



APPROVED

By Mike Buchanan at 11:36 am, Jun 28, 2024

Mr. Mike Buchanan
Environmental Specialist
Environmental Bureau
EMNRD – Oil Conservation Division
8801 Horizon Blvd. NE, Suite 260
Albuquerque, New Mexico 87113

Arcadis U.S., Inc.
10352 Plaza Americana Drive
Baton Rouge
Louisiana 70816
Phone: 225 292 1004
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Date: June 24, 2024
Our Ref: 30167857.500
Subject: Request for Reduced Scope of Monitoring
Former Brickland Refinery Site
Sunland Park, New Mexico
Huntsman International LLC
Case No. AP-01
Incident No. nAUTOAB000054

Request for reduced scope of monitoring work plan at the Former Brickland Refinery is approved. Suspend sampling & analysis for benzene in the following monitoring wells, as they have demonstrated at least eight consecutive quarters well below the human health standards set in the NM WQCC : MW-3S, MW-3D, MW-6S, MW-6D, MW-9S, MW-10, MW-11, MW-17.

Dear Mr. Buchanan:

On behalf of Huntsman International LLC (Huntsman), MW-6D, MW-9S, MW-10, MW-11, MW-17, The Site's monitoring program is conducted in accordance with the Groundwater Monitoring Plan included as Section 3.5 of the Stage 2 Abatement Plan approved by Mr. Bill Olson of the New Mexico Oil Conservation Division (NMOCD) in a letter dated December 17, 1998, and revised in 2006. A request was sent to NMOCD in a letter dated November 7, 2014, to modify the existing sampling performed at the Site. The request was approved by Mr. Glenn von Gonten in correspondence dated April 24, 2015, and the Addendum to Abatement Plan AP-001 for the former Brickland Refinery was submitted to NMOCD on June 3, 2015. The modification to the plan requires quarterly sampling for designated wells.

The monitoring program includes quarterly sampling of ten groundwater monitoring wells at the Site:

- Five off-site well samples (MW-3S, MW-3D, MW-6S, MW-6D, and MW-9S).
- Five on-site well samples (MW-5, MW-8, MW-10, MW-11, and MW-17).

The groundwater monitoring wells identified below have demonstrated more than eight consecutive quarterly sampling events below the regulatory action level for benzene (10 µg/L). Note that the regulatory action level for benzene was established at the time of approval for the Stage 2 Abatement Plan in 1998. Section 2.2 of the Stage 2 Abatement Plan states that groundwater sampling will cease when concentrations are below the regulatory action level for eight consecutive quarterly sampling events. Historical benzene data for the requested wells have been compiled in the attached **Table 1**. Arcadis requests the following wells be removed from the Groundwater Monitoring Plan:

- MW-3S
- MW-3D

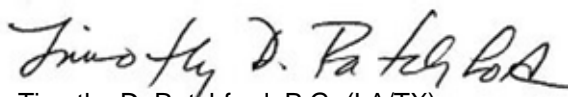
- MW-6S
- MW-6D
- MW-9S
- MW-10
- MW-11
- MW-17

Upon approval of the request to reduce the scope of the monitoring plan, the eight groundwater monitoring wells above will be abandoned in accordance with New Mexico Administrative Code 19.27.4.

On-site groundwater monitoring wells MW-5 and MW-8 shall remain in the Site's monitoring program. Monitoring of both wells will continue per the modified abatement plan and quarterly sampling will continue at both groundwater monitoring wells.

If you have any questions regarding the request, please contact the undersigned at 225-802-8261 or Mr. Scott Wagaman with the Huntsman facility at 281-719-3038.

Sincerely,
Arcadis U.S., Inc.



Timothy D. Ratchford, P.G. (LA/TX)
Associate Vice President/Regulatory Compliance Specialist

Email: tim.ratchford@arcadis.com
Direct Line: 225-802-8261

CC. Scott Wagaman – Huntsman (electronic)

Attachments:

Table 1 – Benzene Concentrations in Requested Monitoring Wells

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-3S	6/19/2003	ND
	12/17/2003	ND
	6/16/2004	ND
	12/16/2004	ND
	6/15/2005	ND
	12/16/2005	ND
	6/15/2006	ND
	12/14/2006	ND
	6/14/2007	ND
	12/17/2007	ND
	6/24/2008	<1
	1/8/2009	<1
	7/1/2009	<1
	12/10/2009	<1
	6/23/2010	<0.20
	12/7/2010	<0.20
	6/29/2011	<1
	12/14/2011	<1
	6/19/2012	<0.20
	12/11/2012	<0.20
	6/12/2013	<1
	12/4/2013	<5
	6/9/2014	<0.60
	12/10/2014	<1
	6/10/2015	<1
	9/14/2015	<1
	12/2/2015	<1
	3/7/2016	<1
	6/6/2016	<1
	9/13/2016	<1
	12/14/2016	<1
	3/7/2017	<1
	6/6/2017	<1
	9/26/2017	<1
	12/5/2017	<1
	3/6/2018	<1
	6/26/2018	<1
	9/20/2018	<1
	12/11/2018	<1
	3/5/2019	<1
	6/4/2019	<1
	9/18/2019	<1
	12/10/2019	<1
	3/17/2020	<1
	6/1/2020	<1
	9/21/2020	<1
	12/18/2020	<1
	3/8/2021	<1
	6/1/2021	<1
	9/8/2021	<1
	12/8/2021	<1
	3/8/2022	<1
	6/13/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/7/2023	<1
	6/6/2023	<1
	9/5/2023	<1
	11/20/2023	<1
	2/6/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-3D ⁽¹⁾	6/19/2003	ND
	12/17/2003	ND; ND
	6/16/2004	ND
	12/16/2004	ND
	6/15/2005	ND
	12/16/2005	ND
	6/15/2006	ND
	12/14/2006	ND
	6/14/2007	ND
	12/17/2007	ND
	6/24/2008	<1
	1/8/2009	<1
	7/1/2009	<1
	12/10/2009	<1
	6/23/2010	<0.20
	12/7/2010	<1
	6/29/2011	<1
	12/14/2011	<1
	6/19/2012	<0.20
	12/11/2012	<0.20
	6/12/2013	<1
	12/4/2013	<5
	6/9/2014	<0.60
	12/10/2014	<1
	6/10/2015	<1
	9/14/2015	<1
	12/2/2015	<1
	3/7/2016	<1
	6/6/2016	<1
	9/13/2016	<1
	12/14/2016	<1
	3/7/2017	<1
	6/6/2017	<1
	9/26/2017	<1
	12/5/2017	<1
	3/6/2018	<1
	6/26/2018	<1
	9/20/2018	<1
	12/11/2018	<1
	3/5/2019	<1
	6/4/2019	<1
	9/18/2019	<1
	12/10/2019	<1
	3/17/2020	<1
	6/1/2020	<1; <1
	9/21/2020	<1; <1
	12/18/2020	<1; <1
	3/8/2021	<1; <1
	6/1/2021	<1; <1
	9/8/2021	<1; <1
	12/8/2021	<1; <1
	3/8/2022	<1; <1
	6/13/2022	<1; <1
	9/6/2022	<1; <1
	12/6/2022	<1; <1
	3/7/2023	<1; <1
	6/6/2023	<1; <1
	9/5/2023	<1; <1
	11/20/2023	<1; <1
	2/6/2024	<1; <1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-6S ⁽¹⁾	6/19/2003	ND
	12/17/2003	ND
	6/16/2004	ND; ND
	12/16/2004	ND; ND
	6/15/2005	0.8
	12/16/2005	ND
	6/15/2006	ND; ND
	12/14/2006	11; 6.1
	6/14/2007	ND; ND
	12/17/2007	ND; ND
	6/25/2008	<1
	1/8/2009	<1
	7/1/2009	1.7; 1.8
	12/11/2009	<10,000; <10,000
	6/24/2010	<1; <1
	12/8/2010	<0.20
	6/29/2011	0.61J; <1
	12/16/2011	<1; <1
	6/21/2012	<1; <1
	12/12/2012	<0.20
	6/12/2013	<1; <1
	12/4/2013	<10; <10
	6/10/2014	<0.60; <0.60
	12/9/2014	<1
	6/10/2015	<1; <1
	9/15/2015	<1
	12/3/2015	<1
	3/7/2016	<1
	6/6/2016	<1
	9/12/2016	<1
	12/13/2016	<1
	3/8/2017	<1
	6/7/2017	<1
	9/27/2017	<1
	12/5/2017	<1
	3/6/2018	<1
	6/26/2018	<1
	9/20/2018	<1
	12/11/2018	<1
	3/5/2019	<1
	6/4/2019	<1
	9/18/2019	<1
	12/10/2019	<1
	3/17/2020	(2)
	6/1/2020	(2)
	9/21/2020	(2)
	12/18/2020	(2)
	3/8/2021	(2)
	6/1/2021	(2)
	9/8/2021	1.7
	12/8/2021	<1
	3/8/2022	<1
	6/13/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/7/2023	<1
	6/6/2023	<1
	9/5/2023	<1
	11/20/2023	<1
	2/7/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-6D ⁽¹⁾	6/19/2003	ND
	12/17/2003	ND
	6/16/2004	ND
	12/16/2004	ND
	6/15/2005	ND
	12/16/2005	ND
	6/15/2006	ND
	12/14/2006	ND
	6/14/2007	ND
	12/17/2007	ND
	6/25/2008	<1
	1/8/2009	<1
	7/1/2009	<1
	12/11/2009	<1
	6/24/2010	<0.20
	12/8/2010	<1
	6/29/2011	<1
	12/16/2011	<1
	6/21/2012	<0.20
	12/12/2012	<0.20
	6/12/2013	<1
	12/4/2013	<5
	6/10/2014	<0.60
	12/9/2014	<1; <1
	6/10/2015	<1
	9/15/2015	<1
	12/3/2015	<1
	3/8/2016	<1
	6/7/2016	<1
	9/12/2016	<1
	12/13/2016	<1
	3/8/2017	<1
	6/7/2017	<1
	9/27/2017	<1
	12/5/2017	<1; <1
	3/6/2018	<1; <1
	6/26/2018	<1; <1
	9/20/2018	<1; <1
	12/11/2018	<1; <1
	3/5/2019	<1; <1
	6/4/2019	<1; <1
	9/18/2019	<1; <1
	12/10/2019	<1; <1
	3/17/2020	<1; <1
	6/1/2020	<1
	9/21/2020	<1
	12/18/2020	<1
	3/8/2021	<1
	6/1/2021	<1
	9/8/2021	<1
	12/8/2021	<1
	3/8/2022	<1
	6/13/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/7/2023	<1
	6/6/2023	<1
	9/7/2023	<1
	11/20/2023	<1
	2/6/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-9S ⁽¹⁾	6/19/2003	ND; ND
	12/17/2003	ND
	6/16/2004	ND
	12/16/2004	ND
	6/15/2005	ND
	12/16/2005	ND
	6/15/2006	ND
	12/14/2006	ND
	6/14/2007	ND
	12/17/2007	ND
	6/24/2008	<1
	1/8/2009	<1
	7/2/2009	<1
	12/10/2009	<1
	6/23/2010	<0.20
	12/8/2010	<0.20
	6/29/2011	<1
	12/15/2011	<1
	6/21/2012	<0.20
	12/12/2012	<0.20
	6/12/2013	<1
	12/4/2013	<25
	6/9/2014	<0.60
	12/9/2014	<1
	6/10/2015	<1
	9/15/2015	<1
	12/3/2015	<1
	3/8/2016	<1
	6/7/2016	<1
	9/12/2016	<1
	12/13/2016	<1
	3/7/2017	<1
	6/6/2017	<1
	9/26/2017	<1
	12/5/2017	<1
	3/6/2018	<1
	6/26/2018	<1
	9/20/2018	<1
	12/11/2018	<1
	3/5/2019	<1
	6/5/2019 ⁽²⁾	NS
	9/19/2019 ⁽²⁾	NS
	12/11/2019 ⁽²⁾	NS
	3/17/2020	(2)
	6/1/2020	(2)
	9/21/2020	(2)
	12/18/2020	(2)
	3/8/2021	(2)
	6/1/2021	(2)
	9/8/2021	<1
	12/8/2021	<1
	3/8/2022	<1
	6/13/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/7/2023	<1
	6/6/2023	<1
	9/5/2023	<1
	12/6/2022	<1
	2/6/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-10	6/24/2010	<0.20
	6/30/2011	<1
	12/14/2011	30
	7/20/2012	12
	12/13/2012	15
	6/13/2013	2.8
	12/5/2013	<25
	6/11/2014	<0.60
	12/11/2014	<1
	6/8/2015	23
	9/16/2015	<1
	12/4/2015	<1
	3/8/2016	<1
	6/7/2016	4.6
	9/13/2016	1.6
	12/14/2016	<1
	3/8/2017	1.1
	6/7/2017	2.1
	9/27/2017	1.5
	12/6/2017	<1
	3/7/2018	<1
	6/27/2018	<1
	9/21/2018	<1
	12/12/2018	<1
	3/6/2019	<1
	6/5/2019	<1
	9/19/2019	<1
	12/11/2019	<1
	3/18/2020	<1
	6/2/2020	<1
	9/22/2020	<1
	12/18/2020	0.65J
	3/8/2021	<5
	6/1/2021	<1
	9/9/2021	<1
	12/9/2021	<1
	3/9/2022	<1
	6/14/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/8/2023	<1
	6/7/2023	<1
	9/7/2023	<1
	11/21/2023	<1
	2/7/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-11	6/22/2010	<0.20
	6/28/2011	4.7
	12/15/2011	NS
	6/19/2012	NS
	12/12/2012	NS
	6/11/2013	<1
	12/3/2013	<25
	6/9/2014	<0.60
	12/11/2014	<1
	6/9/2015	1.3
	9/14/2015	<1
	12/2/2015	<1
	3/7/2016	2.5
	6/6/2016	<1
	9/12/2016	<1
	12/13/2016	<1
	3/7/2017	<1
	6/6/2017	<1
	9/26/2017	<1
	12/5/2017	<1
	3/7/2018	<1
	6/27/2018	<1
	9/21/2018	<1
	12/12/2018	<1
	3/6/2019	<1
	6/5/2019	<1
	9/19/2019	<1
	12/11/2019	<1
	3/18/2020	<1
	6/2/2020	<1
	9/22/2020	<1
	12/18/2020	<1
	3/8/2021	<5
	6/1/2021	<1
	9/9/2021	<1
	12/9/2021	<1
	3/9/2022	<1
	6/14/2022	<1
	9/6/2022	<1
	12/7/2022	<1
	3/8/2023	<1
	6/7/2023	<1
	9/7/2023	<1
	11/21/2023	<1
	2/7/2024	<1
NMWQCC Standard (µg/L)		10

Table 1
Benzene Concentrations in Requested Monitoring Wells
Request for Reduced Scope of Monitoring
Former Brickland Refinery
Huntsman International LLC
Sunland Park, New Mexico



Well	Date	Benzene (µg/L)
MW-17 ⁽¹⁾	6/22/2010	<0.20
	6/28/2011	<1
	12/15/2011	NS
	6/19/2012	NS
	12/12/2012	NS
	6/11/2013	6.8
	12/4/2013	<25
	6/9/2014	<0.60
	12/10/2014	<1
	6/9/2015	<1
	9/14/2015	<1; <1
	12/2/2015	<1; <1
	3/7/2016	<1; <1
	6/6/2016	<1; <1
	9/12/2016	2.7; 2.5
	12/13/2016	<1; <1
	3/7/2017	1.3; <1
	6/6/2017	<1; <1
	9/26/2017	<1; <1
	12/5/2017	<1
	3/7/2018	<1
	6/27/2018	<1
	9/21/2018	<1
	12/12/2018	<1
	3/6/2019	<1
	6/4/2019	<1
	9/18/2019	<1
	12/11/2019	<1
	3/17/2020	<1
	6/1/2020	<1
	9/21/2020	<1
	12/18/2020	<1
	3/8/2021	<1
	6/1/2021	<1
	9/9/2021	2.3
	12/9/2021	<1
	3/9/2022	<1
	6/14/2022	<1
	9/6/2022	<1
	12/6/2022	<1
	3/8/2023	<1
	6/6/2023	<1
	9/7/2023	<1
	11/21/2023	<1
	2/7/2024	<1
NMWQCC Standard (µg/L)		10

Notes:

⁽¹⁾ Monitoring Wells MW-3D, MW-6S, MW-6D, MW-9S, and MW-17 and respective duplicate samples are reported in the same cell and separated by a semicolon.

⁽²⁾ Well damaged/destroyed and could not be sampled.

Results are reported in micrograms per liter (µg/L).

BOLD - Concentrations in bold type indicate levels exceed NMWQCC standards.

J - Analyte detected below quantitation limit.

Abbreviations:

ND - Not detected.

NS - Not sampled.

NMWQCC - New Mexico Water Quality Control Commission.

µg/L - micrograms per liter

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 357725

CONDITIONS

Operator: Huntsman Advanced Materials LLC 10003 Woodloch Forest Drive The Woodlands, TX 77380	OGRID:	330766
	Action Number:	357725
	Action Type:	[UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

CONDITIONS

Created By	Condition	Condition Date
michael.buchanan	Request for reduced scope of monitoring work plan at the Former Brickland Refinery is approved. Suspend sampling & analysis for benzene in the following monitoring wells, as they have demonstrated at least eight consecutive quarters well below the human health standards set in the NM WQCC: MW-3S, MW-3D, MW-6S, MW-6D, MW-9S, MW-10, MW-11, MW-17	6/28/2024