

AP - 038

**GENERAL
CORRESPONDENCE**

YEAR(S):

2005 - 2006

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, May 16, 2006 4:37 PM
To: 'Hale, Aaron'
Cc: jonathan.k.hamilton@exxonmobil.com; Larson, Thomas
Subject: RE: AP038 Gladiola Station 5-16-06

OCD hereby approves of the revised stage 1 Abatement Plan.

Please be advised that NMOCD approval of this plan does not relieve the owner/operator of Responsibility should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Hale, Aaron [mailto:AHale@craworld.com]
Sent: Tuesday, May 16, 2006 4:07 PM
To: Price, Wayne, EMNRD
Cc: jonathan.k.hamilton@exxonmobil.com; Larson, Thomas
Subject: AP038 Gladiola Station 5-16-06

Wayne,

Thank you for calling me back today. I am seeking approval begin activities associated with the Revised Stage 1 Abatement Plan for Gladiola Station dated March 2, 2006. We have landowner access already and would like to drill the locations as depicted on FIGURE 5. This figure was revised per Glenn's comments in the January 24, 2006 NMOCD technical review. Per the Revised Stage 1 Abatement Plan, assessment/delineation activities include installation of 7 groundwater monitoring wells and 3 soil borings. Soil samples will be collected on 5-foot intervals with samples being submitted for laboratory analysis every 10-feet within the vadose zone. The soil samples will be analyzed for BTEX, TPH, and chlorides. Water from the monitoring wells will be collected and submitted for analysis of BTEX, PAHs, RCRA Metals, and groundwater quality parameters. A final Stage 1 Report will be submitted to the NMOCD no more than 45-days after completion of the assessment/delineation activities. If you have any questions, please feel free to call me. Thank you again for your help.

Aaron M. Hale, P.G.
Conestoga-Rovers & Associates, Inc.
2135 S. Loop 250 West
Midland, Texas 79703
(432) 686-0086 Fax: (432) 686-0186
<http://www.CRAworld.com>

An Equal Employment Opportunity Employer

NOBODY GETS HURT

5/17/2006



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 24, 2006

Mr. Jonathan Hamilton
ExxonMobil Refining and Supply Company
Global Remediation
2800 Decker Drive
MOB NW-46
Baytown, TX 77520

**RE: STAGE 1 ABATEMENT PLAN - GLADIOLA STATION
SECTION 5, TOWNSHIP 12 SOUTH, RANGE 38 EAST
LEA COUNTY, NEW MEXICO
AP038**

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has completed its technical review of the *Stage 1 Abatement Plan - Gladiola Station - Lea County, New Mexico* submitted on August 23, 2005, by Conestoga-Rovers & Associates on behalf of ExxonMobil Refining & Supply - Global Remediation (EMGR). On October 18, 2005, OCD determined that EMGR's proposed Stage 1 abatement plan was administratively complete and required EMGR to provide public notice of its Stage 1 work plan. On November 21, 2005, EMGR submitted documentation that public notice had been provided. No comments were received on this Stage 1 AP.

Based on its technical review, OCD has determined that the proposed Stage 1 work plan must be revised in order for EMGR to meet the requirements specified in OCD Rule 19.E.

1) EMGR's Stage 1 investigation work plan basically proposes the installation of 3 new soil borings and 4 new monitor wells and a limited ground water monitoring program. However, EMGR proposed work plan does not satisfactorily address the primary Stage 1 requirement of first defining the extent of both soil and ground water contamination and then remediating the site. Based on Figures 3, 4, and 5, and the analytical data, OCD has determined that the proposed number and location of soil borings will not allow EMGR to define the remaining soil contamination. EMGR notes in Section 3.1.1 that "*The horizontal extent of affected soils is not*

clearly identified." EMGR must remediate or remove all soil contamination in accordance with OCD Rule 19. EMGR must install a sufficient number of soil borings to delineate the soil contamination.

EMGR must first delineate and then abate ground water contamination in accordance with OCD Rule 19. OCD Rule 19.E (3) specifies that the investigatory work proposed in the stage 1 work plan must adequately define site conditions and to provide the data necessary to select and design an effective abatement option. Based on Figures 3, 4, and 5, and the analytical data, OCD has determined that the proposed new monitor well locations will not allow EMGR to define the extent of the ground water contamination.

EMGR did not provide any justification for its proposed locations. As OCD has previously discussed this issue with EMGR and its consultants, the proposed soil borings and monitor wells in EMGR's Stage 1 work plan do not appear to be located appropriately. The proposed locations of soil borings and monitor wells should be based on contour maps and cross sections using all available data. EMGR must revise its Stage 1 work plan by justifying its proposed number and locations for both the soil borings and the monitor wells, keeping in mind that it must abate both the soil and ground water contamination.

2) EMGR's Stage 1 work plan does not address the issue of abatement. EMGR must revise its work plan by proposing to install a sufficient number of soil boring locations that will allow it to define the remaining soil contamination and the extent of the ground water contamination. EMGR must also revise its work plan to address the issue of soil and ground water remediation. EMGR must specify what additional information it may need before it can propose a Stage 2 Abatement Plan.

3) EMGR must revise Sections 3.1.2 and 3.2.1 to specify that it will analyze soil samples at least every 10 feet.

4) EMGR must revise Section 3.2.2 to specify that it will screen the monitor wells in accordance with OCD's 1993 guidance; that is, 15 feet of screen total, with 5 feet of screen above the water table and 10 feet below of screen below.

5) EMGR must revise Section 3.2.3 and other sections throughout to delete the text that indicates that it will not sample wells that contain LNAPL or free-phase product. Given the frequency with which EMGR has detected LNAPL in its wells, not sampling those wells would not allow it to define the dissolved phase plume. EMGR should also revise Section 3.2.3 to be consistent with Section 4.2 and allow for the use of flow purging techniques.

6) EMGR must revise Section 3.2.4 to specify that it will also analyze for metals and general ground water quality parameters (general chemistry) using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

7) EMGR must add a new Section 3.4 in which it specifies that, pursuant to OCD Rule 19.E (3), it will submit quarterly progress reports and will submit a detailed final Stage 1 site investigation report containing the results of all site investigation activities to the OCD Santa Fe office by no later than 45 days after the implementation of the Stage 1 work plan with a copy provided to the OCD Hobbs District Office. The final Stage 1 site investigation report shall contain:

- a. A comprehensive description and summary of the results of all past and present soil and ground water investigation and monitoring activities.
- b. An inventory and map of water wells within one mile of the site.
- c. Geologic/lithologic logs and well construction diagrams for all site monitor wells.
- d. Geologic cross-sections of the site created using the geologic/lithologic logs from all site monitor wells and soil borings.
- e. Water table potentiometric contour maps showing the location of pipelines, excavations, spills, monitoring wells, recovery wells, and any other pertinent site features, as well as, the direction and magnitude of the hydraulic gradient.
- f. Isopleth maps for contaminants of concern.
- g. Summary tables of all past and present ground water quality monitoring results including copies of newly generated laboratory analytical data and associated QA/QC data.
- h. The disposition of all wastes generated.
- i. A Stage 2 abatement plan proposal meeting all of the requirements specified in OCD Rule 19.E (4).

8) EMGR must revise Section 4.1 by deleting the text that states that "*Fluid levels will be measured and recorded quarterly for a minimum of eight consecutive quarters.*" EMGR should propose appropriate modifications to its ground water monitoring program in its final Stage 1 site investigation report. However, OCD reminds EMGR that the purpose of the Stage 1 abatement plan is to delineate soil and ground water contamination, not to implement a long term monitoring program. EMGR will be required to remediate any soil and ground water contamination to appropriate standards.

9) As noted above in Comment 5, EMGR must revise Section 4.3 by deleting text that indicates that it will not sample monitor wells with LNAPL or free-phase product. Also, EMGR should also revise Section 4.0 to specify how it will handle purge water contaminated with LNAPL.

10) EMGR must revise the figures by labeling the locations of the new monitor wells and soil borings. Section 4.3.1 makes reference to MW-4, MW-5, MW-6, and MW-7, but Figure 5 is not appropriately labeled.

11) EMGR must revise Section 4.3.3 by adding metals and general chemistry to its ground water monitoring list (see Comment 6).

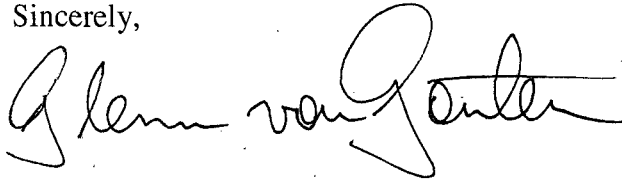
Mr. Jonathan Hamilton
January 24, 2006
Page 4

12) OCD will defer approval of a ground water monitoring program (see Section 5.0) until after EMGR submits its final Stage 1 site investigation report.

EMGR shall submit two paper copies and an electronic copy of its revised Stage 1 abatement plan to OCD's Santa Fe office by February 22, 2006 with a copy provided to the OCD Hobbs District Office. xxcd

If you have any questions, please contact me at 505-476-3488.

Sincerely,

A handwritten signature in cursive script that reads "Glenn von Gonten". The signature is written in black ink and is positioned above the printed name and title.

Glenn von Gonten
Senior Hydrologist

cc: Mr. Larry Johnson, OCD Hobbs District Office



**CONESTOGA-ROVERS
& ASSOCIATES**

Formerly BNC Environmental Services

2135 S. Loop 250 West

Midland, Texas 79703

Telephone: (432) 686-0086

<http://www.craworld.com>

Fax: (432) 686-0186

AP-038

November 29, 2005

Reference No. 041244

Various Interested Parties

**Subject: Written Notice
Stage 1 Abatement Plan - Gladiola Station
Section 5, T-12-S, R-38-E
Lea County, New Mexico**

Dear Interested Party:

Conestoga-Rovers and Associates (CRA) is submitting this Stage 1 Abatement Plan notice as required by OCD Rule 19.G.(1) on behalf of ExxonMobil Refining and Supply - Global Remediation (EMGR). The OCD Rule 19.G.(1) requires the issue of a written notice for the Stage 1 proposal to *"those persons, as identified by the Director, who have requested notification."* The enclosed Notice of Publication was submitted to the Hobbs News-Sun and the Santa Fe New Mexican and placed in the Legal Notice section of the newspapers on October 21, 2005 and October 24, 2005, respectively.

Additional questions should be directed to the New Mexico Oil Conservation Division at the address provided on the Notice of Publication.

Yours truly,
CONESTOGA-ROVERS & ASSOCIATES

Aaron M. Hale
Project Geologist

Encl. Notice of Publication

c.c.: Glenn von Gonten, OCD - Santa Fe, New Mexico
Jonathan Hamilton, EMGR - Baytown, Texas

RECEIVED
DEC 5 - 2005
OIL CONSERVATION
DIVISION

Equal
Employment Opportunity
Employer

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 Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Jonathan Hamilton, ExxonMobil Refining and Supply Company – Global Remediation (EMGR), Telephone (281) 834-4731, 2800 Decker Drive, MOB NW-46, Baytown, TX 77520, has submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination that was discovered following a release of approximately 15 barrels of crude oil on November 11, 2002, as a result of a sump overflow/bleeder valve leak at a crude oil pipeline pumping station known as the Gladiola Station, located in Section 5, Township 12 South, Range 38 East, Lea County, New Mexico. EMGR determined that soil had been contaminated by Total Petroleum Hydrocarbons (TPH) at concentrations that exceed the New Mexico Oil Conservation Division Recommended Remediation Action Levels. EMGR also determined that ground water had been contaminated by benzene, toluene, ethylbenzene, xylene, and total naphthalene at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). EMGR's Stage 1 Abatement Plan Proposal specifies that EMGR will: investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water, determine the geology and hydrogeology of the site and submit an investigation report.

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 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 the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.



**CONESTOGA-ROVERS
& ASSOCIATES**

Formerly BNC Environmental Services

2135 S. Loop 250 West
Midland, Texas 79703

Telephone: (432) 686-0086 Fax: (432) 686-0186
<http://www.craworld.com>

November 21, 2005

Reference No. 041244

Mr. Glenn Von Gonten
NEW MEXICO OIL CONSERVATION DIVISION
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RECEIVED
AP - 038

NOV 22 2005

**Oil Conservation Division
Environmental Bureau**

**Subject: Proof of Publication
Stage 1 Abatement Plan - Gladiola Station
Section 5, T-12-S, R-38-E
Lea County, New Mexico**

Dear Mr. Von Gonten:

Conestoga-Rovers and Associates (CRA) is pleased to submit the proof of publication as required by OCD Rule 19.G.(2) on behalf of ExxonMobil Refining and Supply - Global Remediation (EMGR). In an October 18, 2005 correspondence, the OCD determined the September 28, 2005 Stage 1 Abatement Plan submitted by CRA on behalf of EMGR was administratively complete. In addition, the OCD stated that prior to completing a technical review of the Stage 1 Abatement Plan, EMGR shall submit a notice of publication in the Santa Fe New Mexican and the Hobbs News-Sun. The OCD included a notice to use in the newspapers with their correspondence.

The provided notice was submitted to the Hobbs News-Sun and the Santa Fe New Mexican and placed in the Legal Notice section of the newspapers on October 21, 2005 and October 24, 2005, respectively. Affidavits of Publication and the Notice of Publication from both newspapers are included with this correspondence.

CRA apologizes for the delay in sending this information to the OCD. We did not receive the proof of publication from the Hobbs News-Sun in a timely manner. If you have any questions regarding the proof of publication, please call me at 432-686-0086.

Yours truly,
CONESTOGA-ROVERS & ASSOCIATES

Aaron M. Hale
Project Geologist

Encl.

c.c.: Jonathan Hamilton, EMGR - Baytown, Texas

Equal
Employment Opportunity
Employer

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a
newspaper published at
Hobbs, New Mexico, do solemnly
swear that the clipping attached
hereto was published once a
week in the regular and entire
issue of said paper, and not a
supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

October 21 2005

and ending with the issue dated

October 21 2005

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 21st day of

October 2005

Notary Public.

My Commission expires
February 07, 2009
(Seal)



OFFICIAL SEAL
DORA MONTZ
NOTARY PUBLIC
STATE OF NEW MEXICO

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

LEGAL NOTICE
October 21, 2005

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 Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Jonathan Hamilton, Exxon Mobil Refining and Supply Company - Global Remediation (EMGR), Telephone (281) 834-4731, 2800 Decker Drive, MOB NW-46, Baytown, TX 77520, has submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination that was discovered following a release of approximately 15 barrels of crude oil on November 14, 2002 as a result of a sump overflow/bleeder valve leak at a crude oil pipeline pumping station known as the Gladiola Station, located in Section 5, Township 12 South, Range 38 East, Lea County, New Mexico. EMGR determined that soil has been contaminated by Total Petroleum Hydrocarbons (TPH) at concentrations that exceed the New Mexico Oil Conservation Division Recommended Remediation Action Levels. EMGR also determined that ground water had been contaminated by benzene, toluene, ethylbenzene, xylene, and total naphthalene at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). EMGR's Stage 1 Abatement Plan Proposal specifies that EMGR will investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water, determine the geology and hydrogeology of the site and submit an investigation report.

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 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 the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.
#21871

02103917000 67534000
CRA INC.
2135 S. LOOP 250 WEST
MIDLAND, TX 79703

THE SANTA FE
NEW MEXICAN
Founded 1849

CRA Inc.
ATTN: Pam Winty
2135 S. Loop 250 West
Midland, TX 79703

ALTERNATE ACCOUNT: 01001
AD NUMBER: 00143396 ACCOUNT: 00000123
LEGAL NO: 77865 P.O. #:
190 LINES 1 TIME(S) 129.22
AFFIDAVIT: 5.50
TAX: 10.19
TOTAL: 144.91

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

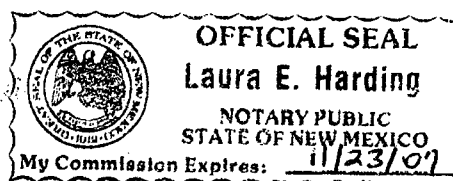
I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 77865 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/24/2005 and 10/24/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 24th day of October, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ R. Lara
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24th day of October, 2005

Notary Laura E. Harding

Commission Expires: 11/23/07



**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 Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Jonathan Hamilton, ExxonMobil Refining and Supply Company - Global Remediation (EMGR), Telephone (281) 834-4731, 2800 Decker Drive, MOB NW-46, Baytown, TX 77520, has submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination that was discovered following a release of approximately 15 barrels of crude oil on November 11, 2002, as a result of a sump overflow/bleeder valve leak at a crude oil pipeline pumping station known as the Gladiola Station, located in Section 5, Township 12 South, Range 38 East, Lea County, New Mexico. EMGR determined that soil had been contaminated by Total Petroleum Hydrocarbons (TPH) at concentrations that exceed the New Mexico Oil Conservation Division Recommended Remediation Action Levels. EMGR also determined that ground water had been contaminated by benzene, toluene, ethylbenzene, xylene, and total naphthalene at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). EMGR's Stage 1 Abatement Plan Proposal specifies that EMGR will: investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water, determine the geology and hydrogeology of the site and submit an investigation report.

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 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 the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments. Legal #77865
Pub. October 24, 2005



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

October 18, 2005

Mr. Jonathan Hamilton
ExxonMobil Refining and Supply Company
Global Remediation
2800 Decker Drive
MOB NW-46
Baytown, TX 77520

RE: STAGE 1 ABATEMENT PLAN - GLADIOLA STATION
SECTION 5, TOWNSHIP 12 SOUTH, RANGE 38 EAST
LEA COUNTY, NEW MEXICO
AP038

Dear Mr. Hamilton:

The New Mexico Oil Conservation Division (OCD) has reviewed the *Stage 1 Abatement Plan - Gladiola Station - Lea County, New Mexico* submitted on September 28, 2005, by Conestoga-Rovers & Associates on behalf of ExxonMobil Refining & Supply - Global Remediation (EMGR). EMGR submitted this Stage 1 Abatement Plan proposal to conduct a ground water and soil investigation at its Gladiola Station site, located in Section 5, Township 12 South, Range 38 East, Lea County, New Mexico, in response to OCD's letter of June 21, 2005.

In accordance with OCD Rule 19G.(2), OCD has determined that EMGR's Stage 1 Abatement Plan Proposal is administratively complete. Before OCD can complete a technical review of EMGR's Stage 1 proposal, EMGR shall:

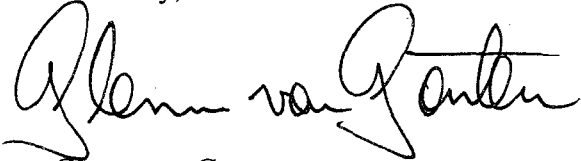
1. Issue the enclosed Stage 1 notice of publication in the Santa Fe New Mexican and the Hobbs News-Sun by October 30, 2005, pursuant to OCD Rule 19.G.(2).
2. Issue written notice of the Stage 1 proposal pursuant to OCD Rule 19.G.(1), prior to issuing public notice. A listing of "*those persons, as identified by the Director, who have requested notification*" pursuant to OCD Rule 19.G(1)(d) can be found at:

"http://www.emnrd.state.nm.us/ocd/bureaus/Environmental/Discharge_Permits/
WQCC%20Mailing%20List.doc."

3. Provide OCD with proof of publication and proof of written notice by November 4, 2005.

If you have any questions, please contact me at 505-476-3488.

Sincerely,

A handwritten signature in cursive script, reading "Glenn von Gonten". The signature is written in black ink and is positioned above the printed name and title.

Glenn von Gonten
Senior Hydrologist

cc: Mr. Larry Johnson, OCD Hobbs District Office

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 Oil Conservation Division Regulations, the following Stage 1 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 1220 St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

Jonathan Hamilton, ExxonMobil Refining and Supply Company - Global Remediation (EMGR), Telephone (281) 834-4731, 2800 Decker Drive, MOB NW-46, Baytown, TX 77520, has submitted a Stage 1 Abatement Plan Proposal to investigate ground water contamination that was discovered following a release of approximately 15-barrels of crude oil on November 11, 2002, as a result of a sump overflow/bleeder valve leak at a crude oil pipeline pumping station known as the Gladiola Station, located in Section 5, Township 12 South, Range 38 East, Lea County, New Mexico. EMGR determined that soil had been contaminated by Total Petroleum Hydrocarbons (TPH) at concentrations that exceed that the New Mexico Oil Conservation Division Recommended Remediation Action Levels. EMGR also determined that ground water had been contaminated by benzene, toluene, ethylbenzene, xylene, and total naphthalene at concentrations that exceed the New Mexico Water Quality Control Commission standards (see 20.6.2.3103(A) NMAC). EMGR's Stage 1 Abatement Plan Proposal specifies that EMGR will: investigate the ground water contamination at the site by advancing soil borings, installing monitor wells, monitoring and analyzing ground water; determine the geology and hydrogeology of the site; and, submit an investigation report.

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 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 the proposed Stage 1 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least 30 days from the date of publication of this notice for the submittal of written comments.



**CONESTOGA-ROVERS
& ASSOCIATES**

Formerly BNC Environmental Services, Inc.

2135 S. Loop 200 West

Midland, Texas 79703

Telephone: (432) 686-0086

Fax: (432) 686-0186

<http://www.craworld.com>

September 28, 2005

Reference No. 041244

Mr. Glenn Von Gonten
NEW MEXICO OIL CONSERVATION DIVISION
1220 S. St. Francis Drive
Santa Fe, NM 87505

RECEIVED
AP-038

SEP 29 2005

Re: Stage I Abatement Plan
Gladiola Station
Lea County, New Mexico

**Oil Conservation Division
Environmental Bureau**

Dear Mr. Von Gonten:

ExxonMobil Refining & Supply - Global Remediation (EMGR), is pleased to present this Stage I Abatement Plan for the Gladiola Station project as per your request. The Stage I Abatement Plan was prepared by Conestoga-Rovers & Associates on behalf of EMGR. Please feel free to contact the office if you have any questions at (432) 686-0086.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Aaron M. Hale P.G.
Project Manager

Encl.

Equal
Employment Opportunity
Employer



2800 Decker Drive, NW-63
Baytown, TX 77520
Telephone: (281) 834-4731
Facsimile: (281) 834-3604
Jonathan.k.hamilton@exxonmobil.com

JONATHAN K. HAMILTON
Remediation Project Manager
Downstream - Safety, Health & Environment

August 23, 2005

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

Re: Stage 1 Abatement Plan
Gladiola Station
Lea County, New Mexico

RECEIVED

AP-038

AUG 26 2005

**Oil Conservation Division
Environmental Bureau**

Dear Mr. Anderson:

ExxonMobil Refining & Supply - Global Remediation (EMGR), is pleased to present this Stage 1 Abatement Plan for the Gladiola Station project per your June 21, 2005 correspondence. The Stage 1 Abatement Plan was prepared by Conestoga-Rovers & Associates on behalf of EMGR in conjunction with the Oil Conservation Divisions Rule 19 (19.15.1.19 NMAC). EMGR is prepared to begin work upon written approval of the Stage 1 Abatement Plan.

Please feel free to contact me if you have any questions.

Sincerely,

Jonathan K. Hamilton
Global Remediation Project Manager

Attachments: Stage 1 Abatement Plan

Cc Mr. Larry Johnson, OCD Hobbs Office
Mr. Tommy Burrus, Landowner
CRA Midland
Electronic File



AP038

AP038

2800 Decker Drive, NW-63
Baytown, TX 77520
Telephone: (281) 834-4731
Facsimile: (281) 834-3604
Jonathan.k.hamilton@exxonmobil.com

JONATHAN K. HAMILTON
Remediation Project Manager
Downstream – Safety, Health & Environment

7 July 2005

NEW MEXICO OIL CONSERVATION DIVISION

1220 SOUTH ST. FRANCIS DR.
SANTA FE, NEW MEXICO 87505
ATTN: Mr. Roger C. Anderson

Re: Release Notification and Request to Submit Stage 1 Abatement Plan
Gladiola Station

2005 JUL 8 AM 9 39

Dear Mr. Anderson:

Per your request, ExxonMobil Global Remediation (EMGR) will submitted a Stage 1 Abatement Plan in accordance with OCD's Rule 19, by no later than August 26, 2005. If additional time is required, EMGR will seek to request a time extension by no than one week (five business days) prior to the August 26, 2005 due date. In addition to the Stage 1 Abatement Plan, EMGR will submit, as attachments, all information, field notes, and reports associated with response actions generated subsequent to the Gladiola Station release, which was reported to OCD in 2002. For your review, attached is a copy of the original C-141 (Attachment A1), per OCD's Rule 116 and a photo copy of a UPS shipping record documenting next day delivery of the C-141 to the District 1 office (Attachment A2). Also attached for your near- term review is a copy of an initial assessment report (Attachment B) completed as a result of a coring assessment to evaluation the release's impact to both the surface and subsurface. Site photos (Attachment C1, C2, and C3) are also present for your review.

EMGR would also like to communicate the purpose of the proposed work plan that was submitted to OCD in 2005. The objective of the 2005 work plan is to remobilize in an

attempt to fully delineate both soil and water. The summary of findings section (section IV) located on page 7 of the 2004 Soil and Groundwater Assessment report, clearly communicates the need for additional delineation and goes further to state soil and groundwater has not been fully delineated. EMGR will continue to seek OCD's approval for additional assessment at the subject location, however EMGR request for a work plan approval will come in the form of a Stage 1 Abatement Plan due August 26, 2005.

EMGR appreciates OCD's cooperation and efforts to support site progression. I look forward to working with you and your team to progress this site forward.

Please feel free to contact me if you wish to discuss this project further, or if you need additional information from EMGR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan K. Hamilton', with a stylized, cursive script.

Jonathan K. Hamilton

Attachments:

Photo copy C-141 (A1)

Photo copy UPS shipping record of C-141 from ExxonMobil Pipeline to Hobbs Office (A2)

Copy of Initial Assessment Report completed by contractors, post release (B)

Photos (C1, C2, & C3)

(ATTACHMENT A)

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Brazos Road, Aztec, NM 87410
District IV
1000 St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

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

FILE COPY

Form C-141
Revised March 17, 1999

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

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: ExxonMobil Pipeline Company for Mobil Pipeline Company	Contact: David B. Sterling, Pipeline / Public Safety Advisor
Address: 800 Bell Street, Houston, Texas 77002	Telephone No.: 713-656-2258
Facility Name: Gladiola Station	Facility Type: Injection

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section S4	Township T12	Range R38E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
-------------	---------------	-----------------	---------------	---------------	------------------	---------------	----------------	---------------

NATURE OF RELEASE

Type of Release: Crude Oil	Volume of Release: 15 barrels	Volume Recovered: 5 barrels
Source of Release: Station Piping	Date and Hour of Occurrence: 11-18-2002, 11:00	Date and Hour of Discovery: 11-18-2002, 11:00
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? State One Call	
Whom? Co Tech J.B. Garrison	Date and Hour 11-18-2002, 11:00	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

A bleeder valve was found to be in an open position, allowing the escape of the oil, and was closed.

Describe Area Affected and Cleanup Action Taken.*

Station pad and some pasture land was affected. The standing oil was collected utilizing a vacuum truck. The affected / contaminated soil will be remediated on site.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Karen R. Bailor</i>	Approved by District Supervisor:	
Printed Name: Karen R. Bailor	Approval Date:	Expiration Date:
Title: Operations Integrity Department Manager	Attached <input type="checkbox"/>	
Date: November 20, 2002 Phone: 713-656-0227	Conditions of Approval:	

(ATTACHMENT A2)

UPS **Worldwide Express**
Shipping Document

See instructions on back. Call 1-800-878-2834 (800-742-8877) for additional information.

1 **SHIP TO** **NUMBER** 1Z 77V 951 22 1000 012 0

2 **SHIP FROM** **ZIP CODE** 77V951

REFERENCE NUMBER Form C-141-Release

NAME Gale Williams **TELEPHONE** 713-856-5432

COMPANY EXXONMOBIL PIPELINE SERVICES

800 BELL ST #603A

CITY AND STATE HOUSTON TX **ZIP CODE** 77002

3 **EXTREMELY URGENT DELIVERY TO**

NAME District 1 - State of New Mexico **TELEPHONE**

COMPANY Oil Conservation Division

STREET ADDRESS 1625 N. French Drive **DEPT./FLR.**

CITY AND STATE (INCLUDE COUNTRY & INFORMATION) Hobbs, NM **ZIP CODE** 88240

SHIPPER'S COPY

4 **TYPE OF SERVICE** ☒ **FAST DAY** ☐ **EXPRESS**

5 **OPTIONAL SERVICES** ☐ **INSURANCE** ☐ **SAFETY**

6 **ADDITIONAL HANDLING CHARGE** ☐ **AMOUNT**

7 **TOTAL CHARGES** ☒ **AMOUNT**

8 **RECEIVERS / THIRD PARTY'S UPS ACCT. NO. OR MAJOR CREDIT CARD NO.** **EXPIRATION DATE**

THIRD PARTY'S COMPANY NAME

STREET ADDRESS

CITY AND STATE **ZIP CODE**

9 **DATE OF SHIPMENT** X Gale Williams

0101911202609 6/00 M

**B & H MAINTENANCE
& CONSTRUCTION, INC.** APO3B

**PIPELINE, TELECOMMUNICATIONS AND PLANT CONSTRUCTION
ENVIRONMENTAL AND REMEDIATION SERVICES**

505 394-2588
1-800 782-5901
FAX 505 394-2299
P.O. BOX 970
EUNICE, NM 88231

505 887-9755
505 887-7931
FAX 505 887-0369
P.O. BOX 98
CARLSBAD, NM 88220

915 550-8210
FAX 915 368-4031
2858 STEVEN ROAD
WEST LOOP 338
ODESSA, TX 79764

505 634-0460
FAX 505 634-0462
P.O. BOX 185
245 HWY. 544
BLOOMFIELD, NM 87413

(ATTACHMENT B)

ExxonMobil Pipeline Company
Midland West Area
Gladiola Station
Lea County, New Mexico
Soil Coring TPH Investigation

Executive Summary

Introduction

On July 29, 2003 ExxonMobil Pipeline Company (EMPCO) representatives Mike Hargrove and Robert Day met with B&H Maintenance and Construction, Inc. (B&H) environmental representatives Derek Robinson and Stacy Stribling in regards to a soil coring investigation to be conducted at the EMPCO Gladiola Station in Lea County, New Mexico. A plan of action was discussed at this time and a work schedule was established in regards to the soil coring investigation.

Scope

On July 31, 2003 B&H representatives Derek Robinson, Stacy Stribling, and Bryan Clay attended the required EMPCO safety orientation at the Seminole Station office and then traveled to the Gladiola Station in Lea County, New Mexico to begin the soil coring investigation. The leak source was a sump that had overflowed. The coring criteria was determined to drill and test for Total Petroleum Hydrocarbons (TPH) until the levels were under 100ppm. The first coring test point was twenty feet south of the sump. This coring point is in an area that had been partially excavated in removing the original spill area. Coring test point one began in a hard inundated caliche and limestone rock bed that underlies the entire region. The coring proved to be difficult because the hard thick limestone that was encountered between nine feet below grade to twenty-three feet below grade which was the total depth. Coring test point two was thirty feet southwest of the sump still within the previously excavated area and the same rock conditions were encountered. The total depth of test point two was ten feet. Test point three was thirty feet west of the sump and outside of the facility fence; the total depth of this coring point was ten feet. Test point four was twenty feet northwest of the sump and the total depth was ten feet. All test points show TPH levels below 100ppm except for test point number one. Because of the extreme difficulty in drilling it was determined by Robert Day of EMPCO that enough data had been collected to compile this report.



Conclusion

This soil coring investigation determined that the area south of the sump is contaminated below twenty-three feet with petroleum hydrocarbons that are above 100ppm. The area east and due north of the sump was not cored due to the flow of the spill that caused this investigation and also due to the presence of facility equipment. The results of this investigation would indicate that the remaining area is below required levels at the coring test points. This investigation would also indicate that the excavation of the known spill uncovered historical contamination. This contamination was determined to be historical due to the sub-surface conditions encountered, the nature and timely response to the spill, and the physical properties of the hydrocarbon contamination. This investigation would also indicate that the majority of the historical contamination has been excavated along with the excavation of the sump overflow spill affected area.



ENVIRONMENTAL SERVICES

2858 STEVEN ROAD ODESSA, TEXAS 79764 915-550-8210

ANALYTICAL REPORT FORM

CLIENT: ExxonMobil Pipeline

SITE: Gladiola Station

DATE OF COLLECTION: 7/31/03-8/7/03 DATE OF ANALYSIS: 7/31/03-8/7/03

ANALYST: Brvan Clay ANALYST I.D.# 0166

SAMPLE ID	SAMPLE TYPE	SAMPLE DATE	SAMPLE DEPTH	TPH/ppm
TP 1	GRAB	7/31/03	5'	6210
TP 1	GRAB	8/1/03	8'	1570
TP 1	GRAB	8/1/03	9'	570
TP 1	GRAB	8/4/03	10'	2470
TP 1	GRAB	8/4/03	12'	7520
TP 1	GRAB	8/4/03	15'	2300
TP 1	GRAB	8/4/03	18'	889
TP 1	GRAB	8/5/03	19'	584
TP 1	GRAB	8/7/03	22'	350
TP 1	GRAB	8/7/03	23'	510
TP 2	GRAB	8/5/03	5'	38
TP 2	GRAB	8/5/03	10'	44
TP 3	GRAB	8/6/03	5'	17
TP 3	GRAB	8/6/03	10'	25
TP 4	GRAB	8/7/03	5'	195
TP 4	GRAB	8/7/03	10'	63

ANALYST NOTES: _____

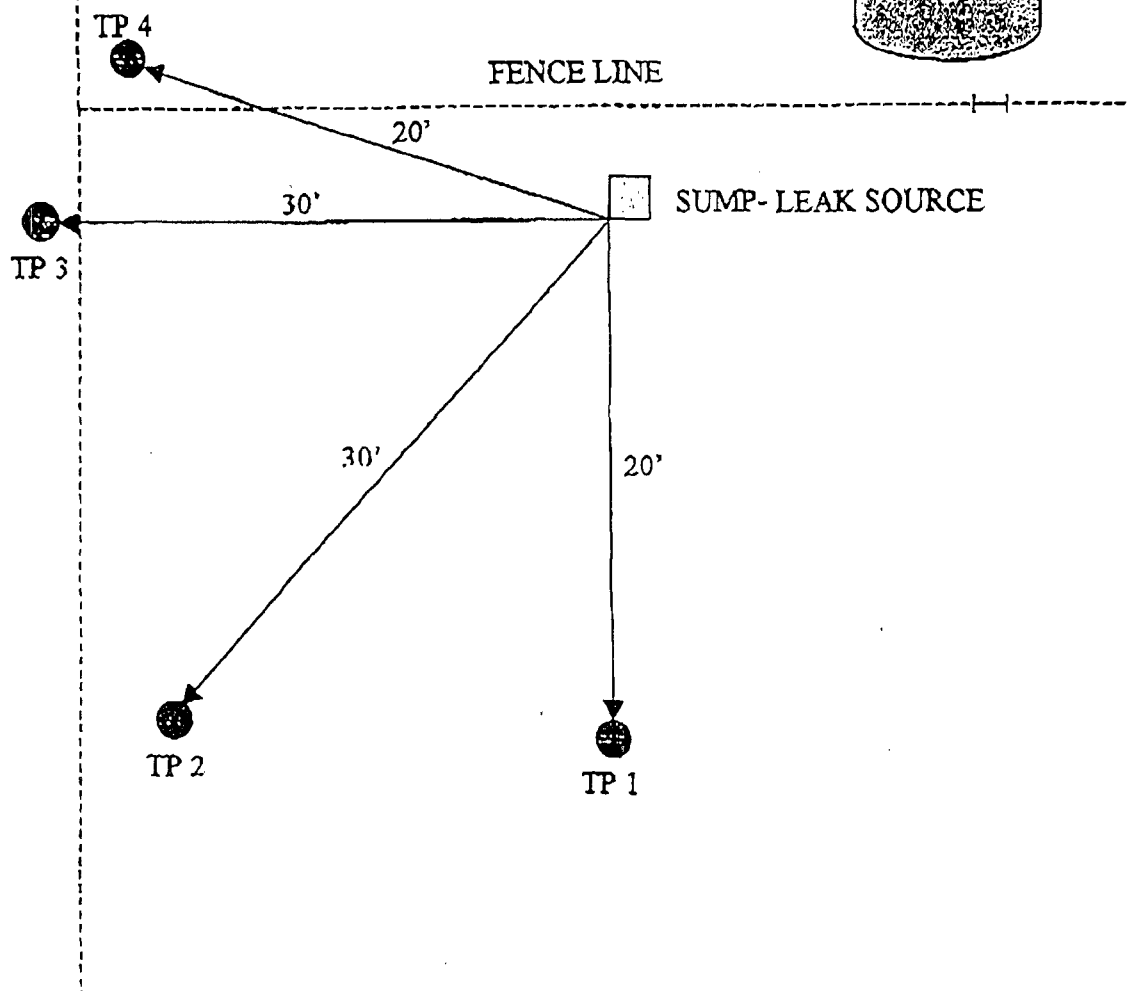
ANALYST SIGNATURE: _____

Conclusion

This soil coring investigation determined that the area south of the sump is contaminated below twenty-three feet with petroleum hydrocarbons that are above 100ppm. The area east and due north of the sump was not cored due to the flow of the spill that caused this investigation and also due to the presence of facility equipment. The results of this investigation would indicate that the remaining area is below required levels at the coring test points. This investigation would also indicate that the excavation of the known spill uncovered historical contamination. This contamination was determined to be historical due to the sub-surface conditions encountered, the nature and timely response to the spill, and the physical properties of the hydrocarbon contamination. This investigation would also indicate that the majority of the historical contamination has been excavated along with the excavation of the sump overflow spill affected area.



-Test Collection Points



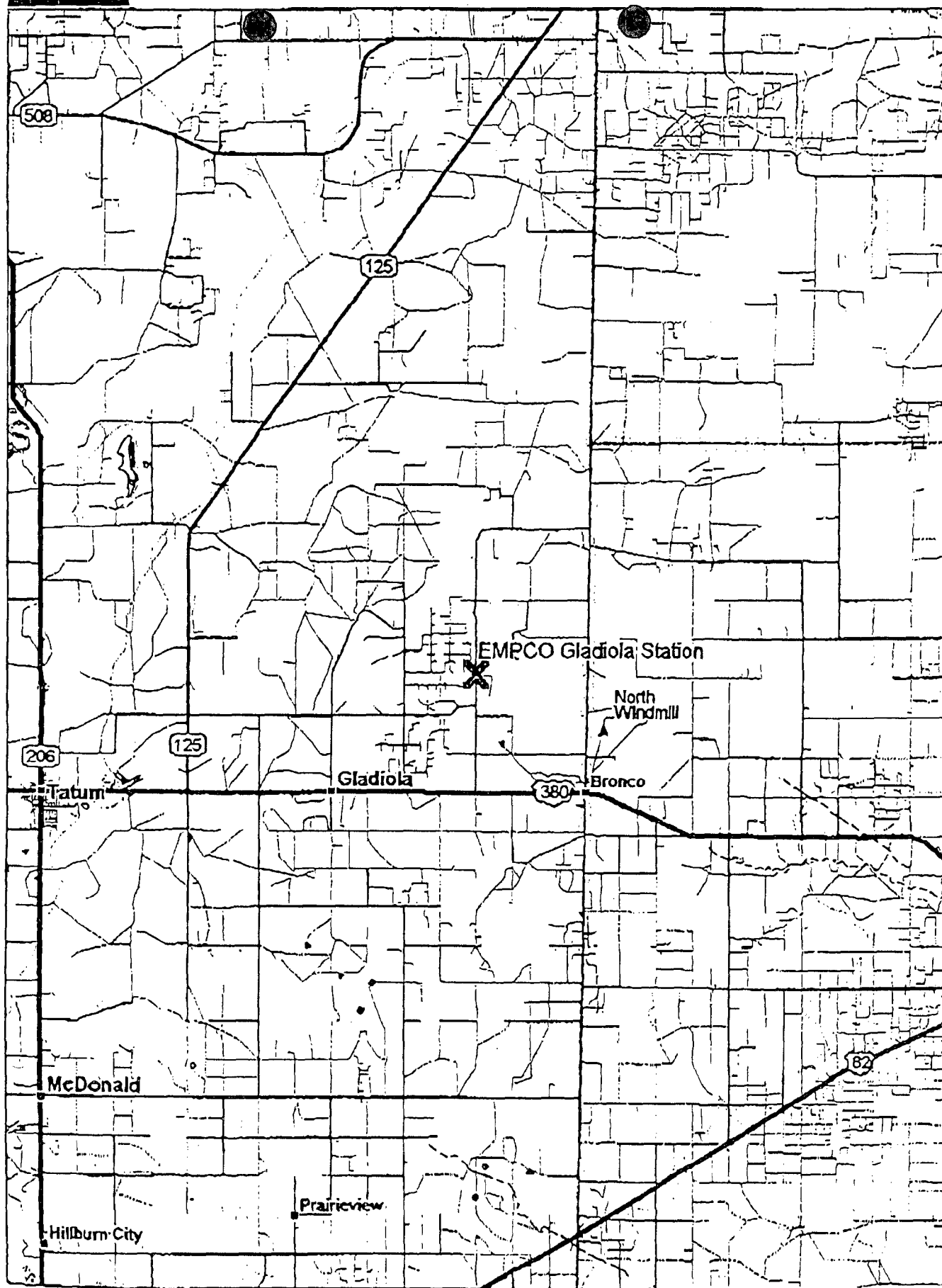
TPH Analysis

Sample Point	Sample Depth	Sample Analysis
TP 1	23'	510 ppm
TP 2	10'	44 ppm
TP 3	10'	25 ppm
TP 4	10'	63 ppm

Company:
ExxonMobil Pipeline Company
P.O. Box 670
Seminole, Texas 79360

Project:
Gladiola Station
33° 18' 12 N - 103° 06' 35 W
Lea County, New Mexico

B & H Environmental Services
2858 Steven Road
Odessa, Texas 79764
915-550-8210



33°18'03.36"N

33°18'03.24"N

33°18'03.12"N

33°18'03.00"N

33°18'02.88"N

103°06'41.16"W

103°06'41.04"W

103°06'40.92"W

103°06'40.80"W

EMPCO Gladiola Station Coring Investigation

Lat/Long
WGS 1984



Scale 1:100

0 0.003

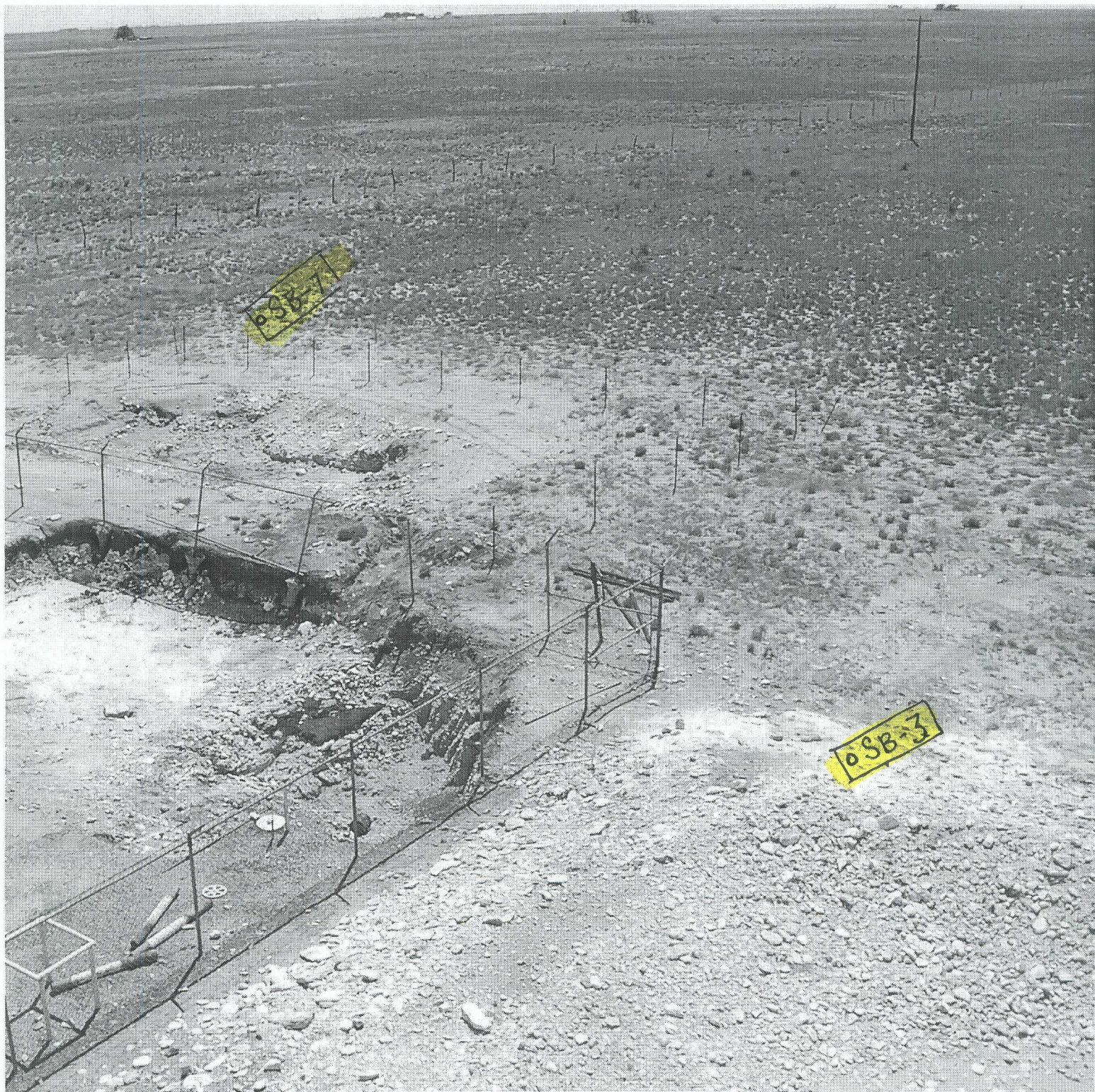


Kilometers

R080715A.SSF
8/11/2003

GPS Pathfinder Office

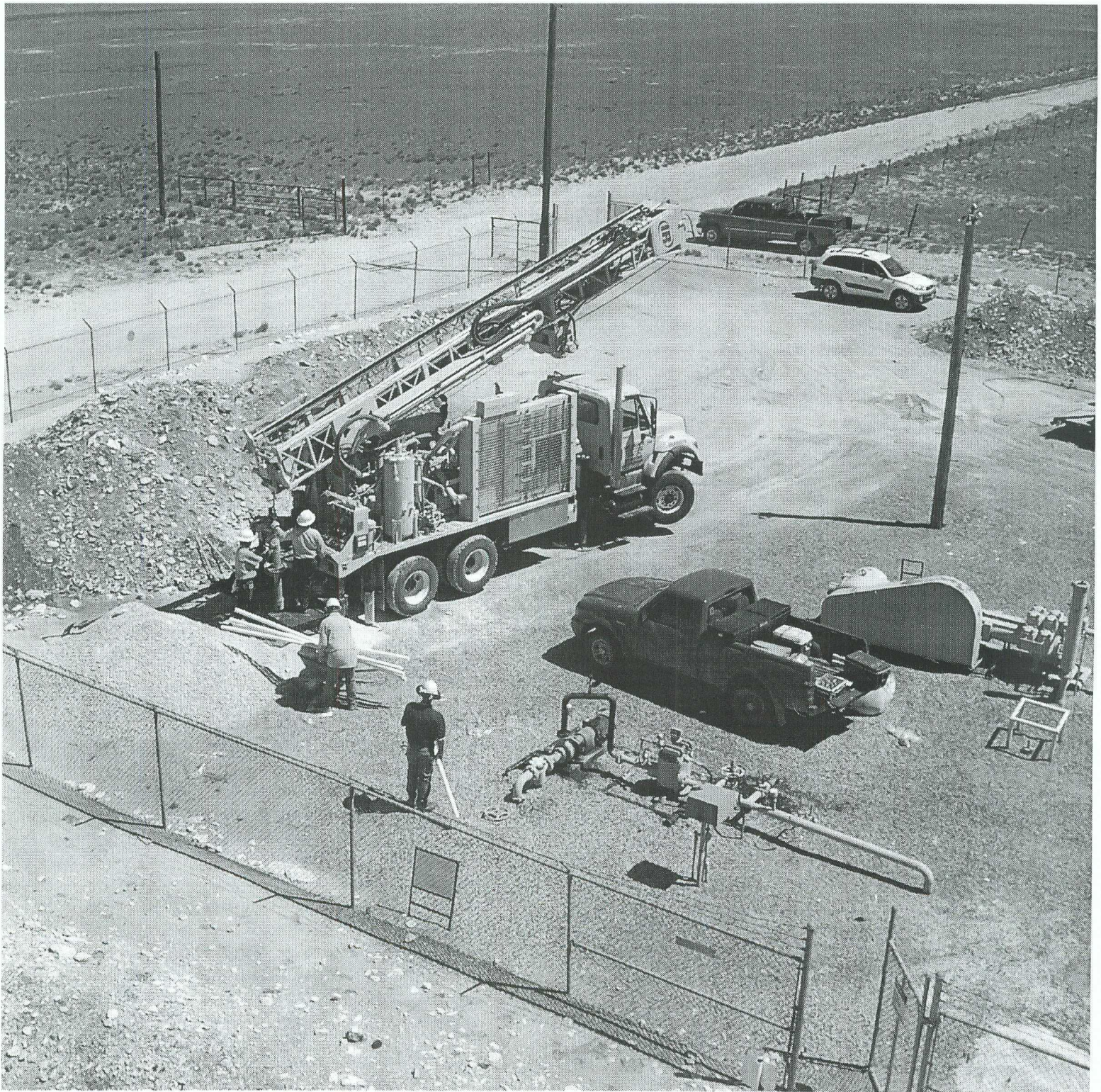




(ATTACHMENT C1)

NORTHWEST EXCAVATION - MW-1 Location

SEE Figure 3 (attached page 4) →



(ATTACHMENT C2)

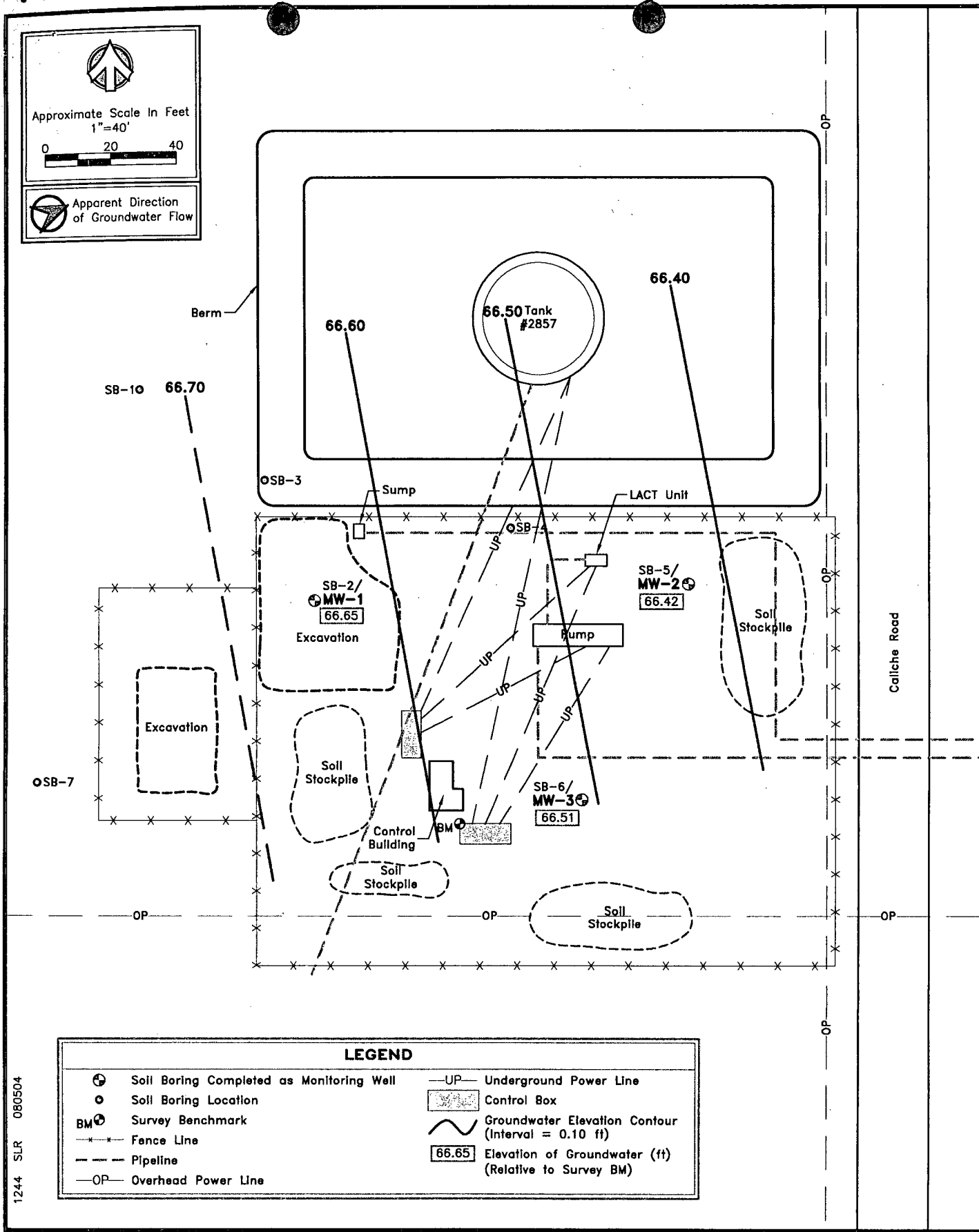
MW-2 INSTALLATION & STOCKPILE
NORTHWEST CORNER of Station

SEE Figure #3

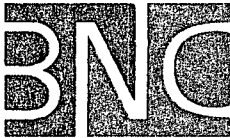


VIEW Looking directly South from Top
of Tank # 2857

The Trailer covers MW-3
SEE Figure 3



1244 SLR 080504



GROUNDWATER GRADIENT MAP — MAY 17, 2004

EXXONMOBIL GLOBAL REMEDIATION
GLADIOLA STATION LEA COUNTY, NEW MEXICO

JOB No. 1244

FIGURE 3



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

AP 038

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 21, 2005

CERTIFIED MAIL
RETURN RECEIPT NO: 7923 4474

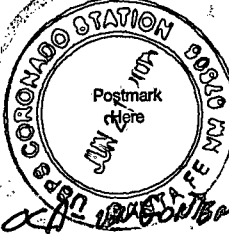
Mr. Jonathan Hamilton
ExxonMobil Refining and Supply Company
Global Remediation
2800 Decker Drive
MOB NW-46
Baytown, TX 77520

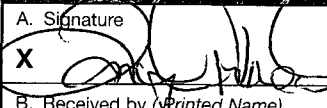
RE: REQUIREMENT TO SUBMIT STAGE 1 ABATEMENT PLAN
GLADIOLA STATION

Dear Mr. Hamilton:

On August 20, 2004, ExxonMobil Refining & Supply - Global Remediation (EMGR) submitted a *Soil and Groundwater Assessment Report* to the New Mexico Oil Conservation Division (OCD). On May 12, 2005, EMGR submitted a draft work plan in which it proposed to conduct supplemental investigative and remedial activities. The report and work plan were submitted to the OCD on EMGR's behalf by Conestoga-Rovers & Associates (formerly BNC Environmental Services, Inc.). After review, the OCD has determined that EMGR may be in violation of several regulatory requirements. The OCD will not approve EMGR's proposed work plan and hereby requires EMGR to submit a Stage 1 Abatement Plan in accordance with OCD's Rule 19 (19.15.1.19 NMAC) by no later than August 26, 2005.

EMGR's 2004 report documents a minor release of approximately 15 barrels of crude oil on November 16, 2002, at the ExxonMobil Gladiola Station. EMGR's report indicates that both soil and ground water have been impacted by this release. OCD's Rule 116 (Subsection B of 19.15.3.116 NMAC) requires the Responsible Person (RP) to verbally report all releases within twenty-four (24) hours of discovery to both the OCD's district office for the area within which the release takes place and to the OCD's Environmental Bureau Chief. The verbal notice must include all of the information specified on division Form C-141. In addition, the RP is also

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$ Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees	\$ 4.42 
Sent To JONATHAN HAMILTON - EMGR Street, Apt. No.; or PO Box No. 2800 DECKER AN MOB NW-46 AP038 City, State, ZIP+4 BAYTOWN, TX 77520	
PS Form 3800, January 2001 See Reverse for Instructions	

4244 E262	
SENDER: COMPLETE THIS SECTION	
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.	
1. Article Addressed to: JONATHAN HAMILTON EXXON MOBILE REFINING & SUPPLY CO. GLOBAL REMEDIATION 2800 DECKER AN MOB NW-46 BAYTOWN, TX 77520	
2. Article Number (Transfer from service label) 7001 1940 0004 7923 4474	
PS Form 3811, August 2001 Domestic Return Receipt 102595-01-M-2509	
COMPLETE THIS SECTION ON DELIVERY	
A. Signature X 	
B. Received by (Printed Name) Jonathan Hamilton	
C. Date of Delivery 10/28/05	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

required to submit a written notification within fifteen (15) days to both the OCD's district office for the area within which the release takes place and to the OCD's Environmental Bureau Chief by completing and filing division Form C-141. The written notification must verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. To date, OCD has not received the required verbal and written notices.

EMGR's proposed 2005 work plan indicates that the extent of the hydrocarbon-impacted soil has been delineated but that the extent of the hydrocarbon-impacted ground water has not been delineated. The OCD agrees that EMGR has not delineated the ground water contamination; however, the OCD rejects EMGR's assertion that the soil contamination has been delineated. EMGR has not defined both the lateral and vertical extent of soil contamination as required (see Section III.B of OCD's 1993 guidelines). EMGR should not backfill the excavations until further notice from the OCD.

Pursuant to Subsections C and E of OCD's Rule 19 (19.15.1.19 NMAC), the OCD requires that EMGR submit a Stage 1 abatement plan proposal by August 26, 2005. The Stage 1 abatement plan proposal shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. OCD has reviewed EMGR's report and has determined that several deficiencies and other problems must be addressed. EMGR's report refers to a workplan and reports prepared by BCN or others. EMGR must submit these documents with its Stage 1 Abatement Plan. EMGR must also provide a form C-141 to me and the OCD's Hobbs district office by July 8, 2005. Neither EMGR's 2004 report nor its 2005 work plan proposal adequately addresses the type and amount of soil contamination that was discovered (see of Section III.B of OCD's 1993 guidance). Therefore, EMGR must submit all information, including field notes, photos, *etc.*, collected by it or its contractors during its immediate response to the crude oil release to the OCD by July 8, 2005.

All future submittals to the OCD must be sent from EMGR rather than being submitted by a consultant. EMGR should provide two paper copies and one electronic copy of all future workplans and/or reports.

If you have any questions, please contact Glenn von Gonten of my staff at (505) 476-3488.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau Chief

cc: Mr. Larry Johnson, OCD Hobbs District Office



**CONESTOGA-ROVERS
& ASSOCIATES**

Formerly BNC Environmental Services

2135 S. Loop 250 West

Midland, Texas 79705

Telephone: (432) 686-0086

Fax: (432) 686-0186

<http://www.21newworld.com>

May 12, 2005

Reference No. 041244-2

AP 038

Mr. Roger Anderson
NEW MEXICO OIL CONSERVATION DIVISION
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Subject: Work Plan Approval for Site Investigation and Remediation Activities
Gladiola Station Crude Oil Release Site
Section 5, T-12-S, R-38-E
Lea County, New Mexico**

Dear Mr. Anderson:

Conestoga-Rovers & Associates (CRA), formerly BNC Environmental Services, Inc. (BNC), is pleased to present this work plan for the Gladiola Station (hereafter referred to as "Site") on behalf of ExxonMobil Refining & Supply - Global Remediation (EMGR). This work plan is for conducting supplementary investigative and remedial activities associated with a crude oil release that occurred at the Site on November 18, 2002 while the facility was operated by ExxonMobil Pipeline Company (EMPCo). The release was the result of a sump overflow/bleeder valve leak. The crude oil release was reported as fifteen barrels lost and five barrels recovered. The project is located in Section 5, T-12-S, R-38-E in Lea County, New Mexico on property currently owned by the 07 Ranch. The facility is currently operated by Centurion Pipeline L.P (Centurion), formerly Trojan Pipeline L.P.

CRA is presenting this work plan to the NMOCD with the intent to further delineate the impacted groundwater, complete remedial excavation backfilling, and properly dispose of existing soil stockpiles at the site. NMOCD Workplan approval is requested prior to initiating the field work.

PROJECT BACKGROUND

Previous assessment work performed at the Site as a result of this release included:

1. Initial excavation activities were performed at the Site by E.D. Walton in August 2003.
2. A soil boring investigation was conducted by B&H Maintenance & Construction, Inc. (B & H) in August 2003 to assess the horizontal and vertical extent hydrocarbon impacts at the Site. A summary of initial assessment activities relating to the release on November 18, 2002 was presented to EMPCo in a document entitled *Soil Coring Investigation Report* prepared by B&H in August 2003.

Equal
Employment Opportunity
Employer



**CONESTOGA-ROVERS
& ASSOCIATES**

May 12, 2005

2

Reference No. 041244-2

3. On October 8, 2003, BNC and EMGR personnel conducted a Site visit and noted two remedial excavation areas (one onsite area and one offsite area). Four soil stockpiles associated with the onsite and offsite excavations were also identified on the station property. These soil stockpiles are the result of the excavation activities resulting from the November 18, 2002 release.
4. In October 2003, BNC prepared and submitted a work scope EMGR to continue the assessment phase of the remedial activities at the Site. In May 2004, BNC continued both soil and groundwater investigation activities. During this investigation, soil hydrocarbon impacts exceeding NMOCD and groundwater hydrocarbon impacts exceeding New Mexico Water Quality Control Commission (NMWQCC) guidelines were encountered.
5. BNC submitted a report on the Site entitled "Soil and Groundwater Assessment Report", dated August 20, 2004 to the New Mexico Oil Conservation Division (NMOCD) offices in Santa Fe and Hobbs, Centurion and the landowner.
6. On November 30, 2004, BNC conducted a groundwater gauging event. Measurable light non-aqueous phase hydrocarbons (LNAPL) were encountered in all three existing monitoring wells (MW-1, MW-2 & MW-3).

After evaluating historical site information and completing a soil and groundwater assessment, CRA has concluded that the extent of the hydrocarbon-impacted soil has been delineated; however, the extent of the hydrocarbon-impacted groundwater has not been delineated.

The following sections summarize the proposed soil and groundwater activities that will be performed pending NMOCD approval.

HEALTH AND SAFETY PLAN

A project specific Health and Safety Plan (HASP) will be developed and reviewed by CRA prior to conducting any remedial activities at the Site. Safety and health concerns associated with this project include working around the former excavation area, heavy equipment, drilling monitoring wells, hydrocarbon-impacted soils, existing crude oil pipelines and subsurface utilities associated with facility operations. The CRA project manager will implement the HASP in the field and tailgate safety meetings involving task specific activities (i.e. drilling activities, soil disposal activities, backfilling activities) will be discussed each morning in accordance with the HASP objectives.

In addition to the HASP, work will be executed at the site according EMGR Operations and Integrity Management System (OIMS) and Loss Prevention Systems (LPS) requirements. OIMS requirements include: project start notification, contractor orientation meetings, pre-start safety review, and task specific job safety analysis (JSA) form completion. Task specific JSAs will be completed prior to arrival onsite. The JSAs will be disseminated and reviewed by all site workers prior to the start of the job. Any changes by the JSA development team will be made and the JSAs will be sent to EMGR for review and final comment. All employees performing work at the site will be trained in the LPS system. In addition,



**CONESTOGA-ROVERS
& ASSOCIATES**

May 12, 2005

3

Reference No. 041244-2

LPS Loss Prevention Observations (LPOs) will be completed for various tasks during the backfilling activities.

GROUNDWATER MONITORING WELL INSTALLATION

The primary objective of the proposed monitoring well program is to further evaluate the extent of existing hydrocarbon affected groundwater at the location of the release. CRA is proposing to install four, 4-inch groundwater monitoring wells to an approximate depth of 40-feet bgs utilizing air rotary methods (FIGURE 1). Discrete, undisturbed soil samples will be collected in 5-foot intervals by removing the drilling bit and installing a steel soil-sampling coring barrel (1-foot in length) and rotating it into the soil or by pushing a split-spoon device. In addition, drill cuttings samples will be collected, logged, and field screened with a photo-ionization detector (PID) on a continuous basis during program. Generated drill cuttings will be placed on plastic and characterized for future waste management.

Each 1-foot soil sample collected from the coring tool will be divided into two samples: one sample will be sealed in a new plastic re-sealable bag; and the other sample will be immediately placed into a laboratory-supplied, 4-ounce soil jar equipped with a Teflon-lined lid and placed on ice in an insulated cooler. The bagged sample will be allowed time to volatilize, leaving a headspace for volatile organic compounds (VOCs) to collect. After sufficient time for volatilization has elapsed, the headspace will be screened for the presence of VOCs using a PID. In addition, CRA's field geologist will describe the lithology using the Unified Soil Classification System and log visual and olfactory observations as well as PID readings for evaluation of the presence of hydrocarbons.

Soil samples will be submitted to SPL in Houston, Texas and analyzed for TPH concentrations by EPA Method 8015 modified for diesel range organics (DRO) and gasoline range organics (GRO) as well as, BTEX concentrations by EPA Method 8021B and chlorides by EPA Method E300 MOD. For budgeting purposes, the soil sample exhibiting the highest VOC measurement within the vadose zone and the vadose zone sample immediately above the phreatic zone will be submitted for laboratory analysis. A composite sample of the drill cuttings will be submitted for Reactivity, Corrosivity, and Ignitability (RCI), TPH (GRO/DRO), BTEX, and Total Metals (RCRA 8 Metals) analysis for waste characterization.

Monitoring wells will be drilled and completed to specifications as required by the New Mexico Office of the State Engineer by a New Mexico-licensed water well driller. Four-inch, flush-threaded, Schedule 40 PVC casing is selected for use at the site for all wells. Each well will be constructed of 20 feet of 0.020-inch screened-casing placed at the bottom of each well, extending several feet above the soil/groundwater interface. The well annulus will be filled with a sand filter pack to approximately 2-feet above the top of the screen interval, a bentonite seal will be placed on top of the sand and the well annulus cemented to the surface to mitigate surface runoff from entering the water table through the annulus. In addition, a State of New Mexico licensed surveyor will be utilized to prepare a site map and determine horizontal and vertical control for each monitoring well. Monitoring well information will be documented in well record forms submitted to the New Mexico Office of the State Engineer.



**CONESTOGA-ROVERS
& ASSOCIATES**

May 12, 2005

4

Reference No. 041244-2

Information collected from the groundwater monitoring well installation program will be compiled and summarized within a Supplementary Soil and Groundwater Assessment Report. Soil boring logs (including well construction information) and cross sections will be developed to illustrate existing soil conditions, the nature and extent of affected soils and any exceedences in groundwater concentrations. Soil concentrations will be evaluated using NMOCD's regulatory standards for TPH, BTEX and Chlorides.

Monitoring wells will be developed by removal of sufficient volumes of water to clear the well casing and annulus of sediment. Upon completion of well development activities, the monitoring wells will be gauged with an oil/water interface probe to measure static water levels and measure any thickness of LNAPL present in the wells. Once static water levels have been obtained, each well not containing LNAPL will be purged the equivalent of three casing volumes or until dry using a new, disposable bailer. Purge water from the sampling activities will be transferred to DOT-approved 55-gallon steel drums onsite for proper waste management and disposal. Representative groundwater samples will be collected, placed in appropriated laboratory supplied containers, and preserved on ice in insulated coolers. Groundwater samples will be chilled to a temperature of approximately 4° C (40°F) for laboratory analyses and will be submitted to SPL, Houston for analyses of BTEX by EPA Method 8021B, and Total Napthalene concentrations by EPA Method 8310. Selections of sample analyses were based on an initial groundwater assessment activities conducted at the site in May 2004. All other polycyclic aromatic hydrocarbons (PAH's), metals and general groundwater quality parameters (i.e. total dissolved solids, total alkalinity, chloride & sulfate) concentrations were either below laboratory detection levels or below their NMWQCC's maximum allowable toxic pollutant concentration human health standard for groundwater in the initial groundwater analysis.

SOIL STOCKPILE DISPOSAL AND EXCAVATION BACKFILLING

This portion of the work plan provides details for the removal of soil stockpiles remaining onsite and proposed backfilling activities. An estimated 400 cubic yards of soils from the remedial excavations are stockpiled at four different locations within the station. The waste characterization sample previously collected during CRA's site assessment demonstrated that the waste is did not exhibit hazard characteristics. The NMOCD C-138 form entitled *Request for Approval to Accept Solid Waste* was submitted in 2004 by the landfarm and subsequently was approved by the NMOCD. Additionally, the certificate of waste status form identifies the material as "non-exempt waste." The forms are provided in Appendix A.

Although soils in the bottom of the excavation may currently exceed NMOCD remediation limits for TPH, no further excavation activities are planned due to site safety reasons. The presence of buried pipelines, the location of station equipment (pumps, control buildings, and LACT unit), maintaining the containment berm of Tank #2057, and preserving the foundation integrity of Tank #2857 have precluded any additional excavation activities (FIGURE 1). This issue is a concern of the current operator (Centurion), EMGR and CRA. In addition, the soils encountered in the bottom of the excavation include well cemented caliche and limestone. The heavy machinery necessary to remove this rock presents an increased potential of damage to the pipelines in and around the excavation and an increased risk for releasing pipeline contents into the excavation. Subsequently, backfilling of the remedial excavation is



**CONESTOGA-ROVERS
& ASSOCIATES**

May 12, 2005

5

Reference No. 041244-2

being proposed as a best management practice for the project considering the associated safety issues. In-situ soil remediation options will be evaluated upon completion of subsequent soil and groundwater delineation activities.

Prior to beginning the soil disposal and backfilling activities, the monitoring wells within the work area will be marked with tall flags to prevent accidental damage from the earth moving equipment. The soil disposal activities will consist of loading and transporting the stockpiles to an approved EMGR waste management facility and backhauling fill material and topsoil to backfill the existing excavations. The soil stockpiles at the station will be transported to J&L Landfarm, Inc. (J&L) in Hobbs, New Mexico as identified on Form C-138 (attached). J&L is the closest EMGR approved waste facility to the site. Clean fill material will be purchased from the landowner to backfill the excavations within the station and the excavation adjacent to the west side of the station. The excavation adjacent to the station will be covered with clean, topsoil to facilitate vegetation growth. A CRA representative will be present during all loading/unloading and backfilling activities to implement OIMS and LPS protocol and collect bills of lading.

CRA is prepared to begin the aforementioned Site activities following the NMOCD's concurrence and approval of this work plan and upon EMGR's receipt of a formal Site access agreement. The NMOCD will be notified 4-days in advance prior to any Site activities. If you have any questions or comments, please feel free to contact the Midland office at (432) 686-0086.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

James Ornelas
Project Scientist

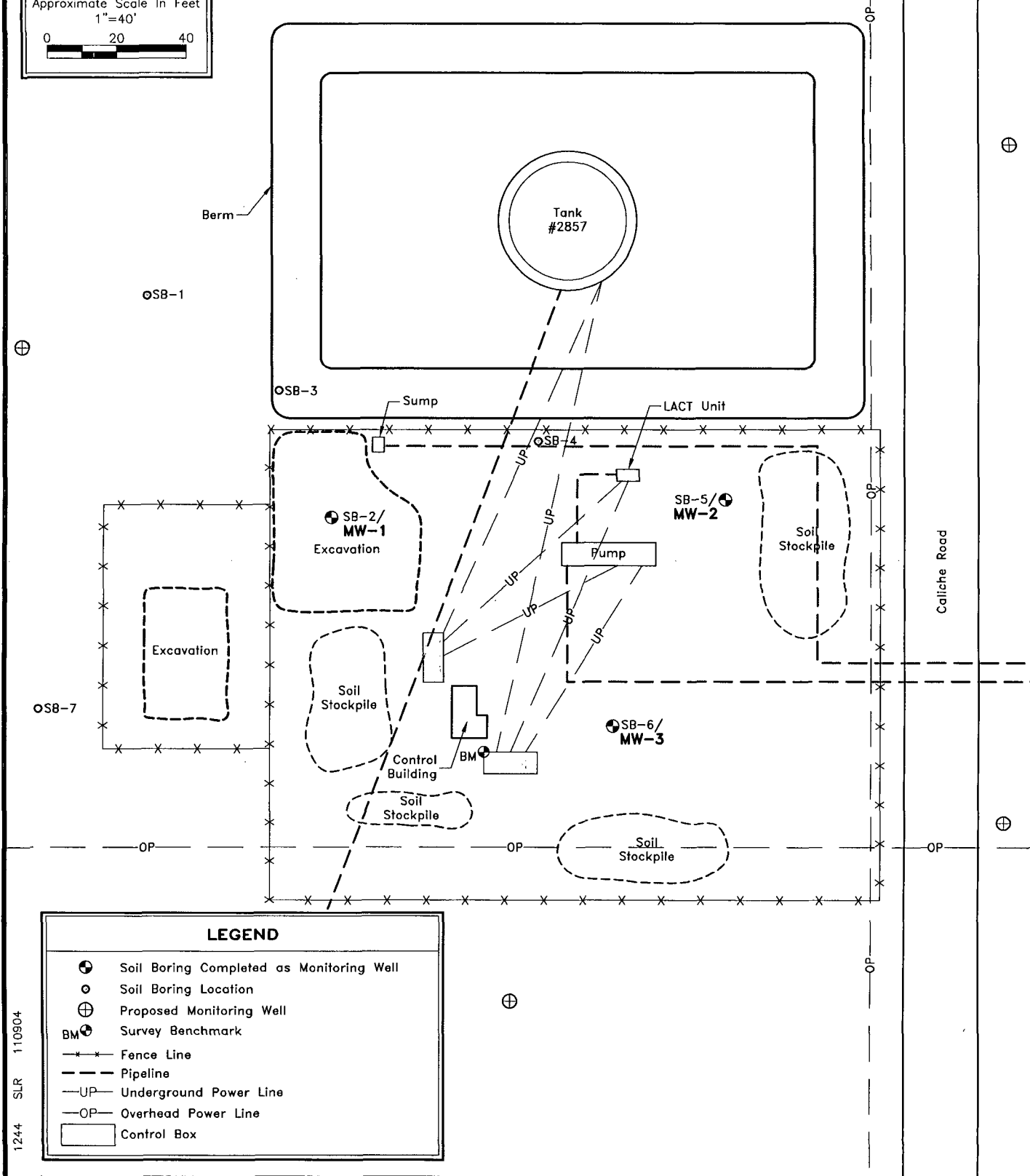
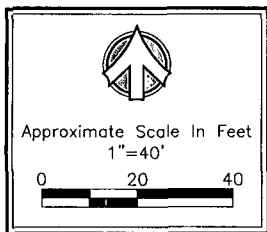
Aaron M. Hale
Project Geologist

Thomas C. Larson
Midland Operations Manager

JO/AMH/TCL/shw

Encl. FIGURE 1 Site Details Map
 Appendix A NMOCD Form C-138 *Request for Approval to Accept Solid Waste and Certificate of Waste Status*

c.c.: Jonathan Hamilton - EMGR Baytown, Texas
 NMOCD - District 1, Hobbs, New Mexico
 Bill Von Drehle - Centurion Pipeline L.P., Houston, Texas
 Burt Anderson - Centurion Pipeline L.P., Midland, Texas
 Tommy Burris - Landowner
 Conestoga-Rovers & Associates file - Midland, Texas



PROPOSED GROUNDWATER MONITORING WELL LOCATION MAP

EXXONMOBIL GLOBAL REMEDIATION
GLADIOLA STATION LEA COUNTY, NEW MEXICO

JOB No. 1244

FIGURE 1

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-138
Revised March 17, 1999

Submit Original
Plus 1 Copy
to Appropriate
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>EXXONMOBIL</u>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>GLADISLA STATION</u>
2. Management Facility Destination <u>JOL LANDFARM, INC</u>	6. Transporter <u>UNKNOWN</u>
3. Address of Facility Operator <u>Q-RD - C45 / EUNICE-HOBBS HWY</u> <u>HWY 18</u>	8. State <u>TATUM NEW MEXICO</u>
7. Location of Material (Street Address or ULSTR)	
<p>9. <u>Circle One:</u></p> <p>A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.</p> <p>B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.</p> <p>All transporters must certify the wastes delivered are only those consigned for transport.</p>	

BRIEF DESCRIPTION OF MATERIAL:

NON-HAZARDOUS, HYDROCARBON SAIL

Estimated Volume _____ cy Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE Judy L. Roberts TITLE President DATE 9/30/04
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: Judy L. ROBERTS TELEPHONE NO. 505-392-9697
505-631-5765

(This space for State Use)

APPROVED BY [Signature] TITLE Environ. Engr. DATE 10-4-04
APPROVED BY _____ TITLE _____ DATE _____

Certificate of Waste Status

NMOCD 711 FACILITY: J&L LANDFARM, INC.

GENERATOR EXXON MOBILGENERATING SITE GLADDOCK STATION

SEC _____ TOWNSHIP _____ RANGE _____

COUNTY LEA STATE NMWASTE DESCRIPTION NON-HAZARDOUS SOIL WASTE QTY. _____

TRUCKING COMPANY _____

EXEMPT WASTE _____

As a condition of acceptance for disposal, I hereby certify that this waste is an exempt waste as defined by the EPA (Environmental Protection Agency). Waste is generated from oil and gas exploration and production operations; exempt from RCRA (Resource Conservation and Recovery Act, Subtitle C regulations. I do certify that hazardous or listed waste pursuant to EPA provisions has not been added or mixed with the waste, nor mixed with any non-exempt material.

NON-EXEMPT WASTE ☒

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the EPA's (Environmental Protection Agency) July 1988 Regulatory determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has not been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3.

I certify that this waste has been surveyed for Naturally Occurring Radioactive Material (NORM) and NORM concentrations do not exceed that listed in 20 NMAC 3.1 Subpart 1402. C and D.

COMPANY AGENT _____
(Original Signature)

(Name)

ADDRESS _____

DATE _____