3R - 135

GENERAL CORRESPONDENCE

YEAR(S):
1994

ON SITE
TECHNOLOGIES, LTD.

DIVISION

8 50

August 12, 1994

Mr. Bill Olson
Hydrogeologist
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

RE: DJ Simmons: LV Hamner A1A
Results of Groundwater Sampling: Dehy Pit Assessment
Unit F, Sec. 21, T29N, R9W, NMPM
San Juan County, New Mexico

Project No: 4-1095

This correspondence is a brief summary of the results of groundwater sampling at the above referenced DJ Simmons well location. The advancement of test holes and installation of drive points for the assessment of groundwater followed the proposed work plan outlined in On Site Technologies' letter dated July 12, 1994 to your office.

Field Exploration:

Between July 12 and July 14, 1994, five test holes were advance by hand and portable power auger to depths of six to twelve feet around the subject dehydration pit. Test holes TH #1, TH#2, and TH#3 were advanced approximately one foot into siltstone/claystone bedrock. Minimal interstitial water was encountered during drilling, and the holes were left open to determine if significant groundwater was present at their locations. Two additional test holes were advanced in an ephemeral wash located south and east of the pit. TH #4 was abandoned due to gravel and cobbles at four feet. Wet sands were encountered in TH#5 at approximately eight feet just prior to auger refusal in gravels and cobble. Although no free water was encountered, a drive point (DP#2) was installed in TH#5 using 2" diameter steel casing with a 4' screen. The screened interval was filter packed with 10-20 mesh silica sand. Refer to the attached Vicinity Map, Site Sketch and Test Hole Logs for the approximate sampling points and summary of encountered soil conditions..

As the groundwater appeared to be perched above the shale/sandstone bedrock, the bedding strike and bed of the bedrock was estimated from outcrops west of the well location and along Largo Wash. Strike was North 35° West and dipping Northeast 8°.

On July 18, 1994, the test holes and drive points were checked for free water. Substantial water was measured in test holes #1-#3 and drive point DP #1. No water was observed in DP #2. Water levels were measured, samples collected for lab analysis, and relative elevation surveys.

Table 1
ELEVATIONS & WATER LEVELS
L.V. HAMNER A1A: DEHY PIT
JULY 18, 1994

LOCATION	X	Y	ELEVATION	WATER LEVEL
WELL HEAD	0.00'	0.00'	100.00'	NA
TH #1	60.6'	-10.0'	99.22'	88.8'
TH#2	134.5'	47.3'	100.58'	91.3'
TH#3	168.9'	19.5'	99.91'	92.0'
DP#1	84.0'	-50.3'	93.76'	87.6'

NOTE: ELEVATIONS ARBITRARILY SET TO 100.00'.

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SAMPLING & ANALYTICAL RESULTS:

On July 18, 1994, water samples were collected from TH#1, TH#2, TH#3 and DP#1 where sufficient water was present. Due to the poor recharge, sample points were not purged prior to sampling. Groundwater samples from all points were collected in duplicate, placed in 40 ml glass VOA vials, put on ice and delivered immediately to the laboratory for BTEX analysis. An additional sample from TH#3 was placed in a plastic one liter bottle for major anion/cation API Water Analysis.

Table 2 summarizes the analytical results from the groundwater samples for aromatic hydrocarbons [i.e. benzene, toluene, ethyl-benzene, and total xylenes(BTEX)]. Copies of the lab reports and QA/QC are attached.

Table 2
LAB RESULTS FOR AROMATIC HYDROCARBONS
GROUNDWATER SAMPLES
L.V. HAMNER A1A: DEHY PIT
JULY 18, 1994

LOCATION	BENZENE (ppb)	TOLUENE (ppb)	ETHYL-BENZENE (ppb)	TOTAL XYLENES (ppb)
TH #1	1.9	14.7	ND	0.9
TH#2	2.0	4.5	ND	ND
TH#3	1.4	2.5	ND	ND
DP#1	2098	3477	236	1870

NOTE: ppb: Parts per billions equivalent to ug/L.

The API Water Analysis from TH #3 indicated a TDS of 8266 ppm, pH of 7.7, and resistivity of 0.05 ohms-meters (@ 80° F).

Conclusions:

The following conclusions were drawn from this assessment effort and previous soil sampling:

1) In the area of the dehy pit the hydraulic gradient (groundwater slope) is 0.04 ft/ft and trends toward the southwest.

2) The groundwater appears to be in a relatively thin soil layer perched above a shale/sandstone bedrock. DP #1 is in an apparent low area where groundwater may be ponding, as indicated by a deeper water level and stagnent odor during sampling.

3) The dehy pit is the most probable source of the detected groundwater contamination. However, flow along the ephemeral stream near DP#1 may also be contributing as the stream drains an area with numerous oil and gas wells upgradient.

4) Groundwater contamination is believed to be limited to the immediate vicinity of DP#1.

As indicated in our original letter, discharge has been ceased and equipment moved from the dehy pit. Efforts have been made by D.J. Simmons(well operator) to determine if El Paso Natural Gas (EPNG) has schedule the subject pit for remediation. As of this writing, we have receive no comments from EPNG. Once pit remediation by EPNG is initiated, D.J. Simmons will cooperate with EPNG to address the groundwater contamination.

This completes our assessment for the dehy pit at the L.V. Hamner A1A well location. Once remediation of the contaminated soils and groundwater has been completed additional sampling of may be necessary to verify closure.

Please contact Myke Lane or Cindy Gray at (505) 325-5667 if you have any questions or need additional information. Thank you for your assistance with this matter.

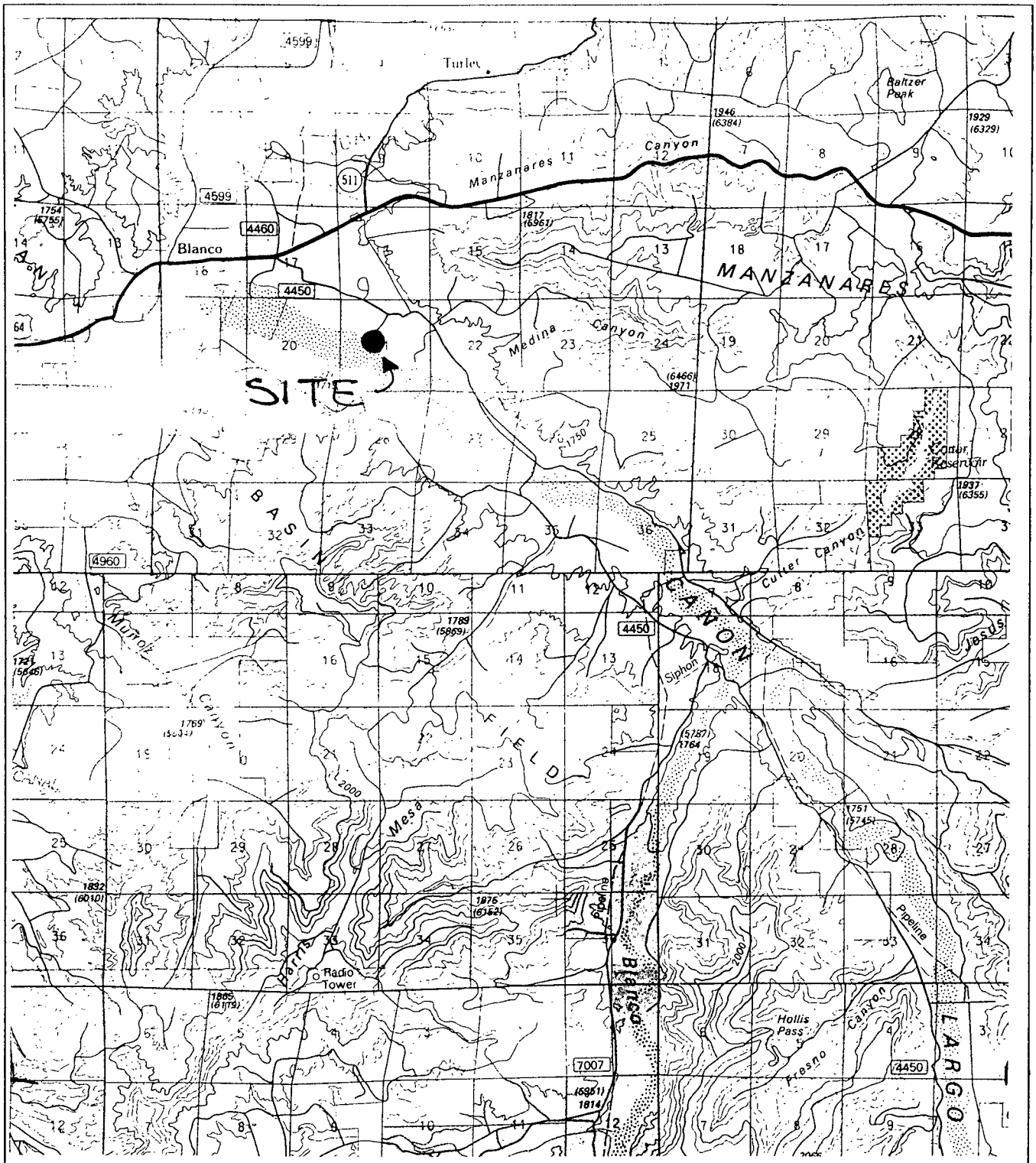
Respectfully submitted,
ON SITE TECHNOLOGIES, Ltd.

Michael K. Lane, P.E.
Geological Engineer

ATTACHMENTS: VICINITY MAP
SITE SKETCH
TEST HOLE LOGS (2/2)
LAB ANALYSES: BTEX (4/4) & API (1/1)
LAB QA/QC

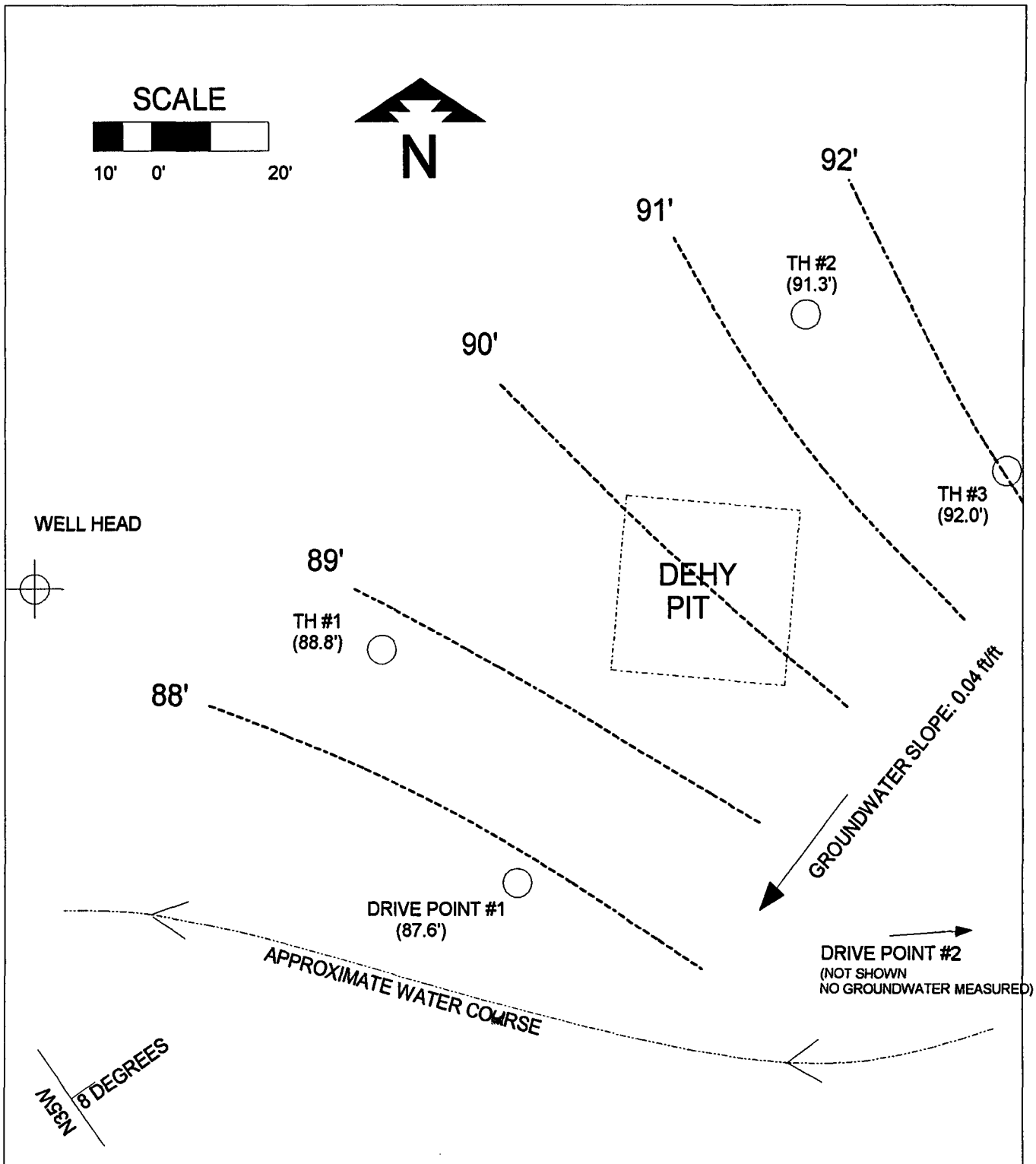
CC: Denny Foust, NMOCD Aztec
DJ Simmons
OSTL File

MKL/mkl
FILE: 41095RLT.LTR



REFERENCE: BLM EDITION SURFACE MANAGEMENT STATUS USGS 30x 60 MINUTE MAP, 1980.

D. J. SIMMONS L.V. HAMNER A1A: DEHY PIT ASSESSMENT Unit F, Sec. 21, T29N, R9W, NMPM SAN JUAN COUNTY, NEW MEXICO		VICINITY MAP	ON SITE TECHNOLOGIES, LTD. P.O. BOX 2606, FARMINGTON, NM 87499 (505) 325-5667
PROJECT: GROUND WATER ASSESSMENT		DRWN: JULY 28, 1994	
PROJECT NO: 4-1095		DRWN BY: MKL	
SHEET: A	FILE: 41095SA.CAD	REVISED: AUG. 9, 1994	



D. J. SIMMONS L.V. HAMNER A1A: DEHY PIT ASSESSMENT Unit F, Sec. 21, T29N, R9W, NMPM SAN JUAN COUNTY, NEW MEXICO		SITE SKETCH
PROJECT: GROUND WATER ASSESSMENT		DRWN: JULY 28, 1994
PROJECT NO: 4-1095		DRWN BY: MKL
SHEET: 1	FILE: 41095S1.CAD	REVISED: AUG. 9, 1994

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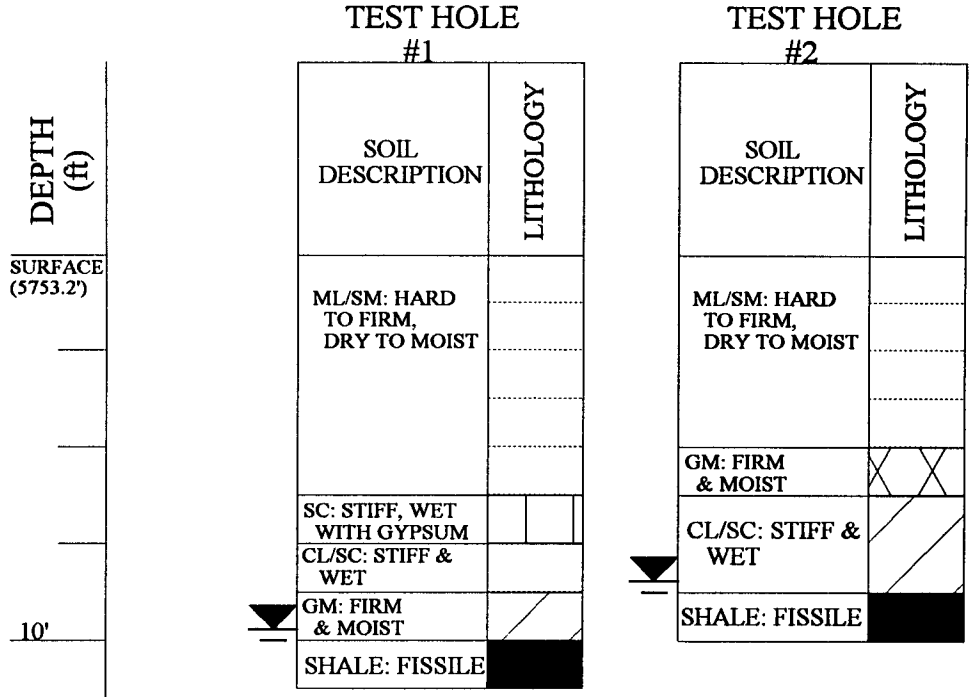
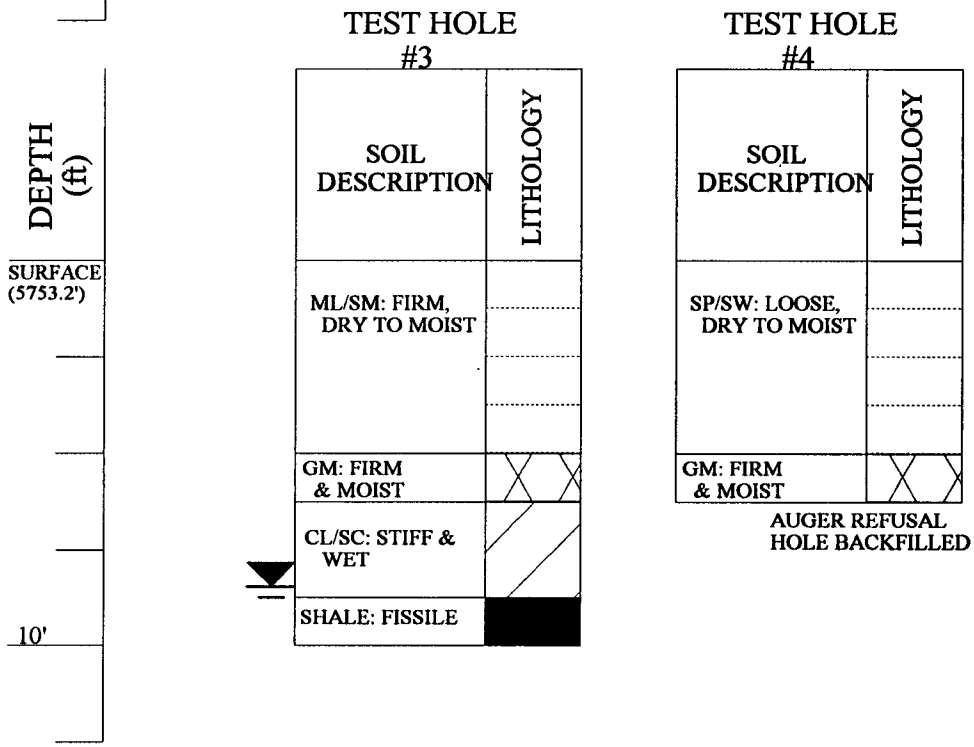
(505) 325-5667





D. J. SIMMONS L.V. HAMNER A1A: DEHY PIT ASSESSMENT Unit F, Sec. 21, T29N, R9W, NMPM SAN JUAN COUNTY, NEW MEXICO		TEST HOLE LOGS
PROJECT: GROUND WATER ASSESSMENT		DRWN: JULY 28, 1994
PROJECT NO: 4-1095		DRWN BY: MKL
SHEET: 2	FILE: 41095S2.CAD	REVISED:

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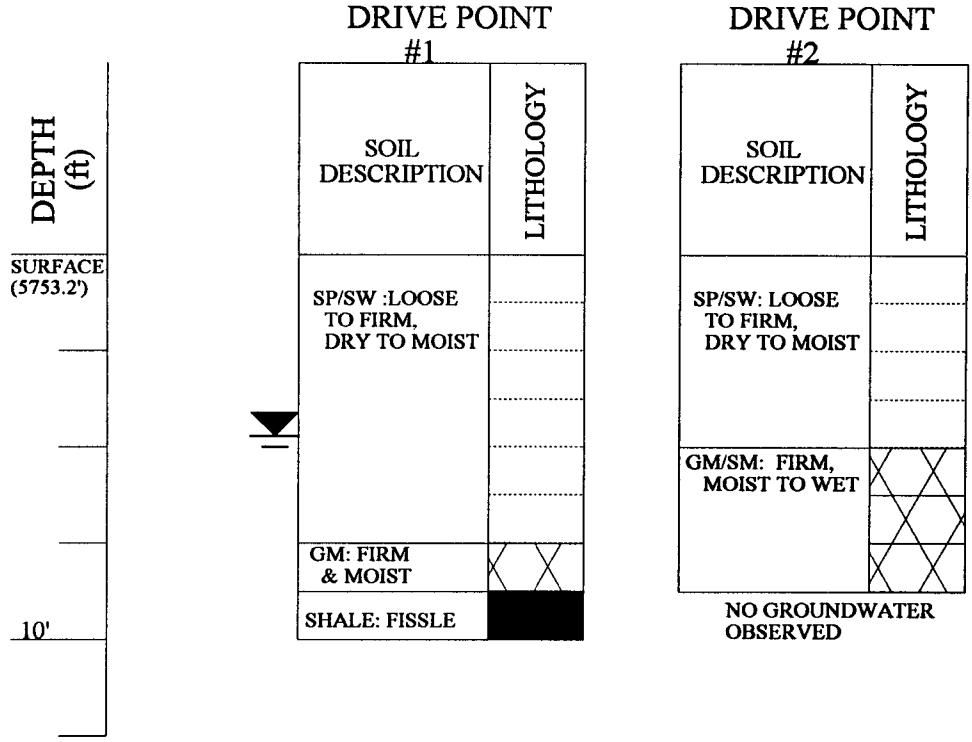
(505) 325-5667



D. J. SIMMONS L.V. HAMNER A1A: DEHY PIT ASSESSMENT Unit F, Sec. 21, T29N, R9W, NMPM SAN JUAN COUNTY, NEW MEXICO		TEST HOLE LOGS
PROJECT: GROUND WATER ASSESSMENT		DRWN: JULY 28, 1994
PROJECT NO: 4-1095		DRWN BY: MKL
SHEET: 3	FILE: 41095S3.CAD	REVISED:

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(505) 325-5667

ON SITE TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn:	*Michael K. Lane*	Date:	7/19/94
Company:	*On Site Technologies, Inc.*	*Lab ID:*	*1665*
Address:	*657 W. Maple*	*Sample ID:*	*2017*
City, State:	*Farmington, NM 87401*	*Job No.*	*2-1000*

Project Name:	***D. J. Simmons***				
Project Location:	***DP #1 L V Hammer AIA***				
Sampled by:	MKL	Date:	7/18/94	Time:	12:00
Analyzed by:	DLA	Date:	7/19/94		
Sample Matrix:	*Liquid*				

Aromatic Volatile Organics

Component	****Measured Concentration ug/L***
Benzene	*2,098*
Toluene	*3,477*
Ethylbenzene	*236*
m,p-Xylene	*1,393*
o-Xylene	*477*
TOTAL	*7,681 ug/L*

ND - Not Detectable
*** - Method Detection Limit, 2 ug/L*

Method *- SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved by: D. G.
Date: 7/22/94

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ON SITE TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn:	*Michael K. Lane*	Date:	7/19/94
Company:	*On Site Technologies, Inc.*	*Lab ID:*	*1665*
Address:	*657 W. Maple*	*Sample ID:*	*2018*
City, State:	*Farmington, NM 87401*	*Job No.*	*2-1000*

Project Name:	***D. J. Simmons***				
Project Location:	***TH #1 L V Hammer AIA***				
Sampled by:	MKL	Date:	7/18/94	Time:	11:25
Analyzed by:	DLA	Date:	7/19/94		
Sample Matrix:	*Liquid*				

Aromatic Volatile Organics

Component	***Measured Concentration ug/L
Benzene	*1.9*
Toluene	*14.7*
Ethylbenzene	*ND*
m,p-Xylene	*ND*
o-Xylene	*0.9*
TOTAL	*17.4 ug/L*

ND - Not Detectable
*** - Method Detection Limit, 2 ug/L*

Method *- SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved by: D. G.
Date: 7/22/94

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AROMATIC VOLATILE ORGANICS

Attn:	*Michael K. Lane*	Date:	7/19/94
Company:	*On Site Technologies, Inc.*	*Lab ID:*	*1665*
Address:	*657 W. Maple*	*Sample ID:*	*2019*
City, State:	*Farmington, NM 87401*	*Job No.*	*2-1000*

Project Name:	***D. J. Simmons***				
Project Location:	***TH #2 L V Hammer AIA***				
Sampled by:	MKL	Date:	7/18/94	Time:	11:20
Analyzed by:	DLA	Date:	7/19/94		
Sample Matrix:	*Liquid*				

Aromatic Volatile Organics

Component	****Measured Concentration ug/L***
Benzene	*2.0*
Toluene	*4.5*
Ethylbenzene	*ND*
m,p-Xylene	*ND*
o-Xylene	*ND*
TOTAL	*6.5 ug/L*

ND - Not Detectable
*** - Method Detection Limit, 2 ug/L*

Method *- SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved by: D. Gx
Date: 7/22/94

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AROMATIC VOLATILE ORGANICS

Attn:	*Michael K. Lane*	Date:	7/19/94
Company:	*On Site Technologies, Inc.*	*Lab ID:*	*1665*
Address:	*657 W. Maple*	*Sample ID:*	*2020*
City, State:	*Farmington, NM 87401*	*Job No.*	*2-1000*

Project Name:	***D. J. Simmons***				
Project Location:	***TH #3 L V Hammer AIA***				
Sampled by:	MKL	Date:	7/18/94	Time:	11:15
Analyzed by:	DLA	Date:	7/19/94		
Sample Matrix:	*Liquid*				

Aromatic Volatile Organics

Component	****Measured Concentration ug/L***
Benzene	*1.4*
Toluene	*2.5*
Ethylbenzene	*ND*
m,p-Xylene	*ND*
o-Xylene	*ND*
TOTAL	*3.9 ug/L*

ND - Not Detectable
*** - Method Detection Limit, 2 ug/L*

Method *- SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved by: [signature]
Date: 7/22/94

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ON SITE TECHNOLOGIES, LTD.

API Water Analysis

Attn:	Michael K. Lane	Date:	7/22/94
Company:	On Site Technologies	Lab ID:	1665
Address:	657 W Maple St.	Sample ID:	2020
City, State:	Farmington, NM 87401	Job No.:	2-1000

Project Name:	D. J. Simmons				
Project Location:	TH #3 L V Hamner A1A				
Sampled by:	MKL	Date:	7/18/94	Time:	11:15
Analyzed by:	DLA	Date:	7/22/94		

API RP-45 Laboratory Analysis

DISSOLVED SOLIDS			
CATIONS			
Sodium	Na	3135	mg/L
Calcium	Ca	371.0	mg/L
Magnesium	Mg	34.0	mg/L
Potassium	K	60.5	mg/L
ANIONS			
Chloride	Cl	89.4	mg/L
Sulfate	SO4	4280	mg/L
Carbonate	CO3	0	mg/L
Bicarbonate	HCO3	296	mg/L
Hyroxide	OH	0	mg/L
Total Dissolved Solids		8266	mg/L
Iron	Fe (total)	0.5	mg/L
Sulfide	H2S	NT	mg/L

OTHER PROPERTIES	
pH	7.70
Specific Gravity 60/60 F	1.0169
Resistivity (ohm-meters) 60 F	0.05
Total Hardness as CaCO3 ppm	1066

Comments:

*ND: Not Detectable - Positive/Negative
**NT: Not Analyzed

Approved by:
Date: 7/22/94

FAX: (505) 327-1496 • 24 HR. – (505) 327-7105 • OFF.: (505) 325-8786
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ON SITE TECHNOLOGIES, LTD.

QUALITY ASSURANCE REPORT

for EPA Method 8020

Date Analyzed: 7/19/94

Internal QC No.: 0222-STD
Surrogate QC No.: 0223-STD
Reference Standard QC No.: 0300-STD

Method Blank

Analytes in Blank	*Amount*
Average Amount of All Analytes In Blank	<1 ppb

Calibration Check

Calibration Standards	*Units of Measure*	**True Value*	*Analyzed Value*	*% Diff*	*Limit*
Benzene	ppb	20	19	5	15%
Toluene	ppb	20	18	11	15%
Ethylbenzene	ppb	20	18	11	15%
m,p-Xylene	ppb	40	35	13	15%
o-Xylene	ppb	20	18	11	15%

Spike Results

Analyte	*1- Percent Recovered*	*2 - Percent Recovered*	*Limit*	*%RSD*	*Limit*
Benzene	99	104	(39-150)	3	20%
Toluene	100	99	(46-148)	1	20%
Ethylbenzene	100	105	(32-160)	3	20%
m,p-Xylene	102	103	(35-145)	1	20%
o-Xylene	101	98	(35-145)	2	20%

Surrogate Recoveries

Laboratory Identification	*S1* Percent Recovered	*S2* Percent Recovered	*S3* Percent Recovered
Limits	(70-130)		
2019-1665	103		

S1: Flourobenzene

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ID 1555

CHAIN OF CUSTODY RECORD

ON SITE TECHNOLOGIES LIMITED

Date: 7-18-94

Page 1 of 1

657 W. Maple ▪ P. O. Box 2606 ▪ Farmington, NM 87499
LAB: (505) 325-5667 ▪ FAX: (505) 325-6256

Purchase Order No.:	Reference No.:		
SEND INVOICE TO — Name		REPORT RESULTS TO — Name	Title
Company	Dept.	Company	
Address		Mailing Address	
City, State, Zip		City, State, Zip	
		Telephone No.	Telefax No.

Special Instructions:

Sampler:

SAMPLE IDENTIFICATION	DATE/TIME SAMPLED	COMPOSITE/ GRAB	PRESERVATIVES	Number of Containers	ANALYSIS REQUESTED										Remarks (matrix)
L-1 #1				2	✓										
TH #1				2	✓										
TH #2				2	✓										
TH #3				2	✓	✓									

Relinquished by:	Date/Time	Received by:	Date/Time
Relinquished by:	Date/Time	Received by:	Date/Time
Relinquished by:	Date/Time	Received by:	Date/Time

Method of Shipment:

Authorized by: _____ Date _____
(Client Signature Must Accompany Request)

Rush	5 Working Days	10 Working Days	Sampling Location:

Distribution: White – On Site Yellow – LAB Pink – Sampler Goldenrod – Client

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal | Time 1600 hrs | Date 8/8/94

Originating Party	Other Parties
Bill Olson - Envir. Bureau	Mike Lane - Onsite Technology 325-5667

Subject

D.J. Simmons - LV Hamner AIA

Discussion

Questions about G.W. investigation
- PAH's analyzed for (No)
- Prior approval of 7/12/94 work plan (Denny verbally said it was OK)
- report submission (see below)

Onsite Completed work on site but extent not completed

Told him GW contamination required to be reported to Envir. Bureau Chief
Same also applies to work plans and approvals regarding GW

Conclusions or Agreements

Report on recent work will be submitted by 1-2 weeks
Will report GW & submit work plans, reports to Envir. Bureau Chief
with copies to District office

stribution

Signed Bill Olson

ON SITE
TECHNOLOGIES, LTD

OIL CONSERVATION DIVISION
RECEIVED
94 JUL 19 AM 8 50

July 12, 1994

Mr. Denny Foust
Deputy Oil & Gas Inspector
New Mexico Oil Conservation Division
Aztec, New Mexico 87410

RE: DJ Simmons: LV Hamner A1A
Dehydrator Pit Assessment
Unit F, Sec. 21, T29N, R9W, NMPM
San Juan County, New Mexico

This correspondence is to verify our conversation on July 11, 1994 regarding the above referenced DJ Simmons well location. During the assessment of the dehydrator pit on this location highly contaminated soils were identified (refer to the attached field notes). Due to relatively shallow groundwater, a temporary drive point was placed approximately 35 feet southwest of the pit to assess the groundwater quality. Lab tests of the groundwater for aromatic hydrocarbons (i.e. BTEX) indicate contamination (refer to the attached lab report).

Discharge to the dehydrator pit has ceased for some time and the equipment has been removed. Ownership of the pit and resulting contamination has not been resolved between the operator and El Paso Natural Gas (EPNG) at the present time.

Due to the well location's proximity to Largo Canyon and other ephemeral drainages, the site specific groundwater direction is not yet well understood. In addition, several other wells are in the same general area and the source of the groundwater contamination has not been definitively determined.

EPNG has been contacted to determine if the subject dehydrator pit is scheduled for remediation, but at the present time we have received no answer.

On behalf of DJ Simmons, On Site Technologies is scheduled to install two additional temporary drive points. Drive points will be constructed of 2" diameter steel casing with a 4' to 6' screen. An effort will be made to place the screen interval midway over the groundwater table. All three drive points will be purged by removing a minimum of three well volumes. Water levels will be measured relative to the top of casing, and relative elevations established by engineering survey. The following sampling and testing protocol will be implemented:

	MEASUREMENTS & TESTING
ALL POINTS	WATER LEVEL, pH, Conductivity, Temperature, BTEX (EPA Method 8020)
POINT #1	API WATER ANALYSIS (MAJOR CAT/ANIONS & TDS)

Following the sampling all drive points will be removed and borings plugged with bentonite rich grout.

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Results of the groundwater assessment will be forwarded to your office following completion of the sampling and lab testing. Please contact Myke Lane or Cindy Gray at (505) 325-5667 if you have any questions or need additional information. Thank you for your assistance with this matter.

Respectfully submitted,
ON SITE TECHNOLOGIES, Ltd.

Michael K. Lane, P.E.
Geological Engineer

ATTACHMENTS: Field Notes: LV HAMNER A1A (5/19/94)
Lab Report: Aromatic Volatile Organics (6/9/94)

CC: Bill Olson, NMOCD Santa Fe
DJ Simmons
OSTL File

MKL/mkl
FILE: 41095NTC.LTR

ON SITE TECHNOLOGIES, LTD.

AROMATIC VOLATILE ORGANICS

Attn:	*Cindy Gray*	Date:	6/9/94
Company:	*On Site Technologies, Ltd.*	*Lab ID:*	*1652*
Address:	*657 W. Maple*	*Sample ID:*	*1584*
City, State:	*Farmington, NM 87401*	*Job No.*	*2-1000*

Project Name:	***D. J. Simmons***			
Project Location:	***Water Sample D. J. Simmons Well***			
Sampled by:	JL	Date:	6/8/94	Time:
Analyzed by:	DLA	Date:	6/9/94	
Sample Matrix:	*Liquid*			

Aromatic Volatile Organics

Component	***Measured Concentration ug/L
Benzene	*2,400*
Toluene	*3,832*
Ethylbenzene	*233*
m,p-Xylene	*1,362*
o-Xylene	*455*
TOTAL	*8,282 ug/L*

ND - Not Detectable
*** - Method Detection Limit, 2 ug/L*

Method *- SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography*

Approved by:
Date: 6/9/94

FAX (505) 327-1496 • PHONE (505) 327-1105 • OFF (505) 325-8786
[illegible] • SUITE [illegible] • [illegible] • FARMINGTON, NEW MEXICO 87499

ON SITE TECHNOLOGIES, LTD.

TEST HOLE LOG and FIELD TESTING RESULTS

PROJECT: D J Simmons JOB #: 4-1095 DATE: 5/19/94

SITE LOCATION: C.V. Hammond AID CLIENT: D.J. Simmons

SAMPLER: Jon Little

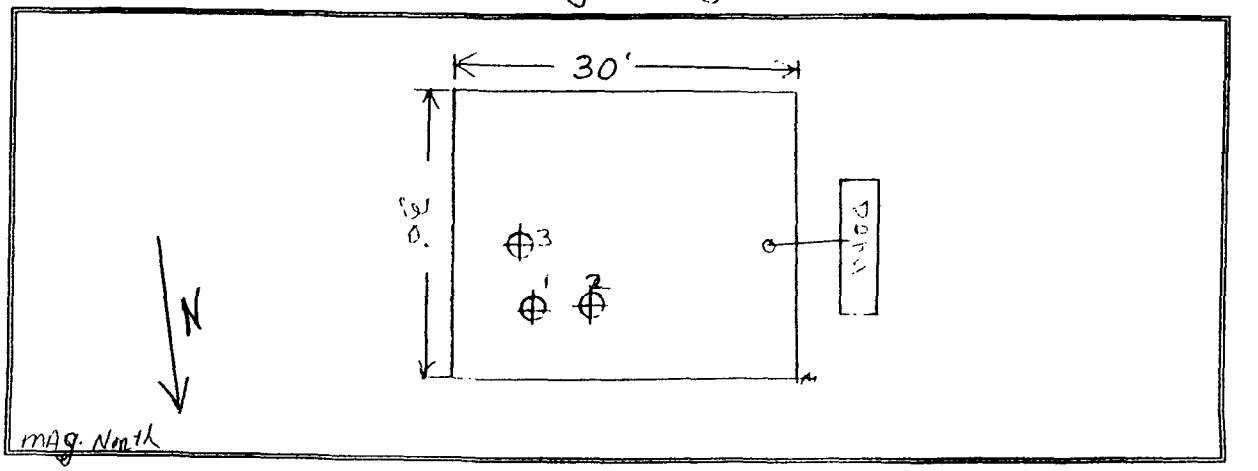
METHOD:

TEST HOLE #: 1, 2, 3 LAB SAMPLE IDs

Composite TPH = 7291 ppm

	DEPTH	SOIL TYPE	P.I.D. FIELD SCREENING	TPH EPA 418.1	OTHER REMARKS
1	3	clay silty to silty clay	↑	N/A	free product setting on pit 11' FEL 8' FNL
2	3	"	2500 ppm	N/A	13 FEL 8' FNL
3	3	"	↓	N/A	9' FEL 9' FNL
1	6'	"	2500	N/A	FEL 8' FNL
	9'	blk sand	2500		@ 9 foot sample is very wet.
	12'				sample to wet will not stay in sample tube

SITE SKETCH WEATHER Sunny & windy APPROX.TEMP. 80°F



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