

1R - 295

APPROVALS

YEAR(S):

2005 - 2001

Price, Wayne

From: Price, Wayne
Sent: Thursday, April 14, 2005 8:10 AM
To: 'Jennifer Abrahams'; Price, Wayne
Cc: Chien Ngo; Tanya Akkerrman; brouman@hansonle.com; dbrodak@sevenson.net; gpattison@sevenson.net; mgwjr@sevenson.net
Subject: RE: Soil excavation activities at former Axelson site, Hobbs, NM

OCD hereby approves of the plan with the following condition(s).

Notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

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

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

From: Jennifer Abrahams [mailto:jabrahams@geotransinc.com]
Sent: Wednesday, April 13, 2005 4:49 PM
To: wprice@state.nm.us
Cc: Chien Ngo; Tanya Akkerrman; brouman@hansonle.com; dbrodak@sevenson.net; gpattison@sevenson.net; mgwjr@sevenson.net
Subject: Soil excavation activities at former Axelson site, Hobbs, NM

Hello Wayne,

As we discussed earlier this week, this email documents our conversation regarding the planned soil remediation activities at the former Axelson facility, located at 2703 West Marland Blvd., in Hobbs, New Mexico. Discussions with the remediation engineer and the excavation contractor identified the need to excavate a test pit on the site to obtain specific geotechnical properties of the soils to assist with the design of the "full" excavation. The test pit will be located within the footprint of the area of the "full" excavation. Specific points discussed are summarized below:

1. It is acceptable with New Mexico Oil Conservation District (OCD) to replace the soil removed from the test pit excavation. This soil will not require any analyses prior to replacing it in the pit. This soil will be excavated and removed from the site during the "full" site excavation (anticipated to occur in September or October 2005).
2. OCD does not have compaction requirements for the test pit.
3. Some site wells are located in the footprint of the "full" site excavation * these wells can be removed during the "full" excavation without any advance preparation, such as plugging the wells.
4. During the "full" site excavation, it is anticipated that unimpacted soil will be excavated as well as impacted soil. These two types of soil will be segregated in the field, based on visual observation as well as field instrumentation (photoionization detector). OCD stated that some laboratory analyses of the unimpacted soil will be necessary prior to using the unimpacted soil as backfill. At least 4,500 to 5,000 cubic yards of soil are anticipated to be excavated, approximately 1/4 of this volume may be unimpacted. We propose to collect 1 composite of 4 sub-sample locations per 250 cubic yards of soil and analyze the samples for total petroleum hydrocarbons. If the results are below the recommended OCD action level of 100 milligrams per kilogram each for diesel, gasoline and motor oil, the soil will be acceptable for use as backfill.

I would appreciate your review of this information and an electronic response to the points summarized above for documentation purposes.

Price, Wayne

From: Price, Wayne
Sent: Thursday, March 03, 2005 4:58 PM
To: 'Tanya Akkerrman'; Price, Wayne
Cc: Jennifer Abrahams
Subject: RE: Status Update - Former Axelson Facility, Hobbs, New Mexico

OCD hereby approves of the work plan.

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

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

From: Tanya Akkerrman [mailto:takkerman@geotransinc.com]
Sent: Thursday, March 03, 2005 4:32 PM
To: WPrice@state.nm.us
Cc: Jennifer Abrahams
Subject: Status Update - Former Axelson Facility, Hobbs, New Mexico

Dear Wayne,

Per our telephone conversation this morning, I'm providing a status update on the former Axelson Facility located at 2703 W. Marland Boulevard in Hobbs, New Mexico.

Soil Remediation Activities

On November 5, 2004, GeoTrans, Inc. submitted a Soil Remediation Work Plan for the impacted soils at the subject property. Based on your conversations with Jennifer Abrahams (GeoTrans, Inc.), the work plan was conditionally approved with the understanding that Beazer East, Inc. was responsible for remediating impacted soils on the adjacent site owned by Mr. Lewis Wright. Beazer East, Inc. is currently negotiating an access agreement with Mr. Wright to complete the soil remediation activities. Once an access agreement is established with Mr. Wright, the soil remediation activities will be implemented. GeoTrans will provide you with a schedule for the field work once a schedule has been established.

Groundwater Activities

Based on our conversation this morning, GeoTrans understands that the two down gradient monitor wells located at the Key Energy facility (2625 W. Marland Boulevard) are to remain in place until after the soil remediation activities have been completed at the subject site. A final groundwater sampling event will be conducted at the down gradient wells once the soil remediation activities are complete.

GeoTrans will provide an update on the project status to your office within the next 6 to 8 weeks. If you have questions regarding this e-mail, please call me at (916) 853-1800 ext. 4514.

Sincerely,

Tanya Akkerman
GeoTrans, Inc.

P.S. GeoTrans, Inc. has moved office locations and our new address is: 10860 Gold Center Drive, Suite 200, Rancho Cordova, California 95670. Our phone and fax number have remained the same.

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

Please contact me if you have any questions concerning this information.

Regards,

Jennifer Abrahams, R.G.
Associate
Senior Hydrogeologist
GeoTrans, Inc.
10860 Gold Center Dr., Ste 200
Rancho Cordova, CA 95670-6070
916.853.1800 (tel)
916.853.1860 (fax)
jbrahams@geotransinc.com

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

Price, Wayne

From: Price, Wayne
Sent: Friday, February 14, 2003 4:13 PM
To: 'Tanya Akkerrman'
Subject: RE: Former Axelson Facility - Hobbs, NM

Approved!

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

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

From: Tanya Akkerrman [mailto:takkerman@geotransinc.com]
Sent: Friday, February 14, 2003 4:13 PM
To: WPrice@state.nm.us
Cc: Jennifer Abrahams
Subject: RE: Former Axelson Facility - Hobbs, NM

This e-mail is to summarize our telephone conversation this afternoon. The rationale for proposing to install temporary groundwater monitor wells at the Key Energy Services property is that Key Energy is resistant to having permanent wells installed in their equipment storage area. The permanent well installations would inconvenience their operations by having to provide on-going access to the wells. Installing temporary wells would inconvenience Key Energy Services for a short period of time (approximately 60 days) and also provide down-gradient water quality samples.

GeoTrans will pursue obtaining an access agreement with Key Energy Services to install temporary groundwater monitor wells at their property for approximately 60 days. The temporary groundwater wells will be installed, developed and initially sampled. A follow-up sampling event will be conducted with approximately 45 days. Therefore, changes in water quality during this time period will be evaluated. The temporary groundwater monitoring well analytical results will be reviewed and compared to WQCC and/or MCL levels. In the event that the analytical results are below the corresponding WQCC and/or MCL levels, the temporary wells will be abandoned. However, if the analytical results exceed the corresponding WQCC and/or MCL levels, the wells will remain in place as permanent installations.

GeoTrans will provide an update to the project status within approximately 30 days as requested by your office.

Sincerely,

Tanya Akkerman
GeoTrans, Inc.

>>> "Price, Wayne" <WPrice@state.nm.us> 02/14/03 01:30PM >>>
OCD would prefer permanent wells as to temporary wells. Our experience has shown 3-5 days would be considered temporary.

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

From: Tanya Akkerrman [mailto:takkerman@geotransinc.com]
Sent: Friday, February 14, 2003 2:31 PM
To: WPrice@state.nm.us
Cc: Jennifer Abrahams
Subject: RE: Former Axelson Facility - Hobbs, NM

Dear Mr. Price:

Thank you for your prompt response to my inquiry regarding the former Axelson facility in Hobbs, NM. I appreciate your concern regarding grab groundwater sampling and the potential for false negatives. However, I would like to propose completing temporary wells at the Key Energy site. The temporary wells would be developed and properly sampled prior to being removed and then the borings would be properly abandoned with neat cement to ground surface. The temporary wells would be in place for approximately 3-5 days. This alternative would allow GeoTrans to collect a proper groundwater sample and still work with Key Energy Services to obtain access to their property. The need for installing permanent groundwater monitoring wells at the Key Energy Services property will be evaluated once the soil and groundwater analytical results from the environmental investigation have been reviewed. GeoTrans and Key Energy Services are currently discussing access options for the environmental investigation. Please contact myself or Jennifer Abrahams to discuss this alternative.

Sincerely,

Tanya Akkerman
GeoTrans, Inc.
(916) 853-1800

>>> "Price, Wayne" <WPrice@state.nm.us> 02/13/03 08:33AM >>>

Dear Ms. Akkerrman:

Our experience in taking groundwater grab samples without completing the well properly and waiting a sufficient time has shown to produce false negatives. Therefore I recommend you proceed with negotiation of installing MW's with adjacent or near to your clients property. It is not unusual for landowners to require damages. The NM state land office charges \$300/well/year. Maybe this will give you an ideal of what charges are involved. Please give me another report within 30 days.

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

From: Tanya Akkerrman [mailto:takkerman@geotransinc.com]
Sent: Monday, February 10, 2003 5:45 PM
To: WPrice@state.nm.us
Cc: Jennifer Abrahams
Subject: Former Axelson Facility - Hobbs, NM

Dear Mr. Price:

On behalf of Beazer East Inc., GeoTrans is continuing to pursue off-site access agreements with the property owners located down-gradient from the former Axelson facility located at 2703 W. Marland Boulevard in Hobbs, NM. This e-mail is to inform your office of the current project status.

The property located immediately adjacent and down-gradient of the former Axelson facility is owned by Mr. Lewis Wright. In our discussions, Mr. Wright has been very resistive to allow the environmental investigation activities to be conducted without being compensated. Mr. Wright is seeking an exuberant amount of compensation in order to grant permission for the installation of groundwater monitoring wells. Based on the results of these discussions, GeoTrans is pursuing an access agreement with Key Energy Services.

The Key Energy Services service yard (2625 W. Marland Blvd) is located adjacent to Mr. Wrights property and is hydraulically down-gradient of the former Axelson facility. Key Energy Services representatives have been

receptive of GeoTrans inquiries into establishing a property access agreement to conduct the off-site environmental investigation activities. The Key Energy Services service yard is their central maintenance yard for this area of the state. GeoTrans has proposed completing the off-site borings along the western property boundary of the Key Energy Services service yard which is located approximately 165' east of the former Axelson facility. The area where the borings are proposed is a heavy equipment storage area for Key Energy.

As such GeoTrans and Key Energy Services discussed completing soil borings with grab groundwater sampling in this area as an alternative to installing groundwater wells. This will provide a snap shot of the groundwater conditions down gradient of the former Axelson facility. In light of the off-site property access issues encountered by GeoTrans, we would like discuss the grab groundwater sampling alternative with your office as a means of moving forward with the off-site environmental investigation activities. Please contact myself or Jennifer Abrahams to discuss this alternative and the status of the project.

Sincerely,

Tanya Akkerman
GeoTrans, Inc.
(916) 853-1800



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

June 19, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 8973

Mr. Mitchell Brouman
Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, Pennsylvania 15219

RE: Site Assessment Workplan
Former Axelson Facility
2703 West Marland Boulevard
Hobbs, New Mexico

The New Mexico Oil Conservation Division (OCD) is in receipt of the site investigation report dated September 06, 2001 and E-mail dated Friday 19, 2002 submitted by HSI GEOTRANS on behalf of Beazer East, Inc. and correspondence from the New Mexico Environment Department concerning the RCRA Solid Waste issues in letter dated March 09, 2001 and Naturally Occurring Radioactive Material (NORM) issues in letter dated April 11, 2002. **The OCD hereby approves of the Site Assessment Work Plan with the following conditions:**

1. BEAZER EAST, INC. will notify the OCD Santa Fe office and the OCD District office 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 during OCD's normal business hours.
2. BEAZER EAST, INC. shall submit the results of the investigation to the OCD Santa Fe Office **by September 30, 2002** with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
 - a. A description of all investigation, remediation and monitoring activities, which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.

Mr. Mitchell Broumar

June 19, 2002

Page 2

- c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
- d. Isopleth maps for contaminants of concern which were observed during the investigations.
- e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
- f. The quantity and disposition of all recovered product and/or wastes generated.

Please be advised that NMOCD approval of this plan does not relieve BEAZER EAST, INC. of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve BEAZER EAST, INC. 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) 476-3487 or E-mail WPRICE@state.nm.us.

Sincerely;



Wayne Price-Pet. Engr. Spec.

Cc: Jennifer A. Abrahams
HSI GEOTRANS
3035 Prospect Park Drive
Suite 40
Rancho Cordova, California 95670-6070

OCD Hobbs Office

Price, Wayne

From: Jennifer Abrahams [jabrahams@geotransinc.com]
Sent: Friday, April 19, 2002 4:26 PM
To: wprice@state.nm.us
Subject: Follow-up for the Former Axelson Facility, 2703 W. Marland Blvd, Hobbs, NM



photo4.jpg

This e-mail provides a summary of our March 2002 telephone discussion regarding the September 6, 2001 Site Investigation Report, Former Axelson Facility, 2703 W. Marland Boulevard, Hobbs, New Mexico. I have summarized your questions and provided responses below.

1. Provide the location of the analytical data sheets for the sample from Catch Basin 2.

The analytical data for the CB-2 sample are summarized in Tables 11, 12, 13, 14, and 15 and are included in Appendix C. The Chain-of-custody prepared on June 11, 2001 misidentifies sample CB-2 as CB-1. The laboratory "Cooler Receipt and Preservation Form" dated June 12, 2001 explains the discrepancy, stating "All samples for CB-1 labeled CB-2. Per Tanya Akkerman (GeoTrans), correct ID should be CB-2."

2. Describe how the catch basins and septic tank will be cleaned and closed.

The sludge will be vacuumed out of the basins and tank, and the vessels will be pressure washed. The septic tank will be removed during the soil remediation phase of work.

3. Laboratory sheets indicate MRL - how is this different from MDL and PQL.

The MDL, method detection limit, is based on a study of spiking a blank at a known concentration and analyzing the sample 7 times. The MDL is a value based on the analytical instrument and the sample preparation. The MDL, defined in 40 CFR part 136, is the appropriate limit to use to determine if the target analyte is present, but not to quantify the analyte.

The MRL, method reporting limit, is for quantification of the analyte. The MRL is based on the MDL and the lowest concentration of the calibration standard. The MRL is equal to the PQL, practical quantification limit.

MDL < MRL EPA guidance states that the MRL should be 3 - 5X the MDL.

4. Wells MW-1 and MW-2 are dry, but have small amounts of sludge at the bottom of the well. This sludge is to be removed.

Wells MW-1 and MW-2 will be checked to confirm the presence of sludge. If present, the sludge will be vacuumed out when the catch basins and septic tank are cleaned and emptied.

5. Page 19 of the text identified the sludge in the catch basins and septic tank as a non-RCRA hazardous waste. Please classify the waste using RCRA guidance.

According to the toxicity characteristic in 40 CFR 261.24, the sludge is non-hazardous, and Dave Cobrain of the New Mexico Environment Department Hazardous Waste Bureau agreed with this assessment. Dave issued a letter on April 16, 2002 providing a determination of the sludge in the two catch basins and septic tank. The sludge may be handled as nonhazardous solid waste providing the facility is in compliance with OCD regulations.

6. The report recommends the installation of two monitoring wells downgradient of the Site. Please indicate the proposed location of the wells.

The wells will be installed a few hundred feet downgradient (southeast) of the septic

tank. The locations are dependent on access to the property to install the wells. Additionally, the locations are dependent on rig access. The attached jpg file shows that overhead structures are present on the adjacent property east of the Site. The photographer is standing west of the septic tank and is looking east.

7. Obtain confirmation from the Radiation Control Bureau that the recommendations for NORM work are acceptable.

Ms. Sherry Miller of the Radiation Control Bureau issued a letter on April 11, 2002 stating that GeoTrans is authorized to proceed with additional assessment and remediation as necessary to comply with New Mexico Radiation Protection Regulations.

8. GeoTrans intends to install 3 - 4 additional soil borings in the vicinity of the septic tank to refine the understanding of the extent of soil impacts to assist with the design of the soil remediation.

On behalf of Beazer East, Inc., GeoTrans will implement the recommended actions presented in the 9/6/01 Site Investigation Report and described in this e-mail following receipt of your approval.

Please contact me if you have any questions regarding this information.
Regards,

Jennifer Abrahams, R.G.
Senior Hydrogeologist
GeoTrans, Inc.
3035 Prospect Park Dr., Ste 40
Rancho Cordova, CA 95670
916.853.1800 (tel)
916.853.1860 (fax)





GARY E. JOHNSON
GOVERNOR

State of New Mexico
Environment Department
RADIATION CONTROL BUREAU
1190 St. Francis Dr., 87505
P.O. Box 26110, 87502-6110
Santa Fe, New Mexico
Telephone (505) 476-3236
Fax (505) 476-3232

<http://www.nmenv.state.nm.us/nmrcb/home.html>



PETER MAGGIORE
SECRETARY

April 11, 2002

Wayne Price
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505

Phone: (505) 476-3487
Fax: (505) 476-3462

RE: AXELSON FACILITY NORM CLEANUP

Dear Mr. Price:

The Bureau has completed a review of the Site Investigation Report for the former Axelson Facility located at 2703 W. Marland Boulevard in Hobbs, New Mexico, prepared by GeoTrans for Beazer East, Inc.

Based upon the evidence as submitted by Safety and Environmental Solutions, Inc., I agree with GeoTran's conclusion that the naturally occurring radioactive material (NORM) sites need further study to delineate the vertical and horizontal extent of the contamination.

Therefore GeoTrans is hereby authorized to begin further site assessment regarding the NORM materials, and any remediation as deemed necessary to comply with the New Mexico Radiation Protection Regulations 20.3.14 NMAC. If you would, please notify the Bureau when you expect NORM characterization and subsequent remediation to begin. We may want to send someone to the site to observe activities. If you have any questions or if I can be of further assistance, please call me at (505) 476-3231.

Sincerely,

A handwritten signature in cursive script that reads "Sherry Miller".

Sherry Miller
Radiation Specialist

cc: Jennifer A. Abrahams, R.G., GeoTrans, Inc.

Price, Wayne

From: Jennifer Abrahams [jabrahams@geotransinc.com]
Sent: Thursday, March 28, 2002 3:36 PM
To: wprice@state.nm.us
Subject: Former Axelson Facility, Hobbs, NM

Hello Wayne,

This e-mail is to let you know that I am working on responding to your questions of 3/12/02. Here is my status to date:

1. I have contacted Dave Cobrain at the Hazardous Waste Bureau, and he said that his review of the analytical data for the sludge in the 2 catch basins and the septic tank do not appear to be hazardous. Dave also stated that the existing analytical results should be acceptable to the OCD permitted landfill. I will send a letter to Dave requesting his designation of waste classification, and he will respond in writing, and "cc" you.

Dave recommended that I request from you the names of the permitted OCD landfills in Hobbs.

2. I have contacted Sherry Miller at the Radiation Control Bureau, and she said that she concurs with the recommended NORM actions identified in the September 6, 2001 Site Investigation Report for the Former Axelson Facility in Hobbs, New Mexico. Sherry will send you a letter stating her concurrence.

3. I have a detailed response to your question regarding the difference between MRL, MDL, and PQL

4. With regard to the method of closing the catch basins and septic tank, and the location of the 2 monitoring wells, I need to contact my client, who is on vacation.

I anticipate that I will be able to send you another e-mail responding to your questions, and explaining the approach for additional work at the former Axelson site by April 19, 2002.

Regards,

Jennifer Abrahams, R.G.
Senior Hydrogeologist
GeoTrans, Inc.
3035 Prospect Park Dr., Ste 40
Rancho Cordova, CA 95670
916.853.1800 (tel)
916.853.1860 (fax)

September 6, 2001

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Mr. Wayne Price
Petroleum Engineer Specialist
New Mexico Oil Conservation District
1220 South St. Francis Drive
Santa Fe, NM 87505

RECEIVED
SEP 10 2001
Environmental Bureau
Oil Conservation Division

RE: Site Investigation Report
Former Axelson Facility
Hobbs, New Mexico

Dear Mr. Price:

On behalf of Beazer East, Inc., please find enclosed one copy of the Site Investigation Report for the former Axelson Facility, located at 2703 West Marland Boulevard, Hobbs, New Mexico (Site). This report summarizes the June 2001 Site investigation activities performed in accordance with GeoTrans' October 2000 Workplan for the Site and your approval letter dated March 29, 2001. This report recommends additional activities to complete the characterization of impacts to Site soils and groundwater.

Please contact me at (916) 853-1800 if you have any questions regarding this transmittal.

Sincerely,

GEOTRANS, INC.



Jennifer A. Abrahams, R.G.
Senior Hydrogeologist

Enclosure

cc: Mitchell Brouman, Beazer East, Inc.
Jim McGinty, Halliburton
Bill Skaggs
Paul Sheeley, OCD Hobbs District Office

Jerrie Moore, Community Services and
Radioactive Materials
David Cobrain, Hazardous Waste Bureau

July 10, 2001

Mr. Wayne Price
Pet. Engr. Spec.
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Request for Site Investigation Report Extension
Former Axelson Facility
2703 W. Marland Boulevard
Hobbs, New Mexico

Dear Mr. Price:

Beazer East, Inc. submitted a Site Assessment Work Plan for the Former Axelson Facility located at 2703 West Marland Boulevard in Hobbs, New Mexico (Work Plan), dated October 6, 2000. The Work Plan was approved by the New Mexico Oil Conservation Division (OCD) in a letter dated March 29, 2001. The purpose of the Work Plan was to characterize the extent of petroleum hydrocarbon subsurface impacts from prior site use. The Work Plan was prepared by our consultant GeoTrans, Inc.

Based on subcontractor availability, the field work began on June 5, 2001. The field work was completed in accordance with the Work Plan and the OCD letter dated March 29, 2001. The field work included: 1) collecting soil and grab groundwater samples; 2) installing, developing, sampling and surveying four groundwater monitoring wells; 3) collecting sludge samples from the on-site septic tank and two concrete catch basins; and 4) conducting a naturally occurring radioactive material (NORM) screening level survey and collecting soil samples at selected locations for NORM analysis.

Based on the initial soil analytical results, additional analysis of the deeper soil samples is necessary to evaluate the vertical extent of petroleum hydrocarbon impacts at the subject site in accordance with the Work Plan. As requested by OCD, the groundwater samples were analyzed for the New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions, which includes radium 226/228. The laboratory turn-around-time for this analysis is 30 days; therefore the radium analytical results will not be available until at least the third week of July.

The OCD had requested, in the March 29, 2001 letter, that the results of the site investigation be submitted by June 30, 2001. Based on subcontractor availability, the additional laboratory analyses and extended laboratory turn-around-time for radium, the site investigation analytical

July 10, 2001

results will not be available by June 30, 2001. Therefore, Beazer East, Inc. is formally requesting that the OCD extend the site investigation report deadline to September 7, 2001.

Please call me if you have questions regarding the extension request. If you have technical questions about the status of the site investigation results, please contact Martha Mackie at (908) 730-0014 or Tanya Akkerman at (916) 853-1800.

Sincerely,



Martha Mackie, PG
GeoTrans, Inc.

cc: M. Brouman, Beazer East
J. McGinty, Haliburton
B. Staggs, Site Owner

Price, Wayne

From: Price, Wayne
Sent: Friday, March 30, 2001 10:44 AM
To: 'takkerman@geotransinc.com'
Subject: Beazer East- Old Axelson Site Work Plan Approval

Dear Tanya:

Please find enclosed a copy of the work plan approval sent out yesterday. Please note that OCD accepted your approach at this time on the soil investigation using the EPA's HHSLs= US EPA Region 6 Human Health Medium-Specific Screening Levels for Industrial soils. However, Since OCD did not have a copy of that procedure we could not determine what protection levels these were designed for i.e. groundwater, human health, etc. Please advise your client (Beazer East) this issue should be addressed before closure.



Workapp.doc



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

March 29, 2001

Lori Wrotenberg
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3771 7217

Mr. Mitchell Brouman
Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, Pennsylvania 15219

OGR 10 & 195504

RE: Site Assessment Workplan
Former Axelson Facility
2703 West Marland Boulevard
Hobbs, New Mexico

The New Mexico Oil Conservation Division (OCD) is in receipt of the site investigation workplan dated October 06, 2000 submitted by HSI GEOTRANS on behalf of Beazer East, Inc. and correspondence from the New Mexico Environment Department concerning the RCRA Solid Waste issues in letter dated March 09, 2001 and Naturally Occurring Radioactive Material (NORM) issues in letter dated March 20, 2001. **The OCD hereby approves of the Site Assessment Work Plan with the following conditions:**

1. All Monitor wells shall be installed as permanent wells and completed as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

- e. A concrete pad shall be placed at the surface around the well. The well shall be installed with a suitable protective locking device.
 - f. The well(s) shall be developed after construction using EPA approved procedures.
2. All Monitor wells shall be installed as permanent wells and no less than 48 hours after the well(s) are developed, ground water from all monitor well(s) shall be purged, sampled and analyzed for Volatile Organics (EPA method 8260), Semi-Volatile Organics (EPA method 8270), polycyclic aromatic hydrocarbons (PAH), total dissolved solids (TDS) and New Mexico Water Quality Control Commission (WQCC) metals and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
3. BEAZER EAST, INC. will notify the OCD Santa Fe office and the OCD District office 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 during OCD's normal business hours.
4. The solid waste in the septic tank, wash vat (if still on site) and two catch basins shall be sampled and tested to determine if these waste are RCRA hazardous waste pursuant to EPA CFR 40 part 261. Any waste that is classified as RCRA Hazardous waste shall be handled pursuant to the letter from the New Mexico Environment Department to Geo Trans, Inc. dated March 20, 2001.
5. The OCD defers comment at this time concerning the plugging of the on-site water well located in the northwest part of the yard.
6. The NORM investigation shall be pursuant to the letter from the New Mexico Environment Department to Geo Trans, Inc. dated March 20, 2001.
7. BEAZER EAST, INC. shall submit the results of the investigation to the OCD Santa Fe Office **by June 30, 2001** with a copy provided to the OCD Hobbs District Office and shall include the following investigative information:
 - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table potentiometric map showing the location of the leaks and spills, excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern which were observed during the investigations.

- e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
- f. The quantity and disposition of all recovered product and/or wastes generated.

Please be advised that NMOCD approval of this plan does not relieve BEAZER EAST, INC. of liability should their investigations and/or operations fail to adequately investigate and/or remediate contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve BEAZER EAST, INC. 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) 476-3487.

Sincerely;



Wayne Price-Pet. Engr. Spec.

Cc: Tanya Akkerman E-Mail takkerman@geotransinc.com
HSI GEOTRANS
3035 Prospect Park Drive
Suite 40
Rancho Cordova, California 95670-6070

OCD Hobbs Office



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
COMMUNITY SERVICES AND RADIOACTIVE MATERIALS
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1862 phone
(505) 827-1863 fax



PETER MAGGIORE
Secretary

RECEIVED
MAR 21 2001
OBSERVATION DIVISION

March 20, 2001

Geo Trans, Inc.
Attn: Ms Jennifer Abrahams, R.G.
3035 Prospect Park Drive, #40
Rancho Cordova, CA 95670-6070

Dear Ms. Abrahams:

This letter is a follow up to our phone conversation regarding the site assessment for the former Axelson Facility in Hobbs, New Mexico. Due to the fact that the original workplan submitted to the NMOCD indicated elevated levels of NORM at the site, a copy of Appendix A "Regulation Guidelines for the Management of NORM in the Oil and Gas Industry in New Mexico" was sent to you.

Using this document as a guide, the site needs to be characterized as to the extent of NORM contamination. This can be done at the same time you are doing the other characterizations for the NMOCD. Once this is done and the results reviewed by this Department, then the decontamination of the site can be done. I have supplied you names of consultants that could help with this project but if you need further help please call me.

The contact for this project with the NORM, should I not be available, is Mr. William Floyd at 505-827-1862. You will also want to cc: Wayne Price at the NMOCD for his information.

If I can be of any help please give me a call at 505-841-9492.

Sincerely,

Jerrie Moore
Environmental Specialist

CC: Wm Floyd, Program Manage, NMED
Wayne Price, NMOCD



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2044 A Galisteo Street
Santa Fe, New Mexico 87505
Telephone (505) 827-1557
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 9, 2001

HIS GeoTrans
3035 Prospect Park Drive, Suite 40
Rancho Cordova, California 95670

RE: RCRA STATUS DETERMINATION
BEAZER EAST INC. (FORMER AXELSON FACILITY)
2703 WEST MARLAND BOULEVARD
HOBBS, NEW MEXICO

Attention: Ms. Jennifer Abrahams:

This letter provides a determination regarding the status of the Beazer East Inc. facility (former Axelson oil field service company) located at 2703 West Marland Boulevard in Hobbs, New Mexico. The New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD) referred the site to the New Mexico Environment Department Hazardous Waste Bureau (HWB) for a determination on whether the site is regulated under the Resource Conservation and Recovery Act (RCRA) incorporated by the New Mexico Hazardous Waste Act [NMSA 1978, Sections 74-4-1 *et seq.* (Repl. Pamph. 1993)].

Based on our review of the "Site Assessment Workplan, Former Axelson Facility" submitted by Beazer East, Inc. to the OCD dated October 6, 2000, the facility is not subject to RCRA corrective action requirements providing that the facility is in compliance with OCD regulations. Hazardous constituents, as defined by RCRA, were detected in samples obtained at the facility; therefore, waste generated during site assessment and corrective action activities is subject to RCRA solid and/or hazardous waste handling and disposal requirements.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

February 16, 2001

James Bearzi-HWB Bureau Chief
New Mexico Environment Department
Hazardous Waste Bureau
2044-A Galisteo St.
Santa Fe, New Mexico 87505

Dear Mr. Bearzi:

Please find enclosed a copy of a recent correspondence from the New Mexico Oil Conservation Division (OCD) to Beazer East, Inc. an operator of a past oil field service company located in Hobbs, New Mexico. A site investigation report indicated there is possibly RCRA and NORM regulated waste remaining on-site. Therefore until these issues are resolved the OCD is referring this case to your agency.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief
RCA/lwp

xc: OCD Hobbs Office

Attachment-1



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenberg
Director
Oil Conservation Division

February 16, 2001

Bill Floyd
New Mexico Environment Department
Radiation Protection Program
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Mr. Floyd:

Please find enclosed a copy of a recent correspondence from the New Mexico Oil Conservation Division (OCD) to Beazer East, Inc. an operator of a past oil field service company located in Hobbs, New Mexico. A site investigation report indicated there is possibly RCRA and NORM regulated waste remaining on-site. Therefore until these issues are resolved the OCD is referring this case to your agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief
RCA/lwp

xc: OCD Hobbs Office

Attachment-1



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

February 15, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3771 7057

Mr. Mitchell Brouman
Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, Pennsylvania 15219

RE: Site Assessment Workplan
Former Axelson Facility
2703 West Marland Boulevard
Hobbs, New Mexico

The New Mexico Oil Conservation Division (OCD) is in receipt of the site investigation workplan dated October 06, 2000 submitted by HSI GEOTRANS on behalf of Beazer East, Inc. The OCD has determined this agency cannot approve of the plan at this time for the following reasons:

1. The report indicated on page 7 (copy enclosed) "Six surface samples contained radium 226 at concentrations above the proposed State of New Mexico NORM regulatory action level for Radium 226 of 30 pico Curies per gram (pCi/gm). One Sludge sample from the concrete catch basins contained radium 226 at concentrations above the proposed regulatory action level.

The agency responsible for regulating this activity would be the New Mexico Environment Department- Radiation Protection Program. Please contact Mr. Bill Floyd at 505-827-1862.

2. Table 4 (copy enclosed) of the report indicated high levels of RCRA metals and Table 7 (copy enclosed) indicated the presence of "Chlorinated Solvents" found in various samples collected.

It appears these may be RCRA regulated wastes. The agency responsible for regulating this activity would be the New Mexico Environment Department-Hazardous Waste Bureau. Please contact Mr. James Bearzi-Hazardous Waste Bureau Chief @ 505-827-1567.

Therefore, the OCD is referring this case to the above mentioned agencies.

Sincerely;



Wayne Price-Pet. Engr. Spec.

Attachments-3

Cc: Ms Jennifer A. Abrahams, R.G.
HSI GEOTRANS
3035 Prospect Park Drive
Suite 40
Rancho Cordova, California 95670

James Bearzi-HWB Bureau Chief
New Mexico Environment Department
Hazardous Waste Bureau
2044-A Galisteo St.
Santa Fe, New Mexico 87505

Bill Floyd
New Mexico Environment Department
Radiation Protection Program
P.O. Box 26110
Santa Fe, New Mexico 87502

Roger C. Anderson-Environmental Bureau Chief
New Mexico Oil Conservation Div.

OCD Hobbs Office

RCRA 8 Metals. Both sludge samples contained TPH concentrations that exceeded the OCD action level, however, the metal results were below the EPA HHSLs for industrial soils.

4.1.2 Catch Basins

Two sludge samples were collected from the concrete catch basins. The sludge samples were analyzed for TPH, VOCs, and RCRA 8 Metals. Both sludge samples contained TPH concentrations that exceeded the OCD action level. The sludge samples did not contain detectable concentrations of VOCs. RCRA 8 metal results for the sludge samples were below the EPA HHSLs for industrial soils.

4.1.3 Background Sample

One surface soil background sample (HBG-1) was collected along the northeast boundary of the Site, as shown on Figure 2. The background area was considered to be unimpacted by normal facility operations. The background soil sample was analyzed for TPH and RCRA 8 Metals. The TPH and RCRA 8 metals concentrations were below the corresponding regulatory action levels.

4.1.4 NORM Sampling

EME conducted a Site survey of radiation levels using a 2.0-inch thin window GM detector. The survey map was used to identify areas potentially impacted by NORM. Fourteen surface soil samples, collected from 0 to 0.5 feet bgs, and four sludge samples were collected and analyzed for NORM (specifically radium 226 and 228). Analytical NORM results are presented in Table 5 and sample locations are identified in Figure 2.

Six surface soil samples contained radium 226 at concentrations above the proposed State of New Mexico NORM regulatory action level for Radium 226 of 30 pico Curies per gram (pCi/gm). One sludge sample from the concrete catch basins contained radium 226 at concentrations above the proposed regulatory action level.

Table 4
 Summary of Soil Analytical Results
 RCRA 8 Metals

February 1995

| Sample ID | Sample Depth (ft. bgs.) | Arsenic | Barium | Cadmium | Chromium (Total) | Lead | Mercury | Selenium | Silver |
|---------------------------------|----------------------------|---------|---------|---------|---------------------|-------|---------|----------|--------|
| H1-1E | 6-8 | 6.8 | 78.0 | 1.3 | 12.0 | 14.0 | < 0.05 | < 0.1 | 2.3 |
| H1-1L | 20-22 | 2.7 | 61.0 | 0.5 | 7.0 | 7.0 | < 0.05 | < 0.1 | 1.2 |
| H1-2E | 8-10 | 11.0 | 37.0 | 0.9 | 8.0 | 12.0 | < 0.05 | < 0.1 | 1.5 |
| H1-2H | 14-16 | 5.1 | 166.0 | 0.8 | 9.0 | 9.0 | < 0.05 | < 0.1 | 1.7 |
| H1-3I | 16-17 | 5.9 | 808.0 | 1.1 | 10.0 | 12.0 | < 0.05 | < 0.1 | 1.7 |
| H1-3K | 29-31 | 4.3 | 140.0 | 0.3 | 4.0 | 3.0 | < 0.05 | < 0.1 | < 0.5 |
| H1-5D | 14-16 | 4.9 | 244.0 | 1.1 | 12.0 | 16.0 | < 0.05 | < 0.1 | 2.5 |
| H1-8D | 29-31 | 5.1 | 525.0 | 1.1 | 11.0 | 18.0 | < 0.05 | < 0.1 | 1.9 |
| H3-1A (concrete catch basin) | Sludge | 11.0 | 53.0 | 6.8 | 12.0 | 179.0 | < 0.05 | < 0.1 | 1.3 |
| H3-2 (concrete catch basin) | Sludge | 7.3 | 78.0 | 5.0 | 124.0 | 592.0 | < 0.05 | < 0.1 | < 0.5 |
| H4-1 (septic tank) | Sludge | 6.5 | 104.0 | 10.0 | 86.0 | 776.0 | < 0.05 | < 0.1 | 0.9 |
| H5-1 (wash vat tank) | Sludge | 4.8 | 129.0 | 9.9 | 206.0 | 660.0 | < 0.05 | < 0.1 | < 0.5 |
| HBG-1A (background) | 0-0.5 | 16.0 | 256.0 | 1.1 | 6.0 | 26.0 | < 0.05 | < 0.1 | < 0.5 |
| HHLS | --- | 360 | 100,000 | 1,000 | 450 | 2,000 | 610 | 10,000 | 10,000 |

Note: Data collected by Environmental Management & Engineering, Inc.
 All results reported as milligrams per kilogram (mg/kg = ppm).
 RCRA 8 Metals analyzed using EPA Method 3010/3020/7000.

HHLS = U.S. EPA Region 6 Human Health Medium-Specific Screening Levels for industrial soils.

Table 7
 Summary of Water Analytical Results
 Volatile Organic Compounds

February 1995

| Sample ID | Location | 1,2,4-Trimethylbenzene | 1,2-Dichloroethane | 1,3,5-Trimethylbenzene | 4-Isopropyltoluene | Benzene | Ethylbenzene | n-Butylbenzene | Naphthalene | tert-Butylbenzene | Tetrachloroethene <i>PCE ?</i> | Toluene | Xylenes (Total) |
|-----------|------------------|------------------------|--------------------|------------------------|--------------------|-------------|--------------|----------------|-------------|-------------------|-----------------------------------|---------|-----------------|
| H1-8 | grab groundwater | 0.012 | <0.005 | <0.005 | 0.01 | <0.005 | <0.005 | 0.01 | 0.015 | 0.01 | <0.005 | <0.005 | <0.005 |
| H6-1 | water well | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 |
| MW-1 | monitor well | 4.7 | <0.005 | 1.5 | 1.0 | 0.24 | 0.28 | <0.005 | <0.005 | <0.005 | <0.005 | 1.2 | 1.225 |
| MW-2 | monitor well | 0.14 | <0.005 | 0.15 | 0.145 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | 0.065 | <0.005 |
| MW-3 | monitor well | <0.005 | 0.01 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005 | 0.007 | <0.005 | <0.005 |
| WQCC | --- | --- | --- | --- | --- | --- | --- | --- | 0.03 | --- | --- | 0.75 | 0.62 |
| MCLs | --- | --- | 0.005 | --- | --- | 0.005 | 0.7 | --- | --- | --- | 0.005 | --- | --- |

Note: Data collected by Environmental Management & Engineering, Inc.
 All results reported as milligrams per liter (mg/L = ppm). Only detected analytes listed.
 Volatile Organic Compounds analyzed using EPA Method 8260.
 Concentrations in bold exceed the WQCC or MCL values.
 Semi Volatile Organic Compounds (SVOCs) not detected in the above listed water samples.

Most stringent comparison criteria listed when both WQCC and MCL values exist.

WQCC = New Mexico Water Quality Control Commission Groundwater Standards
 MCLs = U.S. EPA Drinking Water Maximum Contaminant Levels



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Protection and Remediation Bureau

Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2918 phone
(505) 827-2965 fax

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

September 21, 1995

LeRoy L. DeNooyer
Senior Attorney
Dresser Industries, Inc.
2001 Ross Ave.
Dallas, Texas 75201

Dear Mr. DeNooyer:

The New Mexico Environment Department, Ground Water Protection and Remediation Bureau (NMED) is in receipt of your letter of September 14, 1995 and the attached investigation report for the Axelson, Inc. facility at 2730 West Maryland, Hobbs, NM. This report provides notice of a discharge to soil and ground water, at the Axelson facility, as required by N.M. Water Quality Control Commission (WQCC) regulation 1-203.

Axelson is an oil-field service industry, and the WQCC has delegated responsibility for such facilities to the Oil Conservation Division (OCD). I am therefore referring this case to Rodger Anderson of the OCD, who can be reached at 505/827-7152.

Although the report is labeled "Privileged & Confidential" I regret to inform you that it does not appear to qualify as confidential information under Section 74-6-15 of the New Mexico Water Quality Act. NMED maintains a computerized data base of all ground-water contamination in the state, regardless of jurisdiction. The Axelson site will be entered in the data base.

Given the complicated site background described in your letter, we are most appreciative that Dresser took the initiative to provide the required notification. I wish you the best of luck in resolving this situation.

Sincerely,

Dennis McQuillan

Dennis McQuillan
Remediation Manager

xc Myra Meyers, Hobbs Field Office
Rodger Anderson, OCD