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**//**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

**1999-1998**



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

January 7, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-585**

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

**RE: GROUND WATER CONTAMINATION  
FLORANCE 44 AND FLORANCE 47X WELL SITES**

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has reviewed Amoco Production Company's (Amoco) August 4, 1998 correspondence titled "AMOCO PRODUCTION COMPANY FLORANCE Y 44 AND FLORANCE M 47X EARTHEN PITS" which was submitted on behalf of Amoco by their consultant Blagg Engineering, Inc. This documents contain the results of Amoco's pit closure activities at the Florance Y 44 and Florance M 47X well sites and requests closure of remedial actions.

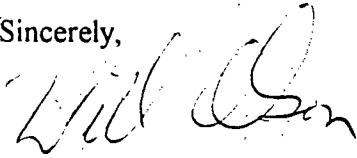
A review of recent PNM reports on these sites shows that ground water contamination upgradient of PNM's former dehydration pits appears to be a result of production disposal activities related to Amoco's operations. Due to the presence of ground water contamination downgradient of Amoco's operations at these sites, the above closure request is denied. The OCD requires that Amoco investigate and remediate soil and ground water contamination at and downgradient of Amoco's operations at these sites pursuant to Amoco's previously approved pit closure and ground water remediation plans.

The OCD requests that Amoco work together with PNM for overall remediation of site ground water and soils. Please refer to PNM reports on file at the OCD Aztec District Office for information on PNM's site investigations.

Mr. B. D. Shaw  
January 7, 1999  
Page 2

If you have any questions, please call me at (505) 827-7154.

Sincerely,

A handwritten signature in cursive script, appearing to read "Will Olson".

William C. Olson  
Hydrologist  
Environmental Bureau

xc:   OCD Aztec District Office  
      Bill Liess, BLM Farmington District Office  
      Jeffery C. Blagg, Blagg Engineering, Inc.  
      Maureen Gannon, PNM

**BLAGG ENGINEERING, INC.**

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

August 4, 1998

AUG - 7 1998

Mr. William C. Olson  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

Re: Amoco Production Company  
Florance Y 44 and Florance M 47 X Earthen Pits

Dear Mr. Olson:

On behalf of Amoco Production Company, Blagg Engineering, Inc. (BEI) is responding to your correspondence dated July 15, 1998 with respect to the Florance Y 44, H Sec 31-T30N-R8W and the Florance M 47X, G Sec. 5-T30N-R9W. Public Service Company of New Mexico (PNM) has discovered subsurface contamination resulting from discharges to earthen dehydrator pits previously operated by PNM at these locations. At both sites Amoco Production Company has formerly conducted earthen pit reclamation activities on pits operated by Amoco. Attached, please find pit closure documentation for each site.

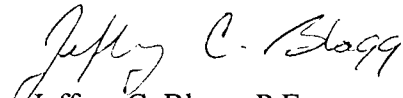
Based on review of the pit closure work conducted by Amoco at the Florance Y 44, a blow pit was remediated by excavation and landfarming in August, 1996. Closure of the pit is recommended due to sample results meeting closure standards. A separator pit remediated by excavation and landfarming in August, 1996 is recommended for closure due to a bedrock base and appropriate risk assessment procedures. No additional discharges to the environment have been conducted by Amoco at this site since the date of remediation. Therefore, it is the opinion of BEI that site contamination subsequently discovered by PNM is not the result of activities conducted by Amoco Production Company.

Amoco remediated a production tank pit at the Florance M 47X location in August, 1997. This pit meets closure standards appropriate to the area and closure of the pit by NMOCD is requested. However, Amoco may have conducted other prior (approved) discharges to the environment that have not been fully investigated. The effects of these other possible discharges will be investigated and a report will be made to your attention.

Please note that PNM has informed Amoco that PNM intends to pursue aggressive cost recovery procedures for remediation efforts that they conduct on pits owned and operated by PNM located on Amoco well sites. This cost recovery intention may interfere with your recommendation that Amoco work with PNM in remedial efforts at joint contamination sites.

Questions or comments concerning the this transmittal may be directed to Jeff Blagg of Blagg Engineering at (505)632-1199 or to Buddy Shaw with Amoco at (505)326-9200. We look forward to your review of our request for closure of the earthen pits at the subject well sites.

Respectfully submitted:  
***Blagg Engineering, Inc.***

  
Jeffrey C. Blagg, P.E.  
President

Attachments: Pit Closure Reports

cc: Denny Foust, NMOCD Aztec District Office  
B.D. Shaw, Amoco San Juan Operations Center

Amoco/44y47x.xmt

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

80501

FORM APPROVED  
Budget Bureau No. 1004-0135  
Expires: March 31, 1993

**SUNDRY NOTICES AND REPORTS ON WELLS**

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.  
Use "APPLICATION FOR PERMIT—" for such proposals

**SUBMIT IN TRIPLICATE**

1. Type of Well

☐ Oil Well ☒ Gas Well ☐ Other

2. Name of Operator

Amoco Production Company

3. Address and Telephone No.

200 Amoco Court, Farmington, N.M. 87401 Tel: (505) 326-9200

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)

SW/4 NE/4, SEC. 5, T 30 N, R 9 W, N.M.P.M.

5. Lease Designation and Serial No.

SF-078316

6. If Indian, Allottee or Tribe Name

7. If Unit or CA, Agreement Designation

8. Well Name and No.

FLORANCE M #47X

9. API Well No.

3004511914

10. Field and Pool, or Exploratory Area

MESA VERDE / ACTURED CLIFF

11. County or Parish, State

SAN JUAN, NM

12. CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION

- ☐ Notice of Intent  
☒ Subsequent Report  
☐ Final Abandonment Notice

TYPE OF ACTION

- ☐ Abandonment  
☐ Recompletion  
☐ Plugging Back  
☐ Casing Repair  
☐ Altering Casing  
☒ Other Pit closure  
☐ Change of Plans  
☐ New Construction  
☐ Non-Routine Fracturing  
☐ Water Shut-Off  
☐ Conversion to Injection  
☐ Dispose Water

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)\*

Pit closure verification - see attached documentation.

① PRODUCTION TANK PIT - ABANDONED, CLOSED.

14. I hereby certify that the foregoing is true and correct

Signed

B. Shaw

Title

Enviro. Coordinator

Date

8/5/97

(This space for Federal or State office use)

Approved by

Title

Date

Conditions of approval, if any:

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statement or representations as to any matter within its jurisdiction.

\*See Instruction on Reverse Side

**District I**

P.O. Box 1980, Hobbs, NM

**District II**

P.O. Drawer DD, Artesia, NM 88211

**District III**

1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico  
Energy, Minerals and Natural Resources Department**OIL CONSERVATION DIVISION**P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

80501

SUBMIT 1 COPY TO  
APPROPRIATE  
DISTRICT OFFICE  
AND 1 COPY TO  
SANTA FE OFFICE**PIT REMEDIATION AND CLOSURE REPORT**Operator: Amoco Production Company Telephone: (505) - 326-9200Address: 200 Amoco Court, Farmington, New Mexico 87401Facility Or: FLORANCE M # 47X  
Well NameLocation: Unit or Qtr/Qtr Sec 6 Sec 5 T30N R9W County SAN JUANPit Type: Separator    Dehydrator    Other PRODUCTION TANKLand Type: BLM X, State   , Fee   , Other   Pit Location: Pit dimensions: length 17', width 17', depth 9'  
(Attach diagram)Reference: wellhead X, other   Footage from reference: 70'Direction from reference: 53 Degrees X East North X  
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) 10**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) 0**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) 0

RANKING SCORE (TOTAL POINTS):

10

Date Remediation Started: \_\_\_\_\_ Date Completed: 8/5/97

Remediation Method: Excavation ☒ Approx. cubic yards 70  
(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: \_\_\_\_\_

Excavation

Ground Water Encountered: No ☒ Yes \_\_\_\_\_ Depth \_\_\_\_\_Final Pit: Sample location see Attached Documents

Closure Sampling:  
(if multiple samples, attach sample results and diagram of sample locations and depths)

Sample depth 11'Sample date 8/4/97 Sample time 1145

## Sample Results

Benzene (ppm) \_\_\_\_\_

Total BTEX (ppm) \_\_\_\_\_

Field headspace (ppm) 2.3TPH 60 ppmGround 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 8/5/97  
SIGNATURE B. Shaw PRINTED NAME AND TITLE Buddy D. Shaw  
Environmental Coordinator



CLIENT: <u>AMOCO</u>	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	LOCATION NO: <u>80501</u> C.O.C. NO: <u>5105</u>
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FIELD REPORT: CLOSURE VERIFICATION	PAGE No: <u>1</u> of <u>1</u>
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LOCATION: NAME: <u>FLORANCE M</u> WELL #: <u>47X</u> PIT: <u>PROD.</u>	DATE STARTED: <u>8/4/97</u>
QUAD/UNIT: <u>G</u> SEC: <u>5</u> TWP: <u>30N</u> RNG: <u>9W</u> PM: <u>Nm</u> CNTY: <u>ST</u> ST: <u>NM</u>	DATE FINISHED: _____
QTR/FOOTAGE: <u>SW/4</u> <u>NE/4</u> CONTRACTOR: <u>P+S</u>	ENVIRONMENTAL SPECIALIST: <u>NV</u>

EXCAVATION APPROX. <u>17</u> FT. x <u>17</u> FT. x <u>9</u> FT. DEEP. CUBIC YARDAGE: <u>70</u>
DISPOSAL FACILITY: <u>ON-SITE</u> REMEDIATION METHOD: <u>LANDFARMED</u>
LAND USE: <u>RANGE</u> LEASE: <u>5F-078316</u> FORMATION: <u>MV/PC</u>

FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY <u>70</u> FT. <u>N53E</u> FROM WELLHEAD.
DEPTH TO GROUNDWATER: <u>&lt;100'</u> NEAREST WATER SOURCE: <u>&gt;1000'</u> NEAREST SURFACE WATER: <u>&gt;1000'</u>
NMDCD RANKING SCORE: <u>10</u> NMDCD TPH CLOSURE STD: <u>1000</u> PPM
SOIL AND EXCAVATION DESCRIPTION:

CHECK ONE:  
☐ PIT ABANDONED  
☒ STEEL TANK INSTALLED  
☐ FIBERGLASS TANK INSTALLED

DR. YELL. BROWN SAND, NON COHESIVE, SLIGHTLY MOIST, FIRM, NO APPARENT STAINING OR HC ODOR, OBSERVED W/IN EXCAVATION, NO APPARENT HC ODOR IN ANY OF THE OVM SAMPLES.

**CLOSED**

FIELD 418.1 CALCULATIONS

TIME	SAMPLE I.D.	LAB No:	WEIGHT (g)	mL. FREON	DILUTION	READING	CALC. ppm
1145	⑤ @ 11'	TPH-A114	5	20	1:1	15	60

SCALE

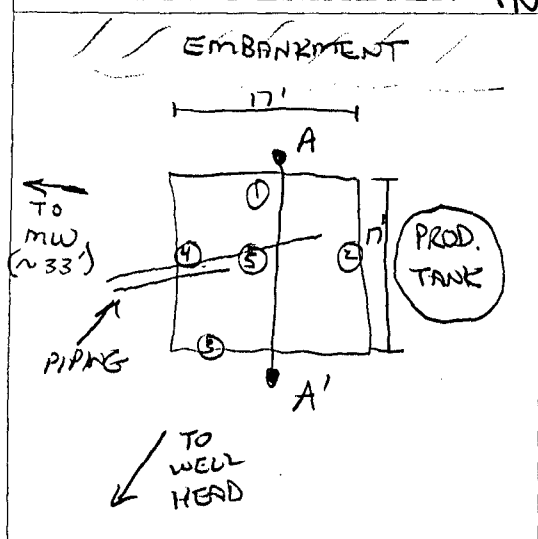


0 FT

PIT PERIMETER

OVM RESULTS

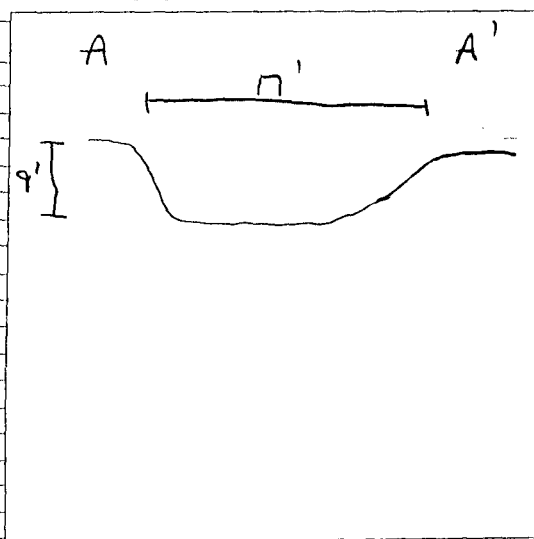
PIT PROFILE



SAMPLE ID	FIELD HEADSPACE PID (ppm)
1 @ 5'	0.0
2 @ 5'	0.0
3 @ 6'	0.0
4 @ 6'	0.0
5 @ 11'	2.3

LAB SAMPLES		
SAMPLE ID	ANALYSIS	TIME
⑤ @ 11'	TPH (418.1)	1145



TRAVEL NOTES: CALLOUT: 8/4/97-MORN. ONSITE: 8/4/97-MORN.

**BLAGG ENGINEERING, INC.**

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

**FIELD MODIFIED EPA METHOD 418.1  
TOTAL PETROLEUM HYDROCARBONS**

Client: AMOCO  
Sample ID: 5 @ 11'  
Project Location: Florance M # 47 X  
Laboratory Number: TPH-1914

Project #:   
Date Analyzed: 08-04-97  
Date Reported: 08-04-97  
Sample Matrix: Soil

Parameter	Result, mg/kg	Detection Limit, mg/kg
Total Recoverable Petroleum Hydrocarbons	60	20

ND = Not Detectable at stated detection limits.

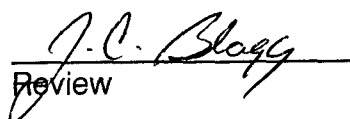
QA/QC:	QA/QC Sample TPH mg/kg	Duplicate TPH mg/kg	% *Diff.
	608	568	6.80

\*Administrative Acceptance limits set at 30%.

Method: Modified Method 418.1, Petroleum Hydrocarbons, Total  
Recoverable, Chemical Analysis of Water and Waste,  
USEPA Storet No.4551, 1978

Comments: Production Tank Pit - B0501

  
Analyst

  
Review

Client:	Blagg / Amoco	Project #:	04034-10
Sample ID:	5 @ 11'	Date Reported:	08-06-97
Laboratory Number:	B764	Date Sampled:	08-04-97
Chain of Custody No:	5105	Date Received:	08-04-97
Sample Matrix:	Soil	Date Extracted:	08-05-97
Preservative:	Cool	Date Analyzed:	08-05-97
Condition:	Cool and Intact	Analysis Needed:	TPH-418.1

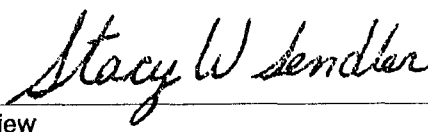
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	5.8	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: Florance #47X Prod. Tank Pit.

  
Analyst

  
Review

**QUALITY ASSURANCE / QUALITY CONTROL  
DOCUMENTATION**

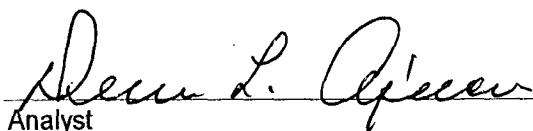
Client:	QA/QC	Project #:	N/A
Sample ID:	Method Blank	Date Reported:	08-06-97
Laboratory Number:	08-05 -TPH.BLANK	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Received:	N/A
Preservative:	N/A	Date Extracted:	08-05-97
Condition:	N/A	Analysis Needed:	TPH

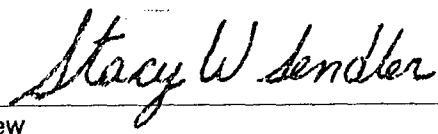
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	ND	5.0

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: QA/QC for sample B764.

  
Analyst

  
Review

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	08-06-97
Laboratory Number:	B764	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Extracted:	08-05-97
Condition:	Cool & Intact	Date Analyzed:	08-05-97
		Analysis Needed:	TPH

Parameter	Concentration (mg/Kg)		Dilution Factor	Det. Limit (mg/Kg)	Percent Difference
	Sample	Duplicate			
Total Petroleum Hydrocarbons	5.8	6.3	1	5.0	8.3%

ND - Parameter not detected at the stated detection limit.

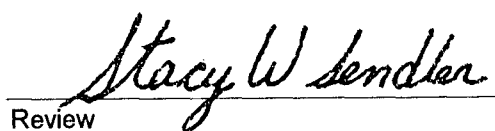
**QA/QC Acceptance Criteria:**

**Administrative control limit set  
at maximum of 30% difference.**

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **QA/QC for sample B764.**

  
Analyst

  
Review

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS  
QA/QC - MATRIX SPIKE

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Spike	Date Reported:	08-06-97
Laboratory Number:	B764	Date Sampled::	N/A
Sample Matrix:	Soil	Date Received:	N/A
Analysis Requested:	TPH	Date Extracted:	08-05-97
		Date Analyzed:	08-05-97

Parameter	Sample Result (mg/kg)	Spike Added (mg/kg)	Spike Sample Result (mg/kg)	Det. Limit (mg/kg)	Percent Recovery
Total Petroleum Hydrocarbons	5.8	2,000	2,023	5.0	101%

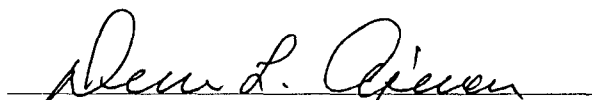
ND = Parameter not detected at the stated detection limit.

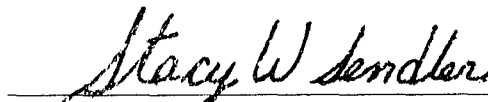
QA ACCEPTANCE CRITERIA:	Parameter	Acceptance Range
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Total Petroleum Hydrocarbons	80 - 120%
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References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: QA/QC for sample B764.

  
Analyst

  
Review







STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

July 15, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-313**

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

**RE: GROUND WATER CONTAMINATION  
FLORANCE 44 AND FLORANCE 47X WELL SITES**

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has recently reviewed Public Service Company of New Mexico's (PNM) April 29, 1998 "FLORANCE 44 SITE, RECONTAMINATION OF CLEAN FILL AND GROUNDWATER CONTAMINATION" and April 29, 1998 "FLORANCE 47X SITE, FREE PRODUCT AND GROUND WATER CONTAMINATION". These documents contain the results of PNM's recent investigation of ground water contamination related to PNM dehydrator pits at Amoco's Florance 44 and Florance 47X well sites.

A review of the above referenced documents shows that ground water contamination upgradient of PNM's former dehydration pits appears to be a result of production disposal activities related to Amoco's former separator pits. Therefore, the OCD requires that Amoco investigate and remediate soil and ground water contamination at and downgradient of Amoco's separator pits at these sites pursuant to Amoco's previously approved ground water remediation plan. Ground water contamination originating from PNM's former dehy pits will be handled by PNM. The OCD requests that Amoco work together with PNM for overall remediation of site ground waters.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: OCD Aztec District Office  
Bill Liess, BLM Farmington District Office  
Nelson Velez, Blagg Engineering, Inc.  
Maureen Gannon, PNM