

3R - 84

**GENERAL
CORRESPONDENCE**

YEAR(S):

1997 - 2004



3284

FEB 05 2004

February 3, 2004

OIL CONSERVATION
DIVISION

#5114135

Mr. William C. Olson
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Department
1220 South St. Francis Dr.
Santa Fe, NM 87505

RE: PLAN FOR FUTURE WORK, CONOCOPHILLIPS B COM 1E

Dear Mr. Olson:

Souder, Miller & Associates (SMA) has prepared this letter on behalf of ConocoPhillips to confirm the results of the January 27, 2004 meeting between ConocoPhillips and the Oil Conservation Division (OCD). The meeting established a plan for future work on the ConocoPhillips B COM 1E site. ConocoPhillips and SMA understand that the plan consists of:

1. Let MW-1 stand without skimming for 2-3 weeks. Evaluate non aqueous phase liquid (NAPL) recovery rate in MW-1 with a bail down test if adequate NAPL accumulates. Based on test results, establish NAPL removal procedure. Given NAPL recovery rates to date, the procedure will likely be either continued passive skimming or periodic hand bailing. All wells will be monitored for ground water elevation data quarterly. Brief annual letter reports on NAPL recovery results and the potentiometric surface will be prepared.
2. When NAPL is no longer measurable in MW-1, commence once annual monitoring events on MW-1 and MW-6 for benzene, toluene, ethylbenzene and total xylenes by EPA Method 8021B and for biodegradation parameters. All site wells will be monitored for ground water elevation data. Prepare annual summary reports of site activities. The reports will recommend monitoring plan modifications as necessary.
3. When contaminant concentrations in MW-1 are below New Mexico Water Quality Control Commission standards, commence quarterly monitoring of MW-1 and MW-6 for site closure until four quarters of below standard data are achieved. Other site wells will be monitored only during the final, fourth quarter to verify site closure.

If this is not OCD's understanding of the plan for future work, please inform me within 10 business days (505-473-9211, rsa@soudermiller.com). ConocoPhillips and SMA

Mr. William Olson
February 3, 2004
Page 2

appreciated the opportunity to meet with you and establish a path towards closure for this project.

Sincerely,

SOUDER, MILLER & ASSOCIATES

A handwritten signature in black ink, appearing to read "R. S. Allan", written over the printed name.

Reid S. Allan
Vice President/Senior Scientist

Cc: Mr. Neal Goates, ConocoPhillips



RECEIVED

February 26, 2003

FEB 28 2003

Bill Olsen,
New Mexico Oil Conservation Division
1200 S. St. Francis Drive
Santa Fe, NM 87505

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

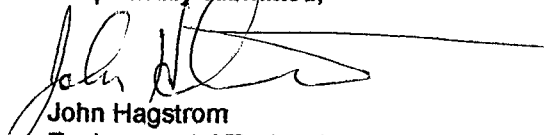
RE: Conoco Groundwater Report Summary

On behalf of ConocoPhillips **Souder Miller and Associates**, is submitting the enclosed 2002 Annual Groundwater report for five (5) locations. Salmon #1 is included on this table although no Annual Report is being submitted.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
Farmington B Com 1	Unit H, S 12, T29N, R12W	BTEX has been at or below NMWQCC standards, for four quarters: need to sample for closure during March 2003, and submit Pit Closure forms to OCD.
Nell-Hall # 1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998.
Farmington C Com 1	Unit L, S 15, T29N, R13W	BTEX has been at or below NMWQCC standards, for four quarters: closure sampling has been accomplished, Pit Closure Forms are attached.
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Free product is still present in MW-1. Sampling stopped at this time IAW NMOCOD direction, more aggressive recovery program being investigated.
Salmon # 1	Unit P, S 30, T29N, R11W	Site has been closed and monitoring wells have been properly plugged and abandoned.
S&K # 1	Unit L, S 29, T29N, R11W	MW-NE and SB 12 have high Benzene levels all others at or below NMWQCC standards, continue monitoring of MW-NE and SB 12.

If there are any questions or concerns on this matter, feel free to contact me at (505) 325-5667.
Thank you for your time and considerations.

Respectfully submitted,


John Hagstrom
Environmental Technician
Souder Miller and Associates

CC:

Neal Goates, RM&R Site Manager, ConocoPhillips, PO Box 2197, Houston, TX 77252-2197
Denny Foust, New Mexico Oil Conservation Division, 1000 Rio Brazos, Aztec, NM 87410
Bill Liess, BLM, 1235 La Plata Hwy., Farmington, NM 87401
Michael Nelson, ConocoPhillips, PO Box 2197, Houston, TX 77252-2197
File

Tel. (505) 325-5667

Fax (505) 327-1496

P. O. BOX 2606 • FARMINGTON, NM 87499

-TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT-

3284



RECEIVED

February 22, 2002

Bill Olson
New Mexico Oil Conservation Division
1220 South St. Francis Drive.
Santa Fe, New Mexico 87505

FEB 25 2002

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

RE: Conoco Groundwater Report Summary

On behalf of Conoco **On Site Technologies Limited Partnership**, is submitting the enclosed 2001 Annual Groundwater report for Ten (10) sites.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
Farmington B Com 1	Unit H, S 12, T29N, R12W	WSP-1 still has high BTEX, all other at or below NMWQCC standards, continue monitoring of WSP #1
Nell-Hall#1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington C Com 1	Unit L, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Free product is still present in MW-1. Sampling stopped at this time IAW NMOCD direction, more aggressive recovery program being investigated.
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 has had BTEX levels below NMWQCC standards for the last six quarters. Close site and properly plug and abandon monitoring wells.
S&K1	Unit L, S 29, T29N, R11W	SB 12 still has high BTEX, all others at or below NMWQCC standards, continue monitoring of SB 12.

If there are any questions or concerns on this matter, feel free to contact me at (505) 325-5667.

Thank you for your time and considerations.

Respectfully submitted,

John Hagstrom
Environmental Technician
On Site Technologies Limited Partnership

CC:

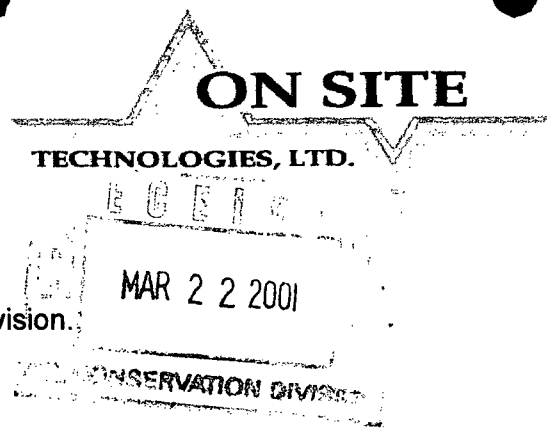
Gary Ledbetter, SHEAR, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 87401
Bill Liess, BLM 1235 La Plata HWY, Farmington, NM 87401
Denny Foust, NMOCD 1000 Rio Brazos, Aztec, NM 87410
John Cofer, Sr. Environmental Specialist, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 87401
File

PO Box 2606
Farmington, NM 87499

505-325-5667

FAX: 505-327-1496

89



February 27, 2001

Mr. Bill Olson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Conoco Groundwater Report Summary

On behalf of Conoco **On Site Technologies Limited Partnership**, is submitting the enclosed 2000 Annual Groundwater report for Ten (10) sites.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
Farmington B Com 1	Unit H, S 12, T29N, R12W	WSP-1 still has high BTEX, all other at or below NMWQCC standards, continue monitoring of WSP #1
Nell-Hall#1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington C Com 1	Unit L, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Free product is still present in MW-1. Sampling stopped at this time IAW NMOCOD direction, more aggressive recovery program being investigated.
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 still has high BTEX, Continue monitoring in accordance with NMOCOD letter dated September, 1998.
San Juan 28-7#126	Unit M, S 1, T27N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#219	Unit N, S 20, T28N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
S&K1	Unit L, S 29, T29N, R11W	Research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#19	Unit G, S 25, T28N, R7W	research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
Farmington Com #1	Unit P, Sec 11, T29N, R13W	Monitoring wells and piezometer plug and abandoned IAW NMOCOD Letter dated December 13, 2000
Shephard & Kelsey #1E	Unit D, Sec. 29, T29N, R11W	Monitoring wells plug and abandoned IAW NMOCOD Letter dated December 14, 2000

PO Box 2606
Farmington, NM 87499

505-325-5667

FAX: 505-327-1496

Conoco Inc.
Summary of 1999 Ground Water Monitoring
On Site Technologies, Ltd.

February 27, 2001

If there are any questions or concerns on this matter, feel free to contact me at (505) 325-5667.

Thank you for your time and considerations.

Respectfully submitted,



Larry Trujillo, CHMM
Environmental Specialist
On Site Technologies Limited Partnership

CC:

Gary Ledbetter, SHEAR, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 87401
John Cofer, Sr. Environmental Specialist, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 874
Denny Foust, NMOCD 1000 Rio Brazos, Aztec, NM 87410
Bill Liess, BLM 1235 La Plata HWY, Farmington, NM 87401
File

ON SITE

TECHNOLOGIES, LTD.

SEP - 1999

August 9, 1999

Mr. Wm. "Bill" Olsen, Hydrologist
NMOCD

2040 S. PACHECO ST
Santa Fe, NM, 87505

RE: Conoco Groundwater Report Summary

On behalf of Conoco Inc., *On Site Technologies Limited Partnership* requests a status of approval for the corrective actions on the following list of well locations.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
RECOMMEND	CONTINUED	MONITORING
Farmington B Com 1	Unit H, S 12, T29N, R12W	WSP-1 still has high BTEX, all other at or below NMWQCC standards, continue monitoring of WSP #1
San Juan 28-7#19	Unit G, S 25, T28N, R7W	Continue monitoring, BTEX levels still above NMWQCC standards
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Continue monitoring, BTEX levels still above NMWQCC standards
Nell-Hall#1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington C Com 1	Unit L, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 still has high BTEX, Continue monitoring in accordance with NMOCD letter dated September, 1998
RECOMMEND	CLOSURE	
San Juan 28-7#126	Unit M, S 1, T27N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure
San Juan 28-7#219	Unit N, S 20, T28N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure
S&K1	Unit L, S 29, T29N, R11W	4 quarters of sampling below NMWQCC standards recommend closure.
Farmington Com 1	Unit P, S 11, T29N, R13W	Contamination level in MW 1 below OCD action levels for the last four quarters, MW2 and MW3 historically have not had any contamination above NMWQCC standards. Recommend closure of the location.
S&K1E	Unit D, S 29, T29N, R11W	4 quarters of sampling below OCD action levels recommend closure.

PO Box 2606
Farmington, NM

505-325-5667

FAX: 505-327-1496



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FEB 19 1999

Letter of Transmittal

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

ATTENTION:

DATE: February 17, 1999

Mr. Bill Olson
New Mexico Oil Conservation Division.
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Conoco's 1998 Annual Groundwater Report

Dear Mr. Olson:

On behalf of Conoco *On Site Technologies Limited Partnership*, is submitting the enclosed 1998 Annual Groundwater report for ten (10) sites.

Number of Originals	Description
1	Shephard & Kelsey #1E Unit D, Sec. 29, T29N, R11W
1	Shephard & Kelsey #1 Unit L, Sec. 29, T29N, R11W
1	Salmon #1 Unit P, Sec. 30, T29N, R7W
1	Nell-Hall #1 Unit, M, Sec 7, T30N, R11W
1	San Juan 28-7-19 Unit G, Sec. 25, T28N, R7W
1	San Juan 28-7-47 Unit A, Sec. 20, T28N, R7W
1	Farmington Com #1 Unit P, Sec 11, T29N, R13W
1	Farmington B Com #1 Unit H, T29N R13W
1	Farmington C Com 1 Unit L, Sec. 15, T29N, R13W
1	Farmington B Com 1E Unit O, Sec 15, T29, R13W

Thank you,

A handwritten signature in black ink, appearing to read "Larry Trujillo", is written over the typed name.

Larry Trujillo
Sr. Environmental Technician

CC:

Shirley Ebert
Neal Goates
Denny Foust
File

PO Box 2606
Farmington, NM

505-325-5667

FAX: 505-327-1496



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-235-437-314

Ms. Shirley Ebert
Conoco, Inc.
3314 Bloomfield Hwy.
Farmington, New Mexico 87401

**RE: GROUND WATER INVESTIGATIONS
FARMINGTON B COM #1E WELL SITE**

Dear Ms. Ebert:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco, Inc.'s (Conoco) April 14, 1998 "INITIAL GROUNDWATER MONITORING REPORT FOR FARMINGTON B COM #1E, UNIT O, SEC 15, T29N, R13W" which was submitted on behalf of Conoco by their consultant On Site Technologies, Ltd. This document contains the results of Conoco's investigation, of ground water contamination related to production activities at Conoco's Farmington B Com #1E well site.

The data in the above referenced report shows that the extent of ground water contamination has not been determined. The OCD requires that Conoco complete the definition of the extent of ground water contamination at this site pursuant to Conoco's prior approved ground water investigation and remediation plan for the San Juan Basin.

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Larry Trujillo, On Site Technologies, Ltd.

Z 235 437 314

US Postal Service

Receipt for Certified Mail

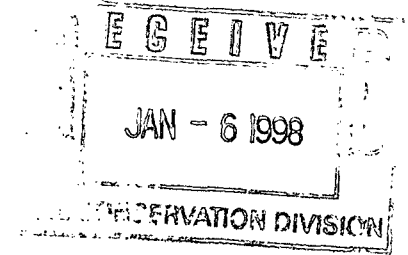
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PS Form 3800, April 1995

On Site Technologies, Ltd.



Letter of Transmittal

DATE: January 5, 1998

ATTENTION:

Mr. Bill Olson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

PROJECT REFERENCE:

PROJECT No. 4-1373 & 4-1374

No. Originals	No. Copies	Description
	2	FMTN C-COM1 & FMTN B-COM 1E

REMARKS:

Dear Mr. Olson,

At Conoco's request, we are sending you copies of the excavation summaries for Farmington C-Com 1, Unit L Sec. 15, T29N, R13W and Farmington B-Com 1E, Unit O, Sec. 15, T29N, R13W.

SIGNATURE:

A handwritten signature in black ink, appearing to read "Larry Trujillo".

Larry Trujillo
Sr. Environmental Technician
On Site Technologies Limited Partnership



RECEIVED

C. John Coy
SHEAR Specialist
Exploration, Production &
Natural Gas, North America

AUG 28 1997

Environmental Bureau
Oil Conservation Division

Conoco Inc.
3315 Bloomfield Hwy.
Farmington, NM 87401
Bus. (505) 324-5813
Fax (505) 324-5825

August 22, 1997

New Mexico Oil Conservation Division
Attn.: Mr. William C. Olson
2040 S. Pacheco
Santa Fe, New Mexico 87505

8/29/97 1500 hrs.
Verbal approval given to
John Coy voice mail
William Olson

RE: NMOCD Letter Dated July 28, 1997 Regarding Conoco's Annual Pit
Closure Summary and Ground Water Impacts

Dear Mr. Olson:

In response to and acknowledgement of the referenced letter, we offer the
following item by item discussion and progress report.

1. General Conditions
 - a. Ground water sampling conducted after August 10, 1997 will include analysis for cations/anions and RCRA metals from the well at the source on each location. If a sheen is noted, the water will also be analyzed for Polynuclear Aromatic Hydrocarbons (PAH). If the well at the source exhibits results above regulatory limits, additional wells at the location as well as future sampling events will be analyzed for those parameters. The results of these analyses will be included in subsequent annual reports.
 - b. A comprehensive ground water remediation plan and long term ground water monitoring plan will be submitted to NMOCD as required by October 10, 1997.
 - c. Future annual ground water reports will be submitted to NMOCD by March 1 of each year. Each site will be treated as a separate case and information presented will include:
 - i. A summary of ground water remediation and monitoring activities for the prior calendar year.
 - ii. A summary table of all past and present ground water quality analytical results with copies of laboratory analytical results for samples taken during the prior calendar year.
 - iii. An updated site map showing the locations of relevant features (i.e. well head, pits, former pits, monitor wells, etc.)
 - iv. A quarterly ground water potentiometric map.
 - v. A geologic log and well completion diagram for each monitor well.

2. Status report of remedial actions for the Farmington Com #1, Farmington C Com #1, and Farmington B Com #1E; ground water remediation work plan for the Farmington B Com #1:

Conoco, Inc. has contracted with On Site Technologies Limited of Farmington, NM to determine a scope of work, solicit bids, procure and supervise a qualified excavation and hauling subcontractor to remove the impacted soils delineated in the April, 1997 Investigation Reports for each site. However, On Site has experienced considerable difficulty obtaining responses from contractors due to the intense level of activity in the San Juan Basin. Two bids have now been received and a contractor, Consolidated Constructors, selected based on both price and timely availability of equipment. Even so, due to prior commitments, that contractor cannot mobilize until after August 29, 1997. On Site plans to commence work on the Farmington C Com #1 and then the Farmington B Com #1E as soon as the contractor's schedule permits pending access permission from an adjacent landowner outside the C Com #1 location fence.

In addition to the difficulty of obtaining a contractor, we are aware that Merrion Oil, the current operator of these locations, has requested an extension until November, 1997 on the Farmington Com #1 based on a substantial risk to the public due to the proximity of the location to a City-owned public park and recreation area.

For the reasons given above, we request that an extension be granted for the soils remediation at the Farmington C Com #1, and Farmington B Com #1E until September 30, 1997 and at the Farmington Com #1 until the November date requested by Merrion Oil.

Furthermore, on the Farmington B Com #1 where the soil remediation has been completed, another ground water sample event is due in mid-September. We believe that the information from that event will be very helpful in developing an effective ground water remediation plan for the B Com #1. Additionally, the analyses specified in Item 1.a. have not been performed at this location and will be run on the September samples.

Regarding ground water remediation work plans, we request that extensions be granted for each site as noted below:

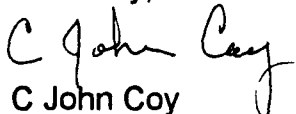
Farmington Com #1	November 30, 1997
Farmington C Com #1	October 10, 1997
Farmington B Com #1E	October 10, 1997
Farmington B Com #1	October 10, 1997

3. Status of the Sheperd & Kelsey #1E (Separator pit)

On August 19, 1997, On Site Technologies advanced four test holes, using a direct-punch probing system, in the area of the separator pit at the Shepard & Kelsey #1E for the purpose of determining the extent of ground water contamination. Soil samples were taken at the soil/water interface at approximately five feet below ground surface. Field headspace results for those samples ranged from 0.0 to 5.9 units. Cobbles were encountered at eight to ten feet below surface. Monitoring wells were installed in the two test holes with the highest headspace readings of 2.9 and 5.9 units. The wells were then developed and, the next day, sampled. The existing monitor well (MW 1) in the pit proper was also purged, tested for pH and conductivity, and sampled. MW 1 is being analyzed for BTEX, API Water suite, Total RCRA Metals, and Polynuclear Aromatic Hydrocarbons. Samples from MW 2 and MW 3, the new wells, are being analyzed for BTEX only as directed. A report delineating the extent of ground water contamination at this location will be prepared upon receipt of laboratory analytical results.

We hope that the information above meets with your approval and adequately addresses the requirements delineated in your letter of July 28, 1997. We will keep you and Mr. Denny Foust of your Aztec office advised of our progress on the Farmington locations. If you have any questions or need further information, please contact me at (505) 324-5813.

Sincerely,



C John Coy
Field SHEAR Specialist
CONOCO, Inc.

CJC/csg

xc: Neil Goates, Conoco, Inc.
Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Myke Lane, Cindy Gray, On Site Technologies

file: CONOCOD.let