

3R - 47

APPROVALS

YEAR(S):

1993



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

June 23, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-347

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

**RE: GROUND WATER REMEDIATION PLAN
SAN JUAN GRAVEL A#1 LEASE SITE
FARMINGTON, NEW MEXICO**

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has completed a review of the April 1993 " PROPOSED REMEDIAL ACTION PLAN, AMOCO PRODUCTION COMPANY, SAN JUAN GRAVEL TANK BATTERY A#1 PRODUCTION TANK PIT AREA, FARMINGTON, SAN JUAN COUNTY, NEW MEXICO" which was submitted by Envirotech, Inc. on behalf of Amoco. The plan details Amoco's proposal for remediating petroleum contaminated ground water at Amoco's San Juan Gravel A#1 lease site.

The OCD approves of the above referenced remediation plan with the following conditions:

1. The effluent from the air stripper will be sampled on a monthly basis during the first quarter of operation. Thereafter, the air stripper effluent will be analyzed on a quarterly basis. Please be aware that OCD may require analysis for additional constituents if there are contaminants observed during the initial ground water sampling that are not proposed to be monitored.
2. Ground water from all of the monitor wells sampled during the "initial water analysis" will be analyzed for volatile aromatic hydrocarbons, polynuclear aromatic hydrocarbons, heavy metals and major cations and anions using appropriate EPA laboratory methods. Amoco will submit the analytic results of the "initial water analysis" to OCD by August 6, 1993. The OCD will determine if the extent of ground water contamination has been adequately defined based upon these results.

(Note: The OCD does not require water samples to be analyzed for concentrations of total petroleum hydrocarbons.)

Mr. B.D. Shaw
June 23, 1993
Page 2

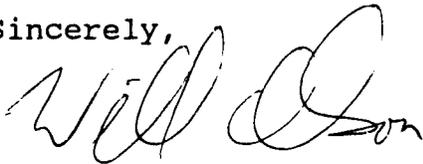
3. All ground water sampling events will include measurement of all standard field parameters such as the water table elevation, free product thickness, pH and specific conductivity.
4. Quarterly reports will be submitted to OCD by **February 1, May 1, August 1 and November 1** for the previous quarter.

The OCD commends Amoco for their initiative in addressing remediation of contaminated ground water and soils that resulted from past disposal practices at the Amoco San Juan Gravel A#1 lease site.

Please be advised that OCD approval will not limit Amoco to the proposed work plan should the remediation system fail to adequately contain and remediate petroleum contaminated ground water related to Amoco activities. In addition, OCD approval does not relieve Amoco of liability for compliance with any other federal, state, city and county laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Denny Foust, OCD Aztec Office