



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Joanna Prukop
Cabinet Secretary
Acting Director
Oil Conservation Division

4/19/2004

Judah Oil
Att: James B. Campanella
P.O. Box 568
Artesia, N.M. 88211-0568

Re: Unlined Surface Impoundment approval.

Ut. B 2-22s-28e Ford State #1
Ut. A 21-18s-28e Lackawanna State Tank battery
UT.N 30-24s-29e MWJ State #1y
Ut.P 9-18s-28e Western State Battery
Ut. J 28-17s-28e Welch State #1 30-015-25703

Dear Mr. James B. Campanella,

The Oil Conservation Division has received the Unlined Surface Impoundment Remediation and Closure intents from Judah Oil dated 4/14/2004.

The unlined surface impoundment work plans are approved with the following stipulations added:

Ut. B 2-22s-28e Ford State #1 Tank battery

1. The site rating and total ranking score are not accepted. Ground Water information found the depth to ground water in T-22s R- 28e to be 30'-42' and the Recommended Remediation Action Level for TPH will be 100 ppm. , BTEX 50 ppm, & Benzene 10 ppm.
2. The unlined surface impoundment work plan as approved in this letter shall began actions as no later than 7/19/2004.

Ut. A 21-18s-28e Lackawana State tank battery

The unlined surface impoundment workplan is approved with the following stipulations added:

1. The site rating and ranking score are not accepted Ground Water information found the depth to ground water in T-21s R-28e to be 65' and the Recommended Remediation action Level for TPH will be 1000 ppm, 50 Btex , & Benzene 10 ppm.
2. The unlined surface impoundment workplan as approved in this letter shall began actions no later than 7/19/2004.

Ut. N 30-24s-29e MWJ State #1y Tank Battery

The unlined surface impoundment workplan is approved with the following added stipulations:

1. The site ranking criteria and total ranking score are not accepted Ground Water information found the depth to ground water in T-24s R-29e to be 18' and the Recommended Remediation Action Level for TPH will be 100 ppm, BTEX 50 ppm, & Benzene 10 ppm.
2. The unlined surface impoundment workplan as approved in this letter shall began actions no later than 7/19/2004.

Ut P 9-18s-28e Western State Tank Battery

The unlined surface impoundment workplan is approved with the following added stipulations:

1. The site ranking criteria and total ranking score are not accepted Ground water information found the depth of ground water to be 65' and the Recommended Remediation action level for TPH will be 1000 ppm, BTEX 50 ppm, & Benzene 10 ppm.
2. The unlined surface impoundment workplan as approved in this letter shall began actions no than 7/19/2004.

Ut. J 28-17s-28e Welch State #1

The unlined surface impoundment workplan is approved with the following added stipulations:

1. The site ranking criteria and total ranking score are not accepted Ground Water information found the depth to ground water to be 53' and the Recommended Remediaton Action Level for TPH will be 1000 ppm, BTEX 50 ppm, & Benzene 10 ppm.
3. The unlined surface impoundment workplan as approved in this letter shall began actions no later than 7/19/2004.

Soil samples will be taken for analytical at the conclusion of excavation actions in each unlined surface impoundment.

Landfarms onsite with ground water 50' in depth or less will be required to be on and impermeable liner of a min. of 40 mil. thickness.

Landfarming on location will be required to be within a bermed area and placed in 6" lifts. The soils should be disked regularly to enhance biodegradation of the containants. Only soil which do not contain free liquids can be land farmed.

Soil samples shall be taken for analytical no later than 180 days after the beginning of the onsite landform actions and there after no later than 90 days until the RRAL is confirmed and a final unlined surface impoundment closure report with attached analytical is submitted to O.C.D.

Please notify O.C.D. before unlined surface impoundment closure actions begin and soil samples are taken for analytical therefore giving O.C.D. the opportunity to witness.

If I can be of assistance in this matter please do not hesitate to contact me at 505-748-1283 or E-mail me at mstubblefield@state.nm.us.

Sincerely,



Mike Stubblefield
Environ. Eng. Spec.
E.M.N.R.D./O.C.D.

Environ. Eng. Spec.

E.M.N.R.D./O.C.D.