

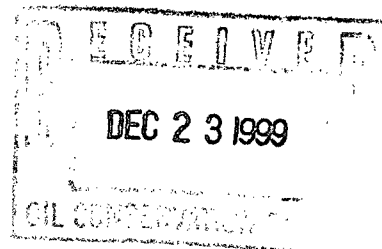
HBP - 5

GENERAL CORRESPONDENCE

YEAR(S):
1999 - 1989

BURLINGTON RESOURCES

SAN JUAN DIVISION



December 20, 1999

Mr. Roger Anderson
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

RE: Discharge of Hydrostatic Test Waters – Permit HBP-NM-005
Your letter dated November 29, 1999

Dear Mr. Anderson:

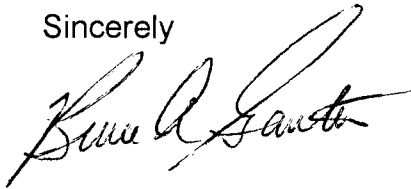
I am responding to your letter dated November 29, 1999, which addressed the permit referenced above. In your letter you indicated that the permit had expired and that Burlington Resources (BR) had failed to submit annual reports for each of the calendar years from 1995 – 1999.

I have checked our internal files as well as with our operations department concerning all past pipeline work and the disposition of hydrostatic test fluids. Attached you will find a list of all pipeline construction projects conducted by Burlington Resources (previously Meridian Oil). In each of these projects, BR used produced water from our production operations to perform these hydrostatic pipeline tests, and upon completion of the tests, the test fluids were all transported to a licensed saltwater disposal facility. I have attached a copy of a letter and Certificate of Waste Status from 1995 that illustrates this process for the Quinn Pipeline Loop and MB-20 Pipeline Loop projects.

In speaking with Martyne Kieling by telephone, she indicated that it would be acceptable to send you this letter with the above information without the need to submit annual reports showing zero discharge of hydrostatic test waters. In addition, it appears that we will not be needing the above referenced permit for future pipeline projects as we intend to continue the practice of using produced water from our production operations for any future hydrostatic testing and then disposing of these fluids in a licensed SWD facility.

If you have any questions or need further information concerning this matter, please do not hesitate to contact me at 505-326-9842.

Sincerely

A handwritten signature in cursive script, appearing to read "Bruce A. Gantner".

Bruce Gantner, PE
Manager, Environmental, Health & Safety

cc: Greg Kardos (Plant/Pipeline Supervisor)
Rick Benson (Facilities Engineer)

Burlington Resources
1994 - 1999 Pipeline Construction

	AFE		
	Date	Project Name	AFE #
1	Oct-94	Sandstone Pipelines	0B11
2	Oct-94	Frances Mesa Pipelines 30"	0B13
3	Oct-94	Frances Mesa Pipelines 24"	0B13
4	Jan-95	Pump Mesa-Phillips CPD	0J44
5	May-95	Sims Mesa Modifications	1C42
6	Sep-95	Lateral MD 7 Loop	1Q12
7	Oct-95	Lateral MD 10 Loop	1Q58
8	Oct-95	Lateral MB 13 Loop	1Q59
9	Dec-95	Cedar Hill Pipeline	2A45
10	Dec-95	Buena Vista Pipeline	2A47
11	Mar-96	Jackrabbit Interconnect	2I49
12	Jun-96	CO ² Pilot Pipeline	V919
13	Jan-97	Pump Cyn Gathering System	3C74
14	Jan-97	VV Gathering - Quinn Pipeline	2A46
15	Mar-97	Animas Inter-Connect	3N75
16	Mar-97	Aztec Inter-Connect	3N77
17	Mar-97	Primo Mudge Inter-Connect	3N76
18	May-97	Blanco #330 Loop	4D29
19	Jul-97	Quinn X-Over	4A62
20	Oct-97	Jackrabbit Transwestern Interconnect	4M22
21	Oct-97	29-6 WFS Interconnect	4P54

amm 12/7/99

May 1, 1995

Certified # P 895-114-165

Mr. David Catanach
Director, UIC Program
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: **Pipeline Hydrotest Fluid Disposal
McGrath #4 SWD
OCD Order R-7370**

Dear Mr. Catanach:

This is to advise you that Meridian Oil, Inc. (MOI) intends to periodically dispose of production pipeline hydrotest fluids at our McGrath #4 SWD. Generally, produced water is used for the test fluid and methanol is sometimes added for freeze protection. Volumes vary but are usually less than 100,000 gallons.

As discussed with you and Mr. Roger Anderson, OCD's Environmental Bureau is in agreement that these fluids are exempt under the federal RCRA program and thus, are appropriate for disposal at Class II injection well facilities.

Please give me a call at (505) 326-9841 if I can answer any further questions.

Sincerely yours,

Kevin C. Myers
Environmental Specialist

cc: Roger Anderson - OCD Santa Fe

CERTIFICATE OF WASTE STATUS

1. Generator Name and Address: BURLINGTON RESOURCES 3535 EAST 30th STREET FARMINGTON, NM 87402	2. Destination Name: Sunco Disposal
3. Originating Site (name): Quinn Pipeline Loop Project and the MB-20 Pipeline Loop Project Attach list of originating sites as appropriate.	Location of the Waste (Street address &/or ULSTR): Quinn #336 Well Site Unit Ltr. N, Section 17, Town 31N, Range 8W
4. Source and Description of Waste: Hydrotest water from the Quinn and MB-20 looping projects. Note: Freshwater was used in the process not produced water.	

I, Craig A. Bock representative for:

BURLINGTON RESOURCES do hereby certify that,
according to the Resource Conservation and Recovery Act (RCRA) and Environmental Protection
Agency's July, 1988, regulatory determination, the above described waste is: (check appropriate classification)

☐ **EXEMPT** oilfield waste

☒ **NON-EXEMPT** oilfield waste which is non-
hazardous by characteristic analysis or by product
identification

and that nothing has been added to the exempt or non-exempt non-hazardous waste defined above.

For **NON-EXEMPT** waste only the following documentation is attached (check appropriate items):

☐ MSDS Information
☒ RCRA Hazardous Waste Analysis
☒ Chain of Custody

Other (description):

Name (Original Signature): _____

Title: ENVIRONMENTAL REPRESENTATIVE

Date: November 4, 1997

Exempt Waste Manifest

Burlington Resources Oil & Gas

P.O. Box 4289, Farmington, NM 87499

Environmental
and Safety Dept.

1. Waste Location: Lease / Well No. / Facility Quinn #336 Well Site
Unit Ltr. N, Section 17, Town 31N, Range 8W

2. Volume: _____ Cubic Yards 400 Barrels _____ Gallons

3. Description of Waste:

All Liquid - (water)

4. Method of Waste Generation:

Hydrotest waste from the Quinn and the MB-20 loop projects

5. Disposal Facility: Sunco Disposal

6. Disposal Cost: _____

7. Certification: I do hereby certify that according tot he Resource Conservation and Recovery Act (40 CFR 261) that the above described waste is .

Exempt ☒ Non-Exempt / Non-Hazardous Hazardous

Approval for Disposal _____ Date 11/4/97

BR Representative **Transportation Company:** Sunco Trucking

Date(s) Transported: _____

BR Representative on Site: _____ **Date:** _____

Signature

Disposal Facility

Date (s) Received: _____

Notice: Complete and
return to Burlington

Environmental and
Safety Dept.

Total Volume Received: _____

Waste Location:
(Cell/Grid No)

Received By: _____

Signature



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 29, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-251

Mr. Bruce Gantner
Burlington Resources
P.O. Box 4289
Farmington, NM 87499-4289

RE: Discharge of Hydrostatic Test Waters Permit HBP-NM-005

Dear Mr. Gantner:

The Oil Conservation Division (OCD) has conducted a file review on the Hydrostatic Test Waters Permit HBP-NM-005 for Meridian Oil, Inc. (Meridian) now Burlington Resources. The five year Permit HBP-NM-005 **expired on October 31, 1999**. In addition, Permit condition 5 (five) required that a report must be filed every year (annually) summarizing the activities and that it shall contain the following information:

- A. Location of test – Section, Township, Range,
- B. Date of test,
- C. Volume of discharge and
- D. Source of test water.

Meridian/Burlington Resources failed to submit the annual report for 1995, 1996, 1997, 1998 and 1999. Burlington Resources shall submit hydrostatic discharge annual reports for 1995, 1996, 1997, 1998 and 1999 to the OCD by **January 2, 2000**.

If Burlington Resources wishes to perform hydrostatic tests of 100,000 gallons or less on new pipe they must submit a new application to the OCD.

If there are any questions, please call Martyne Kielling at (505-827-7153).

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: OCD Hobbs Office
OCD Artesia Office
OCD Aztec Office

MERIDIAN OIL

October 19, 1989

State of New Mexico
Oil Conservation Division
P.O. Box 2088
Land Office Building
Santa Fe, NM 87504-2088

ATTN: Mr. Roger C. Anderson
Environmental Engineer

Dear Mr. Anderson:

Meridian Oil Inc. is planning to hydrostatic test its Val Verde Gathering System gas and water pipelines as they are constructed, and requests a renewable five year permit.

The hydrostatic tests will use less than 100,000 gallons of water and will be constructed as a closed loop system test. The lines to be tested will cross lands owned by the U.S. and managed by the BLM, owned by the state of New Mexico and owned by private individuals. All landowners are aware of this work and have agreed in principal to this testing plan.

The gas and water pipelines consist of 2" to 8" O.D. steel pipe less than five miles in length.

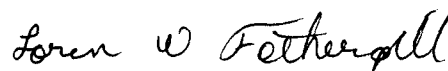
The water used for testing will be taken from company wells and transported by truck to portable storage tanks located at one end of the line to be tested. This water will be pumped from the tanks into the pipeline following a line scraper. When the first section is full (under 2,300 Bbls.) it will be pressure tested to 90% of specified minimum yield strength for eight hours.

The water may then be moved forward in the pipeline by placing a trailing scraper behind the water and using compressed air to propel the water. This procedure will be used to move the water to the opposite end of the pipeline. Each section will be pressure tested to 90% SMYS before the water is moved.

At the completion of the hydrostatic testing of all the pipeline sections the water will be moved into temporary storage tanks and then trucked to a company water disposal well. A typical water analysis is also attached for your information.

If you have any questions, please contact me or Gerry Brower at (505)326-9843.

Sincerely,



Loren W. Fothergill
Senior Staff Engineer

GTB/dj

xc: G.T. Brower
W.L. Arnold

Meridian Oil Inc., 3535 East 30th St., P.O. Box 4289, Farmington, New Mexico 87499-4289, Telephone 505-327-0251



INTERNATIONAL ASSOCIATION OF AGRICULTURAL CHEMISTS

API WATER ANALYSIS REPORT FORM

3/10/89

Company		MERIDIAN OIL COMPANY		Sample No.	Date Sampled
Field	Legal Description			County or Parish	State
Lease or Unit	Well	Depth	Formation	Water, B/D	
30-1-24-434					
Type of Water (Produced, Supply, etc.)		Sampling Point			
1					

DISSOLVED SOLIDS

CATIONS

Sodium, Na (calc)
Calcium, Ca
Magnesium, Mg
Barium, Ba

mg/l	me/l
641.2	280.0
72	3.6
27	2.4

OTHER PROPERTIES

pH 7.46
Specific Gravity, 60/60 F. 72° F.
Resistivity (ohm-meters) 257

ANIONS

Chloride, Cl
Sulfate, SO₄
Carbonate, CO₃
Bicarbonate, HCO₃

781	222.0
0	0
0	0
1410.1	368.0

Total Dissolved Solids (calc.) 3400

Iron, Fe (total)
Sulfide, as H₂S

mg

REMARKS & RECOMMENDATIONS:

