3R - 388

GENERAL CORRESPONDENCE

YEAR(S): 2002



OFFICE: (505) 325-5667

FAX: (505) 327-1496

July 31, 2002

Mr. William C. Olson Environmental Bureau, NMOCD 1220 South St. Francis Drive Santa Fe, NM 87505

AUG 0 5 2002

RECEIVED

RE: Case #3R388. Mañana Gas. Inc.

Cook #1E and Jan Redding #1 Well Sites

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Dear Mr. Olson:

This correspondence is submitted in confirmation of our telephone discussion on July 2, 2002 regarding your letter dated June 13, 2002 to Mr. Ed Hartman of Mañana Gas Co. concerning ground water contamination in the general vicinity of the Cook #1E and the Jan Redding #1 well sites. The supportive documentation you requested is attached: detailed site sketches of the shared location; Bradenhead testing results; a hand sketch with footages to fence lines, and a site map and ground water gradient map copied from the Giant Industries July, 2001 Monitoring Well Installation, Ground Water Sampling and Bioventing Pilot Test, Bloomfield Crude Station, Bloomfield, New Mexico, report prepared by Golden Environmental Management (GEM) to illustrate the interrelationship of the two wells to Giant's documented petroleum release site.

As we discussed earlier this month, after review of the GEM report and the histories of the Cook #1E and the Jan Redding #1, it seems evident that the source of ground water contamination in the area is the former Giant Crude Station and Tank 967-D, not the two Mañana Gas wells for the following reasons:

- ➤ In the GEM report, phase-separated hydrocarbon was noted in MW#2, significantly up gradient of the Cook #1E and the Jan Redding #1 locations according to the GEM ground water gradient map;
- ➢ Both Mañana Gas wells were drilled as gas wells in 1986-87, with no history of discharge to unlined earthen pits, no reports of undesirable events or spills, and no recorded loss of product in their history, giving no reason to suspect those wells as a source;
- The only liquids produced by the two Mañana Gas wells are small amounts of light distillate and water, both of which pass through separators with the distillate going to an aboveground product storage tank and the water temporarily accumulated in a steel tank pit, periodically pumped and transported for disposal;
- ➢ Given the history of the adjacent Giant site, it is much more likely that the Mañana Gas locations have been impacted by Giant's massive release from their transfer tank, or its associated pipeline (not noted on any of the GEM figures);

➤ Several other potential sources are in the immediate vicinity of both the Giant site and the Mañana wells, i.e. at least four very old abandoned well bores with limited to no documentation available as to the plugging process (the Bishop #1, Bishop, #3, Hare #1, and Kittell #1.

For those reasons, it does not seem appropriate to require Mr. Hartman's company to suffer the significant expense of creating, submitting, and implementing a plan for investigation only to prove that none of the ground water impact is attributable to their locations when a responsible party seems to have already been identified.

Therefore, on behalf of Mañana Gas Company and Mr. Ed Hartman, we respectfully request that the requirement for an investigation plan by Mañana Gas Company be rescinded. Mañana Gas Company will be pleased to provide whatever operational records you might request in further support of the efforts of NMOCD with respect to the Bloomfield Tank Station. The documentation previously referred to is attached. Please do not hesitate to call if we can be of further assistance.

Respectfully submitted,

Cynthia A. Sluyter-Gray, CHMM

Manager, Environmental Services, Four Comers On Site Technologies/Souder Miller & Associates

Encl. Site Diagrams – Jan Redding #1 and Cook #1E
Bradenhead Test Results - Jan Redding #1 and Cook #1E
Hand Sketch by Ed Bond, Switcher for Mañana Gas Company

Site Map copied from the Giant Industries July, 2001 Monitoring Well Installation, Ground Water Sampling and Bioventing Pilot Test, Bloomfield Crude Station, Bloomfield, New Mexico Ground Water Gradient Map copied from the Giant Industries July, 2001 Monitoring Well Installation, Ground Water Sampling and Bioventing Pilot Test, Bloomfield Crude Station, Bloomfield, New Mexico

cc: Mr. Ed Hartman, President, Mañana Gas Company Mr. Denny Foust, NMOCD Aztec District Office

CSG/csg

File: 5113689

Farmington, New Mexico

ONSHORE FEDERAL AND INDIAN SITE FACILITY DIAGRAM

Lease Name & Well Number JAN Redding #/	_
Lease Number # 30-0 45 - 26772	_
Communitization Number	
Location unit O Sec 22 Twishp 29 Rng 11 W	<u></u>
This diagram subject to site security plan for New Mexico	
Sealed valves are normally closed during production phase. Drain line v to draw off water and load line valve open to sell condensate.	alve to pit open
Date 7-2-02 N	
$V \longrightarrow E$	
Š	
	☆ Compressor
\triangle	₩ellhead
(Shared with the Copk#/E)	Production Unit
	Storage Tank
	Dehydrator
	△ Meter Run
	Pit Steel Tan
₹	X Sealed Valves

- Automation

Farmington, New Mexico

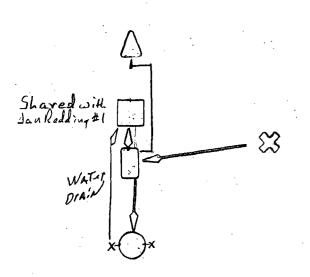
ONSHORE FEDERAL AND INDIAN SITE FACILITY DIAGRAM

Lease Name & Well Number Cook IE DK
Lease Number # 30-0 45-2677/
Communitization Number
Location wit D Sec 22 Twishp 292 Ring 11 w

This diagram subject to site security plan for New Mexico

Sealed valves are normally closed during production phase. Drain line valve to pit open to draw off water and load line valve open to sell condensate.

Date 7-2-02 N



☆ Compressor
₩ Wellhead
Production Unit
Storage Tank
Dehydrator
Meter Run
Pit Steel Tank
X Sealed Valves
Automation



NEW MEXIO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE 1000 RIO BRAZOS ROAD AZTEC NM 87410

(505) 334-6178 FAX: (505) 334-6170 http://emnrd.state.nm.us/ocd/District III/3distric.htm

BRADENHEAD TEST REPORT

(submit 2 copies to above address)

Date of Test_	5-15-02	Operator_	MARIDALE GAS IN	<u>c</u> API #30-0 <u> 45- 2</u>	6772
Property Name Jan Redding Well No. / Location: Unit D Section 22 Township 27 Range 11 w					
Well Status(S	Well Status(Shut-In of Producing) Tubing 169 Intermediate 169 Casing 259 Brandenhead 0				
OPEN BRA	DENHEAD AND IN	TERMEDIATE TO	O ATMOSPHERE INDI	VIDUALLY FOR 15	MINUTES EACH
TIME	PRESSURES: INTERMEDIATE	CASING		BRADENHEAD FLOWED	INTERMEDIATE FLOWED
5 minutes		300	Steady Flow		
10 minutes		306	Surges		
15 minutes		310	Down to Nothin	ng	
20 minutes		310	Nothing		
25 minutes		310	Gas		
30 minutes		310	Gas & Water_		
			Water		/
If bradenhead	flowed water, check a	ll of the descriptions	that apply below:		
CLEAI	R FRESH	SALTY	SULFUR BLA	CK	
5 MINUTE SH REMARKS:	UT-IN BRADENH	ead_ <i></i>	INTERMEDIATE		
By Est.	Bar 2.	Witne	SS		
(Positi	on)				

36. I hereby certify that the information shown on both sides of this form is true and complete to the best of my knowledge and belief.

SIGNED	Ed	Hartman

35, List of Attachments

514

Waiting on El Paso pipeline connection

34. Disposition of Gas (Sold, used for fuel, vented, etc.)

1902 AOF

Test Witnessed By



NEW MEXIC ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION AZTEC DISTRICT OFFICE 1000 RIO BRAZOS ROAD AZTEC NM 87410

(505) 334-6178 FAX: (505) 334-6170 http://emnrd.state.nm.us/ocd/District III/3distric.htm

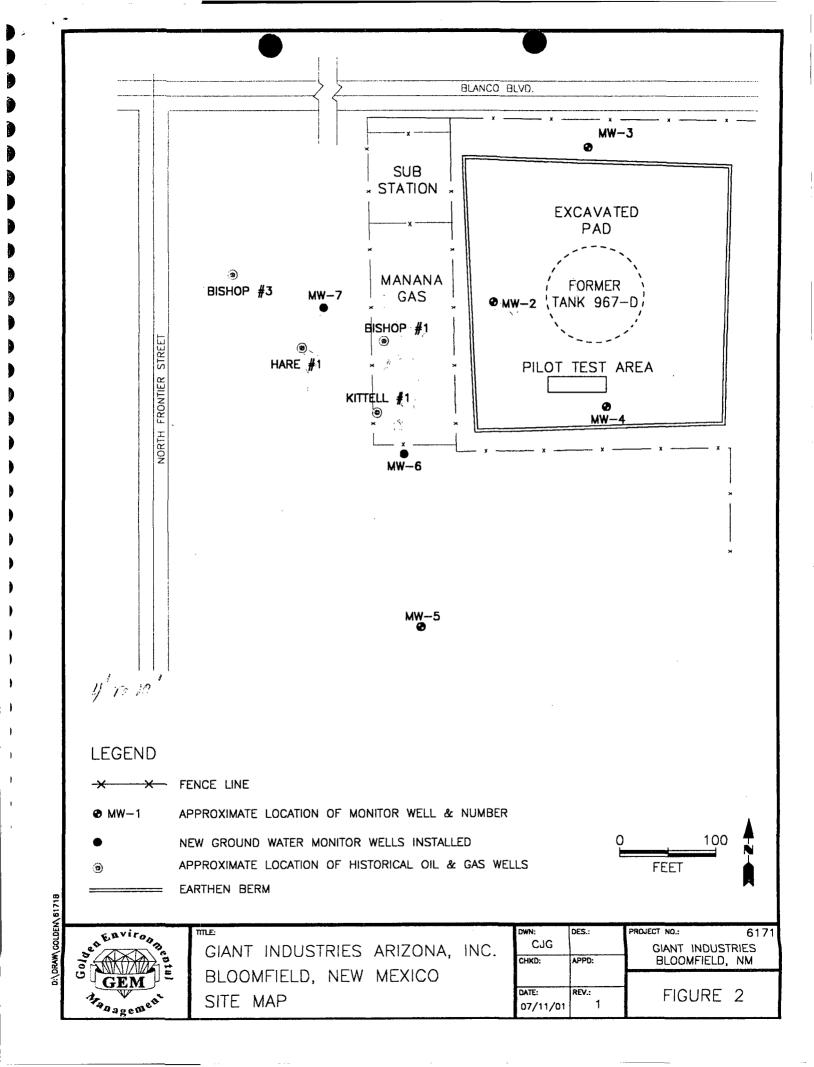
BRADENHEAD TEST REPORT

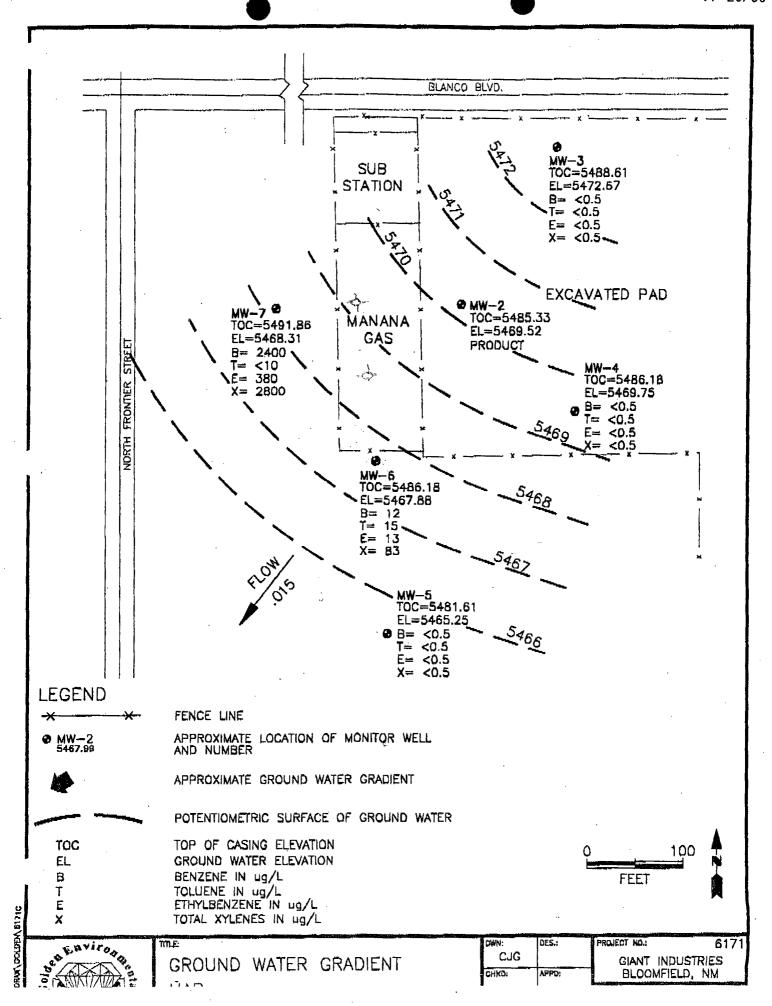
(submit 2 copies to above address)

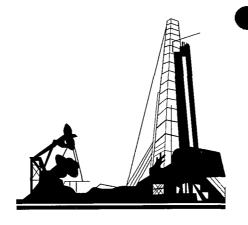
Date of Test_	5-15-02	Operator_	MANARA GAS 10	<u></u> API #30-0 <u>45-</u> 2	26771
Property Nan	me_ <i>Ceo.k</i>	Well No/E	Location: Unit D	Section <u>22.</u> Townsh	nip <u>294</u> Range <u>//</u> M
Well Status(S	Shut-In or Producing) Tubing <u>2/5</u>	Intermediate N/A Cas	ing 229 Brandenl	nead_22
OPEN BRA	ADENHEAD AND IN	TERMEDIATE TO	O ATMOSPHERE INDI	VIDUALLY FOR 15	MINUTES EACH
TIME	PRESSURES: INTERMEDIATE	CASING		BRADENHEAD FLOWED	INTERMEDIATE FLOWED
5 minutes		230	Steady Flow		
10 minutes		232	Surges		
15 minutes		232	Down to Nothin	ng V	and
20 minutes	* * * * * * * * * * * * * * * * * * *	232	Nothing		
25 minutes	11 F. C.	232	Gas		
30 minutes		232	Gas & Water_		
			Water		
If bradenhead	flowed water, check all	of the descriptions	that apply below:		
CLEA	R FRESH	SALTY	SULFUR BLA	CK	
		א	INTERMEDIATE		
5 MINUTE SH	IUT-IN BRADENHE	AD_ <i>U</i>	INTERMEDIATE		
REMARKS:					
By Ex	Bee L	Witne	SS		
	7 1 1 1 1 2 6				
(Posit					

SUB STATION Cook 1E DK Well 57 FT West 56 ½ FT JAN Reddinh Seperator TAN Redding Well 42 F1 57 FT 5/2 FT TANK 22 FT

South Ferce







TRANSMITTAL COVER SHEET

OIL CONSERVATION DIVISION 1220 S. ST. FRANCIS DRIVE SANTA FE, NM 87505 (505) 476-3440 (505)476-3462 (Fax)

PLEASE DELI	VER THIS FAX:
TO:	Ed Hartnen - Mayane Gas
FROM:	Bill Olson
DATE:	6/17/02
PAGES:	30 including coro
SUBJECT:	Cook #1E Well site

IF YOU HAVE TROUBLE RECEIVING THIS FAX, PLEASE CALL THE OFFICE NUMBER ABOVE.



NEW MOXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

June 13, 2002

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 7001-1940-0004-3929-7280</u>

Mr. Ed Hartman Manana Gas, Inc. 2520 Tramway Terrace Court NE Albuquerque, New Mexico 87122

RE: GROUND WATER CONTAMINATION

COOK #1E AND JAN REDDING #1 WELL SITES

CASE #3R388

Dear Mr. Hartman:

The New Mexico Oil Conservation Division (OCD) recently reviewed Giant Industries Arizona, Inc.'s (Giant) July 2001 "MONITORING WELL INSTALLATION, GROUND WATER SAMPLING AND BIOVENTING PILOT TEST, BLOOMFIELD CRUDE STATION, BLOOMFIELD, NEW MEXICO" which contains the results of Giant's investigations of ground water contamination related to Giant's Bloomfield Crude Station in Bloomfield New Mexico. Upon a review of this document it appears that there may also be ground water contamination originating from the adjacent Manana Gas, Inc. (Manana) Cook #1E and Jan Redding #1 well sites located in Unit D Section 22, Township 29 North, Range 11 West, San Juan County, New Mexico.

Therefore, the OCD requires that Manana submit a plan to investigate the extent of any soil and ground water contamination related to the Cook #1E and Jan Redding #1 well sites. The plan shall be submitted to the OCD Santa Fe Office by August 13, 2002 with a copy provided to the OCD Aztec District Office. If you have any questions, please call me at (505) 476-3491.

Sincerely

William C. Olson

Hydrologist

Environmental Bureau

cc: Denny Foust, OCD Aztec District Office

Timothy A. Kinney, Giant Industries Arizona, Inc.

Martin J. Nee, Golden Environmental Management, Inc.