

1R - 280

# APPROVALS

YEAR(S):

2001 → 1996



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

November 26, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357-8048**

Mr. R.W. Massey  
Chevron USA Production Company  
P.O. Box 1949  
Eunice, New Mexico 88231

**RE: CASE #1R280**  
**MONUMENT LEAK SITE**  
**MONUMENT, NEW MEXICO**

Dear Mr. Massey:

The New Mexico Oil Conservation Division (OCD) has reviewed the following Chevron USA Production Company's (Chevron) documents submitted on behalf of Chevron by their consultant Safety & Environmental Solutions, Inc.:

- June 22, 2001 "CHEVRON USA, DYNEGY – MONUMENT SITE, MONITOR WELL REPORT, LEA COUNTY, NEW MEXICO" which was received by the OCD on October 22, 2001.
- March 30, 2001 correspondence.
- March 9, 2001 CHEVRON USA, DYNEGY – MONUMENT SITE, MONITOR WELL REPORT, LEA COUNTY, NEW MEXICO" which was received by the OCD on March 9, 2001.

These documents contain the results of Chevron's remediation and monitoring of contaminated ground water related to a Warren Petroleum Company (WPC) pipeline spill and a former Chevron unlined pit located in the N/2 of Section 14, T20S, R36E, Lea County, New Mexico. The documents also contain a plan to modify the site ground water monitoring and reporting program.

The above-referenced monitoring and reporting plan is approved on the following condition:

1. The annual report shall be submitted to the OCD Santa Fe Office by April 1 of each year by September 26, 2001 with a copy provided to the OCD Hobbs District Office. The report shall contain:

Mr. R.W. Massey  
November 26, 2001  
Page 2

- a. A description of the remediation and monitoring activities which occurred during the prior calendar year and any other relevant information.
- b. A ground water potentiometric map for each sampling event showing the magnitude and direction of the hydraulic gradient at the site as wells as the location of the pipelines, spills, monitor wells, recovery wells and any other pertinent site features.
- c. Summary tables of all water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
- d. Summary tables of the free product thickness in each monitor well.
- e. Summary tables showing the amount of free product recovered each year and the total amount recovered to date.

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

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor  
Jim Cooper



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 16, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-709**

Mr. Don Sellars  
Chevron U.S.A. Production Company  
P.O. Box 1635  
Houston, Texas 77251

**RE: MONUMENT PIPELINE SPILL/PIT MONITORING REPORT  
LEA COUNTY, NEW MEXICO**

Dear Mr. Sellars:

The New Mexico Oil Conservation Division (OCD) has reviewed Chevron U.S.A. Production Company's (Chevron) June ~~30~~<sup>8<sup>th</sup></sup> 1999 "CHEVRON USA, DYNEGY - MONUMENT SITE MONITOR WELL REPORT, LEA COUNTY, NEW MEXICO" which was received by the OCD on July 26, 1999. This document contains the results of Chevron's monitoring of contaminated ground water related to a Warren Petroleum Company (WPC) pipeline spill and a former Chevron unlined pit located in the N/2 of Section 14, T20S, R36E NMPM, Lea County, New Mexico.

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

1. According to WPC and Chevron's January 30, 1998 "REMEDATION AND GROUND WATER MONITORING PLAN, MONUMENT, NEW MEXICO" contaminated soils at the site were to be remediated. There is no discussion of these remedial actions in the report.
2. The report does not contain quarterly water table elevation maps showing all monitor well locations, relevant site features, former spill and pit locations and the direction and magnitude of the hydraulic gradient as required in the OCD's April 29, 1998 conditional approval of the remediation and monitoring plan.
3. According to WPC and Chevron's January 30, 1998 "REMEDATION AND GROUND WATER MONITORING PLAN, MONUMENT, NEW MEXICO" a system to recover free phase hydrocarbons from the ground water was to have been installed and operated. There is no discussion of these remedial actions in the report nor of the quarterly volume of product recovered at the site.

Mr. Don Sellars  
September 16, 1999  
Page 2

4. According to WPC and Chevron's January 30, 1998 "REMEDATION AND GROUND WATER MONITORING PLAN, MONUMENT, NEW MEXICO" ground water quality at the site was to be monitored on a quarterly basis. However, the report only contains sampling results from one sampling event on April 8, 1999. This deficiency needs to be addressed.
5. It is not clear whether the ground water metals samples represent total concentrations in ground water or dissolved concentrations in ground water. This needs to be clarified.

Please submit the above information to the OCD by October 22, 1999 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor  
Bob Allen, Safety & Environmental Solutions, Inc.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 29, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-263**

Mr. J.D. Morris  
NGC/Warren Petroleum Company  
1000 Louisiana, Suite 5800  
Houston, Texas 77002-5050

**RE: REMEDIATION PLAN  
MONUMENT PIPELINE SPILL**

Dear Mr. Morris:

The New Mexico Oil Conservation Division (OCD) has reviewed NGC/Warren Petroleum Company's (NGC) and Chevron Production Company's (CHEVRON) January 30, 1998 "REMEDICATION AND GROUND WATER MONITORING PLAN, MONUMENT, NEW MEXICO". This document contains NGC's and CHEVRON's joint work plan for remediation of contaminated ground water related to a NGC/WARREN pipeline spill and a former Chevron unlined pit located in the N/2 of Section 14, T20S, R36E NMPM, Lea County, New Mexico.

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

1. In addition to soil sampling of the blended soils, soil samples will also be taken from the base and sides of the excavated areas in the vicinity of SS-5 and SS-6 such that the potential risks of remaining contaminants can be determined. The samples will be analyzed for benzene, toluene, ethylbenzene, xylene, total petroleum hydrocarbons and any other soil parameters necessary to support a risk assessment.
2. The OCD can not consider the ground water remediation and monitoring actions to be complete until the ground water contaminants related to NGC and CHEVRON's activities are less than New Mexico Water Quality Control Commission standards.
3. The annual remediation and monitoring report will be submitted to the OCD Santa Fe Office by April 1 of each year with a copy provided to the OCD Hobbs District Office. The Report will contain:
  - a. A description of all activities conducted including conclusions and recommendations.
  - b. A quarterly water table elevation map showing all monitor well locations and relevant site features, former spill and pit locations and the direction and magnitude of the hydraulic gradient.

Mr. J.D. Morris  
 April 29, 1998  
 Page 2

- c. A tabular summary of all past and present water quality analyses, including the laboratory analytical results of all soil and water quality sampling and all quality assurance/quality control data conducted during the year.
  - d. The disposition of all wastes generated.
2. NGC and CHEVRON will notify the OCD at least 1 week in advance of the scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Pleased be advised that OCD approval does not relieve NGC and CHEVRON of liability if the work plan fails to adequately remediate or monitor contamination related to their activities. In addition, OCD approval does not relieve NGC and CHEVRON of responsibility for compliance with any other federal, state, local or tribal laws and regulations.

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

Sincerely,



William C. Olson  
 Hydrogeologist  
 Environmental Bureau

xc: Wayne Price, OCD Hobbs Office  
 Don Sellars, Chevron Production USA, Inc.

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PS Form 3800, April 1995



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

January 21, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-269-269-238**

Mr. J.D. Morris  
Health Environment & Loss Prevention  
Warren Petroleum Company  
P.O. Box 1589  
Tulsa, Oklahoma 74102

**RE: PIPELINE SPILL/UNLINED PIT  
MONUMENT, NEW MEXICO**

Dear Mr. Morris:

The New Mexico Oil Conservation Division (OCD) Environmental Bureau is in receipt of Warren Petroleum Company's (WPC) July 9, 1996 "PIPELINE SPILL CLEANUP REPORT, MONUMENT GAS PLANT, N/2, SEC 14, T20S, R36E,, NEW MEXICO" which was referred to this office from the OCD's Hobbs District Office on October 8, 1996. This document contains a report on WPC's remedial activities related to a leak of condensate from a WPC pipeline at the above referenced location.

This document shows that soil contamination in excess of OCD's recommended action levels remains at the base of the excavated area. WPC maintains that the remaining contamination is a result of an adjacent former unlined pit that was operated by Chevron. However, while some of the contamination appears to be from the former pit, a high amount of light end petroleum products remain in the excavated area indicative of a recent source such as WPC's pipeline condensate leak.

Upon review of this document it is the OCD's opinion that both WPC's pipeline leak and Chevron's former unlined pit have contributed to the contamination at the site. Therefore, the OCD requires that both WPC and Chevron, by March 31, 1996, jointly investigate the extent of and remediate, if necessary, the remaining contamination at the site in accordance with the OCD's "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES".

Mr. J.D. Morris  
January 21, 1997  
Page 2

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
Don Griffin, Chevron

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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION  
HOBBS DISTRICT OFFICE

NMOCD INTER-OFFICE CORRESPONDENCE

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

TO: Roger Anderson-Environmental Bureau Chief  
From: Wayne Price-Environmental Engineer  
Date: October 8, 1996  
Reference: Warren Petroleum Co. (WPC)  
Subject: Pipeline Spill Cleanup Report  
Monument Gas Plant  
N/2, Sec 14, Ts20s, R36E  
Lea County, New Mexico

RECEIVED

OCT 15 1996

Environmental Bureau  
Oil Conservation Division

Comments:

Dear Roger,

Jerry Sexton has requested your department review the enclosed closure report referenced above and provide guidance to the NMOCD district on this issue. As you know our NMOCD District policy does not require companies to "trace as to depth" contamination from exempt spills.

Attached is a copy of the NMOCD Hobbs file correspondence for this case. Also enclosed is a copy of a letter of concern from Mr. Jim Cooper owner of the land where the leak occurred.

I have reviewed the closure report submitted by WPC and as a result of this report and my resultant investigation which included a number of trips to the site, photos, and field sampling events, there is substantial evidence indicating that remaining leachable contaminants exceed our guideline standards for closure.

Ground water in this area is extremely shallow, 35 feet as reported by WPC, which indicates there is a reasonable probability that ground water might have been impacted.

The report shows that sample #10-Pilot Hole 20' deep has high TPH values (32,100 ppm) but very low BTEX values (.392 ppm). This was an exploratory hole supposedly in the middle of the old historical contamination which lies just west of the spill site. Using these values one could conclude that the remaining volatile contaminants as shown on the WPC test results which exceed NMOCD guideline standards were generated from the more recent pipeline leak including the contamination found in some of the visual dark "historical soil".

My field test indicated that the darker soils that WPC is calling historical contamination which is under and near where the leak occurred revealed that volatile organics are still present. One such sample on the west side wall which had been exposed to the atmosphere, open for some time, revealed a value of 227 ppm of volatile organics.

On April 3, 1996 WPC representative Don Wallace requested my presence to witness a bottom hole sample taken at 32 feet deep under the pipeline. As of this date I have not received a copy of those results and they were not included in the closure report. My field PID results on that day indicated that volatile organics were present at a value near 100 ppm within a few feet of the ground water. This sample was taken by Mr. Wallace and I from the sidewall near the bottom, after the hole had been left open for some time.

The closure report test results indicates under the center of the leak, sample #2, called "Under Center" revealed a TPH value of 33,400 ppm but no details are given as to depth. These results were taken approximately 21 days after my sampling event. This value exceeds the NMOCD guideline standards which is 100 ppm.

Also the test results indicate there still are volatile organics remaining from the released pipeline fluids in this area as did my field test.

The final results supplied in the closure plan ranged from less than detection limits to 148 ppm for total BTEX. Three sample points #5, 6, and 7 exceed our guideline standards of 50 ppm for BTEX. TPH values ranged from 12 ppm to 65,000 ppm with an average of 24,246 ppm.

On May 6, 1996 Don Wallace came in the office and gave us a progress report. At that time Mr. Wallace indicated to me that WPC for economic and safety reasons is in the process of back-filling the excavated hole and will put in a monitor well or perform a soil boring to determine if ground water has been impacted. He also indicated they are considering closing the site using a risk-based method. The submitted closure report does not mention this commitment or demonstrate any risk-based method.

**Therefore It is my recommendation that Warren Petroleum Co. continue their investigation to determine the vertical migration of the contaminants below the pipeline leak and make a determination if ground water has been impacted.**

After you or your staff have had an opportunity to review would you please make recommendations to the NMOCD district office on the submitted closure.

Thank you for your time and we await your recommendations.

If you require any further information concerning this closure 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

attachments- copy of Hobbs file.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 17, 1997

**CERTIFIED MAIL**

Mr. J.D. Morris -  
NGC/Warren Petroleum Company  
1000 Louisiana, Suite 5800  
Houston, Texas 77002-5050

**RETURN RECEIPT NO. Z-235-437-207**

Mr. Don Sellars -  
Chevron U.S.A. Production Co.  
P.O. Box 1635  
Houston, Texas 77251

**RETURN RECEIPT NO. Z-235-437-208**

**RE: MONUMENT PIPELINE SPILL**

Dear Sirs:

The New Mexico Oil Conservation Division (OCD) has reviewed NGC/Warren Petroleum Company's (NGC/WARREN) October 9, 1997 "GROUND WATER INVESTIGATION WORK PLAN, PIPELINE SPILL/UNLINED PIT, MONUMENT, NEW MEXICO". This document contains the results of NGC/WARREN's and Chevron U.S.A. Company's (Chevron) joint investigation of the extent of contamination related to a NGC/WARREN pipeline spill and a former Chevron unlined pit located in the N/2 of Section 14, T20S, R36E NMPM, Lea County, New Mexico.

Upon a review of the above referenced document, the OCD requires that NGC/WARREN and Chevron submit a comprehensive soil and ground water remediation plan to the OCD. Please submit the work plan to the OCD Santa Fe Office by February 2, 1998 with a copy provided to the OCD Hobbs District Office. The OCD also requests that NGC/WARREN and Chevron clarify whether the ground water metals analyses represent dissolved or total metals concentrations in the ground water.

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

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Wayne Price, OCD Hobbs Office  
Mark J. Larson, Highlander Environmental Corp.

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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

June 6, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-410-431-179**

Mr. Don Griffin  
Chevron USA Production Co.  
P.O. Box 1949  
Eunice, New Mexico 88231

**RE: GROUND WATER INVESTIGATION WORK PLAN  
PIPELINE SPILL/UNLINED PIT  
MONUMENT, NEW MEXICO**

Dear Mr. Griffin:

The New Mexico Oil Conservation Division (OCD) has reviewed Chevron U.S.A. Production Company's (Chevron) April 24, 1997 "PIPELINE SPILL/HISTORIC PIT, MONUMENT, LEA COUNTY, NEW MEXICO". This document contains Chevron's work plan for investigation of the extent of ground water contamination related to a former unlined pit near Monument, New Mexico.

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

1. Chevron will define the full extent of free phase and dissolved phase hydrocarbon contaminants in ground water which are related to their activities.
2. All monitor wells will be constructed and completed as set out below:
  - a. A minimum of fifteen feet of well screen will be installed, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
  - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.

Mr. Donald R. Griffin  
June 6, 1997  
Page 2

- c. A 2-3 foot bentonite plug will be placed above the gravel pack.
  - d. The remainder of the hole will be grouted to the surface with cement containing 3-5 % bentonite.
  - e. Each well will be developed after construction using EPA approved procedures.
3. Ground water from all the monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), major cations and anions, New Mexico Water Quality Control Commission (WQCC) metals and polynuclear aromatic hydrocarbons using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. All wastes generated during the investigative and remedial actions will be disposed of at an OCD approved facility.
5. A report on the investigation activities will be submitted to the OCD by August 15, 1997. The report will include:
  - a. A description of all activities which occurred during the investigation, including conclusions and recommendations.
  - b. A map showing all pertinent site features and sampling and monitor well locations.
  - c. A water table elevation map using the water table elevation of the ground water in all site monitor wells.
  - d. A product thickness map using the thickness of free phase product on the ground water in all monitor wells.
  - e. A geologic log and as built well completion diagram for each monitor well.
  - f. A summary of the water quality sampling results as well as the copies of all laboratory analyses and associated QA/QC data.
6. Chevron will notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
7. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Mr. Donald R. Griffin  
June 6, 1997  
Page 3

Please be advised that OCD approval does not relieve Chevron of liability should contamination exist which is outside the scope of work plan, or if the proposed work plan fails to determine the full extent of contamination related to Chevron's activities. In addition, OCD approval does not relieve Chevron of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
Sharon Hall, Philip Environmental

PS Form 3800, April 1995

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NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

January 21, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-269-269-239**

Mr. Don Griffin  
Chevron USA Production Co.  
P.O. Box 670  
Hobbs, New Mexico 88240

**RE: PIPELINE SPILL/UNLINED PIT  
MONUMENT, NEW MEXICO**

Dear Mr. Griffin:

The New Mexico Oil Conservation Division (OCD) Environmental Bureau is in receipt of a Warren Petroleum Company (WPC) July 9, 1996 "PIPELINE SPILL CLEANUP REPORT, MONUMENT GAS PLANT, N/2, SEC 14, T20S, R36E,, NEW MEXICO" which was referred to this office from the OCD's Hobbs District Office on October 8, 1996. This document contains a report on WPC's remedial activities related to a leak of condensate from a WPC pipeline at the above referenced location.

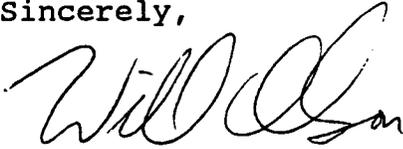
This document shows that soil contamination in excess of OCD's recommended action levels remains at the base of the excavated area. WPC maintains that the remaining contamination is a result of an adjacent former unlined pit that was operated by Chevron. However, while some of the contamination appears to be from the former pit, a high amount of light end petroleum products remain in the excavated area indicative of a recent source such as WPC's pipeline condensate leak.

Upon review of this document it is the OCD's opinion that both WPC's pipeline leak and Chevron's former unlined pit have contributed to the contamination at the site. Therefore, the OCD requires that both WPC and Chevron, by March 31, 1996, jointly investigate the extent of and remediate, if necessary, the remaining contamination at the site in accordance with the OCD's "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES".

Mr. Donald R. Griffin  
January 21, 1997  
Page 2

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor  
Wayne Price, OCD Hobbs Office  
J.D. Morris, Warren Petroleum Company

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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
HOBBS DISTRICT OFFICE

NMOCD INTER-OFFICE CORRESPONDENCE

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

TO: Chevron USA Production Co.  
From: Wayne Price-Environmental Engineer *Wayne Price*  
Date: November 14, 1996  
Reference: Monument Leases Remediation Project.  
Subject: Progress report & Inquiry by Don Griffin-Chevron E&S.

**Comments:**

Don indicated they will be hiring third party to perform initial site assessment for four locations in the Monument area.

Discussed different site investigation methods, remedial techniques and closure procedures.

**Agreements:**

Chevron will submit site investigation and remedial work plans for NMOCD approval and notify NMOCD of any significant on-site activities.

**Recommendations:**

Chevron Pit located more or less in N/2 of sec 14-Ts20s-R36e near the Warren's 10" Nat. Gas line.

Previous investigations by NMOCD indicate ground water to be quite shallow in this area 35-50 feet and documentation that the pit contamination is known to exist at least 20 feet deep with TPH values at 32,100 ppm which exceeds the NMOCD guidelines standards of 100 ppm.

Therefore Chevron should determine if ground water has been impacted below the pit area. It is recommended that a combination investigation soil boring and monitor well be installed to determine if any impact to ground water has occurred.

cc: Jerry Sexton-NMOCD District I Supervisor  
Roger Anderson-Environmental Bureau Chief  
Don Griffin-Chevron USA Production Co.  
P.O. 1949  
Eunice, NM 88230  
394-1237



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 17, 1997

**CERTIFIED MAIL**

Mr. J.D. Morris -  
NGC/Warren Petroleum Company  
1000 Louisiana, Suite 5800  
Houston, Texas 77002-5050

**RETURN RECEIPT NO. Z-235-437-207**

Mr. Don Sellars -  
Chevron U.S.A. Production Co.  
P.O. Box 1635  
Houston, Texas 77251

**RETURN RECEIPT NO. Z-235-437-208**

**RE: MONUMENT PIPELINE SPILL**

Dear Sirs:

The New Mexico Oil Conservation Division (OCD) has reviewed NGC/Warren Petroleum Company's (NGC/WARREN) October 9, 1997 "GROUND WATER INVESTIGATION WORK PLAN, PIPELINE SPILL/UNLINED PIT, MONUMENT, NEW MEXICO". This document contains the results of NGC/WARREN's and Chevron U.S.A. Company's (Chevron) joint investigation of the extent of contamination related to a NGC/WARREN pipeline spill and a former Chevron unlined pit located in the N/2 of Section 14, T20S, R36E NMPM, Lea County, New Mexico.

Upon a review of the above referenced document, the OCD requires that NGC/WARREN and Chevron submit a comprehensive soil and ground water remediation plan to the OCD. Please submit the work plan to the OCD Santa Fe Office by February 2, 1998 with a copy provided to the OCD Hobbs District Office. The OCD also requests that NGC/WARREN and Chevron clarify whether the ground water metals analyses represent dissolved or total metals concentrations in the ground water.

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

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Wayne Price, OCD Hobbs Office  
Mark J. Larson, Highlander Environmental Corp.

Z 235 437 207

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to

Street & Number

Post Office, State, & ZIP Code

Postage

\$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered

Return Receipt Showing to Whom, Date, & Addressee's Address

TOTAL Postage & Fees

\$

Postmark or Date

*From reported impact & recommendations*

July 23, 1996

OFFICE  
CUB HUBBS  
AUG 05 1996

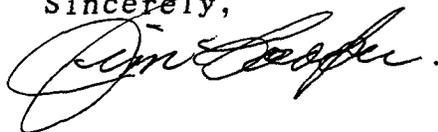
Mr. Jerry Sexton  
NMOCD  
P.O. Box 1980  
Hobbs, NM 88240

Mr. Sexton:

I am concerned about the Warren Petroleum pipeline leak in Sect. 14, which has been repaired and some attempt was made to clean up area. I understand Warren wants to close this site and stop further cleanup. Since this leak had been leaking for several months prior to anything being done, I am concerned that my shallow groundwater in this area may be affected. Is there any way the water can be tested before they close this problem area?

If you can be of assistance in this matter it would be appreciated.

Sincerely,



Jim Cooper

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

W

Telephone  Personal

Time  
10:00 AM

Date  
MAY 6 1966

Originating Party

Other Parties

DON WALLIS - WARREN

Subject PIPELINE LEASE 19-20-36

Discussion PROGRESS REPORT

Conclusions or Agreements

Distribution

Signed

**NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT**

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Name WAYNE PRICE Date \_\_\_\_\_ Miles \_\_\_\_\_ District I  
 Time of Departure 7 AM Time of Return 4 PM Car No. G 0472

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature \_\_\_\_\_

2 ARREX GAS LINE LEAK 1/2 mi 14-T205-R36E

4-4-96 12-1pm TOOK PICTURES U/Bell Mineral

4-15-96 ~ 12:30pm - 1:30pm TOOK PICTURES

MANHOLE REPAIR, EXCAVATED HOLE 13E1.

<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. (SND, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
  - R = Inspections relating to Reclamation Fund Activity
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- E** - Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

- D = Drilling
- P = Production
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- S = SND
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- G = General Operation
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- M = Meeting
- O = Other

NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

~ 11:45 AM

Name WAYNE PRICE Date APR 3 1976 Miles \_\_\_\_\_ District I  
Time of Departure 7 AM Time of Return 4 PM Car No. G 0472

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]

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER	HOURS
------------	----------------	----------	-------	---------	-------

WARREN GAS LINE LEAK - ~ 3 mi S WARREN PLANT  
WITNESS BOTTOM HOLE SAMPLE TAKEN BY  
DON WALLACE - SEE ATTACH FIELD SKETCH, LOG BOOK

SAMPLE TAKEN USING ~ 20' LONG PVB - TAKEN  
FROM CENTER OF EXCAVATED AREA HOLE DUG ~ 10' DEEP - TOTAL DEPTH ~ 32'

RAW PID ON BOTTOM HOLE SAMPLE (BLEX) = 110-120 ppm = 94 ppm  
MILD TO MODERATE HYDROCARBON ODOOR - FINE SAND WITH  
CALICHE - Lt CREAM COLOR VISUAL CONTAMINATION.

RAW PID ON WEST WALL (19' FROM) SURFACE = 244-17 = 227 ppm  
DARK BROWN HYDROCARBON VISUAL CONTAMINATION WITH STRONG  
HYDROCARBON ODOOR.

SAMPLE SURFACE BETWEEN EXCAVATED AREAS ~ 130 ppm PIA (BLEX)

Mileage	Per Diem	Hours
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

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Page 2 of 2  
 W. Price

NEW MEXICO OIL CONSERVATION COMMISSION  
 FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER	HOURS
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Name WAYNE PRICE Date APRIL 9 1976 Miles \_\_\_\_\_ District I  
 Time of Departure 7 AM Time of Return 4 PM Car No. G 0472

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Signature W. Price

TOOK CORRODED PIPE INVENTORY - MAKE  
 SURVEY - NOTED & MARKED VISUAL HOLES  
 IN PIPE!

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

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- O = Other

CC: JEFF...

OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, New Mexico 87504

State of New Mexico  
Energy and Minerals Department

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Called don Walker  
3/21/96  
in 35.

Name of Operator WARREN PETROLEUM CO				Address P.O. BOX 67 Monument, NM 88265			
Report of	Fire	Break	Spill	Leak ✓	Blowout	Other*	
Type of Facility	Drlg Well	Prod Well	Tank Btty	Pipe Line ✓	Gasol Plnt	Oil Rfy	Other*
Name of Facility WARREN PETROLEUM CO. Monument Gathering System							
Location of Facility (Quarter/Quarter Section or Footage Description) SW 1/4 of NE 1/4				Sec. 14	Twp. 20	Rge. 36	County LEA
Distance and Direction From Nearest Town or Prominent Landmark South of WARREN Monument Plant 2 1/2 miles							
Date and Hour of Occurrence Unknown				Date and Hour of Discovery 1/24/96 10:00 Am			
Was Immediate Notice Given?		Yes ✓	No	Not Required	If Yes, To Whom WAYNE PRICE		
By Whom Landowner and Jerry Parr				Date and Hour 1/25/96			
Type of Fluid Lost Crude and Produced Water				Quantity of Loss 20 BO 30 BW	Volume Recovered 12 BO 12 BW		
Did Any Fluids Reach a Watercourse?		Yes	No ✓	Quantity			
If Yes, Describe Fully**							
Describe Cause of Problem and Remedial Action Taken** Pipe deteriorated due to HOT SALT, a new section of poly pipe was installed. All free liquids were recovered with a VAC truck. A site assessment will be completed, a work plan is attached.							
Describe Area Affected and Cleanup Action Taken** The saturated soil was excavated and put on plastic and covered with plastic. Approx. 160 cu. yds. has been removed to the GANDY MARLEY landfarm. The site is estimated to have about 1100 cu yds. of dirt yet to be handled.							
Description of Area	Farming	Grazing ✓	Urban	Other*			
Surface Conditions	Sandy	Sandy Loam ✓	Clay	Rocky	Wet	Dry	Snow
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**  DRY 50°F WIND SW 10-15 MPH							
I Hereby Certify That the Information Above Is True and Complete to the Best of My Knowledge and Belief							

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OFFICE

Signed *[Signature]* Title Field Supervisor Date 2/8/96  
\*Specify \*\*Attach Additional Sheets if Necessary

# **Safety & Environmental Solutions, Inc.**

---

February 9, 1996

**Work Plan  
Warren Petroleum Company  
Monument 10" Polyline Gas Gathering System Leak**

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OCC HUBBS  
OFFICE

## **Purpose**

The purpose of this work plan is to present a systematic approach to the excavation, remediation, transportation, disposal, and/or landfarming resulting from the liquid spill located in Lea County, New Mexico.

## **Background**

Produced fluids were released from the pipeline onto private land approximately three miles south of the Monument Warren Plant during the first part of January, 1996.

## **Action Plan**

The heavily contaminated soil has been excavated and placed on the side on plastic. It will be transported to an approved disposal facility. The remaining contaminated soil may be excavated and transported to the Warren Plant facility in Monument, where it will be landfarmed until it reaches acceptable regulatory limits. Alternately, the remaining contaminated soil may be remediated onsite, and blended to below regulatory limits. The excavation will be backfilled and the site restored to original grade. This blending of the residual contaminated soil will:

1. Aid in the aeration of the residual contaminated soil.
2. Reduce the TPH to a level unlikely to move downward and contaminate additional soils.
3. Add indigenous microbes to the residual contaminated soil in order to biodegrade the residual hydrocarbons in a shorter length of time.

The excavation to obtain additional media will be performed with a bulldozer, backhoe, grader or combination thereof, with a minimum of disturbance to the existing location. SES, Inc. will verify that the extent of contamination from the leak location has been determined by performing THP field tests using the Hanby method conducted on soil samples from the area.

Soil samples may be obtained from the bottom and sides of the excavation if onsite remediation is performed. Alternately, samples to define the contaminant plume will be obtained by augering the site. Once acceptable levels are achieved, the soil will be folded back into the excavation, blending it to assure replacement is below regulatory levels. TPH field tests will be conducted on the blended soil. These tests results will verify that the soil is minimally contaminated (below regulatory limits), and the appropriate documents will be filed requesting closure.

### **Site Safety**

There are a number of health and safety concerns associated with the excavation of trenches at these types of sites. Compliance with the following OSHA standards will be required as necessary at the site:

- Trenching and Shoring - 29 CFR 1926.650 - 653
- Hazwoper/Atmospheric Testing - 29 CFR 1910.120
- Respiratory Protection - 29 CFR 1910.134
- Personal Protective Equipment - 29 CFR 1910.132 - 140

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This general type of plan has been verbally approved by the Bureau of Land Management and the Oil Conservation Division in Lea County.

### **Standard Operating Procedures for Auger Sampling**

Standard operating procedures (SOPs) were obtained from the Environmental Protection Agency, 1984, Characterization of Hazardous Waste Sites - A Methods Manual: Vol II. Available sampling methods. EPA/600/4-84-076.

This system consists of an auger bit, a series of drill rods, and a "T" handle. The auger bit is used to bore a hole to the desired sampling depth. Since this soil is expected to be of various types, the samples will be taken directly from the auger itself at the specified depths.

### Procedure for Use

1. Clear the area to be sampled of any surface debris.
2. Begin drilling, periodically removing accumulated soils. This prevents accidentally brushing loose material back down the borehole when removing the auger or adding drill rods.
3. After reaching desired depth, slowly and carefully remove the auger, and collect sample from the auger.
4. Place sample in sample container. Check that a Teflon liner is present in the cap if required. Secure the cap tightly.
5. Label the sample container with appropriate sample tag. Complete all chain-of-custody forms and record in the field log book.
6. Perform field test or alternatively refrigerate and transport to laboratory.
7. Decontaminate equipment after use and between samples.

### **Standard Operating Procedures for Excavation Sampling**

1. Collect undisturbed sample from the side of the excavation at the desired depth.
2. Follow steps 4-7 in the preceding instructions.

### **Standard Operating Procedures for Spill Cleanup**

Standard Operating Procedures (SOP's) were obtained from the New Mexico Oil Conservation Division "Guidelines for Remediation of Leaks, Spills and Releases" August 13, 1993.

The source of the leak was stopped by clamping, and permanent repairs to the pipeline were effected by replacing the steel 10" line with 10" polyfused line. Containment was performed by utilizing a vacuum truck to recover all free liquids.

The saturated soils present at the leak site were excavated, and placed on plastic beside the spill location. These soils will be disposed of at an approved disposal site for exempted oilfield wastes.

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## **Standard Operating Procedures for Landfarming**

The Standard Operating Procedures for Landfarming (SOP's) were obtained from the New Mexico Oil Conservation Division "Guidelines for Permit Application Design, and Operation of Centralized & Commercial Landfarms" July 1993.

An application for a Surface Waste Disposal Facility will be filed with the State of New Mexico Energy, Minerals and Natural Resources Department - Oil Conservation Division in Santa Fe, New Mexico (with appropriate copy to the Division District Office).

The landfarm (when approved) will operate under the following general guidelines:

- (1) Only non-hazardous RCRA oilfield waste will be treated
- (2) The cell will not be lined because of the caliche cap that exists at the facility and the continuous monitoring of groundwater on the premises.
- (3) A rain run-off prevention berm will be constructed, with a freeboard of a minimum of one foot.
- (4) No free liquids from waste will be allowed in the cell.
- (5) The cell will be maintained at all times to assure it's existence will never be a public nuisance, nor harmful to public health and/or the environment.
- (6) Periodic aeration will be provided by turnover of the landfarm material, insuring optimum conditions for naturally occurring bacterial growth and reduction fo the overall TPH and BTEX levels.
- (7) Naturally occurring rainfall may be supplemented by watering of the site as needed to asure optimal bacterial growth.
- (8) Addition of organics (manure) or nitrogen fertilizer may be indicated to hasten overall reduction of TPH levels. If necessary, minimal amounts will be utilized and the overall aesthetic state of the landfarm will be monitored.
- (9) When TPH and BTEX levels are suspected to be below regulatory limits, samples will be taken and analyzed to assure remediation is complete.

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OFFICE

(10) Warren Petroleum will be responsible for maintaining all necessary and required records pertaining to the cell.

(11) Warren Petroleum will requisition approval from the NMOCD District 1 office for any removal and final disposition of any and all landfarm cell treated waste, noting all final treatment/remediation levels are pursuant to NMOCD guidelines. Final closure will only occur after proper documentation and ultimate disposal of the materials is correctly completed and approved by the appropriate governmental agencies.

### **Risk Assessment**

The depth to ground water at this location is approximately 35 feet. This ground water however, not used as a domestic or private water supply, and is already severely contaminated by years of infiltration from oilfield production.

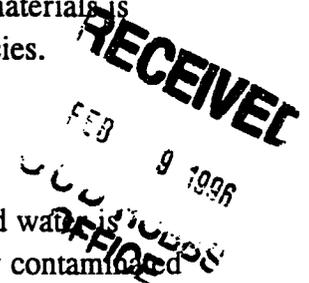
The nearest water well is located 675 yards to the east northeast. Containment was accomplished within 150 feet of the original leak site, and there is no appreciable risk of contamination of the aquifer from ingress through the bore of the nearest water well.

The nearest surface water is located over one mile to the north northeast at a windmill currently used for livestock watering. There is no risk of contaminating this surface water as a result of this leak.

The soil type beneath the leak area is Pyote and Maljamar fine sands. (Soil classification per USDA soil survey - PU) This soil has moderately rapid permeability. Runoff is very slow. Water intake is rapid and the available water holding capacity is 5 to 7 inches. Roots penetrate this soil to a depth of 60 inches or more. Soil blowing is a hazard. From visual survey of the actual excavation the soil is: sandy loam for approximately 2 feet, a 2 foot caliche cap, sand approximately 5 feet, another 2 foot caliche cap, then sandy loam to bottom of the excavation.

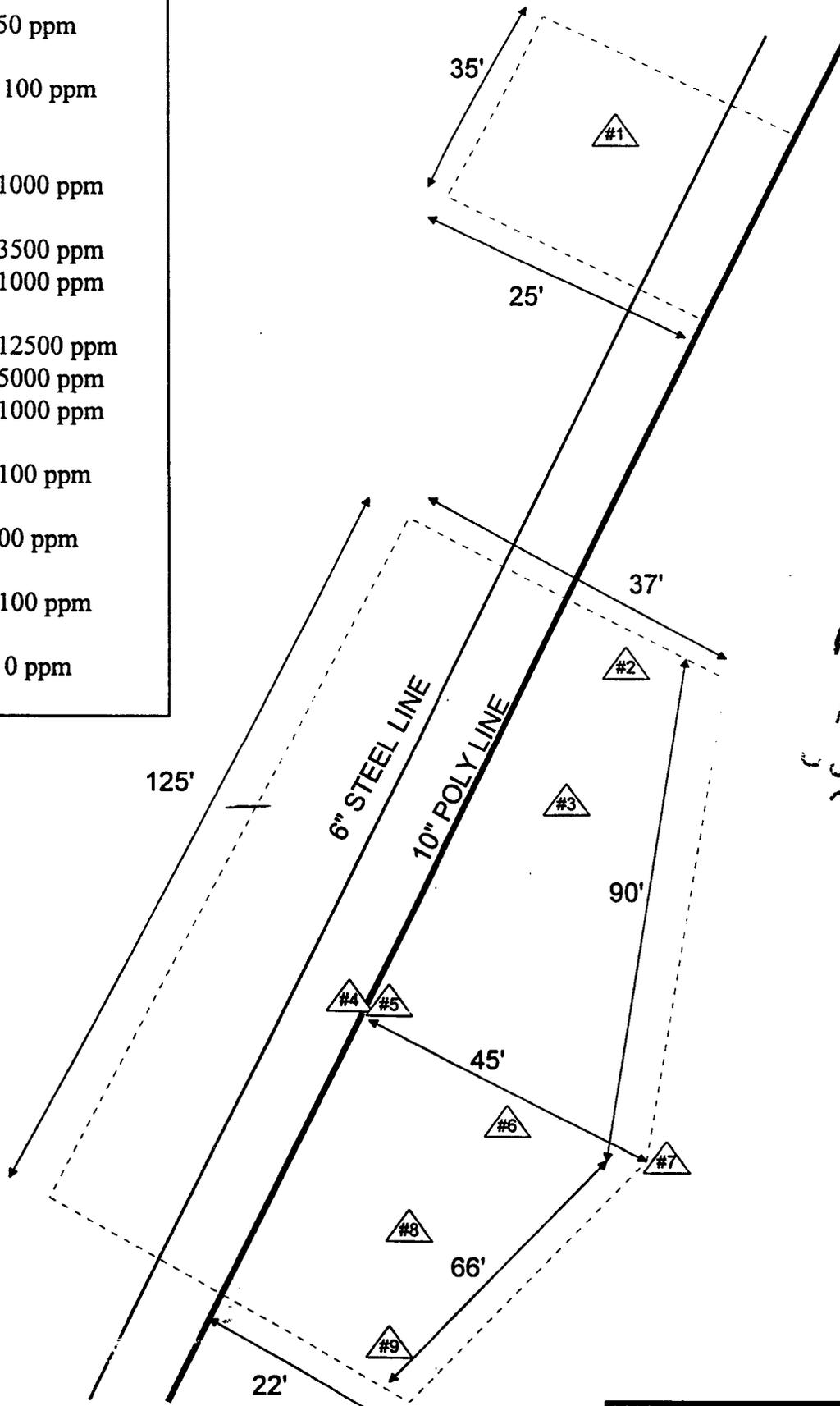
This leak occurred directly adjacent to an old tank battery location (within 25 feet) which was already highly contaminated. The plume of contamination of this release will be affected by this prior contamination, and background TPH and BTEX levels in the area may be extremely high.

In summary, the risk posed to domestic or private groundwater supplies, surface water, and the environment is minimal when following the work plan outlined. The disposal of the saturated soil and the assurance that unsaturated contaminated soils are below regulatory limits should insure that detrimental environmental effects are minimized.



**TPH TEST SITES**

- #1 10' = 50 ppm
- #2 2.5' = 100 ppm
- #3 14' = 1000 ppm
- #4 10' = 3500 ppm  
15' = 1000 ppm
- #5 15' = 12500 ppm  
18' = 5000 ppm  
20' = 1000 ppm
- #6 12' = 100 ppm
- #7 5' = 100 ppm
- #8 10' = 100 ppm
- #9 2.5' = 0 ppm



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Estimated Excavation Volume =  
 1,200 cubic yards

Not to Scale

**WARREN PETROLEUM  
 HOBBS, NEW MEXICO**

Figure A-1  
**MONUMENT 10" POLYLINE LEAK SITE**

Safety & Environmental Solutions, Inc.

NMOCD INTER-OFFICE CORRESPONDENCE

TO: File of Warren Pet. Corp.  
From: Wayne Price-Environmental Engineer   
Date: Feb. 7, 1996  
Reference: Visit by Don Wallace-Warren Environmental dept.  
Subject: Progress report on line leak on Cooper Ranch  
approx. 3 mi. S of Warren Monument Plant.

Comments:

Don indicated they have removed approx. 160 yards of contaminated soils to the Gandy Marley Landfarm. They have excavated another 100-150 yards of contaminated soil which is on plastic & covered.

They have a hole about 8-10 feet wide and approx. 18 feet deep. Bottom hole TPH samples are about 1000 ppm TPH. Ground water in area is est. to be 35-50 ft. They est. they have another 1200 yards of soils that they want to excavate.

The land owner Mr. Jim Cooper has shut them down and will not let them on site.

The initial spill was est. to be < than 5 BBLs of crude & condensate. They have picked up 24 BBL. They will submit a corrected spill report and have plans on submitting a site assessment and remediation work plan for our approval.

They are going to continue to negotiate with the land owner on land use issues.

They also have hired a third party contractor to assist them.

They understand that using the guidelines is voluntary and they can present other options.

I informed them if ground water has been contaminated then they are required to report this to the NMOCD.

cc: Jerry Sexton-District I Supervisor  
Roger Anderson-Environmental Bureau Chief

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NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

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 Time of Departure 7 AM Time of Return 4 PM Car No. G 04721

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]

WARREN PETROLEUM Co. - GAS LINE LEAK

SW 1/4 14-<sup>19</sup>20-36 E 3 mi S of WARREN MONUMENT PLANT.

MET JERRY PARR (WARREN) + J COOPER (LAND OWNER) FOLLOWED TO LEAK SITE.

OLD 10" STEEL LINE LINE RUNS FROM 5100 TO PLANT - WARREN WAS EXCAVATING TO REPAIR LINE. - SOIL CONTAMINATED WITH GAS CONDENSATES, CRUDE OIL + WATER FROM LINE.

GAVE JERRY PARR NMOCD LEAK & SPILL GUIDELINES + LIST OF NMOCD PERMITTED DISPOSAL FACILITIES - MR. PARR INDICATED LEAK WAS < 5 PPL'S LINE CANNOT BE PATCHED UNLESS ACCUMULATED IN LOW SPOT PER J.P.

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

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