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APPROVALS

YEAR(S):

2000-1999



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 9, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: Z-559-572-898

Mr. Anthony C. Walker
Phillips Pipe Line Company
3B10 Adams Bldg.
Bartlesville, Oklahoma 74004

**RE: GROUND WATER ABATEMENT PLAN (AP-10)
LINE NM-1-1 SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipe Line Company's (PPL) December 30, 1999 "COMPREHENSIVE REPORT ADDENDUM FOR GROUND WATER ABATEMENT PLAN AP-10, LINE NM-1-1 SITE, PHILLIPS PIPE LINE COMPANY". This document contains the results of PPL's Stage 1 Abatement Plan investigations related to soil and ground water contamination resulting from a crude oil pipeline spill at PPL's Line NM-1-1 leak site in Unit N, Section 9, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico.

The above referenced Stage 1 site investigation report is approved. Pursuant to OCD Rule 19.E.(4), the OCD requires that PPL 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 shall be submitted to the OCD Santa Fe Office by April 11, 2000 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Supervisor
Jennifer Fowler-Propst, USFWS



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 28, 1999

CERTIFIED MAIL

RETURN RECEIPT NO: Z-274-520-723

Mr. Anthony C. Walker
Phillips Pipe Line Company
3B11 Adams Bldg.
Bartlesville, Oklahoma 74004

**RE: GROUND WATER ABATEMENT PLAN (AP-10)
LINE NM-1-1 SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has reviewed Phillips Pipe Line Company's (PPL) undated document titled "STAGE 1 ABATEMENT PLAN (AP-10), LINE NM-1-1, PHILLIPS PIPE LINE COMPANY" which was received by the OCD on October 20, 1999 and September 15, 1999 "COMPREHENSIVE REPORT FOR GROUND WATER ABATEMENT PLAN AP-10, LINE NM-1-1 SITE, PHILLIPS PIPE LINE COMPANY". These documents contain the results of PPL's recent Stage 1 Abatement Plan investigations and a work plan for additional investigations related to soil and ground water contamination resulting from a crude oil pipeline spill at PPL's Line NM-1-1 leak site in Unit N, Section 9, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico.

The investigations conducted to date are satisfactory and the above referenced work plan is **approved** with the following conditions:

1. PPL shall submit a comprehensive report on all site investigations to the OCD by December 30, 1999. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain the following information:
 - a. A comprehensive description of all past and present investigation activities including conclusions and recommendations.
 - b. A site map showing the location of the spill, pipeline, excavations, monitor wells, recovery wells, soil borings and any other pertinent site features.
 - c. A geologic/lithologic log and well completion diagram for each new monitor well and soil boring.

- d. A ground water potentiometric map created using the water table elevation from each monitor well which shows the direction and magnitude of the hydraulic gradient.
 - e. Summary tables of all past and present soil and ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. Isopleth maps for contaminants of concern at the site.
 - g. A map showing all land ownership and water wells within 1 mile of the site.
 - h. The disposition of all wastes generated.
2. PPL shall 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 PPL 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 PPL of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Jennifer Fowler-Propst, USFWS



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

July 2, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-680

Mr. Anthony C. Walker
Phillips Pipeline Company
3B11 Adams Bldg.
Bartlesville, Oklahoma 74004

**RE: GROUND WATER ABATEMENT PLAN (AP-10)
LINE NM-1-1 SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has reviewed Phillips Pipeline Company's (PPL) June 2, 1999 "PUBLIC COMMENT PERIOD, GROUND WATER ABATEMENT PLAN AP-10, LINE NM-1-1 SITE, PHILLIPS PIPE LINE COMPANY" and March 24, 1999 "GROUND WATER ABATEMENT PLAN AP-10, LINE NM-1-1 SITE, PHILLIPS PIPE LINE COMPANY". These documents contains PPL's Stage 1 Abatement Plan Proposal for investigating soil and ground water contamination resulting from a crude oil spill at PPL's Line NM-1-1 leak site in Unit N, Section 9, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico.

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

1. Each monitor well shall be constructed and completed as follows:
 - a. A minimum of 15 feet of well screen shall be installed with at least 5 feet of well screen placed above the water table and 10 feet of well screen placed below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.

- d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
2. No less than 48 hours after the wells are developed, ground water from all monitor wells at each site will be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) major cations and anions, total dissolved solids (TDS), and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control (QA/QC).
 3. All wastes generated during the investigation will be disposed of at an OCD approved facility.
 4. PPL shall submit a comprehensive report on all site investigations to the OCD by September 2, 1999. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain the following information:
 - a. A comprehensive description of all past and present investigation activities including conclusions and recommendations.
 - b. A site map showing the location of the spill, pipeline, monitor wells, soil borings and any other pertinent site features.
 - c. A geologic/lithologic log and well completion diagram for each monitor well and soil boring.
 - c. A ground water potentiometric map created using the water table elevation from each monitor well which shows the direction and magnitude of the hydraulic gradient.
 - d. Summary tables of all past and present soil and ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - e. Isopleth maps for contaminants of concern at the site.
 - f. A map showing all land ownership and water wells within 1 mile of the site.
 - g. The disposition of all wastes generated.
 - h. A long term ground water monitoring plan.
 5. PPL shall 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 PPL 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 PPL of responsibility for compliance with any other federal, state or local laws and regulations.

For your information, enclosed you will find a copy of a May 24, 1999 letter that the OCD received from the United States Fish and Wildlife Service (USFWS) regarding federal obligations that may apply to PPL's proposed investigative actions at the site.

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

Sincerely,



for

Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office
Jennifer Fowler-Propst, USFWS

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PS Form 3800, April 1995