

AP - 020

## APPROVALS

YEAR(S):

2003-1999



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

October 20, 2003

Mr. Daniel Alexander  
MNA Enterprises Ltd.  
106 W. Alabama  
Hobbs, New Mexico 88242

**RE: ABATEMENT PLAN (AP-20)  
W.F. HANAGAN SWD LINE LEAK**

Dear Mr. Alexander:

The New Mexico Oil Conservation Division (OCD) has completed a review of MNA Enterprises, Ltd.'s (MNA) August 2003 document titled "MNA ENTERPRISES, LTD., W.F. HANAGAN, ABATEMENT PLAN AP-20, CLOSURE" which was submitted on behalf of MNA by their agent Eddie W. Seay. This document contains the results of MNA's remediation of contaminated soils related to MNA's W.F. Hanagan SWD Line which is located in the SE/4 SW/4 of Section 12, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico.

The soil remediation actions taken to date are satisfactory. Due to the fact that ground water was not found to be present atop the red bed at the site, the OCD rescinds abatement plan AP-20 and hereby approves of closure of remedial actions at the site. Please be advised that OCD approval does not relieve MNA of responsibility if remaining contamination poses a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve MNA of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact Bill Olson of my staff at (505) 476-3491.

Sincerely,

for Roger C. Anderson  
Environmental Bureau Chief

RCA/wco

cc: Chris Williams, OCD Hobbs District Office  
Eddie Seay  
Clay Osborn



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

June 23, 2003

Mr. Daniel Alexander  
MNA Enterprises Ltd.  
106 W. Alabama  
Hobbs, New Mexico 88242

**RE: STAGE 1 ABATEMENT PLAN (AP-20)  
W.F. HANAGAN SWD LINE LEAK**

Dear Mr. Alexander:

The New Mexico Oil Conservation Division (OCD) has completed a review of MNA Enterprises, Ltd.'s (MNA) May 12, 2003 document titled "MNA ENTERPRISES, LTD., STAGE 1 ABATEMENT (AP-20), W.F. HANAGAN" which was submitted on behalf of MNA by their agent Eddie W. Seay. This document contains MNA's Stage 1 Investigation Report of the extent of contamination related to MNA's W.F. Hanagan SWD Line which is located in the SE/4 SW/4 of Section 12, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. MNA is proposing to mitigate surface impacts and close the site by removing chloride impacted soils from the surface to a depth of approximately 4 feet and replacing them with clean soils due to the fact that ground water was not found to be present atop the red bed at the site.

Since ground water was discovered to be absent at the site, the above-referenced proposal is approved with the following conditions:

1. MNA shall obtain soil samples from the sides of the excavated area to verify that the horizontal extent of contamination was adequately remediated.
2. The soil samples shall be obtained and analyzed for concentrations of chlorides using EPA approved methods.
3. All wastes generated shall be disposed of at an OCD approved facility.

4. MNA shall submit a final closure report to the OCD Santa Fe Office by August 23, 2003 with a copy provided to the OCD Hobbs District Office. The report shall include:
  - a. A description and photographs of the closure activities.
  - b. A map showing the pipeline, leak area, excavated areas and any other relevant site features.
  - c. The disposition of all wastes generated.
5. MNA 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 relieve MNA of responsibility if the proposed work plan fails to adequately remediate contamination related to MNA's activities. In addition, OCD approval does not relieve MNA of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

cc: Chris Williams, OCD Hobbs District Office  
Eddie Seay  
Clay Osborn



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor  
**Betty Rivera**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 11, 2002

**CERTIFIED MAIL**

**RETURN RECEIPT NO: 7001-1940-0004-3929-7266**

Mr. Daniel Alexander  
MNA Enterprises Ltd.  
106 W. Alabama  
Hobbs, New Mexico 88242

**RE: STAGE 1 ABATEMENT PLAN (AP-20)  
W.F. HANAGAN SWD LINE LEAK**

Dear Mr. Alexander:

The New Mexico Oil Conservation Division (OCD) has completed a review of MNA Enterprises, Ltd.'s (MNA) March 15, 2002 document titled "ABATEMENT PLAN AP-20, W.F. HANAGAN" and November 19, 2001 correspondence titled "MNA ENTERPRISE LTD., ABATEMENT PLAN AP-20, W.F. HANAGAN SWD LINE" which was submitted on behalf of MNA by their agent Eddie W. Seay. This document contains MNA's proposed Stage 1 abatement plan and proof of public notice for the investigation of the extent of contamination related to MNA's W.F. Hanagan SWD Line which is located in the SE/4 SW/4 of Section 12, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico.

The Stage 1 Abatement Plan, as contained in the above-referenced documents, is approved with the following conditions:

1. All soil samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.
2. A sufficient number of the boreholes which encounter ground water will be converted to monitoring wells in order to determine the extent and magnitude of contamination and the hydrogeological characteristics of the site.
3. Each monitor well shall be completed as follows:
  - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.

- b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
  - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
  - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.
  - e. A concrete pad and locking well cover shall be placed at the surface.
  - f. The well shall be developed after construction using EPA approved procedures.
4. No less than 24 hours after the wells are developed, ground water from all monitor wells at shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, total dissolved solids (TDS) and major cations and anions using EPA approved methods and QA/QC.
5. All wastes generated shall be disposed of at an OCD approved facility or in an OCD approved manner.
6. MNA shall submit a Stage 1 investigation report to the OCD Santa Fe Office by August 11, 2002 with a copy provided to the OCD Hobbs District Office. The report shall include:
- a. A description of the investigation activities which occurred including conclusions and recommendations.
  - b. A geologic/lithologic log and well completion diagram for each borehole and monitor well.
  - c. A map showing the location of all water wells within one mile of the site.
  - d. A water table map showing the location of the spill, excavated areas, boreholes, monitor wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
  - e. Isopleth maps for contaminants observed during the investigations.
  - f. Summary tables of all soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
  - g. The disposition of all wastes generated.

7. MNA 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 relieve MNA of responsibility if the Stage 1 abatement plan fails to adequately determine the extent of contamination related to MNA's activities. In addition, OCD approval does not relieve MNA of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact Bill Olson of my staff at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger C. Anderson', written in a cursive style.

Roger C. Anderson  
Environmental Bureau Chief

RCA/wco

cc: Chris Williams, OCD Hobbs District Office  
Eddie Seay



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

November 23, 1999

MNA

Attn: Daniel Alexander  
106 W. Alabama  
Hobbs, New Mexico 88242

Re: W.F. Hanagan  
UL N-Sec 12, Ts25S-R36E

Dear Mr. Alexander:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of MNA's closure report on the above referenced location dated November 11, 1999. The NMOCD hereby approves of MNA's closure report.

Please be advised that NMOCD approval of this closure does not relieve MNA of liability should their operations fail to adequately investigate contamination that should pose a threat to groundwater, surface water, human health or the environment. In addition, NMOCD approval does not relieve MNA of responsibility for compliance with any other federal, state, or local laws and/or regulations. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505)393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor