

3R - 96

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

1999-1996



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

September 28, 1999

Ms. Shirley Ebert  
Conoco, Inc.  
10 Desta Dr., Suite 100W  
Midland, Texas 79705-4500

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

Dear Ms. Ebert:

The New Mexico Oil Conservation Division (OCD) has reviewed Conoco's August 9, 1999 "CONOCO GROUNDWATER REPORT SUMMARY" which was received by the OCD on September 11, 1999. This document which was submitted on behalf of Conoco by their consultant On Site Technologies, Ltd. requests the status of approval of the corrective actions at a number of pit sites in the San Juan Basin.

A review of the case files on these sites shows there have been recommendations from On Site Technologies to Conoco that Conoco seek closure of the remedial actions at some of the sites. However, the OCD has no record of receiving any closure requests from Conoco. If Conoco wishes to seek closure of the pits at these sites, Conoco will need to submit a completed OCD "Pit Remediation and Closure Report" form for each site. The report should include the results of all soil and ground water remediation actions and information on the current operator of the site.

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.



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.

PO Box 2606  
Farmington, NM

505-325-5667

FAX: 505-327-1496

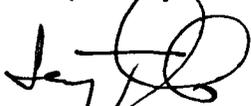
August 9, 1999

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.



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.
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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.

**RECEIVED**

FEB 27 1998

Environmental Bureau  
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

*Each site  
filed under  
case files separate*



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

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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

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<b>3</b>	FARMINGTON C COM #1
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<b>5</b>	SMITH #1 & DRIP PIT
<b>6</b>	SHEPHERD & KELSEY #1
<b>7</b>	SHEPHERD & KELSEY #1E (DEHY/SEP PIT) PRODUCTION TANK LEAK)
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<b>15</b>	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/mkl

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
Nell 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: Dehydrator Pit  
CSP: Compressor/Scrubber Pit  
LDP: Line Drip Pit  
BDP: Blowdown Pit  
FGP: 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			Unknown		07/25/96
19	Jicarilla A No. 8	Contract # 105	Unit E, Sec. 23-26N-4W	SEP	10'x10'x5'		X			06/26/96		05/15/96
20	Jicarilla A No. 9	Contract # 105	Unit C, Sec. 14-26N-4W	TDP	10'x10'x5'		X			05/15/96		06/22/96
21	Jicarilla A No. 10	Contract # 105	Unit D, Sec. 23-26N-4W	SEP	16'x16'x4'		X			06/11/96		05/15/96
22	Jicarilla A No. 13	Contract # 105	Unit E, Sec. 13-26N-4W	TDP	16'x16'x4'		X			05/08/96		07/25/96
23	Jicarilla B No. 2	Contract # 106	Unit K, Sec. 25-26N-4W	BDP	15'x25'x3'		X			Unknown		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			06/10/96		03/29/96
27	Jicarilla B No. 13	Contract # 106	Unit M, Sec. 36-26N-4W	SEP	16'x18'x4'		X			03/27/96		03/29/96
28	Jicarilla B No. 15	Contract # 106	Unit J, Sec. 36-26N-4W	TDP	12'x12'x2'		X			03/29/96		04/15/96
29	Jicarilla D No. 11	Contract # 100	Unit A, Sec. 29-26N-3W	TDP	12'x14'x4'		X			04/04/96		04/15/96
30	Jicarilla D No. 17	Contract # 100	Unit A, Sec. 29-26N-3W	TDP	16'x18'x3'		X			04/12/96		04/15/96
31	Jicarilla D No. 18	Contract # 100	Unit D, 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 # 104	Unit D, Sec. 15-26N-4W	CSP	10'x12'x3'		X			Unknown		09/24/96
35	Jicarilla K No. 12E	Contract No. 145	Unit M, Sec. 02-25N-5W	SEP	12'x14'x3'		X			08/26/96		09/03/96
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		09/24/96
38	Jicarilla K No. 22A	Contract No. 145	Unit O, Sec. 02-25N-5W	SEP	10'x10'x01'		X			Unknown		09/24/96

SENSITIVE AREA PITS - JICARILLA

39	Tribal No. 2	Fed. 6090001150	Unit L, Sec. 9-26N-3W	SEP	30' x 24' x 6'					Unknown		05/06/96
40	Tribal No. 2	Fed. 6090001150	Unit L, Sec. 9-26N-3W	TDP	24' x 17' x 4'				X	Unknown		05/06/96

NON - SENSITIVE AREA PITS - JICARILLA

1	AXI Apache N No. 11A	Contract #121	Unit B, Sec. 12-25N-4W	SEP	22' x 19' x 3'					Unknown		03/22/96
2	AXI Apache N No. 12A	Contract #121	Unit L, Sec. 11-25N-4W	SEP	21' x 21' x 4'				X	03/22/96		03/29/96
3	AXI Apache N No. 14A	Contract #121	Unit K, Sec. 1-25N-4W	SEP	19'x19'x3'				X	Unknown		03/22/96
4	AXI Apache N No. 12	Contract #121	Unit C, Sec. 11-25N-4W	SEP	20' x 18' x 3'				X	03/25/96		03/26/96
5	AXI Apache N No. 13	Contract #121	Unit G, Sec. 2-25N-4W	SEP	22' x 21' x 3'				X	03/25/96		03/29/96
6	AXI Apache O No. 10	Contract #122	Unit J, Sec. 3-25N-4W	SEP	23' x 21' x 3'				X	03/20/96		03/25/96
7	Jicarilla D No. 11A	Contract # 100	Unit P, Sec 29-26N-3W	TDP	16'x16'x3'				X	04/19/96		04/22/96
8	Jicarilla D No. 13	Contract # 100	Unit A, Sec 32-26N-3W	TDP	15'x15'x2'				X	04/16/96		04/22/96
9	Jicarilla D No. 13A	Contract # 100	Unit P, Sec 32-26N-3W	SEP	20'x20'x2'				X	04/15/96		04/22/96
10	Jicarilla D No. 19	Contract # 100	Unit I, Sec 31-26N-3W	TDP	25'x28'x2'				X	04/25/96		05/03/96
11	Jicarilla D No. 20	Contract # 100	Unit N, Sec 31-26N-3W	TDP	20'x30'x4'				X	04/25/96		05/03/96



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:

**GOUNDWATER 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 utilized 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

06 00 17 00 0 52

October 1, 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).**

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Sincerely,

A handwritten signature in black ink, appearing to read "Neal Goates". The signature is written in a cursive, flowing style with some loops and flourishes.

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*