

3R - 400

**APPROVALS**

**YEAR(S):**

2005



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

3890400

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

Director

**Oil Conservation Division**

July 27, 2005

Mr. Ed Hasely  
Burlington Resources - San Juan Division  
P.O. Box 4289  
Farmington, NM 87499-4289

**RE: PROPOSED WORK PLAN - POSSIBLE GROUNDWATER ISSUES  
DAVIS #1  
CASE NO. 3R0400**

Dear Mr. Hasely:

The New Mexico Oil Conservation Division (OCD) has reviewed Burlington Resources' July 26, 2005 "*Proposed Work Plan - Possible Groundwater Issues - Davis #1.*" This document contains Burlington's notification of impacted soils and possible ground water contamination found during the resetting of facilities at its Davis No. 1 well site.

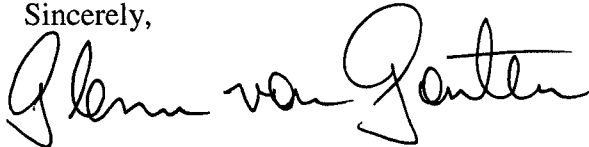
Burlington's work plan is approved with the following conditions:

1. The initial source area monitoring well(s) will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene (BTEX), total dissolved solids (TDS), major cations and anions and New Mexico Water Quality Control Commission (WQCC) metals.
2. BR will conduct all sampling and analysis activities using EPA approved methods and procedures including appropriate quality assurance/quality control (QA/QC).
3. All wastes generated will be disposed of at an OCD approved facility or in an OCD approved manner.
4. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec Office.

Please be advised that OCD's approval does not relieve Burlington of liability if contamination exists which is beyond the scope of the work plan, if the activities fail to adequately determine the extent of contamination; or if the activities fail to adequately remediate contamination related to BR's activities. In addition, OCD approval does not relieve BR of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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

Sincerely,

A handwritten signature in black ink, reading "Glenn von Gonten". The signature is fluid and cursive, with the first name "Glenn" being more prominent and the last name "von Gonten" written in a continuous script.

Glenn von Gonten  
Senior Hydrologist

xc: Denny Foust, OCD Aztec District Office

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**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2005

**BURLINGTON**  
**RESOURCES**  
San Juan Division

RECEIVED

JUL 27 2005

OIL CONSERVATION  
DIVISION

July 26, 2005

Glenn Von Gonten  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

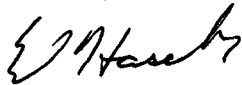
**RE: Proposed Work Plan – Possible Groundwater Issues  
Davis #1**

Dear Mr. von Gonten:

As we have discussed recently, Burlington Resources is submitting a proposed work plan for the Davis #1 well location. The location has a PNM ongoing groundwater project due to their earth pit closure in 1999. Burlington discovered impacted soils during facility reset work and has excavated to 32 feet. Groundwater has not been encountered in Burlington's recent excavation work.

I look forward to hearing from you on this matter. If you have questions or additional information is needed, please contact me at (505) 326-9841.

Sincerely,



Ed Hasely  
Environmental Advisor

Attachments –      Davis #1 Proposed Work Plan  
                             Davis #1 Site Map

cc:      Denny Foust - NMOCD Aztec  
         WFS - Mark Harvey  
         Bruce Gantner  
         Gregg Wurtz  
         Darren Randall  
         Facility and Correspondence Files

# **BURLINGTON RESOURCES WORK PLAN PROPOSAL (7/25/05)**

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## **Davis #1**

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### **SITE DETAILS**

Location: Unit Letter E, Section 11, Township 31N, Range 12W; San Juan County, New Mexico  
Land Type: Federal

### **PREVIOUS ACTIVITIES**

PNM had conducted pit closure work related to a dehydrator earth pit and installed monitoring wells on this site in 1999. During vertical extent determination under PNM's earth pit, a soil boring had shown impacted soils to a depth of 60 feet where groundwater was encountered (see PNM's Notification of Groundwater Contamination – Davis #1 dated March 12, 1999). A total of seven monitor wells were installed and sampling has taken place on a quarterly basis.

### **RECENT ACTIVITIES**

In July 2005, Burlington Resources (Burlington) excavated approximately 4940 cubic yards of impacted soil from an area near the water drain tank. Impacted soils were discovered in the area during the resetting of facilities. The excavation went to a depth of 32 feet and soils are still impacted at this depth. During the excavation work, one of PNM's monitoring wells (MW-3) had to be removed. The excavation is currently open and is approximately 60 feet by 70 feet by 32 feet deep.

### **PROPOSED WORK PLAN**

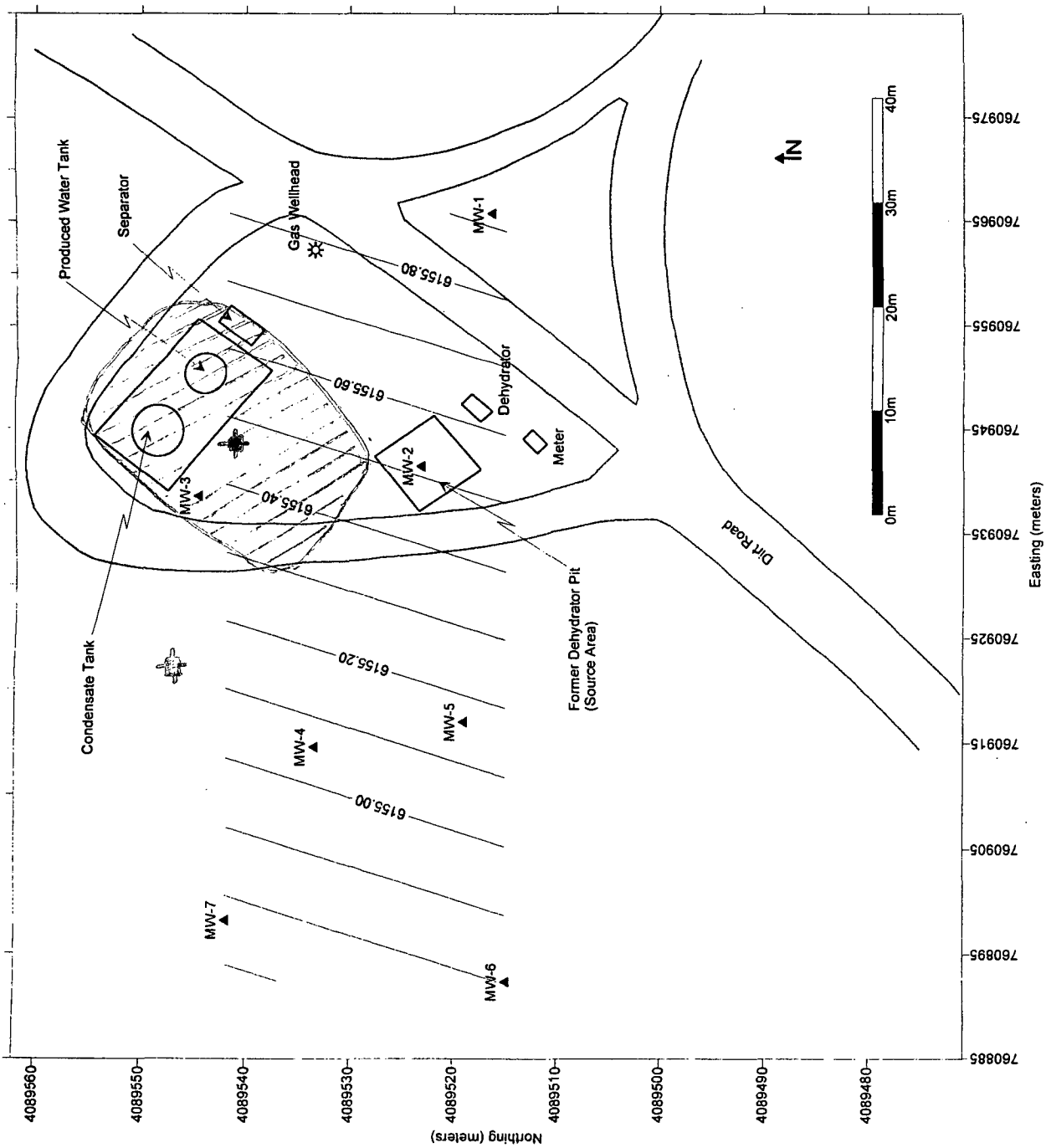
We have reached the practical extent concerning additional excavation. The existing excavation required the trackhoe to bench down to reach the current 32-foot depth. Safety concerns, along with the proximity of the excavation to existing pipelines, prevent Burlington from conducting soil removal to a greater depth.

Burlington proposes to excavate several trenches on a 5-foot spacing in the bottom of the open excavation to promote the remediation of the soils in place. After allowing time for aeration, an oxidizer will be added to the excavation and the excavation will be backfilled with clean soils.

After backfilling, a vertical extent soil boring will be conducted near the center of Burlington's excavation. If the boring shows impacted soils down to groundwater, then the boring will be cased and completed as a groundwater monitoring well / product recovery well (BR-1). If impacted groundwater is discovered beneath the excavation, then an additional monitoring well (BR-2) will be installed to the west-northwest (groundwater flow direction based upon PNM data) of Burlington's excavation. This monitoring well would be to the northeast of the existing PNM monitoring well (MW-4).

Based upon data collected from this work, Burlington will propose further action, if necessary.

Attachments: Site Map



- Budgetary boundaries (estimated) 7.05  
 Proposed Boundary / well (approximate)

Figure modified 7/05  
 by Evaluation Resources