

GW - __114__

APPROVALS

YEAR(S)

2008 - 2010

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, January 21, 2010 5:52 PM
To: 'Du'Bois Ferguson'
Cc: Bratcher, Mike, EMNRD; JMBarber@dow.com; 'Rick Deuell'
Subject: Discharge Permit (GW-114) Additional Monitoring Well Required

**RE: "2009 Annual Report"
for the Schlumberger Oilfield Services'
Schlumberger Oilfield Services Facility - Artesia
507 E. Richey Ave., Artesia, New Mexico
Discharge Permit (GW-114) Additional Monitoring Well Required**

Dear Mr. Ferguson:

The New Mexico Oil Conservation Division (OCD) has received the 2009 Annual Report for the Schlumberger Oilfield Services Facility - Artesia, dated January 4, 2010, and has conducted a review of the report. The report, submitted for the above-referenced site, indicates that the Schlumberger Oilfield Services (Schlumberger) is substantially complying with the requirements of 20.6.2 NMAC [Water Quality Control Commission (WQCC) Regulations]. Therefore, the OCD conditionally concurs with the recommendations as specified in the report. The OCD requires the following:

Schlumberger shall install an additional ground water monitoring well downgradient of MW-30 to delineate a possible release to ground water beyond the site boundary. The well location shall be approved by the OCD prior to installation. [An additional monitoring well(s) may be required if any WQCC standard is exceeded.] The ground water from the "new" monitoring well must be analyzed quarterly for the same parameters as that of MW-30.

Please be advised that OCD concurrence with this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Thursday, September 11, 2008 2:38 PM
To: 'DFerguson3@slb.com'
Cc: 'Rick Deuell'
Subject: RE: Schlumberger Artesia (GW-114)

Dear Mr. Ferguson:

The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted revised schedule for completion of the containment work – Schlumberger Technology Corporation – Artesia, New Mexico, dated September 11, 2008, for the above referenced site. The NMOCD hereby conditionally approves the Revised Schedule:

1) Schlumberger must notify the NMOCD within 5 days of a revised completion date(s) if any of the completion dates are not met.

Also, please be advised that NMOCD approval of this schedule does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please use the NMOCD case # (GW-114) on future correspondence regarding the site listed above.

From: Rick Deuell [mailto:rdeuell@qwest.net]
Sent: Thursday, September 11, 2008 11:53 AM
To: Hansen, Edward J., EMNRD
Subject: Schlumberger Artesia (GW-114)

Edward,
Attached is a revised schedule for the Artesia project.

Rick

This inbound email has been scanned by the MessageLabs Email Security System.

9/11/2008

Hansen, Edward J., EMNRD

From: Rick Deuell [rdeuell@qwest.net]
Sent: Thursday, September 11, 2008 11:53 AM
To: Hansen, Edward J., EMNRD
Subject: Schlumberger Artesia (GW-114)
Attachments: Work Plan Scedule Rev 2008 ANM.doc

Edward,
Attached is a revised schedule for the Aretsia project.

Rick

This inbound email has been scanned by the MessageLabs Email Security System.

Deuell Environmental, LLC

September 11, 2008

Mr. Edward Hansen
Environmental Bureau
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Ground Water Containment Work Plan
Schlumberger Technology Corporation Facility – Artesia, New Mexico (GW-114)

Dear Mr. Hansen:

Following is a Revised schedule for the above referenced Work Plan.

TASK	START DATE	COMPLETION DATE
POTW Permit	April 28	Rejected
NMSEO Permit	Submitted	September 19
Surveying		Complete
Electrical Drop	Requested	October 10
Well Installation	September 22	September 26
Reinjection Trench	September 22	October 3
Discharge Line	September 29	October 10
Pumping Facility	September 29	October 10
Startup and Testing	October 13	October 17

If you have any questions or comments, please call me at 307-760-3277 or Joe Ferguson at 281-285-3692.

Sincerely,

Rick Deuell, P.E.
Project Manager

Enclosures

cc: Du'Bois Ferguson, Schlumberger Technology Corporation
Carey Brannan, Dow

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, September 08, 2008 1:21 PM
To: 'DFerguson3@slb.com'
Cc: 'Rick Deuell'
Subject: Revised Work Plan Approval for Schlumberger - Artesia GW Remediation under GW-114

Dear Mr. Ferguson:

The New Mexico Oil Conservation Division (NMOCD) has reviewed the submitted Revised Work Plan for Ground Water Containment – Schlumberger Technology Corporation – Artesia, New Mexico, dated July 30, 2008, for the above referenced site. The NMOCD hereby conditionally approves the Revised Work Plan:

- 1) Schlumberger must submit to the NMOCD a revised schedule for completion of the containment work (see email to the NMOCD of July 17, 2008) within 10 days.
- 2) Schlumberger must report to the NMOCD any exceedance of the Water Quality Control Commission Standards (see 20.6.2.3103 NMAC) for any groundwater constituent sampled in MW-26 through MW-30 within 10 days of finding.

Also, please be advised that NMOCD approval of this plan does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

P.S.: Please use the NMOCD case # (GW-114) on future correspondence regarding the site listed above.

Hansen, Edward J., EMNRD

From: Rick Deuell [rdeuell@qwest.net]
Sent: Friday, July 18, 2008 11:16 AM
To: Hansen, Edward J., EMNRD
Subject: Schlumberger - Artesia (GW-114)

Edward,

As we discussed on the phone, we have made considerable progress and the containment, unfortunately it has not all been in a forward direction. Following are some of the items of note:

- Two contacts have been made with the Director of utilities for Artesia. I discussed it over the telephone and then went directly to his office. He has rejected our plan to send water to the waste water treatment plant. He believes that the plant is very near hydraulic capacity due to growth in Artesia from FLETC and the oilfield boom. He was going to get me an official denial letter from the City that I have yet to receive.
- The State Engineer's Office told me that the Pecos River drainage is completely allocated. If we were to send water to the waste water plant the City of Artesia would have to give up an equal amount of water right. I have not explained this to the City, but it gives them more reason not to accept our water. If we re-inject the water no water right is needed and we should get approval within a week.
- We have made plans to utilize a reinjection trench up-gradient to dispose of the water. A contractor and source of stone has been located. We will submit a plan to you showing the details. It is assumed that treatment will be provided by aeration, carbon filters, or a combination of both.
- The driller we had scheduled to do the work has backed out on us. A new driller from Roswell has been located.
- We had to hire a local electrician in order to get an engineer from the power company to even look at our proposed electrical drop. The power company wants a guaranty that no easements are needed before he will schedule the work. We had already hired a surveyor to do a site map so we had him look at marking the boundaries. The surveyor could not locate the property corners so we are in the process researching the county subdivision records and property deeds. Once the survey is complete the power company needs a minimum of eight weeks.

Needless to say, our schedule has changed. Following are some updated goals:

- | | |
|--|--------------|
| -Survey work complete | July 25 |
| -Submit permit to SEO | July 25 |
| -Submit reinjection plan | August 1 |
| -SEO Permit | August 8 |
| -Approval of reinjection plan | August 15 |
| -Well drilling complete | August 15 |
| -Reinjection trench complete | August 29 |
| -Treatment system complete | September 12 |
| -Electrical drop from the power company complete | September 19 |
| -Startup and testing | September 26 |

Please give me call if there are any questions.

Rick Deuell

This inbound email has been scanned by the MessageLabs Email Security System.
