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APPROVALS

YEAR(S):



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

April 9, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-4249

Mr. Ray Glover BP Pipeline North America, Inc. 801 Warrenville Rd. Lisle, Illinois 60532

RE:

CASE # 3R0375 AND #3R0376 REMEDIATION WORK PLANS

ARCO BISTI PUMP STATION AND SHIPROCK PUMP STATION

Dear Mr. Glover:

The New Mexico Oil Conservation Division (OCD) has reviewed BP Pipeline North America, Inc.'s (BP) February 2, 2001 "REMEDIAL ACTION WORK PLANS, FORMER ARCO PIPE LINE, LINE 90 BISTI AND SHIPROCK PUMP STATIONS" and accompanying April 2000 "REMEDIAL ACTION WORK PLAN FOR CRUDE OIL IMPACTED SOIL FORMER ARCO PIPELINE SHIPROCK PUMP STATION, ARIZONA" and April 2000 "REMEDIAL ACTION WORK PLAN FOR CRUDE OIL IMPACTED SOIL FORMER ARCO PIPELINE BISTI PUMP STATION, NEW MEXICO" which were submitted on behalf of BP by their consultant URS Greiner Woodward Clyde. This document contains BP's proposed work plan for remediation of contaminated soils at the Bisti Crude Pump Station located in Unit J, Section 17, Township 26 North, Range 12 West, San Juan County, New Mexico and the Shiprock Crude Pump Station located in Unit B, Section 14, Township 29 North, Range 18 West, San Juan County, New Mexico.

The OCD above referenced work plans are approved with the following conditions:

- 1. All soil samples shall be obtained and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX) and total petroleum hydrocarbons using EPA approved methods and quality assurance/quality control procedures.
- 2. All wastes generated shall be disposed of at an OCD approved facility.

- 3. BP shall submit a report on the remedial actions to the OCD by June 9, 2001. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Aztec District Office and shall contain:
 - a. A description of all investigation and remediation activities conducted including conclusions and recommendations.
 - b. A map showing spill areas, excavated areas and sample locations in relation to other relevant site features..
 - c. Tables containing the results of all soil sampling data.
 - d. Copies of the laboratory analytical results of all soil sampling including the quality assurance/quality control data.
 - e. The disposition of all wastes generated at the site.
- 4. BP 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 relieve BP of reponsibility if contamination exists which is beyond the scope of the work plan, or if the plan fails to adequately remediate contamination related to BP's activities. In addition, OCD approval does not relieve BP of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc: Denny Foust, OCD Aztec District Office

Colin Wasteneys, URS Greiner Woodward Clyde