

3R - 146

# APPROVALS

YEAR(S):

1998-1997



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

March 13, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-245**

Ms. Sandra D. Miller  
El Paso Field Services  
P.O. Box 4990  
Farmington, New Mexico 87499

**RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS FOR GROUNDWATER SITES**

Dear Ms. Miller:

The New Mexico Oil Conservation Division (OCD) has completed a review of El Paso Field Services (EPFS) November 5, 1997 "REQUEST FOR CLOSURE OF ELEVEN GROUNDWATER LOCATIONS" and the accompanying July 1997 "SAN JUAN BASIN PIT CLOSURES, SAN JUAN BASIN, NEW MEXICO, PIT CLOSURE REPORT". These documents contain the results of the closure of 11 unlined oil and gas production pits in the San Juan Basin at which ground water was encountered.

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

A. The pit closure, soil remediation and ground water activities conducted at the sites listed below are **approved**.

- |     |                                       |                             |
|-----|---------------------------------------|-----------------------------|
| 1.  | McGrath #1 (Drip pit)                 | Unit F, Sec. 07, T30N, R11W |
| 2.  | NM Com G#1 (Drip pit)                 | Unit P, Sec. 36, T30N, R10W |
| 3.  | Johnston Federal #3A (Dehy pit)       | Unit I, Sec. 12, T30N, R09W |
| 4.  | Gallegos Canyon Unit #188E (Dehy pit) | Unit B, Sec. 30, T29N, R12W |
| 5.  | Gallegos Canyon Unit #145E (Dehy pit) | Unit D, Sec. 26, T29N, R12W |
| 6.  | Jacquez #3 (Drip pit)                 | Unit E, Sec. 25, T30N, R09W |
| 7.  | Anderson Gas Com A#1 PC (Drip pit)    | Unit C, Sec. 28, T29N, R10W |
| 8.  | 2C-22 #1 Line Drip (Line drip pit)    | Unit N, Sec. 35, T24N, R06W |
| 9.  | Mae Gail Com #1 (Dehy pit)            | Unit E, Sec. 24, T29N, R11W |
| 10. | Salazar G 34-1 (Drip pit)             | Unit K, Sec. 34, T25N, R06W |

Please be advised that OCD approval does not relieve EPFS 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 EPFS of responsibility for compliance with any other federal, state or local laws and/or regulations.

Ms. Sandra D. Miller

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- B. The closure report for the site listed below shows that there were no ground water samples taken from the source area of contamination at the pit. Monitor wells were only installed a distance from the pit area. Therefore, the OCD cannot issue final closure approval at this time and approval of closure actions at this site is **denied**. The OCD requires that EPFS determine the contaminant concentrations in ground water at the pit source area pursuant to their previously approved ground water investigation plan. The OCD will reconsider issuing final closure approval when the report is resubmitted with the results of these ground water analyses.

1. Mary Ackroyd #1 (Drip pit)

Unit J, Sec. 18, T30N, R11W.

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  
Bill Liess, BLM Farmington District Office  
Mike Matush, New Mexico State Land Office



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August 6, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-410-431-203**

Mr. Ricky D. Cosby  
El Paso Field Services  
P.O. Box 4990  
Farmington, New Mexico 87499

**RE: SAN JUAN BASIN GROUND WATER REPORTS**

Dear Mr. Cosby:

The New Mexico Oil Conservation Division (OCD) has reviewed El Paso Field Service's (EPFS) June 2, 1997 "SEMI-ANNUAL EL PASO FIELD SERVICES PIT PROJECT GROUND WATER REPORT". This document contains EPFS's a listing of San Juan Basin pit closure sites at which EPFS has encountered ground water and a proposal to modify the reporting schedule for ground water cases from semi-annual to annual.

The above referenced proposal is approved with the following conditions:

1. EPFS will submit the annual reports on investigation/remedial activities to the OCD by December 1 of each respective year. The reports will present the information on each site as a separate case. Each case will contain:
  - a. A description of all investigation remediation activities which occurred during the past year including conclusions and recommendations.
  - b. Summary tables of all past and present laboratory analytic results of ground water quality monitoring including copies of the past years laboratory data sheets and associated quality assurance/quality control data.

Mr. Ricky Cosby  
August 6, 1997  
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- c. A site map and a quarterly water table elevation map using the water table elevation of the ground water in all monitor wells.
- d. A geologic log and completion diagram for each monitor well.
- e. The disposition of all wastes generated.
- f. Isoconcentration maps for contaminants of concern at the site (ie. benzene, BTEX, chloride, TDS, etc.).

Please be advised that OCD approval does not relieve EPFS of liability if contamination exists which is beyond the scope of the work plan; if the activities fail to adequately determine the extent of contamination; or if the activities fail to adequately remediate or monitor contamination related to EPFS's activities. In addition, OCD approval does not relieve EPFS of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Bill Liess, BLM Farmington District