

3R - 362

## APPROVALS

YEAR(S):

1998



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

June 17, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-296**

Mr. Mark Harvey  
Williams Field Services  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: SAN JUAN BASIN PIT CLOSURE REPORTS  
WILLIAMS FIELD SERVICES**

Dear Mr. Harvey:

The New Mexico Oil Conservation Division (OCD) has completed a review of Williams Field Services' (WFS) March 16, 1998 "PIT REMEDIATION AND CLOSURE REPORTS". This document contains the results of the closure of 38 unlined pits in the San Juan Basin.

The pit closure/soil remediation activities conducted at the sites listed on Attachment A are **approved**.

Please be advised that OCD approval does not relieve WFS of liability if remaining contaminants are found to pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve WFS of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Will Olson".

William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Mike Matush, NM State Land Office  
Bill Liess, BLM Farmington District Office  
Pat Hester, BLM Albuquerque Office

## ATTACHMENT A

### WFS SITES APPROVED FOR FINAL PIT CLOSURE

June 17, 1998

#### Well Name

#### Location

1.	Allison #22A (Dehy pit)	Unit C, Sec. 25, T32N, R07W
2.	Bixler #1 (Dehy pit)	Unit E, Sec. 26, T30N, R04W
3.	Carson #1 (Dehy pit)	Unit L, Sec. 01, T30N, R05W
4.	Minel Fed #3 (Dehy pit)	Unit M, Sec. 06, T25N, R03W
5.	NEBU #3R (Dehy pit)	Unit K, Sec. 05, T30N, R07W
6.	NEBU #26A (Dehy pit)	Unit D, Sec. 08, T30N, R07W
7.	NEBU #32A (Dehy pit)	Unit H, Sec. 07, T30N, R07W
8.	NEBU #44 (Dehy pit)	Unit B, Sec. 04, T30N, R07W
9.	NEBU #45A (Dehy pit)	Unit I, Sec. 05, T30N, R07W
10.	NEBU #73 (Dehy pit)	Unit L, Sec. 35, T31N, R07W
11.	NEBU #202 (Dehy pit)	Unit B, Sec. 11, T31N, R07W
12.	Rattlesnake Canyon #3 (Dehy pit)	Unit I, Sec. 20, T32N, R08W
13.	SJ 27-4 Unit #6 (Dehy pit)	Unit M, Sec. 31, T27N, R04W
14.	SJ 27-4 Unit #8 (Dehy pit)	Unit M, Sec. 32, T27N, R04W
15.	SJ 27-4 Unit #8 Lateral Line Drip (Drip pit)	Unit M, Sec. 32, T27N, R04W
16.	SJ 27-5 Unit #36 Comg #1 (Dehy pit)	Unit B, Sec. 36, T27N, R05W
17.	SJ 27-5 Unit #36 Comg #2 (Dehy pit)	Unit B, Sec. 36, T27N, R05W
18.	SJ 27-5 Unit #36 Comg #3 (Dehy pit)	Unit B, Sec. 36, T27N, R05W
19.	SJ 29-4 #7 (Dehy pit)	Unit E, Sec. 20, T29N, R04W
20.	SJ 29-6 #1 (Dehy pit)	Unit A, Sec. 03, T29N, R06W
21.	SJ 29-6 #15 (Dehy pit)	Unit K, Sec. 02, T29N, R06W
22.	SJ 30-4 #20 (Dehy pit)	Unit O, Sec. 22, T30N, R04W
23.	SJ 30-5 #7 MV (Dehy pit)	Unit M, Sec. 29, T30N, R05W
24.	SJ 30-5 #13 (Dehy pit)	Unit B, Sec. 16, T30N, R05W
25.	SJ 30-5 #51 (Dehy pit)	Unit B, Sec. 21, T30N, R05W
26.	SJ 30-5 #53 DK (Dehy pit)	Unit L, Sec. 16, T30N, R05W
27.	SJ 30-5 #61 (Dehy pit)	Unit A, Sec. 15, T30N, R05W
28.	SJ 30-6 #28A (Dehy pit)	Unit J, Sec. 33, T30N, R06W
29.	SJ 30-6 #34 (Dehy pit)	Unit M, Sec. 10, T30N, R06W
30.	SJ 32-7 #29A (Dehy pit)	Unit A, Sec. 18, T32N, R07W
31.	SJ 32-7 #30 (Dehy pit)	Unit B, Sec. 21, T32N, R07W
32.	SJ 32-7 #39 DK (Dehy pit)	Unit K, Sec. 23, T32N, R07W
33.	SJ 32-8 #40 (Dehy pit)	Unit M, Sec. 33, T32N, R08W
34.	Schalk 49-2 (Dehy pit)	Unit O, Sec. 23, T30N, R04W
35.	Schalk 49-4 (Dehy pit)	Unit D, Sec. 23, T30N, R04W
36.	Schalk 55 #1 (Dehy pit)	Unit A, Sec. 03, T30N, R05W
37.	Schalk #57 2A (Dehy pit)	Unit C, Sec. 12, T30N, R05W
38.	Wilmer Canyon #1 (Dehy pit)	Unit M, Sec. 24, T32N, R08W



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 24, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-262**

Mr. Mark Harvey  
Williams Field Services  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: SAN JUAN BASIN PIT CLOSURE REPORTS  
WILLIAMS FIELD SERVICES**

Dear Mr. Harvey:

The New Mexico Oil Conservation Division (OCD) has completed a review of Williams Field Services (WFS) January 20, 1998 "PIT CLOSURE FORMS". This document contains the results of WFS's closure of 37 unlined pits in the San Juan Basin.

The OCD's review of the above referenced document is addressed in the following sections:

- A. The pit remedial activities conducted at the sites listed below are **approved**. Please be advised that OCD approval does not relieve WFS of liability if remaining contaminants pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve WFS of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

- |   |                              |
|---|------------------------------|
| 1. San Juan 27-4 Unit #4 (Dehy pit)       | Unit A, Sec. 31, T27N, R04W. |
| 2. San Juan 27-4 Unit #23 PC (Dehy pit)   | Unit M, Sec. 19, T27N, R04W. |
| 3. San Juan 27-5 Unit #4 MV (Dehy pit)    | Unit A, Sec. 29, T27N, R05W. |
| 4. San Juan 27-5 Unit #17 (Dehy pit)      | Unit M, Sec. 29, T27N, R05W. |
| 5. San Juan 27-5 Unit #71 PC (Dehy pit)   | Unit A, Sec. 28, T27N, R05W. |
| 6. San Juan 27-5 Unit #84 NP (Dehy pit)   | Unit N, Sec. 03, T27N, R05W. |
| 7. San Juan 27-5 Unit #116 (Dehy pit)     | Unit A, Sec. 24, T27N, R05W. |
| 8. San Juan 28-5 Unit #38A MV (Dehy pit)  | Unit O, Sec. 32, T28N, R05W. |
| 9. San Juan 28-6 Unit #94A PC (Dehy pit)  | Unit P, Sec. 36, T28N, R06W. |
| 10. San Juan 28-6 Unit #105 (Dehy pit)    | Unit N, Sec. 35, T28N, R06W. |
| 11. San Juan 29-5 Unit #25 (Dehy pit)     | Unit G, Sec. 18, T29N, R05W. |
| 12. San Juan 29-5 Com Unit #46 (Dehy pit) | Unit B, Sec. 21, T29N, R05W. |
| 13. San Juan 29-5 Unit #63 (Dehy pit)     | Unit M, Sec. 17, T29N, R05W. |

- |     |                                    |                              |
|-----|------------------------------------|------------------------------|
| 14. | San Juan 29-6 Unit #10 (Dehy pit)  | Unit B, Sec. 02, T29N, R06W. |
| 15. | San Juan 29-6 Unit #24A (Dehy pit) | Unit O, Sec. 21, T29N, R06W. |
| 16. | San Juan 29-6 Unit #46 (Dehy pit)  | Unit L, Sec. 27, T29N, R06W. |
| 17. | San Juan 29-6 Unit #85 (Dehy pit)  | Unit A, Sec. 27, T29N, R06W. |
| 18. | San Juan 30-5 Unit #56 (Dehy pit)  | Unit M, Sec. 22, T30N, R05W. |
| 19. | Schalk Com 57 #1 (Dehy pit)        | Unit C, Sec. 12, T30N, R05W. |

- B. At the sites listed below, the vertical extent of pit contaminants in excess of the OCD's recommended remediation levels has not been determined. Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**. The OCD requires that WFS determine the vertical extent of the contamination at these sites.

- |    |                                    |                              |
|----|------------------------------------|------------------------------|
| 1. | San Juan 27-4 Unit #50 (Dehy pit)  | Unit K, Sec. 19, T27N, R04W. |
| 2. | San Juan 29-5 Unit #36 (Dehy pit)  | Unit E, Sec. 33, T29N, R05W. |
| 3. | San Juan 29-6 Unit #45A (Dehy pit) | Unit I, Sec. 27, T29N, R06W. |
| 4. | San Juan 29-6 Unit #50 (Dehy pit)  | Unit H, Sec. 36, T29N, R06W. |

- C. At the sites listed below, the vertical extent of pit contaminants in excess of the OCD's recommended remediation levels has not been determined. In addition, the contaminant concentrations in the landfarms is in excess of the OCD's recommended remediation levels. Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**. The OCD requires that WFS determine the vertical extent of the contamination at these sites and continue remediation of the soils in the landfarms.

- |    |                                   |                              |
|----|-----------------------------------|------------------------------|
| 1. | San Juan 29-5 Unit #34 (Dehy pit) | Unit B, Sec. 34, T29N, R05W. |
| 2. | San Juan Unit #38-32 (Dehy pit)   | Unit M, Sec. 32, T29N, R05W. |

- D. Upon review of the pit closure reports for the sites listed below, the OCD notes that the final pit soil samples at these sites were taken approximately 1 week or more after the excavation of contaminated soils from the pit. These sampling procedures are not appropriate for determining final petroleum contaminant levels in soils from an excavated source area and are unacceptable to the OCD. These types of soil samples for petroleum contaminants must be taken at the time the excavation activities are completed. Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**.

The OCD requires that WFS resample the soils from each pit listed below. The soil samples will be taken from an interval 3 - 5 feet below the base of the pit excavations and will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene (BTEX) and total petroleum hydrocarbons (TPH) using appropriate EPA methods. If the soil BTEX or TPH contaminant concentrations exceed the OCD's recommended remediation levels, WFS will determine the

Mr. Mark Harvey

April 24, 1998

Page 3

vertical extent of the remaining contamination at these sites and, if necessary, remediate the contaminants pursuant to WFS's previously approved pit closure plan.

- |  |                              |
|--|------------------------------|
| 1. San Juan 27-5 Unit #25 (Dehy pit)         | Unit M, Sec. 03, T27N, R05W. |
| 2. San Juan 27-5 Unit #125E (Dehy pit)       | Unit C, Sec. 21, T27N, R05W. |
| 3. San Juan 28-5 Unit #70 (Dehy pit)         | Unit L, Sec. 34, T28N, R05W. |
| 4. San Juan 28-6 Unit #59A (Dehy pit)        | Unit F, Sec. 14, T28N, R06W. |
| 5. San Juan 29-5 Unit #12-30 (Separator pit) | Unit M, Sec. 30, T29N, R05W. |
| 6. San Juan 29-5 Unit #37A (Dehy pit)        | Unit E, Sec. 31, T29N, R05W. |
| 7. San Juan 29-5 Unit #41-31 (Dehy pit)      | Unit A, Sec. 31, T29N, R05W. |
| 8. San Juan 29-5 Unit #53 (Dehy pit)         | Unit L, Sec. 32, T29N, R05W. |
| 9. San Juan 29-5 Unit #66 (Dehy pit)         | Unit L, Sec. 33, T29N, R05W. |
| 10. San Juan 29-6 Unit #43A (Dehy pit)       | Unit J, Sec. 26, T29N, R06W. |
| 11. San Juan 29-6 Unit #45 (Separator pit)   | Unit H, Sec. 27, T29N, R06W. |
| 12. San Juan 29-6 Unit #48-35 (Dehy pit)     | Unit A, Sec. 35, T29N, R06W. |

The OCD will reconsider issuing closure approval of these denied sites upon resubmission of pit closure reports which address the vertical extent of contamination at the sites and contain the final analytical results of all onsite landfarmed soils. The resubmitted reports will include the completed form and all pertinent information related to the vertical extent of contamination, the results of the soil remediation levels achieved in the pits and landfarmed soils, all laboratory and field analyses and associated quality assurance/quality control data and the disposition of any remediated soils.

To simplify the approval process for both WFS and OCD, the OCD requests that WFS submit all future pit closure reports only upon completion of all closure activities including the determination of the vertical extent of contamination and completion of onsite landfarming or composting of contaminated soils and. The OCD requests that WFS also review their pit sampling data prior to submission in order to assure that final pit samplings were conducted in a timely manner during excavation. If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson

Hydrologist

Environmental Bureau

cc:   OCD Aztec District Office  
      Bill Liess, BLM Farmington District  
      Pat Hestor, BLM Albuquerque District  
      Kurt Sandoval, Jicarilla Apache Environmental Office  
      Mike Matush, NM State Land Office