

3R - 93

**GENERAL
CORRESPONDENCE**

YEAR(S):

2001-1996

ON SITE
TECHNOLOGIES, LTD.

February 27, 2001

Mr. Bill Olson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

MAY - 7 2001

RE: Pit Remediation & Closure Reports

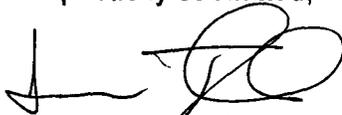
On behalf of Conoco *On Site Technologies Limited Partnership*, is submitting the enclosed Pit Remediation & Closure Reports.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
San Juan 28-7#126	Unit M, S 1, T27N, R7W	Pit Remediation & Closure Report
San Juan 28-7#219	Unit N, S 20, T28N, R7W	Pit Remediation & Closure Report
San Juan 28-7#19	Unit G, S 25, T28N, R7W	Pit Remediation & Closure Report
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Pit Remediation & Closure Report

If there are any questions or concerns on this matter, feel free to contact us at (505) 325-5667.

Thank you for your time and considerations.

Respectfully submitted,



Lawrence "Larry" Trujillo, CHMM
Environmental Specialist
On Site Technologies Limited Partnership

CC:

Gary Ledbetter, SHEAR, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 87401
John Cofer, Sr. Environmental Specialist, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 874
Denny Foust, NMOCD 1000 Rio Brazos, Aztec, NM 87410
Bill Liess, BLM 1235 La Plata HWY, Farmington, NM 87401
File

ON SITE

TECHNOLOGIES, LTD.

February 27, 2001

Mr. Bill Olson
New Mexico Oil Conservation Division,
2040 South Pacheco
Santa Fe, New Mexico 87505

RECEIVED
MAR 22 2001
CONSERVATION DIVISION

RE: Conoco Groundwater Report Summary

On behalf of Conoco *On Site Technologies Limited Partnership*, is submitting the enclosed 2000 Annual Groundwater report for Ten (10) sites.

LOCATION NAME	LEGAL DESCRIPTION	RECOMMENDATION
Farmington B Com 1	Unit H, S 12, T29N, R12W	WSP-1 still has high BTEX, all other at or below NMWQCC standards, continue monitoring of WSP #1
Nell-Hall#1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington C Com 1	Unit L, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Free product is still present in MW-1. Sampling stopped at this time IAW NMOCD direction, more aggressive recovery program being investigated.
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 still has high BTEX, Continue monitoring in accordance with NMOCD letter dated September, 1998.
San Juan 28-7#126	Unit M, S 1, T27N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#219	Unit N, S 20, T28N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
S&K1	Unit L, S 29, T29N, R11W	Research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#19	Unit G, S 25, T28N, R7W	research is being done to complete and submit the Pit closure forms and final reports
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Research is being done to complete and submit the Pit closure forms and final reports
Farmington Com #1	Unit P, Sec 11, T29N, R13W	Monitoring wells and piezometer plug and abandoned IAW NMOCD Letter dated December 13, 2000
Shephard & Kelsey #1E	Unit D, Sec. 29, T29N, R11W	Monitoring wells plug and abandoned IAW NMOCD Letter dated December 14, 2000

PO Box 2606
Farmington, NM 87499

505-325-5667

FAX: 505-327-1496

Conoco Inc.
Summary of 1999 Ground Water Monitoring
On Site Technologies, Ltd.

February 27, 2001

If there are any questions or concerns on this matter, feel free to contact me at (505) 325-5667.

Thank you for your time and considerations.

Respectfully submitted,



Larry Trujillo, CHMM
Environmental Specialist
On Site Technologies Limited Partnership

CC:

Gary Ledbetter, SHEAR, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 87401
John Cofer, Sr. Environmental Specialist, Conoco Inc., 3315 Bloomfield HWY, Farmington, NM 874
Denny Foust, NMOCD 1000 Rio Brazos, Aztec, NM 87410
Bill Liess, BLM 1235 La Plata HWY, Farmington, NM 87401
File



ON SITE
TECHNOLOGIES, LTD.

SEP - 1999

August 9, 1999

Mr. Wm. "Bill" Olsen, Hydrologist
NMOCD

2040 S. PACHECO ST
Santa Fe, NM, 87505

RE: Conoco Groundwater Report Summary

On behalf of Conoco Inc., *On Site Technologies Limited Partnership* requests a status of approval for the corrective actions on the following list of well locations.

RECOMMEND	CONTINUED	MONITORING
Farmington B Com 1	Unit H, S 12, T29N, R12W	WSP-1 still has high BTEX, all other at or below NMWQCC standards, continue monitoring of WSP #1
San Juan 28-7#19	Unit G, S 25, T28N, R7W	Continue monitoring, BTEX levels still above NMWQCC standards
San Juan 28-7#47	Unit A, S 20, T28N, R7W	Continue monitoring, BTEX levels still above NMWQCC standards
Nell-Hall#1	Unit M, S 07, T30N, R11W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington C Com 1	Unit L, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Farmington B Com 1E	Unit O, S 15, T29N, R13W	Continue to monitor as required in NMCOD letter dated September, 1998
Salmon # 1	Unit P, S 30, T29N, R11W	DG#2 still has high BTEX, Continue monitoring in accordance with NMOCD letter dated September, 1998
RECOMMEND	CLOSURE	
San Juan 28-7#126	Unit M, S 1, T27N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure
San Juan 28-7#219	Unit N, S 20, T28N, R7W	4 quarters of sampling below NMWQCC standards, recommend closure
S&K1	Unit L, S 29, T29N, R11W	4 quarters of sampling below NMWQCC standards recommend closure.
Farmington Com 1	Unit P, S 11, T29N, R13W	Contamination level in MW 1 below OCD action levels for the last four quarters, MW2 and MW3 historically have not had any contamination above NMWQCC standards. Recommend closure of the location.
S&K1E	Unit D, S 29, T29N, R11W	4 quarters of sampling below OCD action levels recommend closure.

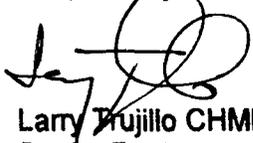
August 9, 1999

Recommendations listed above were included in the 1997 and 1998 Conoco Annual Ground Water Reports. Please advise *On Site* and Conoco of NMOCD's approval, as we are only scheduling the sites requiring continued monitoring.

If there are any questions or concerns on this matter, feel free to contact me at (505) 325-5667.

Thank you for your time and considerations.

Respectfully submitted,



Larry Trujillo CHMM
Senior Environmental Technician
On Site Technologies Limited Partnership

CC:

Shirley Ebert, SHEAR, Conoco Inc., Farmington Office
Neal Goates, Sr. Environmental Specialist, Conoco Inc.



RECEIVED

FEB 19 1999

Letter of Transmittal

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

ATTENTION:

DATE: February 17, 1999

Mr. Bill Olson
New Mexico Oil Conservation Division.
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Conoco's 1998 Annual Groundwater Report

Dear Mr. Olson:
On behalf of Conoco *On Site Technologies Limited Partnership*, is submitting the enclosed 1998 Annual Groundwater report for ten (10) sites.

Number of Originals	Description
1	Shephard & Kelsey #1E Unit D, Sec. 29, T29N, R11W
1	Shephard & Kelsey #1 Unit L, Sec. 29, T29N, R11W
1	Salmon #1 Unit P, Sec. 30, T29N, R7W
1	Nell-Hall #1 Unit, M, Sec 7, T30N, R11W
1	San Juan 28-7-19 Unit G, Sec. 25, T28N, R7W
1	San Juan 28-7-47 Unit A, Sec. 20, T28N, R7W
1	Farmington Com #1 Unit P, Sec 11, T29N, R13W
1	Farmington B Com #1 Unit H, T29N R13W
1	Farmington C Com 1 Unit L, Sec. 15, T29N, R13W
1	Farmington B Com 1E Unit O, Sec 15, T29, R13W

Thank you,

Larry Trujillo
Sr. Environmental Technician

CC:

Shirley Ebert
Neal Goates
Denny Foust
File

PO Box 2606
Farmington, NM

505-325-5667

FAX: 505-327-1496



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

June 5, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-284

Ms. Shirley Ebert
Conoco, Inc.
3315 Bloomfield Hwy.
Farmington, New Mexico 87401

**RE: GROUND WATER INVESTIGATIONS
SAN JUAN BASIN PIT CLOSURES**

Dear Ms. Ebert:

The New Mexico Oil Conservation Division (OCD) has completed a review of Conoco, Inc.'s (Conoco) February 4, 1998 "CONOCO'S 1997 ANNUAL GROUNDWATER REPORT" which was received by the OCD on February 27, 1998. This document, which was submitted on behalf of Conoco by their consultant On Site Technologies, Ltd., contains the results of Conoco's investigation, remediation and monitoring at 12 unlined oil and gas production pit sites with resulting ground water contamination.

Upon a review of the above referenced documents, the OCD has the following comments and requirements:

1. The data in the reports for the sites listed below show that the complete extent of ground water contamination has not been determined. The OCD requires that Conoco complete the definition of the extent of ground water contamination at these sites pursuant to Conoco's prior approved ground water investigation and remediation plan for the San Juan Basin.

- Farmington B Com #1 Unit H, Sec. 12, T29N, R12W.
- Farmington C Com #1 Unit L, Sec. 15, T29N, R13W.
- Farmington Com #1 Unit P, Sec. 11, T29N, R13W.
- Nell-Hall #1 Unit M, Sec. 07, T30N, R11W.
- Salmon #1 Unit P, Sec. 30, T29N, R11W.

2. The ground water metals data for the site listed below shows that the concentrations of barium, chromium and lead in ground water are above the New Mexico Water Quality Control Commission (WQCC) ground water standards. The OCD requires that Conoco conduct additional metals sampling at this site

- Farmington Com #1 Unit P, Sec. 11, T29N, R13W.

Ms. Shirley Ebert
June 5, 1998
Page 2

3. Some of the report site maps do not show the former locations of the pits, the excavated areas nor the locations of all monitor wells (former and current) . The OCD requires that Conoco include this information in future reports.
4. Some of the reports do not contain quarterly ground water potentiometric maps. The OCD requires that Conoco's future reports include ground water potentiometric maps for each sampling event. The maps will be created using the water table elevation in all site monitor wells.
5. Some of the report summary tables do not contain the results of all past water quality sampling. It is difficult for the OCD to evaluate remedial progress at a site without this data. The OCD requires that Conoco's future reports include summary tables that contain the results of all past and present water quality sampling.

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Larry Trujillo, On Site Technologies, Ltd.

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FEB 27 1998

Environmental & OCU
Oil Conservation Division

Letter of Transmittal

ATTENTION:

DATE: February 4, 1998

Mr. Bill Olson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: Conoco's 1997 Annual Groundwater Report.

REMARKS:

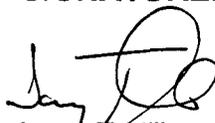
Dear Mr. Olson:

On behalf of Conoco, *On Site Technologies Limited Partnership*, is submitting the enclosed 1997 Annual Groundwater report for the twelve (12) sites

We are sending you:

No. Originals	No. Copies	Description
1		Farmington B Com 1, Unit H, Sec. 12, T29N, R12W
1		San Juan 28-7-19, Unit G, Sec. 25, T28N, R7W
1		San Juan 28-7-47, Unit A, Sec.20, T28N, R7W
1		San Juan 28-7-126, Unit M, Sec.1, T27N, R7W
1		San Juan 28-7-219, Unit N, Sec. 20, T28N, R7W
1		Shephard & Kelsey #1, Unit L, Sec. 29, T29N, R11W
1		Nell-Hall #1, Unit , Sec. 1, T30N, R11W
1		Farmington Com #1, Unit P, Sec. 11, T29N, R13W
1		Farmington C Com #1, Unit L, Sec. 15, T29N, R13W
1		Farmington B Com #1E, Unit O, Sec. 15, T29N, R13W
1		Salmon #1, Unit P Sec. 30, T29N, R11W
1		Shephard & Kelsey 1E, Unit D, Sec. 29, T29W, R11W

SIGNATURE:



Larry Trujillo
Sr. Environmental Technician

CC:

Denny Foust
Shirley Ebert
Neal Goates



ANNUAL SUMMARY

PIT CLOSURES
AND
GROUND WATER IMPACT UPDATES

STATE OF NEW MEXICO
1996

RECEIVED

MAY 20 1997

Environmental Bureau
Oil Conservation Division

*Filed under separate
case files*



Midland Division
Exploration Production

Conoco Inc.
10 Desta Drive, Suite 100W
Midland, TX 79705-4500
(915) 686-5400

Certified Mail
P 895 104 872

April 25, 1997

Mr. Denny Fouts
New Mexico Oil Conservation Commission
1000 Rio Brazos Rd.
Aztec, NM 87410

Dear Mr. Fouts:

Re: NMOCD letters P-471-215-177, P-471-215-178
and P-471-215-179

Reference NMOCD letters of February 18, 1997 (P-471-215-177 and P-471-215-178) directed to Conoco Inc. and NMOCD letter of February 18, 1997 (P-471-215-179) directed to Merrion Oil and Gas Corporation.

This letter is intended to update NMOCD on the progress made to date to evaluate the alleged environmental contamination identified in the subject NMOCD letters. Evaluation work was timely commenced at all sites under Conoco's supervision. Initial results are being documented and evaluated. Where appropriate, possible remediation plans are being considered. As you are aware, ownership of the sites have changed hands several times, and we are in the process of developing proposed plans consistent with the contractual obligations of the successive owners. As soon as reasonably possible, NMOCD will be advised of proposed remediation plans where appropriate, to resolve the environmental matters addressed in the subject NMOCD letters.

Regards,

Carl J. Coy
Field SHEAR Specialist

cc: Merrion
Mesa
Bill Olson - NMOCD Santa Fe

Table of Contents

1	1996 PIT CLOSURE SUMMARY DATA
2	FARMINGTON COM #1
3	FARMINGTON C COM #1
4	FARMINGTON B COM #1E
5	SMITH #1 & DRIP PIT
6	SHEPHERD & KELSEY #1
7	SHEPHERD & KELSEY #1E (DEHY/SEP PIT) PRODUCTION TANK LEAK
8	FARMINGTON B COM #1
9	FEDERAL COM #15
10	SALMON #1
11	NELL HALL #1
12	SAN JUAN 28-7 #19
13	SAN JUAN 28-7 #47
14	SAN JUAN 28-7 #126
15	SAN JUAN 28-7 #219



Revised: May 15, 1997

Conoco, Inc., Midland Division
Exploration and Production, North America
10 Desta Drive, Suite 100W
Midland, Texas 79705-4500

Attn.: Mr. Neal Goates, Senior Environmental Specialist

RE: Transmittal of Information for 1996 Annual NMOCD Reporting

Per your request and at Mr. C. John Coy's (Farmington Office) direction, we have compiled the attached information to assist you with the annual reporting to NMOCD. The information listed in Table 1 is included.

If there are any questions regarding this status report, please contact either Cindy Gray or Myke Lane at On Site Technologies, (505) 325-5667. Thank you for considering On Site to assist you with this matter.

Respectfully submitted,
On Site Technologies Limited Partnership

A handwritten signature in black ink, appearing to read "Michael K. Lane", is written over a horizontal line.

Michael K. Lane, P.E.
Senior Engineer

Enclosures: Table 1 & Listed Attachments

CC: C. John Coy (w/o attachments)
MKL/mki

file: 41303.doc

**TABLE 1: CONCLUSO SUMMARY
Transmittal of Information for 1996 Annual NMOCD Reporting**

On Site Technologies Limited Partnership
May 15, 1997

Project: 4-1303

Well	Date	Documents	Comments
Farmington Com #1	Apr. 18, 97	Site Assessment Brief w/ lab and QA/QC	Corrective Action to address soil and/or ground water contamination pending negotiations with former lease operator.
Farmington C Com #1	Apr. 22, 97	Site Assessment Brief w/ lab and QA/QC	Corrective Action to address soil and/or ground water contamination pending negotiations with former lease operator.
Farmington B Com #1E	Apr. 22, 97	Site Assessment Brief w/ lab and QA/QC	Corrective Action to address soil and/or ground water contamination pending negotiations with former lease operator.
Smith #1 & Drip Pit	Apr. 22, 97	Site Assessment Brief w/ lab and QA/QC	Corrective Action to address soil and/or ground water contamination pending negotiations with former lease operator.
Shepherd & Kelsey #1	Mar. 21, 97 July 18, 96 Mar. 20, 97	Summary of Monitor Well Install & Map Sample Results w/ QA/QC (IML) Sample Results w/ QA/QC (On Site)	Continue ground water monitoring for 3 additional quarters to verify RBCA.
Shepherd & Kelsey #1E (Dehy/Sep Pit)	Apr. 16, 97	Pit Assessment & Remediation Summary w/ lab and QA/QC	No further reclamation efforts recommended, and propose continued ground water monitoring until four consecutive sample events are "clean".
Shepherd & Kelsey #1E (Production Tank Spill)	Apr. 28, 97	Spill Assessment & Remediation Summary w/ lab and QA/QC	No further corrective action, with plug and abandonment of monitor well proposed.
Farmington B Com #1	Apr. 16, 97	Investigation & Remediation Summary w/ lab and QA/QC	No further reclamation efforts recommended, and propose continued ground water monitoring until four consecutive sample events are "clean".
Federal Com #15	Apr. 28, 97	Site Assessment Summary	No further action.
Salmon #1	May 12, 97 July 17, 96 Mar. 18, 96 Mar. 26, 97	Corrective Action Proposal (On Site) Lab Reports & QA/QC (IML) Lab Reports & QA/QC (On Site) Lab Reports & QA/QC (On Site)	Additional excavation and treatment of contaminated soil down-gradient of original pit proposed.

**TABLE 1: CONOCO SUMMARY
Transmittal of Information for 1996 Annual NMOCD Reporting**

On Site Technologies Limited Partnership
May 15, 1997

Project: 4-1303

Well	Date	Documents	Comments
Neil Hall #1	June 14, 97	Lab Reports & QA/QC (IML)	Due to seasonal low water table, propose annual sampling to be scheduled in June to Aug. with closure once two consecutive sample events show "clean".
	June 28, 96	Lab Reports & QA/QC (IML)	
	July 12, 96	Lab Reports & QA/QC (IML)	
	Apr. 1, 97	Letter regarding no water (On Site)	
SJ 28-7 #19	Mar. 12, 96	Lab Reports & QA/QC (IML)	Continue ground water monitoring for four additional quarters.
	July 17, 96	Lab Reports & QA/QC (IML)	
	Mar. 19, 97	Lab Reports & QA/QC (On Site)	
	Apr. 21, 97	Lab Reports & QA/QC (On Site)	
SJ 28-7 #47	Mar. 12, 96	Lab Reports & QA/QC (IML)	Continue ground water monitoring for four additional quarters.
	Apr. 15, 96	Lab Reports & QA/QC (IML)	
	July 17, 96	Lab Reports & QA/QC (IML)	
	Mar. 19, 97	Lab Reports & QA/QC (On Site)	
SJ 28-7 #126	Apr. 21, 97	Lab Reports & QA/QC (On Site)	Continue ground water monitoring for an additional quarter.
	Mar. 12, 96	Lab Reports & QA/QC (IML)	
	July 17, 96	Lab Reports & QA/QC (IML)	
	Mar. 26, 97	Lab Reports & QA/QC (On Site)	
SJ 28-7 #219	Mar. 12, 96	Lab Reports & QA/QC (IML)	Continue ground water monitoring for two additional quarters.
	July 17, 96	Lab Reports & QA/QC (IML)	
	Mar. 26, 97	Lab Reports & QA/QC (On Site)	

'NEW MEXICO PIT DATA
'CONOCO INC.

TYPES OF PITS

- SEP: Separator Pit
- DHP: Blowdown Pit
- CSP: Compressor/ScrubberPit
- TDP: Tank Drip Pit
- LDP: Line Drip Pit
- BGP: Fiberglass Tank Pit
- LDHP: Lined Dehy Pit
- DRP: Drilling Reserve Pit
- NONE: No Pits

WELL NAME AND NUMBER	FEDERAL, STATE INDIAN CONTRACT NO OR FEE	LOCATION	TYPES OF PITS	PIT SIZE	VULN. AREA	EXPANDED VULN. AREA	NON-VULN. AREA	OTHER PARTY PIT	DATE STOPPED FLOW TO PIT	DATE PIT REMEDIATION STARTED	DATE PIT CLOSED
1 Apache No. 1	Contract #98	Unit D, Sec. 18-26N-3W	SEP	30' x 24' x 4'		X			Unknown		05/06/96
2 Apache No. 3E	Contract #98	Unit H, Sec. 19-26N-3W	TDP	18' x 17' x 3'		X			Unknown		04/25/96
3 Apache No. 7	Contract #98	Unit D, Sec. 20-26N-3W	SEP	44' x 30' x 6'		X			Unknown		04/25/96
4 AXI Apache J No. 22	Contract #147	Unit L, Sec. 6-25N-5W	SEP	37' x 36' x 3'		X			09/10/96		09/30/96
5 AXI Apache N No. 14	Contract #121	Unit C, Sec. 1-25N-4W	SEP	19' x 19' x 4'		X			03/27/96		04/15/96
6 AXI Apache N No. 16A	Contract #121	Unit C, Sec. 12-25N-4W	DHP	18'x18'x3'		X			03/18/96		03/26/96
7 Jicarilla No. 3	Contract #12	Unit D, Sec. 31-26N-4W	SEP	28' x 22' x 4'		X			Unknown		08/05/96
8 Jicarilla No. 4	Contract #12	Unit L, Sec. 31-26N-4W	TDP	10' x 8' x 3'		X			Unknown		08/05/96
9 Jicarilla No. 8	Contract #12	Unit L, Sec. 32-26N-4W	SEP	35' x 27' x 4'		X			Unknown		08/15/96
10 Jicarilla No. 11	Contract #12	Unit G, Sec. 30-26N-4W	SEP	21' x 20' x 4'		X			Unknown		08/15/96
11 Jicarilla No. 11	Contract #12	Unit G, Sec. 30-26N-4W	TDP	22' x 22' x 4'		X			Unknown		08/15/96
12 Jicarilla No. 13	Contract #12	Unit G, Sec. 31-26N-4W	TDP	18' x 16' x 4'		X			Unknown		08/05/96
13 Jicarilla No. 14	Contract #12	Unit P, Sec. 31-26N-4W	SEP	19' x 18' x 3'		X			Unknown		08/07/96
14 Jicarilla No. 14	Contract #12	Unit P, Sec. 31-26N-4W	TDP	18' x 17' x 4'		X			Unknown		08/15/96
15 Jicarilla No. 17	Contract #12	Unit B, Sec. 32-26N-4W	SEP	17' x 16' x 4'		X			Unknown		08/15/96
16 Jicarilla No. 17	Contract #12	Unit B, Sec. 32-26N-4W	TDP	19' x 17' x 4'		X			Unknown		08/15/96
17 Jicarilla No. 18	Contract #12	Unit I, Sec. 32-26N-4W	SEP	28' x 22' x 4'		X			Unknown		08/15/96
18 Jicarilla No. 18	Contract #12	Unit I, Sec. 32-26N-4W	TDP	25' x 25' x 4'		X			06/26/96		07/25/96
19 Jicarilla A No. 8	Contract # 105	Unit E, Sec. 23-26N-4W	SEP	10'x10'x5'		X			05/15/96		06/22/96
20 Jicarilla A No. 9	Contract # 105	Unit C, Sec. 14-26N-4W	TDP	10'x10'x5'		X			06/11/96		05/15/96
21 Jicarilla A No. 10	Contract # 105	Unit D, Sec. 23-26N-4W	SEP	16'x16'x4'		X			05/08/96		07/25/96
22 Jicarilla A No. 13	Contract # 105	Unit E, Sec. 23-26N-4W	TDP	16'x16'x4'		X			Unknown		07/25/96
23 Jicarilla B No. 2	Contract # 106	Unit K, Sec. 25-26N-4W	BDP	15'x25'x3'		X			06/06/96		06/26/96
24 Jicarilla B No. 8	Contract # 106	Unit K, Sec. 25-26N-4W	SEP	10'x15'x3'		X			05/22/96		05/31/96
25 Jicarilla B No. 9	Contract # 106	Unit K, Sec. 26-26N-4W	SEP	15'x15'x2'		X			06/10/96		08/15/96
26 Jicarilla B No. 9A	Contract # 106	Unit D, Sec. 26-26N-4W	SEP	18'x18'x3'		X			03/27/96		03/28/96
27 Jicarilla B No. 13	Contract # 106	Unit J, Sec. 36-26N-4W	SEP	16'x18'x4'		X			03/29/96		03/28/96
28 Jicarilla B No. 15	Contract # 106	Unit J, Sec. 36-26N-4W	SEP	12'x12'x2'		X			04/04/96		04/15/96
29 Jicarilla D No. 11	Contract # 100	Unit A, Sec. 29-26N-3W	TDP	12'x14'x4'		X			04/09/96		04/15/96
30 Jicarilla D No. 17	Contract # 100	Unit D, Sec. 29-26N-3W	TDP	16'x18'x3'		X			04/12/96		04/15/96
31 Jicarilla D No. 18	Contract # 100	Unit A, Sec. 30-26N-3W	SEP	15'x15'x2'		X			07/29/96		08/15/96
32 Jicarilla E No. 6	Contract # 104	Unit B, Sec. 21-26N-4W	TDP	18'x18'x3'		X			06/05/96		06/21/96
33 Jicarilla E No. 8	Contract # 104	Unit C, Sec. 15-26N-4W	TDP	10'x10'x3'		X			03/25/96		06/05/96
34 Jicarilla E No. 14	Contract No. 145	Unit D, Sec. 15-26N-4W	CSP	10'x12'x3'		X			Unknown		08/24/96
35 Jicarilla K No. 12E	Contract No. 145	Unit M, Sec. 02-25N-5W	SEP	12'x14'x3'		X			Unknown		08/26/96
36 Jicarilla K No. 15	Contract No. 145	Unit I, Sec. 01-25N-5W	SEP	14'x16'x2'		X			Unknown		10/02/96
37 Jicarilla K No. 22	Contract No. 145	Unit M, Sec. 02-25N-5W	SEP	12'x14'x4'		X			Unknown		08/24/96
38 Jicarilla K No. 22A	Contract No. 145	Unit O, Sec. 02-25N-5W	SEP	10'x10'x01'		X			Unknown		08/24/96

SENSITIVE AREA PITS - JICARILLA

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Attn: *Michael K. Lane*
Company: *On Site Technologies, Ltd. c/o Conoco*
Address: *612 E. Murray Drive*
City, State *Farmington, NM 87401*

Date: *28-Apr-97*
COC No.: *6321*
Sample No.: *14293*
Job No.: *2-1000*

Project Name: **Conoco - San Juan 28-7 #19**
Project Location: **Monitor Well**
Sampled by: *ML* Date: *21-Apr-97* Time: *13:50*
Analyzed by: *DC* Date: *26-Apr-97*
Sample Matrix: *Liquid*

Parameter	Results as Received	Unit of Measure	Limit of Quantitation	Unit of Measure
<i>Benzene</i>	<i>168.2</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>119.6</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>3.7</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>11.4</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>15.6</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>318.5</i>	<i>ug/L</i>		

ND - Not Detected at Limit of Quantitation

Method - *SW-846 EPA Method 8020A Aromatic Volatile Organics by Gas Chromatography*

Approved By: *[Signature]*
Date: *4/28/97*

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

OFF: (505) 325-5667



LAB: (505) 325-1556

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 26-Apr-97

Internal QC No.: 0527-STD

Surrogate QC No.: 0528-STD

Reference Standard QC No.: 0529/30-QC

Method Blank

Parameter	Result	Unit of Measure
Average Amount of All Analytes In Blank	0.2	ppb

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	18.1	10	15%
Toluene	ppb	20.0	18.8	6	15%
Ethylbenzene	ppb	20.0	19.0	5	15%
m,p-Xylene	ppb	40.0	36.9	8	15%
o-Xylene	ppb	20.0	19.0	5	15%

Matrix Spike

Parameter	1- Percent Recovered	2- Percent Recovered	Limit	%RSD	Limit
Benzene	86	84	(39-150)	2	20%
Toluene	89	87	(46-148)	1	20%
Ethylbenzene	90	89	(32-160)	1	20%
m,p-Xylene	89	88	(35-145)	1	20%
o-Xylene	86	85	(35-145)	1	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
14293-6321	99				
					(12) 4/28/97

S1: Fluorobenzene

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Attn: *Micheal Lane*
 Company: *On Site Technologies, Ltd. c/o Conoco*
 Address: *612 E. Murray Drive*
 City, State: *Farmington, NM 87401*

Date: *31-Mar-97*
 COC No.: *5099*
 Sample No.: *14046*
 Job No.: *4-1358*

Project Name: *Conoco - 28-7 #19*

Project Location: *MW-1*

Sampled by: *HR* Date: *26-Mar-97* Time: *15:30*

Analyzed by: *DC* Date: *27-Mar-97*

Sample Matrix: *Liquid*

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i>48.1</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>25.9</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>1.0</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>2.1</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>2.5</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>79.6</i>	<i>ug/L</i>		

Method - *SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved By: *[Signature]*
 Date: *3/31/97*

P.O. BOX 2606 • FARMINGTON, NM 87499

- FURNISHING LABORATORY SERVICES WITH THE...

OFF: (505) 325-5667



LAB: (505) 325-1556

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 27-Mar-97

Internal QC No.: 0527-STD
Surrogate QC No.: 0528-STD
Reference Standard QC No.: 0529/30-QC

Method Blank

Parameter	Result	Unit of Measure
Average Amount of All Analytes In Blank	<0.2	ppb

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	18.6	7	15%
Toluene	ppb	20.0	19.7	2	15%
Ethylbenzene	ppb	20.0	20.0	0	15%
m,p-Xylene	ppb	40.0	38.5	4	15%
o-Xylene	ppb	20.0	22.8	14	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	87	85	(39-150)	1	20%
Toluene	93	91	(46-148)	1	20%
Ethylbenzene	94	92	(32-160)	1	20%
m,p-Xylene	91	89	(35-145)	1	20%
o-Xylene	94	92	(35-145)	1	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
14046-5099	93				

S1: Fluorobenzene

QC

VOLATILE AROMATIC HYDROCARBONS

Conoco, Inc.

Project ID:	Not Given	Report Date:	07/26/96
Sample ID:	28-7 #19 MW1	Date Sampled:	07/17/96
Lab ID:	0396G01348	Date Received:	07/17/96
Sample Matrix:	Water	Date Extracted:	NA
Condition:	Cool/Intact	Date Analyzed:	7/18-25/96

Target Analyte	Concentration (ppb)	Detection Limit (ppb)
Benzene	0.4	0.2
Toluene	0.3	0.2
Ethylbenzene	0.7	0.2
m,p-Xylenes	0.8	0.2
o-Xylene	ND	0.2

ND - Analyte not detected at the stated detection limit.

Quality Control:	<u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
	Bromofluorobenzene	93.4%	75 -125%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, September 1986.

Comments:



Analyst



Review



Environmental Sample Chain of Custody and Log
Research and Engineering

Project Number

Facility Name Conoco	Telephone Number (505) 324-5813	Transporter Name	Telephone Number ()
Facility Address 3315 Bloomfield Hwy	Transporter Address	Transporter Address	
Facility Supervisor John Coy	Method of Shipping		
Process Producing Sample Neal Gates / Brent Dungan	Special Shipping Instructions		
Employee(s) Sampling Neal Gates / Brent Dungan	Remarks		
Other Employee(s) Handling			

Sample I.D. No. and Description	Date	Time	Sample Type	Total Volume	Containers Type	Containers No.	Analysis Req. Preservative
28-7 #47 MW1	7-16-96	9:30am	WTF.	40 ML	Glass	1	HCl 1:1
28-7 #72A-LF	7-16-96	9:45am	soil	8 oz	Glass	1	none
28-7 #72-LF	7-16-96	10:00am	soil	8 oz	Glass	1	none
28-7 #19-MW1	7-16-96	11:00am	WTF.	40 ML	Glass	1	HCl 1:1
28-7 #167 Pit 1	7-16-96	1:00pm	soil	8 oz	Glass	1	none
28-7 #167 Pit 2	7-16-96	1:05pm	soil	8 oz	Glass	1	none
28-7 #167 Pit 3	7-16-96	1:10pm	soil	8 oz	Glass	1	none
28-7 #202 Pit 2	7-16-96	1:45pm	soil	8 oz	Glass	1	none
28-7 #202 Pit 1	7-16-96	1:40pm	soil	8 oz	Glass	1	none
28-7 #67 Pit 1	7-16-96	1:30pm	soil	8 oz	Glass	1	none
28-7 #170 Pit 1	7-16-96	2:30pm	soil	8 oz	Glass	1	none
28-7 #170 Pit 2	7-16-96	2:35pm	soil	8 oz	Glass	1	none
28-7 #122 Pit 1	7-16-96	3:00pm	soil	8 oz	Glass	1	none
28-7 #173 Pit 1	7-16-96	3:30pm	soil	8 oz	Glass	1	none
28-7 #173 Pit 2	7-16-96	3:35pm	soil	8 oz	Glass	1	none
28-7 #173 Pit 3	7-16-96	3:40pm	soil	8 oz	Glass	1	none
28-7 #196 Pit 1	7-16-96	4:30pm	soil	8 oz	Glass	1	none
28-7 #196 Pit 2	7-16-96	4:35pm	soil	8 oz	Glass	1	none
28-7 #120 MW1	7-16-96	5:45pm	WTF.	40 ML	Glass	1	HCl 1:1

Condition of Samples Upon Arrival at Final Destination	Date/Time
	7-17-96 10:30

Signatures	Date/Time	Signature	Date
Relinquished by <i>B. Gates</i>	7/17/96 8:30am	<i>Chris Raymond</i>	
Relinquished by			

Temp. of Samples on Arrival (Temp. sensitive analysis only)	Date/Time	Signature	Date

ANALYZING LAB COPY

TOTAL PETROLEUM HYDROCARBONS
Quality Assurance/Quality ControlClient: **Conoco, Inc.**
Project: Not Given
Matrix: Soil
Condition: Intact/CoolDate Reported: 07/26/96
Date Sampled: 07/16/96
Date Received: 07/17/96
Date Extracted: 07/19/96
Date Analyzed: 07/19/96

Duplicate Analysis

Lab ID	Sample Result	Duplicate Result	Units	% Difference
0396G01350	822	784	mg/Kg	4.8%

Method Blank Analysis

Lab ID	Result	Units	Detection Limit
Method Blank	ND	mg/Kg	20

Spike Analysis

Lab ID	Found Conc. mg/Kg	Sample Conc. mg/Kg	Spike Amount mg/Kg	Percent recover	Acceptance Limits
0396G01350	975	883	200	77%	70-130%

Known Analysis

Lab ID	Found Conc. mg/Kg	Known Conc. mg/Kg	Percent recover	Acceptance Limits
QC	20.1	20.6	98%	70-130%

References: **Method 418.1:** Petroleum Hydrocarbons, Total Recoverable, USEPA Chemical Analysis of Water and Waste, 1978.**Method 3550:** Ultrasonic Extraction of Non-Volatile and Semi-Volatile Organic Compounds from Solids, USEPA SW-846, Rev. 1, July 1992.Analyst: OKReviewed: JB

TOTAL PETROLEUM HYDROCARBONS
Quality Assurance/Quality Control

Client: **Conoco, Inc.**
Project: Not Given
Matrix: Soil
Condition: Intact/Cool

Date Reported: 07/26/96
Date Sampled: 07/16/96
Date Received: 07/17/96
Date Extracted: 07/19/96
Date Analyzed: 07/19/96

Duplicate Analysis

Lab ID	Sample Result	Duplicate Result	Units	% Difference
0396G01360	324	311	mg/Kg	4.0%

Method Blank Analysis

Lab ID	Result	Units	Detection Limit
Method Blank	ND	mg/Kg	20

Spike Analysis

Lab ID	Found Conc. mg/Kg	Sample Conc. mg/Kg	Spike Amount mg/Kg	Percent recover	Acceptance Limits
0396G01360	516	324	250	77%	70-130%

Known Analysis

Lab ID	Found Conc. mg/Kg	Known Conc. mg/Kg	Percent recover	Acceptance Limits
QC	20.1	20.6	98%	70-130%

References: **Method 418.1:** Petroleum Hydrocarbons, Total Recoverable, USEPA Chemical Analysis of Water and Waste, 1978.

Method 3550: Ultrasonic Extraction of Non-Volatile and Semi-Volatile Organic Compounds from Solids, USEPA SW-846, Rev. 1, July 1992.

Analyst: dt

Reviewed: JB

Quality Control / Quality Assurance**Known Analysis****BTEX**Client: Conoco, Inc.
Project: Not GivenDate Reported: 07/26/96
Date Analyzed: 07/18/96**Known Analysis**

Parameter	Found Concentration (ppb)	Known Concentration (ppb)	Percent Recovery	Acceptance Limits
Benzene	6.5	6.0	108%	70-130%
Toluene	7.3	6.0	121%	70-130%
Ethylbenzene	6.6	6.0	110%	70-130%
m+p-Xylene	11.6	12.0	97%	70-130%
o-Xylene	7.1	6.0	118%	70-130%

Quality Control:	<u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
	Bromofluorobenzene	82.5%	75-125%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, September 1986.

Comments:Reported by dkReviewed by JB

VOLATILE AROMATIC HYDROCARBONS
QUALITY CONTROL REPORTMethod Blank AnalysisSample Matrix:
Lab ID:Water
Method BlankReport Date:
Date Analyzed:07/26/96
07/18/96

Target Analyte	Concentration (ppb)	Detection Limit (ppb)
Benzene	ND	0.2
Toluene	ND	0.2
Ethylbenzene	ND	0.2
m,p-Xylenes	ND	0.2
o-Xylene	ND	0.2

ND - Analyte not detected at the stated detection limit.

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Bromofluorobenzene	96.5%	75-125%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, September 1986.

Comments:



Analyst

Review

AROMATIC VOLATILE ORGANICS

Client: CONOCO
Project Name: NA
Sample ID: SJ 28-7 #19
Sample Number: 039600352 / 0696G00468
Sample Matrix: Water
Preservative: Cool, HCl
Condition: Intact, pH < 2
Report Date: 03/20/96
Date Sampled: 03/12/96
Date Received: 03/20/96
Date Extracted: 03/20/96
Date Analyzed: 03/20/96
Time Analyzed: 12:44 PM

Analyte	Concentration (mg/L)	Detection Limit (mg/L)
Benzene	0.014	0.01
Toluene	0.012	0.01
Ethylbenzene	0.011	0.01
p,m-xylene	0.078	0.01
o-xylene	ND	0.01

ND - Analyte not detected at stated detection limit.

Quality Control:

Surrogate	Percent Recovery	Acceptance Limits
a,a,e-Trifluorotoluene	106%	75 - 125%
Bromofluorobenzene	103%	70 - 120%

Reference:

Method 5030A, Purge and Trap.
Method 8020A, Aromatic Volatile Organics.
SW-846, Test Methods for Evaluating Solid Waste, United States
Environmental Protection Agency, Final Update II, September 1994.

Comments:

Elevated detection limits due to high levels of other compounds.

Not a result
Analyst

Ramona R. Daniels
Review



Inorganics Laboratory
11183 SH 30 College Station, Texas 77845
Phone (409) 776-8945 Fax (409) 774-4705

Organics Laboratory
3304 Longmire Drive College Station, Texas 77845
Phone (409) 774-4999 Fax (409) 696-0962

QUALITY CONTROL REPORT - METHOD BLANK
VOLATILE AROMATIC HYDROCARBONS

Sample Number MB0320
Sample Matrix: Water

Report Date: 03/20/96
Date Analyzed: 03/20/96
Time Analyzed: 10:04 AM

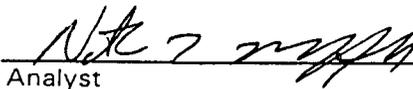
Analyte	Concentration (mg/L)	Detection Limit (mg/L)
Benzene	ND	0.001
Toluene	ND	0.001
Ethylbenzene	ND	0.001
p,m-xylene	ND	0.001
o-xylene	ND	0.001

ND - Analyte not detected at stated detection limit

Quality Control: <u>Surrogate</u>	<u>Percent Recovery</u>	<u>Acceptance Limits</u>
a,a,a-Trifluorotoluene	102%	75 - 125%
Bromofluorobenzene	99%	70 - 120%

Reference: Method 5030A, Purge and Trap.
Method 8020A, Aromatic Volatile Organics.
SW-846, Test Methods for Evaluating Solid Waste, United States
Environmental Protection Agency, Final Update II, September 1994.

Comments:


Analyst


Review



Inorganics Laboratory
11183 SH 30 College Station, Texas 77845
Phone (409) 776-8945 Fax (409) 774-4705

Organics Laboratory
3304 Longmire Drive College Station, Texas 77845
Phone (409) 774-4999 Fax (409) 696-0962

QUALITY CONTROL REPORT - BLANK SPIKE
VOLATILE AROMATIC HYDROCARBONS

Sample Number: Blank Spike
Sample Matrix: Water

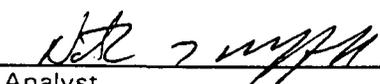
Report Date: 03/20/96
Date Extracted: 03/20/96
Date Analyzed: 03/20/96
Time Analyzed: 2:34 PM

Analyte	Spike Added ppb	Sample Result ppb	Spike Result ppb	Percent Recovery	Acceptance Limit
Benzene	0.020	ND	0.021	105%	39-150%
Toluene	0.020	ND	0.021	104%	46-148%
Ethylbenzene	0.020	ND	0.020	102%	32-160%
m-Xylene	0.020	ND	0.021	104%	50-150%
o-Xylene	0.020	ND	0.020	102%	50-150%

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	a,a,a-Trifluorotoluene	100%	75 - 125%
	Bromofluorobenzene	105%	70 - 120%

Reference: Method 5030A, Purge and Trap.
Method 8020A, Aromatic Volatile Organics.
SW-846, Test Methods for Evaluating Solid Waste, United States
Environmental Protection Agency, Final Update II, September 1994.

Comments:


Analyst


Review



Inorganics Laboratory
11183 SH 30 College Station, Texas 77845
Phone (409) 776-8945 Fax (409) 774-4705

Organics Laboratory
3304 Longmire Drive College Station, Texas 77845
Phone (409) 774-4999 Fax (409) 696-0962

QUALITY CONTROL REPORT - BLANK SPIKE DUPLICATE
VOLATILE AROMATIC HYDROCARBONS

Sample Number: Blank Spike Duplicate
Sample Matrix: Water

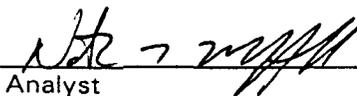
Report Date: 03/20/96
Date Extracted: 03/20/96
Date Analyzed: 03/20/96
Time Analyzed: 3:15 PM

Analyte	Spike Recovery (%)	Duplicate Recovery (%)	Percent Difference
Benzene	105%	109%	3%
Toluene	104%	108%	4%
Ethylbenzene	102%	107%	4%
m-Xylene	104%	109%	4%
o-Xylene	102%	107%	4%

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	a,a,a-Trifluorotoluene	101%	75 - 125%
	Bromofluorobenzene	102%	70 - 120%

Reference: Method 5030A, Purge and Trap.
Method 8020A, Aromatic Volatile Organics.
SW-846, Test Methods for Evaluating Solid Waste, United States Environmental Protection Agency, Final Update II, September 1994.

Comments:



Analyst



Review



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

January 31, 1997

CERTIFIED MAIL

RETURN RECEIPT NO. P-269-269-243

Mr. Neal Goates
Conoco Inc.
10 Desta Drive, Suite 100W
Midland, Texas 79705-4500

**RE: GROUND WATER CONTAMINATION ASSESSMENT
SAN JUAN 28-7 UNIT
WELLS #219, #47, #19, #126**

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following Conoco documents:

- October 15, 1996 "GROUNDWATER ASSESSMENT PROPOSAL, SAN JUAN 28-7 WELLS #219 (S20, TNW28 R7W UNIT A), #47 (S20 TNW28 R7W UNIT A), #19 (S25, TNW28, R7W UNIT G), #126 (S1 TNW28 R7W UNIT M)".
- Undated "CONOCO SAN JUAN 28-7 LEASE, WELLS 219, 19, 47, 126" which was received by the OCD on September 16, 1996.

These documents contain the results of Conoco's investigation of the extent of contamination resulting from disposal of production wastes in unlined pits at Conoco's San Juan 28-7 Unit wells #219 (Unit N, Sec. 20, T28N, R07W), #47 (Unit A, Sec. 20, T28N, R07W), #19 (Unit G, Sec. 25, T28N, R07W) and #126 (Unit M, Sec. 01, T27N, R7W). The documents also contain recommendations for ground water quality monitoring of the existing monitor wells until New Mexico Water Quality Control Commission (WQCC) ground water standards are met and installation of no further monitor wells based upon the results of a risk assessment.

The OCD's review of the above referenced documents is addressed below.

A. Based upon the current non-detectable concentrations of petroleum compounds at the San Juan 28-7 Unit wells #219, #19 and #126, Conoco's recommendations for these sites are approved with the following conditions:

1. All ground water sampling and analysis will be conducted using EPA approved methods.

Mr. Neal Goates
January 31, 1997
Page 2

2. While site monitoring is ongoing, Conoco will submit a separate annual report for each site to the OCD by April 1 of each year. The reports will contain:
 - a. A description of the monitoring activities during the past year including conclusions and recommendations.
 - b. A summary of past and present analytical results of all ground water monitoring for each site including copies of the laboratory analyses and associated quality assurance/quality control data.
3. Ground water quality monitoring will not be considered complete until water quality samples from the monitor wells are shown to be below WQCC standards for four (4) consecutive quarters.
4. Upon completion of ground water actions, Conoco will submit to the OCD for approval final pit closure reports for each site which will contain the results of all remedial actions and monitoring.

Please be advised that OCD approval does not relieve Conoco of liability if implementation of the recommendations fails to adequately monitor ground water contamination at the sites. In addition, OCD approval does not relieve Conoco of responsibility for compliance with any other federal, state, tribal or local laws and/or regulations.

- B. Due to concentrations of benzene in ground water in excess of WQCC standards at the San Juan Unit 28-7 well #47, the OCD defers approval of Conoco's recommendations for this site until Conoco provides the OCD with actual field data which verifies the model results. The field verification data will be submitted to the OCD by March 28, 1997.

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



Midland Division
Exploration Production

Conoco Inc.
10 Desta Drive, Suite 100W
Midland, TX 79705-4500
(915) 686-5400

October 15, 1996

William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Olson:

GROUNDWATER ASSESSMENT PROPOSAL, SAN JUAN 28-7 WELLS #219 (S20, TNW28 R7W UNIT A), #47 (S20 TNW28 R7W UNIT A), #19 (S25, TNW28, R7W UNIT G), #126 (S1 TNW28 R7W Unit M).

INTRODUCTION

This letter is the follow up recommendation after the meeting between Conoco and the NMOCD held on September 16, 1996. Please disregard previous letter dated October 1. During the course of pit assessment work in the expanded vulnerable area Conoco identified groundwater contamination at these sites. Please note that the site investigation went beyond NMOCD's proposed scope of phase II assessment in determining vertical extent of the contamination outlined in **Section II SOIL AND WATER REMEDIATION LEVELS** subheading **A SOILS part 2b Recommended Remediation Level.**

RECOMMENDATION

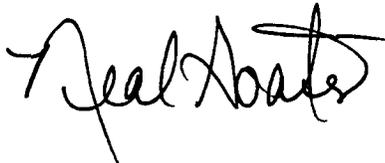
Please attach this letter with the risk assessment work completed for the subject properties. Based on the risk analysis output, Conoco recommends that no additional monitoring wells will be needed. The Tier 1 lookup table values indicates that wells 219, 19, and 126 are below the Risk-Based Screening Level for Benzene. In addition, Tier II modeling for well 47 clearly demonstrates that off-site transport is not a concern and concentration of Benzene for anticipated use of area would not be a future health threat for residential use of the property. Conoco will utilize our existing monitor wells located adjacent and down gradient of the original pit locations for progress toward natural biodegradation. We will sample the monitor wells for BTEX content on an annual basis and forward the results with our annual pit closure progress report. The sites will seek individual approval for closure when the BTEX analysis results are below the MCL for each constituent of concern for a minimum of two sample events within the frequency of one full year. The soil within the pit area will be delineated and remediated using the current approved methods for pit closure (OVM screening, excavation, surface remediation, analytical based closure).

WORK SUMMARY

With the assistance of Western Technologies boring crew and geologist, our Conoco representative organized the task of determine the subsurface vertical extent of the soil contamination by the use of a geoprobe adjacent and down gradient from the unlined surface impoundment and sampled with a calibrated PID meter in accordance with Sections V-IX. The subjects soil contamination surpassed the closure guidelines of 100 ppm and also exceeded the vertical limits of the geoprobe at 40'. It was

decided by our site supervisor to continue the borings with a hollow stem auger regardless of formation changes (sandstone) until such drilling was impeded, OVM readings were extensively below 100 ppm, or groundwater was encountered. The monitor wells were completed according to OCD requirements and adequately purged for water analysis. The analysis concluded that BTEX readings exceeded the closure standard set by the New Mexico WQCC. The attached logs define the PID readings corrected for Benzene and complete analysis accompany the risk assessment report.

Sincerely,



Neal Goates
Environmental Specialist

cc: Denny Foust, OCD Aztec Office
John Coy, Conoco Farmington



Midland Division
Exploration Production

Conoco Inc.
10 Desta Drive, Suite 100W
Midland, TX 79705-4500
(915) 686-5400

106 00 17 17 0 52

October 1, 1996

William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

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Sincerely,

A handwritten signature in black ink that reads "Neal Goates". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Neal Goates
Environmental Specialist

cc: Denny Foust, OCD Aztec Office
John Coy, Conoco Farmington



SAN JUAN 28-7 LEASE

WELLS 219, 19, 47, 126

RECEIVED

SEP 16 1996

Environmental Bureau
Oil Conservation Division

*Report filed
in San Juan 28-7
Well #47
Ground Water
Case file*