

SAN JUAN DIVISION

April 15, 1997

Certified P 358 636 576

**Denny Foust
Environmental Geologist
Oil Conservation Division
Aztec District Office
1000 Rio Brazos Road
Aztec, New Mexico 87410**

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APR 16 1997
OIL CON. DIV.
DIST. 3

**RE: Plan of Action
Hampton 4M - Unit Ltr. N, Sec. 13, T30N, R11W**

Dear Mr. Foust:

Your letter dated March 5, 1997 incorrectly cited the name of the facility as Hampton #1. Subsequent phone conversations with you indicated that the facility name on the document should have been Hampton 4M. In response to that letter (March 5, 1997), Burlington Resources Oil and Gas Co. (Burlington) is submitting this Plan of Action for the Hampton 4M Production Location.

PNM Gas Services (PNM) previously found dissolved phase hydrocarbons in their groundwater monitoring well MW-4. This well is down gradient of Burlington's operations and may indicate contamination from the activities associated with the production tanks. No groundwater contaminants were found in PNM's MW-3, which is down gradient of Burlington's separators and separator discharge pit. Please refer to the Hampton 4M Site Map and Groundwater Contour Map (Enclosures 1 and 2 respectfully).

Burlington will excavate contaminated soil from the earthen pit associated with the production tanks (tank pit) on the Southeast corner of the location. Production tanks and associated lines will be removed to aid in the excavation. Excavation of the tank pit will continue until 1) a representative sample of the excavation walls and floor indicate BTEX and TPH levels below OCD remediation levels *Unlined Surface Impoundment Closure Guidelines* (NMOCD 1993); or 2) the maximum practical extent of the excavation equipment is reached; or 3) when groundwater is encountered.

If groundwater is encountered, Burlington will assume the vertical extent of contamination has been reached. Subsequent excavation efforts will focus on the horizontal extent of contaminated soil. A groundwater monitoring well will be placed in the center of the excavation. The well will be developed and a groundwater sample will be analyzed for BTEX and TPH compounds. The NMOC will be notified of the results.

Contaminated soils will be remediated on the surface of the location or off site on locations within the same lease. Once the soil has reached the OCD remediation levels for BTEX and TPH, it will be left on the surface of the location. The excavation will be back-filled using material from an off site location. Burlington may elect to leave the excavation open to be backfilled with the excavated soil once it has been remediated. In such a case the open excavation will be fenced.

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The separator discharge pit will be assessed for contamination prior to excavation. If the assessment shows that contaminants are above OCD remediation levels then the pit will be excavated in the same manner as the tank pit. If contaminants are below OCD remediation levels, it will be concluded that the pit is clean and it did not impact groundwater at the site.

Burlington is planning to initiate remediation activities the week of 4/28/97. Events beyond Burlington's control (e.g. weather, or extent of contamination) may change the plan of action or delay the start date. Burlington will notify the NMOCD in such a case.

Please contact me at (505) 326-9537 if you need any further information regarding this issue.

Sincerely,


Craig A. Bock
Environmental Representative

Enclosures: Enclosure 1 - Hampton 4M Site Map
 Enclosure 2 - Hampton 4M Groundwater Contour Map

cc: K. Baker - BR
 J. Ellis - BR
 Bill Olson - NMOCD Santa Fe

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HAMPTON 4M SITE MAP

