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APPROVALS

YEAR(S):

1995

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505

November 30, 1995

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-518

Mr. Barry A. Schatz
Marathon Oil Company
P.O. Box 552
Midland, Texas 79702-0552

RE: SAN JUAN BASIN GROUND WATER INVESTIGATION WORK PLAN

Dear Mr. Schatz:

The New Mexico Oil Conservation Division (OCD) has completed a review of Marathon Oil Company's (MOC) November 28, 1995 correspondence. This document contains MOC's work plan for investigation and remediation of contaminated ground related to the former use of unlined pits in the San Juan Basin of Northwestern New Mexico.

The above referenced work plan is approved with the following conditions:

1. Monitor wells will be constructed as set out below:
 - a. A minimum of fifteen feet of well screen will be installed, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
 - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug will be placed above the gravel pack.
 - d. The remainder of the hole will be grouted to the surface with cement containing 5 % bentonite.
2. MOC will develop each well upon completion using EPA approved procedures.
3. MOC will conduct all sampling and analysis activities using EPA approved procedures.

4. All ground water samples will be analyzed for benzene, toluene, ethylbenzene, xylene (BTEX) and major cations and anions. If a product sheen is present, ground water samples will also be analyzed for polynuclear aromatic hydrocarbons (PAH).

NOTE: The OCD does not require that MOC analyze subsequent ground water samples for cations and anions and PAH's if initial sample analytical results show that these contaminants are not present in excess of WQCC standards.

5. The OCD will not consider ground water actions at a site to be terminated unless all ground water contaminant concentrations are either below WQCC standards or below background levels.
6. The OCD defers comment on the application of standards in the event of future changes in New Mexico Water Quality Control Commission (WQCC) ground water standards
7. All wastes generated will be disposed of at an OCD approved facility or in an OCD approved manner.
8. MOC will submit an annual report on investigation/remedial activities to the OCD by October 1 of each respective year. The reports will present the information on each site as a separate case. Each case will contain:
 - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
 - b. The laboratory analytic results of soil and water sampling.
 - c. A site map and a water table elevation map using the water table elevation of the ground water in all monitor wells.
 - d. A geologic log and completion diagram for each well.
 - e. The disposition of all wastes generated.
9. MOC will notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
10. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec Office.

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Will C. Olson".

William C. Olson
Hydrogeologist
Environmental Bureau

cc: Denny Foust, OCD Aztec District Office
Ray Powell, NM State Land Commissioner
Bill Liess, BLM Farmington District