

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Betty Rivera Cabinet Secretary Lori Wrotenbery Director Oil Conservation Division

March 21, 2002

<u>CERTIFIED MAIL</u> RETURN RECEIPT NO: 7001-1940-0004-3929-7228

Mr. Robert C. Lang IV Chaparral Energy, Inc. 701 Cedar Lake Blvd. Oklahoma City, Oklahoma 73114-7806

RE: STAGE 1 ABATEMENT PLAN PROPOSAL (AP-18) SOUTH LANGLIE JAL UNIT JAL, NEW MEXICO

Dear Mr. Lang:

The New Mexico Oil Conservation Division (OCD) has reviewed Chaparral Energy, Inc.'s (Chaparral) February 28, 2002 correspondence titled "STAGE 1 ABATEMENT PLAN, FOR THE SOUTH LANGLIE JAL UNIT CONSISTING OF PORTIONS OF SECTIONS 7, 8, 17 & 18, TOWNSHIP 25 SOUTH – RANGE 37 EAST, LEA COUNTY, NEW MEXICO" and accompanying February 2, 2002 "STAGE 1 ABATEMENT PLAN FOR THE SOUTH LANGLIE JAL UNIT CONSISTING OF PORTIONS OF SECTIONS 7, 8, 17 & 18, TOWNSHIP 25 SOUTH – RANGE 37 EAST, LEA COUNTY, NEW MEXICO". These documents contain Chaparral's amended proposed Stage 1 abatement plan for investigation of the extent of contamination related to Chaparral's South Langlie Jal Unit located in portions of Sections 7, 8, 17 and 18 of Township 25 South, Range 37 East, Lea County, New Mexico. These amended documents replace Chaparral's prior Stage 1 Abatement Plan Proposal for the South Langlie Jal Unit.

Upon a review of the above-referenced document, the OCD has a few comments and has identified some deficiencies in the Stage 1 Abatement Plan Proposal as set out below:

- 1. The "Well Spot Map" in appendix A.7 does not contain an index or any information on what facilities are shown on the map. Please provide a revised map which designates the name and type of each facility, well and pit represented within the unit.
- 2. The "Pipeline Map" in appendix A.8 does not contain an index or any information on what facilities are shown on the map. Please provide a revised map which designates the name and type of each pipeline, flowline and injection line represented within the unit.

- OCD Exhibit No. <u>7</u> Case No. 13061 July 15, 2003. Sept 2, 2004

- The "Map Showing Documented Release Sites" in appendix A.9 does not contain an index or any information on what sites are represented on the map. In addition, it does not appear that the 2 Winters Tank Battery sites and Gutman Lease Tank Battery Flare Pit site are shown on the map. These are also known release sites. Please provide a revised map which designates the name and type of each spill or release site represented within the unit including the above tank battery and flare pit sites.
- The table of documented release sites in Appendix F does not include the Winters Tank Battery sites and Gutman Lease Tank Battery Flare Pit sites. Please provide a revised table which includes these sites.
- 5. It is not clear whether the CERI sampling site and SESI Site #9, as shown in Appendix A 10, are sites listed in the table of documented release sites in Appendix F. Please clarify this information.
- 6. Section 2.4.5 on page 8 states that "there is indications surface and ground water flow is to the north, towards the Osborn home". Please provide this information.
 - Page 2 of Chaparral's February 28, 2002 correspondence states that Chaparral has completed mechanical integrity testing (MIT) of the injection wells within the unit and that 2 wells have been scheduled for plugging and abandonment. Please provide information on the names and locations of all wells with completed MIT's. In addition, please indicate which wells have been scheduled for plugging and abandonment and the reasons for the plugging on these 2 wells.

Please submit the above information by <u>April 12, 2002</u>. Submission of this information will allow the OCD to complete a review of Chaparral's Stage 1 Abatement Plan Proposal.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

cc:

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William C. Olson Hydrologist Environmental Bureau

> Chris Williams, OCD Hobbs District Office Mary C. Claiborne, Mayor, City of Jal Clay Osborn Carroll H. Leavell Darrell E. Bailey Darrold E. Stephenson & JoAn R. Stephenson