



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

January 13, 2006

Royce Boyce rboyce@btaoil.com

**RE: French #3 SWD
 Unit Letter H Section 24T-18S R-32E Lea County, NM
 Larson and Associates Request for Variance of Plan Approved on 1-12-05**

Dear Mr. Boyce:

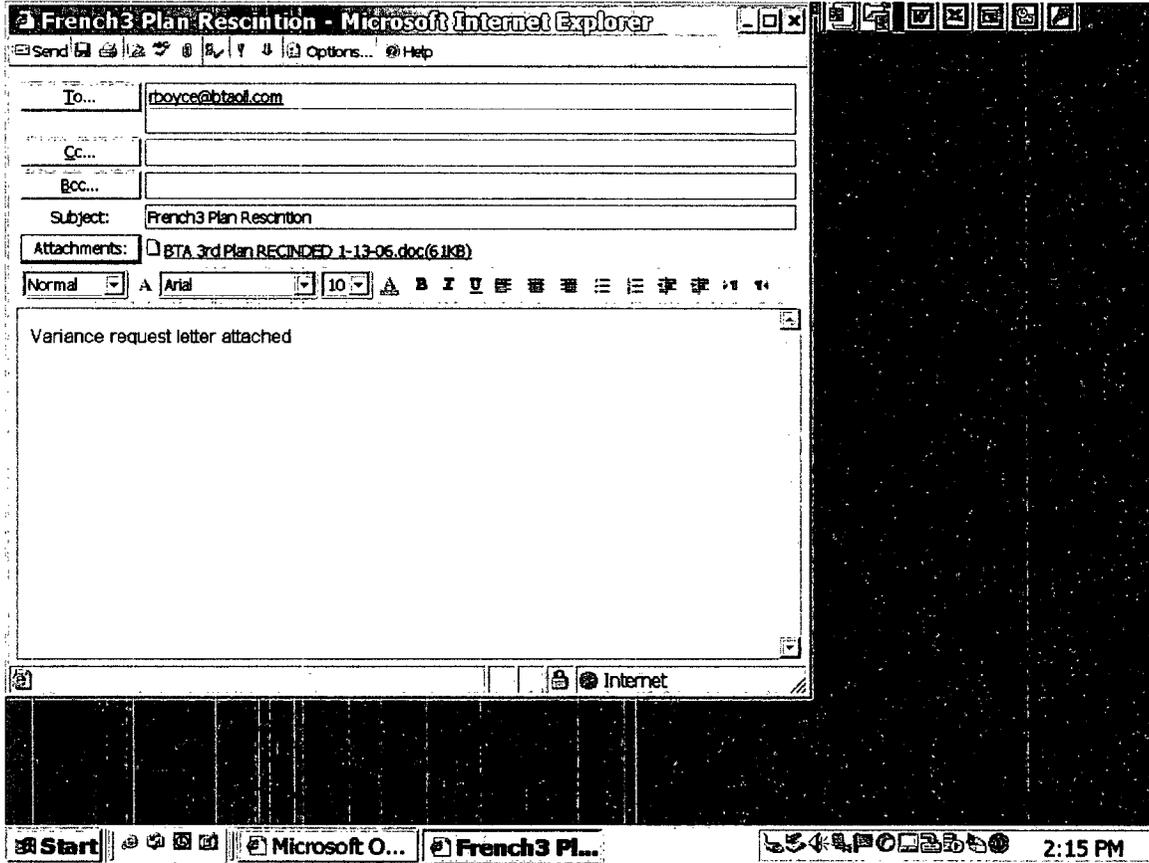
The New Mexico Oil Conservation Division (OCD) has reviewed the request submitted by Larson and Associates (LAS) as agent of BTA Oil Producers (BTA). The plan approved on January 5, 2006 is hereby **rescinded** until OCD receives the requested variance is received in writing. Please submit the revised plan for review by January 23, 2006.

If you have any questions, please e-mail or contact me at 505-393-6161 x 111.

Sincerely,

Larry Johnson - Environmental Engineer

Cc: Roger Anderson - Environmental Bureau Chief
 Chris Williams - District I Supervisor
 Paul Sheeley-Environmental Engineer





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Order #24

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

January 5, 2006

Royce Boyce rboyce@btaoil.com

WTR 15th

*E-MAILED
1.5.06 @ 11:15 AM
JQ*

**RE: French #3 SWD
Unit Letter H Section 24T-18S R-32E Lea County NM
Larson and Associates Proposal Dated December 29, 2005**

Dear Mr. Boyce:

The New Mexico Oil Conservation Division (OCD) has reviewed the information submitted by Larson and Associates (LAS) as agent of BTA Oil Producers (BTA). The plan is **hereby approved** with the following conditions:

1. BTA shall complete this remediation project by March 10, 2006.
2. BTA shall provide notification by email to paul.sheeley@state.nm.us and larry.johnson@state.nm.us 48 hours in advance of any final sampling, backfilling and/or construction activities allowing OCD the opportunity to witness the activities and split samples.
3. BTA shall submit a final closure report that documents all remediation activities and has the final C-141 report attached as the last page. Photo documentation of the initial site and completed site should be considered as supporting documentation.
4. BTA shall restore the surface to productive condition.

Please be advised that OCD approval of this plan does not relieve BTA of liability should their operations fail to adequately investigate and remediate contaminants that threaten ground water, surface water, human health or the environment. In addition, OCD approval does not relieve BTA of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions, please e-mail or contact me at 505-393-6161 x 111.

Sincerely,

Larry Johnson - Environmental Engineer

**Cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor
Paul Sheeley-Environmental Engineer**

December 29, 2005

Mr. Larry Johnson
New Mexico Oil Conservation Division – District 1
1625 North French Drive
Hobbs, New Mexico 88240

**Re: Spill Remediation Workplan, BTA Oil Producers, French #3 SWD,
Unit Letter H (SE/4, NE/4), Section 24, Township 18 South, Range 32 East,
Lea County, New Mexico**

Dear Mr. Johnson:

Please find enclosed a copy of the above-referenced workplan. The workplan is submitted on behalf of BTA Oil Producers., and presents the proposed soil remediation activities to be conducted by Larson and Associates, Inc.

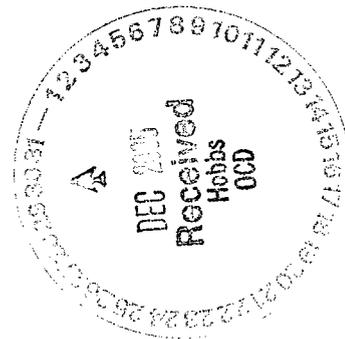
Please call Royce Boyce at (432) 682-3753 or myself at (432) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, P.G.
Project Manager

cc: Royce Boyce – BTA
Pam Inskeep - BTA



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are in Feet		UTM are in Meters)			Start	Finish	Depth	Depth (in feet)
X	Y	UTM Zone	Easting	Northing	Date	Date	Well	Water
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		13	622253	3621213	03/29/1957	03/30/1957	100	35

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T 01/13/2006

(quarters are 1=NW 2=NE 3=SW 4=SE)
 (quarters are biggest to smallest)

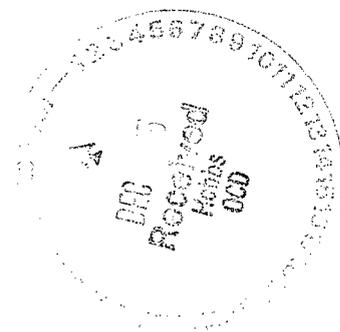
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L 03454 APPRO	Shallow	185	33E	30	2	2						13	622253

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December 29, 2005

Mr. Larry Johnson
New Mexico Oil Conservation Division – District I
Energy, Minerals and Natural Resources Department
1625 N. French Drive
Hobbs, New Mexico 88240



Re: Spill Remediation Workplan, BTA Oil Producers, French #3 SWD, Unit Letter H (SE/4, NE/4), Section 24, Township 18 South, Range 32 East, Lea County, New Mexico (Latitude: 32.73537 / Longitude: 103.71243)

Dear Mr. Johnson:

BTA Oil Producers (BTA) has retained Larson and Associates, Inc. (LA) to remediate impacted soil from a salt water spill that occurred on July 12, 2005, from a salt water tank located in the southeast quarter (SE/4) of the northeast quarter (NE/4), Section 24, Township 18 South, Range 32 East, Lea County, New Mexico (Site). The spill occurred when the valve for the load line off the tank was opened by livestock. Approximately 200 to 300 barrels (bbl) of produced water was released, and approximately 140 bbl of free liquid was picked up with a vacuum truck. The spill area covered approximately 140 x 200 feet, and BTA submitted a Release Notification and Corrective Action form (Form C-141) to the New Mexico Oil Conservation Division (NMOCD) on July 20, 2005, along with a work plan to conduct an investigation of the impacted soil at the Site. Figure 1 shows the location of the Site.

On July 26, 2005, BTA received a letter from the NMOCD, approving their work plan for investigation. A Spill Remediation Workplan, including details of the soil investigation, was submitted on September 23, 2005, and was denied by the NMOCD. On November 28, 2005, a Spill Remediation Workplan was submitted to the NMOCD, proposing remediation of the affected area via application of salt eating bacteria (Salt-B-Gone). The second workplan was denied by the NMOCD on December 14, 2005. Larson and Associates, Inc. (LA) is pleased to submit this subsequent work plan for remediation at the French #3 SWD site.

Initial Investigation

On September 6 and 7, 2005, LA installed nine (9) soil borings (BH-1 through BH-9) at the site using direct-push technology (Terraprobe®) to assess the horizontal and vertical limits of the spill for defining the area of remediation. One (1) background soil boring (BH-10) was installed 100 feet north of the tank battery. Figure 2 shows the locations of the soil borings. Table 1 provides a summary of the laboratory analyses of soil samples.

As reported on September 23, 2005, soil samples collected from each boring (BH-1 through BH-10) reported TPH concentrations below the test method detection limit. Chloride concentrations in soil are shown to reduce with depth at borings BH-3, BH-4, BH-7, but increased (specifically at a depth of approximately 10-12' bgs) at borings BH-1, BH-2, BH-5, BH-6, BH-9 and background boring BH-10.

Mr. Larry Johnson
Page 2
December 29, 2005

Proposed Remediation

BTA proposes to conduct excavation of the impacted soil at the site in the vicinity of borings BH-1, BH-2, BH-5, BH-6 and BH-9 (to a depth of approximately 15 feet bgs), in the vicinity of boring BH-3 (to a depth of approximately 10 feet bgs), and in the vicinity of boring BH-4 (to a depth of approximately 2 feet bgs), until analytical results of soil samples report chloride concentrations below 250 mg/L (above background). Excavated soil will be hauled to a NMOCD approved disposal facility. Analytical results from final confirmation samples will be reported to the NMOCD prior to backfilling of the excavation.

If you have any questions or need additional information, please call either myself at (432) 687-0901 or Royce Boyce, with BTA, at (432) 682-3753. We may also be reached by email at Cindy@LAenvironmental.com or RBoyce@btaoil.com.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, P.G.
Project Manager

cc: Royce Boyce, BTA
Pam Inskeep, BTA

TABLE

Table 1
Summary of Laboratory Analyses of Soil Samples
BTA Oil Producers, French #3 SWD
SE/4, NE/4, Section 24, Township 18 South, Range 32 East
Lea County, New Mexico

Boring Number	Sample Depth (Feet)	Sample Date	PID (ppm)	GRO C6-C12 (mg/kg)	DRO >C12-C35 (mg/kg)	TPH C6-C35 (mg/kg)	Chloride (mg/kg)
BH-1	0-2	09/06/05	2.4	---	---	---	598
	2-4	09/06/05	2.5	<10.0	<10.0	<20.0	172
	6-8	09/06/05	1.5	---	---	---	1,750
	10-12	09/06/05	1.4	---	---	---	9,110
BH-2	0-2	09/06/05	12.3	---	---	---	327
	2-4	09/06/05	34.7	<10.0	<10.0	<20.0	177
	6-8	09/06/05	7.1	---	---	---	7,910
	10-12	09/06/05	2.7	---	---	---	5,190
BH-3	0-2	09/06/05	12.7	---	---	---	20,300
	2-4	09/06/05	1.2	<10.0	<10.0	<20.0	973
	6-8	09/06/05	0.9	---	---	---	407
	10-12	09/06/05	0.6	---	---	---	11.1
BH-4	0-2	09/06/05	1.1	---	---	---	21,300
	2-4	09/06/05	1.1	<10.0	<10.0	<20.0	83.8
	6-8	09/06/05	1.0	---	---	---	6.08
BH-5	0-2	09/06/05	2.1	---	---	---	571
	2-4	09/06/05	2.7	---	---	---	86.8
	6-8	09/06/05	3.2	<10.0	<10.0	<20.0	301
	10 - 12	09/06/05	1.2	--	--	--	4,590
BH-6	0-2	09/06/05	1.1	--	--	--	153
	2-4	09/06/05	1.1	<10.0	<10.0	<20.0	96
	6-8	09/06/05	1.0	--	--	--	4,810
	10-12	09/06/05	0.6	--	--	--	7,940
BH-7	0-2	09/07/05	0.6	---	---	---	116
	2-4	09/07/05	0.7	<10.0	<10.0	<20.0	79.3
	6-8	09/07/05	0.7	---	---	---	9.08
	10-12	09/07/05	0.5	---	---	---	35.8

Table 1
Summary of Laboratory Analyses of Soil Samples
BTA Oil Producers, French #3 SWD
SE/4, NE/4, Section 24, Township 18 South, Range 32 East
Lea County, New Mexico

Boring Number	Sample Depth (Feet)	Sample Date	PID (ppm)	GRO C6-C12 (mg/kg)	DRO >C12-C35 (mg/kg)	TPH C6-C35 (mg/kg)	Chloride (mg/kg)
BH-8	0-2	09/07/05	0.7	---	---	---	40.6
	2-4	09/0705	0.7	---	---	---	53.9
	6-8	09/07/05	0.8	<10.0	<10.0	<20.0	136
	10-12	09/07/05	0.7	---	---	---	155
BH-9	0-2	09/07/05	0.9	---	---	---	147
	2-4	09/07/05	0.6	<10.0	<10.0	<20.0	12.2
	6-8	09/07/05	1.0	---	---	---	21.3
	10-12	09/07/08	2.1	<10.0	<10.0	<20.0	7,750
BH-10 (Background)	0-2	09/07/05	2.0	<10.0	<10.0	<20.0	65.4
	2-4	09/07/05	0.7	---	---	---	208
	6-8	09/07/05	0.4	---	---	---	129
	10-12	09/07/05	0.1	---	---	---	1,100

Notes: Analysis performed by Environmental Lab of Texas, I. Ltd., Odessa, Texas

1. Feet: Depth in feet below ground surface
2. GRO: Gasoline range organics
3. DRO: Diesel range organics
4. TPH: Total petroleum hydrocarbons (Sum of DRO + GRO)
5. mg/kg: Milligrams per kilogram
6. <: Below method detection limit
7. ppm: Parts per million
8. ---: No data available

FIGURES

SITE LOCATION

R-32-E

R-33-E

CORBIN OIL

GRAPHIC SCALE IN FEET

0 2000' 4000'

FIGURE #1

LEA COUNTY, NEW MEXICO

BTA Oil Producers

FRENCH #3 SWD
SEC. 24, T-18-S, R-32-E

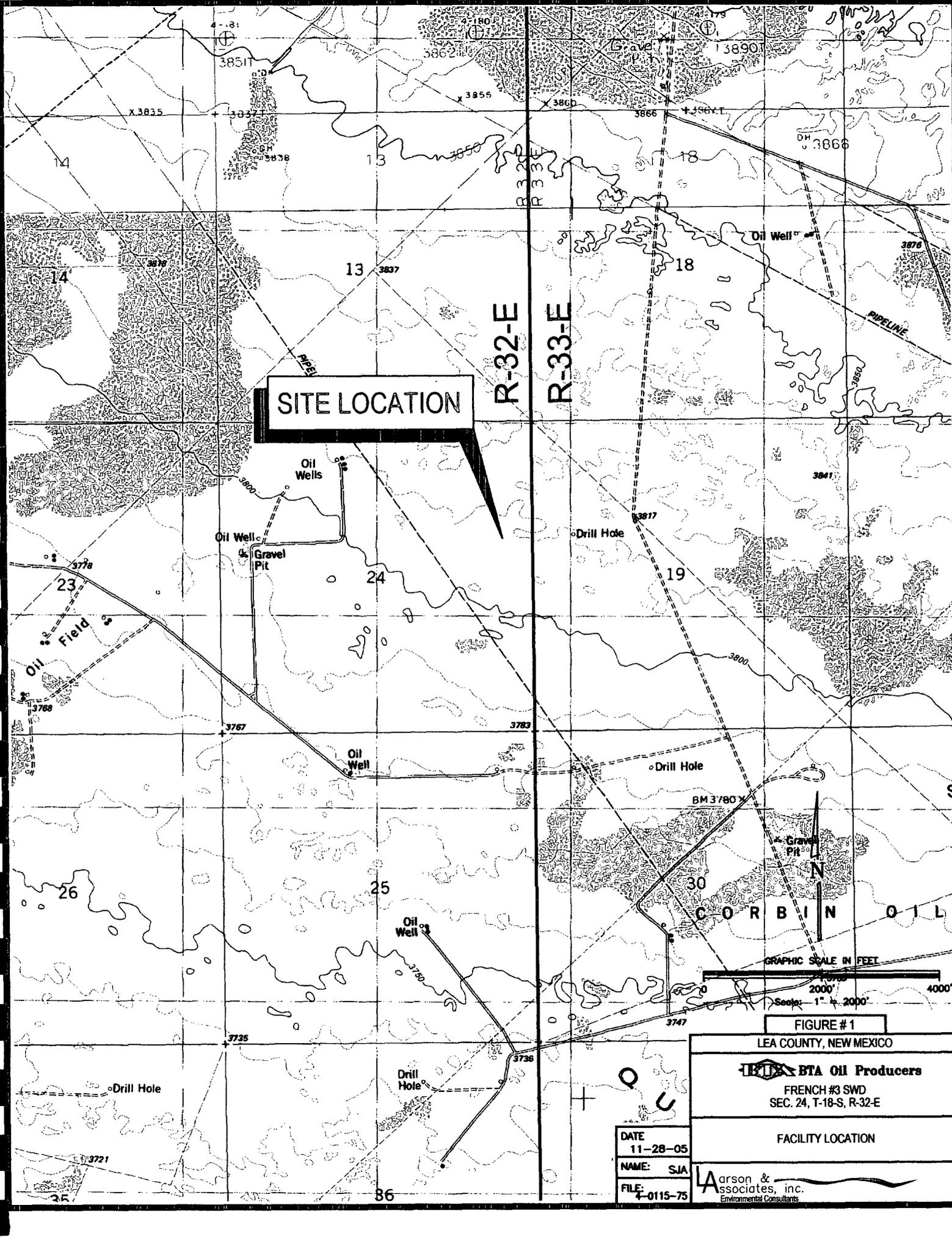
FACILITY LOCATION

DATE
11-28-05

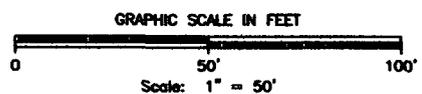
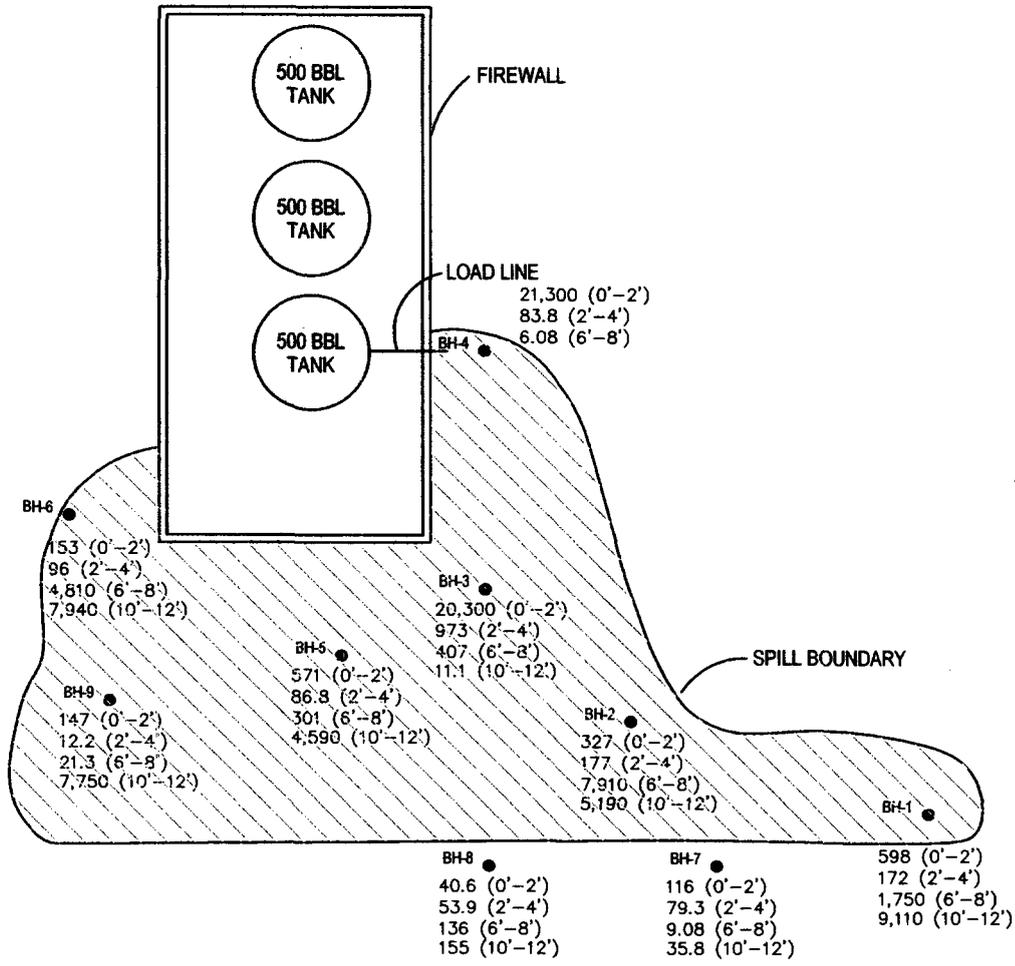
NAME: SJA

FILE: 4-0115-75

Larson & Associates, Inc.
Environmental Consultants



BH-10
 65.4 (0'-2')
 208 (2'-4')
 129 (6'-8')
 1,100 (10'-12')



LEGEND

BH-1
 598 (0'-2')

GEOPROBE BORING LOCATION WITH CHLORIDE CONCENTRATION (MG/KG) AND DEPTH (FEET) IN SOIL 9/6 AND 9/7/05

FIGURE #2
 LEA COUNTY, NEW MEXICO

BTA Oil Producers
 FRENCH #3 SWD
 SEC. 24, T-18-S, R-32-E

SITE DRAWING

DATE
 11-28-05

NAME: SJA

FILE: 4-0115-75

Arson & Associates, inc.
 Environmental Consultants