

1R - 126

**APPROVALS**

**YEAR(S):**

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**Olson, William**

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**From:** Bayliss, Randy  
**Sent:** Thursday, June 05, 2003 4:02 PM  
**To:** 'William\_VonDrehle@Eott.Com'  
**Cc:** Johnson, Larry; Olson, William  
**Subject:** Saunders Site Restoration

OCD approves your proposed modification to your May 20, 2003 work plan as described below.

We agree that soil testing results indicate some attenuation of soil TPH as shown by the cooling down of the hot spots.

I've discussed the sampling of the soil placed into the pit to provide safe access with Larry Johnson. Since Chance Johnson had tested that soil with a PID field screening method and did not detect any hydrocarbon vapors, we do not see the need for further soil testing.

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

**From:** William\_VonDrehle@Eott.Com [mailto:William\_VonDrehle@Eott.Com]  
**Sent:** Thursday, June 05, 2003 3:51 PM  
**To:** RBayliss@state.nm.us  
**Cc:** Mike\_Kelly@eott.com  
**Subject:** Saunders Site Restoration

Dear Randy,

Thank you for reviewing the sample data for the Saunders site soil samples, provided by Chance Johnson earlier today. As discussed, the hot spots previously observed at the time of original remediation have declined. It is expected that there would be continued attenuation in the future, so EOTT shares OCD's satisfaction with the effectiveness of the closure strategy approved originally.

As we discussed, composite sample # 20 was slightly above 2000 ppm. EOTT proposed that during backfill this material be mixed with loads from one of the low concentration stockpiles during backfill. This soil would be backfilled somewhat higher in the soil column during restoration, well away from the groundwater.

Thank you for review and consideration of EOTT's request. EOTT looks forward to commencing the restoration of the site shortly.

Sincerely,

Bill Von Drehle  
Director Environmental  
EOTT Energy Services

6/11/2003

## Olson, William

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**From:** Bayliss, Randy  
**Sent:** Thursday, June 05, 2003 12:18 PM  
**To:** Olson, William  
**Cc:** Johnson, Larry; Martin, Ed; Price, Wayne  
**Subject:** FW: Saunders Site Stockpile Sample Results

I spoke to Cody M about these results. We agreed that some improvements in the TPH have been shown since the summer of 2000 (when Larson sampled the stockpiles) and that in 2000 there were no BTEX issues in the 14 MW tests results. He understands that with present level of TPH (mostly < 2,000 ppm DRO) and with the condition of the TPH (weathered crude, low GRO) that 2,000 ppm TPH in soil will be immobile, provided that rainwater percolation is prevented by the clay cap, as proposed and approved.

I told him that Leon Anderson had some concerns about the proposed 2,000 ppm backfill and that we had discussed it at length in Hobbs yesterday. Leon had asked me to call Cody to relate yesterday's concerns.

We also talked about the EPI 14" EOTT line cleanup in Monument Draw and we agreed that any sort of land farming or spreading or on site treatment in the Draw was a bad idea. Cody said the SLO would be looking at on-site or in place treatment on State Land on a case-by-case basis rather than any sort of outright prohibition.

We also discussed another EOTT spill, the Hobbs Mainline Junction, where EPI is recovering PSH. I sent him a jpg of the pump operation, and pointed out the irrigation pump. He's aware that EOTT needs to delineate the extent of contamination and that there might be a lot of oily soil that needs to be removed on State Land.

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

**From:** Bayliss, Randy  
**Sent:** Thursday, June 05, 2003 11:06 AM  
**To:** Morrow, Cody  
**Subject:** Saunders Site Stockpile Sample Results

In 2003, only one sample of 23 exceeded 2,000 mg/kg -- max at 2,220 mg/kg.  
In 2000, six samples of 40 exceeded 2,000 mg/kg -- max at 3,775 mg/kg.

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

**From:** Chance Johnson [mailto:cjohnson@etgi.cc]  
**Sent:** Thursday, June 05, 2003 10:41 AM  
**To:** Randy Bayliss  
**Cc:** William\_VonDrehle@Eott.Com; Jerry Nickell  
**Subject:** Saunders Site Stockpile Sample Results



Untitled Attachment SOIL CHEM.xls



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor  
**Joanna Prukop**  
Cabinet Secretary

**Lori Wrotenberg**  
Director  
Oil Conservation Division

May 22, 2003

Mr. William Von Drehle  
EOTT Energy LLC  
PO Box 4666  
Houston, Texas 77210-4666

**RE: TNM 95-10/SAUNDERS SITE  
OCD FILE #1R-126  
MONUMENT, NEW MEXICO**

Dear Mr. Von Drehle:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy LLC's (EOTT) May 20, 2003 "SITE RESTORATION WORK PLAN, FORMER C.J. SAUNDERS EXCAVATION SITE, LEA COUNTY, NEW MEXICO, NW 1/4 OF THE SE 1/4 OF SECTION 18, TOWNSHIP 19 SOUTH, RANGE 36 EAST" and attached May 8, 2003 "DOCUMENT RECOVERY WORK PLAN" submitted on behalf of EOTT by Environmental Technology Group, Inc.(ETGI). This document contains EOTT's work plan for restoration of a formerly remediated and clay capped contamination site which is being re-excavated in a search for documents which are reportedly buried within the site. The work plan was required by the OCD when it was discovered that EOTT destroyed the sites clay cap and was re-excavating the site without notification to the OCD. The work plan proposes to restore the site in compliance with EOTT and Texaco Exploration and Production, Inc.'s (TEPI) previous site closure as outlined in Larson and Associates. Inc. February 26, 2001 "FINAL CLOSURE REPORT C.J. SAUNDERS EXCAVATION, LEA COUNTY, NEW MEXICO", and as approved with conditions by OCD on July 11, 2001.

The previous EOTT and TEPI site closure provided for placement of about 8 to 10 feet of clean soil on top of the water table, blending of contaminated soil with liquid fertilizer or Micro-Blaze prior to placement in the excavation, composite soil sampling for each 3000 cubic yards (cy) of backfill, and a installation of a two foot clay cap near the surface overlain by clean topsoil.

The OCD approves of the above-referenced work plan with the following conditions.

- 1) All backfill between the water table at 41 feet below ground surface (BGS) and 31 feet BGS shall be clean soil. Clean soil shall mean soil containing no detectable total petroleum hydrocarbons (TPH).
- 2) A composite soil sample comprised of six grab samples shall be obtained for each 3000 cy of backfill and shall be analyzed for concentrations of TPH.

- 3) If a composite soil sample contains more than 2,000 ppm TPH, the soil will be treated with liquid fertilizer or Micro-Blaze prior to backfill.
- 4) Backfill soil will be emplaced in no greater than two foot lifts and compacted until the backfill reaches approximately five to six feet BGS.
- 5) An impermeable barrier shall be installed to cover the excavation area. The barrier shall meet a hydraulic conductivity of no greater than  $10^{-7}$  centimeters per second throughout its thickness. If a clay cover is used, it shall be either two feet thick, after compaction, or compacted so as to meet or exceed 95% of a Proctor Test ASTM-D-698, as shown by three tests on the site, and have the following physical characteristics:
  - a. plasticity index greater than 10%;
  - b. liquid limit between 25% and 50%;
  - c. more than 40% by weight of the material passing a No. 200 sieve;
  - d. clay content greater than 18% by weight; and
  - e. be free of particles greater than one inch in any dimension.
- 6) The top of the clay barrier shall be graded at 1% to promote drainage of water from the excavation area.
- 7) Clean topsoil shall be placed over the clay barrier to return the excavation to the original surface elevation. The clean topsoil shall be at least three feet thick at all locations. The topsoil shall be suitable to promote re-vegetation of native grasses and other plants.
- 8) All wastes taken for offsite disposal shall be disposed of at an OCD approved facility.
- 9) EOTT shall notify the OCD Hobbs District Office at least four working days in advance of installation of the impermeable barrier and of any other major events such as initiation of work at a site and sampling events so that the OCD has the opportunity to witness the events.
- 10) EOTT shall implement measures to prevent runoff from the site during the backfilling and barrier installation operations.
- 11) Upon completion of barrier installation, EOTT shall implement site or institutional controls to protect the site from intrusion in the future. These controls may consist of signs, fencing, and notices on deeds as appropriate.

- 12) Any remaining unplugged monitor wells on the site shall be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX).
- 13) All soil and water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
- 14) EOTT shall submit a report on all remediation activities to the OCD Santa Fe Office within 60 days of completion of the work with a copy provided to the OCD Hobbs District Office. OCD encourages submittal of reports and photographs using electronic means. The report shall contain the following:
  - a. A description of all remediation activities that occurred.
  - b. A site map showing the location of the pit, impacted areas, excavated areas, sample locations, blending and stockpile locations, impermeable barrier perimeter, and any other pertinent site features.
  - c. Cross-sectional diagrams of the excavation showing the area excavated and backfilled including the clay cover and clean fill.
  - d. Information and test results showing that the clay cover was constructed according to ASTM standards and conditions listed above.
  - e. Summary tables of the results of all analytical sampling results as well as copies of laboratory analyses and associated QA/QC data.
  - f. The disposition and volume of all wastes generated and disposed of.
  - g. A description of site or institutional controls.
  - h. Photographic documentation of remediation activities.

Please be advised that OCD approval does not relieve EOTT of responsibility if the proposed work plan fails to adequately remediate contamination related to EOTT's activities. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

Also please be advised that on August 1, 2000, pursuant to Rule 116, OCD had approved a general work plan for EOTT site remediation work in New Mexico. Regarding the conditions of approval, your attention is directed to condition #6, which states "EOTT shall notify the OCD of all releases in accordance with OCD Rule 116 and shall notify the OCD Hobbs District Office of major events such as initiation of work at a site and sampling events."

Mr. William Von Drehle  
May 22, 2003  
Page 4

Upon receipt and review of the remediation report, OCD will determine if remedial activities meet the conditions of this approval and, upon a satisfactory finding, will issue a "final closure" letter.

If you have any questions or comments, please contact me at (505) 476-3491 or Randy Bayliss at (505) 476-3493.

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office  
Cody Morrow, NM State Land Office  
Rodney Bailey, ChevronTexaco, Inc.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenberg**

Director

**Oil Conservation Division**

May 16, 2003

Mr. Michael S. Kelly  
EOTT Energy Corp.  
P.O. Box 4666  
Houston, Texas 77210-4666

**RE: CASE # 1R126  
TNM-95-10/SAUNDERS SPILL SITE**

Dear Mr. Kelly:

On May 13, 2003, the New Mexico Oil Conservation Division (OCD) contacted you to discuss issues related to EOTT Energy Corp.'s (EOTT) re-excavation of the previously closed TNM-95-10/Saunders remediation site located in Unit J, Section 18, Township 19 South, Range 36 East, Lea County, New Mexico. The OCD informed you that they were concerned that the re-excavation activities were not approved by OCD and that these activities destroyed the previously approved clay cap at the site. The clay cap was installed by Texaco and EOTT to prevent future migration of remaining soil contamination at the site. In the May 13<sup>th</sup> conversation, you committed to submit a work plan within 14 days for restoration of the site upon completion of the re-excavation activities.

This letter is written as a confirmation of our discussions. According to your above commitment, EOTT shall submit the restoration work plan to the OCD by May 27, 2003. Please submit the work plan to the attention of Roger Anderson at the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office.

If you have any questions or comments, please contact me at (505) 476-3450.

Sincerely,

A handwritten signature in cursive script that reads "David K. Brooks".

David K. Brooks

Assistant General Counsel

xc: Chris Williams, OCD Hobbs District Office  
Rodney Bailey, ChevronTexaco, Inc.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

July 11, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 3771-7446**

Mr. Rodney Bailey  
Texaco Exploration & Production, Inc.  
500 N. Loraine  
Midland, Texas 79702

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 3771-7453**

Mr. Wayne Brunette  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: TNM-95-10/SAUNDERS SITE  
MONUMENT, NEW MEXICO**

Dear Sirs:

The New Mexico Oil Conservation Division (OCD) has reviewed the February 27, 2001 "FINAL CLOSURE REPORT, C.J. SAUNDERS EXCAVATION, UNIT LETTER J, SECTION 18, TOWNSHIP 19 SOUTH, RANGE 36 EAST, LEA COUNTY, NEW MEXICO" which was jointly submitted by Texaco Exploration & Production, Inc. (Texaco) and EOTT Energy Pipeline Limited Partnership (EOTT). This document contains the results of Texaco's and EOTT's installation of additional ground water monitoring wells and closure of the open excavation related to a crude oil pipeline spill and a former unlined pit at the Saunders/TNM-95-10 site. The document also requests final closure approval of the site.

The closure request as contained in the above-referenced document is approved with the following conditions:

1. Texaco and EOTT shall plug all monitor wells by pulling the casing and grouting the wells from the bottom to the surface with a cement grout containing 3-5% bentonite.
2. Texaco and EOTT shall submit a plugging report for each well to the OCD Santa Fe Office by September 11, 2001 with a copy provided to the OCD Hobbs District Office.

3. Texaco and EOTT shall notify the OCD at least 48 hours prior to the plugging activities such that the OCD has the opportunity to witness the events.

Please be advised that OCD approval does not relieve Texaco and EOTT of responsibility should remaining contaminants pose a future threat to fresh water, human health or the environment. In addition, OCD approval does not relieve Texaco and EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions or comments, please contact me at (505) 476-3491.

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office  
Mark J. Larson, Larson & Associates, Inc.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

August 22, 2000

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

**RE: TNM-95-10/SAUNDERS SPILL SITE**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) June 23, 2000 "SITE CLOSURE, TNM 95-10 (SAUNDERS) LEAK SITE, LEA COUNTY, NEW MEXICO" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document provides additional information on contaminant concentrations in the south/southwest side walls of the Saunders/TNM-95-10 excavation site and requests clarification of the basis and rationale for Texaco closing the excavation.

The OCD thanks you for providing the additional analyses from the excavated area. The OCD allowed Texaco to backfill the excavation because the contaminated soils had been physically removed to the extent practicable. While the excavation is being closed, the OCD does not consider the site remedial and investigative actions to be complete. The OCD knows that contaminated soils, in excess of the OCD guidance levels, remain in the south/southwest side walls of the excavation and therefore has required that additional ground water monitor wells and soil sampling be conducted in this area. Future remediation and investigative requirements will be based upon the information you have provided and the results of Texaco's investigations.

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

Sincerely,

  
William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office  
Rodney Bailey, Texaco Exploration and Production, Inc.  
Jerry Nickell, Environmental Technology Group, Inc.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

May 10, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 5051-3075**

Mr. Rodney Bailey  
Texaco Exploration & Production, Inc.  
205 E. Bender Blvd.  
Hobbs, NM 88240

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 5051-3068**

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

**RE: TNM-95-10/SAUNDERS SITE  
MONUMENT, NEW MEXICO**

Dear Sirs:

The New Mexico Oil Conservation Division (OCD) has reviewed the April 24, 2000 "RESPONSE TO WORK PLAN FOR SAUNDERS EXCAVATION SITE, UNIT LETTER "J", SECTION 18, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO" and May 8, 2000 "LABORATORY ANALYSES OF SOIL SAMPLES FROM STOCKPILES AND EXCAVATION, C.J. SAUNDERS SITE, UNIT LETTER "J": SECTION 18, TOWNSHIP 19 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO:" which was jointly submitted by Texaco Exploration & Production, Inc. (Texaco) and EOTT Energy Pipeline Limited Partnership (EOTT). This document contains Texaco and EOTT's work plan for backfilling the open excavation and installation of additional monitoring wells at the Saunders/TNM-95-10 site.

The work plan as contained in the above referenced documents is approved with the following conditions:

1. Soil samples shall be obtained at five foot intervals during drilling of the new monitor wells to determine the extent of residual soil contamination in the former pit area. The samples shall be obtained and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) and total petroleum hydrocarbons using EPA approved methods and quality assurance/quality control (QA/QC).

2. The completion report shall be submitted to the OCD Santa Fe Office by July 10, 2000 with a copy provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not limit EOTT and Texaco to the proposed work plan should the actions fail to adequately remediate or investigate contamination related to their activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT and Texaco of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

March 28, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-559-572-911**

Mr. Rodney Bailey  
Texaco Exploration & Production, Inc.  
205 E. Bender Blvd.  
Hobbs, NM 88240

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-559-572-912**

Ms. Lennah Frost  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: TNM-95-10/SAUNDERS SITE  
MONUMENT, NEW MEXICO**

Dear Sir/Madam:

The New Mexico Oil Conservation Division (OCD) has reviewed the February 9, 2000 "WORK PLAN FOR SAUNDERS EXCAVATION SITE: UNIT LETTER "J": SEC. 18, TOWNSHIP 19S, RANGE 37 E:" which was jointly submitted by Texaco Exploration & Production, Inc. (Texaco) and EOTT Energy Pipeline Limited Partnership (EOTT). This document contains Texaco and EOTT's joint work plan for backfilling the open excavation and installation of additional ground water monitoring wells at the Saunders/TNM-95-10 site.

The OCD has the following comments and requests for information regarding the above referenced work plan:

1. The work plan does not contain detailed information on how the clay liner will be constructed. Please provide additional information on the proposed thickness and compaction of the liner.
2. The work plan does not contain detailed information on how many soil samples will be obtained to verify that the proposed remediation levels have been met. The plan also does not specify what types of sample analyses will be conducted on these soils samples. Please provide this information.

3. The work plan does not contain information on the proposed remediation levels of benzene, toluene, ethylbenzene and xylene (BTEX) in the soils which are to be blended into the excavation. Please provide this information.
4. The work plan does not contain detailed information on the proposed monitor wells. Please provide a plan which includes detailed information on the proposed locations of the monitoring wells, well construction, well development, soil sampling and water quality sampling.

Submission of the above information will allow the OCD to complete a review of this site work plan. If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

September 2, 1999

**CERTIFIED MAIL**

**RETURN RECEIPT NO: Z-274-520-706**

Mr. Rodney Bailey  
Texaco Exploration and Production, Inc.  
205 E. Bender Blvd.  
Hobbs, New Mexico 88240

**RE: TNM-95-10/SAUNDERS SITE  
MONUMENT, NEW MEXICO**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has recently reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) May 17, 1999 "SAUNDERS EXCAVATION/TNM-95-10 CLOSURE REQUEST, FORMERLY TEXAS NEW MEXICO PIPELINE". This document contains EOTT's request for closure of the site remedial actions based upon the results of analytical sampling from recent excavation work at the site of a crude oil pipeline release at the Saunders/TNM-95-10 site.

In the above referenced document, EOTT concludes that the remaining contamination is a result of Texaco's former unlined pit at the site. The OCD approved Texaco's work plan for remediation of the former pit on August 16, 1995. The OCD has no record of Texaco completing remedial actions at the site pursuant to their approved plan. The OCD requires that Texaco submit a comprehensive report on the extent of contamination related to Texaco's pit and all remedial actions conducted by Texaco. The report shall be submitted to the OCD Santa Fe District Office by October 29, 1999 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office  
Lennah Frost, EOTT Energy Pipeline Limited Partnership



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

March 28, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-559-572-911**

Mr. Rodney Bailey  
Texaco Exploration & Production, Inc.  
205 E. Bender Blvd.  
Hobbs, NM 88240

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-559-572-912**

Ms. Lennah Frost  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: TNM-95-10/SAUNDERS SITE  
MONUMENT, NEW MEXICO**

Dear Sir/Madam:

The New Mexico Oil Conservation Division (OCD) has reviewed the February 9, 2000 "WORK PLAN FOR SAUNDERS EXCAVATION SITE: UNIT LETTER "J": SEC. 18, TOWNSHIP 19S, RANGE 37 E:" which was jointly submitted by Texaco Exploration & Production, Inc. (Texaco) and EOTT Energy Pipeline Limited Partnership (EOTT). This document contains Texaco and EOTT's joint work plan for backfilling the open excavation and installation of additional ground water monitoring wells at the Saunders/TNM-95-10 site.

The OCD has the following comments and requests for information regarding the above referenced work plan:

1. The work plan does not contain detailed information on how the clay liner will be constructed. Please provide additional information on the proposed thickness and compaction of the liner.
2. The work plan does not contain detailed information on how many soil samples will be obtained to verify that the proposed remediation levels have been met. The plan also does not specify what types of sample analyses will be conducted on these soils samples. Please provide this information.

3. The work plan does not contain information on the proposed remediation levels of benzene, toluene, ethylbenzene and xylene (BTEX) in the soils which are to be blended into the excavation. Please provide this information.
4. The work plan does not contain detailed information on the proposed monitor wells. Please provide a plan which includes detailed information on the proposed locations of the monitoring wells, well construction, well development, soil sampling and water quality sampling.

Submission of the above information will allow the OCD to complete a review of this site work plan. If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

August 26, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-235-437-324**

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

**RE: SOIL AND GROUND WATER CONTAMINATION  
TNM NO. 10/SAUNDERS SITE**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed the Texas-New Mexico Pipe Line Company's (TNMPLC) April 14, 1998 "GROUND WATER MONITORING REPORT, TNM-10-95 (AKA SAUNDERS EXCAVATION), LEA COUNTY, NEW MEXICO" which was submitted to the OCD on May 28, 1998. A review of this document shows that no remedial actions are ongoing at this site. In addition, upon a review of the files on this site, it has been noted that on February 20, 1997 the OCD sent correspondence to Mr. Edwin G. Gripp requiring that TNMPLC submit to the OCD by April 1, 1997 the following items:

1. A proposed remedial action work plan for remaining soil and ground water contamination at the site.
2. A detailed ground water monitoring plan and reporting schedule.

The OCD has no record of receiving these required plans. In order to resolve this issue, the OCD requires that TNMPLC submit the above required items to the OCD by September 11, 1998.

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

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Olson".

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Wayne Price, OCD Hobbs District Office  
Michael Hawthorne, KEI



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 20, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-269-269-260**

Mr. Edwin G. Gripp  
Texas New Mexico Pipeline Company  
P.O. Box 60028  
San Angelo, Texas 76906

**RE: SOIL AND GROUND WATER CONTAMINATION  
TNM NO. 10/SAUNDERS SITE**

Dear Mr. Gripp:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) November 6, 1996 "ENV-SAUNDERS EXCAVATION/TNM-95-10, HISTORICAL SITE SUMMARY REPORT, KEI JOB NO. 610062" and TNMPLC's attached undated "CRUDE OIL PIPELINE RELEASE RESPONSE SUMMARY REPORT". These documents contain the results of TNMPLC's investigations of the extent of contamination related to a pipeline leak and former unlined pit at TNMPLC's TNM No. 10/Saunders site in Lea County, New Mexico. The documents also contain recommendations for site monitoring and a review of applicable remedial technologies for use at the site.

Based upon a review of the above referenced documents, the OCD requires that TNMPLC submit the following items to the OCD by April 1, 1997:

1. A proposed remedial action work plan for remaining soil and ground water contamination at the site.
2. A detailed ground water monitoring plan and reporting schedule.

Please submit the above plans to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office. If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
Dwain Glidewell, New Mexico State Land Office  
J. Michael Hawthorne, KEI



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

August 19, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-269-269-192**

Mr. Edwin G. Gripp  
Texas New Mexico Pipeline Company  
P.O. Box 60028  
San Angelo, Texas 76906

**RE: ADDITIONAL INVESTIGATIONS  
TNM NO. 10/SAUNDERS SITE**

Dear Mr. Gripp:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) undated "EXCAVATION AND SOIL STOCKPILE ASSESSMENT PLAN" which was received by the OCD on July 15, 1996. This document contains TNMPLC's work plan for additional investigations of the extent of contamination related to a pipeline leak and former unlined pit at TNMPLC's TMN No. 10/Saunders site in Lea County, New Mexico.

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

1. All boreholes/temporary monitor wells will be properly plugged upon completion.
2. TNMPLC will develop each well upon completion using EPA approved procedures.
3. All wastes generated will be analyzed for RCRA hazardous waste characteristics and will be disposed of only upon prior approval by the OCD.
4. Ground water from all permanent and temporary monitor wells which do not contain free phase product will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), total dissolved solids, major cations and anions and New Mexico Water Quality Control Commission (WQCC) heavy metals using EPA approved methods.
5. TNMPLC will submit a comprehensive report on the current and prior investigations to the OCD by November 1, 1996. The report will contain:
  - a. A description of all activities which occurred during the current and previous investigations and remedial actions, including conclusions and recommendations.

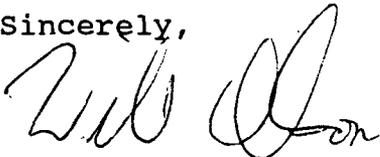
Mr. Edwin G. Gripp  
August 19, 1996  
Page 2

- b. A summary of all current and past soil and ground water laboratory analytic results including the analytical data sheets and associated quality assurance/quality control information.
  - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
  - d. A geologic log and as built well completion diagram for each current and prior borehole and/or monitor well.
  - e. A product thickness map based on the thickness of free phase product on ground water in all temporary and permanent monitor wells.
  - f. The volume of ground water and product recovered in the recovery trench system.
6. TNMPLC will notify the OCD at least 48 hours in advance of scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
  7. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve TNMPLC of liability if contamination exists which is beyond the scope of the work plan, if the activities fail to adequately determine the extent of contamination or, if the activities fail to adequately remediate contamination related to TNMPLC's activities. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
Dwain Glidewell, New Mexico State Land Office  
J. Michael Hawthorne, KEI



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

January 22, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-541**

Mr. Tony Savoie  
Texas New Mexico Pipeline Company  
P.O. Box 60028  
San Angelo, Texas 76906

**RE: GROUND WATER INVESTIGATION/REMEDIATION  
C.J. SAUNDERS FEDERAL BATTERY #1  
LEA COUNTY, NEW MEXICO**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texas-New Mexico Pipe Line Company's (TNMPLC) January 15, 1996 C-103 and accompanying January 16, 1996 "SUBSURFACE INVESTIGATION/PRODUCT RECOVERY TRENCH, FORMER PIT AND PIPELINE LEAK SITE, SAUNDERS FEDERAL BATTERY, NW SE 18 T19S R37E, LEA COUNTY, NEW MEXICO". These documents contain TNMPLC's work plan for additional investigations of the extent of contamination related to a pipeline leak adjacent to the C.J. Saunders Federal Battery #1. The documents also contain a plan for recovery of free phase liquids on ground water in excavated areas.

The above referenced work plans are approved with the following conditions:

1. All monitor wells will be constructed as set out below:
  - a. A minimum of fifteen feet of well screen will be installed, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
  - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
  - c. A 2-3 foot bentonite plug will be placed above the gravel pack.
  - d. The remainder of the hole will be grouted to the surface with cement containing 5 % bentonite.
2. TNMPLC will develop each well upon completion using EPA approved procedures.
3. All wastes generated will be disposed of only upon prior approval by the OCD.

Mr. Tony Savoie  
January 22, 1996  
Page 2

4. Ground water from the monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), major cations and anions, heavy metals and polynuclear aromatic hydrocarbons using EPA approved methods.
5. TNMPLC will submit a report on the investigation/remediation to the OCD by March 18, 1996. The report will contain:
  - a. A description of all activities which occurred during the investigation/remediation, conclusions and recommendations.
  - b. A summary of all soil and ground water laboratory analytic results.
  - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
  - d. A geologic log and as built well completion diagram for each borehole and/or monitor well.
  - e. A schedule for submission of reports on recovery operations.
6. TNMPLC will notify the OCD at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
7. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve TNMPLC of liability if contamination exists which is beyond the scope of the work plan, if the activities fail to adequately determine the extent of contamination or if the activities fail to adequately remediate contamination related to TNMPLC's activities. In addition, OCD approval does not relieve TNMPLC of responsibility for compliance with any other federal, state or local laws and/or regulations. If you have any questions, please call me at (505) 827-7154.

Sincerely,

  
William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
Dwain Glidewell, New Mexico State Land Office  
Wesley Root, Environmental Spill Control, Inc.

OIL CONSERVATION DIVISION

2040 S. Pacheco  
Santa Fe, New Mexico 87505

October 6, 1995

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-423**

Mr. Aaron Dobbs  
Texaco USA  
205 East Bender Blvd.  
P.O. Box 730  
Hobbs, New Mexico 88240

**RE: SUBSURFACE INVESTIGATION  
SAUNDERS LEASE TANK BATTERY/TNM10 SPILL SITE  
LEA COUNTY, NEW MEXICO**

Dear Mr. Dobbs:

The New Mexico Oil Conservation Division (OCD) has completed a review of Texaco's October 3, 1995 "WORKPLAN FOR A SUBSURFACE INVESTIGATION OF THE FORMER PIT AND PIPELINE LEAK SITE, NW SE 18 T19S R37E, LEA COUNTY, NEW MEXICO". This document contains Texaco's work plan for additional investigation of the extent of soil and ground water contamination related to a former unlined pit and crude pipeline spill at the Saunders Lease Tank Battery/TNM10 site.

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

1. The monitor well will be grouted from the bentonite plug to the surface with cement containing 5 % bentonite.
2. All boreholes will be plugged upon completion with cement containing 5 % bentonite.
3. All wastes generated will be disposed of at an OCD approved facility.
4. Ground water from the monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), major cations and anions, heavy metals and polynuclear aromatic hydrocarbons using EPA approved methods.

Mr. Aaron Dobbs  
October 6, 1995  
Page 2

5. Texaco will submit a report on the investigation to the OCD by December 15, 1995. The report will contain:
  - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
  - b. A summary of the laboratory analytic results of water quality sampling of the monitor wells.
  - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
  - d. A geologic log for each borehole or monitor well and as built well completion diagrams for each monitor well.
6. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve Texaco of liability if contamination exists which is beyond the scope of the work plan or if the activities fail to adequately determine the extent of contamination related to Texaco's activities. In addition, OCD approval does not relieve Texaco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Superv  
Wayne Price, OCD Hobbs Office

Z 765 962 423

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PS Form 3800, March 1993

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