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## APPROVALS

YEAR(S):

2000-1995



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

September 7, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051-3594**

Mr. Tommy H. Arnwine  
Louis Dreyfus Natural Gas  
P.O. Box 525  
Sonora, Texas 76950

**RE: FINAL SAN JUAN BASIN PIT CLOSURE REPORTS**

Dear Mr. Arnwine:

The New Mexico Oil Conservation Division (OCD) has reviewed Louis Dreyfus Natural Gas' (LDNG) July 26, 2000 "MILES FEDERAL #1E, SECTION 05, T26N, R07W, RIO ARRIBA COUNTY, NEW MEXICO", July 24, 2000 "MKL #2-R, SECTION 5, T26N, R07W, RIO ARRIBA COUNTY, NEW MEXICO", and January 17, 2000 "FEDERAL 6-32, SECTION 6, T26N, R07W, SW/NE, RIO ARRIBA COUNTY, NEW MEXICO". These documents contain the results of the closure of unlined oil and gas production pits at the three well sites in Rio Arriba County, New Mexico.

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

- |    |                                   |                             |
|----|-----------------------------------|-----------------------------|
| 1. | Federal 6-32 (separator pit)      | Unit O, Sec. 06, T26N, R07W |
| 2. | Miles Federal #1E (separator pit) | Unit N, Sec. 05, T26N, R07W |
| 3. | MKL #2R (separator pit)           | Unit N, Sec. 05, T26N, R07W |

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Will Olson". The signature is written in a cursive style with a large initial "W".

William C. Olson  
Hydrologist  
Environmental Bureau

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

**OIL CONSERVATION DIVISION**

2040 S. Pacheco  
Santa Fe, New Mexico 87505

November 14, 1995

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-512**

Mr. Gene Simer  
Louis Dreyfus Natural Gas Corporation  
P.O. Box 2993  
Farmington, New Mexico 87499

**RE: PIT CLOSURE  
FEDERAL #6-32 WELL SITE**

Dear Mr. Simer:

The New Mexico Oil Conservation Division (OCD) has completed a review of Louis Dreyfus Natural Gas Corporation's (LDNGC) October 19, 1995 "LOUIS DREYFUS NATURAL GAS CORPORATION, FEDERAL #6-32, SEC 6, T26N, R07W, SW/NE, RIO ARRIBA COUNTY, NEW MEXICO" which was submitted on behalf of LDNGC by their consultant Contract Environmental Services, Inc. This document contains LDNGC's work plan for additional investigations of the extent of soil and ground water contamination related to LDNGC's unlined pit disposal activities at the Federal #6-32 well site.

The above referenced work plan is approved with the following conditions:

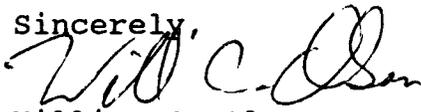
1. The initial monitor well will be located downgradient and immediately adjacent to the former pit location.
2. All monitor wells will be constructed as set out below:
  - a. A minimum of fifteen feet of well screen will be installed, with at least five feet of well screen above the water table and ten feet of well screen below the water table.
  - b. An appropriately sized gravel pack will be set around the well screen from the bottom of the hole to a minimum of 2 feet above the top of the well screen.
  - c. A 2-3 foot bentonite plug will be placed above the gravel pack.
  - d. The remainder of the hole will be grouted to the surface with cement containing 5 % bentonite.

Mr. Gene Simer  
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3. Each monitor well will be developed upon completion using EPA approved procedures.
4. All wastes generated will be disposed of at an OCD approved facility.
5. Ground water from the monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), major cations and anions, heavy metals and polynuclear aromatic hydrocarbons using EPA approved methods.
6. LDNGC will submit a report on the investigation to the OCD by January 26, 1995. The report will contain:
  - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
  - b. A summary of the laboratory analytic results of water quality sampling of the monitor wells.
  - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
  - d. Geologic logs and as built well completion diagrams for each well.
7. LDNGC will notify the OCD at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
8. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec Office.

Please be advised that OCD approval does not relieve LDNGC of liability if contamination exists which is beyond the scope of the work plan or if the activities fail to adequately determine the extent of contamination related to LDNGC's activities. In addition, OCD approval does not relieve LDNGC of responsibility for compliance with 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 Office  
Shawn Adams, Contract Environmental Services