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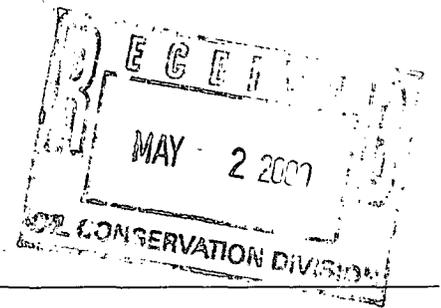
GENERAL CORRESPONDENCE

YEAR(S):

2000



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
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April 26, 2000

Mr. Randall Dunn
SID RICHARDSON GASOLINE COMPANY
P. O. Box 1226
Jal, New Mexico 88252

Re: Closure Report
J. Anthony Ranch Historical Release Site JAR-9
Unit I, Section 6, Township 26 South, Range 36 East
Lea County, New Mexico
Job No. 960001-20

Dear Mr. Dunn:

Transmitted with this letter is the Closure Report for the Sid Richardson Gasoline Company J. Anthony Ranch Historical Release Site JAR-9. The site is located approximately 2 miles southwest of State Highway 205 and Whitworth Drive near Jal, Lea County, New Mexico.

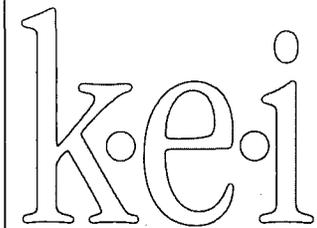
Please contact me at (210) 680-3767 if you have any questions.

Respectfully,

Theresa Nix
Project Manager

Enclosure

cc: William C. Olson, OCD Santa Fe
Chris Williams, OCD Hobbs



CLOSURE REPORT

**SID RICHARDSON GASOLINE COMPANY
J. ANTHONY RANCH HISTORICAL RELEASE SITE JAR-9
UNIT I, SECTION 6, TOWNSHIP 26 SOUTH, RANGE 36 EAST
LEA COUNTY, NEW MEXICO**



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J. ANTHONY RANCH HISTORICAL RELEASE SITE JAR-9
UNIT I, SECTION 6, TOWNSHIP 26 SOUTH, RANGE 36 EAST
LEA COUNTY, NEW MEXICO**

PREPARED FOR:

SID RICHARDSON GASOLINE COMPANY
P. O. Box 1226
Jal, New Mexico 88252

Mr. Randall Dunn

PREPARED BY:

KEI

Theresa Nix
Project Manager

Michael J. Lewis, P.E.
Senior Engineer

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PURPOSE AND SCOPE

The objective of the site closure activities was to obtain closure for the site based on New Mexico Oil Conservation Division (OCD) regulations. The following activities were performed to achieve this objective:

- determination of closure standards
- removal of impacted soil
- characterization of removed impacted soil
- off-site disposal of impacted soil
- sampling remaining soils to verify closure levels
- backfilling the excavation with clean soil
- planting grass seed and irrigating to re-establish vegetative growth

SITE BACKGROUND

The Sid Richardson Gasoline Company, J. Anthony Ranch release site JAR-9, is located 2 miles southwest of State Highway 205 and Whitworth Drive near Jal, Lea County, New Mexico. The site is located in Unit I, Section 6, Township 26 South, Range 36 East. A site location map is presented as FIG. 1.

The landowner notified SRGC of the area that would not sustain vegetative growth. The impacted soil was a result of overfilling tanks at the Sid Richardson A&O tank battery. The product released was condensate and crude oil. A 6-inch buried pipeline was located in the area of the tank battery.

SRGC collected a soil sample from the site on April 26, 1999. The sample was submitted to Trace Analysis Inc. for determination of total petroleum hydrocarbons (TPH) and chloride concentrations. Laboratory results indicated a TPH concentration of 5,540 mg/kg and a chloride concentration of 710 mg/kg. The laboratory report is presented in APPENDIX A.

SRGC contracted KEI to determine vertical and horizontal extent, to confirm maximum TPH concentration, and to determine site closure concentrations. Site details are presented on FIG. 2.

CLOSURE ACTIVITIES

CLOSURE STANDARDS

The New Mexico OCD Guidelines for Remediation of Leaks, Spills, and Releases contains the standard criteria for remediation activities. A ranking analysis for the site was performed to determine appropriate soil remediation levels. The ranking analysis is as follows:

Depth to Ground Water	Greater Than 100 Feet	0 Points
Well Head Protection	Greater Than 1000 Feet to Water Source Greater Than 200 Feet to Private Water Source	0 Points
Surface Water Body	Greater Than 1000 Feet	0 Points
Total Ranking Score		0 Points

Depth to ground water was confirmed by an actual reading obtained at a cathodic ground bed well located approximately 1.5 miles north of the site. Based on the total ranking score, the closure objectives for this site for concentrations of benzene, BTEX, and TPH in soil are summarized below.

CONSTITUENT	CLOSURE CONCENTRATIONS (mg/kg)
BENZENE	10
BTEX	50
TPH	5,000

EXCAVATION, BACKFILL, AND DISPOSAL

The stained surface soils were excavated on August 25, 1999 using a front loader to remove surface sands to reveal the impacted area. The Sid Richardson Gasoline Company's 6 inch gas pipeline was buried at an approximate depth of 5 feet below ground surface in the vicinity of the tank battery. A backhoe was used to excavate around the pipeline to a maximum depth of 8 feet. The remainder of the impacted soils were removed with the front loader. Excavated soil was stockpiled on-site pending transport to the disposal site. The measurements of the excavation and soils removed are summarized below:

MEASUREMENT	VALUE
Length	70 feet
Width	30 feet
Excavated Area	Approximately 2,100 square feet
Maximum Depth	Approximately 8 feet
Volume Disposed	Approximately 768 cubic yards
Fresh Soil Hauled to Site	Approximately 684 cubic yards
Assumed Depth to Water	185 feet

The excavated soils were stockpiled on plastic prior to off-site disposal. KEI collected composite samples from the stockpiled soils on August 26, 1999 and September 3, 1999, and submitted the samples for determination of total petroleum hydrocarbon (TPH) concentrations using modified EPA Method 418.1. The sample obtained on August 26, 1999 was also submitted for determination of benzene, toluene, ethylbenzene, and xylenes (BTEX) concentrations using EPA Method 8020. The concentrations are presented in the following table.

SAMPLE LOCATION	DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL- BENZENE (mg/kg)	XYLENES (mg/kg)	TPH (mg/kg)
Stockpile	08/26/99	0.148	1.00	2.04	7.95	14,300
Stockpile	09/03/99	--	--	--	--	5,250

Soil sample results are summarized in TABLE I. The laboratory report and chain-of-custody documentation are provided in APPENDIX A.

The excavated soil was classified as a RCRA exempt waste material and was stockpiled at the Sid Richardson Gasoline Company Keystone field plant located northeast of Kermit, Texas, under a minor permit from the Texas Railroad Commission (TRC). The soil will be applied to earthen firewall berms at the facility. A copy of the TRC minor permit request is presented in APPENDIX B.

Native silty sand soil from an unaffected borrow pit area of the J. Anthony Ranch was obtained from the landowner and used to backfill the excavation site. On September 8, 1999, approximately 684 yards of soil was used to backfill the excavation. Site photographs are presented in APPENDIX C.

CONFIRMATION SAMPLING

Composite confirmation soil samples were obtained from the excavation floor on August 26, 1999 and from the excavation floor and east and west sidewalls, north wall, and south wall on August 27, 1999. The samples were submitted to Environmental Lab of Texas, Inc. for determination of TPH concentrations using EPA Method 418.1 and BTEX concentrations using EPA Method SW846-8020. The concentration results are presented below:

SAMPLE LOCATION	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYLBENZENE (mg/kg)	XYLENES (mg/kg)	TPH (mg/kg)
Bottom	<0.100	0.168	0.158	0.503	10
North Wall	--	--	--	--	310
South Wall	--	--	--	--	1,110
Bottom - East and West Slope	--	--	--	--	2,640

Soil sample results are summarized in TABLE I. Soil analytical reports are presented in APPENDIX A. The soil sample location and result is presented on FIG. 2.

CLOSURE SUMMARY

The following can be summarized from field and laboratory data:

- soil impacted by Sid Richardson Gasoline Company's release was excavated, stockpiled, and disposed off-site.

Based on activities completed at the site, Sid Richardson Gasoline Company requests that this release site be closed under OCD regulations.

Approximate Scale: 1"=1,000'

0 500 1,000

NOTE: Adjacent properties are not to scale.

SECTION 36
TOWNSHIP 25 SOUTH
RANGE 36 EAST



LEGEND

- Approximate Location of Remediation Site
- Road
- - - Unimproved Access
- PL - 4" Steel Pipe Line
- ⌌ Cattle Guard

03/20/00 RM 0:5ADFT\PROJECTS\PL\600001\SLM-J2



SITE LOCATION MAP

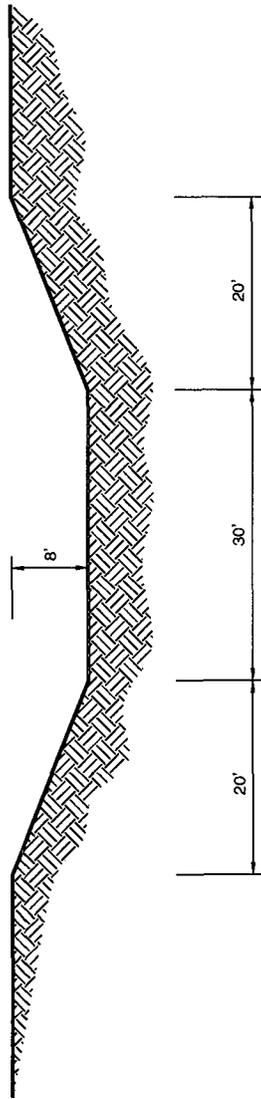
J. ANTHONY RANCH - SITE 9 LEA COUNTY, NEW MEXICO

960001-20-0

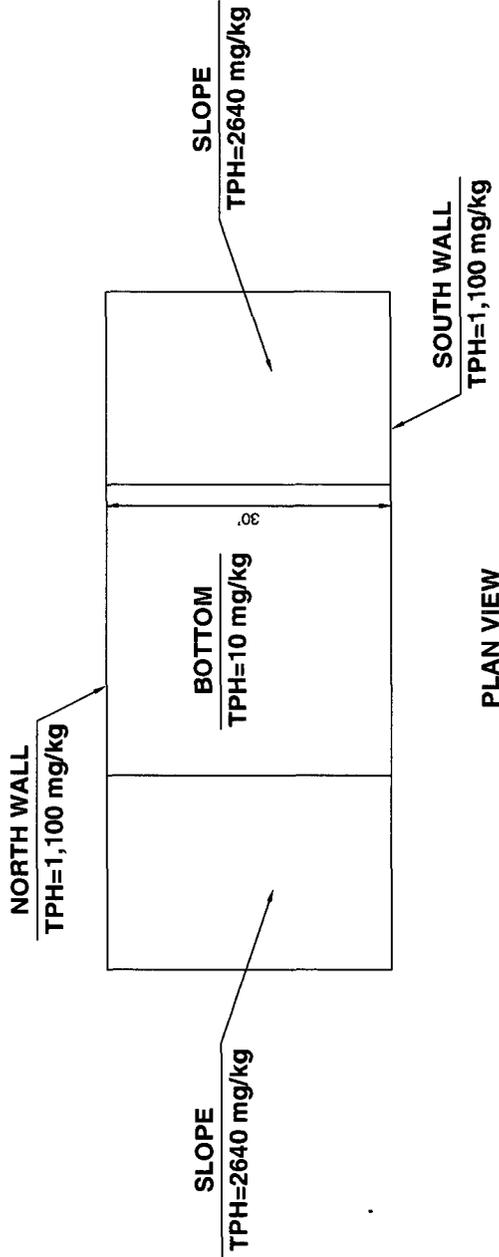
FIG 1

Approximate Scale: 1"=20'

NOTE: Adjacent properties are not to scale.



CROSS SECTION VIEW



PLAN VIEW

SITE DETAILS

J. ANTHONY RANCH - SITE 9

LEA COUNTY, NEW MEXICO

960001-20-0

FIG 2



GENERAL NOTES

-- Indicates sample was not analyzed for constituent listed.

Method detection/reporting limits:

TPH	-	10 mg/kg
Benzene	-	** mg/kg (need lab report to verify)
Toluene	-	** mg/kg (need lab report to verify)
Ethylbenzene	-	** mg/kg (need lab report to verify)
Xylenes	-	** mg/kg (need lab report to verify)

Laboratory test methods:

TPH	-	EPA Method 418.1
BTEX	-	EPA Method 8020

TABLE I

SUMMARY OF LABORATORY RESULTS - SOIL J. ANTHONY RANCH HISTORICAL RELEASE SITE JAR-9

SAMPLE LOCATION	SAMPLE DATE	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL-BENZENE (mg/kg)	XYLENES (mg/kg)	TPH (mg/kg)
STOCKPILE	08/26/99	0.148	1.00	2.04	7.95	14,300
EXCAVATION BOTTOM	08/26/99	<0.100	0.168	0.158	0.503	10
EXCAVATION BOTTOM/SLOPE	08/27/99	--	--	--	--	2,640
NORTH WALL	08/27/99	--	--	--	--	310
SOUTH WALL	08/27/99	--	--	--	--	1,110
STOCKPILE	09/03/99	--	--	--	--	5,250

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI
ATTN: MR. TONY SAVOIE
P.O. BOX 735
JAL, NEW MEXICO 88252
FAX: 505-395-3336

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: 960001-8-0
Project Name: J. Anthony Ranch
Project Location: 2 mi. South of Jal N.M.

Sampling Date: 08/26/99
Receiving Date: 08/26/99
Analysis Date: 08/26/99

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	TPH mg/kg
19589	JAR #9 Comp. Stock Pile	0.148	1.00	2.04	5.51	2.44	14300
19590	JAR #9 Comp. Bottom Screen	<0.100	0.168	0.158	0.352	0.151	10

% IA	97	96	96	91	91	102
% EA	94	89	86	85	86	109
BLANK	<0.100	<0.100	<0.100	<0.100	<0.100	<10

METHODS: SW 846-8020, EPA 418.1


Roland K. Tuttle

8-27-99
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI
ATTN: MR. TONY SAVOIE
P.O. BOX 735
JAL, NEW MEXICO 88252
FAX: 505-395-3476

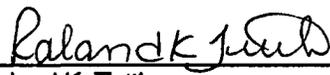
Sample Type: Soil
Sample Condition: Intact/ Iced
Project #: 960001-8-0
Project Name: J. Anthony #9
Project Location: 2 mi. South of Jal

Sampling Date: 08/27/99
Receiving Date: 08/27/99
Analysis Date: 08/28/99

ELT#	FIELD CODE	TPH (mg/kg)
19624	#4 North Wall Composite	310
19625	#5 South Wall Composite	1110
19626	#6 Bottom East & West Slope	2640

% INSTRUMENT ACCURACY	106
% EXTRACTION ACCURACY	100
BLANK	<10

METHODS: EPA 418.1



Raland K. Tuttle

8-30-99
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

KEI
ATTN: MR. TONY SAVOIE
P.O. BOX 735
JAL, NEW MEXICO 88252
FAX: 505-395-3476

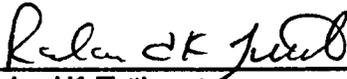
Sample Type: Soil
Sample Condition: Intact/ Iced
Project #: 960001-8-0
Project Name: Sid Rich. #9 Stockpile
Project Location: Jal, N.M.

Sampling Date: 09/03/99
Receiving Date: 09/03/99
Analysis Date: 09/03/99

ELT#	FIELD CODE	TPH (mg/kg)
19782	J.A.R. #9 Stockpile	5250

% INSTRUMENT ACCURACY	101
% EXTRACTION ACCURACY	104
BLANK	<10

METHODS: EPA 418.1



Roland K. Tuttle

9-3-99
Date

MINOR PERMIT REQUEST

WASTE GENERATOR(OPERATOR): Sid Richardson Gasline Co.
MAILING ADDRESS: P.O. Box 1226 Jal, N.M. 88252
CONTACT PERSON: Randall Dunn TELEPHONE NO.: 505-395-2116
CONTRACTOR: KFI

WASTE GENERATION SITE INFORMATION:

GENERATION SITE: OIL OR GAS LEASE GAS PLANT
 COMPRESSOR STA. PIPELINE FACILITY
 SWEETENING FAC. RECLAMATION (R-2) FAC.

OTHER: _____

LEASE NAME: A+O Tank Battery RRC LEASE/I.D. NO.: N M
FIELD NAME(AS SHOWN ON COMMISSION RECORDS) N M
COUNTY: Lea County New Mexico 2 mi South of Jal, N.M.

WASTE INFORMATION:

TYPE OF WASTE: Crude + Distillate Affected Soil
VOLUME OF WASTE: 400 cubic yards
SOURCE OF WASTE: Tank Run-over
IS THIS WASTE RRC-REGULATED, RCRA EXEMPT? YES NO

DISPOSAL SITE INFORMATION:

DISPOSAL INFORMATION: RDSPD. ON LEASE RDSPD. OFF LEASE
 BURIAL ON SITE BURIAL OFF SITE
 FIREWALL REMEDIATION
 RRC PERMITTED FACILITY: _____
 TNRCC PERMITTED FACILITY: _____

TRANSPORTATION BY: Merryman Construction Co.

SIGNED: J. Q. Duvine DATE: 9-1-99

J. ANTHONY RANCH HISTORICAL RELEASE
SITE 9 PHOTOGRAPHS



VIEW OF EXCAVATION



VIEW OF BACKFILLED AREA