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APPROVALS

YEAR(S): 2002-1773



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera

Cabinet Secretary

August 22, 2002

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 3929 9109

Mr. Ray Glover Jr. BP Pipelines (North America) Inc. 28100 Torch Parkway Suite 800 Warrenville, Illinois 60555

RE: BP Pipelines (North America) Inc. (formerly BP Amoco Pipeline)

Artesia New Mexico Station Eddy County, New Mexico

Dear Mr. Glover:

The OCD is receipt of the 2002 Annual Monitoring Report for the BP Amoco Pipeline Company's Artesia, New Mexico Station submitted by your consultant, BASCOR Environmental, Inc. BP Pipelines (North American) Inc. has recommended certain monitoring wells be plugged and abandoned. Based upon the information provided in the report the OCD herewith approves the plugging of the following monitoring wells and the modified monitoring program proposed in the annual report. Wells to be plugged are: MW-4, MW-6, MW-7, MW-8, MW-12, and MW-13. Please be advised that in the event impact to the groundwater is detected, in the vicinity of the above listed monitor wells, above WQCC groundwater standards that substitute monitor wells may be required to be constructed.

If you have any questions contact me at 505-476-3489.

Sincerely,

W. Jack Ford, C.P.G. Environment Bureau

Oil Conservation Division

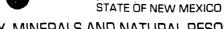
cc: Mr. Randolph B. Senn, CGWP, BASCOR Environmental, Inc.

OCD Artesia District Office

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

September 29, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z-274-520-715

Mr. Ray Glover Jr.
BPAmoco Pipeline Company
2810 Torch Parkway, Suite 800
Warrenville, Illinois 60555-3938

RE: DISCHARGE PLAN (GW-170)

ARTESIA CRUDE PUMPING STATION

EDDY COUNTY, NEW MEXICO

Dear Mr. Glover:

The New Mexico Oil Conservation Division (OCD) is in receipt of BPAmoco Pipeline Company's (BPAmoco) September 10, 1999 letter titled "BPAMOCO PIPELINE COMPANY'S ARTESIA, NEW MEXICO STATION". This document requests termination of discharge plan GW-170 for discharge of treated ground water generated during ground water remediation activities at BPAmoco's Artesia Crude Pumping Station. Termination of the discharge plan is requested since BPAmoco no longer discharges treated fluids at the site and the discharge system has been dismantled.

The OCD approves of the above referenced termination request with the following conditions:

- 1. BPAmoco shall continue to remediate and monitor contaminated ground water according to BPAmoco's July 12, 1999 "TRANSMITTAL OF FOURTH ANNUAL REPORT, BPAMOCO PIPELINE COMPANY'S ARTESIA NEW MEXICO STATION" and OCD's August 31, 1999 conditional approval.
- 2. An annual report on the ground water remediation and monitoring activities will be submitted to the OCD Santa Fe Office by July 1 each year with a copy provided to the OCD Artesia District Office. The annual reports shall contain:
 - a. A description of the monitoring and remediation activities which occurred during the past calendar year including conclusions and recommendations.

- b. Summary tables listing all past and present laboratory analytical results of water quality sampling for each monitoring point. Copies of the most recent years laboratory analytical data sheets and the associated quality assurance/quality control data shall also be submitted.
- c. A water table elevation map for each sampling event.
- d. A product thickness map for each sampling event.
- e. The volume of free product recovered in the remediation system during the year and the total volume recovered to date.
- f. The disposition of all wastes generated.

Please be advised that OCD approval does not limit BPAmoco to the above remediation and monitoring plan if the plan fails to adequately remediate or monitor contamination related to BPAmoco's activities. In addition, OCD approval does not relieve BPAmoco of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

xc:

OCD Artesia District

Randolph Senn, BASCOR Environmental, Inc.





ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION -

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

August 31, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z-274-520-704

Mr. Larry Malnor BPAmoco Pipeline Company 2810 Torch Parkway, Suite 800 Warrenville, Illinois 60555-3938

RE: GROUND WATER REMEDIATION DISCHARGE PLAN GW-170 AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Mr. Malnor:

The New Mexico Oil Conservation Division has reviewed BPAmoco Pipeline Company's (BPAPLC) July 12, 1999 "TRANSMITTAL OF FOURTH ANNUAL REPORT, BPAMOCO PIPELINE COMPANY'S ARTESIA NEW MEXICO STATION" which was submitted on behalf of BPAPLC by their consultant BASCOR Environmental, Inc. This document contains the results of BPAPLC's recent ground water remediation and monitoring activities. The document also contains recommendations to modify the site ground water monitoring plan and abandon several monitoring wells.

The above referenced ground water remediation discharge plan modification for discharge plan GW-170 for the BPAPLC Oil Company's Artesia Crude Pump Station is approved with the following conditions.

- 1. BPAPLC shall not plug and abandon any of the site ground water monitoring wells until the OCD issues final closure approval of the site remedial actions.
- 2. Ground water quality sampling of monitor wells MW-1, MW-5, MW-7, MW-9 and MW-10 shall be added to the 1999 annual sampling program. According to prior approvals these wells were supposed to be sampled if they did not contain free phase product.
- 3. With the exception of the proposed semi-annual monitoring of monitor wells MW-11 and MW-14, the OCD defers comment on modifications to the ground water monitoring program until the OCD has the opportunity to review the additional sampling data.

Mr. Larry Malnor August 31, 1999 Page 2

4. The discharge plan approval for remediation activities will expire on January 12, 2000 and you should submit an application for renewal in ample time before that date.

The discharge plan (GW-170) was originally approved on January 12, 1995. The modification does not significantly alter the discharge streams, therefore, public notice was not issued.

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3109.G and is approved pursuant to WQCC Regulation 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan.

Please note that Section 3104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. you are required to notify the Director of any expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Please be advised that approval of this plan does not relieve BPAPLC of liability should their operation fail to adequately remediate contamination related to BPAPLC's activities or should BPAPLC's operations result in additional pollution of surface or ground waters or the environment. In addition, OCD approval does not relieve BPAPLC of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

Roger C. Anderson

Bureau Chief

xc: Tim Gum, OCD Artesia District Office Randolph Senn, BASCOR Environmental, Inc.

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

October 6, 1998

<u>CERTIFIED MAIL</u> RETURN RECEIPT NO. Z-274-520-564

Mr. Larry Malnor Amoco Corporation 2810 Torch parkway, Suite 800 Warrenville, Illinois 60555-3938

RE: GROUND WATER REMEDIATION DISCHARGE PLAN GW-170 AMOCO ARTESIA PUMPING STATION

EDDY COUNTY, NEW MEXICO

Dear Mr. Malnor:

The New Mexico Oil Conservation Division has reviewed Amoco Corporation's (Amoco) June 30, 1998 "REMEDIATION SYSTEM OPERATIONS THIRD ANNUAL REPORT, AMOCO PIPELINE STATION, ARTESIA, NEW MEXICO" which was submitted on behalf of Amoco by their consultant Clayton Environmental Consultants. This document contains the results of Amoco's recent ground water remediation and monitoring activities. The document also contains a recommendation to modify the discharge plan by removing the oil-water separation and air stripper system from the site.

The above referenced ground water remediation discharge plan modification for discharge plan GW-170 for the Amoco Oil Company's Artesia Crude Pump Station is approved with the following condition.

1. Amoco will implement product recovery from monitor well MW-2 and will include the results of the recovery operations in subsequent annual reports.

The discharge plan (GW-170) was originally approved on January 12, 1995. The modification does not significantly alter the discharge streams, therefore, public notice was not issued.

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109. Please note Section 3109.G., which provides for possible future amendment of the plan.

Mr. Larry Malnor October 6, 1998 Page 2

Please note that Section 3104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. you are required to notify the Director of any expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

This discharge plan approval will expire on January 12, 2000 and you should submit an application for renewal in ample time before that date.

Please be advised that approval of this plan does not relieve Amoco of liability should their operation fail to adequately remediate contamination related to Amoco's activities or should Amoco's operations result in additional pollution of surface or ground waters or the environment. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,

Roger C. Anderson

Bureau Chief

Tim Gum, OCD Artesia District Office xc:

Hank Mittelhauser, Clayton Environmental Consultants

US Postal Service

Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See re ost Office, State, & ZIP Code Restricted Delivery Fee Special Delivery Fee

PS Form 3800, April 1995



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 14, 1997

CERTIFIED MAIL RETURN RECEIPT NO. P-410-431-192

Mr. Douglas S. Earney
Remediation Project Engineer
Amoco Oil Company
P.O. Box 7513
Chicago, Illinois 60680-7513

RE: GROUND WATER REMEDIATION DISCHARGE PLAN GW-170

AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Mr. Earney:

The New Mexico Oil Conservation Division has reviewed Amoco Oil Company's (Amoco) April 30, 1997 "REMEDIATION SYSTEM OPERATIONS 1997 FIRST QUARTERLY REPORT, AMOCO PIPELINE STATION, ARTESIA, NEW MEXICO" which was submitted on behalf of Amoco by their consultant Clayton Environmental Consultants, Inc. This document contains the results of Amoco's recent ground water remediation and monitoring activities. The document also contains proposals to modify the long term ground water monitoring plan and the ground water remediation system which was previously approved by the OCD under discharge plan GW-170.

The above referenced ground water remediation discharge plan modification for discharge plan GW-170 for the Amoco Oil Company's Artesia Crude Pump Station is hereby approved under the conditions in the enclosed attachment.

The discharge plan (GW-170) was originally approved on January 12, 1995. The modification does not significantly alter the discharge streams, therefore, public notice was not issued.

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109. Please note Section 3109.F., which provides for possible future amendment of the plan.

Mr. Douglas S. Earney July 14, 1997 Page 2

Please note that Section 3104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. you are required to notify the Director of any expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

This discharge plan approval will expire on January 12, 2000 and you should submit an application for renewal in ample time before that date.

Please be advised that approval of this plan does not relieve Amoco of liability should their operation result in additional pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,

Roger C. Anderson

Bureau Chief

Attachment

xc: Tim Gum, OCD Artesia District Office

US Postal Service

Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)
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Post Office, State, & ZIP Code

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July 14, 1995

DISCHARGE PLAN MODIFICATION APPROVAL CONDITIONS GROUND WATER REMEDIATION DISCHARGE PLAN GW-170 AMOCO OIL COMPANY ARTESIA CRUDE PUMPING STATION

1. Product and Waste Disposal:

All recovered product, waste filters or remediation and monitoring system waste products will be recycled and/or disposed of at an OCD approved facility or in an OCD approved manner.

2. Ground Water and Treatment System Monitoring:

Quarterly Ground water from monitor wells MW-11 and MW-14 will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene and xylenes (BTEX) on a quarterly basis using EPA approved methods and quality assurance/quality control (QA/QC).

Annually Ground water from all site monitor wells which do not contain free phase products will be sampled and analyzed for concentrations of BTEX on an annual basis using EPA approved methods and quality assurance/quality control (QA/QC).

3. Annual Reports:

An annual report will be submitted to the OCD by July 1 of each year. The annual reports will contain:

- a. A description of the monitoring and remediation activities which occurred during the year including conclusions and recommendations.
- b. Summary tables listing past and present laboratory analytic results of all water quality sampling for each monitoring point and plots of concentration vs. time for contaminants of concern from each monitoring point. Copies of the most recent years laboratory analytical data sheets and associated QA/QC data will also be submitted.
- c. A quarterly water table elevation map using the water table elevation of the ground water in all refinery monitor wells.

- d. Plots of water table elevation vs. time for each ground water monitoring point.
- e. A quarterly product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells.
- f. The volume of product recovered in the remediation system during each quarter and the total recovered to date.

4. Spills

All spills and/or leaks shall be reported to the OCD Santa Fe Office and OCD Artesia District Office pursuant to WQCC Rule 1203 and OCD Rule 116.

5. Notification

Amoco will notify the OCD Santa Fe Office at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

6. Submission Of Documents

All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHEDO SANTA FE, NEW MEXICO 97505 (505) 827-7131

March 14, 1995

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-224

Mr. Douglas S. Earney Remediation Project Engineer Amoco Oil Company P.O. Box 7513 Chicago, Illinois 60680-7513

RE: SOIL REMEDIATION
AMOCO ARTESIA PUMPING STATION
EDDY COUNTY, NEW MEXICO

Dear Mr. Earney:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco Oil Company's January 16, 1995 "AMOCO ARTESIA PUMPING STATION SURFACE SOIL REMEDIATION WORK PLAN".

The above referenced soil remediation plan is approved with the following conditions:

- 1. Amoco will include a description of the soil remedial actions and the quarterly soil sampling results in each quarterly report submitted pursuant to Amoco's ground water discharge plan GW-170.
- 2. Amoco will notify the OCD Santa Fe Office at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
- 3. All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please note that the depth to ground water, as shown in site investigation reports, is approximately 20 feet and not 200 feet. However, due to Amoco's operation of a ground water recovery system downgradient of this area and the presence of contaminated soils remaining under the sites crude storage tank, the OCD accepts the

Mr. Douglas S. Earney March 14, 1995 Page 2

remediation levels proposed. But, the OCD would like you to be aware that remaining contaminants in the soil profile may continue to contribute to ground water contamination at the site which may increase the length of time that the ground water remediation system must be operated.

Please be advised that approval does not relieve Amoco of liability should remaining contaminants in the soil pose a future threat to ground water, surface water or human health. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely

William C. Olson

Hydrogeologist

Environmental Bureau

xc: Tim Gum, OCD Artesia District Office

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Bill Olson

From:

Bill Olson

To:

Tim Gumm

Cc:

Ray Smith

Subject: Date:

Amoco Artesia Crude Pump Station

Fri, Mar 10, 1995 11:25AM

Priority:

High

Attached is a draft approval letter for the remediation of contaminated soils at the Amoco Artesia Crude Station. Please provide me with any written technical comments by 11:30 am on 3/14/95. Thanks!

< < File Attachment: SOILREM.APR > >

Bill Olson

From:

Tim Gumm

Date sent:

Mon, Mar 13, 1995 7:46AM

To:

Bill Olson

Subject:

Registered: Tim Gumm

Your message

To:

Tim Gumm

Subject:

Amoco Artesia Crude Pump Station

Date: Fri, Mar 10, 1995 11:25AM

was accessed on

Date:

Mon, Mar 13, 1995 7:46AM

State of New Mexico ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT



Santa Fe, New Mexico 87505
OIL CONSERVATION DIVISION
2040 S. Pacheco St.
Santa Fe, New Mexico 87505



January 12, 1995

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-202

Mr. Douglas S. Earney Remediation Project Engineer Amoco Oil Company P.O. Box 7513 Chicago, Illinois 60680-7513

RE: GROUND WATER REMEDIATION DISCHARGE PLAN GW-170 AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Mr. Earney:

The ground water remediation discharge plan application GW-170 for the Amoco Oil Company's Artesia Crude Pump Station is hereby approved under the conditions in the enclosed attachment. The discharge plan application consists of Amoco's June 1994 "INTERCEPTION TRENCH SYSTEM WORK PLAN, AMOCO PIPELINE STATION, ARTESIA, NEW MEXICO" and July 1, 1994 "ARTESIA PUMPING STATION SUBSURFACE INVESTIGATION - PHASE III REPORT REVISIONS".

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to section 3-109.A.. Please note Section 3-109.F., which provides for possible future amendment of the plan.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this approval is for a period of five years. This discharge plan approval will expire on January 12, 2000 and you should submit an application for renewal in ample time before that date.

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division P.O. Box 1948 87504-1948 827-5830

Park and Recreation Division P.O. Box 1147 87504-1147 827-7465 2040 South Pacheco

Office of the Secretary 827-5950

Administrative Services 827-5925

Energy Conservation & Management 827-5900 Mining and Minerals

827-5970

Oil Conservation 827-7131 Mr. Douglas S. Earney January 12, 1995 Page 2

The discharge plan application for the Amoco Artesia Crude Station is subject to the WQCC Regulation 3-114 discharge plan fees. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen hundred and eighty dollars (\$1380.00) for a ground water remediation discharge plan.

The fifty (50) dollar filing fee is due upon receipt of this approval. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: NMED-Water Quality Management Fund and addressed to the OCD Santa Fe Office.

Please be advised that approval of this plan does not relieve Amoco of liability should their operation result in additional pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

On behalf of the staff of the Oil Conservation Division, I wish to thank you for your cooperation during this discharge plan review.

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

Sincerely,

William J. La May

Director

Attachment

xc: Tim Gum, OCD Artesia District Office

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Certified Mail Receipt

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January 12, 1995

APPROVAL CONDITIONS GROUND WATER REMEDIATION DISCHARGE PLAN GW-170 AMOCO OIL COMPANY ARTESIA CRUDE PUMPING STATION

1. Payment of Discharge Plan Fees:

The \$1380.00 flat fee (either total payment or installment) and \$50.00 filing fee shall be paid upon receipt of this approval.

2. <u>Contaminated Soils</u>

Contaminated soils generated during the excavation of the trench will be segregated from clean overburden and stockpiled on a liner in a bermed area. After completion of the installation of the remediation system and prior to disposal of any contaminated soils, Amoco will test these soils and the drummed soils for hazardous characteristics and submit the test results and the method of disposal to the OCD Santa Fe Office for approval.

3. Trench Fill

In construction of the recovery trench, clean fill will be used for the final 5 feet of fill in the trench.

4. Below Grade Piping

Any below grade piping used to convey contaminated fluids to the treatment system will be pressure tested to three psi above operating pressure prior to operation.

5. <u>Irrigation Activities</u>

Treated water applied to the ground surface using the irrigation system will be applied in a manner such that it does not flow directly into Scoggins Draw.

6. Treatment System Monitoring

Effluent from the air stripper will be sampled and analyzed using appropriate EPA methods according to the following schedule:

Initially	Monthly	Annually
BTEX PAH's Heavy Metals Cations/Anions	BTEX	BTEX PAH's Heavy Metals Cations/Anions

7. Ground Water Monitoring

Ground water from monitor wells which do not contain free phase product will be sampled and analyzed using appropriate EPA methods according to the following schedule:

Initially	Quarterly	Annually
BTEX PAH's Heavy Metals Cations/Anions	BTEX	BTEX PAH's Heavy Metals Cations/Anions

8. Quarterly Reports

Quarterly reports will be submitted to the OCD Santa Fe Office on May 1, August 1, November 1 and February 1 of each respective year with a copy provided to the OCD Artesia Office. The quarterly report will contain the following information:

- a. A summary of the laboratory analytic results of water quality sampling of monitor wells and the treatment system from the previous quarter. The data from each monitoring point will be presented in tabular form and will list past and present sampling results.
- b. A product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells.
- c. The total volume of fluid pumped from the recovery trenches during the guarter and to date.
- d. The total volume of product recovered in the treatment system during the quarter and to date.
- e. The total volume of treated effluent applied to the irrigation system during the quarter and to date.

The first quarterly report will be due on May 1, 1995 and in addition to the above information will include the final as built construction details of the recovery system and the below grade piping pressure test results.

9. Product and Waste Disposal

All recovered product, waste filters, recovery system or treatment system waste products will be recycled and/or disposed of at an OCD approved facility.

10. Tank Berming

All above ground tanks used to contain fluids other than non-contaminated fresh water will be bermed such that they can contain one and one-third times the volume of the largest tank or all interconnected tanks.

11. Spills

All spills and/or leaks shall be reported to the OCD Santa Fe Office and OCD Artesia District Office pursuant to WQCC Rule 1-203 and OCD Rule 116.

12. Notification

Amoco will notify the OCD Santa Fe Office at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

13. Submission Of Documents

All original documents will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.



RECEIVED

Amoco Oil Company One Prudential Plaza

130 East Randolph Drive Post Office Box 7513 Chicago, Illinois 60680-7513

DEC 0 9 1994

Engineering & Construction

OIL CONSERVATION DIV. SANTA FF

December 5, 1994

Mr. William C. Olson New Mexico Oil Conservation Division Environmental Bureau 2040 S. Pacheco Santa Fe, NM 87505

RE: **Amoco Artesia Pumping Station**

Groundwater Remediation Temporary Discharge Authorization

Dear Mr. Olson:

To follow up on our conversation today, I have confirmed that our free product recovery system at this site started operation on November 21, 1994. As we discussed, our current temporary permit expires on December 12, 1994 which was originally set assuming an earlier startup of the system. Therefore, we request that the temporary authorization be extended to February 19, 1995 to remain consistent with the OCD's 120 days after startup policy for temporary authorizations. We understand that the OCD is planning to issue a permanent discharge permit prior to the expiration of the temporary permit.

For your information, I have attached our 1994-95 sampling and monitoring schedule for the site. These activities conform with the conditions outline in the Temporary Discharge Approval Conditions document dated August 12, 1994 and our discussion today. The first report due February 1, 1995 will include a summary of field activities, lab results, and an operation and maintenance manual for the system. Quarterly monitoring reports will start with the May 1, 1995 report.

If you have any questions of comments, please contact me at (312) 856-7251

Sincerely,

Douglas S. Earney

Remediation Project Engineer

Cc: L. K. Malnor

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remodiation system shortly A

should be issued shortly A

NOTES FOR AMOCO/ARTESIA

Schedule of Activities

1. Weekly Inspections (MBF)

- Conducted weekly until the end of December and then later as requested by Mittelhauser Corporation.
- Inspect operations pumps, oil water separator, air stripper, discharge system.
- Measure depth to groundwater in the three sumps.
- Measure depth to the silt in the three sumps.
- Record totalizer flow and pressure readings.
- Measure oil level in the recovery tank.

MITTELHAUSER CORP.

• Fax spreadsheet showing water level, silt level, oil level, totalizer flow, and pressure readings to Mittelhauser Corporation.

2. Monthly Inspections and Sampling (MBF)

- Sample Inlet and effluent of air stripper for BETX (method 8240).
- Submit samples to NET.
- Perform the inspections described above.

3. Quarterly Sampling (MBF)

- Perform quarterly sampling at the same time as monthly inspection and sampling.
- Determine free product thickness in all wells.
- If there is no free product in a well, sample the well for BETX.
- Submit samples to NET.

4. System Installation Report (Mittelhauser)

- Prepare draft by January 15, 1995.
- Submit to state by February 1, 1995.
- Summary of field activities, lab results, and deviations from the Work Plan.
- Provide O&M manual.

5. Quarterly Reporting (Mittelhauser)

- First report to be submitted May 1, 1995.
- All reports to contain the following information:



- Laboratory results, including a summary which shows past and present results in a tabular form for the monitoring wells and the treatment system.
- Product thickness map.
- Total volume of fluids pumped from the trenches (for quarter and year-to-date).
- Volume of oil recovered (quarter and year-to-date).
- Volume of water discharged during the quarter and year-to-date.

NOTE: Quarterly reports do not contain results from the last sampling event. For instance, the quarterly report submitted May 1, 1995 contains results from the January, February, and March sampling, not the results from samples obtained during the third week of April.

6. Annual Sampling (MBF)

• Annual sampling will be conducted during the third week of November 1995. It will include the sampling performed as part of the monthly inspection and sampling plan and the quarterly sampling. In addition, all monitoring wells not containing free product, plus the inlet and outlet of the air stripper, will be sampled for PAHs (method 8270) plus ICAP metals, mercury and selenium and cations/anions (sodium, calcium, magnesium potassium, chloride, bicarbonates, carbonates, fluoride, sulfate, total dissolved solids).

ADDITIONAL NOTES: MBF will order sample bottles from NET and ship samples under chain-of-custody procedures. NET will send the results and invoices to Mittelhauser Corporation. After 6 months MBF will notify Bill Olsen of planned sampling events at least one week in advance in order to allow the state to split samples if they so desire.



(15/10/21) (\$11-H20S4)

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STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING

ANITA LOCKWOOD CABINET SECRETARY

August 12, 1994

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-111-334-152

Ms. Vanessa A. Harris Amoco Oil Company P.O. Box 7513 Chicago, Illinois 60680-7513

RE: GROUND WATER REMEDIATION TEMPORARY DISCHARGE AUTHORIZATION AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Ms. Harris:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's June 1994 "INTERCEPTION TRENCH SYSTEM WORK PLAN, AMOCO PIPELINE STATION, ARTESIA, NEW MEXICO" and July 1, 1994 "ARTESIA PUMPING STATION SUBSURFACE INVESTIGATION - PHASE III REPORT REVISIONS" which were received by OCD on July 5, 1994. These documents contain information requested by OCD on May 31, 1994 related to the results of Amoco's recent ground water investigations at the Artesia Pump Station, Amoco's final plan for remediation of contaminated ground water and the discharge of treated ground water to an irrigation system.

The remedial action plan and discharge plan, as presented in the above referenced, documents is approved and pursuant to New Mexico Water Quality Control Commission (WQCC) Regulation 3-106.B. you are hereby authorized to discharge without an approved discharge plan until December 12, 1994 under the conditions contained in the enclosed attachment.

This temporary authorization is issued because of the necessity to protect ground water at the site and to allow the OCD time to process the plan under the WQCC discharge plan regulations. The OCD is currently issuing a public notice of the plan as required under WQCC regulation 3-108.

Ms.Vanessa A. Harris August 12, 1994 Page 2

Please be advised that OCD approval does not relieve Amoco of liability if the action plan fails to adequately remediate ground water contamination related to Amoco's activities. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact William Olson of my staff at (505) 827-5885.

Sincerely,

William J. LeMay

Director

xc: OCD Artesia Office

Benito Garcia, NMED Hazardonal Waste Bureau

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PS Form **3800**, June 1991

August 12, 1994

TEMPORARY DISCHARGE APPROVAL CONDITIONS GROUND WATER REMEDIAL ACTION PLAN AMOCO OIL COMPANY ARTESIA CRUDE PUMPING STATION

1. Contaminated Soils

Contaminated soils generated during the excavation of the trench will be segregated from clean overburden and stockpiled on a liner in a bermed area. After completion of the installation of the remediation system and prior to disposal of any contaminated soils, Amoco will test these soils and the drummed soils for hazardous characteristics and submit the test results and the method of disposal to the OCD Santa Fe Office for approval.

2. Trench Fill

In construction of the recovery trench, clean fill will be used for the final 5 feet of fill in the trench.

3. Below Grade Piping

Any below grade piping used to convey contaminated fluids to the treatment system will be pressure tested to three psi above operating pressure prior to operation.

4. Irrigation Activities

Treated water applied to the ground surface using the irrigation system will be applied in a manner such that it does not flow directly into Scoggins Draw.

5. Treatment System Sampling Schedule

Effluent from the air stripper will be sampled and analyzed using appropriate EPA methods according to the following schedule:

Initially	Monthly	Annually
BTEX PAH's Heavy Metals Cations/Anions	BTEX	BTEX PAH's Heavy Metals Cations/Anions

6. Monitor Well Sampling Schedule

Ground water from monitor wells which do not contain free phase product will be sampled and analyzed using appropriate EPA methods according to the following schedule:

Initially	Quarterly	Annually
BTEX PAH's Heavy Metals Cations/Anions	BTEX	BTEX PAH's Heavy Metals Cations/Anions

7. Quarterly Reports

Quarterly reports will be submitted to the OCD Santa Fe Office on February 1, May 1, August 1, and November 1 of each respective year with a copy provided to the OCD Artesia Office. The quarterly report will contain the following information:

- a. A summary of the laboratory analytic results of water quality sampling of monitor wells and the treatment system from the previous quarter. The data from each monitoring point will be presented in tabular form and will list past and present sampling results.
- b. A product thickness map based on the thickness of free phase product on ground water in all refinery monitor wells.
- c. The total volume of fluid pumped from the recovery trenches during the quarter and to date.
- d. The total volume of product recovered in the treatment system during the quarter and to date.
- e. The total volume of treated effluent applied to the irrigation system during the quarter and to date.

The first quarterly report will be due on November 1, 1994 and in addition to the above information will include the final as built construction details of the recovery system.

8. Product and Waste Disposal

All recovered product, waste filters, recovery system or treatment system waste products will be recycled and/or disposed of at an OCD approved facility.

9. Tank Berming

All above ground tanks used to contain fluids other than non-contaminated fresh water will be bermed such that they can contain one and one-third times the volume of the largest tank or all interconnected tanks.

10. Notification

Amoco will notify the OCD Santa Fe Office at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

May 31, 1994

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-111-334-118

Ms. Vanessa A. Harris Amoco Oil Company P.O. Box 7513 Chicago, Illinois 60680-7513

RE: HYDROCARBON CONTAMINATED GROUND WATER AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Ms. Harris:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's April 29, 1994 correspondence, April 1994 "PHASE III SUBSURFACE INVESTIGATION, ARTESIA PUMPING STATION, ARTESIA, NEW MEXICO" and April 1994 "PRELIMINARY CONCEPTUAL DESIGN, AMOCO PIPELINE STATION, ARTESIA, NEW MEXICO" which were received by OCD on May 4, 1994. These documents contain the results of Amoco's recent ground water investigations at the Artesia Pump Station and Amoco's plan for remediation of contaminated ground water.

The OCD has the following comments and requests for information regarding the above referenced documents:

A. Preliminary Conceptual Design

- 1. Amoco proposes to vertically install a liner along the back wall of the recovery trench to prevent migration of product. Please provide OCD with information on the type of liner to be used and how Amoco will prevent and or control ground water from surfacing over the top of the liner.
- Please provide the locations of all boreholes referenced in this document.
- 3. While the remedial concepts presented in this document are acceptable, Amoco's April 29, 1994 correspondence indicates that Amoco is continuing with the final remedial design while the OCD reviews these documents. OCD requests that Amoco provide OCD with the final design of the remediation system prior to approval.

Ms.Vanessa A. Harris May 31, 1994 Page 2

B. Phase III Subsurface Investigation Report

- 1. On Page 4 Amoco stated that hydrocarbon contaminated soils were stored temporarily onsite in 55 gallon drums prior to disposal. Please provide the OCD with the disposal facility to which these soils were taken.
- 2. Appendix D contains an analytical results sheet for a monitor well MW-15. Please provide the OCD with the location and well logs for this monitor well.
- 3. The well construction logs in Appendix C do not identify the water table elevation in relation to the well screen. Please provide the OCD with this information.

Submission of the above information will allow the OCD to complete a review of these documents. If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson

Hydrogeologist

Environmental Bureau

xc: OCD Artesia Office

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Amoco Oil Company

One Prudential Plaza 130 East Randolph Drive Post Office Box 7513 Chicago, Illinois 60680-7513 Engineering & Construction

April 29, 1994

Mr. William Olson Hydrogeologist New Mexico Oil Conservation Division Environmental Bureau 310 Old Santa Fe Trail Santa Fe, New Mexico 87501 RECEIVED

MAY 0 4 1994

OIL CONSERVATION DIV. SANTA FE

Re: Artesia Pumping Station - Phase III Subsurface Investigation

Dear Mr. Olson:

Enclosed are two copies of the Phase III Subsurface Investigation for the Artesia Pumping Station as well as two copies of the Preliminary Conceptual Design for remediation of the site. We will continue with final design while you are reviewing these documents to expedite the remediation.

If you have any questions or comments, please feel free to call me at (312) 856-7014. I look forward to hearing from you.

Sincerely yours,

Vanessa A. Harris, P.E. Remediation Coordinator

Remediation Services Division

cc:

Doug Earney Ray Banks

Greg Wurtz (w/o enclosure)

Artesia File: General





ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING

ANITA LOCKWOOD CABINET SECRETARY

March 9, 1994

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-667-241-905

Ms. Vanessa A. Harris Amoco Oil Company P.O. Box 7513 Chicago, Illinois 60680-7513

RE: INVESTIGATION OF HYDROCARBON CONTAMINATED GROUND WATER AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Ms. Harris:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's March 1, 1994 "AMOCO PIPELINE STATION - ARTESIA, NEW MEXICO SITE INVESTIGATION. This document contains Amoco's plan to perform additional soil borings and to install additional monitor wells to delineate the extent of ground water contamination related to Amoco's activities.

The investigation plan as contained in the above referenced document is hereby approved with the following conditions:

- 1. The monitor wells will be constructed in the same manner as the previous work plan which was approved by OCD on August 26, 1994 and shall have a minimum of 5 feet of well screen above the static water table and ten feet below the water table.
- 2. All boreholes not completed as monitor wells will be abandoned in the same manner as the previous work plan which was approved by OCD on August 26, 1994.
- 3. All ground water quality sampling will be conducted according to the procedures contained in the previous work plan which was approved by OCD on August 26, 1994.

Ms.Vanessa A. Harris March 9, 1994 Page 2

- 4. Amoco will notify OCD at least 72 hours in advance of all major investigation activities such that OCD may have the opportunity to witness the events and or split samples.
- 5. A report transmitting the results of the investigation will be submitted to OCD by May 1, 1994. The report will contain documentation of all investigation activities including locations of boreholes and monitor wells, monitor well construction details, lithologic logs, product thickness, analytical sampling results and a water table elevation map for the site.

Please be advised that OCD approval does not relieve Amoco of liability should the investigation fail to completely define the extent of contamination related to Amoco's activities. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson Hydrogeologist

Environmental Bureau

xc: Ray Smith, OCD Artesia Office

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

August 26, 1993

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-380

Mr. Raymond L. Banks
Amoco Pipeline Company
One Mid-America Plaza, Suite 300
Oakbrook Terrace, Illinois 60181-4450

RE: HYDROCARBON CONTAMINATED GROUND WATER AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Mr. Banks:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's July 9, 1993 "DELINEATION OF HYDROCARBON IMPACTED GROUND WATER - AMOCO PIPELINE COMPANY, ARTESIA STATION, EDDY COUNTY, NM" and the August 12, 1993 "ADDITIONAL INFORMATION FOR PRELIMINARY INVESTIGATION, AMOCO OIL STATION - ARTESIA, NEW MEXICO". These documents contain Amoco's plan to perform additional soil borings and to install monitor wells to define the extent of ground water contamination related to Amoco's activities. The documents also propose to recover free phase hydrocarbons by converting the existing monitor wells at the site into recovery wells.

The investigation plan as contained in the above referenced documents is hereby approved with the following conditions:

- 1. The monitor wells will be constructed with a minimum of 5 feet of well screen above the static water table.
- 2. In addition to the proposed benzene, toluene, ethylbenzene and xylene ground water quality sampling, ground waters from the monitor wells will also be sampled for polynuclear aromatic hydrocarbons using appropriate EPA laboratory methods.

Mr. Raymond L. Banks August 26, 1993 Page 2

3. A report containing the results of the investigation will be submitted to OCD by October 1, 1993.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson Hydrogeologist

Environmental Bureau

xc: OCD Artesia Office

Jeffery D. Bennett, Mittelhauser Corporation



STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

July 28, 1993

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-367

Mr. Raymond L. Banks
oco Pipeline Company
me Mid-America Plaza, Suite 300
Oakbrook Terrace, Illinois 60181-4450

RE: HYDROCARBON CONTAMINATED GROUND WATER AMOCO ARTESIA PUMPING STATION EDDY COUNTY, NEW MEXICO

Dear Mr. Banks:

The New Mexico Oil Conservation Division (OCD) is in the process of reviewing Amoco's July 9, 1993 "DELINEATION OF HYDROCARBON IMPACTED GROUND WATER - AMOCO PIPELINE COMPANY, ARTESIA STATION, EDDY COUNTY, NM". This correspondence states Amoco's intent to perform additional soil borings and to install monitor wells to define the extent of ground water contamination related to Amoco's activities. This document also proposes to recover free phase hydrocarbons by converting the existing monitor wells at the site into recovery wells.

The investigation concept presented is satisfactory. However, in order to complete a review of the above referenced proposal the OCD requires that Amoco submit the following information:

- The construction details for the proposed monitor wells.
- A sampling plan for soils and ground water from the boreholes
 and monitor wells.
- 3. Proposed abandonment procedures for boreholes which will not be completed as monitor wells.
- 4. The proposed disposition of fluids from the recovery wells.

Mr. Raymond L. Banks July 28, 1993 Page 2

5. A commitment for submission of a report containing the results of the investigation.

Amoco's July 9, 1993 correspondence was incorrectly mailed to the New Mexico Environment Department. Enclosed is my buisiness card containing the proper address for all correspondence in this matter. Please send the above information to the OCD at this address.

If you have any questions, please contact me at (505) 827-5885.

ncerely,

William C. Olson Hydrogeologist

Environmental Bureau

xc: OCD Artesia Office