

NM - 74

INSPECTIONS & DATA

Kieling, Martyne

From: Price, Wayne
Sent: Friday, June 19, 1998 2:59 PM
To: Martyne Kieling
Cc: Chris Williams
Subject: Penroc 5-17-33 pit June 19, 1998 2:06 PM

Dear Martyne:

Per your request I inspected the Penroc facility.
Please find enclosed three pictures of the Penroc site I scanned in for your review. I visited yesterday and site looks good.

Picture #1 Standing on West side of old pit area looking east.
Picture #2 Access area- very slight surficial hardpan.
Picture #3 Old location area.

NMOCD I recommends approval of closure.



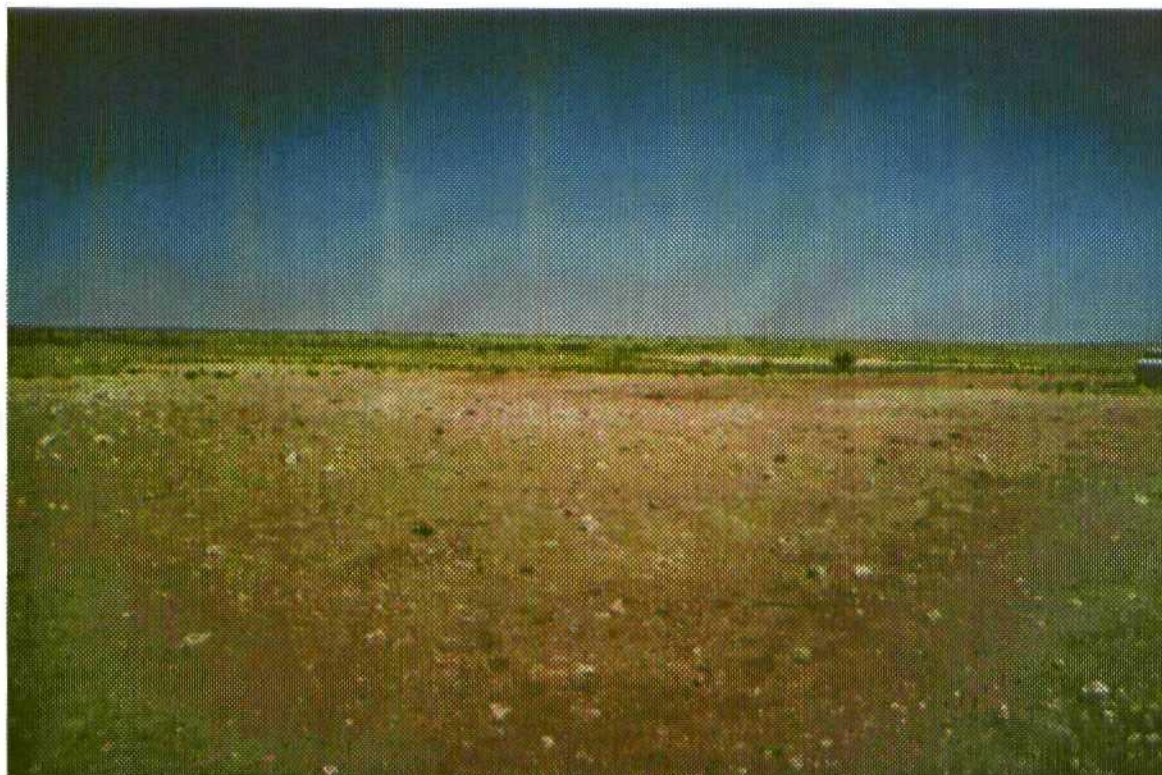
page1.JPG



page2.JPG



page3.JPG







DATE: 10/29/97

To MARTYNE KIELING
NMOC 1-700-827-8177

From

WAYNE PRICE - ENVIRONMENTAL ENGR. - NMOC DISTRICT I

Energy & Minerals Department

Telephone Number 505-393-6161 Fax # 505-393-0720

- | | |
|---|---|
| <input type="checkbox"/> For Your Files | <input type="checkbox"/> Prepare a Reply for My Signature |
| <input type="checkbox"/> For Your Review and Return | <input checked="" type="checkbox"/> For Your Information |
| <input type="checkbox"/> For Your Handling | <input type="checkbox"/> For Your Approval |
| <input type="checkbox"/> As Per Your Request | <input type="checkbox"/> For Your Signature |
| <input type="checkbox"/> Please Advise | <input checked="" type="checkbox"/> For Your Attention |

PENROC C-103TOTAL # of PAGES INCL. COVER 2

Submit 3 Copies
to Appropriate
District Office

NEW MEXICO
Energy, Minerals and Natural Resources Department

Form C-103
Revised 1-1-89

DISTRICT I
P.O. Box 1980, Hobbs, NM 88240

DISTRICT II
P.O. Drawer DD, Artesia, NM 88210

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

OIL CONSERVATION DIVISION 2040 Pacheco St. Santa Fe, NM 87505

WELL API NO.

5. Indicate Type of Lease

STATE ☒

FEE ☐

6. State Oil & Gas Lease No.

7. Lease Name or Unit Agreement Name

8. Well No.

9. Pool name or Wildcat

SUNDRY NOTICES AND REPORTS ON WELLS

(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well:

OIL WELL ☐

GAS WELL ☐

UNLINED PIT CLOSURE

OTHER ☐

2. Name of Operator

PENROC OIL CORPORATION

3. Address of Operator

P.O. Box 5970, Hobbs, NM 88241

4. Well Location

Unit Letter D

Feet From The

Line and

Feet From The

Line

Section 5

Township 17 S

Range 33 E

NMPM

Lea

County

10. Elevation (Show whether DF, RKB, RT, GR, etc.)

11.

Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☐

PLUG AND ABANDON ☐

TEMPORARILY ABANDON ☐

CHANGE PLANS ☐

PULL OR ALTER CASING ☐

OTHER: Closure plan for un-lined pit. ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☐

ALTERING CASING ☐

COMMENCE DRILLING OPNS. ☐

PLUG AND ABANDONMENT ☐

CASING TEST AND CEMENT JOB ☐

OTHER: ☐

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

As per NMOC D guidelines for un-lined production pit closure, Penroc Oil Corporation submits following plan:

1. Pick up rain water (accumulated from rain & has 200ppm chlorides) & dispose in SWD.
2. Dig and pick up slush & oily dirt and haul to Controlled Recovery.
3. Catch soil sample and analyse @ Cardinal Lab. per NMOC D guideline.
4. After satisfactory results of soil analysis backfill the pit area with clean native dirt.
5. Once approved by the NMOC D Pit Remediation & Closure Report will be filed.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE

M. Y. Merchant

TITLE

President

TYPE OR PRINT NAME

M. Y. Merchant

(This space for State Use)

APPROVED BY

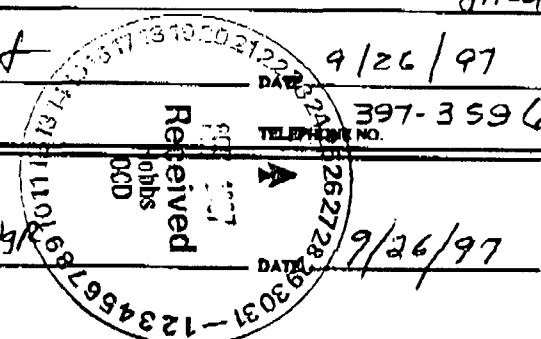
Walter Ruiz

TITLE

ENR ENGR

CONDITIONS OF APPROVAL, IF ANY:

AS PER NMOC D GUIDELINES!



PROBLEM OIL PIT INSPECTION CHECKLIST

Site Number (State-Year-Waypoint):

Penroc Pit

Checklists Completed (circle those that apply):

☒ A ☒ B ☐ C

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

6/12/97 ---Reproduced by US EPA Region VI with permission 9/19/97

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

PROBLEM OIL PIT INSPECTION CHECKLIST

SECTION ONE: Site Information

Site Name and Waypoint: Penroc Pit

Lease # and Operator: mohabba merch m.y.(merch) Merchant

Site Location Section/Township/Range: SEC. 5 T17S R. 33E

GPS Coordinates Obtained During Aerial Survey: _____

GPS Coordinates Obtained During Site Inspection: _____

Site Address: 5 mi East of Maljamar

City/County/State/Zip: _____

USFWS Case ID #: _____

EPA Facility ID # and/or NMOCD ID #'s: _____

Contact Name/Affiliation/Phone: mohabba merch 505-397-3596

Contact Address (if different from site address): _____

Site Type (production, commercial disposal, other): closed production

SECTION TWO: Inspection Information

Inspection date and time: 9/22/97

Describe weather conditions (including estimated temperature): clear warm

If known, list federal, state, or tribal programs that this site is subject to regulation under via a permit and list all permit number(s): _____

Inspection Team:

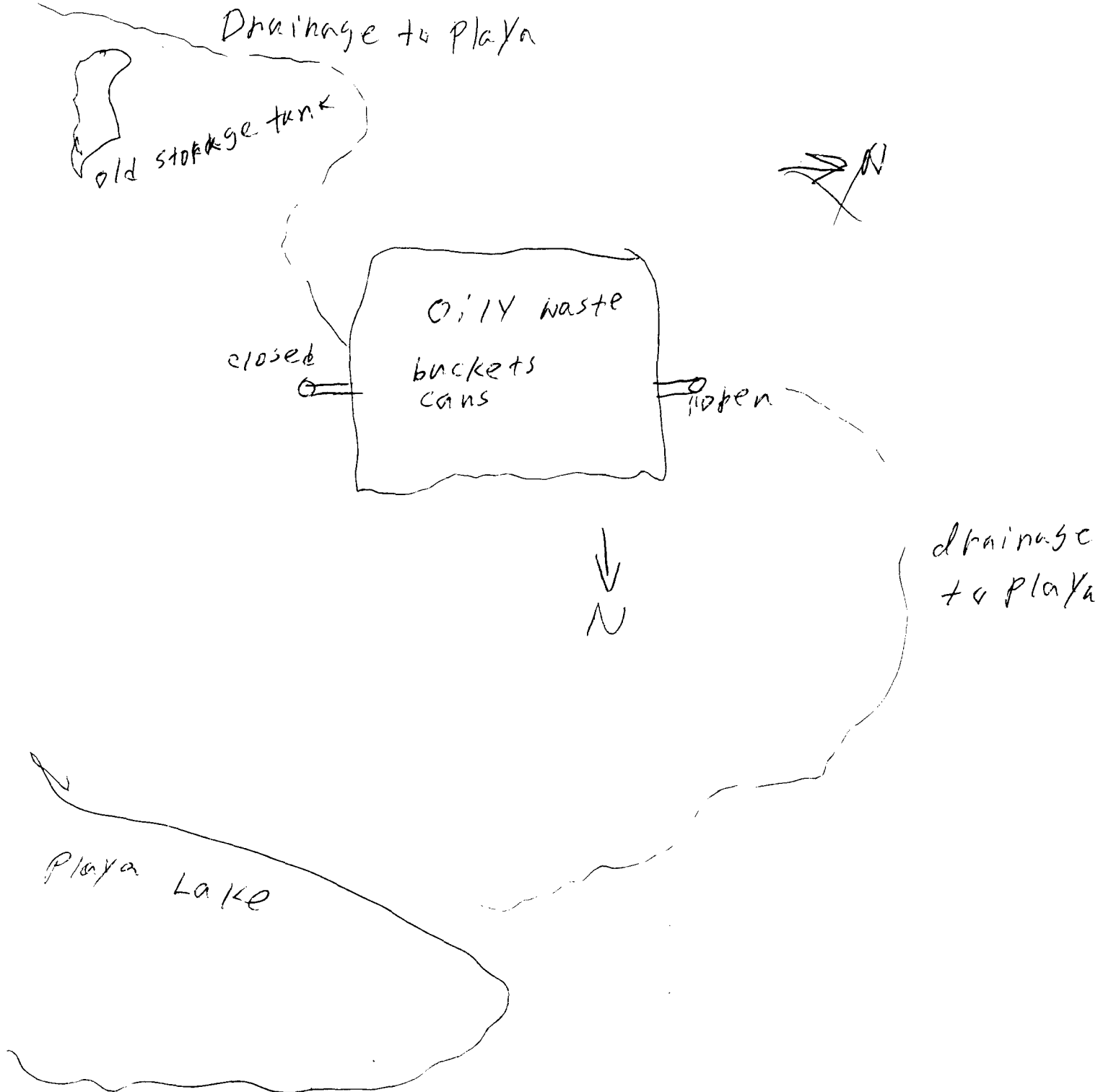
Inspector 1	<u>Wayne Price</u>	Agency/Program: <u>OCD</u>	Phone: _____
Inspector 2	<u>Nick Chavez</u>	Agency/Program: <u>FWS</u>	Phone: _____
Inspector 3	<u>Greg Pashia</u>	Agency/Program: <u>FPM</u>	Phone: _____
Inspector 4	_____	Agency/Program: _____	Phone: _____
Inspector 5	_____	Agency/Program: _____	Phone: _____
Inspector 6	_____	Agency/Program: _____	Phone: _____

SECTION THREE: Sketch of Site/Layout

Site Number and Name :

Penroc pit

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



SECTION FOUR: General Observations

A. *PITS (complete checklist A if any of the following conditions exist)*

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

Yes ☒ No ☐

Yes ☐ No ☒

Yes ☐ No ☒

B. *DISCHARGES (complete checklist B if any of the following conditions exist)*

1. Is there a discharge (either ongoing or one-time) from a pit, pond, tank, or other device at the site ?
2. Is there indication of any past or potential future discharge from a pit, pond, tank, or other device at the site (soil staining, fresh dirt or gravel used as cover, 2 ft or less freeboard maintained, eroded berms, etc.) ?

Yes ☒ No ☐

Yes ☒ No ☐

C. *TANKS AND CONTAINERS (complete checklist C if any of the following conditions exist)*

1. Are there any tanks or containers on site ?

Yes ☐ No ☒

CHECKLIST "A" - PITS

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

30' x 30' pit. Looked abandoned. Hard crust of oil waste but up to 4" liquid below crust. Strong odor.

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

No netting. Evidence, tire tracks that a vehicle had been to pit recently.

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

No birds. Most likely recently removed.

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

abandoned oil separation or oily waste pit. located on top of Ogallala aquifer formation. No freeboard oily waste at the top of berm. Stand pipe on north side had liquid coming out.

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

Site production closed about 1-2 years.

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

CHECKLIST "B" - DISCHARGES AND SPILLS

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

No NPDES.

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

Discharge from pit to natural drainage downhill was occurring. Recent rain running downhill to playa lake. Spill looked like continuous discharge. Pit over flow. Stand pipe at ground level on north side of pit.

3. Describe any indications (e.g. soil / vegetation staining on ground or in drainages) of past discharges or spills from pits, ponds, tanks, or other devices at the site. Include any indication of the type of material discharged or spilled (e.g. oil stain, salt brine, etc.) and when and for how long the discharge or spill occurred:

Stained soil around pit and leading downhill on both sides of pit to playa lake. Soil stained with oil. Denuded vegetation from salt water.

4. Identify and describe the drainage pathway (dry arroyo, ditch, stream, etc.) of any current or suspected past discharges or spills from the site. Trace the drainage pathway to a flowing waterway, if possible, and describe the extent of any oil staining. Include a description of whether the drainage is dry at the time of the inspection, contains standing water that doesn't appear to be flowing or, if flowing, the estimated flowrate (gal/min or cfs) of water and/or discharged material:

See diagram. Drainage to playa from top of hill to playa.

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

Pit had waste, which was oily to top of berm surrounding pit.

6. If possible, estimate the receipt rate or production rate (gal/day) of oil and/or produced water at the site:

N/A

7. If possible, determine whether or not any discharges or spills from the site have been reported and, if so, describe how (letter, phone, etc.), when, and to whom (EPA, BLM, DEQ, OGCC, BIA, etc.) it was reported:

No reports.

8. Describe the general housekeeping and maintenance of the facility and any conditions which could result in a discharge or spill (valves which could be opened, poorly supported pipelines, etc.):

Very poor. Abandoned.

CHECKLIST "C" - TANKS AND CONTAINERS

1. Identify whether or not the site has a Spill Prevention, Control, and Countermeasure (SPCC) Plan. If so, verify by personally viewing the plan, if possible. Has it been certified by a registered Professional Engineer?:
2. Describe the type, use, condition, maximum capacity (gal or bbl), contents, markings, and actual quantity at the time of the inspection for each tank and container on the site. Also describe any secondary containment for each tank and container, including its condition, estimated capacity, and method of precipitation removal:

Tank / Container Type and Use	Maximum Capacity	Actual Quantity	Secondary Containment	Markings	Comments (including condition)
----------------------------------	---------------------	-----------------	--------------------------	----------	-----------------------------------

NO TANKS

CONTINUATION SHEET (identify Section and/or Checklist continued)

PHOTO LOG

Pentoc Pit.

Site Number:

Film Type/ASA/Size: Kodak/200 ASA/135

Photographer: Wallace O'Rear

Photo Number _____ Subject Pentoc Pit near maljamar

R2E02 East Pit, looking west

R2E03 West Pit, looking east

R2E04 Pipe coming out of pit (south side of east pit)

R2E05 Pipe coming out of ~~south~~ north side of east pit



Penroc 2 pits

9/22/97

~~11~~ 16:00

NW/4, Sec 5, T17S, R33E

SSE



Pen Roc 2 unlined pits

9/22/97

1600

NW/4 Sec 5, T17S, R33E

East



Penroc 2 unlined pits

9/22/97

1600

NW 1/4, sec 5, T17S, R33E

ENE



Pen Roc 2 unlined pits

~~9/22~~ 9/22/97

1600

NW/4, Sec 5, T 17S, R 33E

EAST



Penroc 2 unlined Pits

9/22/97

1600

NW/4 Sec 5, T 17S, R 33E

South east



Pen rock 2 unlined pits

West of Lake with Ducks (Teal)

9/22/97

1600

NW/4, Sec 5, T17S, R33E

Looking East



Penroc 2 on lined pits west of
Lake with Ducks

9/22/97

1600

NW14, Sec 5, T17S, R13E

East



Pen roc 2 unlined pits

9/22/97

1600

NW/4, Sec 5, T 17S, R 33E

North west



Pen Roc 2 Unlined pits

9/22/97

1600

NW/4, Sec 5, T17S, R33E

North



NMOCD: ID#.129974 By: W Price #1
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking West-East side of
pit has been removed.



NMDCD: ID#.129974 By: W Price #2
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking NW-East side of
pit has been removed.



NMCCD: ID#.129974 By: W Price #3
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking west-west side of
pit, remaining. Heavy BS&W.



NMOCD: ID#.129974 By: W Price #4
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking NNE-Unknown bucket in pit sludge.



NMDCD: ID#.129974 By: W Price #5
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking NE-another Un-ID
Bucket in pit sludge.



NMOCD: ID#.129974 By: W Price #6
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Looking in East direction
West side of pit.



NMOCID: ID#.129974 By: W Price #7
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Standing inside of west pit
on NE side-cans, belts, pipe, wood.



NMOCB: ID#.129974 By: W Price #8
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Standing inside of west pit
on NE side-BS&W sludge & more cans.



NMOCB: ID#.129974 By: W Price #9
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Standing inside of west pit
on NE side-Same as #7 dug can out.



NMOCD: ID#.129974 By: W Price #10
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Standing inside of west pit
on NE side-Same as #9. n-nw.



NMOCID: ID#.129974 By: W Price #11
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: Standing on NW side looking
SE. Debris still on location on well pad



NMOCD: ID#.129974 By: W Price #12
Date/Time: Oct 30, 1997 1 pm
Site/Co. Penroc pit(Witness: B.Olson)
Location: NW/4 sec 5-Ts17s-R33e
Subject: East side pit area, now gone
looking S. hard calichie, stained soil