

AP - 016

**GENERAL
CORRESPONDENCE**

YEAR(S):
2004-2000



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Joanna Prukop
Cabinet Secretary
Acting Director
Oil Conservation Division

May 18, 2004

William Kendrick
Enron Pipeline Services Company
1400 Smith Street
Houston, TX 77002

Re: Abatement Plan (AP-16) Bob Durham (Your letter to Mr. Roger C. Anderson of the New Mexico Oil Conservation Division, dated November 7, 2002)

Dear Mr. Kendrick:

Thank you for your response, and I apologize for the tardiness of my reply. Your letter satisfactorily explains the discrepancies in your original Stage II abatement plan.

We agree with your assessment of the situation on the Bob Durham (and also the Jimmy B. Cooper) site in Sections 29 and 32. We believe that a conference between your company and NMOCD would result in workable plans to address the environmental issues at stake. In any event, a revised Stage II Abatement Plan is required for the Bob Durham site. This revised plan must address some of the concerns expressed in the Heidel, Samberson, et al. letter dated August 2, 2002. Please call if you have questions.

Your letter states that EPSC will submit a summary report to the NMOCD and Jimmy B. Cooper no later than December 15, 2002. Has this been done? If so, NMOCD does not have a copy of that summary. Please forward this information to me by June 15, 2004.

As I have stated in paragraph 2, a meeting or conference call seems to be in order. Please contact me so that we can set up such a meeting.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

cc: Chris Williams, NMOCD, Hobbs, NM
Larry Johnson, NMOCD, Hobbs, NM
Camille Reynolds, ETGI

Site Name: Bob Durham Site

Remediation Plan: AP-16

Company: EOTT

Contractor: ETGI

Date Inspected: September 24, 2003 by Ed Martin, Larry Johnson and Paul Sheeley

32 – 33 monitor wells on site. 8-9 recovery wells on site. Landowner has denied further access to the site. PSH on groundwater at this site. No pictures taken.

Recommendation: We are at a standstill on this site until landowner (private land) grants access.

November 7, 2002

CERTIFIED MAIL RETURN RECEIPT REQUESTED
(ALSO BY FACSIMILE)

RECEIVED
NOV 13 2002
Environmental Bureau
Oil Conservation Division

Mr. Roger C. Anderson
Environmental Bureau Chief
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Notice of Violation: Abatement Plan (AP-16) Bob Durham (Your letter to Mr. Wayne Brunette of EOTT Energy Corporation, dated October 8, 2002)

Dear Mr. Anderson:

I submit this letter on behalf of EOTT Energy Pipeline Limited Partnership ("EOTT") in response to your October 8, 2002 correspondence referenced above. In your previous correspondence, you requested that EOTT submit information regarding: (1) a work plan to discover the nature and cause of releases of leaks from EOTT pipelines in the W ½ of sections 29 and 32, T19S, R37E; and (2) an explanation for the apparent discrepancies in dates and data in ETGI's March 2001 report. I provide brief explanations for both issues below, and as I reiterate in my closing remarks, we are available to meet with you at your earliest convenience to discuss these matters in more detail or to answer any additional questions that you may have.

(1) A work plan to discover the nature and cause of releases of leaks from EOTT pipelines in the W ½ sections of 29 and 32, T19S, R37E.

Regarding activities conducted by EOTT to determine the "nature and cause of releases" from the Monument 10" line, EOTT slip lined the Monument 10" pipeline in February 2000 with poly pipe through Sections 29 and 32. There has been one release on this section of pipe subsequent to the installation of the poly pipe. The release was attributed to the failure of a coupling at the "tie in" with a downstream pipeline. EOTT does not anticipate future releases from this section of pipe. Where identified, releases associated with the Monument 10" that occurred in 1999 to present have been attributed to external corrosion.

Because of the complexities associated with the assessment of the Bob Durham and Jimmy B. Cooper sites, EPSC is recommending that EPSC co-develop a work plan with the NMOCD to address concerns that the agency may have concerning these two sites and other releases in Sections 29 and 32. These complexities include landowner litigation and the presence of multiple pipelines (active and inactive) in these sections. In addition, EPSC is prepared to release to the NMOCD all the results of assessment activities that have been gathered in support of landowner litigation. EPSC is prepared to

discuss this additional information at your earliest convenience and will submit a summary report to the NMOCD and Jimmy B. Cooper no later than December 15, 2002. The additional information should assist in the development of the previously mentioned work plan.

(2) An explanation for the apparent discrepancies in dates and data in ETGI's March 2001 report.

It appears that there are two specific sources for the apparent discrepancies and resulting confusion associated with the March 2001 report (electronic data storage procedures and inadvertent inclusion of inaccurate data). The first source of confusion results from the manner in which ETGI stores electronic project data (e.g., tables, figures, maps, etc.). Certain project information is automatically updated when new data is generated. In some cases, the dated material is no longer stored, in part, in an effort to maintain adequate storage space on the company's servers. Consequently, certain electronically maintained information is updated and retained only in its most current electronic form.

With these electronic storage procedures in mind, I now turn to the specific document in question. An initial Subsurface Investigation Report (Stage I Abatement Plan) was submitted to the NMOCD in May of 2000, approximately four months after the discovery of the Durham release site, which fully met the requirements for the filing of the Stage I Abatement Plan. This initial report summarized activities conducted between January 25, 2000 and February 10, 2000. A total of 27 borings were placed, 25 of which were completed as monitor wells. Later, following an on-site meeting with and at the request of Ms. Donna Williams of the Hobbs NMOCD office, an updated report, dated "May 2000 and Revised June 2000," was prepared and submitted to the NMOCD with an expanded distribution list. A draft version of the March 2001 Subsurface Investigation Report, which was prepared and submitted to EOTT's legal department in March 2001, contained data collected between January 25, 2000 and June 28, 2000. Upon a request from NMOCD, EOTT authorized ETGI to resubmit the March 2001 report to the agency in June 2002, or more than one year following its initial compilation and two years following the data cutoff for the draft report. While EOTT has not been able to locate a transmittal letter that accompanied the original May 2000, report to the NMOCD, EPSC believes that the report was submitted prior to any required submittal date, since our records do not contain any written request for a Stage 1 Abatement Plan, as provided in Rule 19. During that two-year period following its initial preparation, ETGI updated and enhanced certain documents contained within the March 2001 report for intervening NMOCD reports, including annual groundwater reports. Thus, even though the cover page identified the date of the report as March 2001, the report nonetheless contained some information that was generated after that date--specifically, subsequent colorized versions of the Site Location Map Figures 1 and 2. The insertion of the more current data associated with these maps was in no way meant to confuse or mislead the OCD, but rather was a result of the time lag in submission of the report coupled with ETGI's electronic data storage procedures.

Mr. Roger Anderson
November 7, 2002

A second inconsistency identified in certain figures contained within the March 2001 report is the result of inadvertent input errors made by ETGI in populating the groundwater elevation table. ETGI has discovered that errors began with the September 19, 2000 input and were subsequently propagated throughout the history of the table. Unfortunately, these errors were consistently reported in all of ETGI's reports, including the Stage I Abatement Plan(s) and the Annual Groundwater Monitoring reports for 2001 and 2002. The last report to be submitted with the erroneous data appears to be the April 2002 Annual Groundwater Monitoring Report. I have attached three copies of the revised groundwater elevation table, all clearly marked as revised, for inclusion in the March 2001 Site Investigation Report (Stage I Abatement Plan). Moreover, within thirty days, we will provide updated copies for inclusion in the annual groundwater reports.

We sincerely regret any confusion that has resulted from the inadvertent use of erroneous groundwater elevation data and electronic data storage procedures used by ETGI. In an effort to cure past inaccuracies and avoid future confusion, I also have attached copies (not color reproductions) of three Site Investigation Reports (Stage I Abatement Plan) dated as follows: May 2000; May 2000 and Revised June 2000; and March 2001. In addition, I provide for your inspection a copy of the original draft of the March 2001 report that was submitted to the EOTT legal department in March 2001.

I hope you find that the above responses and the attached documents fully address the two areas of concern that you raised in your October 8 correspondence. EPSC and EOTT once again apologize for any confusion that may have resulted from previous submissions and are prepared to meet with the NMOCD at the agency's convenience in order to provide any additional details that you might require or address any specific questions that you may have regarding these issues. Please contact me at your earliest convenience if we can be of any further assistance to the NMOCD in this matter.

Sincerely,

William Kendrick / BY CDN

William Kendrick
Environmental Affairs, Senior Director
Enron Pipeline Services Company
1400 Smith Street
Houston, TX 77002
(713) 646-7644

Enclosures

Separately hand delivered by ETGI at the request of EPSC
May 2000 Subsurface Investigation Report
May 2000 and Revised June 2000 Subsurface Investigation Report
March 2001 Subsurface Investigation Report
Draft March 2001 Subsurface Investigation Report
Revised groundwater elevation table (three copies)



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 8, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004 3929 3954

Mr. Wayne Brunette
EOTT Energy Corporation
5805 East Highway 80
Midland, Texas 79701

SUBJ: NOTICE OF VIOLATION: ABATEMENT PLAN (AP-16) BOB DURHAM

REF: Environmental Technology Group, Inc.'s (ETGI) March 2001 "SUBSURFACE INVESTIGATION REPORT (STAGE 1 ABATEMENT PLAN) EOTT ENERGY GROUP BOB DURHAM RELEASE SITE LEA COUNTY, NEW MEXICO"

Dear Mr. Brunette:

On July 1, 2002, the New Mexico Oil Conservation Division (OCD) notified EOTT of administrative deficiencies in ETGI's Stage 1 Abatement Plan Proposal for investigation of ground water pollution at EOTT's pipeline located near the NE/4 of the NW/4 of Section 32, Township 19 S, Range 37 E, NMPM, Lea County, New Mexico. The OCD required that EOTT submit a work plan to investigate the nature and causes of releases in this area. To date the OCD has not received the proposed work plan as required. As a result EOTT is in violation of OCD Rule 19.H.4.

In addition, OCD has serious concerns about ETGI's report dated March 2001, referenced above, an unsigned copy of which was received by OCD on June 26, 2002 and a signature page was received on August 20, 2002. OCD has reasons to believe this report was actually completed some time after March 2001. Further, information submitted with this report contradicts information submitted in later annual reports. Persons who fraudulently submit reports to OCD can be subject to fines of \$5,000 or three years in jail or both, as well as civil penalties.

In order to address these possible violations, the OCD requires that EOTT submit, by November 7, 2002, the following information.

- 1) A work plan to discover the nature and cause of releases of leaks from EOTT pipelines in the W ½ of sections 29 and 32, T19S, R37E.
- 2) An explanation for the apparent discrepancies in dates and data in ETGI's March 2001 report.

Wayne Brunette, page 2 of 2

Failure to provide this information may result in EOTT being summoned to a show cause hearing before a Division Hearing Examiner where the Division staff will recommend issuance of a formal order requiring compliance with OCD rules. Such an order may include imposition of civil penalties. If you have any questions, please contact Randy Bayliss of my staff at (505) 476-3493.

Sincerely,

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

Roger C. Anderson
Environmental Bureau Chief

Cc: Chris Williams
Larry Johnson
David Brooks

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

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

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

F.L. HEIDEL
(1913-1985)

August 2, 2002

Director of the Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: EOTT Stage 1 Abatement Plan Proposal for
the Bob Durham Leak Site located in
Monument, Lea County, New Mexico**

02 JUL 30 AM 12:56
OIL CONSERVATION DIV.

Dear Sir/Madam:

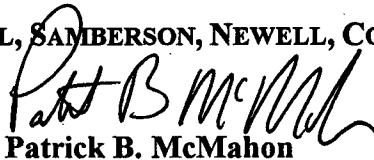
As per the Notice of Publication for the above referenced matter, please accept this correspondence, and the attached, as Mr. Bob Durham's written comments on EOTT's Stage 1 Abatement Plan Proposal.

In addition, this letter is Mr. Durham's written request for a public hearing on this matter. The reasons for his request for public hearing are fully set forth in the attached comments.

Thank you,

HEIDEL, SAMBERSON, NEWELL, COX & McMAHON

By:


Patrick B. McMahon

02 AUG -5 PM 2:22
OIL CONSERVATION DIV.

PBM:cd
Enclosure
pc w/encl: Chris Williams

TO: Director, Oil Conservation Division

FROM: Mr. Bob Durham
Monument, Lea County, New Mexico
c/o Heidel, Samberson, Newell, Cox & McMahon
Post Office Drawer 1599
Lovington, New Mexico 88260

RE: EOTT Stage 1 Abatement Plan Proposal for
the Bob Durham Leak Site located in
Monument, Lea County, New Mexico

DATE: August 2, 2002

Pursuant to the Notice of Publication regarding EOTT's Stage 1 Abatement Plan Proposal for the Bob Durham site located in Monument, New Mexico (hereinafter referred to as the "Plan") the following are Mr. Bob Durham's comments on the Plan:

On or about July 2, 2002, Environmental Technology Group, Inc. of Hobbs, New Mexico, through Mr. Ken Dutton (Operations/Project Manager), submitted the above referenced Plan on behalf of EOTT to the Hobbs office of the Oil Conservation Division. This Plan is in response to a pipeline leak discovered by EOTT personnel on Mr. Durham's property.

The Oil Conservation Division (hereinafter referred to as "OCD") has been charged with the duty to protect the public health, fresh waters, animal and plant life and the environment from leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to any of these categories. In addition, the OCD has a duty to prevent leaks, spills or releases of any material from unreasonably interfering with the public welfare or use of property. To those ends, the OCD has compiled a document entitled, "Guidelines for Remediation of Leaks, Spills and Releases" (hereinafter referred to as "Guidelines"). It is through the procedures and protocols set forth in the Guidelines that leaks, spills and releases are to be addressed by the OCD and by the responsible party. The responsible party may deviate from these procedures and protocols if they provide a scientific basis for the deviation.

The Plan does not request a deviation from the Guidelines. Accordingly, the Plan must meet the requirements set forth in the Guidelines.

The Plan is deficient for the following reasons:

1. First and foremost, the Plan, as submitted by EOTT, is outdated. The Plan was authored by Mr. Dutton and dated March 2001 and yet was submitted to the OCD on July 2, 2002, more than one year and three months after the Plan was completed.

EOTT's Plan fails to account for the fifteen months that have passed between completion of the Plan and the date the Plan was submitted to OCD. Mr. Durham suspects that valuable information that was gathered and activity that was conducted during the fifteen (15) months at issue should be included in the Plan and are necessary for an accurate assessment of this site. For example, in the period of time from January 25, 2000 to December 1, 2000, approximately ten months, 8,585 gallons of crude oil were removed from the subsurface of the property in question. The Plan ignores all activities at the site from March 2001 to July 2002.

The Plan is untimely, fails to account for activity and information gathered from March 2001 to July 2002, and does not accurately assess the site.

2. The Plan identifies the location of the site as follows:

- A. "UL C, Section 32, T19S, R37E" (Coversheet of the Plan).
- B. "NW/4 NW/4 Section 32, Township 19S, Range 37 East and in the NE/4 NE/4 Section 31, Township 19 South, Range 37 East, N.M.P.M. Lea County, New Mexico (Notice of Publication).
- C. NE/4 of the NW/4 of Section 32, Township 19 South, Range 37 East (Page One of the Plan).
- D. NW 1/4 NW 1/4 Section 32, Township 19 South, Range 37 East (Figures One and Two of the Plan).

The Plan identifies the location of the site at issue through four different property descriptions.

Of the four property descriptions, three different locations are simultaneously identified as the site at issue. In addition, the Plan fails to identify Mr. Durham's real property as being part of the site. This is a glaring error considering the fact that the pipeline leak at issue occurred on fee land owned by Mr. Durham, the excavation occurred on the property owned by Mr. Durham, and three (3) soil borings and sixteen (16) monitor wells are located on property owned by Mr. Durham.

The property descriptions are erroneous, confusing and do not identify the real property owned by Mr. Durham which has been impacted by the contamination.

3. The Plan fails to assess the impacts to the Durhams' health, to the public health, to animals and plants, to the Durhams' property and to the interference with the use of the Durhams' property caused by the leak at issue.

4. The Plan makes a cursory identification of an impact to groundwater in the SE/4 SE/4 of Section 30, Township 19 South, Range 37 East, N.M.P.M., Lea County, New Mexico. The Plan fails to fully assess the impact to groundwater in this location. (See Figure Seven of the Plan).
5. The Plan fails to fully assess historic contamination events at the site.
6. The Plan fails to fully assess the western component to the generally south trending gradient of the groundwater at the site. In that regard, the Plan fails to fully assess all groundwater migration pathways for the contaminants and the potential for further impact to groundwater in the above referenced Section 30.
7. The Public Notice for the Plan states that the Plan "presents EOTT's proposed methods for remediation of the site including remediation of the contaminated soils; remediation of contaminated groundwater; site maintenance activities; a monitoring and sampling plan for soils and groundwater; preparation of regular remediation reports; and a schedule for implementation of all remediation and monitoring activities.", (Public Notice.)
 - A. The Plan sets forth activities conducted by EOTT and its agents from January 2000 to March 2001. The Plan does not present proposed methods for remediation of contaminated soils.
 - B. The Plan does not present proposed methods for remediation of contaminated groundwater.
 - C. The Plan does not present proposed site maintenance activities.
 - D. The Plan does not present a proposed monitoring and sampling plan for soils.
 - E. The Plan does not present a proposed plan for preparation of regular remediation reports.
 - F. The Plan does not present a proposed schedule for implementation of all remediation and monitoring activities.

The Plan fails to do what the Public Notice says that it does.

8. The Plan represents that TPH (Total Petroleum Hydrocarbons) levels in soils at five (5) feet below ground surface in Monitor Well #1 was 5,499 mg/kg. The Plan represents that TPH levels in soils at fifteen (15) below ground surface in Monitor Well #12 were 3,501 mg/kg. As such, the Plan misrepresents the TPH levels in soils at these two locations. Soil samples at these two locations were sampled for TPH in

the gasoline range and the diesel range only and were not sampled for the entire TPH range.

9. The Plan failed to utilize the EPA Methodology required by the Guidelines to analyze BTEX concentrations in soil samples.
10. The Plan failed to utilize the EPA Methodology required by the Guidelines to analyze BTEX concentrations in groundwater samples.
11. The Plan failed to utilize the EPA Methodology required by the Guidelines to analyze Polynuclear Aromatic Hydrocarbons in groundwater samples.
12. The Plan fails to fully assess the extent of groundwater contamination by benzo-a-pyrene, a chemical that is often characterized as carcinogenic.
13. Of the thirty-six (36) monitor wells located at the site, the Plan does not identify any monitor well that was purged in accordance with the Guidelines.
14. The Plan does not fully assess the nature and cause of elevated levels of metals in groundwater at the site.
15. The Plan fails to address Mr. Durham's concerns regarding notification of activity to be conducted on his private property.

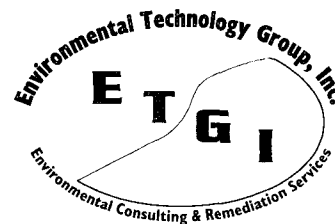
Mr. Durham reserves the right to modify any of these comments, to withdraw any of these comments and/or to add additional comments as additional information becomes available.

Respectfully Submitted,

HEIDEL, SAMBERSON, NEWELL, COX & MCMAHON
Post Office Drawer 1599
Lovington, New Mexico 88260
(505) 396-3303

By: 

Patrick B. McMahon
Attorneys for Robert Durham



September 9, 2002

Mr. Bill Olson & Mr. Randy Bayliss
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505

RECEIVED

SEP 11 2002

Environmental Bureau
Oil Conservation Division

Dear Bill & Randy:

AP-16

The enclosed Bob Durham Stage II reports, dated July 2002 are for your review and approval. The additional work performed on-site after July 2002 is not included. This information will be provided as an addendum to this report. We are awaiting analytical results, figures, tables and surveying data.

The field notes of the delineation were sent in August 2002.

If you have questions, feel free to contact me.

Sincerely;


Ken Dutton
NM Area Manager

**Duke Energy Field Services Site
Information and Metrics**
Incident Date and NMOCD Notified?

May 6, 2002

NMOCD notified immediately

SITE: C-Line5602		Assigned Site Reference #:	
Company: Duke Energy Field Services			
Street Address: 11525 West Carlsbad Highway			
Mailing Address: 11525 West Carlsbad Highway			
City, State, Zip: Hobbs, NM 88240			
Representative: Paul Mulkey/Stam Shaver/Ronnie Gilchrest			
Representative Telephone: 505.397.5716 / 505.397.5561			
Telephone:			
Fluid volume released (bbls): 70		Recovered (bbls): 50	
>25 bbls: Notify NMOCD verbally within 24 hrs and submit form C-141 within 15 days. (Also applies to unauthorized releases >500 mcf Natural Gas)			
5-25 bbls: Submit form C-141 within 15 days (Also applies to unauthorized releases of 50-500 mcf Natural Gas)			
Leak, Spill, or Pit (LSP) Name: C-Line5602			
Source of contamination: Natural Gas Gathering Line			
Land Owner, i.e., BLM, ST, Fee, Other: State of New Mexico leased by M. Deck Estate			
LSP Dimensions ~25' x 11'			
LSP Area: 181 ft ²			
Location of Reference Point (RP)			
Location distance and direction from RP			
Latitude: 32° 31' 29.689"N			
Longitude: 103° 17' 11.654"W			
Elevation above mean sea level: 3540' amsl			
Feet from South Section Line			
Feet from West Section Line			
Location- Unit or ¼: SW¼ of the SE ¼		Unit Letter: O	
Location- Section: 31			
Location- Township: 20S			
Location- Range: 37E			
Surface water body within 1000' radius of site: None			
Surface water body within 1000' radius of site:			
Domestic water wells within 1000' radius of site: None			
Domestic water wells within 1000' radius of site:			
Agricultural water wells within 1000' radius of site: None			
Agricultural water wells within 1000' radius of site:			
Public water supply wells within 1000' radius of site: None			
Public water supply wells within 1000' radius of site:			
Depth from land surface to ground water (DG) ~68.5'bgs			
Depth of contamination (DC) -			
Depth to ground water (DG - DC = DtGW) -			
1. Ground Water		2. Wellhead Protection Area	
If Depth to GW <50 feet: 20 points		If <1000' from water source, or; <200' from	
If Depth to GW 50 to 99 feet: 10 points		private domestic water source: 20 points	
If Depth to GW >100 feet: 0 points		If >1000' from water source, or; >200' from	
		private domestic water source: 0 points	
Ground water Score = 10		Wellhead Protection Area Score = 0	
Site Rank (1+2+3) = 10		Surface Water Score = 0	
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19 (18.5' to 68.5'bgs)	10-19 (surface to 18.5'bgs)	0-9
Benzene ¹	10 ppm	10 ppm	10 ppm
BTEX ¹	50 ppm	50 ppm	50 ppm
TPH	100 ppm	1000 ppm	5000 ppm

¹100 ppm field VOC headspace measurement may be substituted for lab analysis



August 19, 2002

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

RECEIVED

AUG 20 2002

Environmental Bureau
Oil Conservation Division

RE: Bob Durham Release Site AP-16, ETGI Project No. EOT 2044C
Subsurface Investigation Report (Stage 1 Abatement Plan)
Your letter, July 31, 2002

Dear Mr. Bayliss:

This letter is in response to the corrective actions regarding the Stage 1 Abatement Plan not being administratively complete. The attached documentation is being furnished to correct the deficiencies as listed in your July 31, 2002 letter.

Paragraph 1: Mr. Cutty Cunningham, Enron Transportation and Services Company requested that the attached soil boring logs, copies of field notes and analytical results be forwarded to you.

Paragraph 2: The complete water well inventory of water wells inside and within one (1) mile from the perimeter of the contamination zone is attached.

Paragraph 2: A signature page with signatures and a signed quality control review officer is attached.

Copies of the documentation will be furnished to the Hobbs District Office as requested.

Sincerely,



Ken Dutton

New Mexico Area Manager

SUBSURFACE INVESTIGATION REPORT

(STAGE 1 ABATEMENT PLAN)

RECEIVED

AUG 20 2002

Environmental Bureau
Oil Conservation Division

**EOTT ENERGY CORP
BOB DURHAM RELEASE SITE
LEA COUNTY, NEW MEXICO**

**NW ¼ NW ¼ Section 32 Township 19 South Range 37 East
NE ¼ NE ¼ Section 31 Township 19 South Range 37 East
Longitude 32° 37' 27.9" North
Latitude 103° 16' 53.2" West**

Prepared For:
EOTT Energy Corp
5805 East Highway 80
Midland, Texas 79701

Environmental Technology Group, Inc. Project No. EOT2044C

Prepared By:
Environmental Technology Group, Inc.
2540 West Marland
Hobbs, New Mexico 88240

March 2001



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

October 30, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-3716

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

**RE: GROUND WATER ABATEMENT PLAN (AP-16)
OLD TNMPL MONUMENT (VACUUM) 10" PIPELINE
MONUMENT, NEW MEXICO**

Dear Mr. Waldrop:

On February 11, 2000 the New Mexico Oil Conservation Division (OCD) required that EOTT Energy Pipeline Limited Partnership's (EOTT) submit an abatement plan for the Old TNMPL Monument (Vacuum) 10" Pipeline Site to abate ground water pollution. To initiate the abatement plan process, the OCD required that EOTT submit to the OCD by April 14, 2000 a Stage 1 Investigation Proposal pursuant to OCD Rule 19.E.1. and 19.E.3. The OCD has no record of receiving this information.

In order to correct this deficiency, the OCD requires that EOTT submit to the OCD by November 30, 2000 a Stage 1 Investigation Proposal for the Old TNMPL Monument (Vacuum) 10" Pipeline Site 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.

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

TABLE 2
REVISED
GROUND WATER ELEVATION
HISTORICAL TABLE

EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C

RECEIVED

NOV 13 2002

Environmental Bureau
Oil Conservation Division

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/16/00	3,595.43	15.60	15.71	0.11	3,579.81
	06/09/00	3,595.43	15.54	15.60	0.06	3,579.88
	09/19/00	3,595.43	14.97	15.05	0.08	3,580.45
	12/19/00	3,595.43	15.13	15.22	0.09	3,580.29
MW - 2	02/16/00	3,595.64	15.47	15.76	0.29	3,580.13
	06/09/00	3,595.64	15.52	15.81	0.29	3,580.08
	09/19/00	3,595.64	15.19	15.23	0.04	3,580.44
	12/19/00	3,595.64	15.34	15.41	0.07	3,580.29
MW - 3	02/16/00	3,596.22	-	15.51	0.00	3,580.71
	06/09/00	3,596.22	-	15.57	0.00	3,580.65
	09/19/00	3,596.22	-	15.25	0.00	3,580.97
	12/19/00	3,596.22	-	15.38	0.00	3,580.84
MW - 4	02/16/00	3,596.60	15.90	16.70	0.80	3,580.58
	06/09/00	3,596.60	15.85	16.78	0.93	3,580.61
	09/19/00	3,596.60	15.66	16.68	1.02	3,580.79
	12/19/00	3,596.60	15.79	16.51	0.72	3,580.70
MW - 5	02/16/00	3,596.56	17.30	17.38	0.08	3,579.25
	03/29/00	3,596.56	17.56	17.68	0.12	3,578.98
	05/17/00	3,596.56	17.43	17.78	0.35	3,579.08
	06/09/00	3,596.56	17.37	17.68	0.31	3,579.14
	08/28/00	3,596.56	16.84	17.27	0.43	3,579.66
	09/19/00	3,596.56	16.88	17.07	0.19	3,579.65
	12/19/00	3,596.56	17.06	17.45	0.39	3,579.44
MW - 6	02/16/00	3,596.66	15.10	15.33	0.23	3,581.53
	06/09/00	3,596.66	15.06	15.52	0.46	3,581.53
	09/19/00	3,596.66	14.82	14.94	0.12	3,581.82
	12/19/00	3,596.66	15.03	15.17	0.14	3,581.61
MW - 7	02/16/00	3,596.96	17.67	18.58	0.91	3,579.15
	03/29/00	3,596.96	17.58	18.82	1.24	3,579.19
	05/17/00	3,596.96	17.73	18.46	0.73	3,579.12
	06/09/00	3,596.96	17.74	18.41	0.67	3,579.12
	08/28/00	3,596.96	17.08	17.40	0.32	3,579.83
	09/19/00	3,596.96	17.20	17.59	0.39	3,579.70
	12/19/00	3,596.96	17.56	17.81	0.25	3,579.36
MW - 8	02/16/00	3,597.35	16.83	17.12	0.29	3,580.48
	06/09/00	3,597.35	16.90	17.13	0.23	3,580.42
	09/19/00	3,597.35	16.60	16.86	0.26	3,580.71
	12/19/00	3,597.35	16.77	17.01	0.24	3,580.54
MW - 9	02/16/00	3,593.95	-	18.23	0.00	3,575.72
	06/09/00	3,593.95	-	18.20	0.00	3,575.75
	09/19/00	3,593.95	-	18.22	0.00	3,575.73
	12/19/00	3,593.95	-	18.23	0.00	3,575.72
MW - 10	02/16/00	3,594.57	-	20.32	0.00	3,574.25
	06/09/00	3,594.57	-	20.41	0.00	3,574.16

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
	09/19/00	3,594.57	-	20.21	0.00	3,574.36
	12/19/00	3,594.57	-	20.36	0.00	3,574.21
MW - 11	02/16/00	3,593.77	-	19.37	0.00	3,574.40
	06/09/00	3,593.77	-	19.45	0.00	3,574.32
	09/19/00	3,593.77	-	19.58	0.00	3,574.19
	12/19/00	3,593.77	-	19.33	0.00	3,574.44
MW - 12	02/16/00	3,596.39	18.82	20.21	1.39	3,577.36
	03/09/00	3,596.39	18.65	20.01	1.36	3,577.54
	03/29/00	3,596.39	18.87	19.85	0.98	3,577.37
	04/06/00	3,596.39	19.11	19.86	0.75	3,577.17
	05/17/00	3,596.39	18.45	19.36	0.91	3,577.80
	06/09/00	3,596.39	18.55	18.91	0.36	3,577.79
	08/28/00	3,596.39	18.32	18.81	0.49	3,578.00
	09/19/00	3,596.39	18.48	18.86	0.38	3,577.85
	12/19/00	3,596.39	18.61	18.95	0.34	3,577.73
MW - 13	02/16/00	3,592.71	-	19.59	0.00	3,573.12
	06/09/00	3,592.71	-	19.61	0.00	3,573.10
	09/19/00	3,592.71	-	19.56	0.00	3,573.15
	12/19/00	3,592.71	-	19.60	0.00	3,573.11
MW - 14	02/16/00	3,592.73	-	19.53	0.00	3,573.20
	06/09/00	3,592.73	-	19.57	0.00	3,573.16
	09/19/00	3,592.73	-	19.45	0.00	3,573.28
	12/19/00	3,592.73	-	19.49	0.00	3,573.24
MW - 15	02/16/00	3,595.93	-	18.54	0.00	3,577.39
	06/09/00	3,595.93	-	18.30	0.00	3,577.63
	09/19/00	3,595.93	-	18.11	0.00	3,577.82
	12/19/00	3,595.93	-	18.25	0.00	3,577.68
MW - 16	02/16/00	3,595.75	16.53	17.01	0.48	3,579.15
	03/09/00	3,595.75	17.00	17.47	0.47	3,578.68
	03/29/00	3,595.75	17.48	17.71	0.23	3,578.24
	05/17/00	3,595.75	16.94	17.20	0.26	3,578.77
	06/09/00	3,595.75	16.89	17.08	0.19	3,578.83
	08/28/00	3,595.75	16.30	16.45	0.15	3,579.43
	09/19/00	3,595.75	16.41	16.53	0.12	3,579.32
	12/19/00	3,595.75	16.74	16.86	0.12	3,578.99
MW - 17	02/16/00	3,593.17	-	18.24	0.00	3,574.93
	02/17/00	3,593.17	-	18.21	0.00	3,574.96
	06/09/00	3,593.17	-	18.27	0.00	3,574.90
	09/19/00	3,593.17	-	18.21	0.00	3,574.96
	12/19/00	3,593.17	-	18.24	0.00	3,574.93
MW - 18	02/16/00	3,593.39	-	18.65	0.00	3,574.74
	02/17/00	3,593.39	-	18.61	0.00	3,574.78
	06/09/00	3,593.39	-	18.79	0.00	3,574.60
	09/19/00	3,593.39	-	18.65	0.00	3,574.74
	12/19/00	3,593.39	-	-	-	-

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 19	02/16/00	3,599.33	-	17.45	0.00	3,581.88
	02/17/00	3,599.33	-	17.43	0.00	3,581.90
	06/09/00	3,599.33	-	17.45	0.00	3,581.88
	09/19/00	3,599.33	-	17.44	0.00	3,581.89
	12/19/00	3,599.33	-	17.45	0.00	3,581.88
MW - 20	02/16/00	3,597.64	-	17.13	0.00	3,580.51
	06/08/00	3,597.64	-	17.16	0.00	3,580.48
	06/09/00	3,597.64	-	17.16	0.00	3,580.48
	09/19/00	3,597.64	-	17.07	0.00	3,580.57
	12/19/00	3,597.64	-	17.06	0.00	3,580.58
MW - 21	02/16/00	3,596.88	-	15.98	0.00	3,580.90
	06/08/00	3,596.88	-	15.97	0.00	3,580.91
	06/09/00	3,596.88	-	15.96	0.00	3,580.92
	09/19/00	3,596.88	-	15.88	0.00	3,581.00
	12/19/00	3,596.88	-	15.91	0.00	3,580.97
MW - 22	02/16/00	3,598.34	-	17.23	0.00	3,581.11
	02/17/00	3,598.34	-	17.21	0.00	3,581.13
	06/09/00	3,598.34	-	17.23	0.00	3,581.11
	09/19/00	3,598.34	-	17.22	0.00	3,581.12
	12/19/00	3,598.34	-	17.24	0.00	3,581.10
MW - 23	02/16/00	3,598.07	-	17.83	0.00	3,580.24
	06/08/00	3,598.07	-	17.68	0.00	3,580.39
	06/09/00	3,598.07	17.68	17.68	0.00	3,580.39
	09/19/00	3,598.07	17.77	17.77	0.00	3,580.30
	12/19/00	3,598.07	17.80	17.80	0.00	3,580.27
MW - 24	02/16/00	3,598.01	-	16.97	0.00	3,581.04
	02/17/00	3,598.01	-	16.95	0.00	3,581.06
	06/09/00	3,598.01	-	16.98	0.00	3,581.03
	09/19/00	3,598.01	-	16.82	0.00	3,581.19
	12/19/00	3,598.01	-	16.97	0.00	3,581.04
MW - 25	02/16/00	3,599.25	-	18.79	0.00	3,580.46
	02/17/00	3,599.25	-	18.78	0.00	3,580.47
	06/09/00	3,599.25	-	18.88	0.00	3,580.37
	09/19/00	3,599.25	-	18.57	0.00	3,580.68
	12/19/00	3,599.25	-	18.71	0.00	3,580.54
MW - 26	NOT INSTALLED					
	06/08/00	3,595.26	-	14.73	0.00	3,580.53
	06/09/00	3,595.26	-	14.73	0.00	3,580.53
	09/19/00	3,595.26	-	14.68	0.00	3,580.58
	12/19/00	3,595.26	-	14.64	0.00	3,580.62
MW - 27	NOT INSTALLED					
	06/08/00	3,592.64	-	14.14	0.00	3,578.50
	06/09/00	3,592.64	-	14.13	0.00	3,578.51
	09/19/00	3,592.64	-	14.08	0.00	3,578.56
	12/19/00	3,592.64	-	14.09	0.00	3,578.55

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 28	NOT INSTALLED					
	07/13/00	3,598.02		DRY		
	09/19/00	3,598.02		DRY		
	12/19/00	3,598.02		DRY		
MW - 29	NOT INSTALLED					
	07/13/00	3,595.29	-	21.42	0.00	3,573.87
	09/19/00	3,595.29	-	21.55	0.00	3,573.74
	12/19/00	3,595.29	-	21.55	0.00	3,573.74
MW - 30	NOT INSTALLED					
	07/13/00	3,595.74	-	22.35	0.00	3,573.39
	09/19/00	3,595.74	-	22.27	0.00	3,573.47
	12/19/00	3,595.74	-	22.29	0.00	3,573.45
MW - 31	NOT INSTALLED					
	07/13/00	3,593.77	-	20.68	0.00	3,573.09
	09/19/00	3,593.77	-	21.03	0.00	3,572.74
	12/19/00	3,593.77	-	21.23	0.00	3,572.54
MW - 32	NOT INSTALLED					
	07/13/00	3,592.11	-	19.79	0.00	3,572.32
	09/19/00	3,592.11	19.67	19.76	0.09	3,572.43
	12/19/00	3,592.11	19.68	19.87	0.19	3,572.40
MW - 33	NOT INSTALLED					
	07/13/00	3,592.55	-	20.07	0.00	3,572.48
	09/19/00	3,592.55	-	19.99	0.00	3,572.56
	12/19/00	3,592.55	-	19.96	0.00	3,572.59
MW - 34	NOT INSTALLED					
	07/13/00	3,593.30	-	19.01	0.00	3,574.29
	09/19/00	3,593.30	-	19.19	0.00	3,574.11
	12/19/00	3,593.30	-	19.21	0.00	3,574.09
MW - 35	NOT INSTALLED					
	07/13/00	3,594.47	-	18.67	0.00	3,575.80
	09/19/00	3,594.47	-	18.73	0.00	3,575.74
	12/19/00	3,594.47	-	18.78	0.00	3,575.69
MW - 36	NOT INSTALLED					
	07/13/00	3,595.80	-	18.03	0.00	3,577.77
	09/19/00	3,595.80	-	18.13	0.00	3,577.67
	12/19/00	3,595.80	-	18.15	0.00	3,577.65

* Unable to gauge MW-18 on 12/19/00 due to drilling activities

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Environmental Bureau
Oil Conservation Division

TABLE 2
REVISED
GROUND WATER ELEVATION
HISTORICAL TABLE

EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/16/00	3,595.43	15.60	15.71	0.11	3,579.81
	06/09/00	3,595.43	15.54	15.60	0.06	3,579.88
	09/19/00	3,595.43	14.97	15.05	0.08	3,580.45
	12/19/00	3,595.43	15.13	15.22	0.09	3,580.29
MW - 2	02/16/00	3,595.64	15.47	15.76	0.29	3,580.13
	06/09/00	3,595.64	15.52	15.81	0.29	3,580.08
	09/19/00	3,595.64	15.19	15.23	0.04	3,580.44
	12/19/00	3,595.64	15.34	15.41	0.07	3,580.29
MW - 3	02/16/00	3,596.22	-	15.51	0.00	3,580.71
	06/09/00	3,596.22	-	15.57	0.00	3,580.65
	09/19/00	3,596.22	-	15.25	0.00	3,580.97
	12/19/00	3,596.22	-	15.38	0.00	3,580.84
MW - 4	02/16/00	3,596.60	15.90	16.70	0.80	3,580.58
	06/09/00	3,596.60	15.85	16.78	0.93	3,580.61
	09/19/00	3,596.60	15.66	16.68	1.02	3,580.79
	12/19/00	3,596.60	15.79	16.51	0.72	3,580.70
MW - 5	02/16/00	3,596.56	17.30	17.38	0.08	3,579.25
	03/29/00	3,596.56	17.56	17.68	0.12	3,578.98
	05/17/00	3,596.56	17.43	17.78	0.35	3,579.08
	06/09/00	3,596.56	17.37	17.68	0.31	3,579.14
	08/28/00	3,596.56	16.84	17.27	0.43	3,579.66
	09/19/00	3,596.56	16.88	17.07	0.19	3,579.65
MW - 6	12/19/00	3,596.56	17.06	17.45	0.39	3,579.44
	02/16/00	3,596.66	15.10	15.33	0.23	3,581.53
	06/09/00	3,596.66	15.06	15.52	0.46	3,581.53
	09/19/00	3,596.66	14.82	14.94	0.12	3,581.82
MW - 7	12/19/00	3,596.66	15.03	15.17	0.14	3,581.61
	02/16/00	3,596.96	17.67	18.58	0.91	3,579.15
	03/29/00	3,596.96	17.58	18.82	1.24	3,579.19
	05/17/00	3,596.96	17.73	18.46	0.73	3,579.12
MW - 8	06/09/00	3,596.96	17.74	18.41	0.67	3,579.12
	08/28/00	3,596.96	17.08	17.40	0.32	3,579.83
	09/19/00	3,596.96	17.20	17.59	0.39	3,579.70
	12/19/00	3,596.96	17.56	17.81	0.25	3,579.36
MW - 9	02/16/00	3,597.35	16.83	17.12	0.29	3,580.48
	06/09/00	3,597.35	16.90	17.13	0.23	3,580.42
	09/19/00	3,597.35	16.60	16.86	0.26	3,580.71
	12/19/00	3,597.35	16.77	17.01	0.24	3,580.54
MW - 10	02/16/00	3,593.95	-	18.23	0.00	3,575.72
	06/09/00	3,593.95	-	18.20	0.00	3,575.75
	09/19/00	3,593.95	-	18.22	0.00	3,575.73
	12/19/00	3,593.95	-	18.23	0.00	3,575.72
MW - 10	02/16/00	3,594.57	-	20.32	0.00	3,574.25
	06/09/00	3,594.57	-	20.41	0.00	3,574.16

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
	09/19/00	3,594.57	-	20.21	0.00	3,574.36
	12/19/00	3,594.57	-	20.36	0.00	3,574.21
MW - 11	02/16/00	3,593.77	-	19.37	0.00	3,574.40
	06/09/00	3,593.77	-	19.45	0.00	3,574.32
	09/19/00	3,593.77	-	19.58	0.00	3,574.19
	12/19/00	3,593.77	-	19.33	0.00	3,574.44
MW - 12	02/16/00	3,596.39	18.82	20.21	1.39	3,577.36
	03/09/00	3,596.39	18.65	20.01	1.36	3,577.54
	03/29/00	3,596.39	18.87	19.85	0.98	3,577.37
	04/06/00	3,596.39	19.11	19.86	0.75	3,577.17
	05/17/00	3,596.39	18.45	19.36	0.91	3,577.80
	06/09/00	3,596.39	18.55	18.91	0.36	3,577.79
	08/28/00	3,596.39	18.32	18.81	0.49	3,578.00
	09/19/00	3,596.39	18.48	18.86	0.38	3,577.85
	12/19/00	3,596.39	18.61	18.95	0.34	3,577.73
MW - 13	02/16/00	3,592.71	-	19.59	0.00	3,573.12
	06/09/00	3,592.71	-	19.61	0.00	3,573.10
	09/19/00	3,592.71	-	19.56	0.00	3,573.15
	12/19/00	3,592.71	-	19.60	0.00	3,573.11
MW - 14	02/16/00	3,592.73	-	19.53	0.00	3,573.20
	06/09/00	3,592.73	-	19.57	0.00	3,573.16
	09/19/00	3,592.73	-	19.45	0.00	3,573.28
	12/19/00	3,592.73	-	19.49	0.00	3,573.24
MW - 15	02/16/00	3,595.93	-	18.54	0.00	3,577.39
	06/09/00	3,595.93	-	18.30	0.00	3,577.63
	09/19/00	3,595.93	-	18.11	0.00	3,577.82
	12/19/00	3,595.93	-	18.25	0.00	3,577.68
MW - 16	02/16/00	3,595.75	16.53	17.01	0.48	3,579.15
	03/09/00	3,595.75	17.00	17.47	0.47	3,578.68
	03/29/00	3,595.75	17.48	17.71	0.23	3,578.24
	05/17/00	3,595.75	16.94	17.20	0.26	3,578.77
	06/09/00	3,595.75	16.89	17.08	0.19	3,578.83
	08/28/00	3,595.75	16.30	16.45	0.15	3,579.43
	09/19/00	3,595.75	16.41	16.53	0.12	3,579.32
	12/19/00	3,595.75	16.74	16.86	0.12	3,578.99
MW - 17	02/16/00	3,593.17	-	18.24	0.00	3,574.93
	02/17/00	3,593.17	-	18.21	0.00	3,574.96
	06/09/00	3,593.17	-	18.27	0.00	3,574.90
	09/19/00	3,593.17	-	18.21	0.00	3,574.96
	12/19/00	3,593.17	-	18.24	0.00	3,574.93
MW - 18	02/16/00	3,593.39	-	18.65	0.00	3,574.74
	02/17/00	3,593.39	-	18.61	0.00	3,574.78
	06/09/00	3,593.39	-	18.79	0.00	3,574.60
	09/19/00	3,593.39	-	18.65	0.00	3,574.74
	12/19/00	3,593.39	-	-	-	-

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 19	02/16/00	3,599.33	-	17.45	0.00	3,581.88
	02/17/00	3,599.33	-	17.43	0.00	3,581.90
	06/09/00	3,599.33	-	17.45	0.00	3,581.88
	09/19/00	3,599.33	-	17.44	0.00	3,581.89
	12/19/00	3,599.33	-	17.45	0.00	3,581.88
MW - 20	02/16/00	3,597.64	-	17.13	0.00	3,580.51
	06/08/00	3,597.64	-	17.16	0.00	3,580.48
	06/09/00	3,597.64	-	17.16	0.00	3,580.48
	09/19/00	3,597.64	-	17.07	0.00	3,580.57
	12/19/00	3,597.64	-	17.06	0.00	3,580.58
MW - 21	02/16/00	3,596.88	-	15.98	0.00	3,580.90
	06/08/00	3,596.88	-	15.97	0.00	3,580.91
	06/09/00	3,596.88	-	15.96	0.00	3,580.92
	09/19/00	3,596.88	-	15.88	0.00	3,581.00
	12/19/00	3,596.88	-	15.91	0.00	3,580.97
MW - 22	02/16/00	3,598.34	-	17.23	0.00	3,581.11
	02/17/00	3,598.34	-	17.21	0.00	3,581.13
	06/09/00	3,598.34	-	17.23	0.00	3,581.11
	09/19/00	3,598.34	-	17.22	0.00	3,581.12
	12/19/00	3,598.34	-	17.24	0.00	3,581.10
MW - 23	02/16/00	3,598.07	-	17.83	0.00	3,580.24
	06/08/00	3,598.07	-	17.68	0.00	3,580.39
	06/09/00	3,598.07	17.68	17.68	0.00	3,580.39
	09/19/00	3,598.07	17.77	17.77	0.00	3,580.30
	12/19/00	3,598.07	17.80	17.80	0.00	3,580.27
MW - 24	02/16/00	3,598.01	-	16.97	0.00	3,581.04
	02/17/00	3,598.01	-	16.95	0.00	3,581.06
	06/09/00	3,598.01	-	16.98	0.00	3,581.03
	09/19/00	3,598.01	-	16.82	0.00	3,581.19
	12/19/00	3,598.01	-	16.97	0.00	3,581.04
MW - 25	02/16/00	3,599.25	-	18.79	0.00	3,580.46
	02/17/00	3,599.25	-	18.78	0.00	3,580.47
	06/09/00	3,599.25	-	18.88	0.00	3,580.37
	09/19/00	3,599.25	-	18.57	0.00	3,580.68
	12/19/00	3,599.25	-	18.71	0.00	3,580.54
MW - 26	NOT INSTALLED					
	06/08/00	3,595.26	-	14.73	0.00	3,580.53
	06/09/00	3,595.26	-	14.73	0.00	3,580.53
	09/19/00	3,595.26	-	14.68	0.00	3,580.58
	12/19/00	3,595.26	-	14.64	0.00	3,580.62
MW - 27	NOT INSTALLED					
	06/08/00	3,592.64	-	14.14	0.00	3,578.50
	06/09/00	3,592.64	-	14.13	0.00	3,578.51
	09/19/00	3,592.64	-	14.08	0.00	3,578.56
	12/19/00	3,592.64	-	14.09	0.00	3,578.55

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 28	NOT INSTALLED					
	07/13/00	3,598.02		DRY		
	09/19/00	3,598.02		DRY		
	12/19/00	3,598.02		DRY		
MW - 29	NOT INSTALLED					
	07/13/00	3,595.29	-	21.42	0.00	3,573.87
	09/19/00	3,595.29	-	21.55	0.00	3,573.74
	12/19/00	3,595.29	-	21.55	0.00	3,573.74
MW - 30	NOT INSTALLED					
	07/13/00	3,595.74	-	22.35	0.00	3,573.39
	09/19/00	3,595.74	-	22.27	0.00	3,573.47
	12/19/00	3,595.74	-	22.29	0.00	3,573.45
MW - 31	NOT INSTALLED					
	07/13/00	3,593.77	-	20.68	0.00	3,573.09
	09/19/00	3,593.77	-	21.03	0.00	3,572.74
	12/19/00	3,593.77	-	21.23	0.00	3,572.54
MW - 32	NOT INSTALLED					
	07/13/00	3,592.11	-	19.79	0.00	3,572.32
	09/19/00	3,592.11	19.67	19.76	0.09	3,572.43
	12/19/00	3,592.11	19.68	19.87	0.19	3,572.40
MW - 33	NOT INSTALLED					
	07/13/00	3,592.55	-	20.07	0.00	3,572.48
	09/19/00	3,592.55	-	19.99	0.00	3,572.56
	12/19/00	3,592.55	-	19.96	0.00	3,572.59
MW - 34	NOT INSTALLED					
	07/13/00	3,593.30	-	19.01	0.00	3,574.29
	09/19/00	3,593.30	-	19.19	0.00	3,574.11
	12/19/00	3,593.30	-	19.21	0.00	3,574.09
MW - 35	NOT INSTALLED					
	07/13/00	3,594.47	-	18.67	0.00	3,575.80
	09/19/00	3,594.47	-	18.73	0.00	3,575.74
	12/19/00	3,594.47	-	18.78	0.00	3,575.69
MW - 36	NOT INSTALLED					
	07/13/00	3,595.80	-	18.03	0.00	3,577.77
	09/19/00	3,595.80	-	18.13	0.00	3,577.67
	12/19/00	3,595.80	-	18.15	0.00	3,577.65

* Unable to gauge MW-18 on 12/19/00 due to drilling activities

RECEIVED

TABLE 2
REVISED
GROUND WATER ELEVATION
HISTORICAL TABLE

EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C

NOV 13 2002
Environmental Bureau
Oil Conservation Division

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 1	02/16/00	3,595.43	15.60	15.71	0.11	3,579.81
	06/09/00	3,595.43	15.54	15.60	0.06	3,579.88
	09/19/00	3,595.43	14.97	15.05	0.08	3,580.45
	12/19/00	3,595.43	15.13	15.22	0.09	3,580.29
MW - 2	02/16/00	3,595.64	15.47	15.76	0.29	3,580.13
	06/09/00	3,595.64	15.52	15.81	0.29	3,580.08
	09/19/00	3,595.64	15.19	15.23	0.04	3,580.44
	12/19/00	3,595.64	15.34	15.41	0.07	3,580.29
MW - 3	02/16/00	3,596.22	-	15.51	0.00	3,580.71
	06/09/00	3,596.22	-	15.57	0.00	3,580.65
	09/19/00	3,596.22	-	15.25	0.00	3,580.97
	12/19/00	3,596.22	-	15.38	0.00	3,580.84
MW - 4	02/16/00	3,596.60	15.90	16.70	0.80	3,580.58
	06/09/00	3,596.60	15.85	16.78	0.93	3,580.61
	09/19/00	3,596.60	15.66	16.68	1.02	3,580.79
	12/19/00	3,596.60	15.79	16.51	0.72	3,580.70
MW - 5	02/16/00	3,596.56	17.30	17.38	0.08	3,579.25
	03/29/00	3,596.56	17.56	17.68	0.12	3,578.98
	05/17/00	3,596.56	17.43	17.78	0.35	3,579.08
	06/09/00	3,596.56	17.37	17.68	0.31	3,579.14
	08/28/00	3,596.56	16.84	17.27	0.43	3,579.66
	09/19/00	3,596.56	16.88	17.07	0.19	3,579.65
	12/19/00	3,596.56	17.06	17.45	0.39	3,579.44
MW - 6	02/16/00	3,596.66	15.10	15.33	0.23	3,581.53
	06/09/00	3,596.66	15.06	15.52	0.46	3,581.53
	09/19/00	3,596.66	14.82	14.94	0.12	3,581.82
	12/19/00	3,596.66	15.03	15.17	0.14	3,581.61
MW - 7	02/16/00	3,596.96	17.67	18.58	0.91	3,579.15
	03/29/00	3,596.96	17.58	18.82	1.24	3,579.19
	05/17/00	3,596.96	17.73	18.46	0.73	3,579.12
	06/09/00	3,596.96	17.74	18.41	0.67	3,579.12
	08/28/00	3,596.96	17.08	17.40	0.32	3,579.83
	09/19/00	3,596.96	17.20	17.59	0.39	3,579.70
	12/19/00	3,596.96	17.56	17.81	0.25	3,579.36
MW - 8	02/16/00	3,597.35	16.83	17.12	0.29	3,580.48
	06/09/00	3,597.35	16.90	17.13	0.23	3,580.42
	09/19/00	3,597.35	16.60	16.86	0.26	3,580.71
	12/19/00	3,597.35	16.77	17.01	0.24	3,580.54
MW - 9	02/16/00	3,593.95	-	18.23	0.00	3,575.72
	06/09/00	3,593.95	-	18.20	0.00	3,575.75
	09/19/00	3,593.95	-	18.22	0.00	3,575.73
	12/19/00	3,593.95	-	18.23	0.00	3,575.72
MW - 10	02/16/00	3,594.57	-	20.32	0.00	3,574.25
	06/09/00	3,594.57	-	20.41	0.00	3,574.16

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
	09/19/00	3,594.57	-	20.21	0.00	3,574.36
	12/19/00	3,594.57	-	20.36	0.00	3,574.21
MW - 11	02/16/00	3,593.77	-	19.37	0.00	3,574.40
	06/09/00	3,593.77	-	19.45	0.00	3,574.32
	09/19/00	3,593.77	-	19.58	0.00	3,574.19
	12/19/00	3,593.77	-	19.33	0.00	3,574.44
MW - 12	02/16/00	3,596.39	18.82	20.21	1.39	3,577.36
	03/09/00	3,596.39	18.65	20.01	1.36	3,577.54
	03/29/00	3,596.39	18.87	19.85	0.98	3,577.37
	04/06/00	3,596.39	19.11	19.86	0.75	3,577.17
	05/17/00	3,596.39	18.45	19.36	0.91	3,577.80
	06/09/00	3,596.39	18.55	18.91	0.36	3,577.79
	08/28/00	3,596.39	18.32	18.81	0.49	3,578.00
	09/19/00	3,596.39	18.48	18.86	0.38	3,577.85
	12/19/00	3,596.39	18.61	18.95	0.34	3,577.73
MW - 13	02/16/00	3,592.71	-	19.59	0.00	3,573.12
	06/09/00	3,592.71	-	19.61	0.00	3,573.10
	09/19/00	3,592.71	-	19.56	0.00	3,573.15
	12/19/00	3,592.71	-	19.60	0.00	3,573.11
MW - 14	02/16/00	3,592.73	-	19.53	0.00	3,573.20
	06/09/00	3,592.73	-	19.57	0.00	3,573.16
	09/19/00	3,592.73	-	19.45	0.00	3,573.28
	12/19/00	3,592.73	-	19.49	0.00	3,573.24
MW - 15	02/16/00	3,595.93	-	18.54	0.00	3,577.39
	06/09/00	3,595.93	-	18.30	0.00	3,577.63
	09/19/00	3,595.93	-	18.11	0.00	3,577.82
	12/19/00	3,595.93	-	18.25	0.00	3,577.68
MW - 16	02/16/00	3,595.75	16.53	17.01	0.48	3,579.15
	03/09/00	3,595.75	17.00	17.47	0.47	3,578.68
	03/29/00	3,595.75	17.48	17.71	0.23	3,578.24
	05/17/00	3,595.75	16.94	17.20	0.26	3,578.77
	06/09/00	3,595.75	16.89	17.08	0.19	3,578.83
	08/28/00	3,595.75	16.30	16.45	0.15	3,579.43
	09/19/00	3,595.75	16.41	16.53	0.12	3,579.32
	12/19/00	3,595.75	16.74	16.86	0.12	3,578.99
MW - 17	02/16/00	3,593.17	-	18.24	0.00	3,574.93
	02/17/00	3,593.17	-	18.21	0.00	3,574.96
	06/09/00	3,593.17	-	18.27	0.00	3,574.90
	09/19/00	3,593.17	-	18.21	0.00	3,574.96
	12/19/00	3,593.17	-	18.24	0.00	3,574.93
MW - 18	02/16/00	3,593.39	-	18.65	0.00	3,574.74
	02/17/00	3,593.39	-	18.61	0.00	3,574.78
	06/09/00	3,593.39	-	18.79	0.00	3,574.60
	09/19/00	3,593.39	-	18.65	0.00	3,574.74
	12/19/00	3,593.39	-	-	-	-

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 19	02/16/00	3,599.33	-	17.45	0.00	3,581.88
	02/17/00	3,599.33	-	17.43	0.00	3,581.90
	06/09/00	3,599.33	-	17.45	0.00	3,581.88
	09/19/00	3,599.33	-	17.44	0.00	3,581.89
	12/19/00	3,599.33	-	17.45	0.00	3,581.88
MW - 20	02/16/00	3,597.64	-	17.13	0.00	3,580.51
	06/08/00	3,597.64	-	17.16	0.00	3,580.48
	06/09/00	3,597.64	-	17.16	0.00	3,580.48
	09/19/00	3,597.64	-	17.07	0.00	3,580.57
	12/19/00	3,597.64	-	17.06	0.00	3,580.58
MW - 21	02/16/00	3,596.88	-	15.98	0.00	3,580.90
	06/08/00	3,596.88	-	15.97	0.00	3,580.91
	06/09/00	3,596.88	-	15.96	0.00	3,580.92
	09/19/00	3,596.88	-	15.88	0.00	3,581.00
	12/19/00	3,596.88	-	15.91	0.00	3,580.97
MW - 22	02/16/00	3,598.34	-	17.23	0.00	3,581.11
	02/17/00	3,598.34	-	17.21	0.00	3,581.13
	06/09/00	3,598.34	-	17.23	0.00	3,581.11
	09/19/00	3,598.34	-	17.22	0.00	3,581.12
	12/19/00	3,598.34	-	17.24	0.00	3,581.10
MW - 23	02/16/00	3,598.07	-	17.83	0.00	3,580.24
	06/08/00	3,598.07	-	17.68	0.00	3,580.39
	06/09/00	3,598.07	17.68	17.68	0.00	3,580.39
	09/19/00	3,598.07	17.77	17.77	0.00	3,580.30
	12/19/00	3,598.07	17.80	17.80	0.00	3,580.27
MW - 24	02/16/00	3,598.01	-	16.97	0.00	3,581.04
	02/17/00	3,598.01	-	16.95	0.00	3,581.06
	06/09/00	3,598.01	-	16.98	0.00	3,581.03
	09/19/00	3,598.01	-	16.82	0.00	3,581.19
	12/19/00	3,598.01	-	16.97	0.00	3,581.04
MW - 25	02/16/00	3,599.25	-	18.79	0.00	3,580.46
	02/17/00	3,599.25	-	18.78	0.00	3,580.47
	06/09/00	3,599.25	-	18.88	0.00	3,580.37
	09/19/00	3,599.25	-	18.57	0.00	3,580.68
	12/19/00	3,599.25	-	18.71	0.00	3,580.54
MW - 26	NOT INSTALLED					
	06/08/00	3,595.26	-	14.73	0.00	3,580.53
	06/09/00	3,595.26	-	14.73	0.00	3,580.53
	09/19/00	3,595.26	-	14.68	0.00	3,580.58
	12/19/00	3,595.26	-	14.64	0.00	3,580.62
MW - 27	NOT INSTALLED					
	06/08/00	3,592.64	-	14.14	0.00	3,578.50
	06/09/00	3,592.64	-	14.13	0.00	3,578.51
	09/19/00	3,592.64	-	14.08	0.00	3,578.56
	12/19/00	3,592.64	-	14.09	0.00	3,578.55

**GROUND WATER ELEVATION
HISTORICAL TABLE**

**EOTT ENERGY CORPORATION
BOB DURHAM
MONUMENT, NEW MEXICO
ETGI PROJECT # EOT 2044C**

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUND WATER ELEVATION
MW - 28	NOT INSTALLED					
	07/13/00	3,598.02		DRY		
	09/19/00	3,598.02		DRY		
	12/19/00	3,598.02		DRY		
MW - 29	NOT INSTALLED					
	07/13/00	3,595.29	-	21.42	0.00	3,573.87
	09/19/00	3,595.29	-	21.55	0.00	3,573.74
	12/19/00	3,595.29	-	21.55	0.00	3,573.74
MW - 30	NOT INSTALLED					
	07/13/00	3,595.74	-	22.35	0.00	3,573.39
	09/19/00	3,595.74	-	22.27	0.00	3,573.47
	12/19/00	3,595.74	-	22.29	0.00	3,573.45
MW - 31	NOT INSTALLED					
	07/13/00	3,593.77	-	20.68	0.00	3,573.09
	09/19/00	3,593.77	-	21.03	0.00	3,572.74
	12/19/00	3,593.77	-	21.23	0.00	3,572.54
MW - 32	NOT INSTALLED					
	07/13/00	3,592.11	-	19.79	0.00	3,572.32
	09/19/00	3,592.11	19.67	19.76	0.09	3,572.43
	12/19/00	3,592.11	19.68	19.87	0.19	3,572.40
MW - 33	NOT INSTALLED					
	07/13/00	3,592.55	-	20.07	0.00	3,572.48
	09/19/00	3,592.55	-	19.99	0.00	3,572.56
	12/19/00	3,592.55	-	19.96	0.00	3,572.59
MW - 34	NOT INSTALLED					
	07/13/00	3,593.30	-	19.01	0.00	3,574.29
	09/19/00	3,593.30	-	19.19	0.00	3,574.11
	12/19/00	3,593.30	-	19.21	0.00	3,574.09
MW - 35	NOT INSTALLED					
	07/13/00	3,594.47	-	18.67	0.00	3,575.80
	09/19/00	3,594.47	-	18.73	0.00	3,575.74
	12/19/00	3,594.47	-	18.78	0.00	3,575.69
MW - 36	NOT INSTALLED					
	07/13/00	3,595.80	-	18.03	0.00	3,577.77
	09/19/00	3,595.80	-	18.13	0.00	3,577.67
	12/19/00	3,595.80	-	18.15	0.00	3,577.65

* Unable to gauge MW-18 on 12/19/00 due to drilling activities

ETGI

facsimile transmittal

To: Bill Olsen

Fax: 505 827-8177

From: Jesse Taylor

Date: 05/03/00

Re: Excavation Plan/Bob Durham

Pages: 5

☐ Urgent

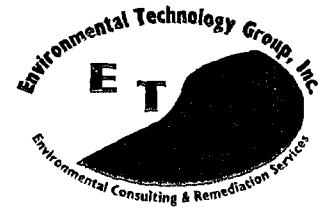
☒ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

Bill - As discussed - Hard Copy to follow - Jesse



May 3, 2000

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

RE: Bob Durham Release Site
NE1/4 NW1/4 Section 32, Township 19 South, Range 37 East, Lea County
Emergency Response - Phase Separated Hydrocarbon (PSH) Recovery

Dear Mr. Olsen:

As per our telephone discussion today, I am providing plans (attached) for the proposed recovery trench which will be placed primarily in the existing excavation. As we discussed, the excavation will then be backfilled temporarily until the PSH has been removed from the ground water. This should allow for the effective removal of PSH from near the release point while removing the safety hazard that the existing excavation represents. Once this installation is completed, a skimmer pump will be installed in the trench riser. This skimmer will be incorporated into the existing PSH recovery system.

Also as we discussed, the existing PSH recovery equipment has been operated on a daily basis since January 31, 2000. As of April 30, 2000, the system has recovered an estimated 8,585 gallons (204 barrels) of crude oil and approximately 60,631 gallons (1,443 barrels) of water, for a total fluid recovery of approximately 69,216 gallons (1,648). A Stage 1 Abatement Plan will be submitted within two weeks which will summarize all site activities including the PSH recovery system installation.

If you have any questions or comments, please telephone me at (505) 392-8731 or (915) 664-9166.

Sincerely;



Jesse Taylor

cc: Glenn Waldrop - EOTT Energy Corp.

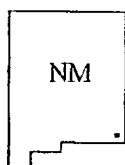
May 03 00 01:04p

Kim Taylor

(970)461-1058

p.3

ATTACHMENTS



QUADRANGLE LOCATION

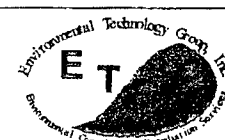
MONUMENT SOUTH QUADRANGLE
NEW MEXICO

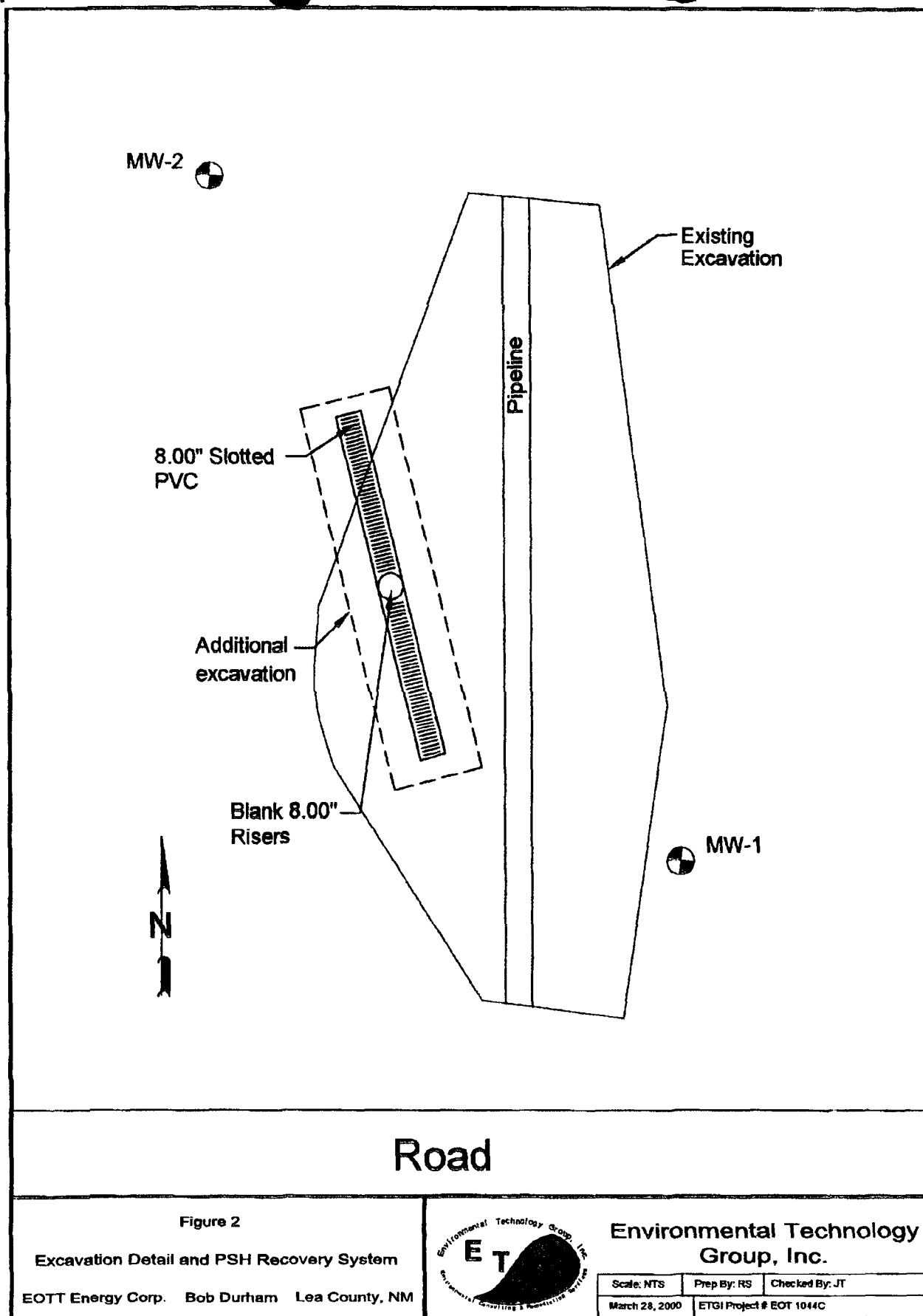
7.5 MINUTE SERIES (TOPOGRAPHIC)



FIGURE 1
SITE LOCATION

PROJECT NO.	PREPARED BY:
EOT 1044C	R. STEVENS
DATE	REVIEWED BY:
5-01-00	J. TAYLOR





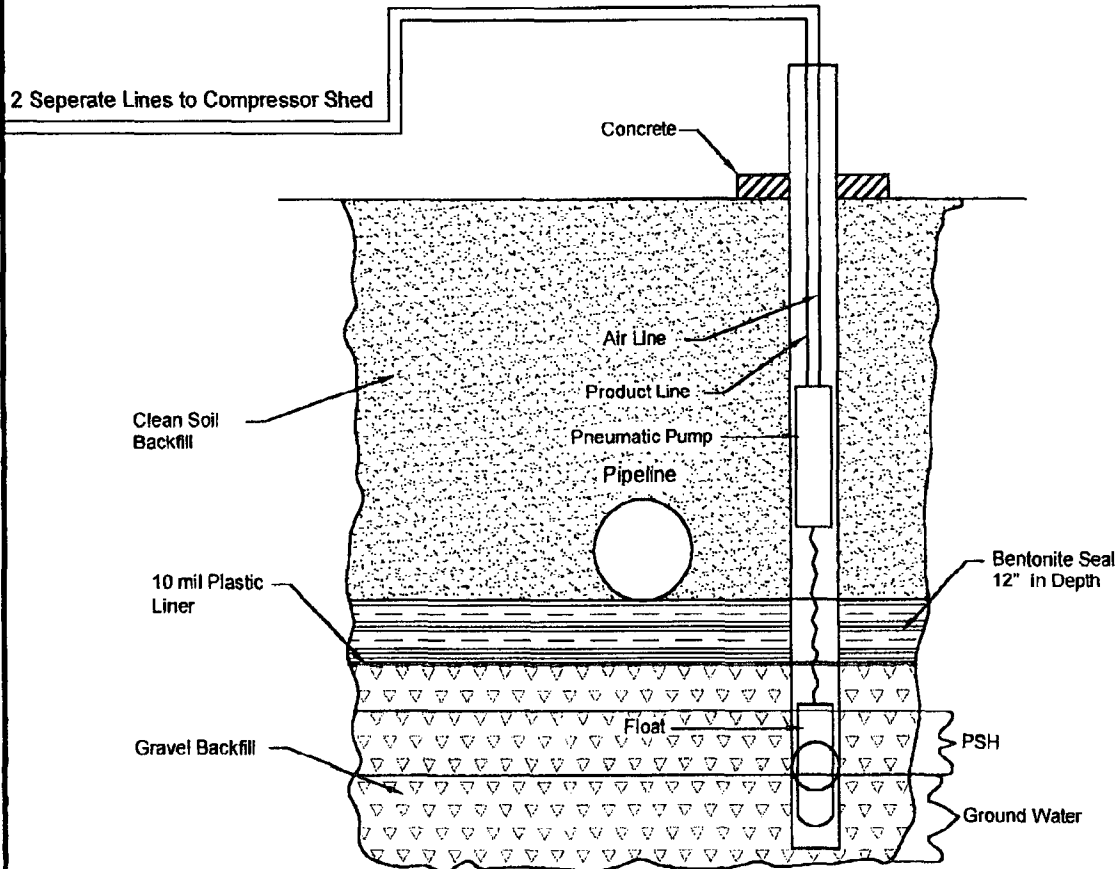


Figure 3

Cross-Section of Recovery System

EOTT Energy Corp. Bob Durham Lea County, NM

Environmental Technology
Group, Inc.

Scale: NTS

Prep By: RS

Checked By: JT

March 28, 2000

ETGI Project # EOT 1044C

Olson, William

From: Olson, William
Sent: Thursday, April 13, 2000 8:42 AM
To: 'Glenn_Waldrop@eott.com'
Subject: RE: REQUEST FOR EXTENSION AT BOB DURHAM SITE, LEA COUNTY, NEW MEXICO

The below requested extension is approved.

Sorry about the confusion on the site. In the previous EOTT submissions the site was called the "Old TNMPL Monument (Vacuum) 10" Pipeline" so I had it filed as that and not as the Bob Durham Site.

From: Glenn_Waldrop@eott.com [SMTP:Glenn_Waldrop@eott.com]
Sent: Thursday, April 13, 2000 8:08 AM
To: Olson, William
Subject: REQUEST FOR EXTENSION AT BOB DURHAM SITE, LEA COUNTY, NEW MEXICO

According to Entrix, we received a letter dated February 11, 2000 giving us sixty (60) days to submit an abatement plan for the Vacuum 10" at Monument (Durham site). We have the plan drafted but are currently making some revisions. Thanks!

----- Forwarded by Glenn Waldrop/Midland/Eott on 04/13/00 09:06 AM -----

Glenn Waldrop
To: wolson@state.nm.us
04/12/00 cc:
09:34 AM Subject: REQUEST FOR EXTENSION AT BOB DURHAM
SITE, LEA COUNTY, NEW
MEXICO

Good morning Bill!

The State of New Mexico has requested that we have a remediation plan in to you by April 14, 2000. Because of the recent changes in our personnel and the new direction we are headed with our environmental management we are requesting a two (2) week extension in delivering this report. If you grant the extension, the new due date would be April 28, 2000. We appreciate your consideration in this matter.

Respectfully,

Glenn E. Waldrop
District Manager
New Mexico Pipeline Operations
EOTT Energy Pipeline



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 11, 2000

CERTIFIED MAIL
RETURN RECEIPT NO: Z-559-572-901

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

**RE: GROUND WATER ABATEMENT PLAN (AP-16)
OLD TNMPL MONUMENT (VACUUM) 10" PIPELINE
LEA COUNTY, NEW MEXICO**

Dear Ms. Frost:

The New Mexico Oil Conservation Division (OCD) has reviewed EOTT Energy Pipeline Limited Partnership's (EOTT) January 27, 2000 "GROUND WATER CONTAMINATION, OLD TNMPL MONUMENT (VACUUM) 10" PIPELINE, LEA CO., NM". This document contains EOTT's notification of the discovery of free phase product on ground water during excavation of contaminated soils resulting from a crude oil pipeline spill at the Old TNMPL Monument (Vacuum) 10" Pipeline Site.

Pursuant to 19 NMAC 15.A.19.C.1, the OCD requires an abatement plan for the Old TNMPL Monument (Vacuum) 10" Pipeline Site to abate ground water pollution. To initiate the abatement plan process, the OCD requires that EOTT submit to the OCD by April 14, 2000 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.

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

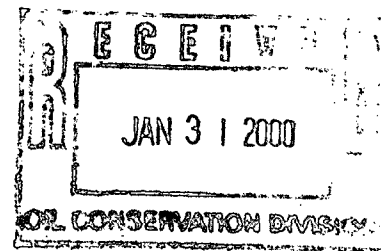
Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office

EOTT ENERGY Pipeline Limited Partnership

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



January 27, 2000

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

**RE: GROUND WATER CONTAMINATION
OLD TNMPL MONUMENT (VACUUM) 10" PIPELINE
LEA CO., NM**

Dear Mr. Olson:

On January 18, 2000, while excavating the above captioned pipeline for slip-lining, EOTT encountered a leak. The leak was clamped off. It appears from the contaminated soil around the leak that this may have been leaking for quite a while prior to our excavation.

On January 25, 2000 EOTT began delineation of the spill site by placing soil borings and/or monitor wells at the site. Ground water was encountered on several of the wells at this site. Upon gauging the wells it was found that there was free phase product on several of the monitor wells. We have delineated the up gradient side of the plume and have a clean well there. EOTT is in the process of determining the down gradient extent of the contamination.

Upon complete delineation of the site, EOTT will submit all subsurface investigation results along with our proposed remediation work plan at the site.

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

Sincerely,

A handwritten signature in cursive script that reads "Lennah Frost".

Lennah Frost
Sr. Environmental Engineer

cc: NMOCD - Hobbs
Glenn Waldrop
Mike Kelly