



ENVIRONMENTAL PLUS, INC.

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STATE APPROVED LAND FARM AND ENVIRONMENTAL SERVICES

October 25, 2002

Mr. Lamar Stokes
Shell Pipeline Company
P.O. Box 3038
Pearland, Texas 77588-3038

Subject: Shell Grizzell Pump Remediation Site UL-L Sec 9 T22S R37E

Dear Mr. Stokes,

This letter summarizes the activities of Environmental Plus, Inc. (EPI) of Eunice, New Mexico in support of Shell Pipeline Company at the above referenced site.

On May 8, 2002 at about 7:00 P.M., EPI responded to the estimated 8 barrel crude oil leak at the pump station located adjacent to and east of Lea County Road E33 on property owned by Mr. Bill Trull. The area inundated by the spill was approximately 1,114 square feet. Recovered crude oil volume was 6 barrels. Mr. Trull's residence is approximately 100' due east of the site. The Trull water well is located approximately 30 feet north of the spill. Because this well is Mr. Trull's source of drinking and domestic use water, he had the well water sampled by EPI on May 22, 2002. The equalized well depth after sampling was 72.68 feet below ground surface ('bgs). The sample was analyzed by Cardinal Laboratories, Hobbs, New Mexico for Benzene (<0.002 mg/L), Toluene (<0.002 mg/L), Ethyl Benzene (<0.002 mg/L), and m,p,&o-Xylenes (<0.006 mg/L). The data supports the conclusion that the well had not been impacted above the instrument detection limits or the New Mexico Water Quality Control Commission (WQCC) drinking water standards.

The remediation strategy at the site was to remove all soil impacted above the New Mexico Oil Conservation Commission (NMOCD) guideline standards based on a site ranking score of 30 points, i.e., ground water 50-99'bgs = 10 and domestic water source <200' = 20 points. The remedial goals were;

- Total Petroleum Hydrocarbon EPA method 8015M (TPH^{8015m}) = 100 mg/Kg,
- Benzene = 10 mg/KG,
- BTEX the mass sum of Benzene, Toluene, Ethyl Benzene, and m,p,&o-Xylenes EPA method 8021B = 50 mg/Kg.

EPI excavated soil with calibrated Volatile Organic Headspace readings >50 ppm as determined by sidewall and bottom hole sampling. Laboratory samples were collected and analyzed in the laboratory to verify remedial goals had been achieved. The excavation depth approached 18'bgs in the area of the leak origin and graded to the surface horizontally roughly following the spill perimeter. The excavation was backfilled and contoured, the pump set, and the security fence reinstalled.

Shell PL - 127613
facility - FPAC0603351997
incident - nPAC0603352276
application - pPAC0603352403
inspect - ePAC0603352216

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To prevent future vertical impacts from leaks at the pump, Equilon proactively installed a compacted 1-2' thick clay barrier under the pump and replaced the subsurface collection basin/sump.

Soil contaminated above the remedial goals was disposed of in the NMOCD approved and permitted non-hazardous EPI landfarm Permit #NM-01-0013. Prior to disposal, because the soil waste was not exempt from the EPA RCRA regulations, i.e., 40 CFR 261, the hazardous characteristics of the soil were determined in accordance Part 261 Subpart C and found to be RCRA non-hazardous. Additionally the soil was transported under chain-of-custody from the site to the landfarm in accordance with Part 261 Subpart D.

Disposal volume was 1,270 cubic yards (yd³), clean backfill soil volume was 1,008 yd³, and clay volume was 21 yd³.

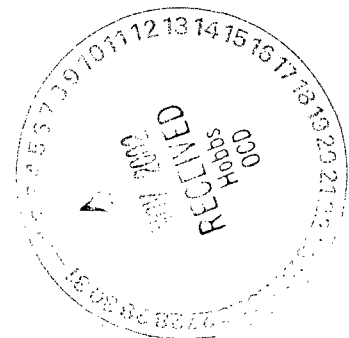
Maps and photographs of the site are attached.

If there are any questions or more information is needed please contact Mr. Ben Miller or myself at the office or at 505.390.0288 or 505.390.7864, respectively.

Sincerely,

Pat McCasland
EPI Technical Services Manager

cc: Ben Miller, EPI Vice President and General Manager
Sherry Miller, EPI President



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Equilon Site Information and Metrics

Incident Date and NMOCD Notified?

May 8, 2002 (not required)

SITE: Shell Grizzell Pump		Assigned Site Reference #:	
Company: Equilon			
Street Address: HCR 1			
Mailing Address: P.O. Box 89			
City, State, Zip: Denver City, Texas 79321			
Representative: Lannie Wood			
Representative Telephone: Office; 806.592.8186 Cell; 806.893.8615 FAX; 806.592.7479			
Telephone:			
Fluid volume released (bbls): 8 bbls		Recovered (bbls): 6 bbls	
>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: Shell Grizzell Pump			
Source of contamination: Crude Oil Pump Station			
Land Owner, i.e., BLM, ST, Fee, Other: Bill P. Trull			
LSP Dimensions 90' x 20'			
LSP Area: 1,114 ft ²			
Location of Reference Point (RP)			
Location distance and direction from RP			
Latitude: 32° 24' 10.60594"N			
Longitude: 103° 10' 34.51579"W			
Elevation above mean sea level: 3,405' amsl			
Feet from South Section Line			
Feet from West Section Line			
Location- Unit or ¼:		NW¼ of the SW¼	Unit Letter: L
Location- Section: 9			
Location- Township: T22S			
Location- Range: R37E			
Surface water body within 1000' radius of site:			
Domestic water wells within 1000' radius of site: 1360' south Bettis Water Station Well			
Domestic water wells within 1000' radius of site: 30' north Trull House Well			
Agricultural water wells within 1000' radius of site			
Public water supply wells within 1000' radius of site			
Depth from land surface to ground water (DG) 71.68' 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 private domestic water source: 20 points	
If Depth to GW 50 to 99 feet: 10 points		If >1000' from water source, or, >200' from private domestic water source: 0 points	
If Depth to GW >100 feet: 0 points		Wellhead Protection Area Score=20	
Ground water Score = 10		Surface Water Score = 0	
Site Rank (1+2+3) = 30			
Total Site Ranking Score and Acceptable Concentrations			
Parameter	>19	10-19	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

