

CORRESPONDENCE

MISC.

Martin, Ed

From: Jerry Brian [jbrian@etgi.cc]
Sent: Wednesday, January 28, 2004 8:10 AM
To: Martin, Ed
Cc: Britt Byerly
Subject: Re: TNM 96-16

Hey Ed,

Thanks for your response.

The legals for TNM 96-16 are SW4 NE4 S5, T17S,R37E.

I would appreciate the opportunity to visit the site with you.

JB

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

From: Martin, Ed
To: 'Jerry Brian'
Sent: Tuesday, January 27, 2004 11:33 AM
Subject: RE: TNM 96-16

Hey, Jerry. Sorry for the delay. Would you mind verifying the 1/4,1/4, Sec, Twp and Rng for this site. The data I have does not seem to agree with the map included in the closure report from Whole Earth Environmental. Nor does it agree with their description of the location in relation to the Lovington well field.

I will be in the neighborhood during the week of February 16 and would like to take a look at this one.

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

From: Jerry Brian [mailto:jbrian@etgi.cc]
Sent: Friday, December 26, 2003 9:11 AM
To: Ed Martin
Cc: Britt Byerly; Larry Johnson
Subject: TNM 96-16

Hi Ed,

When you get a chance, I need to visit with you regarding Link Site TNM 96-16.

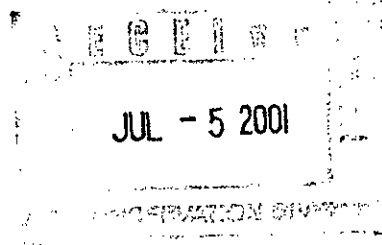
I need to verify a request for closure on this site and to determine what we need to do to bring this to closure.

Thanks,
JB

1/28/2004

July 2, 2001

Mr. William C. Olson
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505



RE: TNM 96-16 Release Site
ETGI Project No. EOT2066C

Dear Mr. Olson:

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Pipeline, LP, submits the following request for the closure of the TNM 96-16 site in the SW ¼, NE ¼, Section 5, T-17-S, R-37-E, in Lea County, New Mexico.

In a previous letter dated April 9, 2001, Mr. Ken Dutton of ETGI's Hobbs, New Mexico office requested that the annual monitoring of groundwater be changed to a schedule of quarterly sampling; historical information from EOTT personnel had led us to believe that four annual samples were needed to close this site. In a conversation with Mr. Roger Anderson on June 22, 2001, he confirmed that sites required to do annual monitoring of groundwater are to submit two clean annual samples in order to satisfy this condition. This site has had two consecutive annual samples taken on December 3, 1999 and November 28, 2000, both of which were below New Mexico Water Quality Control Commission (NMWQCC) standards for the contaminants of concern (COC). The Annual Monitoring Report submitted in March, 2000, erroneously stated that the December 3rd sample was taken in 2000 when, in fact, it was taken in 1999 as seen on the actual lab result included in that same report. Please refer to the attached Table 1 for accurate analytical results from the above referenced sample dates.

In light of this further guidance from Mr. Anderson, ETGI respectfully requests that the NMWQCC disregard our earlier request for quarterly sampling and recommend closure on this site.

If further information or documentation is needed to grant this request, please call me at (915) 522-1139 or via email at amoore@etgi.cc

Sincerely,
Environmental Technology Group, Inc.

C. Ann Moore

C. Ann Moore
Staff Regulatory Specialist

cc: New Mexico Oil Conservation division, Hobbs District Office
Wayne Brunette, EOTT Energy Pipeline, LP
Ken Dutton, ETGI Hobbs Office
ETGI Midland Files

Table 1

GROUND WATER CHEMISTRY

EOTT ENERGY CORPORATION

TNM 96-16

LEA COUNTY, NEW MEXICO

ETGI Project # EOT 2066C

All concentrations are in mg/L

SAMPLE DATE	SAMPLE LOCATION	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL- BENZENE	M,P- XYLENES	O- XYLENES
02/03/99	MW - 1	<0.001	<0.001	<0.001	<0.001	<0.001
11/28/00	MW - 1	<0.001	<0.001	<0.001	<0.001	<0.001

OIL CONSERVATION DIV.
01 APR 16 PM 3:16



April 9, 2001

Mr. William C. Olson
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Dr.
Santa Fe, NM 87505

RE: TNM 96-16 Release Site

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) requests approval to revise the ground water monitoring plan for TNM 96-16 Release Site in the SW $\frac{1}{4}$, NE $\frac{1}{4}$, Section 5, Township 17 South, Range 37 East, in Lea County, New Mexico.

ETGI was informed by Lennah Frost, formerly of EOTT Pipeline Corporation, ground water monitoring was to be scheduled on an annual basis for a period of four consecutive years. The analytical results from the monitoring well at this location are below New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored contaminants of concern (COC).

Please find attached Table 1, a summary of analytical testing results from December 1999 to November 2000. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period. Based on these results ETGI recommends this site to be monitored on a quarterly basis, and if after four consecutive quarterly sampling events the analytical results have remained below NMWQCC standards, this site will be recommended for closure.

Sincerely,

Ken Dutton
New Mexico Operations Manager

Cc: New Mexico Oil Conservation Division, Hobbs District Office
Jerry Nickel, ETGI- Midland Office

12
11/5

NSID
pwr map

ANNUAL MONITORING REPORT

**EOTT PIPELINE COMPANY
TNM 96-16
LEA COUNTY, NEW MEXICO**

LR 95

RECEIVED

MAY 09 2001

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

PREPARED FOR:

**EOTT PIPELINE COMPANY
5805 EAST HIGHWAY 80
MIDLAND, TEXAS 79701**

PREPARED BY:

**ENVIRONMENTAL TECHNOLOGY GROUP, INC.
2540 WEST MARLAND
HOBBS, NEW MEXICO 88240**

APRIL 2001

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INTRODUCTION

Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corp. (EOTT), prepared this annual report in compliance with the New Mexico Oil Conservation Division (OCD) letter of May 1998, requiring submittal of an annual report by April 1 of each year. The report presents the results of the annual ground water monitoring event only. For reference, the Site Location Map is provided as Figure 1.

Ground water monitoring was conducted during the annual event in calendar year 2000 to assess the levels and extent of dissolved phase constituents. The ground water monitoring event consisted of measuring static water levels in the monitoring well and purging and sampling of each well exhibiting sufficient recharge.

FIELD ACTIVITIES

The site monitoring well was gauged and sampled on November 28, 2000. During the sampling event, the monitoring well, designated to be sampled, was purged of approximately 3 well volumes of water or until the well was dry using a PVC bailer or electrical Grundfos Pump. Ground water was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were stored in clean, glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of by Pate Trucking, Hobbs, New Mexico, utilizing a licensed disposal facility (OCD AO SWD-730).

GROUND WATER GRADIENT

Location of the monitoring well as measured on November 28, 2000, is depicted on Figure 2, the Site Ground Water Gradient Map. Ground water elevation contours are unknown due to the existence of one monitoring well on-site which precludes the data necessary for measurement of ground water elevation. The depth to ground water as measured from the top of the well casing, was 59.15 feet for the shallow alluvial aquifer.

LABORATORY RESULTS

Ground water samples obtained during the sampling events were hand delivered to Environmental Laboratory of Texas, Midland, Texas, for determination of benzene, toluene, ethyl benzene and total xylenes (BTEX) concentrations by EPA Method SW846-8021B. The ground water chemistry data are provided as Table 2 and the Laboratory Reports are provided as Appendix A.

Laboratory results for all of the on-site ground water samples, obtained during the calendar year 2000 monitoring period, indicated that Benzene and BTEX concentrations were below method detection limits for the on-site monitoring well.

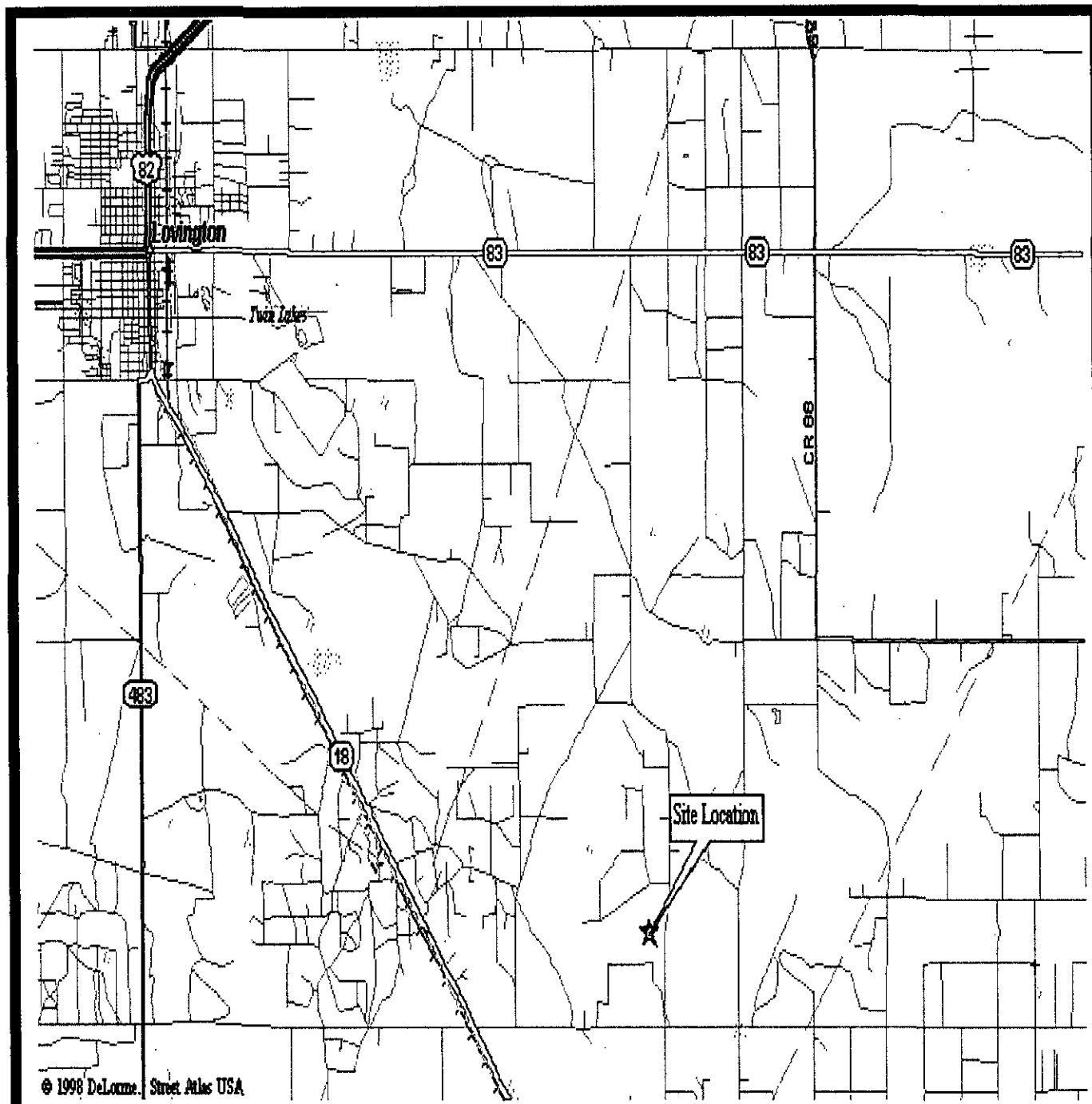
SUMMARY

This report presents the results of monitoring activities for the annual monitoring period of calendar year 2000. Ground water elevation contours are unknown due to the existence of one monitoring well on-site which precludes the data necessary for measurement of ground water elevation.

Laboratory results for all of the on-site ground water samples, obtained during the calendar year 2000 monitoring period, indicated that Benzene and BTEX concentrations were below method detection limits for the on-site monitoring well.

ETGI recommends that the site annual sampling status be upgraded to quarterly sampling events. If, after four consecutive sampling events the ground water concentrations remain below regulatory standards, a closure request will be submitted to the OCD.

FIGURES



© 1998 DeLorme, Street Atlas USA

FIGURE

1

Not To Scale

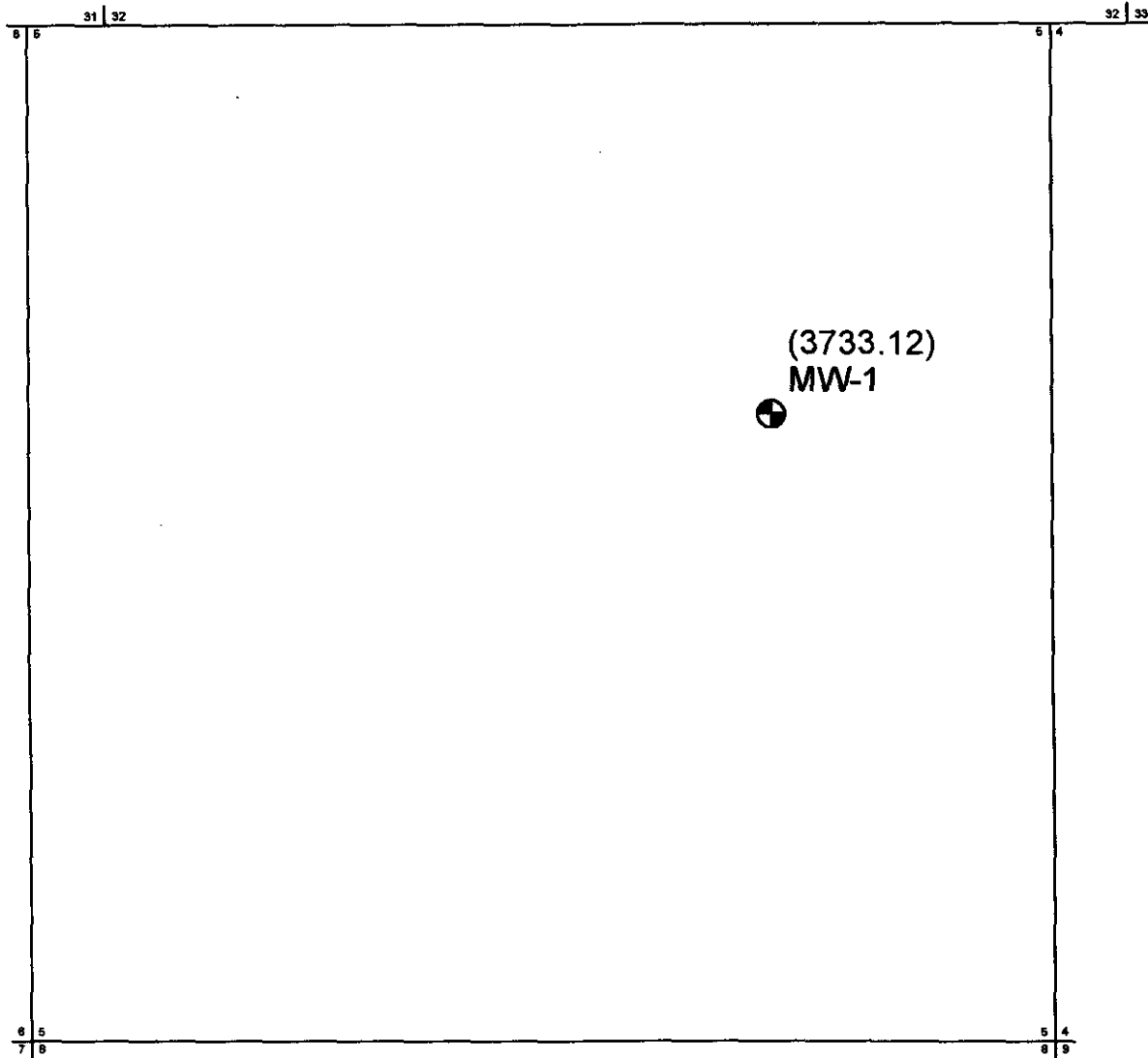
Site Location Map

**EOTT Energy Corp.
TNM 96-16
Lea County, NM**

**Environmental
Technology
Group, Inc.**

03 - 08 - 00 RS

ETGI Project # EOT2066C



LEGEND:

⊕ KEI Monitoring Well Location

(3733.12) Groundwater Elevation (in feet)

**Figure 2
Site Map**

**EOTT Energy Corp.
TNM 96-16
Lea County, NM**



**Environmental Technology
Group, INC.**

Scale: 1" = 80'	Prep By: RS	Checked By: CR
November 28, 2000	ETGI Project # EOT2068C	

TABLES

TABLE 1

**GROUND WATER ELEVATION
ANNUAL REPORT**

**EOTT ENERGY CORPORATION
TNM 96-16
LEA COUNTY, NEW MEXICO
ETGI PROJECT # EOT2066C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	11/28/00	3,792.27	-	59.15	0.00	3,733.12

TABLE 2

**GROUND WATER CHEMISTRY
ANNUAL REPORT**

**EOTT ENERGY CORPORATION
TNM 96-16
LEA COUNTY, NEW MEXICO
ETGI PROJECT # EOT 2066C**

All concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL- BENZENE	M,P- XYLENES	O- XYLENES
MW - 1	12/3/00	<0.100	<0.100	<0.100	<.0100	<0.100

GROUND WATER CHEMISTRY ANNUAL REPORT

All concentrations are in mg/L

[illegible]

APPENDIX

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-397-4701

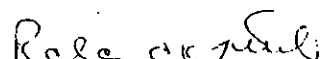
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 0.5 deg. C
Project #: EOT 2066C
Project Name: TNM 96-16
Project Location: Lea County, N.M.

Sampling Date: 11/28/00
Receiving Date: 12/02/00
Analysis Date: 12/03/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
34582	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
34583	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001

%IA	95	102	100	103	98
%EA	96	102	100	104	98
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B, 5030


Raland K. Tuttle

12-4-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: BETH ALDRICH
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310

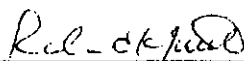
Sample Type: Water
Sample Condition: Intact/Iced/ HCl/-2.0 deg C
Project #: EOT 2066C
Project Name: TNM 96-16
Project Location: Lea County, N.M.

Sampling Date: 12/29/00
Receiving Date: 12/30/00
Analysis Date: 01/03/01

ELT#	FIELD CODE	GRO C6-C10 mg/L	DRO >C10-C28 mg/L
35768	MW 1	<0.50	<0.50

% IA	92	93
%EA	96	98
BLANK	<0.50	<0.50

Methods: EPA SW 846-8015M GRO/DRO


Roland K. Tuttle

1-04-01
Date

**4600 West Wall
Midland, TX 79703
Tel (915) 522-1139
Fax (915) 520-4310**

EOTT ENERGY CORP

OTT ENERGY CORP
East Business 20
TX 79702
(915) 687-3400
(915) 682-2781

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST
(Circle or Specify Method No.)

Project Manager:	BETH ANDREICH	EOTT Leak Number:
Project Name:	TVM 96-16	ETGI Project Number:
Project Location:	LEA COUNTY NM	Sampler Signature:

[illegible][illegible]

Relinquished by: <i>Amor Linares</i>	Date: 12-29-00	Time: 4:00	Received by: <i>Donna Linares</i>	Date: 12-29-00	Time: 4:00
Relinquished by: <i>Donna Linares</i>	Date: 12-30-00	Time: 12:30	Received at Lab by: <i>Donna Linares</i>	Date: 12-30-00	Time: 12:30

REMARKS: FAX RESULTS: 1/10/88
/ MAX RESULTS: 1/10/11
INVOICE: 1/10/11
REF - 2.0°C

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

FEDERAL EXPRESS
AIR BILL # 8170 0342 3660

March 30, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

RE: ANNUAL GROUND WATER MONITORING REPORTS

Dear Mr. Olson:

Attached please find the 2000 Annual Groundwater Monitoring Reports for the following sites:

Monument #18
Monument #17
Monument #2
Monument #15
TNM-97-17
TNM-97-18
TNM-98-05A
TNM-96-16
TNM-97-14

Monument #10
TNM-97-16 (Becky Jo Doom site)
HDO-90-23
SPS-11
TNM-98-02
TNM-98-S01
TNM-97-23
TNM-95-10 (Saunders)
TNM-97-04 (Townsend)

I hope all meets with OCD requirements for closure of the site but if you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: Environmental File



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 29, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-740

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: REMEDIATION REPORT
TNM-96-16 SITE

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has completed a review of EOTT Energy Pipeline Limited Partnership's (EOTT) November 3, 1999 "REMEDIATION REPORT, TNM-96-16, LEA COUNTY, NEW MEXICO" and September 10, 1999 "CLOSURE REPORT - TNM-96-16, LEA COUNTY, NEW MEXICO". These documents contain the results of EOTT's investigation and remediation of soil and ground water contamination resulting from a crude oil spill at EOTT's 96-16 site. The document also contain recommendations for annual ground water monitoring at the site.

The above referenced ground water monitoring plan is **approved** with the following conditions:

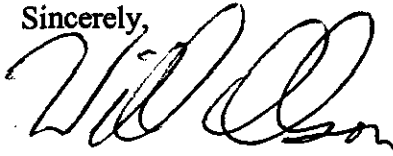
1. During each sampling event, ground water from all monitor wells shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX) using EPA approved methods and quality assurance/ quality control (QA/QC) procedures.
2. All wastes generated shall be disposed of at an OCD approved facility.
3. EOTT shall submit the results of the ground water monitoring actions to the OCD in an annual report. The report shall be submitted to the OCD Santa Fe Office by November 1 of each year with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A map showing the location of spills, excavated areas, monitor wells, recovery wells, and any other pertinent site features.

- c. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past calendar year.
 - d. The disposition of all wastes generated.
4. EOTT 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 EOTT to the proposed work plan should the actions fail to adequately monitor contamination related to EOTT's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT 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: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental, Inc.

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

NOV - 5 1999

VIA CERTIFIED MAIL
RETURN RECEIPT #Z470 651 240

November 3, 1999

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

RE: REMEDIATION REPORT
TNM-96-16
LEA COUNTY, NEW MEXICO

Dear Mr. Olson:

I understand that Mr. Mike Griffin with Whole Earth Environmental, Inc. discussed your concerns on the above captioned site with you. Mr. Griffin has responded to your letter dated October 14, 1999 and I am forwarding a copy of his letter to you.

Be assured that EOTT is on top of the situation. We are holding Whole Earth Environmental, Inc. responsible for the drilling contractor backfilling both the monitor well and the recovery well with drill cuttings. EOTT is also holding Whole Earth accountable for properly plugging both wells in accordance with the OCD's approval of our work plan dated July 22, 1999.

I hope this adequately explains your requests for information. EOTT used Whole Earth on a test basis on this site. We have decided not to use their "liner" technology on other sites.

I hope all meets with OCD approval. If you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: Environmental File
NMOCD Hobbs District Office
Whole Earth Environmental, Inc.



Whole Earth Environmental, Inc.

19606 San Gabriel, Houston, Texas 77084
281/492-7077 • Fax: 281/646-8996

October 26, 1999

EOTT Energy Pipeline Limit Partnership
P.O. Box 1660
Midland, Tx. 79702

Attn: Lennah Frost

Dear Lennah:

I'm in receipt of Mr. Olson's letter of October 14th regarding the TNM-96-16 Remediation Report. In it, Mr. Olson requested the following additional information:

Request

The report shows that drill cuttings were used as backfill in the annular space above the bentonite seal when constructing both the monitor well and the recovery well. The OCD's July 22, 1999 approval of the work plan required that the annular space shall be grouted to surface with a cement grout containing 3-5% bentonite and shall not be backfilled with drill cuttings. As the wells are now constructed they could act as a direct conduit to ground water if future spills occur in this area. Please explain why the OCD's well construction requirements were not met.

Answer

Whole Earth Environmental reviewed the OCD's approval requirements with the drilling contractor immediately prior to the actual drilling. We did not supervise the backfilling of the annulus. Upon final closure of the site both wells will be reamed and cemented to surface in accordance with the OCD's July 22, 1999 approval.

Request

The work plan stated that a 30 mil liner was to be installed in the excavation. However, according to the report a 20 mil liner was actually installed. Please explain why EOTT deviated from the work plan approved by the OCD.

Answer

The 30 mil liner specification contained within the work plan was an error. Whole Earth apologizes for any confusion this error may have caused.



Page 2

Request

The first page of the section titled "Field Analytical" contains the results of 20 soil analyses. However, there is no information regarding what these samples represent. Please clarify what these samples represent.

Answer

The three reports dated June 28th through July 1st are the results of field testing of the soils at various depths during the excavation process. The report dated August 12th contains the results of field testing of soils within the mixing zone prior to being deposited within the pit.

I do hope that this will help in clarifying the closure approval. I do plan in being in the Midland area next week and look forward to the opportunity of meeting with you. If in the interim you've any questions or recommended changes, please don't hesitate to call.

Warmest regards,

Mike Griffin
President
Whole Earth Environmental, Inc.



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 14, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-717

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: REMEDIATION REPORT
SITE TNM-96-16

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) September 10, 1999 "CLOSURE REPORT - TNM-96-16, LEA COUNTY, NEW MEXICO". This document contains the results of EOTT's investigation and remediation of soil and ground water contamination resulting from a crude oil pipeline spill at EOTT's TNM-96-16 site. The document also contains recommendations for additional ground water monitoring at the site.

The OCD has the following comments and requests for information regarding the above referenced report:

1. The report shows that drill cuttings were used as backfill in the annular space above the bentonite seal when constructing both the monitor well and the recovery well. The OCD's July 22, 1999 approval of the work plan required that the annular space shall be grouted to the surface with a cement grout containing 3-5% bentonite and shall not be backfilled with drill cuttings. As the wells are now constructed they could act as a direct conduit to ground water if future spills occur in this area. Please explain why the OCD's well construction requirements were not met.
2. The work plan stated that a 30 mil liner was to be installed in the excavation. However, according to the report a 20 mil liner was actually installed. Please explain why EOTT deviated from the work plan approved by the OCD.
3. The first page of the section titled "Field Analytical" contains the results of 20 soil analyses. However, there is no information regarding what these samples represent. Please clarify what these sample analyses represent.

Please supply the above information to the OCD Santa Fe Office by November 1, 1999 with a copy provided to the OCD Hobbs District Office. Submission of this information will allow the OCD to complete a review of the EOTT's report on the TNM-96-16 site.

The OCD would also like to correct an error in the OCD's July 22, 1999 approval letter to EOTT. The first paragraph of the OCD's letter erroneously refers to EOTT's July 1, 1999 "DENTON GATHERING AREA LEAKSITE - DARR ANGEL RANCH, SEC 11, T-15-S, R-37-E, LEA COUNTY, NEW MEXICO" document. This reference is incorrect. The document that should have been cited was EOTT's July 1, 1999 "EOTT ENERGY PARTNERS, SITE 96-16 REMEDIATION PROTOCOL". Please note this correction for your records. The OCD apologizes for any confusion this error may have caused.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson", written in a cursive style.

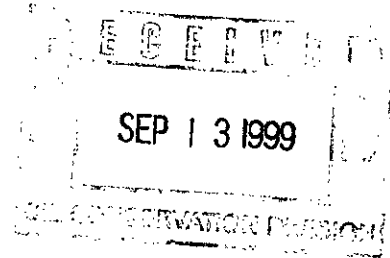
William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental, Inc.

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

VIA CERTIFIED MAIL
RETURN RECEIPT #Z470651630



September 10, 1999

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

RE: CLOSURE REPORT - TNM-96-16
LEA COUNTY, NEW MEXICO

Dear Mr. Olson:

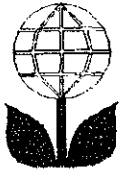
Attached please find the closure report for the above captioned leaksite. A copy of this report has been submitted to the NMOCD in Hobbs also.

I hope all meets with OCD approval. If you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,

Lennah Frost
Sr. Environmental Engineer

cc: Al Hugh - Environmental File
NMOCD Hobbs District Office



**Whole Earth
Environmental**

19606 San Gabriel
Houston, TX 77084
Phone: (281) 492-7077
Fax: (281) 646-8996

FAX COVER PAGE

To: Bill Olson

From: Mike Griffin

Company: NMOC

Company: Whole Earth Environmental, Inc.

Fax No.: (505) 827-8177

Pages including cover sheet: 2

Subject:

Message:

Date: 9 12 199



To: Donna Williams
Bill Olson

From: Mike Griffin / Whole Earth Environmental

Date: August 2, 1999

Subject: EOTT Site 96-16 Recovery and Monitor Well Drilling Schedule

In accordance with Mr. Olson's Provisional approval to the Whole Earth remediation protocol PR-17A Submitted July 1, 1999 for the EOTT Energy Partners site, 96-16, we are advising you that we are planning to schedule the drilling of a source well and a recovery well on Tuesday, August 10th.

We anticipate that the project will take two days. If the schedule slips, we will notify you immediately by phone upon discovery.

If you need to get in touch with us, you may call us at the following numbers:

Office: (800) 854-4358

Mobil: (713) 412-1342 Elliott

Mobil: (281) 844-6975 Mike

We look forward to seeing you on the 10th.

cc: Lennah Frost



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES

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

July 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-685

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: REMEDIATION PLAN
SITE 96-16**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) July 1, 1999 "DENTON GATHERING AREA LEAKSITE - DARR ANGEL RANCH, SEC 11, T-15-S, R-37-E, LEA COUNTY, NEW MEXICO" which was submitted on behalf of EOTT by their consultant Whole Earth Environmental, Inc. This document contains EOTT's proposed work plan for investigation and remediation of soil and ground water contamination resulting from a crude oil spill at EOTT's 96-16 site.

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

1. Due to the use of ground water as a municipal water supply in this area, contaminated soils in excess of the OCD's guidelines shall be excavated to the extent practicable.
2. The OCD defers comment on the results of the modeling until the extent of contamination is determined and the model is calibrated using actual site field data.
3. The recovery well shall be installed directly downgradient and as close as possible to the source of the leak.
4. The vertical extent of soil contamination shall be determined during the drilling of the recovery well. Soil samples shall be obtained at five foot intervals starting at the elevation of the bottom of the excavation and continuing to the top of the water table. The soil samples will be sampled and analyzed for concentrations of total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene and xylene (BTEX) using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
5. If ground water is contaminated in excess of New Mexico Water Quality Control Commission (WQCC) standards, EOTT shall install a sufficient number of monitor wells to determine the extent of contamination.

Z 274 520 685

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PS Form 3800, April 1995

6. EOTT shall complete all monitor and recovery wells as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen 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 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.
 - e. A concrete pad and locking well cover shall be placed around the well at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
7. No less than 48 hours after the wells are developed, ground water from all monitor wells shall be purged, sampled and analyzed for concentrations of BTEX, polycyclic aromatic hydrocarbons (PAH) and **WQCC metals** using EPA approved methods and QA/QC procedures.
8. A 5 point composite verification sample shall be obtained from each 3 foot lift of remediated material placed onto the liner system. The soil samples will be sampled and analyzed for concentrations of TPH and BTEX using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
9. All below grade lines used for conveying fluids from recovery wells to the above ground storage tank shall be pressure tested to 3 psi above operating pressure prior to operation.
10. All recovered oil shall be stored in a closed tank and the tank shall be bermed to contain one and one-third times the volume of the largest tank or all interconnected tanks.
11. All wastes generated shall be disposed of at an OCD approved facility.
12. EOTT shall submit the results of the soil remediation and investigation actions to the OCD in a comprehensive report. The report shall be submitted to the OCD Santa Fe Office by September 24, 1999 with a copy provided to the OCD Hobbs District Office and shall include:
 - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.

- b. A geologic/lithologic log and well completion diagram for each monitor well.
- c. A water table potentiometric map showing the location of spills, excavated areas, monitor wells, recovery wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
- d. Isopleth maps for contaminants of concern which were observed during the investigations.
- e. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
- f. The disposition of all wastes generated.
- g. The results of any below grade line testing.
- h. Specific as built construction information on the liner system.
- i. The results of any below grade line testing.
- j. A plan for addressing soil contamination which remains in place between the liner system and the ground water.

13. EOTT 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 EOTT to the proposed work plan should the investigation actions fail to adequately define or remediate contamination related to EOTT's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT 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: Chris Williams, OCD Hobbs District Office
Mike Griffin, Whole Earth Environmental, Inc.



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 18, 1999

CERTIFIED MAIL

RETURN RECEIPT NO: Z-274-520-625

→ receipt filed
with TNM-96-15

Mr. Tony Savoie
Texas-New Mexico Pipe Line Company
P.O. Box 1030
Jal, New Mexico 88252

RE: TNM-96-16 SPILL SITE

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) January 14, 1999 "BASELINE RISK ASSESSMENT REPORT, TNM-96-16, LEA COUNTY, NEW MEXICO, JOB NO. 610088-1" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains TNMPLC's assessment of the risk for a crude oil pipeline spill at the TNM-96-16 site located in Unit L, Section 4, Township 17 South, Range 32 East, Lea County New Mexico. The document also recommends remedial actions based upon investigative results of the extent of contamination and the risk assessment.

The above recommended remedial actions are approved with the following conditions:

1. TNMPLC will document the final soil remediation levels achieved by obtaining final soil samples across the base of the excavated areas according to OCD's "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES".
2. TNMPLC will provide the OCD with a final report containing the results of the remedial actions. The report will be submitted to the OCD Santa Fe Office by May 1, 1999 with a copy provided to the OCD Hobbs District Office.
3. TNMPLC will notify the OCD at least 24 hours in advance of the scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Mr. Tony Savoie
February 18, 1999
Page 2

Please be advised that OCD approval does not relieve TNMPLC of liability if the work plan fails to adequately remediate contamination related to their activities or if remaining contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve TNMPLC 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 Office
James D. Mosley, KEI



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3763 FAX

January 14, 1999

Mr. Tony Savoie
TEXAS - NEW MEXICO PIPE LINE COMPANY
P.O. Box 1030
Jal, New Mexico 88252

RECEIVED

JAN 22 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Baseline Risk Assessment Report
TNM-96-16
Lea County, New Mexico
Job No. 610088-1

Dear Mr. Savoie:

Transmitted with this letter is the Baseline Risk Assessment Report for TNM-96-16, located in Lea County, New Mexico. KEI recommends the site be excavated to approximately 15 feet below ground surface and backfill with clean soil.

Please call me at (210) 680-3767 if you have questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'James D. Mosley', is written over a circular stamp. The signature is fluid and cursive.

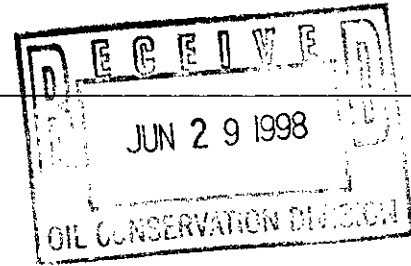
James D. Mosley, P.E.
Senior Engineer

Enclosure

cc: Marc Oler, Equilon
Mr. William C. Olson, OCD Santa Fe ✓
Mr. Chris Williams, OCD Hobbs



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3763 FAX



June 26, 1998

Mr. Tony Savoie
TEXAS - NEW MEXICO PIPE LINE COMPANY
P.O. Box 1030
Jal, New Mexico 88252

Re: Subsurface Investigation Report
TNM-96-16
Lea County, New Mexico
Job No. 610088-1

Dear Mr. Savoie:

Transmitted with this letter is the final copy of the Subsurface Investigation Report for TNM-96-16, located in Lea County, New Mexico. One copy has been forwarded to OCD Hobbs and one to OCD Sante Fe.

Please call me at (210) 680-3767 if you have questions or comments.

Respectfully,

Theresa Nix
for

Theresa Nix
Project Manager

Enclosure

cc: Marc Oler, TTTI
Wayne Price, OCD Hobbs
William Olsen, OCD Sante Fe ✓