

AP - 002

APPROVALS

YEAR(S):

2003-1997

VonGonten, Glenn, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Friday, March 02, 2007 3:18 PM
To: Jmcmahon@Hobbsnm. Org (jmcmahon@hobbsnm.org)
Cc: Price, Wayne, EMNRD
Subject: Westgate risk based closure (Grimes Battery)
Attachments: FinalSoil.DOC

Joan,

As per your request. Please let me know if you would prefer a fax copy of the signed letter.

Glenn

3/22/2007

October 20, 2003

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Shell E&P Company (Shell) documents:

- September 16, 2003 "STAGE 2 ABATEMENT PLAN (AP-2), GRIMES BATTERY & TASKER ROAD, HOBBS, NEW MEXICO".
- August 5, 2003 "WESTGATE SUBDIVISION, GRIMES BATTERY & TASKER ROAD, STAGE 2 ABATEMENT PLAN, SOIL REMEDIATION ACTIVITIES REPORT, MAY 2003".
- May 29, 2003 "WESTGATE SUBDIVISION, GRIMES BATTERY & TASKER ROAD, STAGE 2 ABATEMENT PLAN, SOIL REMEDIATION ACTIVITIES REPORT, MAY 2003".

These documents contain the results of Shell's remediation of contaminated soils pursuant to the Stage 2 Abatement Plan for the former Grimes Tank Battery located in the Westgate Subdivision in Hobbs, New Mexico. The documents also request approval of the soil remediation actions.

The OCD approves of the above-referenced request and considers the soil remediation actions taken at pit and spill areas related to the Grimes Tank Battery to have been completed in accordance with the approved Stage 2 Abatement Plan for the site. This approval only covers soil remediation actions taken at pit and spill areas in the vicinity of the Grimes Tank Battery and does not apply to ongoing site ground water remediation activities.

Wayne A. Hamilton
October 20, 2003
Page 2

Please be advised that OCD approval does not relieve Shell of responsibility if remaining soil contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Shell 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: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Cliff P. Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

October 20, 2003

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

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- September 16, 2003 "STAGE 2 ABATEMENT PLAN (AP-2), GRIMES BATTERY & TASKER ROAD, HOBBS, NEW MEXICO".
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- May 29, 2003 "WESTGATE SUBDIVISION, GRIMES BATTERY & TASKER ROAD, STAGE 2 ABATEMENT PLAN, SOIL REMEDIATION ACTIVITIES REPORT, MAY 2003".

These documents contain the results of Shell's remediation of contaminated soils pursuant to the Stage 2 Abatement Plan for the former Grimes Tank Battery located in the Westgate Subdivision in Hobbs, New Mexico. The documents also request approval of the soil remediation actions.

The OCD approves of the above-referenced request and considers the soil remediation actions taken at pit and spill areas related to the Grimes Tank Battery to have been completed in accordance with the approved Stage 2 Abatement Plan for the site. This approval only covers soil remediation actions taken at pit and spill areas in the vicinity of the Grimes Tank Battery and does not apply to ongoing site ground water remediation activities.

Wayne A. Hamilton
October 20, 2003
Page 2

Please be advised that OCD approval does not relieve Shell of responsibility if remaining soil contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Shell 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: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Cliff P. Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

August 21, 2003

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of Shell E&P Company's (Shell) March 8, 2001 "SUBMITTAL OF THE W.D. GRIMES WELL NO. 8 INVESTIGATION, ADDITIONAL STAGE 1 ABATEMENT PLAN ACTIVITIES". This document contains the results of Shell's additional investigations and proposed corrective action for soil contamination related to the abandoned W.D. Grimes well #8. These activities were conducted as part of the Grimes Tank Battery/Tasker Road Stage 2 Abatement Plan (AP-2) in Hobbs, New Mexico. The OCD is also in receipt of a May 21, 2003 correspondence from the New Mexico State Epidemiologist containing a review of the risk-assessment portions of the corrective action plan.

On July 18, 2003, the OCD sent correspondence to the law firm of Rosch & Ross, the intervenors in Abatement Plan AP-2. This correspondence requested that the intervenors file a request for hearing by August 18, 2003 if they had any objections to the proposed corrective actions related to the abandoned W.D. Grimes well #8. No request for a hearing has been filed. Therefore, the investigation actions taken are satisfactory and the proposed corrective action for the area of the W.D. Grimes well #8, as contained in the above-referenced documents, is approved.

Please be advised that OCD approval does not relieve Shell of responsibility if remaining contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Shell of responsibility for compliance with any other federal, state or local laws and regulations.

Wayne A. Hamilton
August 21, 2003
Page 2

If you have any questions, please contact Bill Olson of my staff at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long, sweeping horizontal line extending to the right.

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

cc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Cliff P. Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

July 18, 2003

CERTIFIED MAIL

RETURN RECEIPT NO. 7001-1940-0004-7923-0742

Mr. William G. Rosch, III
Rosch & Ross
Chase Bank Building
707 Travis, Suite 2100
Houston, Texas 77002

**RE: SHELL E&P COMPANY
ABATEMENT PLAN AP-2
GRIMES TANK BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Rosch:

The New Mexico Oil Conservation Division (OCD) has completed a review of Shell E&P Company's (Shell) investigation and proposed corrective action for soil contamination at the site of the W.D. Grimes well #8. These activities were conducted as part of the Stage 2 Abatement Plan (AP-2) for the Grimes Tank Battery/Tasker Road in Hobbs, New Mexico. The investigation and proposed corrective actions including all supplemental information is open for public inspection at the OCD Santa Fe and Hobbs District Offices. The OCD has determined that the proposed corrective actions are in compliance with Division rules and could be administratively approvable. Attached is a draft approval letter containing a list of the documents which comprise the investigation and proposed corrective action plan

You withdrew your objection to Shell's original Stage 2 Abatement Plan on the condition that you reserved the right to request a hearing on the future remediation proposal related to contamination at the site of the W.D. Grimes well #8. If you object to the investigations and proposed corrective plan for the W.D. Grimes well #8 area and you wish to present testimony at a hearing, please submit a request for hearing by August 18, 2003. The request should include a concise statement of objections or concerns and any technical evidence supporting your objections. If the Director determines there is significant public interest or that your request has technical merit, the matter will be set for hearing. At the hearing the applicant and intervenors

William G. Rosch
July 18, 2003
Page 2

will present technical testimony to an examiner. Based on the merits of the testimony the examiner will make a recommended decision to the Director regarding the abatement plan. If no request for hearing is received by August 18, 2003, then the abatement plan will be administratively approved.

If you have any questions please do not hesitate to contact me at (505) 476-3490.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/wco

attachment

xc with attachments: Chris Williams, OCD Hobbs Office
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaquez
Wayne Hamilton, Shell E&P Company
Cliff Brunson, BBC International

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
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OFFICIAL USE	
Postage	\$
Certified Fee	JUL 21 2003
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 87505
Sent To: William Rosch - Rosch & Ross	
Street, Apt. No. or PO Box No. 207 Travis Suite 2100	
City, State, ZIP+4 Houston, TX 77002	
PS Form 3800, January 2001	
See Reverse for Instructions	



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

July 18, 2003

CERTIFIED MAIL
RETURN RECEIPT NO.

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

DRAFT

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of Shell E&P Company's (Shell) March 8, 2001 "SUBMITTAL OF THE W.D. GRIMES WELL NO. 8 INVESTIGATION, ADDITIONAL STAGE 1 ABATEMENT PLAN ACTIVITIES". This document contains the results of Shell's additional investigations and proposed corrective action for soil contamination related to the abandoned W.D. Grimes well #8. These activities were conducted as part of the Grimes Tank Battery/Tasker Road Stage 2 Abatement Plan (AP-2) in Hobbs, New Mexico. The OCD is also in receipt of a May 21, 2003 correspondence from the New Mexico State Epidemiologist containing a review of the risk-assessment portions of the corrective action plan.

The investigation actions taken are satisfactory and the proposed corrective action for the area of the W.D. Grimes well #8, as contained in the above-referenced documents, is approved.

Please be advised that OCD approval does not relieve Shell of responsibility if remaining contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Shell of responsibility for compliance with any other federal, state or local laws and regulations.

Wayne A. Hamilton
July 18, 2003
Page 2

DRAFT

If you have any questions, please contact Bill Olson of my staff at (505) 476-3491.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Cliff P. Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

March 3, 2003

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: GROUND WATER MONITORING
STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Company's (Shell) May 3, 2002 "SUBMITTAL OF 2001 GROUNDWATER MONITORING REPORT, WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD." This document contains the results of Shell's annual ground water monitoring under the Stage 2 Abatement Plan for remediation of soil and ground water contamination related to the former Grimes Tank Battery located in the Westgate Subdivision in Hobbs, New Mexico. The document also contains recommendations for modifications to the ground water sampling program and plugging several monitor wells where ground water has been below Water Quality Control Commission Standards for at least 8 consecutive quarters.

The above-referenced recommendations are approved with the following conditions:

1. Shell shall not plug and abandon monitor wells GMW-4, GMW-6 and GMW-11.
2. Plugging and abandonment shall be conducted by cutting the casing off below the ground surface and filling the casing annulus from the bottom to the top with a cement grout containing 3-5% bentonite.
3. Ground water from monitor wells GMW-4, GMW-6 and GMW-11 shall be sampled on an annual basis for concentrations of benzene, toluene, ethylbenzene and xylene.

Wayne A. Hamilton
March 3, 2003
Page 2

Please be advised that OCD approval does not relieve Shell of responsibility if the plan fails to adequately monitor contamination related to Shell's activities or if contamination exists which is outside the scope of the plan. In addition, OCD approval does not relieve Shell of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Cliff P. Brunson, BBC International

Olson, William

From: Olson, William
Sent: Tuesday, September 17, 2002 8:08 AM
To: 'cbrunson@bbcinternational.com'
Subject: RE: Westgate-Suspension of sampling of some monitoring wells

Cliff,

The OCD approves of the temporary suspension of the quarterly sampling as described below.

Sincerely,

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

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

From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Monday, September 16, 2002 8:33 PM
To: William Olson
Cc: Wayne Hamilton; Jennifer Sims; Ken Swinney; Kathleen A. Phillips; Michael Mazzone
Subject: Westgate-Suspension of sampling of some monitoring wells
Importance: High

Bill,

This message is to inform you that Shell E & P Company is suspending the quarterly sampling of eight (8) of the sixteen (16) groundwater monitoring wells located at the Westgate site pending the OCD's review of the recommendations given in Shell's annual groundwater monitoring report. This suspension is effective the 3rd quarter of 2002 (September). The report is titled Westgate Subdivision, Grimes Battery & Tasker Road, 2001 Groundwater Monitoring Report, April 2002. This report was delivered to your office on May 3, 2002. In this report, Shell recommended the permanent plugging and abandoning of eight (8) of the sixteen (16) wells located at this site. Through 2001, these eight wells have been sampled for ten (10) consecutive quarters with results of non-detect for the analytes tested which are BTEX (quarterly) and PAHS (annually) with the exception of well TMW-5 (Wilks backyard) which has had some detection, but well below NMWQCC standards. These have met and exceeded the OCD's requirements of a minimum of eight (8) consecutive quarters of non-detect or below NMWQCC standards for analytes tested. Through June of 2002, five (5) of these wells had been tested for twelve (12) consecutive quarters with the same results. Three (3) of the eight (8) wells to be suspended were plugged due to their removal during the excavation phase of the Stage 2 Abatement Plan for the Westgate Subdivision and therefore were not sampled in 2002.

The remaining eight (8) wells will be sampled quarterly as in the past. These wells are the four (4) wells that are hydrocarbon-impacted and the four (4) wells that are up-gradient, north side-gradient, down-gradient, and south down-gradient of the hydrocarbon plume area.

This suspension is, of course, considered temporary awaiting your review of the annual report and approval of the recommendations. If you have any questions, please do not hesitate to contact me. Please respond back that you have received this message.

9/17/2002

Thanks,

Cliff

Cliff P. Brunson, CEI, CRS

President

BBC International, Inc.

Environmental Specialists

PO Box 805

1324 W. Marland Blvd.

Hobbs, New Mexico USA

88241

e: cbrunson@bbcinternational.com

w: www.bbcinternational.com

t: (505) 397-6388

f: (505) 397-0397

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9/17/2002



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 2, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-4324

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Shell E&P Company (Shell) documents:

- September 6, 2000 "NOTICE OF DEFICIENCY, STAGE 2 ABATEMENT PLAN (AP-2), WESGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD."
- AUGUST 21, 2000 "NOTICE OF DEFICIENCY, STAGE 2 ABATEMENT PLAN (AP-2), WESGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD."
- May 4, 2000 "NOTICE OF DEFICIENCY, STAGE 2 ABATEMENT PLAN (AP-2), SHELL GRIMES LEASE."
- November 30, 1999 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 2 ABATEMENT PLAN PUBLIC NOTICE MAILING AFFIDAVIT AND MAILING LIST."
- October 12, 1999 "SUBMITTAL OF STAGE 2 ABATEMENT PLAN, WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD."

These documents contain Shell's Stage 2 Abatement Plan Proposal for remediation of soil and ground water contamination related to the former Grimes Tank Battery located in the Westgate Subdivision in Hobbs, New Mexico and proof of public notice of the plan.

Wayne A. Hamilton
May 2, 2001
Page 2

The Stage 2 Abatement Plan (AP-2) for the Shell Grimes Tank Battery as contained in the above-referenced documents is approved.

Please be advised that OCD approval does not relieve Shell of responsibility if contamination exists which is outside the scope of the plan; if the plan fails to adequately remediate contamination related to Shell's activities; or if the plan fails to protect public health. In addition, OCD approval does not relieve Shell 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,



Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

February 14, 2001

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-4133

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079


**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Exploration & Production Company's (Shell) February 14, 2001 "STAGE 2 ABATEMENT PLAN (AP-2) GRIMES BATTERY/TASKER ROAD, ABANDON WELL #8 - CHANDLER PROPERTY, HOBBS, NEW MEXICO". This document contains Shell's request for an extension of the deadline for submission of a report on the additional investigation of potential soil contamination in the vicinity of the plugged and abandoned production well adjacent to the Glenda Chandler residence at 1506 N. Cobb, Hobbs, New Mexico. The proposed date for submission of the report is March 9, 2001.

The above referenced extension request is approved. If you have any questions, please contact Bill Olson at (505) 827-7154.

Sincerely,

for 

Roger C. Anderson

Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International
Glenda Chandler



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

December 21, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-4003

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Exploration & Production Company's (Shell) December 6, 2000 "STAGE 2 ABATEMENT PLAN (AP-2) GRIMES BATTERY/TASKER ROAD, HOBBS, NEW MEXICO". This document contains Shell's work plan for additional investigation of potential soil contamination in the vicinity of the plugged and abandoned production well adjacent to the Glenda Chandler residence at 1506 N. Cobb within the Westgate Subdivision in Hobbs, New Mexico.

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

1. All wastes generated during the investigation shall be disposed of at an OCD approved facility or in an OCD approved manner.
2. All samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
3. SHELL will submit a comprehensive report on the investigations to the OCD by February 15, 2001. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
 - a. A description of all past and present investigation activities in this area including discussion of the all past and present results, conclusions and recommendations.

Wayne A. Hamilton
December 21, 2000
Page 2

- b. Summary tables of all past and present soil sampling results in this area including copies of all recent and prior, Shell, OCD and intervenor (if available) laboratory analytical data sheets and associated QA/QC data. Laboratory analytical data sheets which have been previously submitted to the OCD need only be referenced and do not need to be included in the report.
 - c. A site map showing the location of all soil sampling points and boreholes in this area and all relevant site features.
 - d. Geologic/lithologic logs and well completion diagrams for each borehole.
 - e. The disposition of all investigation derived wastes.
 - f. Any other information pertinent to the investigations.
4. SHELL will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit SHELL to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL 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,



Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International
Glenda Chandler



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

September 19, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-3617

Mr. William G. Rosch, III
Rosch & Ross
Chase Bank Building
707 Travis, Suite 2100
Houston, Texas 77002

**RE: SHELL E&P COMPANY
ABATEMENT PLAN AP-2
GRIMES TANK BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Rosch:

The New Mexico Oil Conservation Division (OCD) has completed a review of Shell E&P Company's (Shell) Stage 2 Abatement Plan (AP-2) for the Grimes Tank Battery/Tasker Road in Hobbs, New Mexico. The abatement plan including all supplemental information is open for public inspection at the OCD Santa Fe and Hobbs District Offices. The OCD has determined that the abatement plan is in compliance with all Division rules and could be administratively approvable. Attached is a draft approval letter containing a list of the documents which comprise the Stage 2 Abatement Plan.

An objection to Shell's Stage 2 Abatement Plan was filed by you. If your objections to the plan have not been addressed and you wish to present testimony at a hearing, please submit a request for hearing by October 19, 2000. The request should include a concise statement of objections or concerns and a summary of the evidence you will present at hearing. If the Director determines there is significant public interest or that your request has technical merit, the matter will be set for hearing. At the hearing the applicant and intervenors will present technical testimony to an examiner. Based on the merits of the testimony the examiner will make a recommended decision to the Director regarding the abatement plan. If no request for hearing is received by October 19, 2000, then the abatement plan will be administratively approved.

William G. Rosch
September 19, 2000
Page 2

If you have any questions please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

xc with attachments: Chris Williams, OCD Hobbs Office
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaquez
Wayne Hamilton, Shell E&P Company
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff Brunson, BBC International



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

DRAFT

September 19, 2000

DRAFT

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-3600

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES BATTERY/TASKER ROAD
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Shell E&P Company (Shell) documents:

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- AUGUST 21, 2000 "NOTICE OF DEFICIENCY, STAGE 2 ABATEMENT PLAN (AP-2), WESGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD."
- May 4, 2000 "NOTICE OF DEFICIENCY, STAGE 2 ABATEMENT PLAN (AP-2), SHELL GRIMES LEASE."
- November 30, 1999 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 2 ABATEMENT PLAN PUBLIC NOTICE MAILING AFFIDAVIT AND MAILING LIST."
- October 12, 1999 "SUBMITTAL OF STAGE 2 ABATEMENT PLAN, WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD."

These documents contain Shell's Stage 2 Abatement Plan Proposal for remediation of soil and ground water contamination related to the former Grimes Tank Battery located in the Westgate Subdivision in Hobbs, New Mexico and proof of public notice of the plan.

Wayne A. Hamilton
September 19, 2000
Page 2

DRAFT

The Stage 2 Abatement Plan (AP-2) for the Shell Grimes Tank Battery as contained in the above-referenced documents is approved.

Please be advised that OCD approval does not relieve Shell of liability if contamination exists which is outside the scope of the plan; if the plan fails to adequately remediate contamination related to Shell's activities; or if the plan fails to protect public health. In addition, OCD approval does not relieve Shell 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,

Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International

DRAFT



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

March 14, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-572-907

Mr. Wayne A. Hamilton
Shell E&P Company
200 N. Dairy Ashford
Houston, Texas 77079

**RE: STAGE 2 ABATEMENT PLAN (AP-2)
GRIMES LEASE CONTAMINATION
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (Shell) February 24, 2000 "STAGE 2 ABATEMENT PLAN, WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD". This document contains Shell's request to backfill the excavation inside the fenced area at the former Grimes Tank Battery pursuant to Shells October 1999, Stage 2 Abatement Plan Report, 4.1.2 Task 2—Grimes Battery Section.

Due to the safety hazard that this open excavation presents to the public, the above referenced request is approved. Please be aware that additional remedial actions may be required in this area based upon the results of the requested public hearing on the Stage 2 Abatement Plan. In addition, OCD approval does not relieve Shell 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: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International



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 11, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-654

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 576
Houston, Texas 77001-0576

**RE: GRIMES LEASE/TASKER DRIVE CONTAMINATION
STAGE 1 INVESTIGATION MODIFICATIONS**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Exploration & Production Technology Company's (Shell) May 5, 1999 "WESTGATE SUBDIVISION, STAGE 1 ABATEMENT PLAN MODIFICATION - ADDITIONAL SOIL VAPOR SURVEY". This document contains Shell's proposal for modifying the recently approved Stage 1 Abatement Plan as required by the OCD during our April 28, 1999 meeting. The proposed modification consists of a work plan for additional soil vapor surveys and soil sampling of residential properties to further delineate the extent of contamination related to Shell's Grimes Lease. The proposed modification also includes extending the deadline for submission of the Stage 1 Investigation Report to June 15, 1999 in order to incorporate the proposed work into the report.

The above required work plan modification for additional investigations is **approved with the following conditions:**

1. At least 2 soil samples shall be submitted for laboratory analysis from each backyard of the 1326, 1328 and 1330 Tasker Drive residences. One sample shall be obtained from the sample point with the highest organic vapor content as measured with a photoionization detector (PID). The other sample shall be obtained from the sample point with the highest degree of visual staining. If the highest degree of visual staining occurs at the same soil location as the highest PID measurement, then the 2nd sample shall be obtained from the soil location with the 2nd highest PID measurement.
2. The soil samples shall be obtained and analyzed for aromatic volatile organics, halogenated volatile organics, total petroleum hydrocarbons (TPH), polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control procedures.

Please be advised that OCD approval does not limit Shell to the proposed work plan should the investigation actions fail to adequately define the extent of contamination or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Shell 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,



Roger C. Anderson
Environmental Bureau Chief

xc: Lori Wrotenbery, Director, OCD
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Philip Services
Cliff P. Brunson, BBC International

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

August 13, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-690

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Rm. 4304 Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: GRIMES LEASE STAGE 1 INVESTIGATION REPORT
ABATEMENT PLAN AP-2**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of Shell E&P Technology Company's (SHELL) July 1, 1999 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 1 ABATEMENT REPORT (SITE ASSESSMENT INVESTIGATION)". This document contains the results of SHELL's investigations of the magnitude of contamination related to a former unlined pit located in the Westgate residential subdivision in Hobbs, New Mexico and a former unlined pit at the adjacent Grimes Tank Battery.

The above referenced Stage 1 site investigation report is approved. Pursuant to OCD Rule 19.E.(4), the OCD requires that Shell submit a Stage 2 Abatement Plan Proposal to select and design remedial actions for contaminated soil and ground water which will result in the attainment of the abatement standards and requirements set forth in Rule 19.B. The Stage 2 Abatement Plan Proposal will be submitted to the OCD Santa Fe Office by October 13, 1999 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Health Department
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Arcadis Geraghty & Miller
Cliff P. Brunson, BBC International



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

June 14, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-670

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: GRIMES LEASE STAGE 1 INVESTIGATION REPORT
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (SHELL) May 24, 1999 "GRIMES LEASE/TASKER DRIVE STAGE 1 INVESTIGATION-REPORT SUBMISSION DEADLINE EXTENSION". This document requests that the schedule for submission of the Stage 1 investigation report be extended from June 15, 1999 to July 1, 1999.

The above referenced schedule modification is **approved**.

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Lori Wrotenbery, Director
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross

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NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 22, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-627

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 576
Houston, Texas 77001-0576

RE: GRIMES LEASE STAGE 1 INVESTIGATION MODIFICATIONS


Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell Exploration & Production Technology Company's (Shell) February 17, 1999 "WESTGATE SUBDIVISION, EAST OF TASKER ROAD, STAGE 1 ABATEMENT PLAN MODIFICATION". This document contains Shell's proposal for modifying the recently approved Stage 1 Abatement Plan as required by the OCD during our February 10, 1999 onsite meeting. The proposed modification consists of a work plan for installation of additional boreholes and monitor wells to further delineate the extent of contamination. The proposed modification also includes extending the deadline for submission of the Stage 1 Investigation Report to May 15, 1999.

The above required work plan for additional investigations is **approved**. Please be advised that OCD approval does not limit SHELL to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL 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,


Roger C. Anderson
Environmental Bureau Chief

xc: Lori Wrotenbery, Director, OCD
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Philip Services
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STATE OF NEW MEXICO
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OIL CONSERVATION DIVISION

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

January 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-597

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 576
Houston, Texas 77001-0576

**RE: ADDITIONAL STAGE 1 INVESTIGATIONS
GRIMES LEASE**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Shell Exploration & Production Technology Company (Shell) documents:

- January 14, 1999 "GRIMES LEASE STAGE 1 INTERIM REPORT; RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION (OCD) DECEMBER 15, 1998 LETTER".
- November 16, 1998 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 1 ABATEMENT PLAN INTERIM REPORT, LABORATORY RESULTS UPDATE"
- November 6, 1998 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 1 ABATEMENT PLAN INTERIM REPORT (SITE ASSESSMENT INVESTIGATION)".

These documents contain the results of Shell's recent Stage 1 Abatement Plan investigations of the magnitude and extent of contamination related to a former unlined pit located in the Westgate residential subdivision at 1329 Tasker Road Hobbs, New Mexico, a former unlined pit at the adjacent Grimes Tank Battery and other areas of the Grimes Lease. The documents also contain Shell's work plan for additional investigative actions.

Mr. Wayne A. Hamilton
January 22, 1999
Page 2

The work plan for additional investigations as contained in the above referenced January 14, 1999 document is **approved with the following conditions:**

1. The soils at the base of each excavated/assessed area defined in Task 2 and 3 of Shell's January 14, 1999 correspondence will be surveyed for total organic vapor using a PID meter according to OCD guidelines. Final confirmation samples from the base of each of the excavated/assessed areas will be taken from locations with soils having the highest PID readings. In the absence of measurable concentrations of organic vapor in soils at the base of the excavations, the final confirmation soil samples will be taken from areas directly below the surface source sample locations.
2. SHELL will submit an investigation report to the OCD by April 15, 1999. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
 - a. A description of all investigation activities including discussion of the results (including any OCD sample results), conclusions and recommendations.
 - b. Summary tables of all soil/waste, soil gas and water quality sampling results including copies of laboratory analytical data sheets and associated QA/QC data.
 - c. A site map showing the location of all soil/waste sampling points, boreholes, monitor wells, soil gas survey points, soil assessment/excavation areas and all relevant site features such as pit locations and spill areas.
 - d. A ground water potentiometric map created using the water table elevations from all monitor wells. The map will show the direction and magnitude of the hydraulic gradient.
 - e. Geologic/lithologic logs and well completion diagrams for each borehole and monitor well.
 - f. Soil, soil gas and ground water isopleth maps for contaminants of concern such as benzene, BTEX, TPH and any other significant contaminants found during the investigations.
 - g. The volume and disposition of all wastes generated.
 - h. Any other information pertinent to the investigations.

Mr. Wayne A. Hamilton
January 22, 1999
Page 3

3. SHELL will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit SHELL to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL 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,



Roger C. Anderson
Environmental Bureau Chief

xc: Lori Wrotenberg, Director, OCD
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross
Sharon E. Hall, Philip Services
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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

October 15, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-570

Mr. Wayne A. Hamilton
Shell E&P Technology Company
Woodcreek
200 N. Dairy Ashford
Houston, Texas 77079

**RE: GRIMES LEASE STAGE 1 INVESTIGATION REPORT
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (SHELL) October 6, 1998 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 1 ABATEMENT PLAN". This document requests that the schedule for submission of the Stage 1 investigation report be extended to November 9, 1998.

The above referenced schedule modification is approved.

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Jennifer A. Salisbury, Secretary, NM Energy, Minerals and Natural Resources Department
Lori Wrotenberg, Director
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
Jose Jaques, Westgate Subdivision
William G. Rosch, III, Rosch & Ross

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 24, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-318

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 576
Houston, Texas 77001-0576

**RE: GRIMES LEASE STAGE 1 ABATEMENT WORK PLAN
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Shell Exploration & Production Technology Company (SHELL) documents which were submitted on behalf of SHELL by their consultant Philip Services:

- July 20, 1998 "GRIMES LEASE STAGE 1 ABATEMENT WORKPLAN, HOBBS NEW MEXICO".
- May 1998 "WESTGATE SUBDIVISION, GRIMES BATTERY AND TASKER ROAD STAGE 1 ABATEMENT PLAN (SITE ASSESSMENT INVESTIGATION)".

These documents contain SHELL's Stage 1 Abatement Plan Proposal for investigating the magnitude and extent of contamination related to a former unlined pit located in the Westgate residential subdivision at 1329 Tasker Road Hobbs, New Mexico, a former unlined pit at the adjacent Grimes Tank Battery and other areas of the Grimes Lease.

The above referenced Stage 1 Abatement Plan Proposal is **approved** with the following conditions:

1. No solvents other than laboratory grade reagent alcohol will be used for decontamination of field sampling equipment.
2. All wastes generated during the investigation will be disposed of at an OCD approved facility or in an OCD approved manner.

Mr. Wayne A. Hamilton

July 24, 1998

Page 2

3. SHELL will submit a comprehensive Stage 1 investigation report to the OCD by September 25, 1998. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
 - a. A description of all past and present investigation activities including discussion of the all past and present results (including OCD sample results), conclusions and recommendations.
 - b. Summary tables of all past and present soil/waste, soil gas and water quality sampling results including copies of recent laboratory analytical data sheets and associated QA/QC data. Laboratory analytical data sheets which have been previously submitted to the OCD need only be referenced and do not need to be included in the report.
 - c. A site map showing the location of all soil/waste sampling points, boreholes, monitor wells, soil gas survey points and all relevant site features such as pit locations and spill areas.
 - d. A map showing all oil and gas leaseholders and existing and plugged and abandoned oil and gas wells within 1 mile of the Grimes Battery.
 - e. A ground water potentiometric map created using the water table elevations from all monitor wells. The map will show the direction and magnitude of the hydraulic gradient.
 - f. Geologic/lithologic logs and well completion diagrams for each borehole and monitor well.
 - g. Geologic cross sections of the Grimes Battery pit and the Tasker Road pit areas.
 - h. Soil, soil gas and ground water isopleth maps for contaminants of concern such as benzene, BTEX and any other significant contaminants found during the investigations.
 - i. The disposition of all investigation derived wastes.
 - j. Any other information pertinent to the investigations.
4. SHELL will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Mr. Wayne A. Hamilton
July 24, 1998
Page 3

Please be advised that OCD approval does not limit SHELL to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL 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,



for Roger C. Anderson
Environmental Bureau Chief

xc: Jennifer A. Salisbury, Secretary, NM Energy, Minerals and Natural Resources Department
Lori Wrotenbery, Director, OCD
Chris Williams, OCD Hobbs District Supervisor
Randy Merker, Office of Epidemiology, NM Department of Health
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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 23, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-261

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 481
Houston, Texas 77001-0481

**RE: GRIMES LEASE CONTAMINATION
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (SHELL) April 17, 1998 "TASKER STREET SITE AND GRIMES BATTERY". This document contains SHELL's plan for resolving current site safety issues related to a former unlined pit located in the Westgate residential subdivision at 1329 Tasker Road and a former unlined pit at the Grimes Tank Battery in Hobbs, New Mexico.

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

1. During the removal of the concrete foundation, SHELL will not excavate soils from the contaminated areas. Remediation of the contaminated soils will need to be addressed under the abatement plan process
2. Shell will monitor air quality for volatile organic emissions during the removal of the concrete foundation. Shell will cease operations and immediately notify the OCD if air emissions pose a threat to public health.
3. Shell will provide the OCD with a report on all site activities by May 8, 1998. The report will include
 - a. A summary and description of all activities.
 - b. The results of the air quality monitoring.
 - c. Visual observations of the soils surrounding and underneath the foundation.
 - d. The disposition of all materials removed from the site.

Mr. Wayne A. Hamilton
April 23, 1998
Page 2

4. Shell will notify the OCD at least 24 hours in advance of the scheduled actions such that the OCD can witness the activities.

Please be advised that OCD approval does not relieve SHELL of liability should the actions fail to adequately protect public health or public safety. In addition, OCD approval does not relieve SHELL 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: Jennifer A. Salisbury, Secretary, NM Energy, Minerals and Natural Resources Department
Lori Wrotenbery, Director, OCD
Chris Williams, OCD Hobbs District Supervisor
Jose Jaques, Westgate Subdivision

Z 235 437 261

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

January 14, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-218

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 481
Houston, Texas 77001-0481

**RE: GRIMES LEASE CONTAMINATION
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (SHELL) January 14, 1997 "GRIMES LEASE, TASKER ROAD, HOBBS, NEW MEXICO SAMPLING PLAN" which was submitted on behalf of SHELL by their consultant Philip Services. This document contains SHELL's requested modification of the schedule for submission of investigation sampling data and an investigation report regarding contamination related to a former unlined pit located in the Westgate residential subdivision at 1329 Tasker Road Hobbs, New Mexico.

The above referenced schedule modification is approved.

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

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jennifer A. Salisbury, Secretary, NM Energy, Minerals and Natural Resources Department
Kathleen Garland, Acting Director
Chris Williams, OCD Hobbs District Supervisor
Jose Jaques, Westgate Subdivision
Sharon Hall, Philip Services

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

December 30, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-210

Mr. Wayne A. Hamilton
Shell E&P Technology Company
P.O. Box 481
Houston, Texas 77001-0481

**RE: GRIMES LEASE CONTAMINATION
HOBBS, NEW MEXICO**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed Shell E&P Technology Company's (SHELL) December 15, 1997 "ASSESSMENT WORK PLAN, 1329 TASKER ROAD, HOBBS, NEW MEXICO". This document contains SHELL's work plan for investigation of the magnitude of contamination related to a former unlined pit located in the Westgate residential subdivision at 1329 Tasker Road Hobbs, New Mexico.

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

1. At each sample location SHELL will obtain 2 soil/waste samples. One sample will be obtained from the asphaltic type layer located approximately 1 foot below the ground surface and the second sample will be obtained from a depth of 5 feet below the ground surface.
2. All soil/waste samples will be sampled and analyzed for all potential contaminants listed in 20 NMAC 6.2.3103 and for all toxic pollutants listed in 20 NMAC 6.2.1101 using EPA approved methods and quality assurance/quality control.
3. SHELL will submit a report on Tasker Road and Grimes Battery investigations to the OCD by January 16, 1998. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
 - a. A description of all past and present investigation activities including conclusions and recommendations.

Mr. Wayne A. Hamilton
December 30, 1997
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- b. A summary of all past and present soil/waste and water quality sampling results including copies of the laboratory analytical data sheets and associated QA/QC data.
 - c. A site map showing the location of all soil/waste sampling points, boreholes, monitor wells and relevant site features.
 - d. All available historical aerial photographs of the area.
 - e. Information on all past disposal practices on the Grimes Lease including the types of wastes disposed and the locations of all disposal and leak and spill areas.
 - f. Geologic logs and well completion diagrams for all boreholes and monitor wells.
5. SHELL will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve SHELL of liability should investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve SHELL 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
Hydrogeologist
Environmental Bureau

xc: Jennifer A. Salisbury, Secretary, NM Energy, Minerals and Natural Resources Department
William J. LeMay, Director
Chris Williams, OCD Hobbs District Supervisor
Jose Jaques, Westgate Subdivision

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

September 20, 1997

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Mr. Donnie Anderson
Altura Energy LTD (AELTD)
1017 W. Stanolind RD
Hobbs, NM 88240

Re: Shell Oil Co.
Remediation Work Plan
W.D. Grimes Battery
Hobbs, New Mexico

Dear Mr. Anderson:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the above referenced plan submitted on September 18, 1997. Due to the close proximity to nearby residences and the fact this area is planned for a future housing sub-division, the plan is hereby approved as submitted with the following additional conditions:

1. All waste removed from specific site will be disposed of at an OCD approved facility.
2. All contaminated soils shall be removed from site that exceeds TPH (418.1) levels above 100 ppm above background levels. Should AELTD not be able to achieve this requirement, a risk assessment will be provided which shows that an alternate clean-up level is protective of human health and the environment.
3. All contaminated soils shall be removed from the site that exceeds BTEX (8020) levels above non-detect (ND). Should AELTD not be able to achieve this requirement, a risk assessment will be provided which shows that an alternate clean-up level is protective of human health and the environment.
4. Upon completion of project AELTD will submit a final closure report for NMOCD approval. This report shall contain detail information and include an introduction, contaminated soil sampling and analysis section, with conclusions and recommendations. Figures, tables, disposal manifest and photos can be included and cross referenced in appendices.

Vertical and horizontal extent analytical results shall have a plot plan showing where and how samples were taken. All samples shall be taken using EPA SW-846 methods.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
~~Roger Anderson-Environmental Bureau Chief, Santa Fe, NM~~