

**1R - 454**

**APPROVALS**

**YEAR(S):**

**2008**

## Price, Wayne, EMNRD

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**From:** Price, Wayne, EMNRD  
**Sent:** Wednesday, February 27, 2008 7:47 AM  
**To:** 'Rebecca\_Moore@oxy.com'  
**Subject:** RE: Centurion's Request for Closure 1R454 Denton Gathering Facility

Approved!

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

From: Rebecca\_Moore@oxy.com [mailto:Rebecca\_Moore@oxy.com]  
Sent: Tuesday, February 26, 2008 10:42 PM  
To: Price, Wayne, EMNRD  
Subject: Re: Centurion's Request for Closure 1R454 Denton Gathering Facility

100 tph  
Becky Moore | Compliance Coordinator |  
Centurion Pipeline L.P. |  
2200 East County Road 90 | Midland, TX 79706 |  
(office) 432.686.6805 | cell 432.978.8067.

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

From: Price, Wayne, EMNRD <wayne.price@state.nm.us>  
To: Moore, Rebecca A  
Sent: Tue Feb 26 17:38:56 2008  
Subject: RE: Centurion's Request for Closure 1R454 Denton Gathering Facility

What will the blend TPH concentration be?

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

From: Rebecca\_Moore@oxy.com [mailto:Rebecca\_Moore@oxy.com]  
Sent: Tuesday, February 26, 2008 3:38 PM  
To: Price, Wayne, EMNRD  
Cc: Chavez, Carl J, EMNRD; Johnson, Larry, EMNRD; Darrel\_Lester@oxy.com;  
Bill\_VonDrehle@oxy.com  
Subject: Re: Centurion's Request for Closure 1R454 Denton Gathering Facility

Wayne.

I should have mentioned in previous correspondence that the monitoring wells were plugged by BP. These reports are available on the OCD's web site. Also, as approved in the permit we plan to blend on-site as well as off-site disposal. Prior to initializing activities we will make notifications as outlined below.

Thanks!

Becky Moore  
Becky Moore | Compliance Coordinator |  
Centurion Pipeline L.P. |  
2200 East County Road 90 | Midland, TX 79706 |  
(office) 432.686.6805 | cell 432.978.8067.

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

From: Price, Wayne, EMNRD <wayne.price@state.nm.us>  
To: Moore, Rebecca A  
Cc: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Johnson, Larry, EMNRD <larry.johnson@state.nm.us>  
Sent: Tue Feb 26 16:05:31 2008  
Subject: RE: Centurion's Request for Closure 1R454 Denton Gathering Facility

OCD is in receipt of your request to change the operator's name from BP to Centurions PL. This request has been approved and our data base reflects the name change. In addition, you submitted DentonClosureRequest.PDF (attached) to Jack Ford dated February 15, 2008. Please note Mr. Ford has retired. All future correspondence shall be submitted to Wayne Price-OCD. With the case # 1R454 and copy the District office attention Mr. Larry Johnson.

Upon reviewing your request OCD hereby approves of the path forward with the following conditions:

1. Scenario 1-Off site disposal of impacted soil is hereby approved as shown on page 2 of the November 15, 2005 document.
2. The OCD district office in Hobbs and the landowner shall be notified one week in advance of any activities.
3. All monitor wells shall be plugged with cement grout containing at least 2-5% bentonite filled from bottom to top.
4. The site shall be restored to its' nature condition.

A final closure report shall be submitted by May 1, 2008 for OCD approval with a copy provided to the district office. Please include all waste manifest, sample results if applicable, plugging reports, photos, etc.

Please be advised that OCD approval of this plan does not relieve the owner/operator of responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

From: Rebecca\_Moore@oxy.com [mailto:Rebecca\_Moore@oxy.com]  
Sent: Tuesday, February 19, 2008 1:39 PM  
To: Price, Wayne, EMNRD  
Subject: Centurion's Request for Closure  
Importance: High

Thanks Wayne,

I apologize for the mix up but if you can see that this gets to the appropriate person we would really appreciate it. We mailed an original Friday the 15th. to Jack's attention.

<<DentonClosureRequest.PDF>>

Becky Moore | Compliance Coordinator | Centurion Pipeline L.P. | 2200 East County Road 90 | Midland, TX 79706 | (office) 432.686.6805 | cell 432.978.8067.

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**Price, Wayne, EMNRD**

**From:** Price, Wayne, EMNRD  
**Sent:** Tuesday, February 26, 2008 3:06 PM  
**To:** 'Rebecca\_Moore@oxy.com'  
**Cc:** Chavez, Carl J, EMNRD; Johnson, Larry, EMNRD  
**Subject:** RE: Centurion's Request for Closure 1R454 Denton Gathering Facility  
**Attachments:** DentonClosureRequest.pdf

OCD is in receipt of your request to change the operator's name from BP to Centurions PL. This request has been approved and our data base reflects the name change. In addition, you submitted DentonClosureRequest.PDF (attached) to Jack Ford dated February 15, 2008. Please note Mr. Ford has retired. All future correspondence shall be submitted to Wayne Price-OCD. With the case # 1R454 and copy the District office attention Mr. Larry Johnson. Upon reviewing your request OCD hereby approves of the path forward with the following conditions:

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**Sent:** Tuesday, February 19, 2008 1:39 PM  
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**Subject:** Centurion's Request for Closure  
**Importance:** High

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<<DentonClosureRequest.PDF>>

Becky Moore | Compliance Coordinator | Centurion Pipeline L.P. | 2200 East County

2/26/2008

Road 90 | Midland, TX 79706 | (office) 432.686.6805 | cell 432.978.8067.

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2/26/2008

## Price, Wayne, EMNRD

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**From:** Rebecca\_Moore@oxy.com  
**Sent:** Tuesday, February 19, 2008 1:39 PM  
**To:** Price, Wayne, EMNRD  
**Subject:** Centurion's Request for Closure

**Importance:** High

**Attachments:** DentonClosureRequest.PDF



DentonClosureRequ  
est.PDF (375 ...)

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<<DentonClosureRequest.PDF>>

Becky Moore | Compliance Coordinator | Centurion Pipeline L.P. | 2200 East County Road 90 | Midland, TX 79706 | (office) 432.686.6805 | cell 432.978.8067.

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2200 East County Road 90, Midland, Texas 79706  
Phone (432) 686-1482 Fax (432) 686-1425

February 15, 2008

Mr. Jack Ford  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Subject: Request for Closure Work Plan Approval  
Centurion Pipeline, LP – Denton Gathering System Release  
Section 11 – Township 15S – Range 37E

Dear Mr. Ford

Centurion Pipeline, LP acquired ownership of the Denton Gathering System in New Mexico from BP Pipelines, LP on July 1, 2007. The subject project has previous closure approval from the OCD dated November 22, 2005. The OCD's approval is based on information provided in BP's original closure work plan and previously submitted technical data for closure of the site.

Enclosed for your review is a copy of the original request for closure work plan approval from BP Pipelines dated November 15, 2005. Also enclosed is a copy of the OCD's approved closure work plan. Centurion Pipeline is prepared to move forward to close this project and understands the stipulation that all activities shall adhere to the work plan proposals as a condition for approval.

The three proposed closure procedures which have been outlined in the enclosed original closure work plan will achieve the objectives desired by the OCD for remediation at the site and activities will adhere to the work plan approved.

We appreciate your time and consideration. If you have any questions please call me at 432-686-1479 or email me at [Darrel\\_Lester@oxy.com](mailto:Darrel_Lester@oxy.com).

Sincerely,  
*Centurion Pipeline, LP*

A handwritten signature in black ink, appearing to read "Darrel Lester", is written over the typed name.

Darrel Lester  
HES / Regulatory Compliance Leader

enclosures



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

Oil Conservation Division

November 22, 2005

Mr. Michael R. Whelan, PG  
Environmental Manager  
Atlantic Richfield  
(A BP Affiliated Company)  
501 Westlake Park Blvd., Room 20.101D  
Houston, TX 77079

RE: Closure Work Plan  
BP Pipelines, NA - Denton Gathering System  
Section 11, Township 15 South, Range 37 East  
Lea County, New Mexico

Dear Mr. Whelan:

The New Mexico Oil Conservation Division (OCD) is in receipt of the closure work plan for the Denton Gathering System remediation project submitted by your consultant, Delta Environmental Consultants, Inc. Based upon the information provided in the closure work plan and previously submitted technical data the OCD herewith approves the procedures for closure of the site.

Previous data collected by Delta Environmental Consultants, Inc. and submitted to the OCD indicated that no ground water under the site was impacted from the pipeline spill. No further ground water investigation will be required and OCD approves the closure of the ground water investigation. The ground water monitoring wells that have been constructed on the site are approved for plugging and abandonment with the stipulation that all appropriate activities will be performed in accordance with applicable federal, state or local rules and requirements.

The three proposed closure procedures which have been submitted in the closure work plan and covered in various meetings and telephone discussions will achieve the objectives desired by OCD for remediation at the site and are herewith approved. Stipulation that all activities shall adhere to the work plan proposals is a condition for approval. A final closure report shall be submitted to the OCD Santa Fe office within 30 days after completion of closure activities.

Oil Conservation Division \* 1220 South St. Francis Drive \* Santa Fe, New Mexico 87505  
Phone: (505) 476-3440 \* Fax (505) 476-3462 \* <http://www.emnrd.state.nm.us>

Mr. Michael R. Whelan, PG  
Denton Gathering System Closure  
November 22, 2005  
Page 2

Please be advised that OCD approval of this plan does not relieve BP Pipelines NA of responsibility should remaining contaminants pose a future threat to ground water, surface water, human health or the environment. Additionally, OCD approval does not relieve BP Pipelines NA of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions contact me at (505) 476-3489.

Sincerely,



W. Jack Ford, C.P.G.  
Environmental Bureau  
New Mexico Oil Conservation Division

cc: OCD Hobbs District Office  
Mike Henn, Delta Environmental Consultants, Inc.

IR454

November 15, 2005

Mr. Jack Ford  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Subject:       **Request for Closure Work Plan Approval**  
BP Pipelines, NA - Denton Gathering System Release  
Section 11 - Township 15S - Range 37E  
Lea County, New Mexico

Dear Mr. Ford:

On behalf of Atlantic Richfield, Delta Environmental Consultants, Inc. (Delta) is pleased to submit this closure plan for your approval. This correspondence provides three scenarios that, based on previous conversations, may be used to complete on-site activities at the above-referenced site. This is predicated on the meeting that we had on June 27, 2005, your email dated August 24, 2005, and the telephone conference that took place on October 21, 2005.

As discussed previously, confirmation sample results collected from the side walls and bottom of the remedial excavation indicate that soils affected with hydrocarbon concentrations above 10 mg/kg benzene, 50 mg/kg total BTEX and 100 mg/kg TPH have been removed from the release area. These soils are stockpiled on-site. The aforementioned meets the recommended remediation corrective action as described in the New Mexico Oil Conservation Division (NMOCD) "Guidelines for Remediation of Spills, Leaks, and Releases" dated August 13, 1993, specifically Section VI, A, 1. Based on this information and previous communications, Atlantic Richfield understands that no additional soil assessment or excavation activities are warranted.

Laboratory analytical results indicate that no concentrations of petroleum hydrocarbons above New Mexico Water Quality Control Commission (NMWQCC) standard levels (as outlined in 20.6.2 NMAC, Subpart III, Section 3103) are present in the groundwater underlying the site. Based on previous communications, closure has been granted for the groundwater phase of the remediation process.

With the above soil and groundwater remediation/assessment phases complete, only the closure work plan (e.g., the backfilling of the excavation) remains an issue. The

following three closure plan scenarios are provided for your review. Atlantic Richfield requests, in advance of initiating any site closure activities, that any of the three scenarios is acceptable to the NMOCD.

#### **Closure Work Plans**

Atlantic Richfield requests NMOCD approval of the following site closure work plans, which are in accordance with Section VI, A, 2, b, i, of the NMOCD "Guidelines for Remediation of Spills, Leaks, and Releases" dated August 13, 1993.

The proper plugging and abandoning of the on-site monitor wells MW-1, MW-2, MW-3 and MW-4 will be completed prior to initiating any of the three closure plan scenarios. The P&A activities will be performed in accordance with applicable federal, state, or local requirements.

Site activities will be conducted in accordance with Occupational Safety and Health Administration (OSHA) excavation standards (29 CFR 1926) and other applicable federal, state, or local requirements. All work will be conducted under a site-specific Health and Safety Plan (HASP) that addresses the physical, process and chemical hazards that may be encountered and outline the emergency procedures for the project team.

The site closure objectives are based on current and anticipated future land use and are consistent with current land use.

#### **Scenario 1 – Off-Site Disposal of Impacted Soil**

The site activities will consist of the following:

1. The soils stockpiled on-site, identified as North Stockpile, East Stockpile and West Stockpile, totaling approximately 5,000 cubic yards, will be transported off-site and properly disposed.
2. The excavation will then be backfilled with clean material. Backfill placed in the excavation shall be compacted by construction equipment in lifts not to exceed one foot.
3. A minimum of 6 inches to one foot of topsoil will be obtained and used to cover the excavation area.
4. The excavation will be "slightly crowned" to allow for subsequent settling of the backfilled soil.

#### **Scenario 2 – Liner System – Partial Backfill of Impacted Soils**

The site activities will consist of the following:

1. The soils identified as North Stockpile, totaling approximately 2,000 cubic yards, will be transported off-site and properly disposed at a permitted facility.
2. To provide an impermeable lower barrier, a minimum of a 20-mil poly-liner will be used to line the bottom and sides of the excavation. An approximate 6-inch to 1-foot layer of sand will be placed below and above the poly-liner to prevent tears or punctures.

3. The excavation will then be backfilled with the remaining stockpiled soils (East Stockpile (1,000 cubic yards) and West Stockpile (2,000 cubic yards)); the least impacted soils (West Stockpile) will be utilized in the lower lifts. Backfill placed in the excavation shall be compacted by construction equipment in lifts not to exceed one foot. Refer to the attached proposed cross section of backfill layers.
4. The poly-liner will be folded over the backfilled soils, and a minimum 1-foot layer of clay (red bed) will be added, compacted and crowned.
5. Above that to the surface will be placed clean material.
6. A minimum of 6 inches to one foot of topsoil will be obtained and used to cover the excavation area.
7. The excavation will be "slightly crowned" to allow for subsequent settling of the backfilled soil.

**Scenario 3 – Landfarm Below 100 mg/Kg/Backfill of All Soils**

The site activities will consist of the following:

1. The soils identified as North Stockpile, East Stockpile and West Stockpile, totaling approximately 5,000 cubic yards, will be spread along the pipeline right-of-way (ROW) in lifts not to exceed one foot. A rock crusher/pulveriser may be utilized to ensure equal sizing/aeration of impacted soils.
2. The impacted soils will be periodically tilled with a tractor fitted with a disc implement to aerate the soils. Fertilizer (30-0-0) may be added to the soils and hydrated to enhance biodegradation.
3. Soil samples will be periodically field screened with a photoionization detector (PID) to monitor the reduction of petroleum hydrocarbon concentrations.
4. Once laboratory analytical results indicate that TPH concentrations (using Method identified in the confirmation samples are below 100 mg/Kg, the material will be utilized to backfill the excavation.
5. Backfill placed in the excavation shall be compacted by construction equipment in lifts not to exceed one foot.
6. A minimum of 6 inches to one foot of topsoil will be obtained and used to cover the excavation area.
7. The excavation will be "slightly crowned" to allow for subsequent settling of the backfilled soil.

As stated above, Atlantic Richfield requests a letter from your office that indicates your agreement that:

- o No further soil assessment/excavation;
- o No further groundwater assessment is required;
- o The on-site monitor wells can be properly plugged and abandoned, in advance of initiating final closure activities; and,
- o The three proposed closure work plans are acceptable.

We appreciate your time and consideration. If you have any questions please call me at 972-416-7171 or email me at [mhenn@deltaenv.com](mailto:mhenn@deltaenv.com). You can also contact Mike Whelan with Atlantic Richfield at (281) 366-7485 / [whelamr@bp.com](mailto:whelamr@bp.com).

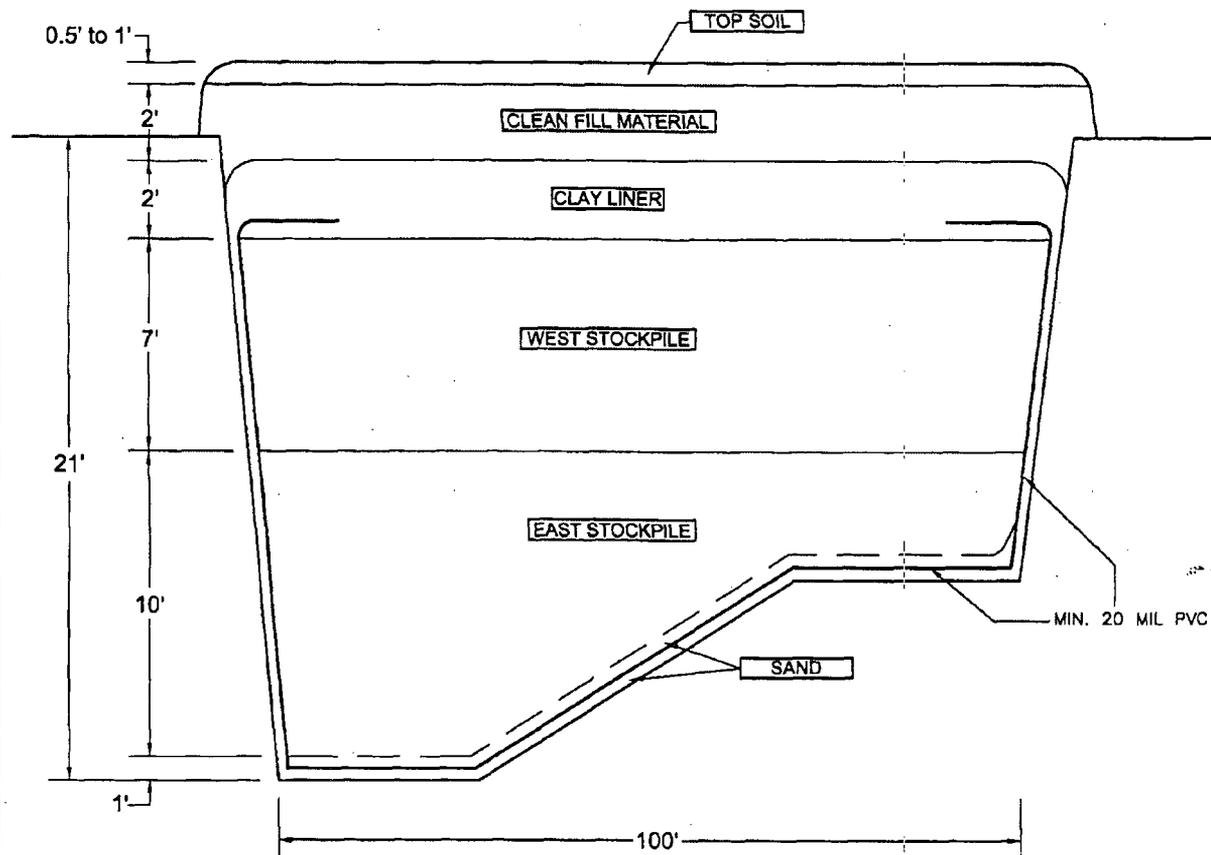
Respectfully,

**DELTA ENVIRONMENTAL CONSULTANTS, INC.**

Michael Henn  
Project Manager

Attachment - Cross Section of Backfill Layers

cc: Mike Whelan - Atlantic Richfield  
Jim Lucari - BP Legal



**CAPACITIES**

TOP SOIL.....	300	YD. <sup>3</sup>
CLEAN FILL MATERIAL.....	1,500	YD. <sup>3</sup>
CLAY LINER.....	500	YD. <sup>3</sup>
WEST STOCKPILE.....	2,000	YD. <sup>3</sup>
EAST STOCKPILE.....	1,000	YD. <sup>3</sup>
SAND.....	150	YD. <sup>3</sup>

**NOTES:**

- 1.) CAPACITIES ARE APPROXIMATE.
- 2.) DRAWING NOT TO SCALE.

**FIGURE  
STOCKPILE SAMPLING CROSS SECTION  
BP PIPELINES (NORTH AMERICA)  
DENTON GATHERING  
LOVINGTON, NEW MEXICO**

PROJECT NO. G09RT	PREPARED BY MH	DRAWN BY DD	 <b>Delta</b> Environmental Consultants, Inc.
DATE 11/10/05	REVIEWED BY	FILE NAME G09RT-Sec	