# AP-013

# GENERAL CORRESPONDENCE

YEAR(S): 2007-1998



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

UB 11/8

December 7, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: 5051-3921

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: TNM-97-18 STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13)

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed the following EOTT Energy Pipeline Limited Partnership (EOTT) documents:

- October 4, 2000 "NOTICE OF PUBLICATION, GROUNDWATER ABATEMENT PLAN (AP-13), TNM-97-18 SITE, LEA COUNTY, NEW MEXICO" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc.
- June 27, 2000 "PETROLEUM RELEASE SITE TNM 97-18, SW1/4, NE1/4 SECTION 28, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, ADDITIONAL INFORMATION REQUESTED FOR STAGE 1 ABATEMENT PLAN" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc.
- January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13), TNM-97-18 SITE".

These documents contain the results of EOTT's initial investigation of soil and ground water contamination resulting from a crude oil pipeline spill at EOTT's TNM-97-18 site located in Unit G, Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The documents also contain EOTT's Stage 1 Abatement Plan Proposal to complete the definition of the extent of soil and ground water contamination at the site and proof of public notice of the Stage 1 Plan. The OCD has the following comments and requests for information regarding the June 27, 2000 document:

1. The document contains the results of a geoprobe survey of soils at the site. However, the data shows that the extent of soil contamination has not been completely defined. Please provide a plan to completely determine the extent of soil contamination.

- 2. The document indicates that 2 additional monitor wells (MW-4 and MW-5) were installed at the site, but there is no reference to the analytical results of soil or water quality sampling of these wells. Please provide this information.
- 3. The document proposes to install 3 additional monitoring wells to determine the downgradient extent of ground water contamination and states that the locations of the wells can be found on the attached map. However, only 1 proposed monitor well location can be found on the attached map. Please provide a corrected map showing the proposed locations of the 3 additional monitor wells.

Please submit the above information to the OCD Santa Fe Office by January 7, 2000 with a copy provided to the OCD Hobbs District Office.

If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,

William C. Olson

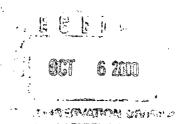
Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

Jesse Taylor, Environmental Technology Group, Inc.

October 4, 2000





Roger C. Anderson **Environmental Bureau Chief** Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 S. Pacheco Santa Fe, New Mexico 87505

Re: Notice of Publication

Groundwater Abatement Plan (AP-13)

TNM-97-18-Site

Lea County, New Mexico

Dear Mr. Anderson:

In accordance with Oil Conservation Division Rule 19.G.(1).(a,b,c,d,e), written notice has been forwarded to the following persons and officials, identified by Rule 19 and the Director, who are required to be notified or who have requested notification. Enclosed are the Affidavits of Publication for Hobbs News-Sun, Albuquerque Journal, and Lovington Daily Leader and a copy of the Notice of Publication for your files.

If additional information is needed, please contact me at (505) 397-4882 or FAX (505) 397-4701.

Sincerely,

Beth A. Aldrich

Geologist

Attachments: Affidavit of Publication, Hobbs News-Sun

Affidavit of Publication, Albuquerque Journal Affidavit of Publication, Lovington Daily Leader

Notice of Publication

Cc: State Land Office, Hobbs District

Chris Shuey, Southwest Research & Information Center

Director, State Park & Recreation Marcia Simmons, KOAT-RV

Dr. Jay Sorenson

Bob Steele, Land & Mineral Resources

Westinghouse Electric Corp., Manager-Uranium Resources Div.

George Vlahos, Sierra Club Lee Wilson & Associates

Secretary, New Mexico Environment Department

Thomas Kellahin

Director, Department of Game & Fish Jackie Jennings, Core Laboratories, Inc. Olson Plunck, Southwestern Pubic Service Soil and Water Conservation Bureau

Environmental Affairs, Public Service Company

Governor, Pueblo of Laguna

State Engineer, Water Resources Division

State Director, Bureau Of Land Management

NM Citizens, Clean Air & Water

William F. Carr, Campbell & Black

NM Municipal League

Jay Lazarus

Sec.

Director, Water Resources Dept.

NM Water Well Association

Field Supervisor, US Fish & Wildlife Service

Patricia A. D'Andrea

Bruce S. Garber, Attorney at Law

Mike Matush, State Land Office Building

Science Applications, Inc.

Dr. Harry Bishara

Director, Albuquerque Environmental Health Department

John Draper, Montgomery & Andrews

Perry Pearce, Burlington Resources

Lynn Brandvold, NM Bureau of Mines & Mineral Resources

Kay Grotbeck

Jeanne Haffen, El Paso Natural Gas

Richard P. Chagnon, Hydrologist

Regional Forester, USFS Regional Office

Director, Colorado River Comm. of Nevada

Gerald R. Zimmerman, Colorado River Board of Calif.

Director, Division of Water Quality (Utah)

Jack A. Barnett, Colorado River Basin Ctrl. Forum

Chief, Groundwater Bureau (Santa Fe, NM)

Chief, Hazardous Waste Bureau (Santa Fe, NM)

Thomas W. Merlan, Director

Chester Rail

Ken Marsh, Controlled Recovery Inc.

Colin Adams, Environmental Counsel

Devon E. Jercinovic, International Technology Corp.

NM Oil & Gas Association

Len Oyenque, The Tewa Company

William Turner, New Mexico Trustee for Natural Resources

Glen Waldrop, EOTT Energy Pipeline Limited Partnership

Millard Deck Estate

Lea Partners

S-W Cattle Company

Jimmie Cooper

Jimmie T. Cooper

**Dale Cooper Family Trust** 

New Mexico State Land Office

**Bureau Of Land Management** 

Lea County Commission

ETGI file

### AFFIDAVIT OF PUBLICATION

State of New Mexico, County of Lea.

#### I. KATHI BEARDEN

September 29

2000

Publisher
Sworn and subscribed to before

me this 29th day of

September

2000

Notary Public.

My Commission expires October 18, 2000 (Seal) LEGAL NOTICE
September 29, 2000
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL
RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oli Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

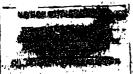
EOTT Energy Umited Pamership (EOTT), Glenn Waldroop, Project Manager, Telephone (915) 684-3463, P.O. Box 1660, Midland, Texas, 79702, has submitted a Stage 1 Abatement Plan Proposal for the TNM 97-18 Leak Sits, located south of Monument, New Mexico, In SW 1/4, NE 1/4, Section 28, Township 20 South, Range 37 East, Lea County, New Mexico. EOTT operates a crude oil pipeline at the site. Phase separated hydrocarbons (PSH) have been observed on the ground water. The Stage 1 Abatement Plan Proposal presents EOTT's proposed methods for remediation of the elte including remediation of the contaminated soils: remediation of contaminated ground water; site maintenance activities; a monitoring and sampling plan for soils and ground water; preparation of regular remediation reports: and a schedule for implement of all remediation and monitoring activities.

Any interested person may obtain frurher information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that includes reasons why a hearing should be held. The Stage 3 Abatment Plan Proposal may be viewed at the above address or at the Oil Conservation Division Hobbs District Office, 1825; N. French Drive, Hobbs, New Mexico, 88240, Telephone (505) 393-8161 between 6:00a.m. and 4:00p.m.. Monday through Friday. Prior to rulling on any Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow statement the proposal of the Oil Conservation Division shall allow statement the proposal of the Oil Conservation Division shall allow statement the proposal of the Oil Conservation Division of the notice during which written comments or a written request for a hearing may be submitted.

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3. Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

01105268000 01543920 Environmental Technology Group P.O. Box 4845

MIDLAND, TX 79704



Domps, sejterably, pickan het sahrusam in New Meiner Oil Compensation Division Regulature, his children glasse a glassessimmer par frames in 2 April 1990. Consensation Rain Frames in 2 April 1990. Consensation Bulletin 1990. New Maxico 27505, Tolephane (Sub) 827-7131:

EOTT Energy Limited Parametering (EOTT), Glenn Waldrop, Project, Managar, Telephone (918) 1948-833, P.O. Box 1850, Midland, Texase 79728, here submitted a Stage 1 Abetamens Plan Proposal for the TNM 97-78 Leak Site, located south of Monument, New Mestico, le the SW K, NE W. Section 28, Township 20 South, Range 37 Eest, Laz County, New Mexico, EOTT operates a crude oil pipeline at the site. Phase separated hydrogrobate (PSM) have been observed on the ground water. The Bigge 1 Abatement Plan Proposal phasemans EOTTs proposed method to the country of the site in a second of the site in the site of the

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County of Bernalillo Si

Bill Tafoya, being duly sworn, declares and says that he is Classified Advertising Manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for times, the first publication being on the day of the subsequent consecutive publications on

PRICE \$ 33.12

Statement to come at end of month.

ACCOUNT NUMBER <u>C85474</u>

CLA-22-A (R-1/93)

OFFICIAL SEAL

Comina Duncan

NXENIWER TO EXCIL

Commission Ecolosis, 1

### Affidavit of Publication

STATE OF NEW MEXICO

) ss.

**COUNTY OF LEA** 

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertisting Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

	Notice Of Pu	blication
was	published in a regul	ar and entire issue of THE LOV-
ING	TON DAILY LEADER	and not in any supplement there-
of,	for one (1) day	, beginning with the issue of
	eptember 28	_, 2000 and ending with the issue
of	September 28	2000.

And that the cost of publishing said notice is the sum of \$46.69 which sum has been (Paid) as Court Costs.

Subscribed and sworn to before me this 4th day of October 2000.

Debbie Schilling

Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2002

RESOURCES
DEPARTMENT
OIL CONSERVATION

DIVISION
Notice is hereby given that pursuant to New Mexico Oll Conservation Division Regulations the following Stage
Abatement Plan Proposal has been submitted to the Director of the Oll Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

EOTT Energy Limited Partnership (EOTT) Glenn Waldrop, Project Manager, Telephone (915) 684-3453, P.O. Box 1680, Midland, Texas, 79702 has submitted a Stage 1 Abatement Plant Proposal for the TNM 97-18 Leak Site, located south of Monument, New Mexico, in SW1/4, NE1/4, Section 28, Township 20 South, Range 37 East, Lea County New Mexico EOTT operates a crude oil pipeline at the site. Phase separated hydrocarbons (PSH) have been observed on the ground water. The Stage Abatement Plan Proposel presents EOTT's proposed methods for remediation of the site including remediation of the contaminated soils, remediation of contaminated. ground water, site maintenance activities, a monitoring and sampling plan. for soils and ground water, preparation of regular remediation reports; and a schedule for implementation of all remediation and monitoring activi-

Any interested person may obtain further intormation from the Oil Conservation Division and

ties

may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that includes reasons why a hearing should be held. The Stage 1 Abatement viewed at the above Conservation Division Hobbs District Office, 1625 N. French Orive, Hobbs New Mexico, 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday Prior, to ruling on any Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments of a written request for a hearing may be submitted

Published in the Lovington Daily Leader September 28, 2000

LEGAL NOTICE
NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
ENERGY, MINERALS

.... AND NATURAL

#### NOTICE OF PUBLICATION

### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 6, 2000

### <u>CERTIFIED MAIL</u> RETURN RECEIPT NO. 5051-3570

Mr. Glen Waldrop EOTT Energy Pipeline Limited Partnership P.O. Box 1660 Midland, Texas 79702

RE: GROUND WATER ABATEMENT PLAN (AP-13)

**TNM-97-18 SITE** 

LEA COUNTY, NEW MEXICO

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has completed a review of EOTT Energy Pipeline Limited Partnership's (EOTT) June 27, 2000 "PETROLEUM RELEASE SITE TNM 97-18, SW1/4, NE1/4 SECTION 28, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, ADDITIONAL INFORMATION REQUESTED FOR STAGE 1 ABATEMENT PLAN" and January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13), TNM-97-18 SITE" which were submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. These documents contain the results of EOTT's initial investigation of soil and ground water contamination resulting from a crude oil pipeline spill at EOTT's TNM-97-18 site. The documents also contain EOTT's Stage 1 Abatement Plan Proposal to complete the definition of the extent of soil and ground water contamination at the site.

The Stage 1 Abatement Plan Proposal is administratively complete. Before the OCD can complete a review of the proposed Stage 1 Abatement Plan Proposal, the OCD requires that:

- 1. EOTT issue by September 21, 2000 the attached Stage 1 notice of publication in the Albuquerque Journal, the Hobbs News-Sun and the Lovington Daily Leader pursuant to OCD Rule 19.G.(2).
- 2. Prior to issuing public notice, EOTT shall issue written notice of the Stage 1 proposal pursuant to OCD Rule 19.G.(1). Please use the previously supplied 3.5" disk for a listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1).(d). The disk also contains the contact for the New Mexico Trustee for Natural Resources.

Please provide the OCD with proof of publication and proof of written notice as soon as possible upon completing issuance of the written and public notice.

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

RCA/wco

xc: Chris Williams, OCD Hobbs District Office

Jesse Taylor, Environmental Technology Group, Inc.

#### NOTICE OF PUBLICATION

### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

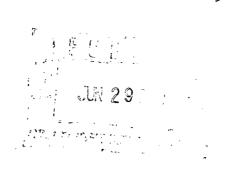
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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Hobbs District Office, 1625 N. French Drive, Hobbs, New Mexico 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments may be submitted.

June 27, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson





RE: Petroleum Release Site TNM 97-18

SW1/4 NE1/4 Section 28, Township 20 South, Range 37 East, Lea County

Additional Information Requested for Stage 1 Abatement Plan

Dear Mr. Olson:

The following information regarding the referenced site is provided in response to your letter, dated April 20, 2000. These data were collected during field activities conducted by Environmental Technology Group, Inc. (ETGI) on behalf of EOTT Energy Corp. (EOTT). The inclusion of this data as an attachment should make the referenced document administratively complete.

- A geoprobe survey of the site was completed between March 16 and March 28, 2000. A total of 10 geoprobe points were advanced to refusal as depicted on the map in Attachment A. Boring logs for each point are also included as Attachment A. The soil laboratory data in tabulated form and the laboratory report for the soil samples are provided as Attachment B. The data indicate that some portion of the released crude oil flowed along the surface topographic low associated with the pipeline right-of-way and pooled in the stained area depicted on the map. It appears that crude oil which collected at this point infiltrated to the ground water as evidenced by the impact observed in monitoring well MW-4.
- The water well inventory is included as Attachment C. The survey indicates that there may be one water well within 1,000 feet of the site.
- In order to define the downgradient extent of ground water impact associated with that observed at monitoring well MW-4, ETGI proposes the installation of three ground water monitoring wells as depicted on the map.

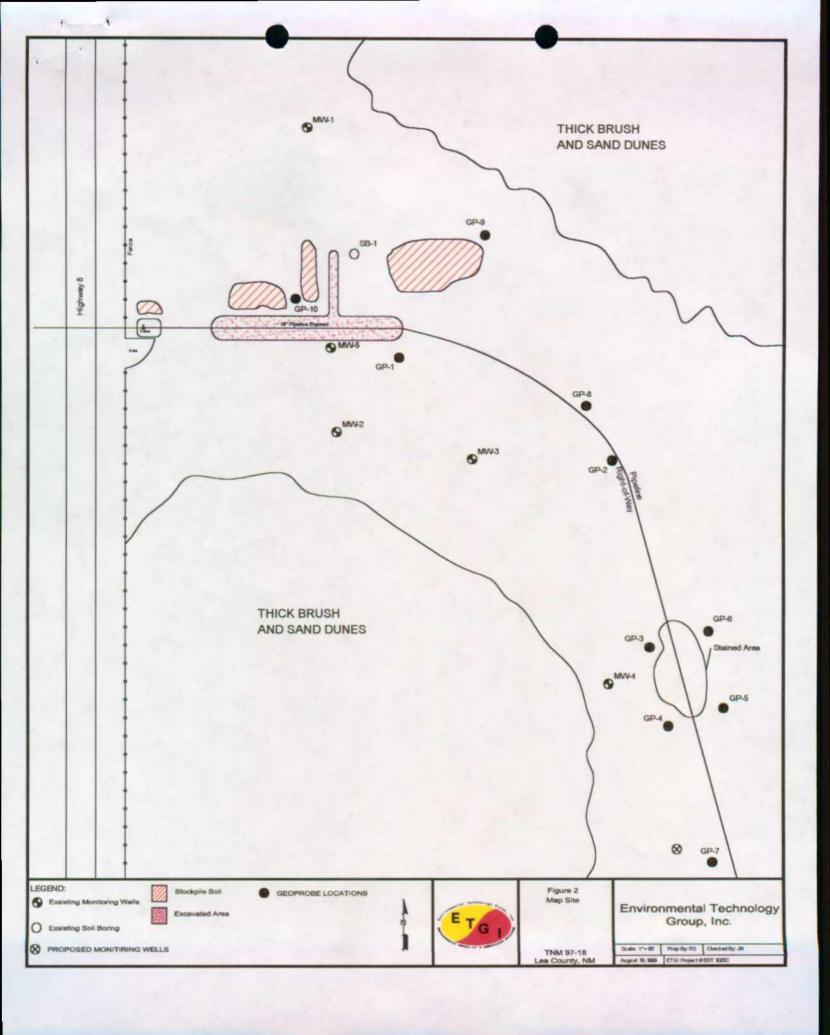
If you have any questions or comments, please telephone me at (915) 664-9166.

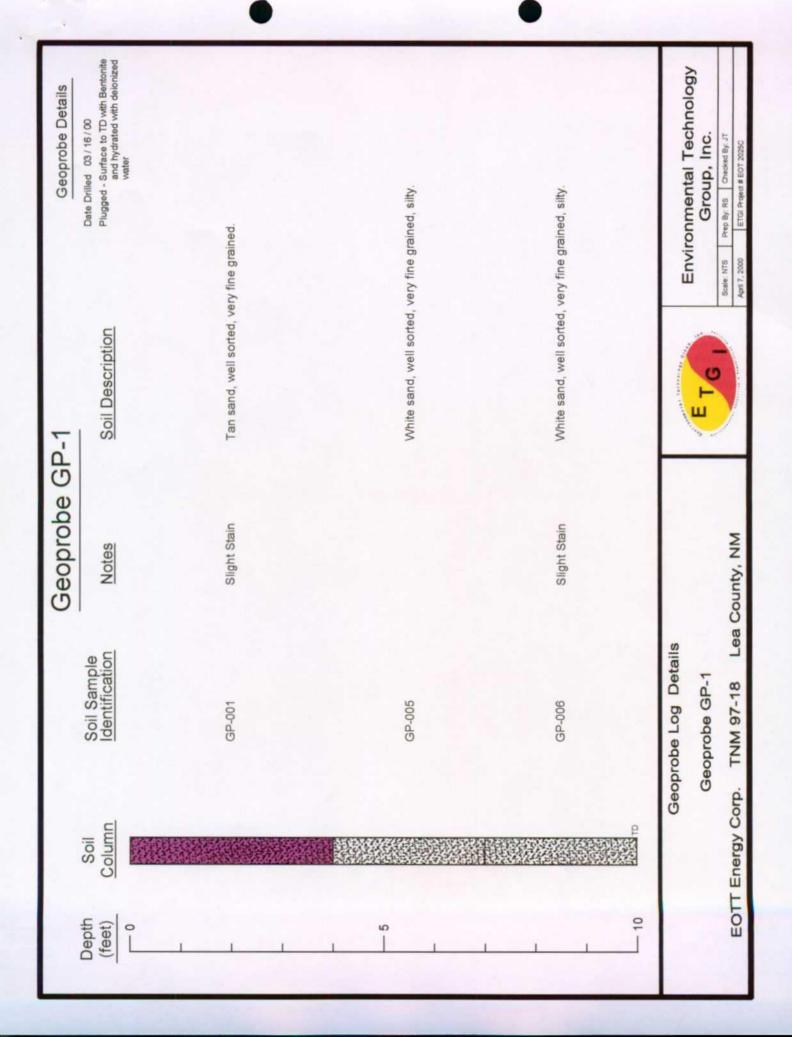
Sincerely; — Jesse Taylor

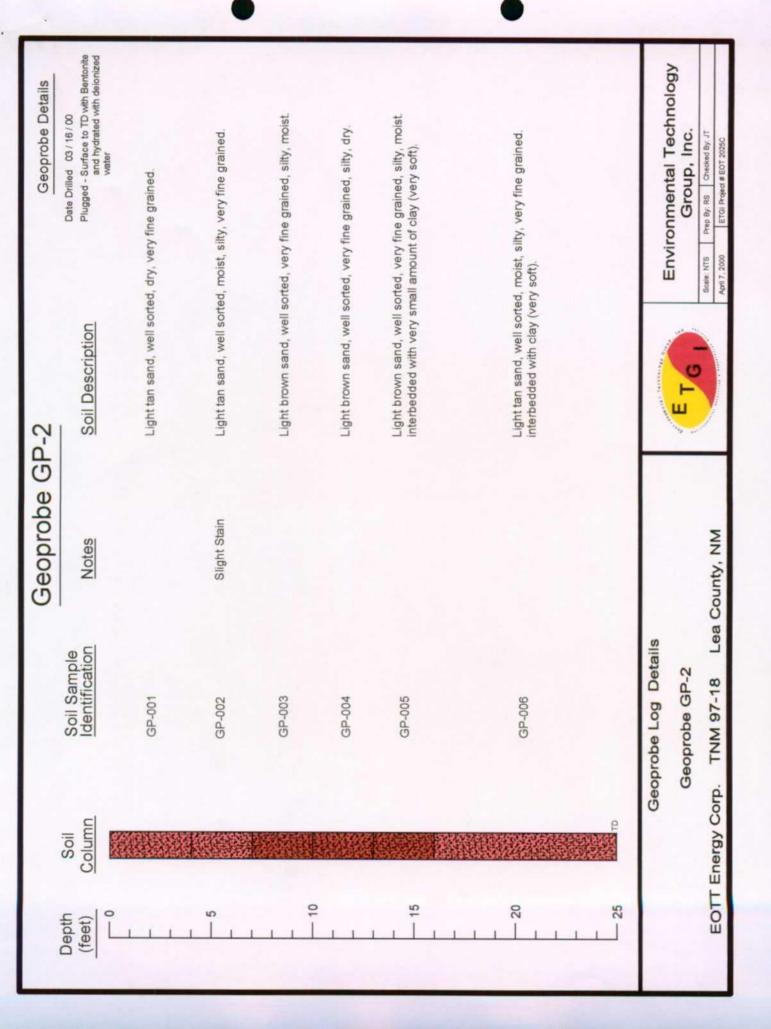
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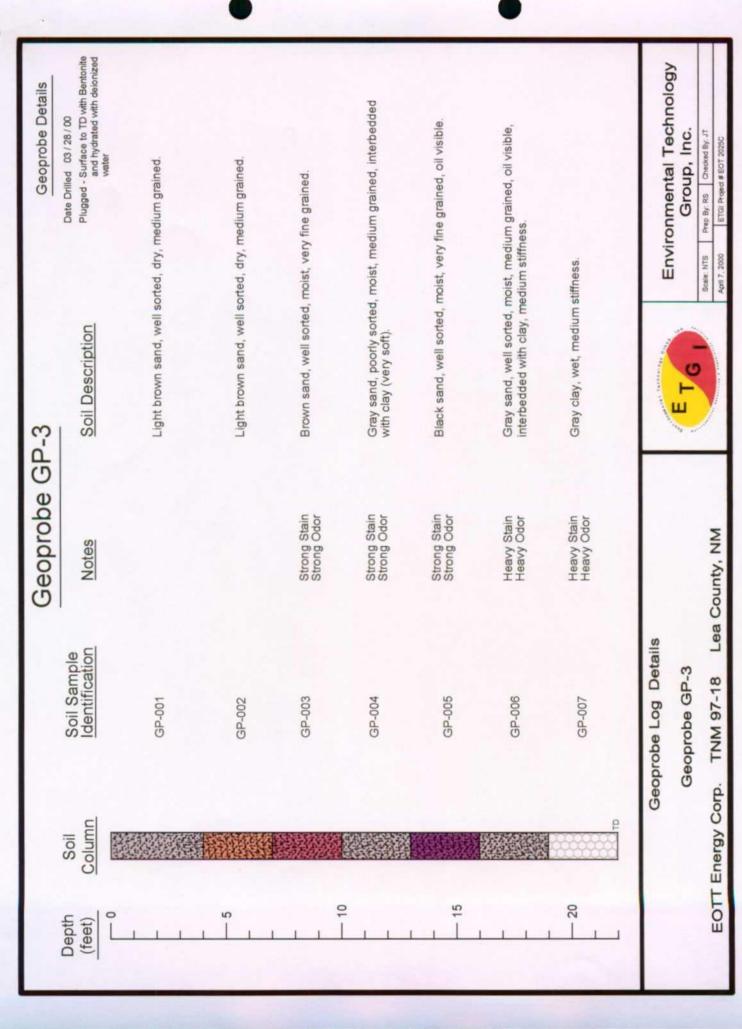
Glenn Waldrop - EOTT Energy Corp.

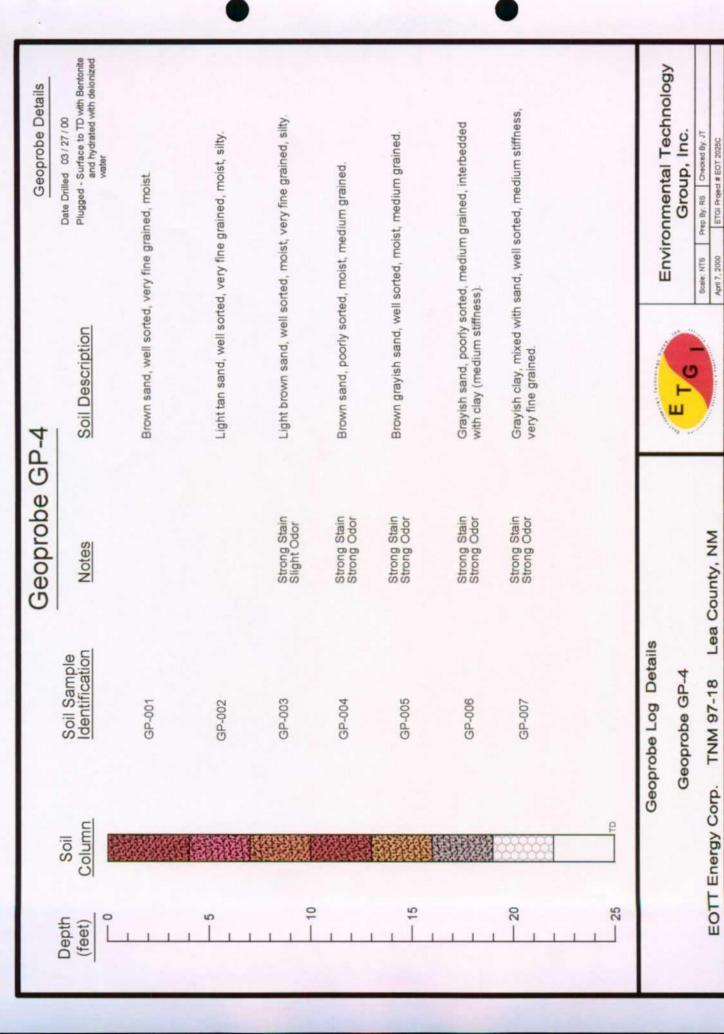
### ATTACHMENT A

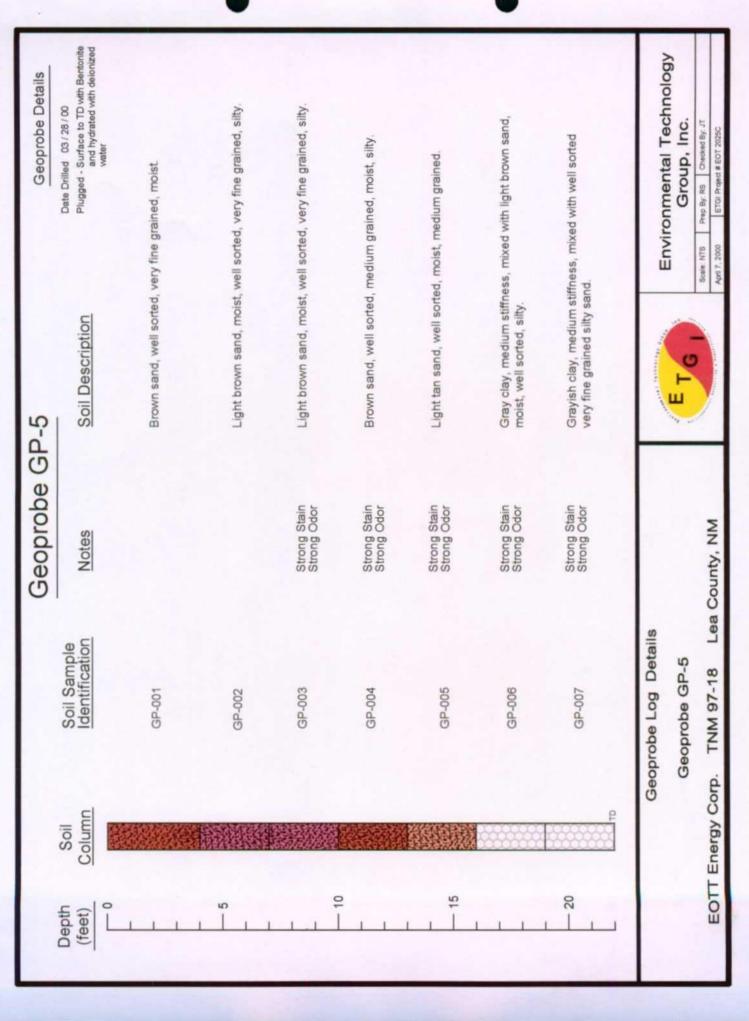


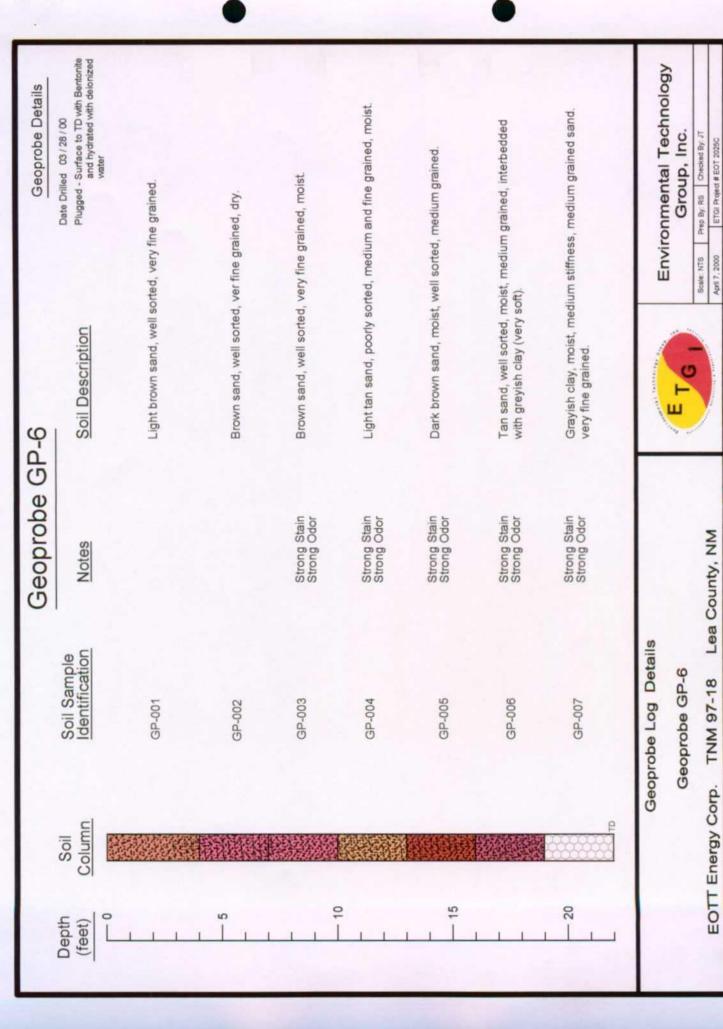


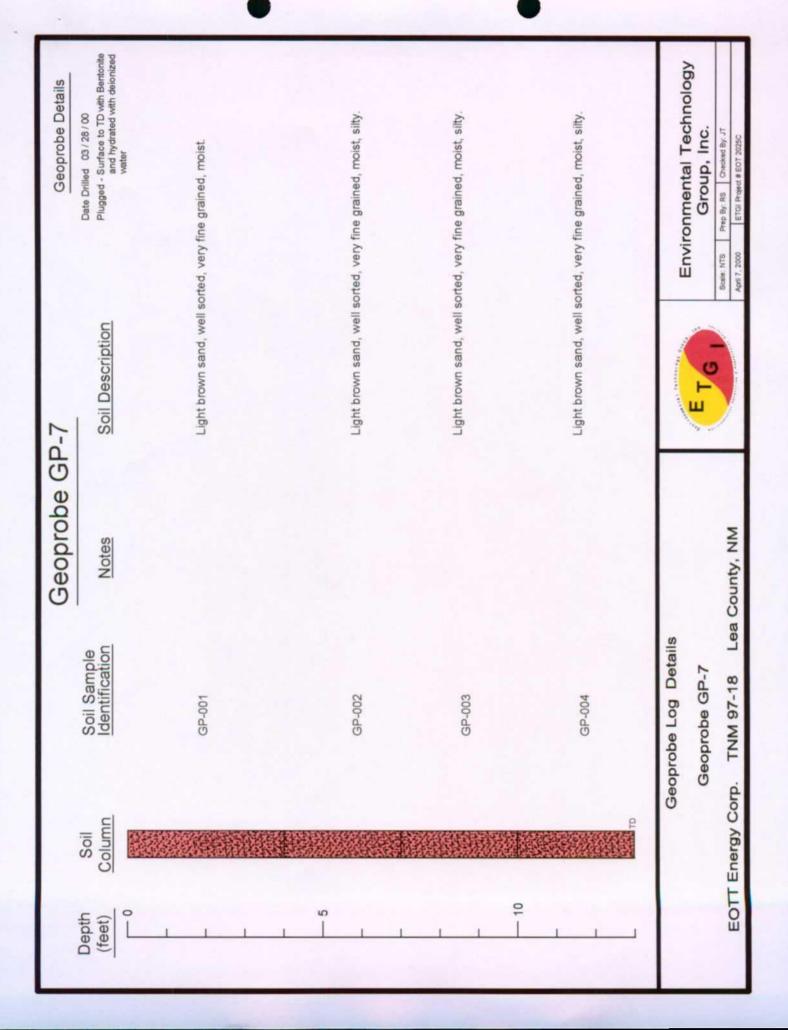


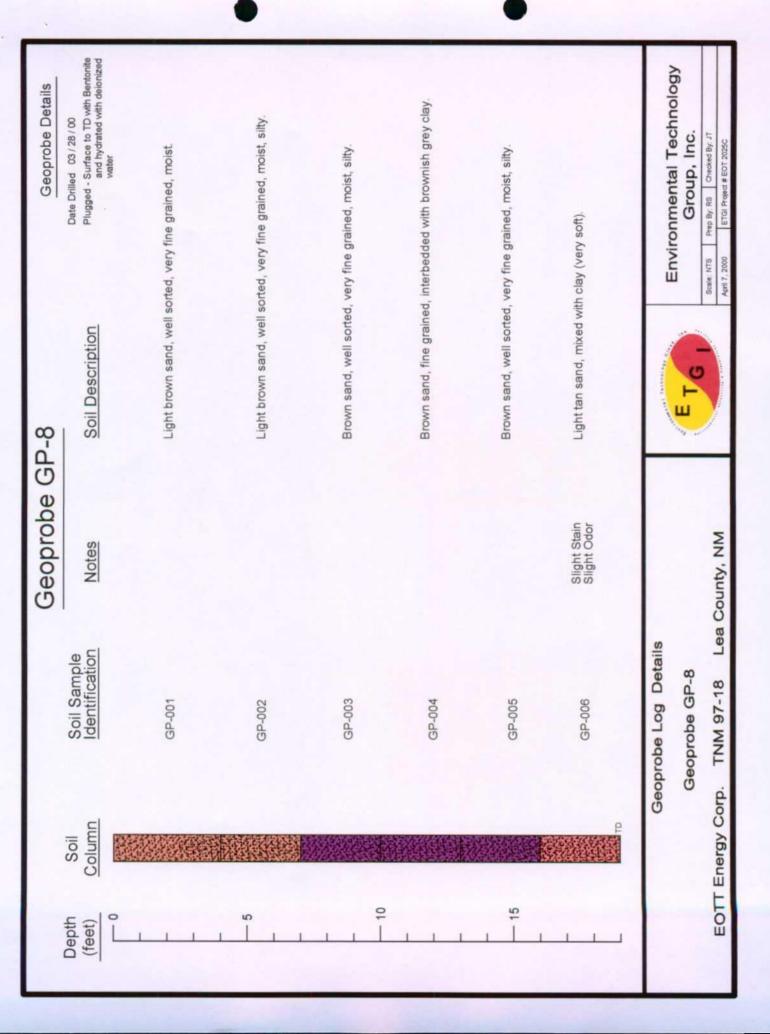


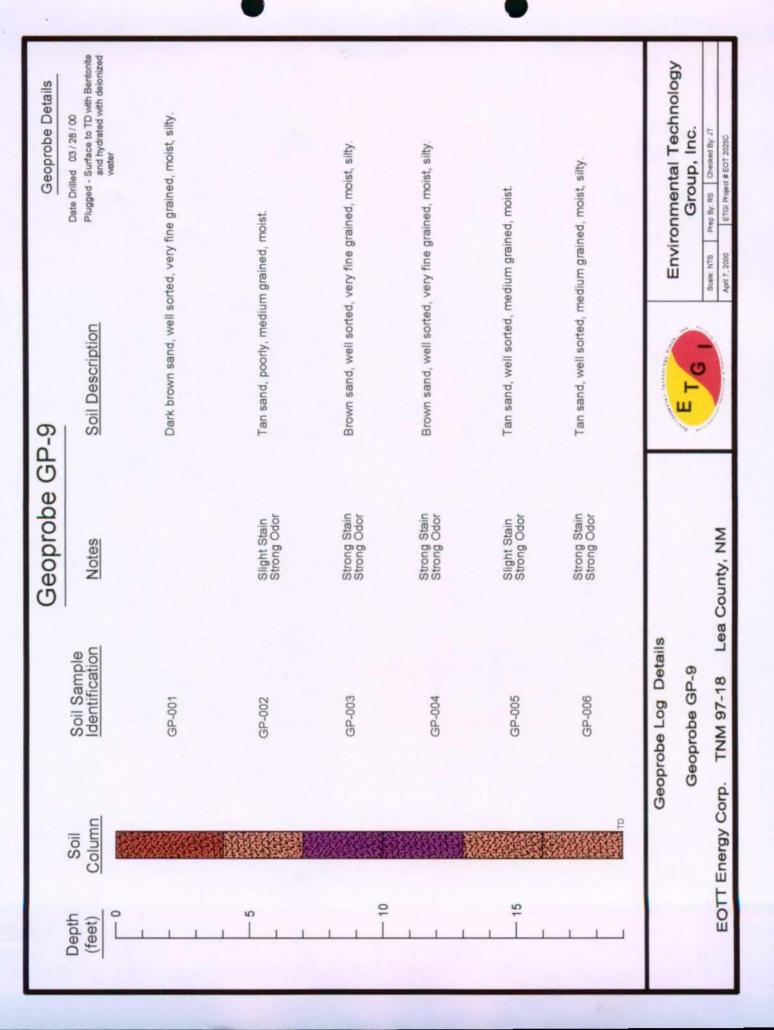


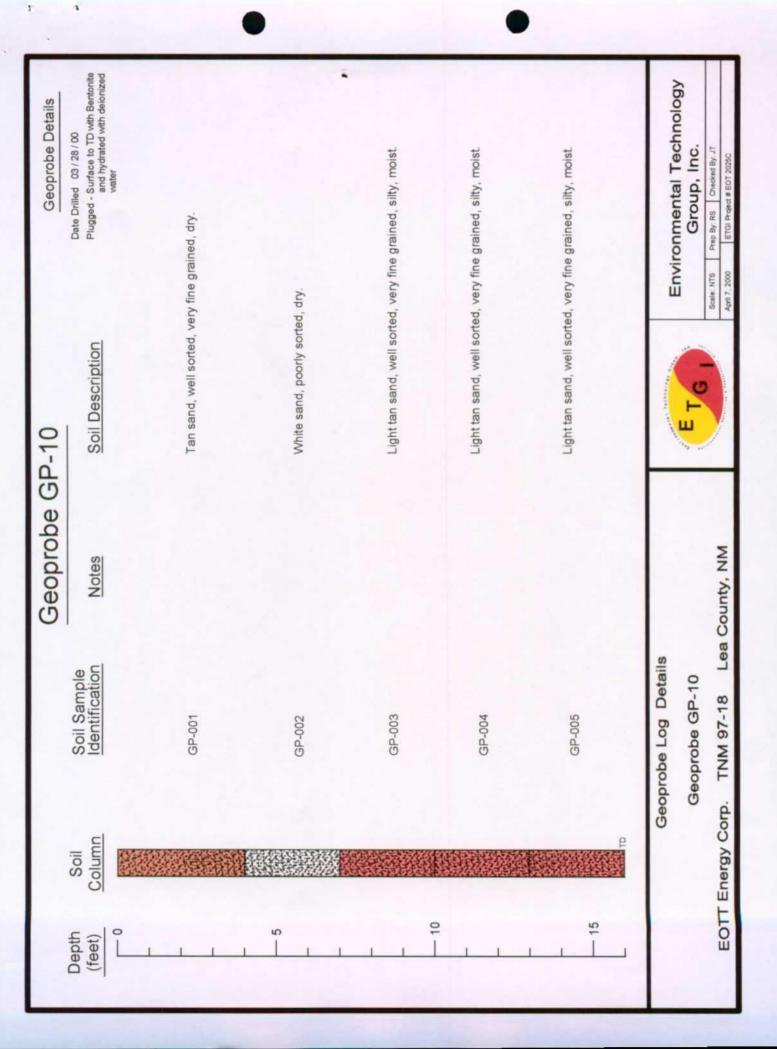












### ATTACHMENT B

TABLE 1

### SUMMARY OF SOIL CHEMISTRY TNM 97-18 RELEASE SITE LEA COUNTY, NM ETGI PROJECT #EOT1025C

SAMPLE	SAMPLE	SAMPLE		Methods: El	PA SW 8746	-8021B, 5030		Me	thods:
LOCATION	DATE	DEPTH	BENZENE	TOLUENE	ETHYL-	m,p-XYLENE	o-XYLENE	EPA SW	846-8015M
		(feet)	(mg/kg)	(mg/kg)	BENZENE	(mg/kg)	(mg/kg)	GR	O/DRO
					(mg/kg)			GRO	DRO
								C6-C10	>C10-C25
								(mg/kg)	(mg/kg)
GP-1	3/16/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	39
GP-1	3/16/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	20
GP-1	3/16/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	1102
GP-2	3/16/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	98
GP-2	3/16/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	40
GP-2	3/16/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	23
GP-2	3/16/00	13'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	37
GP-2	3/16/00	16'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
GP-2	3/16/00	23'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
GP-3	3/16/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
GP-3	3/16/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	192
GP-3	3/16/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	1715
GP-3	3/16/00	13'	<0.100	<0.100	0.489	0.229	0.122	<10	332
GP-3	3/16/00	16'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	126
GP-3	3/16/00	19'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	75
GP-3	3/16/00	22'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	51
GP-6	3/16/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	56
GP-6	3/16/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	679
GP-6	3/16/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	2156
GP-6	3/16/00	13'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	385
GP-6	3/16/00	16'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	161
GP-6	3/16/00	19'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	103
GP-6	3/16/00	22'	<0.100	0.44	1.42	1.24	0.656	<10	112



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

SampleType: Soil

Sample Condition: Intact/ Iced

Project #: EOT 1025C Project Name: TNM 97-18

Project Location: Hwy. 18 New Mexico

Sampling Date: 03/16/00 Receiving Date: 03/27/00 Analysis Date: 3/29 & 3/30/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
24338	GP1 001 4ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24339	GP1 002 7 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24340	GP1 003 10 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24341	GP2 001 4 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24342	GP2 002 7 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24343	GP2 003 10 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24344	GP2 004 13 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24345	GP2 005 16 ft.	<0.100	<0.100	<0.100	< 0.100	<0.100
24346	GP2 006 23 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24347	GP3 001 4 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24348	GP3 002 7 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24349	GP3 003 10 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24350	GP3 004 13 ft.	<0.100	<0.100	0.489	0.229	0.122
24351	GP3 005 16 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24352	GP3 006 19 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24353	GP3 007 22 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24354	GP6 001 4 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24355	GP6 002 7 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24356	GP6 003 10 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24357	GP6 004 13 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24358	GP6 005 16 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24359	GP6 006 19 ft.	<0.100	<0.100	<0.100	<0.100	<0.100
24360	GP6 007 22 ft.	<0.100	0.440	1.42	1.24	0.656
	% IA	102	99	100	103	94
	% EA	99	95	97	100	92
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Baland K Tuttle

 $3 - 31 - \infty$ 



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

Sample Type: Soil

Sample Condition: Intact/Iced

Project #: EOT1025C Project Name: TNM 97-18

Project Location: Hwy. 18 New Mexico

Sampling Date: 03/16/00 Receiving Date: 03/27/00

Analysis Date: 03/28/00

Project L	Location: Hwy. 18 New Mexico			
		GRO	DRO	
		C6-C10	>C10-C28	
ELT#	FIELD CODE	mg/kg	mg/kg	
24338	GP1 001 4ft.	<10	39	
24339	GP1 002 7 ft.	<10	20	
24340	GP1 003 10 ft.	<10	1102	
24341	GP2 001 4 ft.	<10	98	
24342	GP2 002 7 ft.	<10	40	
24343	GP2 003 10 ft.	<10	23	
24344	GP2 004 13 ft.	<10	37	
24345	GP2 005 16 ft.	<10	<10	
24346	GP2 006 23 ft.	<10	<10	
24347	GP3 001 4 ft.	<10	<10	
24348	GP3 002 7 ft.	<10	192	
24349	GP3 003 10 ft.	<10	1715	
24350	GP3 004 13 ft.	<10	332	
24351	GP3 005 16 ft.	<10	126	
24352	GP3 006 19 ft.	<10	75	
24353	GP3 007 22 ft.	<10	51	
24354	GP6 001 4 ft.	<10	56	
24355	GP6 002 7 ft.	<10	679	
24356	GP6 003 10 ft.	<10	2156	
24357	GP6 004 13 ft.	<10	385	
24358	GP6 005 16 ft.	<10	161	
24359	GP6 006 19 ft.	<10	103	
24360	GP6 007 22 ft.	<10	112	
			465	
	%INSTRUMENT ACCURACY	104	106	
	% EXTRACTION ACCURACY	118	118	
	BLANK	<10	<10	

Methods: EPA SW 846-8015M GRO/DRO

Raland K. Tuttle

3-31-00 Date

Environmental Lab of Texas, Inc.	Lab of Tex	₹=4	10 West I-20 East (915) 563-1800	4.4	Odessa, Texas 79763 FAX (915) 563-1713		HAIN		тору	RECOR	CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST	NALYS	Is req	UEST	. `
Project Manager:			Phone #: 915-	-164-9166		-			1474	Vere D	Pallogu Stav 1 ANA		_		
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Project#:			Project Name:				D)1 C								
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Project Location:		S	١	nre:			J PC				976				
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GP1	1301			<b> </b>	3/1	~					×				
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265		402   X	 	<b>×</b>	3,00				-						-
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Relinquished by:	Dates	Tlace:		Received by Laboratory:	Jorr:		•				•				
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Project Manager:			Phone #: 915	Phone #: 915 -664-916 6 EAX #: 5-6 -970-961-1067	7		¥	ANALYSIS REQUEST	QUEST		
Company Name & Address:										·	
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Project#:			Project Name:	···		Вне		- (	יער		
EOT 1025	J		TWM 97	91-18		49 1:			e) /		
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(LAB USE)	FIELD CODE	II COUTY Volumeter WATER	OLHER VIB 2011	HICE HOHE OTHER DATE	TIME	BTEX 8(1 14) 16) 16)	Total Met	TCLP Ser 105 106 <b>15</b>			
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TABLE 1

### SUMMARY OF SOIL CHEMISTRY TNM 97-18 RELEASE SITE LEA COUNTY, NM ETGI PROJECT #EOT1025C

SAMPLE	SAMPLE	SAMPLE		Methods: El	PA SW 8746	-8021B, 5030		Me	thods:
LOCATION	DATE	DEPTH	BENZENE	TOLUENE	ETHYL-	m,p-XYLENE	o-XYLENE	EPA SW	846-8015M
		(feet)	(mg/kg)	(mg/kg)	BENZENE	(mg/kg)	(mg/kg)	GR	O/DRO
i		, ,	` • • • •		(mg/kg)			GRO	DRO
					(337			C6-C10	>C10-C25
								(mg/kg)	(mg/kg)
GP-4	3/28/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	<10
GP-4	3/28/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	64
GP-4	3/28/00	10'	<0.100	<0.100	0.116	0.182	<0.100	98	3940
GP-4	3/28/00	13'	0.193	<0.100	17.6	7.99	5.87	407	1287
GP-4	3/28/00	16'	0.457	5.14	32.8	32.3	12.6	1399	4304
GP-4	3/28/00	19'	0.493	18.1	51.3	56.4	18.4	1357	3763
GP-4	3/28/00	22'	<0.100	6.42	12.0	14.2	5.80	105	63
GP-5	3/28/00	4'	<0.100	<0.100	<0.100	0.107	<0.100	<10	153
GP-5	3/28/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	112
GP-5	3/28/00	10'	<0.100	<0.100	0.243	0.34	<0.100	174	5536
GP-5	3/28/00	13'	0.105	<0.100	17.8	7.44	5.43	959	3660
GP-5	3/28/00	16'	<0.100	3.44	20.6	20.1	9.10	770	2690
GP-5	3/28/00	19'	1.06	36.2	79.2	86.3	34.2	3130	7782
GP-5	3/28/00	22'	0.805	25.2	35.9	37.7	13.2	181	804
GP-7	3/28/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	304
GP-7	3/28/00	7'	<0.100	<0.100	0.187	<0.100	0.238	<10	. 2324
GP-7	3/28/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	261
GP-7	3/28/00	13'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	128
GP-8	3/28/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	53
GP-8	3/28/00	7'	<0.100	<0.100	<0.100	0.121	<0.100	<10	492
GP-8	3/28/00	10'	<0.100	<0.100	<0.100	<0.100	<0.100	11	3624
GP-8	3/28/00	13'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	115
GP-8	3/28/00	16'	<0.100	0.107	<0.100	0.270	0.123	<10	81
GP-8	3/28/00	19'	<0.100	<0.100	1.04	2.01	<0.100	113	1099
GP-9	3/28/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	4322
GP-9	3/28/00	7'	<0.100	<0.100	9.69	15.1	7.13	655	1888
GP-9	3/28/00	10'	<0.100	<0.100	4.43	9.11	3.74	756	2664
GP-9	3/28/00	13'	<0.100	<0.100	11.8	22.7	3.99	2482	6660
GP-9	3/28/00	16'	1.61	<0.100	11.2	20.9	<0.100	476	929
GP-9	3/28/00	19'	<0.100	<0.100	9.11	20.8	<0.100	2364	5114
GP-10	3/28/00	4'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	241
GP-10	3/28/00	7'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	121
GP-10	3/28/00	10'	<0.100	0.190	<0.100	0.214	<0.100	<10	33
GP-10	3/28/00	13'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	50
GP-10	3/28/00	16'	<0.100	<0.100	<0.100	<0.100	<0.100	<10	14



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

SampleType: Soil

Sample Condition: Intact/ Iced

Project #: EOT 1025C Project Name: TNM 97-18

Project Location: Monument, N.M.

Sampling Date: 03/28/00 Receiving Date: 03/29/00

Analysis Date: 3/30, 3/31 & 4/3/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
24393	GP4 001 4	<0.100	<0.100	<0.100	<0.100	<0.100
24394	GP4 002 7	<0.100	<0.100	<0.100	<0.100	<0.100
24395	GP4 003 10	<0.100	<0.100	0.116	0.182	<0.100
24396	GP4 004 13	0.193	<0.100	17.6	7.99	5.87
24397	GP4 005 16	0.457	5.14	32.8	32.3	12.6
24398	GP4 006 19	0.493	18.1	51.3	56.4	18.4
24399	GP4 007 22	<0.100	6.42	12.0	14.2	5.80
24400	GP5 001 4	<0.100	<0.100	<0.100	0.107	<0.100
24401	GP5 002 7	<0.100	<0.100	<0.100	<0.100	<0.100
24402	GP5 003 10	< 0.100	<0.100	0.243	0.340	<0.100
24403	GP5 004 13	0.105	<0.100	17.8	7.44	5.43
24404	GP5 005 16	< 0.100	3.44	20.6	20.1	9.10
24405	GP5 006 19	1.06	36.2	79.2	86.3	34.2
24406	GP5 007 22	0.805	25.2	35.9	37.7	13.2
24407	GP7 001 4	<0.100	<0.100	<0.100	<0.100	<0.100
24408	GP7 002 7	<0.100	<0.100	0.187	< 0.100	0.238
24409	GP7 003 10	<0.100	<0.100	<0.100	<0.100	<0.100
	% IA	99	96	97	99	91
	% EA	103	102	128	134	104
•	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Raland K Tuttle

4-5-00



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

SampleType: Soil

Sample Condition: Intact/ Iced

Project #: EOT 1025C
Project Name: TNM 97-18

Project Location: Monument, N.M.

Sampling Date: 03/28/00 Receiving Date: 03/29/00

Analysis Date: 4/01/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
24410	GP7 004 13	<0.100	<0.100	<0.100	<0.100	<0.100
24411	GP8 001 4	<0.100	<0.100	<0.100	<0.100	<0.100
24412	GP8 002 7	<0.100	<0.100	<0.100	0.121	<0.100
24413	GP8 003 10	<0.100	<0.100	<0.100	<0.100	<0.100
24414	GP8 004 13	<0.100	<0.100	<0.100	<0.100	<0.100
24415	GP8 005 16	<0.100	0.107	<0.100	0.270	0.123
24416	GP8 006 19	<0.100	<0.100	1.04	2.01	<0.100
24417	GP9 001 4	<0.100	<0.100	<0.100	<0.100	<0.100
24418	GP9 002 7	<0.100	<0.100	9.69	15.1	7.13
24419	GP9 003 10	<0.100	<0.100	4.43	9.11	3.74
24420	GP9 004 13	<0.100	<0.100	11.8	22.7	3.99
24421	GP9 005 16	1.61	<0.100	11.2	20.9	<0.100
24422	GP9 006 19	<0.100	<0.100	9.11	20.8	<0.100
	% IA % EA	100 97	96 94	97 97	100 100	91 92
	BLANK	<0.100	<0.100	<0.100	<0.100	<0.100

METHODS: SW 846-8021B,5030

Raland K Tuttle

4-5-00

Date



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX; 505-392-3760

SampleType: Soil

Sample Condition: Intact/ Iced

Project #: EOT 1025C Project Name: TNM 97-18

Project Location: Monument, N.M.

Sampling Date: 03/28/00 Receiving Date: 03/29/00

Analysis Date: 4/02/00

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg	
24423	GP10 001 4	<0.100	<0.100	<0.100	<0.100	<0.100	
24424	GP10 002 7	<0.100	<0.100	<0.100	< 0.100	<0.100	
24425	GP10 003 10	<0.100	0.190	<0.100	0.214	<0.100	
24426	GP10 004 13	<0.100	<0.100	<0.100	<0.100	<0.100	
24427	GP10 005 16	<0.100	<0.100	<0.100	<0.100	<0.100	

% IA	95	96	100	106	97
% EA	94	98	99	105	96
BLANK	<0.100	<0.100	<0.100	<0.100	< 0.100

METHODS: SW 846-8021B.5030

Paland K Turks

Raland K. Tuttle

4-5-00

Date



ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

Sample Type: Soil

Sample Condition: Intact/Iced

Project #: EOT1025C Project Name: TNM 97-18

Project Location: Monument, N.M.

Sampling Date: 03/28/00

Receiving Date: 03/29/00 Analysis Date: 03/30/00

**GRO** DRO

		C6-C10 >	C10-C28	
ELT#	FIELD CODE	mg/kg	mg/kg	 
24393	GP4 001 4	<10	<10	
24394	GP4 002 7	<10	64	
24395	GP4 003 10	98	3940	
24396	GP4 004 13	407	1287	
24397	GP4 005 16	1399	4304	
24398	GP4 006 19	1357	3763	
24399	GP4 007 22	105	63	
24400	GP5 001 4	<10	153	
24401	GP5 002 7	<10	112	
24402	GP5 003 10	174	5536	
24403	GP5 004 13	959	3660	
24404	GP5 005 16	770	2690	
24405	GP5 006 19	3130	7782	
24406	GP5 007 22	181	804	
24407	GP7 001 4	<10	304	
24408	GP7 002 7	<10	2324	
24409	GP7 003 10	<10	261	
24410	GP7 004 13	<10	128	
24411	GP8 001 4	<10	53	
	% INSTRUMENT ACCURACY	99	114	
	% EXTRACTION ACCURACY	99	113	
	BLANK	<10	<10	

Methods: EPA SW 846-8015M GRO/DRO



"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.

ATTN: MR. JESSE TAYLOR

P.O. BOX 4845

MIDLAND, TEXAS 79704

FAX: 915-520-4310 FAX: 505-392-3760

Sample Type: Soil

Sample Condition: Intact/Iced

Project #: EOT1025C Project Name: TNM 97-18

Project Location: Monument, N.M.

Sampling Date: 03/28/00 Receiving Date: 03/29/00

Analysis Date: 03/30/00

GRO	DRO
C6-C10	>C10-C28

		ai io	D110
		C6-C10	>C10-C28
ELT#	FIELD CODE	mg/kg	mg/kg
24412	GP8 002 7	<10	492
24413	GP8 003 10	11	3624
24414	GP8 004 13	<10	115
24415	GP8 005 16	<10	81
24416	GP8 006 19	113	1099
24417	GP9 001 4	<10	4322
24418	GP9 002 7	655	1888
24419	GP9 003 10	756	2664
24420	GP9 004 13	2482	6660
24421	GP9 005 16	476	929
24422	GP9 006 19	2364	5114
24423	GP10 001 4	<10	241
24424	GP10 002 7	<10	121
24425	GP10 003 10	<10	33
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# ATTACHMENT C

# New Mexico Office of the State Engineer Well Reports and Downloads

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# PURPOSE OF USE CODES

Use Code	Description
AGR	AGRICULTURE OTHER THAN IRRIGATION
BPW	BRINE PRODUCTION WELL
COM	COMMERCIAL
CON	CONSTRUCTION
CPS	CATHODIC PROTECTION WELL
DAI	DAIRY OPERATION
DEW	DEWATERING WELL
DOM	72-12-1 DOMESTIC ONE HOUSEHOLD
EXP	EXPLORATION
FGP	FISH AND GAME PROPOGATION
FPO	FEED PEN OPERATION
HWY	HIGHWAY CONSTRUCTION
IND	INDUSTRIAL
INJ	INJECTION
IRR	IRRIGATION
MDW MFG	COMMUNITY TYPE USE - MDWCA, PRIVATE OR COMMERCIAL SUPPLIED MANUFACTURING
MFG MIL	MANUFACTURING MILITARY - MILITARY INSTALLATIONS
MIN	MINING OR MILLING OR OIL
MOB	MOBILE HOME PARKS
MON	MONITORING WELL
MPP	MEAT PACKING PLANT
MUL	72-12-1 MULTIPLE DOMESTIC HOUSEHOLDS
MUN	MUNICIPAL - CITY OR COUNTY SUPPLIED WATER
NON	NON-PROFIT ORGANIZATIONAL USE
NOT	NO USE OF RIGHT OR POD
NRT	NO RIGHT
OBS	OBSERVATION
OFM	OIL FIELD MAINTENANCE
OIL	OIL PRODUCTION
POU	POULTRY AND EGG OPERATION
PPP	PETROLEUM PROCESSING PLANT
PRO	72-12-1 PROSPECTING OR DEVELOPMENT OF NATURAL RESOURCE
PUB	2-12-1 CONSTRUCTION OF PUBLIC WORKS
REC	RECREATION
SAN	72-12-1 SANITARY IN CONJUNCTION WITH A COMMERCIAL USE
SCH	SCHOOL USE - PUBLIC, PRIVATE, PAROCHIAL, & UNIVERSITIES
SRO	SECONDARY RECOVERY OF OIL
STK	72-12-1 LIVESTOCK WATERING
STO	STORAGE
SUB	SUBDIVISION
UTL	PUBLIC UTILITY



# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

### OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

April 20, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: 5051-2986

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13)

TNM-97-18 SITE

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13), TNM-97-18 SITE". This document contains EOTT's Stage 1 work plan proposal for investigation of the extent of soil and ground water contamination related to a crude oil spill at EOTT's TNM-97-18 site located in Section 28, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico.

The OCD has identified the following deficiencies in the above referenced document and therefore the proposed Stage 1 Investigation plan is not administratively complete:

- 1. The document does not contain a plan to determine the extent of soil contamination at the site of the leak. Please provide such a plan.
- 2. The document does not contain a plan to inventory all water wells inside and within one mile from the perimeter of the site. Please provide such a plan.
- 3. The document proposes to install 1 additional monitoring well to determine the downgradient extent of ground water contamination. However, the document does not contain a plan to determine the lateral extent of the ground water contamination. Please provide such a plan.

The OCD requires that EOTT submit the above information to the OCD by May 19, 2000 with a copy provided to the OCD Hobbs District Office.

If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc:

Chris Williams, OCD Hobbs District Office

Jesse Taylor, Environmental Technology Group, Inc.

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660 5805 E. BUSINESS 20 MIDLAND, TEXAS 79702 (915) 682-3761

# FEDERAL EXPRESS AIR BILL # 8170 0342 3660

March 30, 2000

State of New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 87505 Attn: William Olson

# RE: ANNUAL GROUND WATER MONITORING REPORTS

Dear Mr. Olson:

Attached please find the 2000 Annual Groundwater Monitoring Reports for the following sites:

Monument #18 Monument #10

Monument #17 TNM-97-16 (Becky Jo Doom site)

Monument #2 HDO-90-23 Monument #15 SPS-11 TNM-97-17 TNM-98-02

TNM-97-18 TNM-98-S01 TNM-98-05A TNM-97-23

TNM-96-16 TNM-95-10 (Saunders) TNM-97-14 TNM-97-04 (Townsend)

I hope all meets with OCD requirements for closure of the site but if you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,

**Lennah Frost** 

Sr. Environmental Engineer

cc: Environmental File

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660 5805 E. BUSINESS 20 MIDLAND, TEXAS 79702 (915) 682-3761

January 5, 2000

State of New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 87505 Attn: William Olson RECEIVED

JAN 1 2 2000

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

RE:

STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13)

**TNM-97-18 SITE** 

Dear Mr. Olson:

As per your letter dated December 22, 1999, attached please find EOTT's additional Subsurface Investigation Report and Stage 1 Abatement Plan for the above captioned leaksite. This information should meet and/or exceed the requirements set out in your letter.

I hope all meets with OCD approval but if you have any questions, please don't hesitate to call.

Sincerely,

Lennah Frost

Sr. Environmental Engineer

/attachments

cc:

NMOCD - Hobbs



# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

# OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

December 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-745

Ms. Lennah Frost EOTT Energy Pipeline Limited Partnership P.O. Box 1660 Midland, Texas 79702

RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13)

**TNM-97-18 SITE** 

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) October 4, 1999 "ADDITIONAL DATA REQUIRED TO COMPLETE STAGE 1 ABATEMENT PLANS FOR THE FOLLOWING SITES: SPS-11 LEA COUNTY, NEW MEXICO; TNM-98-05A LEA COUNTY, NEW MEXICO; TNM-97-14 LEA COUNTY, NEW MEXICO; TNM-97-16 LEA COUNTY, NEW MEXICO; TNM-97-17 LEA COUNTY, NEW MEXICO; TNM-97-18 LEA COUNTY, NEW MEXICO". This document, which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc., contains EOTT's work plans for installation of additional monitor wells at a number of EOTT crude oil pipeline spill sites

The above referenced work plan for the TNM-97-18 is not administratively complete since this document conflicts with the EOTT's prior August 30, 1999 proposed Stage 1 Plan Proposal and only contains partial information required under OCD Rule 19. The OCD requires that EOTT submit a single comprehensive Stage 1 Abatement Plan Proposal for the TNM-97-18 site pursuant to 19NMAC.15.A.19.E.3 which includes:

- a. Descriptions of the site, including a site map, and of site history including the nature of the release that caused the water pollution and a summary of previous investigations.
- b. A detailed site investigation work plan to define the site geology and hydrogeology, the vertical and horizontal extent and magnitude of vadose-zone and ground water contamination, the rate and direction of contaminant migration, and an inventory of water wells inside and within one mile from the perimeter of the site.

- c. A monitoring program, including sampling stations and frequencies, for the duration of the abatement plan.
- d. A quality assurance plan consistent with the sampling and analytical techniques listed in 20 NMAC.6.2.3017.B for all work to be conducted pursuant to the abatement plan.
- e. A schedule for all Stage 1 abatement plan activities, including the submission of a detailed final site investigation report to the OCD for approval.
- f. Any additional information necessary to design and perform an adequate site investigation.

The OCD requires that EOTT submit the above information to the OCD by January 27, 2000 with a copy provided to the OCD Hobbs District Office.

The OCD also requires that in the future EOTT submit separate work plans and reports for each site since some of the sites are being remediated under different rules and regulations

If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

Jesse Taylor, Environmental Technology Group, Inc.

# EOTT EVERGY Pipeline Limite Partnership

P.O. BOX 1660 5805 E. BUSINESS 20 MIDLAND, TEXAS 79702 (915) 682-3Z61 684 - 3400

October 15, 1999

State of New Mexico Oil Conservation Division - Hobbs District Office 1625 N. French Dr. Hobbs, NM 88240

Attn: Donna Williams

RECEIVED

OCT 2 5 1999

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

RE: Installation of Additional Monitor Wells in Lea County, NM

Dear Ms. Williams:

Below is a list of old Texas-New Mexico Pipeline sites that require additional monitor wells to be installed. Also on this list are 3 EOTT sites that require additional and/or new monitor wells.

TNM - SPS-11

TNM - 98-05A

TNM - 97-14

TNM - 97-16

TNM - 97-17

TNM - 97-18

EOTT - Darr Angell site #1 EOTT - Darr Angell site #2 EOTT - leak #TNM-LF-59

We will begin drilling these wells on Monday, October 25, 1999 and will proceed from site to site on a geographic basis. The SPS-11 site is scheduled first. I will be out of town that week but Wayne Brunette will be coordinating drilling activity with our contractor Jerry Nickell and Allan Eades of Eades Drilling. Wayne's number is 915/556-0190. If you would like to be present at any of these installations, please contact Wayne to verify time and locations for each day's drilling.

Donna, I hope this meets with your approval but if you have any questions or need additional information, please don't hesitate to call me.

Sincerely,

Lennah Frost

Sr. Environmental Engineer

William Olson - NMOCD - Santa Fe CC:

> Wavne Brunette Glenn Waldrop



# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

### OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

August 30, 1999

# <u>CERTIFIED MAIL</u> RETURN RECEIPT NO: Z-274-520-703

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
5805 E. Business 20
Midland, Texas 79702

RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-13)

TNM-97-18 SITE

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) July 12, 1999 "TNM-97-18 GROUNDWATER ABATEMENT PLAN (AP-13)". This document contains EOTT's proposed Stage 1 abatement plan for soil and ground water contaminated as a result of a crude oil pipeline release at the TNM-97-18 site.

The above referenced document is deficient because it does not contain:

- 1. A plan for investigation of the extent and magnitude of ground water contamination in excess of the abatement standards of OCD Rule 19.B.
- 2. A ground water monitoring plan.
- 3. A plan for monitoring progress and determining completion of the proposed insitu soil remediation.
- 4. A quality assurance/quality control plan for all soil and ground water quality sampling activities.
- 5. The composition or chemical constituents of the materials proposed to be injected to promote insitu bioremediation of soils. It is also not clear whether EOTT proposes to inject these materials into the ground water.

6. The intended use of the work plan. In a recent conversation, you indicated that EOTT intends that the above submittal be both a Stage 1 Investigation Plan and a Stage 2 Remediation Plan. Please clarify the intent of the currently submmitted plan. If this plan is both a Stage 1 and a Stage 2 work plan, the plan does not contain a plan for remediation of contaminated ground water.

The OCD requires that EOTT submit the above information to the OCD by September 30, 1999 with a copy provided to the OCD Hobbs District Office.

If you have any questions or comments, please contact me at (505) 827-7154.

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office

# EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660 5805 E. BUSINESS 20 MIDLAND, TEXAS 79702 (915) 687-2040

# **BY CERTIFIED MAIL**

May 21, 1999

State of New Mexico Oil Conservation Division 2040 S. Pacheco Santa Fe, NM 87505 Attn: William Olson

RE: TNM-97-18 GROUNDWATER ABATEMENT PLAN (AP-13)

Dear Mr. Olson:

EOTT requests permission to install one additional monitor well at the above captioned location prior to submitting an abatement plan. The well be installed at the source of the leak to determine exact hydrocarbon impact on groundwater at this location and to aid in putting together a feasible abatement plan.

We would like to begin installation of the well as soon as approval is received from the NMOCD. Your prompt attention to this matter will be appreciated. If you have any questions or need additional information, please don't hesitate to call me at 915/684-3467.

Sincerely,

Lennah Frost

Sr. Environmental Engineer

cc: Al Hugh - Environmental File



# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

# OIL CONSERVATION DIVISION

2040 S. PACHECO SANTA FE. NEW MEXICO 87505 (505) 827-7131

May 14, 1999

<u>CERTIFIED MAIL</u> RETURN RECEIPT NO: Z-274-520-657

Ms. Lennah Frost EOTT Energy Pipeline Limited Partnership P.O. Box 1660 Midland, Texas 79702

RE: TNM-97-18 GROUND WATER ABATEMENT PLAN (AP-13)

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) understands that the EOTT Energy Pipeline Limited Partnership (EOTT) is the current operator of the above referenced pipeline site which was previously operated by the Texas-New Mexico Pipe Line Company (TNMPLC). The OCD has reviewed TNMPLC's March 10, 1999 "SUBSURFACE INVESTIGATION REPORT, TNM-97-18, UNIT B, SECTION 28, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, KEI JOB NO. 810052-1" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains the results of TNMPLC's installation of a soil boring and ground water monitoring wells at the TNM-97-18 crude oil pipeline spill site.

A review of the above referenced report shows that ground water at the site is contaminated with free phase hydrocarbons as a result of the crude oil spill. Pursuant to 19 NMAC 15.A.19.C.1, the OCD requires an abatement plan for the TNM-97-18 site to abate ground water pollution. To initiate the abatement plan process, the OCD requires that EOTT submit to the OCD by July 19, 1999 a Stage 1 Investigation Proposal pursuant to OCD Rule 19.E.1. and 19.E.3. The Stage 1 Investigation Proposal shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The Stage 1 Abatement Plan Proposal shall include proof of written notice pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) will be provided after EOTT submits a written notification proposal.

If you have any questions, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely.

Roger C. Anderson

**Environmental Bureau Chief** 

xc: Chris Williams, OCD Hobbs District Office

Monica Slentz, KEI

US Postal Service

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Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered
Return Receipt Showing to Whom, Date, & Address TOTAL Postage & Fees Postmark or Date PS Form **3800**, April 1995

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5309 Wurzbach, Suite 100 San Antonio, Texas 78238 (210) 680-3767 (210) 680-3763 FAX

March 10, 1999

Mr. Tony Savoie
TEXAS - NEW MEXICO PIPE LINE COMPANY
P.O. Box 1030
Jal, New Mexico 88252

RECEIVED

MAR 1 5 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Subsurface Investigation Report

TNM-97-18

Unit B, Section 28, Township 20 South, Range 37 East

Lea County, New Mexico KEI Job No. 810052-1

Dear Mr. Savoie:

Transmitted with this letter is the Subsurface Investigation Report for the installation of 3 monitoring wells (designated MW-1 through MW-3) and 1 soil boring at the referenced site. Please review the report and contact me or Theresa Nix at (210) 680-3767 if you have any questions.

Respectfully,

Monica Slentz

Project Manager

**Enclosure** 

CC:

Marc Oler; Equilon

Bill Olson, OCD Santa Fe,

in Sless

**OCD Hobbs** 

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5309 Wurzbach, Suite 100 San Antonio, Texas 78238 (210) 680-3767 (210) 680-3763 FAX

November 5, 1998

Mr. Roger Anderson STATE OF NEW MEXICO Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Texas-New Mexico Pipe Line Company
Pipe Line Release Site No. TNM-97-18
Unit B, Section 28, Township 20 South, Range 37 East
Lea County, New Mexico
Job No. 810052-1

Dear Mr. Anderson:

This letter provides written notification of the discovery of Phase-Separate Hydrocarbon (PSH) on ground water at the above referenced site during soil remediation activities.

On November 3, 1998, PSH on ground water was observed during soil boring installation in hydrocarbon-impacted soil at the referenced site, which is located in the NW/4, NE/4 Section 28, Township 20 South, Range 37 East in Lea County, New Mexico. I notified William Olson at your office by phone on November 3, 1998, of this discovery.

TNMPL has installed 3 monitoring wells at the site to further characterize the nature and extent of hydrocarbon impact to ground water. A report summarizing this additional work will be provided to OCD upon its completion. TNMPL expects to reach closure at this site within one year.

If you have any questions please contact me at (210) 680-3767.

Respectfully,

Theresa Nix
Project Manager

cc: Tony Savoie, Equilon

heresa Nix

**OCD Hobbs District Office** 



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



# MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal	Time /520	)	Date 11/3/98
Originating Party			Other Parties
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(210) 680 - 3767 Subject			(pice mail)
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