

**District IV - (505) 827-7131**

# BURLINGTON RESOURCES

SAN JUAN DIVISION

July 11, 2000

Mr. Jerrie Moore  
New Mexico Environmental Department  
Radiation Licensing and Registration Division  
Santa Fe, New Mexico 87502



RE: Proposed disposal method at San Juan 29-7 #79B of soil contaminated with frac fluids, sands, and radioactive tracer materials originating from the San Juan 29-7 #80A

Dear Mr. Floyd:

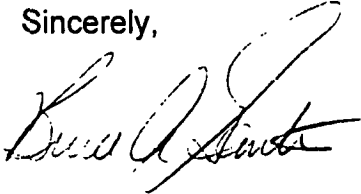
Pursuant to our telephone call on Tuesday, July 11, 2000. Burlington Resources Inc. respectfully requests permission to transport and permanently dispose of approximately 18 cubic yards of soil that was contaminated and temporarily placed into the blow pit at our San Juan 29-7 #80A well location into a similar pit at the San Juan 29-7 #79B location (Burlington Resources owns the surface). The #79B location already has an open blow pit from recent workover activity and it is our proposal to place the contaminated soils from the #80A location into the bottom of the #79B location pit and then to push the embanked native soils over this pit to close it. So as to minimize the chance for erosion and pooling of water over this pit, we would establish a soil cover of approximately 18-24 inches above grade over this pit using the embanked soils and, if necessary, adjacent soils. The #79B location is fenced except for two entrances which have cattle guards in place. We are also willing to place a fence around the blow pit once it is closed. Given that the radioactivity levels are sufficiently low to be considered below regulatory concern, no warning signs or markings are warranted. In total, we believe that these steps will adequately secure this material while it undergoes natural decay.

As you are aware this contamination resulted from a failure of a 7 inch liner in the San Juan 29-7 #80A well as our contractors were in the process of fracture stimulating the Lewis formation. Protechnics was injecting a radioactive tracer into the frac fluids during three stages of this fracture stimulation process and the failure occurred during the latter part of stage 2 and early part of stage 3. It is our estimate that approximately 3000 square feet of the surface was impacted and that removal of the top 1 – 2 inches of material will satisfactorily return the surface location to radiation levels at or below twice background.

We would appreciate your timely consideration and approval of this alternative disposal site as we are trying to satisfy the landowners desire to completely remove these contaminated soils. We will be willing to involve Protechnics in this transfer to the new site to assure that the removal from the San Juan 29-7 #80A is complete and that it is properly placed and secured at the location designated above.

If you need further information to consider this alternative disposal request, please contact me at 505-326-9842. Your assistance in this effort is sincerely appreciated.

Sincerely,



Bruce A. Gantner, PE  
Manager, Environmental, Health, and Safety

Cc: David Fish (Protechnics)  
Roger Anderson (Oil and Gas Division)  
~~Denny Foust~~ (Oil and Gas Division)  
Pat Bent, Chuck Smith, Bruce Voiles, John Caldwell, Rick Muncrief, John Zent (Burlington Resources)