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APPROVALS

YEAR(S):

2000



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.

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|----|---------------------------------|------------------------------|
| 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.

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|----|------------------------------------|------------------------------|
| 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.

BLAGG ENGINEERING, INC.

P.O. Box 87, Bloomfield, New Mexico 87413

Phone: (505)632-1199 Fax: (505)632-3903

February 21, 2000

Mr. William C. Olson - Hydrologist
State of New Mexico Oil Conservation Division
2040 South Pacheco
State Land Office Building
Santa Fe, NM 87505

RECEIVED

FEB 25 2000

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

**RE: 1999 ANNUAL GROUNDWATER REPORTS
SAN JUAN COUNTY, NEW MEXICO
PERMANENT CLOSURE REQUESTED**

Dear Mr. Olson:

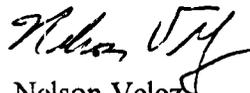
Blagg Engineering, Inc., on behalf of Cross Timbers Oil Company, respectfully submits the attached 1999 annual groundwater reports in which permanent closure is requested. This reporting adheres to the NMOCD's previously approved groundwater management plan.

A total of ten (10) well sites, listed on the following page, are associated with this correspondence. All work performed on these well sites have been incorporated into individual packets.

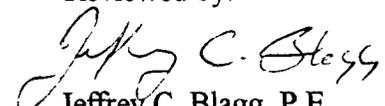
The summary, conclusions, and/or recommendations made within these reports are based on information made available from the enclosed material. Any site specific inquiries should be examined within the individual packets.

If you have questions, please call and contact either myself or Jeffrey C. Blagg. Thank you for your cooperation and assistance.

Sincerely,
BLAGG ENGINEERING, INC.


Nelson Velez
Staff Geologist

Reviewed by:


Jeffrey C. Blagg, P.E.
President

Attachments: Individual Well site packets

cc: Denny Foust, Deputy Oil & Gas Inspector, New Mexico Oil Conservation Division, Aztec, NM
Bill Liese, Regional Environmental Officer, Bureau of Land Management, Farmington, NM (2 copies)
Nina Hutton, Environmental & Safety Manager, Cross Timbers Oil Company, Ft. Worth, TX

NV/nv

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Groundwater Sites Requesting Permanent Closure

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|-----|-----------------------|-----------------------------|
| 1. | Baca GC A #1A | Unit G, Sec. 26, T29N, R10W |
| 2. | Haney GC B #1E | Unit M, Sec. 20, T29N, R10W |
| 3. | Hare GC C #1 | Unit M, Sec. 25, T29N, R10W |
| 4. | Masden GC # 1E | Unit D, Sec. 28, T29N, R11W |
| 5. | McDaniel GC B # 1E | Unit F, Sec. 26, T29N, R10W |
| 6. | Pearce GC # 1E | Unit J, Sec. 23, T29N, R11W |
| 7. | Sanchez GC # 1 | Unit G, Sec. 28, T29N, R10W |
| 8. | Snyder GC # 1A | Unit F, Sec. 19, T29N, R9W |
| 9. | Sullivan Frame A # 1E | Unit A, Sec. 30, T29N, R10W |
| 10. | Texas National GC # 1 | Unit K, Sec. 19, T29N, R9W |