Southern
Rockies
Business
Unit

D-26-30N-6W

San Juan Operations Center

JULY 1, 1997

NMOCD
1000 RIO BRAZOS ROAD
AZTEC,NM 87410

RECEIVED
JUL - 8 1997
OIL CON. DIV.
DIST. 3

ATTENTION: DENNY FOUST
#1
ELLIOTT SWD WELL AUDIT

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 load 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

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

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
IGNITABILITY:	**Negative**
CORROSIVITY:	**Negative** **pH = 6.75**
REACTIVITY:	**Negative**

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RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
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.)*
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)*
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)*

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments: **Elliott SWD.**

Analyst

Review

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ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Conductivity

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	
Conductivity @ 25° C	**472**	umhos/cm

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

Comments: **Elliott SWD.**

Analyst

Review

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RCRA Hazardous Characteristics

Amoco Production Company

Project ID:	Elliot SWD	Date Reported:	07/03/97
Sample ID:	Elliot SWD Sump	Date Sampled:	05/30, 7/02/97
Laboratory ID:	7004	Time Sampled:	02:00
Sample Matrix:	Aqueous	Date Received:	06/02 7/02/97

Parameter		Analytical Result	Units
General	Ignitability	> 100	°C
	Corrosivity (pH)	9.0	s.u.
	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:

Review

DRAFT