

3R - 97

APPROVALS

YEAR(S):

2003-1994



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

March 27, 2003

Mr. Neal Goates
ConocoPhillips
P.O. Box-2197
Midland, Texas 77252-2197

**RE: ANNUAL GROUND WATER REPORT
SAN JUAN BASIN PIT CLOSURE PROJECT**

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has reviewed ConocoPhillips February 26, 2003 "CONOCO GROUNDWATER REPORT SUMMARY" which was submitted on behalf of ConocoPhillips by their consultant Souder Miller and Associates. This document contains the results of annual ground water monitoring at a number of former unlined pit sites in the San Juan Basin and requests closure approval of site remediation and monitoring actions at 3 pit sites.

Below is the OCD's review of the above referenced document:

A. The soil and ground water remedial activities conducted at the sites listed below are satisfactory and the OCD **approves** of final closure of these sites on the condition that all site monitor wells be plugged and abandoned by cutting the casing off below ground surface and grouting the well annulus from the base to the surface with a cement grout containing 3-5% bentonite. Please be advised that OCD approval does not relieve ConocoPhillips of responsibility if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with any other federal, state or local laws and regulations.

1. Farmington C Com #1 (Separator/Dehy pit) Unit L, Sec. 15, T29N, R13W.
2. Farmington C Com #1 (Surface Depression) Unit L, Sec. 15, T29N, R13W.
3. Farmington C Com #1 (Tank drain pit) Unit L, Sec. 15, T29N, R13W.

- B. The report for the Farmington B Com #1E site states that ground water monitoring was ceased until free product recovery from site monitor well MW-1 has been completed. According to the free product recovery log in the report, there has been no measurable free product in MW-1 since March 12, 2002. Therefore, the OCD requires that ConocoPhillips reinstitute the ground water monitoring program for this site.
- C. The report for the ~~Shawnee~~ ~~Elmer~~ #1 site shows that benzene concentrations in ground water in the furthest downgradient monitor wells MW-NE and SB-12 are consistently above New Mexico Water Quality Control Commission (WQCC) standards. Therefore, the OCD requires that ConocoPhillips install additional downgradient monitor wells, pursuant to ConocoPhillips previously approved work plan, to define the extent of contamination that is above WQCC standards. Once installed these monitor wells shall be included in the ground water monitoring plan for the site.

If you have any questions, please call me at (505) 476-3491.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
John Hagstrom, Souder Miller and Associates



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

December 14, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-3990

Ms. Shirley Ebert
Conoco, Inc.
10 Desta Dr., Suite 100W
Midland, Texas 79705-4500

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Ms. Ebert:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco Inc's (Conoco) February 14, 2000 "CONOCO GROUNDWATER REPORT SUMMARY" and accompanying pit closure reports which were submitted on behalf of Conoco by their consultant On Site Technologies, Ltd. These documents contain the results of annual ground water monitoring at a number of former unlined pit sites in the San Juan Basin and requests closure approval of site remediation and monitoring actions at 5 sites.

Below is the OCD's review of the above referenced documents:

- A. The soil and ground water remedial activities conducted at the sites listed below are satisfactory and the OCD **approves** of final site closure on the condition that all site monitor wells be plugged and abandoned by pulling the casing and grouting the annulus from the base to the surface with a cement grout containing 3-5% bentonite. Please be advised that OCD approval does not relieve Conoco of responsibility if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Conoco of responsibility for compliance with any other federal, state or local laws and regulations.

1. Shephard & Kelsey #1E (Separator pit) Unit D, Sec. 29, T29N, R11W.

B. The ground water remedial actions at the sites listed below appear satisfactory. However, the pit closure forms for these sites do not contain any information on the soil remediation actions, the disposal of contaminated soils generated at the sites, land type, nor the exact location of the pit on the site. Therefore, final closure approval for these sites is **denied**. The OCD will reconsider issuing closure approval of these sites once Conoco submits completed OCD "Pit Remediation and Closure Report" forms for each site which includes the above information.

- | | | |
|----|---|------------------------------|
| 1. | San Juan 28-7 #126 (Dehy/separator pit) | Unit M, Sec. 01, T27N, R07W. |
| 2. | San Juan 28-7 #219 (Unknown pit) | Unit N, Sec. 20, T20N, R07W. |
| 3. | Shephard & Kelsey #1 (Unknown pit) | Unit L, Sec. 29, T29N, R11W. |

C. Final closure approval for the site listed below was issued under separate correspondence dated December 13, 2000.

- | | | |
|----|-----------------------------------|------------------------------|
| 1. | Farmington Com #1 (Separator pit) | Unit P, Sec. 11, T29N, R11W. |
|----|-----------------------------------|------------------------------|

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.



February 14, 2000

Mr. Wm. "Bill" Olsen, Hydrologist
NMOCD
P. O. Box 2088
Santa Fe, NM, 87504 - 2088

RE: Conoco Groundwater Report Summary

On behalf of Conoco **On Site Technologies Limited Partnership**, is submitting the enclosed 1999 Annual Groundwater report for twelve (12) 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
San Juan 28-7#19	Unit G, S 25, T28N, R7W	Sample well in March, 2000, if below NMWQCC standard, discontinue sampling and complete pit closure report.
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Sample well in March, 2000, if below NMWQCC standard, discontinue sampling and complete pit closure report.
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. ORC socks are saturated and appear to have become ineffective (refer to enclosed report).
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 still has high BTEX, Continue monitoring in accordance with NMOCD letter dated September, 1998, ASTs installed on the location by the landowner (refer to enclosed report) up gradient of DG#2.
San Juan 28-7#126	Unit M, S 1, T27N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure, pit closure report enclosed.
San Juan 28-7#219	Unit N, S 20, T28N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure, pit closure report enclosed.
S&K1	Unit L, S 29, T29N, R11W	4 quarters of sampling below NMWQCC standards recommend closure, pit closure report enclosed.
Farmington Com 1	Unit P, S 11, T29N, R13W	4 quarters of sampling below NMWQCC standards recommend closure, pit closure report enclosed.
S&K1E	Unit D, S 29, T29N, R11W	4 quarters of sampling below OCD action levels recommend closure, pit closure report enclosed.

PO Box 2606
Farmington, NM

505-325-5667

FAX: 505-327-1496

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

February 14, 2000

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.

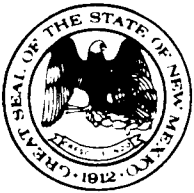
Respectfully submitted,



Larry Trujillo, CHMM
Environmental Specialist
On Site Technologies Limited Partnership

CC:

Shirley Ebert, SHEAR, Conoco Inc., Farmington Office
Neal Goates, Sr. Environmental Specialist, Conoco Inc.
Denny Foust, NMOCD Aztec Office
Bill Liess, BLM Farmington Office
File



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

May 23, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-113

Ms. Judy A. McLemore
Environmental Coordinator
Conoco, Inc.
10 Desta Drive, Suite 100W
Midland, Texas 79705-4500

**RE: ANNUAL SAN JUAN BASIN PIT CLOSURE REPORT
CONOCO, INC.**

Dear Ms. McLemore:

The New Mexico Oil Conservation Division (OCD) has completed a review of Conoco's March 16, 1994, "CONOCO ANNUAL SUMMARY PIT CLOSURES" and May 14, 1994 "SAN JUAN BASIN GROUNDWATER SAMPLING RESULTS". These documents present the results of Conoco's pit closure activities in the San Juan Basin which were conducted during the 1993 calendar year and the results to Conoco's ground water investigations at the Nye Com 1E, Shepherd Kelsey 1 and Salmon 1 well sites. The documents also request OCD approval of Conoco's proposed remedial actions for contaminated ground water at the Shepherd & Kelsey 1 and Salmon 1 sites and closure of monitor wells at the Nye Com 1E site.

The above referenced ground water remedial action plans for the Shepherd Kelsey 1 and Salmon 1 well sites and monitor well closure at the Nye Com 1E well site **are approved with the following conditions:**

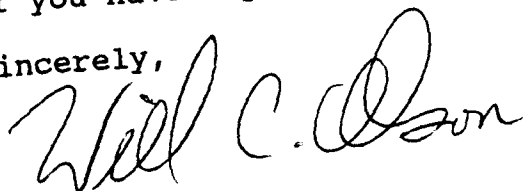
1. Upon removing the casing from the monitor wells at the Nye Com 1E site, the holes will be grouted to the surface with expanding cement.
2. Prior to removing any water from trenches at the Shepherd & Kelsey 1 site, Conoco will notify the OCD and receive approval of the proposed method of disposal of the waters.

Ms. Judy A. McLemore
May 23, 1994
Page 2

Please be advised that OCD approval does not relieve Conoco of liability should contamination exist which is beyond the scope of the plan or should the plan fail to adequately remediate contamination related to Conoco's activities. In addition, OCD approval does not relieve Conoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Aztec Office

P 111 334 113



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