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APPROVALS

YEAR(S):

2000 - 1996



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: 5051-3983

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 21, 2000 "1999 ANNUAL GROUNDWATER REPORTS, SAN JUAN COUNTY, NEW MEXICO, PERMANENT CLOSURE REQUESTED" 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 soil and ground water contamination related to the disposal of oilfield wastes in unlined pits at 10 sites in the San Juan Basin and requests closure of the remedial actions.

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

- 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 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 CTOC of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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| 1. | Hare GC C #1 (Blow pit) | Unit M, Sec. 25, T29N, R10W. |
| 2. | Pearce GC #1E (Blow pit) | Unit J, Sec. 23, T29N, R11W. |
| 3. | Sanchez GC #1 (Blow pit) | Unit G, Sec. 28, T29N, R10W. |
| 4. | Texas National GC #1 (Blow pit) | Unit L, Sec. 19, T29N, R09W. |

B. The sites listed below were initially found to have ground water contaminated with benzene, toluene, ethylbenzene and xylene (BTEX) in excess of New Mexico Water Quality Control Commission (WQCC) standards. The reports for these sites contain only one subsequent round of water quality sampling events demonstrating that ground water currently meets WQCC standards. CTOC's approved ground water management plan required that all sites contaminated in excess of the WQCC standards would not be submitted for final closure until ground water quality at all monitoring points were below WQCC standards for a minimum of 4 consecutive quarters. Therefore, approval of the closure actions at these sites is **denied**. The OCD requires that CTOC continue ground water quality monitoring at these sites. Pursuant to the previously approved ground water management plan, the OCD will reconsider issuing final closure approval after CTOC demonstrates that ground water quality at all monitoring points are below WQCC standards for a minimum of 4 consecutive quarters.

In addition, the OCD could not find that any analytical results have been submitted for the landfarm activities at the Haney GC B#1E site. Please include these results in all future final closure requests.

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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. |
| 3. Masden GC #1E (Blow pit) | Unit D, Sec. 28, T29N, R11W. |
| 4. McDaniel GC B#1E (Dehy pit) | Unit F, Sec. 26, T29N, R10W. |
| 5. Snyder GC #1A (Blow pit) | Unit E, Sec. 19, T29N, R09W. |
| 6. Sullivan Frame A#1E (Dehy pit) | Unit A, Sec. 30, 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 18, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-231

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) July 14, 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 60 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**.

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| 1. | Atlantic Com LS #3A (Separator pit) | Unit E, Sec. 24, T31N, R10W. |
| 2. | Cole A#1E (Dehy pit) | Unit I, Sec. 35, T28N, R10W. |
| 3. | Florance #11A (Blow pit) | Unit J, Sec. 30, T30N, R08W. |
| 4. | Florance #11A (Separator pit) | Unit J, Sec. 30, T30N, R08W. |
| 5. | Florance #11A (Dehy pit) | Unit J, Sec. 30, T30N, R08W. |
| 6. | Florance #35 (Separator pit) | Unit A, Sec. 18, T30N, R08W. |
| 7. | Florance GC E#9A (Separator pit) | Unit J, Sec. 13, T30N, R09W. |
| 8. | Florance H#37 (Separator pit) | Unit H, Sec. 06, T30N, R08W. |
| 9. | Florance H#37A (Separator pit) | Unit J, Sec. 06, T30N, R08W. |
| 10. | Florance O#20A (Separator pit) | Unit J, Sec. 24, T30N, R09W. |
| 11. | Florance O#20A (Production pit) | Unit J, Sec. 24, T30N, R09W. |
| 12. | Gage #3 (Separator pit) | Unit E, Sec. 20, T30N, R10W. |
| 13. | Madeleine N. Galt H#1 (Blow pit) | Unit L, Sec. 01, T27N, R10W. |
| 14. | Madeleine N. Galt H#1E (Separator) | Unit E, Sec. 01, T27N, R10W. |
| 15. | Madeleine N. Galt H#1E (Blow pit) | Unit E, Sec. 01, T27N, R10W. |

Mr. B.D. Shaw
December 18, 1996
Page 2

16. JC Gordon D#4 (Blow pit)	Unit P, Sec. 23, T27N, R10W.
17. JC Gordon D#5 (Separator pit)	Unit C, Sec. 24, T27N, R10W.
18. JC Gordon D#5E (Blow/production)	Unit K, Sec. 24, T27N, R10W.
19. JC Gordon D#5E (Separator pit)	Unit K, Sec. 24, T27N, R10W.
20. WD Heath B#3 (Separator pit)	Unit O, Sec. 31, T30N, R09W.
21. WD Heath B#3 (Blow pit)	Unit O, Sec. 31, T30N, R09W.
22. Johnson Gas Com D#1 (Blow pit)	Unit G, Sec. 15, T30N, R12W.
23. Johnson Gas ComD#1 (Separator pit)	Unit G, Sec. 15, T30N, R12W.
24. Eva E. Martin A#1 (Blow pit)	Unit K, Sec. 14, T27N, R10W.
25. Eva E. Martin C#1 (Blow pit)	Unit A, Sec. 14, T27N, R10W.
26. Martin GC C#1E (Production pit)	Unit O, Sec. 11, T27N, R10W.
27. Martin GC F#1R (Separator pit)	Unit F, Sec. 14, T27N, R10W.
28. Martin GC F#1R (Blow pit)	Unit F, Sec. 14, T27N, R10W.
29. Martin GC G#1 (Production/blow pit)	Unit B, Sec. 14, T27N, R10W.
30. CM Morris Com A#1E (Separator pit)	Unit E, Sec. 13, T27N, R10W.
31. CM Morris Com A#1E (Production pit)	Unit E, Sec. 13, T27N, R10W.
32. CM Morris Com A#1E (Blow pit)	Unit E, Sec. 13, T27N, R10W.
33. CM Morris C#1 (Blow pit)	Unit F, Sec. 14, T27N, R10W.
34. Riddle #2 (Separator pit)	Unit N, Sec. 17, T30N, R09W.
35. RB Sullivan #3 (Blow pit)	Unit B, Sec. 11, T27N, R10W.
36. RB Sullivan #3 (Production pit)	Unit B, Sec. 11, 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.

- 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. Atlantic B LS #5A (Production pit)	Unit D, Sec. 05, T30N, R10W.
2. Gartner LS #7A (Separator pit)	Unit F, Sec. 26, T30N, R08W.
3. Gooch #2E (Dehy pit)	Unit C, Sec. 29, T28N, R08W.
4. Gooch #2E (Separator pit)	Unit C, Sec. 29, T28N, R08W.
5. JC Gordon B#1 (Blow/production pit)	Unit C, Sec. 24, T27N, R10W.
6. CM Morris Com A#1 (Separator pit)	Unit L, Sec. 13, T27N, R10W.
7. CM Morris Com A#1 (Blow pit)	Unit L, Sec. 13, T27N, R10W.

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| 8. | RB Sullivan #1 (Blow pit) | Unit G, Sec. 11, T27N, R10W. |
| 9. | VCU #3 (Blow pit) | Unit G, Sec. 22, T28N, R04W. |
| 10. | VCU #9 (Blow pit) | Unit P, Sec. 15, T28N, R04W. |
| 11. | VCU #14 (Blow pit) | Unit D, Sec. 23, T28N, R04W. |

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. | Florence #11A (Production pit) | Unit J, Sec. 30, T30N, R08W. |
| 2. | Florence #40 (Separator pit) | Unit G, Sec. 21, T30N, R08W. |
| 3. | Madeleine N. Galt H#1 (Separator) | Unit L, Sec. 01, T27N, R10W. |
| 4. | Johnson GC D#1 (East abandoned pit) | Unit G, Sec. 15, T30N, R12W. |
| 5. | Johnson GC D#1 (West abandoned pit) | Unit G, Sec. 15, T30N, R12W. |
| 6. | Martin GC C#1E (Separator pit) | Unit O, Sec. 11, T27N, R10W. |
| 7. | Martin GC G#1 (Separator pit) | Unit B, Sec. 14, T27N, R10W. |
| 8. | Sandoval GC C#1 (Blow pit) | Unit B, Sec. 35, T30N, R09W. |
| 9. | Sandoval GC C#1 (Separator pit) | Unit B, Sec. 35, T30N, R09W. |
| 10. | RB Sullivan #3 (Separator pit) | Unit B, Sec. 11, T27N, R10W. |

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. In addition, 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.

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| 1. | GCU #145 (Blow pit) | Unit A, Sec. 26, T29N, R12W. |
| 2. | GCU #145 (Separator pit) | Unit A, Sec. 26, T29N, R12W. |
| 3. | Sullivan Frame GU A#1E (Dehy pit) | Unit A, Sec. 30, T29N, R10W. |

Mr. B.D. Shaw
December 18, 1996
Page 4

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,

A handwritten signature in black ink, appearing to read "Will C. Olson". The signature is fluid and cursive, with the first name "Will" being more prominent.

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Aztec District Office
Bill Liess, BLM Farmington District Office