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APPROVALS

YEAR(S):

1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

November 25, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-219

Mr. B.D. Shaw
Amoco Production Company
200 Amoco Court
Farmington, New Mexico 87401

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco Production Company's (Amoco) December 14, 1994 "AMOCO PRODUCTION COMPANY PIT CLOSURE VERIFICATIONS" which were submitted on behalf of Amoco by their consultant Blagg Engineering, Inc. This document contains "PIT REMEDIATION AND CLOSURE REPORTS" for 35 unlined pits in the San Juan Basin of Northwestern New Mexico.

The OCD's review of the above referenced document is addressed below:

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

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|--------------------------------------|------------------------------|
| 1. Candelaria Gas Com #1 (Blow pit) | Unit K, Sec. 18, T29N, R09W. |
| 2. Florance K #29 (Dehy pit) | Unit K, Sec. 25, T30N, R08W. |
| 3. M.N. Galt J#2 (Blow pit) | Unit D, Sec. 06, T27N, R10W. |
| 4. M.N. Galt J#2 (Separator pit) | Unit D, Sec. 06, T27N, R10W. |
| 5. R.P. Hargrave B#2 (Blow pit) | Unit K, Sec. 04, T27N, R10W. |
| 6. E.J. Johnson C#1E (Blow pit) | Unit C, Sec. 21, T27N, R10W. |
| 7. E.J. Johnson C#1E (Separator pit) | Unit C, Sec. 21, T27N, R10W. |
| 8. Johnston LS#1 (Blow pit) | Unit N, Sec. 11, T28N, R09W. |
| 9. Kutz J. Federal #2 (Blow pit) | Unit B, Sec. 06, T27N, R10W. |
| 10. C.A. McAdams C#1 (Blow pit) | Unit P, Sec. 05, T27N, R10W. |
| 11. C.A. McAdams C#1 (Separator pit) | Unit P, Sec. 05, T27N, R10W. |
| 12. C.A. McAdams C#2 (Blow pit) | Unit K, Sec. 05, T27N, R10W. |
| 13. Michener #1 (Tank pit) | Unit E, Sec. 28, T28N, R09W. |
| 14. Michener LS #5 (Separator pit) | Unit I, Sec. 15, T28N, R09W. |
| 15. P.O. Pipkin #1 (Blow pit) | Unit H, Sec. 08, T27N, R10W. |
| 16. P.O. Pipkin #1 (Separator pit) | Unit H, Sec. 08, T27N, R10W. |

Please be advised that OCD approval does not relieve Amoco 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 Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

B. The pit remedial activities conducted at the sites listed below are satisfactory. However, according to the reports, onsite landfarming and/or composting actions are still continuing at the sites. Subsequently, the OCD cannot issue final closure approval at this time and approval of closure actions at these sites is **denied**. Please resubmit final closure reports for these sites upon completion of the landfarming and/or composting activities. The final reports will include the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

1. Johnston A#1E (Dehy pit) Unit H, Sec. 17, T28N, R09W.
2. Johnston A#1E (Separator pit) Unit H, Sec. 17, T28N, R09W.
3. Johnston A#1E (Tank pit) Unit H, Sec. 17, T28N, R09W.
4. C.A. McAdams C#2 (Separator pit) Unit K, Sec. 05, T27N, R10W.
5. McCulley LS #4 (Blow pit) Unit K, Sec. 14, T28N, R09W.
6. McCulley LS #4 (Separator pit) Unit K, Sec. 14, T28N, R09W.
7. Michener LS #3 (Blow pit) Unit M, Sec. 15, T28N, R09W.
8. Michener LS #4 (Separator pit) Unit N, Sec. 15, T28N, R09W.

C. The final pit remedial contaminant levels at the sites listed below are in excess of the OCD's recommended remediation levels. Subsequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**. The OCD requests that Amoco address the extent of the remaining contamination at these sites. The OCD will reconsider issuing closure approval upon resubmission of pit closure forms which address the remaining extent of contamination at the sites. The resubmitted forms should include the completed form and all pertinent information related to the extent of contamination, the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of all remediated soils.

1. Kutz J. Federal #2 (Separator pit) Unit B, Sec. 06, T27N, R10W.
2. Michener #1 (Blow pit) Unit E, Sec. 28, T28N, R09W.
3. Michener #1 (Separator pit) Unit E, Sec. 28, T28N, R09W.

D. Ground water at the site listed below is contaminated with petroleum related constituents in excess of New Mexico Water Quality Control Commission ground water standards and the extent of ground water contamination at the site has not been determined. Therefore, approval of this pit closure form is **denied**. The OCD requests that Amoco investigate the extent of contamination and, if necessary, remediate contaminated ground water pursuant to Amoco's November 21, 1995 ground water investigation/remediation work plan which was approved by the OCD on November 29, 1995.

1. E.J. Johnson C#1E (Tank pit) Unit C, Sec. 21, T27N, R10W.

E. The reports for the sites listed below do not contain the benzene, toluene, ethylbenzene and xylene (BTEX) final contaminant concentrations in soils at the base of the excavations; the BTEX and total petroleum hydrocarbon (TPH) final contaminant concentrations of the onsite remediated soils; the laboratory analytical data sheets and associated quality assurance/quality control data for the TPH soil analyses listed in the reports; nor the final disposition of the remediated soils. Subsequently, the OCD cannot issue final closure approval at this time and approval of closure actions at these sites is **denied**. The OCD will reconsider approval of the closure actions at these sites when the reports are resubmitted with the above information.

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| 1. Federal Gas Com F#1 (Blow pit) | Unit A, Sec. 07, T27N, R12W. |
| 2. GCU #124 (Blow pit) | Unit D, Sec. 35, T28N, R12W. |
| 3. GCU #190E (Blow pit) | Unit K, Sec. 32, T28N, R12W. |
| 4. GCU #190E (Separator pit) | Unit K, Sec. 32, T28N, R12W. |
| 5. GCU #219 (Separator pit) | Unit A, Sec. 23, T28N, R12W. |
| 6. Johnson Gas Com C#1E (Blow pit) | Unit L, Sec. 07, T27N, R12W. |
| 7. Johnson Gas Com C#1E (Separator) | Unit L, Sec. 07, T27N, R12W. |

To simplify the approval process for both Amoco and OCD, the OCD requests that Amoco submit all future pit closure reports only upon completion of all closure activities including onsite landfarming or composting of contaminated soils. The reports should include the completed form and all pertinent information related to the extent of contamination, the results of the soil remediation levels in the pits and landfarms, all laboratory analyses and associated quality assurance/quality control data and the disposition of all remediated soils.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Nelson Velez, Blagg Engineering, Inc.