

AP - 57

**GENERAL
CORRESPONDENCE**

YEAR(S):
2006

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Wednesday, November 29, 2006 3:29 PM
To: 'Cliff P. Brunson'
Cc: Amy C. Ruth; Drew Hall ; Jennifer Gilkey
Subject: RE: Stage 1 - Texaco "G" State Battery 22-~~AP057~~ Extension Request

Dear Mr. Brunson and Mr. Hall:

The NMOCD has reviewed your request for an extension to submit additional information requested by the NMOCD regarding the above referenced site. Per our telephone conversation of today, the NMOCD understands that an additional 15 days is required to compile the additional data. Therefore, the NMOCD hereby approves the request for extension for submittal of additional information until Friday, December 22, 2006.

Please be advised that NMOCD approval of this extension does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any NMOCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Cliff P. Brunson [mailto:cbrunson@bbcinternational.com]
Sent: Wednesday, November 29, 2006 11:01 AM
To: Hansen, Edward J., EMNRD
Cc: Amy C. Ruth; Drew Hall ; Jennifer Gilkey
Subject: Stage 1 - Texaco "G" State Battery 22-AP057-Extension Request

Edward,

Per our conversation, this is to request an extension to the submittal date of the Amended Stage 1 Plan for the above referenced site. I would appreciate having the submittal date changed from December 7, 2006 to December 22, 2006 so that MW-3 can be sampled and the data from MW-3 be included in the Amended Plan. In addition, the information concerning the clay will also be available by then so it will be included as well.

I appreciate your cooperation and I look forward to your approval via reply e-mail.

Thank you,

Cliff

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Cliff P. Brunson, CEI, CRS
President

11/29/2006

BBC International, Inc.
World-Wide Environmental Specialists
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Hobbs, NM 88241-0805 USA
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No virus found in this outgoing message.
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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

November 1, 2006

Hess Corporation
Attn: Drew Hall
P.O. Box 840
Seminole, Texas 79360

**RE: Stage 1 Abatement Plan (AP-57) for the Texaco New Mexico State "G" Battery #22
Unit Letter N, Section 19, T19S, R37E, Lea County, New Mexico
AP057**

Dear Mr. Hall:

The Oil Conservation Division (OCD) has received Hess Corporation's (Hess) Stage 1 Abatement Plan (AP-57) for the Texaco New Mexico State "G" Battery #22, dated October, 2006. The OCD has conducted an initial review of the Plan and cannot deem the Plan administratively complete because Hess has not submitted all the information required by Rule 19.E(3). I have attached a list of items that must be included as part of the Stage 1 Abatement Plan in accordance with Rule 19.E(3) (19.15.1 NMAC). Although the OCD cannot officially comment on technical issues until the Stage 1 Abatement Plan has been deemed administrative complete, the attached list offers some preliminary technical comments for your consideration.

Please address each item in the attached list and submit a revised Stage 1 Abatement Plan within 30 days of receipt of this letter. Once these items have been adequately addressed, then the OCD can deem the Stage 1 Abatement Plan complete. Also, after the Stage 1 Abatement Plan is complete, then the OCD will advise you regarding the required Public Notice. If you have any questions regarding this matter, please call me at 505-476-3489.

Sincerely,

Edward J. Hansen
Hydrologist
Environmental Bureau

EJH:ejh

cc: Larry Johnson; OCD; Hobbs District Office
Cliff P. Brunson, CEI, CRS; President; BBC International, Inc.; Hobbs

**AP-57: Stage 1 Abatement Plan
Administrative and Preliminary Technical Comments**

1. Please describe in detail the nature of the release; i.e., describe what was released from where and when at the site. Also, please include in the Stage 1 Abatement Plan the Form C-141 for this site. [Rule 19.E.(3)(a)]
2. Provide additional information regarding the volume of material excavated of both the G Lact Pile and the Burn Pit Rim Spoils and the landfarm(s) where the material was disposed. Also, please provide additional information regarding the depth to which the Battery Area was excavated and the landfarm(s) where the material was disposed. [Rule 19.E.(3)(a)]
3. Regarding the backfilling: this was represented to the Division as an emergency situation and you were proceeding at risk. Please indicate the purpose of the clay liner. Provide the hydraulic conductivity and the source of the material used for the clay liner. Also, provide the source of the material for backfilling the Battery Area Excavation and the Associated Pit Excavation. [Rule 19.E.(3)(a)]
4. Please indicate in Table 1 if the soil samples labeled, "MW-4", are from the currently labeled borehole, SB-4. Also, please correct the sample date from "6/12/06" to 6/8/06 for these corresponding samples. In addition, please indicate in Table 1 if the soil sample labeled "SB-2" is from the currently labeled monitoring well, MW-1. [Rule 19.E.(3)(a)]
5. Please include a brief description of the Ogallala Aquifer specific to the site, including hydraulic conductivity, probable aquifer thickness at the site, an estimated velocity of ground water flow (these values may be obtained from regional hydrologic studies). [Rule 19.E.(3)(b)]
6. Also, provide an inventory of water wells within one mile of the site; especially those wells that could be potentially impacted by the release (these well locations may be obtained from the website of the Office of the State Engineer: <http://iwaters.ose.state.nm.us:7001/iWATERS/>). [Rule 19.E.(3)(b)]
7. MW-5 and MW-6, the most downgradient monitoring wells indicate concentrations above the apparent background concentrations for various constituents (and also above the numeric ground water protection standard). Please include an east-west geological cross-section of the site and a north-south geological cross-section of the associated pit area. The cross-sections should include concentration isopleths for constituents of concern. Also, please include a site plan map with concentration isopleths for constituents of concern. [Rule 19.E.(3)(b)]

AP-57: Stage 1 Abatement Plan
Administrative and Preliminary Technical Comments

8. Please include a ground water monitoring plan that will be conducted as part of the Stage 1 Abatement Plan, including which monitoring wells will be sampled, which parameters will be analyzed, and at what frequency. The monitoring plan must include the sampling of ground water in monitoring wells even if NAPL is present. Also, please submit the ground water monitoring well construction diagrams for each well installed at the site. [Rule 19.E.(3)(c)]
9. Provide a schedule for further site investigation activities. Specifically, in the central portion of the Tank Battery Area there were TPH concentrations exceeding OCD's recommended remediation level of 100 mg/Kg (e.g., soil sample points: #4, #5, and #8) for this site. Also, in the area of the Associated Pit, TPH concentrations greater than the recommended remediation level were detected. Please indicate what further investigation will be conducted to delineate the TPH concentrations in these areas. [Rule 19.E.(3)(e)]
10. In addition, elevated concentrations of chloride were detected in SB-3, SB-4 and MW-3. Please indicate what further investigation will be conducted to delineate the chloride concentration in the vadose zone in the area of the Associated Pit. [Rule 19.E.(3)(e)]
11. Additional groundwater monitoring (e.g., MW-3) must be conducted to delineate the ground water contamination. This may also require additional ground water monitoring well to be installed at the site (e.g., downgradient of MW-6). [Rule 19.E.(3)(e)]
12. Provide the "survey" that was referenced in the letter from the abstract company that obtained the addresses of the surface owners. [Rule 19.G.(1)(a)]



PHONE (505) 397-6388 • FAX (505) 397-0397 • 1324 W. MARLAND • P.O. BOX 805 • HOBBS, NM 88241-0805
E-MAIL: cbrunson@bbcinternational.com

RECEIVED

July 29, 2006

Mr. Wayne Price
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

AUG 09 2006

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**RE: NMOCD AP-57
Hess Corporation
Texaco State G Lact Unit Battery 22
UL "N", Section 19, T19S, R37E
Monument, NM
Lea County, New Mexico**

Dear Mr. Price:

BBC International, Inc., (BBC) on behalf of Hess Corporation (Hess), respectfully submits this letter to request an extension to the deadline of submitting a Stage 1 Abatement Plan for the above referenced site.

The original deadline was set for July 31, 2006, but with the recent additional investigation activities comprised of more soil borings and the installation of three (3) new groundwater monitoring wells bringing the total to six (6) monitor wells, we need additional time to compile the data, prepare maps, and complete the report with the necessary components required under Rule 19.

Therefore, we request an extension to September 15, 2006 to submit the Stage 1 Abatement Plan. We will submit the Abatement Plan prior to September 15, if possible.

I appreciate your cooperation and understanding in this matter. If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Cliff P. Brunson, CEI, CRS
President

CPB:jg

cc: Drew Hall – Hess Corporation
Amy Ruth – BBC International, Inc.

Price, Wayne, EMNRD

From: Hall, Drew [drewhall@Hess.com]
Sent: Thursday, June 08, 2006 12:31 PM
To: Price, Wayne, EMNRD
Subject: Re: Hess Corp - Texaco State G Lact Unit Battery 22

Wayne,

Thank you for your quick response. We will conduct the work as per the conditions described below. Myself or BBC will send along the requested information today via email. We will keep you and the district office informed of our progress.

Best Regards,

Drew Hall
Hess Corporation
4322094248

Sent from my BlackBerry Wireless Handheld

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

From: Price, Wayne, EMNRD <wayne.price@state.nm.us>
To: Amy C. Ruth <Amy@bbcinternational.com>
CC: Hall, Drew <drewhall@Hess.com>; Small, Sam <SSmall@Hess.com>; Barnes, Randy <RBarnes@Hess.com>; Jennifer <jgilkey@bbcinternational.com>; Williams, Chris, EMNRD <chris.williams@state.nm.us>; Sheeley, Paul, EMNRD <paul.sheeley@state.nm.us>; Johnson, Larry, EMNRD <larry.johnson@state.nm.us>; Sanchez, Daniel J., EMNRD <daniel.sanchez@state.nm.us>
Sent: Thu Jun 08 13:21:53 2006
Subject: RE: Hess Corp - Texaco State G Lact Unit Battery 22

Pursuant to OCD Rule 19.D.g OCD hereby grants Hess Corp approval to proceed work with the following conditions:

1. All documents submitted shall be identified with the OCD# AP-57.
2. Notify the OCD district office of these activities.
3. All monitor wells shall be installed, developed and sampled pursuant to EPA/OCD methods normally used.
4. A report shall be submitted by July 31, 2006 with findings, conclusions and recommendations.
5. Provide the following information today via E-mail. Legal Location, depth to groundwater, Name of Operator, and County.

Please be advised that NMOCD approval of this plan does not relieve the owner/operator of Responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Amy C. Ruth [mailto: Amy@bbcinternational.com]
Sent: Wednesday, June 07, 2006 5:49 PM
To: Price, Wayne, EMNRD
Cc: drewhall@hess.com; 'Small, Sam'; 'Barnes, Randy'; Jennifer
Subject: Hess Corp - Texaco State G Lact Unit Battery 22

Wayne,

Per your request during our conversation this afternoon, here is a photo of the excavation on the east end of Texaco State G Lact Unit Battery 22. The excavation is 15 feet deep, and a soil boring was drilled in the center. Hydrocarbon impacted groundwater was encountered at this soil boring at approximately 22 feet below ground surface. We are requesting permission to install 4 monitor wells placed up gradient, down gradient, and side gradient of the excavation. These wells will be developed, purged, and sampled for BTEX and Chlorides. A report detailing site activities and analytical results will be sent to you shortly after the completion of aforementioned activities.

I appreciate your assistance in this matter. If you have questions, please contact me.

Amy C. Ruth

Environmental Scientist

BBC International, Inc.

Phone: 505-397-6388

Cell: 505-441-5252

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Price, Wayne, EMNRD

From: Williams, Chris, EMNRD
Sent: Wednesday, June 07, 2006 3:08 PM
To: Price, Wayne, EMNRD
Subject: FW: Hess Corporation - Texaco State G Lact Unit Battery 22

For your files.

Chris Williams
District 1 Supervisor

From: Amy C. Ruth [mailto:Amy@bbcinternational.com]
Sent: Wed 6/7/2006 2:51 PM
To: Williams, Chris, EMNRD
Cc: Sheeley, Paul, EMNRD; drewhall@hess.com; 'Small, Sam'; 'Barnes, Randy'; Jennifer
Subject: Hess Corporation - Texaco State G Lact Unit Battery 22

Chris,

On behalf of Hess Corporation, this is to inform you that during soil boring sampling activities at the abandoned Texaco State G Lact Unit Battery 22 yesterday afternoon, Tuesday June 6, 2006, BBC tracked hydrocarbon impact to the groundwater. Groundwater mixed with non-aqueous phase liquids was encountered at approximately 22 feet below ground surface. A site investigation will commence which will include additional sampling and the installation of groundwater monitoring wells.

We will keep NMOCD informed of all activities and results. Below is the legal information for this location. If you have questions, please contact me at 505-397-6388 or via email.

Texaco State G Lact Unit Battery 22
Unit Letter N Sec 19 T19S R37E

Sincerely,

Amy C. Ruth
Environmental Scientist
BBC International, Inc.
Phone: 505-397-6388
Cell: 505-441-5252