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707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

March 9, 1993

Mr. William J. LeMay NM Oil Conservation Division State Land Office Building P.O. Box 2088 Santa Fe, NM 87504

CERTIFIED MAIL P 661 764 512

Dear Mr. LeMay:

Please be advised that Unichem International is selling its Rowland Trucking Company subsidiary to Mr. Bob Calhoon, P.O. Box 340, Hobbs, NM 88241.

Attached is a certified letter and signed receipt notifying Mr. Calhoon of the transfer of the following discharge plans.

- Unichem International Inc., Trucker's #2 Brine Station Plan BW-18
- Unichem International Inc., Carlsbad Brine Station Plan BW-19
- Unichem International Inc., Eunice Brine Station Plan BW-16
- Unichem International Inc., Truckers #1 Brine Station DP #370- Well plugged 12/90

If you have any questions please do not hesitate to call or write.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

LWP:jd

cc: B. Clements

R. Brakey

M. Hughes

Environmental File



707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

March 9, 1993

Mr. Bob Calhoon Rowland Trucking Company Inc. P.O. Box 340 Hobbs, NM 88241 **CERTIFIED MAIL P 661 764 513**

Dear Mr. Calhoon:

Pursuant to the State of New Mexico Water Quality Control Commission and to the Energy and Minerals Department Oil Conservation Division Rules and Regulations, Unichem International is required by law to notify you that we are transferring the following discharge permits to your company.

- Unichem International Inc., Trucker's #2 Brine Station Plan BW-18
- Unichem International Inc., Carlsbad Brine Station Plan BW-19
- Unichem International Inc., Eunice Brine Station Plan BW-16
- Unichem International Inc., Truckers #1 Brine Station DP #370- Well plugged 12/90

For your reference please find WQCC Part 3-111 (transfer of Discharge Plan) attached.

If you have any questions please do not hesitate to call or write.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

LWP:jd

cc:

B. Clements

Wayne Price

R. Brakey

M. Hughes

Environmental File

| Put your address in the "RETURN TO" from being returned to you. The return | Space the reverse receipt will provide to the following service: e(s) requested. e, and addressee's ad | services are desired, and complete items side. Failure to do this will prevent this card you the name of the person delivered to and s are available. Consult postmaster for fees dress. 2. Restricted Delivery (Extra charge) |
|---|---|---|
| 3. Article Addressed to: Mr. Bob Calhoon Rowland Trucking Com P.O Box 340 Hobbs, NM 8824 | mpany | 4. Article Number p 661 764 513 Type of Service: Registered COD Servified COD Express Mail Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED. |
| 5. Signature – Addressee X 6. Signature – Agent X 7. Date of Delivery | lus 31)9 | 8. Addressee's Address (ONLY if requested and fee paid) |
| S Form 3811, Apr. 1989 | +U.S.G.P.O. 1989-238-815 | DOMESTIC RETURN RECEI |



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

OCT 1 2 1988

GROUND WATER BUREAU

October 10, 1988

VIA CERTIFIED MAIL: P 713 502 790

John Parker, Water Resource Specialist Ground Water Section State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968

SUBJECT:

PROGRESS REPORT - TRUCKERS #1 BRINE STATION

Dear Mr. Parker:

Unichem International has complied with the EID's recent request for a well workover and cement bond log for Truckers #1.

The workover was unsuccessful from the standpoint that we could not re-enter the hole due to downhole obstructions located at approximately 1,900 feet. This does not mean that the well is going to be abandoned or that it is obsolete; at this point, it is strictly a temporary abandonment until economic conditions warrant the well re-entry.

Enclosed is a sheet detailing the amount of money spent on the well to date in efforts to re-enter the hole, which equates to approximately \$57,000. As indicated, the current state of the oilfield economy is forcing us to stop until better conditions warrant further re-entry efforts.

Also enclosed is the acoustic cement evaluation log and a letter from CRC Wireline Company. Briefly, the letter states that the bond log looks very good, and we are submitting the log as evidence for future permitting efforts. The full workover well log will be forwarded to your attention once it has been completed and received by our office.

The well has been capped and filled with a water-soluble corrosion inhibitor to prevent pipe corrosion in the interim period. We anticipate that well re-entry will occur within a one-year period.

Mr. John Parker Page Two October 10, 1988

Please do not hesitate to contact me if you have any questions.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price Staff Engineer

LWP:mms

Enclosures

cc: Kevin Lambert, New Mexico E.I.D.

Truckers #1

- 8-26-88 Moved and reset pump house and pump; removed well house.
- 9-06-88 Rigged up DA&S Well Service Co. and pulled 2 7/8" tubing. Pulled 70 joints and 20' of another joint. Left 3 joints and a piece plus a $4\frac{1}{2}$ " bit in the well.

Rigged up Petco reverse unit.

Rigged up to pull $5\frac{1}{2}$ " casing. Pulled up to 130,000 lbs. on casing with pulling unit. Casing would not come loose.

Rigged up Rotary Wire Line and shot well head to loosen slips. Did not loosen slips.

Called Ron's Welding to cut well head off. Started to cut well head off and $5\frac{1}{2}$ " casing dropped down hole with 80,000 lbs. pulled on it. 2,120' of $5\frac{1}{2}$ " 15 lb. casing should weigh 33,000 lbs.

9-07-88 Rigged up DA&S' casing jacks and picked up to 185,000 lbs. to get slips out of well. Sat back down. Cut well head and collar off 8 5/8" casing. Rewelded 8 5/8" collar on casing.

Rigged up Rotary Wire Line and ran 3 points in to $5\frac{1}{2}$ " casing to find out where the casing was stuck. Stuck at 1,918'. Tried to run chemical cutters and cut casing. Cutters would not go. Ran jet cutters and cut $5\frac{1}{2}$ " casing at 1,881'. Pulled on casing to 175,000 lbs.; did not get a complete cut. Went back into casing to 1,883' and made another cut. Had a complete cut. Rigged Rotary Wire Line down and removed casing jacks. (There was 47 joints and a piece.) There was 2,120' of $5\frac{1}{2}$ " casing in the well. Cut off and pulled 1,883' out of well. There was 4 bad joints plus the part of a joint.

Unloaded washover pipe and drill pipe and shut down.

- 9-08-88 Picked up klusterite mill and drill pipe; ran into well. Milled on $5\frac{1}{2}$ " casing to smooth off cut. Milled $1\frac{1}{2}$ ' and pulled out of hole. Picked up wash pipe and shut down for the day.
- 9-09-88 Finished picking up collars and jars and went into hole. Started washing over $5\frac{1}{2}$ " casing at 1,914'. Washed and milled to 1,927'. 8' of the 13' was very slow milling. Pulled out of the hole. Left 1 joint of washover pipe (28') and a klusterite shoe $3\frac{1}{2}$ ' in the well. Shut down for the day.
- 9-10-88 Rigged up CRC Wire Line and calipers to see what size pipe was in the well. Ran calipers from 1,850' up. Ran bond log to check cement to 8 5/8" casing from 1,850' up. Shut down for the day.
- 9-11-88 Shut down.
- 9-12-88 Went into hole with impression block. Showed $5\frac{1}{2}$ " casing leaning to one side. Rigged up Rotary Wire Line and ran chemical cutter; would not go into $5\frac{1}{2}$ " casing. Ran jet cutters; would not go into $5\frac{1}{2}$ " casing.

Ran $3\frac{1}{2}$ " collar locater; would not go into $5\frac{1}{2}$ " casing. Ran $1\frac{1}{2}$ " collar locater; would not go into $5\frac{1}{2}$ " casing. Rigged Rotary Wire Line down and went into hole with overshot and drill pipe. Latched onto $5\frac{1}{2}$ " casing. Rigged Rotary Wire Line back up and ran 3 shots or charges into well to loosen $5\frac{1}{2}$ " collar and back it off. Did not loosen. Then ran 3 point into well to check where the pipe was stuck. We were stuck below the collar. Pulled the 3 point out of the well and ran another charge into casing to back off collar. Collar was backed off. Pulled out of the hole with drill pipe. Overshot a piece of the $5\frac{1}{2}$ " casing and part of the washover pipe about 1' to $1\frac{1}{2}$ '. Shut down for the day.

- 9-13-88 Picked up spear and went in the hole with the drill collars and drill pipe. Could not catch the fish. Pulled out of the hole and went back with 6" mill. Started milling on $5\frac{1}{2}$ " casing at 1,884'. Milled about 3'. Pulled up into 8 5/8" casing and shut down for the day.
- 9-14-88 Started milling. Milled for a few minutes and everything dropped 10'. Pulled out of the hole and went back in with a spear. Unable to spear washover pipe. Pulled out of the hole and ran overshot and tried to get over $5\frac{1}{2}$ " casing. Could not get over $5\frac{1}{2}$ " casing. Pulled out of hole and ran spear in well and could not get into $5\frac{1}{2}$ " casing. Pulled back out of hole and shut down for the day.
- 9-15-88 Picked up 7 3/4" mill and went into hole and started milling. Milled 7' of hard to semi-hard milling. Pulled out of the hole and picked up impression block and went back into the hole. Pulled impression block out of well; showed to be on rock. Shut down for the day. Hauled off 700 bbls. of fluid.
- 9-16-88 Rigged up Rotary Wire Line and ran calipers to see where the end of the 8 5/8" casing was. It was at 1,887'. Then went in the hole with a 7 5/8" bit and drilled $4\frac{1}{2}$ ' to iron. Pulled out of the hole and went back into the hole with a 7 3/4" mill. Milled 14". Pulled up into the 8 5/8" casing and shut down till Monday. Hauled off 1,050 bbls. of fluid.
- 9-18-88 Shut down.
- 9-19-88 Fueled up pulling unit with diesel. Diesel tank was emptied while shut down.

 Went in hole with $7\frac{1}{4}$ " tapered mill and started milling. Milled 3' and pulled out of hole to check the mill. The mill was wore on the outside and cut out on the inside. Shut down for the day. Hauled 715 bbls. of fluid off.
- 9-20-88 Layed down washover pipe and ran $5\frac{1}{2}$ " casing to 1,749". Layed down drill pipe and drill collars. Layed down 10 joints of 2 7/8" tubing (305.84"). Then ran 1,821.79" of 2 7/8" tubing into well. Released all equipment. Hauled 24 joints (746.33") of 2 7/8" tubing in. Doped threads and put on rack in yard. Also brought in 3 joints of bad $5\frac{1}{2}$ " casing.

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| | ROTAGE Wire line | 4,776.20 | |
| | Rowland + Eurice Paris Tool | 6,1.79.90 | |
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| | Examers | 319.29 | |
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WEDGE CRC, Inc.

P.O. Box 1920 Hobbs, New Mexico 88240

September 12, 1988

Rowland Trucking 418 S. Grimes Hobbs, New Mexico 88240

RE: Truckers #1 CBL log.

After a review of the Acoustic Cement Evaluation run on 9-10-88, I offer these opinions:

- 1. Excellent bonding is apparent between 106' and 422', this has an average bond index of 90%.
- 2. From 244' to 580' bonding is weak with a B.I. of approximately 30%. This indicates something (mud, cement, etc.) exists between these two points. I don't believe this could be squeezed.
- 3. From 580' to 1315', B.I. approximately 60%.
- 4. From 1315' to 1420', B.I. = 90%.
- 5. From 1420' to 1592', B.I. = 70%.
- 6. From 1592' to 1800', B.I. = 90%.

My opinion is that the cement bond is adequate to good to prevent zone communication.

If we may be of further assistance, do not hesitate to call.

Sincerely,

Jim Sizemore

District Manager



GARREY CARRUTHERS
Governor

ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director CARLA L. MUTH Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 19, 1988

James H. Brutton, President Unichem International, Inc. P.O. Box 1499 Hobbs, NM 88240

RE: Approval of DP-370 and DP-371

Dear Mr. Brutton:

Pursuant to the Settlement Agreement entered into by Unichem International, Inc. (Unichem) and the Environmental Improvement Division (EID) on February 24, 1988, as amended May 5, 1988, EID has reviewed all financial assurance materials submitted by Unichem, and hereby certifies that it has found these financial assurances to be adequate. This terminates Unichem's obligations under the Settlement Agreement.

The applications for renewal of discharge plans DP-370 and 371 for Trucker's #1 and Trucker's #2 respectively in Lea County, New Mexico are hereby approved. The approved discharge plan renewals consist of the materials dated September 17, and 22, 1987; December 22, 1987; March 17, 1988; May 5, 1988, May 17, 1988; June 6, 1988; June 29, 1988; June 30, 1988; and July 7, 1988, plus the information and materials submitted as part of the original discharge plan approved December 18, 1982.

The discharge plan renewal applications were submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109. Please note: Subsections 3-109. E. and 3-109. F., which provide for possible future amendment of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Monitoring and reporting shall be as specified in the discharge plan and supplements thereto. These requirements are summarized on the attached sheets. Any inadvertent omissions from this summary of a discharge plan monitoring or reporting requirement shall not relieve you of responsibility for compliance with that requirement.

JAMES H. BRUTTON July 19, 1988 Page 2.

Pursuant to Subsection 3-109.G.4., these plan renewals are for a period of five years. This approval will expire July 18, 1993, and you should submit an application for a new approval in ample time before that date.

On behalf of the staff of the Ground Water Section I wish to thank you for your cooperation during these discharge plan reviews.

\$incerely,

Michael Burkhart

Director

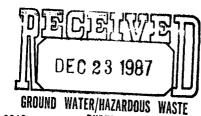
MB:JP:

cc: Garrison McCaslin, EID District IV Manager, Roswell Wayne Price, Unichem Staff Engineer

Gini Nelson, HED Office

BRINE STATION INSPECTION FORM





BUREAU

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

December 22, 1987

VIA FEDERAL EXPRESS: Airbill #3287718803

John Parker, Water Resource Specialist Ground Water Section State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968

SUBJECT:

Truckers #1 Brine Station - Hobbs, New Mexico

Discharge Plan Submittal #4

Dear Mr. Parker:

The information contained herein is provided in response to your verbal request of 21 December for clarification regarding Comment No. 7 as addressed in Unichem's Discharge Plan Submittal #3 of December 11, 1987.

Comment No. 7:

Unichem International needs to submit a plugging and abandonment plan for our review. This plan should also include decommissioning of surface facilities. Copies of the blanket plugging/surety bonds submitted for Truckers #1 and #2 (Exhibits 6 and 3 respectively) have been forwarded to our Legal Bureau for review. Please submit documentation that demonstrates the \$50,000 sum of each bond is adequate to properly plug and abandon the brine wells (5-209.A.).

Clarification regarding Response of December 11, 1987:

<u>Plugging and Abandonment Plan</u>: A bridge plug will be set at the top of the salt formation and 200' of cement will be poured into the well casing, constituting a 200' plug to begin at the top of the salt formation (approximately 1,900' above sea level) and to extend upward approximately 200'.

Another bridge plug will be set approximately 50' below the Ogallala formation (approximately 3,650' above sea level), to extend upward to the surface of the

UNICHEM INTERNATIONAL INC.

Mr. John Parker Page Two December 22, 1987

well casing. This plug will have a minimum depth of 200'. A P&A marker will then be set at the surface, which represents an approximate ground level elevation of 3,830' above sea level. Please note that the elevation measurements provided herein were obtained from the cross section geology map A - A' previously submitted in Exhibit #3-3 of Submittal #3.

<u>Decommission of Surface Facilities</u>: The surface facilities will be removed as outlined in the Detailed Estimate previously provided in our response to Comment No. 7, Submittal #3.

Documentation regarding Adequacy of Blanket Plugging/Surety Bond: Please note that the removal documentation provided in the Detailed Estimate referenced above also provides information demonstrating that the \$50,000 Blanket Plugging/Surety Bond is adequate to cover the costs that would be incurred in the event that plugging and abandonment is required.

Unichem International is very interested in completing the process for obtaining a discharge plan permit for Truckers #1. Therefore, if any additional information for permitting is required, please contact me immediately so that we can take the necessary action to comply.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price Staff Engineer

LWP:mms



ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS
Governor

LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

November 2, 1987

Wayne Price Unichem International P.O. Box 1499 Hobbs, NM 88240

Dear Mr. Price:

The Environmental Improvement Division (EID) Ground Water Section has completed review of Unichem International's September 17 and 22, 1987 submittals for renewal of discharge plan numbers 370 and 371 respectively. The comments and additional information requested herein apply to both facilities unless designated otherwise. As correctly stated in your cover letters to the previously referenced submittals, the focus of our review for both brine well renewals is on conformance to Part V of the Water Quality Control Commission (WQCC) Regulations.

Comments and informational requests are itemized as follows (WQCC regulatory reference follows in parenthesis):

- 1. The Discharge Plan Signatory Requirement (Exhibit 11) lacks the certification: "I certify under penalty of law ..." which should precede signature. (5-101.H.2).
- 2. The number of water wells within the area of review, and the status of these wells is difficult to determine for the Truckers #1 Brine Station. There appears to be more than two wells listed in Exhibit 8, however the penciledin legend at the top of the page states that the two wells are listed twice, even though the location for at least one of the wells listed is different. Please clarify (5-203.A).
- 3. In order to determine existence of possible conduits for fluid movement, an integral aspect of the Part V MIT requirements, Unichem International must commit to performing a cement bond log at some point during the five year renewal period (5-204.B.2 and 5-205.A.4.b.).
- 4. Unichem International needs to make a commitment to notify this office "prior to commencement of drilling, cementing and casing, well logging mechanical integrity tests and any other well workover ..." (5-205.A.5).

Wayne Price November 2, 1987 Page 2

- 5. Please provide a comparison of fracture pressure for salt at injection interval (approximately 2,100 feet) with the down-hole pressure resulting from the maximum operating pressure (300 psi for Truckers #1, 450 psi for Truckers #2) (5-206.A.1.).
- 6. Please provide a letter of authorization for Wayne Price so as to comply with report signatory requirements (5-208.C.1.).
- 7. Unichem International needs to submit a plugging and abandonment plan for our review. This plan should also include decommissioning of surface facilities. Copies of the blanket plugging/surety bonds submitted for Truckers #1 and #2 (Exhibits 6 and 3 respectively) have been forwarded to our Legal Bureau for review. Please submit documentation that demonstrates the \$50,000 sum of each bond is adequate to properly plug and abandon the brine wells (5-209.A.).
- 8. Maps submitted for Truckers #1 and #2 depicting area of review lack reference scale. Please submit maps including scales and with the $\frac{1}{4}$ mile area of review drawn in (5-210.B.2.).
- 9. Please provide maps showing vertical and horizontal limits of all ground water having less than 10,000 mg/l TDS (5-210.B.5.). Also, we need water quality information for water-bearing formations penetrated by brine well (3-106.C.3.).
- 10. Please provide generalized and specific maps and cross-sections depicting both the regional and site-specific geology (5-210.B.6 and 7).
- 11. Please provide a detailed contingency plan which at a minimum address: surface spills of brine and loss of mechanical integrity in the injection well (5.210.B.15).
- 12. The chemical analysis of samples taken from the Trucker #2 monitor sump (Exhibit 7) indicates an exceedance of the 3-103 standards for magnesium, chloride and TDS. Please explain what has caused the violation of the standards and what plans you have to prevent further contamination.

Should you have any questions, please feel free to contact Mr. Kevin Lambert (827-2902) or myself (827-0027).

Sincerely,

John Parker

Water Resource Specialist

Ground Water Section

JP:egr

cc: Garrison McCaslin, EID District IV Manager, Roswell Roelf Ruffner, EID Field Office, Hobbs

REQUEST-FOR LEGAL SERVICES

| NAME OF CASE: Truckers # 1 and #2, Unichem Int. |
|--|
| REQUEST MADE BY:Ohn W Pair Ken, WRS I Groundwater Bur Name, Title, and Bureau OK |
| APPROVAL OF BUREAU CHIEF: (Signature) RECEIVED |
| APPROVAL OF LEGAL LIAISON: (Signature) NOV 04 1987 |
| DATE OF REQUEST: 10/28/87 GROUND WATER HAZARDOUS WASTE BUREAU |
| FERSON ATTORNEY SHOULD CONTACT: Regulator No. 0027 |
| PRIORITY: EMERGENCY (explain) NORMAL LOW |
| DUE DATE (Deadline) A.S.A.P NATURE OF REQUEST: See attatched { 2. Are attached specific hards a key? |
| NATURE OF REQUEST: See attatched } |
| Please provide a memo or narrative description, and attach any other documentation explaining the assistance sought. |
| PLEASE FILL IN AS APPLICABLE: |
| SPECIAL INSTRUCTIONS: |
| |
| To be completed by Deputy General Counsel |
| This matter has been referred to Gini Nelsm on 11/3/77 |
| with the following instructions <u>See me about these</u> |
| (Where applicable) This matter has been transferred to |
| on with the following instructions |
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| Internal # |
| Deputy General Counsel |
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John Parker Ground Water Burrow



ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director

GARREY CARRUTHERS Governor

> LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

MEMORANDUM

TO:

Louis Rose, HED Office of General Counsel

FROM:

John Parker, Ground Water Section

SUBJ:

Review of Blanket Plugging Bonds for Brine Wells

DATE: October 30, 1987

The Ground Water Section's Underground Injection Control (UIC) program is working on discharge plan renewal for the first two of eight brine well facilities due to expire in 1987. All eight facilities were initially permitted by the Oil Conservation Division (OCD) and now must comply with the requirements of Part V of the WQCC regulations. Renewals conducted by former UIC staffers involved substantail changes to the terms of the bond (see attached September 17, 1985 correspondence from Page Morgan). However, my reading of 5-210.B.17 is that the existing bonds posted to the OCD are at least in that respect adequate.

JP:egr

Attachment



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010



October 22, 1987

VIA CERTIFIED MAIL: P 241 450 308

Mr. Kevin Lambert, Hydrologist Ground Water & Hazardous Waste Bureau State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968

SUBJECT: True

Truckers #1 Brine Station - Hobbs, New Mexico

Discharge Plan Submittal #2-A

Dear Kevin:

The installation of two concrete loading pads indicated in our second submittal for the Discharge Plan on Truckers #1 has been completed. The enclosed pictures are provided for your reference and depict the completed installation.

If you have any questions, please do not hesitate to contact me.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

LWP:mms

Enclosure



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

TRUCKERS #1 BRINE STATION

DISCHARGE PLAN SUBMITTAL #2-A OCTOBER 22, 1987







TRUCKERS #1 BRINE STATION
COMPLETED INSTALLATION OF CONCRETE
LOADING PADS



ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS
Governor

LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 7, 1987

Truckers #1 Brine Station Wayne Price, Engineer Unichem International 707 North Leech P.O. Box 1499 Hobbs, New Mexico 88240

Dear Mr. Price:

Enclosed is a copy of the public notice pertaining to your proposed discharge which was issued by this division pursuant to New Mexico Water Quality Control Commission Regulations, Section 3-108.

If you have any questions, please do not hesitate to contact me at the address listed above or at phone number (505) 827-2900.

Sincerely,

Ernest C. Rebuck Program Manager Ground Water Section

ECR/mp

Enclosure

| | | P3 Form | 3000, | - ರಚನ | 9 1 9 3 | 95 | | | | Ú.S | 3.G.P. | O. 18 | 3-506 | - | |
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| 9() (line | 9 | | Postmark or Date | TOTAL Postage and Fees S | Return Receipt showing to whom, Date, and Address-of Defivery | Return Receipt showing to whom and Date Delivered | Restricted Delivery Fee | HoldenSelly Weatherico 88240 | டீசுமி _{ச்ச} இல 1499 | 787agNorth Leech s | Undichemon Atemational | Wayne Price, Engineer | Sent to Truckers #1 Brine Station | RECEIPT FOR CERTIFIED MAIL NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL (See Reverse) | P-484 024 922 |
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ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS
Governor

LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 7, 1987

The Honorable JoAnn Martin, Mayor City of Hobbs P.O. Box 1117 Hobbs, New Mexico 88240

Dear Mayor Martin:

Enclosed is a public notice which includes notice of a proposed discharge plan(s) for one or more operations in or near your city.

If you have any questions, please do not hesitate to contact me at the address given above or at 827-2900.

Sincerely,

Ernest C. Rebuck Program Manager

Ground Water Section

ECR/mp

Enclosure

| 114 | | | | | | | | | | | | |
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| (a) (b) | | | S | | | | | | 88240 | . : | | |
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ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS
Governor

LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 7, 1987

Board of County Commissioners Lea County Courthouse 215 East Central Lovington, New Mexico 88260

Board of County Commissioners:

Enclosed is a public notice for one or more operations located in your county.

If you have any questions, please do not hesitate to contact me at the address listed above or at phone number (505) 827-2900.

Sincerely,

Ernest C. Rebuck Program Manager

Ground Water Section

ECR/mp

Enclosure

| P3 Form 3860, June 1985 U.S.G. | | | |
|---|---|---|---------------|
| Fee Fee howing to whom, ss of Delivery and Fees | Boderd of County Commissioned Emai county Courthouse 295smaggard American | FOR CERTIFII ISURANCE COVERAGE PRO IT FOR INTERNATIONAL M (See Reverse) | 9E6 h20 h9h-d |

OCTOBER 5, 1987

TO BE PUBLISHED ON OR BEFORE OCTOBER 14, 1987

PUBLIC NOTICE NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION

Notice is hereby given that, pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the New Mexico Environmental Improvement Division, P.O. Box 968, Santa Fe, New Mexico 87504-0968; telephone 827-2900.

(DP-520) ALBUQUERQUE UTILITIES CORPORATION, Mr. Raymond Lucero, 4300 Sara Road, Rio Rancho, New Mexico 87124, proposes to discharge 29,000 gallons per day of domestic and commercial sewage to a lined, aerated lagoon located at T12N, R2E, Section 11, Sandoval County. The treated sewage will then be land applied to 14 acres of undeveloped rangeland approximately 1 mile from the lagoon. The estimated total nitrogen content of the discharge is 32 mg/l. The depth to groundwater in this area is 625 feet with a total dissolved solids content of 250 mg/l.

(DP-471) KIT CARSON CHILE PROCESSING PLANT, Nick and Rena Carson, Owners, P.O. Box 101, Rincon, New Mexico 87940, propose to modify their previously approved discharge plan for the disposal of 35,000 gallons per day of chile wash water to five acres of cropland. The facility is located in the NE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 7, T19S, R2W, NMPM in Dona Ana County. The proposed modification requests that the groundwater monitoring frequency be reduced from biweekly during the months of September to January and monthly during the months of February to August to a frequency of three times per year (August, November and February). The groundwater most likely to be affected is at a depth of approximately 15 feet with a total dissolved solids content of approximately 4000 mg/l.

LAS CRUCES, THE CITY OF, D. Craig Andrews, Associate Director of Wastewater, P.O. Drawer CLC, Las Cruces, New Mexico 88004, proposes to renew the approved discharge plan for the disposal of digested municipal sludge. The current flowrate is 35,000 gallons per day with a 2% solids content. The design flowrate is 61,200 gpd at 4% solids. The sludge is land applied in T23S, R1W, Section 25, $SE_{\frac{1}{4}}$, NMPM in Dona Ana County. The groundwater most likely to be affected is at a depth of approximately 300 feet with a total dissolved solids content of approximately 700 mg/l.

(DP-519) LOVELACE I.T.R.I., J.J. Thompson, P.O. Box 5890, Albuquerque, New Mexico 87185, proposes to continue discharging approximately 35,000 gallons per day of liquid waste from their Biomedical Research Laboratory and Animal Housing facility to a system of six lagoons. This discharge consists of the following: kennel washwater (15%), cage washwater (15%), sewage from restrooms, lab sinks, and cafeteria (20%), mechanical (pump cooling and sealing) and boiler and cooling tower blowdown (50%). The discharge has between 60 and 90 mg/l Nitrate (as NO₃) and is located at T8N, R4E, Section 3 in Bernalillo County. The depth to groundwater in this area is approximately 60 feet with a total dissolved solids content of 870 mg/l.

(DP-247) MOUNTAIN SHADOWS NURSING HOME, H.W. Handy, Executive Director, 1005 Hill Road, Las Cruces, New Mexico 88005, proposes to renew the approved discharge plan for the disposal of domestic wastewater into a septic tank/leachfield system. The discharge, with an estimated flowrate of 2,500 gallons per day, is located at T22S, R1E, Section 5, NMPM in Dona Ana County. The ground water most likely to be affected is at a depth of approximately 10 feet with a total dissolved solids content of approximately 1000 mg/l.

e 2 - 1-1

(DP-176) PUBLIC SERVICE COMPANY OF NEW MEXICO, H.L. Plum, Senior Regulatory Coordinator, Alvarado Square, Albuquerque, New Mexico 87158, proposes to modify its previously approved discharge plan for Units 3 and 4 Coal Yard Runoff Basin located at the San Juan Generating Station, T30N, R15W, Section 21, NMPM in San Juan County. The present discharge plan allows the basin to be used for retaining stormwater runoff from the Units 3 and 4 coal piles, emergency upset flows in the ash handling area and other miscellaneous flows. The plan requires PNM to pump the pond water to the water treatment system when the pond water depth exceeds 1.5 feet and the total dissolved solids (TDS) content exceeds 6,000 mg/l. The proposed modification requests the pond water TDS be allowed to increase to 10,000 mg/l before pumping to the water treatment system. The groundwater most likely to be affected is within the Shumway/Westwater arroyo system at a depth of approximately 25 feet with a total dissolved solids content of approximately 15,000 mg/l.

(DP-254) RATON, CITY OF, Eric Honeyfield, Public Works Director, P.O. Box 910, Raton, New Mexico 87740, proposes to renew previously approved discharge plan (DP-254) which allows for the land application of approximately 600,000 gallons per day of treated wastewater to 204 acres and 43,000 gallons per day of sludge to 20 acres of land in Section 6, T30N, R24E, Colfax County, New Mexico. The groundwater below the site is at a depth of approximately 60 feet and has a total dissolved solids concentration of approximately 900 mg/l.

(DP-516) RIP GRIFFIN TRUCK SERVICE, Bill Riggs, P.O. Box 1104, Moriarty, New Mexico 87035, proposes to continue discharging separated water from a 10,000 gallon underground storage tank to an unlined pit with approximately 2720 cubic feet of total capacity. The underground storage tank receives diesel and oil spills plus rainwater runoff via a drain located in the vicinity of the gasoline pumps. Periodically, the water which collects in this tank is siphoned off into the unlined pit described earlier. A trench, which is located at the southern end of the property and has the approximate dimensions of 500 feet by 8 feet by 4 feet, collects additional rainwater runoff mixed with oil and fuel from 15 acres of paved area associated with the truck service. The location of this facility is T9N, R8E, Section 14 in Torrance County. The depth to groundwater in this area is approximately 78 feet with a total dissolved solids content of approximately 870 mg/l.

(DP-227) S & T Dairy, Sid Tuls, Owner, Route 2, Box 154W, Roswell, New Mexico 88201, proposes to renew the approved discharge plan for the disposal of milking center wastewater through land application to cropland, The dairy is located in T11S, R24E, Section 36, NMPM in Chaves County. The estimated flowrate is 94,500 gallons per day. The ground water most likely to be affected is at a depth of approximately 40 feet with a total dissolved solids content of 3000 to 4000 mg/l.

(DP-222) TAOS PHOTOGRAPHIC LABORATORY, J. Gordon Adams, Owner, P.O. Box 2446, Taos, New Mexico 87571, proposes to renew previously approved discharge plan (DP-222) which allows for the discharge of 1400 gallons per day of photographic processing washwater onto 2 acres of land and an intermittent flow of processing solutions into a fiberglass holding tank to be periodically emptied by a commercial service. The discharge site is located 1.4 miles west of Taos in Section 18, T25N, R13E, Taos County, New Mexico. Groundwater below the site is at a depth of 3 feet and has a total dissolved solids concentration of 305 mg/l.

(DP-232) TAOS, TOWN OF, The Honorable Lawrence A. Santistevan, Mayor, P.O. Drawer M, Taos, New Mexico 87571, proposes to modify the public notice published on or before April 10, 1987. The modification consists of changing the sludge application site to 32 acres adjacent to the previously used site to the south and southwest.

(DP-370) TRUCKERS #1 BRINE STATION, Wayne Price, Engineer, Unichem International, 707 North Leech, P.O. Box 1499, Hobbs, New Mexico 88240, proposes to renew their approved discharge plan (DP-370) for a brine water in situ extraction well and surface facility located at Section 1, T19S, R35E, Lea County, New Mexico. The operation involves injection of fresh water into an underlying salt formation thereby dissolving the salt and forming a brine water solution which is then extracted via a production well and used for oil and gas production. The groundwater below the site is at a depth of 70 feet and has a total dissolved solids concentration of approximately 500 mg/l.

(DP-371) TRUCKERS #2 BRINE STATION, Wayne Price, Engineer, Unichem International, 707 North Leech, P.O. Box 1499, Hobbs, New Mexico 88240, proposes to renew their approved discharge plan (DP-371) for a brine water in situ extraction well and surface facility located at Section 33, T18S, R38E, Lea County, New Mexico. The operation involves injection of fresh water into an underlying salt formation thereby dissolving the salt and forming a brine water solution which is then extracted via a production well and used for oil and gas production. The groundwater below the site is at a depth of 60 feet and has a total dissolved solids concentration of approximately 500 mg/l.

Any interested person may obtain further information from the Ground Water Section, Ground Water Bureau, EID, and may submit written comments to the Director of the EID at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of EID will allow thirty (30) days after the date of publication of this Notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why the hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

<u>- Unichem international</u>

707 N LEECH, HOBBS NM 88240 505-393-7751

JUNE 13, 1987

MR. KEVIN A. LAMBERT, HYDROLOGIST GROUND WATER & HAZARDOUS WASTE BUREAU STATE OF NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION P. O. BOX 968, RUNNELS BUILDING SANTA FE, NM 87504-0968



DEAR KEVIN,

SUBJECT: TRUCKERS #1 BRINE ST HWY 529 W OF HOBBS DISCHARGE PLAN DP-30

TRUCKERS #2 BRINE ST BRDY PL-HOBBS DP-371

PER OUR TELEPHONE CONVERSATION ON JUNE 1, 1987 CONCERNING SECTION 5-101.G. OF THE WQCC REGS REQUIRING THE REPORTING 180 DAYS BEFORE EXPIRATION DATE WHICH IS DUE JUNE 15, 1987, WE WOULD LIKE TO REQUEST AN EXTENSION OF 60 DAYS AS DISCUSSED DURING OUR TELEPHONE CONVERSATION.

AT THAT TIME WE WILL SUBMIT A COMPLETE PART 5 SUBMITTAL PER YOUR REQUEST. KEVIN IF THIS DOES NOT FIT IN YOUR TIME FRAME FOR EVALUATING UPCOMING PROPOSALS PLEASE LET US KNOW AND WE WILL MAKE OTHER ARRANGMENTS. PLEASE NOTE THAT WE HAVE RAN MECHANICAL INTEGRITY TEST ON BOTH WELLS AND HAVE BEEN SENT TO YOU AND SHOULD BE ON FILE THIS YEAR.

TRUCKERS #2 TEST SENT FEB 27, 1987 DP-371 TRUCKERS #3 TEST SENT MAR 4, 1987 DP-370

IF YOU HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO CONTACT MY OFFICE.

SINCERELY,

UNICHEM INTERNATIONAL INC.

WAYNE PRICE STAFF ENGINEER

WP:WP

CC: RICHARD BRAKEY

6/1/87

Wayne Price / Unichem Called RF: Trucker #1 # #2
Wanting to know about June 15, '87
deadline which allows discharger to keep operating if DP experies
Toldhim to send in documentation by June 15, so that we have
something on record. We will then evaluate information and determine applicability of 5-101. 6.
and let you know status.

Levi Loud



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

March 4, 1987

VIA CERTIFIED MAIL: P169568908

Mr. Kevin A. Lambert, Hydrologist Ground Water & Hazardous Waste Bureau State of New Mexico Environmental Improvement Division P.O. Box 968, Runnel Building Santa Fe, NM 87504-0968

Dear Kevin,

SUBJECT:

Truckers #1 Brine Station

Highway 529, 10 Miles West of Hobbs, New Mexico

Please find enclosed an integrity well test performed on our brine well located 10 miles west of Hobbs on Highway 529. Please accept this as the first portion of our required application for a discharge plan under the new requirements to become effective in 1988.

For your information, we will be submitting a more detailed plan for the brine well in the future. In the meantime, I believe that you should already have information on hand from the Oil Conservation Division for Truckers #1, along with detailed plans for the pending upgrade.

If you have any questions, please do not hesitate to contact me.

Sincerely,

UNICHEM INTERNATIONAL INC.

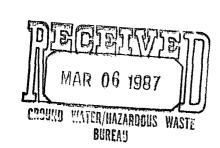
Wayne Price Staff Engineer

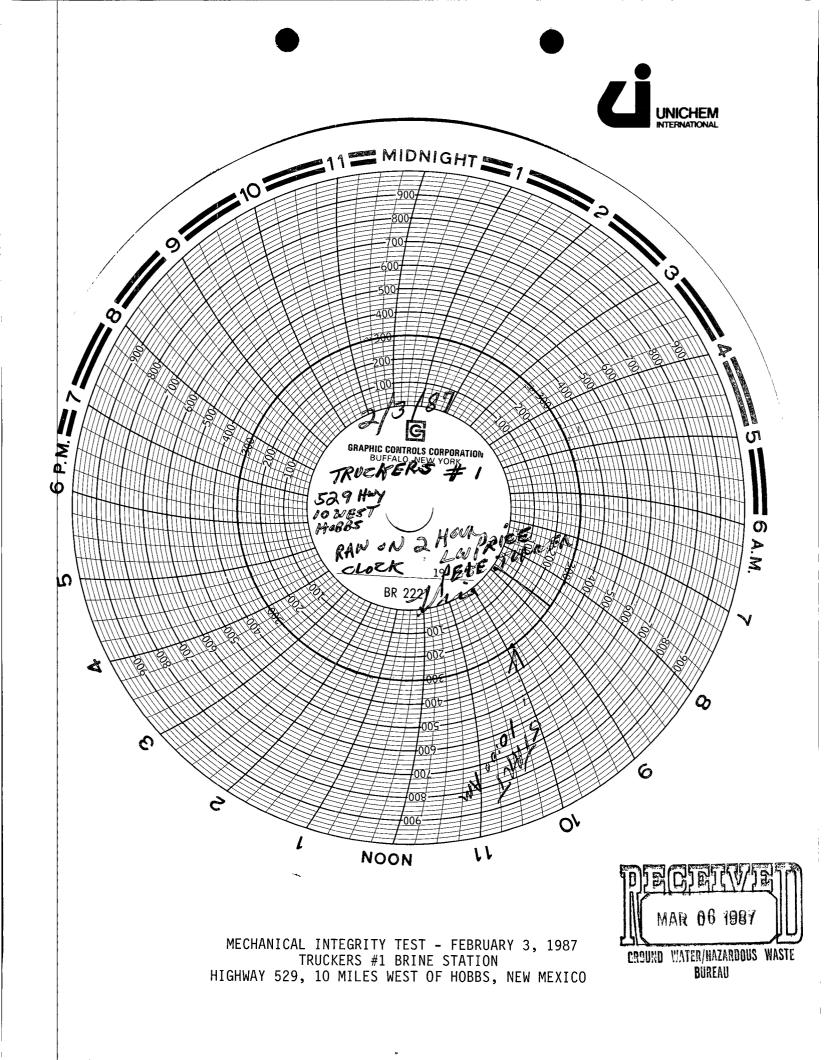
WP:mms

Enclosure

cc: Richard Brakey

UNICHEM INTERNATIONAL INC.





BRINE STATION INSPECTION FORM

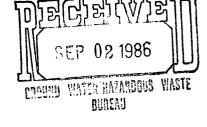
| | | Lankartk | V / / |
|---|------------------------|--|----------|
| DATE /2/10 1986 | EID INSPECTOR | Lambert, K Baker | 05Ch# 1 |
| FACILITY Unichem Truckers #1 | EID INSPECTOR LOCATION | le-/ | |
| FACILITY REP ON SITE None | COUNTY | LEA | |
| DP-370 | | | |
| WELL OPERATION 2 well syste | | | |
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| LEAKS AROUND WELL OR PUMP NOW & | | SURE | _PSIG |
| DEFINE THOUSE WELL ON TOTAL | | *************************************** | |
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| STORAGE AREA | | | |
| FOR PONDS: | | | |
| GENERAL LINER APPEARANCE | | | |
| AMOUNT OF FREEBOARD | | | |
| AMOUNT OF FREEBOARD ANY SIGN OF OVERFLOW OR LEAKS | | | |
| LEAK DETECTION SYSTEM FLUIDS | DRY | | |
| _ | | | |
| FOR TANKS: GENERAL APPEARANCE Good Shape LABLED PLAINLY X YES | 3 | 1 1 | . |
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| BERMED TO PREVENT RUNOFF X YES | ио | | |
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| PROPERLY GRADED AND BERMED TO CONT ANY EVIDENCE OF RECENT SPILLAGE | AIN SPILLAGE | X YES _ ▼ YES | NO X |
| DOES FACILITY HAVE A SPILL COLLECT | ION SYSTEM | X YES | NO |
| ANY EVIDENCE OF OIL SPILLING/DUMPI | ING | YES : | ▼ NO |
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| MONITORING WELLS | | | |
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| DEPTH FT STATIC WAT SAMPLED THIS VISIT YES 1 | TER LEVEL | _FT BELOW CA Ec | ASING |
| comments Not used today b | ut is operati | ONA | |
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| | | | |



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

August 28, 1986

Mr. Kevin A. Lambert, Hydrologist Ground Water & Hazardous Waste Bureau State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968



Dear Kevin,

During my recent visit with you in Santa Fe on August 8, 1986, we discussed Truckers #1 Brine Station. At that time, I indicated that we have temporarily shut down the well, due to economic conditions in southeastern New Mexico. However, we do not want this to impair our permit in any way. We would like to retain the ability to re-open the station once the economy responds favorably, or if work in the area necessitates temporary opening of the station.

ì,

With respect to the well's history, we experienced a slight problem on the east side of the well. Rain water would typically build up in this area, and, due to the adjacent brine tanks, the chlorides in the water would sometimes slightly exceed the levels for normal well water. For this reason, Paige Morgan requested that we install some sort of spill collector so that chlorides will not migrate into the soil.

We do not believe that this represents a real problem; however, when we do re-open the station, we will certainly comply with this request. We propose installing a small spill collection system with an underlying liner, with decanting to be performed on a regular basis. If the system is designed as shown on the previous submittal for Truckers #1, we really do not expect to have any water in this area. We will be upgrading the piping and also installing a new level control device, which should take care of this particular problem.

Mr. Kevin A. Lambert August 28, 1986 Page Two

If you have any questions or comments after reviewing this information, please contact me.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price Staff Engineer

WP:mms

cc: Jim Britton

Richard Brakey

| No. of | ` |
|---------------|----------------------|
| Samples | , Ion |
| | Na |
| | K |
| | Ca |
| | Mg |
| | C1 |
| | HCO3 |
| | C03 |
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| FIELD TRIP REPORT GROUND WATER SECTION | |
|---|---|
| SLD USER CODES County Lea | |
| Ground Water: 59300 NO ₃ , HC, & Toxics: 59600 UIC: 59500 | |
| Name of Facility: TRUCKERS# 1 Brine Station | |
| Location: RT529 near hobbs, NM | |
| Discharge Plan Number: DP- | |
| Type of Operation: Brim Station | |
| ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT | |
| EID Inspector(s): Saves/Bake(Date of Inspection or Visit: 6/17/86 Discharger's Representative Present During EID Visit: | |
| Discharger's Representative Present During EID Visit: | |
| Title or Position: | |
| Purpose of Visit: a. Evaluation of Proposed Discharge Plan | |
| b. Compliance Inspection of Discharge with Approved Planc. Other (specify) | _ |
| Inspection Activities During Field Visit: | - |
| a. Inspection of Facilities or Construction (specify) | |
| | |
| b. Sampling of Effluents (give sampling locations) | |
| | |
| | |
| c. Sampling of Ground Water (give names or locations of wells) | |
| c. Sampling of Ground Water (give names or locations of wells) | |
| c. Sampling of Ground Water (give names or locations of wells) | |
| c. Sampling of Ground Water (give names or locations of wells) d. Evaluation of geology, soils, water levels or other physical characteristics of the location (specify) | • |
| d. Evaluation of geology, soils, water levels or other physical | • |

Observations and Information Obtained during the Visit:

Area looked the Same as last time. Logding Area graded and berned. No evidence of 0:1 spillage Well is set up to pump brine out annulus. Frosh water linuis disconnected

ACTION REOUIRED



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

March 13, 1986

Paige Grant Morgan, Acting Program Manager State of New Mexico Environmental Improvement Division Ground Water Section P.O. Box 968 Santa Fe. New Mexico 87504-0968

Trucker's Brine Station No. 1

Dear Paige:

In response to your letter of March 3, 1986, it is our intention to act on your suggestion to submit a Part 5 discharge plan within six months of the date of your letter, or September 3, 1986. Further, we anticipate that we will make our first submittal by this summer.

With regard to the loading area to be scarified with concrete tailings, this is an economical means of rendering the present plastic soil condition that currently exists around the loading areas; and it is in lieu of placing a permanant concrete structure or driveway. However, many civil engineers use this method to "beef up" their subgrade. It also prevents mud pumping by changing the porosity of the soil, which, in turn, affects the permeability. This should enhance our discharge plan.

Paige, if you have any further questions, please let me know.

Regards,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

CROUPD LIATER BAZARDOUS WASTE

BUREAU

WP/sar

3/12/86: Wayne Price Thirchem called (393-7751) (1) They plan to sulemit a fact 5

De you Sucker's # 1 les September 3

at the latest; and (2) They will have the materials required on the Carlobad station in your ly March 18th or at least postmarked Warch 18. Note: wait for later Part 5 submitfals on Trucker's #1 before publishing public notice. Jake Morgan





TONEY ANAYA GOVERNOR

DENISE D. FORT DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968

March 3, 1986

Wayne Price, Staff Engineer Unichem International P.O. Box 1499 Hobbs, New Mexico 88240

Unichem's Trucker's Brine Station No. 1

Dear Wayne:

The plans you have submitted for upgrading the surface facilities at Trucker's No. 1 Brine Station appear to be generally adequate. I will consider these plans an amendment to your Part 3 discharge plan, unless you commit to submitting the balance of a Part 5 plan within a specified time period - say, within the next six months. My reason for this is that I am not inclined to have the proposed improvements at the Trucker's No. 1 facility delayed until the present permit is due to expire. If you agree to prepare the balance of a Part 5 permit within a specified time period, with implementation of the Part 5 plan to be carried out within a specified time period, then I will consider the plans you have submitted to be the first stage in preparing a Part 5 permit for the facility, and will publish public notice accordingly. Please respond quickly with your intentions in this regard.

I do have a question on the plans you have submitted: please explain your remark that the loading area will be scarified with concrete tailings.

With regard to your comment that many brine operators in your area do not have pits (presumably you mean emergency overflow pits) at their facilities: as you know, this agency assumed responsibility for regulating the brine extraction facilities in the state after many of these facilities were already in operation and permitted by the Oil Conservation Division. EID is attempting to work with the brine station operators on a reasonable time schedule to bring all of these facilities into compliance with the Water Quality Control Commission regulations. ₩ayne Price

Wayne Price Page 2 March 3, 1986

The ones which claim our attention first are those which show evidence of spillage and leakage at the facility which pose an immediate threat to ground water quality. Eventually, however, all brine facilities will be required to come up to the same standards.

Sincerely,

Paige Grant Morgan

Acting Program Manager

Ground Water Section

PGM/mp

cc: Garrison McCaslin, EID District IV Manager



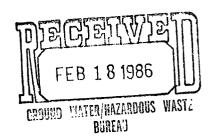


Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

February 14, 1986

Ms. Paige Grant Morgan State of New Mexico Environmental Improvement Division P.O. Box 968 Santa Fe, New Mexico 87504-0968

RE: Rowland Trucker's Brine Station No. 1 Hwy. 529: Sec. 1, Twp. 19S, Range 35E, Unit A



Dear Paige:

Per your request, we are enclosing the amendment to the Part 3 Discharge Plan entailing a properly designed spill collection system, for your approval.

Due to the depressed economy in this area and the limited use of this brine station, we would like to delay any major expenditures on this facility. Therefore, we would like to propose the following:

As our first option, we would not build the pit. Rather, we would install the proposed electrically operated brine safety shut-off valve which will prevent accidental overflow of brine from the existing tanks. This overflow is caused by the cavity pressure after the brine pump has been shut down. A safety shut-off valve has been installed at the Eunice facility with remarkable results, reducing our incidental spillage by 90%. In addition, we would routinely remove any surface water, whether brine or rainfall, from the area.

Paige, we have noticed that many of the brine operators in our area do not have pits at their facilities. For this reason, we feel that the option above is reasonable. Also, you may note that the enclosed amendment pertains to surface factors only. However, it is precisely these surface factors that contribute to our incidental spillage problem.

Of course, should our first option not be acceptable to you, then we would go ahead with our second option, which is to build the pit as shown on the enclosed amendment.

Also, we respectfully request that you accept the enclosed plan as our preliminary submittal for the 1987 permit under the Water Quality Control Commission regulations, meeting Parts 1 through 5, as applicable. Please realize that we will be dealing with lithology, hydrology and geology in future submittals.

UNICHEM INTERNATIONAL INC.

Letter to Paige Grant Morgan Re: Rowland's Truckers Brine Station No. 1 February 14, 1985 Page Two



I look forward to your comments on our above proposals.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price Staff Engineer

WP/sar Enclosures - noted

cc: Jim Britton Richard Brakey Charles Root



ATTACHMENTS

EXHIBIT A:

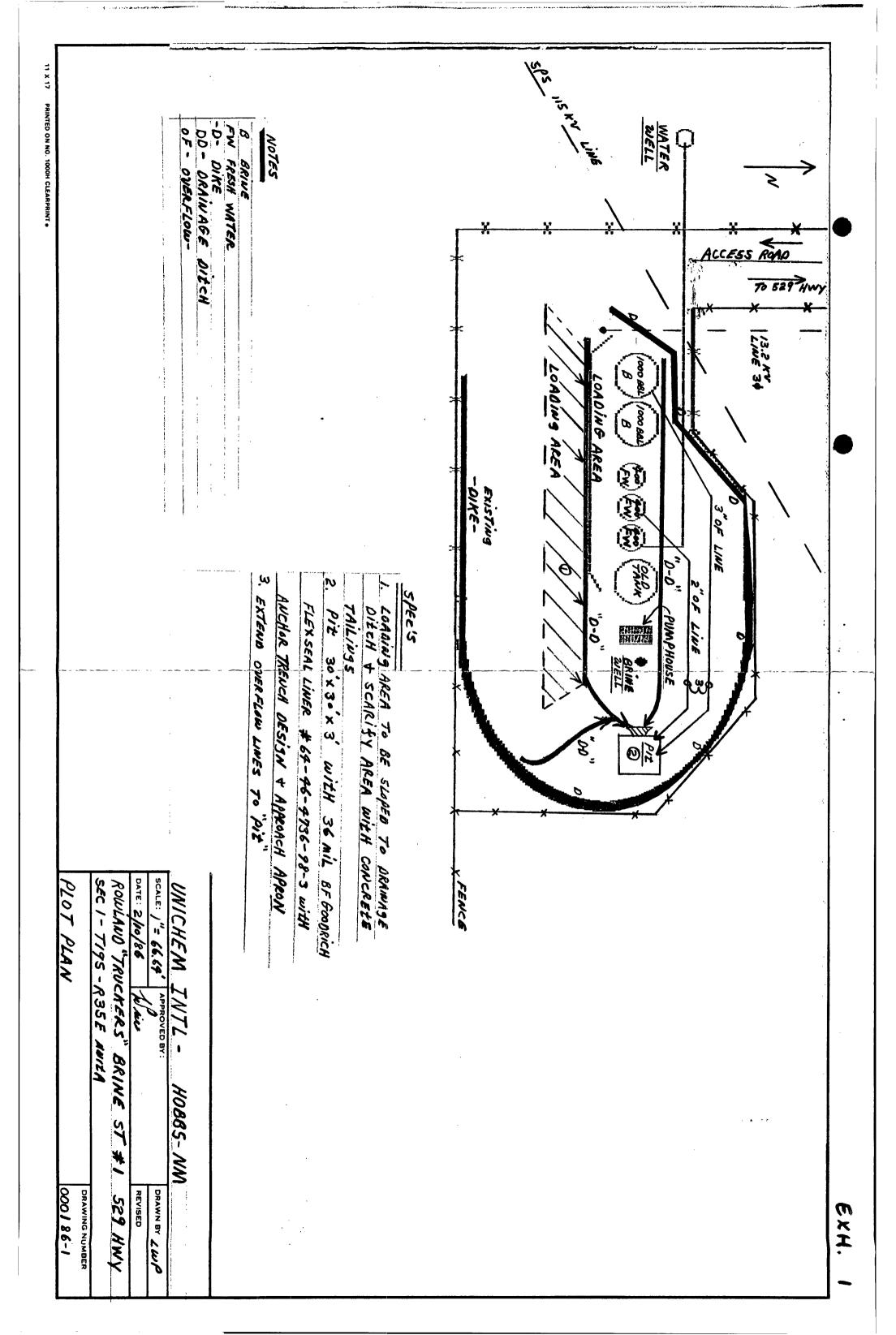
Proposed Plot Plan, Rowland Trucker's Brine Station #1, Hwy. 529

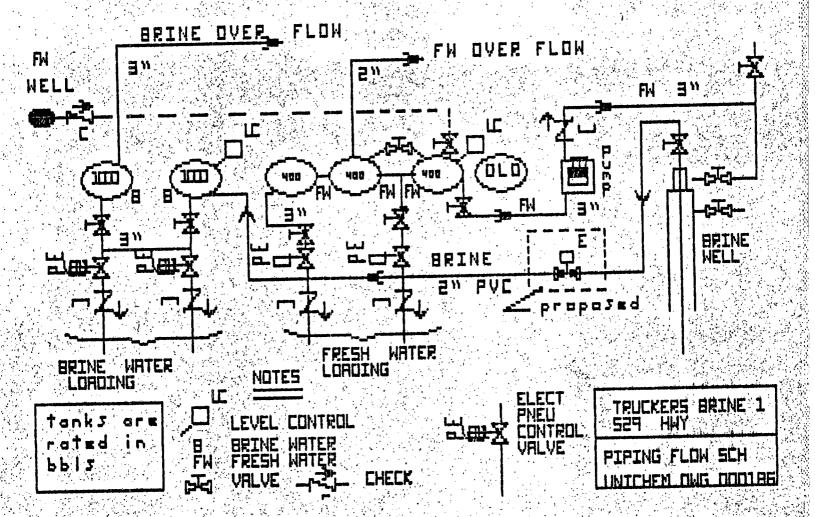
EXHIBIT B:

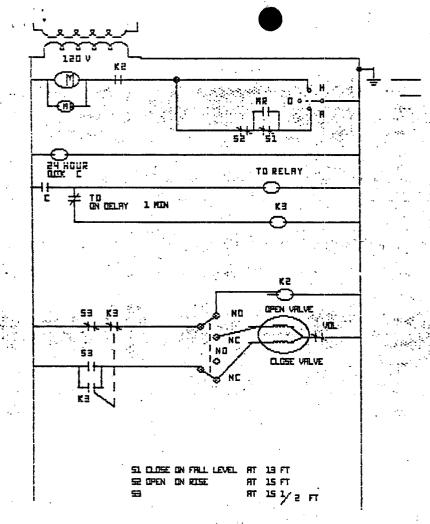
Piping Flow Schematic

EXHIBIT C:

Electrical Control for Electrically Operated Brine Shut-Off Valve







THUND OFF RUTO SH

RR RUX MOTOR RELRY

SI SE LEVEL CONTRCTS

SEY HOUR CLOCK

CLOCK MAKES IS MIN PER 24 H

TIME DELAY RELAY O TO 180-SEC

RE MOTOR INTERLOCK RELAY
PREVENTS MOTOR FROM RUN
IF VALVE IS CLOSED
HORCHESTER MOTOR VALVE

SEQUENCE OF OPERATION

OFF POSITION HAND POSITION AUTO POSITION MOTOR WILL NOT RUN BRINE VALVE WILL OFFRATE AS NORMAL

MOTOR WILL PUN IF ERINE VALVE IS OPEN ONLY
MOTOR WILL CYCLE OFF AND ON BY LEVEL CONTROL OF SI AND SE
MOTOR WILL SHUT DOWN IF BRINE VALVE CLOSES VIA KE RELAY
INTERLOCK

ONCE EVERY 24 HOURS CONTRCT C CLOSES FOR 15 MIN AND PICKS UP RELAY K3 VIA NC TO TIME DELAY RELAY K3 WILL STAY PICKED UP FOR OME MIN AND WILL EAUSE BRINE VALVE TO CLOSE VIA NO K3 CONTRCT A NC K3 CONTACT WILL OPEN AND ORDER OUT K2 MOTOR INTERLOCK CAUSING THE MOTOR TO SHUT DOWN IF BRINE IS ALREADY CLOSED NOTHING WILL HAPPEN

That the company president and the were very worried about the 1/27/86: letters & had sent on the Carlobad and Trucker's #1 facilities and wanted to do everything necessary To straighten things out.

Un Carlobad: Wayne wanted to know what more was expected. I pointed out that I had listed some specific elements of the investigation that would be required: Cocafrons and depths of soil doves, what would be analyzed for etc. We discussed further: he agreed to send me from Utah a sketch map of the facility, as accurate as he could make it, indicating localtons of three poil cores around * the tank and two for background. Soil samples to be analyzed for chloride, by A&L Soillabs, a Texas firm. Anthal death of cores to be deeper than and evident bine contamination if the bottom of any core still showled

elevated chloride, cores would be

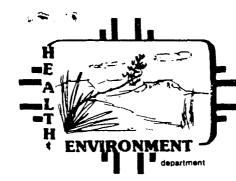
Haken to greafer depth. Wayne will

Kuss

have the soil lab send me an description of the fechnique used To collect the sample and to analyze if. He will submit all this within two weeks. He indicated that the groblems at The Carlobad facility are and poix months old - not clong-standing -Frucher's No1: Wayne said he had simply let if stide to get a De amendment in on this facility in Home. He asked to be reminded whether I was regulating a Gull Part 5 amendment ord just an amendment of the surface Gacilottes - X said the later. He I pard he would definitely get that in before the Feb. 17 deadline.

Large Morgan

DENISE D. FORT



STATE OF NEW MEXICO

DIRECTOR

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

January 17, 1986

R.J. Brakey, Vice-President Unichem International PO Box 1499 Hobbs, NM 88240

Re: Discharge plan amendment required at Unichem/Trucker's No. 1 Brine Station

Dear Mr. Brakey:

You were informed in a May 23, 1985 letter from EID staff member Paige Morgan that the surface facilities at your above-referenced brine station do not meet the terms of Part 3 of the New Mexico Water Quality Control Commission (WQCC) regulations, under which your discharge plan for that facility had been approved. You were therefore requested to "... submit an amendment to your Part 3 discharge plan entailing a properly designed spill collection system and lining of the spill collection pit." Unichem's staff engineer, Wayne Price, responded to Ms. Morgan's request by taking immediate steps to remove any sources of surface contamination at the site and agreeing to submit the required discharge plan materials on or before January 1, 1986. This date was agreed upon in a telephone conversation between Mr. Price and Ms. Morgan and noted in a letter from Morgan to Price of August 12, 1985.

To date, you have not complied voluntarily with the request to prepare a discharge plan amendment for the Trucker's No. 1 Brine Station. Therefore, pursuant to Section 3-109.E. of the WQCC regulations, you are hereby required to submit said discharge plan amendment by February 17, 1986, to avoid termination of your discharge plan for the Trucker's No. 1 Brine Station. Note that it is illegal to operate a brine extraction well and associated surface facilities in the state of New Mexico without an approved discharge plan

If you have any questions on the contents of this letter, please contact Paige Morgan at the above address or by telephone at \$27-2901.

Sincerely.

Ernest Rebuck, Chief

Ground Water/Hazardous Waste Bureau

ER:pgm

cc: Garrison McCaslin, Acting EID District IV Manager Wayne Price, Unichem Staff Engineer

EID BUCKSLIP

| CHECK ONE: X LETTER TO V.P. of Uniden ANY |
|--|
| for Bareau Ching's signature |
| /_/ MEMO TO |
| /_/ PRESS RELEASE |
| /_/ OTHER |
| SUBJECT: DP amendment required |
| DRAFTED BY: Pars Margan 1/10/86 |
| CONCURRENCES: |
| NAME: INITIAL REC'D APPROVED |
| . Han Comad Sect. Mgr. PC 1/17/86 11/7/86 |
| Ernest Rebuck Bur. Chief Ch 41/06 /20/06 |
| Richard Holland Dep. Dir. |
| Denise Fort |
| FINAL DECISION NEEDED BY 1/17/86 BECAUSE date of Cate) Letter; Deceles overdue on submitting the required IP amendment |
| Celfer, I weeks orderdue on Submitting the |
| required of amendment |
| COMMENTS BY DRAFTER OR REVIEWER(S): |
| These guys have 4 brie wells & there |
| have been moderate to severe problems |
| w/ 3 of them. I don't think we should |
| have been moderate to severe problems w/ 3 of them. I don't think we should let them slide on any deadline. |
| |



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

RECEIVED

October 9, 1985

OCT 1 0 1985

GROUND WATER/HAZARDOUS WASTE BUREAU

Paige Grant Morgan Water Resource Specialist State of New Mexico Environmental Improvement Division P.O. Box 968 Santa Fe, New Mexico 87504-0968

Dear Paige:

In response to your letter of October 2, we are currently accepting bids for both liner and dirt construction work on the Eunice brine facility.

On Trucker's No. 1 brine station, a level control device has been installed on the system, and all overflow pipes have been removed.

I will keep you advised of all further developments.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

WP/sar ~

DENISE D. FORT DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

October 2, 1985

Wayne Price, Staff Engineer Unichem International PO Box 1499 Hobbs, NM 88240

Dear Mr. Price:

This letter is just a brief reminder that our last communication regarding the discharge plan for Unichem's Eunice brine facility was my letter to you of August 9, 1985. I would like to resolve our negotiations regarding the contents of this plan as soon as possible. Please contact me if I can help to clarify the points of my August 9th letter, so that we can finalize the terms of the Eunice station discharge plan.

Also, with regard to my August 28th letter discussing your cleanup of the Trucker's No. I brine station: have you installed the necessary pressure release system at the wellhead there, in order to permit you to remove the remaining overflow pipes from two of the brine storage tanks?

I hope to hear from you soon.

Sincerely,

Paige Grant Morgan

Water Resource Specialist

PGM:pgm

cc: John Guinn, EID District IV Manager

Aucher 5 #1: ponds have been closed oil soil siled of il Gence Come on month whole. One line from well to als pand has been disco Two Chas one your 2nd from a end out from yth bank year w. end have toler Ask why mot . The stop what of years line, Voto: no stock tank in field n. of yacitike no wonderel. Trucker's water well appears Conted m. ne.

DENISE D. FORT DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

August 28, 1985

Wayne Price, Staff Engineer Unichem International PO Box 1499 Hobbs, NM 88240

Re: Trucker's No. 1 Brine Station.

Dear Mr. Price:

As I told you when we met at Unichem's Eunice brine station on August 22nd, Steve Sares and I visited the Trucker's No. I facility earlier that same day. We found that the cleanup of the surface facilities which you had carried out there was basically adequate as an interim measure prior to submitting an amendment to Unichem's Part 3 discharge plan for the Trucker's No. I station on or before January 1, 1986.

The one remaining problem with regard to the surface facilities at the Trucker's No. 1 site is that there are still overflow pipes leading from two of the tanks out to behind the loading area. You indicated that this could be corrected by fitting the wellhead with a pressure release system, such as the one you installed at the Eunice station as part of the upgrade package for that facility. I encourage you to make this improvement at the Trucker's No. 1 station also, to remove that potential source of brine spillage which the company would subsequently be required to clean up.

Thank you for your continued cooperation in bringing Unichem's brine stations in New Mexico into compliance with the state's Water Quality Control Commission regulations.

Sincerely,

Paige Grant Morgan

Water Resource Specialist

PGM:pgm

cc: John Guinn, EID District IV Manager.

| amples, Ion | |
|---|--|
| Na | FIELD TRIP REPORT |
| K | GROUND WATER SECTION |
| Ca | |
| Mg | SLD USER CODES County (ea- |
| C1 | Ground Water: 59300 |
| HCO3 | NO ₃ , HC, & Toxics: 59600 |
| C03 | UIC: 59500 |
| S04 | FACILITY VISITED 7/25/1 |
| TDS | Name of Facility: Trucker of the States |
| ////////////////////////////////////// | Name of Facility: Trucker's #1 Brine Stafton - Truckers Location: Just west of inter-section of Horn 529 with Hooks - Carlobard Hung on Horn 529 Discharge Plan Number: DP-370 |
| NO3+ NO2 | Discharge Plan Numbers DR 3 CO |
| NH3 | Discharge Plan Number: DP- 370 |
| kjeld N | Type of Operation: brine mfg. + sales. |
| ////////////////////////////////////// | ENGINONMENTAL IMPROVEMENT DIVICION FIGUR VICIT |
| Ba | ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT EID Inspector(s): July Morgan - Steve Saves |
| Cd | Para of Tanastian on Visite \$100 /ca |
| CN | Date of Inspection or Visit: 8/22/85 Discharger's Representative Present During EID Visit: NONE |
| Cr | |
| F | Name: Title or Position: |
| Pb | Purpose of Visit: |
| Hg | a. Evaluation of Proposed Discharge Plan |
| Se | b. Compliance Inspection of Discharge with Approved Plan |
| Ag | c. Other (specify) |
| U V | Inspection Activities During Field Visit: |
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| Ra 226 | as inspection of facilities of construction (specify) (so then reported they have closed the old oil- confaminated ponds a Chermed around the facility |
| Ra 228 | (1) the de is a Description of the factlite |
| 7////////////////////////////////////// | Confunctional polices |
| Cu | b. Sampling of Effluents (give sampling locations) |
| Fe | |
| Mn | |
| Phenols | • |
| Zn | c. Sampling of Ground Water (give names or locations of wells) |
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| В | |
| Со | d. Evaluation of geology, soils, water levels or other physical |
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| pH | |
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| | Avid they would be removed. |
| | ACTION DECUIDED |

ACTION REQUIRED

TONEY ANAYA GOVERNOR

DENISE D. FORT DIRECTOR

P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

August 12, 1985

Wayne Price, Staff Engineer Unichem International PO Box 1499 Hobbs, NM 88240

Dear Tr. Price:

In your letter of July 31, 1985, you requested that Unichem be allowed to delay designing a spill collection system and lining the existing spill collection pit at the "Trucker's "Yater Company Brine Station #1". I responded to you by telephone that if you wished to delay doing a full redesign of the spill collection system and wanted to commit only to removing spilled fluids from the pit on an interim basis, it would be necessary for you first to remove the salt- and oil-contaminated dirt in and around the pit, so that EID can monitor by occasional visual inspections whether contaminant spills have recurred.

On August 12, 1985, you reported to me that Unichem had cleaned the contaminated soil out of the pit, removing all soil down to uncontaminated caliche. In addition, you reported that the pipes that led from the tanks to the pit have been removed and a berm constructed around the facility to contain any spillage.

Thank you for your prompt attention to removing the sources of surface contamination at this facility. I will visit the site on August 22nd to see the interim steps you have taken to achieve compliance with the Water Quality Control Commission regulations. At that time, I will also attempt to collect a sample of the water from the windmill well immediately east of the Trucker's #1 brine station, for analysis for major ions, total dissolved solids (TDS), chloride and benzene. This information should contribute to an assessment of whether operations at Trucker's #1 brine station have caused any local ground water contamination.

You will be expected to abide by the commitments made in your July 31st letter. which we discussed briefly by phone: to pump out any contaminant spills contained in the pit within 48 hours of a spill; and, on or before January 1, 1986, to submit an amendment to your Part 3 discharge plan entailing a properly designed spill collection system.

Please be aware that your agreement to carry out the above steps does not relieve you of liability should your operation cause pollution of surface or ground waters.

Sincerely,

Paige Grant Morgan Water Resource Specialist

PGM:pgm

cc: John Guinn, EID District IV Manager



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

July 31, 1985

RECEIVED

AUG FING

OUND WATER, HAT ARDUM WASYR

Bung

TO:

State of New Mexico

Environmental Improvement Division

P.O. Box 968

Santa Fe, New Mexico 87504-0968

·

ATTN:

Paige Grant Morgan

Water Resource Specialist

Ground Water Section

SUBJECT: Truckers Water Company Brine Station No. 1 (529)

After receiving your letter of May 23, 1985, I spent many hours reviewing the system; and I have found that most of the water accumulated east of the brine station was due to rainfall. I did find a leaking valve involved that has been repaired. The old pit to the north appears to have two emergency lines; one from the fresh water side, and the other from the brine side.

With your permission, we would like to delay submitting an amendment for Part 3 of the WQCC regulations requiring a designed spill collection system and lining of that system.

In lieu of that, we will decant all accumulated spills on a timely basis and begin our layout design of the system for the renewal approved per your new regulations. Our first submittal for this site will probably be on or near January 1, 1986.

We would greatly appreciate your patience in this matter. Please indicate if this will be in compliance with your interim requirements.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price

Staff Engineer

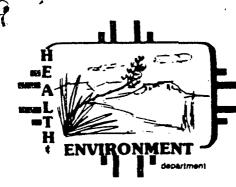
WP/sar

cc: Richard Brakey

Charles Root Jim Britton

UNICHEM INTERNATIONAL INC.

DENISE D. FORT



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Bex 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

May 23, 1985

R. J. Brakey, Vice-President Unichem International P.O. Box 1499 Hobbs, NM 88240

Re: Unpermitted discharges at Unichem's "Trucker's Water Co. Brine Station #1"

Dear Mr. Brakey:

While in the area on other business, EID staff have twice stopped at your abovenamed brine facility in T19S R35E Section 1, about a quarter-mile from the
intersection of Hwy. 62-180 and Hwy 529. The purpose of the visits, on May 14, 1985
and March 28, 1985, was to observe the condition of the surface facilities. On both
occasions, there was evidence of spillage or intentional disposal of oil and brine in
the unlined pit adjacent to the tanks. The facility is situated on a topographic rise,
with stock ponds in the depression between the brine facility and the highway; thus
the opportunity for contamination of shallow ground water appears to be
excellent. Depending on the volume of brine and oil that have been
spilled/disposed of in the pit for the two decades or more that this brine station is
reported to have been in existence, contamination may or may not have already
occurred.

The discharge plan for this facility was approved by the Oil Conservation Division under Part 3 of the Water Quality Control Commission regulations two days prior to Part 5 (the portion specific to injection wells) taking effect. When the EID subsequently received the authority for regulating brine extraction wells, we wrote to inform you that you would be required to operate your facility in compliance with Part 3 of the WQCC regulations until your present discharge plan approval expired (at which time you will be required to meet the terms of Part 5 as well as Part 3, if you wish to continue operations). The use of the unlined pit at your Trucker's #1 Brine Station does not meet the terms of Part 3 of the regulations. Therefore, please submit an amendment to your Part 3 discharge plan entailing a properly designed spill collection system and lining of the spill collection pit. If the pit is intended to hold fluids for more than 10 percent of the time, a leak detection system will also be required.

Unpermitted Discharges at Unichem's Page 2 May 23, 1985

This request constitutes an attempt to obtain your voluntary compliance with the WQCC regulations. If you have any questions, please contact me at the address and telephone number which appears on the letterhead, extension 206.

Sincerely,

Paige Grant Morgan

Water Resource Specialist III

GW/HWB

PGM:dlr

cc: John Guinn, Manager, EID District IV

Frank Margan



STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING

December 18, 1982

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87501 (505) 827-2434

Unichem International P.O. Box 1499 Hobbs, NM 88240

RE: GWB-9

Discharge Plan

Gentlemen:

The discharge plan submitted for the brine production facility and in situ extraction well located in Section 1, Township 19 South, Range 35 East, NMPM, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission regulations. It is approved pursuant to Section 109. Please note subsections 3-109E. and 3-109.F which provide for possible future amendment of the plan. Please also be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Yours very truly,

JOE D. RAMEY

Director

JDR/OS/dp

cc: Hobbs District Office



BSW# 12

Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

September 20, 1982

IL CONSERVATION DIVISION

DEC

9 1982

RECEIVED

Mr. Joe Ramey Energy and Minerals Department Oil Conservation Division

RE: Brine Well Discharge Plan

Truckers Water Co. Brine Well #1

Sec. 1 - T19S - R35E Unit A

Dear Sir:

Attached herewith, please find schematic diagrams of our brine producing facility in the captioned location. The diagram of the brine well itself, is self explanitory. The storage facility and its operation is somewhat different, in that we have two fresh water supply wells. The #1 well was drilled for as supply well in the early 1960's and has been in use since then. During periods of high demand, it frequently sanded up and an additional standby well was drilled. We currently use the #2 well as a fresh water supply to produce brine only. The #1 well is used as a standby well and for fresh water sales. The tanks are all above ground, and are monitored daily for leaks and sales.

Pressures are also monitored regularly on the brine well to determine any downhole malfunctions and assure brine quality. During the years 1980-81, 700,000 barrels of brine was produced at this facility.

We trust this meets your requirement for a suitable discharge plan, and meets with your approval.

Very truly yours,

Unichem International Inc. Truckers Water Co. Division

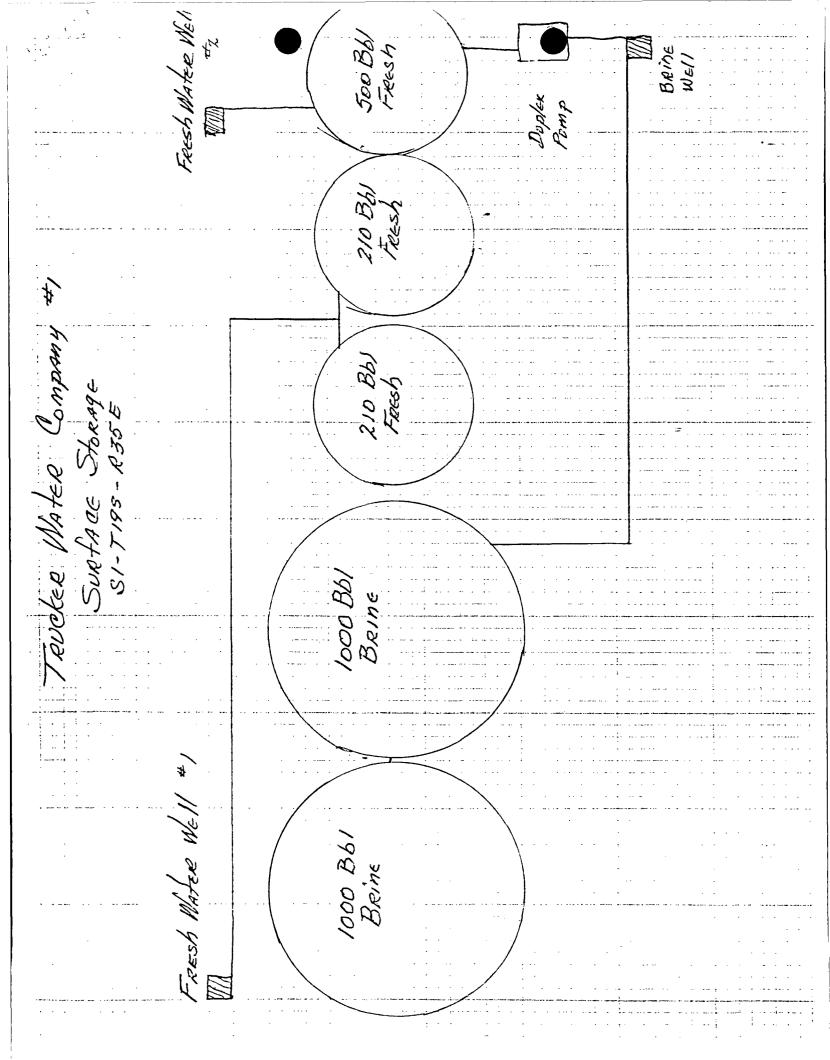
R. J. Brakey

Vice President

RJB/js

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY 103°30′ 32°45′ 3623 -:0 \Box 3622 3621 3620 T 1d S BM_.3828 3618 RUCKERS BRINE WERE 3616 3615 3614 "E A R L llarQ aloH 3608 3607

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UNICHEM INTERNATIONAL

601 NOTH LEECH

P.O.EOX1499

HOBBS. NEW MEXICO 88240

COMPANY: ROWLAND TRUCKING

ATE: 3-26-82

TELD, LEASEEWELL: TRUCKERS #1 ERINE

AMPLING POINT: SALT WATER WELL

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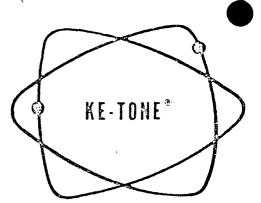
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TELEPHONE: HOBBS 393-7751

AREA CODE - 505

CHEMICAL CORPORATION

OF NEW MEXICO

601 NORTH LEECH

P. O. BOX 1499

HOBBS, NEW MEXICO 88240

Company ... Rowland Trucking

Field West Hobbs Station

Lease Truckers

Type of Somple Fresh Water

WATER ANALYSIS

| IONIC FORM | me/l * | mg/l * |
|--|--|--|
| Calcium (Ca++) | 3.36 | 67 |
| Magnesium (Ma++) | | 12 |
| Sodium (No+) (CALCULATED) | 1.58 | 36 |
| iron (Total) | | |
| | | |
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| Hydroxide (OH-) | Not. | Found |
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| Chloride (C1 -) | _1.13 | 40 |
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- * mg/l = milligrams per Liter
- me/l = milliequivalents per Liter

 $CaCO_3$ Scaling Index slightly positive @ $86^{\circ}F(0.52)$

CaSO_△ Scaling Index negative

\$50,000.00 BLANKET PLUGGING BOND

| BOND NO. | 4446488 | |
|----------|----------------------------|--|
| | (For Use of Smety Company) | |

(Note: File with Oil Conservation Commission, P. O. Box 2088, Santa Fe 87501)

KNOW ALL MEN BY THESE PRESENTS:

| (a corporation organized in the State of <u>New Mexico</u> | . (水流域浓热效) (a partnership), with its principal office in the city of, and authorized to do business in |
|--|--|
| the State of New Mexico), as PRINCIPAL, and HARTFORD ACCIDENT corporation organized and existing under the laws of the State of | & INDEMNITY |
| to do business in the State of New Mexico. as SURETY, are held firmly bour and benefit of the Oil Conservation Commission of New Mexico pursuant | I unto the State of New Mexico, for the use |
| Annotated, 1953 Compilation, as amended, in the sum of Fifty Thousand Dol States, for the payment of which, well and truly to be made, said PRINCIPAL successors and assigns, jointly and severally, firmly by these presents. | ars(\$50,000.00) lawful money of the United |

The conditions of this obligation are such that:

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases with the State of New Mexico; and

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO_2) gas leases, or helium gas leases on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals; and

WHEREAS, The above principal, individually, or in association with one or more other parties, has commenced or may commence the drilling of wells to prospect for and produce oil or gas, or carbon dioxide (CO₂) gas or belium gas, or does own or may acquire, own or operate such wells, or such wells started by others on land embraced in said State oil and gas leases, or carbon dioxide (CO₂) gas leases, or belium gas leases, and on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals, the identification and location of said wells being expressly waived by both principal and surety hereto.

NOW, THEREFORE, If the above bounden principal and surety or either of them or their successors or assigns, or any of them, shall plug all of said wells when dry or when abandoned in accordance with the rules, regulations, and orders of the Oil Conservation Commission of New Mexico in such way as to confine the oil, gas, and water in the strata in which they are found, and to prevent them from escaping into other strata;

THEN, THEREFORE, This obligation shall be null and void; otherwise and in default of complete compliance with any and all of said obligations, the same shall remain in full force and effect.

PROVIDED, HOWLVER, That thirty (30) days after receipt by the Oil Conservation Commission of New Mexico of written notice of cancellation from the surety, the obligation of the surety hereunder shall terminate as to property or wells acquired, dolled, or started after said thirty (30) day period but shall continue in effect, notwithstanding said notice, as to property or wells theretofore acquired, dolled, or started.

+247+245+245 + + 34 + 34 + 36 31/+32++++ + 7 + 4 7 + 8 -10+14+12

2,1

ection 26 Township 18 South Range 35 East

L-6868 (E) L-6869 (E) NW¼SE¼SW¼ NW¼SW¼ 26-18-35 26-18-35

Section 27 Township 18 South Range 35 East

L-3783 2310 ft. from South & West Lines OWD L-3963 $NW\frac{1}{4}NE\frac{1}{4}$ OWD

Section 34 Twp. 18 S., Rge. 35 E.

L-7129 $SE_4^1SW_4^1S$ Stock Shallow

Section 35 Township 18 South Range 35 East L-3678 OWD

Section 36 Township 18 S. Range 35 E.

L-6313 NEZNEZ Comm.

Section 29

Township 18 South Range 36 East

L-1551

denied Power Gemer.

Section 30

Township 18 South Range 36 East

L-1552

L-5200-X-5

denied Ind. Approximate Center

Ind.

L-6641(E)

SEZNEZNWZ

OWD

Section 31 Township 18 South Range 36 East

L-1553

L-4892 (Withdrawn)

 $SW_{\frac{1}{4}}SW_{\frac{1}{4}}SW_{\frac{1}{4}}$

Ind.

Comm.

| Section 1 | Township 19 South | Range 35 East |
|------------|--|---------------|
| L-2359 | $SW_{\frac{1}{4}}SW_{\frac{1}{4}}NW_{\frac{1}{4}}$ | Dom. |
| L-3945 | $SW_{\frac{1}{4}}NE_{\frac{1}{4}}^{\frac{1}{4}}NE_{\frac{1}{4}}^{\frac{1}{4}}$ | OWD |
| L-3945 (2) | $SW_{4}^{1}NE_{4}^{1}NE_{4}^{1}$ | OWD |
| L-5434 | SW4NE4NE4 | Ind. |
| L-6180 | recreational | |
| L-5434-S | SE4NW4NE4 | COM. |
| L-8582) | SE#SE# | IND |
| L-8583)\\ | SELNEL | IND |

| Section 2 | Township 19 South | Range 35 East |
|-----------|-------------------|---------------|
| L-5764 | SE 4 SE 4 NE 4 | WF |
| L-5764-X | NE 4 NE 4 NE 4 | WF |

| Section 13 | Township 19 South | Range 35 East |
|------------|------------------------------|---------------|
| L-1756 | | Irr. |
| L-4563 | $NE\frac{1}{4}SE\frac{1}{4}$ | Irr. |

Section 14 Township 19 South Range 35 East L-6801 N½S½ Stock

| _ | | | | _ |
|-----|-----|-----|----|----|
| Sec | ~ t | 1 1 | nn | -5 |
| | | | | |

Township 19 South

Range 36 East

| L-2720 | NW_{4}^{1} | Ind. |
|------------|---------------------------------|-----------------|
| L-4192-X-2 | $NE\frac{\hat{1}}{4}$ | Comm. |
| L-6050 | $N_{2}^{1}NW_{4}^{1}NW_{4}^{1}$ | Com. Oper. Dom. |
| L-6853 | $NE^{\frac{1}{4}}$ | Dom. |
| L-7431-S | NEINEI | IRR & COM |

| Section 6 | Township 19 South | Range 36 East |
|-----------|-------------------|---------------|
| L-2889 | SE¼SE¼ | OWD |
| L-2720 | NW 4 | Ind. |
| L-2329 | | OWD |
| L-2718 | $NE\frac{1}{4}$ | Ind: |
| L-2719 | $NE \frac{1}{4}$ | Ind. |
| L-2720 | $NE\frac{1}{4}$ | Ind. |
| L-2721 | $NE\frac{1}{4}$ | Ind. |

| Section 8 | Township | 19 | South | Range | 36 | East |
|-----------|----------|----|-------|-------|-----|------|
| L-2328 | | | | (| OWD | |

| Section 18 | | Township 19 South | Range 36 East |
|------------|--------|------------------------|-----------------|
| L-2928 | closed | $SW_{4}^{1}SE_{4}^{1}$ | Refinery Opera. |
| L-7431 | | NE¼NE¼SE¼ | Irr. |



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

September 20, 1982

Mr. Joe Ramey Energy and Minerals Department Oil Conservation Division **⊖**∧i

RE: Brine Well Discharge Plan
Truckers Water Co. Brine Well #1
Sec. 1 - T19S - R35E Unit A

Dear Sir:

Attached herewith, please find schematic diagrams of our brine producing facility in the captioned location. The diagram of the brine well itself, is self explanitory. The storage facility and its operation is somewhat different, in that we have two fresh water supply wells. The #1 well was drilled for as supply well in the early 1960's and has been in use since then. During periods of high demand, it frequently sanded up and an additional standby well was drilled. We currently use the #2 well as a fresh water supply to produce brine only. The #1 well is used as a standby well and for fresh water sales. The tanks are all above ground, and are monitored daily for leaks and sales.

Pressures are also monitored regularly on the brine well to determine any downhole malfunctions and assure brine quality. During the years 1980-81, 700,000 barrels of brine was produced at this facility.

We trust this meets your requirement for a suitable discharge plan, and meets with your approval.

Very truly yours,

Unichem International Inc. Truckers Water Co. Division

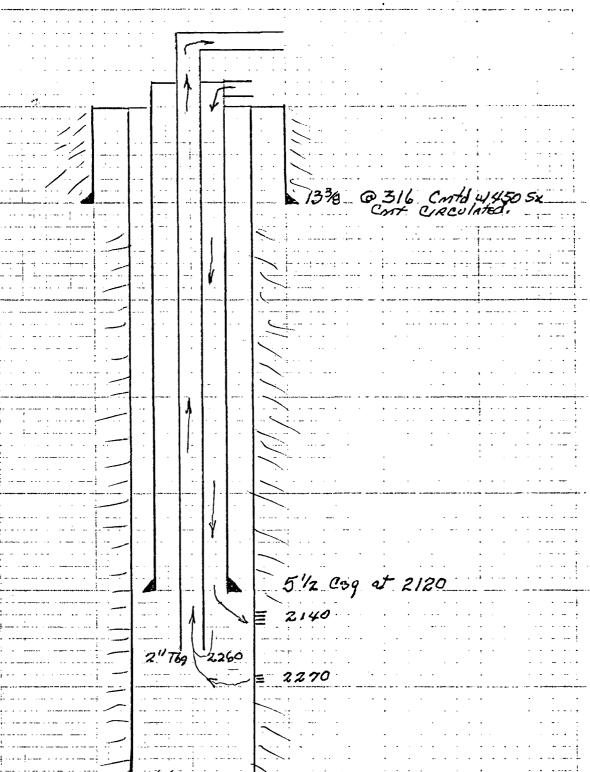
R. J. Brakey

Vice President

RJB/js

Justice + 1

Un Chem International
Truckers Water Co #1 Brine Well #1
Unit A 51-T195-R35E



11/1/5/11/11/11 3000 PBD

958 Cog at 4275 Conto 4 2700 5x

DSW#12



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

September 20, 1982

Mr. Joe Ramey Energy and Minerals Department Oil Conservation Division SEP 21 1982

OIL CONSERVATION DIVISION SANTA FE

RE: Brine Well Discharge Plan

Truckers Water Co. Brine Well #1 Sec. 1 - T19S - R35E Unit A

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Very truly yours,

Unichem International Inc. Truckers Water Co. Division

R. J. Brakey

Vice President

RJB/js



Vaichem Truckers #1 DP-370 Dec 1988 Shut-in Wellhead



Vnichem Truekers #1 DP-370 Dec. 1988
Tankage



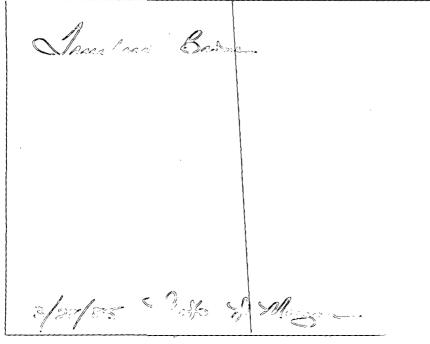
Unichem Truckers #1 Pump house



Trackers Bodes. Forder class for of Anima polish in -Carled on Alight nices. Shallows i. Pfock? pinde in Pireles.

Safer Sale S. Merca.







Thomba Bons frai fran X of 809 = 60.180 3/20/ 1 / Silver



Janeter's = Brown 5th. (Unidon)

(1) 22/85

Jahoter S. 2000



Shuchen's # Brim Str. (Vnichem)
8/22/85
philps: S. Sam



Amelia's = 1 Brown Str. (Unsdown) 8/22/85 photo: 5. Souro



"Truckers Water" W. of Hobbs
5/14/84

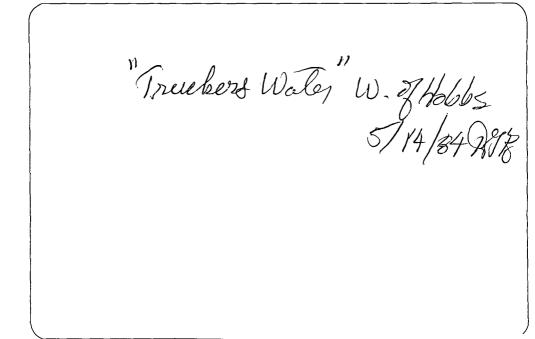


"Truckers Water" W. of Hobbs 5/14/84 Desk

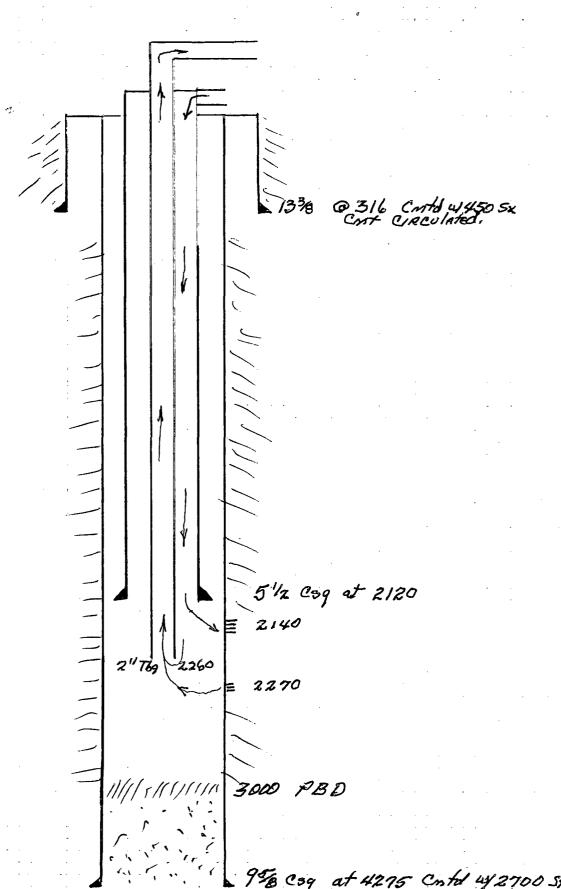


"Trucker's Water" Spillage pit. West of Hobbs 5/14/84





UnitA SI-T195-R35E



TRUCKER MATER COMPANY #1

FRESH Water Well #1 1000 B61 BRIME 1000 861 BRINE Surface Storage 210 Bbj Fæsh 210 Bb/ FRESH WATER WEll Duplex Pomp **M** #2 500 Bb/ BRITE WEII

DP-370

TRUCKERS #1 BRINE STATION

Discharge Plan Permit Submittal #2 September 22, 1987





TRUCKERS #1 BRINE STATION

DISCHARGE PLAN PERMIT SUBMITTAL #2

SEP 23 1997

GROUND WATER/HAZARDOUS WASTE BUREAU

Presented to:

STATE OF NEW MEXICO

Environmental Improvement Division

UNICHEM INTERNATIONAL INC. P.O. BOX 1499 HOBBS, NEW MEXICO 88240

Prepared by:

Wayne Price, Staff Engineer



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

September 22, 1987

VIA CERTIFIED MAIL: P 241 450 298

Mr. Kevin Lambert, Hydrologist Ground Water & Hazardous Waste Bureau State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968

SUBJECT:

Truckers #1 Brine Station - Hobbs, New Mexico Discharge Plan Submittal #2

Dear Kevin:

From our telephone conversation of 25 August 1987, it is my understanding that the existing permit (DP-370) for Truckers #1 was accepted and approved by the Oil Conservation Division, meeting Part III of the Water Quality Control Commission requirements. Please accept the information contained herein as our completion of Part V requirements, submitted for renewal of the existing discharge permit.

Additionally, please note that Exhibit #1 of the accompanying report represents the original Discharge Plan dated September 20, 1982, which was submitted to Mr. Joe Ramey of the Energy and Minerals Department of the Oil Conservation Division. This submittal for Truckers #1 Brine Station, located approximately 10 miles west of Hobbs, New Mexico, on Highway 529 (Sec. 1-T19S-R35E) is provided for your information.

During our discussion on the 25th, you indicated that your primary concerns with a re-permit situation such as this include the following general items pertaining to Part V of the Water Quality Control Commission regulations:

- --Plugging and Abandonment (Surety Bond);
- -- Mechanical Integrity;
- --Monitoring and Reporting Requirements; and
- --Discharge Plan Signatory Requirements

Mr. Kevin Lambert Page Two September 22, 1987

Each of these items will be addressed in detail in the accompanying report and supplemental exhibits. Also contained within this submittal is an upgrade plan to enhance our discharge plan. The following upgrade items are included:

- (1) Installation of two concrete loading pads as shown on the plot plan in Exhibit #2. This work is presently under way, and completion is estimated by 30 September 1987. Upon completion of the work, verification will be provided to the EID.
- (2) Installation of an auto-brine valve system as detailed on the piping schematic in Exhibit #3. It is anticipated that this system will be completed by 1 December 1987; again, pending completion, verification will be sent to the EID.
- (3) General clean-up and removal of all old piping, tanks, etc. This work is complete as of 8 September 1987.
- (4) As of 8 September 1987, the dirt berm height on the east end has been increased by two feet.

Unichem International requests that this upgrade plan be accepted as representing our completion of the Part III requirements, and that the information contained herein be accepted as our completion of Part V requirements.

In order to stay in compliance and be fully permitted by 31 December 1987, we are requesting that a public notice be issued upon receipt of this document--Unichem will provide subsequent verification in the interim period on a timely basis.

If you have any questions about the accompanying information, please do not hesitate to contact me.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wagne Price

Wayne Price

Staff Engineer

LWP:mms

Enclosure

TABLE OF CONTENTS

- I. Part V Questions and Answers--RE: Truckers #1 Brine Station
- II. Exhibits
 - #1: 1982 Discharge Plan Submittal (Joe Ramey, OCD)
 - #2: Plot Plan
 - #3: Surface Piping Schematic
 - #4: Mechanical Integrity Test
 - **#5:** Injection Fluid Analysis
 - #6: Blanket Plugging Bond/Surety Bond
 - #7: Maps Showing Area of Review
 - #8: Water Wells Within Area of Review
 - #9: Tabulation of Well History Data--Wells Within Area of Review
 - 1 Unichem International Inc., Truckers #1
 - 2 Amoco Production Company, State "NO" (Well #1)
 - #10: Injection Volume Summary
 - #11: Discharge Plan Signatory Requirement

PART V QUESTIONS AND ANSWERS

Truckers #1 Brine Station Submittal #2 - September 22, 1987

The following information is submitted for review in response to Part 5, <u>Water Quality Control--Underground Injection Control</u>:

5-100 REGULATIONS FOR EFFLUENT DISPOSAL AND IN SITU EXTRACTION WELLS:

Noted for in situ extraction wells.

- 5-101 DISCHARGE PLAN AND OTHER REQUIREMENTS:
 - A. Noted for in situ extraction wells.
 - B. (1) Noted for in situ extraction wells.
 - (2) Noted for in situ extraction wells.
 - (3) Noted for in situ extraction wells.
 - C. (1) Not applicable.
 - (2) If deemed necessary by the Environmental Improvement Division, Unichem International will utilize state of the art techniques in compliance with recommendations from the EID in order to restore any ground water damage caused by its operation under this discharge plan.
 - D. Not applicable.
 - E. Noted for in situ extraction wells.
 - F. Not applicable.
 - G. Noted for in situ extraction wells.
 - H. The Discharge Plan Signatory Requirement is set forth in Exhibit #11.
 - I. Not applicable.
 - J. Noted for in situ extraction wells.
- 5-102 PRE-CONSTRUCTION REQUIREMENTS:

Not applicable for permit renewal. Please refer to Exhibit #1 for a copy of the existing permit and documentation that is on file.

5-103 DESIGNATED AQUIFERS:

Not applicable.

Truckers #1 Brine Station

5-104 WAIVER OF REQUIREMENT BY DIRECTOR:

Not applicable.

5-105 AUTHORITY:

Noted for in situ extraction wells.

5-200 TECHNICAL CRITERIA AND PERFORMANCE STANDARDS FOR EFFLUENT DISPOSAL WELLS AND IN SITU EXTRACTION WELLS:

Noted for in situ extraction wells.

5-201 PURPOSE:

Noted for in situ extraction wells.

5-202 AREA OF REVIEW:

The area of review for this brine station has been determined as a 1/4-mile radius area from the wellhead. More detailed information will be provided in response to Section 5-210.B.

5-203 CORRECTIVE ACTION:

- At the present time there is one known well penetrating the injection zone in the area of review. This well has been reviewed and is listed in Sections 5-210.2 and 5-210.3. According to the public records located on file at the Oil Conservation Division in Hobbs, New Mexico, the well has been reviewed and requires no corrective action.
- B. Noted for in situ extraction wells.
- C. (1) Noted for in situ extraction wells.
 - (2) Noted for in situ extraction wells.
 - (3) Noted for in situ extraction wells.
 - (4) Noted for in situ extraction wells.
 - (5) Noted for in situ extraction wells.
 - (6) Noted for in situ extraction wells.
 - (7) Noted for in situ extraction wells.
- D. Noted for in situ extraction wells.

Truckers #1 Brine Station

5-204 MECHANICAL INTEGRITY:

For a response to items A through D, please refer to the most recent mechanical integrity test performed, as shown in Exhibit #4.

5-205 CONSTRUCTION REQUIREMENTS:

All of the requirements set forth in this section have been included in the original OCD submittal contained in Exhibit #1.

5-206 OPERATING REQUIREMENTS:

- A. (1) A maximum pressure of 300 psig at the wellhead has been used without any adverse effect on the formation.
 - (2) This statement has been duly noted and compliance is herein agreed to.
- B. Not applicable.
- C. (1) This statement has been duly noted and compliance is herein agreed to.
 - (2) This statement has been duly noted and compliance is herein agreed to.

5-207 MONITORING REQUIREMENTS:

- A. Requirement noted and complied with. Please refer to the mechanical integrity test in Exhibit #4.
- B. Not applicable.
- C. (1) This requirement is agreed to--please refer to Exhibit #5 for the most recently performed analysis of the injected fluid.
 - (2a) Items i and ii: Fluid volumes (fresh and brine) are metered and recorded daily by an automated electronic key system.
 - (2b) Items i and ii: Not applicable.
 - (2c) Unichem is aware of this requirement and agrees to comply as deemed necessary by the EID.
 - (3) Not applicable.

5-208 REPORTING REQUIREMENTS:

A. Not applicable.

Truckers #1 Brine Station

- B. (1) Unichem International agrees to notify the New Mexico EID in the event of any leachate excursion and will provide subsequent reports necessary to explain any potential problem.
 - (2a) This statement has been duly noted and compliance is agreed to.
 - (2b) This statement has been duly noted and compliance is agreed to.
 - (3) Not applicable.
- C. (1 & 2) Requirement noted and complied with. Please refer to Exhibit #11.

5-209 PLUGGING AND ABANDONMENT:

Unichem International will abide by all of the requirements set forth in Section 5-209 where applicable and will seek approval from the EID on this matter. Please refer to the Blanket Plugging Bond (Surety Bond) in Exhibit #6.

5-210 INFORMATION TO BE CONSIDERED BY THE DIRECTOR:

- A. Noted for in situ extraction wells.
- B. (1) The information required in Part III, Sections 3-106C (1-8) has been provided under the original discharge plan submitted to the OCD. This information is also contained in Exhibit #1.
 - (2) The applicable area of review is set forth in Exhibit #7. Please note that there are no known springs, mines, or quarries within the area of review. With respect to the general location of residential properties and roads, Exhibit #7 includes maps of the area of review for reference purposes.

There is a depressed area that lies approximately 300 yards northeast of the brine station, which is occasionally noted to collect rain water. When full of water, this pond is used by the local ranchers to water cattle.

There are two water wells within the area of review currently listed by the State Engineer's office. These are shown and marked with a highlighter in Exhibit #8. The two wells listed are both dedicated to the brine station and are licensed by the State Engineer's office for fresh water sales and production of brine. Originally listed as OWD wells (used for oil well drilling), they were converted to

Truckers #1 Brine Station

industrial and commercial wells. Both of the wells are drilled to 150' with 7" casing--water was found at 70' below the surface.

- (3) Refer to Exhibit #9 for a complete tabulation of the data available on all wells within the area of review. The one well listed in Exhibit #9 has been plugged and abandoned, per information on file with the OCD records.
- (4) Noted for in situ extraction wells.
- (5) Important fresh water (sands) appears to go to a depth of 150', with the primary ground water being the ogalalla aquifer found as shallow as 70' below the surface in the area of review.

Any potential usage ground water between 150' and the injection zone of 2,140' to 2,270' has not been identified at this time. Ground water in this area generally flows downgradient from NW to SE. A map and cross-section can be provided if deemed necessary.

- (6) There are no known faults, nor are any suggested from the investigation. Again, a map and cross-section can be provided if deemed necessary. The geological structure can be interpreted from the various well logs on file and listed in Exhibit #9.
- (7) Generalized maps and cross-sections illustrating the regional geologic setting can be provided to the New Mexico EID upon request.
- (8a) The average injected fluid is 518 bbl/day over an 18-year time span. The maximum injected fluid rate possible is 90 bbl/hour or 2,160 bbl/day, which represents the injection pump capability. Refer to Exhibit #10, which represents a summary of the injection volumes.
- (8b) The average injection pressure varies from 225 psig to 300 psig, with the maximum injection pressure experienced to date being 300 psig.
- (8c) The injection fluid is fresh water obtained from two water wells located on site, as shown in the original OCD submittal in Exhibit #1. Chemical analysis of the injection fluid utilized is provided in Exhibit #5.
- (9) This requirement is duly noted and compliance is agreed to as deemed necessary.

Truckers #1 Brine Station

- (10) Generally, fresh water is pumped down the casing through perforations at approximately 2,120'; the water is mixed in an underground cavern created by continual injection of fresh water. The brine is returned through the tubing at approximately 2,260' and pumped to the surface. The pressure increases when salt builds up at the perforations, resulting in blockage.
- (11) A proposed stimulation program consists of reversing the flow in order to clear any salt blockage.
- (12) Actual injection procedures consist of pumping fresh water down the casing and producing brine out of the tubing, interspersed with short periods of reversal to clear lines of salt blockage.
- (13) Please refer to Exhibit #2 for a plot plan and to Exhibit #3 for the details of the surface piping schematic. The subsurface construction is shown on page three of Exhibit #1, and a depiction of the drilling of the well is provided in Exhibit #9.
- (14) Not applicable, since this permit is for renewal and not for construction.
- (15) The contingency plan for Truckers #1 Brine Station will include daily monitoring of the system. Should a potential problem occur, the system will be shut down and necessary repairs implemented in order to be in proper compliance.

It shall also include notification in accordance with the EID requirements, accompanied by restitution for any damaged ground water deemed to be the responsibility of Unichem International.

An additional aspect of the contingency plan shall consist of an updated plugging and abandonment procedure to include provision of all required bonds.

Unichem International will provide a more-detailed description of its contingency plan in accordance with Water Quality Control Commission guidelines at the request of the EID.

(16) This requirement duly noted and compliance agreed to.
Unichem International will submit additional material as
deemed necessary.

Truckers #1 Brine Station

- (17) This requirement duly noted and compliance agreed to--please refer to Exhibit #6.
- C. (1-7) Requirements noted and complied with in this submittal.

5-300 INJECTION WELL NOTIFICATION REQUIREMENT:

- A. The requirement in this section is duly noted and the information indicated is currently on file with the EID.
- B. This statement has been duly noted and compliance is agreed to.



Home Office 707 N. Leech, P. O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

September 20, 1982

Mr. Joe Ramey Energy and Minerals Department Oil Conservation Division

> RE: Brine Well Discharge Plan Truckers Water Co. Brine Well #1 Sec. 1 - T19S - R35E Unit A

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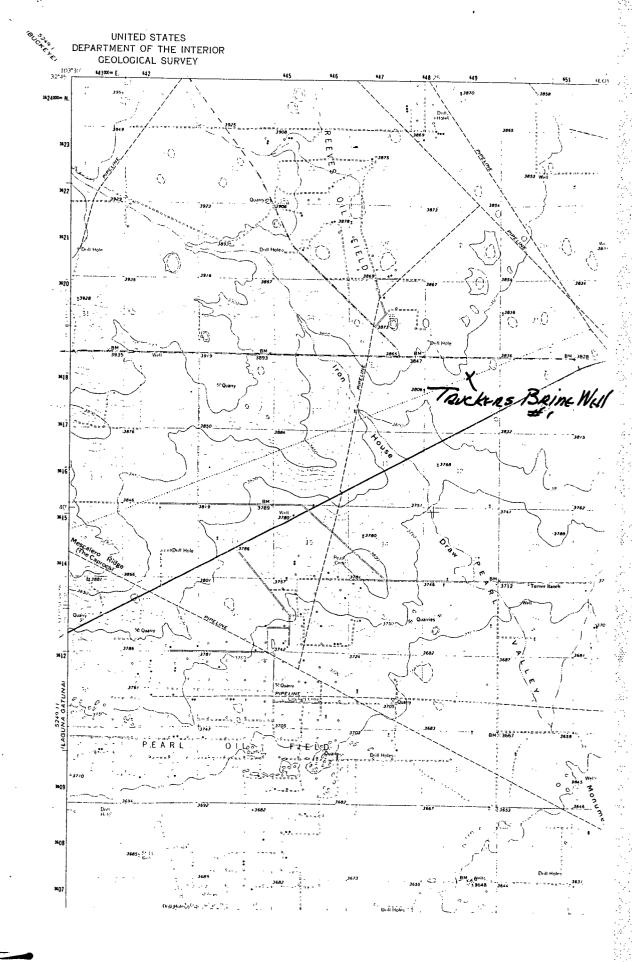
Very truly yours,

Unichem International Inc. Truckers Water Co. Division

R. J. Brakey

Vice President

RJB/js



| Name of the injection formation | | SECTION | 198 | 35 E |
|--|--|---|----------------------------------|-------------------|
| Surface Casing Size 13%" Tot | | | | |
| Size 13% " Cemented with 450 ss. TOC CIRCUlated rest determined by Hole size In'/2 Intermediate Casinn Size 95% " Cemented with 2700 ss. TOC NA rest determined by Hole size NA Long strinn Size 5½ " Cemented with 1000 ss. TOC NA rest determined by Hole size NA Long strinn Size 5½ " Cemented with 1000 ss. TOC ON NA rest determined by Hole size 9% asy Total depth 3000 PRD Sulfaction interval 2140 rest to 2270 (parforated or open-hole, inaccute which) Total least Log. 0-25 Calche + SnR 25 310 Red Bed + Anny hydrite 310-1940 Annyhydrite + 8d bed. 1940-2140 Annyhydrite + 8d bed. 1940-2140 Annyhydrite + SnH. 2140-2140 Annyhydrite + SnH. 2140-2270 Salf Anne of field or Peal (if applicable) Is this an evell critical formation Salf Name of field or Peal (if applicable) Is this an evell critical for injection? The salf such applicable of the shall such appli | | <u> 1</u> | abular Data | |
| Internediate of feet determined by Hole size 17/2 Internediate Casinn Size 9/8" Tot NA Feet determined by Hole size NA Long strinn Size 5/8" Total depth 3000 PBD Salting Total depth 3000 PBD Total depth 3000 PBD Salting Total depth 3000 PBD Total depth 3000 PBD Salting Total depth 3000 PBD Total depth 3000 PBD Salting Total depth 3000 PBD Total depth 3000 PBD Salting Total depth 3000 PBD Total depth 4000 PBD Tot | | | f Cemented with | 450 |
| Hole size 19/2 Internediate Casinn Size 9/6" TOC NA rest determined by Hole size NA Long string Size 5/2" Total depth 3000 PBD Salt Injustion interval Originated or open-hols, inarcate which) Total Rest Log. O-25' Cakhe + Sad 25' 310' Red Bed + Any hydrate 310-1940 Any hydrate + Red Ded 1940-2140 Any hydrate + Red Ded 1940-2140 Any hydrate + Salt 2140-2270 Salt Total depth 3000 PBD Salt Injustion interval O-25' Cakhe + Sad 25' 310' Red Bed + Any hydrate 310-1940 Any hydrate + Red Ded 1940-2270 Salt Total depth 3000 PBD Salt Injustion interval In 1940-1940 Any hydrate 310-1940 Any hydrate + Red Ded 1940-2270 Salt The salt of the injection formation Salt Name of the injection formation Salt Name of field or Pool (if applicable) Is this a new well drilled for injection? The Year No If no, for what purpose was the well originally drilled? Exploratory WildCat Orlongs has the well ever been preferated in any other zone(s)? List all such perforated intervals and give plugging datail (sacks of cament or bridge plug(s) used) Give the depth to and name of any overlying angles underlying oil or gue zones (needs) in | T II | | | |
| Size 9% Cemented with 2700 sx. TOC NA feet determined by Hole size NA Long strim Size 5½ Cemented with Mone sx. TOC Feet determined by Hole size 9% Gay Total depth 3000 PRD SAH Insection interval 2140 Feet to 2270 (perforated or open-nois, indicate which) Paillers Lag. 0-25' Cakene + Snd 25' 310' Red Bed + Any hyderte 310-1940 Anyhyderte + Red bed 1940-2140 Anyhyderte + Salt 2140-2270 Sait Total depth Salt 2270 Seroe PAD 380 Tohing Inned with Net Lined set in a (saterial) packer at feet describe any other casing-tubing seal). And of field or Pool (if applicable) Is this a new well drilled for injection? The No If no, for what surpose was the well originally driller? Exploratory MadCat OdorGa Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cenent or bridge plug(s) used) As the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cenent or bridge plug(s) used) Sive the depth to and name of any overlying and/or underlying did or gas sance (needs) in | | | | |
| TOC NA feet determined by Hole size NA Long string Size 5½ Cemented with More sx. TOC feet determined by Hole size 9½ cg Total depth 3000 PBD Sattling feet to 2270 (perforated or open-hole, indicate which) Drillers Leq. 0-25' Cakee + Sad 25' 316' Red Bed + Anny hyderte 310-1940 Anyhyderte + Red bed 1940-2140 Anyhyderte + Sad + 2140-2270 Sad + 2170 2180 21 | 13 % 61 | Intermediate Casing | | |
| Hole size NA Long string Size 5½ | 316 | Size <u>95%</u> | Cemented with | 2700 sx. |
| Long string Size 5½" " Cemented with More sx. TOC Feet determined by Hale size 9½ asg Total depth 3000 PAD SAIT Injection interval Paillers Leq. 0-25' Calche + Snd 25' 310' Rad Bed + Any hyderte 310'-1940 Anyhyderte + Red bed 1940-2140 Anyhyderte + Sait 2140-2270 Sait 2140-2270 Sait Ane of the injection formation Sait Name of the injection formation Sait Name of field or Pool (if applicable) Is this a new well drilled for injection? The Year To No If no, for what purpose were the well originally drilled? Exploratory WildCat OilonGa Has the well ever been perforated in any other zone(a)? List all such perforated intervals and give plugging detail (sacks of coment or bridge plug(a) used) And contains a none of any overlying and/or underlying ail or gas zones (pools) in Give the depth to and name of any overlying and/or underlying ail or gas zones (pools) in | | | feet determined by | |
| Size 51/2" Cemented with Mlone sx. TOC Feet deteroined by Hole size 97/8 asg Total depth 3000 PDD Soft Injustion interval Alto (perforated or open-hole, indicate which) Drillers Lag. 0-25' Cakine + Snd 25' 316' Red Bed + Any hyderite 310-1940 Anyhyderite + Red bed. 1940-2140 Anyhyderite + Saft. 2140-2270 Saft Total depth 10 and with Mot Lined (material) set in a man of the injection formation Saft Name of the injection formation Saft Name of field or Pool (if applicable) Is this a new well drilled for injection? The saft Saft Saft Saft Saft Saft Saft Saft S | | • | | |
| TOC Feet deteroined by Hole size 9% ass Total depth 3000 PBD Salt Insection interval 2140 Feet to 2270 (perforated or open-hole, indicate which) DRINERS Lag. 0-25' Cakche + Snd 25' 310' Red Bed + Anny hyderite 310-1940 Anyhyderite + Eed bed. 1940-2140 Anyhyderite + Salt. 2140-2270 Salt 2270 2270 300 PBD DRINERS Lag. 0-25' Cakche + Snd 25' 310' Red Bed + Anny hyderite 310-1940 Anyhyderite + Salt. 2140-2270 Salt 2170 2270 300 PBD DRINERS Lag. 0-25' Cakche + Snd 25' 310' Red Bed + Anny hyderite 310-1940 Anyhyderite + Salt. 2140-2270 Salt 2170 2270 2270 300 PBD (perforated or open-hole, indicate which 300 PBD (perforated or open-hole, indicate which 310-1940 Anyhyderite 310-1940 Anyhyderite 310-1940 Anyhyderite 310-1940 Anyhyderite 310-1940 Anyhyderite 310-1940 Anyhyderite 310-2140 Anyhyde | | | " Cemented with | Mone sx. |
| Total depth 3000 PRD Salt Insalt Ins | | TOC | feet determined by | |
| Injection interval 2140 | | | | • |
| Table 1 | | | PNU | |
| Daillers Lag. O-25' Caliche + Sad 25' 310' Red Bed + Any Auderte 310-1940 Anyhyderte+ Red bed. 1940-2140 Anyhyderte+ Salt. 2140-2270 Salt 2170 2140 2270 300 P3D Ange P3D Interval any other casing-tubing seal). The cost of the injection formation Name of the injection formation Name of field or Pool (if applicable) Is this a new well driller for injection? Test Tool No. If no, for what purpose was the well originally driller? Exploratory WildCat Olonga Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cement or bridge plug(s) used) Size the depth to and name of any overlying and/or underlying oil or gas zones (pools) in | 629 | | to 2270 | feet |
| Orallers Coq. O-25' Caliche + Snd 25' 316' Red Bed + Any hydrifte 310" 1940 Any hydrifte + Red bed 1940 - 2140 Any hydrifte + SAH. 2140 - 2270 SaH 2170 2 | 1/15 | | ole, indicate which) | _ |
| 310-1940 Anyhyderte + Red bed. 1940-2140 Anyhyderte + SAH. 2140-2270 SaH 2170 21 | | | S. J. | |
| 310-1940 Anyhyderte+ ked bed. 1940-2140 Anyhyderte+ SAH. 2140-2270 SaH 2140-2270 SaH 2270 2 | 1 8 T S | 25' 310' Red E | 3ed + Any hyderte | |
| 2/10 - 2270 Saft 2/10 - 2140 2/10 - 2270 2/10 - 2140 | (%) | 310-1960 Any | hydrite + Red bed | • |
| 2270 2270 2270 2270 2270 2270 2270 2270 | | 1960-2140 An 2140-2270 S | yhydrite+>A)+. | |
| Tobing | | 2.70 2075 | | • |
| Tobing | 2170 | | | |
| 1 238 Tobing | 2270 | · | , | |
| Mo packer at | 18 (0.11) French & | | | |
| Name of the injection formation | | lined with Not Lines | 1 | set in a |
| Name of the injection formation | 23/8 Tobing | o packer : | et | feet |
| Name of the injection formation | <u></u> | | | |
| Name of Field or Pool (if applicable) Is this a new well drilled for injection? /- Yes // No If no, for what purpose was the well originally drilled? Exploratory WildCat OilorGa Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cement or bridge plug(s) used) Give the depth to and name of any overlying and/or underlying oil or gas zones (pools) in | (018.0 8.1000E1) <u>M</u> | ubing seal). | | |
| Is this a new well drilled for injection? / Yes / No If no, for what purpose was the well originally drilled? Exploratory WildCat OilonGa Has the well ever been perferated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cement or bridge plug(s) used) Give the depth to and none of any overlying and/or underlying oil or gas zones (pools) in | r describe any other casing-to | | | |
| Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cement or bridge plug(s) used) TH. Give the depth to and none of any overlying and/or underlying oil or gas zones (pools) in | r describe any other casing-to her Data Name of the injection forms | 54H | | |
| Give the depth to and name of any overlying and/or underlying oil or gas zones (pools) in | r describe any other casing-to- her Data Name of the injection format Name of Field or Pool (if a) | tion Salf pplicable) for injection? / Yes | | |
| Give the depth to and name of any overlying and/or underlying oil or gas zones (pools) in | r describe any other casing-to- her Data Name of the injection format Name of Field or Pool (if a) | tion Salf pplicable) for injection? / Yes | | ulldCaf OilorGas |
| | r describe any other casing-to- her Data Name of the injection forma Name of Field or Pool (if a) Is this a new well drilled If no, for what purpose was | pplicable) for injection? / Yes the well originally drills | ExploRATORY | |
| | r describe any other casing-to- her Data Name of the injection forma Name of Field or Pool (if a) Is this a new well drilled If no, for what purpose was | pplicable) for injection? / Yes the well originally drills | ExploRATORY | |
| | r describe any other casing-to- her Data Name of the injection forma Name of Field or Pool (if a) Is this a new well drilled If no, for what purpose was | pplicable) for injection? / Yes the well originally drills | ExploRATORY | |
| | r describe any other casing-to- her Data Name of the injection forma Name of field or Pool (if a; is this a new well drilled If no, for what purpose was Has the well ever been perford give plugging detail (s | pplicable) for injection? / Yes the well originally drills crated in any other zone(s) acks of cement or bridge places | e Exploratory tist all such ass | forated intervals |
| | r describe any other casing-to- her Data Name of the injection forma Name of field or Pool (if a; Is this a new well drilled If no, for what purpose was Has the well ever been perford give plugging detail (s | pplicable) for injection? / Yes the well originally drills crated in any other zone(s) acks of cement or bridge places | e Exploratory tist all such ass | forated intervals |

| | 1000 Bb1 Brins | Fresh Mater Well #1 |
|-------------------|------------------------|-----------------------------------|
| | 821ne | TRUCKER MAT SURTAGE SI-7195 |
| | 210 86 | ER Company # |
| Remp Brine Well | 210 Bbl Seo Bbl Freesh | Freesh Water Mer Page 4 |

UNICHEM INTERNATIONAL

601 NOTH LEECH

P.O.BOX1499

HOBBS. NEW MEXICO 88240

OMPANY: ROWLAND TRUCKING

ATE: 3-26-82

FLD.LEASEEWELL: TRUCKERS #1 ERINE

MPLING POINT: SALT WATER WELL

TATE SAMPLED: 3-24-82

| | EC | 11 | - | Ţ | C | | C, | R | A | V | I | T | Y | | = | | 1 | | 1 | 9 | 8 | | | | | |
|-----|----|----|---|---|---|---|----|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|-----|----|---|---|
| 0.0 | Tλ | I. | | D | I | s | 5 | 0 | L | v | E | n | | S | O | L | I | D | S | | = | Z | 9 : | 34 | ć | 7 |
| , H | = | | 6 | | 8 | 1 | | | | | | | | | | | | | | | | | | | | |

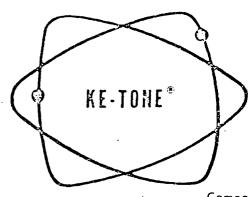
| COTAL DISSOLVED SOLIT | DS = 293467 | | · |
|--|--|-----------------------------------|-----------------------------------|
| | | ME/L | MG/L |
| CATIONS | | | |
| LCIUM MGNESIUM GODIUM | (CA)+2 (MC)+2 (NA),CALC. | 66.6 103. 4854. | 1336 1256. 111603. |
| ANIONS | | | |
| CARBONATE CARBONATE DROXIDE LIFATE CHLORIDES | (HCO3)-1 (CO3)-2 (OH)-1 (SO4)-2 (CL)-1 | 1 0 0 8 8 . 4 4 9 3 5 | 61.0 0 0 4250 174960. |
| DISSOLVED GASES | | | |
| REON DIGXIDE LYDROGEN SULFIDE LYGEN | (CO2) (H2S) (O2) | NOT RUN NOT RUN NOT RUN | · |
| ROM(TOTAL) PARJUM MIGANESE | (FE) (EA)+2 (MN) | NOT RUN NOT RUN | 6.7 |

| SCALING | INDEX | TEMF |
|---------|-------|------|
| | | |

3 0 C 86F -2.2 AREONATE INDEX
ALCIUM CAREONATE SCALING UNLIKELY

LFATE INDEX ALCIUM SULFATE SCALING - . 28 UNLIKELY

TELEPHONE: HOBBS 393-7751 AREA CODE - 505



CHEMICAL CORPORATION

OF NEW MEXICO

601 NORTH LEECH

P. O. BOX 1499

HOBBS, NEW MEXICO 88240

Company Rowland Trucking

West Hobbs Station

Lease Truckers _____

Type of Sample Fresh Water

WATER ANALYSIS

| IONIC FORM | me/l * | mg/l - |
|--|--|---|
| Calcium (Ca++) | _ 3.36 | 67 |
| agnesium (Mo++) | 1.00 | 12 |
| sodium (Na+) (CALCULATED) | 1.58 | 36 |
| ron (Total) | | |
| 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | | |
| | 9 (0) AB | |
| | **** ********************************** | and the second of the second |
| | | |
| Disease and IUCO 1 | | |
| Bicarbonate (HCO ₃) | 4.00 | 244 |
| rbonate (CO 5 -) droxide (OH-) | Not | Found |
| Sulphate (SO ₄ -) | Not | Found |
| □ loride (C1 -) | 0.81 | 39 |
| ionue (C1-) | | . 40 |
| | | |
| Total Dissolved Solids | en de establecaria substitut en esta e establecaria. | 438 |
| 5, 76 | THE CONTROL OF THE CO | |
| , We X | | · · · · · · · · · · · · · · · · · · · |
| 7.65 ph c 68 °F 7° | | |
| solved Solids on Evap. at 103° - 105° C | m | |
| rdness as Ca CO ₃ | 4.36 | . 218 |
| Larbonate Hardness as CaCO ₃ (temporary) | 4.00 | 200 |
| n-Carbonate Hardness as CaCO3 (permanent) | .0.36 | 18 |
| calinity as CaCO, | 4.00 | 200 |
| pecific Gravity c 68° F 1.000 | · · · · · · · · · · · · · · · · · · · | |
| | m na an in an | - · · - · · · · · · · · · · · · · · · · |
| and the second s | | |

- * mg/l = milligrams per Liter
- me/l = milliequivalents per Liter

CaCO₃ Scaling Index slightly positive @ 86⁰F(0.52)

CaSO₄ Scaling Index negative

Page 6

anangananananananan Meles Weter Work amanananananananan

STATE OF NEW MEXICO

Ravised 6-17-77

\$50,000.00 BLANKET PLUGGING BOND

BOND NO. 4446488

(For Use of Surely Company)

(Note: File with Oil Conservation Commission, P. O. Box 2088, Santa Fe 87501)

KNOW ALL MEN BY THESE PRESENTS:

| (a corporation organized in the State of New Mexico , with its principal office in the city Hobbs , State of New Mexico , and authorized to do business the State of New Mexico), as PRINCIPAL, and HARTFORD ACCIDENT & INDEMNITY corporation organized and existing under the laws of the State of Connecticut , and authorized | International, Inc., et al | dividual) (a partnership) |
|--|---|---------------------------|
| the State of New Mexico), as PRINCIPAL, and <u>HARTFORD ACCIDENT & INDEMNITY</u> corporation organized and existing under the laws of the State of <u>Connecticut</u> , and authorize | I in the State of New Mexico , with its princip | |
| the State of New Mexico), as PRINCIPAL, and HARTFORD ACCIDENT & INDEMNITY corporation organized and existing under the laws of the State of Connecticut, and authorize | , State of <u>New Mexico</u> and author | orized to do business in |
| corporation organized and existing under the laws of the State of Connecticut and authorize | HADTEADD ACCIDENT & INDEMNTTY | |
| | ad existing under the laws of the State ofConnecticut | and authorized |
| to do business in the State of New Mexico. as SURETY, are held firmly bound unto the State of New Mexico, for the u | te of New Mexico. as SURETY, are held firmly bound unto the State of N | New Mexico, for the use |
| and benefit of the Oil Conservation Commission of New Mexico pursuant to Section 65-3-11. New Mexico Statut | Conservation Commission of New Mexico pursuant to Section 65-3-11, | New Mexico Statutes |
| Annotated, 1953 Compilation, as amended, in the sum of Fifty Thousand Dollars(\$5,0,000,00) lawful money of the Unit | lation, as amended, in the sum of Fifty Thousand Dollars(\$50,000,00) lawfu | ul money of the United |
| States, for the payment of which, well and truly to be made, said PRINCIPAL and SURIETY hereby bind themselves, the | of which, well and truly to be made, said PRINCIPAL and SURETY hereby | y bind themselves, their |
| successors and assigns, jointly and severally, firmly by these presents, | dirtly and severally, firmly by these presents, | |

The conditions of this obligation are such that:

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases with the State of New Mexico; and

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals; and

WHEREAS. The above principal, individually, or in association with one or more other parties, has commenced or may commence the drilling of wells to prospect for and produce oil or gas, or carbon dioxide (CO₂) gas or belium gas, or does own or may acquire, own or operate such wells, or such wells started by others on land embraced in said State oil and gas leases, or carbon dioxide (CO₂) gas leases, or belium gas leases, and on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals, the identification and location of said wells being expressly waived by both principal and surety hereto.

NOW, THEREFORE, If the above bounden principal and surery or either of them or their successors or assigns, or any of them, shall plug all of said wells when dry or when abandoned in accordance with the rules, regulations; and orders of the Oil Conservation Commission of New Mexico in such way as to confine the oil, gas, and water in the strata in which they are found, and to prevent them from escaping into other strata;

THEN, THEREFORE, This obligation shall be null and void; otherwise and in default of complete compliance with any and all of said obligations, the same shall remain in full force and effect.

PROVIDED, HOWI VER, That thirty (30) days after receipt by the Oil Conservation Commission of New Mexico of written notice of cancellation from the surety, the obligation of the surety hereunder shall terminate as to property or wells acquired, didled, or started after said thirty (50) day period but shall continue in effect, notwithstanding said notice, as to property or wells theretofore acquired, didled, or started.

| PRINCIPAL. | HARTFORD ACCIDENT & INDEMNITY CO.: |
|--|--|
| P.O. Box 1499, Hobbs, N.M. 88240 | 6061 S. WITTow Dr., Englewood, Colo. 8011 |
| my William de Walton | By tat Argile |
| Signature Vice President V | Pat Cargile |
| (Note: Principal, if corporation, affix corporate seal here.) | (Note: Corporate surery affix corporate seal here.) |
| | |
| | |
| ACKNOWLEDGMENT FORM I | FOR NATURAL PERSONS |
| STATE OF | • |
| | , 19, before me personally appeared |
| described in and who executed the foregoing instrument and ac- | to me known to be the person (persons) |
| | and seal on the day and year in this certificate first above |
| vritten. | Notary Public |
| My Commission expires | Normy Fuelic |
| ACKNOWLEDGMENT FOR | M FOR CORPORATION |
| STATE OF New Mexico COUNTY OF Lea) ss. | |
| On this 26th day of October | , 19_81, before me personally appeared, to me personally known who, being by me |
| duly sworn, did say that he is Vice President | of |
| | |
| hehalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand | |
| behalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. | and scal on the day and year in this certificate first above |
| behalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 | rs, and acknowledged said instrument to be the free act and |
| hehalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 | and scal on the day and year in this certificate first above Notary Public |
| behalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I | and scal on the day and year or this certificate first above Notary Public |
| hehalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF | and scal on the day and year in this certificate first above Notary Public October . 19 81 , before |
| hehalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Mexico COUNTY OF Lea On this 26th day of | and scal on the day and year in this certificate first above Notary Public October 10 81, before 10 me personally known, who, |
| behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Mexico Set May of May of May be me appeared Pat Cargile Set May of May of May for May of May of May be me doly sworn, did say that he is Set Matterne Martford Accident 8 INDEMNITY CO. Behalf of said corporation by authority of its board of directors. | october |
| behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Mexico) ss. COUNTY OF Lea) ss. On this 26th day of | october 10 me personally known, who, and that the forepoing instrument was signed and scaled on the forepoing instrument was signed and scaled on the signed and acknowledged said instrument to be the free act and |
| behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Mexico Set May of Martine being by me duly sworn, did say that he is Set Matterne HARTFORD ACCIDENT & INDEMNITY CO. behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. | October 10 me personally known, who, and that the foreyong instrument to be the free act and hard the foreyong instrument was signed and scaled on the day and year in this certificate first above to the free act and d and scale for the day and year in this certificate first above the f |
| behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Mexico Set May of May | october |
| behalf of said corporation by authority of its board of directodeed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Hexico COUNTY OF Lea On this 26th day of | October |
| behalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Hexico Set May of Set May of May being by me duly sworn, did say that he is MATFORD ACCIDENT & INDEMNITY CO. behalf of said corporation by authority of its board of director deed of said corporation. EN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires | October 10 Me personally known, who, and that the forepoing instrument to be the free act and hand seal on the day and year in this certificate first above Notary Public. TOR CORPORATE SURETY October 10 Me personally known, who, by in fact of and that the forepoing instrument was signed and scaled on his, and acknowledged said instrument to be the free act and d and seal (on the day and year in this certificate first above the first above t |
| behalf of said corporation by authority of its board of director deed of said corporation. IN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires ACKNOWLEDGMENT FORM I STATE OF New Hexico Set May of Set May of May being by me duly sworn, did say that he is MATFORD ACCIDENT & INDEMNITY CO. behalf of said corporation by authority of its board of director deed of said corporation. EN WITNESS WHEREOF, I have hereunto set my hand written. 4-21-82 My Commission expires | and scal on the day and year in this certificate first above Notary Public FOR CORPORATE SURETY October To me personally known, who, ey in fact and that the foregoing instrument was signed and scaled on his, and acknowledged said instrument to be the free act and dand scaled on the day and year in this certificate first above Notary Public APPROVED BY: |

+ 24 Well #1 TRING! 6 呆 尹 #

| Section 26 | Township 18 South | Range 35 East |
|------------|--------------------|---------------|
| L-6868 (E) | nw_{se_{4}sw_{4} | 26-18-35 |
| L-6869 (E) | nw_{sw_{4}} | 26-18-35 |

Section 27 Township 18 South Range 35 East

L-3783 2310 ft. from South & West Lines OWD
L-3963 NW4NE4 OWD

Section 34 Twp. 18 S., Rge. 35 E.

L-7129 SE4SW4S Stock Shallow

Section 35 Township 18 South Range 35 East L-3678 OWD

Section 36 Township 18 S. Range 35 E. —
L-6313 NE\2NE\2 Comm.

Section 29

Township 18 South

Range 36 East

L-1551

denied Power Gemer.

Section 30

Township 18 South

Range 36 East

L-1552

L-5200-X-5

denied Ind.
Approximate Center

Ind.

L-6641(E)

SEZNEZNWZ

OUD

Section 31

Township 18 South

Range 36 East

L-1553

L-4892 (Withdrawn)

swaswaswa

Ind. Comm.

Comm

| Section 1 | Township 19 South | Range 35 East |
|-----------------|-------------------|---------------|
| L-2359 | swaswanwa | Dom. |
| L-3945 | SWANEANEA | OWD |
| L-3945 (2) | SWANEANEA | OWD |
| L-5434 | SWANEANEA | Ind. |
| L-6180 | recreational | |
| L-5434-S | SEIaNWIANEIa | COM. |
| L-8582) | SE‡SE‡ | IND |
| L-8583 11 2 5.1 | SELNEL | IND |
| | | |

in interest of

| Section 2 | Township 19 South | Range 35 East |
|-----------|-------------------|---------------|
| L-5764 | sełseł neł | WF |
| L-5764-X | neł neł neł | WF |

| Section 13 | Township 19 South | Range 35 East |
|------------------|-------------------|---------------|
| L-1756 L-4563 | NE 4SE 4 | Irr. Irr. |

| Section 14 | Township 19 South | Range 35 East |
|------------|----------------------------------|---------------|
| 1,-6801 | N ¹ 2S ¹ 2 | Stock |

| Section 5 | Township 19 Sou | th Range 36 East |
|----------------------|-------------------|------------------|
| L-2720 L-4192-X-2 | NW 1 NE 1 | Ind. Comm. |
| L-6050 | nanwanwa | Com. Oper. Dom. |
| L-6853 | NE ¹ 4 | Dom. |
| L-7431-S | NEINEI | IRR & COM |

| Section 6 | Township 19 South | Range 36 East |
|-----------|-------------------|---------------|
| L-2889 | SE4SE4 | OWD |
| L-2720 | NW å | Ind. |
| L-2329 | | OWD |
| L-2718 | NE ¼ | Ind. |
| L-2719 | NE ¼ | Ind. |
| L-2720 | NE 4 | Ind. |
| L-2721 | NE ¼ | Ind. |
| | | |

| Section 8 | Township 19 South | Range 36 East |
|-----------|-------------------|---------------|
| L-2328 | | OWD |

| Section 18 | | Township 19 South | Range 36 East |
|------------|--------|-------------------|-----------------|
| L-2928 | closed | Sw4SE4 | Refinery Opera. |
| L-7431 | | ne½ne½se½ | Irr. |

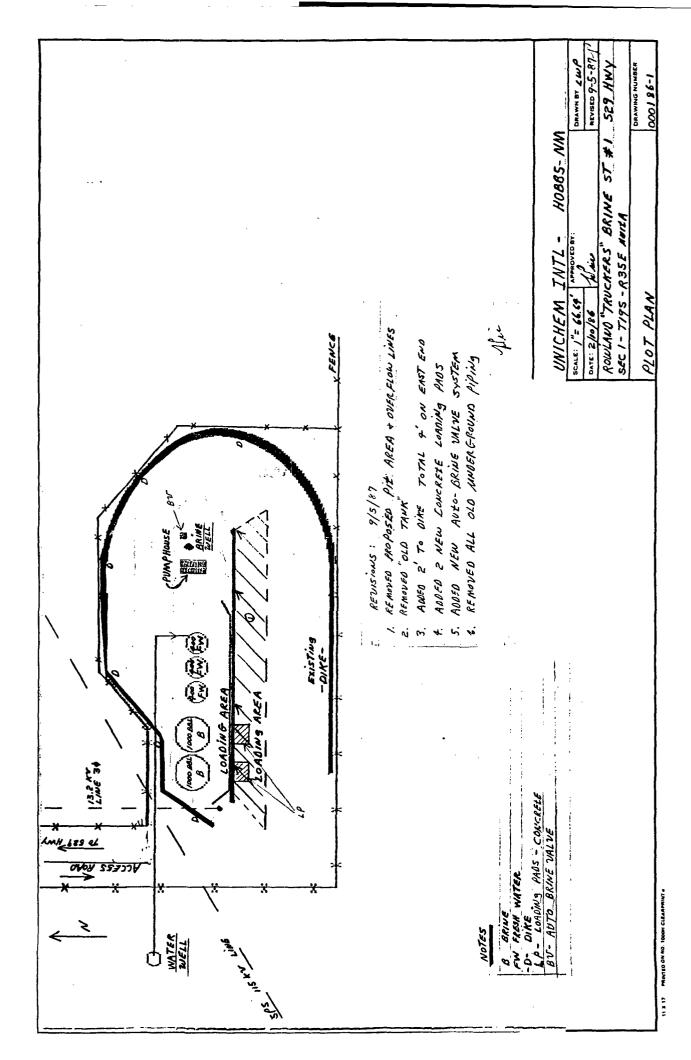
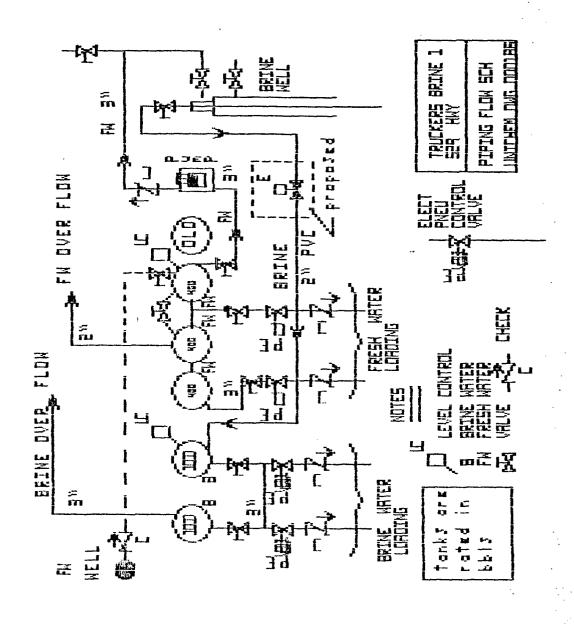


EXHIBIT #3

PIPING FLOW SCHEMATIC TRUCKERS #1 BRINE STATION





THE REPRODUCTION OF

THE

FOLLOWING

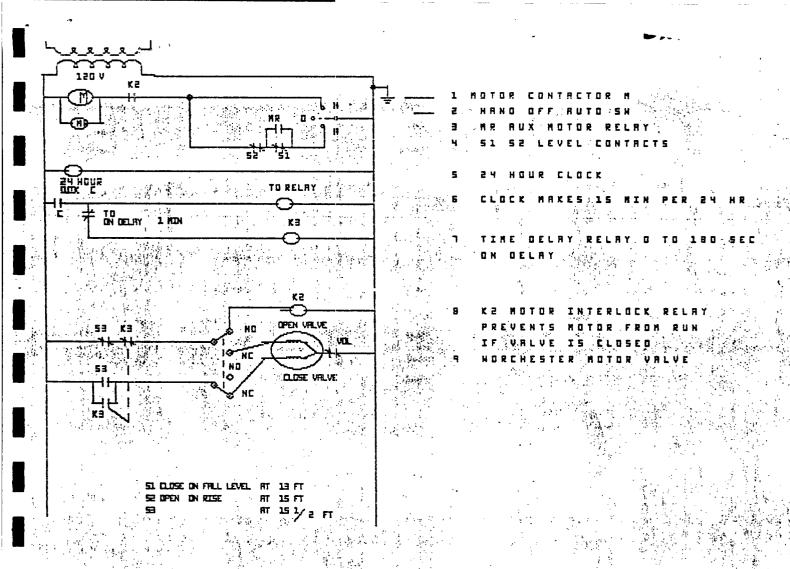
DOCUMENT (S)

CANNOT BE IMPROVED

DUE TO

THE CONDITION OF

THE ORIGINAL



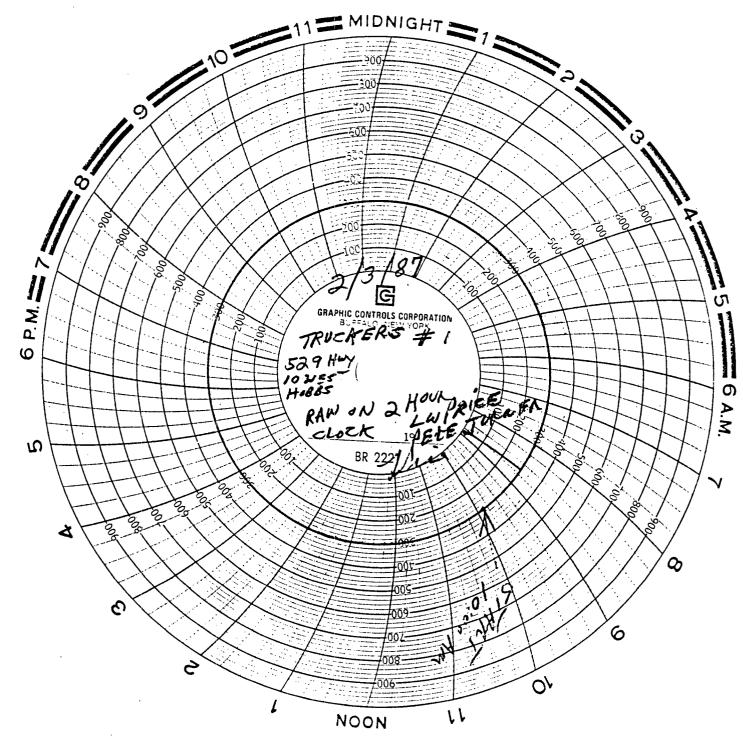
SEQUENCE OF OPERATION

OFF POSITION
HAND POSITION
AUTO POSITION

MOTOR WILL NOT RUN BRINE VALVE WILL OPERATE AS NORMAL MOTOR WILL RUN IF BRINE VALVE IS OPEN ONLY MOTOR WILL CYCLE OFF AND ON BY LEVEL CONTROL OF SI AND SE NOTOR WILL SHUT DOWN IF BRINE VALVE CLOSES VIA KE RELAY INTERLOCK ONCE EVERY 24 HOURS CONTACT C CLOSES FOR 15 MIN AND

ONCE EVERY 24 HOURS CONTACT C CLOSES FOR 15 MIN AND PICKS UP RELAY K3 VIA NC TO TIME DELAY RELAY K3 WILL STAY PICKED UP FOR OME MIN AND WILL CAUSE BRINE VALVE TO CLOSE VIA NO K3 CONTACT A NC K3 CONTACT WILL OPEN AND DROP OUT K2 MOTOR INTERLOCK CAUSING THE MOTOR TO SHUT DOWN IF BRINE IS ALREADY CLOSED NOTHING WILL HAPPEN





MECHANICAL INTEGRITY TEST - FEBRUARY 3, 1987 TRUCKERS #1 BRINE STATION HIGHWAY 529, 10 MILES WEST OF HOBBS, NEW MEXICO



EXHIBIT #5

Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

WATER ANALYSIS

| CLIENT NAME: N.M. ENVIRONM | IENTAL IMPROVEMENT | DIV. DATE | E: 09/04/87 |
|----------------------------|--------------------|-------------|-------------|
| ********** | ************* | *********** | ***** |
| ANALYSIS | TRUCKER #1 | TRUCKER #1 | |
| PERFORMED | BRINE | FRESH | |
| | | | |
| pH | 7.09 | 7,55 | |
| P-ALKALINITY | 0 | 0 | |
| TOTAL ALKALINITY | 60 | 152 | |
| TOTAL HARDNESS | 10800 | 200 | |
| CALCIUM | 3200 | 156 | |
| MAGNESIUM | 7600 | 44 | |
| CHLORIDE | 180400 | 52 | |
| SULFATE | 51200 | 54 | |
| SPECIFIC CONDUCTANCE | 179400 | 386 | |

* ALL RESULTS EXPRESSED IN MILLIGRAMS/LITER

ANALYZED BY ROBBS LAB)

APPROVED BY 1/mm.

Jimmy Pointet

STATE OF NEW MEXICO

Revised 6-17-73

\$50,000.00 BLANKET PLUGGING BOND

| BOND NO. | 4446488 |
|----------|-----------------------------|
| | (For Use of Surety Company) |

(Note: File with Oil Conservation Commission, P. O. Box 2088, Santa Fe 87501)

KNOW ALL MEN BY THESE PRESENTS:

| That <u>Unichem In</u> | ternational, Inc., et al | | daud) (a partnership) |
|--------------------------------|---|--------------------------------------|-----------------------|
| (a corporation organized in | the State of <u>New Mexico</u> | with its principal | |
| Hobbs | , State of New Mexico | and authoriz | ed to do business in |
| the State of New Mexico) | , as PRINCIPAL, and HARTFORD | ACCIDENT & INDEMNITY | , |
| corporation organized and o | existing under the laws of the State of _ | Connecticut | and authorized |
| to do business in the State c | of New Mexico. as SURETY, are held | firmly bound unto the State of New | Mexico, for the use |
| and benefit of the Oil Ci | inservation Commission of New Mexic | to pursuant to Section 65-3-11, No | ew Mexico Statutes |
| Annotated, 1953 Compilati | on, as amended, in the sum of Fifty Th | ousand Dollars(\$50,000,00) lawful a | noney of the United |
| States, for the payment of | which, well and truly to be made, said | PRINCIPAL and SURETY hereby b | ind themselves, their |
| successors and assigns, jointl | y and severally, firmly by these presents | • | • |
| | | | |

The conditions of this obligation are such that:

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases with the State of New Mexico; and

WHEREAS. The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals; and

WHEREAS, The above principal, individually, or in association with one or more other parties, has commenced or may commence the drilling of wells to prospect for and produce oil or gas, or carbon dioxide (CO₂) gas or helium gas, or does own or may acquire, own or operate such wells, or such wells started by others on land embraced in said State oil and gas leases, or carbon dioxide (CO₂) gas leases, or helium gas leases, and on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals, the identification and location of said wells being expressly waived by both principal and surety hereto.

NOW, THEREFORE, If the above bounder principal and surery or either of them or their successors or assigns, or any of them, shall plug all of said wells when dry or when abandoned in accordance with the rules, regulations; and orders of the Oil Conservation Commission of New Mexico in such way as to confine the oil, gas, and water in the strata in which they are found, and to prevent them from escaping into other strata;

THEN, THEREFORE, This obligation shall be null and void; otherwise and in default of complete compliance with any and all of said obligations, the same shall remain in full force and effect.

PROVIDED, HOWLVER, That thirty (30) days after receipt by the Oil Conservation Commission of New Mexico of written notice of cancellation from the surety, the obligation of the surety hereunder shall terminate as to property or wells acquired, drilled, or started after said thirty (30) day period but shall continue in effect, notwithstanding said notice, as to property or wells theretofore acquired, drilled, or started.

EXHIBIT #6

| UNICHEM INTERNATIONAL INC., et al | HARTFORD ACCIDENT & INDEMNITY CO. |
|--|---|
| PIGNCIPAL. | SURCEY |
| P.O. Box 1499, Hobbs, N.M. 88240 | 6061 S. Willow Dr., Englewood, Colo. 80111 |
| 11 William & Walton | 114 Tat Carrile |
| Signature | Attorney in the |
| Vice President 11 | . · · · · · · · · · · · · · · · · · · · |
| (Note: Principal, if corporation, affix corporate seal here.) | (Note: Corporate surety affix corporate seaf here.) |
| | • |
| · | |
| | |
| | |
| ACKNOWLEDGMENT FORM | I FOR NATURAL PERSONS |
| STATE OF | |
| (OUNTY OF) | |
| On thisday of | , 19, before me personally appeared, to me known to be the person (persons) |
| described in and who executed the foregoing instrument and free act and deed. | acknowledged that he (they) executed the same as his (their) |
| | nd and seal on the day and year in this certificate first above |
| written. | |
| My Commission expires | Notary Public |
| ACKNOWLEDGMENT FO | RM FOR CORPORATION |
| STATE OF New Mexico | · • |
| COUNTY OF Lea) ss. | |
| On this <u>26th</u> day of <u>October</u> William D. Walton | , 19 81, before me personally appeared , to me personally known who, being by me |
| duly sworn, did say that he is Vice Presiden | nt of |
| behalf of said corporation by authority of its board of direct deed of said corporation. | and that the foregoing instrument was signed and scaled on ors, and acknowledged said instrument to be the free act and |
| | nd and seal on the day and year on this certificate first above |
| written. | Sill Chalrew |
| 4-21-82 My Commission expires | Notary Public |
| ACKNOWLEDGMENT FORM | FOR CORPORATE SURETY |
| STATE OF New Mexico | |
| COUNTY OF Lea) ss. | |
| On this 26th day of | |
| being by me duly sworn, did say that he isattorn | |
| | _and that the foregoing instrument was signed and scaled on lors, and acknowledged said instrument to be the free act and |
| deed of said corporation. | |
| IN WITNESS WHEREOF, I have hereunto set my har written. | nd and seal (on the day and year in) his certificate first above |
| 4-21-82 | (XXXX Whilkey) |
| My Commission expues | ismary runne |
| (Note: Corporate surety attach power of attorney.) | |
| • | APPROVED BY: OIL CONSERVÁTION COMMISSION OF NEW MEXICO |
| - | By |
| | |
| | Date |

in white

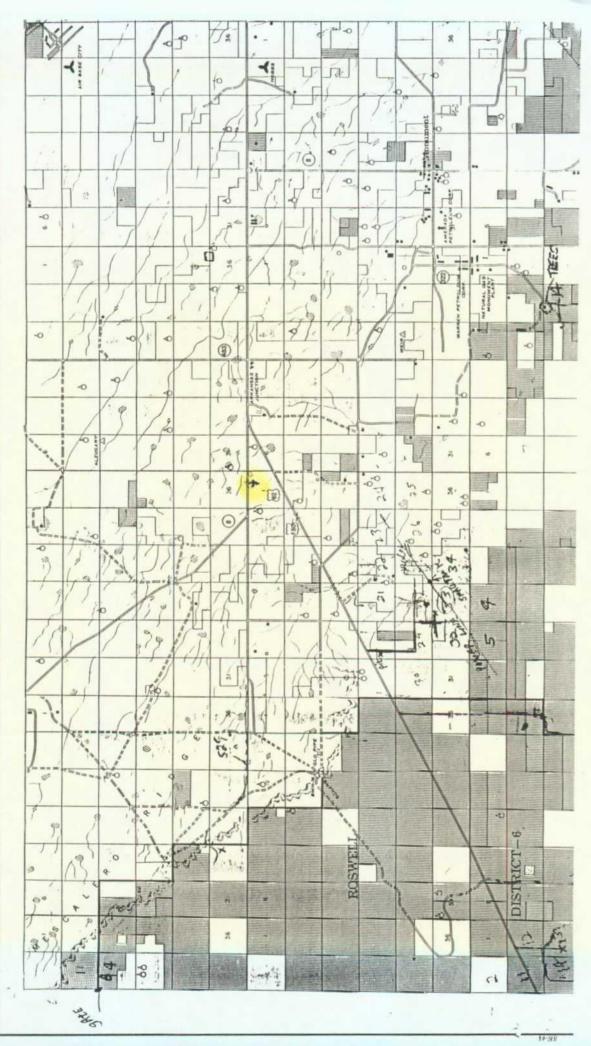
EXHIBIT #7

BUREAU OF LAND MANAGEMENT

NEW MEXICO

R. 35 E.

R. 37 E.



| *************************************** | WELLS IN AREA of REVIEW |
|---|--|
| NOT | NOT ORILLED OR PERMIT WITHORAWN |
| | L-(LEA) |
| * | L-3945(2) ARE SAME WELLS AS L-5434 + L-5434-5 |

UPDATED TO 9/4/87 STATE OF N.M. ENGR PER JOHN HERNANDEZ

Section 36

Township 18 S.

Range 35 E.

L-6313

NEZNEZ

Comm.

| | Section 1 | Township 19 South | Range 35 East |
|---|---|---|----------------------------------|
| | L-2359 | Swiswinwi | Dom. |
| | L-3945 | SWANEANEA | OWD |
| * | L-3945 (2) | SWANEANEA | OWD |
| T | L-5434 | SWIANEIANEIA | Ind. |
| L | L-6180 L-5434-S L-8582' L-8583 | recreational SE¼NW¼NE¼ SEϟSEϟ SEϟNEϟ | COM. NOT -IND NOT -IND NOT |

Section 31

Township 18 South

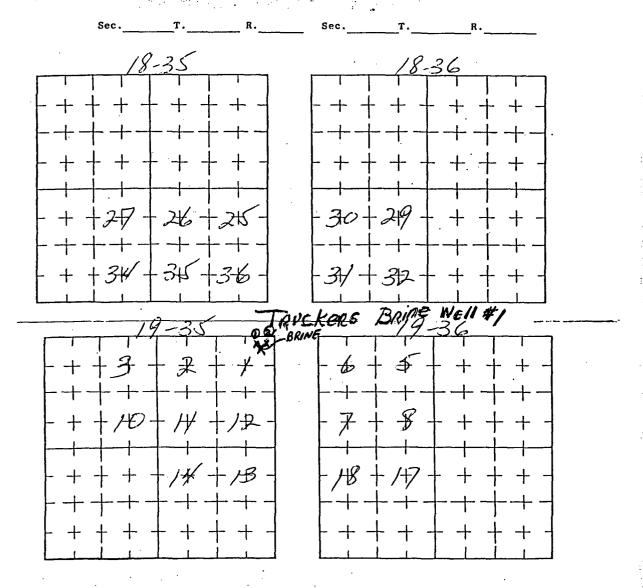
Range 36 East

L-1553

L-4892 (Withdrawn) SW4SW4SW4

-Inda NOT -Comm. NOT

| Section 6 | Township 19 South | Range 30 Last |
|-----------|-------------------|---------------|
| L-2889 | SE4SE4 | OMD |
| L-2720 | NW 🖥 | -Ind. NOT |
| L-2329 | | OWD |
| L-2718 | NE 4 | Ind√ |
| L-2719 " | NE ¼ | Ind. |
| L-2720 | NE Å | Ind. |
| 12721 | NE Ĵ | Ind. |



D 1-5434-5

Section 36 Township 18 S. Range 35 E.

L-6313 NEZNEZ Comm.

Range 35 East Township 19 South Section 1 Dom. SWASWANWA L-2359 OWD L-3945 SWANE ANE SWANEANEA OWD L-3945 (2) Ind. SWIANE LANE LA L-5434 L-6180 recreational COM. SEIANWIANEIA L-5434-S IND **SETSET** L-8582! . IND SETNET L-8583 :: 1.1 2

Section 31 Township 18 South Range 36 East

L-1553
L-4892 (Withdrawn) SW4SW4SW4 Comm.

Range 36 East Township 19 South Section 6 SE4SE4 OWD L-2889 Ind. $NW_{\frac{1}{4}}$ L-2720 OWD L-2329 Ind: NE 4 L-2718 Ind. NE 1 L-2719 Ind. NE 4 L-2720 Ind. NE 1 L-2721

EXHIBIT #9

TABULATION OF WELL HISTORY DATA PERTAINING TO WELLS WITHIN AREA OF REVIEW

<u>Listing #1</u>: Unichem International Inc., Truckers #1 Brine Well

Sec 1, T19S, R35E (Unit A)

<u>Listing #2</u>: Amoco Production Company, State "NO" (Well #1)

Sec 7, T19S, R36E (Unit E)

NOTE: Dry hole, plugged and abandoned.

| | | | | | <i>S8/S</i> | 195 | | | |
|------|------------|---|----------|-----|-------------|--------------|--|--------------|---|
| | | | | | | | ************************************** | | 1500 1000 500 0 |
| | SECTION 31 | | | | | | | 1 111 | 330 660 990 1320 1650 1980 2310 2640 2000 R 36E SECTION |
| R36E | | | | | | | | 1 i L | اما |
| R35E | | 7 | * | Н | d | -188 -148 | | | 1500 1000 500 R35 E |
| | 36 | 8 | <i>b</i> | , b | 0 | | | | 15000 1500 |
| | SECTION | Ü | ų. | * | > | | | | 6 330 660 990 1320 1650 1860 2840 2000 SECTION 1 |
| | וע | ٥ | <u>.</u> | 7 | \$ | | | | 0 330 660 990 |
| | | | | | 58/ 51 | 195 | | | |

| (917.11(10)))) 10 | 014 | 1 | 1 |
|-------------------|-----|---|---|
| AHTA PE | | | |
| ILE · | | | |
| .b.G.f. | | | |
| AND OFFICE | | | |
| RAHSPORTER | OIL | | |

NEW MEXICO OIL, CONSURVATION COMMISSION REQUEST FOR ALLOWABLE

Dim C-101 Superredee Old Colul and Coll

| ILE: | _ | VIAD | | Effective 1-1-65 |
|--|---|--|--|---------------------------------|
| .b.G.f. | AUTHORIZATION TO TRA | MISPORT OIL AND | NATURAL GAS | |
| AND OFFICE | - | | | (#1) |
| RANSPORTER GAS | | | | |
| PERATOR | - | | • | • |
| HORATION OFFICE | <u> </u> | | | |
| Unichem International | . Inc. : | | | |
| P. D. Box 1196, Eunic | e, New Mexico 88231 | | | |
| ason(s) les liling (Check proper box | | Other (Please | explain) | |
| ecompletion | Change in Transporter of: Oil Dry Ca | | | |
| range in Ownership X | Cantagheod Gan Cander | 751 | | |
| thange of pwnership give name | | | | |
| 1 address of previous ownerP | ioneer Water Company, P. | 0. Box 1196, Fun | ice, New Mexico | _ 88231 |
| ESCRIPTION OF WELL AND | | | | · |
| : Du in a Chat | Well No. Pool Dame, Including F | ormation | Kind of Lense State, Federal or Fee | Leane No. |
| Brine State | | | | |
| Unit Letter A : 660 | Feel From The North Lin | o and <u>660</u> | Feel From The Ea | ıst |
| Line of Section 1 To- | waship 195 Range | 35E , NMPM | , Lea | County |
| resentation of TRANSPOR | TER OF OIL AND NATURAL GA | s | | |
| nine of Authorized Transporter of Oil | | | o which approved copy o | (this form is to be sent) |
| and of Authorized Transporter of Car | singhead Gas or Dry Gas | Address (Give address) | o which approved copy o | f this form is to be sent) |
| | | | | |
| well produces all or liquids, va location of tanks. | Unit Sec. Twp. P.ge. | Is gas actually connecte | :d7 When | |
| his production is commingled with DAPLETION DATA | th that from any other lease or pool, | | | |
| Designate Type of Completic | on = (X) Gas Well | Notkover | Deepen Plug Ba | ck Sume Resty, Diff. Resty. |
| zie Spudded | Date Compl. Ready to Prod. | Total Depth | Р.В.Т.В | |
| (D. 1) (D. 1) | Name of Producing Formation | Top O!I/Cas Pay | Tuking [| South |
| evations (DF, RKD, RT, GR, etc.) | Notice of Producting Polimetron | 1 100 0.17 003 7-07 | Tobing t | |
| riorations | | | Depth Co | asing Shoo |
| | TUBING, CASING, AND | CEMENTING SECOR | | |
| HOLE SIZE | CASING & TUBING SIZE | DEPTH S | | SACKS CEMENT |
| | | | | |
| | | | | |
| | | | | |
| EST DATA AND REQUEST F | OR ALLOWABLE (Test piuse te al | | | e equal to ar expeed top allow- |
| I. WELL, no First New Oil Bun To Tanks | able for this de | pth or be for full 24 hours Producing Mothed (Flow | | |
| 110) 1151 New Oll N-1 10 1 111114 | | | ., ,,, | |
| angth of Tost | Tubing Pressure | Cosing Pressure | Choke S | 120 |
| cival Pred. During Test | Oll-Bble, | Water - Ubla. | Gua - MC | F |
| | 1 | | | |
| AS WELL | | | γ | |
| cival Prod. Tool-MCF/D | Langth of Tast | Bble. Condensate/ASAC | Gravity | of Condensate |
| nating district (pilot, back pr.) | Tubica Pressure (Shut-in) | Casing Pressure (Lhut | -in) Chot • S | 110 |
| ERTHFICATE OF COMPLIAN | CE | OIL (| CONSERVATION C | COMMISSION |
| | | APPROVED | 1189 1981 | . 19 |
| meniaalen have been complisii v | regulations of the Oil Connervation with and that the information given | o Ori | g. Signed by | |
| ove in true and complete to the | beat of my knowledge and beltef. | Le | s Clements | |
| 1 2 | | TITLEOil | & Gas Insp. | |

Vice Presidetn

10-14-81

This form is to be filed in compliance with HULE 1104.

If this is a request for allowable for a newly delited or despende well, this form must be accompanied by a tribulation of the deviction tout taken on the well in accordance with ROLC 114.

All portions of this form must be filled out completely for ellow-able on movement occumulated wells.

FIR out only fractions I. R. III, and VI for changes of owner, all rains or number, or transmitting or other such change of conditions

DISTRIBUTION ANTAFE FILE u.s.g.s.

NEW MEXICO OIL CONSERVATION COMMISSION REQUESTIFOR ALLOWABLE ... C. AND AUTHORIZATION TO TRANSPORTZOUZAND MATURAL GAS

Form C-104 Supersedes Old C-104 and C-110 Effective 1-1-65

| EAND OFFICE | | | | | | |
|---|------------------------|-------------------|---------------------------|---------------------------------------|-----------------------|--|
| TRANSPORTER GAS | | | | | | |
| OPERATOR | | | | | | |
| PRORATION OFFICE | | | | | • | |
| PIONEER WATER O | OMPANY, INC. | | | | | |
| \ddress P.O. Box 1196. | Eunice, New M | lex100 8823 | | | | |
| leason(s) for filing (Check proper box) | | | Other (Plea | se explain) | | |
| lew Well | Change in Transpo | orter of: | | ,,,,,,,,,,, | | |
| Recompletion | Oil [| Dry Gas | · 🔲 | | 2 | 14 |
| Change in Ownership | Casinghead Gas | Condens | sate | h de prong | - 1/1/h | Marie |
| change of ownership give name and address of previous owner | & T Inc., Box | 906, Lovi | ngton, New Me | xico | 0 | |
| ESCRIPTION OF WELL AND | LEASE. | ime, Including Fo | rmation | Kind of Lease | | Lease No. |
| 19-35-1 Sent | # 1 br | ine well | | State, Fødera | or Fee State | M14244 |
| Location | | | | | | |
| Unit Letter;660 | Feet From The | north Line | and <u>660</u> | Feet From | The east | |
| Line of Section 1 Tow | vnship 19S | Range 35 | E , NMP | м, | Lea | County |
| ESIGNATION OF TRANSPORT | | | S Address (Give addres | s to which appro | ed copy of this form | is to be sent) |
| none | | | | · · · · · · · · · · · · · · · · · · · | | |
| Name of Authorized Transporter of Cas | itnghead Gas or D | Ory Gas 🗔 | Address (Give addres | s to which appro | ved copy of this form | is to be sent) |
| it well produces oil or liquids, give location of tanks. | Unit Sec. Tw | vp. Pige. | Is gus actually conne | rted? Who | 20 | |
| this production is commingled with COMPLETION DATA we have | th that from any other | | | er number: | | |
| Designate Type of Completion | on - (X) | Gas Well | New Well Workove | Deepen | Plug Back Same | Res'v. Diff. Res'v. |
| Date Spudded | Date Compl. Ready to | Prod. | Total Depth | | P.B.T.D. | |
| this informati | 1 | | 75,2, 25, | | | |
| Elevations (DF, RKB, RT, GR, etc.) | Name of Producing For | rmation | Top Oll/Gas Pay | | Tubing Depth | |
| 2.4 | Brine | | <u> </u> | | D 1) 0 2 2 1 | |
| Perforations | | | | | Depth Casing Shoe | 1 |
| | TUBING | , CASING, AND | CEMENTING RECO | ORD | | |
| HOLE SIZE | CASING & TUB | | DEPTH | | SACKS | CEMENT |
| | 7" & 2 | 11 | 1000 2 | | to surface | |
| | | | | | | |
| | | | | | | |
| CEST DATA AND REQUEST F | OR ALLOWABLE | (Test must be a) | iter recovery of total vo | lume of load all | and must be equal to | or exceed top allow- |
| DIL WELL | | able for this de | pth or be for full 24 ho | | 6 22 1 | |
| Date First New Oil Run To Tanks | Date of Test | | Producing Method (Fi | ow, pump, gas ii | ji, eic.j | |
| Length of Test | Tubing Pressure | | Casing Pressure | | Choke Size | |
| Actual Prod. During Test | Oil-Bbls. | | Water - Bble. | | Gas-MCF | |
| <u></u> | | | L | | | |
| GAS WELL | | | | | | |
| Actual Prod. Test-MCF/D | Length of Test | | Bbls. Condensate/Mi | ACF | Gravity of Conden | sate . |
| Testing Method (pitot, back pr.) | Tubing Pressure (Shu | t-in) | Casing Pressure (Sh | ut-in) | Choke Size | |
| CERTIFICATE OF COMPLIAN | CE | | OIL | 1 1 | ATION COMMISS | SION |
| hereby certify that the rules and | regulations of the Oil | Conservation | APPROVED | | | , 19 |
| Commission have been complied above is true and complete to the | with and that the info | ormation given | BY Je | XU | Til | |
| R. L. McLean | • | - | TITLE | | 1. 6. 1. 1. | |
| MI CX | 19 0/ | | This form is | to be filed in | compliance with R | ULE 1104. |
| Tolt' | 11100 | | If this is a r | equest for allo | wable for a newly | drilled or deepened |
| President | ature) | | tests taken on th | e well in acco | rdance with RULE | on of the deviation 111. mpletely for allow- |
| June 17, 1969 | itle) | | able on new and | recompleted w | ella. | changes of owner, |
| | ate) | | well name or num | ber, or transpo | iter, or other such c | hange of condition. |

Lovington, New Mexico

(Place)

August 19, 1963

| 1711 | · · · · · · · · · · · · · · · · · · · | Santa Fe, New 1 | Mexico | N | Form G-101 Revised (12/1/55) |
|------------------------------------|--|--|--|--|---|
| | NOT | CE OF INTENTI | ON TO DRI | LL FIDE (| 90 0 |
| Notice must be gins. If changes in | the proposed plan are con QUINTUPLICATE. O | ice of the Oil Conservation Considered advisable, a copy of the copy will be returned follows submit 6 Copies Attach F | omnussion and approved this notice showing a power approval. See a | val obtained b uch changes w dditional instr | efore drilling or recompletion vill be returned to the sender. uctions in Rules and Regula- |

| | SERVATI E, N <mark>EW M</mark> | | MMISSION | | | : | |
|-------------|-----------------------------------|------------|---|-----------------------------|---|--------------------|---|
| ntlemen: | | | | | | | |
| | | notified | that it is our | intention to commence th | c Drilling of a well to h | e known sa | |
| | | | | | | | |
| | Stat | te Brit | n e | (Company | or Operator) | | |
| | | | | | | | (Unit) The well is |
| ated | 990 | fc | et from the | North | | line and | 99feet from the |
| | ••••• | Fast | ••••• | line of Section | }, T | , R | ,, NMPM. |
| GIVE LO | CATION | FROM | SECTION LI | NE)jndestor | Pool, | عرر £eg | County |
| 1 | | | | | | | *************************************** |
| | 1 | | | man a 12 | | | *************************************** |
| D | С | В | (A) | Address | *************************************** | | *************************************** |
| | | | | We propose to drill wel | l with drilling equipment | as follows: | l-out-surface |
| | _ | _ | | | | | T OND BULLACE |
| E | F | G | H | | | | *************************************** |
| | | | | | | | •••••• |
| r | ĸ | J | ı | | | | ••••••••••••••••••••••••••••••••••••••• |
| | | | | | - | <i>*</i> | |
| | | | | | | | |
| M | N | 0 | P | We intend to complete | | | ••••• |
| | | <u></u> | | | | | fcct. |
| • | | | | | PROGRAM | .000 | ••••••••••••••••••••••••••••••••••••••• |
| _ We pr | ropose to i | ise the fo | llowing strings | of Casing and to cement t | | • | • • |
| Sise | of Hole | | Size of Casing | Weight per Foot | New or Second Hand | Depth | Sacks Cement |
| 17 | | | 13 3/8 | 1,8 | N7 | | 1 50 |
| 11 | | | 9 5/8 | 36 | New New | 316 | <u>450</u> 2700 |
| | | | 7 770 | | NCW . | 4213 | |
| | | | | | | | |
| If cha | anges in th | ae above | plans become | advisable we will notify yo | u immediately. | | |
| | - | | | recompletion give full de | | work.) | |
| | | | • | | | | • |
| | We pr | opose | to reente | r clean out to 300 | 00° set Bridge Pl | ue and name | |
| | in sa | lt sec | tion to p | roduce brine. | or por pringe it | ng and beliots | i Ce |
| | | | | | Sincerely yours, | | |
| pproved. | follows: | | *************************************** | , 19 | Sincercity yours, | | |
| Except as | 10110W3: | | | | | Company or Operate | or) |
| | | | | | Ву | Man Mil | les |
| | | _ | | | We: | ldon Miles | |
| · /^ | QII-C | ONSER | VATION CO | MMISSION | PositionOpe | ommunications rega | rding well to |
| | 11 | | | | Name | | |
| K | | | | | AddressP(|)Box 906T- | vington. New Tr |
| | | | | | . • | | * 一样 K D O D D A R E W A F |

| j in or cor | A STREETVED | <u>'</u> | | 12 | <u> </u> | | | | | | |
|------------------------|--|----------|---------------------------------------|--------------------|------------------|----------------|--|------------------------------|----------------------------|--------------------|-----------------|
| | 0157418071081 | | = | | _ | | •• | | | | |
| P/L E U.S.G.S. | | | 1 . | NEW M | | | | | COMMISSION | FORM (〇〇八)(Revi | C-103 |
| TRANSPORTER | OIL | | - Inain C | MISC | CELL | ANEUU | Sº RÊP | ORTS OF | WELLS | | |
| TO MOITARONS | FICE | | 1 | | • | • | | | 3 7 | - | • |
| OPERATOR | | L | 1573 OCL2001 | ilt to ap | propriat | B Distric | t Office | as per Con | mission Rule | Ni 08)() = | |
| ame of Com | | & T, | Inc. | | | Addre | P.O. I | 30x 906, | Lovington, | New Mexic | 0 |
| | ate Brine | , | | Well No | . Ur | A Letter | Section 1 | Township | .95 | ^{R.} 35E | |
| ate Work Pe Mav 5 = | rformed May 15, | | Pool Undes | ignate | ed | | | County Lea | | , | |
| | | | | | | : (Check | approprie | ite block) | | | |
| Beginni | ng Drilling Op | erations | | asing Te | st and C | ement Jol | > [| Y Other (E | xplain): Clea | nout | |
| Dluggin | 8 | | R | emedial ' | Work | | | | | • | |
| etailed acco | unt of work d | one, nat | ure and quantity | of mater | cials use | d, and res | ults obta | ined. | <i>U</i> . | | |
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| itnessed by | | | | Posi | | | | Company | & T, Inc. | | |
| | Weldon | Miles | FILL IN BE | | perato | | VORK BI | | | | |
| | · | | FILL IN BE | | | L WELL | | FOR IS OF | VL I | | |
| F Elev. | | TD | • | P | BTD | | | Producing | Interval | Completion D | ate |
| | | | | | | 122 | | | | | |
| ibing Diame | ter | ľ | Tubing Depth | | | Oil Stri | ing Diame | ter | Oil String | Depth | |
| erforated In | erval(s) | l. | | ,,,,, | | <u> </u> | - | <u> </u> | | , | |
| pen Hole Int | erval | | | | | Produc | ing Forma | tion(s) | | | |
| | | | | RE | SULTS | OF WOR | KOVER | | | | |
| Test | Date of Test | f | Oil Productio BPD | on (| Gas Prod MCF | | | roduction PD | GOR Cubic feet/B | Gas Well bl MCF | Potential PD |
| Before Vorkover | | | | | | | | | | | |
| After Vorkover | | | | | | | | | | | |
| | OIL CON | SERVAT | ION COMMISSIO | Ж | | I her to th | eby certif e best of | y that the in my knowledg | formation given | above is true a | nd comple |
| pproved by | 021 | | ans en | · | | Name | 7. | lon Miles | | · | |
| tle / |) c.t | | y I | | | Posit | ion | ator | | | ·· |
| ité . | <u>, </u> | <u> </u> | | | | Comp | anv | T. Inc. | | | |

FORM C-128 Revised 5/1/57

NEW MEXICO OIL CONSERVATION COMMISSION

WELL LOCATION AND ACREAGE DEDICATION PLAT

| <u> </u> | SEE IN | STRUCTIONS FOR | | | ORM ON T | HE REVI | ERSE SIDE | The desire the training of |
|--|---|---|--------------------------|-------------------------------------|-------------|--|--|--|
| Operator | | | S E C | TION A | | 1303 | CED | Well No. |
| T & T. | Inc. | | Leas | State: | Brine | ###################################### | SEP 5 | fill all 0 |
| Unit Letter A | Section . | Township 19 | | Range 35E | С | ounty | Lea | |
| Actual Footage Lo | | | | | | | | 110 % |
| 990 | feet from the | North li | ne and | 990 | feet fr | om the | | i je i je i line |
| Ground Level Elev | | ormation | Pool | | | | | Dedicated Acreage: |
| 1 | St | alado | | Uı | designa | ted | · · | 40 Acres |
| who has the rig another. (65- 2. If the answer t | ght to drill into an 3-29 (e) NMSA 19 o question one is NO I | d to produce from a 35 Comp.) "no," have the int fanswer is "yes," | erests of all Type of Co | the owners usolidation usin respect | been cons | duction et | ther for him | ("Owner" means the person nself or for himself and tization agreement or other- |
| | į ; | See original now on file. | | 1 | | | in SECTI | T& T, Inc. Weldon Miles Operator T& T, Inc. August 19, 1963 |
| | | (Termorly Fal | | Uhiq-Sta | te #1) | | | |
| | | This is a bri | ile Aett | | | | shown on plotted fr surveys n supervisi | certify that the well location the plat in SECTION B was om field notes of actual nade by me or under my on, and that the same is true ct to the best of my knowledge f. |
| | | | per-en-sul-su- | | | | | ed Professional Engineer and Surveyor |
| 0 330 660 9 | 90 1320 1650 1 | 980 2310 2640 | 2000 | 1500 /0 | 00 500 | 0 | Centinear | .c 110. |

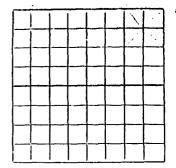
Form C-103 (Revised 3-55)

NEW MEXICO OIL CONSERVATION COMMISSION, MISCELLANEOUS REPORTS ON WELLS

(Submit to appropriate District Office as per Commission Rule 1106)

| COMPA | NY Ralph Lowe | | iress | 30x 832 | Mid | and, I | exas | | | |
|----------|-----------------------|---------------|--|---------------|--------|-------------------|--------------|--|-------------|-------------|
| : | | (Add | iress | | | | | | | |
| LEASE | Ohio State | WELL NO. | 1 1 | TINU_ | A S | 1 | T_ | 19 - S | _R_ | 35-E |
| DATE W | ORK PERFORMED | November 29 | , 1958 | boor_ | Uı | ndesign | ated | | | |
| This is | a Report of: (Check | appropriate | block) | | Resu | lts of | Test | of Cas | ing | Shut-off |
| | Beginning Drilling | Operations | | | Rem | edial 1 | Work | | | |
| [54] | Plugging | | | | Othe | r | | ·, | | |
| Detailed | account of work do | ne, nature an | d quant | ity of r | nater | ials u | sed a | nd res | ults | obtained |
| Set a | a 25 sack plug from 1 | 2,020 to 11, | 954 & 20 | O sack | plug : | from 10 | ,810 | to 10, | 780, | |
| 9,000 | 0 to 8,970 and 6,980 | to 6,930. Se | ta 15 | sack pl | ug fr | om 6,80 | 00 to | 6 , 730 . | and | |
| a 30 | sack plug from 4,286 | to 4,209. S | ct 5 sa | ck plug | in t | op of s | urfa | ce with | | |
| marko | or. | | | | | | | | | |
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| FILL IN | BELOW FOR REM | EDIAL WORK | REPO | RTSO | NLY | | | ~~~~ | | |
| | l Well Data: | | | | | | | | | |
| DF Elev | vTD | PBD | Pro | od. Int. | | | Com | pl Date | · | |
| Tbng. I | DiaTbng Dep | th(| Oil Stri | ng Dia | | Oi | l Str | ing De | pth_ | |
| Perf In | terval (s) | | | | | - | | | | |
| Open He | ole Interval | Produc | cing Fo | rmatio | n (s) | | | | | |
| RESUL' | TS OF WORKOVER: | | ······································ | | E | FFOR | E | Al | TE | R |
| late of | Test | | | | - | | | _ | | |
|)il Pro | duction, bbls. per d | lay | | | _ | | _ | | | |
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| Vater F | Production, bbls. pe | er day | | | _ | | | | | |
| ias~Oil | l Ratio, cu. ft. per | bbl. | | | | | _ | | | |
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| OH | L CONSERVATION (| COMMISSION | abov | e is tr | ue an | | | | | |
| lame_ | Leslie & (| Coments | , my Nam | knowled ie | / / | د د م <u>ت</u> | 7.1 | en e | | |
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| ıate _ | | | Con | pany | 201 r | h_Loue | | - | | |

Section 6.



NEW MEXICO OIL CONSERVATION COMMISSION Santa Fe, New Mexico

WELL RECORD

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

If State Land submit 6 Copies

Depth Cleaned Out.....

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| ame of Dri | lling Contrac | tor Love | e Drilling Co | ompany, | | | |
| ddress | B _{ox 8} | 32 , Midlan | d, Texas | | | | |
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COORD OF DRILL-STEM AND SPECIAL TI

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

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| GAS WEL | L: The | production | n during the first 24 h | ours was | | M.C.F. ol | | ···· | harrels of |
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| | | | ATTACH SEPA | RATE SHEET I | F ADDITIO | ONAL SE | ACE IS | NEEDED | |
| I he | reby swca | r or affirn | n that the information | given herewith is | a complete | and corr | ccı record | of the well and all we | ork done on it so fa |
| | | | vailable records. | | | | | | |
| | | | | | | | Do | ecember 5, 1958 | 1 |
| Company | v or One- | itor | Ralph Lous | | Addres | . Bo | ox 832. | Midland, Texa | (Date) (S |
| | , Opera | | | | | | | | |
| Name | | 5 5 5 7 | 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | | Positio | or Title. | . 1 | 16110 | |

Position or Title...........Arent

NEW MEXICO OIL CONSERVATION COMMISSION Santa Fe, New Mexico

MISCELLANEOUS NOTICES 7 3

Submit this notice in TRIPLICATE to the District Office, Oil Conservation Commission, before the work specified is to begin. A copy will be returned to the sender on which will be given the approval, with any modifications considered advisable, or the rejection by the Commission or agent, of the plan submitted. The plan as approved should be followed, and work should not begin until approval is obtained. See additional instructions in the Rules and Regulations of the Commission.

| | | Indicate Nature of Notice by C | hecking Bel | 0W | | |
|--|-------------|--|---|--------------------------------------|----------|---------------|
| Notice of Intention to Change Plans | | Notice of Intention to Temporarily Abandon Well | | Notice of Intention to Drill Deeper | ON | |
| Notice of Intention to Plug Well | X | Notice of Intention to Plug Back | | Notice of Intention to Set Liner | ои | |
| Notice of Intention to Squeeze | | Notice of Intention to Acidize | | Notice of Intention to Shoot (Nitro) | ои | |
| Notice of Intention to Gun Perforate | | Notice of Intention (Other) | | Notice of Intention (Other) | on | |
| OIL CONSERVATION COMMI SANTA FE, NEW MEXICO | SSION | Midland, Texas | •••••• | Decem | ber 5, 1 | .958 |
| Gentlemen: | | | | | | |
| Following is a Notice of Inter | ntion to do | certain work as described below a | t the | Ohio State | | •••••• |
| Ralph Lowe | |) | • | Well No1 | in | A |
| NE 1/4 NE 1/4 of Sec | or Operator | , T. 19-S , R 35-E | ,NMPM., | Undesignate | d | (Unit) Poo |
| Lea | | | | | | |
| . (0 | | L DETAILS OF PROPOSED INSTRUCTIONS IN THE RUI | | | | |
| After reaching a t | total d | epth of 12,020, testin | g & logg | ing with no sh | ow of oi | 1, |
| received verbal ap | proval | from Hobbs District o | ffice to | set 25 sack p | lug from | 1 |
| 12,020 to 11,954, | a 20 s | ack plug from 10,810 to | 0 10,780 | , 9000 to 8,97 | 0, and 6 | 980 |
| to 6930. Set 15 s | sack pl | ug from 6800 to 6730 a | nd a 30 | sack plug from | 4286 to |) |
| 4209. Set / sack | plug i | n top of surface with | marker. | | • | |
| Approved | i i ji | 5. | | 7 . h . T | • | |
| Approved | 1 175 | | | alph Lowe Company or Operate | OF | •••••• |
| i | | Ву | IM | Josephan/ | | |
| _ | | Position. | A | gent\ | | |

Send Communications regarding well to:

Box 832, Midland

Name Ralph Love

pproved

Form C-103 (Revised 3-55)

NEW MEXICO OIL CONSERVATION COMMISSION MISCELLANEOUS REPORTS ON WELLS

(Submit to appropriate District Office as per Commission Rule 1106)

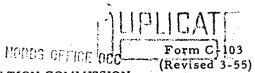
| COMPANY Ralph Lowe Bo (Add | ox 832, Midland | . Texas | · | |
|---|---|-------------|------------------|---------------------------------------|
| (Add) | ressj | 4 | * . | |
| LEASE Ohio State WELL NO. | 1 UNIT A | <u>s 1</u> | T 19-5 | R 35-E |
| DATE WORK PERFORMED August 4, 10 | 958 POOL | Undesign | ated | |
| This is a Report of: (Check appropriate b | lock) 1 R | esults of | Test of C | asing Shut-off |
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| X Beginning Drilling Operations | LIR | emedial V | Vork | |
| Plugging | | ther | | · |
| Detailed account of work done, nature and | quantity of ma | iterials us | ed and re | sults obtaine |
| August 4, 1958, this well spudded. | | | | |
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| Perf Interval (s) | _ | | | |
| Open Hole Interval Produc | ing Formation | (s) | · | |
| RESULTS OF WORKOVER: | | BEFOR | E . | AFTER |
| Date of Test | | | | |
| Oil Production, bbls. per day | | | | |
| Gas Production, Mcf per day | | | - - | · · · · · · · · · · · · · · · · · · · |
| Water Production, bbls. per day | | | , . . | |
| Gas-Oil Ratio, cu. ft. per bbl. | | | - | |
| Gas Well Potential, Mcf per day | | | | |
| Witnessed by | | | | |
| | | | Company | |
| OIL CONSERVATION COMMISSION | I hereby cert above is true my knowledg | and com | | |
| Name | Name | 1.17% | 12.00 | . / |
| Title | Position | Agent | 4 | |
| Data | ~ | | 17 | |

Form C-103 (Revised 3-55)

NEW MEXICO OIL CONSERVATION COMMISSION MISCELLANEOUS REPORTS ON WELLS

(Submit to appropriate District Office as per Commission Rule 1106)

| COMPANY | Ralph Lows | Box 8 | 32. Midlar iress) | d. | [exas | | ······································ | | | |
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| This is a P | Report of: (Check | appropriate | block) | X | Resul | ts of T | est, | of Cas | ing S | hut-off |
| В | eginning Drilling | Operations | | | Reme | dial W | ork | | | |
| P | lugging | | | | Other | | · , | | | |
| Detailed ac | count of work dor | ie, nature an | d quantity | ρf r | nateri | als us | ed an | d resi | ults | obtained. |
| A | ugust 5, 1958, 316 | ft. of 13 3/ | 8" H40-48# | ST&C | casing | was e | set a | nd ceme | ented | with 450 |
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| with 1000# | pressure for a per | iod of one ho | ur indicat | ing . | a compl | Le te si | nut o | ff had | been | obtained |
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| Open Hole | | Produc | ing Form | atio | n (s) | | | | | |
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| RESULTS | OF WORKOVER: | | | | В | FORE | £ | AF | TEF | Ł |
| Date of Te | est | | | | | | | | | |
| Oil Produc | ction, bbls. per d | ay | | | | | - | | | |
| Gas Produ | iction, Mcf per da | у | | | *************************************** | | - | | | |
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| Title | 12 | | Positio | n | Agent | / | / | | | |
| Date . | 11 | | Compa | 1117 | | U | | | | |



NEW MEXICO OIL CONSERVATION COMMISSION MISCELLANEOUS REPORTS ON WELLS: 07 (Submit to appropriate District Office as per Commission Rule 1106)

| COMPANY_ | Ralph Lowe | | | Midland, | Texas | | | | -7 : | |
|--------------|------------------|----------------|--|-------------|-----------------------------|-------------|-------------|-------------|-----------------|-------------|
| | | (Ac | ddress |) | | | | | | |
| LEASE Ohi | o State | WELL NO. | · <u>1</u> | _UNIT_ | A S | <u> </u> | T · | 198 | _R | 35-E_ |
| DATE WOR | K PERFORMED | August 20. | 1958 | _POOL | Undes | ignated | d | | | |
| This is a D | | | | | ==== | - C M | | | | |
| ints is a Re | eport of: (Check | c appropriate | s prock | نا (| Resul | ts of T | est o | ı Ças | ing 5 | uat-oii |
| Be | ginning Drilling | Operations | | | Reme | dial Wo | ork | | | |
| Plu | igging | | | | Other | | | | | |
| Detailed acc | ount of work do | one, nature a | nd qua | ntity of | materi | als use | d and | res | ults c | btaine |
| | | 4 4 " - | | | | | | | | |
| August 20, | 1958 set 4275' | of 9 5/8 36#J | -55 ST& | kC casin | g and ce | mented | with | 2500 | sacks | 6% |
| cement 1/4 | Flow Seal and 20 | 00 sacks neat | that c | irculate | ed. Aft | er sett | ing 2 | 24 hou | ırs ca | sing |
| was tested | with 1200# press | sure for a per | riod of | one ho | ur indic | ating a | comp | lete | shut | off |
| had been ob | tained. | | | | | | | | | |
| | | | | | | | | - | | |
| | | | | | | | | | | |
| | | ٠ | | | | | | | | |
| | | | | | | | | | | |
| FILL IN BE | LOW FOR REM | EDIAL WOR | KREF | PORTS | ONLY | | | | | |
| Original We | | | | | | | | | ÷ | |
| DF Elev. | | PBD | P | rod. In | t. | С | ompl | Date | | , |
| Thng, Dia | Tbng Dep | oth . | Oil St | ring Dia | a . | Oil | Strin | g De | oth | |
| Perf Interv | al (s) | | - | | | | | | | |
| Open Hole I | nterval | Produ | ucing I | Formati | on (s) | | | | | |
| RESULTS C | F WORKOVER | | ······································ | : | ВІ | FORE | | AI | TER | |
| Date of Tes | | | | | | | | | | |
| | ion, bbls. per | dav | | | | | | | | |
| | tion, Mcf per d | • | | | | | | _ | | |
| | uction, bbls. p | | | | | | | | | |
| | tio, cu. ft. per | | | | , | | | | | |
| Gas Well P | otential, Mcf pe | er day | | | | | | | | |
| Witnessed b | oy | | | | | | | | | |
| | | | | | | | omp | | | |
| OIL CO | ONSERVATION | COMMISSION | N ab | | ertify t rue and edge | | | | | |
| Name | 1. Show | Mich Com | .5 | ime | | 1Jan | Cou | | | |
| Title | | | Po | sition | Ågent | (/_ | | | | |
| Date . | · / · | | Co | ompany | D 4 1 3 | | | | | |

LICO OIL CONSERVATION COMP TON Santa Fe, New Mexico

| ; 1 | 1 | ŧ | 4 | î † | | |
|-----|--------------|----|------------|-----------|------|--|
| Re | Form vise | C. | -1((1: |)] 2/: | 1/55 | |

| | | | ron | ICE OF INTER | NTION TO DR | ILL ^{COBS} OFF | 100 |
|-----------------------|----------------------|-------------------|--|--|--|---|---|
| begins. If o | changes in notice in | the prop QUINT | the District O osed plan are UPLICATE. | ffice of the Oil Conservations of the Oil Conservation of the Considered advisable, a conservation of the Copies Att | on Commission and appropriately of this notice showing local following approval. See | oval obtained before such changes will lead to additional instruction | e drilling or recompletion be returned to the sender ons in Rules and Regula- |
| | ••••••••••• | Nid | land Tex | 1.8 | Ju | 1y 28, 1958 | |
| OIL CON | SERVATIO | ON COM | MISSION | | | | |
| SANTA FI | • | EXICO | | • | | | |
| You a | re hereby | notified t | that it is our | intention to commence the | Drilling of a well to be | known as | |
| | | | | | or Operator) | | |
| | Ohio | State. | (Lease) | | ., Well No1 | , in | A The well is |
| located | 990 | fe | et from the | East | | line and | 990 feet from the |
| (GIVE LO | CATION | FROM S | SECTION LI | | nd Gas Lease is No | Lea 2253 | County |
| D | C | В | A | Address | | | ••••••• |
| ļ | | | | We propose to drill well | with drilling equipment a | s follows:Retar | Y |
| E | F . | G | Н | The status of plugging | bond is\$10,000.00E | lanket Form.3 | 9-A-1 |
| r | K | J | I | Drilling Contractor L | owe Drilling Compa | ıny | ······································ |
| M We p | N N | O | P P | We intend to complete | this well in theDevoi | ıian | · · · · · · · · · · · · · · · · · · · |
| | of Hole | 1 | Size of Casing | Weight per Foot | New or Second Hand | Depth | Sacks Cement |
| 1 | 7 | | 13-3/8 | 50 | New | 350 | Circulate |
| | -1/4 | | 9-5/8 | 40 | New | 4350 | Circulate |
| | 8-3/4 | | 5-1/2 | 20 | New | T.D | 1000 |
| | _ | - | | advisable we will notify yo recompletion give full de | | work.) | · |
| | | | pu pro | | Sincerely yours, | | · : |
| Approved Except as | | ••••• | | | By // Z | H LOWR (Company of Operator) | r) |
| | OIL C | ONSERV | VATION CON | AMISSION | PositionAG Send C | onmunications regar | ding well to |
| ву. О 9 | my, | 3 | Juch | <u>/</u> | NameRALPH-LO | | |

Name....RALPH-LOWE Address Box # 832, Midland, Texas

One CMEXICO OIL CONSERVATION COMMING SUCN Well Location and Acreage Dedication Plat Superior HOBBS 057105 00 Section A. Ohio - State 350 UL 279 PM RALPH LOWB Lease Operator Range_ 35-E Township 19-5 1 Unit Letter A Section_ **NMPM** Well No. 990 Feet From 990 Feet From North Line,_ Located Line County___Lea___ G. L. Elevation 3830 Dedicated Acreage 440 Acres Pool Undesignated 2/1/1/11/11 Name of Producing Formation Devenian Is the Operator the only owner* in the dedicated acreage outlined on the plat below? Yes Yes No 1990年 - 1990年 If the answer to question one is "no," have the interests of all the owners been consolidated by communitization agreement or otherwise? Yes____No_____ If answer is "yes," Type of Consolidation_ If the answer to question two is "no," list all the owners and their respective interests below: Land Description Owner Section.B This is to certify that the information in Section A above is true and complete to the best of my knowledge ' 9901 and belief. RALPH LOWE " (Operator) (Representative) AGENT Bex 832 Midland, Texas. SECTION 1, T-19-S, R-35-E Address LEA COUNTY, NEW MEXICO This is to certify that the well location shown on the plat in Section B was plotted from field notes of actual surveys made by me or under my supervision and that the same is true and correct to the best of my knowledge and belief. Date Surveyed 7-25-58 Registered Professional Engineer and/or Land Surveyor.

2000

1000

INSTRUCTIONS FOR COMPLE

- 1. Operator shall furnish and certify to the information called for in Section A.
- 2. Operator shall outline the dedicated acreage for both oil and gas wells on the plat in Section B.
- 3. A registered professional engineer or land surveyor registered in the State of New Mexico or approved by the Commission shall show on the plat the location of the well and certify this information in the space provided.
- 4. All distances shown on the plat must be from the outer boundaries of Section.
- 5. If additional space is needed for listing owners and their respective interests as required in question 3, Section A, please use space below

* "Owner" means the person who has the right to drill into and to produce from any pool and to appropriate the production either for himself or for himself and another. (65-3-29 (e) NMSA 1953 Comp.)

W. W. STUDDERT

AMERICAN SOCIETY OF CIVIL ENGINEERS

STUDDERT ENGINEERING CD.

HOBBS OFFICE O CONSIANA MONTANA ARIZONA

REBISTER & LAND SURVEYORS

1000 UL 27 PM 1 DKLAHDMA HATU WYDMING

MUTUAL

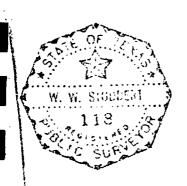
CIVIL ENGINEERS 221 SOUTH COLORADO MIDLAND, TEXAS

| , 35 | CITY SERVICE | E SHELL | 36 | 31 |
|----------|--------------|--|--------------|---------------|
| 2 | 1 0410 | RALPH LOWE | | 6 |
| | - - | GROUND LEVEL AT | 990 ' | LOWE |
| ATLANTIC | | #1 RALPH LOWE-STATE IS 33.7 FEET LOWER THAN THE DERRICK FLOOR LEVEL ON PURE OIL CO # 2-35 SEC 35 T R | | SHELL |
| | | | | N |
| | | SHELL | | $\frac{N}{2}$ |
| | SECT | ION I T-19-S R-35-E EA COUNTY N M | | |
| ATLANTIC | | | | SHELL |
| | | | | |
| | | | | |
| 2 | 1 | STATE | 1 | SCALE 1"-100 |
| 11 | | ATLANTIC | 12 | 17 |

W W STUDDERT, CIVIL ENGINEER AND SURVEYOR HEREBY CERTIFIES THAT THIS WELL LOCATION WAS STAKED ON THE GROUND UNDER HIS SUPERVISION AND THAT THIS PLAT IS TRUE AND CORRECT

W W STUDDERT

JULY 21 1958



| STATE OF NEW MEXICO | 42) |
|--|--|
| OIL CONSERVATION DIVISION DISTRIBUTION P. O. BOX 2088 | Form C-103 Revised 12-1-7 |
| SANTA FE. NEW MEXICO 87501 | State X Fac |
| SUNDRY NOTICES AND REPORTS ON WELLS | 5. State Cit & Gas Lease No. LG-1437 |
| L X WELL OTHER- | 7, Unit Agreement Name |
| Moco Production Company ress of Operator | State "NO" |
| P. O. Box 68 - Hobbs, NM 88240 | 1 10. Field and Pool, or Wildcar |
| West LINE, SECTION 7 TOWNSHIP 19-S NAME 36-E NAME. | Wildcat Bone Springs |
| 15. Elevation (Show whether DF, RT, GR, etc.) 3817.53 GL | 12. County Lea |
| Check Appropriate Box To Indicate Nature of Notice, Report or Other Notice of Intention to: Subsequent | her Data REPORT OF: |
| M PEMEDIAL WORR PLUC AND ABANDON X REMEDIAL WORR COMMENCE DRILLING OPHS. OR ALTER CASING CASING CASING TEST AND CEMENT JOB OTHER | ALTERING CASING PLUG AND ABANDONNIENT |
| Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including | estimated date of starting any proposes |
| ropose to plug and abandon the subject well per the following: | |
| Move in service unit and release packer set at 9,045' and pull tubing ap with 35' of Class C Neat cement. Spot 25 sx of Class C Neat ceme (Top of Bone Springs formation is at 7,320'). Spot 25 sx of Class C 5,150'. Pull tubing and RIH with 3-1/8" hollow carrier casing gun. With 4 SPF and 90° phasing. RIH with tubing and packer. Set packer read and establish the with 10 ppg brine water. POH and RIH with tube set retainer at 4,050' and cement squeeze with 50 sx of Class C Neat 1-5/8" casing at 4,050'. Spot 25 sx of Class C Neat cement from 2100 class C Neat cement from 600' to 350'. Spot 15 sx surface plug of C abandonment marker and cap well. Clean location. | Neat cement from 5,400'- Perforate 4,200'-4,202' at 4,050'. Open braden- bing and cement retainer cement to tie back insid 0'-1850'. Spot 25 sx |
| pte: Mud will be placed between all plugs using salt gel mud consist 25# gel/100 bbls water. ***Need to pull $5\frac{1}{2}$ and plug or per | - |

0+5 - NMOCD Hobbs

- J.R. Barnett Houston, Rm. 21.156

10 1484

1 - CMH

1 - F.J. Nash
1.156 Houston, Rm. 4.206

mplete to the best of my knowledge and belief.

Administrative Analyst

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT

| we. of Cortes SCCEIVES | 1 | |
|------------------------|---|---|
| MOITUBIRTEID | | |
| SANTA FE | 1 | |
| FILE | | |
| U.S.G.S. | | |
| LAND OFFICE | | |
| OPPRATOR | | · |

OIL CONSERVATION DIVISION

| • | אסודעטוא דצום | | | • Р. | O. BOX 2088 | • | • | Form C-103 Revised 10-1- |
|-------|----------------------------------|--|------------------------|-----------------------|-------------------|---------------------------------------|----------------------------|-----------------------------|
| | SANTA FE | | | SANTA FE | NEW MEX | ICO 87501 | | KE41254 1941- |
| | U.S.O.S. | | | | | | 5a. Indicate T | |
| 1 | LAND OFFICE | | | | | | | Gas Lease No. |
| | OPERATOR | |) | | | | LG-14 | |
| 1 | 7 EINT 3EU TON 00) | SUNDR | Y NOTICE | S AND REPOR | TS ON WELL | S C DIFFERENT RESERVOIR. SALS.) | | |
| 1. | oil X GAS WELL | . 🗆 | OTHER- | | | | 7. Unit Agreen | nent Name |
| | AMOCO PRODUCTION | ON COMP | ANY | | | • | 8. Form or Lea | |
| 3. Ac | Idress of Operator | | | | | | 9. Well No. | |
| | P. O. Box 68, 1 | Hobbs, | New Mexi | co 88240 | | | 1 | D |
| 4. L | ecation of Well | 1 | 980 | LET FROM THE | North | . 660 | Wildcat F | Bone Springs |
| 1 | UNIT LETTER | | F1 | | | AND FEET PR | 177777 | |
| | West | LIHE, SECTIO | эн <u> </u> | TOWNSHIP | 19-S | NAMES 36-E | ··· () | |
| 11: | | | 11112. | 5. Elevation (Show | | , GR, etc.) GL | 12. County | |
| 10. | | 777777 | 77777 | | ··· | | Lea | |
| | NOTE | | Арргоргіа: чтентіон | | cate Nature | of Notice, Report or | Other Data INT REPORT O | |
| | NOTI | CE OF IN | NIENTION | 10: | | 20825005 | NI REPORT O | r: |
| PCR: | FORM REMEDIAL WORK |] | | PLUG AND ABAND | OH AEMED | DIAL WORK | ALT | TERING CASING |
| TEM | PORARILY ASAHOON | | 71. | | COMME | ENCE DRILLING OPHS. | PLU | IG AND ABAHDONMENT 🛛 |
| PUL | L OR ALTER CASING |] | | CHANGE PLANS | CASING | TEST AND CEMENT JOB | | _ |
| | | | | | OT H | HER | | L |
| • | THER | | | <u></u> | | ` | | |
| | Describe Proposed or Co | ompleted Op | erations (Cl | early state all perti | nent details, and | l give pertinent dates, includ | ing estimated date | of starting any propose |
| | | Dalasco | nackon | and tubing | Pan cast | inon buidaa nlua | | 01.00 |
| | Misu o-u-o4. P Canned with 35 | ' cemen | t and to | and tubing. | to 1000 PS | iron bridge plug SI and held OK. R | and set at s | 1100.° |
| | cement at 9065 | '. Pul | led tubi | na to 7400' | and spotte | ed 25 sx class C n | eat 5400'-51 | ia tayyea Isni |
| | Pulled tubing a | and per | fed 4200 | '-4202' with | 1 4 SPF. (| Circulate. Ran ce | ment retains | er and |
| _ | set at 4050'. | Spotte | d 50 sx | class C neat | below ret | tainer. Pulled tu | bing and per | rfed . |
| | 2100'-2101' wit | th 4 SP | F. Circ | ulate. Ran | cement ret | tainer and set at | 1850'. Pumr | 425 sx |
| | class C neat ar | nd circ | ulate 94 | sx. Pulled | l tubing to | o 600' and spotted | 25 sx class | s C neat |
| | | | | | ed 15 sx c | class C neat to su | rface. Cut | off |
| ľ | wellhead and in | nstalle | d dry ho | le marker. | | | | |
| | | • | | | | | | |
| 8 | | | | | | | | |
| • | | | | | | | | |
| _ | 0+5-NMOCD,H 1- | -J. R. I | Barnett, | HOU 21.156 | 1-F. J. N | Nash, HOU Rm. 4.20 | 6 1-BFC | |
| 1 | | | | | | | | |
| } | _ | | | • | | | | |
| | • | | | | | • | | |
| | | | | | | | | |
| 18.1 | hereby certify that the | information | above is tru | e and complete to t | he best of my kne | owledge and belief. | · | |
| 1 | Thou L | 2 /1. | Q. | | A | | | |
| .1640 | VIIUTA | y cov | u | TIY | Admir | nistrative Analyst | DATE | 3-13-84 |
| | | 17/1 | 1 | / | CIT | GAS INSPECTO | OR | 4 : 3007 |
| Ì | (Africalla | 11:11 | to the | | | Pasin mintra | DE.O | 014 mm |
| | OVED ROLLING 166 | <u>, </u> | 11:701 | | · • | | | |

EXHIBIT #10

INJECTION VOLUME SUMMARY

| I. | <u>1986</u> | 19,982 barrels brine |
|-----|-------------|-----------------------------|
| | | 108,965 barrels fresh water |
| | <u>1987</u> | 4,350 barrels brine |
| | (June) | 5,250 barrels fresh water |
| | | |
| II. | <u>1986</u> | 138,628 barrels brine |
| | | 60,781 barrels fresh water |
| | 1987 | 72,315 barrels brine |
| | (June) | 42,970 barrels fresh water |

| | | Buckeye | Carlshal | Hobks |
|---|--------------|---------------|--|---------|
| | .1982 | | | |
| | 4th Quarter | 18,455 | 12,745 | 70,690 |
| | 3rd Quarter | 11,095 | 87,570 | 46,462 |
| | 2nd Quarter | 32 145 | 115 825 | 54,944 |
| | 101 Quarter | 158,014 | 131,935 | 35,205 |
| | | | | |
| | | | | - |
| | .1981 | | | |
| | 1st Quarter | 87,143 | 18,872 | 76,251 |
| | 2 nd Quarter | 729,28 | 104,507 | 70,094 |
| | 3rd Luarter | 17442 | 121,751 | 86,186 |
| | 4th Zuarter | 34,735 | 118,853 | 104,015 |
| | | | # 1000 COMP TANK TO # \$ \$ \$ 1 M . \$ 1 T. | |
| | | | | |
| | 1985 | | | |
| | 3rd Quarter | 41,405 | 66945 | 41465 |
| | 2nd Quarter | 24,683 | 54895 | 114455 |
| | 1st Quarter | 20,059 | 51980 | 100,569 |
| - | 4th Quarter | 49,292 | 44613 | 7 5,837 |
| | | | | |
| | | | | |
| | 1984 | | e dE i em | |
| | 4th Quarter. | <i>51,255</i> | 54515 | 101,534 |
| | 3rd Quarter | 22,058 | 82930 | 35,874 |
| | 2nd Quarter | 17,671 | 48321 | 38,303 |
| | 10+ Quarter | 12,428 | 3 8, 6.48 | 19517 |
| | | | • ••• | |
| | | | | |
| | 1983 | | 401 / AF | 101-71 |
| | 4th Quarter | 14,120 | 47,625 | 103,771 |
| | 3rd Zuarter | 31,081 | 49 460 | 86,144 |
| | 2nd zuarter | 35 798 | 52,590 | 48,186 |
| | 1st Quarter | 30,013 | 37,155 | 47,051 |

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| ! | Buckeye | Carlstad | Holls |
|---------------------------------|--|---------------------------------------|---------|
| 1980 | - Maring | | 712002 |
| 1st Quarter | 119266 | 74,926 | |
| 2nd Quarter | 141,011 | 101,135 | |
| 3rd Quarter | 105, 895 | 74,148 | 28821 |
| 4th Quarter | (el, 323 | 127,008 | 13.845 |
| | | | |
| 1070 | | | |
| 1979 1 st Quarter | 112 215 | 05 12 | * * |
| _ | 123,315 | 95,123 | |
| 2rd Quarter | | 47.315 | |
| 3rd Quarter | 106, 354 | | |
| 44 Quarter | 125,953 | 92,.926 | • •• |
| | | | |
| | | | - |
| 1978 | | | |
| 1 Quarter | 52,006 | 181,570 | |
| 2ª Quarter | 5,475 | 75,404 | |
| 3rd Quarter | le4, 190 | 141,337. | |
| Hy Quarter | 96,741 | 98,178 | |
| - 477 | | · · · · · · · · · · · · · · · · · · · | , |
| 15 Quarter | 42,032 | 50, 292 | |
| 2nd Quarter | 40,184 | 72,325 | |
| 3rd Quarter | 43, 353 | 107,120 | |
| Hy Quarter | 94,830 | 77,092 | • |
| 1974 | | | |
| 15 Duarter | 11 (25 | | **** ** |
| 2rd Quarter | 11,535 | | . 100 |
| 3 & Quarter | 20,667 50,492 | ~0 d 8 | |
| 44 Oweter. | | 5,938 | |
| T- Suprice. | 27.625 | 38,090 | |
| | e age candidate extra control of the second data sec | 1 | |
| | A ATTACA SE ATTA | | |
| | a company of the same of the contract of the c | | ••• |

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| | | | Buckeye | Carlsbad | Holils |
|---------------------------------------|-------------------------|--------|----------|---------------------------------------|--------|
| | 1975 | | | | |
| | 1st Quarter | | 18,554.5 | | |
| : | 2 ed Quarter | | 17,625 | | |
| • | 3 rd Quarter | | 22,973 | | |
| • | 4th Quarter | | 13,629 | | |
| | | • | | | |
| , . | 1974 | | | | |
| : | 4th Quarter | | 55,218 | e e e e e e e e e e e e e e e e e e e | |
| | 3ed Quarter | ·• · · | 22,753 | | |
| | 2rd Quarter | | 16,142 | • | |
| | 15t Quarter | | 15632 | | |
| : | I- between | | 7,03% | | |
| · · · · · · · · · · · · · · · · · · · | 1973 | | | | ÷ |
| : | 4th Quarter | | · | | |
| •• | 3rd Quarter | | 14,055 | ., | |
| | 2rd Quarter | | 9,2/1 | | |
| | 1st Quarter | | 21,968 | | |
| | 1- marier | | 10,707 | | |
| | | | | | |
| , | <u> 1972</u> | | | | |
| · · | 44 Quarter | | 20,527 | • • | |
| 1. | 3ª Quarter | | 83,389 | · | |
| • • | 2nd Quarter | | 109,814 | | |
| • | 1st Quarter | | 129,120 | | |
| | •• | • | | | |
| | 1971 | | | | |
| | 4th Quarter | | 90,7/2 | | |
| * | 3rd Quarter | | 41,538 | | • |
| | Ind Querter | • | 54.56.3 | | • |
| | 1st Quarter | • | 47,545 | | |
| 1 | • • • • • | 1. | | | |

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| : | Buckeye | Carlshad | Hoble | • |
|--|---------------------|---------------------------|---------|---------------------------------------|
| 1970 | • | | | |
| 4th Quarter | 17.924 | | | |
| 3rd Quarter | 47,054 | | | |
| 2nd Ruarler | 44,079 | | | |
| 1st Quarter | 7,720 | | | |
| | | | | |
| 1969 | | | | |
| 4th Quarter | 29,265 | | | |
| 3rd Quarter | 13, 100 | | | |
| 2rd Quarter | 18,475 | | | |
| 15 Quarter | 12.702 | | • | |
| | | | | |
| 1968 | | | | ., |
| ## Quarter | 20.894 | | | |
| 3 td Quarter | 23, 1 97 | | | |
| 2rd Quarter | 30,921 | | | |
| 1st Quarter | 22.665 | | • | |
| Picnux - M42 Total Liarul al Buckeys, Lu. 1985 - 3. | surving at | er Brinaull Yan 1968 - | Chran 3 | 529 |
| Finded Ownica | e Corp. m1926 | 04 | | |
| pelal liarrels | for Iruckers | Brunciell at | - | |
| Carlobad, sta | iling, at July | 1. 1976 strue. | | |
| Dec. 1985 - 3,103 | | an ann an an an | - | |
| ill iden Creciat | wal die 411-1 | 7739 | | · · · · · · · · · · · · · · · · · · · |
| Retal Liarrels. | for Suches | Bruncock int | | |
| Heldo, starti | | | | |
| Dec. 1985 - 1,49 | 73,276. BBIs. | • | | |

EXHIBIT #11

DISCHARGE PLAN SIGNATORY REQUIREMENT

In response to Item 5-101-H, Discharge Plan Signatory Requirement, Unichem International herein submits the following:

5-101 DISCHARGE PLAN AND OTHER REQUIREMENTS:

H. (1a) For a Corporation: By a principal executive officer of at least the level of vice president, or a representative who performs similar policy-making functions for the corporation who has the authority to sign for the corporation...

Richard Brakey functions as a Vice President of Unichem International and is authorized to sign for the company in reference to the Discharge Plan Signatory Requirement. Mr. Brakey's signature is contained herein:

Richard Brakey, Vice President Unichem International Inc.

TRUCKERS #1 BRINE STATION

Discharge Plan Permit Submittal #3

December 11, 1987





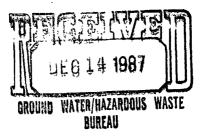
TRUCKERS #1 BRINE STATION

DISCHARGE PLAN PERMIT SUBMITTAL #3

Presented to:

STATE OF NEW MEXICO

Environmental Improvement Division



UNICHEM INTERNATIONAL INC. P.O. BOX 1499 HOBBS, NEW MEXICO 88240

Prepared by:

Wayne Price, Staff Engineer



Home Office 707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, TWX 910/986-0010

December 11, 1987

VIA CERTIFIED MAIL: P 241 450 313

John Parker, Water Resource Specialist Ground Water Section State of New Mexico Environmental Improvement Division P.O. Box 968, Runnels Building Santa Fe, NM 87504-0968

SUBJECT:

Truckers #1 Brine Station - Hobbs, New Mexico

Discharge Plan Submittal #3

Dear Mr. Parker:

The information contained herein is provided in response to the comments and information requests outlined in your letter of 2 November 1987.

Comment No. 1:

The Discharge Plan Signatory Requirement (Exhibit 11) lacks the certification: "I certify under penalty of law..." which should precede signature (5-101.H.2.).

Response:

Please refer to Exhibit #1, which represents the amended Discharge Plan Signatory Requirement in compliance with 5-101.H.2.

Comment No. 2:

The number of wells within the area of review and the status of these wells is difficult to determine for the Truckers #1 Brine Station. There appears to be more than two wells listed in Exhibit 8; however, the penciled-in legend at the top of the page states that the two wells are listed twice, even though the location for at least one of the wells is different. Please clarify (5-203.A.).

Response:

Please refer to Exhibit #2 for clarification of the actual wells and well locations within the area of review. The documenting information, as well as

UNICHEM INTERNATIONAL INC.

Mr. John Parker Page Two December 11, 1987

the accompanying plat, has been provided by Mr. Delbert W. Nelson, District II Supervisor with the State Engineer's Office in Roswell.

Comment No. 3:

In order to determine the existence of possible conduits for fluid movement, an integral aspect of the Part V MIT requirements, Unichem International must commit to performing a cement bond log at some point during the five-year renewal period (5-204.B.2. and 5-205.A.4.b.).

Response:

This requirement has been noted and compliance agreed to. A cement bond log will be performed at some point during the five-year renewal period for Truckers #1.

Comment No. 4:

Unichem International needs to make a commitment to notify this office "prior to commencement of drilling, cementing and casing, well logging, mechanical integrity tests and any other well workover..." (5-205.A.5.).

Response:

Unichem International will notify the EID's office prior to any drilling, cementing and casing, well logging, mechanical integrity tests and any other well workover as required in Section 5-205.A.5. Per my telephone conversation with you, emergency work will be reported to the EID's office by telephone at the earliest possible time.

Comment No. 5:

Please provide a comparison of fracture pressure for salt at injection interval (approximately 2,100 feet) with the down-hole pressure resulting from the maximum operating pressure (300 psi for Truckers #1, 450 psi for Truckers #2) (5-206.A.1.).

Response:

Please refer to Exhibit #3. Steve Reed, Hydrologist with Reed & Associates, Inc., has prepared the response for this comment.

Comment No. 6:

Please provide a letter of authorization for Wayne Price so as to comply with report signatory requirements (5-208.C.1.).

Response:

Wayne Price is the Staff Engineer working for Unichem International and has

Mr. John Parker Page Three December 11, 1987

been duly authorized to gather and prepare any and all information necessary to provide compliance with Part V of the EID's Water Quality Control Commission (WQCC) Regulations for Truckers #1 Brine Station. He has full responsibility for coordinating all efforts for the purposes specified herein.

Richard Brakey, Vice President Unichem International Inc.

Comment No. 7:

Unichem International needs to submit a plugging and abandonment plan for our review. This plan should also include decommissioning of surface facilities. Copies of the blanket plugging/surety bonds submitted for Truckers #1 and #2 (Exhibits 6 and 3 respectively) have been forwarded to our Legal Bureau for review. Please submit documentation that demonstrates the \$50,000 sum of each bond is adequate to properly plug and abandon the brine wells (5-209.A.).

Response:

The following information represents a detailed breakdown on the cost that would be incurred by Unichem International if the brine well required plugging and removal of all associated equipment. Also included is an estimate for the provision of soil removal (if required); however, the cost involved in the event of ground water contamination has not been included.

DETAILED ESTIMATE

Oilfield service unit (pulling unit):
--pull tubing; re-enter hole and set
bridge plug; cement pump truck (stand-by
time required - 1/2 day)

\$ 750.00*

Oilfield service unit (pulling unit):
--re-pull tubing; re-enter hole and set
bridge plug near surface (if required);
cement pump truck (stand-by time required 1/2 day)

750.00*

750.00*

Oilfield service unit (pulling unit):
--pull remaining tubing; dismantle well
head; set P&A marker (1/2 day time required)

*The above prices were quoted by X-Pert Well Service Company located in Hobbs, New Mexico.

Mr. John Parker Page Four December 11, 1987

DETAILED ESTIMATE (Continuation...)

Two 7-5/8" bridge plugs at \$1,500

\$ 3,000.00*

*Price quoted by Packer Sales & Rental located in Hobbs, New Mexico.

Set two 200' cement plugs above bridge plugs using Class C neat cement (includes cement cost, time and labor for pump truck and driver

\$ 1,958.00*

*Price quoted by Dowell-Schlumberger located in Hobbs, New Mexico.

Consulting engineer at \$100/hour (8 hours)

800.00

Remove and relocate the following a total distance of 20 miles:

| · | \$ 2,500.00 |
|---|----------------|
| three 400 bbl tanks | |
| 300' miscellaneous pipes and valves | \$ 100.00 |
| one pump and house | \$ 250.00 |
| miscellaneous electrical conduit | |
| and wire | \$ 350.00 |
| three-phase power service (power company) | N/C |
| | \$ 1,500.00 |

Remove 5% top soil:

| $300' \times 300' \times .05 = 4,500 \text{ ft3 or}$ | |
|--|----------------|
| 166 yards @ \$10/yard | \$ 1,666.00 |
| dump truck and loader | |
| (2 days @ \$80/hour) | \$ 1,280.00 |

TOTAL ESTIMATED COST:

\$ 15,654.00**

**Unless specified as a quote, all figures listed are in accordance with the 1987 National Construction Estimates.

Please note that the average P&A cost experienced by Arco Oil & Gas in Hobbs, New Mexico, has been approximately \$5,000 for shallow wells (0'-3,000'); the approximate cost experienced by Chevron USA Inc., also located in Hobbs, has been in the range of \$10,000-\$20,000. Therefore, the figures provided for the detailed breakdown reflect a worst case condition scenario.

Comment No. 8:

Maps submitted for Truckers #1 and #2 depicting area of review lack reference

Mr. John Parker Page Five December 11, 1987

scale. Please submit maps including scales and with the 1/4 mile area of review drawn in (5-210.B.2.).

Response:

Please refer to Exhibit #4 for the map including the scale and 1/4-mile area of review. For reference purposes, the map and scale are directly proportional in size.

Comment No. 9:

Please provide maps showing vertical and horizontal limits of all ground water having less than 10,000 mg/l TDS (5-210.B.5.). Also, we need water quality information for water-bearing formations penetrated by brine well (3-106.C.3.).

Response:

Please refer to Exhibit #3. Steve Reed, Hydrologist with Reed & Associates, Inc., has prepared the response for this comment.

Comment No. 10:

Please provide generalized and specific maps and cross-sections depicting both the regional and site-specific geology (5-210.B.6. and 7.).

Response: Please refer to Exhibit #3. Steve Reed, Hydrologist with Reed & Associates, Inc., has prepared the response for this comment.

Comment No. 11:

Please provide a detailed contingency plan which at a minimum addresses: surface spills of brine and loss of mechanical integrity in the injection well (5.210.B.15.).

Response:

Unichem International's in-house contingency plan to address surface spills of brine and loss of mechanical integrity in the injection well includes the following:

Surface Spills:

Surface spills will be immediately removed from the area and the cause of the spill remedied. The brine station is designed to minimize any such spills and the issue has already been addressed by the design factor.

To enhance protection of the area involved, the station is monitored on a daily basis. In the event of a surface spill, the station will be shut down to prevent any further spills and/or leaks leading to movement of fluids into the ground water. Unichem will notify the

Mr. John Parker Page Six December 11, 1987

EID and comply with all rules and regulations set forth by the WQCC for such an event.

As previously indicated, Unichem will perform clean-up of the affected area in a timely fashion per the EID's recommendations.

Mechanical Integrity:

Unichem International maintains routine pressure and flow information in order to determine the potential loss of mechanical integrity. Additionally, routine mechanical integrity tests are performed to determine loss.

In the event that loss of mechanical integrity occurs, the well operations will be shut down immediately and the EID notified accordingly. The primary concern in the event of mechanical integrity loss will be the removal of pressure at the well head to prevent the potential of migration of well fluids into the ground water. The well will then be evaluated and subsequent repair(s) performed as necessary.

Unichem International will comply with the rules and regulations applicable to the movement of fluid into the ground water and will also comply with recommendations from the EID with respect to clean-up procedures as deemed necessary.

If you have any questions regarding the responses provided herein or the accompanying material, please do not hesitate to contact me.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price Staff Engineer

LWP:mms

Enclosure

EXHIBIT #1

AMENDED DISCHARGE PLAN SIGNATORY REQUIREMENT

In response to Item 5-101-H, Discharge Plan Signatory Requirement, Unichem International submits the following:

5-101 DISCHARGE PLAN AND OTHER REQUIREMENTS:

H. (1a) For a Corporation: By a principal executive officer of at least the level of vice president, or a representative who performs similar policy-making functions for the corporation who has the authority to sign for the corporation...

Richard Brakey functions as a Vice President of Unichem International and is authorized to sign for the company in reference to the Discharge Plan Signatory Requirement. Mr. Brakey's signature is contained herein:

I 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.

Richard Brakey, Vice President Unichem International Inc.



STATE OF NEW MEXICO

STATE ENGINEER OFFICE

ROSWELL

S. E. REYNOLDS STATE ENGINEER DISTRICT II

909 E. 2ND STREET

P.O. BOX 1717

ROSWELL, NEW MEXICO 8820

December 1, 1987

Files: L-3945; L-5434

EXHIBIT #2 (TRUCKERS #1)

Unichem International P. O. Box 1499 Hobbs, NM 88240

Attention: Wayne Price

Gentlemen:

Our records indicate that well L-3945, permitted for the SWANEANEA of Section 1, Township 19 South, Range 35 East, was drilled July 29, 1958 and plugged according to plugging record filed August 24, 1959. Permit was granted June 21, 1963 to re-enter and use this well for drilling operation by T & T Incorporation under file No. L-3945 (2) and all authorized use under this filing terminated June 21, 1964.

Our records also indicate that well L-5434 is located in the SW4NE4NE4 and well L-5434-S in the SE4NW4NE4, both in Section 1, Township 19 South, Range 35 East. Attached is plat showing locations of these two wells.

Yours very truly,

Delbert W. Nelson

District II Supervisor

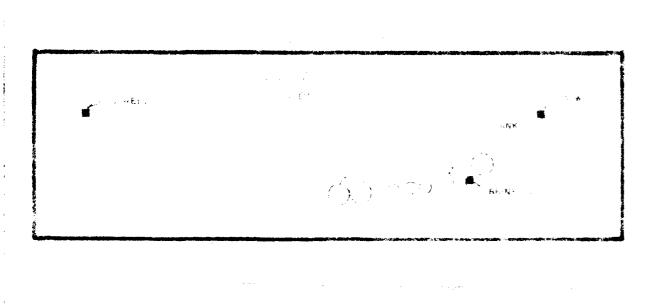
DWN/fh Encl.

cc: Santa Fe

PLAT OF UNDERGROUND WATER PROJECT TO ACCOMPANY ENGINEER'S REPORT ON (AMENDED) APPLICATION TO APPROPRIATE UNDERGROUND WATER OF THE LEA COUNTY SHALLOW GROUND WATER BASIN

PERMIT NO L-5434 & L-5434 ENLARGED

PIONEER WATER CO., INC. PERMITTEE



- GREAS OFFINE WHICH WATER HAS BEEN BENEFIC ALLY APPLIED UNDER THE TERMISIONS OF THE FIRST ARE DESCRIBED AS FOLLOWS:

SEC TWP 5 3 3 24 14 7 2 3 3 5 E

SCHAMO THE IT MONTH TO BE FROM NOW YIME? IT FOLLY ITHER A TOTAL OF BUS ACRESSES WHEE DIVERTED AND APPLIED TO BENEFICE - SE FOR PROPERCENT MINING OR DRIGGING OPERATIONS TO DISCOVER OR DEVELOPE NATURAL PESOURCES WITHIN ALL AREA OF APPOXIMATE HADIUS OF 50 MILES FROM THE WELL

, JOHN W. WEST, HEHEBY CORTEY THAT I AM THE HEGOTERED PROPESS GNAL ENGINEER AND LAND SURVEYOR WHO PREMARED THE ABOVE MAP AND STATEMENT FROM FIELD NOTES OF AUTUAL "NUER MY DIRECTION, AND THAT THE SAME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF

LICENSE NO. 676 DATE 9-26 -80

SEAL

SCALL : 400

FILE NO. L-5434 & L-5434 ENLARGED

THE REPRODUCTION OF THE **FOLLOWING** DOCUMENT (S) CANNOT BE IMPROVED **DUE TO** THE CONDITION OF THE ORIGINAL

TWP. 19 S RGE. 35 E SEC. _ 1

frictio loss 142, 276 1:0 pri/ft-gradient

EXHIBIT #2
TRUCKERS #1 BRINE STATION
PLAT OF UNDERGROUND WATER



REED & ASSOCIATES, INC.

V. STEVE REED Executive Vice President

December 3, 1987

Mr. Wayne Price Unichem International 707 Leech Street Hobbs, NM 88240-8217

EXHIBIT #3 (TRUCKERS #1)

Dear Mr. Price:

In response to a letter dated November 2, 1987 from the New Mexico Environmental Improvement Division, concerning Unichem International's brine extraction wells, the following responses are provided:

Comment No. 5:

Please provide a comparison of fracture pressure for salt at injection interval (approximately 2,100 feet) with the down-hole pressure resulting from the maximum operating pressure (300 psi for Truckers #1, 450 psi for Truckers #2) (5-206.A.1.).

Response:

The laboratory Poissan's ratio for salt is 0.25. Using the equation below, the potential downhole fracture pressure at the top of the perforations for the two wells is calculated.

P_f = (S - P_O)(γ/1 - γ) + P_O
 P_f = fracture pressure (psi) at injection face
 S = overburden pressure
 P_O = pore pressure
 γ = Poissan's ratio = 0.25
 brine gradient = 0.52 psi/ft

Truckers #1

Truckers #2

| Top of perfs = 2140 | Top of perfs = 2400 |
|--|---|
| S = 1.0 x 2140 | S = 1.0 x 2400 |
| P _O = 0.46 x 2140 = 984 psi | P _O = 0.46 x 2400 = 1104 psi |
| P _f = 1369 psi | P _f = 1532 psi |
| Top hole fracture pressure | Top hole fracture pressure |
| = 1369 psi-(2140ft x 0.52 psi/ft) | = 1532 psi-(2400ft x 0.52 psi/ft) |
| = 256 psi | = 284 psi |

Friction loss = 142 psi

Friction loss = 276 psi

Total top hole fracture pressure

Total top hole fracture pressure

= 398 psi

= 560 psi

Maximum injection pressure = 300 psi

Maximum injection pressure = 450 psi

The injection face fracture pressure is calculated at 1,369 psi for Truckers #1 and 1,532 psi for Truckers #2. The top hole fracture pressure, including friction losses at the maximum injection rate, is 398 psi for Truckers #1 and 560 psi for Truckers #2, leaving a safety factor of 98 psi for Truckers #1 and 110 psi for Truckers #2.

In actuality, salt does not behave in situ as it does in laboratory bench tests. The 0.25 Poissan's ratio calculated for a laboratory sample is the result of stress hardening when a salt core is tested in the laboratory. However, salt in situ responds to stress by plastic flow, and does not fracture. It is our opinion that the operations of the two wells will not initiate fractures in the salt beds.

Comment No. 9:

Please provide maps showing vertical and horizontal limits of all ground water having less than 10,000 mg/l TDS (5-210.B.5.). Also, we need water quality information for water-bearing formations penetrated by brine well (3-106.C.3.).

Response:

The base of the ground water with less than 10,000 total dissolved solids is shown on the attached cross sections. Ground water in the Permian rocks typically exceeds 3,000 parts per million (ppm) total dissolved solids. Ground water produced from the Ogallala in the Hobbs area contains dissolved solids less than 3,000 milligrams per liter (mg/l).

Comment No. 10:

Please provide generalized and specific maps and cross-sections depicting both the regional and site-specific geology (5-210.B.6 and 7).

Response:

Maps and cross sections showing the local geology are presented in Exhibits 1, 2, 3, and 4. **NOTE: Truckers #1 = Exhibits labeled as follows: Exhibit #3-1: Structure Contour Map; Exhibit #3-2: Cross Section Note; Exhibit #3-3: Cross Section A - A'.



Comment No. 12:

The chemical analysis of samples taken from the Trucker #2 monitor sump (Exhibit 7) indicates an exceedance of the 3-103 standards for magnesium, chloride and TDS. Please explain what has caused the violation of the standards and what plans you have to prevent further contamination.

Response:

Exhibit 7 of the Truckers #2 Brine Station submittal showed a chemical analysis of water produced from a sump that is connected to a leachate collection system beneath the brine pond. The total dissolved solids of water produced from this sump was 1,349 mg/l. Chloride concentration was 450 mg/l. Exhibit 8 shows that the brine in the pond has a total dissolved solids approaching 400,000 mg/l and the chloride concentration is in excess of 200,000 mg/l. Because of the significant difference in water quality between the brine in the pond and the water in the sump, it is our opinion that water in the sump is not derived from pond seepage. More likely, the source of the water is either a result of precipitation collecting in the sump or minor seepage of rainfall which has infiltrated around the sump.

Unichem will continue to monitor the sump on a quarterly basis and provide the EID with analytical results.

Very truly yours,

REED & ASSOCIATES, INC.

V. Steve Reed

VSR/kkm

Enclosures



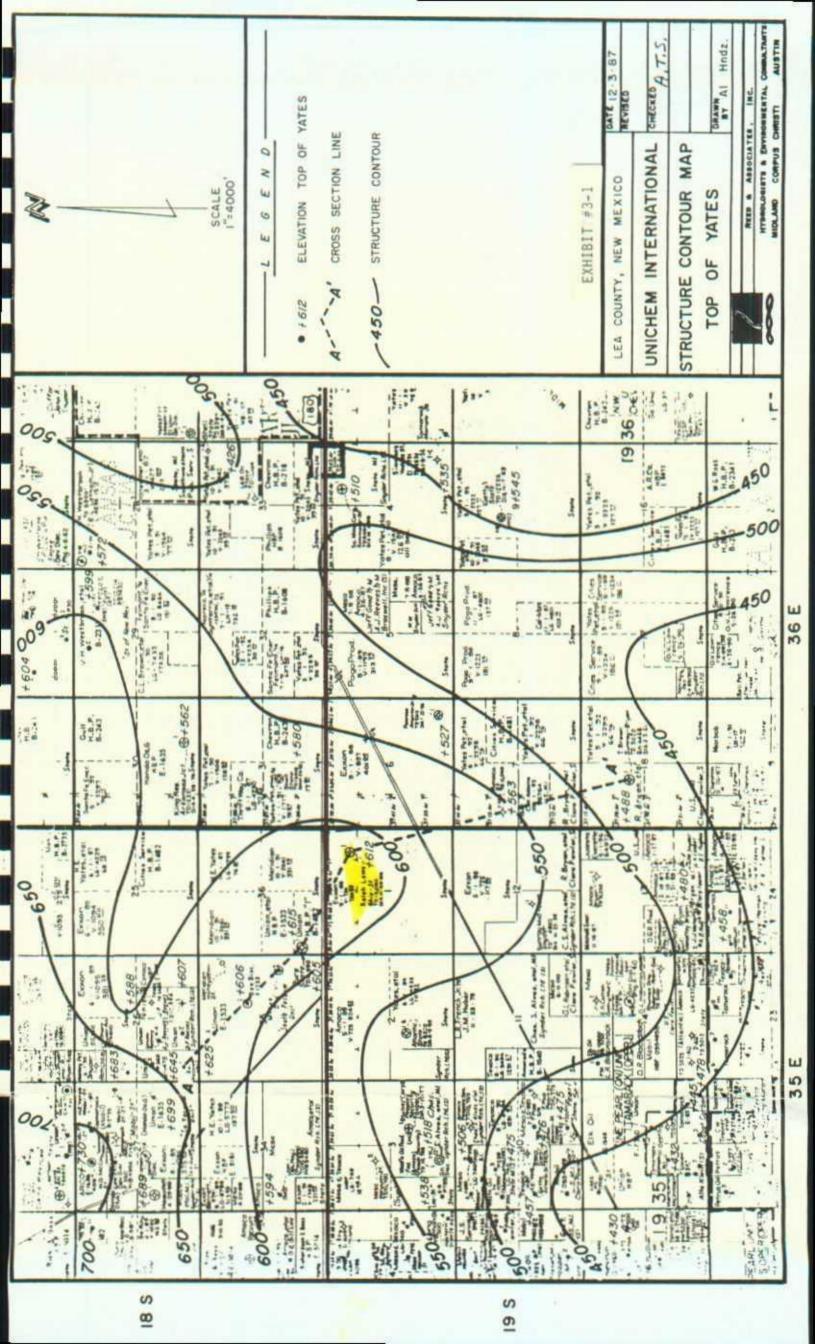


EXHIBIT #3-2

UNICHEM INTERNATIONAL Cross Section Note

A 10,000 parts per million (ppm) line for total dissolved solids (TDS) is shown on the cross sections as being in the Dewey Lake formation. Above this line groundwater generally should have a TDS of less than 10,000 ppm. The Dewey Lake separates the Triassic Santa Rosa (Dockum group) from the Permian salt beds. According to Nicholson and Clebsch in "Geology and Ground-Water Conditions in Southern Lea County, New Mexico," Ground-Water Report 6, New Mexico Bureau of Mines and Mineral Resources, 1961, page 33, "The hydrologic significance of these red beds is not completely understood; however, it is doubtful that any wells in Lea County produce The lower limit of potable water may be water from them. somewhere within the stratigraphic interval. Further, the red beds probably retard the interchange of water between the evaporite-bearing rocks of the Permian and the sandstone aquifers of the overlying Dockum group."

Page 102 of the same report states, "Water samples from the oil-producing zones of the Paleozoic rocks of southern Lea County...are highly mineralized but range in salinity from less than 6,000 to nearly 300,000 ppm." Some instances of less than 10,000 ppm TDS are known to exist in oil producing zones in Lea County below the Dewey Lake redbeds. However, these occurrences should be considered as exceptions rather than the rule.

Analyses of waters from the Hobbs and Vacuum fields near Unichem operations are cited in Ground Water Report 6:

| <u>Township - Range</u> | <u>Pool Name</u> | Source Formation TDS |
|-------------------------|------------------|-----------------------------|
| 18-19S,37-38E | Hobbs | Grayburg-San Andres 21,566 |
| 17-18S,33-35E | Vacuum | Grayburg-San Andres 160,000 |

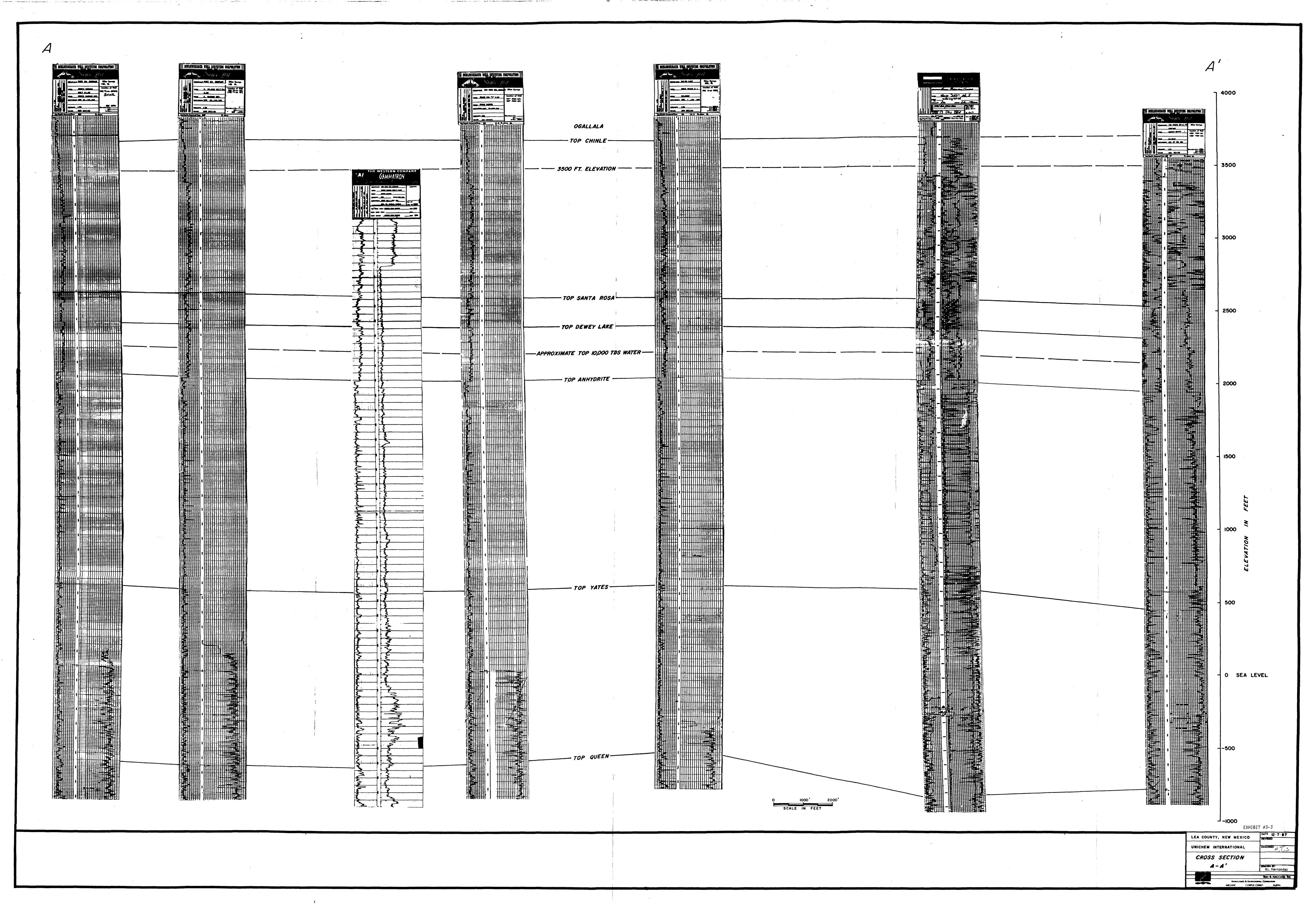
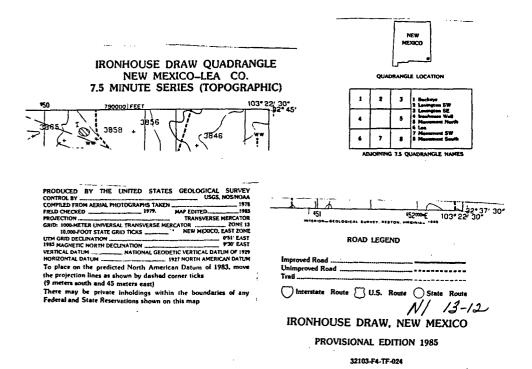


EXHIBIT #3-3
TRUCKERS #1 BRINE STATION
CROSS SECTION A - A'

EXHIBIT #4

TRUCKERS #1 BRINE STATION

UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY



SCALE 1:24 000 1 1 2 0 1 MILE 1000 0 1000 2000 3000 4000 5000 6000 7000 FEET 1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET SUPPLEMENTARY CONTOUR INTERVAL 5 FEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY. DENVER, COLORADO 80225 OR RESTON, VIRGINIA 22092

NOTE PLEASE NOTE THAT SCALE INDICATED ABOVE AND THE ACCOMPANYING MAP ARE DIRECTLY PROPORTIONAL IN SIZE. AS STATED AT THE TOP OF THIS SHEET, THE INFORMATION CONTAINED IN THIS EXHIBIT WAS OBTAINED FROM THE UNITED STATES DEPARTMENT OF THE INTERIOR GEOLOGICAL SURVEY.

