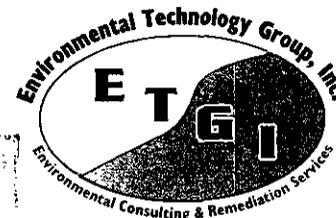
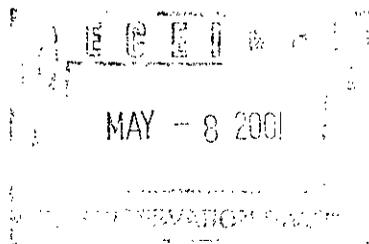


CORRESPONDENCE

MISC.

May 3, 2001

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
1220 South Francis
Santa Fe, NM 87505



RE: EOTT TNM 98S-01 Leak Site, NW ¼, NW ¼, Sec. 20, T19S, R37E, Lea County
NM

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the enclosed Remediation Work Plan Supplement (RWPS). The RWPS is in response to your letter, dated October 30, 2000, addressing our request for closure at the above referenced site. The RWPS contains the following:

- Figure 1- Site Location Map of the immediate area
- Figure 2- A groundwater Gradient Map showing the existing monitoring wells and the proposed location of the temporary monitoring well
- Table One- A summary of the analytical testing from December 1999 through August 2000
- Table Two- A summary of groundwater elevations for the sampling events
- Appendix A- Laboratory analytical results and associated quality assurance/quality control data indicating that no constituent of concern has been above the limits set by the New Mexico Water Quality Control Commission during the sampling period

Upon implementation of the enclosed RWPS, an additional request for closure of this site will be submitted.

If further questions or concerns arise, please call me at (505) 397-4882.

Sincerely,

Ken Dutton
Sr. Project Manager

Enclosure

cc: Chris Williams - NMOCD District I
Wayne Brunette -EOTT- Midland, TX
Mike Kelly - EOTT - Houston
ETGI - Midland, TX
ETGI - Hobbs, NM

**RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION
FOR ADDITIONAL INFORMATION**

**EOTT ENERGY CORP.
TNM 98S-01
LEA COUNTY, NEW MEXICO**

RECEIVED

FEB 28 2001

Prepared For:
EOTT Energy Corp.
5805 East Highway 80
Midland, Texas 79701

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Environmental Technology Group, Inc. Project No. EOT2067C

Prepared By:
Environmental Technology Group, Inc. (ETGI)
2540 West Marland Blvd.
Hobbs, New Mexico 88240

January 26, 2001

**RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION
FOR ADDITIONAL INFORMATION**

**TNM 98-S01
Lea County, New Mexico
January 26, 2001
Prepared By:
ETGI**

INTRODUCTION

Environmental Technology Group, Inc. (ETGI) hereby submits this additional information to the New Mexico Oil Conservation Division (NMOCD) on behalf of EOTT Energy Corp. (EOTT) on the TNM 98S-01 leak site. This information was requested by Mr. Bill Olson of the NMOCD, in a letter dated October 30, 2000, to assist in obtaining closure for the site.

BACKGROUND

The leak site is located northwest of the town of Monument, in NW $\frac{1}{4}$, NW $\frac{1}{4}$ of Section 20, Township 19 South, Range 37 East, in Lea County, New Mexico, as depicted in Figure 1, Site Location Map. Prior activities at the site included installation of three monitoring wells and quarterly sampling and analysis of the groundwater for constituents of concern (COC). As per NMOCD requirements, on completion of four consecutive groundwater-sampling events with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards, a letter was submitted for closure.

The NMOCD response, dated October 30, 2000, required the installation of a temporary monitoring well adjacent to and down gradient of the release point to perform a one time sampling event of the groundwater as well as the additional information supplied in the report.

ADDITIONAL INFORMATION

Attached are the Groundwater Gradient Maps for each of the four sampling events in the Figures section, as requested in the response letter. The summation of the groundwater elevations for the sampling events is found in Table 2, Groundwater Elevation Table.

Table 1 depicts the analytical results for the groundwater analysis on the four groundwater sampling events. The corresponding laboratory analytical and associated quality assurance/quality control data are found as an Appendix.

**RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION
FOR ADDITIONAL INFORMATION**

**EOTT ENERGY CORP.
TNM 98S-01
LEA COUNTY, NEW MEXICO**

Prepared For:
EOTT Energy Corp.
5805 East Highway 80
Midland, Texas 79701

Environmental Technology Group, Inc. Project No. EOT2067C

Prepared By:
Environmental Technology Group, Inc. (ETGI)
2540 West Marland Blvd.
Hobbs, New Mexico 88240

January 26, 2001

**RESPONSE TO NEW MEXICO OIL CONSERVATION DIVISION
FOR ADDITIONAL INFORMATION**

**TNM 98-S01
Lea County, New Mexico
January 26, 2001
Prepared By:
ETGI**

INTRODUCTION

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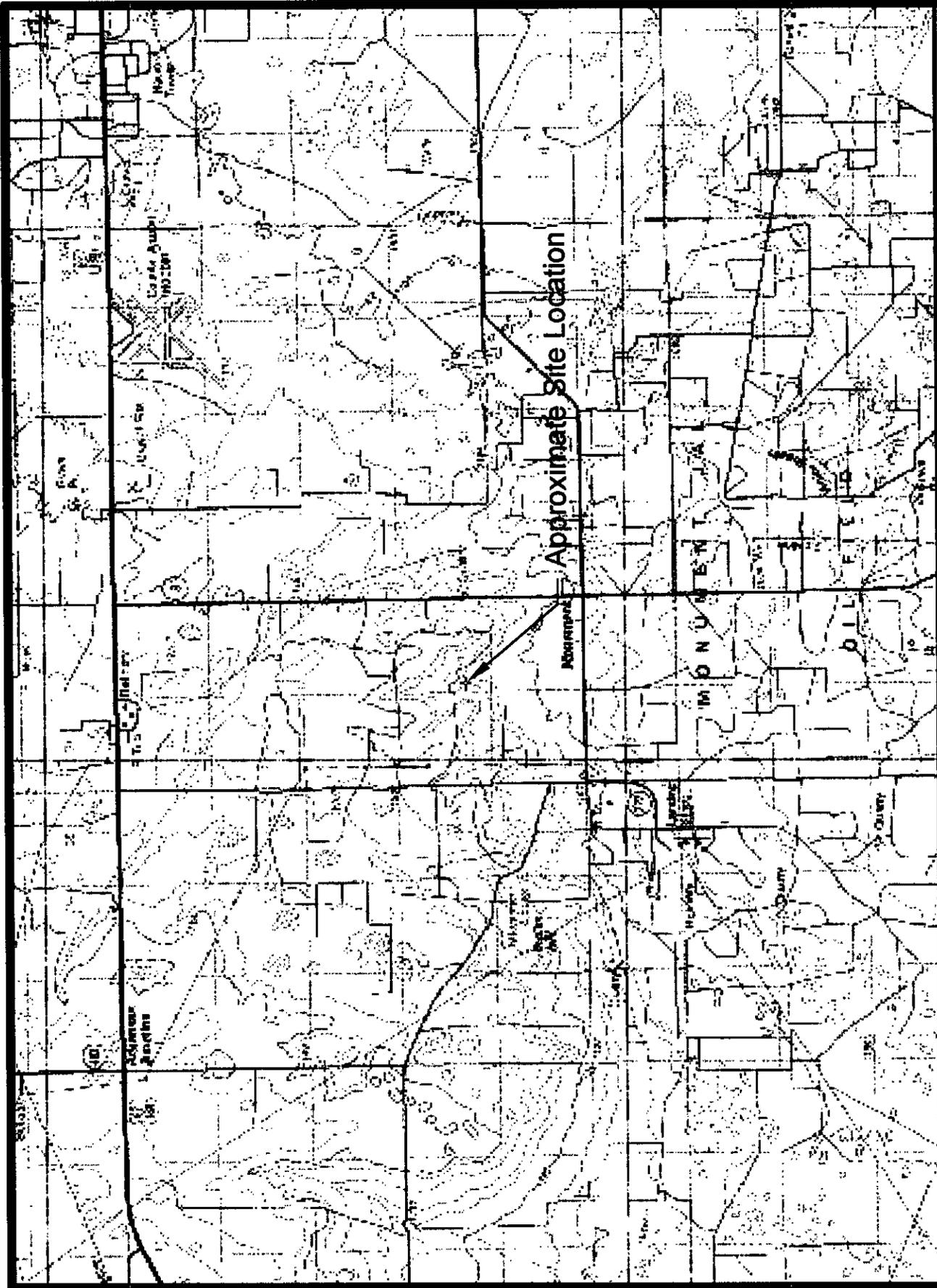
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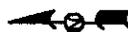
FIGURES



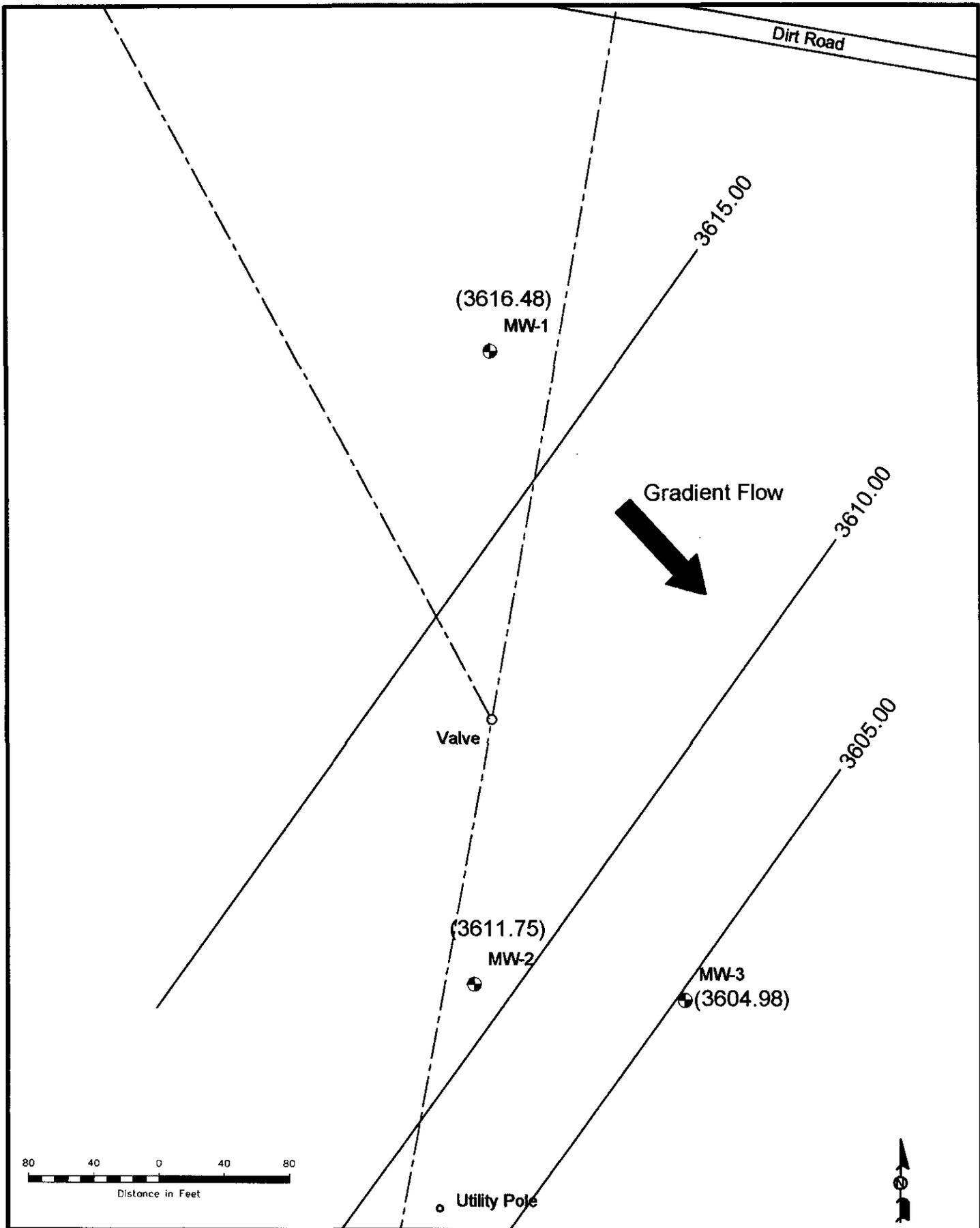
Environmental Technology Group, Inc.

Site Location Map

EOTT Energy Corp.
TNM 98S-01
Lea County, NM



Scale: NTS
Prep By: DJ
Checked By: BA
January 24, 2001
ETGI Project # E07267C



LEGEND:

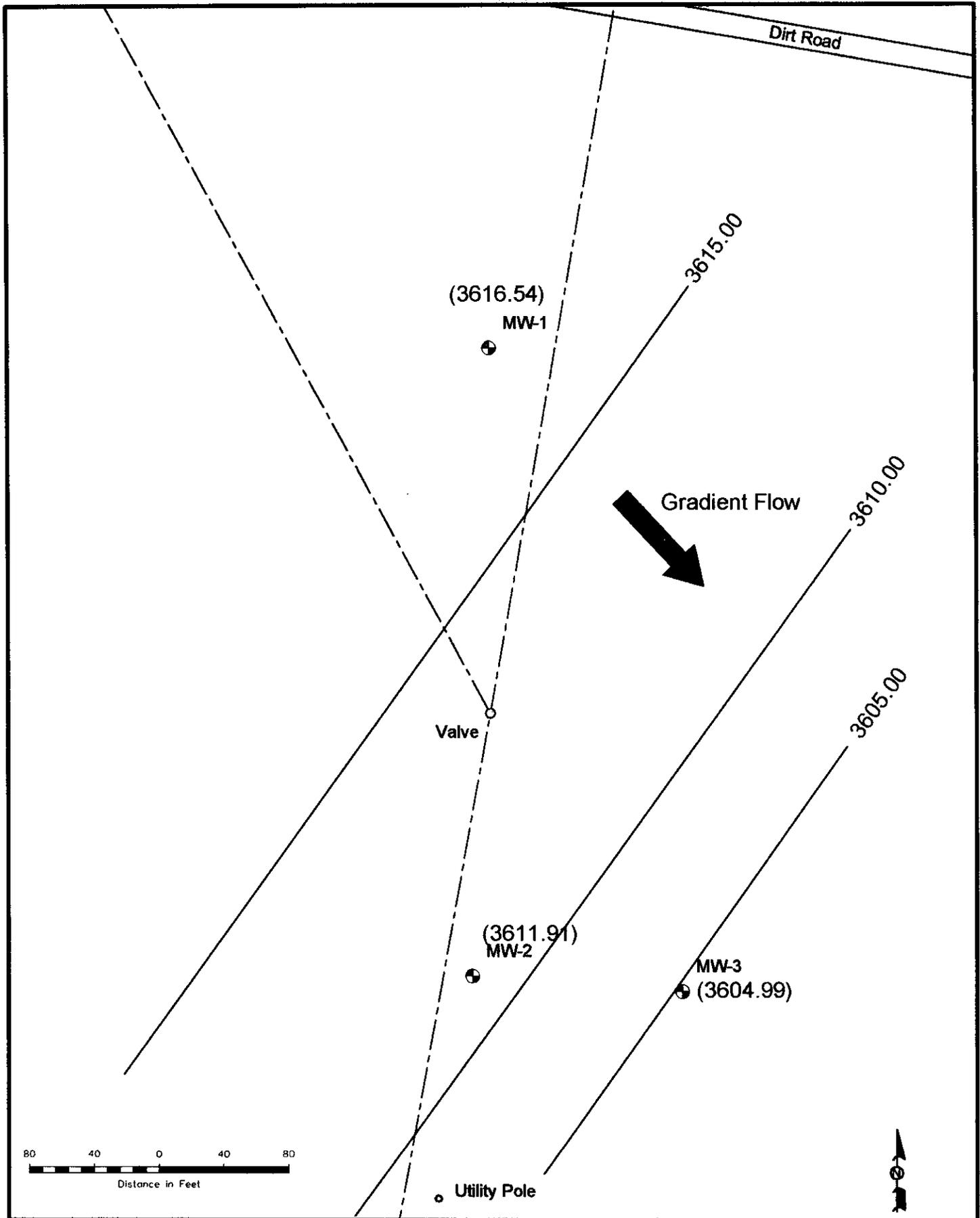
- Monitor Well Location
- Groundwater Gradient Line
- (3543.52) Groundwater Elevation In Feet

Inferred Groundwater
Gradient 12/14/99
EOTT Energy Corp.
TNM 98S-01
Lea County, NM



**Environmental Technology
Group, Inc.**

Scale: 1" = 80'	Prep By: JDJ	Checked By: BA
January 24, 2001	ETGI Project # EOT2067C	



LEGEND:

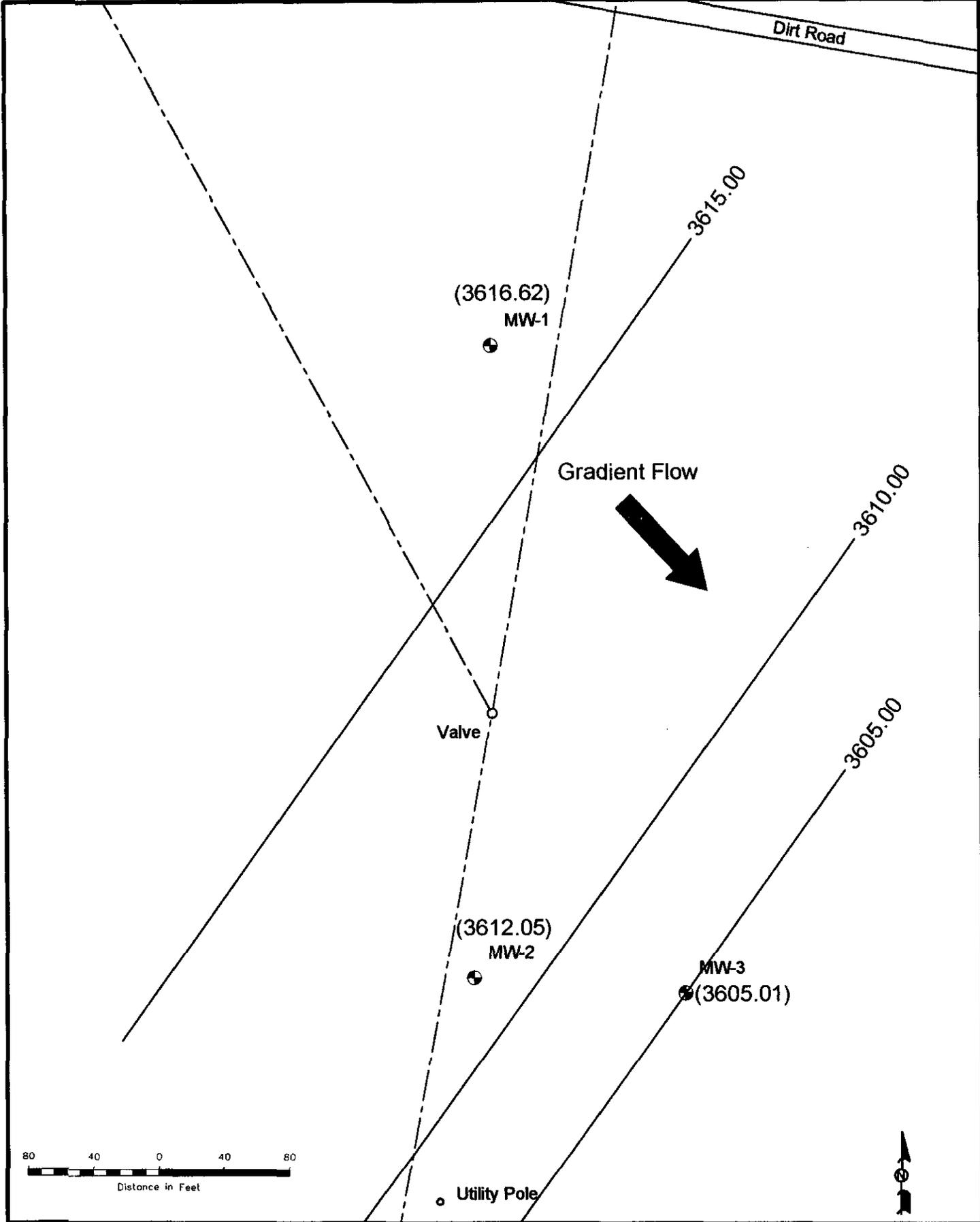
-  Monitor Well Location
-  Groundwater Gradient Line
-  Groundwater Elevation In Feet

Inferred Groundwater
Gradient 3/28/00
EOTT Energy Corp.
TNM 98S-01
Lea County, NM



**Environmental Technology
Group, Inc.**

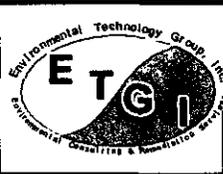
Scale: 1" = 80'	Prep By: JDJ	Checked By: BA
January 24, 2001	ETGI Project # EOT2067C	



LEGEND:

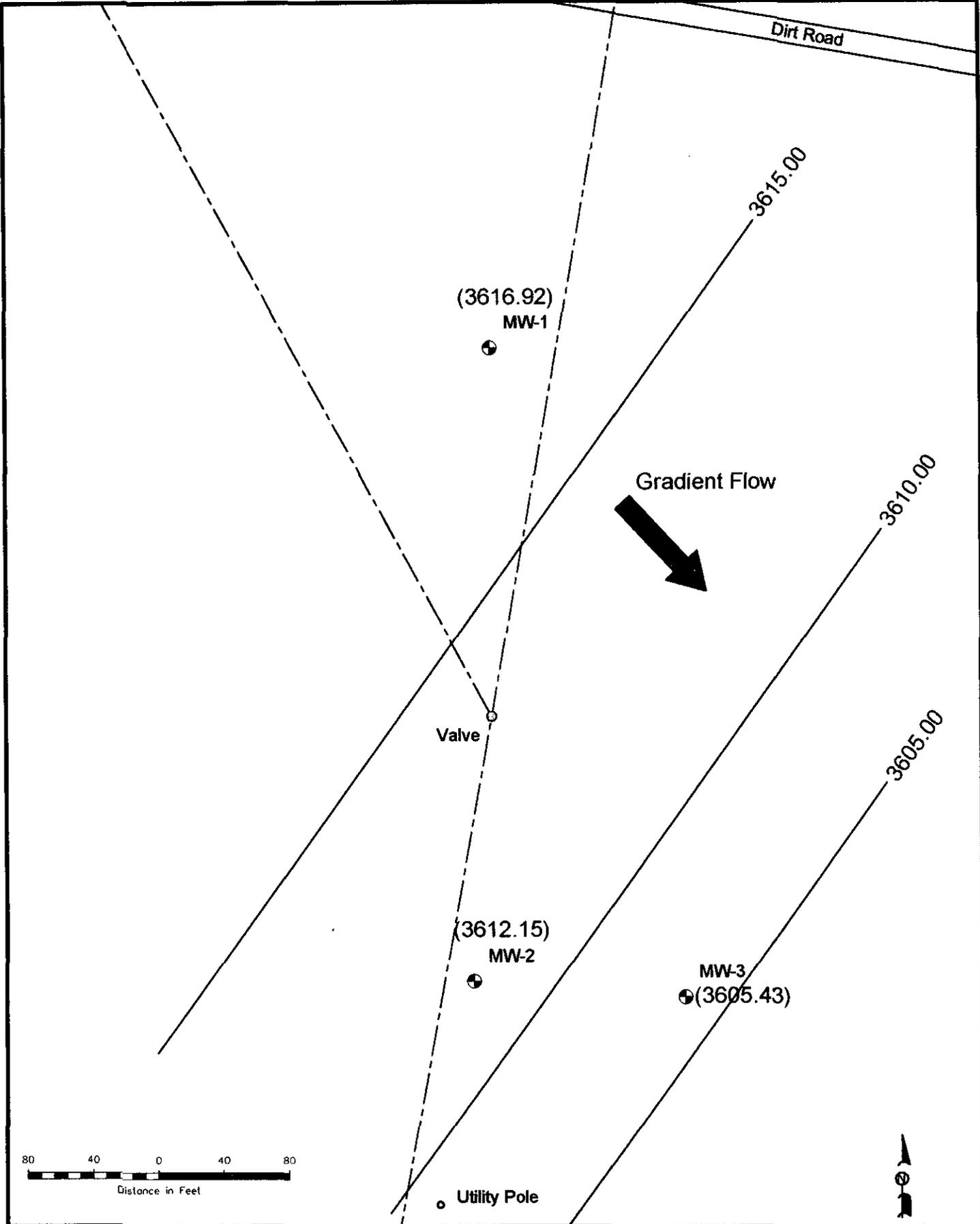
- ⊕ Monitor Well Location
- Groundwater Gradient Line
- (3543.52) Groundwater Elevation In Feet

Inferred Groundwater Gradient 6/20/00
 EOTT Energy Corp.
 TNM 98S-01
 Lea County, NM



Environmental Technology Group, Inc.

Scale: 1" = 80'	Prep By: JDJ	Checked By: BA
January 24, 2001	ETGI Project # EOT2067C	



LEGEND:

- ⊕ Monitor Well Location
- Groundwater Gradient Line
- (3543.52) Groundwater Elevation In Feet

Inferred Groundwater
Gradient 8/30/00
EOTT Energy Corp.
TNM 98S-01
Lea County, NM



**Environmental Technology
Group, Inc.**

Scale: 1" = 80'	Prep By: JDJ	Checked By: BA
January 24, 2001		ETGI Project # EOT2067C

TABLES

**TNM 98-S01
GROUNDWATER ELEVATION TABLE
PROJECT # EOT2067C
12/14/99 - 8/30/00**

Well Number	Date	Casing Well Elevation	Depth to Product	Depth to Water	PSH Thickness	Corrected Groundwater Elevation
MW - 1	12/14/99	3,634.38	-	17.90	0.00	3,616.48
MW - 1	3/28/00	3,634.38	-	17.84	0.00	3,616.54
MW - 1	6/20/00	3,634.38	-	17.76	0.00	3,616.62
MW - 1	8/30/00	3,634.38	-	17.46	0.00	3,616.92
MW - 2	12/14/99	3,633.96	-	22.21	0.00	3,611.75
MW - 2	3/28/00	3,633.96	-	22.05	0.00	3,611.91
MW - 2	6/20/00	3,633.96	-	21.91	0.00	3,612.05
MW - 2	8/30/00	3,633.96	-	21.81	0.00	3,612.15
MW - 3	12/14/99	3,631.79	-	26.81	0.00	3,604.98
MW - 3	3/28/00	3,631.79	-	26.80	0.00	3,604.99
MW - 3	6/20/00	3,631.79	-	26.78	0.00	3,605.01
MW - 3	8/30/00	3,631.79	-	26.36	0.00	3,605.43

APPENDICES

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/Iced/HCl
Project #: EOT1015C
Project Name: TNM 98-501
Project Location: Monument, N.M.

Sampling Date: 12/14/99
Receiving Date: 12/17/99
Analysis Date: 12/18/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
22416	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
22417	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
22418	MW-3	0.002	0.002	0.002	0.003	0.003

% IA	104	100	101	102	101
% EA	91	89	89	90	89
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B.5030

Raland K Tuttle
Raland K. Tuttle

12-21-99
Date

Environmental Lab of Texas, Inc. 12600 West I-20 East Odessa, Texas 79763
 (915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST
 CEC 0553

Project Manager: Jesse Taylor
 Phone #: (915) 664-9166
 FAX #: (505) 505-3760

Company Name & Address: ETEI
 P.O. BOX 4845 MIDLAND TX 79704

Project #: EOT 1015 C
 Project Name: TMM 98-501

Project Location: Prodamment, NM
 Sampler Signature: *[Signature]*

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX						PRESERVATIVE METHOD				SAMPLING		TPH 418.1	TCLP Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	TDS	RCI
				WATER	SOIL	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER	DATE	TIME						
22416	MW 1	2	✓	X						X											
22417	MW 2	1	✓	↓						↓											
22418	MW 3	1	✓	↓						↓											

Relinquished by:	Date:	Times:	Received by:	REMARKS
<i>[Signature]</i>	12-5-99		<i>[Signature]</i>	SMN Request. H. Damm
<i>[Signature]</i>	12-17-99	1340	S. McManey	
<i>[Signature]</i>			Received by Laboratory:	Invoice: LAMMAN FORD 10/5/01

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760

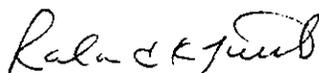
SampleType: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1015C
Project Name: TNM 98-501
Project Location: Monument , N.M.

Sampling Date: 03/28/00
Receiving Date: 03/28/00
Analysis Date: 3/28 & 3/29/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
24390	MW 1	0.001	<0.001	<0.001	<0.001	<0.001
24391	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
24392	MW 3	<0.001	<0.001	0.001	0.001	<0.001

% IA	97	87	91	100	87
% EA	97	87	87	94	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Ralund K. Tuttle

3-30-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
2540 MARLAND
HOBBS, N.M. 88240
FAX: 505-397-4701
FAX: 915-520-4310

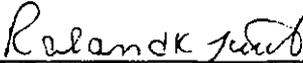
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 30 deg. F
Project #: EOT 2015C
Project Name: TNM 98-S01
Project Location: Lea County, N.M.

Sampling Date: 06/20/00
Receiving Date: 06/23/00
Analysis Date: 06/27/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
27352	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
27353	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
27354	MW 3	<0.001	0.001	<0.001	<0.001	<0.001

% IA	96	91	92	100	93
% EA	98	96	96	107	97
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Raland K. Tuttle

6-29-00
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

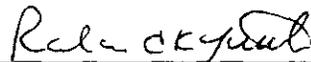
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 30 deg. F
Project #: EOT 2067C
Project Name: TNM 98-S01
Project Location: Monument, N.M.

Sampling Date: 08/30/00
Receiving Date: 09/01/00
Analysis Date: 09/05/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTEX mg/L
30307	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30308	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30309	MW 3	0.003	<0.001	<0.001	<0.001	<0.001	0.003
30310	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	103	100	103	106	99
% EA	104	104	106	110	102
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B.5030


Raiaud K. Tuttle

9-6-00
Date



For Use On
EOTT ENERGY CORP. - Projects Only
 4600 West Wall
 Midland, TX 79703
 Tel (915) 522-1139
 Fax (915) 520-4310

2540 West Marland
 Hobbs, NM 88242
 Tel (505) 397-4862
 Fax (505) 397-4701

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

ANALYSIS REQUEST
 (Circle or Specify Method No.)
COC 215

BTEX 8021B/	
TPH 418-1/TX 1005	
TPH 8015M GRO/DRO	
PAH 8270C (8100 New Mexico only)	
Total Metals Ag As Ba Cd Cr Pb Se Hg 6010B/7470	
TCLP Metals Ag As Ba Cd Cr Pb Se Hg	
TCLP Volatiles	
TCLP Sem Volatiles	
Volatiles 8260B	
Sem Volatiles 8270C	
TDS 160.1	
Calcions/Anions 375.4/325.3	

LAB # (Lab Use Only)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX				PRESERVATION METHOD				SAMPLING			
				WATER	SOIL	AIR	SLUDGE	HCL	HNO ₃	NAHSO ₄	ICE	NONE	DATE	TIME	
30307	MW 1	2	V X					X					8:30	12:42	X
30308	MW 2		V											12:21	
30309	MW 3		V											13:00	
30310	EB 1		V											13:15	

Project Manager: *BETA ALDRICH*

Project Name: *TNM 98 SOI*

Project Location: *MONUMENT AUM*

Project Number: *EOT 2067C*

Sampler Signature: *[Signature]*

Received by: _____ Date: _____ Time: _____

Relinquished by: *[Signature]* Date: *5-1-00* Time: *14:00*

Relinquished by: *[Signature]* Date: *9-1-00* Time: *1:00*

REMARKS:
 30 °F
 FAX RESULTS: HOBBS OFFICE
 MAIL RESULTS: EOTT
 INVOICE: EOTT

Received at Lab by: *[Signature]* Date: *9-1-00* Time: *17:00*



February 20, 2001

RECEIVED

FEB 28 2001

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
2040 South Pacheco
Santa Fe, NM 87505

RE: EOTT TNM 98S-01 Leak Site, NW ¼, NW ¼, Sec 20, T19S, R37E, Lea County, NM

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following information in response to your letter, dated October 30, 2000, pertaining to our request for closure at the above referenced site. Our responses to your additional items requested are as follows:

- 1.) A Work Plan for the installation of an additional monitoring well was supplied under separate cover. The temporary monitoring well will be installed adjacent to and down gradient of, the release point.
- 2.) Please find attached in the Figures Section, a groundwater Gradient Map for the four sampling events identified in the previous correspondence. Also attached are Table 1, a summary of the analytical testing from December 1999 through August 2000 and Table 2, a summary of groundwater elevations for the sampling events. The corresponding laboratory analytical and associated quality assurance/quality control data are found as an Appendix. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period.

An additional request for closure of this site, plugging and abandoning the monitoring wells, returning the surface to its original contour and reseeding the affected areas at the site will be submitted on completion of the Work Plan. A closure report will follow on completion of these activities.

If you have any questions or comments, please contact me at (505) 397-4882. Thank you.

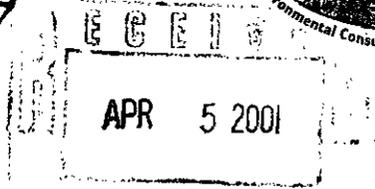
Sincerely,

Beth Aldrich
Sr. Project Manager/ Geologist

January 29, 2001

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
2040 South Pacheco
Santa Fe, NM 87505

COPY



RE: EOTT TNM 98S-01 Leak Site, NW ¼, NW ¼, Sec 20, T19S, R37E, Lea County, NM

Mr. Olson:

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If you have any questions or comments, please contact me at (505) 397-4882. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Beth Aldrich".

Beth Aldrich
Sr. Project Manager/ Geologist



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

February 8, 2001

CERTIFIED MAIL
RETURN RECEIPT NO: 5051-4119

Mr. Glenn Waldrop
EOTT Energy Corporation
P.O. Box 1660
Midland, Texas 79702

RE: CASE # 1R0097
TNM-98S-01 LEAK SITE
LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Corporation's (EOTT) January 19, 2001 "REMEDIATION WORK PLAN, EOTT ENERGY CORP, TNM 98S-01, LEA COUNTY, NEW MEXICO" which was submitted on February 5, 2001 on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains EOTT's work plan for installation of an additional ground water monitoring well at EOTT's TNM 98S-01 leak site located in the NW/4 NW/4 of Section 20, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico.

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

1. EOTT shall complete the new monitor 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 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.
2. All soil and ground water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC).
3. All wastes generated during the investigation shall be disposed of at an OCD approved facility.

Please be advised that OCD approval does not relieve EOTT of responsibility should the investigation actions fail to adequately define the extent of contamination related to EOTT's pipeline, 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, please contact me at (505) 476-3491.

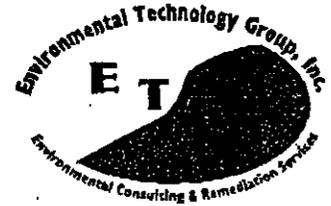
Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Beth Aldrich, Environmental Technology Group, Inc.

97



FAX COVER SHEET

DATE 2/5/01

TO Bill Olson

FROM Beth Aldrich

MMOJD

ENVIRONMENTAL TECHNOLOGY GROUP

FAX NUMBER 505 416-3462

FAX NUMBER 915/520-4310

505 391-4701

NUMBER OF PAGES (INCLUDING COVER) ~~37~~ 19

NOTES: 2 Work Plans for add'l borings

EO 11 TMM 98501

Thanks!

BEO

REMEDATION WORK PLAN

**EOTT ENERGY CORP.
TNM 98S-01
LEA COUNTY, NEW MEXICO**

**Prepared For:
EOTT Energy Corp.
5805 East Highway 80
Midland, Texas 79701**

Environmental Technology Group, Inc. Project No. EOT2067C

**Prepared By:
Environmental Technology Group, Inc. (ETGI)
2540 West Marland Blvd.
Hobbs, New Mexico 88240**

January 19, 2001

**WORK PLAN SUPPLEMENT
FOR SITE CLOSURE
TNM 98-S01
Lea County, New Mexico
January 19, 2001
Prepared By:
ETGI**

INTRODUCTION

Environmental Technology Group, Inc. (ETGI) hereby submits a Work Plan to the New Mexico Oil Conservation Division on behalf of EOTT Energy Corp. (EOTT) for the installation of an additional temporary groundwater monitoring well at the TNM 98S-01 leak site. This plan will serve as a "Work Plan Supplement" as referenced in the "General Work Plan for Remediation of EOTT Pipeline Spills, Leaks, and Releases in New Mexico" approved by New Mexico Oil Conservation Division (NMOCD) on August 1, 2000. The regulatory basis for both the General Work Plan and this Work Plan Supplement is the August 1993 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.

BACKGROUND

The leak site is located northwest of the town of Monument, in NW $\frac{1}{4}$, NW $\frac{1}{4}$ of Section 20, Township 19 South, Range 37 East, in Lea County, New Mexico, as depicted in Figure 1, Site Location Map. Prior activities at the site included installation of three monitoring wells and quarterly sampling and analysis of the groundwater for constituents of concern (COC). As per NMOCD requirements, on completion of four consecutive groundwater-sampling events with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards, a letter was submitted for closure.

The NMOCD response, dated October 30, 2000, required the installation of a temporary monitoring well adjacent to and down gradient of the release point to perform a one time sampling event of the groundwater. If the sample obtained is below the standards set forth in NMOCD Rule 19.B, then the NMOCD will issue closure approval for the site.

PURPOSE OF INVESTIGATION

As required by the NMOCD, in a letter dated October 30, 2000, further investigation of the groundwater at the site is necessary. An additional temporary monitoring well is to be installed following NMOCD guidelines adjacent to and down gradient of the release point at the site. Once installation of the monitoring well is complete, a one-time sampling event will be performed on the groundwater.

METHODOLOGY

ETGI plans to supervise and coordinate the drilling of the temporary groundwater monitoring well at the site. The monitoring well will be installed adjacent to, and down gradient of, the release point. The proposed location is depicted on Figure 2, Site Map. During the monitoring well installation soil samples will be collected every five feet with a split spoon sampler except in those locations containing indurated materials. Each five-foot sample will be field screened with a photo ionization detector (PID) and a continuous

lithologic log of the penetrated section will be maintained and recorded. All of the soil samples, including a surface sample, will be transported under Chain of Custody to Environmental Laboratory of Texas (ELOT) for analysis.

The monitoring well will be completed and developed in accordance with NMOCD Guideline Parts V.C.1 and V.C.3, respectively. The fluid levels will be measured within 1/100th of a foot then purged and sampled in accordance with the NMOCD Guideline Part V.C.4. As required by NMOCD Rule 19.B, the groundwater sample will be submitted for analyses identified below.

ANALYSES

All soil samples submitted for analysis will be analyzed for TPH using EPA Method 8015 Modified GRO/DRO Extended Range. Samples with a field PID reading in excess of 100ppm may be submitted for Benzene, Toluene, Ethyl benzene and Xylenes (BTEX) analysis using EPA Method 8021B.

The groundwater sample will be submitted for the following analysis:

- BTEX (EPA Method 8021B and 5030)
- TPH – EPA Method 8015 Modified GRO/DRO Extended Range
- Major Cations and Anions – EPA Methods 375.4, 3251.3 and 310
- Total Dissolved Solids (TDS) – EPA Method 160.1
- Polynuclear Aromatic Hydrocarbons (PAH) – EPA Method 8270C, 3510
- Metals – EPA Method 6010B, 7470

DISCUSSION OF FINDINGS

Four consecutive sampling events of the groundwater from the three monitoring wells that were conducted prior to this Work Plan indicated no analytical results above the NMWQCC standards. These results are shown in Table 1.

CONCLUSIONS

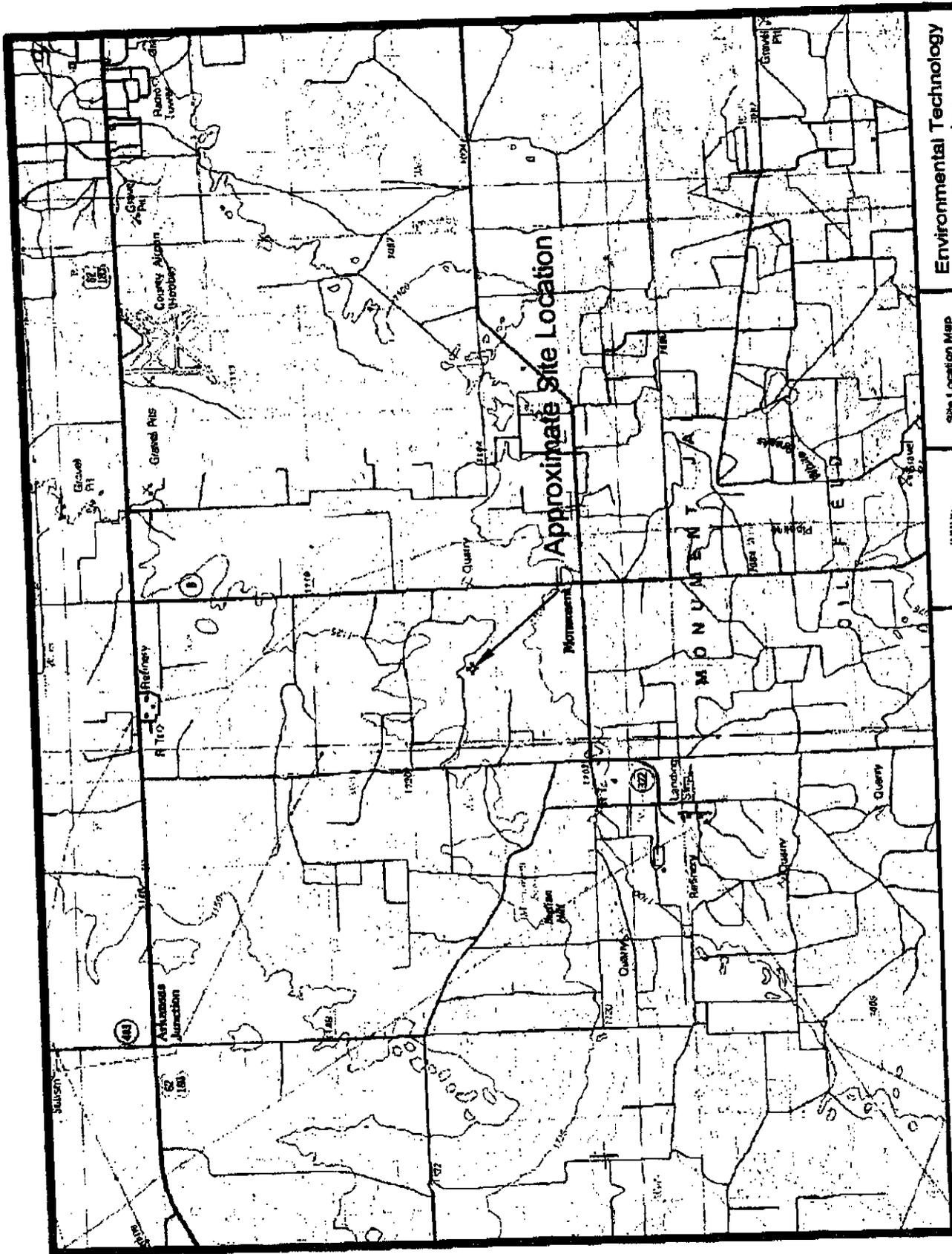
Groundwater contamination appears not to have migrated down gradient of the release point based on prior analytical testing at the previously installed monitoring wells. Further investigation and sampling of the groundwater adjacent to, and down gradient of, the release point is needed to delineate any hydrocarbon impact and to secure site closure as per NMOCD requirements.

FOLLOW-UP ACTIVITIES

Installation of a temporary monitoring well, adjacent to, and down gradient of the release point, can be initiated within two weeks of the work plan approval. Once installed, purging and sampling of the groundwater will be conducted. The groundwater sample will be transported under Chain of Custody to ELOT for analysis.

On notification of the results of the analysis, the site will be resubmitted for closure if the analysis indicates no COC above the NMQWCC standards. If the analysis indicates COC above the NMWQCC standards, further investigation will be addressed under separate cover.

FIGURES

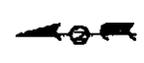


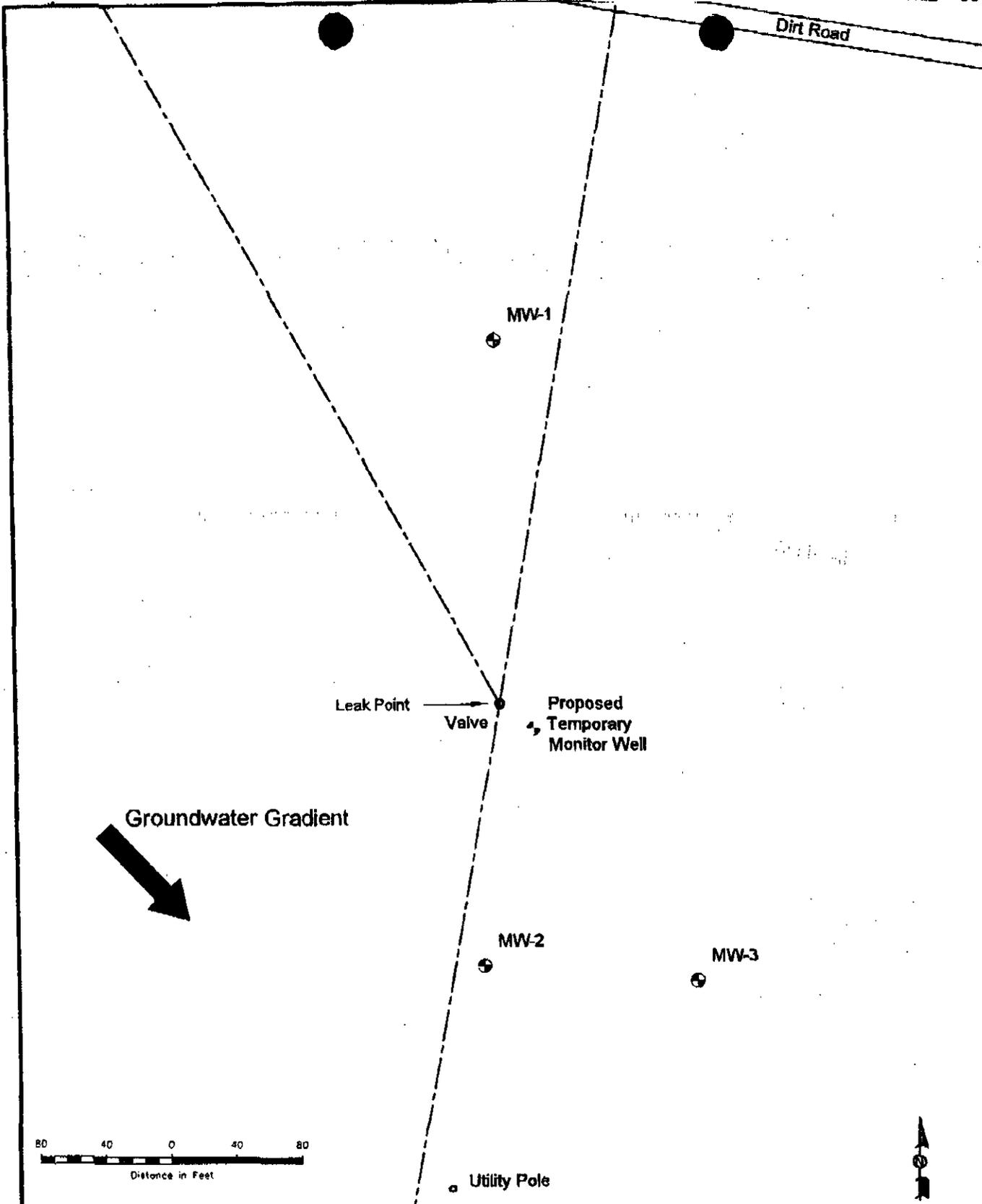
Environmental Technology Group, Inc.

Scale: NTS
 Prepped By: DJ
 Checked By: BA
 January 24, 2001
 ESTD Project # 8072877C

Site Location Map

EOG Energy Corp.
 TNM 888-01
 Lea County, NM





LEGEND:

⊕ Monitor Well Location

Figure 2
 Site Map
 Proposed Temp. MW
 EOTT Energy Corp.
 TNM 985-01
 Lea County, NM



Environmental Technology Group, Inc.

Scale: 1" = 80'	Prep By: JDI	Checked By: BA
January 24, 2001	ETGI Project # EOT2067C	

TABLES

Table 1

CONCENTRATIONS OF BTEX IN GROUNDWATER

EOTT ENERGY PIPELINE LIMITED PARTNERSHIP

TNM 98-SO1

MONUMENT (LEA COUNTY), NEW MEXICO

ETGI Project # EOT 2067C

All concentrations are in mg/L

SAMPLE DATE	SAMPLE LOCATION	SW 845-8021B, 6030				
		BENZENE	TOLUENE	ETHYL-BENZENE	M,P-XYLENES	O-XYLENES
12/14/99	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
3/28/00	MW-1	0.001	<0.001	<0.001	<0.001	<0.001
6/20/00	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
8/30/00	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
12/14/99	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
3/28/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
6/20/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
8/30/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
12/14/99	MW-3	0.002	0.002	0.002	0.003	0.003
3/28/00	MW-3	<0.001	<0.001	0.001	0.001	<0.001
6/20/00	MW-3	<0.001	0.001	<0.001	<0.001	<0.001
8/30/00	MW-3	0.003	<0.001	<0.001	<0.001	<0.001

APPENDICES

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

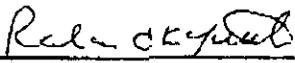
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ 30 deg. F
Project #: EOT 2067C
Project Name: TNM 98-501
Project Location: Monument, N.M.

Sampling Date: 08/30/00
Receiving Date: 09/01/00
Analysis Date: 09/05/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L	TOTAL BTEX mg/L
30307	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30308	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
30309	MW 3	0.003	<0.001	<0.001	<0.001	<0.001	0.003
30310	EB 1	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	103	100	103	106	99
% EA	104	104	108	110	102
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Randal K. Tuttle

9-6-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
2540 MARLAND
HOBBS, N.M. 88240
FAX: 505-397-4701
FAX: 915-520-4310

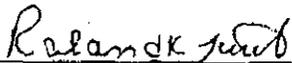
Sample Type: Water
Sample Condition: Intact/ Iced/ HCI/ 30 deg. F
Project #: EOT 2015C
Project Name: TNM 98-S01
Project Location: Lea County, N.M.

Sampling Date: 06/20/00
Receiving Date: 06/23/00
Analysis Date: 06/27/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
27352	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
27353	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
27354	MW 3	<0.001	0.001	<0.001	<0.001	<0.001

% IA	96	91	92	100	93
% EA	98	95	96	107	97
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030


Roland K. Tuttle

6-29-00
Date

Environmental Lab of Texas, Inc. 12600 West I-20 East Odessa, Texas 79763
 (915) 563-1800 FAX (915) 563-1733

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

CO# 169

Project Manager: **G TAYLOR** Phone #: (505) 397-4882
 Company Name & Address: **ETGE, 2540 W. Marland, Hobbs, NM 88240** FAX #: (505) 397-4701
 Project #: **EOT 2015C** Project Name: **LEA CTY NM**

Project Location: **LEA CTY NM**
 Sample Signature: *[Signature]*
 Project Name: **TNA 98-801**

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	MATRIX						PRESERVATIVE METHOD			SAMPLING		TIME	REMARKS
				WATER	AIR	SLUDGE	OTHER	HCL	HNO3	ICE	NONE	OTHER	DATE	7000		
27352	MW-1	2	Y					X	X					4/20/05	X	
27353	MW-2	2	V					X	X					10/25	X	
27354	MW-3	2	V					X	X					1/19	X	

Received by: *[Signature]* Date: **23 Jun 00** Time: **1430**
 Received by: *[Signature]* Date: _____ Time: _____
 Received by: _____ Date: _____ Time: _____

FR: (505) 397-4701
 ATTN: KJD
 INVOICE: EOTT

309

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/ Iced/HCl
Project #: EOT 1015C
Project Name: TNM 98-501
Project Location: Monument , N.M.

Sampling Date: 03/28/00
Receiving Date: 03/28/00
Analysis Date: 3/28 & 3/29/00

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
24390	MW 1	0.001	<0.001	<0.001	<0.001	<0.001
24391	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
24392	MW 3	<0.001	<0.001	0.001	0.001	<0.001

% IA	97	87	91	100	87
% EA	97	87	87	94	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8021B,5030

Raland K. Tuttle

Raland K. Tuttle

3-30-00

Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 505-392-3760

Sample Type: Water
Sample Condition: Intact/Icd/HCl
Project #: EOT1015C
Project Name: TNM 98-501
Project Location: Monument, N.M.

Sampling Date: 12/14/99
Receiving Date: 12/17/99
Analysis Date: 12/18/99

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
22416	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
22417	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
22418	MW-3	0.002	0.002	0.002	0.003	0.003

% IA	104	100	101	102	101
% EA	91	89	89	90	89
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8021B.5030

Roland K Tuttle
Roland K. Tuttle

12-21-99
Date



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 30, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: 5051-3730

Mr. Glenn Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: TNM-98S-01 LEAK SITE
LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) September 21, 2000 correspondence titled "EOTT TNM 98S-01 LEAK SITE" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains a summary of ground water analytical sampling results from the site monitor wells and requests closure of the remediation and monitoring actions.

The remediation actions conducted to date appear satisfactory. However, the OCD has the following comments and requests for information regarding the above referenced document:

1. A review of the records on this site shows that there are no results of ground water sampling directly adjacent to the source of contamination. The OCD requires that EOTT submit a plan to install a ground water monitoring well directly adjacent to and downgradient of the excavated area. If a one time sample from this area is below the standards of OCD Rule 19.B., then the OCD will issue closure approval for the site. Please submit the work plan to the OCD Santa Fe Office by November 30, 2000 with a copy provided to the OCD Hobbs District Office.
2. The document does not contain the laboratory analytical results and associated quality assurance/quality control data for the referenced ground water samples, nor a ground water gradient map for each sampling event. Please provide this information.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson". The signature is written in a cursive style with a large initial "W".

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Beth Aldrich, Environmental Technology Group, Inc.

September 21, 2000

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
2040 South Pacheco
Santa Fe, NM 87505

RECEIVED

OCT 6 2000

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION



RE: EOTT TNM 98S-01 Leak Site

Mr. Olson:

On behalf of EOTT Energy Pipeline, Environmental Technology Group, Inc. (ETGI) submits the following request for site closure at the EOTT TNM 98S-01 Leak Site in NW ¼, NW ¼, Section 20, Township 19 South, Range 37 East, in Lea County, New Mexico. As per your requirements, we have completed four consecutive quarters of ground water sampling for the three monitoring wells at the site, with no analytical results above the New Mexico Water Quality Control Commission (NMWQCC) standards for the monitored contaminants of concern (COC).

Please find attached Table 1, a summary of the analytical testing from December 1999 through August 2000, a period of four consecutive quarterly sampling events. As indicated by the results, no COC has been above the NMWQCC limits during the sampling period.

We are requesting approval for closure of this site, plugging and abandoning the monitoring wells, returning the surface to its original contour and reseeding the affected areas at the site. A closure report will follow on completion of these activities.

If you have any questions or comments, please contact me at (505) 397-4882. Thank you.

Sincerely,

Beth Aldrich
Geologist/New Mexico Area Manager

Cc: Glenn Waldrop, EOTT Energy Corp.
Jerry Nickel, ETGI - Midland

Table 1

CONCENTRATIONS OF BTEX IN GROUNDWATER
EOTT ENERGY PIPELINE LIMITED PARTNERSHIP
TNM 98-SO1
MONUMENT(LEA COUNTY), NEW MEXICO
ETGI Project # EOT 2067C

All concentrations are in mg/L

SAMPLE DATE	SAMPLE LOCATION	SW 846-8021B, 5030				
		BENZENE	TOLUENE	ETHYL-BENZENE	M,P-XYLENES	O-XYLENES
12/14/99	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
3/28/00	MW-1	0.001	<0.001	<0.001	<0.001	<0.001
6/20/00	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
8/30/00	MW-1	<0.001	<0.001	<0.001	<0.001	<0.001
12/14/99	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
3/28/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
6/20/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
8/30/00	MW-2	<0.001	<0.001	<0.001	<0.001	<0.001
12/14/99	MW-3	0.002	0.002	0.002	0.003	0.003
3/28/00	MW-3	<0.001	<0.001	0.001	0.001	<0.001
6/20/00	MW-3	<0.001	0.001	<0.001	<0.001	<0.001
8/30/00	MW-3	0.003	<0.001	<0.001	<0.001	<0.001

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 #10
Monument #17	TNM-97-16 (Becky Jo Doom site)
Monument #2	HDO-90-23
Monument #15	SPS-11
TNM-97-17	TNM-98-02
TNM-97-18	TNM-98-S01
TNM-98-05A	TNM-97-23
TNM-96-16	TNM-95-10 (Saunders)
TNM-97-14	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

January 15, 1999

CERTIFIED MAIL

RETURN RECEIPT NO: Z-274-520-591

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

**RE: STAGE 1 ABATEMENT PLAN (AP-5)
TNM-98-S01 SPILL SITE**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed Texas-New Mexico Pipe Line Company's (TNMPLC) August 27, 1998 "GROUND WATER ABATEMENT PLAN TNM-98-S01, SECTION 20, TOWNSHIP 19S, RANGE 37E, LEA COUNTY, NEW MEXICO, JOB NO. 810004-1" and August 28, 1998 "SUBSURFACE INVESTIGATION REPORT, WELLS MW-1, MW-2, MW-3, BORINGS SB-1, SB-2, SB-3, TNM-98-S01, LEA COUNTY, NEW MEXICO, JOB NO. 810004-1" which were submitted on behalf of TNMPLC by their consultant KEI. These documents contain the results of TNMPLC's recent investigation and remediation of ground water contamination at the TNM-98-S01 pipe line spill site located in Unit F, Section 20, T19N, R37E, Lea County, New Mexico. The document also requests closure based upon the current lack of ground water contamination above New Mexico Water Quality Control Commission standards.

Since ground water at the site has been remediated to New Mexico Water Quality Control Commission (WQCC) standards within 1 year, pursuant to OCD Rule 19.D.(1)(g) this site is exempt from the OCD abatement regulations and the OCD therefore retracts the requirement for abatement plan (AP-5). However, since ground water was initially contaminated in excess of WQCC standards, the OCD requires that TNMPLC continue monitoring ground water quality from each monitor well. Ground water from each monitor well will be sampled and analyzed on a quarterly basis for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX) using EPA approved methods. The OCD will consider the site for final closure once TNMPLC has shown that ground water from each monitor well meets WQCC standards for 4 consecutive quarters.

Mr. Tony Savoie
January 15, 1999
Page 2

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 Office
Theresa Nix, KEI

Z 274 520 591

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TOTAL Postage & Fees	\$
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PS Form 3800, April 1995



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

August 27, 1998

Mr. William Olson
STATE OF NEW MEXICO
Oil Conservation Division
2040 South Pacheco
Sante Fe, New Mexico 87505

RECEIVED

AUG 28 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Ground Water Abatement Plan
TNM-98-S01
Section 20, Township 19S, Range 37E
Lea County, New Mexico
Job No. 810004-1

Dear Mr. Olson:

This letter is intended to satisfy the requirements of your letter dated April 29, 1998. In that letter, a Stage 1 abatement plan investigation is requested for site TNM-98-S01 located in Lea County, New Mexico. Although ground water has been impacted, ground water abatement is not required for this site for the following reasons:

- Hydrocarbon impacted soil above OCD closure levels has been removed and replaced with clean soil.
- Water samples taken from monitoring wells MW-1, MW-2, and MW-3, and samples taken from the bottom of the excavation indicate BTEX and PAH concentrations below New Mexico Water Quality Control Commission (NMWQCC) Ground Water Standards.
- Total dissolved solids and chloride concentrations in monitoring wells MW-1, MW-2, and MW-3 were below NMWQCC Ground Water Standards.

Because the source material (hydrocarbon impacted soil) has been removed, ground water concentrations cannot increase above the current levels, which are below applicable NMWQCC Ground Water Standards. Therefore, a closure request report has been prepared and is attached.

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

Respectfully,

Daryl Stacey
Project Manager

Enclosure

cc: Tony Savoie, TNMPL
Marc Oler, TTTI
Wayne Price, OCD Hobbs ✓



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

August 28, 1998

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

RECEIVED

AUG 31 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Subsurface Investigation Report
Wells MW-1, MW-2, MW-3
Borings SB-1, SB-2, SB-3
TNM-98-S01
Lea County, New Mexico
Job No. 810004-1

Dear Mr. Savoie:

Transmitted with this letter is the final copy of the Subsurface Investigation Report for the installation of 3 monitoring wells and 3 soil borings at TNM-98-S01 to characterize the nature and extent of hydrocarbon impact to ground water and soils. One copy has been forwarded to OCD Sante Fe and one to OCD Hobbs.

Please contact me at (210) 680-3767 with your questions or comments.

Respectfully,

Theresa Nix
Project Manager

Enclosure

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



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
 Santa Fe, New Mexico 87505

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1100	Date 8/24/98
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<u>Originating Party</u>	<u>Other Parties</u>
Theresa Nix - KEI	Bill Olson - Environmental Bureau

Subject
 TNM-98-5-01

Discussion
 OCD has not received Stage 1 abatement plan as per
 TNMPLC's 5/14/98 correspondence for extension
 OCD must receive by end of week (120 days) or TNMPLC
 could be subject to NOV

Conclusions or Agreements
 She will get by end of week

Distribution
 file
 Wayne Price - OCD Hobbs

Signed *Bill Olson*



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

May 14, 1998

Mr. Roger Anderson
STATE OF NEW MEXICO
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RECEIVED

MAY 18 1998

Environmental Bureau
Oil Conservation Division

Re: Texas-New Mexico Pipe Line Company
Pipe Line Release TNM-98-S-01
Center of SW/4 Section 20, Township 19 South, Range 37 East
Lea County, New Mexico
Job No. 810004-1

Dear Mr. Anderson:

This letter is in response to your letter addressed to Mr. Tony Savoie dated April 29, 1998. Your letter requests a groundwater abatement plan investigation proposal for the above referenced site by June 26, 1998.

During recent site activities, impacted soils were excavated to closure standards. A closure report will be prepared and submitted to your office when the final soil sampling results have been received. KEI requests a closure report deadline of July 31, 1998.

If you have any questions please contact Mr. Savoie at (505) 395-2705 or call me at (210) 680-3767.

Respectfully,

Theresa Nix

Theresa Nix
Project Manager

cc: TNMPL, Tony Savoie
OCD Hobbs District Office, Wayne Price

Olson, William

From: Price, Wayne
Sent: Tuesday, May 12, 1998 2:57 PM
To: Bill Olson
Cc: Chris Williams
Subject: TNMPL TNM #5 & 5A, Tnm #6, TNM 98-S01

Dear Bill:

Per your request I made a field trip with Tony Savoie and have the following status for each site listed above:

TNM #5 This site has ground water contamination and TNMPL has already proposed to excavate this material out and delineate using excavation.

TNM #5A This site is near #5 and was discovered when working on 5. It was a small flow line leak and TNMPL removed almost all of the source. There is an old Sunco Tank Battery near by, and it appears from my observation when they were excavating that this battery has contamination and should be addressed by the current lease holder which I believe is Amerada Hess. I recommend closure for TNMPL.

TNM #6 This site is not TNMPL and land owner (J. Cooper) agrees. I recommend we allow TNMPL to drop this one.

TNM 98-S01 20-19s-37e Shallow Ground Water contamination. Contaminated soil Was excavated down to groundwater and disposed of off-site. Three MW's were put in one above, two down gradient. While hole was open they sampled water. They have backfilled site.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 29, 1998

CERTIFIED MAIL
RETURN RECEIPT NO: Z-235-437-264

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

**RE: GROUND WATER ABATEMENT
TNM-98-S-01 SITE**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed Texas-New Mexico Pipe Line Company's (TNMPLC) January 30, 1998 "TEXAS-NEW MEXICO PIPE LINE COMPANY, PIPELINE RELEASE TNM-98-S-01, CENTER OF SW/4 SECTION 20, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, JOB NO. 810004 which was submitted on behalf of TNMPLC by their consultant KEI. This document contains TNMPLC's notification of ground water contamination resulting from a crude oil pipeline spill at TNMPLC's TNM-98-S-01 site.

Pursuant to 19 NMAC 15.A.19.C.1, the OCD requires an abatement plan for the TNM-98-S-01 site to abate ground water pollution. To initiate the abatement plan process, the OCD requires that TNMPLC submit to the OCD by June 26, 1998 a Stage 1 abatement plan investigation proposal pursuant to OCD Rule 19.E.1. and OCD Rule 19.E.3.

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

Sincerely,

A handwritten signature in cursive script that reads "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

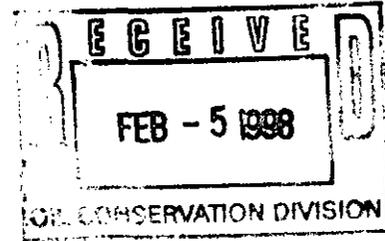
xc: Wayne Price, OCD Aztec Office
Michael Hawthorne, KEI



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
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January 30, 1998

Mr. Roger Anderson
STATE OF NEW MEXICO
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505



Re: Texas-New Mexico Pipe Line Company
Pipe Line Release TNM-98-S-01
Center of SW/4 Section 20, Township 19 South, Range 37 East
Lea County, New Mexico
Job No. 810004

Dear Mr. Anderson:

This letter provides written notification of hydrocarbon impact to ground water at the above referenced site during excavation activities.

During recent release response activities at the referenced site, hydrocarbon impact to ground water was noted. Mr. Tony Savoie of Texas - New Mexico Pipeline Co. (TNMPL) notified Mr. Bill Olsen of OCD Santa Fe of this incident on January 29, 1998, by telephone.

TNMPL plans to install monitoring wells at the site to further characterize the nature and extent of hydrocarbon impact to ground water.

If you have any questions please contact Mr. Savoie at (505) 395-2705 or call me at (210) 680-3767.

Respectfully,

J. Michael Hawthorne, P.G., REM
Senior Geologist

cc: TNMPL, Tony Savoie
OCD Hobbs District Office, Wayne Price



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January 30, 1998

Mr. Roger Anderson
STATE OF NEW MEXICO
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Texas-New Mexico Pipe Line Company
Pipe Line Release TNM-98-S-01
Center of SW/4 Section 20, Township 19 South, Range 37 East
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Senior Geologist

cc: TNMPL, Tony Savoie
OCD Hobbs District Office, Wayne Price



STATE OF
 NEW MEXICO
 OIL
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MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time <u>0830</u>	Date <u>1/30/98</u>
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<u>Originating Party</u>	<u>Other Parties</u>
<u>Tony Scroie - Tex/Mex Pipeline</u>	<u>Bill Olson - Environmental Bureau</u>

Subject
Ground Water Notification - TNM-98-501
- Jal Basin Station

Discussion
~~TNM-98-501~~ - center of SW 1/4, sec 20, T19S, R37E
 - depth to water = 15'
 - product on water
 - result of 1984 spill

Jal Basin Station - SE 1/4 SW 1/4, sec 32, T25S, R37E
 - depth to water = 90'
 - Diesel on water
 - found during site assessment for Texaco sale

Conclusions or Agreements
He will file subsequent report in 10 days

Distribution
 files
 Wayne Price - OCD Hobbs

Signed Bill Olson