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REPORTS

DATE:

2/23/1997



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

CONFIDENTIAL

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

February 23, 1997

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

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

RE: Crouch Station Remediation Proposal.

Dear Ms. Kuchenbecker,

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

The proposal is hereby approved with the following conditions:

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

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

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

Final Report

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

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

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

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

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

Sincerely yours,



Wayne Price-Environmental Engineer

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



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT **CONFIDENTIAL**

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

March 4, 1997

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

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

RE: Crouch Station Remediation Proposal.

Dear Ms. Kuchenbecker,

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

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

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

Sincerely yours,

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

Wayne Price-Environmental Engineer

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