County, New Mexico**

Sample Number	Sample Location	Sample Date	Sample Depth (feet BGS)	Field TPH (mg/kg)	GRO C6-C12 mg/kg	DRO >C12-C35 mg/kg	TPH C6-C35 mg/kg	Chloride mg/kg
S-97	E Bottom Pit	05-Jun-03	20	---	<0.025	<0.125	<10.0	<10.0
S-98	E Bottom Pit	05-Jun-03	22	---	<0.025	<0.125	<10.0	<10.0
S-99	Pit In Pit	20-Jun-03	--	15.0	--	--	<10.0	40.4
S-100	Pit @ Pipeline	23-Jun-03	8	0.4	---	--	<10.0	28.3
S-101	Pit @ Pipeline	23-Jun-03	8	26.6	---	---	36.6	2150
S-102	Pit @ Pipeline	23-Jun-03	8	2.2	---	---	<10.0	35.8
S-103	Pit @ Pipeline	23-Jun-03	8	600	---	---	310	4500
S-104	Pit @ Pipeline	23-Jun-03	8	--	---	---	13.6	3570
S-105	Pit @ Pipeline	23-Jun-03	8	66.8	18.1	165	183	<20.0
S-106	Pit @ Pipeline	24-Jun-03	13	145	262	1540	1802	--
S-107	Pit @ Pipeline	24-Jun-03	13	548	482	2240	2722	---
S-108	Pit @ Pipeline	24-Jun-03	13	550	674	2450	3124	---
S-109	Pit @ Pipeline	24-Jun-03	10	308	289	2560	2849	---
S-110	Pit @ Pipeline	24-Jun-03	10	103	561	15400	15961	---
S-147	East End	24-Jun-03	18	114	<10.0	<10.0	<20.0	195
S-148	East End	24-Jun-03	18	175	11.0	159	170	286
S-149	East End	24-Jun-03	18	1466	382	1300	1682	158
S-150	East End	24-Jun-03	17	1703	729	2220	2949	236

**Notes:**

1. BGS: Laboratory analyses performed by Environmental Lab of Texas, Inc.
2. GRO: Depth in feet below ground surface
3. DRO: Gasoline-range organics by method SW-846-8015
4. TPH: Diesel-range organics by method SW-846-8015
5. mg/kg: Total petroleum hydrocarbons (Sum of GRO + DRO)
6. ---: Milligrams per kilogram
7. <: No data available



Sample Number	Sample Location	Sample Date	Sample Depth (feet BGS)	Field TPH (mg/kg)	GRO C6-C12 mg/kg	DRO >C12-C35 mg/kg	TPH C6-C35 mg/kg	Chloride mg/kg
S-152	North Side	28-Jun-03	15	--	23.9	402	425.9	<20.0
S-153	North Side	28-Jun-03	15	--	<10.0	<10.0	<20.0	<20.0
S-154	East End	28-Jun-03	15	--	13.6	441	454.6	<20.0
S-155	East End	28-Jun-03	15	--	<10.0	<10.0	<20.0	<20.0
S-156	South Side	28-Jun-03	15	--	<10.0	<10.0	<20.0	248
S-157	South Side	28-Jun-03	15	--	85.0	559	644	53.2
S-158	South Side (Stain)	28-Jun-03	18	--	645	2200	2845	108
S-159	West End	28-Jun-03	22	--	50.3	416	486.3	195
S-160	West End	28-Jun-03	20	--	29.7	288	297.7	<20.0
S-161	West End	28-Jun-03	20	--	437	1500	1937	142
S-162	East End	28-Jun-03	17	--	<10.0	36.5	36.5	195
S-163	East End	28-Jun-03	17	--	268	1350	1616	53.2
S-164	East End	28-Jun-03	17	--	<10.0	45.8	45.8	53.2

## Notes:

Laboratory analyses performed by Environmental Lab of Texas, Inc.

Depth in feet below ground surface

Gasoline-range organics by method SW-846-8015

Diesel-range organics by method SW-846-8015

Total petroleum hydrocarbons (Sum of GRO + DRO)

Milligrams per kilogram

No data available

Less than method detectic

1. BGS:

2. GRO:

3. DRO:

4. TPH:

5. mg/kg

6. ---:

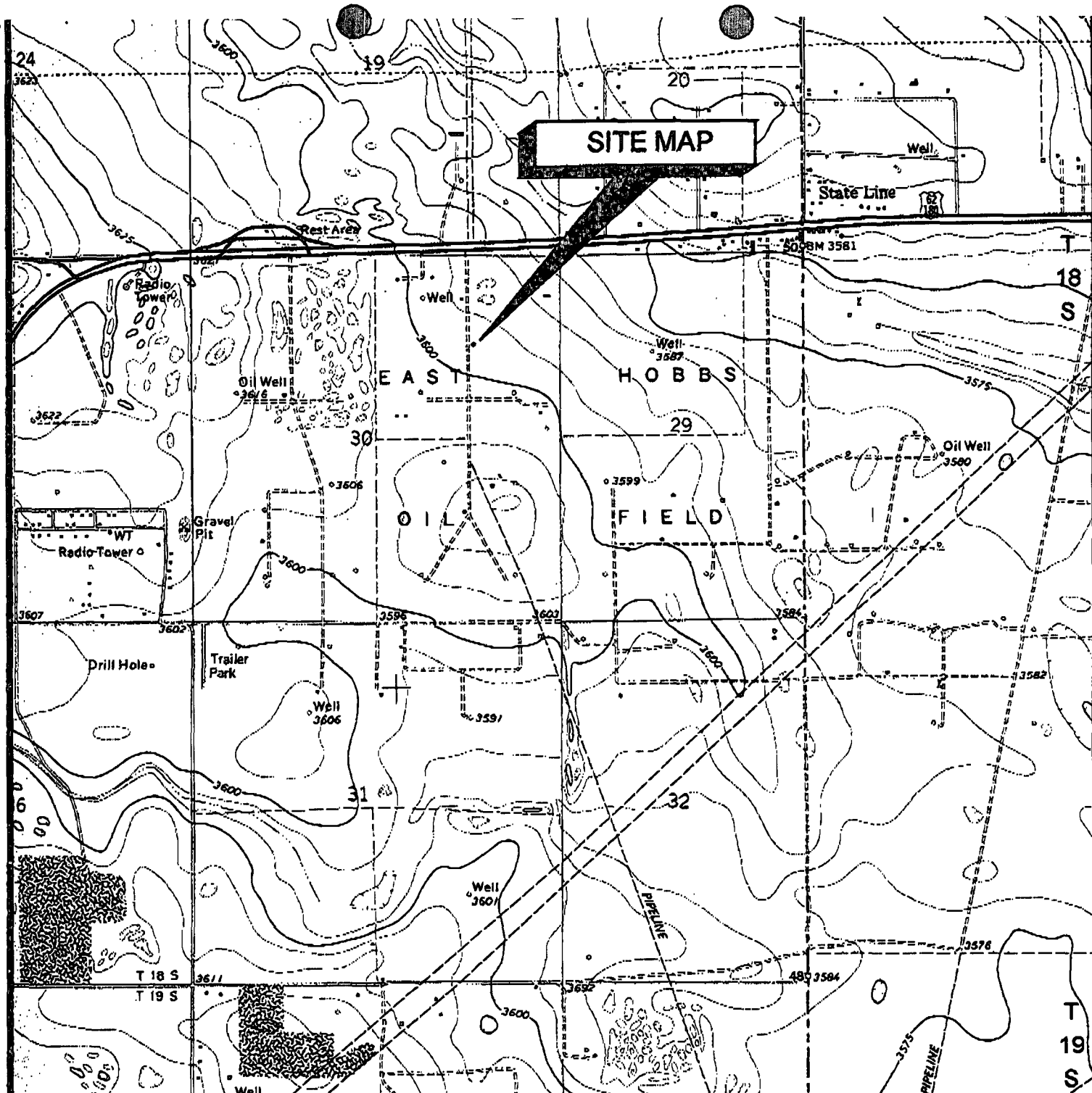
7. &lt;:

## Figures

507 North Marienfeld, Suite 202 ♦ Midland, Texas 79701 ♦ Ph. (915) 687-0901 ♦ Fax (915) 687-0456

10/16/2003 THU 14:31 FAX 915 687 0456 LARSON & ASSOCIATES INC.

10/16/2003 THU 14:31 FAX 915 687 0456 LARSON & ASSOCIATES INC.



# **SITE MAP**

State Line

Well

500 BM 3581

T  
18  
S

EAST

HOBBS

OIL FIELD

Oil Well 3580

Radio Tower

Gravel Pit

Drill Hole

Trailer Park

Well 3606

Well 3607

T 18 S

T 19 S

R-38-E

R-39-E

T  
19  
S

FIGURE #1

LEA COUNTY, NEW MEXICO

**CHEVRONTEXACO INC.**

D.F. FERGASON

SE/4, NE/4, SEC. 30, T18S, R39E

TOPOGRAPHIC MAP

**Larson & Associates, Inc.**  
Environmental Consultants

DATE 4/11/01

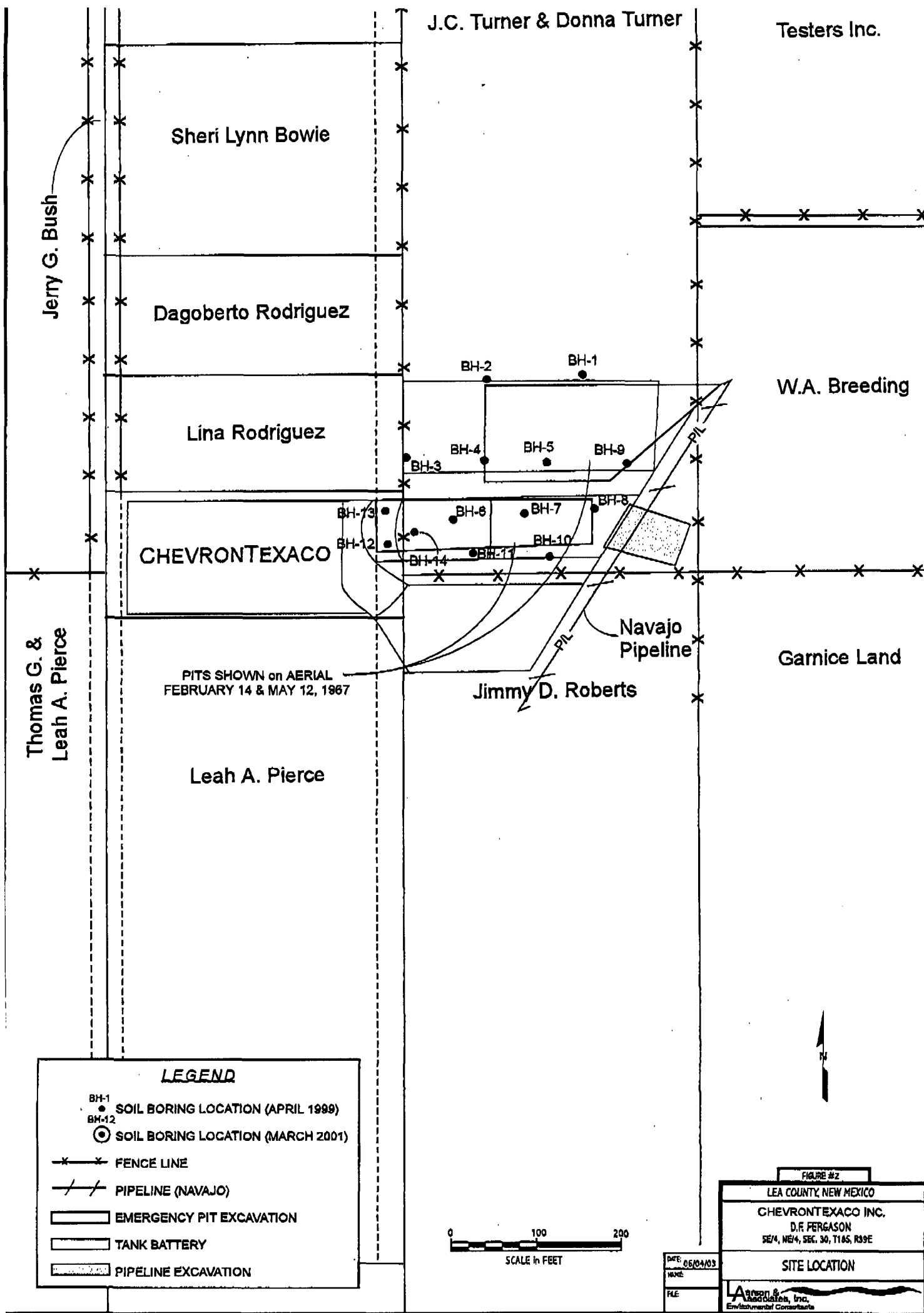
WMC

FILE

TAKEN FROM U.S.G.S.  
HOBBS EAST, TEX.-N. MEX. 1989  
7.5 QUADRANGLES



SCALE: 1"=2000'



APPROXIMATE  
LOCATION OF  
NAVAJO PIPELINE

3584 (8')  
SS-104

28.3 (8')  
SS-100

2187 (8')  
SS-101

4810 (8')  
SS-103

<10 (20')  
SS-97

<10 (22')  
SS-98

35.8 (8')  
SS-102

183 (8')  
SS-105

EMERGENCY PIT EXCAVATION  
(APPROXIMATE)

NAVAJO PIPELINE  
RIGHT-OF-WAY

FIGURE #3

LEA COUNTY, NEW MEXICO

CHEVRONTExACO, INC.  
PIPELINE EXCAVATION

SE/4, NE/4, SEC. 30, T18S, R39E

SOIL SAMPLE LOCATION and  
TPH ANALYSIS 6/23/03

Larson & Associates, Inc.  
Environmental Consultants

DATE	08/01/03
NAME	NMC
FILE	

SCALE as SHOWN

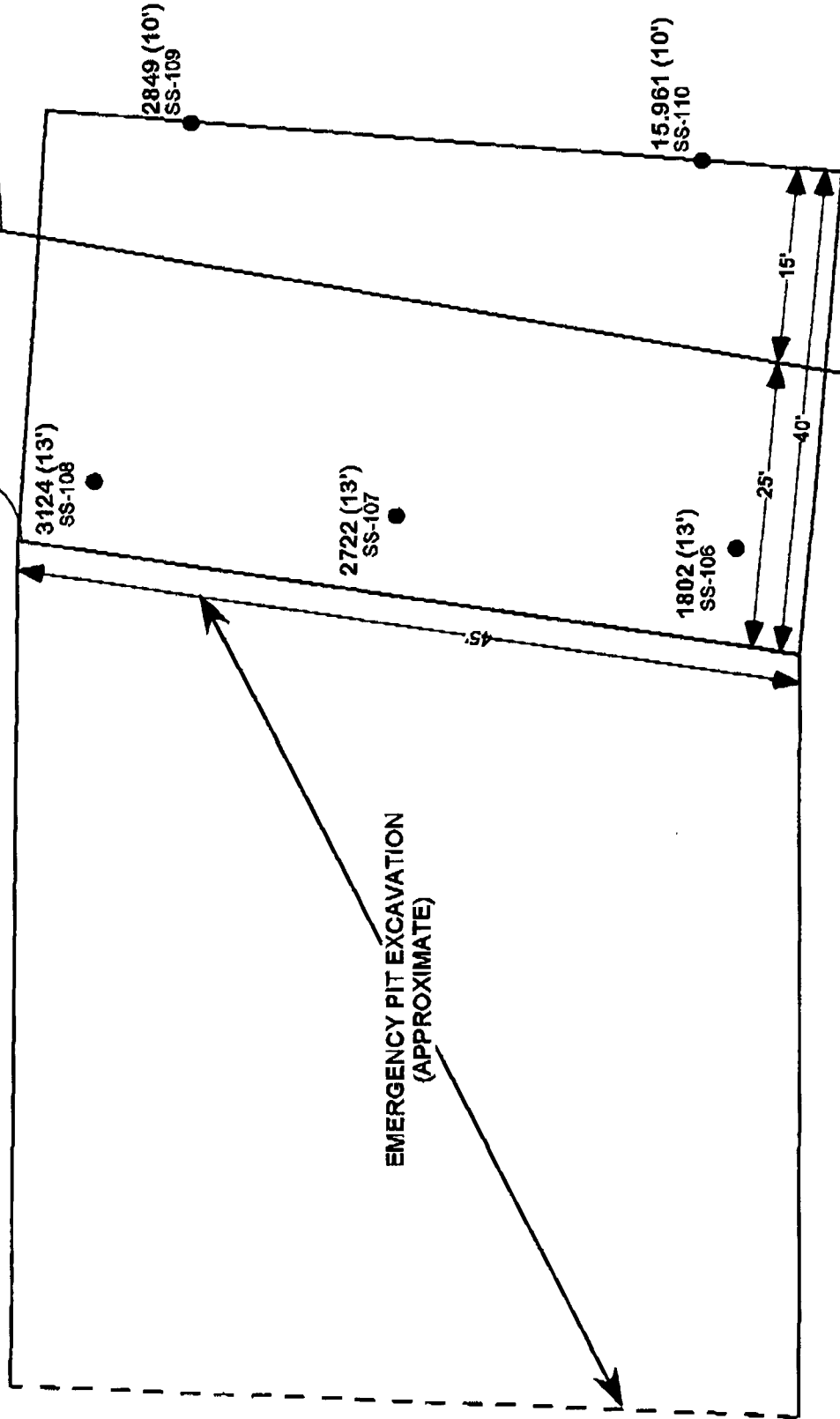
**LEGEND**

2187 (8')  
SS-101

SOIL SAMPLE LOCATION and  
TPH CONCENTRATION (Mg/Kg)  
at SPECIFIED DEPTH, FEET BGS,  
6/23/03

NAVAJO PIPELINE  
RIGHT-OF-WAY

APPROXIMATE  
LOCATION OF  
NAVAJO PIPELINE



EMERGENCY PIT EXCAVATION  
(APPROXIMATE)

**LEGEND**

- 1802 (13')  
SS-106
- SOIL SAMPLE LOCATION and  
TPH CONCENTRATION (Mg/Kg)  
at SPECIFIED DEPTH, FEET BGS,  
6/24/03

FIGURE #4

LEA COUNTY, NEW MEXICO

**CHEVRONTTEXACO, INC.**

PIPELINE EXCAVATION

SE/4, NE/4, SEC. 30, T18S, R39E

SOIL SAMPLE LOCATIONS and  
TPH ANALYSIS 6/24/03

DATE: 08/01/03  
NAME:  
FILE:

**LARSON & ASSOCIATES, Inc.**  
Environmental Consultants

SCALE as SHOWN

APPROXIMATE  
LOCATION OF  
NAVAJO PIPELINE

NAVAJO PIPELINE  
RIGHT-OF-WAY

EMERGENCY PIT EXCAVATION  
(APPROXIMATE)

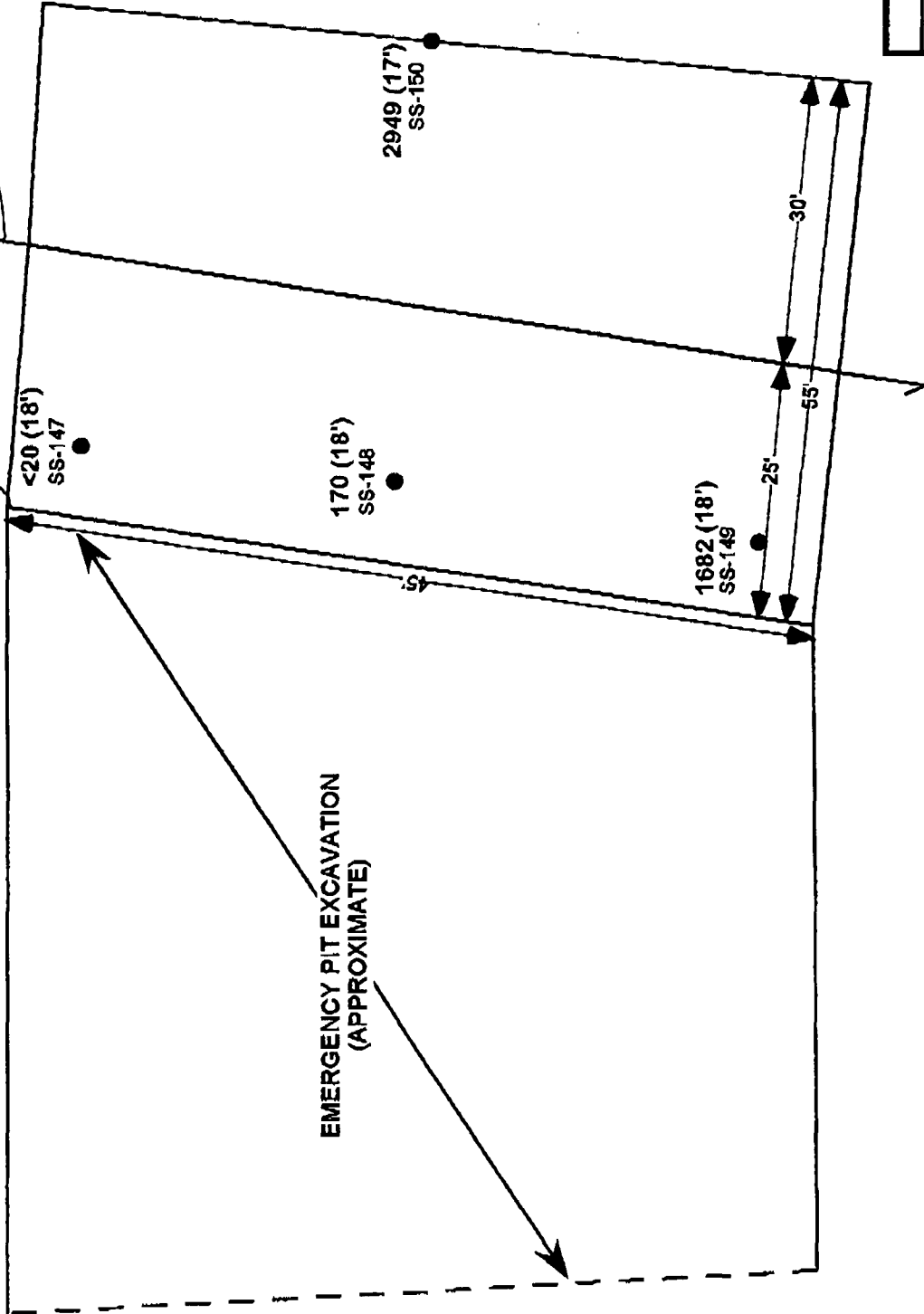


FIGURE #5

LEA COUNTY, NEW MEXICO

CHEVRON TEXACO, INC.

PIPELINE EXCAVATION

SE/4, NE/4, SEC. 30, T18S, R39E

SOIL SAMPLE LOCATIONS and  
TPH ANALYSIS 6/25/03

DATE:	08/01/03
NINE	
FILE	

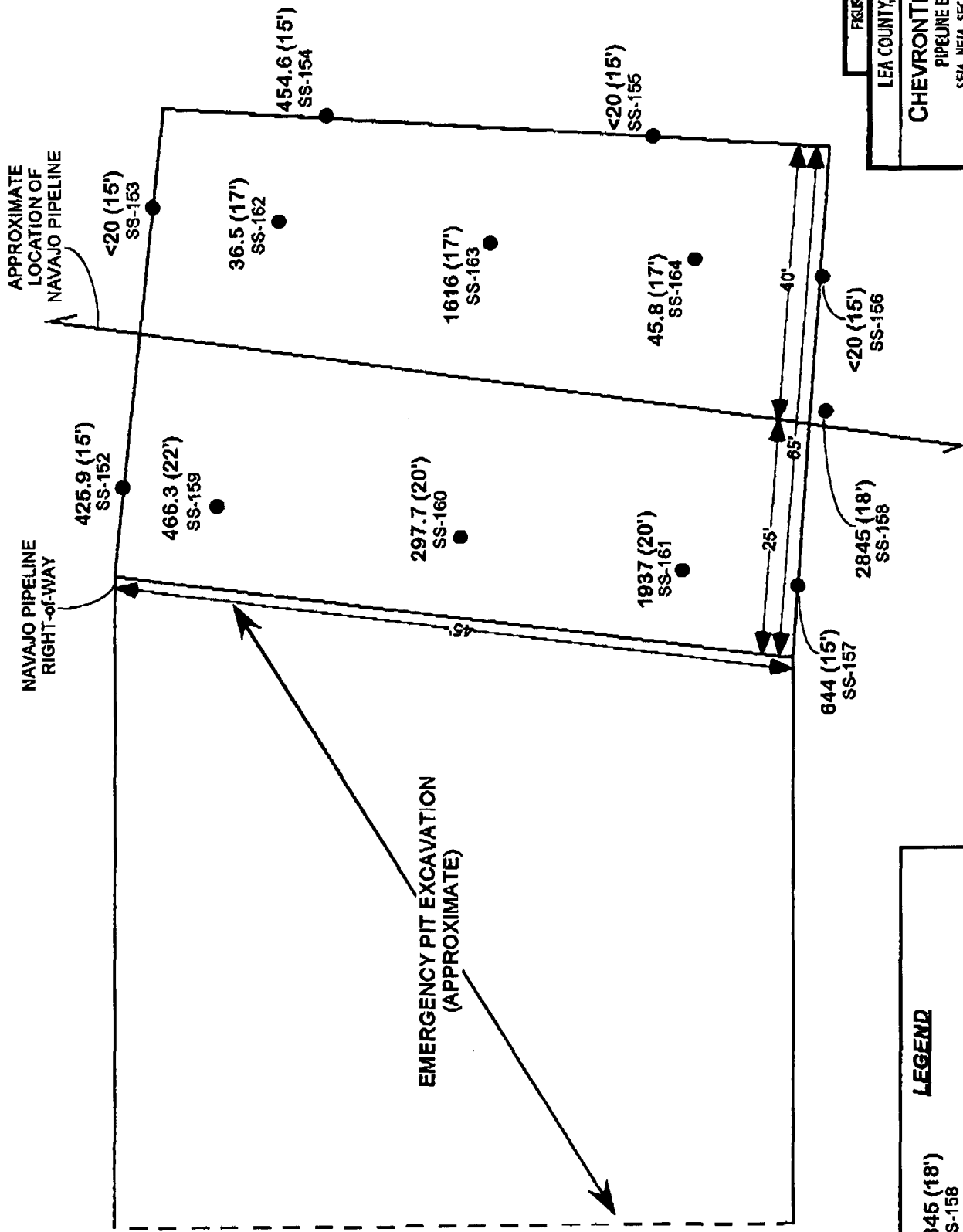
Larson & Associates, Inc.  
Environmental Consultants

SCALE as SHOWN

**LEGEND**

1682 (18')  
SS-149

SOIL SAMPLE LOCATION and  
TPH CONCENTRATION (Mg/Kg)  
at SPECIFIED DEPTH, FEET BGS,  
6/25/03





# TRANSACTION REPORT

P. 01

OCT-16-2003 THU 01:30 PM

FOR:

RECEIVE

DATE	START	SENDER	RX TIME	PAGES	TYPE	NOTE	M#	DP
OCT-16	01:29 PM	915 687 0456	1'54"	13	RECEIVE	OK		

## Price, Wayne

---

**From:** Price, Wayne  
**Sent:** Tuesday, October 21, 2003 1:35 PM  
**To:** 'Mark Larson'; Price, Wayne  
**Cc:** Toner, Scott L (SToner)  
**Subject:** RE: Remediation Report and Request for Closure, D.F. Fergason Tank Battery, U.L. H, Section 30, Township 18 South, Range 39 East, Lea County, NM

OCD hereby approves the work plan to close this site with the following condition:

Collect soil sample(s) below the area where the tank set. This is in area where sample # SS-125 was taken. I would recommend that you collect a sample three feet below this area and run a SPLP for chlorides, or collect enough samples below this point to show a definite decreasing trend.

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

From: Mark Larson [mailto:mark@laenvironmental.com]  
Sent: Friday, October 17, 2003 8:14 AM  
To: Price, Wayne  
Cc: Toner, Scott L (SToner)  
Subject: Re: Remediation Report and Request for Closure, D.F. Fergason Tank Battery, U.L. H, Section 30, Township 18 South, Range 39 East, Lea County, NM

Dear Mr. Price:

On October 16, 2003, the above-referenced report was faxed to your attention. ChevronTexaco is nearing completion of closing the emergency pit excavation at the D.F. Fergason Lease, and would like to close the former tank battery location while equipment and access is available. The document contains a request to close the tank battery, and your consideration of the request would be greatly appreciated.

Sincerely,

Mark J. Larson  
Larson and Associates, Inc.  
507 N. Marienfeld Street, Suite 202  
Midland, Texas 79701  
(432) 687-0901 (office)  
(432) 687-0456 (fax)  
(432) 556-8656 (mobile)  
mark@LAenvironmental.com

**FAX**

**DATE:** October 16, 2003

**TO:** Wayne Price

**WITH:** New Mexico Oil Conservation Division  
Santa Fe, New Mexico

**FAX:** (505) 476-3462

**FROM:** Mark J. Larson

**WITH:** Larson and Associates, Inc.

**cc:**

**PAGES (with cover):** 11

**Re:** Closure Request for D.F. Fergason Tank Battery, U.L. H, Section 30,  
Township 18 South, Range 39 East, Lea County, New Mexico

---

Wayne: Please find attached report and closure request for the tank battery at the above-referenced lease. The original report will be mailed today. Please call or email if you have questions.

Mark Larson

**Larson and Associates, Inc.  
507 N. Marienfeld Street  
Suite 202  
Midland, Texas 79701  
(432) 687-0901 (office)  
(432) 687-0456 (fax)  
mark@LAcnvironmental.com**

**Please call (432) 687-0901 if this transmittal is not legible**

October 14, 2003

**VIA FACSIMILE: (505) 476-3462**

Mr. Wayne Price  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Remediation Report and Request for Closure of the D. F. Fergason Tank Battery,  
U. L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County  
New Mexico**

Dear Mr. Price:

ChevronTexaco Exploration and Production (Chevron Texaco), as successor to Texaco Exploration and Production, Inc. (Texaco), retained Larson & Associates, Inc. (LA) to supervise remediation of a tank battery (Site) located at the D. F. Fergason Lease in unit letter H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico. Remediation of the tank battery occurred in conjunction with remediation of an emergency pit that was located east of the tank battery. Figure 1 presents a location and topographic map. Figure 2 presents a drawing of the Site.

CrownQuest Operating, LLC (CrownQuest) operated the tank battery until about April 2003 when the Site was abandoned, and equipment was removed. ChevronTexaco acquired the Site in May 2003 to facilitate remediation of the emergency pit. Approximately two (2) feet of soil was removed from the surface of the tank battery, and hauled to the ChevronTexaco centralized waste management facility (NM-02-0012) located in Section 17, Township 24 South, Range 36 East, Lea County, New Mexico. Further excavation of the east side of the tank battery occurred during excavation of the emergency pit, and the area was excavated from ten (10) to approximately twenty-five (25) feet below ground surface (bgs). Environmental Lab of Texas, Inc. (ELTI) located in Odessa, Texas, analyzed soil samples 1 through 7 that were collected from the sloped area. The samples were analyzed for benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX) using method SW-846-8021B, total petroleum hydrocarbons (TPH) for gasoline range organics (GRO) and diesel range organics (DRO) using method SW-846-8015, and chloride using method SW-846-9253. The laboratory reported no concentrations of benzene, total BTEX or TPH above the test method detection limits. Chloride ranged from less than 20 milligrams per kilogram (<20.0 mg/kg) in sample 5 to 230 mg/kg in sample 1. The analysis was included in the closure report for the emergency pit dated August 28, 2003 ("*Preliminary Report and Closure Request for Emergency Pit Excavation, D.F. Fergason Lease, U.L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico*").

On June 23, 2003, soil samples were collected from the Site. Thirty-five (35) samples (111 through 146) were collected about every twenty-five (25) feet using a stainless steel sample trowel. The samples were placed in clean glass sample jars, labeled, chilled in an ice chest, delivered under chain-of-custody control to ELTI, and analyzed for BTEX, TPH (GRO and DRO), and chloride using methods described earlier. A duplicate of samples 119, 125, 132, 133,

136 and 137 was collected for headspace analysis using the ambient temperature headspace (ATH) method. The ATH method is a qualitative analysis that requires filling a sample jar approximately ¾ full with soil, sealing the top of the container with a layer of aluminum foil, replacing the lid, and using a photoionization detector (PID) to measure the concentration of ionizable hydrocarbons in the vacant headspace. The PID was passed through the aluminum foil after the sample had reached ambient temperature (approximately 15 to 30 minutes). The PID displayed the concentration of ionizable hydrocarbon in the headspace sample in parts per million (ppm). The PID readings ranged from 0.8 ppm (samples 136 and 137) to 50.0 ppm (sample 119). Table 1 presents a summary of the field and laboratory analysis. Figure 3 presents a detailed drawing of the Site. Laboratory reports for the analysis were included as an attachment to the dated August 28, 2003.

Referring to Table 1, benzene was not detected in any sample above the test method detection limit of 0.025 mg/kg. Total BTEX was only reported in samples 119 and 123 at 0.047 mg/kg and 0.053 mg/kg, respectively. The benzene and total BTEX concentrations are well below the New Mexico Oil Conservation Division (NMOCD) Recommended Remediation Action Level (RRAL) of 10 mg/kg and 50 mg/kg, respectively. Concentrations of TPH were generally less than 1,000 mg/kg, except in samples 113 (5,328 mg/kg), 126 (1,130 mg/kg), 131 (1,720 mg/kg) and 132 (1,090 mg/kg). Chloride was highest in sample 125, which reported a concentration 993 mg/kg. The concentration of chloride in soil samples collected from the sloped area near the east side of the Site did not report a concentration greater than 177 mg/kg (4) demonstrating that chloride decreased significantly with depth. The TPH in the samples from the sloped area also demonstrates decreasing concentrations with depth. No TPH was reported above the test method detection limit of 10 mg/kg in the samples from the sloped area. Depth-to-groundwater at the Site occurs at approximately 93 feet bgs, and an analysis of a groundwater sample collected by the NMOCD from a well located immediately north of the Site has demonstrated that groundwater has not been impacted. Based on the laboratory analysis and demonstrations, ChevronTexaco requests that the NMOCD grant closure of the tank battery without any further remediation. The excavated area will be filled with clean soil to the existing grade. Please call Mr. Scott Toner with ChevronTexaco at (432) 687-7318, you or myself at (432) 687-0901, may email [stoner@chevrontexcaco.com](mailto:stoner@chevrontexcaco.com) or [mark@Laenvironmental.com](mailto:mark@Laenvironmental.com).

Sincerely,

*Larson and Associates, Inc.*



Mark J. Larson, CPG, CGWP  
President

Encl.

cc: Scott Toner - ChevronTexaco  
Paul Sheeley - NMOCD District I

## Tables

507 North Marienfeld, Suite 202 ♦ Midland, Texas 79701 ♦ Ph. (915) 687-0901 ♦ Fax (915) 687-0456

10/16/2003 THU 10:55 FAX 915 687 0456 LARSON & ASSOCIATES INC.

0004/011

Table 1  
Summary of Laboratory Analysis of Soil Samples

D.F. Ferguson Tank Battery

Unit Letter H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East

Lea County, New Mexico

Page 1 of 2

Sample Number	Sample Location	Sample Date	Sample Depth (Feet BGS)	PID (ppm)	Benzene (mg/kg)	BTEX (mg/kg)	GRO C6 - C12 (mg/kg)	DRO C12 - C35 (mg/kg)	TPH C6 - C35 (mg/kg)	Chloride mg/kg
S-111	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	47.3	47.3	177
S-112	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	34.7	34.7	<20.0
S-113	West TB	24-Jun-03	2	--	<0.025	<0.125	<50.0	1130	1130	<20.0
S-114	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	285	285	<20.0
S-115	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	224	224	<20.0
S-116	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
S-117	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
S-118	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	<10.0	<20.0	53.2
S-119	West TB	24-Jun-03	2	50.0	<0.025	0.047	<10.0	288	288	142
S-120	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	158	158	<20.0
S-121	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	85.0	85.0	<20.0
S-122	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	90.0	90.0	<20.0
S-123	West TB	24-Jun-03	2	--	<0.025	0.053	<10.0	90.8	90.8	106
S-124	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	42.5	42.5	35.4
S-125	West TB	24-Jun-03	2	41.0	<0.025	<0.125	<10.0	239	239	993
S-126	West TB	24-Jun-03	2	--	<0.025	<0.125	88.3	5240	5328	248
S-127	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	445	445	177
S-128	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	286	286	106
S-129	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	39.2	39.2	35.4
S-130	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	27.4	27.4	230
S-131	West TB	24-Jun-03	2	--	<0.025	<0.125	<10.0	1720	1720	284
S-132	West TB	24-Jun-03	2	21.0	<0.025	<0.125	<10.0	1090	1090	390
S-133	West TB	24-Jun-03	2	21.0	<0.025	<0.125	<10.0	300	300	284

Notes: Laboratory analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas

1. BGS: Denotes sample depth in feet below ground surface

2. ppm: Field headspace reading in parts per million using a photoionization detector

3. mg/kg: Milligrams per kilogram

4. --: No data available

5. <: Less than test method detection limit

Table 1

## Summary of Laboratory Analysis of Soil Samples

D.F. Fergason Tank Battery

Unit Letter H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East

Lea County, New Mexico

Page 2 of 2

Sample Number	Sample Location	Sample Date	Sample Depth (Feet BGS)	PID (ppm)	Benzene (mg/kg)	BTEX (mg/kg)	GRO C6 - C12 (mg/kg)	DRO C12 - C35 (mg/kg)	TPH C6 - C35 (mg/kg)	Chloride mg/kg
S-134	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	85.4	85.4	425
S-135	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	150	150	70.9
S-136	West TB	24-Jun-03	2	0.8	<0.025	<0.125	<10.0	36.8	36.8	727
S-137	West TB	24-Jun-03	2	0.8	<0.025	<0.125	<10.0	258	258	213
S-138	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	288	288	142
S-139	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	153	153	70.9
S-140	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	130	130	337
S-141	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
S-142	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	104	104	709
S-143	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	130	130	780
S-144	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	243	243	88.6
S-145	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	38.6	38.6	35.4
S-146	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	68.4	68.4	106

## Notes:

Laboratory analysis performed by Environmental Lab of Texas, Inc., Odessa, Texas

1. BGS: Denotes sample depth in feet below ground surface

2. ppm: Field headspace reading in parts per million using a phototonization detector

3. mg/kg: Milligrams per kilogram

4. --: No data available

5. &lt;: Less than test method detection limit



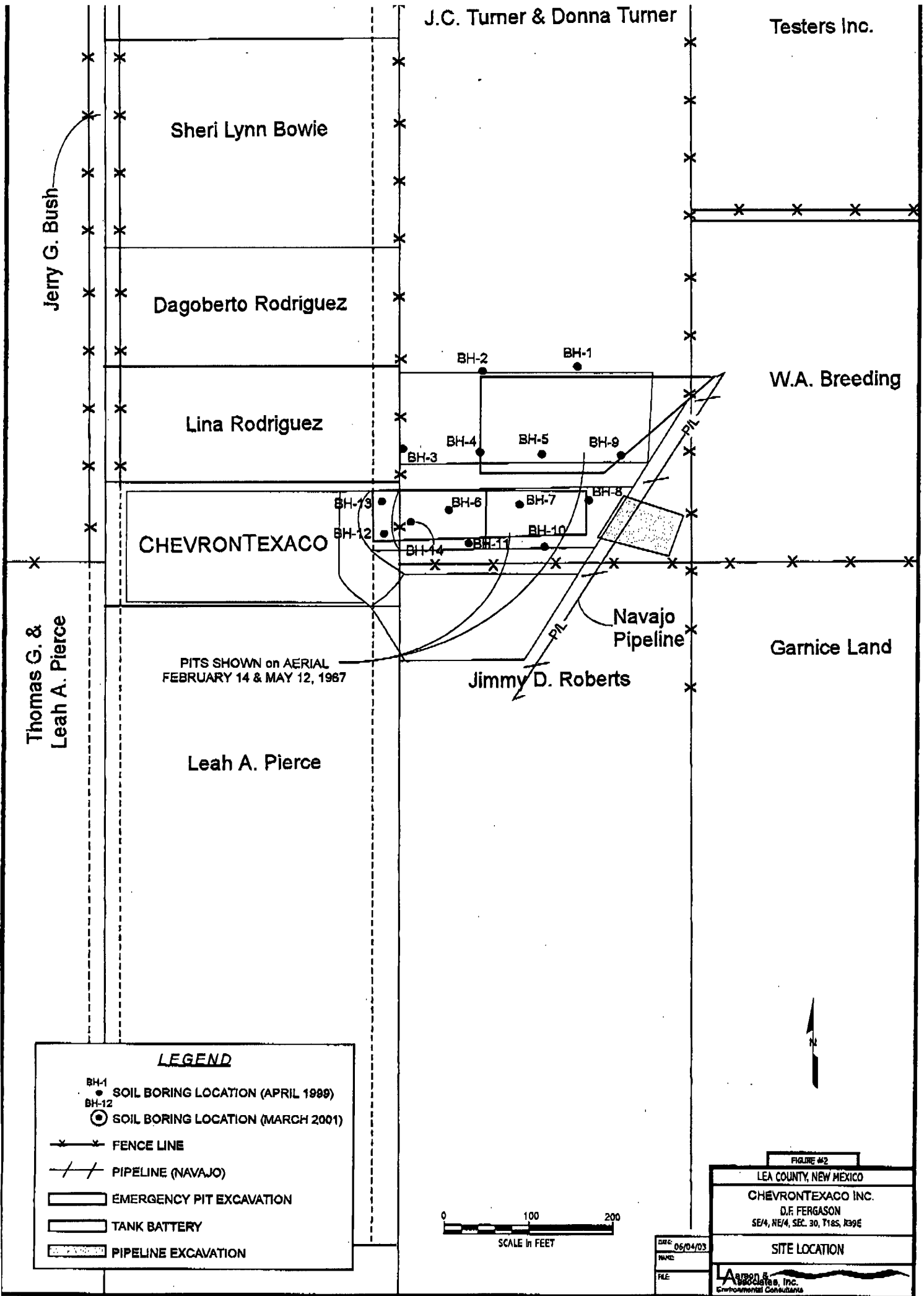
## Figures

507 North Marlenfeld, Suite 202 ♦ Midland, Texas 79701 ♦ Ph. (915) 687-0901 ♦ Fax (915) 687-0456

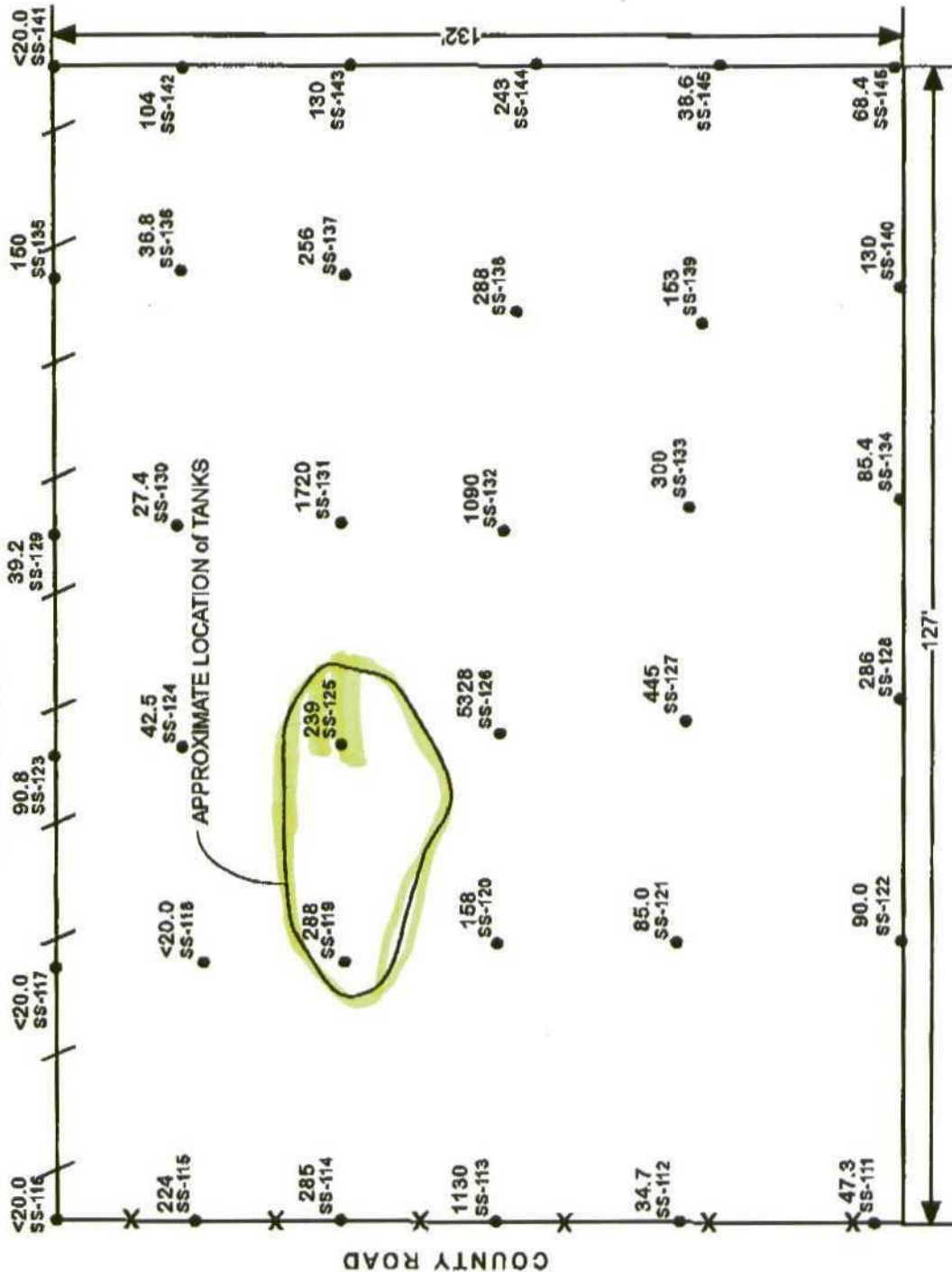
110/2007

10/16/2003 THU 10:56 FAX 915 687 0456 LARSON & ASSOCIATES INC.





LINA RODRIGUES



**LEGEND**

224  
SS-115

● SOIL SAMPLE LOCATION  
(APPROXIMATELY 2 FEET BGS)  
and TPH CONCENTRATION,  
Mg/Kg, JUNE 24, 2003



SCALE AS SHOWN

PRIME #3

LEA COUNTY, NEW MEXICO

**CHEVRONTExACO INC.**  
D.F. FERGASON TANK BATTERY  
8E4, NE4, SECTION 30, T18S, R39E

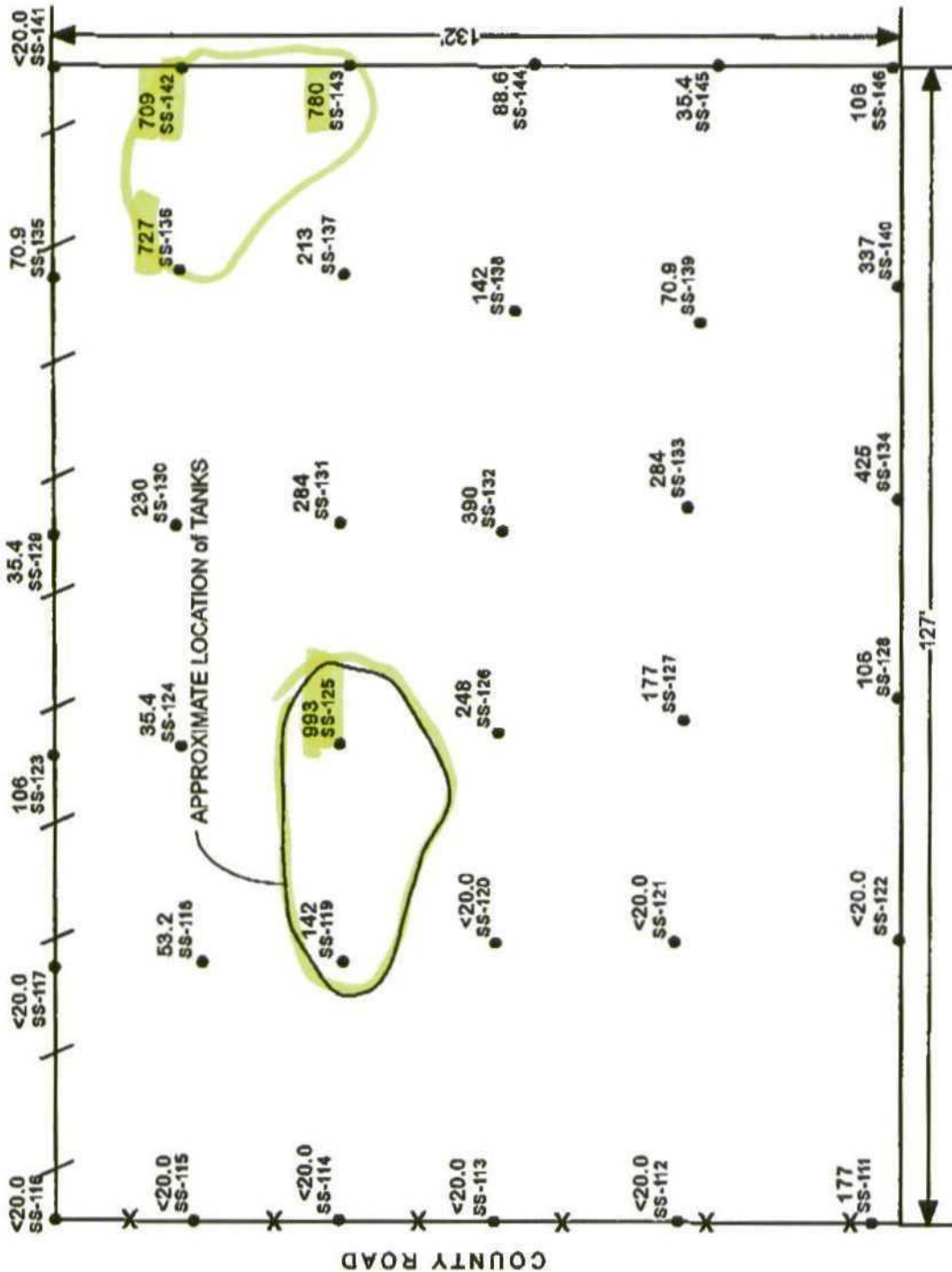
TPH CONCENTRATION IN SOIL  
(2 FEET)

**AUGER**  
Environmental Consultants

AS-DRAWN  
DATE  
BY

0-0107

LINA RODRIGUES



**LEGEND**

- 284 SS-115 SOIL SAMPLE LOCATION (APPROXIMATELY 2 FEET BGS), and CHLORIDE CONCENTRATION, Mg/Kg, JUNE 24, 2003



SCALE as SHOWN

FIGURE #4

LEA COUNTY, NEW MEXICO

**CHEVRONTTEXACO INC.**

D.F. FERGASON TANK BATTERY

SE1/4, NE1/4, SECTION 30, T18S, R30E

CHLORIDE CONCENTRATION  
in SOIL (2 FEET)

DATE: 10/16/03

NINE

FILE: 0-0107

**LARSON & ASSOCIATES, Inc.**  
Environmental Consultants

**Price, Wayne**

---

**From:** Price, Wayne  
**Sent:** Friday, August 29, 2003 2:37 PM  
**To:** 'Mark Larson'; Price, Wayne; 'SToner@chevrontexaco.com'  
**Cc:** Sheeley, Paul; Johnson, Larry; Darrell Moore (E-mail)  
**Subject:** RE: D.F. Fergason - Chlorides 1R0257

Tracking:	Recipient	Read
	'Mark Larson'	
	Price, Wayne	Read: 8/29/2003 2:37 PM
	'SToner@chevrontexaco.com'	
	Sheeley, Paul	
	Johnson, Larry	
	Darrell Moore (E-mail)	

Dear Mr. Toner:

The OCD is in receipt of the "Preliminary Report and Closure Request for Emergency Pit Excavation, D.F. Fergason U.L. H. (SE/4,NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico" dated August 28, 2003 and submitted by Larson and Associates, Inc. requesting that the main portion of the excavation be backfilled and properly compacted with clean soil and area reseeded. OCD understands that the pipeline and east area will remain open for future investigation. OCD hereby approves of this request.

Please be advised that NMOCD approval of this plan does not relieve Chevron-Texaco of liability should their operations have failed 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 Chevron-Texaco of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Wayne Price-OCD

cc-Mr. Turner- property owner

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

**From:** Mark Larson [mailto:mark@laenvironmental.com]  
**Sent:** Friday, August 29, 2003 12:38 PM  
**To:** Price, Wayne  
**Subject:** FW: D.F. Fergason - Chlorides

Wayne: I talked to Scott Toner with ChevronTexaco regarding the chlorides at the D. F. Fergason, and several things that ChevronTexaco thought are presented below.

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

**From:** Toner, Scott L (SToner) [mailto:SToner@chevrontexaco.com]  
**Sent:** Monday, June 16, 2003 1:14 PM  
**To:** Mark Larson  
**Subject:** D.F. Fergason - Chlorides

We have discussed the NMOCD's request to investigate the chlorides in the soil beneath the excavation at the former D.F. Fergason Lease, and we would like to note the following points:

8/29/2003

1. There was no chloride issue identified during the investigation of this site.
2. Since there was no issue identified, the remediation plan did not include any clean up level for chlorides.
3. Soil sampling completed during the excavation work still did not show any chloride problem associated with the former pits.

Since there has been no data collected to date that shows an issue with chlorides in the soil, ChevronTexaco does not see any benefit in trying to document that levels beneath the excavation decrease with depth. The Company believes that the levels of chloride at the site do not represent a threat to groundwater.

If you have any questions or would like to discuss this further, please give me a call.

**Scott Toner**, Environmental Specialist  
HES Group

**ChevronTexaco Exploration & Production Company**  
CTNAU, Permian Business Unit  
15 Smith Road, Midland, TX 79705  
Tel (915) 687-7318 Fax (915) 687-7660

<mailto:stoner@chevrontexaco.com>

**FAX**

**DATE:** August 28, 2003  
**TO:** Wayne Price  
**WITH:** New Mexico Oil Conservation Division  
Santa Fe, New Mexico  
**FAX:** (505) 476-3462  
**FROM:** Mark J. Larson  
**WITH:** Larson and Associates, Inc.  
**cc:** Scott Toner  
**PAGES (with cover):** 14  
**Re:** Preliminary Report and Closure Request for Emergency Pit  
Excavation, D.F. Ferguson Lease, U. L. H (SE/4, NE/4), Section 30,  
Township 18 South, Range 39 East, Lea County, New Mexico

Wayne: Please find attached report and closure request for the emergency pit excavation at the above-referenced location. Your consideration for approving closure of the main excavation is appreciated. The original report, including laboratory reports, will be mailed tomorrow. Please contact me at (432) 687-0901 or email [mark@Laenvironmental.com](mailto:mark@Laenvironmental.com) if you have questions.  
Mark

Larson and Associates, Inc.  
507 N. Marienfeld Street  
Suite 202  
Midland, Texas 79701  
(432) 687-0901 (office)  
(432) 687-0456 (fax)  
[mark@Laenvironmental.com](mailto:mark@Laenvironmental.com)

Please call (432) 687-0901 if this transmittal is not legible



August 28, 2003

**VIA FACSIMILE: (505) 476-3462**

Mr. Wayne Price  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Preliminary Report and Closure Request for Emergency Pit Excavation, D. F. Fergason Lease, U. L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County New Mexico**

Dear Mr. Price:

ChevronTexaco Exploration and Production (Chevron Texaco), as successor to Texaco Exploration and Production, Inc. (Texaco), has retained Larson & Associates, Inc. (LA) to supervise remediation of a former emergency pit (Site) once associated with a tank battery at the D. F. Fergason Lease located in unite letter (UL) H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East, Lea County, New Mexico. The emergency pit remediation was conducted in accordance with a remediation plan that was approved by the New Mexico Oil Conservation Division (NMOCD) on March 8, 2002. The remediation plan proposed to excavate soil in the vicinity of borings BH-12 and BH-14, to achieve the approved recommended remediation action level (RRAL) of 100 milligrams per kilogram (mg/kg) for total petroleum hydrocarbons (TPH). The RRAL for TPH was based on guidelines established by the NMOCD. The NMOCD approved the remediation plans with the condition that remediation include the area east of the ARCO (currently Navajo Pipeline) pipeline near the southeast corner of the Site, areas between borings BH-7 and BH-12, between borings BH-7 and BH-14, between borings BH-13 and BH-3, around boring BH-13, northeast of boring BH-13 and around BH-10. The NMOCD also required laboratory analysis of final soil samples for benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX), TPH and chloride. CrownQuest Operating is the current operator for the D.F. Fergason Lease, and has discounted using the tank battery. CrownQuest Operating removed all equipment from the battery site, and ChevronTexaco acquired the property from the owner to facilitate remediation of the emergency pit. This report presents the results and a request to close the excavation associated with the emergency pit excavation west of the Navajo Pipeline. A separate report and closure request will be submitted following completion of remediation activities associates with the pipeline area, and area southeast of the pipeline. Figure 1 presents a Site location map.

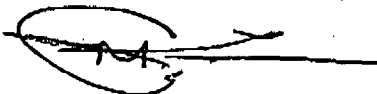
Turner Services, Inc. commenced work at the Site on April 15, 2003. The emergency pit was excavated to a depth of approximately 40 feet below ground surface

(bgs). Approximately 56,310 cubic yards of contaminated soil was removed from the excavation, and transported to ChevronTexaco's landfarm located in the west half of Section 17, Township 17 South, Range 36 East, Lea County, New Mexico. The final excavation dimensions were approximately 225 x 315 feet. Figure 2 presents a contoured drawing of the excavation. Clean soil was obtained from an area about 3 miles east of the Site, and is currently stockpiled at the Site. Soil samples were collected during the excavation process for field and laboratory screening. Soil samples were field screened using a RAE Instruments photoionization detector (PID), and a Wilks Enterprise, Inc. infrared TPH analyzer. Soil samples were analyzed by the laboratory for verification using method SW-846-8015 for gasoline range organics (GRO) and diesel range organics (DRO), benzene, total BTEX and chloride. Table 1 presents a summary of the screening samples. Final samples were collected from the excavation on June 26, 2003. The samples were collected at various locations and depths, and were analyzed for TPH using method SW-846-8015 for GRO and DRO, BTEX using method SW-846-8021B and chloride using method SW-846-9253. Table 2 presents a summary of the final samples. Final sample locations are presented on Figure 2. Appendix A presents the laboratory reports.

Referring to Table 2, no levels of TPH, benzene, or total BTEX exceeded the RRALs in the final soil samples. The concentration of chloride in the final samples ranged from less the method detection limit of 20 mg/kg to 372 mg/kg. The average chloride concentration for the excavation was calculated at approximately 143 mg/kg. Based on the depth-to-groundwater (93.50 feet bgs) measured in a nearby well, and groundwater samples collected by the NMOCD, it does not appear that groundwater has been impacted from the Site, therefore, the residual concentration of chloride in soil should not be of concern. ChevronTexaco requests permission from the NMOCD to fill the main excavation with the clean soil. The excavation will be crowned slightly to assist runoff from the area. A final cover of grass will be applied to the area. ChevronTexaco will provide a letter to the NMOCD following completion of the backfilling. Please call MR. Scott Toner with ChevronTexaco at (432) 687-7318 or myself at (432) 687-0901 if you have questions. You may also email at [stoner@chevrontexcaco.com](mailto:stoner@chevrontexcaco.com) or [mark@Laenvironmental.com](mailto:mark@Laenvironmental.com).

Sincerely,

*Larson and Associates, Inc.*



Mark J. Larson, CPG, CGWP  
President  
Encl.

cc: Scott Toner - ChevronTexaco  
Paul Sheeley - NMOCD District I

## **APPENDIX A**

### **Laboratory Reports**

## TABLES

507 North Marlenfeld, Suite 202 ♦ Midland, Texas 79701 ♦ Ph. (915) 687-0901 ♦ Fax (915) 687-0456

0005/014

08/28/2003 THU 16:42 FAX 915 687 0456 LARSON & ASSOCIATES INC.

Table 1

## Summary of Soil Screening Samples from Emergency Pit Excavation

D.F. Ferguson Lease

U. L. H (SE/4, NE/4) Section 30, Township 18 South, Range 39 East

Lea County, New Mexico

Sample Number	Sample Location	Sample Date	Sample Depth (BGS)	PID (ppm)	Benzene mg/kg	BTEX mg/kg	GRO C12 mg/kg	DRO >C12-C35 mg/kg	TPH C35 mg/kg	C6 mg/kg	Chloride mg/kg
RRAL					10	50			100		
S-1	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-2	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-3	East of Pipeline	16-Apr-03	2	0.4	---	---	<10.0	24.6	24.6	---	---
S-4	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	108	108	---	---
S-5	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	45.2	45.20	---	---
S-6	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-7	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-8	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-9	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-10	East of Pipeline	16-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-11	East of Pipeline	17-Apr-03	2	0.7	---	---	<10.0	<10.0	<20.0	---	---
S-12	East of Pipeline	17-Apr-03	2	1.5	---	---	<10.0	<10.0	<20.0	---	---
S-13	East of Pipeline	17-Apr-03	2	0.3	---	---	<10.0	<10.0	<20.0	---	---
S-14	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	108	108	---	---
S-15	East of Pipeline	17-Apr-03	2	0.4	---	---	<10.0	<10.0	<20.0	---	---
S-16	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	68	68	---	---
S-17	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	128	128	---	---
S-18	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	91	91	---	---
S-19	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	53	53	---	---
S-20	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	251	251	---	---
S-21	East of Pipeline	17-Apr-03	2	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-22(4)	East of Pipeline	17-Apr-03	3	0.1	---	---	<10.0	<10.0	<20.0	---	---
S-23(17)	East of Pipeline	18-Apr-03	3	19.5	---	---	<10.0	<10.0	<20.0	---	---
S-24(14)	East of Pipeline	18-Apr-03	3	10.1	---	---	<10.0	116	116	---	---
S-25	SE Corner(W.Pit)	18-Apr-03	6	19.6	---	---	<10.0	<10.0	<20.0	---	---
S-26	SE Corner(W.Pit)	18-Apr-03	12	34.0	---	---	<10.0	163	163	---	---
S-27(14)	East of Pipeline	22-Apr-03	3.5	25.6	---	---	<10.0	<10.0	<20.0	---	---
S-28	W Wall(W.Pit)	22-Apr-03	15	35.6	---	---	<10.0	<10.0	<20.0	---	---
S-29	W Wall(W.Pit)	22-Apr-03	15	146	---	---	65.9	540	606	---	---
S-30	SE Wall(W.Pit)	22-Apr-03	8	60.5	---	---	<50.0	1180	1180	---	---

Table 1

Summary of Soil Screening Samples from Emergency Pit Excavation  
D.F. Ferguson Lease  
U. L. H (SE/4, NE/4) Section 30, Township 18 South, Range 39 East  
Lea County, New Mexico

Sample Number	Sample Location	Sample Date	Sample Depth (BGS)	PID (ppm)	Benzene mg/kg	BTEX mg/kg	10		50		100	
							GRO C12 mg/kg	C6 mg/kg	DRO >C12-C35 mg/kg	TPH C35 mg/kg	C6 mg/kg	Chloride mg/kg
S-31	NE Wall(W.Pit)	22-Apr-03	8	48.5	---	---	110	---	4960	---	5070	---
S-32	NW Wall(W.Pit)	22-Apr-03	8	15.3	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-33	S Wall(W.Pit)	23-Apr-03	8	47.3	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-34	S Wall(W.Pit)	23-Apr-03	8	123	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-35	S Wall(W.Pit)	23-Apr-03	8	127	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-36	S Wall(W.Pit)	23-Apr-03	8	2.1	---	---	<10.0	<10.0	14.4	14.4	14.4	---
S-37	S Wall(W.Pit)	23-Apr-03	8	18.7	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-38	S Wall(W.Pit)	23-Apr-03	8	13.4	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-39(20)	East of Pipeline	23-Apr-03	3.5	24.6	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-40	N Wall(W.Pit)	24-Apr-03	10	88.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-41	N Wall(W.Pit)	24-Apr-03	10	34.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-42	N Wall(W.Pit)	24-Apr-03	10	15.4	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-43	N Wall(W.Pit)	24-Apr-03	10	18.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-44	N Wall(W.Pit)	24-Apr-03	10	34.6	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-45	W Wall(W.Pit)	25-Apr-03	18	148	---	---	---	---	---	---	---	---
S-46	W Wall(W.Pit)	25-Apr-03	18	617	---	---	---	---	---	---	---	---
S-47	W Wall(W.Pit)	25-Apr-03	18	450	---	---	---	---	---	---	---	---
S-48	S Wall(W.Pit)	29-Apr-03	18	7.6	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-49	S Wall(W.Pit)	29-Apr-03	18	6.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-50	MidBottom(W.Pit)	29-Apr-03	18	476	---	---	21.2	144	144	185	185	---
S-51	MidBottom(W.Pit)	29-Apr-03	18	1999	---	---	762	2660	2660	3422	3422	---
S-52	MidBottom(W.Pit)	29-Apr-03	18	126	---	---	<10.0	<10.0	29.9	29.9	29.9	---
S-53	MidBottom(W.Pit)	29-Apr-03	18	95.6	---	---	<10.0	<10.0	868	868	868	---
S-54	N Wall(W.Pit)	30-Apr-03	8	17.3	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-55	N Wall(W.Pit)	30-Apr-03	8	49.0	---	---	<10.0	<10.0	633	633	633	---
S-56	NE Corner(W.Pit)	30-Apr-03	8	94.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-57	SE Corner(W.Pit)	30-Apr-03	8	44.6	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-58	E Side TB	06-May-03	5	210	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-59	E Side TB	06-May-03	5	16.8	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-60	W Wall(W.Pit)	07-May-03	12	100	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-61	W Wall(W.Pit)	07-May-03	12	100	---	---	<10.0	<10.0	21.1	21.1	21.1	---
S-62	W Wall(W.Pit)	07-May-03	12	100	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-63	W Wall(W.Pit)	07-May-03	12	100	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-64	W Wall(W.Pit)	08-May-03	18	11.6	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-65	W Wall(W.Pit)	08-May-03	18	2.1	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---

Table 1

## Summary of Soil Screening Samples from Emergency Pit Excavation

D.F. Ferguson Lease

U. L. H (SE/4, NE/4) Section 30, Township 18 South, Range 39 East

Lea County, New Mexico

Sample Number	Sample Location	Sample Date	Sample Depth (BGS)	PID (ppm)	Benzene mg/kg	BTEX mg/kg	10		50		100	
							GRO C12	C6 mg/kg	DRO >C12-C35	TPH C35	C6 mg/kg	Chloride mg/kg
RRAL												
S-66	W Wall(W.Pit)	08-May-03	18	2.0	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-67	W Wall(W.Pit)	08-May-03	18	4.5	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-68	W Bench	08-May-03	5	2.6	---	---	<10.0	<10.0	19.2	19.2	19.2	---
S-69	W Bench	08-May-03	5	29.3	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-70	W Bench	08-May-03	5	23.0	---	---	---	47.8	30.9	78.70	---	---
S-71	Junction Box(STB)	09-May-03	4	3.5	---	---	<10.0	<10.0	34.2	34.2	34.2	106
S-72	W Bench(TB)	13-May-03	5	0.7	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-73	W Bench(TB)	13-May-03	5	0.1	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-74	W Bench(TB)	13-May-03	5	2.2	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-75	W Bench(TB)	13-May-03	5	0.9	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-76	MidBottom(W.Pit)	14-May-03	30	149.2	---	---	---	1040	3080	4120	---	---
S-77	West Mid TB	23-May-03	8	55.0	---	---	---	---	---	**17	---	---
S-78	MidBottom(W.Pit)	26-May-03	*50	123	---	---	---	---	---	**898	---	---
S-79	MidBottom(W.Pit)	27-May-03	*50	189	---	---	---	---	---	**1098	---	---
S-80	W MidBottom	02-Jun-03	*50	1999	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-81	MidBottom	02-Jun-03	*52.5	1999	---	---	<10.0	<10.0	24.2	24.2	24.2	---
S-82	MidBottom	02-Jun-03	*56	1999	---	---	<10.0	<10.0	<10.0	<20.0	<20.0	---
S-83	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	13.9	13.9	13.9	319
S-84	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	337
S-85	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	319
S-86	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	319
S-87	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	354
S-88	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	284
S-89	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	284
S-90	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	18.6	18.6	18.6	301
S-91	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	284
S-92	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	284
S-93	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	19.3	19.3	19.3	337
S-94	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	142
S-95	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	<10.0	<20.0	<20.0	142
S-96	W Bottom Pit	05-Jun-03	*53	---	<0.025	<0.125	<10.0	<10.0	31.8	31.8	31.8	213

Table 1

Summary of Soil Screening Samples from Emergency Pit Excavation  
D.F. Ferguson Lease  
U. L. H (SE/4, NE/4) Section 30, Township 18 South, Range 39 East  
Lea County, New Mexico

Sample Number	Sample Location	Sample Date	Sample Depth (BGS)	PID (ppm)	Benzene mg/kg	BTEX mg/kg	GRO C12 mg/kg	DRO >C12-C35 mg/kg	TPH C35 mg/kg	C6 mg/kg	Chloride mg/kg
RRAL					10	50			100		
S-97	E Bottom Pit	05-Jun-03	22	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0	195
S-98	E Bottom Pit	05-Jun-03	22	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0	70.9
S-99	Pile in Pit	20-Jun-03	--	15.0	--	--	<10.0	40.4	40.4	40.4	--
S-100	Pit @ Pipeline	20-Jun-03	8	0.4	--	--	<10.0	28.3	28.3	28.3	35.4
S-101	Pit @ Pipeline	20-Jun-03	8	26.6	--	--	36.6	2150	2187	2187	35.4
S-102	Pit @ Pipeline	20-Jun-03	8	2.2	--	--	<10.0	35.8	35.8	35.8	<20.0
S-103	Pit @ Pipeline	20-Jun-03	8	600	--	--	310	4500	4810	4810	<20.0
S-104	Pit @ Pipeline	20-Jun-03	8	--	--	--	13.6	3570	3584	3584	<20.0
S-105	Pit @ Pipeline	20-Jun-03	8	66.8	--	--	18.1	165	183	183	<20.0
S-106	Pit @ Pipeline	24-Jun-03	13	145	--	--	262	1540	1802	1802	--
S-107	Pit @ Pipeline	24-Jun-03	13	548	--	--	482	2240	2722	2722	--
S-108	Pit @ Pipeline	24-Jun-03	13	550	--	--	674	2450	3124	3124	--
S-109	Pit @ Pipeline	24-Jun-03	10	308	--	--	289	2560	2849	2849	--
S-110	Pit @ Pipeline	24-Jun-03	10	103	--	--	561	15400	15961	15961	--
S-111	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	47.3	47.3	47.3	177
S-112	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	34.7	34.7	34.7	<20.0
S-113	West TB	24-Jun-03	2	---	<0.025	<0.125	<50.0	1130	1130	1130	<20.0
S-114	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	285	285	285	<20.0
S-115	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	224	224	224	<20.0
S-116	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0	<20.0
S-117	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0	<20.0
S-118	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0	53.2
S-119	West TB	24-Jun-03	2	50.0	<0.025	0.072	<10.0	288	288	288	142
S-120	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	158	158	158	<20.0
S-121	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	85.0	85.0	85.0	<20.0
S-122	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	90.0	90.0	90.0	<20.0
S-123	West TB	24-Jun-03	2	---	<0.025	0.078	<10.0	90.8	90.8	90.8	106
S-124	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	42.5	42.5	42.5	35.4
S-125	West TB	24-Jun-03	2	41.0	<0.025	<0.125	<10.0	239	239	239	993
S-126	West TB	24-Jun-03	2	---	<0.025	<0.125	88.3	5240	5328	5328	248
S-127	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	445	445	445	177
S-128	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	286	286	286	106
S-129	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0	39.2	39.2	39.2	35.4



Table 1

## Summary of Soil Screening Samples from Emergency Pit Excavation

D.F. Ferguson Lease

U. L. H (SE/4, NE/4) Section 30, Township 18 South, Range 39 East

Lea County, New Mexico

Sample Number	Sample Location	Sample Date	Sample Depth (BGS)	PID (ppm)	Benzene mg/kg	BTEX mg/kg	10		50		100	
							GRO C12	C6 mg/kg	DRO >C12-C35	TPH C35	C6 mg/kg	Chloride mg/kg
RRAL												
S-130	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		27.4	27.4		230
S-131	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		1720	1720		284
S-132	West TB	24-Jun-03	2	21.0	<0.025	<0.125	<10.0		1090	1090		390
S-133	West TB	24-Jun-03	2	21.0	<0.025	<0.125	<10.0		300	300		284
S-134	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		85.4	85.4		425
S-135	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		150	150		70.9
S-136	West TB	24-Jun-03	2	0.8	<0.025	<0.125	<10.0		36.8	36.8		727
S-137	West TB	24-Jun-03	2	0.8	<0.025	<0.125	<10.0		256	256		213
S-138	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		288	288		142
S-139	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		153	153		70.9
S-140	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		130	130		337
S-141	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		<10.0	<20.0		<20.0
S-142	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		104	104		709
S-143	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		130	130		780
S-144	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		243	243		88.6
S-145	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		38.6	38.6		35.4
S-146	West TB	24-Jun-03	2	---	<0.025	<0.125	<10.0		68.4	68.4		106

Notes: Laboratory analyses performed by Environmental Lab of Texas, Inc., Odessa, Texas

1. BGS Sample depth in feet below ground surface

2. PID: Photoionization detector measurement

3. ppm: Parts per million

4. GRO: Gasoline-range organics by method SW-846-8015

5. DRO: Diesel-range organics by method SW-846-8015

6. TPH: Total petroleum hydrocarbons (Sum of GRO + DRO)

7. mg/kg Milligrams per kilogram

8. ---: No data available

9. &lt;: Less than method detection limit

10. RRAL: Recommended remediation action level (NMOCD)

11. \*: Estimated depth (surveyed depth approximately 35 feet BGS)

12. \*\*: Field TPH measurement

**Table 2**  
**Summary of Laboratory Analysis of Soil Samples from Emergency Pit Excavation**  
**D.F. Fergason Lease**  
**U. L. H (SE/4, NE/4), Section 30, Township 18 South, Range 39 East**  
**Lea County, New Mexico**

Sample Number	Sample Location	Sample Date	Sample Depth (feet BGS)	Benzene mg/kg	BTEX mg/kg	GRO C6 C12 mg/kg	DRO >C12-C35 mg/kg	TPH (C6-C35) mg/kg	Chloride mg/kg
RRAL				10	50			100	
1	West End	25-Jun-03	10	<0.025	<0.125	<10.0	<10.0	<20.0	230
2	West End	25-Jun-03	10	<0.025	<0.125	<10.0	<10.0	<20.0	53.2
3	West End	25-Jun-03	10	<0.025	<0.125	<10.0	<10.0	<20.0	106
4	West End	25-Jun-03	10	<0.025	<0.125	<10.0	<10.0	<20.0	177
5	West End	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
6	West End	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	124
7	West End	25-Jun-03	18	<0.025	<0.125	<10.0	<10.0	<20.0	70.9
8	West End	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	88.6
9	West End	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
10	West End	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	195
11	South Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
12	South Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	372
13	South Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	354
14	South Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	124
15	East End	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	195
16	East End	25-Jun-03	22	<0.025	<0.125	<10.0	80.8	80.8	142
17	East End	25-Jun-03	22	<0.025	<0.125	<10.0	28.0	28.0	142
18	Bottom	25-Jun-03	30	<0.025	<0.125	<10.0	<10.0	<20.0	284
19	Bottom	25-Jun-03	30	<0.025	<0.125	<10.0	48.8	48.8	177
20	Bottom	25-Jun-03	34	<0.025	<0.125	<10.0	<10.0	<20.0	319
21	Bottom	25-Jun-03	34	<0.025	<0.125	<10.0	51.0	51.0	88.6
22	North Side	25-Jun-03	3	<0.025	<0.125	<10.0	33.1	33.1	<20.0
23	North Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	35.4
24	North Side	25-Jun-03	24	<0.025	<0.125	<10.0	<10.0	<20.0	70.9
25	North Side	25-Jun-03	24	<0.025	<0.125	<10.0	26.6	26.6	35.4
26	North Side	25-Jun-03	24	<0.025	<0.125	<10.0	17.5	17.5	70.9
27	North Side	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	53.2
28	North Side	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	35.4
29	North Side	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	35.4
30	North Side	25-Jun-03	16	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0
31	North Side	25-Jun-03	16	<0.025	<0.125	<10.0	30.2	30.2	142
32	North Side	25-Jun-03	7	<0.025	<0.125	<10.0	<10.0	<20.0	<20.0

Notes: Laboratory analyses performed by Environmental Lab of Texas, Inc., Odessa, Texas

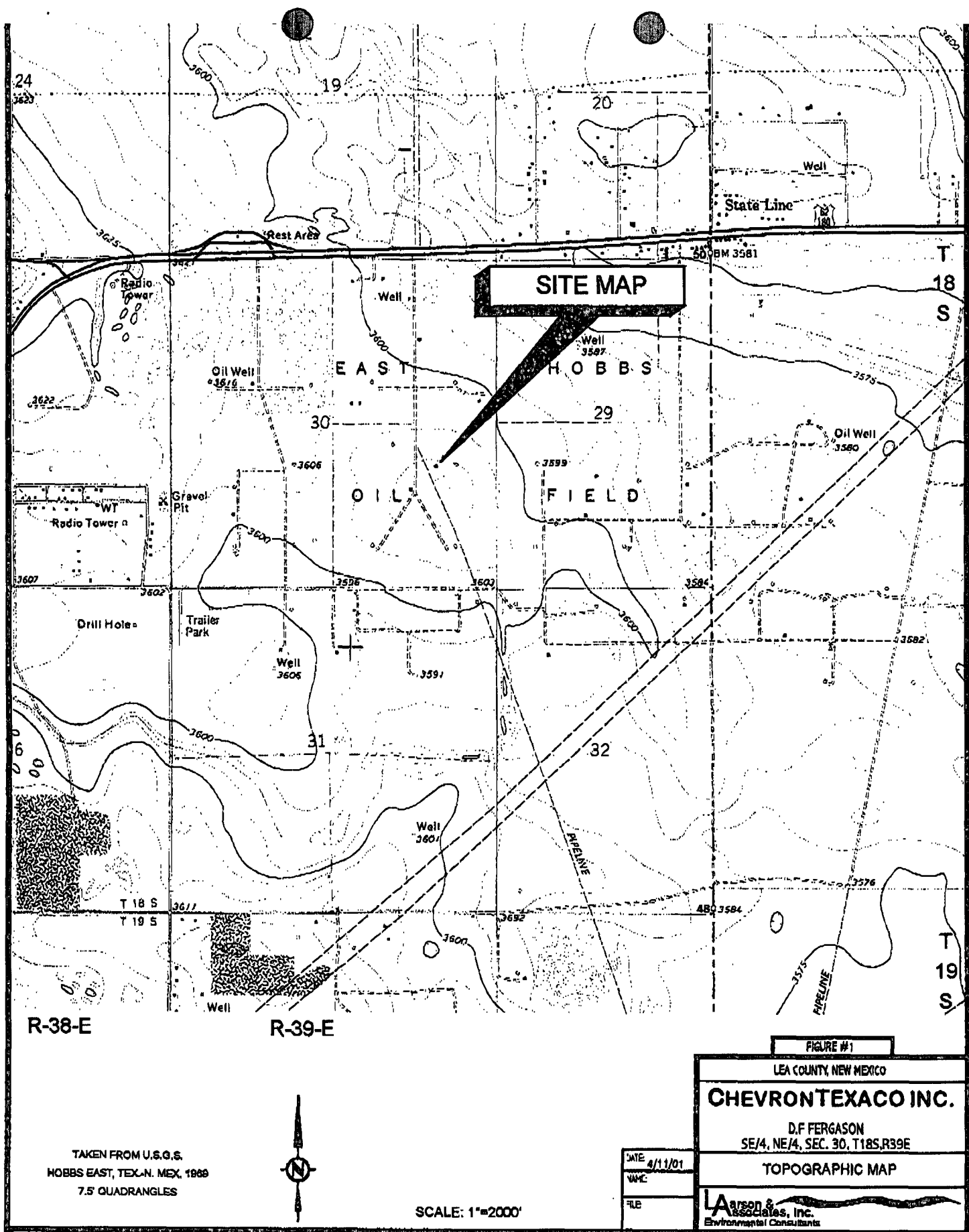
1. BGS Sample depth in feet below ground surface
2. GRO: Gasoline-range organics by method SW-846-8015
3. DRO: Diesel-range organics by method SW-846-8015
4. TPH: Total petroleum hydrocarbons (Sum of GRO + DRO)
5. mg/kg Milligrams per kilogram
6. <: Less than method detection limit
7. RRAL: Recommended remediation action level (NMOCD)

## FIGURES

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012/014

08/28/2003 THU 16:43 FAX 915 687 0456 LARSON & ASSOCIATES INC.







# TRANSACTION REPORT

P. 01

AUG-28-2003 THU 03:42 PM

FOR:

RECEIVE

DATE	START	SENDER	RX TIME	PAGES	TYPE	NOTE	M#	DP
AUG-28	03:40 PM	915 687 0456	2'21"	14	RECEIVE	OK		

\*\*\*\*\*

## Price, Wayne

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**From:** Price, Wayne  
**Sent:** Wednesday, October 30, 2002 11:00 AM  
**To:** 'tdomme@mstLAW.com'; Price, Wayne  
**Cc:** robins@robinscloud.com  
**Subject:** RE:

1R0257

APPROVED!

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

**From:** tdomme@mstLAW.com [mailto:tdomme@mstLAW.com]  
**Sent:** Wednesday, October 30, 2002 10:35 AM  
**To:** wprice@state.nm.us  
**Cc:** robins@robinscloud.com  
**Subject:** RE:

> Wayne:

>

> As we discussed today, Bill Robbins and I jointly, on behalf of our  
> respective clients, request an additional 30 day extension in the date by  
> which remediation is to commence on the D.F.Ferguson Lease as has been  
> ordered by the NMOCD. We request that remediation commence no later than  
> December 2, 2002.

>

> Thank you for your consideration of this request.

RE-SENT

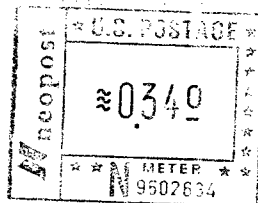
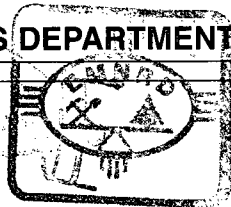
Mr. Bill Robins III  
910 Travis suite 2020  
Houston, Texas 77002



State of New Mexico

**ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT**

1220 South Saint Francis Drive  
P.O. Box 6429  
Santa Fe, New Mexico 87505-5472



REFUSED  
SAM HOUSTON STATION  
HOUSTON TX 77002

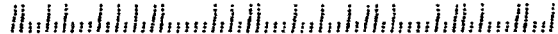
*Refused  
Post 2/24*

~~Mr. Bill Robinson~~

Gallagher, Lewis & Downey  
40<sup>th</sup> Floor Nations Bank Center  
700 Louisiana  
Houston, Texas 77002

*not at his address*

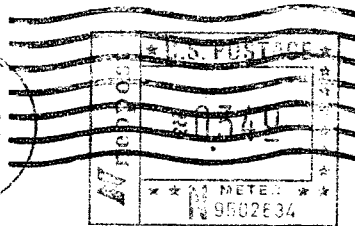
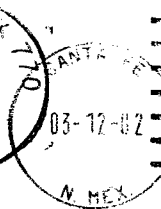
~~155-21-23~~



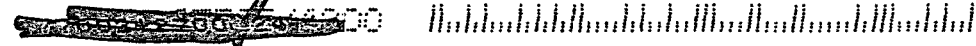
STATE OF NEW MEXICO  
ENERGY MINERALS AND  
NATURAL RESOURCES DEPARTMENT  
1220 SOUTH SAINT FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505

POST OFFICE STATION  
HOUSTON TX 77002

*refused  
RA 2024*



*Not at this Address*  
Mr. Bill Robins III  
Gallagher, Lewis & Downey  
40<sup>th</sup> Floor Nations Bank Center  
700 Louisiana  
Houston, Texas 77002



**Price, Wayne**

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**From:** Price, Wayne  
**Sent:** Friday, March 08, 2002 11:56 AM  
**To:** 'Mark Larson'; Price, Wayne  
**Cc:** Patterson, Robert H; rAnderson@state.nm.us; Olson, William  
**Subject:** RE: Meeting Summary and Work Plan Clarification, D.F. Fergason Tank Battery Emergency Pit, NE/4, NE/4, Sec. 30, T. 18 S., R. 39 E., Lea County, NM, March 1, 2002

APPROVED!

Please be advised that NMOCD approval of this plan does not relieve Chevron-Texaco 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 Chevron-Texaco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

**From:** Mark Larson [mailto:mark@laenvironmental.com]  
**Sent:** Thursday, March 07, 2002 2:19 PM  
**To:** Price, Wayne  
**Cc:** Patterson, Robert H; rAnderson@state.nm.us; wOlson@state.nm.us  
**Subject:** Re: Meeting Summary and Work Plan Clarification, D.F. Fergason Tank Battery Emergency Pit, NE/4, NE/4, Sec. 30, T. 18 S., R. 39 E., Lea County, NM, March 1, 2002

Dear Mr. Price:

Approval by the New Mexico Oil Conservation Division of the above-referenced communication dated March 1, 2002, is requested. Please call me if you have any questions,

Sincerely,

Mark J. Larson

Larson and Associates, Inc.

507 N. Marienfeld St., Suite 202

Midland, Texas 79701

(915) 687-0901 (office)

(915) 687-0456 (fax)

cc: BILL ROBINS

3/12/2002

**Price, Wayne**

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**From:** Mark Larson [mark@laenvironmental.com]  
**Sent:** Friday, March 01, 2002 8:25 AM  
**To:** Price, Wayne  
**Cc:** Patterson, Robert H; rAnderson@state.nm.us; wOlson@state.nm.us  
**Subject:** Re: Meeting Summary and Remediation Workk Plan Clarification, D.F. Fergason Tank Battery Emergency Pit, NE/4, NE/4, Sec. 30-Ts18S, R39E, Lea County, NM

Dear Mr. Price:

This is a summary of a meeting between representatives of the New Mexico Oil Conservation Division (Roger Anderson, William Olson and Wayne Price), Texaco Exploration and Production Inc. (Robert Patterson) and Larson and Associates, Inc. (Mark Larson) that occurred on Wednesday, February 20, 2001. The meeting was scheduled to discuss the remediation plan for an emergency pit (Site) that was once associated with the D.F. Fergason lease tank battery. The remediation plan was part of a report submitted to the NMOCD on May 21, 2001. The NMOCD approved the remediation plan on December 13, 2001, and requested that the remediation plan include the area east of the ARCO pipeline located near the southeast corner of the Site, the area between borings BH-7 and BH-12, BH-7 and BH-14, BH-13 and BH-3, around BH-13, northeast of BH-3 and around BH-10. As discussed in the February 20, 2002 meeting, the area around borings BH-12, BH-13 and BH-14 will be excavated to approximately 27 feet below ground surface (BGS) to remove soil impacted by total petroleum hydrocarbons (TPH) above the NMOCD Recommended Remediation Action Level (RRAL) of 100 milligrams per kilogram (mg/kg). The area encompassed by the excavation will extend into the areas identified by the NMOCD near the southwest corner of the Site in its letter of December 13, 2001. Soil found in these areas to be impacted from the pit above the RRAL will be removed from the Site. The remediation plan also proposes to excavate soil from the area around borings BH-7, BH-8 and BH-9, and will encompass the area identified by the NMOCD near boring BH-10 and the pipeline. Soil samples will be collected from the sides and bottom of each excavation, and analyzed for BTEX, TPH and chloride using approved methods. No metal or general chemistry analysis, other than chloride, will be performed since the soil will be excavated and removed from the Site, as agreed by the NMOCD. The soil is an exempt waste, and will therefore be transported to Texaco's centralized landfarm located northwest of Jal, New Mexico. The excavated areas will be filled with clean soil, and the upper 3 feet of the excavations will be filled with topsoil, and seeded. The final results will be submitted to the NMOCD, as specified in the approval letter. Please call me at (915) 687-0901 if you have questions.

cc: HOBBS OCO  
MR. BILL ROBINS III

3/1/2002



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

December 13, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357 7348**

Mr. Robert Patterson  
Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79701

Re: DF Fergason Lease- OCD Case # 1R0257  
NE/4 NE/4 Sec 30-Ts18S-R39E  
Lea Co. NM

Dear Mr. Patterson:

The New Mexico Oil Conservation Division (OCD) is in receipt of Texaco Exploration and Production Inc.'s (Texaco) "Additional Investigation and Remediation Plan" dated May 21, 2001 for the above captioned site. The OCD hereby approves of the plan with the following additional conditions:

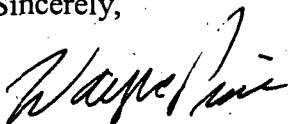
1. As a result of information received from the landowner's attorney/consultant, OCD requested that Texaco perform additional investigations. As a result of those investigations Texaco reported finding additional contamination. The following areas were not included in the second investigation phase and therefore OCD shall require Texaco to investigate these areas during the remediation phase to determine if additional work is required:
  - A. The area east of ARCO pipeline, located on the southeast part of the Turner property.
  - B. The area(s) located between BH-7 and BH-12; between BH-7 and BH-14.
  - C. The area(s) around BH-13, between BH-13 and BH-3, and northeast of BH-3.
  - D. The area around BH-10.

2. Any additional contamination discovered outside of the original investigation area(s) shall be included in the remediation effort and cleaned-up pursuant to Texaco's proposed Recommended Remediation Action Levels (RRAL).
3. Notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours and receive OCD approval before back-filling any excavated area.
4. The final bottom hole and sidewall samples of the excavations will also be analyzed for BTEX (method 8021), General Chemistry and WQCC metals using EPA methods.
5. Submit the final results of the investigation, remediation, and waste disposal to the OCD Santa Fe Office for approval by **July 15, 2002** with a copy provided to the OCD Hobbs District Office.

Please be advised that NMOCD approval of this plan does not relieve Texaco 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 Texaco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at 505-476-3487 or E-mail [WPRICE@state.nm.us](mailto:WPRICE@state.nm.us).

Sincerely,



Wayne Price- Engineer

cc: OCD Hobbs Office  
Mr. Bill Robins III

**Price, Wayne**

1R0257

**From:** Price, Wayne  
**Sent:** Monday, February 05, 2001 10:23 AM  
**To:** 'patterh@texaco.com'  
**Cc:** 'larsonandassociates@prodigy.net'  
**Subject:** D.F. Fergason Lease -

Dear Mr. Patterson:

The NMOCD is in receipt of the Scope of Work for Continued Investigation of the southwest part of the original investigation. The NMOCD hereby approves of the work plan and requires Texaco to submit the findings by March 30, 2001.

Please be advised that NMOCD approval of this work plan does not relieve Texaco E&P Inc. of responsibility should their activities 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 Texaco E&P Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.