

AP - 002

**STAGE 1 & 2  
REPORTS**

**DATE:**

JAN. 14, 1999

# Shell E&P Technology Company

A Division of Shell Exploration & Production Company



Woodcreek  
200 N Dairy Ashford  
Houston, TX 77079

P.O. Box 576  
Houston, TX 77001

January 14, 1999

RECEIVED

JAN 14 1999

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Mr. Roger Anderson  
Environmental Bureau Chief  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

**Subject: Grimes Lease Stage I Interim Report; Response to New Mexico Oil Conservation Division (OCD) December 15, 1998 Letter**

Dear Mr. Anderson,

Shell Exploration and Technology Company (Shell) respectfully submits this letter pursuant to your December 15, 1998, letter. As requested in your letter, Shell submits the following information:

**A. Requested Information**

1. Figure 14, Groundwater Potentiometric Map is attached and indicates that the groundwater gradient in the subject area is to the east.
2. Figure 15 (attached) shows soil gas survey locations where total petroleum hydrocarbons (TPH) were detected. Where detected, TPH concentration ranges are color-coded and concentrations are shown. Interpretations of analytical results of soil borings and groundwater investigations will be submitted in the final Stage I Report following additional work at the subject site.
3. a-d Figure 15 (discussed above in item A. 2) plots the results of the soil vapor survey.
4. Soil vapor sample locations SV-187, TSV-O, TSV-P, and TSV-Q have been included in Figure 5 (attached). Sample location SV-297 is actually sample location SV-187. SV-297 was a typographical error.
5. Analytical results for TSV-W are attached. Table 2 has been revised to include the missing sample point analytical results and will be submitted with the final Stage I Abatement Plan report as requested by OCD.
6. Sample depths for the "CSS" samples are 0-1 foot below ground surface. Sample depths are included in the attached Table 3.

7. The full suite of analytical sampling data for CSS #6 is included in the attached Table 3.

**B. Additional Investigation Activities**

1. Attached is Shell's vapor monitoring and contingency plan for OCD approval prior to excavation activities.
2. As requested by OCD, confirmation samples from the assessment areas defined in Task 2 and Task 3 of Shell's November 6, 1998, correspondence will be collected as discrete samples.
3. Soil samples will be field preserved with methanol.
4. All wastes generated during the investigation will be disposed of at an OCD approved facility.
5. As requested by OCD, Shell submits the following workplan for additional investigation. This workplan is based on discussions with OCD in our meeting January 7, 1999. The workplan to perform Tasks 1-5 was submitted to the OCD for approval on November 6, 1998 and approved in your letter dated December 15, 1998.

**Task #1: Free Product Removal**

Monitor well GMW-5 will be bailed daily for ten days to determine the recharge rate of free product hydrocarbons. Based on the ten-day free product recharge rate, a hydrocarbon recovery program will be implemented. The free product recovery will continue until the hydrocarbons are no longer measurable with a bailer or an electronic oil/water interface probe. The recovered product will be disposed of at an OCD approved disposal facility.

**Task #2: North of Grimes Battery Assessment-Remediation**

Shell proposes to assess and dispose of the soils containing organic constituents north of the former Grimes Battery as shown in Figure 1.

Three individual discrete soil samples will be collected prior to any assessment work. The samples will be selected from sample locations identified as representing highest observed organic constituent concentrations based on field observation (odor, visible staining, and PID readings). The samples will be submitted for total petroleum hydrocarbons (USEPA Method 418.1) and for compounds listed in 20 NMAC 6.2 3103 and 1101 laboratory analysis of these compounds will be performed using USEPA methods 8260, 8270, 8080, 8081A, 150.1, 160.1, 200.7, 245.1, 335.2, 340.2, and 353.3.

The assessment work will be done with a backhoe to determine the vertical and horizontal extent of organic constituents. Field backhoe assessment and excavation will

continue until no visible hydrocarbons and no PID readings are observed. Shell will do either a Risk Assessment or use OCD Guidelines for Remediation of Leaks, Spills, and Releases to determine the soil cleanup level. Once the visual and field measured extent of organic constituents have been removed with the backhoe, a confirmation soil sample will be taken. The confirmation sample will be taken from the same locations as the initial samples. The final laboratory chemical analyses will be compounds that were found in the initial samples.

### **Task #3: South of Grimes Battery Assessment-Remediation**

Shell proposes to assess and dispose of the soils containing organic constituents south of the former Grimes Battery designated as Task Area #3.

Three individual discrete soil samples will be collected prior to any assessment work. The samples will be selected from sample locations identified as representing highest organic constituent concentrations based on field observation (odor, visible staining, and PID readings). The samples will be submitted for total petroleum hydrocarbons (USEPA Method 418.1), benzene, toluene, ethylbenzene, and xylenes (BTEX- USEPA methods 8260), chlorides (USEPA Method 200, and metals (USEPA Method 6010).

The assessment work will be done with a backhoe to determine the vertical and horizontal extent organic constituents. Field backhoe assessment and excavation will continue until no visible hydrocarbons and no PID readings are observed. Shell will do either a Risk Assessment or use OCD Guidelines for Remediation of Leaks, Spills, and Releases to determine the soil cleanup level. Once the visual and field measured extent of organic constituents has been removed with the backhoe, three confirmation soil samples will be collected.

The confirmation samples will be taken from the same locations as the initial samples. The final laboratory chemical analyses will be of those analyses that indicated the compounds were found in the initial samples.

### **Task #4: Casey Residence Assessment**

At the Grimes Battery Site area, Shell proposes to drill three soil borings (GSB-12, GSB-13, & GSB-14) around and in the Casey home property in an attempt to delineate the eastern, southern, and northern edge of the material found at Grimes soil boring #7 (GSB-7) (Figure 1, Task Area #4).

The sampling protocol will consist of sampling every five feet until PID readings are zero with a minimum depth of 20 feet. Samples representing the highest PID reading and bottom of the boring will be submitted for total petroleum hydrocarbons (USEPA Method 418.1) and for compounds listed in 20 NMAC 6.2 3103 and 1101 laboratory analysis of these compounds will be performed using USEPA methods 8260, 8270, 8080, 8081A, 150.1, 160.1, 200.7, 245.1, 335.2, 340.2, and 353.3.

If field observations necessitate additional soil borings, we will commit to up to two additional soil borings in areas to be determined by the field activities. The same sampling protocols will be followed. Shell will obtain the property owner's permission prior to commencing these activities.

**Task #5: East of Tasker Road Assessment**

Shell proposes to drill one soil boring (TSB-14) approximately 20 feet east of TSB-13 in the front yard of 1328 Tasker (Figure 2, Task Area #5).

The sampling protocol will consist of sampling every five feet until PID readings are zero with a minimum depth of 20 feet. Samples representing the highest PID reading and bottom of the boring will be submitted for total petroleum hydrocarbons (USEPA Method 418.1) and for compounds listed in 20 NMAC 6.2 3103 and 1101 laboratory analysis of these compounds will be performed using USEPA methods 8260, 8270, 8080, 8081A, 150.1, 160.1, 200.7, 245.1, 335.2, 340.2, and 353.3.

If field observations necessitate additional soil borings, we will commit to up to two additional soil borings in areas to be determined by the field activities. The same sampling protocols will be followed. Shell will obtain the property owner's permission prior to commencing these activities.

**Task #6: Southwest Area of Subject Property**

Shell proposes the drilling and sampling of one soil boring in the area where TPH was detected by soil vapor analysis. The proposed sample location is between SV-24 and 239. Soils will be sampled at five-foot intervals and screened in the field for volatile organic constituents with a photoionization detector (PID). The borehole will be installed to a minimum depth of 20 feet below ground surface or until PID readings are zero. The sample exhibiting the highest PID reading and the sample collected at total depth of the borehole will be submitted for analysis for TPH using USEPA Method 418.1 for total petroleum hydrocarbons, BTEX- (USEPA method 8260), chlorides (USEPA Method 200,) and metals (USEPA Method 6010).

Prior to drilling, Shell will research the lease history of the subject site and locate the two Rice Engineering pipelines and one Shell line that are present in the subject area to identify if the elevated TPH concentrations are a result of activities not associated with Shell and/or the scope of work of the subject Stage I Abatement Plan.

**Task #7: Southeast Area of Subject Property**

Shell proposes conducting additional soil vapor survey activities in the area where TPH was detected by soil vapor analysis. The proposed soil vapor sample locations are sample point SV-111 and approximately 50 feet north, south, east, and west of SV-111. If organic constituents are detected, additional soil vapor samples will be collected to identify the horizontal extent of organic constituents. Based on the soil vapor analysis,

Shell will discuss with OCD to determine the need for a soil boring. The sampling protocol is described above in **Task #6**.

**Task #8: Cobb Drive**

Shell proposes conducting additional soil vapor survey activities in the area where TPH was detected by soil vapor analysis. The proposed soil vapor sample locations are sample point SV-164 and approximately 50 feet north, south, east, and west of SV-164. If organic constituents are detected, additional soil vapor samples will be collected to identify the horizontal extent of organic constituents. Based on the soil vapor analysis, Shell will discuss with OCD to determine the need for a soil boring. The sampling protocol is described above in **Tasks #6 and #7**.

**Task #9: Cobb Drive**

Shell proposes conducting additional soil vapor survey activities in the area where TPH was detected by soil vapor analysis. The proposed soil vapor sample locations are sample point SV-182 and approximately 50 feet north, south, east, and west of SV-182. If organic constituents are detected, additional soil vapor samples will be collected to identify the horizontal extent of organic constituents. Based on the soil vapor analysis, Shell will discuss with OCD to determine the need for a soil boring. The sampling protocol is described above in **Tasks #6- #8**.

**Task #10: East of Tasker Road**

Shell proposes conducting additional soil vapor survey activities in the area where TPH was detected by soil vapor analysis. The proposed soil vapor sample locations are sample point SV-187 and approximately 50 feet north, south, east, and west of SV-187. If organic constituents are detected, additional soil vapor samples will be collected to identify the horizontal extent of organic constituents. Based on the soil vapor analysis, Shell will discuss with OCD to determine the need for a soil boring. The sampling protocol is described above in **Tasks #6- #9**.

**Task #11-Monitor Well GMW-9**

Shell proposes the drilling and sampling of four soil borings in the area adjacent to GMW-9. The proposed sample locations are 50 feet north, south, east, and west of GMW-9. Soils will be sampled at five-foot intervals and screened in the field for volatile organic constituents with a photoionization detector (PID). The boreholes will be installed to a minimum depth of 20 feet below ground surface or until PID readings are zero. The sample exhibiting the highest PID reading and the sample collected at total depth of the borehole will be submitted for analysis for TPH using USEPA Method 418.1, BTEX (USEPA Method 8260), and metals (USEPA Method 6010).

**Task #12- Delineation of Western Extent of Tasker Road Pit**

Shell proposes the drilling and sampling of one soil boring approximately forty feet west of TSB-12. Soils will be sampled at five-foot intervals and screened in the field for volatile organic constituents with a photoionization detector (PID). The boreholes will be installed to a minimum depth of 20 feet below ground surface or until PID readings are zero. The sample exhibiting the highest PID reading and the sample collected at total depth of the borehole will be submitted for analysis for TPH using USEPA Method 418.1 and BTEX using USEPA Method 8260.

**Task #13- Metals Background Samples**

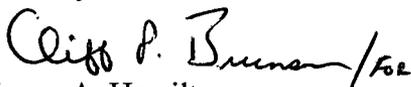
Three surface soil samples (0-1 feet below ground surface) will be collected and analyzed for metals using USEPA Method 6010 to identify a range of metal background concentrations in the subject area. The proposed sample locations are sections 6, 13, and 76 (Figure 14).

**Task #14-Sampling of Monitor Wells**

Shell will resample the thirteen existing monitor wells located at the subject site. A groundwater sample from each of the monitor wells will be collected and submitted for analysis for BTEX, phenol, polycyclic aromatic hydrocarbons (PAH), and metals using USEPA Methods 8260, 5520, 8270, and 6010, respectively. Based on the analytical results, additional monitor wells may be installed at a later date.

The work activities described above, if approved by OCD, will begin on February 1, 1999, and an Investigation Update Report will be submitted to OCD on April 15, 1999. If you have any questions, I may be reached at (281) 544-2322.

Sincerely,



Wayne A. Hamilton  
Retained Properties Manager



# Performance Analytical Inc.

Air Quality Laboratory  
A Division of Columbia Analytical Services, Inc.  
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## LABORATORY REPORT

Client:	BBC INTERNATIONAL, INC.	Date of Report:	09/22/98
Address:	1324 W. Marland Blvd. Hobbs, NM 88240	Date Received:	08/24/98
Contact:	Mr. Cliff Brunson	PAI Project No:	P9801474
		Purchase Order:	Verbal

Client Project ID: Shell Tasker Site

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One (1) Stainless Steel Summa Canister labeled:

“TSV-W 6.5”

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The sample was received at the laboratory under chain of custody on August 24, 1998. The sample was received intact. The dates of analysis are indicated on the attached data sheets.

### Volatile Organic Compound Analysis

The sample was analyzed by combined gas chromatography/mass spectrometry (GC/MS) for volatile organic compounds and tentatively identified compounds. The analyses were performed according to the methodology outlined in EPA Method TO-14 from the Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air, EPA 600/4-84-041, U.S. Environmental Protection Agency, Research Triangle Park, NC, April, 1984 and May, 1988. The analyses were performed by gas chromatography/mass spectrometry, utilizing a direct cryogenic trapping technique. The analytical system used was comprised of a Hewlett Packard Model 5989 GC/MS/DS interfaced to an Entech 7000 automated whole air inlet system/cryogenic concentrator. A 100% Dimethylpolysiloxane capillary column (RT<sub>x</sub>-1, Restek Corporation, Bellefonte, PA) was used to achieve chromatographic separation.

The results of analyses are given on the attached data summary sheets.

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Data Release Authorization:

Christopher Casteel  
Manager of Technical Operations

Reviewed and Approved:

Michael Taday  
Laboratory Director



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## RESULTS OF ANALYSIS

PAGE 1 OF 3

Client : BBC International, Inc.

Client Sample ID : TSV-W 6.5'  
PAI Sample ID : P9801474-001

Test Code : GC/MS EPA TO-14                      Date Sampled : 8/19/98  
Analyst : Chris Casteel                              Date Received : 8/24/98  
Instrument : HP 5989A/Entech 7000                Date Analyzed : 8/29/98  
Matrix : Summa Canister                            Volume(s) Analyzed : 0.000250 Liter(s)

Pi 1 = -2.2  
Pf 1 = 3.0

D.F. = 1.42

CAS #	COMPOUND	RESULT	REPORTING	RESULT	REPORTING
		$\mu\text{g}/\text{M}^3$	LIMIT $\mu\text{g}/\text{M}^3$	ppb	LIMIT ppb
74-87-3	Chloromethane	ND	4,000	ND	2,000
75-01-4	Vinyl Chloride	ND	4,000	ND	1,600
75-00-3	Chloroethane	ND	4,000	ND	1,500
74-83-9	Bromomethane	ND	4,000	ND	1,000
67-64-1	Acetone	ND	4,000	ND	1,700
75-69-4	Trichlorofluoromethane	ND	4,000	ND	720
75-35-4	1,1-Dichloroethene	ND	4,000	ND	1,000
75-09-2	Methylene chloride	ND	4,000	ND	1,200
75-15-0	Carbon Disulfide	ND	4,000	ND	1,300
76-13-1	Trichlorotrifluoroethane	ND	4,000	ND	530
156-60-5	trans-1,2-Dichloroethene	ND	4,000	ND	1,000
156-59-2	cis-1,2-Dichloroethene	ND	4,000	ND	1,000
75-34-3	1,1-Dichloroethane	ND	4,000	ND	1,000
1634-04-4	Methyl tert-Butyl Ether	ND	4,000	ND	1,100
108-05-4	Vinyl Acetate	ND	4,000	ND	1,100
78-93-3	2-Butanone	ND	4,000	ND	1,400
67-66-3	Chloroform	ND	4,000	ND	830
107-06-2	1,2-Dichloroethane	ND	4,000	ND	1,000
71-55-6	1,1,1-Trichloroethane	ND	4,000	ND	740
71-43-2	Benzene	ND	4,000	ND	1,300
56-23-5	Carbon Tetrachloride	ND	4,000	ND	640
78-87-5	1,2-Dichloropropane	ND	4,000	ND	870

TR = Detected Below Indicated Reporting Limit  
ND = Not Detected

Verified by : RG

Date : 9/2/98



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## RESULTS OF ANALYSIS

PAGE 2 OF 3

Client : **BBC International, Inc.**

Client Sample ID : N/A

PAI Sample ID : Method Blank

Test Code : GC/MS EPA TO-14  
Analyst : Chris Casteel  
Instrument : HP 5989A/Entech 7000  
Matrix : Summa Canister

Date Sampled : N/A  
Date Received : N/A  
Date Analyzed : 8/29/98  
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 0.0

D.F. = 1.00

CAS #	COMPOUND	RESULT	REPORTING	RESULT	REPORTING
		$\mu\text{g}/\text{M}^3$	LIMIT $\mu\text{g}/\text{M}^3$	ppb	LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	ND	1.0	ND	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	ND	1.0	ND	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	ND	1.0	ND	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	ND	1.0	ND	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	ND	1.0	ND	0.23
95-47-6	o-Xylene	ND	1.0	ND	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RG

Date : 9/2/98



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## RESULTS OF ANALYSIS (Tentatively Identified Compounds)

PAGE 3 OF 3

Client : BBC International, Inc.

Client Sample ID : TSV-W 6.5'  
PAI Sample ID : P9801474-001

Test Code : GC/MS EPA TO-14  
Analyst : Chris Casteel  
Instrument : HP 5989A/Entech 7000  
Matrix : Summa Canister  
Date Sampled : 8/19/98  
Date Received : 8/24/98  
Date Analyzed : 8/29/98  
Volume(s) Analyzed : 0.000250 Liter(s)

Pi 1 = -2.2  
Pf 1 = 3.0  
D.F. = 1.42

Time	COMPOUND	ESTIMATED CONCENTRATION $\mu\text{g}/\text{M}^3$
14.93	3-Methylhexane	200,000
15.55	Dimethylcyclopentane	300,000
16.93	Methylcyclohexane	900,000
17.56	Trimethylcyclopentane	200,000
17.85	Trimethylcyclopentane	200,000
18.34	2-Methylheptane	300,000
18.64	3-Methylheptane	200,000
19.05	Dimethylcyclohexane	300,000
19.56	Octane	200,000
19.85	Dimethylcyclohexane	200,000
20.64	C9 Branched Alkane	200,000
21.08	Ethylcyclohexane	300,000
21.27	Trimethylcyclohexane	200,000
21.84	C9 Branched Alkane	200,000
22.10	3-Methyloctane	200,000

Verified by : RC

Date : 9/2/98



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## RESULTS OF ANALYSIS

PAGE 1 OF 3

Client : **BBC International, Inc.**

Client Sample ID : N/A

PAI Sample ID : Method Blank

Test Code : GC/MS EPA TO-14  
Analyst : Chris Casteel  
Instrument : HP 5989A/Entech 7000  
Matrix : Summa Canister

Date Sampled : N/A  
Date Received : N/A  
Date Analyzed : 8/29/98  
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 0.0

D.F. = 1.00

CAS #	COMPOUND	RESULT	REPORTING	RESULT	REPORTING
		$\mu\text{g}/\text{M}^3$	LIMIT $\mu\text{g}/\text{M}^3$	ppb	LIMIT ppb
74-87-3	Chloromethane	ND	1.0	ND	0.49
75-01-4	Vinyl Chloride	ND	1.0	ND	0.39
75-00-3	Chloroethane	ND	1.0	ND	0.38
74-83-9	Bromomethane	ND	1.0	ND	0.26
67-64-1	Acetone	ND	1.0	ND	0.42
75-69-4	Trichlorofluoromethane	ND	1.0	ND	0.18
75-35-4	1,1-Dichloroethene	ND	1.0	ND	0.25
75-09-2	Methylene chloride	ND	1.0	ND	0.29
75-15-0	Carbon Disulfide	ND	1.0	ND	0.32
76-13-1	Trichlorotrifluoroethane	ND	1.0	ND	0.13
156-60-5	trans-1,2-Dichloroethene	ND	1.0	ND	0.25
156-59-2	cis-1,2-Dichloroethene	ND	1.0	ND	0.25
75-34-3	1,1-Dichloroethane	ND	1.0	ND	0.25
1634-04-4	Methyl tert-Butyl Ether	ND	1.0	ND	0.28
108-05-4	Vinyl Acetate	ND	1.0	ND	0.28
78-93-3	2-Butanone	ND	1.0	ND	0.34
67-66-3	Chloroform	ND	1.0	ND	0.21
107-06-2	1,2-Dichloroethane	ND	1.0	ND	0.25
71-55-6	1,1,1-Trichloroethane	ND	1.0	ND	0.19
71-43-2	Benzene	ND	1.0	ND	0.31
56-23-5	Carbon Tetrachloride	ND	1.0	ND	0.16
78-87-5	1,2-Dichloropropane	ND	1.0	ND	0.22

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RC

Date : 9/2/98



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## RESULTS OF ANALYSIS

PAGE 2 OF 3

Client : BBC International, Inc.

Client Sample ID : N/A

PAI Sample ID : Method Blank

Test Code : GC/MS EPA TO-14  
Analyst : Chris Casteel  
Instrument : HP 5989A/Entech 7000  
Matrix : Summa Canister

Date Sampled : N/A  
Date Received : N/A  
Date Analyzed : 8/29/98  
Volume(s) Analyzed : 1.000 Liter(s)

Pi 1 = 0.0

Pf 1 = 0.0

D.F. = 1.00

CAS #	COMPOUND	RESULT	REPORTING	RESULT	REPORTING
		$\mu\text{g}/\text{M}^3$	LIMIT $\mu\text{g}/\text{M}^3$	ppb	LIMIT ppb
75-27-4	Bromodichloromethane	ND	1.0	ND	0.15
79-01-6	Trichloroethene	ND	1.0	ND	0.19
10061-01-5	cis-1,3-Dichloropropene	ND	1.0	ND	0.22
108-10-1	4-Methyl-2-pentanone	ND	1.0	ND	0.24
10061-02-6	trans-1,3-Dichloropropene	ND	1.0	ND	0.22
79-00-5	1,1,2-Trichloroethane	ND	1.0	ND	0.19
108-88-3	Toluene	ND	1.0	ND	0.27
124-48-1	Dibromochloromethane	ND	1.0	ND	0.12
591-78-6	2-Hexanone	ND	1.0	ND	0.24
106-93-4	1,2-Dibromoethane	ND	1.0	ND	0.13
127-18-4	Tetrachloroethene	ND	1.0	ND	0.15
108-90-7	Chlorobenzene	ND	1.0	ND	0.22
100-41-4	Ethylbenzene	ND	1.0	ND	0.23
75-25-2	Bromoform	ND	1.0	ND	0.10
100-42-5	Styrene	ND	1.0	ND	0.24
1330-20-7	m,p-Xylenes	ND	1.0	ND	0.23
95-47-6	o-Xylene	ND	1.0	ND	0.23
79-34-5	1,1,2,2-Tetrachloroethane	ND	1.0	ND	0.15
541-73-1	1,3-Dichlorobenzene	ND	1.0	ND	0.17
106-46-7	1,4-Dichlorobenzene	ND	1.0	ND	0.17
95-50-1	1,2-Dichlorobenzene	ND	1.0	ND	0.17

TR = Detected Below Indicated Reporting Limit

ND = Not Detected

Verified by : RC

Date : 9/2/98





# Performance Analytical Inc.

Air Quality Laboratory  
 A Division of Columbia Analytical Services, Inc.  
 An Employee Owned Company

2665 Park Center Drive, Suite D  
 Simi Valley, California 93065  
 Phone (805) 526-7161  
 Fax (805) 526-7270

# Chain of Custody Record Analytical Services Request

Client / Address <b>BBC INTERNATIONAL, Inc.</b> <b>1324 W. MARLAND P.O. BOX 297</b>		Phone (805) 397-0397 Fax 397-0397 397-6388		PAL Project No. 1501474	
Client Project Name / Location <b>HOBBS, NM 88241</b> <b>Shell Tasker Site, Hobbs, N.M.</b>		Client Project No. <b>MPA TO-14</b>		ANALYSES	
Contact <b>CLIFF BRUNSON</b>	Sampler (Signature) <i>[Signature]</i>	P. O. No. <b>Verbal-Cliff</b>	Container ID (Serial#)	Regulator ID (Serial#)	Remarks
Date Collected <b>8/19/98</b>	Time Collected <b>13:30</b>	Lab Sample No. <b>-001</b>	Type of Sample <b>SOIL VAPOR</b>	Container ID (Serial#) <b>00374</b>	Expected Turnaround Time <b>56 business days</b>
Relinquished by: (Signature) <i>[Signature]</i>		Date <b>8/19/98</b>		Time <b>5:00pm</b>	
Relinquished by: (Signature)		Date		Time	
Relinquished by: (Signature)		Date		Time	

White Copy : Accompanies Sampler

Yellow Copy : Sampler

Table 3 - Soil Laboratory Results

Analyte	Method	GSB-1 58-50' Sample: 105072 mg/Kg	GSB-1B 63-65' Sample: 105074 mg/Kg	GSB-2 45-47' Sample: 105225 mg/Kg	GSB-2 55-57' Sample: 105226 mg/Kg	GSB-3 38-40' Sample: 107013 mg/Kg	GSB-3 48-50' Sample: 107014 mg/Kg	GSB-3D 48-50' Sample: 107015 mg/Kg	GSB-4 48-50' Sample: 107003 mg/Kg	GSB-4 57-59' Sample: 107004 mg/Kg	GSB-4D 57-59' Sample: 107005 mg/Kg	GSB-5 18-20' Sample: 106263 mg/Kg	GSB-5 38-40' Sample: 106264 mg/Kg	GSB-6 18-20' Sample: 106829 mg/Kg	GSB-6 38-40' Sample: 106830 mg/Kg	GSB-7 33-35' Sample: 106260 mg/Kg	GSB-7 58-60' Sample: 106261 mg/Kg	GSB-8 43-45' Sample: 107017 mg/Kg
MTBE	S 8021B			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	S 8021B	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	S 8021B	ND	ND	0.101	0.481	5.69	2.07	2.07	0.400	5.54	10.3	ND						
Ethylbenzene	S 8021B	ND	ND	0.125	0.296	1.78	1.1	2.80	3.21	1.79	2.17	ND	ND	ND	ND	0.433	ND	0.558
m,p,o-xylene	S 8021B	0.857	0.075	1.25	2.62	7.20	8.0	18.4	21.3	6.13	9.56	ND	ND	ND	0.162	2.42	ND	4.04
TRPHC	S 418.1	1,770	274	870	1,020	4,030	771	1,890	2,900	5,340	5,720	ND	ND	ND	ND	692	ND	1,350
Chloride	E 300.0	ND	13	26	37	140	37	52	40	66	77	150	120	75	11	37	11	100

Analyte	Method	GSB-8 57-59' Sample: 107018 mg/Kg	GSB-8D 57-59' Sample: 107019 mg/Kg	GSB-9 13-15' Sample: 106787 mg/Kg	GSB-9 50-52' Sample: 106788 mg/Kg	GSB-10 3-5' Sample: 106790 mg/Kg	GSB-10 50-52' Sample: 106791 mg/Kg	GSB-11 2-3' Sample: 107160 mg/Kg	GSB-11 48-50' Sample: 107161 mg/Kg	CSS 1 0-1' Sample: 103639 mg/Kg	CSS 2 0-1' Sample: 103640 mg/Kg	CSS 3 0-1' Sample: 103641 mg/Kg	CSS 4 0-1' Sample: 103642 mg/Kg	CSS 5 0-1' Sample: 103643 mg/Kg	CSS 7 0-1' Sample: 103644 mg/Kg	CSS 8 0-1' Sample: 104146 mg/Kg	TSB-1 43-45' Sample: 105961 mg/Kg	TSB-7 28-30' Sample: 106028 mg/Kg	TSB-10 28-31' Sample: 106032 mg/Kg
MTBE	S 8021B	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	S 8021B	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	S 8021B	5.69	2.81	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	S 8021B	1.78	4.27	0.93	0.546	2.48	0.577	0.309	0.694	ND	ND	ND							
m,p,o-xylene	S 8021B	7.20	34.6	6.48	4.24	15.8	4.31	3.25	7.41	ND	ND	ND							
TRPHC	S 418.1	4,030	6,380	2,050	2,310	3,960	2,920	704	1,990	460	222	39.8	24.7	19.2	55.0	ND	17.4	ND	ND
Chloride	E 300.0	140	140	32	96	150	54	22	140	7.6									51

ND = Not Detected. See Laboratory Analysis in Appendix V for detection limits.

Table 3 - Soil Laboratory Results

Analyte	Method	GMW-2 3'	GMW-2 13-15'	GMW-2 58-60	GMW-2 62-64D	GMW-3 53-55'	GMW-3 63-65'	GMW-4 18-20'	GMW-4 63-65'	GMW-5 58-60'	GMW-5 63-65'	GW-6 3-5'	GMW-6 63-65'	GMW-7 48-50'	GMW-7 63-65'	GMW-8 28-30'	GMW-8 63-65'	GMW-9 8-10'	GMW-9 63-65'	GMW-9D 63-65'	GMW-10 3-5'	GMW-10 63-65'	CSS #6 0-1'
		Sample: 106823	Sample: 103766	Sample: 103765	Sample: 103764	Sample: 104147	Sample: 104148	Sample: 104099	Sample: 104100	Sample: 104339	Sample: 104340	Sample: 104532	Sample: 104533	Sample: 104633	Sample: 104948	Sample: 104949	Sample: 106457	Sample: 106458	Sample: 106459	Sample: 106342	Sample: 106343	Sample: 106645	
		mg/Kg	mg/Kg																				
Benzidine	S-8270C		ND	ND																			
Hexachlorobenzene	S-8270C		ND	ND																			
Pentachlorobenzene	S-8270C		ND	ND																			
1,2,4,5-tetrachlorobenzene	S-8270C		ND	ND																			
Hexachloroethane	S-8270C		ND	ND																			
2,4-dichlorophenol	S-8270C		ND	ND																			
2,4,5-trichlorophenol	S-8270C		ND	ND																			
2,4,6-trichlorophenol	S-8270C		ND	ND																			
bis (2-chloroethyl) ether	S-8270C		ND	ND																			
bis (2-chloroisopropyl) ether	S-8270C		ND	ND																			
bis (chloromethyl) ether	S-8270C		ND	ND																			
3,3-dichlorobenzidine	S-8270C		ND	ND																			
2,4-dinitrotoluene	S-8270C		ND	ND																			
Diphenylhydrazine	S-8270C		ND	ND																			
Hexachlorobutadiene	S-8270C		ND	ND																			
Hexachlorocyclopentadiene	S-8270C		ND	ND																			
Isophorone	S-8270C		ND	ND																			
Nitrobenzene	S-8270C		ND	ND																			
2,4-dinitro-o-cresol	S-8270C		ND	ND																			
2,4-dinitrophenols	S-8270C		ND	ND																			
n-nitrosodiethylamine	S-8270C		ND	ND																			
N-nitrosodimethylamine	S-8270C		ND	ND																			
N-nitrosodibutylamine	S-8270C		ND	ND																			
N-nitrosodiphenylamine	S-8270C		ND	ND																			
N-nitrosopyrrolidine	S-8270C		ND	ND																			
Pentachlorophenol	S-8270C		ND	ND																			
Dibutyl phthalate	S-8270C		ND	ND																			
di-2-ethylhexyl phthalate	S-8270C		ND	ND																			
Diethyl phthalate	S-8270C		ND	ND																			
Dimethyl phthalate	S-8270C		ND	ND																			
Anthracene	S-8270C		ND	ND																			
3,4-benzofluoranthene	S-8270C		ND	ND																			

ND = Not Detected. See Laboratory Analysis in Appendix V for detection limits.  
GMW-2 is metals background sample, not analyzed for other compounds.





Table 3 - Soil Laboratory Results

Analyte	Method	GMW-2	GMW-2	GMW-2	GMW-2	GMW-2	GMW-3	GMW-3	GMW-3	GMW-4	GMW-4	GMW-4	GMW-5	GMW-5	GMW-5	GMW-6	GMW-7	GMW-7	GMW-7	GMW-8	GMW-8	GMW-8	GMW-9	GMW-9	GMW-9	GMW-10	GMW-10	GMW-10	CSS #6
		3'	13-15'	58-60'	62-64D	62-64D	53-55'	63-65'	18-20'	63-65'	58-60'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	63-65'	0-1'
		Sample: 106823	Sample: 103766	Sample: 103765	Sample: 103764	Sample: 104147	Sample: 104148	Sample: 104099	Sample: 104100	Sample: 104339	Sample: 104340	Sample: 104532	Sample: 104533	Sample: 104633	Sample: 104634	Sample: 104948	Sample: 104949	Sample: 106457	Sample: 106458	Sample: 106459	Sample: 106342	Sample: 106343	Sample: 106342						
		mg/Kg																											
			0.25	11	3.8	9.5	7.5	6.5	2.75	7.8	ND	ND	ND	3.75	4.0	3.5	1.5	2.4	3.8	1.8	5.1	3.08	7.04	23.4	5.1	23.4	5.1	1.5	
Total Phenols	SM 5530 A,D	pCl/gm																											
Total Activity	E 901.1M		13.32	40.61	11.48	4.80	4.34	1.67	13.32	4.33	3.59	2.38	17.62	6.55	4.13	6.14	14.47	5.84	4.92	3.08	7.04	23.4	5.1	23.4	5.1	23.4	5.1	1.5	

\*\*\* NOTE: Samples extracted past holding times. Middle and closing CCVs were out of acceptance criteria, biased high. Relative Percent Difference between MS and MSD out of acceptance criteria.

ND = Not Detected. See Laboratory Analysis in Appendix V for detection limits. GMW-2 is metals background sample, not analyzed for other compounds.



## Air Quality Corrective Action & Health Plan Grimes Battery & Tasker Road - Hobbs, New Mexico

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### Procedures:

- 1.) A photo ionization detector (PID) will be on site at all times to monitor for fugitive volatile organic compounds (VOCs). A ToxicRae PGM-30D instrument will be used to monitor the air.
- 2.) The vapors to be monitored are: toluene, benzene, and xylene. The action limits are:

TWA:	10ppm
STEL:	25 ppm
Low:	50 ppm
High:	100 ppm
- 3.) The PID will be on at all times and will be placed near excavation sites and will be used to monitor the site area in a walk around of the site perimeter periodically.
- 4.) The readings will be instantaneous and all readings will be data-logged at an interval of every 60 seconds. All data-logging information will be down loaded to a PC after completion of site activities. Print outs will be generated.
- 5.) Corrective Action: In the event fugitive emissions exceed alarm limits continuously, all site excavation activities will be suspended, fresh soil placed on top of the emission source, the OCD notified, home office notified, and any residents potentially affected will be notified.
- 6.) Project Manager:                      Cliff P. Brunson/Joe Frank Dean, BBC International, Inc.
- 7.) Site phone number:                      (505) 390-6102
- 8.) Emergency Phone Numbers:    397-6388 (24 hrs.) - BBC International, Inc.  
   911 - (Police, Fire, Ambulance)  
   392-5571 - Dr. Hood (company Doctor)  
   392-9212 - Columbia Lea Regional Medical Center
- 9.) Safety Coordinator - Terry Brem - 393-6169
- 10.) H<sub>2</sub>S monitors will be in place or on person while on location at all times.
- 11.) 3 gas monitor will be on location at all times.
- 12.) A photo ionization detector will be on site at all times to monitor for volatile organic compounds (VOCs).
- 13.) A first aid kit will be on location at all times.
- 14.) All first aid injuries or needs will be reported to the Site Project Manager first, then further action will be taken if necessary.
- 15.) All personnel will have personal protection equipment (PPE). As a minimum, hard hats, steel toe safety shoes, gloves, and safety glasses.





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 ENVIRONMENTAL BUREAU  
 OIL CONSERVATION DIVISION

- LEGEND
- DENOTES EXISTING RESIDENCE
  - DENOTES PROPOSED PARK CARVE-OUT
  - TSV - DENOTES TASKER SOIL VAPOR



**BBC INTERNATIONAL, INC.**

**TASKER ROAD**  
 SOIL VAPOR SAMPLE POINTS  
 PERRY HOME AND LOT  
 IN SECTION 28  
 TOWNSHIP 18 SOUTH,  
 RANGE 38 EAST, N.M.P.M.,  
 LEA COUNTY, NEW MEXICO.

SURVEYED BY: LAWLESS	DRAWN BY: D. MCARLEY	REV. DATE: 12/24/98	Drawing Number
DATE BEGN: 5/11/98	DATE: 8/13/98	FILE NAME: 0738TASK	D-847
DATE END: 9/1/98	CHECKED BY:	SHEET 1 OF 1	<b>FIGURE 5</b>
PROJECT #: 98110738	DISK #: BBC	Scale: 1"=10'	

  
**JOHN WEST SURVEYING COMPANY**  
 HOBBS, NEW MEXICO  
**BBC INTERNATIONAL, INC.**  
 HOBBS, NEW MEXICO



NOTE:  
 THE INFORMATION AND INTERPRETATION CONTAINED ON THIS MAP ARE PRELIMINARY. THE MAP INTERPRETATION MAY CHANGE WHEN ADDITIONAL INFORMATION AND DATA IS DEVELOPED.

LEGEND  
 SOIL VAPOR  
 TPH CONCENTRATION

- = 1-5 PPM
- = 6-10 PPM
- = 11-100 PPM
- = > 100



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 OIL CONSERVATION DIVISION



BBC INTERNATIONAL INC.

SOIL VAPOR SURVEY SAMPLE POINTS—100 FOOT GRID SPACED, FIRST, SECOND, AND THIRD UNITS OF WESTGATE ADDITIONS, LOCATED IN THE WEST HALF OF SECTION 28, TOWNSHIP 18 SOUTH, RANGE 88 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.

Surveyed by: LAKLESS	Drawn by: JWP/GRCC	Last Rev: 12/20/98
Date: 5/11/98	Date: 5/12/98	Scale: 800'
Scale: 800'	Approved by:	Sheet: 14
Project #: 9810258	Electronic: 0258-14	

FIGURE 14





NOTE:  
THE INFORMATION AND  
INTERPRETATION CONTAINED  
ON THIS MAP ARE PRELIMINARY.  
THE MAP INTERPRETATION MAY  
CHANGE WHEN ADDITIONAL  
INFORMATION AND DATA IS  
DEVELOPED.

- LEGEND
- DENOTES EXCAVATED AREA
  - DENOTES PROPOSED PARK CARVE-OUT
  - DENOTES EXISTING RESIDENCE
  - DENOTES DIRT LEASE ROAD
  - TMW - DENOTES TASKER MONITOR WELL
  - GMW - DENOTES GRIMES MONITOR WELL



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OIL CONSERVATION DIVISION



BBC INTERNATIONAL, INC.  
GRIMES BATTERY & TASKER ROAD  
GROUND WATER ELEVATIONS & GRADIENT  
LOCATIONS IN SECTION 28  
TOWNSHIP 18 SOUTH,  
RANGE 38 EAST, N.M.P.M.,  
LEA COUNTY, NEW MEXICO.

JOHN WEST SURVEYING COMPANY  
HOBBS, NEW MEXICO



SURVEYED BY: LAWLESS	DRAWN BY: D.McCARLEY	REV. DATE: 9/8/98	D-847
DATE BEGN: 5/11/98	DATE: 8/13/98	FILE NAME: 07387-G	
DATE END: 8/1/98	CHECKED BY:	SHEET 1 OF 1	FIGURE 15
PROJECT #: 98110738	DSK #: BBC	Scale: 1"=30'	