

NM1 - 12

**GENERAL
CORRESPONDENCE**

YEAR(S):

2007 - 1992



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

April 12, 2007

Mr. Jimmie T. Cooper
C & C Landfarm, Inc.
Box 55
Monument, New Mexico 88265

**RE: Request To Add An Additional Six-Inch Lift And/Or Use Soil For Backfilling Or Berming
Permit NM-01-0012 (C & C Landfarm)
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico**

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) has received and reviewed C & C Landfarm (C&C), Inc.'s request, dated March 27, 2007, to add an additional six-inch lift and/or use soil from Cells E and K for backfilling or berming. Based upon the information provided, Cells E and K are hereby approved for the addition of another lift of contaminated soils. Note, that with the addition of successive lifts C&C must resume maintenance and treatment zone monitoring. The treatment zone monitoring depth must be adjusted to reach the 2-3 foot zone below the original native ground surface. In addition, C&C's request to reuse the soil from these cells is hereby approved with the following uses:

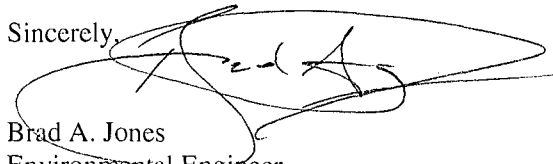
1. Use remediated soils in the berms and roads within the C&C Landfarm facility.

Application of these soils in the approved project list above must not result in run-off into any waters of the U.S. If C&C wants to move the soils from these cells for any other use other than those approved here, separate OCD authorization must be granted. Soils to be removed from the facility must have additional analysis performed, including metals and chlorides.

Please be advised that approval of this request does not relieve the C&C of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve C&C of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,


Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs
Eddie Seay, Eddie Seay Consulting, 601 W. Illinois, Hobbs, NM 88242

March 27, 2007

2007 MAR 30 PM 12 40

NMOCD Environmental
ATTN: Brad Jones
1220 S. Saint Francis Drive
Santa Fe, NM 87504

NM 1-12

RE: C & C Landfarm
Cell Lift Sample

Mr. Jones:

Attached is analytical from cells E and K of the lift for C & C Landfarm. A composite sampling was conducted for each cell, taking samples at a depth of 0 to 6 inches. The analytical is below State and permit requirements for adding an additional lift. C & C is requesting to add an additional six inch lift to each of the two cells tested, and/or use the soil in the cells for road repair or berm work.

At your earliest convenience please let me know if this is approved.

Sincerely,



Eddie W. Seay, Agent
Eddie Seay Consulting
601 W. Illinois
Hobbs, NM 88242
(505)392-2236
seay04@leaco.net

cc: C & C Landfarm



PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

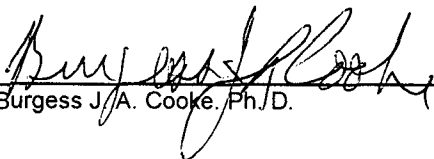
ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88242
FAX TO: (505) 392-6949

Receiving Date: 03/19/07
Reporting Date: 03/22/07
Project Owner: J. COOPER
Project Name: C&C LANDFARM
Project Location: MONUMENT, NM

Sampling Date: 03/19/07
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/LB

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		03/19/07	03/19/07	03/21/07	03/21/07	03/21/07	03/21/07
H12356-1	CELL E	<10.0	60.5	<0.002	<0.002	<0.002	<0.006
H12356-2	CELL K	<10.0	18.6	<0.002	<0.002	<0.002	<0.006
Quality Control		757	777	0.109	0.114	0.110	0.333
True Value QC		800	800	0.100	0.100	0.100	0.300
% Recovery		94.7	97.1	109	114	110.0	111
Relative Percent Difference		6.3	1.0	1.7	<0.1	0.7	1.0

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8021 B


Burgess J. A. Cooke, Ph.D.

3/22/07
Date

H12356

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



CARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240 2111 Beechwood, Abilene, TX 79603
(505) 393-2326 FAX (505) 393-2476 (325) 673-7001 FAX (325) 673-7020

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

BILL TO

ANALYSIS REQUEST

Company Name: Eddie Seay Consulting
Project Manager: Eddie Seay

P.O. #:

Address: 601 W Illinois

Company:

City: Hobbs

State: NM Zip: 88242

Attn:

Phone #: 393-2236

Fax #: 393-2476

Address:

Project #: C+C Landform Project Owner: J. Cooper

City:

Project Name: C+C Landform

State:

Project Location: Marland NM

Phone #:

Sample Name: E.D. 10 W Seay

Fax #:

FOR LAB USE ONLY

Lab I.D. Sample I.D.

(G)RAB OR (C)OPE
CONTAINERS
GROUNDWATER
WASTEWATER
SOIL
OIL
SLUDGE
OTHER:
ACID/BASE:
ICE / COOL
OTHER:

DATE TIME

TPH 825
BTX

H12356-1
-2
Coe E
Coe K

✓
✓
✓
✓

3/19 8:30
3/19 9:40

✓
✓
✓
✓

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: Eddie Seay Date: 3/19 Received By: Benjamin

Phone Result: ☐ Yes ☐ No Add'l Phone #: Cole Liff

Fax Result: ☐ Yes ☐ No Add'l Fax #: Cole Liff

Relinquished By: Eddie Seay Date: 3/19 Time: 12:30

Received By: Benjamin

Date:

Time:

Delivered By: (Circle One)

Sample Condition: ☒ Cool ☐ Intact

CHECKED BY: (Initials)

Sampler - UPS - Bus - Other:

☒ Yes ☐ No

† Cardinal cannot accept verbal changes. Please fax written changes to 505-393-2476

May 22, 2006

2006 MAY 30 PM 2 03

NM-1-012

NMOCD Environmental
ATTN: Ed Martin
1220 S. Saint Francis Drive
Santa Fe, NM 87504

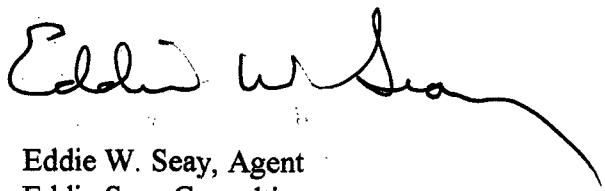
RE: C & C Landfarm
Quarterly Treatment Zone

Mr. Martin:

Find within the quarterly treatment zone tests from the various cells at C & C Landfarm. Samples were taken at approximately two feet below the cell lift. The sample holes were filled with red clay. An inspection of the landfarm was conducted during sampling and all was in compliance.

If you have any questions, please call.

Thanks,



Eddie W. Seay, Agent
Eddie Seay Consulting
601 W. Illinois
Hobbs, NM 88242
(505)392-2236
seay04@leaco.net



ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240


ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88240
FAX TO: (505) 392-6949

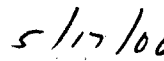
Receiving Date: 05/11/06
Reporting Date: 05/16/06
Project Owner: J. COOPER
Project Name: C&C LANDFARM QUARTERLY
Project Location: MONUMENT, NM

Sampling Date: 05/11/06
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: NF
Analyzed By: BC

LAB NO.	SAMPLE ID	GRO (C ₆ -C ₁₀) (mg/Kg)	DRO (>C ₁₀ -C ₂₈) (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		05/13/06	05/13/06	05/12/06	05/12/06	05/12/06	05/12/06
H11109-1	CELL A	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-2	CELL B	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-3	CELL C	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-4	CELL D	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-5	CELL E	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-6	CELL F	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-7	CELL G	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-8	CELL H	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-9	CELL I	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-10	CELL J	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
H11109-11	CELL K	<10.0	<10.0	<0.005	<0.005	<0.005	<0.015
Quality Control		784	773	0.094	0.101	0.098	0.307
True Value QC		800	800	0.100	0.100	0.100	0.300
% Recovery		98.0	96.6	93.4	101	97.9	102.0
Relative Percent Difference		3.1	0.4	0.2	7.9	7.2	7.8

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8260.


Larry L. Bailey


Date

H11109

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

Company Name: Edlin Scott Consulting		BILL TO		ANALYSIS REQUEST	
Project Manager: Edlin Scott		P.O. #:			
Address: 601 W. Indiana		Company:			
City: Madison		Attn:			
State: NW Zip: 88240		Address:			
Phone #: 392.2234 Fax #: 392.6449		City:			
Project #: C4C Landform Project Owner: J. Eagan		State:			
Project Name: C4C Landform Quadrant		Zip:			
Project Location: Manuport NM		Phone #:			
Sample Name: Edlin Scott		Fax #:			
FOR LAB USE ONLY		MATRIX		SAMPLING	
Lab I.D.		Sample I.D.			
H11109-1		C4C A		DATE	
-2		C4C B		TIME	
-3		C4C C			
-4		C4C D			
-5		C4C E			
-6		C4C F			
-7		C4C G			
-8		C4C H			
-9		C4C I			
-10		C4C J			
		GROUNDWATER			
		WASTEWATER			
		SOIL			
		OIL			
		SLUDGE			
		OTHER:			
		ACID/BASE:			
		ICE / COOL			
		OTHER:			
		PRESERV.			
		OTHER:			
		DATE			
		TIME			
		BTEx			
		TPH (8015)			

† Cardinal cannot accept verbal changes. Please fax written changes to (325) 673-7020.

ARDINAL LABORATORIES INC

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(325) 673-7001 Fax (325) 673-7020 (505) 393-2328 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, February 08, 2007 9:11 AM
To: Eddie Seay (seay04@leaco.net)
Subject: C&C Landfarm (Permit NM-01-0012) - Rocks

Dear Mr. Seay,

The New Mexico Oil Conservation Division hereby grants approval of the disposal of rocks, that do not possess any visible signs of petroleum and/or crude oil contamination, generated and collected from landfarming and rock picker activities to be placed in the top soil excavation pit located in the southeast corner of the C & C Landfarm permitted facility boundary. If you have any questions regarding this matter, please do not hesitate to contact me.

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

February 6, 2007

Mr. Jimmie T. Cooper
C & C Landfarm, Inc.
Box 55
Monument, New Mexico 88265

**RE: Request To Add An Additional Six-Inch Lift And/Or Use Soil For Backfilling Or Berming
Permit NM-01-0012 (C & C Landfarm)
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico**

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) has received and reviewed C & C Landfarm (C&C), Inc.'s request, dated February 1, 2007, to add an additional six-inch lift and/or use soil from Cells A, B, and C for backfilling or berming. Based upon the information provided, Cells A, B, and C are hereby approved for the addition of another lift of contaminated soils. Note, that with the addition of successive lifts C&C must resume maintenance and treatment zone monitoring. The treatment zone monitoring depth must be adjusted to reach the 2-3 foot zone below the original native ground surface. In addition, C&C's request to reuse the soil from these cells is hereby approved with the following uses:

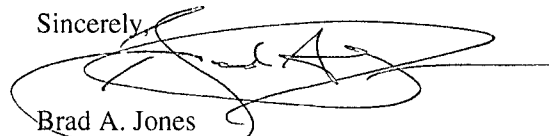
1. Use remediated soils in the berms and roads within the C&C Landfarm facility.

Application of these soils in the approved project list above must not result in run-off into any waters of the U.S. If C&C wants to move the soils from these cells for any other use other than those approved here, separate OCD authorization must be granted. Soils to be removed from the facility must have additional analysis performed, including metals and chlorides.

Please be advised that approval of this request does not relieve the C&C of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve C&C of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs
Eddie Seay, Eddie Seay Consulting, 601 W. Illinois, Hobbs, NM 88242

February 1, 2007

2007 FEB 5 PM 12 11

NMOCD Environmental
ATTN: Brad Jones
1220 S. Saint Francis Drive
Santa Fe, NM 87504

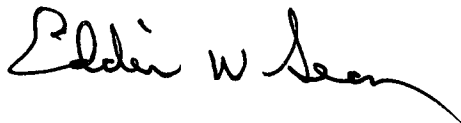
RE: C & C Landfarm
Cell Samples

Mr. Jones:

Find attached composite sampling of the three cells at C & C Landfarm. The analysis are below the requirement for BTEX and TPH for adding an additional lift. C & C is asking permission to either add an additional lift to these cells or use this soil for backfilling material.

We appreciate your time in this matter. Look forward to hearing from you.

Sincerely,



Eddie W. Seay, Agent
Eddie Seay Consulting
601 W. Illinois
Hobbs, NM 88242
(505)392-2236
seay04@leaco.net

cc: C & C Landfarm



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 23, 2007

Mr. Jimmie T. Cooper
C & C Landfarm, Inc.
Box 55
Monument, New Mexico 88265

**RE: Request To Add An Additional Six-Inch Lift And/Or Use Soil For Backfilling Or Berming –
Permit NM-01-0012
C & C Landfarm
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico**

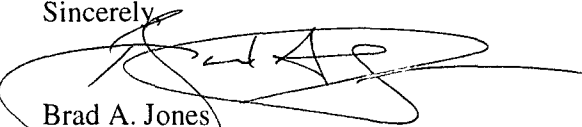
Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) has received and reviewed C & C Landfarm, Inc.'s request, dated January 17, 2007, to add an additional six-inch lift and/or use soil from cells A, B, and C for backfilling or berming. The submittal included laboratory analytical results for Gas Ranges Organics (GRO) and Diesel Range Organics (GRO). The OCD cannot consider this request for approval until Condition #6 of the "Landfarm Operation" section of Permit NM-01-0012 is demonstrated and satisfied. Condition #6 states:

"Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the pervious lift is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts and/or removal of the remediated soils."

This request is denied. Please resubmit a request with the appropriate laboratory analytical results. If you have any questions, regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,


Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District I Office, Hobbs
Eddie Seay, Eddie Seay Consulting, 601 W. Illinois, Hobbs, NM 88242



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

March 3, 2005

Mr. Jim Cooper
C & C Landfarm, Inc.
P.O. Box 55
Monument, NM 88265

Re: Commercial Waste Management Facility, NMOCD permit NM-1-012

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (NMOCD) inspected the facility shown above on February 8, 2005. The berms at the landfarm have been very well maintained and the soils have apparently been disked and turned on a regular basis. No permit deficiencies were noted.

If you have any questions, contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script, reading "Ed Martin".

Edwin E. Martin
Environmental Bureau

cc: NMOCD, Hobbs



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 15, 2002

Mr. Dennis French
807 North Thorp
Hobbs, NM 88240

RE: C&C Landfarm Inc.
NMOCD Permit NM-01-0012
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico,

Dear Mr. French:


Enclosed please find the New Mexico Oil Conservation Division Permit with conditions for C&C landfarm, Inc.(C&C). I inspected the facility on April 13, 2000 and again on June 7, 2001. Enclosed please find the inspection report for April 24, 2000 and the subsequent response by C&C. I was unable to put together a timely inspection report for my June 2001 inspection because of a three-month maternity leave from July to October of 2001.

All quarterly treatment zone monitoring analytical reports have been submitted in a timely fashion since the initial permit was received in 1992. To date there has been no leaching of contaminants to the subsurface. As an example please find enclosed a copy of the most recent treatment zone monitoring report for C&C landfarm.

I have planned an inspection trip to Lea and Eddy counties for early November of this year and will be inspecting C&C along with other permitted surface waste management facilities as time allows. I will forward you a copy of the next inspection report for C&C when it is finalized.

Please call me if you have any further questions regarding this facility.

Sincerely:


Martyne J. Kielling
Environmental Geologist

XC: Hobbs OCD Office

C&C

STATE OF NEW MEXICO
ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal Time 11:00 Date 10-8-02

Originating Party

Other Parties

Denis French

Marlyne Kicking

505-393-5778

Subject Questions Regarding C&C Land Farm
Last Inspected, Permit Requirements
Potentially Purchasing Land Adjacent - Had Environmental concerns

Discussion Concern that He called Hobbs District Office
and ~~was~~ did not receive a return phone call. It has been
2 weeks.

I answered His C&C Questions and He Requested
to be CC on Next Inspection Report.

Conclusions or Agreements I said I would try and CC Him on
My Next Report.

Distribution

Signed

Marlyne Kicking

Public Regulation Commission**3/6/2000****C & C LAND FARM, INC.****1580026****MAILING ADDRESS
PO BOX 55 MONUMENT NEW MEXICO 88265**

SCC Number: 1580026**Tax & Revenue Number: 02185650008****INCORPORATED ON SEPTEMBER 04, 1992 , IN NEW MEXICO.****CORPORATION IS A DOMESTIC PROFIT****CORPORATION IS ACTIVE
GOOD STANDING THROUGH: 3/15/2001****PURPOSE OF THE CORPORATION
DISPOSE OF OIL FIELD WASTE AND DEBRIS****CORPORATION DATES
Taxable Year End Date: 12/31/98 Filing Date: 12/02/99
Corporate Existence Expiration Date:****SUPPLEMENTAL POST MARK DATES
Supplemental: 01/06/95 Name Change: Purpose Change:****PRINCIPAL ADDRESS
419 WEST CAIN HOBBS NEW MEXICO 88240****PRINCIPAL ADDRESS(Outside New Mexico)**

**REGISTERED AGENT
JIMMIE T. COOPER
419 WEST CAIN HOBBS NEW MEXICO 88240****Designation date: 12/02/99 Agent Post Mark Date: Resignation date:****COOP LICENSE INFORMATION
Number: Type: Expiration Year:****COOPER, JIMMIE T. President
COOPER, JIMMIE B. Vice President
HILLIKER, ADANA Secretary**

COOPER, BETTY B. Treasurer

DIRECTORS

Date Election of Directors: 09/30/00

COOPER, BETTY B

419 WEST CAIN HOBBS , NM 88240

COOPER, JIMMIE B

419 WEST CAIN HOBBS , NM 88240

COOPER, JIMMIE T

419 WEST CAIN HOBBS , NM 88240

HILLIKER, ADANA

419 WEST CAIN HOBBS , NM 88240

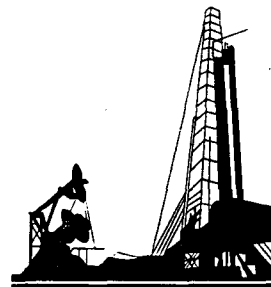
SEAY, EDDIE

419 WEST CAIN HOBBS , NM 88240

New Search Inquiry Page

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, NM 87505
(505) 827-7133
Fax: (505) 827-8177



(PLEASE DELIVER THIS FAX)

To: John Bell ^{Mattadore} 214-987-7123

From: Martyne Kieling 827-7153

Date: April 18, 2000

Number of Pages (Includes Cover Sheet) 1 of 11

Message: _____

See Page 4 Reporting # 4

Planning on Drilling wells Possibly within Land Farm

Martyne Kieling

**If you have any trouble receiving this, please call:
(505) 827-7133**



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

October 6, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-468

Mr. Eddie W. Seay
C&C Landfarm
601 W. Illinois
Hobbs, New Mexico 88240

**RE: Approval for additional lifts, C&C Landfarm
NW/4 NE/4 of Section 3, Twn. 20 South, Rng. 37 East, NMPM
Lee County, New Mexico**

Dear Mr. Seay:


The New Mexico Oil Conservation Division (OCD) has received C&C's request and analytical results dated August 28, 1998 for authorization to apply another lift to Cells B, D and F. Based on the information provided, Cell-B, Cell-D and Cell F are hereby approved for the addition of a successive lift.

Note that with the addition of successive lifts C&C must continue maintenance and treatment zone monitoring. If C&C wants to move the soils from the facility separate OCD authorization must be granted.

Please be advised that the OCD approval does not relieve C&C of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve C&C of the responsibility for compliance with other federal, state and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,


Martyne J. Kielling
Environmental Geologist

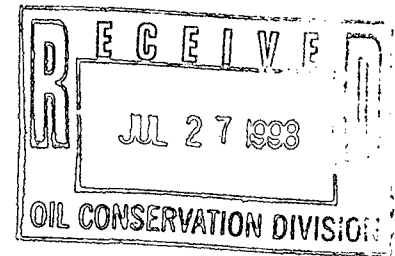
xc: OCD Hobbs Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT I HOBBS
PO BOX 1980, Hobbs, NM 88241
(505) 393-6161
FAX (505) 393-0720

Jennifer A. Salisbury
CABINET SECRETARY



July 23, 1998

Mark Veteto
ME-TEX Oil & Gas, Inc.
P.O. Box 2070
Hobbs, New Mexico 88241-2070

Re: J. Cooper #1 Drilling Pit
J. Cooper #2 Drilling Pit
W/2 NE/4, Sec 3-Ts20s-R37e

New Mexico Oil Conservation Division (NMOCD) is in receipt of your letter dated July 16, 1998 and will file your notice in the NMOCD Hobbs well files. A copy of your letter is being sent to the NMOCD Environmental Bureau for their files.

Please note the NMOCD has had discussions concerning this issue with the NMOCD Environmental Bureau, the Landowner Mr. Jimmy Cooper and yourself. Please note the burying of oilfield waste must be pursuant to NMOCD rules and regulations and must be in a manner that will not pose a threat to ground water, surface water, human health or the environment. Pursuant to conversations with the NMOCD Environmental Bureau, the permitting agency for the C&C landfarm, burying of this waste must not cause the permitted part of the C&C landfarm to become in violation. If this happens then NMOCD Environmental Bureau will address this issue with C&C landfarm.

Please note NMOCD District I acceptance of your letter does not relieve ME-TEX of responsibility for compliance with any other federal, state, or local laws and/or regulations including regulations handled by the NMOCD Environmental Bureau. Also, ME-TEX is hereby advised that NMOCD rules & regulations may not in some circumstances supersede certain landowners rights. Therefore, this surface issue should be resolved between ME-TEX and Mr. Cooper landowner of C&C landfarm.

If you require any further information or assistance please do not hesitate to call (505-393-6161) or write this office.

Sincerely Yours,

Chris Williams-NMOCD District I Supervisor

cc: Roger Anderson-Environmental Bureau Chief, Santa Fe, NM
Mr. Jim Cooper- Landowner of C&C landfarm.



Wayne

July 16, 1998

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division, District I - Hobbs
P.O. Box 1980
Hobbs, NM 88240

Attn: Wayne Price

Re: J. Cooper #1 Drilling Pit
J. Cooper #2 Drilling Pit
W/2 NE/4, Sec. 3, T-20S, R-37E, Lea County, NM



Dear Wayne,

As previously discussed, the above mentioned drilling pits are located on C & C Inc.'s land farm. These pits are prepared and ready to be buried on site. The drilling pits were built for the accumulation of drill cuttings as Rule 105 of the Energy and Mineral Department Oil Conservation Division's Rules and Regulations require. Me-Tex Oil & Gas, Inc. recognizes and fully understands the risks and liabilities of burying these pits on C & C's land farm.

Should you have any questions or comments, please call me anytime.

Very truly yours,

Me-Tex Oil & Gas, Inc.


Mark Veteto, V.P.

MV:rh

Kieling, Martyne

To: Boswell, Jerry C
Subject: RE: C&C Landfarm

Jerry,

The C&C landfarm Permit # NM-01-0012 was issued April 30, 1998 and does contain the requested expansion.

Let me know if there is anything else I can help you with.

Martyne.

From: Boswell, Jerry C [SMTP:boswejc@texaco.com]
Sent: Monday, June 22, 1998 9:34 AM
To: Kieling, Martyne
Subject: RE: C&C Landfarm

Hi Martyne. Has NM OCD issued the new permit for the C&C Landfarm yet? If yes, does the new permit include the requested expansion, or only the originally permitted surface area? Thanks for your help.

Regards,
Jerry

> -----Original Message-----

> From: Kieling, Martyne [SMTP:MKieling@state.nm.us]

> Sent: Tuesday, March 24, 1998 8:43 AM

> To: 'boswejc@texaco.com'

> Subject: C&C Landfarm

> Importance: High

>

> Jerry,

>

> Here is the C&C inspection report that you requested. Please call or

> E-Mail

> if there is anything else I can help you with.

>

> <<lrpt497.wpd>>

>

> Martyne Kieling

> NM OCD << File: lrpt497.wpd >>



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 2, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-440

Mr. C. Gene Samberson
Heidel, Samberson, Newell & Cox
P.O. Drawer 1599
Lovington, New Mexico 88260

RE: C & C Landfarm, Inc. 80 Acre Expansion Application
N/2, NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico,

Dear Mr. Samberson:

The New Mexico Oil Conservation Division (OCD) received your letter dated May 13, 1998 regarding the above referenced commercial surface waste management facility permit. The concerns listed in your letter are addressed here:

The statement in the cover letter concerning tanks exceeding 16 feet in diameter and exposed pits, ponds, or lagoons is a standard notice that is placed on all 711 permits, including permits for facilities that cannot accept free liquids (see below). This is based on the Oil Conservation Commission Order No. R-8952 put into effect September 1, 1989 covering the protection of migratory birds.

C&C Landfarm Inc. Permit conditions clearly states: Permit NM-01-012, Landfarm Operation, Section 13, "No free liquids or soils with free liquids will be accepted at the facility".

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script, appearing to read "Martyne J. Kieling".

Martyne J. Kieling
Environmental Geologist

xc with attachments:
Hobbs OCD Office
Eddie W. Seay, C&C Landfarm, Inc.
Jimmie T. Cooper, C&C Landfarm, Inc.

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL & COX

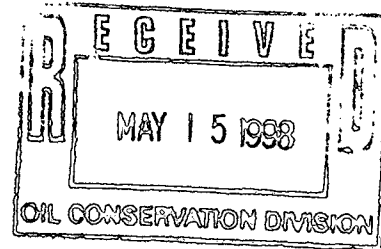
C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III

311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NEW MEXICO 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1985)

Patrick B. McMahon

May 13, 1998



Ms. Lori Wrotenbery, Director
State of New Mexico
Energy, Minerals and Natural
Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Re: OCD Rule 711 Permit Approval NM-01-0012
C & C Landfarm, Inc., 160 Acre
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East,
N.M.P.M., Lea County, New Mexico

Dear Ms. Wrotenbery:

I acknowledge receipt of a copy of your letter dated April 30, 1998, to Jimmie T. Cooper, along with a copy of the Attachment contained therein.

I am writing on behalf of S-W Cattle Co. regarding the language contained in the first full paragraph on page 2 of your letter. Specifically, the language regarding tanks exceeding 16 feet in diameter and exposed pits, ponds, or lagoons, seems to indicate that C & C Landfarm, Inc., is authorized under said Permit to have liquids other than fresh water located upon the land embraced in the Permit. My client and I had understood that the landfarm was authorized to accept solid waste only and there would not be liquids other than fresh water located on or involved in the activities conducted in the landfarm operation.

If our understanding is correct that C & C Landfarm, Inc., is not authorized to have liquids on the premises other than fresh water, I request that you so inform C & C Landfarm, Inc., in writing. If I am incorrect, I request that you advise me in writing immediately concerning what liquids, in addition to fresh water, C & C Landfarm, Inc., is authorized to have upon the premises as permitted.

Very truly yours,

HEIDEL SAMBERSON NEWELL & COX

By *C. Gene Sambersson*

CGS:te

pc: S-W Cattle Co.

LAW OFFICES

HEIDEL, SAMBERSON, NEWELL & COX

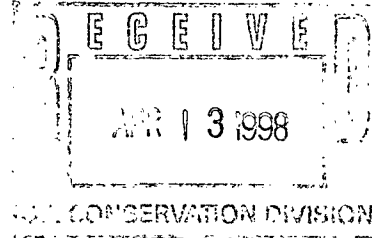
C. GENE SAMBERSON
MICHAEL T. NEWELL
LEWIS C. COX, III

311 NORTH FIRST STREET
POST OFFICE DRAWER 1588
LOVINGTON, NEW MEXICO 88260
TELEPHONE (505) 396-5303
FAX (505) 396-5305

F.L. HEIDEL
(1913-1986)

Patrick B. McMahon

April 9, 1998



New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

Attention: Martyne J. Kieling
Environmental Geologist

Via Fax Number (505) 827-8177 and Regular Mail

Re: C & C Landfarm, Inc., 80 Acre Expansion Application
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South,
Range 37 East, N.M.P.M., Lea County, New Mexico

Gentlemen:

I acknowledge receipt of Ms. Kieling's letter dated March 24, 1998, addressed to me concerning the above captioned matter.

On behalf of S-W Cattle Co., the following comments, concerns, and objections are submitted.

One part of Rule 711 governing commercial surface waste disposal facilities requires Applicant to provide geological/hydrological evidence to demonstrate that disposal of oil field waste will not adversely impact fresh water. We are not aware of any hydrological evidence submitted by the Applicant demonstrating that the proposed landfarm expansion will not adversely impact S-W Cattle Co.'s fresh water. The proposed 80 acre expansion of C & C Landfarm adjoins S-W Cattle Co.'s land where S-W Cattle Co. has a windmill located less than 1500 feet from the south boundary line of the 80 acre tract. Our visual examination of the area shows drainage from the 80 acre expansion to be to the south and not to the west as the Application states. The slope or decline from the 80 acre tract is to the south, with S-W Cattle Co.'s windmill being approximately forty feet (40') below the level of the 80 acre expansion. We still believe the runoff from the 80 acre tract will be to S-W Cattle Co.'s windmill. The water level in S-W Cattle Co.'s windmill is approximately eighteen feet (18') below the surface with approximately twenty-five feet (25') of thickness in water sand in the well. The redbed is approximately forty-five feet (45') below the surface of the windmill.

Under these circumstances, S-W Cattle Co. believes that a substantial risk exists for

contamination of its water supply by the proposed expansion.

S-W Cattle Co. does not believe that it should be placed in the position of incurring the expense and effort to demonstrate hydrological evidence supporting the existence of a substantial risk of contamination to its water supply. We believe that the burden of proof is properly upon the Applicant and we do not believe that the Applicant has done so.

S-W Cattle Co. objected to the original Application for a 40 acre landfarm located in the Southwest Quarter of the Northeast Quarter (SW/4NE/4) of said Section 3. It hired an expert; it presented witnesses in a hearing before the Oil Conservation Division; and it expended substantial financial resources to establish the risk to its water supply. That effort was rejected. In view of past experience, we feel that additional efforts to provide hydrological information would not be favorably viewed and would be a waste of our client's resources. However, in our opinion, this proposed 80 acre expansion is even more critically located (as described above) than the original 40 acre landfarm and, therefore, poses substantially more of a risk of contamination to S-W Cattle Co.'s water supply.

S-W Cattle Co. also has a major concern that the proposed bond of \$125,530.00 is inadequate. It is our understanding that this proposed bond would be the only bond required for closure of a 160 acre surface waste disposal facility. We further understand that the rule for surface waste disposal facilities may not authorize increasing the amount of bond at the time the facility permit is reviewed at the end of each five-year period. I am not aware of any financial information being furnished to your office demonstrating that in the event the bond is inadequate to properly complete closure, the corporate entity will have sufficient assets to complete the closure. If the expansion Application is to be granted, I request on behalf of S-W Cattle Co. that, as a condition of the permit, the cost of closure be reviewed periodically, and not less than once every five years, and that the bond amount be increased to meet the then current cost of closure. We anticipate that the OCD may find it necessary in the future to place additional requirements for closure of the facility in order to comply with applicable local and/or state and federal regulations which develop after more experience with the operation and closure of commercial surface waste disposal facilities. We feel certain that if additional requirements should be imposed in connection with closure, the bond is not adequate.

Likewise, we feel sure that the cost of closure will continue to increase and there is no provision for increasing the bond in order to merely keep pace with the increased costs of closure.

Very truly yours,

HEIDEL SAMBERSON NEWELL & COX

By *C. Gene Sambersson*

CGS:te
pc: S-W Cattle Co.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

March 24 , 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-409

Mr. Jimmie T. Cooper
C & C Landfarm Inc.
Box 55
Monument, New Mexico 88265

RE: OCD Rule 711
 C & C Landfarm Inc., 160 Acre
 W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
 Lea County, New Mexico,

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) has reviewed the C&C Landfarm, Inc. (C&C) closure cost estimate and attachments provided in the February 16, 1998 letter. Upon this review the OCD has revised the OCD's closure cost estimate for C&C according to the enclosed attachment.

In addition, please find enclosed a copy of the letter to Mr. C. Gene Samberson of Heidel, Samberson, Newell & Cox. The above letter gives notice to S-W Cattle Co. that C&C Landfarm, Inc. proposed commercial surface waste management expansion has been determined to be approvable subject to the attached conditions.

If no further objections are put fourth by any intervenors by April 10, 1998. The new C&C permit covering both the original 80 acres and the 80 acre expansion will go to the Director for approval.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely

Martyne Kieling
Environmental Geologist

xc with attachments:
Hobbs OCD Office
Eddie W. Seay, C&C Landfarm, Inc.

Revised
OCD ENVIRONMENTAL BUREAU CLOSURE COST ESTIMATE
For C&C LANDFARM EXPANSION, 80 ACRES
MARCH 17, 1998

Quarterly Analytical Analysis for two years on 12 five acre cells

Laboratory Under State Contract: Price per analysis

BTEX \$ 40.00	x 8 quarters x 12 cells	= \$3,840.00
TPH \$ 50.00	x 8 quarters x 12 cells	= \$4,800.00
Metals \$200.00	x 2 years x 12 cells	= <u>\$4,800.00</u>
		\$13,440.00 Analytical

Quarterly Sampling Time and Labor for 12 Cells

Labor \$55.00/hour
Sample 30min per cell
Travel 2 hours
Delivery & Paperwork 2 hours

Total Time = (30min/cell x 12 cells) + 2 hours + 2 hours = 10 hours

10 hours x \$55.00/hour = \$550.00/sampling event

\$550.00/sampling event x 8 quarters = **\$4,400.00 Labor**

Disking/Tilling for Two Years Every Two Weeks for 63 acres

Price and Time Quotes from and Equipment Operators and Landfarm Operators:

Small Tractor and Operator \$35.00 /hour
5 acres per hour = 12 min per acre

63 acres x 12min x 52weeks = 39,312 min = 655 hours

655 hours x \$35.00/hour = **\$ 22,925.00 Disking/Tilling**

Water for Bioremediation

Price Quotes from Equipment Operators

Water Truck \$120.00/load

$\$120.00/\text{load} \times 10 \text{ loads} \times 12 \text{ Events in Two Years} = \$14,400.00 \text{ Water}$

Level and Contour Landfarm

Price and Time Quotes from and Equipment Operators

D-6 Dozer and Operator \$75.00/hour

$\$75.00/\text{hour} \times 30 \text{ min} \times 80 \text{ acres} = \$3,000.00 \text{ Level \& Contour Landfarm}$

Revegetation for 80 Acres

Price and application Quotes from Seed Companies

Equipment an labor cost

Tractor and seed drill \$30.00/hour @ 15 min/acre for 80 acres = \$600.00

Materials Cost

Seed \$10.00/lb @ 5 lb/acre for 80 acres = \$4,000.00

$\$1,200.00 + \$4,000.00 = \$4,600.00 \text{ Revegetation}$

Total Closure and Revegetation Cost of an 80 acre Landfarm = \$62,765.00

Total Closure and Revegetation Cost for the Existing 80 acre C&C

Landfarm Plus the 80 acre Expansion = \$125,530.00

Closure cost bonds will be no more than \$250,000.00 per existing facility as per Rule 711.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

March 24, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-407

Mr. C. Gene Samberson
Heidel, Samberson, Newell & Cox
P.O. Drawer 1599
Lovington, New Mexico 88260

RE: C & C Landfarm, Inc. 80 Acre Expansion Application
N/2, NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico,

Dear Mr. Samberson:

The New Mexico Oil Conservation Division (OCD) permits commercial surface waste management facilities which receive oil field related waste. The C&C Landfarm, Inc. proposed commercial surface waste management expansion has been determined to be approvable subject to the attached conditions. The application and supplemental information submitted are in compliance with all Division rules and regulations, and are open for public inspection at the OCD Santa Fe Office.

Heidel, Samberson, Newell & Cox filed an objection to the application of C&C Landfarm, Inc. on behalf of S-W Cattle Co. If S-W Cattle Co. still objects to the application and wishes to present technical testimony at hearing in Santa Fe, please submit a request for hearing within 15 days of date of this letter or by April 10, 1998. The request should include a concise statement of objections or concerns and a summary of the evidence you will present at hearing. If the Director determines that intervenors such as S-W Cattle Co. Have significant additional information to offer, the matter will be set for hearing. The OCD cannot consider land use or zoning requirements when evaluating surface waste management applications.

If no request for hearing is received by April 10, 1998 then the application will be administratively approved. If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kieling
Environmental Geologist

xc with attachments:

Hobbs OCD Office
Eddie W. Seay, C&C Landfarm, Inc.
Jimmie T. Cooper, C&C Landfarm, Inc.

CONDITIONS FOR OCD 711 PERMIT APPROVAL

PERMIT NM-01-0012

C&C LANDFARM, INC.

**W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico.**

(March 24, 1998)

LANDFARM CONSTRUCTION

1. The facility will be fenced and have a sign at the entrance. The sign will be legible from at least fifty (50) feet and contain the following information: a) name of the facility, b) location by section, township and range, and c) emergency phone number.
2. Contaminated soils will not be placed within one hundred (100) feet of the boundary of the facility.
3. Contaminated soils will not be placed within twenty-five (25) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.
4. The portion of the facility containing contaminated soils will be bermed to prevent runoff and runoff. A berm will be constructed and maintained such that it is capable of containing precipitation from a one-hundred year flood for that specific region.
5. All above ground tanks located at the facility and containing materials other than fresh water will be bermed to contain one and one-third the volume of the largest tank or all interconnected tanks.

LANDFARM OPERATION

1. Disposal will only occur when an attendant is on duty. The facility will be secured when no attendant is present.
2. All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
3. Soils will be spread on the surface in six inch lifts or less.

4. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
5. Exempt contaminated soils will be placed in the landfarm so that they are physically separate (ie. bermed) from non-exempt contaminated soils. There will be no mixing of exempt and nonexempt soils.
6. Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts and/or removal of the remediated soils.
7. The facility is authorized to accept only:
 - a. Oilfield contaminated solids which are exempt from RCRA Subtitle C regulations. These wastes should be accompanied by a OCD Form C-144 "Generator Certificate of Waste Status" from the generator.
 - b. "Non-hazardous" non-exempt oilfield contaminated solids from OCD permitted facilities on a case-by-case basis after conducting an analysis for hazardous characteristics and receiving OCD approval. The test for hazardous characteristics for a particular waste may be effective for one year from the date of analysis, if the subsequent wastes from the same waste stream are accompanied by a statement from the generator that there has been no change in the processes employed or the chemicals stored/used at the facility generating the waste.
 - c. Other non-oilfield contaminated solids which are RCRA Subtitle C exempt or non-hazardous by characteristic testing, if ordered by the Department of Public Safety on an emergency basis as the waste poses an eminent danger to public health. The wastes should be accompanied by a "Verification of Waste Status" demonstrating the exempt or non-hazardous classification of the solids and signed by the appropriate regulatory agency. OCD approval will be obtained prior to accepting the wastes.
8. At no time will any OCD permitted landfarms accept wastes which are hazardous by either testing or listing.

9. All loads received at the facility will be accompanied by the following:
 - a. A OCD Form C-144 "Generator Certificate of Waste Status" signed by the waste generator or "Verification of Waste Status" issued by the New Mexico Environment Department (NMED) or the appropriate agency from another state for wastes regulated by that agency. The state agency verification is based on specific information on the subject waste submitted by the generator and demonstrating the exempt or non-hazardous classification of the waste.
 - b. The analytical results of Hazardous Waste Characterization for non-exempt waste including corrosivity, reactivity, ignitability, and toxic constituents and a certification that no listed hazardous wastes are contained within the wastes. The samples for these analyses and results will be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures.
 - c. All generators submitting waste to a OCD Permitted 711 Waste Management Facility must include a Naturally Occurring Radioactive Material (NORM) status declaration which is included in the OCD Form C-144 "Generator Certificate of Waste Status". The generator must declare that the waste if not exempted pursuant to 20 NMAC 3.1 subpart 1403, was surveyed for NORM and does not contain a maximum radiation exposure reading or NORM concentrations do not exceed that listed in 20 NMAC 3.1 Subpart 1403.C and D.
10. The transporter of all wastes to the facility will supply a certification that wastes delivered are those wastes received from the generator and that no additional materials have been added.
11. Moisture will be added as necessary to enhance bioremediation and to control blowing dust. There will be no ponding, pooling or run-off of water allowed. Any ponding of precipitation will be removed within seventy-two (72) hours of discovery.
12. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers will only be permitted after prior approval from the OCD. Request for application of microbes will include the location of the area designated for the bio-remediation program, composition of additives, and the method, amount and frequency of application.
13. No free liquids or soils with free liquids will be accepted at the facility.

14. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the generator, 2) the origin, 3) date received, 4) quantity, 5) certification of exempt status or analysis for hazardous constituents if non-exempt, 6) transporter, and 7) exact cell location and any addition of microbes, moisture, fertilizers, etc.

TREATMENT ZONE MONITORING

1. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample will be analyzed for total petroleum hydrocarbons (TPH), major cations/anions, volatile aromatic organics (BTEX), and heavy metals using approved EPA methods.
2. A treatment zone not to exceed three (3) feet beneath the landfarm native ground surface will be monitored. A minimum of one random soil sample will be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two (2) to three (3) feet below the native ground surface.
3. The soil samples will be analyzed using approved EPA methods for TPH and BTEX quarterly, and for major cations/anions and heavy metals annually.
4. After obtaining the soil samples the boreholes will be filled with an impermeable material such as cement or bentonite.

REPORTING

1. Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe office within thirty (30) days of receipt from the laboratory.
2. The applicant will notify the **OCD Hobbs District office within 24 hours** of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.
3. Authorization from the OCD Santa Fe office will be obtained prior to application of successive lifts and/or removal of the remediated soils.
4. The OCD will be notified prior to the installation of any pipelines or wells within the

boundaries of the facility.

5. The OCD Santa Fe and Hobbs District office will be notified when operation of the facility is discontinued for a period in excess of six (6) months or when the facility is to be dismantled. A closure plan for the facility will be provided.

BOND

1. Pursuant to OCD Rule 711 a surety or cash bond in the amount of **\$125,530**. in a form approved by the Division, is required by C&C Landfarm, Inc. prior to expanding the centralized surface waste management facility. Rule 711.B.3.c. outlines the following schedule:

25% of the total amount be submitted with in two (2) years of the effective date of the Rule or **\$31,382** by **January 1, 1997**;

50% of the total amount be submitted with in two (2) years of the effective date of the Rule or **\$62,765** by **January 1, 1998**;

75% of the total amount be submitted within three (3) years of the effective date of the Rule or **\$94,148** by **January 1, 1999**;

total amount with in four (4) years of the effective date or **\$125,530** by **January 1, 2000**.

CLOSURE

1. The OCD Santa Fe and Hobbs District office will be notified when operation of the facility is discontinued for a period in excess of six (6) months or when the facility is to be dismantled. Upon cessation of landfarming operations for six (6) consecutive months, the operator shall complete cleanup of constructed facilities and restoration of the facility site within the following six (6) months, unless an extension of time is granted by the Director.
2. A closure plan for the facility will be provided including the following OCD closure procedures:
 - a. When the facility is to be closed no new material will be accepted;

- b. Existing landfarm soils will be remediated until they meet the OCD standards in effect at the time of closure;
- c. The area will be reseeded with natural grasses and allowed to return to its natural state;
- d. Closure will be pursuant to all OCD requirements in effect at the time of closure, and any other applicable local, state and/or federal regulations.

CERTIFICATION

C&C Landfarm, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. C&C Landfarm, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

C&C LANDFARM, INC.

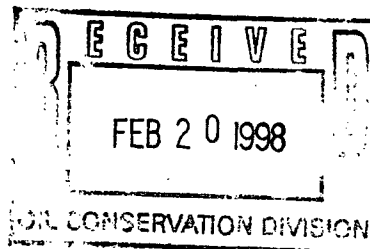
by _____
Title

601 W. ILLINOIS
HOBBS, NEW MEXICO 88240
(505) 392-2236
FAX (505) 392-6949

EDDIE SEAY CONSULTING

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



February 16, 1998

EMNRD - OCD Environmental Bureau
2040 S. Pacheco St.
Santa Fe, NM 87505
ATTN: Martyne J. Kieling

RE: C & C Landfarm Expansion

Dear Ms. Kieling:

Find within additional information concerning C & C's expansion request. Within are additional maps, information and analysis which should help to expedite our application. If you have any questions or need additional information, please call.

Sincerely,

Eddie W. Seay, Agent

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-137
Originated 8/8/95
Revised 6/25/97

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

☐ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other _____
☒ Solids/Landfarm ☐ Treating Plant

2. Operator: C & C Landfarm, Inc.

Address: Box 55 Monument, NM 88265

Contact Person: Eddie W. Seay or Jim Cooper Phone: (505) 392-2236 (505) 397-2045

3. Location: N 1/2 4 NW 1/4 /4 Section 3 Township 20 S. Range 37 E.

Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☐ Yes ☒ No
5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.
6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.
8. Attach a contingency plan for reporting and clean-up for spills or releases.
9. Attach a routine inspection and maintenance plan to ensure permit compliance.
10. Attach a closure plan.
11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.
12. Attach proof that the notice requirements of OCD Rule 711 have been met.
13. Attach a contingency plan in the event of a release of H₂S.
14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.
15. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay Title: Agent

Signature: Eddie W. Seay Date: 2-16-98

CONSTRUCTION OF PROPOSED SITE

The 80 acre site which is proposed will be fenced with a barbed wire fencing material, and a gate entering from the east off of the original landfarm only. A 100 ft. buffer zone will be kept and maintained around the facility. A trench will be cut on the outside of berm at a depth of approximately 2 ft. This trench will divert any fluid (IE rain) from running onto landfarm. The berm will be constructed on the edge of the landfarm around the perimeter and also dividing each cell. The berm will be constructed of ambient material and will be approximately 3 ft. tall and 3 ft. wide. Any fluid which gets into the landfarm will be contained and vacuumed up and disposed of at an approved OCD facility.

- 1) 4 stran barbed wire fence around site.
- 2) 100 ft. buffer zone.
- 3) Trench between berm and buffer zone to divert rainwater.
- 4) 3 x 3 berm and the perimeter and between cells.
- 5) Sid Richardson 4 in. gas pipeline buried 36 in., a 50 ft. buffer zone will be maintained and also the line will be marked and identified.
- 6) Texas-New Mexico 6 in. oil line buried 2 ft. is within our buffer zone area, and will not be bothered except the line will be marked and identified.
- 7) No cell larger than 5 acres and no landfarming on any pipeline.

BERMS AND TRENCHES

During May 1992, Lea Co. did have its recorded 100 year flood. We received ten inches of rain in less than 24 hours. At this time, we had in place the trenches and berms around our existing facility. During this time, no water ran onto the farm area, it all diverted around to the west. An inspection was made by OCD representative, Chris Eustice, ten days following the flood. A report containing this information is within our original file. We feel this system is adequate to use on the new 80 acre site since it has been tested. This berming will also contain any rainfalls which gather inside landfarm so it can be vacuumed up and disposed at an OCD approved facility.

- 7A(1) C & C will add water and do additional disking of the soil to prevent blowing and with the disking and mix of water will aerate the soil and minimize odors.

Berms are inspected on a regular basis and repaired as needed. Inspections are made on at least a weekly schedule because not only wind and rain erode the berms, but trucks and equipment also.

- ✓ 7A(2) Quarterly sampling of the treatment zone will be conducted to detect any leaking from the landfarm cells. with sampling, testing and reporting as OCD requires.

- ✓ 8. Estimated closure cost attached.

No cell will be larger than 5 acres; excluding roads, berms, buffer zones and pipelines, it is estimated that the area to be used for landfarm is approximately 60 acres. Upon approval of permit, a survey will be done and an accurate plat submitted noting size and location.

9. The S & W windmill in question has been mapped and is located between 2800-3000 ft. south of the south edge of the proposed landfarm site. (Map attached) Also, an updated water analysis was conducted on this well, and results are within.

A surface contour map was constructed from information in well files obtained from OCD office, also a USGS contour map is enclosed. The surface slope at the proposed site in Units C & D is to the west. The contours in the general area gradually slopes NW with a 2 ft. high approximately 1/2 mile south of the south edge of the proposed landfarm site, from this point, the slope is to the SE. With the slope of the surface and with the berms which will be constructed 3 ft. high, this should contain any runoff even during a 100 yr. flood, because we have already been tested on the original site. Also contained within this report is a redbed contour map submitted with the original application. The redbed dips NW. (Maps attached)

ESTIMATED CLOSURE PLAN COST
C & C LANDFARM EXPANSION 80 ACRES

Quarterly Analysis for 2 yrs. on 12 five acre cells.

Laboratory prices:

BTEX	\$ 40.00 X 8 quarters X 12 cells =	\$ 3,840.00
TPH	\$ 50.00 X 8 quarters X 12 cells =	4,800.00
Metals	\$200.00 X 2 years X 12 cells =	4,800.00

Analysis Totals \$13,440.00

Quarterly sampling time and labor for 12 cells.

The local laboratory, Cardinal Laboratories, will collect the samples and send you a report provided they get the analytical work. This only seems reasonable since they are local.

Disking/Tilling for 2 years every 2 weeks for 63 acres.

Prices and time quotes from different companies.

Tractor and disk with operator = \$35.00 per hour.

5 to 7 acres per hr.

63 acres would take 12.5 hrs. X 52 wks. = 655.2 hrs.

655.2 X \$35.00 = \$22,932.00

Water for Bioremediation.

Water truck \$1.00 per barrel delivered.

\$120.00 per load

\$120.00 X 10 loads X 12 events = \$14,400.00 for water.

Leveling and contouring landfarm.

Price and time quotes from operators.

D-8 cat dozer - \$75.00 per hr.

1 acre per 30 min.

\$75.00 X 30 min. X 80 acres = \$3000.00 for leveling.

Revegetation for 80 acres.

Equipment and labor.

Tractor w/drill \$30.00 per hr. @ 15 min per acre.

80 acres X 15 min. per acre X \$30.00 = \$600.00

Material cost.

Seed \$10.00 per lb. at 5# per acre X 80 acres = \$4000.00

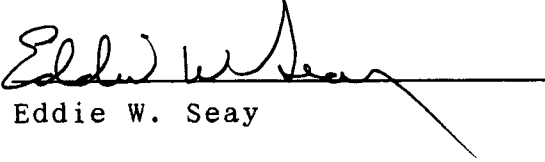
Total = \$4,600.00 for seed and revegetation

Total estimated closure for 80 acres = \$58,373.00

Total estimated closure for expansion and existing landfarm =
\$116,746.00

Keep in mind that as time passes, cells would have become remediated and no disking or other work will need to be done. so the cost will be much cheaper.

I certify that I am authorized to make this application for C & C Landfarm, Inc., and that this application was prepared by me or under my supervision and direction and the date and facts stated herein are true, correct and complete to the best of my knowledge, and I will abide by all the rules set forth by the OCD and the written requirements in attachment 3.


Eddie W. Seay

Agent

Date 2/17/98


Jimmie T. Cooper

Operator

Date 2-17-98

2' 19001

County Rd 59

0 Dry
water wells

0 Dry
water wells

N
↑

Texas New Mexico Pipeline

UNIT D

40 AC

Divided into 5 ac cells
As needed

Unit C

40 AC

Divided into 5 ac Cells
As needed

Buffer Zone
Buffer Zone

Sid Richardson Pipeline

Trench

Berm

Fence

100 ft Buffer
Zone

Entrance
from old
landowner

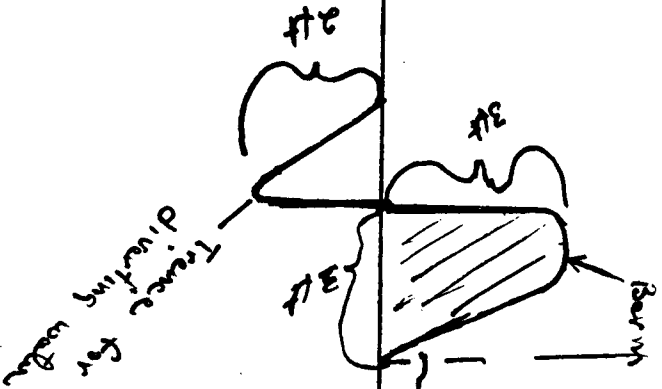
Cross Section

100 ft
Buffer Zone

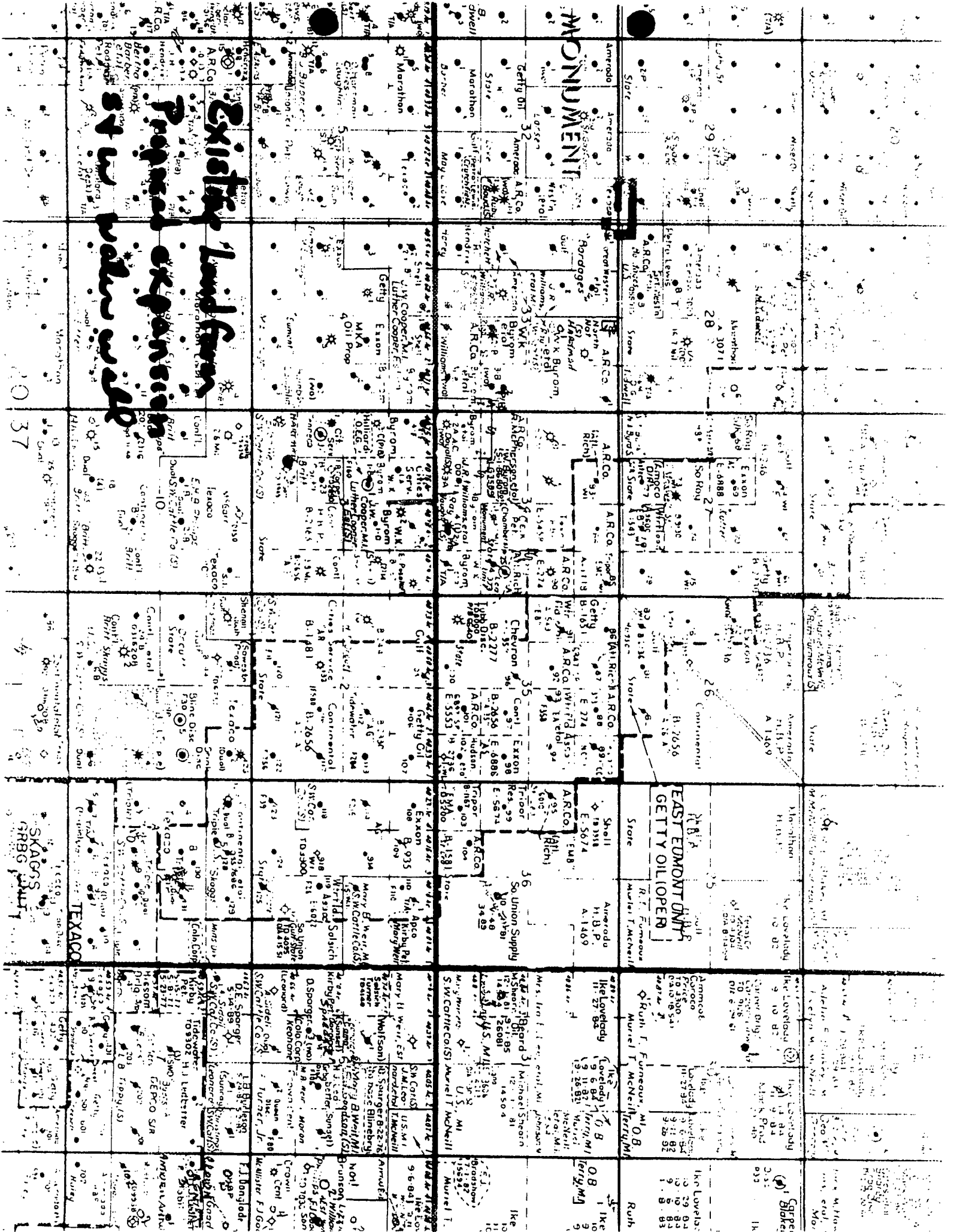


Recess

3 ft treatment zone
for monitoring



1 treatment zone
3 ft



MONUMENT

EXISTING LAND OWNERS

20

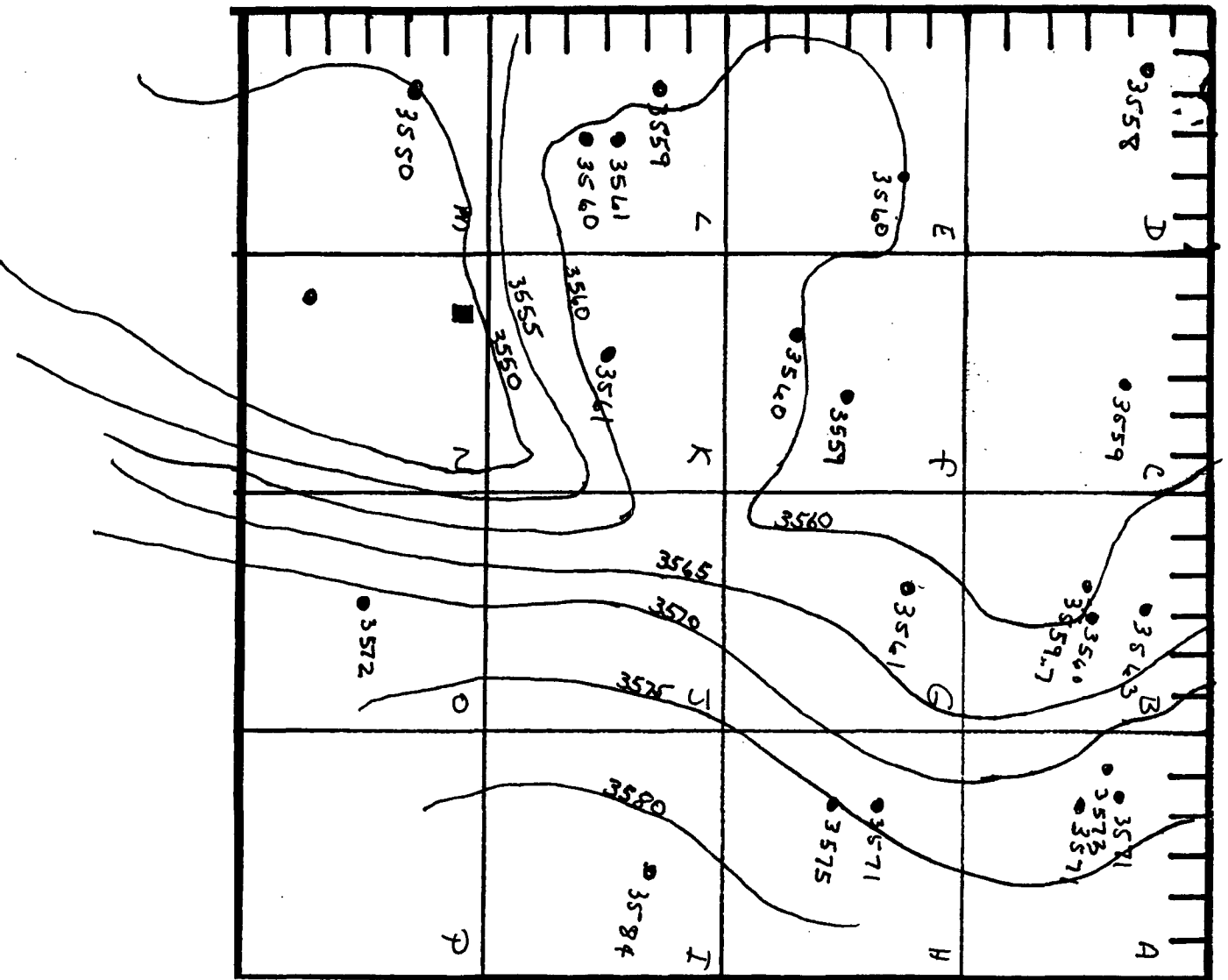
37

EAST MOUNTAIN GETTY OIL OPER

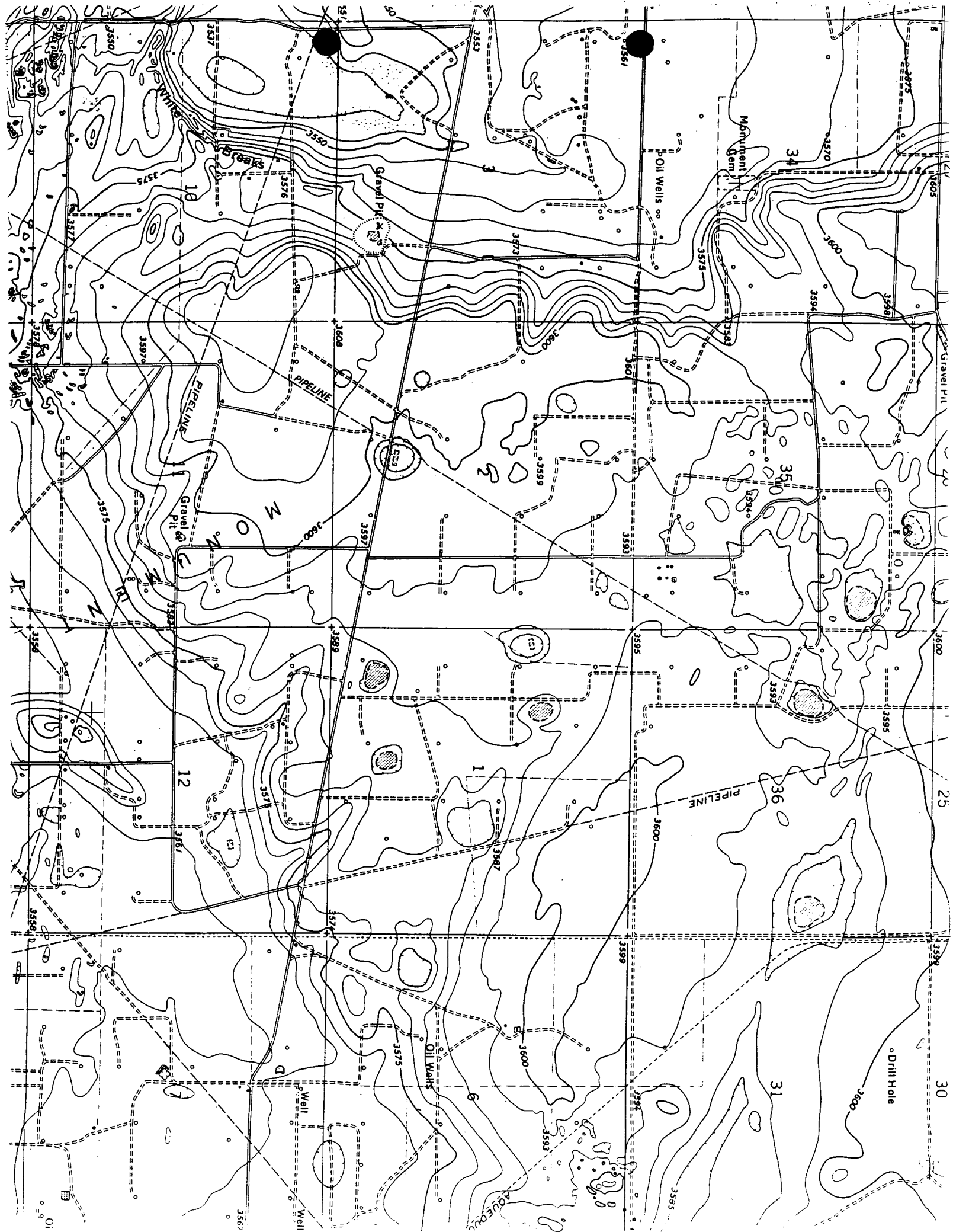
SKAGGS GRB

TEXACO

3-20-37
hea Co.



Proposed landfarm expansion
 Surface contours taken from well information OCB





PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

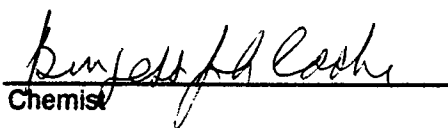
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

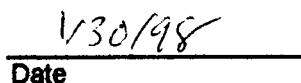
ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88240
FAX TO:

Receiving Date: 01/29/98
Reporting Date: 01/30/98
Project Number: C&C
Project Name: COOPER-SW WINDMILL
Project Location: MONUMENT, NM

Sampling Date: 01/28/98
Sample Type: GROUNDWATER
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	TPH (mg/L)	CI (mg/L)
ANALYSIS DATE:		01/30/98	01/30/98
H3429-1	S&W WINDMILL, SECT. 3	<1.0	708
Quality Control		202	472
True Value QC		200	500
% Recovery		101	94.4
Relative Percent Difference		1.4	4.0
METHODS: EPA 600/4-79-020		418.1	325.3


Chemist


Date

ARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603 101 East Marland, Hobbs, NM 88240
(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page of

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+ Cardinal cannot accept verbal changes. Please fax written changes to 915-673-7020.



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88240
FAX TO:

Receiving Date: 02/05/98
Reporting Date: 02/17/98
Project Owner: COOPER
Project Name: C&C LANDFARM
Project Location: MONUMENT, NM

Sampling Date: 02/05/98
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: GP/AH

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		02/16/98	02/06/98	02/11/98	02/12/98	02/12/98	02/12/98	02/10/98	02/06/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3445-1	C&C EXPANSION	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
	BACKGROUND								
Quality Control		0.095	2.358	4.945	2.025	5.026	5.006	0.0087	0.0485
True Value QC		0.100	2.500	5.000	2.000	5.000	5.000	0.0100	0.0500
% Recovery		95	94	99	101	101	100	87	97
Relative Standard Deviation		7.5	0.5	14.6	0.9	1.9	4.7	8.9	10.1
METHODS: EPA 1311, 600/4-91/0									
		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Chemist

Date



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88240
FAX TO:

Receiving Date: 02/05/98
Reporting Date: 02/09/98
Project Owner: COOPER
Project Name: C&C LANDFARM
Project Location: MONUMENT, NM

Sampling Date: 02/05/98
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: AH/BC

LAB NUMBER	SAMPLE ID	Na (mg/Kg)	Ca (mg/Kg)	Mg (mg/Kg)	K (mg/Kg)	Conductivity (u mhos/cm)	T-Alkalinity (mgCaCO ₃ /Kg)
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ANALYSIS DATE:	02/09/98	02/06/98	02/06/98	02/06/98	02/06/98	02/06/98
H3445-1 C&C EXPANSION	72	58	23	16.2	139	192
BACKGROUND						
Quality Control	NR	55	51	NR	1445	NR
True Value QC	NR	50	50	NR	1413	NR
% Accuracy	NR	110	102	NR	102	NR
Relative Percent Difference	NR	9.1	1.9	NR	0.3	NR

METHODS:	SM3500-Ca-D	3500-Mg E	8049	120.1	310.1
----------	-------------	-----------	------	-------	-------

	Cl ⁻ (mg/Kg)	SO ₄ (mg/Kg)	CO ₃ (mg/Kg)	HCO ₃ (mg/Kg)	pH (s.u.)
--	----------------------------	----------------------------	----------------------------	-----------------------------	--------------

ANALYSIS DATE:	02/06/98	02/06/98	02/06/98	02/06/98	02/06/98
H3445-1 C&C EXPANSION	160	<1	0	234	8.11
BACKGROUND					
Quality Control	472	101	NR	NR	6.97
True Value QC	500	100	NR	NR	7.00
% Accuracy	94.4	101	NR	NR	99.6
Relative Percent Difference	4.0	0	NR	NR	0.4

METHODS:	SM4500-Cl-B	375.4	310.1	310.1	150.1
----------	-------------	-------	-------	-------	-------

Burgess J. L. Cash
Chemist

2/9/98
Date



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

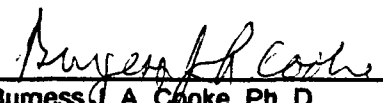
**ANALYTICAL RESULTS FOR
EDDIE SEAY CONSULTING
ATTN: EDDIE SEAY
601 W. ILLINOIS
HOBBS, NM 88240
FAX TO:**

Receiving Date: 02/05/98
Reporting Date: 02/06/98
Project Owner: COOPER
Project Name: C&C LANDFARM
Project Location: MONUMENT, NM

Sampling Date: 02/05/98
Sample Type: SOIL
Sample Condition: COOL & INTACT
Sample Received By: AH
Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/Kg)	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE:		02/06/98	02/05/98	02/05/98	02/05/98	02/05/98
H3445-1	C&C EXPANSION	<10	<0.020	<0.020	<0.020	<0.060
	BACKGROUND					
Quality Control		203	0.102	0.104	0.102	0.306
True Value QC		200	0.100	0.100	0.100	0.300
% Recovery		102	102	104	102	102
Relative Percent Difference		3.6	2.7	2.2	1.4	0.9

METHODS: TRPHC - EPA 600/7-79-020, 418.1; BTEX - EPA SW-846-8260


Burgess A. Cooke, Ph. D.

2/6/98
Date

ARDINAL LABORATORIES, INC.

2111 Beechwood, Abilene, TX 79603

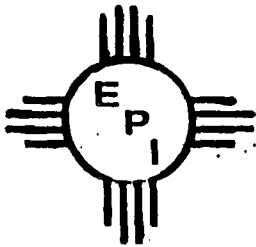
101 East Marland, Hobbs, NM 88240

(915) 673-7001 Fax (915) 673-7020 (505) 393-2326 Fax (505) 393-2476

Page of

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



ENVIRONMENTAL PLUS, INC.

STATE APPROVED LAND FARM

PHONE (505)394-3481

P.O. BOX 969

EUNICE, NEW MEXICO 88231

FOREMAN-----	\$22.00 PER HR
OPERATOR-----	\$20.00 PER HR
LABOR-----	\$13.00 PER HR
TRUCK DRIVER-----	\$17.00 PER HR
TRUCK W/TANDEM FLOAT-----	\$35.00 PER HR
TRUCK W/LOW BOY-----	\$48.00 PER HR
PICKUP-----	\$11.00 PER HR
6 YARD DUMP TRUCK-----	\$23.00 PER HR
12 YARD DUMP TRUCK-----	\$30.00 PER HR
410 JOHN DEERE BACKHOE/LOADER-----	\$25.00 PER HR
690 JOHN DEERE TRACKHOE-----	\$75.00 PER HR
790 JOHN DEERE TRACKHOE-----	\$85.00 PER HR
920 CAT LOADER-----	\$35.00 PER HR
966 CAT LOADER-----	\$50.00 PER HR
850 JOHN DEERE W/RIPPER-----	\$60.00 PER HR
2390 CASE FARM TRACTOR W/24" OFFSET DISC-DRILL-----	\$52.00 PER HR
FORD OR COBOTA W/DISC - TILLER - OR BRUSH HOG MOWER-----	\$35.00 PER HR

CONTAMINATED SOIL (IN)-----	\$23.00 PER YD
FILL DIRT (OUT)-----	\$ 3.00 PER YD
CALICHE (OUT)-----	\$ 2.50 PER YD

ENVIRONMENTAL PLUS, INC.

BY _____

MID-TEX CONSTRUCTION COMPANY

P.O. BOX 3047

ODESSA, TX 79760

915-381-2710 OR 1-800-331-6326

STANDARD EQUIPMENT AND LABOR RATES

<u>UNIT</u>	<u>COST PER HOUR</u>
D-5 Dozer	\$65.00
D-6 Dozer	75.00
D-6R Dozer	85.00
D-7 Dozer w/ripper	100.00
120-G Motor Grader	55.00
130-G Motor Grader	57.00
963 Track Loader	80.00
950 Rubber Tired Loader	75.00
613 Elevating Scraper - 12 cy	80.00
623 Elevating Scraper - 23 cy	135.00
410 Rubber Tired Backhoe	45.00
12 cy Dump Truck	47.00
24 cy Dump Truck	75.00
790 Trackhoe - 55000	125.00
60 BBL Water Truck	42.00
100 BBL Water Truck	47.00 ←
Grid Roller (Log Pull Tractor)	40.00
Vibratory Roller	45.00
175 Compressor	55.00
Shooter	30.00
Drill Operator	20.00
Haul Truck w/lowboy	65.00
4 Wheel Drive Pickup	20.00
2 Wheel Drive Pickup	15.00
Tractor w/disc	40.00 ←
Project Manager	30.00
Superintendent or Foreman	25.00
Operator/Pusher	22.00
Laborer	20.00
2 Ton Gang Truck	25.00
1/2 or 3/4 Ton Pickup w/Tools	20.00

B & H MAINTENANCE & CONSTRUCTION, INC.

PIPELINE AND PLANT CONSTRUCTION
ENVIRONMENTAL AND REMEDIATION SERVICES

505 394-2588
1-800-782-5901
FAX 505 394-2299
P.O. BOX 970
EUNICE, NM 88231

505 887-9755
887-7931
FAX 505 887-0369
P.O. BOX 98
CARLSBAD, NM 88220

915 550-8210
FAX 915 368-4031
2858 STEVEN ROAD
WEST LOOP 338
ODESSA, TX 79769

HOURLY EQUIPMENT RATES (continued)

850 COMBINATION TRACTOR -----	> \$ 42.00 PER HR
D4 COMBINATION TRACTOR -----	> \$ 34.00 PER HR
561 COMBINATION TRACTOR -----	> \$ 42.00 PER HR
D4 TACK RIG -----	> \$ 79.00 PER HR
D6B CAT DOZER -----	> \$ 39.00 PER HR
D6D CAT DOZER -----	> \$ 46.00 PER HR
D7 CAT DOZER -----	> \$ 50.00 PER HR
D8 CAT DOZER -----	> \$ 75.00 PER HR
D7 CAT W/AUGER BACKFILLER -----	> \$100.00 PER HR
EZ7 PADDING MACHINE -----	> \$100.00 PER HR
920 CAT LOADER/FORKLIFT -----	> \$ 33.00 PER HR
966 CAT LOADER/FORKLIFT -----	> \$ 40.00 PER HR
CASE FORKLIFT -----	> \$ 33.00 PER HR
FARM TRACTOR W/SHREDDER OR DRILL -----	> \$ 29.00 PER HR ←
3 INCH TO 8 INCH TAPING MACHINE -----	> \$ 29.00 PER HR
8 INCH TO 12 INCH TAPING MACHINE -----	> \$ 36.00 PER HR
12 INCH TO 16 INCH WRAPSTER -----	> \$ 40.00 PER HR
30 INCH TO 36 INCH WRAPSTER -----	> \$ 50.00 PER HR
2 INCH TO 12 INCH SQUEEZER -----	> \$100.00 PER HR
3 BARREL DOPE POT -----	> \$ 12.00 PER HR
10 BARREL DOPE POT -----	> \$ 22.00 PER HR
SANDBLASTING EQUIPMENT -----	> \$ 26.00 PER HR
PORTABLE PAINT RIG -----	> \$ 14.00 PER HR
TANDEM PIPE TRAILER -----	> \$ 9.00 PER HR
UTILITY TRAILER -----	> \$ 9.00 PER HR
PIPE STRAIGHTENING MACHINE -----	> \$ 20.00 PER HR
BORING MACHINE W/ WATER TRUCK -----	> \$120.00 PER HR
TWIN DRILL OR AIR TRACK -----	> \$ 60.00 PER HR
PAVEMENT BREAKER OR HAND DRILL -----	> \$ 9.00 PER HR
PORTABLE HAND GRINDER -----	> \$ 4.50 PER HR

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

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Environmental Bureau
Oil Conservation Division

Form C-137
Originated 8/8/95
Revised 6/25/97

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other _____

☒ Solids/Landfarm ☐ Treating Plant

2. Operator: C & C Landfarm, Inc.

Address: Box 55, Monument, NM 88265

Contact Person: Eddie W. Seay Phone: (505) 392-2236

3. Location: W 1/2 ~~NE~~ NE /4 Section 3 Township 20 Range 37
Submit large scale topographic map showing exact location complete location attached.

4. Is this a modification of an existing facility? ☐ Yes ☒ No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

8. Attach a contingency plan for reporting and clean-up for spills or releases.

9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

12. Attach proof that the notice requirements of OCD Rule 711 have been met.

13. Attach a contingency plan in the event of a release of H₂S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay

Title: Agent

Signature: Eddie W. Seay

Date: 9-1-97

(5)

List of names and addresses of record of all landowners
within 1 mile of the proposed expansion.

SW Cattle Co.
P.O. Box 549
Hobbs, NM 88241

Coy R. Doyal
Box 188
Monument, NM 88265

Jimmy B. Cooper
P.O. Box 36
Monument, NM 88265

Carlyle J. Hall
P.O. Box 163
Monument, NM 88265

Joe R. Williams
Box 215
Monument, NM 88265

Jimmy T. Cooper
Box 55
Monument, NM 88265

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

Witt V. Laughlin, Est.
Elsie Reeves
P.O. Box 90706
White Mountain Lake, AZ 85912

Velton O. Setzler
P.O. Box 205
Monument, NM 88265

Roger Villalobos
913 Sayers Dr.
Hobbs, NM 88241

Village of Monument
Monument, NM 88265

List of names & addresses continued:

Arthur Travis Schwertfeger Family Trust
413 West Blanco Dr.
Hobbs, NM 88241

Dorotea Cadena
Box 244
Eunice, NM 88231

Larry or Patsy Hunt
P.O. Box 208
Monument, NM 88265

Robert L. Rodgers, Jr.
Star Rt. A, Box 51
Monument, NM 88265

Sarah Phillips
1323 E. Central
Amarillo, TX 79108

Carolyn J. Taylor
7411 Valdez
Hobbs, NM 88241

Glyn Mark Stone
P.O. Box 20
Monument, NM 88265

INFORMATION

The location of the site is the W 1/2 of the NE 1/4 of Section 3, Township 20 S., Range 37 E., Lea County, New Mexico. The site covers 80 acres in Unit B & G.

- (D) The 80 acre site in use at this time contains the following:
- 1) 4 strain barbed fence around the site.
 - 2) Buffer zone around the perimeter.
 - 3) Berm and trench around site to direct runoff and runoff.
 - 4) Gates with locks.
- (Diagram of facility within)
- (E) Only exempt oil and gas waste will be accepted at the landfarm unless special approval by OCD environmentalist. The material accepted will have documentation as to where, what company, who delivered it and signed by an authorized company person. Also, C & C will require analysis of the material before accepting it.

The material will be hauled in by truck, spread into six inch lifts and disked every other week.

Each cell's treatment zone will be tested on a quarterly basis for BTEX, TPH and for metals yearly, with analysis and report sent to Santa Fe OCD.

- (F) C & C will adhere to OCD Rule 116.
- 1) Report any accidental discharge by phone immediately.
 - 2) Clean up and/or remediate according to OCD policy.
 - 3) File written reports as necessary.
- (G) Personnel will be on location at all times when material is being hauled. Gates will be kept locked and secured. Any water that accumulates on the property from rain will be vacuumed and hauled. Water may be added to landfarm from time to time for dust control and to enhance remediation.
- (H) An open system such as a landfarm, should not have an H₂S problem. If H₂S becomes a problem, proper testing and notice will be conducted.

(I) Once C & C has stopped operations, it is estimated it will take approximately two years to finish remediating what soil is left in landfarm.

- 1) Quarterly analysis for two years.
BTEX, TPH and Metals Cost: \$ 1,600.00
- 2) Disk and tilling for two years every
other week. We presently contract
this at a cost of \$8,000.00 per year,
For two years Cost: \$16,000.00
- 3) After area has been remediated,
to level area and seed will
approximately Cost: \$ 900.00

Total Closure Cost: \$18,500.00

- 4) We currently have in place a \$25,000.00 bond.

Fence

Unit B

Gat

N ↑

Cell F

well site

well site

Cell E

Road

Caliche Pit

Fence

County Rd 58

Unit G

Amerada well site

Cell C

Cell B

Cell D

Cell A

Caliche Pit will be cell G

Caliche Pit

Drain System

Gat

Fence

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131
RECEIVED
AUG 12 1997
Environmental Bureau
Oil Conservation Division

Form C-137
Originated 8/8/95
Revised 6/25/97

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Submit large scale topographic map showing exact location

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5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

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Signature: Eddie W. Seay Date: 8-8-97

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7411 Valdez
Hobbs, NM 88241

Glyn Mark Stone
P.O. Box 20
Monument, NM 88265

Existing Land farm

Entrance from land farm

N ↑

○ Dry water wells

County Rd 58

UNIT C
40 AC

Divided into 5 AC Cells
as needed.

UNIT D
40 AC

Divided into 5 AC Cells
as needed.

Sid Richardson Pipeline

Fence

Buffer Zone

Berm

Trench

CONSTRUCTION OF PROPOSED SITE

The 80 acre site which is proposed, will be fenced with a barbed wire fence with an entrance from the existing landfarm only. A buffer zone will be kept around facility to divert any runoff from adjacent properties. A berm inside the trench will be maintained as a secondary precaution to prevent runoff or runoff of facility. All cells will be disked and monitored and no cell will be built on an existing pipeline. There will be no buildings or storage of any kind on the facility and only waste approved by OCD will be admitted.

- 1) 4 strand barbed fence around site.
- 2) Buffer zone.
- 3) Trench - between berm and buffer zone.
- 4) Berm around the perimeter.
- 5) Sid Richardson Pipeline 4 in. gas line buried 36 in.
- 6) Texas-New Mexico Pipeline 6 in. oil line buried 2 ft.
- 7) Access from other landfarm only.
- 8) Proposed cells not to exceed 5 acres. All cells will be kept off pipeline.

INFORMATION

- (E) Only exempt oil and gas waste will be accepted at the landfarm unless special approval by OCD environmentalist. The material accepted will have documentation as to where, what company, who delivered it and signed by an authorized company person, also C & C will also require analysis of the material before accepting it.

The material will be hauled in by truck, spread into six inch lifts and disked every other week.

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- 1) Quarterly analysis for two years.
BTEX, TPH and Metals Cost: \$ 1,600.00
 - 2) Disk and tilling for two years every other week. We presently contract this on our existing 80 acres at a cost of \$8,000.00 per year, for two years Cost: \$16,000.00
 - 3) After area has been remediated, to level area and seed will approximately Cost: \$ 900.00

Total Closure Cost: \$18,500.00

HYDROLOGY AND GEOLOGY OF PROPOSED SITE

Geographically, the site is situated near the western boundary of the southern extension of the High Plains in southeastern New Mexico. The proposed site is an 80 acre tract located in Unit C & D, Sect. 3, T. 20 S., R. 37 E., Lea Co., NM. The site is adjacent to the existing C & C Landfarm which is permitted by the OCD. The site, which is bordered by County Road 58 to the north, has a gradual surface slope to the west. The site is situated below the white breaks or caprock area where little or no water is found. Research of State Engineer records and USGS files show no fresh water was recorded or found within the area of review. Three water wells were drilled in Sect. 34 adjacent to the proposed site. All wells, drilled by Van Noy Drilling, were recorded as dry holes with redbeds at 29 ft. (Logs attached) The redbed in this area range in thickness from 600 to 1000 ft. from logs of oil wells in the area. (Attached)

The only water wells within the area are a windmill approximately 1 mile south of the site, and a water well 3/4 mile northwest of site. A copy of a recent analysis is within. These wells were not listed on State Engineer's list of water wells.

For the past several years that C & C has been permitted to operate and monitor its existing facility, no water has been found in the monitor wells or the caliche pits, which are excavated down to top of redbeds, and we have found no water on the proposed site. I feel that without the presence of water and the preventive measures of the trench and berms to prevent runoff and runoff of water, and the constant and consistent monitoring of the treatment zone below the proposed site and the existing facility, this should be a safe site for the disposal and remediation of oilfield contaminated soils.

	LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	BASIN FILE
2	20S 36E 09 13440	10/12/84	434	2350	63F	TOG	L
5	20S 36E 10 32114	08/28/72	79	520		GAL	L
6	20S 36E 10 32114	11/01/76	66	889	66F	GAL	L
7	20S 36E 10 32114	10/19/79	68	880	66F	GAL	L
8	20S 36E 10 32114	10/12/84	92	980	64F	GAL	L
10	20S 36E 11 42243	08/28/72	1000	1450		GAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	GAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	GAL	L
13	20S 36E 11 42243	10/12/84	840	4330	64F	GAL	L
15	20S 36E 15 242421	08/28/72	720	1800		GAL	L
16	20S 36E 15 242421	11/01/76	518	3223		GAL	L
17	20S 36E 15 242421	10/12/84	882	3630	63F	GAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	GAL	L
20	20S 36E 15 24342	03/30/54	1080	6780		TOG	L
21	20S 36E 15 24342	09/09/58	1240	7500		TOG	L
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
26	20S 36E 26 24344	11/08/79	150	1790		TOG	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	TOG	L
29	20S 36E 26 24443	11/08/79	182	1895		TOG	L
31	20S 36E 35 24444	11/08/79	118	1541		TOG	L
33	20S 37E 04 11114	04/02/54	450	2180		GAL	L
34	20S 37E 04 11114	04/22/55	425	2090		GAL	L
35	20S 37E 04 11114	09/09/58	325	1670		GAL	L
37	20S 37E 04 221321	04/22/55	51	758		GAL	L
38	20S 37E 04 221321	09/09/58	47	708		GAL	L
39	20S 37E 04 221321	07/14/77	106	1070		GAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	GAL	L
41	20S 37E 04 221321	2/06/85	81	964		GAL	L
43	20S 37E 05 222144	11/29/79	258	1611		TOG	L
44	20S 37E 05 222144	9/26/84	314	1729		TOG	L
46	20S 37E 07 24331	11/09/79	1268	4232		TOG	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	TOG	L
49	20S 37E 08 244124	11/29/79	868	3734	57F	TOG	L 07620 ES
51	20S 37E 08 423223	10/25/79	520	2396	66F	TOG	L
52	20S 37E 08 423223	9/26/84	886	3806		TOG	L

1/09/19	USG	DOM	19S.37E.04.111444	3692.00	32	0	0	62	PLUC	U		
1/07/22	OCC	IRR	19S.37E.04.11333	3692.00 DP	350	0	0	0		P	25-12260	0
3/09/08	SEO	IRR	19S.37E.04.11333	3692.00 DP	35	670	0	68	0877		25-12260	0
1/09/22	SEO	IRR	19S.37E.04.11333	3692.00 DP	91	907	0	66	0877		25-12260	0
7/07/13	SEO	IRR	19S.37E.04.11333	3692.00 DP	30	630	0	0	0777		25-12260	0
4/09/19	SEO	IRR	19S.37E.04.11333	3692.00 DP	28	563	0	67	1084		25-12260	0
0/06/14	SEO	IRR	19S.37E.04.11333	3692.00 DP	71	565	0	0	1190		25-12260	0
9/10/17	SEO	IRR	19S.37E.04.411122	3974.00 DP	34	607	0	66				0
4/09/19	SEO	IRR	19S.37E.04.411122	3974.00 DP	42	649	0	65	1084			0
0/11/21	OCC	STK	19S.37E.04.41200	3672.00 DP	195	0	0	0		P	25-12262	0
0/11/22	OCC	DOM	19S.37E.04.412231	3672.00 YT	37	0	0	0		P	25-12263	0
6/12/21	SEO	STK	19S.37E.04.412231	3672.00 DP	80	1114	0	63			25-12263	0
7/06/17	SEO	DOM	19S.37E.04.412231	3672.00 YT	88	1161	0	0	0677		25-12263	0
9/10/19	SEO	STK	19S.37E.04.412231	3672.00 DP	48	746	0	65	0683		25-12263	0
4/09/26	SEO	STK	19S.37E.04.412231	3672.00 DP	65	903	0	64	0586		25-12263	0
9/10/24	SEO	STK	19S.37E.08.31111	3698.00 DP	48	731	0	65			25-12267	0
9/10/19	SEO	STK	19S.37E.16.233212	3650.00 DP	44	680	0	0			25-12274	0
4/11/08	SEO	STK	19S.37E.16.233212	3650.00 DP	34	610	0	65	1284		25-12274	0
0/06/14	SEO	STK	19S.37E.16.233212	3650.00 DP	75	611	0	65	1190		25-12274	0
9/10/19	SEO	STK	19S.37E.17.43143	3665.00 DP	46	688	0	66			25-12276	0
4/09/26	SEO	STK	19S.37E.17.43143	3665.00 DP	78	797	0	64	1184		25-12276	0
9/10/24	SEO	STK	19S.37E.19.113211	3703.00 DP	62	728	0	69			25-12278	0
4/11/08	SEO	STK	19S.37E.19.113211	3703.00 DP	45	661	0	0	1284		25-12278	0
0/06/14	SEO	STK	19S.37E.19.42222	3642.00 DP	225	1140	0	65	1190			0
9/10/24	SEO	STK	19S.37E.20.23122	3677.00 DP	116	968	0	68			25-12279	0
9/11/07	SEO	STK	19S.37E.23.334133	3615.00 DP	86	1027	0	62			25-12281	0
4/11/07	SEO	STK	19S.37E.23.334133	3615.00 DP	61	777	0	67	1284		25-12281	0
0/06/19	SEO	STK	19S.37E.23.334133	3615.00 DP	85	937	0	63	1190		25-12281	0
4/09/26	SEO	DOM	19S.37E.28.42421	3586.00 YT	60	757	0	0	1184			0
0/06/19	SEO	DOM	19S.37E.28.42421	3586.00 YT	65	716	0	0	1190			0
9/11/29	SEO	STK	19S.37E.28.42422	3584.00 DP	58	733	0	0	0683		25-12282	0
4/07/15	USG	MTU	19S.37E.29.43143	3589.00 YT	91	665	0	75		U		0
58/09/09	SEO	MTU	19S.37E.29.43143	3589.00 YT	73	678	0	0		U		0
9/11/29	SEO	DOM	19S.37E.30.444123	3594.00 YT	88	947	0	0				0
4/09/26	SEO	DOM	19S.37E.30.444123	3594.00 YP	151	1001	0	0	1184			0
0/06/14	SEO	DOM	19S.37E.30.444123	3594.00 DP	115	935	0	0	1190			0
9/10/25	SEO	DOM	19S.37E.32.31440	3569.00 DP	224	1582	0	78			25-12898	0
9/10/25	SEO	DOM	19S.37E.32.411343	3570.00 YT	260	1601	0	0				0
4/11/07	SEO	DOM	19S.37E.32.411343	3570.00 YT	134	1057	0	0	1284			0
9/10/25	SEO	IRR	19S.37E.32.41322	3567.00 DP	226	1427	0	0				0
4/09/20	SEO	IRR	19S.37E.32.41322	3567.00 DP	235	1593	0	0	1084			0
9/11/29	SEO	DOM	19S.37E.34.112412	3576.00 YT	60	731	0	0				0
4/09/26	SEO	DOM	19S.37E.34.112412	3576.00 YT	49	700	0	0	1284			0
4/11/07	SEO	DOM	19S.37E.34.112412	3576.00 YT	59	725	0	0	1284			0
9/10/11	SEO	IRR	19S.37E.34.334322	3563.00 DP	94	1038	0	67				0
9/10/17	SEO	IRR	19S.38E.01.314242	3607.00 SPRKLR	240	1866	0	0				0
53/05/29	USG	MUN	19S.38E.02.13321	0.00	80	849	0	0	PLUG	U		0
57/08/14	SEO		19S.38E.03.13133	0.00 YT	80	0	0	0				0
57/08/14	SEO	DOM	19S.38E.04.112243	0.00 DP	88	0	0	0				0
57/08/14	SEO	DOM	19S.38E.04.12124	0.00 DP	104	0	0	0				0
57/08/13	SEO	PPP	19S.38E.04.12414	0.00 DP	327	0	0	0	ABDN			0
57/08/12	SEO	DOM	19S.38E.04.243321	3612.00 YT	40	0	0	0				0
9/10/18	SEO	DOM	19S.38E.04.243321	3612.00 YT	90	816	0	65				0
9/10/18	SEO	DOM	19S.38E.04.243323	3612.00 YT	28	655	0	66				0
57/08/14	SEO	DOM	19S.38E.04.243323	3612.00 YT	64	0	0	0				0
76/11/23	SEO	DOM	19S.38E.04.243323	3612.00 YT	59	720	0	0				0
85/02/14	SEO	NOT	19S.38E.04.243323	3612.00 YT	120	1030	0	0	0385			0
75/03/17	ONR	DOM	19S.38E.04.24333	0.00 YT	46	610	0	0		0		0
57/08/14	SEO	DOM	19S.38E.04.244443	3613.00 YT	48	0	0	0				0
76/11/23	SEO	DOM	19S.38E.04.244443	3613.00 YT	78	774	0	0				0

P L A I N S

H

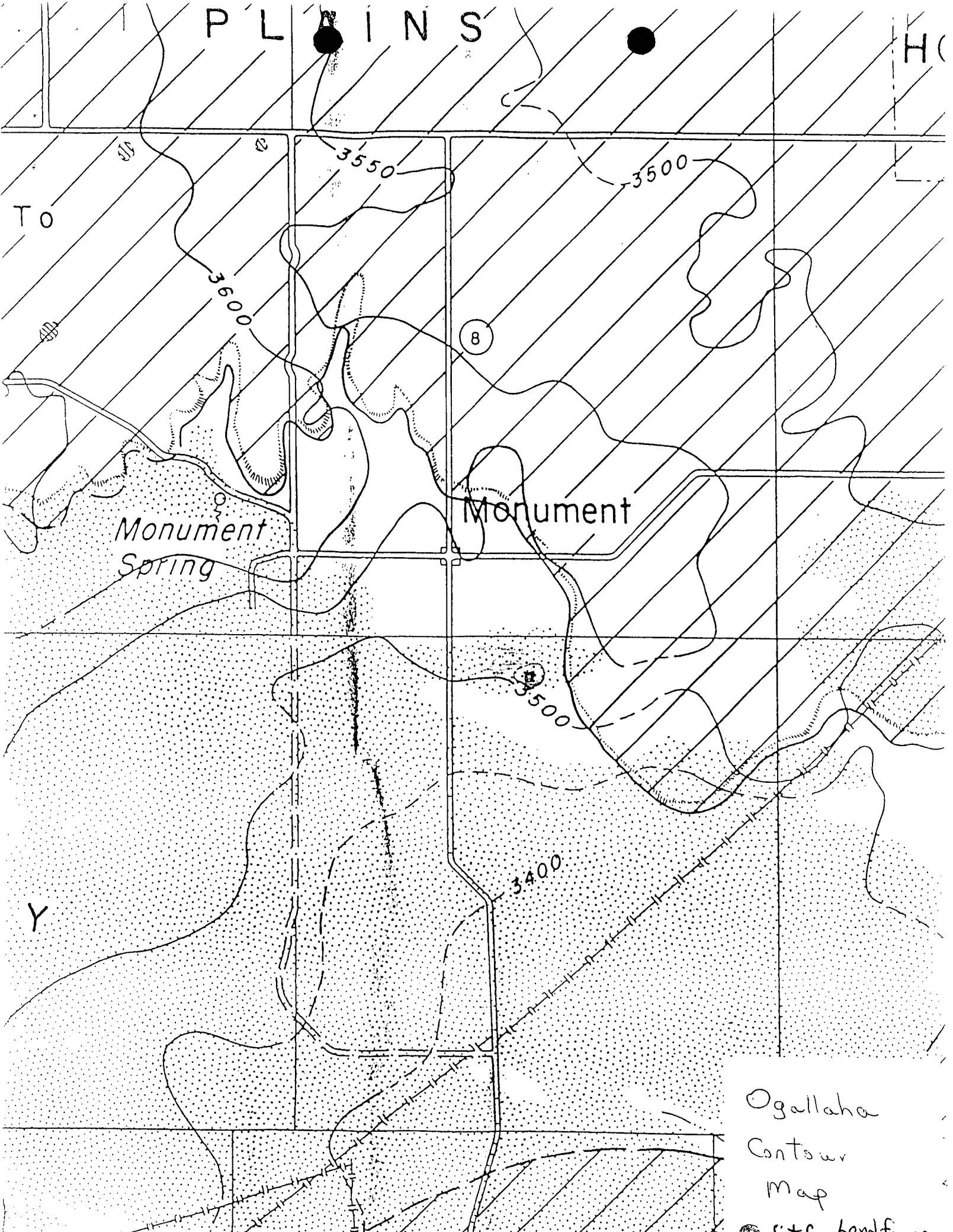
To

Monument
Spring

Monument

Y

Ogallala
Contour
Map
● c+c landform



STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Carlyle J. Hall Owner's Well No. 01
 Street or Post Office Address P.O. Box 163
 City and State Monument, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

- SE1
 a. $\frac{1}{4}$ SW $\frac{1}{4}$ SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 34 Township 19S 50. Range 37 East N.M.P.M.
E1320', S330", W 1320', beginning, 10 ac
 b. Tract No. _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208

Address Box 7, Oil Center, NM 88266

Drilling Began 2-25-91 Completed 2-26-91 Type tools Cable Size of hole 8" in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well dry ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>dry</u>				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>None</u>								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 17, 1992

Quad _____ FWL _____ FSL _____

File No. L-10,166 (1) (DRY HOLE)

Use DOM & STK

Location No. 19.37.34.3441

#1 19.37.34.3441

[illegible][illegible]

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired, or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Carlyle J. Hall Owner's Well No. 02
 Street or Post Office Address Box 163
 City and State Monument, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

a. SE 1/4 XXXX SE 1/4 SW 1/4 of Section 34 Township 19 S Range 37 E N.M.P.M.
E 1320, S 330', W 1320', beginning, 10ac
 b. Tract No. _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. VAN NOY License No. WD-208

Address P. O. BOX 7, OIL CENTER, NM 88266

Drilling Began 2-26-91 Completed 2-27-91 Type tools Cable Size of hole 8 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well DRY ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
DRY				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
NONE								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received **March 17, 1992**

Quad _____ FWL _____ FSL _____

File No. L-10,166 (2) (DRY HOLE) Use DOM & STK Location No. 19.37.34.3441

[illegible]

W. L. Van Noy
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well CARLYLE J. HALL Owner's Well No. 03
 Street or Post Office Address BOX 163
 City and State MONUMENT, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

- a. SE 1/4 ~~SW 1/4~~ SE 1/4 SW 1/4 of Section 34 Township 19S Range 37E N.M.P.M.
e 1320, s 330', w 1320' beginning, 10 ac
- b. Tract No. _____ of Map No. _____ of the _____
- c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
- d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. VAN NOY License No. WD-208

Address BOX 7, OIL CENTER, NM 88266

Drilling Began 1-29-92 ~~3-29-91~~ Completed 1-30-92 Type tools Cable Size of hole 8 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well DRY ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
DRY				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
NONE								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 17, 1992

Quad _____ FWL _____ FSL _____

File No. L-10,166 (03) (DRY HOLE) Use DOM & STK Location No. 19.37.34.3441

ESD

#3 19.37.34.3441

[illegible]

68-10397

W. R. Van Noy
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

**STATE ENGINEER OFFICE
WELL RECORD**

FIELD ENGR. LOG

Section 1. GENERAL INFORMATION

(A) Owner of well Joe Williams Owner's Well No. _____
 Street or Post Office Address 1330 Cenfial
 City and State Alb. N. M., 87105

Well was drilled under Permit No. L-7513-S and is located in the:

a. SW $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 34 Township 19S Range 37E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in the _____ Grant.

(B) Drilling Contractor G. D. Oldaker, License No. WD-657

Address P. O. Box 2321, Hobbs, New Mexico, 88240

Drilling Began 12/15/79 Completed 12/ 17/79 Type tools rotary Size of hole 10 $\frac{1}{2}$ in.

Elevation of land surface or 3650 at well is 3650 ft. Total depth of well 44 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 25 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>25</u>	<u>44</u>	<u>19</u>	<u>Water, Sand</u>	<u>25 GPM</u>

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>6 5/8</u>			<u>0</u>	<u>44</u>	<u>44</u>	<u>none</u>	<u>25</u>	<u>44</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
		<u>10$\frac{1}{2}$</u>			

Section 5. PLUGGING RECORD

Plugging Contractor _____

Address _____

Plugging Method _____

Date Well Plugged _____

Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
<u>1</u>			
<u>2</u>			
<u>3</u>			
<u>4</u>			

FOR USE OF STATE ENGINEER ONLY

Date Received March 12, 1980

Quad _____ FWL _____ FSL _____

File No. L-7513 -S Use IRR Location No. 19.37.34.31313

[illegible]

STATE ENGINEER OFFICE
ROSWELL, N.M.

Nate O'daker
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

NUMBER OF COPIES RECEIVED	
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FILE	
U.S.G.S.	
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TRANSPORTER	OIL GAS
PROMOTION OFFICE	
OPERATOR	

MEXICO OIL CONSERVATION COMMISSION
Santa Fe, New Mexico

HOBBS OFFICE

JAN 13 1964

WELL RECORD

Mail to District Office, Oil Conservation Commission, to which Form C-101 was sent not later than twenty days after completion of well. Follow instructions in Rules and Regulations of the Commission. Submit in **QUINTUPLICATE**. If State Land submit 6 Copies

AREA 640 ACRES
LOCATE WELL CORRECTLY

Ashmun & Hilliard Oil Company
(Company or Operator)

J. W. Cooper
(Lease)

Well No. 1, in NE $\frac{1}{4}$ of NW $\frac{1}{4}$, of Sec. 3, T. 20-S, R. 37-E, NMPM.
Wildcat Pool, Lea County.

Well is 1916 feet from north line and 2077 feet from West line
of Section 3. If State Land the Oil and Gas Lease No. is _____

Drilling Commenced 10-17-63, 19____ Drilling was Completed 12-2, 19 63

Name of Drilling Contractor Blackstock, Inc.

Address 603 V & J Tower Bldg., Midland, Texas

Elevation above sea level at Top of Tubing Head 3555' Gr. Lvl. The information given is to be kept confidential until _____, 19____

OIL SANDS OR ZONES

No. 1, from 6595 to 6613 No. 4, from _____ to _____
No. 2, from _____ to _____ No. 5, from _____ to _____
No. 3, from _____ to _____ No. 6, from _____ to _____

IMPORTANT WATER SANDS

Include data on rate of water inflow and elevation to which water rose in hole.

No. 1, from None to _____ feet.
No. 2, from _____ to _____ feet.
No. 3, from _____ to _____ feet.
No. 4, from _____ to _____ feet.

CASING RECORD

SIZE	WEIGHT PER FOOT	NEW OR USED	AMOUNT	KIND OF SHOE	CUT AND PULLED FROM	PERFORATIONS	PURPOSE
13 3/8	40#	New	253.85	Halliburton			
9 5/8	32# 36#	New	4000	Halliburton			
7	20# 23#	New	6820	Halliburton		(See below)	

MUDDING AND CEMENTING RECORD

SIZE OF HOLE	SIZE OF CASING	WHERE SET	NO. SACKS OF CEMENT	METHOD USED	MUD GRAVITY	AMOUNT OF MUD USED
16	13 3/8	253.85	300 sx	Pump		
11 1/2	9 5/8	4000	400 sx	Pump		
8 3/4	7	6820	400 sx	Pump		

RECORD OF PRODUCTION AND STIMULATION

RECORD OF DRILL-STEM AND SPECIAL TESTS

If drill-stem or other special tests or deviation surveys were made, submit report on separate sheet and attach hereto

TOOLS USED

Rotary tools were used from Surface feet to 7900' TD feet, and from _____ feet to _____ feet.
Cable tools were used from _____ feet to _____ feet, and from _____ feet to _____ feet.

PRODUCTION

Put to Producing Allowable effective 12-13, 1963

OIL WELL: The production during the first 24 hours was 185 barrels of liquid of which 92 % was
was oil; _____ % was emulsion; 8 % water; and 2/10 of 1 % was sediment. A.P.I.
Gravity _____

GAS WELL: The production during the first 24 hours was _____ M.C.F. plus _____ barrels of
Liquid Hydrocarbon. Shut in Pressure _____ lbs.

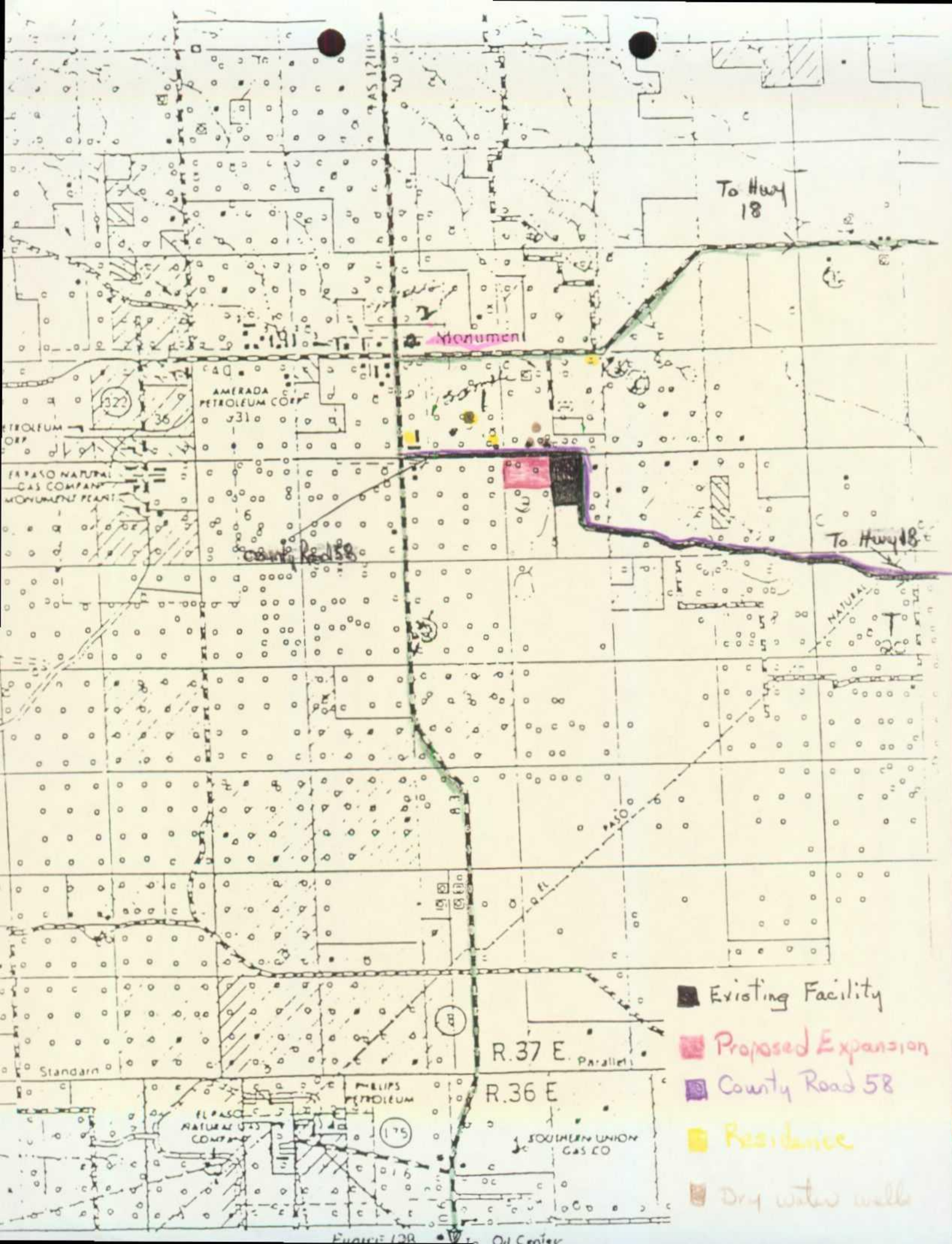
Length of Time Shut in _____

PLEASE INDICATE BELOW FORMATION TOPS (IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE):

Southeastern New Mexico		Northwestern New Mexico	
T. Anhy.....	1316	T. Devonian.....	T. Ojo Alamo.....
T. Salt.....	1410	T. Silurian.....	T. Kirtland-Fruitland.....
B. Salt.....	2470	T. Montoya.....	T. Farmington.....
T. Yates.....	2622	T. Simpson.....	T. Pictured Cliffs.....
T. 7 Rivers.....	2878	T. McKee.....	T. Menefee.....
T. Queen.....	3412	T. Ellenburger.....	T. Point Lookout.....
T. Grayburg.....	3680	T. Gr. Wash.....	T. Mancos.....
T. San Andres.....	3906	T. Granite.....	T. Dakota.....
T. Glorieta.....	5215	T.	T. Morrison.....
T. Drinkard.....	6693	T.	T. Penn.....
T. Tubbs.....	6355	T.	T.
T. Abo.....	7012	T.	T.
T. Penn.....	7882	T.	T.
T. Miss.....		T.	T.

FORMATION RECORD

From	To	Thickness in Feet	Formation	From	To	Thickness in Feet	Formation
Surf.	1316	1316	Red beds & sand				
1316	1410	94	Anhydrite				
1410	2470	1060	Salt & Anhydrite				
2470	2622	152	Anhydrite & dolomite				
2622	2878	256	Sand, Shale & Dolomite				
2878	3412	534	Dolomite				
3412	3680	268	Sand & Dolomite				
3680	5215	1535	Dolomite & Anhydrite				
5215	6693	1478	Dolomite, Sand & Shale				
6693	7900TD1207		Dolomite, Limestone, Sand & Shale.				



The Santa Fe New Mexican

Since 1849. We Read You.

EDDIE SEAY CONSULTING
601 W. ILLINOIS
HOBBS, NM 88240

AD NUMBER: 684495

ACCOUNT: 999901

LEGAL NO: 62255

P.O. #:

182

LINES

ONCE

at \$ 116.48

Affidavits: 5.25

Tax: 7.61

Total: \$ 129.34

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following application has been submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(NM-01-0012) - C & C Landfarm, Inc., Eddie W. Seay, Agent, P.O. Box 55 Monument, New Mexico, 87255, has submitted for approval an application to modify their previously approved commercial landfarm located in the SW/4 NE/4 of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils associated with oil and gas production. Soils are remediated by spreading them on the ground surface in 6 inch lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the west 80 acres. Ground water most likely to be affected by any accidental discharges at the surface is at a depth of 25 feet to 540 feet. The boundary for the facility is underlain by redbeds ranging in thickness from 430 feet to 1200 feet. The permit application addresses the construction, operations,

spill/leak prevention and monitoring procedures to be incorporated at the proposed site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed application, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the application based on information available. If a public hearing is held, the Director will approve the application based on the information in the application and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of August 1997.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY
Director

Legal #62255
Pub. August 25, 1997

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a New paper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 62255 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 25 day of AUGUST 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

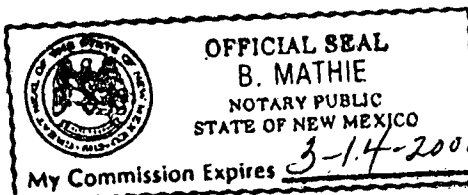
/S/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
25 day of AUGUST A.D., 1997

Notary B. Mathie

Commission Expires 3-14-2001



Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Legal Notice

Notice of Publication

~~and numbered~~ XXXXXX

~~XXXXXXXXXXXX~~ XXXXXXXXXX

~~XXXXXXXXXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXX XXXX XXXX XXXX XXXX~~

~~XXXXXXXXXXXX~~ for one (1) day

~~XXXXXXXXXXXX~~ beginning with the issue of

August 20, 1997

and ending with the issue of

August 20, 1997

And that the cost of publishing said notice is the sum of \$ 50.40

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 21st

day of August, 1997

Jean Serier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

LEGAL NOTICE NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Oil Conservation Division Regulations, the following application has been submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

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430 feet to 1200 feet. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be incorporated at the proposed site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed application, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines

there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve application based on information in the application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of August, 1997.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director

SEAL
Published in the Lovington Daily Leader August 20, 1997.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

4a. Article Number

106 612 621

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

Aug 22 1997

5. Signature (Addressee)

[Signature]

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS 87501-9998

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Robert L. Rodgers, Jr.
Star Rt. A, Box 51
Monument, NM 88265

4a. Article Number

106 612 629

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-22-97

5. Signature (Addressee)

[Signature]

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Carlyle J. Hall
P.O. Box 163
Monument, NM 88265

4a. Article Number

106 612 618

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-22-97

5. Signature (Addressee)

[Signature]

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
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- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Larry or Patsy Hunt
P.O. Box 208
Monument, NM 88265

4a. Article Number
Z 106 612 628

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
8-22-97

5. Signature (Addressee)

Patsy Hunt

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Coy R. Doyal
Box 188
Monument, NM 88265

4a. Article Number
Z 106 612 616

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
8/26

5. Signature (Addressee)

Judith Doyal

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Sarah Phillips
1325 E. Central
Amarillo, TX 79108

4a. Article Number
Z 106 612 630

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
AUG 22 1997

5. Signature (Addressee)

MATTIE F MOORE

6. Signature (Agent)

Mattie F. Moore

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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Is your RETURN ADDRESS completed on the reverse side?

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- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Village of Monument
Monument, NM 88265

4a. Article Number

106 612 625

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-26-97

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Glyn Mark Stone
P.O. Box 20
Monument, NM 88265

4a. Article Number

106 612 632

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-26-97

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Roger Villalobos
913 Sayers Dr.
Hobbs, NM 88241

4a. Article Number

106 612 624

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-27

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Arthur Travis Schwertfeger
Family Trust
413 West Blanco Dr
Hobbs, NM 88241

4a. Article Number
106 612 626

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
8-21-97

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Dorotea Cadena
Box 244
Sunice, NM 88231

4a. Article Number
106 612 627

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
8-21-97

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Jimmy B. Cooper
P. O. Box 36
Monument, NM 88265

4a. Article Number
106 612 617

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
8-21-97

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Velton G. Setzler
1.O. Box 205
Monument, NM 88265

4a. Article Number

Z 106 612 625

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-21-97

5. Signature (Addressee)

Saundra Setzler

6. Signature (Agent)

Saundra Setzler

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

SW Cattle Co.
P.O. Box 549
Hobbs, NM 88241

4a. Article Number

Z 106 612 615

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8-22-97

5. Signature (Addressee)

6. Signature (Agent)

D. H. Rennels

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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SENDER:

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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Carolyn J. Taylor
7411 Valdez
Hobbs, NM 88241

4a. Article Number

Z 106 612 631

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

8/22

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Write "Return Receipt Requested" on the mailpiece below the article number.
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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Witt V. Laughlin, Est.
Elsie Reeves
P.O. Box 90706
White Mountain Lake, AL
35912

4a. Article Number

Z 106 612 622

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
100 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-137
Originated 8/8/95
Revised 6/25/97

RECEIVED

AUG 12 1997

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY
(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other _____

☒ Solids/Landfarm ☐ Treating Plant

2. Operator: C & C Landfarm Inc.

Address: Box 55 Monument, NM 88265

Contact Person: Eddie W. Seay Phone: (505) 392-2236

3. Location: N 1/2 4 NW 1/4 4 Section 3 Township 20 Range 37
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☐ Yes ☐ No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

8. Attach a contingency plan for reporting and clean-up for spills or releases.

9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

12. Attach proof that the notice requirements of OCD Rule 711 have been met.

13. Attach a contingency plan in the event of a release of H₂S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay Title: Agent

Signature: Eddie W. Seay Date: 8-8-97

List of names and addresses of record of all landowners
within 1 mile of the proposed expansion.

SW Cattle Co.
P.O. Box 549
Hobbs, NM 88241

Coy R. Doyal
Box 188
Monument, NM 88265

Jimmy B. Cooper
P.O. Box 36
Monument, NM 88265

Carlyle J. Hall
P.O. Box 163
Monument, NM 88265

Joe R. Williams
Box 215
Monument, NM 88265

Jimmy T. Cooper
Box 55
Monument, NM 88265

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

Witt V. Laughlin, Est.
Elsie Reeves
P.O. Box 90706
White Mountain Lake, AZ 85912

Velton O. Setzler
P.O. Box 205
Monument, NM 88265

Roger Villalobos
913 Sayers Dr.
Hobbs, NM 88241

Village of Monument
Monument, NM 88265

List of names & addresses continued:

Arthur Travis Schwertfeger Family Trust
413 West Blanco Dr.
Hobbs, NM 88241

Dorotea Cadena
Box 244
Eunice, NM 88231

Larry or Patsy Hunt
P.O. Box 208
Monument, NM 88265

Robert L. Rodgers, Jr.
Star Rt. A, Box 51
Monument, NM 88265

Sarah Phillips
1323 E. Central
Amarillo, TX 79108

Carolyn J. Taylor
7411 Valdez
Hobbs, NM 88241

Glyn Mark Stone
P.O. Box 20
Monument, NM 88265

Existing Land farm

Entrance from land farm

N ↑

○ Dry water wells

○ Dry water wells

County Rd 58

UNIT C

40 AC

Divided into 5 AC Cells
as Needed.

UNIT D

40 AC

Divided into 5 AC Cells
as Needed.

— — — Sid Richardson Pipeline

Fence

Buffer Zone

Berm

Trench

CONSTRUCTION OF PROPOSED SITE

The 80 acre site which is proposed, will be fenced with a barbed wire fence with an entrance from the existing landfarm only. A buffer zone will be kept around facility to divert any runoff from adjacent properties. A berm inside the trench will be maintained as a secondary precaution to prevent runoff or runoff of facility. All cells will be disked and monitored and no cell will be built on an existing pipeline. There will be no buildings or storage of any kind on the facility and only waste approved by OCD will be admitted.

- 1) 4 strand barbed fence around site.
- 2) Buffer zone.
- 3) Trench - between berm and buffer zone.
- 4) Berm around the perimeter.
- 5) Sid Richardson Pipeline 4 in. gas line buried 36 in.
- 6) Texas-New Mexico Pipeline 6 in. oil line buried 2 ft.
- 7) Access from other landfarm only.
- 8) Proposed cells not to exceed 5 acres. All cells will be kept off pipeline.

INFORMATION

- (E) Only exempt oil and gas waste will be accepted at the landfarm unless special approval by OCD environmentalist. The material accepted will have documentation as to where, what company, who delivered it and signed by an authorized company person, also C & C will also require analysis of the material before accepting it.

The material will be hauled in by truck, spread into six inch lifts and disked every other week.

Each cell's treatment zone will be tested on a quarterly basis for BTEX, TPH and for metals yearly, with analysis and report sent to Santa Fe OCD.

- (F) C & C will adhere to OCD Rule 116.
- 1) Report any accidental discharge by phone immediately.
 - 2) Clean up and/or remediate according to OCD policy.
 - 3) File written reports as necessary.
- (G) Personnel will be on location at all times when material is being hauled. Gates will be kept locked and secured. Any water that accumulates on the property from rain will be vacuumed and hauled. Water may be added to landfarm from time to time for dust control and to enhance remediation.
- (H) An open system such as a landfarm, should not have an H2S problem. If H2S becomes a problem, proper testing and notice will be conducted.
- (I) Once C & C has stopped operations, it is estimated it will take approximately two years to finish remediating what soil is left in landfarm.
- 1) Quarterly analysis for two years.
BTEX, TPH and Metals Cost: \$ 1,600.00
 - 2) Disk and tilling for two years every other week. We presently contract this on our existing 80 acres at a cost of \$8,000.00 per year, for two years Cost: \$16,000.00
 - 3) After area has been remediated, to level area and seed will approximately Cost: \$ 900.00

Total Closure Cost: \$18,500.00

HYDROLOGY AND GEOLOGY OF PROPOSED SITE

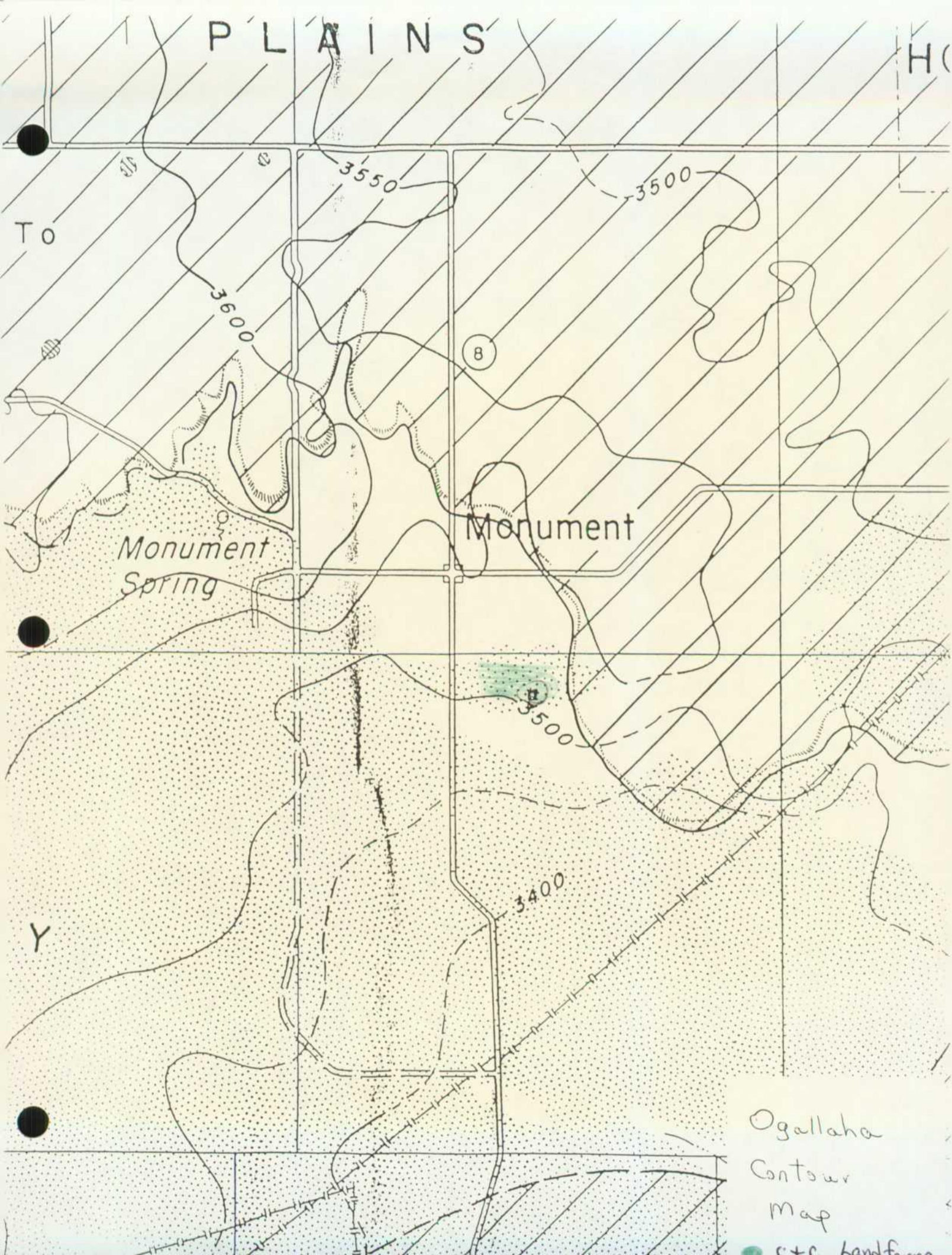
Geographically, the site is situated near the western boundary of the southern extension of the High Plains in southeastern New Mexico. The proposed site is an 80 acre tract located in Unit C & D, Sect. 3, T. 20 S., R. 37 E., Lea Co., NM. The site is adjacent to the existing C & C Landfarm which is permitted by the OCD. The site, which is bordered by County Road 58 to the north, has a gradual surface slope to the west. The site is situated below the white breaks or caprock area where little or no water is found. Research of State Engineer records and USGS files show no fresh water was recorded or found within the area of review. Three water wells were drilled in Sect. 34 adjacent to the proposed site. All wells, drilled by Van Noy Drilling, were recorded as dry holes with redbeds at 29 ft. (Logs attached) The redbed in this area range in thickness from 600 to 1000 ft. from logs of oil wells in the area. (Attached)

The only water wells within the area are a windmill approximately 1 mile south of the site, and a water well 3/4 mile northwest of site. A copy of a recent analysis is within. These wells were not listed on State Engineer's list of water wells.

For the past several years that C & C has been permitted to operate and monitor its existing facility, no water has been found in the monitor wells or the caliche pits, which are excavated down to top of redbeds, and we have found no water on the proposed site. I feel that without the presence of water and the preventive measures of the trench and berms to prevent runoff and runoff of water, and the constant and consistent monitoring of the treatment zone below the proposed site and the existing facility, this should be a safe site for the disposal and remediation of oilfield contaminated soils.

	LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	BASIN FILE
2	20S 36E 09 13440	10/12/84	434	2350	63F	T06	L
5	20S 36E 10 32114	08/28/72	79	520		GAL	L
6	20S 36E 10 32114	11/01/76	66	889	66F	GAL	L
7	20S 36E 10 32114	10/19/79	68	880	66F	GAL	L
8	20S 36E 10 32114	10/12/84	92	980	64F	GAL	L
10	20S 36E 11 42243	08/28/72	1000	1450		GAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	GAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	GAL	L
13	20S 36E 11 42243	10/12/84	840	4330	64F	GAL	L
15	20S 36E 15 242421	08/28/72	720	1800		GAL	L
16	20S 36E 15 242421	11/01/76	518	3223		GAL	L
17	20S 36E 15 242421	10/12/84	882	3630	63F	GAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	GAL	L
20	20S 36E 15 24342	03/30/54	1080	6780		T06	L
21	20S 36E 15 24342	09/09/58	1240	7500		T06	L
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
26	20S 36E 26 24344	11/08/79	150	1790		T06	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	T06	L
29	20S 36E 26 24443	11/08/79	182	1895		T06	L
31	20S 36E 35 24444	11/08/79	118	1541		T06	L
33	20S 37E 04 11114	04/02/54	450	2180		GAL	L
34	20S 37E 04 11114	04/22/55	425	2090		GAL	L
35	20S 37E 04 11114	09/09/58	325	1670		GAL	L
37	20S 37E 04 221321	04/22/55	51	758		GAL	L
38	20S 37E 04 221321	09/09/58	47	708		GAL	L
39	20S 37E 04 221321	07/14/77	106	1070		GAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	GAL	L
41	20S 37E 04 221321	2/06/85	81	964		GAL	L
43	20S 37E 05 222144	11/29/79	258	1611		T06	L
44	20S 37E 05 222144	9/26/84	314	1729		T06	L
46	20S 37E 07 24331	11/09/79	1268	4232		T06	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	T06	L
49	20S 37E 08 244124	11/29/79	868	3734	57F	T06	L 07620 ES
51	20S 37E 08 423223	10/25/79	520	2396	66F	T06	L
52	20S 37E 08 423223	9/26/84	886	3806		T06	L

29/09/19	USG	DOM	19S.37E.04.111444	3692.00	32	0	0	62	PLUG	U		0
64/07/22	OCC	IRR	19S.37E.04.11333	3692.00 DP	350	0	0	0		P	25-12260	0
65/09/08	SED	IRR	19S.37E.04.11333	3692.00 DP	35	670	0	68	0877		25-12260	0
71/09/08	SED	IRR	19S.37E.04.11333	3692.00 DP	91	907	0	66	0877		25-12260	0
77/09/08	SED	IRR	19S.37E.04.11333	3692.00 DP	30	630	0	0	0777		25-12260	0
84/09/19	SED	IRR	19S.37E.04.11333	3692.00 DP	28	563	0	67	1084		25-12260	0
90/06/14	SED	IRR	19S.37E.04.11333	3692.00 DP	71	565	0	0	1190		25-12260	0
79/10/17	SED	IRR	19S.37E.04.411122	3974.00 DP	34	607	0	66				0
84/09/19	SED	IRR	19S.37E.04.411122	3974.00 DP	42	649	0	65	1084			0
60/11/21	OCC	STK	19S.37E.04.41200	3672.00 DP	195	0	0	0		P	25-12262	0
60/11/22	OCC	DOM	19S.37E.04.412231	3672.00 YT	37	0	0	0		P	25-12263	0
76/12/21	SED	STK	19S.37E.04.412231	3672.00 DP	80	1114	0	63			25-12263	0
77/06/17	SED	DOM	19S.37E.04.412231	3672.00 YT	88	1161	0	0	0677		25-12263	0
79/10/19	SED	STK	19S.37E.04.412231	3672.00 DP	48	746	0	65	0683		25-12263	0
84/09/26	SED	STK	19S.37E.04.412231	3672.00 DP	65	903	0	64	0586		25-12263	0
79/10/24	SED	STK	19S.37E.08.31111	3698.00 DP	48	731	0	65			25-12267	0
79/10/19	SED	STK	19S.37E.16.233212	3650.00 DP	44	680	0	0			25-12274	0
84/11/08	SED	STK	19S.37E.16.233212	3650.00 DP	34	610	0	65	1284		25-12274	0
90/06/14	SED	STK	19S.37E.16.233212	3650.00 DP	75	611	0	65	1190		25-12274	0
79/10/19	SED	STK	19S.37E.17.43143	3665.00 DP	46	688	0	66			25-12276	0
84/09/26	SED	STK	19S.37E.17.43143	3665.00 DP	78	797	0	64	1184		25-12276	0
79/10/24	SED	STK	19S.37E.19.113211	3703.00 DP	62	728	0	69			25-12278	0
84/11/08	SED	STK	19S.37E.19.113211	3703.00 DP	45	661	0	0	1284		25-12278	0
90/06/14	SED	STK	19S.37E.19.42222	3642.00 DP	225	1140	0	65	1190			0
79/10/24	SED	STK	19S.37E.20.23122	3677.00 DP	116	968	0	68			25-12279	0
79/11/07	SED	STK	19S.37E.23.334133	3615.00 DP	86	1027	0	62			25-12281	0
84/11/07	SED	STK	19S.37E.23.334133	3615.00 DP	61	777	0	67	1284		25-12281	0
90/06/19	SED	STK	19S.37E.23.334133	3615.00 DP	85	937	0	63	1190		25-12281	0
84/09/26	SED	DOM	19S.37E.28.42421	3586.00 YT	60	757	0	0	1184			0
90/06/19	SED	DOM	19S.37E.28.42421	3586.00 YT	65	716	0	0	1190			0
79/11/29	SED	STK	19S.37E.28.42422	3584.00 DP	58	733	0	0	0683		25-12282	0
54/07/15	USG	MTU	19S.37E.29.43143	3589.00 YT	91	865	0	75		U		0
58/09/09	SED	MTU	19S.37E.29.43143	3589.00 YT	73	678	0	0		U		0
79/11/29	SED	DOM	19S.37E.30.444123	3594.00 YT	88	947	0	0				0
84/09/26	SED	DOM	19S.37E.30.444123	3594.00 YP	151	1001	0	0	1184			0
90/06/14	SED	DOM	19S.37E.30.444123	3594.00 DP	115	935	0	0	1190			0
79/10/25	SED	DOM	19S.37E.32.31440	3569.00 DP	224	1582	0	78			25-12898	0
79/10/25	SED	DOM	19S.37E.32.411343	3570.00 YT	260	1601	0	0				0
84/11/07	SED	DOM	19S.37E.32.411343	3570.00 YT	134	1057	0	0	1284			0
79/10/25	SED	IRR	19S.37E.32.41322	3567.00 DP	226	1427	0	0				0
84/09/20	SED	IRR	19S.37E.32.41322	3567.00 DP	235	1593	0	0	1084			0
79/11/29	SED	DOM	19S.37E.34.112412	3576.00 YT	60	731	0	0				0
84/09/26	SED	DOM	19S.37E.34.112412	3576.00 YT	49	700	0	0	1284			0
84/11/07	SED	DOM	19S.37E.34.112412	3576.00 YT	59	725	0	0	1284			0
79/10/11	SED	IRR	19S.37E.34.334322	3563.00 DP	94	1038	0	67				0
79/10/17	SED	IRR	19S.38E.01.314242	3607.00 SPRKLR	240	1866	0	0				0
53/05/29	USG	MUN	19S.38E.02.13321	0.00	80	849	0	0	PLUG	U		0
57/08/14	SED		19S.38E.03.13133	0.00 YT	80	0	0	0				0
57/08/14	SED	DOM	19S.38E.04.112243	0.00 DP	88	0	0	0				0
57/08/14	SED	DOM	19S.38E.04.12124	0.00 DP	104	0	0	0				0
57/08/13	SED	PPP	19S.38E.04.12414	0.00 DP	327	0	0	0	ABDN			0
57/08/12	SED	DOM	19S.38E.04.243321	3612.00 YT	40	0	0	0				0
79/10/18	SED	DOM	19S.38E.04.243321	3612.00 YT	90	816	0	65				0
79/10/18	SED	DOM	19S.38E.04.243323	3612.00 YT	28	655	0	66				0
57/08/14	SED	DOM	19S.38E.04.243323	3612.00 YT	64	0	0	0				0
79/11/23	SED	DOM	19S.38E.04.243323	3612.00 YT	59	720	0	0				0
85/02/14	SED	NOT	19S.38E.04.243323	3612.00 YT	120	1030	0	0	0385			0
75/03/17	ONR	DOM	19S.38E.04.24333	0.00 YT	46	610	0	0		0		0
57/08/14	SED	DOM	19S.38E.04.244443	3613.00 YT	48	0	0	0				0
76/11/23	SED	DOM	19S.38E.04.244443	3613.00 YT	78	774	0	0				0



Ogallala
Contour
map
s+c landform

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Carlyle J. Hall Owner's Well No. 01
 Street or Post Office Address P.O. Box 163
 City and State Monument, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

- SE 1/4**
 a. $\frac{1}{4}$ ~~SW~~ $\frac{1}{4}$ **SE** $\frac{1}{4}$ **SW** $\frac{1}{4}$ of Section 34 Township 19S 50. Range 37 East N.M.P.M.
E1320', S330", W 1320', beginning, 10 ac
 b. Tract No. _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208
 Address Box 7, Oil Center, NM 88266

Drilling Began 2-25-91 Completed 2-26-91 Type tools Cable Size of hole 8" in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well dry ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>dry</u>				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>None</u>								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received **March 17, 1992**

Quad _____ FWL _____ FSL _____

File No. L-10,166 (1) (DRY HOLE) Use DOM & STK Location No. 19.37.34.3441

#1 19.37.34.3441

[illegible]

10-11-00

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Carlyle J. Hall Owner's Well No. 02
 Street or Post Office Address Box 163
 City and State Monument, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

- a. $\frac{1}{4}$ ~~SE~~ SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 34 Township 19S Range 37E N.M.P.M.
E 1320', S 330', W 1320', beginning, 10ac
- b. Tract No. _____ of Map No. _____ of the _____
- c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
- d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. VAN NOY License No. WD-238

Address P. O. BOX 7, OIL CENTER, NM 88266

Drilling Began 2-26-91 Completed 2-27-91 Type tools Cable Size of hole 8 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well DRY ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
DRY				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
NONE								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 17, 1992

Quad _____ FWL _____ FSL _____

File No. L-10,166 (2) (DRY HOLE) Use DOM & STK Location No. 19.37.34.3441

[illegible]

W. L. Van Noy
Driller

INSTRUCTIONS: This form shall be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well CARLYLE J. HALL Owner's Well No. 03
 Street or Post Office Address BOX 163
 City and State MONUMENT, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

- a. SE 1/4 ~~SW 1/4~~ SE 1/4 SW 1/4 of Section 34 Township 19S Range 37E N.M.P.M.
e 1320, s 330', w 1320' beginning, 10 ac
- b. Tract No. _____ of Map No. _____ of the _____
- c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
- d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. VAN NOY License No. WD-208

Address BOX 7, OIL CENTER, NM 88266

Drilling Began 1-29-92 ~~3-29-91~~ Completed 1-30-92 Type tools Cable Size of hole 8 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well DRY ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
DRY				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
NONE								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 17, 1992

Quad _____ FWL _____ FSL _____

File No. L-10,166 (03) (DRY HOLE) Use DOM & STK Location No. 19.37.34.3441

#3 19.37.34.3441

[illegible]

W. R. Van Noy
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

**STATE ENGINEER OFFICE
WELL RECORD**

FIELD ENGR. LOG

Section 1. GENERAL INFORMATION

(A) Owner of well Joe Williams Owner's Well No. _____
 Street or Post Office Address 1330 Cenfial
 City and State Alb. N. M., 87105

Well was drilled under Permit No. L-7513-S and is located in the:

a. SW $\frac{1}{4}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 34 Township 19S Range 37E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in the _____ Grant.

(B) Drilling Contractor G. D. Oldaker, License No. WD-657

Address P. O. Box 2321, Hobbs, New Mexico, 88240

Drilling Began 12/15/79 Completed 12/17/79 Type tools rotary Size of hole 10 $\frac{1}{2}$ in.

Elevation of land surface or 3650 at well is 3650 ft. Total depth of well 44 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 25 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>25</u>	<u>44</u>	<u>19</u>	<u>Water, Sand</u>	<u>25</u> GPM

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>6 5/8</u>			<u>0</u>	<u>44</u>	<u>44</u>	<u>none</u>	<u>25</u>	<u>44</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
		<u>10$\frac{1}{2}$</u>			

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
<u>1</u>			
<u>2</u>			
<u>3</u>			
<u>4</u>			

FOR USE OF STATE ENGINEER ONLY

Date Received March 12, 1980

Quad _____ FWL _____ FSL _____

File No. L-7513-S Use IRR Location No. 19.37.34.31313

[illegible]

STATE ENGINEER OFFICE
ROSWELL, N.M.

Node Oshaker
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

NUMBER OF COPIES RECEIVED	
SANTA FE	
U.S. DEPT. OF THE INTERIOR	
LAND OFFICE	
TRANSPORTER	OIL GAS
PRODUCTION OFFICE	
OPERATOR	

NEW MEXICO OIL CONSERVATION COMMISSION
Santa Fe, New Mexico

HOBBS OFFICE

JAN 13 8 48 AM '64

WELL RECORD

Mail to District Office, Oil Conservation Commission, to which Form C-101 was sent not later than twenty days after completion of well. Follow instructions in Rules and Regulations of the Commission. Submit in **QUINTUPLICATE**. If State Land submit 6 Copies

NO. 1 AREA 640 ACRES
 LOCATE WELL CORRECTLY

Ashmun & Hilliard Oil Company J. W. Cooper
 (Company or Operator) (Lessee)

Well No. 1, in NE $\frac{1}{4}$ of NW $\frac{1}{4}$, of Sec. 3, T. 20-S, R. 37-E, NMPM.
Wildcat Pool, Lea County.

Well is 1916 feet from north line and 2077 feet from West line
 of Section 3. If State Land the Oil and Gas Lease No. is _____

Drilling Commenced 10-17-63, 19____. Drilling was Completed 12-2, 1963

Name of Drilling Contractor Blackstock, Inc.
 Address 603 V & J Tower Bldg., Midland, Texas

Elevation above sea level at Top of Tubing Head 3555' Gr. Lvl. The information given is to be kept confidential until _____, 19____.

OIL SANDS OR ZONES

No. 1, from 6595 to 6613 No. 4, from _____ to _____
 No. 2, from _____ to _____ No. 5, from _____ to _____
 No. 3, from _____ to _____ No. 6, from _____ to _____

IMPORTANT WATER SANDS

Include data on rate of water inflow and elevation to which water rose in hole.

No. 1, from None to _____ feet.
 No. 2, from _____ to _____ feet.
 No. 3, from _____ to _____ feet.
 No. 4, from _____ to _____ feet.

CASING RECORD

SIZE	WEIGHT PER FOOT	NEW OR USED	AMOUNT	KIND OF SHOE	CUT AND PULLED FROM	PERFORATIONS	PURPOSE
13 3/8	40#	New	253.85	Halliburton			
9 5/8	32# 36#	New	4000	Halliburton			
7	20# 23#	New	6820	Halliburton		(See below)	

MUDDING AND CEMENTING RECORD

SIZE OF HOLE	SIZE OF CASING	WHERE SET	NO. SACKS OF CEMENT	METHOD USED	MUD GRAVITY	AMOUNT OF MUD USED
16	13 3/8	253.85	300 SX	Pump		
11 1/2	9 5/8	4000	400 SX	Pump		
8 3/4	7	6820	400 SX	Pump		

RECORD OF PRODUCTION AND STIMULATION

RECORD OF DRILL-STEM AND SPECIAL TESTS

If drill-stem or other special tests or deviation surveys were made, submit report on separate sheet and attach hereto

TOOLS USED

Rotary tools were used from Surface feet to 7900' TD feet, and from _____ feet to _____ feet.
Cable tools were used from _____ feet to _____ feet, and from _____ feet to _____ feet.

PRODUCTION

Put to Producing Allowable effective 12-13, 1963

OIL WELL: The production during the first 24 hours was 165 barrels of liquid of which 92 % was
was oil; _____ % was emulsion; 8 % water; and 2/10 of 1 % was sediment. A.P.I.
Gravity _____

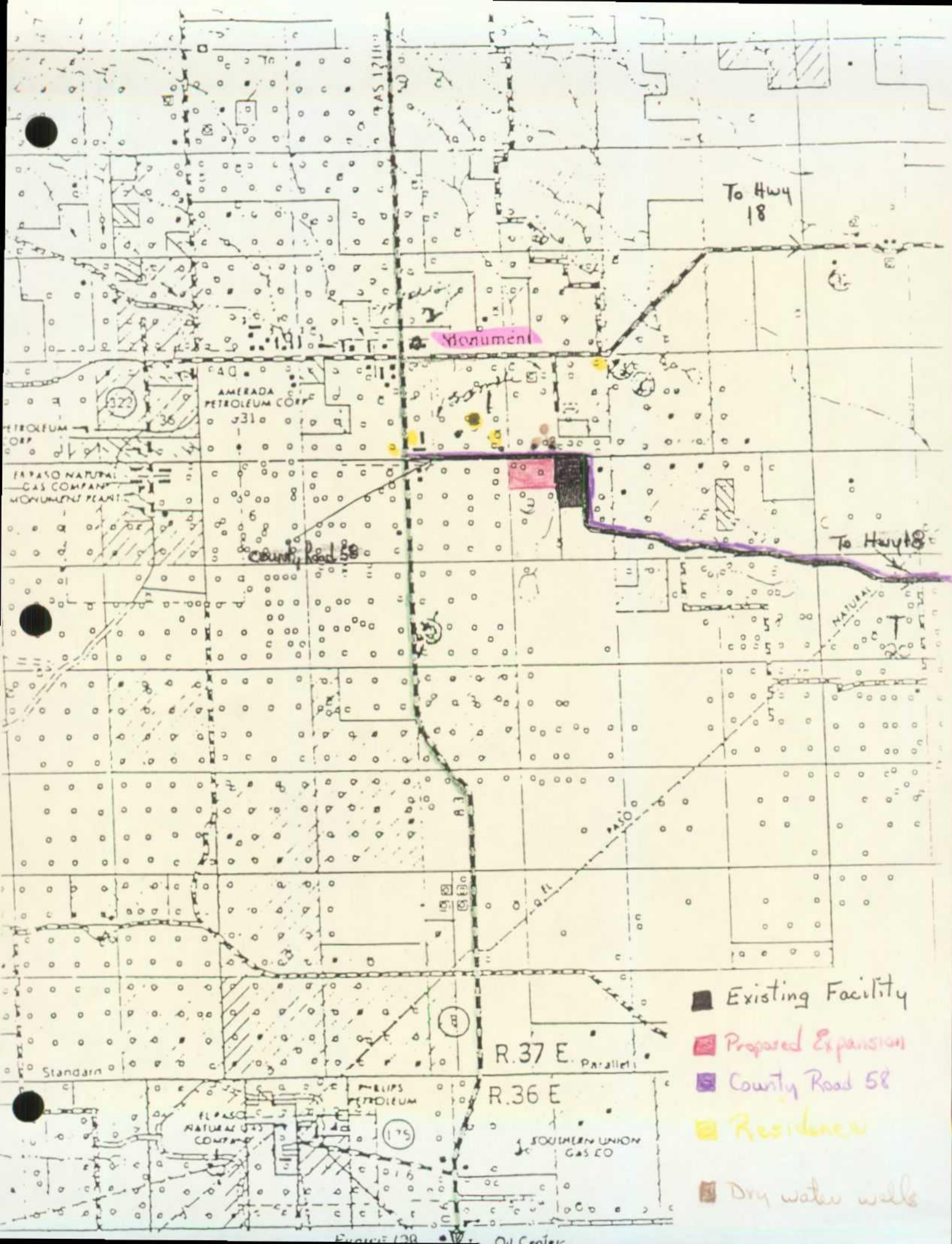
GAS WELL: The production during the first 24 hours was _____ M.C.F. plus _____ barrels of
liquid Hydrocarbon. Shut in Pressure _____ lbs.
Length of Time Shut in _____

PLEASE INDICATE BELOW FORMATION TOPS (IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE):

Southeastern New Mexico		Northwestern New Mexico	
T. Anhy. <u>1316</u>	T. Devonian _____	T. Ojo Alamo _____	
T. Salt <u>1410</u>	T. Silurian _____	T. Kirtland-Fruitland _____	
B. Salt <u>2470</u>	T. Montoya _____	T. Farmington _____	
T. Yates <u>2622</u>	T. Simpson _____	T. Pictured Cliffs _____	
T. 7 Rivers <u>2878</u>	T. McKee _____	T. Menefee _____	
T. Queen <u>3412</u>	T. Ellenburger _____	T. Point Lookout _____	
T. Grayburg <u>3680</u>	T. Gr. Wash _____	T. Mancos _____	
T. San Andres <u>3908</u>	T. Granite _____	T. Dakota _____	
T. Glorieta <u>5215</u>	T. _____	T. Morrison _____	
T. Drinkard <u>6693</u>	T. _____	T. Penn. _____	
T. Tubbs <u>6355</u>	T. _____	T. _____	
T. Abo <u>7012</u>	T. _____	T. _____	
T. Penn. <u>7882</u>	T. _____	T. _____	
T. Miss. _____	T. _____	T. _____	

FORMATION RECORD

From	To	Thickness in Feet	Formation	From	To	Thickness in Feet	Formation
Surf.	1316	1316	Red beds & sand				
1316	1410	94	Anhydrite				
1410	2470	1060	Salt & Anhydrite				
2470	2622	152	Anhydrite & dolomite				
2622	2878	256	Sand, Shale & Dolomite				
2878	3412	534	Dolomite				
3412	3680	268	Sand & Dolomite				
3680	5215	1535	Dolomite & Anhydrite				
5215	6693	1478	Dolomite, Sand & Shale				
6693	7900TD1207		Dolomite, Limestone, Sand & Shale.				



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 9:45	Date 7-10-97
<u>Originating Party</u> Eddie Seery		<u>Other Parties</u> Martyne Kicling
<u>Subject</u> Set Backs at CAC Land Farm & EPI Sampling		
<u>Discussion</u> Eddie Remembers Set backs of 100 P+ Measured at CAC From the Roads. Also EPI will Be Doing Quarterly Sampling For August in July (Re-Sampling For Metals High Hits)		
<u>Conclusions or Agreements</u>		
<u>Distribution</u>	Signed Martyne J. Kicling	

Wayne Price

Cnc File

From: Wayne Price
Sent: Tuesday, June 24, 1997 11:28 AM
To: Bill Olson
Cc: Chris Williams
Subject: Texas NM PL- C-138's C&C landfarm

JUN 26 1997

Re: TNMPL & Cooper Ranch Monument Remediation Project.

Dear Martyne & Bill:

I am sending to you two C-138's for the above re: project. I have given verbal approval. This is an on-going project.

I will include this memo to jog your memory :

Waiting For For of Knowledge of process letter From Roger A to Grip. 6/27/97
Mj



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 23, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-290

Mr. Eddie W. Seay
C&C Landfarm
601 W. Illinois
Hobbs, New Mexico 88240

**RE: Use of the caliche pit areas as landfarm cells
C&C Landfarm, Lea County, New Mexico**

Dear Mr Seay:

The New Mexico Oil Conservation Division (OCD) has received C&C's request to utilize the caliche pit areas as landfarm cells dated November 26, 1996. Incorporating the caliche pit areas within the existing permitted facility boundaries will increase the useable landfarm area by 10 acres

Based on the information provided in your request and the phone conversations on June 13 and June 17, 1997 the request to use the caliche pit areas is hereby approved subject to the following conditions:

1. Construction of the caliche pits as landfarm cells will include placing a french drain collection pipe along the down slope side of the bottom of each pit along the red bed contact.
2. Each pipe installation will be inspected by personnel from the Hobbs OCD office prior to burial.
3. The french drain collection system will be continually pumped so as not to contain any standing liquid.
4. The liquid removed from the french drain systems will be stored in tanks at the C&C Landfarm.
5. Treatment zone monitoring will include quarterly inspection and analysis of stored liquids collected from the french drains with in each caliche pit.

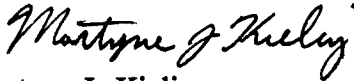
Mr. Eddie Seay
June 23, 1997
Page -2-

6. The stored liquid from the french drain collection system may be applied to the C&C Landfarm cells.
7. Operation of the caliche pit cells will follow all Landfarm Operating Conditions set forth under the C&C Commercial Landfarm Permit (NM-711-1-0012) Expansion dated October 8, 1996.

Please be advised that the OCD approval does not relieve C&C of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve C&C of the responsibility for compliance with other federal, state and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,



Martyne J. Kielling
Environmental Geologist

xc: OCD Hobbs Office

MEMORANDUM OF CONVERSATION

☒ TELEPHONE ☐ PERSONAL TIME 2:29 pm DATE 6/17/97

ORIGINATING PARTY Martyne Kieling

OTHER PARTIES Eddie Seay

DISCUSSION Caleche Pit to be used as Another Landfill
Cell. Verbal Approval was given to Eddie to begin
construction on the French Drain in the Down Slope
end of the Pit. Wayne Price will be notified
so He can visually inspect the Drain when it is
completed

CONCLUSIONS Follow up with Letter to Eddie.

MARTYNE KIELING Martyne Kieling
C: FILE
DISTRICT OFFICE _____

MEMORANDUM OF CONVERSATION

✓ TELEPHONE _____ PERSONAL _____ TIME 10:15 DATE 6/13/97

ORIGINATING PARTY Eddie Seay

OTHER PARTIES Martyne

DISCUSSION In Regards to letter Eddie wrote in Nov 1996
concerning Land Farming in the Calachic Pit Bottoms. He (Eddie)
has Talked to Roger & Wayne about How He would Do
Monitoring For Migration. The Pits only have 1 ft of Soil
and then Redbeds Dipping to the West / Northwest.
Eddie Has Proposed a French Drain System at the West
edge of the pit Bottom. to collect & Remove Moisture
From the Proposed Land Farm cells in the Pit Bottom.

Eddie waiting For Response.

CONCLUSIONS I will check the CRC File For the ADDU letter
and get a Response out to Eddy this Next week (by Phone &
written). I will Also Check with Roger & Wayne P.

MARTYNE KIELING Martyne Kieling
C: FILE
DISTRICT OFFICE _____



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

May 1, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-263

Mr. Jim Cooper
C & C Landfarm, Inc.
P.O. Box 55
Monument, New Mexico 88265

Re: C&C Landfarm NM-01-0012
Exempt E&P drill cuttings

Dear Mr. Cooper,

The New Mexico Oil Conservation Division (NMOCD) Environmental Bureau has received the inquiry you presented to NMOCD District I concerning C&C Landfarm, Inc. accepting RCRA exempt E&P drill cuttings.

The following procedure shall be used to accept drill cuttings into your permitted Landfarm.

1. All solids must be liquid free as per your permit conditions.
2. Pursuant to 19 NMAC 15.C.105, removal of drill cuttings from E&P sites must be approved by the appropriate District. The generator must submit a form C-103 to the District Supervisor.

The C&C landfarm operator must have a copy of the approved C-103 from the generator before acceptance is allowed. C&C shall maintain all records pursuant to its permit conditions.

3. C&C must ensure that any material accepted into the landfarm, such as drill cuttings, shall be compatible with other materials being land farmed and not interfere with the bio-remediation process. If such interferences occur, C&C will be required to isolate these solids and properly dispose of them in an approved NMOCD manner or at an approved NMOCD site.

Mr. Jim Cooper
May 1, 1997
Page 2—

If you require any further assistance concerning this matter please do not hesitate to call me at (505) 827-7152.

Sincerely yours,



Roger C. Anderson
Environmental Bureau Chief

RCA/twp:

xc: Jerry Sexton-NMOCD District I Supervisor
Wayne Price-NMOCD Environmental Engineer.

OIL CONSERVATION DIVISION
RECEIVED

'96 APR 12 AM 8 52

April 4, 1996

Chris Eustice
NM Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

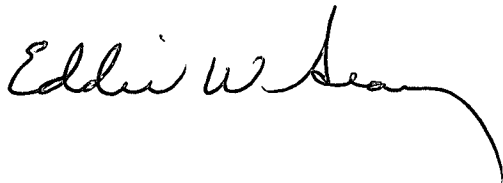
RE: C & C Landfarm Inc. Expansion Request

Dear Mr. Eustice:

Pursuant to your request by letter dated May 24, 1995, C & C has completed the task concerning the expansion of C & C's facility to add an additional 40 acre site adjacent to its existing landfarm. Included is a complete survey with red bed contour map and additional monitor wells as instructed. The only change, which was made and discussed with you earlier, was the movement of monitor wells 6 & 7 on the expansion so they would be inside our fenced area. Contained within is material as requested. I hope this will help with the approval process.

Your consideration in this matter will be greatly appreciated. If additional information is needed, please call.

Sincerely,



Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88240
(505)392-2236

C & C LANDFARM

INSTALL NEW MONITOR WELLS AT PROPOSED EXPANSION SITE

Eddie W. Seay, Agent for C & C Landfarm, Inc, and Wayne Price, Agent for Hobbs OCD, met to drill and complete monitor wells as instructed.

Drilling 6 1/2" hole installed 3" Sch40 pvc well with 5 ' of perforations using 1/16" holes 11 to 13 per ft. and screen with 20/40 frac sand above perfs and cap with Bentonite. Will cement later & install locking boxes. Auger Air was driller - 8:00am start.

Monitor Well #8

Top soil 0'-4'
caliche 4'-12'
caliche & sand 12'-14'
caliche & red sand 14'-19'
red bed 19'
TD 20'6"

Dry all the way down

Top of sand pack between casing & hole at 12'6"
1 sack bentonite, approx. 6' of fill
cement & locking boxes installed later.

Monitor Well #7

Top soil 0'-5'
caliche 5'-16'
caliche & sand 16'-18'
caliche 18'-21'
caliche & sand & gravel 21'-22'
sand & gravel 22'-23'
caliche 23'-26'
red sand & clay 26'-27'6"
red bed 27'6"-28'6"
TD 28'6"

Dry all the way down

Top of sand between casing & hole 21'
1 sack bentonite, approx. 6' of fill
cement & locking boxes installed later.

Monitor Well #6

Top soil 0'-5'6"
caliche 5'6"-10'
sand & gravel & caliche 10'-12'
caliche 12'-17'
fine sand 17'-19'

caliche & sand & gravel 19'-25'
sand & clay 25'-26'
red bed 26'
TD 27'
Dry all the way down
Top of sand between casing & hole 19'
1 sack bentonite, approx 6' of fill
cement & locking boxes installed later.

Red Bed very hard drilling.

CONCLUSIONS

From the drilling of the new monitor wells and monitoring the existing monitor wells, no water was encountered and continues to stay dry. This appears to be an environmentally safe site for the landfarm.

EDDIE SEAY CONSULTING

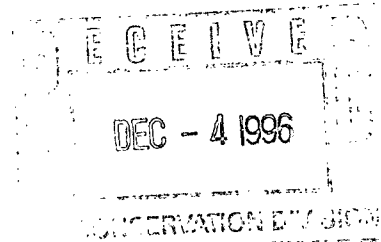
601 W. ILLINOIS
HOBBS, NEW MEXICO 88240
(505) 392-2236
FAX (505) 392-6949

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



November 26, 1996



Mr. Roger Anderson
NMOCD
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

RE: C & C Landfarm, Inc.

Dear Mr. Anderson:

As per our conversation, I am writing to request permission to utilize the caliche pit areas, which cover approximately ten acres, for additional space for landfarming. The pits are contained within our permitted area and surrounded by monitor wells. The pits have been excavated down to within approximately one foot of the top of the redbeds. The use of these pits will enhance our capacity and will make our operation more efficient.

Your consideration in this matter will be greatly appreciated.

Sincerely,

Eddie W. Seay

Eddie W. Seay, Agent



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT DIVISION
OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

RECEIVED

SEP 25 1996 8 52

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

September 24, 1996

Mr. Jim Cooper
C & C Landfarm
P.O. Box 55
Monument, NM 88265

Ref: Landfarm Extension Permit

Dear Mr. Cooper,

After your visit to the NMOCD office today and my resultant telephone conversation with Roger Anderson, NMOCD Environmental Bureau Chief, your request for verbal permission to start using the new portion of the C & C landfarm has been granted by Mr. Anderson.

Please note, the operation of the new portion of your facility will be contingent upon approval conditions that will be sent to you in the near future. You also are instructed to abide by all existing conditions imposed on your present facility for your new expanded facility.

Per our conversation please notify the NMOCD District I office to witness any of the new construction and/or modifications and the acceptance of the first load of material.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Wayne Price".

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Gary Wink-NMOCD District I Field Rep. II
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe

601 W. ILLINOIS
HOBBS, NEW MEXICO 88240
(505) 392-2236
FAX (505) 392-6949

EDDIE SEAY CONSULTING

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



June 21. 1996

NMOCD
2040 S. Pacheco
Santa Fe. NM 87505

ATTENTION: Chris Eustice

SUBJECT: C & C Landfarm. Inc.

Dear Sir:

I am writing this letter to request a change in our TPH limit at our landfarm. We have found it very difficult to remediate soils down to 100 ppm and expensive to compete with pit disposals and onsite remediation areas. I do understand we are a commercial site, as are the open pit disposals, but we are required to test, monitor and disk on a regular schedule, unlike pit disposals.

C & C has had to prove there is not any groundwater by drilling and completing 8 monitor wells to redbed, and have excavated down to redbed in two areas. We have monitored and tested as required and sent results to your office quarterly for the past 2 years.


C & C would like to operate somewhat like the ranking criteria set up in the OCD guidelines and want to remediate to the greatest extent practicable. I know the requirements for different operations are site specific, so please look at our site as it relates to your criteria.

Also, I have tested soils in various areas of Lea County and West Texas, some within oil operations and some out of production areas, with the background running from 50 to 150 ppm TPH.

Find within Texas Railroad Commission adoption of Rule 91, cleanup of spills. Their commercial landfarms operate on the same criteria. I am not asking for the same as Texas does, but maybe a compromise in New Mexico ranking criteria for cleanup.

Your help and consideration in this matter will be greatly appreciated. We will continue to operate according to the rules and our permit until I hear from you.

Sincerely,



Eddie W. Seay, Agent

enclosures 3

NMOCD INTER-OFFICE CORRESPONDENCE

TO: File of C & C Landfarm
From: Wayne Price-Environmental Engineer *Wayne Price*
Date: March 22, 1996
Reference: Field Report
Subject: Witness MW Installation.
C&C Rep. Eddie Seay
Auger Air-Driller

Comments:

Arrived on site approx. 10:30 am, MW # 8 already drilled. Rig was completing MW # 7, took picture. Witness drilling MW #6 & took pictures.

Rotary air rig using 6 1/2 " bit.

0-5 ' top soil
5-10' calichie
10-11' sand & gravel calcareous white powder
12-16' calichie powder with nodules
17-19' fine white calcareous sand
19-25' sand, calichie, clay(10%)
25-27 Red bed Clay-Hard chips- took sample- Hydrated with water
became very plastic
clay.

Witness putting in 3" sch 40 PVC cemented pipe. Took picture of perforated pipe. This was done by hand by drilling approx. 1/16" holes in pipe. Holes averaged 10-13 per foot of pipe. Total of 5 feet.

cc: Jerry Sexton-NMOCD District I Supervisor

attachments-4 pictures

**RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION**

**JAMES E. (JIM) NUGENT, Chairman
MARY SCOTT NABERS, Commissioner
BARRY WILLIAMSON, Commissioner**



**DAVID M. GARLICK
Director
LORI WROTEMBERY
Director of
Environmental Services
(512) 463-6790
Fax (512) 463-6780**

1701 N. CONGRESS

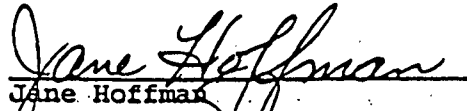
P. O. BOX 12967

AUSTIN, TEXAS 78711-2967

September 27, 1993

NOTICE OF RULE ADOPTION

Attached is a copy of Statewide Rule 91 (16 TAC §3.91, Cleanup Standards for Spills of Crude Oil into Soil) adopted by the Railroad Commission of Texas on September 27, 1993. The Commission has established numerical standards and procedures for the cleanup of crude oil spills into non-sensitive areas. The rule becomes effective November 1, 1993.


Jane Hoffman
Staff Attorney
Environmental Services Section

INTRODUCTION

The Railroad Commission of Texas (commission) adopts new §3.91 (Rule 91) relating to the cleanup of spills of crude oil from oil and gas exploration and production activities, including transportation by pipeline, with changes to the proposed text published in the March 30, 1993 issue of the Texas Register (18 Tex Reg 1985). The section establishes the standards and procedures for the cleanup of crude oil spills into soil. The section is adopted to prevent the pollution of surface and subsurface waters of the state.

With this section, the commission intends to provide a standard to be applied to crude oil spills into non-sensitive areas. The commission intends to set the standards for cleanup, but to allow flexibility in the choice of method used to achieve the final cleanup level. For those spills that occur after the effective date of this section, the section replaces the Interim Guidelines for Cleanup of Soil Contaminated with Crude Oil from a Spill Incident.

Most commenters accepted the basic premise of different cleanup standards for environmentally sensitive and non-sensitive areas, although some criticized the scope of the proposed rule either as over-inclusive or under-inclusive. One commenter disagreed with a regulatory division between sensitive and non-sensitive areas on the basis that designating sensitive areas and applying different cleanup standards for these areas is arbitrary and subject to interpretation.

3737
(C17)

The commission considered the wide range of environmental situations into which crude oil is spilled and the difficulty in designing cleanup standards appropriate for each situation. The commission believes that the best approach is to develop a standard for those areas with common characteristics; however, because of the complex and sometimes fragile nature of environmentally sensitive areas, the commission believes the appropriate cleanup level for these areas should be based on site-specific criteria.

These proposed standards and procedures do not apply to spills into sensitive areas, which present unique circumstances and are often fragile. Sensitive areas are those areas with factors that cause them to be more vulnerable to pollution and, therefore, may require more stringent cleanup standards or procedures. Factors that might characterize an area as sensitive include proximity to surface water; proximity to wildlife refuges or residential areas; or the existence of shallow ground water or possible pathways for communication with deeper ground water. Spills of crude oil into sensitive areas will be handled on a case-by-case basis and not by rule.

Some commenters suggested clarifications of or additions to the list of factors. The commission believes that the list of factors permits a common sense determination of those areas that might be considered environmentally sensitive. The commission also believes it would be arbitrary to try to define these factors for the entire State of Texas. The commission will

provide guidance for determining whether a given area is environmentally sensitive.

A number of commenters ask for guidelines in the rule for managing spills in environmentally sensitive areas because these areas should receive greater consideration. One commenter states that these guidelines should address notification, emergency response, monitoring, reporting, coordination with commission staff, and risk assessment protocols. The commission believes that providing guidance for cleaning up crude oil spills in environmentally sensitive areas is more appropriately addressed through separate guidelines than through a rulemaking initiative.

Some commenters insisted that the responsible party seek a determination from commission staff as to whether the area of contamination is in an environmentally sensitive area prior to cleanup. Response activities must be initiated by the operator immediately upon discovery of any crude oil spill. The commission will make the initial determination with the responsible operator as to whether the spill is in an environmentally sensitive area. The final determination in the event of any question will be made by the commission.

A couple of commenters suggested that hydrocarbon condensate be included in the definition of crude oil. Hydrocarbon condensates or the liquids produced in association with natural gas exhibit a greater mobility in the subsurface than crude oil because of their lighter density and higher solubility. Hydrocarbon condensate also typically contains a greater

proportion of benzene than crude oil. For these reasons, hydrocarbon condensate poses a greater hazard to surface and subsurface water than does crude oil. Therefore, the section was revised to clarify that this section does not apply to hydrocarbon condensate spills, which will be handled on a case-by-case basis.

Several commenters expressed concern about past spills of crude oil. A couple of commenters were concerned that new spills or spills that occur after the effective date of the section onto past spill areas would require cleanup of a larger area of contamination than was anticipated by the section. One commenter suggested that where the contamination is due in part to past spills and in part to new spills, the cleanup standard will be determined according to which type of spill caused the majority of the contamination. Another commenter suggested that cleanup of these sites should be handled on a case-by-case basis. The commission has revised the section to clarify that it will not be applied retroactively and that, for those spill areas that are a mixture of past spills and new spills, the cleanup standards will be determined by the commission on a case-by-case basis. Operators are expected to contact the district office for direction in cleaning up these spill areas.

One commenter claimed that past spills frequently form "hard-pan" or a compacted oily soil cover that acts as a seal to prevent further contamination. In the experience of the

commission, the "hard-pan" soil does not create an even seal and, therefore, is an imperfect protective cover. Furthermore, significant contamination of soil and water have been discovered beneath such "hard-pan" areas.

Several commenters asked that de minimis spills and spills within fire walls or bermed areas around tanks be exempted, while another commenter recommended that cleanup of de minimis spills be deferred until after site abandonment. To exempt these spills or to delay their cleanup until after abandonment of the site defeats the reason for the section. Continual small drips and leaks can add up to a large volume of contaminated soil, which may pose a threat to surface and subsurface water.

One commenter asserts that a case-by-case determination of cleanup standards fails to provide the regulated community with clarity or certainty about government's expectations for cleanup and does not provide a uniform standard of cleanup. The commission believes that numerical criteria are appropriate for those types of spills that may require less monitoring by regulators than spills into environmentally sensitive areas. Response and remediation of spills in sensitive areas need to be individually tailored to each unique spill site to ensure that cleanup is adequate to protect human health and the environment. Remediation actions on these spills are expected to be more closely monitored by the commission. Cleanup levels tailored to the specific site are actually more protective of the environment

because factors unique to the site can be considered.

Several comments emphasize the need for immediate action in responding to a crude oil spill to avoid extensive contamination of soil or water while another asks for daily monitoring of a spill location for the presence of free oil. With regard to the requirement to begin cleanup by removing free oil, other commenters suggest changing "immediate" to "as soon as practicable," "as soon as possible," or "as soon as feasible." One commenter claims that a reasonable time frame of one week after discovery to remove free oil is sufficiently "immediate."

The commission is aware of the remote location of many oil and gas facilities and of industry practice regarding the frequency of visits to those locations. "Immediate" is intended to mean that action will be initiated at the time of discovery without delay. The commenter's suggestion that a reasonable time to commence removal of free oil is one week after discovery is not reasonable to the commission. Any free oil may well have soaked into the ground in a week's time.

Several commenters suggested using a visual or olfactory standard for determination of the extent of contamination. Any method of delineation may be used, whether visual, olfactory, or analytical testing, provided that sufficient training and corroborative testing has been performed to assure the alternative method will yield a result that is consistent with laboratory testing.

A number of commenters asked that in-situ bioremediation (bioremediation in place without excavation) be permitted. One commenter believes the section creates the impression that other technologies like low temperature thermal stripping are not allowed.

The commission intends to set the standards for cleanup, but to allow flexibility in the choice of method used to achieve the final cleanup level. A number of methods exist to achieve the final cleanup level including natural or enhanced bioremediation; thermal treatment, incineration or other heat-driven process; and solvent extraction. Although the section contains specific requirements for bioremediation, it allows for the use of any remediation method as long as all of the other requirements of the section can be met.

The commission has added a new subsection (f) to the section to clarify that alternative standards and procedures may be approved if they are equally protective of the environment.

Some commenters questioned the 1.0% total petroleum hydrocarbon cleanup level as overly stringent while others questioned the cleanup level as too lenient. Other commenters supported the 1.0% cleanup level. Still other commenters stated that the commission's cleanup standards for cleanup of crude oil spills should be the same standards as those used by other federal and state agencies.

While other state or federal agencies have developed cleanup

standards for soil contaminated by refined petroleum products, there are no cleanup standards specifically developed for the cleanup of soil contaminated by crude oil spills. The commission considered data on the physical and chemical properties of crude oil and refined petroleum products, studies evaluating action levels for crude oil contaminated soil, Interstate Oil and Gas Compact Commission guidelines for landfarming, American Petroleum Institute guidelines for management of oil and gas waste, and the commission's own experience with spills of crude oil in the development of this section. Based on this information, the commission believes that the 1.0% cleanup level for soil contaminated by crude oil spills is protective of the environment in non-sensitive areas.

Two commenters complained that mixing soil contaminated with crude oil with other soil is dilution and, therefore, an inappropriate procedure for bioremediation. The commission believes that the addition of native soils is a cost effective mechanism to arrive at an appropriate loading rate to begin the bioremediation process.

Several comments expressed concern about sampling protocols and testing for contamination. The commission believes that mandating a specific analytical method or sampling protocol to apply across a wide variety of spill scenarios reduces flexibility and can provide an incorrect determination if an inappropriate method is selected. The commission believes that

sampling protocols should be tailored to the particular site, and the commission acknowledges that there are a variety of standards. Guidance regarding preferred sampling protocols and testing procedures will be provided through agency guidelines.

Some commenters were concerned that the one-year time limit for completion of bioremediation would be too short while other commenters insisted that six months was an appropriate time limit for bioremediation. The commission believes that achieving a 1.0% total petroleum hydrocarbon cleanup is ordinarily possible within three to six months; therefore, the one-year limit includes an additional margin for unforeseen problems. Operators who choose bioremediation are expected to take all steps necessary to ensure that bioremediation is completed as soon as technically feasible. In extraordinary circumstances where more than one year might be necessary for completion of the bioremediation process, an operator may submit a written request for extension to the district office. Under the provisions of the new subsection (f), the request for extension must include a complete explanation of why an extension is necessary, and the steps that will be taken to ensure that the bioremediation process is completed as quickly as technically feasible.

One commenter suggested the requirement for reporting crude oil spills to "water" be changed to "waters of the U.S." The commission intends for all crude oil spills to water, whether surface or subsurface, be immediately reported to the commission.

One commenter asked for clarification of the reporting requirement while a couple of commenters asked that spills less than five barrels of oil be reported to the commission. The commission expects operators to report all spills of crude oil exceeding five barrels of oil, which means total volume spilled and not net volume spilled. The commission believes that the increased administrative burden that reporting crude oil spills less than five barrels would entail is not warranted. The requirement for immediate reporting of all crude oil spills into water addresses the issue of pollution to water.

Several commenters requested that commission form H-8 relating to the reporting of spills be modified to incorporate the reporting requirements of subsection (e)(1). The commission will amend its form H-8 to reflect the reporting requirements of this section.

A couple of commenters thought that the reporting requirements of subsection (e) of this section would delay submission of the Form H-8 because operators could not wait to certify that all soil had been brought to the surface for remediation and properly mixed to the appropriate loading rate and still meet the commission's deadlines for spill reporting under 16 TAC §20. The commission notes that the instructions printed on Form H-8 state that immediate notification is to be given first by telephone or telegraph followed by the filing of the Form H-8 "when appropriate measures have been taken." The

certification requirements are not contingent upon completion of bioremediation. Excavation and mixing should take place as quickly as possible and should not unduly delay the filing of form H-8.

Some comments indicated that additional reporting requirements for spills over 10 barrels are unnecessarily burdensome. The commission agrees with the commenters and will change the requirement for a final report for crude oil spills over 10 barrels to crude oil spills over 25 barrels.

Other commenters thought that the section should include requirements for spill prevention and response plans, pipeline construction, produced water or salt water spills, and penalty provisions. The commission notes that the statutory penalty provisions that apply to the commission's other sections will apply to this section as well. This section is intended to address spills of crude oil into non-sensitive areas and not any of the other issues raised by these comments, which are more appropriately addressed either by other state and federal agencies' requirements for spill prevention and response plans or other regulations of the commission. Spills of produced water or salt water are more appropriately addressed in a separate rulemaking.

The commission intends this section to be interpreted and implemented in a manner consistent with other commission rules. Other federal or state laws may also apply to spills of crude oil

and should be consulted for additional guidance.

Commenters for the section are: West Central Texas Oil & Gas Association, Holliday Environmental Services, Inc., Permian Basin Petroleum Association while the following commenters are in favor of the section with modifications: Texas Mid-Continent Oil & Gas Association, North Texas Oil and Gas Association, Amoco Production Company, Texas Independent Producers and Royalty Owners Association.

The new section is adopted under Texas Natural Resources Code, §91.101, which provides the commission with the authority to prevent pollution of surface or subsurface water in the state from the exploration, development, or production, including transportation, of oil, gas, or geothermal resources, and under Texas Natural Resources Code, §85.042, which authorizes the commission to make and enforce rules pertaining to field operations that pose a danger to life or property.

§3.91 (Rule 91) Cleanup of Soil Contaminated by a Crude Oil Spill.

(a) Terms. The following words and terms, when used in this section, shall have the following meanings, unless the context clearly indicates otherwise.

(1) Free oil--the crude oil that has not been absorbed by the soil and is accessible for removal.

(2) Sensitive areas--these areas are defined by the presence of factors, whether one or more, that make an area

vulnerable to pollution from crude oil spills. Factors that are characteristic of sensitive areas include the presence of shallow ground water or pathways for communication with deeper ground water; proximity to surface water, including lakes, rivers, streams, dry or flowing creeks, irrigation canals, stock tanks, and wetlands; proximity to natural wildlife refuges or parks; or proximity to commercial or residential areas.

(3) Hydrocarbon condensate--the light, hydrocarbon liquids produced in association with natural gas.

(b) Scope. These cleanup standards and procedures apply to the cleanup of soil in non-sensitive areas contaminated by crude oil spills from activities associated with the exploration, development, and production, including transportation, of oil or gas or geothermal resources as defined in §3.8(a)(30) of this title (relating to Water Protection). For the purposes of this section, crude oil does not include hydrocarbon condensate. These standards and procedures do not apply to hydrocarbon condensate spills, crude oil spills in sensitive areas, or crude oil spills that occurred prior to the effective date of this section. Cleanup requirements for hydrocarbon condensate spills and crude oil spills in sensitive areas will be determined on a case-by-case basis. Cleanup requirements for crude oil contamination that occurred wholly or partially prior to the effective date of this section will also be determined on a case-by-case basis. Where cleanup requirements are to be determined on a case-by-case

basis, the operator must consult with the appropriate district office on proper cleanup standards and methods, reporting requirements, or other special procedures.

(c) Requirements for cleanup.

(1) Removal of free oil. To minimize the depth of oil penetration, all free oil must be removed immediately for reclamation or disposal.

(2) Delineation. Once all free oil has been removed, the area of contamination must be immediately delineated, both vertically and horizontally. For purposes of this paragraph, the area of contamination means the affected area with more than 1.0% by weight total petroleum hydrocarbons.

(3) Excavation. At a minimum, all soil containing over 1.0% by weight total petroleum hydrocarbons must be brought to the surface for disposal or remediation.

(4) Prevention of stormwater contamination. To prevent stormwater contamination, soil excavated from the spill site containing over 5.0% by weight total petroleum hydrocarbons must immediately be:

(A) mixed in place to 5.0% by weight or less total petroleum hydrocarbons; or

(B) removed to an approved disposal site; or

(C) removed to a secure interim storage location for future remediation or disposal.

The secure interim storage location may be on site or off site.

The storage location must be designed to prevent pollution from contaminated stormwater runoff. Placing oily soil on plastic and covering it with plastic is one acceptable means to prevent stormwater contamination; however, other methods may be used if adequate to prevent pollution from stormwater runoff.

(d) Remediation of soil.

(1) Final cleanup level. A final cleanup level of 1.0% by weight total petroleum hydrocarbons must be achieved as soon as technically feasible, but not later than one year after the spill incident. The operator may select any technically sound method that achieves the final result.

(2) Requirements for bioremediation. If on-site bioremediation or enhanced bioremediation is chosen as the remediation method, the soil to be bioremediated must be mixed with ambient or other soil to achieve a uniform mixture that is no more than 18 inches in depth and that contains no more than 5.0% by weight total petroleum hydrocarbons.

(e) Reporting requirements.

(1) Crude oil spills over five barrels. For each spill exceeding five barrels of crude oil, the responsible operator must comply with the notification and reporting requirements of §3.20 of this title (relating to Notification of Fire Breaks, Leaks, or Blow Outs) and submit a report on a Form H-8 to the appropriate district office. The following information must be included:

(A) Area (square feet), maximum depth (feet), and volume (cubic yards) of soil contaminated with greater than 1.0% by weight total petroleum hydrocarbons.

(B) A signed statement that all soil containing over 1.0% by weight total petroleum hydrocarbons was brought to the surface for remediation or disposal.

(C) A signed statement that all soil containing over 5.0% by weight total petroleum hydrocarbons has been mixed in place to 5.0% by weight or less total petroleum hydrocarbons or has been removed to an approved disposal site or to a secure interim storage location.

(D) A detailed description of the disposal or remediation method used or planned to be used for cleanup of the site.

(E) The estimated date of completion of site cleanup.

(2) Crude oil spills over 25 barrels. For each spill exceeding 25 barrels of crude oil, in addition to the report required in subsection (e)(1) of this section, the operator must submit to the appropriate district office a final report upon completion of the cleanup of the site. Analyses of samples representative of the spill site must be submitted to verify that the final cleanup concentration has been achieved.

(3) Crude oil spills of five barrels or less. Spills into the soil of five barrels or less of crude oil must be remediated to these standards, but are not required to be reported to the

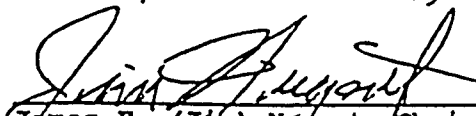
commission. All spills of crude oil into water must be reported to the commission.

(f) Alternatives. Alternatives to the standards and procedures of this section may be approved by the commission for good cause, such as new technology, if the operator has demonstrated to the commission's satisfaction that the alternatives provide equal or greater protection of the environment. A proposed alternative must be submitted in writing and approved by the commission.

This agency hereby certifies that the section as adopted has been reviewed by legal counsel and found to be a valid exercise of the agency's legal authority.


Issued in Austin, Texas on September 27, 1993.

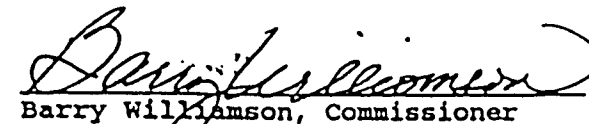
ATTEST:


James E. (Jim) Nugent, Chairman
Railroad Commission of Texas


Secretary


Mary Scott Nabers, Commissioner
Railroad Commission of Texas


Mary Ross McDonald
Assistant Director
Legal Division - Gas Utilities/LP Gas
Railroad Commission of Texas


Barry Williamson, Commissioner
Railroad Commission of Texas

For further information, call Jane Hoffman at (512) 463-6857.

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

JAMES E. (JIM) NUGENT, Chairman
MARY SCOTT NABERS, Commissioner
BARRY WILLIAMSON, Commissioner



DAVID M. GARLICK
Director
LORI WROTENBERY
Director of
Environmental Services
(512) 463-6790
Fax (512) 463-6780

1701 N. CONGRESS

P. O. BOX 12967

AUSTIN, TEXAS 78711-2967

**PERMIT TO RECEIVE, STORE, HANDLE, TREAT AND DISPOSE OF
CERTAIN NONHAZARDOUS OIL AND GAS WASTES**

Landtreatment Permit No. LT-0136
Amends Permit Issued August 16, 1993

RCM Oil, Inc.
24 Smith Road, Suite 185
Midland, TX 79705

Based on information contained in your application dated March 29, 1993 and subsequent information submitted you are hereby authorized to receive, store, handle, treat, and dispose of certain non-hazardous oil and gas wastes as specified below at the following facility:

Ricky Smith Ranch
100-Acres
Section 14, Block B-5, P.S.L. Survey
Winkler County, Texas
RRC District 08

This authority is granted in accordance with Statewide Rule 8 and subject to the following minimum conditions:

I. GENERAL PERMIT CONDITIONS:

- A. The effective date of this permit is September 16, 1993.
- B. The authority granted by this permit expires on July 30, 1995.
- C. This permit may be considered for administrative renewal upon review by the Commission.
- D. This permit is not transferable without the consent of the Commission. Any request for transfer of this permit must be filed with the Director of Environmental Services at least 60 days before the permittee wishes the transfer to take place.

*Texas
Permitted Landfarm*

- E. This permit does not authorize the discharge of any oil or gas waste from the facility.
- F. The permittee shall make all records available for review and/or copying during normal business hours upon request of Commission personnel.
- G. Failure to comply with any provision of this permit shall be cause for modification, suspension or termination of this permit. This permit may be canceled if the Director of Environmental Services determines that the facility is in violation of the conditions of this permit or if operation of the facility is causing or allowing pollution of surface or subsurface water.

II. INCOMING WASTES:

A. AUTHORIZED WASTES:

Only nonhazardous, crude oil contaminated soil from spills subject to the jurisdiction of the Railroad Commission of Texas may be received, stored, handled, treated or disposed of at the facility.

No waste may be received or disposed of at the facility if it is not a waste under the jurisdiction of the Railroad Commission of Texas. No hazardous waste as defined by the U.S. Environmental Protection Agency in 40 CFR Part 261 or industrial waste may be received or disposed of at the facility.

No wastes may be disposed of at the facility if that material is reclaimable.

B. TESTING REQUIREMENTS AND CRITERIA FOR INCOMING WASTES:

1. Prior to receipt at the facility, representative samples shall be obtained for each spill site. One composite sample for every 50 cubic yards of contaminated soil must be obtained. The composite sample shall be comprised of at least four (4) separate grab samples from within the 50 cubic yards with the purpose of obtaining a composite sample representative of the 50 cubic yards.
2. All composite samples from each spill site shall be analyzed for electrical conductivity (EC) and total petroleum hydrocarbons (TPH).
3. In addition to the analysis required in II.B.2 above, crude oil contaminated soils resulting from spills from transmission lines, transport vehicles, or other crude oil contaminated soil that is not exempt from federal hazardous waste regulation under 40 CFR 261 shall be analyzed for TCLP metals and TCLP benzene.

4. The crude oil contaminated soil to be accepted at the facility may not exceed the following limits for the parameters, depending on the parameters required for analysis in II.B.2 and II.B.3 above:

<u>PARAMETER</u>	<u>LIMIT</u>
Electrical Conductivity (EC)	4 mmhos/cm
TPH	10 wt. % (100,000 ppm)
TCLP Metals:	
Barium	< 100.00 mg/l
Chromium	< 5.00 mg/l
Lead	< 5.00 mg/l
Silver	< 5.00 mg/l
Arsenic	< 5.00 mg/l
Cadmium	< 1.00 mg/l
Mercury	< 0.2 mg/l
Selenium	< 1.00 mg/l
TCLP Organics:	
Benzene	< 0.5 mg/l

5. The permittee shall maintain the following records on each load of waste received at the facility for a period of three (3) years from the date of receipt:
- description of the site where the waste was generated, including:
 - generator name;
 - lease name and number or gas ID;
 - county.
 - carrier name;
 - amount of waste material received (specify units);
 - type of waste and description of waste material, including any analyses required by subsection II.B. above; and
 - the cell in which waste load was placed.

6. A quarterly summary of waste receipts shall be submitted to the Director of Environmental Services in Austin. This summary shall include the volume of each type of waste material received on a monthly basis. This report shall be due 25 days after the end of each quarter.

III. GENERAL FACILITY DESIGN:

- A. The general layout and arrangement of the facility shall be consistent with the guidelines submitted.
- B. **SECURITY:** Prior to beginning operations the facility shall have security to prevent unauthorized access. Access shall be secured by a locked gate when the facility is unattended. Only employees of the permittee may have a key to the lock.

IV. LANDTREATMENT AREA:

A. CONSTRUCTION OF LANDTREATMENT AREA:

1. The landtreatment area shall be constructed in a rotating plot configuration consisting of eleven (11) cells of five (5) acres each, for a total of 55 acres. These cells shall be arranged and numbered as indicated on the "Facility Site Plan," Permit Appendix A.
2. The landtreatment cells shall be separated using levees to partition waste in the individual cells. These levees shall be keyed into the underlying soil, and constructed and maintained to a minimum height of two (2) feet and width at base of at least six (6) feet.
3. The landtreatment areas shall be designed with a slope of 0.2 percent to direct runoff from the landtreatment areas to facilitate removal of rainwater.
4. A perimeter levee shall be constructed to surround the entire landtreatment area. This levee shall be keyed into the underlying soil and shall be constructed to a minimum height of three (3) feet and a minimum width at base of nine (9) feet.
5. Run-on shall be controlled and diverted around the landtreatment plots.
6. Off-load ramps shall be constructed for the landtreatment areas.

B. LANDTREATMENT AREA OPERATION

1. A freeboard of at least one (1) foot must be maintained between the level of the waste in the landtreatment cells and the top of the cell levees.
2. The TPH content in the treatment cell after discing shall not exceed five (5) weight percent in the treatment zone.
3. The contaminated soil shall be applied evenly over the treatment cell to a maximum thickness of 12 inches per application and shall be thoroughly tilled into the soil immediately after application. The thickness of the waste application allowable depends on the TPH content of the waste.
4. The treatment zone shall be tilled weekly until the total petroleum hydrocarbon (TPH) content is reduced to one (1) weight percent or less. Quarterly tilling shall be performed thereafter until a TPH concentration of 0.1 weight percent or less has been achieved.
5. Fertilizer may be added as required to maintain optimum C:N:P ratio. Any other soil amendments or treatment chemicals must be approved by the Director of Environmental Services prior to use on the landtreatment area.
6. Any spills of waste or any other materials shall be promptly cleaned up or disposed of in an authorized manner.

C. LANDTREATMENT AREA MONITORING

1. For the purposes of monitoring and sampling the soils, the following definitions will be employed:

SOIL CORE SAMPLING DEPTHS -- TREATMENT ZONES

<u>Treatment Zone</u>	<u>Zone Depth</u>
Surface Treatment Zone (STZ)	0 - 2"
Upper Waste Treatment Zone (UWTZ)	> 2" - 6"
Lower Waste Treatment Zone (LWTZ)	> 6" - 12"
Compliance Monitoring Zone (CMZ)	> 12" to 24"

2. Six (6) randomly selected core samples from each treatment cell shall be collected using standard approved sampling and collection procedures. A minimum of one (1) grab sample shall be obtained from each of the four treatment zones in each core. The samples from each treatment zone shall be composited to obtain one composite sample for each of the four treatment zones.
3. The composite samples for each of the four treatment zones shall be analyzed as follows:

<u>Sampling Frequency</u>	<u>Zone</u>	<u>Parameters to be analyzed</u>
Once for baseline prior to waste application	STZ CMZ	pH, EC, SAR, CEC, TPH, prior to waste soluble anions and cations, and total metals (mg/kg): Ag, As, Ba, Cd, Cr, Pb, Hg, Se, Zn
Quarterly	STZ LWTZ	TPH, EC
Semi-annually thereafter	STZ UWTZ LWTZ CZM	pH, EC, SAR, CEC, TPH, soluble anions and cations, and Total metals (mg/kg): Ag, As, Ba, Cd, Cr, Pb, Hg, Se, and Zn

4. The Midland District Office shall be notified at least 48 hours prior to any sampling event.
5. An annual data interpretation and summary shall be submitted to the Director of Environmental Services and the Midland District Office.

V. FACILITY CLOSURE:

A. CLOSURE OF LAND TREATMENT AREA

1. Prior to commencing closure of any landtreatment cell, composite samples as described in Condition #IV.C.2. of this permit shall be obtained from each treatment zone. These composite samples shall be analyzed and the following constituent levels shall not be exceeded:

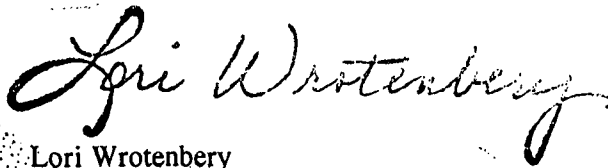
PARAMETER	PRE-CLOSURE LIMIT
pH (Standard Units)	6 to 10
Electrical Conductivity (EC) (mmhos/cm)	4
Sodium Absorption Ratio (SAR)	< 12
TPH (weight %)	< 0.1
Metals (mg/kg):	
Arsenic	10
Barium	2000
Cadmium	10
Chromium	500
Lead	500
Mercury	10
Selenium	10
Silver	200
BTEX (mg/kg)	30

2. When acceptable soil constituent levels have been verified, the levees of the landtreatment cells shall be leveled and the treated soils spread over the surrounding area. The topsoil shall then be contoured and seeded with appropriate vegetation.
- B. The contents of all vessels, tanks, sumps, or other containers shall be disposed of in an authorized manner.
 - C. Provisions shall be taken to prevent erosion both during and following closure.

- D. The Director of Environmental Services and the Midland District Office must be notified in writing 45 days prior to commencement of closure activities.

This authorization is granted subject to review and cancellation should investigation show that such authorization is being abused.

Sincerely yours,

A handwritten signature in cursive script, reading "Lori Wrotenberg".

Lori Wrotenberg
Director of Environmental Services

NOTE: Amended Condition II, B.2.
to delete BTEX testing, Condition II, B.3.
to analyze all non-exempt waste for
TCLP metals and TCLP Benzene, Condition
II.B.4. to clarify TPH limit, and Condition
IV. B.C.3. to amend sampling frequency from
after each application to quarterly.

LW/LLS/JR

attachment (Facility Site Plan)

cc: RRC - Midland

2. Unsaturated Contaminated Soils

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

C+C

<u>Depth To Ground Water</u>	<u>Ranking Score</u>
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source, or;	
<200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	<u>Total Ranking Score</u>		
	<u>>19</u>	<u>10 - 19</u>	<u>0 - 9</u>
<u>Benzene(ppm) *</u>	10	10	10
<u>BTEX(ppm) *</u>	50	50	50
<u>TPH(ppm) **</u>	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 24, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.P-176-012-139

Mr. Jimmie Cooper
C&C Land Farm
Box 55
Monument, New Mexico 88265

**RE: Oil Conservation Division
Request to Expand C&C Landfarm**

Dear Mr. Cooper,

The Oil Conservation Division (OCD) has received C&C Landfarm, Inc.'s (C&C) work plan dated March 23, 1995 proposing to install two monitor wells located 330'/FNL and 50'/FWL, 330'/FSL and 50'/FWL, respectively, of Unit Letter "C", Section 3, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico. The OCD requested the work plan as part of the review of the C&C request to expand the existing facility. The work plan is hereby approved with the following conditions:

1. In addition to the two monitor wells proposed in the work plan, one additional monitor well will be installed to be located 660'/FWL and 50'/FNL of Unit Letter "C", Section 3, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico.
2. The monitor wells (3) will be completed by drilling two feet below the top of the red beds, installing five feet of screen (2' below and 3' above the top of the red bed), placing appropriately sized gravel pack to two feet above the top of the screen, a two foot bentonite seal on top of the gravel pack and grouted to the surface with grout containing 3%-5% bentonite.
3. The OCD will be provided with the surveyed locations and surface elevations of all the monitoring wells, including the five previously installed monitor wells.

Mr. Jimmie Cooper
May 24, 1995
Page 2

4. The OCD will be provided with a final report upon completion of the work plan that will include:
 - a. Detailing all activities included with the implementation of the work plan
 - b. A drillers log of each new monitor well drilled.
 - c. A contour map of the top of the red beds, relative to sea level, using all available geologic information..
 - d. Any conclusions C&C ascertains from the implementation of the work plan.

Submission of the above requested information will allow the OCD review of the proposed facility expansion to continue.

If you have any questions please call me at (505) 827-7153.

Sincerely,



Chris Eustice
Geologist

cc: OCD Hobbs Office, Jerry Sexton
OCD Hobbs Office, Wayne Price

Mr. W. Thomas Kellahin, Esq.
PO Box 2265
Santa Fe, NM 87504-2265

OIL CONSERVATION DIVISION
RECEIVED

March 23, 1995

'95 MAR 24 PM 8 52

NMOCD Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

ATTN: Chris Eustice

Mr. Eustice:

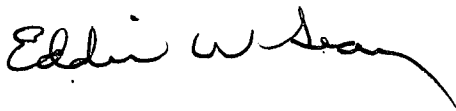
Find within work plan for proposed monitor wells for C & C's expansion request.

We propose to drill 2 wells, located on the West side of the proposed 40 acre site. Well #1 will be located 330/FNL and 50/FWL. Well #2 will be located 330/FSL and 50/FWL. The locations were picked because the surface contour slopes to the West and, from the drilling of the previous monitor wells on the existing site, the redbed also dips westerly.

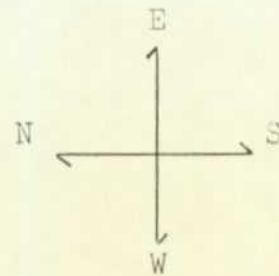
We propose to drill the wells 2 ft. into the redbed, using a 6 1/4" bit, and case wells with schedule 40, 3" OD PVC. The wells will have 5 ft. of screen, 2 ft. below redbed top and 3 ft. above. The screen and 2 ft. above top of screen will have frac sand as a filter pack. A bentonite seal will be put above sand pack, then backfill material will be placed from top of bentonite to within 5 ft. of surface. The top 5 ft. of hole will be cemented to seal off top of hole. Also a locking device will be cemented in place, and a concrete pad at surface. A rotary drilling rig will be used and formations logged. If the OCD approves of our design and placement of wells, C & C is prepared to commence as soon as approval is received.

If additional information is needed or if you have any questions, please call.

Sincerely,



Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88240
(505)392-2236



PROPOSED C & C EXPANSION

40 ACRE

SE 1/4 OF NE 1/4 SECT. 3 T20S R37E

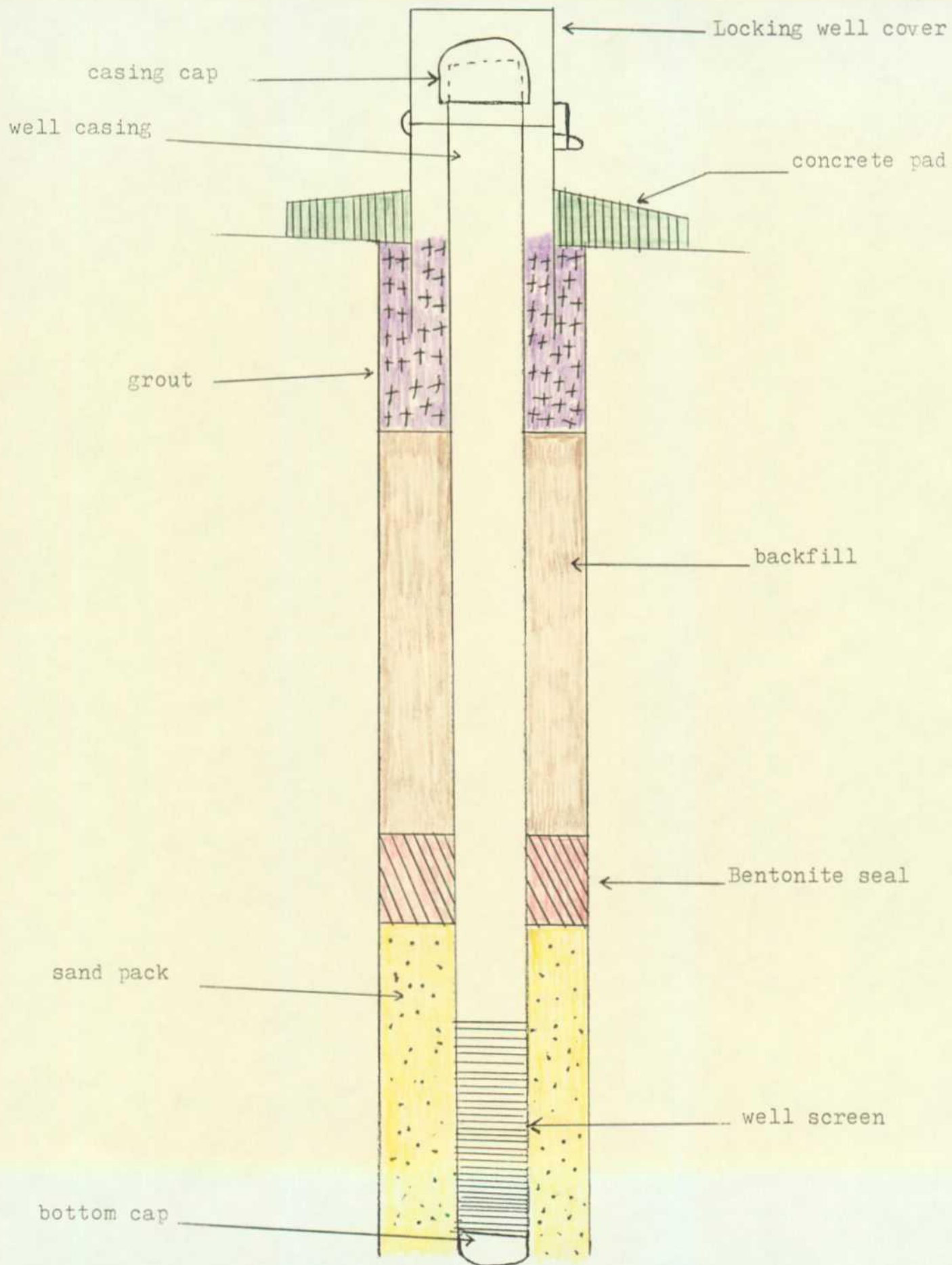
Monitor
Well 1



Monitor
Well 2



PROPOSED MONITOR WELL SCHEMATIC





STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 14, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-116

Mr. Jimmie Cooper
C&C Land Farm
Box 55
Monument, New Mexico 88265

**RE: Oil Conservation Division
Request to Expand C&C Landfarm**

Dear Mr. Cooper,

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced application dated June 15, 1994 and supplemental information dated November 21, 1994 to expand your existing facility located in the SW/4 NE/4 of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico.

The following comments and requests for additional information are based upon the OCD's review of the application and the supplemental information.

1. The OCD requires C & C Landfarm Inc. to install monitor wells at the proposed site to document existing geology and hydrology of the expansion site. Please provide the OCD with a work plan for monitor well installation by April 17, 1995.

Submission of the above requested information will allow the OCD review of the above referenced application to continue.

If you have any questions please call me at (505) 827-7153.

Sincerely,

Chris Eustice
Environmental Geologist

xc: OCD-Hobbs Office, Jerry Sexton
OCD-Hobbs Office, Wayne Price

For Your Files Only

RECORDED - IN DIVISION
RECEIVED

95 JAN 13 PM 8 52

December 30, 1994

SW Cattle Co.
ATTN: Mr. Trent Stradley
P.O. Box 549
Hobbs, NM 88241

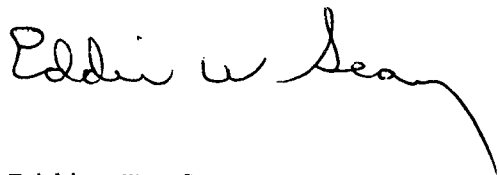
Dear Sir:

As Agent for C & C Landfarm, Inc., I would like to visit with you about the landfarm and its operations. I feel there may be some misunderstanding as to the operation at C & C and what materials can and cannot be taken for remediation. By talking things over, we may be able to resolve some of the problems you may have with C & C.

The first week of January, I will make myself available to you for a meeting. Please call and set a convenient time for you.

Am looking forward to hearing from you.

Sincerely,



Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88240
(505)392-2236

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*

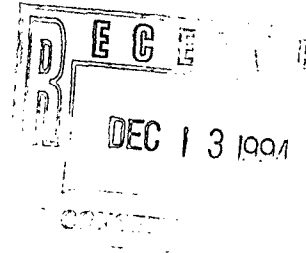
*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

December 13, 1994

HAND DELIVERED



Mr. William J. LeMay
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: REQUEST FOR HEARING AND STATEMENT OF OBJECTIONS
*In the matter of the application of C & C Landfarm, Inc.
for expansion of a commercial surface waste disposal facility,
Lea County, New Mexico.*

Dear Mr. LeMay:

By letter dated November 12, 1994, C & C Landfarm Inc. has provided notice to Trent Stradley that C & C Landfarm Inc. is seeking an expansion of its commercial surface waste disposal facility.

On behalf of W. T. (Trent) Stradley and S-W Cattle Co. and in accordance with Division Rule 711, please find enclosed our referenced Request for Hearing and Statement of Objections which we request be set for hearing before a Division Examiner.

Very truly yours,

W. Thomas Kellahin

w/ Enclosure:

cc: C. Gene Samberson, Esq.

cc: Eddie Seay, agent for C & C Landfarm, Inc.

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

IN THE MATTER OF THE REQUEST
OF C & C LANDFARM, INC. FOR
EXPANSION OF A COMMERCIAL SURFACE
WASTE DISPOSAL FACILITY,
LEA COUNTY, NEW MEXICO

EC 1

DEC 13 1994

**REQUEST FOR HEARING
AND
STATEMENT OF OBJECTIONS
BY
S-W CATTLE CO. AND W. TRENT STRADLEY**

Comes now W. T. (Trent) Stradley and S-W Cattle Co. ("the Opponents") by and through their attorneys, C. Gene Samberson, Esq. and W. Thomas Kellahin, Esq. and object to the New Mexico Oil Conservation Division granting the request of the applicant, C & C Landfarm, Inc. ("C&C"), to expand/modify its existing facility in the NE/4 of Section 3, T20S, R37E, Lea County, New Mexico, and in support states:

INTRODUCTION

On November 12, 1994, by a single page letter with no attachments, C & C Landfarm Inc. attempted to send notice to Trent Stradley, an adjoining property owner, of C & C Landfarm's request to the New Mexico Oil Conservation Division for approval to modify its commercial landfarm facility located in the NE/4 of Section 3, T20S, R37E, NMPM, Lea County, New Mexico by adding an additional 40-acres in the NW/4NE/4 of said Section 3.

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On November 21, 1994, Eddie Seay, as agent for C & C Landfarm Inc, filed an incomplete "Discharge Plan Application" with the NMOCD. No copy of this application was ever served on Trent Stradley.

On December 13, 1994, a search of the New Mexico Oil Conservation Division ("NMOCD") files on the C&C's application were made and copies of all relevant documents were provided by Roger Anderson, Environmental Bureau Chief, New Mexico Oil Conservation Division ("NMOCD-EB"), concerning this application.

(1) FAILURE TO COMPLY WITH DIVISION RULE 711

NMOCD Rule 711 requires that prior to the enlargement or a modification of a commercial surface waste disposal facility, a certified and detailed application for such a modification/enlargement to an existing permit shall be filed with the NMOCD-Santa Fe to be accompanied with attachments addressing some eleven different enumerated items.

A search on December 13, 1994 of the NMOCD files on this matter revealed that the applicant filed an incomplete application dated November 21, 1994. Applicant failed to comply with the Division Rule 711 and its request must be dismissed.

Specifically, C & C Landfarm Inc. has violated Division Rule 711-A(1) because it:

- (a) failed to file a description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility. Note: applicant filed a plat of the existing facility but failed to incorporate the expansion area into the plat;
- (b) failed to attach a description of the materials stored or used at the facility;

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(c) failed to attach a description of the present sources of effluent and waste solids;

(d) failed to attached a description of proposed modification to existing treatment system;

(e) failed to attach a routine inspection and maintenance plan to ensure permit compliance;

(f) failed to attach a contingency plan for reporting and cleanup of spills or releases;

(g) failed to attach a geologic/hydrologic study conducted by a competent expert to demonstrate that disposal of oil field wastes will not adversely impact fresh water. This application was prepared and filed by Eddie Seay who is not a qualified hydrologist/geologist and is incompetent to render any opinions on this subject; and

(h) failed to attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

**(2) OCD-ENVIRONMENTAL REGULATIONS
VIOLATE DUE PROCESS**

The Division is utilizing a complex set of rules and regulations (some of which are contrary to and inconsistent with existing Division rules and regulations) with which to process C&C's application and by which to establish operational regulations for this facility and to monitor compliance.

None of these environmental rules and regulations ever has been properly adopted by the Division. (See NMOCD Rule 1201).

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The NMOCD, by avoiding its public hearing process (See NMOCD Rule 1201 and its general notification procedures (See NMOCD Rule 1207) has allowed its Environmental Bureau to unilaterally promulgate rules and regulations and issue amendments which are disguised as "guidelines" and in doing so has precluded both the oil and gas industry and the public from having meaningful comment, objection and input.

However well intended, such procedures are a violation of procedural due process and have resulted in invalid rules and regulations which the NMOCD is currently applying in this case.

(3) ENVIRONMENTAL BUREAU ACTIONS

The subject facility is being designed by the OCD and not the Applicant and is being permitted without any science or experience to know that it will work. This has been and continues to be a "make it up as you go" process by which the agency designs the facility specifications for the Applicant and then challenges the Opponents to prove them wrong. Such an adversarial role is not the proper role for this agency.

The Environmental Bureau-OCD should function as a reviewing regulatory agency. However, the NMOCD-EB in this case has taken a facilitator's role by providing technical support and assistance to the applicant.

In its efforts to accommodate the requests of a former NMOCD employee, Eddie Seay, consultant for C&C, the Environmental Bureau's actions in this case have impaired and tainted its ability to be perceived as impartial. The methods used by the Division in processing this case violates procedural due process.

This matter should be set for hearing before a Division Examiner in order to afford the Opponents their right to have such matters determined by an impartial hearing examiner.

(4) APPEAL OF ORIGINAL APPROVAL

Commission Order R-9769-A is fatally flawed and is still pending an appeal hearing in State District Court in the Fifth Judicial District for Lea County, New Mexico. Any action on this application to modify/expand this facility must be stayed pending a final decision in Case CIV 93-247.

(5) TWO AQUIFERS TO BE PROTECTED

One of the aquifers at risk is the Stradley Aquifer in the shallow alluvium down slope ("gradient") from the proposed waste facility. The issue is where are the vertical and horizontal limits of that aquifer and its recharge system.

Mr. Stradley, who has been over every part of this "White Break" area for decades, will testify that the original facility and its proposed expansion are located on the northeast edge of a natural topographical depression with his fresh water windmill located in the bottom of that depression and in excess of 30 feet lower than the surface waste facility.

A visual inspection of the surface of the facility allows the observer to infer that the surface topography would increase the risk of contamination to the Stradley Aquifer. The Division's records on this case already contain evidence of an extensive search of the State Engineer's records concerning fresh water wells in the area which show the presence of some forty-six (46) water wells in the area.

Mr. Tim Kelly, an expert hydrologist, will also testify and conclude that the likely direction of contaminant movement from the waste facility will be down gradient along the redbed surface; that there have been no hydrologic studies of the area to determine gradients and therefore no way to know the length of time and distance of travel of the contaminants, that there has been no scientific study of the redbeds and the movement cannot

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be predicted. His point will be that the Division originally should not have approved this facility and cannot approve this expansion/modification until that determination is made.

In addition, the Ogalalla aquifer also is present under the waste facility. If the Division wants to decide this case based upon the presence or absence of the Ogalalla aquifer under the facility, then the fact is the Ogalalla aquifer IS PRESENT UNDER this surface waste facility and the potential risk to that ground water source must be addressed.

**(6) APPLICANT HAS NOT PRESENTED SUBSTANTIAL
SCIENTIFIC STUDY ABOUT THE STRADLEY AQUIFER**

C&C now seeks to expand and modify a facility which was improperly approved by the Division in the first place. It is C&C's burden of proof to demonstrate to the Division that the expansion of this facility will not harm the fresh water aquifer.

C&C has yet to provide evidence of the size, shape and hydrology of the Stradley Aquifer from which the Stradley windmill produces fresh water which continues to be a failure of the Applicant to meet its "Burden of Proof."

The ultimate factual issue for this expansion and its original facility is whether this surface waste facility creates a risk of contamination to the fresh water aquifer from which Trent Stradley's well has produced continuously in excess of forty-five (45) years and is the only fresh water supply for cattle in some nine sections and is referred to herein as the "Stradley Aquifer."

To answer that issue, it is essential for the Division to have proper scientific evidence about the Stradley Aquifer including its size, shape and recharge mechanics. C&C has never submitted such scientific evidence and that failure of evidence is fatal to its case.

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The fact that the Applicant did not find the Stradley Aquifer with some five shallow monitor wells drilled on the proposed facility does not substitute for a proper hydrologic study to determine the risk to the Stradley Aquifer. Contaminates can be introduced on the surface and with the introduction of rain will percolate into the ground both vertically and horizontally and migrate into the Stradley Aquifer.

Nobody knows how the Stradley Aquifer is recharged and from what source. Nobody knows the size and shape of the Stradley Aquifer. The Division up until now has ignored that absence of evidence and in doing so, failed to decide the ultimate issue in this case.

It is the Applicant's Burden of Proof and not the NMOCD or the Opponents' burden, to produce the hydrologic study of the Stradley Aquifer which must provide convincing evidence that no risk was being imposed upon the Stradley Aquifer by this waste facility.

**(7) APPLICANT HAS NOT PRESENTED ANY
PROPER SCIENTIFIC STUDY ABOUT THE
EXPANSION OF THIS FACILITY**

C&C has submitted no scientific data on soils tests and therefore no compaction data, no composition data, and permeability data from which to determine the construction and maintenance standards for the berm. Further C&C does not detail the constructions, maintenance or operations requirements for the berm.

In addition, the Applicant has failed to provide evidence as to any of the following:

- (1) composition samples and tests
- (2) soil samples and tests
- (3) compaction tests
- (4) permeability tests
- (5) Cation Exchange capacity tests
- (6) liquid and plastic tests of the redbeds

- (7) any soil properties tests and data
- (8) any hydrology studies
- (9) any groundwater studies
- (10) any percolation tests or data
- (11) any ground water migration tests/data
- (12) any contaminant mobility tests/data

(8) NEED FOR ADEQUATE HORIZONTAL BUFFER ZONE:

A Buffer Zone is essential but the proper distance must be based upon some site specific scientific reasons to determine what minimum distance is adequate. There is no scientific basis for the distance being 100 foot horizontal setback ("buffer") as recommended by Kathy Brown of the OCD-EB. The adoption of an arbitrary distance for the Buffer Zone without any scientific basis is objected to by the Opponents.

(9) TREATMENT ZONE MONITORING

In Order R-9769-A, a mistake was made when it adopted the OCD-EB proposed conditions concerning the Treatment Zone and its Monitoring. The OCD-EB speculated that the first three feet of native soils will be an adequate "Treatment Zone" and with monitoring will protect ground water.

Again, Kathy Brown, previously testified in support of the adoptions of the OCD-EB conditions was not a qualified expert hydrologist and did not undertake an adequate scientific study to justify its Treatment Zone Monitoring.

The proposed monitoring of the Treatment Zone has no scientific basis for determining its reliability. There is no data from which to determine that the location of the cells in which the contaminated soils will be placed have been located an adequate distance from either the excavated

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pits or from the boundary of the adjoining Stradley property. Nobody knows how frequently to sample and how many samples per acre to take in order to detect contamination in the Treatment Zone.

The OCD-EB Revised Recommendations are inadequate to detect any leaching process of movement of contaminants that could cause the pollution of nearby fresh water supplies.

In summary, should the Division use the former OCD-EB recommendations for this facility, they will be inadequate to provide reasonable protection of the valuable groundwater present in the immediate adjacent tracts.

Any approval of this expansion should correct the inadequacies made in the Order R-9769-A.

(10) OPPONENTS OFFER OF PROOF

The Opponents WILL PRESENT evidence that the granting of this application by the Division will fail to protect human health and the environment and will constitute a risk of contamination of ground water, including the following:

- (a) The Applicant's proposed plan will place at risk shallow water wells located down-dip from the proposed landfarm which will be subject to contamination from seepage of leachate contaminants.
- (b) The Applicant's plan to prevent migration of contaminants down gradient along the redbed surface is inadequate.
- (c) The proposed monitor wells are improperly located and will not afford adequate assurance of detection of contaminants.

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(d) The proposed dike identified in OCD Condition (10) in said Order is insufficient and conditions for compaction and verification are inadequate to stop the mobility of the leachate contaminants.

(e) The composition of the berm is not environmentally safe.

(f) Additional soil tests should be performed on the redbed soil including:

- (1) Falling head permeability tests,
- (2) Soil property tests,
- (3) Cation Exchange Capacity tests,

(g) Applicant needs to perform liquid and plastic tests on the redbeds.

(h) The Applicant's proposed barrier is inadequate for its proposed landfarm.

(i) Applicant's geology is inadequate and fails to include an east-west cross section.

The OCD-Environmental Bureau has previously assumed that the contaminated soils will be kept from any shallow fresh water because of about three (3) feet of native soil is to be used as a "treatment zone."

There is no characterization of the "redbeds." In this area there are the Triassic deposits, probably the Chinle shale, and referred to as the "redbeds." The integrity of this landfarm system is dependent upon the impermeability of the redbeds, but the Applicant has presented no data about the physical characteristics of these deposits, such as cation exchange rates, in-situ permeability, remolded permeability at specified compaction ratios, swelling characteristics, etc. All of these are critical factors that ensure that there would be no migration of leachate along the top of or through the redbeds.

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There are inadequate horizontal and vertical buffer zones surrounding this proposed facility. The configuration of the upper surface of the redbeds in the 40-acre tract has not been defined.

RECOMMENDATIONS

Opponents recommend to the Division that the request to expand/modify this facility be DENIED.

Respectfully submitted,

KELLAHIN AND KELLAHIN,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', written over a horizontal line.

W. Thomas Kellahin, Esq.
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

C. Gene Samberson, Esq.
P. O. Drawer 1599
Lovington, New Mexico 88260
(505) 396-5303

ATTORNEYS FOR OPPOSITION-
W.T. STRADLEY
S-W CATTLE CO.

7/92

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

(Refer to OCD Guidelines for assistance in completing the application.)

- I. TYPE: Commercial Landfarm Facility (Expansion)
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55, Monument, NM 88265
CONTACT PERSON: Eddie W. Seay PHONE: (505) 392-2236
- III. LOCATION: NW /4 NE /4 Section 3 Township 20 Range 37 E.
Submit large scale topographic map showing exact location. Unit B
- IV. Attach the name and address of the landowner of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of all materials stored or used at the facility.
- VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
- IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
- X. Attach a routine inspection and maintenance plan to ensure permit compliance.
- XI. Attach a contingency plan for reporting and clean-up of spills or releases.
- XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIV. **CERTIFICATION**
I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

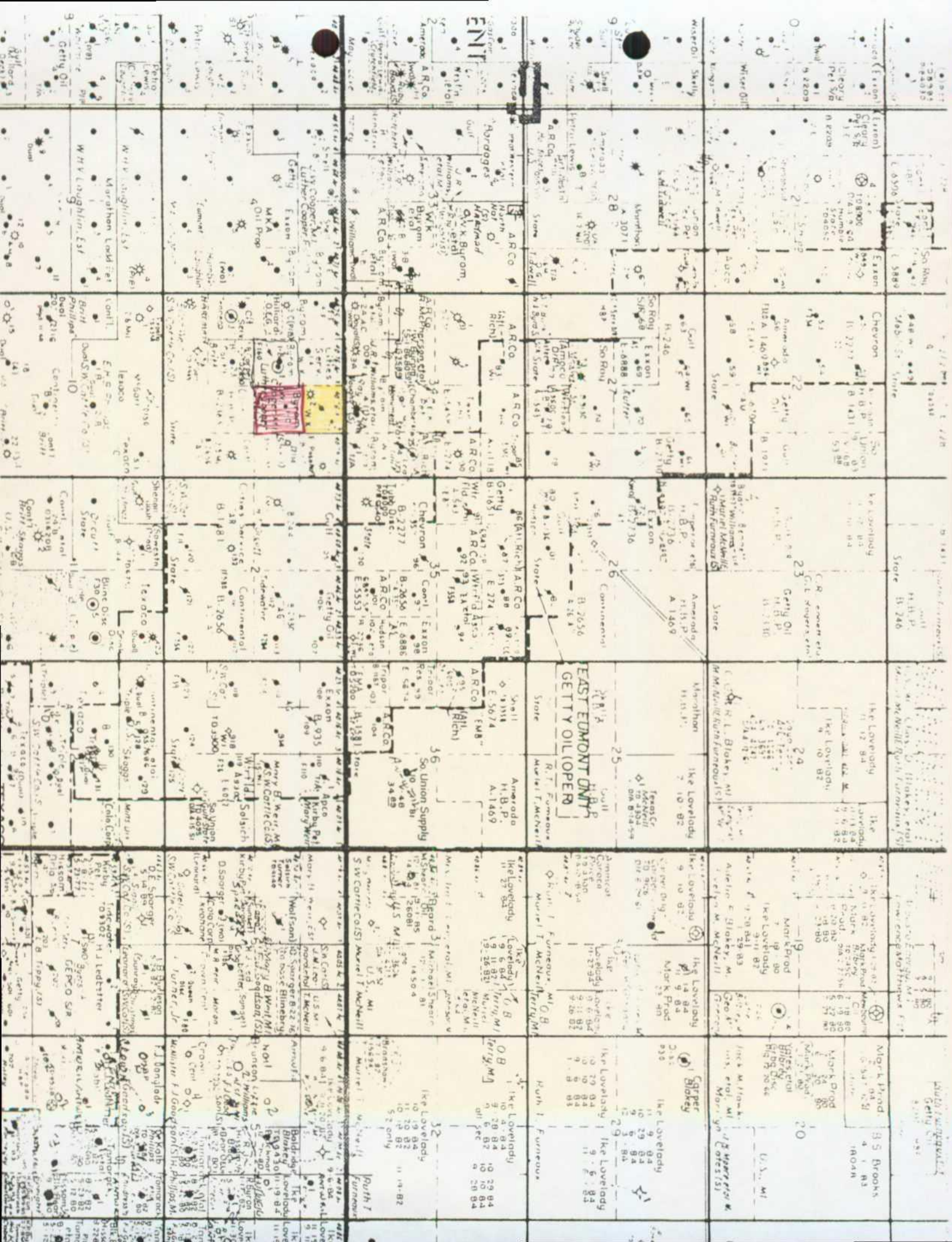
Name: Eddie W. Seay

Title: Agent

Signature: Eddie W. Seay

Date: 11-21-94

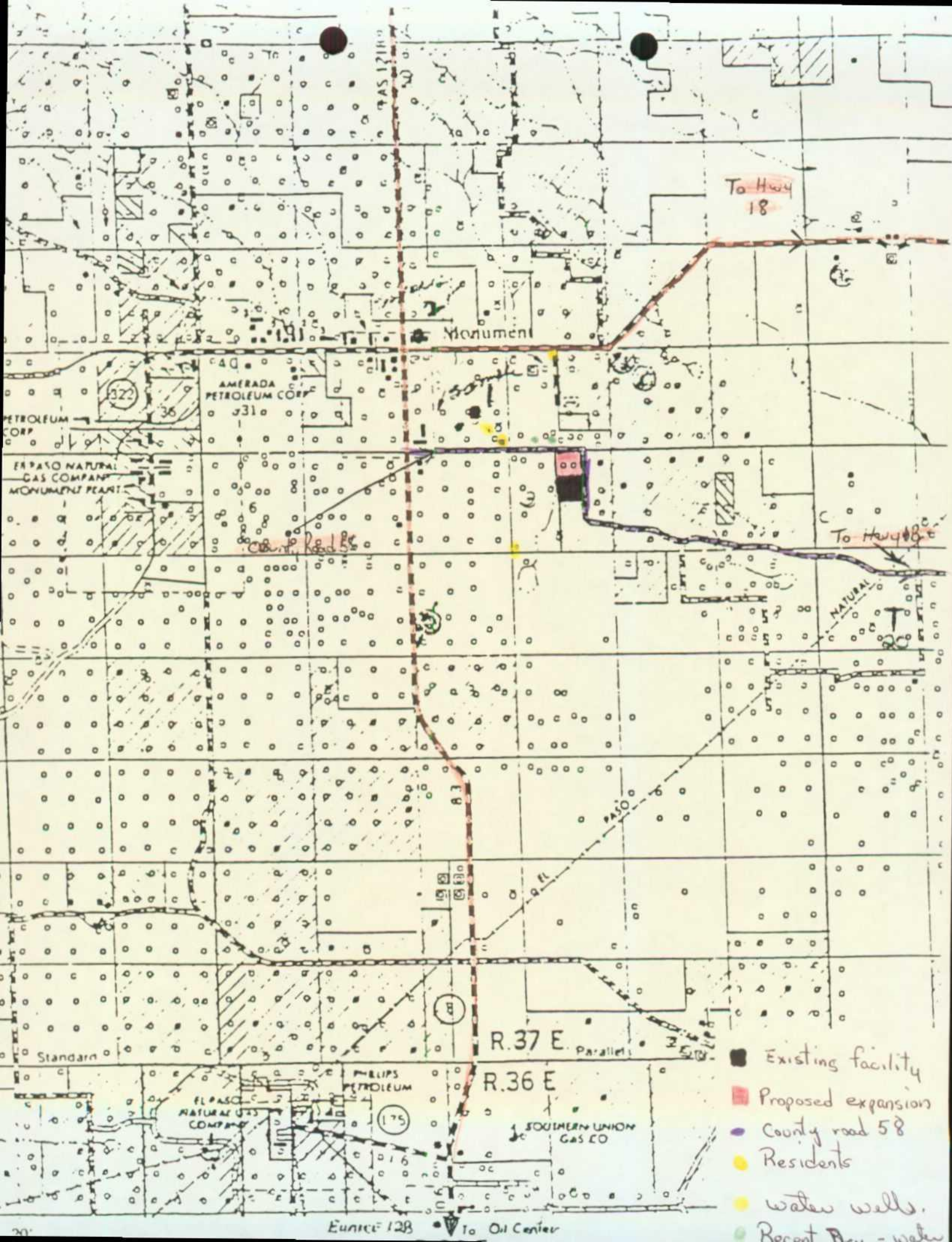
DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.



● Proposed
Expansion

Sect 3 T.20 R37E
Unit B

● Existing Facility



To Hwy 18

Monument

322

AMERADA PETROLEUM CORP

EL PASO NATURAL GAS COMPANY MONUMENT PLANT

County Road 58

To Hwy 80

NATURAL

Standard

R.37 E. parallels

R.36 E.

EL PASO NATURAL GAS COMPANY

PHILIPS PETROLEUM

SOUTHERN UNION GAS CO

Eunice 128

To Oil Center

- Existing facility
- Proposed expansion
- County road 58
- Residents
- water wells
- Recent River - water

List of names and addresses of record of all landowners
within 1/2 mile of the proposed expansion.

SW cattle Co.
P.O. Box 549
Hobbs, NM 88241

Coy R. Doyal
Box 188
Monument, NM 88265

Tanja Weir
711 Greenview Cir.
Sand Springs, OK 74063

Carlyle J. Hall
P.O. Box 163
Monument, NM 88265

Joe R. Williams
Box 215
Monument, NM 88265

Jimmy T. Cooper
Box 55
Monument, NM 88265

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

BLM
P.O. Box 1778
Carlsbad, NM 88221-1778

HYDROLOGY AND GEOLOGY OF PROPOSED SITE

Geographically, the site is situated near the western boundary of the southern extension of the High Plains in southeastern New Mexico. The proposed site is a 40 acre tract located in Unit B Sect. 3, T 20, R 37 E., Lea Co., NM. The site is adjacent to the existing C & C Landfarm which is permitted by the OCD. The site, which is bordered by County Road 58 to the East and North, has a gradual surface slope to the West. The site is situated below the white breaks or caprock area where little or no water is found. Research of State Engineer records and USGS files show no fresh water was recorded or found within the area of review. Two water wells were drilled in Sect. 34 approximately 1/4 to 1/2 miles NW of the proposed site. Both wells, drilled by Van Noy Drilling, were recorded as dry holes with redbeds at 29 ft. The caliche pit in the SE corner of the proposed site was excavated down to the top of the redbed, which came in at approximately 15 ft. No fresh water was found or has run into caliche pit area. The redbed in this area range in thickness from 600 to 1000 ft. from logs of oil wells in the area.

The only water well within the area is a windmill approximately 1 1/4 mile SW of the site. A copy of a recent analysis is within. This well was not listed on State Engineer's list of water wells.

For the past 18 months that C & C has been permitted to operate and monitor its existing facility, no water has been found in the monitor wells or the caliche pits, which are excavated down to top of redbeds, and we have found no water on the proposed site. I feel that without the presence of water and the preventive measures of the trench and berms to prevent runoff and runon of water, and the constant and consistent monitoring of the treatment zone below the proposed site and the existing facility, this should be a safe site for the disposal and remediation of oilfield contaminated soils.



CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

CHEMICAL ANALYSIS OF WATER

Company : Eddie Seay
City, St.: 601 W. Illinois, Hobbs, NM
Proj.Name: C & C Landfarm
Location : Monument, NM

Lab #: H1800
Date Received: 9/20/94
Date Analyzed: 9/21/94

Sample 1 : Stradley Windmill

Units: mg/L

<u>PARAMETER</u>	<u>RESULT 1</u>
pH	7.31
Hardness (CaCO ₃)	588
Calcium (CaCO ₃)	340
Magnesium (CaCO ₃)	248
Sulfate (SO ₄ ⁻)	612
Chloride (Cl ⁻)	668
Total Dissolved Solids	2443
Total Alkalinity	288
Bicarbonate	288
Carbonate	nil

Michael R. Fowler

Date

	LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	BASIN FILE
2	20S 36E 09 13440	10/12/84	434	2350	63F	T0G	L
5	20S 36E 10 32114	08/28/72	79	520		GAL	L
6	20S 36E 10 32114	11/01/76	66	889	66F	GAL	L
7	20S 36E 10 32114	10/19/79	68	880	66F	GAL	L
8	20S 36E 10 32114	10/12/84	92	980	64F	GAL	L
10	20S 36E 11 42243	08/28/72	1000	1450		GAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	GAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	GAL	L
13	20S 36E 11 42243	10/12/84	840	4330	64F	GAL	L
15	20S 36E 15 242421	08/28/72	720	1800		GAL	L
16	20S 36E 15 242421	11/01/76	518	3223		GAL	L
17	20S 36E 15 242421	10/12/84	882	3630	63F	GAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	GAL	L
20	20S 36E 15 24342	03/30/54	1080	6780		T0G	L
21	20S 36E 15 24342	09/09/58	1240	7500		T0G	L
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
26	20S 36E 26 24344	11/08/79	150	1790		T0G	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	T0G	L
29	20S 36E 26 24443	11/08/79	182	1895		T0G	L
31	20S 36E 35 24444	11/08/79	118	1541		T0G	L
33	20S 37E 04 11114	04/02/54	450	2180		GAL	L
34	20S 37E 04 11114	04/22/55	425	2090		GAL	L
35	20S 37E 04 11114	09/09/58	325	1670		GAL	L
37	20S 37E 04 221321	04/22/55	51	758		GAL	L
38	20S 37E 04 221321	09/09/58	47	708		GAL	L
39	20S 37E 04 221321	07/14/77	106	1070		GAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	GAL	L
41	20S 37E 04 221321	2/06/85	81	964		GAL	L
43	20S 37E 05 222144	11/29/79	258	1611		T0G	L
44	20S 37E 05 222144	9/26/84	314	1729		T0G	L
46	20S 37E 07 24331	11/09/79	1268	4232		T0G	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	T0G	L
49	20S 37E 08 244124	11/29/79	868	3734	57F	T0G	L 07620 ES
51	20S 37E 08 423223	10/25/79	520	2396	66F	T0G	L
52	20S 37E 08 423223	9/26/84	886	3806		T0G	L

STATE ENGINEER CHEMICAL QUALITY OF WATER LISTING BY LOCATION

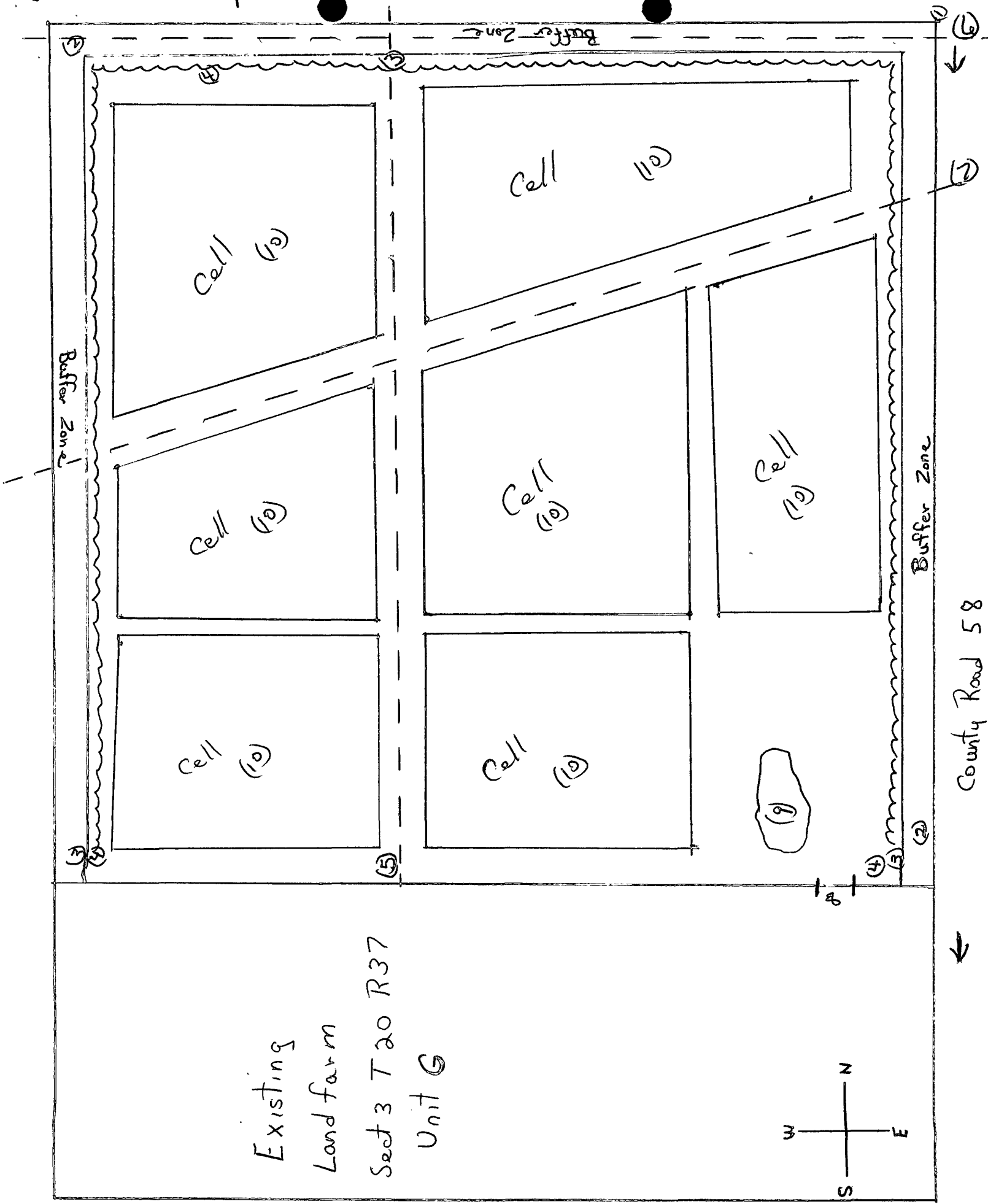
LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	BASIN FILE	REFERENCE FILE	USE	PT
20S 37E 09 112122	11/29/79	176	1256	65F	T06	L		STK	DP
20S 37E 09 33122	10/25/79	584	2543	63F	T06	L		STK	DP
20S 37E 13 32130	11/08/79	68	770		T06	L		STK	DP
20S 37E 16 314141	10/24/79	2350	11696	69F	T06	L		STK	DP
20S 37E 16 314141	2/06/85	2950	12117		T06	L		STK	TS30
20S 37E 19 214144	11/28/79	156	1377	60F	T06	L	L 04410 S	SRO	DP
20S 37E 19 214144	10/03/84	188	1410		T06	L	L 04410 S	SRO	DP
20S 37E 28 24413	11/07/79	1018	5845		T06	L		STK	TANK
20S 37E 28 24413	2/08/85	1000	5971		T06	L		STK	DP
20S 37E 29 34443	11/22/60	295			GAL	L		STK	DP
20S 37E 29 34443	07/14/77	248	1565		GAL	L		STK	TS12
20S 37E 29 34443	11/28/79	296	2525	65F	GAL	L		STK	DP
20S 37E 31 44421	11/08/79	144	1903		T06	L		STK	DP
20S 37E 35 423411	11/08/79	78	948		T06	L		STK	DP
20S 37E 35 423411	2/06/85	66	906		T06	L		STK	TS91
20S 38E 01 34431	05/03/78	57			T06	L		OWD	10
20S 38E 01 34431	05/17/78	82	1033		T06	L		OWD	DP
20S 38E 01 34431	9/25/84	165	1077		T06	L		STK	DP
20S 38E 02 141114	05/17/78	75	954	66F	GAL	L		STK	DP
20S 38E 02 141114	9/25/84	147	1233	68F	GAL	L		STK	DP
20S 38E 02 212211	09/08/65	310	2220		GAL	L	L 02061 S	IRR	DP
20S 38E 02 212211	06/17/77	400	2665	66F	GAL	L	L 02061 S	IRR	DP
20S 38E 02 412422	05/03/78	57			GAL	L	L 03947	STK	DP
20S 38E 02 412422	05/17/78	52	753	66F	GAL	L	L 03947	STK	DP
20S 38E 02 412422	2/14/85	96	950	64F	GAL	L	L 03947	STK	DP
20S 38E 06 143121	11/08/79	100	1047		T06	L		DOM	YT
20S 38E 06 143121	2/13/85	243	1550		T06	L		DOM	YT
20S 38E 08 122224	11/08/79	54	730		T06	L		STK	DP

CONSTRUCTION OF PROPOSED SITE

The 40 acre site which is proposed will be fenced with a barbed wire fence with an entrance from the existing landfarm only. A buffer zone will be kept around facility to divert any runoff from adjacent properties. A berm inside the trench will be maintained as a secondary precaution to prevent runoff or runoff of facility. All cells will be disked and monitored and no cell will be built on an existing pipeline. There will be no buildings or storage of any kind on the facility and only waste approved by OCD will be admitted.

1. 4 strand barbed fence around site
2. Buffer zone
3. Trench - between berm and buffer zone
4. Berm around the perimeter
5. Sid Richardson Pipeline 4 in. gas line buried 36 in.
6. Texas-New Mexico Pipeline 6 in oil line buried 2 ft.
7. Arco Pipeline Co. 4 in oil line buried 36 in.
8. Access from other landfarm only
9. Caliche pit
10. Proposed cells not to exceed 5 acres. All cells will be kept off pipeline.

County Road 58

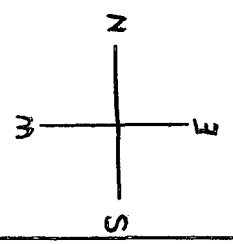


Existing

Land farm

Sect 3 T20 R37

Unit G



County Road 58



November 12, 1994

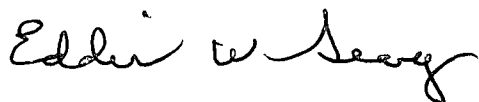
Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that C & C Landfarm, Inc., a State approved disposal facility located in Sect. 3, Township 20, Range 37 E., SW 1/4 of the NE 1/4 Unit G, Lea Co., New Mexico, is filing for expansion to the existing permit. The expansion is a 40 acre tract adjacent to the existing facility on the north side, all on deeded land. The location of the expansion is Unit B the NW 1/4 of the NE 1/4 of Sect. 3, Township 20, Range 37 E., Lea Co., New Mexico. The facility will be for the disposal of oil and gas contaminated soils only.

Any questions concerning the permit or its expansion can be directed to Eddie W. Seay, agent for C & C, (505)392-2236 or Chris Eustice, State of New Mexico Oil Commission, (505)827-5884.

Any complaints or objections must be filed within 30 days of this notice to Chris Eustice, Oil Conservation Commission, State of New Mexico, Box 2088, Santa Fe, NM 87501.

Thank you,



Eddie W. Seay, CEI, CES
601 W. Illinois
Hobbs, NM 88240
(505)392-2236

P L A I N S

H C

T O

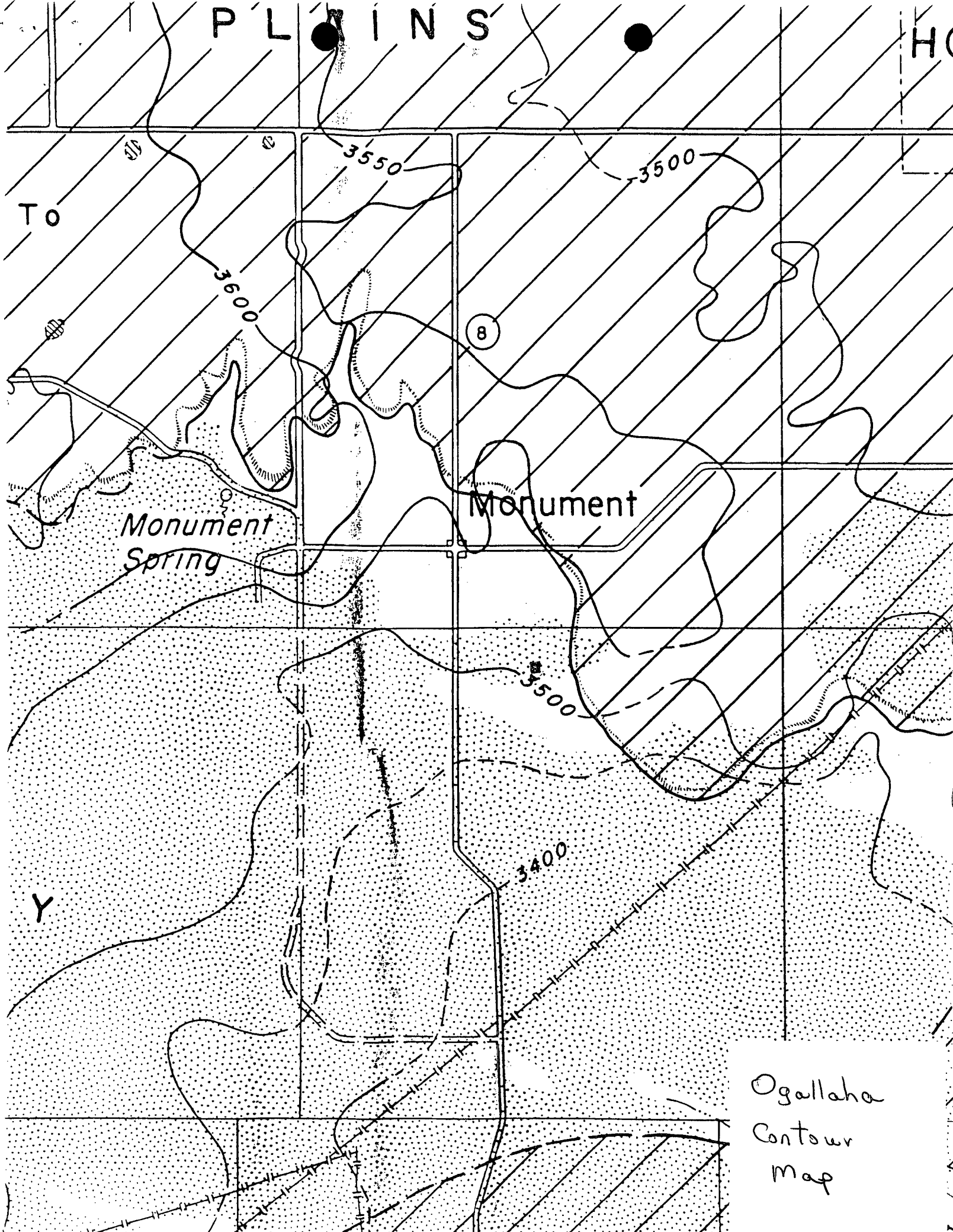
8

Monument
Spring

Monument

Y

Ogallala
Contour
map



OIL CONSERVATION DIVISION
RECEIVED

EDDIE SEAY CONSULTING

601 W. ILLINOIS
HOBBS, NEW MEXICO 88240

CERTIFIED

Z 106 619 747

MAIL

5 MAR 3 AM



U.S. POSTAGE
PAID
HOBBS, NM
88240
NOV 14, 1994
AMOUNT

\$2.29
00024100-04

1st Notice **DEC-3-1994**
2nd Notice
Return

MOVED, LEFT NO ADDRESS
FORWARDING ORDER EXPIRED
UNCLAIMED
REFUSED
NO SUCH STREET
NO SUCH NUMBER



W/12/13/13ch

Joe R. Williams
Box 215
Monument, NM 88265

Name
1st Notice
2nd Notice
Return

NAME *JR*
1st Notice *11-15-94*
2nd Notice
Return *11-30-94*

SENDER: <ul style="list-style-type: none">• Complete items 1 and/or 2 for additional services.• Complete items 3, and 4a & b.• Print your name and address on the reverse of this form so that we can return this card to you.• Attach this form to the front of the mailpiece, or on the back if space does not permit.• Write "Return Receipt Requested" on the mailpiece below the article number.• The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): <ul style="list-style-type: none">1. <input type="checkbox"/> Addressee's Address2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: SW Cattle Co. P.O. Box 549 Hobbs, NM 88241		4a. Article Number Z 106 619 743	
		4b. Service Type <ul style="list-style-type: none"><input type="checkbox"/> Registered <input type="checkbox"/> Insured<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD<input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
5. Signature (Addressee) <i>11-15-94</i>		7. Date of Delivery	
6. Signature (Agent) <i>[Signature]</i>		8. Addressee's Address (Only if requested and fee is paid)	

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Coy R. Doyal
Box 188
Monument, NM 88265

4a. Article Number
Z 106 619 744

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11-15-94

5. Signature (Addressee)
Coy R. Doyal

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Ranja Weir
711 Greenview Cir.
Sand Springs, OK 74063

4a. Article Number
Z 106 619 745

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11-23-94

5. Signature (Addressee)
Ranja Weir

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

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- Write "Return Receipt Requested" on the mailpiece below the article number.
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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Carlyle J. Hall
Box 163
Monument, NM 88265

4a. Article Number
Z 106 619 746

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11-16-94

5. Signature (Addressee)
Carlyle J. Hall

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 ★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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SENDER:

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- Complete items 3, and 4a & b.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Jimmy E. Cooper
Box 55
Monument, W. 88265

4a. Article Number

4 106 619 748

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

11-16-94

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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SENDER:

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

314
P.O. Box 1778
Carlsbad, N. 88221-1778

4a. Article Number

3106 619 74

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

11/15/94

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

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I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

4a. Article Number

4 106 619 750

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

11/15/94

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form 3811, December 1991

☆U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

C + C Expansion

November 12, 1994

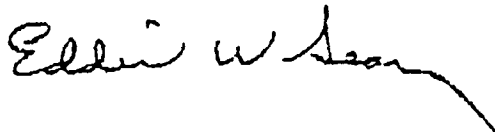
Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that C & C Landfarm, Inc., a State approved disposal facility located in Sect. 3, Township 20, Range 37 E., SW 1/4 of the NE 1/4 Unit G, Lea Co., New Mexico, is filing for expansion to the existing permit. The expansion is a 40 acre tract adjacent to the existing facility on the north side, all on deeded land. The location of the expansion is Unit B the NW 1/4 of the NE 1/4 of Sect. 3, Township 20, Range 37 E., Lea Co., New Mexico. The facility will be for the disposal of oil and gas contaminated soils only.

Any questions concerning the permit or its expansion can be directed to Eddie W. Seay, agent for C & C, (505)392-2236 or Chris Eustice, State of New Mexico Oil Commission, (505)827-5884.

Any complaints or objections must be filed within 30 days of this notice to Chris Eustice, Oil Conservation Commission, State of New Mexico, Box 2088, Santa Fe, NM 87501.

Thank you.



Eddie W. Seay, CEI, CES
601 W. Illinois
Hobbs, NM 88240
(505)392-2236



STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

'94 SEP 29 AM 8 52 OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

September 27, 1994

**Jimmie T. Cooper
C & C Landfarm Inc.
P.O. Box 55
Monument, New Mexico 88265**

Reference: Inquiry from Transwestern Pipeline Co. to dispose of RCRA non-exempt contaminated soils into C & C Landfarm.

Subject: Procedure for accepting RCRA non-exempt oil and gas (oilfield) contaminated soils into the C & C landfarm.

Dear Jimmie,

The NMOC District I office recently received an inquiry about disposing of some contaminated soils generated at the Transwestern Pipeline Co. Eunice Compressor Station. Transwestern's consultant company, Daniel B. Stephens & Associates of Albuquerque is handling this project. Their contact is Mr. Bob Marley and can be reached at 505-822-9400.

After discussing this situation with Mr. Marley it appears that this waste was generated from a clean-up effort from around their compressor building. This soil is contaminated in part with used compressor lube oil. Therefore, this material is classified as an non-exempt waste. All non-exempt waste that is accepted into your landfill must adhere to the following procedure and use the provided forms enclosed.

Please find enclosed the form "REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE". Please note it is the responsibility of the Landfarm operator to sign off on this form. The operator is also responsible to collect all the necessary information from the generator and attach it to this form.

Permit conditions require the operator of the landfarm to retain all records on site.



Once the NMOCD receives the form with attachments, then it is reviewed by the district office for any deficiencies. It then is sent to Santa Fe for their approval. After it is approved then the Landfarm operator will be notified by this office and then C & C can notify the generator. C & C and the generator can then proceed with the disposal of the waste.

The generator must supply the proper information to the Landfarm operator as noted on item 9c. of the form. Included should be analytical results of the waste or "Knowledge of Process" of the waste stream demonstrating that the waste is not hazardous under EPA-RCRA laws.

I have also enclosed a copy of a generic form of a **"Certificate of Waste Status for Non-Exempt Material"** to be signed off on by the generator and supplied to the Landfarm operator. Please note, some companies choose to have their legal staff rewrite this statement. They may do so as long as it meets the minimum requirements certifying that the waste does not contain "RCRA Listed" waste or has been mixed with such waste.

If you have any further questions or require assistance in this procedure please do not hesitate to call or write. Also, please feel free to copy these forms for future use.

Sincerely yours,



Wayne Price-Environmental Engineer

cc: Jerry Sexton-District I Supervisor-Hobbs, NM
Roger Anderson-Environmental Bureau Chief-Santa Fe, NM
Bill Olson-Hydrogeologist-Santa Fe, NM
Bill Marley-Daniel B. Stephens & Associates-Albq. NM
Larry Campbell-Transwestern Pipeline-Roswell, NM

attachments-2

DISTRICT I

PO Box 1980

Edgewood, NM 88241-1980

DISTRICT II

PO Drawer 143

Artesia, NM 88211-0143

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

DISTRICT III

1000 Rio Arriba
Aztec, NM 87410

DISTRICT IV

PO Box 388
Santa Fe, NM 87501

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE		XXXXXXXXXXXXXXXXXXXXXXX
1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator	
2. Destination	5. Name of Originating Site	
3. Address of Facility Operator	6. Name of Transporter	
7. Location of Material (Street Address or ULSTR)	8. State	
9. <u>Circle One</u> A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-oilfield exempt wastes will be accompanied by a certification of waste status from the Generator and the New Mexico Environment Department or other appropriate government agency; two certificates per job. C. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analyses to prove the material is non-hazardous and the Generator's certification of origin. No waste classified as hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.		

BRIEF DESCRIPTION OF THE MATERIAL:

Estimated Volume - _____ cy Known Volume (to be entered by the operator at the end of the haul): _____

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE _____ TITLE _____ DATE _____

TYPE OR PRINT NAME _____ TELEPHONE NO. _____

(This space for State Use)

APPROVED BY _____ TITLE _____ DATE _____

APPROVED BY _____ TITLE _____ DATE _____

CONTINUOUS OF APPROVAL, IF ANY:

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: _____

Source: _____

Disposal Location: _____

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned as the agent for the _____
concur with the status of the waste from the subject site.

Name _____

Title/Agency _____

Address _____

Signature _____

Date _____

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 20, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL

RETURN RECEIPT NO.P-176-012-262

Mr. Jimmie Cooper
C&C Land Farm
Box 55
Monument, New Mexico 88265

**RE: Oil Conservation Division
Request to Expand C&C Landfarm**

Dear Mr. Cooper,

The Oil Conservation Division (OCD) has received your request and is in the process of reviewing the above referenced application to expand your existing facility located in the SW/4 NE/4 of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The following comments and requests for additional information are based upon review of the application, dated June 15, 1994, for authorization to expand your existing facility to include an additional 40 acres.

1. Provide a plat and a topographic map indicating the location of the proposed forty (40) acres in relation to governmental surveys (1/4 1/4 section, township and range), highways or roads giving access to the facility site, and watercourses, water wells, and dwellings within one mile of the site.
2. List the name and addresses of all landowners within one-half (1/2) mile of the proposed expansion.
3. Provide a description of the facility with a diagram indicating the location of the following:
 - a. Roads, fences, gates, berms, ditches, and proposed cells.
 - b. All Pipelines crossing the facility, including owner, contents, depth and size of the pipeline(s).
 - c. Actual or proposed offices and/or storage buildings.

- d. Chemical storage areas indicating the type of storage containers (ie. drums, sacks, tanks, etc.)
 - e. Any on-site storage/disposal facilities for wastes other than contaminated soils to be landfarmed (ie. waste oil, wash bay sumps, etc.)
- 4. Attach proof that the notice requirements of Rule 711 have been met.
 - 5. Geologic/hydrologic evidence demonstrating that disposal of oilfield wastes will not adversely impact fresh water.
 - 6. Certification by an authorized representative of the applicant that information submitted in the application is true, accurate and complete to the best of the applicants knowledge. (Use the attached application for submission of this information.)

Submission of the above requested information will allow the review of the above referenced application to continue.

If you have any questions please call me at (505) 827-5824.

Sincerely,



Chris Eustice
Environmental Geologist

xc: OCD-Hobbs Office, Jerry Sexton
OCD-Hobbs Office, Wayne Price



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

September 13, 1994

CERTIFIED MAIL
RETURN RECEIPT NO.P-176-012-260

Mr. Jimmie Cooper
C&C Land Farm
Box 55
Monument, New Mexico 87504

**RE: Oil Conservation Division
Case No. 11086
Request to Expand C&C Landfarm**

Dear Mr. Cooper,

The Oil Conservation Division (OCD) has received your request, dated July 15, 1994, for authorization to expand your existing facility to include an additional 40 acres. Pursuant to this request and opposition expressed by Mr. Tom Kellahin on behalf of his clients, the OCD set for hearing on September 15, 1994 this request before the Division Hearing Examiner. The OCD now recognizes that this case was set for hearing before the administrative review of the expansion request had been completed. This hearing has been cancelled.

The administrative procedure for review of your request dated July 15, 1994 will be for the OCD to complete the evaluation of all technical information, provided initially or supplementally at the request of the OCD. The OCD will then administratively approve or deny the request. If administrative approval is granted, conditions of approval will be drafted and provided to all interested parties for review. If any person expresses technical opposition to these conditions of approval they may request a hearing on these conditions and/or recommend additional conditions of approval.

The OCD will give all protesters the opportunity to evaluate the application and respond with substantive technical information. Active participation by informed neighboring landowners can be very useful to the OCD to insure that the facility is permitted with appropriate operational requirements.

If you have any questions please call me at (505) 827-5824.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Eustice". The signature is fluid and stylized, with the first name "Chris" and last name "Eustice" clearly distinguishable.

Chris Eustice
Environmental Geologist

xc: OCD-Hobbs Office, Jerry Sexton
 OCD-Hobbs Office, Wayne Price
 W. Thomas Kellahin, Esq.
 William F. Carr, Esq.



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

September 8, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-239

Mr. Jimmie Cooper
C&C Land Farm
Box 55
Monument, New Mexico 88265

**RE: Request to Add Additional Berm Material to Land Farm
Lea County, New Mexico**

Dear Mr. Cooper,

The Oil Conservation Division (OCD) has received your request, dated July 8, 1994, for authorization to use 352 yards of petroleum contaminated soil and rock received from Enron Corporation to modify and expand the existing berm at the land farm. Your request is hereby denied due to the high level of petroleum contamination in the material.

Soils remediated at the land farm are required to have a total petroleum hydrocarbon content (TPH) of 100 parts per million (ppm) TPH prior to removal from the landfarm. Soils brought to the land farm are to be remediated. The soils proposed are of a TPH concentration in excess of 100 ppm.

If you have any questions in regard to this denial call me at (505) 827-5824.

Sincerely,

Chris Eustice
Geologist

cc: OCD-Hobbs Office, Jerry Sexton
OCD-Hobbs Office, Wayne Price

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Notice Of Publication

and ~~XXXXXXXXXX~~ in the
 Court of Lea
~~XXXXXXXXXXXXXXXXXXXX~~, was published in a regular and
 entire issue of THE LOVINGTON DAILY LEADER and
 not in any supplement thereof, once ~~XXXXXXXXXXXXXXXXXXXX~~
 for one (1) day
~~XXXXXXXXXXXXXXXXXXXX~~

consecutive weeks, beginning with the issue of

July 12, 1994

and ending with the issue of

July 12, 1994

And that the cost of publishing said notice is the
sum of \$ 40.68

which sum has been (Paid) (~~Assessed~~) as Court Costs

Subscribed and sworn to before me this 12th

day of July 1994

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1994

LEGAL NOTICE
NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following permit modification has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505)827-5800:

C&C Landfarm Inc., Eddy W. Seay, Agent, Box 55, Monument, New Mexico, 88265, has submitted an application to modify their previously approved commercial landfarm located in the NE/4 of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 6 inch lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the north 40 acres. Groundwater most likely to be affected by any accidental discharges at the surface is not known to be present in the area of 1/2 mile from the boundary of the facility. The facility is underlain by redbeds ranging in thickness from 430 feet to 1200 feet. The permit application addresses the

construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The permit modification application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed permit modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any affected person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit modification based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit modification based on information in the application and information submitted at the hearing.

GIVEN under the Seal of New
Mexico Oil Conservation
Commission at Santa Fe,
New Mexico, on this 6th day
of July, 1994.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director

SEAL
Published in the Lovington
Daily Leader July 12, 1994.

gave Mary same copy
w/ an invoice (initialed)

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN*

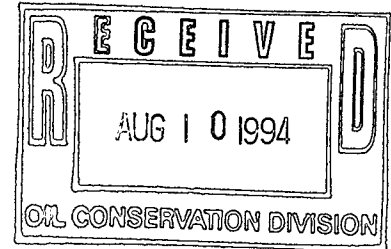
*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

August 11, 1994

HAND DELIVERED



Mr. William J. LeMay
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, 2nd Floor
Santa Fe, New Mexico 87501

Re: REQUEST FOR HEARING AND STATEMENT OF OBJECTIONS

*In the matter of the application of C & C Landfarm, Inc.
for expansion of a commercial surface waste disposal facility,
Lea County, New Mexico.*

Dear Mr. LeMay:

On behalf of W. T. (Trent) Stradley and S-W Cattle Co., please find enclosed our referenced Request for Hearing and Statement of Objections which we request be set for hearing before a Division Examiner.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W. Thomas Kellahin".

W. Thomas Kellahin

w/ Enclosure:

cc: C. Gene Samberson, Esq.

cc: Eddie Seay, agent for C & C Landfarm, Inc.

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE REQUEST
OF C & C LANDFARM, INC. FOR
EXPANSION OF A COMMERCIAL SURFACE
WASTE DISPOSAL FACILITY,
LEA COUNTY, NEW MEXICO**

**REQUEST FOR HEARING
AND
STATEMENT OF OBJECTIONS
BY
S-W CATTLE CO. AND W. TRENT STRADLEY**

Comes now W. T. (Trent) Stradley and S-W Cattle Co. ("the Opponents") by and through their attorneys, C. Gene Samberson, Esq. and W. Thomas Kellahin, Esq. and object to the New Mexico Oil Conservation Division granting the request of the applicant, C & C Landfarm, Inc. ("C&C"), to expand/modify its existing facility in the NE/4 of Section 3, T20S, R37E, Lea County, New Mexico, and in support states:

INTRODUCTION

Gene Samberson, attorney for W. T. Stradley, happened to read a copy of the Lovington Daily Leader on Tuesday, July 12, 1994 in which notice by publication was being attempted by the New Mexico Oil Conservation Division for the modification by C & C Landfarm, Inc. of its commercial landfarm facility located in the NE/4 of Section 3, T20S, R37E, NMPM, Lea County, New Mexico;

**Request for Hearing and
Statement of Objections
Page 2**

On August 8, 1994, a search of the New Mexico Oil Conservation Division ("NMOCD") files on the C&C's application were made and copies of all relevant documents were provided by Roger Anderson, Environmental Bureau Chief, New Mexico Oil Conservation Division ("NMOCD-EB"), concerning this application. C&C's submittal to the NMOCD consists of a single page letter attached as Exhibit "A" hereto.

(1) INADEQUATE NOTICE

Since April, 1992, the Opponents have complained about receiving inadequate notice from both the NMOCD and this applicant about this facility, including the NMOCD-EB approving this facility and the various amendments to that Application. The notice in this case is flawed and continues to violate due process.

Order R-9769-A perpetuated that violation of procedural due process by approving (contrary to NMOCD Rule 1207(11) and Rule 711) an order which allows amendments to this facility to take place without public notice or hearing. The OCD Conditions appended to Order R-9769-A, specifically, OCD Conditions #1 and #10 set up a process for the Applicant to expand its waste facility to accept other contaminants and to do so without public notice or public hearing.

The Opponents and their participation in this matter before the NMOCD is well known to both C&C and the NMOCD. Yet, rather than send actual written notice to the Opponents, both C&C and the NMOCD are attempting to rely exclusively upon notice to the Opponent by newspaper publication. Fortunately for the Opponents, Mr. Samberson happened to read the notice.

In no other proceeding before it does the NMOCD attempt to rely exclusively upon newspaper publication as adequate notice. Yet in this case, C&C is attempting to modify and expand its facility again without actual notice to the Opponents and without a public hearing.

**Request for Hearing and
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(2) FAILURE TO COMPLY WITH DIVISION RULE 711

NMOCD Rule 711 requires that prior to the enlargement or a modification of a commercial surface waste disposal facility, a detailed application for such a modification/enlargement to an existing permit shall be filed with the NMOCD-Santa Fe to be accompanied with attachments addressing some eleven different enumerated items.

A search on August 8, 19094 of the NMOCD files on this matter revealed that the applicant filed a one page letter dated Jun 15, 1994 and nothing else. Applicant failed to comply with the Division Rule 711 and its request must be dismissed.

(3) RULE 711 NOTIFICATION

Rule 711 further requires written notification to the owners of the surface lands and occupants within one-half (1/2) mile. S-W Cattle Co. and W. T. Stradley are such owners/occupants and were not and have not been notified as required by Division Rule 711.

The applicant failed to comply with the notice requirements of Rule 711 and its request must be denied.

**(4) OCD-ENVIRONMENTAL REGULATIONS
VIOLATE DUE PROCESS**

The Division is utilizing a complex set of rules and regulations (some of which are contrary to and inconsistent with existing Division rules and regulations) with which to process C&C's application and by which to establish operational regulations for this facility and to monitor compliance.

None of these environmental rules and regulations ever has been properly adopted by the Division. (See NMOCD Rule 1201).

**Request for Hearing and
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The NMOCD, by avoiding its public hearing process (See NMOCD Rule 1201 and its general notification procedures (See NMOCD Rule 1207) has allowed its Environmental Bureau to unilaterally promulgate rules and regulations and issue amendments which are disguised as "guidelines" and in doing so has precluded both the oil and gas industry and the public from having meaningful comment, objection and input.

However well intended, such procedures are a violation of procedural due process and have resulted in invalid rules and regulations which the NMOCD is currently applying in this case.

(5) ENVIRONMENTAL BUREAU ACTIONS

The subject facility is being designed by the OCD and not the Applicant and is being permitted without any science or experience to know that it will work. This has been and continues to be a "make it up as you go" process by which the agency designs the specifications for the facility and then challenges the Opponents to prove them wrong. Such an adversarial role is not the proper role for this agency.

The Environmental Bureau-OCD based upon a phone call and a one page letter from the applicant apparently has undertaken C&C's burden to provide the necessary data to support such an application. Rather than functioning as a reviewing regulatory agency, the NMOCD-EB in this case has taken a facilitator's role by providing technical support and assistance to the applicant.

The methods used by the Division in processing this case violates procedural due process.

In its efforts to accommodate the requests of a former NMOCD employee, Eddie Seay, consultant for C&C, the Environmental Bureau's actions in this case have impaired and tainted its ability to be perceived as impartial.

**Request for Hearing and
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This matter should be set for hearing before a Division Examiner in order to afford the Opponents their right to have such matters determined by an impartial hearing examiner.

(6) APPEAL OF ORIGINAL APPROVAL

Commission Order R-9769-A is fatally flawed and is still pending an appeal hearing in State District Court in the Fifth Judicial District for Lea County, New Mexico. Any action on this application to modify/expand this facility must be stayed pending a decision by the District Court in Case CIV 93-247.

(7) TWO AQUIFERS TO BE PROTECTED

One of the aquifers at risk is the Stradley Aquifer in the shallow alluvium down slope from the proposed waste facility. The issue is where are the vertical and horizontal limits of that aquifer and its recharge system.

Mr. Stradley, who has been over every part of this "White Break" area for decades, will testify that the original facility and its proposed expansion are located on the northeast edge of a natural topographical depression with his fresh water windmill located in the bottom of that depression and in excess of 30 feet lower than the surface waste facility.

A visual inspection of the surface of the facility allows the observer to infer that the surface topography would increase the risk of contamination to the Stradley Aquifer. The Division's records on this case already contain evidence of an extensive search of the State Engineer's records concerning fresh water wells in the area which show the presence of some forty-six (46) water wells in the area.

Mr. Tim Kelly, an expert hydrologist, will also testify and conclude that the likely direction of contaminant movement from the waste facility will be down gradient along the redbed surface; that there have been no

**Request for Hearing and
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hydrologic studies of the area to determine gradients and therefore no way to know the length of time and distance of travel of the contaminants, tat there has been no scientific study of the redbeds and the movement cannot be predicted. His point will be that the Division originally should not have approved this facility and cannot approve this expansion/modification until that determination is made.

In addition, the Ogallala aquifer also is present under the waste facility. If the Division wants to decide this case based upon the presence or absence of the Ogallala aquifer under the facility, then the fact is the Ogallala aquifer IS PRESENT UNDER this surface waste facility.

**(8) APPLICANT HAS NOT PRESENTED SUBSTANTIAL
SCIENTIFIC STUDY ABOUT THE STRADLEY AQUIFER**

C&C now seeks to expand and modify a facility which was improperly approved by the Division in the first place. It is C&C's burden of proof to demonstrate to the Division that the expansion of this facility will not harm the fresh water aquifer.

C&C has yet to provide evidence of the size, shape and hydrology of the Stradley Aquifer from which the Stradley windmill produces fresh water which continues to be a failure of the Applicant to meet its "Burden of Proof."

The ultimate factual issue for this expansion and its original facility is whether this surface waste facility creates a risk of contamination to the fresh water aquifer from which Trent Stradley's well has produced continuously in excess of forty-five (45) years and is the only fresh water supply for cattle in some nine sections and is referred to herein as the "Stradley Aquifer."

To answer that issue, it is essential for the Division to have proper scientific evidence about the Stradley Aquifer including its size, shape and

**Request for Hearing and
Statement of Objections
Page 7**

recharge mechanics. C&C has never submitted such scientific evidence and that failure of evidence is fatal to its case.

The fact that the Applicant did not find the Stradley Aquifer with some five shallow monitor wells drilled on the proposed facility does not substitute for a proper hydrologic study to determine the risk to the Stradley Aquifer. Contaminates can be introduced on the surface and with the introduction of rain will percolate into the ground both vertically and horizontally and migrate into the Stradley Aquifer.

Nobody knows how the Stradley Aquifer is recharged and from what source. Nobody knows the size and shape of the Stradley Aquifer. The Division up until now has ignored that absence of evidence and in doing so, failed to decide the ultimate issue in this case.

It is the Applicant's Burden of Proof and not the NMOCD or the Opponents' burden, to produce the hydrologic study of the Stradley Aquifer which must provide convincing evidence that no risk was being imposed upon the Stradley Aquifer by this waste facility.

**(9) APPLICANT HAS NOT PRESENTED ANY
PROPER SCIENTIFIC STUDY ABOUT THE
EXPANSION OF THIS FACILITY**

C&C has submitted no scientific data on soils tests and therefore no compaction data, no composition data, and permeability data from which to determine the construction and maintenance standards for the berm. Further C&C does not detail the constructions, maintenance or operations requirements for the berm.

In addition, the Applicant has failed to provide evidence as to any of the following:

- (1) composition samples and tests
- (2) soil samples and tests
- (3) compaction tests

- (4) permeability tests
- (5) Cation Exchange capacity tests
- (6) liquid and plastic tests of the redbeds
- (7) any soil properties tests and data
- (8) any hydrology studies
- (9) any groundwater studies
- (10) any percolation tests or data
- (11) any ground water migration tests/data
- (12) any contaminant mobility tests/data

(10) NEED FOR ADEQUATE HORIZONTAL BUFFER ZONE:

A Buffer Zone is essential but the proper distance must be based upon some site specific scientific reasons to determine that distance is adequate. There is no scientific basis for the distance being 100 foot horizontal setback ("buffer") as recommended by Kathy Brown of the OCD-EB. The adoption of an arbitrary distance for the Buffer Zone without any scientific basis is objected to by the Opponents.

(11) TREATMENT ZONE MONITORING

In Order R-9769-A, a mistake was made when it adopted the OCD-EB proposed conditions concerning the Treatment Zone and its Monitoring. The OCD-EB speculated that the first three feet of native soils will be an adequate "Treatment Zone" and with monitoring will protect ground water.

Again, Kathy Brown, previously testified in support of the adoptions of the OCD-EB conditions was not a qualified expert hydrologist and did not undertake an adequate scientific study to justify its Treatment Zone Monitoring.

The proposed monitoring of the Treatment Zone has no scientific basis for determining its reliability. There is no data from which to determine that the location of the cells in which the contaminated soils will

**Request for Hearing and
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be placed have been located an adequate distance from either the excavated pits or from the boundary of the adjoining Stradley property. Nobody knows how frequently to sample and how many samples per acre to take in order to detect contamination in the Treatment Zone.

The OCD-EB Revised Recommendations are inadequate to detect any leaching process of movement of contaminants that could cause the pollution of nearby fresh water supplies.

In summary, should the Division use the former OCD-EB recommendations for this facility, they will be inadequate to provide reasonable protection of the valuable groundwater present in the immediate adjacent tracts.

Any approval of this expansion should correct the inadequacies made in the Order R-9769-A.

OPPONENTS OFFER OF PROOF

The Opponents WILL PRESENT evidence that the granting of this application by the Division will failed to protect human health and the environment and will constitute a risk of contamination of ground water, including the following:

- (a) The Applicant's proposed plan will place at risk shallow water wells located down-dip from the proposed landfarm which will be subject to contamination from seepage of leachate contaminants.
- (b) The Applicant's plans to prevent migration of contaminants down gradient along the redbed surface is inadequate.
- (c) The proposed monitor wells are improperly located and will not afford adequate assurance of detection of contaminants.

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(d) The proposed dike identified in OCD Condition (10) in said Order is insufficient and conditions on compaction and verification are inadequate to stop the mobility of the leachate contaminants.

(e) The composition of the berm is not environmentally safe.

(f) Additional soil tests should be performed on the redbed soil including:

- (1) Falling head permeability tests,
- (2) Soil property tests,
- (3) Cation Exchange Capacity tests,

(g) Applicant needs to perform liquid and plastic tests on the redbeds.

(h) The Applicant's proposed barrier is inadequate for its proposed landfarm.

(i) Applicant's geology is inadequate and fails to include an east-west cross section.

The OCD-Environmental Bureau has previously assumed that the contaminated soils will be kept from any shallow fresh water because of about three (3) feet of native soil is to be used as a "treatment zone."

There is no characterization of the "redbeds." In this area there are the Triassic deposits, probably the Chinle shale, and referred to as the "redbeds." The integrity of this landfarm system is dependent upon the impermeability of the redbeds, but the Applicant has presented no data about the physical characteristics of these deposits, such as cation exchange rates, in-situ permeability, remolded permeability at specified compaction ratios, swelling characteristics, etc. All of these are critical factors that ensure that there would be no migration of leachate along the top of or through the redbeds.

**Request for Hearing and
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There are inadequate horizontal and vertical buffer zones surrounding this proposed facility. The configuration of the upper surface of the redbeds in the 40-acre tract has not been defined.

RECOMMENDATIONS

Opponents recommend to the Division that the request to expand/modify this facility be DENIED.

Respectfully submitted,

KELLAHIN AND KELLAHIN,

A handwritten signature in dark ink, appearing to read 'W. Thomas Kellahin', written over a horizontal line.

W. Thomas Kellahin, Esq.
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

C. Gene Samberson, Esq.
P. O. Drawer 1599
Lovington, New Mexico 88260
(505) 396-5303

ATTORNEYS FOR OPPOSITION-
W.T. STRADLEY
S-W CATTLE CO.

EDDIE SEAY
CONSULTING

601 W. ILLINOIS

HOBBS, NEW MEXICO 88240

(505) 392-2236

FAX (505) 392-6949

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



June 15, 1994

Ms. Kathy Brown
NMOCC
Box 2088
Santa Fe, NM 87504-2088

SUBJECT: C & C Landfarm, Inc.

Dear Kathy:

As we discussed a few weeks earlier, C & C would like to expand its boundaries to add an additional 40 acre tract to our facility.

This additional 40 acres is conjoined with the existing facility and only separated by our berms and buffer zone. The property is in Unit Letter B NW 1/4 NE 1/4. The property is deeded land owned by Jim Cooper and family, and all the offset landowners will be the same as on original application.

C & C will operate this property under the same conditions as stated in our original permit.

If additional information is needed or if you have questions, please call.

Sincerely,

Eddie W. Seay, Agent

EXHIBIT "A"



**UNITED STATES
DEPARTMENT OF THE INTERIOR**

FISH AND WILDLIFE SERVICE
Ecological Services

Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

July 18, 1994

OIL CONSERVATION DIVISION
RECEIVED

'94 JU 21 AM 8 50

William J. Lemay, Director
New Mexico Water Quality Control Commission
Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to your agency's public notice dated July 6, 1994, regarding the State of New Mexico's proposal to renew the discharge plan for the applicant listed below.

C & C Landfarm Inc., Eddy W. Seay, Agent, Box 55, Monument, New Mexico, 88265 The applicant has submitted an application to modify their previously approved commercial landfarm located in the NE¼ of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The facility remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 6-inch lifts or less, and periodically disking them to enhance biodegradation of contaminants. The requested permit modification would allow the facility to expand its operation on an adjacent 40-acre tract of land located north of the present site.

We believe that it is unlikely that increasing the size of the existing landfarm will adversely impact any federally-listed threatened or endangered species. However, landfarm activities also should not be permitted to adversely affect migratory birds. Even if the Oil Conservation Division (OCD) cannot formally require the permittee to contact either the U.S. Fish and Wildlife Service (Service) or the New Mexico Department of Game and Fish in the event of significant fish or wildlife die-offs, a copy of this letter or other informal notification could be made available to the operators. We would be happy to work with your agency in this regard.

Our intent in requesting OCD to inform permittees about the necessity of preventing adverse impacts to wildlife is hopefully to be able to intercede before any problems that may occur become serious, thus requiring law enforcement intervention. Early detection of wildlife die-offs, coupled with prompt notification of wildlife officials can often avert serious wildlife mortality. Failure to enlist the assistance of the Service in the prevention and resolution of migratory bird die-offs could result in permittees for landfarms (or other facilities) being held liable under the enforcement provisions of the Migratory Bird Treaty Act (MBTA). The MBTA makes it unlawful for anyone at anytime or in any manner to take (i.e., pursue, hunt, take, capture, kill, transport, or possess) any migratory birds unless authorized by a permit issued by the Department of the

William J. Lemay, Director

2

Interior. Illegal take has been interpreted by the courts to include, among other things, accidental poisoning or accumulation of harmful levels of contaminants by migratory birds, even if the contamination event was accidental or the perpetrator was unaware of the fact that his/her actions (or failure to take action) could ultimately prove harmful to migratory birds. The strict liability enforcement provisions of the MBTA precludes the necessity of proving intent and permits criminal prosecution of persons, associations, partnerships, or corporations which inadvertently or intentionally kill or illegally take one or more migratory birds.

Thank you for the opportunity to review and comment on this discharge plan application. If you have any questions concerning these comments, please contact Mark Wilson at (505) 883-7877.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Fowler-Propst", with a large, stylized flourish extending from the end of the signature.

Jennifer Fowler-Propst
State Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico

OIL CONSERVATION DIVISION
RECEIVED

94 JUL 19 AM 8 50

C&C Land Farm

Box 55

Monument, N.M. 88265

July 8, 1994

Mr. Roger Anderson
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, N.M. 87504

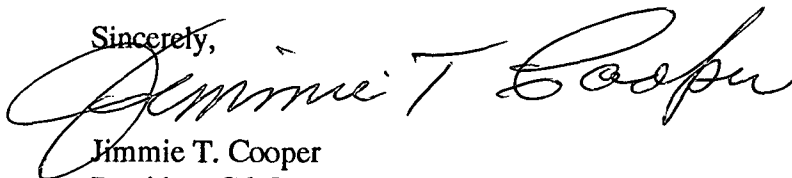
Re: Permission to add additional berm material to land farm.

Dear Roger,

C & C Land Farm received 352 yards of contaminated rock and soil from Enron in Hobbs, N.M. analytical provided by Enron is also attached. Eighty percent of this is caliche rock, and at this time we would like OCD's approval to use a blade to roll the rock to the inside of the existing berm. In doing this we will increase the width and the integrity of the north berm while at the same time keeping the contaminated rocks and soil in the land farm where remediation can begin.

Thank you for your consideration in this matter.

Sincerely,



Jimmie T. Cooper
President C&C

cc: Wayne Price
Jerry Sexton
Eddie Seay
Mike Kneese Enron

FAY &

Comments: P. 1

FAX TO WORK : (505) 397-1768

ATTN: ACCESSION #
401339 (-01/-62/-03/-04)

read results to home: (505) 392-1591

Please contact your Project Manager regarding any questions or comments about this fax.

Age of _____ of _____

ATI Accesión #: 406839

Reviewed by: *AMR*

Client Sample ID	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Total Xylenes (mg/kg)	MTBE (mg/kg)	Fuel HC (mg/kg)	HC Range	Quantitated Using
240206 H446148	<0.025	<0.025	<0.025	<0.025	<0.12	1700	C12-C36+	DIESEL
240206 H446158	<0.025	<0.025	<0.025	0.14	<0.12	1500	C16-C36+	✓
240206 H446208	<0.025	<0.025	0.44	0.89	<0.12	6100	C9-C36+	✓
240206 H446258	<0.025	<0.025	0.089	0.22	<0.12	2300	C9-C36+	DIESEL

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/10/94	1
02	940906 HOBBS 1 SP	NON-AQ	06/09/94	06/10/94	06/10/94	1
03	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/10/94	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE	MG/KG	<0.025	<0.025	0.44
TOTAL XYLENES	MG/KG	<0.025	0.14	0.89
METHYL-t-BUTYL ETHER	MG/KG	<0.12	<0.12	<0.12

SURROGATE:

BROMOFLUOROBENZENE (%)	101	111	100
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GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	940906 HOBBS 2 SP	NON-AQ	06/09/94	06/10/94	06/10/94	1

PARAMETER	UNITS	04
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	0.099
TOTAL XYLENES	MG/KG	0.22
METHYL-t-BUTYL ETHER	MG/KG	<0.12

SURROGATE:

BROMOFLUOROBENZENE (%)

102

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/11/94	5
02	940906 HOBBS 1 SP	NON-AQ	06/09/94	06/10/94	06/11/94	5
03	940906 HOBBS 2 NP	NON-AQ	06/09/94	06/10/94	06/13/94	20
PARAMETER			UNITS	01	02	03
FUEL HYDROCARBONS			MG/KG	1700	1500	6100
HYDROCARBON RANGE				C12-C36	C16-C36	C9-C36
HYDROCARBONS QUANTITATED USING				DIESEL	DIESEL	DIESEL

SURROGATE:

O-TERPHENYL (%)

126

116

NA*

*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	940906 HOBBS 2 SP	NON-AQ	06/09/94	06/10/94	06/11/94	5

PARAMETER	UNITS	04
FUEL HYDROCARBONS	MG/KG	2300
HYDROCARBON RANGE		C9-C36
HYDROCARBONS QUANTITATED USING		DIESEL

SURROGATE:

O-TERPHENYL (%) 83

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following permit modification has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

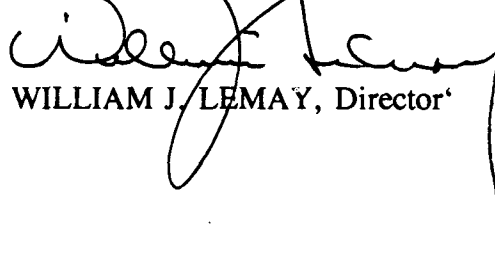
C & C Landfarm Inc., Eddy W. Seay, Agent, Box 55, Monument, New Mexico, 88265, has submitted an application to modify their previously approved commercial landfarm located in the NE/4 of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 6 inch lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the north 40 acres. Groundwater most likely to be affected by any accidental discharges at the surface is not known to be present in the area of 1/2 mile from the boundary of the facility. The facility is underlain by redbeds ranging in thickness from 430 feet to 1200 feet. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The permit modification application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed permit modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any affected person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit modification based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit modification based on information in the application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of July, 1994.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

RECORD OF PHONE CONVERSATION (W/CHRIS EUSTICE)

Date: 7-1-94 Time: 1000 AM
RE: C&C Landfarm request to build berms
Name: Eddy Scary
Company: C&C Landfarm

C&C put in a request to build berms
w/ TPH contaminated soils.
Enviro. Bureau denied this request.

C&C spread the soils on the landfarm
to be remediated.

Comments/Followup:

C&C did not build berms.
They "pulled" the request

C. Eustice



BRUCE KING
GOVERNOR

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

RECEIVED

JUN 16 1994 8 50

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

NMOCD Inter-Correspondence

To: Roger Anderson-Environmental Bureau Chief

From: Wayne Price-Environmental Engineer District I *Wayne Price*

Date: June 16, 1994

Reference: C & C Landfarm
2 miles SE of Monument NM
SW/4 NE/4 sec 3-Ts 20s-R37 e

Subject: Requesting permission to construct berms out of caliche that is contaminated with low levels of hydrocarbons.

Comments: Please find enclosed letter dated June 15, 1994 from Peak consulting services who represents C&C Landfarm Inc. They are requesting that certain caliche that was removed from a nearby gas plant be used as berm material inside of the existing landfarm. I inspected the site on June 14, 1994 and the material in question is primarily caliche from fine powered to rocks of 6 to 8 inches in size. Presently the material is being aerated and other material is going to be removed from it such as plastic, paper, etc.

The material has very little visual contamination and slight olfactory hydrocarbon smell. Analytical work has been performed on it by Enron and is attached for your review.

I recommend we allow them to use this material for berm material. From my observation it appears they will be using it on the north side of the landfarm. I am not sure if this is the external boundary or



not. If it is the external, then I recommend that a certain amount of compaction be designed into the berm.

Please let me know if you need any more info and the procedure to notify C&C.

Thanks!

cc: Jerry Sexton-District I Supervisor
Attachments-2

**EDDIE SEAY
CONSULTING**

601 W. ILLINOIS

HOBBS, NEW MEXICO 88240

(505) 392-2236

FAX (505) 392-6949

OIL CONSERVATION DIVISION
RECEIVED

94 JUN 17 AM 8 50

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



June 15, 1994

Ms. Kathy Brown
NMOCC
Box 2088
Santa Fe, NM 87504-2088

SUBJECT: C & C Landfarm, Inc.

Dear Kathy:

As we discussed a few weeks earlier, C & C would like to expand its boundaries to add an additional 40 acre tract to our facility.

This additional 40 acres is conjoined with the existing facility and only separated by our berms and buffer zone. The property is in Unit Letter B NW 1/4 NE 1/4. The property is deeded land owned by Jim Cooper and family, and all the offset landowners will be the same as on original application.

C & C will operate this property under the same conditions as stated in our original permit.

If additional information is needed or if you have questions, please call.

Sincerely,

Eddie W. Seay, Agent

EDDIE SEAY CONSULTING

601 W. ILLINOIS
HOBBS, NEW MEXICO 88240
(505) 392-2236
FAX (505) 392-6949

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



June 15, 1994

Mr. Wayne Price
NMOCC
P.O.Box 1980
Hobbs, NM 88240

SUBJECT: C & C Landfarm, Inc.

Dear Wayne:

As was discussed, C & C Landfarm, Inc., is receiving material from Enron Co. at our facility. The material which is being delivered for disposal is caliche with analysis below NMOCC guidelines for standards. C & C would like to use the material for additional berms within our landfarm area. We feel this will better utilize our space and the material will be within our permit area and will be monitored through our treatment zone.

Your consideration in this matter will be greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads 'Eddie W. Seay'. The signature is written in dark ink and has a long, sweeping tail that extends downwards and to the right.

Eddie W. Seay, Agent

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)
CLIENT : ENRON GAS ATI I.D.: 406339
PROJECT # : 002891
PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	940906 HOBBS 2 SP	NON-AQ	06/09/94	06/10/94	06/10/94	1
PARAMETER		UNITS			04	
BENZENE		MG/KG		<0.025		
TOLUENE		MG/KG		<0.025		
ETHYLBENZENE		MG/KG		0.099		
TOTAL XYLENES		MG/KG		0.22		
METHYL-t-BUTYL ETHER		MG/KG		<0.12		

SURROGATE:

BROMOFLUOROBENZENE (%) 102

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)
CLIENT : ENRON GAS ATI I.D.: 406339
PROJECT # : 002891
PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/10/94	1
02	940906 HOBBS 1 SP	NON-AQ	06/09/94	06/10/94	06/10/94	1
03	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/10/94	1

PARAMETER	UNITS	01	02	03
BENZENE	MG/KG	<0.025	<0.025	<0.025
TOLUENE	MG/KG	<0.025	<0.025	<0.025
ETHYLBENZENE	MG/KG	<0.025	<0.025	0.44
TOTAL XYLENES	MG/KG	<0.025	0.14	0.89
METHYL-t-BUTYL ETHER	MG/KG	<0.12	<0.12	<0.12

SURROGATE:

BROMOFLUOROBENZENE (%)	101	111	100
------------------------	-----	-----	-----

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	940906 HOBBS 1 NP	NON-AQ	06/09/94	06/10/94	06/11/94	5
02	940906 HOBBS 1 SP	NON-AQ	06/09/94	06/10/94	06/11/94	5
03	940906 HOBBS 2 NP	NON-AQ	06/09/94	06/10/94	06/13/94	20
PARAMETER			UNITS	01	02	03
FUEL HYDROCARBONS			MG/KG	1700	1500	6100
HYDROCARBON RANGE				C12-C36	C16-C36	C9-C36
HYDROCARBONS QUANTITATED USING				DIESEL	DIESEL	DIESEL

SURROGATE:

O-TERPHENYL (%)	126	116	NA*
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*SURROGATE RECOVERY NOT OBTAINABLE DUE TO SAMPLE DILUTION

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED

CLIENT : ENRON GAS

ATI I.D.: 406339

PROJECT # : 002891

PROJECT NAME : C & C

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	940906 HOBBS 2 SP	NON-AQ	06/09/94	06/10/94	06/11/94	S

PARAMETER	UNITS	04
FUEL HYDROCARBONS	MG/KG	2300
HYDROCARBON RANGE		C9-C36
HYDROCARBONS QUANTITATED USING		DIESEL

SURROGATE:

O-TERPHENYL (%)

83



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



CERTIFIED - RETURN RECEIPT

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

January 26, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

Mr. Jimmie T. Cooper
C&C Landfarm, Inc.
Box 55
Monument, NM 88265

Re: Reeves v. OCC & C&C Landfarm, Inc.
Lea County District Court
Case CV 93-247

Dear Mr. Cooper:

Elsie Reeves, Trent Stradling and S-W Cattle Company have filed in the above case a petition for review of the Oil Conservation Commission order which approved your permit to operate a land farm in Lea County. You were served with a summons in that appeal in November of 1993.

The Commission filed its response on June 24, 1993. As of this date you have not filed a response to the petition. Apparently you have not even contacted Mr. Carr, or anyone else, to represent you in the case.

C&C Landfarm, Inc., is the real party in interest in this case. If you do not respond to the petition, the Commission will not spend its time and resources to defend the decision. The District Court has set a docket call for February 4, 1994 in Lovington. **You must enter an appearance through counsel and respond to the petition by that date, and your attorney must appear at the docket call, or the Commission will advise the Court that it does not intend to further participate in the proceeding.**

If you do not act, it is likely that the Court will reversing the Commission order, in which case your permit will be withdrawn, and you will be required to close the landfarm. Therefore it is very important that you participate in this case.

If you retain an attorney, please have him contact the Division immediately.

Sincerely,

Robert G. Stovall,
Division Counsel

xc: W. Thomas Kellahin, Esq.
C. Gene Samberson, Esq.
William F. Carr, Esq.

OCD FILES

35MM DRAWINGS

NM 1012

FILE NUMBER

General Correspondence (YRS) 2007-1992

DOCUMENT TYPE

1

NO OF DWGS

14

BOX

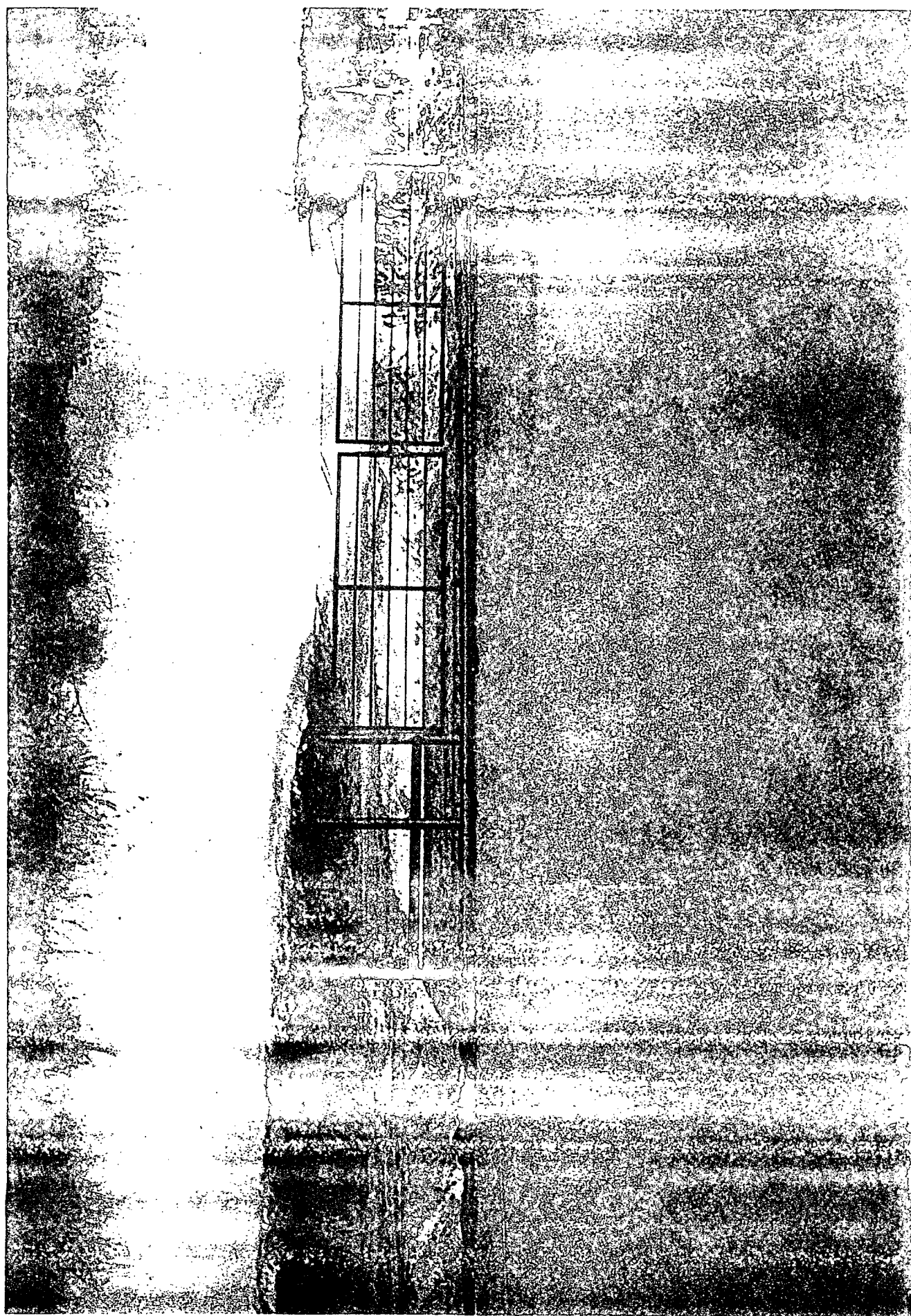
S-W CATTLE CO.

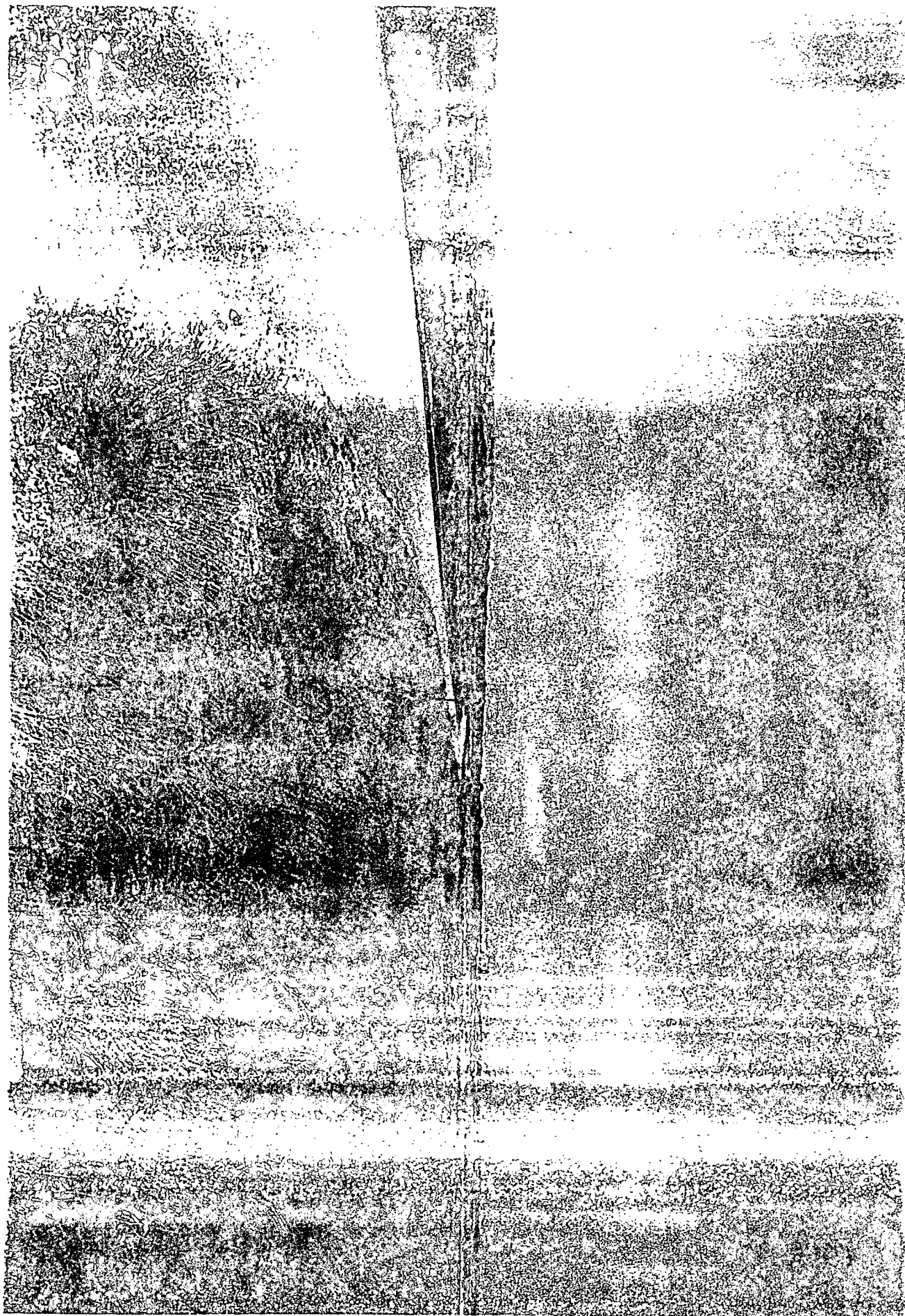
P.O. BOX 1799
HOBBS, NEW MEXICO 88241

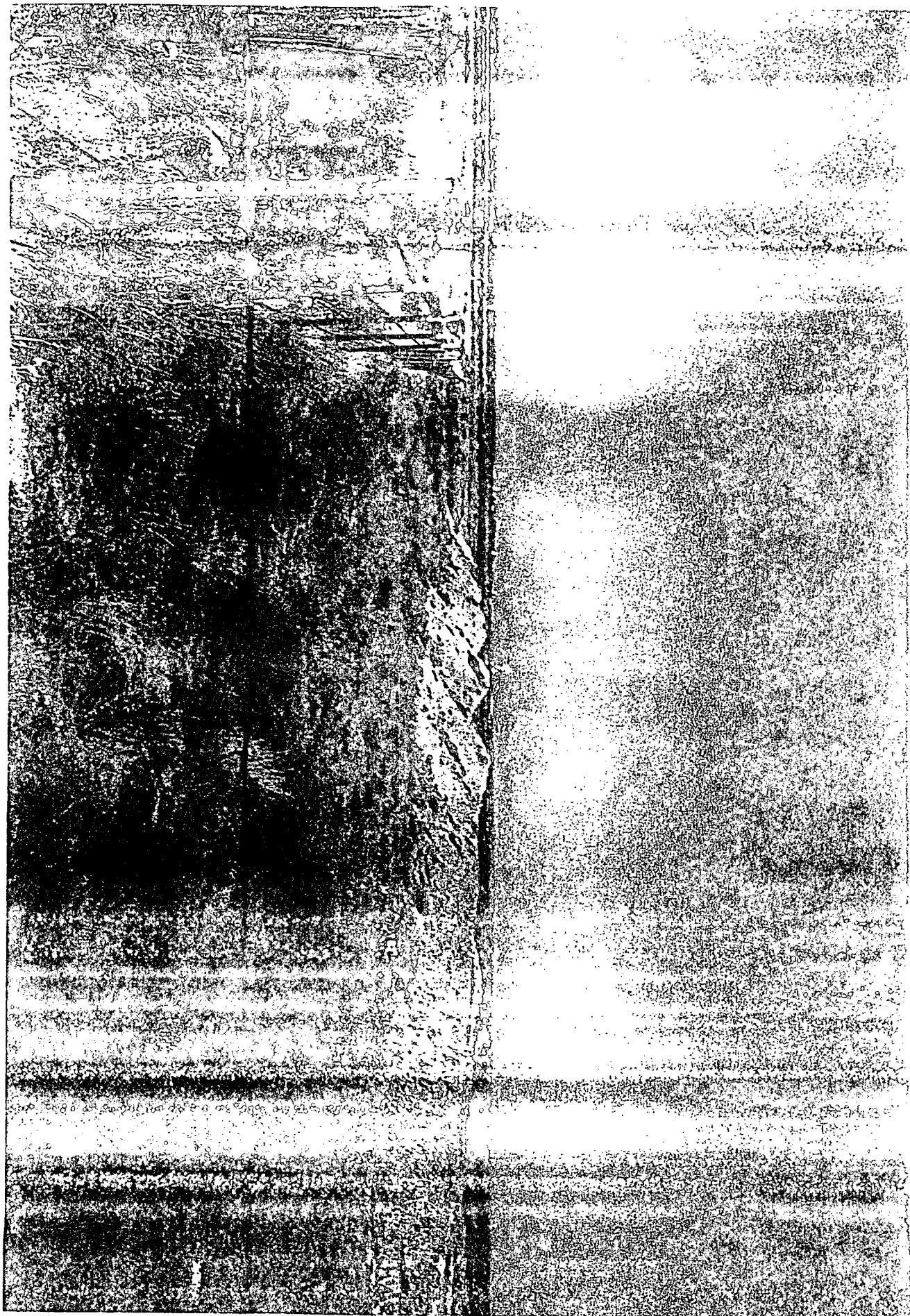
Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507
Submitted By: S-W Cattle
Hearing Date: 2/25/93

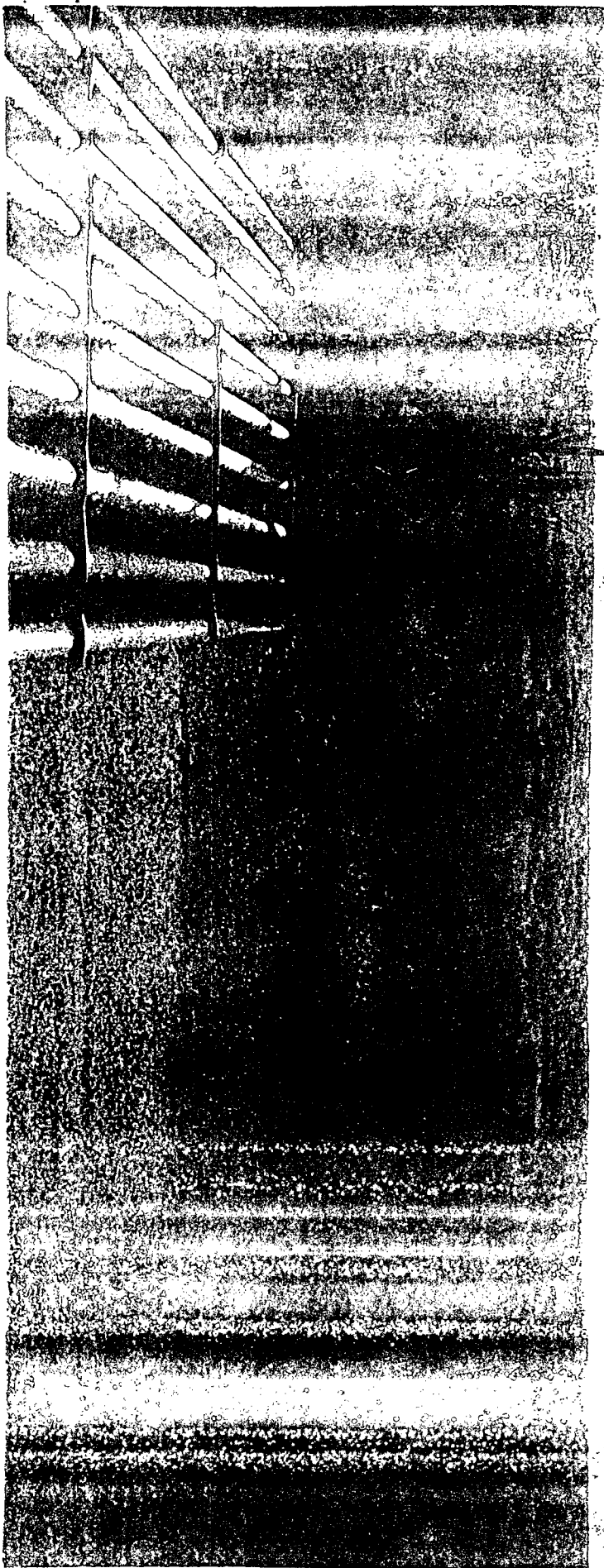
Information(Clarification) of Photographs:

- #1 - Entrance to Cooper Facility. Photograph from East to West.
- #2 - S-W Cattle Co. State Land with gravel pit. Photograph from southeast corner of Cooper to the south.
- #3 - Photograph from southeast corner of Cooper to the west.
- #4 - Photograph from southeast corner of Cooper to the east.
- #5 - Photograph from southeast corner of Cooper to the north.
- #6 - Photograph of Cooper Facility from southeast corner showing decline of terrain to the west and southwest.
- #7 - East monitor hole.
- #8 - Middle monitor hole which is locate approximately 700' from southeast corner of Cooper Facility. Shows the decline of terrain and a draw that runs north and south - to the S-W Cattle Co. windmill.
- #9 - Photograph from middle monitor hole to the northeast.
- #10 - Southwest monitor hole on Cooper Facility.
- #11 - Southwest monitor hole photograph from southwest corner of Cooper to the northeast.
- #12 - Photograph from southwest corner of Cooper Facility to the west showing north - south draw.
- #13 - S-W Cattle Company windmill. Photograph taken from southwest corner of Cooper.
- #14 - S-W Cattle Company windmill. Photograph taken from southeast corner of Cooper Facility.
- #15 - Photograph of Cooper Facility taken from dry hole on BLM land (Conoco -Britt B23).
- #16 - Photograph of windmill taken from dry hole on BLM land.
- #17 - Photograph from windmill to northeast.



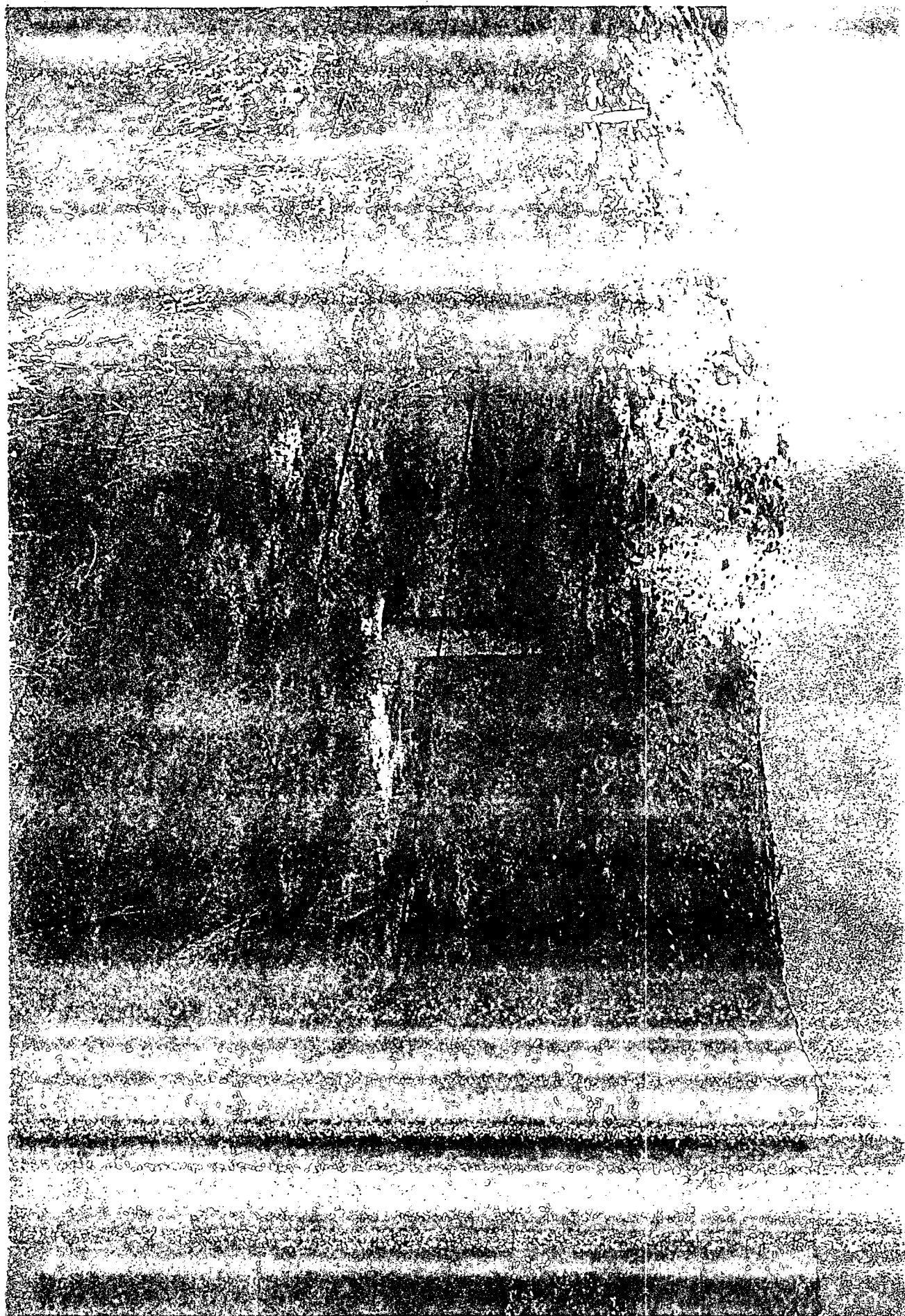


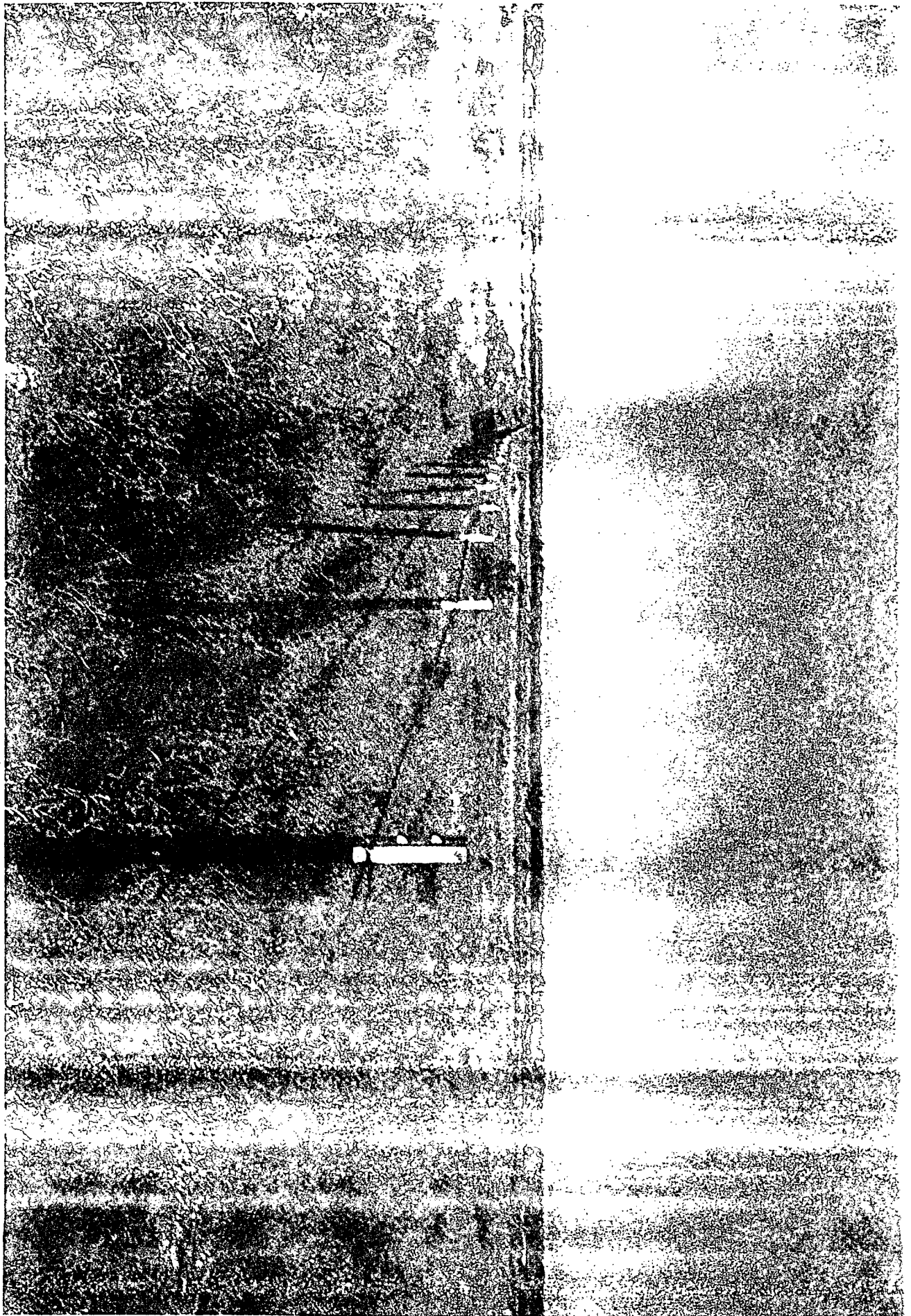


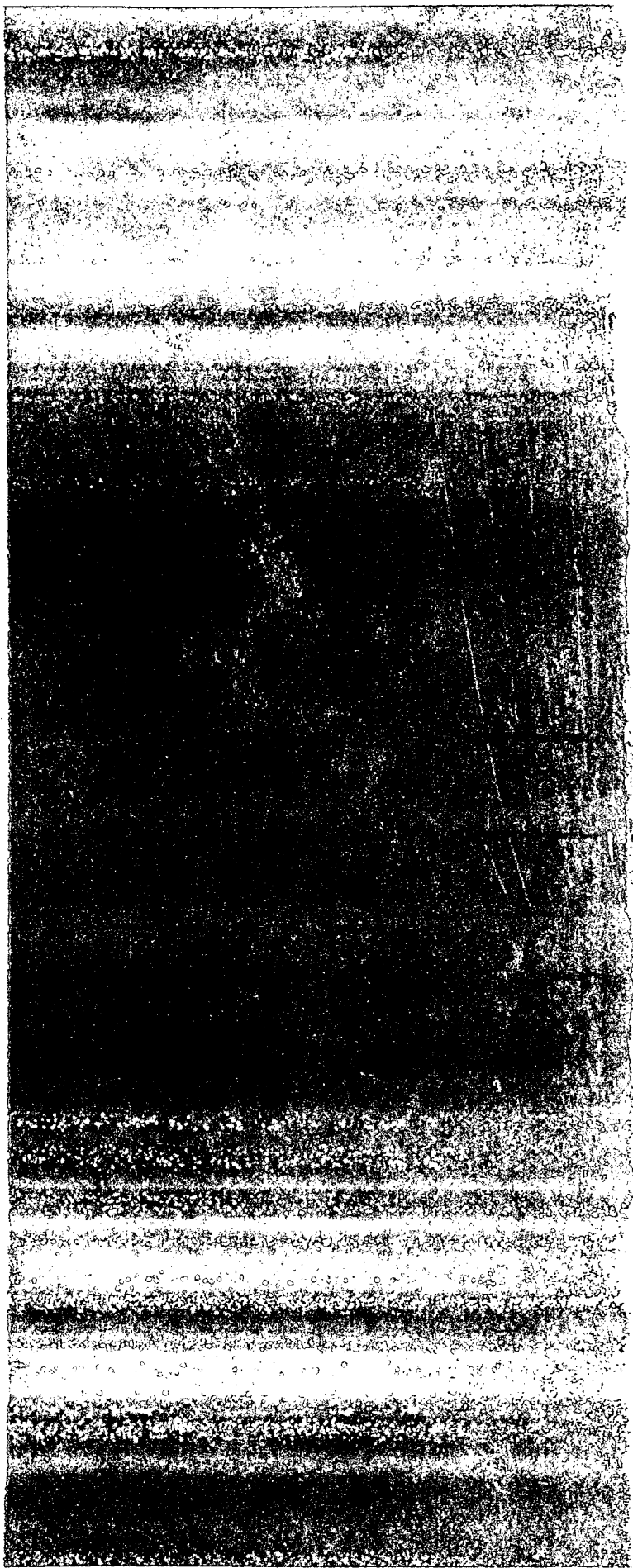


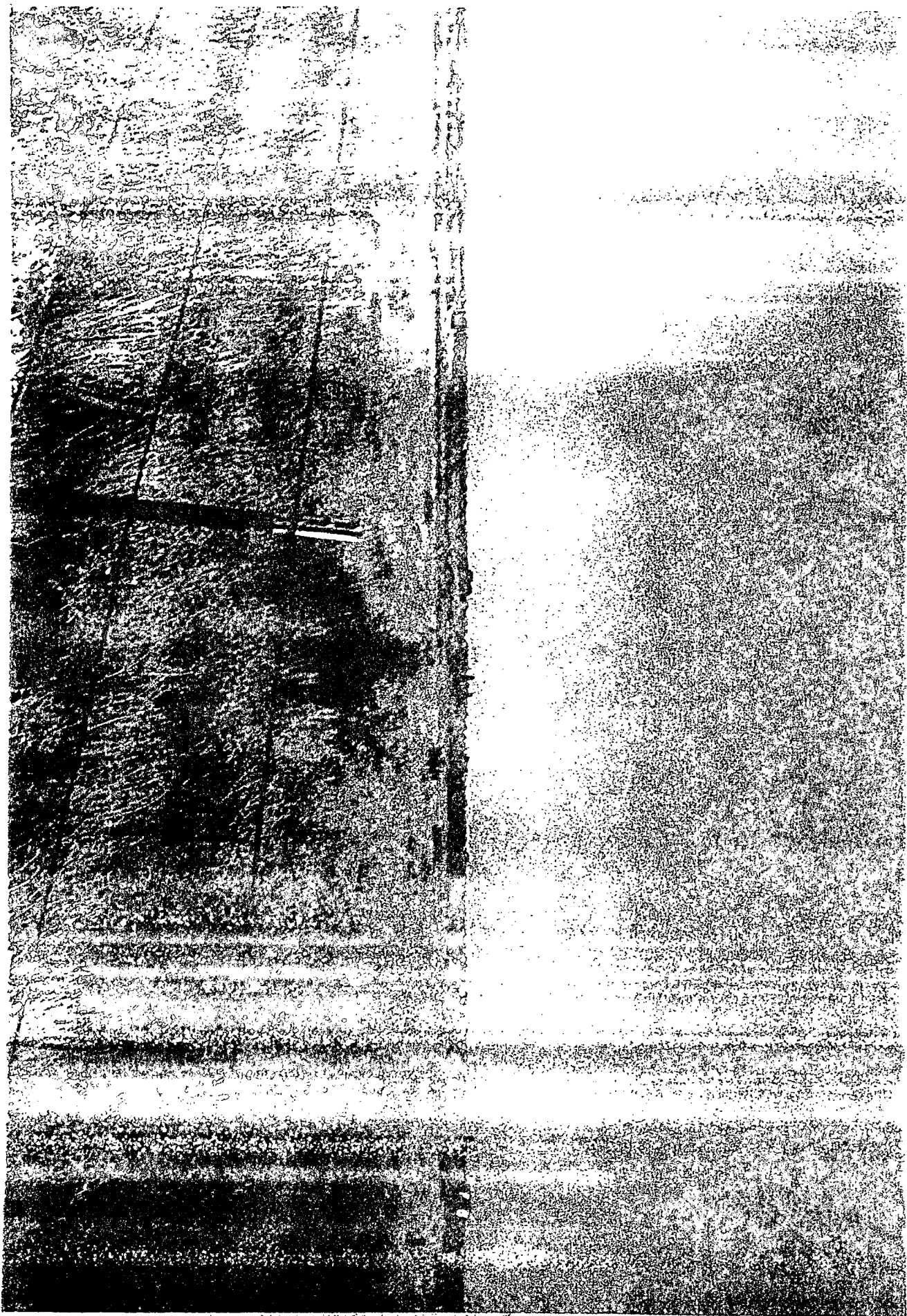


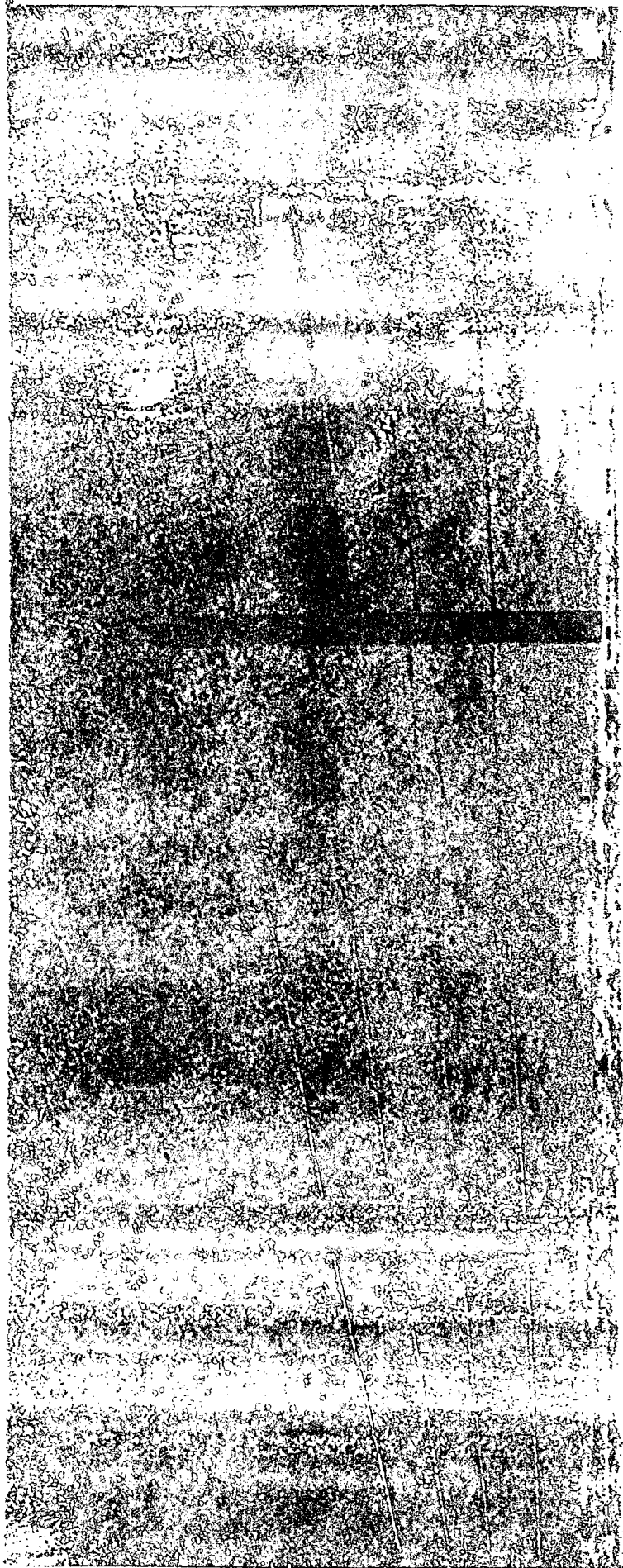


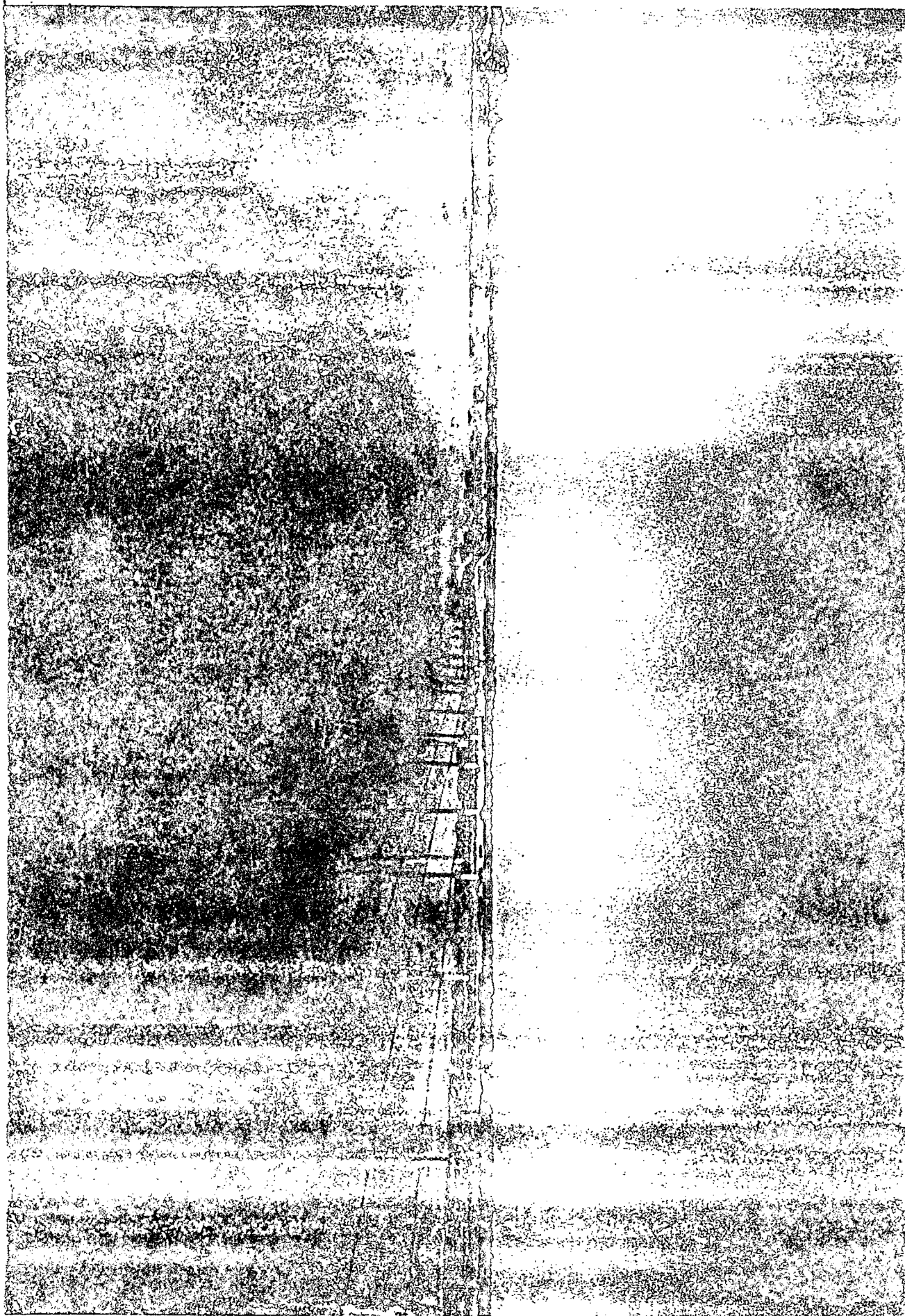


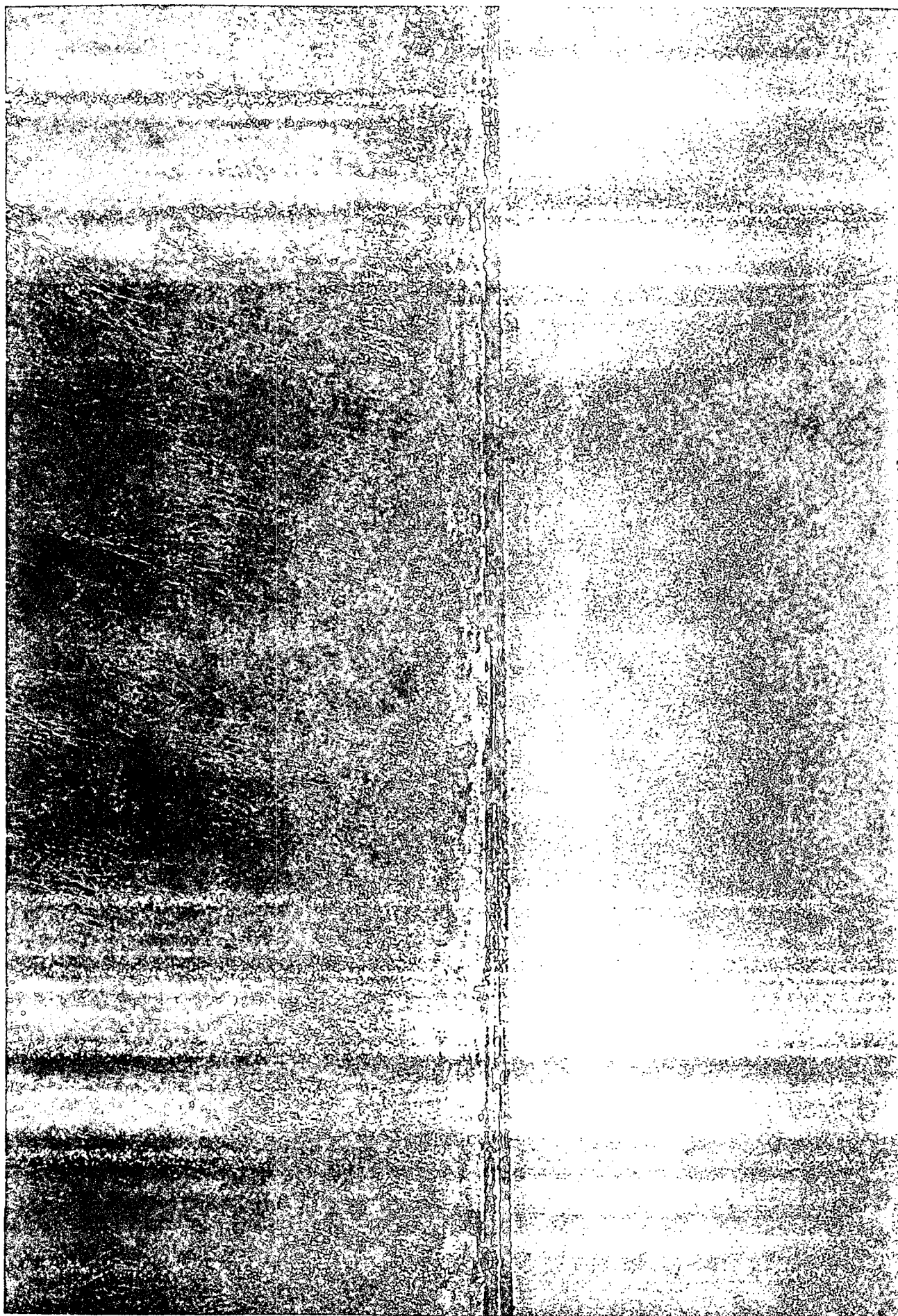


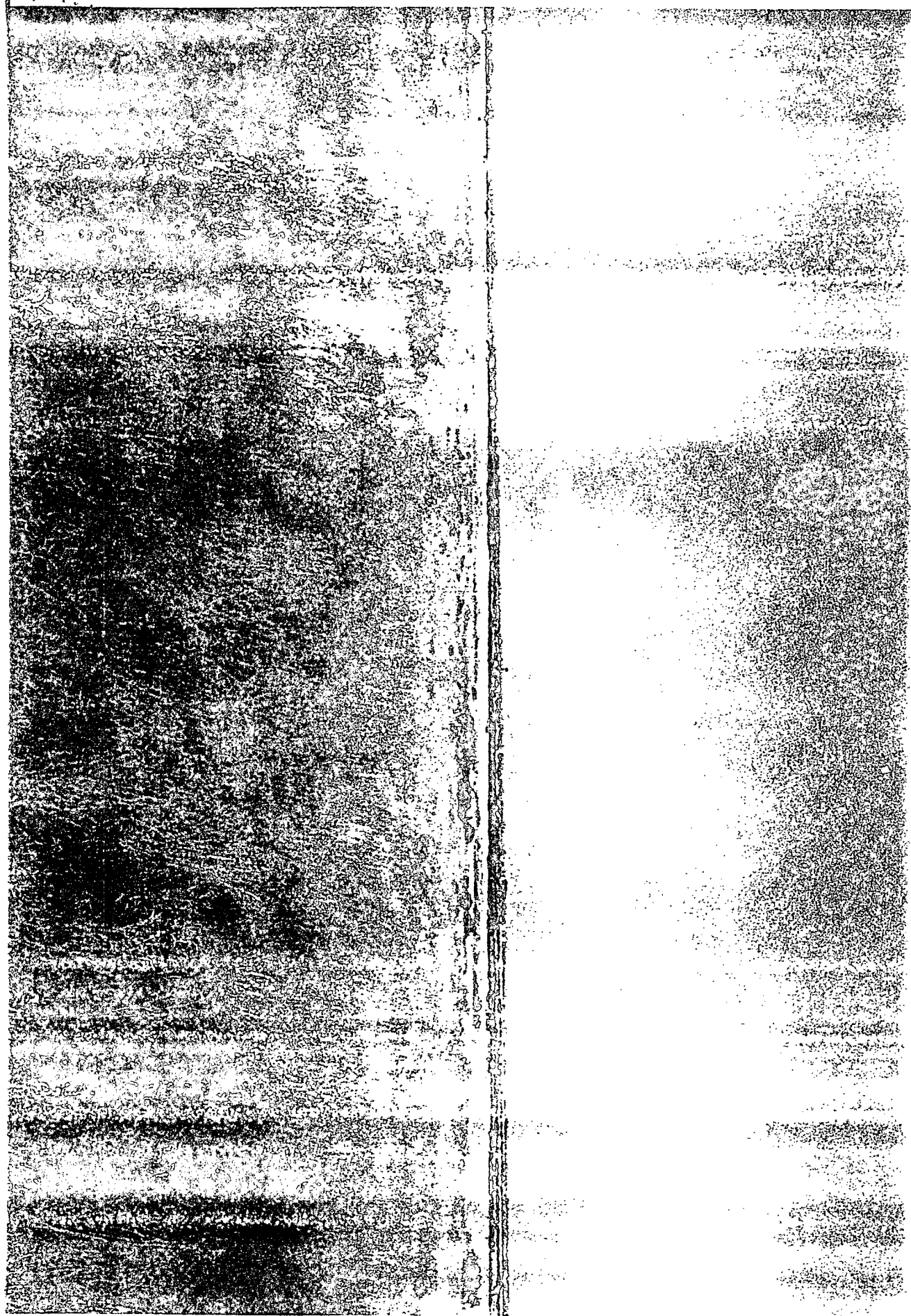


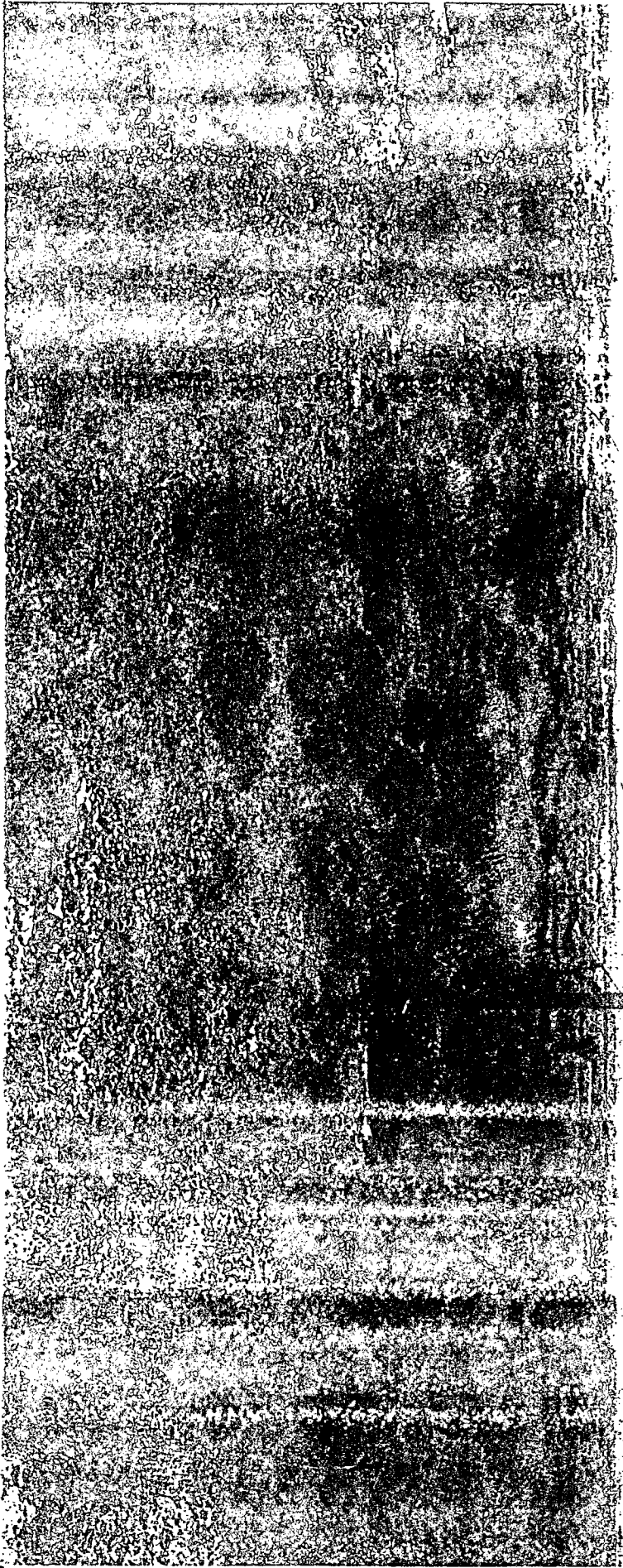




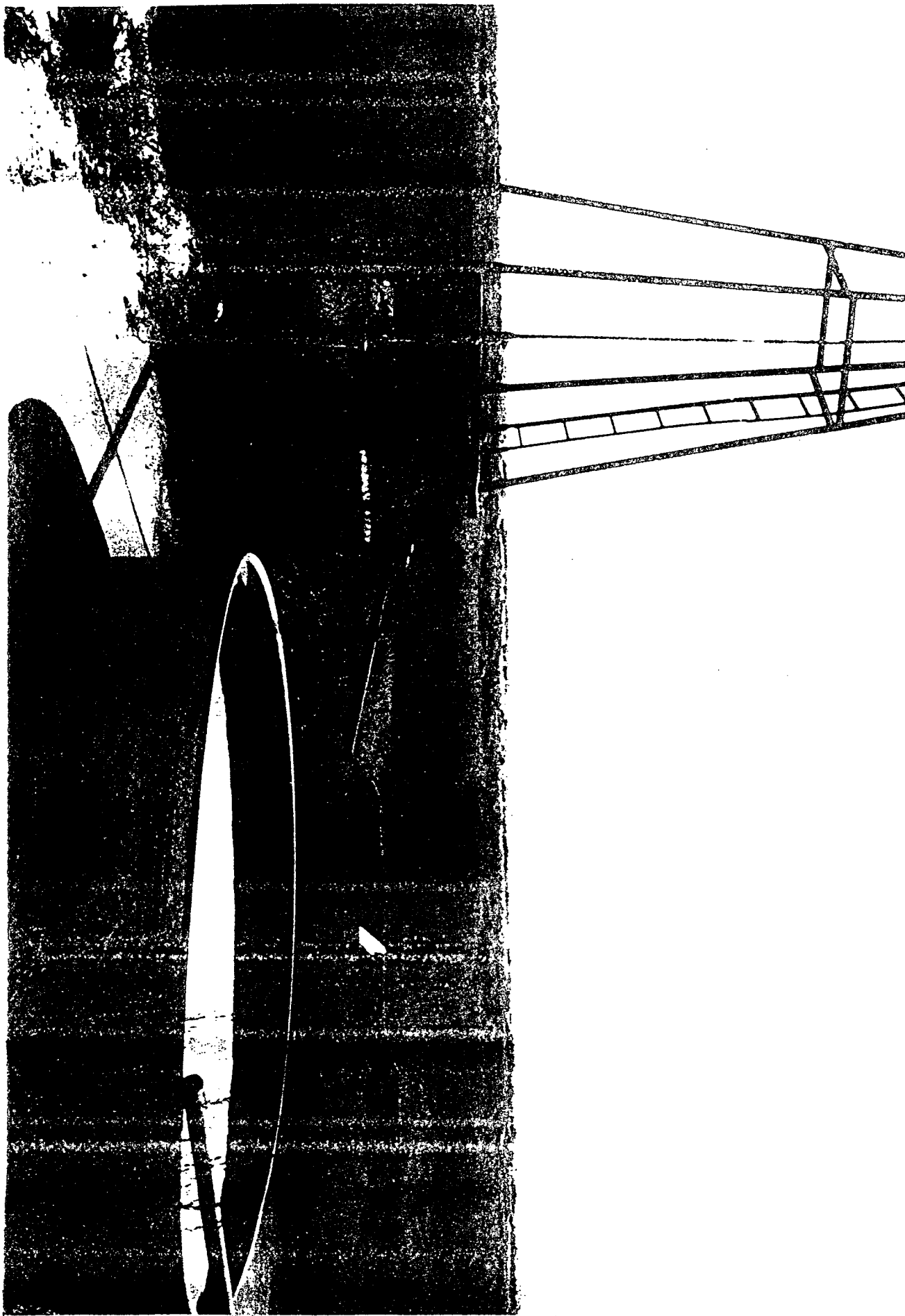






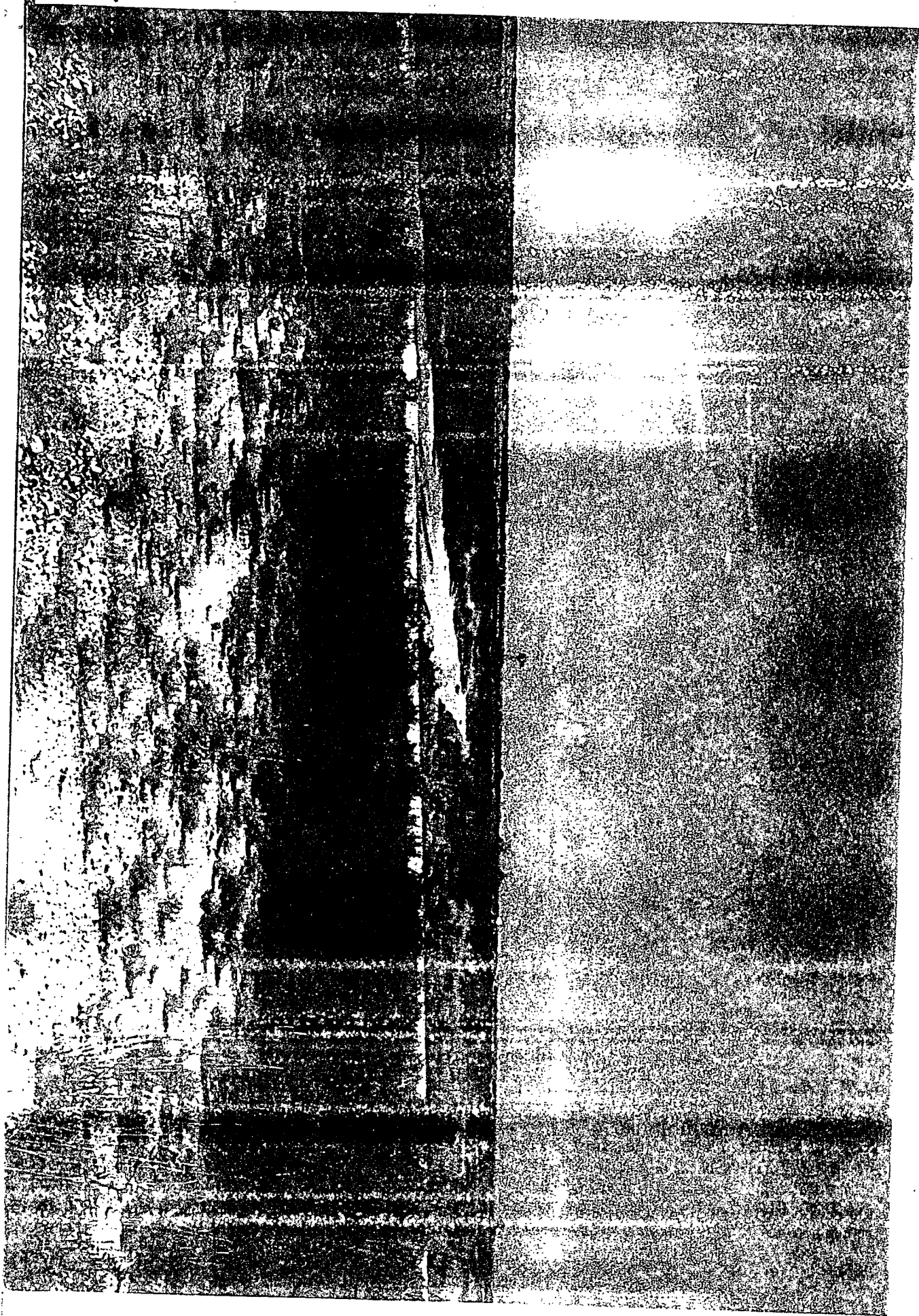


11-11-11

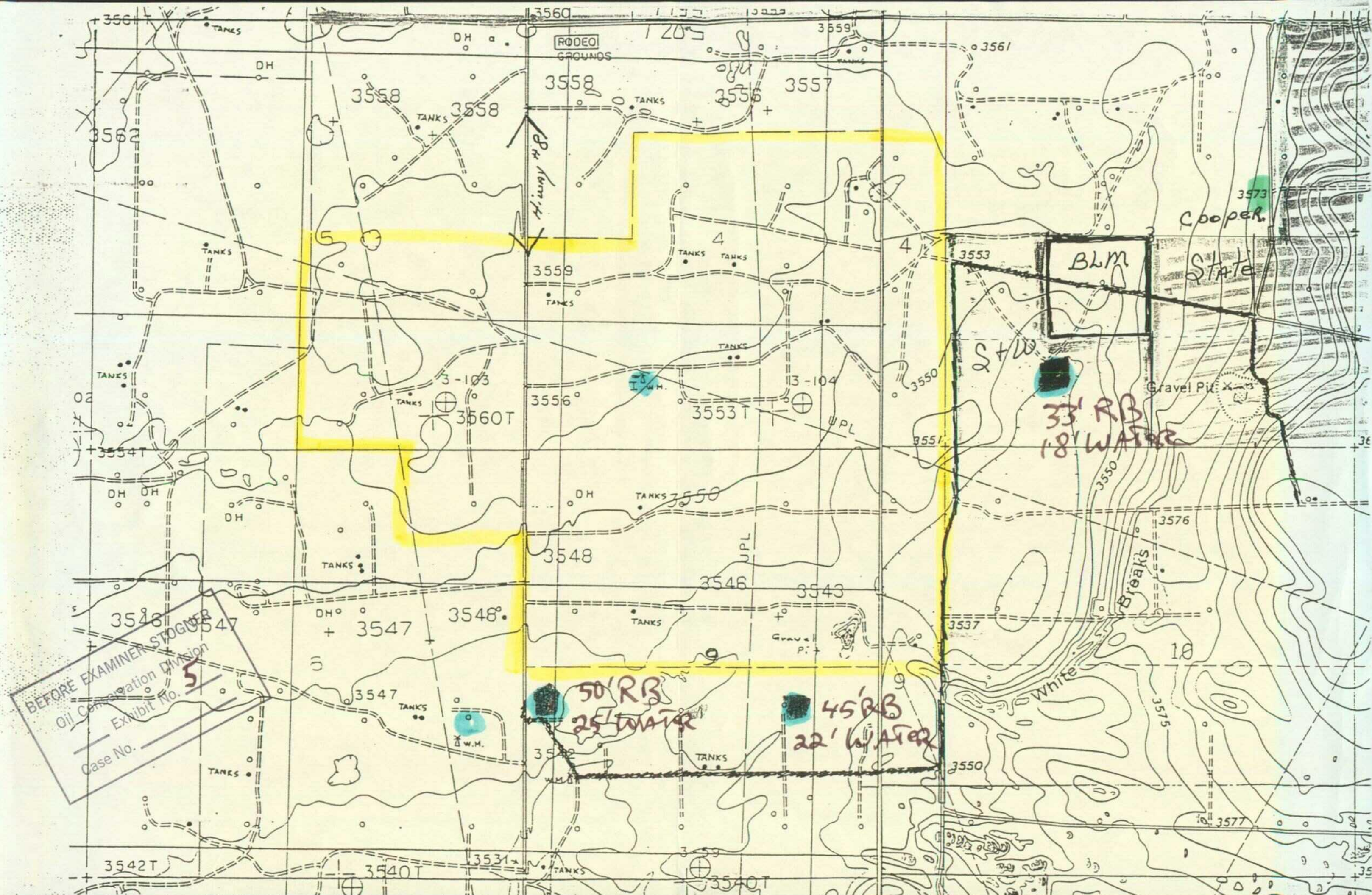


17





71



**Water Wells Near the Facility
with Depth to Water Level in Feet**

Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 7
Submitted By: S-W CATTLE - REEVES
Hearing Date: FEB. 25, 1993

Township 19 South, Range 37 East:

#1	Sec 33.4132	Water Level 39'
#2	Sec 33.41341	Water Level 35'
#3	Sec 33.434	Water Level 29'
#4	Sec 33.442122	Water Level 23'
#5	Sec 33.442142	Water Level 31'
#6	Sec 33.44322	Water Level 42'
#7	Sec 33.44323	Water Level 31'
#8	Sec 33.44441	Water Level 42'
#9	Sec 33.444411	Water Level 31' ✓
#10	Sec 34.111114	Water Level 22'
#11	Sec 34.11140	Water Level 30'
#12	Sec 34.11223	Water Level 35'
#13	Sec 34.11233	Water Level 24'
#14	Sec 34.11233	Water Level 20'
#15	Sec 34.112333	Water Level 24'
#16	Sec 34.112334	Water Level 23'
#17	Sec 34.1124	Water Level 36'
#18	Sec 34.11243	Water Level 35'
#19	Sec 34.11323	Water Level 24'
#20	Sec 34.12133	Water Level 36'
#21	Sec 34.31313	Water Level 25'
#22	Sec 34.3441	Dry

Township 20 South, Range 37 East:

#23	Sec 3.11100	Water Level 37'	
#24	Sec 3.1130	Water Level 55'	
#25	Sec 3.13100	Water Level 37'	
#26	Sec 3.14000	Water Level 40'	
#27	Sec 3.21000	Water Level 540'	
#28	Sec 3.212434	Water Level 541'	
#29	Sec 3.221344	Water Level 541'	
#30	Sec 3.31100	Water Level Unknown	
#31	Sec 3.33300	Water Level 28'	
#32	Sec 3.34131	Water Level 15'	
#33	Sec 4.111311	Water Level 30'	
#34	Sec 4.111312	Water Level 29'	
#35	Sec 4.14000	Water Level 70'	3440
#36	Sec 4.22100	Water Level 37'	3515
#37	Sec 4.221321	Water Level 31'	
#38	Sec 4.312434	Water Level 29'	
#39	Sec 4.42000	Water Level 35'	3518
#40	Sec 4.44411	Water Level 20'	
#41	Sec 9.112114	Water Level 34'	
#42	Sec 9.112122	Water Level 29'	
#43	Sec 9.21000	Water Level Unknown	
#44	Sec 9.31113	Water Level 25'	
#45	Sec 9.33122	Water Level 13'	
#46	Sec 9.41411	Water Level 30'	
#47	Sec 10.11000	Water Level Unknown	

SECTION 33

Township 19 South, Range 37 East

#1

STATE ENGINEER OFFICE
WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Joe R. Williams Owner's Well No. _____
Street or Post Office Address Box 215
City and State Monument, NM 88265

Well was drilled under Permit No. L-9681 and is located in the:
a. SW $\frac{1}{4}$ NW $\frac{1}{4}$ ~~SW~~ $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 33 Township 19S Range 37E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor Joe R. Williams License No. WD-1078
Address Box 215, Monument, NM 88265
Drilling Began February, 1986 Completed February, 1986 Type tools Cable Tool Size of hole 12" in.
Elevation of land surface or 3,200* at well is 3200+- ft. Total depth of well 52 ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 39 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
39	52	13	Water sand and gravel	10 g./min.

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
10	steel				10		0	

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
0					

Section 5. PLUGGING RECORD

Plugging Contractor 0
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____
State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received July 22, 1986 Quad _____ FWL _____ FSL _____
File No. L-9681 Use STOCK Location No. 19.37.33.4132

SE 4 ADJUTANT GEN'L

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Joe R. Ahlman
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

#2

WELL RECORD

FIELD LOG. LOG

Section 1. GENERAL INFORMATION

(A) Owner of well Joe R. Williams Owner's Well No. _____
Street or Post Office Address P. O. Box 2051
City and State Albuquerque, New Mexico. 87103

Well was drilled under Permit No. L-7513-S-2 and is located in the:

a. W $\frac{1}{4}$ SE $\frac{1}{4}$ $\frac{1}{4}$ of Section 33 Township 19S Range 37E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor Gade Oldaker License No. WD-657

Address P. O. Box 2321, Hobbs, New Mexico, 88240

Drilling Began 4/24/80 Completed 4/25/80 Type tools rotary Size of hole 10 $\frac{1}{2}$ in.

Elevation of land surface or 3650 at well is 3650 ft. Total depth of well 45 ft. ✓

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 35 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
35	45	10	Water, Sand	25 GPM

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6 5/8			0	45	45	none	25	45

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
		10 $\frac{1}{2}$			

Section 5. PLUGGING RECORD

Plugging Contractor _____

Address _____

Plugging Method _____

Date Well Plugged _____

Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received June 23, 1980

Quad _____ FWL _____ FSL _____

File No. L-7513-S-2

Use IRR.

Location No. 19.37.33.41341

[illegible]

68 JUN 23 4 44 PM '88

STATE ENGINEER OFFICE
ROSWELL, N.M. OFFICE

Steve Coleman
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

STATE ENGINEER OFFICE
WELL RECORD

FIELD ENGINEER LOG

#3

Section 1. GENERAL INFORMATION

Owner of well Edward E. & Cynthia A. Webb Owner's Well No. _____
Street or Post Office Address _____
City and State Monument New Mexico

Well was drilled under Permit No. 283-1 and is located in the:

a. SE 1/4 SW 1/4 S 1/4 of Section 42 Township 14-2 Range 31 E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor 2-Buds Drilling Co. License No. W 12940
Address Box 822 Hobbs NM
Drilling Began 7/18/81 Completed 7/22/81 Type tools Rotary Size of hole 1 7/8 in.
Elevation of land surface or _____ at well is _____ ft. Total depth of well 43' ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 29' ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>29'</u>	<u>43'</u>	<u>14</u>	<u>Water sand</u>	<u>206 p.m.</u>

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>5 1/2</u>			<u>+19 holes-</u>	<u>43'</u>	<u>44'</u>	<u>open</u>	<u>24'</u>	<u>43'</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
<u>1</u>			
<u>2</u>			
<u>3</u>			
<u>4</u>			

FOR USE OF STATE ENGINEER ONLY

Date Received August 3, 1981

Quad _____ FWL _____ FSL _____

File No. L-8501

Use DOM & STK Location No. 19.37.33.434

Sec 33, T19N, R37E SE 1/4 SW 1/4 SE 1/4

[illegible]

STATE ENGINEER
ROSWELL, NM
AUG 3 8 33 AM '91

Oscar L. Jacobson
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

#4

ANNUAL OBSERVATION WELL WATER LEVELS - NEW MEXICO - FEB. 14, 1990

PAGE 629

COUNTY	FORMATION	SASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVA	TATUM-LOV.-HOSES	19 S 37 E33.442122	UNKNOWN	3563.00	30.

UNIQUE NUMBER IS 256000012900:430 WINDMILL 42M. CSG. DEPTH MEAS. 30 FT.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
JAN. 29 1976	22.62						

COUNTY	FORMATION	SASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVA	TATUM-LOV.-HOSES	19 S 37 E33.44.411	COY COYAL	3559.20	90.

UNIQUE NUMBER IS 256000012237:12R. WELL WITH 16 IN. CSG. TURBINE PUMP & NAT. GAS ENGINE. FILE L-744-S.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
FEB. 23 1961	24.01	FEB. 13 1966	30.37	JAN. 20 1971	27.15	JAN. 29 1976	23.57
FEB. 13 1966	30.69					JAN. 20 1981	29.96

#9

STATE ENGINEER OFFICE

WELL RECORD

#5

Section 1. GENERAL INFORMATION

(A) Owner of well Coy H. Noy Owner's Well No. _____
Street or Post Office Address P. O. Box 132
City and State Junice, New Mex. 88231

Well was drilled under Permit No. L-744-S-3 and is located in the:

a. 1/4 NW 1/4 1/4 of Section 33 Township 19-S Range 37 N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208

Address P. O. Box 74 Oil Center. N. M. 88266

Drilling Began July 21, 1976 Completed July 22, 1976 Type tools spudder Size of hole 10 in.

Elevation of land surface or _____ at well is 30 ft. Total depth of well 50 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 27 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>27</u>	<u>30</u>			
<u>31</u>	<u>36</u>	<u>5</u>	<u>course sand.</u>	<u>70</u>

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>8</u>	<u>welded</u>		<u>0</u>	<u>50</u>	<u>50</u>	<u>none</u>	<u>34</u>	<u>50</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
<u>1</u>			
<u>2</u>			
<u>3</u>			
<u>4</u>			

FOR USE OF STATE ENGINEER ONLY

Date Received September 14, 1977

Quad _____ FWL _____ FSL _____

File No. L-744-S-3 Use SUPPL. IRR. Location No. 19.37.33. 442142

Sec 33 T19N R47E S6 SE NE NE NE NE NE

[illegible]

77 SEP 14 AM 8 19
STATE ENGINEER OFFICE
MOBILE, ALA.
NO

W. L. Kim
Diller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

STATE ENGINEER OFFICE

WELL RECORD

#6

Section 1. GENERAL INFORMATION

(A) Owner of well Joe R. Williams Owner's Well No. L-9127
Street or Post Office Address Box 215
City and State Monument, New Mexico 88265

Well was drilled under Permit No. L-9127 and is located in the:

a. SW $\frac{1}{4}$ SE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 33 Township 19-S Range 37-E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor Joe R. Williams License No. WD-1078

Address Box 215, Monument, New Mexico 88265

Drilling Began August 84 Completed December 1 84 Type tools Rotary Size of hole 9 in.

Elevation of land surface or _____ at well is 3562 ft. Total depth of well 52' ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 40' ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
42'	48'	6'	Sand and Gravel	10 gal./min.

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6"			2' above S.	52'			36'	52'

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

State Engineer Representative

FOR USE OF STATE ENGINEER ONLY

Date Received February 11, 1985 Quad _____ FWL _____ FSL _____

File No. L-9127 Use DOM & D & S Location No. 19.37.33.44322

See 33 Top Profile SE 1/4 SE 1/4 SW 1/4

[illegible]

STATE ENGINEER
ROSWELL, NM
FEB 11 8 28 AM '85

Joe L. Williams
Driller

WELL RECORD

Ran

#2

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

--	--	--	--

(A) Owner of well Makin Drilling Co.Street and Number Box 1628City Hobbs State New MexicoWell was drilled under Permit No. 33 and is located in the1/4 SE 1/4 SE 1/4 of Section 33 Twp. 19 S Rge. 37 E(B) Drilling Contractor Ed. Burke License No. WD-111

--	--	--	--

Street and Number Box 306City Hobbs State New MexicoDrilling was commenced Dec. 2 19 57Drilling was completed Dec. 2 19 57

(Plat of 640 acres)

Elevation at top of casing in feet above sea level _____ Total depth of well 72State whether well is shallow or artesian Shallow Depth to water upon completion 31

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	31	44	13	Brown water sand
2	44	55	11	Red water sand
3	55	67	7	Brown water sand
4				
5				

Section 3

RECORD OF CASING

Dia. in.	Pounds ft.	Threads in	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To
7	19	10	0	621-8"	621-8"	none	221-8"	621-8"

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				

Section 5

PLUGGING RECORD

Name of Plugging Contractor _____ License No. _____

Street and Number _____ City _____ State _____

Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____

Plugging method used _____ Date Plugged _____ 19 _____

Plugging approved by: _____

Cement Plugs were placed as follows:

Basin Supervisor _____

FOR USE OF STATE ENGINEER ONLY	
Date Received	DEC 11 1957
File No. <u>L-3738</u>	Use <u>O.S.D.</u>
Location No. <u>19-37-33-440</u>	

No.	Depth of Plug		No. of Sacks Used
	From	To	

44323

Sec. 33 T19 R37 SE4 SE4 SW4

LOG OF WELL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

Edward P. Burke
Well Driller

STATE ENGINEER OFFICE
WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

#8

(Plat of 640 acres)

(A) Owner of well A A S. 2 Miles
Street and Number Box 4 - 24
City Hobbs State N.M.
Well was drilled under Permit No. 744 E.P.R. and is located in the
N. 1/4 1/4 of Section 33 Twp. 19 S Rge. 37 E
(B) Drilling Contractor W. G. Sullivan License No. 134
Street and Number 312 North Fourth
City Hobbs State N.M.
Drilling was commenced 1-12 1958
Drilling was completed 2-12 1958

Elevation at top of casing in feet above sea level _____ Total depth of well 83
State whether well is shallow or artesian Shallow Depth to water upon completion 42

Section 2 PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	<u>42</u>	<u>50</u>	<u>8</u>	<u>Light grey sand</u>
2				
3				
4				
5				

Section 3 RECORD OF CASING

Dia in.	Pounds ft.	Threads in	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To

Section 4 RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				
		<u>12"</u>			

Section 5 PLUGGING RECORD

Name of Plugging Contractor _____ License No. _____
Street and Number _____ City _____ State _____
Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____
Plugging method used _____ Date Plugged _____ 19 _____
Plugging approved by: _____ Cement Plugs were placed as follows:

Basin Supervisor _____

FOR USE OF STATE ENGINEER ONLY

Date Received FEB 11 1959

OFFICE
GROUND WATER SUPERVISOR
ROOM 111, NEW MEXICO

File No. 2-744 Use Exp. Location No. 19.37.33.100

No.	Depth of Plug		No. of Sacks Used
	From	To	

SECTION 34

Township 19 South, Range 37 East

		FORMATION		BASIN NAME		LOCATION		OWNER		ALTITUDE		DEPTH	
COUNTY													
LEA		ALVA		TATUM-LOV.-HOBBS		19 S 37 E34.111114		V. O. SETTLER		NW ⁴ NW ⁴ NW ⁴		3577.00	-

UNIQUE NUMBER IS 256000012632:STOCK WELL WITH WINDMILL.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
JAN. 03 1974	22.33	JAN. 06 1975	22.12	JAN. 13 1976	20.07A	JAN. 07 1977	20.05A
JAN. 03 1983	21.62						13.35

#13

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	SOIL	TATUM-LOV.-HOBBS	19 S 37 E34.11233	V. O. SETTLER	NW ⁴ NW ⁴ NE ⁴	3576.00

UNIQUE NUMBER IS 256000013233:EXP. WELL, UNCASED & UNEQUIPPED. PLUGGED BY 1972.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
JAN. 20 1971	23.53						

#15

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	SOIL	TATUM-LOV.-HOBBS	19 S 37 E34.112333	M. O. SHAW	NW ⁴ NW ⁴ NE ⁴	3577.30

UNIQUE NUMBER IS 256000012233:EXP. WELL WITH TURBINE PUMP & ELEC. MOTOR. L-743.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
APR. 13 1965	24.14	JAN. 20 1971	24.66	JAN. 29 1976	21.31	JAN. 20 1981	23.54
						FEB. 13 1986	24.01

#16

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	SOIL	TATUM-LOV.-HOBBS	19 S 37 E34.112333	M. O. SHAW	NW ⁴ NW ⁴ NE ⁴	3577.30

UNIQUE NUMBER IS 256000012233:EXP. WELL WITH 10 3/4 IN. OSS. TURBINE PUMP & LPS ENGINE. FILE L-743. WELL CAVED IN, 1965.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
FEB. 27 1961	21.02	FEB. 15 1966	22.52				

#11

STATE ENGINEER OFFICE
WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Tommy Evans & Eddy Evans Owner's Well No. _____
Street or Post Office Address General Delivery
City and State Monument, New Mexico 88265

Well was drilled under Permit No. L-8803 and is located in the:
a. NW $\frac{1}{4}$ NW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 34 Township 19S Range 37E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor Abbott Bros. Drilling License No. WD-46
Address P.O. Box 637, Hobbs, New Mexico 88240
Drilling Began 5/18/82 Completed 5/18/82 Type tools Cable Size of hole 12½ in.
Elevation of land surface or _____ at well is _____ ft. Total depth of well 41 ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 25 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
25	39	14		

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
5½	14	-0-	0	42	42	None	28	42

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____
State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received May 24, 1982 Quad _____ FWL _____ FSL _____
File No. L-8803 Use DOM. Location No. 19.37.34.111 40
Sec 34 T19S R37E NW¼NW¼ NW¼

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Murrell Abbott
Driller 21.8

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

(A) Owner of well _____ V. O. Setzler

(17) Owner of Well _____
Street and Number _____ 1117 Gulf _____
City _____ Hobbs, _____ State _____ New Mexico _____
Well was drilled under Permit No. 1-7413-S-2 and is located in the
_____ $\frac{1}{4}$ _____ $\frac{1}{4}$ _____ $\frac{1}{4}$ of Section _____ Twp. _____ Rge. _____
(B) Drilling Contractor _____ W. L. Van Noy _____ License No. _____ WD-208
Street and Number _____ P. O. Box 74 _____
City _____ Oil Center, _____ State _____ New Mexico _____
Drilling was commenced _____ May 14, _____ 19 72
Drilling was completed _____ May 14, _____ 19 72

Elevation at top of casing in feet above sea level..... Total depth of well.....^{46'}
State whether well is shallow or artesian..... Depth to water upon completion.....^{21'}

PRINCIPAL WATER-BEARING STRATA

RECORD OF CASING

RECORD OF MUDDING AND CEMENTING

PLUGGING RECORD

Cement Plugs were placed as follows:

Date Received 6-1-72

Location No. 19, 37, 34, 11223

Dec 34 T195 R37E NW⁴ NW⁴ NE⁴

Section 6

LOG OF WELL

[illegible]

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

W. L. Văn Ngý.

Well Driller

WELL CR. LOG

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

--	--	--	--

(A) Owner of well Shaw Brothers
Street and Number 507 South Shipp St.
City Hobbs State New Mexico
Well was drilled under Permit No. L- 743 and is located in the
N 1/4 NW 1/4 1/4 of Section 34 Twp. 19 S Rge. 37 E
(B) Drilling Contractor O.R. Musslewhite License No. WD 99
Street and Number Box 56
City Hobbs State New Mexico
Drilling was commenced July 25 19 57
Drilling was completed July 25 19 57

#11

(Plat of 640 acres)

Elevation at top of casing in feet above sea level _____ Total depth of well 40
State whether well is shallow or artesian shallow Depth to water upon completion 20

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	23	25	2	Sand rock
2	33	38	5	Sand & gravel
3				
4				
5				

Section 3

RECORD OF CASING

Dia in.	Pounds ft.	Threads in	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To
10	18	none	0	10	10	none	none	

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				

Section 5

PLUGGING RECORD

Name of Plugging Contractor _____ License No. _____
Street and Number _____ City _____ State _____
Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____
Plugging method used _____ Date Plugged _____ 19 _____
Plugging approved by: _____ Cement Plugs were placed as follows:

No.	Depth of Plug		No. of Sacks Used
	From	To	

Basin Supervisor

FOR USE OF STATE ENGINEER ONLY

Date Received AUG 23 1957

OFFICE
GROUND WATER SUPERVISOR
ROSWELL, NEW MEXICO

File No. L-743 Use Aggr & Dam Location No. 19.37.34.182-33

Sec 34, T19S, R37E NW1/4 NW1/4 NE1/4 SW1/4 SW1/4

LOG OF WELL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

O. R. Musselwhite
Well Driller

STATE ENGINEER OFFICE

#17

WELL RECORD

Section 1. GENERAL INFORMATION

W. O. & D. C. Shaw % V. O. Setzler
(A) Owner of well P. O. Box 205 Owner's Well No. _____
Street or Post Office Address Monument, New Mex. 88265
City and State _____

Well was drilled under Permit No. L-743-S-4 and is located in the:
a. ~~XXXX~~ XXW NE $\frac{1}{4}$ NW 34 Township 19-S Range 37-E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.
d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208
Address P. O. Box 74 Oil Center, New Mex. 88266
Drilling Began Feb. 27, 1978 Completed Feb. 28, 1978 Type tools spudder Size of hole 10 in.
Elevation of land surface or _____ at well is _____ ft. Total depth of well 40 ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 20 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
36	40	4	fine water sand.	

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6 5/8	welded		0	40 40	40	none	30 30	40

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 10, 1978Well No. L 07 Mon-3-89-3

Quad _____ FWL _____ FSL _____

SUPPLEMENTAL

File No. L-743-S-4Use IRR.Location No. 19.37.34.1124Sec 34 T19S R31E NW $\frac{1}{4}$ NW $\frac{1}{4}$ NE $\frac{1}{4}$

[illegible]

78 MAR 10 AM 8 19
STATE ENGINEER OFFICE
PORTLAND, N.M.

W. R. Kimzey
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1

--	--	--	--

(A) Owner of well V. O. Setzler
1117 Gulf
Street and Number
Hobbs, New Mexico 88240
City New Mexico State
Well was drilled under Permit No. L-743-5 and is located in the

#18

1/4 1/4 1/4 of Section Twp. Rge.
(B) Drilling Contractor W. L. Van Noy License No. WD-208
P. O. Box 74
Street and Number

--	--	--	--

Oil Center, State New Mex.
City
Drilling was commenced May 15, 1972
May 15, 1972
Drilling was completed

(Plat of 640 acres)

Elevation at top of casing in feet above sea level Total depth of well 46'
State whether well is shallow or artesian Depth to water upon completion 21'

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	0	45	10	Water sand & gravel
2				
3				
4				
5				

Section 3

RECORD OF CASING

Dia in.	Pounds ft.	Threads in	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To
6 1/2		welded	0	46	46		28	45

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet		Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To				

Section 5

PLUGGING RECORD

Name of Plugging Contractor License No.
Street and Number City State
Tons of Clay used Tons of Roughage used Type of roughage
Plugging method used Date Plugged 19
Plugging approved by: Cement Plugs were placed as follows:

Basin Supervisor

FOR USE OF STATE ENGINEER ONLY

Date Received 6 - 1 - 72

File No. L-743-5 Use ERR Location No. 19.37.34. 11243

No.	Depth of Plug		No. of Sacks Used
	From	To	

Dec 34 1995 R-376 11243 NE4

Section 6

LOG OF WELL

[illegible]

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

W. L. Van Noy.

Well Driller

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well James Dowell Owner's Well No. _____
Street or Post Office Address Box 211
City and State Monument, N. M. 88265

Well was drilled under Permit No. L-9768 and is located in the:
a. 1/4 1/4 1/4 1/4 of Section 34 Township 19 S Range 37 E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.
d. _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor B & A Water Well Service License No. WD 764
Address Box 129, Lovington, N. M. 88260
Drilling Began 11/18/85 Completed 12/19/85 Type tools Spudder Size of hole 10 in.
Elevation of land surface or _____ at well is _____ ft. Total depth of well 39 ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 24 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>24</u>	<u>39</u>	<u>17</u>	<u>Sand Clay gravel</u>	<u>not tested</u>

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>6</u>	<u>PVC</u>		<u>-0-</u>	<u>39</u>			<u>29</u>	<u>39</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
	<u>None</u>				

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
<u>1</u>			
<u>2</u>			
<u>3</u>			
<u>4</u>			

FOR USE OF STATE ENGINEER ONLY

Date Received February 17, 1986 Quad _____ FWL _____ ESL _____
File No. L-9768 Use DOMESTIC Location No. 19.37.34.11323

See 34 1985 R-12

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

Gravel pack with 3 yds gravel.

1987-03-27

[illegible]

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

AP Lebar
Driller

INSTRUCTIONS: This form is to be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

STATE ENGINEER OFFICE

#20

WELL RECORD

FIELD LOG

Section 1. GENERAL INFORMATION

(A) Owner of well J. O. & D. C. Shaw % V. O. Setzler Owner's Well No. _____
Street or Post Office Address P. O. Box 205
City and State Monument, New Mex. 88265

Well was drilled under Permit No. L-743-S-3 and is located in the:

a. ~~SW~~ ^{NE} ~~W~~ ^W $\frac{1}{4}$ ~~NE~~ ^{NE} $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 34 Township 19-S Range 37-E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.

d. X _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208

Address P. O. Box 74 Oil Center, New Mexico 88266

Drilling Began Feb. 18, 1978 Completed Feb. 20, 1978 Type tools Spudder Size of hole 10 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 40 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 22 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet From	To	Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
36	40	4	fine water sand	

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6 5/8	welded		0	40	40		30	40

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet From	To	Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 10, 1978

Supplemental _____ FWL _____ FSL _____

File No. L-743-S-3 Use IRR. Location No. 19.37.34.12133

NW 1/4 NE 1/4

[illegible]

78 MAR 10 AM 8 19
STATE ENGINEER OFFICE
PORTLAND, N.M.
13

W. H. Van-Neay
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

#21

STATE ENGINEER OFFICE
WELL RECORD

FIELD BOOK 116

Section 1. GENERAL INFORMATION

(A) Owner of well Joe Williams Owner's Well No. _____
Street or Post Office Address 1330 Cenfial
City and State Alb. N. M., 87105

Well was drilled under Permit No. L-7513 -S and is located in the:
a. SW 1/4 NW 1/4 SW 1/4 of Section 34 Township 19S Range 37E N.M.P.M.
b. Tract No. _____ of Map No. _____ of the _____
c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in Lea County.
d. X _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor G. D. Oldaker, License No. WD-657
Address P. O. Box 2321, Hobbs, New Mexico, 88240
Drilling Began 12/15/79 Completed 12/ 17/79 Type tools rotary Size of hole 10 1/2 in.
Elevation of land surface or 3650 at well is 3650 ft. Total depth of well 44 ft.
Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 25 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
25	44	19	Water, Sand	25 GPM

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
6 5/8			0	44	44	none	25	44

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
		10 1/2			

Section 5. PLUGGING RECORD

Plugging Contractor _____
Address _____
Plugging Method _____
Date Well Plugged _____
Plugging approved by: _____
State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 12, 1980
Quad _____ FWL _____ FSL _____
File No. L-7513 -S Use IRR Location No. 19.37.34.31313

30-34 T19, R37E 30N4404 S01W 1/4

[illegible]

STATE ENGINEER OFFICE
ROSWELL, N.M.

12-4-18-01

John Anderson
Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section I(a) and Section 4 need be completed.

#22

STATE ENGINEER OFFICE

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Carlyle J. Hall Owner's Well No. 01
 Street or Post Office Address P.O. Box 163
 City and State Monument, NM 88265

Well was drilled under Permit No. L-10,166 and is located in the:

SE 1/4
 a. 1/4 SE 1/4 SW 1/4 of Section 34 Township 19S 50E Range 37 East N.M.P.M.
E1320', S330', W 1320', beginning, 10 ac
 b. Tract (to) _____ of Map No. _____ of the _____
 c. Lot No. _____ of Block No. _____ of the _____
 Subdivision, recorded in Lea County.
 d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
 the _____ Grant.

(B) Drilling Contractor W. L. Van Noy License No. WD-208

Address Box 7, Oil Center, NM 88266

Drilling Began 2-25-91 Completed 2-26-91 Type tools Cable Size of hole 8" in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 35 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well dry ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>dry</u>				

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>None</u>								

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____
 Address _____
 Plugging Method _____
 Date Well Plugged _____
 Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 17, 1992

Quad _____ FWL _____ FSL _____

File No. L-10,166 (1) (DRY HOLE)

Use DOM & STK

Location No. 19.37.34.3441

#1 19.37.34.3441

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

SECTION 3

Township 20 South, Range 37 East

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.11100

Owner: W. K. Byrom

J. W. Cooper "F" #2

Record of Casing: 10"

- 200'

Rotary

330' FNL - 4950' FEL

Elevation: 3558' TTH

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A' and Section 5 need be completed.

Section 1

812 FM	320 FOM	1100	1100
320 FOM	1100	1100	1100
1100	1100	1100	1100
1100	1100	1100	1100

(A) Owner of well Valma Pet. Corp.
 Street and Number Box 1914x 1955
 City Hobbs State New Mexico
 Well was drilled under Permit No. L-3107 and is located in the
950 ft. from N. Line, 330 from W. Line Section 3 Twp. 20N Rge. 38E
 (B) Drilling Contractor O. R. Musslewhite License No. WD99
 Street and Number Box 56
 City Hobbs State New Mexico
 Drilling was commenced Feb. 16 1956
 Drilling was completed Feb. 17 1956

(Plot of 640 acres)

Elevation at top of casing in feet above sea level _____ Total depth of well 80 ft.
 State whether well is shallow or artesian Shallow Depth to water upon completion 25 ft.

Section 2

PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation
	From	To		
1	5	65	10	Aqueous rock, white
2				
3				
4				
5				

Section 3

RECORD OF CASING

Dia. in.	Threads ft.	Threads in	Depth		Feet	Type Shoe	Perforations	
			Top	Bottom			From	To
65/8	20	8	0	80	80	None	60	80

Section 4

RECORD OF MUDDING AND CEMENTING

Depth in Feet	Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
From	To			

Section 5

PLUGGING RECORD

Name of Plugging Contractor _____ License No. _____
 Street and Number _____ City _____ State _____
 Tons of Clay used _____ Tons of Roughage used _____ Type of roughage _____
 Plugging method used _____ Date Plugged _____ 19____
 Plugging approved by: _____ Cement Plugs were placed as follows:

No.	Depth of Plug		No. of Sacks Used
	From	To	

Basin Supervisor
 FOR USE OF STATE ENGINEER ONLY
 JUL 2 1956
 OFFICE
 GROUND WATER SUPERVISOR
 ROSWELL, NEW MEXICO

File No. L-3107 Use P.W.D. Location No. 205.38.3.224

20.37.3.1130 ✓

LOG OF WELL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

O. R. Musselwhite
Well Driller

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.13100'

Elevation: 3558' TC

Owner: W. K. Byrom

L. W. Cooper G #3

Record of Casing: 16" - 135'

Cable

1650' RH. -- 330' FWL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.14000

Owner: W. K. Byrom

J. W. Cooper "B" #1

Record of Casing: 20" - 75'

10" - 250'

Cable 8" - 200'

Casting pulled

1980' FNL - 1980' FWL

Elevation: 3560' GL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.21000

Elevation: 3563' TC

Owner: M. K. Byrom

J. W. Cooper "C" #1

Record of Casing: 16" - 75'

$$8\frac{1}{2}'' = 200'$$
$$5\frac{1}{2}'' - 200$$

Casting pulled

Cable

660' FEL. 1980' FEL.

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.212434

Elevation: -- 3563 Tg 0

Owner: W. K. Byrom

J. W. COOPER #3

Record of Casing: 8 5/8" - 1338'

Rotary

660' FNL - 1550' FEL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS. This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.3.221344

Elevation: 3573' DF.

Owner: Shell Oil Co.

State #1

Record of Casing: 8 5/8" - 1843'

Cable

660' FNL - 990' FEL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

[illegible]

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Elevation: 3560' TTH

Ellen Weir Com. #1

Record of Casing: 10 3/4" - 255'

Rotary

2310' FSL - 310' FWL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

location: 20.37.3.33300

Elevation: 3559' CL

Owner: W. H. Byrom

J. W. Cooper "A" #1

Record of Casing: 16" - 130'

Cable

330' FSL - 330' FWL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

#32

COUNTY	FORMATION	BASIN NAME	LOCATION	Sec 3	OWNER	ALTITUDE	DEPTH
EA	ALVN	TATUM-LOV.-HOBBS	20 S 37 E03.34131		W. B. WALKER	SW ⁴ SE ⁴ NW ⁴	3545.10

LIQUE NUMBER IS 256000010429:USED STOCK WELL WITH 7 IN. CSG & WINDMILL.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
OR. 01 1954	19.34	FEB. 27 1954	14.28	MAR. 08 1960	13.23	APR. 10 1963	17.873	JAN. 14 1971	13.098
IN. 29 1976	11.91	FEB. 12 1981	12.13	MAR. 25 1986	-14.87				

SECTION 4

Township 20 South, Range 37 East

#40

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVM	TATUM-LOV.-H0585	20 S 37 E04.44411	UNKNOWN	3552.30	30.

UNIQUE NUMBER IS 256000013122:UNUSED SRO WELL WITH 2 5/8 IN. CSG, OPEN HOLE.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
APR. 01 1954	23.46	SEP. 18 1967	20.36				

#34

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVM	TATUM-LOV.-H0585	20 S 37 E04.111312	UNKNOWN	3559.00	

UNIQUE NUMBER IS 256000013122:1:ASD. DOMESTIC WELL WITH 6 5/8 IN. CSG & SUBM. PUMP

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
FEB. 11 1901	29.26						

#33

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVM	TATUM-LOV.-H0585	20 S 37 E04.111331	UNKNOWN	3559.00	

UNIQUE NUMBER IS 256000010430:ABANDONED STOCK WELL WITH 10 IN. CSG & WINDMILL.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
FEB. 27 1961	29.17	FEB. 15 1968	32.26	APR. 10 1968	30.63	JAN. 14 1971	29.45
FEB. 11 1981	28.61					JAN. 29 1976	25.62

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

location: 20.37.4.14000

Elevation: 3570' DF

Owner: Getty Oil Co.

M. E. Laughlin: #1

Record of Casing: 13"

- 212 -

Rocary

1980' FNL - 1980' FWL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 4 need be completed.

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 40.37.4.22100

Elevation: 3654' GL.

Author: W. L. Byrom

W. Cooper "E" #1

Record of Casing: 12 $\frac{1}{2}$ " - 166'
10" - 640'

Cable

100' 1111. 000' FEL.

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired, or deepened. When this form is used as a plugging record, only Section 1(a) and Section need be completed.

#37

PAGE 675

COUNTY	FORMATION	EASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALYN	TATUM-LOV.-HOBBS	20 S 37 E04.221321	KOLLAR AND LANE NE NE NE	3553.80	45.

UNIQUE NUMBER IS 256000010431:STOCK WELL WITH 7 IN. CSG & WINDMILL.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
APR. 02 1954	30.258	FEB. 27 1961	26.12	MAR. 03 1966	30.46	APR. 10 1968	27.30
JAN. 29 1970	24.02	FEB. 12 1981	30.06	MAR. 25 1986	31.13	JAN. 14 1971	27.74

#38

COUNTY	FORMATION	SASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	OGEL	TATUM-LOV.-HOBBS	20 S 37 E04.312424	UNKNOWN <i>See Note 1E*</i>	3557.00	48.

UNIQUE NUMBER IS 256000013023:UNUSED OWD WELL WITH 8 5/8 IN. CSG, UNEQUIPPED.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
APR. 02 1954	32.70	SEP. 14 1967	29.40				

[illegible]

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Elevation: 3553' GL

Humble Laughlin Battery 2 #2

Record of Casing: 16" - 190'

Rotary

1980' FSL - 660' FEL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section need be completed.

SECTIONS 9 AND 10

Township 20 South, Range 37 East

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH	
LEA	ALVN	TATUM-LOV. - TOES	20 S 37 E09.112114	W.H. LAUGHLIN	3553.00	53.	
UNIQUE NUMBER IS 2560000012262:LAUGHLIN. 188. DUG WELL. DIAM 4X6 FT. DEPTH 53 FT. MEAS DISC. TIMBER IN WELL. WELL A-5. L-38.							
DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
JUL. 25 1939	37.62	AUG. 17 1939	37.50	SEP. 19 1939	37.37	OCT. 16 1939	37.85
DEC. 17 1939	37.45	JAN. 16 1940	37.42	FEB. 03 1940	37.30	MAR. 10 1940	37.25
MAY. 12 1940	37.15	JUN. 15 1940	37.43	JUL. 13 1940	37.50	AUG. 25 1940	37.83
OCT. 16 1940	37.22	NOV. 17 1940	37.65	DEC. 22 1940	37.69	JAN. 26 1941	37.33
MAR. 15 1941	38.30	APR. 16 1941	37.05	JUN. 10 1941	37.05	JUL. 17 1941	35.44
NOV. 22 1941	31.38	FEB. 05 1942	30.01	MAR. 30 1942	28.97	AUG. 13 1941	27.91
OCT. 22 1942	37.52	NOV. 30 1942	27.45	JAN. 22 1943	27.13	SEP. 27 1942	26.39
JUL. 22 1943	37.69	SEP. 29 1943	28.30	NOV. 30 1943	28.33	MAY. 25 1943	28.24
MAY. 15 1944	37.59	JUL. 23 1944	28.81	SEP. 21 1944	28.39	MAR. 24 1944	28.69
MAR. 31 1945	28.36	MAY. 23 1945	28.41	JUL. 27 1945	27.97	JAN. 12 1945	29.56
JAN. 31 1946	29.43	MAR. 21 1946	29.25	MAY. 23 1946	29.68	NOV. 21 1945	30.26
NOV. 25 1946	29.77	JAN. 17 1947	29.44	MAR. 26 1947	29.08	SEP. 25 1946	30.90
SEP. 12 1947	30.19	NOV. 17 1947	30.44	JAN. 16 1948	31.12	JUL. 25 1947	28.90
JUL. 25 1948	30.31	SEP. 25 1948	31.12	NOV. 16 1948	31.78	MAY. 21 1947	31.13
MAY. 21 1949	30.90	JUL. 26 1949	31.66	SEP. 22 1949	31.78	MAR. 25 1948	31.34
MAR. 25 1950	30.20	MAY. 13 1950	30.85	JUL. 20 1950	31.36	JAN. 18 1949	31.45
JAN. 21 1951	31.23	MAR. 23 1951	31.13	MAY. 22 1951	31.20	NOV. 20 1950	31.52
NOV. 20 1951	32.14	JAN. 03 1952	32.12	MAR. 21 1952	32.02	SEP. 19 1951	32.27
SEP. 17 1952	33.22	NOV. 16 1952	33.17	JAN. 07 1953	33.04	JUL. 22 1952	32.56
JUL. 21 1953	33.74	SEP. 03 1953	34.01	NOV. 16 1953	33.94	MAY. 22 1953	33.38
MAY. 07 1954	32.80	JUL. 13 1954	32.79	SEP. 14 1954	33.07	MAR. 01 1954	32.86
MAR. 19 1955	32.40	MAY. 22 1955	32.43	JUL. 15 1955	33.09	JAN. 06 1955	32.60
JAN. 06 1956	32.59	MAR. 14 1956	32.34	MAY. 09 1956	32.25	NOV. 28 1955	32.93
NOV. 30 1956	33.54	JAN. 12 1957	33.35	MAR. 06 1957	33.01	SEP. 06 1956	33.69
JAN. 15 1958	33.59	MAR. 18 1958	33.15	JUN. 25 1958	32.25	SEP. 11 1957	33.66
MAR. 10 1959	33.16	JUN. 02 1959	31.14	SEP. 15 1959	31.36	JAN. 19 1959	31.76
JUN. 02 1960	31.63	SEP. 01 1960	30.66	JAN. 18 1961	29.29	MAR. 25 1960	31.13
SEP. 11 1961	30.60	JAN. 16 1962	29.69	MAR. 29 1962	29.60	JUN. 27 1961	28.91
FEB. 18 1963	30.21	SEP. 23 1963	28.01	FEB. 19 1964	28.31	OCT. 02 1962	29.12
SEP. 13 1965	31.22	FEB. 15 1966	20.30			FEB. 19 1965	30.22

COUNTY		BASIN NAME		LOCATION		OWNER		ALTITUDE		DEPTH	
LA		ALVM		TATUM-LOV. - CROSS		20 S 37 E09.112122		W.H. LAUGHLIN		NW 1/4 NE 1/4	
UNIQUE NUMBER IS 2536000010270		LAUGHLIN. DUG UNUSED WELL, UNEQUIPPED. DIAM 4X6 FT. MEAS DISC. WAS IRR. WELL. PREV LOC .110A. WELL		E 1/4						3554.00	
DATE		WATER LEVEL		DATE		WATER LEVEL		DATE		WATER LEVEL	
1941		37.12		JUN. 10		35.81		JUL. 17		34.52	
1942		29.15		JUL. 28		27.07		SEP. 27		26.35	
1942		26.84		MAR. 30		26.06		MAY. 26		26.23	
1943		27.46		JAN. 16		27.46		MAR. 24		27.17	
1944		29.03		NOV. 27		28.45		JAN. 12		27.85	
1945		27.70		SEP. 22		28.54		NOV. 21		28.76	
1946		26.50		JUL. 22		29.47		SEP. 26		29.63	
1947		26.55		MAY. 21		28.11		JUL. 25		28.91	
1947		29.53		MAR. 25		29.33		MAY. 24		29.70	
1948		30.26		JAN. 18		30.30		MAR. 22		30.15	
1949		30.34		NOV. 16		30.55		JAN. 18		30.20	
1971		27.78		FEB. 11		28.49		MAR. 21		29.22	

[illegible]

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 2 need be completed.

#44

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVM	TATUM-LOV.-HOBBS	20 S 37 E09.31113	UNKNOWN SW NW NW	3545.50	63.

UNIQUE NUMBER IS 25G0000010435: Cased open hole diam. 7 in. construction, 1976;

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
DEC. 02 1966	26.54	APR. 10 1968	26.83	JAN. 15 1971	25.07		

#45

COUNTY	FORMATION	BASIN NAME	LOCATION	OWNER	ALTITUDE	DEPTH
LEA	ALVM	TATUM-LOV.-HOBBS	20 S 37 E09.33122	PAUL SUCANAN SW NW NW	3534.00	-

UNIQUE NUMBER IS 25G0000010435: USED STOCK WELL WITH 7 in. CSG 3 WINDMILL.

DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL	DATE	WATER LEVEL
MAR. 22 1954	18.16	FEB. 25 1961	16.03	MAR. 03 1966	16.573	JAN. 18 1971	15.36
FEB. 11 1961	12.81	MAR. 31 1966	12.79				
FEB. 18 1941	37.12	APR. 16 1941	36.20	JUN. 10 1941	35.81	JUL. 17 1941	34.52
FEB. 05 1942	29.13	MAR. 30 1942	26.19	JUL. 28 1942	27.07	SEP. 27 1942	26.35
NOV. 29 1942	26.64	JAN. 22 1943	26.36	MAR. 30 1943	26.06	MAY. 26 1943	26.23
SEP. 29 1943	27.46	NOV. 30 1943	27.50	JAN. 15 1944	27.46	MAR. 24 1944	27.17
JUL. 25 1944	28.03	SEP. 21 1944	28.23	NOV. 27 1944	28.45	JAN. 12 1945	27.85
MAY. 25 1945	27.70	JUL. 27 1945	29.60	SEP. 22 1945	28.84	NOV. 21 1945	28.76
MAR. 21 1946	28.50	MAY. 23 1946	28.39	JUL. 22 1946	29.47	SEP. 26 1946	29.63
JAN. 17 1947	28.55	MAR. 26 1947	28.30	MAY. 21 1947	28.11	JUL. 25 1947	28.91
NOV. 17 1947	29.58	JAN. 16 1948	29.55	MAR. 25 1948	29.33	MAY. 24 1948	29.70
SEP. 25 1948	30.20	NOV. 16 1948	30.32	JAN. 18 1949	30.30	MAR. 22 1949	30.15
JUL. 26 1949	30.84	SEP. 22 1949	30.96	NOV. 16 1949	30.53	JAN. 18 1950	30.20
JAN. 16 1971	27.78	JAN. 30 1976	24.41	FEB. 11 1981	28.49	MAR. 21 1986	29.22

STATE ENGINEER OFFICE

#46

WELL RECORD

Section 1. GENERAL INFORMATION

(A) Owner of well Trent Stradley Owner's Well No. _____
Street or Post Office Address Box 549
City and State Hobbs, N.M. 88240

Well was drilled under Permit No. L-10,150 and is located in the:

a. 1/4 1/4 NW 1/4 SE 1/4 of Section 9 Township 20S Range 37E N.M.P.M.

b. Tract No. _____ of Map No. _____ of the _____

c. Lot No. _____ of Block No. _____ of the _____
Subdivision, recorded in _____ County.

d. X= _____ feet, Y= _____ feet, N.M. Coordinate System _____ Zone in
the _____ Grant.

(B) Drilling Contractor Gene Fades License No. WD-982

Address 1335 Katy Lane, Hobbs, N.M. 88240

Drilling Began 11-19-90 Completed 11-19-90 Type tools Rotary Size of hole 8 in.

Elevation of land surface or _____ at well is _____ ft. Total depth of well 46 ft.

Completed well is ☒ shallow ☐ artesian. Depth to water upon completion of well 30 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
30	46	16	Sot water sand	35

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
5 3/4	160psi				46		26	46

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor _____

Address _____

Plugging Method _____

Date Well Plugged _____

Plugging approved by: _____

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received June 20, 1991

Quad _____ FWL _____ FSL _____

File No. L-10,150 Use STOCK Location No. 20.37.9.41411

Sec 9 SE 1/4 NW 1/4 SE 1/4 20.37.9.41411

Section 6. LOG OF HOLE

[illegible]

Section 7. REMARKS AND ADDITIONAL INFORMATION

This well record is an excerpt from Oil Conservation Commission files at Hobbs, N.M.

Location: 20.37.10.11000

Elevation: 3544' DF_{OK}

Owner: Texaco Inc.

E. H. B. Phillips #1

Record of Casing: 9 5/8" - 1330'

660' FNL - 660' FWL

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. All questions, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

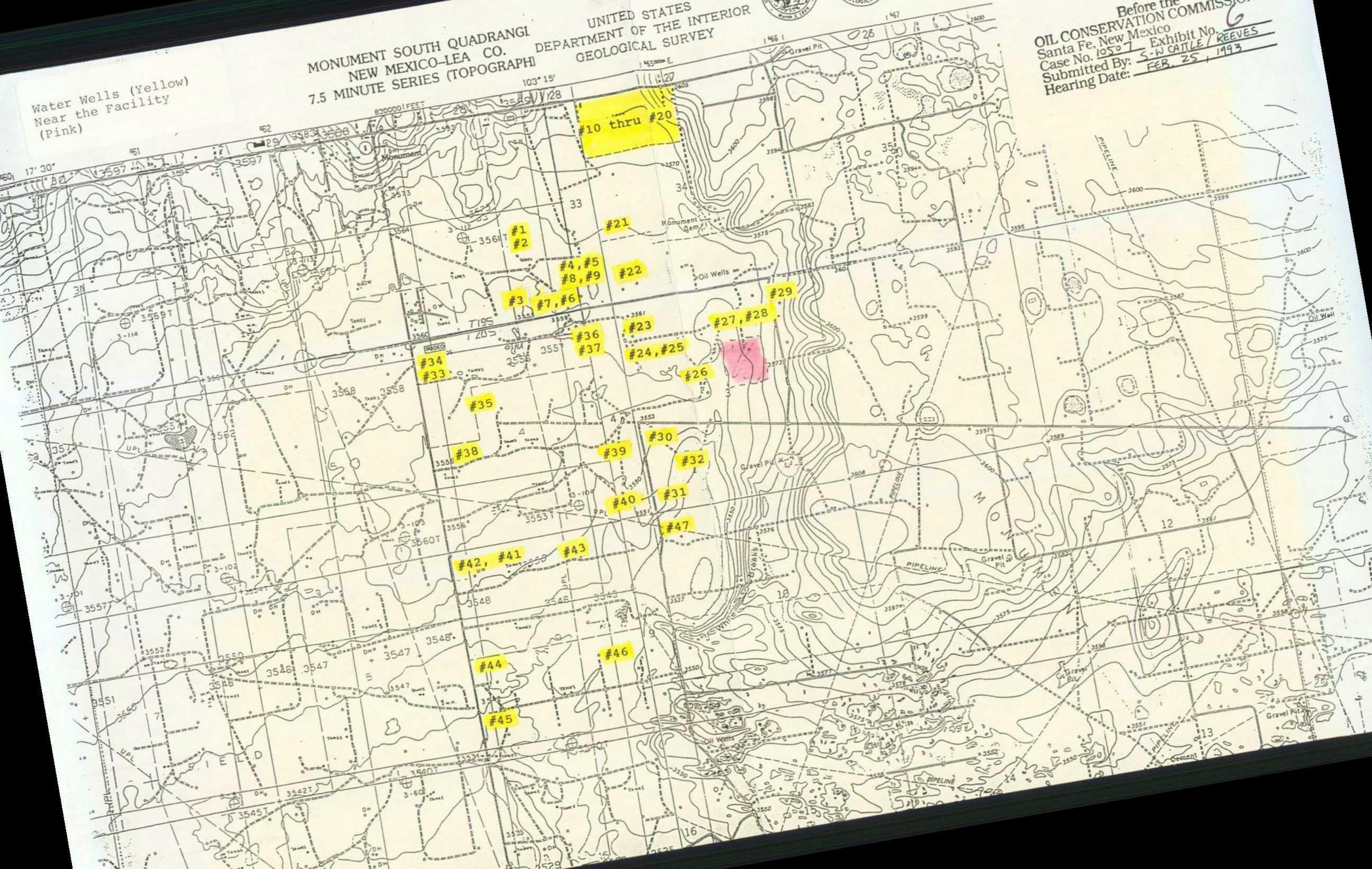
Water Wells (Yellow)
Near the Facility
(Pink)

MONUMENT SOUTH QUADRANGI
NEW MEXICO-LEA CO.
7.5 MINUTE SERIES (TOPOGRAPH)

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 6
Submitted By: S-W CATTLE / REEVES
Hearing Date: FEB. 25, 1993



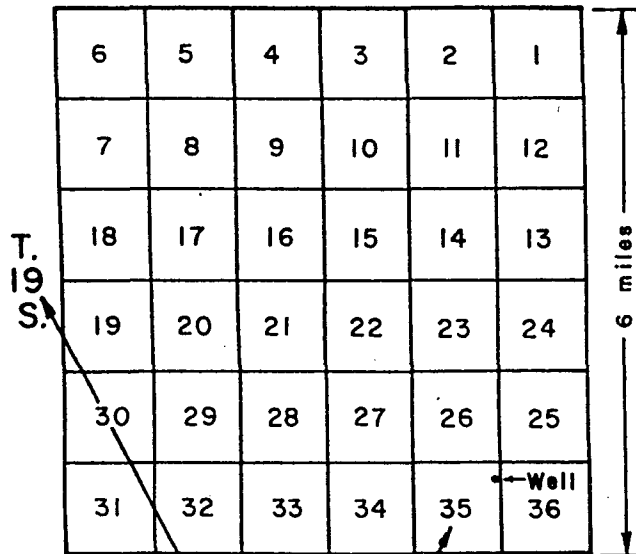
**Water Wells Near the Facility
with Depth to Water Level in Feet**

Township 19 South, Range 37 East:

#1	Sec 33.4132	Water Level 39'
#2	Sec 33.41341	Water Level 35'
#3	Sec 33.434	Water Level 29'
#4	Sec 33.442122	Water Level 23'
#5	Sec 33.442142	Water Level 31'
#6	Sec 33.44322	Water Level 42'
#7	Sec 33.44323	Water Level 31'
#8	Sec 33.44441	Water Level 42'
#9	Sec 33.444411	Water Level 31'
#10	Sec 34.111114	Water Level 22'
#11	Sec 34.11140	Water Level 30'
#12	Sec 34.11223	Water Level 35'
#13	Sec 34.11233	Water Level 24'
#14	Sec 34.11233	Water Level 20'
#15	Sec 34.112333	Water Level 24'
#16	Sec 34.112334	Water Level 23'
#17	Sec 34.1124	Water Level 36'
#18	Sec 34.11243	Water Level 35'
#19	Sec 34.11323	Water Level 24'
#20	Sec 34.12133	Water Level 36'
#21	Sec 34.31313	Water Level 25'
#22	Sec 34.3441	Dry

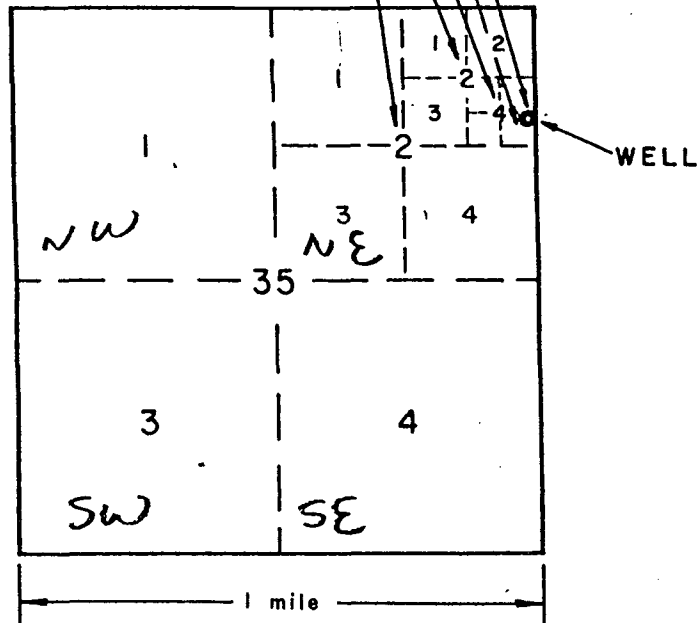
Sections within a township

R.14 E.



R.14 E.

Well 19.14.35.22442



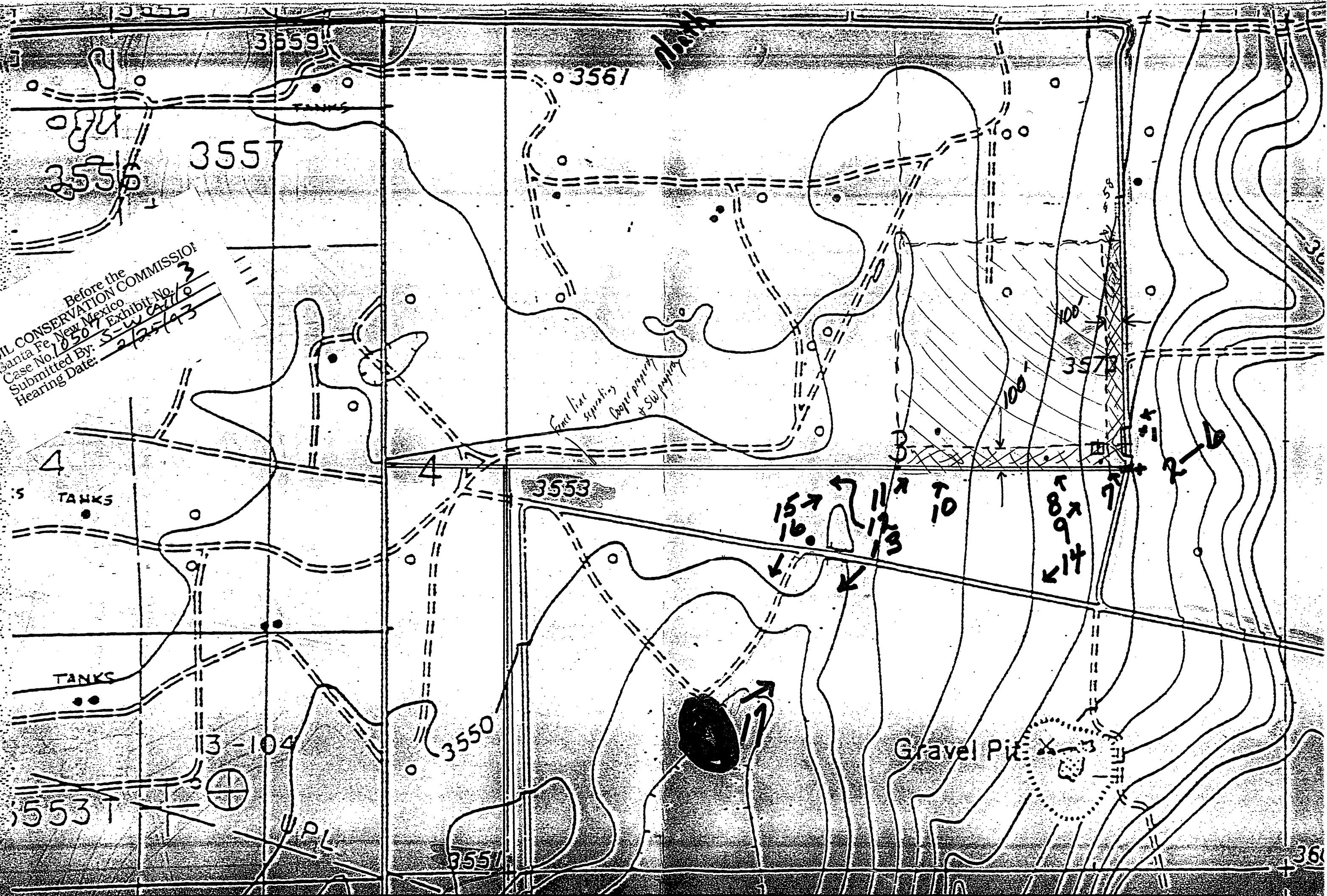
Tracts within a section

Do by 1st 3rd 14th

Township 20 South, Range 37 East:

#23	Sec 3.11100	Water Level 37'
#24	Sec 3.1130	Water Level 55'
#25	Sec 3.13100	Water Level 37'
#26	Sec 3.14000	Water Level 40'
#27	Sec 3.21000	Water Level 540'
#28	Sec 3.212434	Water Level 541'
#29	Sec 3.221344	Water Level 541'
#30	Sec 3.31100	Water Level Unknown
#31	Sec 3.33300	Water Level 28'
#32	Sec 3.34131	Water Level 15'
#33	Sec 4.111311	Water Level 30'
#34	Sec 4.111312	Water Level 29'
#35	Sec 4.14000	Water Level 70'
#36	Sec 4.22100	Water Level 37'
#37	Sec 4.221321	Water Level 31'
#38	Sec 4.312434	Water Level 29'
#39	Sec 4.42000	Water Level 35'
#40	Sec 4.44411	Water Level 20'
#41	Sec 9.112114	Water Level 34'
#42	Sec 9.112122	Water Level 29'
#43	Sec 9.21000	Water Level Unknown
#44	Sec 9.31113	Water Level 25'
#45	Sec 9.33122	Water Level 13'
#46	Sec 9.41411	Water Level 30'
#47	Sec 10.11000	Water Level Unknown

OIL CONSERVATION COMMISSION
Before the
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 3
Submitted By: S-W Oil Co.
Hearing Date: 2/25/43

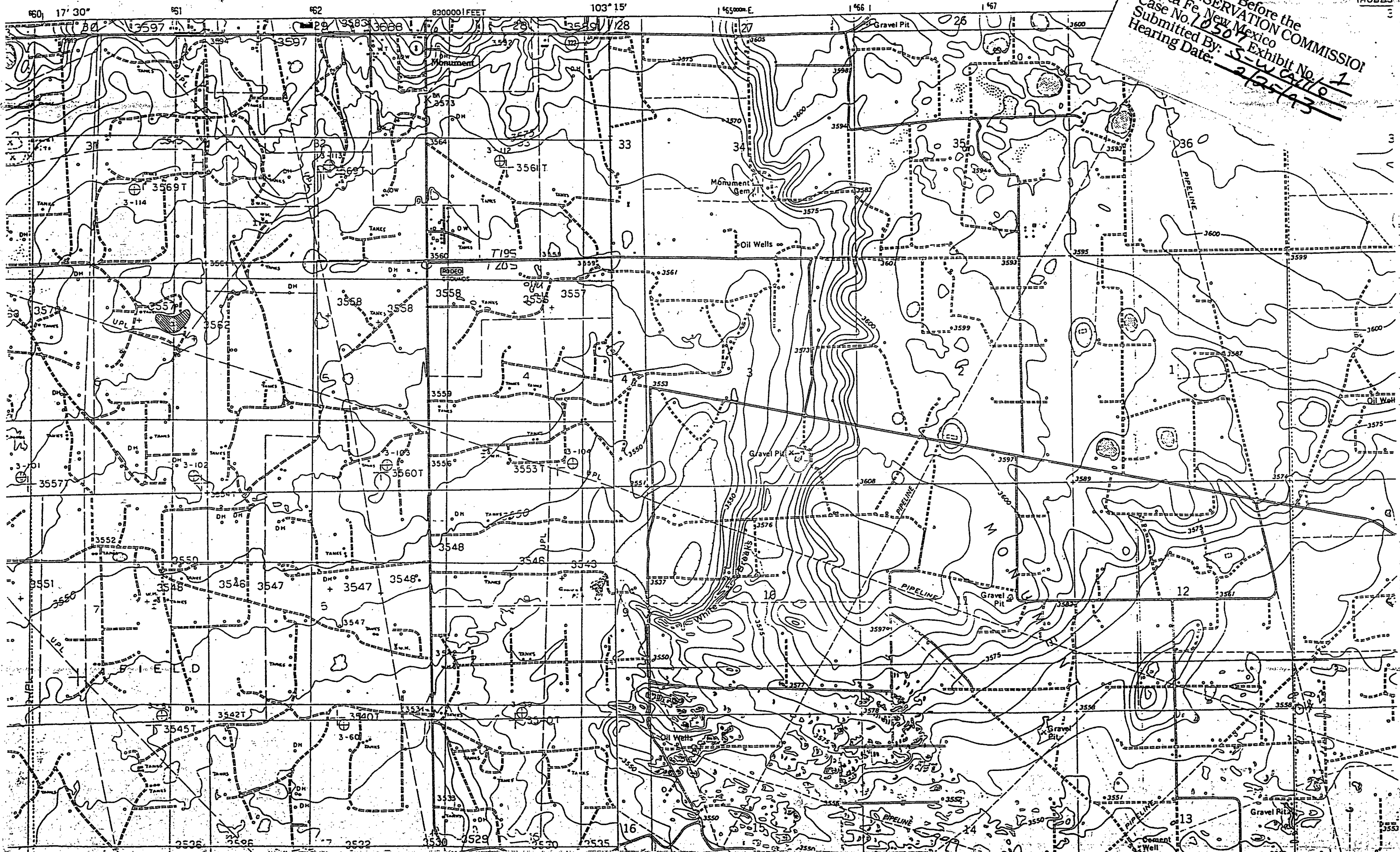


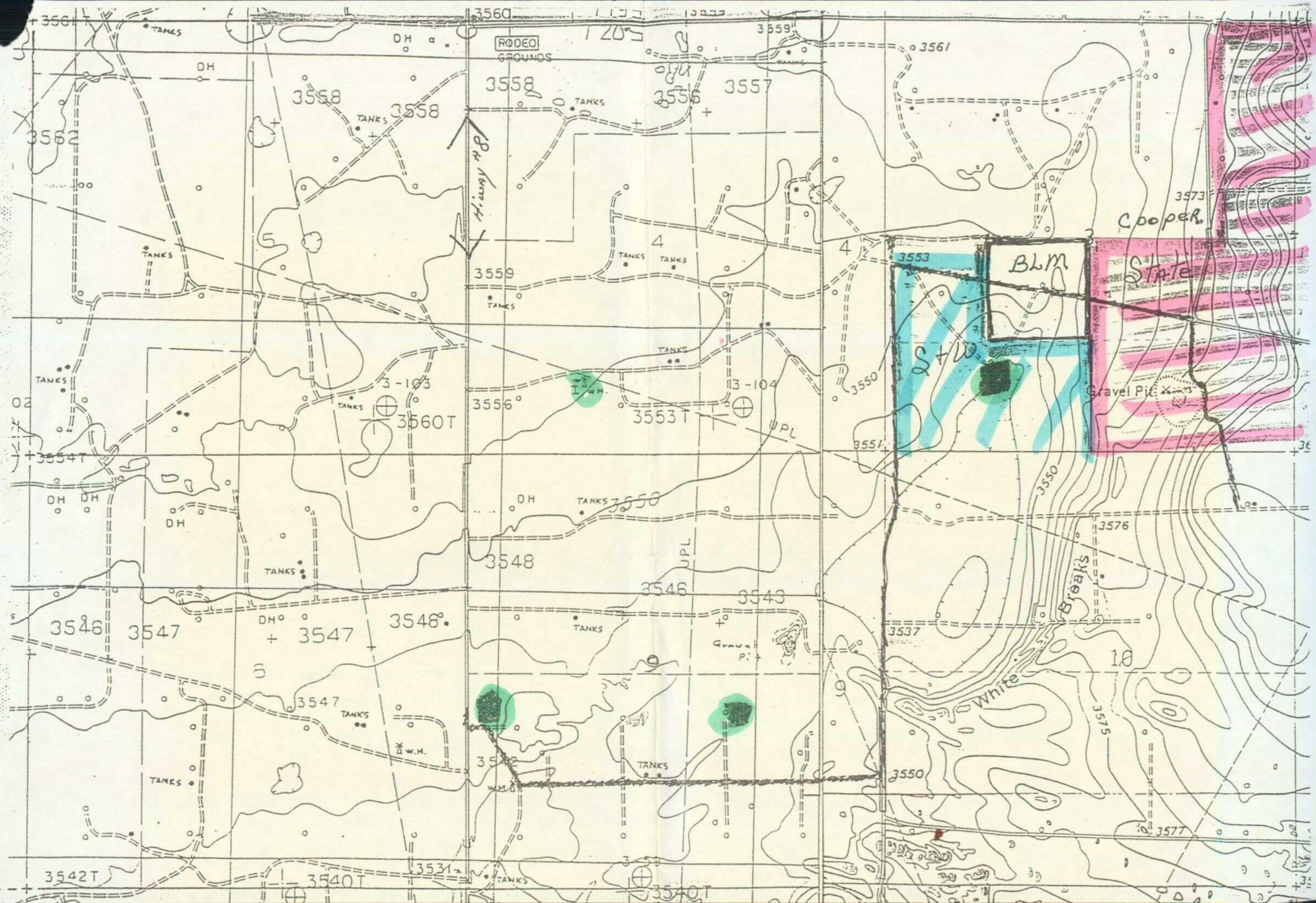
UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



53
(HOB)


OIL CONSERVATION COMMISSION
Before the
Santa Fe, New Mexico
Case No. 10307 Exhibit No. 1
Submitted By: S-LW C-110
Hearing Date: 2/25/93





BEFORE EXAMINER STOGNER
 Oil Conservation Division
 Exhibit No. 2
 Case No. _____

 Active Oil Field Roads

 County Road

 Elevations

 State Land

 Fee Land

 Water Wells

Well #1 -Located NW $\frac{1}{4}$, SE $\frac{1}{4}$, Sec. 9

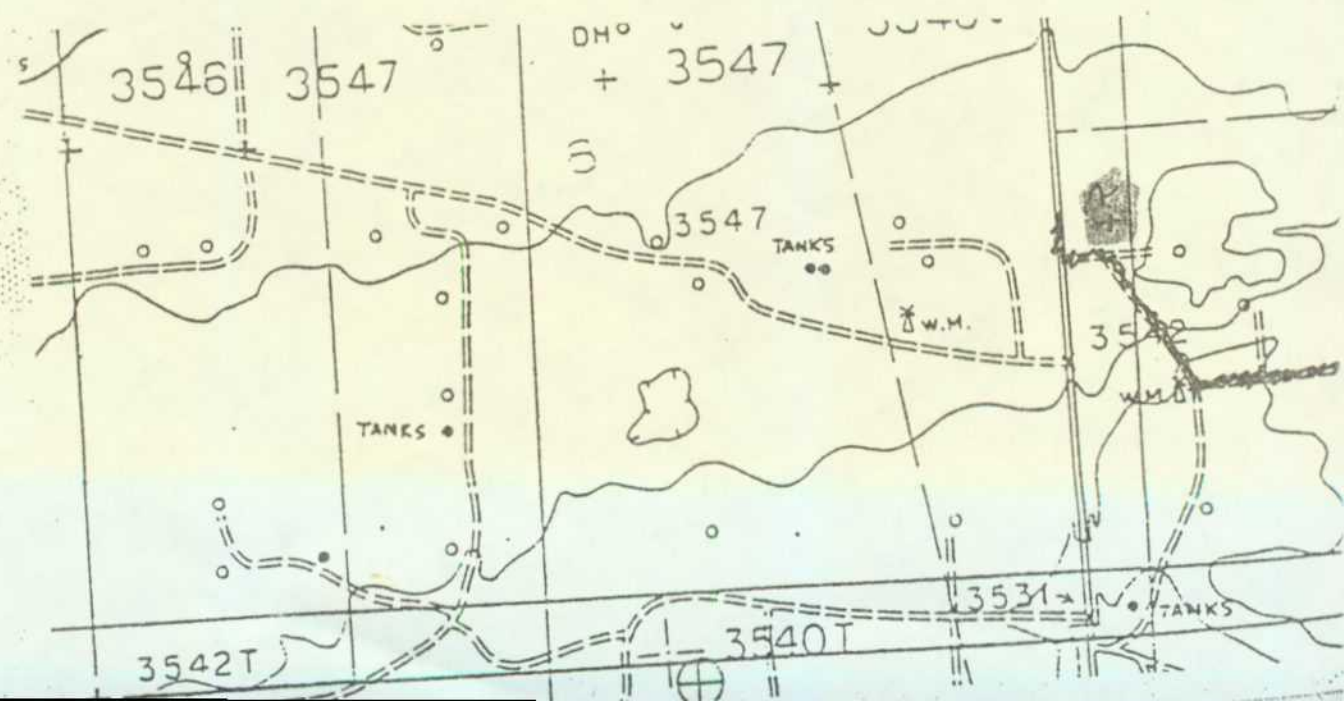
45' with 22' of water

Well #2 -Located NW $\frac{1}{4}$, SW $\frac{1}{4}$, Sec. 9

50' with 25' of water

Well #3 (Windmill) Located SW $\frac{1}{4}$, Sec. 9

31' with 16' of water



RECORD THE
DATE OF THE
REVISIONS
10507/CLNAB
5
NEW MEXICO OIL CONSERVATION DIVISION
GENERAL LANDFARM GUIDELINES
FOR COMMERCIAL LANDFARMS
2/25/93
(December 1992)

LANDFARM OPERATION

1. Disposal will only occur when an attendant is on duty. The facility will be secured when no attendant is present.
2. The facility will be fenced and have a sign at the entrance. The sign will be legible from at least fifty (50) feet and contain the following information: a) name of the facility, b) location by section, township and range, and c) emergency phone number.
3. An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.
4. All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
5. Soils will be spread on the surface in six inch lifts or less.
6. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
7. Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
8. Only oilfield wastes which are exempt from the RCRA Subtitle C regulations or non-hazardous by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt or are non-hazardous by characteristic testing will only be accepted on a case-by-case basis and with prior OCD approval. Comprehensive records of all laboratory analyses and sample locations will be maintained by the operator.
9. Moisture will be added as necessary to enhance bioremediation and to control blowing dust. There will be no ponding, pooling or run-off of water allowed. Any ponding of precipitation will be removed within seventy-two (72) hours of discovery.

10. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers will only be permitted after prior approval from the OCD. Request for application of microbes must include the location of the area designated for the bio-remediation program, composition of additives, and the method, amount and frequency of application.
11. No free liquids or soils with free liquids will be accepted at the facility.
12. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) date received, 3) quantity, 4) Exempt or non-exempt status and analysis for hazardous constituents if required, 5) transporter, and 6) exact cell location and any addition of microbes, moisture, fertilizers, etc.

TREATMENT ZONE MONITORING

1. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample will be analyzed for total petroleum hydrocarbons (TPH), general chemistry, volatile aromatic organics (BTEX), and heavy metals using approved EPA methods.
2. A treatment zone not to exceed three (3) feet beneath the land farm will be monitored. A minimum of one random soil sample will be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two to three (2-3) feet below the native ground surface.
3. The soil samples will be analyzed using approved EPA methods for TPH and BTEX quarterly, and for general chemistry and heavy metals annually.
4. After obtaining the soil samples the boreholes will be filled with an impermeable material such as bentonite cement.

REPORTING

1. Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe Office within thirty (30) days of receipt from the laboratory.
2. The OCD will be notified of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

BOND

Pursuant to OCD Rule 711 a surety or cash bond in the amount of \$25,000, in a form approved by the Division, is required prior to commencing construction of the commercial surface disposal facility.

CLOSURE

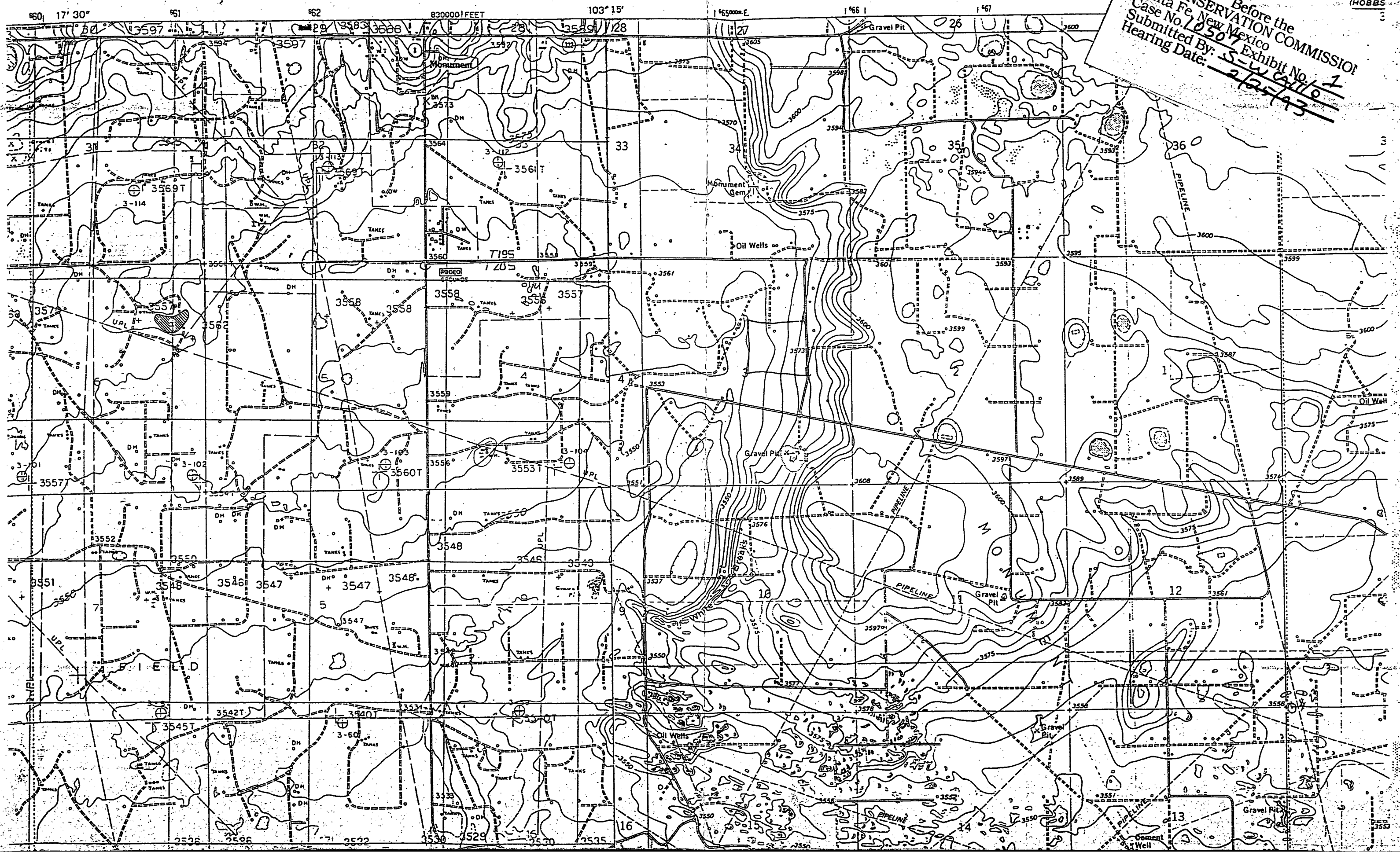
The operator will notify the Division of cessation of operations. Upon cessation of disposal operations for six (6) consecutive months, the operator will complete cleanup of constructed facilities and restoration of the facility site within the following six (6) months, unless an extension of time is granted by the Director. When the facility ceases operations When the facility is to be closed no new material will be accepted. Existing soils will be remediated until they meet the OCD standards in effect at the time of closure. The area will then be reseeded with natural grasses and allowed to return to its natural state. Closure will be pursuant to all OCD requirements in effect at the time of closure.

MONUMENT SOUTH QUADRANGI
NEW MEXICO-LEA CO.
7.5 MINUTE SERIES (TOPOGRAPHI

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507
Submitted By: S. W. Cull
Hearing Date: 2/25/43
Exhibit No. 1



State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

10507 (DENIED)

C+C LANDFARM, INC

2/25/93

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

(Refer to OCD Guidelines for assistance in completing the application.)

- I. Type: ☐ Produced Water ☐ Drilling Muds ☐ Treating Fluids
☒ Solids ☐ Other _____
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55 Monument, NM 88265
CONTACT PERSON: Jimmie T. Cooper PHONE: 505-397-2045
- III. LOCATION: SW /4 NE /4 Section 3 Township 20 Range 37 E
Submit large scale topographic map showing exact location.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? ☐ Yes ☒ No
- V. Attach the name and address of the landowner of the disposal facility site and landowners of record within one-h of the site.
- VI. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the faci
- VII. Attach detailed engineering designs with diagrams prepared in accordance with Division guidelines construction/installation of the following: pits or ponds; leak-detection systems; aerations sytems; en evaporation (spray) systems; waste treating systems and security systems.
- VIII. Attach a contingency plan for reporting and clean-up of spills or releases.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a closure plan.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impa water.
- XII. Attach proof that the notice requirements of OCD Rule 711 have been met. (Commercial facilities only.)
- XIII. Attach a contingency plan in the event of a release of H₂S.
- XIV. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations orders.
- XV. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay

Title:

Agent/Consultant

Signature: Eddie W. Seay

Date:

March 1, 1993

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

- I. Type: Solids - Oil or Salt water contaminated soils from production facilities only.
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55 Monument, NM 88265
CONTACT PERSON: Jimmie T. Cooper
PHONE: 505-397-2045
- III. LOCATION: SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37 East, Lea Co., NM.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? No, this is a new facility.
- V. LANDOWNER OF FACILITY SITE
Jimmie T. Cooper
P.O. Box 55
Monument, NM 88265
- LANDOWNERS OF RECORD WITHIN 1/2 MILE
- State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504
- S & W Cattle Co.
8900 South County Rd. 58
Monument, NM 88265
- J.R. Williams, et al
P.O. Box 215
Monument, NM 88265
- A.C. Doyall
P.O. Box 188
Monument, NM 88265
- VI. DIAGRAM (attached)
- (A) Excavate area as needed down to top of redbed approximately 10 to 12 feet. Use overburden to build burms around site to prevent and restrict rain run off and drainage to facility.
- (B) Fence around all sides, with chain link fence adjacent to County Road 58.
- (C) Gate with cattle guard at entrance. Open during daylight hours only.
- (D) 5 monitor wells on North, South, East, and West sides.
- (E) Signs posted with restrictions and permit no.

(F) Any other improvement as needed or required by
OCD.

VII. DRAWING OF MONITOR WELL (attached)

Excavate land area down to redbed, dispose of contaminated soil in 6 in. lifts and till or plow every 30 to 60 days as needed to ensure proper aeration so soil can be cleaned up by natural remediation according to government standards. Have soil tested for TPH and BTEX before adding new lift as required.

VII. CONTINGENCY PLAN (NA)

There will be no liquids at facility. Any soil accidentally spilled at facility will be picked up with front end loader and deposited within landfill. No material will be accepted without documentation.

IX. ROUTINE INSPECTION AND MAINTENANCE PLAN

- (1) Weekly inspection of monitor wells.
- (2) Road area around facility will be graded and kept free of oily dirt.
- (3) All loads will be documented and logged.
- (4) No liquids accepted.
- (5) No tank bottoms accepted.
- (6) Area will be posted with proper signs.
- (7) No dumping will be allowed unless facility is open.
- (8) May require letter from company showing waste has not been mixed with non-exempt waste.
- (9) All area properly fenced with locked gates.
- (10) Each lift will be tested for BTEX Method 602 and TPH Method 8015 EPA test requirements before adding new lift.

X. CLOSURE PLAN

All overburden will be removed down to the redbed, averaging from 12 ft. on the east side, to 16 ft. on the west side.

Disposal of solids will start at redbed, when area has been filled and tested to within 1 ft. of surface elevation, area will be backfilled with top soil, mound over and compacted. The mound should prevent rain or water from standing or leaching into backfill.

All fences will be left in tact and monitor wells left in place for future monitoring.

Also, any additional rule or regulation at time of closure will be adhered to.

- XI. Geographically, the site is situated near the western boundary of the southern extension of the High Plains in Southeastern New Mexico. The site in question is a 40 acre tract located in Unit G, Section 3, Township 20, Range 37 E, Lea Co., NM.

The site which is bordered by County road 58 on the east, has a gradual surface slope to the west. To the SE of this site in Unit Lettter O is a large pit with the redbed exposed. Redbed is a layer of relatively impermeable clays, red to reddish brown in color, underlying the fresh water aquifer in SE New Mexico ranging in thickness up to 1200 ft.

C & C Landfarm Inc. is located on or near the redbed layer. A series of test wells were drilled to define the redbed and check for fresh water.

TEST WELL LOGS

- #1 Located 100 yds. N of NW corner
0-1 ft. Top Soil
1-18 ft. Caliche, Rock 17'
18-20 ft. Redbed
All formations dry.
- #2 Located 125 ft. N of the south line on the extreme west edge.
0-1 1/2 ft. Top Soil
1 1/2-16 ft. Caliche, Rock 12'
16-18 ft. Redbed
All formations dry.
- #3 Located 100 yds. E of the west line on the south side.
0-1 ft. Top Soil
1-15 ft. Caliche, Rock 10'
15-17 ft. Redbed
All formations dry.
- #4 Located 50 yds. W of the east line on the south border.
0-1 ft. Top Soil
1-13 ft. Caliche, Rock 12'
13-16 ft. Redbed
All formations dry.
- #5 Located 150 yds. W of east line on the north side.
0-1 ft. Top Soil 13'

1-14 ft. Caliche, Rock
14-17 ft. Redbed
All formations dry.

- * An area in the middle of the east edge of the property, was excavated with a backhoe. Rock and caliche at 0-12 ft. Redbed was encountered at 12 ft.

The wells were drilled with rotary rig, no water was encountered, only caliche, rock, and sand down to redbed. The redbeds came in at 12 ft. on the east side, down to 17 ft. on the west side. The five wells drilled were completed into the redbed and cased with 3 in. PVC pipe with 5 ft. of screen on bottom with the top 2 ft. cemented and capped. Wells to be secured with locks and used as monitor wells.

Researched State Engineers records and U.S.G.S. file, no fresh water was recorded or found within area of review. A physical inspection was made and a windmill was found approximately 1 mile SW of the site, a sample was taken and analysis recorded for future use.

We feel this is one of the better sites for deposit of contaminated soil due to the thickness of redbeds, little or no fresh water in the area, a monitor system is in place for control of system. This system is in the middle of the oil and gas production and will serve a valuable environmental need, both regulatory and industrial.

- XII. PROOF OF OCD RULE 711 (attached)
- XIII. CONTINGENCY PLAN FOR RELEASE OF H₂S (NA)

Open pit system should not have H₂S. If encountered, OCD Rule 118 will be adhered to.
- XIV. All State of New Mexico, Oil Conservation rules will be enforced as they pertain to this system.

C & C LANDFARM INC.

Additional information to Application for Surface Waste Disposal.

- I. The thickness of the rebeds varied from area to area in Section 3. The information was taken from logs of producing oil wells in the area and lithology reports.

Unit C	Top 20 ft.	Base 960 ft.
F	30 ft.	562 ft.
B	14 ft.	880 ft.
H	15 ft.	1350 ft.
M	30 ft.	1270 ft.
L	40 ft.	1050 ft.

with the average thickness being 987 ft.

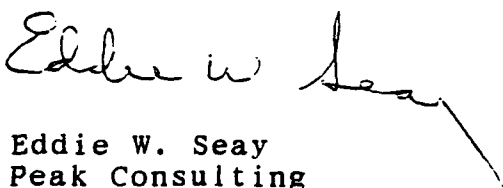
- II. Groundwater in the area; Figure I is a copy of the State Engineer's water analysis and locations for this area, none were listed in Sect. 3. The windmill SSW of our proposed site appears to be located in Unit M of Sect. 3 approximately 3/4 mile from site; Figure II is a copy of analysis from S & W windmill. Figure III indicates water wells in the general area showing top and bottom of water formation and contour line indicating direction of flow, which is SE. Figure IV is a contour map of top of rebed, with slopes to the SSE. Figure V is a contour map of the surface for the surrounding area, the direction of slope is to the west.

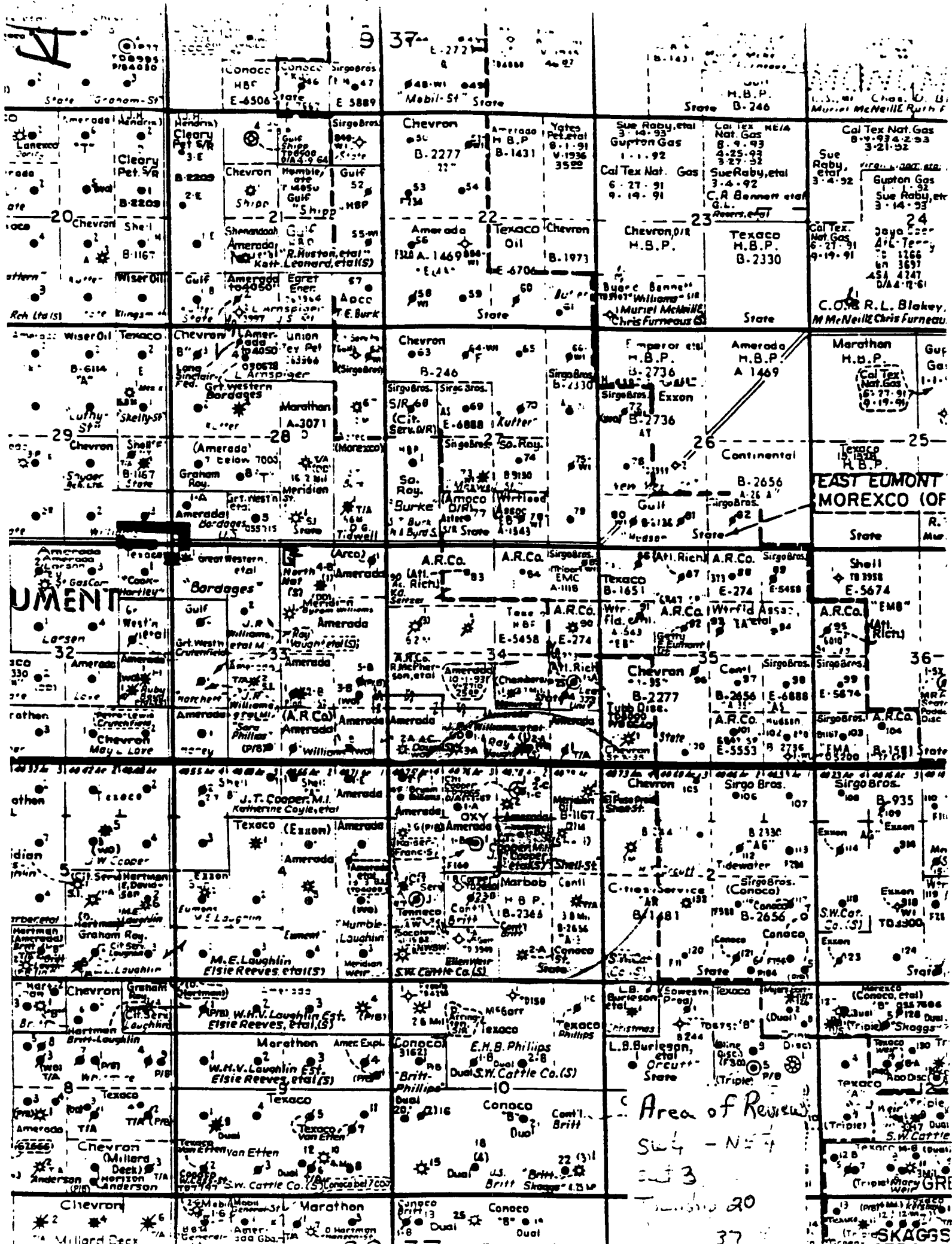
The contour maps provided are information from the State Bureau of Mines, which shows any movement at our site would run SE along the rebed surface and west along the top of ground.

If the State feels it is necessary, additional monitor wells can be installed or a rebed barrier constructed on the SW portion of our site to prevent any contaminate from moving.

- III. Also provided are the mail receipts from registered letters.

Any additional information needed, please call (505)392-2236.


Eddie W. Seay
Peak Consulting



	LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	BASIN FILE
3	20S 36E 09 13440	10/12/84	434	2350	63F	TOG	L
5	20S 36E 10 32114	08/28/72	79	520		GAL	L
6	20S 36E 10 32114	11/01/76	66	889	66F	GAL	L
7	20S 36E 10 32114	10/19/79	68	880	66F	GAL	L
8	20S 36E 10 32114	10/12/84	92	980	64F	GAL	L
10	20S 36E 11 42243	08/28/72	1000	1450		GAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	GAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	GAL	L
13	20S 36E 11 42243	10/12/84	840	4330	64F	GAL	L
15	20S 36E 15 242421	08/28/72	720	1800		GAL	L
16	20S 36E 15 242421	11/01/76	518	3223		GAL	L
17	20S 36E 15 242421	10/12/84	882	3630	63F	GAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	GAL	L
20	20S 36E 15 24342	03/30/54	1080	6780		TOG	L
21	20S 36E 15 24342	09/09/58	1240	7500		TOG	L
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
26	20S 36E 26 24344	11/08/79	150	1790		TOG	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	TOG	L
29	20S 36E 26 24443	11/08/79	182	1895		TOG	L
31	20S 36E 35 24444	11/08/79	118	1541		TOG	L
33	20S 37E 04 11114	04/02/54	450	2180		GAL	L
34	20S 37E 04 11114	04/22/55	425	2090		GAL	L
35	20S 37E 04 11114	09/09/58	325	1670		GAL	L
37	20S 37E 04 221321	04/22/55	51	758		GAL	L
38	20S 37E 04 221321	09/09/58	47	708		GAL	L
39	20S 37E 04 221321	07/14/77	106	1070		GAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	GAL	L
41	20S 37E 04 221321	2/06/85	81	964		GAL	L
43	20S 37E 05 222144	11/29/79	258	1611		TOG	L
44	20S 37E 05 222144	9/26/84	314	1729		TOG	L
46	20S 37E 07 24331	11/09/79	1268	4232		TOG	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	TOG	L
49	20S 37E 08 244124	11/29/79	868	3734	57F	TOG	L 07620 ES
51	20S 37E 08 423223	10/25/79	520	2396	66F	TOG	L
52	20S 37E 08 423223	9/26/84	886	3806		TOG	L

WATER ANALYSIS REPORT

Company : S & W CATTLE CO
 Address : HOBBS, NEW MEXICO
 Lease : SECT 3 T20 R37
 Well : UNIT M
 Sample Pt. : WINDMILL

Date : 10/29/91
 Date Sampled : 10/28/91
 Analysis No. : 876

ANALYSIS		mg/L		* meq/L
-----		----		-----
1. pH	7.1			
2. H2S	NEGATIVE			
3. Specific Gravity	1.000			
4. Total Dissolved Solids		2245.2		
5. Suspended Solids				
6. Dissolved Oxygen				
7. Dissolved CO2				
8. Oil In Water				
9. Phenolphthalein Alkalinity (CaCO3)				
10. Methyl Orange Alkalinity (CaCO3)		291.0		
11. Bicarbonate	HCO3	355.0	HCO3	5.8
12. Chloride	Cl	599.1	Cl	16.9
13. Sulfate	SO4	575.0	SO4	12.0
14. Calcium	Ca	153.5	Ca	7.7
15. Magnesium	Mg	66.1	Mg	5.4
16. Sodium (calculated)	Na	496.4	Na	21.6
17. Iron	Fe	0.0		
18. Barium	Ba	0.0		
19. Strontium	Sr	0.0		
20. Total Hardness (CaCO3)		655.6		

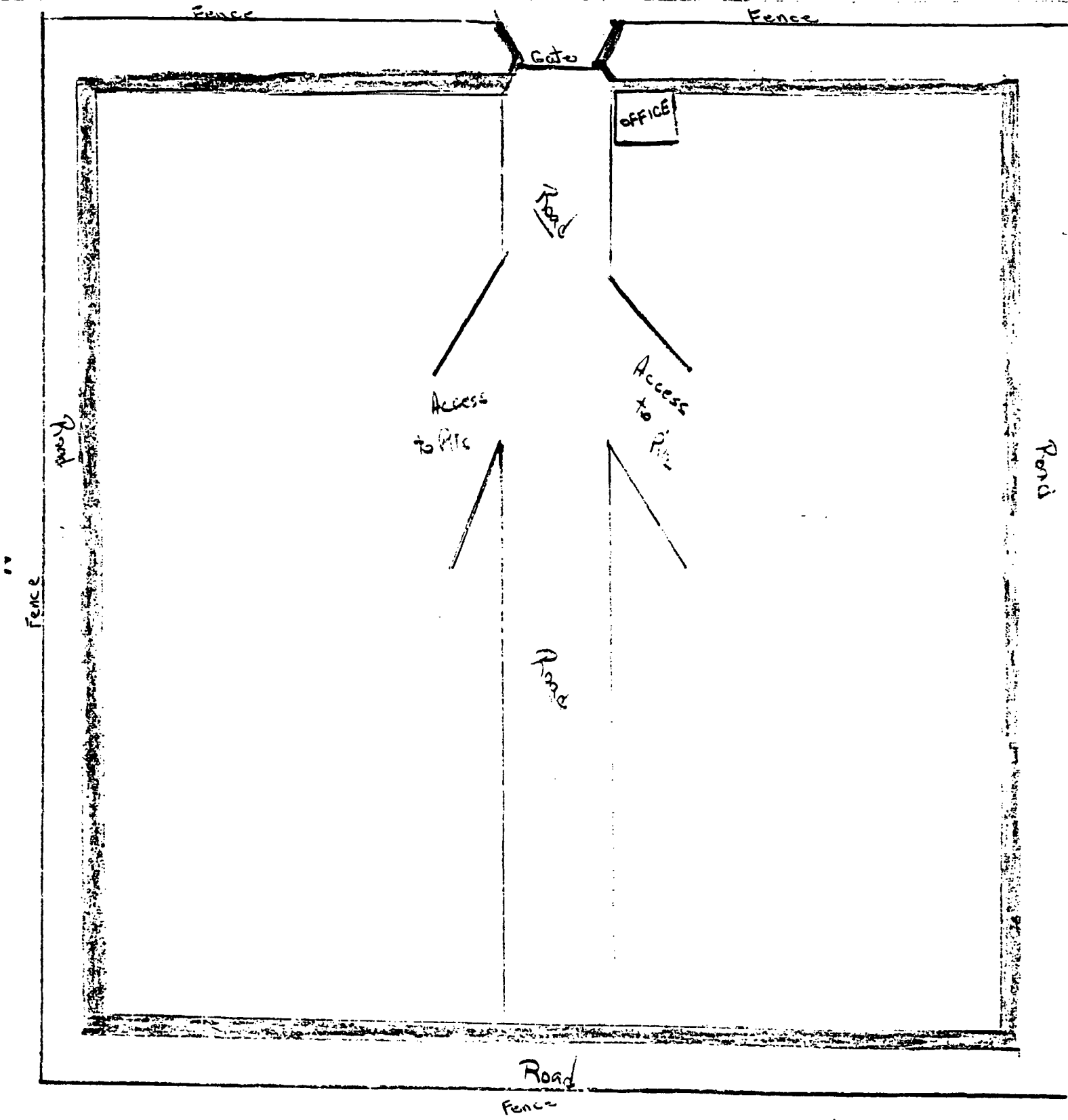
PROBABLE MINERAL COMPOSITION

*milli equivalents per Liter		Compound	Equiv wt X meq/L	= mg,
-----		-----	-----	-----
8 *Ca <----- *HCO3	6	Ca (HCO3) 2	81.0	5.8 472
----- /----->	-----	CaSO4	68.1	1.8 125
5 *Mg -----> *SO4	12	CaCl2	55.5	
----- <----- /	-----	Mg (HCO3) 2	73.2	
22 *Na -----> *Cl	17	MgSO4	60.2	5.4 325
-----	-----	MgCl2	47.6	
Saturation Values Dist. Water 20 C		NaHCO3	84.0	
CaCO3 13 mg/L		Na2SO4	71.0	4.7 335
CaSO4 * 2H2O 2090 mg/L		NaCl	58.4	16.9 988
BaSO4 2.4 mg/L				

REMARKS: EDDIE SEAY

E

County Road 58 "Billy Walker Road"



Water wells
Dyke
Inspection Area

LEASE

C+C Land farm Inc.

WELL No.

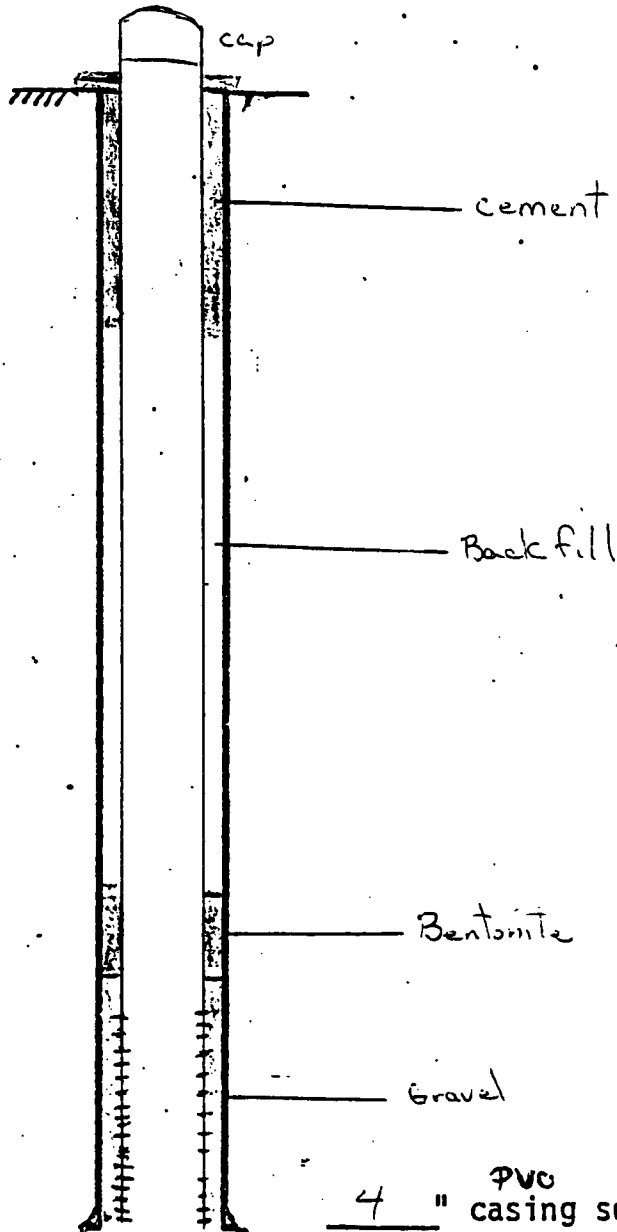
MW

LOCATION

W 1/4 G S-3 T20 R37 E

VII

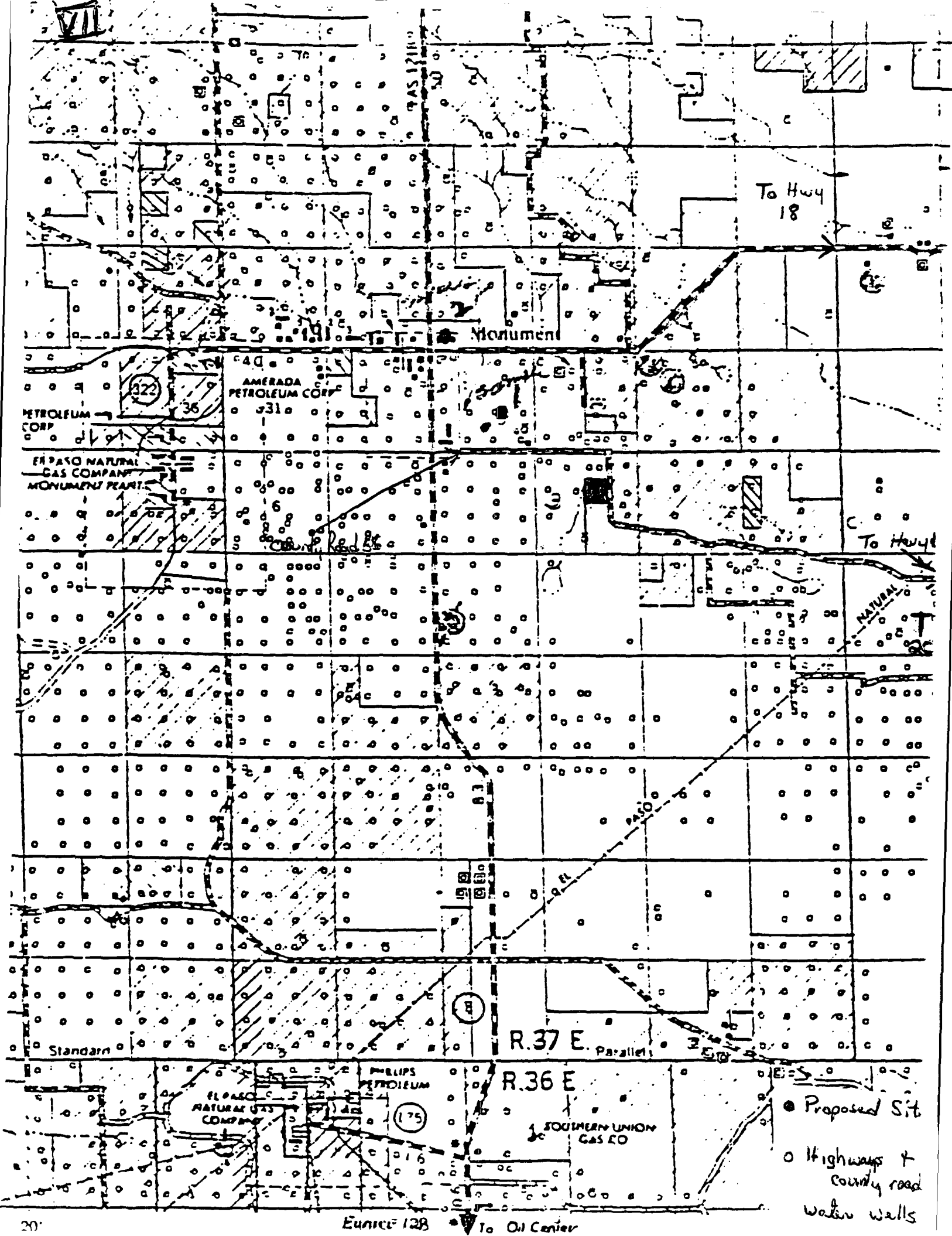
Test well - Monitor well

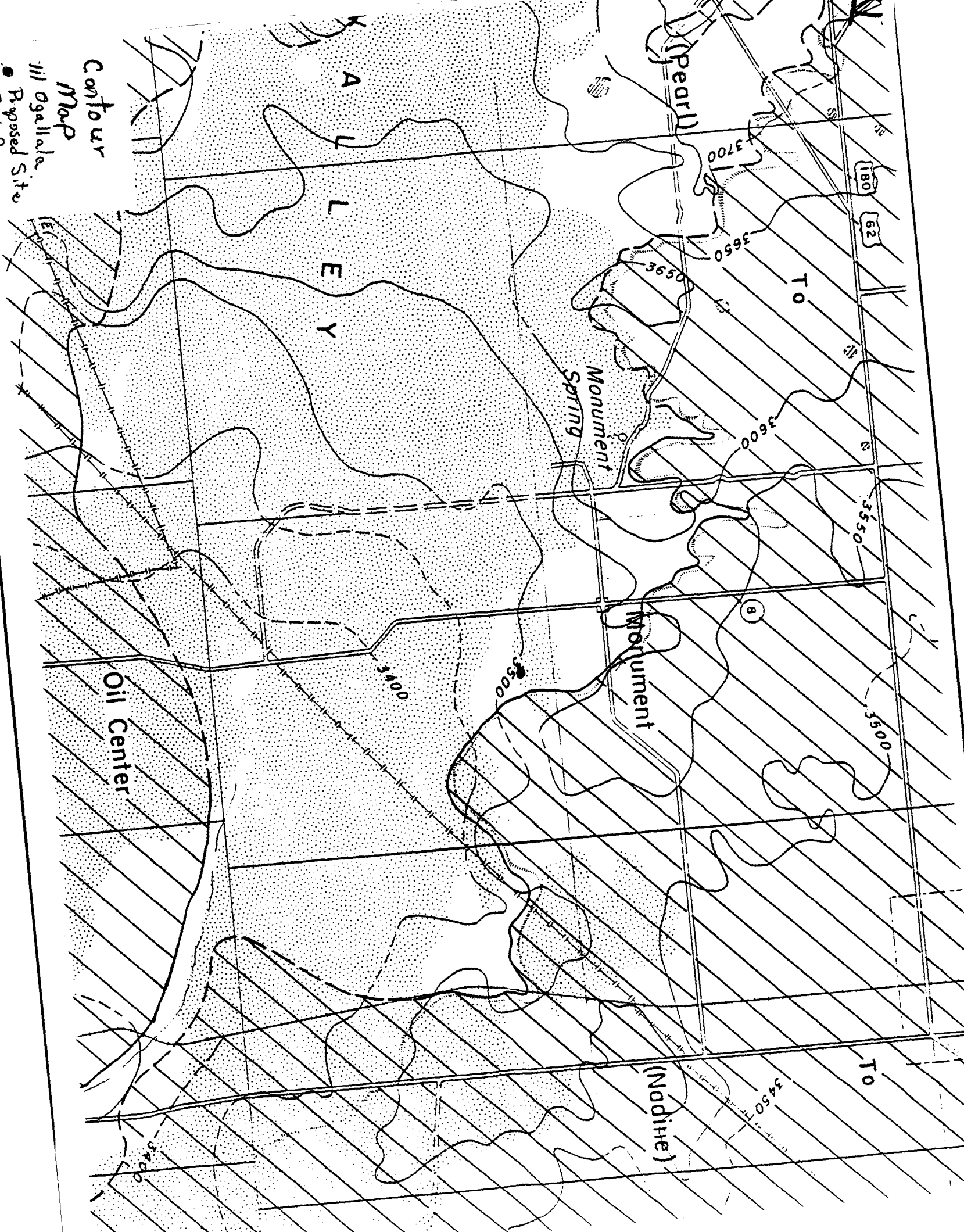


4" ^{PVC} casing set at Red bed

Hole size 6 ³/₄"

VII





Contour
Map
III Ogallala
Proposed Site

Oil Center

(Nadine)

Monument

Monument
Spring

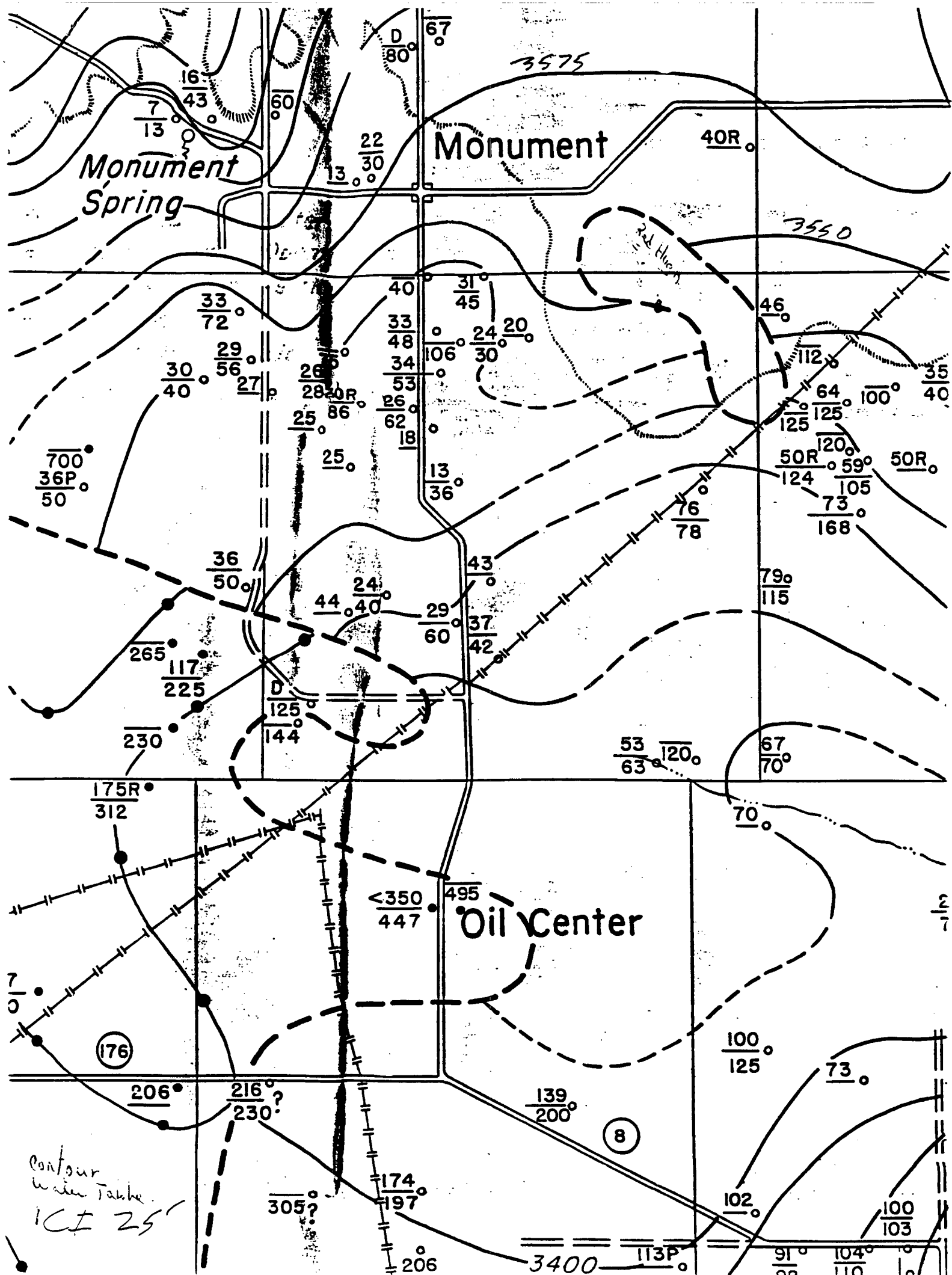
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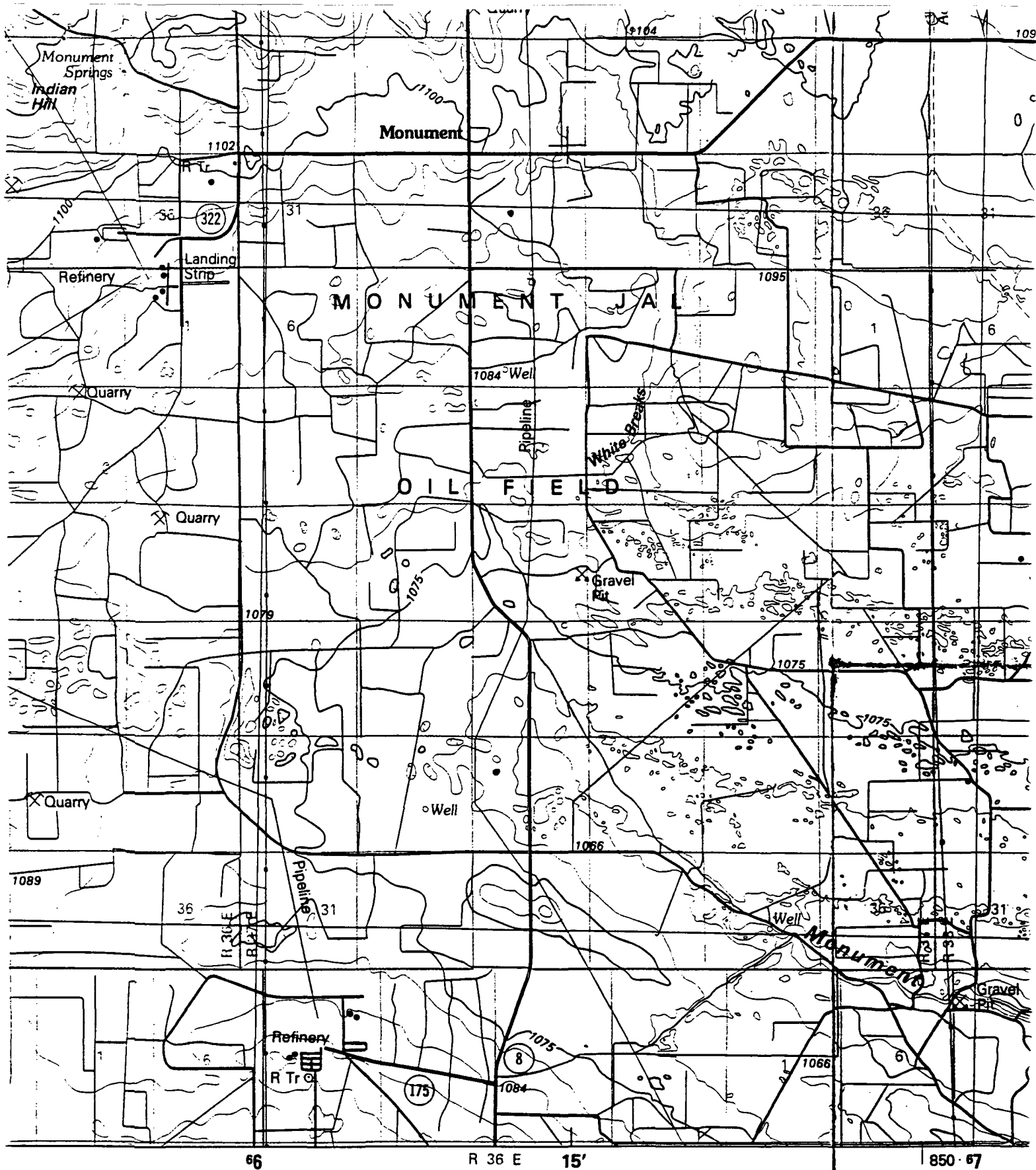
TO

TO

180 62

8





NEW MEXICO

CI 5 METERS

Surface Contour

Peren:

Intern:

Villag

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

Mr. A.C. Doyall
P.O. Box 188
Monument NM 88265

Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.



Eddie W. Seay
Peak Consulting Service

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

Mr. J.R. Williams, et al
P.O. Box 215
Monument NM 88265

Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.

Eddie W. Seay

Eddie W. Seay
Peak Consulting Service

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

S & W Cattle Co.
8900 South County Road 58
Monument NM 88265

Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.



Eddie W. Seay
Peak Consulting Service

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

Mr. Jimmie T. Cooper, Landowner
P.O. Box 55
Monument NM 88265

Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.


Eddie W. Seay
Peak Consulting Service

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

Commissioner of Public Lands
State of New Mexico
NM State Land Office
P.O. Box 1148
Santa Fe, NM 87504

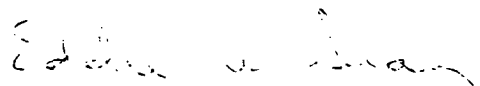
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If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.



Eddie W. Seay
Peak Consulting Service

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional services requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: S & W Cattle Co.
P.O. Box 1799
Hobbs, NM 88240

4. Article Number: P 661 750 229

Type of Service: ☐ Registered ☐ Insured ☐ Certified ☐ COD ☐ Return Receipt for Merchandise ☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

5. Signature - Addressee

6. Signature - Agent: J. Humels

7. Date of Delivery: 7-15-91

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional services requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. A.C. Doyal
P.O. Box 188
Monument, NM 88265

4. Article Number: P 661 750 230

Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Return Receipt for Merchandise ☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

5. Signature - Addressee

6. Signature - Agent: R. Lloyd

7. Date of Delivery: 10-7-91

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional services requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Jimmie T. Cooper
P.O. Box 55
Monument, NM 88265

4. Article Number: P 661 750 234

Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Return Receipt for Merchandise ☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

5. Signature - Addressee: Jimmie T. Cooper

6. Signature - Agent

7. Date of Delivery: 7-10-91

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional services requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Commissioner of Public Lands
State of New Mexico
NM State Land Office
P.O. Box 1148
Santa Fe, NM 87504

4. Article Number: P 661 750 231

Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Return Receipt for Merchandise ☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

5. Signature - Addressee: K. E. N. M. 1991

6. Signature - Agent: [Signature]

7. Date of Delivery: 1991

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Apollo Realty ATTN: J.R. Williams P.O. Box 75285 Albuquerque, NM 87194-0285		4. Article Number P 661 750 228	
5. Signature - Addressee <input checked="" type="checkbox"/>		Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature - Agent <input checked="" type="checkbox"/>		Always obtain signature of addressee or agent and DATE DELIVERED.	
7. Date of Delivery 10-15-91		8. Addressee's Address (ONLY if requested and fee paid)	

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 8
Submitted By: S-W Cattle
Hearing Date: 2/25/93

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY
(Refer to OCD Guidelines for assistance in completing the application.)

- I. Type: ☐ Produced Water ☐ Drilling Muds ☐ Treating Fluids
☒ Solids ☐ Other _____
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55 Monument, NM 88265
CONTACT PERSON: Jimmie T. Cooper PHONE: 505-397-2045
- III. LOCATION: SW /4 NE /4 Section 3 Township 20 Range 57 E
Submit large scale topographic map showing exact location.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? ☐ Yes ☒ No
- V. Attach the name and address of the landowner of the disposal facility site and landowners of record within one-half m of the site.
- VI. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VII. Attach detailed engineering designs with diagrams prepared in accordance with Division guidelines for : construction/installation of the following: pits or ponds; leak-detection systems; aerations systems; enhance evaporation (spray) systems; waste treating systems and security systems.
- VIII. Attach a contingency plan for reporting and clean-up of spills or releases.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a closure plan.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fre water.
- XII. Attach proof that the notice requirements of OCD Rule 711 have been met. (Commercial facilities only.)
- XIII. Attach a contingency plan in the event of a release of H₂S.
- XIV. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and orders.
- XV. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay Title: Agent/Consultant
Signature: Eddie W. Seay Date: October 4, 1991

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

- I. Type: Solids - Oil or Salt water contaminated soils from production facilities only.
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55 Monument, NM 88265
CONTACT PERSON: Jimmie T. Cooper
PHONE: 505-397-2045
- III. LOCATION: SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37 East, Lea Co., NM.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? No, this is a new facility.
- V. LANDOWNER OF FACILITY SITE
Jimmie T. Cooper
P.O. Box 55
Monument, NM 88265

LANDOWNERS OF RECORD WITHIN 1/2 MILE

State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504

S & W Cattle Co.
8900 South County Rd. 58
Monument, NM 88265

J.R. Williams, et al
P.O. Box 215
Monument, NM 88265

A.C. Doyall
P.O. Box 188
Monument, NM 88265

- VI. DIAGRAM (attached)
- (A) Excavate area as needed down to top of redbed approximately 10 to 12 feet. Use overburden to build burms around site to prevent and restrict rain run off and drainage to facility.
- (B) Fence around all sides, with chain link fence adjacent to County Road 58.
- (C) Gate with cattle guard at entrance. Open during daylight hours only.
- (D) 5 monitor wells on North, South, East, and West sides.
- (E) Signs posted with restrictions and permit no.

Also, any additional rule or regulation at time of closure will be adhered to.

- XI. Geographically, the site is situated near the western boundary of the southern extension of the High Plains in Southeastern New Mexico. The site in question is a 40 acre tract located in Unit G, Section 3, Township 20, Range 37 E, Lea Co., NM.

The site which is bordered by County road 58 on the east, has a gradual surface slope to the west. To the SE of this site in Unit Letter O is a large pit with the redbed exposed. Redbed is a layer of relatively impermeable clays, red to reddish brown in color, underlying the fresh water aquifer in SE New Mexico ranging in thickness up to 1200 ft.

C & C Landfarm Inc. is located on or near the redbed layer. A series of test wells were drilled to define the redbed and check for fresh water.

TEST WELL LOGS

- #1 Located 100 yds. N of NW corner
0-1 ft. Top Soil
1-18 ft. Caliche, Rock
18-20 ft. Redbed
All formations dry.
- #2 Located 125 ft. N of the south line on the extreme west edge.
0-1 1/2 ft. Top Soil
1 1/2-16 ft. Caliche, Rock
16-18 ft. Redbed
All formations dry.
- #3 Located 100 yds. E of the west line on the south side.
0-1 ft. Top Soil
1-15 ft. Caliche, Rock
15-17 ft. Redbed
All formations dry.
- #4 Located 50 yds. W of the east line on the south border.
0-1 ft. Top Soil
1-13 ft. Caliche, Rock
13-15 ft. Redbed
All formations dry.
- #5 Located 150 yds. W of east line on the north side.
0-1 ft. Top Soil

Also, any additional rule or regulation at time of closure will be adhered to.

- XI. Geographically, the site is situated near the western boundary of the southern extension of the High Plains in Southeastern New Mexico. The site in question is a 40 acre tract located in Unit C, Section 3, Township 20, Range 37 E, Lea Co., NM.

The site which is bordered by County road 58 on the east, has a gradual surface slope to the west. To the SE of this site in Unit Lettter O is a large pit with the redbed exposed. Redbed is a layer of relatively impermeable clays, red to reddish brown in color, underlying the fresh water aquifer in SE New Mexico ranging in thickness up to 1200 ft.

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1 1/2-16 ft. Caliche, Rock
16-18 ft. Redbed
All formations dry.
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0-1 ft. Top Soil
1-15 ft. Caliche, Rock
15-17 ft. Redbed
All formations dry.
- #4 Located 50 yds. W of the east line on the south border.
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1-13 ft. Caliche, Rock
13-15 ft. Redbed
All formations dry.
- #5 Located 150 yds. W of east line on the north side.
0-1 ft. Top Soil

(F) Any other improvement as needed or required by CDD.

VII. DRAWING OF MONITOR WELL (attached)

Excavate land area down to redbed, dispose of contaminated soil in 6 in. lifts and till or plow every 12 to 60 days as needed to ensure proper aeration so soil can be cleaned up by natural remediation according to government standards. Have soil tested for TPH and BTEX before adding new lift as required.

VIII. CONTINGENCY PLAN (NA)

There will be no liquids at facility. Any soil accidentally spilled at facility will be picked up with front end loader and deposited within landfill. No material will be accepted without documentation.

IX. ROUTINE INSPECTION AND MAINTENANCE PLAN

- (1) Weekly inspection of monitor wells.
- (2) Road area around facility will be graded and kept free of oily dirt.
- (3) All loads will be documented and logged.
- (4) No liquids accepted.
- (5) No tank bottoms accepted.
- (6) Area will be posted with proper signs.
- (7) No dumping will be allowed unless facility is open.
- (8) May require letter from company showing waste has not been mixed with non-exempt waste.
- (9) All area properly fenced with locked gates.
- (10) Each lift will be tested for BTEX Method 602 and TPH Method 8015 EPA test requirements before adding new lift.

X. CLOSURE PLAN

All overburden will be removed down to the redbed, averaging from 12 ft. on the east side, to 16 ft. on the west side.

Placement of solids will start at redbed, when area has been filled and tested to within 1 ft. of surface elevation, area will be backfilled with top soil, mound over and compacted. The mound should prevent rain or water from standing or leaching into backfill.

All fences will be left in tact and monitor wells left in place for future monitoring.

11/11/91
10-20-91

1-14 ft. Caliche, Rock
14-17 ft. Redbed
All formations dry.

- * An area in the middle of the east edge of the property, was excavated with a backhoe. Rock and caliche at 0-12 ft. Redbed was encountered at 12 ft.

The wells were drilled with rotary rig, no water was encountered, only caliche, rock, and sand down to redbed. The redbeds came in at 12 ft. on the east side, down to 17 ft. on the west side. The five wells drilled were completed into the redbed and cased with 3 in. PVC pipe with 5 ft. of screen on bottom with the top 2 ft. cemented and capped. Wells to be secured with locks and used as monitor wells.

Researched State Engineers records and U.S.G.S. file, no fresh water was recorded or found within area of review. A physical inspection was made and a windmill was found approximately 1 mile SW of the site, a sample was taken and analysis recorded for future use.

We feel this is one of the better sites for deposit of contaminated soil due to the thickness of redbeds, little or no fresh water in the area, a monitor system is in place for control of system. This system is in the middle of the oil and gas production and will serve a valuable environmental need, both regulatory and industrial.

- XII. PROOF OF OCD RULE 711 (attached)
- XIII. CONTINGENCY PLAN FOR RELEASE OF H₂S (NA)

Open pit system should not have H₂S. If encountered, OCD Rule 118 will be adhered to.
- XIV. All State of New Mexico, Oil Conservation rules will be enforced as they pertain to this system.

C & C LANDFARM INC.

Additional information to Application for Surface Waste
Disposal.

ENVIRONMENTAL DIVISION
EOC 750

- I. The thickness of the redbeds varied from area to area RM 9 51
in Section 3. The information was taken from logs of
producing oil wells in the area and lithology reports.

Unit C	Top 20 ft.	Base 960 ft.
F	30 ft.	552 ft.
B	14 ft.	880 ft.
H	15 ft.	1350 ft.
M	30 ft.	1270 ft.
L	40 ft.	1050 ft.

with the average thickness being 987 ft.

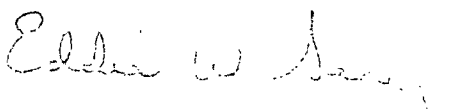
- II. Groundwater in the area; Figure I is a copy of the
State Engineer's water analysis and locations for this
area, none were listed in Sect. 3. The windmill SSW of
our proposed site appears to be located in Unit M of
Sect. 3 approximately 3/4 mile from site; Figure II is
a copy of analysis from S & W windmill. Figure III
indicates water wells in the general area showing top
and bottom of water formation and contour line
indicating direction of flow, which is SE. Figure IV
is a contour map of top of redbed, with slopes to the
SSE. Figure V is a contour map of the surface for the
surrounding area, the direction of slope is to the
west.

The contour maps provided are information from the
State Bureau of Mines, which shows any movement at our
site would run SE along the redbed surface and west
along the top of ground.

If the State feels it is necessary, additional monitor
wells can be installed or a redbed barrier constructed
on the SW portion of our site to prevent any
contaminate from moving.

- III. Also provided are the mail receipts from registered
letters.

Any additional information needed, please call (505)392-2235.


Eddie W. Seay
Peak Consulting

LOCATION		DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	State Cont. List of Wells in the area
3	20S 36E 09 13440	10/12/84	434	2350	63F	T00	Wells in the area
4							
5	20S 36E 10 32114	08/28/72	79	520		GAL	None listed in Sect 3
6	20S 36E 10 32114	11/01/76	66	889	66F	GAL	
7	20S 36E 10 32114	10/19/79	68	880	66F	GAL	
8	20S 36E 10 32114	10/12/84	92	980	64F	GAL	
9							
10	20S 36E 11 42243	08/28/72	1000	1450		GAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	GAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	GAL	L
13	20S 36E 11 42243	10/12/84	940	4330	64F	GAL	L
14							
15	20S 36E 15 242421	08/28/72	720	1800		GAL	L
16	20S 36E 15 242421	11/01/76	518	3223		GAL	L
17	20S 36E 15 242421	10/12/84	532	3630	63F	GAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	GAL	L
19							
20	20S 36E 15 24342	03/30/54	1080	6780		T00	L
21	20S 36E 15 24342	09/09/58	1240	7500		T00	L
22							
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
25							
26	20S 36E 26 24344	11/08/79	150	1790		T00	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	T00	L
28							
29	20S 36E 26 24443	11/08/79	182	1895		T00	L
30							
31	20S 36E 35 24444	11/08/79	118	1541		T00	L
32							
33	20S 37E 04 11114	04/02/54	430	2180		GAL	L
34	20S 37E 04 11114	04/22/55	425	2090		GAL	L
35	20S 37E 04 11114	09/09/58	325	1670		GAL	L
36							
37	20S 37E 04 221321	04/22/55	51	758		GAL	L
38	20S 37E 04 221321	09/09/58	47	708		GAL	L
39	20S 37E 04 221321	07/14/77	106	1070		GAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	GAL	L
41	20S 37E 04 221321	2/06/85	81	964		GAL	L
42							
43	20S 37E 05 222144	11/29/79	238	1611		T00	L
44	20S 37E 05 222144	9/26/84	314	1729		T00	L
45							
46	20S 37E 07 24331	11/09/79	1268	4232		T00	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	T00	L
48							
49	20S 37E 08 244124	11/29/79	868	5734	57F	T00	L 07620 E8
50							
51	20S 37E 08 426223	11/23/79	520	2396	66F	T00	L
52	20S 37E 08 426223	9/26/84	884	3806		T00	L
53							
54							
55							
56							
57							
58							
59							
60							

WATER ANALYSIS REPORT

Company : S & W CATTLE CO
 Address : HOBBS, NEW MEXICO
 Lease : SECT 3 T20 R37
 Well : UNIT M
 Sample Pt. : WINDMILL

Date : 10/29/91
 Date Sampled : 10/28/91
 Analysis No. : 876

ANALYSIS		mg/L		* meq/L
1. pH	7.1			
2. H ₂ S	NEGATIVE			
3. Specific Gravity	1.000			
4. Total Dissolved Solids		2245.2		
5. Suspended Solids				
6. Dissolved Oxygen				
7. Dissolved CO ₂				
8. Oil In Water				
9. Phenolphthalein Alkalinity (CaCO ₃)				
10. Methyl Orange Alkalinity (CaCO ₃)		291.0		
11. Bicarbonate	HCO ₃	355.0	HCO ₃	5.8
12. Chloride	Cl	599.1	Cl	16.9
13. Sulfate	SO ₄	575.0	SO ₄	12.0
14. Calcium	Ca	153.5	Ca	7.7
15. Magnesium	Mg	66.1	Mg	5.4
16. Sodium (calculated)	Na	496.4	Na	21.6
17. Iron	Fe	0.0		
18. Barium	Ba	0.0		
19. Strontium	Sr	0.0		
20. Total Hardness (CaCO ₃)		655.6		

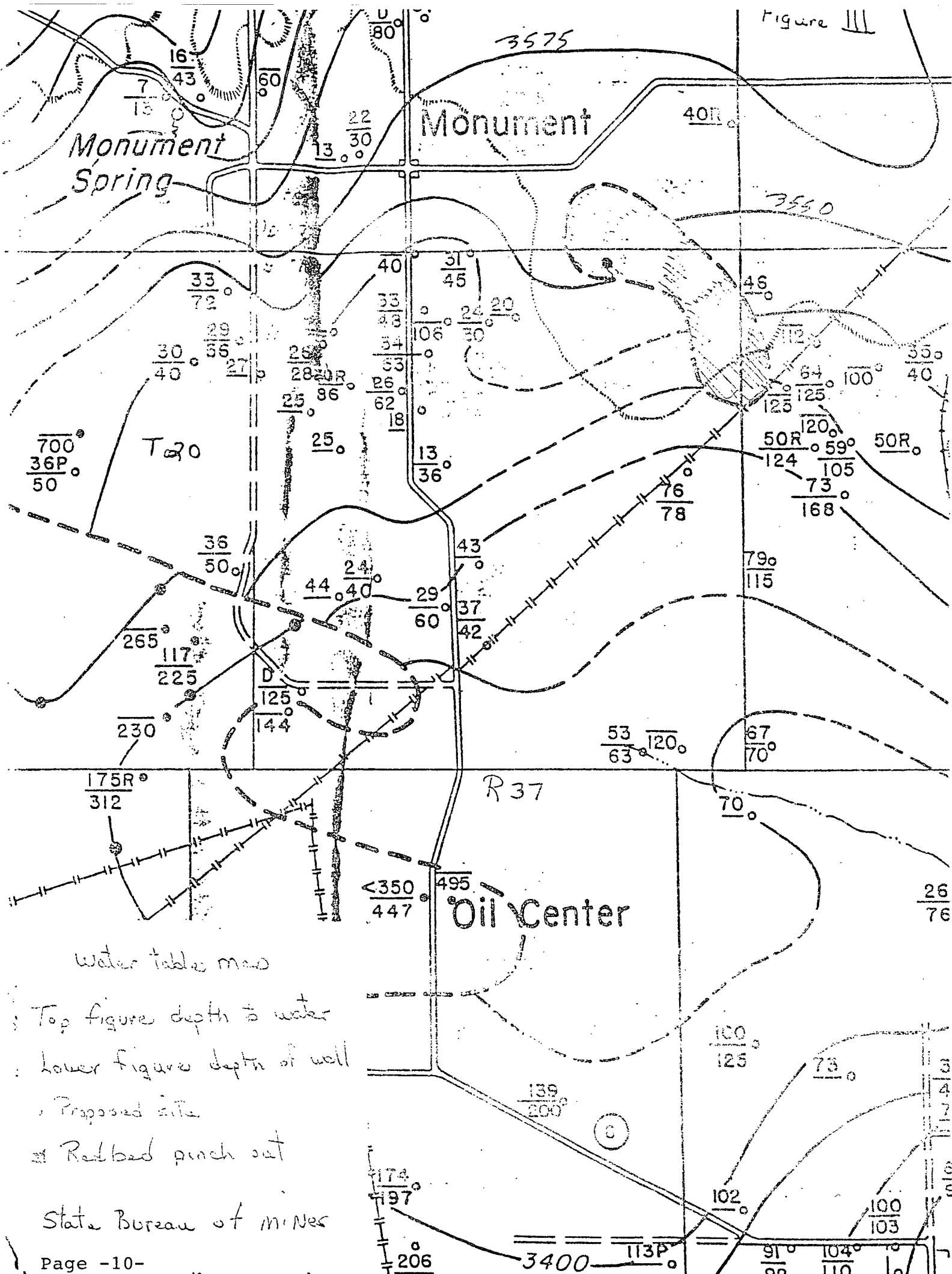
PROBABLE MINERAL COMPOSITION

*milli equivalents per Liter		Compound	Equiv wt X meq/L	=	mg/
8 *Ca <----- *HCO ₃	6	Ca(HCO ₃) ₂	81.0	5.8	472
/----->		CaSO ₄	68.1	1.8	125
5 *Mg -----> *SO ₄	12	CaCl ₂	55.5		
<-----/		Mg(HCO ₃) ₂	73.2		
22 *Na -----> *Cl	17	MgSO ₄	50.2	5.4	327
		MgCl ₂	47.6		
Saturation Values Dist. Water 20 C		NaHCO ₃	34.0		
CaCO ₃ 13 mg/L		Na ₂ SO ₄	71.0	4.7	333
CaSO ₄ * H ₂ O 2090 mg/L		NaCl	35.4	16.9	988
BaSO ₄ 2.4 mg/L					

REMARKS: EDDIE SEAY

Petrolite Oilfield Chemicals Group

Respectfully submitted,
 ROZANNE JOHNSON



- Top figure depth to water
- Lower figure depth of well
- Proposed site
- at Redbed pinch out

Page -10-

Figure IV

Contour of
top of Rubber
Proposed site

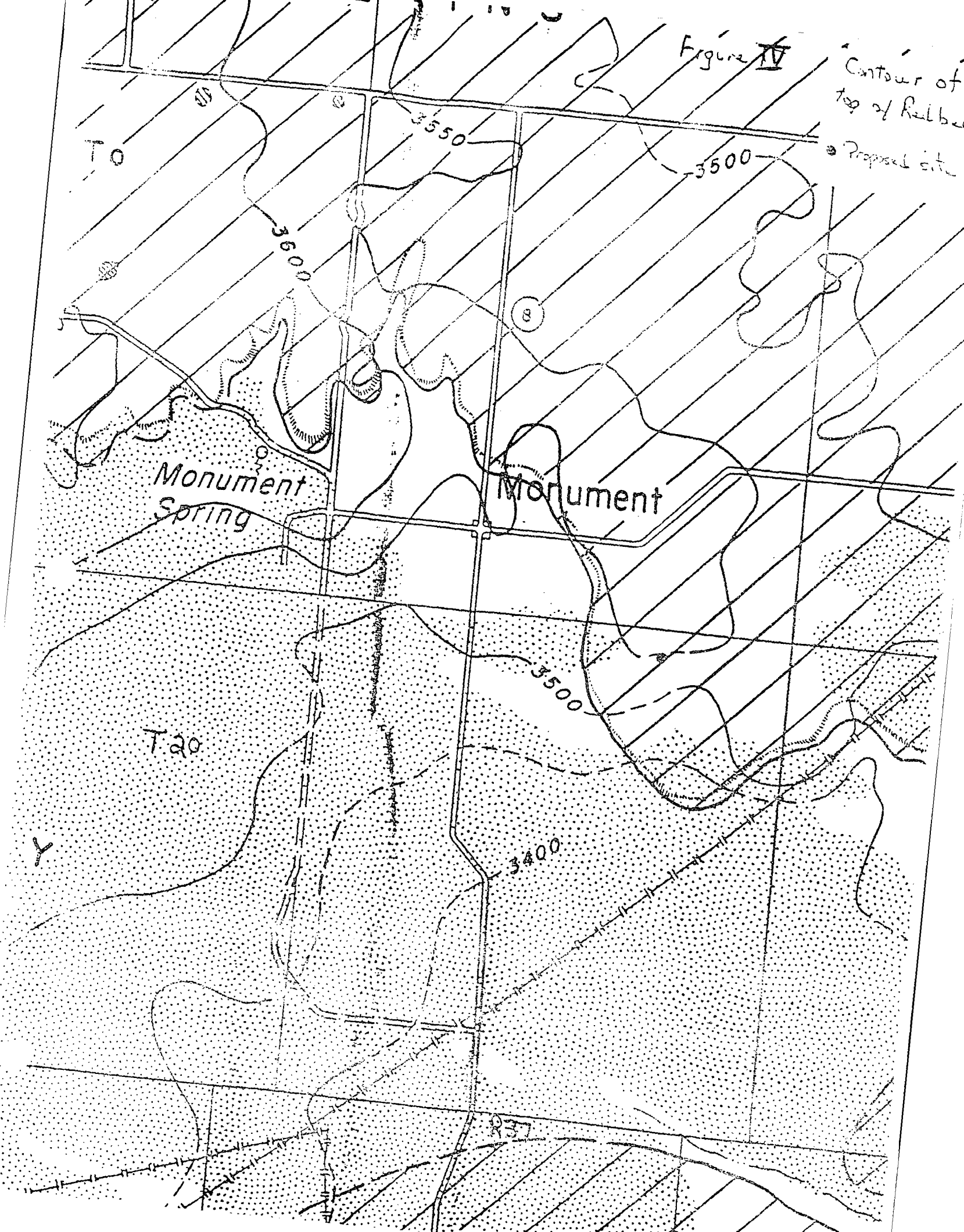


Figure II

Surface
contour
map

• Proposed
S.T.

Monument

MONUMENT JAIL

OIL FIELD

1084° Well

Pipeline

White Brooks

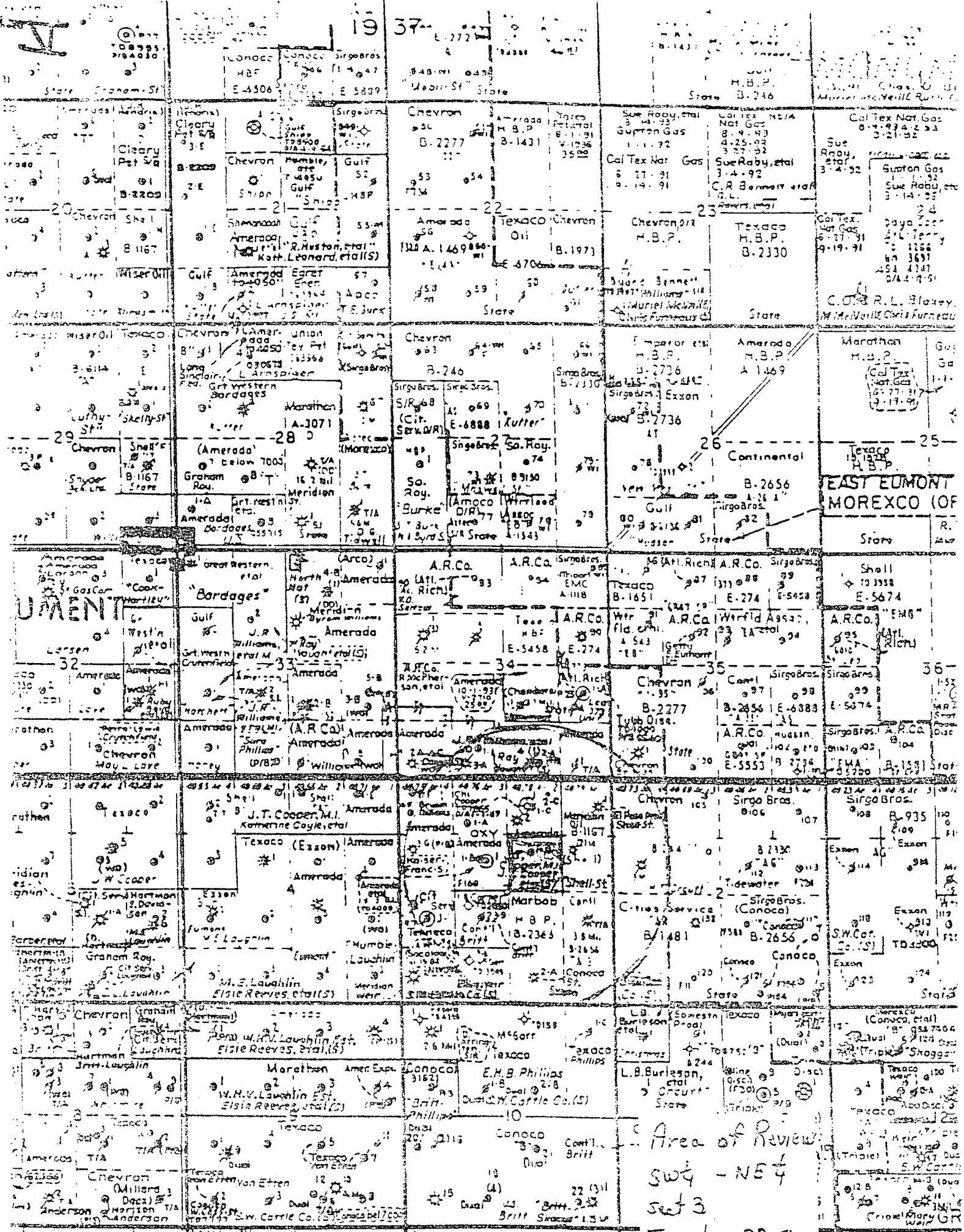
Gravel
pit

• Well

1075

1065

Well



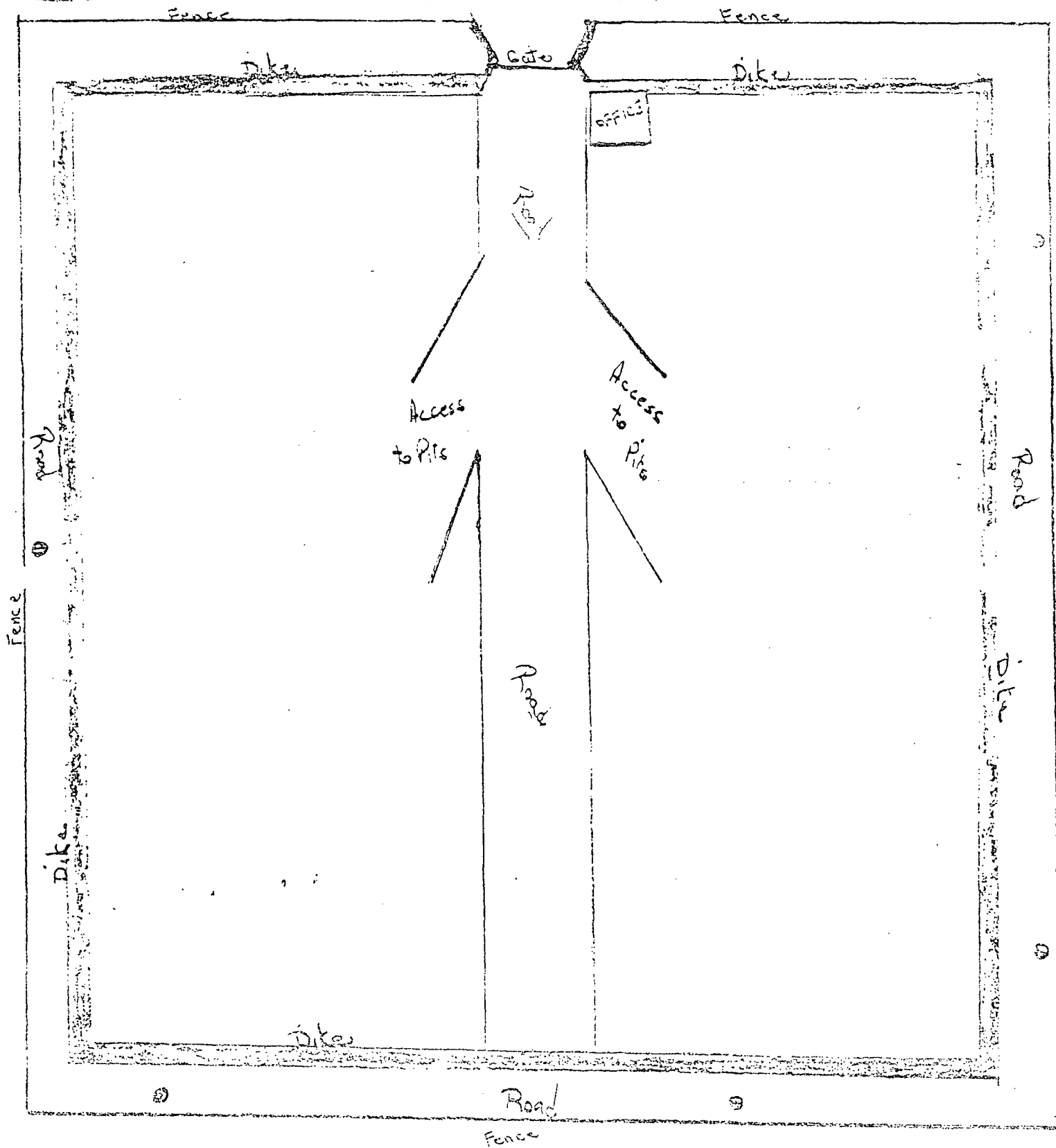
Area of Review

SW 1/4 - NE 1/4

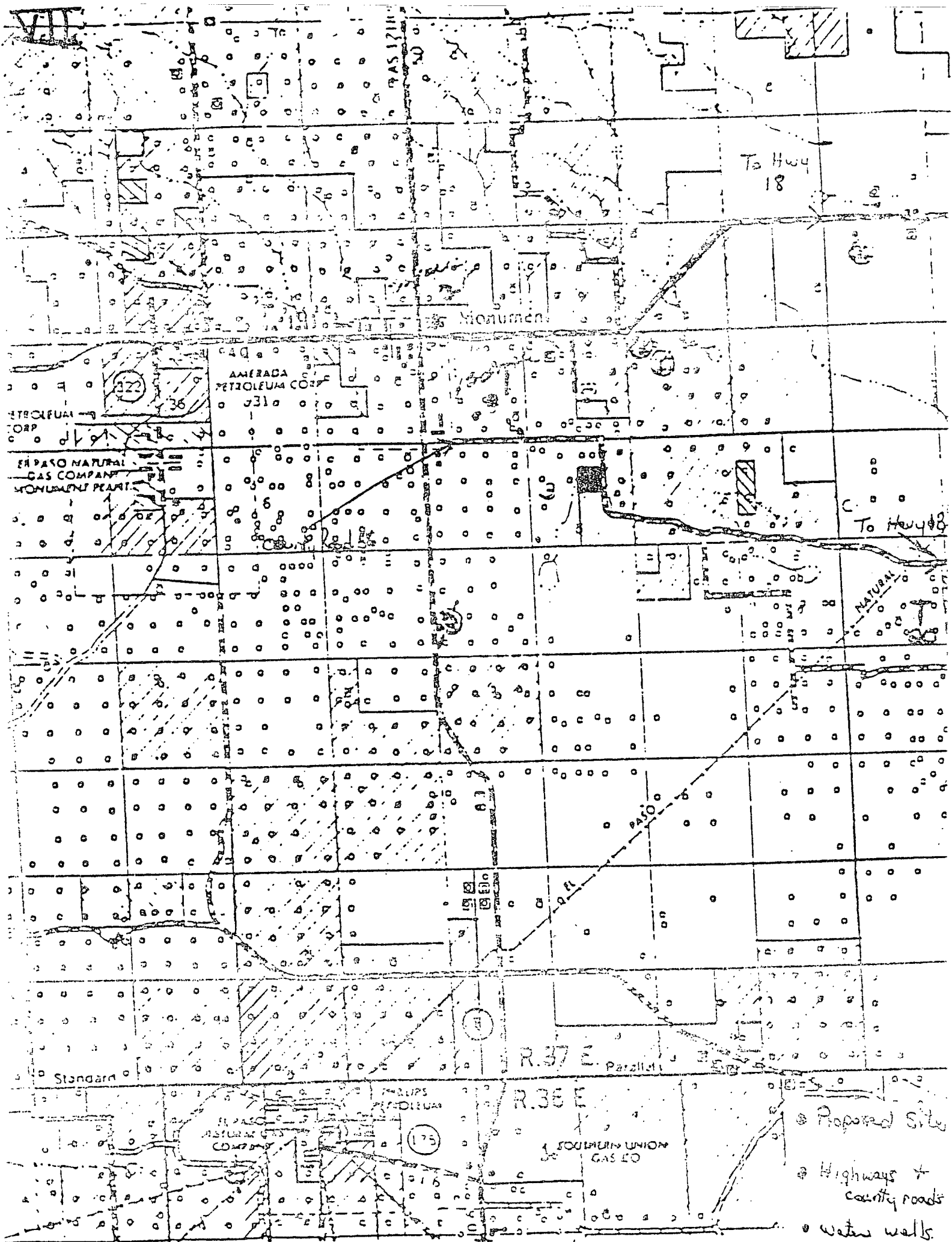
set 3

Township 20 S

Range 37 E



- Monitor wells
- Burns or Dyke
- Disposal Area



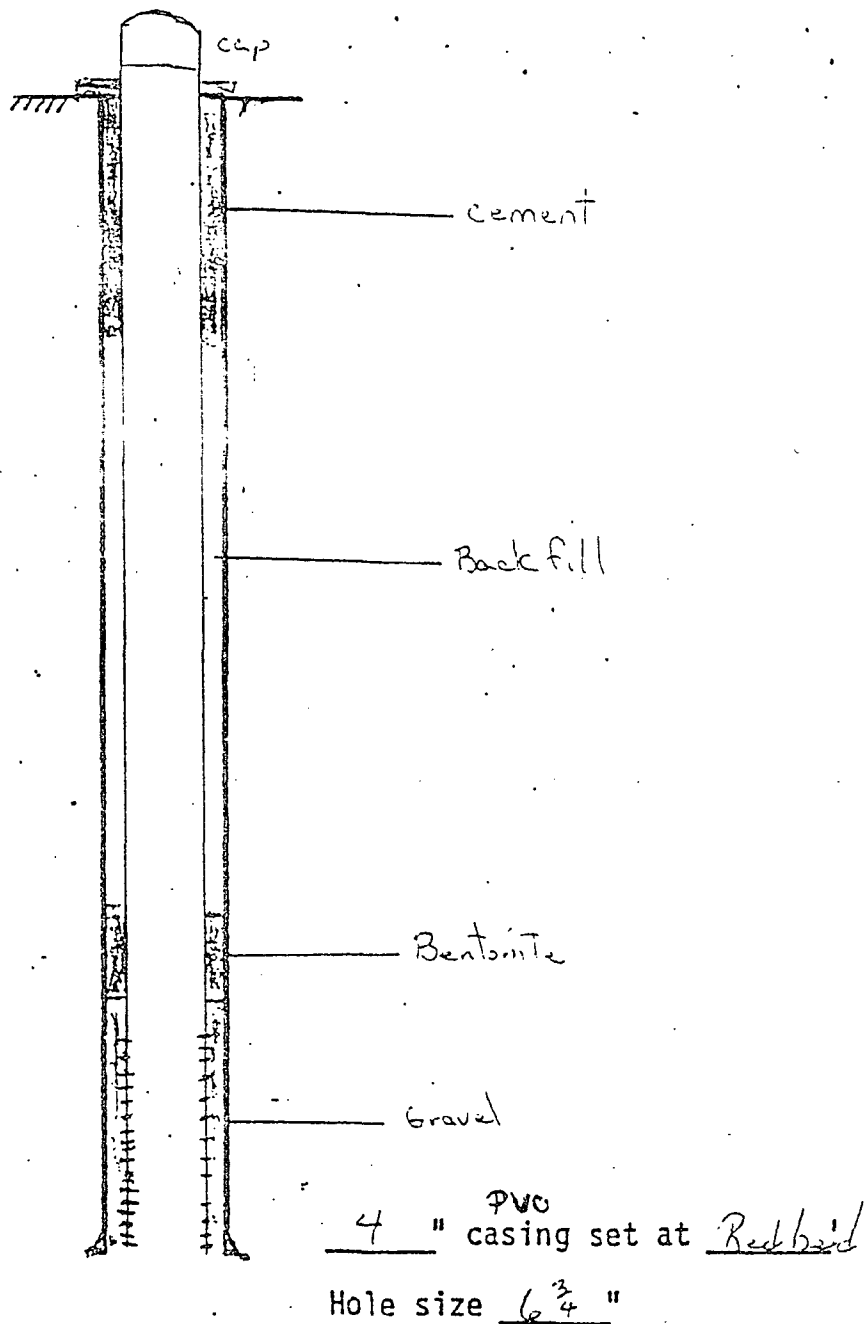
To Hwy
18

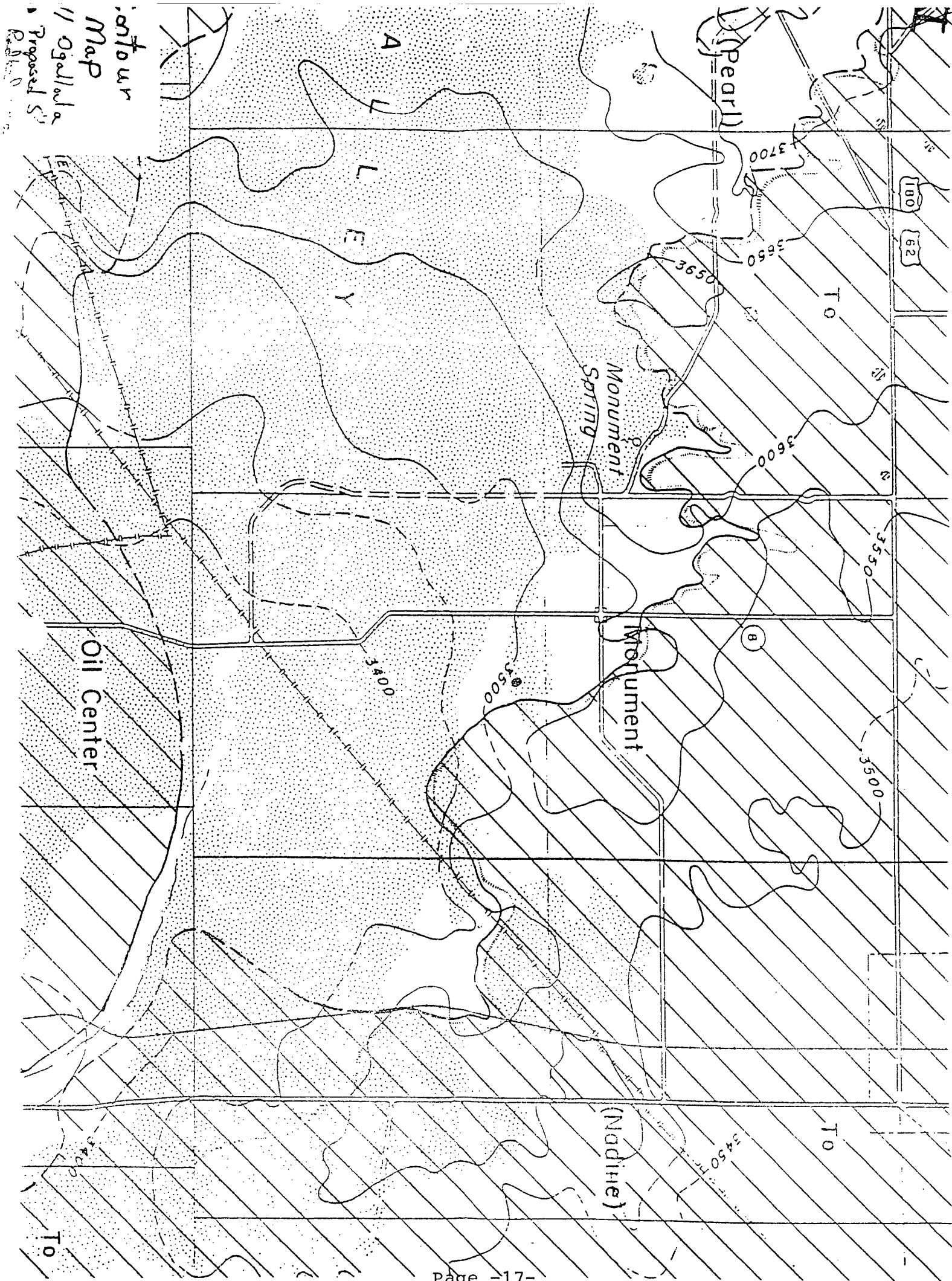
To Hwy 48

- Proposed Site
- Highways & county roads
- water wells

VII

Test well - Monitor well





contour
Map

11 Ogallala
Proposed S
Rd 110

111

P 661 750 233

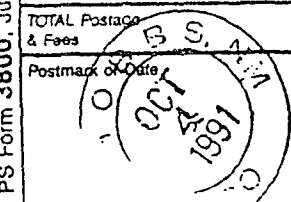


Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
S & W Cattle Co.	
Street & No.	
8900 S. County Rd. 58	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990



P 661 750 231

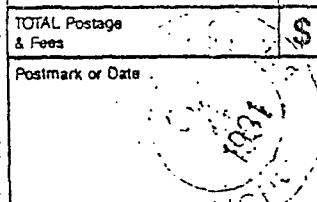


Certified Mail Receipt

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Do not use for International Mail
(See Reverse)

Sent to	
Commissioner of Public Lands	
Street & No.	
P.O. Box 1148	
P.O., State & ZIP Code	
Santa Fe, NM 87504	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990



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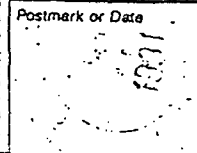


Certified Mail Receipt

No Insurance Coverage Provided
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(See Reverse)

Sent to	
Mr. A.C. Doyall	
Street & No.	
P.O. Box 188	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

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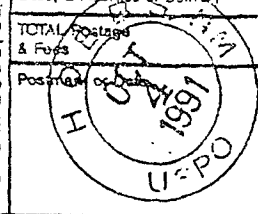


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No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Mr. Jimmie T. Cooper	
Street & No.	
Box 55	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990



P 661 750 232

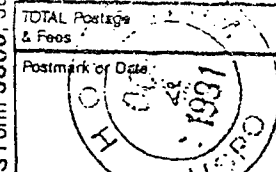


Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
J.R. Williams, et al	
Street & No.	
P.O. Box 215	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990



XII

C & C Landfarm Inc.

Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

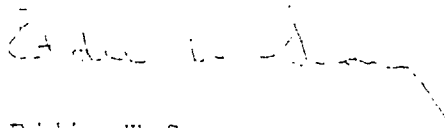
Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5324

Thank You.



Eddie W. Seay
Peak Consulting Service

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to Apollo Realty ATTN: J. B. Williams P.O. Box 75285 Albuquerque, NM 87194-0285		4. Article Number P 661 750 228
5. Signature - Addressee <i>[Signature]</i> X		Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee of agent and DATE DELIVERED.
6. Signature - Agent <i>[Signature]</i> X		
7. Date of Delivery 10-15-91		8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1089-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Mr. & W. Cattle Co.
P.O. Box 1799
Hobbs, NM 88240

4. Article Number
P 661 750 229

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise
 Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

Signature - Addressee

Signature - Agent
A. R. R. R.

Date of Delivery

Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Mr. A.C. Doyall
P.O. Box 188
Monument, NM 88265

4. Article Number
P 661 750 230

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise
 Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

Signature - Addressee
A. C. Doyall

Signature - Agent

Date of Delivery

Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Mr. Jimmie T. Cooper
P.O. Box 55
Monument, NM 88265

4. Article Number
P 661 750 234

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise
 Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

Signature - Addressee
J. T. Cooper

Signature - Agent

Date of Delivery

Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:

Commissioner of Public Lands
State of New Mexico
NM State Land Office
P.O. Box 1148
Santa Fe, NM 87504

4. Article Number
P 661 750 231

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise
 Always obtain signature of addressee or agent and DATE DELIVERED.

8. Addressee's Address (ONLY if requested and fee paid)

Signature - Addressee
J. T. Cooper

Signature - Agent

Date of Delivery

Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

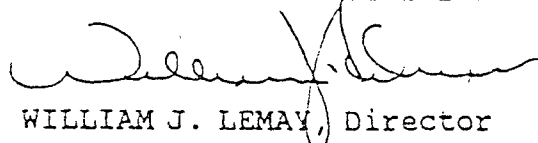
Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following application to construct and operate a commercial surface waste disposal facility has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

C & C Landfarm Inc., Eddie W. Seay, Agent, P.O. Box 55, Monument, New Mexico 88265, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed location of the facility is the SW/4 NE/4, Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The facility is proposed to consist of a land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. Groundwater most likely to be affected by any accidental discharges at the surface is not known to be present in the area of one-half mile from the boundaries of the facility. The facility is underlain by redbeds ranging in thickness from 430 to 1200 feet.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 18th day of November, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L



BRUCE KING
GOVERNOR

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

February 21, 1992

CERTIFIED MAIL

RETURN RECEIPT NO. P-670-683-494

Mr. Jimmie T. Cooper
C & C Landfarm Inc.
Box 55
Monument, New Mexico 88265

RE: Landfarm Request, C & C Landfarm Inc.
Lea County, New Mexico

Dear Mr. Cooper:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced application for an oil field related solids landfarm located in the SW/4 NE/4, Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico. The following comments and requests for additional information are based on review of the application, dated October 4, 1991, and inspection of the proposed facility on February 11, 1992 by representatives of the OCD and C & C Landfarm Inc. In order for the review process to continue the OCD requires the following information:

1. In your surface disposal application you propose to construct a pit by excavating down to the top of the redbed (about 10 to 12 feet) and using the overburden (caliche) to build berms around the site. The OCD is concerned with the possibility of contaminants migrating off of your property along the surface of the redbed. The OCD requires a detailed description of how C & C plans to prevent the migration of contaminants down gradient along the redbed surface. If there are any modifications or additions to the original application, please submit detailed descriptions and diagrams. Include the dimensions (3-D) of the proposed facility (pit) along with a cross-sectional diagram.

Mr. Jimmie T. Cooper
February 21, 1992
Page 2

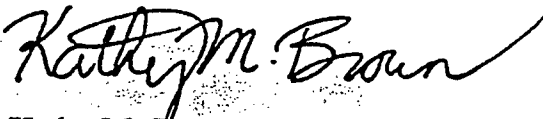
2. Constuction of your present monitor wells does meet the current OCD standards and recommendation for monitor well construction. If any monitor wells are constructed in the future please submit drilling and completion plans for OCD approval prior to conducting operations.
3. The OCD has stringent requirements for the operation of all OCD regulated landfarms. A commitment to the following conditions is required prior to OCD approval of commercial landfarms:
 - a. All soils received at the facility will be spread and disked within 72 hours of receipt.
 - b. Solids will be spread on the surface in six inch lifts or less.
 - c. Solids will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
 - d. No solids will be spread on previously spread solids until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 ppm and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
 - e. Only solids that are non-hazardous by RCRA Subtitle C or by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt will be accepted on a case-by-case basis and with OCD approval.
 - f. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) analysis for hazardous constituents if required, 3) transporter.

Mr. Jimmie T. Cooper
February 21, 1992
Page 3

- g. OCD approval must be obtained prior to the addition of any substances to enhance biodegradation of the soils landfarmed (ie. chemical additives, manure, nutrients, bugs, ect.).
 - h. No free liquids or soils with free liquids will be accepted at the facility.
4. The OCD is concerned about the impact of disposal facilities on private residences. Please submit a map showing all private residences within one mile of the proposed facility. Include the name and land status of the resident.

Submission of the above requested information will allow the review process to continue. If you have any questions please do not hesitate to contact me at (505) 827-5884.

Sincerely,



Kathy M. Brown
Geologist

cc: Jerry Sexton, OCD Hobbs Office
Chris Eustice, OCD Hobbs Office
Mike Pierce, Peak Consulting

PEAK

CONSULTING SERVICES
ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

P.O. BOX 636
HOBBS, NEW MEXICO 88240
OFFICE (505) 392-1915



PCS

March 2, 1992

Kathy M. Brown
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Re: Response to letter dated February 21, 1992
C & C Landfarm Inc.

Dear Ms. Brown:

This letter is in response to the Oil Conservation Divisions' requests and concerns regarding C & C Landfarm Inc.'s application. Please find enclosed the information you require:

1. C & C Landfarm Inc. proposes to install a redbed dike on the south, west, and north edges of the property to prevent any migration of fluids from the property. This dike will consist of a trench approximately 2 - 3 feet wide. This trench will be deep enough to penetrate the redbed interval to a depth of approximately 2 feet. The trench will then be backfilled and compacted with redbed material from the working pit. (Fig. 1)

This dike will be situated between the property line and the monitor wells previously installed. (Fig. 1)

The pit will be excavated to approximately 1 foot above the top of the redbed. (Fig. 1)

2. C & C Landfarm Inc. will seek OCD approval before any additional monitor wells are drilled.

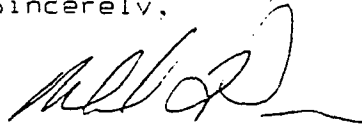
OCD Resoonse
February 28, 1992
Page 2

3. C & C Landfarm Inc. acknowledges items A thru H of part three of the letter dated February 21, 1992, and agrees to comply with all conditions.
4. Figure 2 is a map showing all private residences within one mile of the facility. At the present time only one residence is within one mile. This residence is owned by Mr. A.C. Doyall, and he was provided with a copy of the original application by C & C Landfarm Inc..

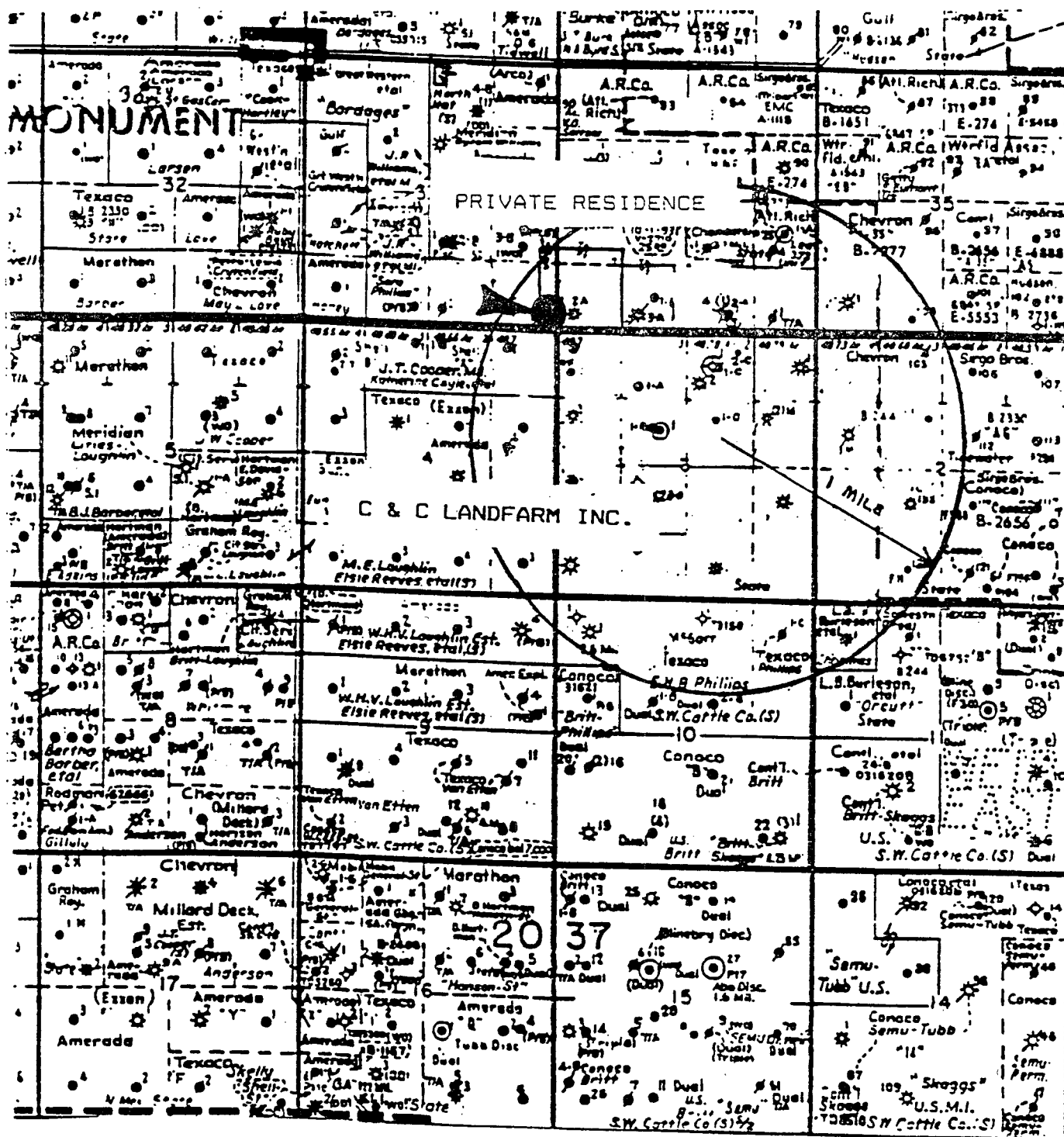
The pit occupies approximately 2 acres at this time. C & C Landfarm Inc. request that the entire 40 acre tract be permitted for landfarming. This way the pit can be expanded as needed.

C & C Landfarm Inc. and Peak Consulting Services appreciates the time and effort that the Oil Conservation Division has invested in this project. We are committed to provide a quality facility that the Oil Industry can depend on and have confidence in. If we can be of further assistance, please lets us know.

Sincerely,



Michael L. Pierce
Peak Consulting Services



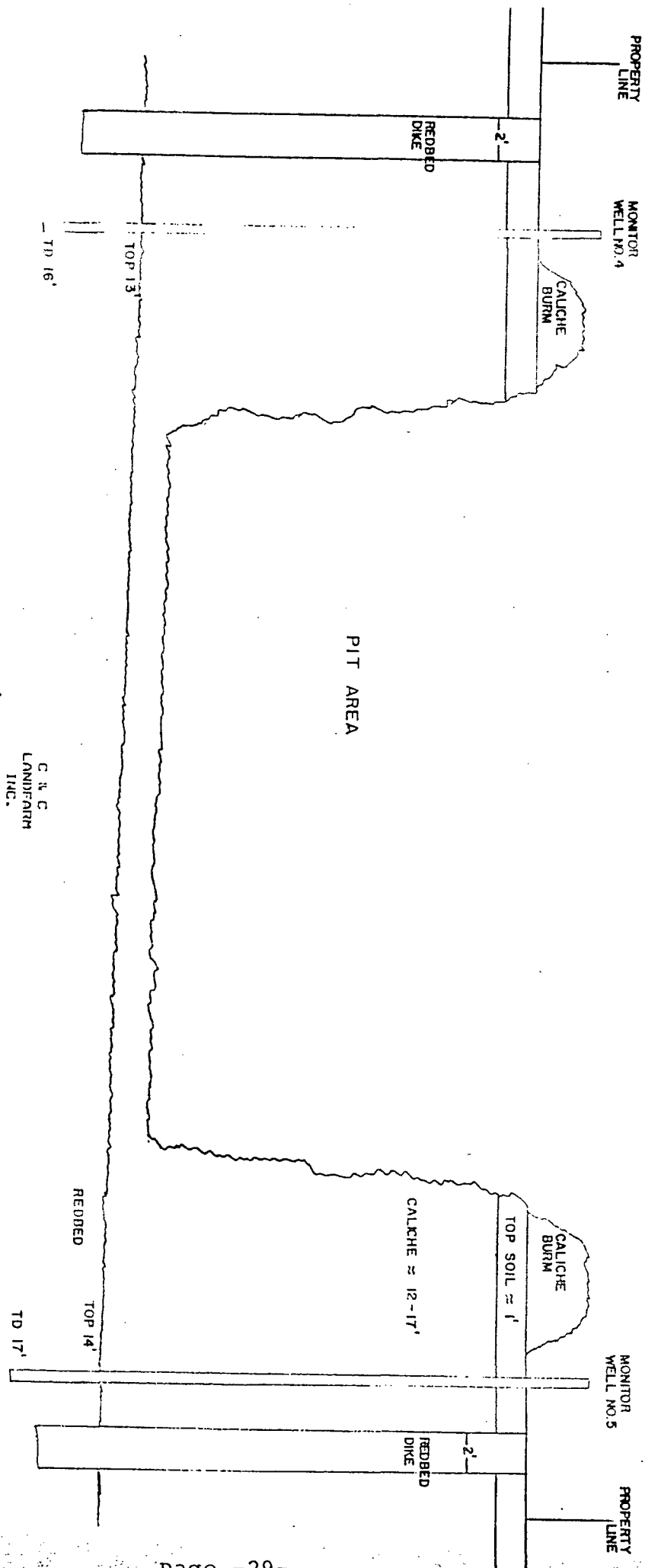
C & C LANDFARM INC.

LOCATION MAP OF PRIVATE RESIDENCES WITHIN ONE MILE OF THE FACILITY

Figure 2

FIGURE 1

NORTH - SOUTH CROSS SECTION OF PIT FACILITY



Vertical Scale 1" = 3'
No Horizontal Scale



BRUCE KING
GOVERNOR

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

April 3, 1992

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-576

Mr. Walter C. Laughlin
4139 E. Laughlin Road
Casa Grande, Arizona 85222

RE: C & C Landfarm Inc. Application

Dear Mr. Laughlin:

The Oil Conservation Division (OCD) has received your December 20, 1991 protest to the C & C Landfarm Inc. application. The OCD is the state agency which permits commercial surface disposal facilities.

The process that the OCD uses to review surface disposal applications is comprehensive and ongoing. The applicant submits the initial application, it is thoroughly reviewed, and if necessary additional information and commitments are requested to satisfy specific OCD requirements. After all of the required information is submitted and evaluated an ultimate determination is made as to whether or not the facility can be operated in a manner which is consistent and in compliance with the regulations of the Division.

In determining whether a specific facility is approvable the OCD must insure that there will be sufficient protection of ground water, human health, and the environment. The OCD cannot deny an application solely on the basis that the use is incompatible with surrounding land uses or local zoning requirements. The OCD has no jurisdiction or authority to enforce compliance with those regulations.

The OCD incorporated all letters of protest into review of the initial C & C Landfarm application. Upon completing review of the application the OCD requested additional information and commitments from C & C Landfarm. The OCD has received and reviewed C & C Landfarm's response dated March 2, 1992. The application at this time is administratively approvable since it meets all of the technical requirements to protect ground water, human

Mr. Walter C. Laughlin
April 3, 1992
Page 2

health, and the environment. Both the original application and supplemental materials are on file at the OCD Santa Fe Office. These records are open for public inspection from 8:00 a.m. to 4:00 p.m., Monday through Friday.

The OCD is giving all protestors the opportunity to evaluate the application and respond with substantive technical information. Active participation by informed neighboring landowners can be very useful to the Division to insure that the facility is permitted with appropriate operational requirements. As previously stated, the OCD cannot consider land use or zoning requirements when evaluating surface disposal applications.

Please submit all comments to the OCD within 30 days from receipt of this letter. If you have any questions please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown

Kathy M. Brown
Geologist

xc: Chris Eustice, OCD Hobbs Office
Bob Stovall, General Counsel
Jimmie T. Cooper, C & C Landfarm Inc.
Mike Pierce, Peak Consulting

SENDER:-

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Walter C. Laughlin
4139 E. Laughlin Rd.
Casa Grande, Arizona
85222

Walter Laughlin
5. Signature (Addressee)

6. Signature (Agent)

4a. Article Number

P-670-683-576

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

4-6-92

8. Addressee's Address (Only if requested and fee is paid)



BRUCE KING
GOVERNOR

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

May 20, 1992

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-594

Mr. Walter C. Laughlin
4139 E. Laughlin Road
Casa Grande, Arizona 85222

RE: C & C Landfarm Inc. Application

Dear Mr. Laughlin:

The Oil Conservation Division (OCD) permits commercial surface disposal facilities which receive oil field related waste. The C & C Landfarm Inc. proposed commercial surface disposal facility has been determined to be approvable subject to the attached conditions. The application and supplemental information submitted are in compliance with all Division rules and regulations, and are open for public inspection at the OCD Santa Fe Office.

You filed an objection to the application of C & C Landfarm Inc. If you still object to the application and wish to present technical testimony at a hearing in Santa Fe, please submit a request for hearing within 20 days of date of this letter or by June 9, 1992. Your request should include a concise statement of your objection or concern and a summary of the evidence you will present at hearing. If the Director determines that intervenors such as yourself have significant additional information to offer, the matter will be set for hearing. The OCD cannot consider land use or zoning requirements when evaluating surface disposal applications.

If no request for hearing is received by June 9, 1992, then the application will be administratively approved. If you have any questions please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

Attachment

xc: Chris Eustice, OCD Hobbs Office
Jimmie T. Cooper, C & C Landfarm Inc.
Mike Pierce, Peak Consulting

ATTACHMENT

(May 20, 1992)

C & C LANDFARM INC. APPLICATION OCD CONDITIONS OF APPROVAL

1. All soils received at the facility will be spread and disked within 72 hours of receipt.
2. Solids will be spread on the surface in six inch lifts or less.
3. Solids will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
4. No solids will be spread on previously spread solids until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 ppm and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
5. Only solids that are non-hazardous by RCRA Subtitle C or by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt will be accepted on a case-by-case basis and with OCD approval.
6. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) analysis for hazardous constituents if required, 3) transporter.
7. OCD approval must be obtained prior to the addition of any substances to enhance biodegradation of the soils landfarmed (ie. chemical additives, manure, nutrients, bugs, ect.).
8. No free liquids or soils with free liquids will be accepted at the facility.
9. If any monitor wells are constructed in the future the drilling and completion plans will be submitted for OCD approval prior to conducting operations.
10. A redbed dike will be installed on the south, west, and north edges of the property as proposed in the C & C correspondence dated March 2, 1992.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 10507
ORDER NO. R-9769

APPLICATION OF C & C LANDFARM, INC.
FOR A COMMERCIAL SURFACE WASTE
DISPOSAL FACILITY, LEA COUNTY, NEW MEXICO

ORDER OF THE DIVISION

BY THE DIVISION:

This cause came on for hearing at 8:15 a.m. on Tuesday, September 1, 1992, at Santa Fe, New Mexico, before Examiner Michael E. Stogner in Docket No. 27-92.

NOW, on this 16th day of November, 1992 the Division Director, having considered the testimony, the record and the recommendations of the Examiner, and being fully advised in the premises,

FINDS THAT:

(1) Due public notice having been given as required by law, the Division has jurisdiction of this cause and the subject matter thereof.

(2) Sections 70-2-12.B(21) and (22), N.M.S.A. (1978) Compilation, also known as the New Mexico Oil and Gas Act, authorizes the New Mexico Oil Conservation Division (Division) to regulate the disposition of non-domestic wastes resulting from various oil and gas activities and operations and to protect public health and the environment.

(3) The applicant, C & C Landfarm, Inc., (C & C) originally filed its application, pursuant to General Rule 711 with the Division on October 8, 1991 for authorization to construct and operate a commercial "landfarm" facility for the remediation of non-hazardous hydrocarbon contaminated soils utilizing an enhanced biodegradation process on a site located in the SW/4 NE/4 (Unit G) of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico, which is located

approximately two miles southeast of Monument, New Mexico. The term "non-hazardous" in this matter is synonymous with the terminology and usage in the Resource Conservation and Recovery Act (RCRA) Subtitle C regulations.

(4) This application, subsequent to review by the Division, has been administratively determined to be approveable and this hearing was scheduled to allow interested parties the opportunity to present technical evidence why this application should not be approved pursuant to the applicable rules of the Division.

(5) Within the required time frame and in accordance with Division rules, five parties of interest filed written objections to the proposed facility:

- | | |
|--|--|
| a) Walter C. Laughlin
4139 E. Laughlin Road
Casa Grande, Arizona 85222 | b) Larry N. Henry
500 E. Scharbauer
Hobbs, New Mexico 88240 |
| c) Elsie M. Reeves
3902 W. Keim Drive
Phoenix, Arizona 85019 | d) W. T. Stradley, President
S-W Cattle Company
P.O. Box 1799
Hobbs, New Mexico 88241 |
| e) Ken Marsh
Controlled Recovery, Inc.
P.O. Box 369
Hobbs, New Mexico 88241 | |

(6) At the time of the hearing Elsie M. Reeves and W. Trent Stradley entered appearances through counsel in objection to this matter.

(7) Also at the hearing, all previous correspondence, letters, applications from the applicant, notices and other such pertinent material prepared by the Division, interested parties, other state and federal agencies and the applicant were made part of the record in this case.

(8) The proposed landfarm is to be located on a forty-acre tract of land, as described in Finding Paragraph No. 3, which is bordered by Lea County Road No. 58 on the east. C & C proposes to excavate on the property as needed down to the top of the "redbed", which is a thick layer of relatively impermeable clays. Oilfield contaminated soils will be trucked to the site and broadcast within the excavated site(s) in six-inch lifts; these soils will be tilled or plowed to ensure proper aeration and bio-

remediation to proper governmental standards. New lifts will be added in the above-described method until an excavated area has been filled and properly tested to within one foot of the surrounding surface elevation, the area will then be backfilled with topsoil, mound over and compacted to prevent rainfall from standing or leaching into backfill. All should be constructed, operated and maintained in accordance with applicable NMOCD rules and standards.

(9) There is a need for such solids disposal facilities in Southeastern New Mexico to provide environmentally safe and cost effective means of disposing of such solid wastes in connection with oil and gas operations, and approval of a properly designed facility will help to prevent illegal dumping of solid material in a manner which could endanger the environment.

(10) Applicant appeared at the hearing and presented testimony about the design and operational standards and established a prima facie showing that the facility could be designed and operated so as to protect fresh water supplies and not constitute an unreasonable harm to human health and the environment if standards for such operation are met and followed.

(11) Testimony presented in this matter indicates that the proposed facility can be constructed and operated in a manner that will not cause contamination of underground fresh water resources, will not leach-out and migrate onto off-setting properties, can be operated and maintained in a safe manner and will not cause waste.

(12) "Conditions of Approval" should be adopted by this order which will assure safe operations and provide an adequate monitoring system to detect any leaching process or movement of contaminants that could cause the pollution of nearby underground fresh water supplies.

IT IS THEREFORE ORDERED THAT:

(1) The applicant, C & C Landfarm, Inc., is hereby authorized to construct and operate a commercial "landfarm" facility for the remediation of non-hazardous hydrocarbon contaminated soils utilizing an enhanced biodegradation process on a site located in the SW/4 NE/4 (Unit G) of Section 2, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico.

PROVIDED HOWEVER THAT the proposed facility shall be constructed and operated in accordance with the permit conditions attached hereto as Exhibit "A" which are incorporated herein and made a part of this order, and in accordance with such

additional conditions and requirements as may be directed by the Division Director, and shall be operated and maintained in such a manner as to preclude spills, fires, limit emissions and protect persons, livestock and the environment.

PROVIDED FURTHER THAT, prior to initiating operations, the facility shall be inspected by a representative of the Hobbs District Office in order to determine the adequacy of fences, gates and cattle guards necessary to preclude livestock and unauthorized persons from entering and/or utilizing said facility, and also to determine the adequacy of dikes and berms to assure safe facility operations.

(2) Prior to commencing operations on said facility, the applicant shall submit, to the Santa Fe office of the Division, a surety or cash bond pursuant to General Rule 711, in the amount of \$25,000 in a form approved by the Division.

(3) The Director of the Division shall be authorized to administratively grant approval for the expansion or modification of the proposed disposal facility.

(4) Authority for operation of the "landfarm" facility shall be transferrable only upon written application and approval by the Division Director.

(5) Authority for operation of the "landfarm" facility shall be suspended or rescinded whenever such suspension or rescission should appear necessary to protect human health or property, to protect fresh water supplies from contamination, to prevent waste, or for non-compliance with the terms and conditions of this order or Division Rules and Regulations.

(6) The permit granted by this order shall become effective only upon acceptance and certification by the applicant.

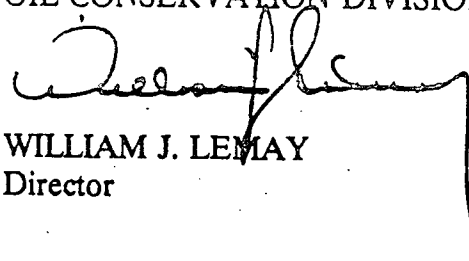
(7) The Division shall have the authority to administratively change any condition of this permit to protect fresh water, human health and the environment. Applicant may request a hearing upon any change which materially affects the operation of the facility.

(8) Jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

Case No. 10507
Order No. R-9769
Page No. 5

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY
Director

SEAL

Exhibit "A"
Case No. 10507
Order No. R-9769

**C & C LANDFARM, INC. APPLICATION
OCD CONDITIONS OF APPROVAL**

LANDFARM OPERATIONS

1. Disposal will only occur when an attendant is on duty. The facility will be secured when no attendant is present.
2. The facility will be fenced and have a sign at the entrance. The sign will be legible from at least fifty (50) feet and contain the following information: a) name of the facility, b) location by section, township and range, and c) emergency phone number.
3. A redbed dike will be installed on the south, west and north edges of the property as proposed in C & C's correspondence dated March 2, 1992.
4. All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
5. Soils will be spread on the surface in six-inch lifts or less.
6. Soils will be disked a minimum of one time every two weeks (bi-weekly) to enhance biodegradation of contaminants.
7. Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lifts is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of the laboratory analysis and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
8. Only oilfield wastes which are exempt from Federal Resource Conservation and Recovery Act (RCRA), (42 U.S.C. §§6921-6939b), Subtitle C regulations (40 C.F.R. Parts 260-272) will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results may be submitted to the OCD along with a request to receive non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any

Exhibit "A"

Case No. 10507

Order No. R-9769

Page 2

non-oilfield wastes which are RCRA Subtitle C exempt or are non-hazardous by characteristic testing will only be accepted on a case-by-case basis and with prior OCD approval. Comprehensive records of all laboratory analyses and sample locations will be maintained by the operator.

9. Moisture will be added as necessary to enhance biodegradation and to control blowing dust. There will be no ponding, pooling or run-off of water allowed. Any ponding of precipitation will be removed within seventy-two hours of discovery.

CLOSURE

When the facility is to be closed, no new material will be accepted. Existing soils will be remediated until they meet the OCD standards in effect at the time of closure. The area will then be reseeded with natural grasses and allowed to return to its natural state. Closure will be pursuant to all OCD requirements in effect at the time of the closure.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

January 6, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-935

Mr. Jimmie T. Cooper
C & C Landfarm Inc.
Box 55
Monument, New Mexico 88265

RE: C & C Landfarm Inc.
Oil Conservation Commission Hearing
Eddy County, New Mexico

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) has reviewed both the Division Order issued November 16, 1992 for C & C Landfarm, Inc., and the letter dated November 20, 1992 from Peak Consulting Services on behalf of C & C Landfarm, Inc. Based on review of these documents and on the current OCD requirements for commercial landfarm facilities, the OCD recommends that the attached conditions be placed on the proposed facility if the Oil Conservation Commission (OCC) deems it appropriate to approve the permit.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

Attachment

xc: Mike Williams, OCD Artesia Office

ATTACHMENT
OCD 711 PERMIT RECOMMENDATIONS
C & C LANDFARM, INC.
(January 6, 1993)

LANDFARM OPERATION

1. Remediation of contaminated soils will occur only on the native ground surface. The caliche pit present on the facility will not be used for the disposal, storage or remediation of any materials without the case-by-case approval of the OCD.
2. No disposal or remediation of contaminated soils will occur within one-hundred (100) feet of your property boundary.
3. Disposal will only occur when an attendant is on duty. The facility will be secured when no attendant is present.
4. The facility will be fenced and have a sign at the entrance. The sign will be legible from at least fifty (50) feet and contain the following information: a) name of the facility, b) location by section, township and range, and c) emergency phone number.
5. An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.
6. All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
7. Soils will be spread on the surface in six inch lifts or less.
8. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
9. Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
10. Only oilfield wastes which are exempt from the RCRA Subtitle C regulations or non-hazardous by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval

(case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt or are non-hazardous by characteristic testing will only be accepted on a case-by-case basis and with prior OCD approval. Comprehensive records of all laboratory analyses and sample locations will be maintained by the operator.

11. Moisture will be added as necessary to enhance bioremediation and to control blowing dust. There will be no ponding, pooling or run-off of water allowed. Any ponding of precipitation will be removed within seventy-two (72) hours of discovery.
12. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers will only be permitted after prior approval from the OCD. Request for application of microbes must include the location of the area designated for the bio-remediation program, composition of additives, and the method, amount and frequency of application.
13. No free liquids or soils with free liquids will be accepted at the facility.
14. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) date received 3) quantity, 4) Exempt or non-exempt status and analysis for hazardous constituents if required, 5) transporter, and 6) exact cell location and any addition of microbes, moisture, fertilizers, etc.
15. The monitor wells will be inspected for the presence of fluids on a quarterly basis on the same schedule as the treatment zone monitoring. If fluids are discovered the OCD will be notified immediately.

TREATMENT ZONE MONITORING

1. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface. The sample will be analyzed for total petroleum hydrocarbons (TPH), general chemistry, and heavy metals using approved EPA methods.
2. A treatment zone not to exceed three (3) feet beneath the land farm will be monitored. A minimum of one random soil sample will be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two to three (2-3) feet below the native ground surface.
3. The soil samples will be analyzed using approved EPA methods for TPH and BTEX quarterly, and for general chemistry and heavy metals annually.
4. After obtaining the soil samples the boreholes will be filled with an impermeable material such as bentonite cement.

REPORTING

1. Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe Office within thirty (30) days of receipt from the laboratory.
2. The OCD will be notified of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

BOND

Pursuant to OCD Rule 711 a surety or cash bond in the amount of \$25,000, in a form approved by the Division, is required prior to commencing construction of the commercial surface disposal facility.

CLOSURE

The operator will notify the Division of cessation of operations. Upon cessation of disposal operations for six (6) consecutive months, the operator will complete cleanup of constructed facilities and restoration of the facility site within the following six (6) months, unless an extension for time is granted by the Director. When the facility is to be closed no new material will be accepted. Existing soils will be remediated until they meet the OCD standards in effect at the time of closure. The area will then be reseeded with natural grasses and allowed to return to its natural state. Closure will be pursuant to all OCD requirements in effect at the time of closure, and any other applicable state and/or federal regulations.



ARDINAL LABORATORIES

PHONE (505) 393-2225 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

July 20, 1992

Mr. Tom Kellahin
Kellahin and Kellahin
P.O. Box 2265
Santa Fe, NM 87504-2265

Dear Mr. Kellahin:

Enclosed please find copies of the analyses of three water samples taken from wells.

These waters show a marked similarity in their chemical and physical properties. The greatest variance is in their sodium concentration, due mainly to differences in the amount of sodium sulfate present. However, calcium, magnesium, chloride, and bicarbonate concentrations are almost identical in all samples. Hardness (CaCO_3) and pH are very close in all samples. There was no iron, carbonate, or hydroxide found in any of the samples.

It appears these three samples have the same source.

We appreciate the opportunity to do this work for you.

Sincerely,

Gayle A. Potter

Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 5
Submitted By: S-W Cattle
Hearing Date: _____



ARDINAL LABORATORIES

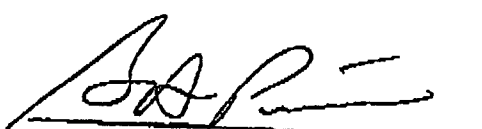
PHONE (505) 323-2228 • 101 E. MAPLAND • HOBBS, NEW MEXICO 88240

CHEMICAL ANALYSIS OF WATER

Company: Kellahin and Kellahin
City, St.: Santa Fe, NM
Proj. Name:
Location:

Lab #: 1421

PARAMETER	RESULT (mg/L)				
	1	2	SAMPLE 3	4	5
SODIUM(Calculated)	1296	328	1666		
CALCIUM	180	140	120		
MAGNESIUM	24	61	49		
IRON	0	0	0		
SULFATE	2850	1100	3700		
CHLORIDE	266	106	177		
CARBONATE	0	0	0		
BICARBONATE	28	24	29		
HYDROXYL	0	0	0		
TDS	4645	1759	5741		
PH	8.5	8.3	8.5		
RESISTIVITY (um/cm)	2.103/cm	4.455/cm	1.614/cm		
HARDNESS AS CaCO3	550	601	500		


Gayle A. Potter

Date: 7/20/92

- 1 NE 1/4 SE 1/4 Sec 9, R20S, T37E
- 2 NW 1/4 SW 1/4 Sec 9, R20S, T37E
- 3 Windmill

Before the
OIL CONSERVATION COMMISSION
Santa Fe, New Mexico
Case No. 10507 Exhibit No. 9
Submitted By: S-W CATTIP
Hearing Date: 2/25/93

GROUND WATER SECTION
Environmental Improvement Division
Health and Environment Department
Santa Fe, N.M. 87503
Phone: (505) 827-2900

Summary of Discharge Plan

May 31, 1990

DP number: 619 Facility name: RHINO TANK AND LINE TESTING
Alternate name:
Type of facility: HYDROCARBON CLEANUP-SOIL DISPOSAL AREA
Means of discharge: LAND APPLICATION

County: LEA EID District 4 T20S, R38E, Sec. 14.122
Location: 8 MILES SOUTH OF HOBBS Nearest city: NADINE

Responsible person: STEVE DYER
Title: OWNER
Address: P.O. BOX 2327
City, zip: HOBBS NM 88240-
Phone: 505-397-1848
Contact or consultant person:

The Ground Water Section staff reviewer is MARK MILLER.
Application was received 04/28/89 and Public Notice published 05/24/89.
The plan was approved 05/07/90 and expires 05/07/95.
(Application for renewal should be submitted in ample time before expiration.)

Monitoring Requirements summary

No. of monitoring reports required annually: 4
Monitoring reports are due no later than May 31, February 28, November 30, and August 31 of each year.

Sampling required	Annual freq.	# of sites	Comments, description
Water levels:	0	0	
Disch. vols:	0	0	SEE ATTACHED MONITORING SUMMARY
Major ions:	0	0	
Heavy metals:	0	0	
N Species:	0	0	
Organics:	0	0	
Other:	0	0	

☒ If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet.
Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.
Send monitoring reports to the address at top, "Attention: MARK MILLER, re: DP-619".

RHINO MONITORING REQUIREMENTS (CONTINUED)

Record Keeping: quarterly reports are due by February 28, May 31, August 31, and November 30 each year.

Record the date, volume, and source of contaminated soils.

Record the dates when soils are tilled. (Soil tilling is required no less frequently than every 10 days.)

Testing Methods: The following test methods must be followed in all soil testing performed to meet the monitoring requirements listed above.

Field Headspace Vapor Method

1. Fill a 16 ounce or larger glass jar half full of soil.
2. Seal top with clean aluminum foil.
3. Ensure sample is at 60 to 80 degrees Fahrenheit.
4. Allow hydrocarbon vapors to develop in jar for 5-10 minutes.
5. Pierce the aluminum foil with the Gastech Model 1238 Hydrocarbon Surveyor probe, and read the peak measurement.
6. A reading of 50 ppm or greater indicates that further remediation is necessary.

Laboratory TPH Method

1. Total Petroleum Hydrocarbon (TPH) samples should be collected in clean glass jars with teflon lined lids as provided by a lab.
2. Samples should be cooled on ice after collection.
3. Samples should be laboratory tested using EPA method 418.1 or equivalent.

RHINO TANK AND LINE TESTING

HYDROCARBON CONTAMINATED SOIL DISPOSAL AREA (DP-619)

MONITORING SCHEDULE

Annual Soil Testing: due by November 30 each year.

4 samples (1 per acre) collected at a depth of 3 feet in the native soil must be tested for headspace vapors and total petroleum hydrocarbons (TPH).

Monitor Well Testing: due by November 30 each year.

The east side monitor well should be inspected annually for the presence of water. If water is present, depth to water must be reported and a sample must be tested for: benzene, toluene, ethylbenzene, xylene, TPH, and total dissolved solids (TDS).

Soil Test Plots: quarterly progress reports due by February 28, May 31, August 31, and November 30 each year.

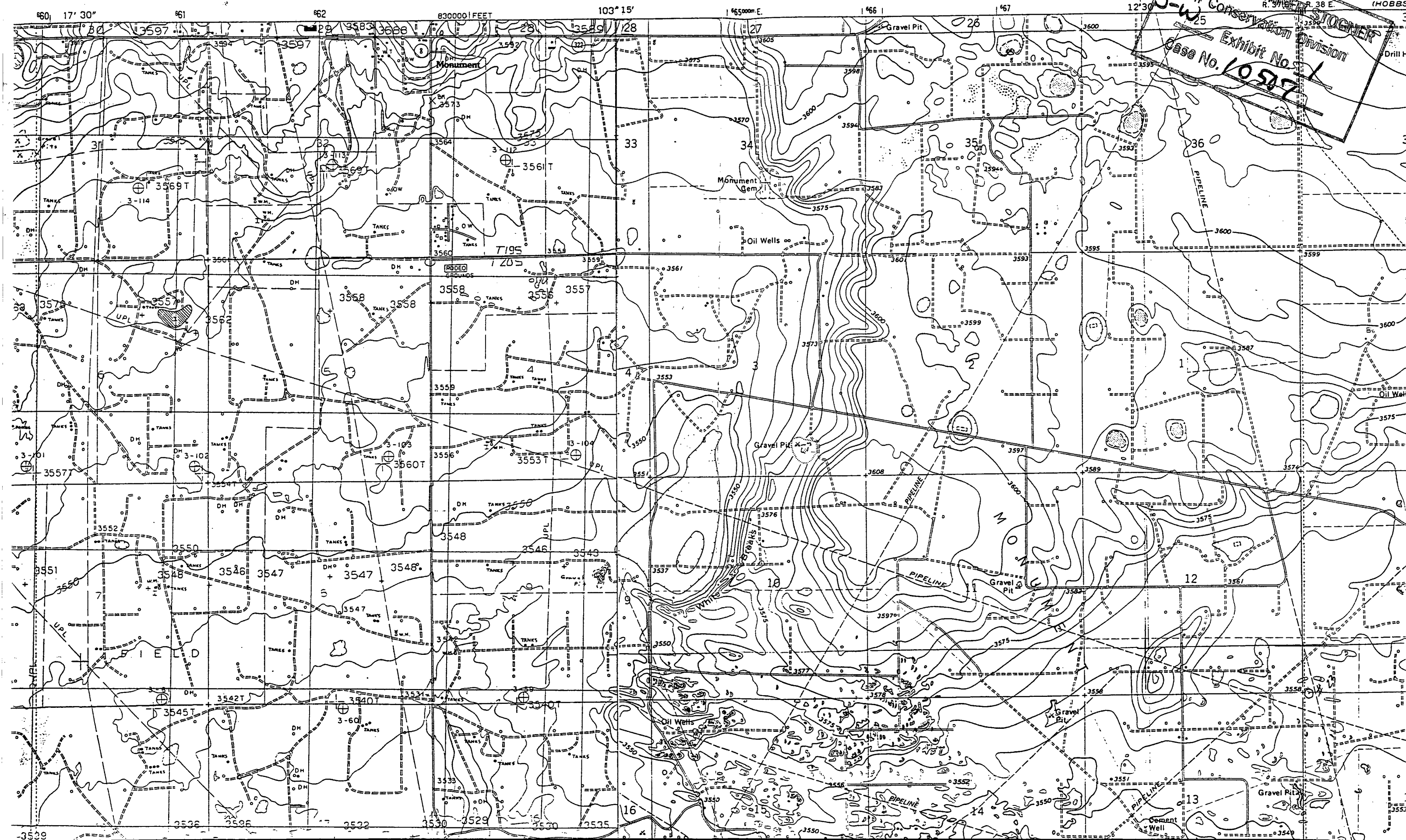
1. Testing must begin no later than August 1990 and the first progress report must be received by August 31, 1990.
2. Two small plots should be kept apart from other soils: one plot of gasoline contaminated soil and one of diesel contaminated soil.
3. A sample from each plot should be initially tested for TPH and headspace vapors.
4. A sample from each plot should be tested at least monthly for headspace vapors.
5. When headspace vapor readings fall below 50 ppm, a final TPH test should be run. If TPH is above 100 ppm. TPH tests should continue until this value is reached.
6. The entire testing procedure should be repeated at least once for both gasoline and diesel contaminated soils to confirm the results.

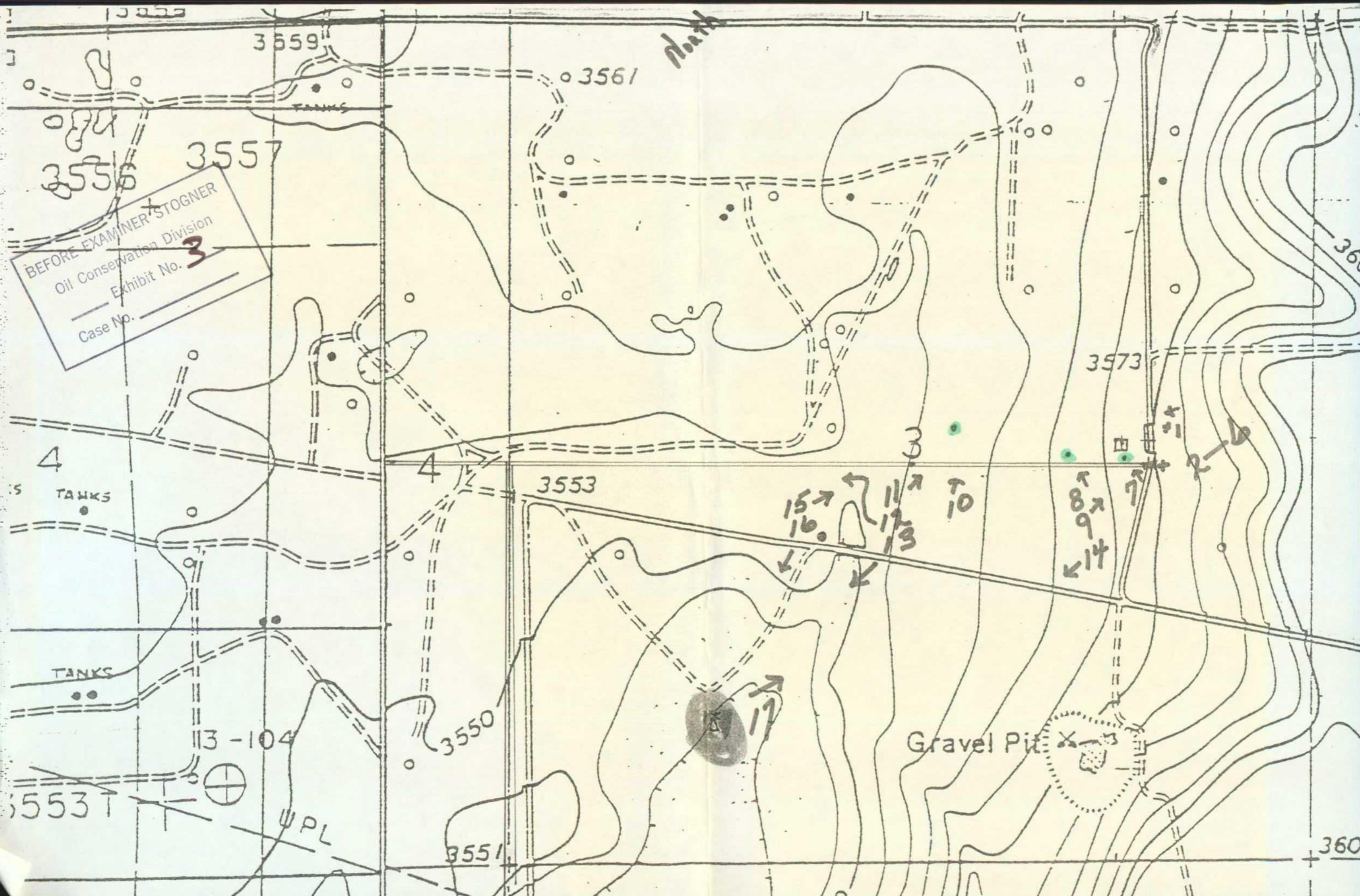
UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY



BEFORE EXAMINER
Oil Conservation
R. 38 E.
3590
Exhibit No.
Case No.

5349
(HOBBS





BEFORE EXAMINER STOGNER
Oil Conservation Division
Exhibit No. 3
Case No. _____

Gravel Pit X

North

TANKS

TANKS

UPL

3-104

5553

3556

3557

3561

3559

3553

3550

3551

3573

360

360

10

15

16

11

12

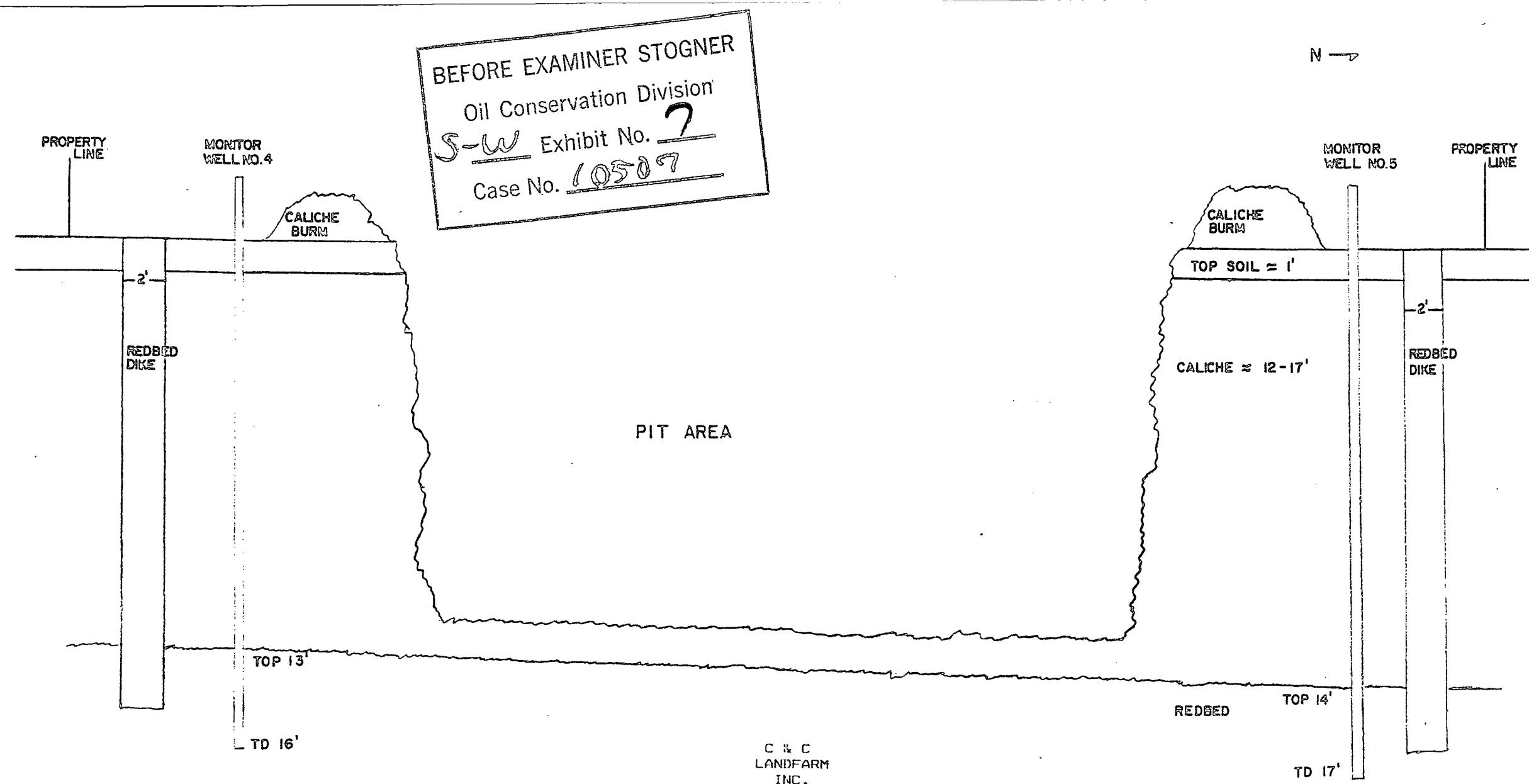
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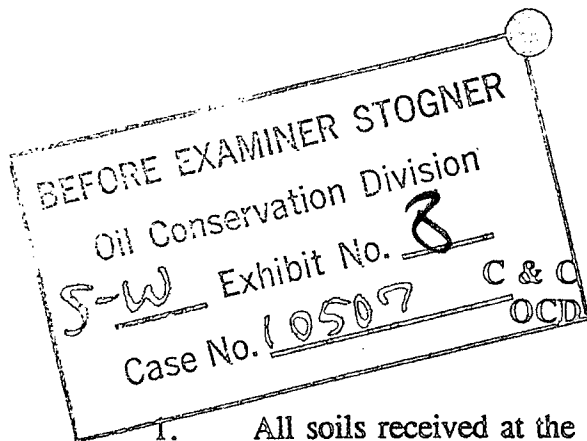
17



NORTH - SOUTH CROSS SECTION OF PIT FACILITY

FIGURE 1

Vertical Scale 1" = 3'
No Horizontal Scale



ATTACHMENT
(May 20, 1992)

C & C LANDFARM INC. APPLICATION
OCD CONDITIONS OF APPROVAL

1. All soils received at the facility will be spread and disked within 72 hours of receipt.
2. Solids will be spread on the surface in six inch lifts or less.
3. Solids will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
4. No solids will be spread on previously spread solids until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 ppm and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
5. Only solids that are non-hazardous by RCRA Subtitle C or by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt will be accepted on a case-by-case basis and with OCD approval.
6. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) analysis for hazardous constituents if required, 3) transporter.
7. OCD approval must be obtained prior to the addition of any substances to enhance biodegradation of the soils landfarmed (ie. chemical additives, manure, nutrients, bugs, ect.).
8. No free liquids or soils with free liquids will be accepted at the facility.
9. If any monitor wells are constructed in the future the drilling and completion plans will be submitted for OCD approval prior to conducting operations.
10. A redbed dike will be installed on the south, west, and north edges of the property as proposed in the C & C correspondence dated March 2, 1992.

State of New Mexico

Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, NM 87501

BEFORE EXAMINER STOGNER

Oil Conservation Division

S-W Exhibit No. 6

Case No. 10507

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

(Refer to DCD Guidelines for assistance in completing the application.)

- I. Type: ☐ Produced Water ☐ Drilling Muds ☐ Treating Fluids
☒ Solids ☐ Other _____
- II. OPERATOR: C & C Landfarm Inc.
 ADDRESS: Box 55 Monument, NM 88265
 CONTACT PERSON: Jimmie T. Cooper PHONE: 505-397-2045
- III. LOCATION: SW /4 NE /4 Section 3 Township 20 Range 37 E
 Submit large scale topographic map showing exact location.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? ☐ Yes ☒ No
- V. Attach the name and address of the landowner of the disposal facility site and landowners of record within one-half mile of the site.
- VI. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VII. Attach detailed engineering designs with diagrams prepared in accordance with Division guidelines for construction/installation of the following: pits or ponds; leak-detection systems; aerations systems; enhance evaporation (spray) systems; waste treating systems and security systems.
- VIII. Attach a contingency plan for reporting and clean-up of spills or releases.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a closure plan.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact free water.
- XII. Attach proof that the notice requirements of OCD Rule 711 have been met. (Commercial facilities only.)
- XIII. Attach a contingency plan in the event of a release of H₂S.
- XIV. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and orders.
- XV. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay Title: Agent/Consultant

Signature: Eddie W. Seay Date: October 4, 1991

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

- I. Type: Solids - Oil or Salt water contaminated soils from production facilities only.
- II. OPERATOR: C & C Landfarm Inc.
ADDRESS: Box 55 Monument, NM 88265
CONTACT PERSON: Jimmie T. Cooper
PHONE: 505-397-2045
- III. LOCATION: SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37 East, Lea Co., NM.
- IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? No, this is a new facility.
- V. LANDOWNER OF FACILITY SITE
Jimmie T. Cooper
P.O. Box 55
Monument, NM 88265
- LANDOWNERS OF RECORD WITHIN 1/2 MILE
State of New Mexico
State Land Office
P.O. Box 1148
Santa Fe, NM 87504
- S & W Cattle Co.
8900 South County Rd. 58
Monument, NM 88265
- J.R. Williams, et al
P.O. Box 215
Monument, NM 88265
- A.C. Doyall
P.O. Box 188
Monument, NM 88265
- VI. DIAGRAM (attached)
- (A) Excavate area as needed down to top of redbed approximately 10 to 12 feet. Use overburden to build burms around site to prevent and restrict rain run off and drainage to facility.
- (B) Fence around all sides, with chain link fence adjacent to County Road 58.
- (C) Gate with cattle guard at entrance. Open during daylight hours only.
- (D) 5 monitor wells on North, South, East, and West sides.
- (E) Signs posted with restrictions and permit no.

Also, any additional rule or regulation at time of closure will be adhered to.

- XI. Geographically, the site is situated near the western boundary of the southern extension of the High Plains in Southeastern New Mexico. The site in question is a 40 acre tract located in Unit G, Section 3, Township 20, Range 37 E, Lea Co., NM.

The site which is bordered by County road 58 on the east, has a gradual surface slope to the west. To the SE of this site in Unit Lettter O is a large pit with the redbed exposed. Redbed is a layer of relatively impermeable clays, red to reddish brown in color, underlying the fresh water aquifer in SE New Mexico ranging in thickness up to 1200 ft.

C & C Landfarm Inc. is located on or near the redbed layer. A series of test wells were drilled to define the redbed and check for fresh water.

TEST WELL LOGS

- #1 Located 100 yds. N of NW corner
0-1 ft. Top Soil
1-18 ft. Caliche, Rock
18-20 ft. Redbed
All formations dry.
- #2 Located 125 ft. N of the south line on the extreme west edge.
0-1 1/2 ft. Top Soil
1 1/2-16 ft. Caliche, Rock
16-18 ft. Redbed
All formations dry.
- #3 Located 100 yds. E of the west line on the south side.
0-1 ft. Top Soil
1-15 ft. Caliche, Rock
15-17 ft. Redbed
All formations dry.
- #4 Located 50 yds. W of the east line on the south border.
0-1 ft. Top Soil
1-13 ft. Caliche, Rock
13-16 ft. Redbed
All formations dry.
- #5 Located 150 yds. W of east line on the north side.
0-1 ft. Top Soil

(F) Any other improvement as needed or required by OCD.

VII. DRAWING OF MONITOR WELL (attached)

Excavate land area down to redbed, dispose of contaminated soil in 6 in. lifts and till or plow every 30 to 60 days as needed to ensure proper aeration so soil can be cleaned up by natural remediation according to government standards. Have soil tested for TPH and BTEX before adding new lift as required.

VII. CONTINGENCY PLAN (NA)

There will be no liquids at facility. Any soil accidentally spilled at facility will be picked up with front end loader and deposited within landfill. No material will be accepted without documentation.

IX. ROUTINE INSPECTION AND MAINTENANCE PLAN

- (1) Weekly inspection of monitor wells.
- (2) Road area around facility will be graded and kept free of oily dirt.
- (3) All loads will be documented and logged.
- (4) No liquids accepted.
- (5) No tank bottoms accepted.
- (6) Area will be posted with proper signs.
- (7) No dumping will be allowed unless facility is open.
- (8) May require letter from company showing waste has not been mixed with non-exempt waste.
- (9) All area properly fenced with locked gates.
- (10) Each lift will be tested for BTEX Method 602 and TPH Method 8015 EPA test requirements before adding new lift.

X. CLOSURE PLAN

All overburden will be removed down to the redbed, averaging from 12 ft. on the east side, to 16 ft. on the west side.

Disposal of solids will start at redbed, when area has been filled and tested to within 1 ft. of surface elevation, area will be backfilled with top soil, mound over and compacted. The mound should prevent rain or water from standing or leaching into backfill.

All fences will be left in tact and monitor wells left in place for future monitoring.

LAKE FARM
10-3-05/14

Also, any additional rule or regulation at time of closure will be adhered to.

- XI. Geographically, the site is situated near the western boundary of the southern extension of the High Plains in Southeastern New Mexico. The site in question is a 40 acre tract located in Unit G, Section 3, Township 20, Range 37 E, Lea Co., NM.

The site which is bordered by County road 58 on the east, has a gradual surface slope to the west. To the SE of this site in Unit Lettter O is a large pit with the redbed exposed. Redbed is a layer of relatively impermeable clays, red to reddish brown in color, underlying the fresh water aquifer in SE New Mexico ranging in thickness up to 1200 ft.

C & C Landfarm Inc. is located on or near the redbed layer. A series of test wells were drilled to define the redbed and check for fresh water.

TEST WELL LOGS

- #1 Located 100 yds. N of NW corner
0-1 ft. Top Soil
1-18 ft. Caliche, Rock
18-20 ft. Redbed
All formations dry.
- #2 Located 125 ft. N of the south line on the extreme west edge.
0-1 1/2 ft. Top Soil
1 1/2-16 ft. Caliche, Rock
16-18 ft. Redbed
All formations dry.
- #3 Located 100 yds. E of the west line on the south side.
0-1 ft. Top Soil
1-15 ft. Caliche, Rock
15-17 ft. Redbed
All formations dry.
- #4 Located 50 yds. W of the east line on the south border.
0-1 ft. Top Soil
1-13 ft. Caliche, Rock
13-16 ft. Redbed
All formations dry.
- #5 Located 150 yds. W of east line on the north side.
0-1 ft. Top Soil

1-14 ft. Caliche, Rock
14-17 ft. Redbed
All formations dry.

- * An area in the middle of the east edge of the property, was excavated with a backhow. Rock and caliche at 0-12 ft. Redbed was encountered at 12 ft.

The wells were drilled with rotary rig, no water was encountered, only caliche, rock, and sand down to redbed. The redbeds came in at 12 ft. on the east side, down to 17 ft. on the west side. The five wells drilled were completed into the redbed and cased with 3 in. PVC pipe with 5 ft. of screen on bottom with the top 2 ft. cemented and capped. Wells to be secured with locks and used as monitor wells.

Researched State Engineers records and U.S.G.S. file, no fresh water was recorded or found within area of review. A physical inspection was made and a windmill was found approximately 1 mile SW of the site, a sample was taken and analysis recorded for future use.

We feel this is one of the better sites for deposit of contaminated soil due to the thickness of redbeds, little or no fresh water in the area, a monitor system is in place for control of system. This system is in the middle of the oil and gas production and will serve a valuable environmental need, both regulatory and industrial.

- XII. PROOF OF OCD RULE 711 (attached)
- XIII. CONTINGENCY PLAN FOR RELEASE OF H₂S (NA)

Open pit system should not have H₂S. If encountered, OCD Rule 118 will be adhered to.

- XIV. All State of New Mexico, Oil Conservation rules will be enforced as they pertain to this system.

C & C LANDFARM INC.

Additional information to Application for Surface Waste Disposal.

REGIONAL DIVISION
ECL 750

- I. The thickness of the redbeds varied from area to area in Section 3. The information was taken from logs of producing oil wells in the area and lithology reports. MAY 9 31

Unit C	Top 20 ft.	Base 960 ft.
F	30 ft.	562 ft.
B	14 ft.	880 ft.
H	15 ft.	1350 ft.
M	30 ft.	1270 ft.
L	40 ft.	1050 ft.

with the average thickness being 987 ft.

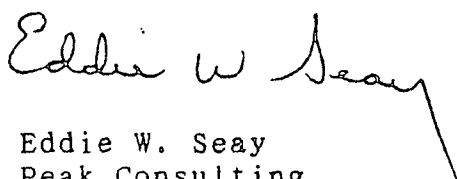
- II. Groundwater in the area; Figure I is a copy of the State Engineer's water analysis and locations for this area, none were listed in Sect. 3. The windmill SSW of our proposed site appears to be located in Unit M of Sect. 3 approximately 3/4 mile from site; Figure II is a copy of analysis from S & W windmill. Figure III indicates water wells in the general area showing top and bottom of water formation and contour line indicating direction of flow, which is SE. Figure IV is a contour map of top of redbed, with slopes to the SSE. Figure V is a contour map of the surface for the surrounding area, the direction of slope is to the west.

The contour maps provided are information from the State Bureau of Mines, which shows any movement at our site would run SE along the redbed surface and west along the top of ground.

If the State feels it is necessary, additional monitor wells can be installed or a redbed barrier constructed on the SW portion of our site to prevent any contaminate from moving.

- III. Also provided are the mail receipts from registered letters.

Any additional information needed, please call (505)392-2236.



Eddie W. Seay
Peak Consulting

State Coll.

List of Water
Wells in the area
None listed in
Sheet 3

	LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF	
2	20S 36E 09 13440	10/12/84	434	2350	63F	T06	
4							
5	20S 36E 10 32114	08/28/72	79	520		QAL	
6	20S 36E 10 32114	11/01/76	66	889	66F	QAL	
7	20S 36E 10 32114	10/19/79	68	880	66F	QAL	
8	20S 36E 10 32114	10/12/84	92	980	64F	QAL	
9							
10	20S 36E 11 42243	08/28/72	1000	1450		QAL	L
11	20S 36E 11 42243	11/01/76	918	3969	63F	QAL	L
12	20S 36E 11 42243	10/19/79	1074	4569	65F	QAL	L
13	20S 36E 11 42243	10/12/84	840	4330	64F	QAL	L
14							
15	20S 36E 15 242421	08/28/72	720	1800		QAL	L
16	20S 36E 15 242421	11/01/76	518	3223		QAL	L
17	20S 36E 15 242421	10/12/84	882	3630	63F	QAL	L
18	20S 36E 15 242421	5/07/86	884	3715	70F	QAL	L
19							
20	20S 36E 15 24342	03/30/54	1080	6780		T06	L
21	20S 36E 15 24342	09/09/58	1240	7500		T06	L
22							
23	20S 36E 15 24342A	08/28/72	1280	2900		TRC	L 06986
24	20S 36E 15 24342A	11/01/76	1192	6988	70F	TRC	L
25							
26	20S 36E 26 24344	11/08/79	150	1790		T06	L
27	20S 36E 26 24344	2/08/85	150	1798	68F	T06	L
28							
29	20S 36E 26 24443	11/08/79	182	1895		T06	L
30							
31	20S 36E 35 24444	11/08/79	118	1541		T06	L
32							
33	20S 37E 04 11114	04/02/54	450	2180		QAL	L
34	20S 37E 04 11114	04/22/55	425	2090		QAL	L
35	20S 37E 04 11114	09/09/58	325	1670		QAL	L
36							
37	20S 37E 04 221321	04/22/55	51	758		QAL	L
38	20S 37E 04 221321	09/09/58	47	708		QAL	L
39	20S 37E 04 221321	07/14/77	106	1070		QAL	L
40	20S 37E 04 221321	10/25/79	214	1506	65F	QAL	L
41	20S 37E 04 221321	2/06/85	81	964		QAL	L
42							
43	20S 37E 05 222144	11/29/79	258	1611		T06	L
44	20S 37E 05 222144	9/26/84	314	1729		T06	L
45							
46	20S 37E 07 24331	11/09/79	1268	4232		T06	L
47	20S 37E 07 24331	2/13/85	2680	8160	68F	T06	L
48							
49	20S 37E 08 244124	11/29/79	868	3734	57F	T06	L 07620 ES
50							
51	20S 37E 08 423223	10/25/79	520	2396	66F	T06	L
52	20S 37E 08 423223	9/26/84	886	3806		T06	L
53							
54							
55							
56							
57							

WATER ANALYSIS REPORT

Company : S & W CATTLE CO
 Address : HOBBS, NEW MEXICO
 Lease : SECT 3 T20 R37
 Well : UNIT M
 Sample Pt. : WINDMILL

Date : 10/29/91
 Date Sampled : 10/28/91
 Analysis No. : 876

ANALYSIS		mg/L		* meq/L
-----		----		-----
1. pH	7.1			
2. H ₂ S	NEGATIVE			
3. Specific Gravity	1.000			
4. Total Dissolved Solids		2245.2		
5. Suspended Solids				
6. Dissolved Oxygen				
7. Dissolved CO ₂				
8. Oil In Water				
9. Phenolphthalein Alkalinity (CaCO ₃)				
10. Methyl Orange Alkalinity (CaCO ₃)		291.0		
11. Bicarbonate	HCO ₃	355.0	HCO ₃	5.8
12. Chloride	Cl	599.1	Cl	16.9
13. Sulfate	SO ₄	575.0	SO ₄	12.0
14. Calcium	Ca	153.5	Ca	7.7
15. Magnesium	Mg	66.1	Mg	5.4
16. Sodium (calculated)	Na	496.4	Na	21.6
17. Iron	Fe	0.0		
18. Barium	Ba	0.0		
19. Strontium	Sr	0.0		
20. Total Hardness (CaCO ₃)		655.6		

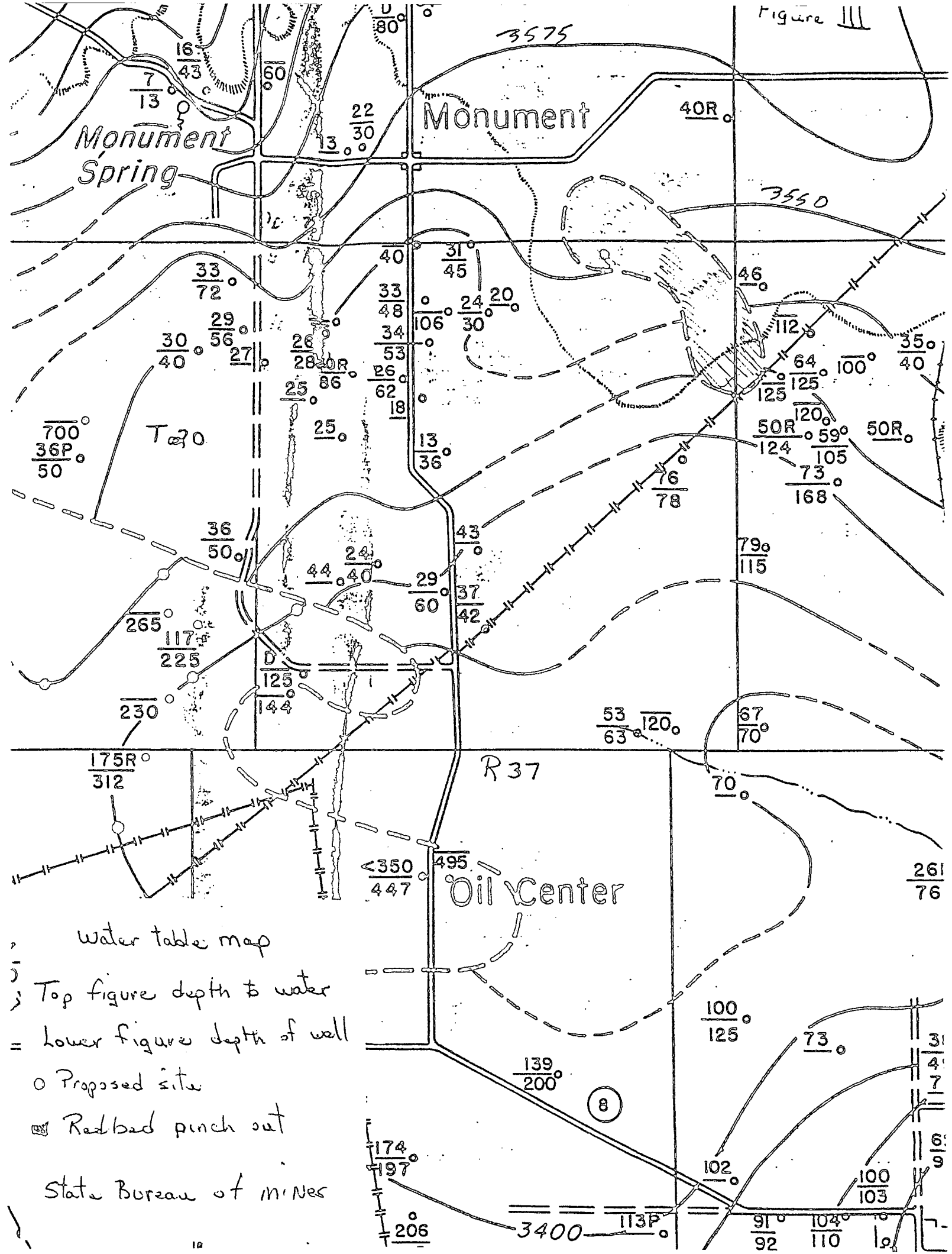
PROBABLE MINERAL COMPOSITION

*milli equivalents per Liter		Compound	Equiv wt X meq/L	= mg/l
-----		-----	-----	-----
8 *Ca <----- *HCO ₃	6	Ca(HCO ₃) ₂	81.0	5.8 472
----- /----->	-----	CaSO ₄	68.1	1.8 125
5 *Mg -----> *SO ₄	12	CaCl ₂	55.5	
----- <----- /	-----	Mg(HCO ₃) ₂	73.2	
22 *Na -----> *Cl	17	MgSO ₄	60.2	5.4 327
-----	-----	MgCl ₂	47.6	
Saturation Values Dist. Water 20 C		NaHCO ₃	84.0	
CaCO ₃ 13 mg/L		Na ₂ SO ₄	71.0	4.7 333
CaSO ₄ * 2H ₂ O 2090 mg/L		NaCl	58.4	16.9 988
BaSO ₄ 2.4 mg/L				

REMARKS: EDDIE SEAY

Petrolite Oilfield Chemicals Group

Respectfully submitted,
 ROZANNE JOHNSON



water table map

Top figure depth to water
 = Lower figure depth of well

○ Proposed site

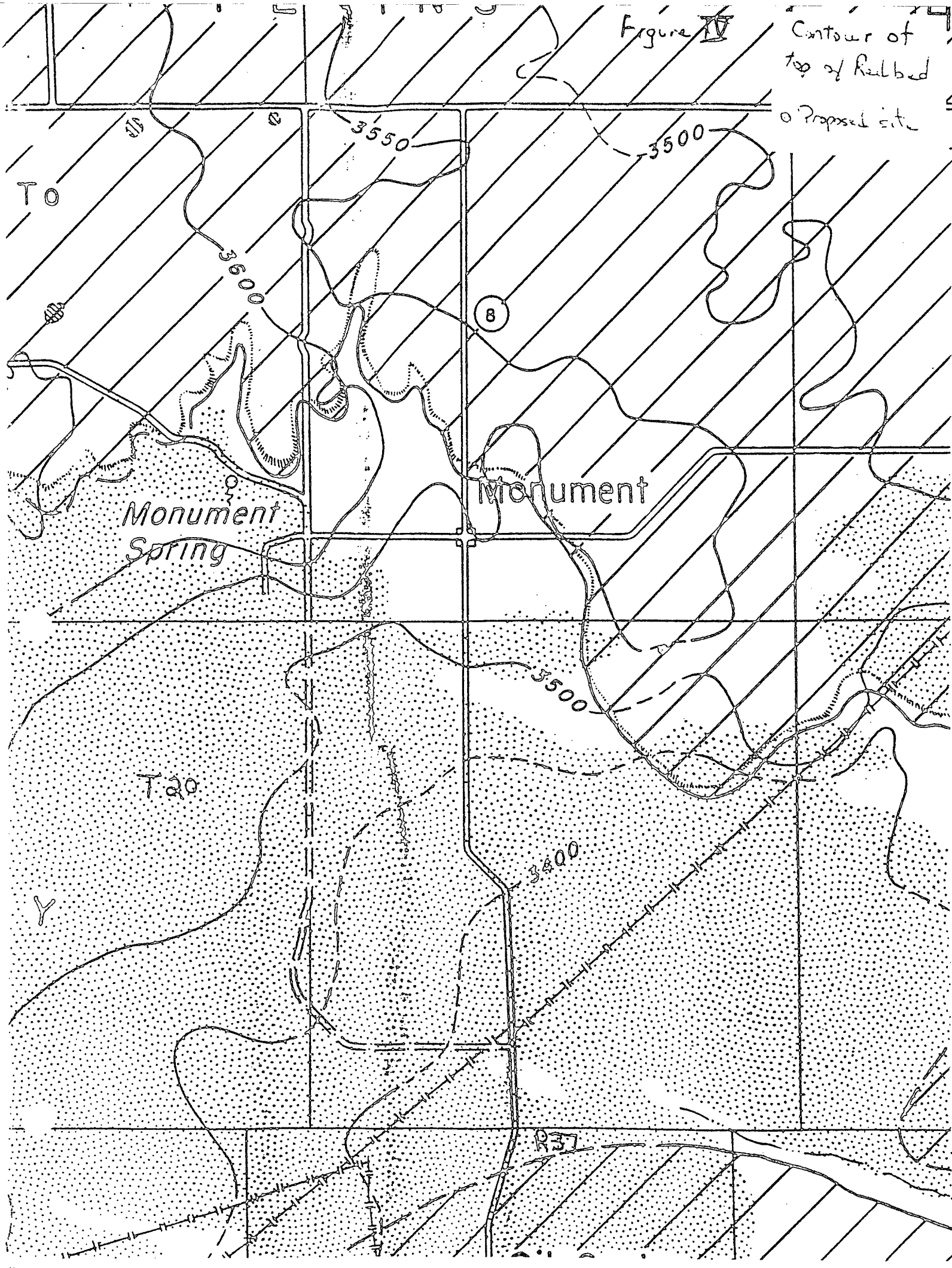
Redbed pinch out

State Bureau of Mines

Figure IV

Contour of
top of Redbed

o Proposed site



Surface
contour
map

o Proposed
S.T.

Monument

31

1095

MONUMENT JAIL

6

1

1084° Well

Pipelino

White Breaks

OIL FIELD

1075

Gravel

1075

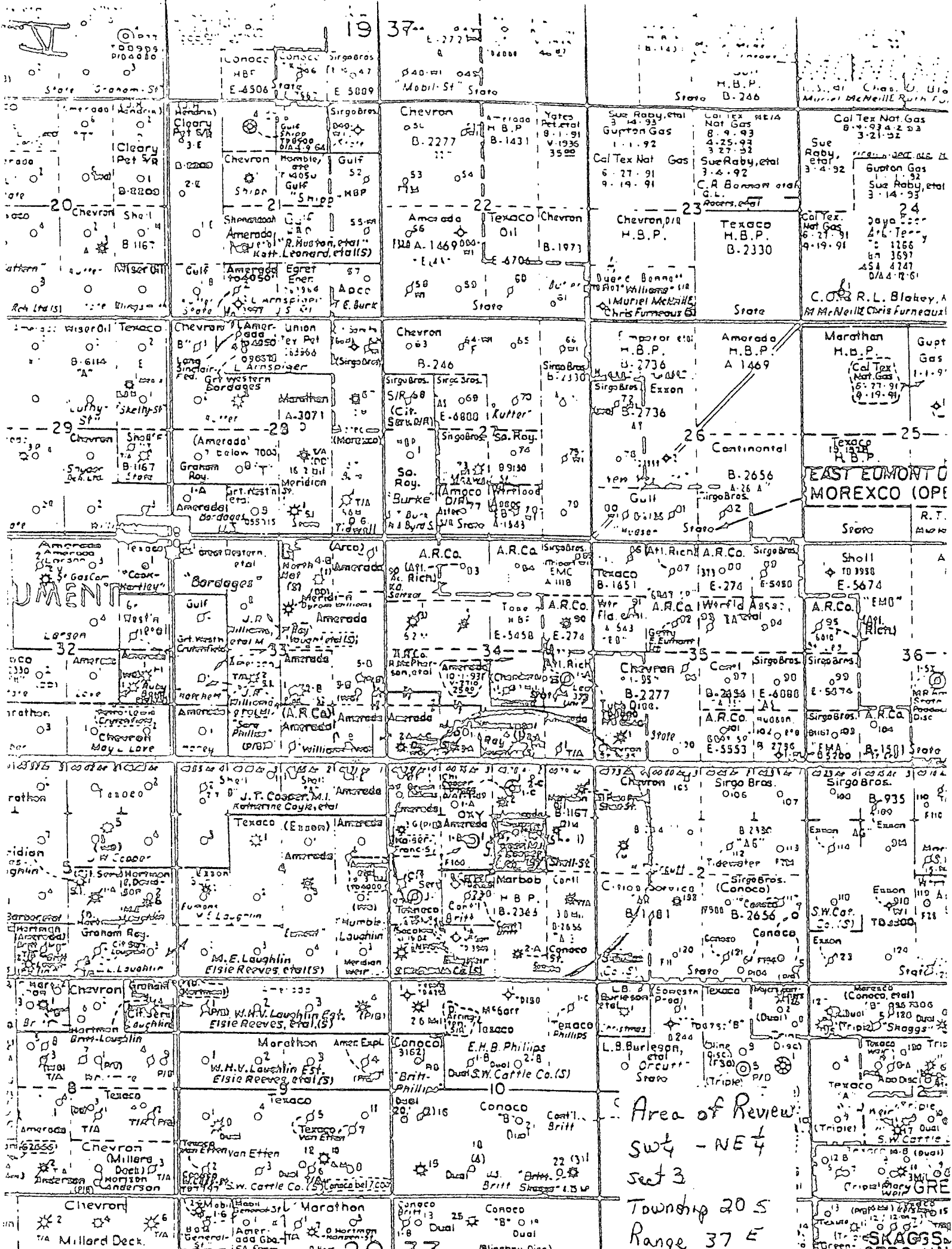
Well

1036

Pipeline

31

Well

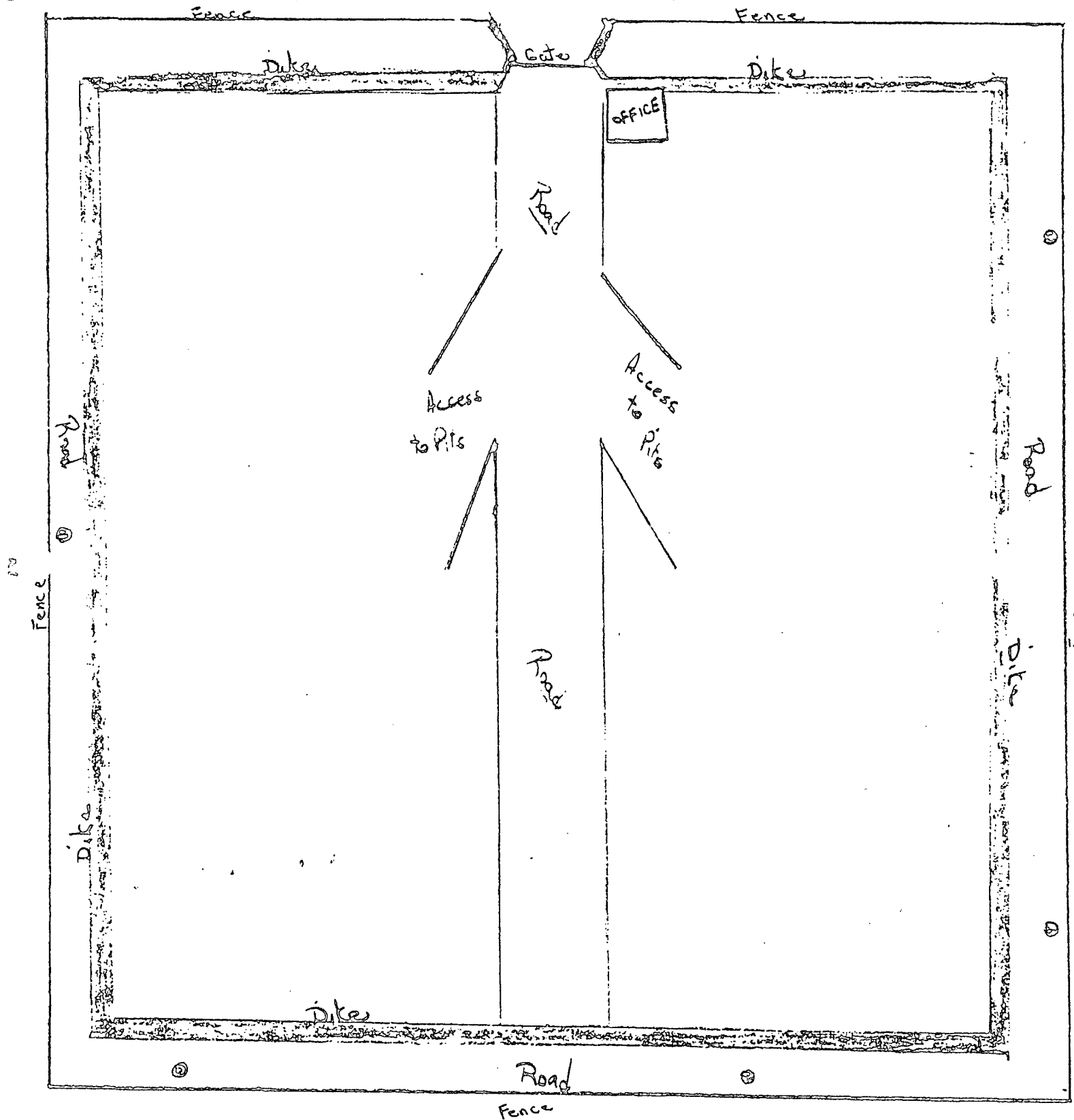


Area of Review:
SW 1/4 - NE 1/4
sect 3
Township 20 S
Range 37 E

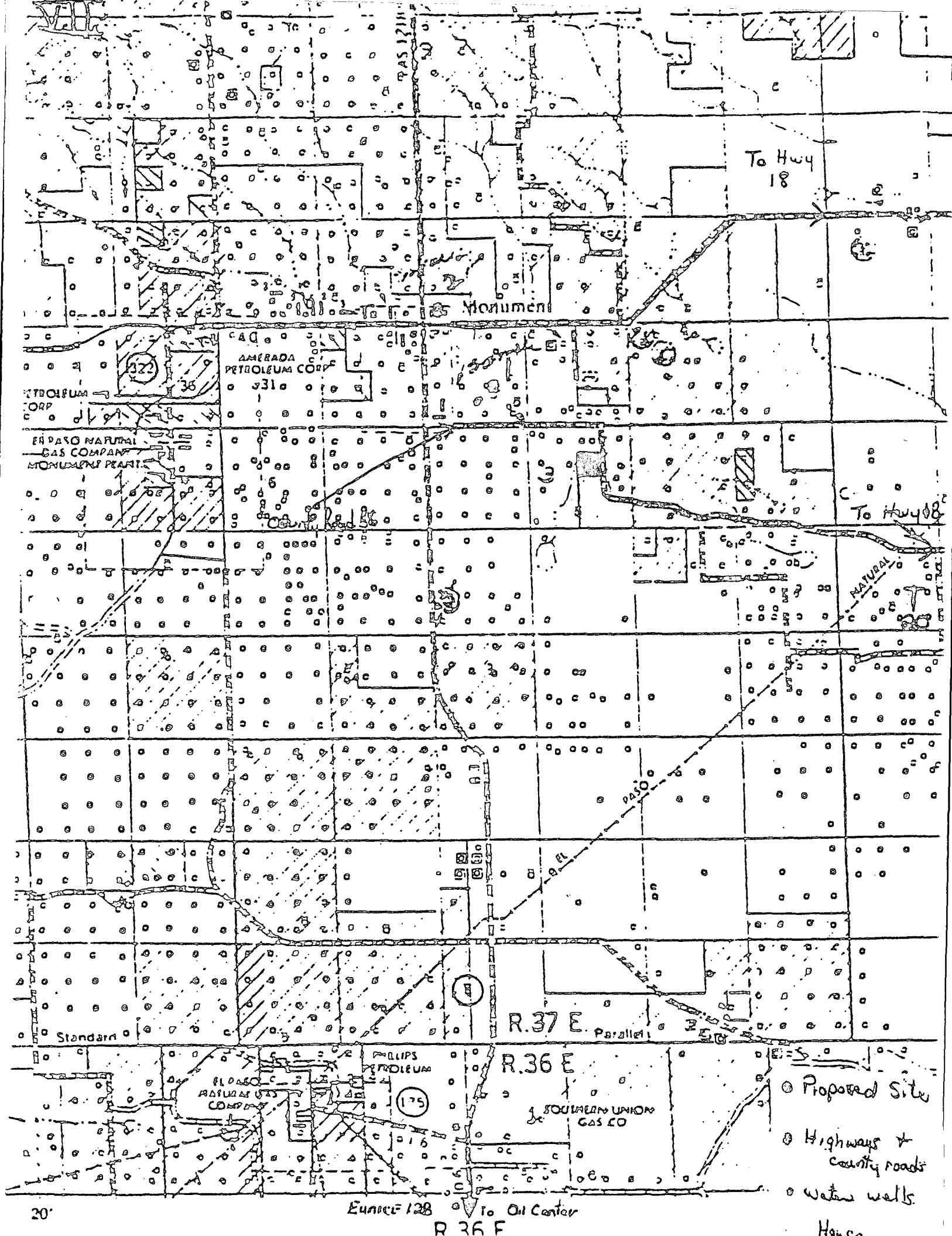
SKAGGS
GRE

VI

County Road 58 "Billy Walker Road"

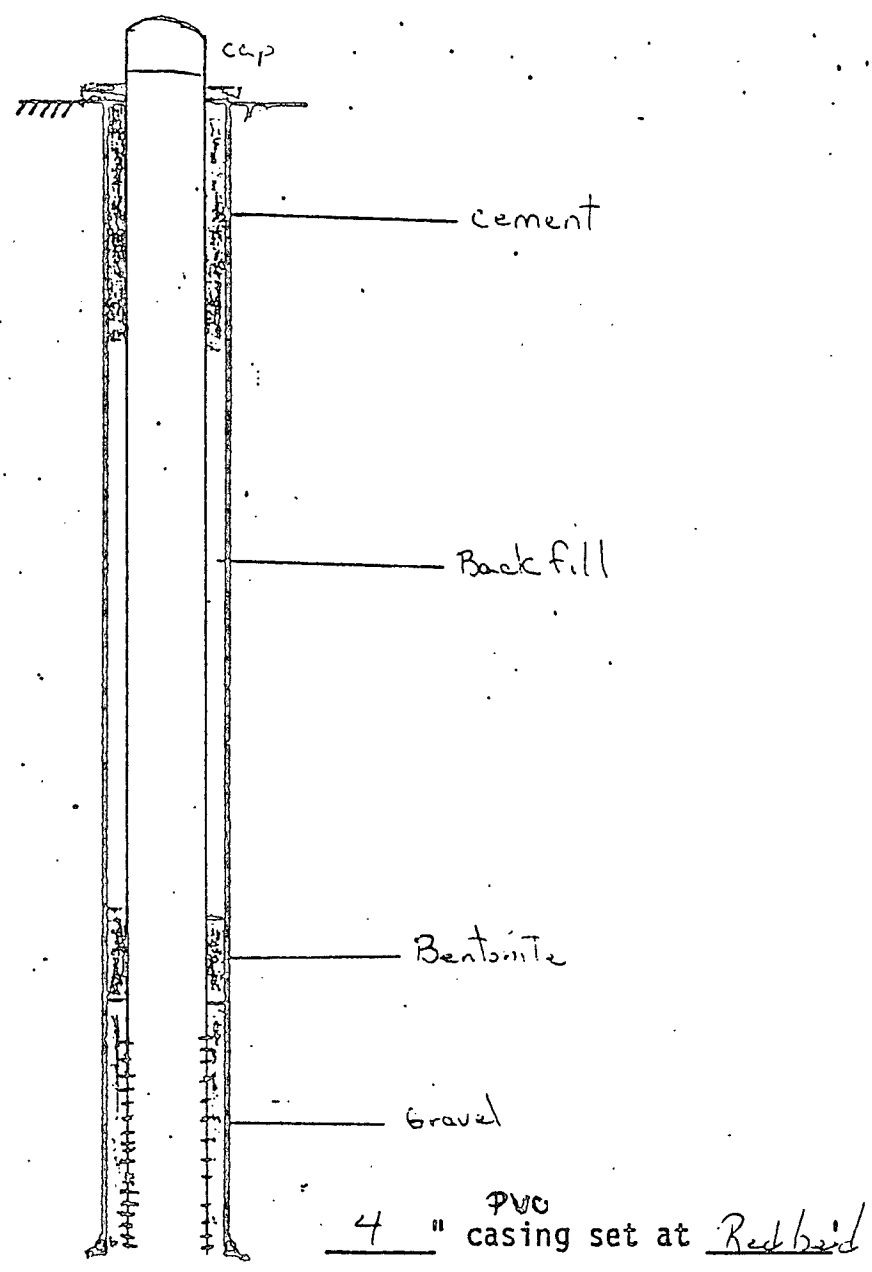


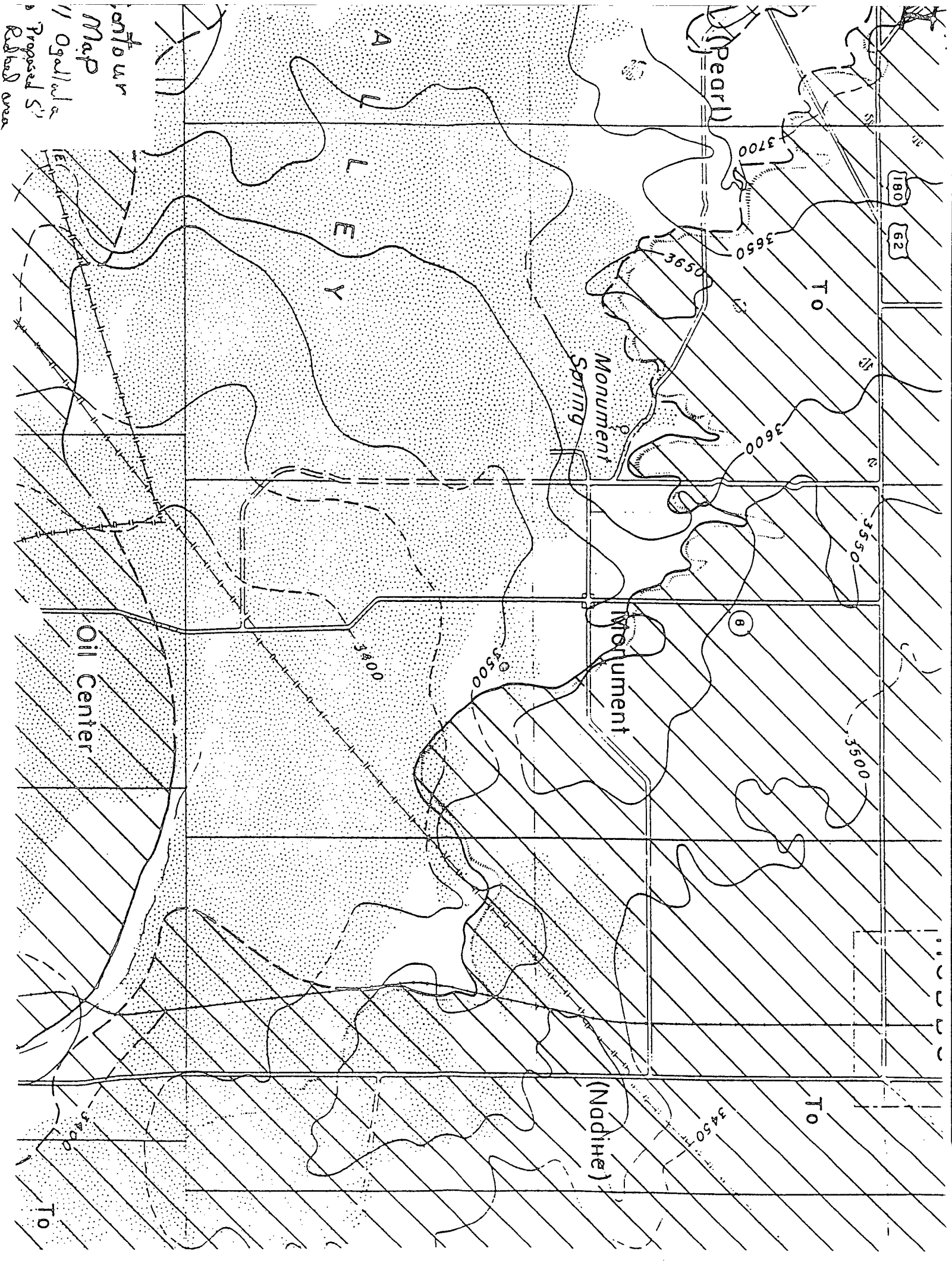
- ① Monitor wells
- ② Burns or Dyke
- ③ Disposal Area



S-11

Test well - Monitor well





contour
Map
Ogallala
Proposed S
Railroad area

P 661 750 233

Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to	
S & W Cattle Co.	
Street & No.	
8900 S. County Rd. 58	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

P 661 750 234

Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to	
Mr. Jimmie T. Cooper	
Street & No.	
Box 55	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

P 661 750 230

Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to	
Mr. A.C. Doyall	
Street & No.	
P.O. Box 188	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

P 661 750 231

Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to	
Commissioner of Public Lands	
Street & No.	
P.O. Box 1148	
P.O., State & ZIP Code	
Santa Fe, NM 87504	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

P 661 750 232

Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Sent to	
J.R. Williams, et al	
Street & No.	
P.O. Box 215	
P.O., State & ZIP Code	
Monument, NM 88265	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

XII

C & C Landfarm Inc.
Jimmie T. Cooper P.O. Box 55 Monument, NM 88265
505-397-2045

October 1, 1991

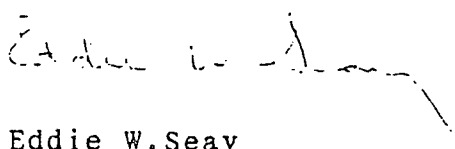
Dear Sir:

Pursuant to Rule 711 of the Oil Conservation Commission, State of New Mexico, notice is hereby given that Jimmie T. Cooper, owner and operator of C & C Landfarm Inc., will be filing an application for a surface waste disposal facility located at SW 1/4 of the NE 1/4 of Section 3, Township 20, Range 37E, Lea Co., NM on deeded land. The facility will be for the disposal of contaminated soils only from oil and gas production. No produced waters or tank bottoms will be allowed. This disposal will allow a safe place for the natural occurrence of remediation of the soil.

If there are any questions please contact:

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501
505-827-5884

Thank You.


Eddie W. Seay
Peak Consulting Service

☐ **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. ☐ 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Apollo Realty ATTN: J. Williams P.O. Box 75285 Albuquerque, NM 87194-0285		4. Article Number: P 661 750 228	
5. Signature of Addressee: <i>[Signature]</i>		Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature of Agent: <i>[Signature]</i>		Always obtain signature of addressee of agent and DATE DELIVERED.	
7. Date of Delivery: 10-15-81		8. Addressee's Address (ONLY if requested and fee paid)	

PS Form 3811, Apr. 1989

* U.S.G.P.O. 1989-239-015

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: **S & W Cattle Co.**
P.O. Box 1799
Hobbs, NM 88240

4. Article Number **P 661 750 229**

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee ☒ X

6. Signature - Agent ☒ X *L. R. Doyall*

7. Date of Delivery *7-9-91*

PS Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: **Mr. A.C. Doyall**
P.O. Box 188
Monument, NM 88265

4. Article Number **P 661 750 230**

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee ☒ X *L. R. Doyall*

6. Signature - Agent ☒ X

7. Date of Delivery *7-9-91*

PS Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: **Mr. Jimmie T. Cooper**
P.O. Box 55
Monument, NM 88265

4. Article Number **P 661 750 234**

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee ☒ X *Jimmie T. Cooper*

6. Signature - Agent ☒ X

7. Date of Delivery *7-9-91*

PS Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: **Commissioner of Public Lands**
State of New Mexico
NM State Land Office
P.O. Box 1148
Santa Fe, NM 87504

4. Article Number **P 661 750 231**

Type of Service:
☐ Registered
☒ Certified
☐ Express Mail
☐ Insured
☐ COD
☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

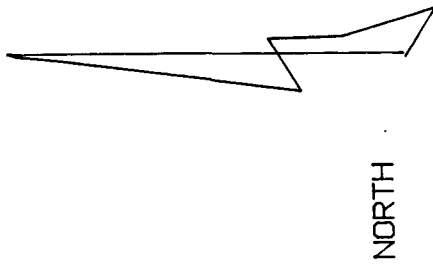
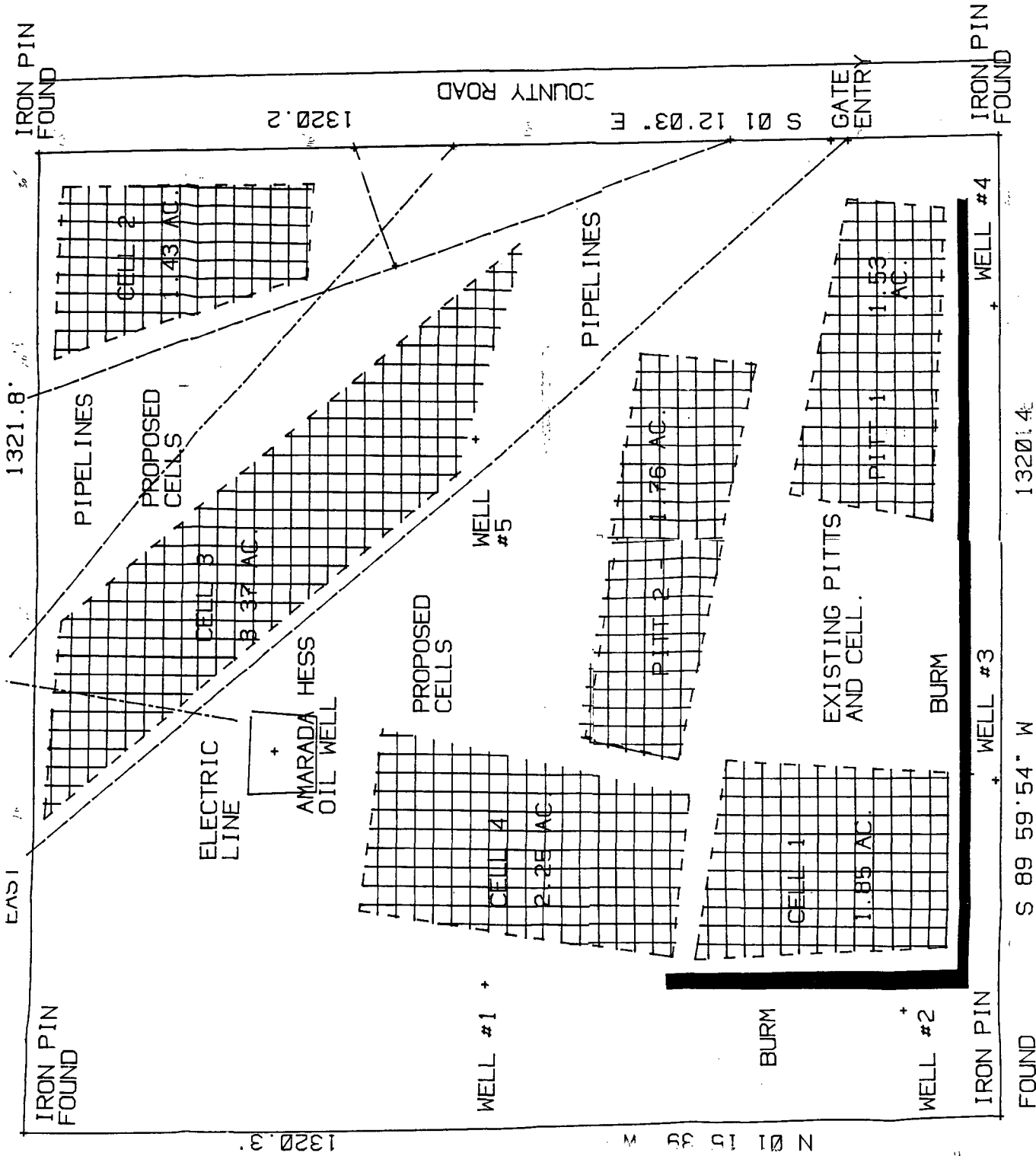
5. Signature - Addressee ☒ X *[Signature]*

6. Signature - Agent ☒ X

7. Date of Delivery *7-9-91*

PS Form 3811, Apr. 1989 * U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT



SURVEY OF THE SURFACE OF
SW 1/4 NE 1/4, SECTION
T-20-S, R-37-E, N.M.P.M.
LEA COUNTY, NEW MEXICO.

I, TRUMAN GASKIN, DO HEREBY CERTIFY THAT THIS PLAT REPRESENTS A
SURVEY MADE ON THE GROUND, UNDER MY SUPERVISION ON THIS 10
DAY OF SEPTEMBER, 1982 AND IS TO THE BEST OF MY KNOWLEDGE TRUE AND
CORRECT.

Truman Gaskin
TRUMAN GASKIN, REGISTERED PUBLIC SURVEYOR, NEW MEXICO No. 2128

BEFORE THE
OIL CONSERVATION COMMISSION
State of New Mexico
Case No. 20307-Sub. 4
Submitted by *C. McCammon, Inc.*

INES