

August 10, 2018

Randy Bayliss
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Hand-Delivered August 10, 2018

**RE: Request for Closure
Former Bloomfield Crude Station
NW/4 of NW/4 of S22 T29N R11W
Bloomfield, New Mexico**

Dear Mr. Bayliss:

Western Refining Southwest, Inc. (Western) requested Site Closure and a determination of No Further Action for the Former Bloomfield Crude Station on August 15, 2014. The Oil Conservation Division (OCD) requested two rounds monitoring to confirm ground water conditions prior to closure. This letter discusses the 2017/2018 monitoring results, historical records search, conclusions and request for closure.

2017-2018 Ground Water Monitoring Events

Western performed groundwater monitoring events in November 2017 and May 2018.

Gauging Results

In May 2018, a Non-Aqueous Petroleum Liquid (NAPL) thickness of 0.31 ft. was observed in MW-7. The LNAPL had a distinctive crude oil odor. See Appendix A - Photographs. The gauging results are presented as Figure 6, Table 1 and groundwater elevation vs. time graphs. The area ground water dropped to the lowest level since the monitoring wells were installed. If the source was the former Giant Crude Station storage tank, the presence of NAPL would be expected in MW-2.

Analytical Results

The November 2017 analytical results were non-detect with the exception of a benzene concentration of 0.074 ug/L in MW-2. In May 2018, the analytical results were non-detect with the exception of MW-7. MW-7 was not sampled due to the presence of NAPL. The Analytical reports are presented in Appendix B.

Historical Records Review

Western has maintained that MW-7 was installed as a cross-gradient well and the presence of dissolved hydrocarbons did not fit the site conceptual model. Western requested that the Oil Conservation Division (OCD) investigate the oil and gas wells in the immediate area. Due to the presence of NAPL, the OCD online well files were revisited to identify possible crude sources. In the photographs, there appear to be two abandoned oil and gas well markers. The markers are approximately 35 and 50 feet west-southwest of MW-7.

OCD File Review

The OCD files show that several crude wells were located in the immediate area. The files are presented in Appendix C. The most likely source is an abandoned oil well Bishop #3 completed in 1925 at a total depth of 700 ft. The well location generally corresponds to the closest well marker to MW-7. Records indicate that the well was abandoned in 1953. The abandonment consisted of well plugs set at the bottom of the well and the surface. The annulus from the top of the well plug to the surface plug remained possibly exposed to the subsurface soils until 1982. The well was re-entered and re-abandoned by an OCD contractor. The reason for the re-abandonment was found in the file.

Aerial Photographs

Western obtained historical aerial photographs for review. See Appendix D. In the 1935 and 1953 aerials, there appears to be an unpaved access road to the area of the well markers.

Conclusions

Western concludes that the NAPL occurrence in MW-7 is from a source other than the former Giant Bloomfield Crude Storage tank.

Closure Request

Respectfully, Western requests approval of the 2014 Closure Request and a determination of No Further Action.

If you should have any questions or require additional information, please contact me at 915-534-1483 or at Allen.S.Hains@andeavor.com.

Sincerely,

Allen S. Hains
Remediation Projects Manager
Western Refining Southwest, Inc.