



D-26-30W-674

San Juan Operations Center

JULY 1, 1997

NMOCD
1000 RIO BRAZOS ROAD
AZTEC, NM 87410

ATTENTION: DENNY FOUST
#1
ELLIOTT SWD WELL AUDIT

Southern

Rockies

Business

Unit

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ENV. S

LISTED BELOW IS AMOCO'S RESPONSE CONCERNING THE ABOVE SUBJECT AUDIT. WE APPRECIATE YOUR TIME AND PATIENCE ON THESE ISSUES.

1. THE OIL, METHANOL, AND ANTIFREEZE TANKS HAVE BEEN REMOVED- SOIL REMEDIATION ON THIS SITE WILL BE COMPOSTING IN THE NW CORNER. IT WILL INCLUDE ALL STAINED SOILS WITHIN THE FENCE.
2. THE 95-BBL PIT DRAIN (PAN) WILL NOT BE USED FOR DISPOSAL OF EXCESS LUBE OILS. *-at end of lead line*
3. THE PUMP BLEED OFFS/TRUCK UNLOADING FACILITY WILL BE REVAMPED APPROPRIATELY TO ENSURE PROPER HANDLING OF OILS AND PRODUCED WATERS. *- is it mixing lube oils - Amoco will address this.*
4. ATTACHED ARE TEST REPORTS FOR MIXED WASTES.
5. ALL DRUMS WILL BE LABELED AND/OR RETURNED TO VENDORS.
6. ATTACHED IS THE WATER TEST FOR THE 95-BBL. PIT AREA.
7. ALL LIQUID WASTES ARE TAKEN TO BASIN DISPOSAL. PROPER TESTS OR SEPARATION OF WASTES WILL BE DONE.
8. BUNGS WILL BE PUT IN ALL STORED DRUMS.
9. THE TANK DIKE DOES CALCULATE OUT TO MORE THAN 1 1/2 TIMES THE VOLUME OF EACH STORAGE TANK. *Tanks connected over the top on p.*

WE ESTIMATE THAT ALL WORK WILL BE COMPLETED IN JULY. THANK YOU FOR YOUR HELP AND COOPERATION.

Buddy Shaw

BUDDY SHAW
ENVIRONMENTAL COORDINATOR
326-9219

ATTACHMENTS

SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	Amoco Production	Project #:	91412
Sample ID:	95 Barrel Drip Pan	Date Reported:	06-03-97
Lab ID#:	B366	Date Sampled:	05-30-97
Sample Matrix:	Liquid	Date Received:	05-30-97
Preservative:	Cool	Date Analyzed:	05-30-97
Condition:	Cool & Intact	Chain of Custody:	5251

Parameter	Result
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IGNITABILITY: **Negative**

CORROSIVITY: **Negative**

pH = 6.75

REACTIVITY: **Negative**

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RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
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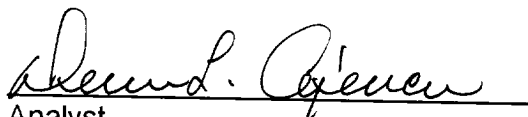
IGNITABILITY:	Characteristic of Ignitability as defined by 40 CFR, Subpart C, Sec. 261.21. (i.e. Sample ignition upon direct contact with flame or flash point < 60° C.)
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CORROSIVITY:	Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22. (i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)
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REACTIVITY:	Characteristic of Reactivity as defined by 40 CFR, Subpart C, Sec. 261.23. (i.e. Violent reaction with water, strong base, strong acid, or the generation of Sulfide or Cyanide gases at STP with pH between 2.0 and 12.5)
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Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: **Elliott SWD.**


Analyst


Review

Client:	Amoco Production	Project #:	91412
Sample ID:	Rain Water	Date Reported:	06-03-97
Lab ID#:	B365	Date Sampled:	05-30-97
Sample Matrix:	Water	Date Received:	05-30-97
Preservative:	Cool	Date Analyzed:	05-30-97
Condition:	Cool & Intact	Chain of Custody:	5251

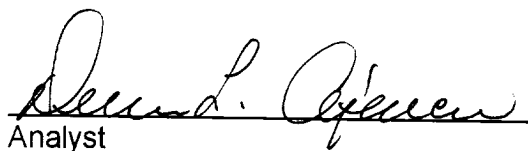
Parameter	Result
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Conductivity @ 25° C 472 umhos/cm

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Reference: "Standard Methods For the Examination fo Water And Waste Water", 18th ed., 1992.

Comments: Elliott SWD.


Analyst


Review

RCRA Hazardous Characteristics

Amoco Production Company

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Project ID: Elliot SWD
Sample ID: Elliot SWD
Laboratory ID: 7004
Sample Matrix: Aqueous

Sump

Date Reported: 07/03/97
Date Sampled: 05/30, 7/02/97
Time Sampled: 02 00
Date Received: 06/02 7/02/97

Parameter	Analytical Result	Units
General		
Ignitability.....	> 100	°C
Corrosivity (pH).....	9.0	s.d.
Reactivity		
Cyanide.....	< 0.01	mg/L
Sulfide.....	3.6	mg/L
Toxicity		
Arsenic.....	0.01	mg/L
Barium.....	32.3	mg/L
Cadmium.....	< 0.05	mg/L
Chromium.....	< 0.05	mg/L
Lead.....	0.34	mg/L
Mercury.....	< 0.002	mg/L
Selenium.....	< 1.0	mg/L
Silver.....	< 0.05	mg/L

Reference: Test Methods for Evaluating Solid Wastes, SW-846, United States
Environmental Protection Agency, Final Update I, July 1992.

Comments:

[Signature]
Review

DRAFT