NM -

GENERAL CORRESPONDENCE

YEAR(S): 2004-1992

bp



BP America Production Company 200 Energy Court Farmington, NM 87401

Phone: (505) 326-9200

October 10, 2004

Mr. Edwin A. Martin NMOCD Environmental Bureau 1220 South St. Francis Drive Santa Fe, NM 87505

Subject: Hart Canyon Centralized Soils Remediation Facility

NM-0050

Dear Mr. Martin:

This letter is in reference to your request on the status of the Hart Canyon Centralized Soils Remediation Facility that was permitted on March 8, 1993. This facility was never constructed or used. I have talked with Buddy Shaw, who was the Field Environmental Coordinator at the time, and he informed me that they were going to use this site, but never did. Therefore, this will serve as notice that the permit for this facility is no longer valid, and there will be no closure report due to no activity ever taking place. Thank you for bringing this to my attention, and if you have any further questions, please feel free to contact me.

Sincerely,

Donald Brooks

Environmental Coordinator

505-326-9425

505-330-4937 (Cell Phone)

brooksd2@bp.com (e-mail)



NEW EXICO ENERGY, MENERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

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

September 16, 2004

Mr. B.D. Shaw
Environmental Coordinator
Amoco Production Company
200 Amoco Court
Farmington, NM 87401

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (NMOCD) permitted the Hart Canyon Centralized Soils Remediation Facility on March 8, 1993. If this facility is no longer active, the NMOCD has not received notification of that fact. Nor has the NMOCD received a closure report on the facility.

If the facility is still active, your permit required renewal of your permit on March 8, 1998 and again on March 8, 2003.

Inform the NMOCD of the status of this facility. If closed, submit a closure report including a description of cleanup procedures undertaken by you at the site.

If you have any questions, contact Ed Martin at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin

Environmental Bureau

Il Martin

Cc: Denny Foust, NMOCD, Aztec





ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

March 8, 1993

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-667-241-940

Mr. B.D. Shaw, Environmental Coordinator Amoco Production Company 200 Amoco Court Farmington, New Mexico 87401

RE:

Hart Canyon Centralized Soils Remediation Facility

OCD Rule 711 Permit Approval San Juan County, New Mexico

Dear Mr. Shaw:

The permit application for the Amoco Production Company Hart Canyon centralized soils remediation facility located in the N/2 NW/4, Section 29, Township 31 North, Range 9 West, San Juan County, New Mexico, is hereby approved in accordance with the Oil Conservation Division (OCD) Rule 711 under the conditions contained in the enclosed attachment. The permit consists of the application dated October 15, 1992.

The operation, monitoring and reporting shall be as specified in the enclosed attachment. All modifications and alternatives to the approved soils remediation methods must receive prior OCD approval. You are required to notify the Director of any facility expansion or process modification and to file the appropriate materials with the Division.

Please be advised that approval of this permit does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

Please be advised that all tanks exceeding 16 feet in diameter and exposed pits, ponds, or lagoons must be screened, netted or otherwise rendered nonhazardous to migratory birds.

Mr. B.D. Shaw. March 8, 1993 Page 2

This permit approval is for a period of five (5) years. This approval will expire on March 8, 1998 and you should submit an application for renewal in ample time before that date. The Division shall have the authority to administratively change this permit to protect fresh water, human health and the environment.

If you have any questions, please do not hesitate to contact Kathy Brown at (505) 827-5884.

Sincerely:

William J. LeMay

Director

WJL/kmb

Attachment

xc: Denny Foust- OCD Aztec Office

ATTACHMENT TO OCD 711 PERMIT APPROVAL AMOCO PRODUCTION COMPANY CENTRALIZED SOILS REMEDIATION FACILITY

(March 8, 1993)

COMPOSTING OPERATION

- 1. Disposal at the facility will only occur when an attendant is on duty. The facility will be secure when no attendant is present.
- 2. The facility will be fenced and have a sign at the entrance. The sign will be legible from at least fifty (50) feet and contain the following information: a) name of the facility, b) location by section, township and range, and c) emergency phone number.
- 3. An adequate berm will be constructed and maintained to prevent runoff and runon for that portion of the facility containing contaminated soils.
- 4. Only contaminated soils from Amoco operations will be accepted at the facility.
- 5. Only solids which are exempt from the RCRA Subtitle C regulations or are non-hazardous by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Comprehensive records of all laboratory analyses and sample locations will be maintained by the operator.
- 6. Moisture will be added as necessary to enhance bioremediation and to control blowing dust. There will be no ponding, pooling or run-off of water.
- 7. Enhanced bioremediation through the application of microbes (bugs) will only be permitted after prior approval from the OCD. Request for application of microbes must include the location of the area designated for the bio-remediation program, composition of additives, and the method, amount and frequency of application.
- 8. No free liquids or soils with free liquids will be accepted at the facility.
- 9. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) date received, 3) quantity, 4) exempt or non-exempt status and analysis for hazardous constituents if required, 5) transporter, and 6) exact cell location and any addition of microbes, moisture, fertilizer, etc.

TREATMENT ZONE MONITORING

- 1. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface. The sample will be analyzed for total petroleum hydrocarbons (TPH), general chemistry, and heavy metals using approved EPA methods.
- 2. A treatment zone not to exceed three (3) feet beneath the original land surface will be monitored. A minimum of one random soil sample will be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two to three (2-3) feet below the native ground surface.
- 3. The soil samples will be analyzed using approved EPA methods for TPH and BTEX quarterly, and for general chemistry and heavy metals annually.
- 4. After obtaining the soil samples the boreholes will be filled with an impermeable material such as cement.

REPORTING

- 1. Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe Office within thirty (30) days of receipt from the laboratory.
- 2. The OCD will be notified of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

CLOSURE

- 1. The operator will notify the Division of cessation of operations. Upon cessation of disposal operations for six (6) consecutive months, the operator will complete cleanup of constructed facilities and restoration of the facility site within the following six (6) months, unless an extension for time is granted by the Director. A closure plan for the facility will be approved by the OCD prior to any closure operations.
- 2. When the facility is to be closed no new material will be accepted. Existing soils will be remediated until they meet the OCD standards in effect at the time of closure. The area will then be reseeded with natural grasses and allowed to return to its natural state. Closure will be pursuant to all OCD requirements in effect at the time of closure.

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OIL CONSERVATION DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

	Personal	Time 10:30 A	, <u>~</u>	Date 2/12/93	
Originating Party			Other Parties		
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STATE OF NEW MEXICO

OIL CONSERVATION DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

Originating Party Other Parties Kathy Brown - OCD Buddy Shaw- Amox of 326-9219 Joiett 2 Proposed Centralized Soil Composting Sites - Additional Information.		Time		Date			
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smaller. No land-farming, only composting. Mix pules with	·			,			
oily soil, water, manue, hery wood chips etc. and let sit and	sily soil, water manue	hermondo	hips	etr and let sit and			
do there thing. Believe that the hydrocarbons are killed							
within 3-6 weeks, but it takes a little longer to get the							
TPH down to standards since other ingredients added.							
Want to start the new facilities in March. Would use				,			
the remediated soils for backfill into pits as remove the							
oil soils so would not be back filling the pits with soils							
removed from those pit. But has a problem	ionalusions or Agreements vernoved	2 from Ih	ose Dif	5. Blm has a problem			
with this - they actually have a problem with bringing			,	•			
any remediated soils back to their sites.							
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OIL CONSERVATION DIV P. 02

OIL SERVICIN DIVISION Revised 5/92

State of New Mexico

Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088

Santa Fe, NM 87501

	APPLICATION FOR SURFACE WASTE DISPOSAL PACILITY (Reper to OCD Quidelines for assistance in completing the application)
	Commercial Centralized
I.	Type: Produced Water Drilling Muds Other Other Solids
П.	OPERATOR: Amoco Production Company
	ADDRESS: 200 Amoro Court FARMINGTON, NM 8 170
	CONTACT PERSON: Bunday Shaw PHONE: 326-9219
III.	LOCATION: N/2 14 NW 14 Section 29 Township 31N Range 9W Submit large scale topographic map showing exact location.
IV.	IS THIS AN EXPANSION OF AN EXISTING FACILITY? Yes No
(v.	Attach the name and address of the landowner of the disposal facility site and landowners of record within one-half mile of the site.
VI.	Attach discription of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
VII.	Attach detailed engineering designs with diagrams prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, acrations systems, enhanced evaporation (spray) systems, waste treating systems, and security systems.
VIII.	Attach a contingency plan for reporting and clean-up of spills or releases.
IX.	Attach a routine inspection and maintenance plan to ensure permit compliance.
X.	Attach a closure plan.
XI.	Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quantity of ground water must be included.
XII.	Attach proof that the notice requirements of OCD Rule 711 have been met (Commercial facilities only).
XIII.	Attach a contingency plan in the event of a release of H ₂ S.
XIV.	Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
XV.	CERTIFICATION
	I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	Name: Buddy Shaw Title: Environmental Coordinator Signature: Date: 10-15-92
	Signature:
	DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

Plan for Disposal

Compost mixture consists of the following:

- 1. Oil soil from Amoco pits
- 2. Manure from NAPI and San Juan Downs
- 3. Paper products diverted from Regional Landfill

TPH and BTEX composite tests will be conducted on the final compost sites prior to use as backfill material for ongoing pit cleanups across the San Juan Basin. The site will be fenced for security purposes (6' chain-linked with barbed wire).

Contingency Plan

The site will be bermed and fenced. Should a leak or spill occur it will be contained on site. Any such occurrence will be reported to the OCD office in Aztec immediately. Cleanup will consist of re-entry into the compost pile. Cleanup equipment will be onsite.

Inspection and Maintenance Plan

Site equipment and berm will be inspected daily. Any needed repairs will be made immediately.

Closure Plan

Additional testing will be conducted at the end of the project to make sure no contamination has occurred to the landowner's property. Test results will be furnished as they are received.

Landowner

Cedelia Ulibarri c/o Gerald Ulibarri 656 CR 4599 Blanco, NM 87412

This site has no other landowners within one-half mile.

No groundwater depths available in this area.

State of New Mexico

Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION

P.O. Box 2088 Santa Fe, NM 87501

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