

3R - 220

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



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

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 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



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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

January 24, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-241

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

RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS

Dear Ms. Miler:

The New Mexico Oil Conservation Division (OCD) has completed a review of El Paso Field Services (EPFS) August 20, 1996 "PRODUCTION PIT CLOSURE SUBMITTAL" and July 1996 "SAN JUAN BASIN PIT CLOSURES, SAN JUAN BASIN, NEW MEXICO, PIT CLOSURE REPORT". These documents contain the results of pit closure activities at 39 sites which encountered shallow ground water.

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

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

- | | |
|--------------------------------------|------------------------------|
| 1. Apache Federal #4 (Drip pit) | Unit M, Sec. 07, T24N, R05W. |
| 2. Argo #1E (Dehy pit) | Unit N, Sec. 18, T27N, R10W. |
| 3. Burroughs Com #1 (Drip pit) | Unit H, Sec. 36, T27N, R08W. |
| 4. Candelaria Gas Com C#1 (Drip pit) | Unit C, Sec. 27, T29N, R10W. |
| 5. Canyon Largo Unit #298 (Drip pit) | Unit A, Sec. 03, T24N, R06W. |
| 6. Canyon Largo Unit #302 (Drip pit) | Unit J, Sec. 03, T24N, R06W. |
| 7. Canyon Largo Unit #336 (Drip pit) | Unit C, Sec. 24, T25N, R06W. |
| 8. Charley Pah #4 (Drip pit) | Unit K, Sec. 12, T27N, R09W. |
| 9. Cleveland No.6 (Drip pit) | Unit B, Sec. 21, T27N, R09W. |
| 10. Cutler #2 (Drip pit) | Unit A, Sec. 14, T24N, R06W. |
| 11. Federal 6 #32 CH (Drip pit) | Unit G, Sec. 06, T26N, R07W. |
| 12. Federal R#2 (Drip pit) | Unit P, Sec. 15, T27N, R08W. |
| 13. Flora Vista #1 (Dehy pit) | Unit F, Sec. 22, T30N, R12W. |
| 14. Gartner LS #7 (Dehy pit) | Unit K, Sec. 26, T30N, R08W. |
| 15. Grace Pearce #1 (Drip pit) | Unit O, Sec. 22, T29N, R11W. |
| 16. Green Com #1 (Drip pit) | Unit E, Sec. 36, T29N, R09W. |
| 17. Hammond Fed #1 (Drip pit) | Unit L, Sec. 25, T27N, R08W. |
| 18. Hammond Fed #5 (Drip pit) | Unit D, Sec. 25, T27N, R08W. |
| 19. Hammond #7 (Drip pit) | Unit G, Sec. 26, T27N, R08W. |
| 20. Hammond #92 (Drip pit) | Unit O, Sec. 25, T27N, R08W. |
| 21. Howell #3 (Drip pit) | Unit C, Sec. 03, T27N, R08W. |
| 22. Krause WN Federal #1E (Drip pit) | Unit C, Sec. 32, T28N, R11W. |
| 23. Lat 2C-55 Line Drip (Drip pit) | Unit F, Sec. 17, T25N, R07W. |
| 24. Lindrith Unit #23 (Drip pit) | Unit O, Sec. 09, T24N, R03W. |

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25. Marshall "B" #1J (Drip pit)	Unit O, Sec. 14, T27N, R09W.
26. Ona McGee #1 (Dehy pit)	Unit P, Sec. 04, T30N, R11W.
27. Price #3 (Dehy pit)	Unit A, Sec. 15, T28N, R08W.
28. Sanchez Gas Com C#1 (Drip pit)	Unit A, Sec. 28, T29N, R10W.
29. Valdez #2 (Drip pit)	Unit G, Sec. 24, T29N, R11W.

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.

B. 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. At these sites, subsequent closure monitoring was not performed or the extent of ground water contamination at the sites was not been determined. Therefore, approval of these pit closure forms is **denied**. The OCD requests that, as necessary, EPFS investigate the extent of contamination, perform subsequent closure monitoring and/or remediate contaminated ground water pursuant to EPFS's November 29, 1995 ground water investigation/remediation work plan which was approved by the OCD on November 30, 1995.

1. 2C-22 #3 Line Drip (Drip pit)	Unit G, Sec. 13, T24N, R06W.
2. 2C-45 Line Drip (Drip pit)	Unit P, Sec. 13, T25N, R06W.
3. Canyon Largo Unit #304 (Drip pit)	Unit C, Sec. 11, T24N, R06W.
4. Gallegoc Canyon Unit #188E (Dehy)	Unit B, Sec. 30, T29N, R12W.
5. Graham #53 (Dehy pit)	Unit L, Sec. 10, T27N, R08W.
6. K-17 Line Drip (Drip pit)	Unit C, Sec. 26, T27N, R08W.
7. McGrath #1 (Drip pit)	Unit F, Sec. 07, T30N, R11W.
8. Miles Federal #1E (Dehy pit)	Unit N, Sec. 05, T26N, R07W.
9. Trunk D Line Drip (Loop D-8) (Drip)	Unit F, Sec. 20, T28N, R08W.
10. Trujillo Gas Com A#1 (Drip pit)	Unit C, Sec. 28, T29N, R10W.

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
Charmaine Tso, Navajo Nation EPA
Kurt Sandoval, Jicarilla Apache EPO