



Industrial Services Group
Central Region

February 6, 1998

Mr. Randy Vandenberg
Williams
Ignacio Field District
P. O. Box 316
Ignacio, Colorado 81137

RECEIVED
FEB 26 1998
OIL CON. DIV.
DIST. 3

Project 19117

Re: **Spill Clean-up Oversight**

NM 32-11 Com #2A Wellsite, 0-19-32 N-11 W
Aztec, New Mexico

Dear Mr. Vandenberg:

Philip Services Corporation (Philip) was retained by Williams on January 28, 1998 to provide regulatory agency negotiation support with the New Mexico Oil Conservation Division (OCD) Aztec, NM office, and associated environmental oversight of spill clean-up activities at the subject wellsite.

Background

Based on information obtained from an OCD Form C-141 completed by Ms. Ingrid Decklau of Williams on January 21, 1998, a 100 to 130 barrel release of condensate occurred at the subject site sometime between January 9-18, 1998, due to a ruptured pull valve on a steel stock tank. The release was reportedly contained in an area surrounded by a berm. The bermed area held a fiberglass tank in addition to the aforementioned steel stock tank (which the release occurred from). It was further reported to Philip that approximately 80 barrels of liquid condensate was recovered using a liquid vacuum truck.

Philip's Oversight

Mr. Denny Foust, Deputy Oil & Gas Inspector of the OCD's Aztec District Office was contacted by Philip via telephone to discuss environmental closure procedures for the subject site prior to implementation on February 3, 1998. Mr. Foust stated that the 210-barrel capacity steel tank and fiberglass tank (production equipment) would not have to be relocated in order to mitigate the release. Mr. Foust also stated in that same conversation that the only sampling/analysis required to close the spill site was a "heated headspace analysis" utilizing a portable photoionization detector (PID; no total petroleum hydrocarbon analysis required).

Philip completed the NM One-Call (required prior to conducting underground excavation activities) to locate underground lines at the site, and mobilized a crew including a rubber tire - mounted backhoe to the site as instructed by Williams on February 4, 1998. The purpose of the

Combining the Strengths of Philip Services Corp., Allwaste and Serv-Tech



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field crew was to excavate impacted soil based on field PID readings, and relocate the impacted soil to a prepared treatment area situated on the well pad. However, a roustabout crew (which was equipped with a backhoe) had been ordered by Williams. Therefore, Philip's backhoe crew was released by Williams. Philip's role was thus adjusted to sample and analyze soil collected during contaminated soil excavation procedures conducted by the roustabout crew contracted by Williams. All of the field analysis results were above the 100 parts per million (ppm) OCD action level (please refer to attached figures).

Approximately 50-60 cubic yards of hydrocarbon-impacted soil was removed from the release area and relocated to an on-pad treatment area. The following day, reportedly a similar amount of soil was removed by the roustabout crew and deposited in the treatment area for a total volume of approximately 100 cubic yards. Excavation took place down to bedrock (four feet deep north of the steel tank, two feet deep south of the steel tank, and approximately ten feet deep in the area of the fiberglass tank) and within the bermed area. Fill material was reportedly borrowed from the well pad and utilized to backfill the excavation. Philip intends to treat the impacted soil using a cultivator and tractor, conduct field PID sampling to confirm clean-up levels have been attained, and place the treated soil back in the "borrow" area.

If you have any questions or if we may be of further assistance, please contact the undersigned at (800) 326-2262.

Respectfully submitted,

PHILIP SERVICES CORPORATION



David R. Cesark, R.G., R.E.A.
Project Manager

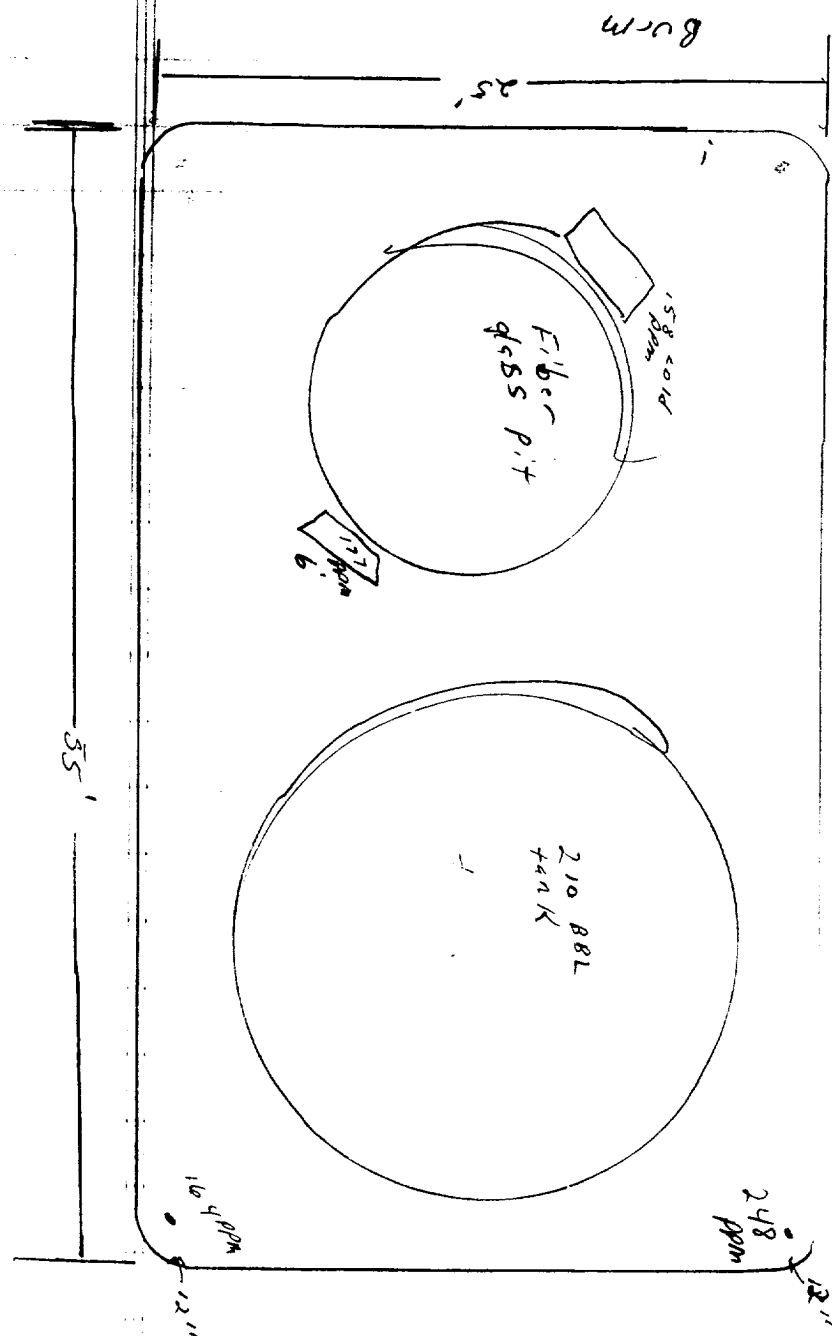
Enclosure

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cc: Mr. Denny Foust

SITE MAP

N
1 (NOT TO SCALE)



RECEIVED
 MAR - 5 1998
 OIL CON. DIV.
 DIST. 3

↑
 Road
 IN

□ Meter House
 ○ another pit

1 = Drawing

1
N

(NOT TO SCALE)

