

AP - 057

**GENERAL
CORRESPONDENCE**

**DATE:
2010 - 2006**



NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

AP-57
Gen. Cor.
2010-2006

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

November 1, 2006

Hess Corporation
Attn: Drew Hall
P.O. Box 840
Seminole, Texas 79360

**RE: Stage 1 Abatement Plan (AP-57) for the Texaco New Mexico State "G" Battery #22
Unit Letter N, Section 19, T19S, R37E, Lea County, New Mexico
AP057**

Dear Mr. Hall:

The Oil Conservation Division (OCD) has received Hess Corporation's (Hess) Stage 1 Abatement Plan (AP-57) for the Texaco New Mexico State "G" Battery #22, dated October, 2006. The OCD has conducted an initial review of the Plan and cannot deem the Plan administratively complete because Hess has not submitted all the information required by Rule 19.E(3). I have attached a list of items that must be included as part of the Stage 1 Abatement Plan in accordance with Rule 19.E(3) (19.15.1 NMAC). Although the OCD cannot officially comment on technical issues until the Stage 1 Abatement Plan has been deemed administrative complete, the attached list offers some preliminary technical comments for your consideration.

Please address each item in the attached list and submit a revised Stage 1 Abatement Plan within 30 days of receipt of this letter. Once these items have been adequately addressed, then the OCD can deem the Stage 1 Abatement Plan complete. Also, after the Stage 1 Abatement Plan is complete, then the OCD will advise you regarding the required Public Notice. If you have any questions regarding this matter, please call me at 505-476-3489.

Sincerely,

Edward J. Hansen
Hydrologist
Environmental Bureau

EJH:ejh

cc: Larry Johnson; OCD; Hobbs District Office
Cliff P. Brunson, CEI, CRS; President; BBC International, Inc.; Hobbs

**AP-57: Stage 1 Abatement Plan
Administrative and Preliminary Technical Comments**

1. Please describe in detail the nature of the release; i.e., describe what was released from where and when at the site. Also, please include in the Stage 1 Abatement Plan the Form C-141 for this site. [Rule 19.E.(3)(a)]
2. Provide additional information regarding the volume of material excavated of both the G Lact Pile and the Burn Pit Rim Spoils and the landfarm(s) where the material was disposed. Also, please provide additional information regarding the depth to which the Battery Area was excavated and the landfarm(s) where the material was disposed. [Rule 19.E.(3)(a)]
3. Regarding the backfilling: this was represented to the Division as an emergency situation and you were proceeding at risk. Please indicate the purpose of the clay liner. Provide the hydraulic conductivity and the source of the material used for the clay liner. Also, provide the source of the material for backfilling the Battery Area Excavation and the Associated Pit Excavation. [Rule 19.E.(3)(a)]
4. Please indicate in Table 1 if the soil samples labeled, "MW-4", are from the currently labeled bolehole, SB-4. Also, please correct the sample date from "6/12/06" to 6/8/06 for these corresponding samples. In addition, please indicate in Table 1 if the soil sample labeled "SB-2" is from the currently labeled monitoring well, MW-1. [Rule 19.E.(3)(a)]
5. Please include a brief description of the Ogallala Aquifer specific to the site, including hydraulic conductivity, probable aquifer thickness at the site, an estimated velocity of ground water flow (these values may be obtained from regional hydrologic studies). [Rule 19.E.(3)(b)]
6. Also, provide an inventory of water wells within one mile of the site; especially those wells that could be potentially impacted by the release (these well locations may be obtained from the website of the Office of the State Engineer: <http://iwaters.ose.state.nm.us:7001/iWATERS/>). [Rule 19.E.(3)(b)]
7. MW-~~5~~⁴ and MW-6, the most downgradient monitoring wells indicate concentrations above the apparent background concentrations for various constituents (and also above the numeric ground water protection standard). Please include an east-west geological cross-section of the site and a north-south geological cross-section of the associated pit area. The cross-sections should include concentration isopleths for constituents of concern. Also, please include a site plan map with concentration isopleths for constituents of concern. [Rule 19.E.(3)(b)]

AP-57: Stage 1 Abatement Plan
Administrative and Preliminary Technical Comments

8. Please include a ground water monitoring plan that will be conducted as part of the Stage 1 Abatement Plan, including which monitoring wells will be sampled, which parameters will be analyzed, and at what frequency. The monitoring plan must include the sampling of ground water in monitoring wells even if NAPL is present. Also, please submit the ground water monitoring well construction diagrams for each well installed at the site. [Rule 19.E.(3)(c)]

9. Provide a schedule for further site investigation activities. Specifically, in the central portion of the Tank Battery Area there were TPH concentrations exceeding OCD's recommended remediation level of 100 mg/Kg (e.g., soil sample points: #4, #5, and #8) for this site. Also, in the area of the Associated Pit, TPH concentrations greater than the recommended remediation level were detected. Please indicate what further investigation will be conducted to delineate the TPH concentrations in these areas. [Rule 19.E.(3)(e)]

10. In addition, elevated concentrations of chloride were detected in SB-3, SB-4 and MW-3. Please indicate what further investigation will be conducted to delineate the chloride concentration in the vadose zone in the area of the Associated Pit. [Rule 19.E.(3)(e)]

11. Additional groundwater monitoring (e.g., MW-3) must be conducted to delineate the ground water contamination. This may also require additional ground water monitoring well to be installed at the site (e.g., downgradient of MW-6). [Rule 19.E.(3)(e)]

12. Provide the "survey" that was referenced in the letter from the abstract company that obtained the addresses of the surface owners. [Rule 19.G.(1)(a)]

AP057

11/1/06

Mailed to:

Hess Corporation
Attn: Drew Hall
P.O. Box 840
Seminole, Texas 79360

Larry Johnson
OCD Hobbs District Office
1625 N. French Drive
Hobbs, New Mexico 88240

Cliff P. Brunson, CEI, CRS
President
BBC International, Inc.
P.O. Box 805
Hobbs, New Mexico 88241-0805

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Monday, July 31, 2006 9:02 AM
To: 'Cliff P. Brunson'
Cc: Drew Hall ; Amy C. Ruth; Jennifer Gilkey
Subject: RE: NMOCD AP-57-Hess Corp. Texaco State G Lact Unit Battery 22, Monument, NM

Approved!

From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Sunday, July 30, 2006 1:57 PM
To: Price, Wayne, EMNRD
Cc: Drew Hall ; Amy C. Ruth; Jennifer Gilkey
Subject: NMOCD AP-57-Hess Corp. Texaco State G Lact Unit Battery 22, Monument, NM

Wayne,

As you know, we have played phone tag for a while so I have attached a letter requesting an extension to the deadline for the Stage 1 Abatement Plan for the above referenced site. I had wanted to inform you in person first, but was unsuccessful. As stated in the letter, we are requesting an extension to September 15, 2006 due to the additional data that we just collected, available surveying resources, and analysis. In addition, I have been selected for jury duty starting on Monday, July 31 until September 8 and not knowing if and when I will serve, I need some additional time to work with Amy in preparing the Abatement Plan.

I appreciate your understanding in this matter. Of course, we will be working on the Abatement Plan requirements and if we are able to submit it prior to September 15, we will do so. A hard copy of the letter has also been mailed to you.

If you will please reply to all with your acceptance, I would appreciate it. I will be in touch.

Regards,

Cliff

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