

BW - 4

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006 → 1989

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Wednesday, July 26, 2006 8:21 AM
To: 'gandy2@leaco.net'
Cc: seay04@leaco.net
Subject: Brine well Permit ~~BW-04~~ Wasserhund has expired
Contacts: Larry Gandy
Attachments: DP_BEF.rtf

Dear Larry and Eddie:

Please complete the attached form and submit with a \$100 filing fee made out to the Water Quality Management fund. In addition, please make arrangements to pressure test your brine well and cavern using during the week of August 14, 2006. The test pressure shall be 300 psig held for 4 hours. A pressure gauge and recently calibrated pressure recording chart shall be provided on the casing. The pressure recorder shall be calibrated for a maximum range of 500 psig and a 500 psig chart shall be used. The clock on the recorder shall be set at 8 or 12 hours.

Please submit the brine well renewal application within 10 days and notify this office 3 working days in advance of the test so OCD may witness.

7/26/2006

Price, Wayne

From: Price, Wayne
Sent: Monday, September 13, 2004 1:54 PM
To: Larry Gandy (E-mail); Mike Griffin (E-mail)
Cc: Sheeley, Paul
Subject: Gandy Brine Station BW-04

Dear Mr. Gandy:

The OCD is in receipt of the Eidson Station Remediation Project work plan submitted by Whole Earth Environmental and the E-mails dated August 24 and September 06, 2004. OCD has reviewed the plan and hereby approves with the following conditions:

1. The New Tank facility and loading areas planned shall be constructed with secondary containment approved by OCD. Please submit plans and drawings by November 15, 2004.
2. There shall be one additional monitor well installed in close proximity to the existing brine well pond to be located on the SE corner of the pond. The well shall be constructed with a minimum of 20 foot of screen with a 5 feet above the water table. The well shall be constructed, developed and purged per OCD standards previously approved. This well shall be installed and sampled before November 15, 2004. During construction, the well shall be logged, split spoon samples shall be collected every 10 feet. Soil samples shall be analyzed for Chlorides.
3. Gandy shall continue it commitment of cleaning up all visual salt contaminated soils and reporting leaks and spills. Also Gandy shall abide by all discharge plan requirements.
4. A brine pond closure plan shall be submitted by November 15, 2004 for OCD approval.
5. Please submit all of the information above by November 15, 2004. Include the water analysis results for the following. The water supply wells, the two monitor wells, and the down-gradient Texaco well. The analysis shall be total general chemistry. Please provide isopleths maps of any contamination, water level information and groundwater flow gradient maps.
6. Once OCD has received all of the above information then OCD will continue the evaluation of the model.

Please be advised that NMOCD approval of this plan does not relieve (Gandy Corp.) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Gandy Corp) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Price, Wayne

From: Larry D. Gandy [gandy2@leaco.net]
Sent: Monday, September 06, 2004 12:48 PM
To: Price, Wayne
Cc: dgandy@pvtnetworks.com
Subject: Eidson Brine Station

Dear Mr. Price:

RE; Inspection

As per the facility inspection dated 8-19-04, Gandy Corp. removed all surface and visual brine contaminated soil to the GMI facility on 8-25-04.

Gandy Corp. is looking forward to approval of the submitted work plan to continue the clean up of this facility and the approved tank storage area to prevent these situations.

Sincerely,

Larry Gandy
505-398-4960

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

Price, Wayne

From: Mike Griffin [whearth@msn.com]
Sent: Tuesday, August 24, 2004 3:39 PM
To: Wayne Price
Cc: Larry Gandy
Subject: Eidson Station

Good Afternoon, Wayne:

I want to first of all thank you for your informal guidance and candid assessment of our remediation protocol for the Eidson spill. You are correct in stating that the site has a long and complex history making the development of a plume model extremely problematic.

After our telecon, I spoke to both Larry and Dale Gandy about the plume modeling dilemma. Like you, they are anxious to move forward on the area adjacent to the bar ditch and agree to your suggestion that they excavate the soils within the primary impact area to a minimum depth of 3' and then cover the excavation with compacted soils. (In our protocol it is described as the area around bore hole A-4).

They have additionally agreed to begin the closure of the pit. As you know, the entire surface of the pit is presently covered in several feet of mineral salt. It is our intent to liquify these solids and send them to commercial disposal. Larry is working on the equipment and techniques necessary to achieve the intended result. Rather than delay action on the spill site, I would like to propose that we submit a separate closure protocol for the pit. We should be able to have it to you within 45 days.

I was a bit startled when I received your report & photos this afternoon. When we were at the site some months ago no such staining was present. Immediately after I received your report I spoke to Larry & was advised that what you saw was yet another NEW spill that just occurred within the past few days. Larry is writing up a formal report to send to your Hobbs office and is working right now to remove all surface stains.

Mike Griffin
Whole Earth Environmental, Inc.
Phone: 281.394.2050
FAX: 281.394.2051

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

8/24/2004

Price, Wayne

From: Price, Wayne
Sent: Tuesday, August 24, 2004 2:11 PM
To: Larry Gandy (E-mail)
Cc: Mike Griffin (E-mail); Williams, Chris; Sheeley, Paul; Johnson, Larry
Subject: Eidson Brine station BW004 Violation of Permit Conditions

Dear Mr. Gandy:

OCD is in the process of evaluating the work plan submitted by Whole Earth Environmental. OCD anticipates to have that review completed in 1-2 weeks. In the mean time OCD is hereby ordering you to continue the clean-up of all visual contaminated soil at this site. Please find enclosed a copy of my site visit on Aug 19, 2004. Please provide a progress report in 10 days.



Copy of INsp report
8_19_04Doc...



DCP02206.JPG



DCP02207.JPG

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

Environmental Facility Inspection

Facility Name	WASSERHUND EIDSON BRINE	Time Out	16:45	Time In	17:00	Hrs	
Inspector	Wayne Price	DI Mod	8/24/2004	Purpose	Status Check		
Inspection Date	08/19/2004	Inspect No.	eLWMP0423749546	Type	Field Inspection		

Violations / Documentation

List Violations or Indicate Compliance

Specific Violation
Contamination observed on ground surface

Additional Violation Notes

Operator shall remove all of the visual contaminated soils within 10 days.

Documentation Acquired: Samples Statements Sketch Video Photos

Compliance Items (Checked Items Denote Non-Compliance)

Write Compliance Based on this Inspection

- Drums Process AG Tanks AG Saddle Tk Labeling Tanks/Sumps Permits
 UG Lines WD Practice Class V Housekeepin Spill Rpt Potential ENV Wtr Wells

Describe Remedial Action Required

1. Brine water has been spilled on the ground. This is a permit violation.

Use [SHIFT] + [F2] to Expand any Notes or Comment Field





Price, Wayne

From: Price, Wayne
Sent: Monday, August 02, 2004 11:24 AM
To: Larry Gandy (E-mail)
Cc: Sheeley, Paul; Williams, Chris
Subject: Wasserhund Brine station BW-04

Dear Mr. Gandy:

Please find enclosed photos taken by the OCD District office. It appears that the temporary tanks being used has no secondary containment and brine water is being released to the ground surface. Please note all leaks and spills shall be reported pursuant to you the current Discharge Plan. Reporting and perform remedial actions is required pursuant to the Discharge Plan BW-04. OCD does understand that Gandy Corp. is in the process of modifying your permit to eliminate the brine storage pond and go to tank systems. Please note these new tank systems shall be installed on an impermeable device with berms. WE are in the process of reviewing your discharge plan modification and investigation/remediation plan. In the mean time, OCD will allow temporary storage as long as the brine water is not allowed to be released to the surface. Please remove the visual salt contaminated salt from the surface near the temporary tanks within 10 days and dispose at an approved OCD site.



Wasserhaund pix
7-20-04.rtf

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us



07/20/2004







NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

February 20, 2004

CERTIFIED MAIL

RETURN RECEIPT NO. 7923 4382

Larry Gandy, Vice President
Gandy Corporation
P.O. Box 827
Tatum, New Mexico, 88267

Subject: Compliance with Permit Operating Conditions

Dear Mr. Gandy:

The groundwater discharge plan for the Eidson Brine Station Well BW-004 operated by Gandy Corporation located in SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico was approved under the conditions contained in the permit. The OCD district office has noted that it appears that some of these conditions are not being adhered to and as a result groundwater may have been impacted. Please find enclosed photos taken at the site and a water analysis from a nearby fresh water well. The water in this well exceeds the New Mexico groundwater standards for chlorides.

Please submit for OCD approval, a plan to stop all releases of salt water, repair the leaks in the brine pond liner system, and a vadose and groundwater zone investigation plan by March 31, 2004.

If you have any questions please do not hesitate to contact me at 505-476-3487 or e-mail WPRICE@state.nm.us.

Sincerely;

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office

Attachments-2



Water well located SE of Brine Station.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

FAX

TO: Wyal

FROM: Paul Sheeley
Energy Minerals and Natural Resources Department,
Oil Conservation Division

RE: Well Sample - Texaco (Near Wassenbunnd)

DATE: 9-12-03

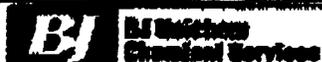
Note:

		WQCC mg/L
[Cl ⁻]	= 424	250
[Fe ⁺²]	= 266	1.0
[Mn ⁺²]	= 5.8	0.2

Paul S.

3 Pages (Including Transmittal)

Analytical Laboratory Report for:
ChevronTexaco



UNICHEM Representative: John Offutt

Production Water Analysis

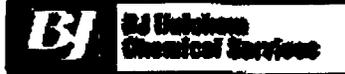
Listed below please find water analysis report from: CVU, #4 WSW

Lab Test No: 2003136460 Sample Date: 08/22/2003
 Specific Gravity: 1.002
 TDS: 1223
 pH: 8.65

Cations:	mg/L	as:
Calcium	129	(Ca ⁺⁺)
Magnesium	10.48	(Mg ⁺⁺)
Sodium	113	(Na ⁺)
Iron	265.67	(Fe ⁺⁺)
Barium	0.08	(Ba ⁺⁺)
Strontium	1.28	(Sr ⁺⁺)
Manganese	5.84	(Mn ⁺⁺)
Anions:	mg/L	as:
Bicarbonate	220	(HCO ₃ ⁻)
Sulfate	54	(SO ₄ ⁻²)
Chloride	424	(Cl ⁻)
Gases:		
Carbon Dioxide		(CO ₂)
Hydrogen Sulfide		(H ₂ S)

ChevronTexaco

Lab Test No: 2003135450



**DownHole SAT™ Scale Prediction
@ 100 deg. F**

Mineral Scale	Saturation Index	Momentary Excess (lbs/1000 bbls)
Calcite (CaCO ₃)	.356	-.0908
Aragonite (CaCO ₃)	.302	-.116
Witherite (BaCO ₃)	< 0.001	-6.71
Strontianite (SrCO ₃)	.00888	-2.12
Magnesite (MgCO ₃)	.0263	-1.39
Anhydrite (CaSO ₄)	.0183	-303.65
Gypsum (CaSO ₄ *2H ₂ O)	.0225	-502.59
Baite (BaSO ₄)	.243	-.147
Celestite (SrSO ₄)	.00378	-66.62
Silica (SiO ₂)	0	-57.01
Brucite (Mg(OH) ₂)	< 0.001	-1.92
Magnesium silicate	0	-84.63
Siderite (FeCO ₃)	1524	.0582
Halite (NaCl)	< 0.001	-153184
Therardite (Na ₂ SO ₄)	< 0.001	-37206
Iron sulfide (FeS)	0	> 0.001

Interpretation of DHSat Results:

The Saturation Index is calculated for each mineral species independently and is a measure of the degree of supersaturation (driving force for precipitation) under the conditions modeled. This value ranges from 0 to Infinity with 1.0 representing a condition of equilibrium where scale will neither dissolve nor precipitate. Values less than 1.0 are undersaturated and values greater than 1.0 are supersaturated. The scale is logarithmic, i.e. a Saturation Index of 3 is 10 times more saturated than a value of 2.

The Momentary excess is a measure of how much scale would have to precipitate to bring the system back to a non-scaling condition. This value ranges from negative (dissolving) Infinity to positive (precipitating) Infinity. The Momentary Excess represents the amount of scale possible while the Saturation Level represents the probability that scale will form.

Price, Wayne

From: Sheeley, Paul
Sent: Wednesday, July 16, 2003 2:53 PM
To: Price, Wayne
Subject: RE: Wasserhund- Eidson Brine St. (Gandy)

Thanks Wayne. The photos don't do it justice.

-----Original Message-----

From: Price, Wayne
Sent: Wednesday, July 16, 2003 1:12 PM
To: Ford, Jack
Cc: Sheeley, Paul
Subject: RE: Wasserhund- Eidson Brine St. (Gandy)

Paul thanks for the info. This is a permitted brine station BW-04. I am really surprised to see this. This has been a good operation. I am now checking into why we are having these problems. I have given Gandy Corp 10 days to respond.

-----Original Message-----

From: Ford, Jack
Sent: Wednesday, July 16, 2003 10:16 AM
To: Price, Wayne
Subject: FW: Wasserhund- Eidson Brine St. (Gandy)

here are the pictures from Paul

-----Original Message-----

From: Sheeley, Paul
Sent: Wednesday, July 16, 2003 8:38 AM
To: Ford, Jack; Anderson, Roger
Cc: Williams, Chris; Johnson, Larry
Subject: Wasserhund- Eidson Brine St. (Gandy)

<< File: Picture_2271.JPG >> << File: Picture_2272.JPG >> << File: Picture_2273.JPG >> << File: Picture_2274.JPG >> << File: Picture_2275.JPG >> << File: Picture_2276.JPG >> << File: Picture_2277.JPG >>
Jack,

This brine station just north of Buckey needs remediated. They have Major spills regularly (>200bbbs) and do not report. I believe that the liner in the pond is leaking. I believe there is 3-4 feet of consistent solid salt on the bottom of the pond. The pond has recently failed. The overflow prevention is insufficient. The sump needs to be leak checked. **The drivers need alarm clocks.** I called Larry Gandy to give him the opportunity to do the right thing. They just covered it up. I will bet that the total mass of Chloride released at this location is in the top ten in Lea county. And, maybe number one Chloride polluter at present. Those little white spots in the pix are salt granules...like you purchase for sidewalks and homemade ice cream. I also picked up a 20-30lb chunk of salt on the ground. Ground water is likely 50-100Ft.

I suggest that Gandy needs a discharge plan or needs to follow the one they may have. I want to shut them down immediately and force them to drill 3 monitor wells, remediate and rebuild the pond and the loading dock/sump.

Thanks,
Paul S

*PICTURES IN RBAMS!
MAYBE?*

Price, Wayne

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Picture_2271.JPG



Picture_2272.JPG



Picture_2273.JPG



Picture_2274.JPG



Picture_2275.JPG



Picture_2276.JPG



Picture_2277.JPG

Jack,

This brine station just north of Buckey needs remediated. They have Major spills regularly (>200bbls) and do not report. I believe that the liner in the pond is leaking. I believe there is 3-4 feet of consistent solid salt on the bottom of the pond. The pond has recently failed. The overflow prevention is insufficient. The sump needs to be leak checked. **The drivers need alarm clocks.** I called Larry Gandy to give him the opportunity to do the right thing. They just covered it up. I will bet that the total mass of Chloride released at this location is in the top ten in Lea county. And, maybe number one Chloride polluter at present. Those little white spots in the pix are salt granules...like you purchase for sidewalks and homemade ice cream. I also picked up a 20-30lb chunk of salt on the ground. Ground water is likely 50-100Ft.

I suggest that Gandy needs a discharge plan or needs to follow the one they may have.

I want to shut them down immediately and force them to drill 3 monitor wells, remediate and rebuild the pond and the loading dock/sump.

Thanks,
Paul S

30-025-26883-00-00

Submit 3 Copies To Appropriate District Office
District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources

Form C-103
Revised March 25, 1999

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

WELL API NO.
5. Indicate Type of Lease STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name: Eidson Brine Station BW-004
8. Well No. 1
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 Other Brine Well

2. Name of Operator
Wasserhund, Inc.

3. Address of Operator
P.O. Box 827, Tatum, NM 88267

4. Well Location
Unit Letter M : 567.4 feet from the South line and 161.7 feet from the West line
Section 31 Township 16 Range 35 NMPM Lea County

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

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

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input checked="" type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPLETION <input type="checkbox"/>	CASING TEST AND CEMENT JOB <input type="checkbox"/>	
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

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. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.

Pulled tubing, ran in hole with scraper, cleaned casing. ran in hole with packer at 1845, pressured upon casing to 420 pounds for 30 minutes, casing test witnessed by Larry Johnson. Ran 1793 feet of DSS 2 7/8 tubing and ran 683 feet of j-55 tubing, put back at 2476 feet and put back into production on August 31, 2001.

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

SIGNATURE [Signature] TITLE Bookkeeper DATE 9/07/01
Type or print name Donny Collins Telephone No. (505) 398-49 60
(This space for State use)

APPROVED BY _____ TITLE _____ DATE _____
Conditions of approval, if any:



THE REPRODUCTION OF

THE

FOLLOWING

DOCUMENT (S)

CANNOT BE IMPROVED

DUE TO

THE CONDITION OF

THE ORIGINAL

Submit 3 Copies To Appropriate District Office
 District I
 1625 N. Elmore Dr., Hobbs, NM 88240
 District II
 811 South East, Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 Revised March 25, 1999

OIL CONSERVATION DIVISION
 2040 South Pacheco
 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:
 Eidson Brine Station
 BW 0004

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 REWORK OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT TO DRILL" (FORM 101) FOR SUCH PROPOSALS.)

1. Type of Well:
 Oil Well Gas Well Other Brine Well

2. Name of Operator
 Wasserhand, Inc.

3. Address of Operator
 P.O. Box 827, Tatum, NM 88267

4. Well Location
 Unit letter _____ M _____ 567.4 feet from the South _____ line and 161.7 feet from the West _____ line
 Section 31 Township 16 Range 35 NMPM Lea County

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

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

NOTICE OF INTENTION TO:

REMEDIAL WORK PLUG AND ABANDON

TEMPORARILY ABANDON CHANGE PLANS

RECOMPLETION MULTIPLE COMPLETION

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. For Multiple Completions: Attach wellbore diagram of proposed completion or recapitulation.

Pulled tubing, ran in hole with scraper, cleaned casing. ran in hole with packer at 1845, pressured upon casing to 420 pounds for 30 minutes, casing test witnessed by Larry Johnson. Ran 1793 feet of 5SS 2 7/8 tubing and ran 683 feet of 3-55 tubing, put back at 2476 feet and put back into production on August 31, 2001.

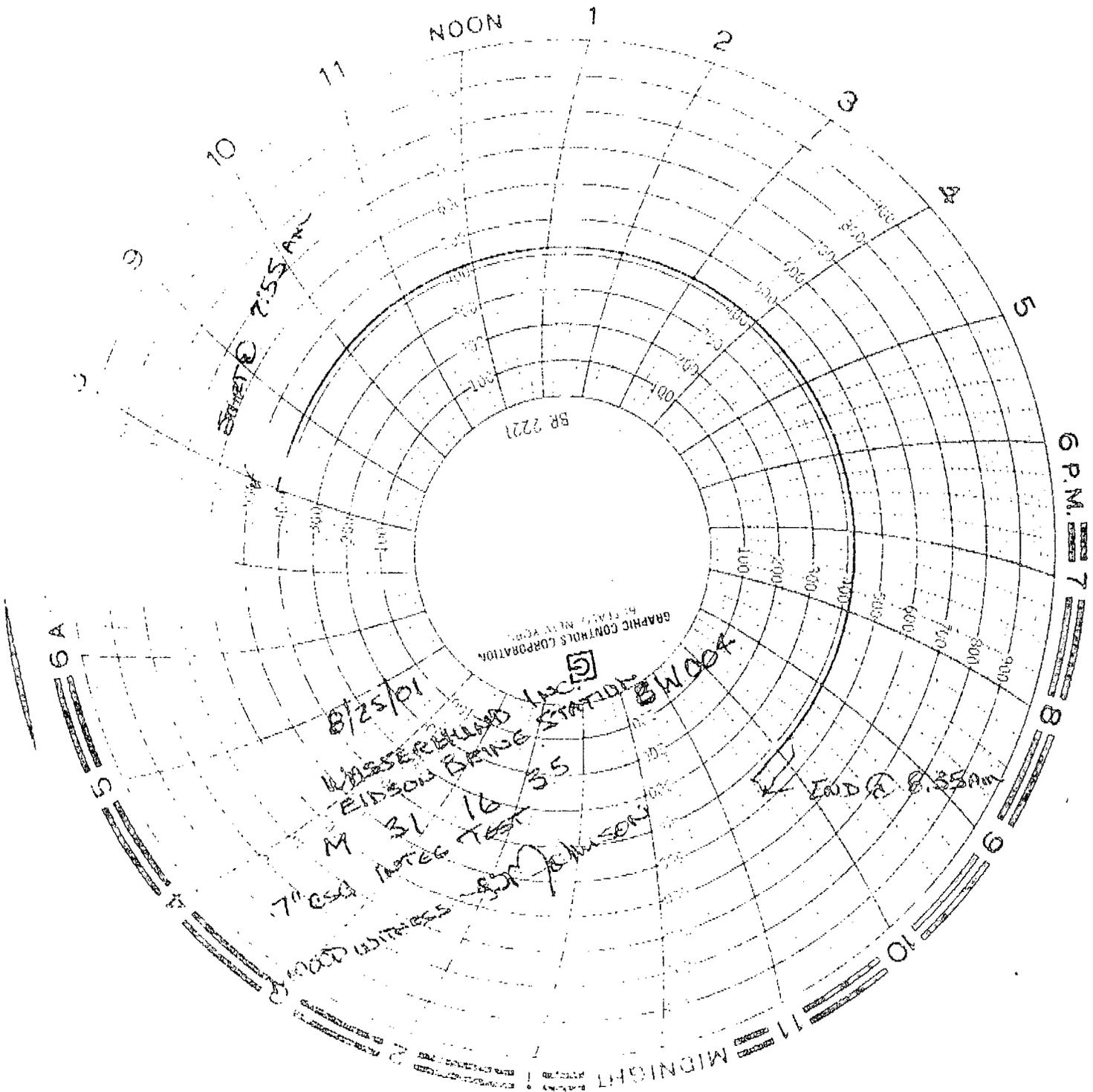
I hereby certify that the information herein is true and complete to the best of my knowledge and belief.

SIGNATURE _____ TITLE Bookkeeper DATE 9/07/01

Type or print name _____ Telephone No. (505) 398-4960

(This space for State use)

APPROVED BY _____ TITLE _____ DATE _____
 Conditions of approval, if any:



Submit 3 Copies To Appropriate District Office
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 1625 N. French Dr., Hobbs, NM 88240
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 1000 Rio Brazos Rd., Aztec, NM 87410
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State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 Revised March 25, 1999

OIL CONSERVATION DIVISION
 2040 South Pacheco
 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:
 Midson Brine Station
 BW-004

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 Other Brine Well

2. Name of Operator
 Wassermann, Inc.

3. Address of Operator
 P.O. Box 827, Tatum, NM 88267

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 Unit Letter M 567.4 feet from the South line and 161.7 feet from the West line
 Section 31 Township 16 Range 35 NMPM Lea County

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

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

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
REMEDIAL WORK <input checked="" type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
ADDITION <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
RE CASING <input type="checkbox"/>	MULTIPLE COMPLETION <input type="checkbox"/>	CASING TEST AND CEMENT JOB <input type="checkbox"/>	
		OTHER: <input type="checkbox"/>	

Proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Hole in Tubing
 Will Pull and Replace Tubing

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

SIGNATURE [Signature] TITLE Bookkeeper DATE 8/14/01

Type or print name DANNY CO Telephone No. (505) 398-4960
 (This space for State use)

APPROVED BY _____ TITLE _____ DATE _____
 Conditions of approval, if any.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/20/01
or cash received on _____ in the amount of \$ 1700⁰⁰
from GANDY CORPORATION
for EIDSON BRINE ST. BW-004

Submitted by: (Facility Name) WAYNE PRICE . Date: (CP No.) 8/20/01

Submitted to ASD by: [Signature] Date: 8/20/01

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal
Modification _____ Other _____

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____



GANDY CORPORATION
P. O. BOX 827 PH. 398-4960
TATUM, NM 88267



DATE 8-10-01 95-219-1070

\$1,700.00

DOLLARS \$ *1700.00

PAY
TO THE ORDER
OF

Water Quality Management Fund
C/O Oil Conservation Division
1220 South Saint Frances Drive
Santa Fe, NM 87505

Payment of Discharge Plan
Eidson Brine Station BW 004

VOID AFTER 90 DAYS

Alta Gandy NP



WELLS FARGO BANK NEW MEXICO, N.A.
LOVINGTON, NM 88260

Submit 3 Copies To Appropriate District Office
 District I
 1625 N. French Dr., Hobbs, NM 88240
 District II
 811 South First, Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 Revised March 25, 1999

OIL CONSERVATION DIVISION
 2040 South Pacheco
 Santa Fe, NM 87505

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 <input type="checkbox"/> Gas Well <input type="checkbox"/> Other Brine Well <input checked="" type="checkbox"/>		WELL API NO. 5. Indicate Type of Lease STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/> 6. State Oil & Gas Lease No. 7. Lease Name or Unit Agreement Name: Eidson Brine Station BW-004
2. Name of Operator Wasserhund, Inc.	8. Well No. 1	
3. Address of Operator P.O. Box 827, Tatum, NM 88267	9. Pool name or Wildcat	
4. Well Location Unit Letter <u>M</u> : <u>567.4</u> feet from the <u>South</u> line and <u>161.7</u> feet from the <u>West</u> line Section <u>31</u> Township <u>16</u> Range <u>35</u> NMPM Lea County		
10. Elevation (Show whether DR, RKB, RT, GR, etc.)		

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

NOTICE OF INTENTION TO: PERFORM REMEDIAL WORK <input checked="" type="checkbox"/> PLUG AND ABANDON <input type="checkbox"/> TEMPORARILY ABANDON <input type="checkbox"/> CHANGE PLANS <input type="checkbox"/> PULL OR ALTER CASING <input type="checkbox"/> MULTIPLE COMPLETION <input type="checkbox"/> OTHER: <input type="checkbox"/>		SUBSEQUENT REPORT OF: REMEDIAL WORK <input type="checkbox"/> ALTERING CASING <input type="checkbox"/> COMMENCE DRILLING OPNS. <input type="checkbox"/> PLUG AND ABANDONMENT <input type="checkbox"/> CASING TEST AND CEMENT JOB <input type="checkbox"/> OTHER: <input type="checkbox"/>	
--	--	---	--

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. For Multiple Completions: Attach wellbore diagram of proposed completion or recompilation.

Hole in Tubing
 Will Pull and Replace Tubing

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

SIGNATURE [Signature] TITLE Bookkeeper DATE 8/14/01

Type or print name Donny Collins Telephone No. (505) 398-4960
 (This space for State use)

APPROVED BY _____ TITLE _____ DATE _____

Conditions of approval, if any:

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
ATTN: WAYNE PRICE
1220 S. ST. FRANCIS DRIVE
SANTA FE, NM 87505

AD NUMBER: 211290 ACCOUNT: 56689
LEGAL NO: 69498 P.O.#: 01199000033
299 LINES 1 time(s) at \$ 131.80
AFFIDAVITS: 5.25
TAX: 8.57
TOTAL: 145.62

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO

COUNTY OF SANTA FE

I, MM Weideman being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #69498 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/13/2001 and 06/13/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13 day of June, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

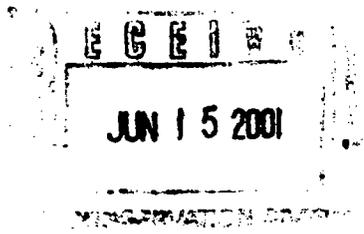
/s/ MM Weideman
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
13 day of June A.D., 2001

Notary Laura E. Harding

Commission Expires 11/23/03

*Approved Wayne Price
7/06/01*



NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCE DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505; Telephone (505) 476-3440:

(BW-004) - Gandy Corporation, Larry Gandy, Vice-President, P.O. Box 827, Tatum, New Mexico, 88267 has submitted an application for renewal of its previously approved discharge plan for its brine well facility. The brine extraction facility is located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,000 feet and brine is extracted with an average total dissolved solids concentration of 313,000 mg/l. Groundwater most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of approximately 325 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-006) - I&W Incorporated, George Parchman, P.O. Box 98, Loco Hills, New Mexico 88255, has submitted a discharge plan renewal application for their Carlsbad Eugenie Brine Extraction Facility located in the SW/4 SW/4 of Section 17, Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico. Fresh water is injected down annulus of the No. 1 well to an approximate depth of 550 feet and brine is produced through the tubing. The brine has an average total dissolved solids content of 300,000 mg/l. Groundwater most likely to be affected by any accidental discharge is at a depth of 50 feet with a total dissolved solids concentration of about 1,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(BW-028) - Gold Star SWD Ltd. Co., Royce Crowell, Manager/Partner, P.O. Box 1480, Eunice, New Mexico, 88231 has submitted an application for their proposed Eunice Brine Station, located in the NW/4 NW/4 of Section 15, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Fresh water will be injected to an approximate depth of 2,000 feet. Approximately 1,000 barrels per day of brine water will be extracted with an average total dissolved solids concentration of 300,000 mg/l. The brine water will be stored in three 500 barrel aboveground closed top fiberglass tanks. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 80 feet and has a total dissolved solids content of approximately 1,200 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

LEGALS

reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
Legal #69498
Pub. June 13, 2001

AMPROVED OK
W. W. W.
7/6/01

FFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1 weeks.

Beginning with the issue dated

June 17 2001

and ending with the issue dated

June 17 2001

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 18th day of

June 2001

Jodi Benson

Notary Public.

My Commission expires
October 18, 2004
(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL NOTICE
June 17, 2001

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7 Th. day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
SEAL
#18236

*Approved
W. Benson
7/6/01*

01100060000 67500753

State of New Mexico Oil &
1220 S. St. Francis
Santa Fe, NM 87505

GANDY CORPORATION

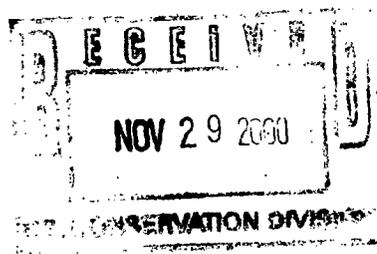
OILFIELD SERVICES

P.O. BOX 827

TATUM, NEW MEXICO 88267

(505) 398-4960

FAX -505-398-6887



November 27, 2000

Mr. Wayne Price
New Mexico Oil & Gas Division
2040 S. Pacheco
Santa Fe, NM 88205

Dear Wayne:

When I sent in the original C-104 I left off quite a bit of information. Donna called me today and I have corrected all that was left off.

I have sent a corrected copy to Donna in the Hobbs office and am forwarding this copy to you.

I am sorry for this mistake.

Sincerely,

A handwritten signature in cursive script that reads "Rue Mauk".

Rue Mauk

District I
 1625 N. French Dr., Hobbs, NM 88240
 District II
 811 South First, Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals & Natural Resources
CONSERVATION DIVISION
 2040 South Pacheco
 Santa Fe, NM 87505

Form C-104
 Revised June 1, 2000

Submit to Appropriate District Office
 5 Copies

AMENDED REPORT

I. REQUEST FOR ALLOWABLE AND AUTHORIZATION TO TRANSPORT

1 Operator name and Address Gandy Corporation P. O. Box 827 Tatum, NM 88267		2 OGRID Number 8426
4 API Number 30-0 25-26888		3 Reason for Filing Code/ Effective Date CH 10-01-2000
5 Pool Name BSW; SALADO		6 Pool Code 96713
7 Property Code	8 Property Name EIDSON STATE	9 Well Number 1

II. 10 Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South Line	Feet from the	East/West line	County
M	31	16-S	35-E		567	South	161	West	Lea

11 Bottom Hole Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

12 Lse Code	13 Producing Method Code	14 Gas Connection Date	15 C-129 Permit Number	16 C-129 Effective Date	17 C-129 Expiration Date

III. Oil and Gas Transporters

18 Transporter OGRID	19 Transporter Name and Address	20 POD	21 O/G	22 POD ULSTR Location and Description

V. Produced Water

23 POD	24 POD ULSTR Location and Description

Well Completion Data

25 Spud Date	26 Ready Date	27 TD	28 PBDT	29 Perforations	30 DHC, MC
31 Hole Size	32 Casing & Tubing Size	33 Depth Set	34 Sacks Cement		

I. Well Test Data

35 Date New Oil	36 Gas Delivery Date	37 Test Date	38 Test Length	39 Tbg. Pressure	40 Csg. Pressure
41 Choke Size	42 Oil	43 Water	44 Gas	45 AOF	46 Test Method

I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information given above is true and complete to the best of my knowledge and belief.

Signature: Larry Gandy
 Printed name: Larry Gandy
 Title: Vice-President
 Date: 11-14-00 Phone: 505-398-4960

OIL CONSERVATION DIVISION

Approved by: _____
 Title: _____
 Approval Date: _____

If this is a change of operator fill in the OGRID number and name of the previous operator.

Previous Operator Signature: _____ Printed Name: J E Haseloff Title: President Date: 11-14-00

New Mexico Oil Conservation Division
C-104 Instructions

IF THIS IS AN AMENDED REPORT, CHECK THE BOX LABELED "AMENDED REPORT" AT THE TOP OF THIS DOCUMENT

Report all gas volumes at 15.025 PSIA at 60°.
Report all oil volumes to the nearest whole barrel.

A request for allowable for a newly drilled or deepened well must be accompanied by a tabulation of the deviation tests conducted in accordance with Rule 111.

All sections of this form must be filled out for allowable requests on new and recompleted wells.

Fill out only sections I, II, III, IV, and the operator certifications for changes of operator, property name, well number, transporter, or other such changes.

A separate C-104 must be filed for each pool in a multiple completion.

Improperly filled out or incomplete forms may be returned to operators unapproved.

1. Operator's name and address
2. Operator's OGRID number. If you do not have one, it will be assigned and filled in by the District office.
3. Reason for filing code from the following table:

NW	New Well
RC	Recompletion
CH	Change of Operator
AO	Add oil/condensate transporter
CO	Change oil/condensate transporter
AG	Add gas transporter
CG	Change gas transporter
RT	Request for test allowable (Include volume requested)

If for any other reason write that reason in this box.
4. The API number of this well.
5. The name of the pool for this completion.
6. The pool code for this pool.
7. The property code for this completion.
8. The property name (well name) for this completion.
9. The well number for this completion.
10. The surface location of this completion. NOTE: If the United States government survey designates a Lot Number for this location use that number in the 'UL or lot no.' box. Otherwise use the OCD unit letter.
11. The bottom hole location of this completion.
12. Lease code from the following table:

F	Federal
S	State
P	Fee
J	Jicarilla
N	Navajo
U	Ute Mountain Ute
I	Other Indian Tribe
13. The producing method code from the following table:

F	Flowing
P	Pumping or other artificial lift
14. MM/DD/YY that this completion was first connected to a gas transporter.
15. The permit number from the District approved C-129 for this completion.
16. MM/DD/YY of the C-129 approval for this completion.
17. MM/DD/YY of the expiration of C-129 approval for this completion.
18. The gas or oil transporter's OGRID number.
19. Name and address of the transporter of the product.
20. The number assigned to the POD from which this product will be transported by this transporter. If this is a new well or recompletion and this POD has no number, the district office will assign a number and write it here.
21. Product code from the following table:

O	Oil
G	Gas
22. The ULSTR location of this POD if it is different from the well completion location and a short description of the POD (Example: "Battery A", "Jones CPD", etc.)
23. The POD number of the storage from which water is moved from this property. If this is a new well or recompletion and this POD has no number, the district office will assign a number and write it here.
24. The ULSTR location of this POD if it is different from the well completion location and a short description of the POD (Example: "Battery A Water Tank", "Jones CPD Water Tank", etc.).
25. MO/DA/YR drilling commenced.
26. MO/DA/YR this completion was ready to produce.
27. Total vertical depth of the well.
28. Plugback vertical depth.
29. Top and bottom perforation in this completion or casing shoe and TD if openhole.
30. Write in 'DHC' if this completion is downhole commingled with another completion or 'MC' if there is more than one non-commingled completion in this well bore. Attach actual completed well bore diagram
31. Outside diameter of the casing and tubing.
32. Depth of casing and tubing. If a casing liner, show top and bottom.
33. Number of sacks of cement used per casing string.
34. MM/DD/YY that new oil was first produced.
35. MM/DD/YY that gas was first produced into a pipeline.
36. MM/DD/YY that the following test was completed.
37. Length in hours of the test.
38. Flowing tubing pressure - oil wells
Shut-in tubing pressure - gas wells
39. Flowing casing pressure - oil wells
Shut-in casing pressure - gas wells
40. Diameter of the choke used in the test.
41. Barrels of oil produced during the test.
42. Barrels of water produced during the test.
43. MCF of gas produced during the test.
44. Gas well calculated absolute open flow in MCF/D.
45. The method used to test the well:

F	Flowing
P	Pumping
S	Swabbing

If other method please write it in.
46. The signature, printed name, and title of the person authorized to make this report, the date this report was signed, and the telephone number to call for questions about this report.
47. The previous operator's name, the signature, printed name, and title of the previous operator's representative authorized to verify that the previous operator no longer operates this completion, and the date this report was signed by that person.

GANDY CORPORATION

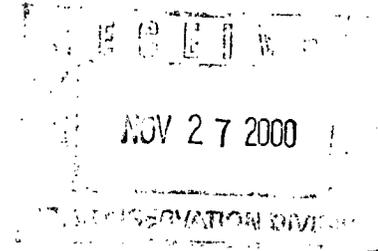
OILFIELD SERVICES

P.O. BOX 827

TATUM, NEW MEXICO 88267

(505) 398-4960

FAX -505-398-6887



November 21, 2000

Mr. Wayne Price
New Mexico Oil & Gas Division
2040 S. Pacheco
Santa Fe, NM 88205

Dear Wayne:

We are enclosing a copy of the C-104 that we sent to Donna in the Hobbs office showing a change of ownership on the brine station.

Gandy Corporation has taken over the ownership and assumed the discharge plan for the station.

Sincerely,

Larry Gandy

NOTICE OF PUBLICATION

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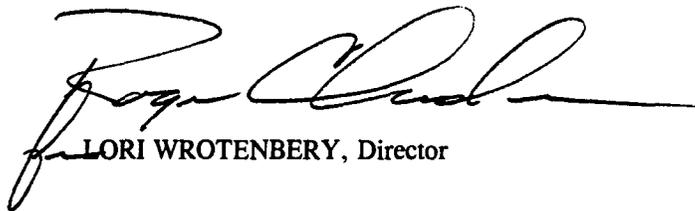
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7 Th. day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL

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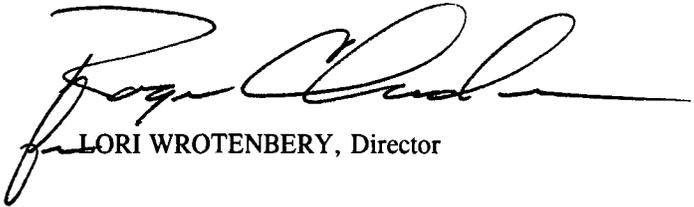
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7 Th. day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

S E A L

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/26/01
or cash received on _____ in the amount of \$ 100⁰⁰

from GANDY CORP
for WASSERHUND BRINE ST. BW-004

Submitted by: WAYNE PRICE (Family Name) Date: 3/2/01 (DP No.)

Submitted to ASD by: [Signature] Date: 3/2/01

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____ (opportunity)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



GANDY CORPORATION
P. O. BOX 827 PH. 398-4960
TATUM, NM 88267



DATE 2-26-01

95-219-107C

PAY TO THE ORDER OF

DOLLARS \$ *100.00

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

Renewal Permit for Wassershund Brine Station

VOID AFTER 90 DAYS

Alta Gandy MP



WELLS FARGO BANK NEW MEXICO, N.A.
LOVINGTON, NM 88260

District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION
2040 South Pacheco
Santa Fe, NM 87505

Submit to Appropriate District Office
5 Copies

District IV
2040 South Pacheco, Santa Fe, NM 87505

AMENDED REPORT

I. REQUEST FOR ALLOWABLE AND AUTHORIZATION TO TRANSPORT

¹ Operator name and Address Gandy Corporation P. O. Box 827 Tatum, NM 88267		² OGRID Number 8426
		³ Reason for Filing Code/ Effective Date CH 10-01-2000
⁴ API Number 30 - 0	⁵ Pool Name	⁶ Pool Code
⁷ Property Code	⁸ Property Name	⁹ Well Number

II. ¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South Line	Feet from the	East/West line	County
	31	16-8	35-E		567	South	161	West	Lea

¹¹ Bottom Hole Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Lse Code	¹³ Producing Method Code	¹⁴ Gas Connection Date	¹⁵ C-129 Permit Number	¹⁶ C-129 Effective Date	¹⁷ C-129 Expiration Date				

III. Oil and Gas Transporters

¹⁸ Transporter OGRID	¹⁹ Transporter Name and Address	²⁰ POD	²¹ O/G	²² POD ULSTR Location and Description

IV. Produced Water

²³ POD	²⁴ POD ULSTR Location and Description
-------------------	--

V. Well Completion Data

²⁵ Spud Date	²⁶ Ready Date	²⁷ TD	²⁸ PBTD	²⁹ Perforations	³⁰ DHC, MC
³¹ Hole Size	³² Casing & Tubing Size	³³ Depth Set	³⁴ Sacks Cement		

VI. Well Test Data

³⁵ Date New Oil	³⁶ Gas Delivery Date	³⁷ Test Date	³⁸ Test Length	³⁹ Tbg. Pressure	⁴⁰ Csg. Pressure
⁴¹ Choke Size	⁴² Oil	⁴³ Water	⁴⁴ Gas	⁴⁵ AOF	⁴⁶ Test Method

I hereby certify that the rules of the Oil Conservation Division have been complied with and that the information given above is true and complete to the best of my knowledge and belief.

Signature: *Larry Gandy*
Printed name: Larry Gandy
Title: Vice-President
Date: 11-14-00 Phone: 505-398-4960

OIL CONSERVATION DIVISION

Approved by:
Title:
Approval Date:

* If this is a change of operator fill in the OGRID number and name of the previous operator

Previous Operator Signature

130851

Printed Name

J E Haseloff

Title

President

Date

11-14-00

New Mexico Oil Conservation Division
C-104 Instructions

IF THIS IS AN AMENDED REPORT, CHECK THE BOX LABELED "AMENDED REPORT" AT THE TOP OF THIS DOCUMENT

Report all gas volumes at 15.025 PSIA at 60°.
Report all oil volumes to the nearest whole barrel.

A request for allowable for a newly drilled or deepened well must be accompanied by a tabulation of the deviation tests conducted in accordance with Rule 111.

All sections of this form must be filled out for allowable requests on new and recompleted wells.

Fill out only sections I, II, III, IV, and the operator certifications for changes of operator, property name, well number, transporter, or other such changes.

A separate C-104 must be filed for each pool in a multiple completion.

Improperly filled out or incomplete forms may be returned to operators unapproved.

1. Operator's name and address
2. Operator's OGRID number. If you do not have one, it will be assigned and filled in by the District office.
3. Reason for filing code from the following table:

NW	New Well
RC	Recompletion
CH	Change of Operator
AO	Add oil/condensate transporter
CO	Change oil/condensate transporter
AG	Add gas transporter
CG	Change gas transporter
RT	Request for test allowable (Include volume requested)

If for any other reason write that reason in this box.
4. The API number of this well.
5. The name of the pool for this completion.
6. The pool code for this pool.
7. The property code for this completion.
8. The property name (well name) for this completion.
9. The well number for this completion.
10. The surface location of this completion. **NOTE: If the United States government survey designates a Lot Number for this location use that number in the "UL or lot no." box. Otherwise use the OCD unit letter.**
11. The bottom hole location of this completion.
12. Lease code from the following table:

F	Federal
S	State
P	Fee
J	Jicarilla
N	Navajo
U	Ute Mountain Ute
I	Other Indian Tribe
13. The producing method code from the following table:

F	Flowing
P	Pumping or other artificial lift
14. MM/DD/YY that this completion was first connected to a gas transporter.
15. The permit number from the District approved C-129 for this completion.
16. MM/DD/YY of the C-129 approval for this completion.
17. MM/DD/YY of the expiration of C-129 approval for this completion.
18. The gas or oil transporter's OGRID number.
19. Name and address of the transporter of the product.
20. The number assigned to the POD from which this product will be transported by this transporter. If this is a new well or recompletion and this POD has no number, the district office will assign a number and write it here.
21. Product code from the following table:

O	Oil
G	Gas
22. The ULSTR location of this POD if it is different from the well completion location and a short description of the POD (Example: "Battery A", "Jones CPD", etc.)
23. The POD number of the storage from which water is moved from this property. If this is a new well or recompletion and this POD has no number, the district office will assign a number and write it here.
24. The ULSTR location of this POD if it is different from the well completion location and a short description of the POD (Example: "Battery A Water Tank", "Jones CPD Water Tank", etc.).
25. MO/DA/YR drilling commenced.
26. MO/DA/YR this completion was ready to produce.
27. Total vertical depth of the well.
28. Plugback vertical depth.
29. Top and bottom perforation in this completion or casing shoe and TD if openhole.
30. Write in 'DHC' if this completion is downhold commingled with another completion or 'MC' if there is more than one non-commingled completion in this well bore. Attach actual completed well bore diagram
31. Outside diameter of the casing and tubing.
32. Depth of casing and tubing. If a casing liner, show top and bottom.
33. Number of sacks of cement used per casing string.
The following test data is for an oil well. It must be from a test conducted only after the total volume of load oil is recovered.
34. MM/DD/YY that new oil was first produced.
35. MM/DD/YY that gas was first produced into a pipeline.
36. MM/DD/YY that the following test was completed.
37. Length in hours of the test.
38. Flowing tubing pressure - oil wells
Shut-in tubing pressure - gas wells
39. Flowing casing pressure - oil wells
Shut-in casing pressure - gas wells
40. Diameter of the choke used in the test.
41. Barrels of oil produced during the test.
42. Barrels of water produced during the test.
43. MCF of gas produced during the test.
44. Gas well calculated absolute open flow in MCF/D.
45. The method used to test the well:

F	Flowing
P	Pumping
S	Swabbing

If other method please write it in.
46. The signature, printed name, and title of the person authorized to make this report, the date this report was signed, and the telephone number to call for questions about this report.
47. The previous operator's name, the signature, printed name, and title of the previous operator's representative authorized to verify that the previous operator no longer operates this completion, and the date this report was signed by that person.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS

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

New Renewal Modification

1. Type: BRINE STATION Wasser hund.

2. Operator: GANDY CORPORATION

Address: P.O. BOX 827, TATUM, NM 88267

Contact Person: LARRY GANDY Phone: (505) 398-4960

3. Location: SW /4 SW /4 Section 31 Township 16 S Range 35 E
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

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

Name: LARRY GANDY

Title: Vice- President

Signature: 

Date: February 19, 2001

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

New Renewal Modification

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2. Operator: GANDY CORPORATION

Address: P.O. BOX 827, TATUM, NM 88267

Contact Person: LARRY GANDY Phone: (505) 398-4960

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DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS

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

New Renewal Modification

1. Type: BRINE STATION RECEIVED
FEB 22 1999

2. Operator: GANDY CORPORATION

Address: P.O. BOX 827, TATUM, NM 88267

Contact Person: LARRY GANDY Phone: (505) 398-4960

3. Location: SW /4 SW /4 Section 31 Township 16 S Range 35 E

Submit large scale topographic map showing exact location.

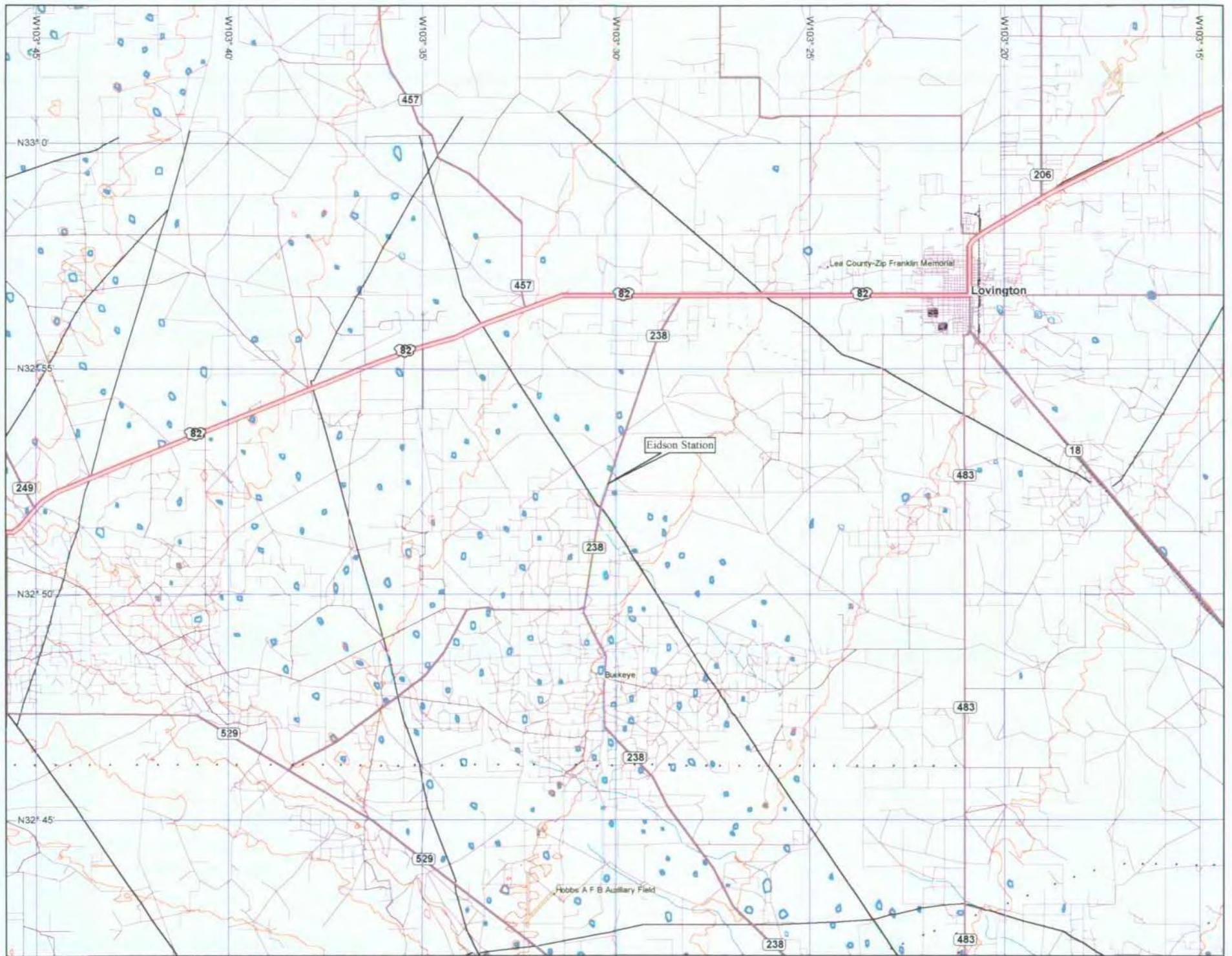
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
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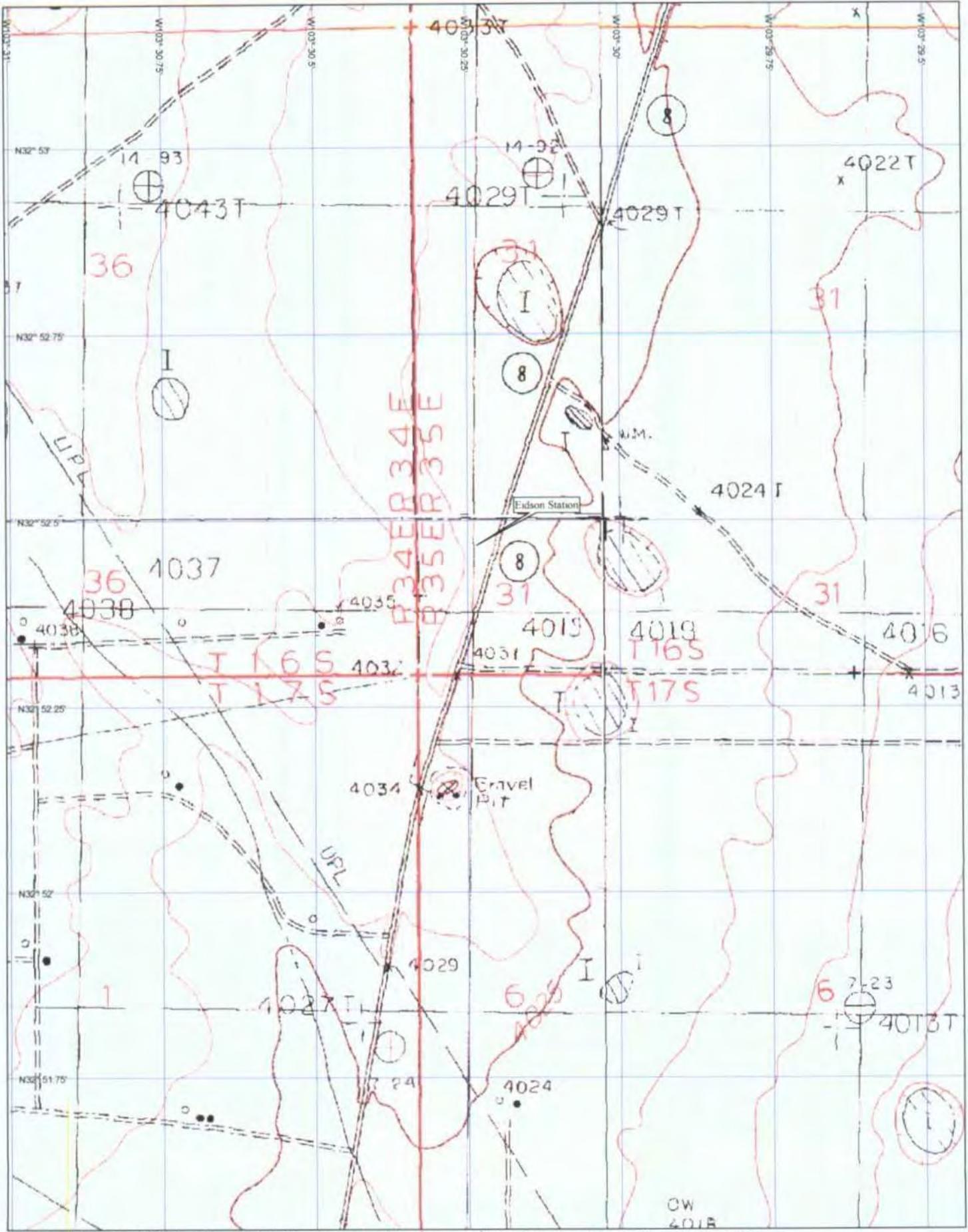
Name: LARRY GANDY

Title: Vice- President

Signature: 

Date: February 19, 2001





IV. Attach the name, telephone number and address of the landowner of the facility site.

Response: The landowner of this facility is the State of New Mexico. Gandy Corporation makes annual rental payments to the office of the Commissioner of Public Lands, P. O. Box 1148, Sante Fe, New Mexico 87504-1148. Phone: (505) 398-4960.

The facility was purchased by the Gandy Corporation from Wasserhund Incorporated on October 1, 2000.

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

Response: Enclosed are Exhibits 1, 2 and 3 providing a schematic of the facility, location of flow lines, and a process description.

Gandy Corporation
Eidson Brine Station
Exhibit 1
Site Schematic
Exhibit 2

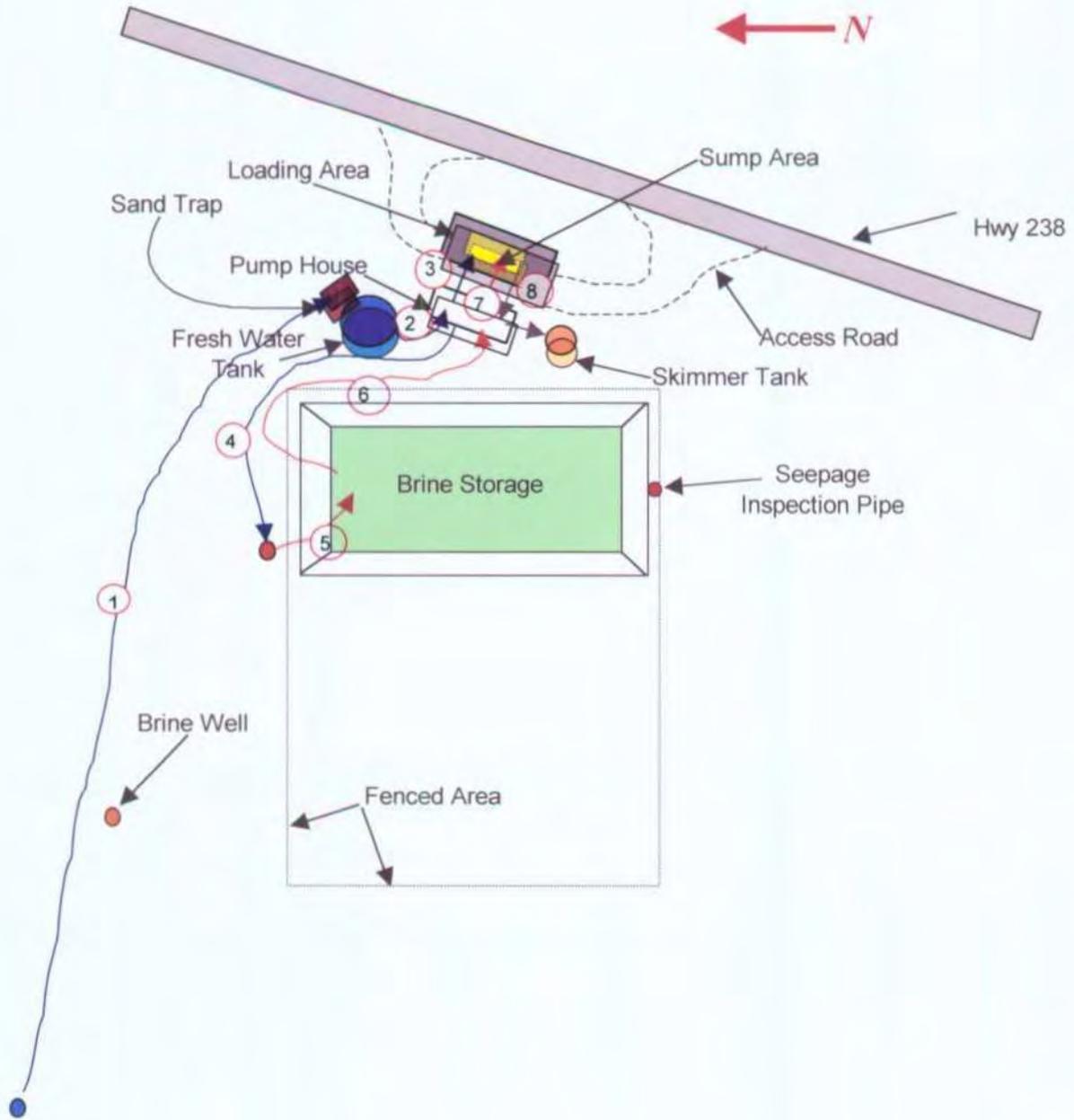


Exhibit 3
Eidson Brine Station
Process Description

1. Fresh water is pumped from a well through a sand filter and into a 500 barrel storage tank.
2. The fresh water is transferred from the storage tank to the pump house.
3. The fresh water may be pumped directly into an overhead truck loading system
4. Fresh water may also be diverted into the annulus of the brine well.
5. Brine water is pumped into an above grade reservoir.
6. The brine water is then diverted to the pump station.
7. The brine water is pumped through an overhead loading system directly into trucks.
8. Runoff or effluent is collected within a sump and automatically pumped into a 210 barrel tank where it is trucked off to commercial disposal.

VI. Attach a description of all materials stored or used at the facility.

Response: There are no materials stored or routinely used at this facility.

VII. Attach a description of present sources of effluent and solid waste. Average quality and daily volume of waste water must be included.

Response: The facility produces no solid waste. The average daily volume of effluent is 5 barrels per day. The quality of effluent is contained within Exhibit 4.

VIII. Attach a description of current liquid and solid waste collection / treatment / disposal procedures.

Response: Exhibit 5 shows a cement loading ramp complete with a concrete sump tank to catch any spills or overflows. In the event of a spill or overflow, an electrical automatic float switch activates a sump pump and any spillage or overflow is pumped into the elevated 210 barrel tank shown on exhibit 6. Water from this tank is pumped into and removed by transport trucks.

The site is automatically metered to the extent that water, brine and fresh, can be counted at any time. Low and high pressure switches are mounted on all lines, and in the event of a spill, break or overflow that the sump pump cannot handle, the facility shuts down completely and automatically.

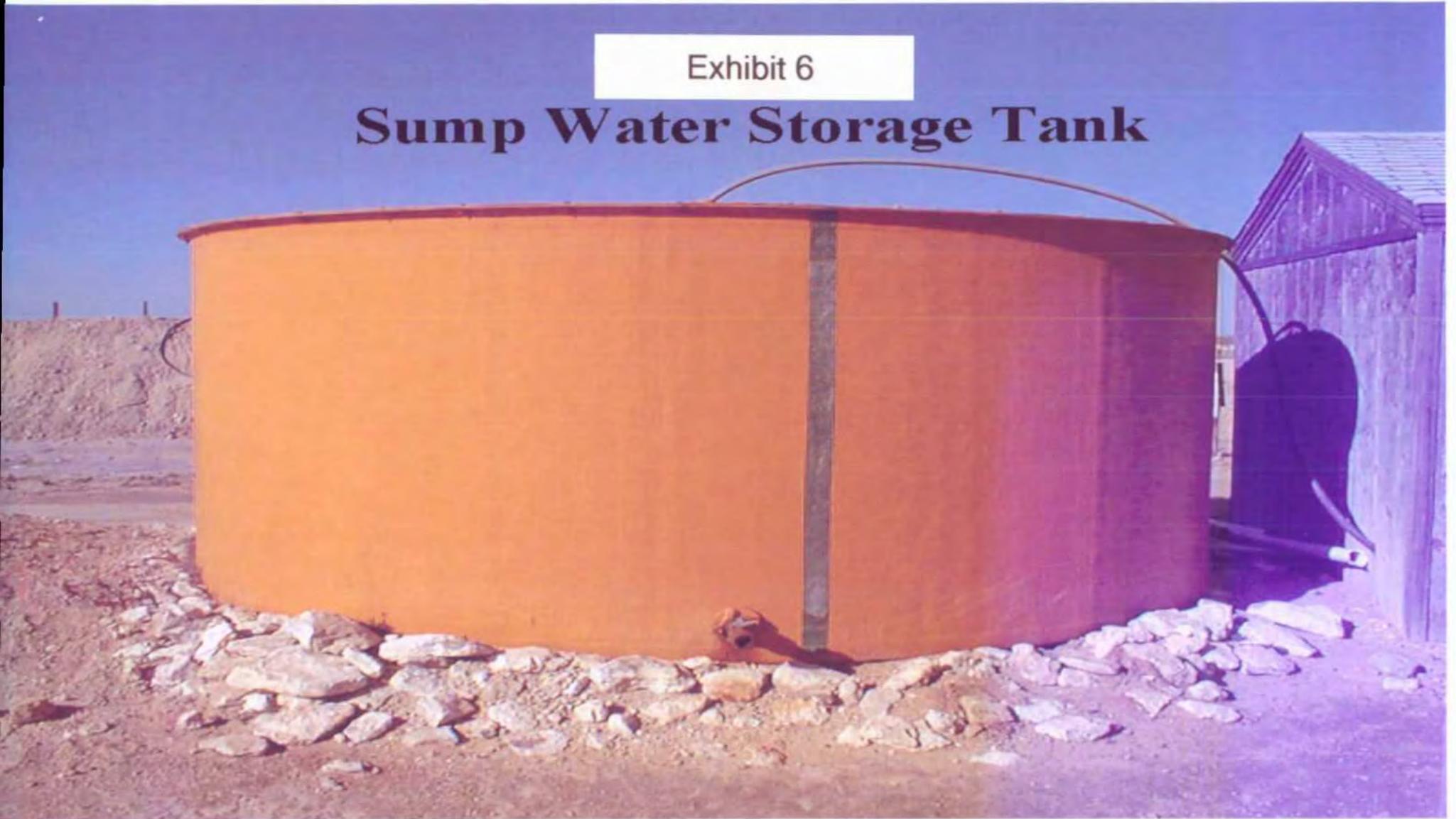
Exhibit 5

Detail of Sump Grating



Exhibit 6

Sump Water Storage Tank



IX. Attach a description of proposed modifications to existing collection / treatment / disposal systems.

Response: No modifications to the facility are planned at this time.

X. Attach a routine inspection and maintenance plan to insure permit compliance.

Response: The facility will be inspected on a weekly basis and after each heavy rainfall event. The inspection will look for any leaks, breaks, or spills. All pumps and flowlines will be inspected for obvious wear or damage.

XI. Attach a contingency plan for reporting and clean up of spills or releases.

Response: Gandy Corporation owns and operates backhoes, vacuum trucks and other construction equipment commonly employed on spill clean-ups. In the event of an unplanned release of brine water, Gandy will immediately notify the Hobbs office of the NMOCD and remove all free liquids. Such removed liquids will be sent to commercial disposal.

All impacted soils will be delineated as to both vertical and lateral extent and all affected soils removed to commercial disposal. Replacement soils will be re-deposited within the excavated area and compacted to match the surrounding topographical elevations.

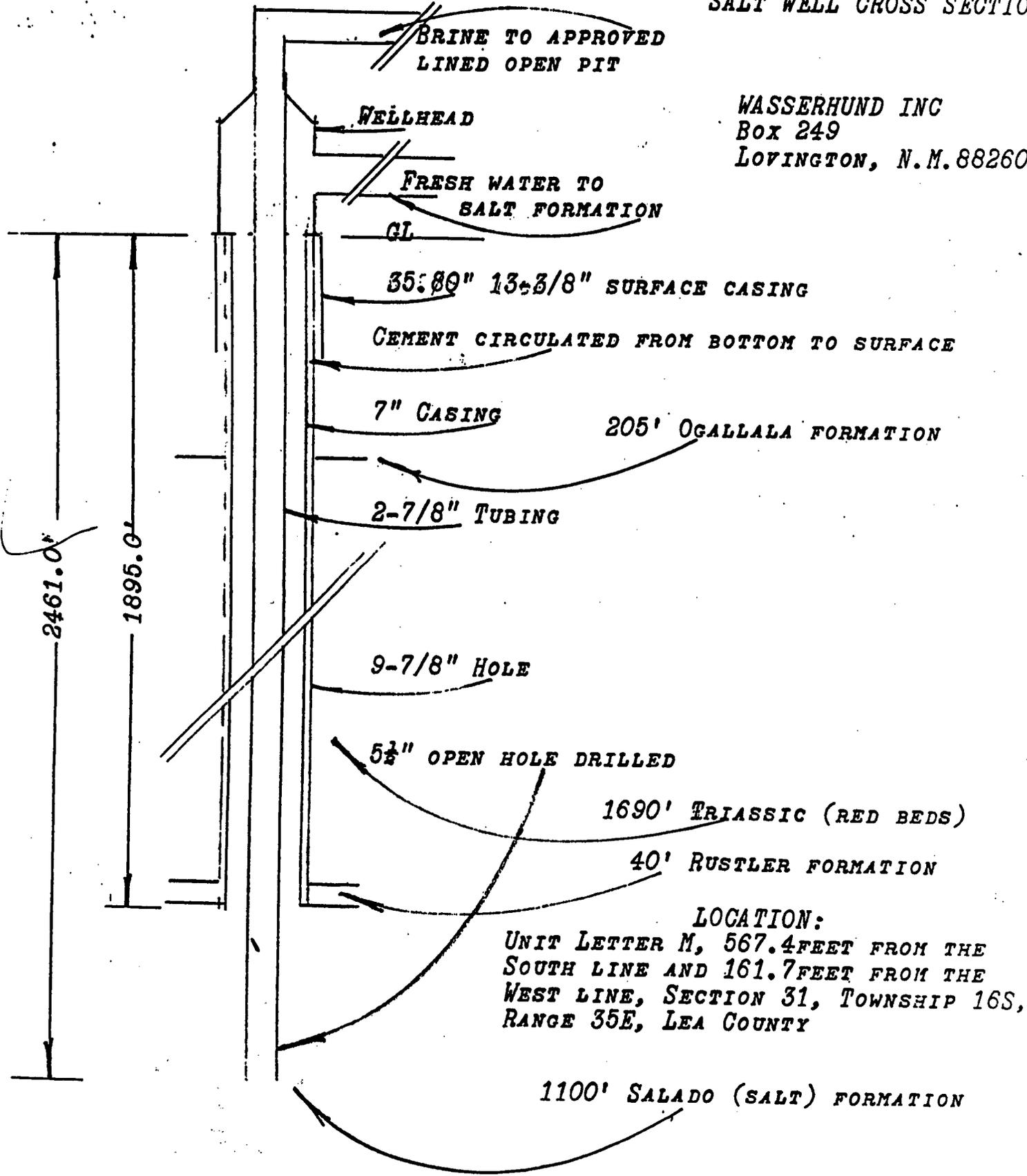
XII. Attach geological hydrological information for the facility. Depth to and quality of groundwater must be included

Response: Exhibit 7 provides a cross section of the brine well. The quality of the well water is provided within Exhibit 4.

Exhibit 7

SALT WELL CROSS SECTION

WASSERHUND INC
Box 249
LOVINGTON, N.M. 88260



XIII. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and / or orders.

Response: There are five closure issues within this facility.

- A. Wells:** At abandonment, the brine extraction well will be plugged in accordance with all appropriate state law.
- B. Lined Storage Reservoir Fluids:** At abandonment, all non-commercial grade fluids contained within the lined surface impoundment will be collected and transported to a licensed disposal facility.
- C. Lined Surface Reservoir Solids:** The plastic liner and associated solids consisting primarily of sodium chloride contaminated blow sands will be transported to a licensed commercial facility for disposal.
- D. Tanks and Ancillary Equipment:** Storage tanks, pumps, fencing materials, piping and other structures will be removed from the site. The final disposition of these materials is dependant on their condition at the dime of dismantlement. Cement structures will be removed and transported to commercial disposal.
- E. Contaminated Soils:** After all surface structures are removed from the facility, the soils will be analyzed for the presence and concentrations of total petroleum hydrocarbons, benzene, toluene, ethylbenzene, xylene and chlorides. All soils containing criteria contaminant concentrations in excess of NMOCD closure guidelines will either be remediated in accordance NMOCD spill closure guidelines or transported to commercial disposal.

Quarterly reports for both fresh and brine water produced are sent to the proper authorities. Fresh water reporting goes to the State Engineer Office, 1900 West Second Street, Roswell, New Mexico 88201. Brine water reporting goes to the Commissioner of Public Lands, Box 1148, Sante Fe, New Mexico 87504. Fresh and brine water reporting goes to the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Sante Fe, New Mexico 87504.

Exhibits

- Exhibit 1: Plat map of the facility.
- Exhibit 2: Flow Schematic of the facility.
- Exhibit 3: Narrative of flow schematic.
- Exhibit 4: Chain of custody and laboratory analytical results of fresh and produced brine waters.
- Exhibit 5: Photograph of sump grate.
- Exhibit 6: Photograph of sump water storage tank.
- Exhibit 7: Schematic cross section of the brine well.

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

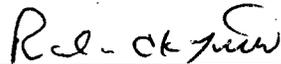
WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: See Below

ELT#	FIELD CODE	Sulfate mg/L	Chloride mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L	Conductivity uS/cm
35143	Salt Water	3113	221563	<2	78	332232	164200
35144	Fresh Water	60.2	35	<2	146	318	590
	QUALITY CONTROL	50.5	5318	*	*	*	1432
	TRUE VALUE	50.0	5000	*	*	*	1413
	% PRECISION	101	106	*	*	*	101
	BLANK	<0.5	<10	<2	<2	<5	*
	ANALYSIS DATE	12/13/00	12/12/00	12/12/00	12/12/00	12/11/00	12/12/00

METHODS: EPA 375.4, 325.3, 310, 160.1, 120.1


Raland K. Tuttle

12-27-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

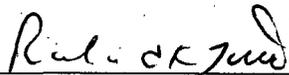
Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: 12/12/00

ELT#	FIELD CODE	pH s.u.	Hardness mg/L	Specific Gravity @ 60 deg F
35143	Salt Water	6.88	42000	1.185
35144	Fresh Water	8.42	650	1.000

QUALITY CONTROL	7.02	*	*
TRUE VALUE	7.00	*	*
% PRECISION	100	*	*
BLANK	*	<10	*

METHODS: EPA 150.1, 130.2


Raland K. Tuttle

12-27-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

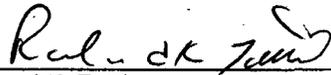
WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: 12/12, 12/14,
12/20/00

ELT#	FIELD CODE	Ca mg/L	Mg mg/L	Fe mg/L	Ba mg/L
35143	Salt Water	2328	7885	1.44	<0.10
35144	Fresh Water	34.2	9.52	0.18	<0.10
QUALITY CONTROL		10.29	4.91	0.99	2.01
TRUE VALUE		10.00	5.00	1.00	2.00
% PRECISION		103	93	99	100
BLANK		<0.10	<0.10	<0.03	<0.10

METHODS: SM 7000 series


Raland K. Tuttle

12-27-00
Date

Environmental Lab of Texas, Inc.

12600 West I-20 East
Odessa, Texas 79763

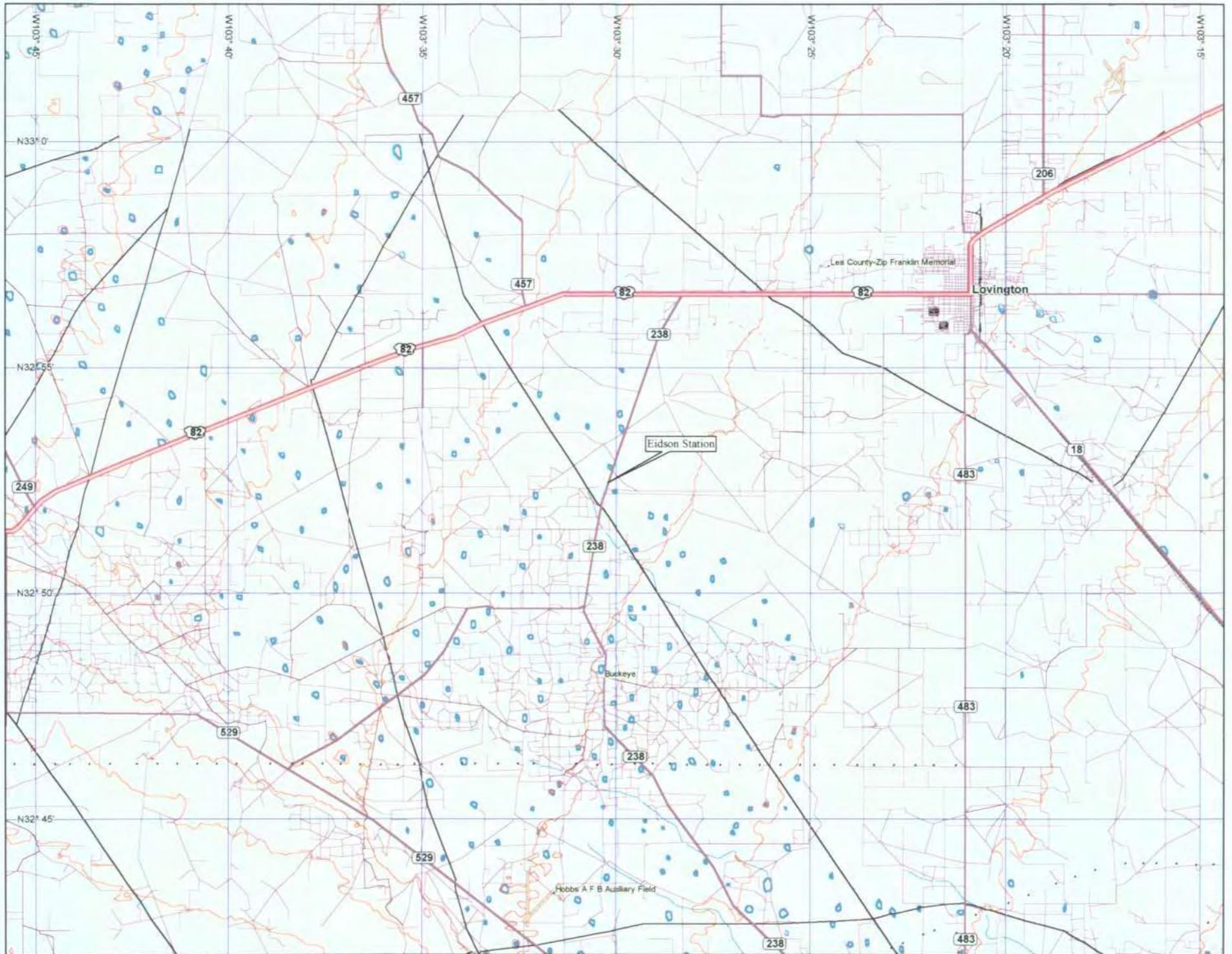
Phone: 915-563-1800
Fax: 915-563-1713

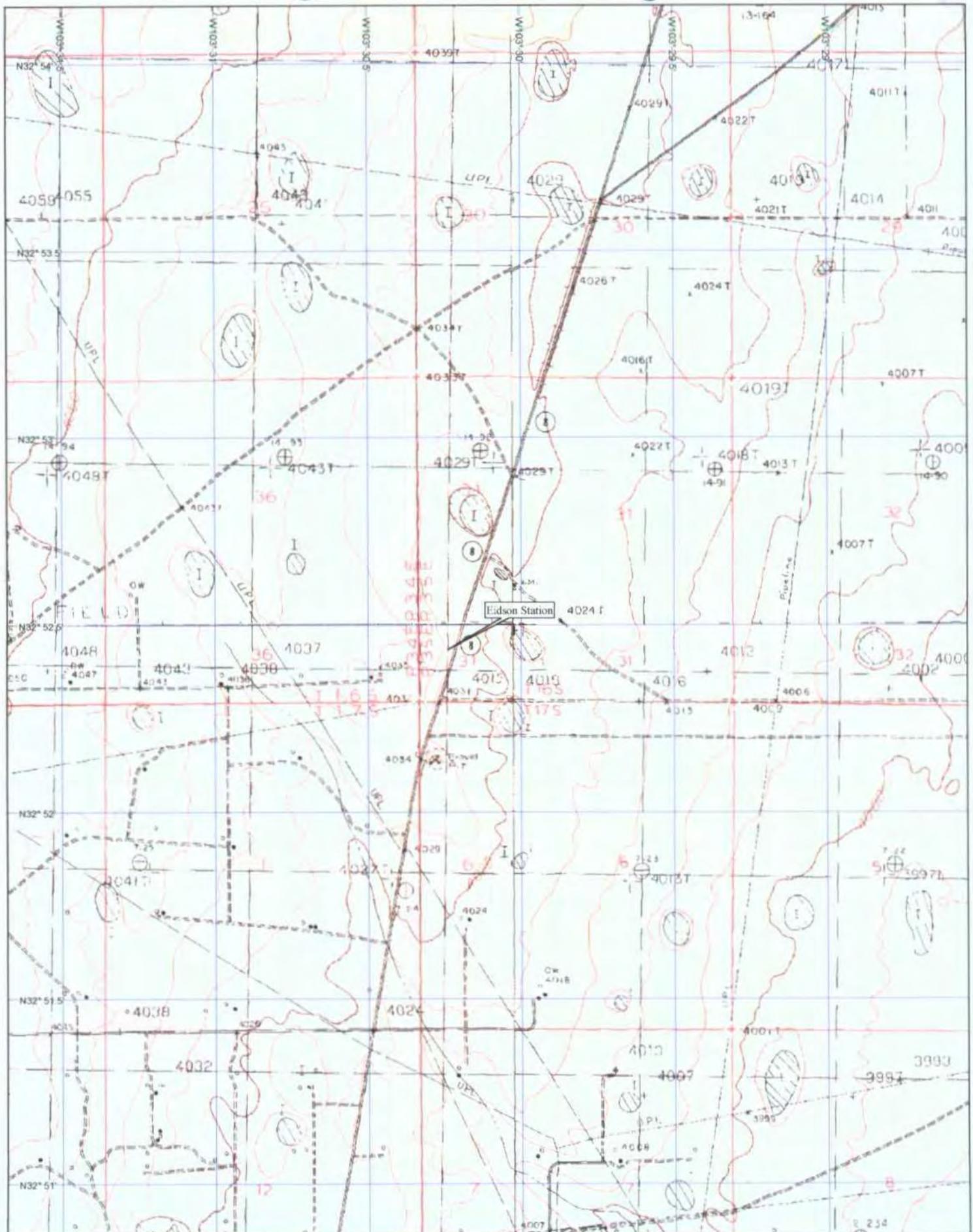
CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: M. Griffin
 Company Name: Whole Earth Environmental
 Company Address: _____
 City/State/Zip: _____
 Telephone No: 800-854-4358 Fax No: 281-646-8996
 Sampler Signature: _____

Project Name: Edison Station
 Project #: _____
 Project Loc: _____
 PO #: _____

LAB # (lab use only)	FIELD CODE	Date Sampled	Time Sampled	No. of Containers	Preservative							Matrix				Analyze For:													
					Ice	HNO ₃ - metals	HCl	NaOH	H ₂ SO ₄	None	Other (Specify) None	Water	Sludge	Soil	Other (specify):	(D) CL / SAR / EC	TPH 418.1	TPH TX 1005/1006	TPH 8015M GRO/DRO	Metals: As, Pb, Cd, Cr, Pb, Hg, Se	Volatiles	Semivolatiles	BTEX 8021B/5030	Chlorides, SO ₄	pH, Alk, CO ₂ /HCO ₃	Hardness	Mg, Ca, Fe, Ba	Spec. Gravity	RUSH TAT (Pre-Schedule)
35143	Salt Water	12-4	9:40	2	X	X						X												X	X	X	X		
35144	Fresh Water	12-4	9:46	2	X	X						X												X	X	X	X		
Special Instructions:															Sample Containers Intact? <input checked="" type="checkbox"/> N Temperature Upon Receipt: <u>Rec 4°C</u> Laboratory Comments: <u>* = as per M. Griffin 12-11-00</u>														
Relinquished by: <u>M. Griffin</u>	Date: <u>12-09-00</u>	Time: <u>1230</u>	Received by:					Date:	Time:																				
Relinquished by: _____	Date:	Time:	Received by ELOT: <u>J. [Signature]</u>					Date: <u>12-09-00</u>	Time: <u>1230</u>																				





IV. Attach the name, telephone number and address of the landowner of the facility site.

Response: The landowner of this facility is the State of New Mexico. Gandy Corporation makes annual rental payments to the office of the Commissioner of Public Lands, P. O. Box 1148, Sante Fe, New Mexico 87504-1148. Phone: (505) 398-4960.

The facility was purchased by the Gandy Corporation from Wasserhund Incorporated on October 1, 2000.

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

Response: Enclosed are Exhibits 1, 2 and 3 providing a schematic of the facility, location of flow lines, and a process description.

Gandy Corporation
Eidson Brine Station
Exhibit 1
Site Schematic
Exhibit 2

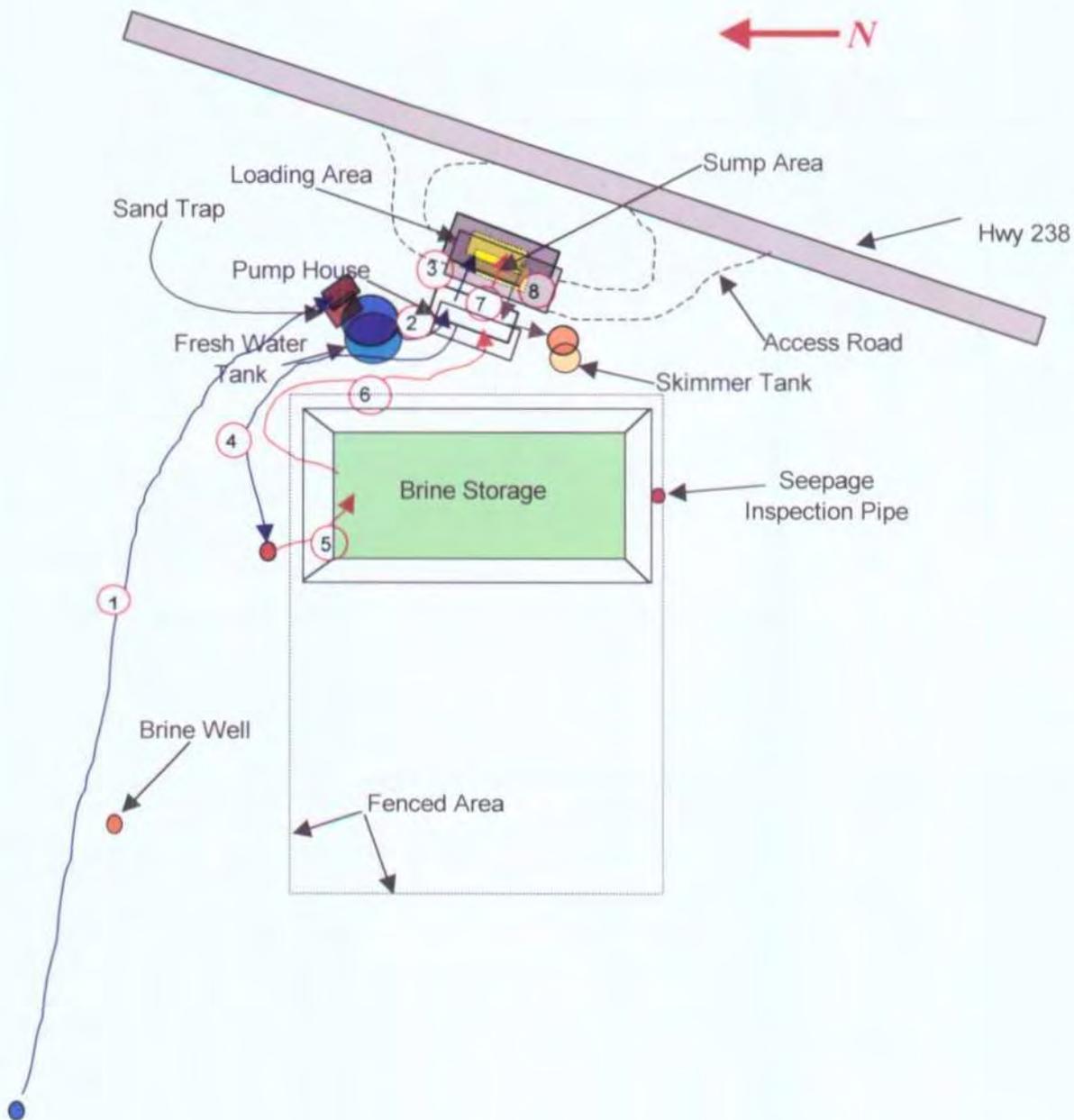


Exhibit 3
Eidson Brine Station
Process Description

1. Fresh water is pumped from a well through a sand filter and into a 500 barrel storage tank.
2. The fresh water is transferred from the storage tank to the pump house.
3. The fresh water may be pumped directly into an overhead truck loading system
4. Fresh water may also be diverted into the annulus of the brine well.
5. Brine water is pumped into an above grade reservoir.
6. The brine water is then diverted to the pump station.
7. The brine water is pumped through an overhead loading system directly into trucks.
8. Runoff or effluent is collected within a sump and automatically pumped into a 210 barrel tank where it is trucked off to commercial disposal.

VI. Attach a description of all materials stored or used at the facility.

Response: There are no materials stored or routinely used at this facility.

VII. Attach a description of present sources of effluent and solid waste. Average quality and daily volume of waste water must be included.

Response: The facility produces no solid waste. The average daily volume of effluent is 5 barrels per day. The quality of effluent is contained within Exhibit 4.

VIII. Attach a description of current liquid and solid waste collection / treatment / disposal procedures.

Response: Exhibit 5 shows a cement loading ramp complete with a concrete sump tank to catch any spills or overflows. In the event of a spill or overflow, an electrical automatic float switch activates a sump pump and any spillage or overflow is pumped into the elevated 210 barrel tank shown on exhibit 6. Water from this tank is pumped into and removed by transport trucks.

The site is automatically metered to the extent that water, brine and fresh, can be counted at any time. Low and high pressure switches are mounted on all lines, and in the event of a spill, break or overflow that the sump pump cannot handle, the facility shuts down completely and automatically.

Exhibit 5

Detail of Sump Grating

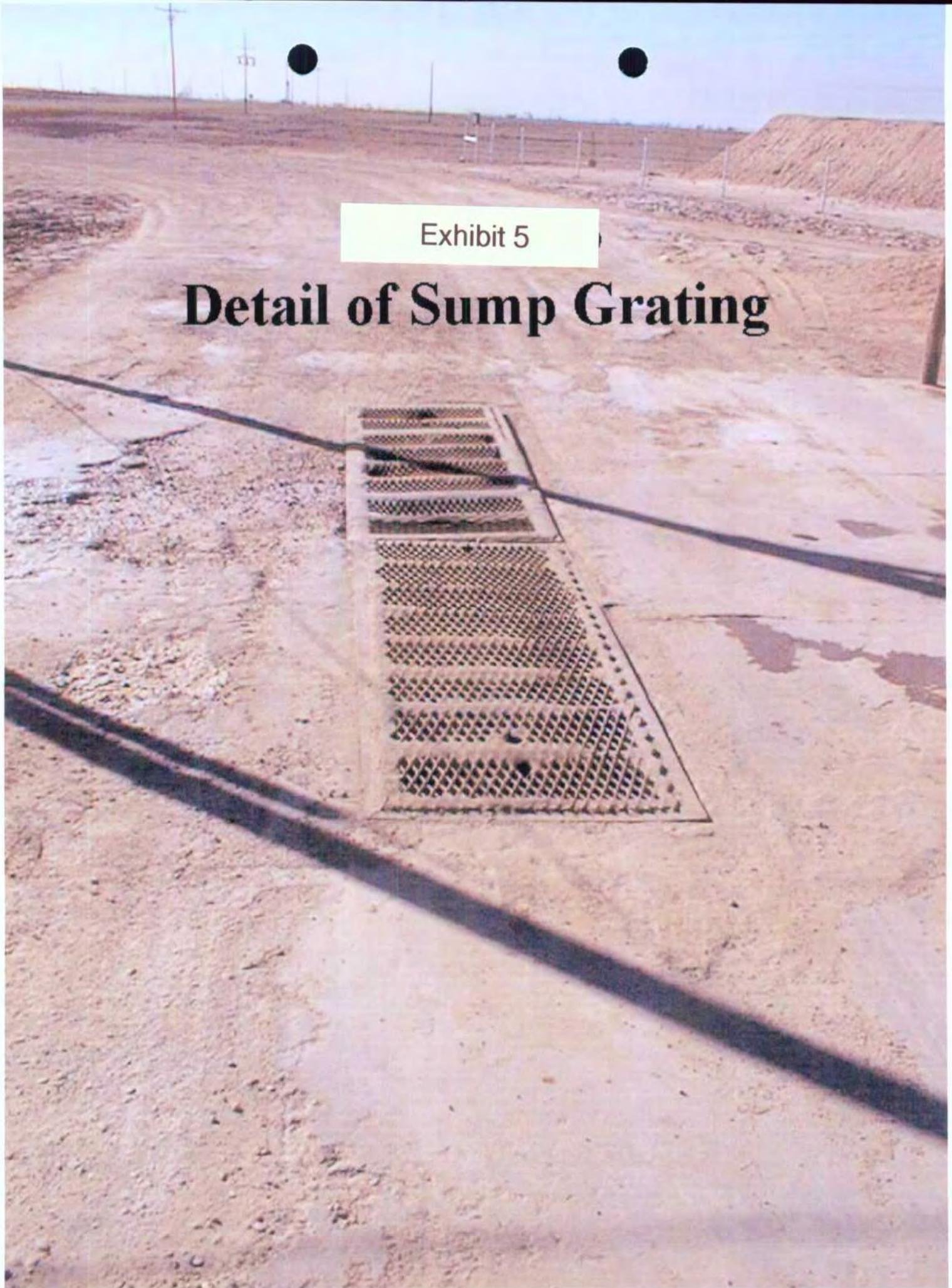
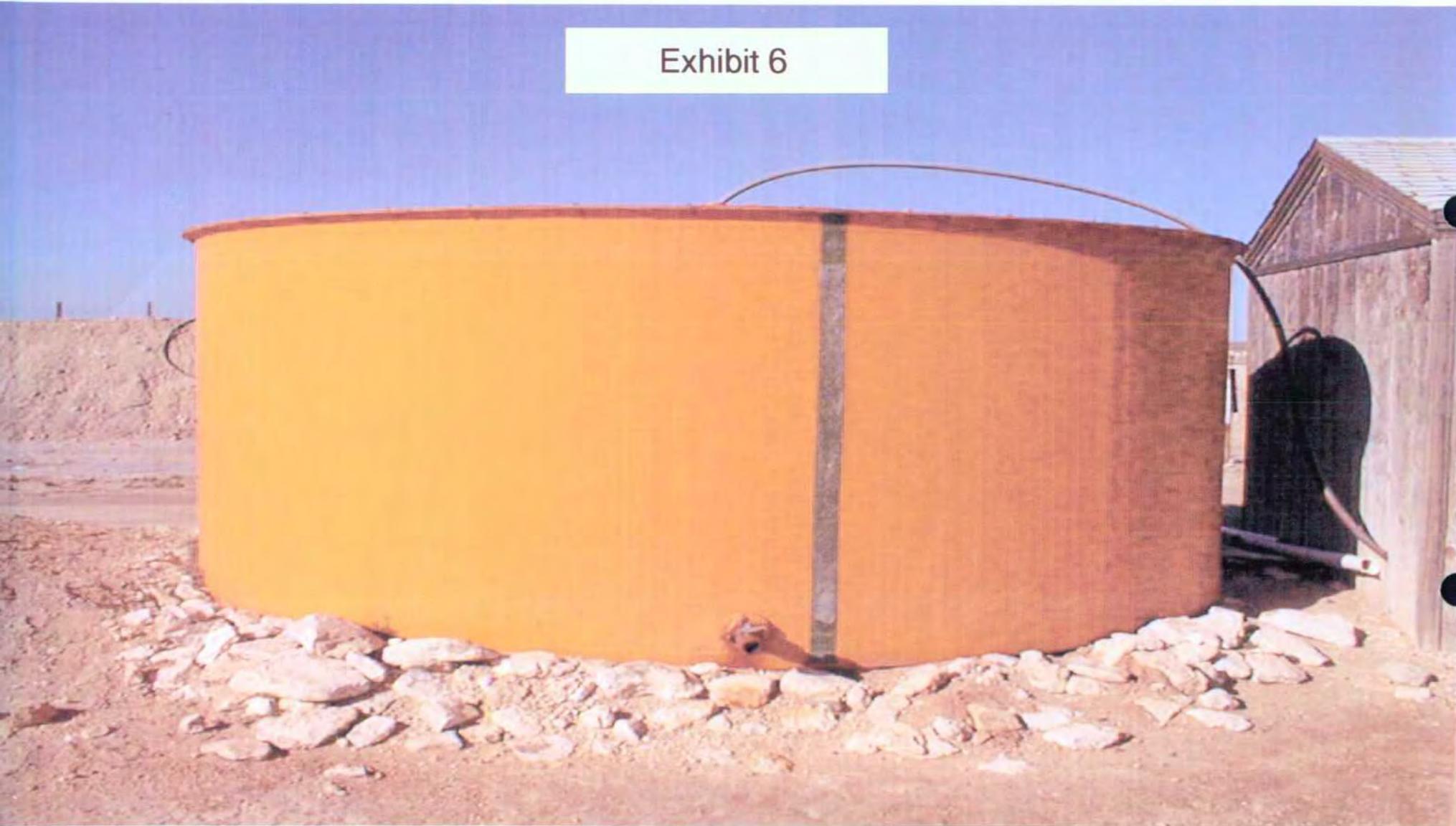


Exhibit 6



IX. Attach a description of proposed modifications to existing collection / treatment / disposal systems.

Response: No modifications to the facility are planned at this time.



X. Attach a routine inspection and maintenance plan to insure permit compliance.

Response: The facility will be inspected on a weekly basis and after each heavy rainfall event. The inspection will look for any leaks, breaks, or spills. All pumps and flowlines will be inspected for obvious wear or damage.

XI. Attach a contingency plan for reporting and clean up of spills or releases.

Response: Gandy Corporation owns and operates backhoes, vacuum trucks and other construction equipment commonly employed on spill clean-ups. In the event of an unplanned release of brine water, Gandy will immediately notify the Hobbs office of the NMOCD and remove all free liquids. Such removed liquids will be sent to commercial disposal.

All impacted soils will be delineated as to both vertical and lateral extent and all affected soils removed to commercial disposal. Replacement soils will be re-deposited within the excavated area and compacted to match the surrounding topographical elevations.

XII. Attach geological hydrological information for the facility. Depth to and quality of groundwater must be included

Response: Exhibit 7 provides a cross section of the brine well. The quality of the well water is provided within Exhibit 4.

SALT WELL CROSS SECTION

Exhibit 7

MASSERHUND INC
Box 249
Lovington, N.M. 88260

BRINE TO APPROVED
LINED OPEN PIT

WELLHEAD

FRESH WATER TO
SALT FORMATION

35:80" 13-3/8" SURFACE CASING

CEMENT CIRCULATED FROM BOTTOM TO SURFACE

7" CASING
205' OGALLALA FORMATION

2-7/8" TUBING

9-7/8" HOLE

5 1/2" OPEN HOLE DRILLED

1690' TRIASSIC (RED BEDS)

40' RUSTLER FORMATION

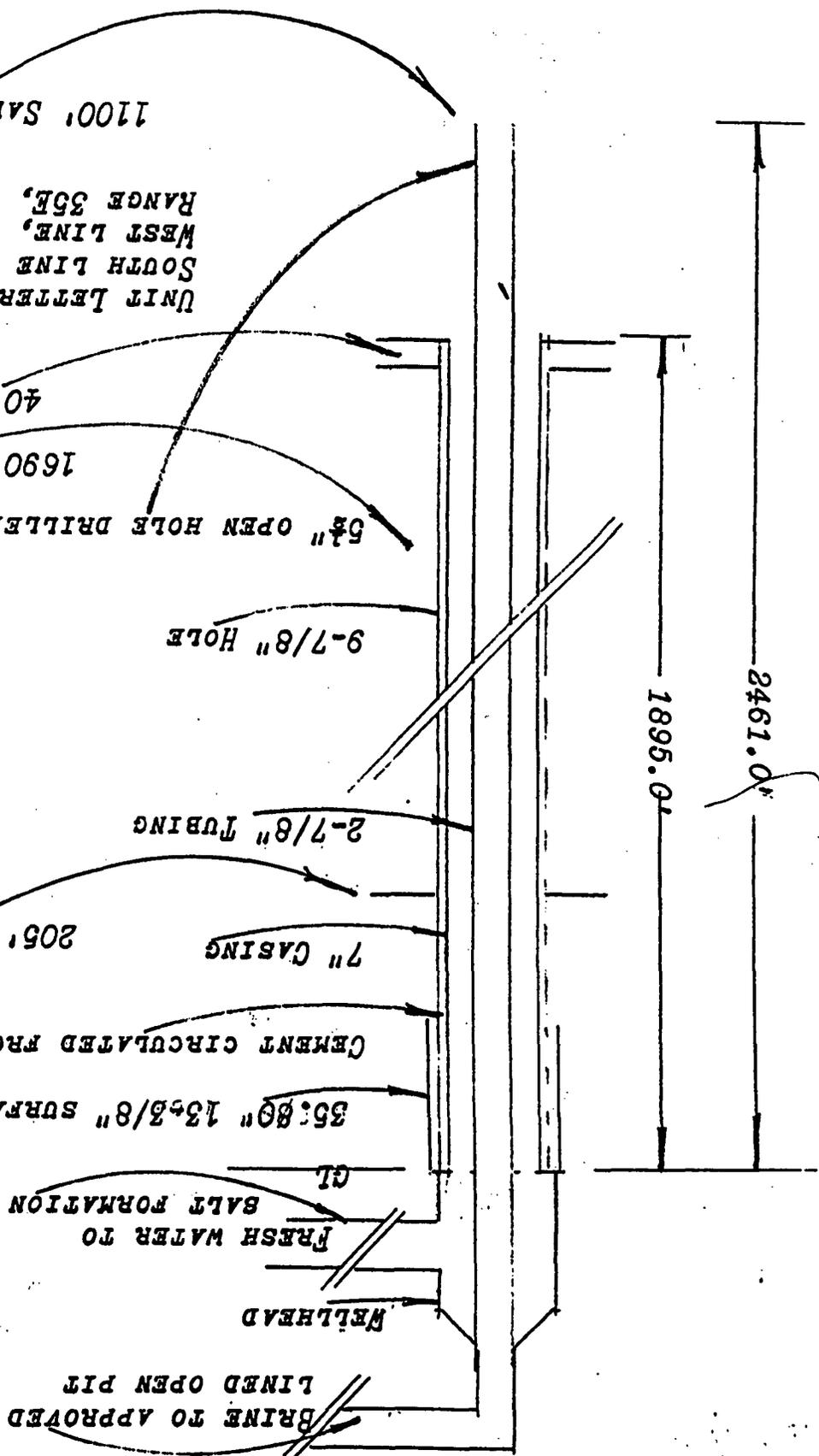
LOCATION:

UNIT LETTER M, 567.4 FEET FROM THE
SOUTH LINE AND 161.7 FEET FROM THE
WEST LINE, SECTION 31, TOWNSHIP 16S,
RANGE 35E, LEA COUNTY

1100' SALADO (SALT) FORMATION

1895.0'

2461.0'



XIII. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and / or orders.

Response: There are five closure issues within this facility.

- A. Wells:** At abandonment, the brine extraction well will be plugged in accordance with all appropriate state law.
- B. Lined Storage Reservoir Fluids:** At abandonment, all non-commercial grade fluids contained within the lined surface impoundment will be collected and transported to a licensed disposal facility.
- C. Lined Surface Reservoir Solids:** The plastic liner and associated solids consisting primarily of sodium chloride contaminated blow sands will be transported to a licensed commercial facility for disposal.
- D. Tanks and Ancillary Equipment:** Storage tanks, pumps, fencing materials, piping and other structures will be removed from the site. The final disposition of these materials is dependant on their condition at the time of dismantlement. Cement structures will be removed and transported to commercial disposal.
- E. Contaminated Soils:** After all surface structures are removed from the facility, the soils will be analyzed for the presence and concentrations of total petroleum hydrocarbons, benzene, toluene, ethylbenzene, xylene and chlorides. All soils containing criteria contaminant concentrations in excess of NMOCD closure guidelines will either be remediated in accordance NMOCD spill closure guidelines or transported to commercial disposal.

Quarterly reports for both fresh and brine water produced are sent to the proper authorities. Fresh water reporting goes to the State Engineer Office, 1900 West Second Street, Roswell, New Mexico 88201. Brine water reporting goes to the Commissioner of Public Lands, Box 1148, Sante Fe, New Mexico 87504. Fresh and brine water reporting goes to the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Sante Fe, New Mexico 87504.

Exhibits

- Exhibit 1: Plat map of the facility.
- Exhibit 2: Flow Schematic of the facility.
- Exhibit 3: Narrative of flow schematic.
- Exhibit 4: Chain of custody and laboratory analytical results of fresh and produced brine waters.
- Exhibit 5: Photograph of sump grate.
- Exhibit 6: Photograph of sump water storage tank.
- Exhibit 7: Schematic cross section of the brine well.

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

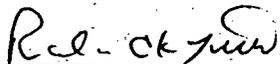
Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: See Below

ELT#	FIELD CODE	Sulfate mg/L	Chloride mg/L	Carbonate mg/L	Bicarbonate mg/L	TDS mg/L	Conductivity uS/cm
35143	Salt Water	3113	221563	<2	78	332232	164200
35144	Fresh Water	60.2	35	<2	146	318	590

QUALITY CONTROL	50.5	5318	*	*	*	1432
TRUE VALUE	50.0	5000	*	*	*	1413
% PRECISION	101	106	*	*	*	101
BLANK	<0.5	<10	<2	<2	<5	*

ANALYSIS DATE	12/13/00	12/12/00	12/12/00	12/12/00	12/11/00	12/12/00
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METHODS: EPA 375.4, 325.3, 310, 160.1, 120.1


Raland K. Tuttle

12-27-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

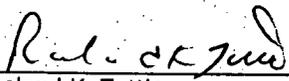
Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: 12/12/00

ELT#	FIELD CODE	pH s.u.	Hardness mg/L	Specific Gravity @ 60 deg F
35143	Salt Water	6.88	42000	1.185
35144	Fresh Water	8.42	650	1.000

QUALITY CONTROL	7.02	*	*
TRUE VALUE	7.00	*	*
% PRECISION	100	*	*
BLANK	*	<10	*

METHODS: EPA 150.1, 130.2


Raland K. Tuttle

12-27-00
Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

WHOLE EARTH ENVIRONMENTAL
ATTN: MR. MIKE GRIFFIN
19606 SAN GABRIEL
HOUSTON, TEXAS 77084
FAX: 281-646-8996

Sample Type: Water
Sample Condition: Intact/ 4 deg. C
Project #: None Given
Project Name: Eidson Station
Project Location: None Given

Sampling Date: 12/04/00
Receiving Date: 12/09/00
Analysis Date: 12/12, 12/14,
12/20/00

ELT#	FIELD CODE	Ca mg/L	Mg mg/L	Fe mg/L	Ba mg/L
35143	Salt Water	2328	7885	1.44	<0.10
35144	Fresh Water	34.2	9.52	0.18	<0.10

QUALITY CONTROL	10.29	4.91	0.99	2.01
TRUE VALUE	10.00	5.00	1.00	2.00
% PRECISION	103	93	99	100
BLANK	<0.10	<0.10	<0.03	<0.10

METHODS: SM 7000 series


Raland K. Tuttle

12-27-00
Date



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone X
Personal _____
E-Mail X gandy2@leaco.net
FAX: _____

12/21/2000

Originating Party: Wayne Price-OCD

Other Parties: Larry Gandy-Gandy Corp.

Subject: Discharge Plan Renewal Notice for the following Facilities:

BW-004 Wasserhund (Edison-Ranch) expires 6/11/01
GW-___ Name expires
GW-___ Name expires
GW-___ Name expires

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with \$50.00 filing fee for the above listed facilities.

Conclusions or Agreements:

Signed: _____

GANDY CORPORATION

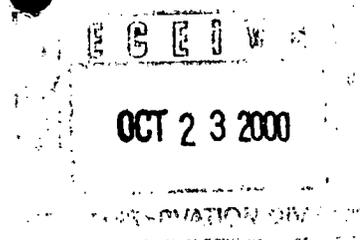
OILFIELD SERVICES

P.O. BOX 827

TATUM, NEW MEXICO 88267

(505) 398-4960

FAX -505-398-6887



October 19, 2000

Wayne Price
NM Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Mr. Price:

Effective October 1, 2000 Gandy Corporation purchased the Wasserhund Eidson Brine Station. Legal Description is Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico.

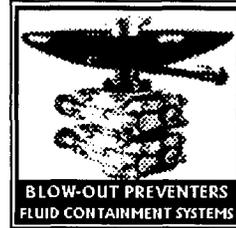
Please send all future correspondence to Gandy Corporation.

Sincerely Yours,

A handwritten signature in cursive script that reads "Larry Gandy".

Larry Gandy

D & L Meters & Instrument Service, Inc.
P.O. Box 1621
Lovington, NM 88260
(505) 396-3715 FAX (505) 396-5812



Wednesday, October 27, 1999

**Wasserhund Inc.
Mr. Pete Haseloff**

10:13 a.m.

Testing verification on 1000# Pressure Recorder

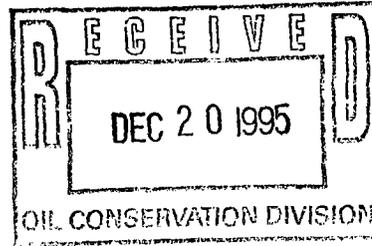
Tested at midrange (550 psi) to an accuracy of + or - 5%

**Kenneth L. Wallace
President**



**Kenneth L. Wallace
President**

December 18, 1995



Mr. Mark Ashley
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

SUBJECT: Wasserhund Inc. BW-004

Dear Mark:

Find enclosed application for discharge plan renewal for Wasserhund Inc., BW-004 Brine facility. Also enclosed is check for filing fee.

If additional information is needed or you have any questions, please call.

Have a Happy Holiday.

Sincerely,

Eddie W Seay

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

WASSERHUND INC.

P. O. BOX 249 396-3128
LOVINGTON, NM 88260

95-108/1122
6

12-15-95 19

PAY TO THE ORDER OF NMED-Water Quality Management \$ 50.00

Fifty and No/100----- DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS.

filing fee			
Discharge Plan BW-004			

[Signature]

GUARDIAN SAFETY

Western
Commerce
Bank
Langston, NM

501

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES
(Refer to OCD Guidelines for assistance in completing the application.)

NEW RENEWAL Discharge Plan
BW-004

- I. FACILITY NAME: Wasserhund Eidson Brine Station
- II. OPERATOR: Wasserhund Incorporated
ADDRESS: P. O. Box 249, Lovington, NM 88260
CONTACT PERSON: Jack C Hunter PHONE: (505) 396 3128
- III. LOCATION: SW /4 SW /4 Section 31 Township 16 S Range 35 E
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner of the facility site.
- V. Attach a description of the types and quantities of fluids at the facility.
- VI. Attach a description of all fluid transfer and storage and fluid and solid disposal facilities.
- VII. Attach a description of underground facilities (i.e. brine extraction well).
- VIII. Attach a contingency plan for reporting and clean-up of spills or releases.
- IX. Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water.
- X. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XI. CERTIFICATION

I hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Name: J. E. Haseloff Title: President

Signature:  Date: 11-21-95

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

WASSERHUND INCORPORATED
P. O. Box 249
921 South Love
Lovington. New Mexico 88260

November 27, 1995

State of New Mexico
Energy, Minerals and Natural Resources Department
P. O. Box 2088
Santa Fe. New Mexico 87501

RE: Renewal
Discharge Plan
BW-004

Dear Sir:

Submitted herewith is a detailed narrative for the above mentioned renewal of our brine well.

Wasserhund Incorporated commenced production of brine water in October 1980 at this facility site. The landowner of this facility site is the State of New Mexico. Wasserhund Incorporated makes annual rental payments to the office of the Commissioner of Public Lands, P. O. Box 1148, Santa Fe, New Mexico 87504-1148.

The average quality of the brine water is 10 pounds per gallon. The Quantity of water produced in the years 1993 and 1994 has been 464,961 barrels with an average of 19,373 barrels per month. The most current fresh and brine water analysis is Exhibit 1. The Monitor well inspection logs is Exhibit 2.

Fresh water is pumped from a well shown in Exhibits 3, 4, 5, 6, 7 and 11 to a 500 barrel storage tank shown in Exhibits 4, 5 and 15. From this tank fresh water is drawn through a 7½ HP pump directly to an overhead truck loading system shown in Exhibits 4, 8 and 18. Fresh water is also drawn from this tank and is pumped under 390# pressure down to the salt section of the brine well shown in Exhibits 4, 5, 9, 12 and 14. Brine water is returned through the tubing and deposited in an open lined reservoir holding 11,000 barrels as shown in Exhibits 4, 5, 10, 20 and 21. From this lined reservoir brine water is drawn through a 7½ HP pump directly to an overhead truck loading system shown in Exhibits 4, 8, 13 and 20. Exhibits 4, 5, 8 and 18 show a concrete loading ramp complete with a concrete sump tank to catch any spills or overflows. In the event of a spill or overflow, an electrical automatic float switch activates a sump pump and any spillage

Oil Conservation Division
Page 2
November 27, 1995

or overflow is pumped into the elevated 210 barrel tank shown in Exhibit 19. Water from this tank is pumped into and removed from location by transport trucks.

Wasserhund Incorporated is automatically metered to the extent that water, brine and fresh, can be counted at any time. Low and high pressure switches are mounted on all lines, and in the event of a break, spill or overflow that the sump pump cannot handle, the facility shuts down completely and automatically. Some of the automation is shown in Exhibits 15 and 16.

Fresh water is obtained from the Ogallala formation by a well shown in Exhibits 3, 4, 5, 6, 7 and 11, and the fresh water analysis is Exhibit 2. Other fresh water wells in a two mile radius are shown on Exhibit 6.

The brine storage facility of Wasserhund Incorporated is elevated by an earth dike to a point at least 4 feet above ground level. There are no arroyos, creeks or rivers within 10 miles of the facility. See Exhibit 6.

Exhibit 9 shows the lithology beneath the brine facility. This information was obtained from the Oil Conservation Division office in Hobbs, New Mexico.

Quarterly reports for both fresh and brine water produced are sent to the proper authorities. Fresh water reporting goes to the State Engineer Office, 1900 West Second Street, Roswell, New Mexico 88201. Brine water reporting goes to the Commissioner of Public Lands, Box 1148, Santa Fe, New Mexico 87504. Fresh and brine water reporting goes to the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504.

Samples of fresh water can be taken as shown in Exhibits 13, 15 and 18. Brine water samples can be taken as shown in Exhibits 13 and 17.

This Discharge Plan is respectfully submitted.


Wasserhund Incorporated
J. E. Haseloff-President



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

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

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

CHEMICAL ANALYSIS OF WATER

Company : Wasserhund
 City, St.: Box 249
 Proj.Name:
 Location : Wasserhund Water Station
 Sample 1 : Fresh Water
 Sample 2 : Brine Water

Date: 12/11/95
 Lab #: H2310

<u>PARAMETER</u>	<u>RESULT 1</u>	<u>RESULT 2</u>	<u>mg/L</u>
pH	7.58	6.55	
Alkalinity	175	325	
Carbonate	-0-	-0-	
Bicarbonate (HCO ₃)	175	325	
Total Hardness	182	42,000	
Magnesium (Mg)	11.7	9,742	
Calcium (CaCO ₃)	51.8	1,931.8	
Chloride (Cl)	36	200,338	
Sulfate (SO ₄)	70.85	4,429.9	
Iron (Fe)	0.096	0.248	
Barium (Ba)	0.06	<0.1	
TDS (mg/L)	325	312,745	
Specific Gravity	0.9974	1.2230	
Conductivity (umhos/cm)	300	380,000	

Methods: 200.7

Mitch Irvin
 Mitch Irvin

12-11-95
 Date

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

Monitor Well Inspection Logs
From April 2, 1991 through November 19, 1995
As Follows

1991

1

DATE	NET/DRI	INITIALS
APR 2	✓	CLM
APR 9	✓	CLM
APR 16	✓	CLM
MAY 23	✓	CLM
JUNE 13	✓	CLM
JULY 9	✓	CLM

1991

2

DATE	NET/DRI	INITIALS
JULY 17	✓	CLM
JULY 21	✓	QCH
JULY 31	✓	CLM
AUG 5	✓	CLM
AUG 20	✓	CLM
SEPT 4	✓	CLM
SEPT 10	✓	CLM
SEPT 19	✓	CLM
OCT 3	✓	CLM
OCT 11	✓	CLM
OCT 17	✓	CLM
OCT 30	✓	CLM

1991
1992

3

DATE	NET	INITIALS
Nov 5	V	CLM
Nov 13	V	CLM
Nov 21	V	CLM
Nov 27	V	CLM
Dec 5	V	CLM
Dec 10	V	CLM
Dec 19	V	CLM
Dec 27	V	CLM
Dec 30	V	CLM
1992		
Jan 5	V	CLM
Jan 11	V	CLM
Jan 18	V	CLM
Jan 24	V	CLM
Feb 31	V	CLM
Feb 2	V	JCF

1992

4

DATE	NET	INITIALS
Jan 6	V	CLM
Jan 12	V	CLM
Feb 20	C	JCF
Feb 27	V	CLM
March 6	V	CLM
March 12	V	CLM
March 18	C	JCF
March 25	V	CLM
Apr 2	V	CLM
Apr 10	V	CLM
Apr 17	V	CLM
Apr 23	V	CLM
Apr 30	V	CLM
May 6	V	CLM
May 12	V	CLM

1992

5

DATE	NET	INITIALS
May 21	V	CLM
May 29	V	CLM
June 5	V	CLM
June 10	V	CLM
June 19	V	CLM
June 24	V	CLM
July 6	V	CLM
July 9	V	CLM
July 16	C	JCF
July 21	V	CLM
July 30	V	CLM
Aug 6	V	CLM
Aug 14	V	CLM
Aug 21	C	JCF
Aug 27	V	CLM

1992

6

DATE	NET	INITIALS
Sept 4	V	CLM
Sept 9	V	CLM
Sept 13	V	CLM
Sept 25	V	CLM
Oct 2	V	CLM
Oct 10	V	CLM
Oct 16	V	CLM
Oct 23	C	JCF
Oct 30	V	CLM
Nov 5	V	CLM
Nov 12	V	CLM
Nov 18	V	CLM
Nov 26	V	CLM
Dec 2	V	CLM
Dec 10	V	CLM

1992
1993

7

DATE	INITIALS
Dec 16	✓ CLM
Dec 23	✓ CLM
Dec 30	✓ CLM
<hr/>	
1993	
Jan 7	✓ CLM
Jan 13	✓ CLM
Jan 22	✓ CLM
Jan 28	✓ CLM
Feb 6	✓ CLM
Feb 13	✓ JCH
Feb 19	✓ CLM
Feb 26	✓ CLM
March 5	✓ CLM
March 8	✓ JCH

1993

8

DATE	INITIALS
March 11	✓ CLM
MAR 19	✓ JCH
March 25	✓ CLM
Apr 2	✓ CLM
Apr 8	✓ CLM
Apr 16	✓ CLM
Apr 22	✓ JCH
Apr 29	✓ CLM
May 3	✓ CLM
May 14	✓ CLM
May 20	✓ CLM
MAY 26	✓ JCH
MAY 31	✓ JCH
June 5	✓ JCH
June 11	✓ CLM

1993

9

DATE	INITIALS
June 17	✓ CLM
June 22	✓ JCH
June 28	✓ CLM
July 6	✓ CLM
July 14	✓ CLM
July 20	✓ CLM
July 24	✓ JCH
July 30	✓ JCH
Aug 5	✓ CLM
Aug 11	✓ CLM
Aug 19	✓ CLM
Aug 27	✓ CLM
Sept 7	✓ CLM
Sept 15	✓ CLM
Sept 24	✓ CLM

1993

10

DATE	INITIALS
Sept 30	✓ JCH
Oct 6	✓ CLM
Oct 13	✓ CLM
Oct 20	✓ CLM
Oct 27	✓ CLM
Nov 4	✓ CLM
Nov 11	✓ CLM
Nov 17	✓ CLM
Nov 24	✓ CLM
NOV 30	✓ JCH
Dec 4	✓ CLM
Dec 11	✓ CLM
Dec 21	✓ CLM
Dec 27	✓ CLM

11
1994

DATE	WET/REC	INITIALS
1-1-94	V	JCH
1-9-94	L	CLM
1-17-94	V	CLM
1-22-94	V	CLM
1-30-94	V	CLM
2-5-94	V	CLM
2-12-94	V	CLM
2-19-94	V	CLM
2-27-94	V	CLM
2-28-94	V	JCH
3-9-94	V	CLM
3-19-94	V	CLM
3-23-94	V	CLM
3-31-94	V	JCH
4-7-94	V	CEM

1994

DATE	WET/REC	INITIALS
4-16-94	V	CLM
4-22-94	V	JCH
4-30-94	V	CLM
5-6-94	V	CLM
5-14-94	V	CLM
5-20-94	V	CLM
5-27-94	V	CLM
5-31-94	V	JCH
6-6-94	V	CLM
6-11-94	V	CLM
6-15-94	V	JCH
6-19-94	V	JCH
6-25-94	V	CLM
7-6-94	V	CLM
7-12-94	V	CLM
7-21-94	V	CLM

1994

DATE	WET/REC	INITIALS
7-29-94	V	CLM
8-4-94	V	CLM
8-12-94	L	CLM
8-26-94	V	CLM
8-26-94	V	CLM
9-2-94	V	CLM
9-9-94	L	CLM
9-15-94	V	CLM
9-21-94	V	CLM
9-27-94	V	CLM
10-4-94	V	CLM
10-11-94	V	CLM
10-21-94	V	CLM
10-28-94	V	CLM
11-5-94	L	CLM
11-12-94	V	CLM

12

DATE	WET/REC	INITIALS
11-19-94	V	CLM
11-27-94	V	CLM
12-5-94	V	CLM
12-12-94	V	CLM
12-20-94	V	CLM
12-27-94	V	CLM
1-4-95	V	CLM
1-12-95	L	CLM
1-18-95	V	CLM
1-25-95	V	CLM
2-4-95	V	CLM
2-13-95	V	CLM
2-21-95	L	CLM
2-27-95	V	CLM
3-5-95	V	C

1995

¹³
1995

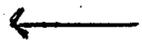
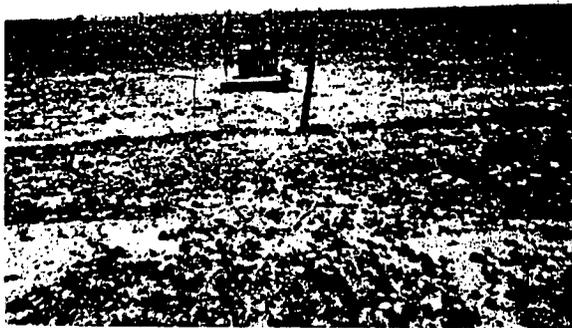
DATE	WET	DEC	INITIALS
3-10-95	V		CLM
3-14-95	V		CLM
3-31-95	L		QCH
4-7-95	V		CLM
4-15-95	V		CLM
4-23-95	L		CLM
4-30-95	V		QCH
5-7-95	V		CLM
5-13-95	V		CLM
5-20-95	L		CLM
5-27-95	V		CLM
6-7-95	V		CLM
6-13-95	V		CLM
6-22-95	V		CLM
6-30-95	L		CLM

1995

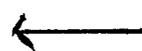
DATE	WET	DEC	INITIALS
7-9-95	L		CLM
7-15-95	V		CLM
7-22-95	V		CLM
8-2-95	V		CLM
8-10-95	V		CLM
8-22-95	V		CLM
8-29-95	V		CLM
9-6-95	V		CLM
9-13-95	V		CLM
9-20-95	V		CLM
9-27-95	V		CLM
10-5-95	V		CLM
10-12-95	V		CLM
10-20-95	V		CLM

¹⁵
1995

DATE	WET	DEC	INITIALS
Oct-27-95	V		CLM
11-5-95	V		CLM
11-11-95	V		CLM
11-19-95	V		CLM

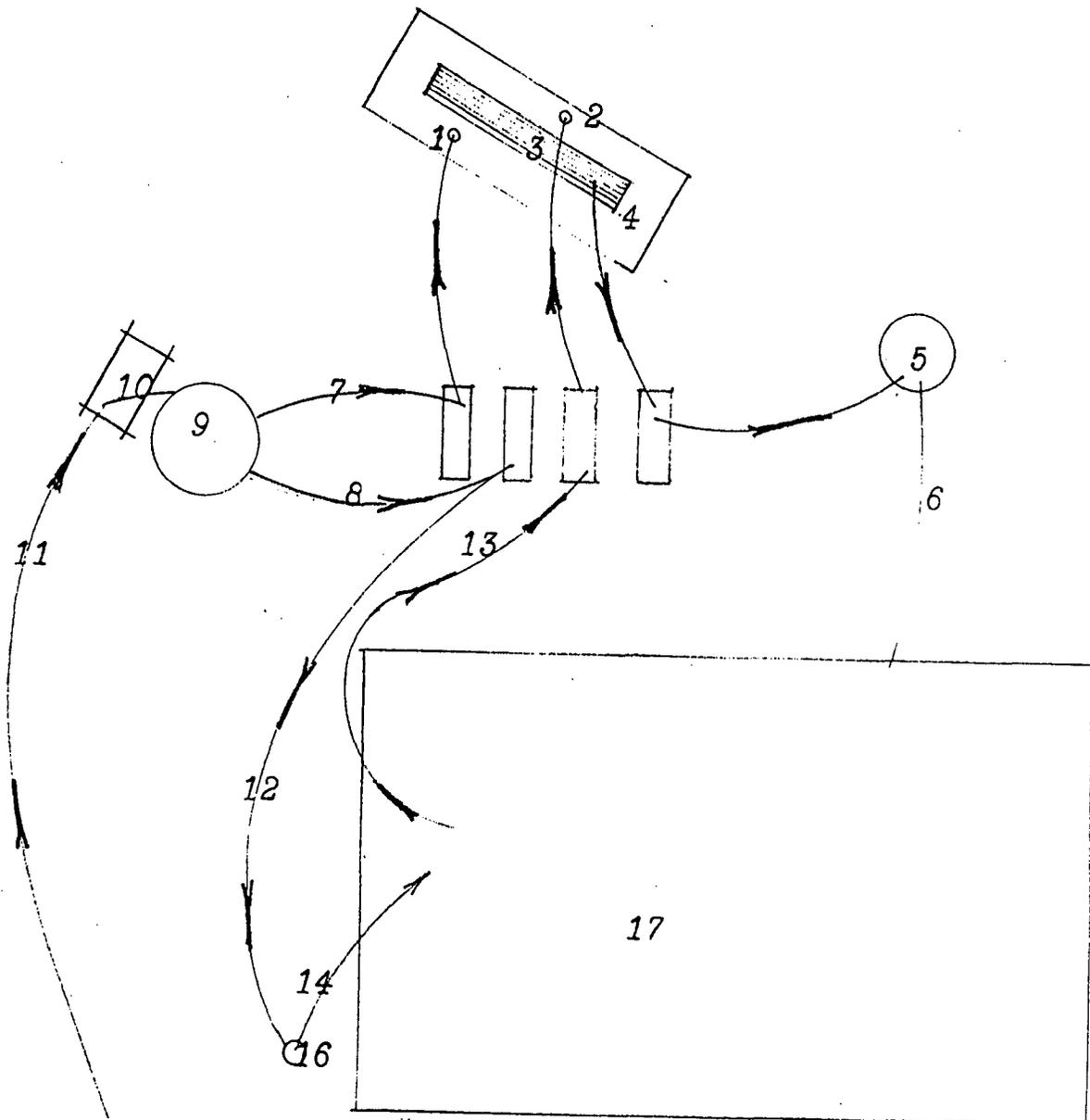


Fresh Water Well



Section Line Fence

PIPING AND WATER FLOW DETAIL



1. 4" Overhead Loading Pipe - Fresh Water
2. 4" Overhead Loading Pipe - Brine Water
3. 85 BBL. Underground Sump Tank
4. Concrete Loading Ramp
5. Elevated 210 BBL. Tank From Sump
6. 2" Outlet From Sump Tank for Disposal Truck
7. 6" Pipe to Fresh Water Loading Pump
8. 4" Pipe to Triplex Pump - Fresh Water
9. 500 BBL. Fresh Water Storage Tank
10. Fresh Water Sand Trap
11. 4" Pipe From Fresh Water Well
12. 2" Pipe From Triplex Pump to Brine Well
13. 6" Pipe From Brine Storage to Loading Pump
14. 2" Pipe Produced Brine to Storage
15. Fresh Water Well
16. Brine Well
17. Lined Open Brine Storage - 11,000 BBL.S



THE REPRODUCTION OF

THE

FOLLOWING

DOCUMENT (S)

CANNOT BE IMPROVED

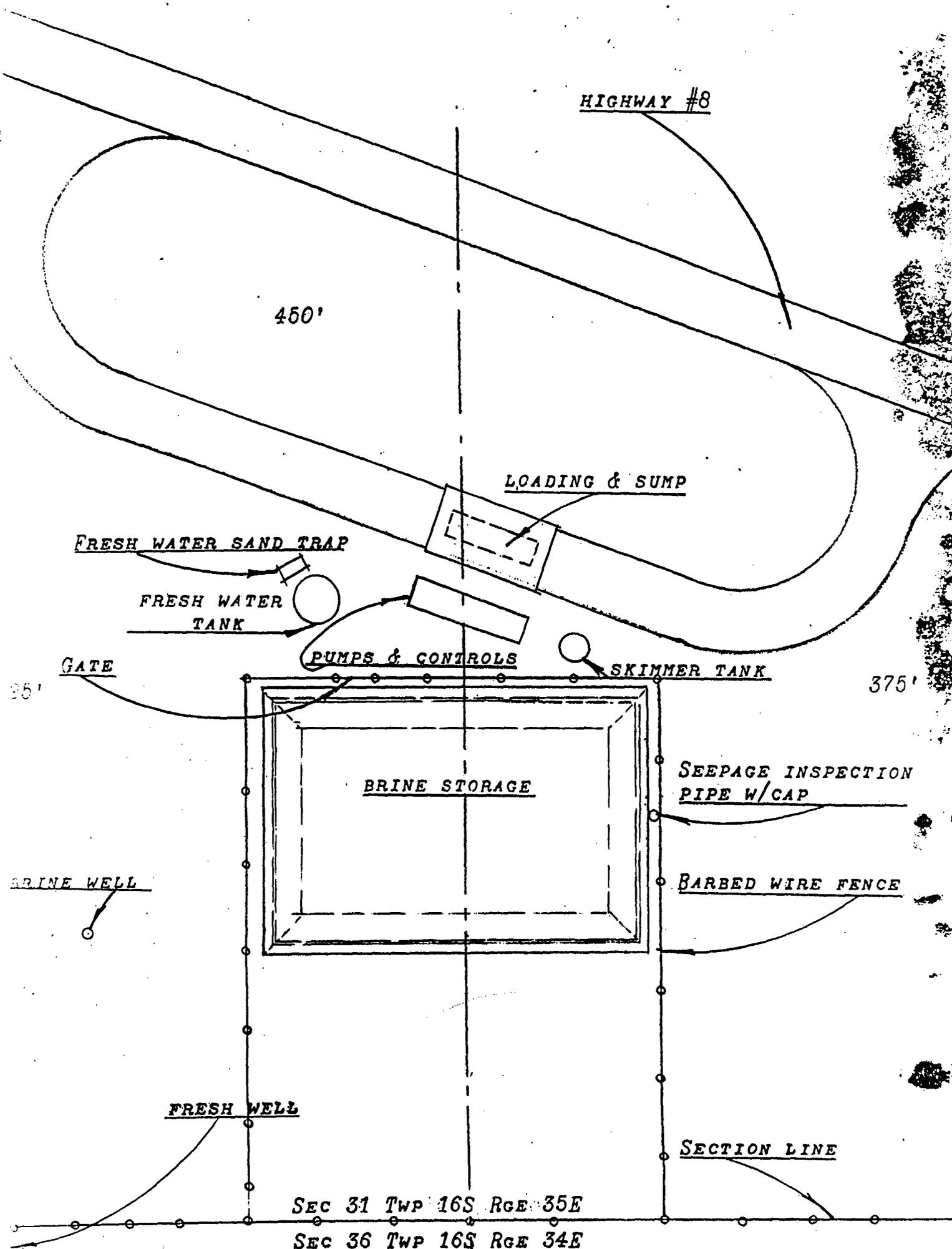
DUE TO

THE CONDITION OF

THE ORIGINAL

NORTH

1" EQUALS 50'

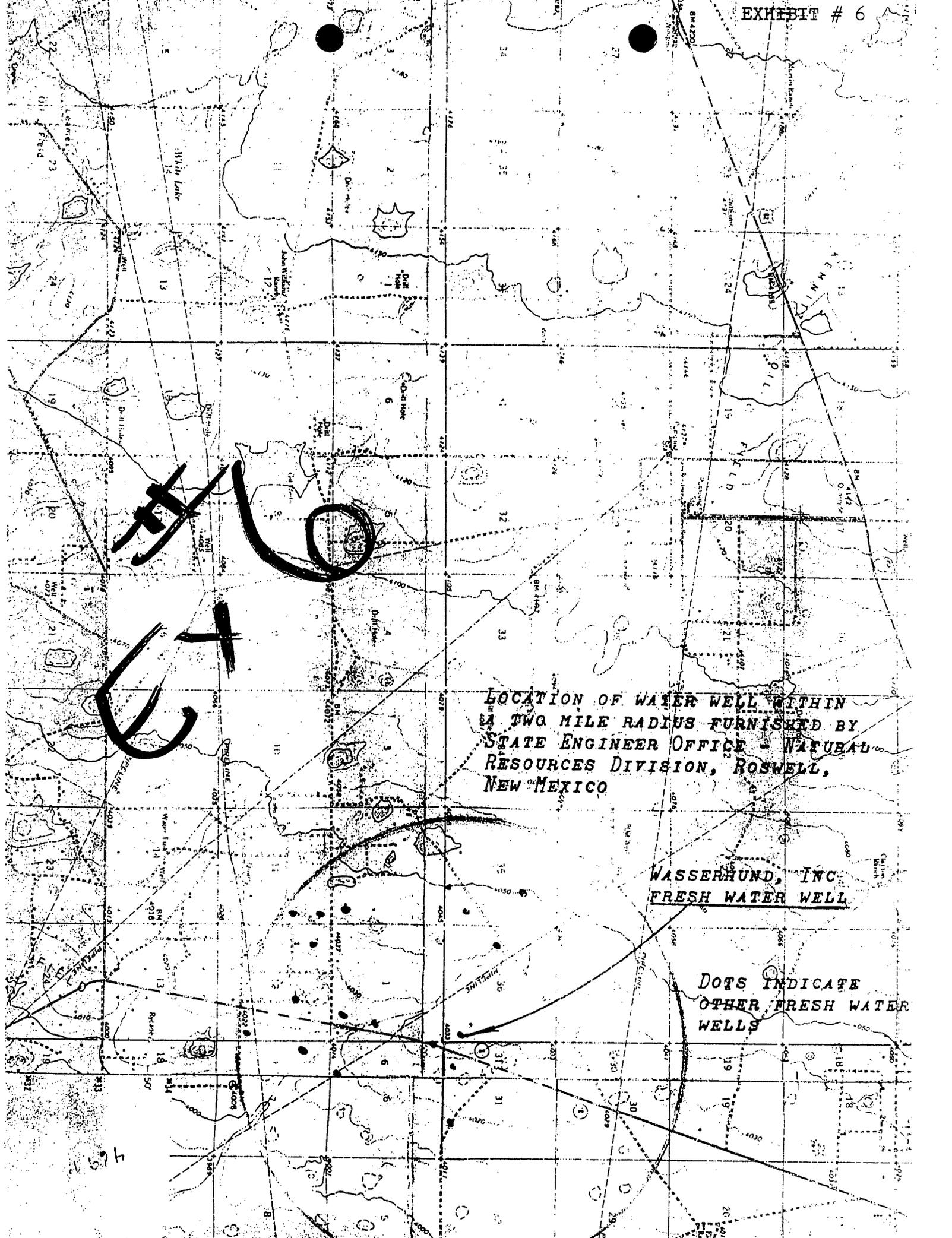


125

LOCATION OF WATER WELL WITHIN
A TWO MILE RADIUS FURNISHED BY
STATE ENGINEER OFFICE - NATURAL
RESOURCES DIVISION, ROSWELL,
NEW MEXICO

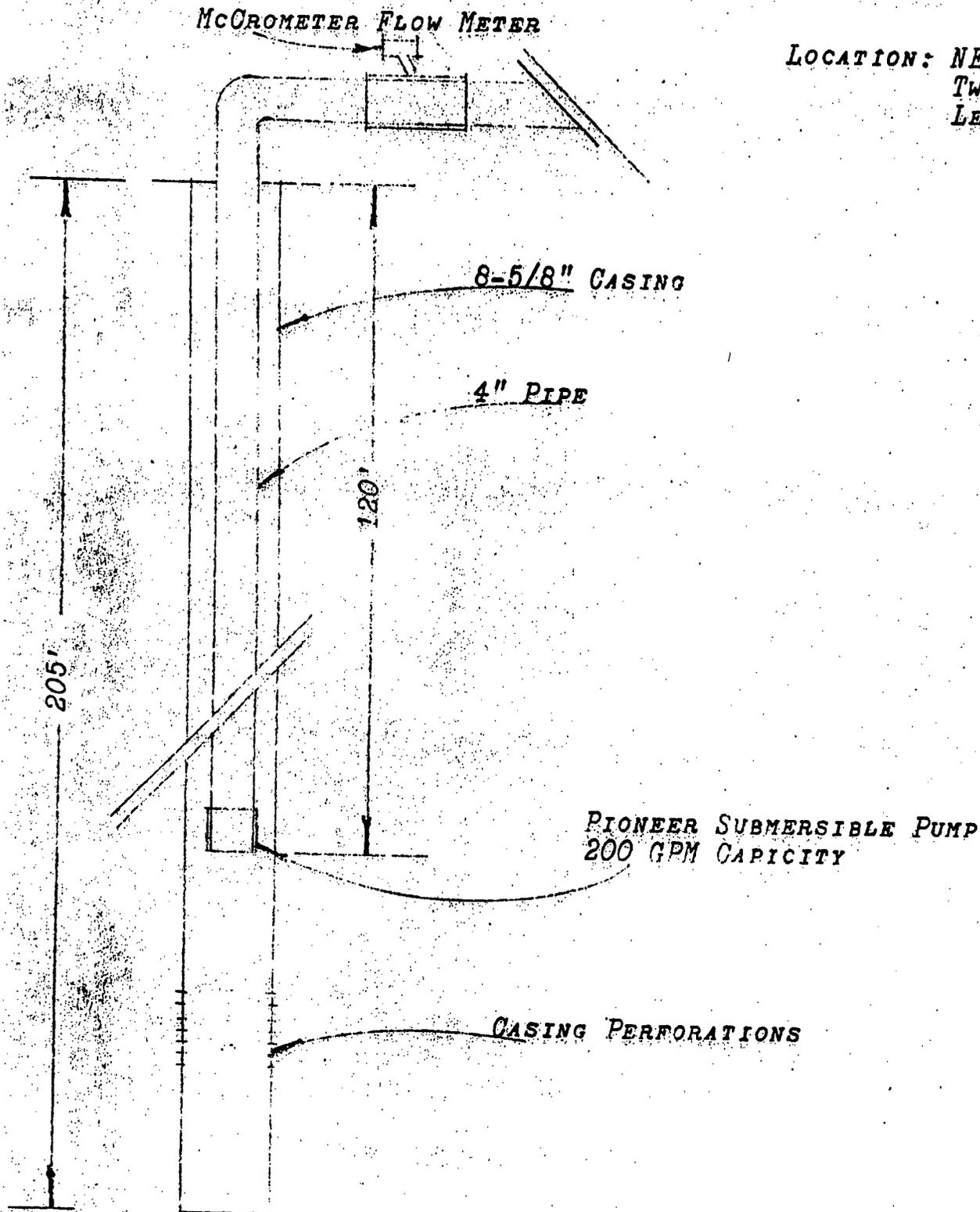
**WASSERHUND, INC.
FRESH WATER WELL**

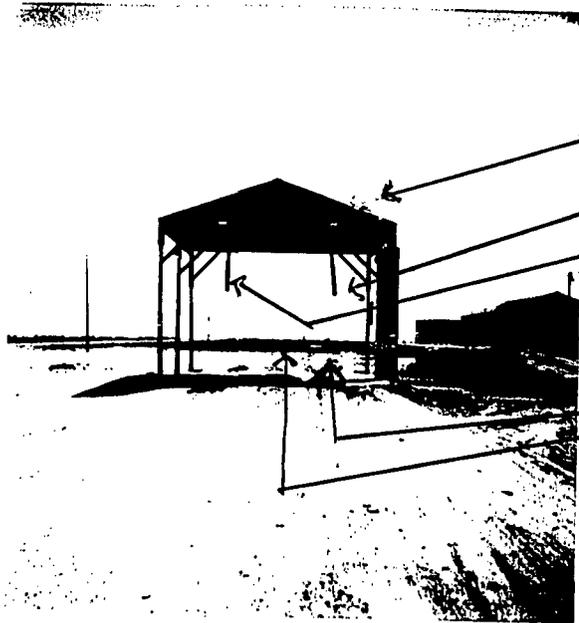
**DOTS INDICATE
OTHER FRESH WATER
WELLS**



FRESH WATER WELL
EIDSON RANCH, INC - PERMITEE
c/o J. E. HASELOFF - AGENT
Box 249
LOVINGTON, NEW MEXICO 88260

LOCATION: NE $\frac{1}{4}$ SE $\frac{1}{4}$ SEC36
TWP 16S RGE 34E
LEA COUNTY





Loading Shed

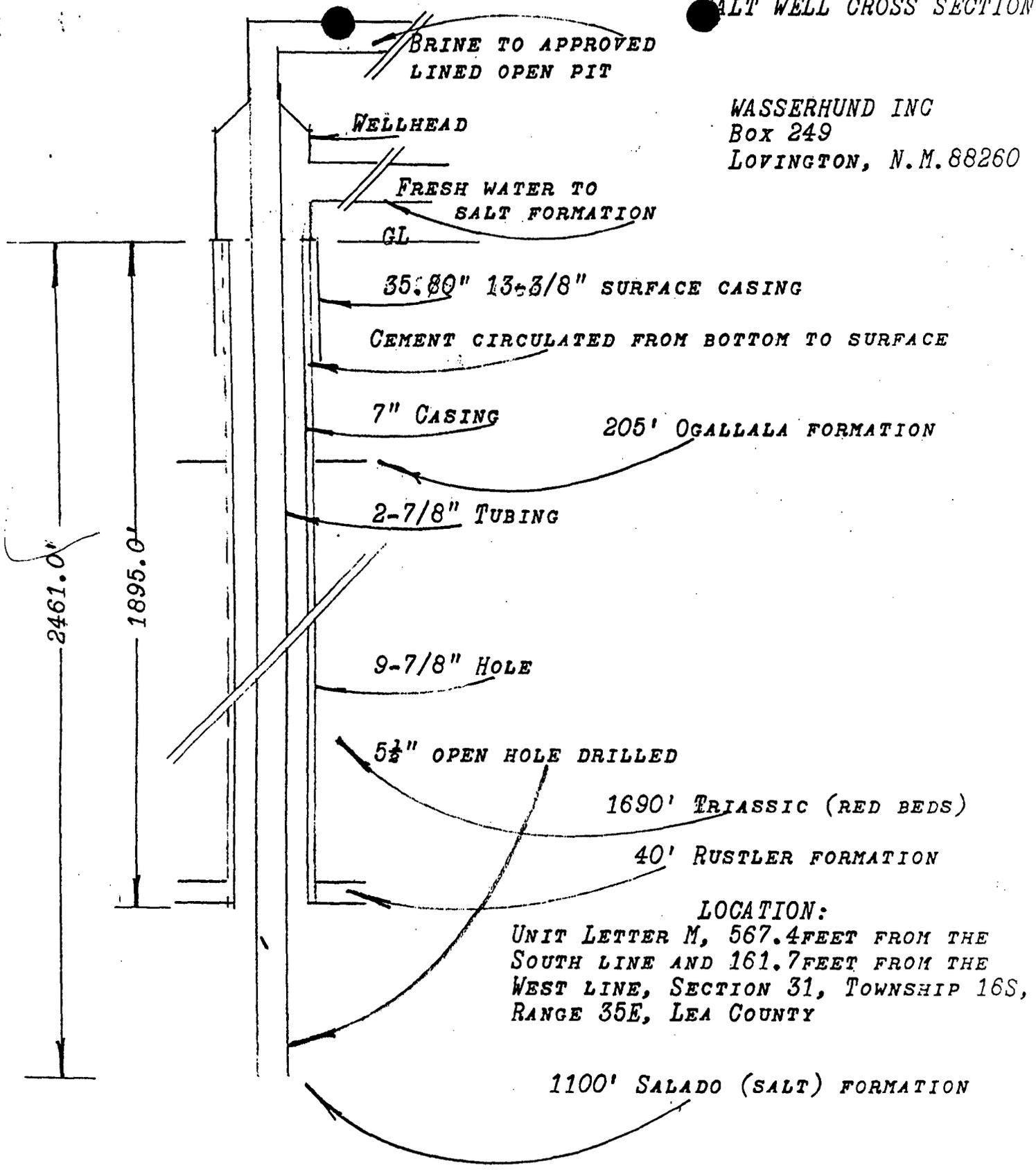
Fresh Water Loading Pipe

Brine Water Loading Pipe

Concrete Loading Ramp

Concrete Sump

EXHIBIT # 9
SALT WELL CROSS SECTION



BRINE TO APPROVED
LINED OPEN PIT

WELLHEAD

FRESH WATER TO
SALT FORMATION
GL

35.80" 13 3/8" SURFACE CASING

CEMENT CIRCULATED FROM BOTTOM TO SURFACE

7" CASING

205' OGALLALA FORMATION

2-7/8" TUBING

9-7/8" HOLE

5 1/2" OPEN HOLE DRILLED

1690' TRIASSIC (RED BEDS)

40' RUSTLER FORMATION

LOCATION:

UNIT LETTER M, 567.4 FEET FROM THE
SOUTH LINE AND 161.7 FEET FROM THE
WEST LINE, SECTION 31, TOWNSHIP 16S,
RANGE 35E, LEA COUNTY

1100' SALADO (SALT) FORMATION

WASSERHUND INC
Box 249
LOVINGTON, N.M. 88260

2461.0'

1895.0'

APPLICATION FOR PERMIT
TO UTILIZE A LINED EVAPORATION PIT

PERMIT NO. LP-H-107
EXHIBIT # 10

New Mexico Oil Conservation Commission

Name of Operator WASSERBERG, INCORPORATED

Address 1613 SOUTH LOPE STREET, LAFAYETTE, NEW MEXICO 88200

Name of lease upon which evaporation pit will be located EDSON STATE #1

Location of evaporation pit: Unit Letter W Section 31 Township 16S Range 35E

Lease(s) which will be producing into pit EDSON STATE #1

Pools which will be producing into pit N/A

Analysis of disposal water: Chlorides N/A ppm. Total dissolved solids N/A ppm.
(If more than one pool will be producing into pit, give water analysis for each pool.)

Quantity of water to be disposed of into this pit N/A barrels per day.

Water production from these same wells 12 months ago N/A bpd. Three months ago N/A bpd.
(If more than one pool will be producing into pit, give water production data for each)

Method of hydrocarbon entrapment to be employed: Settling tank N/A Header pit N/A

If settling tank is to be used, give size and number of barrels N/A

If header pit is to be used, give dimensions and depth N/A

Type of lining material N/A Thickness N/A

Dimensions of Evaporation Pit ("A" and "B" on diagram) PLANS SUBMITTED

Number of square feet contained in above 9750

Depth (Top of lease to floor of pit--"D" on diagram) PLANS SUBMITTED

Material to be used as liner DURONT 125 Thickness 30Y

Does manufacturer recommend protection of material from direct sunlight? Yes No

If no, what means will be provided to so protect the material? _____

Is material resistant to hydrocarbons? Yes No

Is material resistant to acids and alkalis? Yes No

Is material resistant to salts? Yes No

Is material resistant to fungus? Yes No

Is material not-resistant? Yes No

What joints in material be fabricated in the field? Yes No

If no, describe method to be used in lining material _____

Attach manufacturer's brochure describing the qualities of the lining material.

Describe the leakage detection system to be used PLANS SUBMITTED

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and further, that the subject evaporation pit and appurtenances, when installed, will be kept in good repair, and that all due diligence will be exercised in keeping the surface of the water free of oil and other debris.

Name J. Wasserberg Title PRESIDENT Date 18 JUN 80

Approved by _____ Title _____ Date JUN 20 1980

Orig. Signed By
Jerry Sutton
Dist. L. Supv.

PROOF OF COMPLETION OF WELL

Permit No. 1-222

1. Name of Water Right Owner FIDSON RANCH INC.
Mailing address C/O J. E. HASELOFF - 1613 SOUTH LOVE STREET
City and State LOVINGTON, NEW MEXICO 88260

2. Permit is for _____ from _____ ground water.
(supplemental well, change location of well) (artesian or shallow)

3. Description of well:
Located in the NE 1/4 SE 1/4 SE 1/4 of Sec. 36 Twp. 16S Rge. 34E N.M.P.M., or Tract No. _____
of Map No. _____ of the _____ District; total depth 205 feet; is well cased yes;
outside diameter of top casing (or hole, if uncased) 8 5/8 inches; if artesian, is well equipped with gate
valve _____; date drilled 6-20 to 7-9 1980; Name of driller Glenn's Water Well Service

4. Record of Pumping Test, if made (to be supplied by person or firm making test); Name and address of
person making test, W-H-B, INC. - LOVINGTON, NEW MEXICO
date of test 7-23 & 7-24 1980; depth to water before test, 85 feet BELOW land surface,
(above, below)
and pumping level during test, 120 feet; length of test, 24 hours; average discharge, 200 G.P.M.;
specific capacity of well, 6.25 gals./min. per foot of drawdown.

5. Permanent Pump Equipment:
(a) Description of pump: Make PIONEER; Type SUBMERSIBLE
size of discharge 4 inches; if turbine type, give size of column, _____ inches; diameter of
bowls _____ inches; number of bowls _____; length of suction pipe _____ feet; total length of
column, bowls and suction pipe _____ feet; if centrifugal type, give size of pump _____ inches;
if other type describe _____
rated capacity of pump (if known), 200 G.P.M., at 3450 rev. per min., from a depth of 120 feet.

(b) Description of power plant: Make ELECTRIC MOTOR; Type SUBMERSIBLE
rated horsepower (if available) 15; type of drive connection to pump DIRECT
(direct, gearhead, or belt)

(c) Actual discharge of pump, 200 G.P.M., at 3450 rev. per min., from a depth of 120 feet;
Date of test 7-23 & 7-24 1980.

6. If reservoir is used, give approximate size: length _____ feet; width _____; depth _____

7. If above well replaced an old well to be plugged or abandoned, fill out the following: the well abandoned
is located in the _____ 1/4 _____ 1/4 _____ 1/4 of Sec. _____, Twp. _____, Rge. _____.

Describe plugging method _____
Name of plugging contractor _____

8. Well Record filed with State Engineer's Office SEE DRILLERS REPORT Yes
(Yes or No)

STATE ENGINEER OFFICE
ROSWELL, N.M.
SEP 18 AM 8 25

J.E. HASELOFF, affirm that the foregoing statements are true to the best of my knowledge
and belief and that I am the AGENT FOR owner and holder of said water right.
(sole, partial, agent for, etc.,)

FIDSON RANCH, INC., Permittee
J. E. Haseloff

STATEMENT OF STATE ENGINEER'S REPRESENTATIVE

I hereby certify that I have inspected the above well and find it constructed in accordance with the conditions
of the permit. Note any exceptions None

Well was producing _____ gpm against a _____ head of _____ feet at _____ rpm.
(measured) (estimated)

N/A

Old well has been _____
(plugged) (capped) (retained for other rights)

By: Rob Bessey
Title: Los Alamos County Basin Supervisor
Date: October 9, 1980

NO. OF COPIES RECEIVED		
DISTRIBUTION		
SANTA FE		
FILE		
U.S.O.F.		
LAND OFFICE		
OPERATOR		

5a. Indicate Type of Lease
State Fee
5. State Oil & Gas Lease No.

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. OIL WELL GAS WELL OTHER - BRINE

2. Name of Operator
WASSERHUND, INC

3. Address of Operator
1613 SOUTH LOVE STREET, LOVINGTON, N.M. 88260

4. Location of Well
UNIT LETTER M 567.4 FEET FROM THE SOUTH LINE AND 161.7 FEET FROM THE WEST LINE, SECTION 31 TOWNSHIP 16 S RANGE 35 E NMPM.

7. Unit Agreement Name

8. Farm or Lease Name
EIDSON STATE

9. Well No.
1

10. Field and Pool, or Wildcat

15. Elevation (Show whether DF, RT, GR, etc.)

12. County
LEA

16. Check Appropriate Box To Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input checked="" type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	OTHER <input type="checkbox"/>	CASING TEST AND CEMENT JOB <input checked="" type="checkbox"/>	
		OTHER <u>DRILLED FOR SALT</u>	

17. 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.

9-7/8" HOLE

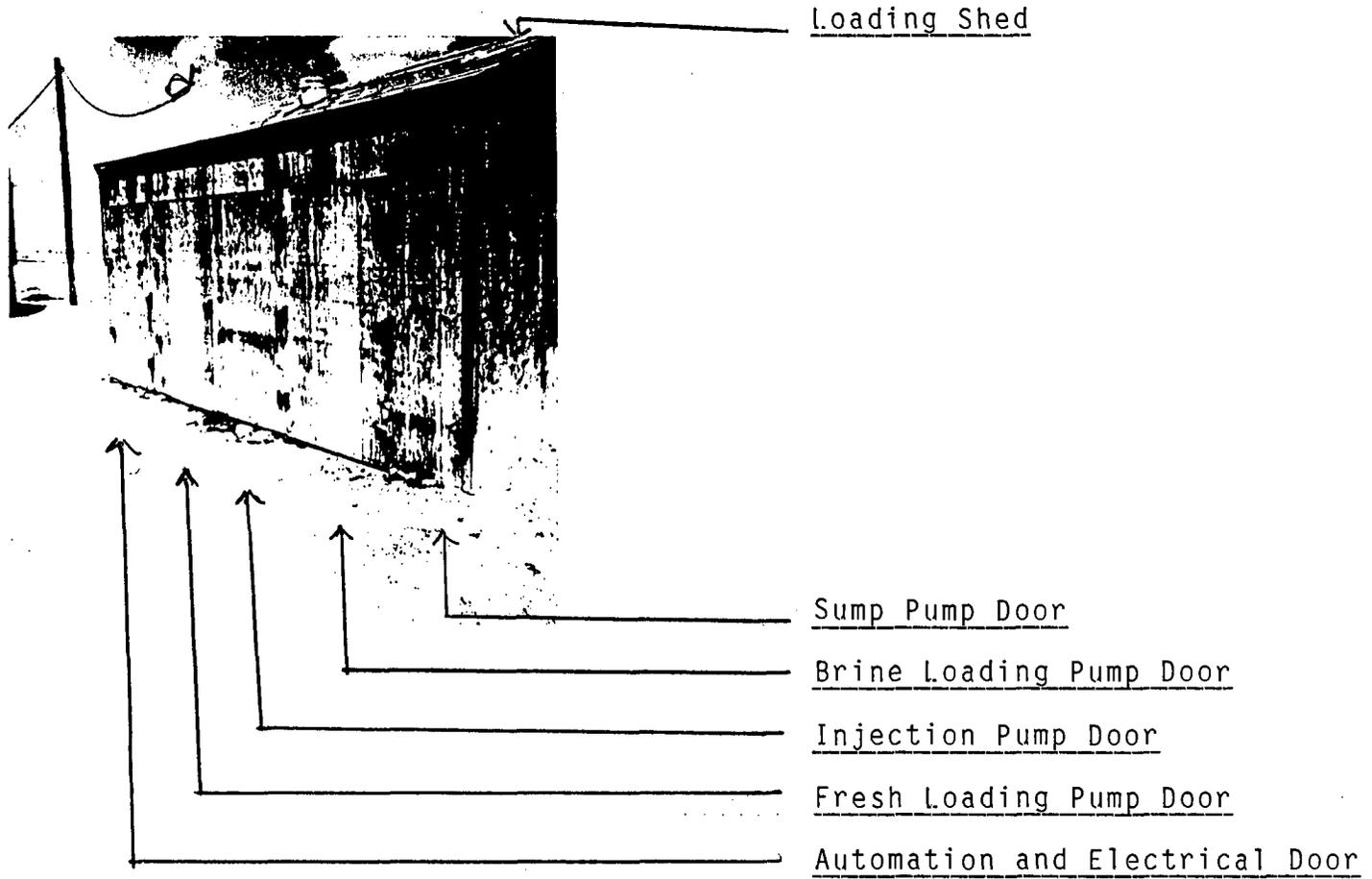
COMMENCED ROTARY DRILLING 21AUG80 - COMPLETED ROTARY DRILLING 23AUG80
SET 35.80' 13-3/8" SURFACE CASING - RAN 50 JTS 7" 32# & 35# USED
TESTED CASING SET AT 1895.0' - CEMENTED WITH 265 SKS CLASS "C"
CEMENT, 570 SKS HALLIBURTON LIGHT CEMENT CONTAINING 4560# SALT MIXED
8# W/570, 142# FLOCELE MIXED 2# W/570, AND 5SKS CaCl MIXED 2% W/265 -
PLUGGED DOWN AT 5:30 PM 23AUG80 - CIRCULATED ABOVE CEMENT FROM TOTAL
DEPTH TO SURFACE - LET CEMENT SET 48 HRS - REQUIRED REVERSE UNIT TO
DRILL OPEN HOLE INTO SALT FORMATION TO A TD OF 2555' - RAN 84 JTS
2-7/8" 7.9# C-75 DSSHT TESTED USED TUBING TO 2461.0' - COMMENCED
PUMPING FRESH WATER DOWN 7" CASING AND RETURNING 9.8# PER GALLON
BRINE THROUGH 2-7/8" TUBING - BRINE BEING PUMPED INTO APPROVED
LINED OPEN PIT

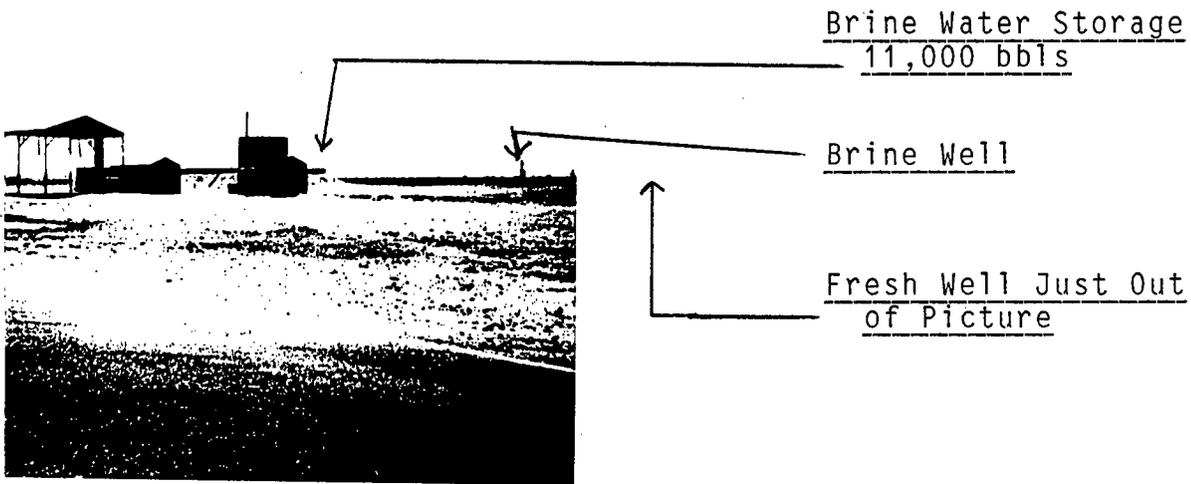
18. I hereby certify that the information above is true and complete to the best of my knowledge and belief.

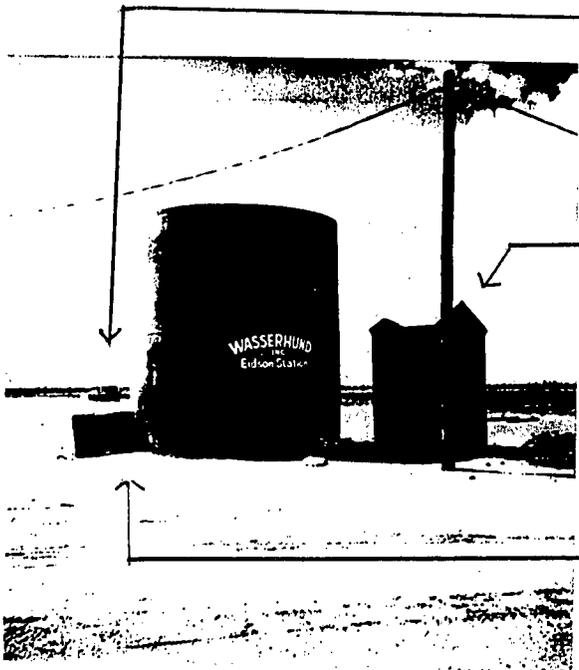
SIGNED WASSERHUND, INC
[Signature] TITLE PRESIDENT DATE 17SEP80

APPROVED BY _____ TITLE _____ DATE _____

CONDITIONS OF APPROVAL: _____







Brine Well

Fresh Water Storage Tank

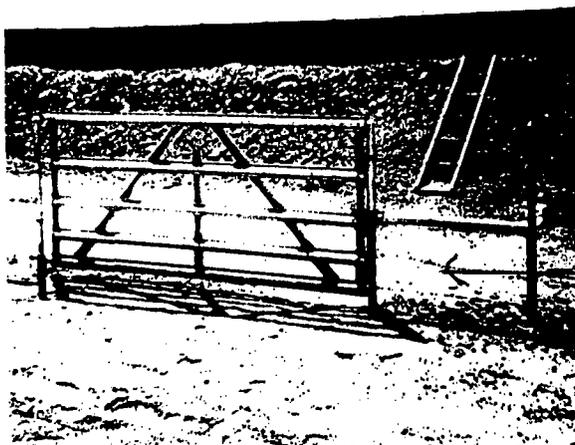
Fresh Water Sand Trap
Inside this Building

Freeze Boxes Contain
Automation and Low-High
Switches

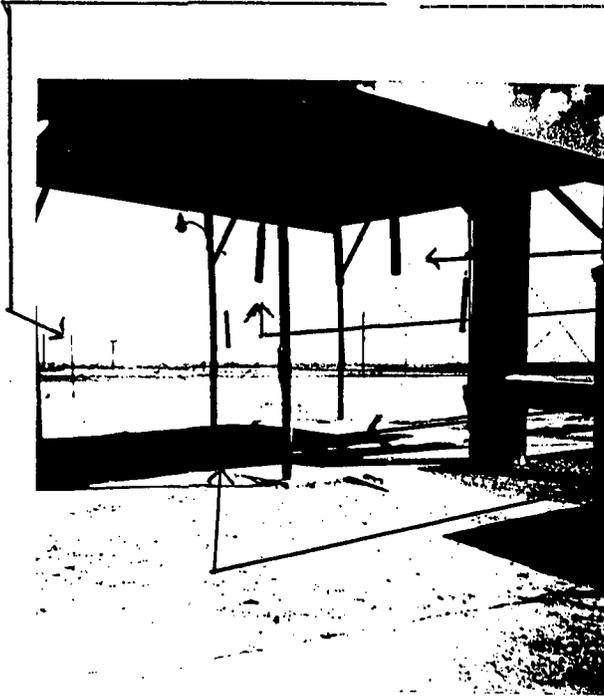


Key System W/Automatic
Counters for Both Brine
and Fresh Water

Brine Water Samples May
Be Obtained Through This
Gate and up Those Steps



New Mexico State Highway # 238 (Prior # 8)



Fresh Water Loading Pipe

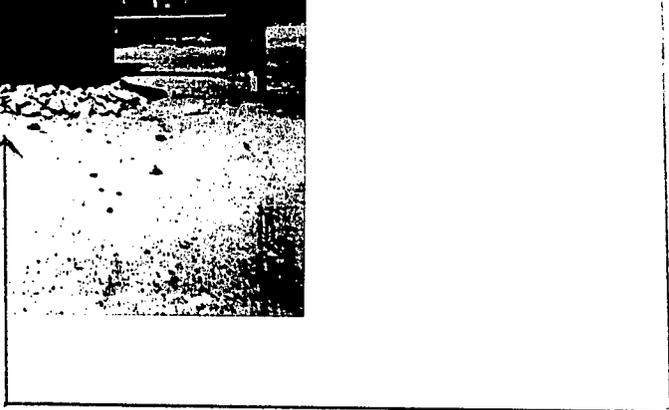
Brine Water Loading Pipe

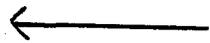
Concrete Loading Ramp

Concrete Sump



Elevated 210 Barrel Holding
Tank From Sump Tank

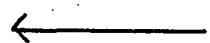




Brine Storage Liner



Produced Brine Water From
Salt Section



Brine Loading Pump Suction



Brine Storage

Earth Dike

Barbed Wire Fence

Monitor well Inspection
Pipe

The Santa Fe New Mexican

Since 1849. We Read You.

96 JAN 27 AM 8 52

NEW MEXICO OIL CONSERVATION DIVISION
ATTN: SALLY MARTINEZ
P.O. BOX 6429
SANTA FE, N.M. 87505-6429

AD NUMBER: 458214

ACCOUNT: 56689

LEGAL NO: 58906

P.O. #: 96199002997

164	LINES	once	at	\$ 65.60
Affidavits:				5.25
Tax:				4.43
Total:				\$ 75.28

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
Energy, Minerals and
Natural Resources
Department
Oil Conservation Division

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(BW-004) - Wasserhund Inc., J.E. Hasseloff, President, P.O. Box 249, Lovington, New Mexico, 88260 has submitted an application for renewal of its previously approved discharge plan for its brine well facility. The brine extraction facility is located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,000 feet and brine is extracted with an average total dissolved solids concentration of 313,000 mg/l. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of approximately 325 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th of January, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Legal #58906
Pub. January 16, 1996

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 58906 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 16th day of JANUARY 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
16th day of JANUARY A.D., 1996.



OFFICIAL SEAL

LAURA E. HARDING

NOTARY PUBLIC -- STATE OF NEW MEXICO

MY COMMISSION EXPIRES

11/23/99

Laura E. Harding

Affidavit of Publication

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

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

That the notice which is hereto attached, entitled **Notice Of Publication**

~~XXXXXXXXXXXX~~ Court of Lea

~~XXXXXXXXXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXXXXXXXXXX~~ for **one (1) day**

~~XXXXXXXXXXXX~~ consecutive weeks, beginning with the issue of **January 17**, 19**96**

and ending with the issue of **January 17**, 19**96**

And that the cost of publishing said notice is the sum of \$ **43.20**

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

Joyce Clemens

Subscribed and sworn to before me this **17th**

day of **January**, 19**96**

John Sevier
Notary Public, Lea County, New Mexico

My Commission Expires **Sept. 28**, 19**98**

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(BW-904) - **Wasserhund Inc., J.E. Haaseloff, President, P.O. Box 249, Lovington, New Mexico, 88260** has submitted an application for renewal of its previously approved discharge plan for its brine well facility. The brine extraction facility is located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,000 feet and brine is extracted with an average total dissolved solids concentration of 313,000 mg/l. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of approximately 325 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January 1996.

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

SEAL

Published in the Lovington Daily Leader January 17, 1996.

OIL CONSERVATION DIVISION
RECEIVED

'96 JAN 14 AM 8 52

RECEIVED

JAN 12 1996

1122
USFWS - NMESSE

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(BW-004) - Wasserhund Inc., J.E. Hasseloff, President, P.O. Box 249, Lovington, New Mexico, 88260 has submitted an application for renewal of its previously approved discharge plan for its brine well facility. The brine extraction facility is located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,000 feet and brine is extracted with an average total dissolved solids concentration of 313,000 mg/l. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of approximately 325 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January 1996.

NO EFFECT FINDING

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date January 17, 1995

SEAL Consultation # GW960CD-1

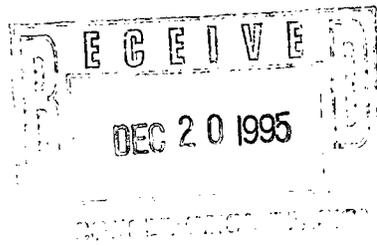
Approved by R. Mark Wilson (Acting)

**U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO**

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

December 18, 1995



Mr. Mark Ashley
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

SUBJECT: Wasserhund Inc. BW-004

Dear Mark:

Find enclosed application for discharge plan renewal for Wasserhund Inc., BW-004 Brine facility. Also enclosed is check for filing fee.

If additional information is needed or you have any questions, please call.

Have a Happy Holiday.

Sinncerely,

A handwritten signature in cursive script that reads "Eddie W. Seay".

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

**ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH**

I hereby acknowledge receipt of check No. [REDACTED] dated 12/15/95
 or cash received on 12/20/95 in the amount of \$ 50.00
 from Wasserhund Inc
 for Brine well BW-004

Submitted by: _____ Date: _____
 Submitted to ASD by: Z. Clenden Date: 1/16/96
 Received in ASD by: Angela Horroca Date: 1-17-96

Filing Fee New Facility _____ Renewal _____
 Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.
 Full Payment _____ or Annual Increment _____

WASSERHUND INC.
 P. O. BOX 249 396-3128
 LOVINGTON, NM 88260

95-108/1122
6

12-15-95 19

PAY TO THE ORDER OF NMED-Water Quality Management \$ 50.00
Fifty and No/100-----
 DOLLARS

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNTS.

filing fee			
Discharge Plan	BW-004		

[Handwritten Signature]

[REDACTED]

Western Commerce Bank
 Lovington, NM
 GUARDIAN SAFETY
 ©CLARKE AMERICAN FX



January 11, 1996

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Der Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

- 1. Publisher's affidavit in duplicate.**
- 2. Statement of cost (also in duplicate.)**
- 3. CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than January 18, 1996.

Sincerely,

Sally E. Martinez
Administrative Secretary

Attachment

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

January 11, 1996

NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997

ATTN: BETSY PERNER

Dear Sir/Madam:

Please publish the attached notice one time. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

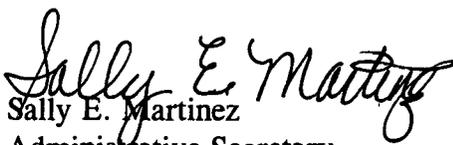
Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit.
2. Invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on January 16, 1996.

Sincerely,


Sally E. Martinez
Administrative Secretary

Attachment

NOTICE OF PUBLICATION

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

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(BW-004) - Wasserhund Inc., J.E. Hasseloff, President, P.O. Box 249, Lovington, New Mexico, 88260 has submitted an application for renewal of its previously approved discharge plan for its brine well facility. The brine extraction facility is located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,000 feet and brine is extracted with an average total dissolved solids concentration of 313,000 mg/l. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of approximately 325 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

NOTICE OF PUBLICATION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

OIL CONSERVATION DIVISION

December 8, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-907

Mr. J. E. Haseloff
Wasserhund Incorporated
10135 Love Street
Lovington, New Mexico 88260

RE: Discharge Plan BW-004 Renewal
Wasserhund Incorporated
Eidson Brine Station
Lea County, New Mexico

Dear Mr. Haseloff:

On June 11, 1996, the groundwater discharge plan, BW-004, for the Wasserhund Incorporated Eidson Brine Station located in SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico, **will expire**. The plan was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. **If Wasserhund Incorporated submits an application for renewal at least 120 days before the discharge plan expires (on or before February 11, 1996), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

The discharge plan renewal application for the **Eidson Brine Station** is subject to the WQCC Regulations 3114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690 for Brine Extraction Facilities.

Mr. J.E. Haseloff
December 8, 1995
Page 2

The \$50 dollar filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan - with the first payment due the at the time of approval. Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD nowhere District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.**

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office

Z 765 962 907



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

OIL CONSERVATION DIVISION

July 20, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-744

Mr. J. E. Haseloff
Wasserhund Incorporated
10135 Love Street
Lovington, New Mexico 88260

**RE: Discharge Plan BW-004 Renewal
Wasserhund Incorporated
Eidson Brine Station
Lea County, New Mexico**

Dear Mr. Haseloff:

On December 18, 1982, the groundwater discharge plan, BW-004 (formerly GWB-1 and DP-321) for the Eidson Brine Station located in the SW/4 SW/4 of Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years, and was subsequently renewed on June 11, 1991 by the Director of the OCD. The current approval will expire on June 11, 1996 and you should submit an application for renewal six months before this date.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in you system, and if so, please include these modifications in your application for renewal.

Mr. J.E. Haseloff
July 20, 1995
Page 2

To assist you in preparation of your application, I have enclosed an application form and a copy of the OCD's Guidelines for the Preparation of Discharge Plans at Brine Extraction Facilities and a copy of the WQCC regulations. Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request.

The discharge plan renewal application for the Eidson Brine Station is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six hundred and ninety (690) dollars for brine extraction facilities.

The fifty (50) dollar filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

If you no longer have any actual or potential discharges a discharge plan is not need, please notify this office. If you have any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,


Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office

Z 765 962 744



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

STATE OF NEW MEXICO
NMOCD District I

INTER-OFFICE MEMO

To file: Wasserhund, Inc-Eidson St. DP# BW-04

Date: August 23, 1994

Time: 9:30 am

Telephone call: ___ Meeting: ___ Other: X On site visit

Person called or attending:

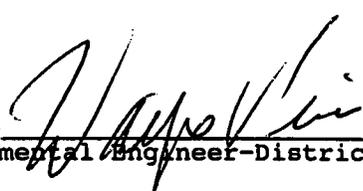
REFERENCE: Wasserhaund Brine St.
Hyw 8, 4 mi nw of Buckeye NM
31-16-35

Subject: Site Inspection

Comments:

Brine Station looks good, no apparent leaks. Tanks not leaking, Brine pond liner looked good. Could not inspect brine pump or well locked up in building.

Did not see sign marking well head with legals on it.

Wayne Price 
NMOCD Environmental Engineer-District I

cc: CRIS EUSTICE

OIL CONSERVATION DIVISION
RECEIVED

'93 JUN 1 AM 9 44

May 26, 1993

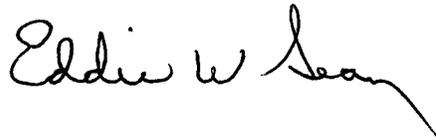
Ms. Kathy Brown
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Dear Kathy:

Please find enclosed information, as we discussed, on
Wasserhund, Inc. Brine Well, Lea Co., NM.

If I can be of further assistance or you need additional
information, please call.

Sincerely,



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

1991

DATE	NETDR	INITIALS
July 17	V	CLM
July 21	L	JCH
July 31	V	CLM
Aug 5	V	CLM
Aug 14	V	CLM
AUG 20	V	JCH
Aug 27	V	CLM
Sept 4	V	CLM
Sept 10	V	CLM
Sept 19	V	CLM
Sept 24	V	CLM
Oct 3	V	CLM
Oct 11	V	CLM
Oct 16	V	CLM
Oct 20	V	CLM
Oct 30	V	CLM

1991

DATE	NETDR	INITIALS
APR 12	V	CLM
APR 9	V	JCH
APR 16	V	CLM
APR 25	V	CLM
MAY 2	V	CLM
MAY 10	V	CLM
MAY 16	V	CLM
MAY 23	V	CLM
MAY 29	V	CLM
June 5	V	CLM
June 13	V	CLM
June 22	V	CLM
June 26	V	CLM
July 3	V	CLM
July 9	V	CLM

1992

DATE	NETDR	INITIALS
Jan 6	V	CLM
Jan 12	V	CLM
Feb 20	L	JCH
Feb 27	V	CLM
March 6	V	CLM
March 12	V	CLM
March 18	L	JCH
March 25	V	CLM
Apr 2	V	CLM
Apr 10	V	CLM
Apr 17	V	CLM
Apr 15	V	JCH
Apr 30	V	CLM
May 6	V	CLM
May 12	V	CLM

1991
1992

DATE	NETDR	INITIALS
Nov 6	V	CLM
Nov 13	V	CLM
Nov 21	V	CLM
Nov 27	V	CLM
Dec 5	V	CLM
Dec 10	V	CLM
Dec 19	V	CLM
Dec 27	V	CLM
DEC 30	V	JCH
1992		
Jan 5	V	CLM
Jan 11	V	CLM
Jan 18	V	CLM
Jan 24	V	CLM
Jan 31	V	CLM
Feb 2	L	JCH

1992

DATE	NET DR	INITIALS
Sept 4	V	CLM
Sept 11	V	CLM
Sept 18	V	CLM
Sept 25	V	CLM
Oct 2	V	CLM
Oct 10	V	CLM
Oct 16	V	CLM
Oct 23	L	JCH
Oct 30	V	CLM
Nov 5	V	CLM
Nov 12	V	CLM
Nov 18	V	CLM
Nov 26	V	CLM
Dec 2	V	CLM
Dec 10	V	CLM

1992

DATE	NET DR	INITIALS
May 21	V	CLM
May 29	V	CLM
June 5	V	CLM
June 10	V	CLM
June 19	V	CLM
June 24	V	CLM
July 1	V	CLM
July 9	V	CLM
July 16	L	JCH
July 21	V	CLM
July 30	V	CLM
Aug 6	V	CLM
Aug 14	V	CLM
Aug 21	L	JCH
Aug 27	V	CLM

1993

DATE	NET DR	INITIALS
March 11	V	CLM
March 19	V	CLM
March 25	V	CLM
Apr 2	V	CLM
Apr 8	V	CLM
Apr 16	V	CLM
Apr 22	L	JCH
Apr 29	V	CLM
May 5	V	CLM
May 14	V	CLM
May 20	V	CLM
May 26	V	CLM

1992

1993

DATE	NET DR	INITIALS
Dec 16	V	CLM
Dec 23	V	CLM
Dec 30	V	CLM
1993		
Jan 7	V	CLM
Jan 13	V	CLM
Jan 22	V	CLM
Jan 28	V	CLM
Feb 6	V	CLM
Feb 13	L	JCH
Feb 19	V	CLM
Feb 26	L	CLM
Mar 5	L	CLM
March 8	L	JCH

OIL CONSERVATION DIVISION
RECEIVED

WASSERHUND, INCORPORATED
Post Office Box 249
921 South Love Street
Lovington, New Mexico 88260

'91 JUL 12 AM 8 42

10 July 1991

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
Post Office Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Re: Renewal Discharge
Plan BW-4

Mr. David G. Boyer, Hydrogeologist
Environmental Bureau Chief

Reference Registered Letter Dated March 18, 1991

3. Mechanical Integrity Testing

Wasserhund, Incorporated commits to OCD Guidelines for
~~open~~ hole testing within two (2) years from 6 May 1991. A
pressure test isolating the casing from the formation using either
a bridge plug or packer will be conducted by 6 May 1993.

Sincerely,


J. E. Haseloff
President

JEH/fh

Memo

From

KATHY BROWN
Geologist

To 5-21-91

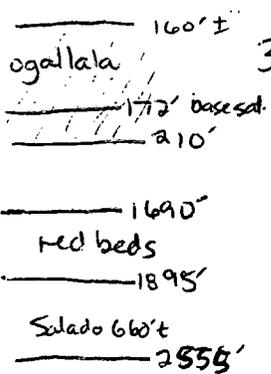
Talked to Pete Haseloff.

Told him need commitment for casing isolated pressure test. His letter of May 6, 1991 committed to open-hole test. He said he was under the right impression of needing to commit to casing-isolated pressure test, but his letter was not worded correctly. Said he would submit a new letter, but would not be back to Hobbs area until several weeks. Told him that was OK, just send it as soon as you can.

KMB

Wasserhund, Inc. (DP-321 exp. 12-18-87)

- 1) Quarterly brine volumes: up-to-date, but have a large discrepancy in numbers (inj vs. prod.), needs to be addressed. Fresh water purchased not injected? Want injected at large disparity
- 2) Well: drilled 8-21-80, TD 2461 13 $\frac{3}{8}$ " @ 36'/7" @ 1895'
Tubing 2 $\frac{7}{8}$ " @ 2461'; max. inj. pressure 390 psi



- 3) Hydrology: 120' DTW in Ogallala (source of injectant).
Confining layer @ 1690' - red beds, GL = 4047'
120' groundwater has TDS 500 mg/l (5.687 EID)

- 4) Bond - Approved 3-14-90 by Director OCD.
\$5000, Bond No. 01-0130-328-80

- 5) Site: In past, noted brine storage pond has problem with the wind pushing brine over walls (inc. freeboard, install windbreak) < 1' freeboard,

6) DPlan

- a) OCB 1-11; Report spills in 24hr. vs 48 committed to
- b) Change EID commitments to OCD commitments
- c) las MIT on file 3-1-88, need new one for renewal
- ? d) buried lines addressed, ages & compo
- ? e) latest chem. analysis 4-87

3-28-88

f) loading pad sump has auto float switch to pump to 180 vert. tank. Earlier gravity fed back to brine storage pond - assure that it's still not

g) hi + low pressure switches on all lines

h) ~~See~~ Storage Pit - monitored w/ seepage inspection pipe, single hypalon liner

++++ drainage system

? i) oil pit next to loading rack ⁽⁶⁻⁸⁶⁾ Still there ?

j) w

7) Roger - Brine (notes 11-29-89)

a) curbing only necessary if spillage evident.

b) fluid in monitor well, sampled 8911291545 Cond 36000 @ 14 1/2

Pump sump dry; monitor it

Call Eddie & have witness pumping & sampling

8) Well File - yes, microfilm

9) 11,000 bbl storage pond for brine; committed to immediately repairing any leaks in response to ETD letter.



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

May 28, 1991

RECEIVED

MAY 28 1991

OIL CONSERVATION DIVISION

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

The U.S. Fish and Wildlife Service (Service) has reviewed the Public Notices dated April 24, 1991, regarding the effects of granting State of New Mexico groundwater discharge permits on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined that there are no wetlands or other environmentally sensitive habitats that will be adversely affected by the following activities.

BW-1: Conoco Incorporated, Midland, Texas.

BW-4: Wasserhund Incorporated, Lovington, New Mexico.

The Service has determined that there may be risks to migratory birds from the proposed permitted activities listed below, and that nets or screens be erected over the tanks to prevent any migratory bird species (waterfowl, shorebirds, songbirds, or raptors) from gaining access to the washdown water and used oil. If a migratory bird should be killed by coming in contact with these fluids, a violation of the Migratory Bird Treaty Act will have occurred.

The proposed permittees are:

GW-61: Williams Field Services, Salt Lake City, Utah, Horse Canyon Compressor Station.

GW-62: Williams Field Services, Salt Lake City, Utah, Manzanares Compressor Station.

GW-63: Williams Field Services, Salt Lake City, Utah, Pump Mesa Compressor Station.

GW-64: Williams Field Services, Salt Lake City, Utah, Middle Mesa Compressor Station.

GW-77: Meridian Oil, Inc., Farmington, New Mexico, Middle Mesa Compressor Station.

If you have any questions, please call Richard Roy at (505) 883-7877.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Fowler-Propst", with a long horizontal flourish extending to the right.

Jennifer Fowler-Propst
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Energy, Minerals and Natural Resources Department,
Forestry and Resources Conservation Division, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife
Enhancement, Albuquerque, New Mexico

OIL CONSERVATION DIVISION
MAY 11 1991 4 45 PM '91

WASSERHUND, INCORPORATED
Post Office Box 249
921 SOUTH LOVE STREET
LOVINGTON, NEW MEXICO 88260

6 MAY 1991

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
Post Office Box 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504

RE: RENEWAL DISCHARGE
PLAN DP-321

MR DAVID G. BOYER, HYDROGEOLOGIST
ENVIRONMENTAL BUREAU CHIEF

REFERENCE REGISTERED LETTER DATED MARCH 18, 1991.

3. MECHANICAL INTEGRITY TESTING

WASSERHUND, INCORPORATED COMMITS TO OCD GUIDELINES
FOR OPEN HOLE TESTING WITHIN TWO (2) YEARS FROM THE
DATE OF THIS LETTER.

Should be casing
isolation pressure test.
Will resubmit new
commitment,
KMB

SINCERELY,



J. E. HASELOFF
PRESIDENT

Affidavit of Publication

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

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

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

That the notice which is hereto attached, entitled
..... Notice Of Publication

and numbered in the
..... Court of Lea
County, New Mexico, was published in a regular and
entire issue of THE LOVINGTON DAILY LEADER and
not in any supplement thereof, once each week on the
same day of the week, for one (1)

consecutive weeks, beginning with the issue of
..... May 1, 1991

and ending with the issue of
..... May 1, 1991

And that the cost of publishing said notice is the
sum of \$48.65

which sum has been (Paid) ~~deposited~~ as Court Costs

Joyce Clemens
.....
Subscribed and sworn to before me this 7th

day of May, 1991

Mrs. Jean Sevier
.....
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1994

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal, modification and amendment applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-68) - Continental Natural Gas, Inc., Terry Spencer, P. O. Box 21470, Tulsa, Oklahoma 74121, has amended the previously advertised discharge plan application for its proposed Eddy County Gas Processing Plant. The amendment changes the location from the NW/4 NE/4, Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico to the NW/4 SE/4 Section 10; Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 460 gallons per day of process wastewater will be collected and stored in above ground steel tanks prior to disposal in an OCD permitted offsite commercial disposal facility. The total dissolved solids concentration of the wastewater will not be known until the plant begins operation. Groundwater most likely to be affected by any spill, leak or other accidental discharge to the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(BW-4) - Wasserhund Incorporated, J. E. Haeseloff, President, P. O. Box 249, Lovington, New Mexico, 88260, has submitted a renewal application for the previously approved discharge plan application for their insitu extraction brine well facility. The brine station is located in the SW/4, SW/4, Section 31, Township 16 South, Range 35 East, NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2000 feet and brine is extracted with an average Total Dissolved Solids content of 300,000 mg/l. Groundwater most likely to be affected by any accidental discharge is at a depth of approximately 120 feet and has a total dissolved solids content of about 500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing. GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 1991. To be published on or before May 1, 1991.

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

SEAL
Published in the Lovington Leader May 1, 1991.

Affidavit of Publication

No. 13521

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly

sworn, says: That he is the Publisher of The

Artesia Daily Press, a daily newspaper of general circulation,

published in English at Artesia, said county and state, and that

the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia

Daily Press, a daily newspaper duly qualified for that purpose

within the meaning of Chapter 167 of the 1937 Session Laws of

the state of New Mexico for 1 consecutive weeks on

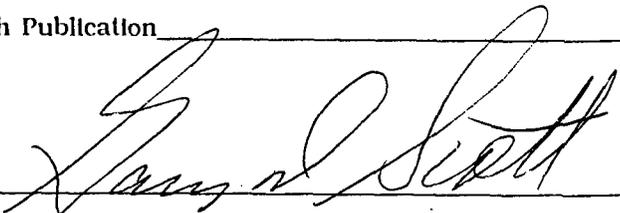
the same day as follows:

First Publication May 1, 1991

Second Publication _____

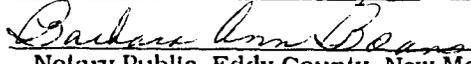
Third Publication _____

Fourth Publication _____



Subscribed and sworn to before me this 6th day

of May 19 91


Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1991

LEGAL NOTICE

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan

Copy of Publication

renewal, modification and amendment applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-69) - Continental Natural Gas, Inc., Terry Spencer, P.O. Box 21470, Tulsa, Oklahoma 74121, has amended the previously advertised discharge plan application for its proposed Eddy County Gas Processing Plant. The amendment changes the location from the NW/4 NE/4, Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico to the NW/4 SE/4 Section 10, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 460 gallons per day of process wastewater will be collected and stored in above ground steel tanks prior to disposal in an OCD permitted offsite commercial disposal facility. The total dissolved solids concentration of the wastewater will not be known until the plant begins operation. Groundwater most likely to be affected by any spill, leak or other accidental discharge to the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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**NOTICE OF PUBLICATION
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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: May 2, 1991

**STATE OF NEW MEXICO
County of Bernalillo**

ss

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for.....1.....times, the first publication being on the.....2.....day of.....May....., 1991, and the subsequent consecutive publications on....., 1991.

Bernadette Ortiz
12-18-90

Thomas J. Smithson
Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this2..... day of.....May....., 1991.

PRICE.....\$ 391.69.....
Statement to come at end of month.

CLA-22-A (R-12/91) ACCOUNT NUMBER.....C 81184.....

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 1991. To be published on or before May 1, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

WASSERHUND, INCORPORATED
Post Office Box 249
921 South Love Street
Lovington, New Mexico 88260

OIL CONSERVATION DIVISION
RECEIVED

'91 APR 10 AM 8 48

7 April 1991

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
Post Office Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Renewal
Discharge Plan
DP-321

Mr. David G. Boyer, Hydrogeologist
Environmental Bureau Chief

As per your registered letter dated March 18, 1991, I submit the following for the renewal of Discharge Plan DP-321.

1. Monitor Well:

- A. Well was swabbed dry and 24 hours later was found dry as operation was witnessed by Eddie Seay, OCD Hobbs Office.
- B. A record log book has been placed in the pump room and your instructions will be adhered to.

2. Brine Storage Pit:

No leaks.

3. Mechanical Integrity Testing

Witnessed chart recording attached. No pressured brine pipe lines exist in Wasserhund's operation.

ST 6 APR 1991

91 APR 10 AM 9 19
RECEIVED
OIL CONSERVATION DIVISION

7 April 1991

4. Maximum Injection Pressure

As per OCD records, Hobbs Office, fracture of the salt section occurs between 850# and 1450#. Wasserhund injects at 220#, and has a Murphy Switch set at 500# for automatic shut off.

5. Transfer of Commitment

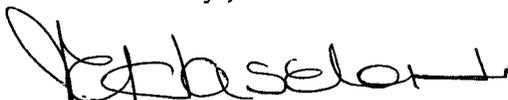
WQCC Rule 5-208 will be adhered to.

6. Closure Plan

Please refer to letter dated September 29, 1988, to New Mexico Health & Environment Department, Items 3 and 4.

This renewal of Discharge Plan DP-321 respectfully submitted.

Sincerely,

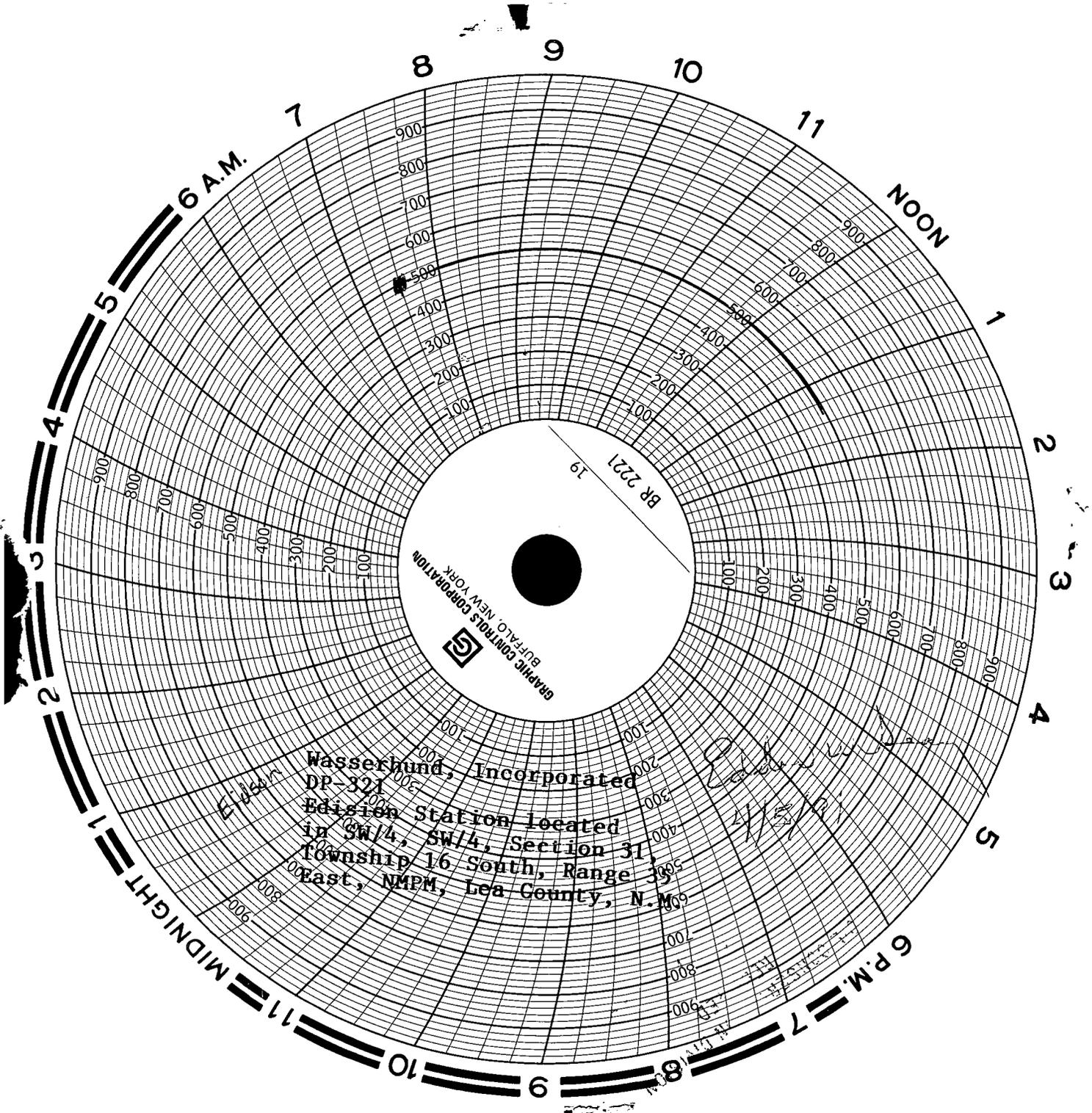


J. E. Haseloff
President

Wasserhund, Incorporated

JEH/fh

Enclosure



6 A.M.

NOON

MIDNIGHT

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BR 2221
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GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK



Wasserhund, Incorporated
DP-321
Edison Station located
in SW/4, SW/4, Section 31
Township 16 South, Range 35
East, NMPM, Lea County, N.M.

Handwritten scribbles and illegible text.

LAB NUMBER 20 #89-347
DATE RECEIVED 12-01-89
DATE REPORTED _____

REPORT TO: Mr. David G. Boyer
NM Oil Conservation Div.
P.O. Box 2088
Santa Fe, NM 87504

User Code: 55430
~~82235~~
Subr Code: 260

Attention: _____

Water () Soil () Sediment () Vegetation () Air Filter ()
1921

Sample Location WASSERHUND BRINE POND Sample # 8911291530

Purpose _____
Date Collected 11/29/89 Time 15:30 Name BOYER
Remarks by Collector _____

Sample Preparation

() Filtered Non Filtered HNO₃ () H₂SO₄ () _____
pH _____ Temp. _____
Conductivity 50000 umho Conductivity at 25°C _____ umho

ANALYSES REQUESTED

	<u>Units</u> +	<u>Counting Error</u>	<u>Date Analysed</u>
<input checked="" type="checkbox"/> Gross Alpha (Rel to U 238)	_____	_____	_____
<input checked="" type="checkbox"/> Gross Alpha (Rel to Am 241)	_____	_____	_____
<input checked="" type="checkbox"/> Gross Beta	_____	_____	_____
() Uranium 238	_____	_____	_____
() Uranium 235	_____	_____	_____
() Uranium 234	_____	_____	_____
() Thorium 232	_____	_____	_____
() Thorium 230	_____	_____	_____
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<input checked="" type="checkbox"/> Radium 226	_____	_____	_____
<input checked="" type="checkbox"/> Radium 228	_____	_____	_____
() Lead 210	_____	_____	_____
() Polonium 210	_____	_____	_____
() Radon 222	_____	_____	_____
() Gamma Spectroscopy	_____	_____	_____
() Other	_____	_____	_____

REMARKS BY ANALYST _____

SCIENTIFIC LABORATORY DIVISION

700 Camino de Salud, NE
 Albuquerque, NM 87106 [505]-841-2500
 RADIOCHEMISTRY SECTION [505]-841-2574

January 3, 1990

ANALYTICAL REPORT
SLD Accession No. RC-89-0347

Distribution

Submitter
 SLD Files

To: Mr. David G. Boyer
 NM Oil Conservation Div.
 P. O. Box 2088
 Santa Fe, NM 87504

From: Radiochemistry Section
 Scientific Laboratory Div.
 700 Camino de Salud, NE
 Albuquerque, NM 87106

Re: A water sample submitted to this laboratory on December 1, 1989

DEMOGRAPHIC DATA

COLLECTION		LOCATION
On: 29-Nov-89	By: Boy . . .	Wasserhund Brine Pond
At: 15:30 hrs.	In/Near:	

ANALYTICAL RESULTS

Analysis	Value	Sigma	D. Lmt.	Units	Analyst
G-Alpha w/ Am-241 ref.	50.00	100.00	250.00	pCi/L	Cress
G-Alpha w/ U -nat ref.	100.00	200.00	400.00	pCi/L	Cress
G-Beta w/ Cs-137 ref.	3500.00	250.00	250.00	pCi/L	Cress
G-Beta w/ Sr/Y90 ref.	3200.00	250.00	250.00	pCi/L	Cress
Ra-226, non-SDWA Mth'd	45.00	3.00	1.00	pCi/L	Cress
Ra-228, non-SDWA Mth'd	53.00	15.00		pCi/L	Bay
U -238, non-SDWA Mth'd	5.00	2.00		pCi/L	Lusk
U -234, non-SDWA Mth'd	4.00	2.00		pCi/L	Lusk
Th-230, non-SDWA Mth'd	0.60	2.00		pCi/L	Lusk

Notations & Comments:

Uncertainties, sigmas, are expressed as +/- one standard deviation, i.e. one standard error.

Small negative or positive values which are less than two(2) standard deviations should be interpreted as: including 'zero'; as 'not detected'; as 'less than the detection limit (<D. Lmt.)' when reported; or 'less than twice the standard deviation'.

Reviewed By:

Loren A. Berge

Loren A. Berge, Ph.D. 01/03/90
 Supervisor, Radiochemistry Section

90 JAN 5 AM 10 54
 RECEIVED
 OIL CONSERVATION DIVISION



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

859
WNN

**GENERAL WATER CHEMISTRY
and NITROGEN ANALYSIS**

DATE RECEIVED <u>12/01/89</u>	LAB NO. <u>NO 3923</u>	USER CODE <input type="checkbox"/> 59300 <input type="checkbox"/> 59600 <input checked="" type="checkbox"/> OTHER: 82235
Collection DATE <u>89/11/29</u>	SITE INFORMATION	Sample location <u>WASSERHUND - ANDERSON STATION</u>
Collection TIME <u>1530</u>		Collection site description <u>BRINE POND</u>
Collected by - Person/Agency <u>ANDERSON/BOYER 10CD</u>		

SEND FINAL REPORT TO

ENVIRONMENTAL BUREAU
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg, PO Box 2088
 Santa Fe, NM 87504-2088

Attn: David Boyer

Phone: 827-5812

SAMPLING CONDITIONS

<input type="checkbox"/> Bailed	<input type="checkbox"/> Pump	Water level	Discharge	Sample type <u>GRAB</u>
<input checked="" type="checkbox"/> Dipped	<input type="checkbox"/> Tap			
pH (00400)	Conductivity (Uncorrected) <u>50000+</u> μ mho	Water Temp. (00010) $^{\circ}$ C	Conductivity at 25 $^{\circ}$ C (00094) μ mho	
Field comments				

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted <u>1</u>	<input checked="" type="checkbox"/> NF: Whole sample (Non-filtered)	<input type="checkbox"/> F: Filtered in field with 0.45 μ membrane filter	<input type="checkbox"/> A: 2 ml H ₂ SO ₄ /L added
<input checked="" type="checkbox"/> NA: No acid added	<input type="checkbox"/> Other-specify:	<input type="checkbox"/> A: 5ml conc. HNO ₃ added	<input type="checkbox"/> A: 4ml fuming HNO ₃ added

ANALYTICAL RESULTS from SAMPLES

NA	Units	Date analyzed	From <u>NF</u> , NA Sample:	Date Analyzed
<input checked="" type="checkbox"/> Conductivity (Corrected) 25 $^{\circ}$ C (00095)	<u>144828</u> μ mho	<u>1-3</u>	<input checked="" type="checkbox"/> Calcium <u>2132</u> mg/l	<u>12/06</u>
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)	_____ mg/l	_____	<input checked="" type="checkbox"/> Potassium <u>3237</u> mg/l	<u>12/03</u>
<input checked="" type="checkbox"/> Other: pH <u>6.30</u>	_____	<u>12/14</u>	<input checked="" type="checkbox"/> Magnesium <u>8245</u> mg/l	<u>12/06</u>
<input type="checkbox"/> Other: _____	_____	_____	<input checked="" type="checkbox"/> Sodium <u>106850</u> mg/l	<u>12/13</u>
<input type="checkbox"/> Other: _____	_____	_____	<input checked="" type="checkbox"/> Bicarbonate <u>114</u> mg/l	<u>12/14</u>
A-H₂SO₄			<input checked="" type="checkbox"/> Chloride <u>191000</u> mg/l	<u>1/10/90</u>
<input type="checkbox"/> Nitrate-N +, Nitrate-N total (00630)	_____ mg/l	_____	<input checked="" type="checkbox"/> Sulfate <u>2950</u> mg/l	<u>12/19</u>
<input type="checkbox"/> Ammonia-N total (00610)	_____ mg/l	_____	<input checked="" type="checkbox"/> Total Solids <u>357000</u> mg/l	<u>12/22</u>
<input type="checkbox"/> Total Kjeldahl-N ()	_____ mg/l	_____	<input checked="" type="checkbox"/> <u>BROMIDE 40.2</u>	<u>12/12/89</u>
<input type="checkbox"/> Chemical oxygen demand (00340)	_____ mg/l	_____	<input type="checkbox"/> _____	_____
<input type="checkbox"/> Total organic carbon ()	_____ mg/l	_____	<input checked="" type="checkbox"/> Cation/Anion Balance	_____
<input type="checkbox"/> Other: _____	_____	_____	Analyst	Date Reported <u>1/22/90</u>
<input type="checkbox"/> Other: _____	_____	_____		Reviewed by <u>[Signature]</u>

Laboratory remarks 12 8 AM 2 831 06

CATIONS

ANALYTE	MEQ.	PPM	DET. LIMIT
Ca	106.39	2132.00	<3.0
Mg	677.29	8246.00	<0.3
Na	4645.50	106800.00	<10.0
K	82.79	3237.00	<0.3
Mn	0.00	0.00	
Fe	0.00	0.00	

SUMS 5511.96 120415.00

Total Dissolved Solids= 357000
 Ion Balance = 101.11%

ANIONS

ANALYTE	MEQ.	PPM	DET. LIMIT
HC03	1.87	114.00	<1.0
SO4	61.46	2950.00	<10.0
CL	5387.87	##### 191,000	<5.0
NO3	0.00	0.00	< 0.
CO3	0.00	0.00	< 1.
NH3	0.00	0.00	< 0.
PO4	0.00	0.00	< 0.

5451.20 #####

WC No. = 8903922
 Date out/By CD

OIL CONSERVATION DIVISION
 RECEIVED
 90 FEB 2 AM 8 27

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 8:45 AM	Date 4-17-89
Originating Party Pete Hasseloff		Other Parties John Parker WRS III	
Owner/operator Wasserhund			
Subject 1 st qtr Monitoring report status and Financial assurance for DP-321 renewal.			

Discussion

I asked Pete, who was returning my call from last week, if the financial assurances were forthcoming. He stated that his partner was backing out and that he didn't have the where-with-all himself. However he would try to meet the requirement - and inform Gene Samberson that I called. I asked why there was such a disparity between fresh water and brine. Jack Hunter, bookkeeper, stated that the fresh water reported was simply what was sold, not what was injected.

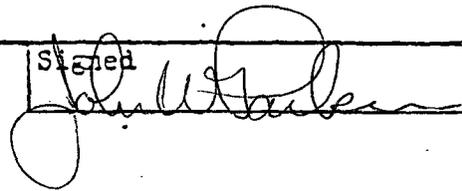
Conclusions or Agreements

I told Mr. Hunter to report fresh water injected and brine produced. If he was unable to do so, then

Distribution

file

Signed



C. GENE SAMBERSON
MICHAEL T. NEWELL

LAW OFFICES
HEIDEL AND SAMBERSON
311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NEW MEXICO 88260
(505) 396-5303

F. L. HEIDEL
(1913-1985)

February 24, 1989

R E C E I V E D

MAR 01 1989

GROUND WATER BUREAU

Mr. Kevin A. Lambert
Hydrologist
Ground Water Section - UIC Program
Environmental Improvement Division
Post Office Box 968
Santa Fe, NM 87504-0968

Re: Wasserhund, Inc.
Discharge Plan DP-321

Dear Mr. Lambert:

Thank you for your letter of February 14, 1989, concerning the above matter.

We have submitted the proposed modifications you suggested to the existing Plugging Bond to the Bonding Company, with the request to inform us whether or not such modifications would be acceptable. We are now informed that the modifications can be accomplished, therefore, a formal request is pending with the Bonding Company to do so, but we have not yet received the amended Bond.

In addition, we are pursuing various matters in an attempt to comply with the financial assurance requirements for Wasserhund, Inc. and as soon as I have that I will be in contact with you.

Very truly yours,

HEIDEL, SAMBERSON, & NEWELL

By *C. Gene Samberson*

CGS:lt

cc: Mr. J. E. Haseloff

C. GENE SAMBERSON
MICHAEL T. NEWELL

LAW OFFICES
HEIDEL AND SAMBERSON
311 NORTH FIRST STREET
POST OFFICE DRAWER 1599
LOVINGTON, NEW MEXICO 88260
(505) 396-5303

F. L. HEIDEL
(1913-1985)

January 31, 1989

R E C E I V E D
FEB 06 1989

GROUND WATER BUREAU
work copy

Mr. Kevin A. Lambert
Hydrologist
Ground Water Section - UIC Program
Environmental Improvement Division
Post Office Box 968
Santa Fe, New Mexico 87504-0968

Re: Discharge Plan DP-321

Dear Mr. Lambert:

I will be assisting Mr. J. E. Haseloff, President of Wasserhund, Inc., in connection with the various matters contained in your letter of August 5, 1988, and January 23, 1989, pertaining to the above captioned matter.

The Bonding Company and the OCD will be contacted for purposes of determining whether or not they are willing to agree to the proposed modifications you have suggested. If the modifications proposed to the plugging bond can be accomplished, you mentioned the need for a Trust Agreement to also be submitted in connection with the plugging bond. I note in the correspondence you have also mentioned that with respect to the irrevocable letter of credit previously furnished a Trust Agreement must be furnished in connection with it. My question is whether or not separate Trust Agreements should be submitted in each instance or if one Trust Agreement involving both the plugging bond and the irrevocable letter of credit would be sufficient. I would appreciate having your earliest response.

In addition to the foregoing, Mr. Haseloff is taking the necessary steps to obtain Financial Statements for the years 1986, 1987 and 1988 as he discussed with you. Same will be furnished as soon as we have received them. Thank you.

Very truly yours,

HEIDEL, SAMBERSON & NEWELL

By *C. Gene Samberson*

CGS:lt

cc: Mr. J. E. Haseloff

1/11/89

EID Review of Wasserhund's Irrevocable Standby Letter of Credit

1. P&A, Decommissioning Surface Facility

- Total Amount \$10,000.00

- Letter of Credit = \$5,000.00

* a.) Need Trust Agreement w/ Letter of Credit
* Note EID letter of August 5, 1988

- OCD one-well plugging bond = \$5,000.00

* a.) EID cannot accept bond in present

form

* b.) ^{form} Initiate new financial assurance (LFA) in EID's name, for \$5,000.00; use financial assurance forms provided in EID letter of 8/5/88

Acceptable forms for FA

- Trust agreement must accompany financial assurance(s)

* c.) Modify existing One-Well plugging bond bond no. 01-0130-328-80

- Proposed Modifications are as follows:

1. SEE EID March 1, 1985 ^{EID} letter to Janica on Salty Dogs Hobs #1

- Trust agreement must accompany bond see 8/5/88 letter from EID

- Hydrogeological Investigation = \$35,000.00

a.) Required in addition to the \$10,000.00 financial assurance for P&A, Decommissioning

↓ Turn Over

b.) May use one of acceptable forms of FA provided in FID Letter of 8/5/88

- Trust Agreement must accompany FA

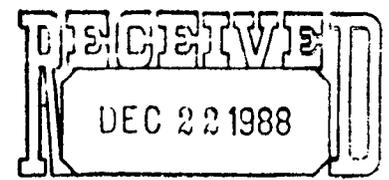
c.) Self insurance may be acceptable

- Include most recent financial statement
- Include previous 2 years financial statements.
- Type of Company e.g. partnership, limited partnership, etc.
- Wasserhund's fiscal year.

Rm

~~_____~~
~~_____~~

Liberty National Bank
P.O. Box 1627
Lovington, New Mexico 88260



EID DIRECTOR'S OFFICE

KAL 1/5/89
WORK COPY

State of New Mexico
c/o Director
Environmental Improvement
Division of the New Mexico
Health and Environment Department
P.O. Box 968
Santa Fe, New Mexico 87504-0968

Dear Sirs:

We hereby establish our irrevocable Standby Letter of Credit No. 354 in your favor, at the request and for the account of Wasserhund Inc., P.O. Box 249, Lovington, New Mexico 88260, up to the aggregate amount of Five Thousand U.S. dollars (\$5000.00), available upon presentation by you of:

1. Your sight draft, bearing reference to this letter of credit, No. 354; and

2. Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the New Mexico Water Quality Act, *74-6-1 et seq. NMSA 1978."

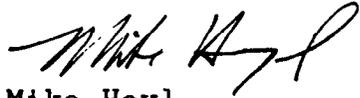
This letter of credit may be drawn on to cover any needed proper closing, plugging and abandonment of a well, and hydrogeologic investigation for ground-water contamination costs arising from the injection well(s) identified below in the amount of Five Thousand U.S. dollars (\$5000.00) annual aggregate.

Discharge Plan DP-321
Eidson State #1

SW 40 acres in the SW1/4; Section 31; Township 16 South; Range 35 East; N.M.P.M., Lea County, New Mexico.

This letter of credit is effective as of 12-19-88 and shall expire on 12-19-89, but such expiration date shall be automatically extended for a period of one year on 12-19-89 and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and Wasserhund, Inc. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event that you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and Wasserhund, Inc. as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of Wasserhund, Inc. in accordance with your instructions. ✓



Mike Hoyl
President & CEO
Liberty National Bank
P.O. Box 1627
Lovington, New Mexico 88260
12-19-88 ✓

This credit is subject to "the most recent edition of the Uniform Customs and Practice for Documentary Credits, published by the International Chamber of Commerce." ✓

FILE REVIEW

Permit No. P-321 Pass Fail

Well Class III Reviewer: Lambert

Operator Wasserhund, Inc Date: 10/15/87

Well Name Wasserhund Well#1 State: NM

Well Location T16S R35E Sec 31 Agency: EID-GWB

Lease Name Edson State Drill Date: 8/21/80

CONSTRUCTION

	size	depth	cement (sacks)	calculated interval
Surface csg.	13 3/8"	35.8'		
Intermediate csg			265 SKS CLASS "O" 570 SKS HALLIBURTON Light Cement	
Long string csg.	7"	1895.0'	CONTAINING 4560# SALT mixed 8# w/ 570, 142# Flocele mixed	
Tubing	2 7/8"	2461.0'	1/4# w/ 570, & 5 SKS CAC mixed	

Hole size 9 7/8" 2% w/ 265

Is construction adequate? yes no

Packer required? yes no

Packer depth _____

Total Depth 2555' 2461'

approved by OCD

HYDROLOGY

USDW Depth (10,000 mg/l) DTW Ogallala 85'

Log Types? State Engineer's Proof of Completion of Well

Faults in area addressed? yes no

Chemical analysis, formation fluid included? yes no

Chemical analysis injected fluid included? yes no

Adequate confining layer? 1690 ft Red Beds yes no

Permitted injection pressure 390 lba

Permitted injection rate _____

Does pressure and rate exceed allowable? _____

Type of injectant Fresh Water

well in Ogallala

GENERAL INFORMATION

Plugging bond or financial assurance included? ___ yes ___ no

Public notice included? yes ___ no

Hearing required? ___ yes no

Citizen comments addressed? *None Received* ___ yes ___ no

Workover, if yes put in general comments ___ yes ___ no

AREA OF REVIEW

Calculated _____ 1/4 mile _____ minimum State AOR _____

Wells in AOR: _____ injection _____ production _____ abandoned

Deficient wells: _____ construction _____ plugging

Wells receiving CA: _____ injection _____ production _____ abandoned

Were all wells addressed for CA? ___ yes ___ no

If no, comments: _____

AOR landowners notified? ___ yes ___ no

Has well received (pressure test) MIT? ___ yes ___ no

Date of most recent MIT _____ ___ pass ___ fail

Has absence of fluid movement been demonstrated? ___ yes ___ no

Enforcement actions included? ___ yes ___ no

If yes, comments: _____

Has well been a SNC? ___ yes ___ no

Is all information in permit? ___ yes ___ no

Is permit issued properly? _____ yes _____ no

Citizen comments and investigations? _____ yes _____ no

If yes, comments: _____

PLUGGING AND ABANDONMENT

Properly Plugged? _____ yes _____ no

Cement Placement	Cement (sx)		
	_____	from _____	to _____
	_____	from _____	to _____
	_____	from _____	to _____

Required Placement		from _____	to _____
		from _____	to _____
		from _____	to _____
		from _____	to _____

GENERAL COMMENTS

Wasserhund Inc.

I General Description

A. -ok-

B. -ok-

C. -ok

D. -ok-

II Specs

A. 1. -ok-

2. -ok-

3. Daily Discharge? (50,000 bbls/ma) ok

4. liner type? -ok- Dupont KRS 20 mm

B. 1. -ok-

2. -ok- (need log)

3. -ok-

4. -ok- 390 psi - need comparison

5. need notification commitment

6. -ok

III Site Characteristics

A. NA

B. Geology

✓ 1. depth to Ogallala & confining layers: } x-section

✓ 2. ~~also~~ need cross-section } sensitive

3. what's below Ogallala?

C. Hydrology

✓ 1. anything above the Ogallala?

2. -ok-

✓ 3. flooding potential - need ~~topo map~~

✓ 4. again, need depth

5. -ok-

6. -ok-

IV Operation

- ✓ A 1. oil wells within 1/4 mile 5-203 A, B. 1; 5205 (C.S)
- 2. " "
- ✓ 3. need to get pressure test
- ✓ ~~4.~~ " cement log commitment
- 4. no means provided?
- 5. " ?
- 6. -ok-
- 7. ^{leakage} present; need sample
- ✓ 8. no monitoring
- ✓ 9. collection system / sump / elevated 180 bbl storage
- ✓ 10. no contingency plans
- ✓ 11. need notification commitment

B. post operational

- ✓ 1. - need plugging and abandonment plan
- ✓ - including surface facility (eg. pond liner removed)
- ✓ - demonstrate adequacy of bond
- ✓ to finance above

V. sign off lacks certification

MONITORING AND REPORTING FORM

ALL BLANKS MUST BE COMPLETED.

CHECK ALL APPLICABLE BOXES

DISCHARGE PLAN NUMBER: 321

ORIGINAL DP:
ORIG. DP PEND. APPROV:

SIC NUMBER: _____

RENEWAL:
RENEWAL PEND:

EID DISTRICT: IV

MODIFICATION:
MODIFICATION PENDING:

NAME OF FACILITY: Wasserhund

LOCATION OF FACILITY: Hwy 8 4 miles S. of Hwy 82

ALTERNATE OR PAST NAME OF FACILITY: _____

CITY OR CLOSEST TOWN: Lovington USGS QUAD: Lovington

COUNTY: Lea TWP: 16 S RGE: 35 E SEC: 31

CONTACT PERSON: Hasehoff, J.E. "Pete" TITLE: President
LAST NAME FIRST NAME

ADDRESS OF CONTACT PERSON: P. O. Box 249 Lovington, NM
88260

TELEPHONE: (505) 396-3128

TYPE OF FACILITY: Brine Manufacturing AND Sales

MEANS OF DISCHARGE (LAGOON, LEACH FIELD, OTHER -SPECIFY): _____

injection well for brine manufacture, lagoon for storage

REVIEWER: (CURRENT) Lambert, Kevin
LAST NAME FIRST NAME

DATE APPROVED: _____ DATE OF EXPIRATION: _____

MONITORING REQ: (COMMENT, IF NECESSARY, ON BACK)

SAMPLING SITE OR ID	STORET CODE (SAMP. SITE)	PARAMETER(S)	DATE DUE
Fresh water Injected Brine water produced		Volume	4x
Storage Lagoon Leak Detection System		Monitor for fluids	4x
Fresh Water Brine Water		TDS, Chlorides	1x

SAMPLING SITE
OR ID

STORET CODE
(SAMP. SITE)

PARAMETER(S)

DATE DUE

Cement Bond Log	within renewal period	

COMMENTS: *Commits to notify EID of any workover and within 48 hours in event of a loss of mechanical integrity, or leak or spill of a significant amount of contaminated water.*

PRE-1977 DISCHARGE FOR WHICH DISCHARGE PLAN HAS BEEN REQUIRED UNDER SECTION 3-106.A. ?

YES ___ NO X

OTHER APPLICABLE PERMITS:

	<u>YES</u>	<u>NO</u>
RCRA	___	<u>X</u>
RADIOACTIVE MAT.	___	<u>X</u>
NPDES	___	<u>X</u>
UST	___	<u>X</u>

STATUS OF DP:

ACTIVE: X
 WITHDRAWN: ___
 EXPIRED, NOT RENEWED: ___
 INACTIVE-TERMINATED OPERATIONS: ___
 INACTIVE- OPERATION PENDING: ___

SEND REPORTS TO:

GROUND WATER SECTION
 EID: GROUND WATER BUREAU
 P.O. BOX 968
 SANTA FE, NM 87504-0968

REVISED: 12/12/86