

AP - 012

**GENERAL
CORRESPONDENCE**

YEAR(S):
2005 - 1998



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

November 3, 2005

Ms. Camille Reynolds
Plains Pipeline
3112 West Highway 82
Lovington, NM 88260

RE: Plains Pipeline Soil Closure Request
TNM 98-05B
EMS No.: TNM 98-05B
Section 26, T21S, R37E
Lea County, New Mexico
NMOCD Ref.: AP-12

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the request, dated October 6, 2005, shown above. The soil phase of the remediation at this site may be closed.

NMOCD approval of soil closure does not relieve Plains Pipeline of liability should its operations at this site prove harmful to public health or the environment. Nor does it relieve Plains Pipeline of its responsibility to comply with the rules and regulations of any other local, state or federal governmental entity.

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.un

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Martin, Ed, EMNRD

From: Curt Stanley [cstanley@novatraining.cc]
To: Sheeley, Paul, EMNRD; Johnson, Larry, EMNRD; Martin, Ed, EMNRD
Cc: Camille Reynolds (Camille Reynolds); Todd Choban; Ryan Epley
Subject: FW: TNM-98-05B Activities
Attachments:

Sent: Thu 6/30/2005 2:29 PM

AP-12

Paul,

Thank you for the phone call this afternoon (6/30/05 @ 2 PM MDT). Per your verbal approval, NOVA will be plugging and abandoning MW-6 through MW-10 at the TNM-98-05B release site (see previous email) on Friday, July 1, 2005. We will also be collecting samples of backfilled soil placed in the excavation. At your request we will analyze these samples for BTEX, TPH and Chlorides.

Thank you,

Curt Stanley
 NOVA

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

From: Curt Stanley [mailto:cstanley@novatraining.cc]
Sent: Thursday, June 30, 2005 9:05 AM
To: Paul Sheeley (psheeley@state.nm.us); Larry Johnson (lwjohnson@state.nm.us)
Cc: Camille Reynolds (Camille Reynolds); Todd Choban (tchoban@novatraining.cc); Ryan Epley (repley@novatraining.cc); Curt Stanley (cstanley@novatraining.cc)
Subject: TNM-98-05B Activities

Paul / Larry

NOVA Safety and Environmental, on behalf of Plains Marketing, L.P. would like to plug and abandon Monitor Wells MW-6 through MW-10 at the TNM-98-05B Former Leak Site. This site is located in Section 26, Township 21 South, Range 37 East, in Lea County, New Mexico. The plugging and abandonment of these wells was approved by Mr. Ed Martin of the NMOCD, Santa Fe Office in a letter dated June 21, 2005. These wells will be plugged by a New Mexico licensed water well driller.

NOVA would also like to collect confirmation surface samples at the above mentioned site, as directed by Mr. Ed Martin

NOVA would like to commence these activities on **Friday, July 1, 2005.**

We understand that this notice is not a 48 hour advance notice, but request OCD permission to proceed on Friday, July 1, 2005.

Thank you for your consideration, If you have any questions or concerns please contact me or Camille Reynolds.

Curt Stanley
 NOVA



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

June 21, 2005

Ms. Camille Reynolds
Plains Marketing, L.P.
3112 West Highway 82
Lovington, NM 88260

Re: 2004 Monitoring Report
For the TNM 98-05B Site Located in the
NE/4 NW/4 of Section 26, Township 21 South, Range 37 East
Lea County, New Mexico
Plains EMS: TNM-98-05B-Known
NMOCD Reference: AP-012

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the report shown above, dated April 2005, prepared on behalf of Plains Marketing, L.P. (Plains) by Nova Safety and Environmental. This report is hereby accepted with the following understandings and conditions:

1. The NMOCD has approved the "Site Restoration Work Plan and Proposed Soil closure Strategy dated February 2005 by a letter dated June 2, 2005. Plains will now initiate field activities to complete the remedial actions as summarized in that work plan and restore surface conditions at the site. Upon completion of these activities, Plains will submit a soil closure report to the NMOCD Santa Fe office for approval.
2. The five monitor wells numbered MW-6 through MW-10 may be plugged and abandoned using a slurry containing 3% - 5% bentonite.
3. The five monitor wells numbered MW-1 through MW-5 will continue in the quarterly monitoring and reporting program.

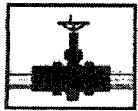
If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NMOCD acceptance does not relieve Plains of responsibility should its operations at this site prove to have been harmful to public health or the environment. Nor does it relieve Plain of its responsibility to comply with the rules and regulations of any other federal, state, or local governmental entity.

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

cc: NMOCD, Hobbs



PLAINS ALL AMERICAN

March 29, 2005

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains All American – Annual Monitoring Reports
21 Sites in Lea County, New Mexico

Dear Mr. Martin:

Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico Oil Conservation Division (NMOCD). In accordance with the rules and regulations of the NMOCD, Plains All American hereby submits our Annual Monitoring reports for the following sites:

LF-59	Section 32, Township 19 South, Range 37 East, Lea County
TNM 97-04	Section 11, Township 16 South, Range 35 East, Lea County
HDO 90-23	Section 06, Township 20 South, Range 37 East, Lea County
Darr Angell 2	Section 11, 14, Township 15 South, Range 37 East, Lea County
SPS 11	Section 18, Township 18 South, Range 36 East, Lea County
TNM 97-17	Section 21, Township 20 South, Range 37 East, Lea County
TNM 97-18	Section 28, Township 20 South, Range 37 East, Lea County
TNM 98-05A	Section 26, Township 21 South, Range 37 East, Lea County
Red Byrd # 1	Section 01, Township 20 South, Range 36 East, Lea County
Bob Durham	Section 31, 32, Township 19 South, Range 37 East, Lea County
Monument Site 11	Section 30, Township 19 South, Range 37 East, Lea County
Darr Angell 1	Section 11, Township 15 South, Range 37 East, Lea County
TNM 98-05B	Section 26, Township 21 South, Range 37 East, Lea County
Monument Site 2	Section 6, 7, Township 20 South, Range 37 East, Lea County
Monument Site 10	Section 32, Township 19 South, Range 37 East, Lea County
Monument Site 17	Section 29, Township 19 South, Range 37 East, Lea County
Monument Site 18	Section 07, Township 20 South, Range 37 East, Lea County
Monument Barber 10" PL	Section 32, Township 19 South, Range 37 East, Lea County
Darr Angell 4	Section 11, 02, Township 15 South, Range 37 East, Lea County
Monument to Lea 6"	Section 05, Township 20 South, Range 37 East, Lea County
Texaco Skelly "F"	Section 21, Township 20 South, Range 37 East, Lea County



**PLAINS
ALL AMERICAN**

Nova prepared these documents and has vouched for their accuracy and completeness, and on behalf of Plains All American, I have personally reviewed the documents and interviewed Nova in order to verify the accuracy and completeness of these documents. It is based upon these inquiries and reviews that Plains All American submits the enclosed Annual Monitoring Reports for the above 21 facilities.

If you have any questions or require further information, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds for CR

Camille Reynolds
Remediation Coordinator
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM

Enclosures

Martin, Ed, EMNRD**To...** Camille J Reynolds**Cc...****Bcc...****Subject:** RE: TNM 98-05B**Attachments:**

This sounds good. Let me know the analysis results.

Ed Martin

NMOCD

1220 S. St. Francis

Santa Fe, NM 87505

PH: (505) 476-3492

FA: (505) 476-3462

email: ed.martin@state.nm.us

Cell: (505) 690-0894

AP-12

From: Camille J Reynolds [mailto:cjreynolds@paalp.com]**Sent:** Mon 6/13/2005 9:14 AM**To:** Martin, Ed**Subject:** TNM 98-05B

Mr. Martin;

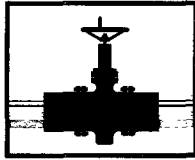
As per our phone conversation on Friday, June 10, 2005, concerning remediation activities to be conducted at the release site TNM 98-05B located in Section 26, T21S, R37E, in Lea County, New Mexico, the site was excavated and confirmation samples were obtained from the excavation. The analytical results of the soil samples collected indicated all the samples were below 100 ppm for TPH concentrations with the exception of the sample collected in the northeast quadrant of the floor of the excavation. Additional excavation activities were conducted in this area and a soil sample was submitted to be analysis for TPH and BTEX concentrations, analytical results indicated TPH and BTEX concentrations are below NMOCD guidelines. Nova on behalf of Plains will begin backfilling activities upon NMOCD approval. If you have questions or comments please contact me at 505-441-0965.

Thank you,

Camille Reynolds
Remediation Coordinator
Plains Pipeline

Attention:

The information contained in this message and/or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the Plains Service Desk at 713-646-4444 and delete the material from any system and destroy any copies.



PLAINS
MARKETING, L.P.

February 7, 2005

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RECEIVED
FEB 8 2005
Per

Re: Plains All American Site Restoration Work Plan
and Proposed Soil Closure Strategy
TNM 98-05A Release Site
Section 26, T21S, R37E
Lea County, New Mexico

AP-12

Dear Mr. Martin:

Please find attached for your approval a Site Restoration Work Plan and Proposed Soil Closure Strategy, dated December, 2004, for the TNM 98-05A release site located in the Section 26, T21S, and R37E in Lea County, New Mexico. The Site Restoration Work Plan and Proposed Soil Closure Strategy details site activities conducted to date and future activities for remediation and closure of the site.

Should you have any questions or comments, please contact me at (505) 441-0965.

Sincerely,

Camille Reynolds
Remediation Coordinator
Plains All American



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 6, 2005

Ms. Camille Reynolds
Plains Marketing, L.P.
3514 Lovington Hwy.
Hobbs, NM 88240

Re: TNM 98-05B Release Site
Section 26, T21S, R37E
Lea County New Mexico
NMOCD Ref. AP-0012

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the "Site Restoration Work Plan and Proposed Closure Strategy" report dated February 2005. In summary, the NMOCD understands the strategy to consist of the following:

1. Complete additional excavation of contaminated soils from the north wall, south wall, and bottom of the existing excavation.
2. Obtain grab samples from these areas and submit for laboratory analyses of TPH, GRO/DRO, and BTEX to ensure that all of the areas of the excavation are below NMOCD regulatory limits for these contaminants in soil.
3. If the contaminants in all walls and the bottom of the excavation test below NMOCD regulatory limits, backfill the excavation using the stockpiled soils. Any contaminated soils removed from the north wall, south wall, and bottom of the excavation in the action described in item #1 above will be blended with clean soil and spread last in the backfill procedure. The upper one foot of the backfill will be tilled until samples from this one foot depth have tested below NMOCD regulatory limits.
4. Monitor wells 6 through 10 are to be plugged and abandoned. Wells are to be plugged using a cement slurry containing 2% - 3% bentonite and cemented to the surface.

Plains Marketing L.P.'s plan components shown above are approved. After completion of these tasks, Plains will submit a "Soil Closure Report" as stated in section 5.0 of the subject report. This soil closure report will contain all analyses results referred to in the components above for the soils, and a notice to the NMOCD that the monitor wells referred to in item #4 have been plugged and abandoned per the procedure outlined in item #4.

Quarterly reports of soil tilling activities shown in item #3 above will be sent to the NMOCD, along with analyses of the top one foot of the former excavation, until this one foot depth tests below NMOCD regulatory limits. When all activities are complete, the NMOCD will issue a soils closure letter to Plains.

As acknowledged in your report, the groundwater at the site still needs to be addressed. Quarterly monitoring will continue until requirements of NMOCD Rule 19 are met.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read "Ed Martin".

Edwin E. Martin
Environmental Bureau

Cc: NMOCD, Hobbs



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

October 14, 2004

Mr. Jeffrey P. Dann
Plains All American L.P.
P.O. Box 4648
Houston, TX 77210-4648

TNM-9805A
AP-12

Dear Mr. Dann:

The New Mexico Oil Conservation Division (NMOCD) has received your letter, dated September 20, 2004, identifying the need for additional groundwater monitor and/or recovery wells at various sites. This request is hereby approved.

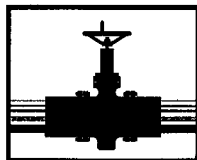
This approval does not relieve Plains Marketing, L.P. of any future liability at these sites should it prove that Plains' operations have caused harm to public health or the environment. Nor does it relieve Plains of its obligation to comply with the rules and regulations of any other governmental agency.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

Cc: Larry Johnson, NMOCD, Hobbs
Camille Reynolds, Plains, Midland



PLAINS

MARKETING, L.P.

September 20, 2004

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Plains Marketing, L.P. (formerly Link Energy) Remediation Sites
Various Locations in Lea County

Dear Mr. Martin:

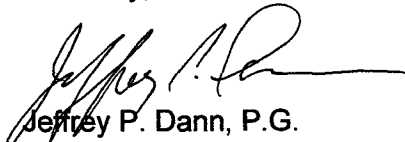
Based on the results of our ongoing groundwater monitoring and sampling program at several of our remediation and groundwater monitoring sites in Lea County, we have identified the need for additional groundwater monitor and/or recovery wells at the flowing sites.

Site Name	Plains EMS No.	Site Location	Number of Wells
Jct 34 to Lea	2002-10286	Section 21, T20S, R37E	3
Livingston Line-Bob McCasland	2001-11043	Section 3, T21S, R37E	2
Hugh Gathering	2002-10235	Section 11, T21S, R37E	1
C. S. Caylor	2002-10250	Section 6, T17S, R37E	5
Lovington Deep 6-Inch	2002-1-312	Section 6, T21S, R36E	6
Kimbrough Sweet	2000-10757	Section 3, T18S, R37E	2
8" Moore to Jal #1	2002-10270	Section 16, T17S, R37E	3
8" Moore to Jal #2	2002-10273	Section 16, T17S, R37E	3
Darr Angell #1	Darr Angell #1	Section 11, T15S, R37E	1
Darr Angell #4	2001-10876	Section 2/11, T15S, R37E	2
Red Byrd #1	Red Byrd #1	Section 1, T19S, R36E	5
HDO 90-23	HDO 90-23	Section 6, T20S, R37E	2
Monument 6" Pipeline	2001-11056	Section 5, T20S, R37E	3
Texaco Skelly F	2002-11229	Section 21, T20S, R37E	1
SPS-11	SPS-11	Section 18, T18S, R36E	2
Monument #11	TNM Mon #11	Section 30, T19S, R37E	2
Monument #2	TNM Mon #2	Section 6, T20S, R37E	1
Monument #17	TNM Mon #17	Section 29, T19S, R37E	1
Monument #18	TNM Mon #18	Section 7, T20S, R37E	2
98-05A	TNM 98-05A	Section 26, T21S, R37E	1
LF-59	LF-59	Section 32, T19S, R37E	2

The proposed well locations are illustrated on the attached site maps. Plains requests your approval of the proposed monitor well locations at the above-referenced sites. We anticipate commencement of drilling activities the week of October 4, 2004.

Should you have any questions or comments concerning this information, please contact me at (713) 646-4657.

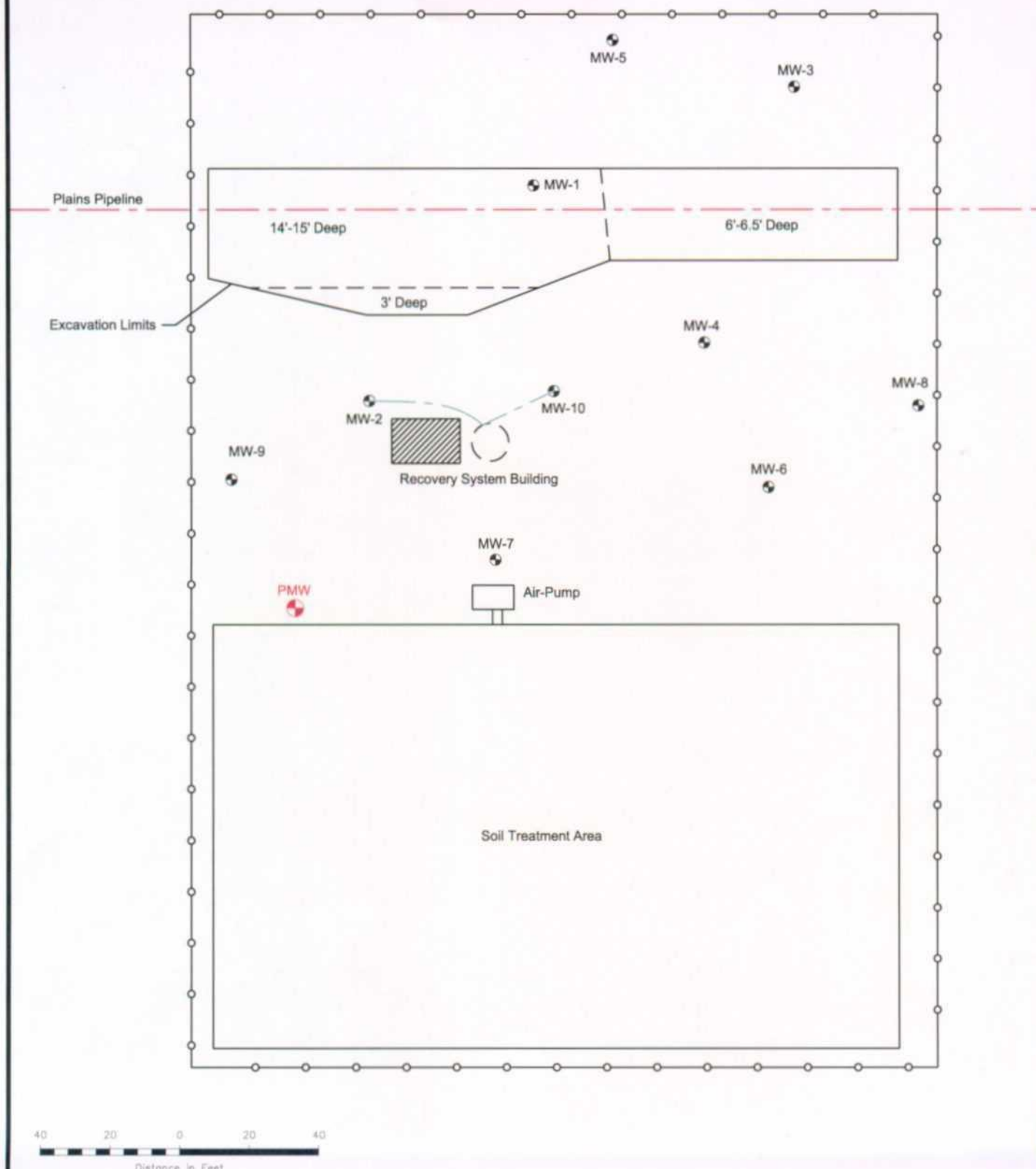
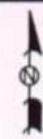
Sincerely,

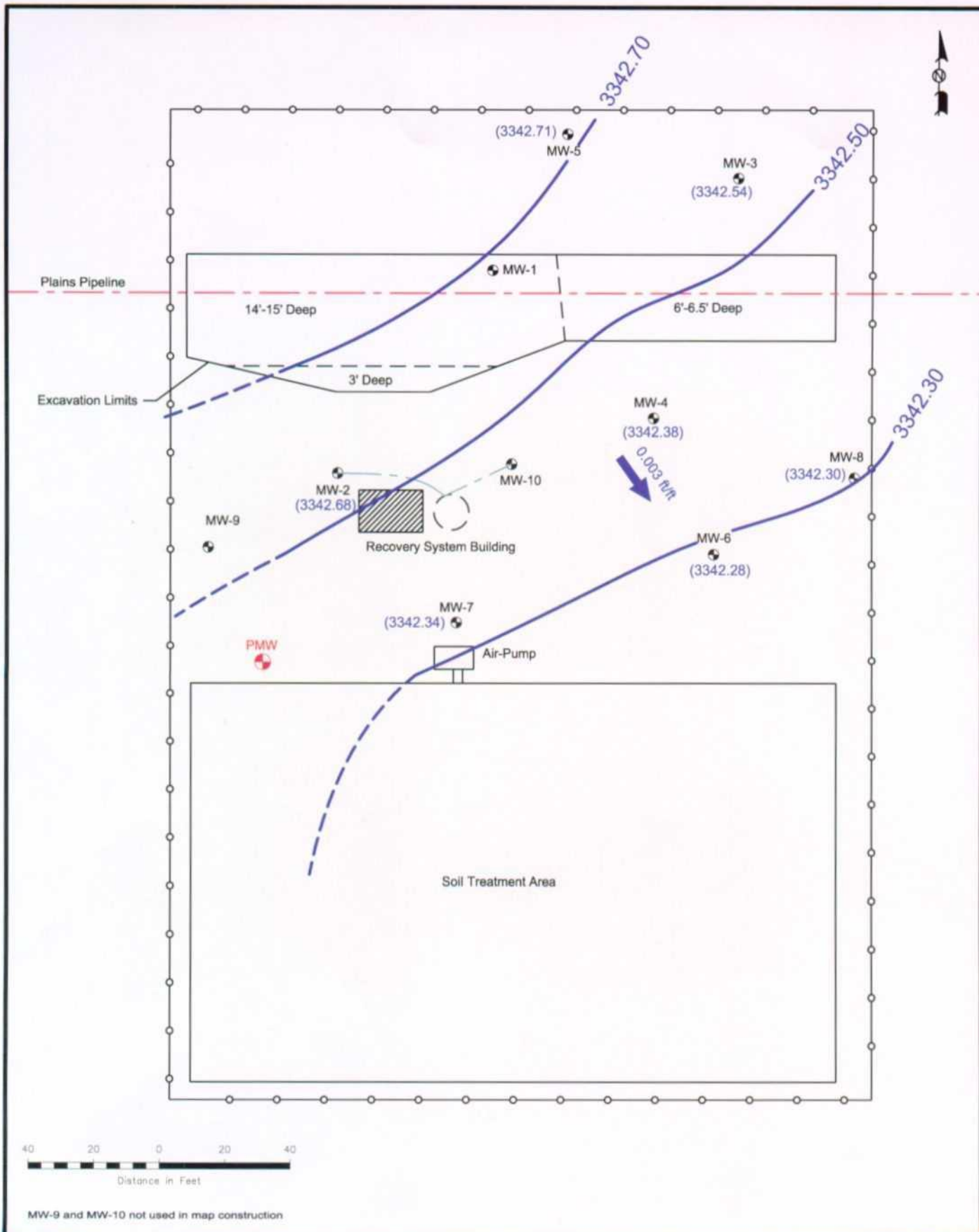


Jeffrey P. Dann, P.G.
Sr. Environmental Specialist
Plains All American

CC: Larry Johnson, NMOCD, Hobbs, NM
Camille Reynolds, Plains
Todd Choban, Nova
Pat McCasland, EPI

File: c:\jeff-files\OCD-DrillingSchOct2004





Legend: Monitor Well Location Fence Groundwater Elevation in Feet Groundwater Gradient Contour (0.2' Intervals) Groundwater Gradient Direction and Magnitude		Figure 2D Inferred Groundwater Gradient Map 11/07/03 Plains Pipeline, L.P. TNM98-05A Lea County, NM		NOVA Safety and Environmental NE1/4 NW1/4 Sec 26 T21S R37E 32° 27' 03.9"N 103° 08' 29.2"W Scale: 1" = 40' Prep By: CS Checked By: TKC March 26, 2004	
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Site Name: 98-05A

Remediation Plan: AP - 12

Company: EOTT

Contractor: ETGI

Date Inspected: September 25, 2003 by Ed Martin, Larry Johnson and Paul Sheeley

Soil treatment on site. Monitoring continuing.

Recommendation: Obtain latest sampling data for soil stockpile.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

December 7, 2000

CERTIFIED MAIL**RETURN RECEIPT NO: 5051-3921**

Mr. Glenn Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE**

Dear Mr. Waldrop:

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

- October 4, 2000 "NOTICE OF PUBLICATION, GROUND WATER ABATEMENT PLAN (AP-12), TNM-98-05A SITE, LEA COUNTY, NEW MEXICO".
- June 27, 2000 "PETROLEUM RELEASE SITE TNM 98-05A, NE1/4 NW1/4 SECTION 26, TOWNSHIP 21 SOUTH, RANGE 37 EAST, LEA COUNTY, ADDITIONAL INFORMATION REQUESTED FOR STAGE 1 ABATEMENT PLAN".
- January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12), TNM-98-5A SITE".

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 TNM-98-5A site.

The OCD has not received any response to the public notification of the Stage 1 Investigations and the Stage 2 Abatement Plan Proposal. 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.

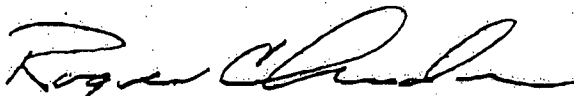
sampling, on an annual basis EOTT shall sample and analyze ground water from all monitor wells for concentrations of polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) metals.

2. All soil and ground water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC).
3. All wastes generated will be disposed of at an OCD approved facility.
4. EOTT shall submit an 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.
5. 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.

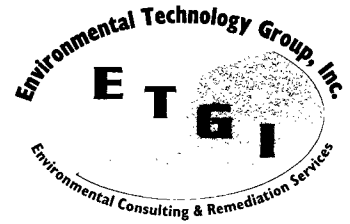
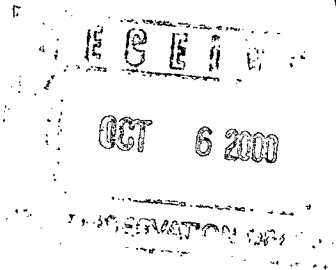
Sincerely,



Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office
Jesse Taylor, Environmental Technology Group, Inc.

October 4, 2000



Roger C. Anderson
Environmental Bureau Chief
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Notice of Publication
Groundwater Abatement Plan (AP-12)
TNM-98-05A-Site
Lea County, New Mexico

Dear Mr. Anderson:

In accordance with Oil Conservation Division Rule 19.G.(1).(a,b,c,d,e), written notice has been forwarded to the following persons and officials, identified by Rule 19 and the Director, who are required to be notified or who have requested notification. Enclosed are the Affidavits of Publication for Hobbs News-Sun, Albuquerque Journal, and Lovington Daily Leader and a copy of the Notice of Publication for your files.

If additional information is needed, please contact me at (505) 397-4882 or FAX (505) 397-4701.

Sincerely,

A handwritten signature in cursive script that reads "Beth A. Aldrich".

Beth A. Aldrich
Geologist

Attachments: Affidavit of Publication, Hobbs News-Sun
Affidavit of Publication, Albuquerque Journal
Affidavit of Publication, Lovington Daily Leader
Notice of Publication

Cc: State Land Office, Hobbs District
Chris Shuey, Southwest Research & Information Center
Director, State Park & Recreation
Marcia Simmons, KOAT-RV
Dr. Jay Sorenson
Bob Steele, Land & Mineral Resources
Westinghouse Electric Corp., Manager-Uranium Resources Div.
George Vlahos, Sierra Club
Lee Wilson & Associates
Secretary, New Mexico Environment Department
Thomas Kellahin
Director, Department of Game & Fish
Jackie Jennings, Core Laboratories, Inc.
Olson Plunck, Southwestern Public Service
Soil and Water Conservation Bureau
Environmental Affairs, Public Service Company
Governor, Pueblo of Laguna
State Engineer, Water Resources Division

NM Citizens, Clean Air & Water
William F. Carr, Campbell & Black
NM Municipal League
Jay Lazarus
Director, Water Resources Dept.
NM Water Well Association
Field Supervisor, US Fish & Wildlife Service
Patricia A. D'Andrea
Bruce S. Garber, Attorney at Law
Mike Matush, State Land Office Building
Science Applications, Inc.
Dr. Harry Bishara
Director, Albuquerque Environmental Health Department
John Draper, Montgomery & Andrews
Perry Pearce, Burlington Resources
Lynn Brandvold, NM Bureau of Mines & Mineral Resources
Kay Grotbeck
Jeanne Haffen, El Paso Natural Gas
Richard P. Chagnon, Hydrologist
Regional Forester, USFS Regional Office
Director, Colorado River Comm. of Nevada
Gerald R. Zimmerman, Colorado River Board of Calif.
Director, Division of Water Quality (Utah)
Jack A. Barnett, Colorado River Basin Ctrl. Forum
Chief, Groundwater Bureau (Santa Fe, NM)
Chief, Hazardous Waste Bureau (Santa Fe, NM)
Thomas W. Merlan, Director
Chester Rail
Ken Marsh, Controlled Recovery Inc.
Colin Adams, Environmental Counsel
Devon E. Jercinovic, International Technology Corp.
NM Oil & Gas Association
Len Oyunque, The Tewa Company
William Turner, New Mexico Trustee for Natural Resources
Glen Waldrop, EOTT Energy Pipeline Limited Partnership
Millard Deck Estate
Richard Don Jones
Charlie Bettis
Delrose Scott
George Wesley Weir
Tom Kennann
Earle Weddle
Mark W. Owen Estate
William Owen Stephens
James Edward Gardner
Richard G. Robinson
City of Eunice
Guadalupe Armendarez
Bob L. Lord
Allen R. Stoffer
James M. Conner
William M. Robinson
Mark Vinson
Robert P. Bustamante
Brent D. Brown
L. P. Falkner

Sammy R. Hodges
Billy M. Hodges
Johnston Construction Inc.
Martin Zamora
Curtis W. Blevins
Falcon Creek Resources Inc.
Lorn R. Brown
Randy Dunaway
Doug Stephens
James N. Smiley
David E. Gwinn
Mark A. Woodell
Richard Don Jones
Glen A. Teague
Patricia House
Lea County Commission
ETGI file

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of _____ 1 _____
_____ weeks.

Beginning with the issue dated

September 29 2000
and ending with the issue dated

September 29 2000

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 29th day of

September 2000

Jodi Benson

Notary Public.

My Commission expires
October 18, 2000
(Seal)

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

LEGAL NOTICE

September 29, 2000

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL

RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Con-
servation Division Regulations, the following Stage 2 Abate-
ment Plan Proposal has been submitted to the Director of the
Oil Conservation Division, 2040 South Pacheco, Santa Fe,
New Mexico, 87505. Telephone (505) 827-7131:

EOTT Energy Limited Partnership (EOTT), Glenn
Waldrop, Project Manager, Telephone (915)
684-3453, P.O. Box 1680, Midland, Texas, 79702,
has submitted a Stage 2 Abatement Plan Proposal for
the TNM 99-05A Leak Site, located northeast of
Eunice, New Mexico, in the NE 1/4, NW 1/4,
Section 26, Township 21 South, Range 37 East,
Lea County, New Mexico. EOTT operates a crude oil
pipeline at the site. Phase separated hydrocarbons
(PSH) have been observed on the ground water. The
Stage 2 Abatement Plan Proposal presents EOTT's
proposed methods for remediation of the site including
remediation of the contaminated soils; remediation of
contaminated ground water; site maintenance
activities; a monitoring and sampling plan for soils and
ground water; preparation of regular remediation
reports; and a schedule for implementation of all
remediation and monitoring activities.

Any interested person may obtain further information from the
Oil Conservation Division and may submit to the Director of the
Oil Conservation Division, at the address given above, written
comments or a written request for a public hearing that in-
cludes reasons why a hearing should be held. The Stage 1
Abatement Plan Proposal may be viewed at the above address
or at the Oil Conservation Division Hobbs District Office, 1625
N. French Drive, Hobbs, New Mexico, 88240, Telephone (505)
393-6161 between 8:00a.m. and 4:00p.m., Monday through
Friday. Prior to ruling on any Stage 2 Abatement Plan Propo-
sal, the Director of the Oil Conservation Division shall allow at
least thirty (30) days after the date of publication of this notice
during which written comments or a written request for a hear-
ing may be submitted.
#17648

01105268000

01543915

Environmental Technology Group

P.O. Box 4845

MIDLAND, TX 79704

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERAL & LAND
DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 2 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (800) 827-7151:

EOTT Energy Limited Partnership (EOTT), Glenn Waldrop, Project Manager, Telephone (915) 884-2452, P.O. Box 1080, Midland, Texas 79702, has submitted a Stage 2 Abatement Plan Proposal for the TMM 98-05A Leak Site, located northeast of Eunice, New Mexico, in the NE 1/4, NW 1/4, Section 26, Township 21 South, Range 37 East, Lea County, New Mexico. EOTT operates a crude oil pipeline at the site. Phase separated hydrocarbons (PHH) have been observed on the ground water. The Stage 2 Abatement Plan Proposal presents EOTT's proposed methods for remediation of the site including: installation of a monitoring network; installation of a designated ground water monitoring network; a monitoring and sampling plan for soils and ground water; preparation of regular remediation reports; and a schedule for implementation of all remediation and monitoring activities.

Any interested person may obtain further information from the Oil Conservation Division by submitting to the Director of the Oil Conservation Division, the above address, written comments or a written request for a public hearing that includes reasons why a hearing should be held. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division, Hobbs District Office, 2275 N. French Drive, Hobbs, New Mexico 88240. Telephone (505) 382-5267, Monday through Friday, 8:00 a.m. to 5:00 p.m. Any Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments or a written request for a hearing may be submitted.
 Journal: September 29, 2000

STATE OF NEW MEXICO
County of Bernalillo

SS

Bill Tafoya, being duly sworn, declares and says that he is Classified Advertising Manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for ONE times, the first publication being on the 29th day of September, 2000, and the subsequent consecutive publications on _____, 2000.

Sworn and subscribed to before me, a Notary Public, in and for the County of Bernalillo and State of New Mexico this 4th day of October of 2000.

PRICE \$32.12

Statement to come at end of month.

ACCOUNT NUMBER C85474

CLA-22-A (R-1/93)

OFFICIAL SEAL
Corrina Duncan
NOTARY PUBLIC
STATE OF NEW MEXICO

Commission Expires: 11/18/03

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertising Director of **THE LOVINGTON DAILY LEADER**, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Notice Of Publication

was published in a regular and entire issue of **THE LOVINGTON DAILY LEADER** and not in any supplement thereof, for one (1) day, beginning with the issue of September 28, 2000 and ending with the issue of September 28, 2000.

And that the cost of publishing said notice is the sum of \$ 46.69 which sum has been (Paid) as Court Costs.

Joyce Clemens
Subscribed and sworn to before me this 4th day of October 2000.

Debbie Schilling
Debbie Schilling
Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2002

87505 Telephone (505)
827-7131

EOTT Energy Limited Partnership (EOTT), Glenn Waldrop, Project Manager, Telephone (915) 684-3453, P.O. Box 1680, Midland, Texas, 79702.

has submitted a Stage 2 Abatement Plan Proposal for the TNM 98-05A Leak Site, located northeast of Eunice, New Mexico, in the NE 1/4, NW 1/4, Section 28, Township 21 South, Range 37 East, Lea County, New Mexico.

EOTT operates a crude oil pipeline at the site. Phase separated hydrocarbons (PSH) have been observed on the ground water. The Stage 2 Abatement Plan Proposal presents EOTT's proposed methods for remediation of the site including: remediation of the contaminated soils; remediation of contaminated ground water; site maintenance activities; a monitoring and sampling plan for soils and ground water; preparation of regular remediation reports; and a schedule for implementation of all remediation and monitoring activities.

Any interested person may obtain further information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that includes reasons why a hearing should be held.

The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division, Hobbs District Office, 1625 N. French Drive,

Hobbs, New Mexico, 88240. Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments or a written request for a hearing may be submitted.

Published in the Lovington Daily Leader, September 28, 2000.

LEGAL NOTICE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 2 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico,

Any interested person may obtain further information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that includes reasons why a hearing should be held. The Stage 1 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division, Hobbs District Office, 1625 N. French Drive,

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 2 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

EOTT Energy Limited Partnership (EOTT), Glenn Waldrop, Project Manager, Telephone (915) 684-3453, P.O. Box 1660, Midland, Texas, 79702, has submitted a Stage 2 Abatement Plan Proposal for the TNM 98-05A Leak Site, located northeast of Eunice, New Mexico, in the NE $\frac{1}{4}$, NW $\frac{1}{4}$, Section 26, Township 21 South, Range 37 East, Lea County, New Mexico. EOTT operates a crude oil pipeline at the site. Phase separated hydrocarbons (PSH) have been observed on the ground water. The Stage 2 Abatement Plan Proposal presents EOTT's proposed methods for remediation of the site including remediation of the contaminated soils; remediation of contaminated ground water; site maintenance activities; a monitoring and sampling plan for soils and ground water; preparation of regular remediation reports; and a schedule for implementation of all remediation and monitoring activities.

Any interested person may obtain further information from the Oil Conservation Division and may submit to the Director of the Oil Conservation Division, at the address given above, written comments or a written request for a public hearing that includes reasons why a hearing should be held. The Stage 1 Abatement Plan Proposal may be viewed at the the above address or at the Oil Conservation Division Hobbs District Office, 1625 N. French Drive, Hobbs, New Mexico, 88240, Telephone (505) 393-6161 between 8:00a.m. and 4:00p.m., Monday through Friday. Prior to ruling on any Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments or a written request for a hearing may be submitted.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

September 5, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-3549

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE
LEA COUNTY, NEW MEXICO**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) June 27, 2000 "PETROLEUM RELEASE SITE TNM 98-05A, NE1/4, NW1/4 SECTION 26, TOWNSHIP 21 SOUTH, RANGE 37 EAST, LEA COUNTY, ADDITIONAL INFORMATION REQUESTED FOR STAGE 1 ABATEMENT PLAN" which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc. This document contains the results of EOTT's Stage 1 soil and ground water investigations and a proposed Stage 2 Abatement Plan for soil and ground water contamination resulting from a crude oil pipeline spill at EOTT's TNM-98-5A site.

The Stage 1 investigation activities completed to date are satisfactory and the proposed Stage 2 Abatement Plan is administratively complete. Before the OCD can complete a review of the proposed Stage 2 Abatement Plan, the OCD requires that:

1. EOTT issue by September 20, 2000 the attached Stage 2 notice of publication in the Albuquerque Journal, the Hobbs News-Sun and the Lovington Daily Leader pursuant to OCD Rule 19.G.(2).
2. Prior to issuing public notice, EOTT shall issue written notice of the Stage 2 proposal pursuant to OCD Rule 19.G.(1). Please use the previously supplied 3.5" disk for a listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1).(d). The disk also contains the contact for the New Mexico Trustee for Natural Resources.

Please provide the OCD with proof of publication and proof of written notice as soon as possible upon completing issuance of the written and public notice.

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

Sincerely,

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

Roger C. Anderson
Environmental Bureau Chief

RCA/wco

xc: Chris Williams, OCD Hobbs District Office
Jesse Taylor, Environmental Technology Group, Inc.

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following Stage 2 Abatement Plan Proposal has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

EOTT Energy Pipeline Limited Partnership (EOTT), Glen Waldrop, Project Manager, Telephone (915) 684-3453, P.O. Box 1660, Midland, Texas 79702, has submitted a Stage 2 Abatement Plan Proposal for site TNM-98-5A, located approximately 2 miles northeast of Eunice, New Mexico in the NE 1/4, NW 1/4 of Section 26, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. EOTT operates a crude oil pipeline at the site. A spill of crude oil at the site resulted in soil and ground water contaminated with phase-separated hydrocarbon (PSH) and dissolved phase hydrocarbons. The Stage 2 Abatement Plan Proposal presents EOTT's proposal to abate pollution at the site by conducting the following activities: insitu chemical oxidation and bioremediation of contaminated soils, installation of a skimmer system for removal of PSH from ground water, natural attenuation of dissolved phase hydrocarbons in ground water, soil and ground water monitoring and preparation of regular reports summarizing remediation and monitoring activities and laboratory analytical results.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments and a written request for a public hearing on the merits of the proposal to the Director of the Oil Conservation Division at the address given above. The Stage 1 Report and Stage 2 Abatement Plan Proposal may be viewed at the above address or at the Oil Conservation Division Hobbs District Office, 1625 N. French Dr. Hobbs, New Mexico 88240, Telephone (505) 393-6161 between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed Stage 2 Abatement Plan Proposal, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which written comments may be submitted and a public hearing requested.



June 27, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

**RE: Petroleum Release Site TNM 98-05A
NE1/4 NW1/4 Section 26, Township 21 South, Range 37 East, Lea County
Additional Information Requested for Stage 1 Abatement Plan**

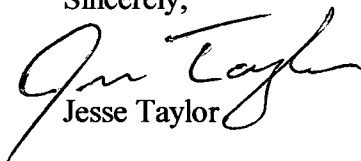
Dear Mr. Olson:

The following information regarding the referenced site is provided in response to your letter, dated April 21, 2000. These data were collected during field activities conducted by Environmental Technology Group, Inc. (ETGI) on behalf of EOTT Energy Corp. (EOTT). The inclusion of this data as an attachment should make the referenced document administratively complete.

- A geoprobe survey of the site was completed between March 29 and April 5, 2000. A total of 12 geoprobe points were advanced to refusal as depicted on the attached map in Attachment A. Boring logs for each point are also included as Attachment A. The soil laboratory data in tabulated form and the laboratory report are provided as Attachment B. The data indicate that impacted soil in the unsaturated zone is limited to the immediate pipeline right-of-way.
- The water well inventory is included as Attachment C. The survey indicates that there are no water wells within 1,000 feet of the site.
- The legal description of the site is as follows: NE1/4 NW1/4 Section 26, Township 21 South, Range 37 East.

If you have any questions or comments, please telephone me at (915) 664-9166.

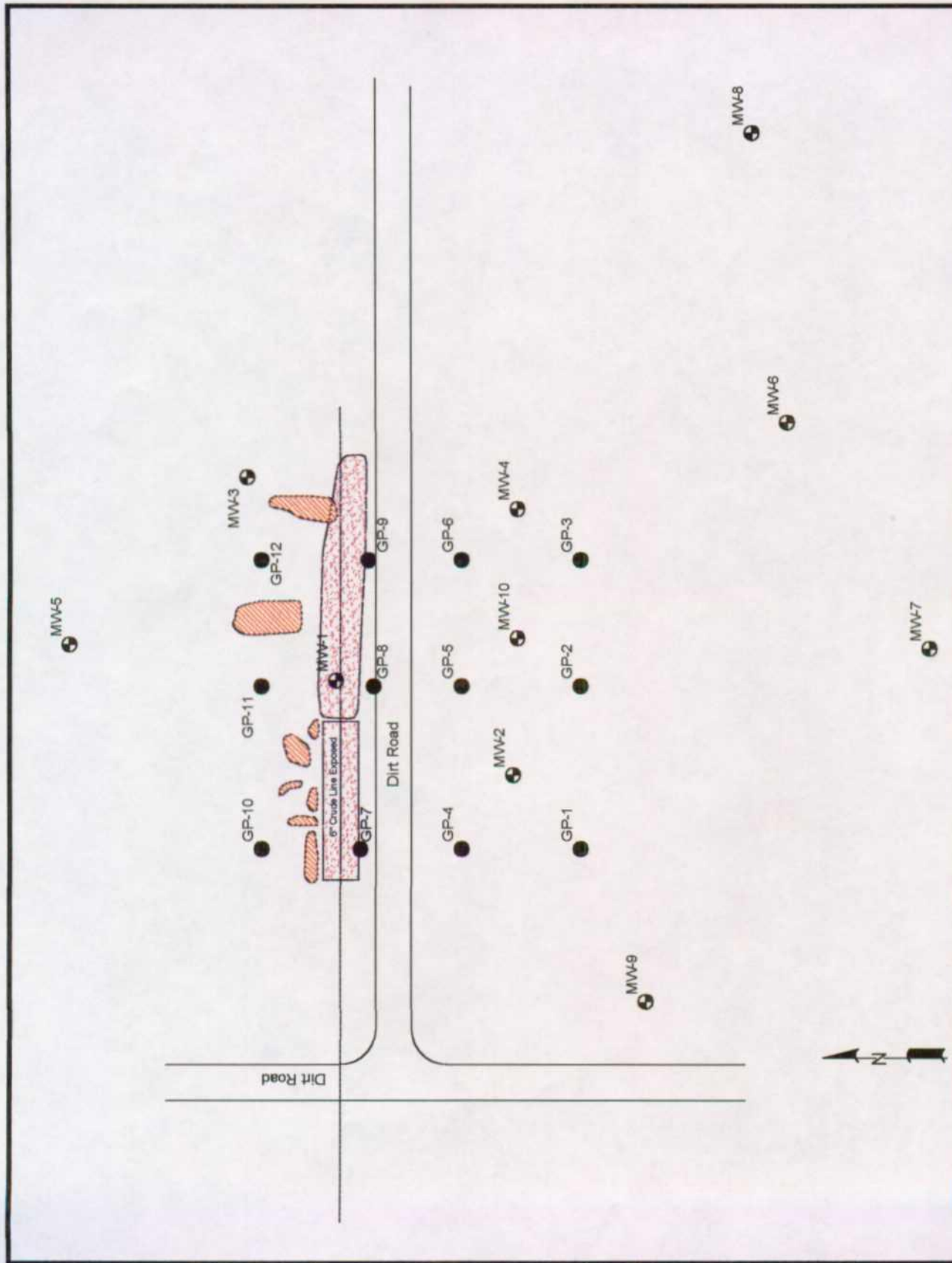
Sincerely;


Jesse Taylor

cc: Glenn Waldrop - EOTT Energy Corp.

ATTACHMENTS

ATTACHMENT A



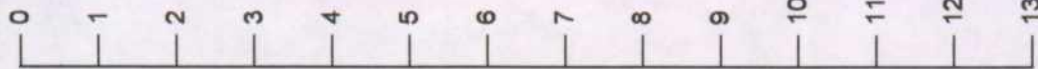
<p>LEGEND:</p> <ul style="list-style-type: none"> ● Existing Monitoring Wells ■ Stockpile Soil ■ Excavation Backfilled ● ETGI Geoprobe Locations 		<p>Figure 2 Site Map</p> <p>EOTT Energy Corp. TNM 98-05A Lea County, NM</p>	<p>Environmental Technology Group, Inc.</p> <p>Scale: 1" = 40' Prep By: JG Checked By: JH September 28, 1998 ETGI Project # EOT-0350</p>
--	--	---	--

Geoprobe GP-1

Geoprobe Details

Date Drilled 03/28/00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Depth
(feet)



Soil
Column

Soil Sample
Identification

PID
(ppm)

Notes

Soil Description

Light Brown sand, well sorted, very fine grained.

No odor
No stain

5.4

GP1-001

Brown sand, well sorted, medium grained.

No odor
No stain

6.3

GP1-002

Brown sand, well sorted, medium grained, interbedded with caliche nodules.

No odor
No stain

4.2

GP1-003

White, medium coarsed caliche.

No odor
No stain

5.1

GP1-004

Geoprobe
refusal

Geoprobe Log Details

Geoprobe GP-1

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology
Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2026C

Geoprobe GP-2

Geoprobe Details

Date Drilled 03/28/00
 Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

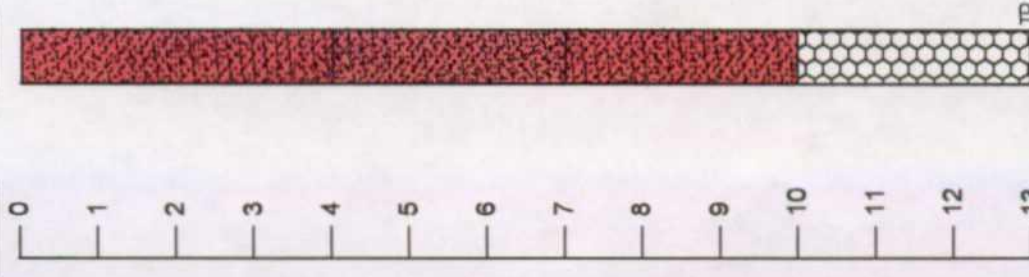
Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Brown sand, poorly sorted, dry.

No odor
No stain

5.7

GP2-001

Brown sand, well sorted, medium grained, dry.

No odor
No stain

5.0

GP2-002

Light Brown sand, well sorted, medium grained, dry, interbedded with abundant caliche nodules.

No odor
No stain

5.9

GP2-003

White, fine coarsed caliche mixed with small to medium gravel rocks.

No odor
No stain

6.8

GP2-004

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-2

EOTT Energy Corp. TNM 98-05A Lea County, NM

Environmental Technology Group, Inc.



Scale: NTS
 April 7, 2000
 Prep By: RS
 Checked By: JT
 ETGI Project # EOT 2029C

Geoprobe GP-3

Geoprobe Details

Date Drilled 03 / 30 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Brown sand, well sorted, very fine grained, dry.

No odor
No stain

7.8

GP3-001

Light Brown sand, well sorted, very fine grained, dry, interbedded with traces of caliche.

No odor
No stain

8.2

GP3-002

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-3

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2000C

Geoprobe GP-4

Geoprobe Details

Date Drilled 03 / 30 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

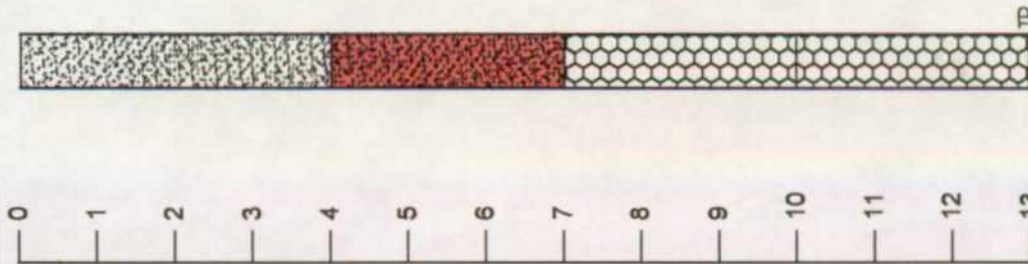
Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



White sand, well sorted, very fine grained, dry, interbedded with caliche throughout.

No odor
No stain

7.2

GP4-001

Brown sand, well sorted, medium grained, dry, with medium grained caliche rock.

No odor
No stain

6.2

GP4-002

White, medium grained caliche, caliche rock.

No odor
No stain

6.8

GP4-003

White, medium grained caliche, caliche rock.

No odor
No stain

5.2

GP4-004

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-4

EOTT Energy Corp. TNM 98-05A Lea County, NM

Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2026C



Geoprobe GP-5

Geoprobe Details

Date Drilled 03/31/00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

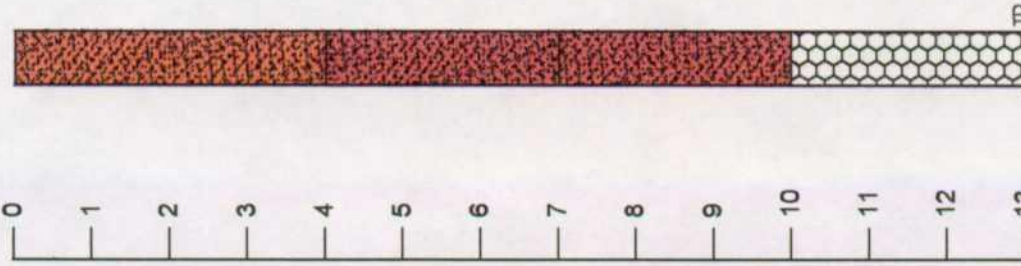
Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Tan sand, poorly sorted, dry, traces of caliche.

No odor
No stain

5.7

GP5-001

Brown sand, well sorted, medium grained, mixed with caliche.

No odor
No stain

7.2

GP5-002

Brown sand, well sorted, medium grained, mixed with caliche.

No odor
No stain

5.5

GP5-003

White, medium grained caliche, mixed with small to medium grained gravel rock.

No odor
No stain

4.2

GP5-004

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-5

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

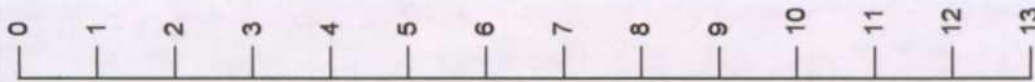
Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2028C

Geoprobe GP-6

Geoprobe Details

Date Drilled 03/31/00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Depth
(feet)



Soil
Column

Soil Sample
Identification

PID
(ppm)

Notes

Soil Description

GP6-001	3.9	No odor No stain	Light Brown sand, well sorted, very fine grained, dry, traces of caliche throughout.
GP6-002	6.7	No odor No stain	Brown sand, well sorted, very fine grained, dry.
GP6-003	5.9	No odor No stain	Brown sand, well sorted, medium grained, interbedded with caliche nodules.
GP6-004	8.9	No odor No stain	White, medium grained caliche.
		Geoprobe refusal	

Geoprobe Log Details

Geoprobe GP-6

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology
Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2028C

Geoprobe GP-7

Geoprobe Details

Date Drilled 04 / 05 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Depth (feet)

0
1
2
3
4
5
6
7
8
9
10
11
12
13

Soil Column



Soil Sample Identification

PID (ppm)

Notes

Soil Description

GP7-001
441
Slight odor
No stain
Light Brown sand, well sorted, very fine grained, moist, silty.

GP7-002
453
Slight odor
No stain
Brown sand, well sorted, medium grained, moist.

GP7-003
277
Strong odor
No stain
Brown sand, well sorted, medium grained, moist.

GP7-004
498
Strong odor
Strong stain
White, medium grained caliche.

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-7

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2028C

Geoprobe GP-8

Geoprobe Details

Date Drilled 04 / 05 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Tan sand, well sorted, very fine grained, moist, silty.

No odor
No stain

539

GP8-001

Light Tan sand, well sorted, very fine grained, moist, silty.

No odor
No stain

594

GP8-002

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-8

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2028C

Geoprobe GP-9

Geoprobe Details

Date Drilled 04 / 05 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

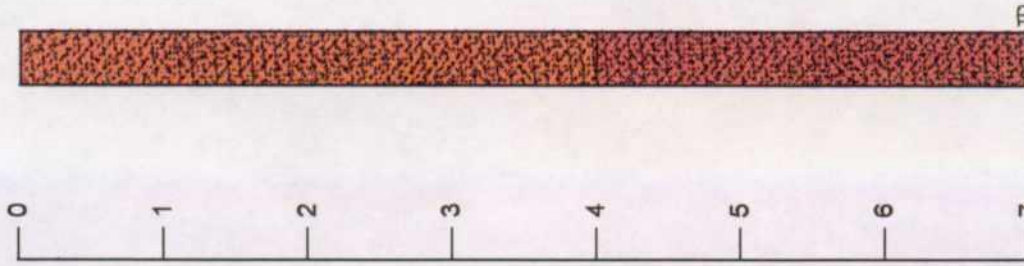
Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Tan sand, well sorted, fine grained, moist, silty.

No odor
No stain

606

GP9-001

Brown sand, well sorted, medium grained, moist, mixed with traces of caliche nodules.

No odor
No stain

545

GP9-002

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-9

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2026C

Geoprobe GP-10

Geoprobe Details

Date Drilled 04/05/00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

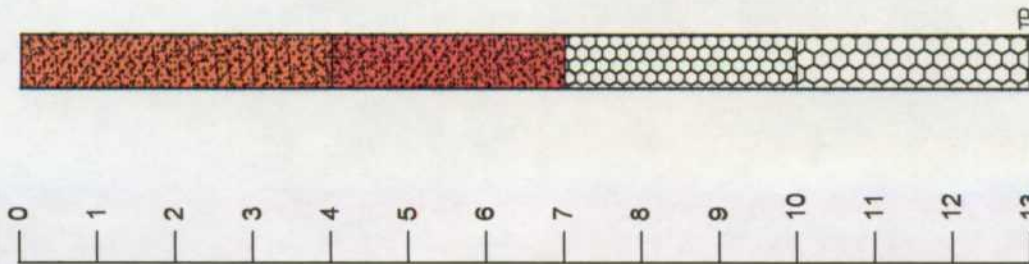
Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Tan sand, well sorted, fine grained, moist.

No odor
No stain

27.9

GP10-001

Light Brown sand, well sorted, medium grained, moist, interbedded with caliche nodules.

No odor
No stain

31.4

GP10-002

White, well sorted, fine grained, caliche.

No odor
No stain

21.3

GP10-003

White, medium grained caliche.

No odor
No stain

30.5

GP10-004

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-10

EOTT Energy Corp. TNM 98-05A Lea County, NM

Environmental Technology Group, Inc.


Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2028C



Geoprobe GP-11

Geoprobe Details

Date Drilled 04 / 05 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Depth (feet)	Soil Column	Soil Sample Identification	PID (ppm)	Notes	Soil Description
0		GP11-001	18.7	No odor No stain	Light Brown sand, well sorted, fine grained, wet.
1					
2					
3					
4					
5					
6		GP11-002	19.9	No odor No stain	Light Brown sand, well sorted, fine grained, moist, interbedded with caliche nodules.
7					
8					
9		GP11-003	22.8	No odor No stain	Brown sand, well sorted, medium grained, moist, mixed with medium grained caliche.
10					
11		GP11-004	34.6	No odor No stain	White, medium grained caliche.
12					
13				Geoprobe refusal	

Geoprobe Log Details

Geoprobe GP-11

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2000C

Geoprobe GP-12

Geoprobe Details

Date Drilled 04 / 05 / 00
Plugged - Surface to TD with Bentonite and hydrated with deionized water

Soil Description

Notes

PID (ppm)

Soil Sample Identification

Soil Column

Depth (feet)



Light Tan sand, well sorted, fine grained, wet, silty.

No odor
No stain

9.2

GP12-001

Brown sand, well sorted, medium grained, moist, mixed with traces of caliche nodules.

No odor
No stain

12.4

GP12-002

Geoprobe refusal

Geoprobe Log Details

Geoprobe GP-12

EOTT Energy Corp. TNM 98-05A Lea County, NM



Environmental Technology Group, Inc.

Scale: NTS
April 7, 2000
Prep By: RS
Checked By: JT
ETGI Project # EOT 2026C

ATTACHMENT B

TABLE 1

**SUMMARY OF SOIL CHEMISTRY
TNM 98-05A RELEASE SITE
LEA COUNTY, NM
ETGI PROJECT #EOT1026C**

SAMPLE LOCATION	SAMPLE DATE	SAMPLE DEPTH (feet)	Methods: EPA SW 846-8015M GRO/DRO	
			GRO C6-C10 (mg/kg)	DRO >C10-C25 (mg/kg)
GP-1	3/30/00	4'	<10	237
GP-1	3/30/00	7'	<10	34
GP-1	3/30/00	10'	<10	20
GP-1	3/30/00	13'	<10	13
GP-2	3/30/00	4'	<10	<10
GP-2	3/30/00	7'	<10	<10
GP-2	3/30/00	10'	<10	<10
GP-2	3/30/00	13'	<10	<10
GP-3	3/30/00	4'	<10	<10
GP-3	3/30/00	7'	<10	<10
GP-4	3/30/00	4'	<10	<10
GP-4	3/30/00	7'	<10	<10
GP-4	3/30/00	10'	<10	<10
GP-4	3/30/00	13'	<10	<10
GP-5	3/30/00	4'	<10	<10
GP-5	3/30/00	7'	<10	<10
GP-5	3/30/00	10'	<10	<10
GP-5	3/30/00	13'	<10	<10
GP-6	3/30/00	4'	<10	<10
GP-6	3/30/00	7'	<10	<10
GP-6	3/30/00	10'	<10	<10
GP-6	3/30/00	13'	<10	<10
GP-7	4/5/00	4'	9214	12885
GP-7	4/5/00	7'	13990	15878
GP-7	4/5/00	10'	3267	4587
GP-7	4/5/00	13'	6561	8555
GP-8	4/5/00	4'	16061	21804
GP-8	4/5/00	7'	16787	21022
GP-9	4/5/00	4'	2955	5423
GP-9	4/5/00	7'	17	307
GP-10	4/5/00	4'	<10	64
GP-10	4/5/00	7'	<10	16
GP-10	4/5/00	10'	<10	<10
GP-10	4/5/00	13'	<10	<10
GP-11	4/5/00	4'	<10	<10
GP-11	4/5/00	7'	<10	<10
GP-11	4/5/00	10'	<10	<10
GP-11	4/5/00	13'	<10	<10
GP-12	4/5/00	4'	<10	<10
GP-12	4/5/00	7'	<10	<10

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

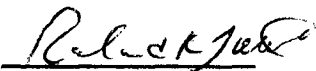
ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760
FAX: 970-461-1058

Sample Type: Soil
Sample Condition: Intact/Iced
Project #: EOT1026C
Project Name: TNM 98-05A
Project Location: Eunice, N.M.

Sampling Date: 03/30/00
Receiving Date: 03/31/00
Analysis Date: 04/04/00

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
24510	GP1-001 4'	<10	237
24511	GP1-002 7'	<10	34
24512	GP1-003 10'	<10	20
24513	GP1-004 13'	<10	13
24514	GP2-001 4'	<10	<10
24515	GP2-002 7'	<10	<10
24516	GP2-003 10'	<10	<10
24517	GP2-004 13'	<10	<10
24518	GP3-001 4'	<10	<10
24519	GP3-002 7'	<10	<10
24520	GP6-001 4'	<10	<10
24521	GP6-002 7'	<10	<10
24522	GP6-003 10'	<10	<10
24523	GP6-004 13'	<10	<10
24524	GP5-001 4'	<10	<10
24525	GP5-002 7'	<10	<10
24526	GP5-003 10'	<10	<10
24527	GP5-004 13'	<10	<10
24528	GP4-001 4'	<10	<10
24529	GP4-002 7'	<10	<10
24530	GP4-003 10'	<10	<10
24531	GP4-004 13'	<10	<10
% INSTRUMENT ACCURACY		90	97
% EXTRACTION ACCURACY		93	99
BLANK		<10	<10

Methods: EPA SW 846-8015M GRO/DRO


Raland K. Tuttle

4-12-00
Date

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

FAX #: 970-441-1038

Sampler Signature:

John Jones

LAB # (LAB USE ONLY)	FIELD CODE	# CONTAINERS	Volume/Amount	PRESERVATIVE METHOD		SAMPLING TIME
				MATRIX		DATE
					WATER	
					SOIL	
					AIR	
					SLUDGE	
					OTHER	
					HCL	
					HNO3	
					NONE	
					OTHER	

24S10	GP1-001	4'	402	X	X	3/20
24S11	GP1-002	7'	402	X	X	3/20
24S12	GP1-003	10'	402	X	X	3/20
24S13	GP1-004	13'	402	X	X	3/20
24S14	GP2-001	4'	402	X	X	3/20
24S15	GP2-002	7'	402	X	X	3/20
24S16	GP2-003	10'	402	X	X	3/20
24S17	GP2-004	13'	402	X	X	3/30
24S18	GP3-001	4'	402	X	X	3/30
24S19	GP3-002	7'	402	X	X	3/30
	GP3-003	10'	402	X	X	3/30

Relinquished by: <i>Juste Gormer</i>	Date: <i>3/30/00</i>	Times:	Received by:
Relinquished by:	Date:	Times:	Received by:
Relinquished by:	Date:	Times: <i>1630</i>	Received by Laboratory: <i>Wiley Kern</i>

FAX RESULTS ASAP!

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

\star $\frac{1}{3} \times 10^6$ \star
 \star 2.0×10^6 \star

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

FAX RESULTS ASAP!

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

ENVIRONMENTAL TECHNOLOGY GROUP, INC.
ATTN: MR. JESSE TAYLOR
P.O. BOX 4845
MIDLAND, TEXAS 79704
FAX: 915-520-4310
FAX: 505-392-3760

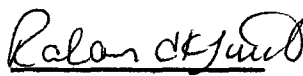
Sample Type: Soil
Sample Condition: Intact/Iced
Project #: EOT1026C
Project Name: TNM 98-05A
Project Location: Eunice, N.M.

Sampling Date: 04/05/00
Receiving Date: 04/06/00
Analysis Date: 04/07/00

ELT#	FIELD CODE	GRO C6-C10 mg/kg	DRO >C10-C28 mg/kg
24623	GP7 001 4'	9214	12885
24624	GP7 002 7'	13990	15878
24625	GP7 003 10'	3267	4587
24626	GP7 004 13'	6561	8555
24627	GP8 001 4'	16061	21804
24628	GP8 002 7'	16787	21022
24629	GP9 001 4'	2955	5423
24630	GP9 002 7'	17	307
24631	GP10 001 4'	<10	64
24632	GP10 002 7'	<10	16
24633	GP10 003 10'	<10	<10
24634	GP10 004 13'	<10	<10
24635	GP11 001 4'	<10	<10
24636	GP11 002 7'	<10	<10
24637	GP11 003 10'	<10	<10
24638	GP11 004 13'	<10	<10
24639	GP12 001 4'	<10	<10
24640	GP12 002 7'	<10	<10

% INSTRUMENT ACCURACY	99	103
% EXTRACTION ACCURACY	83	92
BLANK	<10	<10

Methods: EPA SW 846-8015M GRO/DRO


Raland K. Tuttle

4-12-00
Date

Environmental Lab of Texas, Inc. 12600 West I-20 East Odessa, Texas 79763 (915) 563-1800 FAX (915) 563-1713

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: <i>Jesse Taylor</i>		Phone #: 915-564-9164 FAX #: 505-392-3760		ANALYSIS REQUEST									
Company Name & Address: <i>ETOL</i>		Project Name: <i>TNM 98-07A</i>		TCLP Metals Ag As Ba Cd Cr Pb Hg Se TCLP Volatiles TCLP Semi Volatiles TDS RCI									
Project #: <i>ETOL</i>		Sampler Signature: <i>Jesse Taylor</i>		BTEX 8020/5030 TPH 402 <i>20.15 DRA/ERO</i>									
Project Location: <i>Ennis NM</i>		Matrix		PRESERVATIVE METHOD		SAMPLING							
		WATER		NONE		DATE							
		SOIL		ICE		TIME							
		AIR		HNO3									
		SLUDGE		OTHER									
		VOLUME/AMOUNT											
		# CONTAINERS											
		FIELD CODE											
LAB # (LAB USE ONLY)													

REMARKS

Relinquished by: <i>Jesse Taylor</i>	Date: <i>4/1/00</i>	Received by:	Time:
Relinquished by:	Date:	Received by:	Time:
Relinquished by:	Date:	Received by Laboratory: <i>Cheryl Kead</i>	Time: <i>16:00</i>

FA RESULTS ASAP

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

[illegible]

ATTACHMENT C

New Mexico Office of the State Engineer
Well Reports and Downloads

Township: Range: Sections:

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) ☐ Non-Domestic ☒ Domestic ☐ All

WELL DATA REPORT 06/26/2000

(acre ft per annum)		(quarters are biggest to smallest)									
DB File Nbr	Use	Diversion	Owner	Well Number	Tws	Rng	Sec	q	q	q	Zone
CP 00134	STK		MARION STEPHENS	CP 00134 DCL	21S	37E	24	1	1	1	
CP 00220	DOM		M. W. OWENS	CP 00220 DCL	21S	37E	25	3	1	1	
CP 00562	STK	3	JIMMIE D. WEIR	CP 00562	21S	37E	23	2	2	1	
CP 00700	MUL	3	WAYNE R. WALKER	CP 00700	21S	37E	23	2			92

Record Count: 4

PURPOSE OF USE CODES

<u>Use Code</u>	<u>Description</u>
AGR	AGRICULTURE OTHER THAN IRRIGATION
BPW	BRINE PRODUCTION WELL
COM	COMMERCIAL
CON	CONSTRUCTION
CPS	CATHODIC PROTECTION WELL
DAI	DAIRY OPERATION
DEW	DEWATERING WELL
DOM	72-12-1 DOMESTIC ONE HOUSEHOLD
EXP	EXPLORATION
FGP	FISH AND GAME PROPOGATION
FPO	FEED PEN OPERATION
HWY	HIGHWAY CONSTRUCTION
IND	INDUSTRIAL
INJ	INJECTION
IRR	IRRIGATION
MDW	COMMUNITY TYPE USE - MDWCA, PRIVATE OR COMMERCIAL SUPPLIED
MFG	MANUFACTURING
MIL	MILITARY - MILITARY INSTALLATIONS
MIN	MINING OR MILLING OR OIL
MOB	MOBILE HOME PARKS
MON	MONITORING WELL
MPP	MEAT PACKING PLANT
MUL	72-12-1 MULTIPLE DOMESTIC HOUSEHOLDS
MUN	MUNICIPAL - CITY OR COUNTY SUPPLIED WATER
NON	NON-PROFIT ORGANIZATIONAL USE
NOT	NO USE OF RIGHT OR POD
NRT	NO RIGHT
OBS	OBSERVATION
OFM	OIL FIELD MAINTENANCE
OIL	OIL PRODUCTION
POU	POULTRY AND EGG OPERATION
PPP	PETROLEUM PROCESSING PLANT
PRO	72-12-1 PROSPECTING OR DEVELOPMENT OF NATURAL RESOURCE
PUB	2-12-1 CONSTRUCTION OF PUBLIC WORKS
REC	RECREATION
SAN	72-12-1 SANITARY IN CONJUNCTION WITH A COMMERCIAL USE
SCH	SCHOOL USE - PUBLIC, PRIVATE, PAROCHIAL, & UNIVERSITIES
SRO	SECONDARY RECOVERY OF OIL
STK	72-12-1 LIVESTOCK WATERING
STO	STORAGE
SUB	SUBDIVISION
UTL	PUBLIC UTILITY



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

April 21, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-3006

Mr. Glen Waldrop
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
Midland, Texas 79702

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12), TNM-98-5A SITE". This document contains the results of EOTT's Stage 1 investigation of the extent of soil and ground water contamination related to a crude oil spill at EOTT's TNM-98-5A site located in Section 26, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. The document also contains EOTT's proposed Stage 2 plan for remediation of contaminated soil and ground water.

The OCD has identified the following deficiencies in the above referenced document and therefore the proposed plan is not administratively complete:

1. The document proposes to conduct additional geoprobe work to determine the extent of contaminated soils in the vicinity of the site of the leak prior to implementing the proposed Deep Remediation Injection System. However, the document does not contain specific information on how the geoprobe investigation will be conducted (ie. proposed geoprobe locations, sampling intervals, etc.). Please provide this information.
2. The document does not contain an inventory of all water wells inside and within one mile from the perimeter of the site. Please provide this information.
3. The legal description of the site in the document does not contain the $\frac{1}{4}$, $\frac{1}{4}$ location of the site within Section 26. Please provide this information.

NOTE: A review of a number of EOTT reports from other sites shows that $\frac{1}{4}$ $\frac{1}{4}$ location information is often not included in EOTT reports. Please include this information in all future reports.

The OCD requires that EOTT submit the above information to the OCD by May 22, 2000 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Will Olson".

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Jesse Taylor, Environmental Technology Group, Inc.

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

FEDERAL EXPRESS
AIR BILL # 8170 0342 3660

March 30, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

RE: **ANNUAL GROUND WATER MONITORING REPORTS**

Dear Mr. Olson:

Attached please find the 2000 Annual Groundwater Monitoring Reports for the following sites:

Monument #18	Monument #10
Monument #17	TNM-97-16 (Becky Jo Doom site)
Monument #2	HDO-90-23
Monument #15	SPS-11
TNM-97-17	TNM-98-02
TNM-97-18	TNM-98-S01
TNM-98-05A	TNM-97-23
TNM-96-16	TNM-95-10 (Saunders)
TNM-97-14	TNM-97-04 (Townsend)

I hope all meets with OCD requirements for closure of the site but if you have any questions, please don't hesitate to call me at 915/684-3467.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: Environmental File

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-3761

January 5, 2000

State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn: William Olson

RECEIVED

JAN 12 2000

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE**

Dear Mr. Olson:

As per your letter dated December 22, 1999, attached please find EOTT's additional Subsurface Investigation Report and Stage 2 Abatement Plan for the above captioned leaksite. This information should meet and/or exceed the requirements set out in your letter.

I hope all meets with OCD approval but if you have any questions, please don't hesitate to call.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

/attachments

cc: NMOCD - Hobbs



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-745

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

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) October 4, 1999 "ADDITIONAL DATA REQUIRED TO COMPLETE STAGE 1 ABATEMENT PLANS FOR THE FOLLOWING SITES: SPS-11 LEA COUNTY, NEW MEXICO; TNM-98-05A LEA COUNTY, NEW MEXICO; TNM-97-14 LEA COUNTY, NEW MEXICO; TNM-97-16 LEA COUNTY, NEW MEXICO; TNM-97-17 LEA COUNTY, NEW MEXICO; TNM-97-18 LEA COUNTY, NEW MEXICO". This document, which was submitted on behalf of EOTT by their consultant Environmental Technology Group, Inc., contains EOTT's work plans for installation of additional monitor wells at a number of EOTT crude oil pipeline spill sites

The above referenced work plan for the TNM-98-05A is not administratively complete since this document conflicts with the EOTT's prior July 12, 1999 proposed Stage 1 Plan Proposal and only contains partial information required under OCD Rule 19. The OCD requires that EOTT submit a single comprehensive Stage 1 Abatement Plan Proposal for the TNM-98-05A site pursuant to 19NMAC.15.A.19.E.3 which includes:

- a. Descriptions of the site, including a site map, and of site history including the nature of the release that caused the water pollution and a summary of previous investigations.
- b. A detailed site investigation work plan to define the site geology and hydrogeology, the vertical and horizontal extent and magnitude of vadose-zone and ground water contamination, the rate and direction of contaminant migration, and an inventory of water wells inside and within one mile from the perimeter of the site.

- c. A monitoring program, including sampling stations and frequencies, for the duration of the abatement plan.
- d. A quality assurance plan consistent with the sampling and analytical techniques listed in 20 NMAC.6.2.3017.B for all work to be conducted pursuant to the abatement plan.
- e. A schedule for all Stage 1 abatement plan activities, including the submission of a detailed final site investigation report to the OCD for approval.
- f. Any additional information necessary to design and perform an adequate site investigation.

The OCD requires that EOTT submit the above information to the OCD by January 27, 2000 with a copy provided to the OCD Hobbs District Office.

The OCD also requires that in the future EOTT submit separate work plans and reports for each site since some of the sites are being remediated under different rules and regulations

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Jesse Taylor, Environmental Technology Group, Inc.

EOTT ENERGY Pipeline Limited Partnership

P.O. BOX 1660
5805 E. BUSINESS 20
MIDLAND, TEXAS 79702
(915) 682-2761

October 15, 1999

State of New Mexico
Oil Conservation Division - Hobbs District Office
1625 N. French Dr.
Hobbs, NM 88240
Attn: Donna Williams

684-3400
RECEIVED

OCT 25 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

RE: Installation of Additional Monitor Wells in Lea County, NM

Dear Ms. Williams:

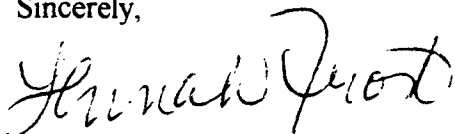
Below is a list of old Texas-New Mexico Pipeline sites that require additional monitor wells to be installed. Also on this list are 3 EOTT sites that require additional and/or new monitor wells.

TNM - SPS-11	TNM - 98-05A
TNM - 97-14	TNM - 97-16
TNM - 97-17	TNM - 97-18
EOTT - Darr Angell site #1	
EOTT - Darr Angell site #2	
EOTT - leak #TNM-LF-59	

We will begin drilling these wells on Monday, October 25, 1999 and will proceed from site to site on a geographic basis. The SPS-11 site is scheduled first. I will be out of town that week but Wayne Brunette will be coordinating drilling activity with our contractor Jerry Nickell and Allan Eades of Eades Drilling. Wayne's number is 915/556-0190. If you would like to be present at any of these installations, please contact Wayne to verify time and locations for each day's drilling.

Donna, I hope this meets with your approval but if you have any questions or need additional information, please don't hesitate to call me.

Sincerely,



Lennah Frost
Sr. Environmental Engineer

cc: William Olson - NMOCD - Santa Fe
Wayne Brunette
Glenn Waldrop

October 4, 1999

007 7 180



State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

BY CERTIFIED MAIL
RETURN RECEIPT NO.
Z 203 735 137

Attn: William Olson

RE: Additional Data Required to Complete Stage 1 Abatement Plans for the Following Sites:

- **SPS-11 Lea County, New Mexico**
- **TNM-98-05A Lea County, New Mexico**
- **TNM-97-14 Lea County, New Mexico**
- **TNM-97-16 Lea County, New Mexico**
- **TNM-97-17 Lea County, New Mexico**
- **TNM-97-18 Lea county, New Mexico**

Dear Mr. Olson:

EOTT Energy Corporation (EOTT) has requested that Environmental Technology Group, Incorporated (ETGI) assist them in field activities and the acquisition of additional data at the referenced sites. The additional field activities consist primarily in the completion of additional soil borings and/or ground water monitoring wells at these sites to either document soil and ground water conditions at the release point or define the lateral extent of ground water impact. In order to minimize cost and maximize efficiency, ETGI would like to conduct these similar tasks in sequence.

As such, on the behalf of EOTT, ETGI request the approval for the following work plans for each site. The work plans are designed to allow for the collection data required to complete a Stage 1 Abatement Plan for each site. In addition, a generalized summary of our Quality Assurance/Quality Control (QA/QC) Plan is provided as Attachment A. These protocol will be applicable to all the referenced sites.

Once the following work plans are approved, ETGI will initiate field activities within 14 days and complete the field work within 14 days subsequent to initiation. Individual Stage 1 Abatement Plans will be submitted to your agency within 60 days of the completion of the field work. Subsequent to your approval of each Stage 1 Abatement Plan, a Stage 2 Abatement Plan will be completed for each site within 60 days, or 120 days with good cause. Quarterly ground water monitoring, at all of the referenced sites, will continue as previously approved by your agency.

All of the sites are located in Lea County, New Mexico, which is situated in the southeast portion of the state. The area is located in the geologic province commonly known as the Permian Sedimentary Basin from which oil and gas are produced from various Permian and Pennsylvanian age Formations. Generally, all of the sites are located in sparsely populated, semi-arid terrain common to the basin. Topographically, the area ranges from flat to rolling hills or draws containing intermittent streams. Ground water at the sites range from 40 to 60 feet below the ground surface (bgs). The site locations are depicted on Figure 1 and individual site maps are provided in the subsequent figures, all of which are in Attachment B.

SPS-11

A review of the file for this site indicates that ground water samples, collected from down gradient monitoring well, MW-17, have contained benzene in excess of regulatory limits for several monitoring events. The soil and groundwater data indicate the possibility of multiple release events and locations. Regardless of the site's past release history, the down gradient extent of impacted ground water is currently not defined.

ETGI recommends the installation of an estimated three to five additional wells, located down gradient to monitoring well MW-17. The initial well will be placed approximately 200 feet southeast of monitoring well MW-17 and subsequent well locations will be based on field data collected from the initial well. The stated goal of the well placement selection will be to define the cross gradient and down gradient extent of the plume associated with monitoring well MW-17. A site map is provided as Figure 2.

TNM-98-05A

A review of the file for this site indicates that the four existing monitoring wells do not adequately define the extent of impacted soil, free phase product or dissolved phase hydrocarbons in the ground water. As much as 3.36 feet of product has been measured in monitoring well MW-2, which represents the most down gradient well in the western portion of the site. In addition, impacted soil was collected from the boring advanced for the well. Dissolved phase benzene concentrations, in excess of regulatory standards, have been detected in samples collected from monitoring well MW-4. This well represents the most down gradient well in the eastern portion of the site.

ETGI recommends that approximately eight geoprobe borings be advanced around the release point to more completely characterize the extent of impacted soil remaining subsequent to the excavation. An estimated minimum of five monitoring wells will be required to define the lateral extent of impacted ground water. These include:

- One - up gradient well, north of monitoring well MW-1;
- Two - cross gradient wells, west of monitoring well MW-2 and east of monitoring well MW-4; and

- Two - downgradient wells, south of monitoring well MW-2 and south of monitoring well MW-4.

Field data from the initial proposed wells may modify the exact locations, however, the stated purpose of the well location selection is to define the lateral extent of impacted ground water associated with the release. The proposed monitoring well points are depicted on Figure 3

TNM-97-14

A review of the file for this site indicates that there is no monitoring well located near the release point. ETGI recommends that one monitoring well be installed within 20 feet of the southwest corner of the excavation. If highly impacted soil is present in the boring, approximately four geoprobe borings will be installed in the area to determine the lateral extent of impacted soil remaining subsequent to the excavation. The proposed monitoring well location is depicted on Figure 4.

TNM 97-16

A geoprobe survey is under way at the site to determine the extent of impacted soil remaining subsequent to the excavation has been determined. ETGI recommends that one additional monitoring well be installed near the release point. In addition, a representative soil sample, from each 2,000 cubic yards of the land farm soil has been collected in order to characterize the present condition of the soil. The location of the proposed monitoring well is depicted on Figure-5.

TNM 97-17

A review of the file for this site indicates that there is no ground water monitoring well installed near the release point. ETGI recommends that one ground water monitoring well should be installed between soil boring SB-1 and the release point as depicted on Figure 6.

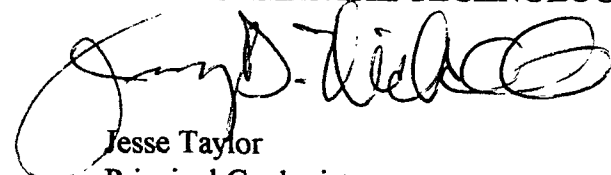
TNM 97-18

A review of the file for this site indicates that there is no ground water monitoring well installed near the release area and that ground water samples collected from down gradient well MW-3 exceed regulatory standards for dissolved phase benzene. ETGI recommends that one well should be installed in the release area and that two wells should be installed down gradient of monitoring well MW-3 as depicted on Figure 7.

If you have any questions or concerning any of the activities or scheduling proposed in this letter, please contact Lennah Frost, of EOTT Energy Corp. at (915) 684-3467.

Sincerely:

ENVIRONMENTAL TECHNOLOGY GROUP, INC.



Jesse Taylor
Principal Geologist

cc: Lennah Frost - EOTT Energy Corporation

Attachment

ATTACHMENT A

ETGI QA/QC PROCEDURES

Soil Sampling

Samples of subsurface soils will be obtained utilizing either a split spoon sampler (air rotary drilling rig) or a two inch, continuous sampling tube with a clean polybuterate liner (geoprobe). Representative soil samples will be divided into two separate portions using clean, disposable gloves and clean sampling tools. One portion of the soil sample will be placed in a disposable sample bag. The bag will be labeled and sealed for head-space analysis using a photo-ionization detector (PID) calibrated to a 100 ppm isobutylene standard. Each sample will be allowed to volatilize for approximately thirty minutes at ambient temperature prior to conducting the analysis.

The other portion of the soil sample will be placed in a sterile glass container equipped with a Teflon-lined lid furnished by the analytical laboratory. The container will be filled to capacity to limit the amount of head-space present. Each container will be labeled and placed on ice in an insulated cooler. Upon selection of samples for analysis, the cooler will be sealed for shipment to the laboratory. Proper chain-of-custody documentation will be maintained throughout the sampling process.

Soil samples will be delivered to Environmental Lab of Texas, Inc. in Midland, Texas for BTEX and TPH analyses using the methods described below. Soil samples will be analyzed for BTEX and TPH-DRO within fourteen days following the collection date.

The soil samples will be analyzed as follows:

- BTEX concentrations in accordance with EPA Method 8020, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

Ground Water Sampling

Monitoring wells will be developed and purged with a clean PVC bailer. The bailer will be cleaned prior to each use with Liqui-Nox detergent and rinsed with distilled water. Monitoring wells with sufficient recharge will be purged by removing a minimum of three well volumes. Monitoring wells that do not recharge sufficiently will be purged until no additional ground water can be obtained.

After purging the wells, ground water samples will be collected with a disposable Teflon sampler and polyethylene line by personnel wearing clean, disposable gloves. Ground water sample containers will be filled in the order of decreasing volatilization sensitivity (i.e., BTEX containers will be filled first and PAH containers second).

Ground water samples collected for BTEX analysis will be placed in 40 ml glass VOA vials equipped with Teflon-lined caps. The containers will be provided by the analytical laboratory. The vials will be filled to a positive meniscus, sealed, and visually checked to ensure the absence of air bubbles.

Ground water samples collected for PAH analysis will be filled to capacity in sterile, 1 liter glass containers equipped with Teflon-lined caps. Ground water samples collected for metals analysis will be filled to capacity in sterile, 1 liter plastic containers equipped with Teflon-lined caps. The containers will be provided by the analytical laboratory.

The filled containers will be labeled and placed on ice in an insulated cooler. The cooler will be sealed for transportation to the analytical laboratory. Proper chain-of-custody documentation will be maintained throughout the sampling process.

The ground water samples will be analyzed as follows:

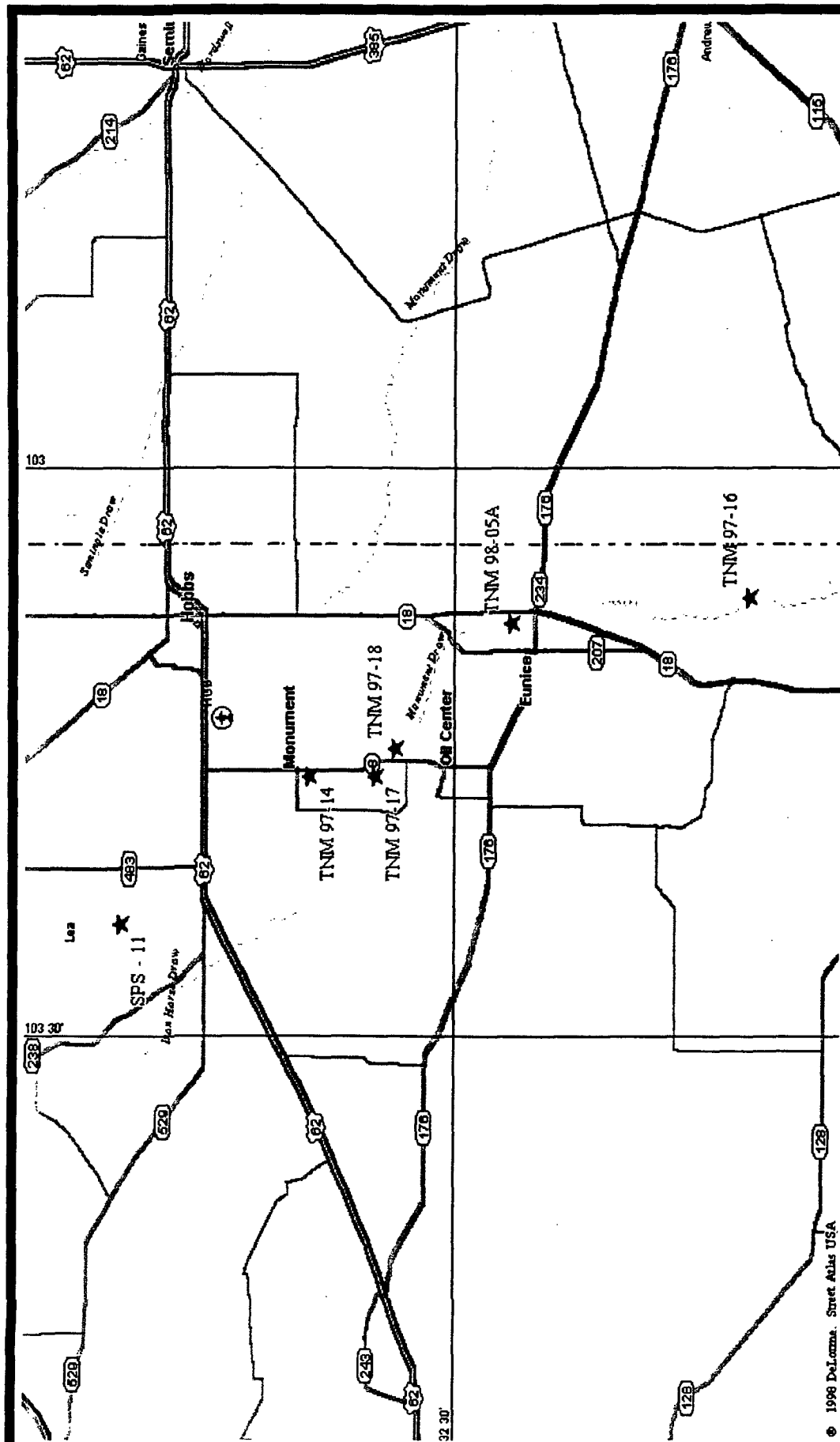
- BTEX concentrations in accordance with EPA Method 8020, 5030
- TPH concentrations in accordance with modified EPA Method 8015-GRO/DRO

Decontamination Of Equipment

Cleaning of drilling equipment will be the responsibility of the drilling company. In general, the cleaning procedures will consist of using high pressure steam to wash the drilling and sampling equipment prior to drilling and prior to starting each hole. Prior to use, the sampling equipment will be cleaned with Liqui-Nox detergent and rinsed with distilled water.

Laboratory Protocol

The laboratory will be responsible for proper QA/QC procedures. These procedures will either be transmitted with the laboratory reports or on file at the laboratory.



© 1996 DeLoma. Street Atlas USA

FIGURE 1

Not To Scale

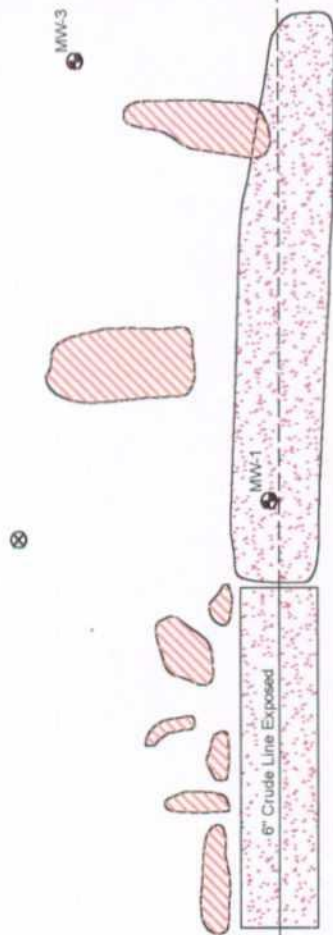
Referenced Site Locations

Lea County, NM

Environmental
Technology Group,
INC.

9 - 28 - 99 RS

Dirt Road



Dirt Road



LEGEND:

- Existing Monitoring Wells
- ⊗ Proposed Ground Water Monitoring Well Locations

Stockpile Soil



Excavated Area



Figure 3
Site Map

TNM 98-05A
Lea County, NM

Environmental Technology
Group, INC.

Scale: 1" = 25'	Prep By: RS	Checked By:
September 28, 1999	ETGI Project #	



STATE OF NEW MEXICO
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-274-520-703

Ms. Lennah Frost
EOTT Energy Pipeline Limited Partnership
P.O. Box 1660
5805 E. Business 20
Midland, Texas 79702

**RE: STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12)
TNM-98-5A SITE**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) July 12, 1999 "TNM-98-05A GROUNDWATER ABATEMENT PLAN (AP-12)". This document contains EOTT's proposed Stage 1 abatement plan for soil and ground water contaminated as a result of a crude oil pipeline release at the TNM-98-5A site.

The above referenced document is deficient because it does not contain:

1. A plan for investigation of the extent and magnitude of ground water contamination in excess of the abatement standards of OCD Rule 19.B.
2. A ground water monitoring plan.
3. A plan for monitoring progress and determining completion of the proposed insitu soil remediation.
4. A quality assurance/quality control plan for all soil and ground water quality sampling activities.
5. The composition or chemical constituents of the materials proposed to be injected to promote insitu bioremediation of soils. It is also not clear whether EOTT proposes to inject these materials into the ground water.

6. The intended use of the work plan. In a recent conversation, you indicated that EOTT intends that the above submittal be both a Stage 1 Investigation Plan and a Stage 2 Remediation Plan. Please clarify the intent of the currently submmitted plan. If this plan is both a Stage 1 and a Stage 2 work plan, the plan does not contain a plan for remediation of contaminated ground water.

The OCD requires that EOTT submit the above information to the OCD by September 30, 1999 with a copy provided to the OCD Hobbs District Office.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson", written over a horizontal line.

William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

May 12, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-655

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

RE: TNM-98-5A GROUND WATER ABATEMENT PLAN (AP-12)

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) understands that the EOTT Energy Pipeline Limited Partnership (EOTT) is the current operator of the above referenced pipeline site which was previously operated by the Texas-New Mexico Pipe Line Company (TNMPLC). The OCD has reviewed TNMPLC's March 5, 1999 "SUBSURFACE INVESTIGATION REPORT, TNM-98-05A, UNIT E, SECTION 26, TOWNSHIP 21 SOUTH, RANGE 37 EAST, LEA COUNTY, NEW MEXICO, KEI JOB NO. 810060-1" which was submitted on behalf of TNMPLC by their consultant KEI. This document contains the results of TNMPLC's installation of a ground water monitoring wells at the TNM-98-5A crude oil pipeline spill site.

A review of the above referenced report shows that ground water at the site is contaminated with free phase hydrocarbons as a result of the crude oil spill. Pursuant to 19 NMAC 15.A.19.C.1, the OCD requires an abatement plan for the TNM-98-5A site to abate ground water pollution. To initiate the abatement plan process, the OCD requires that EOTT submit to the OCD by July 12, 1999 a Stage 1 Investigation Proposal pursuant to OCD Rule 19.E.1. and 19.E.3. The Stage 1 Investigation Proposal shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The Stage 1 Abatement Plan Proposal shall include proof of written notice pursuant to OCD Rule 19.G.(1). A listing of "those persons, as identified by the Director, who have requested notification" pursuant to OCD Rule 19.G.(1)(d) will be provided after EOTT submits a written notification proposal.

If you have any questions, 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
Monica Slentz, KEI

Z 274 520 655

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5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3765 FAX

March 5, 1999

Mr. Tony Savoie
TEXAS - NEW MEXICO PIPE LINE COMPANY
P.O. Box 1030
Jal, New Mexico 88252

RECEIVED

MAR 10 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Subsurface Investigation Report
TNM-98-05A
Unit E, Section 26, Township 21 South, Range 37 East
Lea County, New Mexico
KEI Job No. 810060-1

Dear Mr. Savoie:

Transmitted with this letter is the Subsurface Investigation Report for the installation of 4 monitoring wells at the referenced site. Please review the report and contact me or Theresa Nix at (210) 680-3767 if you have any questions.

Respectfully,

A handwritten signature in cursive script that reads 'Monica Slentz'.

Monica Slentz
Project Manager

Enclosure

cc: Marc Oler; Equilon
Bill Olson, OCD Santa Fe
OCD Hobbs



5309 Wurzbach, Suite 100
San Antonio, Texas 78238
(210) 680-3767
(210) 680-3763 FAX

NOV 9 1998

November 5, 1998

Mr. Roger Anderson
STATE OF NEW MEXICO
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Texas-New Mexico Pipe Line Company
Pipe Line Release Site No. TNM-98-05A
NW/4 Section 26, Township 21 South, Range 37 East
Lea County, New Mexico
Job No. 810060-1

Dear Mr. Anderson:

This letter provides written notification of the apparent discovery of hydrocarbon impact to ground water at the above referenced site during soil remediation activities.

On November 3, 1998, apparent hydrocarbon impact to ground water was observed during soil boring installation in hydrocarbon-impacted soil at the referenced site, which is located in the NW/4 Section 26, Township 21 South, Range 37 East in Lea County, New Mexico. I notified William Olson at your office by email on November 4, 1998, of this discovery.

TNMPL has installed 4 monitoring wells at the site to further characterize the nature and extent of hydrocarbon impact to ground water. A report summarizing this additional work will be provided to OCD upon its completion. TNMPL expects to reach closure at this site within one year.

If you have any questions please contact me at (210) 680-3767.

Respectfully,

Theresa Nix
Project Manager

cc: Tony Savoie, Equilon
OCD Hobbs District Office

Olson, William

From: theresa.nix@keic.com[SMTP:theresa.nix@keic.com]
Sent: Wednesday, November 04, 1998 2:50 PM
To: Olson, William
Subject: TNM-98-05A (KEI Job No. 810060-1-0)

Bill Olson,
Please accept this message as notification that apparent ground water impact
has been observed at the following site:

TNM-98-05A
NW/4, Section 26, Township 21 South, Range 37 East
1 mile northeast of Eunice, NM

KEI installed a soil boring the soils appeared to be impacted to ground
water. Ground water appears to be approximately 45' - 50' below ground
surface. KEI is installing 4 monitoring wells at the site and will forward
all assessment results to your office. This site is expected to be cleaned
to closure levels within 1 year.

I will forward a written notice to you tomorrow. Please call me at
210-680-3767 if you have any questions.

Thanks!
Theresa Nix