3R - <u>31</u>

APPROVALS

YEAR(S):

12/10/1996

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

December 10, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-269-269-225

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

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco Production Company's (Amoco) September 19, 1994 "AMOCO PRODUCTION COMPANY PIT CLOSURE VERIFICATIONS" which were submitted on behalf of Amoco by their consultant Blagg Engineering, Inc. This document contains "PIT REMEDIATION AND CLOSURE REPORTS" for 37 unlined pits in the San Juan Basin of Northwestern New Mexico.

The OCD's review of the above referenced document is addressed below:

A. The pit closure/soil remediation activities conducted at the sites listed below are approved.

1.	Bolack B LS #5 (Separator pit)	Unit J,	Sec.	33,	T28N,	ROSW.
2.	Elliott GC A#1 (Blow pit I)	Unit D,				
3.	Federal F#1 (Separator pit)	Unit H,	Sec.	16,	T27N,	R10W.
4.	Hancock GC #1 (Compressor pit)	Unit L,	Sec.	15,	T30N,	R12W.
5.	Hancock GC #1 (Separator pit)	Unit L,	Sec.	15,	T30N,	R12W.
6.	Hargrave A#3 (Blow pit)	Unit B,	Sec.	16,	T27N,	R10W.
7.	Hargrave A#3 (Drip pit)	Unit B,	Sec.	16,	T27N,	R10W.
8.	R.P. Hargrave K#1 (Blow pit)	Unit M,	Sec.	16,	T27N,	R10W.
9.	R.P. Hargrave K#1 (Separator pit)	Unit M,	Sec.	16,	T27N,	R10W.
10.	R.P. Hargrave K#1E (Blow pit)	Unit C,	Sec.	16,	T27N,	R10W.
11.	R.P. Hargrave K#1E (Separator pit)	Unit C,	Sec.	16,	T27N,	R10W.
12.	Jones #5E (Blow pit)	Unit I,	Sec.	35,	T29N,	RO8W.
13.	Jones A LS #1A (Separator pit)	Unit J,	Sec.	10,	T28N,	RO8W.
14.	P.O. Pipkin #3E (Blow pit)	Unit I,				
		Unit C,	Sec.	17,	T27N,	R10W.
16.	P.O. Pipkin #4E (Separator pit)	Unit C,	Sec.	17,	T27N,	R10W.

Please be advised that OCD approval does not relieve Amoco of liability if remaining contaminants are found to pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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B. The pit remedial activities conducted at the sites listed below are satisfactory. However, according to the reports, onsite landfarming and/or composting actions are still continuing at the sites. Subsequently, the OCD cannot issue final closure approval at this time and approval of closure actions at these sites is denied. Please resubmit final closure reports for these sites upon completion of the landfarming and/or composting activities. The final reports will include the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

```
1.
     A.L. Elliott C#1 (Blow pit)
                                         Unit B, Sec. 15, T29N, R09W.
     A.L. Elliott C#1 (Separator pit)
2.
                                         Unit B, Sec. 15, T29N, R09W.
     A.L. Elliott D#9 (Blow pit)
                                         Unit N, Sec. 11, T29N, R09W.
3.
     A.L. Elliott E#1 (Blow pit)
                                         Unit D, Sec. 14, T29N, R09W.
4.
5.
     Elliott GC A#1 (Blow pit)
                                         Unit D, Sec. 14, T29N, R09W.
     R.P. Hargrave F#3 (Blow pit)
6.
                                         Unit E, Sec. 16, T27N, R10W.
                                         Unit L, Sec. 06, T27N, R08W.
7.
     Schwerdtfeger A#3E (Blow pit)
     Schwerdtfeger A#3E (Production pit) Unit L, Sec. 06, T27N, R08W.
8.
     Schwerdtfeger A#3E (Separator pit) Unit L, Sec. 06, T27N, R08W.
9.
     Schwerdtfeger A#3E (Dehy pit)
                                         Unit L, Sec. 06, T27N, R08W.
10.
     Schwerdtfeger A LS #22 (Separator) Unit D, Sec. 06, T27N, R08W.
11.
12.
     Schwerdtfeger A LS #10 (Separator) Unit M, Sec. 31, T28N, R08W.
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C. The final pit remedial contaminant levels at the sites listed below excess of the OCD's recommended remediation Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is denied. The OCD requests that Amoco address the extent of the remaining contamination at these The OCD will reconsider issuing closure approval upon resubmission of pit closure forms which address the remaining extent of contamination at the sites. The resubmitted forms should include the completed form and all pertinent information elated to the extent of contamination, the results of the soil remediation levels achieved, the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

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A.L. Elliott C#4 (Separator pit)
                                         Unit A, Sec. 15, T29N, R09W.
2.
     Jones #5E (Tank pit)
                                         Unit I, Sec. 35, T29N, R08W.
                                         Unit A, Sec. 17, T27N, R10W.
3.
     P.O. Pipkin #3 (Blow pit)
     P.O. Pipkin #3 (Separator pit)
4.
                                         Unit A, Sec. 17, T27N, R10W.
5.
     P.O. Pipkin #3E (Dehy pit)
                                         Unit I, Sec. 17, T27N, R10W.
     P.O. Pipkin #3E (Separator pit)
                                         Unit I, Sec. 17, T27N, R10W.
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- D. Ground water at the sites listed below is contaminated with petroleum related constituents in excess of New Mexico Water Quality Control Commission ground water standards and the extent of ground water contamination at the sites has not been determined. Therefore, approval of these pit closure forms is denied. The OCD requests that Amoco investigate the extent of contamination and, if necessary, remediate contaminated ground water pursuant to Amoco's November 21, 1995 ground water investigation/remediation work plan which was approved by the OCD on November 29, 1995.
 - Jennapah GC A#1 (Separator pit)
 Jennapah GC A#1 (Tank pit)
 Unit H, Sec. 36, T28N, R09W.
 T28N, R09W.
 - 3. Price #3 (Separator pit) Unit A, Sec. 15, T28N, R08W.

To simplify the approval process for both Amoco and OCD, the OCD requests that Amoco submit all future pit closure reports only upon completion of all closure activities including onsite landfarming or composting of contaminated soils. The reports should include the completed form and all pertinent information related to the extent of contamination, the results of the soil remediation levels in the pits and landfarms, all laboratory analyses and associated quality assurance/quality control data and the disposition of all remediated soils.

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.
Charmaine Tso, Navajo Nation EPA

O. Box 1980, Hobbs, NM

istrict II
O. Drawer DD, Arceis, NM 88211

istrict III
OO Rio Brazos Rd, Azice, NM 87410

State of New Hexico nergy Hinerals and Natural Resources

partment

OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, New Mexico 87504-2088

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

Owabove lituts

PIT REMEDIATION AND CLOSURE REPORT

Operator:	Amoco Production Company	Telephone: (505) - 326-9200
Address:	200 Amoco Court, Farmingt	on, New Mexico 87401
Facility Or:		
Well Name		
Location: Unit	or Qtr/Qtr Sec H	Sec 36 728 R County SAN JUAN
Pit Type: Sepa:	ratorDehydrator	Other PRODUCTION TANK
Land Type: BL	M, State, Fee	, othercom. AGMT. NAVATO AUDTED
Pit Location: (Attach diagram)		ch 65', width 47', depth 27'
· .	Footage from reference	
Depth To Ground (Vertical distance contaminants to se high water elevati ground water)	e from Pasonal	Less than 50 feet (20 points) 50 feet to 99 feet (10 points) Greater than 100 feet (0 Points)
		Yes (20 points) No (0 points)
Distance To Sur (Horizontal distan lakes, ponds, rive irrigation canals	ce to perennial rs, streams, creeks,	Less than 200 feet (20 points) 200 feet to 1000 feet (10 points) Greater than 1000 feet (0 points)
		PANETNA ACOPE (MOMAL BOTHMAL. 40

Date Remediation 8	tarted:	Date Completed: 9/7/94
Remediation Method	Excavation 🔀	
(Check all appropriate anctions)	Landfarmed 🔀	Insitu Bioremediation
+ 1	Other	
Ramediation Location (e. landfarmed onsite, name and location of offsite facility)	n: Onsite <u>×</u> Off	site
	Of Remedial Action	•
-	•	- OPEN GROWN WATER TO AT MOSPHERE.
	C GROWDWATE MON	
(In 3 the	C Good a Donne	
		· · ·
Ground Water Encoun	tered: No	Yes X Depth 27
2		
Final Pit: Closure Sampling:	Sample location	see Attached Documents
if multiple samples, attach sample results		~!
and diagram of sample Locations and depths)	Sample depth 2 Sample date 9-7	- 99 Sample time
		11 Sample Cime
	Sample Results	20 / AAA
	Benzene (ppm)	
	Total BTEX(pp	
	Field headspac	:B(bbm)
	ТРН	•
Ground Water Sample:	Yes X No	(If yes, attach sample results)
I HEREBY CERTIFY THA		BOVE IS TRUE AND COMPLETE TO THE BEST
DATE 9/13/94		
SIGNATURE BASH	PRINTED N	AME Buddy D. Shawlington

	CLIENT: <u>AMOCO</u> BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199 C.D.C. ND:	<u></u>
	FIELD REPORT: CLOSURE VERIFICATION PAGE NO: _1_ of _1	
	LOCATION: NAME: JENNAPAH GC WELL #: AI PIT: PROD. DATE STARTED: 8/23/94 DATE FINISHED:	-
	QUAD/UNIT: H SEC: 36 TWP: 28 - RNG: 90 PM: NM CNTY: 5T STAM OTR/FOOTAGE: SEL4 NELY CONTRACTOR: P. VELISONEZ ENVIRONMENTAL SPECIALIST: NV	
	SOIL REMEDIATION: EXCAVATION APPROX. (5 FT. x 47 FT. x 27 FT. DEEP. DISPOSAL FACILITY: LANDFARMED ON-SITE CUBIC YARDAGE: 3060 LAND USE: RANGE LEASE: 14-20-603-782 ALLOTE	>
	FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY 275 FEET N35E FROM WELLHE DEPTH TO GROUNDWATER: <50 NEAREST WATER SOURCE: 7000 NEAREST SURFACE WATER: <200 1	AD.
	NMOCD RANKING SCORE: 40 NMOCD TPH CLOSURE STD: 100 PPM FORMATION: DK	—
	SOIL AND EXCAVATION DESCRIPTION: 9/6/94 COLLETTE G.L. SAMIE * 2	
	FIELD 418.1 CALCULATIONS SAMPLE I.D. LAB No: WEIGHT (g) ml. FREON DILUTION READING CALC. ppm	
	SCALE	
	O FT PERIMETER N OVM PIT PROFILE	
:	SAMPLE FIELD HEADSPACE ID FIELD HEADSPACE PID (ppn)	
	$\begin{bmatrix} 1\\2\\3 \end{bmatrix}$	
	7 4 5	
	47'	
	GEOWD,WATER	
	LAB SAMPLES	
	65' 9/6/94 PWZ BEX	i.
	TRAVEL NOTES: CALLOUT: 8/23/94 ONSITE:	\dashv
- 1	CALLOUT: 8(23/94 ONSITE:	_ !



AROMATIC VOLATILE ORGANICS

8/24/94

Attn:

Nelson Velez

Date:

8/24/94

Company: Blagg Engineering

Lab ID:

1835

Address:

P.O. Box 87

Sample ID:

2640

City, State: Bloomfield, NM 87413

Job No.

2-1000

Project Name:

Jennapah A1

Project Location:

PW 1 @ GW (22') - Production Pit

Date:

Sampled by:

NV DLA Date:

8/23/94 Time: 10:40

Analyzed by: Sample Matrix:

Liquid

Aromatic Volatile Organics

Component	Measured Concentration ug/L	Detection Limit Concentration ug/L
Benzene	235	0.2
Toluene	2,638	0.2
Ethylbenzene	38	0.2
m,p-Xylene	3,316	0.2
m,p-Xylene o-Xylene	790	0.2
	TOTAL 7,017 ug/L	·

ND - Not Detectable

Method - SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography

Approved by: Date:



AROMATIC VOLATILE ORGANICS

Attn:

R. E. O'Neill

Date:

9/7/94

Company: Blagg Engineering

Lab ID:

2060

Address:

P.O. Box 87

Sample ID:

2894

City, State: Bloomfiled, NM 87413

Job No.

2-1000

Project Name:

Jennapah A #1

Project Location:

Production Pit @ G.W.

Date:

Sampled by:

REO

Date:

9/6/94 9/7/94 Time:

11:45

Analyzed by: Sample Matrix: DLA Liquid

Aromatic Volatile Organics

Component	Measured Concentration ug/L	Detection Limit Concentration ug/L
Benzene	30.6	0.2
Toluene	6.3	0.2
Ethylbenzene	50.6	0.2
m,p-Xylene	1,082	0.2
o-Xylene	231	0.2
	TOTAL 1,400 ug/L	

ND - Not Detectable

Method - SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography

Approved by: _ \tag{4/94}