

1R - 358

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2003-2001

**Martin, Ed**

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**To:** Sheeley, Paul  
**Subject:** Amerada Hess NMGSAU Battery No. 67 (May Love Battery)

I have a letter from Sam Small referring to a closure request for this site dated 7/7/03. Do you have a copy of this request? Is this something you and/or Larry is handling in the District?

*Ed Martin*

New Mexico Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis  
Santa Fe, NM 87505  
Phone: 505-476-3492  
Fax: 505-476-3471

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 432/758-6741  
FAX 432/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
432/758-6700

August 6, 2003

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0360 0003 1887 7858**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 North French Dr,  
Hobbs, New Mexico 88240

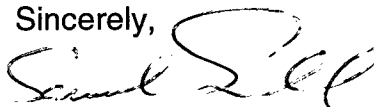
RE: **ENV-STUDIES, SURVEYS & REPORTS** 1R-358  
SITE REMEDIATION  
NMGSAU Battery No. 67 (May Love Battery)  
SE ¼, SE ¼, Sec 32, T-19S, R-37E, Lea County

Dear Mr. Sheeley:

Pursuant to your request of July 1, 2003, attached are the latest analytical results on samples collected from the monitor wells located at the abandoned NMGSAU Battery No. 67 (Chevron May Love) site. The results indicate that there is no hydrocarbon contamination in the water sampled from any of the wells. Chloride concentrations in monitor wells 1 (up-dip well) and 4 are slightly elevated. The analytical results are consistent with the previous sampling event on October 17, 2001, which are also included in the attached table No 1. The ETGI technician was unable to collect a sample from beneath the east side of the excavation due to the presence of excessive caliche. An attempt to collect a sample will be made during the backfill operation.

AHC is requesting approval of the closure plan submitted to the NMOCD on July 7, 2003 so that arrangements can be made with the landowner to move this project forward. If you have any questions, please contact the undersigned at 432-758-6741 or at the letterhead address.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD – Santa Fe  
Houston Environmental File  
PB Environmental File  
Monument Area File

**Groundwater Analyses (TPH)  
NMGSAU Battery No.67  
(Chevron May Love)**

Sample Location	Sample Date	Benzene	Toluene	Ethyl-Benzene	Xylene	Chloride
MW - 1	07/08/2003	< 0.001	< 0.001	< 0.001	0.002	266
MW - 2	07/08/2003	< 0.001	< 0.001	< 0.001	< 0.001	248
MW - 3	07/08/2003	< 0.001	< 0.001	< 0.001	0.001	186
MW - 4	07/08/2003	< 0.001	< 0.001	< 0.001	< 0.001	257
MW - 1	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	266
MW - 2	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	248
MW - 3	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	213
MW - 4	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	301

# ANALYTICAL REPORT

## Prepared for:

**Camille Reynolds  
Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, NM 88240**

**Project:** Chevron Maylove

**PO#:** AHL-1205R

**Order#:** G0306916

**Report Date:** 07/14/2003

## Certificates

**US EPA Laboratory Code TX00158**

## ENVIRONMENTAL LAB OF TEXAS

### SAMPLE WORK LIST

Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, NM 88240  
505/397/4701

Order#: G0306916  
Project:  
Project Name: Chevron Maylove  
Location: None Given

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

<u>Lab ID:</u>	<u>Sample :</u>	<u>Matrix:</u>	<u>Date / Time</u> <u>Collected</u>	<u>Date / Time</u> <u>Received</u>	<u>Container</u>	<u>Preservative</u>
0306916-01	MW-1	WATER	7/8/03 9:20	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-02	MW-2	WATER	7/8/03 9:31	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-03	MW-3	WATER	7/8/03 9:45	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-04	MW-4	WATER	7/8/03 10:00	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Camille Reynolds  
Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, NM 88240

Order#: G0306916  
Project:  
Project Name: Chevron Maylove  
Location: None Given

Lab ID: 0306916-01  
Sample ID: MW-1

### 8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0006126-02		7/12/03 15:36	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	0.002	0.001
o-Xylene	0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	94%	80	120
Bromofluorobenzene	95%	80	120

Lab ID: 0306916-02  
Sample ID: MW-2

### 8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0006126-02		7/10/03 1:00	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	109%	80	120
Bromofluorobenzene	99%	80	120

DI. = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 1 of 3

# ENVIRONMENTAL LAB OF TEXAS

## ANALYTICAL REPORT

Cassile Reynolds  
Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, NM 88240

Order#: G0306916  
Project:  
Project Name: Chevron Maylove  
Location: None Given

Lab ID: 0306916-03  
Sample ID: MW-3

### 8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0006126-02		7/12/03 15:58	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	96%	80	120
Bromofluorobenzene	96%	80	120

Lab ID: 0306916-04  
Sample ID: MW-4

### 8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0006126-02		7/10/03 12:10	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	108%	80	120
Bromofluorobenzene	101%	80	120

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 2 of 3



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## ENVIRONMENTAL LAB OF TEXAS

### ANALYTICAL REPORT

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Camille Reynolds  
Environmental Technology Group, Inc.  
2540 W. Mariand  
Hobbs, NM 88240

Order#: G0306916  
Project:  
Project Name: Chevron Maylove  
Location: None Given

Approval:

Celcy D. Keene 07/14/03

Date

Randall K. Tuttle, Lab Director, QA Officer

Celcy D. Keene, Org. Tech. Director

Jeanne McMurrey, Inorg. Tech. Director

Sandra Biczugbe, Lab Tech.

Sara Molina, Lab Tech.

## ENVIRONMENTAL LAB OF TEXAS

### ANALYTICAL REPORT

Camille Reynolds  
Environmental Technology Group, Inc.  
2540 W. Marland  
Hobbs, NM 88240

Order#: G0306916  
Project:  
Project Name: Chevron Maytove  
Location: None Given

Lab ID: 0306916-01  
Sample ID: MW-1

#### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	266	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-02  
Sample ID: MW-2

#### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	248	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-03  
Sample ID: MW-3

#### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	186	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-04  
Sample ID: MW-4

#### Test Parameters

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Dilution Factor</u>	<u>RL</u>	<u>Method</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Chloride	257	mg/L	1	5.00	9253	7/9/03	SB

Approval:

*Coley D. Keene* 07/14/03  
Rafand K. Tuttle, Lab Director, QA Officer  
Coley D. Keene, Org. Tech. Director  
Jeanne McMurrey, Inorg. Tech. Director  
Sandra Biczugbc, Lab Tech.  
Sara Molina, Lab Tech.

Date

# ENVIRONMENTAL LAB OF TEXAS

## QUALITY CONTROL REPORT

8021B/5030 BTEX

Order#: G0306916

<b>BLANK</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/L		0006126-02			<0.001		
Toluene-mg/L		0006126-02			<0.001		
Ethylbenzene-mg/L		0006126-02			<0.001		
p/m-Xylene-mg/L		0006126-02			<0.001		
o-Xylene-mg/L		0006126-02			<0.001		
<b>MS</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/L		0306927-01	0	0.1	0.101	101.1%	
Toluene-mg/L		0306927-01	0	0.1	0.104	104.1%	
Ethylbenzene-mg/L		0306927-01	0	0.1	0.109	109.1%	
p/m-Xylene-mg/L		0306927-01	0	0.2	0.221	110.5%	
o-Xylene-mg/L		0306927-01	0	0.1	0.106	106.1%	
<b>MSD</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/L		0306927-01	0	0.1	0.103	103.1%	2.1%
Toluene-mg/L		0306927-01	0	0.1	0.107	107.1%	2.8%
Ethylbenzene-mg/L		0306927-01	0	0.1	0.112	112.1%	2.7%
p/m-Xylene-mg/L		0306927-01	0	0.2	0.229	114.5%	3.6%
o-Xylene-mg/L		0306927-01	0	0.1	0.112	112.1%	5.5%
<b>SRM</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Benzene-mg/L		0006126-05		0.1	0.110	110.1%	
Toluene-mg/L		0006126-05		0.1	0.114	114.1%	
Ethylbenzene-mg/L		0006126-05		0.1	0.111	111.1%	
p/m-Xylene-mg/L		0006126-05		0.2	0.233	116.5%	
o-Xylene-mg/L		0006126-05		0.1	0.117	117.1%	

# ENVIRONMENTAL LAB OF TEXAS

## QUALITY CONTROL REPORT

### Test Parameters

Order#: G0306916

<b>BLANK</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0006108-01			<5.00		
<b>MS</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0306916-01	266	500	762	99.2%	
<b>MSD</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0306916-01	266	500	753	97.4%	12%
<b>SRM</b>	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0006108-04		5000	4960	99.2%	

# CHAIN-OF-CUSTODY

Send Reports To:

Company Name: Camille Regals

Address: 2000 N. 1st St.

City: St. Louis State: MO Zip: 63102

Phone: (314) 397-4701 Fax: (314) 397-4701

WWW.ANALYSYSINC.COM

Bill to (if different):

Company Name: Camille Regals

Address: 2000 N. 1st St.

City: St. Louis State: MO Zip: 63102

Phone: (314) 397-4701 Fax: (314) 397-4701

ANALYSIS INC.

3512 Montpelier Drive, Austin, TX 787-  
Phone: (512) 685-5880 Fax: (512) 685-7-  
2209 N. P.E.D., Ste N, Corpus Christi, TX 77-  
Phone: (361) 289 6381 Fax: (361) 289-08

Analyses Requested (1)

Please attach explanatory information as req

Each Sample must be conditioned with lab mgr.:

Prep. Name: John Doe Access Sampler: John Doe

Client Sample No.	Description Identification	Date Sampled	Time Sampled	No. of Containers	Soil	Water	Waste	Lab I.D. #	Comments
01	MWC-1	7-8-03	9:20	3		X			
02	MWC-2	7-8-03	9:31	3		X			
03	MWC-3	7-8-03	9:45	3		X			
04	MWC-4	7-8-03	10:00	3		X			

0306916

Sample Relinquished By

Sample Received By

Name	Affiliation	Date	Time	Name	Affiliation	Date	Time
<u>John Doe</u>	<u>AnalSys, Inc.</u>	<u>7-8-03</u>	<u>12:15</u>	<u>John Doe</u>	<u>AnalSys, Inc.</u>	<u>7-8-03</u>	<u>12:15</u>

40ml Plastic 4.0°C

Understanding of above described samples to AnalySys, Inc. for analytical testing constitutes agreement by Buyer/sampler to AnalySys, Inc.'s standard terms.

NMGSAU Battery No 67

From: Bayliss, Randy  
Sent: Thursday, June 13, 2002 2:59 PM  
To: 'Small, Sam'  
Subject: NMGSAU Battery No 67

We will consider in-situ or on site remediation.

As you've indicated, in-situ remediation will need some form of enhancement or application of technology for effective treatment. Use of chemical or organic fertilizers, passive aeration systems, and addition of catalysts have been approved and seen to work in similar projects.

Liners at the bottom of excavations are less effective and more expensive to install than caps over the top of backfilled material. Three feet of clean fill over the cap should be considered.

If you want to stick with the OCD guidelines and 100 ppm TPH and in-situ remediation, please provide a rough estimate of how long it'll take to achieve the cleanup level. I understand this is a rough estimate, and might be best described in general terms, like "more than five and less than ten years."

If you want to propose alternate cleanup levels, please provide a rational basis for those levels using some sort of scientific approach or model.

Sampling "ground water" from excavations is not a preferred method, since exposure and aeration will allow for escape of volatile compounds. Exposed water in pits is also vulnerable to contamination from oily soils sloughing off of sidewalls and from leaks from equipment. Nevertheless, we'd like to see your sample results.

We'd also like to see ground water monitoring from properly installed and developed wells located so as to define the extent of contamination around the source of the release site.

I appreciate that you have been cleaning up old pits sites on a regular maintenance schedule. However, this is an incident where the release may endanger the environment (because of the closeness to ground water) or there is a reasonable probability the release could be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). Therefore, if no ground water contamination is found, we can proceed along the lines of a Rule 116 D CORRECTIVE ACTION. So, OCD will require that you submit a work plan detailing your methods of remediation and monitor well locations.

If you have time next week when you're in town for the chlorides working group meeting, we could get together and discuss this further. I think it's important to go through the review-and-approval process for this type of corrective action, especially when there might be due diligence issues or third-party disputes.

After we meet, I'll be preparing a more official letter outlining the work plan requirements.

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

From: Small, Sam [mailto:SSmall@Hess.com]  
Sent: Wednesday, June 05, 2002 9:18 AM  
To: 'Bayliss, Randy'  
Cc: Baker, Jay; Kritter, Kurt  
Subject: RE: NMGSAU Battery No 67

I am not sure where we are going with this. We had originally planned to line the bottom of the excavation with 2-3 feet of compacted clay and back fill with the material on site, remediated to 1500 ppm TPH or less, pursuant to approval by the OCD. Samples from the spoils pile were analyzed; TPH concentrations were between 1000 and 1100 ppm TPH. We then received a letter from OCD rescinding the approval of the 1500 ppm threshold and indicating that we would have to use backfill which conformed to the 100 ppm TPH guideline. The landowner wants the spoils pile hauled off and 'clean' soil (purchased from him) hauled in, but AHC does not wish to do so. We are currently considering remediation on site. Again, the landowner does not want us to use any of the site for landspreading, so we are reviewing methods for enhancing the remediation process in the spoil pile. The ground water sampled at the excavation and in the monitor wells did not evidence any hydrocarbon contamination. We will continue to monitor the spoil pile for decreases in TPH concentrations, however, until we settle on the remediation technology we are going to employ, I am not too sure what additional sampling has to offer.

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

From: Bayliss, Randy [mailto:RBayliss@state.nm.us]  
Sent: Wednesday, June 05, 2002 8:53 AM  
To: Samuel Small (E-mail)  
Subject: NMGSAU Battery No 67

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

May 28, 2002

Bill Olson  
NMOCD  
P.O. Box 6429  
Santa Fe, NM 87504-6429

**Re: 1831 Mobile Road, Hobbs**

Dear Mr. Olson,

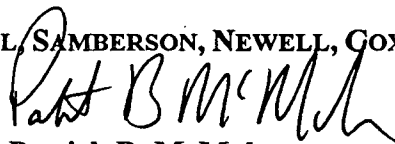
I have been in contact with Mr. Gary Johnson, owner of 1831 Mobile Road. Mr. Johnson informs me that you are making arrangements to conduct a sampling event at this Mobile Road property. Please advise me of your sampling date so that I may arrange to split sample on behalf of Mr. Johnson.

I look forward to discussing this matter with you.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

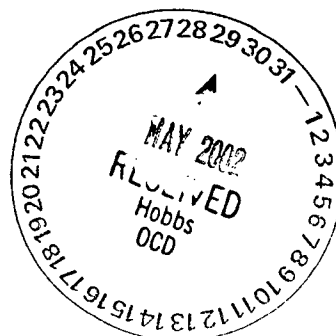
By:



**Patrick B. McMahon**

PBM:dr

cc: Gary Johnson  
✓Chris Williams, Hobbs OCD



*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

May 28, 2002

Chris Williams  
NMOCD  
1625 N. French Dr.  
Hobbs, NM 88240

**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Williams,

Thank you for taking time on May 23, 2002, to meet with Mr. Ed Johnston and myself. As we discussed, Mr. Johnston is concerned that Amerada Hess has not properly remediated the former tank battery site located on his land. As you requested, I have provided your office with a copy of the lab results from our January 2002 sampling event. In addition, I have attached correspondence to Mr. Randy Bayliss, of the Santa Fe OCD office, regarding your identification of him as the OCD representative that will be handling this matter.

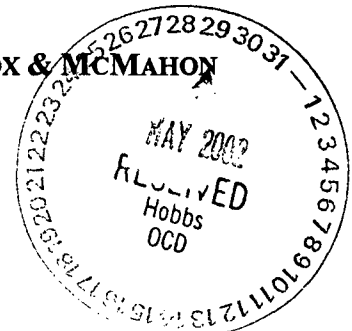
I look forward to receiving your summary of the activity that has taken place since Mr. Sheeley's December 20, 2001 letter to Amerada Hess. If you have any questions, please do not hesitate to call.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

By:

  
Patrick B. McMahon

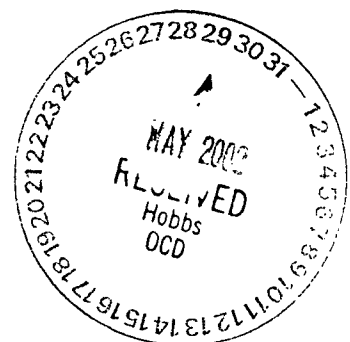




PBM:cd

Enclosure

pc: Ed Johnston  
Randy Bayliss



*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

May 28, 2002

Randy Bayliss  
NMOCD  
P.O. Box 6429  
Santa Fe, NM 87505

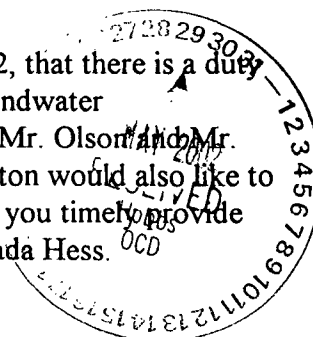
**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Bayliss,

On Thursday, May 23, 2002, Mr. Ed Johnston and myself met with Chris Williams and Gary Wink, of the Hobbs OCD office, regarding the above referenced battery location. Mr. Williams informed me that you are the OCD representative that will be handling this matter. Unless you contact me otherwise, it will be my understanding that you are, in fact, the OCD representative.

As you and I have already discussed, Mr. Johnston is very interested in seeing that Amerada Hess properly remediates the former battery site located on his fee land. To this end, I am requesting that you copy my office all correspondence that is generated by the OCD, and by Amerada Hess. In addition, I am requesting that you timely inform us of all developments and seek Mr. Johnston's input before any decision is made regarding the investigation and remediation of this site.

It is our position, based upon the lab results obtained in January 2002, that there is a duty for Amerada Hess to undertake further investigation as to the extent of groundwater contamination at the site. Copies of these lab results have been provided to Mr. Olson and Mr. Williams and have been enclosed with this letter for your review. Mr. Johnston would also like to participate in any and all future sampling events at this site and requests that you timely provide him with notice of any sampling events scheduled by the OCD and/or Amerada Hess.



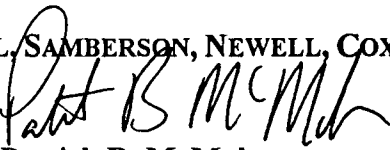
Amerada Hess encountered groundwater during the remediation of this battery site on October 5, 2001. Since then, an oily sheen has been visible on the water in the bottom of the pit. Nearly eight months have passed and this problem has not been adequately addressed by Amerada Hess or the OCD. To date, Mr. Johnston has been very patient with Amerada Hess and the OCD. However, he has asked me to identify all options that are available to him that can be used to insure that this matter is resolved.

I look forward to working with you on this matter.

Sincerely,

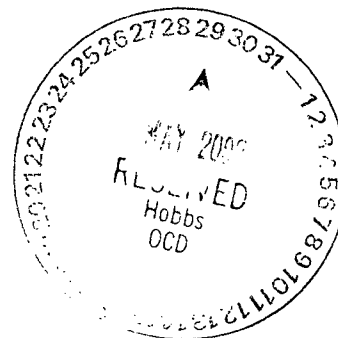
HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:

  
Patrick B. McMahon

PBM:cd

pc: Ed Johnson  
✓ Chris Williams



*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

January 24, 2002

Bill Olson  
P. O. Box 6429  
Santa Fe NM 87504-6429

**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Olson,

As per our conversation on January 23, 2002, please find enclosed copies of correspondence sent to the Hobbs OCD by Amerada and my correspondence to Mr. Paul Sheeley regarding the above referenced matter. As of this date Amerada has continued to refuse to submit a copy of all their sample to results to Mr. Johnston. In addition, the Hobbs OCD office has not responded to my December 4, 2001 letter. As I have set forth in the enclosed letter, Mr. Johnston is interested in having Amerada properly remediate this property. However, the longer Mr. Johnston waits for a copy of the sample results from Amerada the more frustrated he becomes. Mr. Sheeley's utter refusal to address the legitimate concerns of my client has only made matters worse.

The only word Mr. Johnston has received from Amerada has been their repeated request to cover the water in the bottom of the pit with topsoil in order to protect the well being of children who happen to find themselves out in the middle of my client's cow pasture. Mr. Johnston has instructed Amerada not to cover the bottom of the pit. I have suggested that if Amerada was interested in the safety of those children, which my client has never seen, they would install a chainlink fence around the pit instead of trying to cover-up their water problem. As of this date, the pit remains unfenced.

Also, enclosed are black and white copies of color photographs identifying the groundwater at the bottom of the pit and the sheen on the water surface and the water sample

Letter to Bill Olson  
NMOCD  
January 24, 2002  
Page two.

results from Cardinal Laboratories. These results confirm that there is a very serious contamination problem with the water under Mr. Johnston's property. I can tell you that immersing your hand into the water at the bottom of the pit results in a heavy, oily film on your skin.

As of this date, these are the facts relating to this problem:

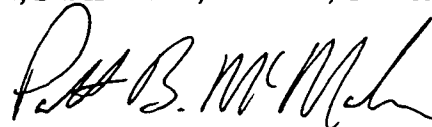
Amerada has hit groundwater in their excavation of an old Amerada tank battery. The groundwater is contaminated. Amerada has refused to discuss this matter with my client. Amerada has no plans to remediate groundwater at the site. Amerada's solution is to cover up their problem with red-bed clay. The OCD has been notified of this problem. The OCD refuses to discuss this matter with my client. The OCD has not forced Amerada to address the groundwater issue. The OCD is apparently satisfied with Amerada's plan to cover-up contaminated groundwater.

The Oil Conservation Division, through the Oil and Gas Act (N.M.S.A. §70-2-1 through 70-2-38 [1995 Repl. Pamph.]), is statutorily charged with prevention of waste and the protection of public health and the environment. My client and I are available the week of January 28, 2002 and would like to visit with you on site. I look forward to hearing from you.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

By:



**Patrick McMahon**

PBM.dr  
Enclosure  
pc w/encl: Ed Johnston



State of New Mexico  
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT  
Santa Fe, New Mexico 87505

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

1415

Date

2/4/02

Originating Party

Bill Olson - Enviro Bureau

Other Parties

Pat McMahon - Heibel, Sambersen,  
Navell, Cox & McMahon  
(505) 396-5303

Subject

Helge, Blas Well and  
Amerade Hess - NMBSAU Battery #67

Discussion

Told him how, contacted Ms. Blas. No organics detected in water.  
OCD still awaiting metals and gen chem results

Don't know status of Amerade Hess case. Need to contact  
Hobbs. No water wells in vicinity of the site (per McMahon)

Conclusions or Agreements

- OED will send Ms. Blas explanation of results when all have been received
- ~~Will~~ Will contact Hobbs to determine status of Amerade Hess case

Distribution

Signed

Bill Olson

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

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FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

January 24, 2002

**RECEIVED**

**JAN 29 2002**

Bill Olson  
P. O. Box 6429  
Santa Fe NM 87504-6429

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Olson,

As per our conversation on January 23, 2002, please find enclosed copies of correspondence sent to the Hobbs OCD by Amerada and my correspondence to Mr. Paul Sheeley regarding the above referenced matter. As of this date Amerada has continued to refuse to submit a copy of all their sample to results to Mr. Johnston. In addition, the Hobbs OCD office has not responded to my December 4, 2001 letter. As I have set forth in the enclosed letter, Mr. Johnston is interested in having Amerada properly remediate this property. However, the longer Mr. Johnston waits for a copy of the sample results from Amerada the more frustrated he becomes. Mr. Sheeley's utter refusal to address the legitimate concerns of my client has only made matters worse.

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Letter to Bill Olson  
NMOCD  
January 24, 2002  
Page two.

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As of this date, these are the facts relating to this problem:

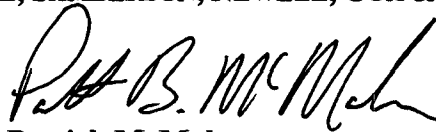
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The Oil Conservation Division, through the Oil and Gas Act (N.M.S.A. §70-2-1 through 70-2-38 [1995 Repl. Pamph.]), is statutorily charged with prevention of waste and the protection of public health and the environment. My client and I are available the week of January 28, 2002 and would like to visit with you on site. I look forward to hearing from you.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

By:



**Patrick McMahon**

PBM:dr  
Enclosure  
pc w/encl: Ed Johnston



## Bayliss, Randy

---

**From:** Small, Sam [SSmall@Hess.com]  
**Sent:** Wednesday, June 05, 2002 9:18 AM  
**To:** 'Bayliss, Randy'  
**Cc:** Baker, Jay; Krieter, Kurt  
**Subject:** RE: NMGSAU Battery No 67

I am not sure where we are going with this. We had originally planned to line the bottom of the excavation with 2-3 feet of compacted clay and back fill with the material on site, remediated to 1500 ppm TPH or less, pursuant to approval by the OCD. Samples from the spoils pile were analyzed; TPH concentrations were between 1000 and 1100 ppm TPH. We then received a letter from OCD rescinding the approval of the 1500 ppm threshold and indicating that we would have to use backfill which conformed to the 100 ppm TPH guideline. The landowner wants the spoils pile hauled off and 'clean' soil (purchased from him) hauled in, but AHC does not wish to do so. We are currently considering remediation on site. Again, the landowner does not want us to use any of the site for landspreading, so we are reviewing methods for enhancing the remediation process in the spoil pile. The ground water sampled at the excavation and in the monitor wells did not evidence any hydrocarbon contamination. We will continue to monitor the spoil pile for decreases in TPH concentrations, however, until we settle on the remediation technology we are going to employ, I am not too sure what additional sampling has to offer.

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

**From:** Bayliss, Randy [mailto:RBayliss@state.nm.us]  
**Sent:** Wednesday, June 05, 2002 8:53 AM  
**To:** Samuel Small (E-mail)  
**Subject:** NMGSAU Battery No 67

The Hobbs district office has asked me to handle this project. It's looks like some more sampling might be in order. What are you thoughts?

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. McMAHON

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FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

February 6, 2002

Bill Olson  
NMOCD  
P.O. Box 6429  
Santa Fe, NM 87504-6429

**Re: Groundwater Standards for TPH**

Dear Mr. Olson,

As per our conversation on February 4, 2002, I am writing this letter to you to confirm matters we discussed. It is my understanding that the Oil Conservation Division has taken the following position regarding Total Petroleum Hydrocarbon (TPH) in groundwater:

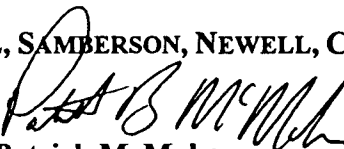
1. The New Mexico Groundwater Standards do not include a standard for TPH.
2. There are no New Mexico statutes, rules and/or regulations that set forth a groundwater standard for TPH.
3. Since there are no New Mexico groundwater standards for TPH, groundwater that contains TPH is not contaminated by that TPH.
4. Therefore, the OCD will be taking no action regarding groundwater that contains TPH.

If the foregoing is incorrect, please contact me within ten (10) days of the date of this letter in writing setting forth the OCD's position on this subject. Otherwise, it will be my understanding that the OCD's positing on TPH in groundwater is, and will continue to be, as set forth above.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:

  
Patrick McMahon

PBM:dr

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

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F.L. HEIDEL  
(1913-1985)

RECEIVED

May 28, 2002

**MAY 30 2002**  
Environmental Bureau  
Oil Conservation Division

Chris Williams  
NMOCD  
1625 N. French Dr.  
Hobbs, NM 88240

**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Williams,

Thank you for taking time on May 23, 2002, to meet with Mr. Ed Johnston and myself. As we discussed, Mr. Johnston is concerned that Amerada Hess has not properly remediated the former tank battery site located on his land. As you requested, I have provided your office with a copy of the lab results from our January 2002 sampling event. In addition, I have attached correspondence to Mr. Randy Bayliss, of the Santa Fe OCD office, regarding your identification of him as the OCD representative that will be handling this matter.

I look forward to receiving your summary of the activity that has taken place since Mr. Sheeley's December 20, 2001 letter to Amerada Hess. If you have any questions, please do not hesitate to call.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

By:

  
Patrick B. McMahon

PBM:cd

Enclosure

pc: ~~Ed Johnston~~  
✓ Randy Bayliss

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
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F.L. HEIDEL  
(1913-1985)

**RECEIVED**

**MAY 30 2002**

Environmental Bureau  
Oil Conservation Division

May 28, 2002

Randy Bayliss  
NMOCD  
P.O. Box 6429  
Santa Fe, NM 87505

**Re: Amerada Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.  
Lea County, New Mexico**

Dear Mr. Bayliss,

On Thursday, May 23, 2002, Mr. Ed Johnston and myself met with Chris Williams and Gary Wink, of the Hobbs OCD office, regarding the above referenced battery location. Mr. Williams informed me that you are the OCD representative that will be handling this matter. Unless you contact me otherwise, it will be my understanding that you are, in fact, the OCD representative.

As you and I have already discussed, Mr. Johnston is very interested in seeing that Amerada Hess properly remediates the former battery site located on his fee land. To this end, I am requesting that you copy my office all correspondence that is generated by the OCD, and by Amerada Hess. In addition, I am requesting that you timely inform us of all developments and seek Mr. Johnston's input before any decision is made regarding the investigation and remediation of this site.

It is our position, based upon the lab results obtained in January 2002, that there is a duty for Amerada Hess to undertake further investigation as to the extent of groundwater contamination at the site. Copies of these lab results have been provided to Mr. Olson and Mr. Williams and have been enclosed with this letter for your review. Mr. Johnston would also like to participate in any and all future sampling events at this site and requests that you timely provide him with notice of any sampling events scheduled by the OCD and/or Amerada Hess.

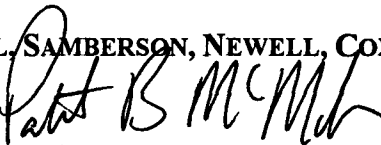
Amerada Hess encountered groundwater during the remediation of this battery site on October 5, 2001. Since then, an oily sheen has been visible on the water in the bottom of the pit. Nearly eight months have passed and this problem has not been adequately addressed by Amerada Hess or the OCD. To date, Mr. Johnston has been very patient with Amerada Hess and the OCD. However, he has asked me to identify all options that are available to him that can be used to insure that this matter is resolved.

I look forward to working with you on this matter.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:

  
Patrick B. McMahon

PBM:cd

pc: Ed Johnson  
Chris Williams

TABLE 1

GROUND WATER CHEMISTRY  
HISTORICAL TABLE

EOTT ENERGY CORPORATION  
RED BYRD NO. 2  
LEA COUNTY, NEW MEXICO  
ETGI PROJECT # EOT 2051C

*All concentrations are in mg/L*

SAMPLE LOCATION	SAMPLE DATE	SW 846-8260b			
		BENZENE	TOLUENE	ETHYL- BENZENE	TOTAL XYLENES
Excavation	10/29/01	0.246	0.452	0.147	0.428



**Environmental Lab of Texas, Inc.**

12508 West 14th Blvd  
Oklahoma Falls 79963

Phone: 916-523-1200  
Fax: 916-523-1713

**Office: Texas 78763**

Project Manager: Camille Reynolds

	Company Name
	<b>FBI</b>

Company Address: 2540 West Maryland

Hobbs, O M 5840  
 11/15/1914

605) AF-4982

Camille Ruggolds

Fax No. (506) 397-4701

---

Coc # 199

## CHAIN OF CUSTODY RECORD AND ANALYSIS REPORT

Project Name: ABC Chemicals May Love

Project #: **BK 12052**

Project Loc: Monument, nm

22

[illegible]

10/6/11      15th St. S.W.      Atlanta, Ga.

076 1066.11

0450 100511 Enmawall road

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
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LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

March 13, 2002

**RECEIVED**

**MAR 21 2002**

Environmental Bureau  
Oil Conservation Division

State of New Mexico  
Oil Conservation Division  
Environmental Division  
Randy Bayliss  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**Re: Amerada Hess Abandoned Battery Site Remediation March 13, 2002  
NMGSAU Battery No. 67  
Unit O, Section 32, Township 19 South, Range 37 East,  
NMPM, Lea County, New Mexico**

Dear Mr. Bayliss,

This firm represents Mr. Ed Johnston in regard to the above referenced remediation. Mr. Johnston is the fee owner of the surface estate affected by this activity.

According to Mr. William Olson, you are the OCD employee responsible for overseeing remediation efforts by Amerada Hess in and around Monument, New Mexico. Enclosed for your review is correspondence regarding my efforts on behalf of Mr. Johnston.

Please contact me at your earliest convenience so that we may discuss if, how and when Amerada Hess will be completing this remediation project. Likewise, we look forward to meeting with you on site if possible.

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

By:

  
Patrick B. McMahon

PBM:dr  
Enclosures  
cc: Ed Johnston

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

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F.L. HEIDEL  
(1913-1985)

March 28, 2002

Chris Williams  
NMOCD  
1625 N. French Dr.  
Hobbs, NM 88240

RECEIVED  
APR 02 2002  
Environmental Bureau  
Oil Conservation Division

**Re: Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit 0, Sec. 32, T-19S, R-37E**

Dear Mr. Williams,

On March 22, 2002, I had a conversation with Mr. Bayliss, Sante Fe OCD, regarding the above referenced matter. Mr. Bayliss faxed to me a number of pages of correspondence between Amerada and Mr. Sheeley. Enclosed for your review are three of the pages I received from Mr. Bayliss, namely an October 30, 2001 letter to Mr. Small, a November 30, 2001 letter to Mr. Sheeley and a December 3, 2001 letter to Mr. Small. According to Mr. Bayliss, contrary to the December 3, 2001 letter by Mr. Sheeley, Amerada's proposed closure plan of November 30, 2001 is not the closure plan that Amerada will use at the above referenced site. According to Mr. Bayliss, the November 30, 2001 closure plan has been rejected by OCD since Mr. Sheeley's December 3, 2001 letter. According to Mr. Bayliss, Mr. Small has agreed to reduce TPH levels in the backfill material to 100 ppm. If Mr. Bayliss is mistaken, or if I misunderstood, please contact me immediately.

As I have indicated in correspondence to Mr. Sheeley, Mr. Johnston is concerned that the above reference site is remediated properly. As of this date, none of the closure proposals from Amerada comply with the OCD Guidelines. In addition, I am unaware that either Amerada or the OCD has made any effort to address groundwater issues at the excavation site.

Mr. Johnston and I would like the opportunity to meet with you to discuss our concerns. Please feel free to call me to discuss this matter.

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 5, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N French Drive  
Hobbs, New Mexico 88240-1981

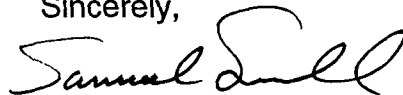
RE: **Abandoned Battery Site Remediation**  
NMGSAU Batt. 67 (May Lake)  
Unit O, Sec. 32, T-19S, R-37E  
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5<sup>th</sup>. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD – Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

---

October 25, 2001

**Delivered by Hand 10/26/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

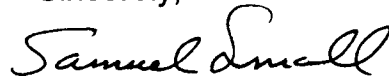
Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

↑ N

CHEVRON MRY LOVE

MW-1 DTW: 28.20

98'

Approx. 29 feet deep  
Approx. 29 feet deep point

Approx. 30 feet deep  
Approx. 30 feet deep

TANK BATTERY

164 x 87'

PIT

113 x 72

135'

18'

CALICHE ROAD

88'

209'

235'

102'

143'

117'

MW-4

DTW: 27.80

MW-2

DTW: 27.57

MW-3

DTW: 31.76

DTW - NOT corrected for elevation

NOT TO SCALE  
KEN DUTTON - ETGI

**NMGSAU BATTERY NO. 67**  
**ANALYTICAL RESULTS**  
**(PPM)**

	SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1	Groundwater from								
2	West Excavation	< 0.001	< 0.001	< 0.001	< 0.001			284	1158
3	Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001			266	
4	Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001			248	
5	Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001			213	
6	Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001			301	
7	Vadose Zone MW #1								
8	Sample at 30'					< 10	< 10	18	
9	Vadose Zone MW #2					< 10	< 10	24	
10	Sample at 30'					< 10	< 10	18	
11	Vadose Zone MW #3					< 10	< 10	24	
12	Sample at 25'					< 10	< 10	24	
13	Vadose Zone MW #4					< 10	< 10	24	
14	Sample at 25'					< 10	< 10	24	
15	Bottom of East								
16	Excavation	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
17	Bottom of West								
18	Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	



October 30, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMGSAU Battery No. 67 (Chevon May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is **hereby approved** under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [ TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perrimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

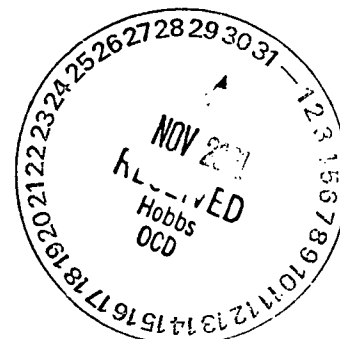
P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

November 30, 2001

**HAND DELIVRED 11/30/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

Samuel Small, PE  
Environmental Coordinator

Xc: NMOC Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

12- 4-01: 3:58PM; MONUMENT  
Dec 04 01 01:59p  
Dec 04 01 03:19p

505 393 1927

# 27 5  
p. 6

p. 5

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: CAMILLE KEYNOLDS  
2540 WEST MARLAND  
HOBBBS, NM 88240  
FAX: 505-397-1701

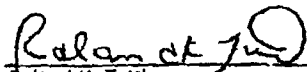
Sample Type: Soil  
Sample Condition: Intact/ Iced/ -0.5 deg C  
Project Name: AHC Chevron May Love  
Project #: AHC 1205R  
Project Location: Monument, NM

Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 11/29/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-02	East Pit Backfill 5-10'	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-03	Former Tank Batt. NW Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.090	0.089	0.093	0.192	0.089
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	90	89	93	96	89
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	0.061	0.257	0.418	0.143
SPIKE	0.089	0.090	0.101	0.198	0.097
SPIKE DUP	0.090	0.095	0.110	0.220	0.106
%EA	90	93	100	102	100
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1.12	5.52	9.42	12.5	9.42

METHODS: EPA SW 846-8021B, 5030

  
Ralanda K. Tuttle

12-04-01  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 2

12- 4-01: 3:58PM; MONUMENT  
DEC 04 01 03:00P  
Dec 04 01 03:19p

p.6

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: CAMILLE REYNOLDS  
2540 WEST MARLAND  
HOBBBS, NM 88240  
FAX: 505-397-4701

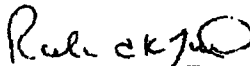
Sample Type: Soil  
Sample Condition: Intact/ Iced/ -0.5 deg C  
Project Name: AHC Chevron May Love  
Project #: AHC 1205R  
Project Location: Monument, NM

Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 12/02/01

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<10	41
0102098-02	East Pit Backfill 5-10'	<10	202
0102098-03	Former Tank Batt. NW Sidewall	<10	142

QUALITY CONTROL	483	586
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	97	117
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	499	638
SPIKE DUP	503	634
% EXTRACTION ACCURACY	106	123
BLANK	<10	<10
RPD	0.80	0.63

Methods: SW 846-8015M

  
Roland K. Tuttle

12-04-01  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 3

12- 4-01; 3:58PM; MONUMENT  
Dec 04 01 02:00p

:505 393 1927

# 4/ 5  
p. 8

Dec 04 01 03:19p

p. 7

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: CAMILLE REYNOLDS  
2540 WEST MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

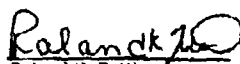
Sample Type: Soil  
Sample Condition: Intact/ Iced/ -0.5 deg C  
Project Name: AHC Chevron May Love  
Project #: AHC 1205R  
Project Location: Monument, NM

Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 12/03/01

ELT#	FIELD CODE	Chloride mg/kg
0102098-01	Former Tank Batt. Pit Bottom	66
0102098-02	East Pit Backfill 5-10'	18
0102098-03	Former Tank Batt. NW Sidewall	75

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	18
SPIKE	523
SPIKE DUP	523
% EXTRACTION ACCURACY	101
BLANK	<10
RPD	0.0

Methods: SW 846-8015M

  
Roland K. Tuttle

12-04-01  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1719

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 4



December 3, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMGSAU Battery No. 67 (Chevon May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The revised closure proposal referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation dated November 30, 2001 is **hereby approved**.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please feel free to write or call me at (505) 393-6161, x113 or email [psheeley@state.nm.us](mailto:psheeley@state.nm.us)

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

## LAW OFFICES

## HEIDEL, SAMBERSON, NEWELL, COX &amp; MCMAHON

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. MCMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NEW MEXICO 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

TELECOPY TRANSMITTAL SHEET

## CONFIDENTIALITY NOTE

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED BELOW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPY OF THIS TELECOPY IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TELECOPY IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS SET FORTH ABOVE VIA THE UNITED STATES POSTAL SERVICE.

\*\*\*\*\*

DATE:

12-4-01

TIME:

4:50pm

TO:

Paul Scheele  
Lou Wrotenberg  
\* Chris Williams

#

393-0720

#

476-3462

#

393-0720

RE:

Amerada-Hess / Ed Johnston

YOU SHOULD RECEIVE \_\_\_\_ PAGE(S) OF COPY, INCLUDING THIS COVER PAGE. PLEASE NOTIFY US IMMEDIATELY AT (505) 396-5303 IF NOT RECEIVED PROPERLY.

( ) FOR YOUR INFORMATION/RECORDS  
( ) AS WAS DISCUSSED  
☒ FOR YOUR REVIEW

( ) PER YOUR REQUEST  
( ) FOR YOUR COMMENTS  
( ) PLEASE CALL ME ABOUT THIS

If you have any questions, please do not hesitate to call.

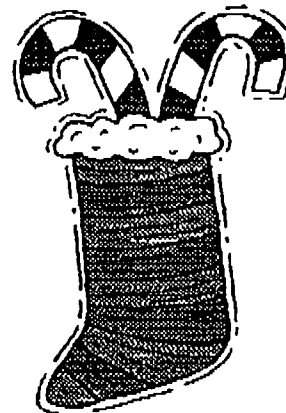
IF CHECKED ORIGINAL WILL BE FORWARDED TO YOU BY:  
( ) FEDERAL EXPRESS ( ) REGULAR MAIL

THANK YOU,

HEIDEL, SAMBERSON, NEWELL, COX &amp; MCMAHON

By:

Cheryl





476-3462

## LAW OFFICES

## HEIDEL, SAMBERSON, NEWELL, COX &amp; MCMAHON

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. MCMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

December 4, 2001

Paul Scheeley  
NMOCD  
1625 N. French Drive  
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit O, Section 32, Township 19 South, Range 37 East,  
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.

Letter to Paul Scheeley  
NMOCD  
December 4, 2001  
Page two.

*lawsuits*  
Your response to Mr. Johnston's concerns was that you do not get involved *in* between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:

  
Patrick B. McMahon

PBM:cd

pc: Ed Johnston  
Lori Wrotenbery  
Chris Williams

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

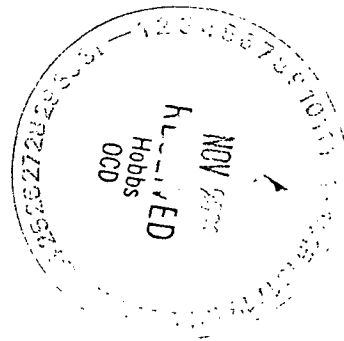
P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

November 9, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0360 0003 1887 7919**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Incidents and Releases-Pipeline Leak**  
UL-K-Sec8, T-19S, R-35E  
T. Anderson Lease  
Lea County, New Mexico  
Status Report

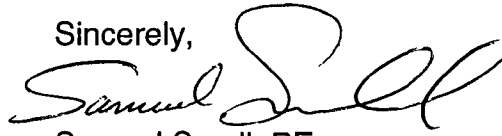


Dear Mr. Sheeley:

This letter will confirm my voice mail message left on November 8, 2001 advising the NMOCD that excavation activities at the subject site had encountered groundwater. The depth of excavation is approximately 30 feet. Vadose zone and groundwater samples were collected and submitted for analysis. Analytical results will be provided to the NMOCD when they are available.

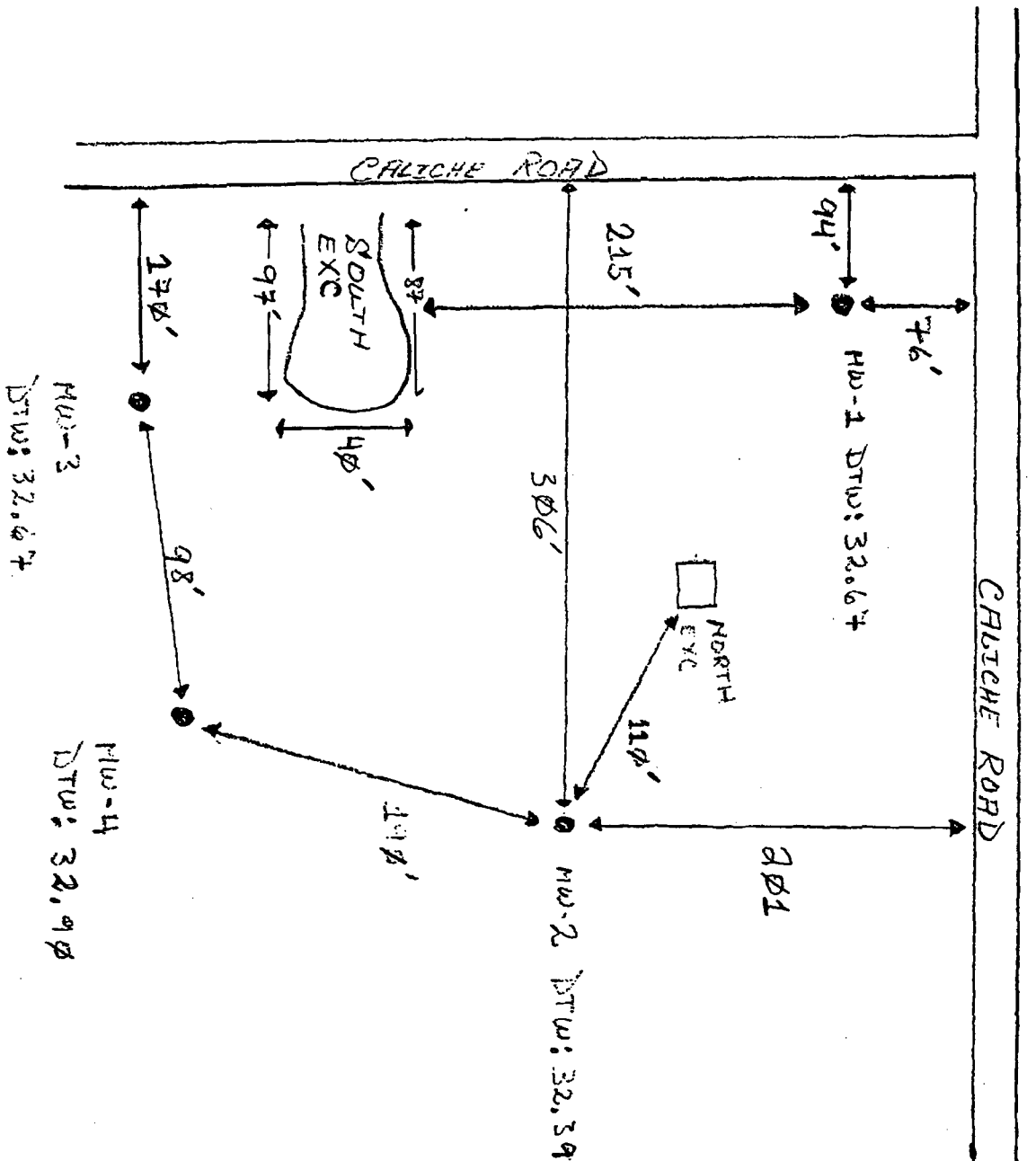
Pursuant to our letter of October 2, 2001, monitor wells were drilled at the site on October 10, 2001. A plat of the well locations and groundwater analyses are attached.

If you have any questions, please contact Mr. Rob Williams at 1-505-393-2144, ext. 103.

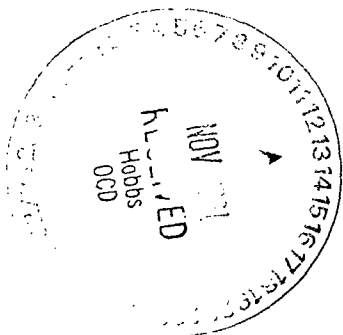
Sincerely,  
  
Samuel Small, PE  
Environmental Coordinator

Xc: Houston Environmental Files  
PBBU Environmental Files  
Monument Files

↑ N



T. ANDERSON



NOT TO SCALE  
K. DUTTON-ETGI

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 W. MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

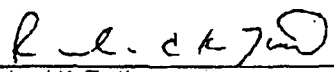
Sample Type: Water  
Sample Condition: Intact/ Iced/ HCl/ -1.0 deg C  
Project Name: T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

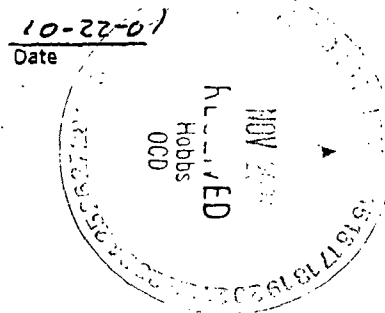
Sampling Date: 10/17/01  
Receiving Date: 10/17/01  
Analysis Date: 10/19/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101790-01	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-02	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-03	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-04	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001

QUALITY CONTROL	0.102	0.104	0.112	0.226	0.094
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	102	104	112	113	94
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	<0.001	<0.001	<0.001	<0.001
SPIKE	0.094	0.093	0.085	0.171	0.085
SPIKE DUP	0.092	0.091	0.088	0.177	0.087
%EA	94	93	85	86	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	2.15	2.17	3.47	2.30	2.32

METHODS: EPA SW 846-8021B, 5030

  
Ralend K. Tuttle



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 W. MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

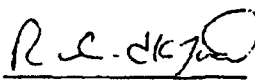
Sample Type: Water  
Sample Condition: Intact/ Iced/ -1.0 deg C  
Project Name: T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

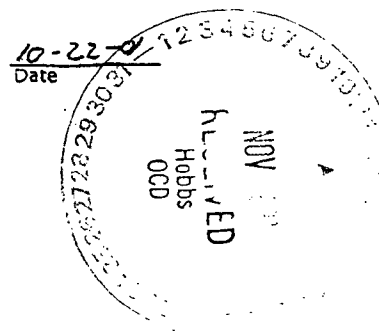
Sampling Date: 10/17/01  
Receiving Date: 10/17/01  
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/L
0101790-01	MW 1	532
0101790-02	MW 2	443
0101790-03	MW 3	549
0101790-04	MW 4	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	266
SPIKE	762
SPIKE DUP	771
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.17

Methods: SW 846-9253

  
Reiland K. Tuttle



**12600 West 1-20 East  
Odessa, Texas 79763**

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: KEN DUTTON

Project Name: T. ANDERSON

Company Name ETGI

Project #: AHC 1202R

Company Address: 2540 W MARLAND

Project Loc: Monument, NM

City/State/Zip: Hobbs NM 88240

अं  
०  
२

Telephone No. 505 397-4882

Fax No (505) 397-4701

Sampler Signature: 

FIELD CODE		Date Sampled	Time Sampled	No. of Containers	Preservative										Matrix				Analyze For:							
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20							
LAB. # (18B, 18B, 18B, 18B)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19							
0101790-01	MW 1	10/17/01	0830	3	Ice	HNO <sub>3</sub>	HCl	MnOH	H <sub>2</sub> SO <sub>4</sub>	Mono	Other (Specify)	Water	Sludge	Soil	Other (Specify)	TDS / CL / SAR / EC	TPM #18	TPM TX 1005/1008	TPM 6015M GR/V/DRO	Metals: As Ag Ba Cd Cr Pb Hg Sb	Volatiles	Semi-volatiles	STEX 8021B/8030	CHLORIDES	RUSH TAT (Pre-Schedule)	Standard "AT"
02	MW 2	↓	0845	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
03	MW 3	↓	0900	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
04	MW 4	↓	0915	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓

NOV 2001  
 RECEIVED  
 Hobbs  
 OCD

Special Instructions:

Received by:   
 Date: 10/17/01  
 Time: 1500

Received by:   
 Date: 10/17/01  
 Time: 1500

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 W. MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 3.0 deg C  
Project Name: AHC T. Anderson  
Project #: AMC 1203R  
Project Location: Monument, NM

Sampling Date: See Below  
Receiving Date: 10/18/01  
Analysis Date: 10/18/01

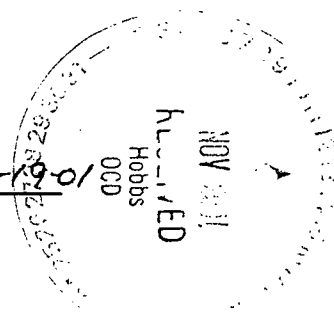
ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRG >C10-C28 mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	<10	28	10/11/01
0101798-02	MW-2 25'	<10	12	10/11/01
0101798-03	MW-3 25'	<10	16	10/12/01
0101798-04	MW-4 25'	<10	<10	10/12/01

QUALITY CONTROL	531	454
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	106	91
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	72	981
SPIKE	620	1530
SPIKE DUP	561	1370
% EXTRACTION ACCURACY	115	115
BLANK	<10	<10
RPD	9.99	11.0

Methods: SW 846-8015M

  
Roland K. Tuttle

10-19-01  
Date





# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 W. MARLAND  
HOBBS, NM 88240  
FAX: 505-357-4701

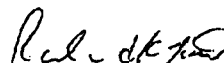
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 3.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1203R  
Project Location: Monument, NM

Sampling Date: See Below  
Receiving Date: 10/18/01  
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	133	10/11/01
0101798-02	MW-2 25'	222	10/11/01
0101798-03	MW-3 25'	83	10/12/01
0101798-04	MW-4 25'	62	10/12/01

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	89
SPIKE	709
SPIKE DUP	720
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	1.54

Methods: SW 846-9253

  
Roland K. Tuttle

10-19-01  
Date

RECEIVED  
Hobbs  
OCD

doc: 154

**12600 West I-20 East  
Odessa, Texas 79763  
Phone: 915-563-1800  
Fax: 915-563-1713**

## CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: KEN DUTTON

Project Name: AHC T. FANDERSON

Company Name ETGI

Project #: RHC 1203R

Company Address: 2544 W. MARLBOROUGH

Project Loc: MONUMENT NMCity/State/Zip: HOBBs NM 88240

PO#:

Telephone No: (505) 397-4882

Fax No: (SP5) 397-4781

**Sampler Signature:**[illegible]



8-2-2001

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

August 21, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0360 0003 1887 7869**

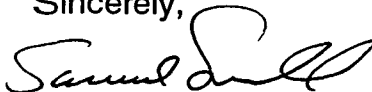
Mr. Roger C. Anderson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

RE: **Groundwater Abatement Plan (AP-19)**  
NMGSAU Battery 94  
Lea County, New Mexico

Dear Mr. Anderson:

Pursuant to your letter of July 5, 2001, enclosed find the Lovington Leader affidavit of publishing of the notification of the Stage 1 abatement proposal for the subject plan. If you have any questions, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: OCD – District 1  
Houston Environmental File  
PBBU Environmental File  
Monument File

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 2, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

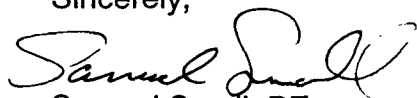
RE: **Incidents and Releases - Pipeline Leak**  
UL-K-Sec. 8, T-19S, R-35E  
T. Anderson Lease  
Lea County, New Mexico  
Status Report

Dear Mr. Sheeley:

Prior to any further excavation or backfill activities at the spill sites located on the subject lease, Amerada Hess Corporation plans to drill monitor wells to determine what impacts, if any, the spills had on the groundwater beneath the sites. A hydraulic gradient will also be determined across the sites. The wells will be drilled and completed in accordance with OCD recommended practices. The groundwater will be analyzed for chloride, TDS and BTEX concentrations. Samples of the 'soil' obtained while drilling the wells will be analyzed for chloride, TPH and BTEX concentrations.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD – Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

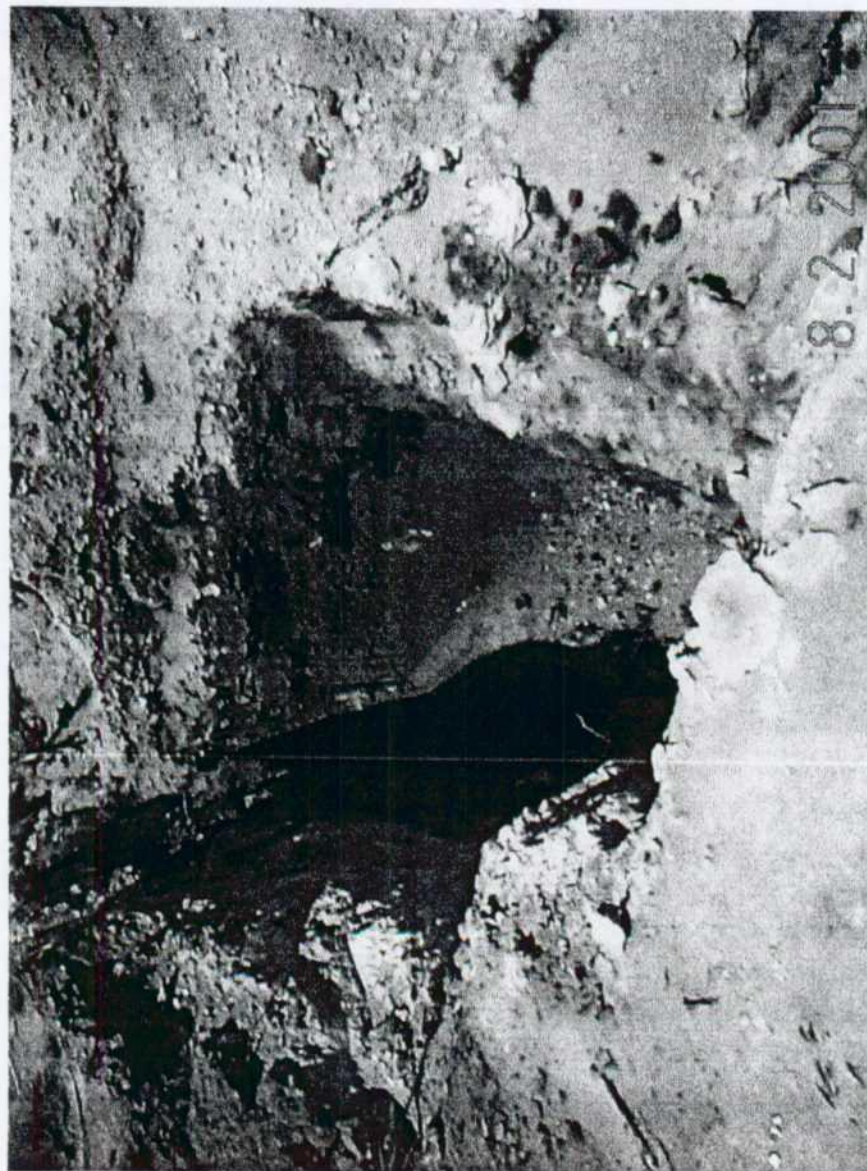






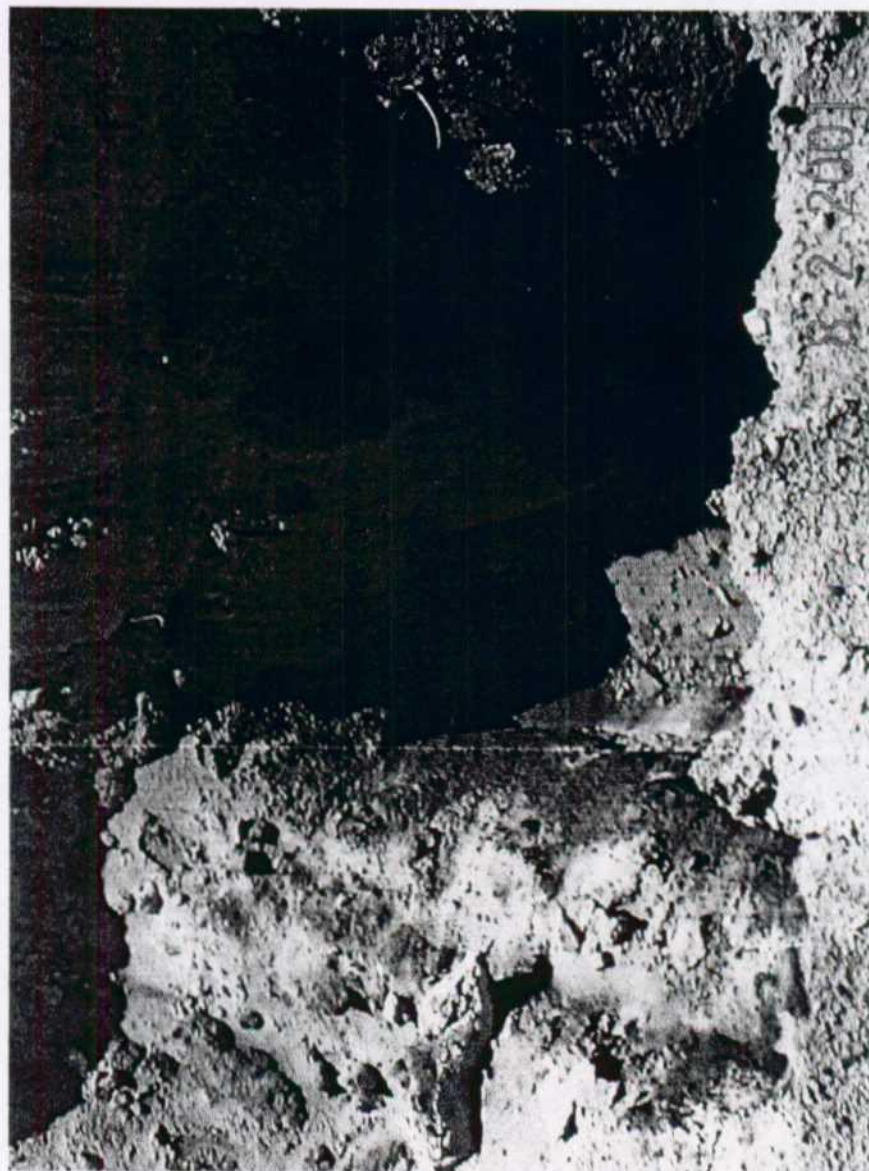






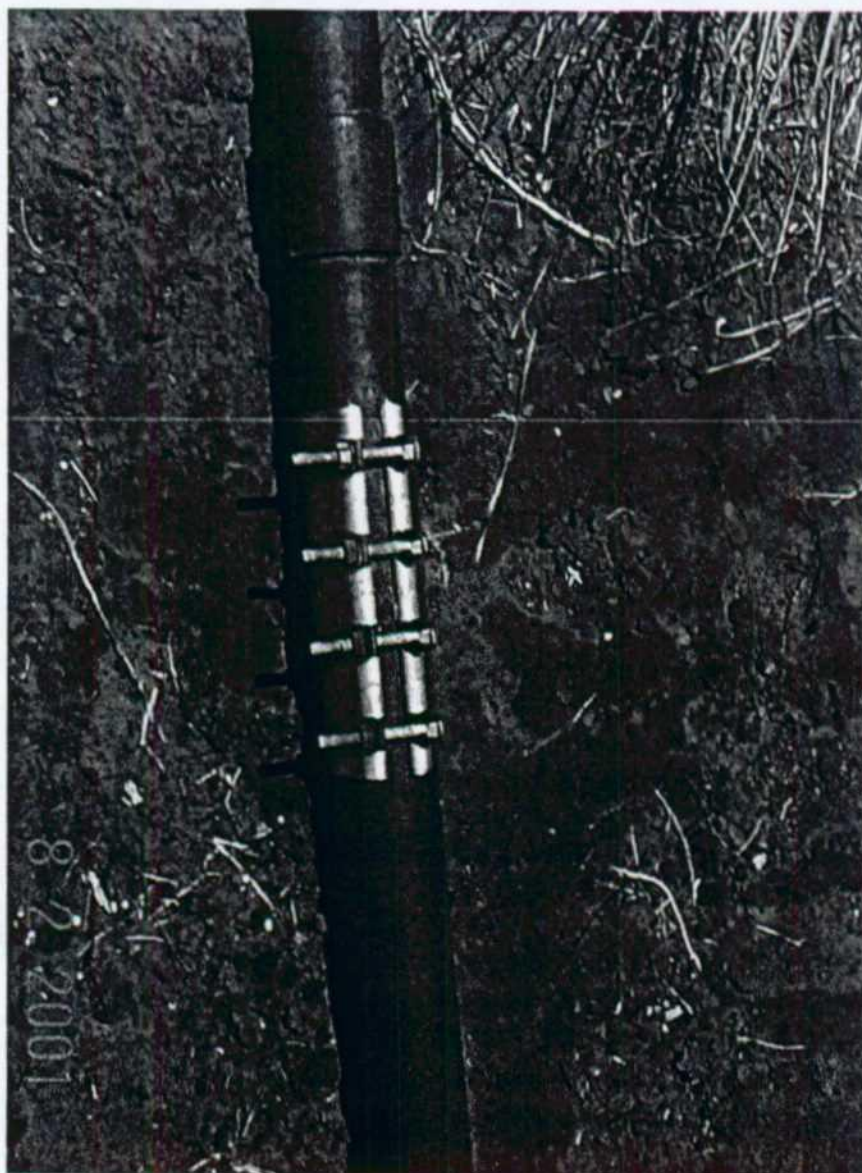












AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

August 15, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0360 0003 1887 7902**

Mr. Paul Sheeley  
Oil Conservation Division  
1625 French Drive  
Hobbs, New Mexico 88240

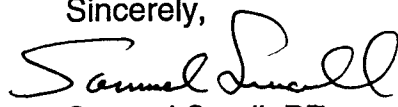
RE: **Pipeline Leak**  
UL-K-Sec. 8, T-19S, R-35E  
Lea County, New Mexico  
NMOCD Letter of August 10, 2001

Dear Mr. Sheeley:

Neither of the leaks cited in the above referenced letter are deemed reportable by Amerada Hess Corporation (AHC), pursuant to Rule 116, and therefore submittal of C-141 forms are not required. The first leak cited, occurred on or about June 18, 2001 and was reported to be approximately 2 bbls in quantity based on observed surface damage. Initial clean-up efforts at the location discovered historical hydrocarbon contamination, of unknown origin or quantity, beneath the spill area. The second leak cited appears to be no more than 1 or 2 bbls and occurred some time prior to 1999.

Pursuant to our telephone conversation on August 14, 2001, AHC will employ a geoprobe on Friday the 16<sup>th</sup> to attempt a delineation of the impacted area in the vicinity of the first spill cited. Based on the results of this delineation effort, a work plan for further delineation and/or remediation will be submitted to the OCD. Clean up of the second spill cited will be undertaken in conjunction with clean up of the first site.

If you have any questions, please contact the undersigned at 915-758-6741 or at the letterhead address.

Sincerely,  
  
Samuel Small, PE  
Environmental Coordinator

Xc: OCD District 1 Supervisor  
Houston Environmental File  
PBBU Environmental File  
Monument Area File

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

## Release Notification and Corrective Action

### OPERATOR

☐ Initial Report ☒ Final Report

Name of Company Chevron USA Inc.	Contact Nathan Mouser	
Address 2401 Ave. "O", Eunice, NM 88231	Telephone No. 505-394-1247	
Facility Name State A 26 Battery	Facility Type Tank Battery	
Surface Owner State of NM	Mineral Owner	Lease No.

### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	26	19S	36E	1980	South	330	West	Lea

### NATURE OF RELEASE

Type of Release Crude	Volume of Release 18 BBLs	Volume Recovered 10 BBLs
Source of Release LACT Unit	Date and Hour of Occurrence 9:00 A.M. 8/7/01	Date and Hour of Discovery 09:00 A.M. 8/7/01
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*  Meter housing on LACT unit failed because of internal corrosion. Replace meter		
Describe Area Affected and Cleanup Action Taken.*  Oil spilled on area 50' x 25' inside battery fenced yard. Vacuum truck and backhoe was used to pick up free fluids and excavate oily caliche. Clean up was completed the same day. All oil contaminated caliche was removed and hauled to approved land farm. Disposed of 32 yards of contaminated caliche.		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Nathan Mouser	Approved by District Supervisor:	
Title: Operations Supervisor	Approval Date:	Expiration Date:
Date: 8/14/2001 Phone/ 394-1247	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

August 10, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

**USPS Certified Mail**  
**Return Receipt #7099 3220 0002 3948 4042**

Re: Pipeline Leak  
UL-K -Sec. 8-T19S-R35E

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has become aware of two pipeline leaks. One leak is across the dirt road east of the above referenced pump site and the other is north about approximately 200 yards on the same line. See enclosed photographs. There is no release notification record of these releases. Pursuant to OCD **Rule 116** form C-141, ("*Release Notification and Corrective Action*"), must be submitted to the OCD district office within 15 days of the release. A remediation plan must also be submitted and approved by OCD.

Due to the proximity to the groundwater in this area the OCD is especially concerned with these releases and an expedient remediation is of a high priority.

OCD **hereby requires** Amerada Hess Corporation to submit a completed C-141 form by August 13, 2001 and a remediation plan by August 28, 2001 which includes the following:

1. A "Site Assessment" including "Ranking Criteria".
2. A plan for delineation of the horizontal and vertical extent of the Total Petroleum Hydrocarbons, Benzene, BTEX and Chlorides.
3. Please notify the OCD 48 hours in advance of any sampling event.

For guidance in this matter see Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

[www.emnrd.state.nm.us/ocd/bureaus/environemntal/review/spill1.doc](http://www.emnrd.state.nm.us/ocd/bureaus/environemntal/review/spill1.doc)

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist







8.2.2001

1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40
41	42	43	44	45	46	47	48	49	50
51	52	53	54	55	56	57	58	59	60
61	62	63	64	65	66	67	68	69	70
71	72	73	74	75	76	77	78	79	80
81	82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99	100



8/22/2001

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

August 15, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0360 0003 1887 7902**

Mr. Paul Sheeley  
Oil Conservation Division  
1625 French Drive  
Hobbs, New Mexico 88240

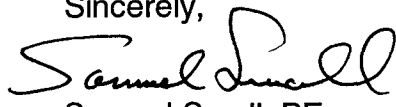
RE: **Pipeline Leak**  
UL-K-Sec. 8, T-19S, R-35E  
Lea County, New Mexico  
NMOCD Letter of August 10, 2001

Dear Mr. Sheeley:

Neither of the leaks cited in the above referenced letter are deemed reportable by Amerada Hess Corporation (AHC), pursuant to Rule 116, and therefore submittal of C-141 forms are not required. The first leak cited, occurred on or about June 18, 2001 and was reported to be approximately 2 bbls in quantity based on observed surface damage. Initial clean-up efforts at the location discovered historical hydrocarbon contamination, of unknown origin or quantity, beneath the spill area. The second leak cited appears to be no more than 1 or 2 bbls and occurred some time prior to 1999.

Pursuant to our telephone conversation on August 14, 2001, AHC will employ a geoprobe on Friday the 16<sup>th</sup> to attempt a delineation of the impacted area in the vicinity of the first spill cited. Based on the results of this delineation effort, a work plan for further delineation and/or remediation will be submitted to the OCD. Clean up of the second spill cited will be undertaken in conjunction with clean up of the first site.

If you have any questions, please contact the undersigned at 915-758-6741 or at the letterhead address.

Sincerely,  
  
Samuel Small, PE  
Environmental Coordinator

Xc: OCD District 1 Supervisor  
Houston Environmental File  
PBBU Environmental File  
Monument Area File

August 10, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

**USPS Certified Mail**  
**Return Receipt #7099 3220 0002 3948 4042**

Re: Pipeline Leak  
UL-K -Sec. 8-T19S-R35E

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has become aware of two pipeline leaks. One leak is across the dirt road east of the above referenced pump site and the other is north about approximately 200 yards on the same line. See enclosed photographs. There is no release notification record of these releases. Pursuant to OCD **Rule 116** form C-141, ("*Release Notification and Corrective Action*"), must be submitted to the OCD district office within 15 days of the release. A remediation plan must also be submitted and approved by OCD.

Due to the proximity to the groundwater in this area the OCD is especially concerned with these releases and an expedient remediation is of a high priority.

OCD **hereby requires** Amerada Hess Corporation to submit a completed C-141 form by August 13, 2001 and a remediation plan by August 28, 2001 which includes the following:

1. A "Site Assessment" including "Ranking Criteria".
2. A plan for delineation of the horizontal and vertical extent of the Total Petroleum Hydrocarbons, Benzene, BTEX and Chlorides.
3. Please notify the OCD 48 hours in advance of any sampling event.

For guidance in this matter see Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

[www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc](http://www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc)

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

---

September 7, 2001

**Hand Delivered 9/7/01**

Mr. Paul Sheeley  
Oil Conservation Division  
1625 N. French Drive  
Hobbs, New Mexico 88240

**RE: Pipeline Leak**

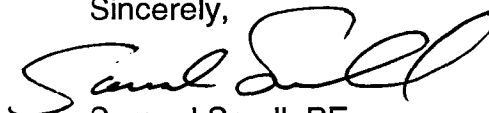
UL-K-Sec. 8, T-19S, R-35E  
Lea County, New Mexico

On August 17, 2001 an attempt was made to delineate the extent of hydrocarbon contamination in the vicinity of the south leak using a geoprobe. The attempt was not successful due to the geoprobe's inability to penetrate beneath a depth of 18 feet at the site. No significant contamination was observed in the 'soil' samples recovered by the geoprobe. Subsequently, material at the location was excavated with a track-hoe and dozer to a depth of approximately 20 feet. A total of approximately 900 yards of material was removed from a 30 ft X 40 ft X 20 ft excavation. The material was hauled to disposal at the NMOCD permitted C & C Landfarm. Composite samples of material from the walls and floor of the excavation were collected and analyzed for hydrocarbon and chloride contamination. The results of the analyses are attached. Amerada Hess Corporation intends to complete work at this site by lining the bottom of the excavation with two (2) feet of red-bed clay and backfilling with clean (< 100 ppm TPH) material.

Contaminated material at the second (north) spill was excavated to a depth of approximately three feet, at which point the site appeared to be cleaned up. Samples collected at the second site are currently being analyzed for chloride and hydrocarbon contamination.

When the results of the analyses on samples from the second site are received, assuming that they indicate that the site is clean, AHC will commence backfilling and contouring both sites.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: OCD – Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File



9-7-01; 6:33AM; MONUMENT  
Sep 04 01 05:25p

SEMINOLE REG

;505 393 1927

#.2/ 5  
P.L

p.3

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
ATTN: MR. KEN DUTTON  
2540 W. MARLAND  
HOBBBS, NM 88240  
FAX: 505-397-4701

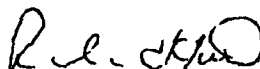
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 2 deg C  
Project #: AHC 1202R  
Project Name: T. Anderson Amerada Hess Corp.  
Project Location: Monument, NM

Sampling Date: 08/31/01  
Receiving Date: 08/31/01  
Analysis Date: 09/04/01

ELT#	FIELD CODE	Chloride mg/kg
0101485-01	Bottom	674
0101485-02	North Wall	514
0101485-03	South Wall	1840
0101485-04	East Wall	177
0101485-05	West Wall	230

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	26
SPIKE	532
SPIKE DUP	541
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.66

Methods: SW 846-9253

  
Roland K. Tuttle

9-04-01  
Date

9-7-01; 6:33AM; MONUMENT  
Sep 04 01 05:25p

SEMINOLE REGION ; 505 393 1927

#. 3/ 5  
p. 3

p. 2

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
ATTN: MR. KEN DUTTON  
2540 W. MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

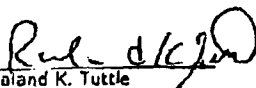
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 2 deg C  
Project #: AHC 1702R  
Project Name: T. Anderson Amerada Hess Corp.  
Project Location: Monument, NM

Sampling Date: 08/31/01  
Receiving Date: 08/31/01  
Analysis Date: 09/04/01

ELI#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10 C28 mg/kg
0101485-01	Bottom	<10	231
0101485-02	North Wall	<10	63
0101485-03	South Wall	<10	<10
0101485-04	East Wall	<10	<10
0101485-05	West Wall	<10	<10

QUALITY CONTROL	476	539
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	95	108
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	487	505
SPIKE DUP	495	510
% EXTRACTION ACCURACY	102	106
BLANK	<10	<10
RPD	2	1

Methods: SW 846-8015M

  
Roland K. Tuttle

9-04-01  
Date

19-7-01; 6:33AM; MONUMENT  
 Sep 04 01 05:25p

P. 1

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.  
 ATTN: MR. KEN DUTTON  
 2540 W. MARLAND  
 HOBBS, NM 88240  
 FAX: 505-397-4701

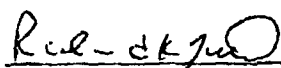
Sample Type: Soil  
 Sample Condition: Intact/ Iced/ 2 deg C  
 Project #: AHC 1202R  
 Project Name: T. Anderson Amerada Hess Corp.  
 Project Location: Monument, NM

Sampling Date: 08/31/01  
 Receiving Date: 08/31/01  
 Analysis Date: 09/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0101485-01	Bottom	<0.025	0.041	<0.025	0.043	<0.025
0101485-02	North Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-03	South Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-04	East Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-05	West Wall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.092	0.097	0.099	0.189	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	92	97	99	95	98
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.085	0.085	0.082	0.164	0.087
SPIKE DUP	0.086	0.087	0.086	0.173	0.088
%EA	86	87	86	87	88
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1	2	4	5	1

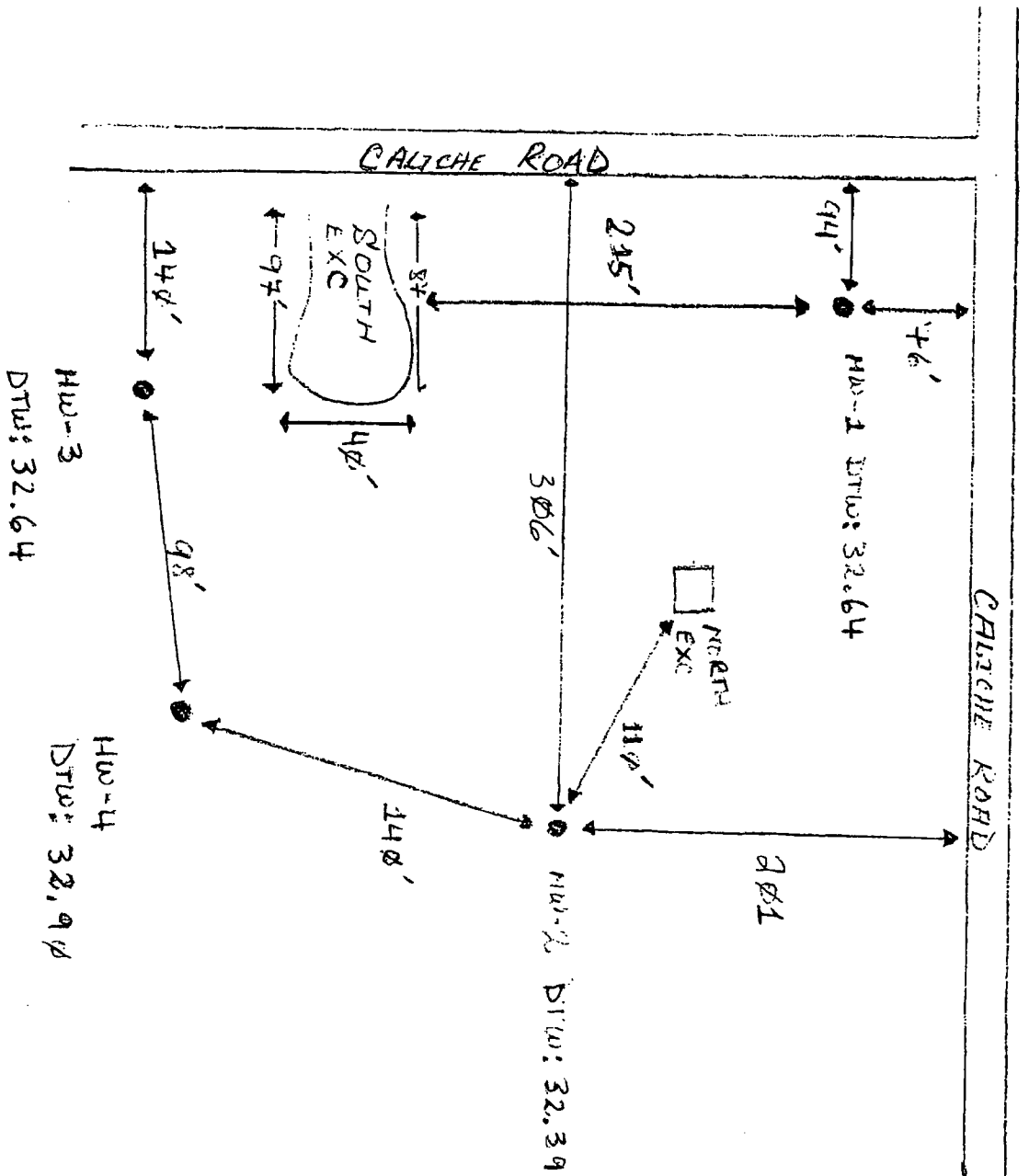
METHODS: EPA SW 846-8021B, 5030

  
 Raland K. Tuttle

9-4-01  
 Date



↑ N



T. ANDERSON  
Sec. 8-205-37E

NOT TO SCALE  
N. ANDERSON - E 776 E

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 WEST MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

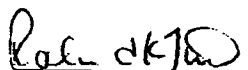
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/16/01  
Receiving Date: 11/17/01  
Analysis Date: 11/19/01

ELT#	FIELD CODE	GRO	DRO
		C6-C10 mg/kg	>C10-C28 mg/kg
0102044-01	South Pit 18'	<10	25
0102044-02	South Pit 26'	<10	47
0102044-03	North Side Wall	<10	<10
0102044-04	South Side Wall	<10	10

QUALITY CONTROL	455	527
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	91	105
SPIKED AMOUNT	500	500
ORIGINAL SAMPLE	<10	<10
SPIKE	455	497
SPIKE DUP	450	493
% EXTRACTION ACCURACY	91	99
BLANK	<10	<10
RPD	1.10	0.81

Methods: SW 846-8015M

  
Roland K. Tuttle

11-20-01  
Date

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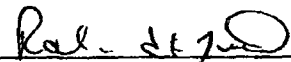
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/16/01  
Receiving Date: 11/17/01  
Analysis Date: 11/19/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102044-01	South Pit 18'	<0.025	<0.025	<0.025	<0.025	<0.025
0102044-02	South Pit 26'	<0.025	0.027	<0.025	0.025	<0.025
0102044-03	North Side Wall	<0.025	0.026	<0.025	<0.025	<0.025
0102044-04	South Side Wall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.097	0.094	0.098	0.202	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	95	93	99	102	97
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	0.044	0.179	0.081	0.379	0.035
SPIKE	0.109	0.110	0.111	0.231	0.117
SPIKE DUP	0.100	0.106	0.112	0.230	0.113
% EXTRACTION ACCURACY	98	99	109	108	112
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	8.78	3.94	0.92	0.00	3.51

METHODS: EPA SW 846-8021B, 5030

  
Raland K. Tuttle

Date

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ATTN: KEN DUTTON  
2540 WEST MARLAND  
HOBBS, NM 88240  
FAX: 505-397-4701

Sample Type: Soil  
Sample Condition: Intact/ Iced/ 1.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/16/01  
Receiving Date: 11/17/01  
Analysis Date: 11/19/01

ELT#	FIELD CODE	Chloride mg/kg
0102044-01	South Pit 18'	394
0102044-02	South Pit 26'	372
0102044-03	North Side Wall	560
0102044-04	South Side Wall	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	868
SPIKE	1360
SPIKE DUP	1370
% EXTRACTION ACCURACY	100
BLANK	<5.00
RPD	0.73

Methods: SW 846-9253

  
Raland K. Tuttle

11-20-01  
Date



Coc # 189

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Ken Dutton

AHC T. Anderson

ETGI

ALL LADDER

254 West Maryland

Monument, n m

Hobbs New Mexico 88240

PO#:

397-4882

Fax No (666) 397-4701

canine lupoid

1.D.C.

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: KEN DUTTON  
2540 WEST MARLAND  
MOBBS, NM 88240  
FAX: 505-397-4701

Sample Type: Water  
Sample Condition: Intact/ Iced/ HCI  
Project Name: AHC T. Andersch  
Project #: AHC 1203R  
Project Location: Monument, NM

Sampling Date: 11/09/01  
Receiving Date: 11/09/01  
Analysis Date: 11/13/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101988-01	Pit GW	<0.001	0.002	0.002	0.002	0.003

QUALITY CONTROL	0.112	0.110	0.115	0.228	0.112
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	112	110	115	114	112
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	0.002	0.002	0.002	0.003
SPIKE	0.113	0.114	0.114	0.232	0.119
SPIKE DUP	0.104	0.103	0.108	0.216	0.108
% EXTRACTION ACCURACY	104	101	106	107	105
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	8.29	10.3	5.50	7.21	8.22

METHODS: EPA SW 846-8021B, 5030

  
Raland K. Tuttle

11-16-01  
Date

# ENVIRONMENTAL LAB OF , INC.

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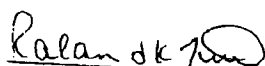
Sample Type: Water  
Sample Condition: Intact/ Iced  
Project Name: AHC T. Anderson  
Project #: AHC 1203R  
Project Location: Monument, NM

Sampling Date: 11/09/01  
Receiving Date: 11/09/01  
Analysis Date: 11/16/01

ELT#	FIELD CODE	Chloride mg/L
0101988-01	Pit GW	612

QUALITY CONTROL	
TRUE VALUE	5050
% INSTRUMENT ACCURACY	5000
SPIKED AMOUNT	101
ORIGINAL SAMPLE	500
SPIKE	151
SPIKE DUP	656
% EXTRACTION ACCURACY	665
BLANK	101
RPD	<5.00
	1.36

METHODS: EPA SW 846-9253

  
Roland K. Tuttle

11-16-01  
Date

Doc # 181

Ken Dutton

ETGT

2540 West Maryland

Jobbs Öels Mexico 88244

637 397-4862

0743505

Camilleri & singhalidis

ALIC T. ANDERSON

ALC 120312

# Monument, Dism

RUSH TAT 101e-Scheuvel

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

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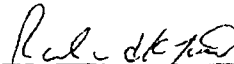
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 3.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1203R  
Project Location: Monument, NM

Sampling Date: See Below  
Receiving Date: 10/18/01  
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	133	10/11/01
0101798-02	MW-2 25'	222	10/11/01
0101798-03	MW-3 25'	83	10/12/01
0101798-04	MW-4 25'	62	10/12/01

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	89
SPIKE	709
SPIKE DUP	720
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	1.54

Methods: SW 846-9253

  
Roland K. Tuttle

10-19-01  
Date



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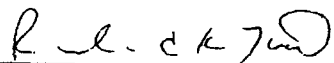
Sample Type: Water  
Sample Condition: Intact/ Iced/ HCl/ -1.0 deg C  
Project Name: T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 10/17/01  
Receiving Date: 10/17/01  
Analysis Date: 10/19/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101790-01	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-02	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-03	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-04	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001

QUALITY CONTROL	0.102	0.104	0.112	0.226	0.094
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	102	104	112	113	94
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	<0.001	<0.001	<0.001	<0.001
SPIKE	0.094	0.093	0.085	0.171	0.085
SPIKE DUP	0.092	0.091	0.088	0.177	0.087
%EA	94	93	85	86	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	2.15	2.17	3.47	2.30	2.32

METHODS: EPA SW 846-8021B, 5030

  
Randal K. Tuttle

10-22-01  
Date

# ENVIRONMENTAL LAB OF , INC.

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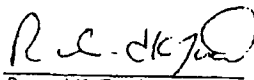
Sample Type: Water  
Sample Condition: intact/ Iced/ -1.0 deg C  
Project Name: T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 10/17/01  
Receiving Date: 10/17/01  
Analysis Date: 10/18/01

ELT #	FIELD CODE	Chloride mg/L
0101790-01	MW 1	532
0101790-02	MW 2	443
0101790-03	MW 3	549
0101790-04	MW 4	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	266
SPIKE	762
SPIKE DUP	771
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.17

Methods: SW 846-9253

  
Randall K. Tuttle

10-22-01  
Date



12600 West I-20 East  
Odessa, Texas 79763  
Phone: 915-563-1800  
Fax: 915-563-1713

12600 West I-20 East  
Odessa, Texas 79763  
Phone: 915-563-1800  
Fax: 915-563-1713

Project Manager: KEN DUTTON

Company Name ETG

Company Address: 2540 W MARLAND

City/State/Zip: H03B s Nm 88240

Telephone No. (505) 397-4882

Sampler Signature: James Casas

Fax No (505) 397-4721

Coci 155

## CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Name: T. ANDERSON

Project #: AHC 1202A

Project Loc: MONUMENT, NM

90#

[illegible]

# ENVIRONMENTAL LAB OF , INC.

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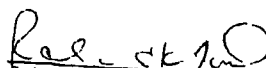
Sample Type: Soil  
Sample Condition: Intact/ Fced/ 3.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/19/01  
Receiving Date: 11/20/01  
Analysis Date: 11/20/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0102050-01	North Pit Bottom	<10	<10
0102050-02	North Pit North Sidewall	<10	<10
0102050-03	North Pit South Sidewall	<10	<10
0102050-04	North Pit East Sidewall	<10	<10
0102050-05	North Pit West Sidewall	<10	<10

QUALITY CONTROL		
TRUE VALUE	459	507
% INSTRUMENT ACCURACY	500	500
SPIKED AMOUNT	92	101
ORIGINAL SAMPLE	476	476
SPIKE	<10	<10
SPIKE DUP	527	579
% EXTRACTION ACCURACY	556	603
BLANK	111	122
RPD	<10	<10
	5.36	4.06

Methods: SW 846-8015M

  
Roland K. Tuttle

11-26-01  
Date

# ENVIRONMENTAL LAB OF , INC.

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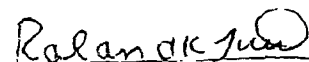
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 3.0 deg C  
Project Name: AMC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/19/01  
Receiving Date: 11/20/01  
Analysis Date: 11/19/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102050-01	North Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-02	North Pit North Sidewall	<0.025	0.026	<0.025	<0.025	<0.025
0102050-03	North Pit South Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-04	North Pit East Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-05	North Pit West Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.097	0.094	0.098	0.202	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	97	94	98	102	97
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.095	0.095	0.098	0.204	0.097
SPIKE DUP	0.097	0.096	0.100	0.207	0.099
% EXTRACTION ACCURACY	95	95	98	102	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2.08	1.05	2.02	1.94	2.04

METHODS: EPA SW 846-8021B, 8030

  
Ralene K. Tuttle

11-26-01  
Date

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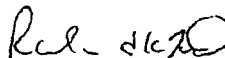
Sample Type: Soil  
Sample Condition: Intact/ Iced/ 3.0 deg C  
Project Name: AHC T. Anderson  
Project #: AHC 1202R  
Project Location: Monument, NM

Sampling Date: 11/19/01  
Receiving Date: 11/20/01  
Analysis Date: 11/20/01

ELT#	FIELD CODE	Chloride mg/kg
0102050-01	North Pit Bottom	71
0102050-02	North Pit North Sidewall	133
0102050-03	North Pit South Sidewall	71
0102050-04	North Pit East Sidewall	35
0102050-05	North Pit West Sidewall	142

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	667
ORIGINAL SAMPLE	83
SPIKE	756
SPIKE DUP	756
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	0.0

Methods: SW 846-9253

  
Roland K. Tuttle

11-26-01  
Date

# Environmental Lab of Texas, Inc.

12600 West I-20 East  
Odessa, Texas 79763

Phone: 915-563-1800  
Fax: 915-563-1713

Project Manager: Ken Dutton

Company Name: ETCI

Company Address: 2540 West Marland

City/State/Zip: Hobbs, New Mexico 88240

Telephone No: (505) 397-4882

Fax No: (505) 397-4701

Sampler Signature: Camille Reynolds

Coc # 194

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Name: AHC T. Anderson

Project #: AHC 1202 R

Project Loc: Monument, NM

PO #:

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative	Matrix	Analyze For	Standard TAT
0102050-01	North Pit Bottom	11-19	1100	1	HNO <sub>3</sub>	Soil	TPH 1005/1006 TPH 4191 TDS/TPH 3AR/EC TF-80154-5R/DRO Metals As Ag Cu Cd Cr Pb Hg Se Volatiles SEM/Quals ATEX 30218/5020	X
02	North Pit North Side Wall	11-19	1110	1	HNO <sub>3</sub>	Soil	TPH 1005/1006 TPH 4191 TDS/TPH 3AR/EC TF-80154-5R/DRO Metals As Ag Cu Cd Cr Pb Hg Se Volatiles SEM/Quals ATEX 30218/5020	X
03	North Pit South Side Wall	11-19	1115	1	HNO <sub>3</sub>	Soil	TPH 1005/1006 TPH 4191 TDS/TPH 3AR/EC TF-80154-5R/DRO Metals As Ag Cu Cd Cr Pb Hg Se Volatiles SEM/Quals ATEX 30218/5020	X
04	North Pit East Side Wall	11-19	1121	1	HNO <sub>3</sub>	Soil	TPH 1005/1006 TPH 4191 TDS/TPH 3AR/EC TF-80154-5R/DRO Metals As Ag Cu Cd Cr Pb Hg Se Volatiles SEM/Quals ATEX 30218/5020	X
05	North Pit West Side Wall	11-19	1126	1	HNO <sub>3</sub>	Soil	TPH 1005/1006 TPH 4191 TDS/TPH 3AR/EC TF-80154-5R/DRO Metals As Ag Cu Cd Cr Pb Hg Se Volatiles SEM/Quals ATEX 30218/5020	X
Special Instructions:								
Requested by: <u>Camille Reynolds</u>	Date: <u>19 Nov 01</u>	Time: <u>1600</u>	Received by: <u>Camille Reynolds</u>	Date: <u>11/19/01</u>	Time: <u>16:20</u>	Sample Containers: <u>1</u>		
Refinanced by: <u>Camille Reynolds</u>	Date: <u>11/19/01</u>	Time: <u>1600</u>	Received by: <u>Camille Reynolds</u>	Date: <u>11/19/01</u>	Time: <u>16:20</u>	Temperature Upon Receipt: <u>30°C</u>		
Signature: <u>Camille Reynolds</u>						Laboratory Comments: <u>See 30°C</u>		



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Betty Rivera  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

FAX

TO: Roger Anderson  
FROM: Paul Shreeley  
Energy Minerals and Natural Resources Department,  
Oil Conservation Division  
RE: letter to Sam Small dated 12/20/01  
DATE: 4-4-02

The following is the letter sent to Sam  
Small. I did not copy the final version  
to my computer. Randy was sent the draft  
by mistake. Sam faxed me today.

*Paul*

2

Pages (Including Transmittal)



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor  
Betty Rivera  
Cabinet Secretary

Lori Wrotenbery  
Director

Oil Conservation Division

FAX

TO:

Randy Bayliss

FROM:

Paul Sheehey

Energy Minerals and Natural Resources Department,  
Oil Conservation Division

RE:

NMGSAV Bat #67 (MayLove)

DATE:

3-20-02

Have Fun!

~ 20

Pages (Including Transmittal)

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 3, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandon Battery Site Remediation**  
NMGSAU Batt. 63 (L-31, T-19S, R-37E)  
NMGSAU Batt. 67 (O-32, T-19S, R-37E) *(May Love)*  
Lea County, New Mexico

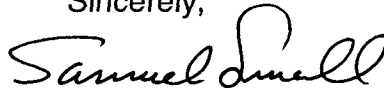
Dear Mr. Sheeley:

Amerada Hess Corporation plans to drill monitor wells at the subject sites to determine if groundwater beneath the sites exhibits impacts from past operations. The wells are to be drilled and completed according to NMOCD recommended practices. Groundwater samples will be analyzed for chloride, TDS and BTEX concentrations. Drill cuttings will be analyzed for chloride, TPH and BTEX concentrations.

Excavation activities at Battery 63 have been suspended pending the results of the monitor well testing. Material has been excavated in the east pit area to a depth of approximately 15 feet and contaminated material is still being encountered. Excavation activities at Battery 67 are ongoing at this time and the monitor wells are being drilled because of the relatively shallow groundwater depth in the area.

If you have any questions or need additional information, please call the undersigned at 915-758-6741.

Sincerely,



Samuel Small  
Environmental Coordinator

Xc: NMOCD - Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument Files





## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

December 20, 2001

**Lori Wrotenberg**

Director

**Oil Conservation Division**

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation Denial  
NMGSAU Battery No. 67 (Chevron May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure approval sent to Amerada Hess Corporation for the site referenced above is hereby rescinded. Any remediation will require strict adherence to: Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

[www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc](http://www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc)

All backfill must be below the TPH and BTEX concentration criteria for the ranking score of this site.

If you have any questions or need any assistance please feel free to contact me at (505) 393-6161 x113 or email [psheeley@state.nm.us](mailto:psheeley@state.nm.us)

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Sheeley".

Paul Sheeley-Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe  
Chris Williams - District I Supervisor  
William Olson - OCD Hydrologist, Santa Fe  
Larry Johnson - OCD Environmental Engr.

October 30, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMGSAU Battery No. 67 (Chevron May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is hereby approved under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [ TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perrimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

**AMERADA HESS CORPORATION**

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-8700

October 25, 2001

**Delivered by Hand 10/26/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

↑ N

CHEVRON MRY LOVE

MW-1 DTW: 25.28

98'

Approx. 29 feet deep & deepest point

PIT  
113 X 72

149'

TANK BATTERY  
164 X 87'

135'

CHILICHE ROAD

88'

209'

235'

162'

117'

143'

MW-4

DTW: 27.88

MW-2

DTW: 27.57

MW-3

DTW: 31.76

DTW - NOT corrected for elevation

NOT TO SCALE  
KEN DUTTON - ETGI

## AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 3, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: Abandon Battery Site Remediation  
NMGSAU Batt. 63 (L-31, T-19S, R-37E)  
NMGSAU Batt. 67 (O-32, T-19S, R-37E) *(May Love)*  
Lea County, New Mexico

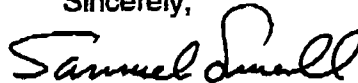
Dear Mr. Sheeley:

Amerada Hess Corporation plans to drill monitor wells at the subject sites to determine if groundwater beneath the sites exhibits impacts from past operations. The wells are to be drilled and completed according to NMOCD recommended practices. Groundwater samples will be analyzed for chloride, TDS and BTEX concentrations. Drill cuttings will be analyzed for chloride, TPH and BTEX concentrations.

Excavation activities at Battery 63 have been suspended pending the results of the monitor well testing. Material has been excavated in the east pit area to a depth of approximately 15 feet and contaminated material is still being encountered. Excavation activities at Battery 67 are ongoing at this time and the monitor wells are being drilled because of the relatively shallow groundwater depth in the area.

If you have any questions or need additional information, please call the undersigned at 915-758-6741.

Sincerely,



Samuel Small  
Environmental Coordinator

Xc: NMOCD - Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument Files

## AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 5, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N French Drive  
Hobbs, New Mexico 88240-1981

RE: Abandoned Battery Site Remediation  
NMGSAU Batt. 67 (May have)  
Unit O, Sec. 32, T-19S, R-37E  
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5<sup>th</sup>. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD - Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

WAR-21-02 16:04 From:8152218  
Dec 04 01 01:59p  
Dec 04 01 03:19p

15053938758

T-421 P.10/17 Job-984  
P. 6

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

E.T.G.I.  
ATTN: CAMILLE REYNOLDS  
2540 WEST MARLAND  
HOBBES, NM 88240  
FAX: 505-397-1701

Sample Type: Soil  
Sample Condition: Intact/ leach/ -0.3 deg C  
Project Name: AHC Chevron May Love  
Project #: AHC 1205R  
Project Location: Manument, NM

Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 11/29/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-02	East Pit Backfill 5-10'	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-03	Former Tank Batt. NW Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.080	0.080	0.093	0.192	0.089
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	90	89	93	96	89
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	0.061	0.257	0.418	0.143
SPIKE	0.089	0.090	0.101	0.190	0.097
SPIKE DUP	0.090	0.095	0.110	0.220	0.106
%EA	90	93	100	102	100
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1.12	5.52	9.42	12.5	9.42

METHODS: EPA SW 846-80218, 8030

  
Roland K. Turbe

12-04-01  
Date

12500 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1710

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 2



DEC 04 01 02:00P

Dec 04 01 03:19p

p. 6

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: CAMILLE REYNOLDS  
2540 WEST MARLAND  
HOBBES, NM 88240  
FAX: 505-397-4701

Sample Type: Soil  
Sample Condition: Intact/ Iced/ -0.5 deg C  
Project Name: AHC Chevron May Love  
Project #: AHC 1205R  
Project Location: Monument, NM

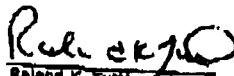
Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 12/02/01

SLY#	FIELD CODE	GRO C6-C10 mg/kg	GRO >C10-C28 mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<10	41
0102098-02	East Pit Backfill 5-10'	<10	202
0102098-03	Former Tank Batt. NW Sidewall	<10	142

## QUALITY CONTROL

TRUE VALUE	482	300
% INSTRUMENT ACCURACY	500	500
SPIKED AMOUNT	97	117
ORIGINAL SAMPLE	476	476
SPIKE	<10	<10
SPIKE DUP	499	638
% EXTRACTION ACCURACY	803	634
BLANK	106	123
RPD	<10	<10
	0.80	0.63

Methods: SW 846-8015M

  
Roland K. Tuttle

12-04-01  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1711

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 3

MAR-21-02 16:04 From:8152210  
Dec 04 01 02:00p

15053039758

T-421 P.12/17 Job-064  
p. 8

Dec 04 01 03:19p

p. 7

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.  
ATTN: CAMILLE REYNOLDS  
2540 WEST MARLAND  
MOBBS, NM 88240  
FAX: 905-357-4701

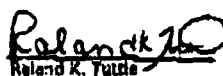
Sample Type: Soil  
Sample Condition: Intact/ Iced/ -0.5 deg C  
Project Name: AMC Chevron May Love  
Project #: AMC 1205K  
Project Location: Monument, NM

Sampling Date: 11/28/01  
Receiving Date: 11/30/01  
Analysis Date: 12/03/01

ELT #	FIELD CODE	Chloride mg/kg
0102098-01	Former Tank Batt. Pit Bottom	66
0102098-02	East Pit Backfill 5-10'	28
0102098-03	Former Tank Batt. NW Sidewall	75

QUALITY CONTROL	3080
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	18
SPIKE	523
SPIKE DUP	523
% EXTRACTION ACCURACY	101
BLANK	410
RPD	0.0

Methods: SW 846-801SM

  
Roland K. Tuttle

12-04-01  
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 4

**NMGSAU BATTERY NO. 67**  
**ANALYTICAL RESULTS**  
**(PPM)**

SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1 Groundwater from								
2 West Excavation	< 0.001	< 0.001	< 0.001	< 0.001			284	1158
3 Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001			266	
4 Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001			248	
5 Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001			213	
6 Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001			301	
7 Vadose Zone MW #1								
8 Sample at 30'					< 10	< 10	18	
9 Vadose Zone MW #2					< 10	< 10	24	
10 Sample at 30'					< 10	< 10	18	
11 Vadose Zone MW #3					< 10	< 10	24	
12 Sample at 25'					< 10	< 10	18	
13 Vadose Zone MW #4					< 10	< 10	24	
14 Sample at 25'					< 10	< 10	24	
15 Bottom of East								
16 Excavation	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
17 Bottom of West								
18 Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	

December 3, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMGSAU Battery No. 67 (Chevon May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The revised closure proposal referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation dated November 30, 2001 is **hereby approved**.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please feel free to write or call me at (505) 393-6161, x113 or email [psheeley@state.nm.us](mailto:psheeley@state.nm.us)

Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

**AMERADA HESS CORPORATION**

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

November 30, 2001

**HAND DELIVRED 11/30/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

A handwritten signature in cursive script that reads 'Samuel Small'.

Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 3, 2001

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New Mexico Oil Conservation Division  
District 1  
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Hobbs, New Mexico 88240-1981

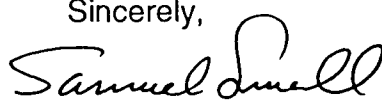
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NMGSAU Batt. 63 (L-31, T-19S, R-37E)  
NMGSAU Batt. 67 (O-32, T-19S, R-37E)  
Lea County, New Mexico

Dear Mr. Sheeley:

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Sincerely,  
  
Samuel Small  
Environmental Coordinator

Xc: NMOCD - Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument Files



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

December 20, 2001

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

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NMGSAU Battery No. 67 (Chevron May Love)  
UL-O -Sec. 32-T19S-R35E

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Paul Sheeley-Environmental Engineer

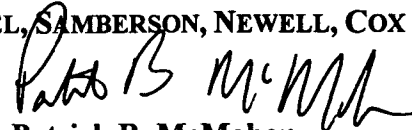
Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe  
Chris Williams - District I Supervisor  
William Olson - OCD Hydrologist, Santa Fe  
Larry Johnson - OCD Environmental Engr.

Letter to Chris Williams  
NMOCD  
March 28, 2002  
Page two

Sincerely,

**HEIDEL, SAMBERSON, NEWELL, COX & McMAHON**

By:

  
**Patrick B. McMahon**

PBM:dr  
Enclosures  
pc: Ed Johnston  
~~/~~Randy Bayliss



December 3, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMGSAU Battery No. 67 (Chevron May Love)  
UL-O-Sec. 32-T19S-R35E

Dear Mr. Small:

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Sincerely,

Paul Sheeley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

**AMERADA HESS CORPORATION**

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 640  
SEMINOLE, TEXAS 78380  
915/758-6700

November 30, 2001

**HAND DELIVERED 11/30/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

*Samuel Small*  
Samuel Small, PE  
Environmental Coordinator

Xc: NMOC Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

October 30, 2001

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation  
NMQSAU Battery No. 67 (Chevron May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is hereby approved under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Shesley  
Environmental Engineer  
Cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
William Olson - Hydrologist

Letter to Paul Scheeley  
NMOCD  
December 4, 2001  
Page two.

*lawsuits*  
Your response to Mr. Johnston's concerns was that you do not get involved between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy. *in*

Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:

*Patrick B. McMahon*  
Patrick B. McMahon

PBM:cd

cc: Ed Johnston  
Lori Wrotenbery  
Chris Williams

476-3462

**LAW OFFICES****HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. MCMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1399  
LOVINGTON, NM 88240  
TELEPHONE (505) 396-5305  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1945)

December 4, 2001

Paul Scheeley  
NMOCD  
1625 N. French Drive  
Hobbs NM 88240

Re: **Amerada-Hess Abandoned Battery Site Remediation**  
**NMGSAU Battery No. 67**  
**Unit O, Section 32, Township 19 South, Range 37 East,**  
**NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

December 20, 2001

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Amerada Hess Corporation  
Attn: Samuel Small  
P.O. Box 840  
Seminole, Texas 79360

Re: Abandon Battery Site Remediation Denial  
NMGSAU Battery No. 67 (Chevon May Love)  
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure approval sent to Amerada Hess Corporation for the site referenced above is hereby rescinded. Any remediation will require strict adherence to: Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

[www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc](http://www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc)

All backfill must be below the TPH and BTEX concentration criteria for the ranking score of this site.

If you have any questions or need any assistance please feel free to contact me at (505) 393-6161 x113 or email [psheeley@state.nm.us](mailto:psheeley@state.nm.us)

Sincerely,

Paul Sheeley-Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe  
Chris Williams - District I Supervisor  
William Olson - OCD Hydrologist, Santa Fe  
Larry Johnson - OCD Environmental Engr.

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 5, 2001

**RECEIVED**

**OCT 10 2001**

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N French Drive  
Hobbs, New Mexico 88240-1981

RE: Abandoned Battery Site Remediation  
NMGSAU Batt. 67  
Unit O, Sec. 32, T-19S, R-37E  
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5<sup>th</sup>. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD – Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. MCMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

December 4, 2001

**FAXED**  
12-4-01

Paul Scheeley  
NMOCD  
1625 N. French Drive  
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit O, Section 32, Township 19 South, Range 37 East,  
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

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As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.



Letter to Paul Scheeley  
NMOCD  
December 4, 2001  
Page two.

Your response to Mr. Johnston's concerns was that you do not get involved between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

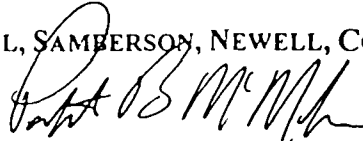
Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By



Patrick B. McMahon

PBM:cd

pc: Ed Johnston  
Lori Wrotenbery  
Chris Williams



PHONE (915) 673-7001 • 2111 BLEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
HSNCM

ATTN: JOE DEAN  
P.O. DRAWER 1599  
LOVINGTON, NM 88260  
FAX TO:

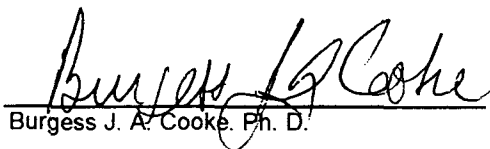
Receiving Date: 01/23/02  
Reporting Date: 01/24/02  
Project Number: NOT GIVEN  
Project Name: JOHNSON  
Project Location: EUNICE, NM

Sampling Date: 01/23/02  
Sample Type: GROUNDWATER  
Sample Condition: COOL & INTACT  
Sample Received By: GP  
Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/L)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		01/23/02	01/23/02	01/23/02	01/23/02	01/23/02	01/23/02
H6458-1	J-PIT BOTTOM	<5.0	378*	<0.002	<0.002	<0.002	<0.006
Quality Control		30.0	26.0	0.102	0.103	0.103	0.301
True Value QC		30.0	30.0	0.100	0.100	0.100	0.300
% Recovery		100	86.7	102	103	103	100
Relative Percent Difference		2.0	15.3	0.5	3.1	0.7	0.2

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

\*Oily top layer removed by decantation. Heavy oil (>C<sub>28</sub>) also detected (56.9 mg/L).

  
Burgess J. A. Cooke, Ph. D.

1/24/02  
Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



Page \_\_\_\_ of \_\_\_\_

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

**+ Cardinal cannot accept verbal changes. Please fax written changes to 915-873-7020.**

ARADRA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 5, 2001

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N French Drive  
Hobbs, New Mexico 88240-1981

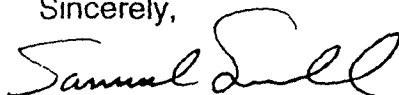
RE: Abandoned Battery Site Remediation  
NMGSAU Batt. 67  
Unit O, Sec. 32, T-19S, R-37E  
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5<sup>th</sup>. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD – Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

# AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

October 25, 2001

**Delivered by Hand 10/26/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

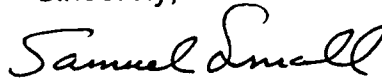
Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

*Paul-  
I will be out of  
the office next  
week. If you have  
questions, call Rob  
Williams @ 343-2844/  
Ext 103*

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

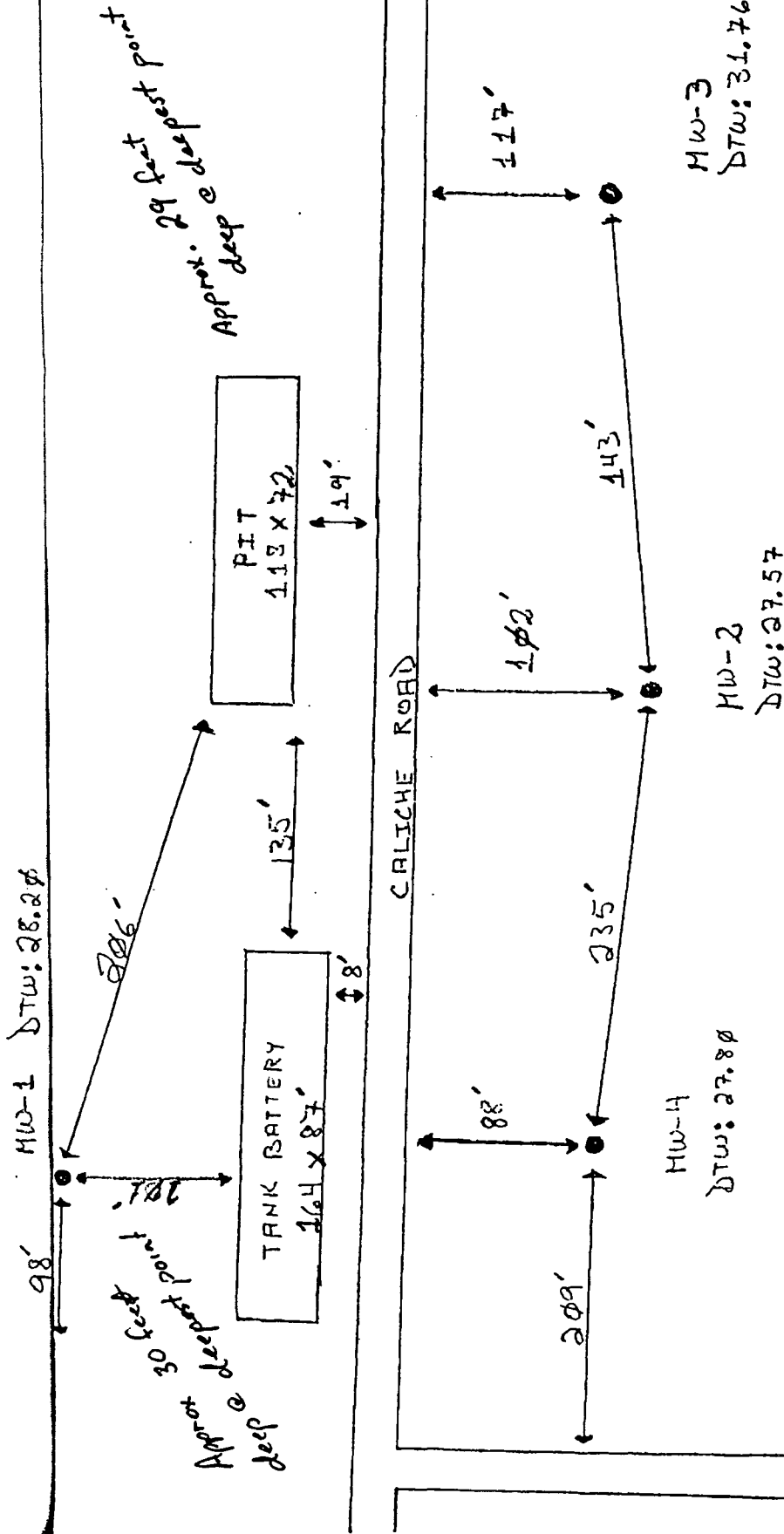
A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

↑ N

CHEVRON MAY LOVE



DTW - NOT corrected for elevation

NOT TO SCALE  
KEN DUTTON - ETGI

**NMGSAU BATTERY NO. 67**  
**ANALYTICAL RESULTS**  
**(PPM)**

SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1 Groundwater from								
2 West Excavation	< 0.001	< 0.001	< 0.001	< 0.001			284	1158
3 Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001			266	
4 Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001			248	
5 Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001			213	
6 Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001			301	
Vadose Zone MW #1								
7 Sample at 30'					< 10	< 10	18	
Vadose Zone MW #2								
8 Sample at 30'					< 10	< 10	24	
Vadose Zone MW #3								
9 Sample at 25'					< 10	< 10	18	
Vadose Zone MW #4								
10 Sample at 25'					< 10	< 10	24	
Bottom of East								
Excavation								
Bottom of West	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	



*LAW OFFICES*

**HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

C. GENE SAMBERSON  
MICHAEL T. NEWELL  
LEWIS C. COX, III  
PATRICK B. MCMAHON

311 NORTH FIRST STREET  
POST OFFICE DRAWER 1599  
LOVINGTON, NM 88260  
TELEPHONE (505) 396-5303  
FAX (505) 396-5305

F.L. HEIDEL  
(1913-1985)

December 4, 2001

**FAXED**  
12-4-01

Paul Scheeley  
NMOCD  
1625 N. French Drive  
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation  
NMGSAU Battery No. 67  
Unit O, Section 32, Township 19 South, Range 37 East,  
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

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Letter to Paul Scheeley  
NMOCD  
December 4, 2001  
Page two.

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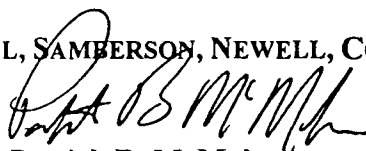
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Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:

  
Patrick B. McMahon

PBM:cd  
pc: Ed Johnston  
Lori Wrotenbery  
Chris Williams



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

## ANALYTICAL RESULTS FOR

HSNCM

ATTN: JOE DEAN

P.O. DRAWER 1599

LOVINGTON, NM 88260

FAX TO:

Receiving Date: 01/23/02

Reporting Date: 01/24/02

Project Number: NOT GIVEN

Project Name: JOHNSON

Project Location: EUNICE, NM

Sampling Date: 01/23/02

Sample Type: GROUNDWATER

Sample Condition: COOL &amp; INTACT

Sample Received By: GP

Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/L)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		01/23/02	01/23/02	01/23/02	01/23/02	01/23/02	01/23/02
H6458-1	J-PIT BOTTOM	<5.0	378*	<0.002	<0.002	<0.002	<0.006
Quality Control		30.0	26.0	0.102	0.103	0.103	0.301
True Value QC		30.0	30.0	0.100	0.100	0.100	0.300
% Recovery		100	86.7	102	103	103	100
Relative Percent Difference		2.0	15.3	0.5	3.1	0.7	0.2

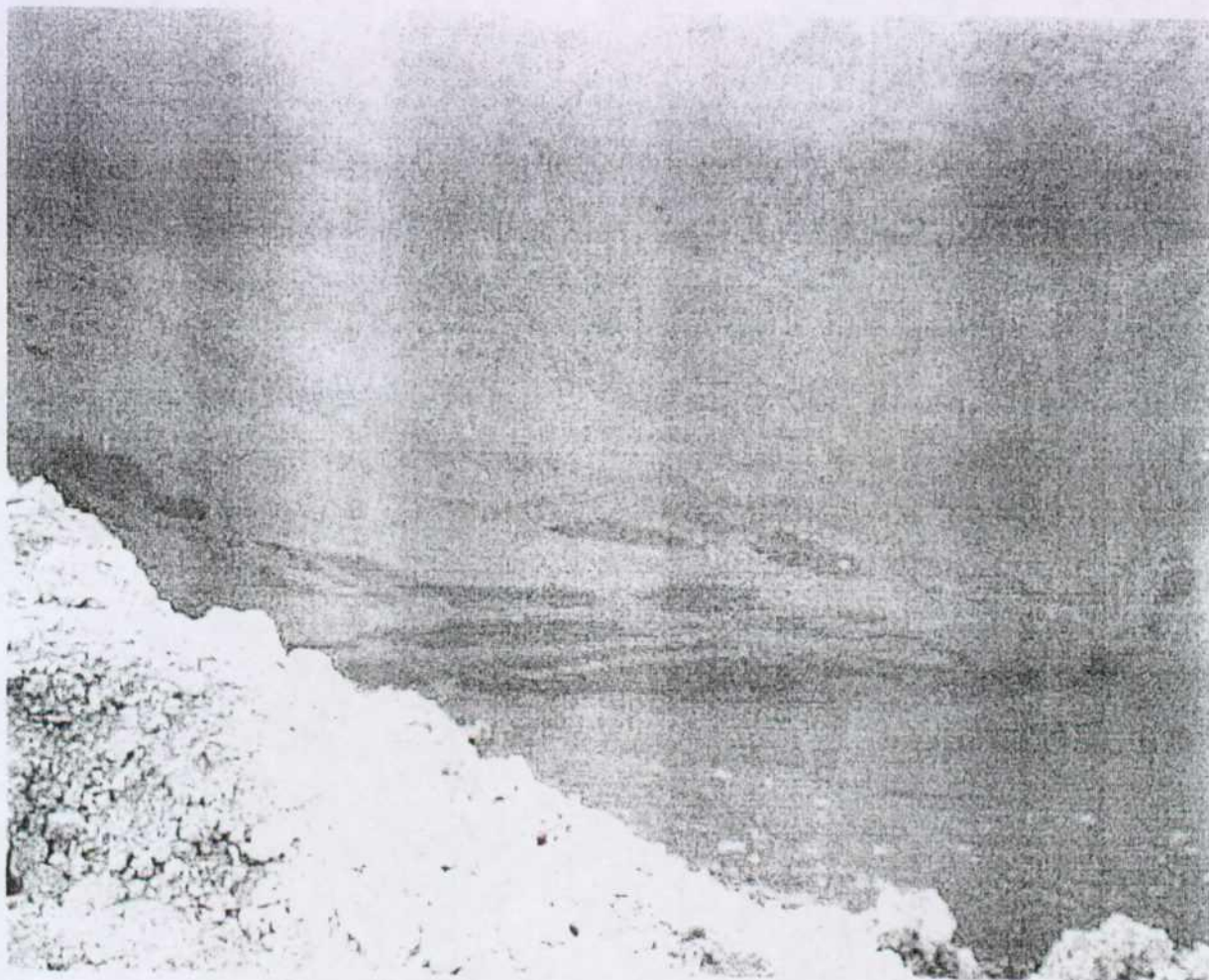
METHODS: TPH GRO &amp; DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

\*Oily top layer removed by decantation. Heavy oil (>C<sub>28</sub>) also detected (56.9 mg/L).

*Burgess J. A. Cooke*  
Burgess J. A. Cooke, Ph. D.

1/24/02  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



## AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

November 30, 2001

RECEIVED

DEC 03 2001

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

**HAND DELIVRED 11/30/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981


RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
Unit O, Sec. 32, T-19S, R-37E  
Lea County, New Mexico

Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

  
Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

12358

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE  
OFFICE 915/758-6741  
FAX 915/758-6768

P.O. BOX 840  
SEMINOLE, TEXAS 79360  
915/758-6700

---

October 25, 2001

**Delivered by Hand 10/26/01**

Mr. Paul Sheeley  
New Mexico Oil Conservation Division  
District 1  
1625 N. French Drive  
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**  
NMGSAU Battery No. 67 (Chevron May Love)  
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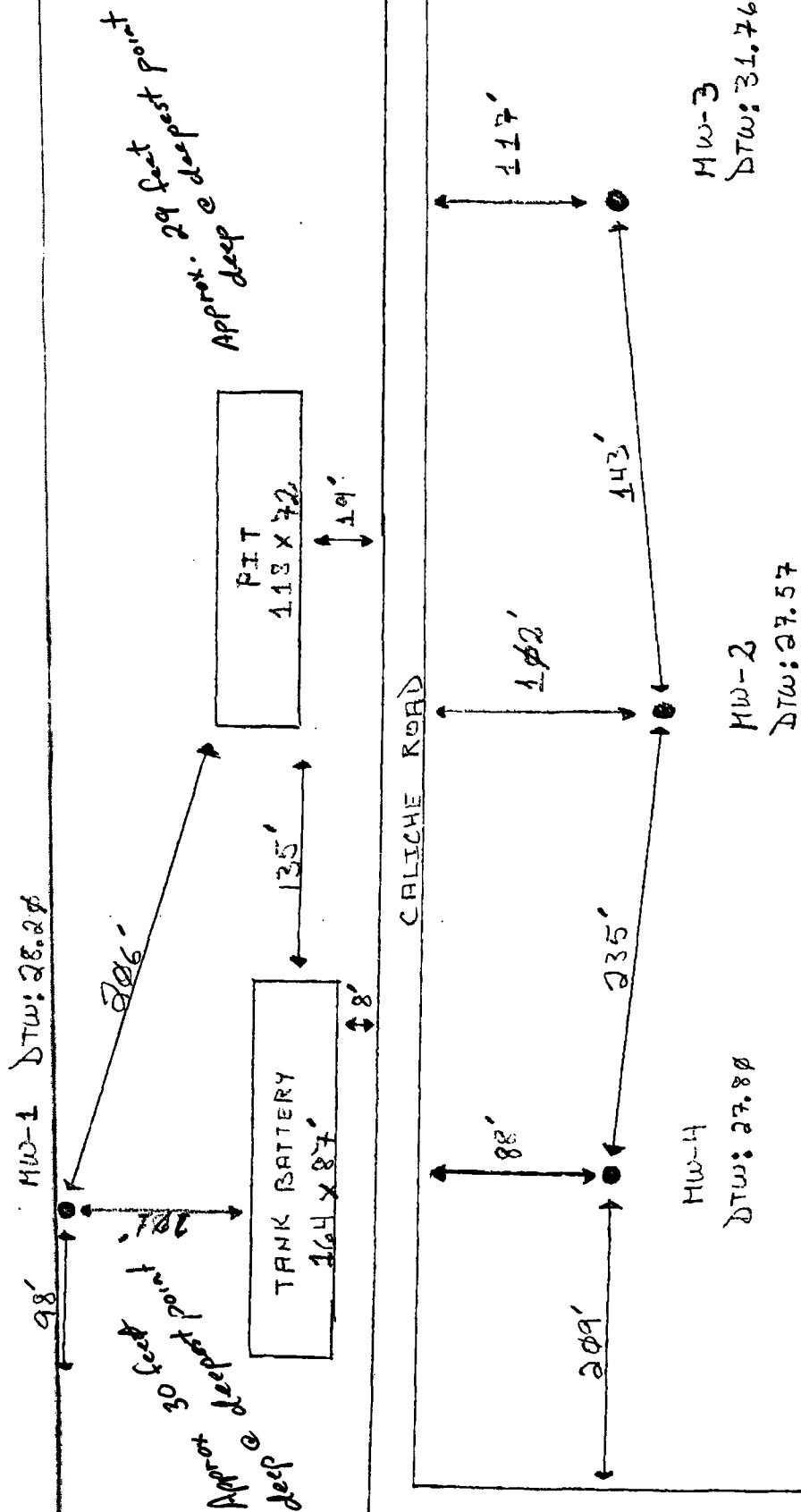
Sincerely,

A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE  
Environmental Coordinator

Xc: NMOCD Santa Fe  
Houston Environmental File  
PBBU Environmental File  
Monument File

CHEVRON MAY LOVE

DTW - NOT corrected for elevation

NOT TO SHARE  
KEN DUTTON - ETGI



**NMGSAU BATTERY NO. 67**  
**ANALYTICAL RESULTS**  
**(PPM)**

	SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
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2	West Excavation	< 0.001	< 0.001	< 0.001	< 0.001			284	1158
3	Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001			266	
4	Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001			248	
5	Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001			213	
6	Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001			301	
7	Vadose Zone MW #1								
8	Sample at 30'					< 10	< 10	18	
9	Vadose Zone MW #2					< 10	< 10	24	
10	Sample at 30'					< 10	< 10	18	
11	Vadose Zone MW #3					< 10	< 10	24	
12	Sample at 25'					< 10	< 10	18	
13	Vadose Zone MW #4					< 10	< 10	24	
14	Sample at 25'					< 10	< 10	24	
15	Bottom of East								
16	Excavation	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
17	Bottom of West								
18	Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	