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APPROVALS

YEAR(S):

12/11/1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 11, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-226

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) August 31, 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 40 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**.

- | | |
|--|------------------------------|
| 1. Dryden LS #1 (Tank drain pit) | Unit M, Sec. 28, T28N, R08W. |
| 2. Dryden LS #7 (Separator pit) | Unit N, Sec. 28, T28N, R08W. |
| 3. Florance #42 (Tank drain pit) | Unit M, Sec. 27, T29N, R09W. |
| 4. J.C. Gordon D#2 (Blow pit) | Unit D, Sec. 22, T27N, R10W. |
| 5. J.C. Gordon D#2 (Separator pit) | Unit D, Sec. 22, T27N, R10W. |
| 6. Hamner #2A (Dehy pit I) | Unit C, Sec. 28, T29N, R09W. |
| 7. Hamner #2A (Dehy pit II) | Unit C, Sec. 28, T29N, R09W. |
| 8. Hamner #2A (Separator pit) | Unit C, Sec. 28, T29N, R09W. |
| 9. Hamner #2A (Tank drain pit) | Unit C, Sec. 28, T29N, R09W. |
| 10. Johnson GC B#1 (Blow pit) | Unit H, Sec. 21, T27N, R10W. |
| 11. Johnson GC B#1 (Separator pit) | Unit H, Sec. 21, T27N, R10W. |
| 12. Jones A LS #3 (Separator pit) | Unit G, Sec. 15, T28N, R08W. |
| 13. Jones A LS #3 (Tank drain pit) | Unit G, Sec. 15, T28N, R08W. |
| 14. Martin GC E#1 (Blow pit) | Unit L, Sec. 15, T27N, R10W. |
| 15. Martin GC E#1 (Separator pit) | Unit L, Sec. 15, T27N, R10W. |
| 16. Scherdtfeger A#2X (Tank drain pit) | Unit D, Sec. 31, T28N, R08W. |
| 17. Scherdtfeger A#2X (Separator pit) | Unit D, Sec. 31, T28N, R08W. |
| 18. Scherdtfeger A#2X (Blow pit) | Unit D, Sec. 31, T28N, R08W. |

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. Candelario ADA #1 (Blow pit)	Unit O, Sec. 36, T28N, R09W.
2. Eskeenalwood #1 (Blow pit)	Unit J, Sec. 25, T28N, R09W.
3. Florance C LS #16 (Blow pit)	Unit N, Sec. 20, T28N, R08W.
4. J.C. Gordon A#1 (Blow pit)	Unit D, Sec. 22, T27N, R10W.
5. J.C. Gordon D#3 (Blow pit)	Unit K, Sec. 23, T27N, R10W.
6. J.C. Gordon D#3 (Separator pit)	Unit K, Sec. 23, T27N, R10W.
7. Jennapah #1 (Blow pit)	Unit H, Sec. 36, T28N, R09W.
8. Jennapah GC A#1E (Blow pit)	Unit O, Sec. 36, T28N, R09W.
9. C.M. Morris B#1 (Separator pit)	Unit D, Sec. 15, T27N, R10W.
10. C.M. Morris B#1 (Compressor pit)	Unit D, Sec. 15, T27N, R10W.
11. Navajo Allotted GC A#1A (Separator)	Unit J, Sec. 25, T28N, R09W.
12. Navajo Allotted GC A#1A (Blow pit)	Unit J, Sec. 25, T28N, R09W.
13. Schwerdtfeger A#1E (Separator pit)	Unit L, Sec. 36, T28N, R09W.
14. Schwerdtfeger A#1E (Blow pit)	Unit L, Sec. 36, T28N, R09W.
15. Schwerdtfeger A#1E (Dehy pit)	Unit L, Sec. 36, T28N, R09W.
16. Schwerdtfeger A#1E (Tank drain pit)	Unit L, Sec. 36, T28N, R09W.
17. Schwerdtfeger A LS #1A (Tank pit)	Unit C, Sec. 36, T28N, R09W.
18. Schwerdtfeger A LS #1A (Separator)	Unit C, Sec. 36, T28N, R09W.

C. The final pit remedial contaminant levels at the sites listed below are in excess of the OCD's recommended remediation levels. Consequently, 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,

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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. Federal F#1 (Separator pit) Unit H, Sec. 16, T27N, R10W.
2. Schwerdtfeger A LS #1A (Dehy pit) Unit C, Sec. 36, T28N, R09W.
3. Schwerdtfeger A LS #1A (Blow pit) Unit C, Sec. 36, T28N, R09W.

D. Ground waters at the sites listed below are 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 sites has not been determined. Therefore, approval of these pit closure forms 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. Boyd GC #1A (Separator pit) Unit C, Sec. 08, T31N, R10W.

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.
Charmaine Tso, Navajo Nation EPA