

2R - 5

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

1995

**ALL AMERICAN  
PIPELINE COMPANY**

OIL CONSERVATION DIVISION  
RECEIVED

October 16, 1995

195 OCT 21 AM 8 52

Mr. Mark Ashley  
NEW MEXICO CONSERVATION DIVISION  
Environmental Bureau  
2040 South Pacheco  
Santa Fe, NM 87505

Dear Mr. Ashley:

**SUBJECT: ROCK COVER AT ALL AMERICAN PIPELINE COMPANY'S  
LORDSBURG STATION**

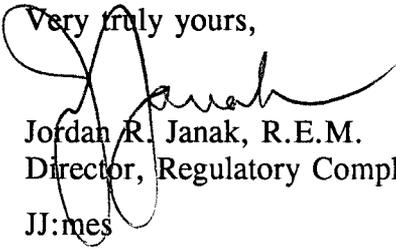
In response to your request for additional information regarding the disposition of the rock cover at our Lordsburg Station which was contaminated by a crude oil heater fire on August 3, 1995, the following is provided:

1. Mr. Larry Lydel of the New Mexico State Engineer's office in Deming was contacted in our investigation to determine the water table depth in the area of our Lordsburg Station. Mr. Lydel indicated that groundwater data for the Animas / Lordsburg valleys is sparse. He stated that in general, New Mexico groundwater authorities consider groundwater depth in the area of our station to be between 100 and 300 feet.
2. To address your concern about the total concentration levels for arsenic, barium, chromium and lead resulting from the initial analysis of the rock material, we had our laboratory perform a TCLP for these metals in accordance with EPA procedure requirements. The results of the TCLP analysis are attached. Please note that the results for the extractable concentrations for arsenic, chromium and lead are less than the minimum reporting level and the barium concentration is only 1.5 percent of the RCRA maximum allowable concentration.

We trust that the conclusion you will make from this information is that based on the total and extractable concentration of contaminants on the rock cover and the depth of groundwater, there is no threat to groundwater contamination at our Lordsburg Station. We request that the Oil Conservation Division allow All American to use the subject rock as station ground cover without further action.

If you have any questions, please do not hesitate to call, ~~(805) 398-5345~~.

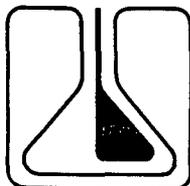
Very truly yours,

  
Jordan R. Janak, R.E.M.  
Director, Regulatory Compliance

JJ:mes

cc: w/attachment  
D. Crumbliss

BAKERSFIELD  
661-587-2080  
713-646-4100  
(HOUSTON) CORP.



ZALCO LABORATORIES, INC.  
Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(805) 395-0539  
FAX (805) 395-3069

All American Pipeline Co.  
P O Box 40160  
Bakersfield, CA 93384-0160

Laboratory No: 45436  
Date Received: 9-20-95  
Date Reported: 9-29-95  
P O #: AA92-16678R

Attention: Jordan Janak

Sample: Brown Solid (type i)

Sample Description: Lordsburg Station Rock Cover (Original Lab # 45130)  
Sampled by Dick Crumbliss on 9-20-95

Toxicity Characteristic Leaching Procedure, 1311/1

<u>Metals</u>	<u>Extractable Concentration mg/l</u>	<u>RCRA Maximum Concentration mg/l</u>	<u>MRL mg/l</u>	<u>Method/ Reference</u>
Arsenic, As	< 0.005	5.0	0.005	7061/1
Barium, Ba	1.5	100.0	0.1	6010/1
Chromium, Cr	< 0.05	5.0	0.05	6010/1
Lead, Pb	< 0.05	5.0	0.05	6010/1

MRL = Minimum Reporting Level

Reference:

1. EPA SW-846, 1986 3rd Edition.

JE/1b

cc: Ernest Herford, AAPL, 6840 District Blvd., Bakersfield, CA 93313



Jim Etherton  
Lab Operations Manager

Client: All American Pipeline Company  
P O Box 40160  
Bakersfield, CA 93309

Order No.: 45436  
Page No.: 1  
Project:  
Ordered : 09/20/95 11:20  
Due Date: 10/02/95

Attn: Jordan Janak  
Phone: (805) 398-5345

Collected By: Dick Crumbliss

WORK ORDER

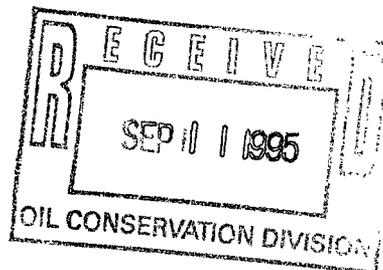
GRP	SAMPLE ID	DESCRIPTION	SAMPLED	# OF CONTAINERS	MATRIX	DET CODE	DETERMINATION	METHOD
1	45436-1	Lordsburg Statio	09/20/95	1	Haz Waste	2905	TCLP Conv. Bottle Extraction	1311
						7602	Digestion, Water	3020
						7658	Barium, Ba	6010
						7668	Chromium, Cr	6010
						7682	Lead, Pb	6010
						7640	Arsenic (Hyd-AA)	7061

NOTES: Original Lab # 45130

**ALL AMERICAN  
PIPELINE COMPANY**

September 8, 1995

Mr. Mark Ashley  
Environmental Geologist  
NM OIL CONSERVATION DIVISION  
ENVIRONMENTAL BUREAU  
2040 South Pacheco  
Santa Fe, NM 87505



Dear Mr. Ashley:

**SUBJECT: ANALYTICAL RESULTS ON ROCK COVER AT ALL AMERICAN  
PIPELINE COMPANY'S LORDSBURG STATION**

A composite sample of the rock cover at our Lordsburg Heater and Pump Station that appeared to be contaminated by the crude oil heater fire at the station during the early morning hours of August 3, 1995, was collected on August 21, 1995. The sample was placed in an air tight metal can and placed in a bed of cold packs to keep the sample cool during shipment. The sample was delivered to the laboratory in a cool state.

Attached are the results of the analyses performed by Zalco Laboratories of Bakersfield, California. Zalco Laboratories is certified by the state of California to perform hazardous waste and waste water analyses.

The analytical results indicate that the rock cover in the vicinity of the heater is not contaminated. Based on these results, we request that the Oil Conservation Division permit the All American Pipeline Company to continue using the rock cover in the vicinity of the heater fire in its current application without any remedial cleanup or use restrictions.

If you have any questions, please do not hesitate to call me, (805) 398-5345.

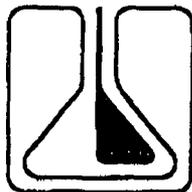
Sincerely,

Jordan R. Janak  
Director, Regulatory Compliance

JRJ:mes

Attachment

cc: Mr. Ray Smith, NM OCD (w/attachment)  
Mr. Dick Crumbliss, AAPL (w/attachment)



**ZALCO LABORATORIES, INC.**  
Analytical & Consulting Services

4309 Armour Avenue  
Bakersfield, California 93308

(805) 395-0539  
FAX (805) 395-3069

All American Pipeline Co.  
P O Box 40160  
Bakersfield, CA 93384-0160

Page 1 of 2  
Laboratory No: 45130  
Date Received: 8-23-95  
Date Reported: 9-7-95  
P O #: AA92-16678R

Attention: Jordan Janak

Sample: Beige Solid (type i)

Sample Description: Lordsburg Station Rock Cover  
Sampled by Dick Crumbliss on 8-21-95

CAM - Title 22 Chapter 30, Article 11

No Free Liquid

	TTLC/STLC	Total Concentration (TC) mg/kg	Extractable Concentration WET, (EC) mg/l	MRL TC/EC	Method/Reference
Antimony, Sb	500/15	< 10		10/0.2	6010/1
Arsenic, As	500/5.0	7.2		0.25/0.005	7061/1
Barium, Ba	10000/100	79		5.0/0.1	6010/1
Beryllium, Be	75/0.75	< 0.5		0.5/0.01	6010/1
Cadmium, Cd	100/1.0	2.1		0.5/0.01	6010/1
Chromium, Cr	2500/560	11		2.5/0.05	6010/1
Chromium, (VI)	500/5.0			0.05/0.05	6010/1
Cobalt, Co	8000/80	11		5.0/0.1	6010/1
Copper, Cu	2500/25	440	6.0	2.5/0.05	6010/1
Lead, Pb	1000/5.0	96	1.7 ✓	2.5/0.05	6010/1
Mercury, Hg	20/0.2	< 0.1		0.10/0.002	7471/1
Molybdenum, Mo	3500/350	31		5.0/0.1	6010/1
Nickel, Ni	2000/20	11		2.5/0.05	6010/1
Selenium, Se	100/1.0	< 0.25		0.25/0.005	7741/1
Silver, Ag	500/5.0	< 1.0		1.0/0.02	6010/1
Thallium, Tl	700/7.0	< 10		10/0.2	6010/1
Vanadium, V	2400/24	13		5.0/0.1	6010/1
Zinc, Zn	5000/250	1500		2.5/0.05	6010/1

TTLC - Total Threshold Limit Concentration, mg/kg  
 STLC - Soluble Threshold Limit Concentration, mg/l in extract  
 WET - Waste Extraction Test: pH 5.0 Solution, 0.2 M Citrate Buffer  
 Deionized water for Chromium (VI)

MRL = Minimum Reporting Level



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Page 2 of 2  
Laboratory No: 45130

<u>Organic Constituents</u>	<u>mg/kg</u>	<u>MRL</u>	<u>Method/Reference</u>
Petroleum Hydrocarbons, mg/kg	< 50	50	Sonicator, 418.1/2
Volatile Aromatic Hydrocarbons	<u>mg/kg</u>	0.005	8020/1
Benzene	< 0.005		
Toluene	0.007		
Ethyl Benzene	< 0.005		
Xylenes	< 0.005		

Date Analyzed: 8-24-95

MRL = Minimum Reporting Level

Method References:

1. EPA SW-846, 1986 3rd Edition
2. EPA 600/4-79-020 March 1983



Jim Etherton  
Lab Operations Manager

**ALL AMERICAN  
PIPELINE COMPANY**

August 10, 1995

OIL CONSERVATION DIVISION  
RECEIVED

1995 AUG 10 8 52

**FAX TRANSMITTAL**

Mr. Mark Ashley  
Environmental Geologist  
**NM Oil Conservation Division**  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

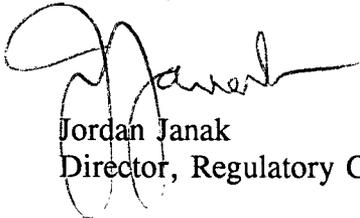
Dear Mr. Ashley:

**SUBJECT: ALL AMERICAN PIPELINE CO., LORDSBURG HEATER AND PUMP  
STATION FIRE 08/03/95 SUBSEQUENT NOTIFICATION REPORT**

Pursuant to the requirements of Rule 116 of the State of New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division Rules and Regulations, we are submitting the enclosed "Notification of Fire, Breaks, Spills, Leaks, and Blowouts" report for the fire at our Lordsburg Heater and Pump Station on August 3, 1995. We are also submitting a copy of the form to Mr. Ray Smith at the Artesia, District II office. At a later date we will submit the results of the laboratory tests conducted on the oil spray rock cover.

If you have any questions, please do not hesitate to contact me at (805) 398-5345.

Sincerely,



Jordan Janak  
Director, Regulatory Compliance REM

SS:mes

Enclosure: Notification of Fire Breaks, Spills, Leaks, and Blowouts  
Map of Lordsburg Heater and Pump Station  
Map of Location of Lordsburg Heater & Pump Station  
Copy of Letter to Mr. Ray Smith (District II Office)

cc: Mr. Ray Smith (District II Office)  
Billy Welch

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III  
1000 Rio Brazos Rd, Aztec, NM 87410

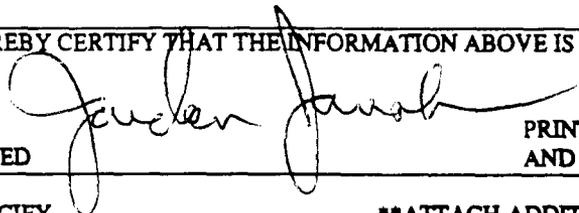
State of New Mexico  
Energy, Minerals and Natural Resources Department

**OIL CONSERVATION DIVISION**

P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO  
APPROPRIATE DISTRICT  
OFFICE IN ACCORDANCE  
WITH RULE 116 PRINTED  
ON BACK SIDE OF FORM

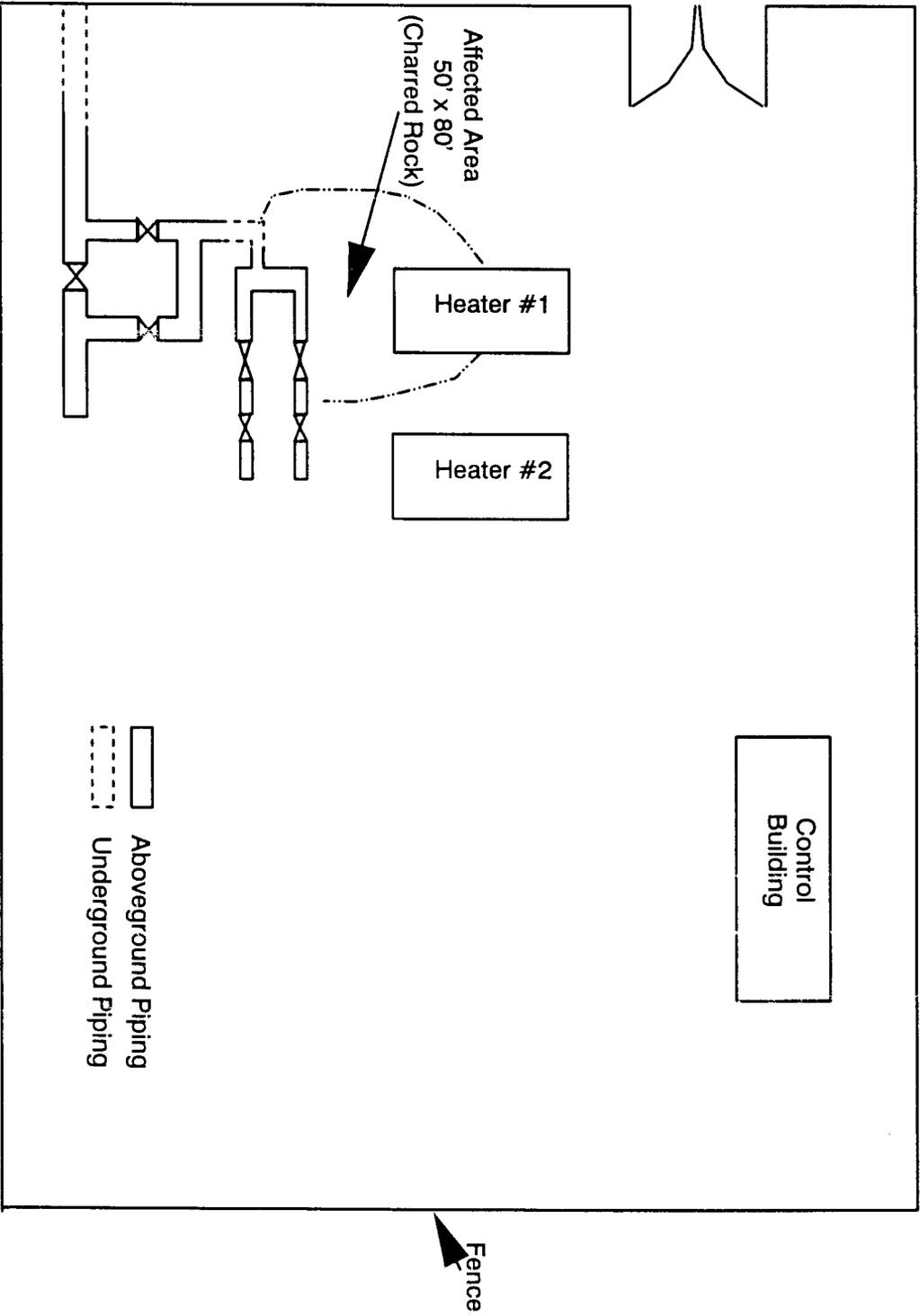
**NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS**

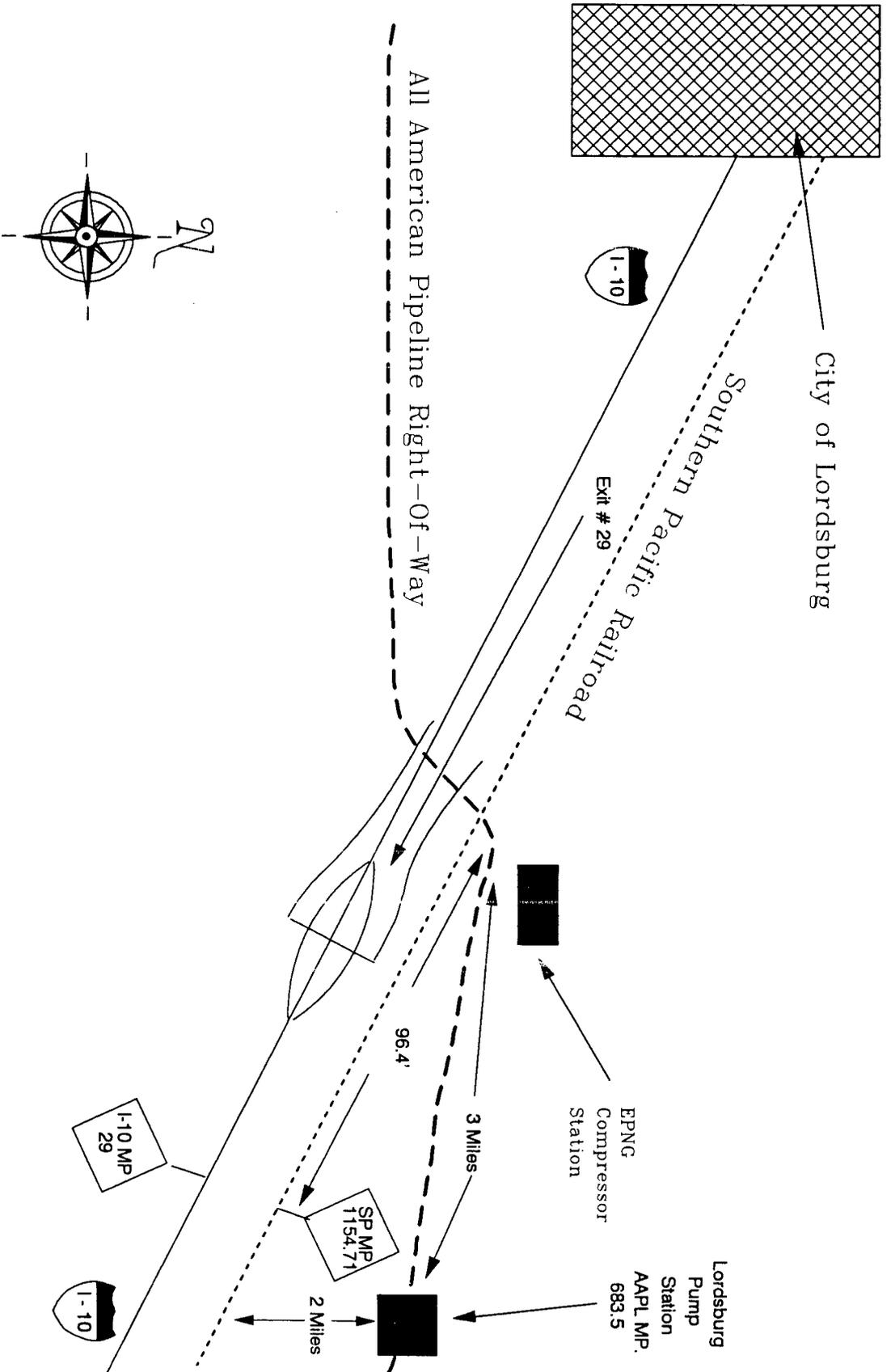
OPERATOR ALL AMERICAN PIPELINE CO.					ADDRESS 5500 Ming Ave., Ste. 300			TELEPHONE # 805-398-5345
REPORT OF	FIRE X	BREAK	SPILL	LEAK	BLOWOUT	OTHER*		
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE X	GASO PLNT	OIL RFY	OTHER*	
FACILITY NAME: Lordsburg Pump and Heater Station								
LOCATION OF FACILITY					SEC.	TWP.	RGE.	COUNTY
Qtr/Qtr Sec. or Footage NW1/4 NW1/4					13	23-S	17-W	Hidalgo
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK Nine miles East of Lordsburg, NM								
DATE AND HOUR OF OCCURRENCE 08/03/95; 04:50 (MDT)				DATE AND HOUR OF DISCOVERY 08/03/95; 04:50 (MDT)				
WAS IMMEDIATE NOTICE GIVEN?	YES X	NO	NOT RE-QUIRED	IF YES, TO WHOM Mr. Bryan Arrant				
BY WHOM Mike Joynor					DATE AND HOUR 08/03/95; 08:30 (MDT)			
TYPE OF FLUID LOST West Coast Heavy Crude Oil				QUANTITY OF LOSS 108 Bbls	VOLUME RE- COVERED All released consumed by fire.			
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY N/A					
IF YES, DESCRIBE FULLY**  N/A								
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN** A programmable logic controller (PLC) which controls the operation of the crude oil heater apparently malfunctioned causing an uncommanded start up of the isolated heater. Excessive heat caused a tube failure(s) which resulted in a fire. Remedial action to date: the gas supply valves to all heaters, not in service, have been closed. The investigation of this incident continues.								
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN** An area of approximately 50' x 80' in the vicinity of Heater #1 was charred and sprayed with oil (see attached sketch). The station has a rock ground cover. The rock which was charred and sprayed with oil in the 50' x 80' area will be removed and stock piled within the station. The soil below the rock ground cover was not affected.								
DESCRIPTION OF AREA	FARMING	GRAZING X	URBAN	OTHER*				
SURFACE CONDITIONS	SANDY X	SANDY LOAM	CLAY	ROCKY	WET	DRY X	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)** The incident occurred at 04:50 (MDT); the weather conditions at that time were clear skies, approximately 70° and a light southerly breeze.								
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF								
SIGNED				Jordan Janak Director, Regulatory Compliance			DATE 08-10-95	

\*SPECIFY

\*\*ATTACH ADDITIONAL SHEETS IF NECESSARY

# LORDSBURG HEATER AND PUMP STATION





**Location of Lordsburg Heater and Pump Station:**

Approximately 9 miles East of Lordsburg, New Mexico and  
 2 miles North of Interstate 10 (Mile Marker 33)

EXH 29

**ALL AMERICAN  
PIPELINE COMPANY**

August 10, 1995

**FAX TRANSMITTAL**

Mr. Ray Smith  
Deputy Oil & Gas Inspector  
NM Oil Conservation Division, District II  
811 South First Street  
Artesia, NM 88210

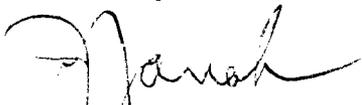
Dear Mr. Smith:

**SUBJECT: ALL AMERICAN PIPELINE CO., LORDSBURG HEATER AND PUMP  
STATION FIRE 08/03/95 SUBSEQUENT NOTIFICATION REPORT**

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If you have any questions, please do not hesitate to contact me at (805) 398-5345.

Sincerely,



Jordan Janak  
Director, Regulatory Compliance REM

SS:mes

Enclosures: Notification of Fire Breaks, Spills, Leaks, and Blowouts  
Map of Lordsburg Heater and Pump Station  
Map of Location of Lordsburg Heater & Pump Station  
Copy of Letter to Mr. Mark Ashley (Environmental Bureau Office)

cc: Mr. Mark Ashley (Environmental Bureau Office) ✓  
Billy Welch



**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

---

**CONSERVATION DIVISION**

2040 S. PACHECO  
SANTA FE, NM 87505

