3R - 136

GENERAL CORRESPONDENCE

YEAR(S):

1999

BLAGG ENGINEERING, INC.
P.O. Box 87, Bloomfield, New Mexico 87413
Phone: (505)632-1199 Fax: (505)632-3903

November 12, 1999

Mr. Denny Foust
NM Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, NM 87410

Re: Request for Closure of Spill Reclamation
Dugan Production Corporation - Enniskillen No. 1
(G) Sec. 9 - T23N - R6W
Rio Arriba County, New Mexico

Dear Mr. Foust:

On behalf of Dugan Production Corporation, Blagg Engineering, Inc. (BEI) is requesting closure of a spill reclamation at the Enniskillen No. 1, (G) Sec. 9 - T23N - R6W, Rio Arriba County, New Mexico. A spill of approximately 100 barrels of hydrocarbons to the environment was discovered within a sub-grade fiberglass tank pit at the location. Between November 2 - 4, 1999 BEI directed excavations of hydrocarbon impacted soils at the spill. Contaminated media has been landfarmed on location.

A total of approximately 427 cubic yards of soil was excavated from the tank spill and placed into the landfarm. Due to the location of a gas sales line and processing equipment it was not feasible to remove all contaminated soils from the spill site. The vertical extent of impacts at the tank pit was established at 12 feet below grade based on field and laboratory test results.

An abandoned separator pit is located adjacent to the tank pit site. During reclamation of the spill, impacted soils in excess of closure standards were discovered to be associated with the abandoned separator pit. It is proposed to address remediation of these impacts when the well is plugged and abandoned.

A final request for closure of the spill reclamation will be submitted to the NMOCD following completion of landfarm activities. The landfarm will be tilled periodically until closure standards are achieved.

Questions or comments concerning this request for closure may be directed to Jeff Blagg at (505)632-1199.

Respectfully submitted:
Blagg Engineering, Inc.

Jeffrey C. Blagg, P.E.
President

cc: Mr. William Olson - NMOCD Santa Fe
Mr. Bill Liess - BLM Farmington
Mr. Tom Blair - Dugan Production Corp.

Attachements: Field Closure Report and Laboratory Test Reports

CLIENT: DUGAN PRODUCTION CORP.

BLAGG ENGINEERING, INC.
P.O. BOX 87, BLOOMFIELD, NM 87413
(505) 632-1199

LOCATION NO: _____
C.O.C. NO: 7551

FIELD REPORT: CLOSURE VERIFICATION

PAGE No: 1 of 1

LOCATION: NAME: ENNISKILLEN WELL #: 1 PIT: (SEPARATOR SPILL SITE)
QUAD/UNIT: G SEC: 9 TWP: 23N RNG: 6W PM: NM CNTY: RA ST: NM
QTR/FOOTAGE: 1650 FNL x 1650 FEL CONTRACTOR: BLAGG/3D

DATE STARTED: 11-2-99
DATE FINISHED: 11-4-99
ENVIRONMENTAL SPECIALIST: JCB

EXCAVATION APPROX. 30 FT. x 32 FT. x 12 FT. DEEP. CUBIC YARDAGE: 427
DISPOSAL FACILITY: ON SITE REMEDIATION METHOD: LANDFARM
LAND USE: BLM LEASE: NM 28736 FORMATION: _____

FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY 50 FT. S75E FROM WELLHEAD.
DEPTH TO GROUNDWATER: <50 NEAREST WATER SOURCE: 975' NEAREST SURFACE WATER: 975'
NMOCD RANKING SCORE: 20 NMOCD TPH CLOSURE STD: 100 PPM

CHECK ONE
___ PIT ABANDONED
___ STEEL TANK INSTALLED
___ FIBERGLASS TANK INSTALLED

SOIL AND EXCAVATION DESCRIPTION:

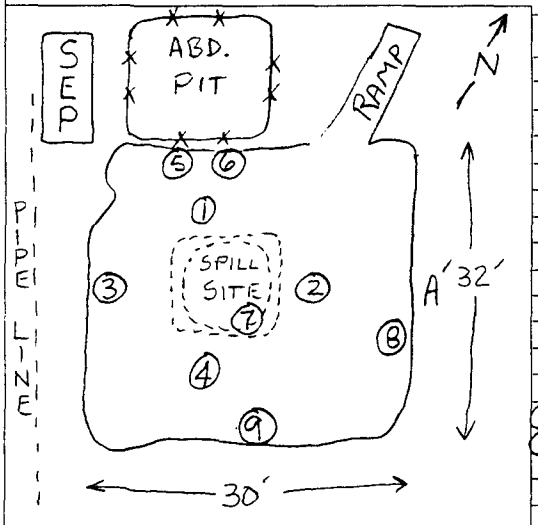
SILT, SAND & CLAY LENSES. DRY, FIRM, COHESIVE. HYDROCARBON STAIN & ODOR IN ORIGINAL SPILL PIT. MINOR RESIDUAL STAINING ON SIDEWALLS FOLLOWING EXCAVATION. ORIGINAL PIT APPROXIMATELY 12'X12'x 7' DEEP. FINAL EXCAVATION APPROXIMATELY 30'x 32'x 12' DEEP. PIPELINE TO WEST OF PIT RESTRICTING EXCAVATION.

FIELD 418.1 CALCULATIONS

TIME	SAMPLE I.D.	LAB No:	WEIGHT (g)	mL. FREON	DILUTION	READING	CALC. ppm

SCALE
0 FT

PIT PERIMETER



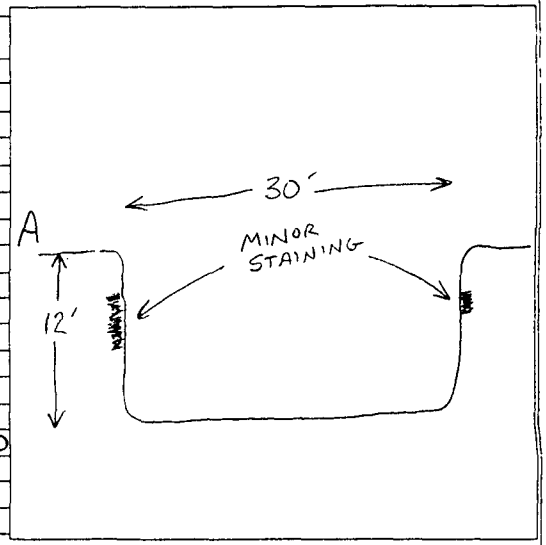
OVM RESULTS

SAMPLE ID	FIELD HEADSPACE PID (ppm)
1 @ 11'	ND
2 @ 11'	ND
3 @ 11'	ND
4 @ 11'	ND
5 @ 8'	18.5
6 @ 12'	6.4
7 @ 14'	48.4
8 @ 11'	20.6
9 @ 11'	44.2

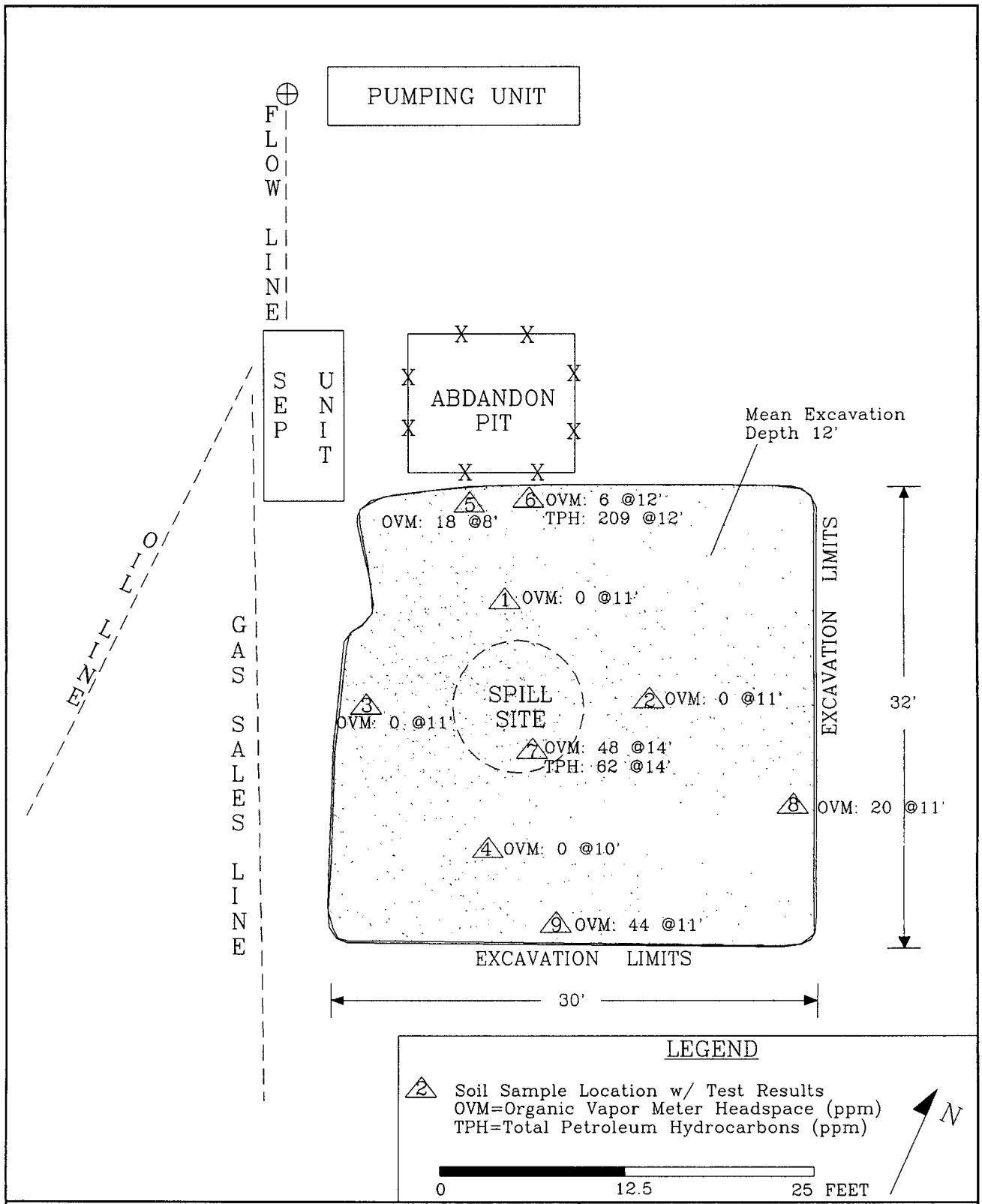
LAB SAMPLES

SAMPLE ID	ANALYSIS	TIME
(6) N @ 12'	8015	1140
(7) C @ 14'	8015	0950

PIT PROFILE



TRAVEL NOTES: CALLOUT: _____ ONSITE: _____



DUGAN PROD. CORP. – ENNISKILLEN NO. 1 (G) 9 – T23N – R6W, RIO ARRIBA CO., NM			*BLAGG ENGINEERING, INC.*
DATE: 11/99	FIGURE 1	BY: JCB	*P.O. BOX 87, BLOOMFIELD, NM* *PHONE: (505)632-1199*

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	Blagg / Dugan	Project #:	403410
Sample ID:	Tank Pit N @ 12'	Date Reported:	11-07-99
Laboratory Number:	G370	Date Sampled:	11-03-99
Chain of Custody No:	7551	Date Received:	11-04-99
Sample Matrix:	Soil	Date Extracted:	11-05-99
Preservative:	Cool	Date Analyzed:	11-05-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	**59.6**	**0.2**
Diesel Range (C10 - C28)	**149**	**0.1**
Total Petroleum Hydrocarbons	**209**	**0.2**

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Enniskillen #1.**

Analyst

Review

5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505 • 632 • 0615 • Fax 505 • 632 • 1865

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	Blagg / Dugan	Project #:	403410
Sample ID:	Tank Pit C @ 14'	Date Reported:	11-07-99
Laboratory Number:	G371	Date Sampled:	11-04-99
Chain of Custody No:	7551	Date Received:	11-04-99
Sample Matrix:	Soil	Date Extracted:	11-05-99
Preservative:	Cool	Date Analyzed:	11-05-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	**0.9**	**0.2**
Diesel Range (C10 - C28)	**61.8**	**0.1**
Total Petroleum Hydrocarbons	**62.7**	**0.2**

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Enniskillen #1.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	11-05-TPH QA/QC	Date Reported:	11-07-99
Laboratory Number:	G370	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	11-05-99
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
Gasoline Range C5 - C10	06-17-99	2.6200E-002	2.6173E-002	**0.10%**	**0 - 15%**
Diesel Range C10 - C28	06-17-99	2.7356E-002	2.7301E-002	**0.20%**	**0 - 15%**

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	**ND**	**0.2**
Diesel Range C10 - C28	**ND**	**0.1**
Total Petroleum Hydrocarbons	**ND**	**0.2**

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	**59.6**	**59.3**	**0.5%**	**0 - 30%**
Diesel Range C10 - C28	**149**	**148**	**0.3%**	**0 - 30%**

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	**59.6**	**250**	**309**	**100%**	**75 - 125%**
Diesel Range C10 - C28	**149**	**250**	**398**	**100%**	**75 - 125%**

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **QA/QC for samples G370 - G371.**

Analyst

Review

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CHAIN OF CUSTODY RECORD

7551

Client / Project Name	Project Location	ANALYSIS / PARAMETERS
BLAGG/DUGAN	ENNISKILLEN #1	
Sampler: J.C. Blagg	Client No. 04034.10	

Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix	No. of Containers	TPH 8015						Remarks
TANK PIT N @ 12'	11-3-99	1140	G370	SOIL	1	X						
TANK PIT C @ 14'	11-4-99	0950	G371	"	1	X						

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
J.C. Blagg	11-4-99	0740	Glenn L. Spencer	11.4.99	0742
J.C. Blagg - C @ 14'	11-4-99	1148	Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

ENVIROTECH INC.

5796 U.S. Highway 64
Farmington, New Mexico 87401
(505) 632-0615

Sample Receipt	Y	N	N/A
Received Intact	✓		
Cool - Ice/Blue Ice	✓		