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July 2, 2003, 9:54PM

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**Jury gives a victory to EOTT****Shell gets blame for pipeline spill**

By MICHAEL DAVIS

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A Midland jury found for EOTT Energy on Wednesday in its battle with Shell Oil Co. over a leaky West Texas oil pipeline that fouled the water of landowners in the area.

But EOTT's chairman said the verdict will be only the first round of this legal fight and likely will lead to more claims related to oil spills from the Texas-New Mexico Pipeline.

The case grabbed public attention when it was learned that EOTT was digging up buried documents in New Mexico along the pipeline right-of-way. The Houston company believes those documents may hold more evidence of wrongdoing by Shell.

EOTT sued Shell as the owner of Texas-New Mexico Pipeline Co., claiming the major oil company sold EOTT a portion of its pipeline that it knew was leaking oil into the area water supply.

The jury ruled EOTT should recover spill cleanup costs as well as recover settlement costs with homeowners and legal fees, which will probably total about \$11 million, said Tom Matthews, EOTT chief executive. The jury also awarded EOTT punitive damages of \$50 million.

"The people of Midland sent a message to Texas-New Mexico/Shell that this was not the

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way to run a pipeline, not the way to handle leaks and spills and not the way to sell a pipeline to someone else," Matthews said.

The spill and subsequent finger-pointing by Shell and EOTT came to light when landowners sued EOTT over the spills.

EOTT settled with the owners for about \$3 million, according to EOTT's lawsuit. Then EOTT sued Shell to recover those costs. That case accused Texas-New Mexico Pipeline Co. of poor maintenance, not adequately repairing leaks and selling a damaged system without disclosing it.

Shell issued a prepared statement after the verdict, saying, "We are disappointed with the jury's decision, and we anticipate filing an appeal as soon as we have an opportunity to review the case."

The state district court jury found Texas-New Mexico Pipeline Co. was grossly negligent and committed willful misconduct as well as fraud.

The jury found Texas-New Mexico Pipeline was negligent and committed misconduct in the way they handled the spill and the way they reported to the Railroad Commission of Texas.

They ruled Texas-New Mexico Pipeline was guilty of fraud for withholding information from EOTT when selling EOTT the portion of the pipeline it bought in 1999.

The verdict Wednesday involved only a spill from a subdivision called Kniffen Estates. The documents EOTT has dug up may lead to other cases at other sites, Matthews said.

The documents unearthed in New Mexico related to the pipeline's operations, such as maintenance and repair records, environmental records, payroll information and accounting work.

Many of the documents are so fragile they are being stored in a refrigerated facility.

"This case didn't involve the holes in the desert. Those cases are yet to come," Matthews said. "We have similar other issues in other counties in West Texas and New Mexico that involve the buried documents. They may describe the reason for environmental issues in spills that were not disclosed to us."

A second site, near Odessa, believed to contain more buried documents has been discovered along the pipeline, but EOTT has not been able to dig there yet because the landowner has not given permission.

A Shell spokesman said previously that the company believes the second site contains old and unneeded "office refuse," similar to what Shell claims was likely found at the first site.

[Return to top](#)

**Olson, William**

---

**From:** William\_VonDrehle@Eott.Com  
**Sent:** Thursday, June 05, 2003 5:01 PM  
**To:** RBayliss@state.nm.us  
**Cc:** Johnson, Larry; Olson, William  
**Subject:** Re: Saunders Site Restoration

Randy,

Thanks. I am finalizing arrangements for the clean soils and clay as will be required for completing closure. I will keep you all advised.]

Bill

**Olson, William**

1R126

---

**From:** Chance Johnson [cjohnson@etgi.cc]  
**Sent:** Tuesday, June 24, 2003 11:50 AM  
**To:** Larry Johnson  
**Cc:** Jerry Nickell; Leon Anderson; Martin, Ed; William Olson; William\_VonDrehle@Eott.Com  
**Subject:** Saunders Pit

Mr. Johnson,

ETGI will be installing an impermeable barrier of clay over the excavated area at the Saunders Site on Monday June 30, 2003. The clay will be placed into the excavation at approximately sixteen to eighteen inch lifts and compacted to no less than two feet thick upon completion. Installation activities will be conducted according to guidelines set forth in the response letter from Mr. William C. Olson to Mr. William Von Drehle, dated May 22, 2003. If you have any questions or comments please contact me at (505) 397-4882 or (915) 238-4055.

Thank You,

Chance I. Johnson  
New Mexico Regional Manager  
Environmental Technology Group, Inc.  
(505) 397-4882

6/24/2003

**Olson, William**

---

**From:** Johnson, Larry  
**Sent:** Friday, July 11, 2003 2:50 PM  
**To:** Olson, William



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DCP\_0594.JPG



DCP\_0595.JPG



DCP\_0604.JPG



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DCP\_0647.JPG



DCP\_0648.JPG













07/09/2003



07/11/2003



07/11/2003

**Olson, William**

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**From:** Johnson, Larry  
**Sent:** Thursday, July 03, 2003 4:07 PM  
**To:** Olson, William  
**Subject:** Saunders Pix 2



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DCP\_0592.JPG



DCP\_0418.JPG



DCP\_0453.JPG



DCP\_0551.JPG



DCP\_0571.JPG

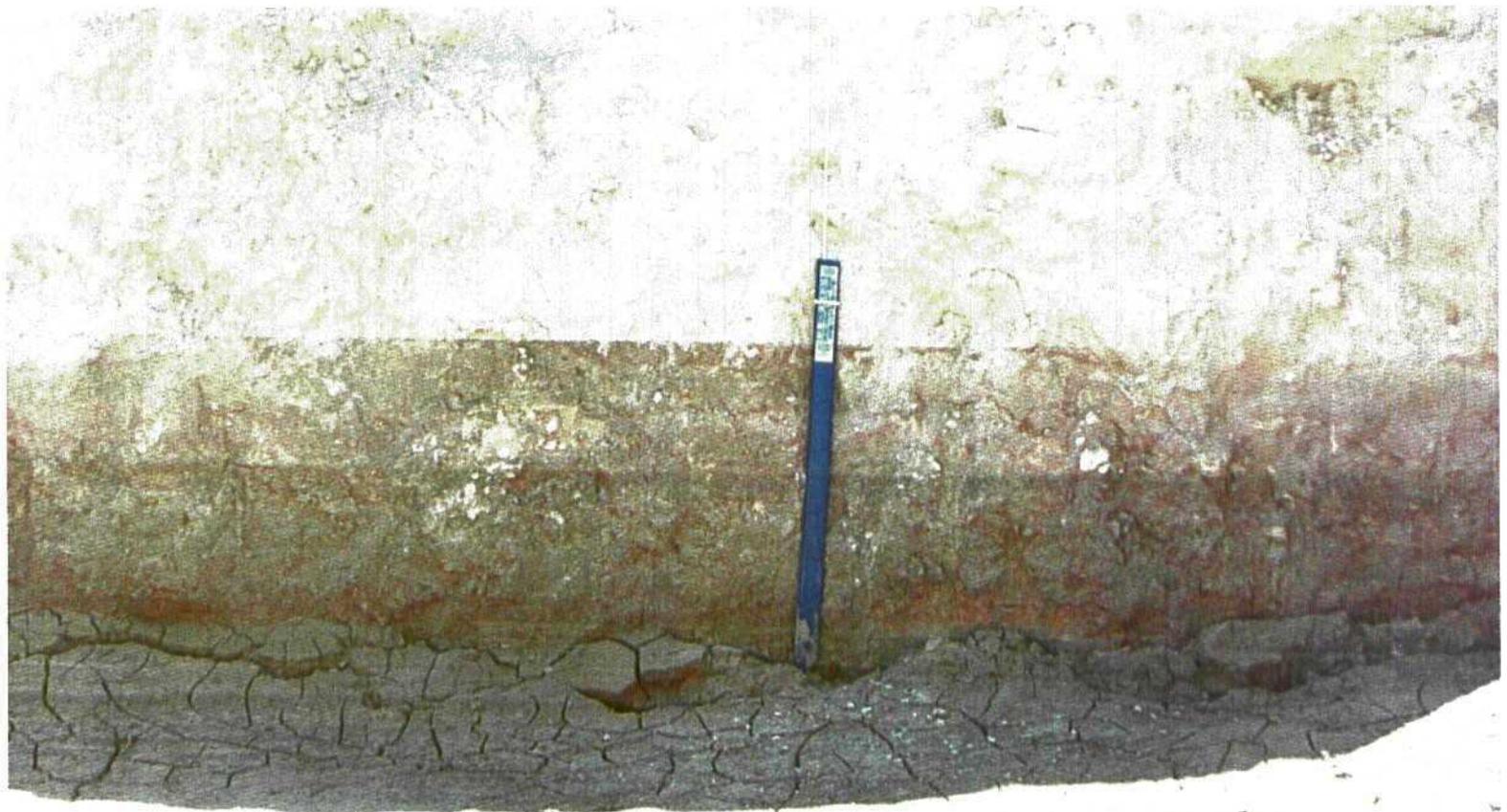


DCP\_0575.JPG



06/23/2003





06/23/2003



06/24/2003



06/27/2003





**Olson, William**

---

**From:** Johnson, Larry  
**Sent:** Thursday, July 03, 2003 4:05 PM  
**To:** Olson, William  
**Subject:** Saunders Pix 1



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DCP\_0224.JPG



DCP\_0226.JPG



DCP\_0330.JPG



DCP\_0331.JPG



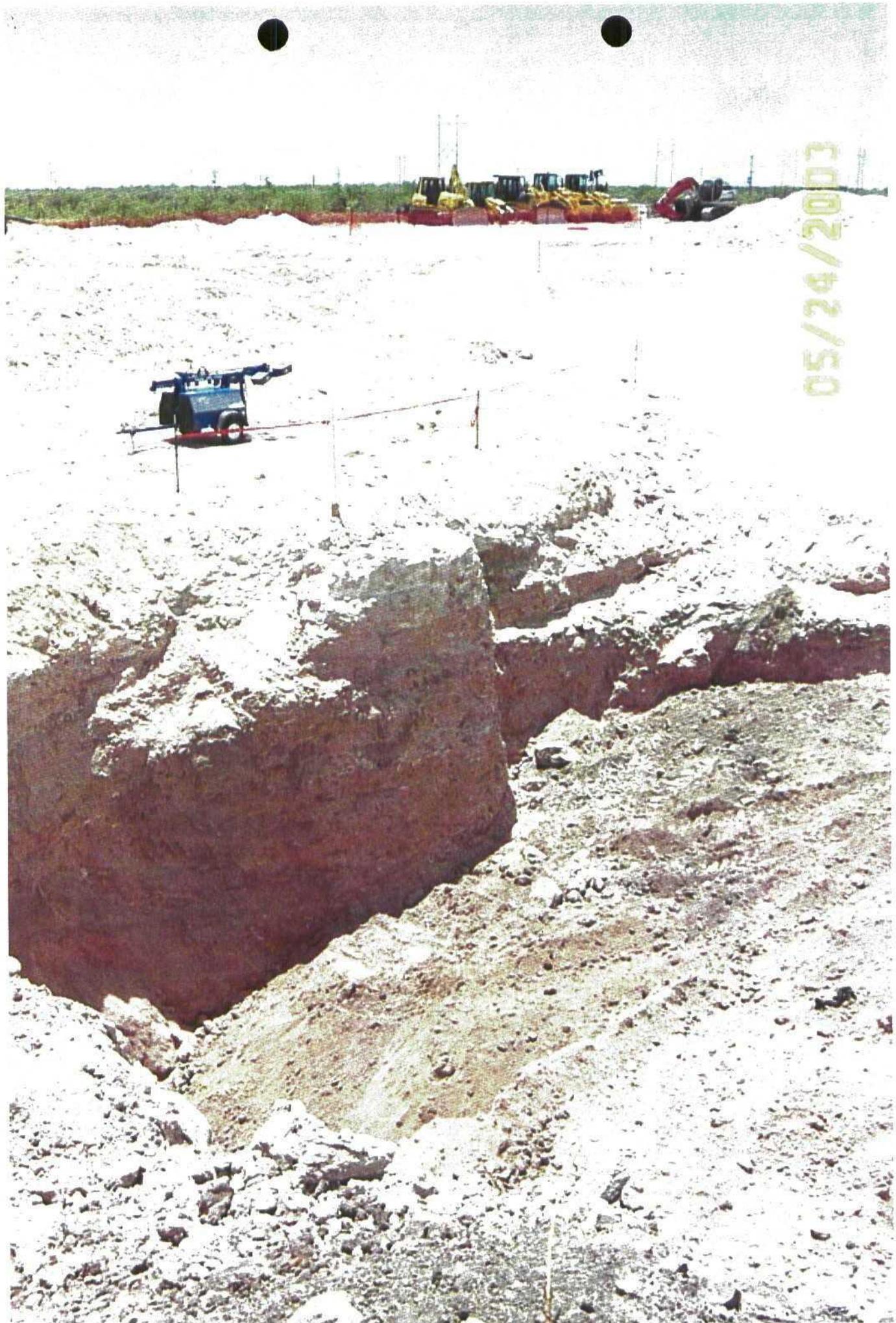
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05/28/2003

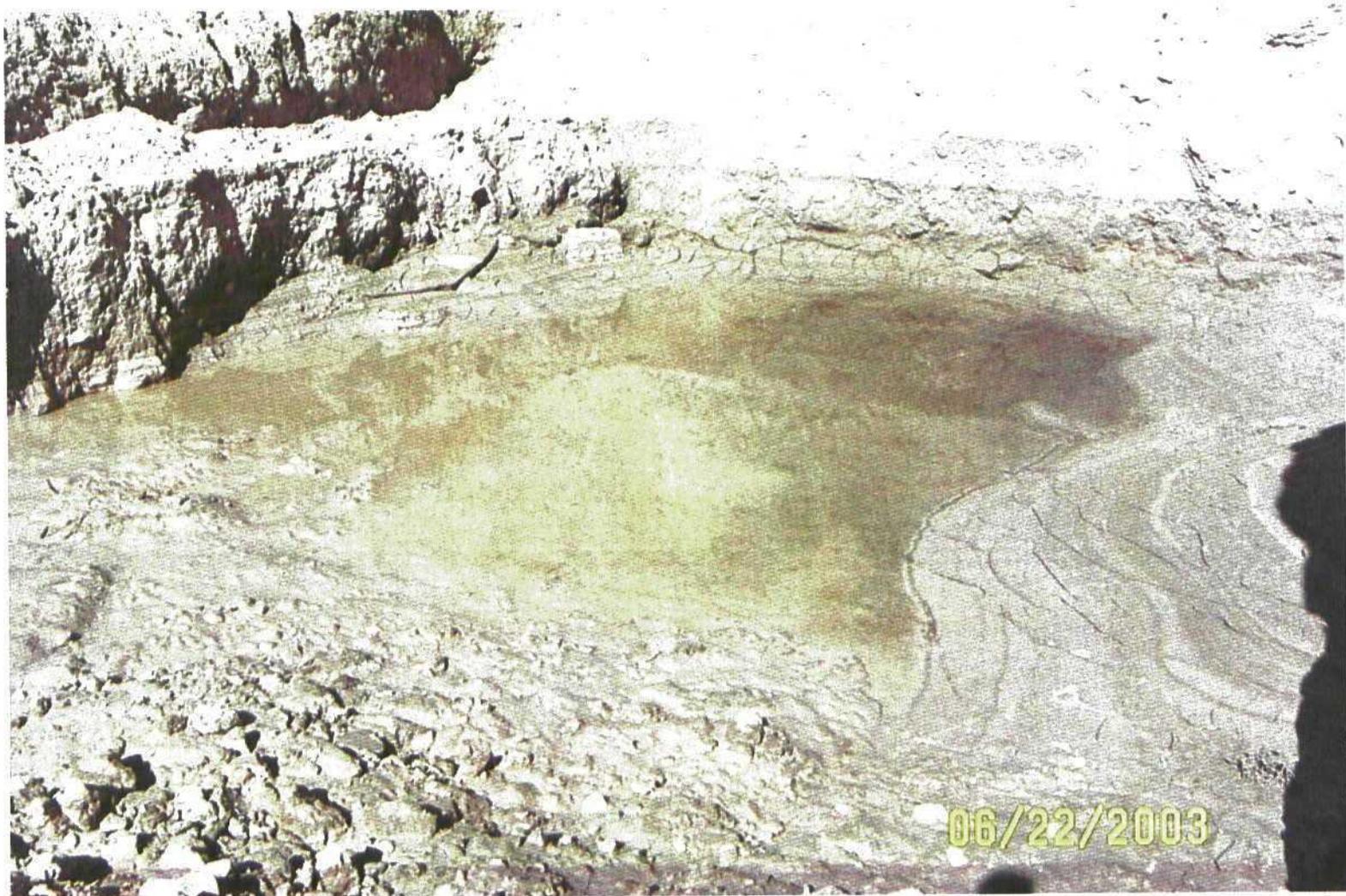


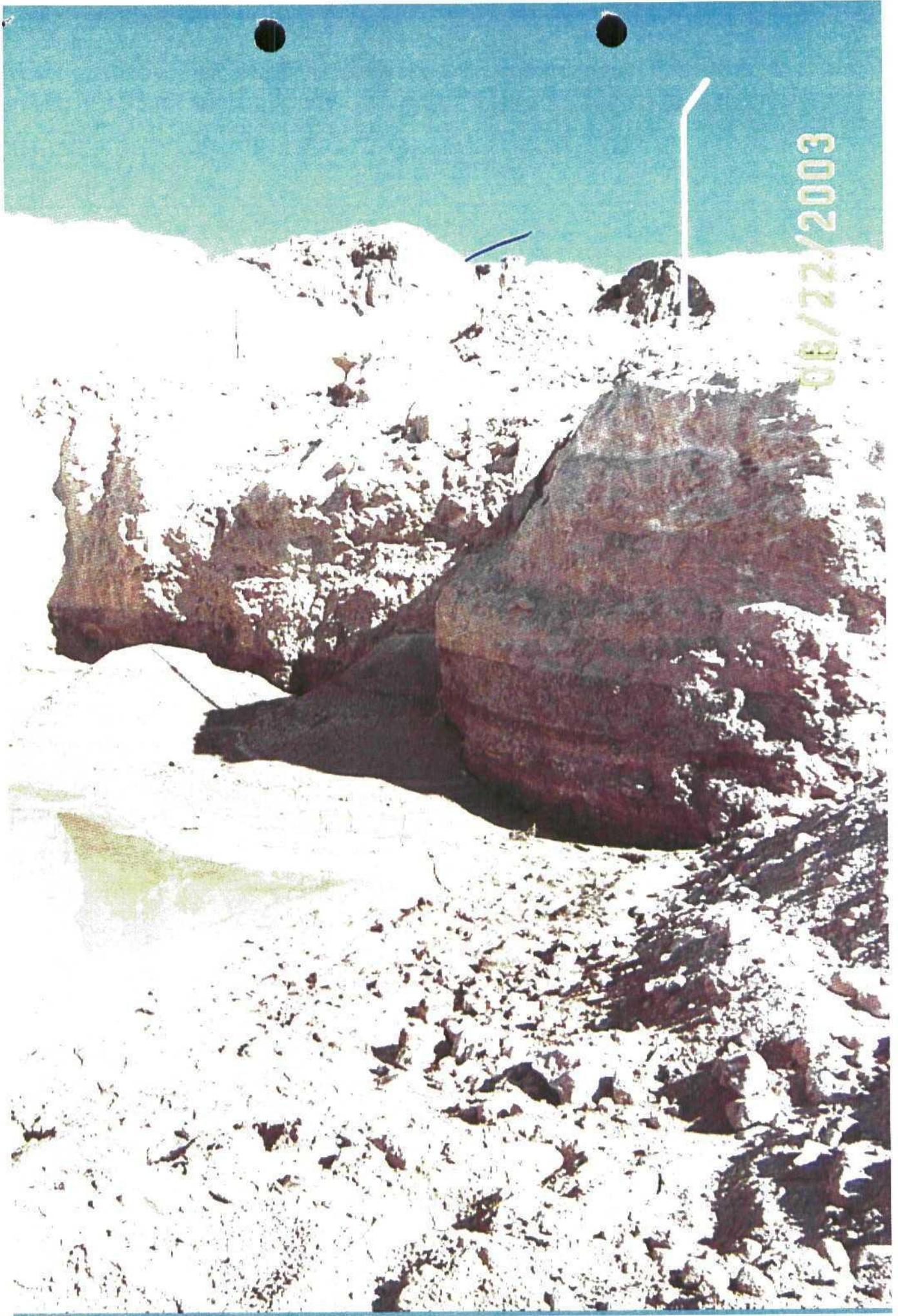






06/22/2003





08/22/2003

**Olson, William**

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Mr. Bayliss,

Mr. Larry Johnson asked me to e-mail you a copy of the analytical results from the stockpile samples taken on Monday at the Saunders Site (see attached). If you have any questions or need any more information please let me know.

Thank You,

Chance I. Johnson  
New Mexico Regional Manager  
Environmental Technology Group, Inc.  
(505) 397-4882

6/11/2003

SOIL CHEMISTRY

EOTT ENERGY, LLC

TODD ROAD LITIGATION  
LEA COUNTY, NEW MEXICO

ETGI PROJECT # EO 1241

SAMPLE LOCATION	SAMPLE DATE	Method: 8015M		
		GRO (mg/Kg)	DRO (mg/Kg)	TOTAL
SS-1	06/02/03	<10	548	548
SS-2	06/02/03	<10	384	384
SS-3	06/02/03	<10	1220	1220
SS-4	06/02/03	<10	700	700
SS-5	06/02/03	13.2	1850	1863
SS-6	06/02/03	12.4	1390	1402
SS-7	06/02/03	<10	202	202
SS-8	06/02/03	13.8	1280	1294
SS-9	06/02/03	<10	722	722
SS-10	06/02/03	14.7	1280	1295
SS-11	06/02/03	17.9	1760	1778
SS-12	06/02/03	17.5	1730	1748
SS-13	06/02/03	19.5	1900	1920
SS-14	06/02/03	18.7	1490	1509
SS-15	06/02/03	14.1	1450	1464
SS-16	06/02/03	18.7	918	937
SS-17	06/02/03	22.6	1950	1973
SS-18	06/02/03	11.3	533	544
SS-19	06/02/03	16.2	510	526
SS-20	06/02/03	19.5	2200	2220
SS-21	06/02/03	<10	234	234
SS-22	06/02/03	15.7	1430	1446
SS-23	06/02/03	<10	338	338

**Olson, William**

---

**From:** Chance Johnson [cjohnson@etgi.cc]  
**Sent:** Thursday, May 29, 2003 1:13 PM  
**To:** Larry Johnson  
**Cc:** William Olson; William\_VonDrehle@Eott.Com; Jerry Nickell  
**Subject:** TNM 95/10 Saunders Site - Stockpile Sampling

May 29, 2003

Larry Johnson  
New Mexico Oil Conservation Division  
1625 N. French Drive  
Hobbs, NM 88240

RE: TNM 95/10 Saunders Site  
OCD File #1R-126  
Monument, New Mexico

Mr. Johnson,

As per our conversation on May 29, 2003 at the NMOCD District office in Hobbs, New Mexico, Environmental Technology Group, Inc. will collect soil samples of the excavated soil stockpiles at the Saunders site on May 30 and June 2, 2003. A composite soil sample comprised of six grab samples will be collected for each 3000 cy of soil to be utilized as backfill and delivered to Environmental Lab of Texas in Odessa, Texas under proper chain of custody. The soil sample will be analyzed for concentrations of Total Petroleum Hydrocarbons (TPH) utilizing EPA method SW846-8015M GRO/DRO. The analytical results will be utilized to confirm the TPH concentration of all backfill material is below 2000 ppm as directed by the response letter from Mr. William Olson (NMOCD) to Mr. William VonDrehle (EOTT) dated May 22, 2003.

If you have any questions, comments or require any further information, please contact me at (505) 397-4882 or Jerry Nickell at (915) 522-1139.

Sincerely,

Chance Johnson  
Regional Manager  
Environmental Technology Group, Inc.  
Hobbs, NM

cc: William C. Olson, NMOCD Santa Fe Office  
William Von Drehle, EOTT Energy LLC  
Jerry Nickell, ETGI Midland Office

**Olson, William**

---

**From:** OLSONMORRIS@aol.com  
**Sent:** Saturday, May 24, 2003 12:54 PM  
**To:** rcanderson@state.nm.us  
**Cc:** wolson@state.nm.us  
**Subject:** EOTT Saunders Re-excavation

Roger,

Here is Saturdays Hobbs News-Sun article on Saunders.

Bill Olson

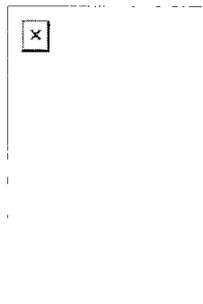
## May 24, 2003 Hobbs News-Sun

### Records motherload

### EOTT dig southwest of of Hobbs yields 190 sacks of documents

RICHARD TROUT

NEWS-SUN



While energy companies have come across an unexpected find in the oilfields from time to time, no one could dreamed of the scope of the untold treasure as the last of 190 moldy burlap sacks containing hundreds of thousands of documents was removed late Friday afternoon from the huge cache secretly buried southwest of Hobbs.

After digging for nearly 30 straight hours, about 20 contract workers and an excavator operator recovered the last of what had first been rumored to be only 40-50 boxes of documents from the bottom of a 45-foot hole, 2-1/2 miles south of the Linam Gas Plant.

Just before 5 p.m. Friday, the last few records had been fished out of the nearly 2-acre recovery site and placed

6/4/2003

in standard-size banker's boxes, which were then placed in a van and moved to a secure storage area in Hobbs. The decaying, dirt-encrusted documents had the sour stench of mold and mildew, caused by moisture contact and being stored for years underground.

The security guard noted she had still not become accustomed to the smell after being in the building for hours.

But most of the documents were in bad shape after the digging ended Friday. And state officials and EOTT employees, including at least one attorney, planned to pore over the material through the Memorial Day Weekend, preparing an inventory of just what survived.

And while there were no questions about the documents' aroma, there are still many questions about why they were buried in the first place. And unless the project manager of this document burial comes forward, it appears those questions won't be answered anytime soon.

But with the words Tex-New Mexico Pipeline Co. or Texaco printed on the top of almost every receipt, manual, letterhead and financial form in the boxes in the cluttered storage space, at least one thing was clear -- some people with one or both of these companies know why the burial took place.

Houston-based EOTT Energy L.L.C., a former Enron subsidiary, started the excavation on May 8. According to EOTT representatives, the recovery took place because the company does not have adequate information about the pipeline it bought from Tex-New Mexico Pipeline in addition to other Tex-New Mexico properties.

"We had a reliable witness who had seen the documents buried back when (the site) was owned by Tex-Mex," said EOTT spokesperson Gretchen Weis. "We're hoping to find environmental records that may have something to do with the pipeline."

Tex-New Mexico owned a pipeline near the Hobbs excavation site until 1999, when it sold the pipeline to EOTT. But the energy company's witness reportedly saw Tex-New Mexico workers bury the documents around about two years ago on the site before EOTT purchased the pipeline.

"We need those documents by law," Weis said Friday afternoon at the excavation.

Because EOTT did not notify the State Land Office that it would be digging on the remediation site, on May 14 it received a cease-and-desist order from the land office.

*Both the State Land Office and the state Oil Conservation Division said EOTT had been negligent in not notifying them of the massive project, which involved seven heavy construction vehicles and lighting for night work.*

"Our main concern is the land out there," said Patrick Lyons, commissioner of Public Lands with the State Land Office, after leaving the excavation site and viewing the documents in Hobbs.

The State Land Office said it should have been notified before the 2-acre excavation started because it was because it was located on State Trust Land. The OCD said it should have been notified because the excavation had disturbed a 1995-2001 remediation project by EOTT and Texaco.

After getting hit with a fine and wrangling over the terms of a right-of-entry permit, EOTT finally resumed digging early Thursday afternoon and found the first bag of documents at 4:57 p.m.

Workers spent the next two hours stabilizing and smoothing the ground around the nearly 50-foot-deep pit, to allow workers on foot easier access to the site, before several returned with shovels to finish off the work by hand. But this proved to be a hard task and workers dug for hours before reaching the second bag of documents late Thursday night.

EOTT is currently involved in litigation with Tex-New Mexico Pipeline over a \$7 million remediation project northeast of Midland, though Weis said the documents near Hobbs may have no relation to this lawsuit.

"We don't even know if they're related to litigation," Weis continued, "but it does look like we have documentation related to the operations of the pipeline."

Because the documents might relate to the lawsuit, Shell spokesman Tim O'Leary said he could not discuss the excavation or the litigation.

Landowners sued Texas-New Mexico and EOTT in March 2001 after discovering well water contamination in the early 1990s by a pipeline spill. The pipeline was owned at the time by Texas-New Mexico.

EOTT filed a counterclaim against Texas-New Mexico arguing it was not responsible at that time because it did not buy the pipeline until 1999. The counterclaim contends the sales agreement says Texas-New Mexico agreed to hold EOTT harmless for liability prior to March 1, 1999.

The counterclaim also states that when EOTT bought the pipeline, the company was supposed to get all environmental documents pertaining to the pipeline's operation and maintenance. And this is what reportedly prompted EOTT's recovery efforts after they eyewitness report.

EOTT is talking with a document restoration specialist regarding the best method of storing the records, Weis said. Based on his suggestions, they will probably use refrigerated trucks to transfer the material to a freezer. Freezing moisture-tainted documents prior to restoration is the best way to avoid further destroying them, Weis said, adding that she doesn't yet know where the documents will be restored.

As he surveyed a rows and rows of boxes waiting to be hefted into a van, Mike Kelly, in-house attorney for EOTT, had a similar assessment.

"There's virtually every type of document associated with the pipeline," Weis said. "These documents should have been returned to us when the (1999 pipeline) purchase closed."

On close inspection, some of these documents appeared relatively innocent -- receipts, run tickets, training manuals, a payroll time report and a benefit plan booklet. Others seemed to have some importance: an auditing report, a guide to "Operating the Pipe Line Pump Station," several manuals from a 1996 Texaco environmental remediation management workshop held in Galveston, Texas -- and a site plan of the Hobbs Texas-New Mexico Pipeline Co reclamation project.

Some of the material included dozens of computer floppy disks in wet pastic bags. One box contained an overlapping supply of red-and-white warning tape for Tex-New Mexico Pipeline.

Many of the documents had the Texaco moniker emblazoned beneath the dirt that covered nearly every piece recovered at the site, but most had clearly been the property of Tex-New Mexico Pipeline.

While EOTT was never really sure documents would be found, only a few days earlier EOTT attorney Daniel Dolan was fairly accurate about what types of documents might be uncovered.

"Those would be the operational documents," he said Monday. "Pipeline operations consist of three things -- construction documents, environmental documents and operational documents, as in how much you pump through it, what it's constructed of and that kind of stuff."

News-Sun writer R.P. Engle and the Associated Press contributed to this report.

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**Olson, William**

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**From:** OLSONMORRIS@aol.com  
**Sent:** Sunday, May 25, 2003 9:22 AM  
**To:** rcanderson@state.nm.us  
**Cc:** wolson@state.nm.us  
**Subject:** (no subject)

Roger,

Attached is an article from the Sunday Hobbs News-Sun. We should have someone look at the documents to see if there are any documents relative to OCD cases.

Bill

## **Hobbs News-Sun May 25, 2003**

### **Documents waiting to be sorted**

MICHELLE A. FOX

NEWS-SUN

EOTT employees moved desks, tables, chairs and computers into an office building commandeered for the daunting task of cataloging the thousands documents dug up last week from a closed remediation site southwest of Hobbs.

"We have been asked by the State Land (Office) to do a generalized review of what might be in each box," said Gretchen Weis, EOTT spokeswoman, on Saturday from the Hobbs office.

Meanwhile, EOTT is claiming the documents were buried in 190 burlap sacks in a 45-foot hole just weeks before it bought the pipeline assets and the remediation site from Texas-New Mexico Pipeline.

In addition to the office supplies, EOTT also has to bring in a document restorer to help decipher the moldy, decaying papers and decide what to do with them, meaning the sorting of documents is not expected to begin in earnest until today at the earliest.

"They (the document restorer) has to get here and look at everything," Weis said.

A representative from the State Land Office has also requested to be present for the reviewing process. The documents were buried on state land and the State Land Office has fined EOTT for not notifying the state it was digging up the documents and disturbing a remediation site.

Until this step of reviewing the documents is completed, there is no clear direction of what will come next in EOTT's search for information to help the company defend itself in a lawsuit that was filed against EOTT and Texas-New Mexico Pipeline Co. (TNPC).

The suit was filed in March 2001 after wells in Midland County were found to be contaminated from a pipeline spill

6/4/2003

that occurred in the early 1990s.

EOTT has always contended it is not responsible for the contamination because it had not yet purchased the portion of TNPC's pipeline assets at the time of the spill. In fact, it would not be until 1999 that the purchase would take place -- a purchase that, according to EOTT officials, occurred only a few weeks after the documents were buried.

"These documents may be important to us for several different reasons," Weis said. "The state may want copies, other companies may want copies, but we will not know until we know what we got."

Other oil companies, such as Royal Dutch/Shell, also hope to find documents to aid them in similar cases. TNPC is a subsidiary of Shell and portions of it were purchased by EOTT, which was at one time a subsidiary of Enron.

And along with the documents that had been buried south of Hobbs, EOTT officials believe there are other documents buried in other undisclosed locations although EOTT spokeswoman Weis could not provide more details of where.

The dig near Hobbs was started on May 15 after a confidential informant told EOTT that the documents it was searching for had been buried in the spring of 1999.

According to this informant he was "personally present when some records were thrown in a hole."

Weis said the eyewitness account states the documents were buried in early to mid-April of 1999. EOTT took formal possession of certain TNPC pipeline assets May 1 of that same year.

"These are definitely the documents that were supposed to be turned over to EOTT by Tex-New Mex when the transaction took place," EOTT attorney Dan Dolan said from Albuquerque.

A common misconception is that EOTT bought out all of Texas-New Mexico Pipeline and that is not the case.

"It is important for people to know that Tex-New Mex still exists as a separate company," Weis said. "We purchased the parts of its pipeline assets that complimented our system."

The buried documents were found in the site south of Hobbs where TNPC and ChevronTexaco had, in 1998, started removing and replacing the soil that had been contaminated by the pipeline spill.

Until the remediation was completed in 2001, the site remained an open 50-foot deep pit. -- providing an easy dumping ground for the 190 sacks of papers.

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By Associated Press Staff

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Tuesday, May 27, 2003

## EOTT Documents Recovered From Hole Must Be Restored

Associated Press

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Workers hired by EOTT Energy work in a pit Friday, May 23, 2003, to unearth burlap bags containing plastic-wrapped documents that a Houston-based oil shipping company had been searching for on state trust land. EOTT Energy LLC ordered the search for documents believed to have been buried in the area by another company. (AP Photo/News-Sun, Cody Gideon)

Thousands of documents recovered by an energy company from a 45-foot-deep hole in southeastern New Mexico were sent Tuesday to a Texas firm that will try to restore them.

The documents - enough to fill 190 boxes - were exhumed last week by EOTT Energy LLC, a company that bought pipelines from Texas-New Mexico Pipeline Co., a subsidiary of Shell Oil.

The paper documents and more than 100 computer disks could potentially help EOTT defend itself in a 2-year-old lawsuit filed by residents in Midland County, Texas.

EOTT spokeswoman Gretchen Weis said Tuesday the documents, which had been buried in burlap sacks, were covered with mold and mildew.

Because of their deteriorated condition, they were sent to Blackmon Mooring, a document restoring company in

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Fort Worth, Weis said.

"They will be freeze-dried ... then stabilized enough to be read or reviewed," Weis said.

Weis said a preliminary examination of the documents revealed they included information about pipeline operations, maintenance records and environmental records. But there was much more, she said.

"We were surprised to find financial, accounting and personnel records" of employees of Texas-New Mexico Pipeline, Weis said.

The documents included pipeline maps and correspondence with Texas-New Mexico Pipeline letterhead.

Dan Dolan, an Albuquerque attorney representing EOTT, has said that company was tipped off about the buried records by a confidential informant who once worked for Texas-New Mexico Pipeline Co.

"He knew EOTT was looking for the missing documents," Dolan said last week. "He remarked to somebody in the company (EOTT), 'I was personally present when some records were thrown in a hole.'"

Weis said the informant claimed the documents were buried in the spring 1999 prior to EOTT taking ownership of the pipelines.

Because the documents might relate to the lawsuit, Shell spokesman Tim O'Leary said last week he could not discuss the excavation or the litigation.

The landowners sued Texas-New Mexico Pipeline and EOTT in March 2001 after discovering well water was contaminated in the early 1990s by a pipeline spill. The pipeline was owned at the time by Texas-New Mexico Pipeline.

EOTT filed a counterclaim against Texas-New Mexico Pipeline, arguing that it was not responsible because it did not purchase the pipeline until 1999. The counterclaim contends the sales agreement says Texas-New Mexico agreed to hold EOTT harmless for liabilities from death, injury, toxic exposure and property damage resulting from the operation and maintenance of the pipeline before March 1, 1999.

The counterclaim also states that when EOTT bought the pipeline, the company was supposed to get all environmental documents pertaining to the pipeline's operation and maintenance.

Walt Zimmerman, EOTT's chief counsel, said those documents were missing.

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## Shell: More pipeline documents may be buried in West Texas

R.P. ENGLE

NEWS-SUN

Within hours of locating hundreds of thousands of moldy documents buried in a 45-foot-deep pit southwest of Hobbs last week, EOTT Energy officials were informed of another similar unauthorized office papers dump site in West Texas.

"Only since last week did we become aware of the site (near Hobbs), and now we've found out about a site in West Texas," Tim O'Leary, media relations representative for Shell Oil Co., said Thursday. "And we told EOTT about the site (May 23)."

According to O'Leary, Shell had only recently learned of the site near the Barnsley Pumping Station, 30 to 35 miles south of Odessa, and along a right of way for a pipeline that used to be owned by Texas-New Mexico Pipeline Co., after researching old Tex-Mex documents in Shell's possession upon hearing about the unauthorized Hobbs dig.

"When we found out about this, we were dumbfounded," said O'Leary. "I said, 'we have to tell the world.'"

The documents exhumed last week 21½ miles south of the Linam Gas Plant near Hobbs appear to be operational documents including pipeline run tickets, repairs and remediation, and the site near Odessa may contain similar materials.

"The site is believed to contain material apparently comprised of either duplicates of old un-needed documents or original documents kept past their useful life," O'Leary said.

Shell is conducting its own investigation to determine who buried the documents near Hobbs and Odessa and whether they contain anything other than office refuse.

"Needless to say, Shell does not condone this form of document destruction," he said.

Shell Oil's interest in "buried" documents came about because the venture they co-own with Texaco, Equilon LLC, which purchased

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Tex-Mex's remaining pipeline interests in Aug. 1999 -- three months after EOTT's initial pipeline purchase.

Previous to 1998, Tex-Mex was owned by Texaco, Citgo and Atlantic Richland oil companies.

The documents found southwest of Hobbs could potentially help EOTT defend itself in a lawsuit filed in March 2001 by a group of landowners in Midland. That group sued EOTT, Tex-Mex and Equilon after discovering in Oct. 2000 that their well water was contaminated by crude oil in the early 1990s when the pipeline was owned by Tex-Mex. Equilon didn't own any portion of the pipeline in question and were later dropped from the suit.

EOTT filed a counterclaim against Tex-Mex alleging EOTT was not responsible for the pipeline, or damages caused by it, prior to their purchase in 1999. The counterclaim also says EOTT was supposed to receive all environmental documents pertaining to the pipeline's operation and maintenance when EOTT bought the pipeline.

Currently, the documents unearthed near Hobbs are going through a two to three week freeze-drying process by a document restoration firm in Fort Worth to remove all moisture from the documents, thereby stopping further decay from being stored for years underground.

And for the second time in as many document recovery efforts, EOTT has produced evidence of burial site via an "unidentified eye witness" that may have at one time worked for Tex-Mex.

EOTT spokesperson Gretchen Weis said her company has learned from sources "that some of these documents buried near Midland actually originally had been stored in a storage place in Texas and that they had to drive them a long way to bury them."

EOTT has yet to obtain the rights to dig at the West Texas site because "there's an independent land owner that's involved that Shell has to work with to get permission," Weis said.

But Shell officials said Thursday afternoon that their interest in the documents ended with contacting EOTT as to their whereabouts.

"We had preliminary conversations with the land owner, who we think is Plains Petroleum, but we've notified EOTT that it's up to them to locate the documents if they want them," said O'Leary.

EOTT's contention since the State Land Office shut down their effort near Hobbs on May 14, was that they were attempting to recover documents they suspected Tex-Mex workers had buried. And that the documents were related to the nearby pipeline that EOTT bought from Tex-Mex in 1999.

"Those would be the operational documents," Dan Dolan, an Albuquerque attorney representing EOTT, said on May 14. "Pipeline operations consist of three things - construction documents, environmental documents and operational documents, as in how much you pump through it, what it's constructed of and that kind of stuff."

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And apparently the energy company feels the same way about the new site south of Odessa.

"We believe these are, in fact, documents that should have been delivered to us at the time of the sale of part of Texas-New Mexico Pipeline," Weis said. "I would caution that until we are able to locate the documents, we don't know what we've got. We believe basically that they are related to pipeline operations and environmental facts."

And at least one Shell Oil official wonders why EOTT has made the sudden discovery that there were missing documents from their purchase of portions of Tex-Mex in May of 1999 -- or why they would make it appear that the suddenly sensitive documents may protect them from legal action.

"Extensive documentation, including extensive environmental documentation, was provided prior to the sale," O'Leary said Thursday. "So for someone to imply otherwise is absurd."

"(EOTT) knew the condition of that pipeline. And while I don't know how much, of a significant amount was knocked off the price," he said.

Houston-based EOTT Energy took its current moniker from its days as a subsidiary of the financial giant, Enron Oil Trading and Transportation. Amid massive accounting fraud, the company filed for bankruptcy in late 2001. What remains of Enron is still trying to emerge from Chapter 11 reorganization.

"Needless to say, Shell doesn't condone this type of document destruction," O'Leary said. "It indicates to us that someone is hiding something -- but what, we don't know."

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**Olson, William**

---

**From:** Olson, William  
**Sent:** Friday, May 23, 2003 9:16 AM  
**To:** Wrotenbery, Lori  
**Cc:** Anderson, Roger; Brooks, David K  
**Subject:** EOTT Saunders Re-excavation Update

Lori,

The SLO has granted EOTT access to the site to finish digging for documents. The SLO is assessing EOTT a trespass fee and required a bond as a condition of entry. Attached is a May 22, 2003 Hobbs News-Sun news article on the SLO/EOTT agreement.

On May 20, 2003, OCD received a site restoration work plan from EOTT. The work plan was conditionally approved by the OCD on May 22, 2003.

Also, I heard on KKOB radio this morning that some boxes of documents were found when digging resumed. I contacted the Hobbs District Office and they are going to inspect the site this morning.

If you have any questions please contact me.

Sincerely,



William C. Olson  
Hydrologist  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
(505) 476-3491



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## Land Office, EOTT reach agreement

RICHARD TROUT

NEWS-SUN

The State Land Office and EOTT Energy L.L.C. have reached agreement that will allow EOTT to continue digging a large pit about nine miles southwest of Hobbs.

"They've been hashing it out all week," said land office communications director Kristin Haas.

EOTT has agreed to sign a right-of-entry permit agreement, which includes a \$500,000 letter of credit that guarantees the reclamation effort if it is not done to the land office's satisfaction, Haas said.

For digging on State Trust Land without notifying the land office, EOTT will be charged \$500 a day that's retroactive to May 15 and will last until the project is completed, and a \$1,000 trespass fine.

Haas said the digging could resume today as long as the permit agreement is signed by then.

Houston-based EOTT, which is digging for buried documents, received a cease-and-desist order from the land office just over a week ago. Both the land office and the state Oil Conservation Division said EOTT had been negligent in not notifying them of the massive dig, which they said involved seven construction vehicles, lighting for night work and about eight contracted workers.

The State Land Office had been notified of the 2-acre-wide, 45-foot-deep excavation area on May 14, nearly a week after it began.

As to why EOTT is looking for possibly buried documents, attorney Daniel Dolan said on Tuesday EOTT believes Tex-New Mexico Pipeline Co. may have buried -- around 2001 -- some documents that could help EOTT. Those buried records may be related to a

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1995-2001 remediation project conducted by EOTT and Texaco, they may be related to something else, or there may be no records at all, he said.

"I have no reason to presume that the records would have been put there at any other time," Dolan said Tuesday.

EOTT is a former Enron spin-off that gained independence from the financial giant in 1996. But Enron still retained 37 percent ownership of EOTT until October 2002, when EOTT announced it had filed for Chapter 11 bankruptcy protection to shed its remaining connections with Enron.

Enron filed for bankruptcy in late 2001 amid massive accounting fraud.



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BILL RICHARDSON

Governor

Joanna Prukop  
Cabinet Secretary

Lori Wrotenbery

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



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SANTA FE, NM 87505  
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(505)476-3462 (Fax)

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FROM: Bill Olson

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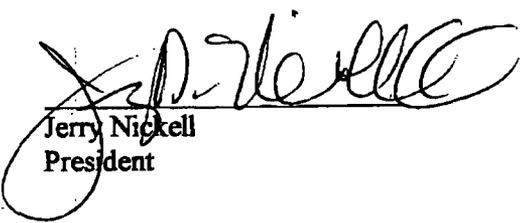
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Litigation Support**

**Document Recovery Work Plan**

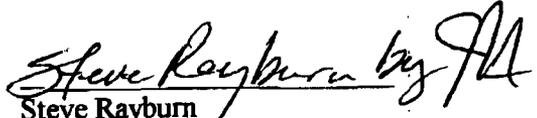
**Environmental Technology Group, Inc.  
Houston, Texas**

**ETGI Project Number EO1241**

**May 8, 2003**



**Jerry Nickell  
President**



**Steve Rayburn  
Senior Project Manager**

**DRAFT**

**TABLE OF CONTENTS**

1.0	INTRODUCTION	3
2.0	BACKGROUND	3
3.0	SCOPE OF WORK	3
4.0	SCHEDULE	4
5.0	CHAIN OF CUSTODY PROCEDURES	4
6.0	DISTRIBUTION	4

**DRAFT**

## **1.0 INTRODUCTION**

On behalf of EOTT Energy, LLC (EOTT), Environmental Technology Group, Inc. (ETGI) has prepared this Document Recovery Work Plan to address the recovery of two separate locations of documents believed to be of relevance in the legal proceedings involving Texas-New Mexico Pipeline. The undisclosed locations are believed to be located in Monument, New Mexico and Crane, Texas. The purpose of this work plan is to summarize the methods used to determine the whereabouts of the buried documents and methods which will be utilized to recover said documents.

## **2.0 BACKGROUND**

It is believed that two separate locations exist which Texas-New Mexico Pipeline documents have been buried prior to the acquisition by EOTT. One location has been verified by a credible witness (Monument, New Mexico). The other general location has been verified through statements but the exact location has yet to be determined.

## **3.0 SCOPE OF WORK**

The buried records will be unearthed using heavy equipment until the records are exposed. Excavation will commence and continue until all documents have been located and recovered. Any pauses in activity due to weather, or changes in working conditions will require the need for site security and document protection/preservation as directed by the on-site Project Manager and/or EOTT.

Once the records are exposed the excavation will be properly sloped and inspected by a competent safety/management professional prior to entry by personnel. ETGI personnel will uncover the records by hand digging in order to improve the chance for recovering all records intact. The records will then be photographed in-place as encountered before being logged and labeled on-site. Any records found boxed will remain boxed and if possible all records found loose will be bagged using zip-lock plastic bags, numbered, and placed into new document boxes. A document inventory for each box of loose documents will be prepared and affixed to the box lid. All boxes of documents will be photographed again prior to manifesting and loading of boxes. No cleaning, separating or extensive review of any documents will be attempted on-site in order to preserve the integrity of all documents. All collected documents will be transported to a site as designated by EOTT. This entire process will be logged in a standard field logbook and photographed as described above.

**DRAFT**

#### **4.0 CHAIN OF CUSTODY PROCEDURES**

A standard chain-of-custody form will be prepared for all boxes of the recovered/collected documents. This chain-of-custody form will accompany the recovered/collected documents during travel/transportation of said documents. Any change in custody by any individual employed by either ETGI or EOTT will be signed and dated by each individual documenting both the relinquishing and the accepting of custody for these document boxes. A copy of the chain-of-custody has been included as Attachment A.

#### **5.0 SCHEDULE**

Work will begin as soon as possible and cease when all documents have been delivered to a site designated by EOTT.

#### **6.0 DISTRIBUTION**

- Copy 1:       Mike Kelly  
              EOTT Energy, LLC  
              2000 W. Sam Houston Parkway S  
              Suite 400  
              Houston, Texas 77042
- Copy 2:       Bill Von Drehle  
              EOTT Energy, LLC  
              2000 W. Sam Houston Parkway S  
              Suite 400  
              Houston, Texas 77042
- Copy 3:       Environmental Technology Group, Inc.  
              4600 W. Wall  
              Midland, Texas 79703



# SITE RESTORATION WORK PLAN

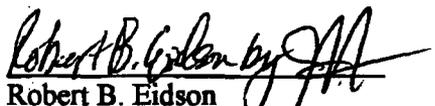
**FORMER C. J. SAUNDERS EXCAVATION SITE**  
**Lea County, New Mexico**  
**NW ¼ of the SE ¼ of Section 18, Township 19 South, Range 36 East**

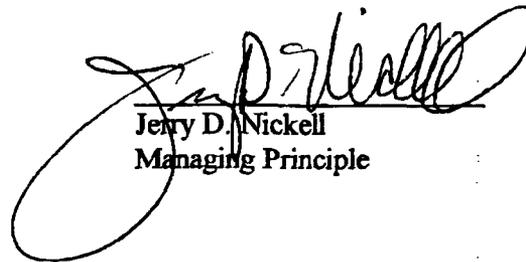
Prepared For:  
**EOTT Energy, LLC**  
5805 East Highway 80  
Midland, Texas 79701

ETGI Project # EO 1241

Prepared By:  
Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, New Mexico 88240

May 2003

  
Robert B. Eidson  
Geologist / Senior Project Manager

  
Jerry D. Nickell  
Managing Principle

5-20-03

  
Wm. R. Verhulst  
Director, Environmental  
EOTT Energy LLC

REC'D 5/20/03  
Bayler

## 1.0 INTRODUCTION AND SITE BACKGROUND

The site is located approximately 7.5 miles southwest of the town of Hobbs, New Mexico in the NW ¼ of the SE ¼ of Section 18, Township 19 South, Range 36 East. For reference, a site location map is provided as Figure 1. The contents of this Work Plan are intended to adhere to requirements promulgated in Rule 19 New Mexico Administrative Code (NMAC).

In February 1995 a crude oil release occurred from a pipeline owned and operated by the Texas-New Mexico Pipeline Company (TNMPL). Response actions included excavation of impacted soil to a depth of approximately six feet below ground surface (bgs). In June 1995, subcontractors conducting additional site excavation actions encountered a closed production pit associated with the C.J. Saunders Federal Tank Battery No. 1. The pit located immediately north of the TNMPL leak site was over excavated to a depth of approximately 55 feet.

Following the completion of soil remediation and ground water monitoring activities the site was closed. Closure was granted following submittal of the Final Closure Report, submitted by Larson and Associates, Inc., dated February 27, 2001. The New Mexico Oil Conservation Division (NMOCD) acknowledged final closure of the site on July 11, 2001. Final Closure Report dated February 27, 2001 included as Appendix A. NMOCD closure approval letter included as Appendix B.

On May 8, 2003, Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy, LLC (EOTT), commenced excavation of the southeastern portion of the former excavation area in an effort to recover documents believed to be buried at the site prior to EOTT's involvement and/or ownership of the TNMLP pipeline system. Document Recovery Work Plan included as Appendix C.

## 2.0 SCOPE OF WORK

Upon completion of excavation activities ETGI will restore the site in compliance with conditions as outlined in the above referenced closure report (Larson and Associates, Inc., February 27, 2001), and as described in the following paragraphs.

Following completion of excavation activities, ETGI will back fill the excavation area with the soil removed during the document recovery activities. The soil will be placed in 2 to 4 foot lifts and machine compacted to approximately 2 feet bgs. Following completion of backfilling and machine compacting a suitable clay cap will be placed over the backfilled excavation, thus replacing the original clay cap placed as a result of the 2001 closure. During placement, the clay cap will be contoured to provide for adequate storm water run off, suitable or indicative of the natural topography and drainage of the area. The clay will be acquired from a location nearest the site, and will be compacted to a uniform thickness of approximately 2 feet thick. The cap will be compacted and tested by American Society Testing Methods (ASTM) D-2922 and D-698 for field density, moisture content and standard proctor density to ensure compliance with compaction to a minimum of a 95 percent proctor density.

Following completion of laboratory testing of clay cap materials, approximately 12 to 18 inches of clean topsoil will be spread on top of the cap, in order to promote re-vegetation of native grasses and/or plants.

### 3.0 CLOSING

Upon completion of above referenced activities, ETGI on behalf of EOTT will submit a final closure report to the NMOCD for review and approval. The final closure report will be submitted to NMOCD within 45 days of cessation of field activities.

### 4.0 REFERENCES

Guidelines for Remediation of Leaks, Spills and Releases; August 1993 (NMOCD, 1993);

Title 19; New Mexico Administrative Code 15.A.19;

Final Closure Report, C.J. Saunders Excavation, Larson & Associates, February 27, 2001;  
and

Ground-Water Report 6. Geology and Ground-Water Conditions in Southern Lea County, New Mexico; Alexander Nicholson, Jr. and Alfred Clebsch Jr.; United States Geological Survey, New Mexico State Bureau of Mines and Mineral Resources, 1961.

**APPENDIX A**

**FINAL CLOSURE REPORT  
C.J. SAUNDERS SITE  
LARSON AND ASSOCIATES, INC.  
FEBRUARY 27, 2001**

# Larson & Associates, Inc.

Environmental Consultants

February 27, 2001

Mr. William C. Olson  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Final Closure Report, C. J. Saunders Excavation, Unit Letter J, Section 18,  
Township 19 South, Range 36 East, Lea County, New Mexico

Dear Mr. Olson:

Please find the enclosed report detailing closure of an excavation at the C. J. Saunders Lease located in Unit Letter J, Section 18, Township 19 South, Range 36 East, Lea County, New Mexico. The report is submitted in accordance with the work plan ("Response to Work Plan for Saunders Excavation Site, Unit Letter "J", Section 18, Township 19 South, Range 37 East, Lea County, New Mexico, April 24, 2000" and "Laboratory Analysis 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, May 8, 2000") approved by the NMOCD on May 10, 2000. Please call Mr. Rodney Bailey at (915) 688-2971 or myself at (915) 687-0901 if you have questions.

Sincerely,

*Larson & Associates, Inc.*



Mark J. Larson, CPG, CGWP  
President

Encl.

cc: Mr. Rodney Bailey - Texaco  
Mr. Robert Patterson - Texaco  
Mr. Wayne Brunette - EOTT  
Mr. Chris Williams - District I

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**Olson, William**

---

**From:** Olson, William  
**Sent:** Wednesday, May 21, 2003 2:24 PM  
**To:** Wrotenbery, Lori  
**Cc:** Anderson, Roger; Brooks, David K  
**Subject:** EOTT - Saunders Excavation Site

Lori,

Attached is a copy of today's news article on the EOTT Saunders site. EOTT's attorney is listed as saying that, at OCD's request, their consultant estimated the cost of remediation at \$50,000. I believe he was actually referring to the SLO and not OCD. I met with Cody Morrow of the SLO at lunch time and he said the SLO was trying to figure out the cost of site reclamation.

EOTT submitted a site restoration work plan to the OCD this morning. I told EOTT that we would respond to them tomorrow. I also gave the SLO a copy of EOTT's work plan.

I also just received a call from Richard Trout with the Hobbs News-Sun. He was checking some facts on the site. He asked about the date that EOTT took over ownership of the site from Texas-New Mexico Pipeline Company and the time frames for prior remediation and closure of the site.

If you have any questions please let me know.

Sincerely,



William C. Olson  
Hydrologist  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
(505) 476-3491



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## Land Office, EOTT negotiating permit for dig

RICHARD TROUT

NEWS-SUN

With the cost of remediation still in contention, the State Land Office and EOTT Energy L.L.C. are negotiating over the terms of a right-of-entry permit that would allow the energy company to resume digging a large pit southwest of Hobbs.

Houston-based EOTT, which is digging for buried documents, received a cease-and-desist order from the land office a week ago. Both the land office and the state Oil Conservation Division said the company had been negligent in not notifying them of the massive dig, which involved seven heavy construction vehicles, lighting for night work and about eight contracted workers.

The State Land Office had been notified of the 2-acre-wide, 45-foot-deep excavation area on May 14, nearly a week after it began.

"We hope we can get it resolved (Tuesday)," said land office communications director Kristin Haas on Tuesday morning.

A right-of-entry permit, she explained, allows individuals to conduct activities on State Trust Land and former remediation sites such as EOTT's excavation roughly six miles southwest of Hobbs.

By late Tuesday afternoon, however, EOTT attorney Daniel Dolan of Dolan & Domenici in Albuquerque said the company was not satisfied with the right-of-entry stipulations.

Its main point of contention is related to the cost of remediation at the excavation site. Once EOTT finishes searching for possibly buried documents, it will have to return the site to its original state.

This includes replacing a clay cap used to prevent the area's soil -- formerly contaminated by a pipeline oil spill -- from potentially reaching groundwater.

At the OCD's request, an EOTT consultant has estimated the remediation cost at \$50,000, Dolan said.

"What we're trying to do is get the State Land Office to recognize that their bond requirement is 15 times that amount of money, which is

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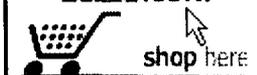
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really excessive," he said.

As to why EOTT is looking for possibly buried documents, Dolan said EOTT believes Tex-New Mexico Pipeline Co. may have buried -- around 2001 -- some documents that could help EOTT in the future. Those buried records may be related to a 2001 remediation project conducted by EOTT and Texaco, they may be related to something else, or there may be no records at all, he said.

"I have no reason to presume that the records would have been put there at any other time," Dolan said.

Tex-New Mexico Pipeline Co. owned a pipeline near the excavation site until 1999, when it sold the pipeline to EOTT.

On Tuesday, Dolan was more specific about what kind of information these potential records contain.

"Those would be the operational documents," he said. "Pipeline operations consist of three things -- construction documents, environmental documents and operational documents, as in how much you pump through it, what it's constructed of and that kind of stuff."

Dolan said he wouldn't expect to see financial documents because these would be stored at a company's headquarters, not out in the field.

"It's one of those three things, or a combination," he said.

EOTT is a former Enron spin-off that gained independence from the financial giant in 1996. But Enron still retained 37 percent ownership of EOTT until October 2002, when EOTT announced it had filed for Chapter 11 bankruptcy protection to shed its remaining connections with the financial giant.

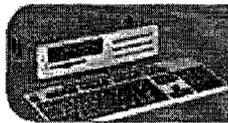
Enron filed for bankruptcy in late 2001 amid massive accounting fraud. The remains of the company trying to emerge from Chapter 11 reorganization continues to be involved in court cases.

Nearly a week ago, the connection left at least one state official wondering if the records workers were digging for had anything to do with Enron's downfall. Although Dolan now says the possibly buried documents are related to operations or environmental issues, State Land Commissioner Patrick Lyons had a different opinion on Thursday of last week.

"They claim to have civil documents down there," Lyons said while surveying the excavation site.

"Whatever was buried down there before was when (EOTT was part of) Enron," he added.

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May 17, 2003, 12:43AM

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**A deep and dark mystery****EOTT seeking paper treasure?**By **TOM FOWLER**

Copyright 2003 Houston Chronicle

IT'S not unusual for energy companies to dig holes in the ground, but Houston-based EOTT Energy has been burrowing in the desert near Hobbs, N.M., in search of something other than oil.

Since last week, the former Enron Corp. subsidiary has been scouring barren land at the former site of an oil spill in search of what may be a stash of missing documents related to the operation of a nearby pipeline EOTT acquired in 1999 from Texas-New Mexico Pipeline Co., said Dan Dolan, an Albuquerque attorney who represents EOTT.

The New Mexico State Land Commission stopped the digging on the public lands on Wednesday, saying the company lacked the proper permission to do the work, but it is expected to continue Monday under the supervision of the Land Office and police.

"There were clear gaps in the records, and subsequently a guy who worked for Texas-New Mexico told EOTT that he witnessed boxes of documents being buried at the site in 2001 by Texas-New Mexico workers," Dolan said. "We don't know if the effort to bury the documents was surreptitious, and we still don't know if they're even there."

At the time of the alleged document burial, EOTT owned the pipeline and was working

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with ChevronTexaco to clean the site after an oil spill. That process included removing truckloads of contaminated soil and bringing in clean fill.

The missing documents could include records of other oil spill remediation efforts, soil contamination reports, groundwater level studies and other documents relating to the day-to-day operation of the pipeline.

Such information is important for companies to maintain in the face of changing laws and lawsuits.

EOTT was using as many as a half-dozen front-end loaders, bulldozers and other machines in the excavation of the two-acre site this week, and had reached a depth of about 40 feet. Dolan said workers believed they were close to reaching the buried documents.

A spokeswoman for the State Land Commission said the company needed to get permission for the work first and could face fines. The company must cover the costs of returning the site to its original state.

Dolan said the company has grazing and pipeline right-of-way rights to the land, so it didn't believe it needed to ask permission to access the site to search for the documents.

Lawsuits against pipeline companies are a cottage industry in some parts of the Southwest, where claims are often made that the pipelines damage property values. An attorney representing Hobbs-area residents who are suing a unit of Royal Dutch/Shell plans to observe the excavation in hopes that records related to his clients' case are turned up at the site.

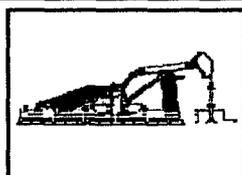
EOTT was formerly an Enron Corp. subsidiary that gained independence in 1996. It went into bankruptcy last year but reemerged in February of this year after Enron gave up the 37 percent equity stake it still had in the company.

- o [Oil futures dip as cuts considered](#)

EOTT operates 8,300 miles of crude oil pipelines in 19 states and employs about 950 workers.

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## OCD says company neglected to approve dig

RICHARD TROUT

NEWS-SUN

Staff of the state Oil Conservation Division said Houston-based EOTT Energy L.L.C. should have notified the OCD before digging a large excavation site in an effort to discover documents they now claim were buried by another company.

Bill Olson, a hydrologist for the OCD in Santa Fe, suggested EOTT made a reckless error in not notifying the OCD, which had overseen a 1995-2001 remediation project at the same site about nine miles southwest of Hobbs.

The OCD is required to be notified, Olson said, whenever a company disturbs a site where remediation has taken place.

"That was kind of our opinion," Olson said regarding the flagrant quality of EOTT's mistake, "because they're going in and destroying the already constructed cap that was there. It was put in there for a purpose, so we kind of believe they should have been getting some type of approval for that."

Olson was in charge of oversight of the remediation in question until work ended in 2001.

The excavation, described as illegal by the State Land Office, started just over a week ago. By Wednesday, an employee of ChevronTexaco alerted the local land office because he was worried about the digging compromising the area's remediation work.

A day later, New Mexico Land Commissioner Patrick Lyons and other officials arrived at the site, covering roughly 2-square-acres and nearly 50-feet-deep in one area. Parked among mounds of dirt and rock were seven construction vehicles, including bulldozers,

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front-end loaders and an excavator. Lighting had been set up around the site for night work.

Chris Williams, district supervisor of the Hobbs OCD office, agreed that EOTT did not follow the proper procedure -- such as submitting a work plan to the OCD before starting to dig.

"It was a site we already had approved (for remediation)," Williams said. "Once they go back in they have to tell us."

As far as why EOTT, neglected to submit a work plan, he could only guess.

"Most of the guys at EOTT know to let us know, but if it was a new guy (overseeing the project) maybe he didn't know," Williams said.

Of particular importance, Olson said, was a clay cap that covered the formerly contaminated soil. EOTT destroyed that cap when they upended tons of dirt and rock during excavation.

Although the remediation site's new soil is a safe blend of contaminated soil and clean soil, Olson said it is important for the clay cap to cover the site because it prevents groundwater contamination.

But when the OCD is not notified of excavation projects, he said it has no way of knowing whether those caps are returned to their original state.

"That was one of our concerns," Olson said, "that they were digging up this clay cap that was put in there for environmental protection."

On Thursday, Lyons called the EOTT's excavation work illegal because it had neglected to notify the State Land Office of its project. Because the former remediation site is located on State Trust Land, it is illegal to start digging without notifying the land office.

The land office, which presented a cease-and-desist order to EOTT on Wednesday, will be supervising the project with police once it resumes.

"What is found here is found on state land and belongs to the New Mexico taxpayers and New Mexico citizens, and we want to know what it is," Lyons said Thursday while touring the site.

On Friday, lawyers for the State Land Office were drafting papers authorizing EOTT's entry back into the site to continue in the recovery effort, but under state supervision. Those papers, and the



signatures authorizing the work were not completed by end of business day on Friday and work will resume on them on Monday.

Attorney Daniel Dolan, of Dolan & Domenici in Albuquerque, said EOTT believes Tex-New Mexico Pipeline Co. may have buried some documents that could help EOTT. The oil shipping company bought a nearby pipeline from Tex-New Mexico Pipeline in 1996 -- a year after EOTT and Texaco started the remediation project to clean up an oil spill from that pipeline.

EOTT is a former subsidiary of Enron, the financial giant that declared bankruptcy in late 2001.

Excluding the recent excavation, Dolan said EOTT has always notified OCD whenever it had to dig holes. Dolan also said the State Land Office never required permits for doing the type of excavation EOTT recently started.

"So this is kind of a change in the rules by the OCD, which is fine," Dolan said. "But the fact is, we thought we had a number of reasons for why we thought we had a valid reason to go dig a hole to find these records."

Those reasons include having both grazing and piping leases on the surface, and being involved in the 1995-2001 remediation work.

"We presumed that, because that was our hole where the remediation was done, that we pretty much had the right to go in and retrieve the records that were in our remediation site," Dolan said.

But exactly what records EOTT is hoping to find, how they got there, or why they were put there is still up in the air.

Mike Kelly, an in-house attorney for EOTT, confirmed the OCD was not contacted by EOTT prior to the excavation.

"It was the same as the State (Land Office)," Kelly said. "We went out there and we were digging, and when the OCD found out about it they did call us and they said go ahead and continue."

The OCD also asked for a closure report in 14 days, he said. A closure report states how an excavation site will be returned to its former state.

Dolan also said the OCD is EOTT's primary regulatory agency.

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**Olson, William**

---

**From:** Olson, William  
**Sent:** Friday, May 16, 2003 12:04 PM  
**To:** Prukop, Joanna; Mills, Tom  
**Cc:** Wrotenbery, Lori; Anderson, Roger; Brooks, David K  
**Subject:** Follow-up to KOAT-TV Story on EOTT Energy Excavation

Joanna and Tom,

As a follow-up to my previous e-mail, I just answered a call from Richard Trout with the Hobbs News-Sun about this case. He asked for factual information on past activities at the site. I provided him information similar to that in my e-mail to you. He also asked whether EOTT should have gotten OCD approval prior to digging this week and I told him yes.

If you have any questions please contact me.

Sincerely,



William C. Olson  
Hydrologist  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
(505) 476-3491

## Olson, William

---

**From:** Olson, William  
**Sent:** Friday, May 16, 2003 11:17 AM  
**To:** Prukop, Joanna; Mills, Tom  
**Cc:** Wrotenbery, Lori; Anderson, Roger  
**Subject:** KOAT-TV Story on EOTT Energy Excavation

Joanna and Tom,

Lori wanted me to brief you on an OCD site in Monument, NM. Attached is a copy of a May 16, 2003 Hobbs News-Sun news article that discusses recent activities at the site. This issue was also aired as a lead story by Larry Barker on KOAT-TV news broadcasts last night and this morning.

To provide you with some background on the site, Texas- New Mexico Pipeline Company was remediating oil contaminated soil from an oil pipeline leak on state land in 1995 when they discovered a former buried unlined pit which had been operated by Texaco. Both companies excavated approximately 300,000 cubic yards of contaminated soil at the site. The excavation reached approximately 45 feet in depth, into the underlying ground water. Ground water at the site was contaminated in excess of state standards. There were disputes among the companies as to who was responsible for the bulk of the contamination and the excavation remained open for several years while ground water was being remediated. During this time, the pipeline was sold to EOTT. Texaco ultimately implemented a plan to blend contaminated soil, fill the excavation and place a clay cap over the fill. Ground water was remediated to state standards and the site was closed. The OCD was involved in the regulatory oversight of the above remediation actions and issued final closure approval of the site in September of 2001.

On May 13, 2003, the OCD received several reports that EOTT Energy, LLC. was digging up the site that was previously closed in 2001. An OCD Hobbs field inspector went to the site and was denied access by the company. A State Land Office representative was also denied access. The OCD contacted EOTT's attorney and EOTT provided access to the site. He stated that EOTT received information that 3 truck loads of environmental records were buried in the former excavation and they were attempting to recover them. Attached are some of the OCD field inspectors May 13 photos. Since EOTT destroyed an engineering clay cap installed for environmental protection, OCD directed EOTT to submit a work plan for the restoration of the site.

On May 14, 2003, the SLO shut down re-excavation operations as a trespassing case that is being conducted without SLO approval. The site remains closed and on May 15, 2003 KOAT-TV aired a Larry Barker interview with Land Commissioner Pat Lyons at the site.

If you have any questions please contact me.

Sincerely,



William C. Olson  
Hydrologist  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
(505) 476-3491



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## Hunt for records shut down at site once owned by Enron

R.P. Engle & Richard Trout

NEWS-SUN



A lone white polypropylene pipe apparently marked the spot out in the middle of the oilfields west of Hobbs where workers employed by Houston-based EOTT Energy L.L.C. started digging in hope of recovering company documents.

But why the documents were there in the first place, who buried them, or why officials with the former Enron subsidiary decided to retrieve the papers earlier this week is anyone's guess.

The 40-to-50-foot deep unfinished hole, several miles southwest of Lea County Regional Airport in Hobbs, is but a part of the more than two-acre excavation site ringed by dozens of carefully laid dirt mounds that hide the site from passersby.

What is known is that the questionable excavation project started late last week when workers with Environmental Technology Group Inc. were ordered to the site by EOTT, which broke away from Enron in 1996.

But this was no ordinary recovery effort.

While a lone shovel could be seen leaning against a nearby barbed-wire fence, seven pieces of heavy construction equipment, including bulldozers, front-end loaders and an excavator, circled the pit shut down Wednesday by officials with the New Mexico State Land Office.

"Looks like they moved a lot of dirt, illegally," said Patrick Lyons, commissioner of public lands. "Man, look at this hole. Look at the excavation process. There's something here that has got to be pretty valuable."

A ChevronTexaco worker surprised by the undertaking contacted the State Land Office in Lea County because he was worried the digging could compromise a nearby remediation site. But when Leon Anderson, district resource manager with the Lea County office, arrived at the site he found something he'd never seen before.

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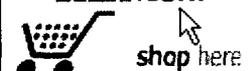
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"Let's just say it's very unusual," Anderson said.

Topsoil had been removed from much of the site before workers apparently narrowed their work on the area around the white pipe.

About 15 feet below the surface, remnants of a layer of black plastic could be seen peeking out of the dirt that edged the deep pit. A layer of rock, that varied in size from a fist to a beachball, had been dragged out of the hole in the earth. Below that was more dirt that workers were removing with an excavator. Fresh claw marks from the excavator's bucket where it scraped the walls of the pit as it reached deeply in the 20-by-20-foot-wide pit was the final mark of progress in the attempted retrieval of records -- before the cease-and-desist order from state officials stopped work on the site.

Only a week earlier, the local land office had brought a new employee to the area for training purposes. On that day, roughly 24 hours before the digging started, the land was perfectly flat and covered by vegetation, Anderson said.

"I was appalled at the amount of material that they had moved in such a short period of time," he said.

On Thursday, as Lyons trudged through the mounds of rock and dirt with whirls of dirt beating his face, he struck an adamant tone.

"We want full cooperation from the company and we want to know what they're looking for," Lyons said. "And what is found here is found on state land and belongs to the New Mexico taxpayers and New Mexico citizens, and we want to know what it is."

The project will be allowed to proceed, but only under police and State Land Office supervision, Lyons lamented. A reclamation project to return the excavation to its original state will be conducted by EOTT at the company's expense, he said.

Around the worksite a set of three lights had been set up for working at night. As Lyons suggested, the lights were just one example of the project's urgency.

"It's very obvious they're desperate to find what they want," he said.

Lyons also said EOTT may face stiff fines for digging without state permission.

While Lyons repeatedly stressed that EOTT did "illegal" digging by never contacting the State Land Office, representatives for EOTT said the company assumed it didn't have to. But their explanations as to why the digging was taking place were contradictory.

For example, EOTT spokesperson Gretchen Wise told the News-Sun that EOTT was digging to search for documents that another company had buried. These documents, she said, were related to the nearby pipeline that EOTT bought from Tex-New Mexico Pipeline Co. in 1996.

EOTT attorney Daniel Dolan, of Dolan & Domenici P.C. in Albuquerque, had a different explanation. Dolan said EOTT believes Tex-New Mexico Pipeline may have buried some documents that could help EOTT in the future. Those buried records may be related to the 2001 remediation project, they may be related to something else, or there may be no records at all, he said.

As of Thursday, EOTT officials said they did not find any documents in the excavation site.

"We have a strong (suspicion) that the records are there," he said. "We couldn't say that they're absolutely there, and we certainly can't tell you absolutely what the contents of those records are. They could be trash, they could be valuable."

As far as why EOTT didn't contact the State Land Office, Dolan provided three reasons.

"We have a grazing lease on the surface," he said. "We have a pipeline lease on the surface. And we and Texaco were involved in remediation, back in 2001, on this very site. É We presumed that, because that was our hole where the remediation was done, that we pretty much had the right to go in and retrieve the records that were in our remediation site."

But still questions remain since EOTT is a former Enron spin-off, the financial giant that filed for bankruptcy in late 2001 amid massive accounting fraud. The remains of the company trying to emerge from Chapter 11 reorganization continues to be involved in court cases leaving at least one state official wondering if the records workers were digging for had anything to do with Enron's downfall.

"They claim to have civil documents down there," Lyons said. "Whatever was buried down there before was when (EOTT was part of) Enron."

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05/13/2003



**Olson, William**

---

**From:** Anderson, Roger  
**Sent:** Wednesday, May 14, 2003 8:24 AM  
**To:** Price, Wayne; Olson, William  
**Subject:** Saunders

*Roger C. Anderson*

Roger C. Anderson  
Environmental Bureau Chief  
Oil Conservation Division

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

**From:** Johnson, Larry  
**Sent:** Wednesday, May 14, 2003 8:18 AM  
**To:** Williams, Chris  
**Cc:** Anderson, Roger; Bayliss, Randy; Brooks, David K  
**Subject:**

FYI:  
PIX of Saunders excavation May 13, 2003 attached.

I talked w/Leon Anderson of State Land office @ 8:00 this morning - he stated that SLO lawyer was talking w/EOTT and tentatively operations were shut down until 9AM today .



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DCP\_0116.JPG



DCP\_0117.JPG



DCP\_0118.JPG



DCP\_0119.JPG



DCP\_0120.JPG



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Picture\_1651.JPG



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05/13/2003



Saunders pit 13 May 03

1R-126  
North of Monument

Eddie Seay 1000  
Digging up site, restricted access, has OCD been notified?

LarryJ 1100  
Getting phone calls about Saunders pit redig, Santa Fe not advised by RP  
Will go to site

Larry J onsite  
Guard will not allow access, LJ advised site work cease until OCD confirms paperwork  
SLO Leon just left scene

LarryJ: Mike Kelly on site, Jerry Nickel  
David Brooks to Mike Kelley: OCD inspectors must be allowed access  
MK: OCD inspector on site at this moment  
RCA: contamination and cap  
RBB: HAZWOPER? (aok); work plan needed to restore site, in 14 calendar days  
MK: 3 truckloads of buried environmental records and documents

14 May 03

Eddie  
SLO shut down site, so far all day  
Earlier (ENRON) had said no SLO permission needed because EOTT had a grazing lease

15 May 03

LJ  
Shut down today, one guard on site asleep in truck  
On 5/13: Refused access 1:45 to ... just a few minutes, PMGI guard  
Permits needed, needed to get supervisor, returned in a few minutes, then Clay ETGI  
came out, no permissions at hand, on State Land, in sensitive area closed site, no business  
w/o paperwork, had already refused SLO agent access, LJ suggested to shut down  
operations to get out of any further trouble, 2 Suburbans arrive w/ attys, Houston atty  
now in NM, serious problem, ok for LJ to go in, then met Jerry Nickel, acting friendly, LJ  
not friendly  
Closure by Mark Larson: yesterday pm, at 3000-5000 ppm w/ backfill, on top of water?,  
visited site in 2000, saw GW  
Eddie (5/13): "buried records"  
Rodney Bailey seems real concerned, Texaco "interested"

11-26  
**RECEIVED**

September 6, 2001

**SEP 24 2000**

**VIA FACSIMILE: (505) 476-3462**

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Mr. William C. Olson  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

**Re: Monitoring Well Plugging and Abandoned Report, C. J. Saunders Excavation, Unit Letter J, Section 18, Township 19 South, Range 36 East, Lea County, New Mexico**

Dear Mr. Olson:

Texaco Exploration and Production Inc. (Texaco) has requested Larson and Associates, Inc. (LA) to supervise plugging and abandonment of two (2) monitoring wells (MW-13 and MW-14) at the C. J. Saunders Lease (Site) located in Unit Letter J, Section 18, Township 19 South, Range 36 East, Lea County, New Mexico. The wells were plugged as required in correspondence from the New Mexico Oil Conservation Division (NMOCD) dated July 11, 2001. Appendix A presents a copy of the letter from the NMOCD to Texaco and EOTT Energy Pipeline L.P. (EOTT). The wells were plugged by Scarborough Drilling, Inc. on September 5, 2001, in accordance with standards established by the State of New Mexico, Office of the State Engineer. Scarborough Drilling, Inc. has filed necessary plugging records with the State Engineer. Appendix B presents a copy of the reports. The remaining monitoring wells were plugged earlier by EOTT. Please call Mr. Rodney Bailey at (915) 688-2971 or myself at (915) 687-0901 if you have questions.

Sincerely,  
*Larson and Associates, Inc.*



Mark J. Larson, CPG, CGWP  
President

Encl.

cc: Mr. Rodney Bailey – Texaco  
Mr. Robert Patterson – Texaco  
Mr. Wayne Brunette - EOTT  
Mr. Chris Williams – District I

**APPENDIX A**

**NMOCD Correspondence**



# 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:

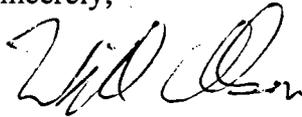
1. Texaco and EOTT shall plug all monitor wells by pulling the casing and grouting the wells from the bottom to the surface with a cement grout containing 3-5% bentonite.
2. Texaco and EOTT shall submit a plugging report for each well to the OCD Santa Fe Office by September 11, 2001 with a copy provided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

**APPENDIX B**

**Monitoring Well Plugging Reports**

STATE ENGINEER OFFICE  
WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Texaco Exploration & Production Owner's Well No. MW-13  
Street or Post Office Address P.O. Box 3109  
City and State Midland, Texas 79702

Well was drilled under Permit No. \_\_\_\_\_ and is located in the:

a. \_\_\_\_\_ ¼ \_\_\_\_\_ ¼ \_\_\_\_\_ ¼ of Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_ N.M.P.M.

b. Tract No. \_\_\_\_\_ of Map No. \_\_\_\_\_ of the \_\_\_\_\_

c. Lot No. \_\_\_\_\_ of Block No. \_\_\_\_\_ of the \_\_\_\_\_  
Subdivision, recorded in \_\_\_\_\_ Lea \_\_\_\_\_ County.

d. 6 miles SW of Hobbs  
X= \_\_\_\_\_ feet, Y= \_\_\_\_\_ feet, N.M. Coordinate System \_\_\_\_\_ Zone in  
the \_\_\_\_\_ Grant.

(B) Drilling Contractor Scarborough Drilling, Inc. License No. W 1186

Address P.O. Box 305 Lamesa, Texas 79331

Drilling Began Dec. 04, 2000 Completed Dec. 04, 2000 Type tools air rotary Size of hole 5 in.

Elevation of land surface or \_\_\_\_\_ at well is \_\_\_\_\_ ft. Total depth of well 60 ft.

Completed well is  shallow  artesian. Depth to water upon completion of well 43.92 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
2"	sch 40 pvc		+2	60			40	60

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
60	37	5	8-16 silica sand		poured
37	34	5	bentonite chips		poured;
34	0	5	cement		poured

Section 5. PLUGGING RECORD

Plugging Contractor Scarborough Drilling, Inc.  
Address P.O. Box 305 Lamesa, Texas 79331  
Plugging Method poured bentonite TD to 15'; cement to surface  
Date Well Plugged September 5, 2001

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1	0	15	cement
2	15	60	bentonite
3			
4			

Plugging approved by: \_\_\_\_\_  
State Engineer Representative

FOR USE OF STATE ENGINEER ONLY

Date Received \_\_\_\_\_ Quad \_\_\_\_\_ FWL \_\_\_\_\_ FSL \_\_\_\_\_

File No. \_\_\_\_\_ Use \_\_\_\_\_ Location No. \_\_\_\_\_



STATE ENGINEER OFFICE  
WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Texaco Exploration & Production Owner's Well No. MW-14  
Street or Post Office Address P.O. Box 3109  
City and State Midland, Texas 79702

Well was drilled under Permit No. \_\_\_\_\_ and is located in the:

- a. \_\_\_\_\_ ¼ \_\_\_\_\_ ¼ \_\_\_\_\_ ¼ \_\_\_\_\_ ¼ of Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_ N.M.P.M.
- b. Tract No. \_\_\_\_\_ of Map No. \_\_\_\_\_ of the \_\_\_\_\_
- c. Lot No. \_\_\_\_\_ of Block No. \_\_\_\_\_ of the \_\_\_\_\_  
Subdivision, recorded in Lea County.  
6 miles Sw of Hobbs
- d. X= \_\_\_\_\_ feet, Y= \_\_\_\_\_ feet, N.M. Coordinate System \_\_\_\_\_ Zone in  
the \_\_\_\_\_ Grant.

(B) Drilling Contractor Scarborough Drilling, Inc. License No. WD 1188  
Address P.O. Box 305, Lamesa, Texas 79331

Drilling Began Dec. 05, 2000 Completed Dec. 05, 2000 Type tools air rotary Size of hole 5 in.

Elevation of land surface or \_\_\_\_\_ at well 's \_\_\_\_\_ ft. Total depth of well 60 ft.

Completed well is  shallow  artesian. Depth to water upon completion of well 42.67 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
2"	sch 40 pvc		+2	60			40	60

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
60	37	5	8-16 silica sand		poured
37	34	5	bentonite chips		poured
34	0	5	cement		

Section 5. PLUGGING RECORD

Plugging Contractor Scarborough Drilling, Inc.  
Address P.O. Box 305 Lamesa, Texas 79331  
Plugging Method poured bentonite upto 15; cement to surface  
Date Well Plugged September 5, 2001  
Plugging approved by: \_\_\_\_\_

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1	0	15	cement
2	15	60	bentonite
3			
4			

State Engineer Representative

FOR USE OF STATE ENGINEER ONLY

Date Received \_\_\_\_\_

Quad \_\_\_\_\_ FWL \_\_\_\_\_ FSL \_\_\_\_\_

File No. \_\_\_\_\_ Use \_\_\_\_\_ Location No. \_\_\_\_\_





# Highlander Environmental Corp.

Midland, Texas

April 24, 2000

Via: Facsimile (505) 827-8177

Mr. William C. Olson  
Environmental Bureau  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

RECEIVED

APR 25 2000

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

**Re: Response to Work Plan for Saunders Excavation Site, Unit Letter "J",  
Section 18, Township 19 South, Range 37 East, Lea County, New Mexico**

Dear Mr. Olson:

Texaco Exploration and Production, Inc. (Texaco) has retained Highlander Environmental Corp. (Highlander) to prepare a response to correspondence from the New Mexico Oil Conservation Division (NMOCD), pertaining to a work plan submitted jointly by Texaco and EOTT Energy Pipeline Limited Partnership (EOTT) to close an excavation at the above-referenced location (Site). The excavation was produced by Texas New Mexico Pipeline Company (Tex-New Mex) after it recognized a pipeline leak at the Site. Tex-New Mex was acquired by EOTT in 1999. Texaco became involved in the project after Tex-New Mex unearthed a closed pit during its excavation activities. The pit was associated with a former production tank battery.

Texaco and EOTT ("the companies") submitted the work plan on February 9, 2000. The work plan proposed blending stockpiled soil to achieve a total petroleum hydrocarbon (TPH) clean-up level of 1,000 milligrams per kilogram (mg/kg) prior to placement back into the excavation. Further, soils that could not be blended to 1,000 mg/kg TPH would be transported to Texaco's centralized waste facility (landfarm) for treatment. The work plan also proposed two additional monitoring wells southeast (downgradient) of the excavation. The NMOCD issued its response to the work plan March 28, 2000, and requested additional information pertaining to construction of a proposed clay liner in the bottom of the excavation (i.e., thickness, compaction, etc.), soil sample collection and analyses to verify attainment of proposed remediation levels, remediation levels for benzene, toluene, ethylbenzene, xylene (collectively referred to as BTEX) and proposed monitoring well information (i.e., locations, construction, etc.). Appendix A presents NMOCD correspondence.

During our telephone discussion (April 7, 2000), Highlander proposed modifying the TPH remediation level (1,000 mg/kg), to a range between 3,500 to 5,000 mg/kg. The NMOCD was receptive to the modified cleanup, and requested Highlander provide

justification to support the modified cleanup level. Highlander provides the following justification for modifying the TPH cleanup level.

- A soil sample exhibiting the highest concentrations of TPH and BTEX will be tested using the synthetic precipitation leaching procedure (SPLP), to demonstrate the mobility of the organic analytes. The SPLP will be performed using EPA method SW-846-1312, and the extract will be analyzed for TPH (gasoline and diesel range hydrocarbons) by test method SW-846-8015 modified. The extract may also be analyzed for BTEX (method 8021B), if soil analyses report concentrations above NMOCD recommended remediation levels for benzene (10 mg/kg) and total BTEX (50 mg/kg);
- The blended soil will be mixed to a prescribed ratio using a commercial-grade, high nitrogen fertilizer to promote further degradation of residual hydrocarbons by indigenous microbial populations;
- A layer of clean soil (buffer), approximately 2 feet thick, will be placed in the bottom of the excavation prior to emplacement of blended soil;
- A clay liner (cap), approximately 2 feet thick, will be placed over the blended soil, crowned, and compacted to 95% proctor density to minimize infiltration of precipitation;
- A layer of topsoil will be placed over the clay cap and planted with grazing forage (e.g., hay grazer grass) to prevent erosion of the cap.

On April 13, 2000, Highlander personnel supervised collection of soil samples from the stockpiles and bottom of the excavation. The samples were collected for BTEX, TPH, SPLP and field headspace analysis. The soil is currently contained in two large soil piles and four smaller piles. A pile of clean soil (overburden) is also present south of the Site. Grab samples of soil were collected from three to four randomly selected locations at each pile. The larger piles were divided into four approximately equal sections, and three to four grab samples were randomly collected from each section. The samples were collected from the bucket of a backhoe, which was used to reach into the interior of the piles. A stainless steel sample trowel was used to collect the soil samples.

Samples were also collected from the bottom of the excavation from a depth of approximately 0 to 1 foot. The excavation was divided into two approximately equal parts, and four grab samples were randomly collected from each part. The grab samples for each pile or section were placed in a clean plastic sample bag, thoroughly mixed, and immediately transferred to clean laboratory-prepared sample jar. The sample jars were labeled, placed in an ice chest and chilled. A soil headspace gas analysis was performed on the remaining volume of soil in the sample bags. The bags were sealed, and after the



samples had reached ambient temperature, the probe of a photoionization detector (PID) was inserted into the sample bag. The PID measured the concentration of ionizable hydrocarbons in the sample vapors. The concentration of ionizable hydrocarbons was displayed in parts per million (ppm). The PID (Thermal Environmental Equipment, Model 580B) was calibrated to isobutylene. Figure 1 presents a Site drawing, location of soil piles, composite sample numbers and PID readings. The PID readings ranged from 4.8 ppm (Composite Sample #1) to 233.8 ppm (Composite Sample #11). The excavation samples recorded PID readings of 5.6 ppm (Composite Sample #14) and 4.0 ppm (Composite Sample #15). The samples were transferred, under chain-of-custody control, to Trace Analysis, Inc., Lubbock, Texas, for TPH analysis by method SW-846-8015 modified (gasoline and diesel range hydrocarbons). Additionally, composite sample #2 and composite sample #11 will be analyzed for BTEX, since PID measurements exceeded 100 ppm. The soil sample exhibiting the highest BTEX and TPH concentrations will be tested by SPLP (method SW-846-1312), to demonstrate the mobility of the organic analytes.

Soil piles exhibiting TPH concentrations that may not blend to the modified cleanup level will be transported to Texaco's centralized waste management (landfarm) facility for treatment. Clean soil will be transported to the Site for blending with the TPH affected soil. Per our telephone conversation, samples of the blended soil will be collected and analyzed to verify attainment of the modified cleanup level. A composite sample will be collected for every 2,500 to 3,000 cubic yards of blended soil, and analyzed for TPH, by method SW-846-8015 modified (gasoline and diesel range hydrocarbons). The samples will be collected with a stainless steel sample trowel or shovel, and placed in clean laboratory-prepared sample jars. The samples will be labeled, placed in an ice chest, chilled, and transferred, under chain-of-custody control, to a qualified laboratory. A portion of each sample will be retained for headspace gas analysis, using the procedure previously described. Samples exhibiting PID readings above 100 ppm will be analyzed for BTEX, by method SW-846-8021B. The blended soil will be stockpiled until the laboratory results verify attainment of the cleanup level. Additional blending may be necessary if the laboratory analysis indicate that the cleanup has not been attained. Following cleanup verification, the soil will be placed in the excavation, evenly spread, and compacted to a depth equal to approximate ground level. The sampling trowel or shovel will be thoroughly cleaned between sample events by washing with laboratory-grade detergent, and rinsing with distilled water.

A layer of clay, approximately 2 feet thick, will be placed over the blended soil, crowned, and compacted to minimize infiltration of precipitation. The soil will be compacted to 95% proctor density. A final cover of topsoil, approximately 18-inches thick will be placed over the clay cap, and seeded with forage grass (e.g., hay grazer, etc.).

Two additional monitoring wells will be installed at the Site following completion of blending activities. The wells will be installed in native soil at the approximate



locations shown on Figure 1. The depth of the wells will be determined from depth-to-groundwater level measurements collected from the existing wells. The wells will be drilled to depths sufficient to accommodate approximately 20 feet of well screen. Approximately 15 feet of well screen will extend into groundwater, and five feet of screen will be above groundwater to compensate for seasonal fluctuation and observe any phase-separated hydrocarbon (PSH) that might be present. The wells will be constructed with four (4) inch diameter schedule 40 PVC threaded casing and factory slotted screen. The well screen will be surrounded with graded silica sand, placed into the annulus to a depth approximately 2 feet above the screen. A layer of bentonite pellets, approximately 2 feet thick, will be placed over the sand, and hydrated with potable water. The remainder of the annulus will be filled with cement and bentonite grout, to about one (1) foot below ground. The wells will be secured with locking steel protectors anchored in a concrete pad measuring approximately 3 feet by 3 feet. The wells will be developed by bailing to remove fine-grained sediment disturbed during drilling, and to ensure collection of representative groundwater samples. The water will be placed in a portable tank, picked up by a licensed water hauler, and disposed in a permitted Class II disposal well.

Groundwater samples will be collected from all wells, and analyzed for BTEX, anions, cations, and total dissolved solids. Prior to sampling, the wells will be inspected for PSH, and measured for depth-to-groundwater. The depth-to-groundwater measurements will be used to prepare a groundwater potentiometric surface map. If a sufficient thickness of PSH is observed in the wells, a sample may be collected for fingerprint analysis, by gas chromatography (GC). Groundwater samples will not be collected from wells with measured PSH. The wells will be purged to remove at least 3 casing volumes of groundwater, using an electric submersible pump, or bailer. The groundwater will be contained in a portable tank, picked up by a licensed water hauler, and disposed in a permitted Class II disposal well. The samples will be collected using dedicated disposable polyethylene bailers, equipped with nylon line. The samples will be carefully transferred from the bailer to laboratory-prepared containers. The containers will be labeled, placed in an ice chest, chilled, and transferred to the laboratory, under chain-of-custody control. Quality Assurance/Quality Control (QA/QC) samples (i.e., duplicate, trip blank, field blank, etc.) will be collected for data validation. Instrument calibration and field notes will be maintained in a bound field notebook.

The wells will be surveyed by a New Mexico registered professional land surveyor to determine horizontal location, as well as ground and top of PVC casing elevations. The locations of the wells will be referenced to the existing monitoring wells. The ground and top of PVC casing elevations for the existing wells may be checked for survey accuracy. All equipment coming in contact with groundwater may have the potential for cross contamination if not properly decontaminated, therefore, all such equipment (i.e., water level indicator, interface probe, submersible pump, etc.) will be thoroughly cleaned between wells using laboratory grade detergent, followed by rinsing with potable water.



Mr. William C. Olson  
April 24, 2000  
Page 5

A final report will be prepared upon receipt of analytical data from the laboratory. All data will be presented in tabular format, and the report will contain a discussion of the field sampling techniques, laboratory results, drawings and photographs. The groundwater sample analyses will be compared to applicable New Mexico Water Quality Control Commission human health and domestic water quality standards.

Please call Mr. Rodney Bailey at (505) 397-0422, or myself at (915) 682-4559, if you have questions.

Sincerely,  
*Highlander Environmental Corp.*

A handwritten signature in black ink, appearing to be "M. Larson", with a horizontal line extending to the right.

Mark J. Larson, C.P.G.  
Senior Project Manager

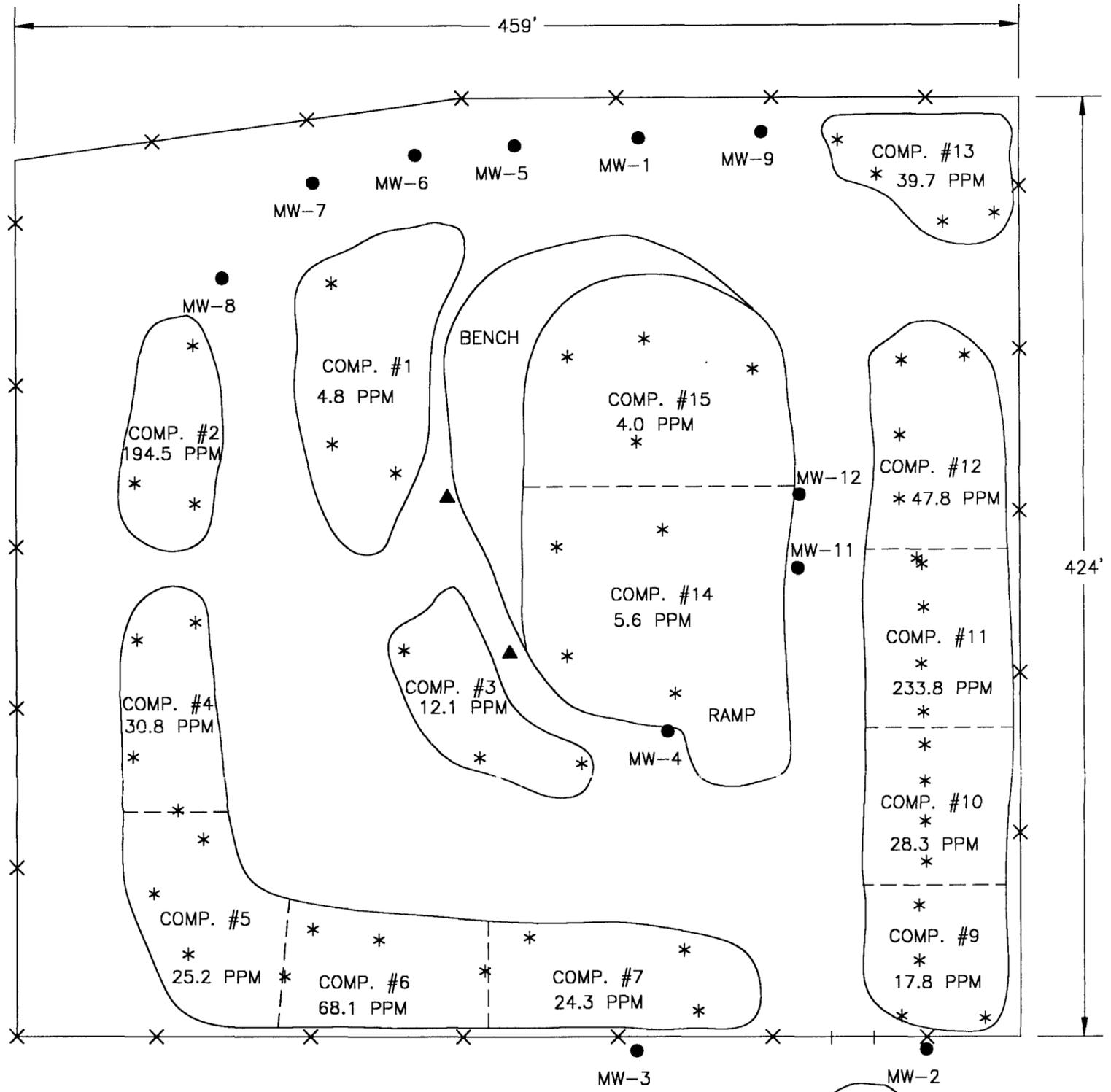
Encl.

cc: Mr. Glen Waldrop - EOTT  
Mr. Robert Patterson - Texaco  
Mr. Chris Williams - NMOCD Hobbs District



## Figures





**LEGEND**

\* SOIL SAMPLE LOCATION (APPROXIMATE)

MW-1  
● MONITOR WELL LOCATION

6.4 PPM PID READING OF COMPOSITE SOIL SAMPLE IN PARTS PER MILLION TOTAL IONIZABLE HYDROCARBON

▲ PROPOSED MONITOR WELL LOCATION

**FIGURE 1**

LEA COUNTY, NEW MEXICO

TEXACO EXPLORATION AND PRODUCTION, INC.

C.J. SAUNDERS PIT SITE LAYOUT

HIGHLANDER ENVIRONMENTAL CORP.  
MIDLAND, TEXAS

DATE:  
4/17/00

DWN. BY:  
JDA

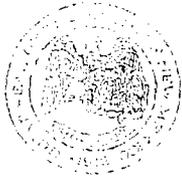
FILE:  
C:\TEXACO\1370  
SITE-LAYOUT

SCALE AS SHOWN

Appendix A

NMOCD Correspondence  
March 28, 2000





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.

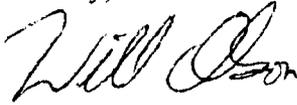
The OCD has the following comments and requests for information regarding the above referenced work plan:

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,



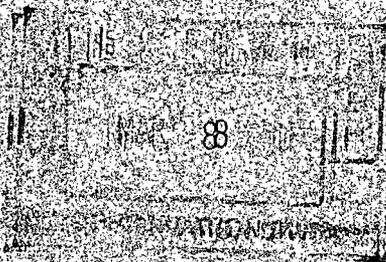
William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

**L**arson &  
Associates, Inc.  
Environmental Consultants

February 27, 2001

Mr. William C. Olson  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505



**Re: Final Closure Report, C. J. Saunders Excavation, Unit Letter J, Section 18,  
Township 19 South, Range 36 East, Lea County, New Mexico**

Dear Mr. Olson:

Please find the enclosed report detailing closure of an excavation at the C. J. Saunders Lease located in Unit Letter J, Section 18, Township 19 South, Range 36 East, Lea County, New Mexico. The report is submitted in accordance with the work plan ("Response to Work Plan for Saunders Excavation Site, Unit Letter 'J', Section 18, Township 19 South, Range 37 East, Lea County, New Mexico, April 24, 2000" and "Laboratory Analysis 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, May 8, 2000") approved by the NMOCB on May 10, 2000. Please call Mr. Rodney Bailey at (915) 688-2971 or myself at (915) 687-0901 if you have questions.

Sincerely,

*Larson & Associates, Inc.*

Mark J. Larson, CPG, CGWP  
President

Encl

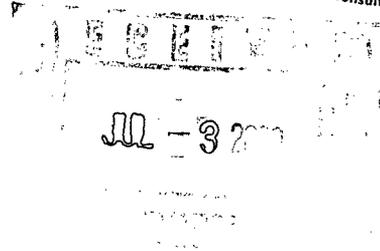
cc: Mr. Rodney Bailey - Texaco  
Mr. Robert Patterson - Texaco  
Mr. Wayne Brunette - EOTT  
Mr. Chris Williams - District I

June 23, 2000

William C. Olson  
Hydrologist  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505



Re: Site Closure  
TNM 95-10 (Saunders) Leak Site  
Lea County, New Mexico



Dear Mr. Olson:

As per our conversation, Environmental Technology Group, Inc. (ETGI), on behalf of EOTT Energy Corp. (EOTT), has been requested to inquire as to the basis and rationale for the excavation closure, by Texaco, at the above referenced site. As discussed, EOTT is concerned with closure of the existing excavation with the south/southwest side walls demonstrating Total Petroleum Hydrocarbons (TPH) concentrations in excess of New Mexico Oil Conservation Division (NMOCD) guidelines (see attached laboratory results).

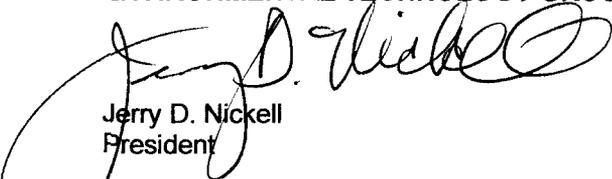
At this time EOTT has requested that ETGI submit the laboratory results from a sampling event conducted on February 16, 2000. This sampling event was conducted by EOTT to evaluate the visually impacted side walls (located at the base of the excavation in the south/southwest area) prior to closure work plan development, submission of work plan to NMOCD, and excavation closure. Laboratory analysis reports and a site map depicting the sampling locations are attached for your review.

In the interim period Texaco has submitted a work plan to the NMOCD (Highlander Env.) for closure of the excavation with out assessing the extent and/or residual concentrations of contamination as referenced above. In addition, the Texaco work plan (Highlander Env.) was not reviewed or approved by EOTT prior to submission to NMOCD, approval by NMOCD, and/or implementation by Texaco.

At this time it is EOTTs' intent to keep the NMOCD current on all information and available data for the referenced site, however all information and reporting for the current site closure activities remain the responsibility of Texaco.

If additional information is needed, please contact me at (915) 522-1139 or FAX (915) 520-4310.

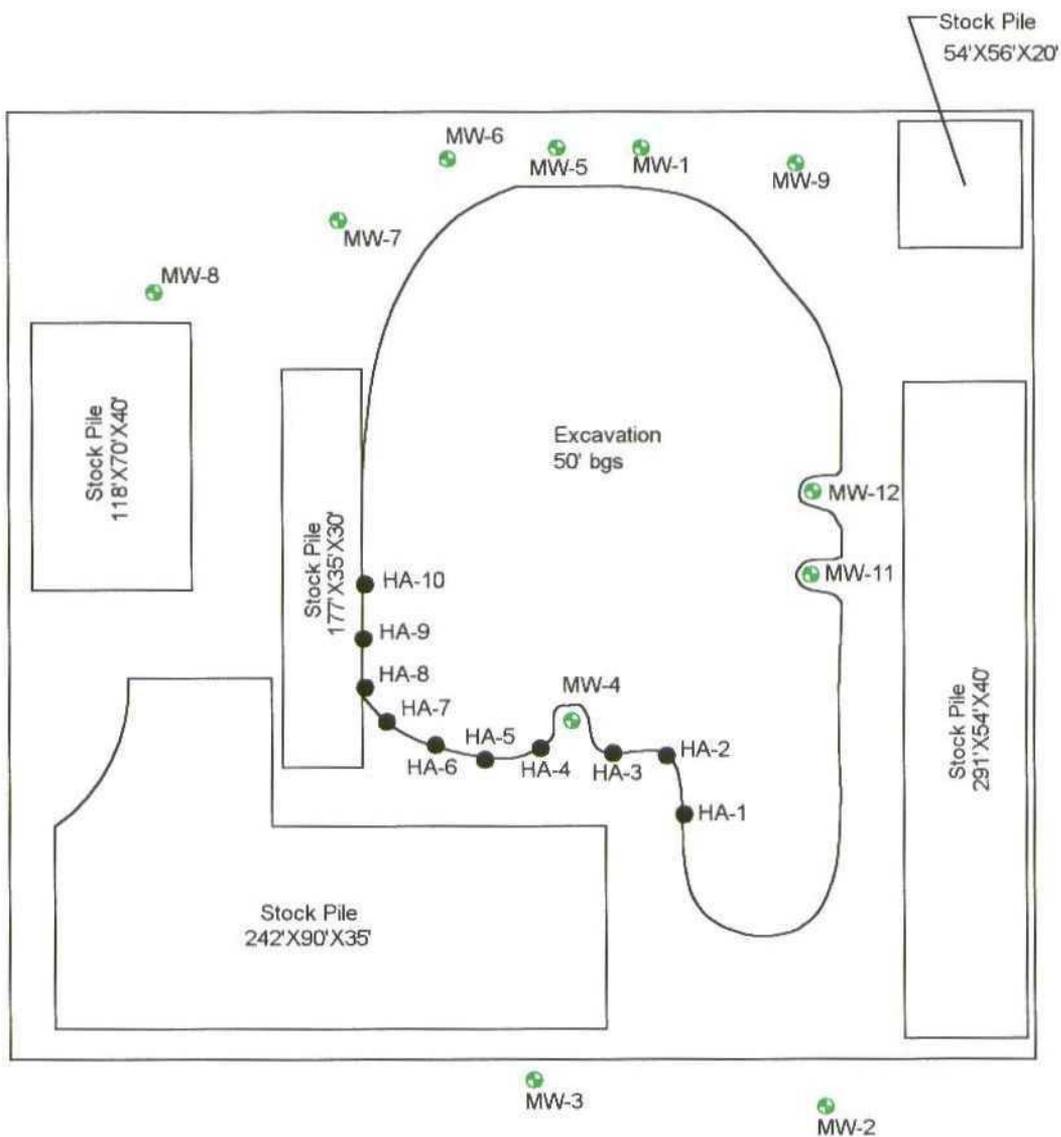
Sincerely,  
**ENVIRONMENTAL TECHNOLOGY GROUP, INC.**



Jerry D. Nickell  
President

Attachments: Site Sampling Map  
Laboratory Analysis Reports

C: Glenn Waldrop, EOTT Energy Pipeline Limited Partnership  
file

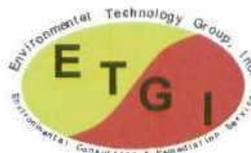


**LEGEND:**

-  Monitoring Well Locations (Installed by KEI)
-  Hand Augar Points (2-16-00)

**Figure 2  
Site Map**

**EOTT Energy Corp.  
TNM 95-10  
Lea County, NM**



**Environmental Technology  
Group, Inc.**

Scale: 1" = 85'	Prep By: RS	Checked By: JT
August 19, 1999	ETGI Project # EOT 2046C	

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
ATTN: MR. JERRY NICKELL  
P.O. BOX 4845  
MIDLAND, TEXAS 79704  
FAX: 915-520-4310

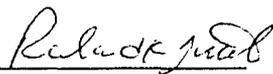
Sample Type: Soil  
Sample Condition: Intact/Iced  
Project #: None Given  
Project Name: Saunder  
Project Location: Monument, N.M.

Sampling Date: 02/16/00  
Receiving Date: 02/17/00  
Analysis Date: 02/19/00

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
23640	HA 1	171	2015
23641	HA 2	1360	7861
23642	HA 3	758	16813

%INSTRUMENT ACCURACY	98	104
% EXTRACTION ACCURACY	106	109
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

  
Raland K. Tuttle

2-22-00  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
ATTN: MR. JERRY NICKELL  
P.O. BOX 4845  
MIDLAND, TEXAS 79704  
FAX: 915-520-4310

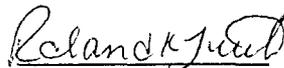
Sample Type: Soil  
Sample Condition: Intact/lced  
Project #: None Given  
Project Name: Saunder  
Project Location: Monument, N.M.

Sampling Date: 02/16/00  
Receiving Date: 02/17/00  
Analysis Date: 02/20/00

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
23643	HA 4	358	18122
23644	HA 5	360	12604
23645	HA 6	293	9833
23646	HA 7	1304	18945
23647	HA 8	497	12152
23648	HA 9	683	13970
23649	HA 10	439	11898

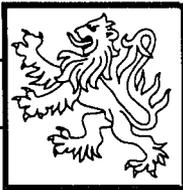
QUALITY CONTROL	502	522
TRUE VALUE	500	500
% PRECISION	100	104
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO

  
Roland K. Tuttle

2-22-00  
Date





# Highlander Environmental Corp.

Midland, Texas

June 12, 2000

**Via: Facsimile (505) 827-8177**

Mr. William C. Olson  
Environmental Bureau  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

**Re: Nutrient Additive for Blended Soil, Saunders Excavation Site, Unit Letter "J", Section 18, Township 19 South, Range 37 East, Lea County, New Mexico**

Dear Mr. Olson:

This letter serves as a confirmation and clarification to our telephone call on Thursday, June 8, 2000, regarding the addition of nutrient to blended soil at the above-referenced location. Based on our telephone call, nutrient will be added to blended soil with total petroleum hydrocarbon (TPH) concentrations over 2,000 milligrams per kilogram (mg/kg). The nutrient (Micro-Blaze) was added to the first lift of blended soil, which reported a TPH concentration of 553 mg/kg (GRO and DRO), to provide an additional level of protection above the buffer of clean soil (2 to 3 feet) placed in the bottom of the excavation. Micro-Blaze will be added to subsequent lifts reporting TPH concentrations 2,000 mg/kg or greater.

Please call Rodney Bailey at (915) 688-2971, or myself at (915) 682-4559, if you have questions.

Sincerely,

*Highlander Environmental Corp.*

Mark J. Larson, CPG, CGWP  
Senior Project Manager

cc: Mr. Rodney Bailey - Texaco  
Mr. Robert Patterson - Texaco  
Mr. Glen Waldrop - EOTT  
Mr. Chris Williams - NMOCD Hobbs District



# Highlander Environmental Corp.

Midland, Texas

May 8, 2000

Via: Facsimile (505) 827-8177

Mr. William C. Olson  
Environmental Bureau  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

RECEIVED

MAY 09 2000

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

**Re: 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**

Dear Mr. Olson:

Texaco Exploration and Production, Inc. (Texaco) retained Highlander Environmental Corp. (Highlander) to collect soil samples from an excavation and stockpiles at the above-referenced location (Site). The Site is located near Monument, New Mexico, in Section 18, Township 19 South, and Range 37 East, Lea County, New Mexico.

The Site was the location of a leaking pipeline owned by Texas-New Mexico Pipeline Company (Tex-New Mex). Following recognition of the leak, Tex-New Mex excavated the leak area, and unearthed a closed pit associated with a production tank battery, once operated by Texaco. EOTT became involved after it acquired Tex-New Mex, in 1999. Soil from the excavated area was stockpiled around the excavation.

On February 9, 2000, Texaco and EOTT (the "companies") submitted a joint work plan to the New Mexico Oil Conservation Division (NMOCD), to address closure of the Site. Following its review, the NMOCD requested additional information on March 28, 2000. On April 24, 2000, Highlander submitted the additional information, and proposed a TPH cleanup of 3,000 to 5,000 milligrams per kilogram (mg/kg). Justification for the proposed cleanup level included:

- Collecting soil samples from the piles for BTEX and TPH analyses, and synthetic precipitation leaching procedure (SPLP). The SPLP was proposed to determine the mobility of organic analytes in the sample.
- Mixing the blended soil with a prescribed ratio of commercial-grade, high nitrogen fertilizer to promote further degradation of residual hydrocarbons by indigenous microbial populations;

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- Placing a layer of clean soil (buffer), approximately 2 feet thick, in the bottom of the excavation prior to emplacement of blended soil;
- Installing a clay liner (cap), approximately 2 feet thick, over the blended soil, crowning and compacting to 95% proctor density to minimize infiltration of precipitation;
- Placing a layer of topsoil over the clay cap, and planting with grazing forage (e.g., hay grazer grass) to prevent erosion.

On April 13, 2000, Highlander personnel collected soil samples from the stockpiles and bottom of the excavation, using sample procedures presented in correspondence to the NMOCD on April 24, 2000. Figure 1 presents the sample locations.

Fifteen samples were submitted, under chain-of-custody control, to Trace Analysis, Inc., located in Lubbock, Texas, and analyzed for gasoline range (GRO) and diesel range (DRO) hydrocarbons by method SW-846-8015. Samples Comp. #2 and Comp. #11 were also analyzed for BTEX, since soil headspace gas readings exceeded 100 parts per million (ppm). Table 1 presents a summary of the headspace gas, BTEX and TPH analyses. Appendix A presents the laboratory report.

Benzene was below the test method detection limit concentration (<0.05 mg/kg) in samples Comp. #2 and Comp. #11. Total BTEX was reported in samples Comp. #2 and Comp. #11 at 1.624 mg/kg and 0.742 mg/kg, respectively. The NMOCD Recommended Remediation Action Level (RRAL) for total BTEX is 50 mg/kg.

In accordance with the work plan, dated April 24, 2000, the sample reporting the highest TPH level was tested using the synthetic precipitation leaching procedure (SPLP), to demonstrate the mobility of the organic analytes. The sample reporting the highest TPH concentration was sample Comp. #4, and reported 2,527 mg/kg. The SPLP was performed using EPA method SW-846-1312, and the extract was analyzed for TPH (gasoline and diesel range hydrocarbons) by test method SW-846-8015. The SPLP results did not report GRO and DRO above the test method detection limit of 5 mg/kg. Appendix B presents the SPLP analyses.

Based on the BTEX, TPH, SPLP analyses, and justification presented to the NMOC on April 24, 2000, a soil cleanup level of 3,000 to 5,000 mg/kg is requested for the Site. Texaco and EOTT would like to begin soil blending and backfilling the excavation, in accordance with the work plan dated April 24, 2000.

The companies look forward to your response. Please call Mr. Rodney Bailey at (505) 397-0422, or myself at (915) 682-4559, if you have questions.



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Sincerely,  
*Highlander Environmental Corp.*



Mark J. Larson, C.P.G.  
Senior Project Manager

Encl.

cc: Mr. Rodney Bailey - Texaco  
Mr. Glen Waldrop - EOTT  
Mr. Robert Patterson - Texaco  
Mr. Chris Williams - NMOCD Hobbs District



Tables



**Table 1: Summary of PID, BTEX and TPH Analyses from Soil Samples**  
 Texaco Exploration and Production, Inc.  
 C. J. Saunders Excavation Site, Lea County, New Mexico

Sample Number	Sample Date	PID (ppm)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	TPH (mg/kg)
Comp. # 1	04/13/00	4.8	-	-	-	-	<5	<50	<55
Comp. # 2	04/13/00	194.5	<0.05	0.054	<0.05	1.57	261	1,120	1,381
Comp. # 3	04/13/00	12.1	-	-	-	-	55	266	321
Comp. # 4	04/13/00	30.8	-	-	-	-	77	2,450	2,527
Comp. # 5	04/13/00	25.2	-	-	-	-	56	1,900	1,956
Comp. # 6	04/13/00	68.1	-	-	-	-	96	488	584
Comp. # 7	04/13/00	24.3	-	-	-	-	57	839	896
Comp. # 8	04/13/00	6.4	-	-	-	-	<5	90	90
Comp. # 9	04/13/00	17.8	-	-	-	-	70	78	148
Comp. # 10	04/13/00	28.3	-	-	-	-	<5	160	160

Notes:

1. (mg/kg): Milligrams per kilogram
2. (ppm): Parts Per Million
3. GRO: Gasoline Range Hydrocarbons
4. DRO: Diesel Range Hydrocarbons
5. TPH: Total Petroleum Hydrocarbons (GRO & DRO)
6. <: Concentration less than test method detection limits
7. --: No data available

Table 1: (continued) Summary of PID, BTEX and TPH Analyses from Soil Samples  
 Texaco Exploration and Production, Inc.  
 C. J. Saunders Excavation Site, Lea County, New Mexico

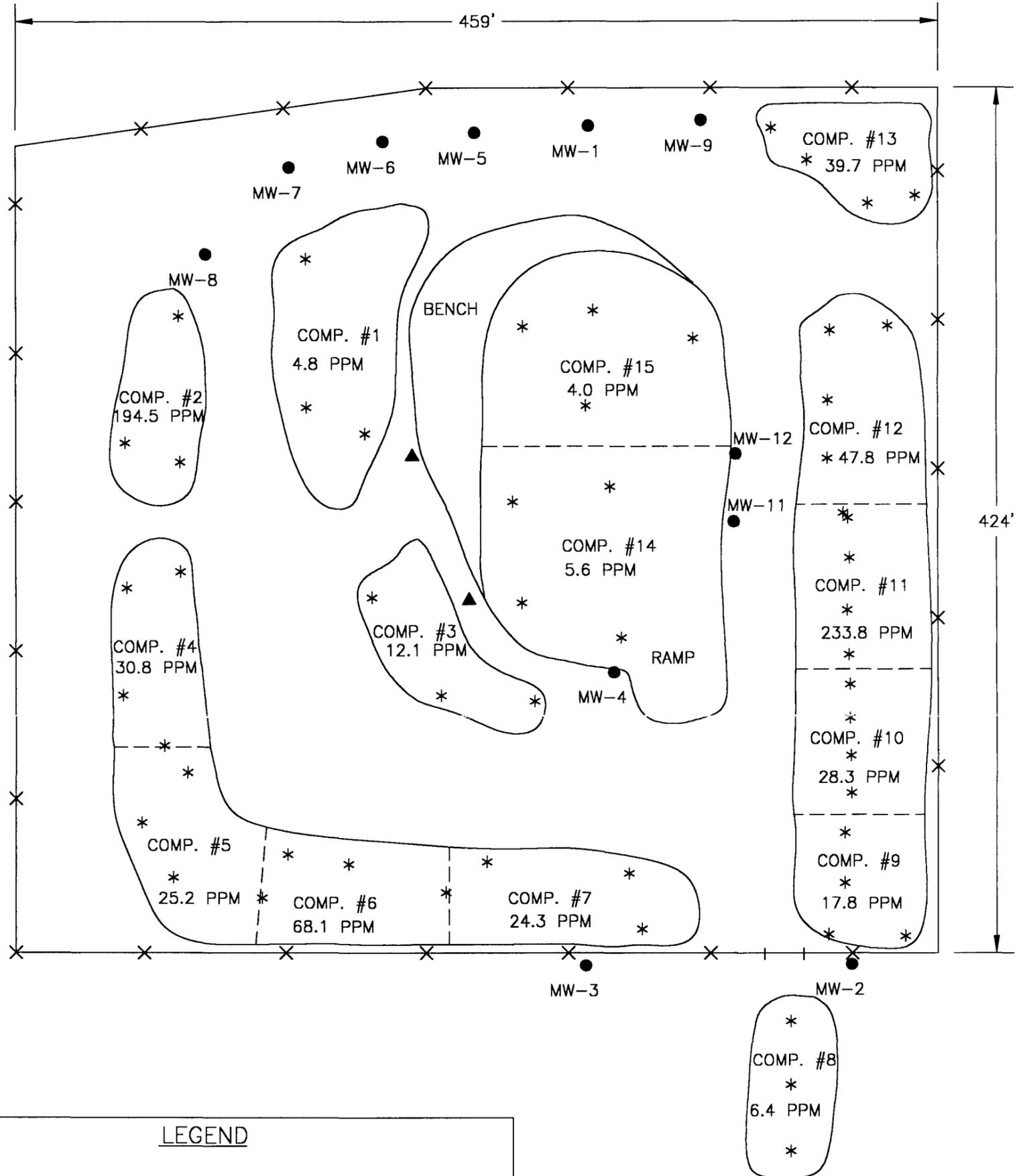
Sample Number	Sample Date	PID (ppm)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	TPH (mg/kg)
Comp. # 11	04/13/00	233.8	<0.05	0.06	<0.05	0.682	131	431	562
Comp. # 12	04/13/00	47.8	-	-	-	-	34	231	265
Comp. # 13	04/13/00	39.7	-	-	-	-	46	<50	46
Comp. # 14	04/13/00	5.6	-	-	-	-	<5	50	50
Comp. # 15	04/13/00	4.0	-	-	-	-	<5	<50	<55

Notes:

1. (mg/kg): Milligrams per kilogram
2. (ppm): Parts Per Million
3. GRO: Gasoline Range Hydrocarbons
4. DRO: Diesel Range Hydrocarbons
5. TPH: Total Petroleum Hydrocarbons (GRO & DRO)
6. <: Concentration less than test method detection limits
7. --: No data available

## Figures





**LEGEND**

\* SOIL SAMPLE LOCATION (APPROXIMATE)

MW-1  
● MONITOR WELL LOCATION

6.4 PPM PID READING OF COMPOSITE SOIL SAMPLE IN PARTS PER MILLION TOTAL IONIZABLE HYDROCARBON

▲ PROPOSED MONITOR WELL LOCATION

**FIGURE 1**

LEA COUNTY, NEW MEXICO

TEXACO EXPLORATION AND PRODUCTION, INC.

C.J. SAUNDERS PIT SITE LAYOUT

HIGHLANDER ENVIRONMENTAL CORP.  
MIDLAND, TEXAS

DATE:  
4/17/00

DWN. BY:  
JDA

FILE:  
C:\TEXACO\1370  
SITE-LAYOUT

SCALE AS SHOWN

**Appendix A**  
**Trace Analysis, Inc. Reports**





5701 Abbotkin Avenue, Suite B Lubbock Texas 79424 806•378•1288 806•794•1286 FAX 806•794•1288  
4725 Ripley Avenue, Suite A El Paso Texas 79922 838•588•3443 915•585•3442 FAX 915•585•4844  
E-Mail: lab@traceanalysis.com

### Analytical and Quality Control Report

Mark Larson  
Highlander Environmental Services  
1910 N. Big Spring St.  
Midland, TX 79705

Report Date: 4/28/00

Project Number: 1370  
Project Name: C.J. Saunders - Texaco  
Project Location: N/A

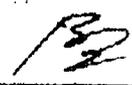
Order ID Number: A00041503

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
144567	Comp #1	Soil	4/13/00	9:05	4/15/00
144568	Comp #2	Soil	4/13/00	9:20	4/15/00
144569	Comp #3	Soil	4/13/00	9:35	4/15/00
144570	Comp #4	Soil	4/13/00	9:55	4/15/00
144571	Comp #5	Soil	4/13/00	10:10	4/15/00
144572	Comp #6	Soil	4/13/00	10:20	4/15/00
144573	Comp #7	Soil	4/13/00	10:30	4/15/00
144574	Comp #8	Soil	4/13/00	10:40	4/15/00
144575	Comp #9	Soil	4/13/00	10:55	4/15/00
144576	Comp #10	Soil	4/13/00	11:05	4/15/00
144577	Comp #11	Soil	4/13/00	11:20	4/15/00
144578	Comp #12	Soil	4/13/00	11:30	4/15/00
144579	Comp #13	Soil	4/13/00	11:40	4/15/00
144580	Comp #14	Soil	4/13/00	11:55	4/15/00
144581	Comp #15	Soil	4/13/00	12:05	4/15/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 8 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

  
Dr. Blair Leftwich, Director

Report Date: 4/28/00

Order ID Number: A00041503

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C.J. Saunders - Texaco

N/A

## Analytical Results Report

Sample Number: 144567  
Description: Comp. #1

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg)									
DRO	<50	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg)									
GRO	<5	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144568  
Description: Comp. #2

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
BTEX (mg/Kg)									
MTBE	<0.05	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
Benzene	<0.05	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
Toluene	0.054	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
Ethylbenzene	<0.05	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
m,p,o-Xylene	1.57	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
Total BTEX	1.62	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001
Surrogate (mg/Kg)									
TFT	7.13	50				RC	PB01803	QC02197	
4-BFB	7.41	50				RC	PB01803	QC02197	
TPH DRO (mg/Kg)									
DRO	1120	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg)									
GRO	261	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144569  
Description: Comp. #3

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg)									
DRO	266	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg)									
GRO	55	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144570  
Description: Comp. #4

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg)									
DRO	2450	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg)									
GRO	77	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

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N/ASample Number: 144571  
Description: Comp. #5

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	1900	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg) GRO	56	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144572  
Description: Comp. #6

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	488	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg) GRO	96	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144573  
Description: Comp. #7

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	839	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg) GRO	57	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144574  
Description: Comp. #8

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	90	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg) GRO	65	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144575  
Description: Comp. #9

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	78	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50
TPH GRO (mg/Kg) GRO	70	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1

Sample Number: 144576  
Description: Comp. #10

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	160	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02307	50

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N/A

TPH GRO (mg/Kg)	GRO	<5	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1
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Sample Number: 144577  
Description: Comp. #11

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL	
BTEX (mg/Kg)										
Benzene	<0.05	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001	
Toluene	0.06	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001	
Ethylbenzene	<0.05	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001	
M,P,O-Xylene	0.682	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001	
Total BTEX	0.743	50	S 8021B	4/18/00	4/18/00	RC	PB01803	QC02197	0.001	

Surrogate (mg/Kg)	Result	Dilution	Spike Amount	% Rec.	% Rec Limit	Analyst	Prep Batch #	QC Batch #	RDL
TFT	5.8	50	0.1	116	72 - 128	RC	PB01803	QC02197	
4-BFB	5.72	50	0.1	115	72 - 128	RC	PB01803	QC02197	

TPH DRO (mg/Kg)	DRO	431	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02308	50
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TPH GRO (mg/Kg)	GRO	131	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1
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Sample Number: 144578  
Description: Comp. #12

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL	
TPH DRO (mg/Kg)										
DRO	231	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02308	50	
TPH GRO (mg/Kg)										
GRO	34	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1	

Sample Number: 144579  
Description: Comp. #13

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL	
TPH DRO (mg/Kg)										
DRO	<50	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02308	50	
TPH GRO (mg/Kg)										
GRO	46	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1	

Sample Number: 144580  
Description: Comp. #14

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL	
TPH DRO (mg/Kg)										
DRO	50	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02308	50	
TPH GRO (mg/Kg)										
GRO	<5	1	8015B	4/18/00	4/18/00	RC	PB01804	QC02198	0.1	

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N/ASample Number: 144581  
Description: Comp. #15

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH DRO (mg/Kg) DRO	<50	1	Mod. 8015B	4/19/00	4/25/00	BP	PB01936	QC02308	50
TPH GRO (mg/Kg) GRO	<5	1	8015U	4/18/00	4/18/00	RC	PB01804	QC02198	5

### Quality Control Report Method Blanks

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
MTBE (mg/Kg)		<0.05	0.05	4/18/00	PB01803	QC02197
Benzene (mg/Kg)		<0.05	0.05	4/18/00	PB01803	QC02197
Toluene (mg/Kg)		<0.05	0.05	4/18/00	PB01803	QC02197
Ethylbenzene (mg/Kg)		<0.05	0.05	4/18/00	PB01803	QC02197
M,P,O-Xylene (mg/Kg)		0.072	0.05	4/18/00	PB01803	QC02197
Total BTEX (mg/Kg)		0.072	0.05	4/18/00	PB01803	QC02197
Surrogate		Result	Spike Amount	% Rec.	% Rec. Limit	QC Batch #
TFT (mg/Kg)		6.74	0.1	135	72 - 128	QC02197
4-MIB (mg/Kg)		6.46	0.1	129	72 - 128	QC02197

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
DRO (mg/Kg)		<50	50	4/25/00	PB01936	QC02307
DRO (mg/Kg)		<50	50	4/25/00	PB01936	QC02308

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
GRO (mg/Kg)		<5	0.1	4/18/00	PB01804	QC02198

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N/A

### Quality Control Report Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	MTBE (mg/Kg)		1	0.1	4.63	93		80 - 120	-	QC02197
MS	Benzene (mg/Kg)	<0.05	1	0.1	4.94	99		80 - 120	-	QC02197
MS	Toluene (mg/Kg)	0.06	1	0.1	5.74	114		80 - 120	-	QC02197
MS	Ethylbenzene (mg/Kg)	<0.05	1	0.1	5.72	114		80 - 120	-	QC02197
MS	M,P,O-Xylene (mg/Kg)	0.682	1	0.3	16.4	109		80 - 120	-	QC02197
Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MS	TFT (mg/Kg)	5.24	1	0.1	RC	105		72 - 128	PB01803	QC02197
MS	4-BFB (mg/Kg)	4.69	1	0.1	RC	94		72 - 128	PB01803	QC02197
MSD	MTBE (mg/Kg)		1	0.1	4.56	91	2	-	0 - 20	QC02197
MSD	Benzene (mg/Kg)	<0.05	1	0.1	5.13	102	6	-	0 - 20	QC02197
MSD	Toluene (mg/Kg)	0.06	1	0.1	5.98	118	8	-	0 - 20	QC02197
MSD	Ethylbenzene (mg/Kg)	<0.05	1	0.1	5.90	118	8	-	0 - 20	QC02197
MSD	M,P,O-Xylene (mg/Kg)	0.682	1	0.3	16.60	109	0	-	0 - 20	QC02197
Standard	Surrogate	Result	Dil.	Spike Amount	Analyst	% Rec.		% Rec. Limit	Prep Batch #	QC Batch #
MSD	TFT (mg/Kg)	5.63	1	0.1	RC	113		72 - 128	PB01803	QC02197
MSD	4-BFB (mg/Kg)	5.51	1	0.1	RC	110		72 - 128	PB01803	QC02197

Report Date: 4/28/00  
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N/A

### Quality Control Report Lab Control Spikes and Duplicate Spike

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS MTBE (mg/Kg)	<0.05	50	0.1	4.48	90		80 - 120	-	QC02197
LCS Benzene (mg/Kg)	<0.05	50	0.1	4.94	99		80 - 120	-	QC02197
LCS Toluene (mg/Kg)	<0.05	50	0.1	5.74	114		80 - 120	-	QC02197
LCS Ethylbenzene (mg/Kg)	<0.05	50	0.1	5.72	114		80 - 120	-	QC02197
LCS M,P,O-Xylene (mg/Kg)	0.072	50	0.3	16.4	109		80 - 120	-	QC02197
Standard Surrogate		Dil.	Spike Amount	Result	% Rec.		% Rec. Limit		QC Batch #
LCS TTF (mg/Kg)		50	0.1	0	0		72 - 128		QC02197
LCS 4-BFB (mg/Kg)		50	0.1	7.93	159		72 - 128		QC02197
LCS MTBE (mg/Kg)	<0.05	50	0.1	4.69	94	8	-	0 - 20	QC02197
LCS Benzene (mg/Kg)	<0.05	50	0.1	5.13	102	6	-	0 - 20	QC02197
LCS Toluene (mg/Kg)	<0.05	50	0.1	5.98	118	8	-	0 - 20	QC02197
LCS Ethylbenzene (mg/Kg)	<0.05	50	0.1	5.90	118	8	-	0 - 20	QC02197
LCS M,P,O-Xylene (mg/Kg)	0.072	50	0.3	16.60	109	0	-	0 - 20	QC02197
Standard Surrogate		Dil.	Spike Amount	Result	% Rec.		% Rec. Limit		QC Batch #
LCS TTF (mg/Kg)		50	0.1	6.89	138		72 - 128		QC02197
LCS 4-BFB (mg/Kg)		50	0.1	6.61	132		72 - 128		QC02197

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS DRO (mg/Kg)	<50	1	250	206	82		70 - 130	-	QC02307
LCS DRO (mg/Kg)	<50	1	250	204	82	1	-	0 - 20	QC02307

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS DRO (mg/Kg)	<50	1	250	183	73		70 - 130	-	QC02308
LCS DRO (mg/Kg)	<50	1	250	221	88	19	-	0 - 20	QC02308

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS GRO (mg/Kg)	<5	1	1	0.899	90		80 - 120	-	QC02198
LCS GRO (mg/Kg)	<5	1	1	1.06	106	16	-	0 - 20	QC02198

Report Date: 4/28/00  
1370Order ID Number: A00041503  
C.J. Saunders - TexacoPage Number: 8 of 8  
N/A

### Quality Control Report Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	MTBE (mg/Kg)		0.1	0.1	100	80 - 120	4/18/00	QC02197
ICV	Benzene (mg/Kg)		0.1	0.098	98	80 - 120	4/18/00	QC02197
ICV	Toluene (mg/Kg)		0.1	0.101	101	80 - 120	4/18/00	QC02197
ICV	Ethylbenzene (mg/Kg)		0.1	0.108	108	80 - 120	4/18/00	QC02197
ICV	M,P,O-Xylene (mg/Kg)		0.3	0.328	109	80 - 120	4/18/00	QC02197
CCV 1	MTBE (mg/Kg)		0.1	0.1	100	80 - 120	4/18/00	QC02197
CCV 1	Benzene (mg/Kg)		0.1	0.083	83	80 - 120	4/18/00	QC02197
CCV 1	Toluene (mg/Kg)		0.1	0.08	80	80 - 120	4/18/00	QC02197
CCV 1	Ethylbenzene (mg/Kg)		0.1	0.081	81	80 - 120	4/18/00	QC02197
CCV 1	M,P,O-Xylene (mg/Kg)		0.3	0.242	81	80 - 120	4/18/00	QC02197
CCV 2	MTBE (mg/Kg)		0.1	0.088	88	80 - 120	4/18/00	QC02197
CCV 2	Benzene (mg/Kg)		0.1	0.093	93	80 - 120	4/18/00	QC02197
CCV 2	Toluene (mg/Kg)		0.1	0.092	92	80 - 120	4/18/00	QC02197
CCV 2	Ethylbenzene (mg/Kg)		0.1	0.088	88	80 - 120	4/18/00	QC02197
CCV 2	M,P,O-Xylene (mg/Kg)		0.3	0.268	89	80 - 120	4/18/00	QC02197

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	DRO (mg/Kg)		250	255	102	70 - 130	4/25/00	QC02307
CCV 1	DRO (mg/Kg)		250	240	96	70 - 130	4/25/00	QC02307
CCV 2	DRO (mg/Kg)		250	278	111	70 - 130	4/25/00	QC02307

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	DRO (mg/Kg)		250	278	111	70 - 130	4/25/00	QC02308
CCV 1	DRO (mg/Kg)		250	312	125	70 - 130	4/25/00	QC02308

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	GRO (mg/Kg)		1	1.11	111	80 - 120	4/18/00	QC02198
CCV 1	GRO (mg/Kg)		1	1.18	118	80 - 120	4/18/00	QC02198
CCV 2	GRO (mg/Kg)		1	0.927	93	80 - 120	4/18/00	QC02198



6381 Aberdeen Avenue, Suite B Lubbock, Texas 79424 806•378•1296 806•794•1295 FAX 806•794•1298  
 4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•568•3443 915•585•3443 FAX 915•505•4944  
 E-Mail: lab@traceanalysis.com

**Analytical and Quality Control Report**

Mark Larson  
 Highlander Environmental Services  
 1910 N. Big Spring St.  
 Midland, TX 79705

Report Date: 5/4/00

Project Number: 1370  
 Project Name: C.J. Saunders - Texaco  
 Project Location: N/A

Order ID Number: A00041503

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
144570	Comp #4	Soil	4/13/00	9:55	4/15/00

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 3 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Report Date: 5/4/00  
1370Order ID Number: A00041503  
C.J. Saunders - TexacoPage Number: 2 of 3  
N/A**Analytical Results Report**Sample Number: 144570  
Description: Comp. #4

Param	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RPD
SPLP DRO (mg/L)									
SPLP DRO	<5	1	Mod 8015B	5/2/00	5/2/00	BP	PB02044	QC02435	50
SPLP GRO (mg/L)									
SPLP GRO	<5	1	8015	5/2/00	5/2/00	RC	PB02048	QC02433	0.1

**Quality Control Report  
Method Blanks**

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
SPLP DRO (mg/L)		<5	50	5/2/00	PB02044	QC02435

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
SPLP GRO (mg/L)		<5	0.1	5/2/00	PB02048	QC02433

**Quality Control Report  
Lab Control Spikes and Duplicate Spike**

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS SPLP DRO (mg/L)	<5	1	250	<50	10		70 - 130	-	QC02435
LCS D SPLP DRO (mg/L)	<5	1	250	<50	12	15	-	0 - 20	QC02435

Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS SPLP GRO (mg/L)	<5	1	1	0.84	84		80 - 120	-	QC02433
LCS D SPLP GRO (mg/L)	<5	1	1	0.988	99	13	-	0 - 20	QC02433

Report Date: 5/4/00  
1370Order ID Number: A00041503  
C.J. Saunders - TexacoPage Number: 3 of 3  
N/A

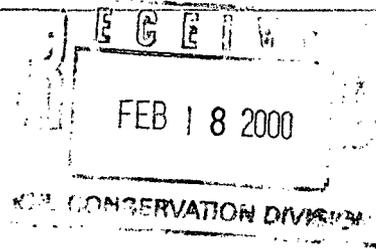
### Quality Control Report Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	SPLP DRO (mg/L)		250	270	108	70 - 130	5/2/00	QC02435
CCV 1	SPLP DRO (mg/L)		250	296	118	70 - 130	5/2/00	QC02435
Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	SPLP GRO (mg/L)		1	0.988	99	80 - 120	5/2/00	QC02433
CCV 1	SPLP GRO (mg/L)		1	1.13	113	80 - 120	5/2/00	QC02433



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191



Date: February 9, 2000

Mr. William C. Olson  
Hydrogeologist  
New Mexico Oil Conservation Division  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: Work Plan for Saunders Excavation Site:  
Unit Letter "J": Sec. 18, Township 19S, Range 37 E:

Dear Mr. Olson:

Eott Energy Pipeline Limited Partnership and Texaco Exploration and Production Inc. would like to submit the following work plan for the Saunders Excavation site.

The existing piles will be sampled to determine the extent of contamination. BTEX and TPH analysis will be conducted on each sample. The bottom of the excavation will be capped with a clay liner. Contaminated and non-contaminated soils will be blended to a maximum of 1000 TPH with 8015 modified analysis. Soils that will not blend down to this TPH level will be hauled to the Texaco landfarm and replaced with clean soil. Soil will be placed into the excavation and samples pulled throughout the backfill. Two monitor wells will be placed down stream of the center of the excavation, to the Southeast. The NMOCD will be provided a closure plan at the end of the project.

Eott Energy and Texaco would like to begin work immediately. We appreciate the cooperation of the NMOCD in this matter.

Sincerely:

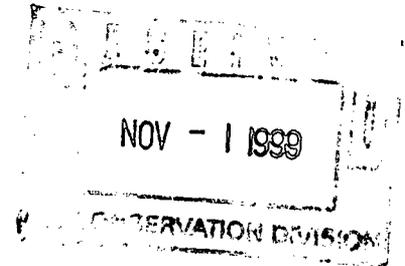
Eott Energy Pipeline Limited Partnership  
Lennah Frost

Texaco Exploration and Production Inc.  
Rodney Bailey



Date: October 28, 1999

William C. Olson  
Environmental Bureau  
Oil conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505



Re: TNM-95-10/Saunders Site  
Monument, New Mexico

Dear Mr. Olson:

The work plan submitted by Texaco on August 7, 1995 and approved by you on August 16, 1995 has been completed except for removal or blending of contaminated soil. The old pit site was removed to a depth of 36 ft. below surface. At this point contamination was still above NMOCD Guidelines because of close proximity to groundwater. Research & Development in Port Arthur Texas conducted finger printing of the oil and the results showed the area contained fresh oil, not weathered oil as in an old pit. The Port Arthur results matched the pipeline oil sample. Also it was stated that chlorides were not found in the sample. Tex-New Mex Pipeline, at this time, agreed to take over cleanup of the remainder of contamination, including soil and ground water. Note; e-mails dated December 7, 1995 and January 9, 1996. This was agreed upon by TNMPLC representatives Eddie Gripp and Johnny Chapman.

Texaco agreed in mid 1998, with TNMPLC representative Tony Savoy, that an estimated 30,000 yards of contaminated soil placed on the surface, removed from the old pit site, was our responsibility. But as of today TNMPLC or EOTT has combined all the contaminated soils on the surface. There are also additional piles of soil on site from TNMPLC 1998 excavations. It is impossible now to determine which contaminated soil belongs to which company.

Attached are the e-mails describing the day to day activity on the pit excavation and meetings between TNMPLC and Texaco. I have also attached the finger printing results. Texaco does not have an explanation of the results from Port Author. It was sent to TNMPLC. Also attached is a map showing location of old pit area in relation to the excavation.

Texaco is willing to meet with EOTT and the NMOCD on determining ways to reach closure on this site. If additional information is needed, please call me at 505-397-0422.

Sincerely

A handwritten signature in cursive script that reads "Rodney Bailey".

Rodney Bailey  
Texaco, Hobbs New Mexico

Xc: Chris Williams, OCD Hobbs District office

**Lehman, Larry M**

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**From:** Gallaher, Don L.  
**To:** Carriger, Doug K.  
**Cc:** Frazier, Terry L; Lehman, Larry M; Browning, Robert W; Johnson, E L (Bill)  
**Subject:** FW: SAUNDERS PIT MEETING  
**Date:** Tuesday, January 09, 1996 7:44AM  
**Priority:** High

FYI. The Hobbs OU has done a fine job providing a very convincing case.

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**From:** Browning, Robert W  
**To:** Gallaher, Don L.  
**Subject:** SAUNDERS PIT MEETING  
**Date:** Tuesday, January 09, 1996 8:05AM  
**Priority:** High

The meeting with Texas-New Mexico Pipeline Company concerning the Sanders Pit went well. The meeting was held at the TNMPLC office in Eunice, New Mexico on 1/8/96 at 3:00 pm (MST). It was attended by myself, Larry Hall, Larry Lehman, Wayne Minchew (Hobbs OU), Aaron Dobbs (Hobbs OU), Johnny Chapman (TNMPLC - Eunice), Eddie Gripp (TNMPLC - San Angelo), Tony Savoy (TNMPLC - Eunice) and Marc Oler (TTTI - Denver).

It was decided yesterday that TNMPLC would proceed with the cleanup of the pit/spill site as the responsible party. Two main points that were discussed were the fact that "finger printing" of the oil done by Port Arthur indicated that the oil was fresh (not weathered pit oil) and matched up with a sample of pipeline oil. The other main point was the fact that there was a lack of chlorides noted in any of the soil or water samples. This was important in that if the source were from the old pit area, there would have been a significant amount of chlorides noted since the contents of the pit would have included large amounts of produced water. Also discussed was the fact that none of the upgradient monitor wells TEPI drilled (between the pit and our old tank battery) showed any presence of hydrocarbon in the soils or water.

Mr. Gripp agreed with the data very quickly. Mr. Chapman never did understand this, therefore, I don't think he was ever fully convinced. However, Marc Oler agreed that he saw this as a TNMPLC problem and not a TEPI one and a decision was made to proceed at their own cost with the remediation of the site.

It was agreed that TNMPLC would keep TEPI informed of their progress. It was suggested that Mr. Lehman would be the point of contact for them. We made some recommendations as to how we thought they should proceed and these were well taken. I offered to be of any assistance necessary to Marc. He said that would be great and he would get ahold of me if the need arose.

All in all, the meeting was very positive and went well.

## Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, December 21, 1995 7:09AM

12-20-95 Tex-Mex drilled inside pit area next to thier deep hole north lip Appx. 2-3' from lip running from east to west. They drilled with track drill 2 holes in east wall, 1 @30 deg. 18' into wall , it was faryl clean , could smell oil. 1 @ 45 deg.18' into water, it showed oil. 5 holes along north edge of hole. All had different levels of contamination , from smell to visable oil. They started a series of holes 15' north form east to west. I did not stay, but Allen Hodge was there to witness & help catch samples. ESC will run TPH's . Johnny Chapman said he wanted to retain all samples. He also said they would not make any decisions on what they were going to do until after the first of the year. He said he would contact us & set up a meeting then to let us know thier intentions.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, December 20, 1995 6:58AM

12-8, 9,11,12-95 Started drilling monitor wells on north side of pit. Drilled 2 wells on west side of Tex-Mex well. All wells drilled to a depth of 60', all showed clean to bottom.

12-13,14-95 shut dsown all hands have flu . Talked to J. Chapman w/ Tex-Mex , Rice needs 4" poly to loop 6" line on east side of exc. Johnny said they would furnish this ( 700")

12-15-95 Drilled 3 rd well on west side, it showed clean to bottom.

12-16-95 Drilled 4 th well west, showed clean.

12-17-95 Work on clutch on drill rig.

12-19-95 Rice & Tex-Mex looped 6" on east side of pit. ESC drilled 5th well. It is located on east side of tex-mex well. Drilled to 65', it showed clean to bottom.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, December 12, 1995 2:24PM

12-8&9-95 Drilled monitor well south of tanks in Ameradas battery to 60' clean from top to bottom.  
12-11-95 Rig broke clutch. Moved Amerada's fio line from eastside of excavation to outside of fence. Called Jimmy Cooper & notified him.  
12-12-95 Drilled monitor well 40' west of above. Drilled 60' TD. Clean from top to bottom.  
Rice Eng. will be out tomorrow or next day to pull up 6" transite line running 50' on east side of exc.  
Rice picked up the transite we took up from west line. Wes w/ ESC wants to wait to drill monitor well on east side of excavation till they get through to check for possible source.

**Lehman, Larry M**

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**From:** Minchew, P Wayne  
**To:** Frazier, Terry L  
**Cc:** Dobbs, Aaron D; Lehman, Larry M; Pool, Russell S  
**Subject:** Saunders Pit  
**Date:** Thursday, December 07, 1995 6:58AM

A meeting was held Wednesday, Dec. 6, 1995 at 9:00 A.M. at the Bender office.

Present : J. Chapman - Tex N. Mex Pipeline  
          T. Savoie - " " " "  
          A. Hodges - Environmental Spill Control  
          W. Root - " " " "  
          L. Lehman - Texaco E & P  
          A. Dobbs - " " " "  
          W. Minchew - " " " "

Cost to date for Texaco E & P - \$223,000

Old pit area is cleaned to top of limestone layer (second shelf). This material is still above OCD allowable as it is close to the fresh water. We will drill three holes in this hard layer to determine depth of contamination and then grout the holes closed. This cost will be ours.

Contamination is still present in the east and south walls of the pit. This has been determined to be part of the pipeline leak and they will take over cleanup and cost of the remainder of the contamination.

After contamination is removed we will meet again to work on closure proposal for the OCD. Closure should be no problem but the water issue will probably be a shared responsibility between Texaco and Pipeline. We remain involved in the water issue because of the depth of our pit contamination and its proximity to the fresh water. If the borings show no penetration into the limestone we may be able to change the shared responsibility of the water issue. Closure cost will be a shared cost.

## Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, December 07, 1995 11:46AM

12-4-95 West wall cleaned up Saturday the 2nd. Pushed all material that was stockpiled in bottom of pit out to the southwest. Cleaned up bottom & pushed out to southwest.

Called Tex-Mex, ESC, & MS mail all TEPI personnel concerned. See MS mail to this effect.

Also see Wayne's ms mail on results of this meeting.

12-6-95 ESC drilled holes. Results are pending test, but here is what we found.

1st hole: 15' inside north wall. Drilled to 9' hit water with free oil on top. drilled to depth of 12' total.

2nd hole: west side of southwest ramp @ base of ramp. Drilled to depth of 12-15' hole clean.

3rd hole: east side base of northeast ramp. Same depth free oil.

4th hole: up ramp Drilled @ 45 degree angle, east. Hit water estimated at 10' outside vertical wall at the same depth, 9'. Free oil.

5th hole: Middle triangulation of first 3 holes. Same depth, free oil.

Called Wayne Minchew, Johnny Chapman w/ Tex-Mex. All agreed to grout all holes. Get test results , reconvene & discuss.

Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunder Pit  
**Date:** Saturday, November 18, 1995 5:50PM

11-15-95 Continued to excavate west wall & push out to the southwest.

11-16-95 a larger pocket of contamination was uncovered on the south end of the narrow strip on west wall .  
appx. 15' x 8' . Continued to excavate & push out to southwest.

11-17-95 Continued on stain on south end of west wall. Stoney said it looked tobe about 1/2 gone. Pushed North  
wall straight south into pit & prepared to push out to southwest. This material will be used for dilution.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, November 15, 1995 7:01AM

11-13-95 1st report since last Tuesday the 7th. Excavating west wall, strip of fraced sandstone 1' x 25' long & another 3' wide X depth of sand between sandstone & limestone appx 8'.

Moving poly lines & fence on north side so we can excavate north wall. Contacted Jimmy Cooper.

11-14-95 Continued excavating west wall w/ trachoe & pushing out to southwest.

Started excavating north wall pushing all out straight west. Appx. 6' form monitor well on north side. Appx. 8' deep.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, November 07, 1995 1:13PM

11-6 & 7-95 Started moving spoor on west of excavation on farther to the west to stay in compliance with excavation plan. We should have enough moved to start excavating with trackhammer the afternoon of the 7th.

**Lehman, Larry M**

**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, November 03, 1995 11:33AM

11-2-95 Continue to excavate north & west wall between sandston layer & limestone.  
Still some clean strips showing up now & then.

11-3-95 Same as above.

Estimated cost as of 10-31-95 is \$163,776.51.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, November 01, 1995 2:11PM

10-31-95 Continued to excavate. Dark contamination thinning out.

11-1-95 Continued to excavate. All of dark contamination gone. Still excavating contaminated sand, some pink strips now & then. Sandstone layer getting thinner & more broken.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, October 27, 1995 3:25PM

10-26-95 Continue to excavate sandstone ledge. Excavated appx. 15' farther north. We are seeing some clean looking pink streaks of sand now & then.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, October 26, 1995 2:54PM

10-26-95 Cat fixed. Continued to excavate south lip of sandstone ledge & push out of pit to the S.W. No excavating on plug today.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, October 25, 1995 2:38PM

10-24 & 25-95 Cat broke down. Continued to excavate plug with jackhammer & trackhoe.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, October 24, 1995 8:42AM

10-21-95 & 10-23-95 Moved off NW corner. Still some staining, don't know what it test.  
Moved to south lip & started breaking sandstone & excavating sandy layer. Appx. size of area 30 x 60. Started back excavating plug with trackhoe.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Monday, October 23, 1995 7:47AM

10-20-95 Big trackhoe w/ jackhammer arrived late yesterday. Excavate N.W. corner pocket. Dig out w/ trackhoe & push out of hole w/ cat. Big hammer working great.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, October 20, 1995 7:27AM

10-19-95 Jackhammer broke. Moving dirt w/ cat & trackhoe. Big hammer should be here today.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, October 19, 1995 9:10AM

10-18-95 Still going slow. Gave up on sandstone & moved to N.W. wall to excavate pocket.



Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, October 18, 1995 8:15AM

10-17-95 Equipment arrived & started breaking sandstone layer. Going to go slow, jackhammer & trackhoe are not big enough. Allen Hodge w/ ESC said these were not what he ordered & we would not have to pay for them. The rental company is sending the right ones.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, October 17, 1995 8:22AM

10-16-95 Waiting on equipment.

**Lehman, Larry M**

---

**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, October 13, 1995 3:25PM

Waiting on equipment.

**Lehman, Larry M**

---

**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Monday, October 09, 1995 7:23AM

10-6-95

ESC received verbal permission for Bill Olson w/ NMOCD to start monitor wells in & around pit. ESC rigged up & drilled 1st monitor well appx. 25' from south edge of pit to a depth of 58'. All samples showed clean while drilling.

10-7-95

Moved rig inside of excavation down ramp to appx. 18' north of sandstone ledge to drill east hole. Drilled through 2' of sandstone and 6' of sand & hit limestone for a total depth of 8'. The 6' section of sand was saturated with hydrocarbon from top to bottom.

Started moving rig to middle hole & broke down. Shut down till repairs are made.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, October 05, 1995 4:19PM

Wes Root W/ESC gave copy of work plan & cost for subsurface investigation fo pit & leak sight. Faxed copy to Wayne Minchew & he okayed it on phone. Talked to Tony Savioe W/ Tex-Mex, he approved also. We'll start as soon as we recieve NMOCD approval.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, October 04, 1995 10:52AM

10-3-95

ESC cleaning out bottom of pit. Still slick when pushing up ramp to west.

10-4-95

ESC cleaning out bottom. Pushed up pile & waiting to dry. Will push out to west this evening.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, October 03, 1995 8:13AM

Tried to send this yesterday evening from Jal, server was messed up.  
10-2-95 Bottom of pit looks dry enough to clean out. Called ESC they will start cleaning out Tuesday the 3rd to prepare for boaring through sandstone layer.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, September 28, 1995 4:54PM

Pit bottom still to wet to work, this evenings rain ain't gonna help.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, September 27, 1995 7:27AM

9-26-95 No action at pit. Set up meeting w/ Tex-Mex, ESC, & Texaco to discuss futher action & agree on amounts pumped out of pit & to the field.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, September 22, 1995 7:32AM

Had trouble priming pumps in pit. Got all running @ 12:00 noon. Talked to J. Chapman W/ Tex-Mex , Wes Root W/ ESC, all decided to run 24 hrs. to get water out of pit. ESC will be on location to pull sample as discussed in meeting. Tex-Mex will have 2 men on location to check pumps. Called for light plant & lights, Tex-Mex & ESC will watch pit & 210 for sheen while monitoring pumps & irrigation system. Pumping appx. 500BPH to irrigation system. Lowered pit as of 5:00 pm appx. 2'. Jimmy Cooper came by several times.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, September 21, 1995 7:11AM

Finally rigged up 1 pump in pit & finished up with irrigation lines. Started pumping to tank @ 4:00 PM. Started pumping to field lines @ 5:00 PM. Pumping appx. 250 BPH to field. Shut down @ 8:00 PM. Pumped appx. 8-10" out of pit. Will get good gauge on tank for output rate this am. Jimmy Cooper came by around 5:00, he said he would not be back in this part of the would till Monday or Tuesday.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, September 20, 1995 7:51AM

After meeting in Bender office.

Located 5 X 6 centrifugal pump @ ABC, pmp 18 BPM. Had it delivered to location. Took delivery & set 210 bbl. FG tank form Palmer of Texas. Tex-Mex got their pump going & loaded tank. We'll plumb pump to tank & build irrigation lines today & start pumping. Tex-Mex built new walls around north end of pit, but they are not tall enough to keep water out of pit if it rains as hard as it has this last week (appx. 5' tall). Jimmy Cooper came by & visited.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, September 19, 1995 7:04AM

Went by around 11:30 am yesterday the 18th pit had water about 12' from the top. The water level had fell about 2' from the original level from Fridays rain. There was a small skim of oil against the north wall appx. 1 1/2 foot X 5 foot.

Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, September 15, 1995 8:45AM

SHUT DOWN FOR RAIN! Meeting w/ M. Frazier @ 12:00 noon.

Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, September 14, 1995 4:06PM

Working on west wall pushing up clean caliche for reduction material & cleaning bottom of pit.

## Lehman, Larry M

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Wednesday, September 13, 1995 7:07PM

9-13--95 Continued working on northwest wall. Larry Lehman, Allen Hodge, & Eddie Slavens think that the contamination may have come from the Tex-Mex leak. Cleared north wall back appx. 15' X 40' down to the hard layer of broken sandstone. Allen took pictures for documentation showing the stain and its migration toward the southeast.

This layer of sandstone is contaminated and will have to be excavated. Larry has set up a meeting with Mr. Frazier for Friday @ 12:00 noon to discuss further action.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, September 12, 1995 3:32PM

9-11-95 Shut down to wet.

9-12-95 Working on stain & seep on north wall. Looks like it may have came from Tex-Mex leak. Seeped to this shelf & migrated to the southeast. Going to have to get jack hammer (?) or something to work on this rock, can't touch it with cat. I called John paul Smith w/ Tex-Mex let him know thier hole has water up to the first shelf. He said he would send out a vacuum truck tomarrow to empty.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Friday, September 08, 1995 2:22PM

Rained, Shut down till Monday. There is a small puddle of oil forming in bottom of excavation, may be leeching up from under sandstone. Will get clean & evaluate.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M; Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, September 07, 1995 3:14PM

9-6-95 Track-hoe cut 6-8' out of south wall of plug. Bottom 8' shows slight contamination. Cat moving spoor out same as before to southwest. Getting colse to sanstone layer.

9-7-95 Track-hoe working on bottom 8' of plug, (cleaning up good.) Cat cleaning out bottom on sandstone layer. Will clean to sandstone & evaluate from there.

Jimmy Cooper came by to visit. WAYNE, he said he needed to visit with you.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:05AM

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From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: Saunders Pit  
Date: Friday, September 01, 1995 3:12PM

8-30-95 Track-hoe started working on plug & big rocks in bottom of excavation.

8-31-95 Track-hoe cut observation ditch just inside of fence on north side running east & west. Dug to 11' with no contamination, need to dig to appx. 17' to be sure. Track-hoe continued on plug & Cat moving spoor to the southwest out of excavation.

9-1-95 Track-hoe & Cat continued same. All will be back, Tuesday the 5th

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:05AM

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From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: Saunders Pit  
Date: Tuesday, August 29, 1995 2:33PM

ESC continued excavation with Cat. They will bring out trackhoe this evening to start on plug.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

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From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: Saunders Pit  
Date: Monday, August 28, 1995 3:36PM

Cat broken down, waiting on mechanic. Got it fixed continued with excavation. Will cut evaluation ditch with backhoe Tuesday or Wednesday.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

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From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: Saunders Pit  
Date: Friday, August 25, 1995 3:34PM

8-24-95 North end of excavation 20' X 20" hard sandstone, from 15' to bottom of hole. Stoney's working on it, pushing some dirt into Tex-Mex excavation, then back out west & south.

8-25-95 Got it! Moved 2 big hunks of sandstone out of pit to north east of Tex-Mex. Continued ripping & excavating. Still real hard.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

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From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: Saunders Pit  
Date: Wednesday, August 23, 1995 3:03PM

ESC still ripping on hard caliche & sandstone. Appx. 20' deep.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

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**From:** Dobbs, Aaron D  
**To:** Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Tuesday, August 22, 1995 3:48PM

ESC continued, excavation same depth but moving contaminated dirt by Tex-mex, leaving the proposed plug that is to be moved by trackhoe smaller. Started ripping caliche & sandstone north side of old pit. REAL HARD!

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

-----  
**From:** Dobbs, Aaron D  
**To:** Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Monday, August 21, 1995 3:05PM

8-18-95 ESC excavation continued to 10'-12' appx. loose top soil & clay mixture.  
SDFWE.

8-24-95 ESC continued excavation down to 15'-18' , caliche & sandstone mix.  
Getting harder.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

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**From:** Dobbs, Aaron D  
**To:** Minchew, P Wayne  
**Subject:** Saunders Pit  
**Date:** Thursday, August 17, 1995 3:54PM

Callaway stabilized all of transite pipe( appx. 22 jts. or pieces & 1 poly pack drum). All of this material is stacked on poly sheeting , fenced off & notice of asbestos material attached to fencing. All material is located north east of Tex-Mex original excavation inside of compound.  
ESC continued with excavation.

**Lehman, Larry M**

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**From:** Dobbs, Aaron D  
**To:** Lehman, Larry M  
**Subject:** FW: C.J. Saunders Pit  
**Date:** Friday, September 08, 1995 8:06AM

-----  
From: Dobbs, Aaron D  
To: Minchew, P Wayne  
Subject: C.J. Saunders Pit  
Date: Wednesday, August 16, 1995 4:36PM

8-15-95 Moved west fence 150' to west need room for excavation. Moved Amerada Hess flowline well # 2-14. TNMPICo moved their line outside of compound. Rice moved their line outside fo compound. ESC was not on location.

8-16-95 Wrote CST to ESC for starting excavtion, shut them down because of Rice transite pipe. Called Larry Lehman,he recommended Callaway Safety to stabilize asbestos. Called out backhoe to strip out line. Callaway is stripping line this evening & putting broken pieces & collars in poly pack drums for storage. Callaway will stabilize pipe tomorrow.



making the future happen

FAX TRANSMITTAL FORM

MAKE COPY -

FOR Lacey Lehman

TEXACO INC.  
RESEARCH & DEVELOPMENT DEPARTMENT

P.O. BOX 1608  
PORT ARTHUR, TX 77641  
FAX (409)989-2827  
CONFIRMATION: (409)989-2391  
TEXNET: 8-989-2391

DATE: 1-8-96

COVER + 7

MESSAGE TO: Tony Savoie or Ben Thompson FAX NO: 505-395-2636  
Texas-New Mexico Pipeline Company  
Jal, New Mexico

394-2591

MESSAGE FROM: Jeff Wright  
Texaco Fuels & Lubricants

TIME TRANSMITTED \_\_\_\_\_

SUBJECT: Spill Samples TNM10

COMMENTS: Additional Plots

received your telephone call. will try to call you.

Please provide a telephone number where I may  
reach you. (Tony Savoie or Ben Thompson)

Jeff Wright

409-989-2876

" - " - 2593

11:57:18 1/08/1996

12-13-95 Crude Pipeline Sample

12-13-95 INM 10

6-20-95 MNW 10

mVolts

Detector Response

Elution Time

IS1683

IS1681

IS1685

10

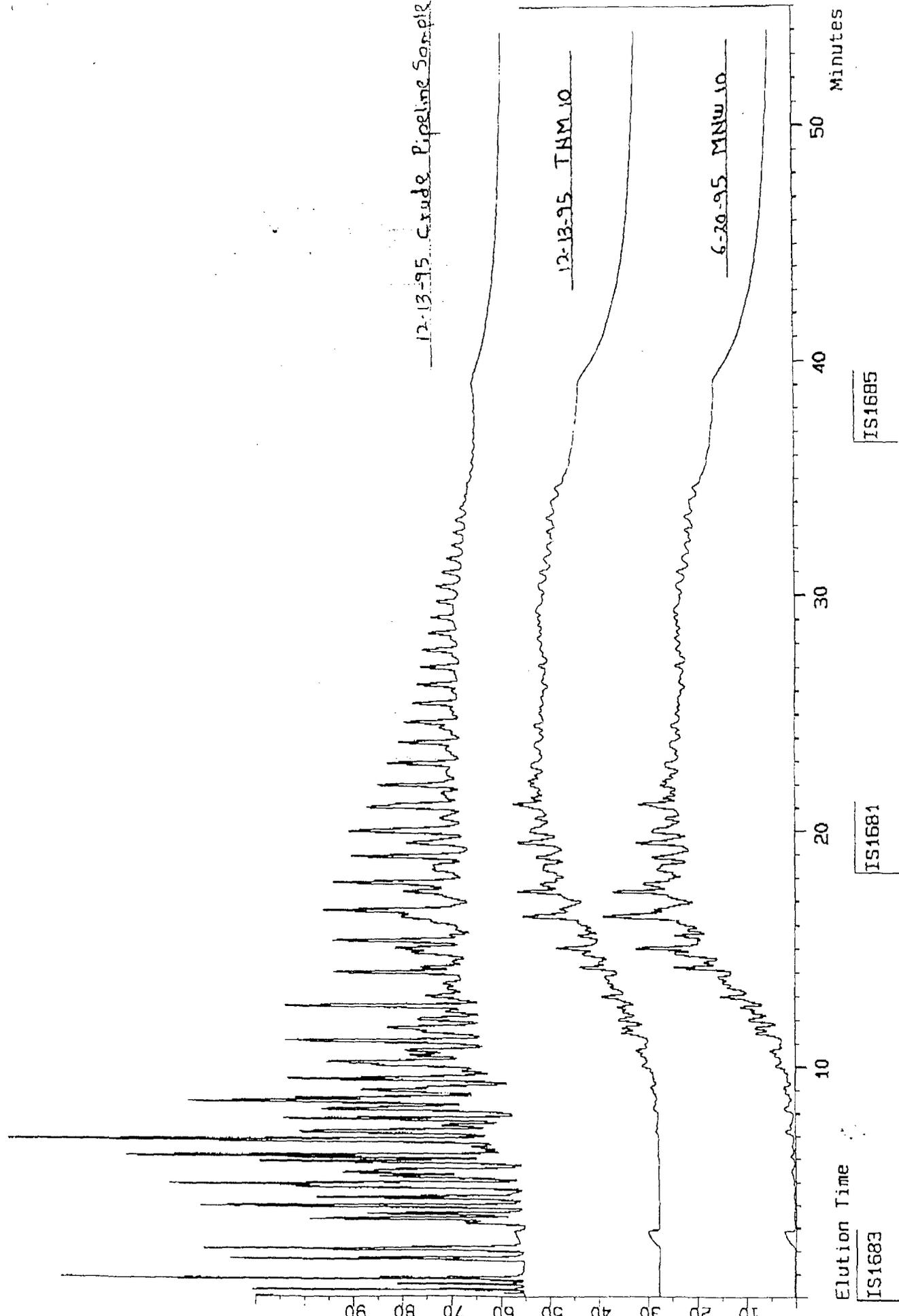
20

30

40

50

Minutes



UNRESOLVED CRUDE/RESIDUAL SD ANALYSIS

Acquisition Information: 6-20-95 TNM10  
 Chromatogram IS1683 701-95-0001-023 JCW  
 AC Method 91 Instrument 402 Vial 0

14:04:58 1/05/1996  
 Acq. by Sheryl Choate

Analysis Information:  
 AN Method: SD0083 701-95-0001-023 JCW

15:00:53 1/05/1996

Analysis method has not been modified

Analyst: Sheryl Choate Channel 0

Interpolation Mode 4; Blank IS1679; I.S. File IS1682/0

Standard/Sample Weight Ratio 0.0980; Standard Sample Density Ratio 1.0000

% Off	Time M	NBP C	NBP F	IBP	% Off	Time M	NPB C	NPB F
0.5	9.02	143.5	290.3		1.0	10.00	166.0	330.7
2.0	12.06	187.3	369.2		3.0	12.02	199.8	391.6
4.0	13.50	207.6	405.7		5.0	14.00	214.2	417.6
6.0	14.39	219.9	427.7		7.0	14.07	225.4	437.8
8.0	15.05	229.5	445.1		9.0	15.00	234.3	453.8
10.0	15.72	239.3	462.7		11.0	16.05	244.2	471.6
12.0	16.32	248.2	478.7		13.0	16.02	251.2	484.1
14.0	16.79	255.1	491.1		15.0	17.00	259.8	499.7
16.0	17.36	263.7	506.7		17.0	17.00	267.2	513.0
18.0	17.83	270.9	519.6		19.0	18.00	274.8	526.7
20.0	18.39	278.6	533.4		21.0	18.00	282.3	540.1
22.0	18.94	286.1	546.9		23.0	19.00	290.5	554.8
24.0	19.52	294.4	561.9		25.0	19.00	298.4	569.1
26.0	20.06	302.3	576.1		27.0	20.00	306.2	583.1
28.0	20.62	310.2	590.4		29.0	20.00	314.5	598.1
30.0	21.17	318.1	604.6		31.0	21.43	322.0	611.6
32.0	21.72	326.1	619.0		33.0	22.00	330.2	626.4
34.0	22.27	334.1	633.4		35.0	22.00	338.3	640.9
36.0	22.84	342.5	648.4		37.0	23.00	346.5	655.7
38.0	23.42	350.7	663.2		39.0	23.00	354.8	670.6
40.0	24.00	358.9	678.0		41.0	24.30	363.1	685.6
42.0	24.59	367.3	693.1		43.0	24.00	371.5	700.7
44.0	25.19	375.8	708.4		45.0	25.00	380.1	716.1
46.0	25.80	384.3	723.8		47.0	26.00	388.7	731.7
48.0	26.42	393.1	739.6		49.0	26.00	397.5	747.5
50.0	27.04	401.9	755.4		51.0	27.00	406.2	763.2
52.0	27.65	410.7	771.2		53.0	27.00	414.9	778.8
54.0	28.25	419.2	786.5		55.0	28.00	423.4	794.2
56.0	28.86	427.7	801.9		57.0	29.00	431.9	809.4
58.0	29.45	436.1	817.0		59.0	29.00	440.4	824.7
60.0	30.05	444.8	832.6		61.0	30.00	449.2	840.5
62.0	30.66	453.5	848.3		63.0	30.00	458.0	856.4
64.0	31.30	462.6	864.6		65.0	31.00	467.1	872.8
66.0	31.95	472.2	881.9		67.0	32.00	477.2	890.9
68.0	32.61	482.4	900.3		69.0	32.00	487.5	909.5
70.0	33.29	492.8	919.0		71.0	33.00	497.4	927.4
72.0	33.97	501.4	934.5		73.0	34.00	505.4	941.7
74.0	34.68	509.5	949.1		75.0	35.00	513.8	956.9
76.0	35.45	518.4	965.1		77.0	35.00	523.1	973.6
78.0	36.29	528.0	982.4		79.0	36.00	533.0	991.4
79.9	37.15	537.8	1000.0	FEP	100.0		42130.719	Mv*Sec

12: 11: 19 1/08/1996

701-95-0001-023 JCM

6-20-95 THM 10

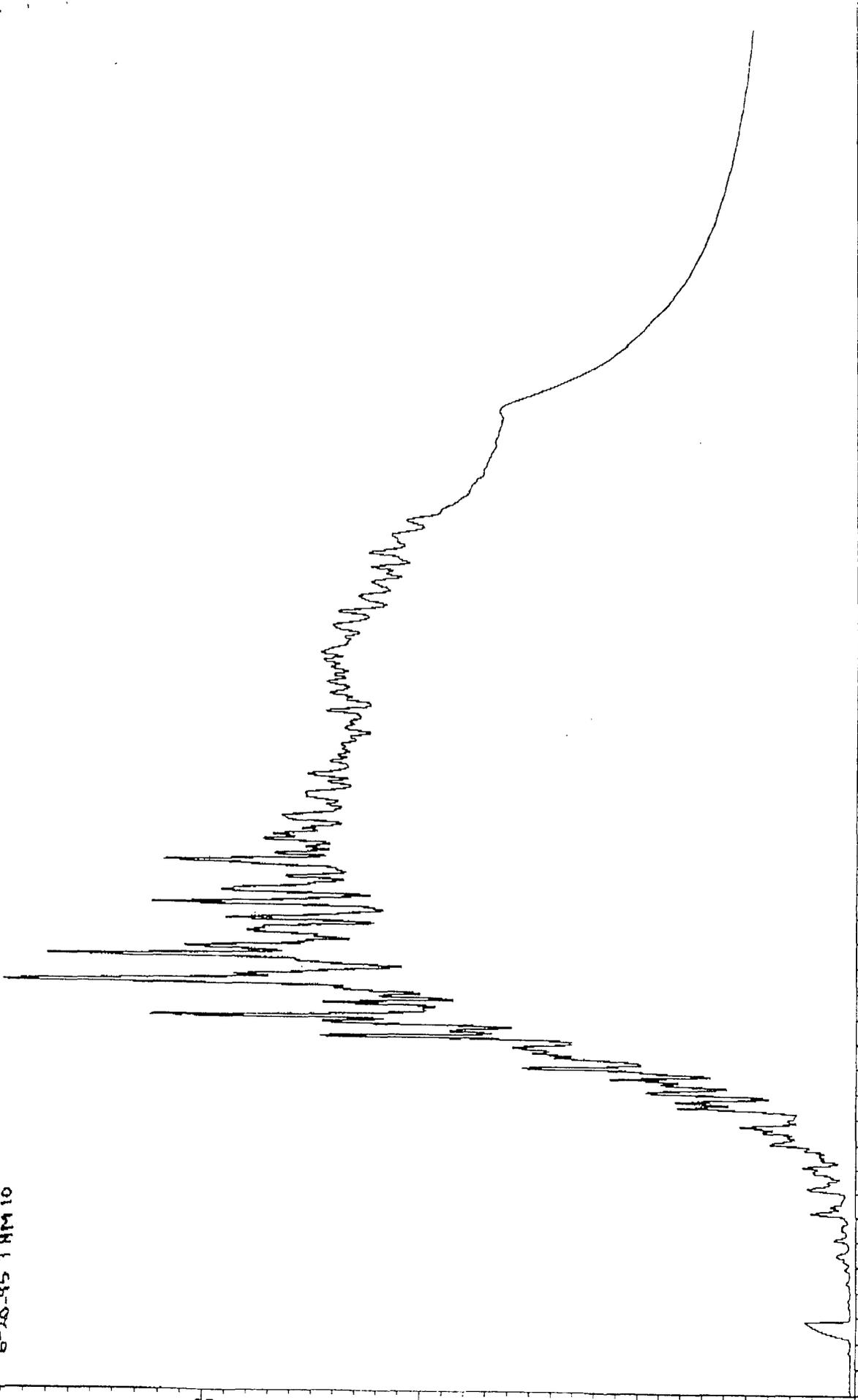
mVolts

30

20

10

Detector response



10

20

30

40

50

Elution Time

IS1683

Not analyzed yet

Minutes

Inject time: 14:04:58 1/05/1996

Vial: 0

Instrument: 402

UNRESOLVED CRUDE/RESIDUAL SD ANALYSIS

Acquisition Information: 12-13-95 TMM10

Chromatogram IS1681 701-95-0003-023 JCW  
 AC Method 91 Instrument 402 Vial 0

11:52:46 1/05/1996  
 Acq. by Sheryl Choate

Analysis Information:

AN Method: SD0083 701-95-0003-023 JCW

14:17:53 1/05/1996

Analysis method has not been modified

Analyst: Sheryl Choate Channel 0

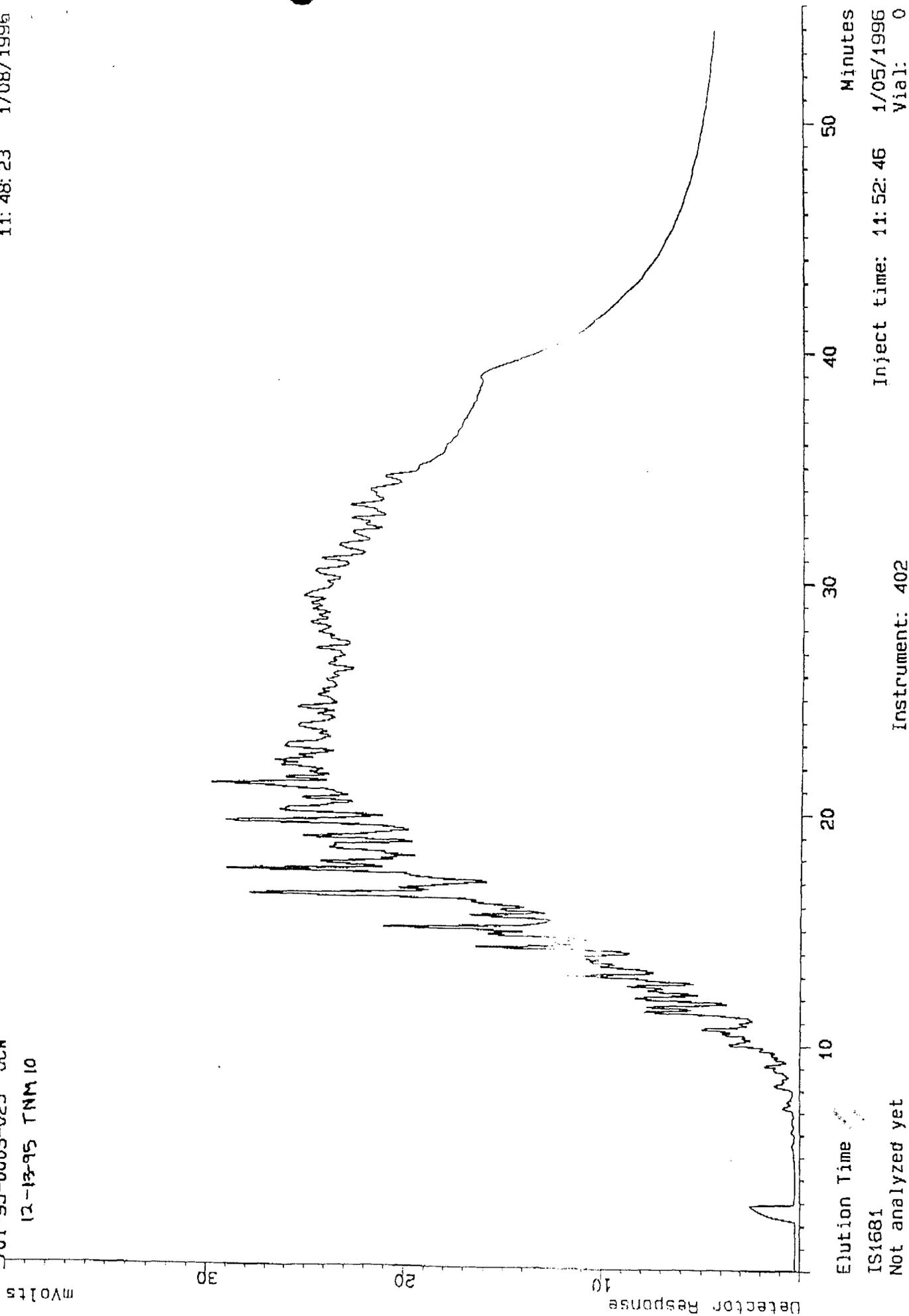
Interpolation Mode 4; Blank IS1679; I.S. File IS1680/0

Standard/Sample Weight Ratio 0.0984; Standard/Sample Density Ratio 1.0000

% Off	Time M	NBP C	NBP F		% Off	Time M	NBP C	NBP F
0.5	10.09	158.4	317.2	IBP	1.0	11.34	176.3	349.4
2.0	12.54	194.5	382.1		3.0	13.46	207.0	404.6
4.0	14.19	216.9	422.5		5.0	14.78	225.6	438.0
6.0	15.25	232.5	450.5		7.0	15.79	240.4	464.8
8.0	16.27	247.4	477.3		9.0	16.59	252.1	485.8
10.0	17.01	258.4	497.2		11.0	17.37	263.9	507.1
12.0	17.69	268.7	515.7		13.0	18.04	273.7	524.7
14.0	18.39	278.5	533.2		15.0	18.73	283.2	541.7
16.0	19.06	287.7	549.9		17.0	19.42	292.9	559.3
18.0	19.71	297.1	566.9		19.0	20.03	301.8	575.2
20.0	20.33	306.1	583.1		21.0	20.65	310.7	591.2
22.0	20.97	315.2	599.4		23.0	21.24	319.2	606.5
24.0	21.54	323.6	614.4		25.0	21.85	328.1	622.5
26.0	22.15	332.4	630.2		27.0	22.44	336.6	638.0
28.0	22.75	341.1	646.1		29.0	23.04	345.4	653.7
30.0	23.36	349.8	661.7		31.0	23.67	354.2	669.5
32.0	23.97	358.5	677.3		33.0	24.29	362.9	685.3
34.0	24.59	367.3	693.1		35.0	24.91	371.8	701.2
36.0	25.22	376.2	709.2		37.0	25.54	380.7	717.3
38.0	25.86	385.2	725.4		39.0	26.18	389.8	733.6
40.0	26.51	394.4	741.9		41.0	26.83	398.9	750.1
42.0	27.15	403.5	758.2		43.0	27.47	408.1	766.6
44.0	27.79	412.6	774.7		45.0	28.11	417.1	782.7
46.0	28.42	421.5	790.6		47.0	28.73	425.9	798.6
48.0	29.04	430.3	806.5		49.0	29.35	434.7	814.5
50.0	29.65	439.1	822.3		51.0	29.97	443.6	830.5
52.0	30.29	448.2	838.7		53.0	30.60	452.6	846.7
54.0	30.93	457.3	855.2		55.0	31.26	462.0	863.6
56.0	31.59	466.8	872.2		57.0	31.93	472.0	881.5
58.0	32.27	477.2	890.9		59.0	32.62	482.6	900.6
60.0	32.97	487.9	910.2		61.0	33.33	493.3	920.0
62.0	33.68	498.0	928.5		63.0	34.03	502.1	935.8
64.0	34.40	506.3	943.4		65.0	34.78	510.6	951.1
66.0	35.17	515.2	959.3		67.0	35.59	520.0	968.0
68.0	36.03	525.0	976.9		69.0	36.48	530.1	986.2
70.0	36.94	535.4	995.7	FBP				
70.4	37.15	537.8	1000.0	FEP	100.0		44671.180	Mv*Sec

11: 48: 23 1/08/1996

701-95-0003-023 JCW  
12-13-95 TNM 10



Elution Time  
 IS1681  
 Not analyzed yet

Instrument: 402

Inject time: 11:52:46  
 Vial: 0

Minutes  
 1/05/1996

UNRESOLVED CRUDE/RESIDUAL SD ANALYSIS

Acquisition Information: 12-13-95 Pipeline Crude  
 Chromatogram IS1685 701-95-0002-023 JCW  
 AC Method 91 Instrument 402 Vial 0

16:15:14 1/05/1996  
 Acq. by Sheryl Choate

Analysis Information:

AN Method: SD0083 701-95-0002-023 JCW

11:06:33 1/08/1996

Analysis Method revision number: 4

Analyst: Sheryl Choate Channel 0

Interpolation Mode 4; Blank IS1679; I.S. File IS1684/0

Standard/Sample Weight Ratio 0.0959; Standard/Sample Density Ratio 1.0000

% Off	Time M	NBP C	NBP F		% Off	Time M	NBP C	NBP F
0.5	0.74	11.6	53.0	IBP	1.0	0.79	12.4	54.3
2.0	1.66	27.6	81.6		3.0	2.09	35.0	95.0
4.0	3.37	57.3	135.2		5.0	3.89	66.2	151.2
6.0	4.05	68.9	156.0		7.0	4.74	75.9	168.7
8.0	4.89	77.4	171.3		9.0	5.17	80.3	176.5
10.0	5.43	82.9	181.2		11.0	5.85	87.2	188.9
12.0	6.07	89.3	192.8		13.0	6.16	90.3	194.5
14.0	6.72	96.0	204.8		15.0	6.80	96.8	206.2
16.0	7.06	102.0	215.6		17.0	7.23	108.1	226.7
18.0	7.69	124.8	256.7		19.0	8.10	131.0	267.8
20.0	8.32	134.0	273.1		21.0	8.50	136.4	277.6
22.0	8.65	138.5	281.3		23.0	8.95	142.7	288.8
24.0	9.39	148.6	299.4		25.0	9.58	151.3	304.3
26.0	10.06	158.0	316.4		27.0	10.26	160.8	321.5
28.0	10.62	166.1	330.9		29.0	11.03	171.8	341.3
30.0	11.30	175.8	348.4		31.0	11.65	181.0	357.9
32.0	12.05	187.2	368.9		33.0	12.52	194.2	381.5
34.0	12.74	197.3	387.2		35.0	13.19	203.4	398.1
36.0	13.64	209.5	409.1		37.0	14.01	214.4	418.0
38.0	14.36	219.4	426.9		39.0	14.81	226.0	438.9
40.0	15.12	230.6	447.1		41.0	15.39	234.5	454.2
42.0	15.88	241.8	467.2		43.0	16.28	247.6	477.7
44.0	16.55	251.5	484.7		45.0	16.81	255.4	491.7
46.0	17.29	262.7	504.9		47.0	17.63	267.9	514.2
48.0	17.86	271.2	520.2		49.0	18.32	277.6	531.6
50.0	18.74	283.3	542.0		51.0	19.01	287.1	548.7
52.0	19.49	294.0	561.1		53.0	19.90	299.9	571.9
54.0	20.13	303.2	577.8		55.0	20.59	309.8	589.6
56.0	21.00	315.7	600.2		57.0	21.27	319.5	607.2
58.0	21.72	326.1	619.0		59.0	22.06	331.1	628.1
60.0	22.51	337.7	639.9		61.0	22.92	343.6	650.5
62.0	23.34	349.6	661.3		63.0	23.78	355.8	672.5
64.0	24.20	361.8	683.2		65.0	24.64	367.9	694.3
66.0	25.07	374.0	705.2		67.0	25.51	380.3	716.5
68.0	26.00	387.1	728.9		69.0	26.42	393.2	739.7
70.0	26.94	400.6	753.0		71.0	27.40	407.0	764.7
72.0	27.84	413.3	775.9		73.0	28.35	420.5	789.0
74.0	28.82	427.2	800.9		75.0	29.28	433.7	812.7
76.0	29.78	440.8	825.5		77.0	30.29	448.2	838.8
78.0	30.80	455.4	851.8		79.0	31.34	463.1	865.6
80.0	31.90	471.4	880.5		81.0	32.49	480.5	896.9
82.0	33.11	490.0	914.0		83.0	33.74	498.7	929.7
84.0	34.40	506.3	943.4		85.0	35.13	514.7	958.4
86.0	35.94	524.0	975.2		87.0	36.83	534.1	993.4
87.4	37.15	537.8	1000.0	FEP	100.0			

38996.367 Mv\*Sec

Detector Response

mVolts

10 20 30 40 50 60 70 80 90 100

701-95-0002-023 JCM  
12-13-95 Pipeline Crude

11:57:53 1/08/1996

Elution Time

10

20

30

40

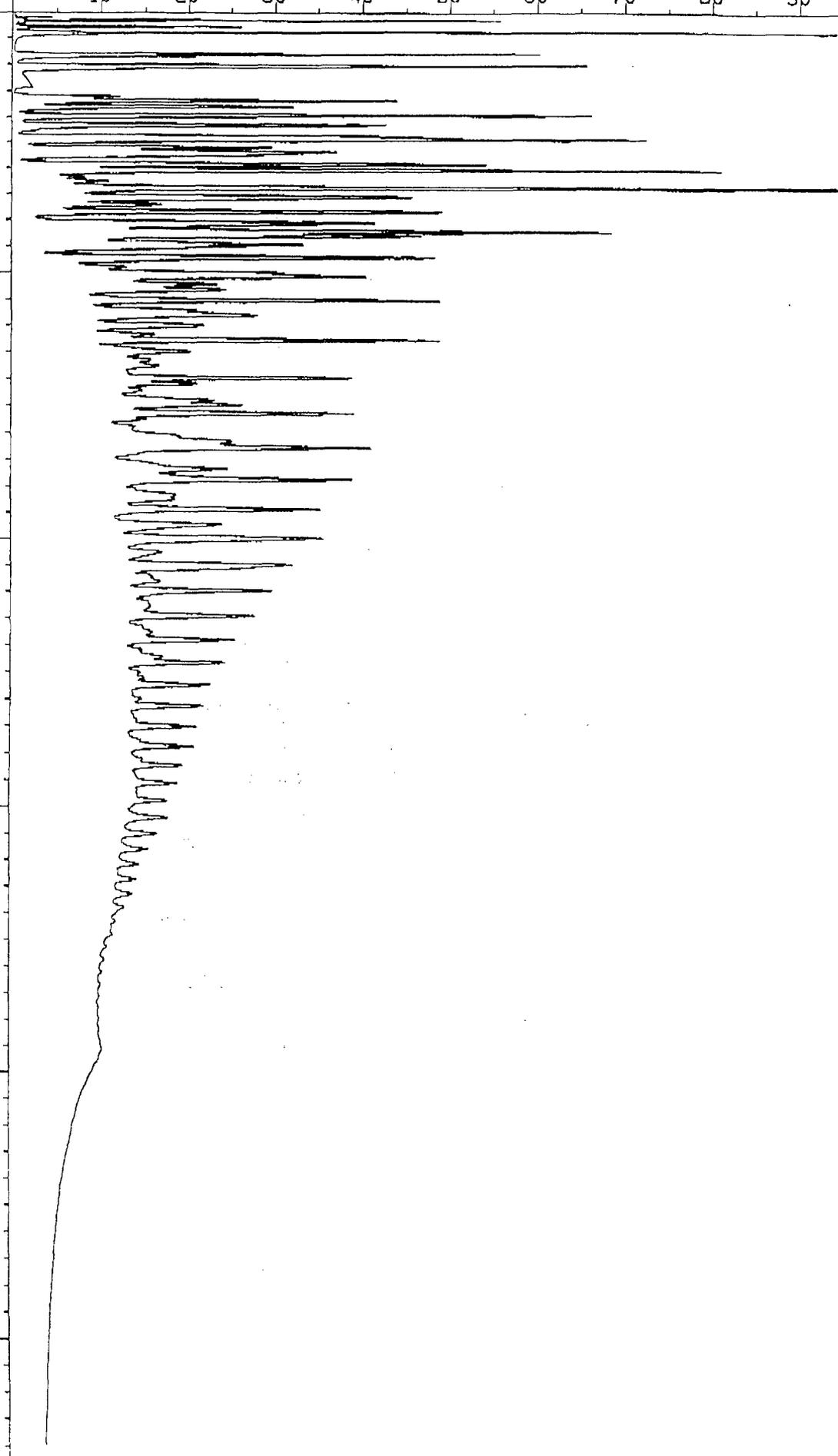
50

Minutes

IS1695  
Not analyzed yet

Instrument: 402

Inject time: 16:15:14 1/05/1996  
Vial: 0



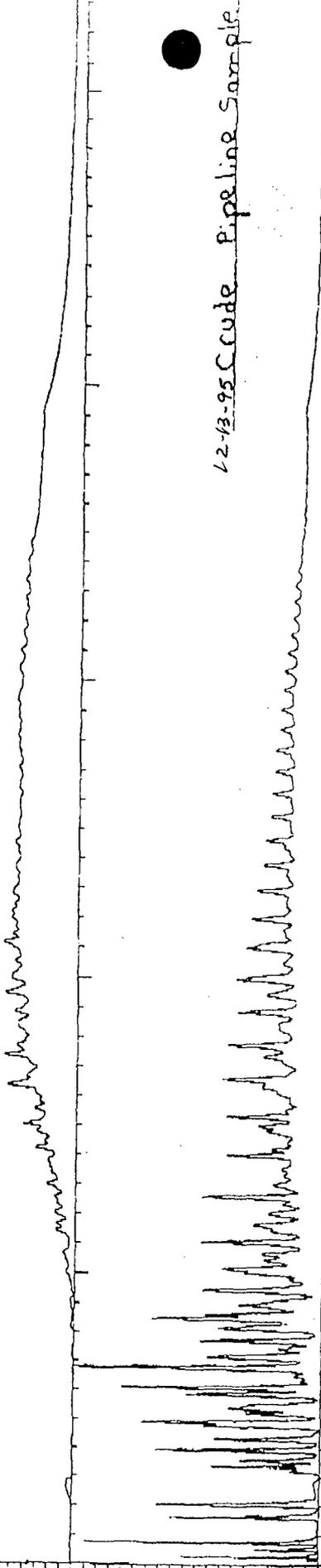
Intercal Standard Simulated Distillation

9:01:16 1/08/13

12-13-95 TNM10

12-13-95 Cude Pipeline Sample

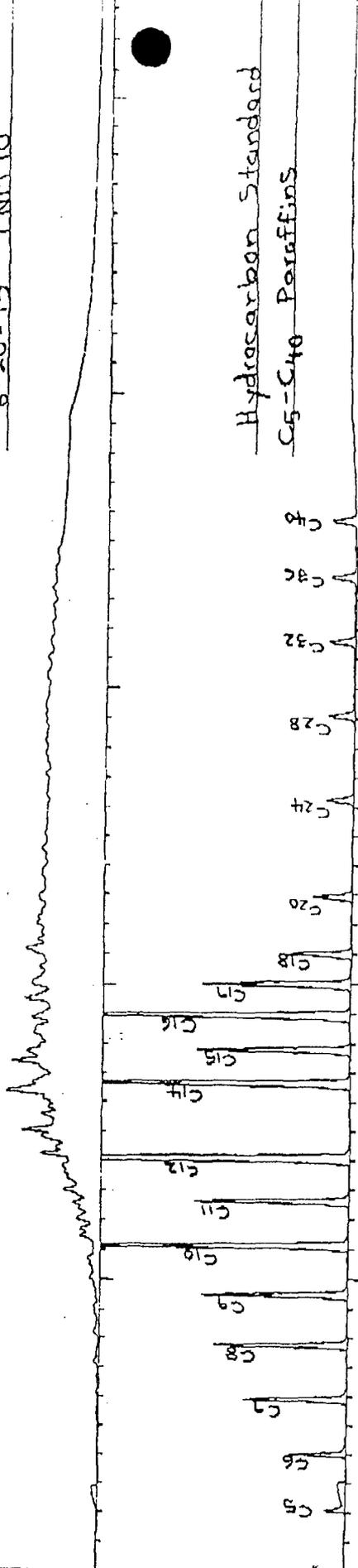
mVolts



6-20-95 TNM10

Hydrocarbon Standard  
C5-C40 Paraffins

Detector Response



Elution Time

IS1678

IS1683

IS1685

IS1681

Minute



⊕ MONITOR WELL

 EXCAVATED EARTH APPROXIMATELY 20' HIGH

- Notes:
- Existing structures in excavation area to be removed by others prior to start of excavation.
  - Dozer will remove soil in the direction of arrows 
  - Dozer will leave a "Plug" of soil no less than 43' from the existing cut where it intersects the sandstone 35' from the surface.
  - The slopes used to determine the 43' distance from the existing excavation at the sandstone are guides only. DURING THE OPERATION OF EQUIPMENT BOTH the top where the equipment is operating and the slope of the existing pit should be examined frequently for cracks on top, bulging at center or on toe of the slope and for particles falling off the slope beneath the operating equipment.
  - A backhoe will be positioned well back of the slope and carefully remove the "Plug" between the new and the old excavations.
  - The entire area "Abandoned Pit Area" is essentially a working ramp. Therefore, the 60' now shown should be extended 150'.

 ENVIRONMENTAL  
 SPILL CONTROL, Inc.  
 PHONE (505) 392-6167  
 FAX (505) 397-5085

**TEXACO Inc.** 

SAUNDERS PIT  
 PLAN OF PROPOSED  
 AND PRIOR EXCAVATION  
 NW4/SE4 SEC 18, T19S, R37E  
 LEA Co., NEW MEXICO

DATE: 7-24-95	DRAWN M.F.G.	REV. DATE 8-9-95	DIV
SCALE: 1" = 60'	JOB # 133		
SHEET 1 OF 2	FILE: SAUNDERS.DWG		

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-117 A  
Revised March 17, 1999

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Submit 5 Copies to  
Appropriate District Office

PERMIT NO. A-11802

**TANK CLEANING, SEDIMENT OIL REMOVAL, TRANSPORTATION OF MISCELLANEOUS HYDROCARBONS AND DISPOSAL PERMIT**

Operator or Owner Yates Petroleum Address 105 South 4th, Artesia, N.M. <sup>88210</sup>  
Lease or Facility Name Cotton SWD Location 14-19-25  
U.L. - Sec. - Twp. - Rge.

**OPERATION TO BE PERFORMED:**

Tank Cleaning  Sediment Oil Removal  Transportation of Miscellaneous Hydrocarbons

Operator or Owner Representative authorizing work \_\_\_\_\_

Date Work to be Performed 12-16-99  
**TANK CLEANING DATA** Tank Number N/A Volume 300

Tank Type Steel Volume Below Load Line \_\_\_\_\_  
**SEDIMENT OIL OR MISCELLANEOUS HYDROCARBON DATA**

Sediment Oil from:  Pit  Cellar  Other

**MISCELLANEOUS OIL**

Tank Bottoms From:  Pipeline Station  Crude Terminal  Refinery  Other\*

Catchings From:  Gasoline Plant  Gathering Lines  Salt Water Disposal System  Other\*  
 Pipeline Break Oil or Spill

\*Other (Explain) \_\_\_\_\_

**VOLUME AND DESTINATION:** Estimated Volume 10 Bbls. Field test volume of good oil \_\_\_\_\_ Bbls.  
(Not required prior to Division approval)

Destination (Name and Location of treating plant or other facility) \_\_\_\_\_

Old loco oil, P.O. Box 113, Loco Hills, N.M. 88255

**DESTRUCTION OF SEDIMENT OIL BY:**  Burning  Pit Disposal  Use on Roads or firewalls  Other

(Explain) \_\_\_\_\_

Location of Destruction \_\_\_\_\_

Justification of Destruction \_\_\_\_\_

**CERTIFICATION:** (APPLICATION MAY BE MADE BY EITHER OF THE FOLLOWING)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Owner Old loco oil Transporter \_\_\_\_\_  
By Tray Kinnibrough Address \_\_\_\_\_  
Title Plant manager Signature \_\_\_\_\_  
Date 12-16-99 Title \_\_\_\_\_ Date \_\_\_\_\_

**OIL CONSERVATION DIVISION**

Approved By Betty Rollins Title Tech Date DEC 20 1999

A COPY OF THIS FORM MUST BE ON LOCATION DURING TANK CLEANING, REMOVAL OF SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS, AND MUST BE PRESENTED WITH TANK BOTTOMS, SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS AT THE TREATING PLANT TO WHICH IT IS DELIVERED.

DISTRIBUTION BY OCD	
<input checked="" type="checkbox"/>	Santa Fe
<input type="checkbox"/>	File
<input type="checkbox"/>	Operator
<input type="checkbox"/>	Transporter (2)

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-117 A  
Revised March 17, 1999

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Submit 5 Copies to  
Appropriate District Office

PERMIT NO. A-11803

**TANK CLEANING, SEDIMENT OIL REMOVAL, TRANSPORTATION OF MISCELLANEOUS HYDROCARBONS AND DISPOSAL PERMIT**

Operator or Owner Marbob Energy Address Box 227, Artesia, N.M. 88210  
Lease or Facility Name Tyler #1 Location 21-17-30  
U.L. - Sec. - Twp. - Rge.

OPERATION TO BE PERFORMED:

- Tank Cleaning  Sediment Oil Removal  Transportation of Miscellaneous Hydrocarbons

Operator or Owner Representative authorizing work \_\_\_\_\_

Date Work to be Performed 12-16-99

**TANK CLEANING DATA** Tank Number 35520 Volume 500

Tank Type Steel Volume Below Load Line \_\_\_\_\_

**SEDIMENT OIL OR MISCELLANEOUS HYDROCARBON DATA**

Sediment Oil from:  Pit  Cellar  Other

**MISCELLANEOUS OIL**

Tank Bottoms From:  Pipeline Station  Crude Terminal  Refinery  Other\*

Catchings From:  Gasoline Plant  Gathering Lines  Salt Water Disposal System  Other\*

Pipeline Break Oil or Spill

\*Other (Explain) \_\_\_\_\_

**VOLUME AND DESTINATION:** Estimated Volume 15 Bbbs. Field test volume of good oil \_\_\_\_\_ Bbbs.  
(Not required prior to Division approval)

Destination (Name and Location of treating plant or other facility) \_\_\_\_\_

Old Loco Oil, P.O. Box 113, Loco Hills, 71-71-88255

**DESTRUCTION OF SEDIMENT OIL BY:**  Burning  Pit Disposal  Use on Roads or firewalls  Other

(Explain) \_\_\_\_\_

Location of Destruction \_\_\_\_\_

Justification of Destruction \_\_\_\_\_

**CERTIFICATION:** (APPLICATION MAY BE MADE BY EITHER OF THE FOLLOWING)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Owner Old Loco Oil Transporter \_\_\_\_\_

By Tray Kinnibrough Address \_\_\_\_\_

Title Plant manager Signature \_\_\_\_\_

Date 12-16-99 Title \_\_\_\_\_ Date \_\_\_\_\_

**OIL CONSERVATION DIVISION**

Approved By Betty Rollins Title Tech Date DEC 20 1999

A COPY OF THIS FORM MUST BE ON LOCATION DURING TANK CLEANING, REMOVAL OF SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS, AND MUST BE PRESENTED WITH TANK BOTTOMS, SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS AT THE TREATING PLANT TO WHICH IT IS DELIVERED.

DISTRIBUTION BY OCD	
<input checked="" type="checkbox"/>	Santa Fe
<input type="checkbox"/>	File
<input type="checkbox"/>	Operator
<input type="checkbox"/>	Transporter (2)

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-117 A  
Revised March 17, 1999

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Submit 5 Copies to  
Appropriate District Office

PERMIT NO. A-11804

**TANK CLEANING, SEDIMENT OIL REMOVAL, TRANSPORTATION OF MISCELLANEOUS HYDROCARBONS AND DISPOSAL PERMIT**

Operator or Owner R.C. Bennett Address Box 264, Midland, Texas 79702

Lease or Facility Name Exxon State #2 Location 25-19-28  
U.L. - Sec. - Twp. - Rge.

OPERATION TO BE PERFORMED:

- Tank Cleaning  Sediment Oil Removal  Transportation of Miscellaneous Hydrocarbons

Operator or Owner Representative authorizing work \_\_\_\_\_

Date Work to be Performed 12-16-99

**TANK CLEANING DATA** Tank Number \_\_\_\_\_ Volume \_\_\_\_\_

Tank Type \_\_\_\_\_ Volume Below Load Line \_\_\_\_\_

**SEDIMENT OIL OR MISCELLANEOUS HYDROCARBON DATA**

Sediment Oil from:  Pit  Cellar  Other

**MISCELLANEOUS OIL**

Tank Bottoms From:  Pipeline Station  Crude Terminal  Refinery  Other\*

Catchings From:  Gasoline Plant  Gathering Lines  Salt Water Disposal System  Other\*

Pipeline Break Oil or Spill

\*Other (Explain) Bottoms

**VOLUME AND DESTINATION:** Estimated Volume 5 Bbls. Field test volume of good oil \_\_\_\_\_ Bbls.  
(Not required prior to Division approval)

Destination (Name and Location of treating plant or other facility) \_\_\_\_\_

Old loco Oil, P.O. Box 113, loco Wells, m-m. 88255

**DESTRUCTION OF SEDIMENT OIL BY:**  Burning  Pit Disposal  Use on Roads or firewalls  Other

(Explain) \_\_\_\_\_

Location of Destruction \_\_\_\_\_

Justification of Destruction \_\_\_\_\_

**CERTIFICATION:** (APPLICATION MAY BE MADE BY EITHER OF THE FOLLOWING)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Owner Old loco Oil Transporter \_\_\_\_\_

By Tray Kinnibrough Address \_\_\_\_\_

Title Plant manager Signature \_\_\_\_\_

Date 12-16-99 Title \_\_\_\_\_ Date \_\_\_\_\_

**OIL CONSERVATION DIVISION**

Approved By Betty Rollins Title Tech Date DEC 20 1999

A COPY OF THIS FORM MUST BE ON LOCATION DURING TANK CLEANING, REMOVAL OF SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS, AND MUST BE PRESENTED WITH TANK BOTTOMS, SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS AT THE TREATING PLANT TO WHICH IT IS DELIVERED.

DISTRIBUTION BY OCD	
<input checked="" type="checkbox"/>	Santa Fe
<input type="checkbox"/>	File
<input type="checkbox"/>	Operator
<input type="checkbox"/>	Transporter (2)

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-117 A  
Revised March 17, 1999

Submit 5 Copies to  
Appropriate District Office

PERMIT NO. A-11807

**TANK CLEANING, SEDIMENT OIL REMOVAL, TRANSPORTATION OF MISCELLANEOUS HYDROCARBONS AND DISPOSAL PERMIT**

Operator or Owner Thornton Operating Address P.O. Box 1995, Roswell, NM 88201  
Lease or Facility Name Anchor Deep #1 Location 9-14-29  
U.L. - Sec. - Twp. - Rge.

OPERATION TO BE PERFORMED:

- Tank Cleaning     Sediment Oil Removal     Transportation of Miscellaneous Hydrocarbons

Operator or Owner Representative authorizing work \_\_\_\_\_

Date Work to be Performed 12-17-99  
**TANK CLEANING DATA** Tank Number 121508 Volume 500

Tank Type Steel Volume Below Load Line \_\_\_\_\_

**SEDIMENT OIL OR MISCELLANEOUS HYDROCARBON DATA**

Sediment Oil from:  Pit  Cellar  Other

**MISCELLANEOUS OIL**

Tank Bottoms From:  Pipeline Station  Crude Terminal  Refinery  Other\*

Catchings From:  Gasoline Plant  Gathering Lines  Salt Water Disposal System  Other\*

Pipeline Break Oil or Spill

\*Other (Explain) \_\_\_\_\_

**VOLUME AND DESTINATION:** Estimated Volume 35 Bbls. Field test volume of good oil \_\_\_\_\_ Bbls.  
(Not required prior to Division approval)

Destination (Name and Location of treating plant or other facility) \_\_\_\_\_

Old Loco Oil, P.O. Box 113, Loco Hills, N.M. 88255

**DESTRUCTION OF SEDIMENT OIL BY:**  Burning  Pit Disposal  Use on Roads or firewalls  Other

(Explain) \_\_\_\_\_

Location of Destruction \_\_\_\_\_

Justification of Destruction \_\_\_\_\_

**CERTIFICATION:** (APPLICATION MAY BE MADE BY EITHER OF THE FOLLOWING)

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

Owner Old Loco Oil Transporter \_\_\_\_\_  
By Tray Kinnibrough Address \_\_\_\_\_  
Title Plant Manager Signature \_\_\_\_\_  
Date 12-17-99 Title \_\_\_\_\_ Date \_\_\_\_\_

**OIL CONSERVATION DIVISION**

Approved By Betty Rollins Title Tech Date DEC 20 1999

A COPY OF THIS FORM MUST BE ON LOCATION DURING TANK CLEANING, REMOVAL OF SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS, AND MUST BE PRESENTED WITH TANK BOTTOMS, SEDIMENT OIL OR MISCELLANEOUS HYDROCARBONS AT THE TREATING PLANT TO WHICH IT IS DELIVERED.

DISTRIBUTION BY OCD	
<input checked="" type="checkbox"/>	Santa Fe
<input type="checkbox"/>	File
<input type="checkbox"/>	Operator
<input type="checkbox"/>	Transporter (2)



RECEIVED

JAN 11 1996

NM GENERAL CONTRACTORS LIC. #55535  
TX DRILLING LIC. #5005M  
NM DRILLING LIC. #WD 1349

P.O. BOX 5890 ☆ HOBBS, NM 88241

PHONE (505) 392-6167 ☆ FAX (505) 397-5085

January 8, 1996

Mr. Olson:

Environmental Spill Control has completed the installation of six additional monitor wells at the Saunders Excavation, 18-T19S-R37E to further assess subsurface conditions for both Texaco, Inc. and Texas - New Mexico Pipe Line Company. The workplan we originally submitted was modified from the installation of one downgradient monitor well to include five additional upgradient wells to assess the potential of an active source contributing to the previously identified release.

The results of the field TPH and OVA screening of soil samples collected during drilling operations identified no evidence of hydrocarbon contamination. A report documenting the work performed at the site, including analytical results, soil boring logs, and well construction details is currently being prepared for submittal to the NMOCD. A site map showing the location of all monitor wells, outline of the excavation and the most recent groundwater elevation data is attached.

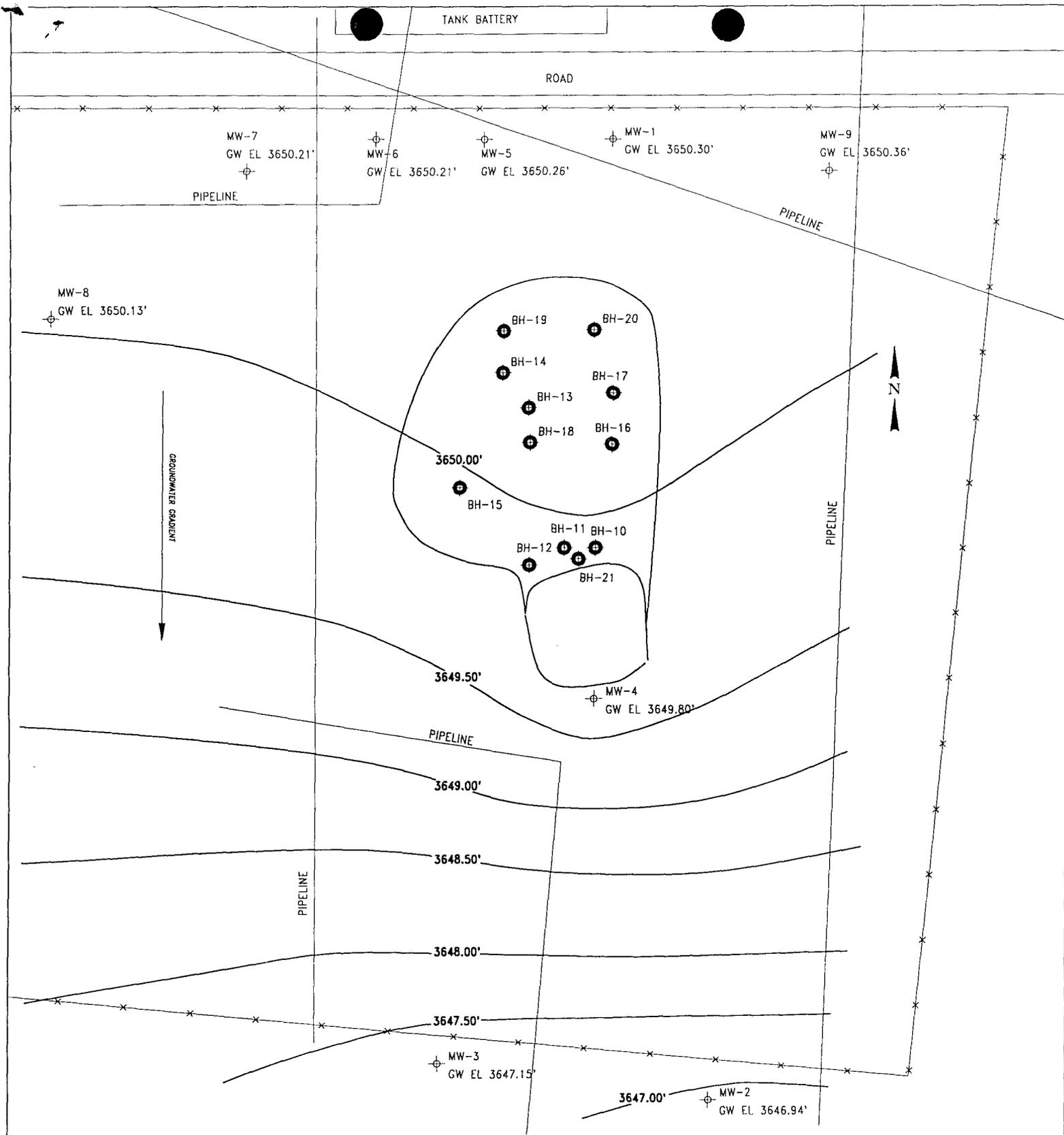
On behalf of both Texaco and Texas - New Mexico Pipe Line, we are requesting to modify item number 4 of your work plan review dated October 6, 1995. Item No. 4 requires the monitor wells to be sampled for BTEX, major cations and anions, heavy metals, and PAH using EPA approved methods. Because of the number of additional wells installed ( all of which appear to be free of hydrocarbon contamination) we propose to sample MW-1, MW-2, MW-3, MW-4, and MW-7 for BTEX, major cations and anions, heavy metals, PAH, pH, and chloride. We propose to sample MW-5, MW-6, MW-8, and MW-9 for BTEX, pH, and chloride.

If you do not agree with our modifications or have any questions, please call me at 505-392-6167.

Sincerely,

F. Wesley Root  
Division Manager Geology/Hydrology  
Environmental Spill Control

cc. Mr. Larry Lehman, Texaco Exploration and Production  
Mr. Wayne Price, OCD Hobbs Office  
Mr. Allen Hodge, ESC



⊕ BORING LOCATION

⊕ MONITOR WELL

GROUNDWATER ELEVATION MEASURED ON 1-4-96

CONTOUR INTERVAL = 0.50 FEET

**ENVIRONMENTAL**  
 SPILL CONTROL, Inc.  
 PHONE (505) 392-6167  
 FAX (505) 397-5085

**TEXACO Inc.** 

SAUNDERS EXCAVATION  
 GROUNDWATER ELEVATION  
 NW4/SE4 SEC 18, T19S, R37E  
 LEA Co., NEW MEXICO

DATE: 7-24-95	DRAWN M.F.G.	REV. DATE 1-8-96	DIV
SCALE: 1" = 60'	JOB #	133	
DRAWING 4 OF 5	FILE:	SAUNDERS.DWG	



NM GENERAL CONTRACTORS LIC. #55835  
 TX DRILLING LIC. #5005M  
 NM DRILLING LIC. #WD 1349

P.O. BOX 3890 ★ HOBBS, NM 88241  
 PHONE (505) 392-6167 ★ FAX (505) 397-5055

**RECEIVED**

**JAN 09 1996**

Environmental Bureau  
 Oil Conservation Division

January 8, 1996

Mr. Olson:

Environmental Spill Control has completed the installation of six additional monitor wells at the Saunders Excavation, 18-T19S-R37E to further assess subsurface conditions for both Texaco, Inc. and Texas - New Mexico Pipe Line Company. The workplan we originally submitted was modified from the installation of one downgradient monitor well to include five additional upgradient wells to assess the potential of an active source contributing to the previously identified release.

The results of the field TPH and OVA screening of soil samples collected during drilling operations identified no evidence of hydrocarbon contamination. A report documenting the work performed at the site, including analytical results, soil boring logs, and well construction details is currently being prepared for submittal to the NMOCD. A site map showing the location of all monitor wells, outline of the excavation and the most recent groundwater elevation data is attached.

On behalf of both Texaco and Texas - New Mexico Pipe Line, we are requesting to modify item number 4 of your work plan review dated October 6, 1995. Item No. 4 requires the monitor wells to be sampled for BTEX, major cations and anions, heavy metals, and PAH using EPA approved methods. Because of the number of additional wells installed ( all of which appear to be free of hydrocarbon contamination) we propose to sample MW-1, MW-2, MW-3, MW-4, and MW-7 for BTEX, major cations and anions, heavy metals, PAH, pH, and chloride. We propose to sample MW-5, MW-6, MW-8, and MW-9 for BTEX, pH, and chloride.

If you do not agree with our modifications or have any questions, please call me at 505-392-6167.

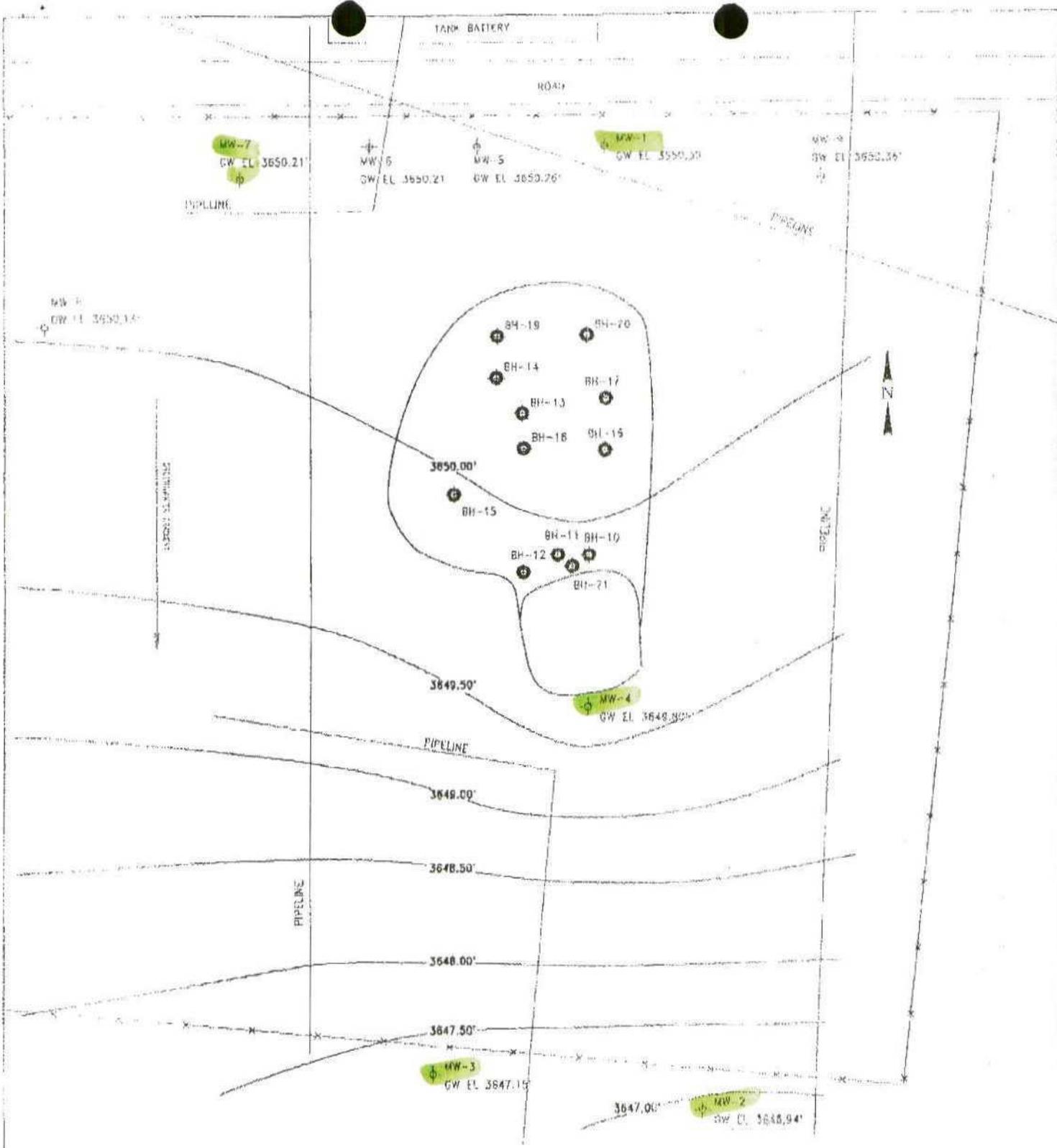
Sincerely,

*F. Wesley Root*

F. Wesley Root  
 Division Manager Geology/Hydrology  
 Environmental Spill Control

cc: Mr. Larry Lehman, Texaco Exploration and Production  
 Mr. Wayne Price, OCD Hobbs Office  
 Mr. Allen Hodge, ESC

*1/9/96*  
*Verbal approval*  
*to Wes Root at*  
*0815 hrs.*  
*W. Olson*



- BORING LOCATION
- ⊕ MONITOR WELL
- GROUNDWATER ELEVATION MEASURED ON 1-4-95
- CONTOUR INTERVAL = 0.50 FEET



**TEXACO Inc.** 

SAUNDERS EXCAVATION  
GROUNDWATER ELEVATION  
NW4/5E4 SEC 18, T19S, R37E  
LEA Co., NEW MEXICO

DATE: 7-24-95	DRAWN: M.F.G.	REV. DATE: 1-8-98	DIY
SCALE: 1" = 60'		JOB #	133
DRAWING: 4 OF 5		FILE:	SAUNDERS.DWG

## FAX TRANSMISSION

## ENVIRONMENTAL SPILL CONTROL, INC.

Phone (505) 392-6167  
Fax (505) 397-5085  
1203 West Dunham  
P.O. Box 5890  
Hobbs, New Mexico 88241

Date 1-17 1996  
Fax Number 505-827-8177  
To Mr. Bill Wilson  
With U.S. Fish Conservation Division  
From Chris Kent  
Page 1 of 3 Pages

Message Request to change MLE sampling  
plan at the Sycamore Excavation  
is attached



CC: JERRY BEYTON

OIL CONSERVATION DIVISION  
RECEIVED

'95 DE 18 AM 8 52

NM GENERAL CONTRACTORS LIC. #55535  
TX DRILLING LIC. #5005M  
NM DRILLING LIC. #WD 1349

P.O. BOX 5890 ★ HOBBS, NM 88241  
PHONE (505) 392-6167 ★ FAX (505) 397-5085

December 8, 1995

Mr. Bill Olson  
Oil Conservation Division  
1000 W. Broadway  
Hobbs, New Mexico 88240

RE: Texaco Saunders Pit Excavation

**RECEIVED**  
DEC 08 1995  
OIL CONSERVATION  
HOBBS  
OFFICE

Dear Mr. Olson:

On December 7, 1995 Environmental Spill Control, Inc. began drilling at the Saunders Pit. From 8:00 am until approximately 1:00 pm, eight borings were made in the bottom of the pit. Seven of the eight boring holes drilled were contaminated. Water was encountered at 9 feet as well as free product. A bell hole was dug at the north end of the pit to approximately 12 feet. The bell hole began filling with free product and water.

Environmental Spill Control, Inc. proposes to put in 5 permanent monitor wells around the north and northwest boundaries of the pit to identify any outside sources of contamination.

If you have any further questions or desire any other information, please feel free to contact us at any time.

Sincerely,  
ENVIRONMENTAL SPILL CONTROL, INC.

Allen Hodge, REM  
Field Superintendent

cc: Larry Lehman, Texaco

Ols1208.sam

TO: Bill Olson

04 CONSERVATION DATE: 08-09-95  
RECEIVED TIME: 14:33

CC: Jerry Sexton  
Wayne Price

'95 AUG 14 AM 8 52

SUBJECT: Tex-New Mex P.L. spill & Old Texaco Pit  
PRIORITY: 4  
ATTACHMENTS:

-----  
Dear Bill,

Per our telephone conversation today I am forwarding the work plan submitted by Texaco for the Pit that is associated with the Tex-New Mex pipe line spill NW of Monument NM. I understand that since ground water has been impacted that your office will handle this submittal.

Thank You!  
  
=====

Submit 3 Copies  
to Appropriate  
District Office

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-103  
Revised 1-1-89

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88240

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88210

DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410

**OIL CONSERVATION DIVISION**  
310 Old Santa Fe Trail, Room 206  
Santa Fe, New Mexico 87503

WELL API NO.
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No.

7. Lease Name or Unit Agreement Name C.J. Saunders Federal Battery # 1
8. Well No.
9. Pool name or Wildcat

**SUNDRY NOTICES AND REPORTS ON WELLS**  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A  
DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT"  
(FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well:  
 OIL WELL  GAS WELL  Emergency Overflow Pit  
 OTHER

2. Name of Operator  
Texaco

3. Address of Operator  
P.O. Box 730, 205 E. Bender Blvd., Hobbs, NM 88241

4. Well Location  
 Unit Letter \_\_\_\_\_ : \_\_\_\_\_ Feet From The \_\_\_\_\_ Line and \_\_\_\_\_ Feet From The \_\_\_\_\_ Line  
 NW4 SE4  
 Section 18 Township 19S Range 37E NMPM Lea County

10. Elevation (Show whether DF, RKB, RT, GR, etc.)



11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input checked="" type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>		CASING TEST AND CEMENT JOB <input type="checkbox"/>	
OTHER: _____ <input type="checkbox"/>		OTHER: _____ <input type="checkbox"/>	

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

It is our intent to remediate the emergency overflow pit which is associated with the C.J. Saunders Federal Battery # 1. The pit is an unlined inground earthen pit. Approximate size of the pit is 60 feet by 150 feet. The contamination has reached the 36 foot level in some spots. There will be approximately 12,000 cubic yards of non-hazardous oilfield waste excavated. The contamination will be treated on-site by vertical mixing and some fresh soil dilution to insure that the contamination levels reach below 1,000 ppm under the OCD Closure Guidelines.

**RECEIVED**  
AUG 14 1995  
Environmental Bureau  
Oil Conservation Division

**RECEIVED**  
AUG 07 1995  
OCD HOBBS  
OFFICE

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Larry Lehman TITLE Prod. Supv. E H & S Rep. DATE 8/7/95

TYPE OR PRINT NAME \_\_\_\_\_ TELEPHONE NO. \_\_\_\_\_

(This space for State Use)

APPROVED BY Will C. Olson TITLE Geologist IV DATE 8/16/95

CONDITIONS OF APPROVAL, IF ANY:  
approved according to attached conditions.

**OCD APPROVAL CONDITIONS**  
**FOR**  
**RCRA EXEMPT**  
**UNLINED PIT CLOSURES**  
**(August 16, 1995)**

1. The following closure actions will be performed in accordance with OCD's February 1993 "SURFACE IMPOUNDMENT CLOSURE GUIDELINES":
  - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
  - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
  - c. Final soil contaminant concentrations in excavated and landfarmed areas will be determined upon completion of remedial actions.
  - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons.
2. All wastes removed from a site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to a pit closure.
4. Upon completion of all closure activities, a completed OCD "Pit Remediation and Closure Report" form containing the results of all pit closure and soil remediation activities will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final pit closure reports be submitted only upon completion of all closure activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Santa Fe Office for approval with copies provided to the OCD Hobbs Office.
6. OCD approval does not relieve you of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if the closure activities fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Tex-New Mex Pipeline spill # 10  
**Date:** Tuesday, June 27, 1995 4:47PM  
**Priority:** High

Dear Bill,

Ref: TNMP spill # 10 which is the one located 3 mi. NW of Monument  
sec 18-19s-37e.

During excavation, it appears that TNMP has excavated into an old pit. During my site visit this morning, Wayne Minchew of Texaco E & P indicated to me that Texaco E & P has researched its records and personnel and has determined that this old pit was theirs. The pit was used to discharge waste into from the nearby tank battery which sets to the north. This battery is now operated by Amerado Hess. Mr. Minchew indicated to me that Texaco sold this lease to Amerada but retains the liability for the pit.

Mr. Minchew indicated to me that they are going to use the same contractor that is on site for TNMP to delineate the size of the pit. They are going to drill approximately 6 to 7 bore holes down to the water table. Their time frame for this is to start on Wednesday June 28, 1995.

Please note Texaco has volunteered for this clean-up.

Please advise us on the procedure to use since it appears they are going to drill to the water table.

Thanks!

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Tex-New Mex P.L. spill & Old Texaco Pit  
**Date:** Wednesday, August 09, 1995 2:37PM  
**Priority:** High

Dear Bill,

Per our telephone conversation today I am forwarding the work plan submitted by Texaco for the Pit that is associated with the Tex-New Mex pipe line spill NW of Monument NM. I understand that since ground water has been impacted that your office will handle this submittal.

Thank You!

# **EOTT ENERGY Pipeline Limited Partnership**

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-3761

**FEDERAL EXPRESS**  
**AIR BILL # 8170 0342 3660**

March 30, 2000

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: William Olson

**RE: ANNUAL GROUND WATER MONITORING REPORTS**

Dear Mr. Olson:

Attached please find the 2000 Annual Groundwater Monitoring Reports for the following sites:

Monument #18	Monument #10
Monument #17	TNM-97-16 (Becky Jo Doom site)
Monument #2	HDO-90-23
Monument #15	SPS-11
TNM-97-17	TNM-98-02
TNM-97-18	TNM-98-S01
TNM-98-05A	TNM-97-23
TNM-96-16	TNM-95-10 (Saunders)
TNM-97-14	TNM-97-04 (Townsend)

I hope all meets with OCD requirements for closure of the site but if you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,



Lennah Frost  
Sr. Environmental Engineer

cc: Environmental File

**Olson, William**

**From:** Olson, William  
**Sent:** Thursday, July 27, 2000 9:48 AM  
**To:** 'Glenn\_Waldrop@eott.com'  
**Subject:** RE: CALICHE FROM R.L. ROGERS SITE

The below referenced request is approved.

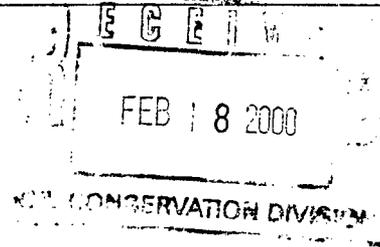
-----  
**From:** Glenn\_Waldrop@eott.com [SMTP:Glenn\_Waldrop@eott.com]  
**Sent:** Tuesday, July 25, 2000 12:40 PM  
**To:** Olson, William  
**Subject:** CALICHE FROM R.L. ROGERS SITE  
**Importance:** High

Per your discussion with Wayne Brunette, we would like to take the leftover caliche from the R.L. Rogers leak site to use as backfill on the Texaco Saunders site. The analyticals indicate the TPH to be below 100 ppm. Texaco is agreeable to accept this material as long as the state agrees with this in writing. Do we have permission to proceed? Thanks for your consideration.



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191



Date: February 9, 2000

Mr. William C. Olson  
Hydrogeologist  
New Mexico Oil Conservation Division  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: Work Plan for Saunders Excavation Site:  
Unit Letter "J": Sec. 18, Township 19S, Range 37 E:

Dear Mr. Olson:

Eott Energy Pipeline Limited Partnership and Texaco Exploration and Production Inc. would like to submit the following work plan for the Saunders Excavation site.

The existing piles will be sampled to determine the extent of contamination. BTEX and TPH analysis will be conducted on each sample. The bottom of the excavation will be capped with a clay liner. Contaminated and non-contaminated soils will be blended to a maximum of 1000 TPH with 8015 modified analysis. Soils that will not blend down to this TPH level will be hauled to the Texaco landfarm and replaced with clean soil. Soil will be placed into the excavation and samples pulled throughout the backfill. Two monitor wells will be placed down stream of the center of the excavation, to the Southeast. The NMOCD will be provided a closure plan at the end of the project.

Eott Energy and Texaco would like to begin work immediately. We appreciate the cooperation of the NMOCD in this matter.

Sincerely:

Eott Energy Pipeline Limited Partnership  
Lennah Frost

Texaco Exploration and Production Inc.  
Rodney Bailey

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 682-3761

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT #Z470651231**

October 15, 1999

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: William Olson



**RE: TNM-95-10/SAUNDERS SPILL SITE**  
**LEA COUNTY, NEW MEXICO**

Dear Mr. Olson:

As per your letter dated September 2, 1999, attached please find the following information:

1. Tables of the results of first, second and third quarter ground water monitoring and laboratory results of these samples/
2. Site map which shows the location of the spill, the former pit and direction and magnitude of the hydraulic gradient at the site.

I hope all meets with OCD approval. EOTT is anxious to have our portion of this site closed as soon as possible. If you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,

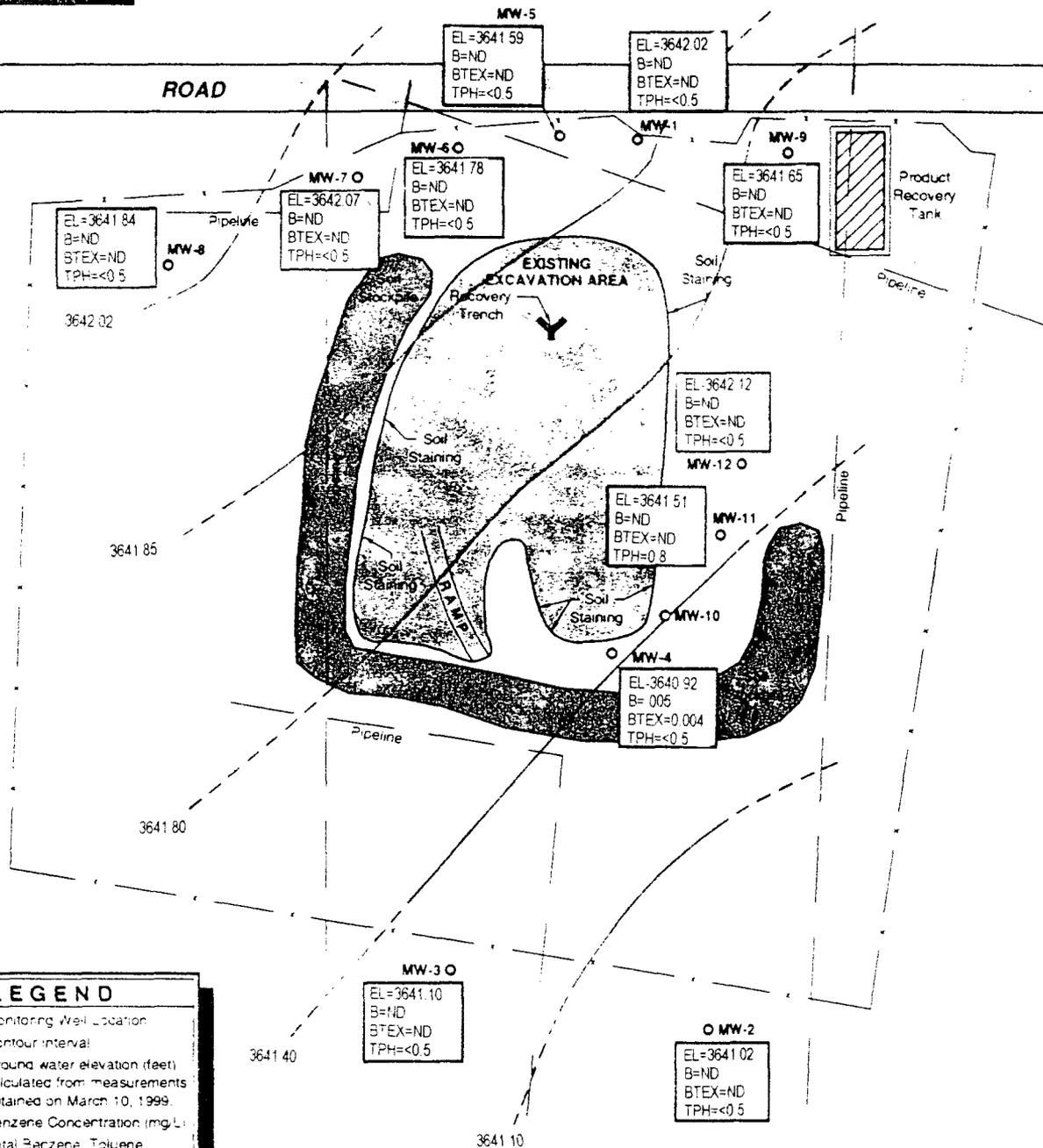
A handwritten signature in cursive script that reads 'Lennah Frost'. The signature is written in dark ink and is positioned above the typed name.

Lennah Frost  
Sr. Environmental Engineer

cc: Al Hugh - Environmental File  
NMOCD Hobbs District Office

Approximate Scale: 1"=80'

Apparent direction of ground water flow



**LEGEND**

- Monitoring Well Location
- Contour Interval
- EL = Ground water elevation (feet) calculated from measurements obtained on March 10, 1999.
- B = Benzene Concentration (mg/L)
- BTEX = Total Benzene, Toluene, Ethylbenzene, and Xylenes Concentration (mg/L)
- TPH = Total Petroleum Hydrocarbon Concentration (mg/L)
- ND = Not Detected

**NOTE**

- Ground water samples were obtained on September 15 and 16 1999
- MW-10 removed due to expanding excavation

**GROUND WATER CONTOURS / CONCENTRATION MAP -**

SECTION 18, T19S, AND R37E      LEA COUNTY, NEW MEXICO      FIG 1



CERTIFICATE OF ANALYSIS SUMMARY -91028

KEI Consultants, Ltd.

Project ID: 610062-1-0  
Project Manager: S. Grover/T. Nix  
Project Location: Lea County NM

Project Name: Saunders

Date Received in Lab: Mar 11, 1999 09:50  
Date Report Faxed: Mar 26, 1999

XENCO contact: Carlos Castro/Karen Olson

Analysis Requested	Lab ID: Field ID: Depth: Matrix: Sampled:	91028 001 MW-1 Liquid 03/10/99 10:45	91028 002 MW-2 Liquid 03/10/99 09:10	91028 003 MW-3 Liquid 03/10/99 09:55	91028 004 MW-4 Liquid 03/10/99 14:30	91028 005 MW-5 Liquid 03/10/99 14:45	91028 006 MW-6 Liquid 03/10/99 14:50
TPH-DRO (Diesel) EPA 8015 M		R.L. < 0.2 (0.2)	R.L. < 0.2 (0.2)	R.L. < 0.2 (0.2)	R.L. 0.3 (0.2)	R.L. 0.2 (0.2)	R.L. 0.3 (0.2)
BTEX	Analyzed: Units:	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.
EPA 8021B		ppm	ppm	ppm	ppm	ppm	ppm
Benzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.006 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Toluene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Ethylbenzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
m,p-Xylene		< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)
o-Xylene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Total BTEX		N/D	N/D	N/D	0.007	N/D	N/D

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of KEI Consultants, Ltd. The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

Eddie L. Clemons, II  
QA/QC Manager



**CERTIFICATE OF ANALYSIS SUMMARY -91028**

**KEI Consultants, Ltd.**

Project ID: 610062-1-0  
 Project Manager: S. Grover/T. Nix  
 Project Location: Lea County NM

Project Name: Saunders

Date Received in Lab: Mar 11, 1999 09:50

Date Report Faxed: Mar 26, 1999

XENCO contact : Carlos Castro/Karen Olson

**Analysis Requested**

Lab ID: Field ID: Depth: Matrix: Sampled:	91028 007 MW-7 Liquid 03/10/99 15:00	91028 008 MW-8 Liquid 03/10/99 15:10	91028 009 MW-9 Liquid 03/10/99 13:45	91028 010 MW-11 Liquid 03/10/99 14:15	91028 011 MW-12 Liquid 03/10/99 14:00
TPH-DRO (Diesel) EPA 8015 M	03/25/99 mg/L R.L. < 0.2 (0.2)	03/25/99 mg/L R.L. < 0.2 (0.2)	03/25/99 mg/L R.L. < 0.2 (0.2)	03/25/99 mg/L R.L. 5.9 (0.2)	03/25/99 mg/L R.L. 84.0 (2.0)
BTEX EPA 8021B	03/12/99 ppm R.L.	03/12/99 ppm R.L.	03/12/99 ppm R.L.	03/12/99 ppm R.L.	03/12/99 ppm R.L.
Benzene	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.004 (0.004)	< 0.004 (0.004)
Toluene	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.004 (0.004)	< 0.004 (0.004)
Ethylbenzene	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.004 (0.004)	< 0.004 (0.004)
m,p-Xylene	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.008 (0.008)	< 0.008 (0.008)
o-Xylene	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.004 (0.004)	< 0.004 (0.004)
Total BTEX	N.D.	N.D.	N.D.	N.D.	N.D.

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Eddie L. Clemons, II  
 QA/QC Manager



CERTIFICATE OF ANALYSIS SUMMARY -92037

KEI Consultants, Ltd.  
Project Name: EOTT

Project ID: 910082-1-0  
Project Manager: S. Grover/T. Nix  
Project Location: Lea County, NM

Date Received in Lab: May 20, 1999 10:00  
Date Report Faxed: Jun 1, 1999

XENCO contact: Carlos Castro/Debbie Simmons

Analysis Requested	Lab ID:		92037 001		92037 002		92037 003		92037 004		92037 005		92037 006	
	Field ID:	Depth:	MW-1	Liquid	MW-2	Liquid	MW-3	Liquid	MW-4	Liquid	MW-5	Liquid	MW-11	Liquid
Matrix:														
Sampled:			05/19/99 11:20		05/19/99 10:35	05/19/99 09:50	05/19/99 11:50	05/19/99 15:15	05/19/99 12:50					
Analyzed:			05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99	05/24/99
Units:			mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Analyzed:			05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99	05/25/99
Units:			ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm	ppm
TPH-DRO (Diesel)			0.9 (0.2)	< 0.2 (0.2)	< 0.2 (0.2)	< 0.2 (0.2)	0.5 (0.2)	0.6 (0.2)	7.4 (0.2)					
EPA 8015 M			R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.	R.L.
TPH - DRO (Diesel)														
BTEX														
EPA 8021B														
Benzene			< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.043 (0.001)	< 0.001 (0.001)	0.007 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.007 (0.001)
Toluene			< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.003 (0.001)	< 0.001 (0.001)	0.003 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Ethylbenzene			< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.005 (0.001)	< 0.001 (0.001)	0.005 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
m,p-Xylene			< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	0.007 (0.002)	< 0.002 (0.002)	0.007 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)
o-Xylene			< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	0.016 (0.001)	< 0.001 (0.001)	0.016 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Total BTEX			N.D.	N.D.	N.D.	N.D.	0.074	N.D.	0.074	N.D.	N.D.	N.D.	N.D.	0.007

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Eddie L. Clemons, II  
QA/QC Manager



**CERTIFICATE OF ANALYSIS SUMMARY -92059**

**KEI Consultants, Ltd.**

*Project Name: EOTT*

Project ID: 910082-1-0

Project Manager: S.Grover/T.Nix

Project Location: Lea County, NM

Date Received in Lab: ~~May 21, 1999~~ 10:15

Date Report Faxed: Jun 1, 1999

**XENCO contact** : Carlos Castro/Debbie Simmons

<i>Analysis Requested</i>	Lab ID: Field ID: Depth: Matrix: Sampled:	92059 001	92059 002	92059 003
		MW-6	MW-7	MW-8
TPH-DRO (Diesel) EPA 8015 M	Analyzed: Units:	05/24/99 R.L. mg/L	05/24/99 R.L. mg/L	05/24/99 R.L. mg/L
TPH - DRO (Diesel)		0.3 (0.2)	< 0.2 (0.2)	< 0.2 (0.2)
BTEX EPA 8021B	Analyzed: Units:	05/26/99 R.L. ppm	05/26/99 R.L. ppm	05/26/99 R.L. ppm
Benzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Toluene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Ethylbenzene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
m,p-Xylene		< 0.002 (0.002)	< 0.002 (0.002)	< 0.002 (0.002)
o-Xylene		< 0.001 (0.001)	< 0.001 (0.001)	< 0.001 (0.001)
Total BTEX		N.D.	N.D.	N.D.

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The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. Xenco Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

  
 Eddie L. Simmons, II  
 QA/QC Manager



CERTIFICATE OF ANALYSIS SUMMARY -92037

Project ID: 910082-1-0  
Project Manager: S.Grover/T.Nix  
Project Location: Lea County, NM

KEI Consultants, Ltd.  
Project Name: EOTT

Date Received in Lab: May 20, 1999 10:00  
Date Report Faxed: Jun 1, 1999  
XENCO contact: Carlos Castro/Debbie Simmons

Analysis Requested

Lab ID: Field ID: Depth: Matrix: Sampled:	92037 007 MW-12 Liquid 05/19/99 13:40	92037 008 MW-9 Liquid 05/19/99 14:30		
TPH-DRO (Diesel) EPA 8015 M	Analyzed: Units: mg/L 35.3 (1.0) R.L.	Analyzed: Units: mg/L 0.2 (0.2) R.L.		
BTEX EPA 8021B	Analyzed: Units: ppm 0.006 (0.001) R.L.	Analyzed: Units: ppm 0.001 (0.001) R.L.		
Benzene	< 0.001 (0.001)	< 0.001 (0.001)		
Toluene	0.001 (0.001)	< 0.001 (0.001)		
Ethylbenzene	< 0.002 (0.002)	< 0.001 (0.001)		
m,p-Xylene	0.003 (0.001)	< 0.001 (0.001)		
o-Xylene	0.010	< 0.002 (0.002)		
Total BTEX		< 0.001 (0.001)		ND

This report summary, and the entire report it represents, has been made for the exclusive and confidential use of KEI Consultants, Ltd. The interpretations and results expressed through this analytical report represent the best judgment of XENCO Laboratories. XENCO Laboratories, however, assumes no responsibility and makes no warranty to the end use of the data hereby presented.

Eddie L. Clemmons, III  
QA/QC Manager

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
ATTN: MR. JESSE TAYLOR  
P.O. BOX 4845  
MIDLAND, TEXAS 79704  
FAX: 915-520-4310

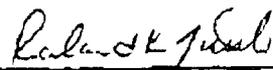
Sample Type: Water  
Sample Condition: Intact/Iced/HCl  
Project #: TNM 95-10  
Project Name: Saunders  
Project Location: Lea Co., N.M.

Sampling Date: See Below  
Receiving Date: 09/17/99  
Analysis Date: BTEX 9/17/99  
Analysis Date: DRO 9/27/99

ELT#	FIELD CODE/SAMPLE DATE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	mp-XYLENE (mg/L)	o-XYLENE (mg/L)	DRO >C10 C26 (mg/L)
20085	MW-1 9/16/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20086	MW-2 9/16/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20087	MW-3 9/16/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20088	MW-4 9/15/99	0.005	0.002	0.001	<0.001	0.001	<0.5
20089	MW-5 9/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20090	MW-6 9/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20091	MW-7 9/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20092	MW-8 9/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20093	MW-9 9/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
20094	MW-11 9/15/99	0.005	0.005	0.006	0.002	<0.001	0.8
20095	MW-12 9/15/99	0.002	0.004	0.005	<0.001	0.002	<0.5

% IA	101	95	98	95	84	100
% EA	94	90	91	90	89	107
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5

METHODS: EPA SW 846-8020, 5030, 8015M DRO

  
Raland K. Tuttle

9-30-99  
Date

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-1

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
09/20/95	39.86	3650.58	---	---
09/22/95	39.62	3650.82	---	---
10/03/95	40.78	3649.66	---	---
10/17/95	41.27	3649.17	---	---
12/08/95	42.61	3647.83	---	---
01/04/96	42.50	3647.94	---	---
01/25/96	42.90	3647.54	---	---
01/31/96	42.98	3647.46	---	---
02/23/96	43.03	3647.41	---	---
05/31/96	42.78	3647.66	---	---
06/02/96	42.64	3647.80	---	---
06/04/96	42.54	3647.90	---	---
06/17/96	42.96	3647.48	---	---
07/10/96	43.51	3646.93	---	---
10/02/96	44.14	3646.30	---	---
10/30/96	44.29	3646.15	---	---
02/10/97	44.56	3645.88	---	---
05/03/97	44.61	3645.83	---	---
05/07/97	44.72	3645.72	---	---
05/14/97	44.70	3645.74	---	---
05/28/97	44.74	3645.70	---	---
07/07/97	44.89	3645.55	---	---
08/26/97	45.04	3645.40	---	---
09/04/97	45.11	3645.33	---	---
10/06/97	45.21	3645.23	---	---
11/05/97	45.10	3645.34	---	---
12/03/97	45.22	3645.22	---	---
01/02/98	45.29	3645.15	---	---
02/07/98	45.29	3645.15	---	---
02/20/98	45.27	3645.17	---	---
03/06/98	45.20	3645.24	---	---
04/09/98	45.14	3645.30	---	---
05/19/98	45.05	3645.39	---	---
06/01/98	44.99	3645.45	---	---
07/01/98	44.98	3645.46	---	---
08/19/98	45.22	3645.22	---	---
09/11/98	45.21	3645.23	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-1**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
10/06/98	45.34	3645.10	---	---
11/23/98	45.37	3645.07	---	---
12/19/98	45.27	3645.17	---	---
01/02/99	45.24	3645.20	---	---
02/27/99	45.46	3644.98	---	---
03/10/99	45.20	3645.24	---	---
04/09/99	45.02	3645.42	---	---
05/19/99	44.29	3646.15	---	---

# GROUND WATER GAUGING SUMMARY

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-2**

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
09/20/95	39.87	3648.36	---	---
09/22/95	39.71	3648.52	---	---
10/03/95	39.52	3648.71	---	---
12/08/95	40.15	3648.08	---	---
01/04/96	40.88	3647.35	---	---
01/25/96	40.95	3647.28	---	---
01/31/96	41.28	3646.95	---	---
02/23/96	41.49	3646.74	---	---
05/31/96	41.90	3646.33	---	---
06/02/96	41.89	3646.34	---	---
06/04/96	41.71	3646.52	---	---
06/17/96	41.93	3646.30	---	---
07/10/96	42.20	3646.03	---	---
10/02/96	42.99	3645.24	---	---
02/10/97	42.99	3645.24	---	---
05/03/97	43.18	3645.05	---	---
05/07/97	43.19	3645.04	---	---
05/14/97	43.20	3645.03	---	---
05/28/97	43.23	3645.00	---	---
07/07/97	43.34	3644.89	---	---
08/26/97	43.48	3644.75	---	---
09/04/97	43.56	3644.67	---	---
10/06/97	43.69	3644.54	---	---
11/05/97	43.70	3644.53	---	---
12/03/97	43.67	3644.56	---	---
01/02/98	43.71	3644.52	---	---
02/07/98	43.74	3644.49	---	---
02/20/98	43.73	3644.50	---	---
03/06/98	43.70	3644.53	---	---
04/09/98	43.66	3644.57	---	---
05/19/98	43.63	3644.60	---	---
06/01/98	43.61	3644.62	---	---
07/01/98	43.58	3644.65	---	---
08/19/98	43.75	3644.48	---	---
09/11/98	43.73	3644.50	---	---
10/06/98	43.81	3644.42	---	---
11/23/98	43.85	3644.38	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-2**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
12/19/98	43.81	3644.42	---	---
01/02/99	43.80	3644.43	---	---
02/27/99	43.35	3644.88	---	---
03/10/99	43.78	3644.45	---	---
04/09/99	43.79	3644.44	---	---
05/19/99	43.56	3644.67	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-3

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
09/20/95	40.42	3647.61	---	---
09/22/95	40.26	3647.77	---	---
10/03/95	40.01	3648.02	---	---
12/08/95	40.67	3647.36	---	---
01/04/96	41.29	3646.74	---	---
01/25/96	41.41	3646.62	---	---
02/23/96	41.57	3646.46	---	---
05/31/96	41.54	3646.49	---	---
06/02/96	41.52	3646.51	---	---
06/04/96	41.85	3646.18	---	---
06/17/96	41.58	3646.45	---	---
07/10/96	42.03	3646.00	---	---
10/02/96	42.20	3645.83	---	---
02/10/97	42.67	3645.36	---	---
05/03/97	42.83	3645.20	---	---
05/07/97	42.84	3645.19	---	---
05/14/97	42.86	3645.17	---	---
05/28/97	42.90	3645.13	---	---
07/07/97	43.06	3644.97	---	---
08/26/97	43.17	3644.86	---	---
09/04/97	43.31	3644.72	---	---
10/06/97	43.34	3644.69	---	---
11/05/97	43.31	3644.72	---	---
12/03/97	43.34	3644.69	---	---
01/02/98	43.37	3644.66	---	---
02/07/98	43.37	3644.66	---	---
02/20/98	43.35	3644.68	---	---
03/06/98	43.29	3644.74	---	---
04/09/98	43.23	3644.80	---	---
05/19/98	43.17	3644.86	---	---
06/01/98	43.14	3644.89	---	---
07/01/98	43.13	3644.90	---	---
08/19/98	43.32	3644.71	---	---
09/11/98	43.28	3644.75	---	---
10/06/98	43.40	3644.63	---	---
11/23/98	43.39	3644.64	---	---
12/19/98	43.37	3644.66	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-3**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
01/02/99	43.35	3644.68	---	---
02/27/99	43.39	3644.64	---	---
03/10/99	43.31	3644.72	---	---
04/09/99	43.29	3644.74	---	---
05/19/99	43.04	3644.99	---	---

# GROUND WATER GAUGING SUMMARY

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-4**

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
12/08/95	40.60	3647.47	---	---
01/04/96	40.83	3647.24	---	---
01/25/96	40.89	3647.18	---	---
02/23/96	41.17	3646.90	---	---
05/31/96	41.23	3646.84	---	---
06/02/96	41.21	3646.86	---	---
06/04/96	41.16	3646.91	---	---
06/17/96	41.33	3646.74	---	---
07/10/96	41.58	3646.49	---	---
10/02/96	42.10	3645.97	---	---
10/30/96	42.24	3645.83	---	---
02/10/97	42.57	3645.50	---	---
05/03/97	42.73	3645.34	---	---
05/07/97	42.73	3645.34	---	---
05/14/97	42.74	3645.33	---	---
05/28/97	42.78	3645.29	---	---
07/07/97	43.91	3644.16	---	---
08/26/97	43.06	3645.01	---	---
09/04/97	43.09	3644.98	---	---
10/06/97	43.13	3644.94	---	---
11/05/97	43.15	3644.92	---	---
12/03/97	43.24	3644.83	---	---
01/02/98	43.29	3644.78	---	---
02/07/98	43.30	3644.77	---	---
02/20/98	43.29	3644.78	---	---
03/06/98	43.24	3644.83	---	---
04/09/98	43.18	3644.89	---	---
05/19/98	43.12	3644.95	---	---
06/01/98	43.09	3644.98	---	---
07/01/98	43.05	3645.02	---	---
08/19/98	43.14	3644.93	---	---
09/11/98	43.22	3644.85	---	---
10/06/98	43.44	3644.63	---	---
11/23/98	43.31	3644.76	---	---
12/19/98	43.32	3644.75	---	---
01/02/99	43.30	3644.77	---	---
02/27/99	43.41	3644.66	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-4**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
03/10/99	43.26	3644.81	---	---
04/09/99	43.69	3644.38	---	---
05/19/99	43.04	3645.03	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-5

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/04/96	43.60	3647.68	---	---
01/25/96	43.74	3647.54	---	---
02/23/96	44.12	3647.16	---	---
05/31/96	43.52	3647.76	---	---
06/02/96	43.44	3647.84	---	---
06/04/96	43.35	3647.93	---	---
06/17/96	43.78	3647.50	---	---
07/10/96	44.35	3646.93	---	---
10/02/96	44.98	3646.30	---	---
10/30/96	45.12	3646.16	---	---
02/10/97	45.39	3645.89	---	---
05/03/97	45.50	3645.78	---	---
05/07/97	45.48	3645.80	---	---
05/14/97	45.50	3645.78	---	---
05/28/97	45.55	3645.73	---	---
07/07/97	45.71	3645.57	---	---
08/26/97	45.88	3645.40	---	---
09/04/97	45.93	3645.35	---	---
10/06/97	45.94	3645.34	---	---
11/05/97	45.63	3645.65	---	---
12/03/97	46.05	3645.23	---	---
01/02/98	46.13	3645.15	---	---
02/07/98	46.11	3645.17	---	---
02/20/98	46.18	3645.10	---	---
03/06/98	45.96	3645.32	---	---
04/09/98	45.94	3645.34	---	---
05/19/98	45.84	3645.44	---	---
06/01/98	45.78	3645.50	---	---
07/01/98	44.77	3646.51	---	---
08/19/98	45.90	3645.38	---	---
09/11/98	46.02	3645.26	---	---
10/06/98	46.16	3645.12	---	---
11/23/98	46.11	3645.17	---	---
12/19/98	46.08	3645.20	---	---
01/02/99	46.06	3645.22	---	---
02/27/99	46.25	3645.03	---	---
03/10/99	46.02	3645.26	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-5**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
04/09/99	45.78	3645.50	---	---
05/19/99	45.06	3646.22	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-6

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/04/96	44.18	3647.63	---	---
01/25/96	44.30	3647.51	---	---
02/23/96	44.58	3647.23	---	---
05/31/96	44.14	3647.67	---	---
06/02/96	44.07	3647.74	---	---
06/04/96	44.02	3647.79	---	---
06/17/96	44.44	3647.37	---	---
07/10/96	44.94	3646.87	---	---
10/02/96	45.56	3646.25	---	---
10/30/96	45.70	3646.11	---	---
02/10/97	45.94	3645.87	---	---
05/03/97	46.04	3645.77	---	---
05/07/97	46.04	3645.77	---	---
05/14/97	46.06	3645.75	---	---
05/28/97	46.10	3645.71	---	---
07/07/97	46.28	3645.53	---	---
08/26/97	46.47	3645.34	---	---
09/04/97	46.50	3645.31	---	---
10/06/97	46.50	3645.31	---	---
11/05/97	46.52	3645.29	---	---
12/03/97	46.61	3645.20	---	---
01/02/98	46.68	3645.13	---	---
02/07/98	46.65	3645.16	---	---
02/20/98	46.61	3645.20	---	---
03/06/98	46.54	3645.27	---	---
04/09/98	46.45	3645.36	---	---
05/19/98	46.35	3645.46	---	---
06/01/98	46.26	3645.55	---	---
07/01/98	46.27	3645.54	---	---
08/19/98	46.40	3645.41	---	---
09/11/98	46.33	3645.48	---	---
10/06/98	46.68	3645.13	---	---
11/23/98	46.59	3645.22	---	---
12/19/98	46.56	3645.25	---	---
01/02/99	46.56	3645.25	---	---
02/27/99	46.67	3645.14	---	---
03/10/99	46.47	3645.34	---	---

**GROUND WATER GAUGING SUMMARY**

**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-6**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
04/09/99	46.26	3645.55	---	---
05/19/99	45.62	3646.19	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-7

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/04/96	43.86	3647.62	---	---
01/25/96	43.97	3647.51	---	---
02/23/96	44.20	3647.28	---	---
05/31/96	44.03	3647.45	---	---
06/02/96	43.98	3647.50	---	---
06/04/96	43.92	3647.56	---	---
06/17/96	44.26	3647.22	---	---
07/10/96	44.68	3646.80	---	---
10/02/96	45.28	3646.20	---	---
10/30/96	45.42	3646.06	---	---
02/10/97	45.64	3645.84	---	---
05/03/97	45.74	3645.74	---	---
05/07/97	45.73	3645.75	---	---
05/14/97	45.76	3645.72	---	---
05/28/97	45.82	3645.66	---	---
07/07/97	46.00	3645.48	---	---
08/26/97	46.19	3645.29	---	---
09/04/97	46.23	3645.25	---	---
10/06/97	46.20	3645.28	---	---
11/05/97	46.23	3645.25	---	---
12/03/97	46.34	3645.14	---	---
01/02/98	46.40	3645.08	---	---
02/07/98	46.33	3645.15	---	---
02/20/98	46.30	3645.18	---	---
03/06/98	46.22	3645.26	---	---
04/09/98	46.14	3645.34	---	---
05/19/98	46.03	3645.45	---	---
06/01/98	45.96	3645.52	---	---
07/01/98	45.95	3645.53	---	---
08/19/98	46.09	3645.39	---	---
09/11/98	46.23	3645.25	---	---
10/06/98	46.38	3645.10	---	---
11/23/98	46.27	3645.21	---	---
12/19/98	46.24	3645.24	---	---
01/02/99	46.21	3645.27	---	---
02/27/99	46.31	3645.17	---	---
03/10/99	46.12	3645.36	---	---

  
**GROUND WATER GAUGING SUMMARY**  


**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-7**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
04/09/99	45.95	3645.53	---	---
05/19/99	45.41	3646.07	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-8

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/04/96	44.47	3647.56	---	---
01/25/96	44.58	3647.45	---	---
02/23/96	44.70	3647.33	---	---
05/31/96	44.93	3647.10	---	---
06/02/96	44.96	3647.07	---	---
06/04/96	44.90	3647.13	---	---
06/17/96	45.13	3646.90	---	---
07/10/96	45.38	3646.65	---	---
10/02/96	45.96	3646.07	---	---
10/30/96	46.07	3645.96	---	---
02/10/97	46.26	3645.77	---	---
05/03/97	46.35	3645.68	---	---
05/07/97	46.35	3645.68	---	---
05/14/97	46.38	3645.65	---	---
05/28/97	46.44	3645.59	---	---
07/07/97	45.71	3646.32	---	---
08/26/97	46.83	3645.20	---	---
09/04/97	46.87	3645.16	---	---
10/06/97	46.81	3645.22	---	---
11/05/97	46.85	3645.18	---	---
12/03/97	46.96	3645.07	---	---
01/02/98	46.98	3645.05	---	---
02/07/98	46.90	3645.13	---	---
02/20/98	46.86	3645.17	---	---
03/06/98	46.76	3645.27	---	---
04/09/98	46.67	3645.36	---	---
05/19/98	46.54	3645.49	---	---
06/01/98	46.49	3645.54	---	---
07/01/98	46.48	3645.55	---	---
08/19/98	46.61	3645.42	---	---
09/11/98	46.76	3645.27	---	---
10/06/98	46.93	3645.10	---	---
11/23/98	46.83	3645.20	---	---
12/19/98	46.79	3645.24	---	---
01/02/99	46.74	3645.29	---	---
02/27/99	46.75	3645.28	---	---
03/10/99	46.60	3645.43	---	---

  
**GROUND WATER GAUGING SUMMARY**  


SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-8

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
04/09/99	46.56	3645.47	---	---
05/19/99	46.17	3645.86	---	---




## GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-9

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/04/96	42.59	3647.71	---	---
01/25/96	42.76	3647.54	---	---
02/23/96	43.81	3646.49	---	---
05/31/96	43.03	3647.27	---	---
06/02/96	42.96	3647.34	---	---
06/04/96	42.82	3647.48	---	---
06/17/96	43.08	3647.22	---	---
07/10/96	43.45	3646.85	---	---
10/02/96	44.01	3646.29	---	---
10/30/96	44.15	3646.15	---	---
02/10/97	44.46	3645.84	---	---
05/03/97	44.61	3645.69	---	---
05/07/97	44.55	3645.75	---	---
05/14/97	44.60	3645.70	---	---
05/28/97	44.64	3645.66	---	---
07/07/97	44.78	3645.52	---	---
08/26/97	44.93	3645.37	---	---
09/04/97	44.95	3645.35	---	---
10/06/97	44.99	3645.31	---	---
11/05/97	45.00	3645.30	---	---
12/03/97	45.12	3645.18	---	---
01/02/98	45.19	3645.11	---	---
02/07/98	45.20	3645.10	---	---
02/20/98	45.19	3645.11	---	---
03/06/98	45.11	3645.19	---	---
04/09/98	45.06	3645.24	---	---
05/19/98	45.00	3645.30	---	---
06/01/98	44.96	3645.34	---	---
07/01/98	44.96	3645.34	---	---
08/19/98	45.05	3645.25	---	---
09/11/98	45.14	3645.16	---	---
10/06/98	45.24	3645.06	---	---
11/23/98	45.23	3645.07	---	---
12/19/98	45.23	3645.07	---	---
01/02/99	45.20	3645.10	---	---
02/27/99	45.35	3644.95	---	---
03/10/99	45.39	3644.91	---	---

  
**GROUND WATER GAUGING SUMMARY**  


SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-9

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
04/09/99	45.09	3645.21	---	---
05/19/99	44.44	3645.86	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-10

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/31/96	41.62	3646.71	---	---
02/23/96	41.66	3646.67	---	---
05/31/96	41.46	3646.87	---	---
06/02/96	41.44	3646.89	---	---
06/04/96	41.38	3646.95	---	---
06/17/96	41.59	3646.74	---	---
07/10/96	41.84	3646.49	---	---
10/02/96	42.36	3645.97	---	---
10/30/96	42.51	3645.82	---	---
02/10/97	42.84	3645.49	---	---
05/03/97	43.01	3645.32	---	---
05/07/97	43.00	3645.33	---	---
05/14/97	43.00	3645.33	---	---
05/28/97	43.04	3645.29	---	---
07/07/97	43.17	3645.16	---	---
08/26/97	43.33	3645.00	---	---
09/04/97	43.35	3644.98	---	---
10/06/97	43.39	3644.94	---	---
11/05/97	43.42	3644.91	---	---
12/03/97	43.51	3644.82	---	---
01/02/98	43.56	3644.77	---	---
02/07/98	43.58	3644.75	---	---
02/20/98	43.57	3644.76	---	---
03/06/98	43.50	3644.83	---	---
04/09/98	43.47	3644.86	---	---
05/19/98	43.45	3644.88	---	---
06/01/98	43.36	3644.97	---	---
07/01/98	43.33	3645.00	---	---
08/19/98	43.43	3644.90	---	---
09/11/98	43.51	3644.82	---	---
10/06/98	43.63	3644.70	---	---
11/23/98	43.61	3644.72	---	---
12/19/98	43.60	3644.73	---	---
01/02/99	43.58	3644.75	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-11

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/31/96	42.71	3646.40	---	---
02/23/96	42.74	3646.37	---	---
05/31/96	42.11	3647.00	---	---
06/02/96	42.09	3647.02	---	---
06/04/96	42.04	3647.07	---	---
06/17/96	42.27	3646.84	---	---
07/10/96	42.58	3646.53	---	---
10/02/96	43.12	3645.99	---	---
10/30/96	43.26	3645.85	---	---
02/10/97	43.58	3645.53	---	---
05/03/97	43.75	3645.36	---	---
05/07/97	43.74	3645.37	---	---
05/14/97	43.76	3645.35	---	---
05/28/97	43.80	3645.31	---	---
07/07/97	43.92	3645.19	---	---
08/26/97	44.07	3645.04	---	---
09/04/97	44.10	3645.01	---	---
10/06/97	44.14	3644.97	---	---
11/05/97	44.17	3644.94	---	---
12/03/97	44.26	3644.85	---	---
01/02/98	44.32	3644.79	---	---
02/07/98	44.34	3644.77	---	---
02/20/98	44.32	3644.79	---	---
03/06/98	44.26	3644.85	---	---
04/09/98	44.21	3644.90	---	---
05/19/98	44.14	3644.97	---	---
06/01/98	44.10	3645.01	---	---
07/01/98	44.08	3645.03	---	---
08/19/98	44.17	3644.94	---	---
09/11/98	44.27	3644.84	---	---
10/06/98	44.35	3644.76	---	---
11/23/98	44.36	3644.75	---	---
12/19/98	44.34	3644.77	---	---
01/02/99	44.33	3644.78	---	---
02/27/99	44.49	3644.62	---	---
03/10/99	44.29	3644.82	---	---
04/09/99	44.93	3644.18	---	---

  
**GROUND WATER GAUGING SUMMARY**  


SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-11

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
05/19/99	44.02	3645.09	---	---

# GROUND WATER GAUGING SUMMARY

SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-12

DATE MEASURED	DEPTH TO WATER FROM PVC (feet)	ELEVATION OF WATER (feet)		PSH THICKNESS (feet)
		Actual	Corrected	
01/31/96	42.17	3646.99	---	---
02/23/96	42.25	3646.91	---	---
05/31/96	42.01	3647.15	---	---
06/02/96	41.97	3647.19	---	---
06/04/96	41.91	3647.25	---	---
06/17/96	42.27	3646.89	---	---
07/10/96	42.58	3646.58	---	---
10/02/96	43.13	3646.03	---	---
10/30/96	43.28	3645.88	---	---
02/10/97	43.58	3645.58	---	---
05/03/97	43.74	3645.42	---	---
05/07/97	43.72	3645.44	---	---
05/14/97	43.74	3645.42	---	---
05/28/97	43.92	3645.24	---	---
07/07/97	43.91	3645.25	---	---
08/26/97	44.06	3645.10	---	---
09/04/97	44.09	3645.07	---	---
10/06/97	44.13	3645.03	---	---
11/05/97	44.15	3645.01	---	---
12/03/97	44.24	3644.92	---	---
01/02/98	44.31	3644.85	---	---
02/07/98	44.33	3644.83	---	---
02/20/98	44.30	3644.86	---	---
03/06/98	44.25	3644.91	---	---
04/09/98	44.19	3644.97	---	---
05/19/98	44.15	3645.01	---	---
06/01/98	44.09	3645.07	---	---
07/01/98	44.06	3645.10	---	---
08/19/98	44.18	3644.98	---	---
09/11/98	44.27	3644.89	---	---
10/06/98	44.36	3644.80	---	---
11/23/98	44.35	3644.81	---	---
12/19/98	44.34	3644.82	---	---
01/02/99	44.32	3644.84	---	---
02/27/99	44.53	3644.63	---	---
03/10/99	44.29	3644.87	---	---
04/09/99	44.92	3644.24	---	---

  
**GROUND WATER GAUGING SUMMARY**  


**SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95)  
LEA COUNTY, NEW MEXICO  
MONITORING WELL MW-12**

DATE	DEPTH TO WATER FROM PVC	ELEVATION OF WATER (feet)		PSH THICKNESS
05/19/99	44.01	3645.15	---	---

TABLE 1

~~1999~~ ~~THIRD QUARTER~~ GROUNDWATER MONITORING RESULTS  
 SAUNDERS SITE, TNM 95-10  
 LEA CO., NM  
 ETGI PROJECT # EOT1015C

SAMPLE	SAMPLE DATE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	mp-XYLENE (mg/L)	o-XYLENE (mg/L)	DRO >C10-C28 (mg/L)
MW-1	<del>09/16/99</del>	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-2	09/16/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-3	09/16/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-4	09/15/99	0.005	0.002	0.001	<0.001	0.001	<0.5
MW-5	09/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-6	09/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-7	09/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-8	09/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-9	09/15/99	<0.001	<0.001	<0.001	<0.001	<0.001	<0.5
MW-11	09/15/99	0.005	0.005	0.006	0.002	<0.001	0.8
MW-12	09/15/99	0.002	0.004	0.005	<0.001	0.002	<0.5

Methods: BTEX - EPA SW 846-8020/5030 and TPH - 8015M DRO



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-274-520-705**

Ms. Lennah Frost  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
5805 E. Business 20  
Midland, Texas 79702

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

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has 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.

A June 17, 1999 OCD inspection of the site shows that oily contaminated soils remain in the western wall of the excavation near the water table elevation (see attached inspection report). It is not clear whether these remaining contaminated soils are a result of the EOTT pipeline spill or the prior identified Texaco unlined pit. In addition, EOTT has not provided the OCD with the results of ground water quality monitoring from monitoring wells at the site. Therefore, the OCD denies approval of the above referenced closure request at this time. The OCD requires that EOTT provide the OCD with a ground water monitoring report on the site which contains:

1. Tables of the results of all past and present ground quality monitoring and the laboratory results of all samples not previously submitted to the OCD.
2. Site maps which show the locations of the spill, the former pit and direction and magnitude of the hydraulic gradient at the site.

The above required information shall be submitted to the OCD Santa Fe District Office by October 29, 1999 with a copy provided to the OCD Hobbs District Office. The OCD will reconsider approval of the closure request once this data is submitted and Texaco provides the OCD with information on the extent of contamination related to Texaco's former pit.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'William C. Olson', written in a cursive style.

William C. Olson  
Hydrologist  
Environmental Bureau

attachment

xc w/attachment: Chris Williams, OCD Hobbs District Office  
Rodney Bailey, Texaco Exploration and Production, Inc.



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

To: Bill Olson, NMOCD Environmental Bureau

From: Wayne Price, NMOCD Environmental Bureau

Date: 6/17/99

RE: **Tex-New Mexico Pipeline Saunders pit:**

Inspected Tex-NM & Texaco Pit (Saunders) on 6/17/99 and took the following pictures. There is remaining oily saturated soils. It appears it migrates from the original leak site.

Picture #1 Looking south-southwest, groundwater exposed and capillary fringe saturated with oil.



Picture #2 same as above.



Picture #3 West wall oil saturated soil.



To: Bill Olson

From: Wayne Price

Inspected Tex-NM & Texaco Pit (Saunders) on 6/17/99. There is remaining oily saturated soils. It appears it migrates from the original leak site.

Date: 6/17/99 Pictures Taken by Wayne Price-OCD  
Tex-New Mexico Pipeline Saunders pit:

- #1 Looking south-southwest groundwater exposed and capillary fringe saturated with oil.



Picture #2 same as above.

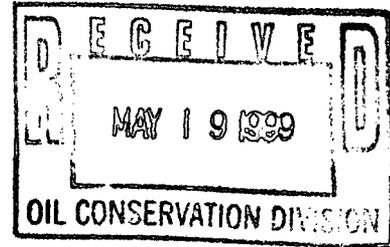


Picture #3 West wall oil saturated soil.



# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660  
5805 E. BUSINESS 20  
MIDLAND, TEXAS 79702  
(915) 687-2040



BY CERTIFIED MAIL

May 17, 1999

State of New Mexico  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505  
Attn: William Olson

RE: Saunders Excavation/TNM-95-10  
Closure Request  
Formerly Texas New Mexico Pipeline

Dear Mr. Olson:

Attached please find analytical results on both soil and water samples taken at the above captioned pipeline leak site. Also attached is a site map showing locations of each sample.

As you can see from the analysis, TPH concentrations from soils at the leaksite are well below the 100 ppm level as required by the State of New OCD guidelines and BTEX levels are also below required levels. Water samples taken from the site show no free phase hydrocarbons and BTEX levels are below required levels. A sample of rainwater was taken from the bottom hole, analysis attached, showing no contamination.

Based on the attached analyses, EOTT requests closure on this site. We believe that contamination generated by Texas New Mexico Pipeline has been removed and that any further contamination is coming from the Texaco side of the site.

If you have any questions or need additional information, please don't hesitate to call me at 915/684-3467.

Sincerely,

A handwritten signature in cursive script that reads "Lennah Frost".

Lennah Frost  
Sr. Environmental Engineer

cc: Al Hugh - Environmental File

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI  
ATTN: THERESA NIX  
5309 WURZBACH, STE. 100  
SAN ANTONIO, TEXAS 78238  
FAX: 512-384-3558  
FAX: 915-682-4182  
FAX: 505-397-5125

Receiving Date: 04/13/99

Sample Type: Soil

Project #: 810062-1-0

Project Name: Saunders

Project Location: Lee County, NM

Analysis Date: 04/13/99

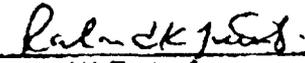
Sampling Date: 04/13/99

Sample Condition: Intact/loose

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	DRO C10-C28 mg/kg
17584	Section 1	<0.100	<0.100	<0.100	<0.100	<0.100	<10
17595	Section 3	<0.100	<0.100	<0.100	<0.100	<0.100	<10

% IA	103	100	98	97	98	114
% EA	101	94	91	92	95	88
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100	<10

METHODS: SW 846-8020,8015M

  
Roland K. Tuttle

4-14-99  
Date



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI  
ATTN: MR. STAS GROVER  
5309 WURZBACH, STE. 100  
SAN ANTONIO, TEXAS 78238  
FAX: 210-680-3763

Receiving Date: 04/28/99  
Sample Type: Soil  
Project #: 610062-1-0  
Project Name: Saunders  
Project Location: Lea County, NM

Analysis date: TPH 04/29/99  
Analysis Date: BTEX 04/28/99  
Sampling Date: 04/28/99  
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	DRO C10-C28 mg/kg
17732	Section 2	<0.100	<0.100	<0.100	<0.100	<0.100	24
17733	Section 4	<0.100	<0.100	<0.100	<0.100	<0.100	<10

% IA	93	89	89	93	93	87
% EA	103	93	86	86	89	88
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100	<10

METHODS: SW 846-8020.8015M

Roland K Tuttle  
Roland K. Tuttle

4-29-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI  
ATTN: THERESA NIX  
5309 WURZBACH SUITE 100  
SAN ANTONIO, TEXAS 78238  
FAX: 512-364-3538  
FAX: 915-882-4182  
FAX: 505-387-5125

Receiving Date: 04/05/99  
Sample Type: Soil  
Project #: 610062-1-0 Saunders  
Project Name: None Given  
Project Location: Lea Co., N.M.

Analysis Date: 04/06/99  
Sampling Date: 04/05/98  
Sample Condition: Intact/Load

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
17461	East Wall #3	<0.100	<0.100	<0.100	<0.100	<0.100
17462	East Wall #1	<0.100	<0.100	<0.100	<0.100	<0.100
17463	South Wall - West	<0.100	<0.100	<0.100	<0.100	<0.100
17464	South Wall - East	<0.100	<0.100	<0.100	<0.100	<0.100
17465	North East 1	<0.100	<0.100	<0.100	<0.100	<0.100

% IA	101	97	97	96	96
% EA	101	98	95	94	96
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8020, 5030

Raland K. Tuttle  
Raland K. Tuttle

4-7-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

KEI  
ATTN: THERESA NIX  
5309 WURZBACH SUITE 100  
SAN ANTONIO, TEXAS 78238  
FAX: 512-384-3558  
FAX: 915-682-4182  
FAX: 505-317-5125

Receiving Date: 04/05/99  
Sample Type: Soil  
Project #: 810082-1-0 Saunders  
Project Location: Lea County, N.M.

Analysis Date: 04/05/99  
Sampling Date: 04/05/99  
Sample Condition: Intact/loose

ELT#	FIELD CODE	TPH (DRO)
		C10-C28 mg/kg
17461	East Wall #3	12
17462	East Wall #1	<10
17463	South Wall - West	<10
17464	South Wall - East	<10
17465	North East 1	<10

%INSTRUMENT ACCURACY 108  
% EXTRACTION ACCURACY 98  
BLANK <10  
RPD 4

METHODS: SW 846- 8015m DRO

Raland K Tuttle  
Raland K. Tuttle

4-6-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI  
ATTN: MR. STAS GROVER  
5309 WURZBACH, STE. 100  
SAN ANTONIO, TEXAS 78238  
FAX: 210-680-3763

Receiving Date: 04/28/99  
Sample Type: Soil  
Project #: 610062-1-0  
Project Name: Saunders  
Project Location: Lea County, NM

Analysis Date: 04/28/99  
Sampling Date: 04/28/99  
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
17730	North Wall Water	<0.001	<0.001	<0.001	<0.001	<0.001
17731	Section 4 Water	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	93	89	89	93	93
% EA	98	94	93	91	93
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8020

Roland K Tuttle  
Roland K. Tuttle

4-29-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI  
ATTN: THERESA NIX  
5309 WURZBACH SUITE 100  
SAN ANTONIO, TEXAS 78236  
FAX: 512-384-3558  
FAX: 915-682-4182  
FAX: 505-367-5125

Receiving Date: 04/05/99  
Sample Type: Water  
Project #: 810062-1-0 Saunders  
Project Name: None Given  
Project Location: Lea Co., N.M.

Analysis Date: 04/05/99  
Sampling Date: 04/05/99  
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
17465	South Wall-West-H2O	<0.001	0.022	0.038	0.080	0.025
17467	South Wall-East-H2O	0.004	0.001	<0.001	0.002	<0.001

% IA	102	99	97	97	88
% EA	100	97	97	91	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: SW 846-8020, 5030

Raland K Tuttle  
Raland K. Tuttle

4-6-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TOUY SAVOIE  
P.O. BOX 1030  
JAL NEW MEXICO 88252  
FAX: 505-395-2636  
FAX: 915-882-4182  
FAX: 505-397-5125  
FAX: 505-398-2754 (Bobby)

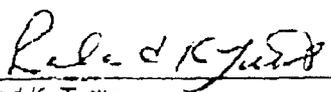
Receiving Date: 03/18/99  
Sample Type: Water  
Project #: TNM 95-10 Saunders  
Project Name: None Given  
Project Location: Monument N.M.

Analysis Date: 03/18/99  
Sampling Date: 03/18/99  
Sample Condition: Intactified

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
17274	Rainwater B.H.	<0.001	<0.001	<0.001	<0.001	<0.001

%A	105	100	98	98	99
%EA	107	1022	100	100	101
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8020.5030

  
Roland K. Tuttle

3-18-99  
Date

# TNM 95-10 Saunders

## SITE SKETCH

North Arrow ↑

Date April 5, 1999

Scale = 9.5 ft / square

Legend

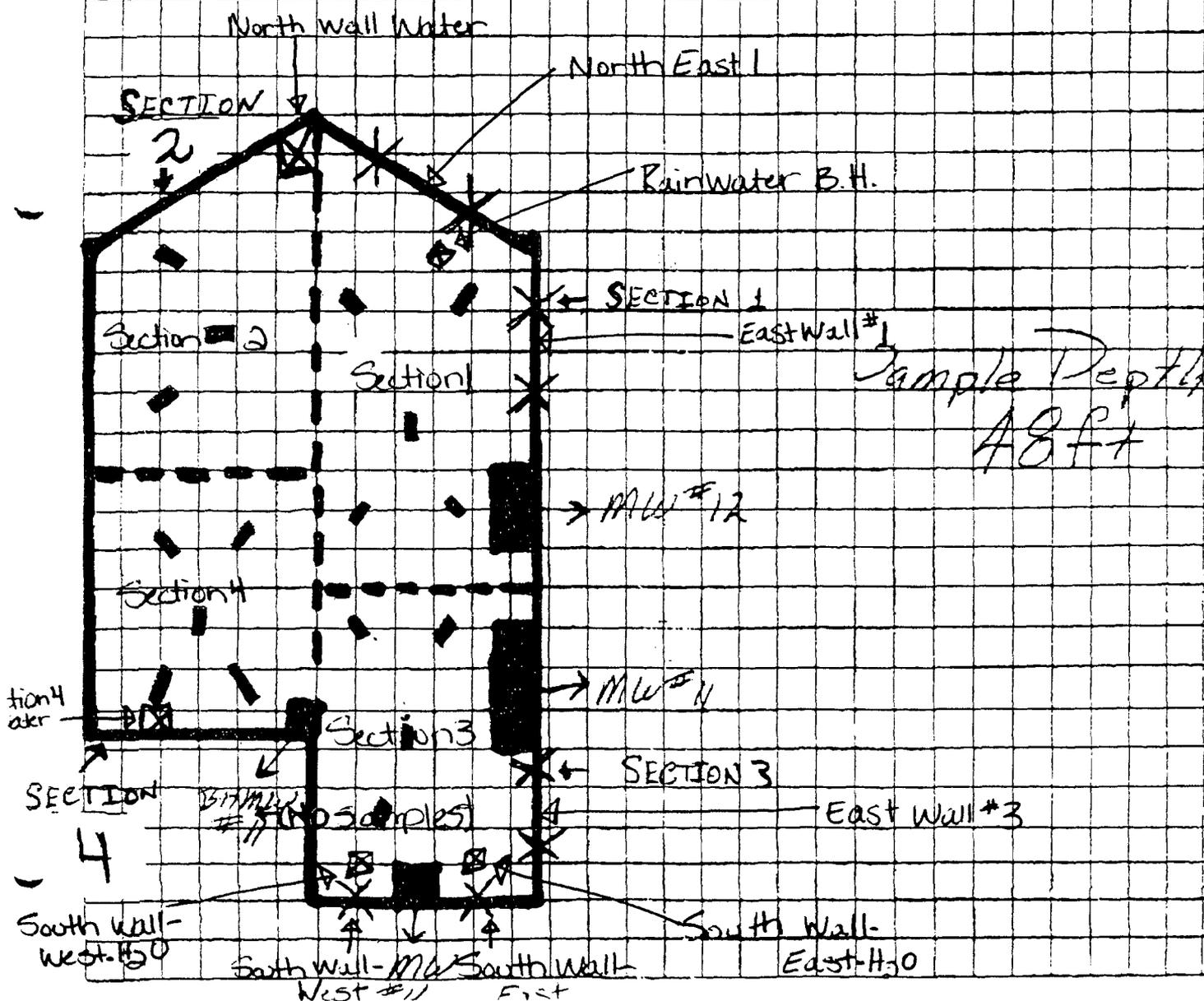
X = Sidewall

⊗ = Water Sample

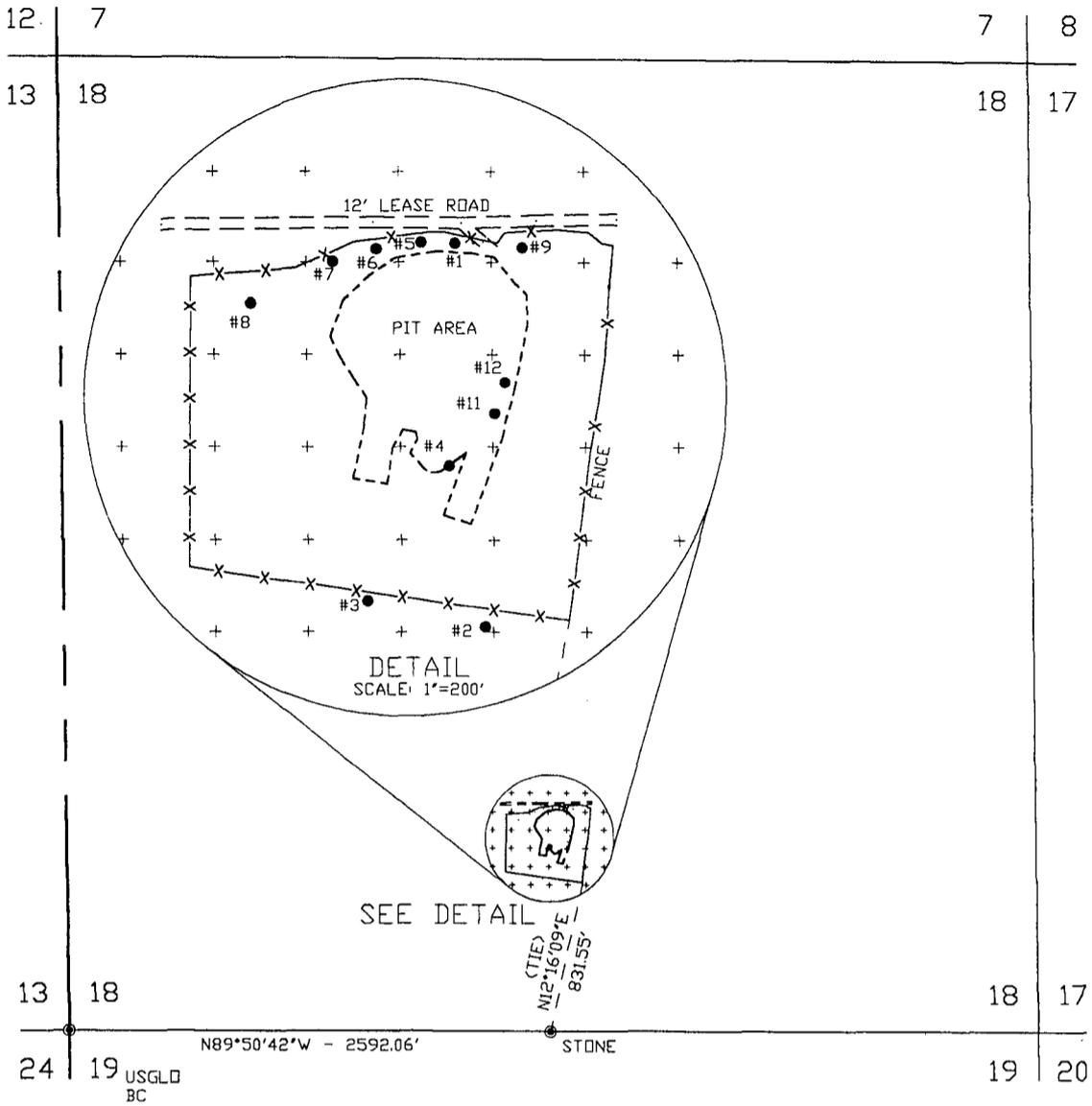
Bottom Hole Monitor Well (BHMW)

Monitor Well (MW)

■ = BOTTOM SAMPLING LOCATIONS (COMPOSITE)



SECTION 18, TOWNSHIP 19 SOUTH, RANGE 37 EAST, N.M.P.M.  
LEA COUNTY NEW MEXICO

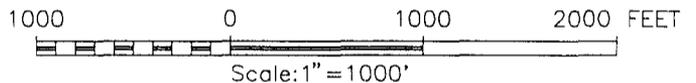


MONITOR WELL #	COORDINATE WELL #	ELEVATION
#1	Y=604148.8 X=862281.5	3687.48 NG 3687.37 CONC SLAB 3689.93 TOP 4' PVC
#2	Y=603733.7 X=862314.3	3684.93 NG 3685.11 CONC SLAB 3687.71 TOP 4' PVC
#3	Y=603762.6 X=862187.3	3684.61 NG 3684.89 CONC. SLAB 3687.50 TOP 4' PVC
#4	Y=603907.4 X=862275.3	3684.40 NG 3684.43 CONC SLAB 3687.57 TOP 2' PVC
#5	Y=604149.8 X=862244.9	3687.86 NG 3687.93 CONC SLAB 3690.79 TOP 2' PVC
#6	Y=604142.9 X=862196.6	3688.59 NG 3688.39 CONC SLAB 3691.32 TOP 2' PVC
#7	Y=604129.1 X=862149.5	3688.59 NG 3688.61 CONC SLAB 3690.99 TOP 2' PVC
#8	Y=604084.4 X=862061.8	3688.92 NG 3688.96 CONC SLAB 3691.56 TOP 2' PVC
#9	Y=604144.0 X=862354.3	3687.04 NG 3687.08 CONC SLAB 3689.81 TOP 2' PVC
#11	Y=603964.2 X=862324.7	3686.04 NG 3686.03 CONC SLAB 3688.62 TOP 2' PVC
#12	Y=603998.2 X=862335.4	3686.67 NG 3686.54 CONC SLAB 3688.67 TOP 2' PVC

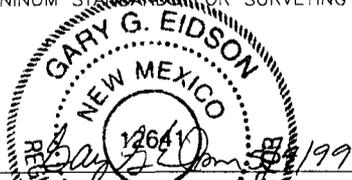
NOTES:

(1) COORDINATE VALUES SHOWN HEREON ARE TRANSVERSE MERCATOR GRID AND CONFORM TO THE NEW MEXICO COORDINATE SYSTEM 'NEW MEXICO EAST ZONE' NORTH AMERICAN DATUM OF 1983.

(2) ELEVATIONS ARE BASED ON GPS CONTROL POINT 'PIT', A 1/2" I.R. W/AC 'JWECD CP' BM. ELEV. =3689.29 AT Y=604129.04 X=862014.94



I HEREBY CERTIFY THAT I DIRECTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO.

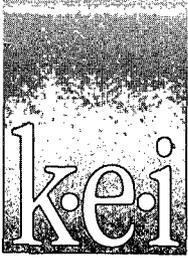


RONALD G. EIDSON, N.M. No. 3239  
GARY G. EIDSON, N.M. No. 12641  
JOHN ROBERT SURVEYING COMPANY  
412 N. DAL PASO AVENUE, NEW MEXICO - 505-393-3117

KEI JOB NO. 610062-1-0

MONITOR WELLS, PIT AREA & FENCE LINE  
AT THE SAUNDERS SITE IN SECTION 18,  
TOWNSHIP 19 SOUTH,  
RANGE 37 EAST, N.M.P.M.,  
LEA COUNTY, NEW MEXICO

Survey Date: 4/21/99	Sheet 1 of 1 Sheets
W.O. Number: 99-11-0356	Drawn By: D.McCARLEY
Date: 4/30/99 KEI	KEI0356 Scale: 1"=1000'



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX

MAY - 3 1999

EXCAVATION DIVISION

April 28, 1999

Mr. William C. Olson  
**OIL CONSERVATION DIVISION**  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: Saunders Excavation/TNM-95-10  
KEI Job No. 610062-1

Dear Mr. Olson:

This letter is written confirmation of your verbal approval to extend the May 1, 1999 deadline for submittal of a comprehensive remediation/investigation report for the above referenced site. Excavation activities are ongoing and a date has not been determined for completion. Texas - New Mexico Pipe Line Company (TNMPL) will contact your office in the near future with a projected completion date for excavation activities. At that time, a report deadline will be discussed.

Please call me at (210) 680-3767 if you have any questions.

Respectfully,

A handwritten signature in cursive script that reads "Theresa Nix". The signature is written in black ink and is positioned above the typed name and title.

Theresa Nix  
Project Manager

cc: Marc Oler

EQUILON PIPELINE COMPANY LLC

DATE: 3-19-99

NO. OF PAGES 3

TIME: 10:10 a.m. CDT

(INCLUDING COVER SHEET)

TO:

NAME:

Bill Olson

COMPANY:

N.M.O.C.D.

FAX NUMBER:

505-827-8177

FROM:

NAME:

John A. (Tony) Savoie

PHONE NUMBER:

915-686-5268

COMMENTS:

Verbal approval For Discharge

EQUILON PIPELINE COMPANY LLC  
P. O. BOX 1910  
MIDLAND, TX 79702

FAX NUMBER: 915/686-5284

*3/19/99 1000 hrs.  
Verbal approval to  
Tony Savoie  
Will Olson*

Bill,

Permission to Discharge aprox 6500 BLS  
of Rain water From EXCAVATION @ T11M-95-10  
Sect. 18, T 19 South, R 37 E Lea Co. N.M.  
water will Be dispersed Through a 4" Poly  
Line Filtered By Hay over an Area  
of State + Fee Land South of The Site  
A Sketch of The Area + Piping Used  
will Be Forwarded at Completion of Discharge

Analytical of water Attached

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL. NEW MEXICO 88252  
FAX: 505-395-2636  
FAX: 915-682-4182  
FAX: 505-397-5125  
FAX: 505-396-2754 (Bobby)

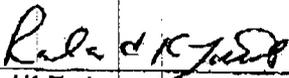
Receiving Date: 03/18/99  
Sample Type: Water  
Project #: TNM 95-10 Saunders  
Project Name: None Given  
Project Location: Monument, N.M.

Analysis Date: 03/18/99  
Sampling Date: 03/18/99  
Sample Condition: Intact/Iced

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
17274	Rainwater B.H.	<0.001	<0.001	<0.001	<0.001	<0.001

%IA	105	100	98	98	99
%EA	107	1022	100	100	101
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001

METHODS: EPA SW 846-8020.5030

  
\_\_\_\_\_  
Roland K. Tuttle

3-18-99  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1713



Marc C Oler  
Sr. Project Manager REM  
SH&E/Science and  
Engineering

RECEIVED

FEB 19 1999

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

February 16, 1999

Texaco Inc.  
Attn: John Aweeka  
P. O. Box 2100  
Denver, CO 80201-2100

Re: Saunders Excavation/TNM-10-95/Site 16  
KEI Job No. 610062

Dear Mr. Aweeka:

Texas - New Mexico Pipe Line Company (TNMPL) has received approval of the work plan submitted to remediate the TNMPL portion of the Saunders Excavation site. As we discussed on February 4, 1998, provided is a copy of the work plan and the Oil Conservation Division (OCD) approval letter. Excavation activities began February 8, 1999.

Because of the potential for joint future liability at this site, we would appreciate being provided with the details of TEPI's plan for remediation of their portion of the site, which constitutes the majority of the impacted soils. If possible, please provide any such plans to me for discussion.

If you have any questions please contact me at (303) 860-3457.

Respectfully,

Marc C. Oler  
Equiva Services, LLC

cc: J. Michael Hawthorne, KEI  
Roger Anderson, OCD  
Lance Tolson, Texaco

Attachment

jm\hp:\tnmp\610062\correspondence\ctepiwp.doc

1670 Broadway  
Denver, CO 80202-4899



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 26, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-274-520-601**

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

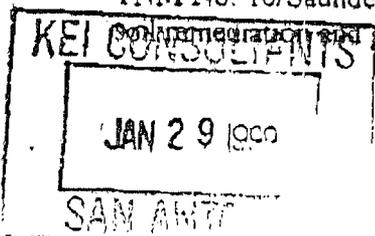
**RE: SOIL AND GROUND WATER CONTAMINATION**  
**TNM NO. 10/SAUNDERS SITE**

Dear Mr. Savoie:

The New Mexico Oil Conservation Division (OCD) has reviewed the following Texas-Mexico Pipe Line Company (TNMPLC) documents which were submitted on behalf of TNMPLC by their consultant KEI:

- December 28, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".
- October 29, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".
- September 10, 1998 "TNM-10-95, SAUNDERS EXCAVATION, MONUMENT, NEW MEXICO, KEI JOB NO. 610062-1".
- June 23, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".

These documents contain the results of TNMPLC's remediation and monitoring activities at the TNM No. 10/Saunders pipeline spill site. The documents also contain a work plan for additional remediation and ground water monitoring.



Mr. Tony Savoie  
January 26, 1999  
Page 2

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

1. TNMPLC will submit a comprehensive remediation/investigation report to the OCD by May 1, 1999. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
  - a. A description of all past and present investigation and remedial actions including discussion of the results as well as conclusions and recommendations.
  - b. Summary tables of all past and present soil/waste and water quality sampling results including copies of recent laboratory analytical data sheets and associated quality assurance/quality control (QA/QC) data. Laboratory analytical data sheets which have been previously submitted to the OCD need only be referenced and do not need to be included in the report.
  - c. A site map showing the location of all soil/waste sampling points, excavation confirmation samples, boreholes, monitor wells and all relevant site features such as pit locations and spill areas.
  - d. A ground water potentiometric map created using the water table elevations from all monitor wells. The map will show the direction and magnitude of the hydraulic gradient.
  - e. Geologic/lithologic logs and well completion diagrams for each borehole and monitor well.
  - f. Soil and ground water isopleth maps for contaminants of concern such as benzene, BTEX and any other significant contaminants found during the investigations.
  - g. The disposition of all investigation derived wastes.
  - h. A work plan for replacement of monitor wells destroyed during the excavation activities.
  - i. Any other pertinent information.
2. The OCD will not consider ground water remediation actions to be complete until ground water quality in from each monitoring well is below New Mexico Water Quality Control Commission (WQCC) standards for 4 consecutive quarters.
3. TNMPLC will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Mr. Tony Savoie  
January 26, 1999  
Page 3

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

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office  
Theresa Nix, KEI

September 10, 1998

Mr. William C. Olson  
**STATE OF NEW MEXICO**  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: TNM-10-95, Saunder's Excavation  
Monument, New Mexico  
Job No. 610062-1

Dear Mr. Olson:

This letter is in response to your letter dated August 26, 1998 requiring a remedial action work plan for remaining soil and ground water impact and a detailed ground water monitoring plan and reporting schedule.

Texas - New Mexico Pipe Line Company (TNMPL) has attempted to develop and implement a joint approach to the project with Texaco Exploration and Production Inc. (TEPI). As you may recall, a former TEPI pit at the site was encountered during initial release response activities. Mr. Tony Savoie of TNMPL communicated this intent by telephone to OCD prior to the April 1, 1997 deadline specified in your letter of February 20, 1997. However, at this time TNMPL plans to proceed with management of its portion of the site independently. A work plan specifying remedial actions to be performed is attached for your approval.

Please note one correction to your letter, which states that "no remedial actions are ongoing at this site." Phase separate hydrocarbon (PSH) removal has been conducted at this site since October of 1996, and is currently performed on a weekly basis.

Prior to implementation of the attached workplan, TNMPL proposes to continue the weekly PSH removal, monthly gauging, and quarterly sampling of those wells that do not exhibit phase separate hydrocarbon. An annual report of this data will be prepared and submitted to OCD. Following completion of the remediation activities specified in the attached workplan, which contemplates removal of source hydrocarbon, TNMPL proposes to perform one ground water sampling event to ensure dissolved phase hydrocarbon levels in ground water are below acceptable levels. Following receipt of OCD approval, TNMPL will then plug and abandon the monitoring wells at the site.

## REMEDIAL ACTION WORK PLAN

---

### WORK PERFORMED TO DATE

In June of 1995 a crude oil release from a subsurface pipeline operated by Texas - New Mexico Pipe Line Company (TNMPL) was discovered. Initial release response work was performed by Allstate Services Environmental under the direction of TNMPL. Subsurface investigations were initiated to delineate the extent and magnitude of hydrocarbon impact within soils and ground water and to characterize generated wastes. Investigations included soil boring installation to delineate impacted soils, monitoring well installation to assess ground water, and excavation operations to remove hydrocarbon impacted soils. Excavated soils are currently staged adjacent to the excavation.

In August of 1995 Texaco Exploration and Production Inc. (TEPI) contracted Environmental Spill Control, Inc. to begin pit closure operations to remove the hydrocarbon impacted soils from a former pit at the site in accordance with the New Mexico Oil Conservation Division (OCD) Unlined Surface Impoundment Closure Guidelines. Impacted soils from the former pit were removed to a depth of approximately 28 feet below the ground surface to a fractured sandstone layer approximately one to three feet thick. Removed impacted soils were segregated from TNMPL's previously excavated materials and staged on-site. Surface staining of the fractured sandstone was observed in an area below the former pit approximately 85 feet long and 40 feet wide. Analytical testing from samples collected from four soil borings in the sands below the sandstone layer indicated hydrocarbon concentrations ranging from 60 to 52,500 ppm. Additional soil excavation was performed to remove impacted soil from October 11 through December 7, 1995, exposing a limestone layer approximately 36 feet below the ground surface.

In December 1995 and January 1996, Environmental Spill Control, Inc. performed additional assessment activities to further evaluate hydrocarbon contamination in soils below the limestone layer, in soils adjacent to the excavation, and in ground water up gradient and down gradient of the former pit. Additional assessment activities were directed by TEPI and TNMPL. Analytical results from soil samples collected indicated that soils below the limestone layer at the floor of the excavation had been impacted by hydrocarbons, and soils below the excavation slopes were also impacted by hydrocarbons. Gauging of on-site temporary monitoring wells indicated that phase-separate hydrocarbon (PSH) is present below the excavation floor. Sampling of on-site wells indicated that dissolved concentrations of BTEX have ranged from non-detectable (ND) to 6.416 mg/l. Subsequent to excavation, a recovery trench was installed by TNMPL and operated in the bottom of the excavation from January through May of 1996. Total hydrocarbon recovery from the trench was approximately 15.72 barrels (bbls).

### CLOSURE STANDARDS

The New Mexico OCD Guidelines for Remediation of Leaks, Spills, and Releases contains the standard criteria for remediation activities. A ranking analysis for the site was performed to determine appropriate soil remediation levels. The ranking analysis is as follows:

Depth to Ground Water	Less Than 50 Feet	20 Points
Well Head Protection	Greater Than 1000 Feet to Water Source	0 Points
	Greater Than 200 Feet to Private Water Source	
Surface Water Body	Greater Than 1000 Feet	0 Points
<b>Total Ranking Score</b>		<b>20 Points</b>

Based on the total ranking score, the standard closure objectives for this site for concentrations of benzene, BTEX, and TPH are summarized below. As appropriate, a site specific risk assessment may be prepared in lieu of these standard closure levels to evaluate site specific concentrations which are protective of public health and the environment.

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	100

If ground water outside the area of excavation is impacted in excess of the New Mexico Water Quality Control Commission (WQCC) ground water standards, it will be addressed subsequent to the activities contemplated herein.

## SCOPE OF WORK

### SOIL

The high viscosity of the PSH, the nature of the soil matrix, and the depth to ground water at the site realistically preclude installation of a conventional PSH/ground water extraction system. Based on the information obtained from the site to date, excavation of impacted soils at the ground water interface and backfilling appears to be the most realistic closure alternative for the site. Soil conditions at the floor of the existing excavation are sands, very hard calcareous sand (caliche) and limestone. The scope of work includes the following items:

- Perform additional excavation at the current excavation floor to remove impacted soils and entrained PSH directly above and at the ground water interface.
- Stockpile excavated materials on-site.
- Place clean fill above the ground water interface.
- Backfill the excavation to its current elevation.

Currently in-place material below the existing excavation floor will be excavated to a depth of approximately 10 feet. Material below the existing floor consists primarily of granular soils and very hard cemented limestone. Staged materials will be evaluated for suitable management, and may be placed back into the excavation, landfarmed on-site, or landfarmed off-site depending on the soil analytical results and OCD requirements.

## **GROUND WATER**

PSH is currently hand bailed approximately weekly from temporary wells located in the bottom of the excavation. Ground water samples are collected from the on-site monitoring wells on a quarterly basis. Ground water laboratory results, updated ground water elevation tables, and updated ground water contour and PSH thickness maps are submitted quarterly after each event. The necessity for ground water remediation will be re-evaluated upon completion of excavation activities.

## **PROJECT SCHEDULE**

This workplan will be implemented within 45 days of receipt of approval from OCD for the activities identified in the plan.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 26, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: Z-274-520-601**

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 following Texas-Mexico Pipe Line Company (TNMPLC) documents which were submitted on behalf of TNMPLC by their consultant KEI:

- December 28, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".
- October 29, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".
- September 10, 1998 "TNM-10-95, SAUNDERS EXCAVATION, MONUMENT, NEW MEXICO, KEI JOB NO. 610062-1".
- June 23, 1998 "GROUND WATER MONITORING EVENT, TEXAS - NEW MEXICO PIPE LINE COMPANY, SITE 16 (AKA SAUNDERS EXCAVATION, TNM-10-95), LEA COUNTY, NEW MEXICO, KEI JOB NO. 610062-1".

These documents contain the results of TNMPLC's remediation and monitoring activities at the TNM No. 10/Saunders pipeline spill site. The documents also contain a work plan for additional soil remediation and ground water monitoring.

Mr. Tony Savoie  
January 26, 1999  
Page 2

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

1. TNMPLC will submit a comprehensive remediation/investigation report to the OCD by May 1, 1999. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
  - a. A description of all past and present investigation and remedial actions including discussion of the results as well as conclusions and recommendations.
  - b. Summary tables of all past and present soil/waste and water quality sampling results including copies of recent laboratory analytical data sheets and associated quality assurance/quality control (QA/QC) data. Laboratory analytical data sheets which have been previously submitted to the OCD need only be referenced and do not need to be included in the report.
  - c. A site map showing the location of all soil/waste sampling points, excavation confirmation samples, boreholes, monitor wells and all relevant site features such as pit locations and spill areas.
  - d. A ground water potentiometric map created using the water table elevations from all monitor wells. The map will show the direction and magnitude of the hydraulic gradient.
  - e. Geologic/lithologic logs and well completion diagrams for each borehole and monitor well.
  - f. Soil and ground water isopleth maps for contaminants of concern such as benzene, BTEX and any other significant contaminants found during the investigations.
  - g. The disposition of all investigation derived wastes.
  - h. A work plan for replacement of monitor wells destroyed during the excavation activities.
  - i. Any other pertinent information.
2. The OCD will not consider ground water remediation actions to be complete until ground water quality in from each monitoring well is below New Mexico Water Quality Control Commission (WQCC) standards for 4 consecutive quarters.
3. TNMPLC will notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Mr. Tony Savoie  
January 26, 1999  
Page 3

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

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office  
Theresa Nix, KEI

Z 274 520 601

US Postal Service	
<b>Receipt for Certified Mail</b>	
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PS Form 3800 April 1995



5309 Wurzbach, Suite 100  
 San Antonio, Texas 78238  
 (210) 680-3767  
 (210) 680-3763 FAX

December 28, 1998

Mr. Tony Savoie  
**TEXAS - NEW MEXICO PIPE LINE COMPANY**  
 P. O. Box 1030  
 Jal, New Mexico 88252

**RECEIVED**

**JAN 22 1999**

Re: Ground Water Monitoring Event  
 Texas - New Mexico Pipe Line Company  
 Site 16 (AKA Saunders Excavation, TNM-10-95)  
 Lea County, New Mexico  
 KEI Job No. 610062-1

ENVIRONMENTAL BUREAU  
 OIL CONSERVATION DIVISION

Dear Mr. Savoie:

Transmitted with this letter is the ground water binder update packet for the fourth quarter of 1998 ground water monitoring event conducted at Site 16, located in Lea County, New Mexico. One copy has been submitted to OCD Hobbs and OCD Santa Fe.

The packet contains the following:

- Updated gauging tables
- Updated ground water laboratory results tables
- Updated figures
- A copy of the laboratory ground water results and chain-of-custody documentation
- A dated "tab" for the new event

Please remove and replace the former tables. Add the new dated tab and place the updated figures, laboratory reports, and chain-of-custody documentation behind this tab.

Please call me at (210) 680-3767 if you have any questions or comments.

Respectfully,

Theresa Nix  
 Project Manager

Enclosure

cc: Marc Oler, Equilon  
 J. Michael Hawthorne, KEI  
 OCD Hobbs  
 OCD Santa Fe, William Olson ✓

*Filed in  
 GW Monitoring Report  
 Will Olson*



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX

October 29, 1998

Mr. Tony Savoie  
**TEXAS - NEW MEXICO PIPE LINE COMPANY**  
P. O. Box 1030  
Jal, New Mexico 88252

**RECEIVED**

**DEC 07 1998**

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Re: Ground Water Monitoring Event  
Texas - New Mexico Pipe Line Company  
Site 16 (AKA Saunders Excavation, TNM-10-95)  
Lea County, New Mexico  
KEI Job No. 610062-1

Dear Mr. Savoie:

Transmitted with this letter is the ground water binder update packet for the third quarter of 1998 ground water monitoring event conducted at Site 16, located in Lea County, New Mexico. One copy has been submitted to OCD Hobbs and OCD Santa Fe.

The packet contains the following:

- Revised Table of Contents
- Updated gauging tables and general notes
- Updated ground water laboratory results tables
- Updated figures
- A copy of the laboratory ground water results and chain-of-custody documentation
- A dated "tab" for the new event

Please remove and replace the former Table of Contents and tables. Add the new dated tab and place the updated figures, laboratory reports, and chain-of-custody documentation behind this tab.

Please call me at (210) 680-3767 if you have any questions or comments.

Respectfully,

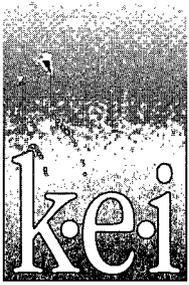
*Theresa Nix*

Theresa Nix  
Project Manager

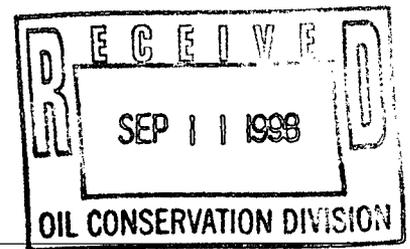
*Filed in  
GW Monitoring Report*

Enclosure

cc: Marc Oler, Equilon  
J. Michael Hawthorne, KEI  
OCD Hobbs  
OCD Santa Fe, William Olson ✓



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX



September 10, 1998

Mr. William C. Olson  
**STATE OF NEW MEXICO**  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: TNM-10-95, Saunder's Excavation  
Monument, New Mexico  
KEI Job No. 610062-1

Dear Mr. Olson:

This letter is in response to your letter dated August 26, 1998 requiring a remedial action work plan for remaining soil and ground water impact and a detailed ground water monitoring plan and reporting schedule.

Texas - New Mexico Pipe Line Company (TNMPL) has attempted to develop and implement a joint approach to the project with Texaco Exploration and Production Inc. (TEPI). As you may recall, a former TEPI pit at the site was encountered during initial release response activities. Mr. Tony Savoie of TNMPL communicated this intent by telephone to OCD prior to the April 1, 1997 deadline specified in your letter of February 20, 1997. However, at this time TNMPL plans to proceed with management of its portion of the site independently. A work plan specifying remedial actions to be performed is attached for your approval.

Please note one correction to your letter, which states that "no remedial actions are ongoing at this site." Phase separate hydrocarbon (PSH) removal has been conducted at this site since October of 1996, and is currently performed on a weekly basis.

Prior to implementation of the attached workplan, TNMPL proposes to continue the weekly PSH removal, monthly gauging, and quarterly sampling of those wells that do not exhibit phase separate hydrocarbon. An annual report of this data will be prepared and submitted to OCD. Following completion of the remediation activities specified in the attached workplan, which contemplates removal of source hydrocarbon, TNMPL proposes to perform one ground water sampling event to ensure dissolved phase hydrocarbon levels in ground water are below acceptable levels. Following receipt of OCD approval, TNMPL will then plug and abandon the monitoring wells at the site.

Please call me at (210) 680-3767 if you have any questions or need additional information.

Sincerely,



*for*

Theresa Nix  
Project Manager

Attachment

cc: Marc Oler, TTTI  
Tony Savoie, TNMPL  
Wayne Price, OCD Hobbs District Office

tin\p:\tnmpl\810062\workpln.doc

## WORK PERFORMED TO DATE

In June of 1995 a crude oil release from a subsurface pipeline operated by Texas - New Mexico Pipe Line Company (TNMPL) was discovered. Initial release response work was performed by Allstate Services Environmental under the direction of TNMPL. Subsurface investigations were initiated to delineate the extent and magnitude of hydrocarbon impact within soils and ground water and to characterize generated wastes. Investigations included soil boring installation to delineate impacted soils, monitoring well installation to assess ground water, and excavation operations to remove hydrocarbon impacted soils. Excavated soils are currently staged adjacent to the excavation.

In August of 1995 Texaco Exploration and Production Inc. (TEPI) contracted Environmental Spill Control, Inc. to begin pit closure operations to remove the hydrocarbon impacted soils from a former pit at the site in accordance with the New Mexico Oil Conservation Division (OCD) Unlined Surface Impoundment Closure Guidelines. Impacted soils from the former pit were removed to a depth of approximately 28 feet below the ground surface to a fractured sandstone layer approximately one to three feet thick. Removed impacted soils were segregated from TNMPL's previously excavated materials and staged on-site. Surface staining of the fractured sandstone was observed in an area below the former pit approximately 85 feet long and 40 feet wide. Analytical testing from samples collected from four soil borings in the sands below the sandstone layer indicated hydrocarbon concentrations ranging from 60 to 52,500 ppm. Additional soil excavation was performed to remove impacted soil from October 11 through December 7, 1995, exposing a limestone layer approximately 36 feet below the ground surface.

In December 1995 and January 1996, Environmental Spill Control, Inc. performed additional assessment activities to further evaluate hydrocarbon contamination in soils below the limestone layer, in soils adjacent to the excavation, and in ground water up gradient and down gradient of the former pit. Additional assessment activities were directed by TEPI and TNMPL. Analytical results from soil samples collected indicated that soils below the limestone layer at the floor of the excavation had been impacted by hydrocarbons, and soils below the excavation slopes were also impacted by hydrocarbons. Gauging of on-site temporary monitoring wells indicated that phase-separate hydrocarbon (PSH) is present below the excavation floor. Sampling of on-site wells indicated that dissolved concentrations of BTEX have ranged from non-detectable (ND) to 6.416 mg/l. Subsequent to excavation, a recovery trench was installed by TNMPL and operated in the bottom of the excavation from January through May of 1996. Total hydrocarbon recovery from the trench was approximately 15.72 barrels (bbls).

## CLOSURE STANDARDS

The New Mexico OCD Guidelines for Remediation of Leaks, Spills, and Releases contains the standard criteria for remediation activities. A ranking analysis for the site was performed to determine appropriate soil remediation levels. The ranking analysis is as follows:

Depth to Ground Water	Less Than 50 Feet	20 Points
Well Head Protection	Greater Than 1000 Feet to Water Source	0 Points
	Greater Than 200 Feet to Private Water Source	
Surface Water Body	Greater Than 1000 Feet	0 Points
	<b>Total Ranking Score</b>	<b>20 Points</b>

Based on the total ranking score, the standard closure objectives for this site for concentrations of benzene, BTEX, and TPH are summarized below. As appropriate, a site specific risk assessment may be prepared in lieu of these standard closure levels to evaluate site specific concentrations which are protective of public health and the environment.

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	100

If ground water outside the area of excavation is impacted in excess of the New Mexico Water Quality Control Commission (WQCC) ground water standards, it will be addressed subsequent to the activities contemplated herein.

## SCOPE OF WORK

### SOIL

The high viscosity of the PSH, the nature of the soil matrix, and the depth to ground water at the site realistically preclude installation of a conventional PSH/ground water extraction system. Based on the information obtained from the site to date, excavation of impacted soils at the ground water interface and backfilling appears to be the most realistic closure alternative for the site. Soil conditions at the floor of the existing excavation are sands, very hard calcareous sand (caliche) and limestone. The scope of work includes the following items:

- Perform additional excavation at the current excavation floor to remove impacted soils and entrained PSH directly above and at the ground water interface.
- Stockpile excavated materials on-site.
- Place clean fill above the ground water interface.
- Backfill the excavation to its current elevation.

Currently in-place material below the existing excavation floor will be excavated to a depth of approximately 10 feet. Material below the existing floor consists primarily of granular soils and very hard cemented limestone. Staged materials will be evaluated for suitable management, and may be placed back into the excavation, landfarmed on-site, or landfarmed off-site depending on the soil analytical results and OCD requirements.

### GROUND WATER

PSH is currently hand bailed approximately weekly from temporary wells located in the bottom of the excavation. Ground water samples are collected from the on-site monitoring wells on a quarterly basis. Ground water laboratory results, updated ground water elevation tables, and updated ground water contour and PSH thickness maps are submitted quarterly

after each event. The necessity for ground water remediation will be re-evaluated upon completion of excavation activities.

## **PROJECT SCHEDULE**

This workplan will be implemented within 45 days of receipt of approval from OCD for the activities identified in the plan.



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX

June 23, 1998

Mr. Tony Savoie  
TEXAS - NEW MEXICO PIPE LINE COMPANY  
P. O. Box 1030  
Jal, New Mexico 88252

Re: Ground Water Monitoring Event  
Texas - New Mexico Pipe Line Company  
Site 16 (AKA Saunders Excavation, TNM-10-95)  
Lea County, New Mexico  
KEI Job No. 610062-1

RECEIVED

SEP 11 1998

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Dear Mr. Savoie:

Transmitted with this letter is the ground water binder update packet for the second quarter of 1998 ground water monitoring event conducted at Site 16, located in Lea County, New Mexico. One copy has been submitted to OCD Hobbs and OCD Santa Fe.

The packet contains the following:

- Updated gauging tables
- Updated ground water laboratory results tables
- Updated figures
- A copy of the laboratory ground water results and chain-of-custody documentation
- A dated "tab" for the new event

Please remove and replace the former tables. Add the new dated tab and place the updated figures, laboratory reports, and chain-of-custody documentation behind this tab.

Please call me at (210) 680-3767 if you have any questions or comments.

Respectfully,

*Theresa Nix*

Theresa Nix  
Project Manager

Enclosure

cc: Marc Oler, TTTI  
J. Michael Hawthorne, KEI  
OCD Hobbs, Wayne Price  
OCD Santa Fe, William Olson ✓

*Filed in  
GW Monitoring Report*

TEXAS-NEW MEXICO PIPE LINE COMPANY



EDWIN H. GRIPP  
DISTRICT MANAGER

P.O. BOX 60028  
SAN ANGELO, TX 76906  
915/947-9000  
915/944-2721 FAX

November 6, 1996

William C. Olson  
State of New Mexico  
Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

NOV 18 1996

Dear Mr. Olson:

RE: **ENV-SAUNDERS EXCAVATION/TNM-95-10**  
**HISTORICAL SITE SUMMARY REPORT**  
**KEI JOB NO. 610062**

The enclosed report provides the information requested in your letter of August 19, 1996, regarding current and prior investigations performed at the above referenced site. This information was accumulated from data provided by various individuals and contractors who have worked on the project.

If you have any questions concerning this information, please call me at (915) 947-9001.

Sincerely,

DDB-AER  
Enc.

Wayne Price  
State of New Mexico  
Oil Conservation Division  
1000 West Broadway  
Hobbs, NM 88240



5309 Wurzbach, Suite 100  
San Antonio, Texas 78238  
(210) 680-3767  
(210) 680-3763 FAX

Oil Conservation Division  
P.O. Box 100  
Santa Fe, NM 87505

November 1, 1996

William C. Olson  
**STATE OF NEW MEXICO**  
Energy, Minerals, and Nat. Resources Dept.  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

Re: Texas - New Mexico Pipe Line Company  
Saunders Excavation/TNM-10-95  
Response to NMOCD Letter for Historical Site Summary Report  
KEI Job No. 610062

Dear Mr. Olson:

The New Mexico Oil Conservation Division letter of August 19, 1996, regarding current and prior investigations performed at the above referenced site, required that a report summarizing site activities be provided to you by November 1, 1996.

On October 31, 1996, I spoke with Mr. Roger Anderson of your office, and requested a one week extension to the above-referenced deadline for submittal of the report. Mr. Anderson verbally approved our request, which yields a revised submittal date of Friday, November 8, 1996.

If you have any questions concerning this submittal, please contact me at (210) 680-3767.

Respectfully,

J. Michael Hawthorne, P.G., REM  
Senior Geologist

## RECOVERY ACTIVITIES TNM-10-95

RECEIVED  
MAR 28 1996  
Environmental Bureau  
Oil Conservation Division

This is a summary of activities beginning January 18, 1996 through March 13, 1996

A C-103 plan was faxed to Mr. Bill Olsen on January 18, 1996 to resume clean up efforts by installing 4 additional monitor wells and a product recovery trench at the spill site located in Sec. 18, Township 19 South, Range 37 East, Lea County New Mexico.

On January 19, 1996 crews started installing 2" poly pipe and preparing the area to set a Frak tank. The 2" poly lines were buried at a depth of 18" to prevent freezing and exposure to construction work in the area. The Frak tank was set in a containment area lined with 30 mil. plastic. This work was completed on January 30, 1996.

On January 22, 1996 an application for State land use was submitted to Debby Padilla.

Verbal approval to start installing additional monitor wells and the product trench recovery system were received on January 23, 1996.

Monitor well construction began on January 24, 1996 and completed on January 29, 1996. Bore logs, well construction and sample results are attached. Water elevations were obtained by Environmental Spill Control inc., these elevations have been plotted on a water gradient map, and are also attached. These gradient maps started reflecting a slope in the water table toward the recovery pit (note water elevations dated 2/23/96).

Basin Survey co. surveyed the elevations and locations of all the monitor wells at the site on February 15, 1996. They also tied in the locations of 2 windmills located south (down gradient) 1 water well (Warren H2O well) west of the site and the city of Monument's water well located north west of the site.

The product recovery trenches were installed in the bottom of the excavated area on January 30, 1996. Product recovery operations began January 31, 1996 and are on-going. The recovery trenches are covered with tin and the recovery pit is covered with a tarp to minimize the exposure of crude oil to wildlife in the area and to keep sand from getting into the recovery area. The atmospheric conditions are monitored for Oxygen deficient(O<sub>2</sub>), Lower Explosive Level (L.E.L.) Hydrogen Sulfide (H<sub>2</sub>S) and Carbon Monoxide (Co) prior to entry into the pit area and during recovery operations. Additional atmospheric tests for Total Other Hydrocarbons (T.O.H.) and Benzene have been done in the pit area and the product recovery tank. A data sheet is attached showing the levels encountered. Product is being pumped from the recovery pit with a 2" floating dock skimmer an 1 1/2" Viking pump and a 2" Honda Trash Pump through a 2" poly line to a 500 bl. Frak tank. Pit levels are recorded prior to and after each skimming operation. The Frak tank is gauged on Mondays of each week for total liquid recovered, an O.R.S.

interface gauge is used to calculate the crude oil recovered. A data sheet is attached showing the Pit levels and product recovery.

Water samples of the water in the recovery pit were collected on February 9, 1996. All samples were collected at 1 ft below the surface. 2--40 ml. V.O.A. bottles were filled for a TCLP volatile analysis, 1-- 250 ml. bottle was filled for a TCLP metals analysis and 1-- 1 litre bottle was filled for the R.C.I. analysis. These samples were iced down and transported to Environmental Labs Of Texas the same day. The results are attached. Another set of water samples were collected March 13, 1996, the results of these tests will be forwarded in about 10 days.

There has been no transportation or disposal of any soil or water from the site. However we will need to haul and dispose of the water being stored in the Frak tank in the near future. So far the water samples have indicated that the water in the recovery pit is Non-Hazardous. We will continue to monitor this process and report as needed prior to disposal.

If agreed on, I will prepare a similar report of the site activities on a monthly basis. The next report due April 18, 1996.

*John A. Zarrin*

TEXAS-NEW MEXICO PIPELINE CO.

**PRODUCT RECOVERY  
TNM-10-95**

DATE	ARRIVE	PIT LEVEL	ELEVATION	TIME	PIT LEVEL	ELEVATION	TIME	TOTAL	OIL/BLS	OIL/BLS	REMARKS
	LOCATION	BEFORE SKIMMING			AFTER SKIMMING			LIQUID	RECOVERY	RECOVERY	
								RECOVERY	WEEK	TOTAL	
1/31/96	8:00 A.M.	N/A									LINES FROZEN
1/31/96	2:40 P.M.	N/A		2:50 P.M.	PUMP DRY		4:35 P.M.				
2/2/96	9:30 A.M.	N/A		11:30 A.M.	PUMP DRY		1:30 P.M.				INST. PIT BENCH MARK
2/4/96	10:50 A.M.	3.55	3646.34								
2/5/96	2:05 P.M.	N/C			N/C			57 BLS	1.85	1.85	
2/6/96	8:05 A.M.	3.73	3646.16								
2/8/96	1:35 P.M.	3.13	3646.76	1:45 P.M.	5.38	3644.51	2:30 P.M.				
2/9/96	6:45 A.M.										COLLECT SAMPLES
2/10/96	9:35 A.M.	3.63	3646.26	9:45 A.M.	4.57	3645.32	10:30 A.M.				
2/11/96	4:30 P.M.	3.22	3646.67	4:40 P.M.	3.66	3646.23	5:30 P.M.				
2/12/96	2:20 P.M.	3.58	3646.31	2:30 P.M.	3.95	3645.94	3:20 P.M.	125 BLS	0.93	2.78	
2/14/96	9:15 A.M.	3.27	3646.62	9:40 A.M.	3.77	3646.12	10:45 A.M.				
2/16/96	9:00 A.M.	3.17	3646.72	9:13 A.M.	3.63	3646.26	10:15 A.M.				
2/19/96	7:53 A.M.	2.95	3646.94	8:15 A.M.	3.20	3646.69	9:05 A.M.	159 BLS	0.29	3.07	
2/21/96	7:30 A.M.	2.95	3646.94	7:40 A.M.	3.28	3646.61	8:48 A.M.				
2/24/96	8:30 A.M.	2.88	3647.01	8:45 A.M.	3.13	3646.76	9:45 A.M.				
2/25/96	8:45 A.M.	3.00	3646.89	9:00 A.M.	3.32	3646.57	10:05 A.M.				
2/26/96	10:40 A.M.	3.05	3646.84	2:17 P.M.	3.15	3646.74	2:50 P.M.	180.8 BLS	1.47	4.54	
3/1/96	9:40 A.M.	2.84	3647.05	9:45 A.M.	3.30	3646.59	10:47 A.M.				
3/4/96	8:35 A.M.	2.90	3646.99	8:53 A.M.	3.48	3646.41	10:05 A.M.	194 BLS	2.01	6.55	
3/6/96	8:40 A.M.	3.05	3646.84	8:47 A.M.	3.45	3646.44	9:36 A.M.				
3/8/96	10:55 A.M.	3.05	3646.84	11:04 A.M.	3.62	3646.27	12:12 P.M.				
3/10/96	8:20 A.M.	3.15	3646.74	8:28 A.M.	3.72	3646.17	9:41 A.M.				
3/11/96	10:35 A.M.	3.43	3646.46	10:35 A.M.	3.84	3646.05	11:18 P.M.	239.4 BLS	0.5	7.05	
<b>AVERAGE</b>		<b>3.19</b>	<b>3646.70</b>		<b>3.67</b>	<b>3646.22</b>	<b>TOTALS</b>	<b>239.4 BLS</b>		<b>7.05</b>	

**ATMOSPHERIC TESTS  
TNM-10-95**

LOCATION	DATE	TIME	O2 %	L.E.L. %	CO P.P.M.	H2S PPM	T.O.H. PPM	BENZENE PPM
PIT	1/31/96	2:48 P.M.	20.7	0	0	0	<10	<.5
PIT	1/31/96	2:55 P.M.	20.8	0	0	0		
PIT	2/2/96	11:15 A.M.	20.9	0	0	0	<10	<.5
PIT	2/2/96	11:37 A.M.	20.8	0	0	0		
PIT	2/4/96	10:55 A.M.	20.9	0	0	0	<10	<.5
TANK	2/5/96	2:10 P.M.	20.8	0	0	0	<10	<.5
PIT	2/6/96	8:15 A.M.	20.7	0	0	0	<10	<.5
PIT	2/8/96	1:40 P.M.	20.9	0	0	0	<10	<.5
PIT	2/8/96	1:52 P.M.	20.8	0	0	0		
PIT	2/10/96	9:40 A.M.	20.9	0	0	0	<10	<.5
PIT	2/10/96	9:51 A.M.	20.7	0	0	0		
PIT	2/11/96	4:35 P.M.	20.8	0	0	0	<10	<.5
PIT	2/11/96	4:46 P.M.	20.9	0	0	0		
TANK	2/12/96	2:24 P.M.	20.8	0	0	0	<10	<.5
PIT	2/12/96	2:30 P.M.	20.8	0	0	0	<10	<.5
PIT	2/12/96	2:38 P.M.	20.7	0	0	0		
PIT	2/14/96	9:28 A.M.	20.9	0	0	0		
PIT	2/14/96	9:44 A.M.	20.8	0	0	0		
TANK	2/14/96	11:00 A.M.	20.9	0	0	0	10	<.5
PIT	2/16/96	9:08 A.M.	21.3	0	0	0		
PIT	2/16/96	9:22 A.M.	21.4	0	0	0		
PIT	2/19/96	8:00 A.M.	20.9	0	0	0		
PIT	2/19/96	8:21 A.M.	21	0	0	0		
PIT	2/21/96	7:35 A.M.	20.8	0	0	0		
PIT	2/21/96	7:44 A.M.	20.8	0	0	0		
PIT	2/24/96	8:36 A.M.	20.6	0	0	0		
PIT	2/24/96	8:49 A.M.	20.8	0	0	0		
PIT	2/25/96	8:51 A.M.	21	0	0	0		
PIT	2/25/96	9:06 A.M.	20.9	0	0	0		
TANK	2/26/96	10:40 A.M.	20.8	0	0	0	<10	<.5
PIT	2/26/96	2:11 P.M.	20.9	0	0	0		
PIT	2/26/96	2:23 P.M.	20.7	0	0	0		
PIT	3/1/96	9:42 A.M.	20.9	0	0	0		
PIT	3/1/96	9:51 A.M.	20.8	0	0	0		
PIT	3/4/96	8:41 A.M.	20.7	0	0	0		
PIT	3/4/96	9:00 A.M.	20.8	0	0	0		
PIT	3/6/96	8:42 A.M.	20.9	0	0	0		
PIT	3/6/96	8:53 A.M.	20.8	0	0	0		
PIT	3/8/96	11:00 A.M.	20.9	0	0	0		
PIT	3/8/96	11:09 A.M.	20.9	0	0	0		
PIT	3/10/96	8:25 A.M.	20.7	0	0	0		
PIT	3/10/96	8:36 A.M.	20.8	0	0	0		
PIT	3/11/96	10:35 A.M.	20.9	0	0	0		
PIT	3/11/96	10:40 A.M.	20.8	0	0	0		

O2,LEL,CO AND H2S TEST MSA 4 GAS MONITOR  
TOH AND BENZENE TEST  
SENSIDYNE L.O.S TUBE

3/17/96

TEXAS NEW MEXICO  
PIPE LINE COMPANY

205 E. BENDER  
P.O. BOX 2528  
HOBBS, NM 88241

HOBBS DISTRICT  
(505) 393-2135

RECEIVED

MAR 28 1996

Environmental Bureau  
Oil Conservation Division

J.C. 1, windmill "1", + windmill "2"  
Are Located in Section 19, South  
OF the Site indicated on the Drawing

The City of Monuments Water Well  
is Located 305 Ft From the North line  
+ 111 Ft From the West line  
in the N.W 1/4 OF Section 18

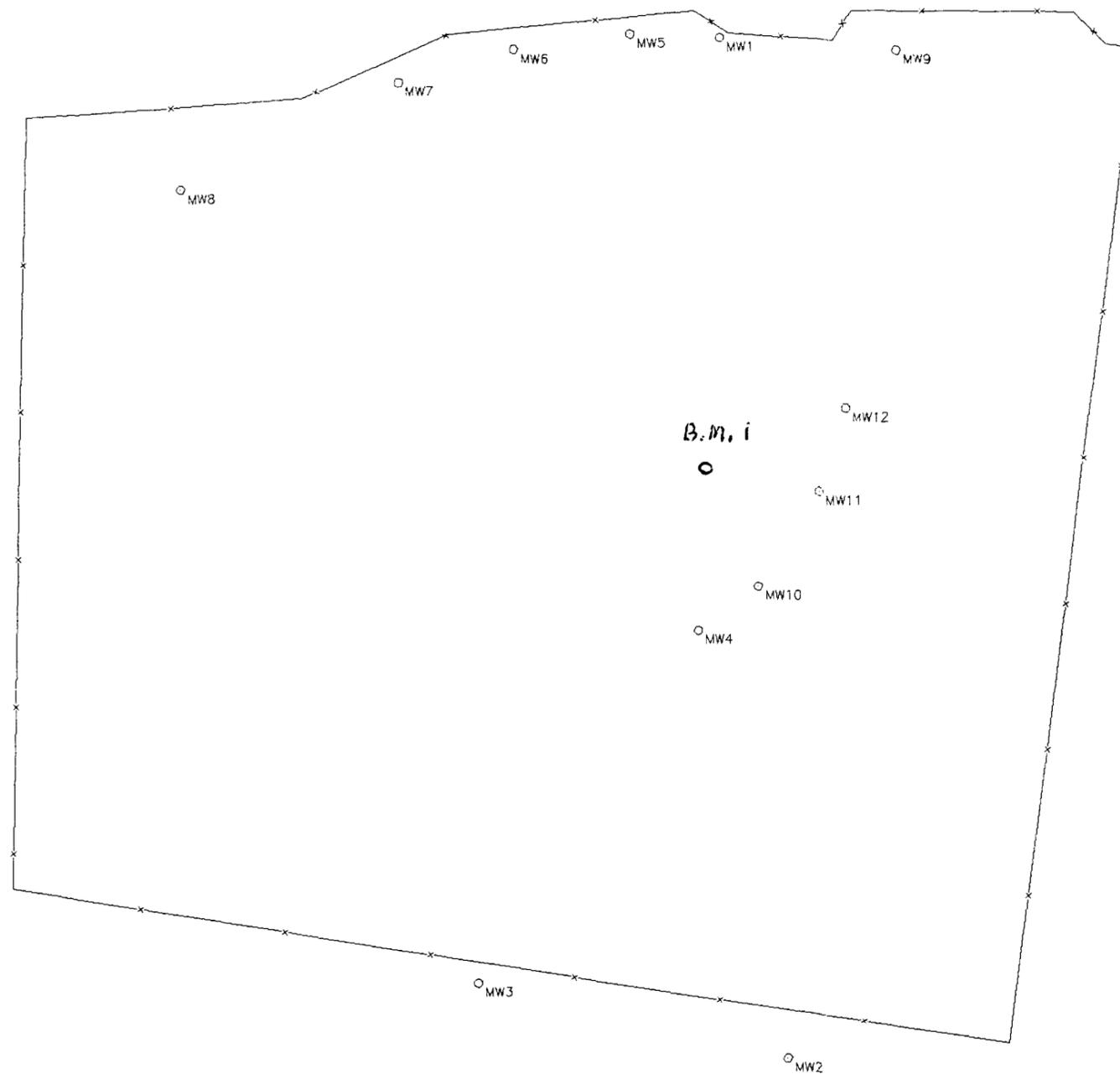
B.M. 1 (Benchmark 1) is Located  
over the Recovery Pit in the Bottom  
OF the excavation.

J. L. Sauer

UNDERGROUND PIPELINES HAVE ABOVE-GROUND MARKERS  
PLEASE CALL BEFORE DIGGING OR DEEP PLOWING  
DON'T TAKE CHANCES

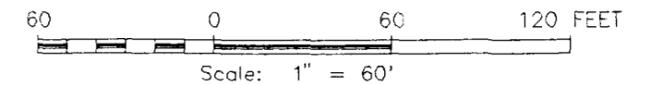
\*CALL COLLECT - 24-HOURS A DAY

*JAL	1-800-232-5771	LOVINGTON	(505) 396-3341
JAL	(505) 395-2026	LOVINGTON	(505) 396-3842
EUNICE	(505) 394-2770	FARMINGTON	(505) 325-7372
PLACITAS	(505) 867-4311	ANETH, UT	(801) 651-3475



BASIS OF OF COORDINATES - SOUTHWEST CORNER OF SECTION 18

MW 1	X - 12656.98 Y - 11189.44 Z - 3690.44	MW 9	X - 12729.96 Y - 11183.59 Z - 3690.30
MW 2	X - 12685.91 Y - 10774.13 Z - 3688.23	MW 10	X - 12672.57 Y - 10966.03 Z - 3688.33
MW 3	X - 12559.30 Y - 10804.31 Z - 3688.03	MW 11	X - 12698.05 Y - 11004.32 Z - 3689.11
MW 4	X - 12647.82 Y - 10948.23 Z - 3688.07	MW 12	X - 12709.03 Y - 11038.08 Z - 3689.16
MW 5	X - 12620.41 Y - 11191.10 Z - 3691.28	JC 1	X - 12628.55 Y - 9659.53 Z - 3680.11
MW 6	X - 12572.63 Y - 11184.48 Z - 3691.81	WINDMILL 1	X - 11843.26 Y - 6917.44
MW 7	X - 12525.30 Y - 11171.22 Z - 3691.48	WINDMILL 2	X - 15083.90 Y - 7201.36
MW 8	X - 12436.15 Y - 11127.46 Z - 3692.03	WARREN H2O WELL	X - 10585.46 Y - 11056.00
		B.M. i	Z - 3649.89



**TEXAS - NEW MEXICO PIPE LINE CO.**

TIE IN OF MONITOR WELLS LOCATED IN  
SECTIONS 18&19, TOWNSHIP 19 SOUTH, RANGE 37 EAST,  
N.M.P.M., LEA COUNTY, NEW MEXICO.

Survey Date: 2-8-96	Drawn By: S.C. NICHOLS
W.O. No. 6046	File Name: TNM6046A.DWG
Date: 2-15-96	Disk: SCN #25
	Rev. Date: 3-13-96

13	18
24	19



**TEXAS - NEW MEXICO  
PIPE LINE COMPANY**

205 E. BENDER  
P.O. BOX 2528  
HOBBS, NM 88241

HOBBS DISTRICT  
(505) 393-2135

Water Samples Collected 2/9/96

To Determine if water in the pit  
is RCRA waste.

Samples collected 1' below the surface

Filled 2- 40 ml UOA- TCLP Volatiles

1- 250ml TCLP Metals

1- 1l RCI + TPH

*J. L. Davis*

UNDERGROUND PIPELINES HAVE ABOVE-GROUND MARKERS  
PLEASE CALL BEFORE DIGGING OR DEEP PLOWING  
DON'T TAKE CHANCES

**\*CALL COLLECT - 24-HOURS A DAY**

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JAL	(505) 395-2026	LOVINGTON	(505) 396-3842
EUNICE	(505) 394-2770	FARMINGTON	(505) 325-7372
PLACITAS	(505) 867-4311	ANETH, UT	(801) 651-3475

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

**RECEIVED**

MAR 28 1996

Environmental Bureau  
Oil Conservation Division

TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

Receiving Date: 02/09/96  
Sample Type: WATER  
Project : TNM-10-95  
Project Location: 2 MILES NORTH OF MONUMENT

Reporting Date: 02/23/96  
Sampling Date: 02/09/96  
Sample Condition: Intact/Iced  
Analysis Date: 02/15/96

TCLP METALS (ppm)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
6732	TNM-10-95 PIT	0.26	0.002	1.1	0.01	<0.05	<0.002	<0.10	<0.002
	Minimum Detection Level	0.01	0.002	0.1	0.01	0.05	0.002	0.1	0.002
	% IA	100	100	97	97	89	94	101	107
	% EA	80	125	90	82	62	80	70	68

METHODS: EPA SW 846-1311, 7061, 7080, 7760, 7130, 7190, 7420, 7471, 7741

  
Michael R. Fowler

2-23-96  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

RECEIVING DATE: 02/09/96  
SAMPLE TYPE: WATER  
PROJECT : TNM-10-95  
FIELD CODE: TNM-10-95 PIT

ANALYSIS DATE: 02/14/96  
SAMPLING DATE: 02/09/96  
SAMPLE CONDITION: Intact/lced

TCLP VOLATILES (ppm)	SAMPLE 6732	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.005	ND	116	100
2-Butanone	0.131	0.100	ND		104
Chloroform	ND	0.005	ND		106
Benzene	ND	0.005	ND		106
1,2-Dichloroethane	ND	0.005	ND		106
Vinyl Chloride	ND	0.005	ND	100	105
Carbon Tetrachloride	ND	0.005	ND		101
Trichloroethene	ND	0.005	ND		98
Tetrachloroethene	ND	0.005	ND		115
Chlorobenzene	ND	0.005	ND	94	103
1,4-Dichlorobenzene	ND	0.005	ND		95

SYSTEM MONITORING COMPOUNDS	% RECOVERY
dibromofluoromethane	89
toluene-d8	120
4-bromofluorobenzene	90

ND = < PQL  
PQL = PRACTICAL QUANTITATION LIMIT  
Methods: EPA SW 846-8240, 1311

  
Michael R. Fowler

2-23-96  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

Receiving Date: 02/09/96  
Sample Type: WATER  
Project: TNM-10-95  
Project Location: 2 MILES NORTH OF MONUMENT

Analysis Date: 02/21/96  
Sampling Date: 02/09/96  
Sample Condition: Intact/Iced

ELT#	Field Code	REACTIVITY		CORROSIVITY	IGNITABILITY
		H2S	CN-	(s.u.)	
		NON-REACTIVE	NON-CORROSIVE		
		(ppm)	(ppm)		
6732	TNM 10-95 PIT	<10	<2.5	7.05	>140 deg. F
	RPD	0	0	0	0
	% PRECISION	100	100		
	% INSTRUMENT ACCURACY			100	

METHODS: EPA SW-846-2.1.3,2.1.2,2.1.1

  
Michael R. Fowler

2-23-96  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

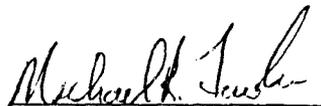
TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

RECEIVING DATE: 02/09/96  
SAMPLE TYPE: WATER  
PROJECT #: TNM-10-95  
PROJECT LOCATION: 2 MILES NORTH OF MONUMENT

ANALYSIS DATE: 02/13/96  
SAMPLING DATE: 02/09/96  
SAMPLE CONDITION: INTACT/COOL

ELT#	FIELD CODE	TPH (mg/l)
6732	TNM-10-95 PIT	43
	QUALITY CONTROL	58
	TRUE VALUE	60
	% PRECISION	97

Methods: EPA 418.1

  
Michael R. Fowler

2-23-96  
Date



TEXAS NEW MEXICO  
PIPE LINE COMPANY

205 E. BENDER  
P.O. BOX 2528  
HOBBS, NM 88241

HOBBS DISTRICT  
(505) 393-2135

RECEIVED

MAR 28 1996

Environmental Bureau  
Oil Conservation Division

Water Samples Collected 9/18/95

Storm water in Pit  
Prior to Discharge to Surface  
Filled

2- 40 ml- VOA- BTEX

1- 1 l

Collected By J. L. Garcia  
+ WAYNE Price (NMOCB)

UNDERGROUND PIPELINES HAVE ABOVE-GROUND MARKERS  
PLEASE CALL BEFORE DIGGING OR DEEP PLOWING  
DON'T TAKE CHANCES

\*CALL COLLECT - 24-HOURS A DAY

*JAL	1-800-232-5771	LOVINGTON	(505) 396-3341
JAL	(505) 395-2026	LOVINGTON	(505) 396-3842
EUNICE	(505) 394-2770	FARMINGTON	(505) 325-7372
PLACITAS	(505) 867-4311	ANETH, UT	(801) 651-3475

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-394-2591

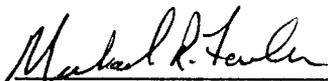
Receiving Date: 09/18/95  
Sample Type: WATER  
Project : TNM -10-95  
Project Location: 2 miles N. Monument, NM

Analysis Date: 09/18/95  
Sampling Date: 09/18/95  
Sample Condition: Intact/Cool

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYLBENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
5025	S.W. #1	<0.001	<0.001	<0.001	<0.001	<0.001

% IA	110	95	92	91	94
% EA	91	91	89	89	90

METHODS: SW 846-8020,5030

  
Michael R. Fowler

9-19-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-394-2591

Receiving Date: 09/18/95  
Sample Type: WATER  
Project : TNM-10-95  
Project Location: 2 MI. N. MONUMENT, NM

Analysis Date: 09/19/95  
Sampling Date: 09/18/95  
Sample Condition: Intact/Iced

### METALS (mg/l)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
5026	S.W. #2	0.03	<0.50	<0.50	<0.02	<0.02	<0.005	<0.05	<0.50

<b>Detection Limit</b>	0.02	0.50	0.50	0.02	0.02	0.005	0.05	0.50
% INSTRUMENT ACCURACY	95	111	99	98	101	114	104	90
% EXTRACTION ACCURACY	101	91	96	102	100	125	102	104

METHODS: EPA SW 846-.7000 SERIES, 7471

  
Michael R. Fowler

9-22-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-394-2591

Receiving Date: 09/18/95  
Sample Type: WATER  
Project : TNM 10-95

Analysis Date: 09/19/95  
Sampling Date: 09/18/95  
Sample Condition: Intact/Cool

ELT#	FIELD CODE	Cl (mg/l)	SO4 (mg/l)	HCO2 (mg/l)	CO3 (mg/l)	K (mg/l)	Ca (mg/l)	Mg (mg/l)	Na (mg/l)
5026	S.W. #2	21	<1	73.0	<5	5.69	13.63	2.31	1.68

QUALITY CONTROL	2127	30	---	---	3.19	0.95	1.02	4.26
TRUE VALUE	2232	25	---	---	3.00	1.00	1.00	5.00
% PRECISION	95	120	---	---	106	95	102	85

METHODS: SM 4500, EPA 375.4, 310.2, 242.1, 215.1, 258.1, 273.1

  
Michael R. Fowler

9-22-95  
Date



TEXAS NEW MEXICO  
PIPE LINE COMPANY

205 E. BENDER  
P.O. BOX 2528  
HOBBS, NM 88241

HOBBS DISTRICT  
(505) 393-2135

RECEIVED

MAR 28 1996

Environmental Bureau  
Oil Conservation Division

Samples Collected 6/27/95  
water & Soil

During & After Installation &  
Completion of the First 3 Monitor  
wells @ TUM-10-95

Field Code Info

mw - ①04 = m.w. 1

②04 = m.w. 2

③04 = m.w. 3

mw - ①03 = m.w. 1

②03 = m.w. 2

③03 = m.w. 3

UNDERGROUND PIPELINES HAVE ABOVE-GROUND MARKERS  
PLEASE CALL BEFORE DIGGING OR DEEP PLOWING  
DON'T TAKE CHANCES

\*CALL COLLECT - 24 -HOURS A DAY

*JAL	1-800-232-5771	LOVINGTON	(505) 396-3341
JAL	(505) 395-2026	LOVINGTON	(505) 396-3842
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PLACITAS	(505) 867-4311	ANETH, UT	(801) 651-3475

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"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

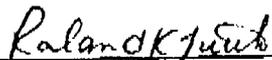
Receiving Date: 06/28/95  
Sample Type: WATER  
Project: TNM 1095  
Project Location: NONE GIVEN

Analysis Date: 06/29/95  
Sampling Date: 06/27/95  
Sample Condition: Intact

ELT#	FIELD CODE	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	m,p-XYLENE (mg/L)	o-XYLENE (mg/L)
4389	TNM 1095 MW 104	<0.5	<0.5	<0.5	<0.5	<0.5
4390	TNM 1095 MW 204	<0.5	<0.5	<0.5	<0.5	<0.5
4391	TNM 1095 MW 304	<0.5	<0.5	<0.5	<0.5	<0.5

%EA	100	97	95	96	99
%IA	104	96	94	98	99
BLANK	ND	ND	ND	ND	ND

METHODS: SW 846-8020.5030

  
Raland K. Tuttle

7-10-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

Receiving Date: 06/28/95  
Sample Type: WATER  
Project: TNM 1095  
Project Location: NONE GIVEN

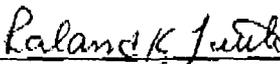
Analysis Date: 07/03/95  
Sampling Date: 06/27/95  
Sample Condition: Intact/Cool

## TOTAL METALS (mg/l)

ELT#	Field Code	As	Se	Cr	Cd	Pb	Ag	Ba	Hg
4389	TNM 1095 MW 103	<1	<1	<0.1	<0.1	0.07	<0.1	23.3	<0.02
4390	TNM 1095 MW 203	<1	<1	0.13	<0.1	0.06	<0.1	17.5	<0.02
4391	TNM 1095 MW 303	<1	<1	<0.1	<0.1	0.14	<0.1	20.0	<0.02

Detection Limit	1.0	1.0	0.1	0.1	0.1	0.1	0.1	0.1	0.02
% EXTRACTION ACCURACY	121	110	105	89	85	115	70	80	
% INSTRUMENT ACCURACY	111	93	95	96	102	98	105	105	

METHODS: EPA SW 846-7000.7471

  
Raland K. Tuttle

7-6-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

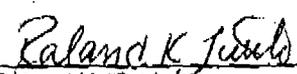
TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

Receiving Date: 06/28/95  
Sample Type: WATER  
Project: TNM 1095  
Project Location: NONE GIVEN

Analysis Date: 07/03/95  
Sampling Date: 06/27/95  
Sample Condition: Intact

ELT#	Field Code	Cl (mg/L)	SO4 (mg/L)	CO3 (mg/L)	HCO2 (mg/L)	Ca (mg/L)	Mg (mg/L)	Na (mg/L)	K (mg/L)
4389	TNM 1095 MW 102	181	125	<5	5.5	208	126	116	4.0
4390	TNM 1095 MW 202	85	38	<5	2.3	96	58	52	4.3
4391	TNM 1095 MW 302	64	150	<5	3.0	84	51	39	4.4

METHODS: EPA 325, 375, 310, 215.2, 258.1

  
Roland K. Tuttle

7-10-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

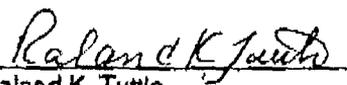
Receiving Date: 06/28/95  
Sample Type: WATER  
Project #: TNM 1095  
Project Location: NONE GIVEN  
Field Code: TNM 1095 MW 101

Analysis Date: 07/03/95  
Sampling Date: 06/27/95  
Sample Condition: Intact/ Cool

PAH (mg/L)	DETECTION LIMIT	ELT#		%EA	%IA
		4389	BLANK		
Naphthalene	0.002	ND	ND		111
Acenaphthylene	0.002	ND	ND		99
Acenaphthene	0.002	ND	ND	75	97
Fluorene	0.002	ND	ND		116
Phenanthrene	0.002	ND	ND		97
Anthracene	0.002	ND	ND		98
Fluoranthene	0.002	ND	ND		94
Pyrene	0.002	ND	ND	129	127
Benzo[a]anthracene	0.002	ND	ND		98
Chrysene	0.002	ND	ND		109
Benzo[b]fluoranthene	0.002	ND	ND		105
Benzo[k]fluoranthene	0.002	ND	ND		103
Benzo [a]pyrene	0.002	ND	ND		104
Indeno[1,2,3-cd]pyrene	0.002	ND	ND		86
Dibenz[a,h]anthracene	0.002	ND	ND		90
Benzo[g,h,i]perylene	0.002	ND	ND		87

SYSTEM MONITORING COMPOUNDS	% Recovery
2-Fluorophenol	49
Phenol-d5	55
Nitrobenzene-d5	62
2-Fluorobiphenyl	64
2,4,6-Tribromophenol	64
Terphenyl-d14	112

Method: SW 846-8270  
ND= NOT DETECTED

  
Raland K. Tuttle

7-10-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

Receiving Date: 06/28/95  
Sample Type: WATER  
Project #: TNM 1095  
Project Location: NONE GIVEN  
Field Code: TNM 1095 MW 201

Analysis Date: 07/03/95  
Sampling Date: 06/27/95  
Sample Condition: Intact/ Cool

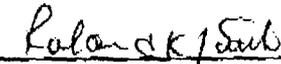
PAH (mg/L)	DETECTION LIMIT	ELT# 4390	BLANK	%EA	%IA
Naphthalene	0.002	ND	ND		111
Acenaphthylene	0.002	ND	ND		99
Acenaphthene	0.002	ND	ND	75	97
Fluorene	0.002	ND	ND		116
Phenanthrene	0.002	ND	ND		97
Anthracene	0.002	ND	ND		98
Fluoranthene	0.002	ND	ND		94
Pyrene	0.002	ND	ND	129	127
Benzo[a]anthracene	0.002	ND	ND		98
Chrysene	0.002	ND	ND		109
Benzo[b]fluoranthene	0.002	ND	ND		105
Benzo[k]fluoranthene	0.002	ND	ND		103
Benzo [a]pyrene	0.002	ND	ND		104
Indeno[1,2,3-cd]pyrene	0.002	ND	ND		86
Dibenz[a,h]anthracene	0.002	ND	ND		90
Benzo[g,h,i]perylene	0.002	ND	ND		87

SYSTEM MONITORING COMPOUNDS

% Recovery

2-Fluorophenol	40
Phenol-d5	40
Nitrobenzene-d5	50
2-Fluorobiphenyl	57
2,4,6-Tribromophenol	50
Terphenyl-d14	123

Method: SW 846-8270  
ND= NOT DETECTED

  
Raland K. Tuttle

7-10-95  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

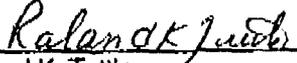
Receiving Date: 06/28/95  
Sample Type: WATER  
Project #: TNM 1095  
Project Location: NONE GIVEN  
Field Code: TNM 1095 MW 301

Analysis Date: 07/03/95  
Sampling Date: 06/27/95  
Sample Condition: Intact/ Cool

PAH (mg/L)	DETECTION LIMIT	ELT# 4391	BLANK	%EA	%IA
Naphthalene	0.002	ND	ND		111
Acenaphthylene	0.002	ND	ND		99
Acenaphthene	0.002	ND	ND	75	97
Fluorene	0.002	ND	ND		116
Phenanthrene	0.002	ND	ND		97
Anthracene	0.002	ND	ND		98
Fluoranthene	0.002	ND	ND		94
Pyrene	0.002	ND	ND	129	127
Benzo[a]anthracene	0.002	ND	ND		98
Chrysene	0.002	ND	ND		109
Benzo[b]fluoranthene	0.002	ND	ND		105
Benzo[k]fluoranthene	0.002	ND	ND		103
Benzo [a]pyrene	0.002	ND	ND		104
Indeno[1,2,3-cd]pyrene	0.002	ND	ND		86
Dibenz[a,h]anthracene	0.002	ND	ND		90
Benzo[g,h,i]perylene	0.002	ND	ND		87

SYSTEM MONITORING COMPOUNDS	% Recovery
2-Fluorophenol	50
Phenol-d5	56
Nitrobenzene-d5	63
2-Fluorobiphenyl	69
2,4,6-Tribromophenol	57
Terphenyl-d14	126

Method: SW 846-8270  
ND= NOT DETECTED

  
Raland K. Tuttle

7-10-95  
Date

**IRONMENTAL**

**LAB OF  , INC.**

"Don't Treat Your Soil Like Dirt!"

TEXAS-NEW MEXICO PIPE LINE  
ATTN: MR. TONY SAVOIE  
P.O. BOX 60028  
SAN ANGELO, TEXAS 76906  
FAX: 505-395-2636

Receiving Date: 06/27/95  
Sample Type: SOIL  
Project #: 10 (6-23-95)  
Project Location: NEW MEXICO

Analysis Date: 06/27/95  
Sampling Date: 06/21/95  
Sample Condition: Intact / cool  
Project Manager: JIM HOLLY

ELT# FIELD CODE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYLBENZENE (mg/kg)	m,p-XYLENE (mg/kg)	o-XYLENE (mg/kg)	TPH (mg/kg)
4375 MW 1 19-19.5	<0.5	<0.5	<0.5	<0.5	<0.5	190
4376 MW 1 39-40	<0.5	<0.5	<0.5	<0.5	<0.5	230
4377 MW 2 25-27	<0.5	<0.5	<0.5	<0.5	<0.5	140
4378 MW 2 40-42	<0.5	<0.5	<0.5	<0.5	<0.5	190
4379 MW 3 30-32	<0.5	<0.5	<0.5	<0.5	<0.5	200
4380 MW 3 40-42	<0.5	<0.5	<0.5	<0.5	<0.5	160

RPD	0	0	5	4	4	0
%IA	102	96	92	96	95	90
BLANK	ND	ND	ND	ND	ND	ND

ND= NOT DETECTED

METHODS: SW 846-8020, 5030, EPA 418.1

Raland K Tuttle  
Raland K. Tuttle

6-28-95  
Date

# Environmental Lab

# Huntingdon

A member of the **ETH** group of companies

HOUSTON EAS 222 CAVALCADE ST., HOUSTON, TEXAS 77009 (713) 692-9151  
 DALLAS EAS 2575 LONE STAR DR., DALLAS, TEXAS 75212 (214) 631-2700  
 MIDLAND EAS 1703 WEST INDUSTRIAL, MIDLAND, TEXAS 79701 (915) 683-3349

## Analysis Request and Chain of Custody Record

Lab ID No.	Field Sample No./ Identification	Date and Time	g/g	mg/g	Sample Container (Size/Mat'l)	Sample Type (Liquid Sludge, Etc.)	Preservative	ANALYSIS REQUESTED	LABORATORY REMARKS
Project no. <b>TNM-1095</b> Client/Project									
43911	TNM-1095 MW 304	6-27-95 2:10PM	✓		40 mL	water	HCL	BTEX	
43911	TNM-1095 MW 305	6-27-95 2:10PM	✓		40 mL	water	HCL	BTEX	
43910	TNM-1095 MW 304	6-27-95 1:55 PM	✓		40 mL	water	HCL	BTEX	
4390	TNM-1095 MW 305	6-27-95 1:55 PM	✓		40 mL	water	HCL	BTEX	
4389	TNM-1095 MW 104	6-27-95 11:45 AM	✓		40 mL	water	HCL	BTEX	
4389	TNM-1095 MW 105	6-27-95 11:45 AM	✓		40 mL	water	HCL	BTEX	
Samplers: (Print) <b>Ernest J. Richardte</b> Relinquished by: <i>[Signature]</i> Date: <b>6-27-95</b> Time: <b>16:45</b> Relinquished by: <i>[Signature]</i> Date: <b>6-28-95</b> Time: <b>9:10 A</b> Relinquished by: <i>[Signature]</i> Date: <b>6-28-95</b> Time: <b>9:10 A</b>									
Results by: _____ Rush Charges Authorized Yes _____ No _____ REMARKS: _____ Received by Laboratory: <i>[Signature]</i> Date: <b>6-27-95</b> Time: <b>10:46</b> Received by: <i>[Signature]</i> Date: <b>6-28-95</b> Time: <b>9:04 AM</b> Data Results To: <b>Blackjacks</b> Intact: Yes _____ No _____ Laboratory No. _____									

Analysis Request and Chain of Custody Record

# Huntingdon

A member of the **HTH** group of companies

- HOUSTON EAS 222 CAVALCADE ST., HOUSTON, TEXAS 77009 (713) 692-9151
- DALLAS EAS 2575 LONE STAR DR., DALLAS, TEXAS 75212 (214) 631-2700
- MIDLAND EAS 1703 WEST INDUSTRIAL, MIDLAND, TEXAS 79701 (915) 683-3349

Project no. \_\_\_\_\_ Client/Project \_\_\_\_\_

Lab ID No.	Field Sample No., Identification	Date and Time	g/g	mg/g	Sample Container (Size/Mat'l)	Sample Type (Liquid Sludge, Etc.)	Preservative	ANALYSIS REQUESTED	LABORATORY REMARKS	
4389	TMM-1095 MW103	6-27-95 2:10 PM	✓		L/glass	water		Sem. - Volatiles		
4351	TMM-1095 MW302	6-27-95 2:10 PM	✓		L/plastic	water		Major - Minerals		
4391	TMM-1095 MW303	6-27-95 2:10 PM	✓		L/plastic	water		Metals		
4390	TMM-1095 MW301	6-27-95 1:55 PM	✓		L/skew	water		Semi - Volatiles		
4390	TMM-1095 MW302	6-27-95 1:55 PM	✓		L/plastic	water		Major - Minerals		
4390	TMM-1095 MW303	6-27-95 1:55 PM	✓		L/plastic	water		Metals		
4389	TMM-1095 MW101	6-27-95 1:45 AM	✓		L/glass	water		Semi - Volatiles		
4389	TMM-1095 MW102	6-27-95 1:45 AM	✓		L/plastic	water		Major - Minerals		
4389	TMM-1095 MW103	6-27-95 1:45 AM	✓		L/plastic	water		Metals		
Samplers: (Print) Ernest J. Richte		Relinquished by: (Signature)						Received by: (Signature)	Date: 6-27-95 Time: 16:45	COC Seal No.
Affiliation Relinquished by:		(Signature)						Received by: (Signature)	Date: 6-28-95 Time: 9:10 AM	REC'D. ON ICE
Relinquished by: (Signature)		(Signature)						Received by Laboratory: (Signature)	Date: 6-28-95 Time: 9:10 AM	Intact: Yes _____ No _____
Results by _____ Rush Charges Authorized Yes _____ No _____		REMARKS:		1.		2.		Laboratory No.		



NMOCD INTER-OFFICE CORRESPONDENCE

TO: Bill Olson-NMOCD Hydrogeologist  
From: Wayne Price-Environmental Engineer  
Date: Jan. 29, 1996  
Reference: TNMPL leak site and Texaco C.J. Sanders Pit  
Subject: Location of pit in reference to City of Monument  
water supply .well



Comments:

Dear Bill,

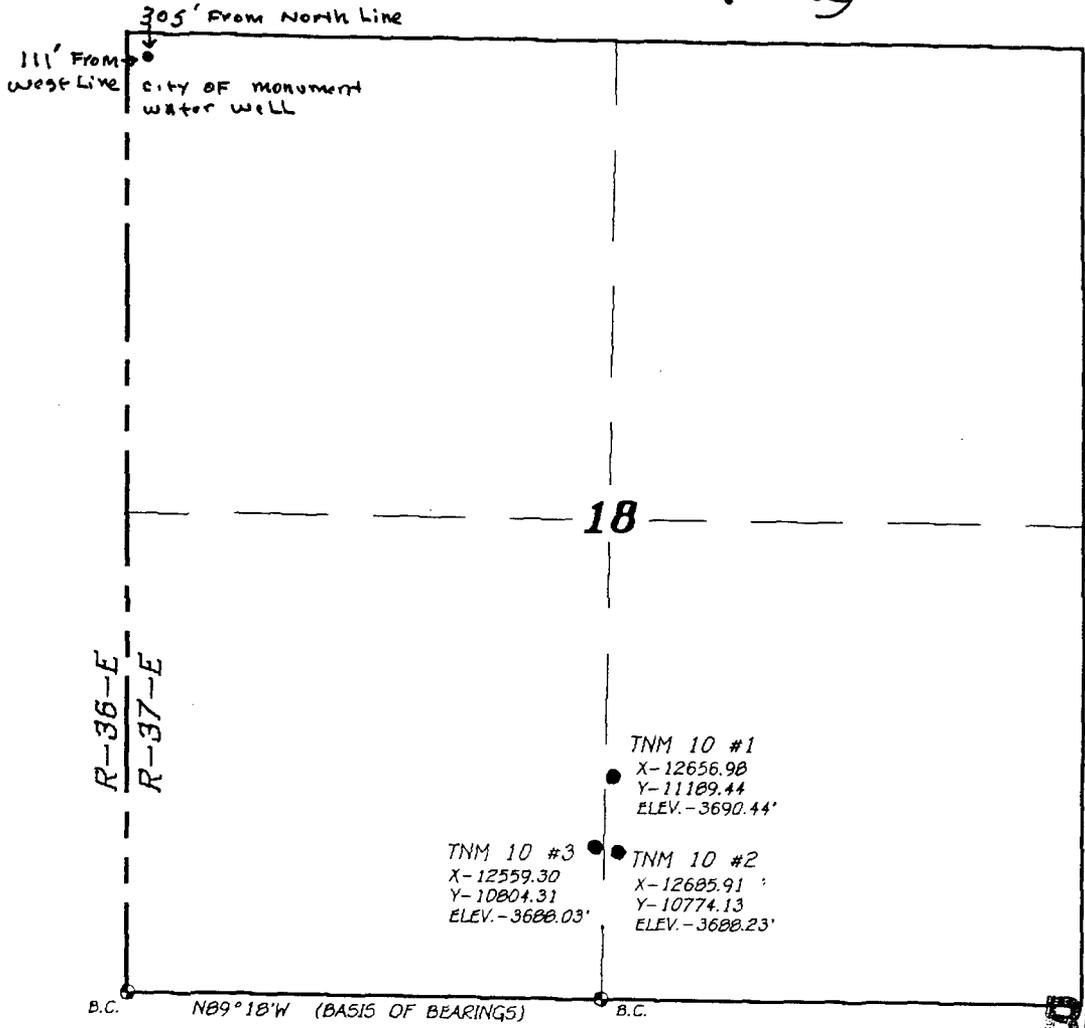
Please find enclosed the map showing the location of the City of Monument's supply well in reference to the remediation project.

Also find attached the info I promised you on Risk-Based closures. Hope you find it helpful.

cc:  
attachments-2

SECTION 18, TOWNSHIP 19 SOUTH, RANGE 37 EAST, N.M.P.M.,  
LEA COUNTY, NEW MEXICO.

(Info Added 1/22/96 J.A. Savoie  
Data - Johnny Hernandez State Eng. Office)

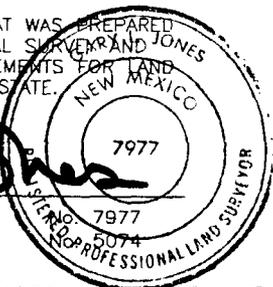


RECEIVED  
JAN 22 1996  
STATE ENGINEERING OFFICE



I HEREBY CERTIFY THAT THIS PLAT WAS PREPARED FROM FIELD NOTES OF AN ACTUAL SURVEY AND MEETS OR EXCEEDS ALL REQUIREMENTS FOR LAND SURVEYS AS SPECIFIED BY THIS STATE.

*Gary L. Jones*  
GARY L. JONES N.M. P.S.  
TEXAS P.L.S.



**BASIN SURVEYS** P.O. BOX 1786-HOBBS, NEW MEXICO

**TEXAS - NEW MEXICO PIPELINE CO.**

REF:

SURVEY OF THE MONITOR WELLS IN SECTION 18, TOWNSHIP 19 SOUTH, RANGE 37 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.

Bill,

WESS with Env. Spill HAS Almost  
Completed the rest of the DATA Collected  
During the Storm WATER Discharge  
Sept & Oct - 1995 I will Forward this  
Data upon Completion

J. L. (Tony) Scum

3/26/96

CONSENSUS DIVISION  
RECEIVED  
SS MAR 27 AM 8 52

FILED CONSERVATION DIVISION  
RECEIVED

MAR 1 8 52

NMOCD INTER-OFFICE CORRESPONDENCE

TO: Bill Olson-NMOCD Hydrogeologist-Environmental  
Bureau

From: Wayne Price-Environmental Engineer *Wayne Price*

Date: March 1, 1996

Reference: Texas-NM Pipeline Leak TNM-10-95 /Texaco Pit  
2 miles NW of Monument

Subject: TCLP Water Analysis

Comments:

Dear Bill,

Please find enclosed a copy of the analytical of the water sample taken below the crude oil layer in the bottom of the excavated hole.

This water appears to be NON-Hazardous per RCRA.

cc: Jerry Sexton-NMOCD District I Supervisor  
Gary Wink-NMOCD District I Field Rep. II

attachments-1



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

RECEIVING DATE: 02/09/96  
SAMPLE TYPE: WATER  
PROJECT : TNM-10-95  
FIELD CODE: TNM-10-95 PIT

ANALYSIS DATE: 02/14/96  
SAMPLING DATE: 02/09/96  
SAMPLE CONDITION: Intact/Iced

TCLP VOLATILES (ppm)	SAMPLE 6732	PQL	BLANK	%EA	%IA
1,1-Dichloroethene	ND	0.005	ND	116	100
2-Butanone	0.131	0.100	ND		104
Chloroform	ND	0.005	ND		106
Benzene	ND	0.005	ND		106
1,2-Dichloroethane	ND	0.005	ND		106
Vinyl Chloride	ND	0.005	ND	100	105
Carbon Tetrachloride	ND	0.005	ND		101
Trichloroethene	ND	0.005	ND		98
Tetrachloroethene	ND	0.005	ND		115
Chlorobenzene	ND	0.005	ND	94	103
1,4-Dichlorobenzene	ND	0.005	ND		95

SYSTEM MONITORING COMPOUNDS	% RECOVERY
dibromofluoromethane	89
toluene-d8	120
4-bromofluorobenzene	90

ND = < PQL  
PQL = PRACTICAL QUANTITATION LIMIT  
Methods: EPA SW 846-8240, 1311

RECEIVED

FEB 20 1996

JOE HUBBS  
OFFICE

  
Michael R. Fowler

2-23-96  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL. NM 88252  
FAX: 505-395-2636

Receiving Date: 02/09/96  
Sample Type: WATER  
Project: TNM-10-95  
Project Location: 2 MILES NORTH OF MONUMENT

Analysis Date: 02/21/96  
Sampling Date: 02/09/96  
Sample Condition: Intact/Iced

ELT#	Field Code	REACTIVITY		CORROSIVITY	IGNITABILITY
		H2S	CN-	(s.u.)	
		NON-REACTIVE		NON-CORROSIVE	
		(ppm)	(ppm)		
6732	TNM 10-95 PIT	<10	<2.5	7.05	>140 deg. F
	RPD	0	0	0	0
	% PRECISION	100	100		
	% INSTRUMENT ACCURACY			100	

METHODS: EPA SW-846-2.1.3,2.1.2,2.1.1

  
Michael R. Fowler

2-23-96  
Date

RECEIVED

FEB 20 1996

JOHN HOBBS  
OFFICE

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

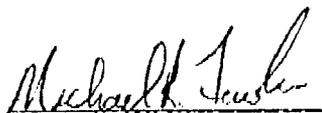
TEXAS NEW MEXICO PIPE LINE COMPANY  
ATTN: MR. JOHN A. SAVOIE  
P.O. BOX 1030  
JAL, NM 88252  
FAX: 505-395-2636

RECEIVING DATE: 02/09/96  
SAMPLE TYPE: WATER  
PROJECT #: TNM-10-95  
PROJECT LOCATION: 2 MILES NORTH OF MONUMENT

ANALYSIS DATE: 02/13/96  
SAMPLING DATE: 02/09/96  
SAMPLE CONDITION: INTACT/COOL

ELT#	FIELD CODE	TPH (mg/l)
6732	TNM-10-95 PIT	43
	QUALITY CONTROL	58
	TRUE VALUE	60
	% PRECISION	97

Methods: EPA 418.1

  
Michael R. Fowler

2-23-96  
Date

RECEIVED

FEB 20 1996

OLD HUBBS  
OFFICE

OIL CONSERVATION DIVISION  
RECEIVED

FEB 19 8 52 AM '94

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

Telephone

Personal

Time

~ 3:00 pm

Date

FEB 2, 1994

Originating Party

Other Parties

TONY SAVOIE -

Subject

TNM # 10-95

Discussion

FRAC TANK IS LEAKING, WANTED PERMISSION  
TO MOVE NON-EXEMPT WATER TO SAL

TANK HAS LINER UNDER IT & BERM - NO GROUND  
WATER THREAT!

Conclusions or Agreements

RECOMMEND TO TONY TO CHANGE OUT TANKS ON-SITE  
WATER TRANSPORTATION COULD BE A PROBLEM IF  
HAZ!

Distribution

BILL OLSEN  
TECH. SECTION

Signed

Submit 3 Copies to Appropriate District Office

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-103 Revised 1-1-89

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

OIL CONSERVATION DIVISION 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

DISTRICT II P.O. Drawer 00, Artesia, NM 88210

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

WELL API NO. 5. Indicate Type of Lease STATE [ ] FEE [ ] 6. State (N) & Gas Lease No. 7. Lease Name or Unit Agreement Name C. J. Sauners Federal Battery # 1 8. Well No. 9. Pool name or Wildcat

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.) 1. Type of Well: Pipeline Leak 2. Name of Operator: Texas New Mexico Pipeline Company 3. Address of Operator: P.O. Box 60028, San Angelo, Texas 4. Well Location: Section 18 Township 19S Range 37E NMPM Lea County 10. Elevation (Show whether DF, RKB, RT, GR, etc.)

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data NOTICE OF INTENTION TO: PERFORM REMEDIAL WORK [X] PLUG AND ABANDON [ ] TEMPORARILY ABANDON [ ] CHANGE PLANS [ ] PULL OR ALTER CASING [ ] OTHER [ ] SUBSEQUENT REPORT OF: REMEDIAL WORK [ ] ALTERING CASING [ ] COMMENCE DRILLING OPNS. [ ] PLUG AND ABANDONMENT [ ] CASING TEST AND CEMENT JOB [ ] OTHER [ ]

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103. 1. It is our intent to do three soil borings and/or three temporary monitor wells to further delineate the soil contamination in the east walls of the pit. 2. It is also our intent to dig a recovery ditch in the bottom of the pit to recover the free fluids associated with the pipeline leak.

SEE ATTACHED MAP & WORK PLAN

I hereby certify that the information above is true and complete to the best of my knowledge and belief. SIGNATURE: Tony Savoie TITLE: Senior Tech DATE: 1/15/96 TYPE OR PRINT NAME TELEPHONE NO.

(This space for State Use)

APPROVED BY: TITLE: DATE: REASONS OF APPROVAL, IF ANY:

## FAX TRANSMISSION

## ENVIRONMENTAL SPILL CONTROL, INC.

Phone (505) 392-6167

Fax (505) 397-5085

1203 West Dunnam

P.O. Box 5890

Hobbs, New Mexico 88241

Date 1-17 1996Fax Number 1-505-827-8177To B. L. BrownWith New Mexico Oil Conservation DivisionFrom Edy GaltPage 1 of 2 Pages

Message Attached is the C-103 For the  
Subsurface Investigation/ Product Recovery Trench  
at the Leaning site.  
We are scheduled to begin work at the  
site tomorrow 1-17-96.

# FAX TRANSMISSION

## ENVIRONMENTAL SPILL CONTROL, INC.

Phone (505) 392-6167

Fax (505) 397-5085

1203 West Dunnam

P.O. Box 5890

Hobbs, New Mexico 88241

Date 1/28 1996

Fax Number 1-505-827-9177

To Bill Benson

With New Mexico Oil Conservation Division

From \_\_\_\_\_

Page 1 of 6 Pages

Message \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



NM GENERAL CONTRACTORS LIC. #55538  
TX DRILLING LIC. #0000M  
NM DRILLING LIC. #WD 1349

1101 BOK 5890 ★ HOBBS, NM 88241  
PHONE (505) 392-6167 ★ FAX (505) 387-5085

January 16, 1996

Texas-New Mexico Pipe Line Company  
P.O. Box 1030  
Jul, New Mexico 88252

Attn: Mr. Tony Savole

Re: **Subsurface Investigation / Product Recovery Trench  
Former Pit and Pipeline Leak Site, Saunders Federal Battery  
NW SE 18 T19S R37E, Lea County, New Mexico.**

Dear Mr. Savole:

Environmental Spill Control, Incorporated ("ESC") is pleased to present this workplan to conduct a subsurface investigation and install a product recovery trench at the former pit and pipeline leak site located south of the Saunders Lease tank battery, Lea County, New Mexico. The purpose of the subsurface investigation is to delineate the extent and magnitude of hydrocarbon impact to the soils and possibly the groundwater along the eastern wall of excavation. The purpose of the product recovery trench is to recover the free crude oil previously identified at the site.

#### WORK PLAN

##### TASK 1: Delineation of Soil Contamination along the east wall of the excavation

- 1) Drill three to six soil borings using an air rotary rig along the east wall of the existing excavation to delineate the extent of hydrocarbon impact to the soils (Figure 1). The first three borings (labeled A, B, and C) will be located approximately 20 feet east of the excavation. If the field screening results (VOCs and TPH) from the borings indicate that the extent of hydrocarbon contamination has been delineated (OVA readings < 100 ppm and TPH readings < 200 ppm), the borings will be converted to temporary monitor wells to monitor groundwater quality along the edge of the impacted area. Should we

11:11 AM

encounter soil contamination in borings A B or C, we will move eastward approximately 15 feet from the impacted boring location and drill soil borings (labeled D, E, or F) to complete delineation. Only the three borings completing delineation will be converted to temporary monitor wells. The rest of the borings will be plugged with non-shrinking grout.

- 2) The borings will be drilled to a depth of 45 feet and converted to temporary monitor wells. The wells will be constructed of 2 inch flush thread schedule 40 PVC casing and 0.02-inch factory slotted screen. The well will be designed to screen a 10 foot interval with the top of the screen set 5 feet above the water table to monitor for free-floating hydrocarbons and penetrate the upper 5 feet of the aquifer to provide sufficient yield for development and water sampling. Gauging data from the existing monitor wells indicates the depth to groundwater will be approximately 39 feet below ground surface. Each monitor well will be completed by placing a sand-pack in the annular space between the PVC screen/casing and the borehole. The sand pack will extend from the bottom of the boring to a minimum of one foot above the casing/screen junction. The temporary wells will be completed as above-ground wells with a two foot thick seal of hydrated bentonite pellets placed even with the ground surface to protect ground water.

#### **TASK 2: Installation of Product Recovery System in the Bottom of the Excavation**

- 1) Excavate a "T" shaped trench in the bottom of the existing pit with a backhoe to use as a product recovery trench (Figure 1). The trench will be designed to act as a sump and extend a pump will be installed to create a slight cone of depression and induce gravity flow of free crude oil from the surrounding soils into the recovery trench. Pump rates, duration, and depth set in the trench will be monitored and adjusted to maximize crude oil recovery while minimizing water recovery. the crude oil and water recovered during pumping will be captured and stored in tank on-site pending reclaiming/disposal in accordance with NMOCD regulations.
- 2) Three temporarily monitor wells, constructed of 2-inch schedule 40 PVC, will be installed in the existing borings drilled in the bottom of the excavation. The wells will be used to monitor water level/drawdown and product thickness during recovery operations. The remaining boreholes (left open from our previous investigation) will be filled with non-shrinking grout.

If you have any questions or desire further information, please contact us at any time.

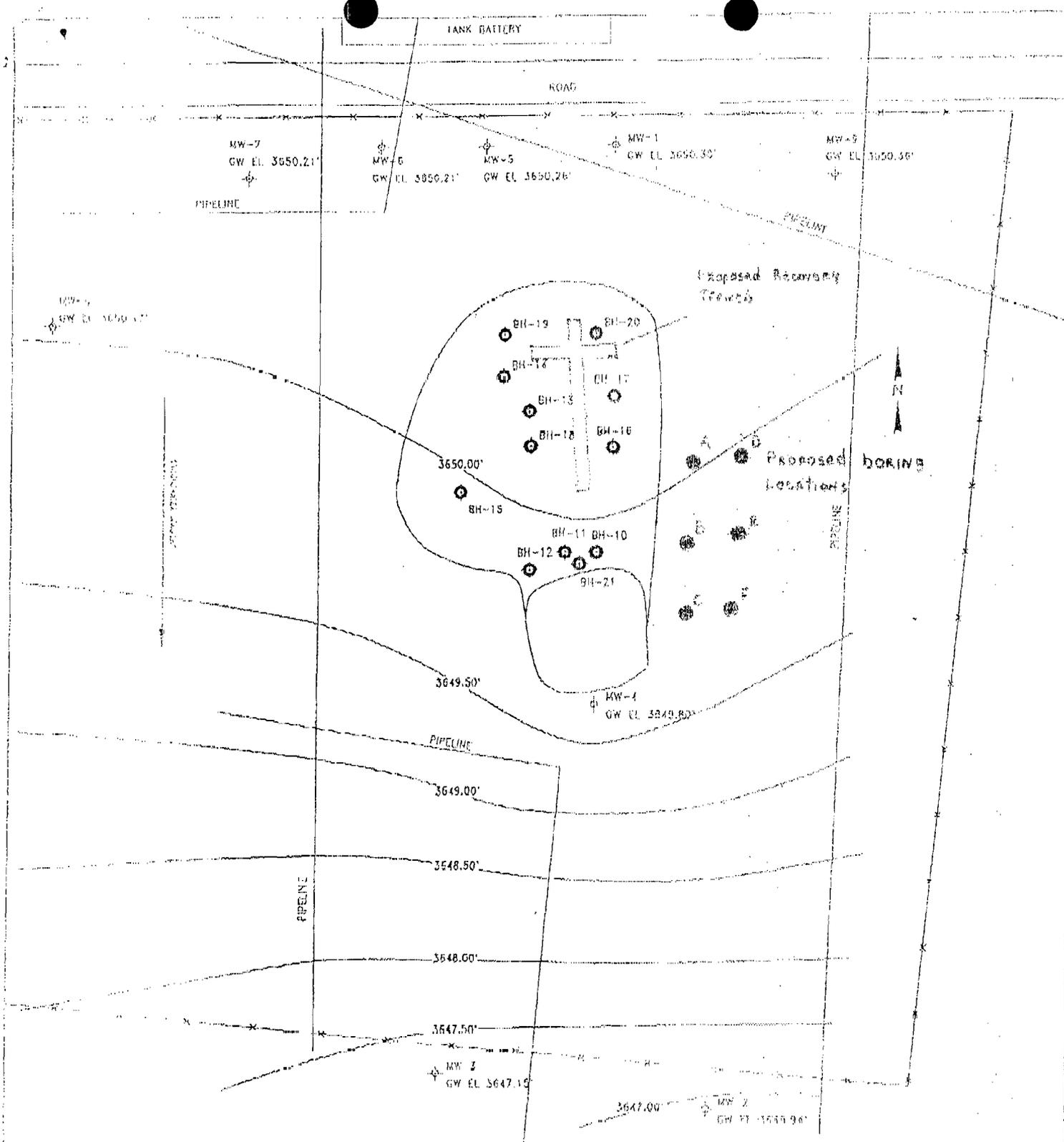
Best regards,

**ENVIRONMENTAL SPILL CONTROL, INC.**

*F. Wesley Root*

F. Wesley Root  
Division Manager  
Hydrology/Geology

cc: Mr. Bill Olson, NMOCD  
Mr. Wayne Price, NMOCD  
Mr. Allen Hodge, ESC



 BORING LOCATION  
 MONITOR WELL  
 GROUNDWATER ELEVATION MEASURED ON 1-4-96  
 CONTOUR INTERVAL = 0.50 FEET

**TEXACO Inc.**   
 SAUNDERS EXCAVATION  
 GROUNDWATER ELEVATION  
 NWA/SEA SEC 18, T19S, R37E  
 LEA Co., NEW MEXICO  
 DATE: 02/95 DRAWN BY: REV DATE: 10/96 BY:

SCALE: 1" = 50' JOB #: 133



OIL CONSERVATION DIVISION

RECEIVED

1995 DEC 28 AM 8 52

**NMOCD Inter-Correspondence**

To: Jerry Sexton-District I Supervisor

From: Wayne Price-Environmental Engineer District I *Wayne Price*

Date: Dec. 26, 1995

Reference: Texaco C.J. Saunders Pit-TNMPL Line Leak #10  
NW of Monument, NM.

Subject: Safety Issues

Comments:

Dear Jerry,

The other day Larry Lehman with Texaco called and was concerned about some OSHA type safety issues. Evidently TNMPL indicated to him that since they were approved by the NMOCD for the on-site investigation and remediation plan that somehow it superseded any other regulations.

I informed Larry that NMOCD does not have regulatory authority over such issues.

Please find attached a letter I sent TNMPL concerning additional reporting requirements and our standard disclaimer statement. I took the liberty to copy Larry Lehman also.

**cc: Bill Olson-Hydrogeologist, Santa Fe**



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
HOBBS DISTRICT OFFICE

POST OFFICE BOX 198  
HOBBS, NEW MEXICO 88240  
(505) 393-6161

December 21, 1995

J.A. "Tony" Savoie  
Texas-New Mexico Pipe Line Co.  
P.O. Box 1030  
Jal, NM 88252

Re: Texas-New Mexico Pipeline Co. (TNMPL) Spill & Remediation Site  
TNMPL #10 located 2 miles NW of Monument, NM  
nw/4 se/4 sec 18-Ts 19s-R 37e

Dear Tony,

It has been brought to the attention of the New Mexico Oil Conservation Division (NMOCD) that TNMPL has done additional drilling in the excavated area to determine additional horizontal and vertical extent of the contamination.

Our files in District I indicated you were given approval from our Santa Fe office to install monitor wells for this project. However, after reviewing this Site Assessment Plan there is no mention of this most recent activity. At your earliest opportunity would you please submit a work plan and/or the results of your recent activity for this additional work.

Please submit this information as an addendum to the original plan to Mr. Bill Olson in our Santa Fe office and sent one copy to the Hobbs office.

Please be advised the NMOCD approval does not relieve TNMPL of liability if contamination exist which is beyond the scope of the work plan or, if the activities fail to adequately remediate contamination related to TNMPL's activities. In addition, NMOCD approval does not relieve TNMPL of responsibility for compliance with any other Federal, State or Local laws and/or regulations.

If you have any question, please call me at 505-393-6161.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor  
Bill Olson-NMOCD Santa Fe  
Mr. Edwin H. Gripp-TNMPL ✓  
Mr. J.W. Chapman-TNMPL ✓



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION  
HOBBS DISTRICT OFFICE

RECEIVED

1995 DEC 26 AM 8 52

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

December 21, 1995

J.A. "Tony" Savoie  
Texas-New Mexico Pipe Line Co.  
P.O. Box 1030  
Jal, NM 88252

Re: Texas-New Mexico Pipeline Co. (TNMPL) Spill & Remediation Site  
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nw/4 se/4 sec 18-Ts 19s-R 37e

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If you have any question, please call me at 505-393-6161.

Sincerely Yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor  
~~Bill Olson-NMOCD Santa Fe~~  
Mr. Edwin H. Gripp-TNMPL  
Mr. J.W. Chapman-TNMPL



## FAX TRANSMISSION

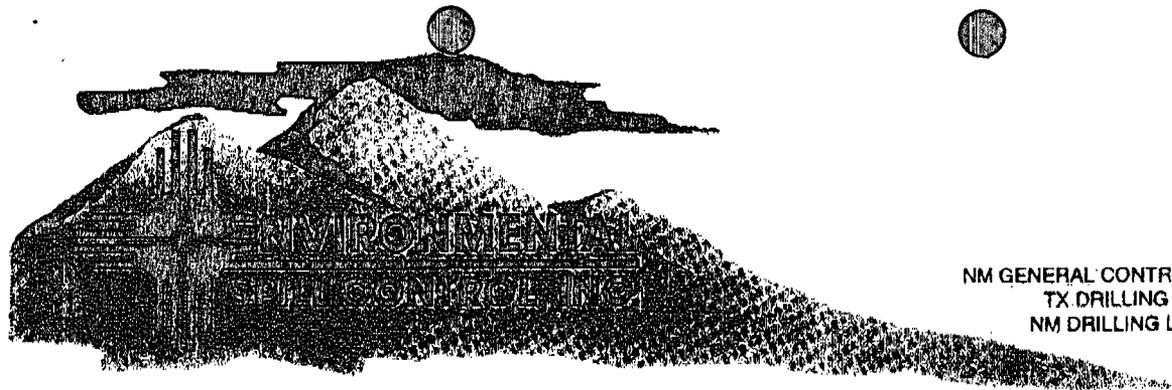
## ENVIRONMENTAL SPILL CONTROL, INC.

Phone (505) 392-6167  
Fax (505) 397-5085  
1203 West Dunnam  
P.O. Box 5890  
Hobbs, New Mexico 88241

Date 10-5 1995  
Fax Number 505-827-7153 Phone 505-827-7154  
To Bill Olson  
With New Mexico Oil Conservation Division  
From Wes Raut  
Page 1 of 8 Pages

Message Please review the attached WORKPLAN  
for additional subsurface investigation to be  
performed on Friday 10-6-95. The scope of work  
has been approved by Texaco USA & Texas-  
New Mexico Pipeline Co.

Bill Olson Fax 397-8177  
827-7133



NM GENERAL CONTRACTORS LIC. #55535  
TX DRILLING LIC. #5005M  
NM DRILLING LIC. #WD 1349

P.O. BOX 5890 ★ HOBBS, NM 88241

PHONE (505) 392-6167 ★ FAX (505) 397-5085

October 3, 1995

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

Attn: Mr. Aaron Dobbs

**Re: Workplan for a Subsurface Investigation of the Former Pit and Pipeline Leak Site,  
NW SE 18 T19S R37E, Lea County, New Mexico.**

Dear Mr. Dobbs:

Environmental Spill Control, Incorporated ("ESC") is pleased to present this workplan to conduct a subsurface investigation of the former pit and pipeline leak site located south of the Saunders Lease tank battery, Lea County, New Mexico. The purpose of this investigation is to delineate the extent and magnitude of hydrocarbon impact to the soils and possibly the groundwater beneath the site.

Previous investigations include excavation operations to remove hydrocarbon impacted soils resulting from either a recent pipeline leak or a former pit identified during the investigations, soil borings to delineate the impacted soils, and the installation of three monitor wells to assess potential groundwater impact.

The subsurface geology at the site can be divided into six separate units. The upper unit consists of approximately 10 feet of calcareous sandy clay loam overlying a 15 to 20 foot thick interval calcareous sand (caliche) containing highly fractured limestone and sandstone lenses. This caliche unit is underlain by a 2 to 3 foot thick indurated siliceous sandstone layer. The sandstone is highly fractured and underlain by a 3 to 5 foot thick, slightly calcareous fine-grained sand. The sand interval is underlain by a second indurated layer consisting of a 1 to 3 foot thick limestone. Fine-grained non-calcareous to slightly calcareous sands underlie the limestone unit with groundwater encountered at a depth of approximately 37.5 feet below ground surface.

10102133.SAM

Excavation operations to date have removed a majority of the impacted soils above an indurated sandstone layer encountered at a depth of approximately 28 feet below ground surface. No crude oil seeps are currently visible on the walls or floor of the excavation, however crude oil staining is present on the upper surface of the sandstone in an area approximately 85 feet long and 40 feet wide. One of the major objectives of this investigation is to delineate any impact below the sandstone layer.

The three existing monitor wells were placed in a triangular configuration around the excavation with monitor well MW-1 located approximately 220 feet north of the deepest point of the excavation. Monitor wells MW-2 and MW-3 are located approximately 220 feet downgradient from the excavation. Analytical results from two groundwater sampling events have identified no evidence of hydrocarbon impact to the groundwater. Constituents analyzed for include BTEX, semi-volatile organics and total metals.

## WORK PLAN

### TASK 1: Soil Sampling Operations

- 1) Drill five to seven soil borings using an air rotary rig in the bottom of the excavation to delineate the extent of hydrocarbon impact to the soils. The borings will be drilled so as to penetrate the indurated sandstone forming the excavation bottom and underlying softer sand, but terminate prior to penetrating the lower sandstone layer immediately above groundwater (total depth of approximately seven to ten feet). The total number of borings will be determined by the magnitude of hydrocarbon impact identified. The soils will be considered delineated at depth when volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) exhibited by the boring samples measure less than 100 ppm.
- 2) Drill one soil boring using air rotary immediately downgradient from the excavation (approximately 25 feet south of the south wall of the excavation). The boring will be drilled to a depth of 55 feet and converted to a monitor well. The decision to install either a 2 inch or 4 inch PVC monitor well will be made in the field based on the magnitude of hydrocarbon impact encountered during drilling operations. Gauging data from the existing monitor wells indicated the depth to groundwater will be 37.5 feet below ground surface. The well will be designed to screen a 20 foot interval with the top of the screen set 5 feet above the water table to monitor for free-floating hydrocarbons. The well will penetrate the upper 15 feet of the aquifer to provide sufficient yield for development and water sampling.
- 3) During drilling operations, monitor the drill cuttings and selectively collect split-spoon samples to identify the extent of crude oil impacted soils and water bearing units. Soil and cutting samples will be field screened for VOCs using an organic vapor analyzer (OVA). The samples will be screened using the head space method described in the New

Mexico Oil Conservation Division's Unlined Surface Impoundment Closure Guidelines. Selected samples will be analyzed in the field for TPH using a GAC Mega TPH analyzer. An experienced geologist will be on location to log the well and collect soil samples. Drill cuttings will be staged on the site with the impacted soils previously excavated.

- 4) A minimum of two split-spoon samples from each boring will be collected for laboratory analysis, the sampled interval exhibiting the greatest head space reading and the sample collected from the bottom of the soil boring or immediately above groundwater. A core barrel will be available for use, should conditions, such as competent rock result in no sample recovery using a driven split-spoon. The soil samples will be submitted to Cardinal Laboratories in Hobbs for benzene, ethyl-benzene, toluene, and xylenes (BTEX) and TPH analysis.

#### **TASK 2: Groundwater Monitoring**

- 1) A temporarily monitor well constructed of 2-inch schedule 40 PVC will be installed in one of the borings drilled in the bottom of the excavation. If subsurface conditions indicate that the ground water has been impacted, additional temporary wells may be installed to delineate the plume. The well will be designed to screen a 10 foot interval with the top of the screen set 1 foot above the water table to monitor for free-floating hydrocarbons. A bentonite plug will be set immediately above the screened interval and extend across the lower limestone layer to prevent potential groundwater contamination by migration down the wellbore.
- 2) Gauge, develop, and sample the two monitor wells. The wells will be aggressively developed to induce free-floating crude (if present) into the well bore. If no free-floating crude is observed, the well will be sampled for BTEX and TPH. Development water generated during sampling will be captured and stored on site pending disposal.

## GENERAL PROCEDURES

### Monitor Well Construction

Monitor wells will be constructed of schedule 40 PVC casing and factory slotted screen (either 0.01 or 0.02 inch slot size) using threaded flush-joint pipe with o-ring seals. Depending upon site specific conditions, the wells will generally be constructed of 15 to 20 feet of well screen placed so at least 5 feet of the screen will extend above the static water table with casing extending from the screened interval to surface grade. A locking cap will be placed on each monitor well. Each monitor well will be completed by placing a sand-pack in the annular space between the PVC screen/casing and the borehole. The sand pack will extend from the bottom of the boring to a minimum of one foot above the casing/screen junction. An added four foot thick seal of hydrated bentonite pellets will be placed above the sand pack. Non-shrinking grout will be used to fill the remainder of the annular space and either a flush mount manhole or a monument type cover will be concreted within a 4 foot by 4 foot pad to protect the monitor well.

### Decontamination

A steam sprayer will be used for decontamination of all sampling equipment (split-spoon; between each sample) and drilling equipment (drill pipe, bit, etc.; between each boring location). Unless obvious crude oil impact is observed during drilling operations, the decontamination/rinsate water will be allowed run off on to the ground surface.

### Health and Safety Plan

A site specific Health and Safety plan will be prepared in accordance with OSHA standards for use by all on-site personnel prior to beginning the investigation. Level D personal protective equipment (PPE) will be used, which includes the following: hard hat, safety glasses, steel toed boots, ear plugs, nitrile gloves for handling sampling equipment. All of our employees meet the 40 hour HAZWOPER training required per 29 CFR 1910.120.

### Soil Sample Collection and Analyses

An environmental geologist will be on site to describe the soils encountered, prepare boring logs, and to obtain soil samples for analysis. Soil will be removed from the sampling devices using disposable nitrile gloves and/or properly decontaminated sampling trowels.

Soil samples will be collected from each boring using decontaminated (washed in Liquinox detergent and rinsed in distilled water) five foot core barrel or split spoon. Controlled drilling/sampling measures will be implemented such that no more than five

feet of sample has been collected prior to the environmental geologist placing the samples in sample containers to reduce potential volatilization.

The soil samples will be split with one-half of the sample being field screened with a flame ionization detector (FID) organic vapor analyzer (OVA). The OVA detects volatile organic compounds from petroleum and non-petroleum sources. The other half of the sample will be placed in a glass jar with a teflon-lined lid, custody sealed, stored at 4°C as per EPA protocol (EPA 600/4-82-029), and transported to the laboratory with complete chain-of-custody documentation.

### **Water Sample Collection and Analyses**

The completed monitor wells will be surveyed to determine the relative ground surface and top of casing elevations for each well. Water level measurements will be collected from each well using a decontaminated electric water level indicator.

Each monitor well will be developed and purged utilizing a 3-inch decontaminated (using Liquinox detergent and distilled water rinse) PVC bailer. New rope will be tied to the bailer prior to the development of each well to prevent cross-contamination. Each well will be surge bailed to ensure proper filter pack arrangement and that fines created during the drilling process will be purged from the well. A minimum of three borehole volumes of water will be purged from the monitor wells. Purging will continue until the parameters of pH, temperature, and conductivity have stabilized. Groundwater samples will then be obtained from the well using a dedicated, disposable clear PVC bailer.

The sampled groundwater will be placed into HCL-preserved 40 ml septum sealed VOA vials, and one liter amber jars for volatile organic and TPH analysis, respectively. The sample containers will be labeled, sealed with QA/QC seals, and transported on ice to the laboratory for analysis. A chain-of-custody which documents sample collection times and delivery to the laboratory will be completed for each set of samples.

### **Report Preparation**

A report will be prepared to summarize the findings. The report will include site soil/groundwater characterization, description of investigation procedures, drilling logs, analytical results, COC, and QA/QC procedures. Discussion and conclusions based on the findings will be presented in a separate cover letter.

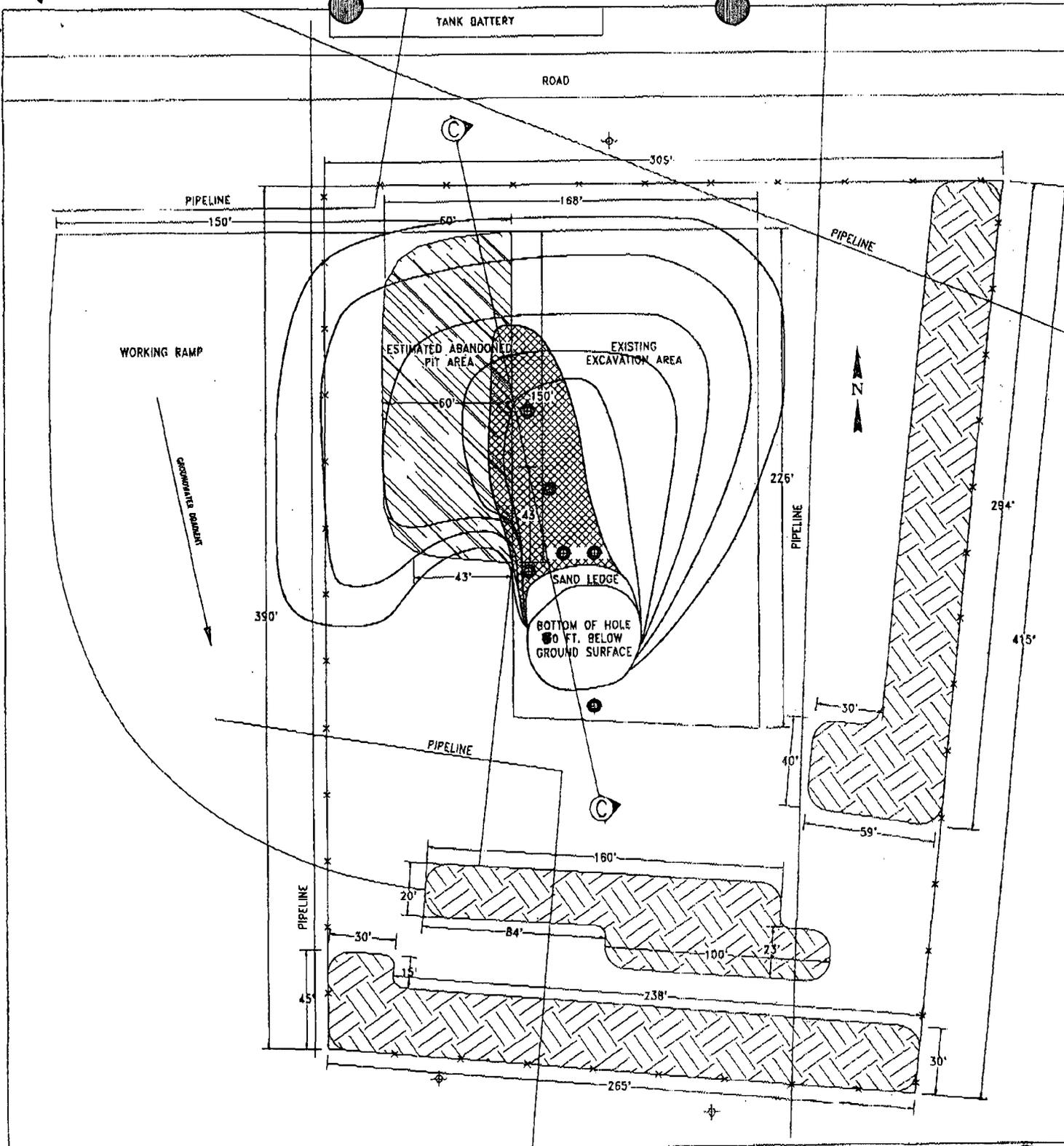
If you have any questions or desire further information, please contact us at any time.

Best regards,  
**ENVIRONMENTAL SPILL CONTROL, INC.**

*F. Wesley Root*

F. Wesley Root  
Division Manager  
Hydrology/Geology

cc: Mr. Tony Savoie, Texas-New Mexico Pipe Line Company  
Mr. Eddie Slavens, ESC  
Mr. Allen Hodge, ESC



- BORING LOCATION
- MONITOR WELL
- EXCAVATED EARTH APPROXIMATELY 20' HIGH
- HYDROCARBON STAINED SOIL


**ENVIRONMENTAL**  
**SPILL CONTROL, Inc.**  
 PHONE (505) 392-6167  
 FAX (505) 397-9083

**TEXACO Inc.** 

**SAUNDERS EXCAVATION**  
**PLAN OF PROPOSED**  
**SOIL BORINGS**  
 NW4/SE4 SEC 18, T19S, R37E  
 LEA Co., NEW MEXICO

DATE: 7-24-95	DRAWN M.F.G.	REV. DATE 10-4-95	DIV
SCALE: 1" = 60'	JOB # 133		
DRAWING 2 OF 2		FILE: SAUNDERS.DWG	

Submit 3 Copies to Appropriate District Office

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-103 Revised 1-1-89

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

OIL CONSERVATION DIVISION 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

DISTRICT II P.O. Drawer DD, Artesia, NM 88210

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

WELL API NO.

5. Indicate Type of Lease STATE [checked] FEG [ ]

6. State Oil & Gas Lease No.

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

7. Lease Name or Unit Agreement Name

1. Type of Well: OIL WELL [ ] GAS WELL [ ] OTHER [ ]

8. Well No.

2. Name of Operator Texas-New Mexico Pipe Line Co.

9. Pool name or Wildcat

3. Address of Operator P.O. Box 60028 San Angelo TX.

4. Well Location Unit Letter : Feet From The Line and Feet From The Line

NW 1/4 Section 18 Township 19 S Range 37 E NMPM Lea County

10. Elevation (Show whether DF, RKB, RT, GR, etc.)

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data. NOTICE OF INTENTION TO: PERFORM REMEDIAL WORK [ ], PLUG AND ABANDON [ ], TEMPORARILY ABANDON [ ], CHANGE PLANS [ ], PULL OR ALTER CASING [ ], OTHER: Discharge Storm Water [ ]. SUBSEQUENT REPORT OF: REMEDIAL WORK [ ], ALTERING CASING [ ], COMMENCE DRILLING OPNS. [ ], PLUG AND ABANDONMENT [ ], CASING TEST AND CEMENT JOB [ ], OTHER: [ ].

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

Remove & discharge to surface approx. 60,000 BLS storm water from TUM site 10 north of monument N.M. All discharge water will be first tested for BTEX, TDS, PH, metals & major ions & cations. During removal, the water will be observed for sheening from the surface of the pit and in a 250hl holding tank prior to discharge to surface. The effluent water will be sampled every 4 hours for BTEX. In the event of sheening or a resulting bad sample the discharge will be terminated. The 3 monitor wells will be sampled & elevation recorded. The discharge area will be observed & documented of any previous soil staining or possible contamination.

Prior to discharge, have called EPA-Region 6 Do not need stormwater permit OR RPA because not disch. to waters of U.S.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. SIGNATURE: John A. Savoie TITLE: Senior Tech DATE: 9/19/95

TYPE OR PRINT NAME: John A. Savoie TELEPHONE NO.: 505-395-2705

(This space for State Use) APPROVED BY: [Signature] TITLE: Geologist IV DATE: 9/19/95

CONDITIONS OF APPROVAL, IF ANY: 1) Submit report on discharges to OCD on completion 2) Report will contain - analyses, total volume, discharge location area

OIL CONSERVATION DIVISION  
RECEIVED

NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

Bill Olson  
Jerry Sexton

Aug 24 AM 8 52

INSPECTION  
CLASSIFICATION  
FACILITY  
HOURS  
QUARTER  
HOURS

Name WAYNE PRICE Date 8/22/95 Miles \_\_\_\_\_ District I  
Time of Departure 7 AM Time of Return 4 PM Car No. G 04

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature [Signature]

TEX MEX P.L. & TEXACO PIT SITE  
SEC 18 - 195 - 37E

CONTRACTOR EXCAVATING CONTAMINATED  
SOIL FROM PIT AREA DOWN ~ 15'

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED

INSPECTION CLASSIFICATION

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

- H = Housekeeping
- P = Plugging
- C = Plugging Cleanup
- T = Well Test
- R = Repair/Workover
- F = Waterflow
- M = Mishap or Spill
- W = Water Contamination
- O = Other

- U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
- R = Inspections relating to Reclamation Fund Activity
- O = Other - Inspections not related to injection or The Reclamation Fund
- E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

- D = Drilling
- P = Production
- I = Injection
- C = Combined prod. inj. operations
- S = SWD
- U = Underground Storage
- G = General Operation
- F = Facility or location
- M = Meeting
- O = Other

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** ~~Tex-New Mex Pipeline spill # 10~~  
**Date:** Tuesday, June 27, 1995 4:47PM  
**Priority:** High

Dear Bill,

Ref: TNMP spill # 10 which is the one located 3 mi. NW of Monument  
sec 18-19s-37e.

During excavation, it appears that TNMP has excavated into an old pit. During my site visit this morning, Wayne Minchew of Texaco E & P indicated to me that Texaco E & P has researched its records and personnel and has determined that this old pit was theirs. The pit was used to discharge waste into from the nearby tank battery which sets to the north. This battery is now operated by Amerado Hess. Mr. Minchew indicated to me that Texaco sold this lease to Amerada but retains the liability for the pit.

Mr. Minchew indicated to me that they are going to use the same contractor that is on site for TNMP to delineate the size of the pit. They are going to drill approximately 6 to 7 bore holes down to the water table. Their time frame for this is to start on Wednesday June 28, 1995.

Please note Texaco has volunteered for this clean-up.

Please advise us on the procedure to use since it appears they are going to drill to the water table.

Thanks!

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Tex-New Mex P.L. spill & Old Texaco Pit  
**Date:** Wednesday, August 09, 1995 2:37PM  
**Priority:** High

Dear Bill,

Per our telephone conversation today I am forwarding the work plan submitted by Texaco for the Pit that is associated with the Tex-New Mex pipe line spill NW of Monument NM. I understand that since ground water has been impacted that your office will handled this submittal.

Thank You!

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** ~~Tex-New Mex Pipeline spill # 10 & 58~~  
**Date:** Monday, June 26, 1995 10:52AM  
**Priority:** High

Dear Bill,

Tony Savoie with TNMP met with Jerry and I this morning. Gave us progress report on monitor well installations and copied us on their site assessment plans.

TNMP requested that small amount of product (Crude Oil) and rain water be allowed to be recycled back into their pipeline system.

They have plans on sampling these wells this week.

Tony is going to be in touch with you this week.

## Bill Olson

---

**From:** Wayne Price  
**To:** Bill Olson  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** ~~Tex-New Mex Pipeline spills 10 & 58~~  
**Date:** Thursday, July 06, 1995 1:28PM  
**Priority:** High

Dear Bill,

Tony Savoie called this morning and gave me a progress report.

Spill # 58- S. of Monument NM: Dug down additional few feet to determine the extent of oil, took additional samples down in hole.

Spill #10- N. of Monument NM: Set a small product recovery system in hole and is recovering product: Advised Tony to call Bill Olson and the State Engineer's office.

Submit 3 Copies to Appropriate District Office

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-103 Revised 1-1-89

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

OIL CONSERVATION DIVISION 310 Old Santa Fe Trail, Room 206 Santa Fe, New Mexico 87503

DISTRICT II P.O. Drawer DD, Artesia, NM 88210

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

WELL API NO.

5. Indicate Type of Lease STATE [X] FEE [ ]

6. State Oil & Gas Lease No.

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE 'APPLICATION FOR PERMIT' (FORM C-101) FOR SUCH PROPOSALS.)

7. Lease Name or Unit Agreement Name Monument Field Ref. TNM-10

1. Type of Well: OIL WELL [ ] GAS WELL [ ] OTHER monitor wells

8. Well No.

2. Name of Operator TEXAS New Mexico Pipeline Co.

9. Pool name or Wildcat

3. Address of Operator P.O. Box 60028 San Angelo TX

4. Well Location Unit Letter : Feet From The Line and Feet From The Line

Section 18 Township 19 S Range 37 E NMPM Lea County

10. Elevation (Show whether DF, RKB, RT, GR, etc.)

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

SUBSEQUENT REPORT OF:

- PERFORM REMEDIAL WORK [ ] PLUG AND ABANDON [ ] REMEDIAL WORK [ ] ALTERING CASING [ ]
TEMPORARILY ABANDON [ ] CHANGE PLANS [ ] COMMENCE DRILLING OPNS. [ ] PLUG AND ABANDONMENT [ ]
PULL OR ALTER CASING [ ] CASING TEST AND CEMENT JOB [ ]
OTHER: Monitor well Installation [X] OTHER: [ ]

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

See Attachments

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE John A. Savoie TITLE Senior Tech DATE 6-19-95

TYPE OR PRINT NAME John A. Savoie TELEPHONE NO.

(This space for State Use) APPROVED BY [Signature] TITLE Geologist IV DATE 6/19/95

CONDITIONS OF APPROVAL, IF ANY:

- 1) Report submitted by August 25, 1995
2) All sampling & analysis by EPA Methods
3) At least 5 feet of well screen above water table.

SITE ASSESSMENT  
for  
TEXAS-NEW MEXICO PIPE LINE COMPANY  
MONUMENT FIELD  
2 MILES NORTH OF MONUMENT, NEW MEXICO

### 1.0 BACKGROUND

This plan is being prepared by Texas-New Mexico Pipe Line Company (TNMPLCO) for review by the New Mexico Oil Conservation Division (OCD) prior to implementation of a plan to evaluate near surface stratigraphy and groundwater conditions in the vicinity of a crude oil spill site (reference TNM-10).

### 2.0 LOCATION

The spill is located in section 18, township 19S, range 37E, in Lea County 2 miles north of Monument, New Mexico (Figure 1).

### 3.0 WORK PLAN

Soil borings will be made in at least three locations. Information from the borings will be used to determine the local stratigraphy, depth to groundwater and presence of perched water tables. Three monitor wells will be installed, one upgradient and two downgradient (Figure 2).

#### 3.1 Soil Sampling

Soil samples will be collected continuously or at approximate five foot intervals and will be collected with a split spoon sampler or continuous core barrel. In unstable soils or rock, which cannot be sampled in this manner, cuttings will be collected. Samples will be placed in jars and head space readings will be determined. Two samples will be collected from each boring for laboratory analyses, one from the interval with the highest head space reading and one immediately above the water table. Samples will be analyzed for:

TPH and  
BTEX

#### 3.2 Monitor Well Installation

Monitoring wells will be constructed as depicted in Figure 3. Well materials will consist of four inch PVC casing and screen and will be assembled without solvents or glue. The depth of the wells will be determined on site as a result of the drilling program. Wells will be constructed with 20 feet of screen with the screened interval placed across the water table.

#### 3.3 Groundwater Sampling

The three wells will be sampled. At least three well volumes of water will be purged from the wells prior to sampling. Samples will be submitted to a laboratory and analyzed for:

BTEX,  
Semi-volatile organics, and  
metals.

REF. TNM-10-1995

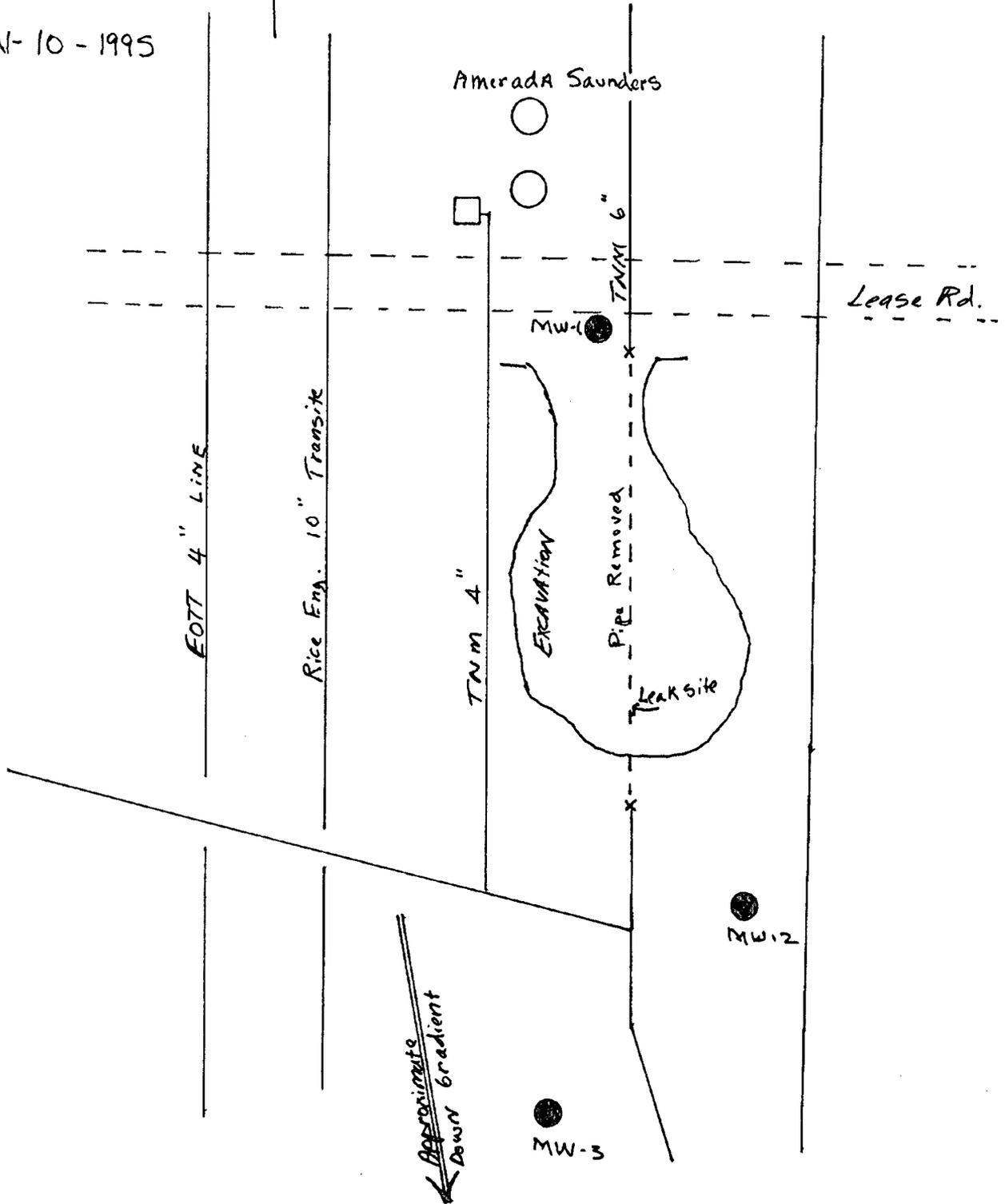


Figure 2. Monitoring well location map

# Texas-New Mexico Pipe Line Inc

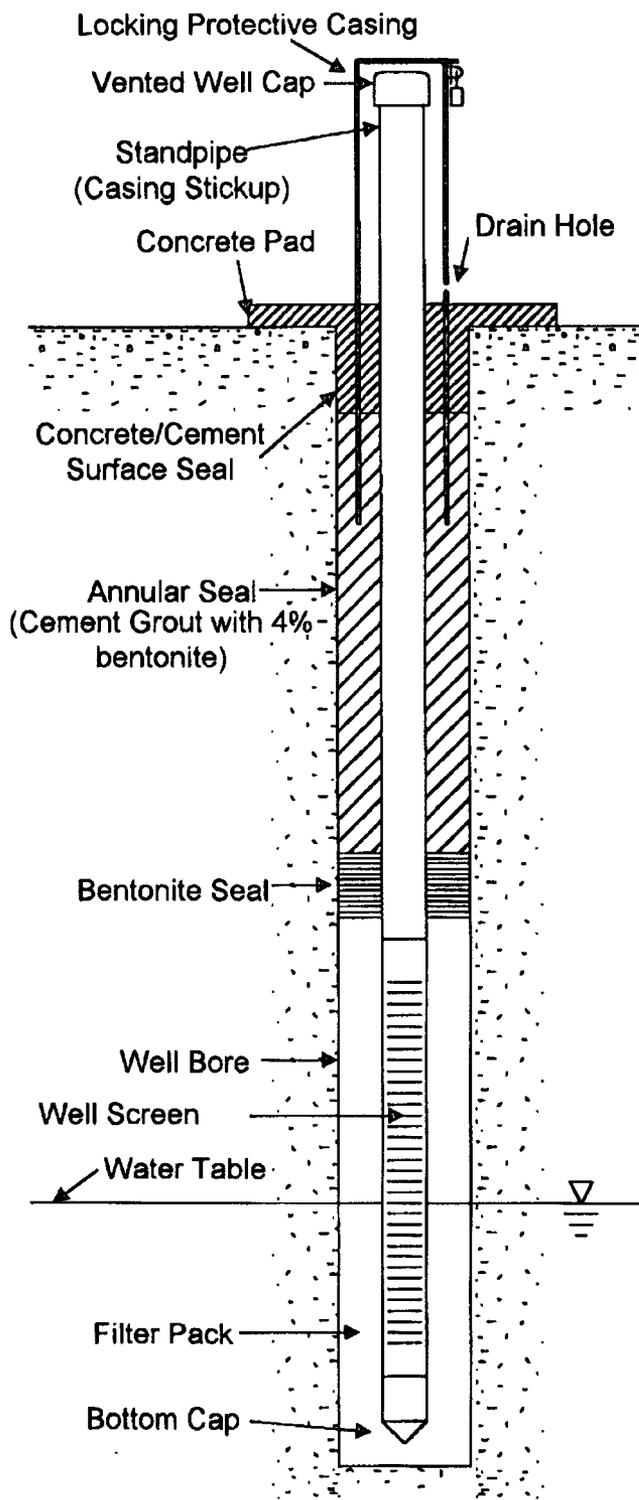


Figure 3. Monitoring well construction



**RECEIVED**

JUN 28 1995

Environmental Bureau  
Oil Conservation Division

OIL CONSERVATION DIVISION  
RECEIVED

'95 JUN 27 AM 8 52

DATE: June 20, 1995

TO: Roger Anderson  
New Mexico Oil Conservation Division/ Environmental Division

FROM: John A. Savoie  
Texas-New Mexico Pipe Line Company

This letter is to confirm our conversation of June 14, 1995 at which time it was reported to Mr. Bill Olson our findings in reference to a spill cleanup that was in progress approximately 2 miles north of Monument New Mexico in Section 18, T19s, R37E. Texas New Mexico Pipe Line Company while trying to determine the oil saturation depth of the spill mentioned above dug into an area of soil very moist with water at depth of 49 feet. Records on file indicated that the ground water level for that area was approximately 108 feet. We ceased excavations at that site and began a process of setting up some drilling operations in the area. We plan to begin drilling some monitor wells in the area today June 20, 1995 to help us in an assessment of the site and develop plans for remediation as needed.

John A. Savoie

c.c Wayne Price

NM OOD

FROM: Wayne Price

TO: Jerry Sexton

CC: Gary Wink  
Wayne Price  
Bill Olson

OIL CONSERVATION DIVISION  
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DATE: 06-15-95  
TIME: 14:03

SUBJECT: Texas New-Mex Pipeline Leak Sites  
PRIORITY: 4  
ATTACHMENTS:

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Dear Jerry,

Texas New-Mex Pipeline Co. is planning on bringing in their hydrogeologist next week of June 19, 1995. They have plans to drill monitor wells to determine the extent of the contamination at both sites; Tony Savoie has notified NMOCD Santa Fe on the possible ground water contamination at both sites.

TNMP # 58-1994 is 1 mi. s of Monument, NM and just on the west side of the road. (On Jim Copper Ranch).

TNMP # 10-1995 is 3 mi. NW of Monument, NM located in 18-19-37.

If you need the file it will be on my desk file sorter.

Thanks, see you when I get back.  
=====

CC: SPERRY STAFFION  
DICK OLSON

OIL CONSERVATION DIVISION  
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NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

INSPECTION  
CLASSIFICATION  
FACILITY  
HOURS  
QUARTER  
HOURS

Name 8 5/2 WAYNE PRICE Date 6/15/95 Miles \_\_\_\_\_ District I  
Time of Departure 7 AM Time of Return 4 PM Car No. G 0472 1

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature [Signature]

TEXAS - NEW MEXICO PIPELINE LEAK SITE  
3 MI NW of MONUMENT NM (STATE LAND)  
TMAP # 10 - 95 NW/4 SE/4 18-19-37  
HOLE ≈ 95-48 FEET DEEP  
TOOK PICTURES - ≈ 11:00 AM - 11:15 AM  
BOTTOM of HOLE HAS STANDING OIL  
TONY SANDIE HAS NOTIFIED NMDC (SF)  
of POSSIBLE GROUND WATER CONTAMINATION

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED	INSPECTION CLASSIFICATION	NATURE OF SPECIFIC WELL OR FACILITY INSPECTED
H = Housekeeping	U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)	D = Drilling
P = Plugging	R = Inspections relating to Reclamation Fund Activity	P = Production
C = Plugging Cleanup	O = Other - Inspections not related to injection or The Reclamation Fund	I = Injection
T = Well Test	E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)	C = Combined prod. inj. operations
R = Repair/Workover		S = SWD
F = Waterflow		U = Underground Storage
M = Mishap or Spill		G = General Operation
W = Water Contamination		F = Facility or location
O = Other		H = Meeting
		O = Other