

Hope Monzeglio

From: Price, Wayne [WPrice@state.nm.us]
Sent: Wednesday, October 13, 2004 3:50 PM
To: Ed Rigie (E-mail)
Cc: Dave Cobrain (E-mail); Hope Monzeglio (E-mail); Foust, Denny
Subject: Giant Ciniza GW-032 plan amendments

Dear ED:

Please amend your permit section 9.0 to include the new nine BW pond perimeter wells and the new bore hole near pond #2. Update the Plant Site Drawing that was submitted in the Sept 2003 submittal to include all of the wells. Please mark the raw water wells by number and note if active or in-active.

Please modify your sampling protocol to include General Chemistry for the 9 BW wells and new bore hole near pond #2 next year. Also note on report if wells are dry.

OCD is requesting that you sample water well #2 since our records show that it has not been sampled since 1995. Amend your section 9 to include any water analysis that you have sampled during the year, i.e. SDWA requirements. Include a plan to sample the plant water wells. OCD suggest maybe rotating the sampling events each year.

Please amend your permit to include the sampling of the Pilot Center waste water condition #20 of permit. Include results in annual report.

Please amend your plan to include a perimeter search so we don't have an incident like Bloomfield.

Please submit photos and closure information for the RR Rack Lagoon for OCD approval.

Please submit information pertains to the cooling tower waste created during your last turn-around.

Please submit the additional analysis for the BW pond perimeter wells. Please identify these wells. When you submit analysis please include a drawing so we know which wells correspond to the analytical work.

Also make sure next years annual report contains all of the information requested in condition #21. Make Sure that Giant points out possible problems and make conclusions and recommendations. Failure to do this could result in civil penalties. Other words, do not bury a problem in the report. Giant's responsibility is to notify OCD of problems and make corrective actions.

Please submit this information by December 01, 2004.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us