

AP - 009

APPROVALS

YEAR(S):

2000-1999



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 4, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: Z-559-572-891

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-9)
HDO-90-23 SITE**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following EOTT Energy Pipeline Limited Partnership (EOTT) documents:

- November 29, 1999 "GROUND WATER ABATEMENT PLAN (AP-9), HDO-90-23, LEA CO., NEW MEXICO".
- September 30, 1999 "OLD TEXAS NEW MEXICO PIPELINE LEAKSITE HDO-90-23, LEA COUNTY, NEW MEXICO".
- September 1999 "ADDITIONAL SUBSURFACE INVESTIGATION REPORT AND STAGE 2 ABATEMENT PLAN, PIPELINE RELEASE SITE HDO-90-23, SECTION 6, TOWNSHIP 20 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO".

These documents contain the results of EOTT's Stage 1 Investigations, a Stage 2 Abatement Plan and proof of public notification for ground water contamination resulting from a crude oil pipeline spill at the HDO-90-23 site.

The above referenced Stage 2 Abatement Plan Proposal is **approved** with the following conditions:

1. In addition to the proposed quarterly benzene, toluene, ethylbenzene and xylene sampling, on an annual basis EOTT shall sample and analyze ground water from all monitor wells for concentrations of polynuclear aromatic hydrocarbons (PAH), major cations and anions, total dissolved solids (TDS), and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control (QA/QC).
2. All wastes generated will be disposed of at an OCD approved facility.

3. EOTT shall submit the annual report on all monitoring and remediation activities to the OCD by January 1 of each year. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain the following information:
 - a. A description of all remediation and monitoring activities which occurred during the past calendar year including conclusions and recommendations.
 - b. A quarterly water table map showing the location of the spill, pipeline, monitor wells and other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - c. Summary tables of all past and present ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - d. Summary tables of the quarterly free product thickness in each monitor well, the quarterly volume of free product recovered and the cumulative volume of free product recovered to date.
 - e. The results of all soil remediation and monitoring activities including copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - f. Isopleth maps for contaminants of concern at the site.
 - g. The disposition of all wastes generated.
4. EOTT shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit EOTT to the proposed work plan should the plan fail to remediate or monitor contamination related to EOTT's pipeline, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and 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: Chris Williams, OCD Hobbs District Office
Robert McCasland
Jesse Taylor, Environmental Technology Group, Inc.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

September 7, 1999

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-9)
HDO-90-23 SITE**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) September 2, 1999 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-9), HDO-90-23 SITE". This document contains EOTT's request for an extension of the deadline for submission of comprehensive report on the Stage 1 investigation activities related to ground water contamination resulting from a crude oil spill at EOTT's HDO-90-23 site.

The above referenced request to extend the report submission deadline from September 2, 1999 to October 2, 1999 **is approved.**

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office
Robert McCasland



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 2, 1999

CERTIFIED MAIL

RETURN RECEIPT NO: Z-274-520-679

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-9)
HDO-90-23 SITE**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following EOTT Energy Pipeline Limited Partnership (EOTT) documents:

- May 5, 1999 "ABATEMENT PLAN FOR SITE HDO-90-23, DISCHARGE PLAN GW-294 AND DISCHARGE PLAN GW-140, FORMERLY TEXAS NEW MEXICO PIPELINE".
- April 30, 1999 "TEXAS - NEW MEXICO PIPE LINE COMPANY, HDO-90-23, LEA COUNTY, NEW MEXICO, KEI JOB NO. 810005-1".
- March 11, 1999 "TEXAS - NEW MEXICO PIPE LINE COMPANY, HDO-90-23, LEA COUNTY, NEW MEXICO, KEI JOB NO. 810005-1".
- August 31, 1998 "STAGE 1 ABATEMENT PLAN, TNM-90-23, KEI JOB NO. 810005-1".

These documents contain EOTT's Stage 1 Abatement Plan for ground water contamination resulting from a crude oil spill at the Texas New Mexico Pipeline Company HDO-90-23 site which was recently purchased by EOTT.

The above referenced Stage 1 Abatement Plan Proposal is **approved** with the following conditions:

1. Each monitor well shall be constructed and completed as follows:
 - a. A minimum of 15 feet of well screen shall be installed with 5 feet of well screen placed above the water table and 10 feet of well screen placed below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen

- c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
 - e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
- 2. No less than 48 hours after the wells are developed, ground water from all monitor wells at each site will be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) major cations and anions, total dissolved solids (TDS), and New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control (QA/QC).
 - 3. All wastes generated during the investigation will be disposed of at an OCD approved facility.
 - 4. EOTT shall submit a comprehensive report on all site investigations to the OCD by September 2, 1999. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain the following information:
 - a. A comprehensive description of all past and present investigation activities including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table map showing the location of the spill, pipeline, monitor wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
 - d. Summary tables of all past and present ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - e. Isopleth maps for contaminants of concern at the site.
 - f. A map showing all land ownership and water wells within 1 mile of the site.
 - g. The disposition of all wastes generated.
 - h. A long term ground water monitoring plan.
 - 5. EOTT shall notify the OCD at least 24 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit EOTT to the proposed work plan should the investigation actions fail to adequately define the extent of contamination, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

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

Sincerely,



for Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office
Robert McCasland

Z 274 520 679

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PS Form 3800, April 1995