NM1 - 2

GENERAL CORRESPONDENCE

YEAR(S): 9/2003 -> /988



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 17, 2003

Mr. Frates Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

Re:

Case No. 13167

Application of the New Mexico Oil Conservation Division through the Environmental Bureau Chief to Revoke the Permit of A.L. Daugherty to Operate an Oil Treatment Plant and Disposal Facility and to Release Bond; Chaves County, New Mexico.

Dear Mr. Seeligson;

By letter dated August 8, 2003, the Division notified you that it intended to revoke the permit for the Daugherty-Crosby Salt Lake Treating Plant and Disposal Facility at Section 19, T8 S, R 30 E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM, in Chaves County, New Mexico, if it did not receive a request from you to keep the permit. The Division did not receive such a request. Therefore, the Division is proceeding with a permit revocation hearing.

A hearing will be conducted by a Division hearing examiner in Porter Hall, first floor, 1220 South St. Francis Drive, Santa Fe, New Mexico, at 8:15 a.m. on Thursday, October 9, 2003. At that hearing, you will have an opportunity to oppose the revocation of the permit.

If you have any questions, please do not hesitate to call me at (505) 476-3451.

Very truly yours,

Gail MacQuesten Assistant General Counsel

ec: Martyne Kieling



NEW MIXICO ENERGY, MINURALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor
Joanna Prukop
Cabinet Secretary

August 8, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

VIA CERTIFIED MAIL 7001-1904-0004-3929-9918

Re: Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility

Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E;

and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Permitted by Order No. R-5464 issued in Case No. 5922, under date of June 14,

1977.

Dear Mr. Seeligson:

The Oil Conservation Division (OCD) has determined that disposal operations have ceased at the referenced facility. Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility submitted a closure plan that was approved by the OCD on January 31, 2003. Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility submitted a closure reports dated June 1, 2003. The closure of the facility was approved by the OCD on August 8, 2003.

In the absence of a response to this letter, the Division will proceed with an application for a hearing to show cause why the permit for this facility should not be revoked. You posted a surety bond, in the amount of \$25,000, No. 111 3268 3654 issued by Fireman's Fund Insurance Co. on Apirl 10, 1989. Upon revocation of the permit this Bond will be released.

Unless the permitee submits to this office, no later than August 29, 2003 a request to keep the permit, the Division will proceed to schedule a permit revocation hearing.

Should you have any questions, please call Martyne Kieling at (505)-476-3488.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

ec: David K. Brooks, OCD legal

OCD Hobbs Arksis

New Mexico Office of the State Engineer Well Reports and Downloads

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor Joanna Prukop Cabinet Secretary

August 8, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

RE:

CLOSURE

Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility

Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E;

and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Dear Mr. Seeligson:

The New Mexico Oil Conservation Division (OCD) is in receipt Safety & Environmental Solutions, Inc. closure report dated June 1, 2003, for the Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility at the above-referenced location. Based on the closure report and the May 28, 2003 and August 6, 2003 OCD inspection, the OCD has determined that the Daughtery - Crosby Salt Lake treating plant has been remediated to OCD standards and the site has been restored to prevent erosion. The OCD hereby approves of the closure of Daughtery - Crosby Salt Lake treating plant.

Please be advised that OCD approval does not relieve Daughtery - Crosby Salt Lake of liability should any remaining contaminants result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve Daughtery - Crosby Salt Lake of the responsibility for compliance with other federal, state, or local laws and/or regulations.

If you have any questions please contact Martyne J. Kieling at 505-476-3488.

Sincerely,

Roger C. Anderson

Environmenal Bureau Chief

xc:

Artesia OCD

Bob Allen, Safety & Environmental Solutions, Inc., 703 E. Clinton, Suite 102, Hobbs, NM 88240

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

MEMORANDUM OF MEETING OR CONVERSATION

Telephone Personal Time 3:15 Date 8-6-03	
Originating Party Mike Stubble Sield OCD Artesia Distrit office Ocher Parties Martyne Kieling Environnment Bureau	
Subject Daughtung Treating Plant. Mike Performed a final inspechi of the Treatment Arm, Lane area, and Disposal Pit Area. Inspection Acquest 6, 2003	DŊ
Discussion There is No Morterial Coming to the Sprince at the Disposal Pit Area. The lake Area Shows Just on little Contaminated Markey that is mobile in the Heart of the day. Report Suys 982 of the Lake markey was Removed. This is way Accorded Looks Goods	
The Pipelike & Spill Area Alengthe Slope Looks to be in great Shape even with the Rains that they Have Had. Much of the Hard Asphalteens Have been Brokn up and there with the Cross Slope Grading & Riping. The treatment Area Look Good ALSO	
Conclusions or Agreements Closur is Approved From the District. Lovel - J. will Proceede Writing the Closur Approved. and then Request that The DRDER Be Relessed.	
Distribution Signed May Kel,	

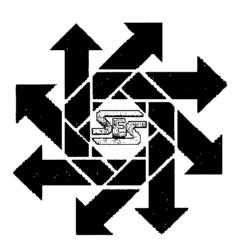
RECEIVED

JUN 0 9 2003

Environmental Bureau
Oil Conservation Division

Daughtery – Crosby Salt Lake
Treating Plant and Disposal Facility
Closure Report
Section 19, Township 8S, Range 30E
Section 24, Township 8S, Range 30E
Section 19, Township 8S, Range 29E
Chaves County, New Mexico

June 1, 2003



Prepared for:

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, Texas 78209

By:

Safety & Environmental Solutions, Inc. 703 E. Clinton Suite 103 Hobbs, New Mexico 88240 (505) 397-0510

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	Appendix A – Analytical Results	
	Appendix B – Site Photos	

I. Background

Safety & Environmental Solutions, Inc. (SESI) was contracted by Frates Seeligson to perform assessment and cleanup services on the area identified as the Daughtery – Crosby Salt Lake Treating Plant and Disposal Facility in the letter from the New Mexico Oil Conservation Division (NMOCD) to Mr. Frates S. Seeligson dated October 22, 2002. The subject area is located in Section 19, Township 8S, Range 30E, Section 24, Township 8S, Range 30E, and Section 19, Township 8S, Range 29E, in Chaves County, New Mexico. The site is situated on the White Lake Ranch privately owned by Mr. Kent Gable. The site was an NMOCD approved treating and reclaiming facility operated from the late 1970s to the late 1980s. The site is currently abandoned.

II. Contaminant and Size of Leak

The suspected contaminant is crude oil and produced water associated with the treating and reclaiming facility. The crude oil and produced water is considered exempt oilfield waste. No evidence of other contaminants was observed.

III. Surface and Ground Water

There is no protectable groundwater in the area according to the database provided by the New Mexico State Engineer's Office.

IV. Soils

The soils in the area are predominantly sand and sandy loam.

V. Work Performed

The above referenced letter required that the following areas be addressed at the subject site: Process Area, Flow Lines, Above Ground Tanks, Crosby Salt Lake and Area between Process Area and Crosby Lake.

The closure of each area is detailed below.

Process Area

Surface contamination in the form of "hardpan" or well-degraded hydrocarbons was present in the process area. There was no evidence of contamination that would migrate either vertically or horizontally from that area. The hardpan was disced in place and broken into small pieces, which will hasten natural attenuation in the area.

Flow Lines

All flowlines were cut into 6' sections and transported to the City of Roswell, solid waste landfill. The total weight of the discarded flowlines was 8.5 tons.

Above Ground Tanks

The two above ground tanks at the site were removed by Wilbanks Trucking Company of Artesia, New Mexico, who accepted the tanks for disposal. The area where the tanks were located was returned to natural grade.

Crosby Salt Lake

The hydrocarbon material at the lake was excavated and disposed of onsite at the location near the lake agreed upon by the NMOCD at the last inspection in December 2002. Two disposal trenches were excavated at that location. One trench was 180' long, 25' wide and 18' deep resulting in the removal of 3,900 cubic yards of soil. Approximately 2,167 cubic yards of contaminated material was placed into this pit and the pit was capped with approximately 2,500 cubic yards of clay and sand. The second trench was 180' long, 30' wide and 16' deep resulting in the removal of approximately 4,160 cubic yards of soil. Approximately 2,600 cubic yards of contaminated material was placed into this pit and the pit was capped with approximately 2,500 cubic yards of clay and sand. The remaining soil that was excavated from the pits was used to build a roadway from the lakebed to the disposal site. This road was ripped and left in place after completion of the project.

SESI retrieved composite sample of the Dunes and the Discard Area. The samples were preserved on ice and sent under chain of custody to Cardinal Laboratories of Hobbs, New Mexico. The samples were analyzed for TPH (EPA method SE-846 8015 M), BTEX (EPA method SW-846 8260, and Chlorides (EPA method 4500-Cl⁻B). The results of the analysis are as follows:

ID	GRO	DRO	Cl	Benzene	Toluene	Ethyl	Total
						Benzene	Xylenes
D.C. Comp #1 Dunes	<10.0	233	5520	<0.005	<0.005	<0.005	<0.015
D.C. Comp #2 Dunes	<10.0	42.1	1020	<0.005	<0.005	<0.005	<0.015
D.C. Discard Area	<10.0	271	160	<0.005	<0.005	<0.005	<0.015

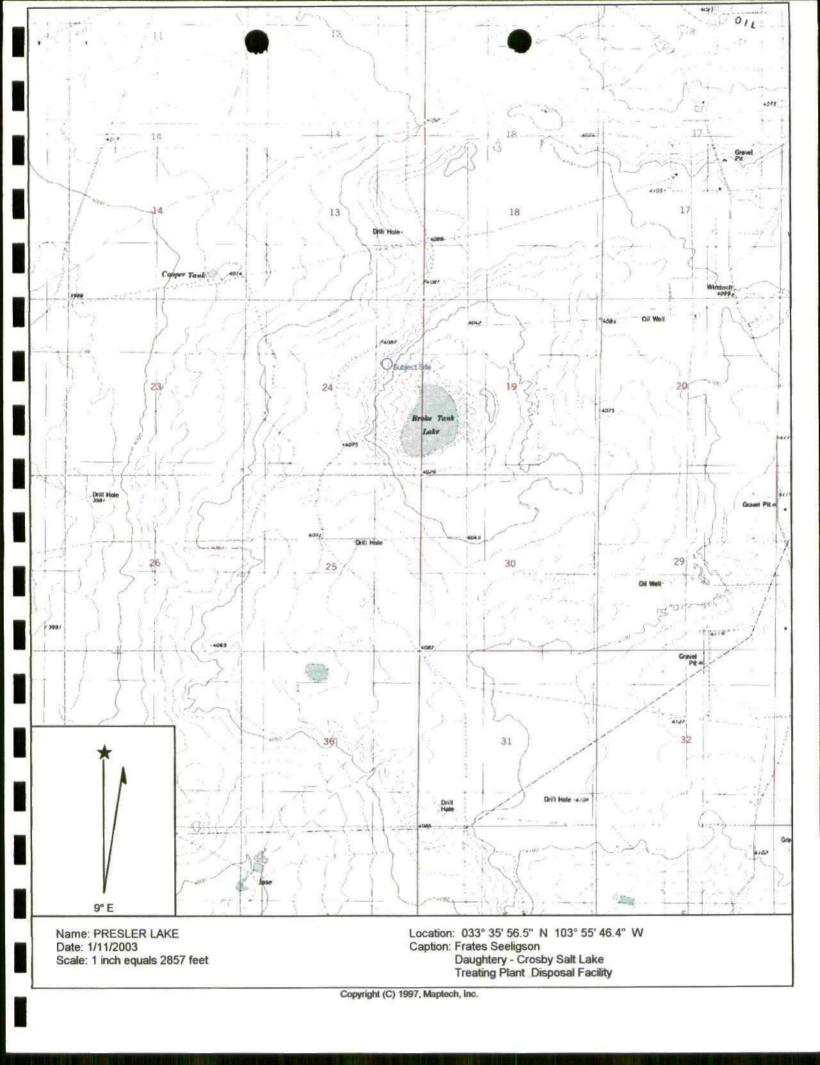
Area between Process Area and Crosby Lake

This area contained degraded hydrocarbon contamination along two "run" areas. This area was approximately 600' X 600' and was "disced" in place and broken into small pieces, which will hasten natural attenuation in the area.

The area was worked in a manner to avoid future erosion of the area. No vertical or horizontal investigation was performed in this area.

VI. Figures & Appendices

Figure 1 - Vicinity Map Appendix A - Analytical Results Appendix B - Site Photos Figure 1
Vicinity Map



Appendix A Analytical Results



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

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

ANALYTICAL RESULTS FOR

SAFETY & ENVIRONMENTAL SOLUTIONS, INC.

ATTN: BOB ALLEN 703 E. CLINTON, #103 HOBBS, NM 88240

FAX TO: (505) 393-4388

Receiving Date: 05/19/03

Reporting Date: 05/20/03

Project Number: SEE-02-001 Project Name: NOT GIVEN

Project Location: NOT GIVEN

Sampling Date: 05/16/03

Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

	GRO	DRO	
	(C_6-C_{10})	$(>C_{10}-C_{28})$	CI*
LAB NUMBER SAMPLE ID	(mg/Kg)	(mg/Kg)	(mg/Kg)

ANALYSIS	DATE	05/20/03	05/20/03	05/20/03
H7668-1	D.C. COMP #1 DUNES	<10.0	233	5520
H7668-2	D.C. COMP #2 DUNES	<10.0	42.1	1020
H7668-3	D.C. DISCARD AREA	<10.0	271	160
			-11- 11	
Quality Con	trol	814	844	990
True Value	QC	800	800	1000
% Recovery	1	102	106	99.0
Relative Pe	rcent Difference	2.5	3.4	6.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl⁻: Std. Methods 4500-Cl⁻B *Analyses performed on 1:4 w:v aqueous extracts.

Burgate Agaly Chemist

Transfer Hales

3/20/03

Date

H7668A.XLS



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

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

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC.

ATTN: BOB ALLEN 703 E. CLINTON, #103 HOBBS, NM 88240 FAX TO: (505) 393-4388

Receiving Date: 05/19/03 Reporting Date: 05/20/03

Project Number: SEE-02-001

Project Name: NOT GIVEN Project Location: NOT GIVEN

Sampling Date: 05/16/03 Sample Type: SOIL

Sample Condition: COOL & INTACT

Sample Received By: BC

Analyzed By: BC

LAB NUMBER	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DA	TE	05/19/03	05/19/03	05/19/03	05/19/03
H7668-1	D.C. COMP #1 DUNES	<0.005	<0.005	<0.005	<0.015
H7668-2	D.C. COMP #2 DUNES	<0.005	< 0.005	< 0.005	<0.015
H7668-3	D.C. DISCARD AREA	<0.005	<0.005	<0.005	<0.015
Quality Control		0.090	0.092	0.088	0.262
True Value QC		0.100	0.100	0.100	0.300
% Recovery		89.8	91.9	88.2	87.2
Relative Percei	nt Difference	3.2	6.6	2.0	1.6

METHOD: EPA SW-846 8260

Date

ARDINAL LABORATORIES, INC. 2111 Beechwood, Abilene, TX 79603.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240

(505) 393-2326 Fax (505) 393-2476

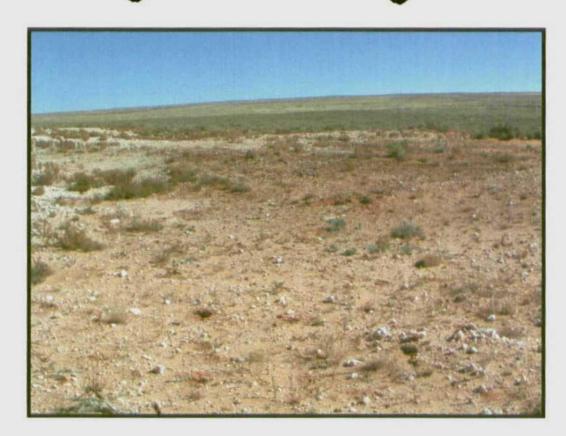
(915) 673-7001 Fax (915) 673-7020

9

Terms and Conditions: Merest wis be charged on at accounts more than 30 days past due at the rate of 24% per aroum from the original date of Involos, and all costs of colections, including attorney's fees. ANALYSIS REOUEST ☐ No Additional Fax #: ☐ No analyses. At claims including those for need general and any other cause whatecever shall be dramed weived unless made in writing and received by Cardnal within 30 days after completion of the applicable service. In so evert shet Cardhal be table for incidental or consequental demages, including without Imitation, business interruptions, base of use, or loss of profits incurred by clerk, its subdistries, PLEASE NOTE: Liabily and Damagoe. Cardhal's sability and clerk's exclasive namedy for any daim sciency whether based to correct or lort, shall be impled to the emour paid by the oten for the Fax Result: REMARKS: 01.5% F-16-03 10:09 TIME Will D SAMPLING PO #: 1-18-C3 DATE ZIp: 5 1603 00 BILLTO : ABHTC PRES. Company: ICE I COOF Address: Phone #: Received By: (Lab Staff) Fax#: State: Attn: CITY: : A3HTO No. To No. To No. SCUDGE MATRIX OIF TIOS 000 MASTEWATER ЯЗТАМОИООЯЗ State: NM ZIp: 88240 -19-G> Time: **# CONTAINERS** Day 15/0 (a) RAB OR (C) OMP. 33 Project #: 555-00-001 Project Owner: O.C. COMP# 2) Dunc C. COMPT Dus Date: 🖊 C. DISCARD PIED Sample I.D. Address: 703 E, CLINTON, #103 Phone #: (505) 397-0510 Sampler - UPS - Bus - Other: Delivered By: (Circle One) Fax #: (505) 393-4388 Company Name: Project Manager: Project Location: FOR LAB USE ONLY Relinquished By: LAB I.D. Project Name: City: HOBBS T

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

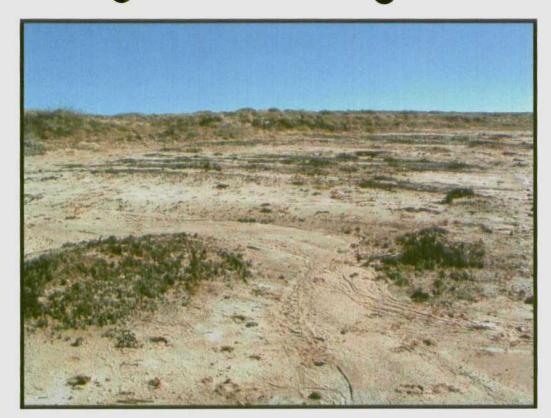
Appendix B Site Photos



Process Area Before 11/20/02



Process Area Before 11/20/02



Lake Shore Before 11/20/02



Lake Shore Before 11/20/02



Lake Shore Before 11/20/02



Lake Shore Before 11/20/02



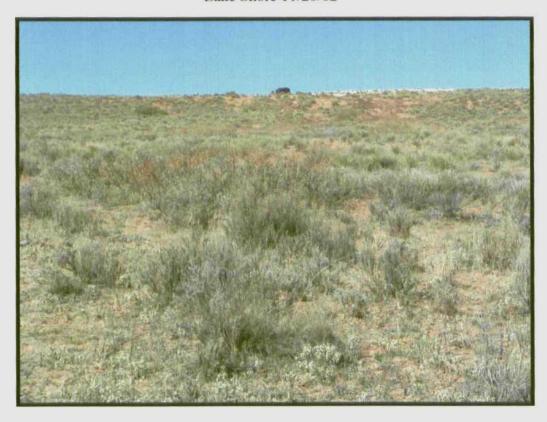
Typical "Run" at Lake Shore 11/20/02



More "Run" at Lake Shore 11/20/02



Lake Shore 11/20/02



"Run" Area Between Process Area & Lake Bed 11/20/02



"Run" Area Between Process Area & Lake Bed 11/20/02



"Run" Area 11/20/02



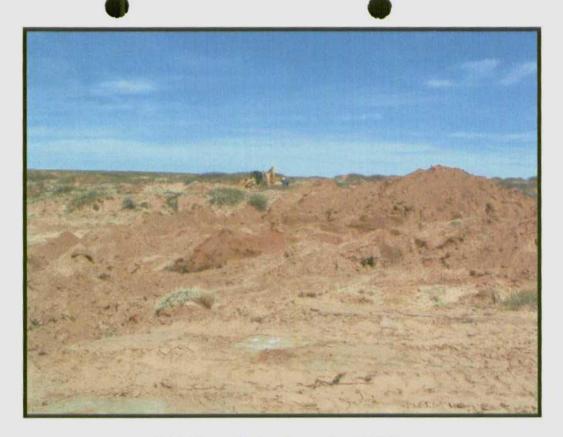
"Run" Area 11/20/02



Lake Shore During Excavation 3/5/03



"Typical" Material Found at Lake Shore 3/5/03



Lake Shore During Excavation 3/5/03



Lake Shore During Excavation 3/5/03



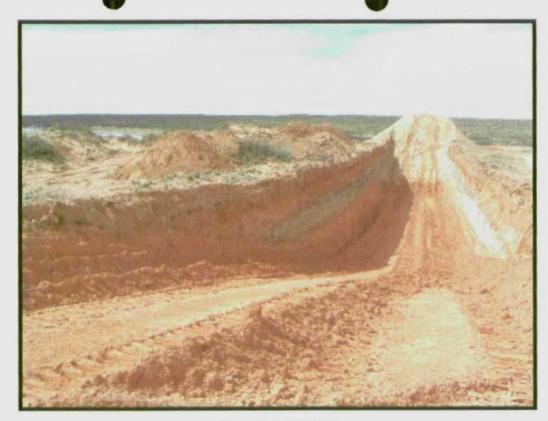
"Typical" Material Found at Lake Shore 3/5/03



Lake Shore During Excavation 3/21/03



Trench #1 3/21/03



Trench #1 3/21/03



Lake Shore During Excavation 3/25/03



Lake Shore During Excavation 3/25/03



Spoils Pile 3/25/03



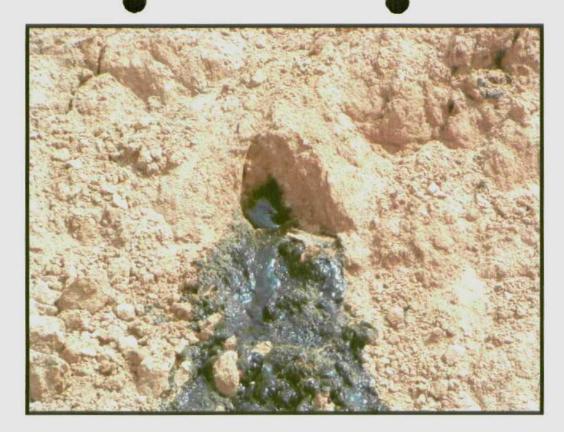
Lake Shore 3/25/03



Spoils Pile 3/25/03



Spoils Pile 3/25/03



Spoils Pile 3/25/03



Spoils Pile 3/25/03



Contaminated Material Being Placed in Trench 3/25/03



Partially Filled Trench #1 3/25/03



Partially Filled Trench #1 3/25/03



Lake Shore 4/4/03



Lake Shore 4/4/03



Lake Shore 4/4/03



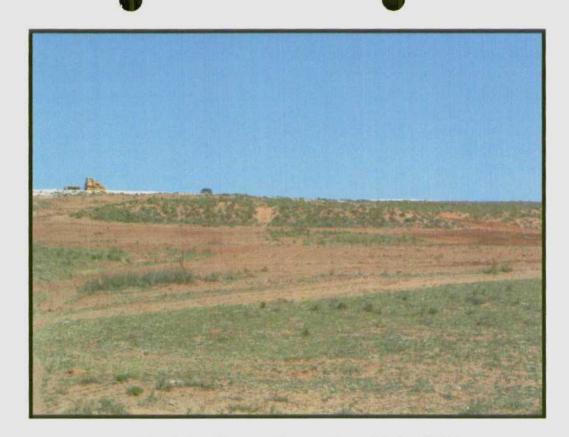
Lake Shore 4/4/03



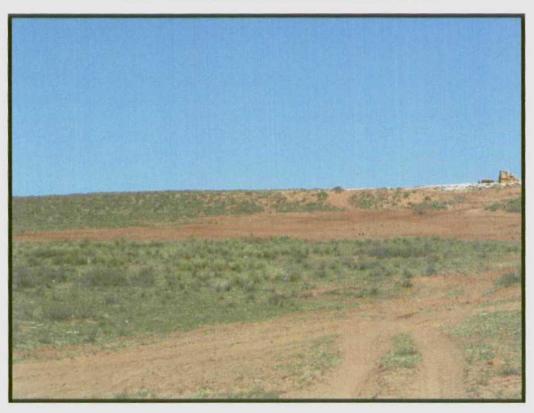
Trench #2 4/4/03



Lake Shore 4/4/03



"Run" Area Between Process Area & Lake 4/4/03



"Run" Area Between Process Area & Lake 4/4/03



"Run" Area Between Process Area & Lake 4/4/03



"Run" Area Between Process Area & Lake 4/4/03



"Run" Area Between Process Area & Lake 4/4/03



Lake Shore Final 5/16/03



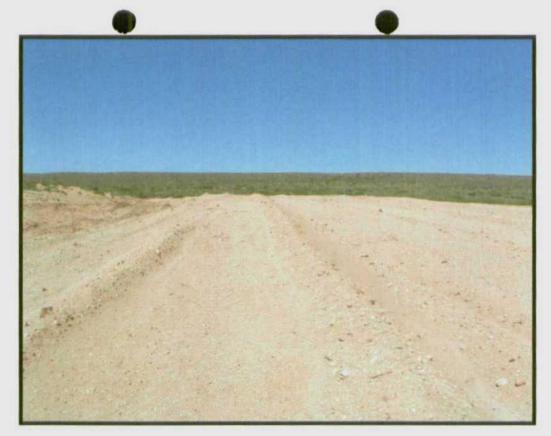
Lake Shore Final 5/16/03



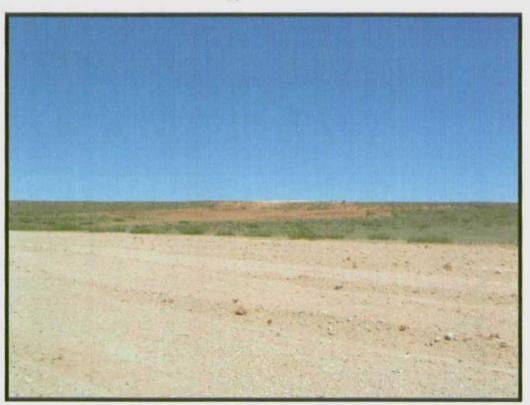
Example of Isolated Small Run Soil Sampled Underneath This Run 5/16/03



Soil Sample Location5/16/03



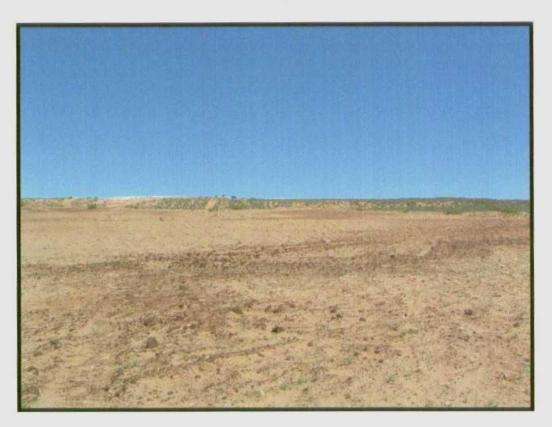
Capped Trench 5/16/03



Capped Trench 5/16/03



Run Area 5/16/03



Run Area 5/16/03



Run Area 5/16/03



Process Area Final 5/16/03



Overview of Project Final 5/16/03



Overview of Project Final 5/16/03



Above Ground Tank Area Final 5/16/03

Kieling, Martyne

From:

Stubblefield, Mike

Sent:

Friday, March 28, 2003 2:44 PM

To:

Kieling, Martyne Arrant, Bryan

Cc: Subject:

Remediation actions Daughtery Treating Plant & Disposal Facility

Martyne,

Here are some photo's taken on my inspection today.

The remediation actions will probably be concluded today along the lake shores and on the sand dune area to the east of the lake playas. Some of the photo's are of the disposal pit excavated on the bench north and east of lake playas. One disposal pit has recovered materials in it and the disposal pit being excavated has the recovered materials stockpiled near it. Bob Allen will not cover the disposal pits until next Friday giving Frates a chance to see the open pits. Remediation operations will now start to correct through blending the degraded hydrocarbon going from the closed treating facilty site down to the lake playas.

Will keep you informed as the project progresses.

Mike S.















MVC-005F.JPG

MVC-006F.JPG

MVC-007F.JPG

MVC-008F.JPG

MVC-009F.JPG

MVC-010F.JPG

MVC-011F.JPG







MVC-013F.JPG

Kieling, Martyne

From:

Stubblefield, Mike

Sent:

Wednesday, March 12, 2003 7:10 AM

To:

Kieling, Martyne

Subject:

RE: Daughtery/White Lakes

Martyne,

I made my weekly visit to the Daughtery treating site yesterday.

A backhoe is on site excavating and stockpiling the degraded hydrocarbon from the lake shores. There are some places were contamination has penetrated deeper than expected. Bob Allen is meeting with Frates today before excavating to vertical extent in the mentioned areas. It is estimated that the stockpiling actions will take at least two more weeks. When the recovery and stockpiling actions are concluded and the stockpiled materials are ready for burial I would like to have you inspect the lake shoreline for your approval on final excavation near the lake. I will E-mail you when the area as I have mentioned is ready for your inspection.

Mike S.

----Original Message----

From:

Kieling, Martyne

Sent:

Tuesday, March 11, 2003 2:56 PM

To:

Stubblefield, Mike

Subject:

Daughtery/White Lakes

Mike,

How are things going out at the old Daughtery treating plant and the lake shore cleanup. Please advise should I come for a day visit to check on the cleanup around the lake? as you probably know our travel has been halted as far as per deim is concerned. But I will come if I can squeeze it all in one day. Let me know what you think.

Martyne J. Kieling

Martyne J. Kieling

Environmental Geologist



P.O. Box 1613 703 E. Clinton Suite 102 Hobbs, New Mexico 88240 505/397-0510 Fax 505/393-4388

Safety & Environmental Solutions, Inc.

April 17, 2003

Mrs. Martyne Kieling Environmental Geologist Oil Conservation Division P.O. Box 6429 Santa Fe, NM 87504

Dear Martyne:

This letter will request a modification to the approved work plan for the Daughtery-Crosby Salt Lake Treating Plant. As we discussed during our telephone conversation today, Mr. Seeligson had agreed to install boreholes in order to delineate the process area as well as cap it with caliche. However, after further review of that area, it is our feeling that there is only minimal surface contamination in the form of "hardpan" or well degraded hydrocarbons is present in that area. There is no evidence of contamination that would migrate either vertically or horizontally from that area. The "hardpan" can be disced in place and broken into small pieces which will hasten natural attenuation in the area.

Please consider this request to allow only discing the area instead of the original plan. We feel this is a reasonable action considering the overall improvement in the facility due to the completion of the remaining steps in the approved work plan.

Thank you for your consideration in this matter. If I may answer any questions of be of further service, please call me.

Sincerely,

Bob Allen CHMM, REM, CET, CES President

BA/jra



NEW MOXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor Joanna Prukop Cabinet Secretary

April 21, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

RE: Remediation / Cleanup

Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility

Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E;

and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Dear Mr. Seeligson:

The New Mexico Oil Conservation Division (OCD) has received the letter dated April 17, 2003 from Safety & Environmental Solutions, Inc. requesting to modify the Remediation and Cleanup Work Plan, dated January 10, 2003, for the Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility. The OCD hereby approves of the modification to disc or rip the process area to aid in the natural attenuation.

Please be advised that this approval does not relieve Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility of responsibility for compliance with other federal, state or local regulations.

If there are any questions, please contact me at (505) 476-3488.

Sincerely

Martyne J. Kieling

Environmental Geologist

xc:

Artesia OCD

Bob Allen, Safety & Environmental Solutions, Inc., 703 E. Clinton Suite 102, Hobbs, NM 88240

Kieling, Martyne

From:

Stubblefield, Mike

Sent:

Friday, April 18, 2003 6:34 AM

To:

Kieling, Martyne

Subject: RE: Daughtery

Martyne,

I believe Safety & Environmental Solutions request for modification of the work plan is based on a sound bases and is approval able.

Mike S.

----Original Message-----From: Kieling, Martyne

Sent: Thursday, April 17, 2003 3:31 PM

To: Stubblefield, Mike **Subject:** Daughtery

Mike,

I received a call from Bob Allen today and he submitted a request to modify the approved work plan for the Daughtery site. When you get a chance can you look this over and with your knowledge of the site give me your recommendation.

Add that the said the define

Thanks Martyne

----Original Message-----

From: Bob Allen [mailto:ballen@sesi-nm.com] Sent: Thursday, April 17, 2003 2:18 PM

To: Martyne Keeling

Subject:

Bob Allen Safety & Environmental Solutions, Inc. 505-397-0510



P.O. Box 1613 703 E. Clinton Suite 102 Hobbs, New Mexico 88240 505/397-0510 F305/393-4388

Safety & Environmental Solutions, Inc.

April 17, 2003

Mrs. Martyne Kieling Environmental Geologist Oil Conservation Division P.O. Box 6429 Santa Fe, NM 87504

Dear Martyne:

This letter will request a modification to the approved work plan for the Daughtery-Crosby Salt Lake Treating Plant. As we discussed during our telephone conversation today, Mr. Seeligson had agreed to install boreholes in order to delineate the process area as well as cap it with caliche. However, after further review of that area, it is our feeling that there is only minimal surface contamination in the form of "hardpan" or well degraded hydrocarbons is present in that area. There is no evidence of contamination that would migrate either vertically or horizontally from that area. The "hardpan" can be disced in place and broken into small pieces which will hasten natural attenuation in the area.

Please consider this request to allow only discing the area instead of the original plan. We feel this is a reasonable action considering the overall improvement in the facility due to the completion of the remaining steps in the approved work plan.

Thank you for your consideration in this matter. If I may answer any questions of be of further service, please call me.

Sincerely.

Bob Allen CHMM, REM, CET, CES

Bot allen

President

BA/ira





3737 Broadway - #210 San Amonio, TN 78209

Phone 210-826-5645 Fax 210-826-5689

February 20, 2003

Ms. Martyne J. Kieling, Environmental Geologist New Mexico Energy Minerals and Natural Resources Department Fax #505-476-3462

RE: Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility Section 19, T 8 S, R 30E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico National Surety Corporation, Bond No. 11132683654

Following is Paul Gabel's permission to do the work as outlined.

Frates Seeligson, Jr.



THE SEELIGSONS



Mr. Frates S Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

February 19, 2003

To Whom It May Concern:

Mr. Seeligson has our permission to perform the work outlined in the Remediation and Cleanup Work Plan on the Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility. We ask that Mr. Seeligson or the crew performing the work call either myself or our ranch manager the day before bringing equipment onto or beginning work on the ranch. We also request that any roads used to bring equipment to the job site be repaired to their condition before this project.

Sincerely.

Paul Gabel PO Box 9 Sudan TX 79371

806 227 2288 phone 806 227 2258 fax

Ranch Manager Terry Brice 505 398 3172 phone 505 631 0509 mobile

FAX COVER SHEET

P.O. Box 1613 703 E. Clinton Suite 103 Hobbs, New Mexico 88240 505/397-0510 Fax 505/393-4388

Safety & Environmental Solutions, Inc.

Send to: NMOCD	From: Jerri Lee
Attention: Martyne Kieling	Date: 2-20-03
Office Location:	Office Location:
Fax Number: 505-476-3462	Phone Number:

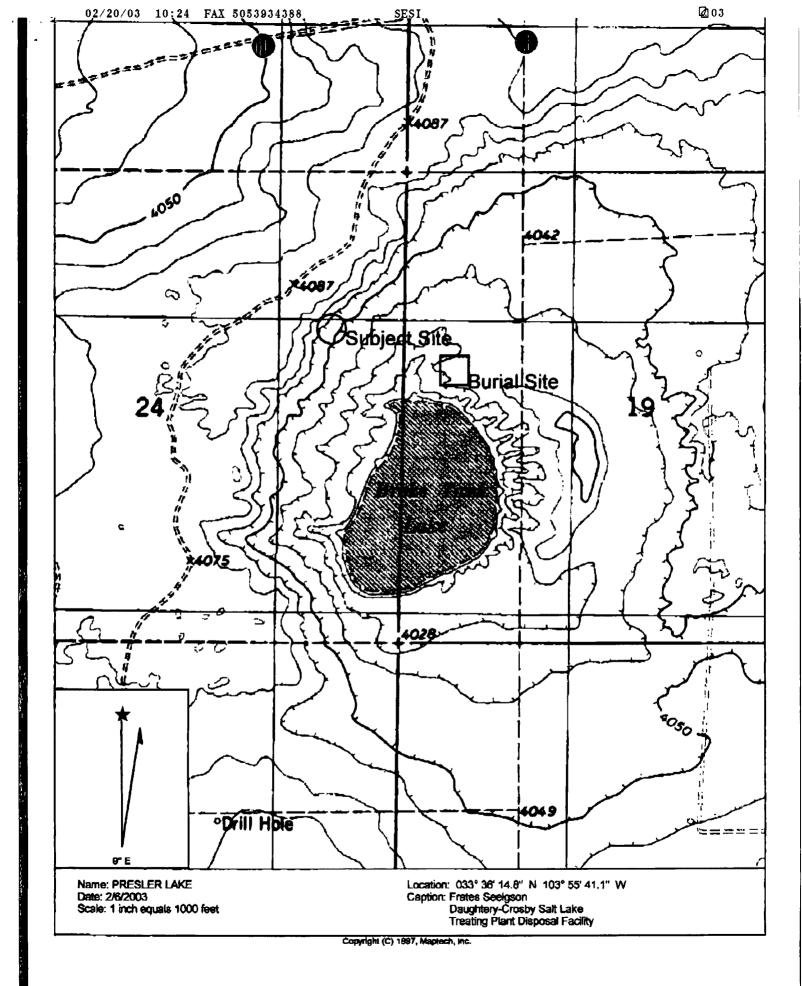
☐ Urgent

Reply ASAP
Please comment
Please review

☐ For your information

Total pages, including cover: 3

Comments:



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

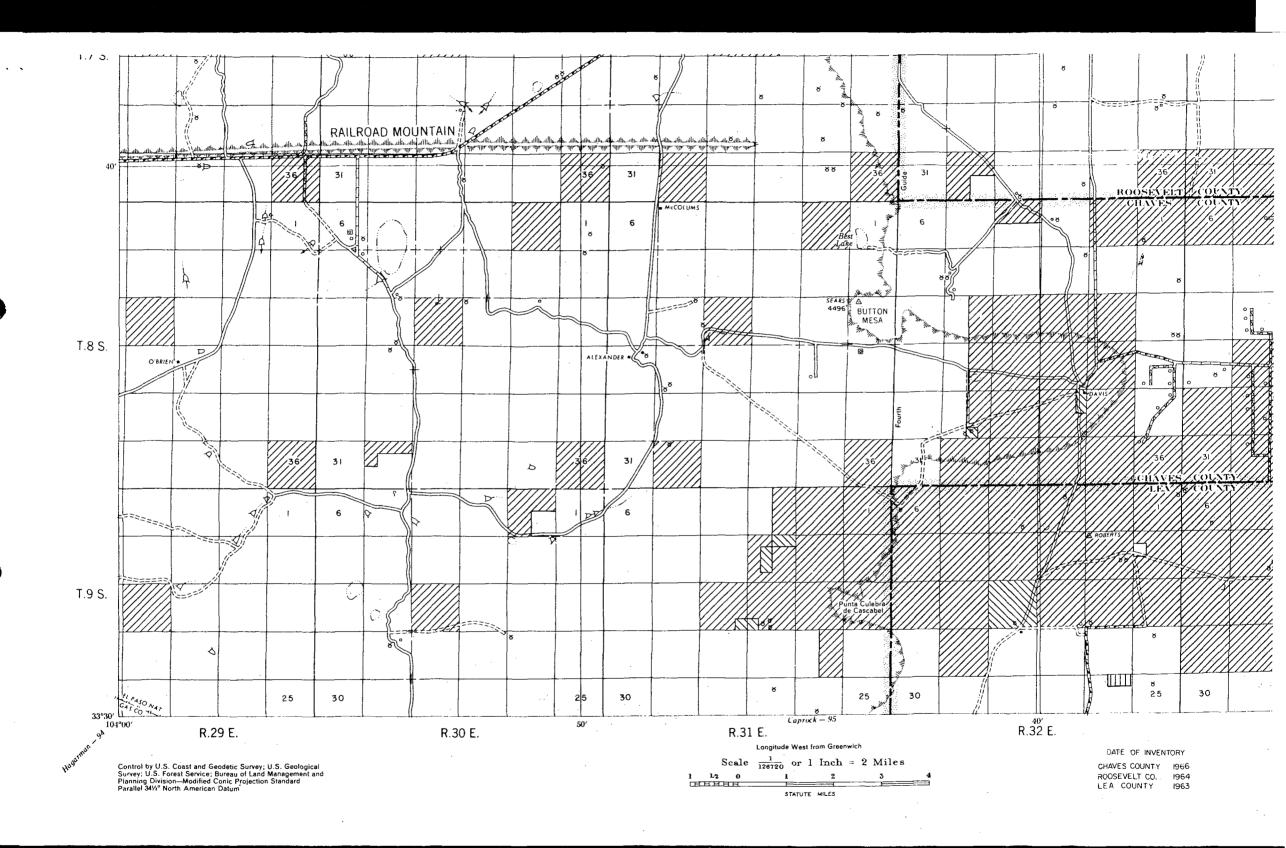
MEMORANDUM OF MEETING OR CONVERSATION

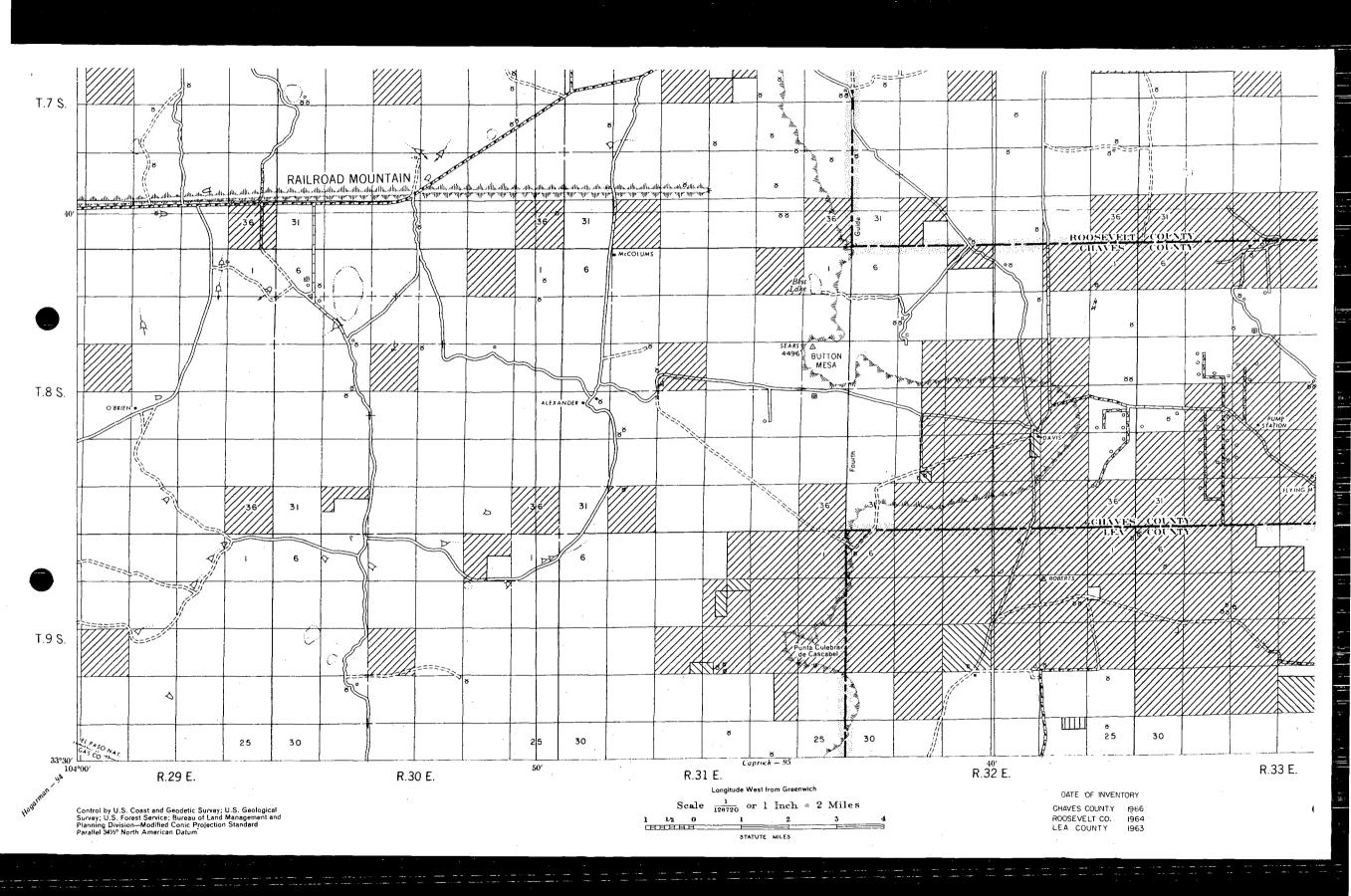
TelephonePersonal	Time 9:00 am Date 2-20-03
Originating Party Frances Seekyson	Other Parties Marky Kicking
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Subject Have Recieved Written	Approval to begin Clamp
Discussion will be calling to	of Approved letter.
	\$ 1
<u> </u>	
Conclusions or Agreements Distric	Mike StubbleGield will be
Distribution	Signed Mant July

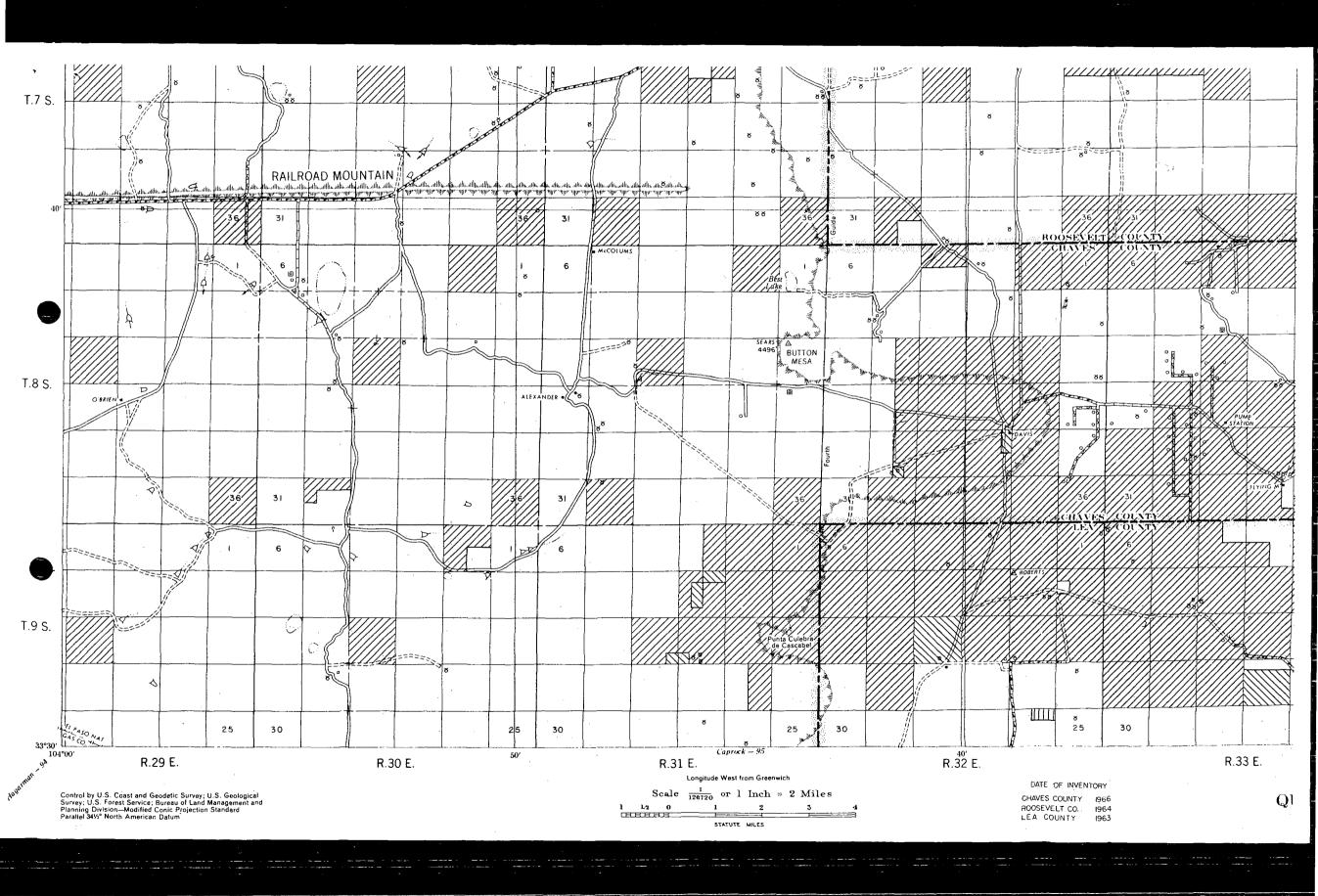
STATE OF NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

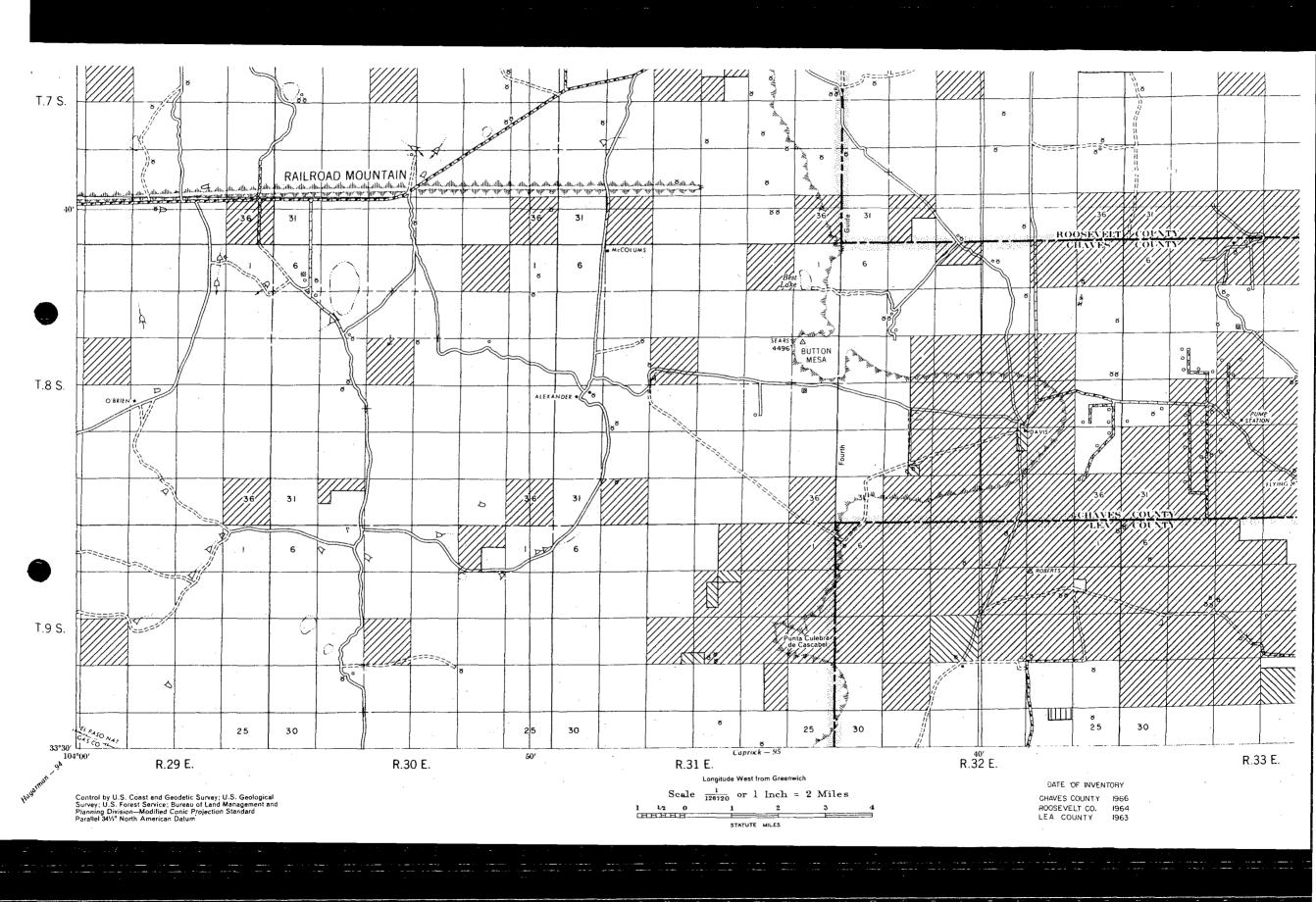
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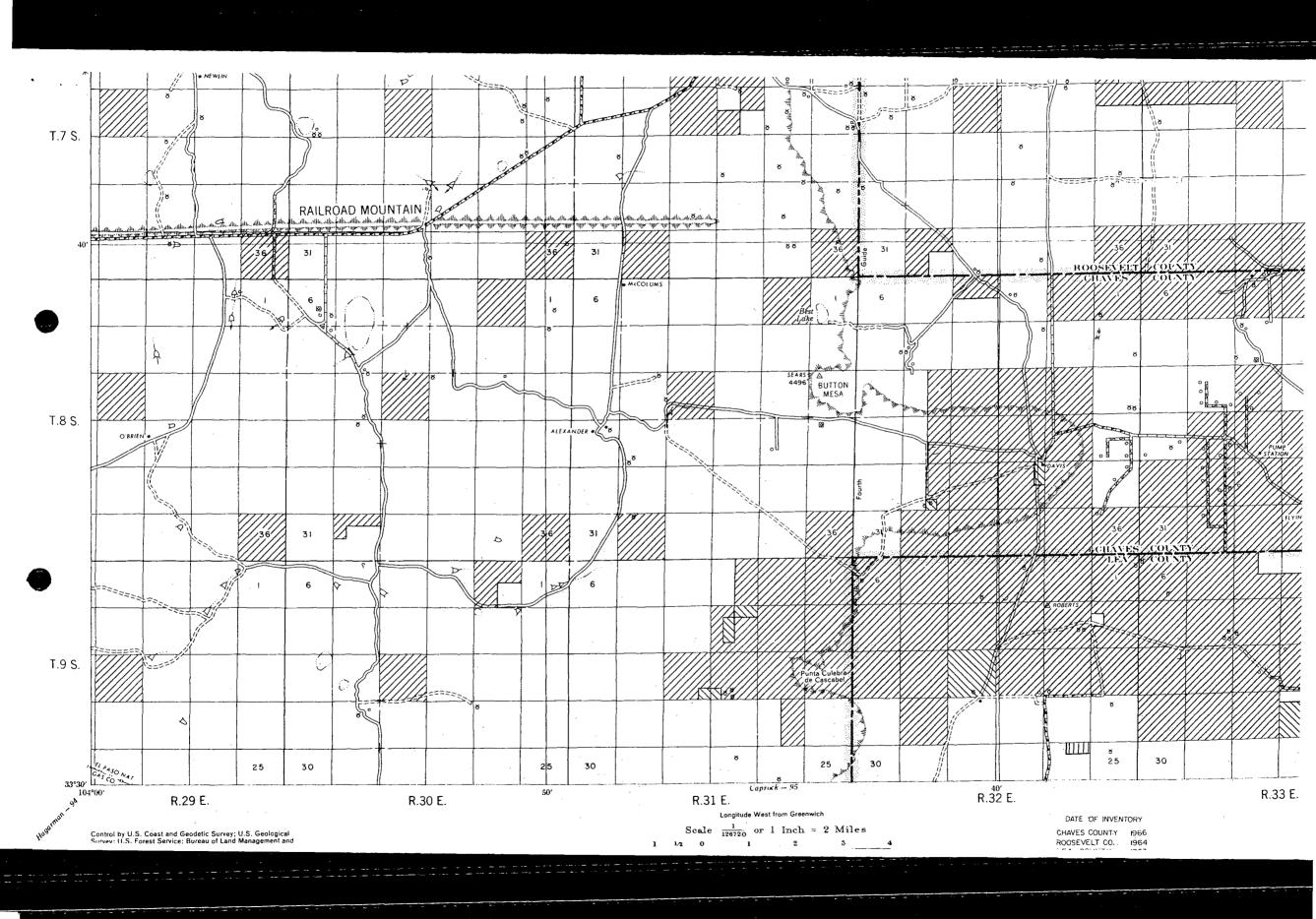
	2:30 Date 2-10-03
Originating Party Allen Hochage	Other Parties Martyne Kirling
Subject Daughty treating Plant.	Clennup.
Discussion Post owners of the (Are train to locate the Thur Harres) Just engaged a to Aid them in their Search	treating Plant Seeligson Execute Landowner. Laweger From Roshell ch.
Conclusions or Agreements Play The See!	igsons are Still Actively
Distribution	Signed MM













NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor
Joanna Prukop
Cabinet Secretary

January 31, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

RE: Remediation / Cleanup

Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E;

and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Dear Mr. Seeligson:

The New Mexico Oil Conservation Division (OCD) has received the Remediation and Cleanup Work Plan dated January 10, 2003 for the Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility. The OCD hereby approves of the remediation and cleanup plan prepared by Safety & Environmental Solutions, Inc. with the following conditions.

- 1. The landowner of record at the site must be notified and written permission must be received regarding the work outlined in the Remediation and Cleanup Work Plan.
- 2. A topographic map showing the disposal trench location that was discussed at the December 2002 site inspection must be included as part of the Work Plan.
- 3. The analytical results will be made available to the OCD as the work progresses.
- 4. The OCD Santa Fe and Artesia District offices must be notified within 48 hours of beginning the site work, within 48 hours of beginning trenching and with in 48 hours of covering and backfilling the disposal trench.
- 5. A final report will be submitted to the OCD Santa Fe office and a copy to the Artesia District office upon completion of the project. The report must include a detailed description of the work that was performed and must include all analytical results delineating nature and extent along with maps locating any and all remaining waste that is left or disposed of on site. The report should also describe where the flow lines and tanks were disposed or recycled.

Frates Seeligson Page 2 January 31, 2003

Please be advised that this approval does not relieve Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility of responsibility for compliance with other federal, state or local regulations.

If there are any questions, please contact me at (505) 476-3488.

Sincerely

Martyne J. Kieling

Environmental Geologist

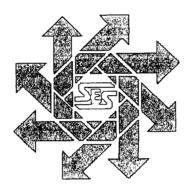
Xc:

Artesia OCD

Safety & Environmental Solutions, Inc., 703 E. Clinton Suite 102, Hobbs, NM 88240

Daughtery – Crosby Salt Lake
Treating Plant and Disposal Facility
Remediation/Cleanup Work Plan
Section 19, Township 8S, Range 30E
Section 24, Township 8S, Range 30E
Section 19, Township 8S, Range 29E
Chaves County, New Mexico

January 10, 2003



Prepared for:

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, Texas 78209

By:

Safety & Environmental Solutions, Inc. 703 E. Clinton Suite 102 Hobbs, New Mexico 88240 (505) 397-0510

TABLE OF CONTENTS

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Background	1
Contaminant and Size of Area	1
/ertical and Horizontal Extent of Contamination	1
Groundwater	1
ction Plan	1
igures	3

I. Purpose

The purpose of this work plan is to propose a plan for the cleanup of the area identified as the Daughtery – Crosby Salt Lake Treating Plant and Disposal Facility in the letter from the New Mexico Oil Conservation Division (NMOCD) to Mr. Frates S. Seeligson dated October 22, 2002. The subject area is located in Section 19, Township 8S, Range 30E, Section 24, Township 8S, Range 30E, and Section 19, Township 8S, Range 29E, in Chaves County, New Mexico. The site is situated on the White Lake Ranch privately owned by Mr. Kent Gable. The site was an NMOCD approved treating and reclaiming facility operated from the late 1970s to the late 1980s. This plan will allow closure in a manner that will protect the population, environment and groundwater of the area surrounding the subject location. (Figure 1)

II. Background

The subject site was used as a water treating and oil reclaiming facility in the past. The site is currently abandoned. Two abandoned tanks and many feet of associated flowlines are still on-site.

III. Contaminant and Size of Area

The suspected contaminant is crude oil and produced water associated with the treating and reclaiming facility. The crude oil and produced water is considered exempt oilfield waste. No evidence of other contaminants was observed.

IV. Vertical and Horizontal Extent of Contamination

A vertical and horizontal extent investigation has not been performed at this site. The only area requiring a vertical and horizontal extent investigation is the process area.

V. Groundwater

There is no protectable groundwater in the area according to the database provided by the New Mexico State Engineer's Office .

VI. Action Plan

The above referenced letter requires that the following areas be addressed at the subject site: Process Area, Flow Lines, Above Ground Tanks, Crosby Salt Lake and Area between Process Area and Crosby Lake.

The action plan for the closure of each area is detailed below.

Process Area

This area will be delineated for the vertical and horizontal extent of contamination. We plan to install three to four boreholes in the area from which samples will be taken from the appropriate depths and sent to a laboratory for analysis. The results will be documented in the closure report.

In addition, a cap of caliche material will be placed over this area. There will be no soil excavation or removal in this area.

Flow Lines

All flowlines left in the area that were associated with this facility will be cut up, and taken to a local landfill for proper disposal.

Above Ground Tanks

The two above ground tanks at the site will be removed.

Crosby Salt Lake

The hydrocarbon material at the lake will be excavated and disposed of onsite at the location near the lake agreed upon by the NMOCD at the last inspection in December 2002. A disposal trench will be excavated at that location and the contaminated soils placed in the trench. A 3' to 4' cap of native soil with a high clay content from the surrounding area will be place on top of the filled disposal trench.

SESI will take samples of the soil immediately under the material that is to be removed at several points around the area. These samples will be used to document the level of TPH under the material. No specific TPH level must be attained in this area.

Area between Process Area and Crosby Lake

This area contains degraded hydrocarbon contamination along two "run" areas. This area will be "disced" in place. The area will be worked in a manner to avoid future erosion of the area. No vertical or horizontal investigation will be performed in this area. No specific level of TPH must be attained in this area.

After completion of the project, the appropriate reports will be filed with the NMOCD in the closure report.

Figure 1 Vicinity Map



3737 Broadway - #210 San Antonio, TX 78209

Phone .. 10-826-5645 Fax 210-826-5689

RECEIVED

November 26, 2002

DEC 0 2 2002

Environmental Bureau
Oil Conservation Division

Ms. Martyne J. Kieling, Environmental Geologist New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility

Section 19, T 8 S, R 30E, Section 24, T 8 S, R 29 E, and

Section 19, T 8 S, R 29 E,

NMPM, Chaves County, New Mexico

National Surety Corporation, Bond No. 11132683654

Dear Martyne:

Just to follow up on the progress of the clean up of the Daughtery-Crosby Salt Lake Treating Plant and Disposal Facility, I just returned from Roswell where I had a meeting with both Bob Allen and Larry Gandy. I am awaiting their estimates on the cost of the cleanup and will contract one of the two once the information is at hand.

I hope this meets with your approval. Happy Thanksgiving.

Sincorely,

Frates Seeligson, Jr.



RECEIVED

NOV 3 1 2002

Environmental Bureau
Oil Conservation Division

P.O. Box 1613 703 E. Clinton Suite 102 Hobbs, New Mexico 88240 505/397-0510 Fax 505/393-4388

Safety & Environmental Solutions, Inc.

November 8, 2002

Mrs. Martyne Kieling Environmental Geologist Oil Conservation Division P.O. Box 6429 Santa Fe, NM 87504 RECEIVED

NOV 1 3 2002

Environmental Bureau
Oil Conservation Division

Dear Martyne:

Safety & Environmental Solutions, Inc. (SESI) has been retained by Mr. Frates Seeligson of San Antonio, Texas to perform assessment and remedial services at the Daughtery-Crosby Salt Lake Treating Plant and disposal facility. Mr. Seeligson is unable to travel to New Mexico until November 25, 2002 when we plan to meet at the site in order to finalize plans to comply with your letter of October 22, 2002.

In your letter you required a response by November 27, 2002; however, I would like to request an extension of time for that request to December 27, 2002. This extension of time will allow us adequate time to perform the assessment services and formulate an appropriate remediation plan.

Thank you for your consideration in this matter. If I may answer any questions of be of further service, please call me.

Sincerely.

Bob Allen

Bob Allen CHMM, REM, CET, CES

President

BA/ira



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor

Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 22, 2002

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. 7001-1940-0004-3929-8140</u>

Mr. Frates S. Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

RE: Daughtery - Crosby Salt Lake Treating Plant and Disposal Facility Inspection

Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E;

and Section 19, T 8 S, R 29 E,

NMPM, Chaves County, New Mexico

National Surety Corporation, Bond No.11132683654

Dear Mr. Seeligson:

The New Mexico Oil Conservation Division (OCD), inspected the Daughtery - Crosby Salt Lake treating plant and disposal facility located in the Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico, on June 3, 2002. The OCD inspection indicated that the facility requires some additional remediation. Below is a list of items that must be addressed prior to the OCD closing the site and returning the surety bond No.11132683654 for \$25,000 held by the National Surety Corporation. Please review Attachment 1 that contains photos taken during the inspection.

1. Process Area:

Petroleum contaminated soil is still evident at the processing area on top of the hill (see photo 1).

Contaminated soils must be either excavated and removed to an OCD approved disposal facility or be further remediated on site. Please refer to the enclosed "Unlined Surface Impoundment Closure Guidelines" for remediation and sampling guidance. The soil samples must be analyzed for total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and 'xylene (BTEX). Remediation levels are based on depth to groundwater, proximity to water wells, and proximity to surface water.

Upon approval of final remediation the process area must be reseeded with a native seed mix.

2. Flow lines:

Flow lines are still in place down the slope from the process area toward Crosby Salt Lake (see photo 5)

All flow lines associated with the treating plant and disposal operation must be recycled or disposed of at an OCD approved facility.

3. Above Ground Tanks:

Two of the former above ground tanks from the treating plant along with the catwalk (photo 7 & 8) have been moved off site to a location approximately one half mile west of the facility process area (see photo 6).

Any oil or BS&W material contained within these tanks must be hauled to an OCD approved waste management facility. Please supply written documentation that the current landowner at this location has taken possession of the tanks. If this is not the case the tanks and catwalk must either be recycled or disposed of at an OCD approved facility.

4. Crosby Salt Lake:

The cleanup activities in 1988 removed petroleum-contaminated soils from the lakebed and shoreline and placed the contaminated material along the upper banks of the lake. These contaminated soil piles are now weeping hydrocarbons that are running back down toward the lake playa (see photo 2, 3 and 4). Hydrocarbons migrating toward Crosby Salt Lake present a potential hazard to migratory birds.

Contaminated soils must be either excavated and removed to an OCD approved disposal facility or be further remediated on site. Please refer to the enclosed "Unlined Surface Impoundment Closure Guidelines" for remediation and sampling guidance. The soil samples must be analyzed for total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX). Remediation levels for this location are based on depth to groundwater, proximity to water wells, and proximity to surface water.

Please provide the OCD with a remediation plan for the Daughtery/Crosby Salt Lake treating plant and disposal facility. The remediation plan must address the above items and must include a timetable for beginning and completion of the project. A response is required by November 27, 2002.

The National Surety Corporation Bond No. 11132683654 for \$25,000 will remain in full force and affect until such time as the OCD has approved the remediation and closed the facility. If you have any questions please do not hesitate to contact me at (505) 476-3488.

Frates S. Seeligson October 22, 2002 Page 3

Sincerely,

Martyne J. Kieling

Environmental Geologist

Attachments

xc:

Artesia OCD Office

Shannon Dom SM1A25, Fireman's Fund Insurance Company, 777 San Marin Drive,

Navato, CA 94998

Attachment 1 Daughtery -Crosby Salt Lake Treating Plant Inspection June 3, 2002



Photo1. Contaminated soils at the former location of the treating plant.



Photo 2. Contaminated soils that were removed from Crosby Salt Lake in 1988 and piled along the edge of the lake.



Photo 3. Contaminated soils that were removed from Crosby Salt Lake in 1988 and piled along the edge of the lake.



Photo 4. Contaminated soil along the edge of the saltpan of Crosby Salt Lake. Hydrocarbons are weeping from the material and flowing back toward the lakebed.



Photo 5. Flow lines that extend from the top of the hill down to the lake.



Photo 6. Two tanks and one catwalk from the treating plant that have been moved west approximately ½ mile.

Attachment 1
Daughtery -Crosby Salt Lake Treating Plant



Photo 7. For Reference: Tanks at the facility in 08-27-1997



Photo 8. For Reference: Photo of tanks at the facility in 08-27-1997

Attachment 1
Daughtery -Crosby Salt Lake Treating Plant
Inspection June 3, 2002



Photo1. Contaminated soils at the former location of the treating plant.



Photo 2. Contaminated soils that were removed from Crosby Salt Lake in 1988 and piled along the edge of the lake.



Photo 3. Contaminated soils that were removed from Crosby Salt Lake in 1988 and piled along the edge of the lake.



Photo 4. Contaminated soil along the edge of the saltpan of Crosby Salt Lake. Hydrocarbons are weeping from the material and flowing back toward the lakebed.



Photo 5. Flow lines that extend from the top of the hill down to the lake.



Photo 6. Two tanks and one catwalk from the treating plant that have been moved west approximately ½ mile.

Kieling, Martyne

From:

Stubblefield, Mike

Sent:

Tuesday, June 04, 2002 10:00 AM

To:

Kieling, Martyne

Subject:

INSPECTION TRIP 6/3/2002 CHAVES COUNTY CROSBY SALT LAKE

MARTYNE,

HOPE YOU ARE FEELING WELL TODAY. HERE ARE PHOTO'S OF MY INSPECTION WITH MYSELF AND FRATES SEELIGSON JR. TAKEN AT THE OLD CROSBY SALT LAKE TREATING PLANT. PHOTO 003 TREATING PLANT SITE LOOKING FROM THE SOUTH.

PHOTO 006 HISTORIC HYDROCARBON SPILL REMOVED FROM THE LAKE PLAYAS TO THE

SAND HILLS DUE EAST OF THE CROSBY BRINE LAKE. PHOTO 007 HISTORIC HYDROCARBON SPILL REMOVED FROM THE LAKE PLAYAS TO THE

SAND HILLS DUE EAST OF THE CROSBY BRINE LAKE.

PHOTO 011 HISTORIC HYDROCARBON SPILL AT POINT OF ENTRY FROM TREATING PLANT TO CROSBY LAKE PLAYAS.

PHOTO 014 OLD FLOWLINE LEFT IN PLACE BETWEEN TREATING PLANT AND LAKE PLAYAS. PHOTO 005 STOCK TANKS REMOVED FROM TREATING PLANT AREA TO PASTURE EST. .4 MILE WEST OF OLD TREATING PLANT SITE.

PHOTO 006 FLOW LINES FROM TREATING PLANT REMOVED TO PASTURE LAND EST. .4 MILE WEST OF OLD TREATING PLANT SITE.

MIKE S.















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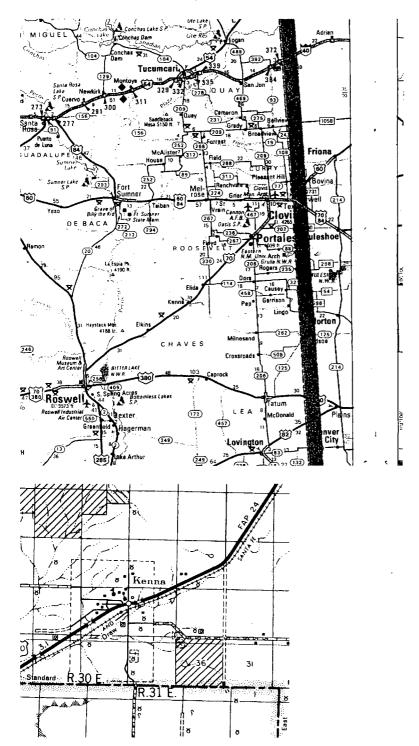
Frates, here are the directions that I promised.

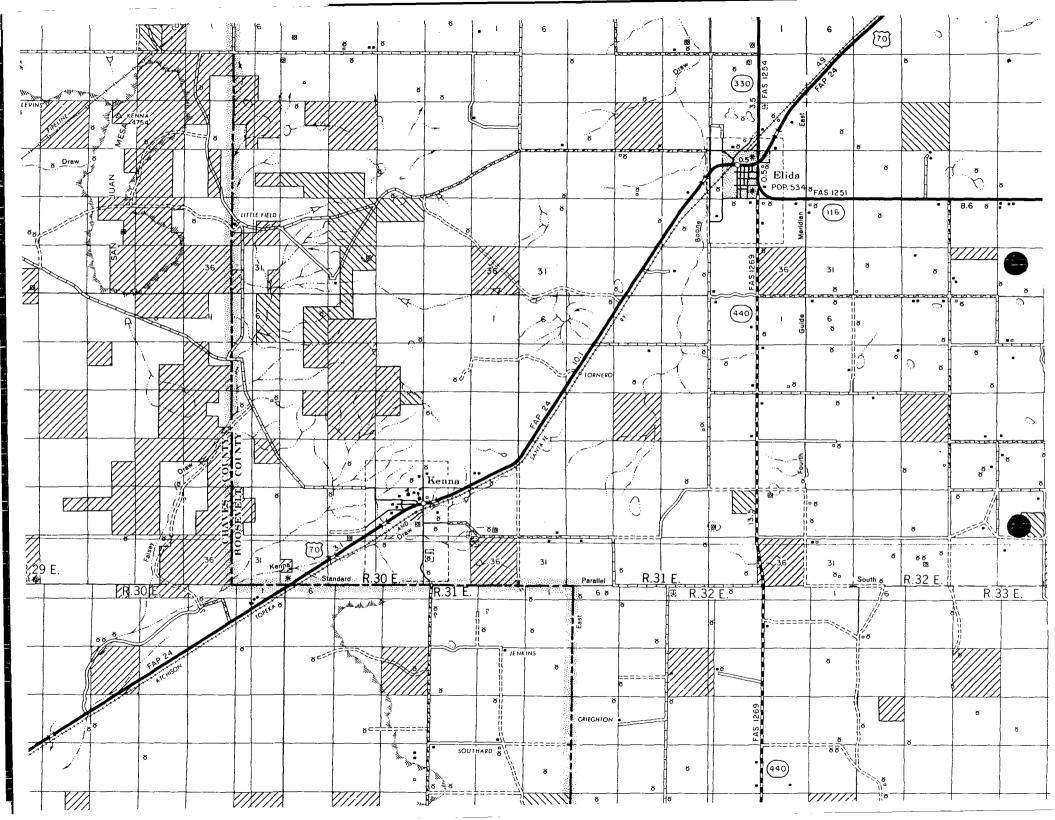
Lubbock, TX to Kenna, NM is approximately 152 miles.

Find Portales, NM. Go 24 miles West on US 70 to Elida, then another 10 miles west to Kenna (a wide spot in the road, so I am told).

I will meet you next to the Railroad tracks, on the south side of US 70, wherever the main turn off is for Kenna.

I will be driving a White Ford Expedition with NM Oil Conservation Division Labels on the side. I will have will have a cell phone with me 1-505-660-1067. MEET AT 10:00 am on June 3, 2002





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

MEMORANDUM OF MEETING OR CONVERSATION

Personal	Time 2:55 pm Date 4-23-02			
Originating Party Markyn Kieling	Other Parties Frates Seeligson Jr Cell 210-861-4881			
Subject Daughty Treating Plant.	Left message to pleax call Back			
Discussion_				
	<u> </u>			
Conclusions or Agreements				
Distribution	Signed Martyn J. H.S.			

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

MEMORANDUM OF MEETING OR CONVERSATION

Leftnessy.

	Time 12:27 Date 10-6-00 Returnd Call 10:15 10-11-00
Originating Party Fruits Seelisson	Other Parties Tr. Maye Kieling
Cellphone 210-861-4881	
Subject Daughting Treating Plant	
(Iwill head something i.	n writing as to what was Done
Discussion Meet at 10:00;	n Roswell November 7th Tresday.
Conclusions or Agreements	
Distribution	Signed Montyn 17h.

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

MEMORANDUM OF MEETING OR CONVERSATION

	# 4:01 Date Avgust 3/54 2000
Originating Party Fraks Seeli'g Son J 210-826-5645 ex 14	Other Parties Other Parties Martyne Kieling
Subject Daugntery While lake	e Ranch
Discussion Meet at Facility to	Close it out Chekout
hurk that was Dow	Less 1+ OVF CHEROUP
With A Date.	in a dy or two
Conclusions or Agreements	
Distribution	Signed Thating & The



JAN 25 1999

FRATES SLICK SEELIGSON, JR.

4040 Broadway, Suite #510 San Antonio, Texas 78209 210-826-5645

January 20, 1999

Ms. Martyne J. Kieling New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

RE: Crosby Salt Lake Treating Plant Inspection Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E; And Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Dear Ms. Kieling:

Pursuant to your letter dated November 20, 1998 and our phone conversation on January 19, 1999, Crosby Salt Lake intends to make all necessary corrections to the treating plant. The recommendations put forth in the OCD's November letter shall be the guidelines that we follow.

Crosby Salt Lake has already contacted Mr. A.L. Daugherty as a possible site restoration manager and the present landowner, Mr. Kent Gable, regarding the use of heavy equipment. In addition, Mr. Dirk Jones, attorney-at-law, was contacted for advice regarding environmental consultants. Furthermore, I myself plan to travel to Roswell, in hopes of expediting the operation.

Regarding a timetable for completion of each correction, I can only say as soon as possible. Having no prior experience with cleaning up oil field sites, any date of completion would be mere speculation on my part. However, what I propose to do is to maintain communication with the OCD through you, updating the progress. I hope this meets with your approval.

If you have any questions or concerns please feel free to phone at (210) 826-5645 ext. 14.

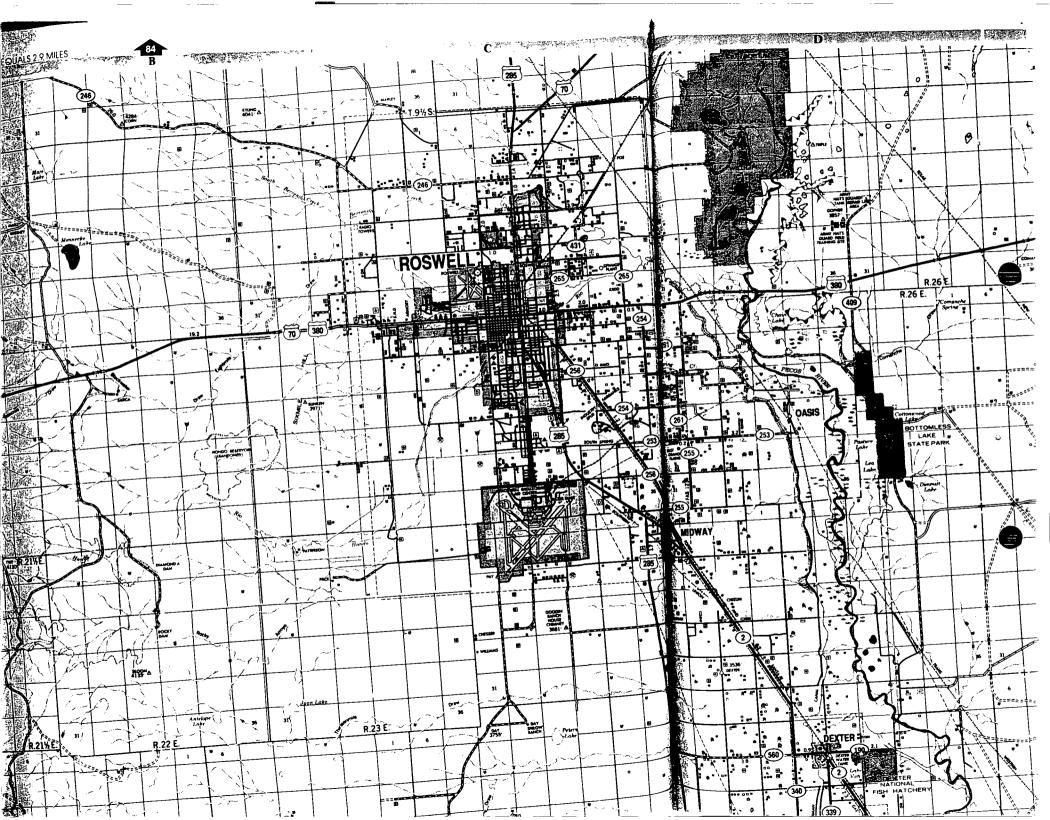
Sincerely,

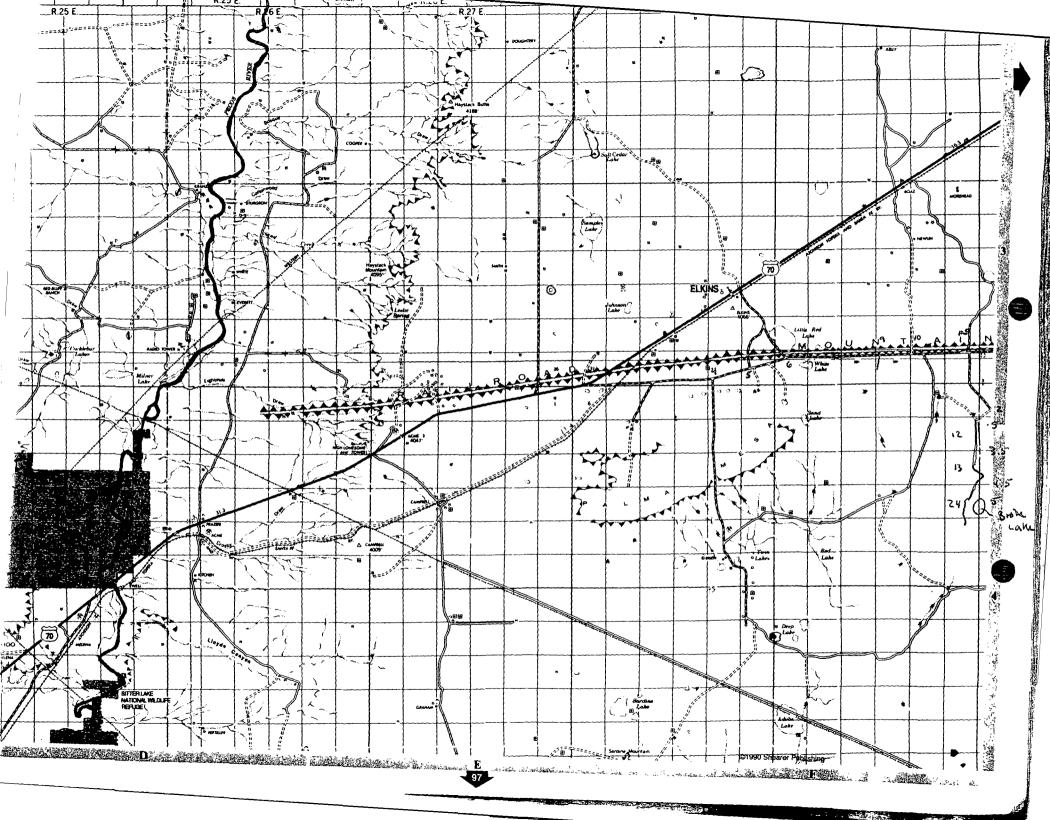
Frates Seeligson, Jr.

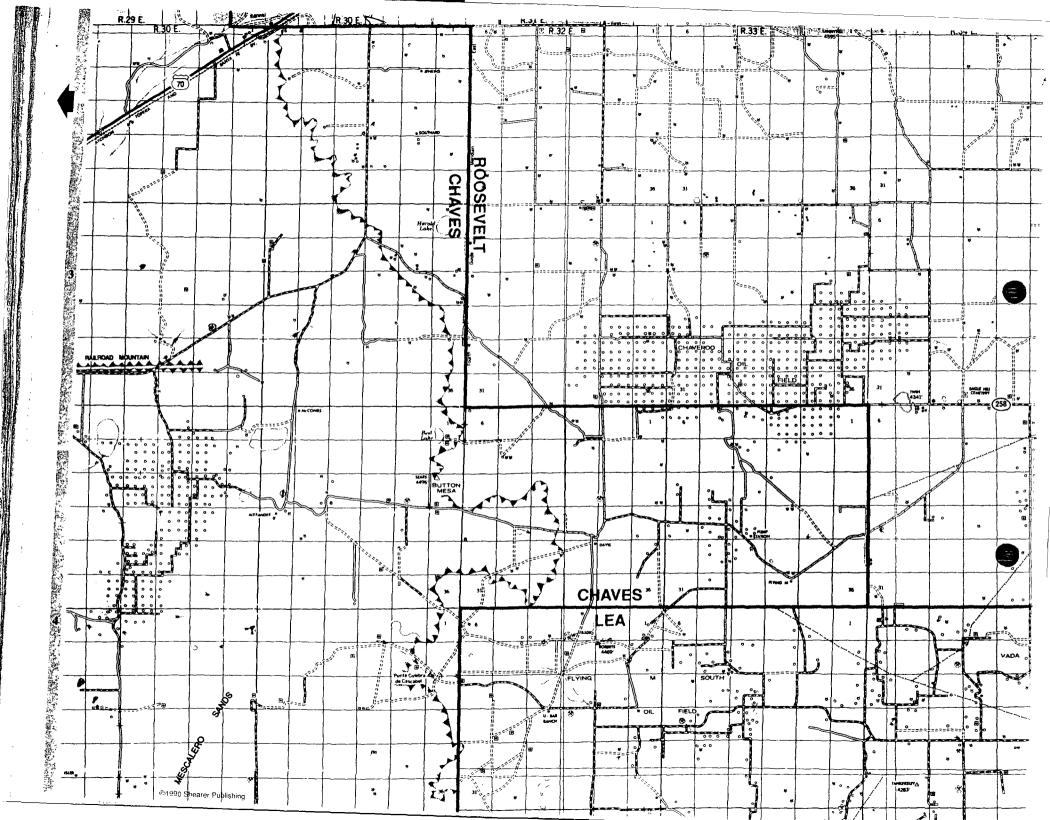
STATE OF NEW MEXICO OIL CONSERVATION DIVISION

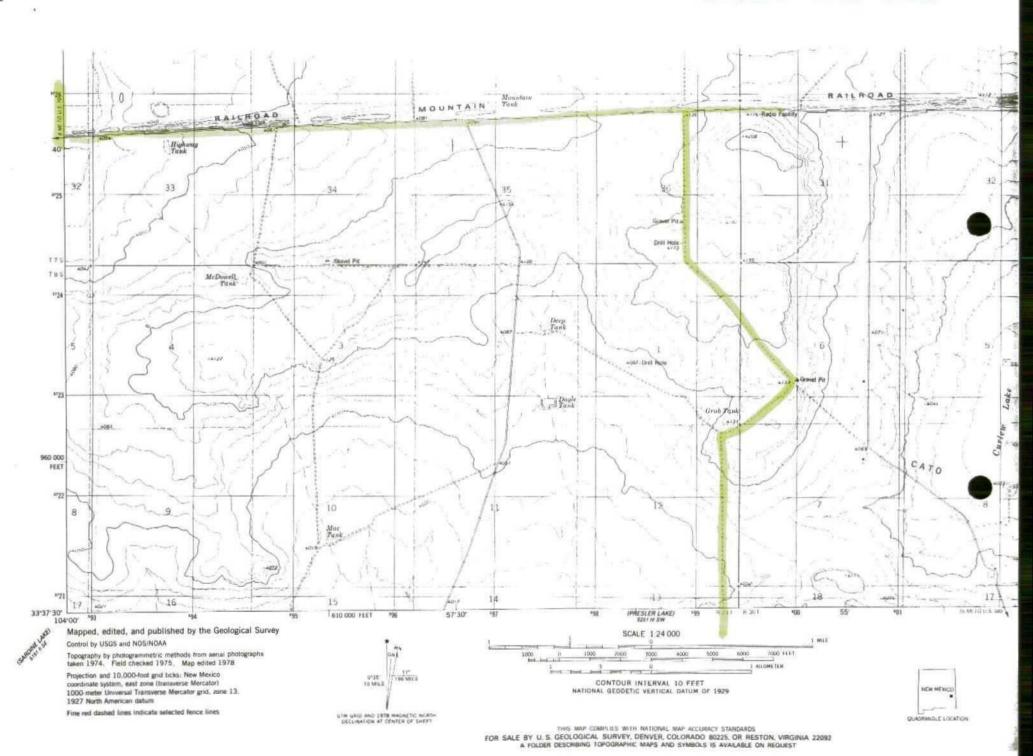
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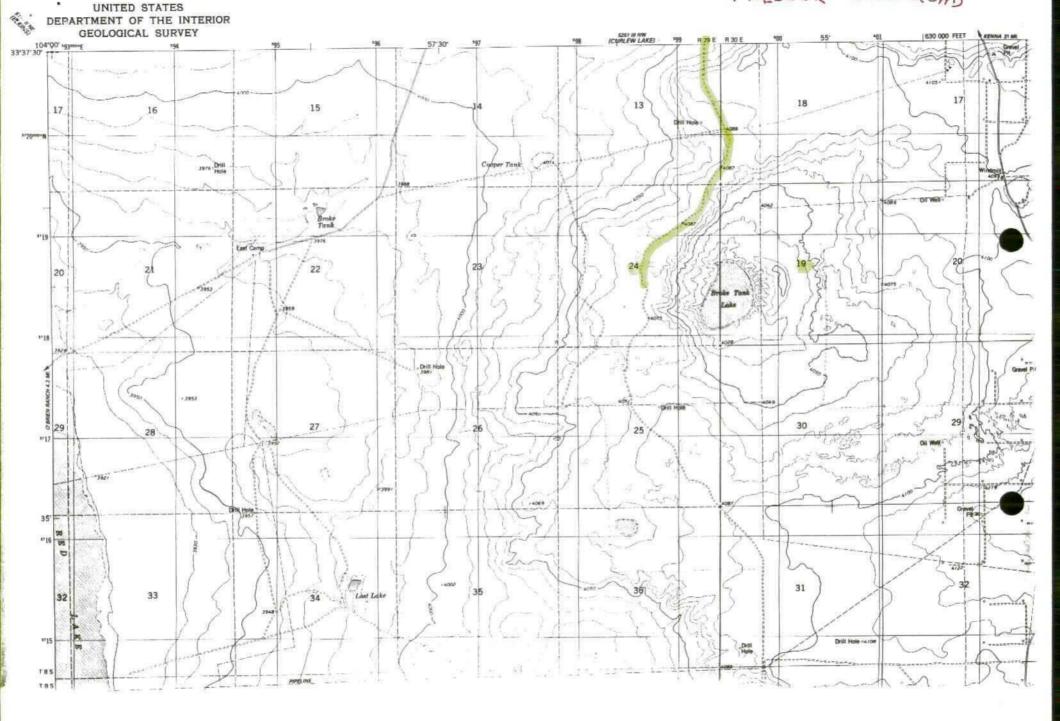
Telephone Personal	Time 2:00	1	Date \ -19-99		
Originating Party			Other Parties		
Martine Kichina		Frates Seeligon 7.			
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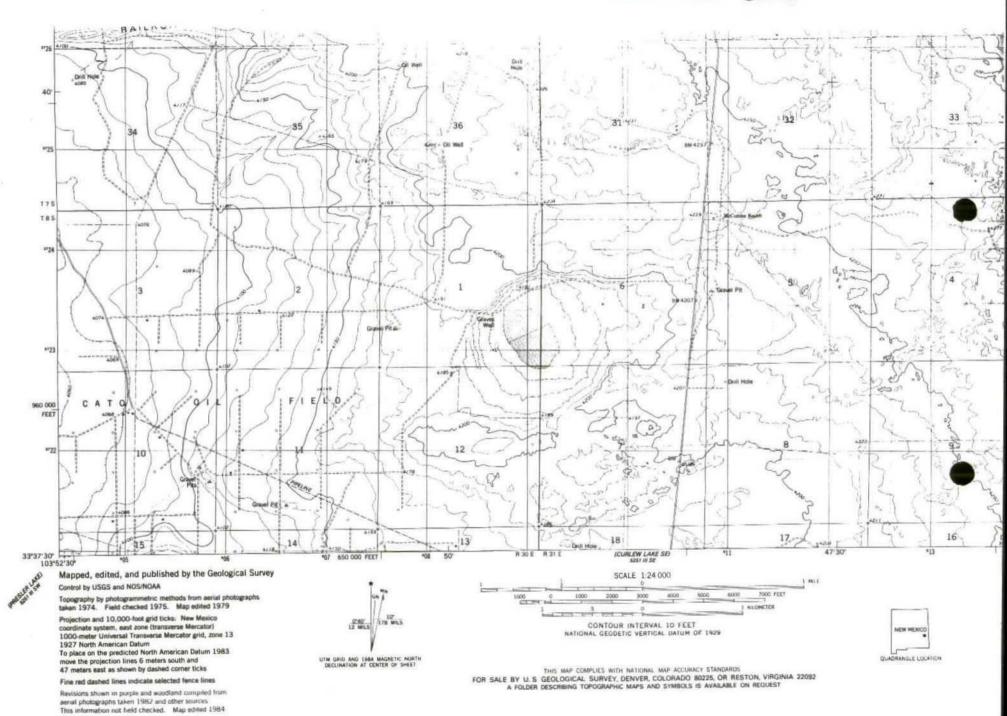












OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

November 20, 1998

<u>CERTIFIED MAIL</u> RETURN RECEIPT NO. P-326-936-488

Mr. Frates Seeligson 4040 Broadway Suite 510 San Antonio, TX 78209

RE: Crosby Salt Lake Treating Plant Inspection Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico

Dear Mr. Seeligson:

The New Mexico Oil Conservation Division (OCD), inspected the Crosby Salt Lake treating plant located in the Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM, Chaves County, New Mexico, on August 8, 1997 and again on May 18, 1998.

The OCD inspection, current file review and conversations with yourself and Mr. A.L. Daugherty indicate that the facility is to be closed however there are some permit deficiencies regarding closure which must be addressed.

The following is a list the permit closure deficiencies found at Crosby Salt Lake during the inspection. Attachment 1 contains photographs taken during the inspection on August 8, 1997 and again on May 18, 1998. Crosby Salt Lake shall provide the OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. A response is required by Crosby Salt Lake to these deficiencies by January 20, 1999.

1. Process Area:

There was evidence of leaks and deliberate spills around most of the above grade tanks (see pictures 1, 2, 3, 5, 6, 7, 10, 11, and 15 dated 8/8/97 and picture 1 dated 5/18/98). Pictures 1, 2 and 11 show that the small tank was jacked up and the drain port was open and oil was allowed to flow out onto the ground. Some of the spills and the tank bottom dump areas have been disked to allow for bioremediation to begin (pictures 2 and 4 dated 5/18/98).

The surface spill, tank area, and tank bottom dump area (pictures 12 and 13 dated 8/8/98) soils shall either be removed to an OCD approved disposal facility or be further remediated on site. The closure proposal shall include final testing of the soils for total

petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX). The proposal shall also include the reseeding the site with native grasses.

2. Spill Reporting:

All spills/releases shall be reported pursuant to OCD Rule 116. Enclosed please find a spill report form C-141 to be filled out and filed with the appropriate OCD District office.

3. Open Top Tanks and Pits:

To protect migratory birds, all tanks exceeding 16 feet in diameter, and exposed pits and ponds shall be screened, netted or covered unless rendered non hazardous (Order R-8952, Rule 711).

The small open toped tank was not netted. There is a large bird nest on the catwalk between the two tanks (see pictures 1 and 15 dated 8/8/97). Cattle tracks, five dead birds and a dead rodent were found in the spilled oil surrounding the tanks (see pictures 3, 4, 5, and 6 dated 8/8/97).

4. Above Ground Tanks:

If any oil or BS&W remains within the tanks the material shall be hauled to an OCD approved 711 waste management facility. All empty tanks shall be removed from the facility location.

5. Trash and Potentially Hazardous Materials:

All trash and potentially hazardous materials shall be properly disposed of. The contaminated soil at the facility area shall be remediated on sight and/or removed to an OCD approved 711 waste management facility (see picture 1, 2, 3, 4, 5, 6, 7, 10, 11, 12, 13, and 15 dated 8/8/97). The tanks, abandoned flow lines to Crosby Salt Lake (Picture 4 dated 5/18/98), piping, trash and equipment should be recycled or properly disposed of.

Norm inscale

6. Soil Spreading, Disking and Lift Thickness:

All contaminated soils to be landfarmed at the facility will be spread on the surface in six inch lifts or less and disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

7. <u>Historical Facility Spills:</u>

The historical spills that occurred along the flow line to Crosby Salt Lake are still evident (see pictures 8 and 9 dated 8/8/97 and picture 4 dated 5/18/98). The contaminated soil along the flow line route shall be sampled at several intervals and tested for total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylene (BTEX). Upon review of the analytical results the OCD will determine if any soil remediation is required.

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

Sincerely,

Martyne J. Kieling

Environmental Geologist

Attachments

xc:

Artesia OCD Office

Hobbs OCD Office

Mr. A.L. Daugherty, 400 Twin Diamond, Roswell, NM 88201

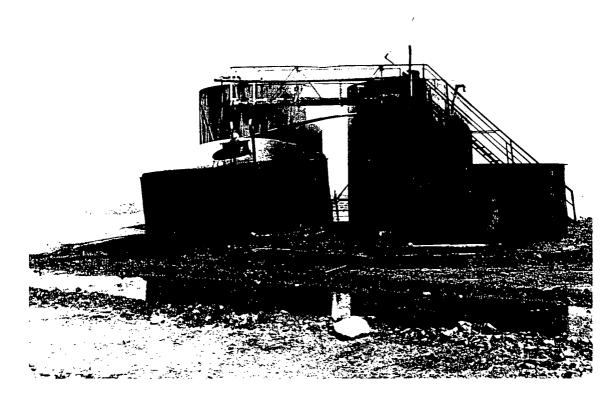


PHOTO NO. 1 DATE: 8/8/97

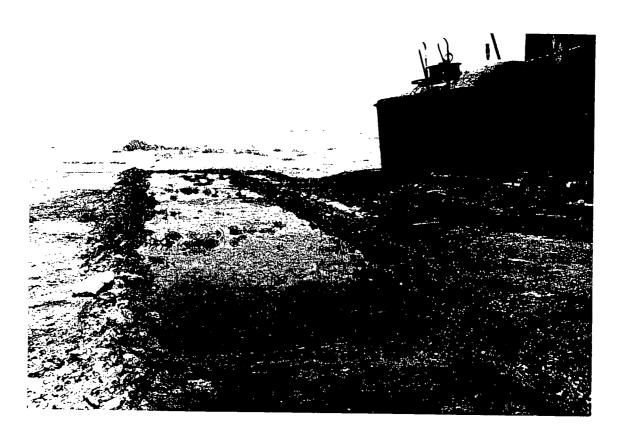


PHOTO NO. 2 DATE: 8/8/97



PHOTO NO. 3 DATE: 8/8/97



PHOTO NO. 4 DATE: 8/8/97

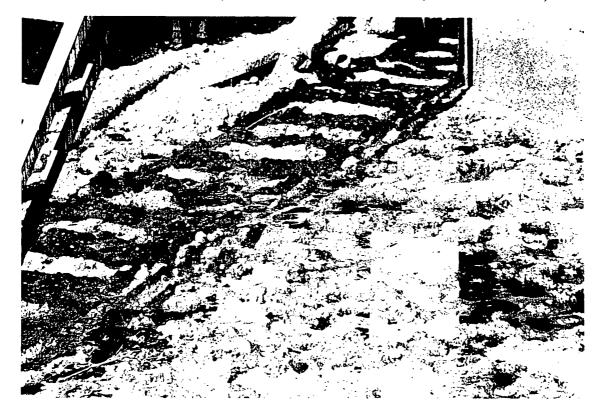


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PHOTO NO. 6 DATE: 8/8/97

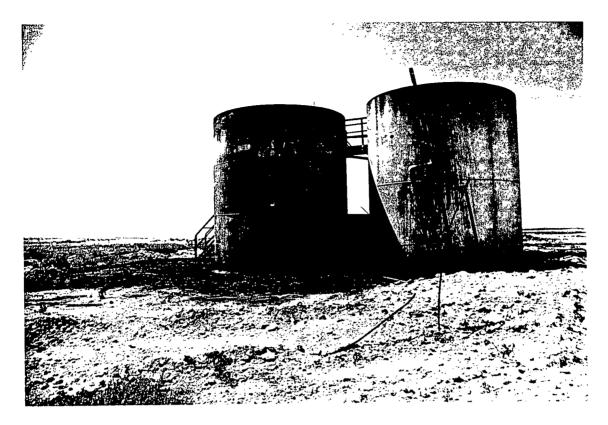
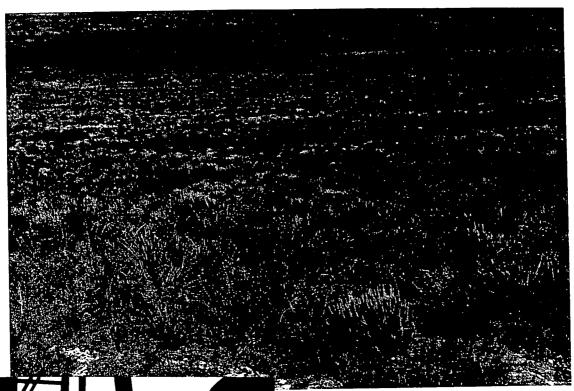


PHOTO NO. 7 DATE: 8/8/97



PHOTO NO. 8 DATE: 8/8/97





. 9 DATE: 8/8/97

PHOTO NO. 10 DATE: 8/8/97



11 DATE: 8/8/97

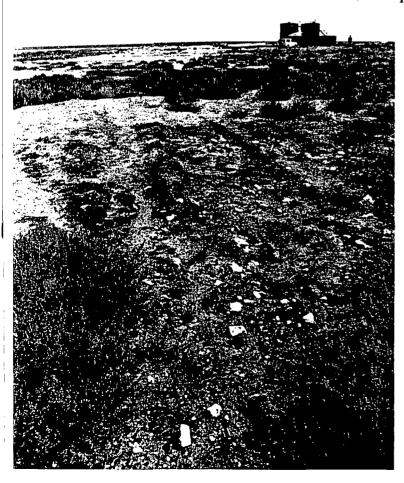


PHOTO NO. 12 DATE: 8/8/97



PHOTO NO. 13 DATE: 8/8/97



PHOTO NO. 14 DATE: 8/8/97

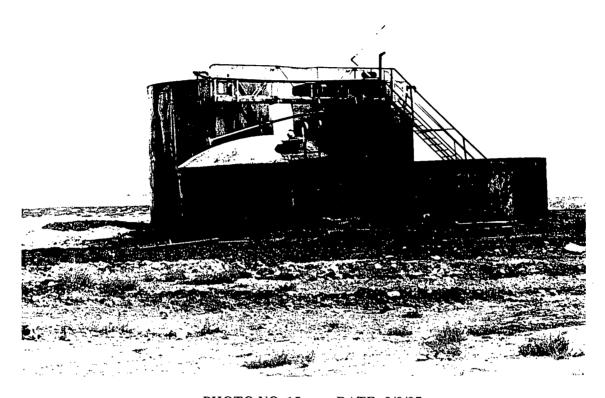


PHOTO NO. 15 DATE: 8/8/97



PHOTO NO. 1 DATE: 5/18/98

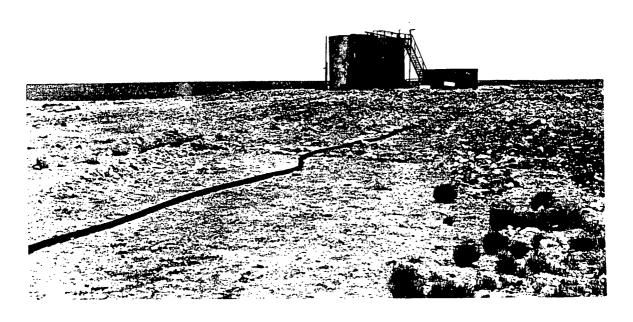


PHOTO NO. 2 DATE: 5/18/98

CROSBY SALT LAKE, 711 FACILITY INSPECTION (PHOTOS BY OCD)



PHOTO NO. 3 DATE: 5/18/98



PHOTO NO. 4 DATE: 5/18/98



A.L. Daugherty, White Lake Disposal OCD 711 Facility: August 27, 1997 Inspection Date:

Martyne Kieling, Santa Fe OCD Personnel: Ray Smith, Artesia

Treating Plant Tanks, Picture 11: Tank jacked up, open valve, tank contents drained onto ground.



OCD 711 Facility:
Inspection Date:
OCD Personnel:
A.L. Daugherty, White Lake Disposal
August 27, 1997
Martyne Kieling, Santa Fe
Ray Smith, Artesia

Former Treating Plant spills/ discharge pathway to Playa, Looking Southeast

Oil contaminated soil center of photo in dark green plants.

Picture 9:



OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 12: Treating Plant Tanks, Looking Southeast

Tank bottoms spread on ground North northwest of Tank area

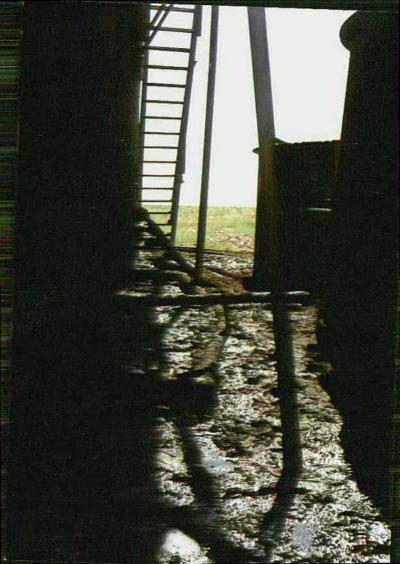


OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 13: Treating Plant Tanks, Looking Southeast

Tank bottoms spread on ground Northwest of Tank area



OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 10: Treating Plant Tanks, Looking south southwest
Oil contaminated soil next to Treating Plant Tanks.



OCD Personnel:

Picture 15:

Martyne Kieling, Santa Fe Ray Smith, Artesia

Treating Plant Tanks, Looking Southeast

Tank jacked up, valve open, tank contents drained onto ground. Bird nest on catwalk

ind liest off catwark



OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia Picture 14: Treating Plant Tanks, Looking East

Brine leak from pipeline.



OCD 711 Facility:
Inspection Date:
OCD Personnel:

ate: August 27, 1997
nel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 1: Treating Plant Tanks, Looking East South East

A.L. Daugherty, White Lake Disposal

Tank jacked up, valve open, tank contents drained onto ground.



Sec M TSS R Z9 F Sec 19, 785, 8 30 E Croshy Soult Like See 34 + 85 R24 E Francis S. Salingion May 16, 1995 2000 Mar Soe Kichna Rugar Anderson

AL Dave herety



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Sec 19, T&S, R29 E Sec 19, TSS, R30 E Crosby Salt lake
Frakes S. Seeligson / AL Daughterty May 18, 1998

OCD Martyne Kieling Roger Anderson

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Sec. 19, TOS, Rage Scc 19, TOS, Rage Scc 24, TOS, Rage CROSBY SALTLAKE

CROSBY SALT LAKE
FRATES S. SEELIBSON / AL DAUGHERA

MAY 18, 1998 OCD MARTYNE MIELING ROBER ANDERSON

AL. DAUGHERTY



OCD 711 Facility: A.L. Daugherty, White Lake Disposal Inspection Date: August 27, 1997 OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 9:

Former Treating Plant spills/ discharge pathway to Playa, Looking Southeast

Oil contaminated soil center of photo in dark green plants.



A.L. Daugherty, White Lake Disposal OCD 711 Facility: August 27, 1997 Inspection Date:

Martyne Kieling, Santa Fe OCD Personnel:

Ray Smith, Artesia

Oil contaminated soil next to Treating Plant Tanks, Picture 6: Oily soil dead bird in center of photo.



OCD 711 Facility: A.L. Daugherty, White Lake Disposal

Oily soil with hoof prints, large dead bird in center of photo.

Inspection Date: August 27, 1997 OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia

Picture 5: Oil contaminated soil next to Treating Plant Tanks,



A.L. Daugherty, White Lake Disposal OCD 711 Facility: August 27, 1997 Martyne Kieling, Santa Fe

Inspection Date: Ray Smith, Artesia OCD Personnel:

Oil contaminated soil next to Treating Plant Tanks, Oily soil with hoof prints, large dead bird in center of photo. Picture 4:



OCD 711 Facility: Inspection Date:

August 27, 1997 OCD Personnel:

Martyne Kieling, Santa Fe Ray Smith, Artesia

A.L. Daugherty, White Lake Disposal

dead rodent bottom right.

Oil contaminated soil next to Treating Plant Tanks, Oily soil with hoof prints, dead bird in center of photo,

Picture 3:



OCD 711 Facility: A.L. Daugherty, White Lake Disposal Inspection Date: August 27, 1997

onto ground

OCD Personnel: Martyne Kieling, Santa Fe

Ray Smith, Artesia Picture 2:

Treating Plant Tanks, Looking East North East Tank jacked up, valve open, tank contents oil/bottoms/water drained



A.L. Daugherty, White Lake Disposal OCD 711 Facility: August 27, 1997

Inspection Date: Martyne Kieling, Santa Fe OCD Personnel:

Ray Smith, Artesia Picture 7:

Treating Plant Tanks, Looking Northwest Oil contaminated soil next to Treating Plant Tanks,

_ 				
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FRATES SEELIGSON

4040 Broadway - Suite 510 San Antonio, TX 78209

> Telephone 210-826-5645 Fax 210-826-5689

April 9, 1998

Ms. Martyne J. Kieling, Environmental Geologist New Mexico Energy, Minerals & Natural Resources Dept. Oil Conservation Division 2040 South Pacheco Street Santa Fe, NM 87505

> RE: \$25,000 Bond for Commercial Surface Waste Disposal facility Fireman's Fund Ins. Co., Surety Bond No. 111 3268 3654 Your Letter of 3/30/98

Dear Ms. Kieling:

Once you have a date certain when you wish to visit the Chaves County property, please let me know. We will help set up a meeting with A. L. Daugherty, former foreman of White Lake Ranch. If you wish to contact Mr. Daugherty directly, please call him at 505-625-1867 in Roswell. In addition, I will write the new owner of the ranch notifying him of what we would like to do.

Best regards,

Trates Seeligson

Telephone Personal	
Originating Party Fusher Ceffnes	Other Parties
Frates Seeligson 210-826-5	
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Subject AL Danightory Trenting Flori	
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	to The New Land Guneria
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	Company Representative on Site.
Conclusions or Agreements	
West For For Wi	h # Phone
<u>Distribution</u>	Signed Martyn J. High.

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

March 30, 1998

CERTIFIED MAIL RETURN RECEIPT NO. P-326-936-413

Ms. Cindy Ash
Fireman's Fund Insurance Companies
P.O. Box 2519
Dallas, TX 75221

RE:

\$25,000 Bond for Commercial Surface Waste Disposal facility

Frates S. Seeligson., Principal

Section 19, T 8 S, R 30 E; Section 24, T 8 S, R 29 E; and Section 19, T 8 S, R 29 E, NMPM,

Chaves County, New Mexico

Fireman's Fund Insurance Co., Surety

Bond No. 111 3268 3654

Dear Ms. Ash:

The New Mexico Oil Conservation Division (OCD) received the Fireman's Fund Insurance Company letter on March 23, 1998. The above referenced letter requested that the OCD cancel the Surface Waste Disposal Bond No. 111 3268 3654. Cancellation of the bond is conditional upon compliance with all applicable statutes of the State of New Mexico and all rules, regulations and orders of the OCD, and upon clean-up of the facility site to standards of the OCD.

The Frates S. Seeligson surface waste disposal facility was inspected on August 27, 1997 by OCD personnel. The facility site requires additional clean-up to meet OCD standards. Since the activities/operations giving rise to the needed cleanup have already been conducted the subject bond will remain in full force and effect until the required clean-up is performed and closure of the facility is approved by the OCD.

If you have any questions please call me at (505) 827-7153

Sincerely,

Martyne J. Kieling

Environmental Geologist

Murtym May

xc:

Artesia District Office

Frates S. Seeligson, 4040 Broadway, Suite 510, San Antonio, Texas 78205



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD

MEMORANDUM

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87504 (505) 827-5800

TO:

ALL COMMERCIAL SURFACE DISPOSAL FACILITIES

FROM:

WILLIAM J. LEMAY, Director

Oil Conservation Division

SUBJECT:

DOCUMENTATION REQUIRED FOR ACCEPTANCE OF WASTE

DATE:

APRIL 2, 1993

The Oil Conservation Division (OCD) has issued a number of Rule 711 permits for commercial surface disposal facilities which allow the facilities to accept certain types of wastes. The OCD has not previously listed the documentation that should accompany all waste accepted at these facilities. Attached is a list of the documentation to accompany any waste accepted by an OCD-permitted commercial disposal facility. Listed are the certifications and tests required for the various classifications of waste. Also attached is a list of the oil and gas wastes exempted from EPA "hazardous waste" classification.

This documentation provides protection from hazardous waste regulations for the waste generator, transporter and disposal facility and facilitates OCD oversight. Please note that certain types of non-oilfield wastes can also be accepted by a disposal facility under its OCD Rule 711 permit. The OCD is currently in the process of developing an information form to accompany each load of waste received at a disposal facility. Until that form is finalized, each facility may develop and use its own forms and shall retain these records at the facility.

If you have any questions regarding the technical aspects of the documentation needed, please call Roger Anderson at 505/827-5812.

DOCUMENTATION REQUIRED TO ACCEPT WASTES COMMERCIAL SURFACE DISPOSAL FACILITIES

(April 1, 1993)

- 1. <u>Exempt Oilfield Waste</u>: A "Certification of Waste Status" signed by a corporate official of the waste generator certifying that the wastes are generated from oil and gas exploration and production operations and are exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations.
- 2. <u>Exempt. Non-Oilfield Waste</u>: A "Certification of Waste Status" signed by the New Mexico Environment Department (NMED) or the appropriate regulatory agency for non-oilfield wastes which are exempt from RCRA Subtitle C regulations. Acceptance is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district office.
- 3. Non-exempt, Non-hazardous Waste from OCD Permitted Facilities: The analytical results of *Hazardous Waste Characterization. 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 a corporate official that there has been no change in the processes employed or the chemicals stored/used at the facility generating the waste. Acceptance is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district office.
- 4. Non-Exempt, Non-hazardous, Non-Oilfield Waste: The analytical results of *Hazardous Waste Characterization and a "Certification of Waste Status" certifying the non-hazardous classification of the wastes signed by the NMED or appropriate regulatory agency. Acceptance of waste is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district.
- 5. <u>Hazardous Waste</u>: At no time will wastes which are hazardous by either listing or testing be accepted at an OCD permitted disposal facility.
 - * Includes 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.

NOTES:

1. As of September 25, 1990, any facility disposing of 1.1 tons or more of non-exempt waste per month with benzene as a constituent (e.g. oily liquid or solids, or aromatic wastes) is disposing of hazardous waste if, after testing, benzene levels of liquids, and of liquid leachate from solids are above 0.5 milligrams per liter (equivalent to 500 parts per billion). Benzene is a naturally occurring constituent of crude oil and refined product (especially gasoline), and is also used as a cleaning solvent. (Other types of solvents and chemicals have been subject to hazardous waste rules for several years.)

As of March 29, 1991, facilities disposing of between 0.11 and 1.1 tons of non-exempt waste per month became subject to the same rules. Regulation of such facilities is the responsibility of either the US Environmental Protection Agency or the New Mexico Environment Department (dependent on jurisdiction transfer from USEPA).

The reflowing OCD regulated facilities, especially, may be subject to hazardous waste rules for disposal of wastes and contaminated soils containing penzene:

- Oil and gas service companies having wastes such as vacuum truck, tank, and drum ringule from trucks, tanks and drums transporting or containing non-exempt waste.
- Crude oil treating plants and crude tank bottom reclaimers using benzene solvent, or liquids containing benzene as cleaning solutions.
- Transportation pipelines and mainline compressor stations generating waste, including waste deposited in transportation pipeline-related pits.

Source: Federal Register, Thursday, March 29, 1990, p.11,798 - 11,877.

- 2. In April, 1991, EPA clarified the status of oil and tank bottom reclamation facilities:
 - A. Those wastes that are derived from the processing by reclaimers of only exempt wastes from primary oil and gas field operations are also exempt from the hazardous waste requirements. For example, wastes generated from the process of recovering crude oil from tank bottoms are exempt because the crude storage tanks are exempt.
 - B. Those reclaimer wastes derived from non-exempt wastes (eg. reclamation of used motor oil, refined product tank bottoms), or that otherwise contain material which are not uniquely associated with or intrinsic to primary exploration and production field operations would not be exempt. An example of such non-exempt wastes would be waste solvent generated from the solvent cleaning of tank trucks that are used to transport oil field tank bottoms. The use of solvent is neither unique nor intrinsic to the production of crude oil.

Source: EPA Office of Solid Waste and Emergency Response letter opinion dated April 2, 1991, signed by Don R. Clav. Assistant Administrator.

EPA WASTE CLASSIFICATION O & G EXPLORATION AND PRODUCTION WASTES*

Oil and Natural Gas Exploration and Production Materials and Wastes Exempted by EPA from Consideration as "Hazardous Wastes" (provided non-exempt waste which is or may be "hazardous" has not been added):

- Produced water:
- . Drilling fluids;
- Drill cuttings;
- Rigwash:
- Drilling fluids and cuttings from offshore operations disposed of onshore:
- . Geothermal production fluids;
- Hydrogen sulfide abatement wastes from geothermal energy production:
- . Well completion, treatment, and stimulation fluids:
- . Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste:
- . Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments;
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes;
- . Workover wastes:
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves;
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge;
- . Cooling tower blowdown;

- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste steam);
- Packing fluids;
- Produced sand:
- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation;
- Hydrocarbon-bearing soil;
- . Pigging wastes from gathering lines;
- Wastes from subsurface gas storage and retrieval, except for nonexempt wastes listed below;
- Constituents removed from produced water before it is injected or otherwise disposed of;
- Liquid hydrocarbons removed from the production stream but not from oil refining;
- Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons;
- Materials ejected from a producing well during the process known as blowdown;
- . Waste crude oil from primary field operations and production:
- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment;
- Liquid and solid wastes generated by crude oil and crude tank bottom reclaimers***.

- Materials and Wastes Not Exempted (may be a "hazardous waste" if tests or EPA listing define as "hazardous") **:
- Unused fracturing fluids or acids:
- . Gas plant cooling tower cleaning wastes;
- . Painting wastes;
- Oil and gas service company wastes, such as empty drums. drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids;
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste;
- . Refinery wastes;
- Liquid and solid wastes generated by refined oil and product tank bottom reclaimers***:
- . Used equipment lubrication oils:
- . Waste compressor oil, filters, and blowdown;
- . Used hydraulic fluids;
- . Waste solvents:
- . Waste in transportation pipelinerelated pits:
- . Caustic or acid cleaners:
- . Boiler cleaning wastes:
- . Boiler refractory bricks;
- . Boiler scrubber fluids, sludges, and ash:
- . Incinerator ash;
- . Laboratory wastes;
- Sanitary wastes;
- . Pesticide wastes:
- . Radioactive tracer wastes:
- . Drums, insulation, and miscellaneous solids.

Source: Federal Register, Wednesday, July 6, 1988, p.25,446 - 25,459.

^{**} See important note on 1990 disposal restrictions for non-exempt waste on reverse.

^{***} See reverse side for explanation of oil and tank bottom reclaimer listings.



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS

March 1, 1990

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

Mr. Frates S. Seeligson 1604 NBC Building San Antonio, Texas 78205

Re: \$25,000 Bond for Commercial Surface
Waste Disposal Facilities
Frates S. Seeligson, Principal

Bond No. 111 3268 3654

Dear Mr. Seeligson:

We have corresponded with you previously requesting a rider to your bond giving the location of your facility as:

Section 19, T-8-S, R-30-E Section 24, T-8-S, R-29-E and Section 19, T-8-S, R-29-E, all in Chaves County, New Mexico.

We have not yet received that rider as requested.

You are hereby directed to file the rider with Diane Richardson, Administrator of the OCD Bond Department, at the letterhead address not later than 3:00 p.m. on March 9, 1990.

If you fail to file the rider as required, you will immediately cease operations at the facility and begin reclamation. Your failure to comply with this directive will result in a civil assessment being made against you, and each day of violation will be considered a separate offense for which a separate assessment will be assessed.

Sincerely,

WILLIAM J. LEMAY

Director

WJL/RGS/dr

Submit

Copies to Appropriate District Office

DISTRICTI

State of New Mexico 1, Minerals and Natural Resources Departm Form C-134 Aug. 1, 1989

P.O. Box 1980, Hobbs, NM 88241-1980

OIL CONSERVATION DIVISION REGEIVED P.O. Box 2088

DISTRICT II P.O. Drawer DD, Artesia, NM 88211-0719

Santa Fe, New Mexico 87504-2088 89 007 13 PMm 9 N2

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

(For Division Use Only)

APPLICATION FOR EXCEPTION TO	DIVISION ORDER R-89	52
------------------------------	---------------------	----

FOR PROTECTION OF MIGRATORY BIRDS Rule 80	(b), Rule 105(b), Ru	le 312(h), Ru	le 313,	or Rule	711(I)
Operator Name: A.L. Dougherty	**************************************				
Operator Address: HCR 31 Roswell, New	v Mexico 88210				
_ease or Facility Name Crosby_Salt_Lake	Location		19	8S	29E
Size of pit or tank: Approximately 80 Acres		Ut. Ltr.	Sec.	.qwT	Rge
Operator requests exception from the requirement to screen, net o	or cover the pit or tank	at the above-c	describe	ed facility	
X The pit or tank is not hazardous to migratory waterfowl.	Describe completely th	e reason pit is	non-ha	zardous.	
The lake is kept free of oil.		·			
1) If any oil or hydrocarbons should reach this facility	give method and time	required for re	moval:		
If any oil or hydrocarbons r	each the lake,				
clean up will begin immediat	ely.				
 If any oil or hydrocarbons reach the above-describ appropriate District Office of the OCD with 24 hour 		r is required to	notify th) 0	
Operator proposes the following alternate protective mea	ISUres:				

CERTIFICATION BY OPERATOR: I hereby certify that the infonknowledge and belief.	mation given above is	Irue and comp	lete to t	the best	of my
	Operator	D-1-			
Signature G. A. New etc. Title		Date	657	······································	
Printed Name A.L. Dougherty	Telephone No	(303) 023 2	.037		
سين ندره رسيد منس هيده هيدم مارس بادره سده هدمه هيده ودين هيده ودين هيده ودين هيده ودين ودين ودين ودين					
FOR OIL CONSERVATION DIVISION USE		20.1	, , .		
Date Facility Inspected 8/22/89	Approved by	ThRel		hom	~
Inspected by $m\omega + Js$	Approved by	1)157 5	MORI	U150	
	Date	9/20/8	9		



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

February 21, 1989

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-106 675 481

Mr. A. L. Daugherty Clovis Star Route Roswell, New Mexico 88210

RE: Crosby Salt Lake Disposal Facility
Chaves County, New Mexico

Dear Mr. Daugherty:

Commercial surface waste disposal facilities in New Mexico are now regulated by Oil Conservation Division (OCD) Rule 711 (enclosed). This rule, which became effective June 6, 1988, outlines specific information required by the OCD to permit commercial surface disposal facilities. Although your operations were permitted by the Division through a hearing process, certain information now required by Rule 711 must be supplied by you in order for them to come into compliance with the new rule. Both of your tank facilities (Section 19, Township 8 South, Range 29 East and Section 19, Township 8 South, Range 30 East) that discharge into Crosby Salt Lake will be treated as one facility for permitting and bonding purposes. Both facilities shall be addressed in the below requirements.

The following information must be furnished to the OCD within 120 days of receipt of this letter:

1. Principals

Supply the names, phone numbers and addresses of all owners and the official contact person for the permitted facility.

2. Description

Supply descriptions of the facilities including detailed diagrams of all fences, cattleguards, pits, dikes, piping, and tanks. Include in your description the security measures that are in place or will be instituted to prevent any unauthorized disposal at the facilities.

3. Contingency Plan

Submit a contingency plan for reporting and clean up of any spills, leaks or releases.

4. Maintenance

Submit a routine inspection and maintenance plan to ensure permit compliance. Include the inspection frequency and maintenance of all berms, pits, tanks, piping, water levels and siphons.

Mr. A. L. Daughterty February 21, 1989 Page 2

5. Closure Plan

Submit a plan for closure of the facility. The plan should include, but is not limited to the removal of fluids and chemicals, backfilling of pits, disposition of contaminated soils, disposition of buildings, tanks, vessels, equipment or hardware, and general reclamation and restoration of the site to as close to its original condition as practical.

6. Affidavit

Certification by an authorized representative that information submitted is true, accurate, and complete to the best of the applicants knowledge.

Public Notice requirements were fulfilled through the hearing process, so no additional public notice is required.

If you have not already fulfilled the \$25,000 bond requirement or the annual status report, you must begin this process immediately.

District personnel in the Artesia District have inspection and enforcement authority within their district to ensure compliance with OCD Rule 711 and permit conditions placed on individual disposal facilities.

If you have questions, please do not hesitate to contact me at (505) 827-5884, or Mr. Mike Williams, Artesia District, at (505) 748-1283.

Sincerely,

Roger C. Anderson

Environmental Engineer

RCA/sl

Enclosure

cc: OCD Artesia Office

OCD Hobbs Office

CHECKLIST FOR COMPLIANCE WITH RULE 711

Facility Name and Mailing Address: @ROOK / TOPE - -- ---88210

Order No.: R-5464

Location: 24-85-27E + /9-87-30E

Contact Person: A.C. DAUS WERTY - FRATES SEELISCON, OF BANK A COMMERCE CO., SANAMA CHAS. F. WALONE, ATOM IN THE CONTRACT CONTRACTOR OF THE ASSETT SELECTIONS

Date of Review:

111

400

/ 1. Plat and topo maps showing location in relation governmental surveys and roads, watercourses, water wells and dwellings within one mile.

- 12. and addresses of Names facility site landowners landowners of record within one-half mile.
 - Description of facility with a diagram indicating location З. of fences and cattleguards, and detailed engineering construction/installation diagrams of pits, liners, dikes, piping, sprayers, and tanks.
- V4. Plan for disposal of approved waste solids or liquids.
 - 5. Contingency plan for reporting and cleanup of spills or releases.
 - 6. Routine inspection and maintenance plan.
- 7. Closure plan.
- /8. Geohydrological evidence that fresh water will not be affected.
 - 9. a. Proof that owners and occupants within & mile were notified.
 - b. OCD public notice.
 - 10. Affidavit of verification.
 - 11. Bond (required by 12/30/88 for current facilities).

REPORT TO:	DAVID BOYER	Sample No. <u>89033/1255</u>
	N.M. OIL CONSERVATION DIVISION	DATE REC.
	P.O. Box 2088	PRIORITY
	Santa Fe, NM 87504-2088	PHONE(S): / 827-5812
COLLECTION C	TTY:	; county: Chaves
COLLECTION D	ATE/TIME CODE: (Year-Month-Day-Hour-Minute) 29	013131/1/12551
LOCATION COL	DE: (Township-Range-Section-Tracts) #19/10/+1/8 1/8	+
	submitter: David Boyer	•
SAMPLE TYPE:	WATER X, SOIL , FOOD , OTHER:	
NP: P-Ice P-AA P-HCl ANALYSES REC Tequired. Whenev (753) Allipha (754) Aroms (766) Mass (766) Trihal (774) SDWA (775) SDWA	(75	sidual.
PIELD DATA:	WV50,000	•
	onductivity=umho/cm atC; Chlorine Residua	1=mg/l
Dissolved Oxygen		
Sampling Location Broke	1. Depth of well 1. Perforation Interval In, Methods and Remarks (i.e. odors, etc.) Iwnk (CROSby Salt) Lake - S Edule at Worth and Electrical Secretarians of the s	ample from the
activities.(signatus		ed of Shipment to the Lab:
CHAIN OF CUS		Tm
	is sample was transferred from	15 89 12 25
at (location)	onon	R Saals Invest: Ves C No C
Signatures	this block are correct. Evidentiary Seale: Not Sealed O	it Jeans Intest: 145 [] 170 []
For OCD	use: Date owner notified: 6/19/83	Dear CAST
FOR OCD	use: Date owner notified: $\nu / / / / / / / / / / / / / / / / / / $	rnone or Letter? Initials

Accu-Labs Research, Inc.

May 9, 1989 Page 15 of 18

Mr. David Boyer NM Oil Conservation Division

RE: 9649-29859-20

Date Samples Rec'd: 4-5-89 P.O. No. 77-521.07-123

MICHICED

MAY 1 7 1989

OIL CONSERVATION DIV. SANTA FE

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29859-20-16 8903301440 3-30-89	9649-29859-20-17 8903311255 3-31-89	9649-29859-20-18 8904032115 Trip Blank 4-3-89
GC/MS VOLATILE ORGANICS, μg	ı/L:		
Chloromethane	<10	<10	<10
Bromomethane	<10	<10	<10
Vinyl chloride	<10	<10	<10
Chloroethane	<10	<10	<10
Methylene chloride	<5	<5	<5
1,1-Dichloroethene	<5	<5	<5
1,1-Dichloroethane	<5	<5	<5
Total 1,2-Dichloroethene	<5	<5	<5
Chloroform 1,2-Dichloroethane 1,1,1-Trichloroethane Carbon tetrachloride	<5	<5	<5
	<5	<5	<5
	<5	<5	<5
	<5	<5	<5
Bromodichloromethane	<5	<5	<5
1,2-Dichloropropane	<5	<5	<5
c-1,3-Dichloropropene	<5	<5	<5
Trichloroethene	<5	<5	<5
Benzene Dibromochloromethane 1,1,2-Trichloroethane t-1,3-Dichloropropene	<5	<5	<5
	<5	<5	<5
	<5	<5	<5
	<5	<5	<5
2-Chloroethylvinyl ether	<5	<5	<5
Bromoform	<5	<5	<5
1,1,2,2-Tetrachloroethane	<5	<5	<5
Tetrachloroethene	<5	<5	<5

Accu-Labs Research, Inc.

May 9, 1989 Page 16 of 18

Mr. David Boyer NM Oil Conservation Division

RE: 9649-29859-20

Date Samples Rec'd: 4-5-89 P.O. No. 77-521.07-123

MAY 17 1989 OIL CONSERVATION DIV.

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29859-20-16 8903301440 3-30-89	9649-29859-20-17 8903311255 3-31-89	9649-29859-20-18 8904032115 Trip Blank 4-3-89
Determination: μg/L			
Toluene	<5	<5	<5
Chlorobenzene	<5	<5	<5
Ethyl benzene	<5	<5	<5
Total Dichlorobenzenes	<5	<5	· <5
Total Xylenes	<5	<5	<5





SCIENTIFIC LABORA ORGANIC ANALYSIS Organic Section - Ph	REQUEST FORM
REPORT TO: DAVID BOYER	\$9-3 8 C —
N.M. OIL CONSERVATION DIVIS	1 10 00
P.O. Box 2088	PRIORITY
Santa Fe, NM 87504-2088	PHONE(S): 827-5812
collection city: ROSCOPII - NEGC	
COLLECTION DATE/TIME CODE: (Year-Month-Day-Hour-Minut	
LOCATION CODE: (Township-Range-Section-Tracts) 2 8 5	^ / ^
USER CODE: 8 2 2 3 5 SUBMITTER: Day	
SAMPLE TYPE: WATER X , SOIL , FOOD , OTHER:	
This form accompanies Septum Vials, Glass Jugs, Samples were preserved as follows: NP: No Preservation; Sample stored at room temper of the proof of	ve chlorine residual. APR 2 7 1989 drops/40 ml) below to indicate the type of ChalGOMCENVATION DIV.
PIELD DATA: 44,000	
pH=; Conductivity=umho/cm atC; Ch	
Dissolved Oxygen= mg/l; Alkalinity= mg/l; Flow F	
Depth to waterft.; Depth of wellft.; Perforation	Intervalft.; Casing:
Sampling Location, Methods and Remarks (i.e. odors, etc.)	LVe (Rowl - Tomb Loke)
Sampling Location, Methods and Remarks (i.e. odors, etc.) Sample Sam Crocke Sall of end of peninsula, NE	LARE (NEORE MONE LARE)
I certify that the results in this block accurately reflect the results activities. (signature collector):	nults of my field analyses, observations and to local Method of Shipment to the Lab:
/	
CHAIN OF CUSTODY	
I certify that this sample was transferred from	
at (location)	on and that
the statements in this block are correct. Evidentiary Seals: Not	Sealed OR Seals Intact: Yes No No
Signatures	

For OCD use: Date owner notified: _____ Phone or Letter? Initials



ANALYSES PERFORMED

LAB. No.: OR-

THIS PAGE FOR LABORATORY RESULTS ONLY

This sample was tested using the analytical screen	ning method(s)	checked below:	
PURGEABLE SCREENS (753) Aliphatic Headspace (1-5 Carbons) (754) Aromatic & Halogenated Purgeables (765) Mass Spectrometer Purgeables		EXTRACTABLE SCREENS (751) Aliphatic Hydrocarbons (755) Base/Neutral Extractables	
(766) Trihalomethanes (774) SDWA VOC's I (8 Regulated +) (775) SDWA VOC's II (EDB & DBCP)		(758) Herbicides, Chlorophenoxy acid (759) Herbicides, Triazines (760) Organochlorine Pesticides (761) Organophosphate Pesticides	
Other Specific Compounds or Classes		(767) Polychlorinated Biphenyls (PCB's) (764) Polynuclear Aromatic Hydrocarbons (762) SDWA Pesticides & Herbicides	
ANA	ALYTICA	L RESULTS	
COMPOUND(S) DETECTED	CONC. [PPB]	COMPOUND(S) DETECTED	CONC. [PPB]
• DETECTION LIMIT • *		+ DETECTION LIMIT + +	
ABBREVIATIONS USED: N D = NONE DETECTED AT OR ABOVE T R = DETECTED AT A LEVEL BELOW [RESULTS IN BRACKETS] ARE UNCONF	THE STATE	D DETECTION LIMIT D DETECTION LIMIT (NOT CONFIRMED)	
LABORATORY REMARKS:			
CERTIFICAT	TE OF ANALY	TICAL PERSONNEL	
Seal(s) Not Sealed Intact: Yes No S I certify that I followed standard laboratory procedur that the statements on this page accurately reflect th	res on handling	and analysis of this sample unless otherwise noted	and
Date(s) of analysis: Analyst's sig	nature:		
I certify that I have reviewed and concur with the			block.
Reviewers signature:			

HEALTH AND NVIRONMENT DEPARTMENT

ITIFIC LABORATORY DIVISION

700 Camino de Salud, NE

Albuquerque, NM 87106 [505]-841-2500

ORGANIC CHEMISTRY SECTION [505]-841-2570

February 1, 1989

ANALYTICAL REPORT SLD Accession No. OR-89-0038

Distribution (Submitter (X) SLD Files

NM Oil Consv. Div. To:

State Land Office Bldg.

P. O. Box 2088

Santa Fe, NM 87504-2088 From:

Organic Chemistry Section

Scientific Laboratory Div.

700 Camino de Salud, NE

Albuquerque, NM 87106

A purgeable water sample submitted to this laboratory on January 19, 1989 Re:

User:

OIL CONSERVATION DIV

State Land Office Bldg.

P. O. Box 2088

Santa Fe, NM 87504-2088

DEMOGRAPHIC DATA

COLLECTION LOCATION On: 12-Jan-89 *By:* Boy . . . Township: 08S Section: 19 At: 11:15 hrs. In/Near: Roswell Range: 30E Tract: 133

ANALYTICAL RESULTS: Aromatic & Halogenated Purgeable Screen

Parameter	Value	Note	MDL	Units
Aromatic Purgeables (6)	0.00	N	12.50	ppb
Halogenated Purgeables (33)	0.00	N	12.50	ppb
Notations & Comments:				
MDL = Minimal Detectable Level.				

A = Approximate Value; N = None Detected above Detection Limit; P = Compound Present, but not quantified;

T = Trace (< Detection Limit); U = Compound Identity Not Confirmed.

Laboratory Remarks: Crosby Salt Lake- North End

Analyst:

Gary C. Æden

Analyst, Organic Chemistry

Seals: Not Sealed , Intact: No , Yes & Broken By:

Analysis Date

Reviewed By:

Richard F. Meyerhein

Supervisor, Organic Chemistry Section



New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106 — (505) 841-2555

W III GENERAL WATER CHEMIS

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED /	19 89 1	18 WC-93	USER 59300	59600 XX O	THER: 822	235			
Collection DATE		SITE INFORM- ► ATION	Sample location	oshy Satt	,	BROKO Tent			
Collected by — Person/Ac	gency Ande	2001/OCD	Collection site description	N Side	0720	be a Tendo of			
SEND N FINAL S REPORT TO S Attn:	NVIRONMENT IM OIL CONS Itate Land Santa Fe, N David Boy e: 827-58	TAL BUREAU SERVATION DIA Office Blag NM 87504-208	120 BBX 2086	ION DIVISION	Spire	17,7/5ula 35-30E-19,133			
SAMPLING CON	DITIONS D Pump	Water level		Discharge]	Sample type /			
Ø≯Dipped	□ Тар					Grale			
pH (00400)		Conductivity (Unco	A 40	Water Temp. (00010)	-3 °C	Conductivity at 25°C (00094) µmho			
SAMPLE FIELD	SAMPLE FIELD TREATMENT — Check proper boxes								
No. of samples submitted	/ JE NF	Whole sample (Non-filtered)	☐ F : Filtered in 0.45 µmer	field with A; 2 Abrane filter	ml H₂SO₄/	L added			
NA: No acid	dadded 🗆 C	other-specify:	□ A:	$5m1$ conc. \mathtt{HNO}_3 ad	ded □A	4: $4m1 \text{ fuming HNO}_3 \text{ added}$			
ANALYTICAL R	ESULTS from								
NA Conductivity (C	orrostod)		Units Date analyzed	From <u>NF</u> , 1	NA Sample	: Date : Analyzed			
25°C (00095) □ Total non-filteral residue (susper (00530) □ Other: □ Other:		22430 5.45	mg/l	Calcium Potassium Magnesium Sodium Bicarbonate	1371 21,10 3300	mg/1 1/26/84 10 mg/1 1/24 20 mg/1 1/26/89 mg/1 1/24			
A-H ₂ SO ₄				Chloride	261 200	——————————————————————————————————————			
 □ Nitrate-N + , Nit total (00630) □ Ammonia-N total □ Total Kjeldahl-N () □ Chemical oxygedemand (00340) 	al (00610)		mg/l mg/l mg/l	Sulfate Total Solid	21	○ mg/1 → 16 := := := := := := := := := := := := :=			
☐ Total organic ca ()	rbon 		mg/l	- A Cation/Ar	nion Bal	lance			
☐ Other: ☐ Other:				Analyst	Date R	eported Reviewed by			
Laboratory remarks	3				<u> </u>				
201200									
FOR OCD USE	Date C	wner Notif i €	ed	Phone or Lette	er?	Initals			

. •	CATIONS		DET.		ANIONS		DET.
ANALYTE	MEQ.	PPM	LIMIT	ANALYTE	MEQ.	PPM	LIMIT
Ca Mg Na K		62650.00 21100.00 33000.00 13710.00	<3.0 <0.3 <10.0 <0.3	SO4		359.00 210.00 ######## >20000	<1.0 <10.0 <5.0
Mn Fe	0.00	0.00	 	CO3 NH3	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	< 0. < 1. < 0. < 0.
SUMS	6645.35	130460.00	! 		7378.38	########	<u> </u>
	Dissolved	No. =	= 890093				



New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106

HEAVY METAL ANALYSIS FORM Telephone: (505)841-2553

Date	1 1 10 001	Lab	User			
Received		No. + CP-13	Code	<u>□</u> ∠822		ther:
COLLECTION	DATE & TI	ME: YY mm	dd hh n	nm		SITE DESCRIPTION
		18901	12/1//	<u></u>	Crosby	Salt Lake (Brok
COLLECTED	BY:∠,	1. 0	10-1			Tan/ Lake
	BOUL	7/ AUXION	SI			, . ,
	1/	1/	. 3 - 37 C	ME IO		
TO:	V	Land Carlo	1:-1111		OWNER:	
		سمسطن فينمسين	ar armini imili 	- · • • • • • • • • • • • • • • • • • •		
		1 1 1 1	ing La Am			
ENVIRO	NMENTAL BU	REAU		ALC:	SITE LOCAT	
NM OIL	CONSERVAT	ION DIVISIO	N	TOWN: All	County:	the ves
State	Land Offic	e Bldg., Po	Box, 208	88		
SANTA	FE, NM 8	7504-2088	Physical res	•	Township, Range,	Section, Tract: (10N06E24342)
	8 42	a 1			085+3	310至+19+113131
ATTN:	b. Boyo					
TELEPH	ONE: 827-5	812	STATIO	ON/ WELL (CODE:	
_	·					
			E, LONG	TUDE:		
SAMPLING C						
☐ Bail	<u> </u>	-	Level:	Discha	arge:	Sample Type:
Dipp]		122019
pH(00400)	Conductiv	ity(Uncorr.) Water	Temp. (0		ductivity at 25°C
()	1	1 000		5.8 %	(00	0094)
	7	1,800 jumho		3.0 c		umho_
FIELD COMM	· -				2	
	umple	From 1/2	enins	ala IV	, Side	· · · · · · · · · · · · · · · · · · ·
				. /	7.	
SAMPLE FIE				LAB ANA	LYSIS REQUI	ESTED:
	per boxes:					
WPN:		WPF: Wa			AP Scan	
Preserved	w/HNO3	Preserved w	$\lambda HN0^3$	ſ		metal if AA
Non-Filte	red	Filtered		is re	quired.	
		A NI A I V/T !	CAL DE	SILL TO 1	NAC /1)	
		ANALYTIC			MG/L)	
ELEMENT	ICAP VALU	DE AA VA	TOE	ELEMEN		
Aluminum	<1.0			Silico		:1.0
Barium	< 1.0			Silver		:1.0
Beryllium	< 1.0	_		Stront		
Boron	210.			Tin	8.2	
Cadmium	< 1.0	🛛	[Vanadi		(1.0
Calcium	49100.			Zinc .		1.0
Chromium	<1.0			Arseni		∑; <0.5
Cobalt	< 0.5	<u> </u>		Seleni		<u> </u>
Copper	< 1.0			Mercur	У	X. (0,000
Iron	< 1.0					
Lead	<1.€	<u> </u>				Ц
Magnesium	17500.		.			<u> </u>
Manganese	2.3					
Molybdenum						닏
Nickel	<1.0	<u> </u>				
		<u> </u>				
LAB COMMEN	TS:					DIGEST
For OCD Us				Λ	.A	. (IV /a)
Date Owner			ICAP An	alyst <u>//</u>	<u>/+ </u>	iewer flux Ju
Phone	or Letter?	?		([-])	-60	2/15/10
	Initials:		Date Ana	alyzed 2/2	27/89 Date	e Reveived 1/10/8

CROSBY Sattlake

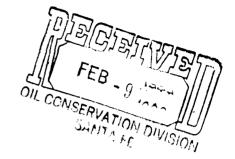
Accu-Labs Research, Inc.

11485 W. 48th Avenue Wheat Ridge, Colorado 80033 (303) 423-2766

February 7, 1989 Page 1 of 2

Mr. David Boyer NM Oil Conservation Division State Land Office Bldg. P.O. Box 2088 Santa Fe, NM 87504-2088

RE: 9649-29142-3 Date Samples Rec'd: 1-20-89 P.O. No. 77-521.07-123



REPORT OF ANALYSIS

ALR Designation Sponsor Designation Determination: mg/L	9649-29142-3-1 8901121115 1-12-89	9649-29142-3-2 8901121645 1-12-89	9649-29142-3-3 8901131205 1-13-89
Aluminum, total Barium, total Boron, total Cadmium, total Calcium, total Chromium, total Iron, total Lead, total Magnesium, total	<1.0* 3.0 190 <0.05* 64,000 <0.05* <0.1* <0.5* 21,000	<1.0* 10 38 <0.05* <0.05* 7.4 <0.5*	<1.0* 0.6 8.2 <0.05* 8900 <0.05* 210 <0.5* 1400
Manganese, total Mercury, total Potassium, total Sodium, total Total Alkalinity, (as CaCO3 to pH 4.5)	4.3 0.0072 12,000 34,000	3.8 0.0060 	5.2 0.0060 1100 47,000
Carbonate (as CO ₃) Bicarbonate (as HCO ₃) pH Specific Conductance, µmhos/cm Arsenic, total	<5 340 5.5 900,000 0.24	 0.13	<5 210 7.0 340,000 2.4
Selenium, total Total Solids Bromide	<0.25* 540,000 2000	<0.25* ENROM Biller lakes	200,000 310
	(Rond)	Biller lakes	of Disposer

Accu-Labs Research, Inc.

February 7, 1989 Page 2 of 2

Mr. David Boyer NM Oil Conservation Division

RE: 9649-29142-3

Date Samples Rec'd: 1-20-89 P.O. No. 77-521.07-123

REPORT OF ANALYSIS

ALR Designation Sponsor Designation	9649-29142-3-1 8901121115 1-12-89	9649-29142-3-2 8901121645 1-12-89	9649-29142-3-3 8901131205 1-13-89
Determination: mg/L			
Chloride	230,000		110,000
Sulfate (as SO ₄)	240		770
Ion Balance	103		85

^{*} Higher detection limit due to sample matrix interference.

These samples are scheduled to be discarded 30 days after the date of this report.

Mary Fabisiak Water Laboratory

Supervisor

MF/dh ∠ >



SCIENTIFIC LABORATORY DIVISION

754 wpu

ORGANIC ANALYSIS REQUEST FORM Organic Section - Phone: 841-2570

	======================================
REPORT TO: DAVID BOYER	S.L.D. No. OR-
N.M. OIL CONSERVAT	1-10-50
P.O. Box 2088	PRIORITY 3
Santa Fe, NM 87504	
	ELC: 14; COUNTY: CHANES
COLLECTION DATE/TIME CODE: (Year-Month-D	
) 0 8 5 + 2 9 5 + 2 4 + 2 - 1 (10N06E24342) by 1/10
	CR: David Boyer CODE: 2 6 0 Lex
SAMPLE TYPE: WATER [, SOIL , FOOD	-
This form accompanies Septum Vials, Samples were preserved as follows: NP: No Preservation; Sample stored as P-Ice Sample stored in an ice bath (No Preserved with Ascorbic	Glass Jugs, and/orat room temperature.
PIELD DATA: >50,000	
pH=; Conductivity=umho/cm at _	C; Chlorine Residual=mg/l
Dissolved Oxygen=mg/l; Alkalinity=	_mg/l; Flow Rate
Depth to waterft.; Depth of well	
Sampling Location, Methods and Remarks (i.e. odo	rs, etc.) at lake NOBIH
hallony Chaches	erex pipe from tank tank
O = O	reflect the regults of my field analyses, observations and
activities.(signature collector):	Bay Method of Shipment to the Lab: State (12)
CHAIN OF CUSTODY	/ /
I certify that this sample was transferred from	to
at (location)	on and that
the statements in this block are correct. Evidentia	ry Seals: Not Sealed OR Seals Intact: Yes No
Signatures	

For OCD use: Date owner notified: 19/84 Phone or Letter? Initial



ANALYSES PERFORMED

LAB. No.: OR-

THIS PAGE FOR LABORATORY RESULTS ONLY

This sample was tested using the analytical screen	ning method(s) checked below:	
PURGEABLE SCREENS		EXTRACTABLE SCREENS	
[(753) Aliphatic Headspace (1-5 Carbons)		(751) Aliphatic Hydrocarbons	
(754) Aromatic & Halogenated Purgeables		(755) Base/Neutral Extractables	
(765) Mass Spectrometer Purgeables		(758) Herbicides, Chlorophenoxy acid	
(766) Trihalomethanes		· · · · · · · · · · · · · · · · · · ·	
		(759) Herbicides, Triazines	
(774) SDWA VOC's I (8 Regulated +)		(760) Organochlorine Pesticides	
[(775) SDWA VOC's II (EDB & DBCP)		(761) Organophosphate Pesticides	
Other Specific Compounds or Classes		(767) Polychlorinated Biphenyls (PCB's)	
		(764) Polynuclear Aromatic Hydrocarbons	
		[(762) SDWA Pesticides & Herbicides	
ANA	ALYTIC	AL RESULTS	
COMPOUND(S) DETECTED	CONC.	COMPOUND(S) DETECTED	CONC.
COMICOND(S) DETECTED	[PPB]	COMIT COND(S) DEFECTED	[PPB]
	1		
· · · · · · · · · · · · · · · · · · ·			
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·	}		1
* DETECTION LIMIT * *		+ DETECTION LIMIT + +	
* DETECTION LIMIT * *	Lf	+ DETECTION EIMIT + 1	
ABBREVIATIONS USED:			
N D = NONE DETECTED AT OR ABOVE			
T R = DETECTED AT A LEVEL BELOW			
[RESULTS IN BRACKETS] ARE UNCONF	IRMED AND	OR WITH APPROXIMATE QUANTITATION	
LABORATORY REMARKS:			
CEDTIFICAT	DE OF ANAL	VTICAL DEDCONNEL	
CERTIFICAT	E OF ANAL	YTICAL PERSONNEL	•
Seal(s) Not Sealed Intact: Yes No No Sealed Intact: Yes No			
I certify that I followed standard laboratory procedur	es on handlir	ng and analysis of this sample unless otherwise noted	and
that the statements on this page accurately reflect th	ne analytical	results for this sample.	
Date(s) of analysis: Analyst's sig	nature:		
I certify that I have reviewed and concur with the	analytical resu	ults for this sample and with the statements in this	block.
Reviewers signature:			

SCIENTIFIC LABORATORY DIVISION

700 Camino de Salud, NE

Albuquerque, NM 87106 [505]-841-2500

ORGANIC CHEMISTRY SECTION [505]-841-2570

February 1, 1989

ANALYTICAL REPORT SLD Accession No. OR-89-0043

Distribution

() Submitter

(X) SLD Files

To: NM Oil Consv. Div.

State Land Office Bldg.

P. O. Box 2088

Santa Fc, NM 87504-2088 From: Organic Chemistry Section

Scientific Laboratory Div.

700 Camino de Salud, NE

Albuquerque, NM 87106

A purgeable water sample submitted to this laboratory on January 19, 1989 Re:

User:

OIL CONSERVATION DIV

State Land Office Bldg.

P. O. Box 2088

Santa Fe, NM 87504-2088

DEMOGRAPHIC DATA

Co	OLLECTION	LOCATION		
On: 12-Jan-89	<i>By:</i> Boy	Township: 08S	Section: 24	
At: 11:05 hrs.	In/Near: Roswell	Range: 29E	Tract: 2	

ANALYTICAL RESULTS: Aromatic & Halogenated Purgeable Screen

Parameter	Value	Note	MDL	Units
Halogenated Purgeables (33)	0.00	N	100.00	ppb
Benzene	2450.00		100.00	ppb
Toluene	1700.00		100.00	ppb
Ethylbenzene	220.00		100.00	ppb
p- & m-Xylene	300.00		100.00	ppb
l,2-Dimethylbenzene	0.00	${f T}$	100.00	ppb

Notations & Comments:

MDL = Minimal Detectable Level.

A = Approximate Value; N = None Detected above Detection Limit; P = Compound Present, but not quantified;

T = Trace (<Detection Limit); U = Compound Identity Not Confirmed.

Seals: Not Sealed ; Intact: No , Yes & Broken By: _

Laboratory Remarks: Crosby Salt Lake

Analyst: Gary C/Eden

Analyst, Organic Chemistry

21/89 Reviewed By: Analysis

Date

Richard F. Meyerhein

Supervisor, Organic Chemistry Section



New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106 — (505) 841-2555

FOR OCD USE -- Date Owner Notified

859r



Albuquerque, NM 87106 — (505) 841-2555 TXX OTHER: 82235 59600 59300 SITE INFORM-ATION /0CD ENVIRONMENTAL BUREAU NM OIL CONSERVATION DIVISION SEND FINAL State Land Office Bldg, PO 104 2 REPORT Santa Fe, NM 87504-2088 TO MAR = 1 1865 Attn: David Bover Phone: 827-5812 OIL CONSERVATION DIVISION well code SANTA FE **SAMPLING CONDITIONS** □ Bailed Pump Water level Discharge □ Dipped ĭ**⊠**Ç Tap pH (00400) Conductivity at 25°C (00094) Conductivity (Uncorrected) Water Temp. (00010) °C > 50 990 µmho umho Field comments SAMPLE FIELD TREATMENT — Check proper boxes Filtered in field with No. of samples Whole sample ÆNF: ☐ A: 2 ml H₂SO₄/L added submitted (Non-filtered) 0.45 µmembrane filter \square A: 4ml fuming HNO₃ added ⟨⋈√NA: No acid added □ Other-specify: 5m1 conc. HNO_{q} added □ A: ANALYTICAL RESULTS from SAMPLES Units Date analyzed From NO. NA Sample: Date Conductivity (Corrected) Analyzed 121317 25°C (00095) Calcium ☐ Total non-filterable residue (suspended) Potassium (00530)Magnesium 55350 Sodium Other: 650 mg/l Bicarbonate A-H₂SO₄ 119000 Chloride ☐ Nitrate-N + . Nitrate-N mg/1total (00630) Ammonia-N total (00610) Total Solids ☐ Total Kieldahl-N /Z3 126 Mg/ Chemical oxygen demand (00340) mg/l Total organic carbon Cation/Anion Balance Cother: Analyst Date Reported Reviewed by Other: 151 Laboratory remarks

Phone or Letter?

Initals

ANALYTI	CATIONS E MEQ.	PPM	DET. LIMIT	ANALYTI	ANIONS E MEQ.	PPM	DET.
Ca Mg Na K	2407.57	17200.00 5870.00 55350.00 2860.00	<3.0 <0.3 <10.0 <0.3	HC03 SO4 CL	10.65 31.50 3847.67	650.00 1512.00 ########	
Mn Fe	0.00	0.00 0.00	 	NO3 C03 NH3 PO4	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	< 0. < 1. < 0. < 0.
SUMS	3821.13	81280.00			3889.83	########	!
Total Dissolved Solids= 100000 Ion Balance = 98.23%							

MAR - 1 1989
OIL CONSERVATION DIVISION SANTA FE



New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106

HEAVY METAL ANALYSIS FORM

Telephone: (505)841-2553

Date	1 100010	Lab nD	// User				
Received	1 / 1/9189	1 2 3 -1 /	/6 Code	(∏ 82:		☐ Other:	
COLLECTION	DATE & T	IME: yy m	m dd hh :	mm	COLLEC	TION SITE	DESCRIPTION
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	<u>Soye</u> j	/ forders	COM CX			- 	
mo.			, 1111/1-11-1	2./-	OLDITO -	· · · · · · · · · · · · · · · · · · ·	
TO:			WER TO	15.7	OWNER:		
		1	r I][[]			
ENVITOO	ם דגיייוניסועוו	TIDE'ST			CTMT T	OCATION:	
NIM OTT.	VINCEDIN VINCENTALL D	TON DIVIE	TON	ر الأقدام بين و"والي". معرف		: Cha	1106
State '	CONSERVA And Offi	UREAU [1] TION DIVIS Ce Bldg.,	DO BOX 30	rc RR	councy	·	000
		87504-2088	<i>i</i> .		Township	Range Section 7	racț: (10N06E24342)
DIE(III)	(f)	07304 2000	1/14	nklocale	2016	Range, Section, 1	214 + 71-1-1
ATTN:	N. Bou	100	(70 00000		190720	
	ONE: 827-	5812	STATI	ON/ WELL	CODE:	1 1 1 1 1	1 1 1 1 1 1
	,			,			
_		LATIT	UDE, LONG	ITUDE:	1 1 1	1 1 1 1 1	-
SAMPLING C	ONDITIONS		•	L			
☐ Bail	ed 🗌 P	ump Wat	er Level:	Discha	arge:		gle Type:
☐ Dipp		'ap					Deal 3
pH(00400)	Conducti	vity(Uncor	r.) Wate	r Temp. (0	0010)	Conductiv	vity at 25°C
$\overline{}$	> 0/2	1000 II	1	0		(00094)	
		µm µm	ho				umho
FIELD COMM		/_			\mathcal{A}		
Son	ngle S	many 12	sie ut	Laker	Me		<u> </u>
				·			
SAMPLE FIE				LAB ANA	LYSIS I	REQUESTED:	
Check pro			77-1	757.75	1D 0		
WPN:			Water		AP Scar		1 46 33
Preserved		Preserved	W/HNO3	1		ct to metal	L II AA
Non-Filte	reu	Filtered		TS LE	quired.		
		ΔΝΔΙΥ	TICAL RE	SULTS (MG/L		
ELEMENT	ICAP VAI		VALUE	ELEMEN		CAP VALUE	AA VALUE
Aluminum	<u> </u>		VILLEGE	Silico		.7	
Barium	< 1,			Silver		<0.1	П
Beryllium	< 1,			Stront	$\overline{3}$	40.	-
Boron	51.			Tin		4.5	
Cadmium	<1.0	<u> </u>		Vanadi	um —	<0.1	
Calcium	13900.			Zinc		₹0.1	
Chromium	<1.	<u>o</u> _		Arseni	c _	,	X <015
Cobalt	< 0.			Seleni	um		X <0.5
Copper	<1.0	<u> </u>		Mercur	У		€ <0.0005
Iron	9.7						<u></u>
Lead	< 1	1.0					
Magnesium	5210.						
Manganese	1.8						닠
Molybdenum							Ц
Nickel	-</td <td><u> </u></td> <td></td> <td></td> <td></td> <td></td> <td>□</td>	<u> </u>					□
							Outers
LAB COMMEN	TS:		······································				DIGGST
T 005							. // /
For OCD Us		1 -	1 7035		H1	Dani	al I Man
Date Owner			ICAP An	aryst 47	<u>77 </u>	Reviewer_/	your flesh
Pnone	or Letter		- Doto 3-	alyzed 2/	27/80	Data Dave	ived 2//3/29
	Initials	š .	Date An	alyzed 🦳	-1107	Date Revé	TAGG 1/(//()/



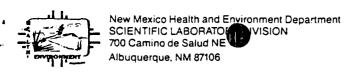
New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106

GENERAL WATER CHEMISTRY and NITROGEN ANALYSIS

DATE RECEIVED 8. 15 88 N	08 UK-3342 CODE □ 5	9300	OTHER: 8223	5
Collection TIME	SITE INFORM- ATION	mengency P	tato	rosling Sett Labor
Collected by — Person/Agency	Collection site desc	ription Sample Si	22215.	Side Cente, of
FINAL State Land	SERVATION DIVISION Office Bldg, PO Box 2 NM 87504-2088	2088	bont	
Phone: 827-58 SAMPLING CONDITIONS	12		Station/ well code	\$35 E-19.340
☐ Bailed ☐ Pump ☐ Dipped ☐ Tap	Water level	Discharge	Sá	ample type
pH (00400)	Conductivity (Uncorrected)	Water Temp. (00010)	35 °C C	onductivity at 25 °C (00094) µmho
Field comments				
SAMPLE FIELD TREATMEN	F — Check proper boxes			
No. of samples submitted / NF	. Whole sample F. Filtere	ed in field with A: 2	2 ml H₂SO₄/L a	added
✓ NA: No acid added □ C	Other-specify:	: 5ml conc. HNO ₃ a	dded □A:	4ml fuming HNO ₃ added
ANALYTICAL RESULTS from		hand = · · · ·		
Conductivity (Corrected) 25°C (00095)	Units Date and	From $\underline{/VP}$,	NA Sample:	Date <u>Analyzed</u>
□ Total non-filterable residue (suspended) (00530) □ ○ Other: □ Other: □ Other: □ Other: □	7.69 mg/l		110	1_mg/1_9/7
A-H₂SO₄		Chloride _	6025	mg/1 8/24
Nitrate-N + Nitrate-N total (00630) Ammonia-N total (00610) Total Kjeldahl-N () Chemical oxygen demand (00340) Total organic carbon () Other:	mg/lmg/lmg/lmg/lmg/lmg/l			ince
☐ Other:		Analysi		7 85 (E
Laboratory remarks				

ANALYT	CATIONS E MEQ.	PPM	DET. LIMIT	ANALYTE	ANIONS MEQ.	PPM	DET.
Ca Mg Na K	22.65 9.03 135.93 1.56	454.00 110.00 3125.00 61.00	<3.0 <0.3 <10.0 <0.3	HC03 S04 CL	1.48 9.06 169.96	90.50 435.00 6025.00	
Mn Fe	0.00	0.00	i	NO3 C03 NH3 PO4	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	< 0. < 1. < 0. < 0.
	169.18 Dissolved lance =	3750.00 Solids= 93.73%	10716	 Date o	180.50 C No.	6550.50 = 8803342	





HEAVY JETAL ANALYSIS FORM Telephone: (505)841-2553

Date Received	8 115 188	Lab	371	User Code	À 82	235	□ oth	ar.	
COLLECTION	DATE & T		mm 99					ITE DESCRI	IPTION
GOTT TOWNS	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	02	30811	1/6125	1	Capo	1715	elf-all	<u> </u>
COLLECTED E	34:	13	0497	100b		Emil	ngen	eypit.	
TO:			<i>L</i> , (<i>c</i>			OWNER:			<u> </u>
NM OIL State I	MENTAL B CONSERVA Land Offi FE, NM	TION DIV	, PO E	30x 2088	1	County Township,			
ATTN: _	Boy	1				<u> </u>	15 3218	12 0 1	_151
TELEPHO	NE: 827-	5812		STATION	I/ WELT	CODE:			
***		LA'	rirude.	LONGIT	UDE:	1 1 1	1 1	1 1 1-1	1 1 1
SAMPLING CO		:	-				, <u>I </u>		
☐ Baile		ump 7	Water I	Level:	Disch	arge:		Sample Typ	
	Conducti		corr.)	Water	Temp.(0	0010)	Condu	ctivity at	25°C
・フー		5,000			7.> °c	· 1	(0009		
FIELD COMME		5,000	umno		<u> </u>				umho
Samp	- / · · · · · · · · · · · · · · · · · ·	IN CO	nTene	0/ /201	who is	1011	n Ar	Ro	
CAMOVE ETER	(D) (III) (III)		, , , , , , , , , , , , , , , , , , , ,	() ()	/ 	* * * * * * * * * * * * * * * * * * *	7		
SAMPLE FIEL Check prop					LAB ANA	TASTS 1	ŒQUEST	ED:	
WPN: V	Vater	☐ WP	F: Wate			AP Scar			
Preserved Non-Filter	w/HNO ₃	Preser Filter		INO ₃				etal if A	A
NOU-LITCE	rea					quired.			
				L RES		(MG/L)			
ELEMENT Aluminum	ICAP VAI	<u> </u>	AA VALI	<u>1E</u>	ELEMEN Silico		AP VAL	UE AA	VALUE
Barium	0.3			_	Silver		<0	τ $_{\Box}$	
Beryllium	<0	<u>. </u>			Stront	ium $\overline{6}$.0		
Boron	1.5				Tin		<0		
Cadmium Calcium	490.	<u>, , , , , , , , , , , , , , , , , , , </u>			Vanadi Zinc	.um	<u>∠0,</u>		
Chromium	<0	,		-	Arseni	.c	701		0.05
Cobalt	∠0,				Seleni			·图 0.	007
Copper	0.3				Mercur	У	•		0.0005
Iron	0.1	-,- _,-						_	
Lead Magnesium	<u>~~ ~ 0</u>	<u> </u>		_		· -	 	ㅡ 片ㅡ	
Manganese	0.57				1 4 + 7 2	· ·		— 片—	
Molybdenum	2	51		_					
Nickel	<	0.1							
LAB COMMENTS: DIGGST									
For OCD Use:									
Date Owner			10	CAP Anal	lyst		Review	er	ishly
PHONE (or Letter Initials		Da	ate Ana	Lyzed		Date R	eveived/2	129/08
									r in the second



88-1333-C

SCIENTIFIC LABORATORY DIVISION 754

RGANIC ANALYSIS REQUEST F M

Organic Section - Phone: 841-2570

	•		
REPORT TO:	DAVID BOYER	S.L.D. No. (DR- <u>1333 A&B</u>
	N.M. OIL CONSERVATION DIVIS	SION DATE REC.	8-15-89
	P.O. Box 2088	PRIORITY	R
	Santa Fe, NM 87504-2088	PHONE(S):	827-5812
COLLEGEION C			Have
	erry: <u>Roswell</u>		
	ATE/TIME CODE: (Year-Month-Day-Hour-Minut	· / · · · · · · · · · · · · · · · · ·	1665
LOCATION COL	DE: (Township-Range-Section-Tracts) $ O S S$	·+2/1/15+5	(10N06E24342)
-	8 2 2 3 5 SUBMITTER: Day		CODE: 2 6 0
SAMPLE TYPE:	: WATER 📐, SOIL 🔲, FOOD 🔲, OTHER:_		
This form accom	npanies Septum Vials, Glass Jugs,	and/or	्राह्महर्गातिक विकास
	reserved as follows:	70175	前号超过少半天
☐ NP:	No Preservation; Sample stored at room tempe	rature.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
P-Ice	Sample stored in an ice bath (Not Frosen).	\\\\	NOV 11 1383 III VON
P-AA	Sample Preserved with Ascorbic Acid to remove	ve chlorine residual.	TION DIVISION
,	Sample Preserved with Hydrochloric Acid (2 of QUESTED: Please check the appropriate box(es)	helow to indicate the type con	ONSERVATION DIVISION
	ver possible list specific compounds suspected or		
	PURGEABLE SCREENS	EXTRACTABLE S	CREENS
	atic Headspace (1-5 Carbons)	(751) Aliphatic Hydr	
	atic & Halogenated Purgeables	(755) Base/Neutral E	
(765) Mass	Spectrometer Purgeables	(758) Herbicides, Chlo	•
= ' ` '	A VOC's I (8 Regulated +)	(760) Organochlorine	
	A VOC's II (EDB & DBCP)	(761) Organophosphat	
Othe	r Specific Compounds or Classes	(767) Polychlorinated	Biphenyls (PCB's)
		(764) Polynuclear Arc	
		(762) SDWA Pesticid	es & Herbicides
Remarks:			
(NOT	e white Laker Fax	1111 g- +(15)	
FIELD DATA:	15,000		•
$_{\rm pH=}$ \overline{Z} ; c	conductivity=umho/cm at 32 °C; Chi	lorine Residual= mg/l	
	n=mg/l; Alkalinity=mg/l; Flow R		
	ft.; Depth of wellft.; Perforation		in <i>a</i> ·
	on, Methods and Remarks (i.e. odors, etc.)		, ,
Conslor	1 SalTLahe Emera	Pit. Och	sheen & Bully
Sant	ne Fram 5. Sido Ja	enter of bank	
I certify that th	he results in this block accurately reflect the resure collector):	ults of my field analyses, obser	the Lab: Labe (a)
CHAIN OF CU	STODY		7
I certify that th	his sample was transferred from	to	
at (location)		on	and that
the statements i	in this block are correct. Evidentiary Seals: Not	Sealed OR Seals Intact:	Yes No
Signatures'			
For OCD	use: Date owner notified:	2/19/By Phone or	Cetter? Initials

LAB. No.: OR-

		THIS	PAGE	FOR	L
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ABORATORY RES ONLY

This sample was tested using the analytical screening method(s) checked below: PURGEABLE SCREENS EXTRACTABLE SCREENS (753) Aliphatic Headspace (1-5 Carbons) (751) Aliphatic Hydrocarbons (754) Aromatic & Halogenated Purgeables [(755) Base/Neutral Extractables (765) Mass Spectrometer Purgeables [(758) Herbicides, Chlorophenoxy acid (766) Trihalomethanes (759) Herbicides, Triazines 774) SDWA VOC's I (8 Regulated +) [(760) Organochlorine Pesticides [(775) SDWA VOC's II (EDB & DBCP) (761) Organophosphate Pesticides Other Specific Compounds or Classes (767) Polychlorinated Biphenyls (PCB's) (764) Polynuclear Aromatic Hydrocarbons (762) SDWA Pesticides & Herbicides ANALYTICAL RESULTS CONC. CONC. COMPOUND(S) DETECTED COMPOUND(S) DETECTED [PPB] [PPB] • DETECTION LIMIT • * + DETECTION LIMIT + ABBREVIATIONS USED: N D = NONE DETECTED AT OR ABOVE THE STATED DETECTION LIMIT T R = DETECTED AT A LEVEL BELOW THE STATED DETECTION LIMIT (NOT CONFIRMED) [RESULTS IN BRACKETS] ARE UNCONFIRMED AND/OR WITH APPROXIMATE QUANTITATION CERTIFICATE OF ANALYTICAL PERSONNEL I certify that I followed standard laboratory procedures on handling and analysis of this sample unless otherwise noted and that the statements on this page accurately reflect the analytical results for this sample. Mary C. Wan 19/88 . Analyst's signature: Date(s) of analysis:_ I certify that I have reviewed and concur with the analytical results for this sample and with the statements in this block. Reviewers signature:

LAB. No.: OR- 1337

_	_
4.0	
æ	10.0
40	10

THIS PAGE FOR LABORATORY RESULTS ONLY

This sample was tested using the analytical screening method(s) checked below:							
PURGEABLE SCREENS [753] Aliphatic Headspace (1-5 Carbons) [754] Aromatic & Halogenated Purgeables [765] Mass Spectrometer Purgeables [766] Trihalomethanes [774] SDWA VOC's I (8 Regulated +) [775] SDWA VOC's II (EDB & DBCP) Other Specific Compounds or Classes		EXTRACTABLE SCREENS (751) Aliphatic Hydrocarbons (755) Base/Neutral Extractables (758) Herbicides, Chlorophenoxy acid (759) Herbicides, Triazines (760) Organochlorine Pesticides (761) Organophosphate Pesticides (767) Polychlorinated Biphenyls (PCB's) (764) Polynuclear Aromatic Hydrocarbons (762) SDWA Pesticides & Herbicides					
<u>1A</u>	VALYTICAL	L RESULTS					
COMPOUND(S) DETECTED	CONC.	COMPOUND(S) DETECTED	CONC.				
cromatie pursoalles			12.21				
hemana	1200						
- Soldene	560						
ethe Lengene	1 11						
Charles persone	$\mathcal{T}_{\mathcal{D}}$						
1 - Sullene	$\frac{TR}{TQ}$						
0- Keyllene	7.72						
	40 ()						
palogenated purgiables	M. D.						
	-}						
• DETECTION LIMIT • * 101 TELL + DETECTION LIMIT + T							
ABBREVIATIONS USED: N D = NONE DETECTED AT OR ABOVE THE STATED DETECTION LIMIT T R = DETECTED AT A LEVEL BELOW THE STATED DETECTION LIMIT (NOT CONFIRMED) [RESULTS IN BRACKETS] ARE UNCONFIRMED AND/OR WITH APPROXIMATE QUANTITATION ABORATORY REMARKS:							
CERTIFIC	ATE OF ANALYT	ICAL PERSONNEL					
CERTIFICATE OF ANALYTICAL PERSONNEL Seal(s) Not Sealed Intact: Yes No Seal(s) broken by: Mot Sealed date:							
	e analytical results	for this sample and with the statements in this	block.				
Reviewers signature: N / 11 Lyshlm							



SCIENTIFIC LABORATORY DIVISION RGANIC ANALYSIS REQUEST F Organic Section - Phone: 841-2570

754 WM 88-1337-**c**

REPORT TO:	DAVID BOYER	S.L.D. No. OR- 1337 A+B
	N.M. OIL CONSERVATION DIVISION	
	P.O. Box 2088	PRIORITY 3
	Santa Fe, NM 87504-2088	PHONE(S): 827-5812
COLLECTION C		: COUNTY:
	ATE/TIME CODE: (Year-Month-Day-Hour-Minute)	
	E: (Township-Range-Section-Tracts)	- 1
	8 2 2 3 5 SUBMITTER: David Bo	
This form accom Samples were pr NP: P-Ice P-AA P-HCl ANALYSES REC required. Whenev (753) Alipha (754) Aroma (765) Mass (766) Trihal		ne residual. NOV 1 1 1989 NOV 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	VOC's I (8 Regulated +)	(760) Organochlorine Pesticides (761) Organophosphate Pesticides
	r Specific Compounds or Classes	(767) Polychlorinated Biphenyls (PCB's)
		(764) Polynuclear Aromatic Hydrocarbons (762) SDWA Pesticides & Herbicides
Remarks:		(102) OD WA TUBINGUE TO THE STATE OF
	to: Litelakes facility	
PIELD DATA:	> 50,000	•
pH=; Co	onductivity=umho/cm atC; Chlorine Rea	sidual=mg/l
	mg/l; Alkalinity=mg/l; Flow Rate	
Depth to water	ft.; Depth of wellft.; Perforation Interval	ft.; Casing:
	n, Methods and Remarks (i.e. odors, etc.) Solp Lake Comple Lipy Life Coppyodi	(120m Nin) Tank aD
colle	thomate Forperade	uo Dunto,
	e results in this block accurately reflect the results of m	
CHAIN OF CUS	STODY	/
I certify that th	is sample was transferred from	to
at (location)	on	
the statements i	n this block are correct. Evidentiary Seals: Not Sealed	OR Seals Intact: Yes No
Signatures'		
	,	

For OCD use: Date owner notified: 6/19/29 Phone or Letter? Initials



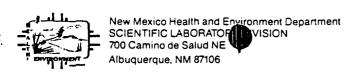
New Mexico Health and Environment Department SCIENTIFIC LABORATORY DIVISION 700 Camino de Salud NE Albuquerque, NM 87106 — 15) 841-2555

8592

GENERAL WATER CHEMISTRY nd NITROGEN ANALYSIS

DATE RECEIVED 8	15 88 N	5. WC-3346	USER 59300	59600 XX o	THER: 822	235		
Collection DATE Collection TIME		SITE INFORM. > Sample location Constant Saff Lake - Collection Site						
Collected by — Person/Ag	gency Y-7		Collection site description Samuel 8220 NW half une					
	Boy	4 /OCD						
5	NVIRONMENT	'AI RUPFAN			1000	1 You producted		
SEND	M OIL CONS	ERVATION DIV	/ISION		Was	le,		
FINAL S			PO Box 2088	3				
TO Santa Fe, NM 8/504-2088								
Phon	e: 827 - 58	12		The second secon	Station/ well code			
SAMPLING CO				· · · ·	Owner 08	15-295 19.340		
	□ Pump □ <tap< td=""><td>Water level</td><td></td><td>Discharge</td><td></td><td>Sample typer</td></tap<>	Water level		Discharge		Sample typer		
pH (00400)	7	Conductivity (Unco	rrected) µmho	Water Temp. (00010)	°C	Conductivity at 25°C (00094) µmho		
Field comments		100,0	γ) μιιιιο			μιπο		

SAMPLE FIELD	TREATMENT	T — Check prope						
No. of samples submitted	/ J⊠(NF	Whole sample (Non-filtered)	□ F: Filtered in	field with	ml H₂SO₄/	L added		
∠⊠.NA: No acid	dadded □ C			5ml conc. HNO3 ad	ded □A	A: 4ml fuming HNO ₃ added		
L		· · · · · · · · · · · · · · · · · · ·		3 3		33		
NA NA	ANALYTICAL RESULTS from SAMPLES NA Units Date analyzed From M., NA Sample: Date							
Conductivity (C 25°C (00095)	orrected)	192602,	umho <u>8/30</u>	- From <u>///</u> , r	MA Sample	Analyzed		
☐ Total non-filtera	ble			🔯 Calcium				
residue (susper (00530)	·		mg/l	Potassium _				
Other: Cal	- /-/ m	7.08	9/14	Magnesium _	25 <i>95</i>	#_mg/19/8		
☐ Other: ☐ Other:	<u></u>			Sodium	67900	mg/1 9/23		
				_ ∠ Bicarbonate	49	78 mg/1 9/14		
A-H₂SO₄				🗐 Chloride	150,50	0 mg/1 /0/17		
☐ Nitrate-N + , Nit total (00630)	rate-N		mg/l	Sulfate	88	5 mg/1 8/24		
☐ Ammonia-N tot			mg/l	- Total Solid	s <u>2798</u>	40 mg/1 9/9		
☐ Total Kjeldahl-N			mg/l	DXCOS		2 <u>9/14</u>		
☐ Chemical oxyged				A Radia	11.00	Lo.0141 8/25		
☐ Total organic ca			mg/l					
()			mg/l	- Cation/Af				
Other:				Analyst	1 1	eported Reviewed by		
Laboratory remarks	3			 	10 1	3 3 5 5		
1-10705			1392	Chille	/	/ / / / / /		
			- 17/4	findanced for	pou b	Mumbers totaling for his		



Telephone: (505)841-2553

Date Received 8 15 88 No. 16-370	User	(FT' 00005		, , , , , , , , , , , , , , , , , , , ,
Received 5 5 55 No. 16 - 3 OCCUPATION DATE & TIME: XX mm COLLECTION DATE & TIME: XX		<u>(ဩ⊆82235</u>	Other:	DESCRIPTION
	7/16/10		afford Scot 1	
COLLECTED BY:		2	Math Mich	Redenin lan
		i com	WE IN VINIO	carrier care
TO:	/	OWNE	R:	
ENVIRONMENTAL BUREAU		SITE	LOCATION:	
NM OIL CONSERVATION DIVISION		Coun	ty: CHarco	4
State Land Office Bldg., PO	Box 2088			
SANTA FE, NM 87504-2088		Township	Range, Section Tr	act: (10N06E24342)
ATTN: Roy		4	12/12/10/12/11	17.01710
TELEPHONE: 827-5812	STATION	/ WELL CODE:		
LATITUDI	I, LONGIT	UDE:		-
SAMPLING CONDITIONS:	-			
☐ Bailed ☐ Pump Water ☐ Dipped 反 Tap	Level:	Discharge:	6	le Type:
pH(00400) Conductivity(Uncorr.)	Water '	Temp. (00010)	Conductiv	ity at 25°C
7 > 56,000 µmho		°c	(00094)	umho
FIELD COMMENTS:				
Mandurok waley	······································			
SAMPLE FIELD TREATMENT		LAB ANALYSIS	RECUESTED.	
Check proper boxes:		LED MARLICIS	AMQUIDIED.	
WPN: Water WPF: Wat		ICAP Sc		
Preserved w/HNO Preserved w/Non-Filtered Filtered	HNO ₃	Mark box n is require	ext to metal	if AA
		JLTS (MG/I		
Aluminum ICAP VALUE AA VA	LUE	ELEMENT Silicon	ICAP VALUE ∠O. (AA VALUE
Aluminum <u><0.1</u> Barium <u><0.1</u>		Silver	<0,1	П
Beryllium <0.1		Strontium	290.	
Boron 60.		Tin	<0,	
Cadmium < o.		Vanadium	20.1	
Calcium /6000.		Zinc	<0.	\d
Chromium		Arsenic Selenium		X ≤0.05 X <0.05
Copper <0.1		Mercury		0,005
Iron 0.6		nor our y		十二二
Lead <0.				
Magnesium 4780				
Manganese 0.37				
Molybdenum <0.				
Nickel <0.				<u> </u>
LAB COMMENTS:				DIFEST
For OCD Use:			7	010
Date Owner Notified: Phone or Letter?	ICAP Anal	yst	Reviewer_	Johny
	Date Anal	yzed	Date Revei	ved 2/29/88



Crosby SaTT Lake (BRUKe Tank) 11/68



crosby Satt Lake (Broke Tank)



crosby Salt Labe-Broke Tank



Crosby Salt Lake (Broke Tank)



crosby Salt Lake (Broke Tank)



Crosby Salt Labe (Broke Tank)
11/88



cnosby Satt Lake (Broke Tank)
11/68



12/2/88 Crosby Salt Lake



Chosling Salt Lake (Broke hour)



Crosby Salt Lake (Broke Fank)
11/68



Crosby SalTLake (Broke Tank)



crosby Solt Labe (BRoKeTonk)



Crasby Salt Lake 12/2/88



Crosby salt Lake 12/2/88



12/2/88 Crosby Salt Lake



Crosby Salt Lake 12/2/88



12/2/6 " 1 10 by Sally in a



Crosly Salt Labe W Fazility 8/11/88 B\$-29E-19.340



Emengency Ports - Crosby SalTLake W. Foellit, 8/11/88

85-298-19,340



Emergency pond-Crasby SolTlake West Sweility 8/11/88

85-296-19.340



crosby Salt Labe-West Facility
8/11/88

85-298-19.340



Broken Pipe & Spillærea W. Focility-Crosby SolTlake 8/11/88

85-298-19,340



Crosby Salt Labo West Faility 8/11/88

95-295-19,390



crosly Solt Lake-West Facility, 8/11/88 85-598-19,344



crosby Salt Lake - le facility 8/11/88 85-29E-19,340



crosby SalT Laho - W. Socilety 8/11/88

85-296-19,340



Crosby Salt Lake West Sacility 8/11/88

85-29E-19, 340



Crosby Sult Lake - West Facility E/11/88

85-296-19,340



Pipeleabcrosby SalT Lake - West Sacility 8/11/88

85-295-19340



Crosby Salt Lake - West Sacility 8/11/88

85-296-19,340



Crosby Solt Lake - West Socility 8/11/88 85-29 E-19,346



Emergency Pond Crosby Satt Lake-Lest facility 8/11/88

85-295-19.340