

1R - 346

APPROVALS

YEAR(S):

2002 -

Olson, William

From: Olson, William
Sent: Thursday, March 07, 2002 9:02 AM
To: 'ALLSTATEENV@aol.com'
Cc: Johnson, Larry; Sheeley, Paul
Subject: Case # 1R346 - Rhombus NW Eumont Unit



RemApr2.DOC

Dear Mr. Kerby:

Attached is a copy of the OCD's approval of your March 4, 2002 modifications to the prior remediation plan. A hard copy has also been mailed. If you have any questions please contact me.

Sincerely,

William C. Olson
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3491

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

From: ALLSTATEENV@aol.com [mailto:ALLSTATEENV@aol.com]
Sent: Monday, March 04, 2002 4:09 PM
To: wolson@state.nm.us
Subject: Rhombus NW Eumont Unit

Mr. Olson,

Included with this note is an attachment/letter describing completion of the remediation activities at the NW Eumont as discussed today by you and Randy Offield.

Regards,

Hamp Kerby



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

March 6, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004-3929-7211

Mr. Greg Cielinski
Rhombus Operating Company
P.O. Box 8316
Midland, Texas 79708

**RE: CASE #1R346
NORTHWEST EUMONT UNIT SPILL SITE**

Dear Mr. Cielinski:

The New Mexico Oil Conservation Division (OCD) has reviewed Rhombus Operating Company's (Rhombus) March 4, 2002 e-mail titled "RHOMBUS NW EUMONT UNIT" and attached March 4, 2002 correspondence titled "RHOMBUS OPER. NW EUMONT SPILL SITE" which were submitted on behalf of Rhombus by their consultant Allstate Environmental Services, LLC. These documents contain proposed modifications to Rhombus' prior plan for remediation of contaminated soil from a oil and produced water spill from a pipeline at the Northwest Eumont Unit site located in Unit J, Section 22, Township 22 South, Range 36 East, Lea County, New Mexico. Rhombus' prior remediation plans were approved by the OCD on February 26, 2002.

Rhombus' March 4, 2002 remediation plan modifications are approved with the following conditions:

1. The liner shall be made of HDPE with a minimum thickness of 20 mils and shall be installed according to manufacturer specifications.
2. Rhombus shall notify the OCD Hobbs District Office at least 24 hours in advance of installation of the liner such that the OCD has the opportunity to witness the events.

Please be advised that OCD approval does not relieve Rhombus of responsibility if the proposed work plan fails to adequately remediate contamination related to Rhombus' activities. In addition, OCD approval does not relieve Rhombus of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson", written in a cursive style.

William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office
Randy Offield, Allstate Environmental Services, LLC
Myra Meyers, State Land Office

Olson, William

From: ALLSTATEENV@aol.com
Sent: Monday, March 04, 2002 4:09 PM
To: wolson@state.nm.us
Subject: Rhombus NW Eumont Unit



Rhombus NW
umont Closure 3-4.

Mr. Olson,

Included with this note is an attachment/letter describing completion of the remediation activities at the NW Eumont as discussed today by you and Randy Offield.

Regards,

Hamp Kerby

March 4, 2002

Mr. Bill Olson
New Mexico OCD
1220 S. Saint Francis Dr.
Santa Fe, NM 87505

SUBJECT: Rhombus Oper. NW Eumont Spill Site

Dear Mr. Olson,

Per your conversation today with Randy Offield, Allstate Environmental Svcs., closure of the subject site will be completed as follows:

- 1) The excavated area will be filled to within 3 ft. of the surface with mixed soil that has been determined to be at or below 274 ppm cl.
- 2) A one piece liner will be spread over the surface at that point and lapped up one ft. along the circumference of the excavated area, then covered by 2 inches of sand.
- 3) At that point the area will be filled and leveled to grade with clean topsoil.
- 4) The remainder of the soil not used as backfill will be hauled to C&C Landfarm.

Any concerns or questions about this plan may be addressed to Randy Offield at 915-682-3547 or to his e-mail at allstateenv@aol.com.

Sincerely,

C. H. Kerby for Randy Offield

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

1220 South Saint Francis Drive
P.O. Box 6429
Santa Fe, New Mexico 87505-5472

1R346

2/28/02 Photos

RHOMBUS OPERATING CO., LTD.

NORTHWEST EUMONT UNIT

WELL # 127

UNIT J, SEC. 22, T19S, R36E

2/28/02

Rhombus Well #127

Produced water spill remediation



2/28/02

Rhombus - Well # 727

Produced water spill remediation

Olson, William

From: Olson, William
Sent: Tuesday, February 26, 2002 4:11 PM
To: Bobby Blackwood - Allstate Environmental Services (E-mail)
Cc: Anderson, Roger; Johnson, Larry; Sheeley, Paul; Williams, Chris; Wrotenbery, Lori
Subject: Rhombus - NW Eumont Spill Site

Dear Mr. Blackwood:

Attached is an unsigned copy of the OCD's conditional approval of Allstate's work plan for the above referenced site. The original signed copy was sent in the mail to Rhombus. If you have any questions please call me.

Sincerely,



William C. Olson
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3491



RemApr1.DOC



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

February 26, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004-3929-7204

Mr. Greg Cielinski
Rhombus Operating Company
P.O. Box 8316
Midland, Texas 79708

**RE: CASE #1R346
NORTHWEST EUMONT UNIT SPILL SITE**

Dear Mr. Cielinski:

The New Mexico Oil Conservation Division (OCD) has reviewed Rhombus Operating Company's (Rhombus) February 26, 2002 e-mail titled "SUMMARY OF ACTIVITIES – RHOMBUS NW EUMONT, MONUMENT, N.M." and January 4, 2002 "REMEDIATION PLAN, JANUARY 4, 2002, RHOMBUS OPERATING CO., NORTHWEST EUMONT UNIT, LEA COUNTY, NEW MEXICO" which were submitted on behalf of Rhombus by their consultant Allstate Environmental Services, LLC. These documents contain Rhombus' plan for remediation of contaminated soil from a oil and produced water spill from a pipeline at the Northwest Eumont Unit site located in Unit J, Section 22, Township 22 South, Range 36 East, Lea County, New Mexico.

The above-referenced remediation plans are approved with the following conditions:

1. Due to the site location, Rhombus shall install a 2 foot compacted clay cap above the blended and backfilled soils at a depth of three to five feet below the ground surface. The clay cap shall be compacted according to ASTM standards. The remainder of the excavation above the clay cap shall be backfilled with clean soil and mounded to account for settling and prevent erosion of the surface during reseeding activities.
2. Rhombus shall obtain a soil sample for every 100 yards of blended backfill which demonstrates that the blended backfill meets the proposed soil remediation levels.
3. All soil samples shall be obtained and analyzed according to EPA approved methods and quality assurance/quality control (QA/QC) procedures.
4. Rhombus shall implement measures to prevent runoff from the site during the blending and backfilling operations.

5. Rhombus shall construct control devices to prevent erosion of the seeded areas upon completion of the backfilling operations.
6. All wastes taken for offsite disposal shall be disposed of at an OCD approved facility.
7. Rhombus shall notify the OCD Hobbs District Office at least 24 hours in advance of installation of the clay cap and other significant activities such that the OCD has the opportunity to witness the events.
8. Rhombus shall submit a report on all remediation activities to the OCD Santa Fe Office by April 26, 2002 with a copy provided to the OCD Hobbs District Office. The report shall contain:
 - a. A description of all remediation activities which occurred.
 - b. A site map showing the location of the pipeline, spill areas, excavated areas, sample locations, blending and stockpile locations, and any other pertinent site features.
 - c. A cross-sectional diagram of the excavation showing the area excavated and backfilled including the clay cap and clean fill.
 - d. Information showing that the clay cap was constructed according to ASTM standards.
 - e. A summary of all soil sampling results including copies of the laboratory analyses and associated quality assurance/quality control data.
 - f. The disposition and volume of all wastes generated.

Please be advised that OCD approval does not relieve Rhombus of responsibility if the proposed work plan fails to adequately remediate contamination related to Rhombus' activities. In addition, OCD approval does not relieve Rhombus of responsibility for compliance with any other federal, state or local laws and regulations. If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office
Randy Offield, Allstate Environmental Services, LLC
Myra Meyers, State Land Office

Olson, William

From: ALLSTATEENV@aol.com
Sent: Tuesday, February 26, 2002 11:24 AM
To: wolson@state.nm.us
Subject: Summary of Activities - Rhombus NW Eumont, Monument, N.M.



Rhombus NW
Eumont 2-6-02.ZIP

Mr. Olson,

attached to this note are 2 sketches of the Rhombus site: one dated the 6th of Feb., the other dated the 21st of Fe., and a written summary with a short paragraph about the work to be done.

Any questions or concerns may be addressed to Bobby Blackwood with Allstate Environmenal Services at 505-631-3744.

regards,

Hamp Kerby for Bobby Blackwood

Summary of Remediation Activities at
Rhombus NW Eumont Flowline Spill
As of 2-22-02
From Allstate Environmental Services

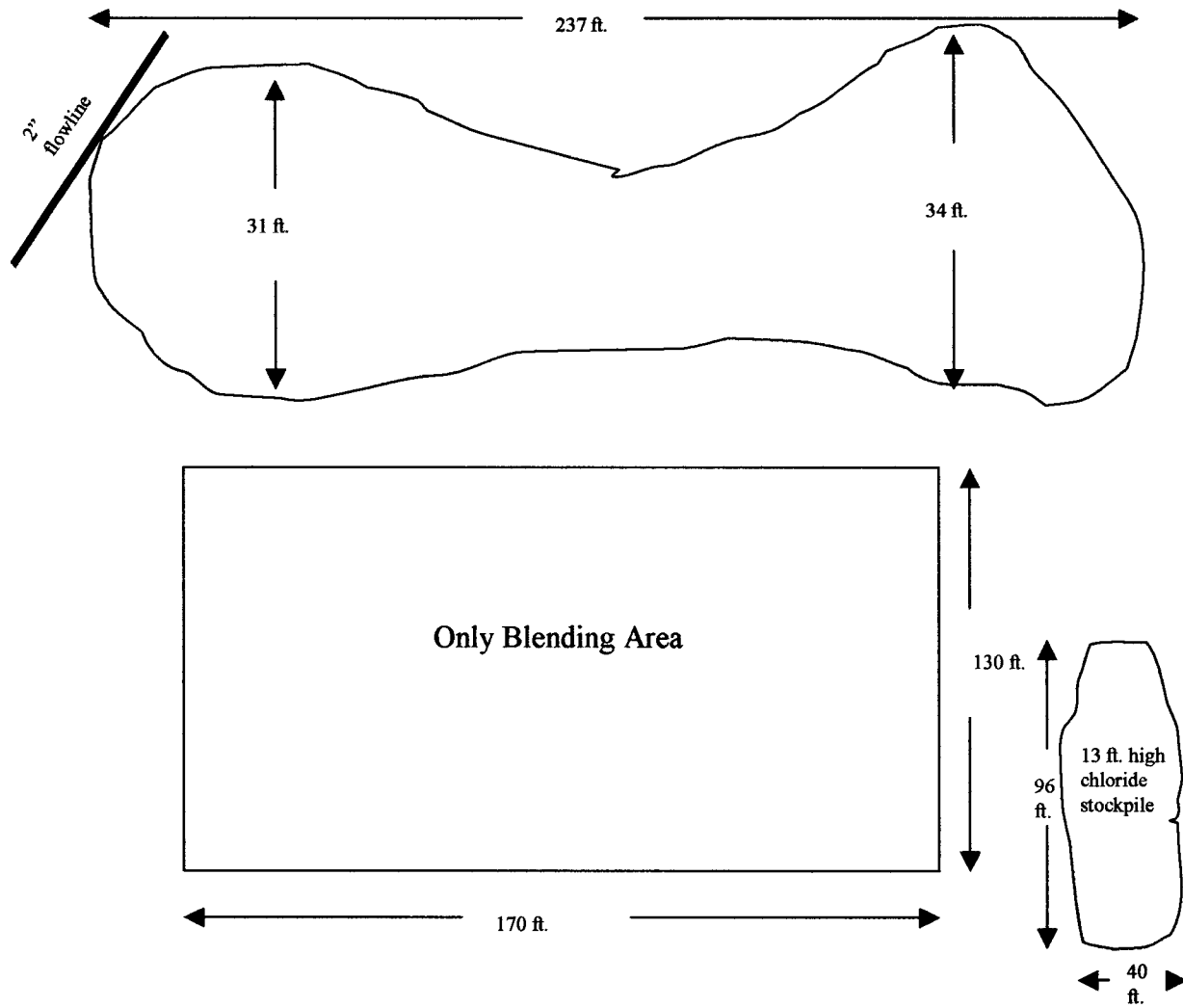
Excavated all hydrocarbon- contaminated soils and stock piled on site. Accumulated 1,498 cubic yards of hydrocarbon soil.

After all hydrocarbon- contaminated soil was removed from the effected area, began removal of chloride-contaminated soil. After reaching a depth of 25 ft. on east and west ends and 12 ft. in central area, chloride levels were below required level of 274 ppm. All chloride-contaminated soil was stockpiled on site.

At that point particlization (shredding) of the soil began. After shredding soil to remove rocks, a C-138 was approved by Paul Sheeley to haul hydrocarbon-contaminated soil to C&C Landfarm. After removal of hydrocarbon soil from the site, we began blending clean top soil with chloride-contaminated soil. The plan is to blend approx 1500 cy of clean soil with chloride soil to reach a level below 274 ppm chlorides. Any remaining chloride-conaminated soil will be hauled to an approved landfill.

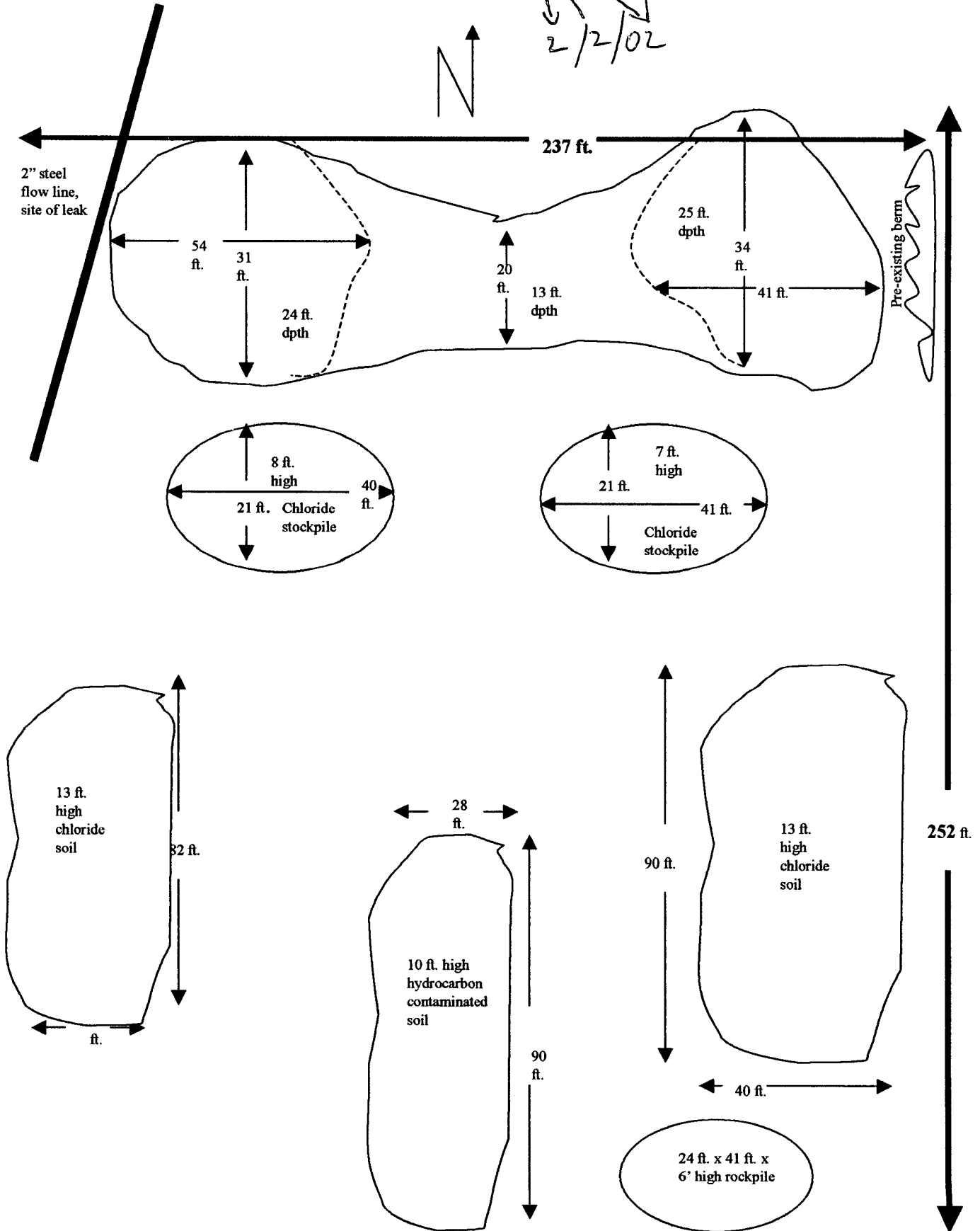
A berm on the east end of the depression where the spill was contained will be built Friday the 22nd of February. After excavation is backfilled, a 1-1/2 to 2 ft. cap of clean soil will be placed over the excavated area. All effected areas will then be re- vegetated to State Land Office Specifications.

Sketch of Rhombus NW Eumont
Remediation Site as of 2-21-02



Sketch of Rhombus NW Eumont
Remediation site as of 6-6-01

2/2/02



Olson, William

From: Sheeley, Paul
Sent: Thursday, February 21, 2002 2:04 PM
To: Olson, William



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12. 19. 2001

























