

AP - 001

APPROVALS

YEAR(S):

2000-1994



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 31, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-3341

Mr. Reggie Baker
Huntsman Corporation
P.O. Box 3986
Odessa, Texas 79760

**RE: FINAL CLOSURE FOR AREAS "A" AND "B"
STAGE 2 ABATEMENT PLAN (AP-1)
BRICKLAND REFINERY
SUNLAND PARK, NEW MEXICO**

Dear Mr. Baker:

The New Mexico Oil Conservation Division (OCD) has reviewed Huntsman Corporation's (HC) June 22, 2000 "BRICKLAND REFINERY SITE – PARCEL A AND B – ABATEMENT PLAN TERMINATION REQUEST" which was submitted on behalf of HC by their consultant Enviroman. This document requests termination of the abatement plan for Area "A" and Area "B" at the former Brickland Refinery in Sunland Park, New Mexico as part of a plan to transfer ownership of these lands to the City of Sunland Park for use as a wastewater treatment facility. The termination request is based upon information and data showing that New Mexico Water Quality Control Commission (WQCC) standards as set forth in 20 NMAC 6.2.4103 have been met in Area "A" and Area "B".

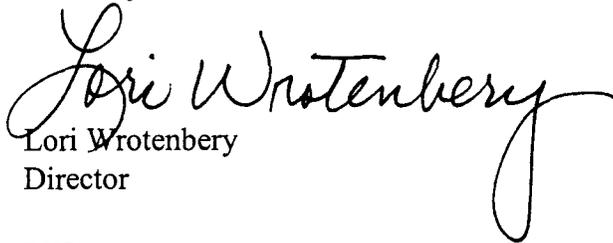
Pursuant to 20 NMAC 6.2.4112.B., the above-referenced abatement completion report and request for termination of the abatement plan for the areas defined as Area "A" and Area "B" at the former Brickland Refinery in Sunland Park, New Mexico is approved subject to receipt of the legally recorded restrictive covenants prohibiting beneficial use of well water or disturbance of the cap for lead-contaminated soils.

Please be advised that OCD approval does not relieve HC of liability if remaining contaminants in Area "A" and Area "B" pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve HC of responsibility for compliance with any other federal, state or local laws and regulations.

Mr. Reggie Baker
July 31, 2000
Page 2

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,


Lori Wrotenberg
Director

LW/wco

xc: OCD Artesia Office
 Annie Kearns, NMED Ground Water Quality Bureau
 Todd Carver, Enviroman
 Yusuf E. Farran, International Boundary and Water Commission



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
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Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 24, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-3211

Mr. Reggie Baker
Huntsman Corporation
P.O. Box 3986
Odessa, Texas 79760

**RE: STAGE 2 ABATEMENT PLAN CAP CONSTRUCTION
BRICKLAND REFINERY**

Dear Mr. Baker:

The New Mexico Oil Conservation Division (OCD) has reviewed Huntsman Corporation's (HC) February 23, 2000 "HUNTSMAN POLYMERS-BRICKLAND SITE CONSTRUCTION OF CAP" which was submitted on behalf of HC by their consultant Enviroman. This document requests approval of the final as built construction of the cap for lead contaminated soils at the former Brickland Refinery in Sunland Park, New Mexico.

The OCD approves of the final as built construction of the cap for lead contaminated soils as documented in HC's August 20, 1999 "HUNTSMAN BRICKLAND REFINERY SITE COVER INSTALLATION REPORT". Please be advised that OCD approval does not relieve HC of liability if the cover fails to adequately control threats to surface water, ground water human health or the environment. In addition, OCD approval does not relieve HC of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely

William C. Olson
Hydrologist
Environmental Bureau

xc: OCD Artesia Office
Annie Kearns, NMED Ground Water Quality Bureau
Todd Carver, Enviroman
Yusuf E. Farran, International Boundary and Water Commission



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

May 5, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-650

Mr. Reggie Baker
Huntsman Corporation
P.O. Box 3986
Odessa, Texas 79760

**RE: CAP CONSTRUCTION ADDENDUM
BRICKLAND REFINERY STAGE 2 ABATEMENT PLAN**

Dear Mr. Baker:

The New Mexico Oil Conservation Division (OCD) has reviewed Huntsman Corporation's (HC) April 26, 1999 "BRICKLAND REFINERY SITE, SUNLAND PARK, NEW MEXICO, WORK PLAN ADDENDUM" which was submitted on behalf of HC by R.T. Hicks Consultant, Ltd. This document contains modifications to HC's work plan for construction of a cap for lead contaminated soils at the former Brickland Refinery in Sunland Park, New Mexico. The modifications consist of plugging and abandoning and monitor wells MW-2 and MW-13 and majority of the site well points in order to facilitate installation of the cap.

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

1. HC shall not plug and abandon any of the well points in Area G.
2. HC shall plug monitor wells MW-2 and MW-13 from bottom to top with a cement grout containing 3-5% bentonite.

Please be advised that OCD approval does not relieve HC of liability if the work plan fails to adequately protect surface water, ground water, human health or the environment at the site. In addition, OCD approval does not relieve HC of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: OCD Artesia Office
Mora Hanning, NMED Superfund Program
Todd Carver, R.T. Hicks Consultants, Ltd.
Yusuf E. Farran, International Boundary and

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

April 26, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-644

Mr. Reggie Baker
Huntsman Corporation
P.O. Box 3986
Odessa, Texas 79760

**RE: STAGE 2 ABATEMENT PLAN
CAP CONSTRUCTION
BRICKLAND REFINERY
SUNLAND PARK, NEW MEXICO**

Dear Mr. Baker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Huntsman Corporation's (HC) March 29, 1999 "BRICKLAND REFINERY SITE, SUNLAND PARK, NEW MEXICO, CONSTRUCTION QUALITY ASSURANCE PLAN AND WORK PLAN APPROVAL" which was submitted on behalf of HC by their consultant R.T. Hicks Consultant, Ltd. These documents contain HC's work plan for construction of the cap for lead contaminated soils identified at the former Brickland Refinery in Sunland Park, New Mexico.

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

1. All wastes generated will be disposed of at an OCD-approved facility or in an OCD approved manner.
2. The final construction report will be submitted to the OCD within 60 days of completion of the cap construction. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve HC of liability if the work plan fails to adequately protect surface water, ground water, human health or the environment at the site. In addition, OCD approval does not relieve HC of responsibility for compliance with any other federal, state or local laws and regulations.

Mr. Reggie Baker
April 26, 1999
Page 2

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: OCD Artesia Office
 Mora Hanning, NMED Superfund Program Manager
 Todd Carver, R.T. Hicks Consultants, Ltd.
 Yusuf E. Farran, International Boundary and Water Commission

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

December 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-582

Mr. Reggie Baker
Huntsman Corporation
P.O. Box 3986
Odessa, Texas 79760

**RE: STAGE 2 ABATEMENT PLAN PROPOSAL
BRICKLAND REFINERY
SUNLAND PARK, NEW MEXICO**

Dear Mr. Baker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Huntsman Corporation's (HC) October 6, 1998 "STAGE 2 ABATEMENT PLAN FOR FORMER BRICKLAND REFINERY SITE" and August 14, 1998 "STAGE 2 ABATEMENT PLAN, FORMER BRICKLAND REFINERY SITE, HUNTSMAN POLYMERS CORPORATION". These documents contain HC's draft Stage 2 Abatement Plan Proposal for remediation of contaminated soil and ground water identified during Rexene's Stage 1 site investigations at the former Brickland Refinery in Sunland Park, New Mexico. The documents also contain proof of notice of HC's Stage 2 Abatement Plan.

The OCD did not receive any public comments or requests for a public hearing during the 60-day notice period. Therefore, pursuant to New Mexico Water Quality Control Commission (WQCC) regulation 4109.C., the above referenced Stage 2 Abatement Plan is approved with the following conditions:

1. All tanks that contain fluids other than fresh water will be placed within an impermeable containment system bermed to contain one and one-third times the volume of the largest tank or one and one-third times the volume of all interconnected tanks, whichever is greater.
2. All below-grade wastewater lines will be pressure tested to a minimum of 3 psi above normal operating pressure prior to operation. The results of any testing will be provided to the OCD.

Mr. Reggie Baker
December 17, 1998
Page 2

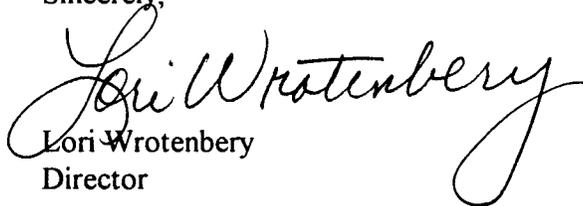
3. All wastes generated will be disposed of at an OCD-approved facility.
4. All water quality samples will be obtained and analyzed using EPA-approved methods and quality assurance/quality control (QA/QC) procedures.
5. The annual report will be submitted to the OCD by February 2 of each year. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Artesia District Office. The report will contain:
 - a. A description of all monitoring and remediation activities that occurred during the previous calendar year including conclusions and recommendations.
 - b. Summary tables of all past and present laboratory analytical results of ground water and surface water sampling and plots of concentration vs. time for contaminants of concern for each monitoring point. Copies of the previous calendar year laboratory analytical data sheets and associated QA/QC data will also be included.
 - c. A semiannual water table elevation map using the water table elevation of the ground water in all monitor wells and well points.
 - d. Plots of water table elevation vs. time for each ground water monitoring point.
 - e. An annual free product thickness map created using the free product thickness in all monitor wells and well points.
 - f. Isopleth maps for all contaminants of concern (*ie.*, benzene, BTEX, etc.)
 - g. The total semiannual volume of fluid pumped from each recovery well and the total volume recovered to date.
 - h. The semiannual volume of product recovered and the total recovered to date.
 - i. The disposition of all wastes generated.
 - j. As built construction details of the recovery system.
 - k. The results of all below-grade line testing.
 - l. A map showing the locations of the soil cap areas and all as-built construction details of the soil cap system including soil test results verifying that the cap design criteria have been met.

Mr. Reggie Baker
December 17, 1998
Page 3

Please be advised that OCD approval does not relieve HC of liability if the Stage 2 Abatement Plan fails to adequately protect surface water, ground water, human health or the environment or if the plan fails to adequately remediate and monitor contamination at the site. In addition, OCD approval does not relieve HC of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,



Lori Wrotenberg
Director

xc: OCD Artesia Office
Mora Hanning, NMED Superfund Program Manager
Reid Bandeen, TRW Systems & Information Technology
Yusuf E. Farran, International Boundary and Water Commission

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

May 21, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-175

Mr. Todd M. Carver
Rexene Corporation
5005 LBJ Freeway, Occidental Tower
Dallas, Texas 75244

**RE: FINAL SITE INVESTIGATION REPORT
BRICKLAND REFINERY**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rexene Corporation's (Rexene) Stage 1 Final Site Investigation Report which contains the results of all soil and ground water contamination investigations at the former Brickland Refinery in Sunland Park, New Mexico.

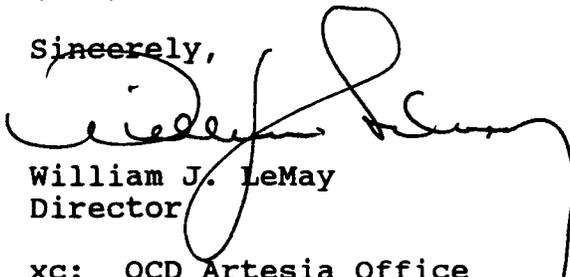
The Stage 1 Final Investigation Report, as contained in the following documents, is **approved**.

- December 20, 1996 "FINAL SITE INVESTIGATION REPORT FOR THE FORMER BRICKLAND REFINERY STAGE I ABATEMENT PLAN".
- March 21, 1997 "RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION FINAL COMMENTS ON BRICKLAND REFINERY SITE FINAL SITE INVESTIGATION REPORT".

Pursuant to New Mexico Water Quality Control Commission (WQCC) regulation 4106.D, the OCD requires that Rexene submit a Stage 2 Abatement Plan Proposal to the OCD by July 21, 1997. Please prepare the Stage 2 Abatement Plan Proposal in accordance with WQCC regulation 4106.E.

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,


William J. LeMay
Director

xc: OCD Artesia Office
Mora Hanning, NMED Superfund Program Manager
Mike Selke, BDM International
Yusuf E. Farran, International Boundary and Water Commission

P 410 431 175

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

January 2, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-233

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: UNDERGROUND PROCESS TANK REMOVAL WORK PLAN
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has reviewed Rexene Corporation's (Rexene) December 26, 1996 "WORK PLAN FOR ENVIRONMENTAL SERVICES, BRICKLAND SITE, SUNLAND PARK, NEW MEXICO" which was submitted on behalf of Rexene by their consultant Daniel B. Stephens & Associates, Inc. This document contains Rexene's work plan for closure of a former underground process tank and a former concrete service pit at the former Brickland Refinery in Sunland Park, New Mexico. The work plan also includes an assessment of potential soil impacts from the underground tank.

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

1. Soil samples from the excavations will be sampled and analyzed for concentrations of aromatic and halogenated volatile organics, total petroleum hydrocarbons and metals using EPA approved methods.
2. All wastes will be disposed of at OCD approved facilities.
3. Rexene will submit a report on the excavation, removal and investigative activities to the OCD by February 14, 1997. The report will contain:
 - a. A description of all removal and investigative activities which occurred including conclusions and recommendations.

Mr. Todd M. Carver
January 2, 1997
Page 2

- b. A summary of the laboratory analytic results of soil sampling and the laboratory analyses and associated quality assurance/quality control data.
 - c. Maps showing the locations of the underground tank, concrete pit and all soil sampling points.
 - d. The volume and disposition of all wastes generated.
4. Rexene will notify the OCD at least one week in advance of scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
 5. All documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve Rexene of liability if the work plan fails to adequately remediate or investigate contamination related to Rexene's activities. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office
Mora Hanning, NMED Superfund Program Manager
Damian Reed, Daniel B. Stephens & Associates, Inc.
Yusuf E. Farran, International Boundary and Water Commission

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

June 7, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-156

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: GROUND WATER MONITORING PLAN
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has reviewed Rexene Corporation's March 21, 1996 "GROUNDWATER SAMPLING AT THE FORMER BRICKLAND REFINERY SITE". This document contains Rexene's proposed ground water and surface water monitoring program for the former Brickland Refinery in Sunland Park, New Mexico.

The above monitoring plan is approved with the following conditions:

1. Ground water from monitor wells MW-3S, MW-3D, MW-6S, MW-6D and MW-9S and surface water at locations upstream of the facility and directly downstream of MW-6S will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) during the months of June and December of each respective year.
2. Ground water from monitor wells MW-3S, MW-3D, MW-6S, MW-6D and MW-9S and surface water at locations upstream of the facility and directly downstream of MW-6S will be sampled and analyzed for concentrations of heavy metals and polynuclear aromatic hydrocarbons during the month of June in each respective year.
3. All water quality samples will be obtained and analyzed using appropriate EPA methods.
4. All wastes generated will be disposed of only upon prior approval by the OCD.

Mr. Todd M. Carver
June 7, 1996
Page 2

5. Rexene will submit an annual monitoring report to the OCD by February 2 of each year. The report will contain:
 - a. A description of all monitoring activities which occurred during the year including conclusions and recommendations.
 - b. Summary tables of all past and present laboratory analytic results of ground water and surface water sampling and plots of concentration vs. time for contaminants of concern for each monitoring point. Copies of the most recent years laboratory analytical data sheets will also be included.
 - c. A semi-annual water table elevation map using the water table elevation of the ground water in all monitor wells and well points.
 - d. Plots of water table elevation vs. time for each ground water monitoring point.
6. Rexene will notify the OCD at least 2 weeks in advance of all scheduled monitoring activities such that the OCD has the opportunity to witness the events and/or split samples.
7. All monitoring reports will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not limit Rexene to the above monitoring program should future site monitoring indicate that contaminants are migrating from the facility or if contamination exists which is beyond the scope of the plan. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office
Maura Hanning, NMED Superfund Program Manager
Michael W. Selke, Geoscience Consultants, Ltd.

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OIL CONSERVATION DIVISION
2040 S. PACHECO
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(505) 827-7131

April 14, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-245

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: QUARTERLY GROUND WATER MONITORING
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rexene Corporation's March 2, 1995 "MODIFICATIONS TO THE QUARTERLY GROUNDWATER MONITORING PROGRAM FOR THE BRICKLAND REFINERY SITE". This document contains Rexene's proposed modification of the previously approved ground water monitoring at the former Brickland Refinery in Sunland Park, New Mexico.

The above referenced monitoring program modification is approved with the following conditions:

1. During each quarter Rexene will also sample ground water from monitor well MW-15 for concentrations of benzene, toluene, ethylbenzene, xylene and polynuclear aromatic hydrocarbons using EPA approved methods.
2. During each quarter Rexene will also sample surface water from the Rio Grande downstream of monitor well MW-6 for concentrations of benzene, toluene, ethylbenzene, xylene and polynuclear aromatic hydrocarbons using EPA approved methods.
3. Quarterly reports will contain:
 - a. A description of all activities which occurred during the quarter.
 - b. A summary of the laboratory analytic results of water quality sampling of monitor wells and well points during the quarter. The data from each monitoring point will be presented in tabular form and will list past and present sampling results.

Mr. Todd M. Carver
 April 14, 1995
 Page 2

- c. A water table elevation map using the water table elevation of the ground water in all refinery monitor wells and well points.
- d. A product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells and well points.
- e. Contaminant specific isoconcentration maps for all major relevant contaminants which can be found in ground water throughout the refinery site (ie. Benzene, BTEX, PAH's, etc.)

Please be advised that OCD approval does not limit Rexene to the work proposed should future site monitoring indicate that contaminants are migrating from the facility or if contamination exists which is beyond the scope of the plan. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson
 Hydrogeologist
 Environmental Bureau

xc: OCD Artesia Office
 Kerrie E. Neet, NMED Superfund Program Manager
 Trent Thomas, Geoscience Consultants, Ltd.

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Bill Olson

From: Bill Olson
To: Tim Gumm
Cc: Ray Smith
Subject: Brickland Refinery
Date: Thursday, April 13, 1995 4:40PM
Priority: High

Attached you will find a draft approval letter for Rexene Corp. proposed monitoring of ground water at the Brickland Refinery. Please provide me with any comments by 11:00 am on 4/14/95. Thanks!

<<File Attachment: MONITOR1.APR>>

Bill Olson

From: Tim Gumm
Date sent: Friday, April 14, 1995 7:49AM
To: Bill Olson
Subject: Registered: Tim Gumm

Your message

To: Tim Gumm
Subject: Brickland Refinery
Date: Thursday, April 13, 1995 4:40PM
was accessed on
Date: Friday, April 14, 1995 7:49AM

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 30, 1995

CERTIFIED MAIL

RETURN RECEIPT NO. P-667-242-206

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: REMEDIAL INVESTIGATION REPORT
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rexene Corporation's December 7, 1994 "THIRD QUARTER MONITORING RESULTS", December 1, 1994 "REMEDIAL INVESTIGATION REPORT FOR THE FORMER BRICKLAND REFINERY" and October 12, 1994 "ANALYTICAL DATA AND MONITOR WELL SUMMARY". These documents provide the results of recent soil and ground water investigations at the former Brickland Refinery in Sunland Park, New Mexico. These documents also recommend 2 additional consecutive quarterly samplings of site monitor wells prior to submission of a remedial action plan.

The investigation actions taken and the sampling recommendations as contained in the above referenced documents are approved with the following conditions:

1. During each quarter Rexene will also sample ground water from all well points which do not contain free phase products, with the exception of well points WP-26S, 26D, 31, 32, 33, 34, 35, 36 and 37. Ground water from these well points will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene using EPA approved methods.
2. Rexene will submit a quarterly report to the OCD by May 26, 1995 and August 25, 1995. Quarterly reports will contain:
 - a. A description of all activities which occurred during the quarter.

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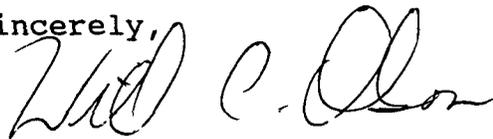
Mr. Todd M. Carver
January 30, 1995
Page 2

- b. A summary of the laboratory analytic results of water quality sampling of monitor wells and well points during the quarter. The data from each monitoring point will be presented in tabular form and will list past and present sampling results.
 - c. A water table elevation map using the water table elevation of the ground water in all refinery monitor wells and well points.
 - d. A product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells and well points.
 - e. Contaminant specific isoconcentration maps for all major relevant contaminants which can be found in ground water throughout the refinery site (ie. Benzene, BTEX, PAH's, etc.)
3. The May 26, 1995 quarterly report will include the following information which was omitted from the December 1, 1994 Remedial Investigation Report:
- a. All recent field photoionization measurements of soils taken from the boreholes and monitor wells.
 - b. The TCLP hazardous waste characterizations of the stockpiled soils from the excavated trenches.
 - c. The proposed disposal method for the stockpiled soils.
4. The August 25, 1995 quarterly report will include a plan and schedule for remediation of contaminated soils and ground water.

Please be advised that OCD approval does not limit Rexene to the work proposed should future site monitoring indicate that contaminants are migrating from the facility or if contamination exists which is beyond the scope of the plan. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office
Kerrie E. Neet, NMED Superfund Program Manager
Trent Thomas, Geoscience Consultants, Ltd.

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OIL CONSERVATION DIVISION



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June 20, 1994

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RETURN RECEIPT NO. P-111-334-135

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: ADDITIONAL INFORMATION ON REMEDIAL INVESTIGATION WORK PLAN
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rexene Corporation's June 16, 1994 "COMMENTS CONCERNING THE REMEDIAL INVESTIGATION WORK PLAN". This document provides information on the completion of well points at the Brickland Refinery and the proposed disposal of wastes generated during implementation of remedial investigation work plan which was approved by the OCD on June 10, 1994. This document also requests extension of the time schedule for submission of the report on the investigation activities and approval of the work elements regarding the well points.

The above referenced requests are approved with the following conditions:

1. Rexene will include in the remedial investigation report information on the depth at which ground water was encountered for all new monitor wells and well points and those previously installed.
2. Regardless of waste characterization, Rexene will submit the proposed disposal method for all liquid and solid wastes generated during the investigation to OCD for approval prior to disposal.

Mr. Todd M. Carver
June 20, 1994
Page 2

Please be advised that OCD approval does not relieve Rexene of liability should the investigation activities determine that contamination exists which is beyond the scope of the work plan or if the investigation activities fail to adequately define the extent of contamination related to their activities. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office
Kerrie E. Neet, NMED Superfund Program Manager
Trent Thomas, Geoscience Consultants, Ltd.

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BRUCE KING
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ANITA LOCKWOOD
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June 10, 1994

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CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-128

Mr. Todd M. Carver
Vice President Environmental Affairs
Rexene Corporation
5005 LBJ Freeway
Occidental Tower
Dallas, Texas 75244

**RE: REMEDIAL INVESTIGATION WORK PLAN
BRICKLAND REFINERY
DONA ANA COUNTY, NEW MEXICO**

Dear Mr. Carver:

The New Mexico Oil Conservation Division (OCD) has completed a review of Rexene Corporation's May 6, 1994 "PROPOSED REMEDIAL INVESTIGATION WORK PLAN", May 6, 1994 "SAMPLING, ANALYSIS AND QUALITY ASSURANCE PLAN FOR REMEDIAL INVESTIGATION AT THE FORMER BRICKLAND REFINERY" and March 17, 1994 "REXENE BRICKLAND REFINERY SITE: PROGRESS REPORT ON STORM WATER INTERIM MEASURES AND REMEDIAL ACTION". These documents present the results of recent soil and ground water investigations and propose additional investigations of the extent of contamination at the site.

The recommendations for additional investigations are approved with the following conditions:

1. Prior to the installation of additional well points or adjustment of existing well points, Rexene will provide to the OCD for approval the proposed completion schematics for these well points.
2. The four proposed monitor wells will be completed with a minimum of 5 feet of well screen above the water table and 10 feet of well screen below the water table.
3. Soil samples from the depth interval with the highest field photo-ionization reading from each borehole will be analyzed for total petroleum hydrocarbons (TPH) using appropriate EPA analytical methods.

Mr. Todd M. Carver
June 10, 1994
Page 2

4. All ground water samples taken for metals analysis will be analyzed for New Mexico Water Quality Control Commission (WQCC) metals not RCRA metals.

NOTE: The OCD does not require that ground water samples from monitor wells or well points be analyzed for TPH since there is no WQCC ground water standard for TPH. In addition, the OCD does not require that ground water from monitor wells or well points containing free phase product be sampled for concentrations of dissolved phase aromatic purgeable organics (ie. benzene, toluene, ethylbenzene and xylene).

5. Rexene will submit the proposed disposal method for all liquid and solid wastes generated during the investigation to OCD for approval prior to disposal.
6. Rexene will submit an investigation report to OCD by August 5, 1994. The report will include the results of all investigation activities and will also address the following deficiencies noted in the above referenced documents:
 - a. The documents state that the investigation results determined that free-phase floating product was not as widespread in extent as suggested in previous reports. However, no free product data from the well points or monitor wells was provided. Please provide the OCD with this information.
 - b. The "Groundwater Table Map Based On Shallow Well Point Data" was created using the water table elevations from 10 of the 27 well points installed. Please provide the OCD with information about why the remainder of the well points were not used in the creation of this map.
 - c. The documents do not provide any information on the completion interval of the any of the well points. Please provide the OCD with well completion schematics for the well points.
 - d. The "Water Table Map Based On Monitor Well Data" was created using the water table elevations from 10 of the 13 monitor wells. Please provide the OCD with information about why the remainder of the monitor wells were not used in the creation of this map.

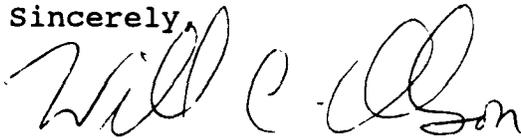
Mr. Todd M. Carver
 June 10, 1994
 Page 3

7. Rexene will notify the OCD at least 72 hours in advance of all scheduled activities such that the OCD may have the opportunity to witness the events and/or split samples.
8. Rexene will supply the OCD Artesia District Office with a copy of the March 17, 1994 and May 6, 1994 reports and will also supply them with a copy of all future reports and correspondence.

Please be advised that OCD approval does not relieve Rexene of liability should the investigation activities determine that contamination exists which is beyond the scope of the work plan or if the investigation activities fail to adequately define the extent of contamination related to their activities. In addition, OCD approval does not relieve Rexene of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-5885.

Sincerely,



William C. Olson
 Hydrogeologist
 Environmental Bureau

Attachment

xc: OCD Artesia Office
 Kerrie E. Neet, NMED Superfund Program Manager
 Trent Thomas, Geoscience Consultants, Ltd.

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