

AP - 25

APPROVALS

YEAR(S):

2002-1998



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Carol Leach
Acting Cabinet Secretary

Lori Wrotenberg
Director
Oil Conservation Division

February 1, 2002

CERTIFIED MAIL

RETURN RECEIPT NO: 7001-1940-0004-3929-7105

Ms. Lisa Norton
Yates Petroleum Corporation
105 South Fourth St.
Artesia, New Mexico 88210

**RE: STAGE 1 ABATEMENT PLAN PROPOSALS
WILLIAMS PIT SITE (AP-22)
LATTION PIT SITE (AP-23)
INEX PIT SITE (AP-24)
SCRIPP PIT SITE (AP-25)**

Dear Ms. Norton:

The New Mexico Oil Conservation Division (OCD) has reviewed the following Yates Petroleum Corporation (Yates) documents:

- October 19, 2001 "STAGE 1 ABATEMENT PLANS, WILLIAMS PIT SITE (AP-22), LATTION PIT SITE (AP-23), INEX PIT SITE (AP-24), SCRIPP PIT SITE, (AP-25)".
- July 3, 2001 "TRANSMITTAL OF STAGE 1 ABATEMENT PLAN PROPOSALS, ABATEMENT PLAN AP-25 SCRIPP PIT SITE, ABATEMENT PLAN AP-24 INEX PIT SITE, ABATEMENT PLAN AP-23 LATTION PIT SITE, ABATEMENT PLAN AP-22 WILLIAMS PIT SITE".
- July 2, 2001 "STAGE 1 ABATEMENT PLAN PROPOSAL, ABATEMENT PLAN AP-22, WILLIAMS PIT SITE, EDDY COUNTY, NEW MEXICO".
- July 2, 2001 "STAGE 1 ABATEMENT PLAN PROPOSAL, ABATEMENT PLAN AP-23, LATTION PIT SITE, EDDY COUNTY, NEW MEXICO".
- July 2, 2001 "STAGE 1 ABATEMENT PLAN PROPOSAL, ABATEMENT PLAN AP-24, INEX PIT SITE, EDDY COUNTY, NEW MEXICO".
- July 2, 2001 "STAGE 1 ABATEMENT PLAN PROPOSAL, ABATEMENT PLAN AP-25, SCRIPP PIT SITE, EDDY COUNTY, NEW MEXICO".

These documents contain Yates' proposed Stage 1 abatement plan proposals and proof of public notice for investigation of the extent of contamination related to former unlined pits at Yates' Williams Pit Site located in Unit C, Section 25, Township 18 South, Range 26 East, Eddy County, New Mexico; the Lattion Pit Site located in Unit K, Section 23, Township 18 South, Range 26 East, Eddy County, New Mexico; the Inex Pit Site located in Unit F, Section 26, Township 18 South, Range 26 East, Eddy County and; the Scripps Pit Site located in Unit L, Section 25, Township 18 South, Range 26 East, Eddy County, New Mexico.

The Stage 1 Abatement Plans for the Williams, Lattion, Inex and Scripps pit sites, as contained in the above-referenced documents, are approved with the following conditions:

1. Ground water from all site monitor wells shall be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene and xylene (BTEX); major cations and anions; and, New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods and quality assurance/quality control procedures.
2. All wastes generated shall be disposed of at an OCD approved facility or in an OCD approved manner.
3. Yates shall submit a Stage 1 investigation report for each site to the OCD Santa Fe Office by April 1, 2002. Please provide a copy of all documents to the OCD Artesia District Office.
4. Yates shall 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 split samples.

Please be advised that OCD approval does not relieve Yates of responsibility if the Stage 1 abatement plan fails to adequately determine the extent of contamination related to Yates' facilities. In addition, OCD approval does not relieve Yates of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact Bill Olson of my staff at (505) 476-3491.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/wco

cc: Tim Gum, OCD Artesia District Office
Jeffrey D. Minchak, Harding ESE, Inc.
B.R. Wilson

COPY

June 11, 1998

CERTIFIED MAIL
RETURN RECEIPT NO: Z-235-437-289

Ms. Lisa Norton
Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210

RE: PIT CLOSURE PLAN

Dear Ms. Norton:

The New Mexico Oil Conservation Division (OCD) has reviewed Yates Petroleum Corporation's (Yates) undated "PIT CLOSURE" correspondence which was received by the OCD on March 13, 1998. This document contains Yates's plan for closure of unlined oil and gas production pits at the following sites:

- | | | |
|---|----------------------------------|--------------------------|
| - | Inex Tank Battery | NE/4, Sec 26, T18S, R26E |
| - | Lattion Tank Battery | SE/4, Sec 23, T18S, R26E |
| - | Scripps Tank Battery | SW/4, Sec 25, T18S, R26E |
| - | Williams Tank Battery | NE/4, Sec 25, T18S, R26E |
| - | Santa Fe Land Improvement #1 SWD | SE/4, Sec 17, T19S, R26E |

The above referenced pit closure plan **is approved with the following conditions:**

1. During the pit closures, Yates will determine the vertical extent of soil contamination at each pit site.
2. All soil samples for verification of completion of remedial activities including the vertical and horizontal extent of contamination will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene, (BTEX), total petroleum hydrocarbons (TPH) and chloride in accordance with the OCD's "SURFACE IMPOUNDMENT CLOSURE GUIDELINES".
3. Yates will notify the Environmental Bureau Chief of the OCD Santa Fe Office and the OCD Artesia District Office within 24 hours of the discovery of ground water contamination related to any pit closure activity.

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4. For each pit closed, upon completion of all closure activities, Yates will submit to the OCD for approval a completed OCD "PIT REMEDIATION AND CLOSURE REPORT" form (enclosed) which will contain the final results of all pit closure and soil remediation activities. The report will include the concentrations and application rates of all materials or additives used to enhance bioremediation of contaminants, the final concentrations of any landfarmed or insitu bioremediated soils and the disposition of all wastes removed from the site. To simplify the approval process for both Yates and OCD, please submit the final pit closure reports **only** upon completion of all closure activities including completion of onsite landfarming or insitu bioremediation of contaminated soils.
5. By July 10, 1998, Yates will submit to the OCD for approval a tank installation or lined pit plan for the disposal system which will replace the former unlined pits.
6. All wastes removed from a specific site will be disposed of at an OCD approved facility.
7. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia Office.

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

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

Sincerely,

William C. Olson
Hydrologist
Environmental Bureau

Enclosure

xc: Tim Gum, OCD Artesia District Supervisor