

3R - 79

**APPROVALS**

**YEAR(S):**

---



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

June 23, 2006

Mr. Paul C. Thompson  
President, Thompson Engineering  
7415 East Main  
Farmington, NM 87402

**RE: ANNUAL GROUNDWATER MONITORING  
THOMAS #1 WELL LOCATION  
SECTION 30, T29N, R11W  
CASE 3R0079**

Dear Mr. Thompson:

The New Mexico Oil Conservation Division (OCD) has reviewed Thompson Engineering's (Thompson) Annual Ground Water Monitoring Report for the Thomas #1 well site submitted on April 12, 2006, by Animas Environmental Services and the letter that you submitted requesting site closure on May 12, 2006. Thompson requests written approval by the OCD of the closure of the Thomas #1 site located in Section 30, Township 29 North, Range 11 West, San Juan County, New Mexico. The OCD must reject Thompson's request because subsurface-water abatement can not be considered complete until the responsible person has demonstrated compliance with the Water Quality Control Commission (WQCC) abatement standards specified at 20.6.2.3103 NMAC for eight (8) consecutive quarterly samples or as approved by the director (see OCD Rule 19.B.4).

If Thompson feels that it is ready to demonstrate that the Thomas #1 site is ready for closure at this time, then it should do the following:

1. Resume quarterly monitoring for the next eight quarters at all five monitor wells.
2. Sample and analyze ground water for BTEX using EPA Method 8021B and TPH-GRO and TPH-DRO using EPA Method 8015B-Modified at all five monitor wells.

Mr. Paul C. Thompson  
June 23, 2006  
Page 2

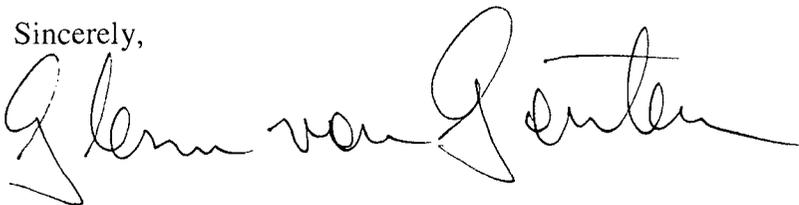
3. Submit a final ground water monitoring report within 60 days after completing the final quarterly sampling event. The report must contain:
  - a. A description of all activities conducted during the past year including conclusions and recommendations.
  - b. Quarterly water table elevation maps for the past year showing all monitor well locations and relevant site features and the direction and magnitude of the hydraulic gradient.
  - c. A tabular summary of all past and present water quality analyses.
  - d. An isoconcentration map of the maximum historical concentration and extent of benzene.

3. Thompson must notify the OCD at least 48 hours in advance of the scheduled activities such that the OCD has the opportunity to witness the events and split samples.

If Thompson demonstrates that the contaminated ground water at the Thomas #1 site can meet the WQCC and Rule 19 abatement standards, then OCD will approve Thompson's request to close this site. If Thompson does not feel that the site is ready for final closure, then it should continue its semi-annual monitoring program.

If you have any questions, please call me at (505) 476-3488.

Sincerely,



Glenn von Gonten  
Senior Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

April 20, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-256**

Mr. Paul Thompson  
Walsh Engineering & Production Corp.  
7415 East Main  
Farmington, New Mexico 87402

**RE: GROUND WATER MONITORING  
THOMAS #1 WELL SITE**

Dear Mr. Thompson:

The New Mexico Oil Conservation Division (OCD) has reviewed Thompson Engineering's (TE) January 6, 1998 "THOMAS #1, SW SECTION 30, T29N, R11W". This document contains TE's request to modify the monitor well sampling schedule for the ground water contamination remedial actions at the Thomas #1 well site from semi-annually to every five years.

The above referenced request is approved with the following conditions:

1. TE will continue to sample and analyze ground water from monitor wells MW-2 and MW-3 for benzene, toluene, ethylbenzene and xylene on a semi-annual basis.
2. TE will submit an annual ground water monitoring report to the OCD by April 1 of each year. The report will contain:
  - a. A description of all activities conducted during the past year including conclusions and recommendations.
  - b. Semi-annual water table elevation maps for the past year showing all monitor well locations and relevant site features and the direction and magnitude of the hydraulic gradient.
  - c. A tabular summary of all past and present water quality analyses, including the past years laboratory analytical results of water quality sampling and all quality assurance/quality control data.
  - e. The disposition of all wastes generated.

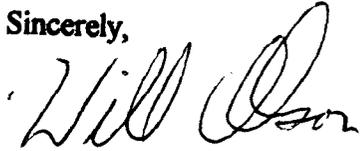
Mr. Paul Thompson  
April 20, 1998  
Page 2

3. TE will notify the OCD at least 48 hours in advance of the scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve TE of liability if TE fails to adequately monitor contamination related to TE's activities. In addition, OCD approval does not relieve TE of responsibility for compliance with any other federal, state, local or tribal 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

Z 235 437 256

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	\$
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

July 2, 1992

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-690-155-071**

Mr. T.K. Hubele  
Mobil Exploration & Producing U.S. Inc.  
P.O. Box 633  
Midland, Texas 79702

**RE: MOBIL THOMAS #1 WELL SITE INVESTIGATION AND REMEDIATION  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Hubele:

The New Mexico Oil Conservation Division (OCD) has completed a review of Mobil's November 26, 1992 "THOMAS #1 WELL SITE, INVESTIGATION REPORT, SAN JUAN COUNTY, NEW MEXICO" which was submitted to OCD on March 19, 1992 and the May 18, 1992 "MOBIL THOMAS #1 RECLAMATION PROPOSAL". The documents contain the results of Mobil's site investigations and a proposal for remediation of petroleum contaminated soils and ground water.

The investigation appears to have determined the extent of petroleum contamination of soils and ground water related to Mobil's activities at the Thomas #1 lease site. The OCD approves of the recommendations contained in the May 18, 1992 reclamation proposal with the following conditions:

1. Highly contaminated soils removed from the site for disposal will be taken to an OCD approved disposal facility. ✓
2. Remaining soils with over 100 ppm ionizable organic vapors which are to spread on the surface will be spread in no greater than a six inch lift and will be have their contaminant levels monitored semi-annually to determine the effectiveness of their remediation. ✓
3. A report will be submitted to OCD within 60 days of completion of the soil excavation and soil venting installation detailing all activities performed. ✓

Mr. T.K. Hubele  
July 2, 1992  
Page 2

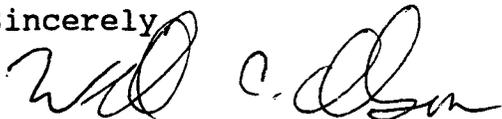
4. Semi-annual ground water monitoring will continue until ground water has been remediated to New Mexico Water Quality Control Commission ground water standards.
5. A semi-annual monitoring report containing all analytical results and water table elevations will be submitted to OCD within 60 days of sampling events.
6. Mobil will notify the OCD at least one week prior to all activities such that OCD may have the opportunity to witness events and/or split samples.

The OCD is concerned about the high levels of petroleum contaminated soils discovered at the dehydration pit on the Mobil Thomas #1 lease site and their potential effect on underlying ground water. The OCD understands that the dehydration unit and disposal pit is not owned by Mobil. The OCD requests that Mobil supply OCD information pertaining to the owner of the dehydration unit.

Please be advised that OCD approval does not limit Mobil to the work plan proposed should the remediation system fail to adequately remediate and contain petroleum contaminants related to Mobil's activities. In addition, OCD approval does not relieve Mobil of liability for compliance with any other federal, state, county and city laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson  
Hydrogeologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec Office  
Martin Nee, H+GCL