

AP - 34

**GENERAL
CORRESPONDENCE**

YEAR(S):

2003 - 2004



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

December 3, 2004

Mr. Bob Allen
Safety & Environmental Solutions, Inc.
P.O. Box 1613
Hobbs, NM 88240

Dear Bob:

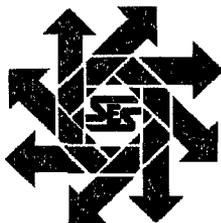
This is in reference to your letter, dated November 23, 2004, requesting an extension of time to perform certain tasks related to abatement plans AP-34 and AP-35 for Navajo Refining Co.

This request is hereby approved. Please have the tasks completed by December 15, 2004. If you have any questions, contact me at 505-476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Edwin E. Martin
Environmental Bureau



P.O. Box 1613
703 E. Clinton Suite 102
Hobbs, New Mexico 88240
505/397-0510
Fax 505/393-4388
www.sesi-nm.com

Safety & Environmental Solutions, Inc.

November 23, 2004

Mr. Ed Martin
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Dear Ed:

This letter is to request an extension of time to complete the requirements listed in the letters dated October 6, 2004, concerning Navajo Refining Company's Abatement Plans AP-34 and AP-35. An extension to December 15, 2004 would be greatly appreciated.

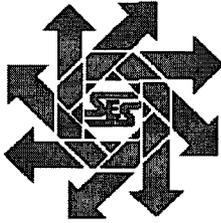
Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Bob Allen".

Bob Allen ASP, CHMM, REM, CET, CES
President

BA/jra



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Safety & Environmental Solutions, Inc.

November 23, 2004

Mr. Ed Martin
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Dear Ed:

This letter is to request an extension of time to complete the requirements listed in the letters dated October 6, 2004, concerning Navajo Refining Company's Abatement Plans ~~AP-34 and AP-35~~. An extension to December 15, 2004 would be greatly appreciated.

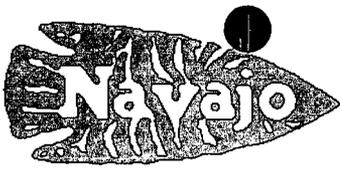
Thank you for your consideration in this matter.

Sincerely,

Bob Allen ASP, CHMM, REM, CET, CES
President

BA/jra

Approved
[Signature]



REFINING COMPANY, L.P.

FAX
(505) 746-5283 DIV. ORDERS
(505) 746-5481 TRUCKING
(505) 746-5458 PERSONNEL

501 EAST MAIN STREET • P. O. BOX 159
ARTESIA, NEW MEXICO 88211-0159
TELEPHONE (505) 748-3311

FAX
(505) 746-5419 ACCOUNTING
(505) 746-5451 EXEC/MKTG
(505) 746-5421 ENGINEERING
(505) 746-5480 PIPELINE

April 2, 2004

RECEIVED

APR 07 2004

Oil Conservation Division
Environmental Bureau

Mr. Roger C. Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re. Abatement Plan AP-34, North Monument 6-Inch Gathering Line, Lea County, NM

Dear Mr. Anderson:

Attached with this letter is the Stage 1 investigation proposal required to be submitted to your office pursuant to your letter of February 4, 2004. The proposal includes information needed to complete the definition of the lateral and vertical extent of soil and groundwater contamination at the site of the Monument pipeline release.

As you know Navajo has been conducting investigation and recovery activities in the area since discovery of the release in October 2002. To date we have recovered nearly 1,100 barrels of crude oil through placement of 24 pumps in shallow recovery boreholes and weekly pumping of outlying boreholes that do not have pumps installed.

During the time of review of this proposed Stage 1 Abatement Plan and subsequent to its anticipated approval by OCD, Navajo will continue with the existing oil recovery program, including completion of boreholes for temporary use for oil recovery. During this time, and prior to submittal and approval of a Stage 2 Abatement Plan, Navajo may desire to initiate additional actions to recover hydrocarbon and/or to prevent or minimize free or dissolved phase hydrocarbon movement from existing impacted area. If such work is proposed, Navajo will notify the OCD of the proposed activity and seek to meet and discuss the anticipated work with the OCD prior to beginning work.

Mr. Roger Anderson
April 2, 2004

Page 2

If you have any questions on the proposed Stage 1 abatement plan, please contact me at (505) 748-3311.

Sincerely,
NAVAJO REFINING COMPANY

A handwritten signature in black ink that reads "Darrell Moore". The signature is written in a cursive, slightly slanted style.

Darrell Moore
Environmental Manager for Water and Waste

cc: Jim Townsend, President, Navajo Pipeline Company
Phil Youngblood, Director of Environmental Affairs
David Boyer, Safety and Environmental Solutions, Inc.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

February 4, 2004

Mr. Darrell Moore
Navajo Refining Company
P.O. Box 159
Artesia, New Mexico 88211

**RE: ABATEMENT PLAN AP-35
HOBBS NORTH GSA 6 INCH GATHERING LINE
LEA COUNTY, NEW MEXICO**

Dear Mr. Moore:

The New Mexico Oil Conservation Division (OCD) has recently reviewed the case file on Navajo Refining Company's (Navajo) soil and ground water remediation actions at the Hobbs North GSA 6 Inch Gathering Line located in Unit A, Section 5, Township 19 South, Range 38 East, Lea County, New Mexico.

A review of the files shows that ground water at the site has not been remediated to New Mexico Water Quality Control Commission (WQCC) ground water standards within one year of discovery of the contamination. Therefore, the OCD requires that Navajo submit to the OCD by April 4, 2004 a Stage 1 investigation proposal to complete the definition of the lateral and vertical extent of soil and ground water contamination pursuant to OCD Rule 19.E.1. and OCD Rule 19.E.3. The investigation work conducted to date can be incorporated into the Stage 1 investigation proposal. Please submit a copy of the Stage 1 proposal to the OCD Hobbs District Office.

If you have any questions, please contact Bill Olson at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

Roger C. Anderson

Environmental Bureau Chief

RCA/wco

xc: Chris Williams, OCD Hobbs District Office
Gary Don Reagan, Hobbs City Attorney

Olson, William

From: Johnson, Larry
Sent: Monday, November 17, 2003 8:06 AM
To: Olson, William
Subject: FW: Lea Projects

-----Original Message-----

From: Darrell Moore [mailto:darrell.moore@navajo-refining.com]
Sent: Wednesday, November 12, 2003 8:24 AM
To: LWJohnson@state.nm.us
Subject: Lea Projects

Larry,

Here is the weekly report for our projects in Lea County. If you have any questions, call me at 505-746-5281.
Thanks

North Monument 6" Crude Line

Daily and weekly pumping and weekly measurements are continuing as previously reported. MaClaskey moved oil to the frac tank on Friday. Measurements of oil and water recovered will be made today and reported in an update later today or tomorrow. We have requested that the electricians place a third electrical panel on the north side of the excavation to allow 24/7 pumping of wells in that area. Resampling of MW-5 on 11/06 confirms a benzene detection of 0.070 mg/L (the previous result was 0.045 mg/L sampled on 10/15). This well will be monitored more frequently for plume delineation; no product or odor has been detected in the well. Water level measurements will be made this week to provide an updated groundwater map showing direction of groundwater movement and gradient.

Hobbs South GSA 8" Crude Line

Product recovery is continuing 24/7 using the PVC pumps until failure. Pumps are being replaced in the excavation as they fail, but following pump failure at other locations the wells will be pumped at least weekly using a portable pump and tote on a trailer. The stainless steel prototype pump has been shipped and will arrive this week. We continue talks with the supplier and manufacturer regarding the need for a more sturdy, cost-efficient pump for oil recovery. Drillers will be on site this morning to continue borehole placement to the east and to the west of the excavation as requested by OCD. Also, this week we will perform groundwater sampling of the monitor wells at the site.

Hobbs North GSA 8" Crude Line

We have discussed pumping and solar panel problems with Dixie Electric. The solar panel is limited to 12 volts output. They have suggested that we place a second battery in parallel at the box to produce additional amps. If that does not work, we will put a power booster on the pump.

Darrell Moore
Environmental Manager for Water and Waste
Navajo Refining Company
P.O. Box 159
Artesia, NM 88211
Direct Phone: 505-746-5281
Fax: 505-746-5421
Cell: 505-365-4364

12/1/2003