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**GENERAL
CORRESPONDENCE**

YEAR(S):



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 21, 1999

CERTIFIED MAIL

RETURN RECEIPT NO: Z-274-520-641

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

RE: SAN JUAN BASIN GROUND WATER MONITORING REPORTS

Dear Ms. Hutton:

The New Mexico Oil Conservation Division (OCD) has reviewed Cross Timbers Oil Company's (CTOC) February 11, 1999 "CROSS TIMBERS OIL CO. GROUNDWATER MONITORING (AMOCO) 1996-1998 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 7 sites in the San Juan Basin.

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

1. The downgradient and/or lateral extent of chloride and/or total dissolved solids contamination at the sites listed below has not been completely defined. The OCD requires that CTOC completely define the extent of these contaminants at each site pursuant to the previously approved ground water management plan for these sites.
 - Bergin GC #1E Unit F, Sec. 21, T29N, R11W
 - Rowland GC #1 Unit P, Sec. 25, T30N, R12W
 - State GC BS #1 Unit F, Sec. 21, T29N, R11W
 - Sullivan GC D#1 Unit B, Sec. 26, T29N, R11W

2. The downgradient and/or lateral extent of benzene, toluene, ethylbenzene, xylene (BTEX), chloride and/or total dissolved solids contamination at the sites listed below has not been completely defined. The OCD requires that CTOC completely define the extent of these contaminants at each site pursuant to the previously approved ground water management plan for these sites.
 - Bruington GC #1 Unit E, Sec. 14, T29N, R11W
 - Valdez A #1E Unit G, Sec. 24, T29N, R11W

3. A review of the sampling data shows that during some samplings only ground water from the monitor wells at the source is sampled and there is no downgradient monitoring to show that contaminated ground water is contained. In order to effectively monitor contaminant migration, the OCD requires that the ground water monitoring plan be modified to include additional ground water sampling of all monitor wells at each site on an annual basis. During the annual sampling event ground water from all monitor wells will be sampled and analyzed for BTEX, TDS, polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) cations and anions and metals using EPA approved methods and quality assurance/quality control procedures. Specific analytes may be dropped from the annual sampling event for certain sites if that analyte has not been found to be above WQCC standard in the sites source areas and the reasons for dropping those analytes are included in the annual reports. This sampling requirement will also be added to the ground water monitoring plan for all future ground water sampling at all CTOC sites with contaminated ground water.

4. CTOC recently purchased a number of well sites in the San Juan Basin from Amoco. Some of these sites were found to have ground water contamination which was discovered by Amoco during pit closure activities. The OCD does not have a listing of status of these sites. Please provide the OCD with a listing of all CTOC well sites in the San Juan Basin at which the presence of ground water was discovered during pit assessment or closure activities and the status of each site.

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
Nelson Velez, Blagg Engineering, Inc.