

3R - 087

**GENERAL
CORRESPONDENCE**

2013



**CONESTOGA-ROVERS
& ASSOCIATES**

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April 5, 2013

Reference No. 074943

Mr. Glenn von Gonten
New Mexico Oil Conservation Division
1220 South Saint Francis Dr.
Santa Fe, NM 87505

Dear Mr. von Gonten:

Re: Work Plan for Plug and Abandonment Activities
ConocoPhillips Federal Com. 15 Unit A
API #30-045-20078
NMOCD #3R-087

Conestoga-Rovers & Associates (CRA), environmental consultant for ConocoPhillips Risk Management and Remediation (ConocoPhillips), herein submits a work plan to conduct monitor well plugging and abandonment activities at the Federal Com. No. 15 Unit A (Site) located in Section 1, Township 29N, Range 13W, of San Juan County, NM.

A formal request for no further action status at the Site was requested of the New Mexico Oil Conservation Division (NMOCD) by ConocoPhillips and Tetra Tech in a report dated July 22, 2010. The scope of work presented in this work plan includes activities for plugging and abandonment of Site monitor wells as permitted by the NMOCD in their *Response to Closure Request* letter dated November 9, 2012 (**Attachment A**).

CRA proposes to plug and abandon all existing Site monitor wells. **Figure 1** shows the general location of the Site and **Figures 2** shows the general Site layout and Site details including monitor well locations.

SCOPE OF WORK FOR PLUGGING AND ABANDONMENT ACTIVITIES/REPORTING

CRA proposes the following scope of work:

- Preparation of this work plan, monitor well plugging, and abandonment procedure to fulfill the expectations of the NMOCD and the New Mexico Office of the State Engineer (NMOSE) in regards to the Site-specific requirements. This task includes review of existing data, preparation of this work plan, Site health and safety plan, and submittal of a Well Plugging and Abandonment Plan of Operations document to the NMOSE for approval prior to the commencement of work.
- Proposed field activities include the abandonment of Monitor Wells MW-1, MW-2, MW-3, MW-4, and MW-5. All monitor wells are approximately 20 feet deep, constructed with 2-inch PVC, and 8-inch manhole-cover surface completions. Monitor well abandonment

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procedures will be performed in accordance with all federal, state, and local regulations. Monitor well abandonment will be supervised by a qualified scientist or technician and the details recorded in the Site field book. The monitor wells will be plugged and abandoned by National Exploration Wells and Pumps (National EWP) of Peralta, NM. Plugging and abandonment of each well will be completed by backfilling the PVC casing with a cement/bentonite grout from total depth to surface using a tremie pipe. A concrete plug will be placed over top of the PVC casing cut at least six inches below grade. All surface completions will be removed and the surface will be restored to grade with native soil or concrete. Demolition debris will be hauled off site by National EWP and disposed of at a ConocoPhillips-approved landfill.

- A monitor well plugging and abandonment report will be prepared and submitted to the NMOCD detailing the monitor well plugging and abandonment field activities. In addition, an individual Plugging Record will be submitted for each monitor well to the NMOSE upon completion of plugging and abandonment activities.

Monitor well plugging and abandonment activities are estimated at two working days and are tentatively scheduled to commence the week of April 22, 2013. If during the course of this project, CRA determines that additional tasks are advisable or additional data collection will be required beyond the scope of work, approval will be obtained prior to proceeding.

CRA is prepared to implement the above scope of work immediately upon receipt of NMOCD approval. Should you have any questions or comments regarding this submittal, please contact me at 505-884-0672.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Kelly Blanchard

KB/cd/1
Encl.

c.c.: Terry Lauck, ConocoPhillips

FIGURES



FIGURE 1.

Site Location Map
 ConocoPhillips Company
 Federal Com No.15 Unit A
 Section 1, Township 29N, Range13W
 San Juan County, NM



 Approximate ConocoPhillips
 Federal #15 Site location

Latitude = 36.759339 deg N
 Longitude = -108.149891 deg W



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ConocoPhillips High Resolution Aerial Imagery 2008

FIGURE 2.

Site Layout Map
 ConocoPhillips Company
 Federal Com No.15 Unit A
 Section 1, Township 29N, Range 13W
 San Juan County, NM

LEGEND

-  Monitoring Well
-  Well Head
-  General Site Boundary
-  Produced Water Tank
-  Condensate Tank
-  Berm



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ATTACHMENT A

NMOCD RESPONSE TO CLOSURE REQUEST LETTER

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John Bemis
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



NOVEMBER 9, 2012

Mr. Terry Lauck
Site Manager
ConocoPhillips Company
Risk Management & Remediation
420 South Keeler Avenue
Bartlesville, OK 74004

Re: Site Closure Request of July 22, 2010 for Federal No. 15 (3R-087)
Site Closure Request of July 22, 2010 for Shepherd & Kelsey No. 1 (3R-097)
Site Closure Request of March 22, 2012 for Shepherd & Kelsey No. 1E (3R-098)

Dear Mr. Lauck:

After meeting with you on November 6, 2012, and after conducting a file review, the Oil Conservation Division (OCD) has determined that ConocoPhillips has completed corrective action for releases as required by 19.15.29.11 NMAC at the three remediation sites listed below.

3R-087	ConocoPhillips Federal No. 15
3R-097	ConocoPhillips Shepherd & Kelsey No. 1
3R-098	ConocoPhillips Shepherd & Kelsey No. 1E

OCD has closed these three cases in its database. ConocoPhillips may plug and abandon all monitor wells and remove all remediation equipment. Please include a copy of this closure approval letter when you submit your Annual Ground Water Monitoring Report.

If you have any questions, please contact Jim Griswold at 505-476-3465. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, reading "Glenn von Gonten".

Glenn von Gonten
Senior Hydrologist

GvG/gvg