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APPROVALS

YEAR(S):

2001



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

January 29, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-4027

Ms. Cathleen Colby
Richardson Operating Company
1700 Lincoln St., Suite 1700
Denver, Colorado 80203

RE: CASE #3R0353
LOBO HATCH #1 SPILL
KIRTLAND, NEW MEXICO

Dear Ms. Colby:

The New Mexico Oil Conservation Division (OCD) has reviewed Richardson Operating Company's (ROC) November 15, 2000 "LOBO HATCH #1 SPILL, UNIT C, SECTION 14-T29N-15W, SAN JUAN COUNTY, NM". This document contains ROC's proposed plan to complete an investigation of the extent of remaining soil and ground water contamination related to remediation actions from a spill from a gathering line on the location of the Lobo (Lauritsen) Hatch #1 well site located in Unit C, Section 14, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico.

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

1. ROC shall install the ground water monitor well directly downgradient of the excavated area.
2. ROC shall complete the monitor well as follows:
 - a. At least 15 feet of well screen shall be placed across the water table interface with 5 feet of the well screen above the water table and 10 feet of the well screen below the water table.
 - b. An appropriately sized gravel pack shall be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.
 - c. A 2-3 foot bentonite plug shall be placed above the gravel pack.
 - d. The remainder of the hole shall be grouted to the surface with cement containing 3-5% bentonite.

- e. A concrete pad and locking well cover shall be placed at the surface.
 - f. The well shall be developed after construction using EPA approved procedures.
3. No less than 48 hours after the well is developed, ground water from the monitor well shall be purged, sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene, total dissolved solids (TDS) and major cations and anions using EPA approved methods and quality assurance/quality control (QA/QC).
4. All wastes generated during the investigation shall be disposed of at an OCD approved facility.
5. ROC shall submit the results of the investigation to the OCD by April 1, 2001. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Aztec District Office and shall include the following information:
- a. A description of all past and present investigation and remediation actions which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table map showing the location of the spill, excavated areas, landfarm, monitor wells and any other pertinent site features.
 - d. Summary tables of all past and present soil and ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data.
 - e. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve ROC of responsibility should the investigation actions fail to adequately define the extent of contamination related to ROC's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve ROC of responsibility for compliance with any other federal, state or local laws and regulations. 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