



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

*Field Inspection Program  
"Preserving the Integrity of Our Environment"*

30-015-33555

15-Nov-05

**PURVIS OPERATING CO**

3101 N. Pecos St. POB 51990 79710-1990

Midland TX 79705

**LETTER OF VIOLATION - Inspection**

Dear Operator:

The following inspection(s) indicate that the well, equipment, location or operational status of the well(s) failed to meet standards of the New Mexico Oil Conservation Division as described in the detail section below. To comply with standards imposed by Rules and Regulations of the Division, corrective action must be taken immediately and the situation brought into compliance. The detail section indicates preliminary findings and/or probable nature of the violation. This determination is based on an inspection of your well or facility by an inspector employed by the Oil Conservation Division on the date(s) indicated.

Please notify the proper district office of the Division, in writing, of the date corrective actions are scheduled to be made so that arrangements can be made to reinspect the well and/or facility.

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***INSPECTION DETAIL SECTION***

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| Inspection Date | Type Inspection  | Inspector    | Violation? | *Significant Non-Compliance? | Corrective Action Due By: | Inspection No. |
|-----------------|------------------|--------------|------------|------------------------------|---------------------------|----------------|
| 11/14/2005      | Routine/Periodic | Chris Beadle | Yes        | No                           | 12/14/2005                | iCLB0531853515 |

**Violations**

Surface Leaks/Spills

Failure to submit proper documentation (Rul

**Comments on Inspection:** Water tank has overflowed impacting soils around un-bermed tank. Contamination has run off to the south east. Drilling pit remains open, oil is on the surface of fluids in the inner horse shoe, wood pallet and other debris are in the muds on east side of outer horseshoe. Liner breached in nothreast side of outer horseshoe, pit walls impacted by pit contents.

Remediation is required. All soil remediation activities that occur on location must comply with the soil remediation guidelines in OCD publication "Guidelines For Remediation of Leaks, Spills, and Releases". This document may be found on the NMOCD web site: [www.emnrd.state.nm.us/ocd](http://www.emnrd.state.nm.us/ocd), under Publications> Environmental Handbook> Miscellaneous Guidelines> Remediation of Leaks, Spills and Releases.

Notify NMOCD District 2 Office 48 hours prior to any remediation work or prior to taking samples where results of the samples may be submitted to the OCD. Site remediation must begin prior to December 14, 2005.

The NMOCD District II office does not have on file an approved Form C-144 for the registration or closure of this pit as required by NMAC 19.15.2.50. Please have in this office on or before December 14, 2005, a C-144 detailing your closure plan. This plan must include at a minimum:

1. That all excavations are to be delineated for any constituents of concern. This delineation must determine the vertical and horizontal extent of any impacted areas.
2. The NMOCD District II office is to be notified 24 hours prior to commencement of pit closure activities, delineation work, remediation actions and obtaining samples where analysis of such samples are to be submitted to the NMOCD. Failure to notify may result in a requirement to resample.
3. Delineation operations are to commence no later than December 30, 2005.
4. Manner in which the pit will be closed.
5. Fully completed C-144.

A remediation work plan may be required depending on the results of delineation sampling. All oils liquids in this pit must be removed immediately. Notify NMOCD District 2 Office when oil has been removed.

In the event that a satisfactory response is not received to this letter of direction by the "Corrective Action Due By:" date shown above, further enforcement will occur. Such enforcement may include this office applying to the Division for an order summoning you to a hearing before a Divison Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well. Such a hearing may result in imposition of CIVIL PENALTIES for your violation of OCD rules.

Sincerely,

  
Artesia OCD District Office

**Note:** Information in Detail Section comes directly from field inspector data entries - not all blanks will contain data.

\*Significant Non-Compliance events are reported directly to the EPA. Region VI, Dallas, Texas.

## ECO Notification

Date: Monday, November 14, 2005  
To: Environmental Compliance Officer, NMOCD District II  
From: Chris Beadle  
Subject: Esperanza 22 State Com 2 - 30-015-33555 - Purvis Operating

Violation Opened? ☒ Yes ☐ No Letter Sent? ☒ Yes ☐ No Incident Opened? ☐ Yes ☒ No n \_\_\_\_\_

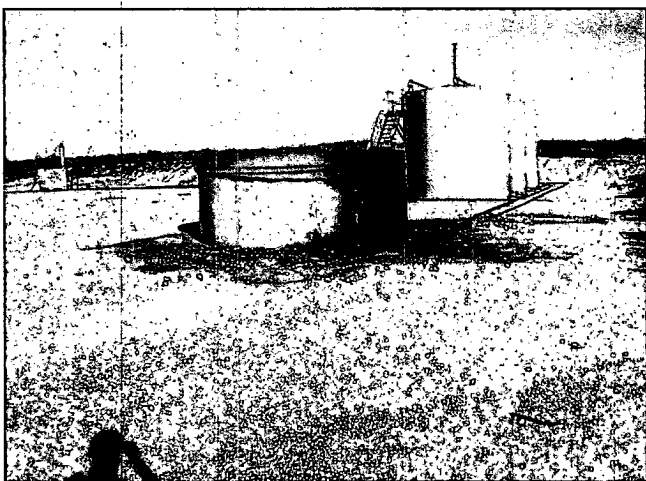


Photo of water tank, overflow and impacted soils.

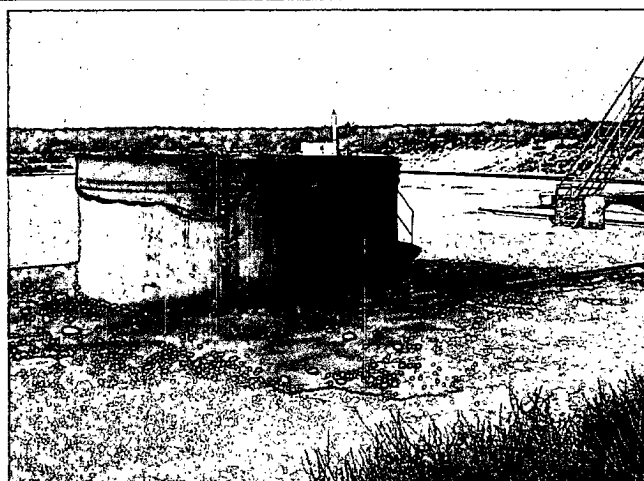


Photo of water tank, overflow and impacted soils.

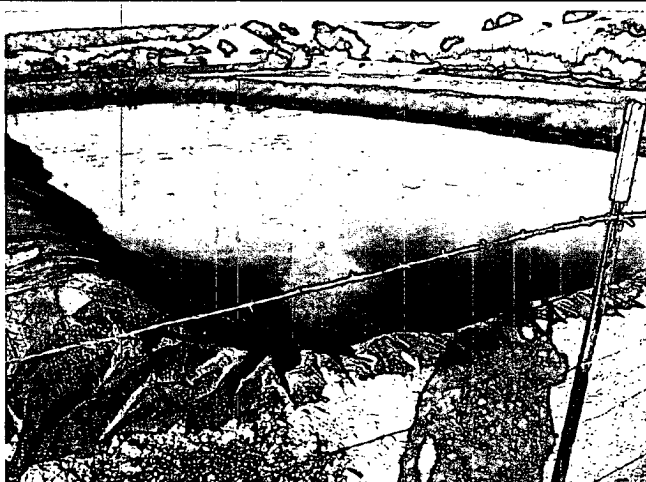


Photo of inner horseshoe of open drilling pit, oil on surface.



Photo of outer horseshoe, liner breached upper left, trash in contents.

# ***Purvis Operating Co.***

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3101 North Pecos Street – Midland, 79705

E-mail: eng@purvisop.com  
Mailing: P. O. Box 51990  
Midland, Texas 79710-1990  
Phone: (432) 682-7346  
Fax: (432) 683-9584

December 2, 2005

RECEIVED  
DEC 5 2005  
OCD-ARTESIA

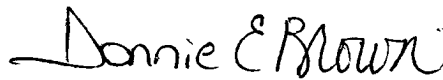
Mr. Chris Beadle  
Oil Conservation Division  
District II  
1301 W. Grand Avenue  
Artesia, NM 88210

Re: Esperanza 22 State Com #2, Eddy County, New Mexico

Dear Mr. Beadle:

Attached please find the completed Form C-103 for Esperanza 22 State Com #2 well, Eddy County, New Mexico.

Very truly yours,

  
Donnie E. Brown  
Petroleum Engineer

DEB\bao

Attachment

Submit 3 Copies To Appropriate District  
Office  
District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Ave., Artesia, NM 88210  
District III  
1000 Rio Brazos Rd., Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM  
87505

State of New Mexico  
Energy, Minerals and Natural Resources

OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-103  
Revised March 25, 1999

|   |
|---|
| WELL API NO.<br>30-015-33555  |
| 5. Indicate Type of Lease<br>STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/> |
| 6. State Oil & Gas Lease No.<br>032697  |
| 7. Lease Name or Unit Agreement Name:<br>Esperanza 22 State Com                                     |
| 8. Well No. 2   |
| 9. Pool name or Wildcat<br>LONETREE DRAW (WOLFCAMP)   |

SUNDRY NOTICES AND REPORTS ON WELLS  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A  
DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH  
PROPOSALS.)

1. Type of Well: Oil Well ☒ Gas Well ☐ Other ☐ RECEIVED
2. Name of Operator DEC 5 2005  
PURVIS OPERATING CO. OIL-ARTESIA
3. Address of Operator  
P O BOX 51990, MIDLAND, TX 79710-1990
4. Well Location

Unit Letter L : 1980 feet from the South line and 660 feet from the West line

Section 22 Township 21-S Range 27-E NMPM EDDY County

10. Elevation (Show whether DR, RKB, RT, GR, etc.)  
3267kB

11. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:

- PERFORM REMEDIAL WORK ☐ PLUG AND ABANDON ☐
- TEMPORARILY ABANDON ☐ CHANGE PLANS ☐
- PULL OR ALTER CASING ☐ MULTIPLE COMPLETION ☐

OTHER: ☒

SUBSEQUENT REPORT OF:

- REMEDIAL WORK ☐ ALTERING CASING ☐
- COMMENCE DRILLING OPNS. ☐ PLUG AND ABANDONMENT ☐
- CASING TEST AND CEMENT JOB ☐

OTHER: TEST PRODUCTION CASING ☐

12. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.

During workover operations, oil cut water was swabbed into the water tank. Spray of approximately 3 or 4 gallons discolored the pea gravel 4'-5' from the southeast side of the water tank.

Remediation Plan is to replace the affected pea gravel with fresh pea gravel. The affected pea gravel will be taken to a land farm.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Donnie E. Brown TITLE Petroleum Engineer DATE December 1, 2005

Type or print name Donnie E. Brown

Telephone No. 432-682-7346

(This space for State use)

APPROVED BY \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_

Conditions of approval, if any:



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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Cabinet Secretary

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

Director

**Oil Conservation Division**

Mr. Donnie E. Brown  
Purvis Operating Co.  
PO Box 51990  
Midland, TX 79710

December 8, 2005

## REMEDIATION WORK PLAN REQUEST - ESPERANZA 22 STATE COM NO 2

The New Mexico Oil Conservation Division District 2 Office is in receipt of your Form C-103 dated December 1, 2005 which provides information on the release at the Esperanza 22 State Com No 2 (30-015-33555). The Remediation Plan paragraph on this form is not sufficient for the NMOCD District 2 Office to assess this release and approve remediation work.

OCD Rule 19.15.3.116.D [NMAC] requires that the responsible person for a release must complete division approved corrective action and that releases will be addressed in accordance with a remediation work plan submitted to and approved by the division. This rule does not preclude the responsible person from taking appropriate actions to mitigate the impact of or contain a release prior to OCD approval but does require that site remediation activities be approved by the OCD.

To provide you with approval for corrective actions the OCD District 2 Office must first receive a remediation work plan that addresses the following:

- Site characterization, ranking, layout, and remediation action levels and to what levels remediation work will target at each phase (i.e. excavation, land farming, tilling);
- Release characterization including source, cause, prevention of future release, volumetric estimation of impacted area(s) and contaminant specific concerns;
- On site method of remediation including specific procedures for moisture/nutrients/additives to enhance biodegradation of the contaminants, specific to Highly Contaminated/Saturated Soils and Unsaturated Contaminated Soils;
- Off site remediation including sampling procedures for removed material, disposition of materials and documentation required;
- Notification to NMOCD of work/sampling and sampling procedures to be used for site characterization and final closure;
- General schedule of work to be performed including periodicity of repeated work such as tilling/moisture, etc; and,
- Site closure procedures (closure of excavations, reseeding, grading, etc).

**Please provide a remediation work plan for this release to the OCD District 2 Office prior to December 28, 2005.**

Please note that an extremely detailed report is not required for this release and all items listed above may not be specifically applicable to a small release. However, sufficient information to evaluate the impact of the release on the environment and to public safety is required. The OCD District 2 Office uses the "Guidelines For Remediation of Leaks, Spills, and Releases" to evaluate the adequacy of all remediation work plans submitted for approval. This guide may be found on our web site at:

<http://www.emnrd.state.nm.us/emnrd/ocd/EH-MiscGuidelines.htm> .

Please feel free to contact me if I can be of further assistance in this matter.

Chris Beadle

Artesia OCD District Office

# ***Purvis Operating Co.***

3101 North Pecos Street – Midland, 79705

E-mail: [land@purvisop.com](mailto:land@purvisop.com)  
Mailing: P. O. Box 51990  
Midland, Texas 79710-1990  
Phone: (432) 682-7346  
Fax: (432) 683-9584

December 13, 2005

Mr. Chris Beadle  
Oil Conservation Division  
District II  
1301 W. Grand Avenue  
Artesia, NM 88210

**RECEIVED**

**DEC 15 2005**

**ODD-ARTESIA**

Re: Esperanza 22 State Com #2, API No. 30-015-33555, Eddy County, NM

Dear Mr. Beadle:

During workover operations, oil cut water was swabbed into the water tank. Spray of approximately 3 or 4 gallons (I believe you estimated 2-3 barrels) discolored the pea gravel from the southeast side of the water tank.

Site characteristics obtained during site assessment indicate unsaturated contaminated pea gravel with ranking criteria as follows:

|  |   |          |
|--|---|----------|
| Depth to Ground Water Ranking Score          | = | 10       |
| Wellhead Protection Area Ranking Score       | = | 0        |
| Distance to Surface Water Body Ranking Score | = | <u>0</u> |
| Total  | = | 10       |

The affected area consists of 2 to 3 inches of pea gravel over 6 inches of compact caliche. Remediation Plans are to replace the pea gravel with fresh pea gravel. Take soil samples of the underlying caliche and test for BTAX and TPH. The affected pea gravel will be taken to a land farm.

Remediation work will start immediately.

Very truly yours,

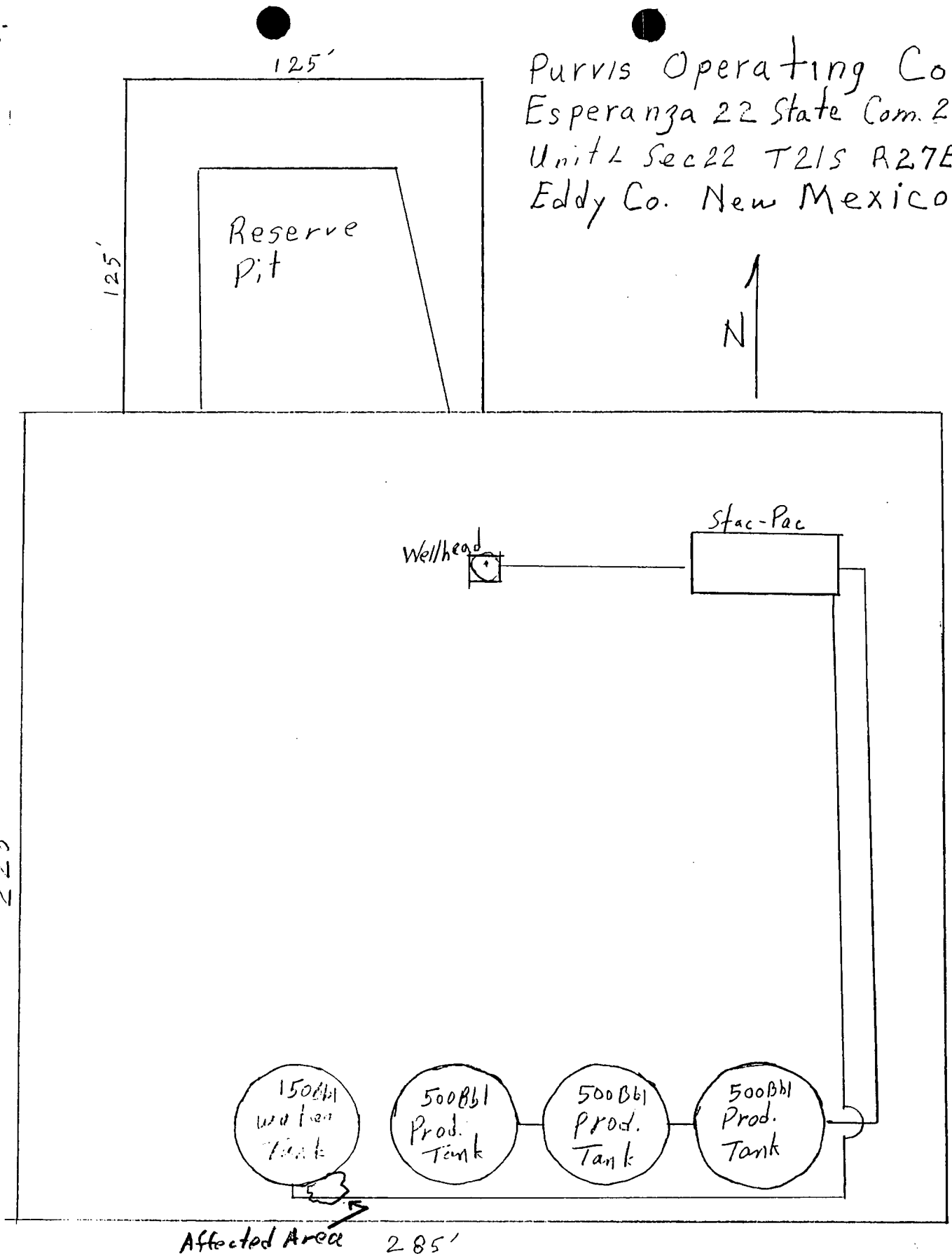
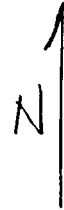


Donnie E. Brown, PE

DEB\bao

Attachments

Purvis Operating Co  
Esperanza 22 State Com. 2  
Unit 4 Sec 22 T21S R27E  
Eddy Co. New Mexico







# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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Cabinet Secretary

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

Director

**Oil Conservation Division**

Mr. Donnie E. Brown, PE  
Purvis Operating Company  
PO Box 51990  
Midland, TX 79710-1990

December 23, 2005

## REMEDIATION WORK PLAN APPROVAL - ESPERANZA 22 STATE COM NO 2

The New Mexico Oil Conservation Division District 2 Office is in receipt of your letter dated December 13, 2005 which provides an outline for work to remediate the release at the Esperanza 22 State Com No 2 (30-015-33555).

Your proposed method of remediation (hauling contaminated materials and replacing with clean material) is approved for this remediation under the following conditions:

- Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level. If soil action levels cannot practicably be attained, a detailed evaluation of risk may be performed and provided in writing to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.
- If alternate methods of remediation are to be used, prior approval from the OCD District 2 Office is required prior to beginning any work using these alternate methods. A specific proposal outlining the alternate methods must be submitted in writing.
- If ground water is encountered during the soil/waste characterization, excavation or remediation of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality and the OCD District 2 Office should be notified immediately.
- Notify OCD District 2 Office 24 hours prior to conducting work by Purvis Operating, contractors or sub-contractors that is intended to excavate, wash, move or disturb (such as in tilling, blading, etc.) soils or contaminated materials for the purpose of remediation, or hauling any soils or contaminated materials into or out of the location covered under this remediation work plan. This notification is to ensure NMOCD personnel are able to monitor compliance with approved remediation work plans as required by the New Mexico Administrative Code. Therefore, if a reasonable schedule of work cannot be provided then a separate notification that work is to resume is required if work ceases at the location for more than 5 days.
- Notify OCD District 2 Office 24 hours prior to obtaining samples where analysis of samples will be submitted to OCD.
- Upon termination of any required remedial actions, the area of a leak, spill or release may be closed, **after obtaining approval for the closure from the OCD District 2 office**, by backfilling any excavated areas, contouring to provide drainage, revegetating the area or other OCD approved methods. Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.