GW - 193

INSPECTIONS & DATA

BURLINGTON
RESOURCES

SAN JUAN DIVISION

March 7, 2001
CERTIFIED MAIL RETURN RECEIPT NO.70993220000289813946

Wayne Price
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: Burlington Resources Compressor Station Site Inspections 2000. **Manzanares GW-05, Gobernador GW-056, Pump Mesa GW-148, Quinn GW-239, Sandstone GW-193, Rattlesnake GW-093, Buena Vista GW-255, Pump Canyon GW-057, Hart Canyon GW-058, Cedar Hill GW-258, and Middle Mesa GW-07:**

Dear Mr. Price:

New Mexico Oil Conservation Division (OCD) conducted site inspections of 11 Burlington Resource's (BR) compressor stations that have discharge plan permits. Subsequent to these inspections OCD provided a list of inspection recommendations.

BR has successfully completed the recommendations detailed in OCD's inspection report. The written responses to each recommendation are provided in italic bold print following the OCD comment.

Manzanares GW-059:

1. Discharge of oil from the compressors is being deposited on the ground. ***BR removed the stained gravel, deeply raked the underlying soil, applied a remediation enhancing potassium permanganate solution and placed new gravel. An analysis of the cause of the contamination is being performed to identify the source of the hydrocarbon staining. The oil staining appears to be superficial, impacting only the surface gravel and top 2-3 inches of soil underlying the gravel. No direct cause has been determined except for over spray from the engine starter stacks located on this end of the building. The stacks were modified in 1999 with drains to prevent oil accumulations in stacks. Additional modifications to the design may be necessary.***

2. Oil stain found around wastewater tank. ***BR removed the stained gravel, deeply raked the underlying soil, applied a remediation enhancing potassium permanganate solution and covered the soil with new gravel. The tank integrity was visually verified as satisfactory and tank-gauging records do not indicate a tank leak has occurred. The likely source of the staining was an historic minor tank upset that may not have been completely cleaned from the sides and base of tank.***

Gobernador GW-056:

Compressor building drain lines will not hold pressure. ***BR proposed an alternative drain line test during the inspection. The test proposed and implemented was a volume in/volume out drain line test and an analysis of risk for the liquids transported in the drain line system. The volume in/volume out drain line test was successfully completed and demonstrated insignificant risks to the environment from the waste drain line system. A more complete description of the testing procedures and results are provided in Attachment 1.***

Pump Mesa GW-148:

1. Oil stain around produced water tank. ***BR applied a remediation enhancing potassium permanganate solution to the gravel. The staining was superficial and limited to the top surface of the gravel. The cause of the staining was believed to be a dump valve that may have stuck open causing over spray from the top of the tank where the dump line enters the tank.***

2. Oil stain around compressor sump pump. ***BR removed the stained gravel, deeply raked the underlying soil, applied a remediation enhancing potassium permanganate solution and placed new gravel. Hydrocarbon staining was limited to the top 2-4 inches of the soil underlying the gravel. The pump seals were replace and the pump no longer leaks oil.***

Quinn GW-239:

TEG and De-hydrator wastewater tank secondary liner is torn. ***The TEG tank was determined to be a double wall tank and in satisfactory condition. The plastic under the TEG was not replaced and the berm was left in place as tertiary containment. The containment liner under the dehydrator wastewater tank was replaced and berm rebuilt.***

Sandstone GW-193:

Tank farm area lube oil pump is leaking and produced water tank is wet around base. ***Replacing the pump seals repaired the lube oil pump. The gravel and soil around the pump was deeply raked and a remediation enhancing potassium permanganate solution was applied and new gravel placed. The oil contamination was limited to the top 2-4 inches of soil underlying the gravel The wet area around the tank was believed to be natural water and no contamination or tank problems were detected.***

Rattlesnake GW-093:

1. Motor oil and anti-freeze storage tanks do not have proper containment. ***Containments under both tanks were upgraded to meet OCD's requirements.***

2. Oil and water observed in condensate underground wastewater storage tank leak detector. ***The fiberglass wastewater storage tank was removed and replaced with a new metal tank. The condition of the fiberglass tank was satisfactory with no evidence of leaking. Historic contamination was detected adjacent to the wastewater tank and followed under the condensate storage tank during the excavation process. The source of the contamination was believed to be the storage tank. A laboratory sample for clean closure conformation was collected under this tank. The extent of contamination was determined to be limited to the extent of the bermed containment encompassing both storage tanks, approximately 20 feet x30 feet and 16 feet in depth at the deepest point. The impacted soils were removed and land farmed at the Quinn Compressor Station. The excavation was backfilled with clean soils and the facility was rebuilt. A diagram of the excavation and analytical results are included in Attachment 2.***

Buena Vista GW-255:

Submit most recent analysis from monitoring wells. ***The most recent ground water monitoring analysis is provided in Attachment 3. Ground water samples were collected quarterly between 5/96 and 5/98 with no constituents of concern detected. Included in the attachment is a letter from BR to BLM (June 25, 1998) recommending the four wells for plugging and abandonment.***

Pump Canyon GW-057:

Sign needs to be changed from Meridian to Burlington Resources. ***The sign has been changed to read Burlington Resources.***

Hart Canyon GW-058:

Main compressor building sump has lost mechanical integrity. ***The sump was removed and replaced with a new double walled tank with leak detection. No contamination was observed in the tank excavation. The old tank was pressure tested at the fabricators to determine the location of tank failure. The pressure test did not detect any leaks in the tank's primary or secondary walls. The old tank was determined to be in satisfactory condition and should not have been removed. A new procedure for tank integrity and leak detection testing is being developed.***

Cedar Hill GW-258:

Plant main vent system has oil accumulating on stack and system is located in stormwater drain area. ***The staining was caused by hydrocarbons and water that have accumulated in the Emergency Shut Down stack between shutdowns. Shut downs are infrequent and only in an emergency. The oil staining was observed to be insignificant and unlikely to contribute to a reportable storm water release. However, the soil was cleaned and will be monitored for future stack accumulations and any resulting soil staining will be remediated.***

Middle Mesa GW-077:

1. De-hydrator steam condensate wastewater tank needs proper containment. ***The tank was replace with a double walled tank.***

2. Outside west compressor-oil and water being discharged to ground. ***The gravel and soil, to a depth of 6 inches, was removed around the area adjacent to the compressor skid. The remaining soil was deeply raked and a bioremediation enhancing potassium permanganate solution was applied and new gravel placed. The compressor skid was redesigned to prevent oil and water from being discharged to the ground adjacent to the compressor.***

Common action items for all sites:

1. Burlington shall make minor modifications to all discharge plans to include a routine check for emptying all sumps and troughs. ***A Best Management Practice has been developed for this routine check of all sumps and containments.***

2. Burlington shall make minor modifications to all discharge plans up dating where all solid waste is being disposed of. ***The discharge plans provide this information on a table in Section VIII Effluent Disposal, Part B. Off-Site Disposal.***

If you have any questions please do not hesitate to contact me at 505-326-9537.

Sincerely;

J. Gregg Wurtz

J. Gregg Wurtz
Sr. Environmental Rep.
San Juan Division
505-326-9537

Cc: OCD Aztec Office
Attachments-3

Gobernador Waste Drain Line Test

The purpose of this Attachment is to document the successful completion of the drain line test at the Gobernador Compressor station on 11/29/00.

Background

The Gobernador Compressor Station has eight floor drains manifolded into one common 4 inch PVC drain line that flows to an outside sump tank and then to an above ground storage tank. The drain lines are below the concrete floor and collect mainly wash water and petroleum lubes and oils (POLs) generated from normal operation and maintenance of the compressor engines.

The drain lines were tested starting in April 2000 using a hydrostatic test procedure approved by OCD. The drain lines from the outside sump to the above ground storage tank and the sump inspection were tested successfully. The hydrostatic test of the drain lines from the sump to within the compressor building was unsuccessful. The drain lines inside the building failed because they were not able to hold the OCD specified static 3 p.s.i. pressure for 30 minutes. A small amount of pressure was lost during the test until a static level was achieved at ambient pressure and temperature at floor level.

To identify the cause of the test failure BR looked for any missed outlets or small cracks in the drain line that could have contribute to the loss in static pressure. Asbuilts for the station were reexamined for overlooked drain line outlets and all drain line lengths outside of the building were excavated and examined. No missed outlets or breaks in the drain lines were identified. No evidence of discharges was observed along the drain line excavated outside the building. The drain lines within the building are located under the concrete floor and surrounded by concrete and could not be excavated practically. The next step was to perform a visual inspection of the inside of the drain lines with a downhole video camera. The video determined that the condition of the inside of the drain lines was satisfactory and no obvious cracks or damage was observed.

The drain lines are constructed of PVC and designed for gravity flow at ambient pressure and are not designed to operate under pressure. It is important to note that the drain lines when hydrostatic tested are completely full of water but under normal day-to-day gravity flow conditions may only be 1/3 full. Therefore, a crack in the upper 2/3 of the drain line above normal flow height may lead to a failed hydrostatic test but no discharge under normal flow conditions.

Alternative Test

An alternative drain line test was proposed to OCD during a site inspection with Wayne Price, OCD Santa Fe and Denny Foust, OCD Aztec. The alternative test proposed was to use a specific volume in/volume out test for each segment of the drain line. A description of the procedures used to complete the volume in/volume out procedures is provided in

Attachment 1A. In addition, an assessment of the waste that could be potentially discharged by the drain lines was performed.

The volume in/volume out test recovered 100% for each drain line segment (see Table 1, Attachment 1A). The waste analysis based on pre-existing data detected no hazardous waste.

Risk Assessment

Constituent of Concern

An analysis of the products used at the compressor station determined that only POLs are collected in the drain lines at the facilities in significant quantities and no hazardous substances are permitted in the drain lines and sump system.

Under normal engine operation trace amounts of metals are contained in the used oil and these trace metals along with the POLs were identified as the primary constituents of concern for potential releases from the drain lines. Existing analysis preformed to chemically profile the waste water and used oil was used to determine potential risk to the environment. The analysis of the water and the used POLs was performed for detection of metals, Flash point, and total organic halogen and volatile organic compounds. The analytical results determined that the parameters tested were below WQCC standards except for Selenium in the waste water. The Selenium concentration was measured at 0.23 mg/l and the WCCC human health standard for ground water is 0.05mg/l. The analytical results for the water and used oils are provided in Attachment 1A.

The results of the alternative volume in/volume out test demonstrated that an insignificant amount of water or none at all under normal operating conditions is lost from the drain lines

Geology and Hydrology

The receptors for potential releases from the drain line system would be the geologic materials underlying the station and to a lesser extent the ground water beneath the station. The potential for the soil contamination migrating a significant distance and subsequent ground water impacts was determined to be minor based on the following: 1) the drain lines are buried in concrete during construction further inhibiting the release of liquids; 2) the compaction necessary of the soils prior to construction of the compressor facility minimizes infiltration; 3) the 100% recovery results of the drain line volume in/volume out test completed demonstrated insignificant quantity of lost fluid; and 4) the down hole video survey not detecting significant failure in the drain line.

The soils at the Gobernador station consist of a clayey and silty sand. The underlying bedrock formation is sandstone. The cathodic well data in the area indicates the depth to groundwater to be approximately 80 feet. No groundwater was encountered during the

geotechnical test borings to a depth of 25 feet. The aquifer most likely to be affected by a potential discharge in this area is the San Juan Formation. This formation is characterized by interbedded sandstones and mudstones and is approximately 2700 ft. in total thickness. The closest ephemeral stream is the Gobernador Wash approximately ¼ mi southwest of the facility.

The migration of the POLs in the soils beneath the compressor station may be limited based on the characteristics of the POLS and the porosity of soils being fine grained and well compacted. Typically, heavier hydrocarbons do not travel far from the source without facilitated transport (i.e., head pressure) when released into fine compacted soils. Moreover, the risk to human health and the environment from the POLs may be further minimized by the natural biodegradation of the potential hydrocarbons in the soils over time. This coupled with the low hydrologic conductivity of the soils and the lack of natural precipitation to facilitate vertical transport may prevent the potential of groundwater impacts during the life of the compressor station.

Conclusion

The drain lines at the Gobernador Compressor Station present an insignificant risk to human health and the environment. This conclusion was supported by the testing and analysis results including: 1) satisfactory integrity of drain lines excavated outside the building; 2) no major findings of drain line failure using a down hole camera inspection; 3) 100% recovery results of the volume in /volume out testing under normal operation of the drain lines at ambient pressure; 4) the physical characteristics of the liquids minimizing migration; and 5) the analysis of potential constituents of concern in the waste drain line liquids.

To this end, in the unlikely event a release did occur the extent of contamination maybe small and in close proximity to the source and may never impact the groundwater. Finally, a complete remediation of the site will be performed after the decommissioning and abandonment of the station.

Attachment 1A

Volume In/Volume Out Waste Drain Line Testing Procedures

Attachment 1A

Volume In/Volume Out Waste Drain Line Testing Procedures

Preparation

1. Steam clean drain lines and sump prior to test.

2. Install inlet plug with stop flow valve into sump where drain line enters sump. This will aid in the accurate collection of "volume out" water. One person will need to be inside the sump to collect water. Caution this is a confined space and the appropriate confined space permit, freash air, safety procedures and equipment must be used.

3. Use graduated plastic buckets to accurately pour water into and capture water from drain lines.

4. Prevent the introduction of in coming fluids during the test by blocking drain lines at the source.

Test

1. Start at the furtherest drain line inlet from sump. Mark volume in .01-foot increments on volume in and volume out buckets.

2. Volume In: Add 5 gallons of liquid to drain line starting at furthest drain line from sump and document time. Be careful to add water slowly and use funnel to avoid water splash loss.

3. Volume Out: At sump inlet measure return volume in graduated bucket. Allow for sufficient time (approximately 30 minutes) for water to return through drain line. Note time and volume of water collected.

Quality Assurance/Quality Control

1. Repeat one drain line segment test blind to the person collecting the "volume out" measurement inside the sump. Compare both original and repeat "volume out" measurements to document measurement precision.

2. Decrease by ½ gallon the known amount of the "volume in" water added to a randomly selected drain line segment. Do this decreased volume test blind to the person collecting the "volume out" measurement inside the sump. This check will verify "volume out" measurement accuracy

TABLE 1 VOLUME IN/VOLUME OUT TEST RESULTS GOBERNADOR COMPRESSOR STATION

Drain line	Vol. In (gallons)	Vol. Out (gallons)	Time (minutes)	Notes
1	5.0	5.0	20	Start at south engine. Water and .01 ft film of oil
2	5.0	5.0	18	Water and .01 ft film of oil recovered
3	5.0	5.0	18	Water and .01 ft film of oil recovered
4	5.0	5.0	18	Water and .01 ft film of oil recovered
4R	5.0R	5.0R	17R	Water and .01 ft film of oil. Repeat drain line
5	5.0	5.0	17	Water and .01 ft film of oil recovered
6	4.5	4.5	15	Water with .01 ft. film of oil recovered
7	5.0	5.0	15	Water and .03 ft film of oil recovered
8	5.0	5.0	14	Water and .02 ft film of oil recovered

Note:
Graduated bucket accuracy was 0.01 feet

Inter-Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

WASTE OIL CHARACTERIZATION

Client:	**Burlington Resources**		
Project:	BR-Compressor Stations	Date Reported:	12/22/98
Sample ID:	Gobernador Compressor	Date Analyzed:	12/14/98
Laboratory ID:	0398G06966	Date Sampled:	11/10/98
Sample Matrix:	Oil	Date Received:	12/03/98
Condition:	Intact		

Analyte	Result	Units	Maximum Allowable Level
Arsenic	<3.0	ppm	5
Cadmium	<0.20	ppm	2
Chromium	<0.5	ppm	10
Lead	<2.50	ppm	100
Flash Point	>140	°F	must exceed 100
Total Organic Halogens	<1000	ppm	1000-4000

ND - Analyte not detected at stated detection level.

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update III, December, 1996.

Annual Book of ASTM Standards, Vol. 05.01, Method D808-81, 1985.
Annual Book of ASTM Standards, Vol. 15.04, Method D93-80, 1985.

Comments:

Reported by: _____ Reviewed by: _____

imL

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Client: Burlington Resources
Project: Compressor Stations
Sample ID: Water From Used Oil Tank
Lab ID: 0399W05762
Matrix: Liquid
Condition: Cool/Intact

Date Reported: 12/13/99
Date Sampled: 11/23/99
Date Received: 11/23/99
Date Analyzed: 12/03/99

Parameter	Analytical Result	PQL	MCL	Units
TCLP Metals - EPA Method 1311				
Arsenic	<0.1	0.1	5.0	mg/L
Barium	<0.5	0.5	100	mg/L
Cadmium	<0.01	0.01	1.0	mg/L
Chromium	0.05	0.02	5.0	mg/L
Lead	<0.1	0.1	5.0	mg/L
Mercury	<0.001	0.001	0.2	mg/L
Selenium	0.23	0.1	1.0	mg/L
Silver	<0.05	0.05	5.0	mg/L

Reference: SW-846 - "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", United States Environmental Protectic Agency, Final Update 1, July 1992.

Reviewed By: _____
William Lipps

Inter-Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

Flash Point

Client:	**Burlington Resources**		
Project:	Compressor Stations	Date Reported:	12/13/99
Sample ID:	Water From Used Oil Tank	Date Sampled:	11/23/99
Laboratory ID:	0399W05762	Date Received:	11/23/99
Sample Matrix:	Liquid	Date Analyzed:	12/07/99
Condition:	Intact		

Analyte	Result	Units
Flash Point	>140	°F

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

Annual Book of ASTM Standards, Method D56.

Reported by: SW

Reviewed by:

jml

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182 2506 West Main Street, Farmington, NM 87401

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 8260B
VOLATILE ORGANIC COMPOUNDS BY GC/MS

Client:	**Burlington Resources**	Date Reported:	12/08/99
Project ID:	Compressor Stations	Date Sampled:	11/23/99
Sample ID:	Water from used oil tanks	Date Received:	11/24/99
Laboratory ID:	0399W05762	Date Extracted:	NA
Sample Matrix:	Water	Date Analyzed:	12/01/99

Parameter	Analytical Result	Detection Limit	Regulatory Level	Units
Benzene	ND	0.05	0.5	mg/L
Carbon Tetrachloride	ND	0.05	0.5	mg/L
Chlorobenzene	ND	0.05	100	mg/L
Chloroform	ND	0.05	6.0	mg/L
1,2-Dichloroethane	ND	0.05	0.5	mg/L
1,1-Dichloroethylene	ND	0.05	0.7	mg/L
Methyl Ethyl Ketone (2-Butanone)	ND	1.25	200	mg/L
Tetrachloroethylene	ND	0.05	0.7	mg/L
Trichloroethylene	ND	0.05	0.5	mg/L
Vinyl Chloride	ND	0.05	0.2	mg/L

ND - Compound not detected at stated Detection Limit.

Surrogate Recovery	%	Limits
Dibromofluoromethane	97	86 - 118
Dichloroethane-d4	91	80 - 120
Toluene-d8	90	88 - 110
4-Bromofluorobenzene	92	86 - 116

Reference: Test Methods for Evaluating Water, Wastewater and Solid Waste, SW-846,U.S.E.P.A., Volume IB, Revision 2. December 1996.

Analyst

Reviewed

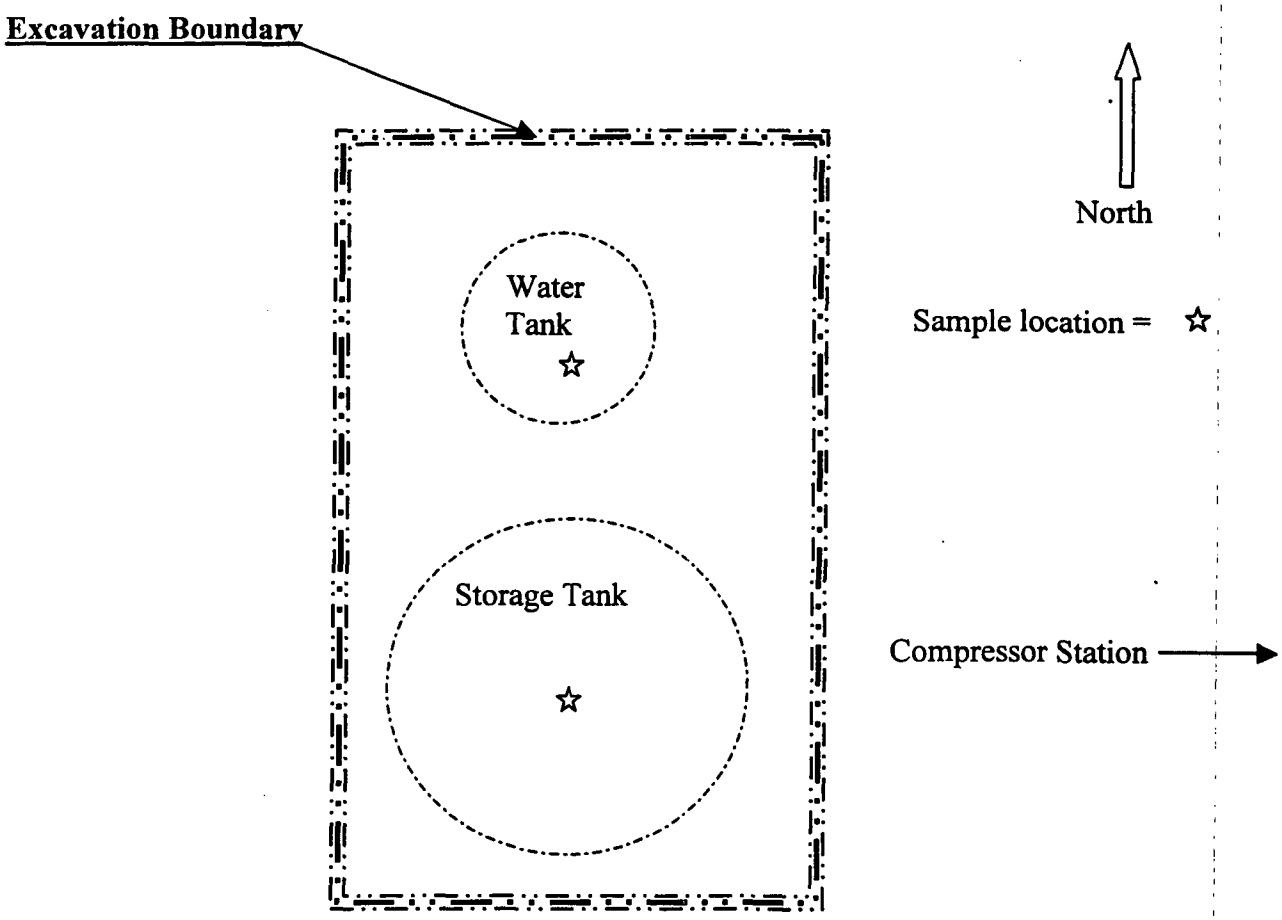
ATTACHMENT 2

RATTLE SNAKE COMPRESSOR STATION TANK WATER TANK REMEDIATION AND REPLACEMENT

Rattle Snake Compressor Station Fiberglass Waste Water Tank Replacement

Events

1. Area under both tanks excavated following the extent of soil contamination staining
2. Samples were collected at the deepest point of contamination under each tank.
3. The contamination was confined to area within berm perimeter (20 feet x 30 feet) and to a maximum depth under the storage tank of 16 feet.
4. Soil was replaced with clean fill and compacted and new water tank and the old storage tank were placed on liners and a berm reconstructed
5. Contaminated soil was land farmed at Quinn Compressor Station location



Sample from Water Tank collected at 8 feet PID field reading 0.0 ppm

Sample from Storage Tank collected at 16 feet BTEX = < 50 ug/kg
DRO/GRO = <30 ug/kg
PID = 0.0 ppm

imL

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Client: Burlington Resources
Project: Rattlesnake Comp. St.
Sample ID: Rattlesnake 12/00
Lab ID: 0300W05574
Matrix: Soil
Condition: Intact

Date Reported: 01/03/01
Date Sampled: 12/19/00
Date Received: 12/20/00

Parameter	Analytical Result	PQL	Units
DRO - METHOD 8015AZ			
Diesel Range Organics (C10 - C22)	<30	30	mg/Kg
Diesel Range Organics as Diesel	<30	30	mg/Kg

Quality Control - Surrogate Recovery	%	QC Limits
o-Terphenyl(SUR-8015)	92	70 - 130

Reference: SW-846 - "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", United States Environmental Protection Agency, November, 1986.

Reviewed By: _____

William Lipps

iml

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Client: Burlington Resources
Project: Rattlesnake Comp. St.
Sample ID: Rattlesnake 12/00
Lab ID: 0300W05574
Matrix: Soil
Condition: Intact

Date Reported: 01/02/01
Date Sampled: 12/19/00
Date Received: 12/20/00

Parameter	Analytical Result	PQL	Units
BTEX - METHOD 8021B			
Benzene	<50	50	ug/Kg
Toluene	<50	50	ug/Kg
Ethylbenzene	<50	50	ug/Kg
Xylenes (total)	<150	150	ug/Kg

Quality Control - Surrogate Recovery	%	QC Limits
4-Bromofluorobenzene(SUR-8021B)	101	70 - 130

Reference: Method 8021b, Volatile Organic Compounds, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, United States Environmental Protection Agency, SW-846, Volume IB.

Reviewed By: _____
William Lipps

Inter-Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

Client: Burlington Resources
Project: Rattlesnake Comp. St.
Sample ID: Rattlesnake 12/00
Lab ID: 0300W05574
Matrix: Soil
Condition: Intact

Date Reported: 01/02/01
Date Sampled: 12/19/00
Date Received: 12/20/00

Parameter	Analytical Result	PQL	Units
GRO - METHOD 8015AZ			
Gasoline Range Organics(C6-C10)	<5	5	mg/Kg
Gasoline Range Organics as Gasoline	<5	5	mg/Kg

Quality Control - Surrogate Recovery	%	QC Limits
4-Bromofluorobenzene(SUR-8015B)	101	70 - 130

Reference: SW-846 - "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", United States Environmental Protection Agency, November, 1986.

Reviewed By: _____
William Lipps

imi
Inter- Mountain Laboratories, Inc.

CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location	ANALYSES / PARAMETERS
Burlington Resources	Rattlesnake Comp. St.	
Sampler: (Signature) Gregg Wurtz	**Chain of Custody Tape No.**	

Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers	BTEX	TPH 418.1 GRO/DRO			Remarks
Rattlesnake 12/00	12/19/00	1500	5519	Soil	1	✓	✓			Method 8015 mod.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Gregg Wurtz	12/19/00	1500	Karin Arrington	12/20/00	0740
Relinquished by: (Signature)	**Date**	**Time**	**Received by: (Signature)**	**Date**	**Time**
Relinquished by: (Signature)	**Date**	**Time**	**Received by laboratory: (Signature)**	**Date**	**Time**

Inter-Mountain Laboratories, Inc.

☐ 555 Absaraka, Sheridan, Wyoming 82801, Telephone (307) 674-7506

☐ 1633 Terra Avenue, Sheridan, Wyoming 82801, Telephone (307) 672-8945

☐ 1701 Phillips Circle, Gillette, Wyoming 82718, Telephone (307) 682-8945

☒ 2506 West Main Street, Farmington, NM 87401, Telephone (505) 326-4737

☐ 11183 State Hwy. 30, College Station, TX 77845, Telephone (979) 776-8945

70466

ATTACHMENT 3

BUNEA VISTA COMPRESSOR STATION
GROUNDWATER MONITORING DATA

BUENA VISTA COMPRESSOR STATION

Quarterly Report for Groundwater Sampling

June 1998

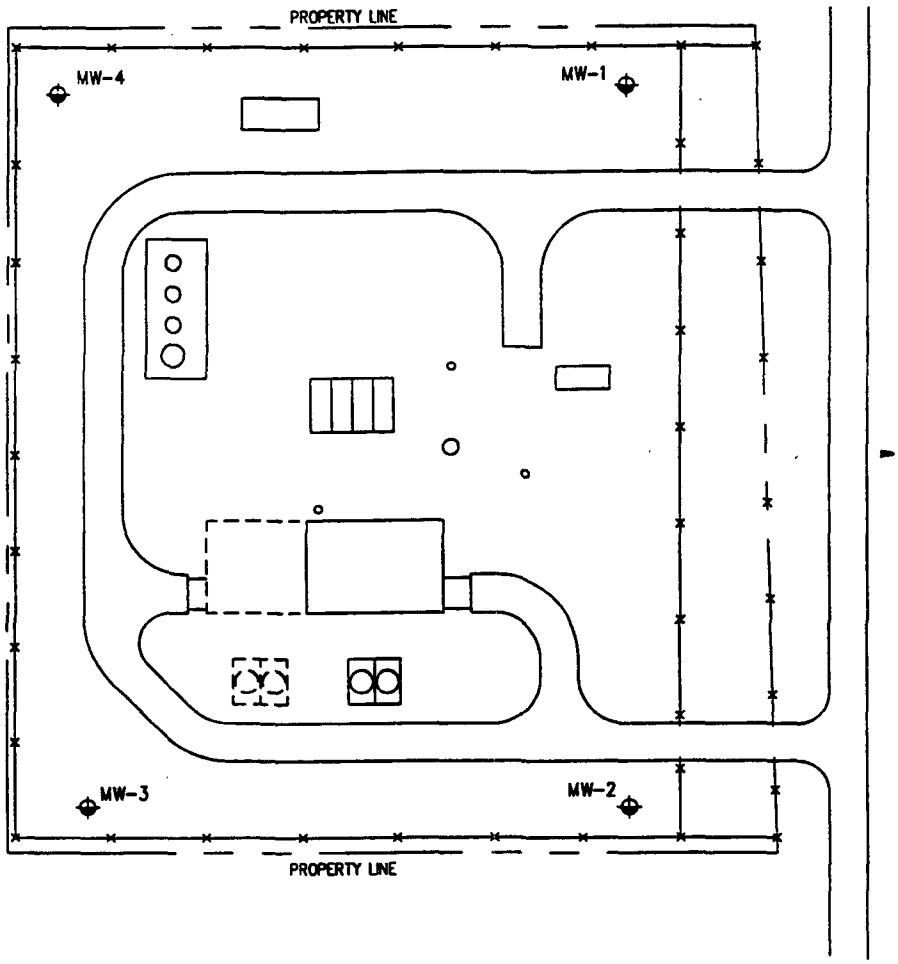
Prepared For

BURLINGTON RESOURCES OIL AND GAS COMPANY, FARMINGTON, NEW MEXICO

Project 16060

PHILIP SERVICES CORP.

4000 Monroe Road
Farmington, New Mexico 87401
(505) 326-2262



LEGEND

MW-1 APPROXIMATE MONITORING WELL LOCATION AND WELL NUMBER

N

0 100'

FEET

NOTE: THIS FIGURE WAS PREPARED USING TRIGON ENGINEERING, INC. SCHEMATIC, FILE NUMBER 8VEMA2.

PHILIP ENVIRONMENTAL

NO.	REVISION	BY	APPR.	DATE
△				

TITLE:

GROUNDWATER MONITORING WELLS
BUENTA VISTA COMPRESSOR STATION
SAN JUAN COUNTY, NEW MEXICO

SCALE	AS NOTED	DATE
DWN:	M.R.W.	9/16/96
DES:		
CHKD:		
APPD:		

PROJECT NO: 16060
BURLINGTON RESOURCES
SAN JUAN COUNTY, NM

FIGURE 1

REV: 0

J:\16060\CIV\CL01-1

TABLE 1
SAMPLE RESULTS FROM GROUNDWATER SAMPLING
BURLINGTON RESOURCES OIL & GAS COMPANY
BUENA VISTA COMPRESSOR STATION

Location	Date Sampled	Benzene µg/L	Toluene µg/L	Ethyl-benzene µg/L	Total Xylenes µg/L	Chloro-benzene µg/L	1,2-Dichloro-benzene µg/L	1,3-Dichloro-benzene µg/L	Trichloro-fluoro-methane µg/L	TDS mg/L
MW-1	05/20/98	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2100
	11/19/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2100
	05/20/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	1100
	02/20/97	< 0.5	< 1.2	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2200
	11/20/96	< 0.5	3.4	0.5	2.2	< 0.6	< 0.7	< 1.1	< 0.6	2100
	08/29/96	< 0.5	< 0.5	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2200
	05/23/96	< 0.5	5.3	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	NA	2100
MW-2	05/20/98	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2300
	11/19/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2100
	05/20/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	1100
	02/20/97	< 0.5	< 1.2	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2300
	11/20/96	< 0.5	3.1	0.6	3.3	< 0.6	< 0.7	< 1.1	< 0.6	2300
	08/29/96	< 0.5	< 0.5	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2300
	05/23/96	< 0.5	5.3	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	NA	2400
MW-3	05/20/98	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	6100
	11/19/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	5600
	05/20/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2700
	02/20/97	< 0.5	< 1.2	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	4800
	11/20/96	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	4400
	08/29/96	< 0.5	< 0.5	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	4400
	05/23/96	< 0.5	5.4	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	NA	4000

µg/L = micrograms per liter
mg/L = milligrams per liter
BTEX Analysis by USEPA Method 8260
TDS Analysis by USEPA Method 160.1
NA - Data not available for this sampling event

PHILIP SERVICES CORP

TABLE 1
SAMPLE RESULTS FROM GROUNDWATER SAMPLING
BURLINGTON RESOURCES OIL & GAS COMPANY
BUENA VISTA COMPRESSOR STATION

CONTINUED

Location	Date Sampled	Benzene µg/L	Toluene µg/L	Ethyl-benzene µg/L	Total Xylenes µg/L	Chloro-benzene µg/L	1,2-Dichloro-benzene µg/L	1,3-Dichloro-benzene µg/L	Trichloro-fluoro-methane µg/L	TDS mg/L
MW-4	05/20/98	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2500
	11/19/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	2800
	05/20/97	< 0.5	< 1.2	< 0.5	< 0.8	< 0.6	< 0.7	< 1.1	< 0.6	1400
	02/20/97	< 0.5	< 1.2	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2600
	11/20/96	< 0.5	< 1.2	0.5	0.8	< 0.6	< 0.7	< 1.1	< 0.6	2300
	08/29/96	< 0.5	< 0.5	< 0.5	< 1.3	< 0.6	< 0.7	< 1.1	< 0.6	2600
	05/23/96	2.5	18	< 2.0	9.7	< 0.6	< 0.7	< 1.1	NA	2500

µg/L = micrograms per liter
mg/L = milligrams per liter
BTEX Analysis by USEPA Method 8260
TDS Analysis by USEPA Method 160.1
NA - Data not available for this sampling event

PHILIP SERVICES CORP

BURLINGTON RESOURCES

SAN JUAN DIVISION

June 25, 1998

Dale L. Wirth
Bureau of Land Management
1235 La Plata Highway
Farmington, New Mexico 87401

Re: Buena Vista Compressor Station
Groundwater Sampling Event

Dear Mr. Wirth:

Burlington Resources Oil and Gas Inc. (BR) is supplying you with a copy of the final Buena Vista Compressor Station Semi-Annual Report for Groundwater Sampling. The final sampling event took place on May 20, 1998. As with the previous sampling, laboratory results indicated that all tested parameters were below laboratory detection limits, except total disolved solids.

All groundwater sampling was done to meet the Buena Vista Environmental Assessment Requirements. Now that these requirements have been met, BR recommends plugging and abandoning the four monitoring wells. Please respond in writing indicating your concurrence.

If you have any questions regarding this submittal, please contact me at (505) 326-9841.

Sincerely,

Ed Hasely
Sr. Staff Environmental Representative

Enclosure: (1) Report for Groundwater Sampling, June 1998

cc: Bruce Gantner - BR
Rick Benson - BR
Buena Vista C.S. Facility File

File: Buena Vista\Groundwater Monitoring & Reports
s:\2-envnmt\grndwatr\facility\bunavsta\corresp\dec97.doc

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 11-7-00 Time: 1:34 PM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☑ Brine St. ☐ Oilfield Service Co. ☐
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐_____

Discharge Plan: No ☐ Yes ☑ DP# GW-193

FACILITY NAME: SANDSTONE COMP ST

PHYSICAL LOCATION: _____

Legal: QTR___ QTR SE Sec 32 TS 31N R 8W County SAN JUAN

OWNER/OPERATOR (NAME) BURLINGTON RESOURCES

Contact Person:_____ Tele:#_____

MAILING

ADDRESS:_____ State_____ ZIP_____

Owner/Operator Rep's: KEVIN JOHNSON / GREG WURTZ

OCD INSPECTORS: PRICE + FOUST

1. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

2. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

TANK FARM

- LUBE OIL PUMP LEAKING
- PRODUCE WATER TANK WET AROUND BASE SHOULD BE CHECKED FOR POSSIBLE TANK LEAK!

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? _____ Yes _____ No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☑ NO ☐ IF NO DETAIL BELOW.

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☑ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

SPCC - YES

14. ANY WATER WELLS ON SITE ? NO ☑ YES ☐ IF YES, HOW IS IT BEING USED ?

GW DEPTH - ≈ 250'

Miscellaneous Comments:

Number of Photos taken at this site: pic #1 - Sign
attachments- pic #2 - MAIN SUMP WITH LD

OCD Inspection November 07, 2000
Pictures by Wayne Price-OCD
Burlington Resources- Sandstone Comp. ST GW-193

Picture #1-Sign

Picture #2- Main Sump with Leak detection

BURLINGTON RESOURCES

SAN JUAN DIVISION

6/1/1999

JUN - 3

New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Attention: Wayne Price

Re: Compressor Station Sump Integrity Inspections

Dear Mr. Price:

The purpose of this correspondence is to provide your office with the results of the compressor stations visual test that was conducted at the following locations:

Pump Canyon	Hart	Manzanares
Buena Vista	Arch Rock	Gobernador
Sandstone	Rattlesnake	Frances Mesa
Quinn	Cedar Hill	Sims Mesa
Pump Mesa	Middle Mesa	

The purpose of the test was to comply not only with the terms and conditions of the original OCD Discharge Plans, but also to satisfy special condition 8. To complete the visual inspection of the sumps, Scat Hot Wash was employed to pressure wash the interior. After the unit was steam cleaned, the residual liquid was removed to allow all areas of the sump to be examined. During the sump inspection no pitting of the steel was observed and the welds appeared to be adequate for sustaining structural integrity.

I thank you for your time and consideration and should you have any questions regarding this correspondence please feel free to contact me at 505-326-9537.

Sincerely,

Jeffery T. Schoenbacher
Environmental Representative

CC: Bruce Gantner
Ed Hasely
Ken Johnson
Kevin Johnson
Denny Foust, OCD District Office
Correspondence

JTS:

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Arch Rock*
Section:	14
Township	32N
Range:	11W
Date of Inspection:	5/26/99
Plan Expiration Date:	2/21/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:

Comments:

pector:

Environmental Representative

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Buena Vista*
Section:	13
Township	30N
Range:	9W
Date of Inspection:	5/25/99
Plan Expiration Date:	9/5/01
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:

Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector:

Environmental Representative

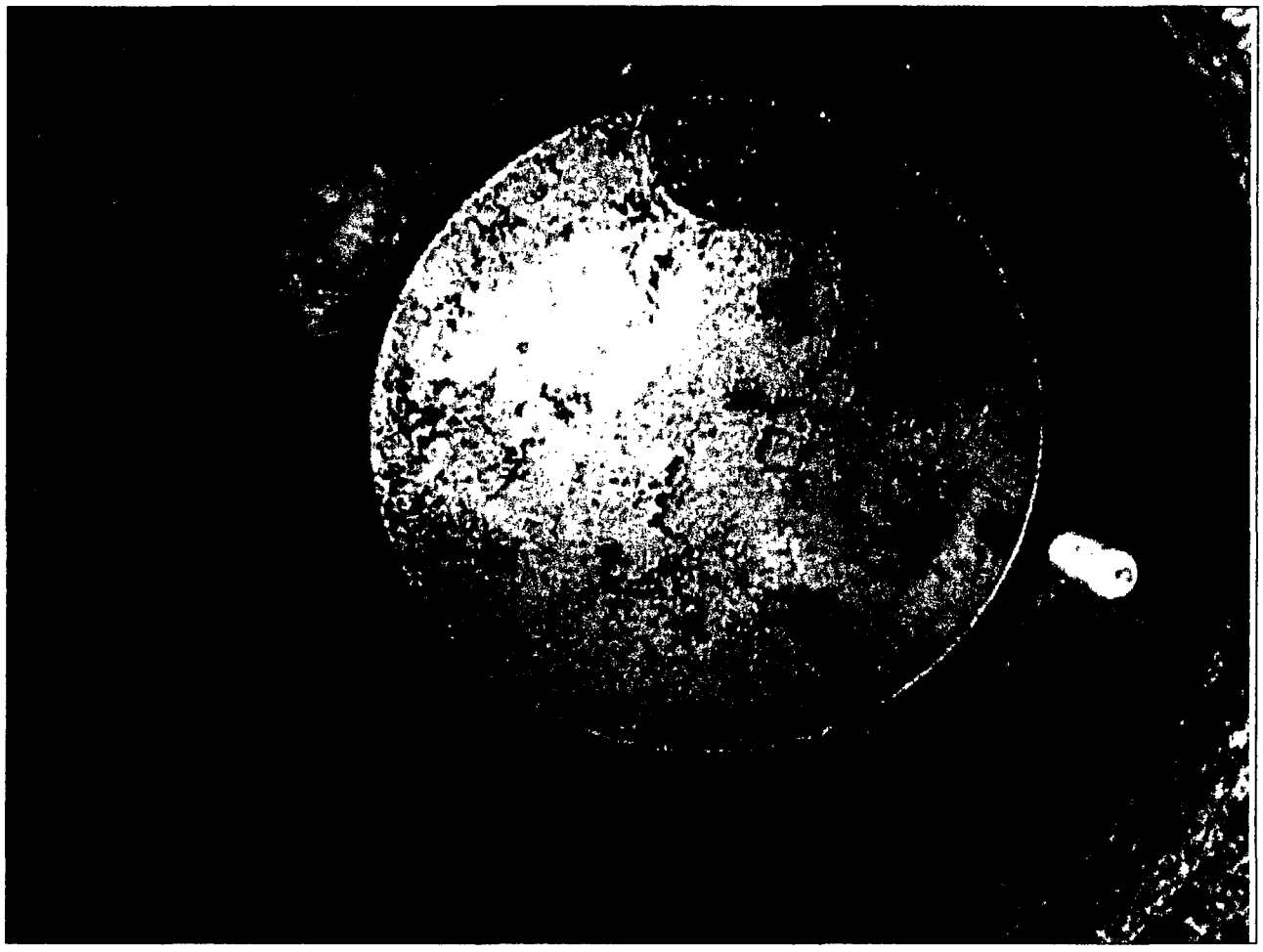
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Cedar Hill*
Section:	29
Township	30N
Range:	10W
Date of Inspection:	5/26/99
Plan Expiration Date:	9/30/01
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

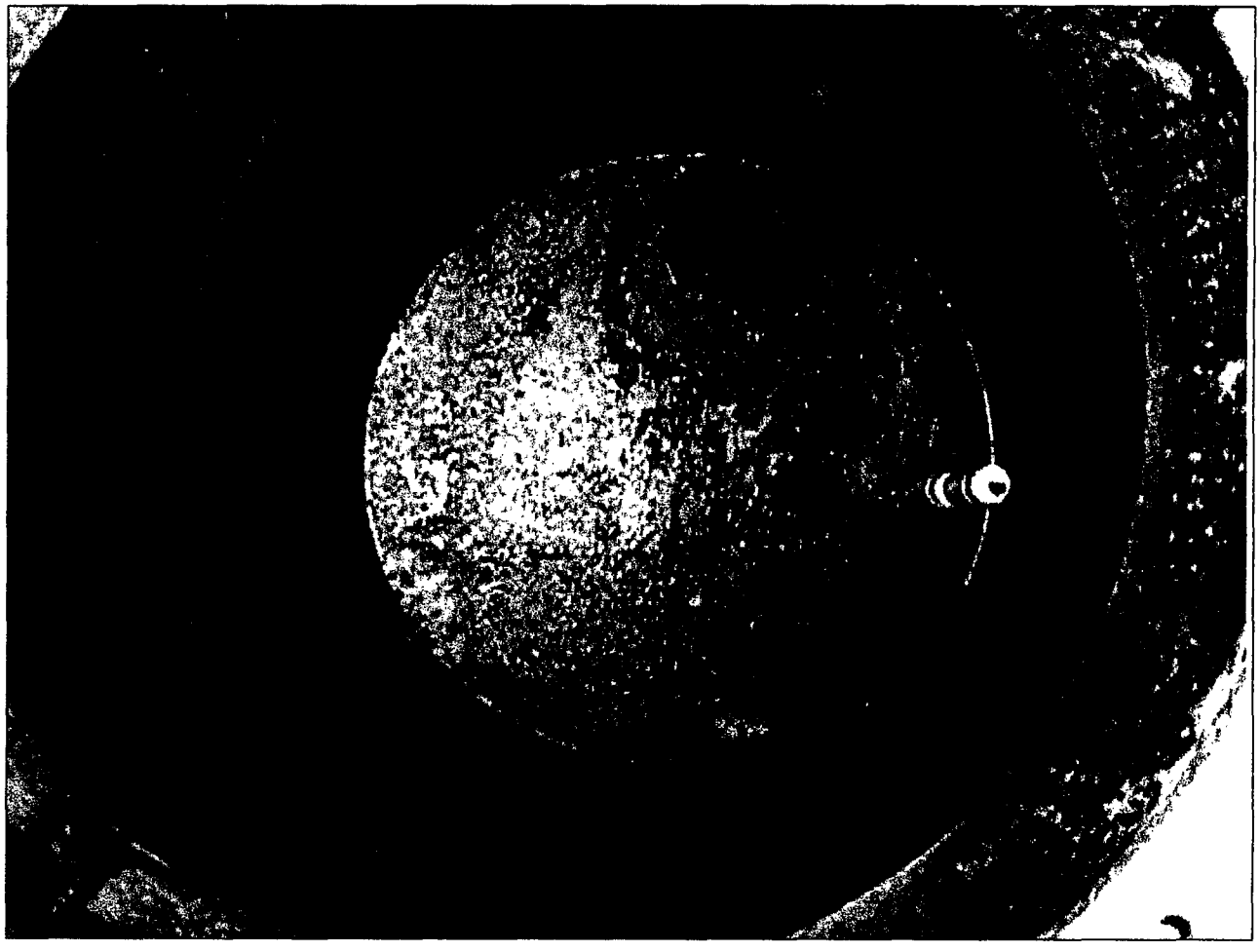
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Frances Mesa*
Section:	27
Township	30N
Range:	7W
Date of Inspection:	5/27/99
Plan Expiration Date:	6/9/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

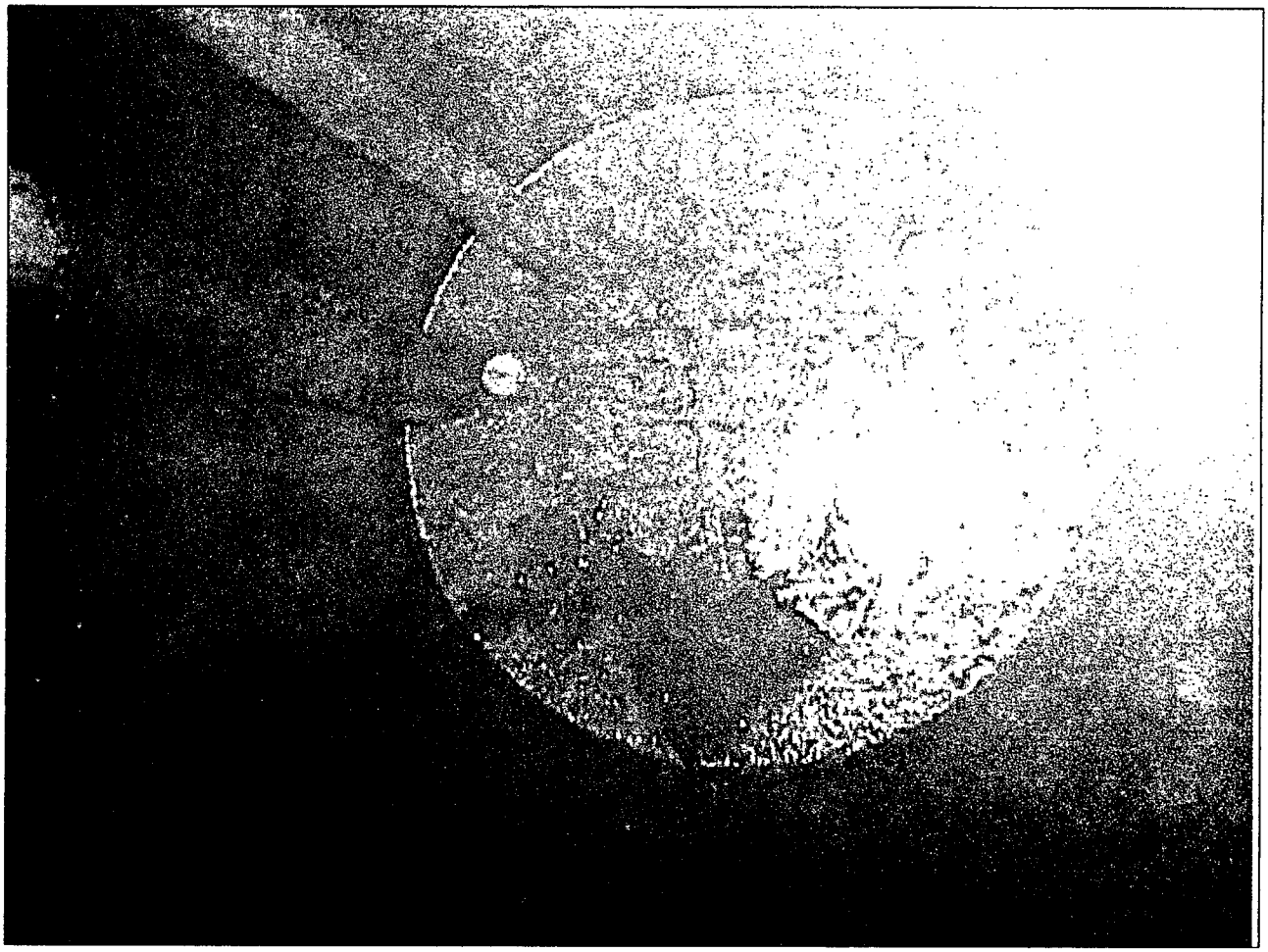
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Gobernador Compressor*
Section:	10
Township	31N
Range:	7W
Date of Inspection:	5/26/99
Plan Expiration Date:	1/11/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector:

Environmental Representative

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Hart Canyon*
Section:	20
Township	31N
Range:	10W
Date of Inspection:	5/26/99
Plan Expiration Date:	0/11/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:

Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector:

Environmental Representative

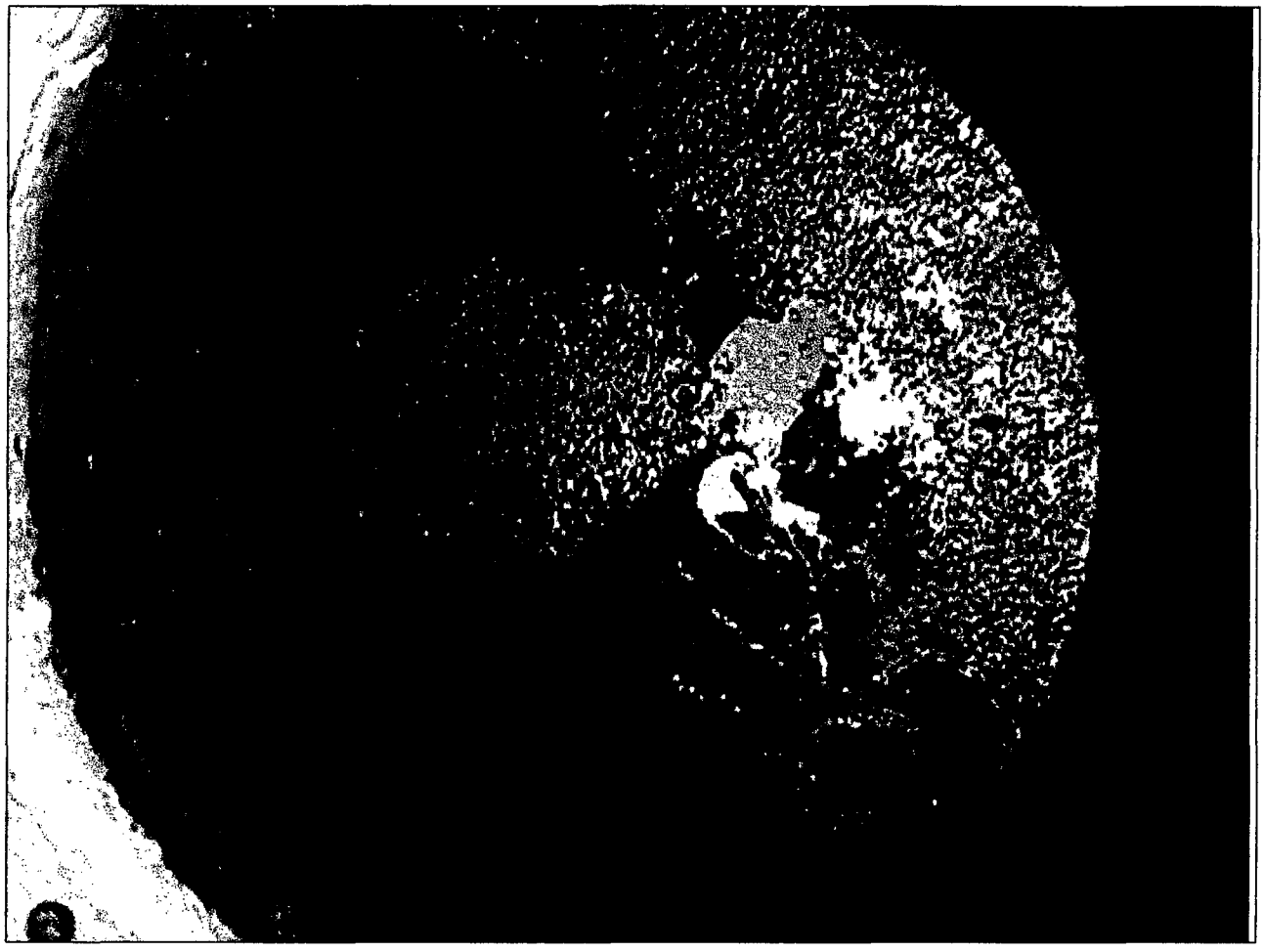
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Manzanares*
Section:	4
Township	29N
Range:	8W
Date of Inspection:	5/27/99
Plan Expiration Date:	0/11/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

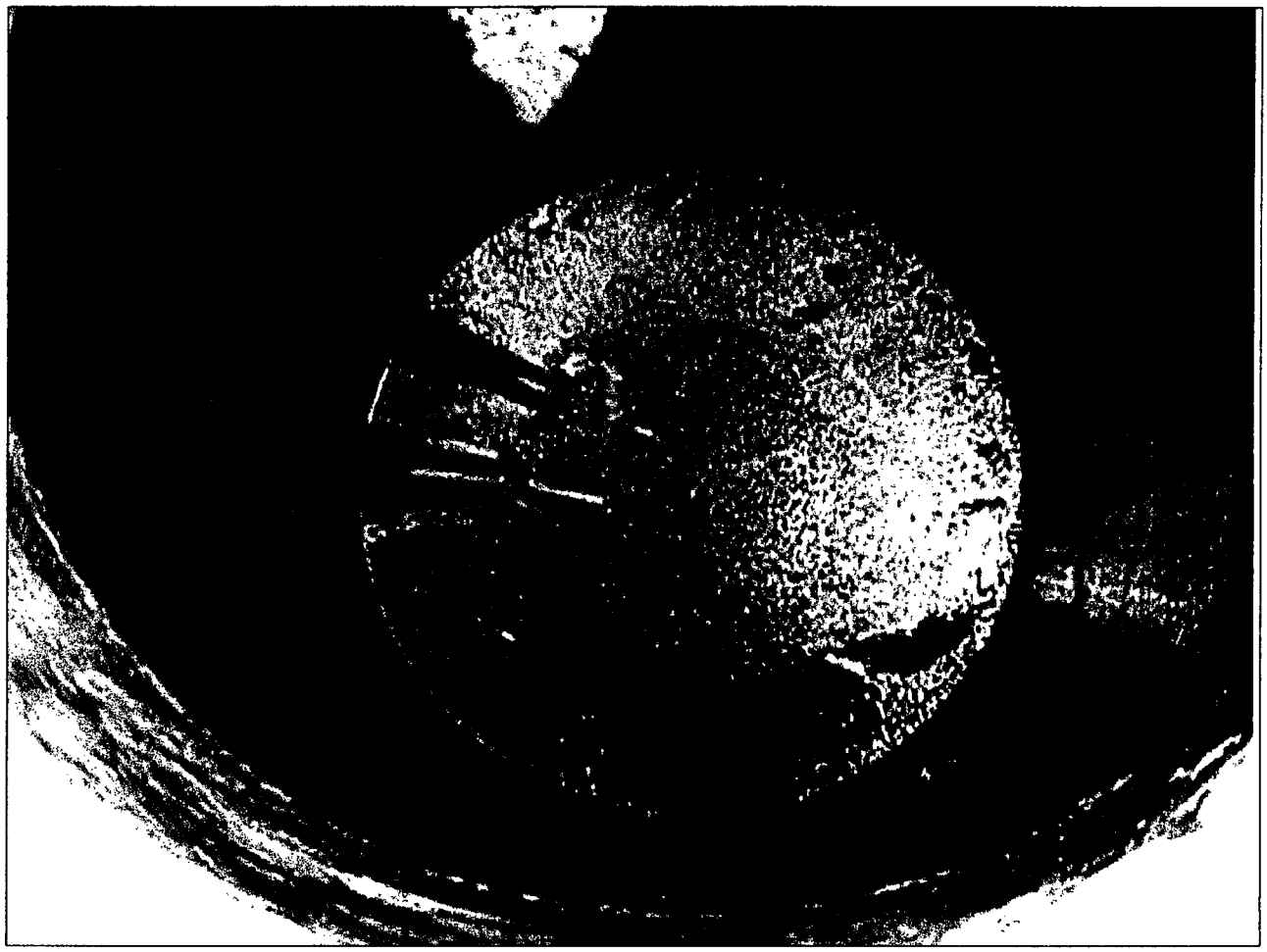
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Middle Mesa Compressor*
Section:	10
Township	31N
Range:	7W
Date of Inspection:	5/26/99
Plan Expiration Date:	1/14/01
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

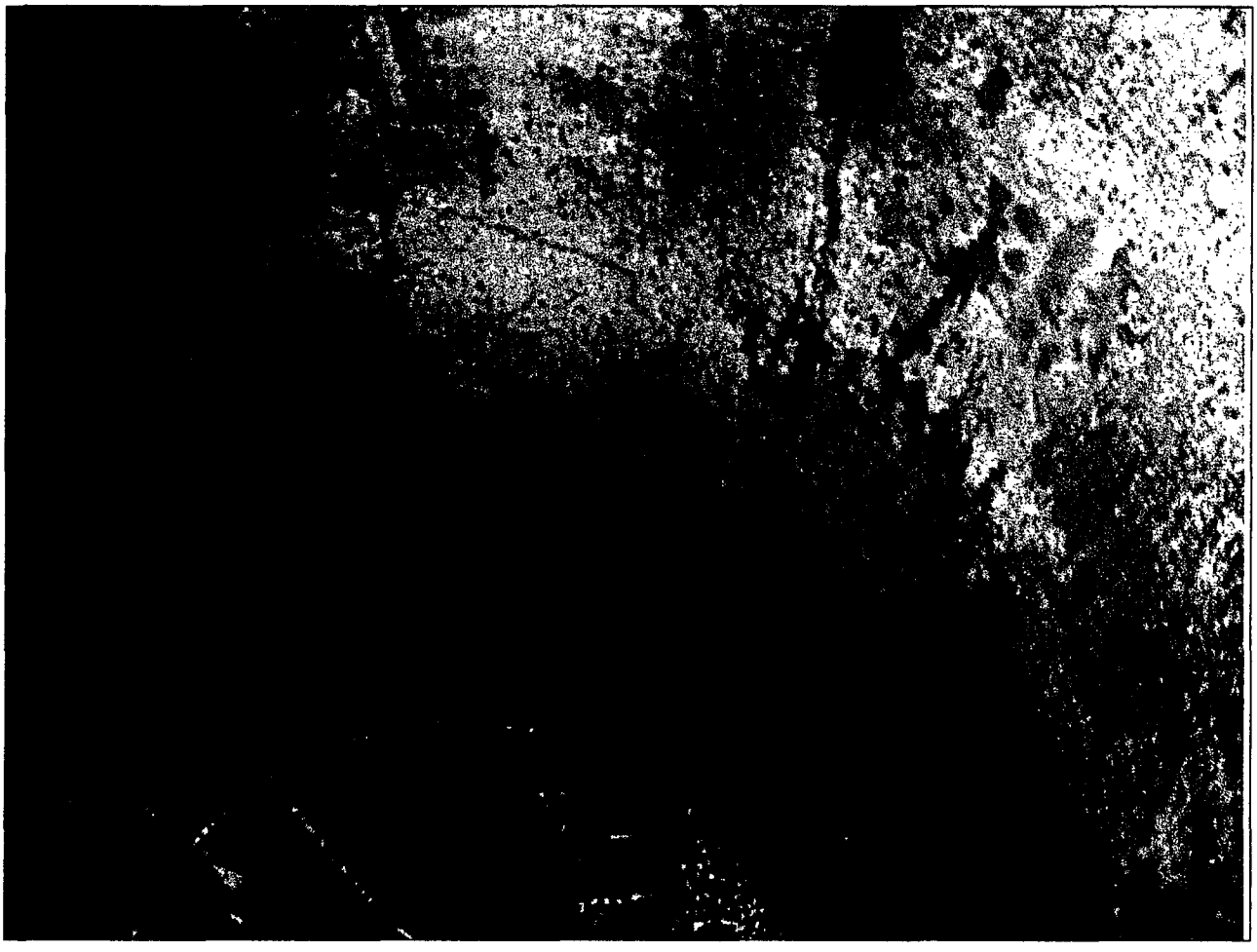
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Pump Canyon*
Section:	24
Township	30N
Range:	9W
Date of Inspection:	5/25/99
Plan Expiration Date:	11/7/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector:

Environmental Representative

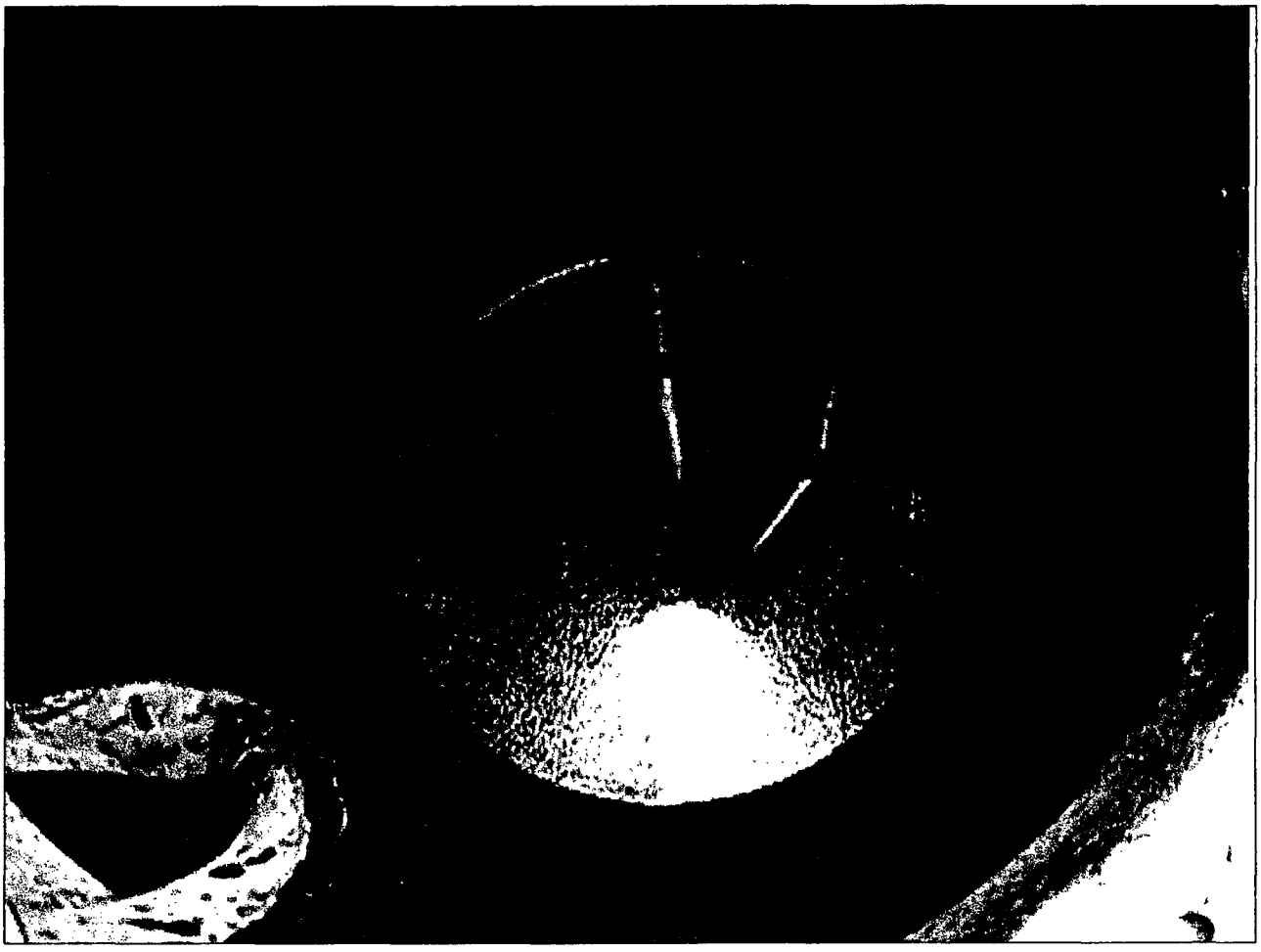
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Pump Mesa*
Section:	27
Township	30N
Range:	7W
Date of Inspection:	5/25/99
Plan Expiration Date:	8/19/03
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections. OCD was not present.*

Inspector: _____
Environmental Representative

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Quinn*	
Section:	16	
Township	31N	
Range:	8W	
Date of Inspection:	5/25/99	
Plan Expiration Date:	8/9/01	
OCD Notified Date:	5/18/99	Written Correspondence to Santa Fe

Photograph:

Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Rattlesnake*
Section:	10
Township	31N
Range:	7W
Date of Inspection:	5/25/99
Plan Expiration Date:	1/17/02
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:

Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Sims Mesa*
Section:	22
Township	30N
Range:	7W
Date of Inspection:	5/27/99
Plan Expiration Date:	8/19/03
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:

Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

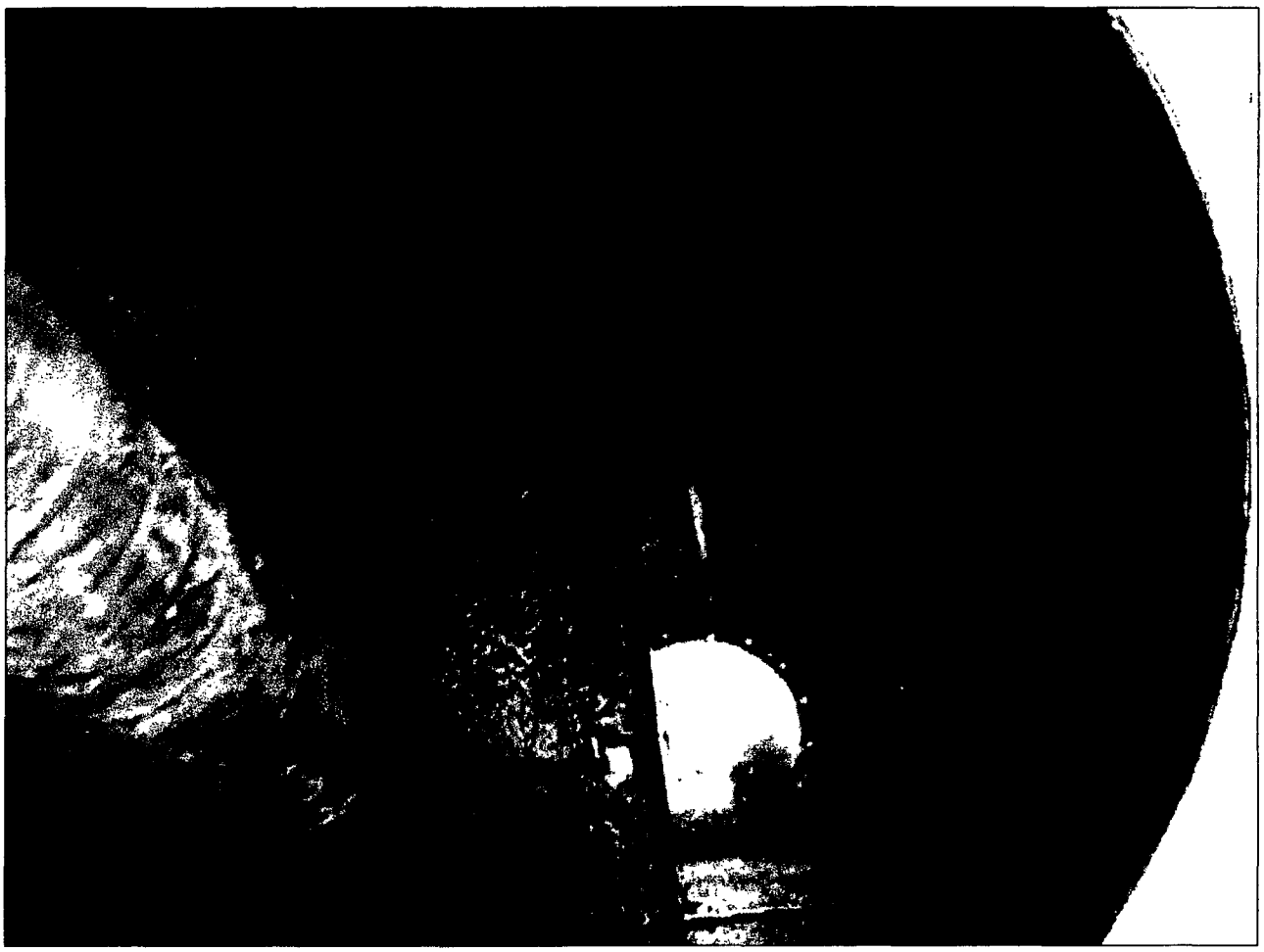
Discharge Plan Sump Inspections

Burlington Resources, San Juan Division
3535 East 30 th Street
P.O. Box 4289
Farmington, NM 87499-4289

Revision Date: Tuesday, June 01, 1999

Compressor Station:	*Sandstone*
Section:	32
Township	31N
Range:	8W
Date of Inspection:	5/25/99
Plan Expiration Date:	6/9/00
OCD Notified Date:	5/18/99 Written Correspondence to Santa Fe

Photograph:



Comments: *No problems were observed. Kevin Johnson was present for all sump inspections.*

Inspector: _____
Environmental Representative

D. Compressor skids and the area around them have visible lube oil contamination - MOI needs to purpose a soil clean-up around the skids and put in place better operating practices and evaluate current skid spill containment for its adequacy.

E. MOI needs to store empty drums on their side with the bungs in place and horizontal to the ground. MOI also needs to store drums that contain fluids other than fresh water on an impermeable pad and curb type containment. All drums and items that contain chemicals need to be properly labeled as to their contents.

D. MOI needs to verify where all solid wastes (i.e. RCRA Subtitle D and RCRA Exempt) go to and if there are changes from the previously approved OCD discharge plan.

F. The below grade tank needs to have the secondary containment visually checked at least monthly and documented.

4. **GW-194 or Frances Mesa Compressor Station,** Many of the same items listed above for the Sandstone Compressor also apply to the Frances Compressor station as well. Also, inside of the compressor building MOI had 55 gallon drums with a screen on the bottom with a small 1" ball valve for draining into the below grade drain system. MOI needs to make sure that none of this fluid that is drained from these drums is characteristic or listed hazardous waste. Further these fluids are clearly non-exempt from RCRA subtitle C regulations and shall not be allowed for injection into Class II UIC wells. MOI will need to determine the appropriate disposal option for this waste.

5. **GW-194 or Frances Mesa Compressor Station,** See photo No. 4 MOI GW-194, This tank area needs to addressed as required in "1. **GW-193 or Sandstone Compressor Station,"** above.

If you have any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer
Environmental Bureau OCD

Attachment

XC: Mr. Denny Foust - Geologist.

P [illegible]

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail *(See reverse)*

Sent to MCI - Keith Bieker	
Street & Number P.O. Box 4289	
Post Office, State, & ZIP Code Farmington, NM 87499-4289	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 26, 1996

CERTIFIED MAIL
RETURN RECEIPT NO.P-594-835-149

Mr. Keith Boedecker
Meridian Oil, Inc.
P.O. Box 4289
Farmington, NM 87499-4289

RE: Discharge Plan Inspections
GW-193 and GW-194
San Juan and Rio Arriba Counties, New Mexico

Dear Mr. Boedecker:

The New Mexico Oil Conservation Division (OCD) on June 6, 1996 along with yourself and Mr. Randy Graves of Meridian Oil Inc. inspected the Sandstone (GW-193) and Frances Mesa (GW-194) compressor stations. The inspections purpose was to determine compliance with the previously approved OCD discharge plans for the facilities. The information that follows will address the concerns of the OCD at the above mentioned facilities.

1. **GW-193 or Sandstone Compressor Station,** see photo No. 2 MOI GW-193.

The bermed area with-in the tank farm has signs of hydrocarbon contamination, MOI needs to clean up the soils and determine the extent of vertical and horizontal contamination, as well as look at design and operating practices at the site.(i.e. - truck load line spill containment box-the lines extend to far outward and cause liquids to be spilled outside of the box area.)

2. **GW-193 or Sandstone Compressor Station,** see photo No. 3 MOI GW-193.

The soil on the blank plastic needs to be characterized as exempt or non-exempt, and disposed of properly according to proper regulatory classification.

3. **GW-193 or Sandstone Compressor Station,** Pollution prevention and housekeeping:

A. The TEG storage tank needs some sort of impermeable pad and curb type containment.
B. The sump on the end of the suction filter separator needs to be cleaned and inspected yearly. Note: All future sump installations will have secondary containment with leak detection and must be approved by the Santa Fe OCD Division office before installation.
C. The Dehydration unit skid appeared to have TEG spilling outside of the metal containment skid-also the still appears to be upsetting on a regular basis. MOI needs to evaluate these operational or design problems and address them so that spillage of TEG may be eliminated.

ATTACHMENT NO.1 - MOI GW-193
SANDSTONE COMPRESSOR

MOI GW-193 (PHOTOS BY OCD)

Photo No. 1 6/6/96

Photo No. 2 6/6/96

MOI GW-193 (PHOTOS BY OCD)

PHOTO No. 3 6/6/96

PHOTO No. 4 6/6/96

ATTACHMENT NO.2 - MOI GW-194
FRANCES MESA COMPRESSOR

MOE GW-194 (PHOTOS BY OCD)

PHOTO NO. 1 6/6/96

PHOTO NO. 2 6/6/96

MUT GW-194 (PHOTOS BY AD)

PHOTO NO. 3 6/6/96

PHOTO NO. 4 6/6/96

MU[redacted] GW-194 [redacted] (PHOTOS BY OLD)

PHOTO NO. 5 6/6[redacted]96