

1R - 146

APPROVALS

YEAR(S):



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

November 30, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-180

Mr. Paul Reed
Environmental Project Coordinator
Exxon Chemical
P.O. Box 4004
Baytown, Texas 77522-4004

**RE: FINAL CLOSURE
FORMER WEST MARLAND SERVICE FACILITY
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) has completed a review of Exxon Chemical Americas' September 27, 1994 "MONITOR WELL PLUGGING AND ABANDONMENT-FORMER EXXON FACILITY, 2607/2609 WEST MARLAND BOULEVARD, HOBBS, NEW MEXICO". This document contains Exxon's actual monitor well plugging and abandonment procedures used at the former West Marland facility and a request for final closure of the remedial actions.

Exxon's request for final closure is approved. The OCD considers the investigation, remediation and monitor well abandonment activities to be completed in accordance with the regulations in effect at the time of closure.

Please be advised that OCD approval does not relieve Exxon of liability should remaining contaminants pose a future threat to ground water, surface water, public health or the environment. In addition, OCD approval does not relieve Exxon of responsibility for compliance with other federal, state or local laws and regulations.

The OCD thanks Exxon for their initiative and diligence in remediating this site. If you have any questions, please feel free to contact me at (505) 827-7154.

Sincerely,

A handwritten signature in cursive script that reads "William C. Olson".

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office
Jay Swindle, ENSR

P 667 242 180



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BRUCE KING
GOVERNOR

August 1, 1994

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(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-150

Mr. J. Paul Reed
Environmental Project Coordinator
Exxon Chemical
P.O. Box 4004
Baytown, Texas 77522-4004

**RE: MONITOR WELL ABANDONMENT
FORMER WEST MARLAND SERVICE FACILITY
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) has completed a review of Exxon Chemical Americas' July 18, 1994 "MONITOR WELL ABANDONMENT AT FORMER EXXON FACILITY, 2607/2609 WEST MARLAND BOULEVARD, HOBBS, NEW MEXICO". This document presents Exxon's work plan for plugging and abandoning the ground water monitoring well at Exxon's former West Marland service facility located in Hobbs, New Mexico.

The monitor well plugging and abandonment work plan, as presented in the above referenced document, **is approved with the following condition:**

1. A completion report detailing the actual plugging and abandonment procedures will be submitted to the OCD by October 1, 1994.

Please be advised that OCD approval does not relieve Exxon of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office
Jay Swindle, ENSR

P 011 334 150



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June 16, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-132

Mr. J. Paul Reed
Environmental Project Coordinator
Baytown Chemical Plant
Exxon Chemical
P.O. Box 4004
Baytown, Texas 77522-4004

**RE: GROUND WATER INVESTIGATION
FORMER WEST MARLAND SERVICE FACILITY
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) has completed a review of Exxon Chemical Americas' May 1994 "INITIAL GROUNDWATER ASSESSMENT REPORT, FORMER EXXON CHEMICAL FACILITY 2607/2609 WEST MARLAND BOULEVARD, HOBBS, NEW MEXICO" which was received by the OCD on May 25, 1994. This report presents the results of Exxon's ground water investigation at Exxon's former West Marland service facility located in Hobbs, New Mexico.

The ground water investigation, as presented in the above referenced report, **is approved** and the OCD considers the investigation and remediation activities to be completed in accordance with the regulations in effect at this time.

Because this site is not currently being operated by Exxon, the OCD cannot formally issue final closure of the site remedial actions until the sites monitor well is properly plugged and abandoned. Therefore, the OCD requires that Exxon submit a plan to the OCD Santa Fe Office by July 22, 1994 to properly plug and abandon the monitor well at the site.

Please be advised that OCD approval does not relieve Exxon of liability should any remaining contaminants pose a future threat to

Mr. J. Paul Reed
June 16, 1994
Page 2

ground water, surface water, public health or the environment. In addition, OCD approval does not relieve Exxon of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office
Jay Swindle, ENSR

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STATE OF NEW MEXICO

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BRUCE KING
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January 31, 1994

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ANITA LOCKWOOD
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CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-901

Mr. J. Paul Reed
Environmental Project Coordinator
Baytown Chemical Plant
Exxon Chemical
P.O. Box 4004
Baytown, Texas 77522

**RE: MONITOR WELL WORK PLANS
FORMER EXXON DAL PASO AND WEST MARLAND SERVICE FACILITIES
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) has completed a review of Exxon's January 1994 "MONITOR WELL INSTALLATION AND SAMPLING DRAFT WORK PLAN, FORMER EXXON CHEMICAL FACILITY 2607/2609 WEST MARLAND BOULEVARD, HOBBS, NEW MEXICO" and January 1994 "MONITOR WELL INSTALLATION AND SAMPLING DRAFT WORK PLAN, FORMER EXXON CHEMICAL FACILITY 1715 DAL PASO STREET, HOBBS, NEW MEXICO". These reports contain Exxon's proposal for the installation of monitor wells at Exxon's West Marland and Dal Paso service facilities to determine any potential ground water impacts resulting from Exxon's activities.

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

1. The monitor wells will be constructed with at least ten feet of well screen below the water table and five feet above the water table.
2. Ground water samples taken for metals analysis will be analyzed using the appropriate EPA methods for all metals as contained in New Mexico Water Quality Control Commission (WQCC) ground water standards.

Note: New Mexico does not have a ground water standard for total petroleum hydrocarbons (TPH). Therefore, the OCD does not require that ground water samples from the monitor wells be analyzed for TPH.

Mr. J. Paul Reed
January 31, 1994
Page 2

3. The ground water monitoring wells will be installed by April 1, 1994.
4. The technical report containing information on the installation of the monitor wells and the analytic results of the ground water quality sampling will be submitted to the OCD by June 1, 1994.
5. Exxon will notify OCD at least one week in advance of all scheduled activities such that the OCD may have the opportunity to witness the events and/or split samples.

Please be advised that OCD approval does not relieve Exxon of liability should the investigation fail to fully define the extent of contamination related to Exxon's activities. In addition, OCD approval does not relieve Exxon of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Wayne Price, OCD Hobbs District Office
Jay Swindle, ENSR



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

November 18, 1993

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CABINET SECRETARY

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Mr. J.P. Reed
Env. Tech. Services Section-CN-461
Baytown Chemical Plant
Exxon Chemical
P.O. Box 4004
Baytown, Texas 77522

**RE: PHASE III REMOVAL ACTION REPORT
EXXON DAL PASO AND WEST MARLAND SERVICE FACILITIES
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) has completed a review of Exxon's November 1993 "PHASE III REMOVAL ACTION REPORT EXXON CHEMICAL COMPANY FACILITY, 1715 DAL PASO STREET, HOBBS, NEW MEXICO", and Exxon's November 1993 "PHASE III REMOVAL ACTION REPORT FORMER EXXON CHEMICAL COMPANY FACILITY, 2607/2609 WEST MARLAND BOULEVARD, HOBBS, NEW MEXICO". These reports document the results of soil remediation activities at Exxon's West Marland and Dal Paso service facilities.

With the exception of the "Septic Tank - 2 Excavation" floor at the Dal Paso Facility and the "Oil Pit Floor" at the West Marland Facility, the contaminated soils at the West Marland and Dal Paso facilities have been remediated to the standards in effect at the time of closure.

However, the contaminants remaining in the floors of the "Septic Tank - 2 Excavation" floor at the Dal Paso Facility and the "Oil Pit" at the West Marland Facility exceed the OCD's recommended remediation levels. Therefore, the OCD requests that Exxon submit a work plan for the installation of a monitor well directly adjacent to each of these areas to determine any potential impacts on underlying ground water.

Mr. J.P. Reed
November 18, 1993
Page 2

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

A handwritten signature in cursive script that reads "William C. Olson". The signature is written in dark ink and is positioned above the typed name.

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Jay Swindle, ENSR



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



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POST OFFICE BOX 2088
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March 29, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-329

Mr. J.P. Reed
Env. Tech. Services Section-CN-461
Baytown Chemical Plant
Exxon Chemical
Baytown, Texas 77522

**RE: REMOVAL ACTION WORKPLAN
EXXON DAL PASO AND WEST MARLAND SERVICE FACILITIES
HOBBS, NEW MEXICO**

Dear Mr. Reed:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing Exxon's February 1993 "REMOVAL ACTION WORKPLAN FOR FACILITY OWNED BY EXXON CHEMICAL COMPANY IN HOBBS, NEW MEXICO (1715 DAL PASO STREET) and Exxon's February 1993 "REMOVAL ACTION WORKPLAN FOR FACILITY FORMERLY LEASED BY EXXON CHEMICAL COMPANY IN HOBBS, NEW MEXICO (2607/2609 WEST MARLAND BOULEVARD). These documents were submitted to OCD on Exxon's behalf by Exxon's consultant ENSR Consulting and Engineering.

The OCD needs to receive the following information in order to complete a review of the proposed removal actions:

1. The hazardous waste characteristics for contaminated soils from both facilities, with the exception of soils around the septic tank at the Dal Paso facility, were composites of different source areas. The OCD requires that composite samples for determining hazardous waste characteristics be taken of representative contaminated soils from each individual source area. Please sample representative contaminated soils from each source area, analyze the soils for hazardous waste characteristics and provide the results to OCD.

Mr. J.P. Reed
March 29, 1993
Page 2

2. The total lead concentrations in some of the contaminated soils samples were relatively high. However, the TCLP lead analyses for these areas show concentrations at the detection limit for the analysis. Please explain these discrepancies in the analytic results.

Receipt of this information will allow OCD to complete a review of these workplans. If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Jay Swindle, ENSR

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