PIT REMEDIATION & CLOSURE REPORT

THE STATE OF THE S

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

September 17, 1997

CERTIFIED MAIL RETURN RECEIPT NO. P-410-431-222

Mr. Mike Warren
Apache Corporation
3300 N. A, Suite 8220
Midland, Texas 79705

RE: FINAL PIT CLOSURE REPORTS

Dear Mr. Warren:

The New Mexico Oil Conservation Division (OCD) has completed a review of Apache Corporation's (AC) May 30, 1997 "PIT CLOSURE REPORTS" which were received by the OCD Santa Fe Office on September 16, 1997. These documents, which were submitted on behalf of AC by their consultant Indian Environmental Services, contain the results of the closure activities for 4 unlined oil and gas production pits in Lea County, New Mexico.

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

A. The pit remedial activities conducted at the sites listed below are satisfactory. However, according to the reports, onsite remediation of contaminated soil is still continuing at the sites. Therefore, the OCD cannot issue final closure approval and approval of closure actions at these sites is denied. Please resubmit final closure reports for these sites upon completion of the landfarming activities. The final reports will include the results of the soil remediation levels achieved, the laboratory analyses and associated quality assurance/quality control data and the disposition of the remediated soils.

1. South Jal Langlie Unit (Overflow pit)

Unit?, Sec. 17, T25S, R37E

2. State It (Overflow pit)

Unit F, Sec. 16, T26S, R33E

B. The final pit remedial contaminant levels at the sites listed below are in excess of the OCD's recommended remediation levels. Consequently, the OCD cannot issue final closure approval and approval of closure actions at these sites is **denied**. The OCD requires that AC submit

Mr. Mike Warren September 17, 1997 Page 2

a work plan to determine the extent of and remediate the remaining contamination at these sites. The work plan will be submitted to the OCD Santa Fe Office by October 17, 1997 with a copy provided to the OCD Hobbs District Office.

1. Skelly Penrose A Unit (Overflow pit)

Unit ?, Sec. 03, T23S, R37E

2. New Mexico BZ State (Overflow)

Unit?, Sec. 16, T23S, R37E

- C. The OCD has noted some serious errors in reporting the depth to ground water on the pit closure reports. The report forms for each site list the depth to ground water as greater than 100 feet. However, a review of readily available ground water information in the vicinity of these sites shows that the depth to ground water at all of the sites, except the "State It" site, is between 50-100 feet. This error causes the remediation levels for these sites to be greatly in excess of what the true recommended remediation levels should be under the OCD's "SURFACE IMPOUNDMENT CLOSURE GUIDELINES". Please correct this information when the forms are resubmitted.
- D. In order for the OCD to enter pit closure data into a database system, the OCD requires that an OCD "PIT REMEDIATION AND CLOSURE REPORT" form (attached) be submitted for each pit closed. Please provide these completed OCD forms, including appropriate 1/4, 1/4 section locations, when resubmitting the pit closure actions for approval.

To simplify the approval process for both AC and OCD, the OCD requests that AC submit all future pit closure reports only upon completion of all closure activities including onsite landfarming or composting of contaminated soils. The reports will include a completed OCD "PIT REMEDIATION AND CLOSURE REPORT" form and all pertinent information related to the extent of contamination, the results of the soil remediation levels in the pits and landfarms, all laboratory analyses and associated quality assurance/quality control data and the disposition of all remediated soils.

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

Sincerely,

William C. Olson Hydrogeologist

Environmental Bureau

attachment

xc: OCD I

OCD Hobbs District Office
David Deardorff, New Mexico State Land Office
Fred Holmes, Indian Environmental Services

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SEP 16 1997

Environmental Bureau
Oil Conservation Division

NMOCD INTER-OFFICE CORRESPONDENCE

TO:

Bill Olson-Environmental Bureau, Santa Fe, NM

From:

Wayne Price-Environmental Engineer

Date:

September 11, 1997

Reference:

Apache Corporation

Subject:

Pit Closures:

Skelly Penrose A unit: 3-23s-37e.

NM BZ State: 16-Ts23s-R37e.

South Jal Langlie Unit: sec 7-Ts25s-R37e. State IT Lease (W. Of Jal): F-16-26s-33e.

Comments:

Dear Bill,

Enclosed are the original pit closure forms submitted by Apache. Apparently the originals came to the Hobbs office. Please refer to my field report letter dated June 26, 1996 (attached) for discrepancies that I found in the closure reports. I have also included the results of the most recent sampling event taken by Apache and witness by me.

We took bottom hole samples for locations at Skelly Penrose, NMBZ, and State IT Lease. The analyticals for these soil samples were supplied to me by Apache. For comparison please note I took field samples using the PID and obtained the following results.

Skell Penrose A Unit (SPAU); 11' deep, sampled soil using PID BTEX 460 ppm, medium to strong hydrocarbon odors, visual contamination.

NM BZ State: 16-Ts23s-R37e; 11' deep, sampled soil using PID BTEX 15.5 ppm, none to very slight hydrocarbon odor, no visual contamination.

State IT Lease (W. Of Jal): F-16-26s-33e; 8' deep, sampled soil using PID 43 ppm, no hydrocarbon odor, had earth smell of organic

material, no visual contamination.

After reviewing the pit closure reports I recommend approval for the following three sites;

NM BZ State: 16-Ts23s-R37e.

South Jal Langlie Unit: sec 7-Ts25s-R37e. State IT Lease (W. Of Jal): F-16-26s-33e.

As for the Skelly Penrose A unit: 3-23s-37e, I recommend that Apache install a monitor well in the center of the pit to determine if ground water has been impacted.

Chris Williams-NMOCD District I Supervisor

attachments-pit closure reports, analyticals.



INDIAN

rvices

FORWARD

FORW **Environmental Services**

May 30, 1996

Re:

State of New Mexico Oil Conservation Division District I P.O. Box 1980 Hobbs, New Mexico 88241

Pit Closure Reports

3703 Oakridge Ct. Midland, Texas 79707 Tele: (915) 520-2984 Fax: (915) 520-3172

To Whom it May Concern:

Please find enclosed two (2) copies of the Pit Closure Reports and required attachments for the following locations that are operated by APACHE Corporation:

- State IT Lease 1.
- 2. State BZ Lease
- 3. Penrose Battery A#1
- South Jal Langley Unit

As indicated on the routing header, a second copy has been forwarded to the OCD office in Santa Fe, NM.

Once received, would you please execute one copy and return to the address indicated above to acknowledge receipt of the document.

Thank you for your attention to this matter. Should you have any questions, please contact me at (915) 520-2968.

Sincerely

Fred Holmes Consultant

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SEP 16 1997

Environmental Bureau Oil Conservation Division Denied, onsoly Landforming

JUN 1 1 1996

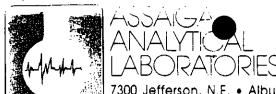
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			R	outi	ng							
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APACHE CO 2000 Post Oa Houston, Tex		I&S GRP.	×									
Operator:	APACHE CO	RPORATION	ATION Telephone : (915) 527-33						3311			
Address:	P.O. Box 848	Wink, Texas	7978	9								
Facility or Well Name: State It												
Location: Unit or Qtr/Qtr Sec. Sec 16 T 26S R 33E County Lea												
Pit Type:	Separator	Dehydra	tor		0	the	r: Ov	erflow	,			
Land Type:	BLM	State	Ì	x	Fe	е		Othe	г:	·		
PIT LOCATION (Diagram Attached)												
Pit Dimension	ons:	Length: 2	20'		Wid	lth:	20'		Q	epth:	10'	
Reference:		Wellhead			Oth	er:	sw	Corne	er			
Footage Fro	m Reference:	1'										
Direction Fre	om Reference:			- 1	25 De	gr	ees		E	ast	North	х
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distance from	Ground Water: n contaminants to evation of ground					50	feet 1	n 50 t to 99	feet	(1	0 Points) 0 Points)) Points)	0
Wellhead Protection Area: (Less than 200 feet from a private domestic water source, or; less than 1000 feet from all other water sources) Yes (20 Points) (0 Points)						0						
Distance to Surface Water: (Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches) Less than 200 feet (20 Points) (10 Points) (10 Points)						0						
							Rai	nking	Sco	re (To	tal Points):	0

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SEP 16 1997

101 1 1 1998

Date Remediation Started	I: 12/9	5			D	ate Comple	ted: In Progr	ess		
Remediation Method:	Exca	ation		х	Α	pprox. Cu.	Yds. : 25			
(Check all appropriate Sections)	Land	Farm	ed		lr	-situ Biorei	nediation			
	Other	: On-s	ite Bio	logica	al c	legradation				
Remediation Location: landfarmed onsite, name location of offsite facility)	(ie. and	Onsi	ite	х		Offsite:				
General Description of R	emedia	al Acti	on:							
Impacted soils from the pit were removed and placed into separate treatment cells. Excavated soils were then treated with nitrogen, water and surfactants to stimulate natural production of bacteria. Analysis of excavated area shows then interior of the pit to be less than 5000 ppm TPH. Once soils reach acceptable limits (less than 5000 ppm TPH), they will be used for construction material (ie: tank battery berms, etc.).										
Ground Water Encountered: No x Yes Depth:										
Final Pit Closure Sampling: (if multiple	Samp	Sample Location: Multiple Samples See Attached Analysis.								
samples, attach sample results and diagram of										
sample locations and	Samp	le De	pth:	14'	4'					
depths.	Samp	ole Da	te:	12/04		96	Sample Time:		1000	
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Total BTEX (ppm)	ND (PID(TPI	1			See	Attached	
Ground Water Sample	Yes		No	,	X	(If yes, atta	ach sample re	esults)	
I hereby certify that the infor	mation	above	is true	and	СО	mplete to the	e best of my	knowl	edge and belief.	
Date : 03/22/96	_				Pr	inted Name	Fred Holme	s		
Signature:					Tit	t ie : Consu	tant			
I hereby certify that the clo	I hereby certify that the closure of this site is approved and has been accepted									
Date: Printed Name:										
Signature:	_				Or	g. and Title	:			



MIDLAND, TX 79707

7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 • (505) 345-8964 • FAX (505) 345-7259

3332 Wedgewood, E-5 • El Paso, Texas 79925 • (915) 593-6000 • FAX (915) 593-7820

Report Generated:

January 4, 1996 09:59

CERTIFICATE OF ANALYSIS RESULTS BY SAMPLE

SENT INDIAN FIRE & SAFETY, INC. WORKORDER # : 9512113 TO: 3703 OAKRIDGE WORK ID : STATE IT

> CLIENT CODE : APA02

DATE RECEIVED : 12/11/95

ATTN: FRED HOLMES

Page: 1

Lab ID: 9512113-01A **Collected:** 12/04/95 09:30:00

Sample ID: EX-SWC Matrix: SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID	
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	3800 12/16/95	mg/Kg N/A	5.0	250	12/26/95	SLFTD55	-

Lab ID: 9512113-02A Collected: 12/04/95 09:30:00

Sample ID: EX-NWC Matrix: SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	3400 12/16/95	mg/Kg N/A	5.0	500	12/26/95	SLFTD55

Lab ID: 9512113-03A Collected: 12/04/95 09:30:00

Matrix: SOIL Sample ID: EX-CEN

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	5500 12/16/ 95	mg/Kg N/A	5.0	500	12/26/95 RE SA	SLFTDSS MPLED 1/8/96

Lab ID: 9512113-04A Collected: 12/04/95 09:30:00

Sample ID: EX-SEC Matrix: SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	ND 12/16/95	mg/Kg N/A	5.0	250	12/26/95	SLFTD55



Page: 2

Lab ID: 9512113-05A Sample ID: EX-NEC

Collected: 12/04/95 09:30:00

Matrix: SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	ND - 12/16/95	mg/Kg N/A	5.0	250	12/22/95	SLFTD56

Lab ID: 9512113-06A

Sample ID: TXH

Collected: 12/04/95 16:40:00 **Matrix:** SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	7700 12/16/95	mg/Kg N/A	5.0	250	12/22/95	SLFTD56

James A. Seely Operations Manager

JUN 1 1 1998

OFFICE

WORKORDER COMMENTS

JUH 1 1 1998 CCD HUBBS OFFICE

DATE

: 01/04/96

WORKORDER:

DEFINITIONS/DATA QUALIFIERS

The following are definitions, abbreviations, and data qualifiers which may have been utilized in your report:

ND = Analyte "not detected" in analysis at the sample specific
 detection limit.

D F = Sample "dilution factor"

NT = Analyte "not tested" per client request.

B = Analyte was also detected in laboratory method QC blank.

E = Analyte concentration (result) is an estimated value or exceeds analysis calibration range.

LIMIT = The minimum amount of the analyte that AAL can detect utilizing the specified analysis.

Please Note: Multiply the "Limit" value (AAL's Detection Limit) by Dilution Factor (D_F) to obtain the sample specific Detection Limit.

REPORT COMMENTS

Indian Fire & Safety, Inc. P.O. Box 1306 Hobbs, New Mexico 88241

Request for Analysis

Tele: (505) 397-3884 Fax: (505) 392-6274

EX-Dec 11 11			EX-SINC GRAB	Sample Number Type	Sampling Team: FRRY	Contact:		Job: State	Date: 12-8-95
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7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 • (505) 345-8964 • FAX (505) 345-7259

3332 Wedgewood, E-5 • El Paso, Texas 79925 • (915) 593-6000 • FAX (915) 593-7820

Report Generated:

January 29, 1996 08:41

CERTIFICATE OF ANALYSIS RESULTS BY SAMPLE

SENT INDIAN FIRE & SAFETY, INC.

TO: 3703 OAKRIDGE

MIDLAND, TX 79707 WORKORDER #

: 9601149

: JAL PIT CLOSURES WORK ID

CLIENT CODE : APA02

DATE RECEIVED : 01/19/96

ATTN: FRED HOLMES

Page: 1

JOB #95025

Lab ID: 9601149-01A

Sample ID: IT-C

Collected: 01/17/96 14:00:00

Matrix: SOIL

TEST / METHOD	RESULT	UNITS	LIMIT	D_F	DATE ANAL	BATCH_ID
HCs DIESEL/CAL DHS 8015M Diesel HCs DSL XT/CAL DHS 8015M	ND 01/23/96	mg/Kg N/A	5 .G	50	01/25/96	SLFTD061

es A. Seely erations Manager





Indian Fire & Safety, Inc. P.O. Box 1306 Hobbs, New Mexico 88241

Request for Analysis

Tele: (505) 397-3884 Fax: (505) 392-6274

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Additional Information or Remarks:	THE STATE OF THE S	Relinguish		Sample Number	Sampling Team: (10)	Contact: Y A H	Laboratory: ASSAGAI, ACS, N.M	July : dul	Date: 1/18/00	
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OFFICE	o Romani Campaesa	Time Received By: (Signature)		Analysis Requested	Date of Sampling Event:	Date Results are Needed: 0/25/96	Report To: T++S +CBBS	Proj Contact: FRED HOUMES	Client: ADACHI CORP.	
	Unalgio 9.45	Date Time		7000						

\$

WORKORDER COMMENTS

DATE : 01/29/96

WORKORDER:

DEFINITIONS/DATA QUALIFIERS

The following are definitions, abbreviations, and data qualifiers which may have been utilized in your report:

ND = Analyte "not detected" in analysis at the sample specific
 detection limit.

D F = Sample "dilution factor"

NT = Analyte "not tested" per client request.

B = Analyte was also detected in laboratory method QC blank.

E = Analyte concentration (result) is an estimated value or exceeds analysis calibration range.

LIMIT = The minimum amount of the analyte that AAL can detect utilizing the specified analysis.

Please Note: Multiply the "Limit" value (AAL's Detection Limit) by Dilution Factor (D_F) to obtain the sample specific Detection Limit.

REPORT COMMENTS







PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR APACHE CORP. ATTN: DON BAUCHAM P.O. BOX 848 WINK, TX 79789 FAX TO: 915-527-3321

Receiving Date: 08/29/97 Reporting Date: 09/02/97 Project Number: NOT GIVEN

Project Name: APACHE PIT CLOSURES

Project Location: STATE "IT", SEC. 16-T26S-R33E, UNIT F

Sampling Date: 08/29/97 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: AH Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)	CI (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DAT	TE:	08/29/97	09/02/97	08/29/97	08/29/97	08/29/97	08/29/97
H3164-1	STATE IT, 8' DEEP	833	368	<0.002	<0.002	<0.002	<0.006
Quality Control		194	484	0.096	0.095	0.089	0.261
True Value QC		200	500	0.090	0.090	0.087	0.260
% Accuracy		96.8	96.8	106	106	102	100
Relative Percer	nt Difference	0.6	0	3.0	2.3	1.3	1.1

METHODS:

TRPHC-EPA 600/749-020, 418.1; BTEX-EPA SW-846-8020; CI-EPA 600/4-79-020 352.3

Burgess J. K. Cooke. Ph. D.

Date



PHONE 9151673-7001 . 2111 BEECHWOOD . - 28151E. "4" 3803

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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POST OFFICE BOX 1980 HOBBS, NEW MEXICO 88241-1980 (505) 393-8161

NMOCD INTER-OFFICE CORRESPONDENCE

TO:

File of Apache Corporation.

From:

Wayne Price-Environmental Engineer

Date:

June 26, 1996

Reference:

Pit Closures

Subject:

Field Report

RECEIVED

JUL 1 8 1996

Comments:

Environmental Bureau
Oil Conservation Division

TO: Bill Olson-NMOCD Hydrogeologist-Environmental Bureau

Please find enclosed the findings of my recent field report for the Apache Pit closures. Mike Warren of Apache and I visited the sites.

Skelly Penrose A unit:

sec 3-Tslls-R37e

Took bottom hole sample PID (BTEX) approx. 175 ppm, wet soil due to recent rain, discharge pipe still leaking into pit area. Apache discovered that this pit had liner on sides only, pit bottom had no liner. Soil has mild hydrocarbon odor. NM St. Engr. office indicated ground water at 60-70 feet. Windmills in area to south and east.

Took pictures:

#1. Standing in pit looking east. Shows discharge from pipe.

#2. Pit area looking northwest.

#3-#6. Looking south- shows remediation areas for contaminated soils.

NM BZ STATE:

sec 16-Ts23s-R37e

Took bottom sample PID (BTEX) approx. 84 ppm, wet soil due to recent rain. Discharge pipe still in place. Apache will remove. Apache discovered that this pit had liner on sides only, pit bottom had no liner. Soil has mild hydrocarbon odor. NM St. Engr. office indicated ground water at 65-75 feet. Windmills nearby area located to southeast approx. 400 yards.

Took pictures:

#7. Looking east.

#8. looking north- show remediation area.

South Jal Langlie Unit:

sec 7-Ts 25s-R37e

The legal description on the pit closure is wrong location, actual is above. Took bottom sample PID (BTEX) approx. 12 ppm, wet soil due to recent rain. Discharge pipe still in place. Soil has no hydrocarbon odor. NM St. Engr. office indicated ground water at 55-65 feet. Windmills and Jal country club fresh water well nearby area located to east and south approx. 400 yards.

Took pictures:

#9. Looking Southeast.

#10 Looking south.

NM ST. IT:

unit f sec 16-Ts26s-R33e

Took bottom sample of pit PID (BTEX) approx. 140-160 ppm, wet soil due to recent rain. Roadway where condensate and water was being discharged by Amoco PID (BTEX) 45 ppm. Pit has mild to moderate condensate smell. NM St. Engr. office indicated ground water at 107-124 feet.

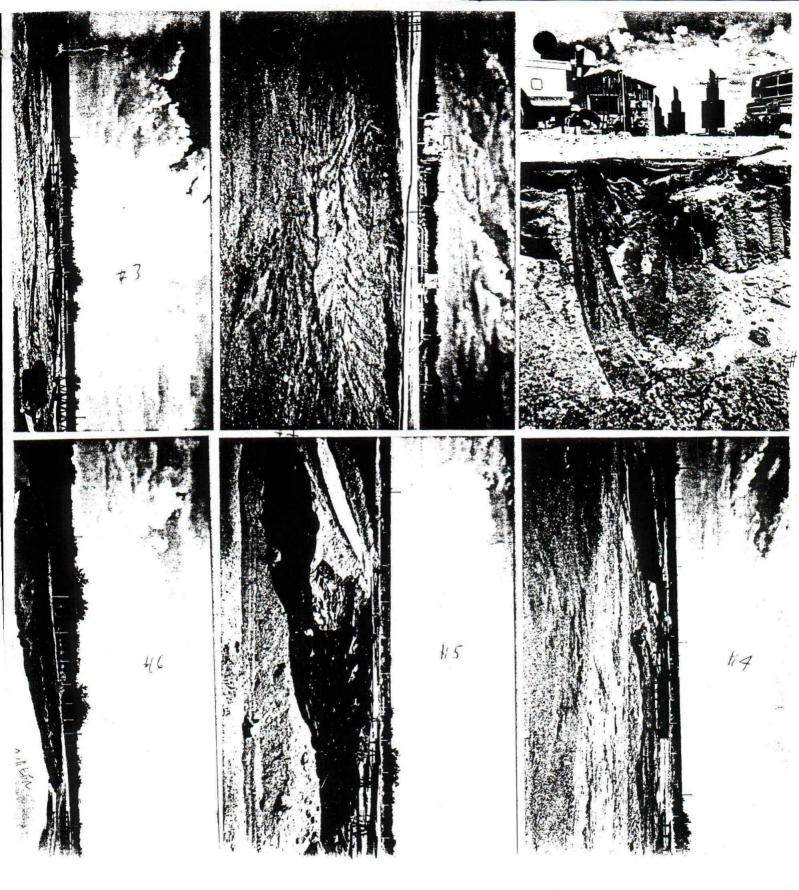
Took pictures:

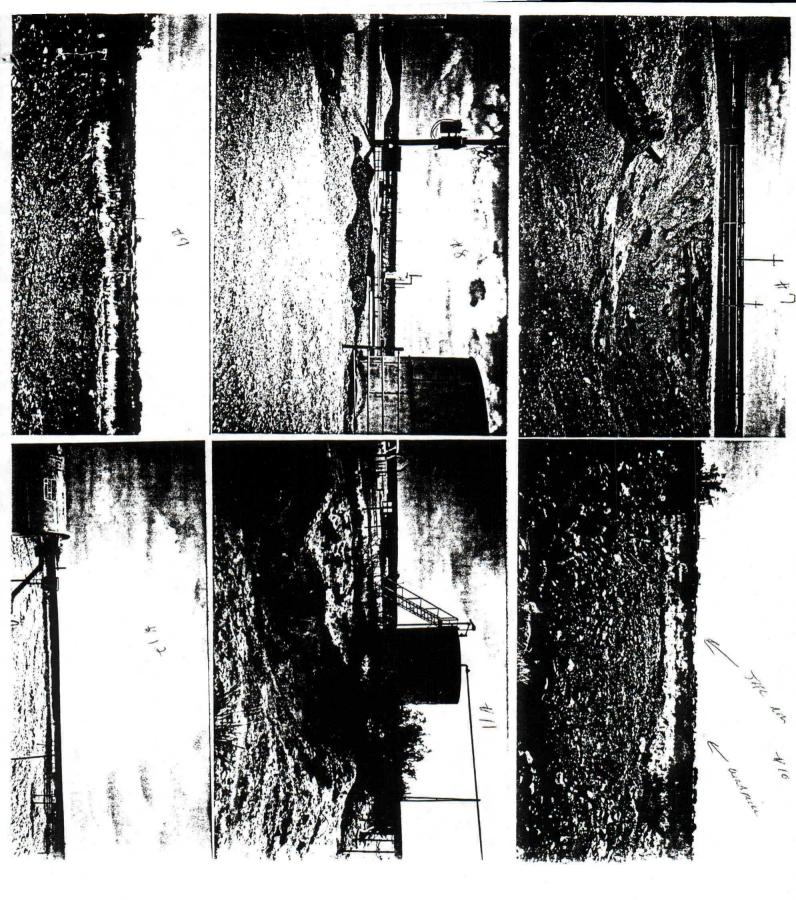
#11. Looking East. Shows pit and to right where tank water had been discharged into road.

#12. Looking North show remediation area.

cc: Jerry Sexton-NMOCD District I Supervisor Mike Warren-Apache Corp.

attachments-1 pictures







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1. Type of Well: WELL

2. Name of Operator 3. Address of Operator

PERFORM REMEDIAL WORK

TEMPORARILY ABANDON

PULL OR ALTER CASING

11.

OTHER:

State of New Mexico

Form C-103

DISTRICT P.O. Box 1980, Hobbs, NM 88240

DISTRICT_II
P.O. Drawer DD, Astesia, NM 88210

DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410

Energy, Minerals and Natural Resources Department

Appropriate	Mergy, mileras and manual resources Department	Revised 1-1-89
ISTRICT I O. Box 1980, Hobbs, NM 88240	OIL CONSERVATION DIVISION 310 Old Santa Fe Trail, Room 206	WELL API NO. 30-025-26978
ISTRICT II O. Drawer DD, Artesia, NM 88210	Santa Fe, New Mexico 87503	5. Indicate Type of Lease STATE FEE
STRICT III 00 Rio Brazos Rd., Aztec, NM 8741		6. State Oil & Gas Lesse No.
	OTICES AND REPORTS ON WELLS	
DIFFERENT RES (FORM	PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A ERVOIR. USE "APPLICATION FOR PERMIT" C-101) FOR SUCH PROPOSALS.)	7. Lease Name or Unit Agreement Name STATe "IT" No. "#/
Type of Well: Oil. GAS WELL WELL WELL	OTHER	3/4/ € 1/
Name of Operator APACH & CORP.		8. Well No.
Address of Operator (U N / T /) Well Location		9. Pool name or Wildcat
W	Feet From The Line and	Feet From The Lin
Section //e	Township 26-5 Range 33-E	NMPM County
	10. Elevation (Show whether Dr., Rab., Rr., GR., Etc.)	
	Appropriate Box to Indicate Nature of Notice, R	-
NOTICE OF IN	ITENTION TO: SUB	SEQUENT REPORT OF:
FORM REMEDIAL WORK	PLUG AND ABANDON REMEDIAL WORK	ALTERING CASING
PORARILY ABANDON	CHANGE PLANS COMMENCE DRILLING	OPNS. DUIG AND ABANDONMENT

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

OTHER:

CASING TEST AND CEMENT JOB

Sea attacked Workorders!!!

I hereby certify that the information above is true and complete to the best of my knowledge. SIGNATURE MAL Walter	and belief. TITLE PROD. 1-ORE MAN	DATE 10-11-95
TYPEORPRINT NAME MIKEWARREN	TELEPHONE NO.	
(This space for State Use)	The Geologist TV	12/1/95
CONDITIONS OF AFFROVAL & ANY: SEE Attached appropriate the control of the control	/	DAIL

OCD APPROVAL CONDITIONS FOR RCRA EXEMPT UNLINED PIT CLOSURES (August 16, 1995)

- 1. The following closure actions will be performed in accordance with OCD's February 1993 "SURFACE IMPOUNDMENT CLOSURE GUIDELINES":
 - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
 - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - c. Final soil contaminant concentrations in excavated and landfarmed areas will be determined upon completion of remedial actions.
 - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons.
- 2. All wastes removed from a site will be disposed of at an OCD approved facility.
- 3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to a pit closure.
- 4. Upon completion of all closure activities, a completed OCD "Pit Remediation and Closure Report" form containing the results of all pit closure and soil remediation activities will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site. To simplify the approval process, the OCD requests that the final pit closure reports be submitted only upon completion of all closure activities including onsite remediation or landfarming of contaminated soils.
- 5. All original documents will be submitted to the OCD Santa Fe Office for approval with copies provided to the OCD Hobbs Office.
- 6. OCD approval does not relieve you of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if the closure activities fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

Date: 10/3/95 Time: 09:38:11



* From: FRED HOLMES To: Mike Warren

Indian Fire & Safety, Inc. TELEFAX COVER SHEET

To: Warren, Mike		From : FRED HOLMES			
Fax Number : 1-915-52	27-3521	Company : Il: &S			
Date : 10/3/95	Time : 9:37:28	For Information Call: 520-2968	·····		
Subject : WordPerfect [c:\wpwin60\props\950		Fax Number : 520-3172			

Notice: The contents of this document are considered confidential and intended to be seen only by the individual or individuals addressed. If you have received this document in error, please contact us at 1-800-530-8693 and arrangements will be made for this document to be returned at our expense.

Mike:

Please find attached the cost estimate for the pit delineation. If you have any questions, please feel free to call me or Michael.

Thanks:

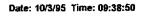
Fred Holmes

P.O. BOX 1306 HOBBS, NEW MEXICO 88241; TELE: 1-800-530-8693; FAX: 1-505-392-6274

P.O. Box 1306

Hobbs, New Mexico 88241 Tele: (505) 397-3884 Fax: (505) 392-6274

From: FRED HOLMES To: Mike Warren





October 2, 1995

Mr. Michael Bernard EH&S Group APACHE CORPORATION 2000 Post Oak Blvd. Houston, Texas 77056

Re: Estimated Cost for Pit Closures (Jal, New Mexico Area)

Proposal Number: 95025

Dear Mr. Bernard:

Pursuant to your request on September 29, 1995, and following site visits, we have prepared the following cost estimate for investigation and closure of four sites in the Jal, New Mexico region.

Site: STATE IT

Scope:

- Task 1: Perform a rough delineation of any contamination that may be present.
- Task 2: Take confirmation samples from the bottom and sides of the delineation trench.
- Task 3: Remove salt contaminated soil from southern edge of pad site, move soil to treatment area adjacent to main pad, take samples for clean-up confirmation.

ESTIMATED COST

Total Estimated Cost	\$3192.00
Misc. (plastic, sample shipping, photos etc.)	300.00
Mileage	90.00
PID Rental	125.00
Analysis ** (Cations, Anions, EC, SAR & ESP) 5 @ \$125.00 ca.	625.00
Analysis ** (TPH & BTEX) 5 @ \$160.00/ea.	900.00
Backhoe W/Operator & Dump Truck ** 8 hrs @ \$39.00/hr.	312.00
Environmental Scientist * 12 hrs. @ \$70.00/hr.	840.00

Date: 10/3/95 Time: 09:39:23

Page 3 of 5

Proposal 95025 Continued

Site: STATE BZ

Scope:

Task 1:

Remove Liner and take confirmation samples from below pit

Estimated Cost

Environmental Scientist * 12 hrs. @ \$70.00/hr. 700.00 Technician II, 2 @ 8 hrs./man x \$35.00/man/hr. 490.00 Backhoe W/Operator & Dump Truck ** 6 hrs @ \$39.00/hr. 234.00 Analysis ** (TPH & BTEX) 5 @ \$160.00/ea. 900.00 PID Rental 125.00 Mileage 80.00 Misc. (plastic, sample shipping, photos etc.) 175.00

Total Estimated Cost

\$2704.00

Site: **PENROSE**

Scope:

Task 1:

Remove liquids and sludge from the pit.

Task 2:

Remove pit liner and perform rough delineation.

ESTIMATED COST

Total Estimated Cost	\$3860.00
Misc. (plastic, sample shipping, photos etc.)	300.00
Mileage	200.00
PID Rental	250.00
Analysis ** (TPH & BTEX) 5 @ \$160.00/Sample	900.00
Backhoe W/Operator & Dump Truck ** 6 hrs @ \$39.00/hr.	390.00
Technician II, 2 @ 10 hrs./man x \$35.00/man/hr.	700.00
Environmental Scientist * 16 hrs. @ \$70.00/hr.	1120.00

Date: 10/3/95 Time: 09:39:52

From: FRED HOLMES To: Mike Warren

Proposal 95025 Continued

Site: SOUTH LANGLIE JAL UNIT

Scope:

Task 1:

Take down fencing, perform, rough delineation with backhoe.

Task 2:

Take confirmation samples for BTEX & TPH.

ESTIMATED COST

Total Estimated Cost	\$1995.00
Misc. (plastic, sample shipping, photos etc.)	125.00
Mileage	90.00
PID Rental	125.00
Analysis ** (TPH & BTEX) 5 @ \$160.00/Sample	900.00
Backhoe W/Operator & Dump Truck ** 5 hrs @ \$39.00/hr.	195.00
Environmental Scientist * 8 hrs. @ \$70.00/hr.	560.00

Notes

- * This time includes projected travel time and report preparation time. Travel time has been based upon the closest Indian portal which is Hobbs, New Mexico.
- ** Denotes charges that will be direct billed from third parties to APACHE.
- 1. Because of the size of the sites and limited scope, delineation will be performed using a backhoe.
- 2. Removal of debris and solid waste will be placed upon plastic to await proper disposal.
- 3. Removal of contaminated soils from delineation trenches will be placed back into the trenches pending further analysis.
- 4. Treatment costs for salt contaminated soils at the STATE IT Lease have been omitted pending receipt of the analyses. Cost range for treatment of this area could range from \$2800.00 \$4200.00 depending upon the salt levels and quantity of soil removed.

From: FRED HOLMES To: Mike Warren

Date: 10/3/95 Time: 09:40:24

Proposal 95025 Continued

5. The cost for analysis has been left elevated intentionally to allow some room for additional analysis if so desired. If this is not utilized, costs should reduce.

Thank you for contacting Indian to submit this proposal to you. Should you have any questions or need any additional information, please contact me at 1-800-530-8693.

Respectfully:

Tel Holmon

Fred Holmes