

3R - 92

# APPROVALS

YEAR(S):

2003-1994



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

3092

GARY E. JOHNSON  
Governor  
Betty Rivera  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

January 6, 2003

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 7001-1940-0004-7923-0636**

Mr. Gary Ledbetter  
Conoco, Inc.  
3315 Bloomfield Hwy.  
Farmington, New Mexico 87401

**RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS**

Dear Mr. Ledbetter:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco Inc.'s (Conoco) February 22, 2002 "CONOCO GROUNDWATER REPORT SUMMARY" which was submitted on behalf of Conoco by their consultant On Site Technologies, Ltd. This document contains the results of annual ground water monitoring at a number of former unlined pit sites in the San Juan Basin and requests closure approval of site remediation and monitoring actions at the Salmon #1 site located in Unit P, Sec. 30, T29N, R11W, San Juan County, New Mexico.

The soil and ground water remedial activities conducted at the Salmon #1 site are satisfactory and the OCD **approves** of final site closure on the condition that all site monitor wells be plugged and abandoned by pulling the casing or cutting the casing off below the ground surface, and grouting the annulus from the base to the surface with a cement grout containing 3-5% bentonite. Please be advised that OCD approval does not relieve Conoco of responsibility if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve Conoco of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please call me at (505) 476-3491.

Sincerely,

William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
John Hagstrom, On Site Technologies, Ltd.



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 5, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-239**

Ms. Judy A. McLemore  
Conoco, Inc.  
10 Desta Drive, Suite 100W  
Midland, Texas 79705-4500

**RE: GROUND WATER REMEDIATION PLAN  
SALMON #1 LINE DRIP PIT**

Dear Ms. McLemore:

The New Mexico Oil Conservation Division (OCD) has completed a review of Conoco's March 2, 1995 "SALMON #1 LINE DRIP PIT UNIT P S30-T29N-11W PROPOSED GROUNDWATER TREATMENT PLAN" and February 1995 "BIO-SIR SPARGING REMEDIATION PROJECT FOR SALMON LEASE". These documents requests approval of Conoco's proposal for remediation of contaminated ground water at Conoco's Salmon #1 site.

The above remediation plan is approved with the following conditions:

1. All monitor wells will be constructed with locking caps to prevent unauthorized persons from tampering with the wells.
2. The air sparging wells will be constructed such that the annulus between the lower and upper bentonite plugs is filled with a concrete grout containing 3-5% bentonite.
3. Conoco will sample ground water from all monitor wells on a quarterly basis. Ground water from the monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), heavy metals and using EPA approved methods.

**NOTE:** The OCD does not require Conoco to analyze ground water samples for heavy metals, if:

- a. Conoco can provide the OCD with an analysis of fluids from the line showing that these constituents do not exceed New Mexico Water Quality Control Commission (WQCC) ground water standards, or;
- b. an initial ground water sample from the heart of the plume shows that these constituents do not exceed WQCC ground water standards.

Ms. Judy A. McLemore  
April 5, 1995  
Page 2

4. Conoco will submit remedial system quarterly reports to the OCD by July 1, October 1, January 1, and April 1 of each year with the first report due on July 1, 1995. The reports will contain:
  - a. A description of all activities which occurred during the quarter. The first report will also include as built construction specifics of the remediation system and each monitor well.
  - b. A summary of the analytical results of all sampling during the quarter.
  - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
5. Conoco will notify the OCD at least one week in advance of all scheduled major activities such that the OCD has the opportunity to witness the events and or split samples.
6. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec District Office.

Please be advised that OCD approval does not if contamination exists which is beyond the the activities fail to adequately remediate Conoco's activities. In addition, OCD approval of responsibility for compliance with any laws and/or regulations.

If you have any questions, please call me :

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec Office

P 667 242 239



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PS Form 3800, June 1990

Fold at line over top of envelope to the right of the return address.

**Bill Olson**

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**From:** Bill Olson  
**To:** Frank Chavez  
**Cc:** Denny Foust  
**Subject:** Conoco Salmon #1 Remediation  
**Date:** Tuesday, April 04, 1995 11:06AM  
**Priority:** High

Attached is a draft approval letter for Conoco's recent ground water remediation plan for the Salmon #1 line drip pit. Please provide me with any comments in writing by 11:00 am on 4/6/95. Thanks!

<<File Attachment: REMEDY1.APR>>

**Bill Olson**

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**From:** Frank Chavez  
**Date sent:** Tuesday, April 04, 1995 3:41PM  
**To:** Bill Olson  
**Subject:** Registered: Frank Chavez

**Your message**

**To:** Frank Chavez  
**Subject:** Conoco Salmon #1 Remediation  
**Date:** Tuesday, April 04, 1995 11:06AM  
**was accessed on**  
**Date:** Tuesday, April 04, 1995 3:41PM

**Bill Olson**

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**From:** Denny Foust  
**Date sent:** Tuesday, April 04, 1995 3:57PM  
**To:** Bill Olson  
**Subject:** Registered: Denny Foust

**Your message**

**To:** Denny Foust  
**Subject:** Conoco Salmon #1 Remediation  
**Date:** Tuesday, April 04, 1995 11:06AM  
**was accessed on**  
**Date:** Tuesday, April 04, 1995 3:57PM

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

May 23, 1994

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-113**

Ms. Judy A. McLemore  
Environmental Coordinator  
Conoco, Inc.  
10 Desta Drive, Suite 100W  
Midland, Texas 79705-4500

**RE: ANNUAL SAN JUAN BASIN PIT CLOSURE REPORT  
CONOCO, INC.**

Dear Ms. McLemore:

The New Mexico Oil Conservation Division (OCD) has completed a review of Conoco's March 16, 1994, "CONOCO ANNUAL SUMMARY PIT CLOSURES" and May 14, 1994 "SAN JUAN BASIN GROUNDWATER SAMPLING RESULTS". These documents present the results of Conoco's pit closure activities in the San Juan Basin which were conducted during the 1993 calendar year and the results to Conoco's ground water investigations at the Nye Com 1E, Shepherd Kelsey 1 and Salmon 1 well sites. The documents also request OCD approval of Conoco's proposed remedial actions for contaminated ground water at the Shepherd & Kelsey 1 and Salmon 1 sites and closure of monitor wells at the Nye Com 1E site.

The above referenced ground water remedial action plans for the Shepherd Kelsey 1 and Salmon 1 well sites and monitor well closure at the Nye Com 1E well site are approved with the following conditions:

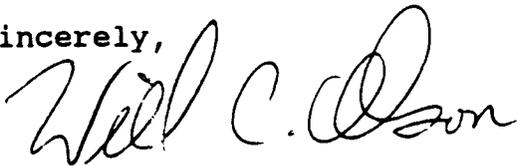
1. Upon removing the casing from the monitor wells at the Nye Com 1E site, the holes will be grouted to the surface with expanding cement.
2. Prior to removing any water from trenches at the Shepherd & Kelsey 1 site, Conoco will notify the OCD and receive approval of the proposed method of disposal of the waters.

Ms. Judy A. McLemore  
May 23, 1994  
Page 2

Please be advised that OCD approval does not relieve Conoco of liability should contamination exist which is beyond the scope of the plan or should the plan fail to adequately remediate contamination related to Conoco's activities. In addition, OCD approval does not relieve Conoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

~~www~~ - OCD Astec Office