

AP - 019

APPROVALS

YEAR(S):

2006



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 17, 2006

Mr. Samuel W. Small, P.E.
Environmental Coordinator
Amerada Hess Corp.
P.O. Box 840
Seminole, TX 79360

RE: NMGSAU Battery 94
Section 3, Township 20 South, Range 36 East
Lea County New Mexico
Stage 2 Abatement Plan (AP-19)
November 2005

Dear Mr. Small:

The New Mexico Oil Conservation Division has reviewed the proposed abatement plan shown above. This plan is hereby approved with the following conditions and understandings:

1. Amerada Hess Corp. (AHC) will prepare the current excavation for safe re-entry of equipment. Once the site is deemed safe, the excavation will be backfilled with the soil that had been excavated and stockpiled on site.
2. Stockpiled soil that had been un-impacted by the hydrocarbon release will be placed in the excavation first.
3. Upon this layer of un-impacted soil, AHC will install a one-foot thick clay barrier, which shall be compacted to 95% Proctor compaction standard.
4. Remaining stockpiled (impacted) soil will be blended on site such that the resulting blended soil does not exceed 2,000 ppm total petroleum hydrocarbons (TPH) and 1,000 ppm chloride. Composite samples shall be taken for confirmation that the blended soils are within these thresholds. This blended soil will then be placed in the excavation on top of the clay barrier, and up to a depth of three feet below ground surface.
5. Stockpiled soils exceeding the thresholds in #4 above will be disposed of at an NMOCD-approved disposal facility.
6. At the resulting depth of three feet below ground surface AHC will install a 20-mil poly liner. Such poly liner shall extend three feet beyond the edges of the area of impact.
7. AHC will then backfill to ground surface with clean soil and the site will be leveled to grade.
8. AHC will continue groundwater monitoring at the site in the remaining monitor wells until eight consecutive quarters are reached in which New Mexico Water Quality Control Commission groundwater standards are not exceeded. Annual reports shall be submitted to the NMOCD Santa Fe office summarizing such activities.
9. Upon completion of the required activities, AHC will submit to the NMOCD Santa Fe office a report summarizing the activities and including all laboratory analyses results.

NMOCD approval of this abatement plan does not relieve AHC of liability should its operations at this site prove to have been harmful to fresh water, public health, or the environment. Nor does it relieve AHC of its responsibility to comply with the rules and regulations of any other governmental entity.

If you have any questions, contact Ed Martin at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read "Roger C. Anderson", written over the typed name.

Roger C. Anderson
Environmental Bureau Chief

Copy: NMOCD, Hobbs
BBC International, Inc.