BM - 55

# GENERAL CORRESPONDENCE

# YEAR(S):





# United States Department of the Interior

FISH AND WILDLIFE SERVICE New Mexico Ecological Services Field Office 2105 Osuna NE Albuquerque, New Mexico 87113 Phone: (505) 761-4525 Fax: (505) 761-4542 一, 自己合同人

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October 18, 1996

William J. Lemay, Director Oil Conservation Division 2040 S. Pacheco Sante Fe, New Mexico 87505

Dear Mr. Lemay:

This responds to your agency's public notice dated October 1, 1996, regarding the Energy, Minerals and Natural Resources Department Oil Conservation Division's proposal to approve the discharge plans for the three applicants listed below.

(BW-019) - Rowland Trucking Company. Mr. Pete Turner has submitted an application for renewal of the company's approved discharge plan for the Carlsbad Brine Station located in Section 36, Township 22 South, Range 26 East, Eddy County, New Mexico.

(**BW-022**) - **Quality Brine, Inc.** Mr. Danny Watson has submitted an application for renewal of the company's approved discharge plan for the Tatum Brine Station located in Section 20, Township 12 South, Range 36 East, Lea County, New Mexico.

The U.S. Fish and Wildlife Service (Service) typically recommends the use of excluding technology (nets, fences, enclosed tanks, etc.) to prevent migratory bird and other wildlife access to any brine or produced water storage ponds, evaporative ponds, open tanks, or lagoons that contain toxic chemicals, or which may harbor a surface oil sheen. During flight, migratory birds may not distinguish between an evaporation or storage pond and a natural waterbody: the artificial waterbody may serve as an "attractive nuisance" if measures are not taken to exclude migratory birds from access.

Our intent is to inform and intercede before any migratory bird deaths occur, since these birds constitute a legally protected resource. Under the Migratory Bird Act Treaty (MBTA), the courts have held that an operator of brine, waste water, or other produced water storage facilities may be held liable for an "illegal take" of migratory birds. An "illegal take" has been interpreted to include accidental poisoning or accumulation of harmful concentrations of contaminants by migratory birds, which might occur as a result of access to the stored water. Hydrocarbon pollutants, for instance, can be carried to the nest on breast feathers, feet, or in nesting materials, where the eggs can subsequently become contaminated, leading to embryo death and reduced hatchability.

William J. Lemay, Director

We therefore recommend to the Oil Conservation Division (Division) that storage and evaporative ponds, tanks, and lagoons be constructed in a manner that prevents bird access (e.g., netted), or that the applicants demonstrate that the retained waters are "bird-safe" (e.g., can meet New Mexico general water quality standards 1102.B, 1102.F, and 3101.K or 3101.L). If the construction and operation of such structures results in migratory bird deaths and the problem is not addressed, the operators may be held liable under the enforcement provisions of the MBTA. The Service would rather prevent a problem resulting from migratory bird access to contaminated ponds, lagoons, and tanks than take enforcement actions, which are expensive and disruptive to legitimate mineral extraction and production activities.

(GW-093) - Burlington Resources. Mr. Craig Bock has submitted an application for renewal of the company's approved discharge plan for the Rattlesnake Compressor Station located in Section 36, Township 31 North, Range 9 West, San Juan County, New Mexico. Approximately 31 gallons of waste water is produced daily and is stored in above ground open top steel tanks prior to transport to an approved disposal facility.

To assure that the open top tanks remain "bird-free," the Service again recommends the use of an appropriate exclusion methodology on the tanks (nets, fences, enclosed tanks, closed-forced evaporation systems, etc.) to prevent migratory bird and other wildlife access to any waste water that contains toxic chemicals, or which may have a surface oil sheen. Alternately, the applicant or the Division may demonstrate that the waste water is "bird safe," as described above. We also recommend the use of berms around the tanks to help prevent migration of contaminated waters into a surface water of New Mexico during an accidental tank rupture or spill.

Thank you for the opportunity to review and comment on these discharge plan applications. If you have any questions about these comments, please contact Dennis W. Byrnes at (505) 761-4525.

Sincerely,

Jennifer Fówler-Propst Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico Geographic Manager, New Mexico Ecosystems, U.S. Fish and Wildlife Service, Albuquergue, New Mexico

Senior Resident Agent, U.S. Fish and Wildlife Service, Albuquerque, New Mexico Migratory Bird Office, U.S. Fish and Wildlife Service, Albuquerque, New Mexico 2

# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of che	ck No. <u>2012</u> dated <u>9/23/96</u> ,
	in the amount of \$ 50.00
from Danny's Hat Ge	'P
for Quality Brine	Bw-oir
Submitted by:	OP Nei Date:
Submitted to ASD by:	Date: 10/14/96
Received in ASD by:	Date: 10/23/94
Filing Fee X New Facility	Renewal
Modification Other	
Organization Code <u>52/,07</u>	Applicable FY <u>97</u>
To be deposited in the Water Quality	ty Management Fund.
Full Payment or Annual	Increment

DANNY'S HOT OIL SERVICE INC. 9-94 P. O. BOX 682 505-398-3490	2012
TATUM, NM 88267 9-23 19 96	95-108/1122 7
Arthe of Oil Conservation Division \$ 50.	
UDULAR Western Commerce \$	S Design on back
FOR Renewal Filing Fee for Don's Dean	
"0,201,2" "112201085" 0316476301"	

•	MAiled
· -	State of New Mexico Energy, Minerals and Natural Resources Department B DIVISION OIL CONSERVATION DIVISION P.O. Box 2088 36 73 i will 8 52
	DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES (Refer to OCD Guidelines for assistance in completing the application.) $B\omega - 22$
	$\Box \text{ NEW } \square \text{ RENEWAL}$
I.	FACILITY NAME:QUALITY BRINE
II.	OPERATOR: DANNY WATSON
	ADDRESS: p.o. box 682 TATUM, NM 88267
	CONTACT PERSON: DANNY WATSON PHONE(505)398-3490
III.	LOCATION: <u>SW</u> /4 <u>SW</u> /4 Section <u>20</u> Township <u>12S</u> Range <u>36E</u> Submit large scale topographic map showing exact location.
IV.	Attach the name and address of the landowner of the facility site.
V.	Attach a description of the types and quantities of fluids at the facility.
VI.	Attach a description of all fluid transfer and storage and fluid and solid disposal facilities.
VII.	Attach a description of underground facilities (i.e. brine extraction well).
VIII.	Attach a contingency plan for reporting and clean-up of spills or releases.
IX.	Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water.
Χ.	Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
XI.	CERTIFICATION
	I hereby certify under penalty of law that I have personnaly examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.
	Name: Danny Walson Title: Pres / auno
	Signature: Dan Interne Materia Bal 9-19-96

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

QUALITY BRINE P.O. BOX 682 TATUM,NM 88267

Sept. 19,1996

RE:-Renewal-Quality Brine -

State of New Mexico Energy, Minerals, and Natural Resources Dept. Oil Conservation Division P.O BOX 2088 Santa Fe, NM 87501

Dear Mark;

This is my renewal notice. There is no change in discharge plan. Please let me know if you have any questions.

Sincerely,

Dapaty Watson (505) 398-3490

DANNY'S HOT OIL SERVICE INC. P. O. BOX 682 505-398-3490 TATUM, NM 88267 PAY TO THE ORDER OF Oil Conservation Jifty + No7100	9-94 2012 9-94 9-94 9-94 9-94 9-94 95-108/1122 7 00 00 00 00 00 00 00 00 00
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## STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

(BW-019) - Rowland Trucking Company, Pete Turner, (505) 397-4994, 418 South Grimes, Hobbs, New Mexico, 88240 has submitted an application for renewal of its previously approved discharge plan for the Carlsbad Brine Station, located in the SE/4 NE/4 of Section 36, Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico. Fresh water is injected to an approximate depth of 710 feet and brine water is extracted with an average total dissolved solids concentration of 300,000 mg/l. Ground water most likely to be affected by any accidental discharge is at a depth exceeding 150 feet and has a total dissolved solids content of approximately 1,800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-022) - Quality Brine, Inc., Danny Watson, (505) 398-3490, P.O. Box 682, Tatum, New Mexico, 88267 has submitted an application for renewal of its previously approved discharge plan for the Tatum Brine Station located in the SW/4 SW/4 of Section 20, Township 12 South, Range 36 East NMPM, Lea County, New Mexico. Fresh water is injected to an approximate depth of 2,300 feet and brine water is extracted with an average total dissolved solids concentration of 350,000 mg/l. Ground water most likely to be affected by an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-093) - Burlington Resources, Craig Bock, (505) 326-9537, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge application for renewal of its previously approved discharge plan for the Rattlesnake Compressor Station located in the NW/4 NW/4 of Sections 36, Township 31 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 31 gallons per day of waste water is stored in above ground open top steel tanks prior to transport to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 25 feet with a total dissolved solids concentration of approximately 1,400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan renewal applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through

Friday. Prior to ruling on any proposed discharge plan renewals or modifications, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of October 1996.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

SEAL

QUALITY BRINE P.O. BOX 682 TATUM,NM 88267

Sept. 19,1996

State of New Mexico Energy, Minerals, and Natural Resources Dept. Oil Conservation Division P.O BOX 2088 Santa Fe, NM 87501

RE: Renewal Quality Brine

Dear Mark;

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This is my renewal notice. There is no change in discharge plan. Please let me know if you have any questions.

Sincerely,

Dapaty Watson (505) 398-3490

€ •	State of New Mexico Energy, Minerals and Natural Resources Department
N PONSER . RECT	Salia Fe, NWI 07501
ES SEL YR	DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES (Refer to OCD Guidelines for assistance in completing the application.)
	□ NEW  ☐ RENEWAL
I.	FACILITY NAME: QUALITY BRINE
II.	OPERATOR: DANNY WATSON
	ADDRESS: p.o. box 682 TATUM, NM 88267
	CONTACT PERSON: DANNY WATSON PHONE <sup>(505)398-3490</sup>
III.	LOCATION: <u>SW</u> /4 <u>SW</u> /4 Section <u>20</u> Township <u>12S</u> Range <u>36E</u> Submit large scale topographic map showing exact location.
IV.	Attach the name and address of the landowner of the facility site.
V.	Attach a description of the types and quantities of fluids at the facility.
VI.	Attach a description of all fluid transfer and storage and fluid and solid disposal facilities.
VII.	Attach a description of underground facilities (i.e. brine extraction well).
VIII.	Attach a contingency plan for reporting and clean-up of spills or releases.
IX.	Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water.
Χ.	Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
XI.	CERTIFICATION
	I hereby certify under penalty of law that I have personnaly examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. Name: Denne Walson Title: Mes Journer.
	Signature: Dany Ulakon Date: 9-19-96

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





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

September 11, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-854

Mr. Danny Watson Quality Brine, Inc. P.O. Box 682 Tatum, NM 88267

# RE: Discharge Plan BW-022 Renewal Tatum Brine Station Lea County, New Mexico

Dear Mr. Watson:

On October 9, 1985, the groundwater discharge plan, BW-022, for the Quality Brine, Inc. (Quality) Tatum Brine Station located in the SW/4, SW/4 of Section 20, Township 12 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). The discharge plan was subsequently renewed on March 12, 1992. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on March 11, 1997.

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. Pursuant to Section 5101.G., if an application for renewal is submitted at least 180 days before the discharge plan expires ( on or before September 11, 1996), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Quality has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

Mr. Danny Watson September 11, 1996 Page 2

The discharge plan renewal application for the Tatum Brine Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690.00 for Brine Extraction Facilities. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

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

Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. The following information is enclosed: Application form, Guidelines, and WQCC regulations.

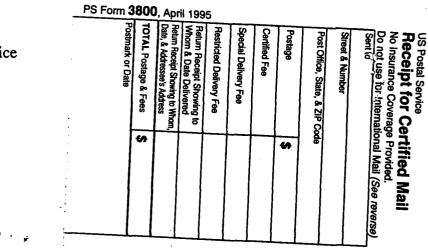
If Quality no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Quality has any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,

Roger C. Anderson Environmental Bureau Chief

RCA/mwa

xc: OCD Artesia Office



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#### STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

March 17, 1995

<u>Certified Mail</u> <u>Return Receipt No. Z-765-962-829</u>

Mr. Danny Watson Quality Brine, Inc. P.O. Box 682 Tatum, NM 88267

RE: Emergency Catchpit East of Pump House Quality Brine, Inc. Tatum, NM

Dear Mr. Watson:

The New Mexico Oil Conservation Division (OCD) has completed a review of the Quality Brine, Inc. February 27, 1995 pit closure letter for the "Emergency Catchpit East of the Pump House." Based on the information provided, your pit closure is approved with the following conditions:

- 1. The remediation project will conform to the OCD "Unlined Surface Impoundment Closure Guidelines."
- 2. A closure report of final clean-up will be submitted to the OCD Santa Fe and Hobbs District offices by June 30, 1995.
- 3. The OCD will be notified at least 72 hours in advance of all closure activities such that the OCD may have the opportunity to witness and/or split samples.

Please be advised that OCD approval does not relieve Quality Brine, Inc. of liability if closure activities determine that contamination exists which is beyond the scope of the closure plan, or if the closure activities fail to adequately remediate contamination at the site. In addition, OCD approval does not relieve Quality Brine, Inc. of liability for compliance with other federal, state or local laws and/or regulations.

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Mr. Danny Watson March 17, 1995 Page 2

If you have any questions regarding this matter, please feel free to contact me at (505) 827-7155.

Sincerely,

Mark John

Mark Ashley Environmental Geologist

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xc: Jerry Sexton, OCD Hobbs Office Wayne Price, OCD Hobbs Office

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Z 765 962 829

# Mark Ashley

From:POSTOFFICETo:Mark AshleySubject:Registered: Wayne PriceDate:Thursday, March 16, 1995 7:53PM

[013] \*\*\*\*\* CONFIRMATION OF REGISTERED MAIL \*\*\*\*\* Your message:

TO: Wayne Price SUBJECT: Pit Closure

DATE: 03-14-95 TIME: 15:25 BW-22

Was accessed on 03-16-95 19:53

# Mark Ashley

From:	Jerry Sexton
Date sent:	Wednesday, March 15, 1995 8:04AM
То:	Mark Ashley
Subject:	Registered: Jerry Sexton

Your message	
To:	Jerry Sexton
Subject:	Pit Closure
Date:	Tuesday, March 14, 1995 3:21PM
was accessed on	-
Date:	Wednesday, March 15, 1995 8:04AM

BW-22

OIL CONSERVE ON DIVISIO 95 FE- 21 RM 8 52

QUALITY BRINE P.O. Box 682 TATUM, NM 88267 398-3490 WOISSN, INC. 20 E. BRODOWAT

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

RE: Emergency Catchpit East of Pump House

Dear Mr. Ashley:

First, I need to tell you that Stan Watson is no longer in the business. I will be taking his place.

I would like you to know that I plan to pull out or clean out this pit to pass the (BTEX) and T.P.H. test, also, put soil dug out of pit on an old drilling pit location on site. This old drilling pit has 6-mil plastic. Approximately  $3\frac{1}{2}$  to 4' deep and has not been broken to my knowledge ( other than the sides to let dry out and once it was dry pushed back in where dug out and now has weeds growing back.)

I propose to put contaminated dirt from pit east of water tanks on old drill pit and land farm it by mixing cow manure with it to help remediation process speed up. I will fill in pit east of water tanks with rocks and material strong enough to hold up heavy equpiment and maybe in the future put in more fresh water tanks.

I have already put 3' dikes around all tanks in use so fresh water cannot run back in pit.

I would like you to know I fully intend to do what I need to comply as long as it is reasonable and fesiable. I don't sell enough brine or fresh water to do anything elaborate.

Ulaleo Sincerely, Watson

cc: Oil Conservation Hobbs, NM 88240

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	OIL CONSERVE JUN DIVISION RECEIVED	
t	195 FER 16 AM 8 52	
STATE OF NEW MEXICO OIL CONSERVATION DIVISION	MEMORANDUM OF MEETING O	R CONVERSATION
Telephone Personal	Time 2:00 pm	Date 2/13/95
<u>Originatin</u>		Other Parties
DANNY WALSON - A BW-022 Subject Pit CLOSMAE	PLALITY BRINE	
BW-022	TATOMNM	
Subject Pit CLOSMAE	LETTER from	MAAN ASHLEY
AVALYTIZA	C Info!	INFO ON PIT CLOSUMES GUINELINES, REQUESTED HB WILL NEED TO LOADING ALENS!
AISEUSSED	ABATH TO	GROUND WATER 15 E = 20
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istribution	Signe	
CC MARK ASHO SERRY SEXT		a Maplan .

STATE OF NEW MEXICO GIL CONSERVE FUN DIVISION ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION FEB 9 AM 8 52 HOBBS DISTRICT OFFICE

**BRUCE KING** GOVERNOR

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POST OFFICE BOX 1980 HOBBS. NEW MEXICO 88241-1980 (505) 393-6161

MOCD Inter-Correspondence

To:

Roger Anderson-Environmental Bureau Chief

From:

Wayne Price-Environmental Engineer District I

Date: September 1, 1994

Reference: Brine Stations

Subject: Site Inspections

Comments:

Roger, per your request, please find enclosed some recent brine station inspection reports.

Jerry Sexton-District I Supervisor cc:

Attachments-3

STATE OF NEW MEXICO NMOCD District I

#### INTER-OFFICE MEMO

Other: X

To file: Quality Brine Station

Date: August 23, 1994 Time: 12:30 pm

Telephone call: Meeting:

"on site inspection"

Person called or attending:

Wayne Price- NMOCD Danny Watson-owner of brine station Danny's Hot Oil truck driver

REFERENCE: Quality Brine, Inc DP# BW-022 Tatum NM- sw/4 sw/4 S20-Ts12s-R36e

Subject: Routine Inspection

Comments:

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Brine Station has reduced activity due to slow down in drilling. Brine station berms not maintained, would not contain spill.

Present spills are draining to low lying area show on attached plot plan. This area has both oily and salt contaminated dirt. The extent is not know at this time. There is a small dirt pile of oily dirt on site. The low lying area is connected to a 3' deep and approximately 30' long ditch. This ditch is used to drain off any run-off water to percolate into ground.

Checked brine well, values are aligned properly, fresh water down annuals, brine water up the tubing.

Found old pit area just east of pump house, pit is dry and empty.

There are two crude oil tanks and one large diesel tank on site.

Mr. Watson indicated that the diesel tank is empty. The two oil tanks are used for storage of crude. Mr. watson operates a treating plant near Milnesand NM and uses these tanks as temporary storage. There was a hot oil unit on site at the time connected to the tanks. The driver indicated to me he was treating the oil.

The unloading area near the oil tanks has unloading pots, these were full and running over. Mr. Watson indicated he would empty these.

There is no secondary containment any where on site.

Mr. Watson indicated that business has been so slow, that he cannot afford to do a whole lot of improvements.

We discussed the depth of ground water, He indicated that ground water is only 20 to 30 feet deep. He also showed me the area to the northeast approximately 200-300 yards is where he and the city of Tatum has their fresh water supplies. He indicated that these wells run from 80' to 160' deep. He indicated there are different zones of fresh water. He did not know if they are hydraulically connected. These wells are new because of the on going ground water contamination study being conducted by the NMED and TATUM.

I recommended to Mr. Watson that he address the issue of the oily dirt and "no berms" some time in the near future.

Mr. Watson indicated that when the NMED had jurisdiction they forced him to shut down.

Wayne Price

NMOCD Environmental Engineer-District I

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State of New Mexico ENERGY, MERALS and NATURAL RESOURCES DE RTMENT





New Meeica /// DRUG FREE H's a State of Minut!	
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January 30, 1995

### CERTIFIED MAIL RETURN RECEIPT NO. Z-765-962-815

Mr. Stan Watson Quality Brine, Inc. P.O. Box 75 Tatum, NM 88267

## RE: Emergency Catchpit East of Pump House Quality Brine, Inc. Tatum, NM

Z 765 962	815
Receipt for Certified M No Insurance Co Do not use for h (See Reverse)	ail verage Provided
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Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
	Receipt for Certified M No Insurance Co Dg not use for In (See Reverse) Sent to Street and No. P.O., State and ZIP Code Postage Certified Fee Special Delivery Fee Restricted Delivery Fee Restricted Delivery Fee Return Receipt Showing to Whom & Date Delivered Return Receipt Showing to Whom, Date, and Addressee's Address TOTAL Postage & Fees

Dear Mr. Watson:

The New Mexico Oil Conservation Division (OCD) inspected your facility on January 24, 1995. At that time the emergency catchpit to the east of pump house had approximately 6 inches of fluid (water and oil) present in the pit. According to the most recent discharge plan renewal dated March 12, 1992, the emergency catchpit was to be closed by March 12, 1993. The OCD requires that you submit a work plan for closure of the pit by March 1, 1995.

If there are any questions on this matter, please contact me at (505) 827-7155.

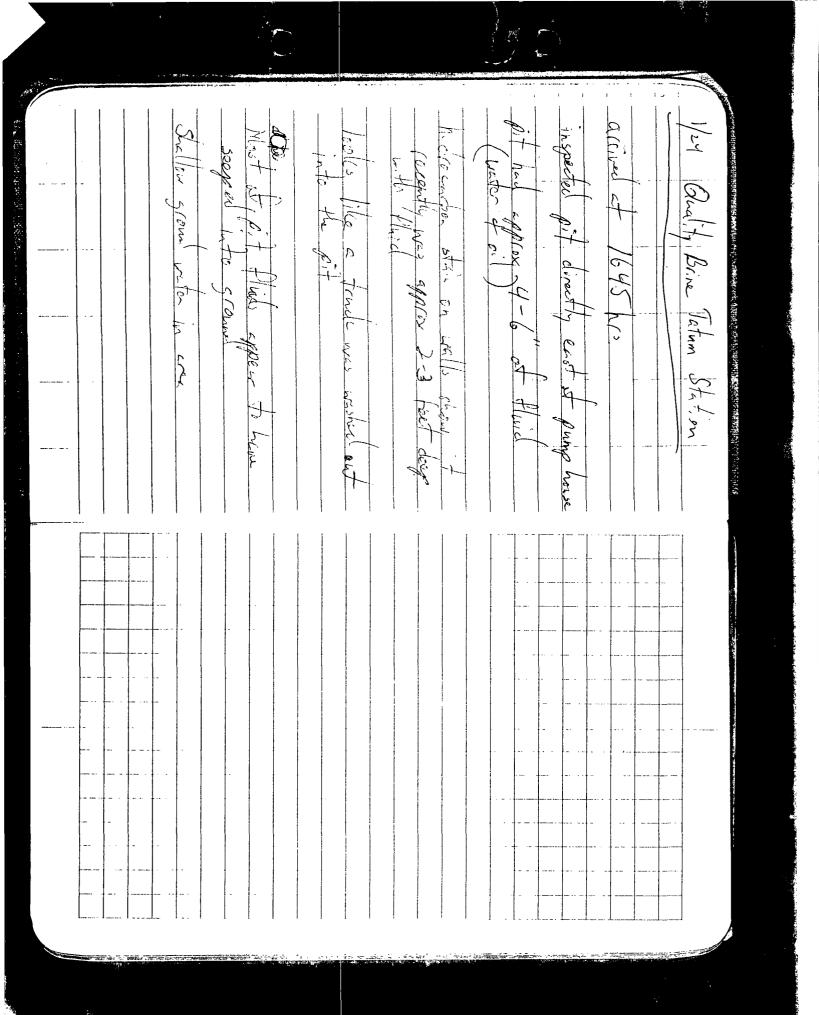
Sincerely, ank tahin

Mark Ashley Environmental Geologist

xc: Jerry Sexton, OCD Hobbs Office Wayne Price, OCD Hobbs Office

VILLAGRA BUILDING - 408 Gallateo Forestry and Resources Conservation Division P.O. Box 1948 87504-1948 827-5830 Park and Recreation Division P.O. Box 1147 87504-1147 827-7465 2040 South Pacheco

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



STATE OF NEW MEXICO NMOCD District I

#### INTER-OFFICE MEMO

To file: Quality Brine Station

Date: August 23, 1994 Time: 12:30 pm

Telephone call: \_\_\_\_ Meeting: \_\_\_\_

Other: X

"on site inspection"

Person called or attending:

Wayne Price- NMOCD Danny Watson-owner of brine station Danny's Hot Oil truck driver

REFERENCE: Quality Brine, Inc DP# BW-022 Tatum NM- sw/4 sw/4 S20-Ts12s-R36e

Subject: Routine Inspection

CC: CHRIS EUSTIER

Comments:

A.

Brine Station has reduced activity due to slow down in drilling. Brine station berms not maintained, would not contain spill.

Present spills are draining to low lying area show on attached plot plan. This area has both oily and salt contaminated dirt. The extent is not know at this time. There is a small dirt pile of oily dirt on site. The low lying area is connected to a 3' deep and approximately 30' long ditch. This ditch is used to drain off any run-off water to percolate into ground.

Checked brine well, valves are aligned properly, fresh water down annuals, brine water up the tubing.

Found old pit area just east of pump house, pit is dry and empty. There are two crude oil tanks and one large diesel tank on site. Mr. Watson indicated that the diesel tank is empty. The two oil tanks are used for storage of crude. Mr. watson operates a treating plant near Milnesand NM and uses these tanks as temporary storage. There was a hot oil unit on site at the time connected to the tanks. The driver indicated to me he was treating the oil.

The unloading area near the oil tanks has unloading pots, these were full and running over. Mr. Watson indicated he would empty these.

There is no secondary containment any where on site.

Mr. Watson indicated that business has been so slow, that he cannot afford to do a whole lot of improvements.

We discussed the depth of ground water, He indicated that ground water is only 20 to 30 feet deep. He also showed me the area to the northeast approximately 200-300 yards is where he and the city of Tatum has their fresh water supplies. He indicated that these wells run from 80' to 160' deep. He indicated there are different zones of fresh water. He did not know if they are hydraulically connected. These wells are new because of the on going ground water contamination study being conducted by the NMED and TATUM.

I recommended to Mr. Watson that he address the issue of the oily dirt and "no berms" some time in the near future.

Mr. Watson indicated that when the NMED had jurisdiction they forced him to shut down.

Wayne Price

NMOCD Environmental Engineer-District I

Cor ANIO WINKS WELL FIELD 50 1710 A TUM, DEAL NASI WALER LOCA ( WA TSON) CPO R+D GROUND Ð N'N PUNP FRAC K at S SAO ひれせらい ie. FW री 380 FRES E X OILY DIRTASALL CAN CALICHY Soil VOTES: BRing Ros LizLi Q WWA FE B 6 BOINE BRIN WAFR GROVE ¥ "no BEPERS READ Ì BRIE 25 i 110 210 DRIVE WAY FOR LOAD/MNLOAD QIL. BY LANA DIESEL TANK-54/4 LAI THOO 102 tsad BRINE 54/4 ズシ BRIVE, PRICE 520-75 125-57 Ter. 9/23/94 Bul-RJ6. 11 R ካ L -, · • ....

# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

	I hereby acknowledge receipt of check No. $909$ dated $11/5/92$ ,		
	or cash received on $\frac{11/6/92}{10.00}$ in the amount of \$ 90.00		
	from Quality Brine Station		
·	for Tatum Bring Station BW-22		
	(Facility Name) (DP No.) Submitted by:		
	submitted to ASD by: Kathy Brown Date: 11/6/92		
	Received in ASD by: Norry Gonzalio Date: 11/6/92		
	Filing Fee New Facility Renewal		
	Modification Other		
	Organization Code $521.07$ Applicable FY $93$		
	To be deposited in the Water Quality Management Fund.		
Full Payment or Annual Increment $X$			
	#7- total to date \$69000		
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	HOBBS, N. M. 3024. $11/5/$ 19 92		
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TO The	Water Quality Management P.O. Box 2088		
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# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt	of check No. <u>906</u> dated <u>10-15-9</u> 2
or cash received on <u>11/6/97</u>	in the amount of $ 100.00 $
from Quality Price	
for Tortum Brine Stat	im BW-22
(Facility Name) Submitted by:	(DP No.) Date:
Submitted to ASD by: Kath	4 From Date: 11/6/92
Received in ASD by:	+ Gangalio Date: 11/10/92
Filing Fee New Fa	Cility Renewal X
Modification Othe	r
Organization Code <u>521.0</u>	(specify) 7 Applicable FY <u>93</u>
To be deposited in the Water	Quality Management Fund.
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#6-total + balance	2 ISC
QUALITY BRINE	First National Bank of Lea County Hobbs, New Mexico 88240
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Water Quality manage	ment
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OF State Land office Bu	I ding
Par One hundred ~ no/100 Water Quality Manage OF P.O. Box 2088 State Land office Bun Santa Fe, N.M. 87504	Sta Wat-
	11: •••03007847#01

<b>č</b>	10/15/92 906	DATE	INVOICE	QUALITY BRINE
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#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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I hereby acknowledge receipt of check No. 901 dated 9/2/92, or cash received on  $\frac{9/21/92}{100.00}$  in the amount of \$ 100.00 from Quality Brine (DP No.) For Tatum Brie Station (Facility Name) Submitted by: Submitted to ASD by: Kathey from \_ Date: 9/34/9. Date: Mally ( Thomas Date: 9, Received in ASD by: Filing Fee \_\_\_\_ New Facility \_\_\_\_ Renewal Modification \_\_\_\_ Other Organization Code <u>521.07</u> Applicable FY <u>93</u> To be deposited in the Water Quality Management Fund. Full Payment \_\_\_\_\_ or Annual Increment  $\underline{\mathcal{K}}$ #5 - total to date \$500 balance \$ 190 901 QUALITY BRINE First National Bank of Lea County P. O. BOX 5967 393-0762 Hobbs, New Mexico 88240 HOBBS, N. M. 88241 <u>95-199</u> 1122 **19**92 9/2/ Dollars \$\_\_\_\_0.00\* \*\* One Hundred Dollars and No/100\*\* PAY\_ TO THE ORDER Water Quality Management OF St Uch P.O. Box 2088 State Land Office Building Santa Fe, NM 87504 ···O3007847#01 

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<b>*</b>		 9/2/92	DATE	INVDICE	QUALITY BRINE
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	I hereby acknowledge receipt of check No. <u>898</u> dated $\frac{8/12/92}{92}$ ,	
	or cash received on $\frac{8/24/92}{100.00}$ in the amount of \$ 100.00	
	from Quality Brine	
	for Tatum Brine Station BW-22	
	(Pecility Name) (DP No.) Submitted by:Date:	
	submitted to ASD by: Kaulanden Date: 8/24/92	
	Received in ASD by: Allowy (. Moreloge Date: 8/24/92	
	Filing Fee New Facility Renewal 🔽	
	Modification Other	
	Organization Code $521.07$ Applicable FY $93$	
	To be deposited in the Water Quality Management Fund.	
	Full Payment or Annual Increment $X_{-}$ #4 - total to date \$400°	
29	QUALITY BRINE P. O. BOX 5967 393-0762 North Marine 88240	8
	HOBBS, N. M. 88241 <u>8/12/92.19</u> 112	
Pay	One Hundred dollars and No/100** Dollars \$*100.00*	
TO THE ORDER	Water Quality Management P.O. Box 2088	
OF	State Land Office Building Santa Fe, NM 87504	
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<u>.                                    </u>		FREIGHT	EDUCTIONS
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#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. 393 dated 7/16/92, or cash received on 7/34/92 in the amount of \$ 100.00from Quality Brine for Quality Brne-Tatum Station BW-22 (Facility Name) (OP No.) Submitted by: Date: Date: 7/24/92 Submitted to ASD by: Kather B Received in ASD by: Sherry Gomales Date: 7/24/92 Filing Fee \_\_\_\_ New Facility \_\_\_\_ Renewal X Modification \_\_\_\_ Other Organization Code 521.07 Applicable FY 93To be deposited in the Water Quality Management Fund. Full Payment \_\_\_\_\_ or Annual Increment \$100 3 of 5 total to date \$300 893 First National Bank of Lea County QUALITY BRINE Hobbs, New Mexico 88240 P. O. BOX 5967 393-0762 HOBBS, N. M. 88241 <u>95-199</u> 1122 7/16/ **19**92 ---- Dollars \$<u>\*\*100.00\*\*</u> \*\*One Hundred dollars and No/100------PAY\_ Water Quality Management TO THE ORDER P.O. Box 2088 State Land Office Building OF Santa Fe, NM 87504 **■**000893**■** ■ **■ ■ ■ 1** 2 20 **1** 9 **1 ■** 

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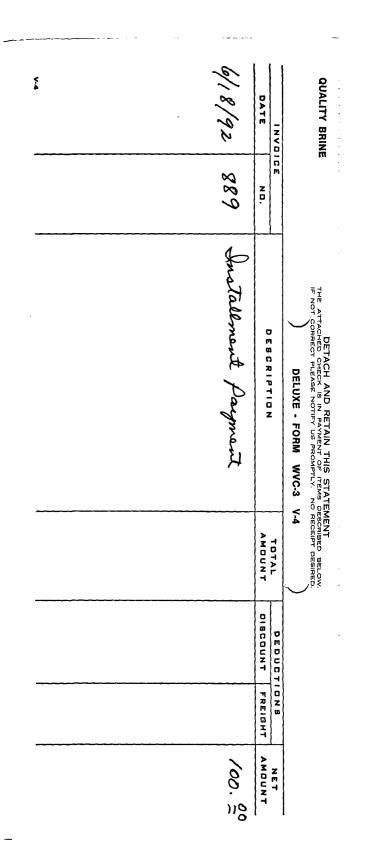
## ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of ch	eck No. 887 dated 6/18/92,
or cash received on <u>6/23/92</u>	, ,
from Quality Brine.	
for Jatum Station	BW-22
(Facility Name) Submitted by:	(DP No.) Date:
Submitted to ASD by: Rogan	moleun Date: 6/23/92
Received in ASD by:	
Filing Fee New Facilit	.y Renewal
Modification Other	
	(specify)
Organization Code <u>52/.07</u>	_ Applicable FY <u>OO</u>
To be deposited in the Water Qual	ity Management Fund.
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ORDER PO. BOX 2088	
State Land office Building	8
Santa Fe, n.m. 87504	Sten Wat-

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PAY\_\_\_\_

DELUXE CHECK PRINTER



# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. $883$ dated $4/8/92$ ,
or cash received on $\frac{4/13/92}{13/92}$ in the amount of \$ 100.00
from Guality Brine
for Tatum Station BW-22
Submitted by: Korgan Condem Date: 4/13/92
Submitted to ASD by:Date:
Received in ASD by:Date:Date:
Filing Fee New Facility Renewal
Modification Other
(apocify)
Organization Code $52/07$ Applicable FY $80$
To be deposited in the Water Quality Management Fund.
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	HOBBS, N. M. 88241		<u>95-199</u> 1122
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# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

	I hereby acknowledge receipt of c	neck No. 882 dated $\frac{2}{8}/92$ ,
	or cash received on 4/13/92	in the amount of \$ $50.00$
	from Quality Brine	
	for Tatum Station	BW-22
	Submitted by: Kare	Qual Date: 4/13/92
	Submitted to ASD by:	Date:
	Received in ASD by:	Date: <u>4/13</u>
	Filing Fee 🔨 New Facili	ty Renewal
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	Organization Code <u>52/07</u>	Applicable FY 80
	To be deposited in the Water Qua	lity Management Fund.
	Full Payment or Annu	al Increment
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		First National Bank of Lea County
	P. O. BOX 5967 393-0762 HOBBS, N. M. 88241	Hobbs, New Mexico 88240
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Pay **	Fifty Dollars and NO/100**	<b>Dollars \$</b> <sup>*50.00*</sup>
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	4/8/92	DATE	INVOICE	QUALITY BRINE
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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION





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

March 12, 1992

## CERTIFIED MAIL RETURN RECEIPT NO. P-670-683-504

Mr. Stan Watson Quality Brine, Inc. P. O. Box 75 Tatum, New Mexico 88267

# RE: Approval of Discharge Plan BW-22 Quality Brine, Inc., Tatum Brine Station Lea County, New Mexico

Dear Mr. Watson:

The discharge plan renewal BW-22 for the Quality Brine, Inc. Tatum Station located in the SW/4 SW/4, Section 20, Township 12 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The renewal application consists of the original discharge plan as approved October 9, 1985, and the renewal application dated October 3, 1991.

The discharge plan renewal was submitted pursuant to Section 5-101.B.3 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Sections 5-101.A and 3-109.C. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications 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 water, ground water, or the environment which may be actionable under other laws and/or regulations.

The monitoring and reporting shall be as specified in the enclosed attachment. Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. Stan Watson March 12, 1992 Page 2

Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire March 11, 1997, and you should submit an application for renewal in ample time before this date. Note that under Section 5-101.G of the regulations, if a discharger submits a discharge plan renewal application at least 180 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

As previously stated in the OCD letter dated October 29, 1991, the discharge plan renewal application for the Quality Brine, Inc., Tatum Brine Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or sixhundred and ninety (690) dollars.

The \$50 filing fee has not been received by the OCD and is due upon receipt of this letter. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval. The flat fee (total payment or installment) is due upon receipt of this letter.

Please make all checks out to the NMED - Water Quality Management and send to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

cc:

William J. LeMay Director WJL/kmb Attachment Chris Eustice - OCD Hobbs Office

# ATTACHMENT TO DISCHARGE PLAN BW-22 APPROVAL QUALITY BRINE INC., TATUM BRINE STATION MONITORING AND REPORTING REQUIREMENTS

- 1. <u>Payment of Discharge Plan Fees</u>: The \$50 filing fee and the \$690 flat fee (either total payment or installment) will be paid upon receipt of this approval letter.
- 2. <u>Mechanical Integrity Testing</u>: An annual mechanical integrity test (MIT) will be conducted on the brine well and the results submitted to the OCD Santa Fe Office. An MIT isolating the casing from the formation will be conducted within 1-1/2 years from receipt of this approval letter.
- 3. <u>Injection/Production Volumes</u>: A quarterly report will be submitted listings of the volume of fluids injected and produced beginning with the second quarter (April-June) 1992. The report will be submitted to the OCD Santa Fe Office at the end of each quarter.
- 4. <u>Fresh Water Analyses</u>: Quality Brine has committed to quarterly sampling of the Al Griffin, Danny Watson, and Synergy Gas Products wells for chlorides and total dissolved solids (TDS). Because of the current sampling results, the nonexistence of any pits or ponds, and the requirement for annual MIT's, the OCD will allow the sampling schedule to be decreased to once every 5 years or at the time of your discharge plan renewal. The OCD has received your January 1992 analyses of these wells and does not require another analysis until your next discharge plan renewal application is submitted.
- 5. <u>Removal of Contaminated Soils</u>: The stained soils around the decommissioned tank containing tank bottoms will be excavated and disposed of at an OCD approved disposal facility within 6 months from receipt of this letter.
- 6. <u>Containment of Spills</u>: Adequate containment will be maintained around the loading valves of all tanks. The containment will be inspected and maintained to prohibit leaks, spills and overflows. Berms will be maintained around all tanks (other than freshwater) to contain one-third greater than the volume of the largest tank or all interconnected tanks.
- 7. <u>Closure of Emergency Pit</u>: Quality Brine will close the emergency pit by removing all trash and backfilling with clean soil within one year from receipt of this letter.

STATE OF NEW MEXICO MEMORANDUM OF MEETING OR CONVERSATION CONSERVATION DIVISION Time Date Telephone Personal 8:00 A.M. March 9, 199 Originating Party Other Parties ather Stan Watson ronz upject Approval - need DP Ret to Ge rec  $\sqrt{0}$ mos Viscussion Stan we have to have guarterly 010 luction volumes because they Drod clain ane ClassIII CFR Reg. 5). He sa head (Fresh water wel the well l) and Sold tanks at water pnd For produced torne he said hed use his sal removed contaninated AISO 0he had contacted CRI, but was truing to provide his own trucking to save (\$300±400) onclusions or Agreements to approve stribution Signed

#### QUALITY BRINE DP RENEWAL UPDATE (as of 1/30/92)

- A. Had spoken with Stan Watson the first week of January 1992 about remaining DP renewal requirements. He said he'd get the materials in as soon as possible. Also, asked if he could send an analysis of aromatics from his water well performed by the NMED in January 1991. Told him that was fine. He also said that the analyses for TDS and chlorides for the 3 required wells and the remaining analyses for aromatics were in the process of being sampled and analyzed. Would send them as soon as available.
- B. Telephoned Stan Watson on 01/30/92 to discuss remaining DP renewal requirements. As of this point have recieved the aromatic analysis for the Watson water well and the TDS and (chloride analyses for the 3 required wells.
  - 1. Need to run an MIT before renewal and commit to running a positive pressure test within the next 1-1/2 years.
    - Did 10-2-91 Will submit commitment
  - 2. Is all your produced fresh water injected for brine production? If not, need to submit report of produced feshwater plus sold freshwater, and also report sales figures for produced brine on a quarterly basis (listed by month). OR, could submit monitoring of injection pressur and either flow rate or volume recorded semimonthly.
  - 3. Only other analyses needed are for the aromatics for Al Griffin and Synergy Gas Well (Union Gas). Can drop your sampling schedule of quarterly water analyses for TDS and chlorides down to annual testing.
  - $\sqrt{4}$ . Old caliche pit is O.K. Viewed the soils around it on last inspection trip (Nov. 1991) and they are not oilstained.  $\mathcal{OK}$
  - $\sqrt{5}$ . The stained soils around the old tank containing tank bottoms still need to be excavated and disposed of. If there is nothing left in the tank then it can be left in place. Have contract of CRI
    - 6. Still need the \$50 filing fee and will need the flat fee of \$690 when the plan is approved.

# STATE OF N MEXICO County of Bernalillo

SS

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

OIL CONSERVATION DIVI.

'91 DE: 10 AM 9

(BW-15) Marathon Road Water Ration, G. W. Trainer, 8050 E. Kali

Station, S. W. Trainer, 8050 E. Kalil. Dr., Scottscheb, Artxons 65260, has submitted a renewal application for the previously, approved discharge plan for their institu extraction, brine well facily. The Marathon Road Water Station is located in the SW/4.SE/4, Section .25, ...Township 19. South, Range 34 East, NMPM, Law County, New Mexico, Fresh water is injected into the Salado Formation, at an approximate depth of 1950 to 2400 feet and brine is aptracted with an average total dissolved solids com-centrations of about 321,060 mg/1. Groundwater incest litkely to be

Groundwater, most likely to affected by an accidental discharg

mineceso by an accelental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentrantion rang-ing from 500 to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accelental dis-

charges to the surface will be man gaged. (BW-22) - Quality Brine, Inc., Stan Watson, P.O., Box 76, Tatum, New Mexico 88267, has submitted a rene-

Mexico 88287, has submitted a rene-wal application for the previously approved discharge plan for their instruestraction brive well facility. The Quality Brine Water Station is located in the SW/41 SW/4, Section 20, Township (2. South, Range 38, East), NMPM, Les Courty, New Mexico, Fresh water la injected into the Salado Formation at an approximate death of 2000 to 2800 feet and brine

depth of 2300 to 2800 feet and brine

depth of 2300 to 2800 feet and brine the extracted with ten, average total dissolved solids: condentration of about 350,000 mg/1, Groundwater most likely to be affected by an accidential discharge is at a depth of 30- to +40-feet within total dissolved solids concentration ranging from 700 to 800, mg/1. The discharge; plan addresses how spills, leake, and other, spicitential, discharges to the surface will be manaced.

Any Interested person may obtain Any Interested person may obtain further information from the Oil Con-servation, Division and may automit written comments to the Director of the Oil Conservation Division at the

address given above. The discharge plan application may be viewed at the the above address between 8.00 a.m.

the above address between 8,00 a.m. and 5,00 p.m., Monday, through Fri-day, Erior to ruling on any proposed discharge plan or is modification, the Director of the Oil Consevation DM-sion shall allow at least think (SO) cays after the date of publication of this notice, during which comments, may be submitted to him and public hearing may be faculated of the reasons why a hearing shall set forth the reasons why a hearing shall set forth the reasons

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

determines there is segments proce-interest. If the public hearing is held, the Director will approve or disapprove the proposed plan based on informa-tion available. If a public hearing is held, the director will approve of feasiers the removed plan based

The second secon Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October, 1991, STATE OF NEW MEXICO OIL CONSERVATION DIVISION WILLIAM J. LEMAY, Director Journal, December 9, 1991

charge is

RECEVED

be......, 1991, and the subsequent consecutive publications on..... Smithson oman a CIAL SEAL Sworn and subscribed to before me, a Notary Public in ennadett and for the County of Bernalillo and State of New DETTE ORTIZ JELIC-NEW MEXICO SECRETARY OF STATE PRICE..... 12-18.93 Statement to come at end of month. ACCOUNTNUMBER CZ1184

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

OIL CONSERVATION DIVISION Oil. CONSERVATION DIVISION Notice is hereby given that pur-suant to New Meado Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Buikling, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Tele-phone (505) 827-5800: (GW-68) - Williams Field Services

phone (505) 827-5800: (GW-68) - Williams Flaid Services Company, Sandy Fishler, Environ-mental Specialist, P.O. Box 59900, Salt Lake Chy, Utah 84158-0900, has submitted a discharge plan applica-tion for their Simms Mesa Compress-or Station located in the NW/4 NE/4, Santhen 22 Townethin 30 Month Section 22, Township 30 North Range 7 West, NMPM, Rio Arriba Pange 7 West, NMMPM, FID Amoda. County, New Maxico. Approximately 75 gallons per day of waste water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be effected by an excidential discharge is affected by an accidental discharge is affected by an accidential discharge is at a depth of approximately 160 feet with a total dissolved solids con-centration estimated to range from, 600 to 900 mg/1. The discharge plan addresses how splits, leaks, and other accidential discharges to the output of the manager

(GW-1) - Boomfield Refining Com-pany, David Roderick, Refinery Man-ager, P.O. Box 169, Bloomfield, New Mexico 87413, has submitted a rene-Nexico 87413, has submitted a rene-wal application for the previously approved discharge plan for its Bloomfield Rafinery located in the NW/4 SE/4 and the S/2 NE/4 and the NV/4 SE/4 and the S/2 NE/4 and the S/2 NW/4 and the N/2 NW/4 SW/4 and the SE/4 NW/4 SW/4 and the and the SE/4 NW/4 SW/4 and the and the SE/4 NW/4 SW/4 and the NE/4 SW/4 of section 26 Touriship 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The randwal application consists of an evalua-tion proposal of the refinary waste water system with the objective of eliminating all unlined storage facilities. Groundwater most likely to be ties, Groundwater most usery ab tes affected by any accidental spills is at a depth ranging from 10 to 30 feet and is a water zone directly caused by seepage from Hammond Dich. The dich water has a total dissolved solids concentration of approximately 200 mol. The reministranced is is at 200 mg/1. The previously approved discharge plan addresses how apila leaks, and other accidental dis-charges to be surface will be man-

(GW-74) - Haliburton Company Matt D. Ratilif, Environmental En-gineer, P.O. Drawer 1431, Duncan, Oklahoma 73536-0100, has submitted a discharge plan application for its ted a discretinge pacital application for all Hobbs Service Facility located in Section 7, Township 18 South, Range 39 East. NMPM, Lea County, New Mexico. Approximately 135 gallons per day of waste water is stored in holdw practe fiberatises texts minin fin below grade fiberglass tanks prior to disposal in an OCD approved offsite disposal in an OCD approved orisite disposal facility. Groundwater most likely to be affected by any accidental spills is at a depth of approximately 30 feet with a total dissolved spills concentration ranging from 300 to 600 mg/1. The application addresses how spills, leaks, and other accidental discharges to the surface will be 

# Affidavit of Publication

STATE OF NEW MEXICO ) ) 55. COUNTY OF LEA )

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

That the notice which is hereto attached, entitled

Notice_Of_Publication
and numbered in the
Court of Lea
County, New Mexico, was published in a regular and
entire issue of THE LOVINGTON DAILY LEADER and
not in any supplement thereof, once each week on the
same day of the week, forone (1)
consecutives weeks beginning with the issue of
October 30
and ending with the issue of

And that the cost of publishing said notice is the

sum of \$ 60.67

which sum has been (Paid) (Assessed) as Court Costs to 30 feet and is a water zone Ding emens Subscribed and sworn to before me this \_\_\_\_\_12th approximately 200 mg/1. The ....., **-19**...... November day of .. Jenner Notary Public, Lea County, New Mexico Sept. 28 94

My Commission Expires ......, 19.

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505)827-5800 (GW-68) - Williams Field Services Company Sandy Fishler Environmental Specialist P.O. Box 58900, Ser Lake City, Utan 84158-0900 has submitted a discharge plan application) for their Simms Mesa Compressor Station located in the NW/4 NE/4 Section 22, Township 30 North, Range 7 West NMPM, Ric Arriba County, New Mexico. Approximately 75 gallons per day of wastewater will be spred in an above ground steel tank prior to transport to an OCD approved off-site, disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 160 feet with a total dissolved solids concentration estimated to range from 600 to 900 mg/1. The discharge plan addresses how spills, leaks, and other addrenal discharges to the surface will be managed (GW-1) - Boomfeld Penning Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a renewal application for the previously approved discharge plan for its Bloomfield Refinery located in the NW/4 SE/4 and the S/2 NE/4 and the N/2 NE/4 SE/4 of section 27, and the S/2 NW/4 and the N/2 NW/4 SW/4 and the SE/4 NW/4 SW/4 and the NE/4 SW/4 of section 26, Township 29 North, Range 11 West, NMPM, San Juan County New Mexico, The renewal application, consists, of an evaluation proposal of the refinery waste water system with the objective of eliminating all unlined storage facilities. Groundwater most likely to be affected by any accidental spills is at a depth ranging from 10 directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids Concentration of previously approved discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. (GW-74) Halliburton Company, Matt D., Ratiff

Environmental Engineer, P.O. Drawer 1431, Duncar, Okiahoma 73536-0100; has Hacility located in Section 7.

Tomating Rocard in Socion NMPM Lea County, New NMPM Lea County, New New Co. Approximately 135 gallons per day of waste water is stored in below? grade barglass tanks prior to disposal in an OCD approved offsite disposal facility. Groundwater most likely to be affected by any accidental spills is a depth of pproximately 30 feet with a ptal dissolved solids concentration ranging from 300 to 600 mg/1. The application addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-15) - Marathon Road Water Station, C.W. Trainer, 8090 E. Kalil Dr., Scottsdale, Arizona, 85260, has submitted a renewal application for the previously approved discharge plan for their insitu extraction brine well facility. The Marathon **Road Water Station is located** in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, Fresh water is injected into the Salado Formation at an approximate depth of 1930 to 2400 feet and brine is extracted with an average total dissolved solids concentrations of about 321,080 mg/1, Groundwater most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids, concentration, ranging form 500 to of 3500 mg/1. The discharge plan addresses how spills, leaks, hand other accidental discharges to the

Surface will be managed. (BW-22) - Quality Brine, Inc., Stan. Watson, P.O. Box 75, Tatum, New Mexico, 88267, has submitted a renewal application for the previously approved discharge plan for their insitu extraction brine well acility. The Quality Brine Water Station is located in the SW/A SW/4, Section 20, Township 2 South, Range 36 East, NMPM, Lea: County, New Mexico Fresh water is injected nto the Salado Formation at an approximate depth of 2300 to, 2900 feet and brine is extracted with an average total dissolved solids concentration Groundwater most likely to be affected, by fan accidental discharge is at a depth of 30 to 40 feet with a total dissolved solids concentration ranging from 700 to 800 mg/1. The discharge plan addresses how spills mileaks, liand sother accidental discharges to the surface will be managed. obtain further information from the Oll Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00

p.m., Monday through Friday.

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Conservation Division sh allow at least thirty (30) da after the date of publication this notice during whi comments may be submitte to him and public hearing m. be requested by any interest person. Requests for pub hearing shall set forth the reasons why a hearing should be a start of the set of the se be held. A hearing will be he if the Director determines the is significant public interes If no public hearing is he the Director will approve disapprove the proposed pl based on information availab If a public hearing is held, t director will approve disapprove the proposed pl based on information in the p and information submitted the hearing.

GIVEN under the Seal New Mexico Oil Conservati Commission at Santa Fe, No Mexico, on this 21st day October, 1991.

STATE OF NEW MEXIC e echoroma duridivisio WILLIAM J. LEMA SEAL

Published in the Lovington Da Leader October 30, 1991.



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR

October 29, 1991

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

## <u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. P-106-675-374</u>

Mr. Stan Watson Quality Brine, Inc. P. O. Box 75 Tatum, New Mexico 88267

# RE: Discharge Plan BW-22 Quality Brine, Inc., Tatum Brine Station

Dear Mr. Watson:

The Oil Conservation Division (OCD) received and is in the process of reviewing the above referenced discharge plan renewal application. The following comments and requests for additional information are based on review of the application, dated September 25, 1991. The comments are numbered according the original OCD discharge plan renewal notification dated July 22, 1991.

## 1. Transfer of Commitment

The OCD acknowledges that Quality Brine will report all unauthorized discharges to the OCD within 48 hours of the event (WQCC Rule 5-208).

## 2. <u>Mechanical Integrity Testing</u>

The OCD Hobbs Office does not have a copy of your mechanical integrity test (MIT) for last year (1990?) as stated in your renewal application. However, you still need to perform a current (1991) MIT prior to approval of your renewal application. If the immediate test is performed using the open-hole method, then a pressure test isolating the casing from the formation is required within the next 1 1/2 years. The OCD requires a commitment from Quality Brine that you will perform annual MIT's and that you will conduct a casing isolation pressure test within the next 1 1/2 years.

Mr. Stan Watson October 29, 1991 Page 2

I will be in the vicinity of your brine facility during the week of November 4th. If you could schedule your MIT during that week I will be available to witness it. I will contact you verbally to discuss a date and time.

#### 3. Volumes of Injection Fluids and Brine

As stated in the original OCD discharge plan renewal notification, the OCD requires quarterly report listings, by month, of the volume of fluids injected and produced. You have informed the OCD that Quality Brine has a meter at the freshwater supply well, but no meter at the injection pump. If all produced freshwater is injected for brine production (ie. you do not sell freshwater), then you can submit required injection volumes from your freshwater meter readings. For production volumes, you should submit your sales figures. Please provide a commitment to submit the required monthly injection/production volumes on a quarterly basis.

#### 4. <u>Ouarterly Fresh Water Analyses</u>

The chemical analyses submitted by Quality Brine for the 5 freshwater wells is not acceptable. The water analysis reports submitted were for chlorides only. Quality Brine committed to analyze quarterly for both total dissolved solids (TDS) and chlorides in 3 freshwater wells (Griffin, Watson, and Union/Buckeye). In addition, the OCD required that the current quarterly water samples be analyzed for dissolved aromatic hydrocarbons (ie. benzene, toluene, ethylbenzene, and xylene).

Quality Brine is required to resubmit the water analyses for the Al Griffin, Danny Watson and Union Gas (formerly Buckeye) wells. Analyses will be for TDS, chlorides, and aromatic hydrocarbons. The water analysis reports must be signed by the person who performs the analysis. The reports that you submitted were not signed and are therefore not valid.

Quality Brine must continue to analyze the above 3 freshwater wells for TDS and chlorides on a quarterly basis. Results will be submitted to the OCD within 30 days of analysis. If there is no evidence of groundwater contamination by aromatic hydrocarbons then no additional analyses for these constituents will be required.

## 5. <u>Waste Oil Storage Pit</u>

Our records show that you closed a waste oil storage pit in August of 1985 as requested by the New Mexico Environmental Improvement Division. Is this the same pit located on the north side of your facility that you state is "nothing more than a caliche pit"? Regardless of the source of the stained soils, they must be excavated and disposed of at an approved OCD disposal facility. The pit may be left open at this time, but if future Mr. Stan Watson October 29, 1991 Page 3

> inspections indicate that it is being used for disposal of unauthorized wastes it will be required to be properly closed.

#### 6. Leaking Tank (Northeast Corner of Facility)

Quality Brine has committed to removing this leaking tank containing tank bottoms. The stained soils around this tank must be excavated and disposed of properly. Since the stained soils were contaminated by an RCRA exempt material (tank bottoms leaking from the tank) the soils are also exempt. The soils must be excavated and taken to an approved OCD disposal facility. Submit a schedule for removing the leaking tank and address how the stained soils will be remediated.

## 7. <u>Leaking Tanks (West Side of Facility)</u>

Placement of plastic containers beneath the loading valves is an acceptable containment method at this time. However, if future inspections reveal that this method does not contain spilled fluids than the OCD will require an alternative method. If the tanks themselves are leaking they need to be repaired, replaced or removed. The OCD acknowledges that Quality Brine will construct berms around all tanks to contain 1 1/3 the volume of the largest tank or all interconnected tanks.

## 8. <u>Saddle Tank</u>

The OCD requires that all saddle tanks have a pad and curb beneath them to contain spills. Quality Brine has proposed to place a plastic container beneath the loading valve. The OCD will accept this method of containment at this time. However, if future inspections reveal that this does not properly contain spilled fluids then Quality Brine will be required to install a pad and curb beneath this tank.

## 9. Brine Loading Area

Refer to comment for item number 7.

## 10. Emergency Pit

The OCD acknowledges that Quality Brine will close this pit by removing all trash and backfilling with clean soil.

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund." Enclosed is a copy of the WQCC Rule 3-114 effective as of August 18, 1991. Mr. Stan Watson October 29, 1991 Page 4

The Oil Conservation Division (OCD) requested a discharge plan renewal application for the Quality Brine Inc., Tatum Brine Station on July 22, 1991, prior to the effective date of the WQCC Rule 3-114. The OCD received your discharge plan (BW-22) renewal application on October 8, 1991, which is after the effective date of the WQCC discharge plan fee Regulation 3-114.

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

The \$50 filing fee is due immediately and is nonrefundable. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval.

Please make all checks out to the NMED - Water Quality Management and send to the OCD Santa Fe Office.

Submission of the above requested information will allow the review of your application to continue. If you have any questions, please do not hesitate to call me at (505) 827-5824.

Sincerely,

Kathirboun

Kathy M. Brown Geologist

xc: OCD Hobbs Office



CALCONSER. JUN DIVISION RED- JED

"91 OCT A AM 8 54

QUALITY BRINE P.O. BOX 75 TATUM, NM 88267

Kathy Brown Environmental Geologist P.O. BOx 2088 Santa Fe, NM 87504

RE: Renewal Application

Dear Kathy;

I have enclosed our Renewal application for Quality Brine.

In addressing the renewal plan, we have had no problem at our facility.

All tanks and equipment are original. We attempted to do things right the first time, and it has paid off, therefore, I, respectfully request that our original plan remain as our renewal plan. I will address the February 7th, inspection as follows.

The mechinal integrity test for the last year was sent to the HObbs, NM office. I have included a chart test @340#/4hr This is out standard working pressure.

We have the original water meter at our fresh water supply well. No meter on the injection pump. The Quality Brine joint venture was terminated in July'89. Danny Watson and I took sole ownership at this time. I only have brine sales since then. Total slaes are 32,709 barrells. The water analyses are included and will be filed upon request and/ or quarterly.

The "waste oil storage pit" is n othing more than a caliche pit. It was dug to provide material for the truck loading area. Two years ago a water trailer was rinsed out in the pit, so that welding repairs could be made on the water trailer. That is where the discolored soil came from.

The leaking tank(northeast cornorof facilities) is to be removed. It was used for tank bottom storage. We no longer clean oilfield tanks, and this old tank at our facility is not necessary. The 2-210 bbl tank on the west side of facility are used to store packer fluid(corrision inhibitor), KCL, surfactant or other fresh water additives. Occationally problems at well locations delay the use of the ecpensive addivites and we store them overnight until such problems are resolved plastic containers will be placed beneath loading values to catch any fluid.

The saddle tank is used for truck diesel fuel. A maximum of 1000 gal. is all we ever have on hand. A plastic container will be placed beneath nozzles.

At the brine loading area plastic containers will be placed beneath each loading value. The containers can be pumped dry by the last truck to load each day. The emergency pit has never been used. We run this facility by hand, there is no automation, Therfore, it is inspected daily. As we build dikes around our brine storage tanks, I would request to close the pit, as it has served no purpose other than a weed and trash problem.

yours very truly,

5 Zu Wit-10/3/91

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

5/91

DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES (Refer to OCD Guidelines for assistance in completing the application.) RENEWAL □ NEW Quality BRINE, INC. I. FACILITY NAME: Quality BRINS, INC. II. **OPERATOR:** TATUM NM. 88267 Boy 25 ADDRESS: Stral la )Atsol PHONE: 398-3490 CONTACT PERSON: LOCATION:  $5/\omega/4$  Section <u>ZO</u> Township <u>12</u> S. Range <u>36</u> E. III. Submit large scale topographic map showing exact location. IV. Attach the name and address of the landowner of the facility site. V. Attach a description of the types and quantities of fluids at the facility. VI. Attach a description of all fluid transfer and storage and fluid and solid disposal facilities. VII. Attach a description of underground facilities (i.e. brine extraction well). VIII. Attach a contingency plan for reporting and clean-up of spills or releases. IX. Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water. Х. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. XI. CERTIFICATION I hereby certify under penalty of law that I have personnaly examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

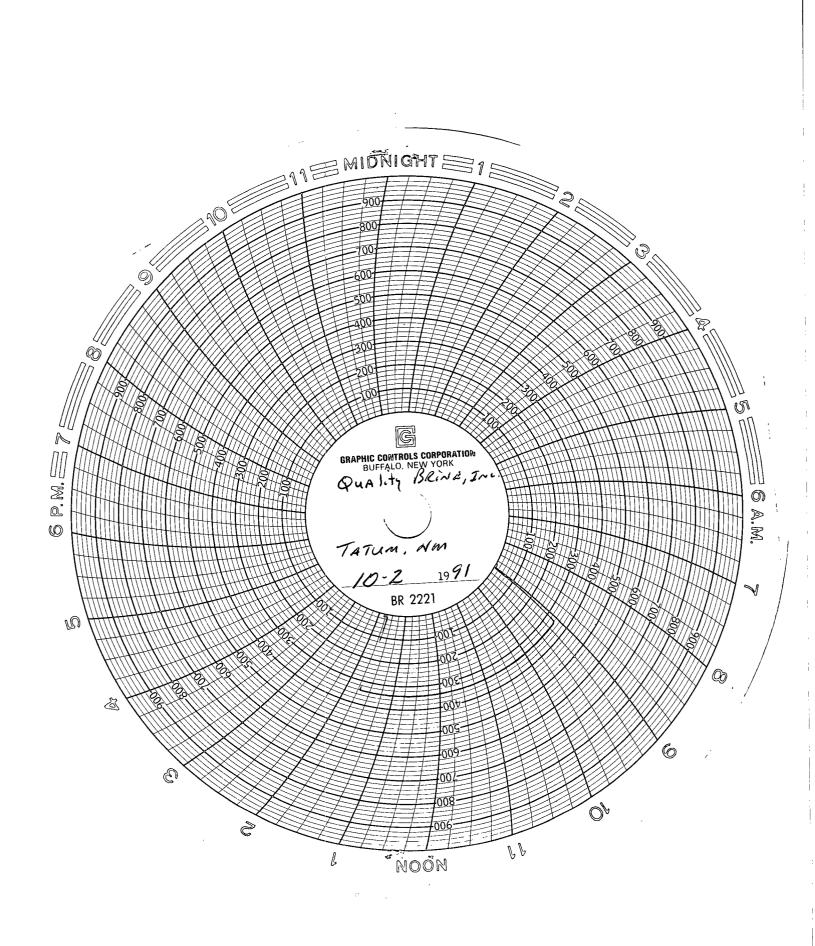
Name:	STAN WATSON	Title:	Co. Owner	
Signature: _	Stade		Date: 9-25-91	

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

Type of Fluids At Sality BRids Site T. 10-2-91 west A Horizontal 1,000 gAL. Dissel MAX. ON HANd. TANK 2-210 BBL. CORROSION INH. Biton For Hot oil UNITS, NEVER Full. Aug. About 100 BBIS. FRESH WATON OR KCL And INH. B. tor. 2-1000 BBI. BRINE Storage Tanks. North South - COATEd - Amount stored Aug. About 1000 BBI. TotAL. 1-1000 BBI. Fresh WATER TANK. - COAted - Amout stored Aug. About 600 BBL. TotAL. Pump House ) - 210 BBI. STORASE TANK ABANDON STORAGE TANK

EAST.

TO BE REMOVED.



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P. O. BOX 815 TATUM, NM 88267 PHONE (505) 398-4111

、 1			ANALYSIS			
Company A1 Griffin ·	- Owner	·····		Date Samp	es10/2/91	
Field				County	Lea	. <u></u>
Lease				State	New Mexico	
Well Submersible P	ump			Formation	Fresh Water	
Type of Water Fres	h - Domesti	.c		Water, B/	)	
Sampling Point Fauce	et			Sampled B	Gale Blackwell	
DISSOLVED SOLIDS					OTHER PROPERTIES	
CATIONS	mg/l		meq/1		PH	
Sodium, Na+(Calc)		÷ 23			Specific Gravity	
Calcium, Ca++		<del>;</del> 20				
Magnesium, Mg++		÷ 12.2			H2S	
Barium, Ba++		÷ 68.7			Total Dissolved	
Iron, Fe (Total					Solids	<u>,                                    </u>
					Total Hardness	
ANIONS						
Chloride, Cl-	115 ppm	÷ 35.5				
Sulfate, So <sub>4</sub> =	······································	÷ 48	<u></u>			
Carbonate, Co <sub>3</sub> =		÷ 30				
Bicarbonate, HCo <sub>3</sub> -		÷ 61	<u> </u>			
	<u></u>					
Remarks and Recommend	ationsD	omestic	water well	l located	pproximately 80 yards S	SW of
	b	orine wel	1.			

P. O. BOX 815
TATUM, NM 88267
PHONE (505) 398-4111

WATER ANALYSIS REPORT

Date Samples 10/2/91
CountyLea
StateNew Mexico
Formation Fresh Water
Water, B/D
Sampled By Gale Blackwell
OTHER PROPERTIES
/1 PH
Specific Gravity
H2S
Total Dissolved
Solids
Total Hardness
roximately 100 yards NW of Watson brine well

WATER ANALYSIS REPORT Company Allen Benson Date Samples 10/2/91 Lea Field County Lease\_\_\_\_\_\_State\_\_\_\_\_New Mexico Well\_\_\_\_Submersible Pump\_\_\_\_\_\_Formation Fresh Water Type of Water\_ Fresh - Domestic Water, B/D\_\_\_\_\_ Sampling Point Faucet Sampled By Gale Blackwell DISSOLVED SOLIDS OTHER PROPERTIES РН CATIONS mg/l meq/1 \_\_\_\_\_÷ 23 Sodium, Na+(Calc) Specific Gravity \_\_\_\_\_ \_\_\_\_\_ ÷ 20 Calcium, Ca++ ÷ 12.2 Magnesium, Mg++ H2S <u>+ 68.7</u> Barium, Ba++ Total Dissolved Solids Iron, Fe (Total Total Hardness ANIONS Chloride, Cl-100 ppm ÷ 35.5 <u>+ 48</u> Sulfate, So<sub>4</sub>= Carbonate,  $Co_3 =$ \_\_\_\_\_ ÷ 61 Bicarbonate, HCo<sub>3</sub>-Remarks and Recommendations Water well located approximately 100 yards SW of Watson brine well.

P. O. BOX 815 TATUM, NM 88267 PHONE (505) 398-4111

.....

	WATER A	ANALYSIS	REPORT			
Company 🔨 🗸 Watson			Date Sampl	es10/2/91		
Field			County	Lea		
Lease			State	New Mexico		
WellSubmersible Pump			Formation_	Fresh Water		
Type of WaterFresh - Domestic						
Sampling Point_Faucet			Sampled By	Gale Blackwell		
DISSOLVED SOLIDS				OTHER PROPERTIES		
CATIONS mg/1		meq/1		РН		
Sodium, Na+(Calc)	÷ 23			Specific Gravity		
Calcium, Ca++	÷ 20					
Magnesium, Mg++	÷ 12.2 _			H2S		
Barium, Ba++	÷ 68.7 _			Total Dissolved		
Iron, Fe (Total				Solids		
				Total Hardness		
	_					
ANIONS						
Chloride, Cl- 30.0 ppm	÷ 35.5 _					
Sulfate, So <sub>4</sub> =	÷ 48					
Carbonate, Co <sub>3</sub> =	÷ 30 _	<i></i>	<u> </u>			
Bicarbonate, HCo3-	÷ 61 _	<u></u>				
Remarks and Recommendations		located	approxima	tely 100 yards NE of brine well		

P. O. BOX 815 TATUM, NM 88267 PHONE (505) 398-4111

**PERMIAN** Treating Chemicals 

reating Chemicals	, 1110					P. O. BOX 815 TATUM, NM 88267 PHONE (505) 398-4111
	ji.	WATER	ANALYSIS	REPORT		
Company <u>J Buckeye Ga</u>	s Products	·····		Date Sampl	es <u>10/2/91</u>	
Field		·		County	Lea	
Lease				State	New Mexi	0
Well <u>Submersible</u>	Pump			Formation_	Fresh Wa	ter
Type of Water Fre	sh - Domesti	lc		Water, B/D	)	
Sampling Point Fau	icet			Sampled By	Gale Bla	ckwell
DISSOLVED SOLIDS					OTHER PROPERT	IES
CATIONS	mg/1		meq/1		PH	·
Sodium, Na+(Calc)		÷ 23			Specific Grav	ity
Calcium, Ca++	<u></u>	÷ 20	<u></u>			
Magnesium, Mg++		÷ 12.2			H2S	
Barium, Ba++		÷ 68.7	· ·	Total Dissolved		
Iron, Fe (Total					Solids	
			· · ·	<u> </u>	Total Hardnes	S
ANIONS						
Chloride, Cl-	170 ppm	÷ 35.5				
Sulfate, So <sub>4</sub> =		÷ 48				
Carbonate, Co <sub>3</sub> =		÷ 30				
Bicarbonate, HCo3-		÷ 61	· · · · · · · · · · · · · · · · · · ·			
Remarks and Recommen	dations	Business	water wel	1 located a	approximately	250 yards SE
		of Watsor	n brine we	11		

#### NOTICE OF PUBLICATION

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

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

(GW-68) - Williams Field Services Company, Sandy Fishler, Environmental Specialist, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Simms Mesa Compressor Station located in the NW/4 NE/4, Section 22, Township 30 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 75 gallons per day of wastewater will be stored in an above ground steel tank prior to transport OCD approved off-site disposal facility. to an Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 160 feet with a total dissolved solids concentration estimated to range from 600 to 900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-1) - Bloomfield Refining Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a renewal application for the previously approved discharge plan for its Bloomfield Refinery located in the NW/4 SE/4 and the S/2 NE/4 and the N/2 NE/4 SE/4 of section 27, and the S/2 NW/4 and the N/2 NW/4 SW/4 and the SE/4 NW/4 SW/4 and the NE/4 SW/4 of section 26, Township 29 North, Range 11 West, NMPM, San Juan County New Mexico. The renewal application consists of an evaluation proposal of the refinery waste water system with the objective of eliminating all unlined storage facilities. Groundwater most likely to be affected by any accidental spills is at a depth ranging from 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch The ditch water has a total dissolved solids concentration of approximately 200 mg/l. The previously approved discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-74) - Halliburton Company, Matt D. Ratliff, Environmental Engineer, P.O. Drawer 1431, Duncan, Oklahoma 73536-0100, has submitted a discharge plan application for its Hobbs Service Facility located in Section 7, Township 18 South, Range 39 East, NMPM, Lea County, New Mexico. Approximately 135 gallons per day of waste water is stored in below grade fiberglass tanks prior to disposal in an OCD approved offsite disposal facility. Groundwater most likely to be affected by any accidental spills is at a depth of approximately 30 feet with a total dissolved solids concentration ranging from 300 to 600 mg/l. The application addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-15) - Marathon Road Water Station, C. W. Trainer, 8090 E. Kalil Dr., Scottsdale, Arizona, 85260, has submitted a renewal application for the previously approved discharge plan for their insitu extraction brine well facility. The Marathon Road Water Station is located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1930 to 2400 feet and brine is extracted with an average total dissolved solids concentrations of about 321,080 mg/l. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to of 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-22) - Quality Brine, Inc., Stan Watson, P. O. Box 75, Tatum, New Mexico, 88267, has submitted a renewal application for the previously approved discharge plan for their insitu extraction brine well facility. The Quality Brine Water Station is located in the SW/4 SW/4, Section 20, Township 12 South, Range 36 East, NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 2300 to 2900 feet and brine is extracted with an average total dissolved solids concentration of about 350,000 mg/l. Groundwater most likely to be affected by an accidental discharge is at a depth of 30 to 40 feet with a total dissolved solids concentration ranging from 700 to 800 The discharge plan addresses how spills, leaks, mg/l. and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 aa.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October, 1991.

SEAL

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

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

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

July 22, 1991

Mr. Stan Watson Quality Brine, Inc. P. O. Box 75 Tatum, New Mexico 88267

RE: Discharge Plan BW-22 (formerly DP- 401) Quality Brine Inc., Tatum Brine Station

Dear Mr. Watson:

Enclosed are the materials which were left out of the certified letter sent on July 22, 1991 to Quality Brine by the Oil Consevation Division. The letter requests Quality Brine to submit an application for renewal of the discharge plan for their Tatum Brine Station. This discharge plan expired on October 9, 1990. The enclosed materials should help you assemble and submit your discharge plan application.

After you recieve and review the abovementioned certified letter, please feel free to contact me at (505) 827-5824 if you have any questions concerning renewal of your discharge plan.

Sincerely,

Kathy M. Brown Environmental Geologist

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

**OIL CONSERVATION DIVISION** 



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

July 22, 1991

#### CERTIFIED MAIL RETURN RECEIPT NO. P-757-737-759

Mr. Stan Watson Quality Brine, Inc. P. O. Box 75 Tatum, New Mexico 88267

RE: Discharge Plan BW-22 (formerly DP- 401) Quality Brine Inc., Tatum Brine Station

Dear Mr. Watson:

On October 9, 1985, the ground water discharge plan, BW-22 for the Quality Brine Inc., Tatum Brine Station located in Section 20, Township 12 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the Environmental Improvement Division (EID). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval expired on October 9, 1990. Authority to administer the brine program was transferred from the EID back to the Oil Conservation Division (OCD) in 1989 with staffing approved in 1990. Please note the new discharge plan number (BW-22), formerly DP-401, which will be the permanent designation used in all future correspondence.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. Since your discharge plan has expired, please submit your application for renewal of plan approval within sixty (60) days of receipt of this letter. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal. To assist you in preparation of your renewal application, I have enclosed an application form and a copy of the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Brine Extraction Facilities, revised May 1991, and a copy of the Water Quality Control Commission Regulations. Mr. Stan Watson July 22, 1991 Page 2

The OCD visited your operation on February 7, 1991, as part of an extensive multifacility inspection trip that week. Because of scheduling problems, and the numerous facilities visited, we were unable to notify you of the date and time of arrival in advance. Although not required, our agency generally notifies operators in advance giving time of arrival; in this instance it was not possible to do so.

The following comments are based on observations during the OCD site visit on February 7, 1991, and on additional requirements detailed in the guidelines. Please address these comments in your discharge plan renewal application.

#### 1. <u>Transfer of Commitment</u>

Notwithstanding the transfer of jurisdiction of brine wells to OCD, all prior commitments to EID concerning reporting and notification remain in effect. Note that all unauthorized discharges (ie. major leaks and spills), need to be reported to the OCD within 48 hours of the event (WQCC Rule 5-208).

#### 2. <u>Mechanical Integrity Testing</u>

Pursuant to revised OCD guidelines for discharge plans at brine facilities, all wells must be pressure tested (openhole) to 500 psi for 4 hours on an annual basis. A pressure test isolating the casing from the formation using either a bridge plug or a packer must be conducted at least once every 5 years or during well workovers. The last pressure test (open-hole) that the OCD has on file for the Watson Brine Well was performed on March 8, 1989. The results from a current pressure test will be required prior to the approval of any brine facility discharge plan application or renewal. If the immediate test is performed using the open-hole method than a pressure test isolating the casing from the formation is required within the next  $1 \frac{1}{2}$  years. An OCD representative must be on site to witness all pressure tests and we request 10 days before the test to allow us to make arrangements. Submit a proposal for testing and ensuring the mechancial integrity of the well. Also, submit information on any buried brine pipelines including age and material of the lines.

#### 3. <u>Volumes of Injection Fluids and Brine</u>

The OCD requires a quarterly report listing, by month, of the volume of fluids injected and produced for comparison to detect underground losses. The last quarterly report of volumes that the OCD has on file is for the third quarter of 1988. Submit a proposal and schedule for reporting injection

Mr. Stan Watson July 22, 1991 Page 3

> fluid and brine production volumes. Also, submit the date of first brine production and the total volume of brine produced to date. This information is necessary to evaluate subsidence potential at Quality Brine.

#### 4. Quarterly Fresh Water Analyses

Quality Brine committed to analyze quarterly for Total Dissolved Solids and Chlorides in three freshwater wells (Al Griffin, Watson, Union Gas) to identify possible groundwater contamination. The last record of these analyses that the OCD has on file is dated February 8, 1989. The OCD requires Quality Brine to sample and analyze these three wells for Total Dissolved Solids and Chlorides, submit the results to the OCD, and continue quarterly analyses. Because of the old waste oil storage pit and the presence of spilled hydrocarbons on the ground surface, the OCD also will require Quality Brine to analyze for dissolved aromatic hydrocarbons (ie. benzene, toluene, ethylbenzene, and xylene) in each of these wells. If there is no evidence of groundwater contamination by aromatic hydrocarbons then the OCD will not require additional analyses for these constituents. Submit a schedule for quarterly analyses and reporting of your freshwater monitor wells. Describe your sampling procedures and method of analyses.

#### 5. <u>Waste Oil Storage Pit</u>

The waste oil storage pit located on the north side of your facility is not closed to the OCD standards. Although the pit is no longer in use and the liquid hydrocarbons have been removed, you must dispose of the oil stained soils and properly close the pit. The stained soils must be either excavated and taken to an approved OCD disposal facility, or landfarmed on site and then placed back into the pit. Before conducting either alternative the soils must be tested to ensure that they fall below the listed EPA regulatory levels for benzene and all metals. The soils must be tested for the above constituents using the Toxicity Characteristic Leaching Procedure (TCLP). The pit itself needs to be backfilled and mounded. Submit a schedule and plan to properly close this pit within one year from the date of renewal of your discharge plan.

#### 6. Leaking Tank (Northeast Corner of Facility)

The tank located in the northeast corner of your facility near your brine well is leaking oil onto the ground surface. What is stored in this tank and what is it used for? This area must be cleaned up and the tank must be either repaired, Mr. Stan Watson July 22, 1991 Page 4

> replaced, or removed. The OCD requires all tanks to be bermed to contain 1 1/3 the volume of the largest tank or all interconnected tanks. Submit a plan and schedule for cleaning up this area, stopping all leaks, and containing any future spills.

## 7. Leaking Tanks (West Side of Facility)

The two tanks located immediately west of your brine storage tanks have oil either spilled or leaking around the loading valves. What is stored in these tanks and what is their purpose? This area must be cleaned up and the valves must have some type of containment to keep spilled oil off of the ground surface. If the tanks themselves are leaking then they must be either repaired, replaced, or removed. The tanks must be bermed to contain 1 1/3 the volume of the largest tank or of both tanks if they are interconnected. Submit a plan and schedule for cleaning up the area, stopping all leaks, and containing any future spills.

## 8. <u>Saddle Tank</u>

The saddle tank located next to the tanks in item number 7 has spilled oil on the ground surface below it. What is stored in this tank and what is it used for? This area needs to be cleaned up and a pad and curb installed beneath the tank and valves to contain spills. Submit a plan and schedule for cleaning up the area and containing any future spills.

## 9. <u>Brine Loading Area</u>

The loading area showed evidence of brine discharges to the ground surface, specifically, around the truck loading valves. This area must be cleaned-up and kept clean. Because of the existence of shallow ground water (18 feet) at your facility, this area must have containment to keep spilled brine off of the ground surface. Submit a proposal to contain spills at your brine loading area. Provide an explanation and diagrams detailing how spilled brine is to be contained; include paving and curbing where appropriate and indicate where the spilled brine drains to. Note that all new underground tanks (ie. sumps) are required to have positive leak detection.

## 10. <u>Emergency Pit</u>

Your unlined emergency catchpit located at the southeast corner of your facility needs to have all solid and liquid wastes removed. Because of the presence of shallow ground water at your facility you are required to either line your Mr. Stan Watson July 22, 1991 Page 5

> emergency catchpit or install a tank. All lined pits and below grade tanks must have positive leak detection. Submit a plan and schedule to clean out and upgrade your emergency catchpit.

Addressing the above items in your application for renewal of your discharge plan will accelerate the review and response time of your application. Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges a discharge plan renewal is not needed, please notify this office. If you have any questions, please do not hesitate to contact Kathy Brown at (505) 827-5824.

Sincerely,

MrsX\_K.

David G. Boyer, Hydrogeologist Environmental Bureau Chief

DGB/KMB

Enclosures

xc: OCD Hobbs Office

INV	ENTORY OF SOLUTION MINING WELLS OIL CONSERVATION DIVISION, 1991 BW-22 (DP-401)
I.	OPERATOR/LOCATION INFORMATION
	Operator: Quality Brine Inc. Stan Watson-aner
	Address: <u>P.O. Box 75</u>
	Tatum, New Mexico 88267 Phone: 398-3490
	Facility Quality Brine Watson # 1
	T. 125 R. 36E Sec. 20 SW 1/4 of SW 1/4 M (well)
	County: <u>Lea</u>
	Purpose of well (brine supply, LPG storage, potash dissolution)
	Brine supply
П.	DRILLING/SITING INFORMATION
	Contractor: Watson Brothers - Desert Drilling
	Date drilling started $4-93$ Date drilling completed $483$ Drilling method $7$
	Ground Surface Elevation <u>3991</u> ( <u>Pi-oprselev</u> ) Tetal doubt of help $\frac{3991}{2}$
	Total depth of hole $\frac{\partial 905'}{\partial 100}$
	Attach schematic of well, include open hole interval, perforations, etc.
	Type of drilling fluid _?
	Describe all casing tests performed to date 3-23-85: 300 psi for 12 hours, 2 trans.
	Both allempts lose 100 psi. Blamedon-faulty values. 29% falloff.
	(2) 9-19-85: 220psi for 24 hours. Lost 20psi (9% fall off) EIDS blamed on plumbing
	leaks. 3 10-16-86: 300 psi for 24 hours. Lost 10 psi (3% fo).
	\$ 10-28-88: 350 psi for 24 hours. Lost 10 psi (3% fo).
	@ 3-8-89: 260 psi for 4 hours. Lost 10 psi (4% fo).

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# CASING, TUBING AND CEMENTING RECORD

From	То	Size of Hole	Size of Casing	Weight per Foot	Sacks of Cement	Estima Top of	
0' -	53'	12"	95%	24 #-J55	50 "C" 4	8 Ga C 12	Sur force
0 - 3	1250	7%	5 %"	NBO Grade	250 literc	tr	
0 - 28	370'	4 <sup>3</sup> 4″	278"	N80 grad	د		

Is site within 1/2 mile of another well? Is so, explain. No other oil

Type of well-head equipment ?

.

Comments (include problems encountered while drilling, loss of circulation, deviation of hole from vertical, centralizers, used, tools lost or stuck, fracturing techniques used, etc.)

# **III. FORMATION INFORMATION**

# Formation Record

From To	Thickness	Formation (name, description)
0'-162'	162'	Surface sand, day, raliche?
163'-231'	68	Clay & Sand stone
231'- 945'	714'	Red Beds
945-2250'	13051	Red Beds \$ Shale
2250'- 2290'	40	Red Beds & Anhydrite
2290-29121	672'	Salt & Anhydrite
2767570' ] 2790-92' Smhy	ante Stringer	7

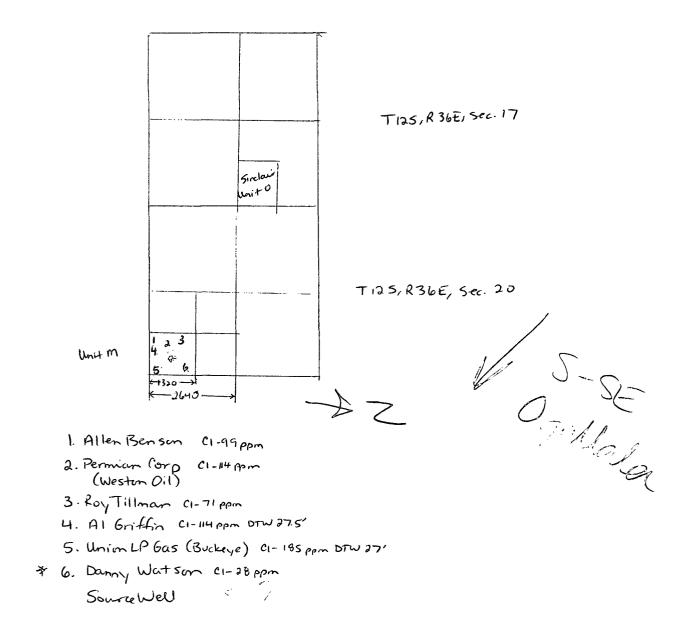
Logs (specify type) None - Formation information Source
unclear. Either from Bone Well drilling or
Sinclair Well No.1, T125, R36E, Sec. 17; I mile Not Broke well.
Identify where logs are on file $N/2$

#### IV. AQUIFER INFORMATION

# Aquifers in Immediate Area

From	То	Aquifer Description	Amount of Water entering hole	Quality of Water	
18'to 41' - 128'-	53'	sandy caliche white samd w/ clay layered sandstone	Completed not completed completed		
o EID Ru	setwee Islic A	zone terri in wells in 5 n 32' and 75: Jothice stated GW @	adepth from 30'+		over->
		h TDS between 700 irs Report for Tater		(24 ppm	
Note: I	f water	quality analysis are availabl	e please attach.*		
Source	of aquife	r description <u>Danny</u> Wa	Ison Well No.	<u>,</u>	
Source	of water	level and quality data do	11 log, OCD source	books	
Depth w	vater fir	st encountered during drillir	18 N/A for brine .	vel	_
Directio	nofwate	er gradient			_
Explain	any evic	lence of water contamination	(6 in section 2 Use 2 closest fre	-	<u>ve</u> llr
form	mito	ins to detect con	tamination & mon	itor -fresh	water,
(DTW 37	( <b>'</b>	. Monitor giverter			

Benser. J. Umar



# V. PRODUCTION/BRINE STORAGE INFORMATION

Method of production (describe fully) Water is injected down the annulus
at 300psi to salt and produced out tubing. leverse flow for 20 minutes
when pressure reaches 350 prie to clean tubing out.
·
Was well used previously for some purpose other than brine supply
If so, explain
Use of brine drilling fluids
Source of injection water (be specific) <u>Danny Watson Well</u> , 730'NE. Compteled Perfed from 18-36' + 128-162'; TD 162'. DTW upon completion
Perfed from 18-36 \$ 128-162; TD 162. DTW upon completion
Was 18'. TD date 2-14-83
Date of first production after drilling 4 - 1983
Volume of brine produced to date
Weight of salt removed to date
Calculated size and shape of cavity to date

Explain any evidence of subsidence and any subsidence monitoring

Brine storage facilities (describe) (West) 2- 1000 bbl brine tanks couted with flake line material (polyester). 1-1000 bbl fresh water tank coated with Epoxyphenolic (matcole # 850-851) Emergency catch pit - lined with bentomite tilled into the soil j. 45'x 45'x 6' deep. No automatic controls - hand check the equipmen Explain how brine storage pit is being monitored for leakage Have consent to monitor thresh water in 5 surrounding wells Explain brine loading procedures Brine is transferred from the well to the tanks via a 3" SDR-17 grade polyethlene pipe (120-long, 48" deep). Explain fresh water loading procedures N/A

# VI. ABANDONMENT/PLUGGING RECORDS

3

Date well abandoned/plugged \_///

Reason for well abandonment or plugging

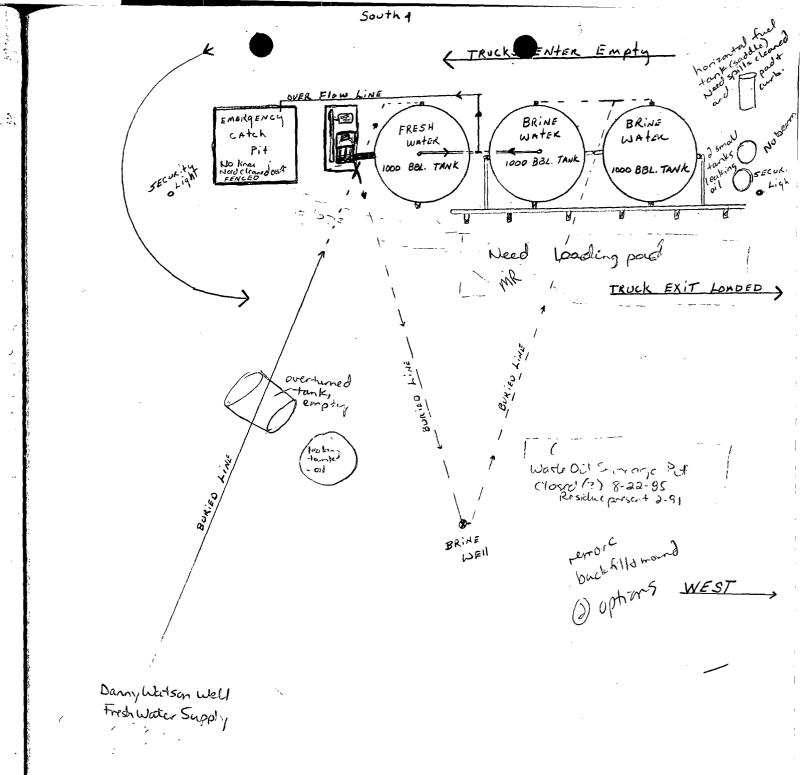
Method of plugging or proposed plugging (describe fully, include amounts of cement,

etc. top, plug type, depth, etc.)

List all conduits in the area of review. Include completion and plugging records.

QB- Quality Brine

**CHRONOLOGY OF EVENTS** VII. 7-83: QB submits DP / supplements dated June 9 & August 28 12-8-83: EID in forms QB need more into for DP (ie waar Party) 1-5-24: OB submits letter detailing correspondence & supplying add info, 2-23-84: QB submits Assurance of Discontinuance (4-10-34 signed by Wace) 7-18-84: ED requests additional into for DP 11-20-84. QB submits DP Report II 1-19-85: EID response to DB Report II (again, 4-4-95 EID responds) 9-19-95: QB submits pressure chart & plans for emergency pit 9-26-85: EID OK'S 200 pressure test eventhough leak-off 10-9-85 ED approves DP (exp. 10-9-90) 9-8-86 ED wars of not compliging with monitor requirementer 1 11-19-87: " "again " 200-86 7-88: Last report on file for 3 freshwater monitoring wells 30-88 10-28-88: Last report on file for quarterly volumer



Quality Brine Totum, N.M.

WAS

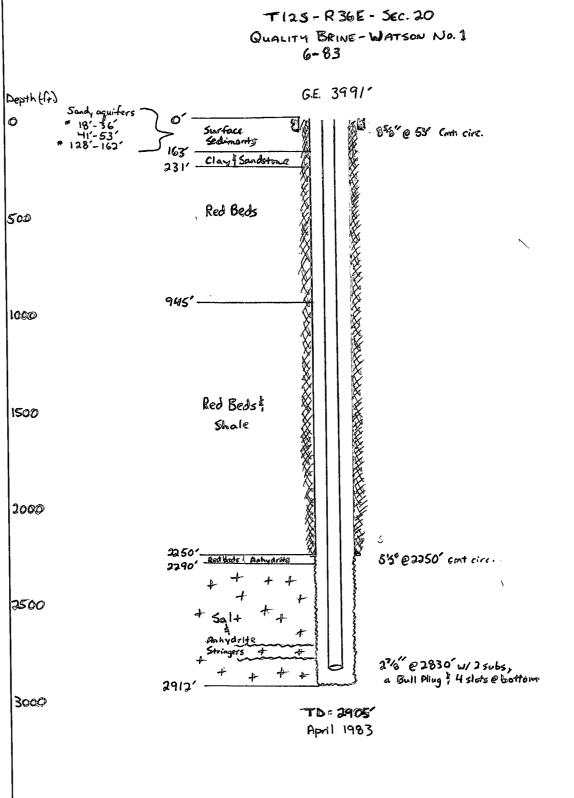
QUALITY BRINE

WATSON BRINE WELL









\* Completed zones in Wortson water supply worter well.

Union Gas (100yd SE)	TDS CI	184.6			1050 85.2	1099 85.2	1015 99.4	780 170.4	1099 SS 2	697.5 S6.0	590 143	
Watson (75ydNE)	705 61	- 28.4	50	9.CII 989	4.99 OCT	2.38 SE.2	693 8S·2	735 , 99.4	2.35 85.2	893.5 BS.2	287 102) ( 201 82	24
AI GAFTIN (75yd SW)	TDS CI P	- 113.6	L11 -	672 56.8	752.5 113.6	700 99.4	700 \$5.2	945 184.6	700 99.4	742 85.2	405. (32, 2504) -5045 -507	Erithin (Bur)
16	Darré	4/25/83 (@@)	- ( سع) (رحمس )	3/17/87 (J (00 C)	- 2812/01		4/14/88 (000)	7113188 (000)	(~~2) 88/et/01	58/8/e	11/2/97	

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STATE OF NEW MEXICO



# ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS

January 18, 1990

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

B&E, Inc. and Watson Treating PlantP. O. Box 75Tatum, new Mexico 88267

Re: \$5,000 One-Well Plugging Bond
B & E, Inc. and Watson Treating
Plant, Inc., Principal
Safeco Insurance, Surety
593' FSL and 639' FWL of
Sec. 20, T-12-S, R-36-E, Lea County
Bond No. 2980227

Gentlemen:

The Oil Conservation Division hereby acknowledges receipt of and approves the duplicate bond on our new bond form.

Sincerely, WILLIAM J. LEMAY, Director dr/

cc: Oil Conservation Division Hobbs, New Mexico

> Safeco Insurance P. O. Box 39239 Phoenix, Az. 85069

OIL CONSERVATION DIVISION RECEIVED

'90 JAN 16 AM 10 12

STATE OF NEW MEXICO

#### ONE-WELL PLUGGING BOND

FOR CHAVES, EDDY, LEA, MCKINLEY, RIO ARRIBA, ROOSEVELT, SANDOVAL, AND SAN JUAN COUNTIES ONLY

	DUPL	ICATE	ON	NEW	BOND	FORM
BOND NO.	2980	227				4
AMOUNT OF	BOND	\$5,00	0.00	00		
COUNTY	Lea					

Form 0 & G B-1 Adopted 6-17-77

Revised 11-01-89

NOTE: For wells less than 5,000 feet deep, the minimum bond is \$5,000.00\* For wells 5,000 to 10,000 feet deep, the minimum bond is \$7,500.00\* For wells more than 10,000 feet deep, the minimum bond is \$10,000.00

\*Under certain conditions, a well being drilled under a \$5,000.00 or \$7,500 bond may be permitted to be drilled as much as 500 feet deeper than the normal maximum depth, i.e., a well being drilled under a \$5,000.00 bond may be permitted to go to 5,500 feet, and a well being drilled under a \$7,500.00 bond may be permitted to go to 10,500 feet. (See Rule 101)

File with Oil Conservation Division, P. O. Box 2088, Santa Fe 87501

KNOW ALL MEN BY THESE PRESENTS:

B & E., Inc. and WAtson Treating Plant, Inc. A Joint Venture

That <u>A Joint Venture</u>		(An individual) (a partnership)
(a corporation organized in the State of	New Mexico	, with its principal office in the city
of <u>Hobbs</u> , State of	New Mexico	, and authorized to do business
in the State of New Mexico), as PRINCIPAL	, andSAFECO Insu	cance Company of America,
a corporation organized and Washington	existing under	the laws of the State of ized to do business in the State of New
Mexico, as SURETY, are held firmly bound	unto the State of New !	Mexico, for the use and benefit of the Oil
Conservation Division of New Mexico pur	suant to Section 70-2	-12, New Mexico Statutes Annotated, 1978
Compilation, as amended, in the sum of	Five Thousand & no	0/100**Dollars lawful money of the United
States, for the payment of which, well	and truly to be made	e, said PRINCIPAL and SURETY hereby bind
themselves, their successors and assigns,	jointly and severally,	, firmly by these presents.

The conditions of this obligation are such that:

ł

WHEREAS, The above principal has heretofore or may hereafter enter into oil and gas lease, or carbon dioxide (CO,) gas leases, or helium gas leases, or brine mineral 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,) gas leases, or helium gas leases, or brine mineral 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 one well not to exceed a depth of <u>less than 3,000 feet</u> feet, to prospect for and produce oil or gas, or carbon dioxide (CO<sub>o</sub>) gas or helium gas, or does own or may acquire, own or operate such well, or such well started by others on land embraced in said State oil and gas leases, or carbon dioxide (00,) leases, or helium gas leases, or brine minerals, and on land patented by the United States of America to private individuals, and on land otherwise owned by private being individuals, location of said well the identification and being 3 ft: from S. line and 639 feet from W. , Section \_\_\_\_ <u>20</u>, Township <u>12S</u> (Niekthin (South) (Here state exact legal footage description) Range 36È (East) (NASALA, N.M.P.M., \_ \_ County, New Mexico. <u>Lea</u>

NOW, THEREFORE, If the above bounden principal and surety or either of them or their successors or assigns, or any of them, shall plug said well when dry or when abandoned in accordance with the rules, regulations, and orders of the Oil Conservation Division of New Mexico in such way as to confine the oil, gas, brine, 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.

Gatt. Improve the Point Vonture       BURET         fb Brits       The Mark of Starts         Address       Starts         Starts       Definition         Address       Starts		
Address       Jature 1.00 AND STATUP       P.O. Box 399.39       Picenia, A.J. Sphöf         Address       Jature 1.00 Address       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Jinstebre       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Itte       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Itte       Itte       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Itte       Itte       Itte       Jature 1.00 Address       Jature 1.00 Address         Jinstebre       Itte       Itte       Itte       Itte       Jature 1.00 Address       Jature 1.00 Address <td></td> <td>Bry A</td>		Bry A
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STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS

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

## December 6, 1989

## <u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Stan Watson QUALITY BRINE, INC. P. O. Box 75 Tatum, New Mexico 88267

**RE:** Delegation of Responsibilities Brine Manufacturing Operations

Dear Mr. Watson:

On June 13, 1989, the Water Quality Control Commission (WQCC) transferred the responsibility for the administration and enforcement of Commission regulations at brine manufacturing operations, including all brine production wells, holding ponds and tanks, from the Environmental Improvement Division (EID) to the Oil Conservation Division (OCD). The OCD has jurisdiction over all manufactured brine once it is transported, used or disposed of off brine plant premises for use in or directly related to oil and gas operations regulated by OCD. OCD regulates brine injection through its Class II Underground Injection Control (UIC) Program if the brine is used in the drilling for or production of oil and gas. EID shall regulate brine injection through its UIC Program if the brine is used for other purposes.

Brine production facilities that were transferred to OCD's jurisdiction must operate pursuant to an approved and current discharge plan. The discharge plan renewal process will be continued by OCD Environmental Bureau Staff. Approximately eight (8) months before the expiration date of an approved discharge plan, the discharger will be notified of the pending expiration of the plan. The discharge plan review process can, depending on circumstances, take several months. If the holder of an approved discharge plan submits a renewal application at least 180 days before discharge plan expiration, and the discharger is in compliance with his approved plan on the date of expiration, then the existing plan will not expire until the renewal application has been approved or disapproved. Mr. Stan Watson December 6, 1989 Page -2-

Guidelines to aid you in determining what will be required for the renewal of your discharge plan are bring prepared. When the guidelines are finalized, they will be supplied to each operator of a brine production facility.

The OCD requires that any person, firm corporation or association that is in ownership of an oil, gas, or service well in the State of New Mexico shall furnish the Division with a surety bond in an amount prescribed in the OCD regulations. The current bond for well less than 5000 feet deep in Chaves, Eddy, Lea and Roosevelt Counties is \$5000. I am enclosing the OCD bond forms for your use. All surety bonds previously submitted to the OCD did not include brine wells. Those surety bonds submitted to the EID must be changed to the OCD. Once the proper bond form are received and approved, all other sureties and bonds can be cancelled.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

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Sincerely,

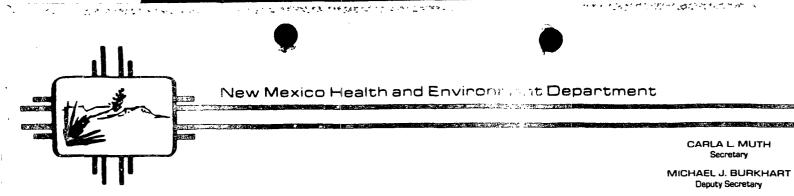
Inder

Rogér C. Anderson Environmental Engineer

RCA/sl

Enclosures

CC: Artesia District Office Hobbs District Office



RICHARD MITZELFELT Director

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April 3, 1989

Stan Watson Quality Brine, Inc. P. 0. Box 75 Tatum, NM 88267

Dear Mr. Watson:

1.

Thank you for your cooperation and assistance during our pressure test of your brine well on March 8th.

This pressure test was performed in partial fullfillment of the mechanical integrity requirements found in Part 5-204 of the New Mexico Water Quality Control Commission Regulations. Results showed no leakage from your brine well.

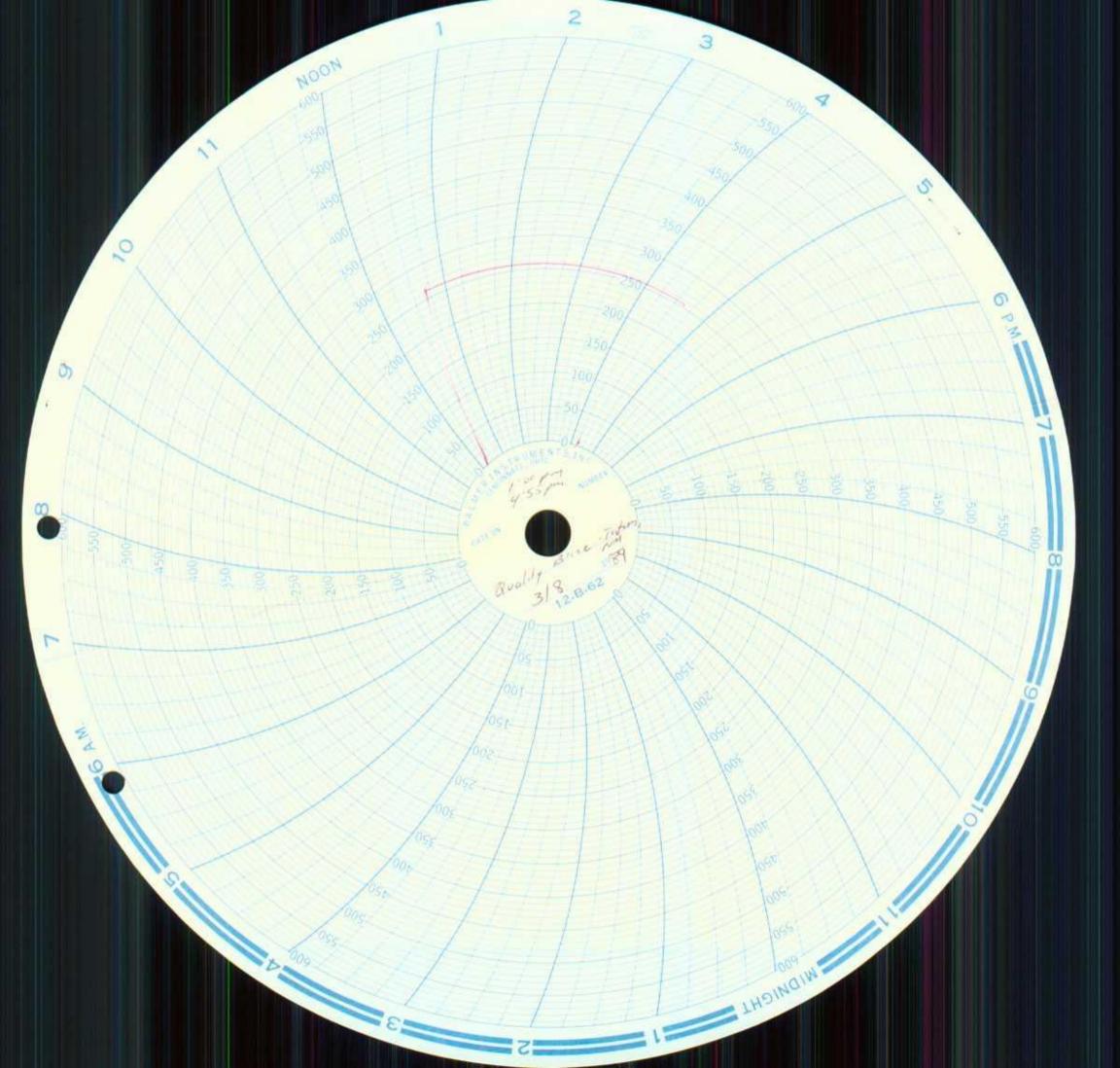
If you have any questions, please feel free to call me at 827-0027.

Sincerely,

John Parker Water Resource Specialist Ground Water Section

JP/pr

- ENVIRONMENTAL IMPROVEMENT DIVISION --Harold Runnels Building 1190 St. Francis Dr. Santa Fe, New Mexico 87





ENVIRONMENTAL IMPROVEMENT DIVISION Harold Runnels Bldg.-1190 St. Francis Drive Santa Fe, New Mexico 87503

> Richard Mitzelfelt Director

GARREY CARRUTHERS Governor CARLA L. MUTH Secretary MICHAEL J. BURKHART Deputy Secretary

NEW MEXICO HEALTH AND ENVIRONMENT DEPARTMENT

December 14, 1988

Stan Watson Quality Brine, Inc. P.O. Box 75 Tatum, New Mexico 88267

Dear Mr. Watson:

The Underground Injection Control staff of the New Mexico Environmental Improvement Division Ground Water Section would like to thank you for your cooperation during our recent inspection of Quality Brine, Inc. brine facility. A copy of the inspection form is attached for your reference.

No violations were noted during the inspection.

Thank you for your continued cooperation. Should you have any questions feel free to contact me (827-2902) or John Parker (827-0027).

Sincerely,

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Kevin Lambert Hydrologist Ground Water Section - UIC Program

KL/mw

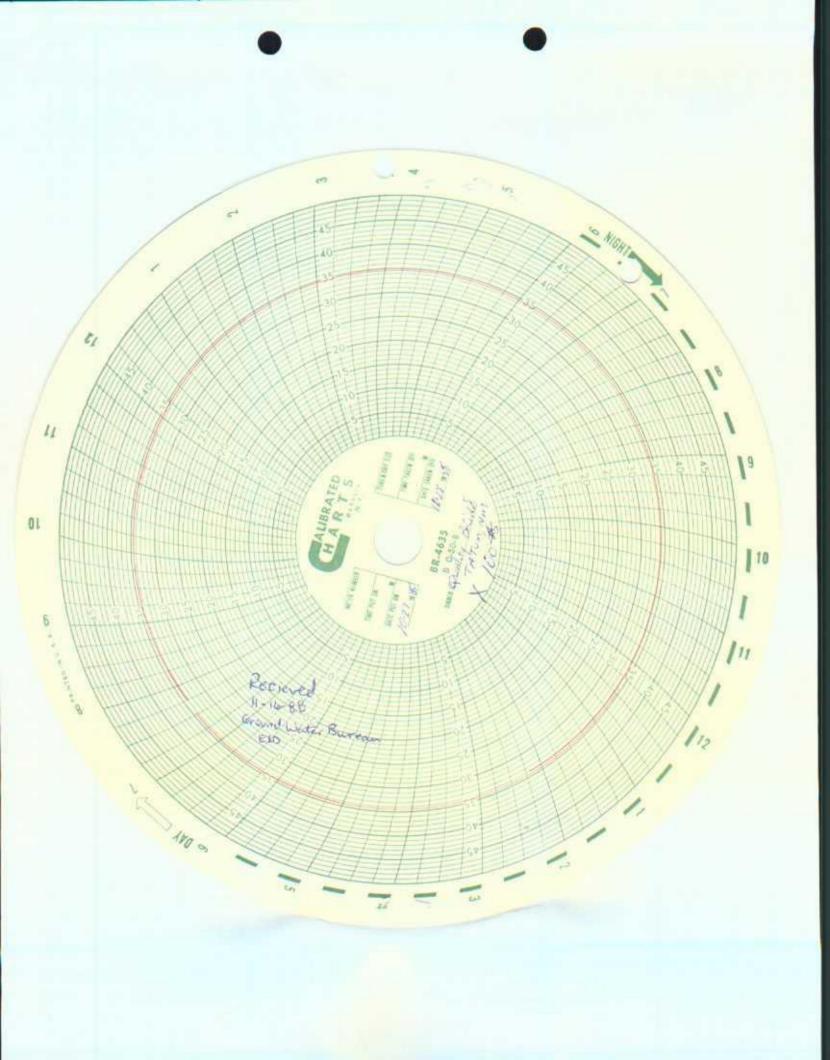
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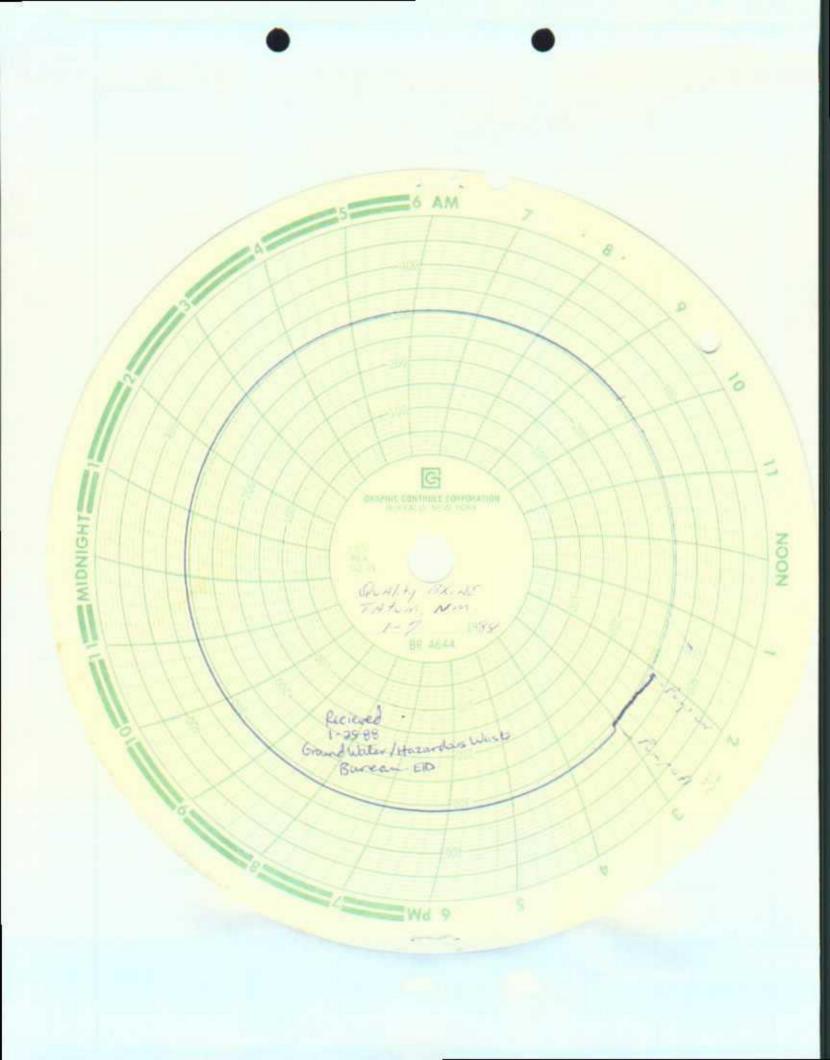
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No. of Samples Ion Na FIELD TRIP REPORT Κ GROUND WATER SECTION Ca County Eddy/Lea Mg SLD USER CODES **C1** Ground Water: 59300 HCO3 NO<sub>3</sub>, <u>HC. & Toxics:</u> 59600 UIC: 59500/ CO3 S04 FACILITY VISITED Name of Facility: 20 Brine Facilities of Climax Chemical TDS ']]]]]] Location: Location: Carlsbad/Hobbs in Southeast NM Discharge Plan Number: DP- See Below Type of Operation: Brine Production / Chemical Manufacture NO3+ NO2 NH 3 kjeld N //////// ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT As Lambert Ba EID Inspector(s): Date of Inspection or Visit: 12/5-8/ Cd CN Discharger's Representative Present During EID Visit: Cr Name: F Title or Position: ₽Ь Purpose of Visit: Hg V Evaluation of Proposed Discharge Plan Compliance Inspection of Discharge with Approved Plan Se c. Other (specify) Ag Inspection Activities During Field Visit: U v a. Inspection of Facilities or Construction (specify) Ra 226 Ra 228 '*||||||||||||*|| b. Sampling of Effluents (give sampling locations) Cu Fe Mn Phenols c. Sampling of Ground Water (give names or locations of wells) Sampled M.W. at Marathon Zn |`T | | | Al Β. d. Evaluation of geology, soils, water levels or other physical Съ characteristics of the location (specify) Мо Ni рH Conduct. e, Other (specify) Observations and Information Obtained during the Visit: The 20 Brine Facilities & Climas are listed below by DP#. See Individual File specifico ACTION REOUIRED 323 318 24 319 320 321 369 322

BRINE STATION INSPECTION FORM
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MONITORING WELLS
DEPTH     FT     STATIC WATER LEVEL     FT BELOW CASING       SAMPLED THIS VISIT     YES     NO     TEMP     Ec
COMMENTS <u>See No problems</u> <u>Business Slow</u>

- ---









Post Office Box 968 Santa Fe, New Mexico 87504-0968

## ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS Governor

> LARRY GORDON Secretary

> CARLA L. MUTH Deputy Secretary

December 31, 1987

DEPARTMENT

Stan Watson Quality Brine P.O. Box 75 Tatum, NM 88267

Dear Mr. Watson:

The Underground Injection Control staff of the New Mexico Environmental Improvement Division Ground Water Section would like to thank you for your cooperation during our recent inspection of Quality Brine brine facility. A copy of the inspection form is attached for your reference. Deficiencies noted during the inspection are as follows:

1. Spill collection system should be free of trash and debris.

2. Liner in spill collection pond not functional. Should replace with hypalon or other synthetic liner. (Not pvc plastic.)

3. Drainage to collection system needs improvement.

Thank you for your continued cooperation. Should you have any questions feel free to contact me (827-2902) or John Parker (827-0027).

Sincerely,

Kevin Lambert Hydrologist Ground Water Section

KL:JP:egr

Enclosure

# BRINE STATION INSPECTION FORM

1 · X

DATE <u>2/3</u> 1957 EID INSPECTOR <u>ambut Parker</u> FACILITY <u>Quality Rune</u> LOCATION <u>Tatum</u> FACILITY REP ON SITE <u>Non</u>
WELL OPERATION / well system reversable
WELL IS INJECTING: X THROUGH ANNULUS, THROUGH TUBING SOURCE OF FRESH WATER
WELL HEAD PRESSURE PSIG PUMP PRESSURE PSIG LEAKS AROUND WELL OR PUMP
STORAGE AREA
FOR PONDS: GENERAL LINER APPEARANCE
AMOUNT OF FREEBOARD ANY SIGN OF OVERFLOW OR LEAKS LEAK DETECTION SYSTEM FLUIDS DRY
FOR TANKS: GENERAL APPEARANCE <u>Look Good</u> LABLED PLAINLY <u>YES</u> NO can tell by piping BERMED TO PREVENT RUNOFF <u>YES</u> NO CHECK CONTENTS TO ASSURE PROPER FLUID/LABLE MATCH <u>Istalizing flow meters on tanks</u> NUMBER OF TANKS FOR BRINE <u>2</u> W FRESH WATER <u>F</u>
LOADING AREA PROPERLY GRADED AND BERMED TO CONTAIN SPILLAGE ANY EVIDENCE OF RECENT SPILLAGE DOES FACILITY HAVE A SPILL COLLECTION SYSTEM ANY EVIDENCE OF OIL SPILLING/DUMPING
MONITORING WELLS
DEPTHFT STATIC WATER LEVELFT BELOW CASING SAMPLED THIS VISITYESNO TEMPEC
COMMENTS Need to clean up spill collection syste remove trask & debris e.g. weeks, paper, will etc. De collection lined Need to improve training to collection system.

\_ |

	RECEIPT FOR CERTIFIE NO INSURANCE COVERAGE PROV NOT FOR INTERNATIONAL MA (See Reverse)	IDED	
506	Sent Otan Hatson		
U.S.G.P.O. 153-506	Street and No. Box 75	-	
G.P.O	P.O.: State and ZIP Code		
U.S.	Postage	S	
·	Certified Fee		
	Special Delivery Fee		<u></u>
	Restricted Delivery Fee		· ~
	Return Receipt showing to whom and Date Delivered		
1985	Return Receipt showing to whom, Date, and Address of Delivery		
June	TOTAL Postage and Fees	\$	
3800,	Postmark or Date	<b>8</b>	
Form 3800,		-	
PS F		~	



Post Office Box 968 Santa Fe, New Mexico 87504-0968

ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhart Director GARREY CARRUTHERS Governor

> LARRY GORDON Secretary

CARLA L. MUTH Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT

November 19, 1987

Stan Watson Quality Brine P.O. Box 75 Tatum, NM 88267

RE: Discharge Plan (DP-401) Monitoring and Reporting Requirements

Dear Mr. Watson:

On October 9, 1985, your discharge plan DP-401 was approved by the Environmental Improvement Division (EID). In this plan you made certain monitoring and reporting commitments (see attached Monitoring and Reporting Form). Your voluntary compliance has not been in accordance with these requirements for the past two years (see attachment). Therefore, you must submit complete and timely quarterly reports commencing on or before January 30, 1988 and continuing according to your approved discharge plan monitoring and reporting requirements. Please include on or before January 30, 1988 the pressure test results which were to have been submitted on or before October 31, 1987.

This represents EID's final attempt to gain voluntary compliance with the terms of your ground water discharge plan. Any future delays or omissions will not be tolerated and can result in fines of up to \$1,000 per day for a violation of the Water Quality Control Commission regulations.

If you have any questions regarding this matter, I can be reached by telephone at 827-2902 or at the address listed on the letterhead.

Sincerely,

T lt

Kevin Lambert Hydrologist Ground Water Section - UIC Program

KL:egr

Attachments

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

## Quality Brine Inc. Monitoring and Reporting (M & R) History

31. 20

Discharge plan DP-401 approved. M & R form attached. October 9, 1985 Submitted as part of discharge plan approval M & R due. October 15, 1985 process. January 15, 1986 M & R due. No report received. M & R due. No report received. April 15, 1987 M & R due. No report received. July 15, 1986 EID notified Stan Watson by telephone that no reports August 27, 1986 had been received. Mr. Watson stated business down and would sample and send in report. Incomplete M & R report received. September 3, 1986 EID notified Stan Watson by letter M & R report was September 8, 1986 incomplete. Missing volume of brine sold during guarter and no total dissolved solids analysis for three monitor wells. October 15, 1986 M & R due. No report received. October 23, 1986 Incomplete M & R report received. Missing results from two monitor wells (i.e., Griffin well and Buckeye Products well). January 15, 1987 M & R due. No report received. January 19, 1987 EID notified Stan Watson by telephone of delinquent and incomplete reports for 1986. Need to fulfill requirements for 1987. February 2, 1987 Incomplete M & R report received. Missing total dissolved solids analysis for three monitor wells. February 5, 1987 EID notified Stan Watson by telephone of incomplete report. Mr. Watson stated he would be sending results by end of February 1987. April 1, 1987 EID receives results for water supply well and Griffin well. Still missing results for Buckeye Products well. April 15, 1987 M & R due. No report received. May 7, 1987 Incomplete M & R report received. Missing results for Buckeye Products well. Resubmitted same results for water supply well and Griffin well received April 1, 1987. July 15, 1987 M & R due. No report received. October 15, 1987 M & R due. No report received. November 12, 1987 Incomplete M & R report received. Missing pressure

test results.

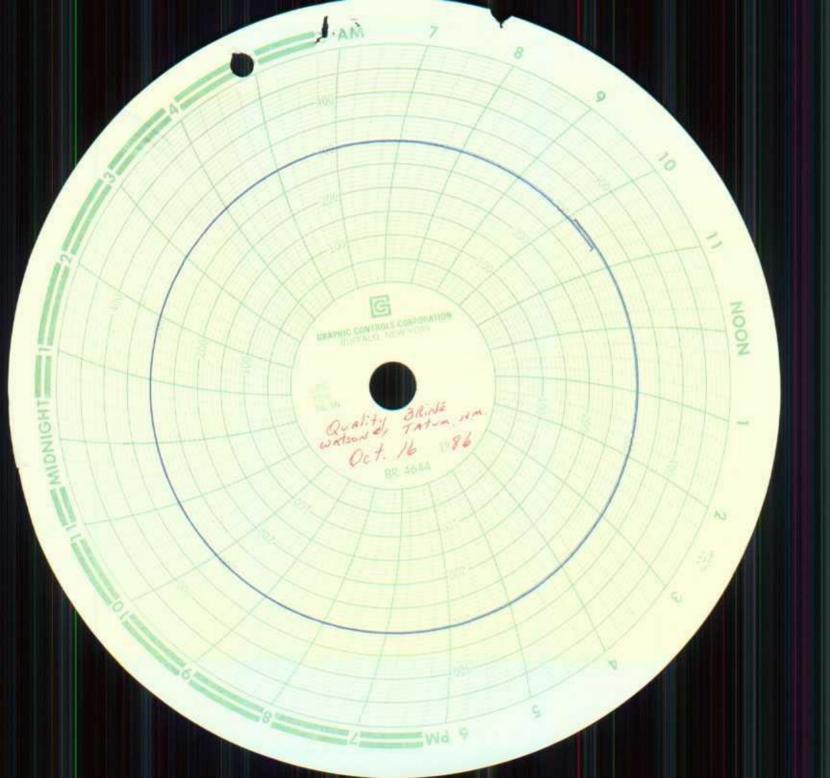
2/5/87 Quality Brine Que - Star Watson RE: Incomplete Monitoring Report 398-3490 for Jan'87 Missing TDS mg/l for Amonitor wells and water supply Not in left message 8:53 am Discuss the teficing definiency in TDS Will the be sending results pronto He doesn't want to keep being out - of-9:43 Am

compliance so will be submitting

resulto before end of February

1/19/87 Quality Brine Inc - Stan Watson RE's Reminder on Mt R Requirement 398-3490 - '86 was not good for you reporting; when you did report information was \$:56 Am Not in left message to return call 9:54 pm Ston leturn my call and I informed him that Quality Brine needs to be more comment conscientions of M+R requirement in '87. Quality was delignent several times in '86 and to get off to a good must the pay attention to your commitments. Send us men a report every quarter whether any brine produced a for sold so that EID records udicate you are compling w/ Mt R legurements, Read him their commitments and style stated next report Lue end of Jan'87. Kein Lambert

# BRINE STATION INSPECTION FORM DATE 12/9 1986 EID INSPECTOR BAKER FACILITY QUALITY BRINE LOCATION TATUM FACILITY REP ON SITE <u>Stankatson</u> COUNTY LEA DP-401. WELL OPERATION WELL IS INJECTING: X THROUGH ANNULUS \_\_\_\_\_ THROUS SOURCE OF FRESH WATER WAter Well \_\_\_\_\_ THROUS TRACE INJECTION/PRODUCTION LINES \_\_\_\_\_\_ hurled // Nells \_\_\_\_ THROUGH TUBING PSIG PUMP PRESSURE 250 PSIG WELL HEAD PRESSURE LEAKS AROUND WELL OR PUMP KIDALE. STORAGE AREA FOR PONDS: Nowe GENERAL LINER APPEARANCE AMOUNT OF FREEBOARD ANY SIGN OF OVERFLOW OR LEAKS LEAK DETECTION SYSTEM \_\_\_\_\_ FLUIDS DRY FOR TANKS: GENERAL APPEARANCE <u>Look to be IN good shape</u> LABLED PLAINLY <u>Yes</u> NO BERMED TO PREVENT RUNOFF <u>y</u> YES NO beens 50-60 ft either side of CHECK CONTENTS TO ASSURE PROPER FLUID/LABLE MATCH tanks NUMBER OF TANKS FOR 3 BRINE 2 FRESH WATER LOADING AREA XYES PROPERLY GRADED AND BERMED TO CONTAIN SPILLAGE $\underline{\times}$ NO NO ANY EVIDENCE OF RECENT SPILLAGE ANY EVIDENCE OF RECENT SPILLAGE DOES FACILITY HAVE A SPILL COLLECTION SYSTEM ANY EVIDENCE OF OIL SPILLING/DUMPING No evidence of spills MONITORING WELLS MONITORING WELLS MONITORING WELLS MONITORING WELLS system DEPTH DEPTH FT STATIC WATER LEVEL FT BELOW CASING SAMPLED THIS VISIT YES NO TEMP Ec COMMENTS Not affe operating continually only operate ON DEMAND, PRESENTLY little'OR NO DEMAND



ý ... N Quality BRINE TAtum. N.M.

October 17, 1982 BRINE SALES For:

OCT 23 1986 EROUND WATER/HAZARDOUS WAST

July - 300 BBI.

August - 200 BB1. SEPTEMBER - 250 BBI. 750 BBIS

Thank you, STAN WATSON Box 15 TATUM NOM 88267

398-3490

The slight increase AND decrease in pressure is due to changing temperatures.



WATER ANALYSIS REPORT

COMPANY	Quality	Brin	e					<u></u>							•.							175		NUMBER
COMPANY ADDRE	ss				<u> </u>				<u> </u>									- <del>1.</del>			D	те 10-	-6-8	6
FIELD											COUN	ITY O		ARIS EA	5Н		•					ATE NM		
LEASE OR UNIT				WELL	(S) N	AME	OR	NO.			WATE	R SO		RES	H W	ATIC	оn) ER				1			
DEPTH, FT. B	IHT. <sup>o</sup> f	SAMPLE	sou	RCE			TEMP,	, °F			WATE	R, BB	L/DA	Y	OIL	., 86	3L/C	YAC			GA	S, M	MCF/	DAY
DATE SAMPLED		Түре о								l							 Г	 1	C A 1				ISPO	
			PROL	DUCED		W/			NAL	YSIS	ΡΑΤ							_] 				<b>R</b> D		
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10 Mg <sup>++</sup>			1	1		1		1 1	•			-	1	1	1 1		,	•	• •		1	· ·	•	
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Fe <sup>+++</sup>		<u> </u>					I	1 1	<u> </u>		<u>   </u>				1		1						1	」co <sub>3</sub> ⁼
DISSOLVED SO	LIDS											DIS	SOL	.VE	D G	ASE	S							
CATIONS Total Hardness Calcium. Ca <sup>++</sup> Magnesium, Mg <sup>4</sup>	++			<u>me</u> 0 0	/!*			(	<u>mg</u> / ) )	<u>/1</u> * 		Carl Oxy	oon gen,	Dic , O:		, C(	02					0	n	ng/1* ng/1* ng/1*
Iron (Total) Fe Barium, Ba <sup>++</sup> Sodium, Na <sup>+</sup> (ca				<u> </u>	- 3				594			pH Spe • Tot	cific al D	Gr Disso		Sol	lids	(ca	alc.)		$\frac{1}{431}$		0	ng/l*
ANIONS Chloride, CI <sup></sup> Sulfate, SO4 <sup>-=</sup> Carbonate, CO3 Bicarbonate, HC Hydroxyl, OH <sup></sup>	:Oз <sup></sup>		 	56 7,3 0 6					000 350 0 366 0			Max	04 S (. Ca	Solu SO₄	idex bility Possi Possi	@_ _@_ @ ible	2 ( (ca	) ( ) ( () () () () () () () () () () () () () (	°C °C			.99 7.6	n	ne/1* ne/1* ne/1* ne/1*
Sulfide, S <sup>=</sup>				0					00			Res	idua	l Hy	/droc	arbo	ons						p	pm(Vol/\ pm(Vol/\
TOTAL SOLID		TATIVE						4	310			1163	Jud			.u1 (J1	5113						Þ	PHILE 01/ 5
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ANALYZED BY: BOB WALL				17	ATE -6-8	36	DIST	RIB	UTIO	4							0	FF:				R	ES:	

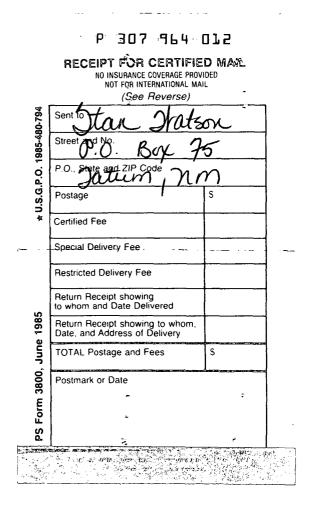


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WATER ANALYSIS REPORT

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Quality Br Company address FIELD LEASE OR UNIT						1756 DATE	
FIELD							
LEASE OR UNIT						10-6-8	۶
LEASE OR UNIT				COUNTY OR PARI	eu	STATE	0
				LEA	51	NM	
				WATER SOURCE (	EORMATION)		
DEPTH, FT. ( BHT. °F		WELL(S) NA	ME OR NO.				
DEPTH, FT.   BHT. °F		<u> </u>	- T		NE WATER		
	SAMPLE SO	DURCE	TEMP, <sup>o</sup> f	WATER, BBL/DAY	OIL, BBL/DAY	GAS, MMCP	/DAT
DATE SAMPLED	TYPE OF \	NATER			<u> </u>		
10-3-86		DUCED	SUPPLY		LOOD SALT	WATER DISPO	SAL
L000 Na <sup>+</sup> 20 15			VATER ANALYS E ION SYMBOL IN 5 0	S PATTERN DICATES me/I* SCA 5		15	<b>_20</b> ci1
			an a	the store of the			<b>ヿ</b> ゔ
10.0		1				1	
Ca <sup>++</sup>	╾╉╌╋╌╋╌╋	╶╋╾╃╌╃╾╄╼╋			┼┼┼┼┼┼	<del>╶╋╌╋╴╋╺╋</del>	HCO3
100. Mg <sup>++</sup>							
							7
			The second second				
							_ co3₌"
DISSOLVED SOLIDS				DISSOLVE	D GASES		
		/ <b>1</b> *	/ <b>,</b> *			0	
CATIONS		<u>me/l</u> *	<u>mg/1</u> *	· -	Sulfide, H2S	79.2	mg/l*
Total Hardness	-	<u>          800                         </u>			oxide, CO2	0 6	mg/i*
Calcium. Ca ++	-	<u>420</u> 380	<u>8400</u> 4636	Oxygen, O	2		mg/1*
Magnesium, Mg <sup>++</sup>	-	<u>&gt;80</u>	<u> </u>				
Iron (Total) Fe <sup>+++</sup>	-	0.54		PHYSICAL	PROPERTIES		
Barium, Ba <sup>++</sup>	-		105100	 all		6.95	
Sodium, Na <sup>+</sup> (calc.)	-	5439.5	125108	pH Specific G		$\frac{3133}{1.210}$	
	-			Specific G	olved Solids (calc.)	761610	
ANIONS	-				ndex $@$ <u>20</u> °C	+3.97	mg/I*
Chloride, Cl <sup></sup>		6085	216000	a Stability II	@°C		
Sulfate, SO4 <sup>=</sup>	-	150			bility @ <u>20</u> °C	20.4	me/l*
Carbonate, CO3 <sup>=</sup>		<u>150</u> 0	- <u>-7200</u>	000040010	@°C		
Bicarbonate, HCO3 <sup></sup>	-			Max CaSO	Possible (calc.)	1	me/l* me/l*
Hydroxyl, OH	•-	<del></del>	- <u>305</u> 0		Possible (calc.)		me/l*
Sulfide, S <sup>=</sup>	-	U	- <u> </u>		vdrocarbons		
Sumde, S	-			nesidual in	y di ocar bolis		ppm(Vol/
······	-			Residual H	ydrocarbons		ppm(Vol/
TOTAL SOLIDS (QUANTI	TATIVE)		361659				
REMARKS AND RECOMM		IS.			*NOTE: me/I	and mg/la	are comm
HEMANICS AND HECOMIN	- HUM HUM				used interch	angeably for	epm and
AT 20'C SEVERE CA		CCAL THE			respectively.	Where epm	and ppm
AT 20°C SEVERE CALCIUM S					used, correct specific grav	tions should	pe made
AT ZU C CALCIUM S	SULFAIE S	CALING 15	LINCLI		specific grav	/ii <b>y.</b>	
BAKER OIL TREATING REPR	ECENT					····	
JOE LEWIS	C SENTATIVE	E ADDRESS			TELEPHON	E	
ANALYZED BY: BOB WALLACE		fo-5-81	DISTRIBUTION			RES:	



#### **STATE OF NEW MEXICO**



TONEY ANAYA GOVERNOR

DENISE D. FORT DIRECTOR

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 8, 1986

Stan Watson Quality Brine P.O. Box 75 Tatum, NM 88267

RE: Discharge Plan (DP-401) Monitoring and Reporting Requirements

Dear Mr. Watson:

Thank you for submitting the chloride analyses required under your discharge plan as part of the August 15, 1986 Quarterly Report. However, your discharge plan requires that the Quarterly Report include chloride <u>and</u> total dissolved solids analysis for the three wells <u>and</u> a report on the volume of brine sold during the quarter. This report is required as long as the discharge plan is in effect even if no brine is produced or sold during the quarter.

I have enclosed a copy of the Monitoring and Reporting form for your discharge plan as a reminder of the reporting requirements. In addition to the Quarterly Report, the results of the yearly well pressure test are to be submitted with the October 15 Quarterly Report.

We hope you submit the delinquent analyses and information without delay and establish a routine for sampling and submitting the required reports. Failure to submit these reports on time is a violation of your plan and the New Mexico Water Quality Control Commission Regulations and may result in fines of up to \$5,000 per day.

I am looking forward to working with you and receiving and reviewing your Quarterly Reports. If you have any questions, please feel free to contact me at the address given on the letterhead or at 827-2902.

Suncerely,

Gerard Koschal Water Resource Specialist Ground Water Section

cc: Garrison McCaslin, EID District IV Manager, Roswell

GK:egr

Enclosure

EQUAL OPPORTUNITY EMPLOYER

P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 827-0020

STATE OF NEW HEACO DRANDUM OF MEETING OR CONVERNATION ENVRONNENT Date Time X Telephone Personal 8:15 Am 8-27-86 Other Parties Originating Party TOS STAN WATSON 505-398-3490 G. KoscHIL, UIC QUALITY BRINE INC. Subject Non compLiANCE OF MONITORING REQUIREMENT Discussion INFORMED MR WATSON THAT NO REPORTS ITAD BEEN RELEIVED FOR 1986 HE SAID BUSINESS WAS DOWN AND HE WOULD SAMPLE & SEND IN REPORT - 9/2/86 Shave letter ready to go out to Mr Watson if we don't get M+R Requirements in a week to rodays say 9/8/86 Kern Kambert OK received response 9/3/86 for @ quarter ending. 7/30/86 No reports for quarters ending 1/30/86 and 4/30/86 because business was down No Volume of Brine sold for Conclusions or Agreements quarter supplied 7/30/86/ stil noncompliant. Also just because business down possible g. W. contamination exist "/ must submit results every quarter for monitor wells whether producing forme or not fintent Distribution Signer Will be calling on writing to brote defeciency.

		نے ت	GUND WATER/HAZA BUREAU	RDOUS WAST	P. O. BOX 728 LOVINGTON, NM 8826 PHONE (505) 396-567
Company <u>Quality Brin</u>		ANALYSIS		led	8-28-86
Field					Lee
Leașse					
Well Union LP Gas Co	a come care de la service de	ميند السيارين			
Type of Water Domest					
Sampling Point		-			
DISSOLVED SOLIDS					PROPERTIES
CATIONS	mg/l	m	eq/l		
Sodium, Na+(Calc)			· · ·		fic Gravity
Calcium, Ca++		÷ 20		-1	
Nagnesium, Mg++		-		ис	<b>an</b> t dan disertan perintan di kana di ka
Barium, Ba++		÷ 68.7			Dissolved
Iron, Fe (Total)		· · · · · · · · · · · · · · · · · · ·			ls
110m, 10 (10tal)	· · ·	-			. Hardness
		-		10141	. natuness
ANIONS				•	
Chloride, Cl-		÷ 35.5			
Sulfate, So <sub>4</sub> =		÷ 48			
Carbonate, Co <sub>3</sub> =		÷ 30	· ·		
Bicarbonate, HCo3-		- ÷ 61			
C		-			•

	•		SE	P 03 1	RDOUS WASTE		P. O. BOX 728 LOVINGTON, NM 8826 PHONE (505) 396-567
		•		BOUTH	) REPORT		
•	Company Quality Brine						8-28-86
	Field				County_	Lea	• ·
	Lease						
•	Well <u>Al Griffin</u>				Formati	on	
	Type of Water <u>Domestic</u>	c - Sub	P	ump	Water,	B/D	
	Sampling Point				Sampled	By	Gale Blackwell
	DISSOLVED SOLIDS					OTH	ER PROPERTIES
	CATIONS	mg/l		m	eq/l	pH_	
	Sodium, Na+(Calc)		÷	23		Spe	cific Gravity
	Calcium, Ca++		÷	20	·····		
	Magnesium, Mg++		÷	12.2		H <sub>2</sub> S	
	Barium, Ba++		. <del>:</del>	68.7	·····	Tot	al Dissolved
	Iron, Fe (Total)			N,		Sol	ids
			-			Tot	al Hardness
	ANIONS						
	Chloride, Cl-	115.0	. <del>:</del>	35.5			
	Sulfate, So <sub>4</sub> =		. ÷	48	· · · · · · · · · · · · · · · · · · ·		
	Carbonate, Co3=		. ÷	30			
	Bicarbonate, HCo3-		. ÷	61			
	5						•

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eating Chemicals, Inc			<u>с</u> з	GUND MATER (NATA BUREAU	1209	LOVINGTON, NM 882
· •	WATER	ANA	LYSIS	REPORT		
CompanyQuality Bri	ne			Date Sam	p1	ed 8-28-86
Feield				County		Lea •
Lease				State		New Mexico
Type of WaterFresh	Water			Water, B	/ D_	
Sampling Point				Sampled	By <sub>.</sub>	Gale Blackwell
DISSOLVED SOLIDS						OTHER PROPERTIES
CATIONS	mg/l		m	eq/l		рН
Sodium, Na+(Calc)		. †	23			Specific Gravity
Calcium, Ca++		•	20	·····		
Magnesium, Mg++		÷	12.2			H <sub>2</sub> S
Barium, Ba++		. ÷	68.7		•	Total Dissolved
Iron, Fe (Total)	۰ 		•			Solids
	•	-				Total Hardness
ANIONS		<b>.</b> .		<u></u>		•
Chloride, C1-	28.0	÷	35.5			
Sulfate, So <sub>4</sub> =		-	48			
Carbonate, Co <sub>3</sub> =	· · ·	. ÷	30	· ,		
Bicarbonate, HCo <sub>3</sub> -		<b>-</b> * <sup>'</sup>	61			
· · ·		-				

No. of	
Samples, Ion	
Na Na	FIELD TRIP REPORT
) K	GROUND WATER SECTION
Ca	
Mg	SLD USER CODES County Leg
C1	Ground Water: 59300
PC03	NO <sub>3</sub> , HC, & Toxics: 59600
C03	UIC: 59500
	FACILITY VISITED
TDS	Name of Facility: OriduZana
1111111111111	Name of Facility: Quality Brine Location: Tatim NM
NO3+ NO2	1 Docación. Tatum NM
	Discharge Blas Nuclear DB
NH3	Discharge Plan Number: DP-
kjeld N	Type of Operation: Brine Stution
<u>1111141111111</u>	
As	ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT
Ba	EID Inspector(s): Sares/Baker,
Cd	Date of Inspection or Visit: 6/16/86
CN	Discharger's Representative Présent During EID Visit:
Cr	Name: None - Drive By
F	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)
	Inspection Activities During Field Visit:
	a. Inspection of Facilities or Construction (specify)
<u>Ra 226</u>	Looked at 3 struce facilities
Ra 228	•
Cu	b. Sampling of Effluents (give sampling locations)
Fe	NO
<u>Mn</u>	
Phenols	e de la construcción de la c
Zn	c. Sampling of Ground Water (give names or locations of wells)
<u> </u>	
Al	NO .
B .	
Co	d. Evaluation of geology, soils, water levels or other physical
Мо	characteristics of the location (specify)
Ni	
11111111111111	NO
pH	
Conduct.	e, Other (specify)
	L CA, Other (Specify)
·	
···	Observations and Information Obtained during the Visit:
	Drave around Station, Suifure looked Clean Nosign of
	E collect all ital sources creen roosign of
	Spillage Old oil Pits were dismanified and Cleaned op.
	Onerflow-Spillpit
	Overflow-Spillpit was dry. No Bermaround tanks
•	ACTION REQUIRED
	$\mathbb{E}_{1}[0]$

RECEIVED

OCT 17 1985

GROUND WATER/HAZARDOUS WASTE BUREAU

October 11, 1985

Paige Morgan Water Resorce Specialist P.O. Box 968 Santa Fe, NM 87504-0968

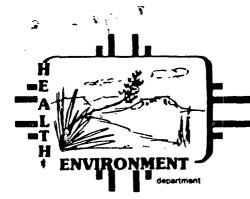
Dear Paige,

We would just like to say "Thank You" for all your help in acquireing our discharge plan.

Your professional attitude and understanding is greatly appreciated.

Sincerely,

Quality Brine, Inc.



# STATE OF NEW MEXICO

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

#### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 9, 1985

Stan Watson Quality Brine PO Box 75 Tatum, NM 88267

Re: Approval of Discharge Plan DP-401.

Dear Mr. Watson:

The discharge plan DP-401 for the Quality Brine station, located in the SW /4 Section 20, T12S R36E, in the town of Tatum, Lea County, New Mexico, is hereby approved. The approved discharge plan consists of:

- the materials listed in items 1. through 3. of the letter of July 18, 1984 from Paige Grant, EID Water Resource Specialist to Danny Watson, Quality Brine (see attached);
- 2) "Report II Quality Brine", dated November 20, 1984;
- 3) the chart from a pressure test conducted on the brine well on September 19, 1985.

The discharge plan was submitted pursuant to Section 5-101.B.3. 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.

The monitoring and reporting shall be as specified in the above-referenced materials. These requirements are summarized on the attached sheet. 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.

TONEY ANAYA GOVERNOR

DENISE D. FORT DIRECTOR Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."

Pursuant to subsection 3-109.G.4., this plan approval is for a period of five years. This **approval will expire on October 9, 1990,** and you should submit an application for renewed approval in ample time before that date.

Thank you for your cooperation during the discharge plan and review process.

Sincerely,

Richard Perkins Acting Bureau Chief Ground Water/Hazardous Waste Bureau

RP:PGM:pgm<sup>-</sup>

cc: John Guinn, EID District IV Manager

# P 612 426 509

	RECEIPT FOR CERTIFIE	ED MAIL	
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3800	Postmark or Date		
Form			
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# MONITORING AND REPORTING FORM

1 - 3

ALL BLANKS MUST BE COMPLETED.		DICABLE BOXES
DISCHARGE PLAN NUMBER: 401	ORIG. DP PEND	. APPROV:
SIC NUMBER:		RENEWAL:
NAME OF FACILITY: Quality Brine Inc.		
LOCATION OF FACILITY: 2 blks. w. of inter	section in middle o	f Tatum.
ALTERNATE OR PAST NAME OF FACILITY:	· · · · · · · · · · · · · · · · · · ·	
CITY OR CLOSEST TOWN:	USGS QUAD	: Tatum North M-91
COUNTY: Lea TWP: 12S	RGE: 36E	
CONTACT PERSON: <u>Watson</u> ,,	Stan TITI FIRST NAME	E:
ADDRESS OF CONTACT PERSON: PO Box 75	00267	
Tatum, NM 8	8207	
TELEPHONE: 505-398-3490		
TYPE OF FACILITY: brine production and sale	2S	
MEANS OF DISCHARGE ( LAGOON, LEACH FIE	LD, OTHER -SPECI	FY ):
injection well/ steel tanks for storage of brin	10	
REVIEWER: ( CURRENT ) Morgan	, <u>Paige</u>	
LAST NAME	FIR	ST NAME
DATE APPROVED: 10/9/85 DATE O	F EXPIRATION: 10/	9/90
MONITORING REQ: ( COMMENT, IF NECESSAR	Y, ON BACK )	
SAMPLING SITE STORET CODE OR ID (SAMP. SITE)	PARAMETER(S)	DATE <u>DUE</u>
water supply well	TDS, Chloride	April 15, July 15 Oct 15, Jan 15
Al Griffin well	12 11	8 8
Buckeye Products well	u u	11 11 51 11



OR ID ( SAMP. SITE )

1



PARAMETER(S) DATE <u>DUE</u>

brine storage	volume sold for quarter	as for TDS, Cl
injection well*	pressure test	10/15
•		

**COMMENTS:** \*Pressure test may be conducted by EID during inspection.

PRE - 1977 DISCHARGER	YES 	NO X	YES	NO
OTHER APPLICABLE PERMITS	:	RCRA RADIOACTIVE MAT. NPDES UST		X X X X

#### FOR EID USE ONLY

STATUS OF	DP:	
	ACTIVE:	Х
	WITHDRAWN:	
EXPIRED,	NOT RENEWED:	
	INACTIVE:	
NOT	YET APPROVED:	

SEND REPORTS TO:

-

-

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

# EJD BUCKSLIP

CHECK ONE: LETTER TO Guality Brine for ten signature KEMO TO PRESS RELEASE OTHER - approva SUBJECT: DRAFTED BY: 10000 Date CONCURRENCES: DATE DATE NAME; INITIAL REC'D APPROVED RC 10/7/85 Sect. Mar. 10/7/81 Erchard Perkins Bur. Chief Co Richard Holland Dep. Dir. Denise Fort · Director FINAL DECISION NEEDED BY Uctober 9 BECAUSE Cosmance date) specified 10/1/85 you appro cont Honting d Anorta sublicatio dry 19 is the car Was such ppr COMMENTS BY DRAFTER OR REVIEWER(S): brine well brought an and another C on assurance whitch is now Complitance



## **STATE OF NEW MEXICO**

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

September 26, 1985

TONEY ANAYA GOVERNOR

DENISE D. FORT

Stan Watson Quality Brine, Inc. PO Box 75 Tatum, NM 88267

Dear Mr. Watson:

Thank you for your letter of September 19th, in which you included the chart from a recent pressure test conducted on your brine well and reported on your plans to line your emergency pond.

I am still puzzled by the slight, continuous drop in pressure throughout the test. However, since it represents only about a 2% loss in pressure, I am fairly confident that the well is fundamentally sound. There is probably still some leakage at some point in the plumbing.

Pressure tests will be required on an annual basis once your discharge plan for this facility is approved. If three consecutive whole-system pressure tests continue to show the same slight but continuous bleed-off in pressure, you may be required to set a packer and run a pressure test on the casing alone. This could be done at some time when the well requires servicing in any case, so as to minimize the disruption to your operation.

For the time being, however, the information you have provided on the pressure test and your plans to line the emergency pond satisfy the final requirements of your discharge plan. The public notice announcing receipt at EID of your discharge plan was published on or before September 9th; EID is required to wait for 30 days after publication of a public notice before taking any further action. Assuming no public comment is received which would alter the agency's decision, your approval letter will be mailed out October 9th.

Thank you for your patience and cooperation in seeing this discharge plan process through.

EQUAL OPPORTUNITY EMPLOYER

Sincerely,

Paige Grant Morgan Water Resource Specialist

PGM:pgm

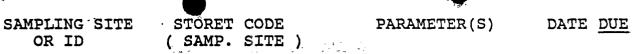
cc: John Guinn, EID District IV Manager.



# MONITORING AND REPORTING FORM

ALL BLANKS MUST BE COMPLETED.	CHECK ALL APPLICABLE BOXES
	ORIG. DP PEND. APPROV:
SIC NUMBER:	RENEWAL PEND:
	MODIFICATION: MODIFICATION PENDING:
NAME OF FACILITY: Quality Brine Inc.	
LOCATION OF FACILITY: 2 blks. w. of int	tersection in middle of Tatum.
ALTERNATE OR PAST NAME OF FACILITY:	
CITY OR CLOSEST TOWN:	USGS QUAD: Tatum North M-91
COUNTY: Lea TWP: 125	RGE: <u>36E</u> SEC: <u>20</u>
CONTACT PERSON: Watson	Stan TITLE:
LAST NAME	FIRST NAME
ADDRESS OF CONTACT PERSON: PO Box 75	
Tatum, NM	88267
<b>TELEPHONE:</b> 505-398-3490	
TYPE OF FACILITY: brine production and sa	ales
TYPE OF FACILITY: Drine production and so	
MEANS OF DISCHARGE ( LAGOON, LEACH F	IELD, OTHER <u>-SPECIFY</u> ):
injection well/ steel tanks for storage of b	rine
REVIEWER: ( CURRENT ) Morgan	, Paige
LAST NAME	FIRST NAME
DATE APPROVED: 10/9/85 DATE	OF EXPIRATION: 10/9/90
MONITORING REQ: ( COMMENT, IF NECESS.	ARY, ON BACK )
SAMPLING SITE STORET CODE OR ID (SAMP.SITE)	PARAMETER(S) DATE <u>DUE</u>
water supply well	TDS, Chloride April 15, July 1 Oct 15, Jan 19
Al Griffin well	n n n n n
Buckeye Products well	н и и и и и

OR ID



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brine storage	(a) Any and (b) The set of the	volume sold for generation	as for TDS, Cl
injection well*	aga an	pressure test	10/15
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•	e test may be conducted by		land and a second s
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OTHER APPLICABLE	PERMITS: RCR	A	X	na. 174 fills -
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	NPDE	S	X	
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FOR EID USE ONLY					

STATUS OF DP: ACTIVE:	••••••••••••••••••••••••••••••••••••••	
WITHDRAWN: EXPIRED, NOT RENEWED:	<u> </u>	
INACTIVE:		· · ·
NOT YET APPROVED:	<u></u>	

SEND REPORTS TO:

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

September 19, 1985

RECEIVED

# SEP 2 3 1985

<sup>GROUND</sup> WATER/HAZARDOUS WASTE BUREAU

Paige Morgan EID Water Resource Specialist P.O. Box 968 Santa Fe, NM 87504-0968

Dear Mrs. Morgan,

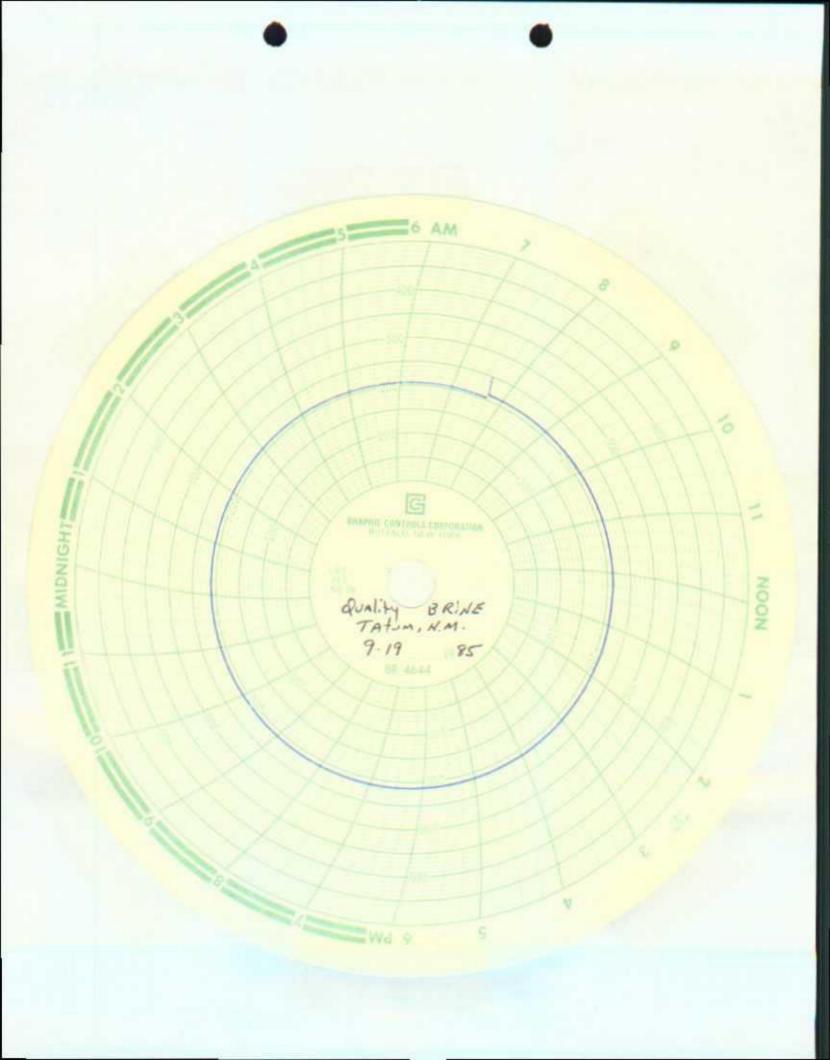
Here is a pressure chart as requested.

I have a roustabout gang set up to double line our emergency pit. They will double line the pit with 6 mill black plastic. Then cover it with "chicken wire" to keep the pit clear of trash. I'll send you a picture upon completion of this project.

Thank You,

Quality Brine Tatum, NM

SW/pr





# STATE OF NEW MEXICO

TONEY ANAYA GOVERNOR

DENISE D. FORT

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 30, 1985

Stan Watson Quality Brine P.O. Box 75 Tatum, New Mexico 88267

Dear Mr. Watson:

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.

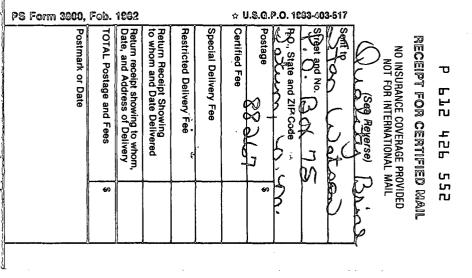
If you have any questions, please do not hesitate to contact me at the above address and telephone number (ext. 279).

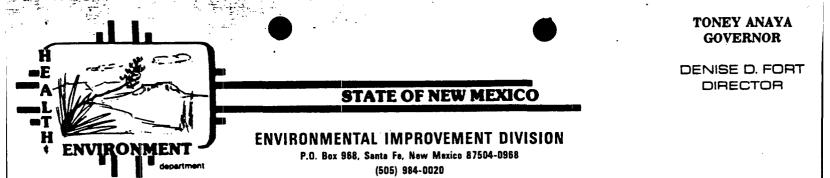
Sincerely,

loqué S. Hoag

Maxine S. Goad Program Manager Ground Water Section

MSG:jba





CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 30, 1985

Board of County Commissioners County of Lea Lovington, New Mexico 88260

Board of County Commissioners:

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

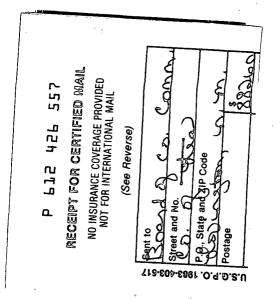
If you have any questions, please do not hesitate to contact me at the address and telephone number given above.

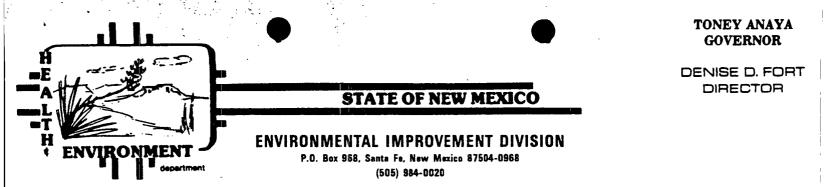
Sincerely,

the Stood

MAXINE S. GOAD Program Manager Ground Water Section

MSG: mp





CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 30, 1985

The Honorable John C. Gooch, Mayor 10 North Avenue A Tatum, New Mexico 88267

Dear Mayor Gooch:

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 above address and telephone number (ext. 279).

Sincerely,

Notine 5- Load

Maxine S. Goad Program Manager Ground Water Section

MSG: mp

	PS Form 3800,	Fod.	1982				⇔U	.S.G.P.O. 18	83-403	_	1			
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August 30, 1985

Lovington Daily Leader P.O. Box 1686 Lovington, New Mexico 88260

Dear Sir or Madam:

Please publish the enclosed public notice concerning discharge plan(s) in the classified legal section on or before September 9, 1985.

Send your statement and two (2) copies of the Affidavit of Publication to me at the above address.

Please print only the section(s) highlighted in yellow.

Thank you.

Sincerely,

5. 1/ 00,1 lalin

Maxine S. Goad Program Manager Ground Water Section

MSG:jba

## AUGUST 30, 1985

TO BE PUBLISHED ON OR BEFORE SEPTEMBER 9, 1985

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, Crown Building, Santa Fe, New Mexico 87504-0968; telephone (505) 984-0020.

(DP-399) BOWLIN'S INCORPORATED, 136 Louisiana, N.E., Albuquerque, New Mexico 87108, proposes to discharge domestic sewage effluent, into a 0.79 acre total evaporation lagoon, from its restaurant, Dairy Queen, and retail merchandise store located in Section 20, T9N, R15E, Torrance County, New Mexico. Total volume in gallons per day of discharge will be approximately 5000. Ground water most likely to be affected is at a depth of approximately 950 feet and has approximately 4000 parts per million of total dissolved solids.

(DP-400) INTEL CORPORATION, 4100 Sara Road, Rio Rancho, New Mexico 87124, has submitted a discharge plan for its proposed Fab IX semiconductor manufacturing facility. The facility is located in the N 1/2 of Section 32, T12N, R3E in Sandoval County, New Mexico immediately south of the existing Fab VII manufacturing facility (DP-225 approved May 26, 1982). Approximately 220,000 gallons per day of plant water will be neutralized and discharged to the city of Albuquerque Sanitary Sewer System. Additional wastes will be discharged into holding tanks enclosed in liquid tight, concrete vaults. These tanks will be periodically emptied with the waste being transported to and disposed of at an EPA approved disposal facility. Waste water will be delivered to the neutralization system or to the holding tanks through exposed pipelines in lined concrete opened trenches. Ground water is at a depth of approximately 260 to 280 feet with a total dissolved solids content of about 300 mg/l.

(DP-401) QUALITY BRINE, Stan Watson, P.O. Box 75, Tatum, New Mexico 88267, has submitted a discharge plan to cover operation of a brine extraction well and associated surface facilities in the SW/4 of Section 20, T12S, R36E in Lea County, New Mexico. The facility is currently in operation under the terms of an Assurance of Discontinuance granted by the Water Quality Control Commission. Brine is produced by injecting fresh water (total dissolved solids- TDS-content 780 mg/l) into dry salt beds of the Salado Formation at a depth of 2250 to 2920 feet. Brine is then returned to the surface and stored in two 1000 barrel steel tanks, from which it is pumped to tank trucks for sale on demand. Volume of brine sold varies widely; during September through November 1984, 26,133 bbls were sold. Ground water most likely to be affected by this operation is at a depth of 30 to 40 feet and has a TDS concentration of approximately 700 to 800 mg/l.

Page 1 of 2 pages

(DP-114) SACRAMENTO METHODIST ASSEMBLY, NEW MEXICO UNITED METHODIST CAMPS BOARD, INC., Don L. Forsman, Chairman, P.O. Box 188, Sacramento, New Mexico 88347, proposes to renew approved discharge plan DP-114 and continue discharging an average of 14,757 gallons per day of aerobically treated and chlorinated sewage effluent from the existing church camp located approximately 1/2 mile south of the village of Sacramento, Section 36, R13E, T17S, Otero County, New Mexico. The discharge will flow into a small tributary of Agua Chiquita Creek. The ground water most likely to be affected is at a depth of ranging from 50 to 100 feet, with a total dissolved solids concentration of 377 mg/l.

Any interested person may obtain further information from the Ground Water Section, Ground Water/Hazardous Waste 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 her 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.

age 2 of 2 pages





#### TONEY ANAYA GOVERNOR

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

Stan Watson Quality Brine PO Box 75 Tatum, NM 88267

Dear Mr. Watson:

Thank you for meeting with Steve Sares and me during our trip to Tatum last Thursday. You are to be commended for closing the disposal pond behind your facility, as you had agreed to do during our March inspection. I look forward to receiving a copy of the chart from your pressure test when you carry it out.

With regard to your proposal to line the emergency pit with bentonite: I have checked with suppliers of bentonite who have extensive experience in application of the material to ponds that are intended to contain a wide range of fluids, and they confirmed my impression that concentrated brine would cause the bentonite to flocculate, preventing it from forming an impermeable seal. It is theoretically possible, as I mentioned to you during our August 22nd meeting, that if you maintained a sufficient amount of fresh water in the pond you could dilute the brine sufficiently so that the bentonite would form an adequate seal. However, with the uncertainties involved in that method, I would find it necessary to require some type of monitoring system for the emergency pond. There are synthetic liners that are comparable in price to bentonite; I recommend that you investigate the use of such a material to line your emergency pond. It is to your advantage to design your facility in such a way that ground water quality will be protected; otherwise you could be liable for an expensive ground water restoration effort at a later point in time.

Let me remind you that EID approval or disapproval of your discharge plan is due on or before October 1, according to the schedule of compliance in your Assurance of Discontinuance. There is very little remaining to make your discharge plan approvable. Let me know if you see any problem with completing these last details in advance of the deadline.

Sincerely. Paige Grant Morgan

Water Resource Specialist

PGM:pgm

cc: John Guinn, EID District IV Manager

No. of Samples, Ion FIELD TRIP REPORT Na GROUND WATER SECTION К Ca County / 00 SLD USER CODES Mg Ground Water: 59300 C1 NO<sub>3</sub>, HC. & Toxics: 59600 HCO3 UIC: 59500 CO3 S04 FACILITY VISITED Name of Facility: Quality Brine TDS Location: Tatum NO3+ NO2 Discharge Plan Number: DP-rivne vet assissed Type of Operation: Unine mgg + sales NH3 kjeld N 111111 ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT As EID Inspector(s): Jake Morgan, Steve Sares Date of Inspection or Visit: 8/22/85 Discharger's Representative Present During EID Visit: Ba Cd CN · Name: Janny & Stan Watson Title or Position: partners Cr F PЪ Purpose of Visit: Hg a. Evaluation of Proposed Discharge Plan Se b. Compliance Inspection of Discharge with Approved Plan c. Other (specify) Ag Inspection Activities During Field Visit: U V a. Inspection of Facilities or Construction (specify) Soffnessed that unlined disposal pand in Unch of tanks had been for dioron. Ra 226 <u>Ra 228</u> X//////// Sampling of Effluents (give sampling locations) Cu ь. Fe Mn Phenols c. Sampling of Ground Water (give names or locations of wells) Zn //////// Al В d. Evaluation of geology, soils, water levels or other physical Co characteristics of the location (specify) Mo Ni pН e. Other (specify) Discussed final requirements of discharge yslan. Conduct. Observations and Information Obtained during the Visit:

ACTION REQUIRED

OUIRED

Called Quality to prompt them to respond to my April letter. Seft message with secretary. Parse Morgan 7/25/85: Jold Stan no'd be dropping by Ao see that the pond was closed and to complete the process of superday to the discharge plan: Friday months, \$123. 8/6/85: 8/23. Visited Quality. Disposal joit in back was closed - they sated they could complete the rest of the Prequise-8 22 85: ments ASAP. Ubnfed to know if then could line emergence pit af benfontte - N said & would check I specialists to see of brine spillag. abould be refained in a benfowte-Uned pit, and let him know.

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umples Ion | Na 2 FIELD TRIP REPORT ĸ GROUND WATER SECTIO ŧ ( Ca 4 County Cea 11 Mg SLD USER CODES 11 C1 Ground Water: 59300 · NO3, HC, & Toxics: 59600 11 HCO3 11 UIC: 59500 C03 " S04 FACILITY VISITED Name of Facility: Quality Brine 10 TDS Location: Jatum (a 60 min. of Hobbs.) 77777778777777777 1 NO3+ NO2 I NH3 Discharge Plan Number: DP-2000 Type of Operation: brine extraction well & associated | kield N surface facilities ENVIRONMENTAL IMPROVEMENT DIVÍSION FÍELD VISIT As EID Inspector(s): Taige Morgan, Steve Samo Ba 2 Date of Inspection or Visit: 3/26/85 Cd 11 CN Discharger's Representative Present During EID Visit: Cr Name: Danny Watson 4 Title or Position: co-owner of Stan Watson, Phil Withrow F 11 РЬ Purpose of Visit: Hg a. Evaluation of Proposed Discharge Plan Se (b. Compliance Inspection of Discharge with Approved Plan c. Other (specify) mechanical integrity test of bine well Ag | 11 U Inspection Activities During Field Visit: V a. Inspection of Facilities or Construction (specify) Looked at Unine well head storage tanks emergen Ra 226 sit. sit used for storage of waste oil from | Ra 228 frucks that have come to the factly to Good brine. Sampling of Effluents (give sampling locations) ь. Z | Cu Sampled brine from Yank ; source water 11 Fe 火 from Storage Hank. 11 | Mn Phenols (`c. Sampling of Ground Water (give names or locations of wells) 11 l'Zn ຄ []]]]][][[]]] source water well; water sampled from Storag Jank 2 A1 J . 0 Β. Evaluation of geology, soils, water levels or other physical 11 đ. Сο characteristics of the location (specify) Mo A french about 10' deep had been exca-vafed behind oil storaad pit. No oil appeared to be peepting to the walks of the trendth Other (specify) indicating that the line must  $\prime 1$ Ni TTTALLILL | pH 27 Conduct. e. be fairly effective Calthough it appeared Observations and Information Obtained during the Visit: The Watsons intend to close the waste \* impossible storage pit soon. to test conduce The clime well pressure yest showed in function of Slight bleed-off in pressure. Whitson Juinks TION REQUIRED This may be due to faulty dalves. meter ACTION REQUIRED Request affidadit of high-pressure fest run When I well Werras constructed. Recommend refest after faulty values are fixed.

REPORT 10: Steve Saves	- · ·	LAP	NUMBER	HM-0525
Ground Water & Har		U .		
'Environmental In Health & Environme				
P.O. Box 968 - Cro	wn Building	DATE	REPORTED	6/11/85 17A Initials
Santa Fe, NM 87504	-0968			NUMBER 59500
Well Location Address Qual	HyBrine Bo	x 75 Tatum	,NM 88	267
	tion Fresh Wat			
Well Owner/User Danny Wa				
Number of People Drinking Wate	er from Well O			, 
Collected 850326 Date	0937	By <u>S. Sav</u>	es	<u>EID</u> Agency
Date	Time	Name		Agency
Well Depth		рН	6,88	
Water Level		Conductivity	014	
		(Uncorrected)	910	umho/cr
Taste? Odor? Color? Collectors	Remarks	Temperature	17_	0 <sub>C</sub>
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PROJECT:				
From, A-H <sub>2</sub> SO <sub>4</sub> Sample:	ROUND WATER, HAZARDOUS W DUREAU Fro	ASTE n, NA Samp	le:	Date Analyzed
☐ Nitrate-N <sup>+</sup> mg/l	□ Ca	lcium	ma/1	
Nitrite-N		tassium		
Ammonia-N mg/1		gnesium		
Chemical mg/1				
oxygen demand		carbonate		
		loride		
		fate		
From, A-HNO3 Sample:	· · · · · · · · · · · · · · · · · · ·	tal Solids		
X ICAP Scan				
Metals by AA (Specify)	<b>(</b>			
This form accompanies NF: Whole sample (no	o filtration).	<	indicate f 3503260	
F: Filtered in fiel A-H <sub>2</sub> SO <sub>4</sub> : Acidified with 2	2 m1 conc H <sub>2</sub> SO <sub>4</sub> /1	ane filter		-107
A-HNO3: Acidified with S NA: No acid added	om1 conc HNO3/1			

. | | | ICAP ·SCREEN

Lab N	umber:	HM	525	
Date	Submitt	ed: <u>3</u>	129/85	
Ву <b>:</b>	Sare	<u>ه</u>		

1	Quality Brine Sample Code: Fresh Water Tank
	Sample Code: Fresh Water Tank
	Date Reported: 6/11/85
	By: J. Aslly
	10

Determination

Aluminum

Beryllium

Boron

Barium

Cadmium

Calcium

Chromium Cobalt

Copper

Iron

Lead

Magnesium

Manganese

Molybdenum

Nickel

Silicon

Silver

Strontium

Tin

Vanadium

Yttrium

Zinc

Concentration (µg/ml)

	2.10
	٢.10
	4.10
.24	
.24	<.10
110.	
	<.1D
	<.1D
. <u></u>	
	2.10
	<u> </u>
	4.10
23.	
	4.05
	2.10
	2.10
20.	
	4.10
1.0	
	<,10
	<.10
·	4.10
	-
<u></u>	<u> </u>

# ATOMIC ABSORPTION ANALYSES

Arsenic \_\_\_\_\_µg/ml Belenium \_\_\_\_µg/ml Mercury \_\_\_\_\_µg/ml

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REPORT 10: Steve Saves Ground Water & Fardous Wast Environmental in Ovement Div Health & Environment Departme P.O. Box 968 - Crown Building Santa Fe, NM 87504-0968	Prision $\Box$ ATE RECEIVED $3/29/R5$
Well Location Address Quality Brine	Box 75, TAtum, NM 88267
Point of Collection BC	ne Tank
Well Owner/User Danny Watson	· ·
Number of People Drinking Water from Well	0
Collected 85032-6 0950 Date Time	By <u>S, Sares</u> EID Name Agency
Well Depth	pH <u>GIB</u>
Water Level	(Uncorrected) OFF SCACEumho/cm
Taste? Odor? Color? Collectors Remarks	Temperature <u>15</u> Oc
BRINE - VERY HIGH TDS	Conductivity atumho/cm
PROJECT:	EGFINE.
From, A-H <sub>2</sub> SO <sub>4</sub> Sample:	From, NA_Sample: Date Date
Nitrate-N <sup>+</sup> mg/1 Nitrite-N	Calcium <sup>QRQUND</sup> WATER/MAZARDOUS mg/1 Potassium BUREAU mg/1
Ammonia-Nmg/1	Magnesiummg/1
Chemical mg/1 oxygen demand	Sodiummg/1 Bicarbonatemg/1
	Chloride <u>RECE</u> Mg/1 Sulfate
From, A-HNO3 Sample:	☐ Total Solids <u>/JUN 2 mg/1</u> ☐ Total Solids <u>/JUN 2 mg/1</u>
ICAP Scan Metals by AA (Specify)	UQUID WASTE/GROUND WATER
This form accompanies	) marked as follows to indicate field treatment: n) SSO3260950 5u membrane filter 2804/1 03/1

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ICAP ·SCREEN

Lab Number: HM 526 Date Submitted: 3/29/85 By: S. Sares

Sample Code: Quality Brine, Tatum NM
Date Reported: 6/17/85
By: D. Rolly
0 0

<u>Determination</u>

Concentration (µg/ml)

Aluminum	<1.0
Barium	٢.0
Beryllium	<1.0
Boron	410.
CadmLum	<1.0
Calcium	800.
Chromium	
Cobalt	< 1.0
Copper	
Iron	< 1.0
Lead	< 1.0
Magnesium	950.
Manganese	
Molybdenum	<u> </u>
Nickel	<u> </u>
Silicon	<u> </u>
Sllver	<u> </u>
Strontium	/2.
Tin	<u> </u>
Vanadtum	<1.0
Yttrium	<u> </u>
Zinc	< 1.0

# ATOMIC ABSORPTION ANALYSES

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Arsenic	µg/ա1
8olenium	jıg/ml
Hercury	µg/ml

ATE ECEIVED 3 27 85	AB NO. W.C1296	USER CODE  5930		HER: 5			
Ilection DATE	SITE INFORM-► ATION	Sample location	Brine, Box Z	5,⊤⊭	TUM	NM	88267
JARES/ELD	1	I Collection site description	<b>UDJER TANK</b>				T
					÷÷		<u></u>
ND GROUND WATEF NAL NM ENVIRONME PORT Crown Building, F Santa Fe, NM 875 Attn: 54000	NT IMPROVEMI O Box 968 04-0968				ROUNTY	ensi Ensi	TARDOUS WASTE
				Station/ well code			
AMPLING CONDITIONS	a na anti-tana anti-tana anti-tana anti-tana anti-tana anti-	e estatellaren blimmen in gener finnen sublimmer. Janu 1971	(		NNY	WAS	DN
□ Bailed □ Pump □ Dipped   🔀 Tap	Water level		Discharge		Sample		ATER
pH (00400) 6,88	Conductivity (Unc		Water Temp. (00010)	 7- °C	Conduct		°C (00094) μmh
······································	IF: Whole sample (Non-filtered)	Filtered in		nl H <sub>2</sub> SO,	,/L added		
No. of samples submitted / NA: No acid added NALYTICAL RESULTS fro	IF: Whole sample (Non-filtered) Other-specify:	¥F: <sup>Filtered ir</sup> 0.45 μme 850.32€	0938	nl H <sub>2</sub> SO,	,/L added		Date analyzed
Submitted NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected)	IF: Whole sample (Non-filtered) Other-specify:	▼ F: Filtered ir 0.45 μme ອ50.32€ Units Date analyze	ed F, NA	//	D	Units mg/i	Date analyzed
No. of samples submitted       ↓       ↓       ▶         Image: No. of samples submitted       ↓       ↓       ▶         Image: No. of samples submitted       ↓       ↓       ↓       ▶         Image: No. of samples NF, NA       ↓       ↓       ↓       ↓       ↓         Image: No. of samples NF, NA       ↓       ↓       ↓       ↓       ↓       ↓         Image: No. of samples NF, NA       ↓ <td>IF: Whole sample (Non-filtered) Other-specify:</td> <td>¥F: <sup>Filtered ir</sup> 0.45 μme 850.32€</td> <td>og38</td> <td></td> <td></td> <td>Units</td> <td></td>	IF: Whole sample (Non-filtered) Other-specify:	¥F: <sup>Filtered ir</sup> 0.45 μme 850.32€	og38			Units	
No. of samples submitted / N NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected) 25°C (00095)	IF: Whole sample (Non-filtered) Other-specify:	▼ F: Filtered ir 0.45 μme ອ50.32€ Units Date analyze	K         Calcium (00915)           K         Calcium (00925)           K         Sodium (00930)           K         Potassium (00935)	// 2 S	0 1.7 4.7 2.73	Units mg/I mg/I mg/I	4/15 4/15 7.78
No. of samples submitted / N NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected) 25 °C (00095) Total non-filterable residue (suspended) (00530)	IF: Whole sample (Non-filtered) Other-specify:	▼ F: Filtered ir 0.45 μme ອ50.32€ Units Date analyze	K         Calcium (00915)           K         Calcium (00925)           K         Sodium (00930)	// 2 S	0 1.7 4.7 2.73 76.4 102.1	Units mg/l mg/l _	415 4157.78 1157.78
No. of samples submitted / N NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected) 25°C (00095) Total non-filterable residue (suspended) (00530)	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	¥ F: Filtered ir 0.45 μme SSC32€ Units Date analyze _μmho	Ambrane Inter           Implication           Impli	// 2 S	0 1.7 4.7 2.73 76.4	Units mg/l mg/l mg/l mg/l	415 4157.78 1157.78
No. of samples submitted	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	¥ F: Filtered ir 0.45 μme SSC32€ Units Date analyze _μmho	Add         F, NA           Add         F, NA           Add         Calcium (00915)           Add         Magnesium (00925)           Add         Sodium (00930)           Add         Potassium (00935)           Add         Bicarbonate (00440)           Add         Chloride (00940)		0 1.7 4.7 2.73 76.4 102.1	Units mg/l mg/l mg/l mg/l	415 4157.78 1157.78
No. of samples submitted       □         Submitted       □         Image: NA: No acid added       □         NALYTICAL RESULTS from NF, NA       □         Image: Conductivity (Corrected) 25°C (00095)	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	¥ F: Filtered ir 0.45 μme SSC32€ Units Date analyze _μmho	Ambrane filter         Implicit and the second stress of		0 1.7 4.7 2.73 74.4 102.1 53.1	Units mg/l mg/l mg/l mg/l mg/l	4/15 4/15 15 1000 1000 1000 1000 1000 1000 1000 1000
No. of samples submitted	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	¥ F: Filtered ir 0.45 μme SSC32€ Units Date analyze _μmho	Ambrane filter         Ambran		0 1.7 4.7 2.73 74.4 102.1 53.1	Units mg/l mg/l mg/l mg/l mg/l	4/15 4/15 15 1000 1000 1000 1000 1000 1000 1000 1000
No. of samples submitted / N NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected) 25 °C (00095) Total non-filterable residue (suspended) (00530) Other: Other: Other: Mitrate-N + , Nitrate-N total (00630) Ammonia-N total (00610)	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	▼ F: Filtered ir 0.45 μme SSC.32€ Units Date analyze	Ambrane filter         Implicit of the second structure         Implicit of the second		0 1.7 4.7 2.73 74.4 102.1 53.1	Units mg/l mg/l mg/l mg/l mg/l	4/15 4/15 15 1000 1000 1000 1000 1000 1000 1000 1000
No. of samples submitted / N NA: No acid added NALYTICAL RESULTS fro NF, NA Conductivity (Corrected) 25 °C (00095) Total non-filterable residue (suspended) (00530) Other: Other: Other: Mitrate-N + , Nitrate-N total (00630) Ammonia-N total (00610)	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	▼ F: Filtered in 0.45 μme          SSC32€         Units Date analyze         μmho         mg/l         mg/l         mg/l	F, NA           Calcium (00915)           Magnesium (00925)           Sodium (00930)           Potassium (00935)           Bicarbonate (00440)           Chloride (00940)           Sulfate (00945)           Total filterable residue (dissolved) (70300)           Other:           F, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nitrate-N dissolved (00631)           Ammonia-N dissolved		0 1.7 4.7 2.73 76.4 102.1 53.1 783	Units mg/lmg/l mg/l mg/l mg/l mg/l mg/l	4/15 4/15 15 1000 1000 1000 1000 1000 1000 1000 1000
No. of samples submitted / NA: No acid added ////////////////////////////////	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	K F: Filtered ir 0.45 μme SSC32€ Units Date analyze μmho mg/l mg/l mg/l	Ambrane filter         Implicit of the second structure         Implicit of the second		0 1.7 4.7 2.73 76.4 102.1 53.1 783	Units mg/lmg/l mg/l mg/l mg/l mg/l mg/l	415 115 1.78 416 416 416 416 416 415 415 415 415 415
No. of samples submitted	IF: Whole sample (Non-filtered) Other-specify: m SAMPLES	K F: Filtered ir 0.45 μme SSC32€ Units Date analyze μmho mg/l mg/l mg/l mg/l	F, NA           Calcium (00915)           Calcium (00930)           Sodium (00930)           Potassium (00935)           Bicarbonate (00440)           Chloride (00940)           Sulfate (00945)           Total filterable residue (dissolved) (70300)           Other:           F, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nitrate-N dissolved (00631)           Ammonia-N dissolved (00608)		0 1.7 4.7 2.73 76.4 102.1 53.1 783	Units mg/lmg/l mg/l mg/l mg/l mg/l mg/l	415 115 1.78 416 416 416 416 416 415 415 415 415 415

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	SCIENTIFIC LAB 700 Camino de Sa	th and Engeneration ORATORY DrVISIO alud NE I 87106 — (505) 841-	N			VATER CHEMI OGEN ANALY	
DATE RECEIVED 3	29 85 NO	B WC-1297	USEFI CODE  59300	o 🗆 59600 🕅 O		500	
Collection DATE		SITE INFORM-► ATION	Sample location	Brine, Box 75	5, TATU	an Nim 88	367
0951 Collected by - Person	IAgency ORGAN/EID		Collection site description	hnk.		······	
SEND GR FINAL NM REPORT Cro TO Sar	OUND WATER	& HAZARDOUS IT IMPROVEME ) Box 968 4-0968	WASTE BUREA				
					Station/ well code		
SAMPLING C	ONDITIONS				Owner DA	NNY MOSLE	*
<ul> <li>Bailed</li> <li>Dipped</li> </ul>	🗋 Pump 🎉 Tap	Water level	<del>ان معند بری می</del> <del>انتشار با عام بریم.</del> محمد ا	Discharge		Sample type BRINE	
рН (00400)	6,18	Conductivity (Unco	orrected) Ε μmho	Water Temp. (00010)	°C	Conductivity at 25	°C (00094) µmho
No. of samples submitted		(Non-filtered) Other-specify:	Filtered in	mbrane filter	ml H₂SO₄/	Ladded	
NF, NA		I SAIVIPLES	Units Date analyze	d F, NA		Units	Date analyzed
<ul> <li>Conductivity 25 °C (00095</li> <li>Total non-filteresidue (susp (00530)</li> <li>Other:</li> <li>Other:</li> <li>Other:</li> <li>Other:</li> </ul>	)		μmho mg/l	<ul> <li>Calcium (00915)</li> <li>Magnesium (00925)</li> <li>Sodium (00930)</li> <li>Potassium (00935)</li> <li>Bicarbonate (00440)</li> <li>Chloride (00940)</li> <li>Sulfate (00945)</li> <li>Total filterable residue (dissolved) (70300)</li> <li>Other:</li> </ul>	<u>618</u> <u>50</u> <u>300</u> ,3 <u>94</u>	20 mg/l 20 mg/l 1 mg/l 157,2 mg/l 312.6 mg/l	4/15 4/15 137.4 4/16 4/16 75/7 5/7 5/7 5/7 5/7 5/9
Nitrate-N+, total (00620)				F, A-H <sub>2</sub> SO <sub>4</sub>			
total (00630) Ammonia-N Total Kjeldah ( Chemical ox demand (003 Total organic ( )	total (00610) I-N ygen 340)		. mg/l . mg/l . mg/l	<ul> <li>Nitrate-N + , Nitrate-dissolved (00631)</li> <li>Ammonia-N dissolved (00608)</li> <li>Total Kjeldahl-N</li></ul>		mg/l _ mg/l _ mg/l _	
Other: Other: Content	 		· · · · · · · · · · · · · · · · · · ·	Analyst	Date R	eported Review	vedby Slan



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 4, 1985

Stan Watson QUALITY BRINE P.O. Box 75 Tatum, NM 88267

RE: Completion of Discharge Plan according to Quality Brine's Assurance of Discontinuance.

Dear Mr. Watson:

Please extend by thanks to Danny Watson for his help and cooperation during our visit to the Quality Brine station on Tuesday, March 26th. I'm sorry we missed you on that trip.

Please note that according to the schedule in your Assurance, you were to have completed your discharge plan and submitted it for review at EID by March 29th. Completing the plan will entail only responding to my letter of January 18th and to this letter. Please respond as soon as possible, to be consistent with the terms of the Assurance.

1. As I discussed with Doris Watson by phone on April 2nd, the pressure test that we witnessed on your brine well was inconclusive, due to a small but continuous drop in pressure. In a good test we would expect to see an initial small (1 to 3%) drop in pressure, but then a stabilization. Therefore, in order to demonstrate the mechanical integrity of your brine well for purposes of the discharge plan, please submit an affidavit from the person who conducted the initial pressure test on your well. State the date, pressure and length of the test and a statement that the casing held the pressure throughout the test. It would also be helpful if you would check the valves on the well, replace them if necessary, and rerun the test to see if that was the only source of a leak. This will not be required as a condition of discharge plan approval but will be required within a year of discharge plan approval. If you could do it sooner, it would provide us with a greater measure of confidence that the well is sound.

Stan Watson April 4, 1985 Page 2

2. Danny Watson indicated that the pit which has been provided behind your tank area for disposal of oil, will be closed. He indicated that you would pump out the oil and recontour the pit. Since EID approval or disapproval of your discharge plan is scheduled on or before October 1, 1985, please notify me that this pit has been closed well in advance of that date.

I look forward to your early reply.

Sincerely,

hige Grant Storgan

Paige Grant Morgan Water Resource Specialist Ground Water Section

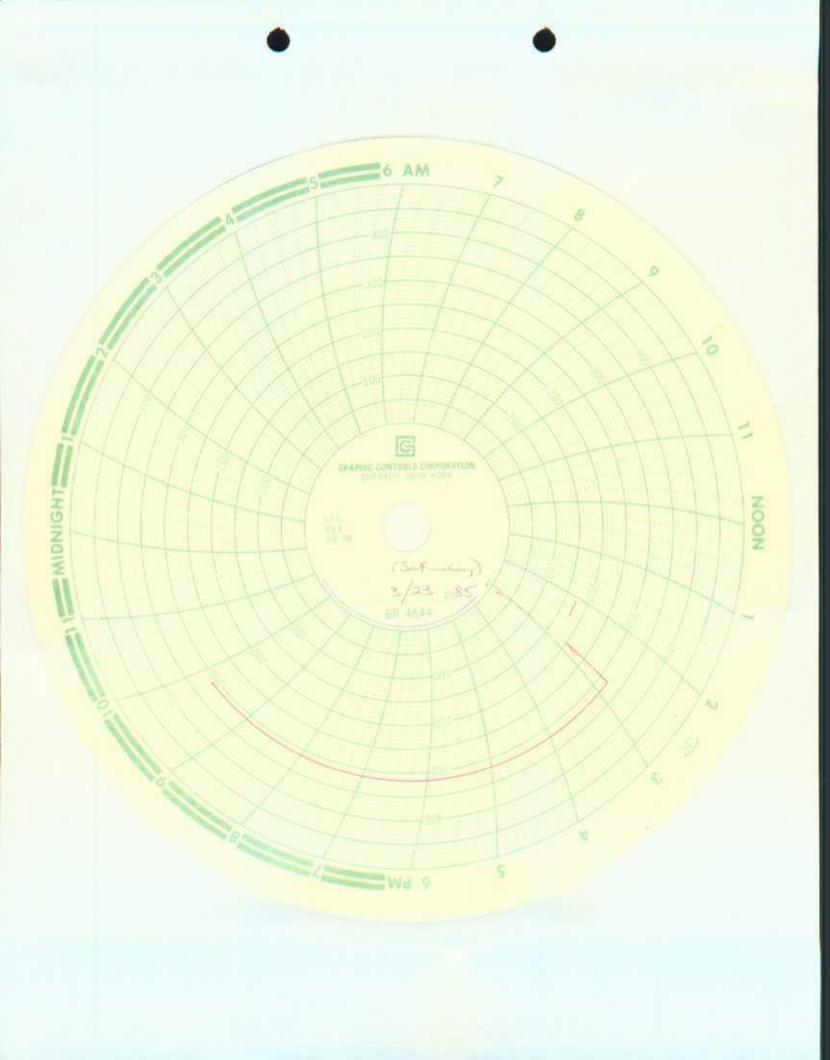
PGM:jba

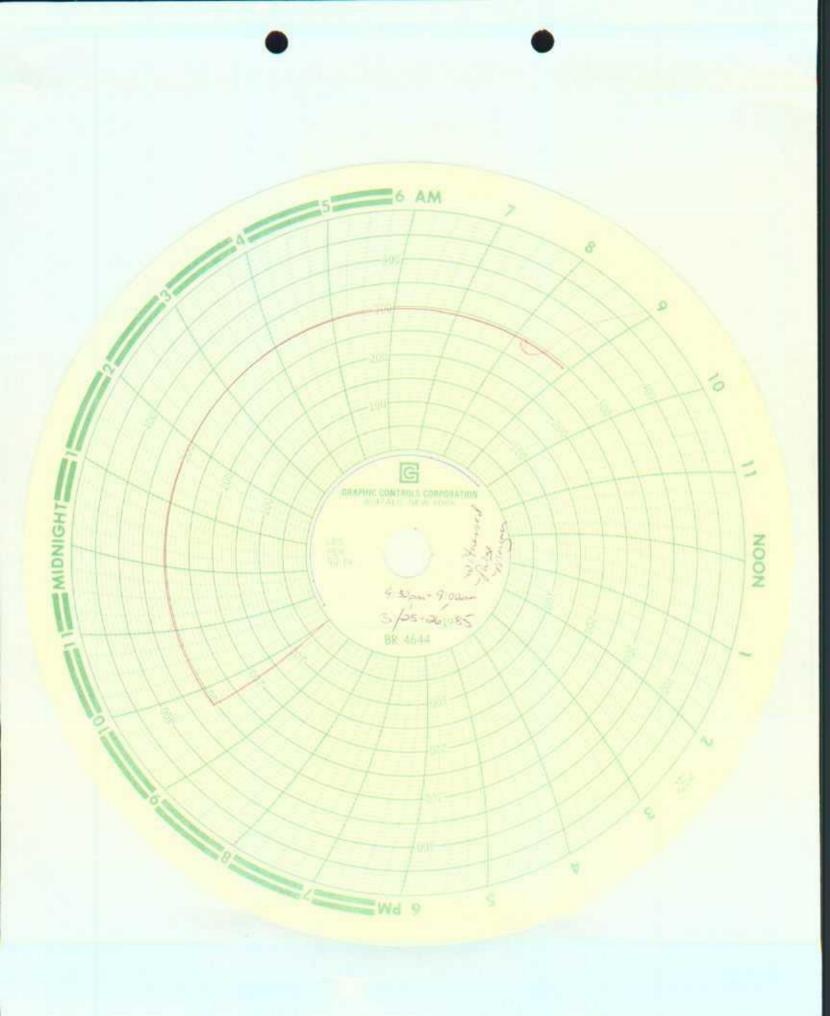
cc: John Guinn, EID District IV, Roswell

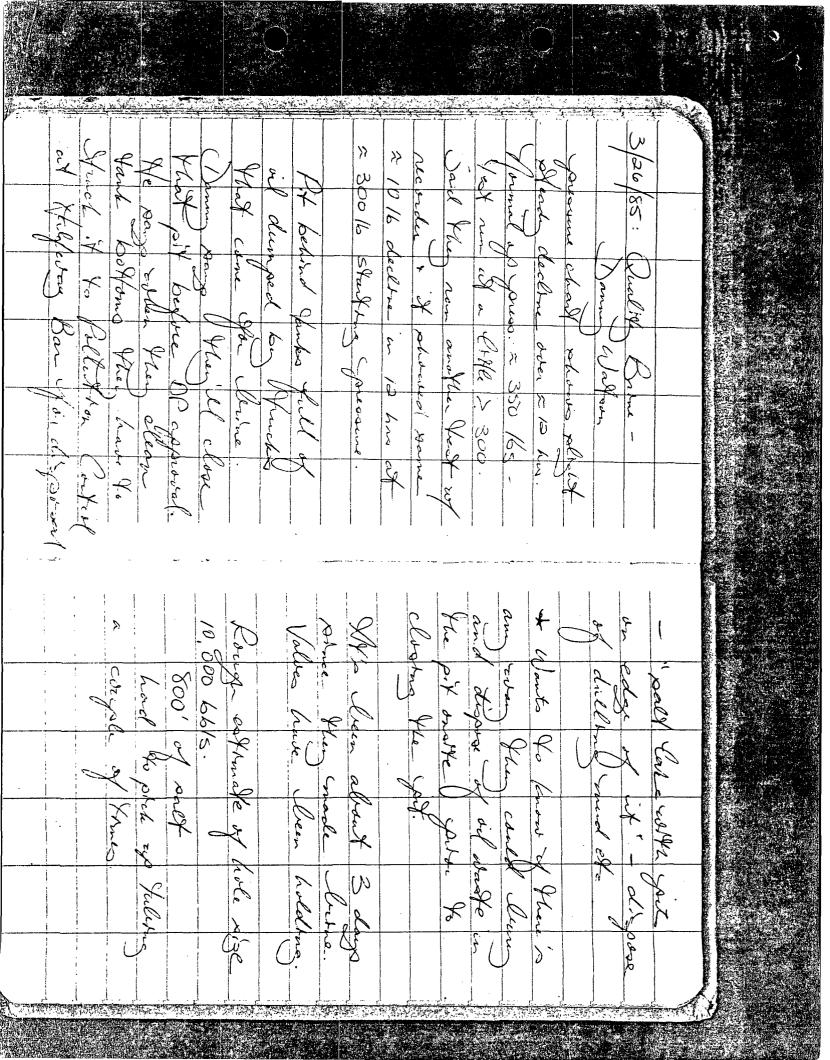
mson

PS Form 3800, Postmark or Date	න OTAL Postage and Fees	Date, and Address of Delivery	Return Receipt Showing to whom and Date Delivered	Restricted Delivery Fee	Special Delivery Fee	☆ Certified Fee	g Postage	P.O., Slavent ZIP Colla M	Streeting North 75	5 sont day Watter	(See Reverse)	NO INSURANCE COVERAGE PROVIC NOT FOR INTERNATIONAL MAIL	receipt for certified mail	52h 2T9 d	
<b></b>	\$						\$	7267				PROVIDED	d mail	976	

ul STATE OF NEW MEDICO MEMORANDUM OF MEETING OR CONVERSATION NVIRONMENT Time Date 3:00 p.m. Telephone. Personal Other Parties Originating Party Ivis Wa bon Morgan a Subject . Vest to inconclustve pressure Discussion that . the D Davd of Ron Amposes affidait Zooulo accept an rom tre toho at the. Aressene da a wel con Was the leng د  $\alpha$ 1 A an not leak owede the the alatsons would che an Ċ he replace daldes a de drop-o de requ C pressure -valdes; then and run The e me he cha nd Conclusions or Agreements drip paid she word Jaso de messaal he 200 - .---بوليا محمد يتجير وتحال 100 Distribution Signed a







Sample From source water well: pH: 6.89 T: 17"C Spea cond. 91×10 = 910 8503260937 +38 sample at brine: pH: 6.18 T. 15°C Cond: --adenset flat cond. is \$ 40 hour of burne \$0 measure at an meter \$503,260950 \$ 51 150 bb/s standard Fuckload - each truck addittan to dation ange bine hey allow pierine Variar As 150 psi chefore redenstand Alow to dissolve encrustand dan cin Valdag.



CERTIFIED MAIL \_ RETURN RECEIPT REQUESTED

January 18, 1985

Stan Watson Quality Brine Box 75 Tatum, NM 88267

RE: Response to Quality Brine's second submittal under the Assurance of Discontinuance.

Dear Mr. Watson:

Thank you for taking the time to dies your above-referenced submittal by phone with me on January 16, 1985. This letter will briefly repeat the points we agreed to during that conversation, with a couple of additional items that occurred to me on rereading your submittal and my July 18, 1984 letter to you.

- 1. You will prepare and submit a contingency plan for unanticipated leaks and spills from the surface facilities and injection well at Quality Brine.
- 2. On a quarterly basis, you will report to EID (a) the total water used for injection and (b) TDS from the two water wells closest to the brine well (Al Griffin and Buckeye Gas Products). Will you also commit to reporting chloride as well as TDS from these two monitor wells, and TDS and chloride from your source well, and brine sales for each quarter?
- 3. Your plugging and abandonment procedure will involve leaving the salt cavity full of brine, setting a plug at the base of the casing, and filling the casing from bottom to top with cement.
- 4. Due to an apparent error in the analysis submitted of your injection water, you will submit a second analysis from this source carried out by another laboratory. Also, please submit a complete analysis for which ever water well is closer to your brine well (Griffin or Buckeye); and an analysis of your brine, as described under III.C.6 of the outline provided to you to guide preparation of your discharge plan.

Stan Watson January 18, 1985 Page 2

5. EID will carry out an inspection of your facility including witnessing a pressure test such as we discussed by phone. I hope to make our trip to Quality Brine during the first week in February, and will notify you by phone when the trip is confirmed.

Again, thank you for your cooperation. I look forward to our visit to Quality Brine.

Sincerely,

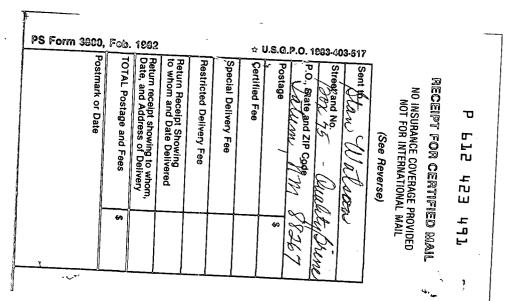
and Grand Worgan

Paige Grant Morgan Water Resource Specialist Ground Water Section

PGM:jba

cc: John Guinn, EID District IV, Roswell

msz



Quality: 398-3490 1/15/85: Called to discuss latest submittal and particularly the analysis of brine - confamiliated water Again, They were not in . (Spoke with the Watsons' pec's Doris Jonom) Call 8:00 a.m. Jomorrow - better chance of catching them first thing in the Opoke With Stan Watson: 1/16/85: (1) Explained what was meand by a "contingence plan" and fold him if needed to be included. He agreed to pend one in. (2) agreed to guarterly monttoine of TOS in two nearest wells and injection water. Dowe want chloride, Aoo? Could get a complete sube run when TDS shows a rise - / - Need to le sure de get reports of brine pales, too, either annual of quarterly Hen prefer. (3) Explained our pressure Jest proce-dure as it stands at present. He

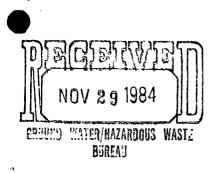
said that pounded great to him. I said we'd the to run one of Quality Brone the first week in February, and X'd Confact him later with details. He said he'd look into where he could get a pressure recorder etc. (4) Aiscussed requirement to fill casing af cement upon abandonment. He agleed to leave casty full of brine and fill casing from bottom to top with cement. (5) On analysis showing head No + Cl: if is from their source well, labelled "#6, Janny Watson" on the plat of adjacent water wells, g. & of "Depart of Quality Brine. They will pubmit a second analysis for this well. They suspect that it was in. concelly analyzed. The plat is oriented with "north" on right side of page and it is not a Section plat Need to note distance + derection from chine well to source well on Site VISIT.

-2 -

Ancidental remark: Their injection pressure may go as high as 340 psi.

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# REPORT II QUALITY BRINE

Box 75

Tatum, NM 88267

November 20, 1984

Page Grant EID Santa Fe, NM

Second submittal under Quality Brine Assurance of Discontinuances Dear Miss Grant,

The following report is in responce to your July 18 comments and etc.

- 1.(a) i. The surface casing is 24#, 8 5/8" **Cs**g, J55 grade. The 5 $\frac{1}{2}$ " csg. is N80 grade.
  - (a) ii. (diagram page 4 of the "Report of Qiality Brine") The translation on the tubing is 2 7/8" EUE 8 rd. threads N80 grade tubing. We ran 94 joints of pipe with two(2) 2'x 2 7/8" subs. And a Bull Plug with four(4) slots or openings at the bottom of the tubing.
  - (b) i. ii. Our emergency catch pit is lined with betonite that has been tilled into the soil. There hasn't been any fluid other than rain water in it since the construction of Quality Brine. There are no automatic controls on this facility. We hand check this equipment as many as five times during the production of Brine Water. (This is our insurance aginst any accidental leaks, and to make sure all oilers and other esential accessories are working properly.) Once we reach an adaquate amount of Brine in our storage tanks we check the facility each morning on the way to work and again on the way home. This eliminates the proglem of being "sold out" of Brine. And provides suppervision of about once every twelve hrs. We have provided water meters for every customer. The driver can count off every barrel until his truck is loaded. Should he ever over fill his trailer, the spill water wouldn't be in the catch pit for more than twelve hrs. We have our own trucks to haul any spills from the catch pit.
  - (b) iii. As per our "Report of Quality Brine" the ground water is protected by 8 5/8" surface pipe then approximatly 3" of cement from top to bottom of the N80 grade 5½" casing. Then inside the 5½" casing is approximatly 2½" of Fresh Water surrounding 2 7/8" N80 grade tubing. (All pipe & casing is installed new.)

- iv. In case of any contamination we will contact the EID within 48 hrs.
- I.A. The address below will best present our coraspondance in the matter of discharge plan.

Stan Watson Box 75 Tatum, NM 88267

II. A. l. Our emergency pit dimensions ar as follows: 45' x 45' x 6' deep.

> 2. The pipe between the Brine well and storage tanks is 3" SDR-17 grade polyethlene and 120 ft. in length and buried 48" below the surface.

3. The past three months our sales were 26,133 bb/s. total Brine Water.

- II B. 4. Our normal injection pressure is 300# at surface. When our pressure reaches 350# at surface, we reverse the flow for 20 minutes to Fresh Water the tubing.
- III. B. l. As for the formation above and below the salt section, they are impermeable at:

163' to 231' -68- Blue Clay, Sandstone
231' to 945' -714- Red Bed Shalls
945' to 2250' -1305- Red Bed & Shale
2250' to 2290' -40- Red Bed & Anhydrite
2290' to 2912' -622- Salt & Anhdrite
2912' Hard Anhdrite -T.D.\*Below 2912 Anhdrite, Gipsom, Dolomite, & Lime
down to 4600' to 468'

\*References from: Well Log on Sinclair Oil & Gas W.H. Anderson Well#1 Sec. 17 T. 12 R. 36 Approx. 1 mile North of Brine Well. P.A. 1957

III. B. 4. Buckeye Gas 27' from water to surface. Al Griffin 27' 6" from water to surface.

III. B. 5. Analasis included.

IV. A. l. Included.

IV. A. 2. Included.

IV. B. 2. Our closure plan for the surface equip. at the Brine facility would only be to dispose of the salt water at the commercial SWD. Then move said equipment to where ever needed. Level and reseed facility site.

Enclosed in the rest of the report vou will find our water analysis, A discription of the only well bore in the area. And domestic water well reports from the State Engineers office. Also water well logs from around the brine well.

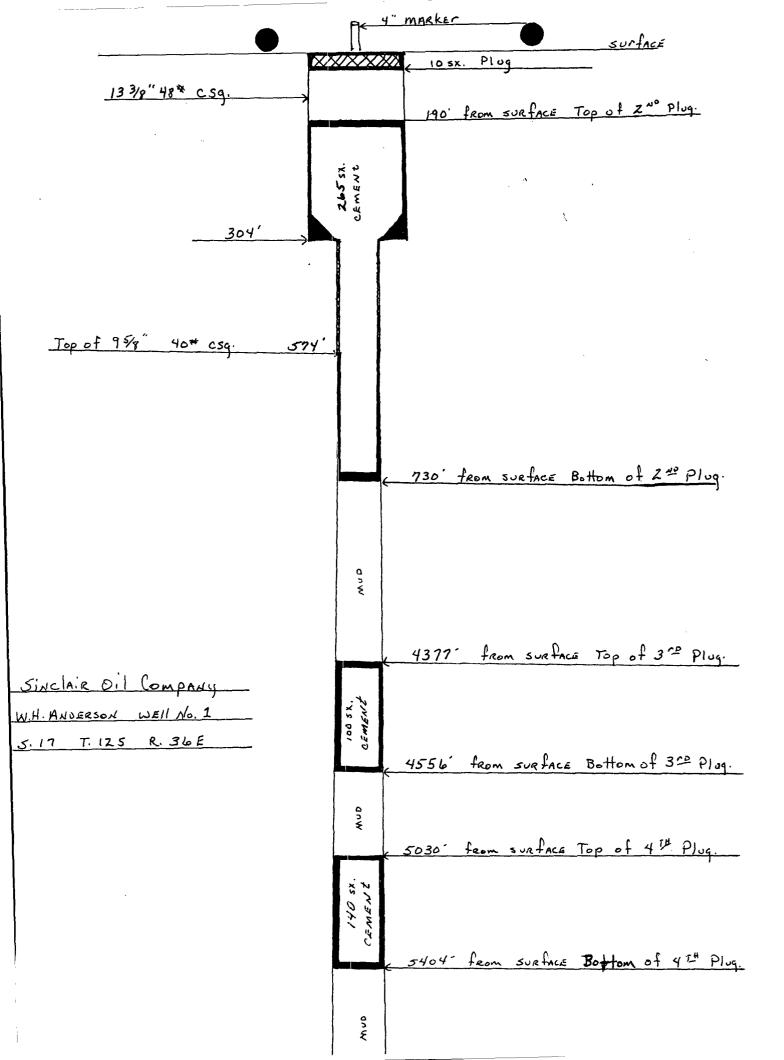
Thank you for your time and consideration.

Sincerely, Stan Wetar

Quality Brine Box 75 Tatum, NM 88267

BAAK OIL TRE A Baker Oil Thois Car	ER ATTING		WATER AN	NALYSIS REPORT
COMPANY		NON 39 1904		ANALYSIS NUMBER
	RINE STATION	WILZADDAILO WIA	مسير RTF	0626
BOX 75		J TETTER/HAZARDOUS WA BUREAU	101L	DATE 11/15/84
BOX 75	TATUM, N.M.	_	OUNTY OR PARISH	STATE
			*	
LEASE OR UNIT	WELL(S) NA	ME OR NO. W	ATER SOURCE (FORMATION)	
DEPTH, FT. ( BHT, OF	SAMPLE SOURCE	TEMP. OF W	ATER, BBL/DAY   OIL, BBL/DAY	GAS, MMCF/DAY
	FRESH			•
DATE SAMPLED	TYPE OF WATER	· · · ·		· · · · · · · · · · · · · · · · · · ·
11/15/84	PRODUCED	SUPPLY	WATERFLOOD SAL	T WATER DISPOSAL
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	(NUMBER BESIDI	VATER ANALYSIS P E ION SYMBOL INDIC 5 0	PATTERN ATES me/I* SCALE UNIT) 5 10 10 11 11 11 11 10 10 10 10	$\begin{array}{c c} 15 & 20 \text{ ci} - \underline{100} \\ \hline 1 & 1 & 1 \\ \hline 1 & 1 &$
DISSOLVED SOLIDS			DISSOLVED GASES	
CATIONS Total Hardness Calcium. Ca <sup>++</sup> Magnesium, Mg <sup>++</sup> Iron (Total) Fe <sup>+++</sup> Barium, Ba <sup>++</sup> Sodium, Na <sup>+</sup> (calc.)	me/l* 10 6 4 -0- 109	<u>mg/l</u> * 120 48.8 -0-  2507	Hydrogen Sulfide, H2S Carbon Dioxide, CO2 - Oxygen, O2 - PHYSICAL PROPERTIES - pH - Specific Gravity	$\frac{-0-}{3.9} mg/l^* mg/l^* \frac{-0-}{6.0} mg/l^* \frac{-7.80}{1.012}$
ANIONS Chloride, CI <sup></sup> Sulfate, SO4 <sup>=</sup> Carbonate, CO3 <sup>=</sup> Bicarbonate, HCO3 <sup></sup> Hydroxyl, OH <sup></sup> Sulfide, S <sup>=</sup>	$     \begin{array}{r}                                     $	<u>4000</u> <u>204</u> <u>-0-</u> 122 <u>-0-</u> <u></u>	_ Total Dissolved Solids (calc.) • Stability Index @_20_°C _ @°C _ CaSO4 Solubility @_20_°C _ @°C _ Max. CaSO4 Possible (calc.) _ Max. CaSO4 Possible (calc.)	7001.8 mg/l* -0.06 me/l* 36.0 me/l* me/l* 4.3 me/l*
	. <b>-</b>	· · · · · · · · · · · · · · · · · · ·	– Residual Hydrocarbons	ppm(Vol/Vol)
TOTAL SOLIDS (QUANTI		7001_8		<b>1 1 1 1</b>
	IENDATIONS: CORROSIVE TENDENC' SULFATE SCALING IS		used interch respectively	I and mg/I are commonly angeably for epm and ppm . Where epm and ppm are ctions should be made fo vity.
BAKER OIL TREATING REPR	ESENTATIVE ADDRESS	<u></u>	TELEPHON	E

J. LEWIS	ADDRESS		TELEPHONE OFF:	RES:
ANALYZED BY: RITA BETTY	11715/84	DISTRIBUTION		



			N	ew mexio	O OIL CONS	ERVATION COM	MISSION
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AR	EA 640 ACRES WELL CORRECT	 			2011101110		· · · · ·
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Sinclair	011 & Gas ( (Comp	ny or Operator)			(J	(Lease)	Unit
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			-				
0. 4, from			to			Icet	
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			MEDDAY		0077	
		····	MUDDING	3 AND CEMENTING RE	CORD	
BIZE OF	SIZE OF CASING	WHERE SET	NO. SACES OF CEMENT	METHOD USED	MUD GRAVITY	AMOUNT OF MUD USED
15"	13-3/8	304 *	350	Halliburton		
12-1/4	9-5/8	14981	1800	Halliburton		

### BECORD OF PRODUCTION AND STIMULATION

(Record the Process used, No. of Qts. of Gals. used, interval treated or shot.)

### DRY HOLE - PLUGGED AND ABANDONED

esult of Production Stimulation.

Tig & fccs OCC

cc: FHR, HFD, File

Depth Cleaned Out.

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			$\geq C_{PP}$				Form	C - 103	3
	10	· •	· · · ·	- On-			(Revise	ed 3-5	5)
NEW MEX	ICO OIL CONSE	ŔŴA T	TION CO	MMIS	SION	•	•		
	ELLANEOUS R								
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(Submit to appropria	te District Offic	e as r	ber Com	miss	on Ru	ile ll	106)		
· · · · ·		•							
COMPANY	· .				•				
COMPANY Sinclair Of	& Gas Company,		ist Broad	way,	lobbs,	Ney	- exico		
	(Add	dress)							
		**					<u>н</u> 1,		
LEASE W.H. Anderson	WELL NO,	1	UNIT (	) S	17	т	125	Rg	36E
DATE WORK PERFORME	D As Shown		POQL	W	Lidcat	<u> </u>			
This is a Density of VCh	1	1 1.		77 1	1		t of Cas		h +
This is a Report of: (Che	ck appropriate	поск)	Ĺ	Resul	ts oi	lest	t or Cas	sing 5	nut-
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Beginning Duilli	ng Operations			Reme	dial V	Nork	τ		
i joeginning Drinn							-		
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	0			Other	-		ng Aban	·	

Detailed account of work done, nature and quantity of materials used and results obtained. 2-10-57: Rigging up to drill cement plug and re-plug well.

2-11-57: Drilled cement out to 5500'. Re-plugging from 5500' to surface.

2-12-57: Set 140 macks cement plug from 5030' to 5404'.

2-13-57: Ran drill pipe open ended and spotted 100 sack cement plug from 4377 to 45561 and spotted 265 sack cement-plug from 190' to 730'. Set 4\* "Regulation Marker" 4! above surface level in 10 sack cement in top of 13 3/8\* OD casing.

FILL IN BELOW FOR REMEDIAL WORK REPORTS ONLY								
Original Well Data:								
DF flev. TD PBD	Prod. Int Compl Date							
Tbng. Dia Tbng Depth	Oil String Dia Oil String Depth							
Perf Interval (s)								
Open Hole Interval Producing Formation (s)								
RESULTS OF WORKOVER:	BEFORE 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	above is true and complete to the best of							
Name W.a. Gressert	my knowledge. Name							
Title	Position District Supt;							
Date APR 3 1957	Company Sinclair Oil & Gas Company							
Orig. & 2cc:OCC cc:FHR,HFD,File								

		 			Form Revis		
NEW MEXICO OIL CONSERVAT	TION CO	омм	ISSION				,
MISCELLANEOUS REPOR	TS ON	WEI	<u>Girs</u>				
(Submit to appropriate District Office as	•			ule ll	06)		
COMPANY_ Sinclair Oil & Gas Company, 520 Es	ast Broa	dwav.	Hobbs	New	Mexic	0	
(Address)				8			
LEASE W.H. Anderson Unit WELL NO. 1	UNIT_	0 8	5 17	Т	125	R	36 <u>e</u>
DATE WORK PERFORMED 10-30-56	POOL		Wilde	at			
This is a Report of: (Check appropriate block)		Res	ults of	Test	of Ca	sing	Shut-off
Beginning Drilling Operations		Rer	nedial	Work			
<b>I</b> Plugging		]Oth	er				

Detailed account of work done, nature and quantity of materials used and results obtained.

Total Depth - 13794'. Filled hole with heavy mud. Spotted 50 sacks cement plug from 12222 to 12350'. Set 25 sack cement plug from 4460 to 4525'. Cut 9 5/8" OD casing off at 574' and spotted 15 sack cement plug from 565 to 585 '. Set 15 sack cement plug from 295' to 315'. Set 15 sack cement plug in top of 13 3/8" OD casing and bottom of cellar with 4 "Regulation Marker" extending 4' above surface level. Completed 5:00 PM 10-29-56.

FILL IN BELOW	V FOR RE	MEDIAL WO	ORK REPORTS ONL	Y.					
Original Well Da	ata:								
DF Elev.	TD	PBD	Prod. Int.	nt. Compl Date					
Tbng. Dia	Tbng De	pth	Oil String Dia	Oil Stri	ng Depth				
Perf Interval (s	)								
Open Hole Inter	val	Pro	oducing Formation (	s)					
RESULTS OF W	ORKOVEF	t: ·		BEFORE	AFTER				
Date of Test									
Oil Production,	bbls. per	day							
Gas Production,	Mcf per	day							
Water Productio	on, bbls. p	per day							
Gas-Oil Ratio,	cu: ft. pei	r bbl.							
Gas Well Potent	ial, Mcf p	er day							
Witnessed by					······································				
	ş			(Company)					
OIL CONSE	RVATION	COMMISSIC	ON I hereby certi above is true		brmation given to the best of				
	1	,	my knowledge						
Name W.Q.		st-	Name	C-Anttie					
	Title Uli & Gas Inspector Position District Supt.								
Date		<u> </u>	Company Sinc	lair Oil & Gan	Company				
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			feet to				
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OIL WEL	L: The	productio	n during the first 24 hours was		ba	rrels of liqu	id of which
	was	oil;	% was emulsion;		.% wate	r; and	% was sediment. A.P.1.
	Grai	itv	······				
						•	
GAS WEL	L: The	productio	n during the first 24 hours was		м.С.Г. р	lus	barrels of
	liqui	d Hydroc:	arbon. Shut in Pressurelbs.				
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PLEA	SE IND	ICATE B	ELOW FORMATION TOPS (IN CON	FORMAN	CE WIT	H GEOGR	APHICAL SECTION OF STATE):
		1.1	Southeastern New Mexico				Northwestern New Mexico
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T. Salt	••••••	2285	T. Silurian			т.	Kirtland-Fruitland
	••••••••	2925 3030	T. Montoya				Farmington
T. Yates T. 7 Rive		3158					Pictured Cliffs
		3785	T. Ellenburger				Point Lookout
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T. San A		4390	T. Granite	~		Т.	Dakota
	ta	5011	Т			Т.	Morrison
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218	925	707	Red Beds				
925 2290	2290 3185	1365 895	Red Beds & Shells Salt & Anhydrite				
3185	3815	630	Salt, Anhydrite, & Gypsum				
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4357 11118	4448 4600	91 152	Anhydrite & Dolomite Lime and Anhydrite		[		
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<b>1</b> .					. <b></b> .	<b></b>		
			1 that the information given herewith is a vallable records.		· · ·		11/13/56	
Compan	y cr Operat	or Sinc	lair Oil & Gas Company	Address.	520 E. Bro	adway, Ho	bbs, New Mext	
Name	C	. G. C	onfer	Position	or Title Distr	ict Engine	er	······································

	* BETENBUUGH T 8 L UU89 0890 2/28	AYTON 0 0 1 2/2024	198 FULLERIUN PAUL E E 00198	001558 UTC JU 10/28/7	$\begin{array}{cccccccccccccccccccccccccccccccccccc$	L 001558	* * FOX A J L 00015 * * * FOX L D L 00015	2821AS L 02821		L 00952	282153 1/ 22/ 6	82152 L 02821 L 02824 82152 L 02821 L 028262 82152 J 02821 L 028262			00632 NEEVES JEAN A 5/19/4	473C L 00130 L 1/30/4	00155E		FILE FILE SOURCE PRIORITY S
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LEA COUNTY BASIN BASIC REFERENCE FILE FILE 1,01006 L\_01132 L\_01127 L\*01103 \* \* \* \* 01093 L 01050 L 01050 L 01055 ±01043 \* ¥ .01048 # \* 01003 01029 \* \* 01022 01012 \* ≑ \* <sup>0</sup>1001 ±01137 \* \* \* 0:004 01042 C 01023 5893 CASTER FERREL RASSETT A F ROGERS H FISHER T J ROBINSON WILLIE ROGERS H J TEXAS COAL & OIL PRICE H D WHISENANT L GUYE J D GUYE J D WILLIAMS LILLIE BETENBOUGH T B JANES NA PEVELER J W TUTT F H SUMMERS WYLMA A MORRISON CLYDE SON A E MAULDIN CECIL E NICKELL CECIL SHULTS J τ 5 2 SOURCE D Г ٣ r -rr PRIDRITY 03,50 1221 850 150 , 50 <u>7</u>50 221 , 50 150 50 50 150 ີຮັ ទី០ ច្ច 40 STATUS USE EISTENENES MEEL LOCATION 66 - "AJEATTON-SARABSOS 12S 12S 125 12S 12S 12S 12S 125 12S 12S 12S 125 125 12S 12S 12S 12S 12S 12S LOCATION 36E 36E 36E 36 E 36 E 36E 36 E 36E 36 E 36 E 36 E 36E 36E 36E 36E 36E 36E 36E 36 E 16 254 15, 21, ЗC 21, 28 28 255 255 25, 252 20 28 250 28 28 28 28 FILE 3.00 3.00 3.00 3.00 3.00 3.00 3.00 3.00 3.00 3-00 3-00 3.00 3.00 3.00 3-00 3.00 7/09/80 PAGE NG. RESERVATION ACRE-FEET DATH

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INSTRUCTIONS: This form should be typewritten, and filed in the office of the State Engineer, P. O. Box 1079, Santa Fe, New Mexico, or in the office of the Artesian Well Supervisor, Roswell, New Mexico. Section 5 should be answered only if an old artesian well has been plugged. All other sections should be answered in full in every case, regardless of whether the well drilled is shallow or artesian in character. This report must be cubscribed and sworn to before a Notary Public.

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FROM (Depth in Feet)	TO (Depth in Feet)	THICKNESS IN FEET	CLASSIFICATION OF FORMATION
surface	5	5	soil
5	10	5	white clay
10	12	2	dry gravel
10	32	20	hard caliche
	60	28	hard sand & water
32		20	hard Sand & Water
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I L. A. Summers \_\_\_\_\_\_ do solumnly swear that, to the best of my knowledge and it belief, the foregoing information is a true and correct record of the well for which report is hereby made, insofar as can be determined from all available records.

11 day A.D., 19\_51 June

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My Commission Expires.

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Position. 1 Jall m a Notary Public March 5, 1953 . ومب

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Box 58 Streel, and Number. Tatum, New Mexico Post Office. ÷ . .

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(This form to be executed in triplicate)

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Date of Receipt			;		Permit No.	<b>1-1</b> 504	· .
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Name of permittee	e,			Tetu	m N.M.		·
Street or P. O.	• • • • • • • • • • • • • • • • • • • •	Shallow	, City and Sta				
1. Well location and							
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casing above sea							fee
depth to water upo							19
and completed	7/29	, 19 52	; name of drilling	contractor	J.W.Hat	thews	
	; Addres	s, Tatu	n N.H.	; Drille	r's License N	WD-11	6
2. Principal Water be	aring Strata:					• • •	
Depth From	in Feet	Thickness		escription of W	ater-bearing F	ormation	
No. 1 48	55	7	Brown Qui	ck Sand	· · · ·		
No. 2							
No. 3		<u></u>	· · · · · · · · · · · · · · · · · · ·				
No. 4	-					:	
No. 5							
Diameter Pounds in inches per ft.		oth of Casing or I fop Bottor		Type of	Sboe 1	Perforație From	on To
in inches per ft.				Type of	Sboe 1		
in inches per ft.	per inch J			Type of	Sboe 1		
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Depth From	in Feet To	Thickness in feet	Description of Formation
0	2,	2	Surface Soil
2	40	38	Caliche
38	48	10	Sandy Caliche ( Water Show )
<u>48</u>	55	7	Brown Quick Sand ( Water )
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u er e na al Z Licensed Well Driller . ..... and when the start Instructions

This form shall be executed, preferably typewritten, in triplicate and filed with the State Engineer's Office at Roswell, New Mexico, within 10 days after drilling has been completed. Data on water-bearing strata and on all formations encountered should be as complete and accurate as possible. (fills form to be executed as (fills)

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# WELL RECORD

Depth . From	in foet	Thickness in feet	Description of Formation
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35-	52	9.8	water Sand
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The under	signed hereby	certifies that,	to the best of his knowledge and belief, the foregoing is a true and
t record of	the above desc	ribed well.	
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NOV 5 1952 OFFICE SOSWILL SUFERIES (This form to be executed in triplicate)

WELL RECORD

Permit No. 1 15-94 Date of Receipt. Petrolium Name of permittee, ..... Typas Street or P.O., HO 7 Wish Se City and State 1. Well location and description: The well lition Late vell is located in. SW 4 of Section 20 125 Elevation of top of Township Range 2 casing above sea level, inches; total depth, feet; diameter of hole, feat: 1 18.5 2 32 depth to water upon completion, ...feet; drilling was commenced 19.5.2 ...; name of drilling contractor. m and completed ... 306 Kash 33; Driller's License No AB /// Address, ... 2. Principal Water-bearing Strata: Depth in Fest From 1 To Thickness Description of Water-bearing Formation No. 1 33 9 Sa No. 2 No. 3 No. 4 No. 5 3. Casing Record: Diameter in inches Depth of Casing or Liner Top Bottom Feet of Casing Perforations Type of She *P* 62 non ... . .÷. 4. If above construction replaces old well to be abandoned, give location :... of Section. wnshir name and address of plugging contractor, rect record of the above described well.  $\langle \cdot \rangle_{\cdot, \cdot}$ date of plugging -- 19:--: describe how well was plugged: Instructions well, New Medico. an nighted. Lata on Its no brie sinth unitsod-tate NOV 5 1952 OFFICE LL SUPERVISOR ARTERIAN W NEW MEXICO J.P. 1.-1-911

(This form to be executed in triplicate)

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WELL RECORD

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The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

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This form shall be executed, preferably typewritten, in triplicate and filed with the State Engineer's Office at Roswell, New Mexico, within 10 days after drilling has been completed. Data on water-bearing strata and on all formations encountered should be as complete and accurate as possible.

Instructions

DEDISEC SCOURD WART TREEMISTS NEALCO W. .....

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#### WELL RECORD FIELD ENGR. LOG . File No.

INSTRUCTIONS: This form should be typewritten, and filed in the office of the State Engineer, (P.O. Box 1079) Santa Fe, New Mexico, unless the well is situated in the Roswell Artesian Basin, in which case it should be filed in the office of the Artesian Well Supervisor, Roswell, New Mexico, Section 5 should be answered only if an old artesian well has been plugged. All other sections should be answered in full in every case, regardless of whether the well drilled is shallow or artesian in character. This report must be subscribed and sworn to before a Notary Public.

Sec. 1					1.1141.0	·.		· .		•
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State whether w	ell is sl	allow or, ar	tesian	shall	₩.	· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·	
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No. 2, from		<sub>.</sub> to		Thickness	s in feet		, Formation	2   •••••	· · · · · · · · · · · · · · · · · · ·	
No. 3, from		to	· · · · · <b>,</b>	Thickness	in feet		Formation			
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FROM (depth in feet)	TO (depth in feet)	THICKNESS IN FEET	CLASSIFICATION OF FORMATION
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10	35	25	calliche à reck
35	60	25	water sands
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SUBSCRIBED AND SWORN TO BEFORE ME this ...... Signed

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Notary Public (5): Street and Number

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	(B) Drilling Co	ontractor	B & A W	later We	ll Ser	vice		License No	ID 764	
			Tatum,				11.1	•	·	
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Dep.	Feet	Thickness	Section 6. LOIG OF HEE
From	То	in Feet	Color and Type of Material Encountered
- 0-	3	3	top soil dark
3	18	15	caliche white
18	36	18	caliche with sand - $W / B$ white
36	41	5	caliche
41	53	13	white sand w light clay, w/b redish tan
53	56	3	quartzite hard white
56	63	7	yellow clay
63	80	17	yellow clay w/ small gravel
80	105 -	25	Gray clay
105	110	<u> </u>	ellow clay
110	111 ·	1	sandstone hard
111	- 115	4	blue clay
115	· 116	1	sandstone hard
116	119	<u>3</u>	blue clay
119	120	1	sandstone hard
120	128	8	blue clay
128	162	34	layered hard & soft sandstone & grey & tank
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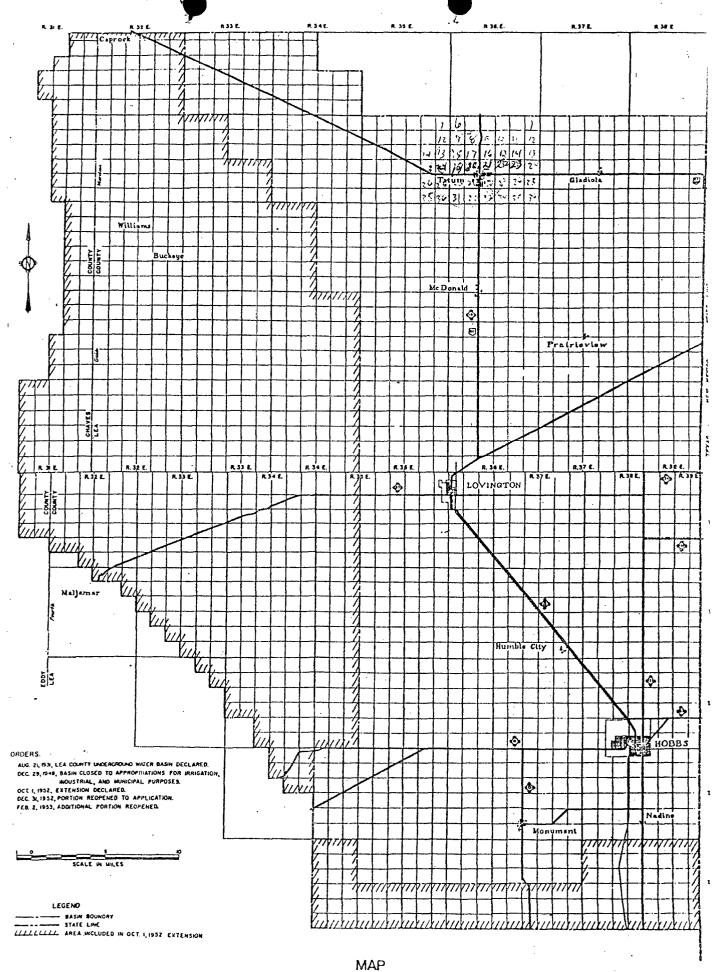
Section 7. REMARKS AND ADDITIONAL INFORMATION

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The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Jeln Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district office of the State Engineer. A ions, except Section 5, shall be answered as completely and accurat possible when any well is drilled, repaired or deepene. When this form is used as a plugging record, only Section 1(a) and Section . need be completed.



SHOWING DECLARED AREA LEA COUNTY UNDERGROUND WATER BASIN



# STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020 STEVEN ASHER, Director TONEY ANAYA GOVERNOR

Joseph Goldberg

Ted Guambana DEPUTY SECRETARY

JOSEPH F. JOHNSON DEPUTY SECRETARY

July 18, 1984

Danny Watson Quality Brine P.O. Box 5967 Hobbs, NM 88241

RE: First Submittal Under Quality Brine's Assurance of Discontinuance

Dear Mr. Watson:

As we agreed by telephone on June 4, 1984, some of the materials in the Quality Brine file in the EID Ground Water Section as of June 15, 1984, have been accepted as the submittal due on that date under your Assurance of Discontinuance. Those materials are as follows:

- 1. Letter from Stan Watson to Joe Ramey of June 9, 1983, with the following inclusions:
  - (a) Consent forms from five neighbors permitting use of their water wells for monitoring; a map showing location of these wells with respect to Quality Brine (a sixth water well owned by one of the partners in Quality Brine is also indicated); and a record of specific conductance in each well.
  - (b) Three photographs of the facility and explanatory captions.
  - (c) State Engineer's well record form for Quality Brine water well (includes driller's log).
- 2. Letter from Danny Watson to "Whom it may concern" (amended in handwriting, "To David G. Boyer, EID"), January 5, 1984, with the following attachments:
  - (a) Proposed drilling and construction procedure for brine facility dated January 10, 1983, signed by Phil Withrow, President, B & E, Inc.
  - (b) Copy of legal notice regarding change of place and purpose of use of Danny Watson's water right, to be used to supply brine facility.
  - (c) OCD permit to drill brine well dated February 28, 1983.
  - (d) OCD revised permit to drill brine well dated June 6, 1983.
  - (e) OCD well location and acreage dedication plat form dated February 24, 1983.
  - (f) OCD report form that the brine well had been drilled (no date).

Danny Watson July 18, 1984 Page 2

(g) Plugging bond.

3. Paper entitled "Report of Quality Brine, Tatum, N.M." submitted to David G. Boyer and A. Paige Grant, Ground Water Section, EID, at a meeting with Quality Brine partners, January 6, 1984.

My comments on the above materials follow:

- The materials due June 15th are the plans and specifications of the brine well and "a proposal outlining measures to be taken to correct any possible violations of the Water Quality Control Commission Regulations resulting from surface activities." These elements of a discharge plan are listed under Sections II.B.1., IV.A.7. through 11., and IV.B.2. in the attached outline.
  - (a) On the well specs:
    - i. Is the surface casing of the J or N grade?
    - ii. In your notes on the tubing (diagram page 4 of the "Report of Quality Brine"), please translate the following: "7bg. 4 Jts. + 2 sub & B.P. w/4 slot."

Apart from these remarks, your submittal of well specs appears to be adequate.

- (b) On the proposal to correct any possible violation of the regulations from surface activities:
  - i. On your "emergency catch pit:" Is there any lining in this pit (caliche, bentonite, plastic, or other)? If unlined, how do you propose to prevent leakage from the pit into local ground water? (Pumping out the pit may be sufficient.) How often is it used (e.g., on a weekly basis, once every three months)? Is oil ever spilled in the pit?
- ii. How will spillage/leakage be prevented during truck loading or at transfer points within the facility?
- iii. Please submit contingency plans in the event of:
  - a. A leak/spill from surface facilities;
  - b. Loss of mechanical integrity of the injection well. How will ground water be protected from contamination or treated if contamination has occurred?
- iv. If there is a leak, spill or other unanticipated discharge of a significant amount of water contaminants on the surface or underground at your facility, will you commit to notifying the EID Ground Water Section within 48 hours?
- 2. The rest of the materials in your file pertain to requirements of later submittals under the terms of your Assurance. In my comments in the rest of these materials, I will follow the form of the enclosed outline.

Danny Watson July 18, 1984 Page 3

I.A. Please name <u>one</u> of the partners of Quality Brine and the best address to reach him. If one of you is designated president, chairman or otherwise lead officer, that is the person who should be designated the "responsible party" for the purposes of the discharge plan.

II.A.1. What are the dimensions of your emergency pit?

2. Please give the length and type of pipe carrying brine, from the well to the tanks. Are they buried or on the surface? If on the surface, how are they protected from being run over by trucks?

3. Please report your three-month totals of fresh water injected into the well and brine extracted or brine sold (brine extracted is preferable), on a quarterly basis.

II.B.4. At what pressure do you reverse the flow to blow down the well? What is your normal injection pressure?

III.A. Please submit soils information if your emergency pit is unlined.

III.B.1. Although the materials you have submitted cover your water well fairly thoroughly, more information is required for the brine well: in particular, permeability of the strata immediately above and below the salt beds, lithology and stratigraphy of the strata you drilled through down to the salt beds, and fracture pressure of the Salado.

- lackting

III.B.2., III.C.1. and 2. You may wish to consult with a geologist to prepare this portion of your discharge plan. — lackting- comming with next submittal?

III.B.4. Please provide the approximate total depth, depth to water, and surface elevation of wells no. 4 and no. 5 (ref. your plat of the wells you are using as monitoring wells, page 2 of your report). It would be very helpful also to have the driller's log for each well, obtainable from the State Engineer. On the basis of this information, I will request that you perform the water quality analysis specified in Section III.B.4. of the outline, for one of the wells.

III.B.5. Please have the specified analysis performed for your injection water. After this first submittal, you need only submit quarterly reports of total dissolved solids (TDS) and chloride from this well, unless these parameters indicate a change in water chemistry.

III.B.6. Please submit the analysis specified in this section of the outline. As above, once the major analysis is done, quarterly reports need only be for TDS and chloride.

IV.A.1. and 2. Please demonstrate that you have carried out the required search and will limit injection pressure if necessary, as specified in IV.A.2.

IV.A.3. Pressure testing will be required as part of the EID underground injection well inspection procedure, which is currently being developed.

Danny Watson July 18, 1984 Page 4

IV.A.7. If the emergency pit is unlined and is used to hold brine or other water pollutants for more than 24 hours, some type of monitoring system for the pit will be required. To avoid this requirement, please specify that fluids which go to the emergency pit will be pumped out within 24 hours.

IV.A.8. Covered under III.B.4.

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IV.A.10. Contingency plans are required as specified; and please add the notification commitment under IV.A.11.

IV.B.1.a. We recommend filling the cavity with saturated brine, installing a plug at the top of the salt as you have indicated and then running tubing to just above the plug and circulating cement from the bottom to the top of the well.

IV.B.1.b. Your plugging bond will be accepted for the period of this discharge plan approval. We may require that the amount of your bond be increased if you come in for renewal of your discharge plan at the end of five years.

IV.B.2. Please propose a closure plan for your surface facilities.

I hope that these remarks help to clarify what information is required to complete your discharge plan. Please let me know if I can explain these points further. I look forward to receiving your second submittal on or before November 30, 1984, as specified in your Assurance of Discontinuance.

Sincerely,

Paige Grant Water Resource Specialist Ground Water Section

PG:egr

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STATE OF NEW HEOCO MORANDUM OF MEETING OR CONVENTION ENTRONYENT . Time Date Telephone Personal 2:30 614 84 Originating Party Other Parties Jakon 9 anin Subject submittal specified by assurance Discussion under the impressi that her were " Report of: (Juali en Liff. Oer ) a whitch NN. the un m. 84 Dor Derson -a (1 6 ave  $\sim$ :00 the requ 0 paid is In began Arma 20 adas a paper Shaf in ed. might well Yo m r Julkil Lin hi reg es amplance an Conclusions or Agreemen Em Yo 10 redier. Keros Qu hew) a -ow we ad needed Kacke or ha Low Dad L h wou Ì lre Distribution Signed S . le



### STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020 STEVEN ASHER, Director

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 11, 1984

Quality Brine P.O. Box 5967 Hobbs, NM 88241

Dear Sirs:

Enclosed please find your copy of your Assurance of Discontinuance. We look forward to receiving the first submittal specified in your Schedule of Compliance, in June.

Thank you for your cooperation.

Sincerely,

Paige Grant Water Resource Specialist Ground Water Section

PG:egr

Enclosure

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### TONEY ANAYA GOVERNOR

Joseph Goldberg SECRETARY

Ted Guambana

DEPUTY SECRETARY

JOSEPH F. JOHNSON DEPUTY SECRETARY

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NO INSURANCE COVERAGE P NOT FOR INTERNATIONA	rovided L Mail	<u> </u>
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SECTION FOR CEDTIC

PS Form 3800, Feb. 1982

### ASSURANCE OF DISCONTINUANCE

WHEREAS, on December 8, 1983, the Director of the New Mexico Environmental Improvement Division ("EID") requested Quality Brine ("QB") to submit a Discharge Plan pursuant to \$\$3-104 and 5-101.B.3 of the New Mexico Water Quality Control Commission ("Commission") regulation for its discharges from its brine facility and brine well located in Section 21, Township 12 South, Range 36 East, N.M.P.M., Lea County, New Mexico; and

WHEREAS, neither the regulations nor an extension to discharge without an approved Discharge Plan issued by the Director, nor any Court Order, allows QB to operate an injection well and associated surface facilities without an approved Discharge Plan, and

WHEREAS, recent water quality analysis of nearby and adjacent wells did not indicate any present contamination of drinking water sources due to operations at the site; and

WHEREAS, QB has committed to the Commission to proceed with all diligence to prepare and secure an approved Discharge Plan; and

WHEREAS, the Commission and QB deem it appropriate to enter into this Assurance of Discontinuance.

QB assures the Commission as follows:

1. <u>ASSURANCE</u>: All unapproved discharges at the QB Brine Facility shall be discontinued as set forth in Paragraph 2 of the Assurance of Discontinuance.

2. <u>SCHEDULE OF COMPLIANCE</u>: It is agreed that the Discharge Plan shall comply with the following schedule:

QB shall submit plans A. and specifications of the in situ extraction well to the EID

B. QB shall submit a proposal outlining measures to be taken to correct any possible violation of the Water Quality Control Commission Regulations resulting from surface activities

с. EID shall complete review of QB materials submitted by June 15, 1984, and EID shall provide comments to QB

D. QB shall submit the information listed in §5-102.B.1d and the information listed in §5-203.A of the Water Quality Control Commission Regulations to the EID

E. EID shall complete review of QB materials submitted under Paragraph 2.D herein and EID shall provide comments to QB

F. QB shall submit a complete Discharge Plan which shall address all applicable requirements of the Water Quality Control Commission Regulations, Parts 3 and 5 on or before March 29, 1985.

EID shall complete re-G. view of Discharge Plan Application and EID shall provide comments to QB

QB shall submit re-Η. sponses to the EID comments

on or before August 1, 1985.

on or before June 3, 1985.

I. EID Director's approval or disapproval of Discharge Plan Application shall be promulgated on or before October 1, 1985.

If a public hearing is scheduled by the EID Director pursuant to §3-108 of the Commission's Regulations, all deadlines in Paragraphs 2.G through 2.I shall be 45 days later.

on or before June 15, 1984.

on or before June 15, 1984.

on or before August 15, 1984.

on or before November 30, 1984.

on or before January 30, 1985.

-2-

3. <u>MUTUAL COOPERATION</u>: QB and the EID shall mutually cooperate in accomplishing on a timely basis the matters contemplated by this Assurance. In this respect, direct communication among QB representatives and EID personnel is encouraged.

4. <u>MEETINGS</u>: It is understood that QB and the EID shall meet on at least two occasions to discuss the progress during the initial 240 days of the Compliance Schedule. The first meeting shall take place on approximately the 90th day, and the second meeting on approximately the 150th day, as the parties may mutually and reasonably agree. EID shall endeavor to communicate any concerns which might necessitate additional information so as to allow QB sufficient time to respond.

5. EXTENSIONS FOR GOOD CAUSE: It is expressly agreed and understood by the parties hereto that events not reasonably foreseeable on the date of execution of this Assurance may occur which will make it impossible or extremely difficult for QB to comply in a timely fashion with those compliance dates set out in numbered Paragraph 2. In the event such unforeseen events do - sk D.W. Director occur, QB may apply to the Commission for an extension for an additional reasonable period of time to comply with such tasks in numbered Paragraph 2. The additional reasonable period of time, if granted, shall in all cases be governed by the relevant circumstances.

6. <u>ENFORCEMENT</u>: The Commission shall not undertake enforcement against QB for the continuation of current discharges occurring during the pendency of this Assurance without first

-3-

giving QE 15 days prior written notice by the Director that QB is in violation of the terms of this Assurance. This Paragraph shall not preclude appropriate action by the Director or the Commission under §74-6-11 N.M.S.A. 1978.

Failure by QB to comply with any condition of this Assurance of Discontinuance shall be actionable as a violation of the Water Quality Act and of this Assurance under §§74-6-5 and -10 pt N.M.S.A. 1978, as applicable.

Nothing in this Assurance of Discontinuance shall relieve QB from the responsibility for complying with all the provisions of the Water Quality Act, the regulations promulgated thereunder or any other provision of law except as otherwise specifically provided herein.

7. <u>NO ADMISSION</u>: The terms, execution and any conduct in accordance herewith shall not constitute an admission of any kind by QB relating to matters under the Water Quality Act, Commission regulations, or any other matters relating to health or environment.

-4-

Signed and acknowledged this 10 day of APRIL, 1984.

STATE OF NEW MEXICO COUNTY OF Juite k

The foregoing instrument was acknowledged before me this  $10^{-10}$  day of  $10^{-10}$ ,  $19^{-10}$ , by Danny Watson, d/b/a Quality Brine.

SS

My Commission Expires:

Public Notary

APPROVED:

WATER QUALITY CONTROL COMMISSION

By

Water Quality Control Commission

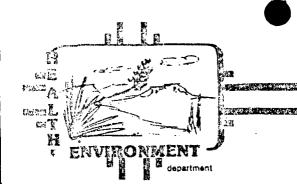
STATE OF NEW MEXICO ) SS COUNTY OE instrument was acknowledged , before me this The foregoing Richard Holland Bul 1984, by Steven Asher, Chairman of the day of

Water Quality Control Commission, on behalf of the Water Quality

Control Commission.

My Commission/Expires:

Public Notary



## STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020 STEVEN ASHER, Director

### TONEY ANAYA GOVERNOR

Joseph Goldberg SECRETARY

Ted Guambana DEPUTY SECRETARY

JOSEPH F. JOHNSON DEPUTY SECRETARY

March 30, 1984

Mr. R.W. Gallini Heidel, Samberson, Gallini, Williams and Harrington P.O. Drawer 1599 Lovington, NM 88260

Dear Mr. Gallini:

The enclosed copy of a memo is by way of informing you that your client, Quality Brine's Assurance of Discontinuance has been submitted to the Water Quality Control Commission for consideration at their meeting on April 10th.

Sincerely,

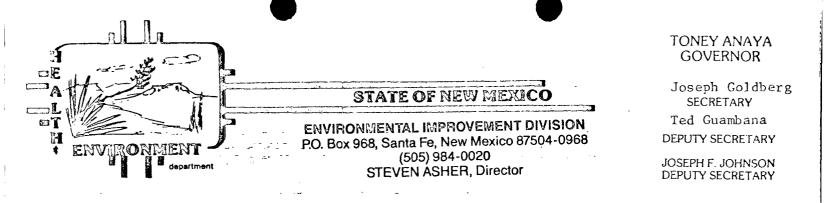
Paige Grant Hydrologist Ground Water Section

PG:egr

Enclosure

cc: Quality Brine

m592



### MEMORANDUM

TO: Water Quality Control Commissioners

FROM: Paige Grant, Water Resource Specialist, EID Ground Water Section APL

SUBJ: Assurances of Discontinuance from three brine well owner/operators

DATE: March 27, 1984

Attached hereto are three proposed Assurances of Discontinuance relating to brine in situ extraction facilities. Please note that they are based on the same format (form enclosed) and are very similar to each other, with the ... principal differences being in names, locations, and dates in the schedule of compliance. The Quality Brine Assurance is to be reviewed as it stands. The Assurance of C.W. Trainer and of Ernie Hegwer are changed from the attached drafts, as noted below:

C.W. Trainer Assurance of Discontinuance: the third "Whereas" is changed to read as follows:

WHEREAS, recent pressure tests of the brine well indicate good casing integrity, and all brine at the facility is discharged into lined pits, such that no contamination of drinking water sources is believed to have occurred due to operations at the C.W. Trainer facility; (and...)

Ernie Hegwer Assurance of Discontinuance: the third "Whereas" is changed to read as follows:

WHEREAS, there are no nearby and adjacent water wells to supply the brine well, so that Mr. Hegwer is having to pipe city water in from Carlsbad, New Mexico; and pressure tests have been made to indicate good casing integrity in the well, such that no contamination of drinking water sources is believed to be occurring as a result of Mr. Hegwer's operation; (and...)

In addition, Mr. Hegwer plans to amend the language of numbered paragraph 5, the "Good Cause" clause, to the language in the enclosed "Assurance" form. Both Mr. Trainer and Mr. Hegwer will have final drafts of their Assurances is of Discontinuance incorporating these changes when they appear before the Commission on April 10th.

### PG:egr

Enclosures

LAW OFFICES

C. GENE SAMBERSON R. W. GALLINI JERRY L. WILLIAMS DAVID L. HARRINGTON HEIDEL, SAMBERSON, GALLINI, WILLIAMS & HARRINGTON 311 NORTH FIRST STREET POST OFFICE DRAWER 1599 LOVINGTON, NEW MEXICO 88260 (505) 396-5303

F. L. HEIDEL OF COUNSEL

March 15, 1984

### RECEIVED

Ms. Paige Grant Hydrologist Ground Water Section Environmental Improvement Division P.O. Box 968 Santa Fe, New Mexico 87504-0968 MAR 1 9 1984

GROUND WATER/HAZARDOUS WASTE BUREAU

Re: Assurance of Discontinuance of Quality Brine

Dear Ms. Grant:

We acknowledge receipt of your letter dated March 12, 1984, in connection with the above referenced matter.

Enclosed herewith please find an original and one copy of the Assurance of Discontinuance of Quality Brine for your review and for submission to the Water Quality Control Commission for their approval. The typographical and oversight errors were corrected, and we incorporated the new Paragraph 5 "Extensions for Good Cause", which you recommended that we include in the corrected Assurance of Discontinuance.

Please let us know if there is anything further that needs to be done by us in connection with the Assurance of Discontinuance of Quality Brine. Otherwise, we will see you on April 10, 1984, at the meeting of the Water Quality Control Commission in Santa Fe.

With best regards, I am

Very truly yours,

HEIDEL, SAMBERSON, GALLINI & WILLIAMS

R. W. Gallini

RWG:ds

Enclosure

### ASSURANCE OF DISCONTINUANCE

WHEREAS, on December 8, 1983, the Director of the New Mexico Environmental Improvement Division ("EID") requested Quality Brine ("QB") to submit a Discharge Plan pursuant to \$\$3-104 and 5-101.B.3 of the New Mexico Water Quality Control Commission ("Commission") regulation for its discharges from its brine facility and brine well located in Section 21, Township 12 South, Range 36 East, N.M.P.M., Lea County, New Mexico; and

WHEREAS, neither the regulations nor an extension to discharge without an approved Discharge Plan issued by the Director, nor any Court Order, allows QB to operate an injection well and associated surface facilities without an approved Discharge Plan, and

WHEREAS, recent water quality analysis of nearby and adjacent wells did not indicate any present contamination of drinking water sources due to operations at the site; and

WHEREAS, QB has committed to the Commission to proceed with all diligence to prepare and secure an approved Discharge Plan; and

WHEREAS, the Commission and QB deem it appropriate to enter into this Assurance of Discontinuance.

QB assures the Commission as follows:

1. <u>ASSURANCE</u>: All unapproved discharges at the QB Brine Facility shall be discontinued as set forth in Paragraph 2 of the Assurance of Discontinuance.

2. <u>SCHEDULE OF COMPLIANCE</u>: It is agreed that the Discharge Plan shall comply with the following schedule:

A. QB shall submit plans and specifications of the in situ extraction well to the EID on or before June 15, 1984. B. OB shall submit a proposal outlining measures to be taken to correct any possible violation of the Water Quality Control Commission Regulations resulting from surface activities on or before June 15, 1984. C. EID shall complete review of QB materials submitted by June 15, 1984, and EID shall provide comments to QB on or before August 15, 1984. D. OB shall submit the information listed in §5-102.B.1d and the information listed in §5-203.A of the Water Quality Control Commission Regulations to the EID on or before November 30, 1984. E. EID shall complete review of QB materials submitted under Paragraph 2.D herein and EID shall provide comments to QB on or before January 30, 1985. F. QB shall submit a complete Discharge Plan which shall address all applicable requirements of the Water Quality Control Commission Regulations, Parts 3 and 5 on or before March 29, 1985. EID shall complete re-G. view of Discharge Plan Application and EID shall provide comments to QB on or before June 3, 1985. Η. QB shall submit responses to the EID comments on or before August 1, 1985. I. EID Director's approval or disapproval of Discharge Plan Application shall be promulgated on or before October 1, 1985. If a public hearing is scheduled by the EID Director pursuant to §3-108 of the Commission's Regulations, all deadlines in Paragraphs 2.G through 2.I shall be 45 days later.

-2-

3. <u>MUTUAL COOPERATION</u>: QB and the EID shall mutually cooperate in accomplishing on a timely basis the matters contemplated by this Assurance. In this respect, direct communication among QB representatives and EID personnel is encouraged.

4. <u>MEETINGS</u>: It is understood that QB and the EID shall meet on at least two occasions to discuss the progress during the initial 240 days of the Compliance Schedule. The first meeting shall take place on approximately the 90th day, and the second meeting on approximately the 150th day, as the parties may mutually and reasonably agree. EID shall endeavor to communicate any concerns which might necessitate additional information so as to allow QB sufficient time to respond.

5. EXTENSIONS FOR GOOD CAUSE: It is expressly agreed and understood by the parties hereto that events not reasonably foreseeable on the date of execution of this Assurance may occur which will make it impossible or extremely difficult for QB to comply in a timely fashion with those compliance dates set out in numbered Paragraph 2. In the event such unforeseen events do occur, QB may apply to the Commission for an extension for an additional reasonable period of time to comply with such tasks in numbered Paragraph 2. The additional reasonable period of time, if in all granted, shall cases be governed the by relevant circumstances.

6. <u>ENFORCEMENT</u>: The Commission shall not undertake enforcement against QB for the continuation of current discharges occurring during the pendency of this Assurance without first

-3-

giving QB 15 days prior written notice by the Director that QB is in violation of the terms of this Assurance. This Paragraph shall not preclude appropriate action by the Director or the Commission under §74-6-11 N.M.S.A. 1978.

Failure by QB to comply with any condition of this Assurance of Discontinuance shall be actionable as a violation of the Water Quality Act and of this Assurance under §§74-6-5 and 10 N.M.S.A. 1978, as applicable.

Nothing in this Assurance of Discontinuance shall relieve QB from the responsibility for complying with all the provisions of the Water Quality Act, the regulations promulgated thereunder or any other provision of law except as otherwise specifically provided herein.

7. <u>NO ADMISSION</u>: The terms, execution and any conduct in accordance herewith shall not constitute an admission of any kind by QB relating to matters under the Water Quality Act, Commission regulations, or any other matters relating to health or environment.

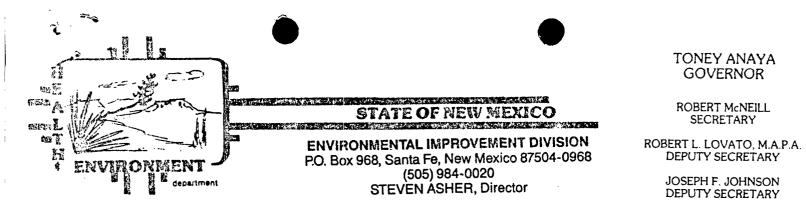
Signed and acknowledged this \_\_\_\_\_ day of \_\_\_\_\_, 1984.

Danny Watson d/b/a Quality Brine

STATE OF NEW MEXICO ) : SS COUNTY OF The foregoing instrument was acknowledged before me this day of \_\_\_\_\_, 19\_\_\_, by Danny Watson, d/b/a Quality Brine. My Commission Expires: Notary Public **APPROVED:** WATER QUALITY CONTROL COMMISSION By Steven Asher, Chairman Water Quality Control Commission STATE OF NEW MEXICO ) : SS COUNTY OF The foregoing instrument was acknowledged before me this day of \_\_\_\_\_, 19 \_, by Steven Asher, Chairman of the Water Quality Control Commission, on behalf of the Water Quality Control Commission. My Commission Expires:

\_ '¥

Notary Public



March 12, 1984

Mr. R.W. Gallini, Attorney Heidel, Samberson, Gallini, Williams and Harrington P.O. Drawer 1599 Lovington, NM 88260

**KE:** Assurance of Discontinuance of Quality Brine

Dear Mr. Gallini:

As I relayed to you by telephone, the March 13th meeting of the Water Quality Control Commission (WQCC) has been cancelled, due to the likelihood that the Commissioners will have to attend to situations arising from the special session of the legislature. The proposed agenda for the March 13th meeting of the WQCC will be moved to the meeting on April 10th, instead. I sincerely hope this change in schedule does not inconvenience you or your client.

At the April 10th meeting, the Commission will be considering the enclosed standard form for an Assurance of Discontinuance. Please note numbered paragraph 5, "Extensions for Good Cause." You will recall that, at the January 10th meeting, one of the Commissioners expressed concern about the "good cause" clause used in the Assurance of Discontinuance of KTS. We have reviewed the new "good cause" language with that Commissioner, and we expect the full Commission's agreement with the change at their next meeting. We recommend that you incorporate the new "good clause" language into the Quality Brine Assurance of Discontinuance.

I would also like to direct your attention to several typographical and oversight errors in the Quality Brine Assurance, which are likely to be noticed by one or more Commissioners, and which you could correct at the same time as you incorporate the altered "good cause" clause into the Assurance. A copy of your submission on behalf of Quality Brine is enclosed, with the errors circled. Mr. R.W. Gallini March 12, 1984 Page 2

4 -

I see no reason to alter the schedule of compliance in Quality Brine's Assurance, if that is agreeable to you and your client.

Sincerely,

Ó. arg

Paige Grant Hydrologist Ground Water Section

PG:egr

### Enclosure

cc: Danny Watson, Quality Brine John Guinn, EID District IV, Manager

mst

LAW OFFICES

C. GENE SAMBERSON R. W. GALLINI JERRY L. WILLIAMS DAVID L. HARRINGTON HEIDEL, SAMBERSON, GALLINI, WILLIAMS & HARRINGTON 311 NORTH FIRST STREET POST OFFICE DRAWER 1599 LOVINGTON, NEW MEXICO 88260 (505) 396-5303

F. L. HEIDEL OF COUNSEL

February 23, 1984

RECEIVED

FEB 24 1984

Mr. David G. Boyer Environmental Improvement Division P.O. Box 968 Santa Fe, New Mexico 87504-0968

GROUND WATER/HAZARDOUS WASTE BUREAU

Re: Application of Quality Brine For Approval of Discharge Plan, Assurance of Discontinuance

Dear Mr. Boyer:

Enclosed herewith please find an original and two (2) copies of the Assurance of Discontinuance which we prepared on behalf of Danny Watson d/b/a Quality Brine in connection with the above referenced matter.

It is our understanding that this matter will be on the agenda of the Water Quality Control Commission on Tuesday, March 13, 1984, in Santa Fe. Therefore, we would appreciate your reviewing the instrument and let me know what, if any, changes need to be made.

We would also appreciate verification of this item being on the agenda and considered by the Water Quality Control Commission on Tuesday, March 13, 1984.

Very truly yours,

HEIDEL, SAMBERSON, GALLINI & WILLIAMS

D. e Tallen

R. W. Gallini

RWG:ds

Enclosure

cc Danny Watson

#### ASSURANCE OF DISCONTINUANCE

WHEREAS, on December 8, 1983, the Director of the New Mexico Environmental Improvement Division ("EID") requested Quality Brine ("QB") to submit a Discharge Plan pursuant to \$\$3-104 and 5-101.B.3 of the New Mexico Water Quality Control Commission ("Commission") regulation for its discharges from its brine facility and brine well located in Section 21, Township 12 South, Range 36 East, N.M.P.M., Lea County, New Mexico; and

WHEREAS, neither the regulations nor an extension to discharge without an approved Discharge Plan issued by the Director, nor any Court Order, allows QB to operate an injection well and associated surface facilities without an approved Dishcarge Plan, and

WHEREAS, recent water quality analysis of nearby and adjacent wells did not indicate any present contamination of drinking water sources due to operations at the site; and

WHEREAS, QB has committed to the Commission to proceed with all diligence to prepare and secure an approved Discharge Plan; and

WHEREAS, the Commission and QB deem it appropriate to enter into this Assurance of Discontinuance.

QB assures the Commission as follows:

1. <u>ASSURANCE</u>: All unapproved discharges at the QB Brine Facility shall be discontinued as set forth in Paragraph 2 of the Assurance of Discontinuance.

2. <u>SCHEDULE OF COMPLIANCE</u>: It is agreed that the Discharge Plan shall comply with the following schedule:

QB shall submit plans Α. and specifications of the in situ extraction well to the EID on or before June 15, 1984. B. QB shall submit a proposal outlining measures to be taken to correct any possible violation of the Water Quality Control Commission Regulations resulting from surface activities on or before June 15, 1984. C. EID shall complete review of QB materials submitted by March 15, 1984, and EID shall provide comments to QB on or before August 15, 1984. D. QB shall submit the information listed in §5-102.B.1d and the information listed in §5-203.A of the Water Quality Control Commission Regulations to the EID on or before November 30, 1984. E. EID shall complete review of QB materials submitted under Paragraph 2.D herein and EID shall provide comments to QB on or before January 30, 1985. OB shall submit a com-F. plete Discharge Plan which shall address all applicable requirements of the Water Quality Control Commission Regulations, Parts 3 and 5 on or before March 29, 1985. G. EID shall complete review of Discharge Plan Application and EID shall provide comments to OB on or before June 3, 1985. H. QB shall submit responses to the EID comments on or before August 1, 1985. EID Director's approv-I. al or disapproval of Discharge Plan Application shall be promulgated on or before Ocotber 1, 1985. If a public hearing is scheduled by the EID Director pursuant to §3-108 of the Commission's Regulations, all deadlines in Paragraphs 2.G through 2.I shall be 45 days later.

-2-

3. <u>MUTUAL COOPERATION</u>: QB and the EID shall mutually cooperate in accomplishing on a timely basis the matters contemplated by this Assurance. In this respect, direct communication among QB representatives and EID personnel is encouraged.

4. <u>MEETINGS</u>: It is understood that QB and the EID shall meet on at least two occasions to discuss the progress during the initial 240 days of the Compliance Schedule. The first meeting shall take place on approximately the 90th day, and the second meeting on approximately the 150th day, as the parties may mutually and reasonably agree. EID shall endeavor to communicate any concerns which might necessitate additional information so as to allow QB sufficient time to respond.

5. <u>GOOD CAUSE</u>: It is expressly understood that in the event additional time is requested by QB for any of the compliance dates enumerated in Paragraph 2 for purpose of any request made to the Commission "good cause" shall include, but not be limited to situations where:

(a) there is a required response to issues that QB did not anticipate or address in a timely manner and should not have reasonably anticipated or addressed in a timely manner; or

(b) there are delays in procurement, fabrication, installation, vender selection and testing caused by parties other than QB entirely beyond the control of QB.

6. <u>ENFORCEMENT</u>: The Commission shall not undertake enforcement against QB for the continuation of current discharges occurring during the pendency of this Assurance without first

-3-

giving QB 15 days prior written notice by the Director that QB is in violation of the terms of this Assurance. This Paragraph shall not preclude appropriate action by the Director or the Commission under §74-6-11 N.M.S.A. 1978.

Failure by QB to comply with any condition of this Assurance of Discontinuance shall be actionable as a violation of the Water Quality Act and of this Assurance under §§74-6-5 and 10 N.M.S.A. 1978, as applicable.

Nothing in this Assurance of Discontinuance shall relieve QB from the responsibility for complying with all the provisions of the Water Quality Act, the regulations promulgated thereunder or any other provision of law except as otherwise specifically provided herein.

7. <u>NO ADMISSION</u>: The terms, execution and any conduct in accordance herewith shall not constitute an admission of any kind by QB relating to matters under the Water Quality Act, Commission regulations, or any other matters relating to health or environment.

Signed and acknowledged this day of , 1984.

#### Danny Watson d/b/a Quality Brine

STATE OF NEW MEXICO ) : SS COUNTY OF\_\_\_\_)

£ . - 5

The foregoing instrument was acknowledged before me this \_\_\_\_\_\_day of \_\_\_\_\_\_, 19\_\_\_, by Danny Watson, d/b/a Quality Brine.

My Commission Expires:

Notary Public

APPROVED:

WATER QUALITY CONTROL COMMISSION

By

Steven Asher, Chairman Water Quality Control Commission

STATE OF NEW MEXICO ) : SS COUNTY OF )

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_, by Steven Asher, Chairman of the Water Quality Control Commission, on behalf of the Water Quality Control Commission.

My Commission Expires:

Notary Public

2 - 1 STATE OF NEW MEDICO MEMORANDUM OF MEETING OR CONVERSATION VIRONNEM Date Time 4:20 Telephone Personal 4 Ì Other Parties Originating Party. 398-3490 2 Subject isco som 5 · . Discussion her old ð a the H he nee CO ca exce  $\mathcal{C}$ al months Ċð • • Conclusions or Agreements Signed Distribution

#### ASSURANCE OF DISCONTINUANCE

WHEREAS, on July 28, 1983, the Director of the New Mexico Oil Conservation Division ("OCD") requested Kenneth Tank Service ("KTS") to submit a Discharge Plan pursuant to §§ 3-104 and 5-101.B.3 of the New Mexico Water Quality Control Commission ("Commission") regulation for its discharges from its brine facility and brine well located in Section 27, Township 9 South, Range 35 East, N.M.P.M., Lea County, New Mexico; and

WHEREAS, neither the regulations nor an extension to discharge without an approved Discharge Plan issued by the Director, nor any Court Order, allows KTS to operate an injection well and associated surface facilities beyond November 10, 1983, and

WHEREAS, recent water quality analysis of nearby and adjacent wells did not indicate any present contamination of drinking water sources due to operations at the site; and

WHEREAS, KTS has committed to the Commission to proceed with all diligence to prepare and secure an approved Discharge Plan; and

WHEREAS, the Commission and KTS deem it appropriate to enter into this Assurance of Discontinuance.

KTS assures the Commission as follows:

1. <u>ASSURANCE</u>: All unapproved discharges at the KTS Brine Facility shall be discontinued as set forth in Paragraph 2 of the Assurance of Discontinuance.

2. <u>SCHEDULE OF COMPLIANCE</u>: It is agreed that the Discharge Plan shall comply with the following schedule:

A. KTS shall submit plans and specifications of the in situ extraction well to the EID

B. KTS shall submit a proposal outlining measures to be taken to correct any possible violation of the Water Quality Control Commission Regulations resulting from surface activities

C. EID shall complete review of KTS materials submitted by March 15, 1984, and EID shall provide comments to KTS

D. KTS shall submit the information listed in §5-102.B.1d and the information listed in §5-203.A of the Water Quality Control Commission Regulations to the EID

E. EID shall complete review of KTS materials submitted under Paragraph 2.D herein and EID shall provide comments to KTS

F. KTS shall submit a complete Discharge Plan which shall address all applicable requirements of the Water Quality Control Commission Regulations, Parts 3 and 5

G. EID shall complete review of Discharge Plan Application and EID shall provide comments to KTS

H. KTS shall submit responses to the EID comments

I. EID Director's approval or disapproval of Discharge Plan Application shall be promulgated

If a public hearing is scheduled by the EID Director pursuant to §3-108 of the Commission's Regulations, all deadlines in Paragraphs 2.G through 2.I shall be 45 days later.

on or before March 15, 1984.

on or before March 15, 1984.

on or before May 15, 1984.

November 30

on or before August 31, 1984.

on or before October 31, 1984.

March 29 on or before December 31, 1984.

on or before March 4, 1985. *August* on or before May 1, 1985

on or before July 1, 1985.

3. <u>MUTUAL COOPERATION</u>: KTS and the EID shall mutually cooperate in accomplishing on a timely basis the matters contemplated by this Assurance. In this respect, direct communication among KTS representatives and EID personnel is encouraged.

4. <u>MEETINGS</u>: It is understood that KTS and the EID shall meet on at least two occasions to discuss the progress during the initial 240 days of the Compliance Schedule. The first meeting shall take place on approximately the 90th day, and the second meeting on approximately the 150th day, as the parties may mutually and reasonably agree. EID shall endeavor to communicate any concerns which might necessitate additional information so as to allow KTS sufficient time to respond.

5. <u>GOOD CAUSE</u>: It is expressly understood that in the event additional time is requested by KTS for any of the compliance dates enumerated in Paragraph 2 for purpose of any request made to the Commission "good cause" shall include, but not be limited to situations where:

(a) there is a required response to issues that KTS did not anticipate or address in a timely manner and should not have reasonably anticipated or addressed in a timely manner; or

(b) there are delays in procurement, fabrication, installation, vender selection and testing caused by parties other than KTS entirely beyond the control of KTS.

6. <u>ENFORCEMENT</u>: The Commission shall not undertake enforcement against KTS for the continuation of current discharges occurring during the pendency of this Assurance without first

-3-

giving KTS 15 days prior written notice by the Director that KTS is in violation of the terms of this Assurance. This Paragraph shall not preclude appropriate action by the Director or the Commission under §74-6-11 N.M.S.A. 1978.

Failure by KTS to comply with any condition of this Assurance of Discontinuance shall be actionable as a violation of the Water Quality Act and of this Assurance under §§74-6-5 and 10 N.M.S.A. 1978, as applicable.

Nothing in this Assurance of Discontinuance shall relieve KTS from the responsibility for complying with all the provisions of the Water Quality Act, the regulations promulgated thereunder or any other provision of law except as otherwise specifically provided herein.

7. <u>NO ADMISSION</u>: The terms, execution and any conduct in accordance herewith shall not constitute an admission of any kind by KTS relating to matters under the Water Quality Act, Commission regulations, or any other matters relating to health or environment.

Signed and acknowledged this 18th day of Wanyauy , 1984.

d/b/a Kenneth ina Tank Service

STATE OF NEW MEXICO ) : SS COUNTY OF SANTA FE )

The foregoing instrument was acknowledged before me this  $\frac{16^{14}}{10^{14}}$  day of  $\frac{19.84}{10^{14}}$ , by C. K. Kinsolving, d/b/a Kenneth Tank Service.

My Commission Expires:

10-25-86

APPROVED:

WATER QUALTTY CONTROL COMMISSION

Bv

Stovén Asher, Chairman Water Quality Control Commission

STATE OF NEW MEXICO ) : SS COUNTY OF SANTA FE )

The foregoing instrument was acknowledged before me this  $17^{\frac{t}{L}}$  day of ganuary, 19 $\frac{1}{2}$ , by Steven Asher, Chairman of the Water Quality Control Commission, on behalf of the Water Quality Control Commission.

My Commission Expires:

16-25-86

11.15

Notary Public

Meeting of Quality Brine 16184 DANNY WATSON R.O. BOX & TATUM N. Mex 88267 Phil Withrow P.O. Boy 2292 Hobbs noney STAN WATSON PO. Box 56 TATUM N.M. 88267 Wotes of Bough Water & Bough EID-UIC Danny Walson prepriet a leller Aglainind the cuiumstances of their Onstructing and operating The brine well. He also presented forms Abouring that he had applied to that he thought were necestary. Part 3 deadlines for opproval under Part 3, and the fort that no temporary permit or estepsion could be given. I told him about The assurance of discontinuance and that KIS Wappearing on 1/10 before the WQCE, I told him that it would be the next meating before the WACC would be able to consider an assumance (March), and that R. W Gallini leres

representating KTS ( Refe is Watson't Lockyer in some matters He will talk to Gallini and Galleri may touch lose with us on 1/10 War Meeting I speri time talking about the Reak as they apply to both their well and surface papilities. Walson said well has been shut in sand they received Souder's letter; I said there was no way to permit well and they proceeded at our nish if they like it. I gove them a copy of their of Lischarge plans.

QUALITY BRINE PO Box 5967 Hobbs, NM 88241

January 5, 1984

TO WHOM IT MAY CONCERN:

Stan Watson, Phil Withrow and I (Danny Watson) decided to drill a brine well in February, 1983.

We consulted with the Oil Conservation Commission in Hobbs to try to take all precautions necessary to protect all individuals in and around the vtcinity of our proposed brine well site.

It was at that time we got all paper work from them and sent in our proposed plans. They were okayed by OCC and we were informed we could go ahead on February 24, 1983.

Due to weather conditions, we were not able to start drilling until April 4, 1983. We then drilled down to the top of the salt formation, moved the rig off, put the reverse unit in the hole and drilled to see how thick the salt was. Three days after the reverse unit was on location, we built a pad and set three 1,000 barrel tanks. The date at this point was April 28, 1983.

We coated and hooked up the tanks, got the displacement pump in and hooked up, and then completed the well.

We were then notified by Mr. Eddy Seay that Oscar Simpson was going to be in town on May 5, 1983. Mr. Seay requested for one of us to come by and visit with Mr. Simpson. I met with Mr. Seay and Mr. Simpson on that date at the OCC office.

It was at that time that Mr. Simpson explained that the regulations that pertained to brine wells would be followed. Then and only then was Mr. Seay and I made aware of Part Five of the Water Quality Control Commission.

### RECEIVED

1

JAN 6 1984

GROUND WATER/HAZARDOUS WASTE

Mr. Simpson told Mr. Seay and I that if I would get this paper work in, there would be no problem, and he would then have it posted for public notice for 30 days and then give us written permission to operate.

We got the paper work together and sent it in to the attention of Mr. J@e Ramey. We asked for verbal permission to operate. At this time, it was the end of the third week in May. Mr. Simpson was on vacation, I believe, and Mr. Ramey gave us permission verbally to operate.

About the second week of June, Mr. RAmey asked Mr. Seay to stop operation of Quality Brine sales because it states in Part Five that no verbal permission can be given until the completed plan has been approved.

Mr. Simpson then called me and told me he wanted to come and inspect our brine station. He planned on being in Hobbs around the end of July. Mr. Seay called and said that Mr. Simpson and he himself would be at the brine station on July 22, 1983 for Mr. Simpson to inspect it.

Mr. Seay, Mr. Simpson, Stan Watson and I all met at the brine station. At that time, Mr. Simpson requested three or four more pictures, and said the water monitor wells needed to be tested.

Mr. Simpson took the pictures himself. He said he would go back to Santa Fe and post this plan for public notice for 30 days according to law. He said we should receive permission to run in 60 to 90 days, but it would be no longer than 90 days. He also said that if we would get out specific coductance tests, he would add them to his file. The description and completion plans were enough for him to go ahead with the public notice and his proceedings.

At this time, I was told by Mr. Simpson the brine wells were going to be transferred to the Environmental Improvement Division, and that he was going to be transferred to the EID also.

Mr. Simpson called me back about three weeks later to let

me know that he had received our water monitor well report and pictures, and he was going to post our plans for public notice at that time. I asked him if we could operate the brine station because we were having to make payment on a note and he said, "I realize ya'll do, and I ought to have written approval out in about three weeks. I don't really see a problem with anything." I thanked him for his time.

In September, 1983, Mr. Sexton with the OCC, Mr. Seay and I all visited briefly about the brine station, and I told them what Mr. Simpson said to me.

Around October 3, 1983, Mr. Simpson called and wanted to know when I sent the brine well report in as there wasn't a date on the front of it. I looked back in my file and told him that according to the dates on a revised copy sent in, we mailed it about June 1, 1983, and that he should have received it by June 9, 1983. I thought he might have received it before that date in all actuality. He then confirmed that the June 9th date was okay with me, and I told him yes. He apologized and said he had been transferred to the EID and everything still looked good, but they needed to review the plans one more time. He saw no problems at that time and said that written approval was on it's way, to go ahead and do as I needed. I then called Mr. Withrow and told Stan Watson of the conversation.

The last part of November, 1983, we received a phone call from Randy Hicks with a consulting firm in Albuquerque. He said he had looked at our report and he could see some problems and that the EID was not going to approve our plans. He said he just wanted to get his name in the hat.

We first told him that we were not aware of any problems and that as far as we knew, everything was okayed by Mr. Simpson. He told me he would send us a list of his fees and services just in case. I agreed to that.

Two to three weeks later, we received a registered letter from Steve Asher directing us to shut down, with which we complied.

All these dates are as close and accurate as I can remember. The statements made by me, or whom was quoted, are very accurate.

Sincerely, > Water

Danny Watson

PHIL WITHROW B&E, INC. TRANSPORTATION OF OILFIELD EQUIPMENT & SUPPLIES

P.O. BOX 2292

HOBBS, N.M. 88240

PHONE (505) 393-0762 N.M.S.C.C. NO. 1015-1

January 10, 1983

TO WHOM IT MAY CONCERN:

B & E, Inc proposes to drill a brine supply well in the vicinity of:

Blocks one (1), Two (2), Three (3) Four (4) Five (5) Six (6) Seven (7) and Eight (8), West Addition to the Town of Tatum, Lea County, New Mexico.

Using a rotary drilling rig, we propose to drilla surface hole to 300 ' - run 8 5/8" casing to circulate cement back to surface. ..Pick up smaller tools and continue to drill to depth of 2300' and circulate cement back to surface.

Then move rig off.. rig up pulling machine and reverse unit. Pick up small tools and drill through the salt section, approximately 400 '. Hang tubing on well head and begin to circulate freh water down tubing and back through salt section through 5½" casing to surface thus into three (3) 1000 barrel steel plastic coated storage tanks. The storage tanks will be encased by a dirt holding dike with five (5) foot high walls ten )10) feet thick at a distance of thirty(30) feet from outside of the outermost part of the tanks on both sides and both ends. In additon the entire complex will be fenced with a chain link fence six (6) foot high with three (3) strands of barbed wire on top at a distance of ten (10) feet from the outermost part.

Enclosed is a diagram of the casing program and tank battery.

Phil Withrow, President

Sincerely yours,

## RECEIVED

#### JAN 6 1984

GROUND WATER/HAZARDOUS WASTE BUREAU

#### EGAL NOTICE

NOTICE is hereby given that on December 22, 1982 Danny R. Watson, Box 8, Tatum, NM 88267 filed an application number L-632-A with the STATE ENGINEER for permit to change location of shallow well and place and purpose of use of 15.0 acre-feet of shallow ground water per annum by abandoning the use of Well No. L-632 located in the NW4SW4SE4 of Section 21, Township 12 South, Range 36 East, NMPM, for the irrigation of 5.0 acres of land described as follows:

SUBDIVISION	SECTION	TOWNSHIP	RANGE	ACRES
NW4SE4SE4	21	12-S	36-E	5.0

and drilling a shallow well No. L-632-A, 7 inches in diameter and approximately 160 feet in depth, at a point in the SE4/SE4 of Section 20, Township 12 South, Range 36 East, NMPM, for the diversion of 15.0 acre-feet of shallow ground water per annum for a commercial water station located in the SE4/SE4 of Section 20, Township 12 South, Range 36 East, NMPM.

Old well to be retained for other rights.

¢

Any person, firm, association, corporation, the State of New Mexico or the United States of America, deeming that the granting of the above application will impair or be detrimental to their water rights, may protest in writing the proposal set forth in said application. The protest shall set forth all protestant's reasons why the application should not be approved and must be filed, in triplicate, with S. E. Reynolds, State Engineer, P. O. Box 1717, Roswell, New Mexico, within ten (10) days after the date of the last publication of this Notice.

Published in the Lovington Daily Leader December 30, 1982 and January 3 and 13, 1983.

# RECEIVED

# JAN 6 1984

GROUND WATER/HAZARDOUS WASTE BUREAU

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Description         Lease         MATSON BETWE - WELLS         Weight           0 Lense         Tremention		WELL	LEGATION A	ND ACREAGE D	EDICATION	P	Supersedes C+128 Effective 1-1-65
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593       test ment the SOUTH       ine of       639       test time the       NEST       the         and I producting formation       Point       Institute Arrange       Arrange         1. Outline the acreage dedicated to the aubject well by colored pencil of herbure marks on the plat below.       Institute Arrange         2. If more than one lease is dedicated to the well, outline cach and identify the ownership thereof (both as to working interest and royalty).       If more than one lease of different ownership is dedicated to the well, have the interests of all owners here consolution interests and interestery).         3. If more than one lease is 'no.'' list the owners and tract descriptions which have actually here consolidated. (I se reverse side of this form if necessary).       If answer is ''revel'' type of consolidation			5001h	JU LASI			
and Erect Elev.     Production Frommon     Salt     Arree     Salt     Arree	•	_		630		LIFST	1. A.
SB1E       Arrent         1. Outline the acreage dedicated to the subject well by colored pencil of bachure marks on the plat below.       Arrent         2. If more than one lease is dedicated to the well, outline cach and identify the ownership thereof (looth as to working interest and royalty).       If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated (it see reverse side of this form if answer is "no." This the owners and tract descriptions which have actually been consolidated (it see reverse side of this form if accessery.)         No allowable will be assigned to the well until all interests have been consolidated (it see reverse side of this form if accessery.)       No allowable will be assigned to the well until all interests have been consolidated (it see reverse side of this form if accessers).         No allowable will be assigned to the well until all interests have been consolidated (it see reverse side of this form interests) or until a non-standard unit, eliminating such interests, have been on an out of apple to the commission.         I ARN 6 1984       If answer is "yes?" type of consolidated unit, eliminating such interests, have been on the used capter to use beet of my transing on there is the interesting and capters to use beet of my transing on there is the interest of agence to use the interest and capter to use beet of my transing and capter to use beet of my transing and capter to use the of an interest and capter to use the actual that the capter of the interest of an interest and capter to use the actual that the capter of the interest of an interest and capter to use the actual that the capter of the interest of an interest and capter to use the actual that the capterest and capter of the the set of any trans			line and		ieel trom the		
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Sinn. CERTIFICATION: I hereby certify that the information con- remed herein is true and complete to the best of my knowledge and belief. B&E Inc. & Watson Treating Plant Inc. Plant Inc. BUREAU BUREAU GROUND WATER/HAZARDOUS WASTE BUREAU Continue of the solar was plated from teid news of actual surveys made by me or under my supervision, and that the some to the actual surveys made by me or under my supervision and that the some to the solar was plated from teid news of actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the actual surveys made by me or under my supervision and that the some to the surveys 2/18/83 Herefore surveys The actual term inter- BUREAU For the surveys to the surveys	Yes If answer is "n this form if nec No allowable wi	No If answer of list the owner essary.) III be assigned to t	is "yes," type s and tract des he well until a	of consolidation _ criptions which h ll interests have l	ave actually	dated (by commu	nitization, unitization,
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ENERGY AND MINERALS DEPARTMENT	
L CONSERVATION DIVISIO	•
DISTRIBUTION P. O. BOX 2088	Form C-103
SANTA FC SANTA FE, NEW MEXICO 87501	Revised 10-1-78
FILE	Sa. Indicate Type of Lease
U.S.C.S.	State Fro K
LAND OFFICE .	5. Stote Oil & Gus Lease No.
OPENATOR	
	Fee
SUNDRY NOTICES AND REPORTS ON WELLS	
USE "APPLICATION FOR PERMIT _" (FORM C-101) FOR SUCH PROPOSALS.)	7, Unit Aureen.ent Some
will will other. Brine Supply Well	B&E Inc.
Name of Operator	8, Farm of Lease Name
Watscn Brothers	Watson
Address of Operator	9. Well No.
Box 8 Tatum, New Mexico 88267	· # 1
Location of Well	10. Field and Pool, or Wildcot
	•
UNIT LETTER 593 FEET FROM THE SOUTH LINE AND 639 FEET	·/////////////////////////////////////
West LINC, SECTION 20 JOWNSHIP 12 RANGE 36 NO	
THE LINE, SECTION 4U TOWNSHIP 10 KINGE 20 NI	
TTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTTT	12. County
	Lea
6. Check Appropriate Box To Indicate Nature of Notice, Report or	Other Data
•••••	ENT REPORT OF:
PERFORM REMEDIAL WORK PLUG AND ABANDON REMEDIAL WORK	ALTERING CASING
TEMPORARILY ASANDON COMMENCE DRILLING OPHS.	PLUG AND ANANDONNENT
CHANGE PLANS CASING TEST AND CEMENT JOB	
OTHER	······
7. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, inclu work) SEE RULE 1103.	ding estimated date of starting any proposed
	×
1. Rig up drilling rig.	
2. Drill to 2000', run $5\frac{1}{2}$ " casing to total depth.	
3. Circulate cement back to surface ( appoximatley 500 s	sacks class C 2% CAC-12
<ol> <li>Circulate cement back to surface ( appoximatley 500 s</li> <li>Wait on cement 12 hours.</li> </ol>	sacks class C 2% CAC-12
4. Wait on cement 12 hours.	sacks class C 2% CAC-12
4. Wait on cement 12 hours.	sacks class C 2% CAC-12)
<ol> <li>Wait on cement 12 hours.</li> <li>Rig down drilling rig and move off.</li> <li>Rig up pulling machine and reverse unit.</li> </ol>	· · · · · · · · · · · · · · · · · · ·
<ul> <li>4. Wait on cement 12 hours.</li> <li>5. Rig down drilling rig and move off.</li> <li>6. Rig up pulling machine and reverse unit.</li> <li>7 Pick up 2 7/8 tubing and drill out from under 5½ casin section ( total depth approximately 3000'.) Expect 70</li> </ul>	ng and through salt 00 to 800' of salt.
<ul> <li>4. Wait on cement 12 hours.</li> <li>5. Rig down drilling rig and move off.</li> <li>6. Rig up pulling machine and reverse unit.</li> <li>7 Pick up 2 7/8 tubing and drill out from under 5½ casin section ( total depth approximately 3000'.) Expect 70</li> <li>8. Hang tubing and circulate fresh water down tubing on</li> </ul>	ng and through salt 00 to 800' of salt.
<ul> <li>4. Wait on cement 12 hours.</li> <li>5. Rig down drilling rig and move off.</li> <li>6. Rig up pulling machine and reverse unit.</li> <li>7 Pick up 2 7/8 tubing and drill out from under 5½ casin section ( total depth approximately 3000'.) Expect 70</li> </ul>	ng and through salt 00 to 800' of salt.
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## Rovised 6-17-77

## STATE OF NEW MEXICO

# ONE WELL PLUGGING BOND

FOR CHAVLS, EDDY, LEA, MCKINLLY, RIO APPIBA, ROOSEVELT, \* SANDOVAL, AND SAN JUAN COUNTIES ONLY

BOND NO. \_2980227

ANOUNT OF DOND 5,000

COUNTY -

NOTE: For wells less than 5,000 feet deep, the minimum bond is \$5,000.00\* For wells 5,000 feet to 10,000 feet deep, the minimum bond is \$7,500.00\* For wells more than 10,000 feet deep, the minimum bond is \$10,000.00 For wells more than 10,000 feet deep, the minimum bond is \$10,000.00

"Under certain conditions, a well being drilled under a \$5,000.00 or \$7,500.00 bond may be permitted to be drilled as 500 feet deeper than the normal maximum depth, i.e., a well being drilled under a \$5,000.00 bond may be permitt to 5,499 feet, and a well being drilled under a \$7,500.00 bond may be permitted to go to 10,500 feet.

File with Oil Conservation Commission, P. O. Box 2088, Santa Fe 87501

# KNOW ALL MEN BY THESE PRESENTS:

in the State of New Mexico), as FRINCH ALL and Lews of the State of <u>Washington</u> corporation oreanized and existing under the laws of the State of <u>Washington</u> and authorized to do business in the State of New Mexico, as SURETY, are held firmly bound unto the State of Sev Mexico, for the use and benefit of the Oil Conservation Commission of New Mexico pursuant to Section 05:3-11. New Mexico Statutes Annotated, 1953 Compilation, as amended, in the sum of <u>\$5,000.00</u> Mexico Statutes Annotated, 1953 Compilation, as amended, in the sum of <u>\$5,000.00</u> Dollars lawfel money of the United States, for the payment of which, well and truly to be made, said PRINCH ALL and SURETY hereby bind themselves, their successors and assigns, jointly and severally, family 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 dioxides  $(CO_2)$  gas leases, or helium gas leases with the State of New Mexico; and

WHERFAS, The above principal has heretofore or may bereafter enter into oil and gas leases, or carbon dioxide . (CO<sub>2</sub>) gas leases, or helmin pas leases on lands patented by the United States of America to private individuals; and on lands otherwise owned by private individuals; and

WIII III AS De above principal, individually, or an association with one or more other partice. Accommendation may commerce the duffag of one well not to exceed a depth of less than 3000 effits prospection and positive effort of gas, or carbon dioxide (CO<sub>2</sub>) gas or helium gas, or does own or may acquire, own or operate such well, or shell well of started by others on land embraced in said State of and gas leases, or carbon dioxide (CO<sub>2</sub>) leases or helium gas leases, and on land patented by the United States of America to private individuals, and on land otherwise owned by private individuals, the identification and location of said well being <u>593 ft; from S. line and 639 Feet from W</u> (there state exact legal subdivision by durate nactor built).

NOW, THERFFORE, If the above bounden principal and surety or either of them or their successors in assigns, or any of them, shall plug said well when dry or when abandoned in accordance with the roles, regulations, and inders 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.

> GROUND WATER/HAZARDOUS WASTE BUREAU

JAN 6 1984

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PRINCIPA	SURI	ITY
P.O. Box 2292 Hobbs. NM 88240	Safeco Plana Seattle, Washingto	on
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Dan's Watson, President	. <b>.</b>	
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My Commission expires Note: Corporate survey attach power of attorney.)		
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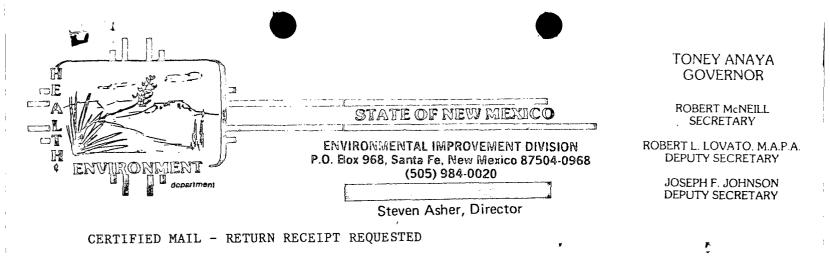
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STATE OF NEW MEXICO MEMORANDUM OF MEETING OR CONVERSATION ENVIRONMENT Date Time 10:00 AM Personal Telephone 12 Originating Party Other Parties Phil WithRow (Partner with 2 in Quality Brine là 1983, compleance Brind Discussion Withrow celled to ask son more information on letter und whether they could get a groce period. After arbing he provided me with the Following informa The frine well was drilled the first part of this year; The have been operating for 7- & months; b Vine Meron to OCD inJune of 82; Letter of 15/8 First ime 21 port 5 UK nequirements; have sound to comply J. With an OCE row claims The reas la Romey gave permission VAC him a ×1 the chanceover from Oc Bonera ssurance of biscontinuale IL of on The poffi Conclusions or Agreements l'orgument bu Dithrour 73 in Amabilitya letter to instur ling / OCA never erloal permittion BODEro te, 1192 intent Scomply 20 will be clean. We will appequilations 1 Mamp Distribution of his affertions. Signed Quality Brine File.

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December 8, 1983

Danny Watson Quality Brine P.O. Box 75 Tatum, NM 88267

RE: Watson #1 Brine Manufacturing Well

Dear Mr. Watson:

The responsibility for regulating brine production wells has been transferred from the Oil Conservation Division (OCD) to the Environmental Improvement Division (EID). Your discharge plan materials submitted to OCD on June 9, 1983, have been reviewed by this office. The information required to obtain an approved discharge plan under Part 5 (Underground Injection Control) of the Water Quality Control Commission (WQCC) Ground Water Regulations is of a technically complex nature. The information you have submitted to date does not address the majority of WQCC Part 5 concerns. Generally dischargers find it necessary to hire a professional consultant with expertise in Underground Injection Control. At your request, I will provide you with a list of consultants who have done such work in New Mexico.

I will enumerate briefly the areas which need to be addressed in future submittals in order to complete your discharge plan. They are as follows:

<u>3-106.C.</u> Quantity and quality of the discharge need to be addressed in more detail. Specifically an analysis of brine should include: major anions and cations and TDS. Flooding potential should be quantified for the twenty-four hour, 100 year flood event. Site design should include plans and specifications detailing how Quality Brine will prevent seepage from transfer areas and overflow ponds from causing ground-water standards to be exceeded. Typically this would involve lining the pond and using concrete pads with sumps in the brine transfer areas. Information concerning the depth to water (static water levels) in water-supply wells, water quality (major anions, cations, and TDS) of these wells, and direction of ground-water flow in the area should be submitted.

5-202 and 5-203 All wells (including oil wells, brine wells, water wells, etc.) within the area of review (as defined by 5-202) must be identified, and

EQUAL OPPORTUNITY EMPLOYER

action taken to assure that they are properly completed or properly abandoned.

5-204 Mechanical integrity test results performed at maximum operating pressure must be provided and a description of how the test was conducted.

5-205.A.3. You have already provided some of this information. A discussion on injection pressures needs to be submitted. Also a discussion of the waterbearing characteristics of the Red Beds should be submitted.

<u>5-205.C.2.</u> It may be possible to use existing, hydraulically down-gradient wells that bottom in the Ogalla Formation as monitoring wells. You may submit such a proposal including a monitoring schedule.

5-206 If injection is under gravity pressure this should be stated, otherwise indicate what injection pressure will be used.

5-207, 5-208 and 5-209 These sections of the regulations need to be addressed in considerable detail. The information presented to date concerning plugging and abandonment does not go into adequate detail.

The above comments are a general enumeration of the information required in order to complete your discharge plan. This brief review is not intended to list every item of information which is required but merely to give you an idea of the scope of a completed discharge plan under Part 5 of the WQCC Regulations. For ease of review your future submittals should track the order of the various sections of the regulations which require the information.

I remind you that your brine production well may not be used until you have obtained an approved discharge plan. Violation of these regulations pursuant to NMSA 74-6-5 is a misdemeanor punishable by a fine up to \$10,000 per day, or imprisonment up to one year, or both.

If you have any questions, please contact David Boyer at the above address and telephone number (ext. 303). We are available to meet with you or your consultant to discuss these concerns in more detail.

Sincerely,

King South

Karl Souder Ground-Water Hydrologist Ground Water Permitting and Compliance Section cc: Richard Young, EID Chief Attorney John Guinn, EID Dist. IV, Manager Joe Ramey, Oil Conservation Division EID Field Office, Hobbs

KS:egr

msz

Quality Brine Tatum, NM August 28,1983

Picture #2----is from West to East.

The #1 and #2 Tanks are brine tanks. They are each coated with a Flake Line material (Polyester)

These tanks are also entirely coated --- Top, sides and bottom.

All tanks were tested after coating for pin holes. There were absolutely none found.

We feel we have taken every precaution necessary to prevent harm to anyone.

This is a supplamentry to the Original file for Quality Brine of Tatug, New Mexico.

# RECEIVED

# SEP 0 8 1983

EID: WATER POLLUTION CONTROL Quality Brine Tatum N.Mex

#### August 28,1983

3 new 1000 BBLS tanks are totally coated, all sides and bottom.

Pictures #1----Is East to West

Picture #1----East tank is fresh water tank. It is coated with Enckynhenolic(Matcote #850-851) The tank is applicable for holding drinking water.

# STATE ENGINEER OFFICE

WELL	RECORD	
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Revised Junc 1911

			Section 1.	GENERAL IN	FORMATION			
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Section 6. LOG OF HOLE Depth in Feet Thickne Color and Type of Material Encountered in Feet From То Clark 3 top Doil 3 C Caliche 18 3 white h with sand -WIB 36 18 18 white Calinh 36 411 5 sand w/ light clay W/B /3 5 3 41 Rito 3 hard .53 56 cartite 7 56 63 Clay Clay WI small gravell 63 80 7 40 \_80 25 Clay 105 rug 105 110 5 yellow Clay - hard 110 111 4 111 115 tone - hard 115 116 Ene Clay 116 3 nostone-hard 120 119 120 128 8 Blue Class ayened hard + soft sandstone, grey & tan 34 125 167 162 TD

Section 7. REMARKS AND ADDITIONAL INFORMATION

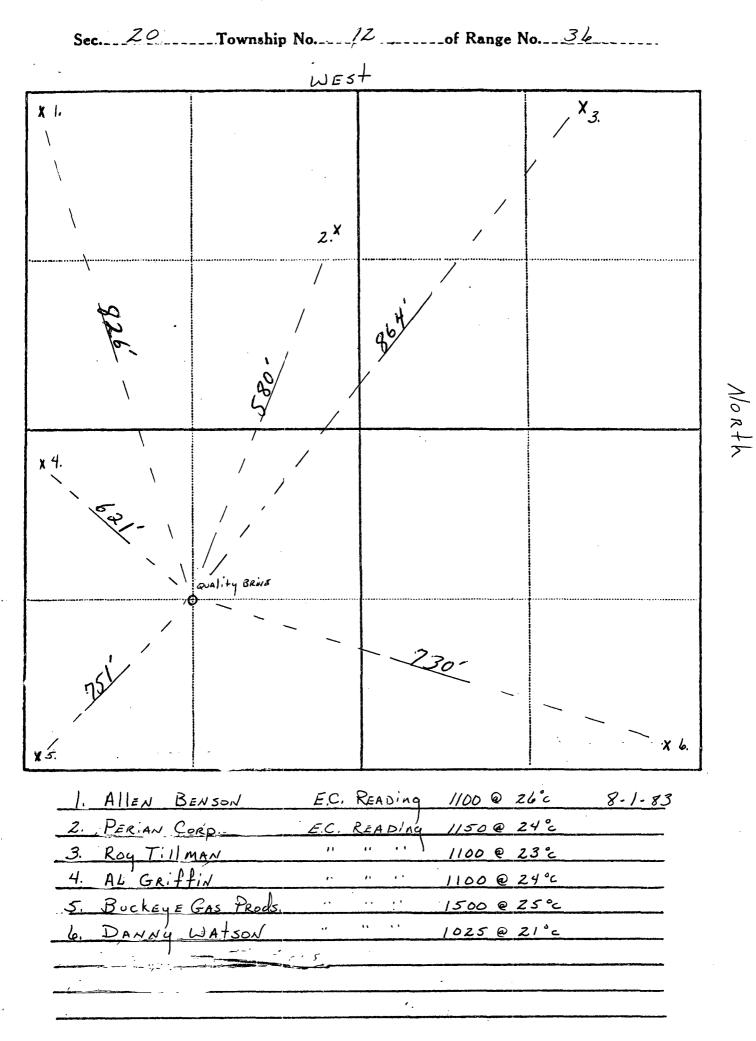
From 110' to TD yellow clay chunks being drilled difficult to discen as to color and Textue

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described hole.

Carl & Anela Driller

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the appropriate district orfice of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1(a) and Section 5 need be completed.

Quality BRINE Box 25, TAtum, NM. 505-398-3490



FL-5

24-Hour Service Call Phones: 398-3490 398-3464

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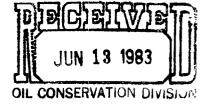


Box 75

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Vacuum Trucks Brine Water Fresh Water Mud Oil Transport Trucks Oil Reclaiming

June 9,1983



SANTA FE

Joe D. Ramey Oil Conservation Division P.O. Box 2088 State Land Office Building Santa Fe, NM 87501

Dear Mr. Ramey,

I hope you will find the following report to be complete. Please cnntact me if I have overlooked any portion listed in the WQCC regulations.

It is our request to obtain verbal permission to operate our new facility.. As with any oilfield project, we are eager to begin service to our area.

Sincerely 52

Stan Watson Watson Treating Plant, Inc.

Quality Brine Tatum N. Nex.

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mex. to monitor my onerator of qualit 5 William give my consent for the prine watson well #1 of tatum n. flesh water sugnly well.

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Quality Brine Tatum N. Mex.

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Quality Brine Tatum N. Mex.

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Quality Brine Tatum N. Mex.

I <u>HileN J. BENSON</u> give my consent for the onerator of quality bline watson well #1 of tatum n. mex. to monitor my fresh water sumply well.

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Quality Brine Tutum N. Mex.

I \_\_\_\_\_ Gano give my consent for the onerator of quality brine watson well #1.of tatum n. mex. to monitor my fresh water sunnly well.

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NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION SANTA FE, NEW MEXICO

. RECEIVED JUL 29 1983 EID: WATER POLLUTION CONTROL

Maxin

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-5803.

QUALITY BRINE, Box 75, Tatum, New Mexico 88267, telephone (505) 398-3490, Donny Watson, requests approval of their discharge plan for their brine in situ extraction well (brine supply well) and facility located in Section 20, Township 12 South, Range 36 East, Lea County, New Mexico. Quality Brine injects water down their injection well to an underlying salt formation that is approximately 2300 feet deep. The injected water dissolves the salt, forms a brine water solution with a total dissolved solids content of approximately 300,000 mg/L and weighs approximately 10 pounds per gallon. Quality Brine extracts and sells the brine water solution to various companies for use in oil and gas production.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1983.

STATE OF NEW MEXICO

OAL CONSERVATION DIVISION vien JOE D. RAMEY Director

SEAL









11-6-91 Quality Brine-Tatum New Mexizo Old tank storing tank bottoms with spilled oil on ground surface.

K. Brown



11-6-91 Quality Brine - Tatum NM " 20 94 500 Diesel the tank with inadequate containment below values.

K. From



Quality Brhe-Tatum NM с 7-м м м гр 94 гст. Diesel Fuel tank with inadequate containment. Fuel on ground surface from large loading value.

11-6-91



11-6-91 Quality Brine-Tatum NM

Containment under 2 tanks storing workaver fluids.





11-6-91 T THERE IN STATES Quality Brine - Tation NM Containment under 2 tank values storing workover fluids



11-6-91 Quality Brne - Tatum "NM Brine loading area with containment under loading hose.

K Brown



Quality Brine, Tatum NM Brine loading area with containing

K. Brown



Quality Brine

3/14/90

I



Quality Brene 3/14/90



Quality Brine

3/14/90

REPORT OF: QUALITY BRINE TATUM, N.M.

J

Quality Brine P.O. Box 75 Tatum, N.M. 88267 505-398-3490

#### WATER QUALITY CONTROL COMMISSION REGULATIONS

QUALITY BRINE, WATSON #1 Tatum, NM 88267

#### Part 3

- The quantity, quality, and flow characteristics of the discharge fluid at this site are as follows: We will be producing 10 lb. brine by means of injecting fresh water down the casing and producing through the tubing into two-1000 barrell storage tanks. To be sold upon demand but not to exceed state regulations.
- 2. There are no other discharge wells within one mile of our locations, however there are six water wells (see sample on page 2 ).
- 3. Depth of fresh water is shown insample page 3. TDS concentration of the ground water in the Tatum NM area will average 124 ppm according to the State Engineer office and USGS. Our report does include TDS from water wells in the immediate area. Pages/0-1%
- 4. Flood potential of the site and the Tatum area has been alleviated by a dam in eight mile draw northwest of Tatum.
- 5. Sampling and measurement of calculation of flow is made available by a three inch meter at the fresh water well and four inch meters attached at the brine station loading header.
- 6. Depth to and lithological description of rock at the base of the alluvium below our discharge site can be seen in sample on page 3.

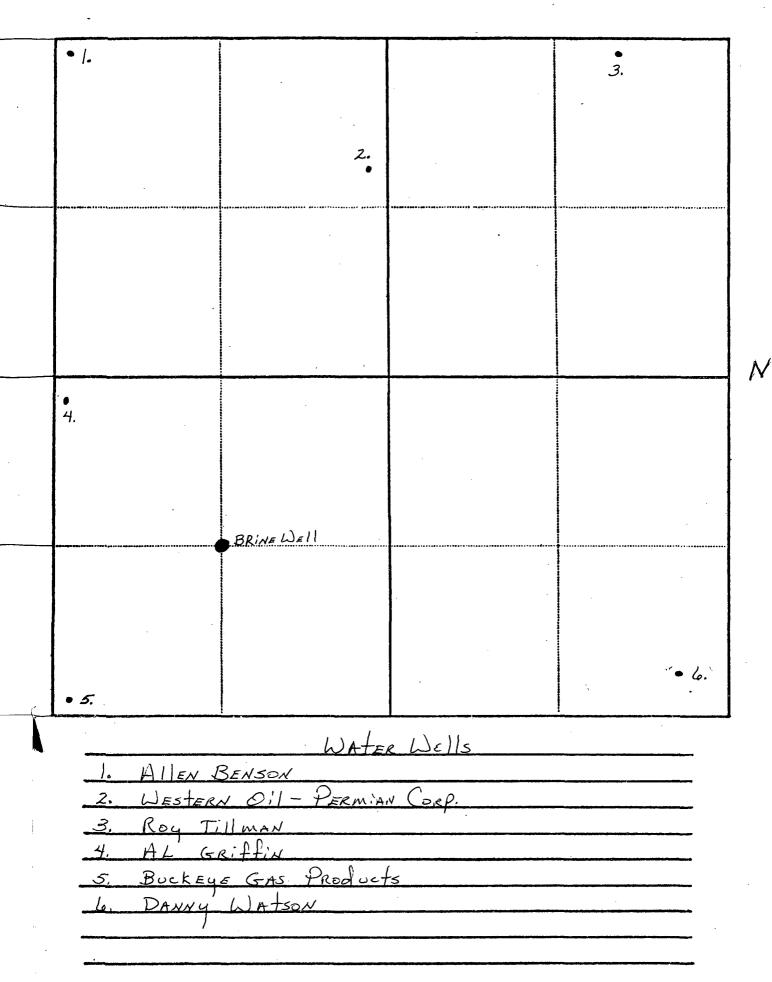
#### Part 5

Plugging and abandoment are shown on page 9

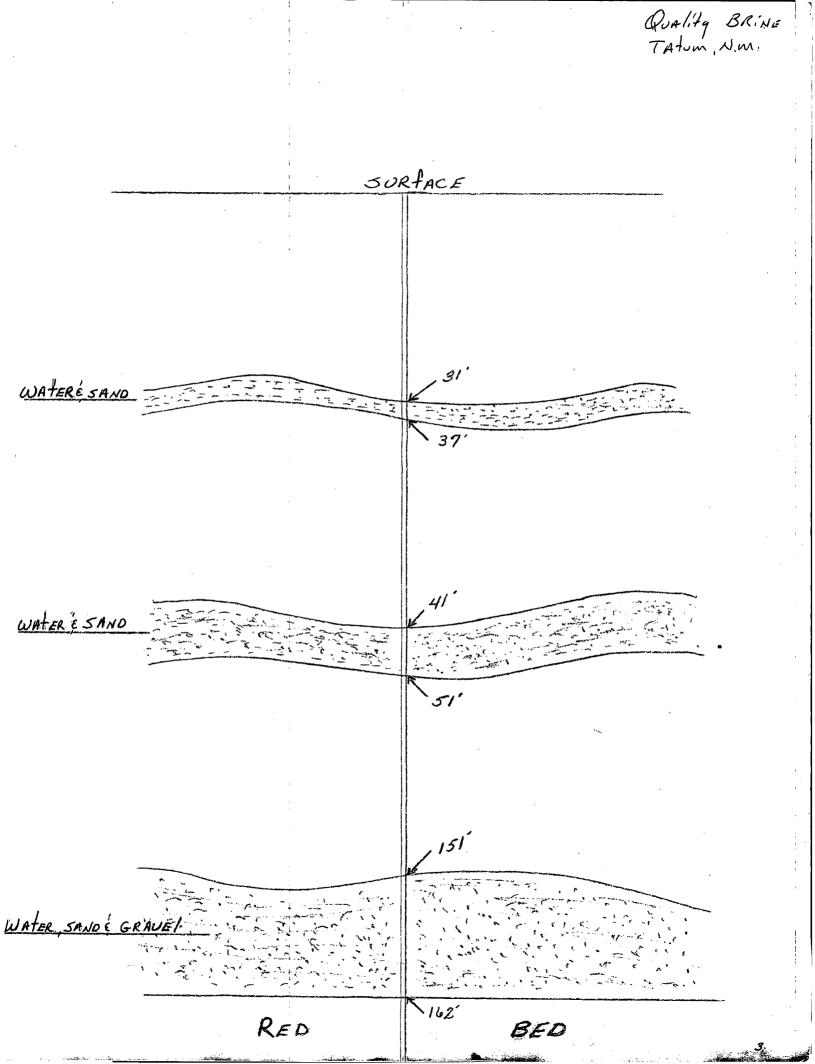
Quality BRINE TAtum, N.M.

**Z**.

Sec. 20 Township No. 12 of Range No. 36



FL-5

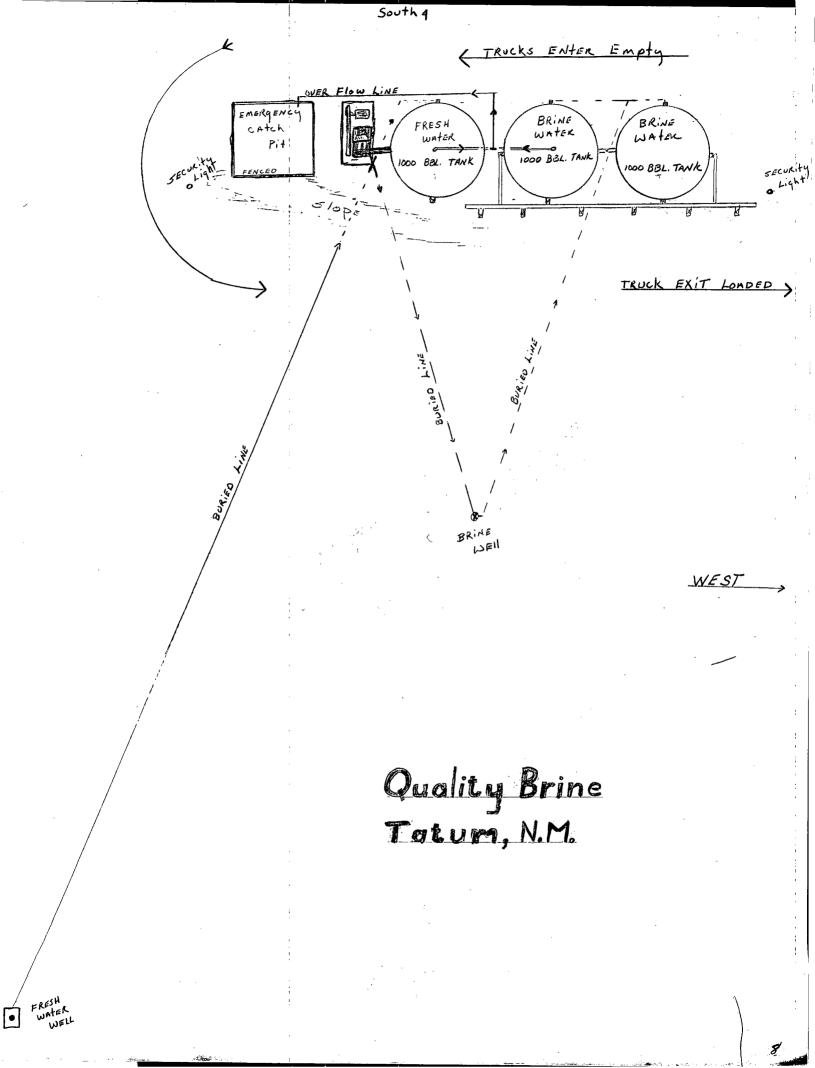


UATE OPERATOR 6-1-83 Quality Brine-Tatum.N.M. LOCATION WELL No. LEASE S20-T12-R36 Watson 1 7777 Circulate 50 sx "C" 470 CACIZ CEMENT. 53 Ft. 15\* 8 5/8 CS9 Jon N? Fort  $5\frac{1}{2}$  " casing set at 2255 ! with 250 sx of  $Lite^{c}$  cement Hole size 778 " Open hole from <u>2249</u> to <u>2905</u> Hole size <u>434</u> Total Depth 29051

5 1/2 Csg. 2 1/8 EUE N80 (76g. 94 J+s. + 2 sub & B.P. W/4 slot Λ Botton 51/2 Csq. 2250 2260 AN hyd. & RED BED 2290 Proposed injection is down the casing with fresh water, produce 10# brine out the tbg. SALT SALT Anhyd. Stringer 2767 2770 ZZ ZZZ SALT SALT Anhyd Stringer 2790 SALT SALT 43/4 OPEN Hole 3 Que Xon 2870 2912 Solid Anhy

WESTE	RN PETROLEUM	DATE 4-14-83	DISTRI	ст.Ł' SI	35		F.R.# 15	81271	
1	SERVICES	OPENATOR BEE W						· ·	
{		WELL NAME & NUMBE	R					•	
CEME	NTING REPORT			CK OR NSHIP			RVEY OR NGE		
ł		COUNTY LEA	ST		1.		• ••••••••		
l		TYPE JOB CONDUCTOR							
<u> </u>				53'					
TBG/DP: Siz	e Weigh	t Disp		Conducto	r Surfa	ce int.	Prod.	Liner	
Perforated In	terval		Size	85/8"				· · · · · · · · · · · · · · · · · · ·	
Pkr. Type	Set at _	· · · · · · · · · · · · · · · · · · ·	Weight	24#				· · · · · · · · · · · · · · · · · · ·	
Open Hole Si	ze Forn	nation	Thread	8ED					
Stage Collar	Гуре	_Set at	Capacity	3.3BB	4				
Estimated Wa	ash Out %	:	<u> </u>						
<u>Sacks</u> or Bbls.	Composition of	Cement and Spacer	Gals/sk H20	Weight Ľb/Gal	Yield Ft 3	Pump Time Hours	TOTAL Cu. Ft.	TOTAL Bbls.	
50	"C"-+ 4º70 CACI	2	6.3	14.8	1.32		66	11.7	
120	"C" NEAT		6.3	14.8	1.32		158	28	
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Total Mix H <sub>2</sub>	0 <u>25.5</u> Bbls	. Total Displacement $2.5$	Bbls, Type	WATERTO	tal Produ	icts <u>28</u>	Bbls	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
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	marks		austroje,		Tubing	Pro	Ca	sing	
12:50 6	BBL HO TO BRE	AK CIRCULATION 505×C+4% CAC		Rate 53	Tubing	Pro	Ca 150	2	
12:50 C 12:54 ST	ART CENENT (	50 5x C +4% CnC	12) /	.5	Tubing	Pre	Ca	2	
12:50 C 12:54 ST	BBL H20 TO BRE ART CENENT ( OP CENENT CENENT CIRCI		12) /	.5	Tubing	Pro	Ca 150	2	
12:50 C 12:54 ST 1:02 ST	BBL H20 TO BRE ART CENENT ( OP CENENT CENENT CIRCI FELL BACK M	505x°C+4% CAC	12) / CE,	.5	Tubing	Pre	Ca 150	2	
12:50 C 12:54 ST 1:02 ST	BBL H20 TO BRE ART CENENT ( OP CENENT CENENT CIRCI FELL BACK M	505XC"+4%CAC ILATED TO SURFA INUTES LATER .	12) / CE,	.5	Tubing	Pre	Ca 150	2	
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12:50 C 17:54 ST 1.02 ST 1.02 ST 3:23 ST 3:40 ST 3:54 ST 3:54 ST 3:57 S 	ART CENENT CENENT CIRCU FELL BACK M NPED 3.5 BBL H ART H20 TO BR ART CENENT I OP CENENT I TO IZ' FROM	505XC +490CAC JLATED TO SURFAU INUTES LATER . 120 TO CLEAR CSG EAK CIRCULATION 205XC "WEAT DISPLACE CEMENT BOTTOM (2.5 BBL)	12) / CE, 1 1 1 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	. <u>5</u> .5-2,5 2 2			Ca 150 150 -	250 250 250 250 250 2 250	
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en Hole Si	ze F	ormation	Thread				Sid	
age Collar <sup>-</sup>	Гуре	Set at	Capacity			4	52.2	
timated Wa	ash Out%		Depth				2249	· ]
Sacks or Bbls,	Composition	of Cement and Spacer	Gals/sk	Weight	Yield	Pump Time	TOTAL	TOTAL
)50		911 C1+14/5K	H <sub>2</sub> 0 10,9	Lb/Gal	Ft 3	Hours 2:5	<b>Cu. Ft.</b>	89.01
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DATE OPERATOR 6-1-83 Quality Brine-Tatum, N.M. LOCATION S20-T12-R36 WELL No. LEASE Watson 17177 7777 10 SX SURFACE Plug ′..... 1 Star Mary Trains 100 Ft. Plug At Top of Red BEd. Dill Contra 100 Ft. Plug At Top of SAlt. Only of " casing set at \_\_\_\_' with \_\_\_\_sx of \_\_\_\_\_ cement Hole size \_\_\_\_" Open hole from \_\_\_\_' to \_\_\_\_' Hole size \_\_\_\_\_ Total Depth

## WATER ANALYSIS

Well Ownership: ALLEN BENSON	Well, No
Land Status: State Federal	Fee X
Well Location: Unit Letter, Section,	TS, RE
Type Well:	Depthfeet.
Well Use: Domestic	
	ate Taken: <u>4-21-83</u> aken By: <u>Eddie Seay</u>
Specific Conductance:m/_	
Total dissolved Solids: PPM	•
Chlorides: 99.4 PPM	•
Sulfates: PPM	
Ortho-phosphates: V.Low Low [	MediumHigh
Sulfides: None Low (	]Medium 🗌 High
Date Analyzed: 4-25-83 By: 201. 0il Con	servation Division
REMARKS:25 ml 142.x .7 = 99.4 ppm	· · · · · · · · · · · · · · · · · · ·
Water well located 100 yards SW of Watson brine we	ell (approx.)
	·

## WATER ANALYSIS

Well Ownership:WESTERN OIL	Well No
Land Status: State Federal	Fee
Well Location: Unit Letter, Section	, TS, RE
Type Well:	Depthfeet.
Well Use: Domestic	
Sample Number:	Date Taken:4-21-83
	Taken By:Eddie Seay
Specific Conductance:	m/
Total dissolved Solids:	•
Chlorides:113.6	PPM.
Sulfates:	PPM.
Ortho-phosphates: V.Low DL	ow 🗌 Medium 🗌 High
Sulfides: None Le	ow 🗌 Medium 🗌 High
Date Analyzed: <u>4-25-83</u> By: <u>2</u>	21 Le Le Linition
REMARKS:	
25 ml 142 x .8 - 113.6 ppm	
Water well located approximately 75 yards wes	st of Watson brine well.
	-
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ENERGY AND MINERALS DEPARTM OIL CONSERVATION DIVISION HOBBS, NEW MEXICO		•	
WATER ANALYSIS	· · · ·	÷.,	
		· · ·	•
Well Ownership: MR. TILLMAN	Well No.		
Land Status: State Federal	Fee X	• •	•
Well Location: Unit Letter, Section	, TS, R	E	
Type Well: sub-pump water well	Depth	feet.	
Well Use: Domestic			
Comple Munkers	Data Takora	4-21-83	
Sample Number:	Date Taken:	Eddie Seay	
	Taken By:		
Specific Conductance:	m/~	•	
Total dissolved Solids:	PPM.		
Chlorides:71	PPM.		
Sulfates:	PPM.		
Ortho-phosphates: 🔲 V.Low 🗌 Low	Medium	High	
Sulfides: None Low	Medium 🗌	High	
Date Analyzed: $4-25-83$ By: $20$	Li U J. Conservation D	ivision	
REMARKS: 25 ml 142 x .5 = 71 ppm		· \	
Well located approx 100 yards NW of Watson br	ine well.		
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#### WATER ANALYSIS

Well Ownership: AL G	RIFFIN	Well No
Land Status: State	Federal	Fee
Well Location: Unit Le	tter, Section	, TS, RE
		Depthfeet.
Well Use: Domestic		
Sample Number:	<u></u>	Date Taken: <u>4-21-83</u> Taken By: <u>Eddie Seay</u>
Specific Conduc	tance:	•
	Solids:	· · ·
Chlorides:	113.6	PPM.
Sulfates:		PPM.
<b>O</b> rtho-phosphate	s: V.Low Low	/ 🗌 Medium 🔲 High
Sulfides:	None Low	Wedium 🗌 High
	-	
Date Analyzed:4-25-8	3 By: $\sum_{011}^{3}$	Conservation Division
REMARKS:		
25 ml 142 x .8 = 113.6	ppm chlorides	· ·
,		X
Water well located appr	oximately 75 yards SW (	of Watson brine well.
С <sup></sup> .		

# WATER ANALYSIS

Well Ownership:_	WATSON	. · · ·	Well No.	
Land Status: S	•	Federal	Fee X	· · · · · · · · · · · · · · · · · · ·
Well Location:	Unit Letter	, Section	20, T <u>12</u> , R	<u>36</u> E
<del></del>				
Type Well:s	ub-pump water w	ell	Depth	feet.
Well Use: b	rine supply wel	1	•	· · · · · · · · · · · · · · · · · · ·
Sample Number:			Date Taken:	4-21-83
			Taken By:	Eddie Seay
	Conductance:	<u></u>	m/~	•
	ssolved Solids:	· · · · · · · · · · · · · · · · · · ·	PPM.	
Chloride	S:	28.4	PPM.	
Sulfates	:	<u></u>	PPM.	
Ortho-ph	osphates: 🔲 V	.Low Low	🗌 Medium	🗌 High
Sulfides	: 🗌 N	one Low	Medium	🗌 High
Date Analyzed:	4-25-83	By: <u>21</u> 011	d. W Su Conservation	ivision
REMARKS: 2	5 ml 142 x .2 =	28.4 ppm		<b>\</b>
Water well locate	ed approximately	y 75 yards NE o	f brine well.	
			· · ·	
	1 	•		
Qual-107,				

1.4

## WATER ANALYSIS

and Status: Stat	e Fede	eralF	ee <u>x</u>	•
lell Location: Uni		•		E
· · · ·	:			
Sype Well: <u>Sub-Pu</u>	no Water Well		Depth	feet.
lell Use: <u>Domest</u>				
Sample Number:	1	Dat	e Taken:	4-21-83
		Tak	en By: Ell.	i le la
Specific Co	nductance:	m/_^_	• ••	
Total disso	lved Solids:	PPM.	•	
Chlorides:	18	4.6 PPM.	•	
Sulfates:		PPM.		
Ortho-phosp	hates: V.Low	Low	Medium [	]High
Sulfides:	None	Low	Medium [	High
	,, <b>*</b>	<b>19 </b>		
Date Analyzed: <u>4-</u> 2	28-83	By: Edd	1.1 · l.	
		_ اور بردی الافاد این کرداند. کان نظامی	rvation Divi	sion
EMARKS: 25ml. 1	142 X 1.3 - 184.	.6		
		<b></b>	<b></b>	1
WELL Lora	DO APPROX	100 ud. 5	E of WA	+301/
BRINE WELL	annan an a		,	
		<b></b>		
•	L.	*		

# NEW

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Form C+102 Supersedex C+128 Effective 1-1-65

Control         Control <t< th=""><th></th><th><b>.</b></th><th>All distance</th><th>es must be f</th><th>rom the outer boundars</th><th>en of the Section</th><th>3</th><th></th></t<>		<b>.</b>	All distance	es must be f	rom the outer boundars	en of the Section	3	
Tore that				1	Lease			Well tic.
M     20     12     SOUTH     36     LEA       Action Trends Location of reality     free tream the     SOUTH     free tream the     SUE       S13     free tream the     SOUTH     free tream the     SUE     free tream the     SUE       1     Outline the acreage     free tream the     SUE     free tream the     SUE     free tream the     Acree       2     Outline the acreage     dedicated to the well, outline each and identify the ownership there of thath as to working interest and royalty).     If more than one lease is dedicated to the well, outline each and identify the ownership there of thath as to working interest and royalty.       3     If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-proling, etc?       1     Yes     No     If answer is "yee," type of consolidation       H     answer is "non". That the owners and fact descriptions which have actually hern consolidated. (I se reverse side of this form for force-proling, etclestand on the class and conjust and tree downership is dedicated.       Variationale will be assigned to the well until all interests have hern consolidated the target of the class and conjust and tree downership is dedicated.       1     Aready of the assigned to the well well of the class of the class and conjust and tree downership is dedicated.       2     If a class of the class of the class of theclass of the class of the class of the class of the class		the second se		•			<u>ь —                                   </u>	1
				i I				
593       tree months       SOUTH       ine and       639       test term that       WEST       Deschard a constant         1. Outline the acreage dedicated to the subject well by colored pencil or hackure marks on the plat below.       2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).       3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners here consolidated to the well well is not consolidated. If se reverse side of this form if necessary.         If more the massing of the well until all interests have been consolidated (the communitization, antization, force-pooling, etc?       If more the massing of the well until all interests have been consolidated (the communitization, antization, force-pooling, etc?         If answer is "no." list the owners and tract descriptions which have actually heen consolidated (the communitization, antization, force-pooling, etc?         If answer is "no." list the owners and tract descriptions which have actually heen consolidated. If se reverse side of this form if necessary.         Vo allowable will be assigned to the well until all interests have been consolidated the communitization, antization, force-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.         CERTIFICATION         If the end correct is the solid configure to the set of ny heart provide and configure to the set of ny heart provide and the law of ny heart provide and the law of ny heart provide and the law of ny heart provide and theart of ny heart provide and the law of ny heart provide and thear			12 SOUTH		50 LASI			
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<ul> <li>to med herein is true and complete to the best of my knowledge and belief.</li> <li>B&amp;E Inc. &amp; Watson Treating Plant Inc.</li> <li>Plant Inc.</li> <li>Magent</li> <li>Control of the set of my knowledge and belief.</li> <li>Agent</li> <li>Control of the set of my knowledge and belief.</li> <li>I hereby certify that the well facation shown on this alar was platted from field not field and my supervision, and that the same is true and correct to the best of my knowledge and belief.</li> <li>Control of the set of my knowledge and belief.</li> <li>Control of the set of my knowledge and belief.</li> </ul>		1			1		1 have by	careful that the set
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shown on this plat 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.				•			2-24-83	·
639 CHA W. WEST Registered Professional Engineer and or Land Surveyor Chand Surveyor Chand Surveyor Certificate No		1 1 1 1 1 1 1 1 1		REG. PRO.			shown on notes of under my is true o	this plat was plotted from field actual surveys made by me or supervision, and that the same and correct to the best of my
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	P	tructural to	ration prof	P <sup>122</sup>	na ha	The second se	1/	