

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.P 9-18s-28e Western State Battery

30-015-02673

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.

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 accepted. The Recommended Remediation action level for TPH will be 5000 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.

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

Landfarming on location will be required to be within a bermed area and placed in 6" lifts. The soils should be disked regulary 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,

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Mike Stubblefield

Environ. Eng. Spec.

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