

1R - 298

**GENERAL
CORRESPONDENCE**

YEAR(S):

2001 -

Price, Wayne

From: System Administrator[SMTP:postmaster@usa.conoco.com]
Sent: Wednesday, March 07, 2001 5:16 PM
To: WPrice@state.nm.us
Subject: Delivered: RE: Letter from Landowner requesting input to project



RE: Letter from
Landow...

<<RE: Letter from Landowner requesting input to project>> Your message

To: 'Gatson, Leo'; Price, Wayne
Cc: Wink, Gary; 'Loftus, Thomas A. III'; 'Goates, R. Neal'
Subject: RE: Letter from Landowner requesting input to project
Sent: Wed, 7 Mar 2001 18:01:23 -0600

was delivered to the following recipient(s):

Gatson, Leo on Wed, 7 Mar 2001 18:16:42 -0600
MSEXCH:MSEExchangeMTA:North America-SW:POEX09
Goates, R. Neal on Wed, 7 Mar 2001 18:16:42 -0600
MSEXCH:MSEExchangeMTA:North America-SW:POEX09

Price, Wayne

From: Price, Wayne
Sent: Wednesday, March 07, 2001 5:01 PM
To: 'Gatson, Leo'; Price, Wayne
Cc: Wink, Gary; 'Loftus, Thomas A. III'; 'Goates, R. Neal'
Subject: RE: Letter from Landowner requesting input to project

From: Price, Wayne
Sent: Wednesday, March 07, 2001 4:55 PM
To: Price, Wayne; 'Gatson, Leo'
Cc: Wink, Gary; Loftus, Thomas A. III; Goates, R. Neal
Subject: Re: Letter from Landowner requesting input to project

Dear Mr. Gatson:

The NMOCD has received a letter dated February 28, 2001 from the landowner Mr. McNeill requesting his input to be considered. A copy of the letter has been requested by Conoco's Legal Counsel and was sent to Mr. Loftus (Conoco). As a result of Mr. McNeill's letter the OCD will reiterate that Conoco shall demonstrate that any remaining contaminants shall be protective of public health, fresh water and the environment.

After reviewing the document it appears that Conoco has addressed the issue of groundwater by determining there is no groundwater beneath the site. It also appears they have addressed the surface issue by proposing to install a barrier between the contaminants and the surface. However, Conoco did not supply information pertaining to future land use, population centers, surface water bodies or well head protection areas. Also there was no information supplied as to how the barrier was to be designed or constructed. Please provide this information.

If you have any questions please do not hesitate to E-mail or call me at 505-476-3487.

cc: Mr. McNeill

From: Gatson, Leo[SMTP:Leo.Gatson@usa.conoco.com]
Sent: Friday, March 02, 2001 8:54 AM
To: 'Price, Wayne'; Gatson, Leo
Cc: Wink, Gary; Loftus, Thomas A. III; Goates, R. Neal
Subject: RE: Corrected copy of Work Plan

Thank you,
Leo Gatson
Sr. Field SHEAR Sp.
(915) 686-5427
Pager (800) 573-9602
Leo.Gatson@usa.conoco.com

-----Original Message-----

From: Price, Wayne [SMTP:WPrice@state.nm.us]
Sent: Friday, March 02, 2001 9:54 AM
To: Price, Wayne; 'Gatson, Leo'

Price, Wayne

From: Price, Wayne
Sent: Wednesday, March 07, 2001 2:23 PM
To: 'thomas.a.loftus@usa.conoco.com'
Subject: Conoco Lockhart B-12

Dear Mr. Loftus:

Per your request I am enclosing a copy of a letter (with attachments) dated February 28, 2001 sent to OCD from McNeill Ranches. OCD received this letter March 05, 2001.



Scan1.jpg.jpeg



Scan2.jpg.jpeg



Scan3.jpg.jpeg



Scan4.jpg.jpeg



Scan5.jpg.jpeg



Scan6.jpg.jpeg



Scan7.jpg.jpeg



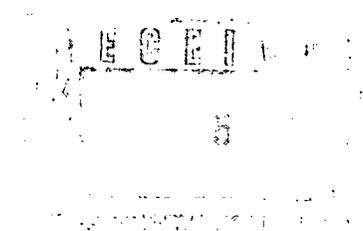
Scan8.jpg.jpeg



McNeill Ranch

William F. McNeill

P.O. BOX ~~1068~~ 1058
Hobbs, N.M. 88241



February 28, 2001

CERTIFIED MAIL: #7000 1670 0009 8294 7910

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Wayne:

I am confirming my telephone conversation with you this morning regarding a pit closure by Conoco in Section 12, Township 21 South, Range 38 East. As I communicated to you this morning I understood that Conoco had reported the above mentioned pit to NMOCD and applied for pit closure approval. Having obtained information from Mr. Leo Gatson of Conoco to the contrary I related this information to you via our morning telephone conversation. Mr. Gaston told me that Conoco's legal department had instructed him that approval was not required because ground water was not present. I communicated to you that in fact lack of ground water was not established until last week when the site was bored for investigative purposes.

I reviewed the "Unlined Surface Impoundment Closure Guidelines" this morning and would like to bring to your attention that guidelines state soil contamination of TPH's must be 5000 parts per million or below when a factor of 0 to 9 occurs. The factor of this site as far as I can determine is 0. Therefore; the contaminated soils must be 5000 ppm or less for TPH at the site. I am enclosing lab reports done on samples of the above site that shows obtaining below 5000 ppm TPH the pit will have to be excavated to an approximate depth of 45 feet to meet requirements.

I am aware that Conoco can apply to have this site reviewed under a RISK basis. I request that the McNeill Ranch be taken into consideration if this solution is considered. As I communicated to you this morning the McNeill's are impacted severely by environmental problems. Lending organizations and potential buyers are presently requiring environmental surveys before borrowing or sales take place. Environmental problems render property

owners unable to borrow money or the ability to sell property without an economic hardship.

Within your guidelines it is stated on page 6, "The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (i.e. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions." I request that the guidelines are followed and I be considered and contacted for comments regarding this matter before you make a final decision.

In regard to another matter I would like to inform you of a possible contamination at Rice Operating Co.'s P-16 disposal well. I have been in contact with Rice and we are at the present time coordinating a test date so samples can be taken and split for analysis. The description of P-16 is Section 16, Township 19 South, Range 38 East.

Thank you for your attention to this matter and contact me at your convenience if you have questions.

Respectfully yours,

A handwritten signature in cursive script that reads "William F. McNeill".

William F. McNeill

ENCLOSURES: 6

TABLE 1
SUMMARY OF TPH AND CHLORIDE
FIELD-SCREENING RESULTS

SOIL BORING	DEPTH	TPH	Chloride
	(feet BGS)	(mg/kg)	(mg/kg)
SB-1	0 (surface)	37	1,300
	4	36,210	14,250
	10	7,140	8,000
	15	12,350	6,500
	20	11,700	4,000
	25	7,940	3,750
	30	6,370	3,250
	35	5,620	1,850
	40	6,020	1,200
	45	4,260	750
	50	1,890	300
	55	917	<250
	65	193	<250
SB-2	10	10,670	-
	20	8,910	-
	30	6,380	-
	35	5,475	-
SB-3	5	<10	-
	10	<10	-
SB-4	5	<10	-
	10	<10	-

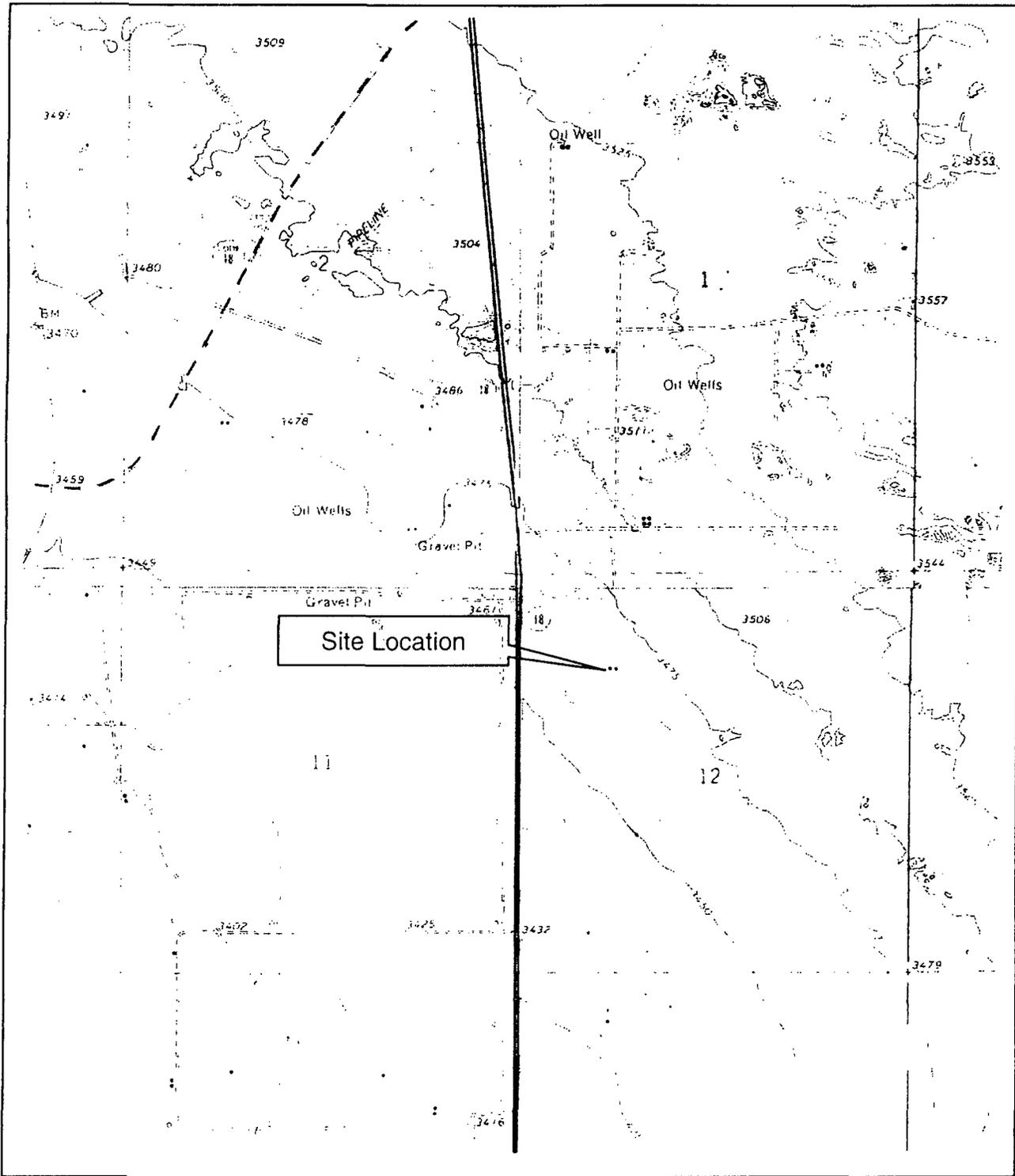
SOIL BORING	DEPTH	TPH	Chloride
	(feet BGS)	(mg/kg)	(mg/kg)
SB-5	5	7,360	-
	10	6,985	-
	15	8,430	-
	20	4,126	-
	25	1,903	-
	30	778	-
	35	514	-
	45	360	-
	SB-6	0 (surface)	
5			8,500
10			6,250
15			4,100
20			3250
25			2100
30			1650
35			900
40			650
45			250
50		<250	
55		<250	
65		<250	

**TABLE 2
SUMMARY OF ENVIRONMENTAL ANALYSIS**

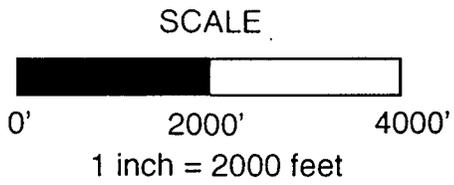
SOIL BORING	DEPTH (feet BGS)	Heated Headspace Analysis (ppm-v)	TPH		GRO (mg/kg)	DRO (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl benzene (mg/kg)	Total Xylenes (mg/kg)	MTBE (mg/kg)
			field (mg/kg)	lab (mg/kg)							
SB-1	4	325	36,210	33,000							
	9.5	319	7,140				<0.50	0.81	<0.50	4.47	<1.0
	20	196	11,700	8,300	330	2,100	<0.50	0.52	0.42	2.5	<1.0
	40	236	6,020	7,100							
	45	142	4,260		380	3,600	<0.25	0.43	0.39	2.7	<0.50
65	6		193	130	8	44	<0.05	<0.05	<0.05	<0.05	<0.1
SB-2	35	1	5,475	6,100			<0.05	<0.05	<0.05	<0.05	<0.1
SB-5	45	6	360	250							
SB-6	65	8	271	270							

Conoco - Lockhart B12
Former Overflow Pit
February 11, 2000

Rhino Environmental Services, Inc.

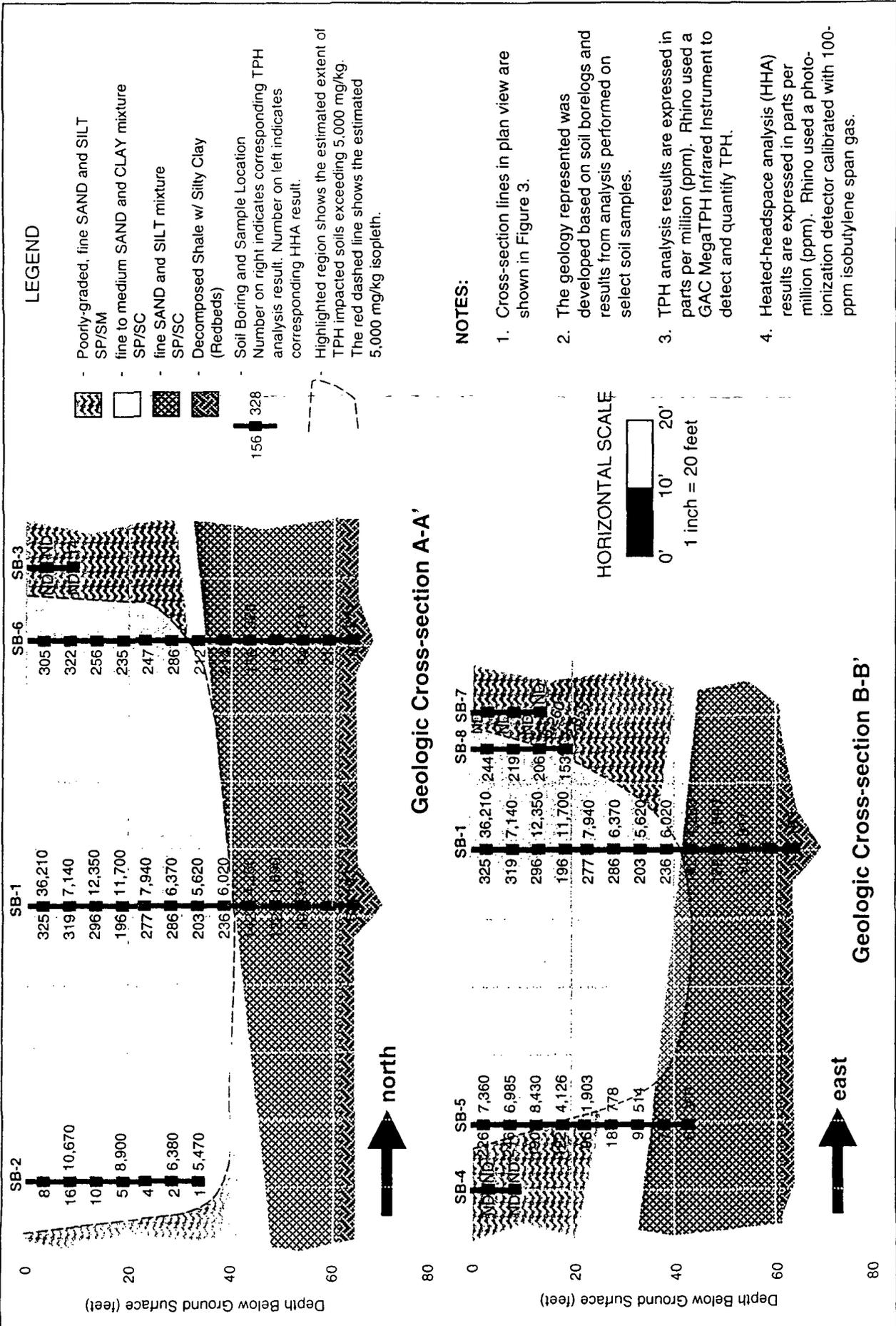


Site Location



From 1979 photorevised USGS quadrangle maps, 7.5' series titled: Hobbs, SW and Eunice, NM and Hobbs, SE and Eunice, NE, TEXAS - NM.

	OSI	Site Location Map	Figure 1
	RH99-AH18	Lockhart B12 - T21S, R37E, Sec. 12	February 2000



	OSI	Generalized Geologic Cross-section Drawings	Figure 4
	RH99-AH18	Lockhart B12 - Tank Battery - T21S, R37E, Sec. 12	February 2000

Price, Wayne

From: Price, Wayne
Sent: Friday, March 02, 2001 8:54 AM
To: Price, Wayne; 'Gatson, Leo'
Cc: Wink, Gary; Loftus, Thomas A. III; Goates, R. Neal
Subject: RE: Corrected copy of Work Plan

Approved!

From: Gatson, Leo[SMTP:Leo.Gatson@usa.conoco.com]
Sent: Friday, March 02, 2001 8:50 AM
To: 'Price, Wayne'; Gatson, Leo
Cc: Wink, Gary; Loftus, Thomas A. III; Goates, R. Neal
Subject: RE: Corrected copy of Work Plan

Dear Mr. Price:

Re: OCD Conditions for Lockhart B-12 Work Plan approval

I would like to suggest a few changes because of the present variations in weather conditions

The weather conditions are not conducive to a 72 hours notification before sampling. I suggest 48 hours notification with a 24 hours final notification and that there be no more than one wait for OCD representative to arrive on location once a time has been set.

I also suggest that the final report be in the OCD's office 30 days after the work is completed.

Final suggestion is that the waste manifests be obtained for Sundance Services since they retain copies as required by the state.

Thank you in advance for your cooperation on this project.

Leo Gatson
Sr. Field SHEAR Sp.
(915) 686-5427
Pager (800) 573-9602
Leo.Gatson@usa.conoco.com

-----Original Message-----

From: Price, Wayne [SMTP:WPrice@state.nm.us]
Sent: Wednesday, February 28, 2001 4:54 PM
To: 'Gatson, Leo'
Cc: Wink, Gary
Subject: RE: Corrected copy of Work Plan

Dear Mr. Gatson:

Re: Conoco Lockheart B-12

The OCD approves of the plan with the following conditions:

1. Please submit a complete closure report at the completion of the project, to include all pertinent information including photos, plot plans, GPS readings from the center of the pit or legal survey, waste manifest, etc,

2. Please include analytical results from soil samples collected from the sidewalls and bottom hole. Final bottom hole samples shall be analyzed for BTEX (EPA method 8021), TPH (8015), WQCC metals, and General Chemistry. Final sidewall samples shall be analyzed for BTEX (EPA method 8021), TPH (8015) and Chlorides.

3. Conoco Inc. will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

A final report shall be submitted to the OCD Santa Fe office by April 1, 2001 with a copy provided to the OCD District office.

> Please be advised that NMOCD approval of this work plan does not relieve

> Conoco Inc. of responsibility should their closure activities have

failed

> to adequately investigate and remediate contamination that pose a threat

> to ground water, surface water, human health or the environment.

In

> addition, NMOCD approval does not relieve Conoco Inc. of responsibility

> for compliance with any other federal, state, or local laws and/or regulations.

>

>

> -----

> From: Gatson, Leo[SMTP:Leo.Gatson@usa.conoco.com]

> Sent: Wednesday, February 28, 2001 2:52 PM

> To: 'Price, Wayne'

> Cc: Williams, Chris; Wink, Gary; Goates, R. Neal; Gatson, Leo

> Subject: Corrected copy of Work Plan

>

> <<File: Lockhart B Work Plan.doc>><<File: Lockhart B-12 Phase I

> Summary.doc>>

> The correction is six inch to six feet as a part of Phase II of the

> project.

> Also attached is a summary of the borings completed in Phase I.

>

> <<Lockhart B Work Plan.doc>> <<Lockhart B-12 Phase I Summary.doc>>

>

> Leo Gatson

> Sr. Field SHEAR Sp.

> ETN 644-5427 or 626-3128

> (915) 686-5427

> Pager (800) 573-9602

> Leo.Gatson@usa.conoco.com

>

>

Price, Wayne

From: Price, Wayne
Sent: Wednesday, February 28, 2001 3:54 PM
To: 'Gatson, Leo'
Cc: Wink, Gary
Subject: RE: Corrected copy of Work Plan

Dear Mr. Gatson:

Re: Conoco Lockheart B-12

The OCD approves of the plan with the following conditions:

1. Please submit a complete closure report at the completion of the _____ project, to include all pertinent information including photos, plot _____ plans, GPS readings from the center of the pit or legal survey, _____ waste manifest, etc,
2. Please include analytical results from soil samples collected from the _____ sidewalls and bottom hole. Final bottom hole samples shall be _____ analyzed for BTEX (EPA method 8021), TPH (8015), WQCC metals, _____ and General Chemistry. Final sidewall samples shall be analyzed for _____ BTEX (EPA method 8021), TPH (8015) and Chlorides.
3. Conoco Inc. will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

A final report shall be submitted to the OCD Santa Fe office by April 1, 2001 with a copy provided to the OCD District office.

Please be advised that NMOCD approval of this work plan does not relieve Conoco Inc. of responsibility should their closure activities have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Conoco Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Gatson, Leo[SMTP:Leo.Gatson@usa.conoco.com]
Sent: Wednesday, February 28, 2001 2:52 PM
To: 'Price, Wayne'
Cc: Williams, Chris; Wink, Gary; Goates, R. Neal; Gatson, Leo
Subject: Corrected copy of Work Plan

<<File: Lockhart B Work Plan.doc>><<File: Lockhart B-12 Phase I Summary.doc>>
The correction is six inch to six feet as a part of Phase II of the project.
Also attached is a summary of the borings completed in Phase I.

<<Lockhart B Work Plan.doc>> <<Lockhart B-12 Phase I Summary.doc>>

Leo Gatson
Sr. Field SHEAR Sp.
ETN 644-5427 or 626-3128
(915) 686-5427
Pager (800) 573-9602
Leo.Gatson@usa.conoco.com



Lockhart B-12 Pit Remediation

Phase I

The first phase of this project will be to drill the site on all four sides at 50ft and 300ft outside the pit to determine whether or not there is any ground water at the site. The drilling will be done to a depth of either ground water or red bed clay whichever ever comes first. These borings will be located using a GPS to ID the location of the borings and this information will be placed in the final report at the completion of the drilling. The equipment, material and personnel required are as follows. If there is absent of ground water Phase II of the project will proceed.

1. Air rotary drilling rig to complete the drilling. The drilling rig that will be use will be a CME-75 High Torque and will be drilling a 4 ¾ inch hole.
2. Each boring will require two bags of bentonite and two bags of Portland cement for plugging.
3. The personnel required will be a Hydro-Geologist, Sr. Project Manger, a driller and a driller's helper.

Phase II

The second phase of this project will be to remove 6ft of the old pit or source of impact. The remaining impacted material that will be left in place will be capped with 3ft of red bed clay (note the cap will extend beyond the impacted floor), 3ft of topsoil and re-seeded. The equipment, material and personnel are as follows.

1. A safety trailer will be on site to be used for briefing area and to have any safety equipment that may be needed.
2. A trackhoe will be used to excavate the impacted soils. A loader will be used to load the impacted soils into 20cyd trucks for transportation to a permitted and approval NMOCD facility for disposal.
3. The personnel that will be required for this phase of the work will be a Sr. Project manger, two heavy equipment operators and truck drivers.
4. It will take an estimated 950cyds of red bed clay to complete the capping due to the fact that the cap will need to extend out past the boundaries of the old pit. Then it will take an estimated 600cyds of topsoil to complete the capping. Upon completion of the capping the site will be re-seeded.
5. Estimated time to complete the capping phase will be about ten working days.



Lockhart B-12 Pit Remediation

Note: The above procedure has been agreed on through a legal process by all parties involved (Conoco and the McNeil Ranch)



Lockhart B-12 Pit Remediation

Phase I Summary

Moved in and drilled boring on all four boundaries of pit site 50ft and 300ft (Total of eight boreholes were drilled).

Drilled the 50ft boring beginning with the north and completed with the east 50ft boring. The soil make-up and depth of location was very consistent. In each case the location of the soil type was encounter at or about the same depth with results being the same.

1. North 50ft contacted red bed clay at 58ft – 60ft no indication of ground water. Boring appeared dry from surface to red bed clay.
2. West 50ft contacted red bed clay at 61ft – 63ft no indication of ground water. Boring appeared dry from surface to red bed clay.
3. South 50ft contacted red bed clay at 61.5ft – 63ft no indication of ground water. Boring appeared dry from surface to red bed clay.
4. East 50ft contacted red bed clay at 58ft – 60ft no indication of ground water. Boring appeared dry from surface to red bed clay.
5. North 300ft contacted red bed clay at 57ft – 58ft no indication of ground water. Boring appeared dry from surface to red bed clay.
6. West 300ft contacted red bed clay at 63ft – 64ft no indication of ground water. Boring appeared dry from surface to red bed clay.
7. South 300ft contacted red bed clay at 62ft – 64ft no indication of ground water. Boring appeared dry from surface to red bed clay.
8. East 300ft contacted red bed clay at 56ft – 58ft no indication of ground water. Boring appeared extremely dry and hard from surface to red bed clay.

Price, Wayne

From: Price, Wayne
Sent: Wednesday, February 28, 2001 1:34 PM
To: 'Leo.Gatson@usa.conoco.com'
Cc: Williams, Chris; Wink, Gary; 'r_neal.goates@usa.conoco.com'
Subject: Conoco Lockhart B12 Remediation project SENW Sec 12-Ts19s-R38e

Attention: Mr. Leo Gaston: 391-3128

Bill McNeil landowner of the above referenced site called and requested that OCD be involved in the Conoco Remediation project for the Lockhart B12 site. His concern was that he wanted to make sure that the closure of the site met OCD clean-up standards.

As explained during our telephone conversation this morning OCD has regulatory authority for remediation projects conducted at Oil and Gas facilities. Therefore please provide OCD a work plan for OCD approval or submit a closure plan for OCD approval at the end of the project.

This project has been assigned OCD Case # 1R0298.

If you have any questions please do not hesitate to call or write.