

1R - 187

APPROVALS

YEAR(S):

Price, Wayne

From: Price, Wayne
Sent: Friday, May 10, 2002 4:30 PM
To: 'whearth@iamerica.net'; Price, Wayne
Cc: Kent Weissling
Subject: RE: Request for Final Closure - UMC Carlisle # 1

The OCD hereby approves of the closure plan for the UMC-Carlisle #1. Please provide the final monitor well plugging report by June 30, 2002.

Please be advised that NMOCD approval of this plan does not relieve Ocean Energy of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Ocean Energy of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----

From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Wednesday, May 01, 2002 11:11 AM
To: Price, Wayne
Cc: Kent Weissling
Subject: RE: Request for Final Closure - UMC Carlisle # 1

Wayne:

The contact is: kent.weissling@oceanenergy.com.

Thanks for getting on it so quickly!

Mike

-----Original Message-----

From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Wednesday, May 01, 2002 11:46 AM
To: 'whearth@iamerica.net'
Subject: RE: Request for Final Closure - UMC Carlisle # 1

Mike I need a E-mail contact for Ocean Energy.

-----Original Message-----

From: Mike Griffin [mailto:whearth@iamerica.net]
Sent: Monday, April 01, 2002 10:46 AM
To: Wayne Price
Cc: Kent Weissling
Subject: Request for Final Closure - UMC Carlisle # 1

Wayne,

It was good talking to you this morning.

In accordance with your guidance, we are asking for final closure of the above project. Upon your acceptance, we intend to pull the casing and grout all three monitor wells to surface. A copy of the Well Plugging Report will be forwarded to you immediately upon completion.

I've also taken the liberty of preparing spread sheets showing the BTEX concentrations within the well bores for the past six quarters. I believe

that the high Benzene reading for the 9/19/00 west well report is almost certainly due to cross-contamination of our pumping equipment. We reverted to dedicated, manual bailers beginning April, 2001 and got clean results thereafter.

Copies of the September 2000 and January 2001 test results are being sent to you under separate cover.

Also attached is a correction to the Executive Summary of the Closure Report dated March 26, 2002. Thank you for catching the error.

Mike Griffin



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

September 6, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5051 5031

Mr. Kent Weissling
Ocean Energy Inc.
1001 Fannin Suite 1600
Houston, Texas 77002

Re: Ocean Energy Carlisle Remediation Project

Dear Mr. Weissling:

The New Mexico Oil Conservation Division (OCD) is in receipt of Whole Earth Environmental, Inc.'s letter and remediation plan dated August 21, 2000 submitted on behalf of Ocean Energy. **The Plan is hereby approved.**

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

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD Hobbs Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT I Hobbs
PO BOX 1980
Hobbs, NM 88241-1981
(505) 393-6161

Jennifer A. Salisbury
CABINET SECRETARY

April 18, 1998

Mr. Scott M. Webb
Regulatory Coordinator
UMC Petroleum Corporation
17th Street 410 Bldg. Suite 1400
Denver, Colorado 80202

Re: Site Assessment Work Plan for the UMC Petroleum Corporation well: Carlisle State Com
#1. Located in UL K Sec 10-Ts16s-R35e. Submitted by Callaway Safety Equipment
Co., Inc. (CSE).

Dear Mr. Webb:

New Mexico Oil Conservation Division (NMOCD) is in receipt of the above referenced plan dated April 15, 1998 for the UMC Petroleum Corporation (UMC) submitted by CSE. **Please note this plan is hereby approved as submitted subject to the following additional conditions:**

1. All pits including drilling pits, shall be closed pursuant to the "OCD APPROVAL CONDITIONS FOR RCRA EXEMPT UNLINED CLOSURES" (Attached hereto). Final closure samples shall be EPA methods from a third party lab.

All pits shall be remediated and closed within 90 days of receipt of this letter. NMOCD can allow additional time for good cause shown.

2. All areas impacted by the unauthorized release of fluids from the well and/or any associated activity shall be closed pursuant to the "OCD APPROVAL CONDITIONS FOR REMEDIATION OF LEAKS AND SPILLS" (Attached hereto).

All remediation areas shall be closed within one year from receipt of this letter. NMOCD can allow additional time for good cause shown.

The **over spray areas of contamination** as defined in your 1.7.1.1 do not need to be screened for chlorides but will require BTEX and TPH analysis per EPA methods from a third party lab for final closure samples. If UMC chooses to utilize natural attenuation in this area then NMOCD will require a monitoring progress plan to ensure its success.

The NMOCD will require that these areas are not utilized for grazing of livestock as long as levels of contaminants remain that could harm wildlife or domestic stock. If levels are sufficiently high to cause harm then UMC shall fence-off this area or provide an active plan to reduce the levels in a timely fashion.

NMOCD recommends that UMC contact the New Mexico Department of Game & Fish to determine if this large area warrants any special attention concerning any threatened or endangered local species. It will be UMC's responsibility to abide by any laws pertaining to these type of issues.

3. UMC will be granted permission to dispose of any waste i.e. contaminated soils, waters, drilling muds, etc. off-site if disposed of at an approved NMOCD facility. Records must be kept. UMC must classify all waste as to exempt or non-exempt status as defined in EPA RCRA CFR 40 part 260-299 before being offered for disposal.
4. All landfarm areas shall have at least one sample taken three feet below the center of the treatment zone area for background purposes. These analysis shall include BTEX (8020), TPH (418.1) and EPA general chemistry. At the end of the project this sample shall be taken again to determine if contaminants have migrated into the vadose zone.
5. UMC must supply to NMOCD records of all product sells, and waste disposed of as of to-date. This does not include the gas sells, but shall include all hydrocarbon liquid products which requires a C-117 per event i.e. condensate, oil, etc., all liquid and solid waste. **Please provide this within 30 days of receipt of this letter.**
6. **All Pits must be lined or re-lined before use.**
7. The NMOCD will require a 48 hour notification to witness and/or split the bottom hole samples of all pits. Failure to comply will require the pit to be re-opened.

Please be advised that NMOCD approval of this plan does not relieve UMC of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD District I approval does not relieve UMC of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,



Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor
Roger Anderson-Environmental Bureau Chief, Santa Fe, NM
Mr. Pat McCasland-Callaway Safety Equipment Co.,Inc.

W Price 4/18/98

OCD APPROVAL CONDITIONS
FOR
REMEDIATION OF LEAKS AND SPILLS

1. The following remedial actions will be performed in accordance with OCD's August 13, 1993 "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES":
 - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
 - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - c. Final soil contaminant concentrations will be determined upon completion of remedial actions.
 - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons, ~~AND CHLORIDES.~~
2. All wastes removed from a specific site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to remedial actions.
4. Upon completion of all remedial actions, a final remedial action report containing a description and the results of all remedial actions will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final remedial action report be submitted only upon completion of all remedial activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Hobbs Office for approval with copies provided to the OCD Santa Fe Office.
6. OCD approval does not relieve you of liability should remedial activities determine that contamination exists which is beyond the scope of the work plan or if the actions fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

J. Price 9/18/98

OCD APPROVAL CONDITIONS
FOR
RCRA EXEMPT
UNLINED PIT CLOSURES

1. The following closure actions will be performed in accordance with OCD's February 1993 "SURFACE IMPOUNDMENT CLOSURE GUIDELINES":
 - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
 - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - c. Final soil contaminant concentrations will be determined upon completion of remedial actions.
 - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons, *AND CHLORIDES.*
2. All wastes removed from a specific site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to a pit closure.
4. Upon completion of all closure activities, a completed OCD "Pit Remediation and Closure Report" form containing the results of all pit closure and soil remediation activities will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final pit closure reports be submitted only upon completion of all closure activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Hobbs Office for approval with copies provided to the OCD Santa Fe Office.
6. OCD approval does not relieve you of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if the closure activities fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

DISTRICT :
P.O. Box 1940 Hobbs, NM
DISTRICT :
Tobacco OD, Artesia, NM 88211
DISTRICT :
100 Rio Grande Rd., Artesia, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

SUBMIT : COPY TO
APPROPRIATE
DISTRICT OFFICE
AND 1 COPY TO
SANTA FE OFFICE

**OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NM 87505**

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

Operator: _____ Telephone: _____

Address: _____

Facility Or: _____
Well Name _____

Location: Unit or Qtr/Qtr Sec _____ Sec _____ T _____ R _____ County _____

Pit Type: Separator _____ Dehydrator _____ Other _____

Land Type: BLM _____, State _____, Fee _____, Other _____

Pit Location: Pit dimensions: length _____, width _____, depth _____
(attach diagram)

Reference: wellhead _____, other _____

Footage from reference: _____

Direction from reference: _____ Degrees _____ East North _____
of
_____ West South _____

Depth To Ground Water: _____
(Vertical distance from
contaminants to seasonal
high water elevation of
ground water)

Less than 50 feet	(20 points)
50 feet to 99 feet	(10 points)
Greater than 100 feet	(0 Points)

Wellhead Protection Area: _____
(Less than 200 feet from a private
domestic water source, or; less than
1000 feet from all other water sources)

Yes	(20 points)
No	(0 points)

Distance To Surface Water: _____
(Horizontal distance to perennial
lakes, ponds, rivers, streams, creeks,
irrigation canals and ditches)

Less than 200 feet	(20 points)
200 feet to 1000 feet	(10 points)
Greater than 1000 feet	(0 points)

RANKING SCORE (TOTAL POINTS): _____

Date Remediation Started: _____ Date Completed: _____

Remediation Method: Excavation _____ Approx. cubic yards _____
(Check all appropriate sections) Landfarmed _____ Insitu Bioremediation _____
Other _____

Remediation Location: Onsite _____ Offsite _____
(ie. landfarmed onsite,
name and location of
offsite facility)

General Description Of Remedial Action: _____

Ground Water Encountered: No _____ Yes _____ Depth _____

Final Pit: Sample location _____
Closure Sampling: _____
(if multiple samples,
attach sample results
and diagram of sample
locations and depths) Sample depth _____
Sample date _____ Sample time _____
Sample Results
Benzene(ppm) _____
Total BTEX(ppm) _____
Field headspace(ppm) _____
TPH _____

Ground Water Sample: Yes _____ No _____ (If yes, attach sample results)

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST
OF MY KNOWLEDGE AND BELIEF

DATE

SIGNATURE

PRINTED NAME
AND TITLE