

3R - 114

APPROVALS

YEAR(S):

2000 - 1997



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

December 14, 2000

CERTIFIED MAIL

RETURN RECEIPT NO: 5051-3983

Ms. Nina Hutton
Cross Timbers Oil Company
810 Houston St., Suite 2000
Fort Worth, Texas 76102-6298

RE: PIT CLOSURE/GROUND WATER MONITORING REPORTS

Dear Ms. Hutton:

The New Mexico Oil Conservation Division (OCD) has reviewed Cross Timbers Oil Company's (CTOC) February 21, 2000 "1999 ANNUAL GROUNDWATER REPORTS, SAN JUAN COUNTY, NEW MEXICO, PERMANENT CLOSURE REQUESTED" which was submitted on behalf of CTOC by their consultant Blagg Engineering, Inc. This document contains the results of CTOC's investigation, remediation and monitoring of soil and ground water contamination related to the disposal of oilfield wastes in unlined pits at 10 sites in the San Juan Basin and requests closure of the remedial actions.

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

A. The soil and ground water remedial actions at the sites listed below are satisfactory and the OCD **approves** of the closure of these pit sites. Please be advised that OCD approval does not relieve CTOC 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 CTOC of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

- | | | |
|----|---------------------------------|------------------------------|
| 1. | Hare GC C #1 (Blow pit) | Unit M, Sec. 25, T29N, R10W. |
| 2. | Pearce GC #1E (Blow pit) | Unit J, Sec. 23, T29N, R11W. |
| 3. | Sanchez GC #1 (Blow pit) | Unit G, Sec. 28, T29N, R10W. |
| 4. | Texas National GC #1 (Blow pit) | Unit L, Sec. 19, T29N, R09W. |

B. The sites listed below were initially found to have ground water contaminated with benzene, toluene, ethylbenzene and xylene (BTEX) in excess of New Mexico Water Quality Control Commission (WQCC) standards. The reports for these sites contain only one subsequent round of water quality sampling events demonstrating that ground water currently meets WQCC standards. CTOC's approved ground water management plan required that all sites contaminated in excess of the WQCC standards would not be submitted for final closure until ground water quality at all monitoring points were below WQCC standards for a minimum of 4 consecutive quarters. Therefore, approval of the closure actions at these sites is **denied**. The OCD requires that CTOC continue ground water quality monitoring at these sites. Pursuant to the previously approved ground water management plan, the OCD will reconsider issuing final closure approval after CTOC demonstrates that ground water quality at all monitoring points are below WQCC standards for a minimum of 4 consecutive quarters.

In addition, the OCD could not find that any analytical results have been submitted for the landfarm activities at the Haney GC B#1E site. Please include these results in all future final closure requests.

- | | | |
|----|------------------------------------|------------------------------|
| 1. | Baca GC A #1A (Blow/separator pit) | Unit F, Sec. 26, T29N, R10W. |
| 2. | Haney GC B#1E (Separator pit) | Unit M, Sec. 20, T29N, R10W. |
| 3. | Masden GC #1E (Blow pit) | Unit D, Sec. 28, T29N, R11W. |
| 4. | McDaniel GC B#1E (Dehy pit) | Unit F, Sec. 26, T29N, R10W. |
| 5. | Snyder GC #1A (Blow pit) | Unit E, Sec. 19, T29N, R09W. |
| 6. | Sullivan Frame A#1E (Dehy pit) | Unit A, Sec. 30, T29N, R10W. |

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Nelson Velez, Blagg Engineering, 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

April 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO: Z-274-520-642

Ms. Nina Hutton
Cross Timbers Oil Company
810 Houston St., Suite 2000
Fort Worth, Texas 76102-6298

RE: PIT CLOSURE/GROUND WATER MONITORING REPORTS

Dear Ms. Hutton:

The New Mexico Oil Conservation Division (OCD) has reviewed Cross Timbers Oil Company's (CTOC) February 17, 1999 "CROSS TIMBERS OIL CO. (AMOCO) PIT CLOSURE/GROUNDWATER MONITORING REPORTS, SAN JUAN COUNTY, NEW MEXICO" which was submitted on behalf of CTOC by their consultant Blagg Engineering, Inc. This document contains the results of CTOC's investigation, remediation and monitoring of ground water contamination related to the disposal of oilfield wastes in unlined pits at 20 sites in the San Juan Basin and requests closure of the remedial actions.

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

- A. The soil and ground water remedial actions at the sites listed below are satisfactory and the OCD **approves** of the closure of these pit sites. Please be advised that OCD approval does not relieve CTOC of liability if remaining contaminants pose a future threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve CTOC of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

- | | | |
|-----|-------------------------------------|------------------------------|
| 1. | Abrams GC C #1 (Blow pit) | Unit F, Sec. 25, T29N, R10W. |
| 2. | Anderson GC A#1(Blow pit) | Unit C, Sec. 28, T29N, R10W. |
| 3. | Armenta GC A#1 (Blow pit) | Unit D, Sec. 27, T29N, R10W. |
| 4. | Baca GC A#1 (Blow pit) | Unit H, Sec. 26, T29N, R10W. |
| 5. | Baca GC A#1 (Dehy pit) | Unit H, Sec. 26, T29N, R10W. |
| 6. | Chavez GC C#1R (Blow/seperator pit) | Unit J, Sec. 23, T29N, R10W. |
| 7. | Federal GC 3-1 (Blow pit) | Unit N, Sec. 23, T29N, R10W. |
| 8. | Garcia GC B#1E (Blow pit) | Unit M, Sec. 21, T29N, R10W. |
| 9. | Hare GC C#1 (Blow pit) | Unit M, Sec. 25, T29N, R10W. |
| 10. | Hare GC C#1E (Blow pit) | Unit F, Sec. 25, T29N, R10W. |

- | | | |
|-----|----------------------------------|------------------------------|
| 11. | Hare GC F#1 (Separator pit) | Unit G, Sec. 23, T29N, R11W. |
| 12. | Lefkovitz GC B#1 (Blow pit) | Unit A, Sec. 25, T29N, R10W. |
| 13. | Lefkovitz GC B#1 (Separator pit) | Unit A, Sec. 25, T29N, R10W. |
| 14. | Masden GC #1 (Separator pit) | Unit A, Sec. 28, T29N, R11W. |
| 15. | Romero GC A#1 (Separator pit) | Unit K, Sec. 27, T29N, R10W. |
| 16. | Stedje GC #1 (Blow pit) | Unit F, Sec. 27, T30N, R12W. |
| 17. | Stedje GC #1E (Separator pit) | Unit A, Sec. 27, T30N, R12W. |
| 18. | Trujillo GC A#1 (Blow pit) | Unit C, Sec. 28, T29N, R10W. |

B. The sites listed below have chloride and/or total dissolved solids (TDS) contamination of ground water in excess of New Mexico Water Quality Control Commission (WQCC) standards. In addition, the downgradient and/or lateral extent of chloride and/or TDS contamination in ground water at these sites has not been completely defined. Therefore, approval of the closure actions at these sites is **denied**. The OCD requires that CTOC investigate the extent of and remediate these contaminants at each site pursuant to the previously approved ground water management plan.

- | | | |
|----|------------------------------------|------------------------------|
| 1. | Baca GC A #1A (Blow/separator pit) | Unit F, Sec. 26, T29N, R10W. |
| 2. | Haney GC B#1E (Separator pit) | Unit M, Sec. 20, T29N, R10W. |

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Nelson Velez, Blagg Engineering, 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

January 16, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-237

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

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has completed a review of 25 Amoco Production Company (Amoco) "PIT REMEDIATION AND CLOSURE REPORTS" with April 21, 1994 and April 25, 1994 dates.

The OCD's review of the above referenced document is addressed below:

A. The pit closure/soil remediation activities conducted at the sites listed below are **approved**.

1. Bruington GC B#1E (Blow pit) Unit O, Sec. 15, T29N, R12W.
2. Bruington GC B#1E (Separator pit) Unit O, Sec. 15, T29N, R12W.

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

B. The pit remedial activities conducted at the sites listed below are satisfactory. However, according to the reports, onsite landfarming and/or composting actions are still continuing at the sites. Subsequently, the OCD cannot issue final closure approval at this time and approval of closure actions at these sites is **denied**. Please resubmit final closure reports for these sites upon completion of the landfarming and/or composting activities. The final reports will include the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

1. Abrams GC E #1E (Blow/separator) Unit M, Sec. 30, T29N, R10W.
2. Abrams L #1A (Separator pit) Unit I, Sec. 26, T29N, R10W.

3.	Black GC #1E (Blow pit)	Unit G, Sec. 29, T29N, R10W.
4.	Eaton A #001 (Separator pit)	Unit P, Sec. 25, T29N, R11W.
5.	Garcia GC B#1 (Separator pit)	Unit J, Sec. 21, T29N, R10W.
6.	Garcia GC B#1 (Blow pit)	Unit J, Sec. 21, T29N, R10W.
7.	GCU #230E (Separator pit)	Unit O, Sec. 23, T28N, R12W.
8.	Hare GC C#1 (Blow pit)	Unit M, Sec. 25, T29N, R10W.
9.	Hare GC C#1 (Separator pit)	Unit M, Sec. 25, T29N, R10W.
10.	Harold B Chapson (Separator pit)	Unit J, Sec. 28, T29N, R10W.
11.	Lefkovitz GC B#1E (Separator pit)	Unit P, Sec. 25, T29N, R10W.
12.	Lefkovitz GC B#1E (Compressor pit)	Unit P, Sec. 25, T29N, R10W.
13.	Lefkovitz GC B#1E (Blow pit)	Unit P, Sec. 25, T29N, R10W.
14.	Maddox GC A#1 (Blow pit)	Unit M, Sec. 27, T29N, R10W.
15.	Maddox Gas Unit B#1 (Blow pit)	Unit O, Sec. 27, T29N, R10W.
16.	Pollock GC D#1 (Separator pit)	Unit M, Sec. 27, T29N, R10W.
17.	Sanchez GC B#1E (Separator pit)	Unit E, Sec. 28, T29N, R10W.
18.	VCU #26 (Blow pit)	Unit D, Sec. 22, T28N, R04W.

C. The final pit remedial contaminant levels at the sites listed below are in excess of the OCD's recommended remediation levels. Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**. The OCD requests that Amoco address the extent of the remaining contamination at these sites. The OCD will reconsider issuing closure approval upon resubmission of pit closure forms which address the remaining extent of contamination at the sites. The resubmitted forms should include the completed form and all pertinent information related to the extent of contamination, the results of the soil remediation levels achieved, the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

1. Morris GC C#1E (Separator pit) Unit I, Sec. 26, T29N, R10W.

D. Ground waters at the sites listed below are contaminated with petroleum related constituents in excess of New Mexico Water Quality Control Commission ground water standards. In addition, the extent of ground water contamination at the sites has not been determined. Therefore, approval of these pit closure forms is **denied**. The OCD requests that Amoco investigate the extent of contamination and, if necessary, remediate contaminated ground water pursuant to Amoco's November 21, 1995 ground water investigation/remediation work plan which was approved by the OCD on November 29, 1995.

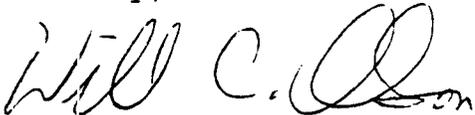
1. Baca GC A#1A (Separator pit) Unit F, Sec. 26, T29N, R11W.
2. Masden GC #1 (Separator pit) Unit A, Sec. 28, T29N, R11W.
3. State GC BS #1 (Separator pit) Unit K, Sec. 23, T29N, R11W.
4. State GC BS #1 (Separator pit) Unit K, Sec. 23, T29N, R11W.

Mr. B.D. Shaw
January 16, 1997
Page 3

To simplify the approval process for both Amoco and OCD, the OCD requests that Amoco submit all future pit closure reports only upon completion of all closure activities including onsite landfarming or composting of contaminated soils. The reports should include the completed form and all pertinent information related to the extent of contamination, the results of the soil remediation levels in the pits and landfarms, all laboratory analyses and associated quality assurance/quality control data and the disposition of all remediated soils.

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 Office
David Deardorff, New Mexico State Land Office
Nelson Velez, Blagg Engineering, Inc.
Ms. Charmaine Tso, Navajo Nation EPA