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Fax: (432) 686-0186

Reference No. 049296

May 22, 2007

Mr. Larry Johnson Environmental Engineer New Mexico Oil Conservation Division 1625 N. French Drive Hobbs, New Mexico 88240

Re: Soil Remediation Workplan Centurion Pipeline L.P. May 18, 2007 Gladiola Station Crude Oil Release Section 5, Township 12 South, Range 38 East Lea County, New Mexico

Dear Mr. Johnson:

Conestoga-Rovers and Associates (CRA) is pleased to present this Soil Remediation Workplan on behalf of Centurion Pipeline L.P. (Centurion) for the above referenced crude oil release site.

The Gladiola Station release site is located 3-miles north of Highway 380 on Copeland Road approximately 12-miles east of Tatum, Lea County, New Mexico (FIGURE 1). The legal description of the Site is the Section 5, Township 12 South, Range 33 East with GPS coordinates 33° 18′ 3.47″ N and 103° 6′ 39.07″ W. CRA understands the surface property is owned by the 07 Ranch Land Limited Partnership and the State of New Mexico.

A crude oil release of approximately 15-barrels occurred on May 18, 2007. The release was the result of a sump overflow. A strainer valve was left partially open wich allowed the release of approximately 17-barrells of crude oil. Centurion was able to recover approximately 15-barrells of crude with a vac truck that day. Excavation activities began on May 18, 2007 in an effort to minimize the vertical migration of the crude oil. Centurion notified Mr. Tommy Burrus of the 07 Ranch Land Limited Partnership of the release on May 18, 2007. A copy of the submitted OCD form C-141, Release Notification and Corrective Action is included as an enclosure to this correspondence.

The OCD has regulatory jurisdiction over oil and gas production operations including pipeline spill/closure in the State of New Mexico. This project will be conducted under the regulatory jurisdiction of the OCD, which requires that soil impacted by a crude oil spill be remediated in such a manner that the potential for future affects to groundwater or the environment are minimized. The OCD hydrocarbon remediation levels are determined by ranking criteria on a site-by-site basis, which is outlined in the OCD *Guidelines for Remediation of Spills, Leaks, and Releases,* dated August 13, 1993. The ranking criteria are



May 22, 2007

2

based on three site characteristics: depth to groundwater, wellhead protection and distance to surface water.

Information obtained by CRA indicates that the depth-to-groundwater in the vicinity of the Site is approximately 30-feet. Based on these Site characteristics and associated OCD ranking criteria presented in the table below, the following hydrocarbon remediation levels apply at the Site: benzene- 10 ppm, Total BTEX- 50 ppm and TPH- 100 ppm.

CHARACTERISTIC	SELECTION	SCORE	
Depth to Groundwater	> 100 feet	20	
Wellhead Protection Area	>1,000 feet	0	
Distance to Surface Water	>1,000 feet	0	

## Total Ranking Score = >19

Hydrocarbon-impacted soils associated with the crude oil release will be excavated and delineated using a trackhoe and backhoe. The vertical and horizontal extents of the excavation will be assessed by field personnel using OCD procedures for headspace analysis of soil samples. Confirmation soil samples will be collected for determination of the final soil contaminant concentrations pursuant to section VI.A of the OCD *Guidelines for Remediation of Spills, Leaks, and Releases*, dated August 13, 1993.

Soil samples collected at the site will placed into a laboratory-supplied soil jar equipped with a Teflonlined lid and placed on ice in an insulated cooler. These samples will be submitted to TraceAnalysis, Inc. (Trace) in Lubbock, Texas for analysis of total petroleum hydrocarbons (TPH) diesel-range organics (DRO) and gasoline-range organics (GRO) by EPA Method 8015 modified and analysis of benzene, toluene, ethylbenzene and xylene (BTEX) by EPA Method 8021B. The submitted coolers will be sealed for shipment and proper chain-of-custody documentation will accompany the samples to the laboratory.

Soils exhibiting concentrations above hydrocarbon remediation levels will be brought to the ground surface (to the practical extent possible) and staged onsite. Pending approval from J&L Landfarm, Inc. (J&L) and authorization from the OCD, excavated soils will be hauled to J&L for final management.

Backfill material for the onsite excavations will be purchased from the landowner. Imported caliche will be used along the county road. A geosynthetic liner will be installed while backfilling any excavation located within 30-feet of the sump at a depth of approximately 2-feet below ground surface (bgs). All excavations will be backfilled to the current grade of the surrounding land surface.



May 22, 2007

3

Reference No. 049296

Please note that Centurion and CRA are currently active in the remedial actions associated with this location. If you have any questions or comments with regards to this Soil Remediation Workplan please call do not hesitate to contact our Midland office at (432) 686-0086. Your timely response to this correspondence is appreciated.

Yours truly, CONESTOGA-ROVERS & ASSOCIATES

~11S

Aaron M. Hale Project Geologist

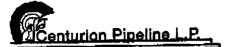
Thomas Clayon

Thomas C. Larson Operations Manager

Enclosures: Site Location Map Site Details Map Form C-141

c.c.: Darrel Lester, Centurion Pipeline L.P., Midland, Texas CRA – Midland File

4326861425



2200 East County Road 90, Nt ( and, Texas 79708 Phone 432.686.1482 Fax 432.7 6.1425



May 21, 2007

Mr. Larry Johnson Environmental Engineer New Mexico Oil Conservation Division 1625 North French Hobbs, New Mexico 88240

Subject: C141 submittal Centurion LMEP # 308-07-025

Re: Centurion Pipeline, LP Gladiola Station Sec 5, T-12-S, R-38-E Lea County, New Mexico

Dear Mr. Johnson:

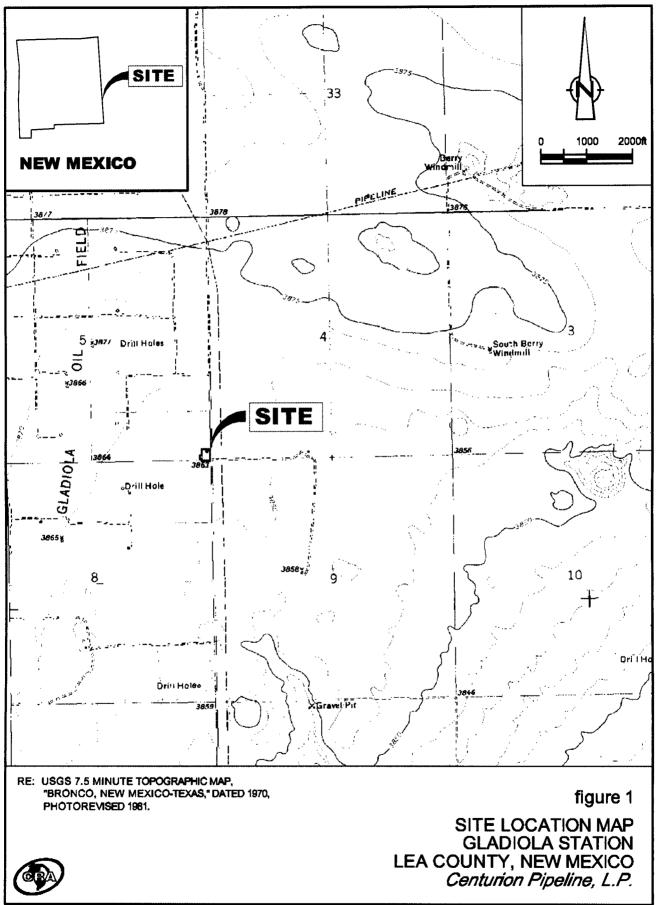
Centurion Pipeline, L.P. (Centurion) submits this attached initial C-141 for the above referenced leak site located on land owned by Mr. Burris.

In accordance with NMOCD Rule 116, corrective actions for the release will be addressed in accordance with a remediation plan and submitted to your office.

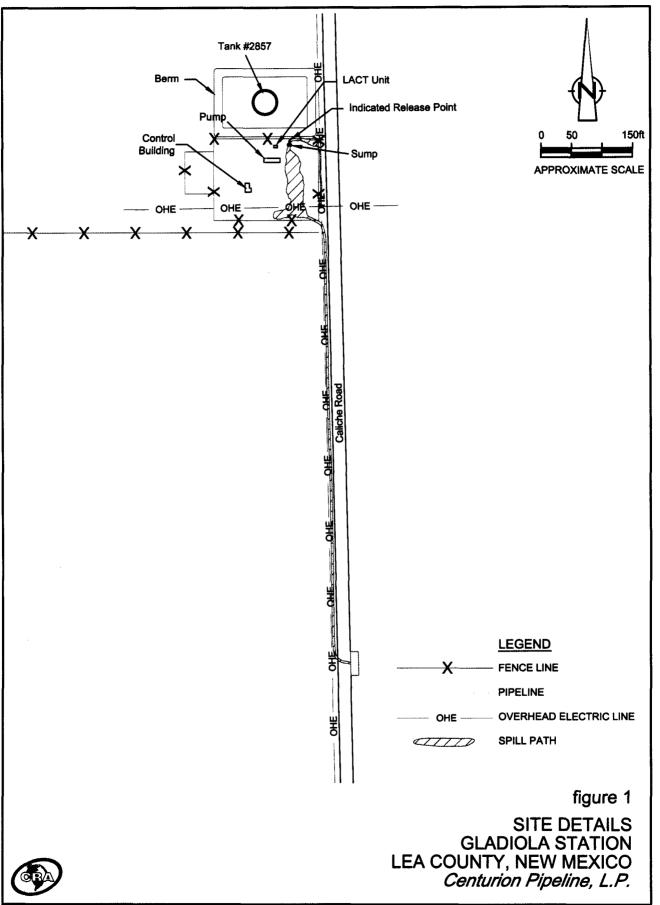
If you have any questions or need additional information, please call me at (432) 686-1479.

Sincerely, Centurion Pipeline, LP

Darrer O. Lester HES/Regulatory Compliance Lesder



049296-00(OCD001)GN-BR002 MAY 22/2007



049296-00(OCD001)GN-BR001 MAY 22/2007

Form C-141 Revised October 10, 2003

**Oil Conservation Division** 1220 South St. Francis Dr. Santa Fe, NM 87505

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

## **Release Notification and Corrective Action**

		OPERATOR	Initial Report	Final Report
Name of Company Centurion Pipeline, LP		Contact Darrel Lester		
Address 2200 East County Road 90 Midland, TX 79706		Telephone No. 432-686-1479		
Facility Name Gladiola Station		Facility Type Pipeline		
Surface Owner Mr. Burris	Mineral Own	er	Lease No.	

Surface Owner Mr. Burris

## LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	5	12-S	38-E					Lea

Latitude 33\*18'12" Longitude 103\*06'35"

**NATURE OF RELEASE** 

Type of Release Crude Oil	Volume of Release		olume Recovered 15 bbls.		
Source of Release Pipeline	Date and Hour of Oc 5/10/07		ate and Hour of Discovery 11/07 at 11:18 AM		
Was Immediate Notice Given?	es No Not Required If YES, To Whom? Larry Johnson (OCD – Hobbs Office) Left Message at 4:44 pm.				
By Whom? Darrel Lester	Date and Hour 05/11	1/07 at 4:44 pm			
Was a Watercourse Reached?	If YES, Volume Imp	If YES, Volume Impacting the Watercourse.			
If a Watercourse was Impacted, Describe Fully.*					
N/A			·		
Describe Cause of Problem and Remedial Action Taken.*					
Cause of the leak was due to a strainer valve failure which caused the sump to overfill. A high level alarm is being installed in an effort to prevent re- occurring failures. The leak was contained within the station property. Impacted soil will be delineated, excavated and/or blended on-site within regulatory guidance limits as outlined in the NMOCD Rule 116.					
Describe Area Affected and Cleanup Action Taken.*	······································	······································			
The leak area affected is apx. 800° x 1' West and 150° x 30° E. Average depth of the leak is 12 inches. The clean-up action included immediate response to stop the leak and containment of impacted soils. A third party environmental remediation company is in the process of <b>Adversity</b> and excavating the contaminated soil. The clean up crews worked through the weekend and will continue working until the site is clean and work 15 completed. Additional Information Requested: The size of the line = 2 inch ball valve line The average throughput of the line = 42 gallons per month H2S is not present at this "sweet" crude oil pipeline station site. Est. Age of pipeline = 22 years. I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, groce laws and/or regulations.					
Signature	OIL E Approved by District &		TION DIVISION		
FILLICU INALLIC. D.U. ECSICI					
Title: HES/Regulatory Compliance Leader	Approval Date: 5.2	507 Exp	biration Date: 7.25.07		
E-mail Address: Darrel_Lester@oxy.com	Conditions of Approval		Attached 🛛		
Date: 05/14/07 Phone: 432-686-1479	PLEAN UP DE	TINKE C- M			
	P( CLEAN UP DE	Colonen TATIC	N - AP# 1372		