

ExxonMobil
Refining & Supply Company
Global Remediation
16825 Northchase Drive
Houston, Texas 77060

ExxonMobil
Refining & Supply

March 3, 2006

Larry Johnson
Energy, Minerals, and Natural Resources Department
State of New Mexico Oil Conservation Division (NMOCD),
District I
1625 North French Drive
Hobbs, New Mexico

RE: New Mexico State K Tank Battery No. 3 Site Assessment and Remediation

Dear Mr. Johnson,

Per our phone conversation on February 22, 2006, please find enclosed the subject report describing remediation of naturally occurring radioactive material (NORM) and the assessment of soil for hydrocarbon concentrations exceeding the NMOCD Recommended Remediation Action Levels (RRALs). Attached to this cover letter are a C-141 form and a printout of a February 23, 2005 email approving the work plan.

A NORM survey was performed at the subject site on May 3, 2005. Based on the results of laboratory analyses, approximately six cubic yards of NORM-containing soil was excavated on July 6, 2005 and disposed per requirements established by the New Mexico Environment Department (NMED) on August 22, 2005. Confirmation samples demonstrate that excavation effectively removed all soil containing NORM above the NMED limits.

Eleven soil borings (SBs) were advanced on August 22-23, 2005 using an air rotary drilling rig. SBs were located in areas where NORM was remediated, areas where former production equipment appears to have been located, and areas where vegetation and/or surface soil appeared different than the native surface soil and vegetation. Cuttings were screened with a photoionization detector (PID) for the presence of hydrocarbons and three samples were obtained for laboratory analysis from each boring, for a total of 33 samples. All SBs were terminated at approximately 21 ft below ground surface due to the absence of hydrocarbon, as evidenced by visual inspection, olfactory inspection,

and screening with a PID. Groundwater was not encountered in any of the eleven SBs. Of the 33 samples collected, only the surface (1-2 ft) sample collected from SB-2 exhibited a total petroleum hydrocarbon (TPH) concentration greater than the RRAL of 1000 mg/kg.

The location of SB-2 was selected based upon the presence of apparent asphaltized soil (i.e. hardpan). The area of asphaltized soil measures approximately 3-4 ft in diameter. Attached to this letter is a photo showing the approximate location of SB-2 (Photo 1). Since deeper intervals sampled from SB-2 (15-16 ft and 20-21 ft) do not evidence TPH concentrations greater than the RRAL and all samples obtained from SB-2 are well below the RRAL for benzene, toluene, ethylbenzene, and xylenes (BTEX), the TPH identified in the upper 2 ft of SB-2 does not appear to be mobile or threaten groundwater. Consequently, ExxonMobil respectfully requests that the NMOCD consider issuing a letter of no further action for the subject site.

Thank you in advance for your time in evaluating the subject site. If you have questions or concerns regarding this letter or the accompanying report, please contact me by telephone at (281)654-8460 or by email at chris.clover@exxonmobil.com.

Sincerely,

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

Chris Clover
Project Manager

Enclosure

Photo 1: Approximate Location of SB-2, Former Location of New Mexico State K Tank Battery No. 3



District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: ExxonMobil Production Company	Contact: Chris Clover, ExxonMobil Refining & Supply, Global Remediation
Address: 6810 NW 8000, Andrews, TX 79714	Telephone No.: (281)654-8460
Facility Name: New Mexico State K Lease	Facility Type: Former Tank Battery Location

Surface Owner: State	Mineral Owner: Private	Lease No.: Unknown
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LOCATION OF RELEASE

Unit Letter	Section 32	Township 17S	Range 35E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude 32°47'25" N Longitude 103°28'30"W (NAD 1983)

NATURE OF RELEASE

Type of Release: Total Petroleum Hydrocarbons	Volume of Release: Unknown	Volume Recovered: Not Applicable
Source of Release: Historic Operations	Date and Hour of Occurrence: Unknown	Date and Hour of Discovery: Unknown
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*


Describe Cause of Problem and Remedial Action Taken.*

NORM and shallow hydrocarbon impact to soil identified in isolated areas of former tank battery location (the last date of operation and date of dismantlement are not known). Remedial action consisted of performing a NORM survey and installation of soil borings to assess potential soil/groundwater impact due to historic operations. NORM Survey performed on 5/3/05. Eleven soil borings installed on 8/22-8/23/05 to delineate potential hydrocarbon impact.

Describe Area Affected and Cleanup Action Taken.*

Two areas of former tank battery identified with NORM exposure readings warranting removal. One site was former heater treater location. The other appears to be site where NORM-containing scale was left. NORM excavation performed 7/6/05. Confirmation samples indicate all soil with NORM in excess of NMED limits removed. NORM disposal occurred on 8/22/05. Soil impacted by hydrocarbon is confined to surficial (<2 ft) horizon and appears to be due solely to presence of hardpan remaining at former stock tank location. Soil borings terminated at depth of 21 ft due to absence of hydrocarbon, as determined via field screening with a photoionization detector. Groundwater not encountered.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Chris Clover	Approved by District Supervisor:		
Title: Project Manager	Approval Date:	Expiration Date:	
E-mail Address: chris.clover@exxonmobil.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <u>3/3/06</u>	Phone: (281)654-8460		

Attach Additional Sheets If Necessary



"Johnson, Larry"
<LWJohnson@state.nm.us>

To: "chris.clover@exxonmobil.com" <chris.clover@exxonmobil.com>
cc:
Subject: RE: New Mexico State K Tank Battery No. 3 Site
Delineation/NORM Survey/NORM Remediation

02/23/05 08:09 AM

Chris,
Thanks for the schedule.
Larry

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

From: chris.clover@exxonmobil.com [mailto:chris.clover@exxonmobil.com]
Sent: Tuesday, February 22, 2005 10:21 AM
To: Johnson, Larry
Cc: tony.w.hord@exxonmobil.com; Buice, James
Subject: New Mexico State K Tank Battery No. 3 Site Delineation/NORM
Survey/NORM Remediation

Larry, to follow-up on our February 9 meeting, below is a tentative schedule for initiating the site delineation and NORM survey/remediation at the New Mexico State K Lease, Tank Battery No. 3:

NORM Decon Services is planning to perform the NORM survey during the week of March 14, 2005. The specific day has not been identified, though you will be given a minimum of two days advance notice. Samples taken during the survey will be analyzed and all areas confirmed to be 30 pCi/g over background will be remediated per the proposal I submitted to you.

If no elevated NORM exposure readings are observed in the areas where soil borings are planned, the delineation of hydrocarbon impacted soil will proceed while awaiting the results of the radionuclide analyses. Otherwise, the delineation will not proceed until all potential NORM areas are confirmed, excavated, and properly disposed. Once results of the subsurface delineation are received, a remediation plan will be developed and submitted to you for review/approval.

Again, I appreciate your and Paul's time in meeting with Larry, Doug, and me. Please let me know if you have any questions or concerns regarding the proposed schedule.

Best regards,

Chris Clover
ExxonMobil Refining & Supply
Global Remediation - Major Projects
GP2 Rm 917
Ph: 281-654-8460
Fx: 281-654-8487
Cell: 713-205-3064

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Bc:

Karla R. Holoman, CORP-EMB-291C

Bc: (cover letter only)

J. M. Hosman, CORP-WGR-1206

Charles W. Campbell, ExxonMobil Fullerton Field Office