

**From:** [Ayarbe, John](#)  
**To:** [Chavez, Carl J, EMNRD](#)  
**Cc:** ["vincent@thestandardenergy.com"](mailto:vincent@thestandardenergy.com); [Bolton, Eugene, EMNRD](#)  
**Subject:** [EXT] Salty Dog Brine Well (API No. 30-025-26307)  
**Date:** Thursday, June 24, 2021 1:21:23 PM  
**Attachments:** [Salty Dog NMOCD Letter 5-20-21.pdf](#)

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Hi Carl,

As Mike and I discussed with you yesterday, Salty Dog received the attached Letter of Violation from the Hobbs OCD District Office in May 2021. It suggest that there has been a recent release at the site; however, there has not been a release. The Letter of Violation does not provide a location or source of the release or include photographs so we do not know where Mr. Bolton is referring. Vincent D'Alise talked with Mr. Bolton to try and determine the area he is referring but was unsuccessful. DBS&A and Salt Dog field staff have been to the site recently and are unaware of any releases.

As you know, Salty Dog is a brine water production and loading station located west of Hobbs. Brine is produced from the in situ extraction of salt at a brine well, a UIC Class III well (Brine Supply Well #1 [API No. 30-025-26307]). The site is under corrective action and groundwater monitoring and remediation is in progress to address former releases. Groundwater monitoring and O&M reports are submitted to you in Santa Fe semiannual.

Thanks!

**John P. Ayarbe**

Senior Hydrogeologist

**Daniel B. Stephens & Associates, Inc.**

**a Geo-Logic Company**

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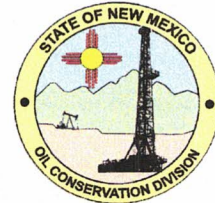
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# State Of New Mexico

## Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham  
Governor  
Sarah Cottrell Propst  
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Deputy Cabinet Secretary

Adrienne Sandoval  
Division Director



### **"Response Required - Deadline Enclosed"**

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

20-May-21

SALTY DOG INC  
P.O. Box 513  
Hobbs, NM 88240

### **LETTER OF VIOLATION - Field Inspection**

Dear Operator:

The following inspection indicates that the well, equipment, location or operational status of the well 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 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.

### ***INSPECTION DETAIL SECTION***

[30-025-26307] BRINE SUPPLY WELL #001

OGRID: 184208

J-05-19S-36E 1980 FSL 1980 FEL

Inspection Date	Type Inspection	Inspector	Corrective Action Due By	Inspection No.
5/5/2021	Routine Inspection	[EZB] Eugene Bolton	8/20/2021	iEZB2112553051

#### **Violations:**

##### **Rule**

19.15.16.18 Well and Lease Equipment

##### **Violation**

Substandard  
Equipment  
and/or Needs  
Repair

##### **Comment:**

Repair all sources of brine release.

19.15.16.8 Sign on Wells

Absent Well  
Identification  
Sign

##### **Comment:**

Sign to include well ID & info, operator ID, & API # 30-025-26307.

19.15.10.8 Safety Procedures for Drilling and Production

Unauthorized  
Release

##### **Comment:**

Do not cover contamination. Refer to 19.15.29 NMAC for prod water thresholds, remediation requirements, and completion of Form C-141. 5 bbls of fluid compares to 12 cubic yards, or a dump truck load of soil. Obtain approved site characterization of area with soil sampling concentration/s and contamination depth/s. Report findings within 30 days, subject to verification of determination/s.

19.15.29 Releases

Threat of  
USDW  
Contamination

5/20/2021

**Comment:**

For detectable chlorides below 10,000 mg/L and exposed to livestock, remove 3 inch depth and replace with caliche if on pad, good soil if off. Please submit plan for immediate cleanup and remediation. Guidance: excavate all contamination up to two foot depth below surface. If contamination remains, stop work and contact inspector within 48 hours for further directions before commencing remediation. If all contamination is removed, please submit photos of 3 angles of terminal excavation, including a glove, shovel, etc. in images for perspective.

19.15.16 Drilling and Production

Noncompliance  
with Permitting  
or Registration

**Comment:**

Update all contact information, including current phone numbers, email addresses, mailing addresses, and for each district of operation/production.

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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 Division Examiner in Santa Fe to show cause why you should not be ordered to permanently plug and abandon this well.

Sincerely,



Eugene Bolton, Compliance Ofc.  
Hobbs OCD District Office

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

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Oil Conservation Division \* 1625 N. French Drive \* Hobbs, NM 88240  
Phone: 575-393-6161 \* Fax: 575-393-0720 \* [www.emnrd.state.nm.us](http://www.emnrd.state.nm.us)

Gene Bolton

575.840.5961

# Well Inspection Details

[Home](#) / [Inspections](#) / Details

## Inspection Details

Click on the ellipsis [...] next to the information you want to edit.

Well Name	[30-025-26307] BRINE SUPPLY WELL #001	More Well Info
Inspection Key	iEZB2112553051	
Inspector	[EZB] Eugene Bolton	
Inspection Purpose	Routine/Periodic	
Inspection Type	Routine Inspection	
Do Violations Exist	Yes	
Inspected On	5/5/2021 2:44:10 PM	...
Inspection Note	diminished vegetation. No sign. A regular well appears to be connected into this system.	...

Create Compliance

## Inspection Violations



Rule	Violation	Comment	
19.15.16.18 Well and Lease Equipment	Substandard Equipment and/or Needs Repair	Repair all sources of brine release.	X
19.15.16.8 Sign on Wells	Absent Well Identification Sign	Sign to include well ID & info, operator ID, & API # 30-025-26307.	X

19.15.10.8 Safety Procedures for Drilling and Production	Unauthorized Release	Do not cover contamination. Refer to 19.15.29 NMAC for prod water thresholds, remediation requirements, and completion of Form C-141. 5 bbls of fluid compares to 12 cubic yards, or a dump truck load of soil. Obtain approved site characterization of area with soil sampling concentration/s and contamination depth/s. Report findings within 30 days, subject to verification of determination/s.	X
19.15.29 Releases	Threat of USDW Contamination	For detectable chlorides below 10,000 mg/L and exposed to livestock, remove 3 inch depth and replace with caliche if on pad, good soil if off Please submit plan for immediate cleanup and remediation. Guidance: excavate all contamination up to two foot depth below surface. If contamination remains, stop work and contact inspector within 48 hours for further directions before commencing remediation. If all contamination is removed, please submit photos of 3 angles of terminal excavation, including a glove, shovel, etc. in images for perspective.	X
19.15.16 Drilling and Production	Noncompliance with Permitting or Registration	Update all contact information, including current phone numbers, email addresses, mailing addresses, and for each district of operation/production.	X

Inspection Photos



File	Name	Comment
	iEZB2112553051_1.png - 5/5/2021 3:06:22 PM	X
	iEZB2112553051_10.png - 5/5/2021 3:06:22 PM	X





iEZB2112553051\_11.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_12.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_2.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_3.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_4.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_5.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_6.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_7.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_8.png - 5/5/2021 3:06:22 PM

X



iEZB2112553051\_9.png - 5/5/2021 3:06:22 PM

X

All MITs

Inspection Key	Reason	Type	Date	Result	Comment
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<a href="#">iGR1804026307</a>	5-year Test	Std. Annulus Pres. Test	2/9/2018	Acceptable	MIT Pressure RPD ~ 0.65%, which is a "Pass." Cavern MIT (~ 4 hrs.)
<a href="#">iMAW1632026307</a>	5-year Test	Std. Annulus Pres. Test	11/15/2016	Acceptable	Cavern MIT: Pressure test conducted for integrity of casing and cavern. Meter calibrated 10/25/2016. Start test at 8:39 am. Pulled chart at 12:43 pm. Left chart with Jim w/ Standard Services. (Pass: +/- 1 %) Ok.
<a href="#">iJEG1322026307</a>	Post Workover Test	Std. Annulus Pres. Test	8/8/2013	Acceptable	Remedial work was performed on the well.
<a href="#">iMAW1032026307</a>	Special Test Requested	Std. Annulus Pres. Test	11/16/2010	Acceptable	Test Successful. Very slight (<10%) bleed-off. Chart w/ Jon Ammons.
<a href="#">iCJC0922626307</a>	Annual IMIT	Std. Annulus Pres. Test	8/14/2009	Acceptable	On site on 8/13/09, but well was not pressured up w/ brine greater than 300 psig due to faulty gauge. Operator recharged well overnight & ran Fm. MIT (4-hr) next day.
<a href="#">iCJC0811326307</a>	5-year Test	Std. Annulus Pres. Test	4/22/2008	Acceptable	EPA 5-Yr. Pulled tubing, set packer @ 1840 - 1843 ft. above casing shoe. Ok.
<a href="#">iPRS0536326307</a>	Annual IMIT	Std. Annulus Pres. Test	12/29/2005	Acceptable	ANNUAL BRINE WELL TEST START 340# @ 9:00 AM 12/29/05 END 1:30 PM 12/29/05;
<a href="#">iELG0428826307</a>	Annual IMIT	Std. Annulus Pres. Test	10/14/2004	Acceptable	BRINE WELL TEST-- G. WINK STARTED TEST @ 10:45AM-- ELG PULLED TEST CHART @ 3:05PM -- 10/13/04
<a href="#">iELG0428826307</a>	Special Test Requested	Std. Annulus Pres. Test	10/14/2004	Acceptable	BRINE WELL TEST OKAY; WITNESSED BY EL GONZALES OKAY'D BY WAYNE PRICE AND GARY WINK;

<a href="#">iLWH0228926307</a>	Special Test Requested	Std. Annulus Pres. Test	10/16/2002	Acceptable	Test Successful. No pressure bleed-off.BRINE WELL. PKR. SET @ 1821'.
<a href="#">iMAW0033726307</a>	Other	Std. Annulus Pres. Test	12/2/2000	Acceptable	BW-008 Cavern MIT +/- 1% to PASS. Ok. CJC
<a href="#">iLWP0033126307</a>	Other	Std. Annulus Pres. Test	11/26/2000	Acceptable	BW-008

All Compliances

Compliance Key	InspectionKey	Reference Id	Operator	Violation Date	Required By	Acheived On	status
<a href="#">cEZB21140</a>	iEZB2112553051 (current record)	30-025-26307	[184208] SALTY DOG INC	5/5/2021	08/20/202	12/31/999	Open
<a href="#">cMGB0634</a>		30-025-26307	[184208] SALTY DOG INC	12/11/200	03/16/200	04/22/200	Closed
<a href="#">cPRS06129</a>		30-025-26307	[184208] SALTY DOG INC	5/9/2006	08/12/200	12/31/999	Open
<a href="#">cPRS06011</a>		30-025-26307	[184208] SALTY DOG INC	12/29/200	04/03/200	12/31/999	Open
<a href="#">cLWH0228</a>		30-025-26307	[184208] SALTY DOG INC	10/16/200	01/19/200	10/14/200	Closed

All Inspections

Inspection Key	Inspector	Purpose	Type	Violations Found	Inspection Date	Notes
iEZB2112553051 (current record)	[EZB] Eugene Bolton	Routine/Pressure	Routine Inspection	Yes	5/5/2021	Equip and location bad condition. Brine well--no prod, standing water under south two rental tanks, open drip pan, cut line to tank, chlorides around well house, tanks, and in flow path from rental tanks to north across road and field of diminished vegetation. No sign. A regular well appears to be connected into this system.
<a href="#">iGR1804049629</a>	[GR] Gary Robinson	Well Testing	Initial Inspection	No	2/9/2018	CAVITY MIT WAS OK, CAL DATE 1-31-2018, SER # 15698, LEFT CHART W/ JIM W/ STANDARD, START @ 7:50 AM, ENDED @ 12:01 PM. RECORDER SET TO 12 HOUR.
<a href="#">iGR1804026307</a>	[GR] Gary Robinson	Well Testing	Routine Inspection	No	2/9/2018	Inspection parent record created during conversion!
<a href="#">iGR1803940755</a>	[GR] Gary Robinson	Well Testing	Initial Inspection	No	2/8/2018	CLOCK STOPED DURING CAVITY MIT TEST, RE-SCHEDULED FOR 2-9-2018, CHART WAS LOOSE ON RECORDER HUB.



<a href="#">iMAW1632026307</a>	[MAW] Mark Whitaker	Well Testing	Routine Inspection	No	11/15/201	Inspection parent record created during conversion!
<a href="#">iMAW1632122520</a>	[MAW] Mark Whitaker	Well Testing	Initial Inspection	No	11/15/201	Scheduled cavity/MI 4 hour testing.
<a href="#">iMGB1631937634</a>	[MGB] Maxey Brown	Routine/Pe	Initial Inspection	No	11/14/201	SCHEDULED TO DO TEST AT 9:00AM TILL 1:00PM ON 11/15/2016.
<a href="#">iMAW1407752191</a>	[MAW] Mark Whitaker	Routine/Pe	Initial Inspection	No	3/18/2014	Operator has rigged up on well.
<a href="#">iSAD1324149947</a>	[SAD] Sylvia Dickey	Routine/Pe	Initial Inspection	No	8/29/2013	NOI C103 APRVD 7/24/2013; MIRU PULLING UNIT GIH W/ 4 y4" BIT AND DIRECTIONAL TOOLS ATTEMPT TO SIDETRACK FISH IN WELL AND GO TO 2900'. SET 2 7/8" TUBING STRING @ 2900' RETURN WELL BACK TO PRODUCTION - RDMO
<a href="#">iMGB1324221821</a>	[MGB] Maxey Brown	Field Notes	Initial Inspection	No	8/29/2013	RANDY 806-787-1864 CALLED WITH NOI TO MIRU TO WORK ON WELL, 8-30-2013.
<a href="#">iJEG1322026307</a>	[JEG] Jim Griswold	Well Testing	Routine Inspection	No	8/8/2013	Inspection parent record created during conversion!
<a href="#">iMAW1032026307</a>	[MAW] Mark Whitaker	Well Testing	Routine Inspection	No	11/16/201	Inspection parent record created during conversion!
<a href="#">iMAW1032047760</a>	[MAW] Mark Whitaker	Well Testing	Initial Inspection	No	11/16/201	Conduct MIT on csg. Test good. Chart w/ Jon Ammons, Standard Services.
<a href="#">iSAD1026538942</a>	[SAD] Sylvia Dickey	Complianc Related	Initial Inspection	No	9/22/2010	JON AMMONS MGR W/ STANDARD ENERGY SERVICES 575-390-3414, WANTED TO MIRU ON THIS WELL 9/23/2010; THIS IS BRINE WELL/SANTA FE JURISDICTION; I NOTIFIED, LEFT MESSAGE TO JIM GRISWOLD THAT OPERTOR SUSPECTS PARTED TUBING. TOLD OPERATOR TO WAIT AND SPEAK TO JIM/SANTA FE FOR FURTHER OKAY. PRESENTLY HAS PERMIT FOR SURFACE STRUCTURE CHANGE THAT HAS NOT BEEN APPROVED.
<a href="#">iCJC0922626307</a>	[CJC] Carl Chavez	Well Testing	Routine Inspection	No	8/14/2009	Inspection parent record created during conversion!
<a href="#">iCJC0811326307</a>	[CJC] Carl Chavez	Well Testing	Routine Inspection	No	4/22/2008	Inspection parent record created during conversion!

<a href="#">iMGB0634621899</a>	[MGB] Maxey Brown	Incident Inspection	Status Check/Follow-up	Yes	12/11/200	Location needs attention. Equipment OK. PIT OVERFLOWED SPILLING BRINE WATER ONTO LOCATION. REPORT NEEDS TO BE SUBMITTED TO OCD OFFICE. (RULE 116). ALSO A CLEANUP PLAN FILED W/ MR. LARRY JOHNSON-OCD (393-6161 EXT 111) FOR APPROVAL BEFORE WORK BEGINS. THIS IS 1ST LETTER OF NON-COMPLIANCE.
<a href="#">iPRS0612951264</a>	[PRS] Paul Sheeley	Compliance Related	Status Check/Follow-up	Yes	5/9/2006	OCD personnel inspected a major release at the Salty Dog. A rule 116 violation. No immediate notice given. A C-141 and corrective action plan must be submitted by June 1, 2006.
<a href="#">iSAD0600339227</a>	Unknown Inspector	Well Testing	Initial Inspection	No	12/29/200	MIT BRINE WELL TEST WITNESSED BY PAUL SHEELEY; 12/29/2005;
<a href="#">iPRS0536326307</a>	[PRS] Paul Sheeley	Well Testing	Routine Inspection	No	12/29/200	Inspection parent record created during conversion!
<a href="#">iELG0428837032</a>	[ELG] Elidio Gonzales	Well Testing	Initial Inspection	No	10/14/200	OK. All Equipment and Location in Good Shape. BRINE WELL PRESSURE TEST COMPLETE.
<a href="#">iELG0428826307</a>	[ELG] Elidio Gonzales	Well Testing	Routine Inspection	No	10/14/200	Inspection parent record created during conversion!
<a href="#">iLWH0228926307</a>	[LWH] Buddy Hill	Well Testing	Routine Inspection	No	10/16/200	Inspection parent record created during conversion!
<a href="#">iLWH0228932200</a>	[LWH] Buddy Hill	Well Testing	Complaintant Response	No	10/16/200	No Well Sign. P/T CSG., OK !
<a href="#">iLWH0228857998</a>	[LWH] Buddy Hill	Well Testing	Complaintant Response	No	10/15/200	ATTEMPTED P/T ON CSG.,DID NOT PASS..WILL RETEST 10-16-02 AM.
<a href="#">iJDR0228836918</a>	[JDR] John Robinson	Routine/Pe	Initial Inspection	No	10/15/200	Walter with ZIA Transports has rigged up on well and is trying to pull the stuck tubing.
<a href="#">iJDR0228233498</a>	[JDR] John Robinson	Routine/Pe	Initial Inspection	No	10/9/2002	Checked status of repair on brine well for Gary Wink. Operator hasn't rigged up yet. No pulling unit on location.
<a href="#">iMAW0033726307</a>	[MAW] Mark Whitaker	Well Testing	Routine Inspection	No	12/2/2000	Inspection parent record created during conversion!
<a href="#">iLWP0033126307</a>	[LWP] Lester Price	Well Testing	Routine Inspection	No	11/26/200	Inspection parent record created during conversion!

Inspection Audit Log

Occurred On	Who	What	Notes
5/20/2021 1:59:38 PM	EBolton	Added Violation	Noncompliance with Permitting or Registration. Violation of Rule:19.15.16 Drilling and Production
5/5/2021 3:50:20 PM	ebolton	System Synced Inspection File	iEZB2112553051_12.png 5/5/2021 3:06:22 PM

5/5/2021 3:50:20 PM	ebolton	System Synced Inspection File	iEZB2112553051_11.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:20 PM	ebolton	System Synced Inspection File	iEZB2112553051_10.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:20 PM	ebolton	System Synced Inspection File	iEZB2112553051_9.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:20 PM	ebolton	System Synced Inspection File	iEZB2112553051_8.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_7.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_6.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_5.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_4.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_3.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_2.png	5/5/2021 3:06:22 PM
5/5/2021 3:50:19 PM	ebolton	System Synced Inspection File	iEZB2112553051_1.png	5/5/2021 3:06:22 PM
5/5/2021 2:44:00 PM	ebolton	Created inspection record	Generated from the Mobile App	

**District I**

1625 N. French Dr., Hobbs, NM 88240  
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**District II**

811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**

1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

COMMENTS

Action 33776

**COMMENTS**

Operator: SALTY DOG INC P.O. Box 513 Hobbs, NM 88240	OGRID: 184208
	Action Number: 33776
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

**COMMENTS**

Created By	Comment	Comment Date
cchavez	BW-8 Brine Facility Inspection 5-20-2021 Inspector Gene Bolton Hobbs District Office	6/25/2021

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
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**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 33776

CONDITIONS

Operator: SALTY DOG INC P.O. Box 513 Hobbs, NM 88240	OGRID: 184208
	Action Number: 33776
	Action Type: [UF-DP] Brine Facility Discharge Plan (DISCHARGE PLAN BRINE EXTRACTION)

CONDITIONS

Created By	Condition	Condition Date
cchavez	None	6/25/2021