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APPROVALS

YEAR(S):

2001 - 1997



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

August 30, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5357-7904

Mr. John E. Cofer
Conoco, Inc.
3315 Bloomfield Hwy.
Farmington, New Mexico 87401

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Mr. Cofer:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco Inc's (Conoco) February 27, 2000 "PIT REMEDIATION & CLOSURE REPORTS" and accompanying pit closure reports which were submitted on behalf of Conoco by their consultant On Site Technologies, Ltd. These documents contain 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 4 sites.

Below is the OCD's review of the above referenced documents:

A. The soil and ground water remedial activities conducted at the sites listed below 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 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.

- | | | |
|----|-----------------------------------|------------------------------|
| 1. | San Juan 28-7 #19 (Blowdown pit) | Unit G, Sec. 25, T28N, R07W. |
| 2. | San Juan 28-7 #47 (Blowdown pit) | Unit A, Sec. 20, T28N, R07W. |
| 3. | San Juan 28-7 #219 (Blowdown pit) | Unit N, Sec. 20, T28N, R07W. |

B. The ground water remedial actions at the site listed below appear satisfactory. However, the pit closure form for this site does not contain any information on soil remediation actions including the disposal of contaminated soils generated at the site and the soil landfarm results. Therefore, final closure approval for this site is **denied**. The OCD will reconsider issuing closure approval once Conoco submits a completed OCD "Pit Remediation and Closure Report" form which includes the above information.

1. San Juan 28-7 #126 (Dehy/seperator pit) Unit M, Sec. 01, T27N, R07W.

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
Bill Liess, BLM Farmington District Office
Larry Trujillo, 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

July 28, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-198

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

RE: ANNUAL PIT CLOSURE SUMMARY AND GROUND WATER IMPACTS

Dear Mr. Goates:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco's undated "ANNUAL PIT CLOSURES AND GROUND WATER IMPACT UPDATES, STATE OF NEW MEXICO, 1996" which was received by the OCD on May 20, 1997. This document contains the results of Conoco's recent work on the investigation and remediation of contamination from unlined production pits in the San Juan Basin. The document also contains Conoco's recommendations for future remedial actions.

The recommendations as contained in the above referenced document are approved with the following conditions:

1. **General Conditions**
 - a. The ground water reports for each site do not include the cations/anions, metals and PAH ground water sample analyses that were supposed to be taken at each site. The OCD requires that Conoco conduct this sampling pursuant to Conoco's March 24, 1995 San Juan Basin ground water assessment plan which was conditionally approved by the OCD on April 5, 1995. The results of these analyses will be included in subsequent annual reports.

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July 28, 1997
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- b. Upon review of Conoco's file, the OCD noted that Conoco does not have a long term ground water monitoring plan nor a ground water remediation plan for pit closure sites with ground water contamination. The OCD requires that Conoco submit a comprehensive ground water remediation plan and long term ground water monitoring plan to the OCD by October 10, 1997.
 - c. All future annual ground water reports will be submitted to the OCD by March 1 of each respective year. The ground water reports will present the information on each site as a separate case. Each ground water case report will contain:
 - I. A brief summary of all ground water remediation and monitoring activities which occurred during the prior calendar year.
 - ii. Summary tables of all past and present ground water quality sampling analytical results and copies of the laboratory analytical data sheets for samples taken during the last year.
 - iii. A site map showing the locations of relevant site features (ie. wellhead, pit, monitor wells, etc.)
 - iv. A quarterly ground water potentiometric map using the water table elevation in all site monitor wells.
 - v. A geologic log and well completion diagram for each monitor well.
2. Farmington Com #1, Farmington C Com #1, Farmington B Com #1E and Farmington B Com #1

Due to the potential for public impacts from soil and ground water contamination at these sites, the OCD requires that Conoco conduct the following actions:

- a. By August 29, 1997, Conoco will complete the remediation of contaminated soils at each site according to Conoco's previously approved pit closure plan. Final reports containing the results of the soil remedial actions will be submitted to the OCD by September 26, 1997.
- b. By August 29, 1997, Conoco will submit a ground water remediation work plan for each site to the OCD. The work plan will include information on how Conoco plans to remediate the contaminated ground water, a long term ground water monitoring plan, an implementation schedule and, if not already completed, a plan to define the full extent of ground water contamination at each site.

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3. Shepherd & Kelsey #1E (Separator pit)

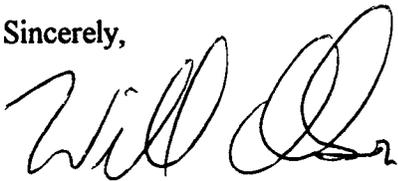
The report recommends no further actions except additional ground water monitoring for this site. However, a review of the report data shows that the extent of ground water contamination at this site has not been determined. Therefore, the OCD requires that Conoco investigate the extent of ground water contamination pursuant to Conoco's March 24, 1995 San Juan Basin ground water assessment plan which was conditionally approved by the OCD on April 5, 1995.

To simplify the approval process for both Conoco and OCD, the OCD requests that future annual reports only address the ongoing actions related to ground water investigation, remediation and monitoring. Pit closure actions involving only contaminated soils need to be reported to the OCD only upon completion of all pit soil remedial actions when Conoco submits a final pit closure report to the OCD for approval. Pit closure actions involving only contaminated soils do not need to be reported to the OCD on an interim basis.

Please be advised that OCD approval does not relieve Conoco of liability if remaining contaminants pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve Conoco of responsibility for any federal, state, tribal, or local laws and/or regulations.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
John Andersen, Conoco, Inc.
Robert J. Bowie, City of Farmington



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
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2. While site monitoring is ongoing, Conoco will submit a separate annual report for each site to the OCD by April 1 or 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