3R - <u>21</u>

APPROVALS

YEAR(S):

1991

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

August 13, 1991

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

<u>CERTIFIED MAIL -</u> <u>RETURN RECEIPT NO. P-756-666-152</u>

Mr. Buddy Shaw, Environmental Supervisor Amoco Production Company 200 Amoco Court Farmington, New Mexico 87401

RE: Treatment of oily soil located at Gallegos Canyon Unit No. 216, SE/SW Section 14-T28N, R12W

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (NMOCD) has received your letter of August 9, 1991, containing a request for an additional 45 days to complete the previously approved test. The letter also requested approval to mist the soil with fresh water to add moisture as the piles are turned, and to compost some additional material mistakenly brought to the site from another Amoco location.

Based on the information presented in the letter and in our phone conversation of August 7, OCD believes it will be useful to extend the test period, and hereby approves continuation of the test until Monday, September 23, 1991. OCD also approves the test modifications requested above. However, as stated in your letter, no additional material is to be allowed on the site. All other permit provisions previously approved remain in effect.

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

Mr. Buddy Shaw August 13, 1991 -2-

If you have any questions, you may contact me at (505) 827-5812.

Sincerely,

David G. Boyer, Hydrogeologist Environmental Bureau Chief

DGB/sl

cc: OCD Aztec Office E. Rebuck, NMED-Groundwater D. Tomko, NMED-Farmington

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



May 17, 1991

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

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. P-327-278-136</u>

Mr. Buddy Shaw Environmental Supervisor Amoco Production Company 200 Amoco Court Farmington, New Mexico 87401

RE: Treatment of oily soil located at Gallegos Canyon Unit No. 216, SE/SW Section 14-T28N, R12W

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (NMOCD) has received your telephone request of May 10 for permission to change the location of the oily soil composing test from GCU No. 102E, NE/NE Section 13, T29N, R13W to the above alternate location. I understand from your request that lease site is on NAPI-controlled land. Therefore, Amoco is responsible for obtaining their approval in addition to OCD authorization.

In addition, OCD requested in our April 12, 1991, approval letter that Amoco furnish sampling and analysis test procedures within 14-days of receipt of the April 12 letter. To date that information has not been provided.

Therefore, the request to change test location is approved provided the following condition is met:

1. Prior to start of the test, Amoco will submit for OCD review and approval the proposed procedures to be used at the conclusion of the test for the sampling and analysis of remediated materials.

All other conditions of approval given in the April 12 letter remain unchanged. This temporary approval will end 45-days from start of the test. Prior to removal from the site of the remediated mixture, sample results must be reviewed and approved by OCD.

Mr. Buddy Shaw May 17, 1991 Page -2-

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

If you have any questions, you may contact me at (505) 827-5812.

Sincerely,

David G. Boyer, Hydrogeologist

Environmental Bureau Chief

DGB/sl

cc: OCD Aztec Office E. Rebuck, NMED-Groundwater D. Tomko, NMED-Farmington ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

April 12, 1991

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

CERTIFIED MAIL RETURN RECEIPT NO. P327-278-111

Mr. Buddy Shaw Environmental Supervisor Amoco Production Company 200 Amoco Court Farmington, New Mexico 87401

RE: Treatment of oily soil located at Gallegos Canyon Unit No. 102E, NE/NE Section 13-29N.13W

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (NMOCD) has received your request dated April 9, 1991 for permission to conduct a composting test on oily soils located at the above site. In addition to the soil, horse manure, digested sewage sludge and waste paper will be added and mixed on the lease site. The test is planned to be conducted for a limited time of three to five weeks, ground water is at a depth exceeding 200 feet, and no moisture is planned to be added after initial mixing.

Based on the information provided in your request, Amoco is authorized to conduct the test provided the following conditions are met:

- Under RCRA, sewage sludge is subject to testing to determine if it should be handled as 1. hazardous waste. An analysis of the digested sewage sludge was provided this agency for review and OCD approves mixing the sludge with the other materials.
- 2. A berm is to be constructed around the mixing area to collect any fluids or precipitation runoff from the pile. The berm must be located away from any watercourses.
- 3. Amoco will notify OCD district staff prior to mixing of materials at the start of the test.
- 4. No moisture (other than natural precipitation) is to be added after initial mixing.

Mr. Buddy Shaw April 12, 1991 Page -2-

- 5. Monitoring as directed by OCD's Aztec office will be conducted for temperature and hydrocarbon vapors. Internal temperature of the pile will be measured at least daily.
- 6. Amoco must notify OCD and remove any ponded fluids at the site generated as a result of decomposition of the materials or as a result of precipitation. OCD may require sampling of such fluids prior to authorizing disposal at an OCD-approved facility.
- 7. Within 14-days from receipt of this letter, Amoco will submit for OCD review and approval the proposed procedures to be used at the conclusion of the test for the sampling and analysis of remediated materials.

This temporary approval will end 45-days from start of the test. Prior to removal from the site of the remediated mixture, sample results must be reviewed and approved by OCD.

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

If you have any questions, you may contact me at (505) 827-5812.

Sincerely,

David G. Boyer, Hydrogeologist/ Environmental Bureau Chief

DGB/sl

cc: OCD Aztec Office E. Rebuck, NMED-Groundwater D. Tomko, NMED-Farmington