



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

August 26, 2003

Ms Brittany Benko  
BP America Production Company  
200 South Amoco Court  
Farmington, NM 87401

RE: Pits at GCU 213E (P&A Ell)

Dear Ms Benko:

The New Mexico Oil Conservation Division (OCD) has reviewed a submittal from Blagg Engineering dated August 20, 2003. The submittal describes BP America Production Company's (BP) difficulty with a private surface owner in gaining access to a P&A well site for sampling of an earthen pit. The well site is the Gallegos Canyon Unit 213E, M-8-T28N-R12W, that is located outside the defined vulnerable area. The earthen pit was covered without remediation during reclamation activities.

The OCD does not require approved closure for earthen pits outside the defined vulnerable area. Please note that OCD approval does not relieve BP of liability should contamination pose a future threat to surface water, ground water, human health or the environment. OCD approval does not relieve BP of compliance with other federal, state, tribal or local laws and regulations.

Yours truly,

Denny G. Foust  
Environmental Geologist  
[dfoust@state.nm.us](mailto:dfoust@state.nm.us)

DGF/mk

CC: Bill Olson OCD, Santa Fe  
Ray Sanchez BLM, Farmington  
DGF File  
Environmental File

*Bill Olson*

*Duplicate  
see Attachment  
not an original*

**BLAGG ENGINEERING INC.**

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

B. J. Olson  
A Hach to my  
August 26, 03 letter

August 20, 2003

Mr. Denny Foust  
New Mexico Oil Conservation Division  
1000 Rio Brazos Road  
Aztec, New Mexico 87410



Re: Request for Closure of Unlined Earthen Pit  
BP America Production Co.  
GCU 213E (Px A Well)  
(M) Sec. 8 - T28N - R12W, San Juan County, New Mexico

Dear Mr. Foust:

On behalf of BP America Production Company, Blagg Engineering, Inc. (BEI) is requesting approval for closure of a prior earthen pit located at the GCU 213E, (M) Sec. 8 - T28N - R12W, San Juan County, New Mexico. The well has been abandoned and the surface has been reclaimed. An unlined earthen pit was covered during surface reclamation activities and no sampling was conducted. BP is requesting closure of the pit without sampling. A site diagram, dated July 29, 1998, is attached.

This well is located on the privately owned Bolack Ranch. BP requested access to the site for sampling, but the surface rights owner has denied entry in order to limit potential vegetation impacts. He noted that there were no discharges to this pit when in use. BP does not dispute this claim, but will require regulatory approval to close the pit without sampling. BP understands that they may hold certain liabilities if future environmental impacts are discovered that were the result of discharges into the unlined pit. The pit is in a non-vulnerable area of the San Juan River watershed.

If your office cannot authorize this request then BP will need NMOCD assistance in gaining access for site sampling. If you have questions or need additional information, please contact myself at (505)632-1199 or Brittany Benko with BP at (505)326-9235.

Respectfully:

**Blagg Engineering, Inc.**

Jeffrey C. Blagg, P.E.  
President

Attachment: Site Diagram

cc: Brittany Benko - BP San Juan Op. Ctr.  
Marko Kechman - BLM Farmington  
Tommy Bolack - Farmington

Call Brittany