

3R - 277

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2003-1995

## Olson, William

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**From:** Peacock, Paul [MPPeacock@MarathonOil.com]  
**Sent:** Thursday, May 01, 2003 8:31 AM  
**To:** William C Olson (E-mail)  
**Cc:** Nina Hutton (E-mail)  
**Subject:** NMOCD Letter - Ohio C #3 Site.PDF



NMOCD Letter -  
Ohio C #3 Site....



Nina Hutton

Bill,

I received your attached letter concerning the Ohio "C" Government #3 Site. Marathon sold this facility to XTO Energy on July 1, 2002. Please forward all future correspondence for this site to Nina Hutton with XTO Energy at the address listed in the attachment.

M. Paul Peacock  
Marathon Oil Company  
Southern Business Unit  
Senior HES Professional  
Phone: 432-687-8140



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

January 4, 2002

**CERTIFIED MAIL**

**RETURN RECEIPT NO: 7000-1670-0012-5357-8161**

Mr. Paul Peacock  
Marathon Oil Company  
P.O. Box 552  
Midland, Texas 79702-0552

**RE: CASE #3R0277  
OHIO "C" GOVERNMENT #3 WELL SITE  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Peacock:

The New Mexico Oil Conservation Division (OCD) has reviewed Marathon Oil Company's (MOC) June 26, 2001 "OHIO "C" GOVERNMENT WELL #3 SITE, SECTION 26, T28N, R11W, SAN JUAN COUNTY, NEW MEXICO, CLOSURE REQUEST REPORT". This document contains the results of MOC's remediation and monitoring of ground water contamination at MOC's Ohio "C" Government #3 well site in Unit P of Section 26, Township 28 North, Range 11 West, San Juan County, New Mexico. The document also requests closure of the remediation and monitoring actions at the site.

A review of the documents related to this site shows that ground water in monitor well MW-5 is still contaminated in excess of the New Mexico Water Quality Control Commission (WQCC) standards. Therefore, the OCD cannot issue final closure approval at this time. The OCD requires that MOC continue to remediate and monitor the site according to their previously approved work plans. The OCD requests that MOC coordinate their activities with the ground water remedial actions being taken by El Paso Field Services (EPFS) at their adjacent dehydration pit, since MOC's contaminant plume is commingled with that of EPFS. The OCD will consider issuing final closure approval once ground water from all site monitoring wells is below WQCC standards for a minimum of 4 consecutive quarters

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

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

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Bill Liess, BLM Farmington District Office  
Scott T. Pope, El Paso Field Services



P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

JUN 29 2001

June 26<sup>th</sup>, 2001

**Mr. William Olson**  
Oil Conservation Division  
New Mexico Energy, Minerals and Natural Resources Department  
1220 S. Saint Francis Drive  
Santa Fe, NM 87504

Re: **Ohio "C" Government Well #3 Site**  
Section 26, T28N, R11W  
San Juan County, New Mexico  
Closure Request Report

CERTIFIED MAIL: P 245 774 617

Dear Mr. Olson:

Please find enclosed a Closure Request Report for the above referenced project. This report documents that the prior removal of source materials and natural attenuation have reduced groundwater benzene levels to the point at which we believe that closure is justified. We thus submit this closure request for your consideration.

Please be advised that I have accepted a transfer with Marathon to Findlay, Ohio. Paul Peacock, of our office, will again be assuming responsibility for this project. You should therefore address all subsequent correspondence to his attention.

Thank you.

Sincerely,

  
**L. Peter Galusky, Jr.**  
HES Professional

Enclosure as noted.



P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

November 24, 1998

Sandra D. Miller  
Superintendent, Environmental Compliance  
El Paso Field Services  
P. O. Box 4990  
Farmington, NM 87499

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ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

RE: Ohio "C" Government #3 Well Site  
San Juan County, New Mexico

Dear Sandra,

This correspondence is intended to reiterate what El Paso Field Services (EPFS) and Marathon Oil Company (MOC) agreed to regarding future actions at the Ohio "C" Government #3 facility. This agreement was achieved in a meeting held on November 5, 1998, the attendees of which were G. W. Donaghey, S. D. Miller, M. P. Peacock, and J. L. Vierzbicki.

MOC has agreed to manage and pay for the installation of three to four monitoring wells at the location and conduct an intrinsic bioremediation study incorporating data collected from EPFS's MW-1. EPFS has agreed to arrange and pay for a survey of the monitoring wells following installation, and conducting sampling and subsequent analysis of groundwater from all monitoring wells once every six months. Analysis will be for the following constituents: benzene, toluene, ethyl benzene, xylene, major cations and anions, and, if a product sheen is present, polynuclear aromatic hydrocarbons (PAH's).

MOC will install monitoring wells some time in 1999 and inform EPFS of this activity so that survey work may be arranged for and biannual monitoring initiated. A progress report on the project will be submitted to the New Mexico Oil Conservation Division in EPFS's annual report on behalf of MOC, as it is submitted earlier in the year than MOC's.

If there are any concerns with MOC's recollection of the outcome of this meeting, please contact Jenelle Vierzbicki at (915)687-8306.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Jenelle Vierzbicki'.

Jenelle L. Vierzbicki, CSP  
Environmental and Safety Specialist

cc: W. C. Olson - NMOCD, Santa Fe  
D. Foust - NMOCD, Aztec  
G. W. Donaghey

M. P. Peacock  
F. D. Searle

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P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

September 14, 1998

007 - 7 1998

William C. Olson, Hydrologist  
New Mexico Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Re: Ohio "C" Government #3 Well Site  
San Juan County, New Mexico

Dear Mr. Olson,

This correspondence is being submitted by Marathon Oil Company in response to the Oil Conservation Division's (OCD) letter of July 9, 1998, requiring a status report on activities conducted at the above-referenced location.

Below is a list of the activities currently in progress or completed:

#### **Assessment Plan**

A conceptual assessment plan has been developed. Due to the mixing of plumes with contamination from an adjacent pit that was operated by El Paso Field Services, Marathon Oil Company plans to coordinate the assessment work with them. In addition, we plan to use the information collected during their assessment in 1996. Bids have been received from sampling contractors for the assessment work.

Marathon anticipates that assessment work will occur yet this autumn. Information collected from this work will be disclosed in a later status report.

#### **Archeological Survey**

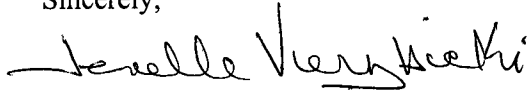
A contractor is being secured to perform the archeological surveys that are necessary to land use permits from other regulatory agencies. It has been difficult scheduling the archeological survey due to the limited number of qualified contractors.

#### **Pit Closure**

The pit associated with this site has been backfilled with landfarm soils that had been remediated to OCD standards.

If you have any questions or concerns regarding this project, please contact me at (915)687-8306. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, reading "Jenelle Vierzbicki". The signature is fluid and cursive, with the first name "Jenelle" and last name "Vierzbicki" clearly distinguishable.

Jenelle L. Vierzbicki, CSP  
Environmental and Safety Specialist

cc: G. W. Donaghey  
G. D. Muse  
F. D. Searle

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Marathon  
Oil Company

Mid-Continent Region  
Production United States  
HES Department  
P. O. Box 552  
Midland, Texas 79702  
Telephone 915/682-1626

### PANAFAX TRANSMITTAL SHEET

SEND THE FOLLOWING PAGES TO:

NAME: Bill Olson

COMPANY NAME: New Mexico Oil Conservation Division

LOCATION: Santa Fe

PANAFAX NUMBER: (505) 827-8177

FROM:

NAME: Jenelle Vierzbicki EXT. <sup>915</sup>687-8306

TOTAL NUMBER OF PAGES: 3 (Including cover sheet)

IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL BACK ASAP

PHONE: 915 687-8306

COMMENTS: Hard Copy to follow - JLV

Mid-Continent Region  
Production United States



P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

September 14, 1998

William C. Olson, Hydrologist  
New Mexico Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Re: Ohio "C" Government #3 Well Site  
San Juan County, New Mexico

Dear Mr. Olson,

This correspondence is being submitted by Marathon Oil Company in response to the Oil Conservation Division's (OCD) letter of July 9, 1998, requiring a status report on activities conducted at the above-referenced location.

Below is a list of the activities currently in progress or completed:

#### **Assessment Plan**

A conceptual assessment plan has been developed. Due to the mixing of plumes with contamination from an adjacent pit that was operated by El Paso Field Services, Marathon Oil Company plans to coordinate the assessment work with them. In addition, we plan to use the information collected during their assessment in 1996. Bids have been received from sampling contractors for the assessment work.

Marathon anticipates that assessment work will occur yet this autumn. Information collected from this work will be disclosed in a later status report.

#### **Archeological Survey**

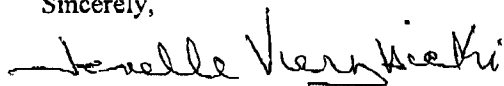
A contractor is being secured to perform the archeological surveys that are necessary to land use permits from other regulatory agencies. It has been difficult scheduling the archeological survey due to the limited number of qualified contractors.

#### **Pit Closure**

The pit associated with this site has been backfilled with landfarm soils that had been remediated to OCD standards.

If you have any questions or concerns regarding this project, please contact me at (915)687-8306. Thank you for your assistance.

Sincerely,



Jenelle L. Vierzbicki, CSP  
Environmental and Safety Specialist

cc: G. W. Donaghey  
G. D. Muse  
F. D. Searle

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P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

August 17, 1998

William C. Olson, Hydrologist  
New Mexico Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Re: Ohio "C" Government #3 Well Site  
San Juan County, New Mexico

Dear Mr. Olson,

Marathon Oil Company is submitting this correspondence as a confirmation of our conversation conducted on Monday, August 17, 1998 regarding an extension in submitting a status report on groundwater remediation and monitoring activities at the above-referenced lease. Pursuant to our conversation, Marathon will provide the requested information by Monday, October 5, 1998.

Marathon intends to conduct additional fieldwork, the findings of which we would like to include in the requested report. An archeological survey of the area over which an investigation is to be conducted and subsequent approvals are still being sought, after which this work will commence.

If you have questions regarding this correspondence, please contact me at (915)687-8306.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Jenelle L. Vierzbicki'.

Jenelle L. Vierzbicki, CSP  
Environmental and Safety Specialist

cc: G. W. Donaghey  
F. D. Searle

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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

July 9, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-306**

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

**RE: OHIO "C" GOVERNMENT #3 WELL SITE  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Schatz:

The New Mexico Oil Conservation Division's (OCD) November 30, 1995 approval of Marathon Oil Company's (MOC) San Juan Basin Ground Water Investigation Work Plan required that MOC submit an annual report on investigation and remedial activities at all MOC ground water sites to the OCD by October 1 of each year. A review of OCD files shows that the OCD has not received any information since 1995 regarding ground water remediation and monitoring activities at MOC's Ohio "C" Government #3 well site located in Unit P, Section 26, T28N, R11W or any other site. In addition, information in El Paso Field Services (EPFS) recent annual ground water monitoring report shows an apparent commingling of contaminated waters from EPFS's former unlined dehy pit and MOC's former unlined production pit.

Therefore, the OCD requests that MOC cooperate with EPFS to investigate and remediate ground water contamination at the Ohio "C" Government #3 well site. The OCD also requires that MOC submit the previously required annual reports for the San Juan Basin which contain all of the investigation and remediation information required in the OCD's November 30, 1995 approval of MOC's San Juan Basin Ground Water Investigation Work Plan. The reports will be submitted to the OCD Santa Fe Office by September 4, 1998 with a copy provided to the OCD Aztec District Office.

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

Sincerely,

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

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Sandra D. Miller, El Paso Field Services

**NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**

**OIL CONSERVATION DIVISION**

2040 S. Pacheco  
Santa Fe, New Mexico 87505

October 18, 1995

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-426**

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

**RE: OHIO "C" GOVERNMENT #3 WELL SITE**

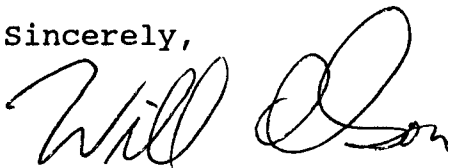
Dear Mr. Schatz:

The New Mexico Oil Conservation Division (OCD) has reviewed Marathon Oil Company's (MOC) undated correspondence which was received by the OCD on September 18, 1995. This document contains MOC's notification of the discovery of ground water contamination during pit closure actions at the Ohio "C" Government #3 well site located in Sec. 26, T28N, R11W, 1090'FSL, 990'FEL, NMPM, San Juan County, New Mexico.

Based upon a review of the above referenced document, the OCD requests that MOC submit an investigation work plan to the OCD by December 18, 1995. The investigation work plan will contain MOC's plan for determining the extent of contamination related to MOC's activities at the site.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec Office  
Michael J. Pool, BLM Farmington District Manager

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Mid-Continent Region  
Production United States

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**Marathon  
Oil Company**

P.O. Box 552  
Midland, TX 79702-0552  
Telephone 915/682-1626

Bill Olsen  
New Mexico Oil Conservation Division  
2040 So. Pacheco St.  
Santa Fe, New Mexico 87505

Dear Mr. Olsen:

This letter is written notification that follows our telephone conversation last week informing the NMOCDD that ground water contamination was discovered during pit closure activity at the Ohio Government "C" well #3, located in Kutz Canyon, San Juan County, New Mexico. Attached is a copy of test results of a ground water sample taken from a pit at the wellsite. The sample contains 104 ug/L of benzene, above the 10 ug/l regulatory level for this constituent. A legal description of the well site is listed below.

Ohio "C" Government #3, Sec. 26, T28N, R11W, 1090'FSL, 990' FEL.

If you have any questions or need additional information please contact me in Midland at (915) 687-8308.

Sincerely,

*Barry Schatz*  
Barry Schatz

cc: Denny Foust  
New Mexico Oil Conservation Division  
1000 Rio Brazos Rd.  
Aztec, New Mexico 87410

C.K. Curlee  
L.J. Oswald  
T.A. Deines  
D.S. Wilkins  
J.S. Hodges  
File: 536-12

**ENVIROTECH LABS****PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA METHOD 8020  
AROMATIC VOLATILE ORGANICS**

Client: Marathon Oil  
 Sample ID: Ohio 'C' Govt #3  
 Chain of Custody: 4347  
 Laboratory Number: 8817  
 Sample Matrix: Water  
 Preservative: HgCl & Cool  
 Condition: Cool & Intact

Project #: 95047  
 Date Reported: 08-18-95  
 Date Sampled: 08-17-95  
 Date Received: 08-17-95  
 Date Analyzed: 08-18-95  
 Analysis Requested: BTEX

Parameter	Concentration (ug/L)	Dilution Factor	Det. Limit (ug/L)
Benzene	104	1	0.4
Toluene	199	1	0.5
Ethylbenzene	23.6	1	0.5
p,m-Xylene	375	1	0.4
o-Xylene	64.9	1	0.4


ND - Parameter not detected at the stated detection limit.


Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	96 %
	Bromofluorobenzene	100 %

References: Method 5030, 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. 1994.

**Comments:**

  
 Analyst

  
 Review



# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

● A METHOD 418.1  
TOTAL PETROLEUM  
HYDROCARBONS

COPY

Client:	Marathon Oil	Project #:	95047
Sample ID:	Ohio 'C' Govt. #3 @ 16'	Date Reported:	08-18-95
Laboratory Number:	8812	Date Sampled:	08-17-95
Chain of Custody No:	4345	Date Received:	08-17-95
Sample Matrix:	Soil	Date Extracted:	08-17-95
Preservative:	Cool	Date Analyzed:	08-18-95
Condition:	Cool and Intact	Analysis Needed:	TPH

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	13	10

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments:

Analyst

Review