1R - 299

APPROVALS

YEAR(S):

2003-2002

Price, Wayne

From: Price, Wayne
Sent: Wednesday, February 26, 2003 4:07 PM
To: 'KRSpringer@ShellOPUS.com'
Cc: 'Jkind1111@aol.com'
Subject: OCD Case 1R0299

Dear Mr. Springer:

The OCD hereby approves backfilling of the excavated area with clean soils and installing a three foot thick clay cap as shown on fig 2 dated February 2003. The cap shall meet a permeability of 1x 10-7 cm/sec and compacted pursuant to ASTM D698-70 or D 1557-70. Once backfilling is complete please continue with the groundwater investigation. Please provide OCD a progress report with conclusion s and recommendations by April 30, 2003.

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

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Price, Wayne

From: Price, Wayne
Sent: Wednesday, August 28, 2002 11:47 AM
To: 'Landreneau EK (Kyle)'
Cc: Johnson, Larry; Sheeley, Paul
Subject: Groundwater Impact --Penrose "A" Lease Winnie Kennan Ranch OCD Case # 1R0299

Dear Mr. Landreneau:

The OCD is in receipt of the report dated June 21, 2002 for the above subject facility notifying OCD of the groundwater impact, an action plan for closing the excavated area and further groundwater delineation. OCD hereby approves of the plan with the following conditions:

1. Provide for OCD approval, the proposed installation and engineering design of the clay liner. Please include a top and side view drawing, values of the remaining contaminants under the liner, plans on how the permeability of the liner will be verified, leeching information and any other pertinent information to assist OCD in its evaluation.

2. Pursuant to OCD Rule 19 NMAC 15.A 19.D (Exemptions from Abatement Plan Requirement) On an emergency basis, Equiva shall provide a plan to remove the free phase product from the groundwater.

3. 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 Equilon 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 Equilon of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

cc: Mr. Leo Simms

Price, Wayne

From: Price, Wayne
Sent: Monday, February 11, 2002 2:55 PM
To: 'Landreneau EK (Kyle)'
Subject: RE: Penrose Lease A (Kennan)

The work plan is hereby approved with the following conditions:

1. 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.
2. The temporary monitor well shall be developed and purged pursuant to EPA methods. The samples shall be collected no sooner than 48 hours after the well has been installed.

Please be advised that NMOCD approval of this plan does not relieve Equiva Services LLC 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 Equiva Services LLC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----
From: Landreneau EK (Kyle) [mailto:EKLandreneau@equiva.com]
Sent: Monday, February 11, 2002 2:15 PM
To: 'Price, Wayne'
Subject: RE: Penrose Lease A (Kennan)

-----Original Message-----
From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Monday, February 11, 2002 3:08 PM
To: 'Landreneau EK (Kyle)'
Subject: RE: Penrose Lease A (Kennan)

Dear Kyle:

I think I remember you sent the plan Via E-mail, I recently lost all of my E-mail in box, please resend and I will turn it around in 24 hours. Sorry for the inconvenience!

-----Original Message-----
From: Landreneau EK (Kyle) [mailto:EKLandreneau@equiva.com]
Sent: Monday, February 11, 2002 12:41 PM
To: Wayne Price (E-mail)
Subject: Penrose Lease A (Kennan)

Have you had a chance to look at the drilling work plan that I submitted?

Kyle Landreneau
Equiva Services LLC
PMB-284
40 FM 1960 West
Houston Texas 77090

Office 281-353-2069

Fax 281-353-2317
Cell 281-414-0490

Attached is a link to the SHE Customer Survey. Please comment on the level of service that you have received.
http://equivaservices.newcos.com/survey/survey.asp?surveyid=18

EQUIVA
SERVICES LLC
Shell, Texaco & Saudi Aramco Working Together

February 4, 2002

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Equiva Services, Inc.
Primrose "A" Lease
Southeast Eunice, NM Area

Dear Mr. Price:

Attached you will find a workplan for additional vertical delineation of crude oil impacted subsurface soils on the Equiva Services, Inc. Primrose "A" lease, located in the SW/ SE/4 Section 3 T23S R37E in Lea County, New Mexico.

Equiva had previously submitted a workplan to your office for the excavation and disposal of impacted soils at this site. Excavation was commenced and proceeded to a depth of approximately 40 feet below ground surface. At that depth, laboratory analysis of soil samples obtained from the excavation indicated TPH concentrations above the NMOCD recommended remediation level of 1,000 ppm. Since further excavation at this site is impractical, Equiva proposes to mobilize a truck mounted drilling rig to the site to install one soil boring to a depth sufficient to vertically delineate the extent of soil impact, or to the depth of first groundwater, whichever comes first.

Should you have any questions or comments concerning this letter , please contact my office at (281) 353-2069

Sincerely
EQUIVA SERVICES LLC

Kyle Landreneau

Kyle Landreneau CPG
Environmental Geologist
SHE/Science & Engineering

"Equiva Services LLC provides miscellaneous services, including environmental services, on behalf of its owners Motiva Enterprises LLC and Equilon Enterprises LLC, and on behalf of, Shell Oil Company, and Star Enterprise."

CC:: Leo Simms-Email

EQUIVA
SERVICES LLC
Shell, Texaco & Saudi Aramco Working Together

WORKPLAN

Equiva Services, L.L.C.
Primrose "A" Lease
(Southeast Eunice, N.M. area)

Site Location

The Equiva Services, L.L.C. Primrose "A" lease is located in the SW/4 SE/4 Section 3 T23S R37E of Lea County, New Mexico. A site location map, showing the exact location of the lease and proposed excavation site is attached as Map #1.

I. Site History and Investigation Results

The Primrose "A" lease is the site of a historic crude oil release, the exact age unknown. In the summer of 1999, Equiva Services directed Walton Construction, of Hobbs New Mexico to mobilize a trackhoe to the location in order to excavate test pits to determine vertical and horizontal extent of the hydrocarbon impacted soils. The soils excavated from the test pit and the excavation sidewalls were field screened visually and by smell. Results of the test pit installations indicate that crude oil impacted soil covers an area of about 65 feet square and extends to a depth of approximately 18 feet below ground surface. No soil samples were obtained for laboratory analysis during test pit installation.

In March, 2000, Equiva Services, LLC submitted a Workplan, detailing the proposed remediation operations for this site, to the NMOCD. Excavation operations began in August, 2000 and continued until November, 2000 when a pit approximately 100 feet by 100 feet and 40-45 feet in depth had been dug. Laboratory analytical results of soil samples from the bottom of the excavation indicated TPH concentrations in excess of the NMOCD recommended remediation level of 1,000 ppm.

In December, 2000, Equiva Services, LLC submitted to the NMOCD a letter detailing the excavation efforts undertaken to date. In addition to BTEX and TPH soil analysis required to determine compliance with NMOCD Remediation Action Levels, Equiva had analyzed soil samples from the bottom of the excavation for Synthetic Precipitation Leaching Procedure (SPLP) TPH, polycyclic aromatic hydrocarbons (PAHs), and SPLP volatile organic compounds (VOCs). Laboratory analytical results for those analytes were demonstrated to be lower than groundwater protective soil concentrations. Based on this information, Equiva requested concurrence from the NMOCD that the contaminant concentrations remaining in the excavation did not pose a threat to human health or the environment. Equiva proposed ceasing excavation and placing a three-foot clay cap at the bottom of the excavation before backfilling the pit with native soil.

II. Classification of Impacted Soils

The previous workplan submitted to the NMOCD demonstrated why the crude oil impacted soils at this site are exempt from RCRA Subtitle C regulations.

According to NMOCD guidelines, the impacted soils are classified as "Unsaturated Contaminated Soils."

III. Site Assessment and Groundwater Protection

The subject site is situated in extreme southeastern New Mexico, approximately 24 miles southwest of Hobbs. The area lies within both the Permian Basin and the Llano Estacado and is characterized by an arid climate. Topography is relatively flat and the surface is covered with scrub vegetation. Rainfall averages 12.5 inches per year. Regional drainage is to the east at approximately 35 feet per mile. There are no perennial or intermittent streams or other surface bodies of water within a one-mile radius of the subject site, nor are there any groundwater discharge sites. A water well search was performed by Banks Information Systems, Inc. Results of the search indicated that a total of nine water wells (five individual wells and two water well clusters) are located within a one-mile radius of the property. The wells are reportedly completed in the Ogallalah at depths ranging from 75 feet bgs to 380 feet bgs. The wells are used for domestic water supply and to supply water to livestock. Total dissolved solids (TDS) have not been measured, but are expected to closely resemble the TDS concentrations in the Ogallalah aquifer at the Jal-Cooper Cemetery wells, located approximately 9.5 miles southwest of the subject site. TDS of water from those wells is 782 ppm.

On-site soils consist of alluvial red beds from the surface to a depth of approximately 5 feet bgs. The red beds are underlain by caliche and discontinuous sand stringers from 5 feet bgs to approximately 130 feet bgs. The Ogallala, consisting of consolidated beach sand is expected to be encountered at a depth of approximately 75 feet bgs.

According to water well completion information obtained from Banks Information Solutions, Inc. and submitted with the previous workplan, minimum depth to groundwater in the site vicinity is 75 feet below ground surface.

IV. Workplan

Equiva proposes to mobilize a truck mounted mobile air rotary drilling rig to the site and install one soil boring in the middle of the existing excavation. The boring will be advanced until field screening of drill cuttings indicate that contamination is no longer present or until groundwater is encountered, whichever is shallower. Soil samples will be collected on five-foot centers and field screened for volatile hydrocarbons with a flame ionization detector (FID) or photo-ionization detector (PID). Drill cuttings will be continuously examined. Because of the age of the spill, it is anticipated that the majority of volatile hydrocarbons which previously were entrained in the crude oil have been volatilized, leaving little behind to be detected by the FID or PID. Therefore, Equiva will also field screen the samples for

TPH with a DEXSIL® Petroflag hydrocarbon test kit. The Petroflag analyzes soil for TPH by an immunoassay method (EPA SW-846, Method 9074).

When field screening of soil samples indicates that the boring has been advanced beyond the vertical extent of soil hydrocarbon impact, a final soil sample will be obtained from the bottom of the boring and forwarded to the laboratory for analysis for BTEX and TPH. The boring will then be properly abandoned, in accordance with NMOCD regulations. If laboratory analytical results for the soil sample obtained at the bottom of the boring indicate benzene, BTEX or TPH concentrations above NMOCD recommended remediation levels, then the analyte exceeding those levels will also be analyzed for SPLP. If TPH exceeds the NMOCD remediation level, that sample will be analyzed for PAH in addition to SPLP TPH.

If groundwater is encountered before field screening indicates the vertical extent of soil contamination has been determined, the boring will be advanced five feet below the top of groundwater, a temporary monitor well will be set, and groundwater samples will be obtained for laboratory analysis. A soil samples from the capillary fringe will also be obtained for analysis. Soil and water samples will be forwarded to the laboratory for analysis for BTEX and TPH, as described above.

Upon receipt of analytical results, Equiva will prepare a report for the NMOCD, detailing the results of this investigation and making recommendations for either further remedial efforts or closure, as conditions warrant.