



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Southwest Region

P.O. Box 728

Santa Fe, New Mexico 87504-0728



L3023 (SWR-REC)

11/29/93

CERTIFIED-RETURN RECEIPT REQUESTED

Mr. James F. Trickett, Manager
Environmental Safety and Regulatory Affairs
Amoco Production Company
Southeast Business Unit
Post Office Box 3092
Houston, Texas 77253-3092

Reference: National Reponse Center Case #209214

Dear Mr. Trickett:

We have reviewed your Phase I Remediation Plan dated November 12, 1993, for the South Sprint Facility located within Padre Island National Seashore. The South Sprint Facility is permitted under an approved plan of operations dated December 14, 1987, pursuant to the National Park Service's Non-Federal Oil and Gas Rights Regulations, Title 36 of the Code of Federal Regulations, Part 9, Subpart B (36 CFR 9B). We give Amoco approval to proceed with the Phase I Remediation Plan, free phase recovery, with the following conditions:

1. Within 60 days of receipt of this letter, Amoco must submit a report to this office, Attention: Linda Dansby, Regional Minerals Coordinator, Division of Environmental Coordination, that explains the cause of contamination and describes what actions have or will be taken to modify the operations to cease current contamination and to preclude future incidents.
2. Our approval of Phase I does not suggest that the limited information and site characterization submitted with the Phase I Remediation Plan is adequate. We are not confident that just by looking at the volatile hydrocarbon components that we are getting the entire picture of the contaminants that may be present at this site. If the contamination has resulted from natural gas distillates, then the lighter fractions may be sufficient. However, if heavier crude fractions have been spilled or stored in the pit or sump areas, then additional scans

for poly-aromatic hydrocarbons and metals are needed. Some of the compounds associated with these chemical groups have a propensity to stay in the soils, or to sink in groundwater systems; therefore, deeper sampling of the aquifer may be warranted. A hydro-geologic survey may also be warranted.

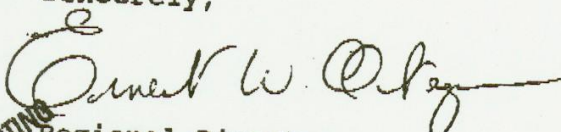
Within 60 days from the date of receipt of this letter, Amoco must submit a complete site assessment, including the volume and areal extent of contamination of free phase and dissolved hydrocarbons, benzene, toluene, ethylbenzene and xylene (BTEX), and metals, at a minimum. The estimated time period in which Phase I is expected to take must also be provided.

3. We do not anticipate that water will be recovered during the Phase I free phase recovery process. However, Amoco must advise the National Park Service if recovered waters are ultimately anticipated, and if so, how it will be collected and disposed of.

4. A monthly report documenting the amount of recovered free phase hydrocarbons must be submitted to this office, Attention: Linda Dansby, Regional Minerals Coordinator, Division of Environmental Coordination, with a carbon copy to the Superintendent, Padre Island National Seashore, 9405 South Padre Island Drive, Corpus Christi, Texas 78418-5597.

We look forward to working closely with you to ensure that contaminants are removed or remediated and the natural environment is restored. We will proceed to undertake coordination with appropriate state and Federal agencies to develop water quality attainment standards. Should you have any questions, please feel free to contact Linda Dansby, Regional Minerals Coordinator, in the Division of Environmental Coordination, at 505-988-6711.

Sincerely,


Ernest W. Ortiz
Regional Director,
Southwest Region

cc:

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

Mr. Fermin Munoz, Jr.
District Director
Oil and Gas Division 4
Railroad Commission of Texas
Post Office Box 10307
Corpus Christi, Texas 78460-0307, w/c of inc.

Mr. Glenn Sekavec
Acting Regional Environmental Officer
Department of the Interior
Office of Environmental Affairs
Post Office Box 649
Albuquerque, New Mexico 87103, w/c of inc.

Superintendent, Padre Island, w/o inc.

