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GENERAL CORRESPONDENCE

YEAR(S): 1999-1994

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 21, 1999

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO: Z-274-520-641</u>

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

RE: SAN JUAN BASIN GROUND WATER MONITORING REPORTS

Dear Ms. Hutton:

The New Mexico Oil Conservation Division (OCD) has reviewed Cross Timbers Oil Company's (CTOC) February 11, 1999 "CROSS TIMBERS OIL CO. GROUNDWATER MONITORING (AMOCO) 1996-1998 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 7 sites in the San Juan Basin.

Based upon a review of the above referenced documents, the OCD has the following comments and requirements:

1. The downgradient and/or lateral extent of chloride and/or total dissolved solids contamination at the sites listed below has not been completely defined. The OCD requires that CTOC completely define the extent of these contaminants at each site pursuant to the previously approved ground water management plan for these sites.

-	Bergin GC #1E	Unit F, Sec. 21, T29N, R11W
-	Rowland GC #1	Unit P, Sec. 25, T30N, R12W
-	State GC BS #1	Unit F, Sec. 21, T29N, R11W
-	Sullivan GC D#1	Unit B, Sec. 26, T29N, R11W

2. The downgradient and/or lateral extent of benzene, toluene, ethylbenzene, xylene (BTEX), chloride and/or total dissolved solids contamination at the sites listed below has not been completely defined. The OCD requires that CTOC completely define the extent of these contaminants at each site pursuant to the previously approved ground water management plan for these sites.

-	Bruington GC #1	Unit E, Sec. 14, T29N, R11W
-	Valdez A #1E	Unit G, Sec. 24, T29N, R11W

- 3. A review of the sampling data shows that during some samplings only ground water from the monitor wells at the source is sampled and there is no downgradient monitoring to show that contaminated ground water is contained. In order to effectively monitor contaminant migration, the OCD requires that the ground water monitoring plan be modified to include additional ground water sampling of all monitor wells at each site on an annual basis. During the annual sampling event ground water from all monitor wells will be sampled and analyzed for BTEX, TDS, polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) cations and anions and metals using EPA approved methods and quality assurance/quality control procedures. Specific analytes may be dropped from the annual sampling event for certain sites if that analyte has not been found to be above WOCC standard in the sites source areas and the reasons for dropping those analytes are included in the annual reports. This sampling requirement will also be added to the ground water monitoring plan for all future ground water sampling at all CTOC sites with contaminated ground water.
- CTOC recently purchased a number of well sites in the San Juan Basin from Amoco. 4. Some of these sites were found to have ground water contamination which was discovered by Amoco during pit closure activities. The OCD does not have a listing of status of these sites. Please provide the OCD with a listing of all CTOC well sites in the San Juan Basin at which the presence of ground water was discovered during pit assessment or closure activities and the status of each site.

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

Sincerely.

William C. Olson Hydrologist Environmental Bureau

Denny Foust, OCD Aztec District Office XC: Nelson Velez, Blagg Engineering, Inc.

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413 Phone: (505) 632-1199 Fax: (505) 632-3903

February 11, 1999

RECEIVED

FEB 1 5 1999

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Mr. William C. Olson -Hydrogeologist Environmental Bureau New Mexico Oil Conservation Division 2040 Pacheco State Land Building Santa Fe, New Mexico 87505

RE: Cross Timbers Oil Co. Groundwater Monitoring (Amoco) 1996-1998 Reports San Juan County, New Mexico

Dear Mr. Olson:

The attached reports on groundwater monitoring at eight (8) previously owned Amoco well locations is being submitted for your review. These well sites have been acquired by Cross Timbers Co. as of December, 1997. The well names are listed on the following page of this correspondence. The reports for each individual well site are laid out in the following order;

- 1) Brief description of all activities which occurred during the investigation, sampling procedures, and/or interpretations, conclusions, and possible recommendations.
- 2) A summary spreadsheet contains laboratory BTEX, general chemistry (if applicable), and any other pertinent information. The latest quarter/annual sampling results are shown along with all previous sampling conducted at the specified locations for comparison purposes.
- 3) Site and groundwater gradient maps, boring logs, and monitor well detail schematics.
- 4) Laboratory reports for each quarter/annual sampling event and a field summary spreadsheet revealing well elevations, water elevations, depth to water information, etc.
- 5) Quality Assurance/Quality Control data.

A copy of this report is also being submitted to Mr. Denny Foust at the Aztec NMOCD office. If you have any questions or comments concerning this report, please contact Blagg Engineering at 632-1199.

Respectfully submitted, Blagg Engineering, Inc.

Nelson Velez.

Staff Geologist

Attachments: Quarter/Annual Monitor Well Sampling Reports

xc: Denny Foust, NMOCD Aztec Office; Nina Hutton, Cross Timbers Oil Co.

NJV/njv

FEB99-WO.COV

Cross Timbers Oil Company Groundwater Monitoring Reports 1996-1998 Well Sites being submitted, February 1999

1)	Abrams J # 1	Unit I, Sec. 29, T29N, R10W
2)	Bergin GC # 1E	Unit F, Sec. 21, T29N, R11W
3)	Bruington GC # 1	Unit E, Sec. 14, T29N, R11W
4)	Rowland GC # 1	Unit P, Sec. 25, T30N, R12W
5)	State GC BS # 1	Unit K, Sec. 23, T29N, R11W
6)	Sullivan GC D # 1	Unit B, Sec. 26, T29N, R11W
7)	Valdez A # 1E	Unit G, Sec. 24, T29N, R11W

NJV/njv

FEB99-WO.COV

DISTICT II P.O. Draww DD. Arcan, NM 85211 DISTICT III 1000 Rio Brazos Rd, Azzec, NM 87410	gy, Minerals and Na OIL CONSERV P.O. Santa Fe, New	f New Mexico atural Resources Department VATION DIVISION Box 2088 Mexico 37504-2088 AND CLOSURE REPORT	DISTRICT OFFICE AND 1 COPY TO SANTA FE OFFICE
			lo lowfirm result
Operator: Amoco P	roduction Company	Telephone:	(505) - 326-9200
Address: 200 Amo	co Court. Farmingto	on. New Mexico 87401	•
Facility Or: 5	'LLIVAN GC	D1	
Well Name	R		
		Sec ZG T Z9A RILW County T	SAN TUPN
Pit Type: Separator			
Land Type: BLM, St	tate, Fee	_, Other	
(Attach diagram) Referen	mensions: lengt nce: wellhead y e from reference		_, depth _7'
		nce: 12 Degrees Ea	s- North X
			of st South
Depth To Ground Water (Vertical distance from contaminants to seasonal high water elevation of ground water)	:	Less than 50 feet 50 feet to 99 feet Greater than 100 feet	(10 points)
Wellhead Protection A (Less than 200 feet from a domestic water source, or 1000 feet from all other w	a private ; less than		(20 points) (0 points) <u>O</u>
Distance To Surface W (Horizontal distance to per lakes, ponds, rivers, structure irrigation canals and dite	erennial eams, creeks,	Less than 200 feet 200 feet to 1000 feet Greater than 1000 feet	(10 points)
		RANKING SCORE (TOTAL P	OINTS): <u>30</u>

	-		
Date Remediation Sta	arted:	Date Complete	5/5/94
Remediation Method:	Excavation $\underline{\times}$	Approx. cubic yards	
(Check all appropriate sections)	Landfarmed X	Insitu Bioremediatio	on
	Other		
	·		
Remediation Location (ie. landfarmed onsite, name and location of offsite facility)	n: Onsite \times Offsi	te	• •
General Description	Of Remedial Action:	· · · · · · · · · · · · · · · · · · ·	يى بەرەلىمە ئىھ
		• • • • • • • • • • • • • • • • • • •	
			···· -
	·		
Ground Water Encoun	tered: No	Yes <u>X</u> Depth	51
Final Pit: Closure Sampling: (if multiple samples,	Sample location <u>Refe</u>	R TO CLOSURE UERIFIC	ATION SHEET
attach sample results and diagram of sample	Sample depth <u>S</u>	+ 9'	
locations and depths)	Sample date <u>S-S-</u>	A	ne
	Sample Results		No. 1 Carlor Martinette
·	Benzene(ppm)		
	Total BTEX(ppm)		
	Field headspace	(ppm)	
-	TPH		· · · · ·
Ground Water Sample	: Yes <u>×</u> No	(If yes, attach sam	ple results)
OF MY KNOWLEDGE AND	AT THE INFORMATION AB BELIEF	OVE IS TRUE AND COM	PLETE TO THE BEST
DATE 5/6/94	/	RIIN	Shar
SIGNATURE BASI	hand PRINTED NA AND TITLE	ME Buddy D. Environmente	1 Coordinator

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<u> </u>	g #94000 209
CLIENT: Amoco ENVIROTECH Inc.	PIT NO: <u>C4229</u>
5796 US HWY 64, FARMINGTON, NM 87 (505) 632–0615	2401 C.□.C. N□: <u>3574</u>
FIELD REPORT: CLOSURE VERIFICATION	JOB NO: <u>92140</u> PAGE No: <u>1</u> of <u>1</u>
LOCATION: LEASE: SULLIVAN GC D WELL #: 1 PIT: blow UNIT: B SEC: ZG TWP: 29 NRNG: 11WBM: NM CNTY: SJ S CONTRACTOR: P Velagouez	DATE STARTED: <u>5/5/94</u> DATE FINISHED: <u>5/5/94</u> ENVIRONMENTAL SPECIALIST: NV
SOIL REMEDIATION: EXCAVATION APPROX 100_ FT. x _ 150 DISPOSAL FACILITY: _ 100 farmed on-site LAND USE: _ BLM	
FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY <u>160</u> DEPTH TO GROUNDWATER: <u><50</u> NEAREST SURFACE WATER: <u><100</u> NEARE NMOCD RANKING SCORE: <u>30</u> NMOCD TPH CLOSURE STD: <u>100</u> PPM SOIL AND EXCAVATION DESCRIPTION: previously excavated	
Collected 2 water samples for BTEX	time: 1155;1200

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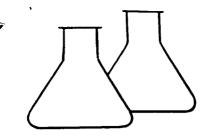
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5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615 • FAX: (505) 632-1865

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client:	Amoco	Project #:	92140
Sample ID:	105′	Date Reported:	05-06-94
Laboratory Number:	7357	Date Sampled:	05-05-94
Sample Matrix:	Water	Date Received:	05-06-94
Preservative:	HgCl and Cool	Date Analyzed:	05-06-94
Condition:	Cool and Intact	Analysis Requested:	BTEX

Concentration (ug/L)	Limit (ug/L)
1.9	0.2
26.4	0.4
12.0	. 0.3
114	0.4
23.2	0.4
	(ug/L) 1.9 26.4 12.0 114

SURROGATE RECOVERIES:

Parameter	Percent Recovery
** -* -* -* -* -* -* -*	
Trifluorotoluene	97 %
Bromofluorobenzen	e 101 %

Method: Method 5030A, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992

> Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986

ND - Parameter not detected at the stated detection limit.

Comments:

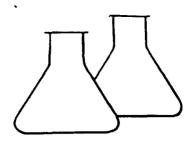
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Sullivan GC D1 Blow Pit

C4229

d'euren Analyst

Rev





5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615 • FAX: (505) 632-1865

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client:	Amoco	Project #:	92140
Sample ID:	2091	Date Reported:	05-06-94
Laboratory Number:	7358	Date Sampled:	05-05-94
Sample Matrix:	Water	Date Received:	05-06-94
Preservative:	HgCl and Cool	Date Analyzed:	05-06-94
Condition:	Cool and Intact	Analysis Requested:	BTEX

Concentration (ug/L)	Limit (ug/L)
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	
62	0.2
58	0.4
33.8	0.3
477	0.4
17.6	0.4
	(ug/L) 62 58 33.8 477

SURRO	GATE	RECO	VERIES:
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Parameter	Percent Recovery
Trifluorotoluene	96 %
Bromofluorobenzene	100 %

Method: Method 5030A, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992

> Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986

ND - Parameter not detected at the stated detection limit.

Comments:

Sullivan GC D1 Blow Pit C4229

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Review

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Form 3160-5 June 1990)	DEPARTMENT	D STATES OF THE INTERIOR ND MANAGEMENT	FORM APPROVED Budget Bureau No. 1004-0135 Expires: March 31, 1993 5. Lease Designation and Serial No.
SUNDRY NOTICES AND REPORTS ON WELLS		Fer # 94000209	
	orm for proposals to drill	or to deepen or reentry to a different reservoir. PERMIT—" for such proposals	6. If Indian, Allottee or Tribe Name
SUBMIT IN TRIPLICATE		7. If Unit or CA, Agreement Designation COM. AGMT. # SW 209	
1. Type of Well  - Oil Well Gas Other  2. Name of Operator		8. Weil Name and No. SULLUTAN GC D # (	
Amoco Production Company		9. API Weil No.	
3. Address and Telephone No. 200 Amoco Court, Farmington, N.M. 87401 Tel: (505) 326-9200		3004507733 10. Field and Pool, or Exploratory Area	
	ge, Sec., T., R., M., or Survey Descr E S. 26 , 729		DATCO TA 11. County or Parish, State SAN JUAN, N.M.
2. CHECK	APPROPRIATE BOX(s)	TO INDICATE NATURE OF NOTICE, REPOR	RT, OR OTHER DATA
TYPE OF	TYPE OF SUBMISSION TYPE OF ACTION		
Notice o		Abandonment Recompletion Plugging Back Casing Repair	Change of Plans  Kew Construction  Non-Routine Fracturing  Water Shut-Off
. Final Al	bandonment Notice	Altering Casing	Conversion to Injection
		rtinent details, and give pertinent dates, including estimated date of starting	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	Stother Pit cleans	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	rtinent details, and give pertinent dates, including estimated date of starting lepths for all markers and zones pertinent to this work.)*	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	rtinent details, and give pertinent dates, including estimated date of starting lepths for all markers and zones pertinent to this work.)*	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	rtinent details, and give pertinent dates, including estimated date of starting lepths for all markers and zones pertinent to this work.)*	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	rtinent details, and give pertinent dates, including estimated date of starting lepths for all markers and zones pertinent to this work.)*	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical o	rtinent details, and give pertinent dates, including estimated date of starting lepths for all markers and zones pertinent to this work.)*	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form
give subsurface loca	ations and measured and true vertical of closure verificati closure verificati	Trinent details, and give pertinent dates, including estimated date of starting hepths for all markers and zones pertinent to this work.)* .on - see attached documentation.	Dispose Water (Note: Report results of multiple completion on W Completion or Recompletion Report and Log form

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### GENERAL INSTRUCTIONS

his form is designed for submitting proposals to perform certain well opertions, and reports of such operations when completed, as indicated, on ederal and Indian lands pursuant to applicable Federal law and regulaons, and, if approved or accepted by any State, on all lands in such State, ursuant to applicable State law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area, or regional procedures and practices, either are shown below or will be issued by, or may be obtained from, the local Federal and/or State office.

#### SPECIFIC INSTRUCTIONS

em 4—If there are no applicable State requirements, locations on Federal r Ibdian land should be described in accordance with Federal requirements. onsult local State or Federal office for specific instructions.

em 13—Proposals to abandon a well and subsequent reports of abandontent should include such special information as is required by local Federand/or State offices. In addition, such proposals and reports should include easons for the abandonment; data on any former or present productive zones, or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs, mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to top of any left in the hole; method of closing top of well; and date well site conditioned for final inspection looking to approval of the abandonment.

#### NOTICE

The Privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et. seq., 351 et. seq., 25 U.S.C. et. seq.; 43 CFR 3160.

PRINCIPAL PURPOSE — The information is to be used to evaluate, when appropriate, approve applications, and report completion of secondary well operations, on a Federal or Indian lease.

#### ROUTINE USES:

- (1) Evaluate the equipment and procedures used during the proposed or completed subsequent well operations.
- (2) Request and grant approval to perform those actions covered by 43 CFR 3162.3-2(2).
- (3) Analyze future applications to drill or modify operations in light of data obtained and methods used.
- (4)(5) Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions.

EFFECT OF NOT PROVIDING INFORMATION — Filing of this notice and report and disclosure of the information is mandatory once an oil or gas well is drilled.

The Paperwork Reduction Act of 1980 (44 U.S.C. 3501, et. seq.) requires us to inform you that:

This information is being collected in order to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

This information will be used to report subsequent operations once work is completed and when requested, to obtain approval for subsequent operations not previously authorized.

Response to this request is mandatory for the specific types of activities specified in 43 CFR Part 3160.

#### BURDEN HOURS STATEMENT

Public reporting burden for this form is estimated to average 25 minutes per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management, (Alternate) Bureau Clearance Officer, (WO-771), 18 and C Streets, N.W., Washington, D.C. 20240, and the Office of Management and Budget, Paperwork Reduction Project (1004-0135), Washington, D.C. 20503.

