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APPROVALS

YEAR(S):

1999 - 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

April 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-642

Ms. Nina Hutton
Cross Timbers Oil Company
810 Houston St., Suite 2000
Fort Worth, Texas 76102-6298

RE: PIT CLOSURE/GROUND WATER MONITORING REPORTS

Dear Ms. Hutton:

The New Mexico Oil Conservation Division (OCD) has reviewed Cross Timbers Oil Company's (CTOC) February 17, 1999 "CROSS TIMBERS OIL CO. (AMOCO) PIT CLOSURE/GROUNDWATER MONITORING REPORTS, SAN JUAN COUNTY, NEW MEXICO" which was submitted on behalf of CTOC by their consultant Blagg Engineering, Inc. This document contains the results of CTOC's investigation, remediation and monitoring of ground water contamination related to the disposal of oilfield wastes in unlined pits at 20 sites in the San Juan Basin and requests closure of the remedial actions.

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

- A. The soil and ground water remedial actions at the sites listed below are satisfactory and the OCD **approves** of the closure of these pit sites. Please be advised that OCD approval does not relieve CTOC of liability if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve CTOC of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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| 1. Abrams GC C #1 (Blow pit) | Unit F, Sec. 25, T29N, R10W. |
| 2. Anderson GC A#1(Blow pit) | Unit C, Sec. 28, T29N, R10W. |
| 3. Armenta GC A#1 (Blow pit) | Unit D, Sec. 27, T29N, R10W. |
| 4. Baca GC A#1 (Blow pit) | Unit H, Sec. 26, T29N, R10W. |
| 5. Baca GC A#1 (Dehy pit) | Unit H, Sec. 26, T29N, R10W. |
| 6. Chavez GC C#1R (Blow/separator pit) | Unit J, Sec. 23, T29N, R10W. |
| 7. Federal GC 3-1 (Blow pit) | Unit N, Sec. 23, T29N, R10W. |
| 8. Garcia GC B#1E (Blow pit) | Unit M, Sec. 21, T29N, R10W. |
| 9. Hare GC C#1 (Blow pit) | Unit M, Sec. 25, T29N, R10W. |
| 10. Hare GC C#1E (Blow pit) | Unit F, Sec. 25, T29N, R10W. |

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| 11. | Hare GC F#1 (Separator pit) | Unit G, Sec. 23, T29N, R11W. |
| 12. | Lefkovitz GC B#1 (Blow pit) | Unit A, Sec. 25, T29N, R10W. |
| 13. | Lefkovitz GC B#1 (Separator pit) | Unit A, Sec. 25, T29N, R10W. |
| 14. | Masden GC #1 (Separator pit) | Unit A, Sec. 28, T29N, R11W. |
| 15. | Romero GC A#1 (Separator pit) | Unit K, Sec. 27, T29N, R10W. |
| 16. | Stedje GC #1 (Blow pit) | Unit F, Sec. 27, T30N, R12W. |
| 17. | Stedje GC #1E (Separator pit) | Unit A, Sec. 27, T30N, R12W. |
| 18. | Trujillo GC A#1 (Blow pit) | Unit C, Sec. 28, T29N, R10W. |

B. The sites listed below have chloride and/or total dissolved solids (TDS) contamination of ground water in excess of New Mexico Water Quality Control Commission (WQCC) standards. In addition, the downgradient and/or lateral extent of chloride and/or TDS contamination in ground water at these sites has not been completely defined. Therefore, approval of the closure actions at these sites is **denied**. The OCD requires that CTOC investigate the extent of and remediate these contaminants at each site pursuant to the previously approved ground water management plan.

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| 1. | Baca GC A #1A (Blow/separator pit) | Unit F, Sec. 26, T29N, R10W. |
| 2. | Haney GC B#1E (Separator pit) | Unit M, Sec. 20, T29N, R10W. |

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Nelson Velez, Blagg Engineering, Inc.



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 12, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. P-269-269-227

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) August 17, 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 28 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. Jack Frost B#2 (Blow pit)	Unit D, Sec. 27, T27N, R10W.
2. JC Gordon D#1 (Blow pit)	Unit P, Sec. 22, T27N, R10W.
3. JC Gordon D#1 (Separator pit)	Unit P, Sec. 22, T27N, R10W.
4. JC Gordon D#2E (Blow pit)	Unit M, Sec. 22, T27N, R10W.
5. JC Gordon D#2E (Separator pit)	Unit M, Sec. 22, T27N, R10W.
6. JC Gordon E#1 (Separator pit)	Unit K, Sec. 23, T27N, R10W.
7. Heath GC A#1 (Blow pit)	Unit H, Sec. 32, T30N, R09W.
8. Heath GC A#1 (Separator pit)	Unit H, Sec. 32, T30N, R09W.
9. Heath WD B#1 (Separator pit)	Unit A, Sec. 31, T30N, R09W.
10. Heath WD B#1A (Separator pit)	Unit I, Sec. 31, T30N, R09W.
11. Heath WD B#3E (Separator pit)	Unit H, Sec. 31, T30N, R09W.
12. Heath WD B#5 (Blow pit)	Unit N, Sec. 31, T30N, R09W.
13. Houck GC A#1A (Separator pit)	Unit C, Sec. 06, T29N, R09W.
14. Houck GC D#1 (Blow pit)	Unit C, Sec. 06, T29N, R09W.
15. Johnson GC B#1E (Blow pit)	Unit I, Sec. 21, T27N, R10W.
16. State GC CB #1 (Separator pit)	Unit M, Sec. 32, T30N, R09W.
17. State GC CB #1A (Compressor pit)	Unit E, Sec. 32, T30N, R09W.
18. State GC CB #1A (Separator pit)	Unit E, Sec. 32, T30N, R09W.

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.

- 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.

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| 1. | JC Gordon C#1 (Blow pit) | Unit E, Sec. 23, T27N, R10W. |
| 2. | JC Gordon C#2 (Blow pit) | Unit K, Sec. 23, T27N, R10W. |
| 3. | JC Gordon D#1E (Separator pit) | Unit H, Sec. 22, T27N, R10W. |
| 4. | Schwerdtfeger A#1 (Blow pit) | Unit C, Sec. 36, T28N, R09W. |
| 5. | Schwerdtfeger A#1 (Tank drain pit) | Unit C, Sec. 36, T28N, R09W. |
| 6. | Schwerdtfeger A#1 (Separator I) | Unit C, Sec. 36, T28N, R09W. |
| 7. | Schwerdtfeger A#1 (Separator II) | Unit C, Sec. 36, T28N, R09W. |
| 8. | Warren #1 (Tank drain pit) | Unit N, Sec. 25, T28N, R09W. |

- C. The final pit remedial contaminant levels at the sites listed below are in excess of the OCD's recommended remediation levels. 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 sites. 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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| 1. | JC Gordon E#1 (Compressor pit) | Unit K, Sec. 23, T27N, R10W. |
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Mr. B.D. Shaw
December 12, 1996
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D. Ground waters at the sites listed below are 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.

1. Romero GC A#1 (Separator pit) Unit K, Sec. 27, T29N, R10W.

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
David Deardorff, New Mexico State Land Office