

L3023 (SWR-REC)

DEC 17 1993

Mr. J. P. Schmitt, Manager  
Damage Assessment and  
Restoration Program  
Pollution Cleanup Division  
Texas Natural Resources  
Conservation Commission  
Post Office Box 13087  
Austin, Texas 78711-3087

Dear Mr. Schmitt:

We are writing to notify you of soil and shallow groundwater contamination resulting from long-term use of a sump and collection pit at Amoco Production Company's South Sprint Gas Collection Facility located within Padre Island National Seashore.

The South Sprint Gas Collection Facility was developed near the surface location of Well #1, when it was drilled in 1968. Well No. 1 is a deviated hole with the surface location on Padre Island and the bottomhole location under State Tract 980-S. The facility also serves Well No. 2, a straight hole located in State Tract 981-S, approximately 9,000 feet from Padre Island, and Well No. 3, a straight hole located in State Tract 983-S. Well No. 3 is not a producing well. The facilities for separation of the produced liquids from the gas are located approximately one-quarter of a mile from the beach on the Gulf side of the island.

Produced water from the above operations was disposed of in a sump on the site. An open pit was also available on the site for collection of overflow or drained fluids. In 1987, this operation became subject to the compliance requirements of the National Park Service's Non-Federal Oil and Gas Rights Regulations, found at Title 36 of the Code of Federal Regulations, Part 9, Subpart B, when Amoco requested additional surface use to add a compressor unit to the facility. During 1991-1992, the National Park Service requested Amoco to discontinue use of the sump and collection pit and to, instead, employ a containerized collection system with removal by a pump truck for disposal at a state-approved facility outside the National Seashore.

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In November 1993, Amoco Production Company submitted the attached preliminary site assessment, which confirms soil and shallow groundwater contamination from light volatile hydrocarbons (benzene, toluene, ethylbenzene and xylene) at their South Sprint Gas Collection Facility, and a request to implement Phase I of their Remediation Plan. Reserving the right to require additional characterization studies and appropriate remediation, the National Park Service approved the Phase I remediation plan for free phase recovery; and Amoco implemented it on November 30, 1993.

The National Park Service recognizes the Texas Natural Resource Conservation Commission's (TNRCC) responsibilities in surface and groundwater remediation and your experience in successful remediation efforts. In this regard, we invite the TNRCC to participate with the National Park Service, other state and Federal agencies, and Amoco Production Company to develop information that will characterize the nature and areal and vertical extent of contamination as well as an appropriate plan that will remedy the situation.

Should you have any questions or need additional information, please feel free to contact Linda Dansby, of my staff, at 505-988-6711.

Sincerely,

/s/ Mary R. Bradford

ACTING

Regional Director,  
Southwest Region

Enclosure

cc:

Mr. Charles Ross, Assistant Director, w/o enc.  
Regulatory Enforcement  
Oil and Gas Division  
Railroad Commission of Texas  
1701 N. Congress  
Austin, Texas 78711

Mr. Glenn Sekavec, w/o enc.  
Acting Regional Environmental Officer  
Department of the Interior  
Office of Environmental Policy  
and Compliance  
Post Office Box 649  
Albuquerque, New Mexico 87103

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Superintendent, Padre Island, w/o enc.  
Attention: Chief, Resources Management  
Environmental Protection Specialist

Field Solicitor, Santa Fe, New Mexico, w/o enc.

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