

2R - 25

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

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TELEPHONE  
(505) 748-3311

EASYLINK  
62905278



## REFINING COMPANY

501 EAST MAIN STREET • P. O. BOX 159  
ARTESIA, NEW MEXICO 88211-0159

FAX  
(505) 746-6410 ACCTG  
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(505) 746-4438 P/L

July 8, 1997

RECEIVED  
JUL 10 1997

Mr. Roger Anderson  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

Dear Mr. Anderson:

As you are aware, Navajo Refining Company is in the process of cleaning up a crude oil leak from our gathering system in Section 29, Township 18S, Range 28E (Figure 1 & Figure 2). This leak is on the edge of an area that may occasionally collect excess rain water from a very small part of the surrounding land.

It is our opinion that the area in question does not warrant the protection afforded the "waters of the State" as defined in the **Standards for Interstate and Intrastate Streams**, effective January 23, 1995, because the contour of the surrounding land is very close to being flat with a slope of less than 50' per mile in all directions of the site (Figure 1 & Figure 3); The shallowness of the area in question also contributes to a high evaporation rate at the site. Any water that may occasionally accumulate would be very transitory and appears to do little more than supply ample moisture to the native grass and mesquite growing in the area. We understand that mesquites will not grow in standing water, therefore, the stand of mesquites in the area in question indicates the absence of standing water on a sustained basis.

Please rest assured that Navajo Refining Company is aware of the need to protect our surface and groundwater and accepts that responsibility. However, we feel that this end may be accomplished without deeming this area as a "water of the State" and allowing clean up of this site under the **"Guidelines for Remediation of Leaks, Spills and Releases"** *New Mexico Oil Conservation Division* - August 13, 1993 using the 5,000 ppm THP level for the soil cleanup. The nearest depth to groundwater is in excess of 100' from the bottom of the excavation. This fact is verified by the driller's log attached as Exhibit A. Also any water that may accumulate in this area is more likely to evaporate rather than travel to groundwater due to the low permeability of the

Mr. Roger Anderson  
NM OCD  
Page 2

soil (Exhibit B). The distance to the nearest water source on record with the New Mexico State Engineer's Office is excess of one (1) mile from the site. In Addition, the distance to the nearest perennial or intermittent stream or lake body of water is in excess of one (1) mile for the site according to the **USGS Artesia, Quadrangle New Mexico 1:100,000 Scale Series 1978** topographic map.

Assuming your concurrence with our assessment, we will proceed and file a work plan which will adequately protect any waters, surface or ground, that may be in the area. Thank you for your consideration in this matter. If I may be of further service, please contact me.

Sincerely,

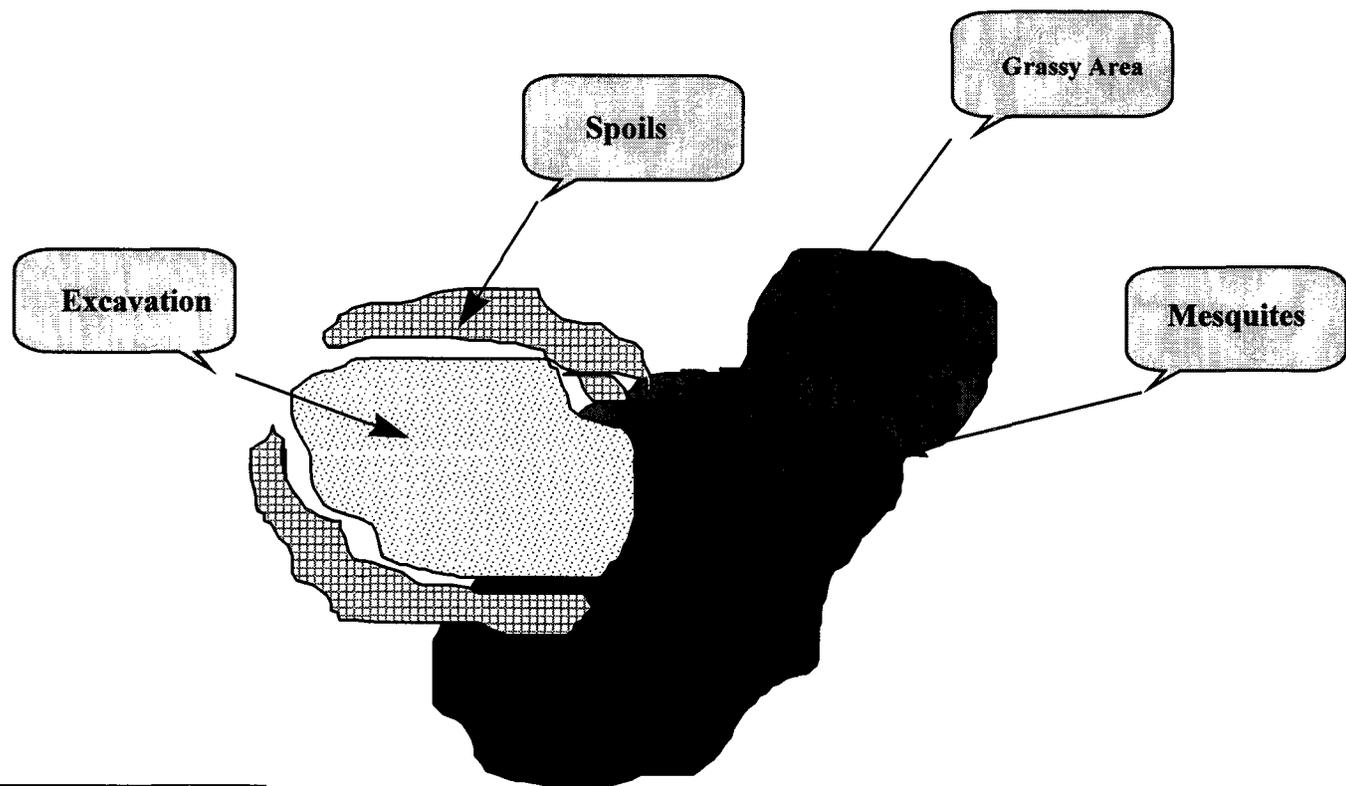


Darrell Moore  
Environmental Manager for  
Water and Waste

Enclosures

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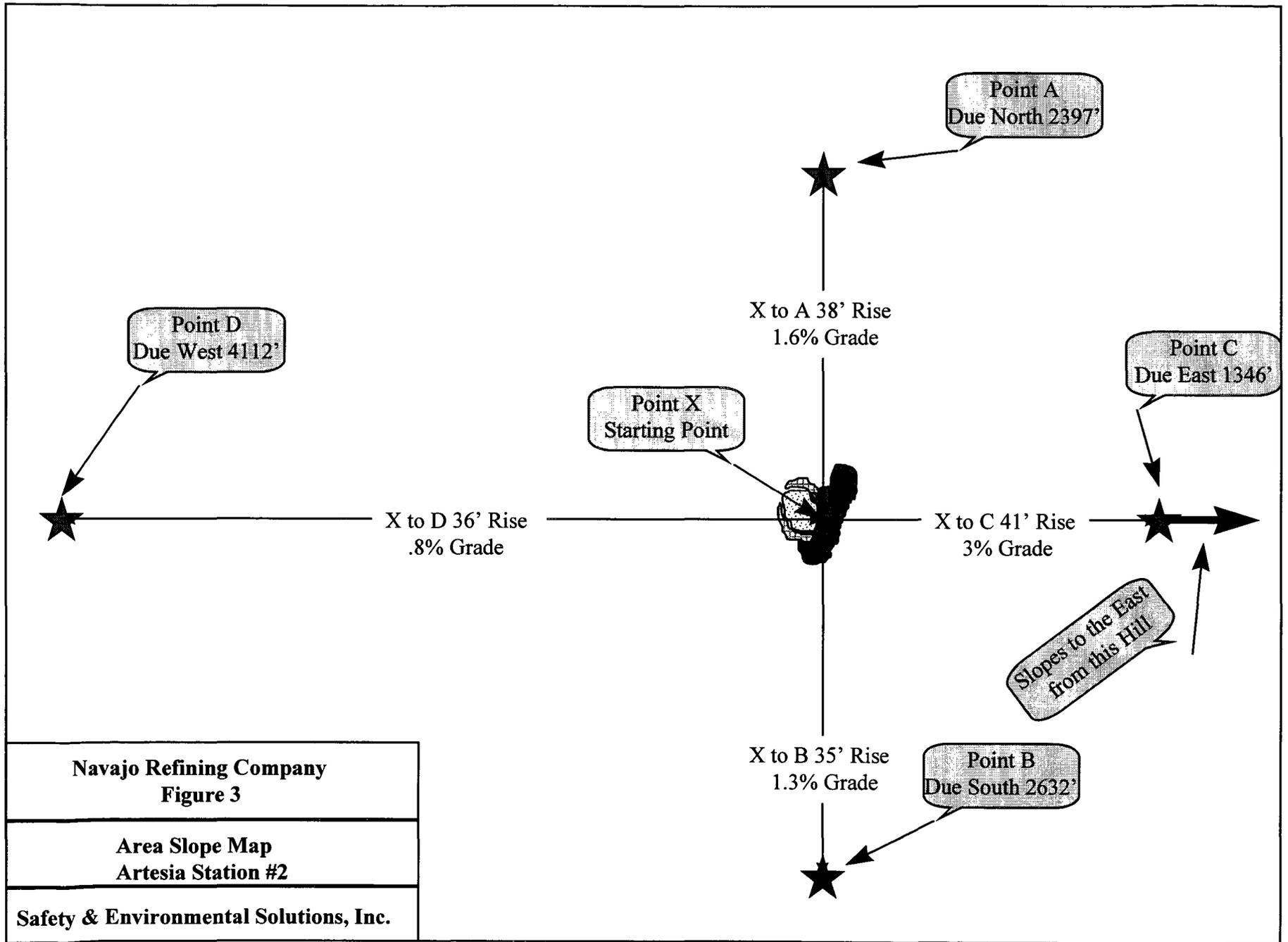




**Navajo Refining Company  
Figure 2**

**Site Map  
Artesia Station #2**

**Safety & Environmental Solutions, Inc.**



Navajo Refining Company  
Figure 3

Area Slope Map  
Artesia Station #2

Safety & Environmental Solutions, Inc.

Exhibit A  
Boring Log





# BORING LOG

PAGE 3 OF 4

DATE:  
5-29-97

DRILL START: 9:55 A.M.  
DRILL STOP: 1:00 P.M.

ATKINS ENGINEERING ASSOCIATES, INC

2904 West Second Street, Roswell, New Mexico 88202-3156

PROJECT NAME: Navajo Refining - Safety Environmental Solutions, Inc.  
Job #97202

SITE LOCATION: 15 Miles East of Artesia

BORING LOCATION: Artesia Station Discharge  
5 Miles South of Hwy

TH NUMBER: 2		AUGER TYPE: Hollow Stem		CASING ELEVATION: N/A		Well Construction Details	PID Reading	Lab Analysis	Lab Analysis			
Depth (Feet)	SAMPLE	Symbol	DRILLED BY: ATKINS ENGINEERING ASSOCIATES, INC.	LOGGED BY: Mort Bates	STRATUM DESCRIPTION							
65		[Dotted Pattern]	Clayey Sand w/Caliche Gravel, Tan, Firm, Dry to Damp									
66												
67												
68												
69												
70												
71												
72												
73												
74												
80		[Wavy Pattern]	Sandy Clay w/Sandstone, Red, Firm, Dry									
81												
82												
83												
84												
90												

# BORING LOG

PAGE 4 OF 4

DATE:  
5-29-97

DRILL START: 9:55 A.M.  
DRILL STOP: 1:00 P.M.

ATKINS ENGINEERING ASSOCIATES, INC

2904 West Second Street, Roswell, New Mexico 88202-3156

PROJECT NAME: Navajo Refining - Safety Environmental Solutions, Inc.  
Job #97202

SITE LOCATION: 15 Miles East of Artesia

BORING LOCATION: Artesia Station Discharge  
5 Miles South of Hwy

TH NUMBER: 2		AUGER TYPE: Hollow Stem		CASING ELEVATION: 3609.44		Well Construction Details	PID Reading	Lab Analysis	Lab Analysis
Depth (Feet)	SAMPLE	Symbol	DRILLED BY: ATKINS ENGINEERING ASSOCIATES, INC.	LOGGED BY: Mort Bates	STRATUM DESCRIPTION				
95			Sandy Clay w/Sandstone, Red, Firm, Dry						
100			Sandy Clay w/Sandstone, Red, Firm, Damp						
105			Sandy Clay w/Gravel, Red, Hard, Damp						
110			Sandy Clay w/Sandstone, Red, Firm, Damp						
115			Placed a 6 ft. bentonite plug at bottom of test hole, backfilled with cuttings to 4 ft. below land surface. Placed a 4 ft. grout plug to land surface.						
120			TD = 120 ft.						

Exhibit B  
Soil Permeability Data



TABLE 5.—Engineering

Soil series and map symbols	Suitability as a source of—		Degree of limitation for disposal fields for septic tanks and tile systems	Highway location	Dikes and levees
	Topsoil	Road fill			
Gypsum land: GA, SC, GR, Gs. (For Cottonwood part of GC and Gs, see Cottonwood series; for Reeves part of GR, see Reeves series.)	Poor: little or no soil.	Poor: gypsiferous material.	Severe: eroded material that may allow pollution of water supply.	Gypsiferous material; little or no soil.	Not applicable.
Harkey: Ha, Hk	Fair to good if fertilized.	Poor to fair.	Slight to moderate: moderate permeability.	Features favorable.	Features favorable.
Karro: KA, KL, Kr, Ku, Kv.	Fair in uppermost 10 inches if fertilized.	Fair.	Slight to moderate: moderate permeability.	Features favorable.	Features favorable.
Kermit: KM. (For Berino part of KM, see Berino series.)	Poor: drifting sand.	Good if soil binder is added.	Slight: drifting sand.	Loose sand hinders hauling; drifting sand; embankments highly erodible when exposed.	Not applicable.
Kimbrough: KO, KS, KT. (For Stegall part of KS and KT, see Stegall series.)	Fair in uppermost 9 inches.	Poor: surface is good, but hard caliche occurs below a depth of 9 inches.	Severe: fractured caliche at a depth below 9 inches; danger of pollution.	Hard caliche at a depth of 9 inches.	Hard caliche at a depth of 9 inches.
Largo: LA, LG, LN. (For Stony land part of LN, see Stony land.)	Poor to fair: moderately slow intake rate; erodible.	Poor.	Severe: the overflow phase is subject to flooding; moderate permeability.	Overflow phase is subject to periodic flooding; exposed embankments are highly erodible.	Unstable; level grade necessary.
Likes: LS.	Poor: sandy.	Very good.	Slight: gently sloping.	Loose sand hinders hauling; embankments are highly erodible.	Unstable; sandy material; level grade and soil binder are necessary.
Limestone rock land: LT.	Poor: rock outcrops.	Unsuitable.	Not applicable.	Limestone bedrock at or near the surface; slopes are more than 25 percent.	Not applicable.
Mobeetic: MO.	Poor: erodible.	Fair.	Slight: gently sloping.	Exposed embankments are highly erodible.	Unstable; subject to piping; level grade and protective soil binder are necessary.
Pajarito: PA, PD. (For Dune land part of PD, see Dune land.)	Poor: sandy.	Good to a depth of 3 feet; fair below 3 feet.	Slight: moderately rapid permeability.	Loose sand hinders hauling; drifting sand; exposed embankments are highly erodible.	Unstable; sandy material; level grade and protective soil binder are necessary.

See footnote at end of table.

interpretations—Continued

Farm ponds and embankments	Irrigation	Leveling and benching	Foundations for low buildings <sup>1</sup>	Pipelines	Hydrologic group
Not applicable.	Not applicable.	Not applicable.	Poor shear strength and bearing capacity.	Special treatment needed for gypsum salts; varying hardness of gypsiferous rocks.	C
Features favorable.	If cultivated, the sandy loam type is susceptible to wind erosion.	If cultivated, the sandy loam type is susceptible to wind erosion.	Fair bearing capacity and shear strength.	Features favorable.	B
Features favorable.	Susceptible to crusting; high lime content.	Features favorable.	Moderate bearing capacity.	Special treatment needed for gypsum salts generally below a depth of 3 feet.	B
Not applicable.	Not applicable.	Not applicable.	Good suitability if soil is confined.	Subject to blowouts.	A
Not applicable.	Not applicable.	Not applicable.	Good suitability; hard caliche at a depth of 9 inches.	Hard caliche at a depth of 9 inches.	D
Unstable; good for core material.	Susceptible to water erosion.	Overflow phase is susceptible to periodic flooding.	Fair to poor bearing capacity and shear strength; low to high shrink-swell potential; overflow phase is susceptible to periodic flooding.	Features favorable.	C
Not applicable.	Rapid intake rate; sprinkler system needed; susceptible to wind erosion.	Susceptible to wind erosion.	Good suitability if confined.	Features favorable.	A
Not applicable.	Not applicable.	Not applicable.	Good suitability; blasting required for excavations.	Limestone bedrock at or near the surface; steep.	D
Moderately pervious; susceptible to piping.	Rapid intake rate; sprinkler system needed; susceptible to wind erosion.	Not applicable.	Features favorable.	Features favorable.	B
Not applicable.	Rapid intake rate; sprinkler system needed; dune topography; susceptible to wind erosion.	Very sandy; susceptible to soil blowing.	Good suitability if confined.	Features favorable.	A

SITE

TABLE 4.—Estimated properties

[Properties are not estimated for Dune land, Limestone rock land, Rock land, Stony and Rough

Soil series and map symbols	Depth to bedrock, hard caliche, or gypsum	Depth from surface	Classification		
			USDA texture	Unified	AASHO
Active dune land: AD.....	More than 60.	0-60	Fine sand.....	SP	A-3
Anthony: AE, Aa, Ah.....	More than 60.	0-60	Stratified sandy loam and loamy sand.	SM	A-1 or A-2
Arroyo: AH, Ak, An..... (For Harkey part of AH and Ak, see Harkey series.)	More than 60.	0-14 14-60	Silty clay loam..... Silty clay.....	CL CH	A-6 A-7
Atoka: Ao, At.....	20 to 36.	0-8 8-33 33	Loam..... Loam and light clay loam..... Hard, fractured caliche.	ML CL	A-4 A-6
Berino: BA, BB, BD, BP..... (For Pajarito part of BP, see Pajarito series; the Dune land part of BD is too variable for reliable evaluation.)	More than 60.	0-17 17-50	Loamy fine sand and fine sand..... Sandy clay loam.....	SM SC	A-2 A-6
Bippus.....	More than 60.	0-48 48	Silty clay loam and clay loam..... Weakly cemented caliche.	CL	A-6
Cacique: CA.....	12 to 36.	0-17 17-24 24	Loamy sand and sandy loam..... Sandy clay loam..... Indurated, fractured caliche.	SM SC	A-2 A-6
Cottonwood: CR..... (For Reeves part of CR, see Reeves series.)	Soft to hard gypsum below a depth of 9 inches.	0-9 9	Loam..... Gypsum.	ML-CL	A-4
Dey: DP..... (For Pima part of DP, see Pima series.)	More than 60.	0-15 15-60	Gravelly loam..... Very gravelly loam.....	GM GP	A-1 or A-2 A-1
Ector: EC, EF, ER..... (For Reagan part of ER, see Reagan series.)	1 to 18.	0-6 6	Stony loam..... Limestone bedrock.	SM-ML	A-4
Gypsum land: GA, GC, GR, Gs..... (For Cottonwood part of GC and Gs, see Cottonwood series; for Reeves part of GR, see Reeves series.)	Soft or hard gypsum at a depth of 0 to 10 inches.	0-19 19	Gypsiferous earth..... Gypsum.	ML	A-4
Harkey: Ha, Hk.....	More than 60.	0-87	Very fine sandy loam, loam, and silt loam.	ML	A-4
Karoo: KA, KL, Kr, Ku, Kv.....	More than 60.	0-20 24-60	Loam..... Clay loam.....	ML-CL CL	A-4 A-6
Kermit: KM..... (For Berino part of KM, see Berino series.)	More than 60.	0-60	Fine sand.....	SP-SM	A-3
Lambrough: KO, KS, KT..... (For Stegall part of KS and KT, see Stegall series.)	2 to 15.	0-9 9	Loam..... Caliche.	ML	A-4
Lan..... (and part of LN is too variable for reliable evaluation.)	More than 60.	0-65	Stratified loam and silt loam.....	ML-CL	A-4
Lukes: LS.....	More than 60.	0-60	Loamy fine sand.....	SM	A-1
Mobestie: MO.....	More than 60.	0-60	Fine sandy loam.....	SM	A-4

and characteristics

broken land, and Stony land, because the soil material is too variable for reliable evaluation]

Percentage passing sieve—			Permeability	Available water capacity	Reaction	Electrical conductivity (Mc × 10 <sup>3</sup> ) Mmho./cm. at 25° C.	Corrosivity (Untreated steel pipe)	Shrink-swell potential
No. 4 (1.7 mm.)	No. 10 (2.0 mm.)	No. 200 (0.074 mm.)						
100	100	0-5	Inches per hour >10.0	Inches per inch of soil 0.06-0.08	pH 6.6-7.3	0-1.0	Low.....	Low.
100	100	15-25	2.5-5.0	0.10-0.12	7.4-7.8	0-1.0	Low.....	Low.
100	100	90-95	0.05-0.20	0.18-0.20	7.9-8.4	4.0-8.0	High.....	Moderate.
100	100	90-95	0.05-0.20	0.15-0.17	7.9-8.4	8.0-12.0	High.....	High.
100	100	60-75	0.8-2.5	0.16-0.18	7.4-7.8	0-2.0	Moderate.....	Low to moderate.
100	100	70-80	0.8-2.5	0.17-0.19	7.4-7.8	0-2.0	Moderate.....	Moderate.
100	100	10-20	5.0-10.0	0.06-0.08	6.6-7.3	0-1.0	Low.....	Low.
100	100	35-45	0.2-0.8	0.14-0.16	6.6-7.3	0-4.0	Moderate.....	Moderate.
100	100	85-95	0.2-0.8	0.18-0.20	7.4-8.4	0-4.0	Moderate.....	Moderate.
100	100	20-35 35-50	5.0-10.0 0.8-2.5	0.10-0.12 0.14-0.16	6.6-7.3 6.6-7.3	0-1.0 0-4.0	Low..... Moderate.....	Low. Moderate.
100	100	60-75	0.8-2.5	0.16-0.18	6.6-7.8	8.0-15.0	High.....	Low to moderate.
35-75 15-45	30-70 10-40	15-20 5-10	0.8-2.5 >10.0	0.11-0.13 0.06-0.08	7.4-7.8	0-2.0 0-1.0	Moderate..... Low.....	Low. Low.
55-85	50-80	40-60	0.8-2.5	0.11-0.13	7.4-7.8	0-4.0	Moderate.....	Low.
100	100	60-70	0.8-2.5	0.16-0.18	6.6-7.8	>15.0	High.....	Low.
100	100	60-75	0.8-2.5	0.17-0.19	7.4-7.8	2.0-12.0	Moderate to high.	Low.
100	100	60-75 70-80	0.8-2.5 0.8-2.5	0.16-0.18 0.18-0.20	7.9-8.4 7.9-8.4	4.0-10.0 8.0-15.0	High..... High.....	Moderate. Moderate.
100	100	5-10	>10.0	0.06-0.08	6.6-7.3	0-1.0	Low.....	Low.
95-100	90-95	50-65	0.8-2.5	0.16-0.18	6.6-7.8	0-4.0	Moderate.....	Low.
100	100	60-70	0.8-2.5	0.17-0.19	7.4-7.8	0-4.0	Moderate.....	Low to moderate.
98	97	10-20	5-10.0	0.08-0.10	6.6-7.8	0-1.0	Low.....	Low.
100	100	40-50	2.5-5.0	0.13-0.15	7.4-8.4	0-1.0	Low.....	Low.

SITE

length, molding. Also caliche, and in un- and soils and resi- cossion sub- phs, orts the ful hey at vy ers is nd ex- a ng as of re or

The three columns under the heading "Classification" show soil texture as it is classified both by soil scientists and by engineers.

The estimated percentages of soil material passing sieves No. 4, No. 10, and No. 200 reflect the normal range for the series. As the grain-size distribution of any soil varies considerably, it should not be assumed that the range shown in the table will be applicable to all samples of a specified soil, nor that the engineering classification will invariably be as shown.

The rates of permeability given in table 4 are based on the movement of water through the soil in its undisturbed state. They were estimated by comparison with soils of known permeability. Permeability is expressed in terms of inches per hour.

Available moisture capacity, measured in inches per inch of soil depth, is the approximate amount of capillary water in the soil available for plant growth after all free water has drained away.

Reaction refers to the degree of acidity or alkalinity of a soil, expressed in pH values. A soil having a pH value of 7 is neutral in reaction. The pH value gives an indication of the corrosiveness of the soils and the protection needed for pipelines and other engineering structures.

Salinity affects not only the suitability of a soil for crops, but also its stability when used as a construction material and its corrosiveness to other materials. Estimates of salinity are based on estimates of electrical conductivity of saturated soil extract.

Shrink-swell potential is an indication of the volume change to be expected when the moisture content of soil material changes. In general, soils that have a high shrink-swell potential present hazards to the maintenance of engineering structures.

Some of the nearby level to gently sloping soils of the Arno, Cottonwood, Harkey, Reeves, and Pima series have a seasonal high water table. In some areas of these soils, the water table fluctuates between depths of about 1 foot and 3 feet during the irrigation season or in years when rainfall is above normal.

Periodic flooding occurs in swales and on the lower parts of flood plains of soils of the Arno, Bippus, Cottonwood, Dev, Harkey, Largo, Reeves, and Stegall series. On soils other than those of the Arno, Pima, and Reeves series, floodwaters seldom stand more than a few hours. Flooded areas of these soils are sometimes under water 1 or 2 days, but serious damage is infrequent.

#### Engineering interpretations

Table 5 gives estimates of the suitability of the soils for specified uses and lists soil properties that might present hazards for such use. Generally, the soils of the Eddy Area are not suitable as sources of sand and gravel, but some areas of Dev and Ector soils yield gravelly material suitable for crushing. Grassed or sodded waterways are not common in this Area, because rainfall is too low to maintain a good plant cover and use of irrigation water for this purpose is not economical.

The ratings of the soils as a source of topsoil are based on use of the soil as topdressing on road slopes and dams.

A good rating is given to a soil, such as Reagan loam, that is fertile and tillable and generally not subject to erosion.

The suitability of a soil for road fill depends largely on the texture of the material and on its natural water content. Compaction characteristics, erodibility, depth to bedrock, and presence of coarse fragments within the normal depth of road excavation are features that should be considered. Highly plastic soil material with high natural water content is rated as poor. Soils that have a high proportion of silt and fine sand are rated poor to fair because they are difficult to compact, slow to revegetate, and easily eroded on steep embankments.

Suitability of the soils for disposal fields for septic tanks and tile systems is shown in the table in terms of the degree of limitation for such use. A rating of slight indicates no unfavorable features. Characteristics and qualities considered are permeability, ground-water level, slope, overflow hazard, depth to impervious material, and the possibility of polluting the water supply.

The entire profile was evaluated in making recommendations of the soils for use as highway locations. The ratings are for undisturbed soil without artificial drainage. It was assumed that the surface soil would be removed in construction for use as topsoil wherever feasible. Significant factors considered are the content of organic matter, salts, stones, and rock outcrops; the depth to hard rock or caliche; the suitability of the soil for embankments; the stability of the soil and the ease of handling; the hazards of flooding and erosion; the plasticity of the soils; and topography. Frost heave was not considered, because the soils seldom freeze.

Significant factors considered in rating the soils for use in constructing dikes and levees are stability of the soils when wet and their workability when used in construction.

The characteristics of the soils that affect suitability for constructing farm ponds and irrigation reservoirs are the amount of seepage to be expected and the depth to an inhibiting layer, such as bedrock, caliche, or gypsiferous material. The characteristics and qualities considered in determining suitability of the soils for embankments are the same as those for dikes and levees.

The factors that affect irrigation are depth of tillable soil, texture, intake rate, permeability, water-holding capacity, soil reaction, and topography. The availability of suitable irrigation water is not considered. The characteristics and qualities considered in determining suitability of the soils for leveling and benching are the same as those for irrigation.

The properties considered in rating the soils as to their suitability for building foundations are bearing capacity, shrink-swell potential, and shear strength.

The ratings of suitability of the soils for pipelines is based mainly on soil depth and rockiness and on the content of salts.

The soils are classified in the table according to their hydrologic group. These are groups of soils having similar rates of infiltration by water, even when wetted, and similar rates of water transmission within the soil. There are four hydrologic groups:

GROUP A consists of soils that have a high infiltration rate even when thoroughly wetted, chiefly deep, well-drained to excessively drained sand, gravel, or both. These soils have a high rate of water transmission and a low runoff potential.

GROUP B consists of soils that have a moderate infiltration rate when thoroughly wetted and that are chiefly moderately deep to deep, moderately well drained to well drained, and moderately fine textured to moderately coarse textured. These soils have a moderate rate of water transmission.

GROUP C consists of soils that have a slow rate of infiltration when thoroughly wetted, chiefly soils that have a layer that impedes downward movement of water and soils that are moderately fine textured to fine textured. These soils have a slow rate of transmission.

GROUP D consists of soils that have a very slow rate of infiltration when thoroughly wetted, chiefly clay soils that have a high swelling potential, soils that have a permanently high water table, soils that have a claypan or clay layer at or near the surface, and shallow soils over nearly impervious materials. These soils have a very slow rate of water transmission.

SITE

#### Engineering test data

Table 6 gives data obtained by laboratory testing of samples of selected soils of the Area. The soils tested were sampled at several locations. The engineering characteristics of a soil at a specific location are indicated by these test data, but variations in properties can be expected at other locations. Even for those soils sampled in more than one location, the test data probably do not show the maximum range in characteristics that affect engineering.

#### Engineering classification systems

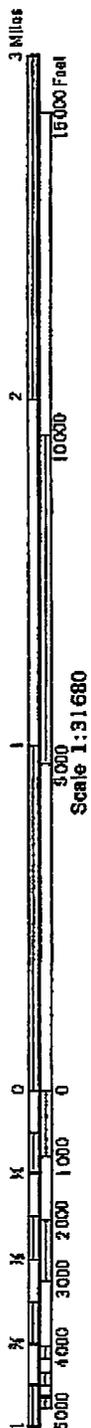
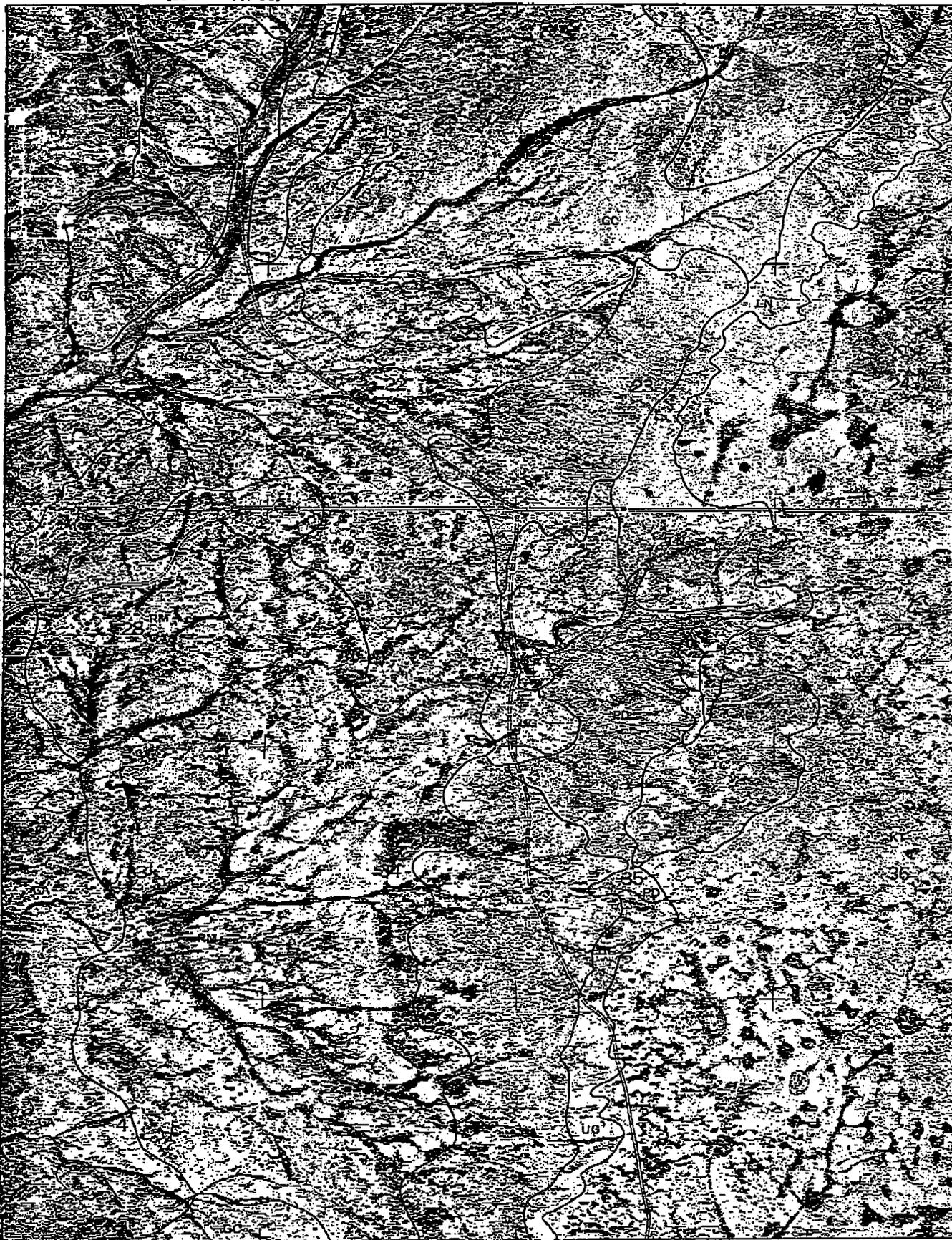
Two systems of classifying soils for engineering purposes are in general use. Classification of the soils of the Eddy Area according to both of these systems is given in this survey.

The Unified system of soil classification was developed by the Waterways Experiment Station, Corps of Engineers (15). In this system, soil classification is based on the identification of soils according to texture and plasticity and their performance as construction material. In the Unified system SW and SP are clean sands, SM and SC are sands with fines of silt and clay, ML and CL are silts and clays with low liquid limit, and MH and CH are silts and clays with high liquid limit. If soils are on the borderline between two classifications, a joint classification symbol is used, for example, ML-CL.

The system used by the American Association of State Highway Officials (AASHO) (2) is based on field performance of soils in highways. In this system, soil materials are classified into seven principal groups, designated A-1 through A-7. The best materials for use in highway subgrades (gravelly soils of high bearing capacity) are classified as A-1, and the poorest (clayey soils having low strength when wet) are classified A-7. The relative engineering values of the soils within each group are indicated by group index numbers. Group indexes range from 0 for the best material to 20 for the poorest.

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(Joins sheet 55)



(Joins sheet 63)

NAT. REFUGES

(Joins sheet 73)