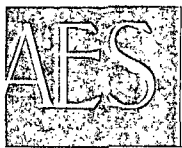


GW - 55

**GENERAL
CORRESPONDENCE**

YEAR(S):
2009



Animas Environmental Services, LLC

624 E. Comanche, Farmington, NM 87401, Tel: 505-564-2281, Fax: 505-324-2022, www.animasenvironmental.com

RECEIVED

2009 DEC 1 AM 11 55

November 25, 2009

Ed Hansen
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Soil Sampling Plan for the Thriftway Refinery, 626 County Road 5500, Bloomfield, New Mexico

Dear Mr. Hansen:

On behalf of Thriftway Company (Thriftway), Animas Environmental Services, LLC (AES) is providing this soil sampling plan in response to the November 9, 2009 meeting between the New Mexico Oil Conservation Division (OCD), Thriftway, and AES.

In the November 9, 2009 meeting, OCD and Thriftway agreed that confirmation soil sampling will be conducted upon termination of the active phase of the treatment designed to remove Non-Aqueous Phase Liquid (NAPL) contamination from the most heavily contaminated areas of the property. Until that time, AES/Thriftway are proposing a general soil sampling plan so that the remediation approach can be approved by OCD and work to begin the active NAPL remediation can begin.

In general, the plan for conducting soil confirmation sampling is currently proposed as follows:


- 1) Within 3 months of completing the interim cleanup of NAPL, AES/Thriftway will prepare and submit a detailed work plan for conducting the soil confirmation sampling, which will be based on the preliminary approach outlined in items #2 through #6 below.
- 2) At the end of NAPL removal, Thriftway/AES will conduct the installation of test pits in the actively treated area;
- 3) AES/Thriftway anticipate completing approximately 40-50 test pits to adequately cover the treated area at the same level of detail as for the contaminant delineation work previously conducted;
- 4) During test pit completion, AES will log soils and record volatile soil gas readings using a Photo-Ionization Detector/Organic Vapor Meter (PID/OVM);
- 5) Based on PID/OVM readings, AES/Thriftway will collect approximately one (1) laboratory confirmation sample per ten (10) test pits; and
- 6) Laboratory results will be presented to OCD with a summary letter report documenting the activities and findings of the soil confirmation sampling event.



AES and Thriftway appreciate the opportunity to provide this interim soil sampling plan and anticipate finalizing the arrangements to begin initial operation of the interim NAPL remediation system by the end of 2009.

If you have any questions regarding this proposed work plan, please contact me or Ross Kennemer at (505) 564-2281.

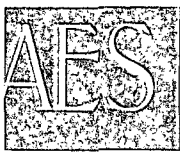
Sincerely,



Blaine Watson, P.G.
Sr. Project Manager

cc: Robert Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401

Brandon Powell
New Mexico Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410



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1220 S. St. Francis Drive
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If you have any questions regarding this proposed work plan, please contact me or Ross Kennemer at (505) 564-2281.

Sincerely,

A handwritten signature in cursive script that reads "Blaine Watson".

Blaine Watson, P.G.
Sr. Project Manager

cc: Robert Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401

Brandon Powell
New Mexico Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410

Hansen, Edward J., EMNRD

From: Robert Moss [robertgmoss@me.com]
Sent: Wednesday, November 04, 2009 11:14 AM
To: Hansen, Edward J., EMNRD
Cc: Powell, Brandon, EMNRD; 'Ross Kennemer'; 'Beth McNally'; VonGonten, Glenn, EMNRD
Subject: RE: Meeting Regarding Thriftway Bloomfield Refinery (GW-55)

That sounds good. We'll see you then.

Bob

Robert G. Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401
Direct Line: 505-564-6804
Fax Line: 888-649-0627

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From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Tuesday, November 03, 2009 4:42 PM
To: Robert Moss
Cc: Powell, Brandon, EMNRD; Ross Kennemer; Beth McNally; VonGonten, Glenn, EMNRD
Subject: RE: Meeting Regarding Thriftway Bloomfield Refinery (GW-55)

1:00 p.m. on Monday, the 9th, in the OCD Conference Room on the 3rd Floor of the Wendell Chino Bldg., 1220 S. St. Francis Dr. it is then.

Let me know if you need directions.

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Robert Moss [mailto:robertgmoss@me.com]
Sent: Tuesday, November 03, 2009 4:25 PM
To: Hansen, Edward J., EMNRD
Cc: Powell, Brandon, EMNRD; 'Ross Kennemer'; 'Beth McNally'; VonGonten, Glenn, EMNRD
Subject: RE: Meeting Regarding Thriftway Bloomfield Refinery (GW-55)

Mr. Hansen:

Is 1:00 PM okay?

Thanks,

Robert G. Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401
Direct Line: 505-564-6804
Fax Line: 888-649-0627

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From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Tuesday, November 03, 2009 4:14 PM
To: Robert Moss
Cc: Powell, Brandon, EMNRD; Ross Kennemer; Beth McNally; VonGonten, Glenn, EMNRD
Subject: RE: Meeting Regarding Thriftway Bloomfield Refinery (GW-55)

Dear Mr. Moss,
Monday, the 9th, sometime in the afternoon would be best for us – just let us know what is a good time for you.
Thanks,

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Robert Moss [mailto:robertgmoss@me.com]
Sent: Tuesday, November 03, 2009 3:49 PM
To: Hansen, Edward J., EMNRD
Cc: Powell, Brandon, EMNRD; 'Ross Kennemer'; 'Beth McNally'; VonGonten, Glenn, EMNRD
Subject: Meeting Regarding Thriftway Bloomfield Refinery (GW-55)

Mr. Hansen:

We have checked our schedules and our preference would be to meet either the afternoon of Monday, November 9 or the afternoon of Tuesday, November 10. Attending would be myself and R.J. Dalley on behalf of Thriftway Company, and Ross Kennemer of Animas Environmental Services. Please let me know what date works best for your office and we will set it on our calendars.

Thank you,

Robert G. Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401
Direct Line: 505-564-6804
Fax Line: 888-649-0627

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From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Monday, November 02, 2009 4:07 PM
To: Robert Moss
Cc: Powell, Brandon, EMNRD; Ross Kennemer; Beth McNally; VonGonten, Glenn, EMNRD
Subject: RE: Periodic Progress Report Approval (GW-55) for the Thriftway Bloomfield Refinery

Dear Mr. Moss,
Just about any time Tuesday through Thursday (after 10:00 a.m. on Thursday) of this week we could meet.
Next week would be Monday or Tuesday after 1:00 p.m.
The following week (the 16th through the 19th) is also open.
The meeting would have to be here in Santa Fe or you could set up a teleconference.
Let me know if you have any questions regarding our schedule.
Thanks,

Edward J. Hansen
Hydrologist
Environmental Bureau

From: Robert Moss [mailto:robertgmoss@me.com]
Sent: Friday, October 30, 2009 12:25 PM
To: Hansen, Edward J., EMNRD
Cc: Powell, Brandon, EMNRD; 'Ross Kennemer'; 'Beth McNally'
Subject: RE: Periodic Progress Report Approval (GW-55) for the Thriftway Bloomfield Refinery

Mr. Hansen:

Thank you for your response to Thriftway Company's Periodic Progress Report for the above referenced facility.

Thriftway Company continues to have concerns regarding the sampling requirements set out as conditions in your e-mail. As you may be aware, Thriftway Company is, and has for the last several years, been an essentially dormant corporation with no current business activities and, accordingly, no inflow of cash. As a result, Thriftway Company is very mindful of its finite resources and wants to proceed efficiently and devote as much of its finances as possible toward actual hydrocarbon contamination removal at the site. Thriftway Company understands that monitoring is an essential component of remediation to gauge progress at the site. However, we need to discuss with OCD what frequency of sampling will yield truly meaningful data given the breadth and scope of the project.

Accordingly, Thriftway Company requests a meeting with yourself and any other necessary OCD personnel involved with this project to discuss the sampling requirements. Additionally, we believe a site visit would be very beneficial at this time so that OCD can view the progress made to date. Our environmental consultants at Animas Environmental Services would be in attendance to discuss the issues at hand and answer any questions you might have.

Please let me know at your earliest convenience what dates and times you would be available for such a meeting.

Thank you,

Robert G. Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401
Direct Line: 505-564-6804

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From: Hansen, Edward J., EMNRD [mailto:edwardj.hansen@state.nm.us]
Sent: Thursday, October 29, 2009 4:47 PM
To: rgmoss@redmesa.com
Cc: Powell, Brandon, EMNRD; Ross Kennemer; Beth McNally
Subject: Periodic Progress Report Approval (GW-55) for the Thriftway Bloomfield Refinery

**RE: Periodic Progress Report Approval
for the Thriftway's
Thriftway Bloomfield Refinery Release Site (GW-55)
626 County Road 5500, Bloomfield, San Juan County, New Mexico**

Dear Mr. Moss:

The New Mexico Oil Conservation Division (OCD) has received the periodic progress report for the above-referenced site, dated October 28, 2009, and has conducted a review of the report. The report substantially meets the requirements of 19.6.2 NMAC. Therefore, the OCD hereby approves the report subject to the following conditions (in addition to the conditions set forth in the CAP approval):

1. *For the first year of implementing the plan, Thriftway must sample groundwater quarterly and submit a groundwater analytical report to the OCD within 45 days of each sampling event.* However, the following parameters may be analyzed on an annual basis: 8260B parameters (not including BTEXN and MTBE), GRO, DRO, MRO, RCRA 8 metals, Calcium, Magnesium, Potassium, Sodium, Bromide, Fluoride, Specific Conductance and Hardness. The remaining parameters must continue to be analyzed on a quarterly basis: listed field parameters, BTEXN, MTBE, Chloride, Sulfate and TDS.
2. *Thriftway must submit to the OCD for review and approval a soil sampling plan within 10 days.* The plan may be part of the multi-phase extraction wells installation (e.g., soil samples could be taken with the installation of the wells).

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau



Animas Environmental Services, LLC

624 E. Comanche . Farmington, NM 87401 . TEL 505-564-2281 . FAX 505-524-2028 . www.animasenvironmental.com

RECEIVED
2009 OCT 28 AM 10 56

October 27, 2009

Brad Jones
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Notification of Remediation Well Installations at the Thriftway Refinery, 626
County Road 5500, Bloomfield, New Mexico**

Dear Mr. Jones:

On behalf of Thriftway Company (Thriftway), Animas Environmental Services, LLC (AES) is providing notification to the New Mexico Oil Conservation Division (OCD) that installation of the first 19 multi-phase extraction (MPE) wells will begin on Monday, November 2, 2009 at the Former Thriftway Refinery. Well installation and development operations are anticipated to take approximately two weeks to complete.

If you have any questions regarding the scheduled site activities, please contact me at (505) 564-2281.

Sincerely,

Ross Kennemer
Project Manager

Cc: Robert Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401

Ed Hansen
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Brandon Powell
New Mexico Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410

Files:2009/ThriftwayCompany/Refinery/NMOCD 102709



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2009 OCT 9 AM 10 42

October 8, 2009

Brad Jones
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Progress Report for the Thriftway Refinery, 626 County Road 5500,
Bloomfield, New Mexico**

Dear Mr. Jones:

On behalf of Thriftway ~~Company~~ (Thriftway), Animas Environmental Services, LLC (AES) is providing an update to the New Mexico Oil Conservation Division (NMOCD) on the progress made toward refinery dismantling and remediation of hydrocarbon contaminated soil and groundwater. Tasks completed since June 2008 are described below.

1. In June and July 2009, Tank #17, 18, 19 and 21 were emptied of residual oil and cleaned. As with the tanks cleaned in 2008, all recovered oil and wash water was transported to Western Refinery for recycling. Following cleaning, each tank was inspected by Western Refinery personnel and determined to be satisfactory.
2. Between August 19 and 24, 2009, groundwater monitoring and sampling was completed. A monitoring and sampling report is being prepared and will be submitted to the NMOCD by the end of October 2009.
3. In September 2009, most of the crude oil and finished product piping was cleaned and removed for scrap. Waste water associated with pipe cleaning was taken to Basin Disposal, and the pipe insulation was disposed of at the Waste Management Landfill on Crouch Mesa.
4. A Storm Water Pollution Prevention Plan (SWPPP) for construction activities was prepared to cover site grading and leveling in preparation for installing the multi-phase extraction (MPE) wells. The Notice of Intent (NOI) was filed electronically with the United State Environmental Protection Agency (USEPA) Region 6 on September 16, 2009.
5. Between September 23 and 25, Phase I and II remediation areas were leveled and graded to facilitate operation of the drilling rig that will be used to install MPE wells.
6. On September 29, 2009, an Application to Appropriate Groundwater was submitted to the New Mexico State Engineer for MPE-1 through MPE-19. Applications for additional MPE wells will be submitted at a later date.

Once the installation and operation of the MPE wells is approved by the State Engineer, MPE-1 through MPE-19 will be permitted and will then be installed shortly after.



If you have any questions regarding the scheduled site activities, please contact me at (505) 564-2281.

Sincerely,



Ross Kennemer
Project Manager

Cc: Robert Moss
Thriftway Company
501 Airport Drive, Suite 100
Farmington, New Mexico 87401

Brandon Powell
New Mexico Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410

Files:2009/ThriftwayCompany/Refinery/NMOCD 100809