

2R - 36

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2007 - 1992

**Price, Wayne, EMNRD**

---

**From:** Campbell, Larry [Larry.Campbell@SUG.com]

**Sent:** Friday, January 26, 2007 1:49 PM

**To:** "wayne.price."@state.nm.us

**Subject:** Legals for Atoka No. 3

Wayne, the legal description for Atoka No. 3 compressor station is as follows:

32-43-15      104-20-45

T.18S, R.26E    NE ¼ of section 14, Eddy County NM

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## Transwestern Pipeline Company

TECHNICAL OPERATIONS

P. O. Box 1717 • Roswell, New Mexico 88202-1717

Phone (505) 623-2761

FAX (505) 625-8060

OIL CONSER.

ON DIVISION

REF. JED

1992 JAN 23 AM 8 58

January 17, 1992

Mr. Roger Anderson  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

Dear Mr. Anderson:

Transwestern Pipeline Company requests from the Oil Conservation Division (OCD) approval to formally close a concrete lined waste pit which is located at the Atoka No.3 Compressor Station. This remote facility operates in the exemption area and is located at the following coordinates:

NE 1/4 of section 14, Township 18 South, Range 26 East  
Eddy County, New Mexico

The concrete lining of this pit has been removed and is presently piled at the facility. Soil remediation, which was initiated in November, 1991, has presently resulted in approximately 500 cubic yards of nonhazardous hydrocarbon contaminated soils to be removed from the approximate 30'x 30'x 15' excavation. Attached with this letter are the analytical results for two (2) soil samples taken in the pit bottom for total petroleum hydrocarbons (TPH) to confirm that all soil contamination underlying the concrete pit has been removed. Additionally, a TCLP analyses was run on these samples to verify that the contaminated soils were nonhazardous. It is the intent to place this hydrocarbon contaminated material in the OCD approved Yates Landfarm for bioremediation.

Transwestern Pipeline Company is also requesting that the OCD grant approval to dispose of the concrete pit back into the pit excavation hole. This concrete material has been broken into various sizes. A report presenting the TPH concentration for the concrete is attached.

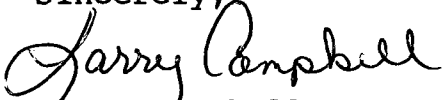
Because the TPH concentrations of the concrete exceed the 100 Mg/Kg action level, Transwestern proposes to perform the following remedial actions to dispose of the concrete onsite:

- 1) The concrete will be placed in the bottom of the pit excavation and covered with clean fill material to approximately 6 inches above the in-place concrete.
- 2) 2-5 mil pieces of polyethylene plastic will be placed over the concrete and soil which has been placed in the pit.

- 3) Clean fill material will be placed into the pit and packed to approximate natural ground level elevations. A 6 inch mounded cap of clean fill will then be constructed over the backfilled pit.
- 4) Approximately 4 inches of soil cement will be applied over the mound to act as a barrier for vertical migration of any moisture.

If you should require any additional information concerning closure of this pit, contact me at 625-8022.

Sincerely,

A handwritten signature in cursive script that reads "Larry Campbell".

Larry Campbell  
Compliance Environmentalist

xc: Bill Nolan  
Rich Jolly  
Doc Alpers

Assaigai Analytical Labs  
7300 Jefferson NE  
Albuquerque, NM 87109

Attn: SYED RIZVI  
Phone: (505)345-8964

ENRON/TRANSWESTERN PIPELINE  
6381 N. MAIN STREET  
P.O. BOX 1717  
ROSWELL, NM 88202-1717  
Attn: LARRY CAMPBELL  
Invoice Number: 912938

Order #: 91-12-116  
Date: 12/20/91 16:01  
Work ID: YATES PIT  
Date Received: 12/12/91  
Date Completed: 12/20/91

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SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
03	A3008 PIT ATOKA 3

<u>Sample Number</u>	<u>Sample Description</u>
02	A3007 PIT ATOKA SOUTH

QUESTIONS ABOUT THIS REPORT SHOULD BE ADDRESSED TO:  
LABORATORY OPERATIONS MANAGER/ASSAIGAI ANALYTICAL  
7300 JEFFERSON N.E., ALBUQUERQUE, N.M. 87109

Syed Rizvi  
Certified By  
SYED N. RIZVI



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Sample: 02A A3007 PIT ATOKA SOUTH

Collected:

<u>Test Description</u>	<u>Result</u>	<u>Limit</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
BENZENE, TOLUENE, EBENZ, XYLE					
BENZENE	<0.1	0.1	MG/KG	12/17/91	SS
TOLUENE	<0.1	0.1	MG/KG	12/17/91	SS
ETHYL BENZENE	<0.1	0.1	MG/KG	12/17/91	SS
XYLENES	<0.1	0.1	MG/KG	12/17/91	SS
TCLP F SERIES ENRON LIST#2					
METHYLENE CHLORIDE	<0.02	0.02	MG/L	12/17/91	DD
1,1,1-TRICHLOROETHANE	<0.02	0.02	MG/L	12/17/91	DD
TRICHLORO-TRIFLUOROETHANE	<0.02	0.02	MG/L	12/17/91	DD



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Test Description	Result	Limit	Units	Analyzed	By
ORTHO-DICHLOROBENZENE	<0.02	0.02	MG/L	12/17/91	DD
TRICHLOROFLUOROMETHANE	<0.02	0.02	MG/L	12/17/91	DD
XYLENE	<0.02	0.02	MG/L	12/17/91	DD
ACETONE	<10	10	MG/L	12/17/91	DD
ETHYL ACETATE	<10	10	MG/L	12/17/91	DD
ETHYL BENZENE	<0.02	0.02	MG/L	12/17/91	DD
ETHYL ETHER	<0.02	0.02	MG/L	12/17/91	DD
METHYL ISOBUTYL KETONE	<0.02	0.02	MG/L	12/17/91	DD
n-BUTYL ALCOHOL	<10	10	MG/L	12/17/91	DD
CYCLOHEXANONE	<0.02	0.02	MG/L	12/17/91	DD
METHANOL	<10	10	MG/L	12/17/91	DD
TOLUENE	<0.02	0.02	MG/L	12/17/91	DD
ISOBUTANOL	<10	10	MG/L	12/17/91	DD
Surrogates					
4-BROMOFLUOROBENZENE	88	Min: 86	Max: 115		
1,2-DICHLOROETHANE-d4	70 Q	Min: 76	Max: 114		
TOLUENE-d8	112 Q	Min: 88	Max: 110		
TCLP METALS					
ARSENIC	0.006	0.005	MG/L		BC
BARIUM	<0.50	0.50	MG/L		BC
CADMIUM	0.031	0.003	MG/L		BC
CHROMIUM	0.05	0.02	MG/L		BC
LEAD	0.29	0.10	MG/L		BC
MERCURY	<0.0002	0.0002	MG/L		BC
SELENIUM	<0.005	0.005	MG/L		BC
SILVER	0.020	0.010	MG/L		BC
TCLP ORGANICS ENRON LIST#2					
BENZENE	<0.02	0.02	MG/L	12/19/91	DD



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<u>Test Description</u>	<u>Result</u>	<u>Limit</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
CARBON TETRACHLORIDE	<0.02	0.02	MG/L	12/19/91	DD
CHLOROBENZENE	<0.02	0.02	MG/L	12/19/91	DD
PYRIDINE	<0.001	0.001	MG/L	12/19/91	DD
1,2-DICHLOROETHANE	<0.02	0.02	MG/L	12/19/91	DD
1,1-DICHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
METHYL ETHYL KETONE	<0.02	0.02	MG/L	12/19/91	DD
TETRACHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
TRICHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
VINYL CHLORIDE	<0.02	0.02	MG/L	12/19/91	DD
O-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
M-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
P-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
1,4-DICHLOROBENZENE	<0.001	0.001	MG/L	12/19/91	DD
2,4,5-TRICHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
HEXACHLOROBENZENE	<0.001	0.001	MG/L	12/19/91	DD
HEXACHLORO-1,3-BUTADIENE	<0.001	0.001	MG/L	12/19/91	DD
HEXACHLOROETHANE	<0.001	0.001	MG/L	12/19/91	DD
2,4,6-TRICHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
PENTACHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
<b>Surrogates</b>					
NITROBENZENE-d5	96	Min: 35	Max: 114		
2-FLUOROBIPHENYL	50	Min: 43	Max: 116		
TERPHENYL-d14	86	Min: 33	Max: 141		
PHENOL-d5	75	Min: 10	Max: 94		
2-FLUOROPHENOL	87	Min: 21	Max: 100		
TOTAL REC PET HYDROCARBONS	<5.0	5.0	MG/KG	12/13/91	PV





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12/20/91 16:01

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Sample: 03A A3008 PIT ATOKA

Collected:

<u>Test Description</u>	<u>Result</u>	<u>Limit</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
BENZENE, TOLUENE, EBENZ, XYLE					
BENZENE	<0.1	0.1	MG/KG	12/17/91	SS
TOLUENE	<0.1	0.1	MG/KG	12/17/91	SS
ETHYL BENZENE	<0.1	0.1	MG/KG	12/17/91	SS
XYLENES	<0.1	0.1	MG/KG	12/17/91	SS
TCLP F SERIES ENRON LIST#2					
METHYLENE CHLORIDE	<0.02	0.02	MG/L	12/17/91	DD
1,1,1-TRICHLOROETHANE	<0.02	0.02	MG/L	12/17/91	DD
TRICHLORO-TRIFLUOROETHANE	<0.02	0.02	MG/L	12/17/91	DD
ORTHO-DICHLOROBENZENE	<0.02	0.02	MG/L	12/17/91	DD
TRICHLOROFLUOROMETHANE	<0.02	0.02	MG/L	12/17/91	DD
XYLENE	<0.02	0.02	MG/L	12/17/91	DD
ACETONE	<10	10	MG/L	12/17/91	DD
ETHYL ACETATE	<10	10	MG/L	12/17/91	DD
ETHYL BENZENE	<0.02	0.02	MG/L	12/17/91	DD
ETHYL ETHER	<0.02	0.02	MG/L	12/17/91	DD
METHYL ISOBUTYL KETONE	<0.02	0.02	MG/L	12/17/91	DD
n-BUTYL ALCOHOL	<10	10	MG/L	12/17/91	DD
CYCLOHEXANONE	<0.02	0.02	MG/L	12/17/91	DD
METHANOL	<10	10	MG/L	12/17/91	DD
TOLUENE	<0.02	0.02	MG/L	12/17/91	DD
ISOBUTANOL	<10	10	MG/L	12/17/91	DD
Surrogates					
4-BROMOFLUOROBENZENE	87	Min: 86		Max: 115	
1,2-DICHLOROETHANE-d4	73 Q	Min: 76		Max: 114	



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Order # 91-12-116  
2/20/91 16:01

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<u>Test Description</u>	<u>Result</u>	<u>Limit</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
TOLUENE-d8	113 Q	Min: 88	Max: 110		
TCLP METALS					
ARSENIC	0.005	0.005	MG/L		BC
BARIUM	<0.50	0.50	MG/L		BC
CADMIUM	0.033	0.003	MG/L		BC
CHROMIUM	0.04	0.02	MG/L		BC
LEAD	0.32	0.10	MG/L		BC
MERCURY	<0.0002	0.0002	MG/L		BC
SELENIUM	<0.005	0.005	MG/L		BC
SILVER	0.020	0.010	MG/L		BC
TCLP ORGANICS ENRON LIST#2					
BENZENE	<0.02	0.02	MG/L	12/19/91	DD
CARBON TETRACHLORIDE	<0.02	0.02	MG/L	12/19/91	DD
CHLOROBENZENE	<0.02	0.02	MG/L	12/19/91	DD
PYRIDINE	<0.001	0.001	MG/L	12/19/91	DD
1,2-DICHLOROETHANE	<0.02	0.02	MG/L	12/19/91	DD
1,1-DICHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
METHYL ETHYL KETONE	<0.02	0.02	MG/L	12/19/91	DD
TETRACHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
TRICHLOROETHYLENE	<0.02	0.02	MG/L	12/19/91	DD
VINYL CHLORIDE	<0.02	0.02	MG/L	12/19/91	DD
O-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
M-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
P-CRESOL	<0.001	0.001	MG/L	12/19/91	DD
1,4-DICHLOROBENZENE	<0.001	0.001	MG/L	12/19/91	DD
2,4,5-TRICHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
HEXACHLOROBENZENE	<0.001	0.001	MG/L	12/19/91	DD
HEXACHLORO-1,3-BUTADIENE	<0.001	0.001	MG/L	12/19/91	DD



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Order # 91-12-116  
12/20/91 16:01

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<u>Test Description</u>	<u>Result</u>	<u>Limit</u>	<u>Units</u>	<u>Analyzed</u>	<u>By</u>
HEXACHLOROETHANE	<0.001	0.001	MG/L	12/19/91	DD
2,4,6-TRICHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
PENTACHLOROPHENOL	<0.001	0.001	MG/L	12/19/91	DD
Surrogates					
NITROBENZENE-d5	122 Q	Min: 35	Max: 114		
2-FLUOROBIPHENYL	70	Min: 43	Max: 116		
TERPHENYL-d14	72	Min: 33	Max: 141		
PHENOL-d5	71	Min: 10	Max: 94		
2-FLUOROPHENOL	97	Min: 21	Max: 100		
TOTAL REC PET HYDROCARBONS	<5.0	5.0	MG/KG	12/13/91	PV



Order # 91-12-116  
12/20/91 16:01

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## TEST METHODOLOGIES

TCLP METALS: USEPA 200 SERIES METHODOLOGY

TCLP EXTRACTION: USEPA METHOD # 1311

BENZENE, TOLUENE, ETHYLBENZENE, XYLENES: USEPA METHOD # 602/8020

TCLP ZERO HEAD SPACE EXTRACTION = USEPA METHOD # 1311

TOTAL RECOVERABLE PETROLEUM HYDROCARBONS = USEPA METHOD # 418.1

# ASSAIGAI

ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109

Assaigai Analytical Labs  
7300 Jefferson NE  
Albuquerque, NM 87109

Attn: SYED RIZVI  
Phone: (505) 345-8964

ENRON/TRANSWESTERN PIPELINE  
6381 N. MAIN STREET  
P.O. BOX 1717  
ROSWELL, NM 88202-1717  
Attn: LARRY CAMPBELL  
Invoice Number: 912584

Order #: 91-11-090  
Date: 11/12/91 10:07  
Work ID: PIT ATOKA #3 YATES PLT 8757  
Date Received: 11/11/91  
Date Completed: 11/12/91

## SAMPLE IDENTIFICATION

<u>Sample Number</u>	<u>Sample Description</u>
01	CEMENT PIT ATOKA #3

<u>Sample Number</u>	<u>Sample Description</u>
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QUESTIONS ABOUT THIS REPORT SHOULD BE ADDRESSED TO:  
LABORATORY OPERATIONS MANAGER/ASSAIGAI ANALYTICAL  
7300 JEFFERSON N.E., ALBUQUERQUE, N.M. 87109

*Syed Rizvi*

Certified By  
SYED N. RIZVI



Order # 91-11-090  
11/12/91 10:07

Assaigai Analytical Labs

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REGULAR TEST RESULTS BY TEST

TOTAL REC PET HYDROCARBONS  
Method: EPA 418.1

Minimum: 5.0 Maximum: 100

<u>Sample</u>	<u>Sample Description</u>	<u>Result</u>	<u>Units</u>	<u>Extracted</u>	<u>Analyzed</u>	<u>By</u>
01A	CEMENT PIT ATOKA #3	6700	MG/KG	11/11/91	11/12/91	PV

