

## GENERAL CORRESPONDENCE

# YEAR(S): 1998

#### Inspection Report Loco Hills Water Disposal Facility (Waypoint #19) Eddy County, NM

Inspection Date:	Nover	November 2, 1998			
EPA ID Number:	none	none			
Facility Name:	Loco I	Loco Hills Water Disposal Facility			
Physical Location:	N 32° 1 mile Sectio	49.868', W 103° 59.116' North on Eddy County Road n 16, Township 17S, Range 30E			
Mailing Address:	P.O. E Loco	30x 68 Hills, NM 88255			
Type of Ownership	: privat	e			
Inspection Participa Lead EPA I	ants: nspecto	r: Melissa Smith (214) 665-7357 Initials: MLS			
Other Partic Roger Ander Doug McKer Vince Balder Ed Moriarty Tim Reeves	c <b>ipants:</b> son ina raz	New Mexico Oil Conservation Division U.S. Fish and Wildlife Service U.S. Bureau of Land Management Science Applications International Corporation (SAIC) SAIC	(505) 827-7152 (505) 589-2823 (505) 393-3612 (703) 645-6973 (303) 382-6730		
Facility Owner:	Loco	Hills Water Disposal Corporation			
Facility Representa	tive:	James R. Maloney, Vice President, (505) 677-2118			
Facility Description	n: Comr	nercial facility for produced water disposal.			
Generator Status:	non-g	enerator			
Inspection Type:	Comp	bliance evaluation inspection with sampling			
<b>Reason for Evaluat</b>	tion: General inspection with sampling				
Summary of Inspec	ary of Inspection: see narrative				
Checklists Completed: Problem Oil Pit Inspection Checklist					

Peer Reviewed by: Estaban Herren

Date: 05/04/99

#### Compliance Evaluation Inspection Narrative Loco Hills Water Disposal Facility (Waypoint #19) Eddy County, NM

On September 17, 1998, the Loco Hills Water Disposal Facility was identified during an aerial survey by the U.S. Fish and Wildlife Service (FWS) as being a potential problem oil pit facility. From the air, it appeared that the facility had some pits with oil on the surface that were not netted as well as an oily discharge running off to the south side of the property (see Photo Log "A", photo #'s 1-3). A site inspection was conducted on November 2, 1998, as a follow-up to the aerial survey. The inspection team arrived at the facility at approximately 11:30am. The team was met by Mr. James R. (Dick) Maloney, Vice President of the facility. The team explained the purpose of the visit which was to follow-up on the information obtained during the aerial survey, determine if any pits or structures pose a threat to wildlife (including any mortality observed onsite), and to determine if the facility handles any waste which may be subject to the Resource Conservation Recovery Act regulations regarding hazardous waste.

The facility leases 40 acres of property off of Eddy County Road approximately one mile north of Highway 82. Twenty acres are fenced off and contain the facility's operations. Produced waters are taken in from trucking companies that have designated contracts with the Loco Hills facility ("Facility"). The Facility only accepts exempt oil field waste (waste that is exempt from the RCRA hazardous waste regulations). The off loading area is equipped with a computer lock-out system which prevents unauthorized transporters from disposing of waste at the Facility (see Photo Log "C", photo #'s 2 & 4). The computer system tracks the transporter, the time that they off loaded the waste, and the quantity of waste off loaded. The produced water is pumped from the transporter's vehicle into a 750-barrel tank (see Photo Log "C", photo #3). There are also two 500-barrel tanks and a 250-barrel tank for excess receiving storage. The off loading area is equipped with a containment trench (see Photo Log "C", photo #4). The material in the trench is processed with the rest of the produced water. The oil and water separate in the tank. The oil is skimmed off and stored in holding tanks and sold as product. The water is discharged from the tank into separation ponds (or "skim pits") where additional separation occurs. There are two skim pits located on the west side of the Facility (see Photo Log "B", photo #'s 4 & 5). The pits are approximately 50 ft x 150 ft and were originally 20 feet deep. At the time of the inspection, both of the skim pits were covered with a thick layer of oil; however, the pits were covered with netting to reduce threats to wildlife (see Photo Log "C", photo #'s 1 & 6). The northern-most skim pit was not being used at the time of the inspection. The solids from the pit were going to be moved to another pit to dry and then landfarmed before the pit is reused. Mr. Maloney was in the process of removing the oil from the southern-most skim pit during the inspection (see Photo Log "B", photo #6). Oil recovered from the pits is stored in several tanks with capacities ranging from 300 to 1000 barrels located south of the receiving tanks (see Photo Log "C", photo #5). The water from the skim pits drains into a series of evaporation pits. There are seven evaporation pits located on site. No water is discharged from the Facility, it is all disposed of by evaporation. There are 13 groundwater monitoring wells surrounding the Facility. The first evaporation pit located adjacent to the two skim pits had oil and iron sulfide (FeS) staining around the banks of the pit (see Photo Log "C", photo #7). No oil or staining was observed on the other evaporation pits. South of the skim pits and first evaporation pit is a pit for solids (see Photo Log "B", photo #7). Solids from the clean out of the skim pits are placed here to dry and then landfarmed. The Facility has a 6-acre pit on the south side of the Facility that is used for landfarming (see Photo Log "B", photo #9). Both the solids pit and landfarming pit appeared to contain soil saturated with oil and some pools of oily liquid. The Facility also has a small pit on the southwest side of the Facility that is used as a "catch-all" pit for overflows and spills. The pit contained oil and was covered with netting (see Photo Log "B", photo #8).

Mr. Maloney explained that the "oily discharge" FWS viewed from the air on September 17 was actually a tank clean-out process. He explained that they cleaned out the buildup of iron sulfide from the tanks and were

landfarming it in the pit on the south side of the Facility. Mr. Maloney provided copies of the receipts from the tank clean out which were dated September 17, 1998 (see Attachment A). There did not appear to be a discharge of oil from the Facility at the time of the inspection, although the solids in both the drying pit and the landfarm pit were heavily oiled and stained.

Representative samples were taken of the produced water in the receiving tanks and skim pits:

- The tank sample was collected from the pipe that leads from the tanks into the skim pit (sample #WP-19Tank). Mr. Malloney opened the valve at the tank to allow the liquid in the tank to flow into the pit. When the liquid flowing into the pit became oil rather than produced water, Mr. Maloney closed the valve and opened the valve to another tank.
- The pit sample was taken from the pipe leading from the skim pit to the evaporation pit (sample #WP-19PIT). There was not a valve to regulate the flow from this pipe.

Appropriate quality assurance and quality control (QA/QC) samples were collected. Adequate volume was collected to provide split samples to the Facility (duplicate QA/QC samples were not collected). A copy of the chain of custody form signed by Mr. Maloney is attached (Attachment B). The EPA samples were sent via Federal Express to Core Lab-Gulf States Analytical in Houston, Texas, for analysis (see Attachment C for the chain of custody). The samples were analyzed for volatile organic compounds, semi-volatile organic compounds, organochlorine pesticides, organophosphorus pesticides, chlorophenoxy herbicides, polychlorinated biphenols (PCBs), and HSL metals (Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Nickel, Potassium, Selenium, Silver, Sodium, Thallium, Vanadium, and Zinc). A summary table of the analytical results is included in Attachment D.

The FWS did not find evidence of wildlife mortality at the Facility during the inspection.

A Problem Oil Pit inspection checklist was completed during the inspection and is included as Attachment E. The inspection team left the Facility at 5:00pm at the request of Mr. Maloney. He explained that the Facility was closed and that the team was welcome to return during business hours the following day. The lead inspector determined that it would not be necessary to return to the site.

#### Areas of Concern

- Some oil staining around bank of first evaporation pit.
- Solids pit and landfarming area contained soil saturated with oil and some small pools of oily liquid.

#### Attachments

Photo Log "A"

Photo Log "B"

Photo Log "C"

- A Receipt for tank clean out
- B Chain of Custody for split samples
- C Chain of Custody for EPA samples
- D Analytical Data Summary
- E Problem Oil Pit Inspection Checklist

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## PHOTO LOG "A"

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 Subject:
 Aerial view of facility

 City/County:
 Loco Hills/Eddy County
 State: NM

 Date:
 09/17/98
 Time: unknown
 Weather: partly cloudy



 Photo Number:
 3
 Photographer:
 Greg Stover, FWS

 Location:
 Loco Hills Water Disposal

 Subject:
 Aerial view of run-off on south side of facility.

 City/County:
 Loco Hills/Eddy County
 State: NM

 Date:
 09/17/98
 Time: unknown
 Weather: partly cloudy

PHOTO LOG "B"

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Photo Number: 3 Photographer: Melissa Smith Location: Loco Hills Water Disposal Subject: Front of facility, unloading area, and receiving tanks 
 Subject:
 Front of lastracy,

 City/County:
 Loco Hills/Eddie County
 State: NM

 Date:
 11/02/98
 Time: am
 Weather: cool, sunny



Photo Number: 4 Photographer: Melissa Smith Location: Loco Hills Water Disposal Subject: Skim pit - not currently in use City/County: Loco Hills/Eddie County State: NM Date: 11/02/98 Time: am Weather: cool, sunny



Photo Number: 1\_\_\_\_\_Photographer: <u>Melissa Smith</u> Location: <u>Loco Hills Water Disposal</u> Subject: Front of facility, unloading area, and receiving tanks City/County: <u>Loco Hills/Eddie County</u> State: <u>NM</u> Date: <u>11/02/98</u> Time: <u>am</u> Weather: <u>cool, sunny</u>



Photo Number: 2\_\_\_\_\_Photographer: Melissa Smith\_\_\_\_\_ Location: Loco Hills Water Disposal Subject: Front of facility, unloading area, and receiving tanks City/County: Loco Hills/Eddie County\_\_\_\_\_State: NM\_\_\_\_\_ Date: 11/02/98\_\_\_\_Time: am\_\_\_\_\_Weather: cool, sunny\_\_\_\_\_



Photo Number: 5\_\_\_\_Photographer: Melissa Smith\_\_\_\_\_ Location: Loco Hills Water Disposal Subject: Skim pit - in use City/County: Loco Hills/Eddie County\_\_\_\_State: NM Date: 11/02/98 Time: am\_\_\_\_\_Weather: cool, sunny\_\_\_\_



hoto Number:	6 Photographer: Melissa :	Smith
Location:	Loco Hills Water Disposal	
Subject:	Oil being removed from skim	pit
City/County:	Loco Hills/Eddie County	State: NM
Date:	11/02/98 Time: am	Weather: cool, sunny



Photo Number:	8 Photographer: Melissa	Smith
Location:	Loco Hills Water Disposal	
Subject:	Overflow/spill pit with net	ting
City/County:	Loco Hills/Eddie County	State: NM
Date:	11/02/98 Time: am	Weather: cool, sunny





 Photo Number:
 9
 Photographer:
 Melissa Smith

 Location:
 Loco Hills Water Disposal

 Subject:
 Landfarming of solids

 City/County:
 Loco Hills/Eddie County
 State:
 NM

 Date:
 11/02/98
 Time:
 am
 Weather:
 cool, sunny

## PHOTO LOG "C"



 Photo Number: 2
 Photographer: T. Reeves

 Location: Loco Hills Water Disposal Pacility (WP19)

 Subject: Off loading of produced water, looking northeast.

 City/County: Loco Hills/Eddy County
 State: NM

 Date: 11/02/98
 Time: am
 Weather: sunny, cool

11 2 98



 Photo Number:
 3\_\_\_\_\_\_
 Photographer:
 T. Reeves

 Location:
 Loco Hills Water Disposal Facility (WP19)

 Subject:
 Receiving tanks, looking east.

 City/County:
 Loco Hills/Eddy County
 State: NM

 Date:
 11/02/98
 Time: am
 Weather: sunny, cool



 Photo Number: 4
 Photographer: T. Reeves

 Location: Loco Hills Water Disposal Facility (WP19)

 Subject: Containment trench at off loading area, looking north.

 City/County: Loco Hills/Eddy County
 State: NM

 Date: 11/02/98
 Time: am
 Weather: sunny, cool



 Photo Number: 5
 Photographer: T. Reeves

 Location:
 Loco Hills Water Disposal Facility (WP19)

 Subject:
 Recovered oil tank battery.

 City/County:
 Loco Hills/Eddy County
 State: NM

 Date:
 11/02/98
 Time: am
 Weather: sunny, cool



Photo Number:	6 Photographer: T. Reeves	
Location:	Loco Hills Water Disposal Facility	(WP19)
Subject:	Netting on settling/skim pond.	
City/County:	Loco Hills/Eddy County State:	NM
Date:	11/02/98 Time: am Weather	r: sunny, cool



 Photo Number:
 7
 Photographer:
 T. Reeves

 Location:
 Loco Hills Water Disposal Facility (WP19)

 Subject:
 Oil and FeS staining on bank of evaporation pond.

 City/County:
 Loco Hills/Eddy County
 State:

 Date:
 11/02/98
 Time: am
 Weather: sunny, cool

## ATTACHMENT A

ACCOUNTING ADDRESS: STEVE CARTER, INC. P. O. BOX 26 LOCO HILLS, N.M. 88255 PHONE: HOT OIL UNITS -- OIL FIELD TRANSPORTS -- PUMP TRUCK (505) 677-2320 LOCO HILLS, NEW MEXICO DAY OR NIGHT NUMBER: DATE. (508) 677-3113 TRUCK NQ.59 nice CAPACITY 20 )ein BBLS. DRIVER. SHIPPED FROM SHIPPED TO\_ LEASE DESCRIPTION HAS OF SBLS RATE AMOUNT TAX TOTAL Clan, Kinse Gooobbl 61.00 50 335 120 TANK 130 E + 2" Thick 120 Q RN ToTal 5 . 3:00 LAWD 9:22 TIME T!ME STARTED FINISHED 240 COMPANY NAME TOTAL HOURS 3Y: Bryan Printers & Stationers, Inc. Form No.1963-D1

CCOUNTING ADDRESS: P.O. BOX 36 LOCO BILLS. N.M. 88255 PHONE: (505) 677-2320 DAY OR NIGHT NUMBER:	HOT OIL UNITS - OIL FIEL	ARTE	<b>R, INC</b> s - pump tru xico	С.	-17-9	4091
(605) 677-3113 DRIVER	Marting Hills Brink			DATE	PACITY	30 <sup>BBLS.</sup>
SHIPPED TO	Hills Suso		LEASE	ACO HI	7/4 5.4	Л. Ю.
DESCRIPTION	HAS, OR OST	RATE	ANOUNT	TAX		TOTAL
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### ATTACHMENT B



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## ATTACHMENT C

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Relinquished by Sampler: (Signature) Date Time: (700 Received by: (Signature) Date Time:	Relinquished by. Sampler: (Signature)       Date       Time:       Received by: (Signature)       Date       Time:         Relinquished by: (Signature)       Date       Time:       1/2/70       C 700       Pate       Time:       # #         Relinquished by: (Signature)       Date       Time:       Received by: (Signature)       Date       Time:       # #         Relinquished by: (Signature)       Date       Time:       Received by: (Signature)       Date       Time:       # #
	Relinquished by: (Signature)/ Date Time: Received by: (Signature) Date Time:

### ATTACHMENT D



#### TABLE 1-1

#### SUMMARY OF DETECTED CONSTITUENTS FOR WATER SAMPLES LOCATION 1, CARLSBAD, NEW MEXICO

Detected Constituent	WP-19-TANK	WP-19-PIT	EB-01		
HSL M	HSL Metals (SW-846 Methods 3051/6010B/7470A)				
Aluminum	109	1.42	< 0.0382		
Arsenic	4.1	0.217	< 0.0037		
Barium	16.1	0.342	< 0.0044		
Beryllium	0.069 T	0.0072	0.00097 T		
Cadmium	< 0.015	0.0010 T	< 0.00033		
Calcium	5,380	2,630	< 0.0088		
Chromium	5.1	0.0352	< 0.0021		
Cobalt	0.662 T	< 0.0011	< 0.0011		
Copper	39.0	< 0.003	< 0.003		
Iron	6,830	18.4	< 0.0199		
Lead	31.5	20.7	< 0.0047		
Magnesium	1,150	1,540	< 0.0376		
Manganese	34.8	1.81	< 0.00044		
Mercury	0.0102	< 0.0001	< 0.0001		
Nickel	17.0	0.0177 T	< 0.0017		
Potassium	1,250	2,250	0.426 T		
Selenium	< 0.41	0.0789	< 0.0091		
Silver	< 0.065	< 0.0014	< 0.0014		
Sodium	20,700	33,400	1.3 T		
Vanadium	< 0.045	< 0.0214 T	< 0.001		
Zinc	24.8	0.28	< 0.0017		
	Total VOCs (SW-846	Method 8260B)			
Acetone	1.3	1.8	< 0.01		
Benzene	8.5	3.3 D	< 0.005		
Ethylbenzene	1.0	0.54	< 0.005		
4-Methyl-2-pentanone	0.42 V	0.34	< 0.01		
Toluene	8.8	3.9	< 0.005		
Xylene (total)	2.9	1.2	< 0.015		

#### TABLE 1-1 (Continued)

#### SUMMARY OF DETECTED CONSTITUENTS FOR WATER SAMPLES LOCATION 1, CARLSBAD, NEW MEXICO

Detected Constituent WP-19-TANK WP-19-PIT EB-01							
	fotal SVOCs (SW-846	Method 8270C)					
Benzo(a)anthracene	0.0022 V	< 0.01	< 0.01				
Carbazole 0.0025 V 0.0022 V < 0.01							
Chrysene 0.0043 V 0.0026 V < 0.01							
Dibenzofuran	0.0 <b>098 V</b>	0.013	< 0.01				
2,4-Dimethylphenol	0.260 D	0.054	< 0.01				
Fluorene	0.01	0.011	< 0.01				
2-Methylnapthalene	0.12	0.11	< 0.01				
2-Methylphenol	0.67 D	0.12	< 0.01				
4-Methylphenol         0.72 D         0.20         < 0.01							
Naphthalene 0.13 0.081 < 0.01							
Phenanthrene         0.019         0.023         < 0.01							
Phenol         0.9 D         0.20         < 0.01							
Pyrene	0. <b>005 V</b>	0.003 V	< 0.01				
P	esticides (SW-846 Meth	ods 8081A/8141)					
	None Dete	cted					
Polyc	hlorinated Biphenyls (S	SW-846 Method 8082)					
None Detected							
Herbicides (SW-846 Method 8151)							
None Detected							

Notes:

All concentrations are reported in units of milligrams per liter (mg/L).

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Constituents reported in this table include those detected in at least one sample at a concentration greater than the reporting limit.

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### ATTACHMENT E

## PROBLEM OIL PIT INSPECTION CHECKLIST

## Site Number (State-Year-Waypoint):

LOCOHills #19 11/2/98

## Checklists Completed (circle those that apply):



Prepared by the US Environmental Protection Agency Region VIII and US Fish and Wildlife Service Region VI

revised 7/8/98

This is a pre-decisional document and is, or may be protected by the deliberative process exception and attorney client privilege. Conclusions or recommendations are intended solely as preliminary information for governmental personnel. This form may contain tentative conclusions and staff-level recommendations which are not binding on the Agency. This document does not create any rights, substantive or procedural, or defenses for any person.

## PROBLEM OIL PITANSPECTION CHECKLIST

SECTION ONE	2: Site Information		
Site Name:	Des Arus	Waypoint:	ſ
Lease Name:	nla	Lease Number: <u>M</u> A	
Site Location:			
Section <u>15</u>	_ Township <u>175</u> Range <u>19E</u>	59 20	
GPS Coordinates	s: Lat <u>32 49 88M</u> Long <u>1</u>	04 04 02 W	
City/County/Sta	te/Reservation: <u><u><u><u></u></u><u><u><u></u><u><u></u></u><u><u></u><u><u></u><u><u></u></u><u></u><u><u></u><u></u><u></u><u></u><u></u><u></u></u></u></u></u></u></u></u>	mby	
EPA Facility ID # o	or Other ID #'s:	· · · · · · · · · · · · · · · · · · ·	
Site Type (producti	on, commercial disposal, other):	unmercial Disposed	
Corporate Owner/C	perator Name and Mailing Address:	loco Hills water tisposed (	P.O. Box 68 <u>OP, 600 Hills, NM 8</u> 8255
Contact Name/Affi	liation/Phone: Dr. K. Wald	The VP (505)677-2118	1
List any known fed	eral, state, or tribal regulatory permits :	applicable to this site. Include all permit num	ber(s) and take photos of
any signage which	includes permit numbers: Wett -	Disposed 2) Ul treatine 3)	Brine lease
		<u> </u>	
SECTION TW	O: Inspection Information		
Inspection date:	11/2/98	Start time:3Oa	Finish time: $5:05\rho$
Describe weather c	onditions (including estimated temperat	INFO: SUMMA MODI	
Describe weather e	onditions (meruding estimated temperat		
Were <u>any</u> samples	taken during the inspection? Yes	No If yes, use a Continuation Sheet	to thoroughly document
not the sampling activity	re split (and with whom), sample type,	sample purpose, sample location, and parame	eters to be analyzed for.
Inspection Team:			
Inspector 1	Melliss Smith	Agency: EPA	Phone: 214-665-7357
Inspector 2	Poser anderson	Agency: <u>CCD</u>	Phone: <u>505-827-7152</u>
Inspector 3	Dava Mckenna	Agency: <u>FWS</u>	Phone: 505 - 589 - 2823
Inspector 4	Vince Balderaz	Agency: <u>BLM</u>	Phone: <u>505-393-3612</u>
Inspector 5	Tim Reeves	Agonoy: SAIC	Phone: 303-382-6730
Inspector 6	Ed Moriantz	Agency: SALC	Phone: 103-645-6973
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#### SECTION FOUR: Ecological Second

Use the Site Sketch in Section Three to identify significant ecological features (waterbodies, wetlands, vegetation, etc.)

#### A. GENERAL SETTING

#### SECTION THREE: Sketch of Site/Layout

Site Name :

Loco thils

Waypoint: \_

#19

Include the estimated size (including depth, if possible) of any pits and describe site operations on site sketch. Include description of pertinent features such as waters of the US (location of, distance to, description of conduits to, etc.), for example. Include a north arrow on site sketch.



#### **SECTION FIVE: General Observations**

#### A. PITS. Complete checklist A if any of the following conditions exist:

- 1. Does accumulated oil exist on the surface of any pits, ponds, sumps, or other open-topped storage devices ?
- 2. Are pits, ponds, tanks, sumps, or other devices which may accumulate oil covered with hetting or are there any other wildlife exclusionary or deterrent devices in use (covers, flagging, etc.)?
- 3. Are there any dead or oiled birds or other wildlife on or near the site or any indication of oiled birds/wildlife previously at or near the site (oily tracks, etc.)?

#### B. DISCHARGES. Complete checklist B if any of the following conditions exist:

- 2. Is there indication of any past or potential future discharge from a pit, pond, tank, or other device at the site (soil staining, fresh dirt or gravel used as cover, 2 ft or less freeboard maintained, eroded berms, etc.)?
- C. TANKS AND CONTAINERS [complete this section only if there are tanks or containers with oil on site with a capacity of 660 gallons (16 barrels) in a single taxk/container or total capacity of 1,320 gallons (31 barrels) in all tanks/containers on site]. Complete checklist C if any of the following conditions exist:
- 1. Is the secondary containment (dikes, berms, weirs) around tanks, containers, and heater-treaters absent? MM M blv m S
- 2. Is the secondary containment (dikes, berms, weirs) around tanks, containers, and heater-treaters inadequate (in size, material, eroded or worn down)?
- 3. Has there been a discharge or spill outside the secondary containment?

#### D. OTHER. Complete Supplemental Checklist if any of the following conditions exist:

- 1. Do you see or smell any air emissions (smoke, vapors, steam, dust) from any vent, stack, or other site activity or do you have any reason to believe that such an emission might exist?
- 2. Do you see pesticide containers in storage and/or trash areas?
- 3. Is there evidence that dredged or fill material is being or was removed from or discharged in or on the banks of waters of the US (e.g. ponds, streams, rivers, wetlands, dry arroyos, etc.) or that other inappropriate activities are occuring or having occured on waters of the US ? Yes
- 4. Do you see or suspect dumping of any solid or liquid materials at the site, including in pit or ponds (other than oil in pits or ponds as described above)? Yes
- 5. Do you see or suspect <u>any kind</u> of below ground or partially buried storage tanks (for fuels, chemicals or waste products such as waste or used oil)?
- 6. Do you see any liquid filled transformers or capacitors?
- 7. Is there any indication that hazardous waste is generated or otherwise managed at the site ?

Yes 🗸 No

Yes 🗸 No



Yes No 🗸

No Yes Yes

No \

NoV

No

No \

No

Yes No i

Yes\_\_\_ No 🗸

Yes

Yes

Yes


# PHOTO LOG (See field logbestz)

Site Number: WP19 Film Type/ASA/Size: Kada K 35mm Colon punt Photographer: Melima Snuth

Photo Number	Subject	Direction Photo Taken
	How of acility unloading area receiving tank	C SE
2	(sami)	
3	(same)	
Ļ.	Skim pit - not currently in use	S
5	Skimpit-in use	SE
<i>(</i> e.	oil being removed from skin set	
7	Solids from skim pits	SE ·
8	overflow/spill pet is netting	SW
9	landfarmine of solids	SE
	)	
Plittos	taken by Tim Reeves:	
1.	First separation pend (skin pet)	N
2,	Officiation of produced water	NE
3	receiving lanks	Ē
4	Containments trench at offloading area	N
5	Recovered at tank battery	NE
6.	Netting on settline / skim and	
7	Oil + Fes staining on bank of evaporation and	
	2	

#19

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#### PHOTO LOG (CONTINUED)



Photo Number	Subject				Direction Photo Ta	aken
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#### CHECKLIST "A" - PITS

1. If accumulated oil exists on the surface of any pits, ponds, sumps, or other open-topped storage devices, describe observed conditions including size of each pit, pond, sump, or device, percentage of area covered, and thickness of oil. Describe any other observations (visual, odor) of the material in each pit, pond, sump, or other device:

#19

2. Describe any netting or other wildlife exclusionary or deterrent devices in use at the site. Include description of condition, coverage, netting mesh size, etc.:

3. Describe any oiled or dead birds or other wildlife found at or near the site. Indicate the number of mortalities and the seizure numbers for any birds collected:

none. Feathers seen, but no birds.

4. Describe the construction and operation of any pits or ponds located at the site. Include a description of the pond liner system, if possible. Estimate the freeboard observed at the time of the inspection:

ho pond liners, skim pits are constantly howing into everp. pits

5. Indicate how long any pits or ponds at the site have been in operation:

Since 1982

If a pit, pond, sump, or other device is used as a loading/unloading area at a non-production site, describe any secondary containment used:

Page 9 of 13



## CHECKLIST "B" - DISCHARGES AND SPILLS

1. Indicate whether or not the site has a NPDES permit and, if so, indicate the permit number and whether or not the number is posted on site:

na

2. Describe any ongoing discharges or one-time spills from pits, ponds, or other devices at the site. For each discharge, include a description of the source, duration, and rate (gal/min or cfs) of material discharged. For each spill, describe the amount and area of the spilled material. Also describe any observations (oil sheen, odor) regarding the type of material discharged or spilled:

- 3. Describe any indications (e.g. soil / vegetation staining on ground or in drainages) of past discharges or spills from pits, ponds, tanks, or other devices at the site. Include any indication of the type of material discharged or spilled (e.g. oil stain, salt brine, etc.) and when and for how long the discharge or spill occurred:
- 4. Identify and describe the drainage pathway (dry arroyo, ditch, stream, etc.) of any current or suspected past discharges or spills from the site. Trace the drainage pathway to a flowing waterway, if possible, and describe the extent of any oil staining. Include a description of whether the drainage is dry at the time of the inspection, contains standing water that doesn't appear to be flowing or, if flowing, the estimated flowrate (gal/min or cfs) of water and/or discharged material:

5. Identify and describe any pits, ponds, or other devices in which less than 2 ft of freeboard exists at the time of the inspection. Also describe any indications that less than 2 ft of freeboard has been maintained in the past, such as staining of pond banks or overtopping of berms, etc.:

- 6. If possible, estimate the receipt rate or production rate (gal/day) of oil and/or produced water at the site:
- 7. If possible, determine whether or not any discharges or spills from the site have been reported and, if so, describe how (letter, phone, etc.), when, and to whom (EPA, BLM, DEQ, OGCC, BIA, etc.) it was reported:
- 8. Describe the general housekeeping and maintenance of the facility and any conditions which could result in a discharge or spill (valves which could be opened, poorly supported pipelines, etc.):

Page 11 of 13



	• #19
СН	ECKLIST "C" - TANKS AND CONTAINERS
1.	Is there a Spill Prevention, Control, and Countermeasure (SPCC) Plan on site? NO WWW Yes No
	Has it been certified by a registered Professional Engineer? Yes No How confirmed:
	If no SPCC Plan on site, is there one elsewhere? Yes No Where?
2.	Is the facility manned 8 hrs/day or more? Yes Ves Ves Ves
3.	Are there any flowing, non-flowing, or wetland water systems at or near the site? Yes No 🔨 . If yes, what is the
	distance from the site? Describe:
4.	Describe any threat/potential for spill (e.g. oil soaked containment; containment filled with water, debris, vegetation; leaking valves; overfilling of tanks; corroded tanks; holes in tanks; oil discharge at loading/unloading area; etc.):
5.	Is there a method to remove water from secondary containment, such as piping? Yes <u>No</u> Is it closed? <u>NO</u>
6.	If secondary containment is not adequate (in size, material, eroded or worn down), describe: $\eta \mid \alpha$ .
7.	Describe all items below. Be sure to include each tank/container and its secondary containment on the site sketch (Section Three). IMPORTANT: Estimate capacity or height and diameter of each tank/container, if not marked or known.

Tank / Container	Maximum		Height/		Secondary	Condition / Comments
Type and Use	Capacity	<u>or</u>	Diameter	Markings	Containment	(Corrosion, overtopping)

Set diagram on page 3

Page <u>13</u> of <u>13</u>



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Page \_\_\_\_ of \_\_\_\_

**OCD FILES** 35MM DRAWINGS NM 1004 FILE NUMBER General Correspondence DOCUMENT TYPE 1998 NO OF DWGS



Yates d." o Sa woli read . 15 M 01 Ani (Pan Am) (Carper Delig) (Ashmun C Kerseyeco Hilliord Mors-Guif 6274108 Corper-ABP TO 178 Cities Serv. No 178 Cities Serv. Cities Server Serv 874108 Reseatio 211. DG SUS 1 Periodie Mercey . "Lau . 5%." 32 Toles Pet. 3 Amoco · ..... 6101 069105 Tril Tri2 Tr. 11 IAnada Tao, et al Antweil, etal Gen Tyrner OI-B TO 3442 Fr. Cons stale" -Ti 1 Sign U.S. 70. 4527 Morry - Richfield THE FALL NAME 1/ Anodario Anadario TARL IAN Rupe Basset Anodarkoj Anadarko El I Haja Waler Indes Tr. 3 Valer Indes Tr. 4 Tr. 4 Valer Indes Tr. 4 Tr 18-1 82 (6 Birney, etal Cosilisa Londas Muncus Muncus Muncus Mainer Fed (Walker) (To 4932) Muncy Wointer-12-4 adorth HUTLOUT (Ambsdr.) (To 3741) -(Dia 6 29 59) TrZA AILRICHT TINHOI HEROT Exaon U.S. (Earris) Amoco Corri (Gutf) (Gutf) 12:1-79 12:1-79 Lorve L. Gulf Conoco (Salaxy 1/2 1.1.8) | Gulf 7/4 40449 | CBarton, 1.0449 | etal.1/4 18232 064009 Thomas . PORI OGYOCA 1 40448 1.C3 0 U.S. 1 AM O out \*F21# A moco Mar Des "Fed" Fed" BAmore and a Amaco HE I CPI yates Zapata i Helmerich TO 4510 - - + E. Payne, etal 1- 444 -- ()1-41 . -0 00 (Galdry & HE The States 48039 Conoco I Gulf 1/4) 10 morol 415 22 (C Borton 9018 etal 14 ) 10 4558 3 8 "Graham" Maxmell John D.Graham, etal (M) An Virgil Linam To 8850 1 ACAADUS. DIFAN "Fed" Golaxy 1/2 Yates Pet, Minntes Oil Guif 74, 14maco C Barton, 17 - 1- 82 etaiv4 9019 Amaco I -01 (0 17-1-02 A.N.Rupe 140451 18 1-02 H.B.Pelal 18 1 9016 140451 (A R.Co) J M 16350 40448 Quing tet Beard . 5 1 por the Bettis Bayle & 1 Sois . Storell Matrs Pet. 8 on the entol Conf Yates Pet, 9016 1,90 7 1. etal . etal -Buffola H.B.P at N. S. S. 3697 Young-Fed. TAR.Co 124014 3019 .0 110' D/R 11 (A flantic) 4 . U. Spraashi sec U.S. D/R 601 nes Ser. Bettis, Barte Storoll Sonta Fri JOIS Carp Yates Pet, etal 12 13 ( 4n. 9.11 - # 2 Co. 0.R) A.R. ARCa





THIS MAP COMPLIES WITH NATIONAL MAP ACCURICY STANDARDS FOR SALE BY U.S GEOLOGICAL SURVEY DENVER COLGRADO BO225 OR RESTON VIRGINIA 22092 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

1963 DMA 5243 V-SERIES V781









#### Gentlemen:

HEYCO proposes to dispose of salt water and associated produced fluids from HEYCO operated wells in Sections 1, 2, 3, 4, 11, 12 and 13, into properly constructed unlined disposal pits located at the following sites:

Section	1:	NE/4	SW/4
Section	2:	NW/4	SE/4
Section	3:	NW/4	NW/4
Section	4:	NW/4	SE/4
Section	11:	NW/4	NE/4
Section	12:	SE/4	NW/4
Section	13:	SE/4	SE/4
	Section Section Section Section Section Section	Section 1: Section 2: Section 3: Section 4: Section 11: Section 12: Section 13:	Section 1: NE/4 Section 2: NW/4 Section 3: NW/4 Section 4: NW/4 Section 11: NW/4 Section 12: SE/4 Section 13: SE/4

New Mexico Oil Conservation Division regulations state that offsetting operators and/or unleased mineral owners should be notified of a proposed conversion and waive objection to the operation.



### HARVEY E. YATES COMPANY

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ROSWELL, NEW MEXICO 88201

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	and the second
December 11, 1986	
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EQUESTED	
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Re: <u>Salt Water Di</u>	sposal on Leases
NM-2537	LC-047800(a)
NM-2538	LC-047800(b)
LC-058709(a)	LC-029388(d)
LC-058709(b)	LC-029389(b)
LC-062052	NM-28095
LC-062052(b)	

#### Gentlemen:

HEYCO proposes to dispose of salt water and associated produced fluids from HEYCO operated wells in Sections 1, 2, 3, 4, 11, 12 and 13, into properly constructed unlined disposal pits located at the following sites:

1.	Section	1:	NE/4	SW/4
2.	Section	2:	NW/4	SE/4
3.	Section	3:	NW/4	NW/4
4.	Section	4:	NW/4	SE/4
5.	Section	11:	NW/4	NE/4
6.	Section	12:	SE/4	NW/4
7.	Section	13:	SE/4	SE/4

New Mexico Oil Conservation Division regulations state that offsetting operators and/or unleased mineral owners should be notified of a proposed conversion and waive objection to the operation.

32.32422 32.413 18.31. 1.44432 12.223 12.23144	34.324 18.30.21.4200 22.2220 26.4140 31.323	18.28.8.330 30.110 18.29.24.142 24.23311 24.300	10.200 10.214 28,13 28.140 33.42	22.110 29.400 17.31.34.000 18.27.8.240 8.244	17.28.14.220 19.200 22.230 24.224 17.29. 8.231	Location
Windmill Abandoned windmill Windmill Stock Stock	Stock Open cased hole Open cased hole Stock Observation	Stock Stock/domestic Windmill Windmill Stock	Unused Industrial Domestic/stock Unused Stock	Stock Stock Stock Unused Industrial	Stock/domestic Stock ` Abandoned stock Stock Stock	Records of Well Status
3380 3370 3797 3795 3775	3440 3495 3430 3430 3370	3560 3436 3430 3430	3470 3493 3377 3415 3447	3550 3505 3513	3565 3617	wells from E Altitude (feet)
266 480+ 600	250 223.0 161.0		130 120 90	381	33.88 92.7	ddy <u>Synty</u> , N Depth of Well(ft.)
161.28 158.77 460.42 453.39 435.34	230 266.48 239.26 201.67 157.80	81.6 137.1 156.44 160.20 158.3	46.92 50 100 91.37 49.3	79.7 210 271+ 181.40 325 ?	80 224.3 45.5 24.2 90.13	ew Mexico Depth to Water(ft.)
Trc] Trc] Trc]	Trcl Trcl Trcl	Ckbf/Rslr Ckbf ? Trsc Dckm		Dckm ? Dckm ? Dckm	Dckm ? Ckbf/Rslr Rslr/Dckm	Aquifer
Apr.8,1971 Oct.18,1977 Apr.7,1971 Oct.18,1977 Apr.7,1971 Apr.7,1971	Mar.,1960 Dec.9,1965 Apr.8,1971 Dec.14,1977 Nov.18,1977	Dec.3,1948 Dec.2,1948 Oct.18,1977 Apr.8,1971 Apr.28,1950	Jan.9,1964 Jul.,1958 May,1960 Jan.9,1964 Sep.,1969	Nov.29,1948 Dec.3,1948 Dec.6,1948 Jan.9,1964 Apr.,1951	Dec.2,1948 Dec.1,1948 Oct.14,1977 Oct.14,1977	Date of Measurement
	Yield: 63gpm S.C. 1100	S.C.2600; 21 <sup>0</sup> C	0il test	Oil test		Remarks

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Location 18.31.14.22133 35.31324 19.27.13.310 14.242 16.13 19.28.2.122 2.23311 5.21114 5.21114 5.21114 13.210 13.21441 18.120 18.12113 19.11 24.32233 33.21422 36.43233	Well Status Open cased hole Domestic Dug well Stock/Domestic Stock Domestic/Stock Windmill Stock Stock Stock Stock Stock Stock Stock Windmill Stock Windmill Windmill	Altitude (feet) 3731 3450 33450 33450 3342 3460 3439 3547 3547 3545 3592 3595 3595 3595 3595 3595 3595 359	Depth of Well(ft.) 400 300 75 926 160 160 160 160 160 100 100 170 125 87	Depth to Water(ft.) 377.30 261.08 60.7 82.4 18 128.3 153.84 153.62 145 265 154.5 153.02 82.8 74 88.31 91 130.10 123.41 121.07 71.75	Aquifer Trc1 Trc1 Ckbf Ckbf Rs1r Rs1r Rs1r Rs1r Rs1r Rs1r Rs1r Rs1r	Date of Measurement Apr.6,1971 Apr.5,1971 Sep.3,1948 Jan.20,1950 Jan.20,1950 Jan.22,1968 Jan.28,1971 Nov.,1969 May,13,1966 Dec.3,1948 Feb.1,1971 Sep.3,1948 Mar.,1972 Jan.28,1971 Dec.21,1948 Jan.28,1971 Feb.1,1971 Feb.1,1971	Remarks Very small yi North well of Yield: 1gpm(6 24 hrs. pumpi 24 hrs. pumpi Yield: 3gpm Yield: 3gpm
19.28. 2.122 2.23311 5.21114 5.411 9.31 13.210 13.21441 18.120 18.120 18.12113	Stock Donnestic/Stock Windmill Stock Stock Stock Stock Stock Stock Stock	3460 3547 3547 3545 3370 3490 3505	160 160.0 312 365 160 93 100	128.3 153.84 150.62 145 265 154.5 153.02 82.8 74 88.31	Rs]r ? Rs]r Rs]r Rs]r Rs]r Ckbf ? Rs]r	Dec.13,1948 Apr.2,1968 Jan.28,1971 Nov.,1969 May,13,1966 Dec.3,1948 Feb.1,1971 Sep.3,1948 Mar.,1972 Jan.28,1971	Yield: 1gp Yield: 60g 24 hrs. pu Yield: 3gp Yield: <sup>1</sup> 2(es
19.11 24.32233 33.210 33.21422 36.43233	Stock Windmill Stock Windmill Windmill	3495 3351 3545 3292 3370	100 170 125 87 153.0	91 130.10 123.41 121.07 71.75 145.84	Rslr Rslr Rslr Rslr Rslr	Mar.,1972 Feb.1,1971 Dec.21,1948 Jan.28,1971 Feb1,1971 Feb.1,1971	
19.29.10.43211 13.410 13.41224 13.412243 20.220 20.22111 23.23144 25.232	Stock Stock Windmill Open cased hole Stock Windmill Stock	3370 3310 3311 3305 3268 3355	153.0 250 85.0 125.7	145.84 123.2 113.03 110.64 62.9 66.87 68.91 64.03	Rslr Rslr/Dckm Rslr Rslr Rslr ? Rslr Rslr Rslr	Feb.1,1971 Dec.21,1948 Dec.9,1965 Feb. 1, 1971 Dec. 13,1948 Feb.1,1971 Feb.1,1971 Feb.1,1971 Oct.18,1977	Yield: 2gp Yield: 1gp
19.30. 9.441 17.441	Industrial Stock	3358 3329	300	142.70	Rs1r Trsc	Feb. 1,1971	3.L.2990; Yield:500;

Records of wells from Eddy County, New Mexico

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**OCD FILES 35MM DRAWINGS** NM 1004 FILE NUMBER General Correspondence DOCUMENT TYPE 1998 **NO OF DWGS** 







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## Loco Hills 8/27/97



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