

AP - 015

APPROVALS

YEAR(S):

2002-2000



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Carol Leach

Acting Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

January 28, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004-3929-7075

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

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-15)
EAST HOBBS JUNCTION SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipe Line Company's (PPL) March 7, 2001 "PROOF OF PUBLIC NOTICE, STAGE 2 ABATEMENT PLAN, GROUND WATER ABATEMENT PLAN AP-15, EAST HOBBS JUNCTION SITE, PHILLIPS PIPE LINE COMPANY" and November 3, 2000 "STAGE 2 ABATEMENT PLAN (AP-15), EAST HOBBS JUNCTION LEAK SITE, PHILLIPS PIPE LINE COMPANY". These documents contain PPL's Stage 2 Abatement Plan Proposal for remediation of soil and ground water contamination resulting from a crude oil pipeline spill at PPL's East Hobbs Junction site in Unit N, Section 8, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. The documents also contain PPL's proof of public notice.

The Stage 2 Abatement Plan for this site was deemed administratively approvable on July 9, 2001. Subsequently, on July 19, 2001, Mr. William F. McNeill objected to the Stage 2 Abatement Plan and requested a public hearing in this matter. A division hearing (Case #12759) was set for November 1, 2001. Prior to the hearing, Mr. McNeill's attorney and PPL verbally informed the OCD that they were settling their disputed issues and the case was dismissed at the November 1, 2001 hearing. Mr. McNeill formally rescinded his appeal on January 22, 2002 and the OCD issued an order on January 25, 2002 dismissing the appeal.

Consequently, the Stage 2 Abatement Plan for the East Hobbs Junction site as contained in the above-referenced documents is approved with the following conditions:

1. In order to demonstrate containment of the plume during the implementation of the remediation project, PPL shall install 2 additional monitor wells at the locations shown on the attached figure.

2. All below-grade lines used to convey contaminated fluids shall be pressure tested to a minimum of 3 psi above operating pressure prior to operation.
3. All above ground tanks used to store any fluids other than fresh water shall be bermed to contain one and one-third times the volume of the largest tank or all interconnected tanks.
4. All wastes generated shall be disposed of at an OCD approved facility.
5. PPL shall submit the results of all remediation and monitoring activities in an annual report. The report shall be submitted to the OCD Santa Fe Office by April 1 of each year with a copy provided to the OCD Hobbs District Office. The report shall contain the following:
 - a. A description of all soil and ground water remediation and monitoring activities which have occurred during the previous calendar year including conclusions and recommendations.
 - b. Quarterly water table potentiometric maps showing the location of pipelines, excavations, spills, monitor wells, recovery wells, vapor extraction wells, air sparge wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - c. Quarterly isopleth maps for contaminants of concern.
 - d. Summary tables of all past and present soil and ground water quality sampling results including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - e. Summary tables of the quarterly amount of product recovered from each recovery well and the total volume recovered to date.
 - f. Summary tables for each soil vapor extraction well of the quarterly mass of hydrocarbon contaminants recovered from the well and the total mass of hydrocarbons recovered to date.
 - g. The disposition of all wastes generated.
 - h. The results of any below-grade line testing.
6. 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.
7. Pursuant to OCD Rule 19.B.(4), the OCD will not consider abatement complete until 8 consecutive quarterly samples from all compliance stations meet the standards of Rule 19.B.(1) and (2).

Please be advised that OCD approval does not relieve PPL of responsibility if the abatement plan fails to adequately remediate or monitor contamination related to PPL's activities. 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, please contact Bill Olson at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a large initial "R" and "A".

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

cc w/attachment: Chris Williams, OCD Hobbs District Supervisor
William McNeill

LEGEND

- MW-1
Existing Monitor Well
Converted to SVE Well
- PSP-1
Proposed Air Sparge Well
- PSVE-1
Proposed SVE Well



HIGGINS AND ASSOCIATES, L.C.

Project No. 11/1/00

Date User Generated 11/1/00

Date Data Collected 11/1/00

Author CH

Checker CH

Designer DG

Client East Hobbs Junction

Project Phillips Pipe Line

Scale 1:100 DWG

Sheet 1 of 1

Remedial System Layout

Additional monitor wells



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

July 9, 2001

CERTIFIED MAIL

RETURN RECEIPT NO. 3771-7439

Mr. William F. McNeill
P.O. Box 1068
Hobbs, New Mexico 88241

**RE: STAGE 2 ABATEMENT PLAN PROPOSAL
PHILLIPS – EAST HOBBS JUNCTION SITE
GROUND WATER ABATEMENT PLAN (AP-15)**

Dear Mr. McNeill:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipe Line Company's (PPL) Stage 2 Abatement Plan for the remediation of soil and ground water contamination at PPL's East Hobbs Junction site located in the Unit N, Section 8, Township 19 South, Range 38 East, NMPM, Lea County, 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 and the proposed conditions of approval.

An objection to PPL's Stage 2 Abatement Plan was filed by you. If your objections to the plan have not been addressed and you wish to have a hearing on the merits of the abatement plan, please submit a request for hearing by July 27, 2001. 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 July 27, 2001, then the abatement plan will be administratively approved.

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

Sincerely,

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

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

attachment

cc with attachment: Chris Williams, OCD Hobbs District Office
Anthony C. Walker, Phillips Pipe Line Company



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 9, 2001

CERTIFIED MAIL
RETURN RECEIPT NO:

DRAFT

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

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-15)
EAST HOBBS JUNCTION SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipe Line Company's (PPL) March 7, 2001 "PROOF OF PUBLIC NOTICE, STAGE 2 ABATEMENT PLAN, GROUND WATER ABATEMENT PLAN AP-15, EAST HOBBS JUNCTION SITE, PHILLIPS PIPE LINE COMPANY" and November 3, 2000 "STAGE 2 ABATEMENT PLAN (AP-15), EAST HOBBS JUNCTION LEAK SITE, PHILLIPS PIPE LINE COMPANY". These documents contain PPL's Stage 2 Abatement Plan Proposal for remediation of soil and ground water contamination resulting from a crude oil pipeline spill at PPL's East Hobbs Junction site in Unit N, Section 8, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. The documents also contain PPL's proof of public notice.

The Stage 2 Abatement Plan for the East Hobbs Junction site as contained in the above-referenced documents is approved with the following conditions:

1. In order to demonstrate containment of the plume during the implementation of the remediation project, PPL shall install 2 additional monitor wells at the locations shown on the attached figure.
2. All below-grade lines used to convey contaminated fluids shall be pressure tested to a minimum of 3 psi above operating pressure prior to operation.

DRAFT

3. All above ground tanks used to store any fluids other than fresh water shall be bermed to contain one and one-third times the volume of the largest tank or all interconnected tanks.
4. All wastes generated shall be disposed of at an OCD approved facility.
5. PPL shall submit the results of all remediation and monitoring activities in an annual report. The report shall be submitted to the OCD Santa Fe Office by April 1 of each year with a copy provided to the OCD Hobbs District Office. The report shall contain:
 - a. A description of all soil and ground water remediation and monitoring activities which have occurred during the previous calendar year including conclusions and recommendations.
 - b. Quarterly water table potentiometric maps showing the location of pipelines, excavations, spills, monitor wells, recovery wells, vapor extraction wells, air sparge wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - c. Quarterly isopleth maps for contaminants of concern.
 - d. Summary tables of all past and present soil and ground water quality sampling results including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - e. Summary tables of the quarterly amount of product recovered from each recovery well and the total volume recovered to date.
 - f. Summary tables of the mass of hydrocarbon contaminants recovered from each soil vapor extraction well on a quarterly basis and the total mass recovered to date.
 - g. The disposition of all wastes generated.
6. 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.
7. Pursuant to OCD Rule 19.B.(4), the OCD will not consider abatement complete until 8 consecutive quarterly samples from all compliance stations meet the standards of Rule 19.B.(1) and (2).

Please be advised that OCD approval does not relieve PPL of responsibility if the abatement plan fails to adequately remediate or monitor contamination related to PPL's activities. 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, please contact Bill Olson at (505) 476-3491.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

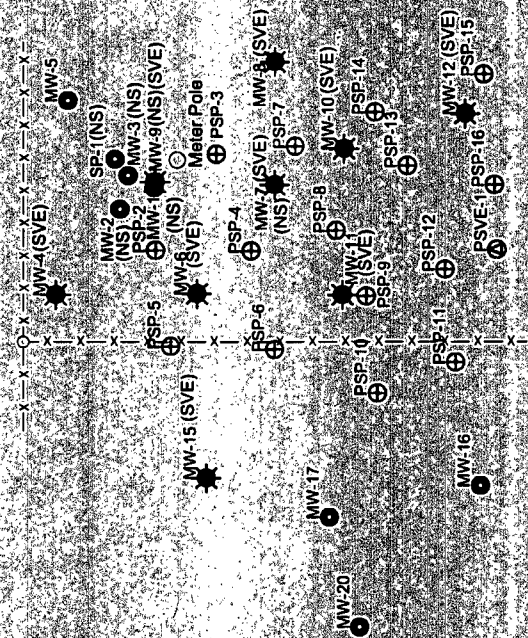
RCA/wco

cc w/attachment: Chris Williams, OCD Hobbs District Supervisor
William McNeil

DRAFT

LEGEND

- MW-1 Existing Monitor Well
- PSP-1 Converted to SVE Well
- PSVE-1 Proposed Air Sparge Well
- PSVE-2 Proposed SVE Well



HIGGINS AND ASSOCIATES, L.L.C.

Project No. 11/1/00

Date Map Generated: 11/1/00

Date Data Collected: 11/1/00

Figure 1

Author: CH

Checked: CH

Decided: DG

Remedial System Layout

Client: Phillips Pipe Line

Location: East Hobbs Junction

ACAD File: 371-17/figure_RSL_11-1-00.DWG

New Mexico

additional monitor wells



MW-13

MW-19

PSP-19

PSP-18

MW-18(SVE)

PSP-20

MW-14(SVE)

PSP-17

MW-12(SVE)

PSP-15

PSVE-1

PSP-16

PSP-12

PSP-11

PSP-10

PSP-9

MW-10(SVE)

PSP-14

PSP-13

MW-8(SVE)

PSP-7

MW-3(SVE)

PSP-6

PSP-4

MW-2(SVE)

PSP-5

MW-1(SVE)

PSP-3

MW-15(SVE)

MW-17

MW-20

MW-16

MW-13

MW-19



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenberg
Director
Oil Conservation Division

September 5, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-3556

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

**RE: GROUND WATER ABATEMENT PLAN (AP-15)
EAST HOBBS JUNCTION SITE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipe Line Company's (PPL) July 6, 2000 "GROUND WATER ABATEMENT PLAN AP-15, EAST HOBBS JUNCTION, PHILLIPS PIPE LINE COMPANY" and accompanying July 5, 2000 "COMPREHENSIVE REPORT FOR GROUNDWATER ABATEMENT PLAN, EAST HOBBS JUNCTION SITE, PHILLIPS PIPE LINE COMPANY". These documents contain 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 East Hobbs Junction site in Unit N, Section 8, 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 November 5, 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
Bill McNeil



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 4, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: Z-559-572-892

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

**RE: GROUND WATER ABATEMENT PLAN (AP-15)
EAST HOBBS JUNCTION LINE**

Dear Mr. Walker:

The New Mexico Oil Conservation Division (OCD) has completed a review of Phillips Pipeline Company's (PPL) December 15, 1999 "PUBLIC COMMENT PERIOD, GROUND WATER ABATEMENT PLAN AP-15, EAST HOBBS JUNCTION SITE, PHILLIPS PIPE LINE COMPANY" and September 15, 1999 "GROUND WATER ABATEMENT PLAN, EAST HOBBS JUNCTION LEAK SITE, PHILLIPS PIPE LINE COMPANY". These documents contain PPL's Stage 1 Abatement Plan Proposal and proof of public notification for investigating soil and ground water contamination resulting from a crude oil spill at PPL's East Hobbs Junction Line leak site in Unit N, Section 8, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico.

The OCD received no public comments in response to the public notification. The above referenced Stage 1 Abatement Plan Proposal is **approved** with the following conditions:

1. The annular space above the bentonite plug shall not be backfilled with cuttings. The remainder of the hole from the bentonite plug to the surface shall be grouted to the surface with cement containing 3-5% bentonite
2. PPL shall wait at least 24 hours after the monitor wells have been developed to purge and sample the ground water.
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 March 10, 2000. 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 and remediation activities including the prior soil excavations.
 - b. A site map showing the location of the spill, pipeline, excavations, 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.
 - 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.
 - i. A long term ground water monitoring plan.
5. PPL shall notify the OCD at least 48 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 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