

AP-001



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2014 NOV 25 P 3: 15

November 19, 2014

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

Subject: Request to Modify Sampling at the Former Brickland Refinery, Sunland Park, New Mexico

Dear Mr. Von Gonten:

Huntsman requests your approval to modify the sampling performed at the former Brickland Refinery site located in Sunland Park, New Mexico. As we discussed in our meeting on September 30, 2014, this request is in accordance with Title 19 Chapter 15 Part 30 (19.15.30.9 New Mexico Administrative Code [NMAC] Abatement Standards and Requirements) and the criteria of the approved Stage 2 Abatement Plan.

Proposed Sampling Modification

Following your guidance during our meeting, we request your approval to modify the sampling performed at the site as follows:

- Cease sampling of and plug Monitoring Wells MW-4, MW-7, MW-14, and MW-15;
- Cease analysis for polyaromatic hydrocarbons (PAH) for all monitoring wells except MW-8;
- Cease analysis for lead;
- Cease sampling of the Rio Grande River;
- Perform analyses for benzene only for Monitoring Wells MW-3S, MW-3D, MW-5, MW-6S, MW-6D, MW-8, MW-9S, MW-10, MW-11, and MW-17; and
- Remove remaining well points.

The attached figure (Attachment A) shows the locations of the referenced monitoring wells and river samples.

Rationale for Modification Request

The proposed modification meets the requirements of 19.15.30.9 NMAC and the criteria of the approved Stage 2 Abatement Plan. Our proposal is to discontinue sampling of monitoring wells and river samples that have met the abatement standards in Subsections A, B, and C of 19.15.30.9 NMAC for eight consecutive sampling events.

The attached graphs (Attachment B) show the detected concentrations of compounds as compared to the New Mexico Water Quality Control Commission (NMWQCC) standard. No exceedances of NMWQCC standards have been observed in Monitoring Well MW-7 since 2003. No exceedances of NMWQCC standards have been observed in Monitoring Wells MW-4, MW-14, and MW-15 since 2004. With the exception of MW-8, no exceedances of the NMWQCC PAH standard have been observed in any of monitoring wells or river water samples since 2000. No exceedances of the NMWQCC lead standard have been observed in any of monitoring wells or river water samples since 2005.

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We appreciate your consideration of this request to modify the sampling performed at the former Brickland Refinery site. If you have any questions or require additional information, please contact me at 281-719-3039 or via email at ed_l_gunderson@huntsman.com.

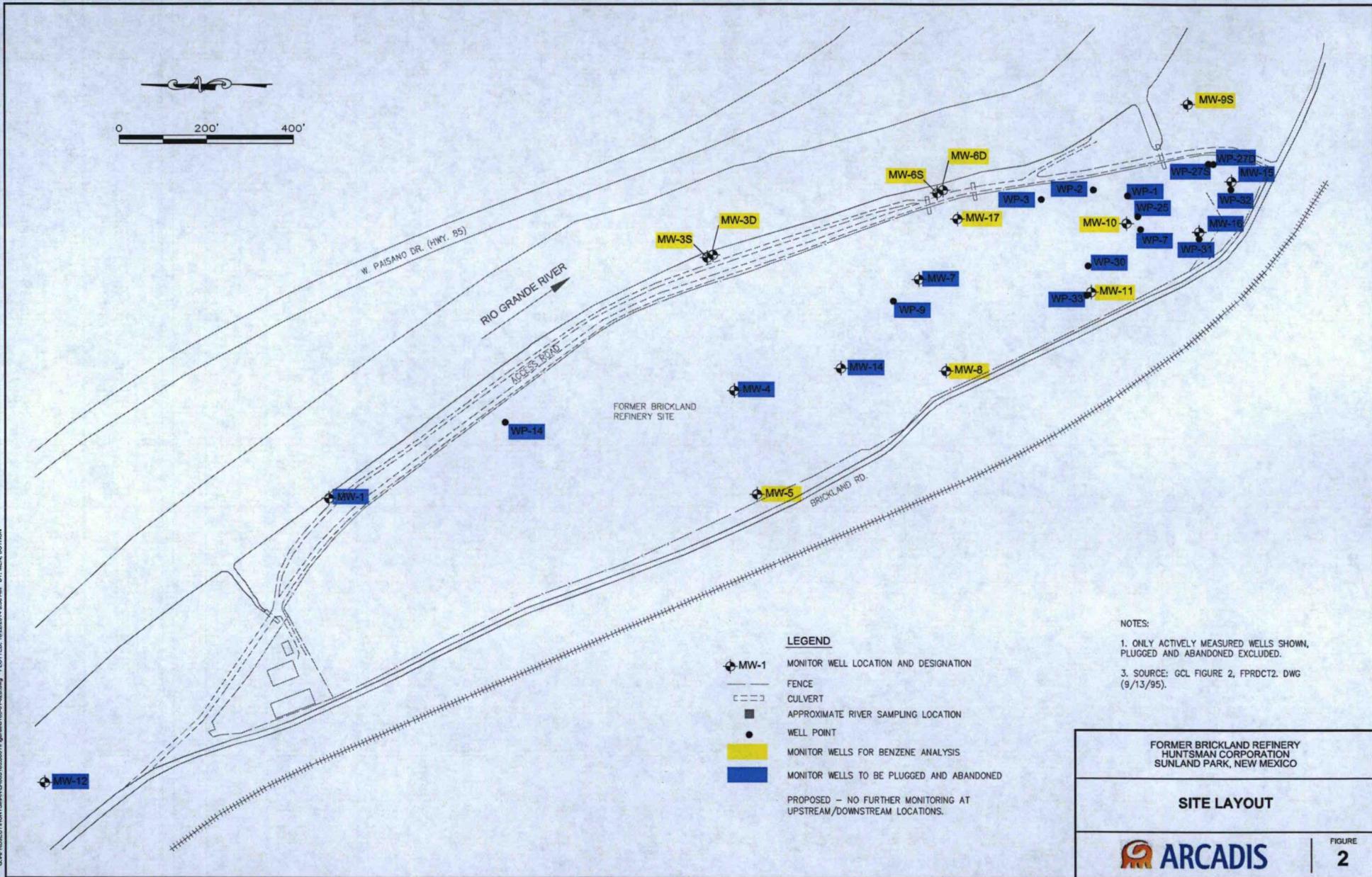
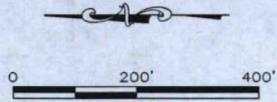
Sincerely,

A handwritten signature in black ink that reads "Edward L. Gunderson". The signature is written in a cursive style with a horizontal line at the end.

Ed Gunderson
Senior Manager, EHS Legal and Regulatory Compliance

Attachments:
Well Location Figure
Analyte Concentration Graphs

Attachment A
Well Location Figure



LEGEND

- MW-1 MONITOR WELL LOCATION AND DESIGNATION
 - FENCE
 - CULVERT
 - APPROXIMATE RIVER SAMPLING LOCATION
 - WELL POINT
 - MONITOR WELLS FOR BENZENE ANALYSIS
 - MONITOR WELLS TO BE PLUGGED AND ABANDONED
- PROPOSED - NO FURTHER MONITORING AT UPSTREAM/DOWNSTREAM LOCATIONS.

NOTES:

1. ONLY ACTIVELY MEASURED WELLS SHOWN, PLUGGED AND ABANDONED EXCLUDED.
3. SOURCE: GCL FIGURE 2, FPRDCT2. DWG (9/13/95).

FORMER BRICKLAND REFINERY
HUNTSMAN CORPORATION
SUNLAND PARK, NEW MEXICO

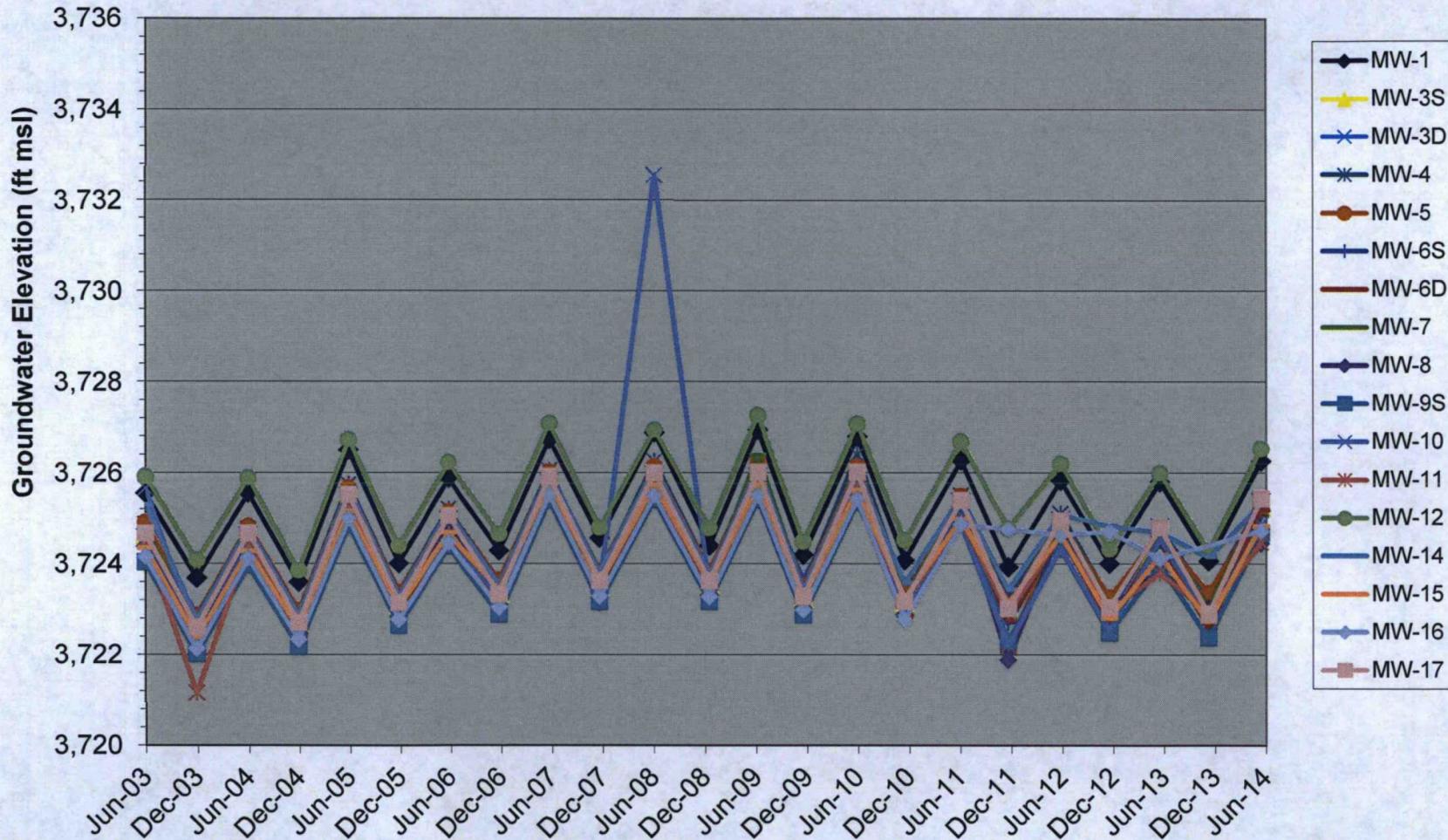
SITE LAYOUT



DRAWN BY: S. MEN, CHECKED BY: TOR, PROJECT MANAGER: DRE, G:\PROJECTS\HUNTSMAN\LA0316\0011\gms\dwg\11504105.dwg, PLOTTED: 10/25/2014 1:50 AM, BY: MEN, D010104

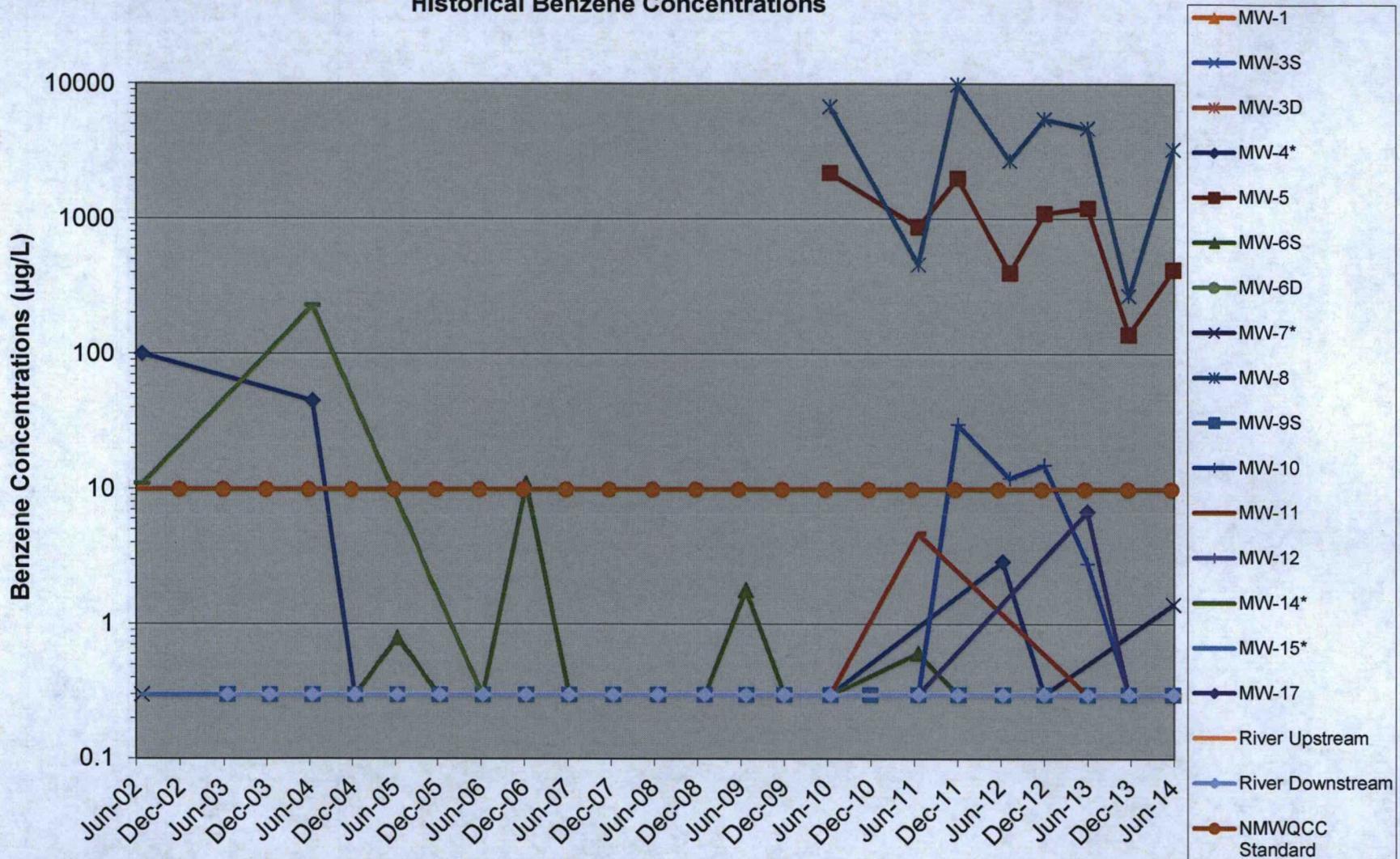
Attachment B
Analyte Concentration Graphs

Historical Water Level Elevations



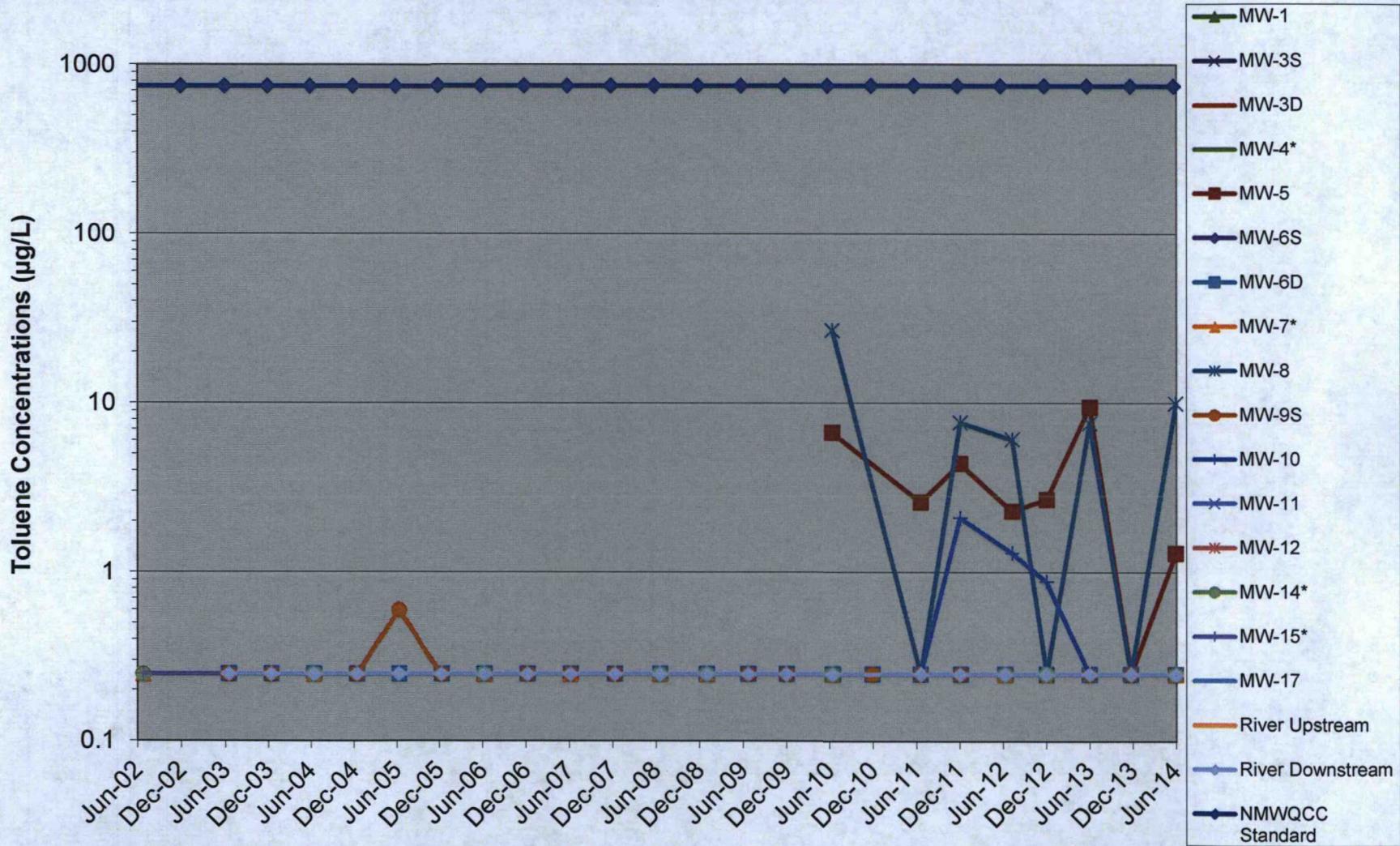
Note: MW-16 was not measured in December 2013 due to roots on probe.
 ft msl = Feet per mean sea level.

Historical Benzene Concentrations



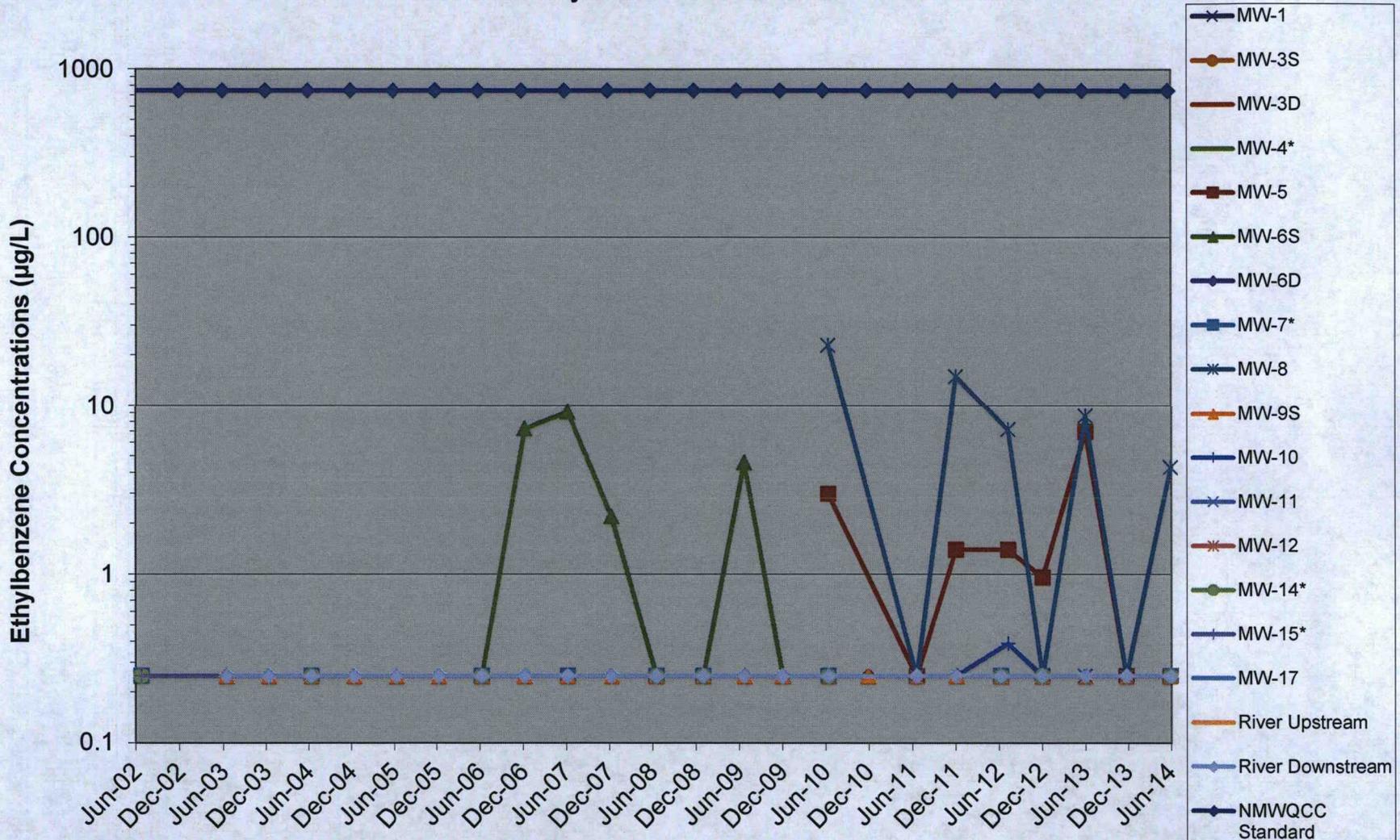
Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for benzene concentrations is 10 micrograms per liter (µg/L). For consistency, all non-detect values are graphed at 0.3 µg/L (1/2 the 2014 reporting limit). * = Wells that are only sampled biennially.

Historical Toluene Concentrations



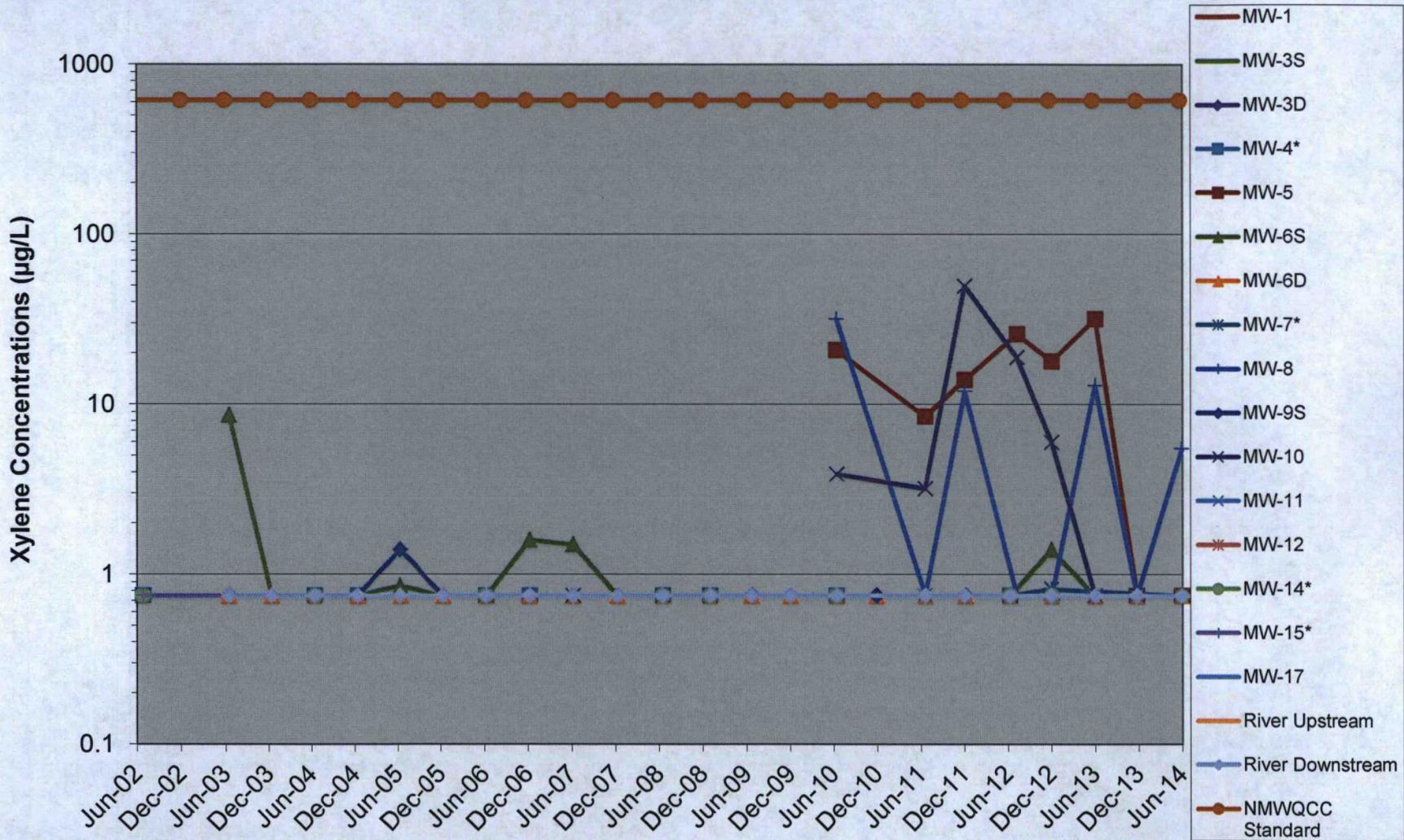
Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for toluene concentrations is 750 micrograms per liter (µg/L). For consistency, all non-detect values are graphed at 0.25 µg/L (1/2 the 2014 reporting limit). * = Wells that are only sampled biennially.

Historical Ethylbenzene Concentrations



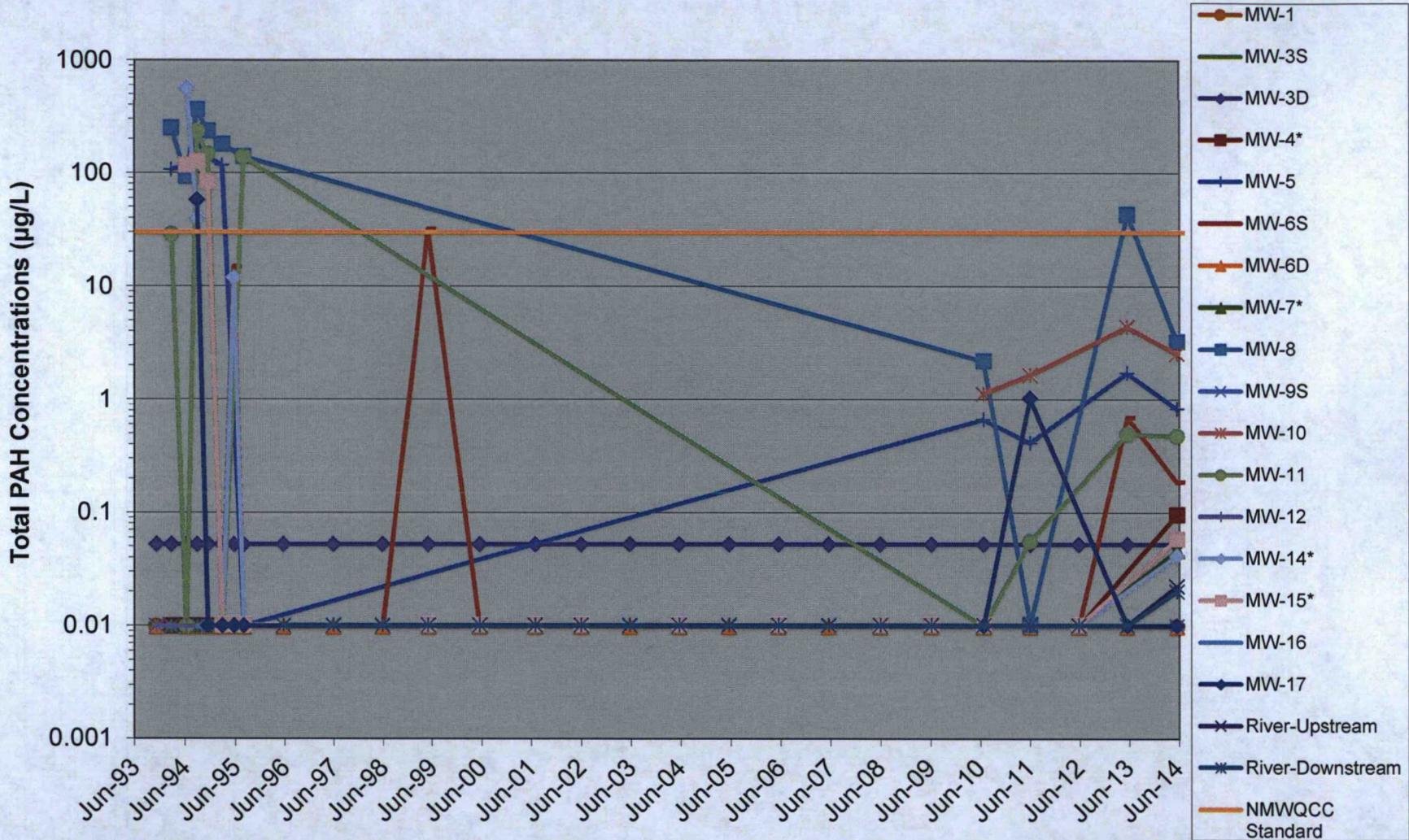
Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for ethylbenzene concentrations is 750 micrograms per liter (µg/L). For consistency, all non-detect values are graphed at 0.25 µg/L (1/2 the 2014 reporting limit). * = Wells that are only sampled biennially.

Historical Xylene Concentrations



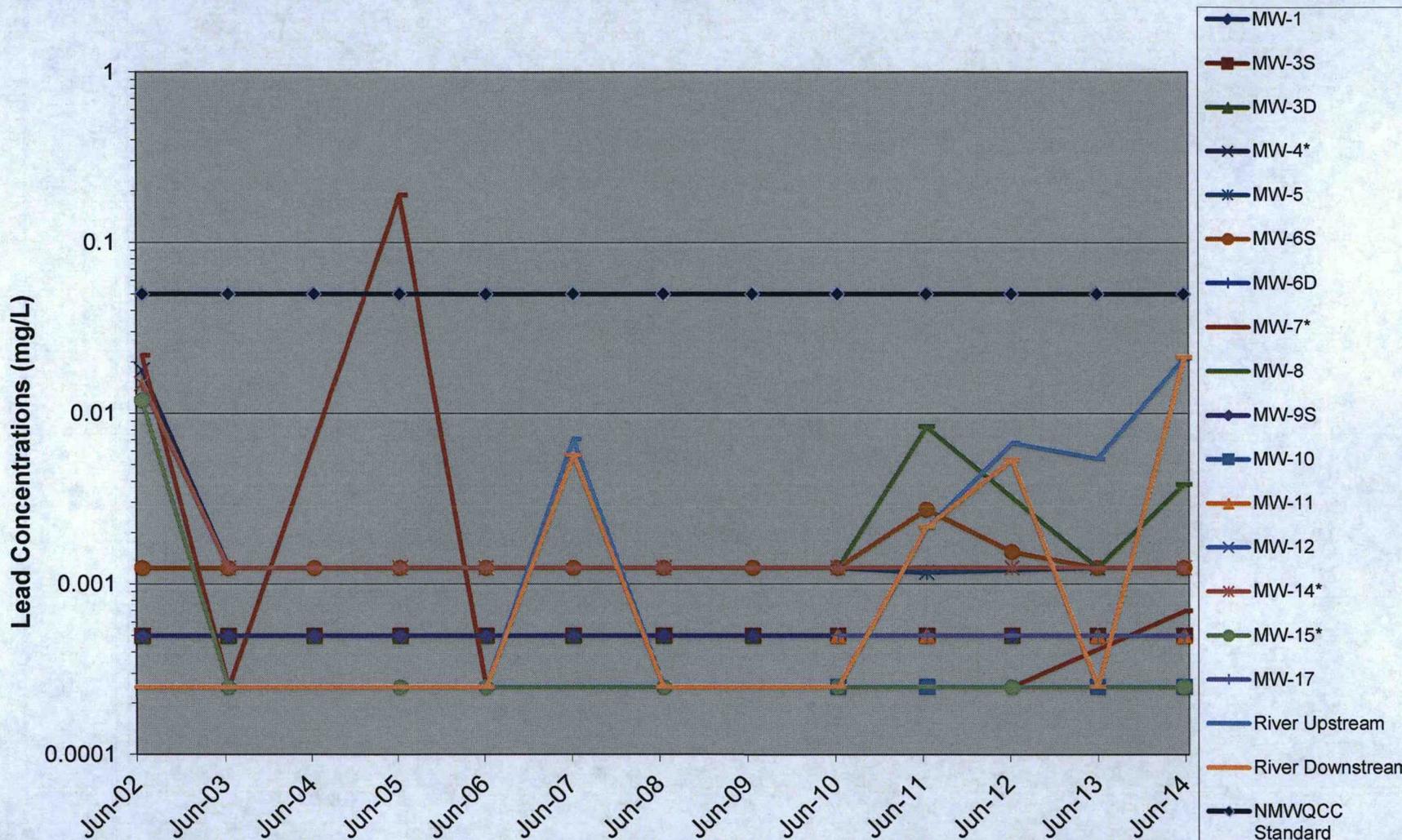
Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for xylene concentrations is 620 micrograms per liter (µg/L). For consistency, all non-detect values are graphed at 0.75 µg/L (1/2 the 2014 reporting limit). * = Wells that are only sampled biennially.

Historical Total PAH Concentrations



Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for PAH concentrations is 30 micrograms per liter (µg/L). For consistency, all non-detect values are graphed at 0.01 µg/L and 0.05 µg/L (1/2 the 2014 reporting limits). * = Wells that are only sampled biennially.

Historical Lead Concentrations



Note: The highest detection between the parent and duplicate samples was used. The New Mexico Water Quality Control Commission (NMWQCC) standard for lead concentrations is 0.05 milligrams per liter (mg/L). For consistency, all non-detect values are graphed at 0.00025 mg/L, 0.0005, mg/L and 0.00125 mg/L (1/2 the 2014 reporting limits). * = Wells that are only sampled biennially.