

GW - 286

**GENERAL
CORRESPONDENCE**

YEAR(S):
2002 - 1997

Price, Wayne

From: VanRyn, Frank [VanrynF@kochind.com]
Sent: Friday, May 10, 2002 4:13 PM
To: 'wprice@state.nm.us'
Cc: Schneeberger, Chad
Subject: Koch Pipeline Company - Crouch Station, Lea County, NM

As a follow-up to our phone call yesterday, I have verified some information pertaining to Crouch Crude Oil Station (Section 18, Township 18S Range 36E). You had asked to inspect the station as part of renewing the discharge permit. The current expiration date of the permit is September 24, 2002.

Koch Pipeline personnel confirmed that the tanks and other station equipment have been removed from the location. The only remaining equipment is the system associated with remediation activities. Koch Pipeline has submitted a work plan for closure of remediation activities to Mr. William Olson with the NM Oil Conservation Division. If approval is given in the near future, Koch Pipeline will complete the closure and provide the closure report to Mr. Olson prior to expiration of the discharge permit.

Therefore, Koch Pipeline request that you terminate the discharge permit for the station. Please contact me if you need additional information. Koch Pipeline will work with Mr. Olson to obtain closure of the site prior to September 24, 2002. I appreciate your guidance on this matter.

Frank Van Ryn
Reiss Remediation, Inc.
> * Telephone: 316.828.2146
> * Cell Phone: 316.209.7509
> * Fax: 316.828.4034
> * Email: vanrynf@kochind.com
>
>

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/18/98,

or cash received on _____ in the amount of \$ 575.00

from Koch

for Crouch Sta GW-286

Submitted by: _____ Date: _____

Submitted to ASD by: R. Chandel Date: 3/22/98

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

KOCH
HYDROCARBON COMPANY
Division of Koch Industries, Inc.
BOX 29
MEDFORD, OKLAHOMA 73759

FIRST NATIONAL BANK
OF MEDFORD
MEDFORD, OKLAHOMA
86-377/1031



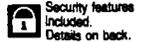
3/18/98

PAY TO THE ORDER OF NMED WATER QUALITY MANAGEMENT

\$ **575.00

Five Hundred Seventy-Five and 00/100*****

DOLLARS



KOCH HYDROCARBON CO. PETTY CASH FUND

MEMO CROUCH STA. SEC 18,T18S, R36E

DeLoani Lewis
Joan Shire

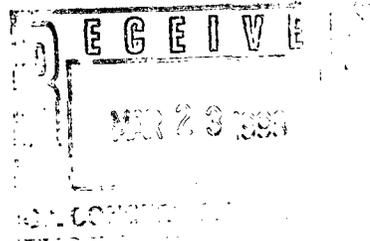
GW-286



KOCH

KOCH HYDROCARBON COMPANY

February 18, 1998



Roger Anderson
Oil Conservation Division
2040 South Pacheco Street
Sante Fe, New Mexico 87505

RE: **Discharge Plan Fee GW-286**
Crouch Crude Pump Station

Dear Mr. Anderson:

Enclosed please find a check in the amount of \$575.00 (check # 22011) for Crouch Crude Pump Station's discharge plan GW-286. Submittal of this \$575 flat fee is in accordance with the Water Quality Control Commission Regulation (WQCC) 3114.

If you have any questions or need any additional information please call me at (580) 395-2377.

Respectfully,

A handwritten signature in cursive script, appearing to read "Cody Greenfield". The signature is written in black ink and is positioned above the printed name and title.

Cody Greenfield
Compliance Manager



BOX 29
MEDFORD, OKLAHOMA 73759

FIRST NATIONAL BANK
OF MEDFORD
MEDFORD, OKLAHOMA
86-377/1031

3/18/98

PAY TO THE ORDER OF NMED WATER QUALITY MANAGEMENT

\$ ****575.00**

Five Hundred Seventy-Five and 00/100*****

DOLLARS

Security features included. Details on back

KOCH HYDROCARBON CO. PETTY CASH FUND

MEMO CROUCH STA. SEC 18,T18S, R36E

DeLanni Lewis
Joan Shire

check to RA 3/23/98
JJ

© 1994, 1995 INTUIT #726 1-800-43-34810



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-259-029

Mr. Paul Holland
Koch Oil Company
P.O. Box 1200
Hobbs, New Mexico 88240

**RE: Discharge Plan Fees GW-286
Crouch Crude Pump Station
Lea County, New Mexico**

Dear Mr. Holland:

On September 24, 1997, Koch Oil Company received, via certified mail, a letter from the New Mexico Oil Conservation Division (OCD) stating that the discharge plan GW-286 for Crouch Crude Pump Station was approved. In that letter it also stated that, in accordance with Water Quality Control Commission Regulation (WQCC) 3114, a \$50 filing fee and a \$575 flat fee were required upon receipt of the approval letter. The \$50 filing fee was received by the OCD on July 31, 1997. As of this date, there is a remaining amount of \$575. Please submit the remaining \$575 flat fee in full by March 17, 1998.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

If you have any questions, please contact me at (505)-827-7152 or Mark Ashley at (505) 827-7155.

Sincerely,

Roger Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office

P 288 259 038

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

P 288 259 029

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Legal Notice

Notice of Publication

and numbered ~~XXXXXX~~

~~XXXXXXXXXXXX~~

~~XXXXXXXXXXXXXXXXXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXX XXXX XXXX XXXX XXXX~~

~~XXXXXXXXXXXXXXXXXXXX~~ for one (1) day

~~XXXXXXXXXXXXXXXXXXXX~~ beginning with the issue of

August 1, 19 97

and ending with the issue of

August 1, 19 97

And that the cost of publishing said notice is the sum of \$ 46.80

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 22nd

day of August, 19 97

Jean Sevier

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 98

LEGAL NOTICE
NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
ENERGY, MINERALS
AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-286) - Koch Oil Company, Mr. Paul Holland, (505)-393-1854, P.O. Box 1200, Hobbs, NM, 88240, has submitted a Discharge Plan Application for their Crouch crude oil pump station located in Section 18, Township 18 South, Range 36 East, NMPM, Lea County, New Mexico. Waste water is collected in a closed top tank and disposed of

offsite. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 343 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may

be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1997.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director

SEAL
Published in the
Lovington Daily Leader
August 1, 1997.

OK MM
8-29-97

The Santa Fe New Mexican

Since 1849. We Read You.

NM OIL DIVISION

AD NUMBER: 674301

ACCOUNT: 56689

LEGAL NO: 62126

P.O. #: 96-199-002997

164 LINES ONCE at \$ 65.60

Affidavits: 5.25

Tax: 4.43

Total: \$ 75.28

AFFIDAVIT OF PUBLICATION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July 1997.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #62126
Pub. August 1, 1997

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 62126 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 1 day of AUGUST 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 1 day of AUGUST A.D., 1997

Notary Laura J. Hardig
Commission Expires 8/23/97

OK MA
8-11-97

334

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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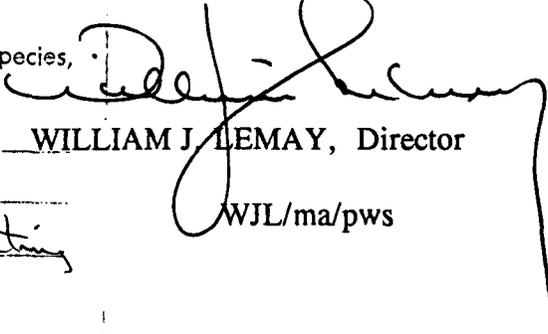
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1997.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**

NO EFFECT FINDING

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date **SEAL 8/4/97**


WILLIAM J LEMAY, Director

Consultation # **GW0CD-97-1**

Approved by 

WJL/ma/pws

**U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO**

FAXED
7/23/97

KOCH

KOCH OPERATIONS GROUP

ENVIRONMENTAL SERVICES

July 23, 1997

Mr. Richard Goodyear
New Mexico Environmental Department
Air Quality Bureau
P.O. Box 26110
Santa Fe, NM 87501

RE: Crouch Station
Koch Oil Company

Dear Mr. Goodyear:

As per our conversation on July 16, 1997, permission was given to operate the soil vapor extraction (SVE) system at Crouch with a "locked" valve setting and operating below de minimis levels. In order to determine the appropriate valve setting, a subsequent test must be conducted. The system will again be started temporarily, to collect air samples. Approximately 4 air samples will be collected corresponding to different valve settings. The system will again be shut down until the lab results have been obtained. I will generate a curve correlating the valve setting vs. concentration to determine which valve setting is appropriate. If the system would emit between 10 and 25 tons per year, a Notice of Intent (NOI) would be submitted. However, if the system operates below 10 tons per year, the system will be re-started and the valve setting locked. I will send you all of the lab data, curves, calculations, and a picture of the system showing a lock on the valve.

If there is any discrepancies from our conversation, please call me by July 25th, otherwise, I will send you the results as indicated above. Thank you for your cooperation and help in this matter.

Sincerely



Dana Kuchenbecker
Environmental Engineer
KOG Environmental Services

cc: Paul Holland, Koch
Mike Hallgarth, Koch
Roger Anderson, NMOCD
Wayne Price, NMOCD
Bernie Bockish, Western Technologies



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 29 _____, 1997

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. **Publisher's affidavit in duplicate.**
2. **Statement of cost (also in duplicate.)**
3. **CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than August 5, 1997.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

Z 765 962 P31



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No. Lovington Daily Leader	
P.O., ⁵ and ⁷² Code P.O. Box 1717	
Postage Lovington, NM 88260	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date MARK	

PS Form 3800, March 1993



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 29 _____, 1997

THE NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997

ATTN: Betsy Perner

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

- 1. Publisher's affidavit.*
- 2. Invoices for prompt payment.*

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on Friday, August 1, 1997.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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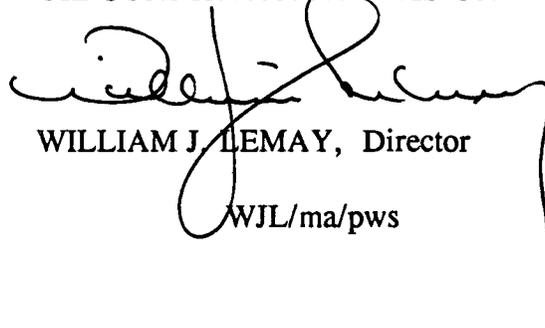
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

WJL/ma/pws

S E A L

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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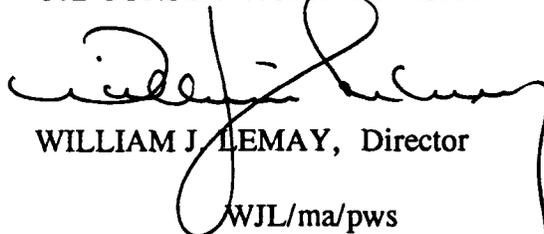
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director
WJL/ma/pws

S E A L

OH-288

JUL 21 1997

July 17, 1997

Mr. Roger C. Anderson
Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: Discharge Plan
Koch Oil Company, Crouch Crude Oil Transfer Station
Lea County, New Mexico

Dear Mr. Anderson:

Enclosed please find a check for the \$50.00 application fee and an original and one copy of the Application form and Discharge Plan for the Koch Oil Company's Crouch Crude Oil Transfer Station. A copy of the Discharge Plan is also being sent to the OCD Hobbs District Office.

If you have any questions, please contact me at 393-1854.

Sincerely,



Paul L. Holland
Team Leader

Enclosure:

xc: OCD Hobbs District Office
Dana Kuchenbecker, KOG-Environmental Services

District I - (505) 393-0101
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

OLV-288

Revised 12/1/96
Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS
(Refer to the OCD Guidelines for assistance in completing the application)

New

Renewal

Modification

1. Type: Crude Oil Transfer Station
2. Operator: Koch Oil Company
Address: P.O. Box 1200 Hobbs, New Mexico 88240
Contact Person: Mr. Paul Holland Phone: 505/ 393-1854
3. Location: _____/4 _____/4 Section 18 Township 18S Range 36E
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Paul Holland Title: Team Leader
Signature: Paul Holland Date: 7-18-97

Discharge Plan
Koch Oil Company
Crouch Station
Lea County, New Mexico

The following discharge plan has been prepared to fulfill the requirements of Section 3-106 and 3-107 of the WQCC regulations.

1. Type of Operations:

Crouch Station is a crude oil transfer facility (SIC 4612) located in Lea County, New Mexico. Crude oil is received at the facility from one oil company and is transferred to another oil company via underground pipelines. Within Crouch Station, the crude oil is pumped into one of two aboveground storage tanks. The crude oil is sent into the pipeline system through one of two LACT units.

2. Operator/Legally Responsible Party & Local Representative:

Operations Contact: Mr. Paul Holland
Koch Oil Company
P.O. Box 1200
Hobbs, New Mexico 88240
(505) 393-1854

Environmental Representative: Ms. Dana Kuchenbecker
Koch Operations Group
Environmental Services
P.O. Box 2256
Wichita, Kansas 67201
(316) 828-6960

3. Location of Facility:

Crouch Station is located off of State Highway 483, east of Hobbs, New Mexico. The legal description is Section 18, Township 18 South, Range 36 East, Lea County, New Mexico. (See the attached Vicinity Map and Quadrangle Map)

4. Landowners:

The facility is located on New Mexico State land.

5. Facility Description:

The Crouch facility is an unmanned crude oil transfer station. The facility consists of two aboveground storage tanks, three pumps, and two LACT units. There is both aboveground and underground piping. The facility is surrounded by a five strand barbed wire fence with one gate. (See the attached drawings)

The two aboveground crude oil storage tanks are constructed on raised pads. The capacity of each tank is 15,000 barrels. Both tanks are located within a bermed area.

The facility does not have discharge locations, disposal facilities, nor drum storage areas.

6. Materials Stored or Used at the Facility:

Crude oil (liquid) is stored in two aboveground storage tanks. The capacity of each tank is 15,000 barrels.

See the attached drawings for the location of the tanks within the facility. MSDSs for the crude oil, both sweet and sour, are available. Copies are kept at Crouch Station.

7. Sources and Quantities of Effluent and Waste Solids Generated at the Facility:

Sewage: The facility is unmanned and does not have any type of sewage discharge.

Stormwater: Discharge of stormwater from secondary containment structures is not required due to the small amounts of precipitation and the practice of allowing for evaporation rather than discharge.

Wastes from Operations: Waste generated during maintenance activities (such as painting, pump repair, etc.) is handled, and disposed of by the subcontractor doing the maintenance work. Tank bottoms are removed and disposed of by the oil company that sends the crude oil to Crouch Station, Tex/New Mex Oil Company.

A crude oil leak which occurred on October 16, 1996 resulted in 1,953 cubic yards of hydrocarbon contaminated soils.

8. Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures:

No wastes are stored on site.

1,953 yards of hydrocarbon contaminated soils were removed and disposed off site at a state-approved disposal facility, Gandy Marley in Chaves County, New Mexico. Their address is P.O. Box 1658, Roswell, NM 88202.

9. Proposed Modifications:

The East Tank will be taken out of service, dismantled, and removed. The West Tank will have an internal floating roof installed.

A soil vapor extraction system is to be installed to remediate soils impacted by the October 1996 leak. A work plan for the remediation has been submitted to the New Mexico Oil Conservation Division.

10. Inspection, Maintenance and Reporting:

The Crouch facility is inspected daily; however, there are no disposal units onsite.

Precipitation is contained in the bermed area. Discharge of stormwater from secondary containment structures is not required due to the small amounts of precipitation and the practice of allowing for evaporation rather than discharge.

11. Spill/Leak Prevention and Reporting Procedures (Contingency Plans):

The storage tank area is surrounded by a secondary containment berm made of compacted dirt, shell, rock and caliche. The berm dimensions are 300 feet by 147 feet. The berm is about 5 feet tall and the base is 9 to 10 feet wide at the bottom, resulting in a total volume of 35,000 barrels. Each tank sits on tar paper on top of a one foot thick square raised pad made of compacted caliche which extends about one foot beyond the tank edge. The pad construction provides an impermeable base for the tanks and allows for efficient visual inspection for leaks during daily rounds.

All underground piping is part of the process lines. The steel piping is 6 inch diameter with .25 inch walls. It was installed in 1973 and 1974. Some sections were replaced in 1993 and 1996. The steel piping has anode beds for cathodic protection.

The source of any leaks will be identified and isolated and contaminated soils removed for disposal.

Releases to the environment will be reported as follows:

Release to Water

A release impacting a waterway is unlikely due to the lack of surface water in the area. However, should a release to a waterway occur which causes a sheen the facility manager will report the release immediately to the New Mexico Health and Environmental Department and the New Mexico Oil Conservation Division District Office.

Reports will be made to:

New Mexico Health and Environmental Department
Environmental Improvement Division
Harold Runnels Building
1100 St. Francis Drive
Santa Fe, NM 87503
(505) 827-2917 (8am to 5pm)
(505) 827-9329 (24 hr)

and

New Mexico Oil Conservation Division
District 1 Office
1000 W. Broadway
Hobbs, NM 88240
(505) 393-6161

The National Response Center (NRC)
Washington, D.C.
(800) 424-8802

A follow-up written notification will be made to the above address within 10 days of discovery of the release.

Release to soils

1. Releases greater than 25 barrels to the soil will be reported immediately to the New Mexico Oil and Conservation Division Office. A written report will be submitted within 10 days.
2. A release greater than 5 barrels but less than 25 barrels to the soil will be reported in writing within 10 days to the New Mexico Oil Conservation Division. No telephone notification is required for releases to soil of less than 25 barrels.

12. Site Characteristics:

There are no navigable waters within one mile of the facility and there are no known water wells within a quarter mile.

Depth to ground water is approximately 53 to 55 feet. Data is taken from boring logs drilled on April 23, 1997 by Western Technologies, Inc. for Koch Oil Company.

An average concentration of Total Dissolved Solids (TDS) in the area ground water is 343 mg/L. This value was calculated based on electrical conductivity data from area wells and an equation provided by Mr. Kenneth Fresquez with the New Mexico State Engineer Office, District Two, Water Rights Section.

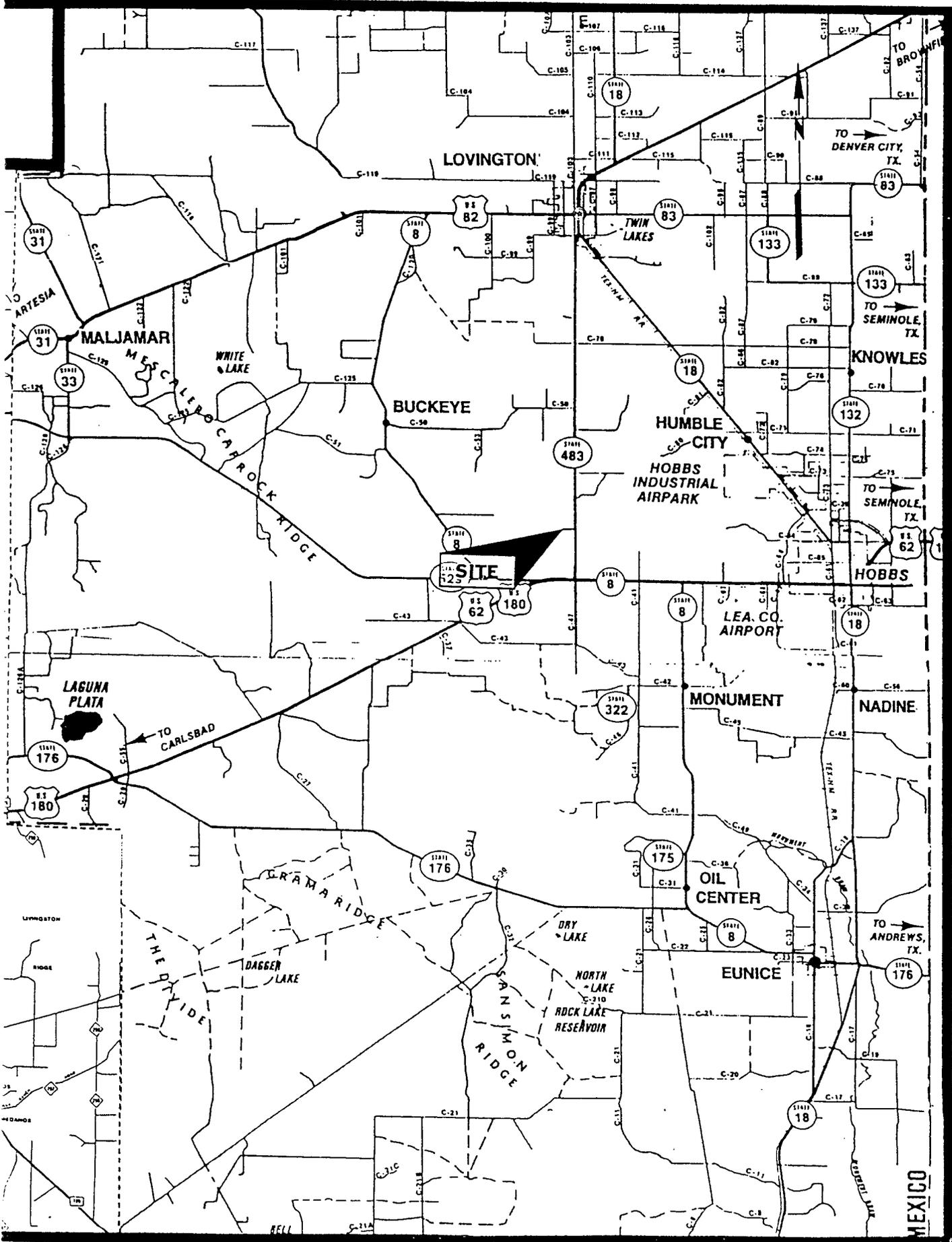
The soil types in the area are sandy clay and silty sand with gravel and cobbles (see attached boring logs).

The Ogallala Aquifer is the closest source of potable ground water beneath the site. Its depth is approximately 57 feet below ground and it extends down to about 230 feet. The composition of the Ogallala is a caliche with gravel. (information source: Mr. Kenneth Fresquez with the New Mexico State Engineer Office, District Two, Water Rights Section)

Flooding potential is minimal to non-existent.

13. Other Compliance Information:

A soil vapor extraction system is to be installed to remediate onsite soils impacted by the October 1996 leak. A work plan for the remediation has been submitted to the New Mexico Oil Conservation Division. A letter to Mr. Roger Anderson, Environmental Bureau Chief, New Mexico Oil Conservation Division, is attached. This letter describes the history of the leak and cleanup efforts.



DATE DRILLED: 04-23-1997

LOCATION:

DRILL RIG TYPE: CME-75

BORING NO. MW-1

ELEVATION: Not Determined

BORING TYPE/SIZE: HSA/7"

FIELD GEOLOGIST: R. Weaver

THIS SUGGESTION APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. CONDITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THESE LOCATIONS WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

SAMPLE					DEPTH (FT.)	USCS	GRAPHIC	SOIL DESCRIPTION
OVM READING (PPM)	TYPE	INTERVAL	IDENTIFIER NUMBER	BLOW COUNT				
2.6	N				5	SM	SILTY SAND; With Gravel And Cobbles, Dry, Light Brown, Loose. Highly Cemented (Caliche). Reddish Light Color. Trace Cobbles.	
N/A	N				10			
2.8	N			50	15			
2.1	N			50	20			
2.1	N			50	25			
1.6	N			37	30			SP
1.6	N			37	35			
								(this soil will be continued on the next page)

GROUNDWATER ENCOUNTERED NO: _____ YES: DEPTH: 35' DATE: 04-23-1997

NOTES N/A = No Recovery.

KOCH PIPELINE L.P.	
Boring Log	
Western Technologies Inc.	
Job No.: 3287JX124	Plate:

DATE DRILLED: **04-23-1997**
 DRILL RIG TYPE: **CME-75**
 BORING TYPE/SIZE: **HSA/7"**

BORING NO. MW-1

LOCATION:
 ELEVATION: **Not Determined**
 FIELD GEOLOGIST: **R. Weaver**

THIS SUMMARY APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. CONDITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THIS LOCATION WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

SAMPLE					DEPTH (FT.)	USCS	GRAPHIC	SOIL DESCRIPTION
DVM READING (PPM)	TYPE	INTERVAL	IDENTIFIER NUMBER	BLOW COUNT				
1.0	N			28	45 50 55 60	SP	[Stippled Pattern]	(this soil has been continued from the previous page)
	N			26				
	N			20				
	N			26				
Boring Completion At 62 Feet								

GROUNDWATER ENCOUNTERED NO: YES: DEPTH: 53' DATE: 04-23-1997
 NOTES **N/A = No Recovery.**

KOCH PIPELINE L.P.
 Boring Log
Western Technologies Inc.
 Job No.: 3287JX124 Plate:

THIS SUMMARY APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. CONDITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THIS LOCATION WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

DATE DRILLED: **04-23-1997** LOCATION:
 DRILL RIG TYPE: **CME-75** BORING NO. **MW-2** ELEVATION: **Not Determined**
 BORING TYPE/SIZE: **HSA/7"** FIELD GEOLOGIST: **R. Weaver**

SAMPLE					DEPTH (FT.)	USCS	GRAPHIC	SOIL DESCRIPTION
OVM READING (PPM)	TYPE	INTERVAL	IDENTIFIER NUMBER	BLOW COUNT				
252	N			18	SM		SILTY SAND; With Gravel And Cobbles, Brown, Loose. Highly Cemented (Caliche), Tan, With 1/2" To 3/4" Gravel. No Staining.	
285	N			50				
146	N			50				
47	N			50				
4.1	N			25				
	N			50				
119	N			50				SP
				40	(this soil will be continued on the next page)			

GROUNDWATER ENCOUNTERED NO: _____ YES: <input checked="" type="checkbox"/> DEPTH: <u>55'</u> DATE: <u>04-23-1997</u> NOTES N/A = No Recovery.	KOCH PIPELINE L.P.	
	Boring Log	
	Western Technologies Inc.	
	Job No.: 3287JX124	Plate:

THIS SUMMARY APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. COMPOSITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THIS LOCATION WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

DATE DRILLED: **04-23-1997** LOCATION:
 DRILL RIG TYPE: **CME-75** **BORING NO. MW-2** ELEVATION: **Not Determined**
 BORING TYPE/SIZE: **HSA/7"** FIELD GEOLOGIST: **R. Weaver**

SAMPLE					DEPTH (FT.)	USCS	GRAPHIC	SOIL DESCRIPTION
OVN READING (PPM)	TYPE	INTERVAL	IDENTIFIER NUMBER	BLOW COUNT				
111	N			26	45	SP	(this soil has been continued from the previous page)	
20.2	N			50	50			
22.0	N			50	55			
12.2	N			18	60			
Boring Completion At 65 Feet								

GROUNDWATER ENCOUNTERED NO: _____ YES: DEPTH: 55' DATE: 04-23-1997
 NOTES N/A = No Recovery.

KOCH PIPELINE L.P.
 Boring Log
Western Technologies Inc.
 Job No.: **3287JX124** Plate:

June 17, 1997

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: Notification of Groundwater Impact
Koch Pipeline Co. L.P.'s Crouch Station

Dear Mr. Anderson:

I am following up with written notification and a summary of activities as you requested from our conversation on 6/13/97. On 6/13/97 I called and notified you of groundwater impact at the above referenced site after obtaining lab analysis, as requested by Wayne Price of NMOCD. Mr. Price has been involved with the project from the beginning.

On October 16, 1996 a leak occurred in the crude oil pipeline connected to the storage tanks at Crouch Station, inside the berm. The NMOCD was notified and Mr. Wayne Price responded to the call. The product was contained inside the berm and a vacuum truck was used to recover the oil. In addition, approximately the top foot of soil inside the berm was excavated and placed on a lined cell on-site. The soil was then disposed of at a state-approved disposal facility, Gandy & Marley. Safety and Environmental Solutions (SES) used a drill rig to horizontally and vertically delineate the impacted area. The report written by SES is enclosed.

I then spoke with Mr. Wayne Price about addressing the contamination remaining at the site. The contamination was limited to the vicinity directly where the leak occurred. A soil vapor extraction system (SVE) was proposed and agreed upon. A work plan was drafted and submitted to Mr. Price for approval. He accepted the work plan with a minor change and additional comments. Mr. Price requested that a monitor well (MW-1) be installed just outside the berm to determine if groundwater had been impacted. Both the work plan and his addendums are enclosed.

Western Technologies was hired to design the SVE system and install the monitor well. On April 22, 1997 field activities were initiated. The monitor well was installed with Mr. Price and myself on-site during the installation. The photoionization detection instrument (PID) did not detect vapors in any of the samples. In addition, no staining, smell, or sheen was observed on any of the cores, or in the groundwater sample. An air inlet well boring was installed, but converted to a monitor well (MW-2) due to the depth and the presence of vapors. However, due to the weather, field activities were ended and MW-2 could not be sampled. The lab analysis from MW-1 revealed the presence of benzene and gasoline range organics (GRO) but did not detect any diesel range organics (DRO). I called Mr. Price on May 12, 1997 to discuss the results with him. Typically, crude oil is most appropriately characterized by the DRO test and does not contain high levels of benzene. As I mentioned above, the lab results indicated just the opposite. I requested to resample MW-1 to verify that the groundwater indeed was impacted prior to notifying the Environmental Bureau Chief, Roger Anderson. Mr. Price agreed to resampling the MW-1.

Field activities commenced and were completed during the week of May 19-23, including sampling of both monitor wells. The SVE pilot study was conducted and 1 air sample was collected. Permission to conduct the pilot study was granted by Mr. Satya Neelakantan of the Air Quality Bureau on 5/22/97. I reviewed the laboratory results on 6/13/97 and notified Mr. Price by telephone of the results and then notified the Mr. Anderson by telephone the same day. All of the laboratory results are included.

Currently, the SVE system is not operating due to exhaust emissions calculated from the pilot study. I am working with Mr. Neelakantan to address this issue. I have proposed a slight modification of the system to him, so that an air permit will not have to be issued. I have stressed the importance of time so that the remediation process may begin. I will notify you after I receive a reply from the Air Quality Bureau.

Please call me at (316) 828-6960 if you have any questions.

Sincerely,

Dana Kuchenbecker
Environmental Engineer
KOG Environmental Services

Enclosures: SES Report
Work Plan prepared by Koch Environmental Services
Addendums to Work Plan from Mr. Price
Laboratory results
Correspondence to Air Quality Bureau

cc: Paul Holland, Koch Pipeline Co., L.P., 2121 French Drive, Hobbs, NM 88241
Bernie Bockish, Western Technologies, 8305 Washington Place, N.E. Albuquerque, NM 87113
Wayne Price, NMOCD District Office, P.O. Box 1980, Hobbs, NM 88241-1980



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

March 21, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-921

Ms. Dana Kuchenbecker
Koch Operations Group
P.O. Box 2256
Wichita, Kansas 67201

Re: Crouch Station
Sec. 18, T18S, R36E
Lea County, New Mexico

Dear Ms. Kuchenbecker:

Under the provision of the Water Quality Control Commission (WQCC) Regulations you are hereby notified that the filing of a discharge plan is required for the Crouch Station located in Lea County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3104 and 3106 of the WQCC regulations. The discharge plan, defined in Section 1101.N of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request.

The Director shall allow a period of thirty days from the date of this letter for requesting an exemption from filing a discharge plan. Requests for an exemption shall be in writing and shall set forth the reasons why an exemption should be granted.

A copy of the regulations have been enclosed for your convenience. Also enclosed is a copy of the OCD guideline for the preparation of discharge plans crude stations. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

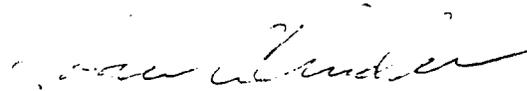
Ms. Dana Kuchenbecker
March 21, 1997
Page 2

The discharge plan is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus the flat rate of \$1380 for crude stations. The \$50 dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If you have any questions, please feel free to contact Mark Ashley at 827-7155.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office

P 288 258 921

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PS Form 3800, April 1995



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

March 4, 1997

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Dana Kuchenbecker
Environmental Engineer
KOG Environmental Services (KOG)
P.O. Box 2256
Wichita, Kansas 67201

RE: Crouch Station Remediation Proposal.

Dear Ms. Kuchenbecker,

The New Mexico Oil Conservation Division (NMOCD) Environmental Bureau has reviewed KOG's Remediation Proposal and they have requested the following requirements to be added as an addendum to the approval letter sent February 23, 1997.

The monitor well shall be installed down gradient and just outside of the dike area per KOG's original request, but the original 100 foot distance proposed shall be changed to read "as close as possible to the original leak site."

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe
NMSLO-Hobbs office.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

January 10, 1997

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Dana Kuchenbecker
Koch Operating Group (KOG)
4111 E. 37 th Street North.
Wichita, Kansas 67220

Re: Crouch Crude Oil Pipeline Station-Lea Co. NM
sec 18-Ts18s-R36e

Dear Ms Kuchenbecker,

Per your recent telephone request, KOG is hereby granted permission to dispose of the crude oil contaminated soil generated as a result of the pipeline failure on 10-16-96 at an New Mexico Oil Conservation Division (NMOCD) permitted facility.

Please note all NMOCD permitted facilities will require certain documentation such as a hazardous waste determination, certificate of waste status, and other documentation which will be approved by the NMOCD on a form C-138. This form is submitted by the permitted waste facility.

Per our telephone conversation KOG will be submitting an investigation and work plan for the remaining contaminates.

Per your request please find enclosed the following regulations and/or guidelines for your future use.

1. Subpart IV- Prevention and Abatement of Water Pollution;
Water Quality Control Commission (WQCC) Regulations.
2. Crude Oil Pump St. Discharge Plan Guidelines.

Please note modifications to any NMOCD regulated WQCC type facility requires approval from the New Mexico Oil Conservation Division (NMOCD) Environmental Bureau. Please contact Roger Anderson-Environmental Bureau Chief at 505-827-7152 concerning permitting issues.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

A handwritten signature in cursive script that reads "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe
NM ST. Land Office-Hobbs NM

attachments-2

NMOCD INTER-OFFICE CORRESPONDENCE

TO: Jerry Sexton-NMOCD District I Supervisor 7
From: Wayne Price-Environmental Engineer *Wayne Price*
Date: February 18, 1997
Reference: Koch Operations
Subject: Crouch St. Remediation Proposal

Comments:

Please find attached Koch Pipeline's Remediation Proposal for the recent large crude oil spill at their Crouch St.

After discussing with Roger Anderson and Bill Olson, they have ask me to handle.

After you have an opportunity to review please let me know how you want to handle the approval process.

Thanks!

cc: Roger Anderson-Environmental Bureau Chief
Bill Olson-NMOCD Hydrogeologist-Environmental Bureau

attachments-1 Koch Submittal dated 1/29/97

KOCH

KOCH OPERATIONS GROUP

ENVIRONMENTAL SERVICES

January 29, 1997

Mr. Wayne Price
New Mexico Oil Conservation Division
P.O. Box 1980
Hobbs, New Mexico 88241-1980

OLD HOBBS
OFFICE

FEB 03 1997

RECEIVED

RE: Crouch Station Remediation Proposal

Dear Mr. Price:

Enclosed is a copy of the proposed work plan for your review. As we discussed on the phone, I have added some items as requested by the NMOCD to the work plan. If you have any questions or comments, please call me at (316) 828-6960. I look forward to your response in the near future. Thank you for your time regarding this matter.

Sincerely,



Dana Kuchenbecker
Environmental Engineer
KOG Environmental Services

Enclosure

cc: Paul Holland, KPC, L.P.; Enclosure

**WORK PLAN
FOR
REMEDIAL INVESTIGATION OF CROUCH STATION
KOCH PIPELINE COMPANY, L.P.**

NEW MEXICO
OFFICE

FEB 03

RECEIVED

I. INTRODUCTION

This work plan proposes strategies, procedures, and methods to be used in the investigation and/or remediation of Koch Pipeline Company L.P.'s Crouch Station located in Lea County, New Mexico.

II. REGULATORY JURISDICTION

Through discussions with the New Mexico Oil Conservation Division (NMOCD) it was understood that the NMOCD has jurisdiction over the oil and gas facilities, and contamination associated with them, in the state of New Mexico. However, the Water Quality Control Commission is part of a committee which reviews pollution abatement plans when groundwater is impacted, and ultimately has final jurisdiction.

III. SITE HISTORY

Crouch Station is located in Section 18, Township 18S, Range 36E, in Lea County, New Mexico. The property was first leased from the State of New Mexico in 1974 by Koch Industries, in which the property was approved for crude oil pumping and storage operations. In 1978, the lease was transferred from Koch Industries, Incorporated to Matador Pipelines, Incorporated. In 1990, the lease was transferred to Koch Gathering where it was operated for approximately six years. In 1996, the lease was transferred from Koch Gathering to Koch Pipeline Company, L.P. and is still operational today. Currently, there are 2-15,000 barrel storage tanks, 3 pumps, and 2 tool sheds on-site.

In October of 1996, a pipeline failure occurred on a 12 inch line, which resulted in a crude oil leak inside the containment walls. The NMOCD was notified and Mr. Wayne Price from the NMOCD was present during excavation and investigative activities conducted on October 25, 1996. On January 8, 1997, Dana Kuchenbecker with Koch Operations Group (KOG)-Environmental Services contacted Mr. Price and discussed the following proposed remediation options.

IV. GEOLOGY AND HYDROGEOLOGY

The soil in the area is described as stiff caliche to a depth of approximately 15 feet, sandy caliche to a depth of approximately 40 feet, and dry water sand until the aquifer is encountered at a depth of approximately 57 feet. (Safety and Environmental Solutions conducted a water well survey and revealed groundwater at approximately 57 feet in 1991.) The groundwater is part of the Ogallala Aquifer which is the main water supply of Southeastern New Mexico, and Southwestern Texas. The NMOCD has stated that the regional groundwater flow is in a southeasterly direction.

V. SCOPE OF WORK FOR PROPOSED ACTIVITIES

It is the belief of KOG Environmental Services through the report written by Safety & Environmental Solutions, Inc. (SES) on prior investigative activities, and discussions with Koch Pipeline Company, L.P. field personnel present during response activities, that the subsurface contamination is limited to a small area with an approximate 20-foot diameter. The profile of the vertical extent of contamination revealed Total Petroleum Hydrocarbon (TPH) concentrations exceeding 1,000 ppm at depths from the surface to 15 feet below ground surface (bgs). It also revealed that concentrations significantly decreased but, were present at depths 25 feet to 40 feet in the range of 76-170 ppm. However, at the request of the NMOCD, Koch proposes to install a 2-inch monitor well downgradient, approximately 80-100 feet from the leak location. The well will be installed by a New Mexico licensed monitor well driller in accordance with appropriate State rules and regulations. The well casing will be approximately 2-inch diameter Schedule 40 PVC with a slotted screen. The screen size will be approximately 0.01 inches. At least ten feet of screen will be placed in the zone of anticipated water table fluctuation. In this case, groundwater is anticipated at approximately 57 feet. A sand or gravel filter pack will be constructed around and to the top of the well screen. The filter pack will be topped by approximately 1 to 2 feet of hydrated bentonite pellets. The remaining portion of the borehole will be filled to the ground surface around the casing with a bentonite-cement grout.

Upon well completion, the wells will be fully developed. After the water level measurement is complete, the well will be purged three well volumes or until dry, using a disposable PVC hand bailer or pump.

As stated above, through discussions with the NMOCD, the regional groundwater flow is southeasterly. Thus, the well will be installed downgradient from the leak site (See attached site map for location). A groundwater sample will be collected and analyzed for TPH and BTEX (benzene, toluene, ethyl benzene, and xylene, respectively). The sample will be rushed for lab analysis to determine if groundwater has been impacted. Depending on the results, a decision will be made in the field to do one of the following:

1. Groundwater has not been impacted:

If groundwater has not been impacted, one single Soil Vapor Extraction well (SVE) will be installed in the leak area to a depth of 40 feet. In addition 2 to 5 air supply wells will be installed to increase air flow, thus increasing the stripping efficiency and biodegradation in the subsurface. In addition, the monitor well will be left in place to verify that the system is effective for future monitoring.

2. Groundwater has been moderately impacted with dissolved phase hydrocarbons:

If free product is absent but low concentrations of dissolved hydrocarbons are present, then the SVE well will be installed and the groundwater will be monitored by collecting samples and having them analyzed by a lab quarterly for a period of two years.

3. Groundwater has been significantly impacted with hydrocarbons:

If free product is present or high concentrations of TPH or BTEX are discovered, then the "proposed remedial mode" will be switched to a complete delineation mode. A second work plan would need to be drafted where a nesting of SVE's, air sparging, Risk Based Assessment/Remediation, or combination of the above would be evaluated and proposed to the NMOCD.

VI. DECONTAMINATION PROCEDURES

Prior to drilling, all down-hole equipment will be decontaminated. In addition, all sampling tools, measuring tapes, etc. will be washed in a soap solution and rinsed with water. Disposable bailers will also be used where possible. All decontamination water will be collected and stored in DOT-approved drums and will be analyzed prior to disposal.

VII. QUALITY ASSURANCE/QUALITY CONTROL (QA/QC)

To avoid cross-contamination of samples, personnel will change gloves when sampling between borehole locations.

The laboratory QA/QC program will include an equipment blank and a trip blank. (Note: the quantity of QA/QC samples will vary depending on the results of the groundwater testing.) However, approximately 10% of the total number of samples collected will be QA/QC blanks. The blanks will be analyzed for the same parameters as the samples. With the exception of trip blanks, all other blanks will be labeled so as to mask their identity as a QA/QC sample.

Sample duplicates will be performed for soil samples by splitting the core removed from a selected depth interval in a boring and labeling as two distinct samples, if possible.

Trip blanks will be sent by the laboratory with sample kits and will be returned unopened to the lab with the sample shipment.

VII. WASTE HANDLING

Due to the fact that the waste has been characterized previously, contaminated soil will be placed on plastic sheeting inside the berm until it can be properly disposed of at a permitted facility. All purged water from well development and decontamination procedures will be stored in a DOT approved 55-gallon drum until lab results are known.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

February 23, 1997

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Dana Kuchenbecker
Environmental Engineer
KOG Environmental Services (KOG)
P.O. Box 2256
Wichita, Kansas 67201

RE: Crouch Station Remediation Proposal.

Dear Ms. Kuchenbecker,

New Mexico Oil Conservation Division (NMOCD) is in receipt of the above proposal dated January 29, 1997 for the Koch Pipeline Co., LP Crouch Station located in the NE/4 SE/4 of sec 18-Ts18s-R36e in Lea County, New Mexico.

The proposal is hereby approved with the following conditions:

1. In addition to the monitor well construction proposed, the monitor well shall have a minimum of 15 feet of screen, 10 feet in the water and five feet above the water.
2. The monitor well ground water sample taken shall be per EPA approved methods such as for BTEX (602/8020) for volatile organics. The TPH samples can be any EPA or other approved method, such as 418.1, 8015 M, etc.

The NMOCD approves KOG's plan for the above analysis to be run on the initial samples taken from the monitor well. Please note additional analysis may be required depending upon the results obtained or if ground water has been impacted.

3. During installation of the air supply wells KOG shall perform on-site sampling to further delineate the vertical and horizontal extent of the contamination. The air supply wells (soil borings) shall be sampled a minimum of every five vertical feet. These soil samples shall include TPH and BTEX. KOG shall have the option to use on-site field instruments to accomplish this task. These must be approved by NMOCD.
4. Upon completion of the soil vapor extraction (SVE) system and any monitoring systems installed, KOG will provide NMOCD a complete report to include an Introduction, Water-soil-air monitoring sampling and analysis report section, Remediation system, Conclusions and Recommendations. Figures, tables, maps, drilling logs and appendices (if required) should be included.

This report shall be due 90 days after the completion (start-up) of the SVE system and due every year (annual basis) until completion of the project.

5. At the end of the project KOG shall submit a closure plan for NMOCD approval.
6. KOG will provide NMOCD within 90 days of receipt of this letter a time schedule for disposing of the contaminated soil as proposed in VII. Waste Handling of the proposal.
7. KOG will notify the NMOCD District I office 72 hours in advance of all scheduled activities such that NMOCD has the opportunity to witness the events and/or split samples.
8. The NMOCD Santa Fe Office's Environmental Bureau Chief and the NMOCD Hobbs District I Office will be notified within 24 hours of the discovery of ground water contamination.

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

Please note the NMOCD did not receive the site map, please send for our file.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,



Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe
NMSLO-Hobbs office.