

AP – 001

2015 STAGE 2 AP

06 / 08 / 2015



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June 8, 2015

Mr. Glenn Von Gonten
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Subject: Addendum to Stage 2 Abatement Plan
Former Brickland Refinery Site
Sunland Park, New Mexico
(Abatement Plan AP-001) – New Mexico Oil Conservation Division Approval Correspondence

Dear Mr. Von Gonten:

Huntsman is providing the New Mexico Oil Conservation Division (NMOCD) with an Addendum to Abatement Plan AP-001 for the Former Brickland Refinery. The Addendum is being provided in response to the Huntsman request to modify groundwater sampling that was provided to the NMOCD on November 7, 2014, which was subsequently approved by the NMOCD on April 24, 2015. As described in our response to your approval dated April 30, 2015, Huntsman is providing an Addendum to the Stage 2 Abatement Plan to incorporate the approved modifications to the sampling program into Abatement Plan AP-001.

Groundwater Monitoring

Section 3.5 (Groundwater Monitoring Program) of Abatement Plan AP-001 is being revised to include a description of the modified program. Groundwater samples will be collected at Monitoring Wells MW-3S, MW-3D, MW-5, MW-6S, MW-6D, MW-8, MW-9S, MW-10, MW-11, and MW-17 for benzene analyses. Groundwater collected from Monitoring Well MW-8 will also be analyzed for polynuclear aromatic hydrocarbons. Sampling will occur on a quarterly frequency.

Section 3.7 (Schedule) is also being revised to include the schedule to implement the revised groundwater monitoring program that will now be conducted on a quarterly basis.

As part of this addendum, the following replacement pages to Abatement Plan 001 are provided:

- Revised Section 3.5 and Section 3.7 are provided as Replacement Page 29 as Attachment A.
- Revised Table 3 (Abatement Plan Schedule) is provided as Replacement Page 30 Attachment B.

Work Plan Preparation

In our April 30, 2015, response to your approval, we indicated that the addendum would also address plug and abandonment of monitoring wells no longer used to collect groundwater quality data. Additionally, the addendum would address soil excavation to eliminate tar at WP-14. Table 3 (Abatement Plan Schedule), provided as Attachment B, has been revised to include:

- Submit Work Plan for Plug and Abandonment of Monitor Wells (July 2015)
- Submit Work Plan for Soil Excavation at WP-14 (July 2015)

- Implement Field Program for Monitor Well Plug and Abandonment (September 2015)
- Implement Field Program for Soil Excavation at WP-14 (September 2015)

Summary reports for plug and abandonment of monitoring wells and soil excavation at WP-14 will be provided to the NMOCD with the Annual Groundwater Report due on or before April 1, 2016.

Again, we appreciate your approval to modify the sampling performed at the former Brickland Refinery site. If you have any questions or require additional information on our addendum, please contact me at 281-719-3039 or via email at ed_l_gunderson@huntsman.com.

Sincerely,



Ed Gunderson

Senior Manager, EHS Legal and Regulatory Compliance

Attachment A

Revised Sections 3.5 and 3.7 (Groundwater Monitoring)
Abatement Plan AP-001
Replacement Page 29

ensuring equipment is functioning and connected properly, and verifying the system has not been damaged or deactivated. Operation and maintenance of the free-phase product recovery system and the cover shall be conducted concurrent with the quarterly sampling events.

The perimeter fence, all gates, and locks will be inspected for breaches in integrity. In addition, the culverts will be inspected to ensure complete closure is maintained. The inspection will occur concurrent with quarterly sampling. Any identified breaches will be repaired or immediately corrected.

3.5 Groundwater Monitoring

Groundwater monitoring will continue on a quarterly basis, in March, June, September, and December, according to the approved modified groundwater monitoring plan. Per NMOCD approval dated April 24, 2015, the modified groundwater monitoring program includes collection of groundwater samples at Monitoring Wells MW-3S, MW-3D, MW-5, MW-6S, MW-6D, MW-8, MW-9S, MW-10, MW-11, and MW-17 for benzene analyses. Groundwater collected from Monitoring Well MW-8 will also be analyzed for polynuclear aromatic hydrocarbons². An annual report will be submitted no later than April 1 of each year summarizing the results of both sampling events¹.

3.6 Public Notice

Public notice will be performed following the requirements cited in Sections 4108.B and 4108.C of the NMWQCC Regulations. NMOCD has approved the text of the public notice and the list of the recipients of such notice.

3.7 Schedule

Huntsman will begin implementation of the modified groundwater sampling program, plug and abandonment of wells no longer used as part of groundwater monitoring, and soil excavation to remove tar at the location of WP-14 following the schedule provided in Table 3².

¹Revised 03/10/2003

²Revised 06/08/2015

Attachment B

Revised Table 3 (Abatement Plan Schedule)
Abatement Plan AP-001
Replacement Page 30

Table 3²
Abatement Plan Schedule

Task/Action	2015							2016				
	June	July	August	September	October	November	December	January	February	March	April	May
Submit Work Plan for P&A of Wells		■										
Implement Field Program				■						■		
Provide Summary Report ^(a)											■	
Submit Work Plan for Soil Excavation to Remove Tar at WP-14		■										
Implement Field Program				■						■		
Provide Summary Report											■	
Quarterly Sampling ^(b)	■			■			■			■		
Annual Report											■	

(a) to be provided with annual groundwater report.

(b) to commence during June 2015