

BEFORE THE NEW MEXICO OIL CONSERVATION COMMISSION

SANTA FE, NEW MEXICO

Application of Atlantic Richfield Company on its own behalf and as operator of the Denton salt water disposal system for an exception to Paragraph (6) of Order R-3221 of the Oil Conservation Commission to allow the use of unlined pits for temporary emergency storage of produced water in connection with separate tank batteries connected to the Denton salt water disposal system located in the Denton Pool Lea County, New Mexico.

Case 3693

Oil Conservation Commission
Box 2088
Santa Fe, New Mexico

Comes Atlantic Richfield Company with offices at Roswell, New Mexico and on its own behalf and as operator of the Denton Pool salt water disposal system and hereby makes application for an exception to Paragraph (6) of Order R-3221 entered in Case No. 3551 on May 1, 1967 so as to allow the use of unlined pits for temporary emergency storage of produced water in connection with separate tank batteries connected to the Denton Pool salt water disposal system and in support thereof respectfully shows:

1. That applicant is the owner of certain leasehold interests producing from the Denton Pool in Lea County, New Mexico and is one of the co-owners and operator of the Denton Pool salt water disposal system which has been in operation for several years for the purpose of disposing of produced water from the Denton Pool. That the disposal system is essentially a gravity system and unlined pits have been maintained in connection with each tank battery connected to the salt water disposal system so that in case of any line breakage or in case of any emergency salt water which would otherwise be disposed

of by said system can be temporarily stored in such pits. Whenever such pits have been used for temporary emergency storage of produced water in the past they have been drained and the water put into the disposal system not less than 72 hours later so that in effect said pits have not been used in any instance since said disposal system has been in operation for the disposal of produced water.

2. It would be practically impossible to operate the present salt water disposal system without some provision for the temporary storage of produced water in case of line breakage or other emergency beyond the control of the operator and the rebuilding of the system to prevent the use of pits for the temporary emergency storage of produced water would entail an expenditure of several hundred thousand dollars.

3. Applicant respectfully requests that an order be entered providing for the following exception to Paragraph (6) of Order R-3221 of the Commission:

"That as an exception to Paragraph (6) of Order R-3221 it is permissible to allow the use of unlined pits for temporary emergency storage of produced water in connection with separate tank batteries connected to the Denton Pool salt water disposal system located in the Denton Pool in Lea County, New Mexico; however, said water shall not remain in such pits for more than 72 hours at any one time."

Respectfully submitted,

ATLANTIC RICHFIELD COMPANY

By *J. P. Tankersley*

HINKLE, BONDURANT & CHRISTY

By *[Signature]*

Attorneys for Applicant

Box 10

Roswell, New Mexico