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GENERAL CORRESPONDENCE

YEAR(S): 1996-1995

	Tierra Environmental Corporation					
CORPORATE OFFICE 907 W. Apache Farmington, NM 87401 505-325-0924	FAX COVER SHEET					
	DATE 01-25-96 PAGE 1 OF 2					
	FROM Told Nobis					
	PHONE 505-334-8894 FAX 334-9024					
	TO <u>Bill olse OCA</u> FAX <u>535-827-8177</u>					
	SUBJECT / NOTE(S): Let's Try This on y					
	Thanks					
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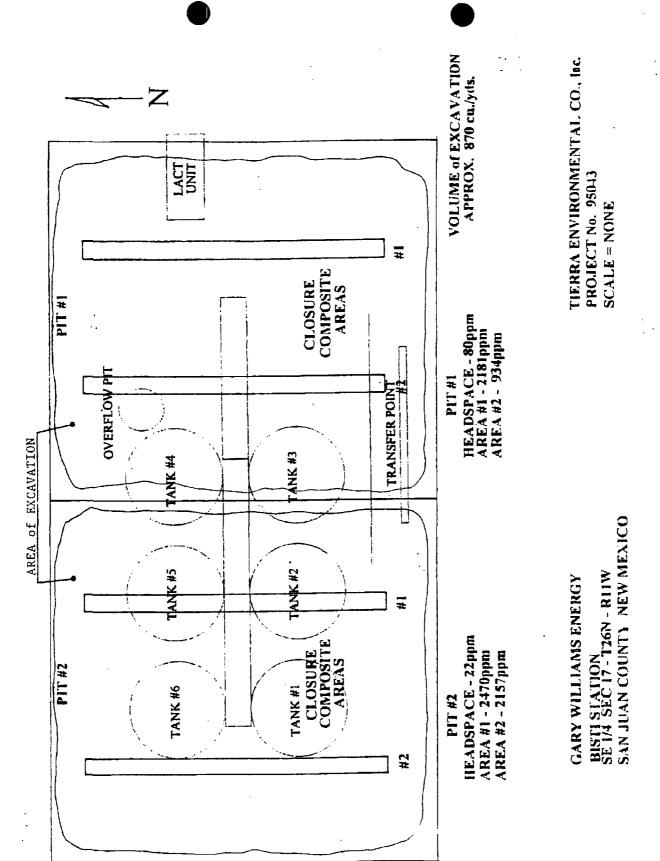
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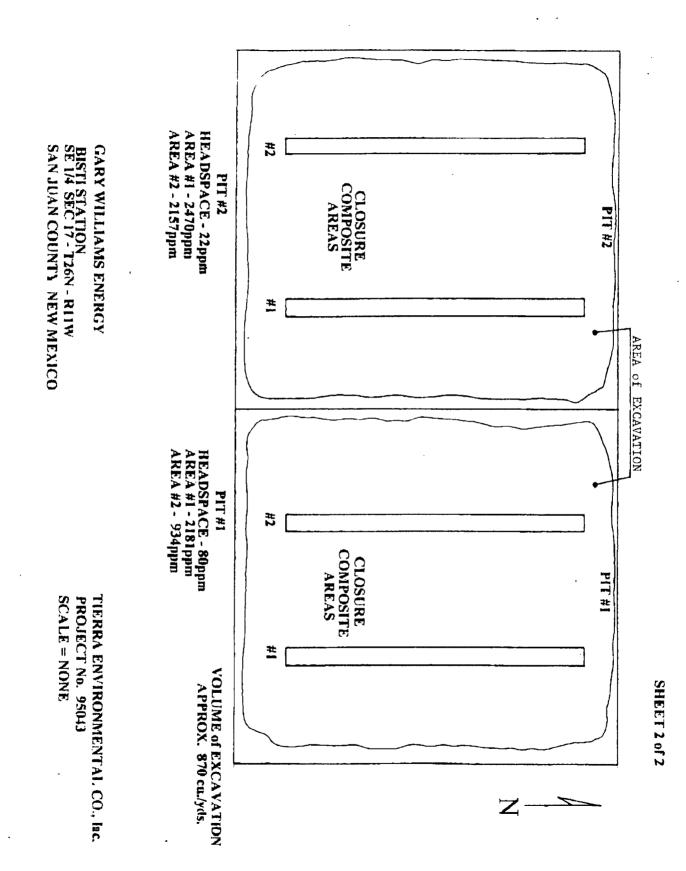
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CORPORATE OFFICE 907 W. Apache Farmington, NM 87401 505-325-0924	FAX COVER SHEET					
	DATE 01.25-5C PAGE 1 OF ROM TOUS Nob.5 PHONE 505-334-8854 FAX 505-334-5024					
	TO <u>Bill olsen OCN</u> FAX <u>505-807-8127</u>					
	SUBJECT / NOTE(S): Here is the Amended Digram for the Bisti prosect. Sorry Apout the Quality of the other					
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Telephone Personal	Time 1530	>	Oate	1/23/96	
Originating Party	Other Parties				
Bill Olson - Envir. Bhr	Phil Nobis - Tierry Environment				
Subject			······································		
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TIERRA ENVIRONMENTAL COMPANY Inc. P.O. DRAWER 15250 FARMINGTON, NM 87401

December 8, 1995

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

VATION DIVISIO

RE: REQUEST FOR CLOSURE, BISTI STATION, Southeast 1/4, Section 17, R-11W, approximately ten miles south of Bloomfield on Hwy. 44 and ten miles west on the Chaco Plant Road in San Juan County New Mexico, operated by Gary Williams Energy, TECI Project #.95043.

Dear Mr. Olsen:

Enclosed herewith please find the complete report on voluntary cleanup activities conducted at Bisti Station by Tierra Environmental Company, Inc. on behalf of our client Gary Williams Energy.

As was the case with Apache Station, the cleanup activities were conducted at the site as part of a sale of property agreement between Giant Refining and Gary.

When you visited the site last month, we discussed the issue of depth to groundwater. I did as you had suggested and reviewed the adjacent El Paso Chaco Plant information on file with the OCD office in Aztec. It appears that near the plant's impoundment's east of the Bisti Station that ground water was encountered in the monitor wells at a depth of about 35 feet. However after further reviewing the file I found a 1992 report concerning the placement of cathodic protection on the west property boundary, some distance further west of the location of the monitor wells. In 1992, El Paso drilled three deep well ground beds to a depth of 505 feet. The drillers log's indicated that no water was encountered until a depth of 120 feet was reached. The report went on to say that at least fifty feet of unsaturated low permeability shale is present above the aquifer.

After my review of the Chaco Plant file I studied the topography of the area. The monitor well reports indicated that the shallow ground water encountered at 35 feet showed a directional flow of from southwest to northeast, moving away from the Bisti Station. NAAPI has completed an expansion south of the Chaco Plant. The expansion ends near the west border of plant but does not extend towards the Bisti Station. I would have to assume that the groundwater encountered in the monitor wells is as a result of the NAAPI expansion irrigation and quite possibly migration from El Paso's own impoundments. There is a draw that runs southwest to northeast from the expansion that separates the Chaco Plant and the NAAPI expansion from the Bisti Station.

During excavation of the Bisti Station Site, the average depth reached was approximately 15 feet. However at one point near the old lact unit we had removed at the east end of the site, excavation reached a depth of about 25 feet. At that level a blue clay / shale layer was encountered that appeared to be impermeable. There was no water present. That layer is most likely the same one identified in the El Paso project drillers log from Unit 296-6 that was encountered at 30 feet. The BLM topographic map indicates that the Chaco Plant and the impoundments being monitored thereupon are somewhat higher in elevation than the Bisti Station. Therefore it is logical to asume that if no water was encountered at Bisti Station, what ever water might be present in the monitor wells at 30 to 35 feet is confined to the area near the plant and is isolated from the Bisti Station. The Bisti Station project.

Based on the preceding information, the site assessment conducted by Todd Nobis of the Bisti Station site, concluded that location should qualify for closure pursuant to OCD Regulations at 5,000 ppm TPH or less. Therefore on behalf of our client Gary Williams Energy, I respectfully request that the Bisti Station Site be considered for final closure under those parameters based on our enclosed final report.

Please call me if you have any questions or require additional information.

Thank you for your professional assistance and cooperation in this matter.

Sincerely,

Confil Phillip C. Nobis

President

xc: Chris Hawley, GWE D. Foust, OCD Aztec Final Report