OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

April 9, 1998

CERTIFIED MAIL RETURN RECEIPT NO. P-326-936-416

Jolene Dicks PRONM Energy, Inc. 460 St. Michaels' Drive, Suite 402 Santa Fe, NM 87505

RE:

Produced Water Disposal Pit

Garcia Federal 26 #1

1710' FSL, 940' FWL, Sec. 26, T25N, R11W

Ms. Jolene Dicks:

The New Mexico Oil Conservation Division has received PRONM Energy, Inc letter to Mr Bill Leiss DOI-BLM dated April 2, 1998 and Sundry Notice. As stated in PRONM's letter the proposed produced water disposal pit will serve one well, Garcia Federal 26 #1, 1710' FSL, 940' FWL, Sec. 26, T25N, R11W., which is not in the Vulnerable Area.

According to OCD Rule 711.A.3.a, centralized facilities that receive wastes form a single well are exempt from permitting requirements. In addition, the proposed pit is not located in the Vulnerable Area and thus is not required by OCD to be lined.

However, pursuant to the OCD Order R-8952, all tanks exceeding 16 feet in diameter and all exposed pits and ponds shall be screened, netted or covered. Upon written application by the operator, an exception to screening, netting or covering of a facility may be granted by the district supervisor upon a showing that an alternative method will protect migratory birds or that the facility is not hazardous to migratory birds. In addition, OCD Rule 310 prohibits the storage or retention of oil in earthen reservoirs, or in open receptacles.

Please be advised that OCD approval does not relieve PRONM Energy Inc. of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve PRONM Energy Inc. of the responsibility for compliance with other federal, state and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

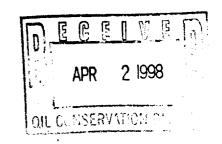
Martyne J. Kieling

Environmental Geologist

xc:

OCD Aztec Office





April 2, 1998

Mr. Bill Leiss
Department of Interior - Bureau of Land Management
1235 LaPlata Highway
Farmington, NM 87401

Re:

Sundry Notice dated March 16, 1998 (produced water disposal pit)

Gracia Federal 26 #1

1710' FSL, 940' FWL, Sec. 26, T25N, R11W

San Juan County, New Mexico

Dear Mr. Leiss:

In accordance with your field inspection and discussions with our representative Bud Guffey and me regarding the above-referenced Sundry Notice, enclosed please find a revised Figure 2 which illustrates the redesign for the pit for produced water for the Gracia Federal 26 No. 1 well.

Pro would build the new pit, using the old reserve pit as a starting point. The pit will be $35' \times 123' \times 10'$ deep. The perimeter will be fenced and, if required, lined with 8 mil. plastic, or other material as specified by the Bureau of Land Management.

As you suggested, I spoke with Martyne J. Kieling, Environmental Geologist at the New Mexico Oil Conservation Division. Ms. Kieling informed me that the pit for this one well is exempt from Rule 711 requirements, and that because it is not in the Vulnerable Area, the OCD does not require any lining. With a copy of this letter, I am sending Ms. Kieling a copy of our original Sundry Notice and revised Figure 2. She has advised that she will send a letter authorizing the pit. When I receive that authorization I will forward a copy to you.

If you need any additional information, please do not hesitate to call. Thank you for your assistance in this matter.

Sincerely,

Pro NM Energy, Inc.

Jolene Dicks

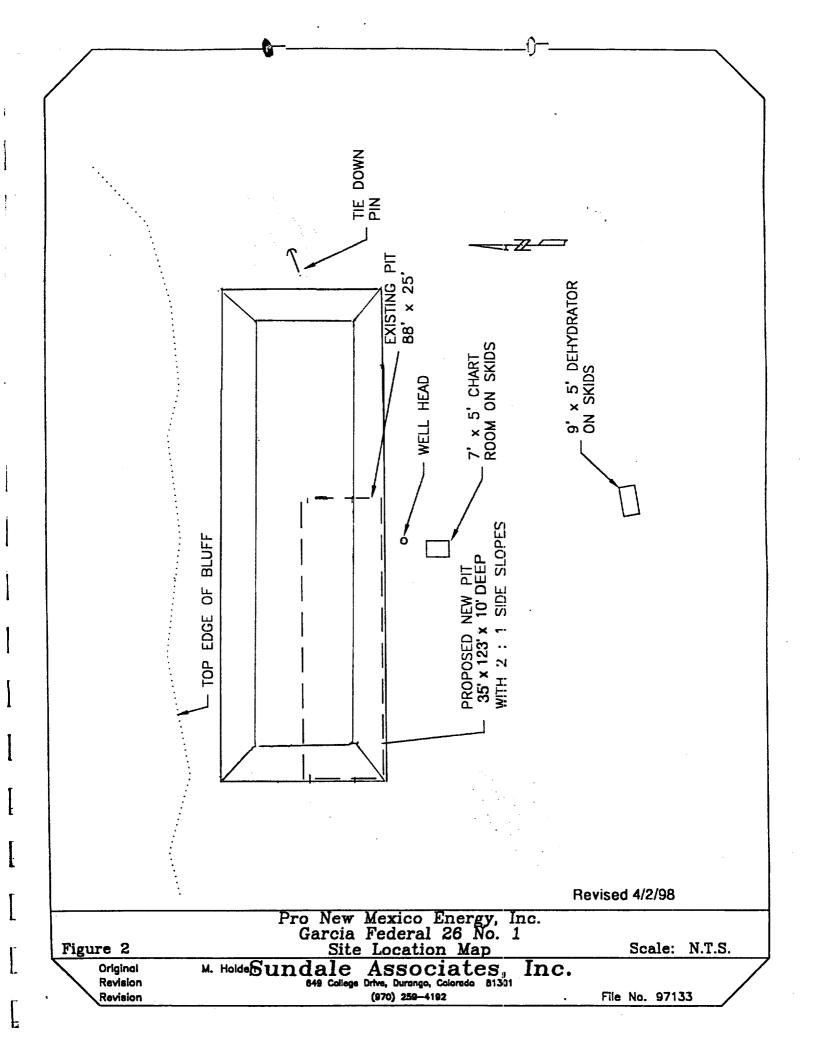
Director of Operations

CC:

Martyne Kieling, NMOCD

Bud Guffey

AZTEC



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BLM BURE, SUNDRY2NO Do not Ge in its form for proposa	UNITED STATES RTMENT OF THE INTERIOR AU OF LAND MANAGEMENT TICES AND REPORTS ON WELLS Is to drill or to deepen or reentry to a different re ON FOR PERMIT—" for such proposals	FORM APPROVED Budget Bureau No. 1004-0135 Expires: March 31, 1993 5. Lease Designation and Serial No. NMNMO 3 6 2 5 2 6. If Indian, Allottee or Tribe Name
070 FAMILIANI ON, MILES	UBMIT IN TRIPLICATE	7. If Unit or CA, Agreement Designation
3 Address and Telephone No. 460 St. Michael's 4 Location of Well (Footage, Sec., T., R., M., or 1710' FSL & 940' Section 26, T25N	FWL , R11W	Basin Fruitland Coal 11. County or Parish, State San Juan, NM
	BOX(s) TO INDICATE NATURE OF NOTICE,	REPORT, OR OTHER DATA
TYPE OF SUBMISSION	TYPE OF	ACTION
Notice of Intent	Abandonment	Change of Plans
Subsequent Report	Recompletion Plugging Back Casing Repair Altering Casing	New Construction Non-Routine Fracturing Water Shut-Off
The state of the s	Other	Conversion to Injection

Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

Pro NM Energy intends to remediate its 88' x 25' reserve pit and use it as a basis for a 14' x 132' x 5' deep open earth disposal pit for produced water. The proposed pit is more particularly described and its design set forth in the Environmental Data Report submitted herewith. No liquid hydrocarbons are present in the produced water.



(Note: Report results of multiple completion on Weil

011 CON. DIV. DIST. 3

Signed Certify that the foregoing is true and correct CRS	Title Director of Operations	APPA68VED
(This space for Federal or State office use) Approved by Conditions of approval, if any:	Title	Dat APR 2 8 1998

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States and the United States are under the United States and the United States are under the United States and the United States are under the Uni

ENVIRONMENTAL DATA COLLECTION REPORT FOR THE DEVELOPMENT OF AN UNLINED PRODUCTION WATER DISPOSAL PIT

93 MAR 17 PM 12: 23 070 FARMANGTON, NM

Natural Gas Production Site 1710 Feet From the South Line, 940 Feet from the West Line Section 26, Township 25 North, Range 11 West New Mexico Principal Meridian, San Juan County, New Mexico

Prepared for:
Pro NM Energy, Inc.
460 St. Michael's Drive, Suite 402
Santa Fe, New Mexico 87505

Prepared by: Sundale Associates, Inc. 605 East 7th avenue Durango, Colorado 81301

Wayne M. Dale,

Environmental Engineer New Mexico Ercense 10262

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PROJECT OBJECTIVES AND SCOPE

The purpose of this project was to collect the data required as part of an application for the development of an unlined production water disposal pit at a gas production site. The requirement for this data collection can be found in Volume 58, Number 172 on Page 47364 of the September 8, 1993 Federal Register.

- 1) A map of the site and scaled site drawings which show the pit dimensions, cross sections, side slopes, size and location relative to other site facilities.
- 2) The daily quantity of water to be disposed and a water analysis which includes the following parameters: total dissolved solids (TDS) in ppm, pH, oil and grease content, chlorides and sulfates.
- 3) The average monthly precipitation and evaporation for the general vicinity of the pit.
- 4) A percolation test performed in the planned pit location and a calculation of the estimated percolation rate of the pit.
- 5) Delineation of the estimated depth and extent of the shallowest aquifer, and the depth and extent of mineral deposits in the Facility area from State of New Mexico Oil Conservation Commission hydrologic and geologic data.

Sundale Associates' scope of services does not include any actual or implied evaluation of the environmental impact of the disposal of production water into an unlined pit.

GENERAL FACILITY LOCATION

This gas production facility, hereinafter referred to as the Facility, is located in the NW 1/4, SW 1/4 of Section 26, Township 25 North, Range 11 West, New Mexico Principal Meridian, San Juan County, New Mexico. The coordinates of the Facility are 1710 feet from the south line and 940 feet from the west line of Section 26. This information was obtained from a Pro New Mexico.

PIT DESIGN AND LOCATION

Figure 1 is a vicinity map for the Facility. A scaled facility site map is included as figure 2. This site map includes a scaled drawing of the proposed pit relative to site facilities and a scaled cross section of the pit which shows the interior slopes of the pit and exterior slopes of the protective berm around the pit. The design flow calculations and disposal pit design can be found in Figure 3 and 4.

The disposal pit has been designed such that a volume equal to the expected daily volume of 8,400 gallons could be contained. A permeability rate based on the existing pit absorption performance has been used to size the pit. No factor of safety has been applied to the expected daily flow since the permeability rate was a based on actual field results of an existing pit in the same location. The required absorption area based on this design flow is 3,750 square feet. To mitigate erosion and sloughing of the pit's side- walls, the sidewall slope has been reduced to 2:1 (two horizontal feet for each one vertical foot). This sidewall slope reduction enables the use of the sidewall area as absorptive area, which effectively adds to the absorptive capacity of the pit. The absorption capacity of the soil will lessen over time as finer silts and clays settling out of the water fill void spaces within the sand matrix. The pit should be monitored on a regular basis and maintained to assure proper working order. This may include the removal of the finer silts and clays in the surface soils.

DESIGN FLOW AND WATER ANALYSIS

The design flow into the disposal pit, according to Ms. Dicks of Pro New Mexico, Inc., is 200 barrels per day. Based on 42 gallons per barrel, a volume of 8,400 gallons per day is expected. The design flow is anticipated to be reduce as gas production of the well increases.

Water samples were collected by Pro New Mexico, Inc. personnel and were analyzed by CDS Laboratories located at 75 Suttle Street, Durango, Colorado. The samples were analyzed for the following parameters: sodium, potassium, calcium, magnesium, iron, total dissolved solids (TDS), pH, chloride, sulfate, hydroxide, carbonate, bicarbonate, conductivity, hardness, specific gravity, and oil and grease content. The laboratory data sheets have been included in the Appendix B.

EVAPORATION AND PRECIPITATION DATA

Average monthly precipitation and evaporation data were obtained from the New Mexico State University, Agricultural Science Center (ASC) at Farmington. The ASC evaporation and precipitation gaging station is approximately 20 miles northwest of the Facility, located south of the San Juan River Valley. Both the ASC gaging station and the Facility are situated on a high plateau, unprotected from sun or wind. It is likely that these two facilities have similar evaporation and precipitation rates based on their proximity and site similarity.

The ASC evaporation data was collected from 1972 through 1995 during the months of April through October. The average ASC monthly evaporation based on the average of the yearly evaporation rates for this period is 5.81 inches. The ASC precipitation data was collected monthly from 1969 through 1995. The average ASC monthly precipitation is .67 inches; however, the monthly high average of 1.02 inches for August and September was used for design purposes. Please refer to Figure 3 for a calculation of the Net Daily Average Water Design.

PERCOLATION RATE

A percolation test was performed on three (3) - five (5) foot deep percolation test holes. The soil in each test hole was similar and consisted of tan sand with less than thirty (30) percent fines from zero (0) to four (4) feet and tan sand with possible caliche or other mineral deposits from four (4) to five (5) feet. Each test hole was pre-soaked for a minimum of 24 hours before performance of the test. The percolation test was performed over a two (2) hour period. A permeability rate of 32 minutes per inch, or 28.0 gallons per day per square foot was obtained.

From field experience at the Facility, we have determined a more realistic permeability rate based on the performance of an existing pit in the same location as the pit described herein. The permeability rate of 3.6 inches per day per square foot or 2.2 gallons per day per square foot has been determined. The design based on permeability rather than a percolation rate gives a more conservative design. See Figure 3 for the percolation test data and net design water application rate.

HYDROLOGIC AND GEOLOGIC DATA

The State of New Mexico Oil Conservation Commission office in Aztec, New Mexico was accessed for hydrologic and geologic data.

Well boring data from two (2) wells located in the vicinity of the Facility were used to estimate formation depths. This information was obtained from a study entitled Hydrogeology and Water Resources of San Juan County Basin, New Mexico (W.J. Stone et. al.). The well data are presented below.

TABLE 1

WELL NUMBER	ELEVATION (FT)	FORMATION	DEPTH RANGE
122	5562	NACIMIENTO 60JO ALAMO KIRTLAND SHALE	0-450 450-650 650-1400
372	6768	NACIMIENTO	0-850
		OJO ALAMO	850-1050
		KIRTLAND SHALE	1050-1550
		FRUITLAND COAL	1550-1620

According to the USGS Huefano Trading Post SW Quadrangle topographic map, the surface elevation at the site is approximately 6722 feet.

The Department of Interior USGS, Hydrologic Investigation Atlas series was consulted for comparison to the Stone et. al. study and to obtain hydrologic data. All data presented below are given relative to the Facility location.

The Atlas HA-720-A, Hydrology of the San Jose, Nacimiento and Animas Formations (Levin and others) was consulted for information on the Nacimiento Formation (see Exhibit A). According to this atlas, the elevation relative to sea level of the bottom of the Nacimiento Formation is approximately 5600 feet, or approximately 560 feet below the ground elevation. The elevation of ground water in this area is approximately 150 to 165 feet below the ground surface. The potentiometric surface is approximately 6035 feet or 125 feet below the ground surface (see Exhibit B).

The Atlas HA-720-B, Hydrology of the Ojo Alamo Sandstone in the San Juan Structural Basin (Thorne and others) was consulted for information on the Ojo Alamo Formation (see Exhibit C). The elevation relative to sea level of the top of the Ojo Alamo Formation is approximately 5600 feet, or approximately 560 feet below the ground elevation.

Atlas HA-720-C provided data for the Kirtland Shale and Fruitland Coal formations (see Exhibits D and E). According to this atlas, the depth the top of the Kirtland Shale is approximately 750 feet. The approximate thickness of the Kirtland Shale and Fruitland Formation is approximately 950 feet.

Below is a table of estimated formation depths based on the USGS Atlas Series data presented above.

TABLE 2
ESTIMATE FORMATION DEPTH AT THE FACILITY

ELEVATION	FORMATION	DEPTH RANGE (FT)
6720	NACIMIENTO OJO ALAMO KIRTLAND SHALE FRUITLAND COAL	0-560 560-750 750-? ?-1700

The Nacimiento Formation is alluvial/fluvial sandstone and mudstone and the Ojo Alamo Formation is alluvial sandstone with minor mudstone deposits. The Nacimiento Formation is a potential aquifer but is not stipulated because only local sandstone bodies produce significantly (Stone et. al.).

The extent of the Nacimiento, Ojo Alamo, Kirtland Shale and Fruitland Coal Formations is presented in Exhibits A through E in the Appendix.

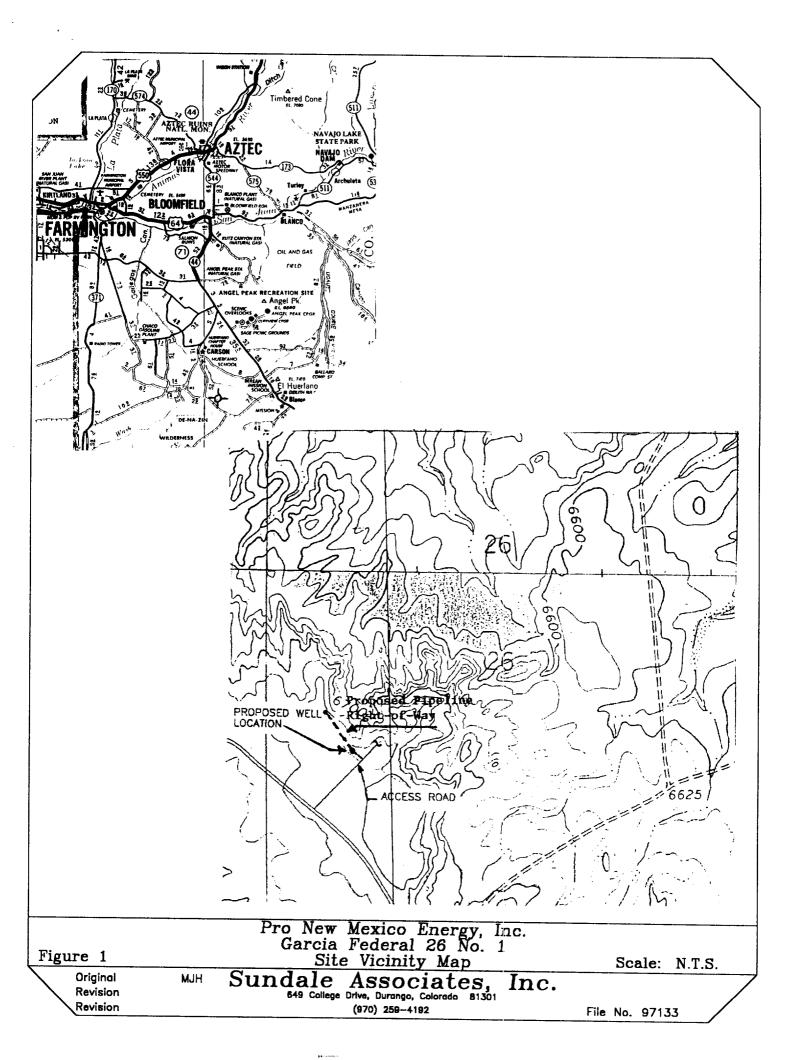
Both USGS and Oil and Gas Conservation Commission maps were consulted for information on mineral deposits. No mineral maps could be located which described mineral deposits, other than oil, gas and coal deposits, in the vicinity of the Facility.

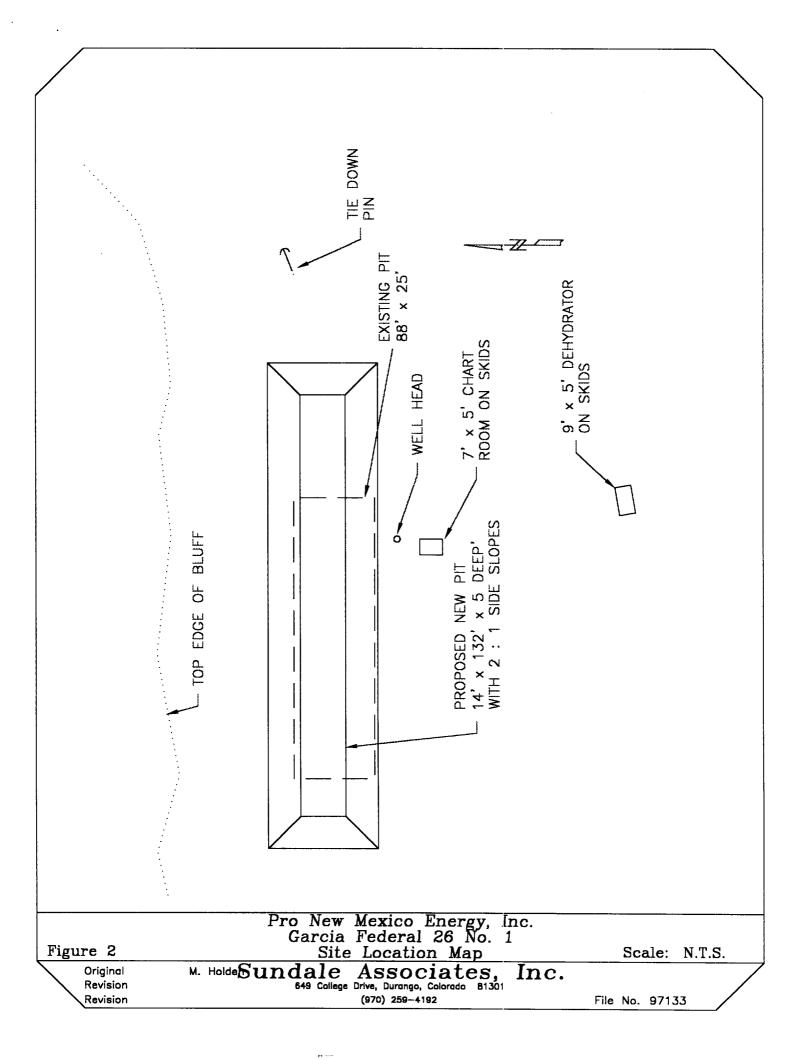
SUMMARY

A scaled drawing of the Facility, and plan and profile views of the production water disposal pit, have been included. The maximum daily quantity of water per day is 8,400 gallons. Water analysis results of the production water have been included in Page 1, Appendix B.

The average monthly precipitation in the vicinity of the Facility is 0.67 inches; however a value of 1.02 inches has been used for design purposes. A permeability rate as determined an existing pits performance at the Facility of 2.2 gallons per day per square foot, was obtained.

The New Mexico Oil Conservation Commission hydrogeologic data was accessed for information on aquifers and mineral deposits in the vicinity of the Facility. Ground water is expected within the unconfined Nacimiento Formation at approximate depths of between 150 and 165 feet. Geologic maps for the area did not describe any mineral deposits in the vicinity of the Facility other than the Fruitland Coal Formation. Based on information provided by Pro New Mexico Energy, Inc. it is estimated that this formation is located at an approximate depth of 1200 feet below the Facility. The extent of the Nacimiento, Ojo Alamo, Kirtland Shale and Fruitland Coal Formations is presented in Exhibits A through E in the Appendix.





SUNDALE ASSOCIATES, INC.

ENGINEERING AND TESTING (303) 259-4192 (505) 325-0769

PROJECT NAME CALCULATED BY REVIEWED BY REVISED

PRO NM ENERGY / GARCIA FEDERAL 26 No 1 **DATE** 3-4-'98 MJH

DATE 3-4-'98

DESIGN FLOW:

Measured Rate Barrel Size Calculated Rate Maximim Flow Factor of Safety Design Flow (Q)

200 Barrels / Day 42 Gallons / Barrel 8400 Gallons / Day 1.0

WMD

8400 Gallons / Day

EVAPORATION / PERCOLATION (E/P) RATES:

Permeability Rate =

3.6 INCH / DAY 2.2 GPD/SQ.FT

Lake Evaporation Rate: 70 Inches per Year =

0.12

GPD/SQ.FT

Monthly Rainfall (Maximum)

0.02

GPD/SQ.FT

Evaporation / Permeability Rate

2.34

GPD/SQ.FT

LAGOON SIZE:

Bed Area Size (Min) =

Design Flow / E/P Rate

3583.618 SQ.FT

Bed Area

25' x 150'

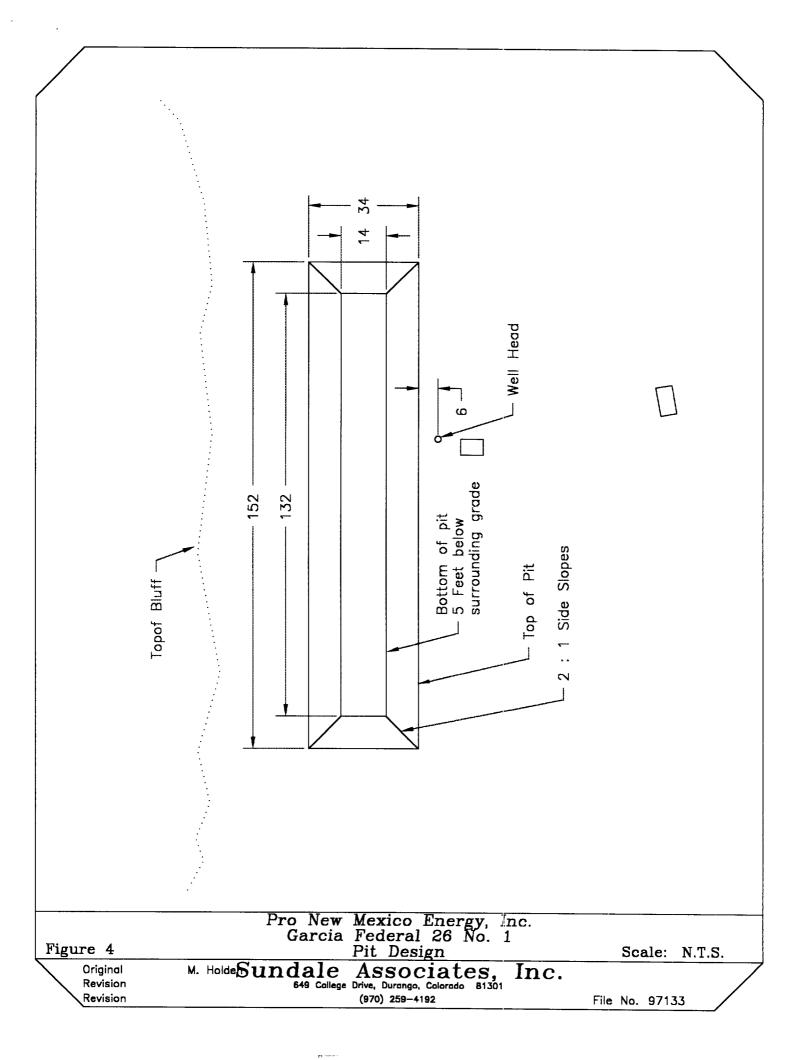
Alternate Bed Area

35' x 110'

Alternate Bed Area

45' x 85'

GENERAL BED DESIGN See Figure 4



SUNDALE ASSOCIATES, INC. Engineering and Testing

Sieve Analysis Results

Job No:

97133

Project:

Pro New Mexico - CR 7150

Sample No:

TH-1-1

Date Sampled:

12/4/97

Date Tested:

12/17/97

Depth, ft: 2.0

U.S. Sieve No.	- No.4 Weight Retained	+ No.4 Weight Retained	Cumulative Wt. Retained	% Passing, by Weight	U.S. Sieve No.
3"	0.0	0.0	0.0	100.0	3"
2 1/2"	0.0	0.0	0.0	100.0	2 1/2"
2"	0.0	0.0	0.0	100.0	2"
1 1/2"	0.0	0.0	0.0	100.0	1 1/2"
1"	0.0	0.0	0.0	100.0	1"
3/4"	0.0	0.0	0.0	100.0	3/4"
1/2"	0.0	0.0	0.0	100.0	1/2"
3/8 in	0.0	0.0	0.0	100.0	3/8 in
4	0.0	0.0	0.0	100.0	4
8	0.0	0.0	0.0	100.0	8
10	0.0	0.0	0.0	100.0	10
16	2.6	0.0	2.6	99.6	16
30	27.3	0.0	29.9	95.4	30
40	38.5	0.0	68.4	89.5	40
50	63.5	0.0	131.9	79.7	50
80	276.1	0.0	408.0	37.1	80
100	21.4	0.0	429.4	33.8	100
200	54.6	0.0	484.0	25.4	200
Pan	4.3	0.0	488.3	24.7	Pan
Wash	160.2	0.0	648.5		
Total	648.5	0.0			

USCS	Liquid	Plasticity
Classification	Limit	Index
SP	17	2

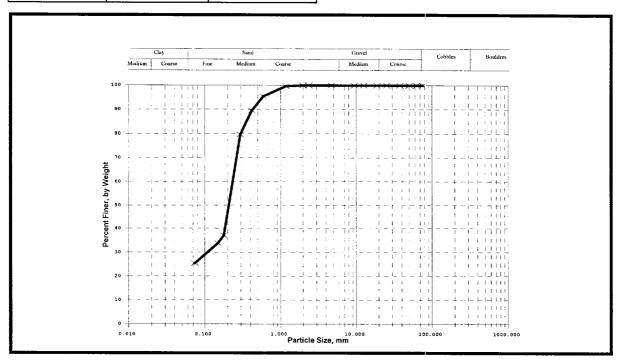


Figure 5

APPENDIX A

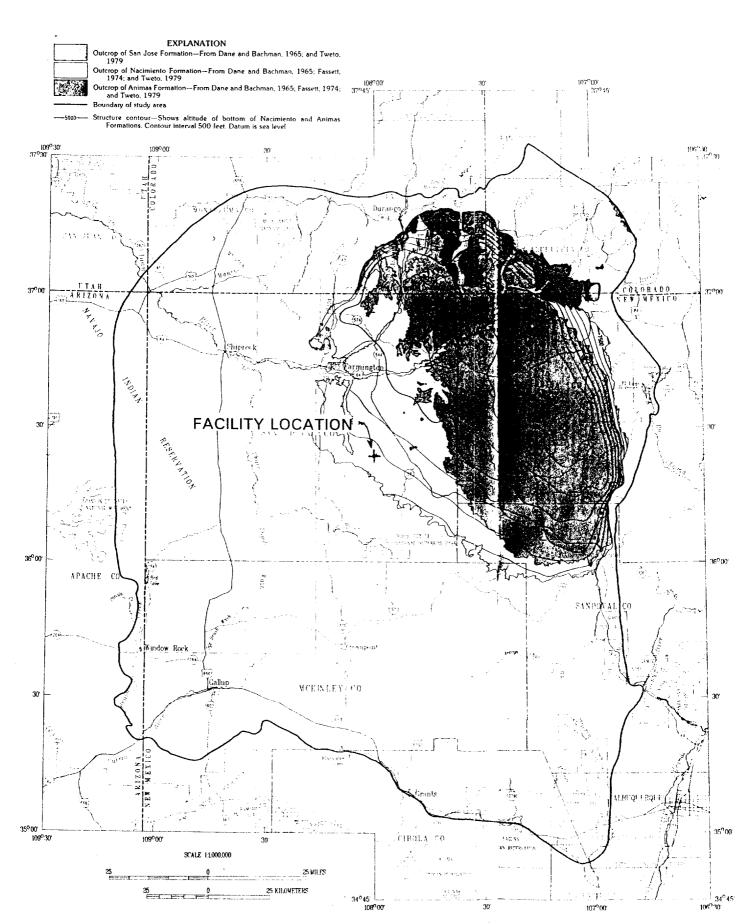
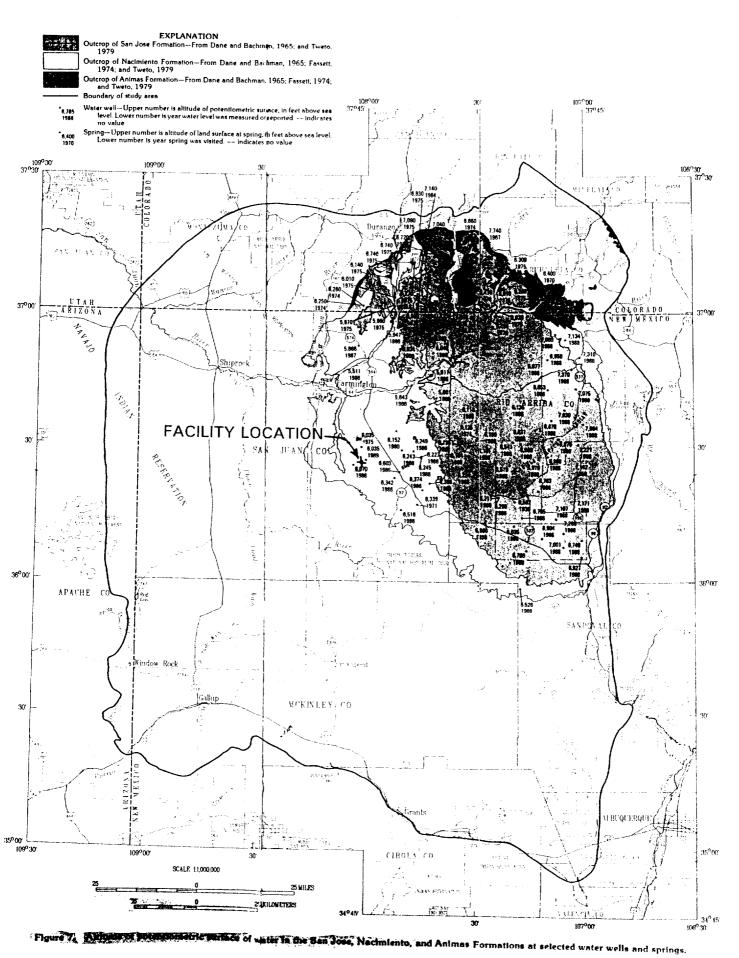


Figure 6. Approximate altitude and configuration of the bottom of the Nacimiento and Animas Formations.



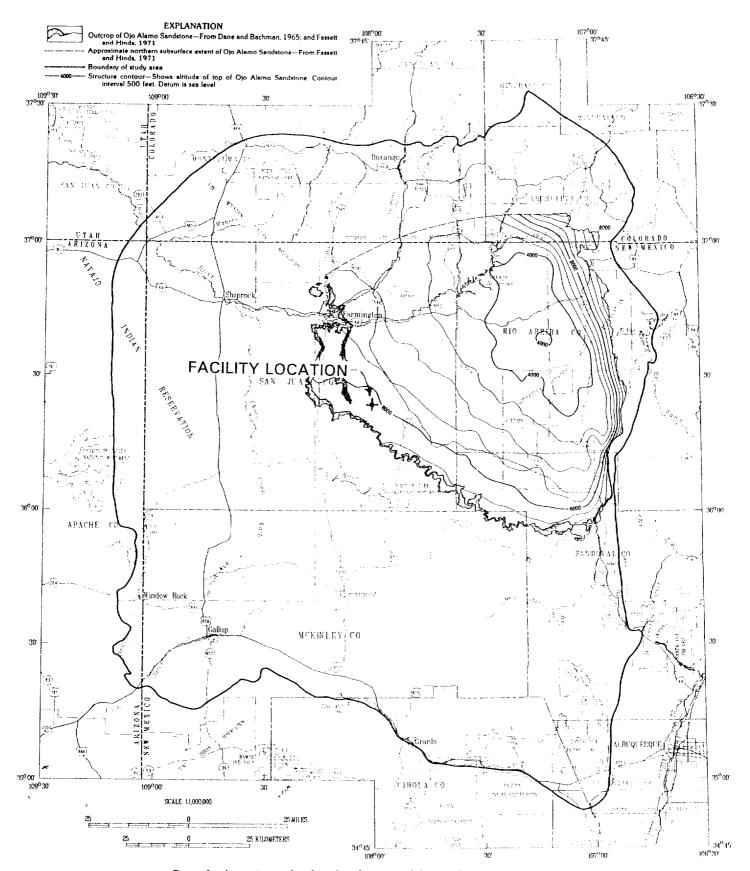


Figure 6. Approximate altitude and configuration of the top of the Ojo Alamo Sandstone.

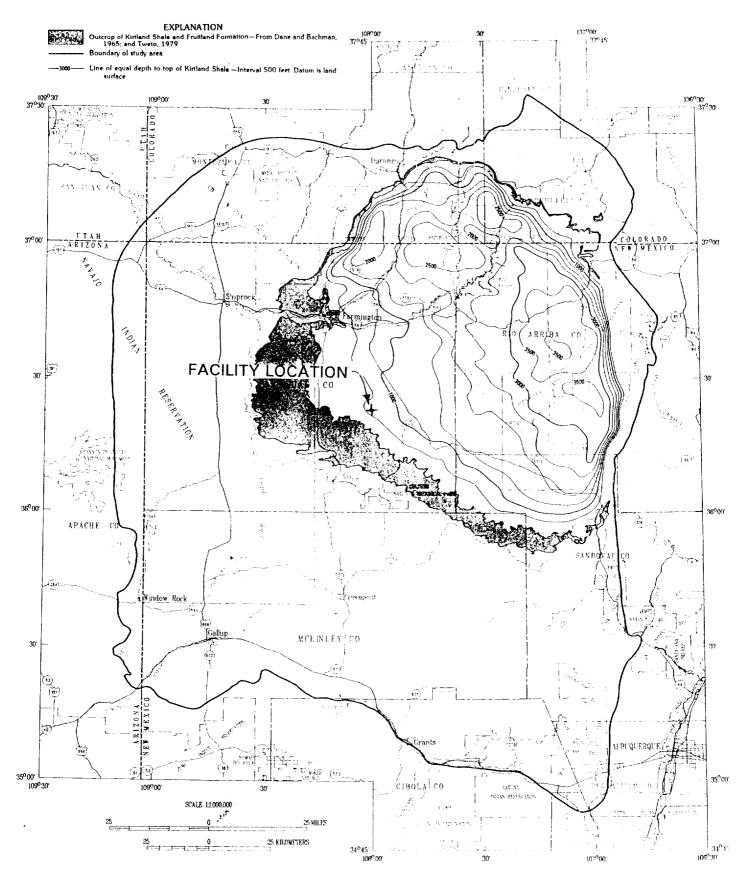


Figure 6. Approximate depth to the top of the Kirtland Shale.

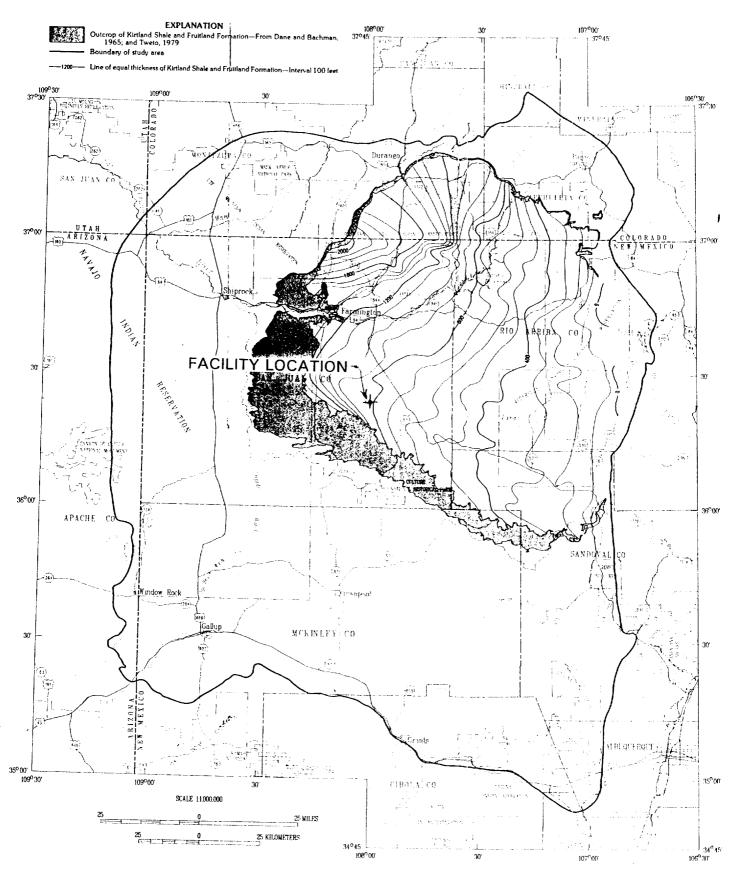


Figure 4. Approximate thickness of the Kirtland Shale and Fruitland Formation (modified from Fassett and Hinds, 1971, fig. 11).

APPENDIX B

Durango, CO 81302 CDS LABORATORIES CHAIN OF CUSTODY RECORD

Time Time Time PURCHASE ORDER # or CONTRACT # authorize the requested laboratory Services to be performed and billed to the reference contract or purchase order, or to be billed to: X. ×. × Sampling Notes Sealed Sealed 5 Date Date Date Sealed Remarks لوا Scritc (Printed) (Printed) (Printed) ANALYSES REQUESTED Dated Received by CDS Laboratories Received by: (Signature) Received by: Matrix (Signature) (Signature) Project Identification graduates Lab Number Time Time Time N ΝX X Description of Seal Sealed Sealed Pro Sealed Date Date Signed: Date Billing Address M #00:01 Kenneth F. G. A. S. Time Fax (16521 (970) 247-4220 FAX (970) 247-4227 EJERSY (NEWS MENDS) 20x 405 (Printed) (Printed) (Printed) 80518 12-5-97 Date oi Z 160 St Micheal Dev CDS LABORATORIES NM Phone (888) 988 - 417 Durango, CO 81302-2605 Sample Number Identification Fed. 26 #1 Serve Fe Report Address 75 Suttle Street P.O. Box 2605 Relinquished by: (Signature) Relinquished by: Sampled by: (Signature) (Signature) 20 Client:



75 Suttle Street Durango CO 81301

LABORATORIES

an affiliate of aqualab inc.

970-247-4220 Fax 247-4227

Attn:KENNETH GUFFEY JR

PRO ENERGY (NEW MEXICO)
460 ST MICHEAL DRIVE

SANTA FE

NM 87505

Our Lab #: B97-134173

Sample ID: GRACIA FED 26 #1

Date Login: 12/09/97 Date Rec'd: 12/09/97

COLLECTION INFORMATION

Date/Time/By: 12/05/97 1000 GUFFERY

Location:

ANALYTICAL REPORT Report Date 01/13/98

Lab# Testname Result Units

B97-134173 Oil & Grease < 2.0 mg/L

Approved By: CB-finendil Checked By:

CDS LABORATORIES Durango, CO 81302 CHAIN OF CUSTODY RECORD

Client:		Project Iden	Project Identification Gracue Federa		26-1#1	ANALYSES	YSES	Sampling Notes	otes
Pro Eneray		Description of Seal	of Seal	J		REQU	REQUESTED		
Report Address 460 St Michael Prive	ical Prive	Billing Address	ess		//				
Sut 402						<i> </i>	/		
Fe MM 8750.	5				<i>₹</i>				
Phone (888) 988 411		Fax ()			* / G /	1	\		
Sample Number Identification	Date	Time	Lab Number	er Matrix	A HAY	To July		Remarks	
Moduced water - Kirthand	11-17-97	8:00 Am	13406	8	X	X			
							-		
Kenneth F.	Guffey 2r.		18/97 2:00	The state of the s				Date	Time
, 2	M. (Printed)	נפּן	_	Received by: (Signature)			(Printed)	Sealed	N/A
<i>M</i> 7	J		Date Time	 				Date	Time
Relinquished by: (Signature)	(Printed)	S	-	Received by: (Signature)			(Printed)	Sealed	N/A
		Δ	Date Time		, TR	TRAN SALVE	ALVE	160/1	Time
Relinquished by: (Signature)	(Printed)		Sealed Y/N	Received by CD9 (Signature)	Laboratories (7)	M M	(Printed)	Sealed	
CDS LABORATORIES 75 Suttle Street	(970) 247-4220 FAX (970) 247-4227		PURCHASE OR lauthorize the reques	ASE ORDER # or CONTRACT # he requested laboratory Services to be performed and billed to:	SACT # to be performed an	d billed to the r	eference contract or	purchase order, or	to be billed to:
P.O. Box 2605 Durango, CO 81302-2605	Nº 16	16266 [—]	Signed:			PoteC	1		
						2	B		

CDS Laboratories 75 Suttle Street PO Box 2605 Durango, CO 81302

Phone: (970)-247-4220 Fax: (970)-247-4227

Report Date:

12/08/97

ANALYSIS REPORT

Attn: KENNETH GUFFEY JR

PRO ENERGY

460 ST MICHAEL DRIVE

SUITE 402

SANTA FE NM 87505

Our Lab #: B97-134063

Sample ID: GAS WELL - KIRTLAND

Date Login: 11/18/97

Date Rec'd: 11/18/97

COLLECTION INFORMATION

Date/Time/By: 11/17/97 0800 K GUFFEY

Location:

GRACIA FEDERAL 26-#1

Lab#	Testname		Result	Units
B97-134063	Total Alkalinity as CaCO3 Bicarbonate from Alkalinity Carbonate Calcium, dissolved Chloride Conductivity Iron, dissolved Hardness as CaCO3 Hydroxide Potassium, dissolved Magnesium, dissolved Sodium, dissolved pH Cation/Anion balance Specific Gravity Sulfate Total Dissolved Solids TDS calculated	<	630 769 0 109 8500 21200 0.2 397 0 166 28.1 6370 7.44 6.84 1.006 10 13800 15800	mg/L mg/L mg/L mg/L mg/L mg/L mg/L mg/L

Approved By: Cynthia Pan-Junedich Checked By: DZ