BURLINGTON RESOURCES

> SAN JUAN DIVISION June 17, 1997

Goesto well File

Certified - 358 636 553

New Mexico Oil Conservation Division Attn. Denny Foust 1000 Rio Brazos Road Aztec. NM 87410

Re: Release - San Juan 30-6 Unit 112Y SWD Unit Ltr. A, Sec. 26, Township 30N, Range 6W

Dear Mr Foust:

As follow up to a recent produced water release from the above referenced facility, Burlington Resources is submitting the findings of the remediation investigation. This letter presents background information, describes the remediation investigation and concludes with a recommendation for remediation.

Background:

On March 26, 1997 100 barrels of produced water was released from the San Juan 30-6 Unit 112Y SWD (112Y SWD). The release resulted from a malfunction in a high level shut off switch. An earthen berm around the edge of the location burst under the pressure of the produced water allowing it to flow off the location and down into a steep canyon. A release report was completed and is enclosed (Enclosure 1).

The produced water flowed into a canyon to the North characterized by steep rocky walls scattered with Pinon and Juniper trees. The produced water flowed through an established drainage to the bottom of the canyon. Due to the steep canyon walls, precipitation run off velocities are high in the drainage. The high run off velocity naturally prevents vegetation from being established. A topographical map, which shows the location of the facility and the canyon can be found in Enclosure 2.

Site Investigation:

A Burlington Resources representative, Craig Bock, met on location with Bill Liese (BLM) and Denny Foust (NMOCD) March 27, 1997. It was agreed that Burlington Resources would take samples of the contaminated soils in the path of the off site flow. The steep canyon face was divided into three lifts. Lift 3 being the bottom of the canyon and Lift 1 being the first level downhill from the location pad. In addition to the contaminated soil samples, a corresponding background soil sample was taken on each Lift. Soil sample results are summarized in Enclosure 3.

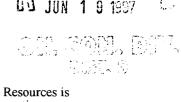
In 1990 Buys and Associates (B&A) was contracted to research and develop a contingency plan for releases of Fruitland Coal produced water. The final Plan concluded that produced water releases to soil need to be remediated only if the soil's ability to support native vegetation is affected or it poses a danger to human health.

As stated in the contingency plan, reclamation procedures are dependent on the results of soil samples taken within one day of the release. Each soil sample is analyzed and compared to background samples taken and documented in the B&A Plan. In this case the reclamation procedures as outlined in Enclosure 4 were followed. Reclamation of a release should take place only if the soils are determined, through analysis, to be *Saline* or *Sodic*.

Saline soils contain excess soluble salts that can increase the osmotic pressure of root systems. Plants consequently dehydrate and die because the uptake of water is significantly diminished. Saline soils are defined in the Plan as having an Electroconductivity (EC) greater than 4 mmhos/cm.

Sodic soils contain excess sodium (relative to other cations) on exchangeable surfaces in the soil. These conditions cause clay particles in the soil to disperse and lower the permeability of soil to air and water. Sodic soils often have a high pH and an exchangeable sodium percentage (ESP) greater that 15.

Soil sample results, summarized in Enclosure 3, indicate the soils are neither Saline nor Sodic. In other words the soil is capable of supporting vegetation.



Recommendation:

Burlington Resources recommends that no action be taken to remediate the soils contacted by the produced water. Information gathered during the site investigation supports this conclusion. Following is a summary of the results:

- Soils contacted by the produced water are capable of supporting native vegetation.
- Natural factors at the site such as the steep canyon walls and high precipitation run off velocities may
 naturally prevent native vegetation from being established anyway.
- The steep canyon would cause the remediation activity to be extremely difficult and dangerous.
- A remediation action for produced water impacted soils would include flushing the soil with fresh water. This action will naturally take place because the produced water was released into an established drainage channel for precipitation. Any rain event will flush the soil with fresh water.

Please send written confirmation of your agreement to Burlington Resources Attn. Craig Bock. If further clarification of the information in this letter is needed, please contact Craig Bock at (505) 326-9537.

Sincerely,

Craig/A. Bock Environmental Representative

Enclosure 1: Release Report
Enclosure 2: Topographical Map
Enclosure 3:: Sample Results Summary
Enclosure 4: Reclamation Procedures

Bill Liese - BLM Farmington Keith Baker - BR

Keith Boedecker - BR

OIL COM. DIV.

Enclosure 1

District I - (505) 393-6161 P. O. Box 1940 Hobbs. NM 88241-1980 District II - (505) 748-1283 811 South First Artesia, NM 88210 District III - (505) 334-6178 1000 Rio Brazos Road Aztec, NM 87410

State of New Mexico

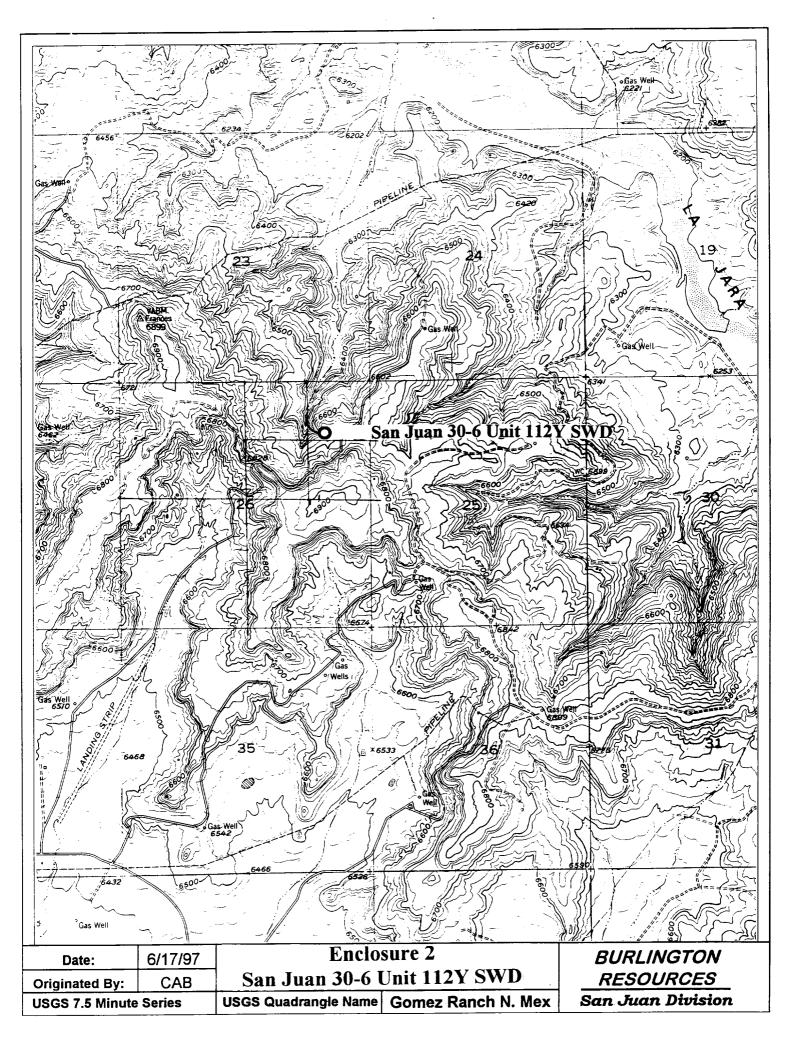
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131
Certified P 358 636 543

Form C- 141 Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116

District IV	(505) 827-7131									
		Releas	se Notification			tive Action				
			OP	PERATO	OR		X	Initial Report	Final R	Leport
Name I	Burlington Resc	ources			Contac	Craig A. B				
Address	P.O. Box 4289	***			Telepho	one No. (505) 326-	9537			
Facility Nam	san Juan 30-6 U	Jnit #112Y			Facility	Type Salt Water	Dis	posal		
										
Surface Own	ner Burlington Resc	ources	Mineral Owner	Burlin	gton	Resources		Lease No.	A	
	·		LOCATION				<u></u>			
Unit Letter A	Section Township 26 30N	Range Feet from to	he North/South Lir	ne Feet fi	rom the	East/West Line	County	Rio Arr	iba	
· · · · · ·	 		NATURE (OF REI	EASE				-	
Type of Relea	Produced Wat	ter			Volume	of Release	BBLS	Volume Recov	ered O	
Source of Re	lease				Date as	nd Hour of Occurrence	DE .	Date and Hour	of Discovery	
Holding tank run over				3-26	5 - 97 , 12 : 00	рm	3-26-97	, 12:00 p	m	
Was Immedi	ate Notice Given?	Yes No	Not Required			To Whom? ny Foust				
By Whom?	Craig A. Boo					nd Hour 5-97, 1:06 p	om			
Was a Wate	rcourse Reached?				If YES,	Volume impacting to	he Water	course.		
		Yes No					gagginale dige (g. , co	# * * * * * * * * * * * * * * * * * * *	the with the second	· a' a wee
If a Waterco	urse was Impacted, Descri	be Fully.*								
							land to	PEGE	IVE	
	use of Problem and Remed						E	1 JUN 1 9	1987 L	7
Hold	ling tank ran o	over due to hig	h level shu	it-off	malfu	inction.		And the second	and the second	7
Describe Are	a Affected and Cleanup A	action Taken.*								
Flui	id ran over the	e location and	broke throu	gh the	bern	ı. Fluid le	eft tl	he locatio	n and	
flov	ved down a clif to be determine	ff into an unna	med wash.	Fluid	soake	ed into the	soil.	. Remedia		
Describe Ger	neral Conditions Prevailing	g (Temperature, Precipitatio	on, etc.).*							
55 d	legrees F									
I hereby certi my knowledg Signature:		ven above is true and comp	piete to the best of			OIL CONS	ERVATI	ON DIVISION		
Printed Nam	c Craig A. H	Bock		Approved District	d by Supervise	oc:				
Title:	Environmer			Approva			Ежрі	iration Date:		
Date	4-14 07		26-9537	Conditi	ions of A	pproval:	!	Attached	<u></u>	

^{*} Attach Additional Sheets If Necessary



Enclosure 3

30-6 Unit 112Y SWD Release Soil Sample Results

Est. Release Volume: 100 bbls

Discovery Date: 2/26/97

		Electro- Conductivity		Na	Ca	Mg		CEC	ES
Sample No.	Hd	(mmhos/cm)	SAR	(mmolc/L)	(mmolc/L)	(mmolc/L) (mmolc/L) ESP (%)	ESP (%)	(meq/100g)	(meq'100g)
112YB1	8.10	0.151	0:30	0:30	2.60	0.40	0.00	29.50	00'0
112YB2	7.20	0.242	09.0	0.70	2.10	0.30	0.00	20.00	00.00
112YB3	7.40	0.161	0.40	090	3.30	0.40	000	33.90	00.00
Average	7.57	0.185	0.43	0.53	2.67	0.37	0.00	27.80	0.00
112YL1	8.80	999'0	9.10	12.10	2.70	08.0	1.10	25.00	28.00
112YL2	9.50	1.720	14.40	16.70	2.30	0.40	1.70	38.20	00.99
112YL3	8.00	0.987	3.40	11.20	17.80	4.50	0.40	37.10	13.00
Average	8.77	1.124	8.97	13.33	2.60	1.90	1.07	33.43	35.67
				Backgru	Background Soil Ranges	sagu			
	Ī	Taken from Buys and Associates' FRUITLAND COAL RECLAMATION PROCEEDURES Report, 1990.	nd Associates	'FRUITLAND	COAL RECI	AMATION P.	ROCEEDUR	ES Report, 199	.00
Vessilla Soil	7.9 - 8.97	0.158 - 0.282	0.05 - 0.37	1.4 - 8	25 - 62	2.05 - 6.33	0.08 - 0.3	2.05 - 6.33 0.08 - 0.3 10.10 - 26.9 0.01 - 0.07	0.01 - 0.07
Orlie Soil	7.9 - 8.45	0.168 - 0.267 0.19 - 1.45	0.19 - 1.45	3.9 - 27	15 - 36	3.51 - 10.3	0.3 - 1.14	15 - 36 3.51 - 10.3 0.3 - 1.14 14.7 - 18.8	0.04 - 0.21

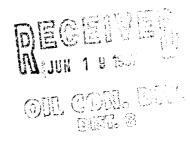
112Y B1 - Background soil sample Level 1.

112Y B2 - Background soil sample Level 2.

112Y B3 - Background soil sample Level 3.

112YL1 - Impacted area soil sample Level 1. 112YL2 - Impacted area soil sample Level 2.

112YL3 - Impacted area soil sample Level 3.





Project ID:

112 Y Release

Date Reported:

04/21/97

Sample ID:

112 Y B1

Date Sampled:

03/27/97

Laboratory ID: 6574

6574

Time Sampled:

11:00

Sample Matrix: Soil

Date Received:

03/27/97

Parameter		Analytical Result	Units
General			
	Lab pH	8.1	s.u.
	Conductivity	151	μmhos/cm
Sodium Abso	orption Ratio (SAR)	0.3	
	Sodium	0.3	mmolc/L
	Calcium	2.6	mmolc/L
	Magnesium	0.4	mmolc/L
Exchangeabl	le Sodium Percentage (ESP)	0.0	
Cation Excha	ange Capacity	29.5	meq/100 g soil
	Exchangeable Sodium	0.0	meq/100 g soil

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR

Method S - 0017: Saturated Soil Paste

Quie //



Project ID:

112 Y Release

Sample ID:

112 Y L1

Laboratory ID: 6573

Sample Matrix: Soil

Date Reported:

04/21/97

Date Sampled:

03/27/97

Time Sampled:

11:00

Date Received:

03/27/97

Parameter		Analytical Result	Units
General			
	Lab pH	. 8.8	s.u.
	Conductivity	. 666	μmhos/cm
Sodium Abs	orption Ratio (SAR)	9.1 .	
	Sodium .	12.1	mmolc/L
	Calcium	2.7	mmolc/L
	Magnesium	0.8	mmolc/L
Exchangeat	le Sodium Percentage (ESP)	1.1	%
Cation Exch	ange Capacity	25	meq/100 g soil
	Exchangeable Sodium	28	meq/100 g soil

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR .

Method S - 0017: Saturated Soil Paste



Project ID:

112 Y Release

Date Reported:

04/21/97

Sample ID:

112 Y B2

Date Sampled:

03/27/97

Laboratory ID: 6576

Time Sampled:

11:00

Sample Matrix: Soil

Date Received:

03/27/97

Parameter		Analytical Result	Uni ts
General			
	Lab pH	7.2	s.u.
	Conductivity	242	μ mhos/cm
Sodium Absor	rption Ratio (SAR)	0.6	
	Sodium	0.7	mmolc/L
	Calcium	2.1	mmolc/L
	Magnesium	0.3	mmolc/L
Exchangeable	Sodium Percentage (ESP)	0.0	
Cation Exchar	ıge Capacity	20.0	meq/100 g soil
•	Exchangeable Sodium	0.0	meq/100 g soil

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR

Method S - 0017: Saturated Soil Paste

wire pho



Project ID:

112 Y Release

Date Reported:

04/21/97

Sample ID:

112 Y L2

Date Sampled:

03/27/97

Laboratory ID: 6575

Time Sampled:

11:00

Sample Matrix: Soil

Date Received:

03/27/97

Parameter	Analytical Result	Units
General		
Lab pH	9.5	s.u.
Conductivity	1,720	μ mhos/cm
Sodium Absorption Ratio (SAR)	14.4	
Sodium	16.7	mmolc/L
Calcium	2.3	mmolc/L
Magnesium	0.4	mmolc/L
Exchangeable Sodium Percentage (ESP)	1.7	
Cation Exchange Capacity	38.2	meq/100 g soil
Exchangeable Sodium	66	meq/100 g soil

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR

Method S - 0017: Saturated Soil Paste

Citic Al-Review



Project ID:

112 Y Release

Date Reported:

04/21/97

Sample ID:

112 B3

Date Sampled:

03/27/97

Laboratory ID: 6578

Time Sampled:

11:00

Sample Matrix: Soil

Date Received:

03/27/97

Parameter	Analytical Result	Units
General	i in a managagaga e ta a ta a ta a ta a ta a ta a	
Lab pH	. 7.4	s.u.
Conductivity	. 161	μmhos/cm
Sodium Absorption Ratio (SAR)	0.4	
Sodium	0.6	mmolc/L
Calcium	3.3	mmolc/L
Magnesium	0.4	mmolc/L
Exchangeable Sodium Percentage (ESP)	0.0	
Cation Exchange Capacity	33.9	meq/100 g so
Exchangeable Sodium	0.0	meq/100 g soi

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR

Method S - 0017: Saturated Soil Paste

Claire PD
Review



Project ID:

112 Y Release

Date Reported:

04/21/97

Sample ID:

112 Y L3

Date Sampled: ·

03/27/97

Laboratory ID: 6577

Time Sampled:

11:00

Date Received:

Sample Matrix: Soil

03/27/97

Parameter	Analytical Result	Units
General	<u>alian a comprimes resultable de la Cabert</u>	
Lab pH	8.0	s.u.
Conductivity	. 987	μmhos/cm
Sodium Absorption Ratio (SAR)	3.4	
Sodium	11.2	mmolc/L
Calcium	17.8	mmolc/L
Magnesium	4.5	mmolc/L
Exchangeable Sodium Percentage (ESP)	0.4	
Cation Exchange Capacity	37.1	meq/100 g so
Exchangeable Sodium	13	meq/100 g so

Reference

Western States Program; Ver. 4.00 (1/15/97)

Method S-1.60: Saturation Paste Extract, Ca, Mg, Na, and SAR

Method S - 0017: Saturated Soil Paste

Donie M Review

Enclosure 4

Saltwater Release Reclamation Procedures

- Identify vendors of materials; stockpile materials where appropriate.
- Collect soil samples when threshold volume of 10 barrels is reached.
- Begin reclamation if soil is *Saline* of *Sodic*. None of the further action described below is required if soil is neither *Saline* nor *Sodic*.
- Additional spills of any volume at sites that did not previously require further action necessitate resampling.
- Identify soil present. Soils underlying wells and gathering systems are identified on the following maps:

Meridian San Juan 30-6: Plate 4-1 Meridian San Juan 31-6: Plate 4-2

Blackwood & Nichols La Jara, Simms Mesa, Middle Mesa and Pump Mesa: Plate 4-3

Meridian San Juan 32-9: Plate 4-4 Meridian Pump Canyon: Plate 4-5 Meridian Cedar Hill: Plate 4-6 Meridian Middle Mesa Plate: 4-7 ARCO Atlantic: Plate 4-8

ARCO Atlantic: Plate 4-8
ARCO Pump Canyon: Plate 4:9

- Apply gypsum amendments and native grass mulch or aged manure. Amendment rate is specified in Table 9-2. Apply native grass mulch at the rate of 2 to 2.5 tons per acre or aged manure at the rate of 10 to 29 tons per acre. Disk or manually apply amendments to 1 foot or bedrock whichever is shallower.
- Promptly leach with water. Amounts are specified in Table 9-2. Impound water where practical.
- Seed area with salt-tolerant grasses and shrubs during the period of July 1 to September 15.
 Plant species are Alkali sacaton, Western wheatgrass, Fourwing saltbrush and Indian ricegrass. Used a seed mixture of 25% of each at a rate of 4.5 pounds PLS per acre. The methods of seeding should be the same as are required by the BLM for plugged and abandoned well sites. Desert or Inland saltgrass sprigs or sets may also be transplanted from other areas.

Taken from "FINAL REPORT RECLAMATION PROCEDURES FRUITLAND COAL WELLS" Buys and Associates, Inc. Oct. 19, 1990.