

1R - 358

**GENERAL
CORRESPONDENCE**

YEAR(S):

2003-2001

Martin, Ed

To: Sheeley, Paul
Subject: Amerada Hess NMGSAU Battery No. 67 (May Love Battery)

I have a letter from Sam Small referring to a closure request for this site dated 7/7/03. Do you have a copy of this request? Is this something you and/or Larry is handling in the District?

Ed Martin

New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3471

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 432/758-6741
FAX 432/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
432/758-6700

August 6, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0003 1887 7858

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 North French Dr,
Hobbs, New Mexico 88240

RE: **ENV-STUDIES, SURVEYS & REPORTS** IR-358
SITE REMEDIATION
NMGSAU Battery No. 67 (May Love Battery)
SE ¼, SE ¼, Sec 32, T-19S, R-37E, Lea County

RECEIVED
HOBBS
AUG 6 2003

Dear Mr. Sheeley:

Pursuant to your request of July 1, 2003, attached are the latest analytical results on samples collected from the monitor wells located at the abandoned NMGSAU Battery No. 67 (Chevron May Love) site. The results indicate that there is no hydrocarbon contamination in the water sampled from any of the wells. Chloride concentrations in monitor wells 1 (up-dip well) and 4 are slightly elevated. The analytical results are consistent with the previous sampling event on October 17, 2001, which are also included in the attached table No 1. The ETGI technician was unable to collect a sample from beneath the east side of the excavation due to the presence of excessive caliche. An attempt to collect a sample will be made during the backfill operation.

AHC is requesting approval of the closure plan submitted to the NMOCD on July 7, 2003 so that arrangements can be made with the landowner to move this project forward. If you have any questions, please contact the undersigned at 432-758-6741 or at the letterhead address.

Sincerely,

Samuel Small, PE
Environmental Coordinator

Xc: NMOCD – Santa Fe
Houston Environmental File
PB Environmental File
Monument Area File

**Groundwater Analyses (TPH)
 NMGSAU Battery No.67
 (Chevron May Love)**

Sample Location	Sample Date	Benzene	Toluene	Ethyl-Benzene	Xylene	Chloride
MW - 1	07/08/2003	< 0.001	< 0.001	< 0.001	0.002	266
MW - 2	07/08/2003	< 0.001	< 0.001	< 0.001	< 0.001	248
MW - 3	07/08/2003	< 0.001	< 0.001	< 0.001	0.001	186
MW - 4	07/08/2003	< 0.001	< 0.001	< 0.001	< 0.001	257
MW - 1	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	266
MW - 2	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	248
MW - 3	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	213
MW - 4	10/17/2001	< 0.001	< 0.001	< 0.001	< 0.001	301

ANALYTICAL REPORT

Prepared for:

**Camille Reynolds
Environmental Technology Group, Inc.
2540 W. Marland
Hobbs, NM 88240**

Project: Chevron Maylove

PO#: AHL-1205R

Order#: G0306916

Report Date: 07/14/2003

Certificates

US EPA Laboratory Code TX00158

ENVIRONMENTAL LAB OF TEXAS

SAMPLE WORK LIST

Environmental Technology Group, Inc.
 2540 W. Marland
 Hobbs, NM 88240
 505/397/4701

Order#: G0306916
 Project:
 Project Name: Chevron Maylove
 Location: None Given

The samples listed below were submitted to Environmental Lab of Texas and were received under chain of custody. Environmental Lab of Texas makes no representation or certification as to the method of sample collection, sample identification, or transportation/handling procedures used prior to the receipt of samples by Environmental Lab of Texas, unless otherwise noted.

<u>Lab ID:</u>	<u>Sample:</u>	<u>Matrix:</u>	<u>Date / Time</u>		<u>Container</u>	<u>Preservative</u>
			<u>Collected</u>	<u>Received</u>		
0306916-01	MW-1	WATER	7/8/03 9:20	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-02	MW-2	WATER	7/8/03 9:31	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-03	MW-3	WATER	7/8/03 9:45	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		
0306916-04	MW-4	WATER	7/8/03 10:00	7/8/03 14:26	See COC	ice
	<u>Lab Testing:</u> 8021B/5030 BTEX Chloride	Rejected: No		Temp: 4.0 C		

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Camille Reynolds
 Environmental Technology Group, Inc.
 2540 W. Marland
 Hobbs, NM 88240

Order#: G0306916
 Project:
 Project Name: Chevron Maylove
 Location: None Given

Lab ID: 0306916-01
 Sample ID: MW-1

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0006126-02		7/12/03 15:36	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	0.002	0.001
o-Xylene	0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	94%	80	120
Bromofluorobenzene	95%	80	120

Lab ID: 0306916-02
 Sample ID: MW-2

8021B/5030 BTEX

Method Blank	Date Prepared	Date Analyzed	Sample Amount	Dilution Factor	Analyst	Method
0006126-02		7/10/03 1:00	1	1	CK	8021B

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	109%	80	120
Bromofluorobenzene	99%	80	120

DI. = Diluted out N/A = Not Applicable RL = Reporting Limit

Page 1 of 3

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Carrie Reynolds
 Environmental Technology Group, Inc.
 2540 W. Marland
 Hobbs, NM 88240

Order#: G0306916
 Project:
 Project Name: Chevron Maylove
 Location: None Given

Lab ID: 0306916-03
 Sample ID: MW-3

8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0006126-02		7/12/03	1	1	CK	8021B
		15:58				

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	96%	80	120
Bromofluorobenzene	96%	80	120

Lab ID: 0306916-04
 Sample ID: MW-4

8021B/5030 BTEX

Method	Date	Date	Sample	Dilution	Analyst	Method
Blank	Prepared	Analyzed	Amount	Factor		
0006126-02		7/10/03	1	1	CK	8021B
		12:10				

Parameter	Result mg/L	RL
Benzene	<0.001	0.001
Toluene	<0.001	0.001
Ethylbenzene	<0.001	0.001
p/m-Xylene	<0.001	0.001
o-Xylene	<0.001	0.001

Surrogates	% Recovered	QC Limits (%)	
aaa-Toluene	108%	80	120
Bromofluorobenzene	101%	80	120

DL = Diluted out N/A = Not Applicable RL = Reporting Limit

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Camille Reynolds
Environmental Technology Group, Inc.
2540 W. Mariand
Hobbs, NM 88240

Order#: G0306916
Project:
Project Name: Chevron Maylove
Location: None Given

Approval: *Celcy D. Keene* 07/14/03
Raland K. Tuttle, Lab Director, QA Officer Date
Celcy D. Keene, Org. Tech. Director
Jeanne McMurrey, Inorg. Tech. Director
Sandra Biezugbe, Lab Tech.
Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS

ANALYTICAL REPORT

Camille Reynolds
Environmental Technology Group, Inc.
2540 W. Marland
Hobbs, NM 88240

Order#: G0306916
Project:
Project Name: Chevron Maytovc
Location: None Given

Lab ID: 0306916-01
Sample ID: MW-1

Test Parameters			Dilution			Date	
<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Factor</u>	<u>RL</u>	<u>Method</u>	<u>Analyzed</u>	<u>Analyst</u>
Chloride	266	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-02
Sample ID: MW-2

Test Parameters			Dilution			Date	
<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Factor</u>	<u>RL</u>	<u>Method</u>	<u>Analyzed</u>	<u>Analyst</u>
Chloride	248	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-03
Sample ID: MW-3

Test Parameters			Dilution			Date	
<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Factor</u>	<u>RL</u>	<u>Method</u>	<u>Analyzed</u>	<u>Analyst</u>
Chloride	186	mg/L	1	5.00	9253	7/9/03	SB

Lab ID: 0306916-04
Sample ID: MW-4

Test Parameters			Dilution			Date	
<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Factor</u>	<u>RL</u>	<u>Method</u>	<u>Analyzed</u>	<u>Analyst</u>
Chloride	257	mg/L	1	5.00	9253	7/9/03	SB

Approval: Cecily D. Keene 07/14/03
 Rafand K. Tuttle, Lab Director, QA Officer Date
 Cecily D. Keene, Org. Tech. Director
 Jeanne McMurrey, Inorg. Tech. Director
 Sandra Biczugbc, Lab Tech.
 Sara Molina, Lab Tech.

ENVIRONMENTAL LAB OF TEXAS**QUALITY CONTROL REPORT****8021B/5030 BTEX**

Order#: G0306916

BLANK		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
WATER							
Benzene-mg/L		0006126-02			<0.001		
Toluene-mg/L		0006126-02			<0.001		
Ethylbenzene-mg/L		0006126-02			<0.001		
p/m-Xylene-mg/L		0006126-02			<0.001		
o-Xylene-mg/L		0006126-02			<0.001		
MS		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
WATER							
Benzene-mg/L		0306927-01	0	0.1	0.101	101.0%	
Toluene-mg/L		0306927-01	0	0.1	0.104	104.0%	
Ethylbenzene-mg/L		0306927-01	0	0.1	0.109	109.0%	
p/m-Xylene-mg/L		0306927-01	0	0.2	0.221	110.5%	
o-Xylene-mg/L		0306927-01	0	0.1	0.106	106.0%	
MSD		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
WATER							
Benzene-mg/L		0306927-01	0	0.1	0.103	103.0%	2.0%
Toluene-mg/L		0306927-01	0	0.1	0.107	107.0%	2.8%
Ethylbenzene-mg/L		0306927-01	0	0.1	0.112	112.0%	2.7%
p/m-Xylene-mg/L		0306927-01	0	0.2	0.229	114.5%	3.6%
o-Xylene-mg/L		0306927-01	0	0.1	0.112	112.0%	5.5%
SRM		LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
WATER							
Benzene-mg/L		0006126-05		0.1	0.110	110.0%	
Toluene-mg/L		0006126-05		0.1	0.114	114.0%	
Ethylbenzene-mg/L		0006126-05		0.1	0.111	111.0%	
p/m-Xylene-mg/L		0006126-05		0.2	0.233	116.5%	
o-Xylene-mg/L		0006126-05		0.1	0.117	117.0%	

ENVIRONMENTAL LAB OF TEXAS

QUALITY CONTROL REPORT

Test Parameters

Order#: G0306916

BLANK	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0006108-01			<5.00		
MS	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0306916-01	266	500	762	99.2%	
MSD	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0306916-01	266	500	753	97.4%	1.2%
SRM	WATER	LAB-ID #	Sample Concentr.	Spike Concentr.	QC Test Result	Pct (%) Recovery	RPD
Chloride-mg/L		0006108-04		5000	4960	99.2%	

CHAIN OF CUSTODY

WWW.ANALYSYSINC.COM

Bill to (if different):

Send Reports To:

Company Name: Advanced Technology, Inc.

Address: 2750 E. 24th Ave.

City: Denver State: CO Zip: 80230

Phone: (303) 749-4993 Fax: (303) 397-4701

Company Name: Advanced Hess

Address: _____

City: _____ State: _____ Zip: _____

ATTN: _____

Phone: _____ Fax: _____

Each Sample must be conditioned with lab mgr.:

Prep. of Sample by: Cheryl Dykstra Analytical Sampler: Suzie Erik

3512 Montpelier Drive, Austin, TX 787-

Phone: (512) 685-5880 Fax: (512) 685-7-

2209 N. P.E.D., Ste N, Corpus Christi, TX 7-

Phone: (361) 289-6381 Fax: (361) 289-08-

Analyses Requested (1)

Please attach explanatory information as req

Client Sample No	Description/Identification	Date Sampled	Time Sampled	No. of Containers	Soil	Water	Waste	Lab I.D. #	Comments
01	MW-1	7-8-03	9:20	3		X			
02	MW-2	7-8-03	9:31	3		X			
03	MW-3	7-8-03	9:45	3		X			
04	MW-4	7-8-03	10:00	3		X		0306916	

Sample Relinquished By

Sample Received By

Name	Affiliation	Date	Time	Name	Affiliation	Date	Time
<u>[Signature]</u>	<u>ATC</u>	<u>7-8-03</u>	<u>12:15</u>	<u>[Signature]</u>	<u>ETC</u>	<u>7-8-03</u>	<u>12:15</u>
<u>[Signature]</u>	<u>ATC</u>	<u>7-8-03</u>	<u>14:26</u>	<u>[Signature]</u>	<u>ETC</u>	<u>7-8-03</u>	<u>14:26</u>

40ml Plastic 4.0°C

Indication of above described samples to AnalySys, Inc. for analytical testing constitutes agreement by Buyer/Sampler to AnalySys, Inc.'s standard terms.



NMGSAU Battery No 67

From: Bayliss, Randy
Sent: Thursday, June 13, 2002 2:59 PM
To: 'Small, Sam'
Subject: NMGSAU Battery No 67

We will consider in-situ or on site remediation.

As you've indicated, in-situ remediation will need some form of enhancement or application of technology for effective treatment. Use of chemical or organic fertilizers, passive aeration systems, and addition of catalysts have been approved and seen to work in similar projects.

Liners at the bottom of excavations are less effective and more expensive to install than caps over the top of backfilled material. Three feet of clean fill over the cap should be considered.

If you want to stick with the OCD guidelines and 100 ppm TPH and in-situ remediation, please provide a rough estimate of how long it'll take to achieve the cleanup level. I understand this is a rough estimate, and might be best described in general terms, like "more than five and less than ten years."

If you want to propose alternate cleanup levels, please provide a rational basis for those levels using some sort of scientific approach or model.

Sampling "ground water" from excavations is not a preferred method, since exposure and aeration will allow for escape of volatile compounds. Exposed water in pits is also vulnerable to contamination from oily soils sloughing off of sidewalls and from leaks from equipment. Nevertheless, we'd like to see your sample results.

We'd also like to see ground water monitoring from properly installed and developed wells located so as to define the extent of contamination around the source of the release site.

I appreciate that you have been cleaning up old pits sites on a regular maintenance schedule. However, this is an incident where the release may endanger the environment (because of the closeness to ground water) or there is a reasonable probability the release could be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). Therefore, if no ground water contamination is found, we can proceed along the lines of a Rule 116 D CORRECTIVE ACTION. So, OCD will require that you submit a work plan detailing your methods of remediation and monitor well locations.

If you have time next week when you're in town for the chlorides working group meeting, we could get together and discuss this further. I think it's important to go through the review-and-approval process for this type of corrective action, especially when there might be due diligence issues or third-party disputes.

After we meet, I'll be preparing a more official letter outlining the work plan requirements.

-----Original Message-----

From: Small, Sam [mailto:SSmall@Hess.com]
Sent: Wednesday, June 05, 2002 9:18 AM
To: 'Bayliss, Randy'
Cc: Baker, Jay; Kritter, Kurt
Subject: RE: NMGSAU Battery No 67

I am not sure where we are going with this. We had originally planned to line the bottom of the excavation with 2-3 feet of compacted clay and back fill with the material on site, remediated to 1500 ppm TPH or less, pursuant to approval by the OCD. Samples from the spoils pile were analyzed; TPH concentrations were between 1000 and 1100 ppm TPH. We then received a letter from OCD rescinding the approval of the 1500 ppm threshold and indicating that we would have to use backfill which conformed to the 100 ppm TPH guideline. The landowner wants the spoils pile hauled off and 'clean' soil (purchased from him) hauled in, but AHC does not wish to do so. We are currently considering remediation on site. Again, the landowner does not want us to use any of the site for landspreading, so we are reviewing methods for enhancing the remediation process in the spoil pile. The ground water sampled at the excavation and in the monitor wells did not evidence any hydrocarbon contamination. We will continue to monitor the spoil pile for decreases in TPH concentrations, however, until we settle on the remediation technology we are going to employ, I am not too sure what additional sampling has to offer.

-----Original Message-----

From: Bayliss, Randy [mailto:RBayliss@state.nm.us]
Sent: Wednesday, June 05, 2002 8:53 AM
To: Samuel Small (E-mail)
Subject: NMGSAU Battery No 67

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

May 28, 2002

Bill Olson
NMOCD
P.O. Box 6429
Santa Fe, NM 87504-6429

Re: 1831 Mobile Road, Hobbs

Dear Mr. Olson,

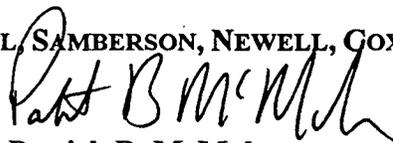
I have been in contact with Mr. Gary Johnson, owner of 1831 Mobile Road. Mr. Johnson informs me that you are making arrangements to conduct a sampling event at this Mobile Road property. Please advise me of your sampling date so that I may arrange to split sample on behalf of Mr. Johnson.

I look forward to discussing this matter with you.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

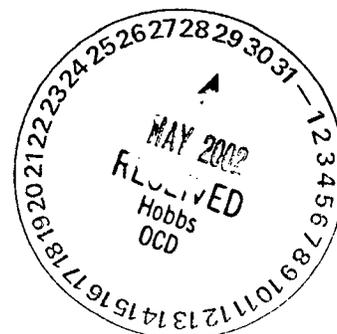
By:



Patrick B. McMahon

PBM:dr

cc: Gary Johnson
✓Chris Williams, Hobbs OCD



LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

May 28, 2002

Chris Williams
NMOCD
1625 N. French Dr.
Hobbs, NM 88240

**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Williams,

Thank you for taking time on May 23, 2002, to meet with Mr. Ed Johnston and myself. As we discussed, Mr. Johnston is concerned that Amerada Hess has not properly remediated the former tank battery site located on his land. As you requested, I have provided your office with a copy of the lab results from our January 2002 sampling event. In addition, I have attached correspondence to Mr. Randy Bayliss, of the Santa Fe OCD office, regarding your identification of him as the OCD representative that will be handling this matter.

I look forward to receiving your summary of the activity that has taken place since Mr. Sheeley's December 20, 2001 letter to Amerada Hess. If you have any questions, please do not hesitate to call.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick B. McMahon



PBM:cd

Enclosure

pc: Ed Johnston
Randy Bayliss



LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

May 28, 2002

~~Randy Bayliss
NMOCD
P.O. Box 6429
Santa Fe, NM 87505~~

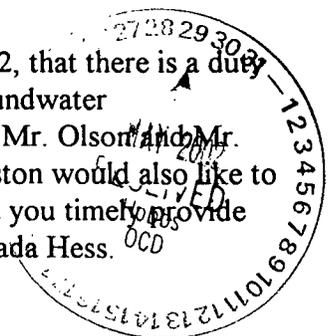
**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Bayliss,

On Thursday, May 23, 2002, Mr. Ed Johnston and myself met with Chris Williams and Gary Wink, of the Hobbs OCD office, regarding the above referenced battery location. Mr. Williams informed me that you are the OCD representative that will be handling this matter. Unless you contact me otherwise, it will be my understanding that you are, in fact, the OCD representative.

As you and I have already discussed, Mr. Johnston is very interested in seeing that Amerada Hess properly remediates the former battery site located on his fee land. To this end, I am requesting that you copy my office all correspondence that is generated by the OCD, and by Amerada Hess. In addition, I am requesting that you timely inform us of all developments and seek Mr. Johnston's input before any decision is made regarding the investigation and remediation of this site.

It is our position, based upon the lab results obtained in January 2002, that there is a duty for Amerada Hess to undertake further investigation as to the extent of groundwater contamination at the site. Copies of these lab results have been provided to Mr. Olson and Mr. Williams and have been enclosed with this letter for your review. Mr. Johnston would also like to participate in any and all future sampling events at this site and requests that you timely provide him with notice of any sampling events scheduled by the OCD and/or Amerada Hess.



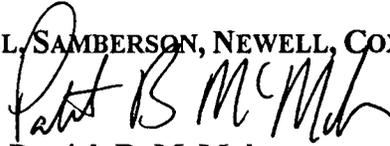
Amerada Hess encountered groundwater during the remediation of this battery site on October 5, 2001. Since then, an oily sheen has been visible on the water in the bottom of the pit. Nearly eight months have passed and this problem has not been adequately addressed by Amerada Hess or the OCD. To date, Mr. Johnston has been very patient with Amerada Hess and the OCD. However, he has asked me to identify all options that are available to him that can be used to insure that this matter is resolved.

I look forward to working with you on this matter.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:


Patrick B. McMahon

PBM:cd

pc: ~~Ed Johnson~~
✓Chris Williams



LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

January 24, 2002

Bill Olson
P. O. Box 6429
Santa Fe NM 87504-6429

**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Olson,

As per our conversation on January 23, 2002, please find enclosed copies of correspondence sent to the Hobbs OCD by Amerada and my correspondence to Mr. Paul Sheeley regarding the above referenced matter. As of this date Amerada has continued to refuse to submit a copy of all their sample to results to Mr. Johnston. In addition, the Hobbs OCD office has not responded to my December 4, 2001 letter. As I have set forth in the enclosed letter, Mr. Johnston is interested in having Amerada properly remediate this property. However, the longer Mr. Johnston waits for a copy of the sample results from Amerada the more frustrated he becomes. Mr. Sheeley's utter refusal to address the legitimate concerns of my client has only made matters worse.

The only word Mr. Johnston has received from Amerada has been their repeated request to cover the water in the bottom of the pit with topsoil in order to protect the well being of children who happen to find themselves out in the middle of my client's cow pasture. Mr. Johnston has instructed Amerada not to cover the bottom of the pit. I have suggested that if Amerada was interested in the safety of those children, which my client has never seen, they would install a chainlink fence around the pit instead of trying to cover-up their water problem. As of this date, the pit remains unfenced.

Also, enclosed are black and white copies of color photographs identifying the groundwater at the bottom of the pit and the sheen on the water surface and the water sample

Letter to Bill Olson
NMOCD
January 24, 2002
Page two.

results from Cardinal Laboratories. These results confirm that there is a very serious contamination problem with the water under Mr. Johnston's property. I can tell you that immersing your hand into the water at the bottom of the pit results in a heavy, oily film on your skin.

As of this date, these are the facts relating to this problem:

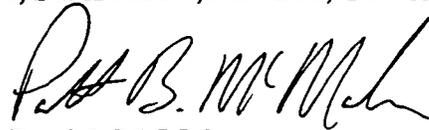
Amerada has hit groundwater in their excavation of an old Amerada tank battery. The groundwater is contaminated. Amerada has refused to discuss this matter with my client. Amerada has no plans to remediate groundwater at the site. Amerada's solution is to cover up their problem with red-bed clay. The OCD has been notified of this problem. The OCD refuses to discuss this matter with my client. The OCD has not forced Amerada to address the groundwater issue. The OCD is apparently satisfied with Amerada's plan to cover-up contaminated groundwater.

The Oil Conservation Division, through the Oil and Gas Act (N.M.S.A. §70-2-1 through 70-2-38 [1995 Repl. Pamph.]), is statutorily charged with prevention of waste and the protection of public health and the environment. My client and I are available the week of January 28, 2002 and would like to visit with you on site. I look forward to hearing from you.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick McMahon

PBM.dr
Enclosure
pc w/encl: Ed Johnston



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

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1415	Date 2/4/02
---	-----------------------------------	-----------	-------------

<u>Originating Party</u>	<u>Other Parties</u>
Bill Olson - Energy Bureau	Pat McMahon - Heibel, Samberson, Navell, Cox & McMahon

Subject (565) 396-5303

Helge, Blas Well and
 Amerada Hess - NMBSTU Battery #67

Discussion

Told him had contacted Ms. Blas. No organics detected in water.
 OED still awaiting metals and gen chem results

Don't know status of Amerada Hess case. Need to contact
 Hobbs. No water wells in vicinity of the site (per McMahon)

Conclusions or Agreements

- OED will send Ms. Blas explanation of results when all have been received
- I will contact Hobbs to determine status of Amerada Hess case

Distribution Signed *Bill Olson*

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

January 24, 2002

RECEIVED

JAN 29 2002

Bill Olson
P. O. Box 6429
Santa Fe NM 87504-6429

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Olson,

As per our conversation on January 23, 2002, please find enclosed copies of correspondence sent to the Hobbs OCD by Amerada and my correspondence to Mr. Paul Sheeley regarding the above referenced matter. As of this date Amerada has continued to refuse to submit a copy of all their sample to results to Mr. Johnston. In addition, the Hobbs OCD office has not responded to my December 4, 2001 letter. As I have set forth in the enclosed letter, Mr. Johnston is interested in having Amerada properly remediate this property. However, the longer Mr. Johnston waits for a copy of the sample results from Amerada the more frustrated he becomes. Mr. Sheeley's utter refusal to address the legitimate concerns of my client has only made matters worse.

The only word Mr. Johnston has received from Amerada has been their repeated request to cover the water in the bottom of the pit with topsoil in order to protect the well being of children who happen to find themselves out in the middle of my client's cow pasture. Mr. Johnston has instructed Amerada not to cover the bottom of the pit. I have suggested that if Amerada was interested in the safety of those children, which my client has never seen, they would install a chainlink fence around the pit instead of trying to cover-up their water problem. As of this date, the pit remains unfenced.

Also, enclosed are black and white copies of color photographs identifying the groundwater at the bottom of the pit and the sheen on the water surface and the water sample

Letter to Bill Olson
NMOCD
January 24, 2002
Page two.

results from Cardinal Laboratories. These results confirm that there is a very serious contamination problem with the water under Mr. Johnston's property. I can tell you that immersing your hand into the water at the bottom of the pit results in a heavy, oily film on your skin.

As of this date, these are the facts relating to this problem:

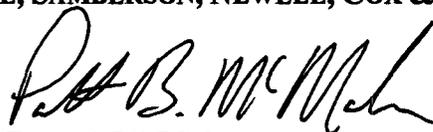
Amerada has hit groundwater in their excavation of an old Amerada tank battery. The groundwater is contaminated. Amerada has refused to discuss this matter with my client. Amerada has no plans to remediate groundwater at the site. Amerada's solution is to cover up their problem with red-bed clay. The OCD has been notified of this problem. The OCD refuses to discuss this matter with my client. The OCD has not forced Amerada to address the groundwater issue. The OCD is apparently satisfied with Amerada's plan to cover-up contaminated groundwater.

The Oil Conservation Division, through the Oil and Gas Act (N.M.S.A. §70-2-1 through 70-2-38 [1995 Repl. Pamph.]), is statutorily charged with prevention of waste and the protection of public health and the environment. My client and I are available the week of January 28, 2002 and would like to visit with you on site. I look forward to hearing from you.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:



Patrick McMahon

PBM:dr
Enclosure
pc w/encl: Ed Johnston

Bayliss, Randy

From: Small, Sam [SSmall@Hess.com]
Sent: Wednesday, June 05, 2002 9:18 AM
To: 'Bayliss, Randy'
Cc: Baker, Jay; Kritter, Kurt
Subject: RE: NMGSAU Battery No 67

I am not sure where we are going with this. We had originally planned to line the bottom of the excavation with 2-3 feet of compacted clay and back fill with the material on site, remediated to 1500 ppm TPH or less, pursuant to approval by the OCD. Samples from the spoils pile were analyzed; TPH concentrations were between 1000 and 1100 ppm TPH. We then received a letter from OCD rescinding the approval of the 1500 ppm threshold and indicating that we would have to use backfill which conformed to the 100 ppm TPH guideline. The landowner wants the spoils pile hauled off and 'clean' soil (purchased from him) hauled in, but AHC does not wish to do so. We are currently considering remediation on site. Again, the landowner does not want us to use any of the site for landspreading, so we are reviewing methods for enhancing the remediation process in the spoil pile. The ground water sampled at the excavation and in the monitor wells did not evidence any hydrocarbon contamination. We will continue to monitor the spoil pile for decreases in TPH concentrations, however, until we settle on the remediation technology we are going to employ, I am not too sure what additional sampling has to offer.

-----Original Message-----

From: Bayliss, Randy [mailto:RBayliss@state.nm.us]
Sent: Wednesday, June 05, 2002 8:53 AM
To: Samuel Small (E-mail)
Subject: NMGSAU Battery No 67

The Hobbs district office has asked me to handle this project. It's looks like some more sampling might be in order. What are you thoughts?

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

February 6, 2002

Bill Olson
NMOCD
P.O. Box 6429
Santa Fe, NM 87504-6429

Re: Groundwater Standards for TPH

Dear Mr. Olson,

As per our conversation on February 4, 2002, I am writing this letter to you to confirm matters we discussed. It is my understanding that the Oil Conservation Division has taken the following position regarding Total Petroleum Hydrocarbon (TPH) in groundwater:

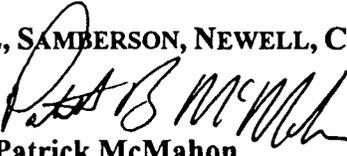
1. The New Mexico Groundwater Standards do not include a standard for TPH.
2. There are no New Mexico statutes, rules and/or regulations that set forth a groundwater standard for TPH.
3. Since there are no New Mexico groundwater standards for TPH, groundwater that contains TPH is not contaminated by that TPH.
4. Therefore, the OCD will be taking no action regarding groundwater that contains TPH.

If the foregoing is incorrect, please contact me within ten (10) days of the date of this letter in writing setting forth the OCD's position on this subject. Otherwise, it will be my understanding that the OCD's positing on TPH in groundwater is, and will continue to be, as set forth above.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:


Patrick McMahon

PBM:dr

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

RECEIVED

May 28, 2002

MAY 30 2002

Environmental Bureau
Oil Conservation Division

Chris Williams
NMOCB
1625 N. French Dr.
Hobbs, NM 88240

**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Williams,

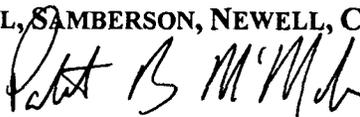
Thank you for taking time on May 23, 2002, to meet with Mr. Ed Johnston and myself. As we discussed, Mr. Johnston is concerned that Amerada Hess has not properly remediated the former tank battery site located on his land. As you requested, I have provided your office with a copy of the lab results from our January 2002 sampling event. In addition, I have attached correspondence to Mr. Randy Bayliss, of the Santa Fe OCD office, regarding your identification of him as the OCD representative that will be handling this matter.

I look forward to receiving your summary of the activity that has taken place since Mr. Sheeley's December 20, 2001 letter to Amerada Hess. If you have any questions, please do not hesitate to call.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick B. McMahon

PBM:cd

Enclosure

pc: ~~Ed Johnston~~
✓Randy Bayliss

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

RECEIVED

MAY 30 2002

Environmental Bureau
Oil Conservation Division

May 28, 2002

Randy Bayliss
NMOCD
P.O. Box 6429
Santa Fe, NM 87505

**Re: Amerada Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Section 32, Township 19 South, Range 37 East, N.M.P.M.
Lea County, New Mexico**

Dear Mr. Bayliss,

On Thursday, May 23, 2002, Mr. Ed Johnston and myself met with Chris Williams and Gary Wink, of the Hobbs OCD office, regarding the above referenced battery location. Mr. Williams informed me that you are the OCD representative that will be handling this matter. Unless you contact me otherwise, it will be my understanding that you are, in fact, the OCD representative.

As you and I have already discussed, Mr. Johnston is very interested in seeing that Amerada Hess properly remediates the former battery site located on his fee land. To this end, I am requesting that you copy my office all correspondence that is generated by the OCD, and by Amerada Hess. In addition, I am requesting that you timely inform us of all developments and seek Mr. Johnston's input before any decision is made regarding the investigation and remediation of this site.

It is our position, based upon the lab results obtained in January 2002, that there is a duty for Amerada Hess to undertake further investigation as to the extent of groundwater contamination at the site. Copies of these lab results have been provided to Mr. Olson and Mr. Williams and have been enclosed with this letter for your review. Mr. Johnston would also like to participate in any and all future sampling events at this site and requests that you timely provide him with notice of any sampling events scheduled by the OCD and/or Amerada Hess.

Amerada Hess encountered groundwater during the remediation of this battery site on October 5, 2001. Since then, an oily sheen has been visible on the water in the bottom of the pit. Nearly eight months have passed and this problem has not been adequately addressed by Amerada Hess or the OCD. To date, Mr. Johnston has been very patient with Amerada Hess and the OCD. However, he has asked me to identify all options that are available to him that can be used to insure that this matter is resolved.

I look forward to working with you on this matter.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick B. McMahon

PBM:cd

pc: Ed Johnson
Chris Williams

TABLE 1

GROUND WATER CHEMISTRY
HISTORICAL TABLE

EOTT ENERGY CORPORATION
RED BYRD NO. 2
LEA COUNTY, NEW MEXICO
ETGI PROJECT # EOT 2051C

All concentrations are in mg/L

SAMPLE LOCATION	SAMPLE DATE	SW 846-8260b			
		BENZENE	TOLUENE	ETHYL-BENZENE	TOTAL XYLENES
Excavation	10/29/01	0.246	0.452	0.147	0.428

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

March 13, 2002

RECEIVED

MAR 21 2002

Environmental Bureau
Oil Conservation Division

State of New Mexico
Oil Conservation Division
Environmental Division
Randy Bayliss
1220 South St. Francis Dr.
Santa Fe, NM 87505

**Re: Amerada Hess Abandoned Battery Site Remediation March 13, 2002
NMGSAU Battery No. 67
Unit O, Section 32, Township 19 South, Range 37 East,
NMPM, Lea County, New Mexico**

Dear Mr. Bayliss,

This firm represents Mr. Ed Johnston in regard to the above referenced remediation. Mr. Johnston is the fee owner of the surface estate affected by this activity.

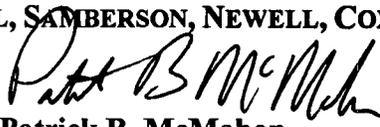
According to Mr. William Olson, you are the OCD employee responsible for overseeing remediation efforts by Amerada Hess in and around Monument, New Mexico. Enclosed for your review is correspondence regarding my efforts on behalf of Mr. Johnston.

Please contact me at your earliest convenience so that we may discuss if, how and when Amerada Hess will be completing this remediation project. Likewise, we look forward to meeting with you on site if possible.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick B. McMahon

PBM:dr
Enclosures
cc: Ed Johnston

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. McMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

March 28, 2002

Chris Williams
NMOCB
1625 N. French Dr.
Hobbs, NM 88240

RECEIVED
APR 02 2002
Environmental Bureau
Oil Conservation Division

**Re: Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit 0, Sec. 32, T-19S, R-37E**

Dear Mr. Williams,

On March 22, 2002, I had a conversation with Mr. Bayliss, Sante Fe OCD, regarding the above referenced matter. Mr. Bayliss faxed to me a number of pages of correspondence between Amerada and Mr. Sheeley. Enclosed for your review are three of the pages I received from Mr. Bayliss, namely an October 30, 2001 letter to Mr. Small, a November 30, 2001 letter to Mr. Sheeley and a December 3, 2001 letter to Mr. Small. According to Mr. Bayliss, contrary to the December 3, 2001 letter by Mr. Sheeley, Amerada's proposed closure plan of November 30, 2001 is not the closure plan that Amerada will use at the above referenced site. According to Mr. Bayliss, the November 30, 2001 closure plan has been rejected by OCD since Mr. Sheeley's December 3, 2001 letter. According to Mr. Bayliss, Mr. Small has agreed to reduce TPH levels in the backfill material to 100 ppm. If Mr. Bayliss is mistaken, or if I misunderstood, please contact me immediately.

As I have indicated in correspondence to Mr. Sheeley, Mr. Johnston is concerned that the above reference site is remediated properly. As of this date, none of the closure proposals from Amerada comply with the OCD Guidelines. In addition, I am unaware that either Amerada or the OCD has made any effort to address groundwater issues at the excavation site.

Mr. Johnston and I would like the opportunity to meet with you to discuss our concerns. Please feel free to call me to discuss this matter.

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 5, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N French Drive
Hobbs, New Mexico 88240-1981

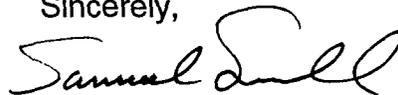
RE: **Abandoned Battery Site Remediation**
NMGSAU Batt. 67 (May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5th. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: NMOCD – Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 25, 2001

Delivered by Hand 10/26/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

A handwritten signature in black ink that reads "Samuel Small". The signature is written in a cursive style with a large, prominent 'S' at the beginning.

Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

↑ N

CHEVRON MRY LOVE

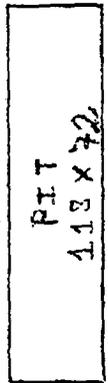
MW-1 DTW: 28.2φ

98'

Approx. 29 feet deepest point

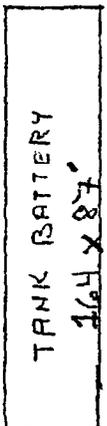
Approx. 30 feet deepest point

Approx. deep



PIT
113 x 72

149'

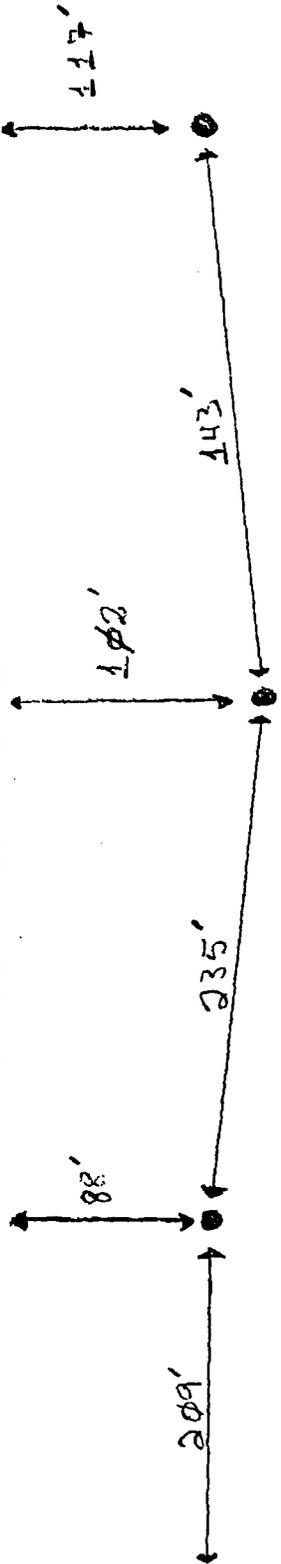


TANK BATTERY
164 x 87

18'

135'

CALICHE ROAD



MW-4

DTW: 27.8φ

MW-2

DTW: 27.57

MW-3

DTW: 31.76

DTW - NOT corrected for elevation

NOT TO SCALE
KEN DUTTON - ETGI

**NMGSAU BATTERY NO. 67
ANALYTICAL RESULTS
(PPM)**

SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1	Groundwater from							
2	West Excavation	< 0.001	< 0.001	< 0.001	< 10	< 10	284	1158
3	Monitor Well #1	< 0.001	< 0.001	< 0.001	< 10	< 10	266	
4	Monitor Well #2	< 0.001	< 0.001	< 0.001	< 10	< 10	248	
5	Monitor Well #3	< 0.001	< 0.001	< 0.001	< 10	< 10	213	
6	Monitor Well #4	< 0.001	< 0.001	< 0.001	< 10	< 10	301	
7	Vadose Zone MW #1				< 10	< 10	18	
8	Samole at 30'				< 10	< 10	24	
9	Vadose Zone MW #2				< 10	< 10	18	
10	Sample at 30'				< 10	< 10	24	
11	Vadose Zone MW #3				< 10	< 10	18	
12	Sample at 25'				< 10	< 10	24	
13	Vadose Zone MW #4				< 10	< 10	24	
14	Sample at 25'				< 10	< 10	24	
15	Bottom of East							
16	Excavation	< 0.025	< 0.025	< 0.025	< 10	24	51	
17	Bottom of West							
18	Excavation	< 0.025	< 0.025	0.033	< 50	1190	66	

October 30, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is **hereby approved** under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

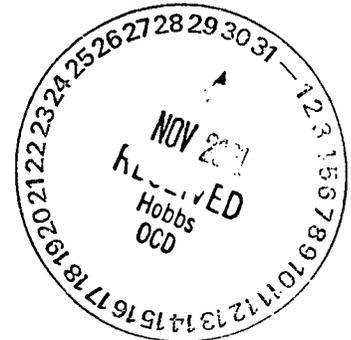
P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

November 30, 2001

HAND DELIVRED 11/30/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

12- 4-01: 3:58PM; MONUMENT
Dec 04 01 01:59p
Dec 04 01 03:19p

: 505 393 1927

27 5
p. 6

p. 5

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: CAMILLE REYNOLDS
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-1701

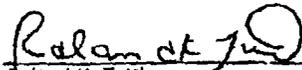
Sample Type: Soil
Sample Condition: Intact/ Iced/ -0.5 deg C
Project Name: AHC Chevron May Love
Project #: AHC 1205R
Project Location: Monument, NM

Sampling Date: 11/28/01
Receiving Date: 11/30/01
Analysis Date: 11/29/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-02	East Pit Backfill 5-10'	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-03	Former Tank Batt. NW Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.090	0.089	0.093	0.192	0.089
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	90	89	93	96	89
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	0.061	0.257	0.418	0.143
SPIKE	0.089	0.090	0.101	0.198	0.097
SPIKE DUP	0.090	0.095	0.110	0.220	0.106
%EA	90	93	100	102	100
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1.12	5.52	9.42	12.5	9.42

METHODS: EPA SW 846-8021B ,5030


Ralanda K. Tuttle

12-04-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 2

12- 4-01: 3:58PM; MONUMENT
DEC 04 01 03:19p

p.6

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: CAMILLE REYNOLDS
2540 WEST MARLAND
HOBBBS, NM 88240
FAX: 505-397-4701

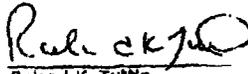
Sample Type: Soil
Sample Condition: Intact/ Iced/ -0.5 deg C
Project Name: AHC Chevron May Love
Project #: AHC 1205R
Project Location: Monument, NM

Sampling Date: 11/28/01
Receiving Date: 11/30/01
Analysis Date: 12/02/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<10	41
0102098-02	East Pit Backfill 5-10'	<10	202
0102098-03	Former Tank Batt. NW Sidewall	<10	142

QUALITY CONTROL	483	586
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	97	117
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	499	638
SPIKE DUP	503	634
% EXTRACTION ACCURACY	106	123
BLANK	<10	<10
RPD	0.80	0.63

Methods: SW 846-8015M


Roland K. Tuttle

12-04-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

DEC-04-01 TUE 04:15 PM FROM:

TO:

12- 4-01; 3:58PM; MONUMENT
Dec 04 01 02:00p

:505 393 1927

4/ 5
p. 8

Dec 04 01 03:19p

p. 7

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: CAMILLE REYNOLDS
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

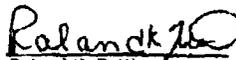
Sample Type: Soil
Sample Condition: Intact/ Iced/ -0.5 deg C
Project Name: AHC Chevron May Love
Project #: AHC 1205R
Project Location: Monument, NM

Sampling Date: 11/28/01
Receiving Date: 11/30/01
Analysis Date: 12/03/01

ELT#	FIELD CODE	Chloride mg/kg
0102098-01	Former Tank Batt. Pit Bottom	66
0102098-02	East Pit Backfill 5-10'	18
0102098-03	Former Tank Batt. NW Sidewall	75

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	18
SPIKE	523
SPIKE DUP	523
% EXTRACTION ACCURACY	101
BLANK	<10
RPD	0.0

Methods: SW 846-8015M


Roland K. Tuttle

12-04-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1719

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 4

December 3, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The revised closure proposal referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation dated November 30, 2001 is **hereby approved**.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please feel free to write or call me at (505) 393-6161, x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. MCMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NEW MEXICO 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

TELECOPY TRANSMITTAL SHEET

CONFIDENTIALITY NOTE

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED BELOW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPY OF THIS TELECOPY IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TELECOPY IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS SET FORTH ABOVE VIA THE UNITED STATES POSTAL SERVICE.

DATE: 12-4-01 TIME: 4:50pm
TO: Paul Scheeley # 393-0720
You Wrotenberly # 476-3462
* Chris Williams # 393-0720
RE: Amerada - Hess / Ed Johnston

YOU SHOULD RECEIVE PAGE(S) OF COPY, INCLUDING THIS COVER PAGE. PLEASE NOTIFY US IMMEDIATELY AT (505) 396-5303 IF NOT RECEIVED PROPERLY.

- FOR YOUR INFORMATION/RECORDS
- AS WAS DISCUSSED
- FOR YOUR REVIEW
- PER YOUR REQUEST
- FOR YOUR COMMENTS
- PLEASE CALL ME ABOUT THIS

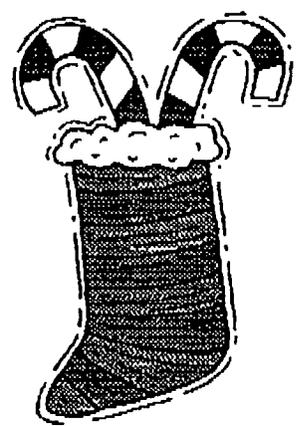
If you have any questions, please do not hesitate to call.

IF CHECKED ORIGINAL WILL BE FORWARDED TO YOU BY:
 FEDERAL EXPRESS REGULAR MAIL

THANK YOU,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By: Cheryl



476-3462

*LAW OFFICES***HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. MCMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

December 4, 2001

Paul Scheeley
NMOCD
1625 N. French Drive
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit O, Section 32, Township 19 South, Range 37 East,
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.

Letter to Paul Scheeley
NMOCD
December 4, 2001
Page two.

lawsuits

Your response to Mr. Johnston's concerns was that you do not get involved ⁱⁿ between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

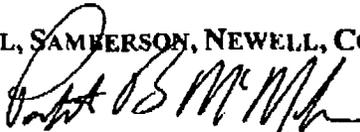
Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:


Patrick B. McMahon

PBM:cd

pc: Ed Johnston
Lori Wrotenbery
Chris Williams

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

November 9, 2001

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0003 1887 7919**

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Incidents and Releases-Pipeline Leak**
UL-K-Sec8, T-19S, R-35E
T. Anderson Lease
Lea County, New Mexico
Status Report



Dear Mr. Sheeley:

This letter will confirm my voice mail message left on November 8, 2001 advising the NMOCD that excavation activities at the subject site had encountered groundwater. The depth of excavation is approximately 30 feet. Vadose zone and groundwater samples were collected and submitted for analysis. Analytical results will be provided to the NMOCD when they are available.

Pursuant to our letter of October 2, 2001, monitor wells were drilled at the site on October 10, 2001. A plat of the well locations and groundwater analyses are attached.

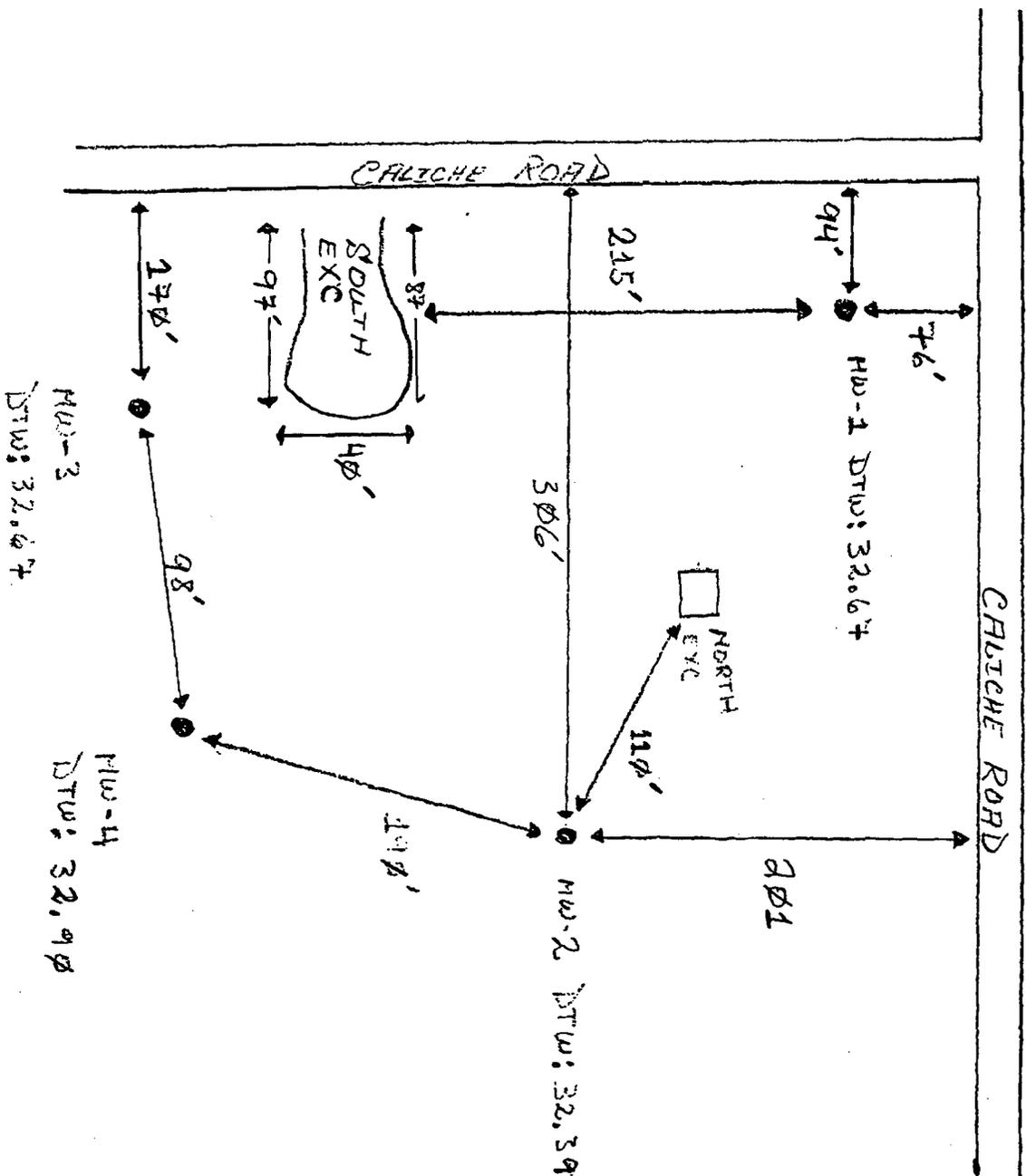
If you have any questions, please contact Mr. Rob Williams at 1-505-393-2144, ext. 103.

Sincerely,

Samuel Small, PE
Environmental Coordinator

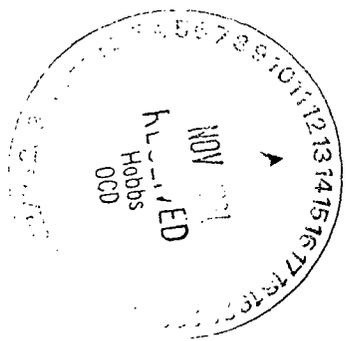
Xc: Houston Environmental Files
PBBU Environmental Files
Monument Files

↑ N



CALICHE ROAD

T. ANDERSON



NOT TO SCALE
K. DUTTON - ETGI

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

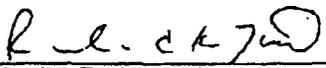
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ -1.0 deg C
Project Name: T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 10/17/01
Receiving Date: 10/17/01
Analysis Date: 10/19/01

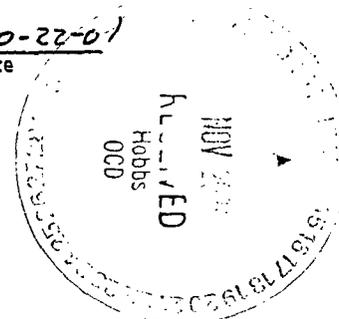
ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101790-01	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-02	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-03	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-04	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001

QUALITY CONTROL	0.102	0.104	0.112	0.226	0.094
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	102	104	112	113	94
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	<0.001	<0.001	<0.001	<0.001
SPIKE	0.094	0.093	0.085	0.171	0.085
SPIKE DUP	0.092	0.091	0.088	0.177	0.087
%EA	94	93	85	86	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	2.15	2.17	3.47	2.30	2.32

METHODS: EPA SW 846-8021B, 5030


Ralend K. Tuttle

10-22-01
Date



ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

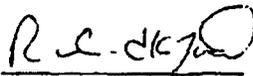
Sample Type: Water
Sample Condition: Intact/ Iced/ -1.0 deg C
Project Name: T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

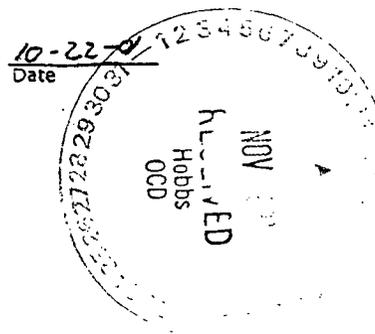
Sampling Date: 10/17/01
Receiving Date: 10/17/01
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/L
0101790-01	MW 1	532
0101790-02	MW 2	443
0101790-03	MW 3	549
0101790-04	MW 4	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	266
SPIKE	762
SPIKE DUP	771
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.17

Methods: SW 846-9253


Reiland K. Tuttle



ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

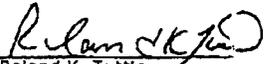
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3.0 deg C
Project Name: AHC T. Anderson
Project #: AMC 1203R
Project Location: Monument, NM

Sampling Date: See Below
Receiving Date: 10/18/01
Analysis Date: 10/18/01

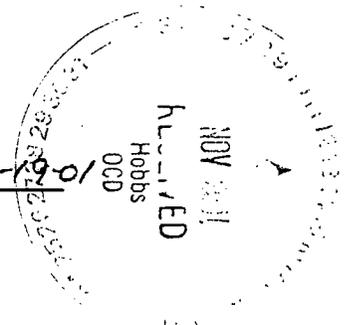
ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRG >C10-C28 mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	<10	28	10/11/01
0101798-02	MW-2 25'	<10	12	10/11/01
0101798-03	MW-3 25'	<10	16	10/12/01
0101798-04	MW-4 25'	<10	<10	10/12/01

QUALITY CONTROL	531	454
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	106	91
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	72	981
SPIKE	620	1530
SPIKE DUP	561	1370
% EXTRACTION ACCURACY	115	115
BLANK	<10	<10
RPD	9.99	11.0

Methods: SW 846-8015M


Roland K. Tuttle

10-19-01
Date



ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-357-4701

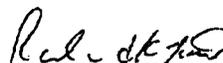
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1203R
Project Location: Monument, NM

Sampling Date: See Below
Receiving Date: 10/18/01
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	133	10/11/01
0101798-02	MW-2 25'	222	10/11/01
0101798-03	MW-3 25'	83	10/12/01
0101798-04	MW-4 25'	62	10/12/01

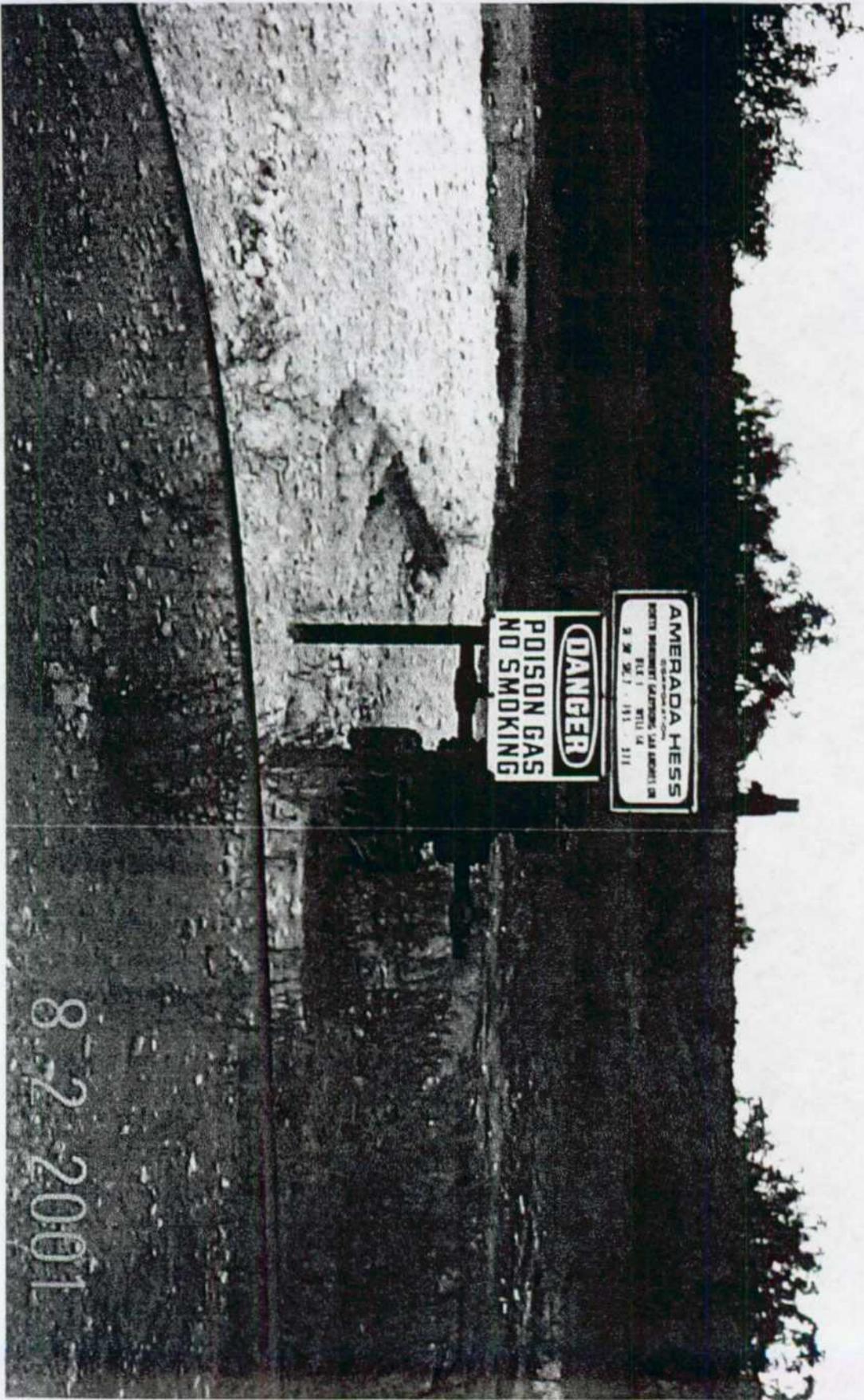
QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	89
SPIKE	709
SPIKE DUP	720
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	1.54

Methods: SW 846-9253


Roland K. Tuttle

10-19-01
Date

ACCEPTED
Hobbs
OCD



AMERADA HESS
NORTH BAYVIEW (ALPINE) GAS EXPANSION
ELECTRICITY
S. 200 201 - 191 - 211

DANGER
POISON GAS
NO SMOKING

8-2-2001

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

August 21, 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0003 1887 7869

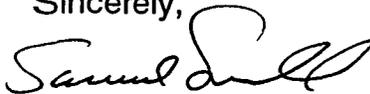
Mr. Roger C. Anderson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: **Groundwater Abatement Plan (AP-19)**
NMGSAU Battery 94
Lea County, New Mexico

Dear Mr. Anderson:

Pursuant to your letter of July 5, 2001, enclosed find the Lovington Leader affidavit of publishing of the notification of the Stage 1 abatement proposal for the subject plan. If you have any questions, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: OCD – District 1
Houston Environmental File
PBBU Environmental File
Monument File

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 2, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

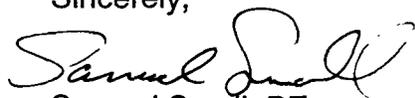
RE: **Incidents and Releases - Pipeline Leak**
UL-K-Sec. 8, T-19S, R-35E
T. Anderson Lease
Lea County, New Mexico
Status Report

Dear Mr. Sheeley:

Prior to any further excavation or backfill activities at the spill sites located on the subject lease, Amerada Hess Corporation plans to drill monitor wells to determine what impacts, if any, the spills had on the groundwater beneath the sites. A hydraulic gradient will also be determined across the sites. The wells will be drilled and completed in accordance with OCD recommended practices. The groundwater will be analyzed for chloride, TDS and BTEX concentrations. Samples of the 'soil' obtained while drilling the wells will be analyzed for chloride, TPH and BTEX concentrations.

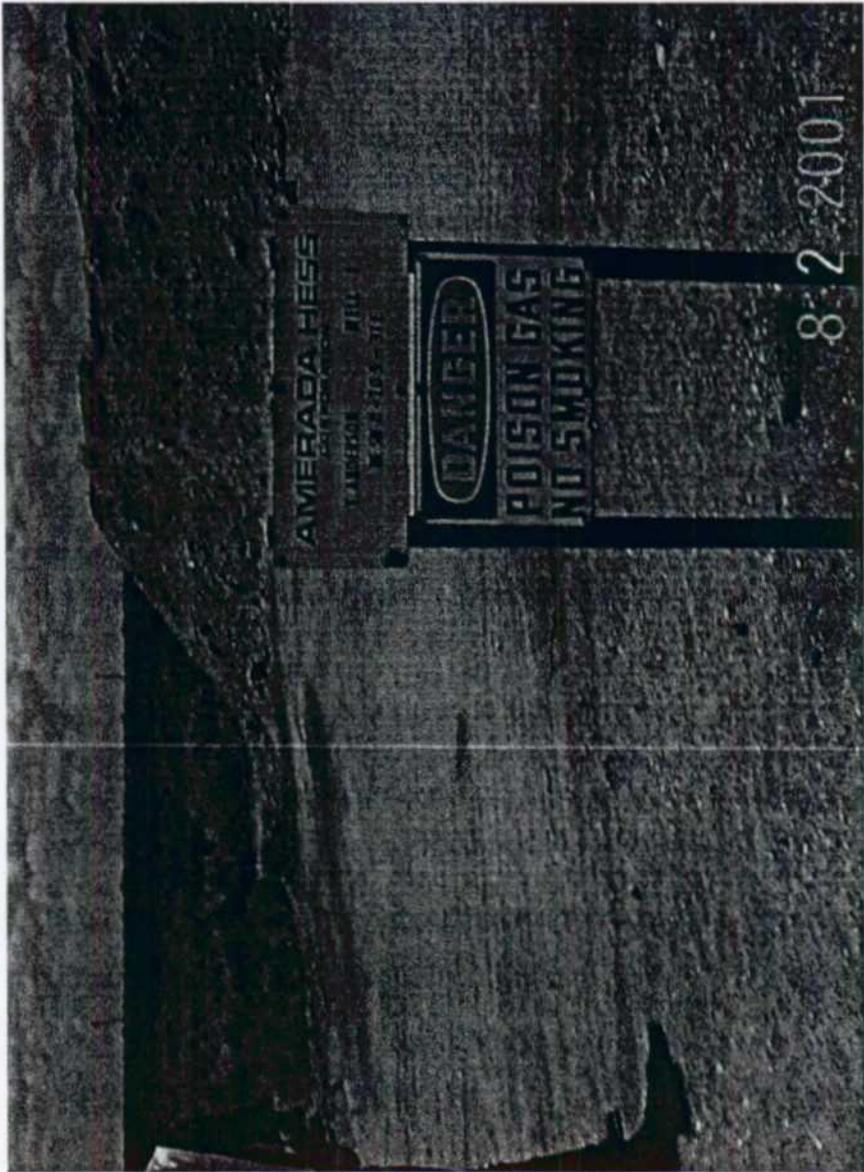
If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

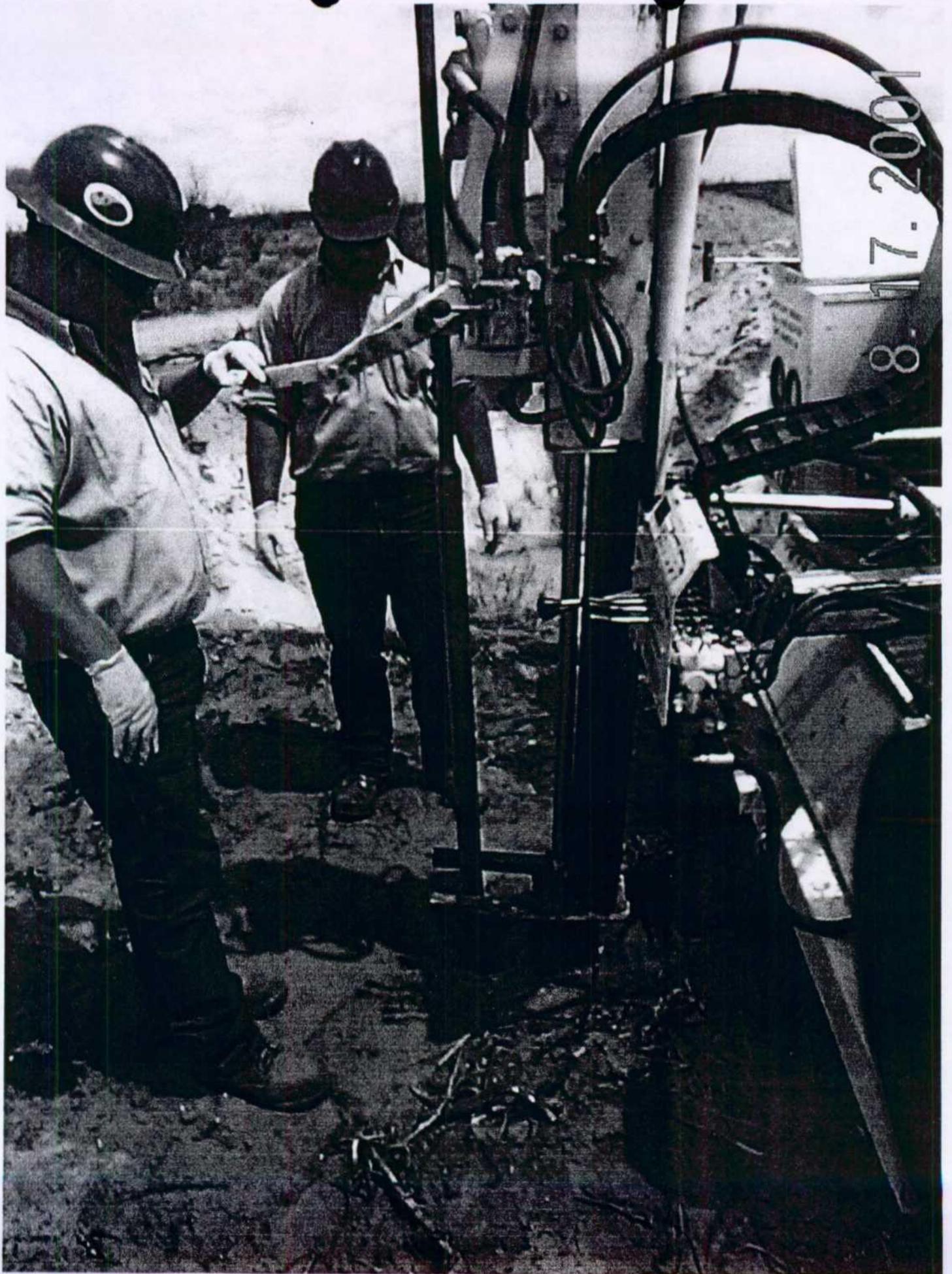
Sincerely,

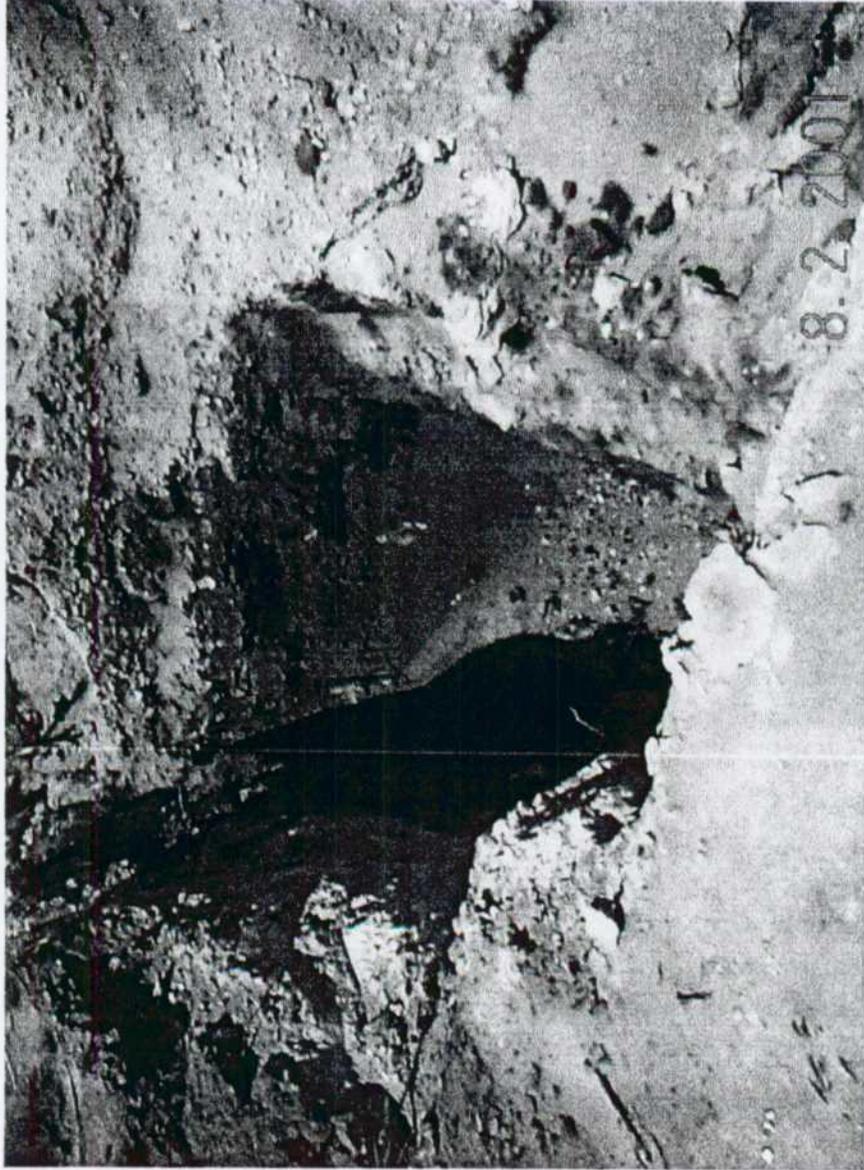


Samuel Small, PE
Environmental Coordinator

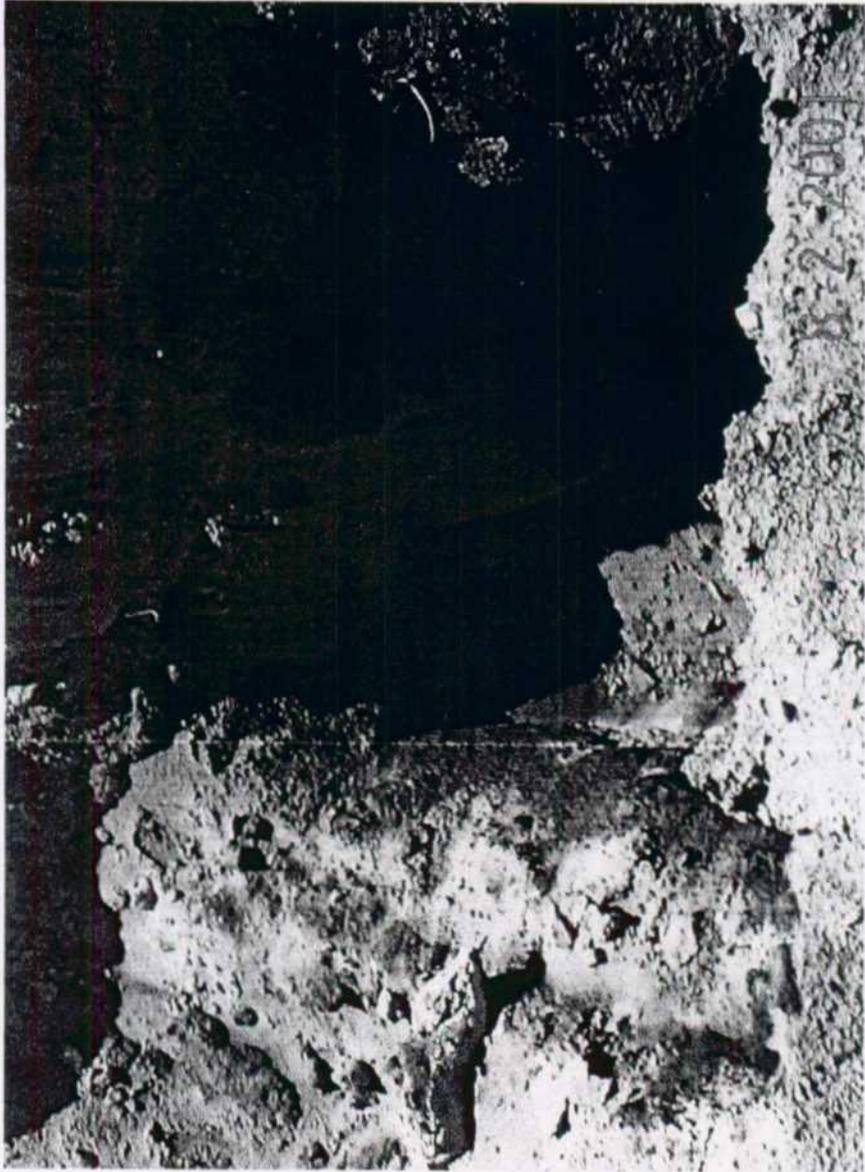
Xc: NMOCD – Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

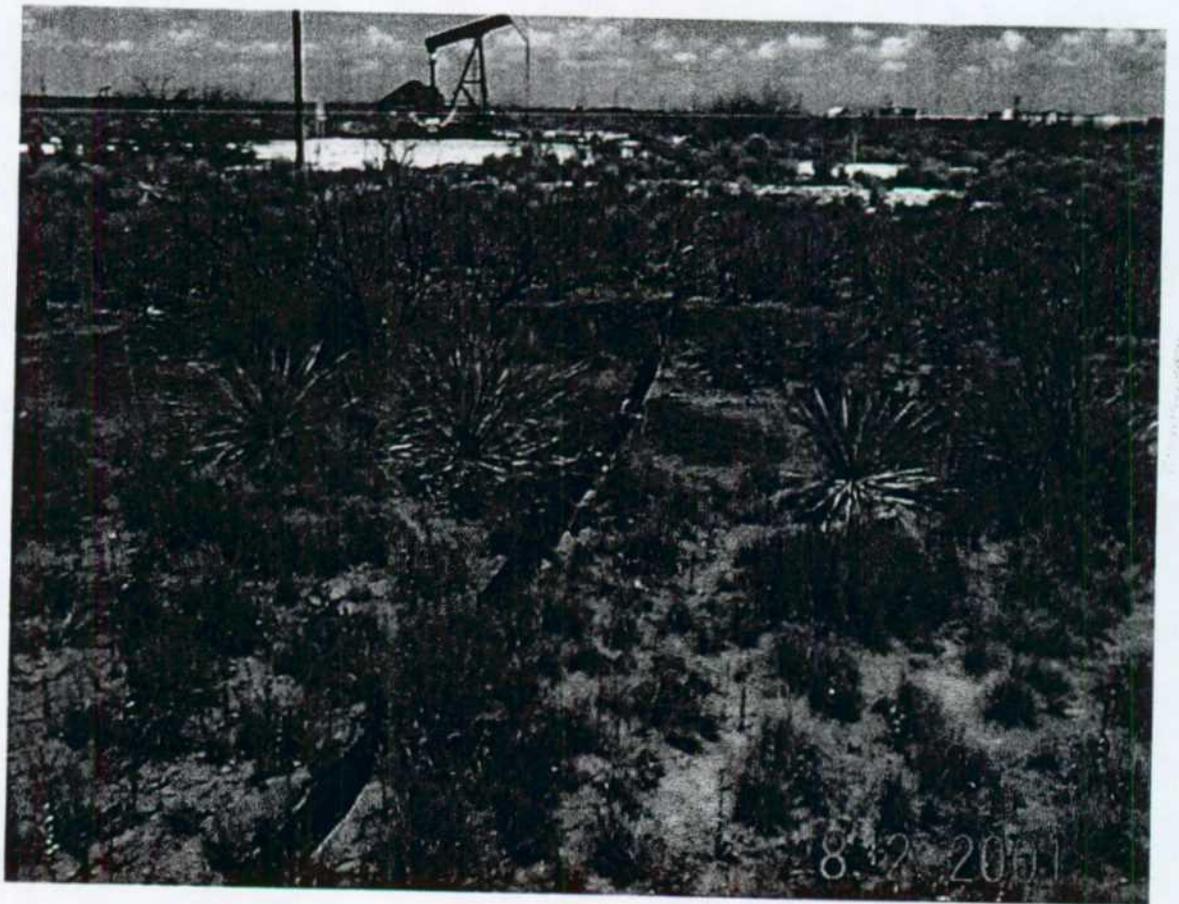




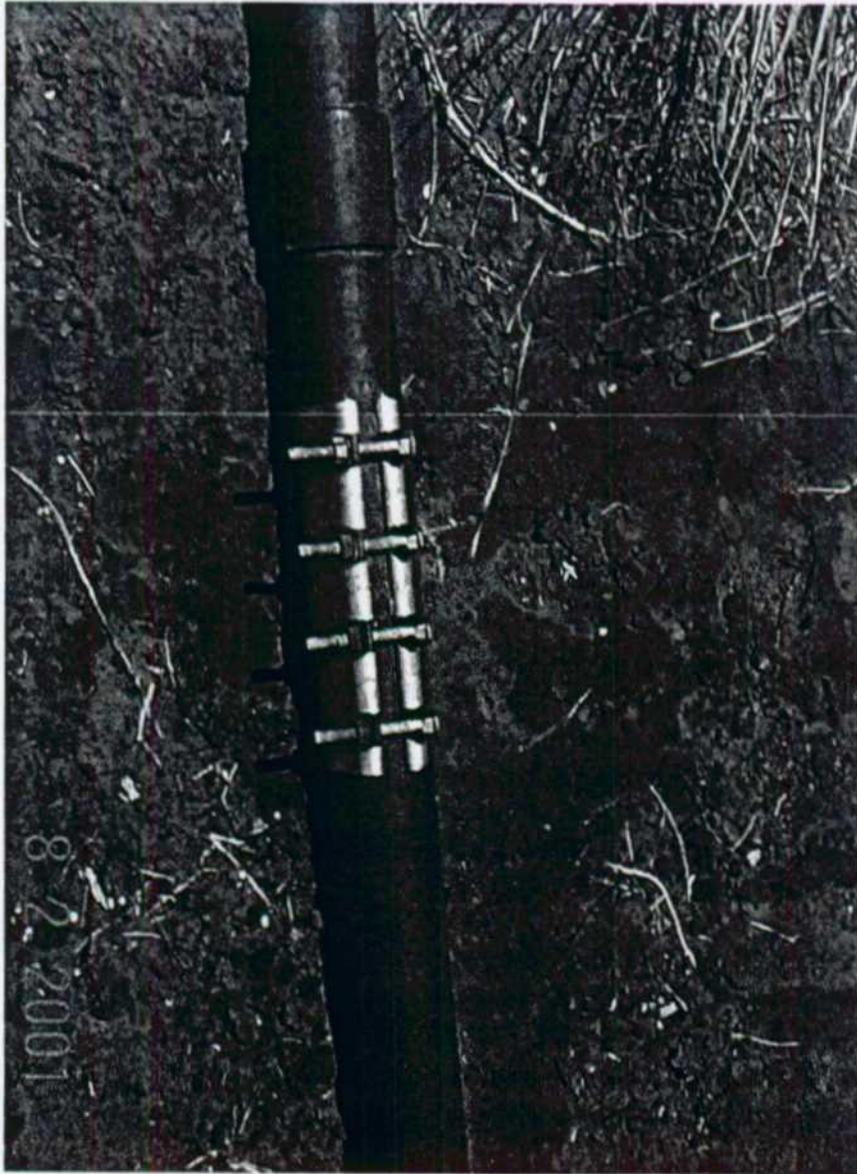








8-2-2001



AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

August 15, 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0003 1887 7902

Mr. Paul Sheeley
Oil Conservation Division
1625 French Drive
Hobbs, New Mexico 88240

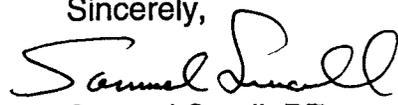
RE: **Pipeline Leak**
UL-K-Sec. 8, T-19S, R-35E
Lea County, New Mexico
NMOCD Letter of August 10, 2001

Dear Mr. Sheeley:

Neither of the leaks cited in the above referenced letter are deemed reportable by Amerada Hess Corporation (AHC), pursuant to Rule 116, and therefore submittal of C-141 forms are not required. The first leak cited, occurred on or about June 18, 2001 and was reported to be approximately 2 bbls in quantity based on observed surface damage. Initial clean-up efforts at the location discovered historical hydrocarbon contamination, of unknown origin or quantity, beneath the spill area. The second leak cited appears to be no more than 1 or 2 bbls and occurred some time prior to 1999.

Pursuant to our telephone conversation on August 14, 2001, AHC will employ a geoprobe on Friday the 16th to attempt a delineation of the impacted area in the vicinity of the first spill cited. Based on the results of this delineation effort, a work plan for further delineation and/or remediation will be submitted to the OCD. Clean up of the second spill cited will be undertaken in conjunction with clean up of the first site.

If you have any questions, please contact the undersigned at 915-758-6741 or at the letterhead address.

Sincerely,

Samuel Small, PE
Environmental Coordinator

Xc: OCD District 1 Supervisor
Houston Environmental File
PBBU Environmental File
Monument Area File

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-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 Chevron USA Inc.	Contact Nathan Mouser
Address 2401 Ave. "O", Eunice, NM 88231	Telephone No. 505-394-1247
Facility Name State A 26 Battery	Facility Type Tank Battery

Surface Owner State of NM	Mineral Owner	Lease No.
------------------------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	26	19S	36E	1980	South	330	West	Lea

NATURE OF RELEASE

Type of Release Crude	Volume of Release 18 BBLs	Volume Recovered 10 BBLs
Source of Release LACT Unit	Date and Hour of Occurrence 9:00 A.M. 8/7/01	Date and Hour of Discovery 09:00 A.M. 8/7/01
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
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.*

Meter housing on LACT unit failed because of internal corrosion.
Replace meter

Describe Area Affected and Cleanup Action Taken.*

Oil spilled on area 50' x 25' inside battery fenced yard. Vacuum truck and backhoe was used to pick up free fluids and excavate oily caliche. Clean up was completed the same day. All oil contaminated caliche was removed and hauled to approved land farm. Disposed of 32 yards of contaminated caliche.

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.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Nathan Mouser	Approved by District Supervisor:	
Title: Operations Supervisor	Approval Date:	Expiration Date:
Date: 8/14/2001 Phone/ 394-1247	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

August 10, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

USPS Certified Mail
Return Receipt #7099 3220 0002 3948 4042

Re: Pipeline Leak
UL-K -Sec. 8-T19S-R35E

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has become aware of two pipeline leaks. One leak is across the dirt road east of the above referenced pump site and the other is north about approximately 200 yards on the same line. See enclosed photographs. There is no release notification record of these releases. Pursuant to OCD **Rule 116** form C-141, ("*Release Notification and Corrective Action*"), must be submitted to the OCD district office within 15 days of the release. A remediation plan must also be submitted and approved by OCD.

Due to the proximity to the groundwater in this area the OCD is especially concerned with these releases and an expedient remediation is of a high priority.

OCD **hereby requires** Amerada Hess Corporation to submit a completed C-141 form by August 13, 2001 and a remediation plan by August 28, 2001 which includes the following:

1. A "Site Assessment" including "Ranking Criteria".
2. A plan for delineation of the horizontal and vertical extent of the Total Petroleum Hydrocarbons, Benzene, BTEX and Chlorides.
3. Please notify the OCD 48 hours in advance of any sampling event.

For guidance in this matter see Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

www.emnrd.state.nm.us/ocd/bureaus/environemntal/review/spill1.doc

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist



8. 2. 2001



8.2.2001





8/2/2001

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

August 15, 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7001 0360 0003 1887 7902

Mr. Paul Sheeley
Oil Conservation Division
1625 French Drive
Hobbs, New Mexico 88240

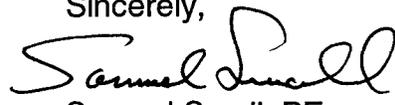
RE: **Pipeline Leak**
UL-K-Sec. 8, T-19S, R-35E
Lea County, New Mexico
NMOCD Letter of August 10, 2001

Dear Mr. Sheeley:

Neither of the leaks cited in the above referenced letter are deemed reportable by Amerada Hess Corporation (AHC), pursuant to Rule 116, and therefore submittal of C-141 forms are not required. The first leak cited, occurred on or about June 18, 2001 and was reported to be approximately 2 bbls in quantity based on observed surface damage. Initial clean-up efforts at the location discovered historical hydrocarbon contamination, of unknown origin or quantity, beneath the spill area. The second leak cited appears to be no more than 1 or 2 bbls and occurred some time prior to 1999.

Pursuant to our telephone conversation on August 14, 2001, AHC will employ a geoprobe on Friday the 16th to attempt a delineation of the impacted area in the vicinity of the first spill cited. Based on the results of this delineation effort, a work plan for further delineation and/or remediation will be submitted to the OCD. Clean up of the second spill cited will be undertaken in conjunction with clean up of the first site.

If you have any questions, please contact the undersigned at 915-758-6741 or at the letterhead address.

Sincerely,

Samuel Small, PE
Environmental Coordinator

Xc: OCD District 1 Supervisor
Houston Environmental File
PBBU Environmental File
Monument Area File

August 10, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

USPS Certified Mail
Return Receipt #7099 3220 0002 3948 4042

Re: Pipeline Leak
UL-K -Sec. 8-T19S-R35E

Dear Mr. Small:

The New Mexico Oil Conservation Division (OCD) has become aware of two pipeline leaks. One leak is across the dirt road east of the above referenced pump site and the other is north about approximately 200 yards on the same line. See enclosed photographs. There is no release notification record of these releases. Pursuant to OCD **Rule 116** form C-141, ("*Release Notification and Corrective Action*"), must be submitted to the OCD district office within 15 days of the release. A remediation plan must also be submitted and approved by OCD.

Due to the proximity to the groundwater in this area the OCD is especially concerned with these releases and an expedient remediation is of a high priority.

OCD **hereby requires** Amerada Hess Corporation to submit a completed C-141 form by August 13, 2001 and a remediation plan by August 28, 2001 which includes the following:

1. A "Site Assessment" including "Ranking Criteria".
2. A plan for delineation of the horizontal and vertical extent of the Total Petroleum Hydrocarbons, Benzene, BTEX and Chlorides.
3. Please notify the OCD 48 hours in advance of any sampling event.

For guidance in this matter see Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

www.emnrd.state.nm.us/ocd/bureaus/environmental/review/spill1.doc

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

September 7, 2001

Hand Delivered 9/7/01

Mr. Paul Sheeley
Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

RE: Pipeline Leak

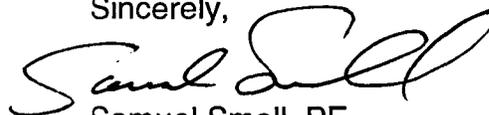
UL-K-Sec. 8, T-19S, R-35E
Lea County, New Mexico

On August 17, 2001 an attempt was made to delineate the extent of hydrocarbon contamination in the vicinity of the south leak using a geoprobe. The attempt was not successful due to the geoprobe's inability to penetrate beneath a depth of 18 feet at the site. No significant contamination was observed in the 'soil' samples recovered by the geoprobe. Subsequently, material at the location was excavated with a track-hoe and dozer to a depth of approximately 20 feet. A total of approximately 900 yards of material was removed from a 30 ft X 40 ft X 20 ft excavation. The material was hauled to disposal at the NMOCD permitted C & C Landfarm. Composite samples of material from the walls and floor of the excavation were collected and analyzed for hydrocarbon and chloride contamination. The results of the analyses are attached. Amerada Hess Corporation intends to complete work at this site by lining the bottom of the excavation with two (2) feet of red-bed clay and backfilling with clean (< 100 ppm TPH) material.

Contaminated material at the second (north) spill was excavated to a depth of approximately three feet, at which point the site appeared to be cleaned up. Samples collected at the second site are currently being analyzed for chloride and hydrocarbon contamination.

When the results of the analyses on samples from the second site are received, assuming that they indicate that the site is clean, AHC will commence backfilling and contouring both sites.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: OCD – Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

9-7-01; 6:33AM; MONUMENT
Sep 04 01 05:25p

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

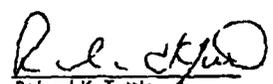
Sample Type: Soil
Sample Condition: Intact/ Iced/ 2 deg C
Project #: AHC 1202R
Project Name: T. Anderson Amerada Hess Corp.
Project Location: Monument, NM

Sampling Date: 08/31/01
Receiving Date: 08/31/01
Analysis Date: 09/04/01

ELT#	FIELD CODE	Chloride mg/kg
0101485-01	Bottom	674
0101485-02	North Wall	514
0101485-03	South Wall	1840
0101485-04	East Wall	177
0101485-05	West Wall	230

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	26
SPIKE	532
SPIKE DUP	541
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.66

Methods: SW 846-9253


Roland K. Tuttle

9-04-01
Date

9-7-01; 6:33AM; MONUMENT
 Sep 04 01 05:25p

p.2

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
 ATTN: MR. KEN DUTTON
 2540 W. MARLAND
 HOBBS, NM 88240
 FAX: 505-397-4701

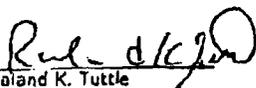
Sample Type: Soil
 Sample Condition: Intact/ Iced/ 2 deg C
 Project #: AHC 1702R
 Project Name: T. Anderson Amerada Hess Corp.
 Project Location: Monument, NM

Sampling Date: 08/31/01
 Receiving Date: 08/31/01
 Analysis Date: 09/04/01

ELI#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10 C28 mg/kg
0101485-01	Bottom	<10	231
0101485-02	North Wall	<10	63
0101485-03	South Wall	<10	<10
0101485-04	East Wall	<10	<10
0101485-05	West Wall	<10	<10

QUALITY CONTROL	476	539
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	95	108
SPIKED AMOUNT	476	476
ORIGINAL SAMPLE	<10	<10
SPIKE	487	505
SPIKE DUP	495	510
% EXTRACTION ACCURACY	102	106
BLANK	<10	<10
RPD	2	1

Methods: SW 846-8015M


 Roland K. Tuttle

9-04-01
 Date

SEP 04 01 05:25P
-9- 7-01; 6:33AM; MONUMENT
SEP 04 01 05:25P

P.1

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

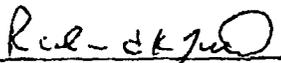
Sample Type: Soil
Sample Condition: Intact/ Iced/ 2 deg C
Project #: AHC 1202R
Project Name: T. Anderson Amerada Hess Corp.
Project Location: Monument, NM

Sampling Date: 08/31/01
Receiving Date: 08/31/01
Analysis Date: 09/04/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0101485-01	Bottom	<0.025	0.041	<0.025	0.043	<0.025
0101485-02	North Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-03	South Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-04	East Wall	<0.025	<0.025	<0.025	<0.025	<0.025
0101485-05	West Wall	<0.025	<0.025	<0.025	<0.025	<0.025

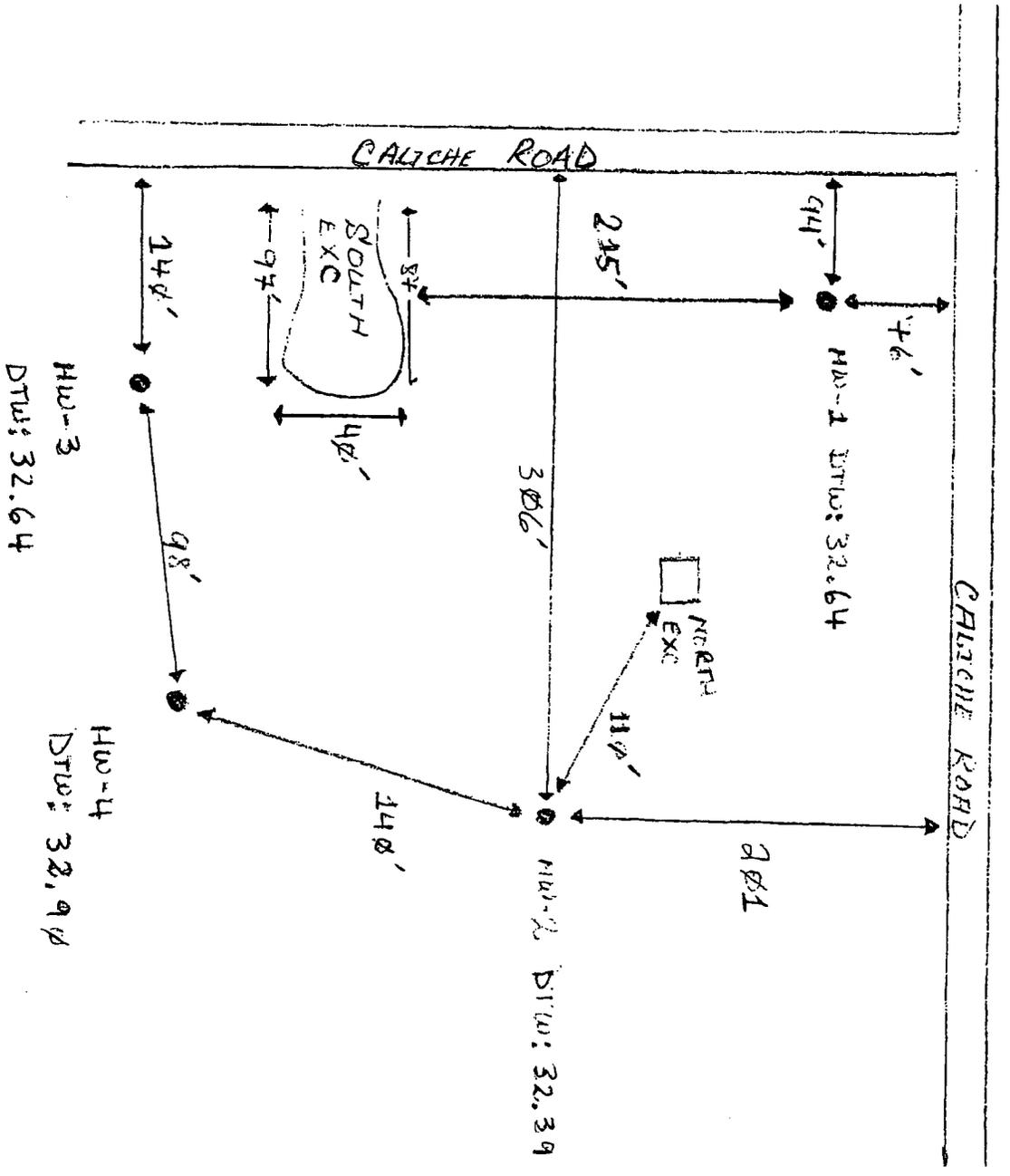
QUALITY CONTROL	0.092	0.097	0.099	0.189	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	92	97	99	95	98
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.085	0.085	0.082	0.164	0.087
SPIKE DUP	0.086	0.087	0.086	0.173	0.088
%EA	86	87	86	87	88
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1	2	4	5	1

METHODS: EPA SW 846-8021B, 5030


Raland K. Tuttle

9-4-01
Date

↑ N



T. ANDERSON
 See. 8-205-37E

NOT TO SCALE
 N. ANDERSON - 4776E

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

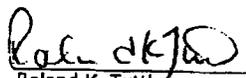
Sample Type: Soil
Sample Condition: Intact/ Iced/ 1.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/16/01
Receiving Date: 11/17/01
Analysis Date: 11/19/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0102044-01	South Pit 18'	<10	25
0102044-02	South Pit 26'	<10	47
0102044-03	North Side Wall	<10	<10
0102044-04	South Side Wall	<10	10

QUALITY CONTROL	455	527
TRUE VALUE	500	500
% INSTRUMENT ACCURACY	91	105
SPIKED AMOUNT	500	500
ORIGINAL SAMPLE	<10	<10
SPIKE	455	497
SPIKE DUP	450	493
% EXTRACTION ACCURACY	91	99
BLANK	<10	<10
RPD	1.10	0.81

Methods: SW 846-8015M


Roland K. Tuttle

11-20-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

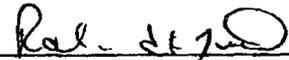
Sample Type: Soil
Sample Condition: Intact/ Iced/ 1.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/16/01
Receiving Date: 11/17/01
Analysis Date: 11/19/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102044-01	South Pit 18'	<0.025	<0.025	<0.025	<0.025	<0.025
0102044-02	South Pit 26'	<0.025	0.027	<0.025	0.025	<0.025
0102044-03	North Side Wall	<0.025	0.026	<0.025	<0.025	<0.025
0102044-04	South Side Wall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.097	0.094	0.098	0.202	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	95	93	99	102	97
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	0.044	0.179	0.081	0.379	0.035
SPIKE	0.109	0.110	0.111	0.231	0.117
SPIKE DUP	0.100	0.106	0.112	0.230	0.113
% EXTRACTION ACCURACY	98	99	109	108	112
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	8.78	3.94	0.92	0.00	3.51

METHODS: EPA SW 846-8021B ,5030



Roland K. Tuttle

Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

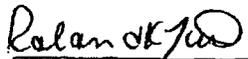
Sample Type: Soil
Sample Condition: Intact/ Iced/ 1.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/16/01
Receiving Date: 11/17/01
Analysis Date: 11/19/01

ELT#	FIELD CODE	Chloride mg/kg
0102044-01	South Pit 18'	394
0102044-02	South Pit 26'	372
0102044-03	North Side Wall	560
0102044-04	South Side Wall	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	868
SPIKE	1360
SPIKE DUP	1370
% EXTRACTION ACCURACY	100
BLANK	<5.00
RPD	0.73

Methods: SW 846-9253


Raland K. Tuttle

11-20-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

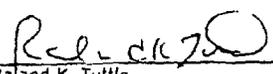
Sample Type: Water
Sample Condition: intact/ Iced/ HCI
Project Name: AHC T. Andersch
Project #: AHC 1203R
Project Location: Monument, NM

Sampling Date: 11/09/01
Receiving Date: 11/09/01
Analysis Date: 11/13/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101988-01	PIT GW	<0.001	0.002	0.002	0.002	0.003

QUALITY CONTROL	0.112	0.110	0.115	0.228	0.112
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	112	110	115	114	112
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	0.002	0.002	0.002	0.003
SPIKE	0.113	0.114	0.114	0.232	0.119
SPIKE DUP	0.104	0.103	0.108	0.216	0.108
% EXTRACTION ACCURACY	104	101	106	107	105
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	8.29	10.3	5.50	7.21	8.22

METHODS: EPA SW 846-8021B, 5030


Roland K. Tuttle

11-16-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

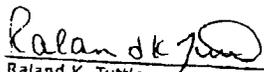
Sample Type: Water
Sample Condition: Intact/ Iced
Project Name: AHC T. Anderson
Project #: AHC 1203R
Project Location: Monument, NM

Sampling Date: 11/09/01
Receiving Date: 11/09/01
Analysis Date: 11/16/01

ELT#	FIELD CODE	Chloride mg/L
0101988-01	Pit GW	612

QUALITY CONTROL	
TRUE VALUE	5050
% INSTRUMENT ACCURACY	5000
SPIKED AMOUNT	101
ORIGINAL SAMPLE	500
SPIKE	151
SPIKE DUP	656
% EXTRACTION ACCURACY	665
BLANK	101
RPD	<5.00
	1.36

METHODS: EPA SW 846-9253


Roland K. Tuttle

11-16-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

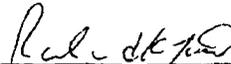
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1203R
Project Location: Monument, NM

Sampling Date: See Below
Receiving Date: 10/18/01
Analysis Date: 10/18/01

ELT#	FIELD CODE	Chloride mg/kg	SAMPLE DATE
0101798-01	MW-1 25'	133	10/11/01
0101798-02	MW-2 25'	222	10/11/01
0101798-03	MW-3 25'	83	10/12/01
0101798-04	MW-4 25'	62	10/12/01

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	625
ORIGINAL SAMPLE	89
SPIKE	709
SPIKE DUP	720
% EXTRACTION ACCURACY	99
BLANK	<5.00
RPD	1.54

Methods: SW 846-9253


Roland K. Tuttle

10-19-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

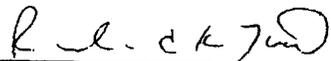
Sample Type: Water
Sample Condition: Intact/ Iced/ HCl/ -1.0 deg C
Project Name: T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 10/17/01
Receiving Date: 10/17/01
Analysis Date: 10/19/01

ELT#	FIELD CODE	BENZENE mg/L	TOLUENE mg/L	ETHYLBENZENE mg/L	m,p-XYLENE mg/L	o-XYLENE mg/L
0101790-01	MW 1	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-02	MW 2	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-03	MW 3	<0.001	<0.001	<0.001	<0.001	<0.001
0101790-04	MW 4	<0.001	<0.001	<0.001	<0.001	<0.001

QUALITY CONTROL	0.102	0.104	0.112	0.226	0.094
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	102	104	112	113	94
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.001	<0.001	<0.001	<0.001	<0.001
SPIKE	0.094	0.093	0.085	0.171	0.085
SPIKE DUP	0.092	0.091	0.088	0.177	0.087
%EA	94	93	85	86	85
BLANK	<0.001	<0.001	<0.001	<0.001	<0.001
RPD	2.15	2.17	3.47	2.30	2.32

METHODS: EPA SW 846-8021B ,5030


Raland K. Tuttle

10-22-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 W. MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

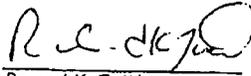
Sample Type: Water
Sample Condition: intact/ Iced/ -1.0 deg C
Project Name: T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 10/17/01
Receiving Date: 10/17/01
Analysis Date: 10/18/01

ELT #	FIELD CODE	Chloride mg/L
0101790-01	MW 1	532
0101790-02	MW 2	443
0101790-03	MW 3	549
0101790-04	MW 4	532

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	266
SPIKE	762
SPIKE DUP	771
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	1.17

Methods: SW 846-9253


Randall K. Tuttle

10-22-01
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763

Phone: 915-563-1800
Fax: 915-563-1713

Coc: 155

Project Manager: KEN DUTTON

Project Name: T. ANDERSON

Company Name: ETGI

Project #: AHC 1202N

Company Address: 2540 W MARLAND

Project Loc: MONUMENT, NM

City/State/Zip: HOBBS NM 88240

PO #:

Telephone No: (505) 397-4802

Fax No: (505) 397-4701

Sampler Signature: [Signature]

LAB # (lab use only)

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No of Containers	Preservative	Matrix	Analyze For:
0101790-01	MW 1	10/17/01	0830	3	HNO ₃	Water	Metals: As, Ag, Ba, Ca, Cr, Pb, Hg, Se TPM 8015M GR(C)CRO TPM TX 100S/100S TPM 1181 TDS / CL / SAR / EC Other (Specify)
02	MW 2		0845		HNO ₃	Water	Metals: As, Ag, Ba, Ca, Cr, Pb, Hg, Se TPM 8015M GR(C)CRO TPM TX 100S/100S TPM 1181 TDS / CL / SAR / EC Other (Specify)
03	MW 3		0900		HNO ₃	Water	Metals: As, Ag, Ba, Ca, Cr, Pb, Hg, Se TPM 8015M GR(C)CRO TPM TX 100S/100S TPM 1181 TDS / CL / SAR / EC Other (Specify)
04	MW 4		0915		HNO ₃	Water	Metals: As, Ag, Ba, Ca, Cr, Pb, Hg, Se TPM 8015M GR(C)CRO TPM TX 100S/100S TPM 1181 TDS / CL / SAR / EC Other (Specify)

TCLP	TOTAL	Metals: As, Ag, Ba, Ca, Cr, Pb, Hg, Se	Volatiles	Semivolatiles	BTEX 8021B/6030	ANALYZE FOR:
						CHLORIDES

Special Instructions:

Reinforced by: [Signature] Date: 10/17/01 Time: 1500

Reinforced by: [Signature] Date: 10/17/01 Time: 1500

Sample Containers Intact? (X) N

Temperature Upon Receipt: -10°C

Laboratory Comments:

RUSH TAT Pre-Schedule

Standard AT

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBBS, NM 88240
FAX: 505-397-4701

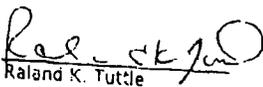
Sample Type: Soil
Sample Condition: intact / ced / 3.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/19/01
Receiving Date: 11/20/01
Analysis Date: 11/20/01

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
0102050-01	North Pit Bottom	<10	<10
0102050-02	North Pit North Sidewall	<10	<10
0102050-03	North Pit South Sidewall	<10	<10
0102050-04	North Pit East Sidewall	<10	<10
0102050-05	North Pit West Sidewall	<10	<10

QUALITY CONTROL		
TRUE VALUE	459	507
% INSTRUMENT ACCURACY	500	500
SPIKED AMOUNT	92	101
ORIGINAL SAMPLE	476	476
SPIKE	<10	<10
SPIKE DUP	527	579
% EXTRACTION ACCURACY	556	603
BLANK	111	122
RPD	<10	<10
	5.36	4.06

Methods: SW 846-8015M


Roland K. Tuttle

11-26-01
Date

HECKY

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBBS, NM 89240
FAX: 505-397-4701

Sample Type: Soil
Sample Condition: Intact/ Iced/ 3.0 deg C
Project Name: AMC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/19/01
Receiving Date: 11/20/01
Analysis Date: 11/19/01

ELT#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102050-01	North Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-02	North Pit North Sidewall	<0.025	0.026	<0.025	<0.025	<0.025
0102050-03	North Pit South Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-04	North Pit East Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025
0102050-05	North Pit West Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.097	0.094	0.098	0.202	0.098
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% INSTRUMENT ACCURACY	97	94	98	102	97
SPIKED AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	<0.025	<0.025	<0.025	<0.025
SPIKE	0.095	0.095	0.098	0.204	0.097
SPIKE DUP	0.097	0.096	0.100	0.207	0.099
% EXTRACTION ACCURACY	95	95	98	102	97
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	2.08	1.05	2.02	1.94	2.04

METHODS: EPA SW 846-8021B ,5030

Ralene K Tuttle
Ralene K. Tuttle

11-26-01
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: KEN DUTTON
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

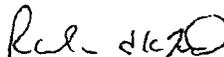
Sample Type: Soil
Sample Condition: Intact/ Iced/ 3.0 deg C
Project Name: AHC T. Anderson
Project #: AHC 1202R
Project Location: Monument, NM

Sampling Date: 11/19/01
Receiving Date: 11/20/01
Analysis Date: 11/20/01

ELT#	FIELD CODE	Chloride mg/kg
0102050-01	North Pit Bottom	71
0102050-02	North Pit North Sidewall	133
0102050-03	North Pit South Sidewall	71
0102050-04	North Pit East Sidewall	35
0102050-05	North Pit West Sidewall	142

QUALITY CONTROL	5050
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	667
ORIGINAL SAMPLE	83
SPIKE	756
SPIKE DUP	756
% EXTRACTION ACCURACY	101
BLANK	<5.00
RPD	0.0

Methods: SW 846-9253


Roland K. Tuttle

11-26-01
Date



NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

FAX

TO: Roger Anderson
FROM: Paul Shreeley
Energy Minerals and Natural Resources Department,
Oil Conservation Division
RE: letter to Sam Small dated 12/20/01
DATE: 4-4-02

The following is the letter sent to Sam Small. I did not copy the final version to my computer. Randy was sent the draft by mistake. Sam faxed me today.

Paul

2

Pages (Including Transmittal)



NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

FAX

TO: Randy Bayliss
FROM: Paul Sheehey
Energy Minerals and Natural Resources Department,
Oil Conservation Division
RE: NMGSAV Bat #67 (MayLove)
DATE: 3-20-02

Have Fun!

~ 20 Pages (Including Transmittal)

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 3, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandon Battery Site Remediation**
NMGSAU Batt. 63 (L-31, T-19S, R-37E)
NMGSAU Batt. 67 (O-32, T-19S, R-37E) *(May Love)*
Lea County, New Mexico

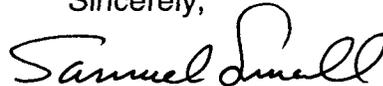
Dear Mr. Sheeley:

Amerada Hess Corporation plans to drill monitor wells at the subject sites to determine if groundwater beneath the sites exhibits impacts from past operations. The wells are to be drilled and completed according to NMOCD recommended practices. Groundwater samples will be analyzed for chloride, TDS and BTEX concentrations. Drill cuttings will be analyzed for chloride, TPH and BTEX concentrations.

Excavation activities at Battery 63 have been suspended pending the results of the monitor well testing. Material has been excavated in the east pit area to a depth of approximately 15 feet and contaminated material is still being encountered. Excavation activities at Battery 67 are ongoing at this time and the monitor wells are being drilled because of the relatively shallow groundwater depth in the area.

If you have any questions or need additional information, please call the undersigned at 915-758-6741.

Sincerely,



Samuel Small
Environmental Coordinator

Xc: NMOCD - Santa Fe
Houston Environmental File
PBBU Environmental File
Monument Files



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

December 20, 2001

Lori Wrotenbery
Director
Oil Conservation Division

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation Denial
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure approval sent to Amerada Hess Corporation for the site referenced above is hereby rescinded. Any remediation will require strict adherence to: Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

www.emnrd.state.nm.us/ocd/bureaus/environmental/review/spill1.doc

All backfill must be below the TPH and BTEX concentration criteria for the ranking score of this site.

If you have any questions or need any assistance please feel free to contact me at (505) 393-6161 x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe
Chris Williams - District I Supervisor
William Olson - OCD Hydrologist, Santa Fe
Larry Johnson - OCD Environmental Engr.

Oil Conservation Division * 1625 French Drive * Hobbs, New Mexico 88240
Phone: (505) 393-6161 * Fax (505) 393-0720 * <http://www.emnrd.state.nm.us>

October 30, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevron May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is hereby approved under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perrimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-8700

October 25, 2001

Delivered by Hand 10/26/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

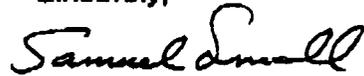
Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

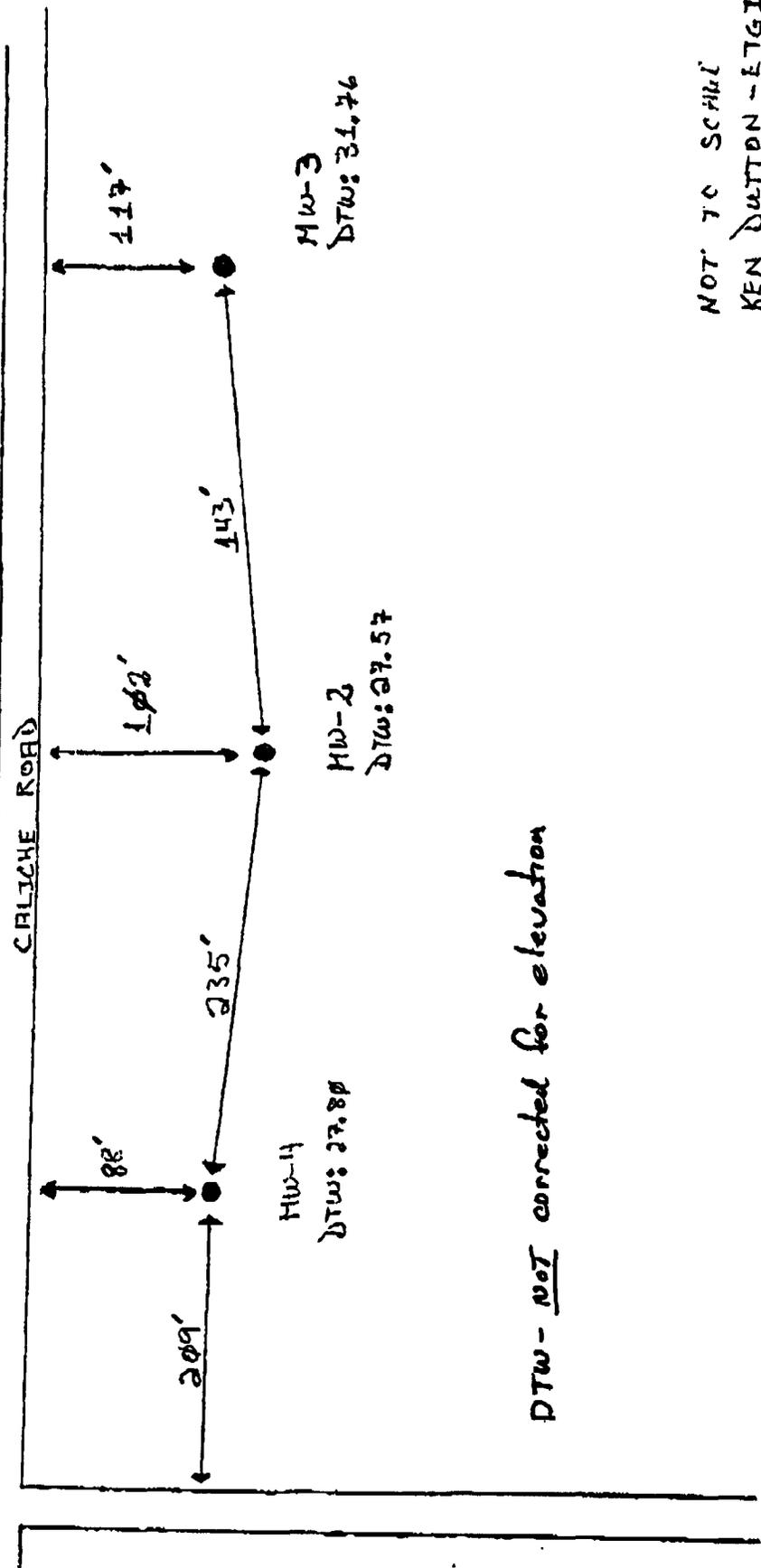
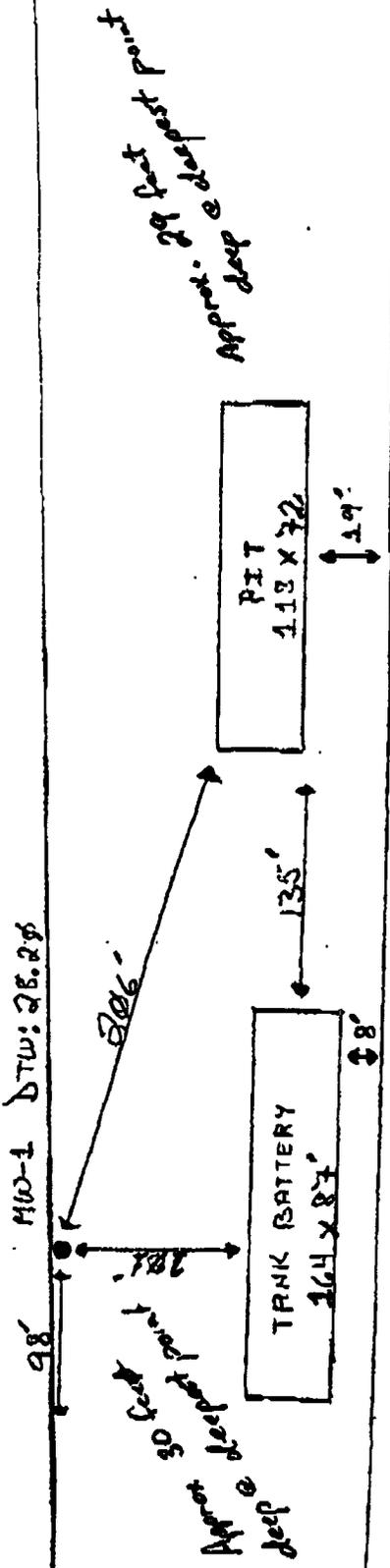
Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

CHEVRON MRY LOVE



DTW - NOT corrected for elevation

NOT TO SCALE
KEN DUTTON - ETGI

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-8700

October 3, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: Abandon Battery Site Remediation
NMGSAU Batt. 63 (L-31, T-19S, R-37E)
NMGSAU Batt. 67 (O-32, T-19S, R-37E) *(May Love)*
Lea County, New Mexico

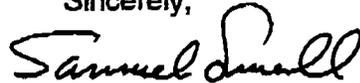
Dear Mr. Sheeley:

Amerada Hess Corporation plans to drill monitor wells at the subject sites to determine if groundwater beneath the sites exhibits impacts from past operations. The wells are to be drilled and completed according to NMOCD recommended practices. Groundwater samples will be analyzed for chloride, TDS and BTEX concentrations. Drill cuttings will be analyzed for chloride, TPH and BTEX concentrations.

Excavation activities at Battery 63 have been suspended pending the results of the monitor well testing. Material has been excavated in the east pit area to a depth of approximately 15 feet and contaminated material is still being encountered. Excavation activities at Battery 67 are ongoing at this time and the monitor wells are being drilled because of the relatively shallow groundwater depth in the area.

If you have any questions or need additional information, please call the undersigned at 915-758-6741.

Sincerely,



Samuel Small
Environmental Coordinator

Xc: NMOCD - Santa Fe
Houston Environmental File
PBBU Environmental File
Monument Files

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 5, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N French Drive
Hobbs, New Mexico 88240-1981

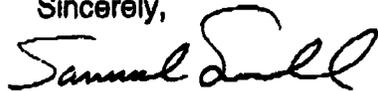
RE: **Abandoned Battery Site Remediation**
NMGSAU Batt. 67 (May have)
Unit O, Sec. 32, T-19S, R-37E
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5th. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: NMOCD - Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

MAR-21-02 16:04 From:8152210
 Dec 04 01 01:59p
 Dec 04 01 03:19p

15053938758

T-421 P.10/17 Job-884
 P. 6

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

E.T.G.I.
 ATTN: CAMILLE REYNOLDS
 2540 WEST MARLAND
 HOBBS, NM 88240
 FAX: 505-397-4701

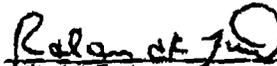
Sample Type: Soil
 Sample Condition: Intact/ leach/ -0.3 deg C
 Project Name: AHC Chevron May Love
 Project #: AHC 1205R
 Project Location: Manument, NM

Sampling Date: 11/28/01
 Receiving Date: 11/30/01
 Analysis Date: 11/29/01

EL#	FIELD CODE	BENZENE mg/kg	TOLUENE mg/kg	ETHYLBENZENE mg/kg	m,p-XYLENE mg/kg	o-XYLENE mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-02	East Pit Backfill 5-10'	<0.025	<0.025	<0.025	<0.025	<0.025
0102098-03	Former Tank Batt. NW Sidewall	<0.025	<0.025	<0.025	<0.025	<0.025

QUALITY CONTROL	0.080	0.080	0.093	0.192	0.089
TRUE VALUE	0.100	0.100	0.100	0.200	0.100
% IA	90	89	93	96	89
SPIKE AMOUNT	0.100	0.100	0.100	0.200	0.100
ORIGINAL SAMPLE	<0.025	0.061	0.257	0.410	0.143
SPIKE	0.069	0.090	0.101	0.190	0.097
SPIKE DUP	0.090	0.095	0.110	0.220	0.106
%EA	90	93	100	102	100
BLANK	<0.025	<0.025	<0.025	<0.025	<0.025
RPD	1.12	5.52	0.42	12.5	9.42

METHODS: EPA SW 846-80210 ,5030


 Roland K. Turbe

12-04-01
 Date

12800 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1710

DEC-04-01 TUE 04:15 PM FROM:

TO:

PAGE 2

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

E.T.G.I.
ATTN: CAMILLE REYNOLDS
2540 WEST MARLAND
HOBBS, NM 88240
FAX: 505-397-4701

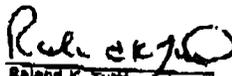
Sample Type: Sod
Sample Condition: Intact/ Iced/ -0.5 deg C
Project Name: AHC Chevron May Love
Project #: AHC 1205R
Project Location: Monument, NM

Sampling Date: 11/28/01
Receiving Date: 11/30/01
Analysis Date: 12/02/01

SLY#	FIELD CODE	GRO C6-C10 mg/kg	GRO >C10-C28 mg/kg
0102098-01	Former Tank Batt. Pit Bottom	<10	41
0102098-02	East Pit Backfill 5-10'	<10	202
0102098-03	Former Tank Batt. NW Sidewall	<10	142

QUALITY CONTROL		
TRUE VALUE	482	500
% INSTRUMENT ACCURACY	500	500
SPIKED AMOUNT	97	117
ORIGINAL SAMPLE	478	476
SPIKE	<10	<10
SPIKE DUP	499	628
% EXTRACTION ACCURACY	803	634
BLANK	106	123
RPD	<10	<10
	0.80	0.63

Methods: SW 846-8015M


Roland K. Tuttle

12-04-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1711

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt"

E.T.G.I.
ATTN: CAMILLE REYNOLDS
2540 WEST MARLAND
MOBBS, NM 88240
FAX: 905-357-4701

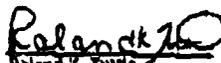
Sample Type: Soil
Sample Condition: Intact/ Iced/ -0.5 deg C
Project Name: AMC Chevron May Love
Project #: AMC 1205R
Project Location: Monument, NM

Sampling Date: 11/28/01
Receiving Date: 11/30/01
Analysis Date: 12/03/01

ELT#	FIELD CODE	Chloride mg/kg
0102098-01	Former Tank Batt. Pit Bottom	66
0102098-02	East Pit Backfill 5-10'	18
0202098-03	Former Tank Batt. NW Sidewall	78

QUALITY CONTROL	3080
TRUE VALUE	5000
% INSTRUMENT ACCURACY	101
SPIKED AMOUNT	500
ORIGINAL SAMPLE	18
SPIKE	523
SPIKE DUP	523
% EXTRACTION ACCURACY	101
BLANK	210
RPD	0.0

Methods: SW 846-8015M


Roland K. Tuttle

12-04-01
Date

12600 West I-20 East • Odessa, Texas 79765 • (915) 563-1800 • Fax (915) 563-1712

**NMGSAU BATTERY NO. 67
ANALYTICAL RESULTS
(PPM)**

SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1 Groundwater from								
2 West Excavation	< 0.001	< 0.001	< 0.001	< 0.001			284	1158
3 Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001			266	
4 Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001			248	
5 Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001			213	
6 Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001			301	
7 Vadose Zone MW #1								
8 Sample at 30'					< 10	< 10	18	
9 Vadose Zone MW #2								
10 Sample at 30'					< 10	< 10	24	
11 Vadose Zone MW #3								
12 Sample at 25'					< 10	< 10	18	
13 Vadose Zone MW #4								
14 Sample at 25'					< 10	< 10	24	
15 Bottom of East Excavation	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
16 Bottom of West Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	

December 3, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The revised closure proposal referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation dated November 30, 2001 is **hereby approved**.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please feel free to write or call me at (505) 393-6161, x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

November 30, 2001

HAND DELIVRED 11/30/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

Samuel Small
Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 3, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

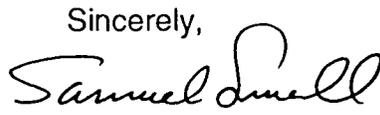
RE: Abandon Battery Site Remediation
NMGSAU Batt. 63 (L-31, T-19S, R-37E)
NMGSAU Batt. 67 (O-32, T-19S, R-37E)
Lea County, New Mexico

Dear Mr. Sheeley:

Amerada Hess Corporation plans to drill monitor wells at the subject sites to determine if groundwater beneath the sites exhibits impacts from past operations. The wells are to be drilled and completed according to NMOCD recommended practices. Groundwater samples will be analyzed for chloride, TDS and BTEX concentrations. Drill cuttings will be analyzed for chloride, TPH and BTEX concentrations.

Excavation activities at Battery 63 have been suspended pending the results of the monitor well testing. Material has been excavated in the east pit area to a depth of approximately 15 feet and contaminated material is still being encountered. Excavation activities at Battery 67 are ongoing at this time and the monitor wells are being drilled because of the relatively shallow groundwater depth in the area.

If you have any questions or need additional information, please call the undersigned at 915-758-6741.

Sincerely,

Samuel Small
Environmental Coordinator

Xc: NMOCD - Santa Fe
Houston Environmental File
PBBU Environmental File
Monument Files



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

December 20, 2001

Lori Wrotenbery
Director
Oil Conservation Division

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation Denial
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure approval sent to Amerada Hess Corporation for the site referenced above is hereby rescinded. Any remediation will require strict adherence to: Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc

All backfill must be below the TPH and BTEX concentration criteria for the ranking score of this site.

If you have any questions or need any assistance please feel free to contact me at (505) 393-6161 x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer

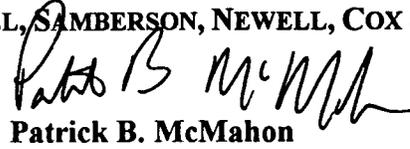
Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe
Chris Williams - District I Supervisor
William Olson - OCD Hydrologist, Santa Fe
Larry Johnson - OCD Environmental Engr.

Letter to Chris Williams
NMOCD
March 28, 2002
Page two

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:


Patrick B. McMahon

PBM:dr
Enclosures
pc: Ed Johnston
~~Randy Bayliss~~

December 3, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevron May Love)
UL-O--Sec. 32-T19S-R35E

Dear Mr. Small:

The revised closure proposal referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation dated November 30, 2001 is hereby approved.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need assistance please feel free to write or call me at (505) 393-6161, x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

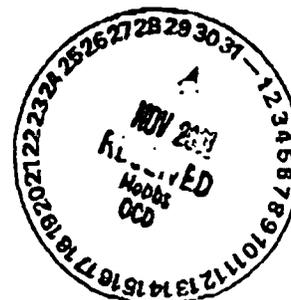
P.O. BOX 640
SEMINOLE, TEXAS 76360
915/758-6700

November 30, 2001

HAND DELIVRED 11/30/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico



Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,

Samuel Small
Samuel Small, PE
Environmental Coordinator

Xc: NMOC Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

October 30, 2001

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure request referenced above submitted to the New Mexico Oil Conservation Division (OCD) by Amerada Hess Corporation is hereby approved under the following conditions.

1. Amerada Hess Corporation shall backfill each excavation with remediated soil that contains no more than 500 mg/Kg Total Petroleum Hydrocarbons [TPH] and no more than 50 mg/Kg Total BTEX [BTEX].
2. Amerada Hess Corporation shall install the clay barriers extending to the maximum perimeter of each excavation.
3. Please notify the OCD 48 hours in advance of any sampling event.

Please be advised that OCD approval of this plan does not relieve Amerada Hess Corporation of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Amerada Hess Corporation of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions or need any assistance please write or call (505) 393-6161 x113.

Sincerely,

Paul Sheeley
Environmental Engineer
Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
William Olson - Hydrologist

Letter to Paul Scheeley
NMOCD
December 4, 2001
Page two.

lawsuits

Your response to Mr. Johnston's concerns was that you do not get involved ⁱⁿ between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:


Patrick B. McMahon

PBM:cd

cc: Ed Johnston
Lori Wrotenbery
Chris Williams

476-3462

LAW OFFICES**HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON**

C. GENR SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. MCMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1399
LOVINGTON, NM 88240
TELEPHONE (505) 396-5305
FAX (505) 396-5305

F.L. HEIDEL
(1913-1945)

December 4, 2001

Paul Scheesley
NMOCD
1625 N. French Drive
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit O, Section 32, Township 19 South, Range 37 East,
NMPM, Lea County, New Mexico**

Dear Mr. Scheesley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

December 20, 2001

Lori Wrotenbery
Director
Oil Conservation Division

Amerada Hess Corporation
Attn: Samuel Small
P.O. Box 840
Seminole, Texas 79360

Re: Abandon Battery Site Remediation Denial
NMGSAU Battery No. 67 (Chevon May Love)
UL-O -Sec. 32-T19S-R35E

Dear Mr. Small:

The closure approval sent to Amerada Hess Corporation for the site referenced above is hereby rescinded. Any remediation will require strict adherence to: Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

www.emnrd.state.nm.us/oed/bureaus/environmental/review/spill1.doc

All backfill must be below the TPH and BTEX concentration criteria for the ranking score of this site.

If you have any questions or need any assistance please feel free to contact me at (505) 393-6161 x113 or email psheeley@state.nm.us

Sincerely,

Paul Sheeley-Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief, Santa Fe
Chris Williams - District I Supervisor
William Olson - OCD Hydrologist, Santa Fe
Larry Johnson - OCD Environmental Engr.

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 5, 2001

RECEIVED

OCT 10 2001

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N French Drive
Hobbs, New Mexico 88240-1981

RE: Abandoned Battery Site Remediation
NMGSAU Batt. 67
Unit O, Sec. 32, T-19S, R-37E
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5th. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: NMOCD – Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. MCMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

December 4, 2001

FAXED
12-4-01

Paul Scheeley
NMOCD
1625 N. French Drive
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit O, Section 32, Township 19 South, Range 37 East,
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.

Letter to Paul Scheeley
NMOCD
December 4, 2001
Page two.

Your response to Mr. Johnston's concerns was that you do not get involved between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

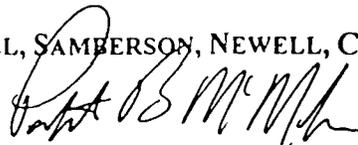
Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By



Patrick B. McMahon

PBM:cd
pc: Ed Johnston
Lori Wrotenbery
Chris Williams



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 HSNM
 ATTN: JOE DEAN
 P.O. DRAWER 1599
 LOVINGTON, NM 88260
 FAX TO:

Receiving Date: 01/23/02
 Reporting Date: 01/24/02
 Project Number: NOT GIVEN
 Project Name: JOHNSON
 Project Location: EUNICE, NM

Sampling Date: 01/23/02
 Sample Type: GROUNDWATER
 Sample Condition: COOL & INTACT
 Sample Received By: GP
 Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/L)	DRO (>C ₁₀ -C ₂₈) (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		01/23/02	01/23/02	01/23/02	01/23/02	01/23/02	01/23/02
H6458-1	J-PIT BOTTOM	<5.0	378*	<0.002	<0.002	<0.002	<0.006
Quality Control		30.0	26.0	0.102	0.103	0.103	0.301
True Value QC		30.0	30.0	0.100	0.100	0.100	0.300
% Recovery		100	86.7	102	103	103	100
Relative Percent Difference		2.0	15.3	0.5	3.1	0.7	0.2

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

*Oily top layer removed by decantation. Heavy oil (>C₂₈) also detected (56.9 mg/L).


 Burgess J. A. Cooke, Ph. D.

1/24/02

 Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

ARIZONA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 5, 2001

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N French Drive
Hobbs, New Mexico 88240-1981

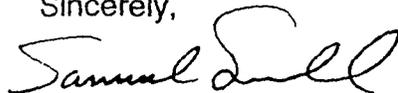
RE: Abandoned Battery Site Remediation
NMGSAU Batt. 67
Unit O, Sec. 32, T-19S, R-37E
Lea county, New Mexico

Dear Mr. Sheeley:

This letter will confirm my telephone call and voice mail message to you on October 5, 2001, advising the NMOCD that groundwater had been encountered while excavating at the above referenced abandoned tank battery site. Groundwater was observed in the bottom of the excavation on the morning of the 5th. A sample of the water will be collected and analyzed for chloride and BTEX concentration.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: NMOCD – Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 25, 2001

*Paul -
I will be out of
the office next
week. If you have
questions, call Rob
Williams @ 343-2844
Ext 103*

Delivered by Hand 10/26/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

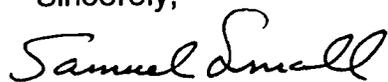
Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Small".

Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

**NMGSAU BATTERY NO. 67
ANALYTICAL RESULTS
(PPM)**

	SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1	Groundwater from								
2	West Excavation	< 0.001	< 0.001	< 0.001	< 0.001	< 10	< 10	284	1158
3	Monitor Well #1	< 0.001	< 0.001	< 0.001	< 0.001	< 10	< 10	266	
4	Monitor Well #2	< 0.001	< 0.001	< 0.001	< 0.001	< 10	< 10	248	
5	Monitor Well #3	< 0.001	< 0.001	< 0.001	< 0.001	< 10	< 10	213	
6	Monitor Well #4	< 0.001	< 0.001	< 0.001	< 0.001	< 10	< 10	301	
7	Vadose Zone MW #1								
8	Sample at 30'					< 10	< 10	18	
9	Vadose Zone MW #2					< 10	< 10	24	
10	Sample at 30'					< 10	< 10	18	
11	Vadose Zone MW #3					< 10	< 10	18	
12	Sample at 25'					< 10	< 10	24	
13	Vadose Zone MW #4					< 10	< 10	24	
14	Sample at 25'					< 10	< 10	24	
15	Bottom of East								
16	Excavation	< 0.025	< 0.025	< 0.025	< 0.025	< 10	24	51	
17	Bottom of West								
18	Excavation	< 0.025	< 0.025	< 0.025	0.033	< 50	1190	66	

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III
PATRICK B. MCMAHON

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NM 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

December 4, 2001

FAXED
12-4-01

Paul Scheeley
NMOCD
1625 N. French Drive
Hobbs NM 88240

**Re: Amerada-Hess Abandoned Battery Site Remediation
NMGSAU Battery No. 67
Unit O, Section 32, Township 19 South, Range 37 East,
NMPM, Lea County, New Mexico**

Dear Mr. Scheeley,

On Tuesday, December 4, 2001, I spoke with you regarding the above-referenced location. Your initial response, "Why would I talk to you?" took me by surprise. I informed you that my client, Ed Johnston, owns the land where the above-referenced remediation is taking place and that he asked me to contact you.

As I explained to you, my client has some valid concerns regarding Amerada's remediation of the above-referenced location. First, Amerada has refused Mr. Johnston's request to provide him with all sample results from soil and groundwater sampling conducted by Amerada. Instead, Amerada has sent Mr. Johnston sample results from a monitor well placed up-gradient of the contamination site. Second, Amerada's remediation plan, as outlined in Samuel Small's October 25, 2001 letter to you, does not comply with the OCD Guidelines for Remediation of Leaks, Spills and Releases.

Depth to groundwater at this location is less than fifty (50) feet. They plan to backfill their excavation with soil that may contain TPH levels up to 5000 ppm. Amerada informed you on October 5, 2001, that groundwater had been encountered during the excavation of the site, yet according to the Guidelines' ranking criteria, soil at this site should contain TPH levels of no more than one hundred (100) ppm. Mr. Johnston is aware that Amerada has requested to deviate from the approved Guidelines. However, Mr. Johnston suspects that Amerada has not shown that their proposed remediation will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted.

Letter to Paul Scheeley
NMOCD
December 4, 2001
Page two.

Your response to Mr. Johnston's concerns was that you do not get involved between surface owners and oil companies. Your position on this issue is contrary to your statutory duty to protect the public health and the environment. In addition, your unwillingness to visit with me regarding Mr. Johnston's concerns is contrary to public policy.

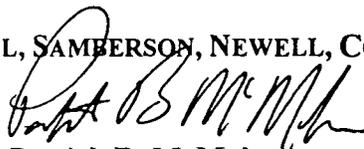
Mr. Johnston would like to see that Amerada's remediation follows NMOCD's Guidelines and that his surface and groundwater are adequately protected. Your refusal to discuss these concerns leaves Mr. Johnston with very few options.

Unless I hear from you or a representative of NMOCD we will consider your position on this matter to be the official position of NMOCD.

Sincerely,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON

By:



Patrick B. McMahon

PBM:cd
pc: Ed Johnston
Lori Wrotenbery
Chris Williams



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR

HSNCM

ATTN: JOE DEAN

P.O. DRAWER 1599

LOVINGTON, NM 88260

FAX TO:

Receiving Date: 01/23/02
 Reporting Date: 01/24/02
 Project Number: NOT GIVEN
 Project Name: JOHNSON
 Project Location: EUNICE, NM

Sampling Date: 01/23/02
 Sample Type: GROUNDWATER
 Sample Condition: COOL & INTACT
 Sample Received By: GP
 Analyzed By: BC

LAB NUMBER	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/L)	DRO (>C ₁₀ -C ₂₈) (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		01/23/02	01/23/02	01/23/02	01/23/02	01/23/02	01/23/02
H6458-1	J-PIT BOTTOM	<5.0	378*	<0.002	<0.002	<0.002	<0.006
Quality Control		30.0	26.0	0.102	0.103	0.103	0.301
True Value QC		30.0	30.0	0.100	0.100	0.100	0.300
% Recovery		100	86.7	102	103	103	100
Relative Percent Difference		2.0	15.3	0.5	3.1	0.7	0.2

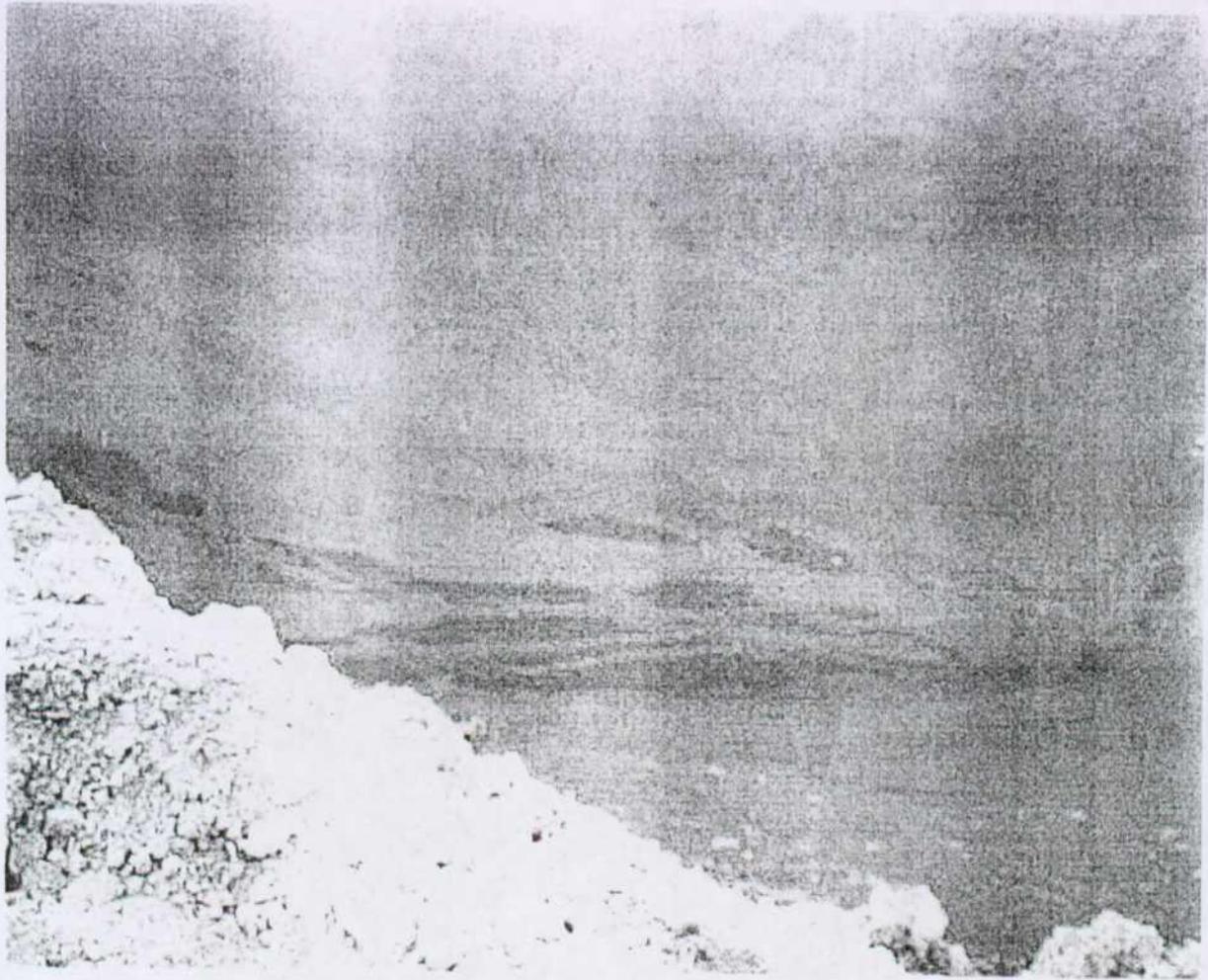
METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.

*Oily top layer removed by decantation. Heavy oil (>C₂₈) also detected (56.9 mg/L).

Burgess J. A. Cooke
 Burgess J. A. Cooke, Ph. D.

1/24/02
 Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

November 30, 2001

RECEIVED

DEC 03 2001

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

HAND DELIVRED 11/30/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico

Dear Mr. Sheeley:

Pursuant to your telephone call of November 29, 2001, Amerada Hess Corporation will utilize material, remediated to a TPH concentration less than 1500 ppm, total BTEX concentration less than 50 ppm and benzene concentration less than 10 ppm, to back-fill the excavations at the subject remediation site. It is also understood that a barrier of at least 3 feet of compacted redbed clay will be installed between the remediated material and the aquifer and that the final 3 feet of backfill will be clean material (< 100 ppm TPH).

If you have any questions or need additional information please contact the undersigned at 915-758-6741 or Rob Williams at 505-393-2144, ext. 103.

Sincerely,


Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

12358

AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

October 25, 2001

Delivered by Hand 10/26/01

Mr. Paul Sheeley
New Mexico Oil Conservation Division
District 1
1625 N. French Drive
Hobbs, New Mexico 88240-1981

RE: **Abandoned Battery Site Remediation**
NMGSAU Battery No. 67 (Chevron May Love)
Unit O, Sec. 32, T-19S, R-37E
Lea County, New Mexico

Dear Mr. Sheeley:

On October 3, 2001 Amerada Hess Corporation (AHC) sent you a letter outlining our plans to drill monitor wells at the referenced site to investigate possible impacts to the groundwater resulting from past operations at the subject abandoned battery. On October 5, 2001 AHC sent notification that groundwater had been encountered during excavation activities in the west pit (tank battery location) at the site and that a water sample was collected and submitted for analysis. Results of the analyses on the groundwater obtained from the excavation and from the monitor wells are attached. The analyses indicate that there are no impacts to the groundwater from past operations at this site.

Analyses of material obtained from the bottoms of the east and west excavations (see attached plat) indicates that the east excavation is clean, but some residual DRO exists in the west excavation. AHC plans to backfill the east excavation by installing three feet of compacted redbed clay and then backfilling to a depth approximately three feet from the surface with excavated material remediated to no more than 5000 ppm TPH and 50 ppm total BTEX (benzene < 10 ppm). The final three feet of backfill to the surface will be clean material (< 100 ppm TPH and < 50 ppm total BTEX).

Approximately one foot of contaminated material (material remaining above the groundwater) will be removed from the west excavation. Approximately five feet of clean material will be installed in the bottom of the excavation. Approximately three feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

feet of compacted redbed clay will be installed on top of the clean material and the excavation will then be backfilled in a similar manner to the east excavation.

If you have any questions or need additional information, please contact the undersigned at 915-758-6741.

Sincerely,

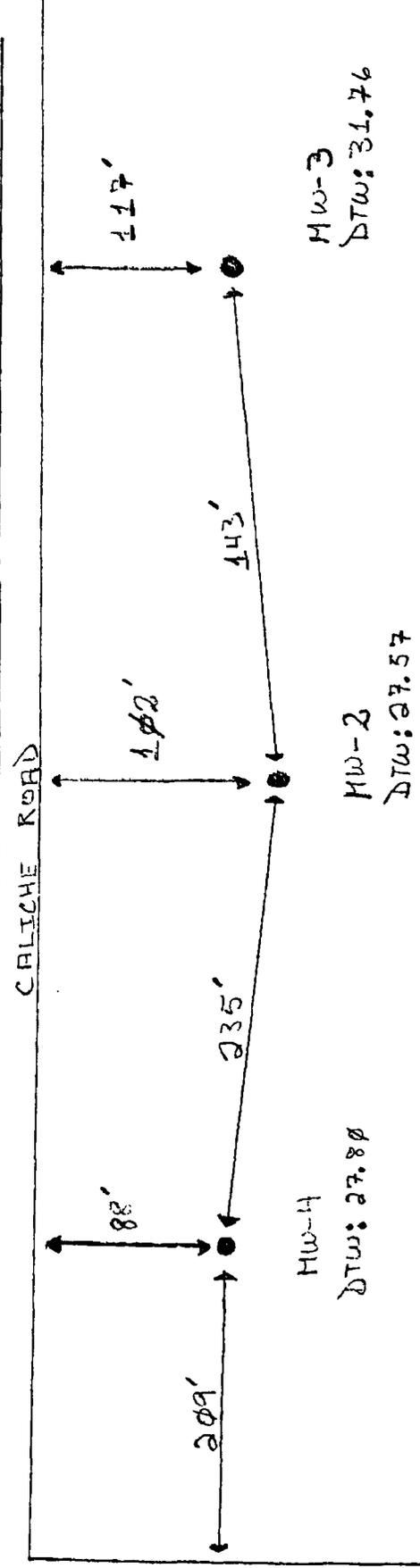
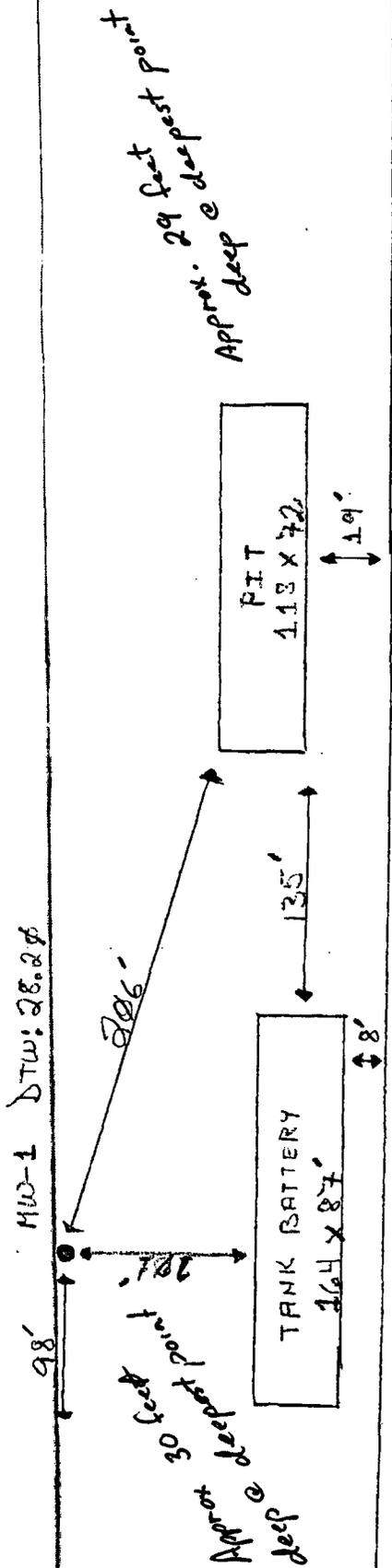
A handwritten signature in black ink that reads "Samuel Small". The signature is written in a cursive style with a large initial 'S'.

Samuel Small, PE
Environmental Coordinator

Xc: NMOCD Santa Fe
Houston Environmental File
PBBU Environmental File
Monument File

CHEVRON MRY LOVE

↑ N



DTW - NOT corrected for elevation

NOT TO SCALE
KEN DUTTON - ETGI

**NMGSAU BATTERY NO. 67
ANALYTICAL RESULTS
(PPM)**

SAMPLE	BENZENE	TOLUENE	E-BENZENE	XYLENE	GRO	DRO	CHLORIDE	TDS
1	Groundwater from							
2	West Excavation	< 0.001	< 0.001	< 0.001			284	1158
3	Monitor Well #1	< 0.001	< 0.001	< 0.001			266	
4	Monitor Well #2	< 0.001	< 0.001	< 0.001			248	
5	Monitor Well #3	< 0.001	< 0.001	< 0.001			213	
6	Monitor Well #4	< 0.001	< 0.001	< 0.001			301	
7	Vadose Zone MW #1							
8	Sample at 30'				< 10	< 10	18	
9	Vadose Zone MW #2							
10	Sample at 30'				< 10	< 10	24	
11	Vadose Zone MW #3							
12	Sample at 25'				< 10	< 10	18	
13	Vadose Zone MW #4							
14	Sample at 25'				< 10	< 10	24	
15	Bottom of East Excavation	< 0.025	< 0.025	< 0.025	< 10	24	51	
16	Bottom of West Excavation	< 0.025	< 0.025	0.033	< 50	1190	66	