

39-23247



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March 22, 2002

Mr. Denny Foust
NMOCD
1000 Rio Brazos Rd.
Aztec, NM 87410

RE: Lindrith B 25 SWD

Dear Mr. Foust:

In regards to our conversation on March 22, Conoco is requesting approval to dispose of tank bottoms from the raw water and clear water tanks from the Lindrith B 25 SWD by one of the following options.

- 1) Remove solids from tanks and place in reserve pit in Lindrith area
- 2) Mix solid material, ie dirt, etc. with solids and landfarm on the Lindrith B 25 location or selected fee site in close proximity
- 3) Haul solids to an approved off-site disposal site (Basin or Envirotech)

Conoco currently has access to three reserve pits in the Lindrith area. Two of these are on private land with the third reserve pit being on a federal lease. All efforts would be taken to insure that majority of any hydrocarbon would be removed prior to placing in the reserve pit or landfarm if those options are approved. In addition, preventions would be taken to minimize odor and potential for combustibility due to the content of iron sulfide.

An analysis of solids was completed by Unichem in December 2001 which the results indicated that sludge is composed of 65% iron sulfide, 15% calcium carbonate, 17% non-acid solubles (sand, clays, etc.) and 3% hydrocarbon compounds.

The proposed procedure is to use a hot oil truck to remove as much hydrocarbon/liquid content as possible and then dispose of the solid material either by burial in a reserve pit or by landfarming. As stated above, precautions would be taken to minimize odors and the possibility of smoldering or combustion.

If you have any questions or need further information, please do not hesitate to call me at 505-324-5813 or John Cofer at 281-293-1494.

Sincerely,

Shirley L. Ebert
South Area FPS

Cc: Pat Hester - BLM
John Cofer - Conoco

