

1R - 289

GENERAL CORRESPONDENCE

YEAR(S):

3/2007 → 1997



1R 289

Matthew P. Hudson
Remediation Project
Manager

**Abandonment Business
Unit**

Chevron Environmental
Management Company
11111 S Wilcrest Dr
Room N2104A
Houston, TX 77009
Tel 281 561 3466
Fax 281 561 3841
http://www.chevron.com

March 6, 2007

RECEIVED

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 So. St. Francis Drive
Santa Fe, New Mexico 87505

MAR 07 2007

**Oil Conservation Division
Environmental Bureau**

**Subject: 2006 Annual Groundwater Monitoring Report
Cooper-Jal Unit South Injection Station, Lea County, New Mexico
OGRID No. 4323**

Dear Mr. Price:

Please find enclosed one copy of the above-referenced report. This report provides information and details on the groundwater monitoring activities completed by Conestoga-Rovers and Associates (CRA) during 2006.

Should you have any questions concerning this report or the on-going work, please call myself at (281) 561-3466 or Luke Markham with CRA at (432) 686-0086.

Sincerely,

Matthew P. Hudson

Enclosure

cc: Patricia Caperton, NMOCD (electronic copy)
Luke Markham, CRA (cover letter only)



1 R 289

RECEIVED

MAR 07 2007

Oil Conservation Division
Environmental Bureau

2006 ANNUAL GROUNDWATER MONITORING REPORT

COOPER-JAL UNIT SOUTH INJECTION STATION
OGRID NO. 4323

NW/4, NW/4, SE/4, SECTION 24, T-24-S, R-36-E

LATITUDE: N 32° 12' 7.3" LONGITUDE: W 103° 12' 59.9"

LEA COUNTY, NEW MEXICO

RECEIVED

MAY 03 2004

OIL CONSERVATION
DIVISION

April 27, 2004

Mr. William C. Olson, Hydrologist
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

1R-289

Re: Annual Groundwater Monitoring Report, Texaco Exploration and Production Inc., Cooper-Jal Unit Injection Station, NW/4, NW/4, SE/4, Section 24, Township 24 South, Range 36 East, Lea County, New Mexico

Dear Mr. Olson:

Please find enclosed a copy of Figure 10 for the above-referenced report. The figure was inadvertently omitted from the report.

Referring to Table 1 and Figure 3 of the report, the groundwater measurement for the shallow monitoring well MW-2A is questionable. The groundwater level in well MW-2A has been consistent since monitoring began in May 1998, and the groundwater flow direction in the shallow zone has been consistently toward the southeast. The groundwater level in well MW-2A will be verified during the next sampling event, scheduled for May 2004.

Please call Scott Toner at (432) 687-7318 or myself at (432) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, CPG
Project Manager

cc: Scott Toner - Texaco
Chris Williams - NMOCD District I

MW-13
1460

1000

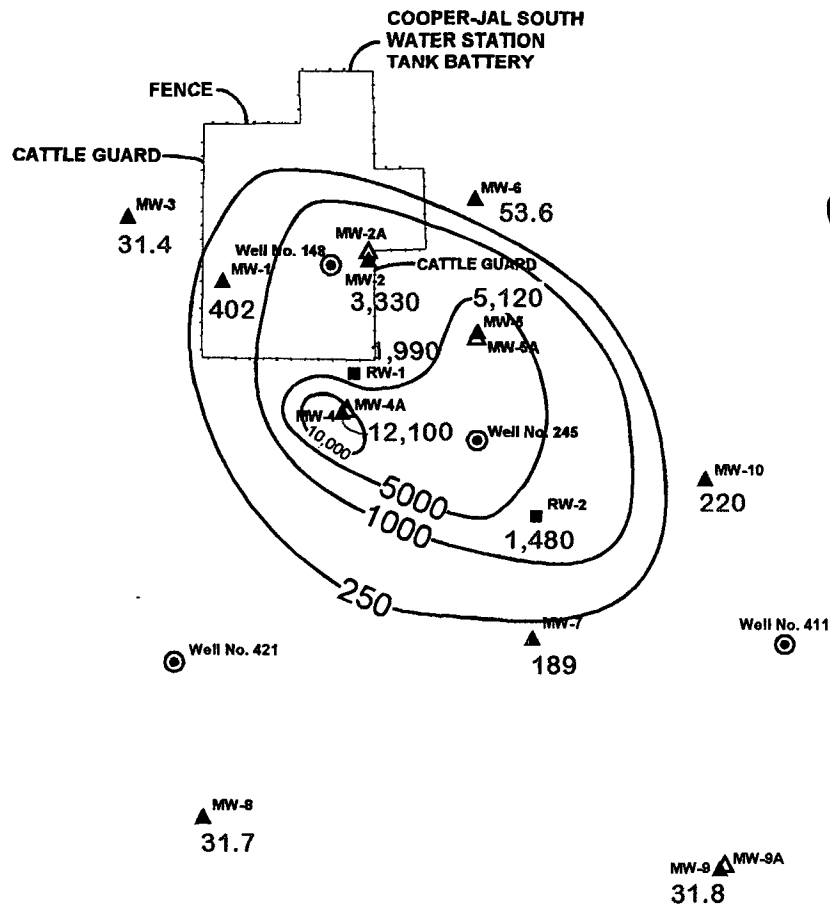
500

250

MW-12
93.1

WELL DATA

Well No.	Ground Elevation Feet, AMSL	Top of Casing Elevation Feet, AMSL
MW-1	3320.17	3320.00
MW-2	3319.86	3319.40
MW-2A	3319.86	3319.39
MW-3	3316.22	3318.21
MW-4	3317.64	3318.74
MW-4A	3317.47	3319.58
MW-5	3318.95	3321.10
MW-5A	3318.96	3321.07
MW-6	3319.13	3321.15
MW-7	3316.35	3318.39
MW-8	3314.85	3317.14
MW-9	3310.79	3312.78
MW-9A	3310.44	3312.56
MW-10	3317.28	3319.30
MW-11	3307.30	3308.69
MW-12	3325.51	3328.43
MW-13	3335.72	3336.49
RW-1	3317.40	3318.50
RW-2	3316.72	3318.62



LEGEND	
MW-2 3330	MONITORING WELL LOCATION (DEEP), and CHLORIDE CONCENTRATION IN GROUNDWATER (Mg/L) 11/25 AND 11/26/03
MW-2A	MONITORING WELL LOCATION (SHALLOW),
○	COOPER-JAL UNIT OIL WELL LOCATION
■	GROUNDWATER RECOVERY WELL LOCATION
—	CONTOUR OF CHLORIDE CONCENTRATION IN GROUNDWATER (Mg/L) 11/25 AND 11/26/0

0 50 100
SCALE



DATE: 4/1/04
DWN. BY:
FILE: 0-0113

FIGURE 10

LEA COUNTY, NEW MEXICO

TEXACO EXPLORATION and
PRODUCTION, INC.

COOPER-JAL SOUTH WATER STATION and
TANK BATTERY

NW/4, SE/4, SECTION 24, T24S, R36E

CHLORIDE ISOPLETH MAP (DEEP)
NOVEMBER 25-26, 2003

Larson &
Associates, Inc.
Environmental Consultants

RECEIVED

APR 20 2004

OIL CONSERVATION
DIVISION

April 15, 2004

Mr. William C. Olson, Hydrologist
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Annual Groundwater Monitoring Report, Texaco Exploration and
Production Inc., Cooper-Jal Unit Injection Station, NW/4, NW/4, SE/4,
Section 24, Township 24 South, Range 36 East, Lea County, New Mexico**

Dear Mr. Olson:

Please find enclosed a copy of the above-referenced report. The report is submitted on behalf of ChevronTexaco Exploration and Production, and presents the results of annual groundwater monitoring conducted by Larson and Associates, Inc. Please call Scott Toner at (432) 687-7318 or myself at (432) 687-0901 if you have questions.

Sincerely,
Larson and Associates, Inc.



Cindy K. Crain, CPG
Project Manager

cc: Scott Toner - Texaco
Chris Williams - NMOCD District I



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 1517	Date 9/11/04
---	-----------	--------------

Originating Party

Other Parties

Louis Thomas - Landowner
(520)-456-9235

Bill Olson - Envir. Bureau

SUBJECT

Texaco - Corps Tel Unit

Discussion

He requested to be placed on future mailing of
any OCD correspondence with Texaco.

Mail to: Louis Thomas
201 Edgewood
Huachuca City, AZ 85616

Conclusions or Agreements

Will place on mailing list for the site

Distribution

Signed

Will Olson

11289

Olson, William

From: Cindy Crain [cindy@laenvironmental.com]
Sent: Friday, November 21, 2003 3:24 PM
To: Bill Olson; Paul Sheeley
Cc: Scott Toner
Subject: Groundwater Monitoring at Texaco E&P Cooper-Jal Unit South Injection Station

Dear Mr. Olson and Mr. Sheeley:

Larson and Associates, Inc. will be conducting groundwater monitoring at the Texaco E&P Cooper-Jal Unit South Injection Station located in Unit Letter J (NW/4, NW/4, SE/4), Section 24, Township 24 South, Range 36 East, Lea County, New Mexico.

Activities are scheduled to begin on Monday, November 24, 2003. Please call me at (432) 687-0901 if you have any questions.

Sincerely,

Cindy Crain
Project Manager/Geologist
Larson and Associates, Inc.
507 N. Marienfeld, Suite 202
Midland, Texas 79702
office - (432)687-0901
mobile - (432)556-8665

2/3/2004

2001 JAN 12 AM 11:02

BEFORE THE NEW MEXICO STATE ENGINEER

IN THE MATTER OF THE APPLICATIONS BY)
TEXACO EXPLORATION AND PRODUCTION)
INC., FOR PERMITS TO DIVERT GROUND-)
WATER FROM THE LEA COUNTY AND CAPITAN)
UNDERGROUND WATER BASINS IN NEW MEXICO)

HEARING NO: 00-037
OFFICE OF THE
STATE ENGINEER
SANTA FE, NM
OSE FILE NO: L-11029 thru L-11031
& CP-884 thru CP-886

PRE-HEARING SCHEDULING ORDER

This matter came before the State Engineer's duly designated Hearing Examiner Louis D. O'Dell on December 7, 2000, at an administrative pre-hearing scheduling conference in Santa Fe, New Mexico. The Applicant, Texaco Exploration and Production, Inc., was represented by Joel T. Newton, Scott McKay, Esq., and Robert Patterson, Esq. The Protestants, Jim Cooper, Becky Jo Doom, Bill and Elena Grobe, George and Joyce Willis, Tom and Winnie Kennann, were represented by Michael Newell, Esq. The New Mexico Office of the State Engineer's Water Rights Division ("WRD") was represented by Ann Finley Wright, Esq.

This Pre-Hearing Order sets forth the issues that will be addressed at the administrative hearing and specifies deadlines by which the following items shall be completed: (a) identification of the names of the witnesses to be called by the parties, (b) filing reports and exhibits, (c) discovery, (d) filing of Pre-Hearing Motions and (e) the date of the hearing on the merits.

1. NATURE OF THE APPLICATIONS.

On October 1, 1999, the Applicant filed Application No. L-11,029 For Permit to Divert up to 3.0 acre-feet of shallow groundwater per year ("afy") from the Lea County Underground Water Basin in New Mexico and commence the use of ground water recovery Well No. 2 and numbered L-11,029 and located in the NE1/4 SE1/4 of section 24, Township ("T") 19 South ("S"), Range ("R") 36 East ("E"), N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. L-11,029 and disposed of in Applicant's disposal system.

On October 1, 1999, the Applicant filed Application No. L-11,030 For Permit to Divert up to 3.0 afy of shallow groundwater from the Lea County Underground Water Basin in New Mexico and

commence the use of existing ground water recovery Well No. 1, WRD File No. L-11,030 and located in the NW1/4 SE1/4 of Section 24, T19S, R36E, N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. L-11,030 and disposed of in Applicant's disposal system.

On October 1, 1999 the Applicant filed Application No. L-11,031 For Permit to Divert up to 3.0 afy of shallow groundwater from the Lea County Underground Water Basin in New Mexico and commence the use of groundwater recovery Well No. 3, WRD File No. L-11,031 and located in the NE1/4 SE1/4 of Section 24, T19S, R36E, N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. L-11,030 and disposed of in Applicant's disposal system.

On October 1, 1999 the Applicant filed Application No. CP-884 For Permit to Divert up to 32.5 afy of shallow groundwater from the Capitan Underground Water Basin in New Mexico and commence the use of groundwater recovery Well No. 2, WRD File No. CP-884 and located in the NW1/4 NW1/4 SE1/4 of Section 24, T24S, R36E, N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. CP-884 and disposed of in Applicant's disposal system.

On October 1, 1999 the Applicant filed Application No. CP-885 For Permit to Divert up to 32.5 afy of shallow groundwater from the Capitan Underground Water Basin in New Mexico and commence the use of groundwater recovery Well No. 2, WRD File No. CP-885 and located in the NW1/4 NW1/4 SE1/4 of Section 24, T24S, R36E, N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. CP-885 and disposed of in Applicant's disposal system.

On October 1, 1999 the Applicant filed Application No. CP-886 For Permit to Divert up to 6.5 afy of shallow groundwater from the Capitan Underground Water Basin in New Mexico and commence the use of groundwater recovery Well No. 1, WRD File No. CP-886 and located in the SW1/4 SE1/4 of Section 35, T24S, R37E, N.M.P.M., for environmental remediation purposes. Ground water will be recovered from Well No. CP-886 and disposed of in Applicant's disposal system.

The individuals listed above filed protests to the granting of the Applications.

2. JURISDICTION.

The jurisdiction of the State Engineer is invoked pursuant to NMSA 1978, Section 72-12-3 (1985).

3. STATEMENT OF THE ISSUES

- A. Whether granting the Applications would result in impairment to existing water rights.
- B. Whether granting the Applications would be detrimental to the public welfare of the state.
- C. Whether granting the Applications would be contrary to the conservation of water within the state.

4. DISCLOSURE OF WITNESSES AND EXHIBITS

Witness Identification: On or before **March 15, 2001** each party shall disclose to the others all expert and fact witnesses who may be called at the hearing of this matter. Disclosure shall be by witness lists that contain the name and address of each witness, an indication of whether the witness will be offered as an expert and a summary of anticipated testimony. The lists shall also be filed with the Hearings Unit by **March 15, 2001**.

Final Witness Identification: On or before **June 15, 2001** each party shall disclose to the others all final expert and fact witnesses who may be called at the hearing of this matter. Disclosure shall be by witness lists that contain the name and address of each final witness, an indication of whether the final witness will be offered as an expert and a summary of anticipated testimony. The lists shall also be filed with the Hearings Unit by **June 15, 2001**.

Exhibits: On or before **June 15, 2001**, each party shall disclose and exchange any and all exhibits and reports to be offered into evidence at the hearing. The exhibits shall be bound in an appropriate folder or binder, indexed and labeled for identification. The parties shall file the exhibits index with the Hearings Unit by **June 15, 2001**.

5. DISCLOSURE OF REBUTTAL WITNESSES AND EXHIBITS

All rebuttal witnesses are to be disclosed and rebuttal exhibits to be used at hearing are to be exchanged between the parties on or before **July 16, 2001**, in the same manner as set forth in Section 4, above. The rebuttal witness lists and exhibits indexes are to be filed with the Hearings Unit by **July 16, 2001**.

6. CLOSE OF DISCOVERY

The deadline for conclusion of discovery is **August 15, 2001**.

7. MOTIONS AND OBJECTIONS

The deadline for filing dispositive motions and written objections to a proposed witness or exhibit is **August 31, 2001**. Any exhibit not objected to in writing by **August 31, 2001**, shall be deemed admitted into evidence at the hearing.

8. FILING AND SERVICE

Filing of pleadings, exhibits and documents are to be made in triplicate (original and two copies) to the Hearings Unit, Office of the State Engineer, P.O. Box 25102, Santa Fe, New Mexico, 87504-5102. The physical location of the Hearings Unit office is at 607 Cerrillos Road, Suite E of the Peralta Complex on the corner of Cerrillos Road and Paseo de Peralta, Santa Fe, New Mexico. A copy of any pleading or other document submitted for filing must be served by the submitting party upon the other parties. Upon request, a file stamped copy of the submission will be returned to the submitting party if an extra (third) copy and a stamped, self-addressed envelope is provided with the submission. Service may be made upon the parties in accordance with the attached certificate of mailing unless otherwise notified per entry of appearance or other writing filed in this matter.

9. PRE-HEARING CONFERENCE

If the Hearing Examiner deems it necessary to address objections, outstanding motions or

other matters prior to hearing, a Pre-Hearing Administrative Conference will be scheduled on **October 9, 2001**. The parties will receive advance written notice of the scheduling.


10. HEARING

The hearing of this matter is scheduled to commence on **October 16, 2001** in Hobbs, New Mexico at a location to be announced. It is anticipated that the hearing will take no more than three days.

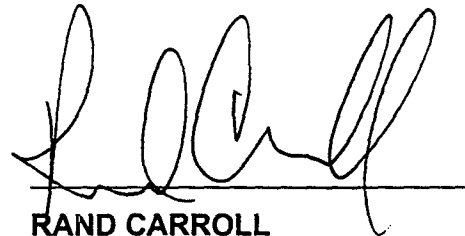
11. MODIFICATION

This Order shall control these proceedings, except that it may be modified with the consent of the parties and the Hearing Examiner or at the discretion of the Hearing Examiner for good cause shown.

IT IS SO ORDERED THIS 11TH DAY OF JANUARY 2001 .



LOUIS D. O'DELL
HEARING EXAMINER



RAND CARROLL
LEGAL ADVISOR

PARTIES ENTITLED TO NOTICE

HU # 00-037

I certify that a copy of the foregoing Pre-Hearing Scheduling Order was mailed to the following parties on the 12th day of January 2001.


F. Eileen Serna, Administrator

Water Rights Division

Ann Finley Wright, Esq.
Office of the New Mexico State Engineer
P. O. Box 25102
Santa Fe, New Mexico 87504-5102

APPLICANT

Joel T. Newton, Esq.
Miller, Stratvert & Torgerson, PA
P. O. Box 1986
Santa Fe, New Mexico 87504-1986

PROTESTANTS

Michael Newell, Esq.
Heidel, Samberson, Newell & Cox
P. O. Drawer 1599
Lovington, New Mexico 88260
(505) 3396-5303

(Attorney for Jim Cooper, Becky Jo Doom, Bill
and Elena Grove and George and Joyce Willis)

cc: William C. Olson, Hydrologist
Dept. of Energy & Minerals, OCD,EB
2040 South Pacheco Street
Santa Fe, New Mexico 87505

NOV 27 2000

MILLER, STRATVERT & TORGERSO, P.A.
LAW OFFICES

RANNE B. MILLER
ALAN C. TORGERSO
ALICE T. LORENZ
GREGORY W. CHASE
LYMAN G. SANDY
STEPHEN M. WILLIAMS
STEPHAN M. VIDMAR
ROBERT C. GUTIERREZ
SETH V. BINGHAM
JAMES B. COLLINS
TIMOTHY R. BRIGGS
RUDOLPH LUCERO
DEBORAH A. SOLOVE
GARY L. GORDON
LAWRENCE R. WHITE
SHARON P. GROSS
VIRGINIA ANDERMAN
MARTE D. LIGHTSTONE
J. SCOTT HALL
THOMAS R. MACK
TERRI L. SAUER
JOEL T. NEWTON
THOMAS M. DOMME

RUTH O. PREGENZER
JEFFREY E. JONES
MANUEL I. ARRIETA
ROBIN A. GOBLE
JAMES R. WOOD
DANA M. KYLE
KIRK R. ALLEN
RUTH FUESS
KYLE M. FINCH
H. BROOK LASKEY
KATHERINE W. HALL
FRED SCHILLER
PAULA G. MAYNES
MICHAEL C. ROSS
CARLA PRANDO
KATHERINE N. BLACKETT
JENNIFER L. STONE
ANDREW M. SANCHEZ
M. DYLAN O'REILLY
AMINA QUARGNALI-LINSLEY
BEATE BOUDRO
JENNIFER D. HALL

COUNSEL

PAUL W. ROBINSON
ROSS B. PERKAL
JAMES J. WIDLAND
BRADLEY D. TEPPER
GARY RISLEY

OF COUNSEL
WILLIAM K. STRATVERT
RALPH WM. RICHARDS

ALBUQUERQUE, NM

500 MARQUETTE N.W., SUITE 1100
POST OFFICE BOX 25687
ALBUQUERQUE, NM 87125-0687
TELEPHONE: (505) 842-1950
(800) 424-7585
FACSIMILE: (505) 243-4408

FARMINGTON, NM

300 WEST ARRINGTON, SUITE 300
POST OFFICE BOX 869
FARMINGTON, NM 87499-0869
TELEPHONE: (505) 326-4521
FACSIMILE: (505) 325-5474

SANTA FE, NM

150 WASHINGTON AVE., SUITE 300
POST OFFICE BOX 1986
SANTA FE, NM 87504-1986
TELEPHONE: (505) 989-9614
FACSIMILE: (505) 989-9857

LAS CRUCES, NM

500 S. MAIN ST., SUITE 800
POST OFFICE BOX 1209
LAS CRUCES, NM 88004-1209
TELEPHONE: (505) 523-2481
FACSIMILE: (505) 526-2215

PLEASE REPLY TO LAS CRUCES

November 20, 2000

Mr. Roger Anderson
Environmental Bureau Chief
2040 South Pacheco Street
Santa Fe, NM 87505

Re: OSE Applications of Texaco, L-11029 through L-11031
And CP-884 through CP-886

Dear Mr. Anderson:

Please find enclosed a copy of a letter drafted by William C. Olsen, a hydrologist with the Environmental Bureau, with respect to the above-referenced matter. Please be advised that an administrative hearing will take place with respect to the applications by Texaco to appropriate groundwater, and that, as you will note from the attached request for hearing filed by the Office of the State Engineer ("OSE"), the OCD has been asked to appear and testify with respect to the groundwater remediation projects at Texaco oil and gas production sites which are under the oversight of OCD pursuant to the New Mexico Oil and Gas Act. At such time as an evidentiary hearing is scheduled in this matter, we will be asking for someone from your office to appear and testify as to OCD requirements of Texaco as they relate to these pending applications.

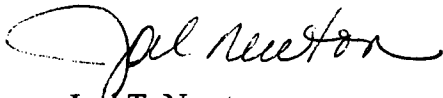
At the present time, there is a pre-hearing scheduling conference scheduled for December 7, 2000; however, that is not an evidentiary hearing at which we would anticipate the OCD appearing to testify. You are certainly welcomed to observe and monitor, but I do not anticipate that your testimony will be necessary. I would expect that an evidentiary hearing will be set some time within the six-month period after the pre-hearing scheduling conference. This letter is simply to notify you of the possibility that testimony may be required from someone in your office. That testimony may be required in the form of both deposition and by hearing appearance. Naturally, we will be in touch well prior to any date we might request your agency's testimony.

Roger Anderson
October 20, 2000
Page Two

If you have further questions or would like to speak with me about this matter, please do not hesitate to contact me.

Sincerely,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "Joel Newton".

Joel T. Newton

JTN/smg
Enclosures

cc: Scott McCay, Esq.
Scott Hall, Esq.
Marte Lightstone, Esq.

MILLER, STRATVERT & TORGERSON, P.A.
LAW OFFICES

RANNE B. MILLER
ALAN C. TORGERSON
ALICE T. LORENZ
GREGORY W. CHASE
LYMAN G. SANDY
STEPHEN M. WILLIAMS
STEPHAN M. VIDMAR
ROBERT C. GUTIERREZ
SETH V. BINGHAM
JAMES B. COLLINS
TIMOTHY R. BRIGGS
RUDOLPH LUCERO
DEBORAH A. SOLOVE
GARY L. GORDON
LAWRENCE R. WHITE
SHARON P. GROSS
VIRGINIA ANDERMAN
MARTE D. LIGHTSTONE
J. SCOTT HALL
THOMAS R. MACK
TERRI L. SAUER
JOEL T. NEWTON
THOMAS M. DOMME

RUTH O. PREGENZER
JEFFREY E. JONES
MANUEL I. ARRIETA
ROBIN A. GOBLE
JAMES R. WOOD
DANA M. KYLE
KIRK R. ALLEN
RUTH FUESS
KYLE M. FINCH
H. BROOK LASKEY
KATHERINE W. HALL
FRED SCHILLER
PAULA G. MAYNES
MICHAEL C. ROSS
CARLA PRANDO
KATHERINE N. BLACKETT
JENNIFER L. STONE
ANDREW M. SANCHEZ
M. DYLAN O'REILLY
AMINA QUARGNALI-LINSLEY
BEATE BOUDRO
JENNIFER D. HALL

COUNSEL

PAUL W. ROBINSON
ROSS B. PERKAL
JAMES J. WIDLAND
BRADLEY D. TEPPER
GARY RISLEY

OF COUNSEL

WILLIAM K. STRATVERT
RALPH WM. RICHARDS

ALBUQUERQUE, NM

500 MARQUETTE N.W., SUITE 1100
POST OFFICE BOX 25687
ALBUQUERQUE, NM 87125-0687
TELEPHONE: (505) 842-1950
(800) 424-7585
FACSIMILE: (505) 243-4408

FARMINGTON, NM

300 WEST ARRINGTON, SUITE 300
POST OFFICE BOX 869
FARMINGTON, NM 87499-0869
TELEPHONE: (505) 326-4521
FACSIMILE: (505) 325-5474

SANTA FE, NM

150 WASHINGTON AVE., SUITE 300
POST OFFICE BOX 1986
SANTA FE, NM 87504-1986
TELEPHONE: (505) 989-9614
FACSIMILE: (505) 989-9857

LAS CRUCES, NM

500 S. MAIN ST., SUITE 800
POST OFFICE BOX 1209
LAS CRUCES, NM 88004-1209
TELEPHONE: (505) 523-2481
FACSIMILE: (505) 526-2215

PLEASE REPLY TO SANTA FE

September 26, 2000

Mr. Scott McCay
Texaco Exploration and Production Company, Inc.
1111 Bagby Street # 2700
Houston, Texas 77022

Re: New Mexico State Engineer Applications

Dear Scott:

I received the attached from NMOCD counsel today.

Yours Very Truly,

MILLER, STRATVERT & TORGERSON, P.A.

J. Scott Hall

J. Scott Hall

JSH/ao

Enclosure(s) - as stated

cc: Marte Lightstone
Joel Newton

4235/25660/letters/McCay ltr.doc

SEP-26-00 TUE 04:54 PM



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Sallsbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 14, 2000

Ms. Ann Finley Wright
Office of the State Engineer
P.O. Box 25102
Santa Fe, New Mexico 87504-5102


**RE: OSE APPLICATIONS OF TEXACO, L-11029 THROUGH L-11031 AND CP-884
THROUGH CP-886**

Dear Ms. Finley Wright:

The New Mexico Oil Conservation Division (OCD) is in receipt of the Office of the State Engineer's (OSE) August 7, 2000 correspondence titled "APPLICATIONS OF TEXACO, L-11029 THROUGH L-11031 AND CP-884 THROUGH CP-886" and September 6, 2000 "NOTICE OF PRE-HEARING SCHEDULING CONFERENCE". These documents set a September 27, 2000 pre-hearing scheduling conference on the above-referenced OSE applications and suggests that the OCD should be asked to participate in the matter in order to make clear what OCD is requiring Texaco to do in regards to these applications. On September 7, 2000, you verbally requested that I send a letter to the OSE as to whether I would be able to attend the pre-hearing scheduling conference and possibly testify at the OSE hearings.

I have prior business obligations on September 27, 2000 and will not be able to attend the pre-hearing scheduling conference. The referenced applications involve ground water remediation projects at oil and gas production sites which are under the oversight of the OCD pursuant to the New Mexico Oil and Gas Act. If necessary, the OCD would be willing to testify in order to provide a record of the actions required by the OCD regarding ground water remediation at the sites. If the OSE desires that the OCD testify at the hearing, please send a written request to Roger Anderson, the Environmental Bureau Chief, at the below address. If you have any questions, please feel free to call me at (505) 827-7154.

Sincerely,


William C. Olson
Hydrologist
Environmental Bureau

xc: Roger Anderson, Environmental Bureau Chief
Chris Williams, OCD Hobbs District Supervisor

BEFORE THE NEW MEXICO STATE ENGINEER

OFFICE OF THE
STATE ENGINEER
HEARINGS UNIT
SANTA FE, NM

IN THE MATTER OF THE APPLICATIONS) HEARING CASE NO. 00-037
BY TEXACO EXPLORATION AND PRO-)
DUCTION INC., FOR PERMIT TO DIVERT) OSE File Nos. L-11029 thru L-
UNDERGROUND WATERS OF THE LEA &) 11031 & CP-884 thru CP-886
CAPITAN UNDERGROUND WATER BASINS)

ORDER DISMISSING PROTESTANTS

THIS MATTER came before the State Engineer's duly appointed Hearing Examiner, Louis D. O'Dell, *sua sponte* upon the failure of Protestants Tom and Winnie Kennann to timely submit the required hearing fee. Having reviewed the hearing file the Hearing Examiner recommends the following Findings and Order:

FINDINGS

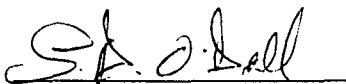
1. Notice of Pre-Hearing Scheduling Conference to be held on September 27, 2000 was mailed to Protestants Tom and Winnie Kennann at P.O. Box 186, Eunice, New Mexico 88321-0186 on September 6, 2000.
2. The Notice advised that a non-refundable hearing fee of \$25.00 must be submitted by the Applicant and each Protestant and received by the Hearings Unit on or before September 20, 2000 and that failure to make the fee payment when due would result in dismissal from the proceedings.
3. Office of State Engineer Rule 19 NMAC 25.2.17 provides that a \$25.00 hearing fee must be submitted at least five working days prior to the first scheduled pre-hearing conference.
4. September 20, 2000 is five working days prior to the scheduled pre-hearing conference.

5. The Notices of Pre-Hearing Scheduling Conference were not returned by the United States Postal Service as undeliverable.
6. Protestants Tom and Winnie Kennann failed to submit the required non-refundable hearing fee on or before September 20, 2000.

ORDER

NOW THEREFORE, IT IS HEREBY ORDERED that the protests of Tom and Winnie Kennann are dismissed and they shall no longer be a party to these proceedings.

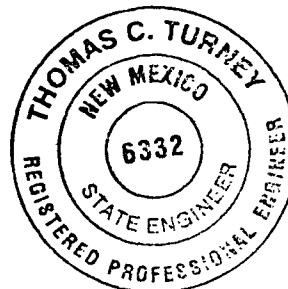
Respectfully submitted this 27th day of September 2000.



Louis D. O'Dell
Hearing Examiner

I ACCEPT AND ADOPT THE FINDINGS AND ORDER OF THE HEARING EXAMINER.
WITNESS MY HAND AND OFFICIAL SEAL THIS 28th DAY OF Sept 2000.

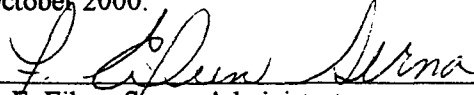

THOMAS C. TURNEY
NEW MEXICO STATE ENGINEER



PARTIES ENTITLED TO NOTICE

HU # 00-037

I certify that a copy of the foregoing Order Dismissing Protestants was mailed to the following parties on the 5th day of October 2000.


F. Eileen Serna, Administrator

Water Rights Division

Ann Finley Wright, Esq.
Office of the New Mexico State Engineer
P. O. Box 25102
Santa Fe, New Mexico 87504-5102

APPLICANT

Joel T. Newton, Esq.
Miller, Stratvert & Torgerson, PA
P. O. Box 1986
Santa Fe, New Mexico 87504-1986

PROTESTANTS

Jim Cooper
Box 55
Monument, NM 88265-0055
(505) 397-2045

Becky Jo Doom
HCR 68 Box 188
Jal, NM 88252
(505) 395-2877

Bill and Elena Grobe
P. O. Box QQ
Jal, NM 88252

George and Joyce Willis
Willis Ranch
P. O. Box 307
#1 Willis Road
Jal, NM 88252

Tom and Winnie Kennann
P. O. Box 186
Eunice, NM 88321-0186
(505) 394-2571 FAX (505) 394-2452

cc: William C. Olson, Hydrologist
Dept. of Energy & Minerals, OCD, EB
2040 South Pacheco Street
Santa Fe, New Mexico 87505

2000 SEP 22 AM 9:38

OFFICE OF THE
STATE ENGINEER
HEARINGS UNIT
SANTA FE, NM

BEFORE THE NEW MEXICO STATE ENGINEER

IN THE MATTER OF THE APPLICATIONS) HEARING CASE NO. 00-039
BY TEXACO EXPLORATION AND PRO-)
DUCTION INC., FOR PERMIT TO DIVERT) OSE File Nos. L-11029 thru L-
UNDERGROUND WATERS OF THE LEA) 11031 & CP-884 thru CP-886
CAPITAN UNDERGROUND WATER BASINS)

NOTICE RESCHEDULING PRE-HEARING CONFERENCE

THIS MATTER came before the State Engineer's duly appointed Hearing Examiner, Louis D. O'Dell, upon the Applicant's Motion For Continuance of Pre-Hearing Scheduling Conference filed on September 19, 2000. The majority of the parties in this matter do not oppose the Motion and the motion is well taken.

NOW THEREFORE, IT IS HEREBY ORDERED that the Pre-Hearing Scheduling Conference set for September 27, 2000 is hereby vacated and is rescheduled for December 7, 2000, in the Old Senate Chambers, 2nd Floor, Room 238, Bataan Memorial Building, at 407 Galisteo Street, Santa Fe, New Mexico, at 10:00 a.m.

IT IS SO ORDERED THIS 22ND DAY OF SEPTEMBER 2000.

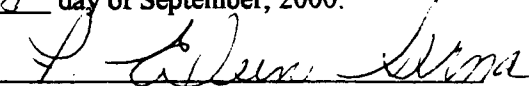


**Louis D. O'Dell
Hearing Examiner**

PARTIES ENTITLED TO NOTICE

HU # 00-037

I certify that a copy of the foregoing Notice Rescheduling Pre-Hearing Conference was mailed to the following parties on the 22nd day of September, 2000.


F. Eileen Serna, Administrator

Water Rights Division

Ann Finley Wright, Esq.
Office of the New Mexico State Engineer
P. O. Box 25102
Santa Fe, New Mexico 87504-5102

APPLICANT

Joel T. Newton, Esq.
Miller, Stratvert & Torgerson, PA
P. O. Box 1986
Santa Fe, New Mexico 87504-1986

PROTESTANTS

Jim Cooper
Box 55
Monument, NM 88265-0055
(505) 397-2045

Becky Jo Doom
HCR 68 Box 188
Jal, NM 88252
(505) 395-2877

Bill and Elena Grobe
P. O. Box QQ
Jal, NM 88252

George and Joyce Willis
Willis Ranch
P. O. Box 307
#1 Willis Road
Jal, NM 88252

Tom and Winnie Kennann
P. O. Box 186
Eunice, NM 88321-0186
(505) 394-2571 FAX (505) 394-2452

cc: William C. Olson, Hydrologist
Dept. of Energy & Minerals, OCD,EB
2040 South Pacheco Street
Santa Fe, New Mexico 87505

SEP 20 2000

MILLER, STRATVERT & TORGERSON, P.A.
LAW OFFICES

CONSERVATION DIVISION

RANNE B. MILLER
ALAN C. TORGERSON
ALICE T. LORENZ
GREGORY W. CHASE
LYMAN G. SANDY
STEPHEN M. WILLIAMS
STEPHAN M. VIDMAR
ROBERT C. GUTIERREZ
SETH V. BINGHAM
JAMES B. COLLINS
TIMOTHY R. BRIGGS
RUDOLPH LUCERO
DEBORAH A. SOLOVE
GARY L. GORDON
LAWRENCE R. WHITE
SHARON P. GROSS
VIRGINIA ANDERMAN
MARTE D. LIGHTSTONE
J. SCOTT HALL
THOMAS R. MACK
TERRIL SAUER
JOEL T. NEWTON
THOMAS M. DOMME

RUTH O. PREGENZER
JEFFREY E. JONES
MANUEL I. ARRIETA
ROBIN A. GOBLE
JAMES R. WOOD
DANA M. KYLE
KIRK R. ALLEN
RUTH FUESS
KYLE M. FINCH
H. BROOK LASKEY
KATHERINE W. HALL
FRED SCHILLER
PAULA G. MAYNES
MICHAEL C. ROSS
CARLA PRANDO
KATHERINE N. BLACKETT
JENNIFER L. STONE
ANDREW M. SANCHEZ
M. DYLAN O'REILLY
AMINA QUARGNALI-LINSLEY
BEATE BOUDRO
JENNIFER D. HALL

COUNSEL

PAUL W. ROBINSON
ROSS B. PERKAL
JAMES I. WIDLAND
BRADLEY D. TEPPER
GARY RISLEY

OF COUNSEL

WILLIAM K. STRATVERT
RALPH WM. RICHARDS

ALBUQUERQUE, NM

500 MARQUETTE N.W., SUITE 1100
POST OFFICE BOX 25687
ALBUQUERQUE, NM 87125-0687
TELEPHONE: (505) 842-1950
(800) 424-7585
FACSIMILE: (505) 243-4408

SANTA FE, NM

150 WASHINGTON AVE., SUITE 300
POST OFFICE BOX 1986
SANTA FE, NM 87504-1986
TELEPHONE: (505) 989-9614
FACSIMILE: (505) 989-9857

FARMINGTON, NM

300 WEST ARRINGTON, SUITE 300
POST OFFICE BOX 869
FARMINGTON, NM 87499-0869
TELEPHONE: (505) 326-4521
FACSIMILE: (505) 325-5474

LAS CRUCES, NM

500 S. MAIN ST., SUITE 800
POST OFFICE BOX 1209
LAS CRUCES, NM 88004-1209
TELEPHONE: (505) 523-2481
FACSIMILE: (505) 526-2215

PLEASE REPLY TO SANTA FE

September 19, 2000

Texaco Exploration and Production, Inc.
Attn: Mark J. Larsen, Senior Project Manager
Highlander Environmental Corporation
1910 North Big Spring
Midland, TX 79705

Ann Finley Wright, Esq.
Office of the State Engineer
P. O. Box 25102
Santa Fe, NM 87504-5102

Jim Cooper
Box 55
Monument, NM 88265

Becky Jo Doom
HCR 68 Box 188
Jal, NM 88252

William C. Olson, Hydrologist
Dept. of Energy & Minerals, OCD, EB
2040 South Pacheco Street
Santa Fe, New Mexico 87505

George and Joyce Willis
Willis Ranch
P.O. Box 307
#1 Willis Road
Jal, New Mexico 88252

Tom and Winnie Kennann
P.O. Box 186
Eunice, New Mexico 88321-0186

Bill and Elena Grobe
P.O. Box QQ
Jal, New Mexico 88152


Re: Applications of Texaco Exploration to Divert Underground waters
Hearing No. 00-037, OSE No. L-11029, *et seq.*

Ladies and Gentlemen:

Enclosed in the above-referenced matter is Applicant's Motion for Continuance of Pre-Hearing Scheduling Conference.

Sincerely,

MILLER, STRATVERT & TORGERSO, P.A.


Amanda Olsen, CLA
Paralegal

:ao

Enclosure(s) – as stated

BEFORE THE NEW MEXICO STATE ENGINEER

IN THE MATTER OF THE APPLICATIONS OF)
TEXACO EXPLORATION)
AND PRODUCTION INC. TO DIVERT THE)
UNDERGROUND WATERS OF THE LEA AND)
CAPITAN UNDERGROUND WATER BASINS,)
NEW MEXICO)

Hearing No. 00-037

OSE File No. L-11029,
L-11030, L-11031,
CP-884, CP-885,
CP-886

APPLICANT'S MOTION FOR CONTINUANCE OF PRE-HEARING
SCHEDULING CONFERENCE

COMES NOW the Applicant, Texaco Exploration and Production, Inc., by and through its counsel of record, Miller, Stratvert & Torgerson, P.A, and requests a continuance of that Pre-Hearing Scheduling Conference in this matter for the following reasons:

1. As stated in the Request for Pre-Hearing Scheduling Conference, filed by the Office of the State Engineer, Water Rights Division ("WRD"), this is a matter handling six (6) applications to divert water in two separate basins (3 applications as to the Lea Underground Basin and 3 applications as to the Capitan Underground Basin). These applications are sought to initiate a corrective action pursuant to a plan approved by the Environmental Bureau, New Mexico Department of Energy and Minerals, Oil Conservation Division ("OCD").

2. Counsel for the Applicant have only, days ago, been retained and received the file and, for the following reasons, would request a continuance until December 4, 6, 7 or 8, 2000, of that Pre-Hearing Scheduling Conference now set for September 27, 2000, at 2:00 p.m.:

A. As noted by WRD in its Request for Pre-Hearing Scheduling Conference, and in its cover letter, there are a number of important, novel issues implicated by the above-applications, requiring additional time for counsel to study the applications and prepare for the hearing, and, more important, for applicants, counsel and protestants to meet and confer prior to the Pre-Hearing Scheduling Conference.

B. Such additional time will permit applicant to investigate the claim by one protestant (Mr. Jim Cooper, protesting L-11029 and L-11031) that the legal descriptions utilized in the published notice for the Lea County applications were inaccurate, and, if so, to correct that issue in accordance with due process. Any earlier setting of the proposed Conference before this issue is resolved may render the Conference largely unfruitful, because discovery completion dates, witness list and exhibit list disclosure dates, and other related discovery and hearing dates cannot be set if the notice must be republished. Additionally, re-publication, if required, may generate additional protestants who will be entitled to attend any Pre-Hearing Scheduling Conference as well.

C. Additional time will permit due diligence to be conducted as to the proposal by WRD for the *amicus curiae* hydrologist and for participation by the OCD. While applicant generally favors the proposal regarding participation by OCD, the interwoven OCD issues are complex. Adequate prior preparation time is also needed for counsel to effectively address questions already posed by WRD in its Request for Pre-Hearing Scheduling Conference.

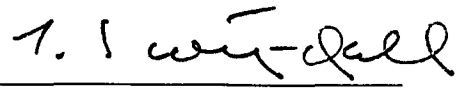
D. WRD has approved and concurred with the relief sought in this Motion, and, in fact, expresses preference for a hearing date on either December 6, 7, 8 or 4, 2000, in that order. Protestants Becky Jo Doom, Bill and Elena Grobe, and Tom and Winnie Kennan have concurred to the relief sought and have approved the dates suggested. Concurrence from Protestants Jim Cooper and George and Joyce Willis was sought on September 15, and again on September 19, 2000, through their indicated attorneys, Samberson & Newell, but no response has been received.

WHEREFORE, due to the foregoing reasons, Applicant respectfully requests a continuance until December 4, 6, 7 or 8, 2000, of that Pre-Hearing Scheduling Conference now

set for September 27, 2000, at 2:00 p.m., and for such other and further relief as the Hearing Examiner deems just and proper.

MILLER, STRATVERT & TORGERSON, P.A.

By:


Joel T. Newton
J. Scott Hall
Attorneys for Applicant

P. O. Box 1209
Las Cruces, New Mexico 88004
(505) 523-2481

P.O. Box 1986
Santa Fe, New Mexico 87504-1986
(505) 989-9614

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing Motion was mailed to the persons named below on September 19, 2000:

Texaco Exploration and Production, Inc.
Attn: Mark J. Larsen, Senior Project Manager
Highlander Environmental Corporation
1910 North Big Spring
Midland, TX 79705

Ann Finley Wright, Esq.
Office of the State Engineer
P. O. Box 25102
Santa Fe, NM 87504-5102

Jim Cooper
Box 55
Monument, NM 88265


Becky Jo Doom
HCR 68 Box 188
Jal, NM 88252

Bill and Elena Grobe
P. O. Box QQ
Jal, NM 88152

George and Joyce Willis
Willis Ranch
P. O. Box 307
#1 Wills Road
Jal, NM 88252

Tom and Winnie Kennann
P. O. Box 186
Eunice, NM 88321-0186

William C. Olson, Hydrologist
Dept. of Energy and Minerals, OCD, EB
2040 South Pacheco Street
Santa Fe, NM 87505



Joel T. Newton



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenberg
Director
Oil Conservation Division

September 14, 2000

Ms. Ann Finley Wright
Office of the State Engineer
P.O. Box 25102
Santa Fe, New Mexico 87504-5102


**RE: OSE APPLICATIONS OF TEXACO, L-11029 THROUGH L-11031 AND CP-884
THROUGH CP-886**

Dear Ms. Finley Wright:

The New Mexico Oil Conservation Division (OCD) is in receipt of the Office of the State Engineer's (OSE) August 7, 2000 correspondence titled "APPLICATIONS OF TEXACO, L-11029 THROUGH L-11031 AND CP-884 THROUGH CP-886" and September 6, 2000 "NOTICE OF PRE-HEARING SCHEDULING CONFERENCE". These documents set a September 27, 2000 pre-hearing scheduling conference on the above-referenced OSE applications and suggests that the OCD should be asked to participate in the matter in order to make clear what OCD is requiring Texaco to do in regards to these applications. On September 7, 2000, you verbally requested that I send a letter to the OSE as to whether I would be able to attend the pre-hearing scheduling conference and possibly testify at the OSE hearings.

I have prior business obligations on September 27, 2000 and will not be able to attend the pre-hearing scheduling conference. The referenced applications involve ground water remediation projects at oil and gas production sites which are under the oversight of the OCD pursuant to the New Mexico Oil and Gas Act. If necessary, the OCD would be willing to testify in order to provide a record of the actions required by the OCD regarding ground water remediation at the sites. If the OSE desires that the OCD testify at the hearing, please send a written request to Roger Anderson, the Environmental Bureau Chief, at the below address. If you have any questions, please feel free to call me at (505) 827-7154.

Sincerely,


William C. Olson
Hydrologist
Environmental Bureau

xc: Roger Anderson, Environmental Bureau Chief
Chris Williams, OCD Hobbs District Supervisor



2000 SEP -6 AM 10:43

OFFICE OF THE
STATE ENGINEER
HEARINGS UNIT
SANTA FE, NM

STATE OF NEW MEXICO

OFFICE OF THE STATE ENGINEER

IN THE MATTER OF THE APPLICATIONS OF)
TEXACO EXPLORATION AND PRODUCTION,)
INC. TO DIVERT THE UNDERGROUND WATERS)
OF THE LEA AND CAPITAN UNDERGROUND)
WATER BASINS, NEW MEXICO)

Hearing Unit No. 00-037

OSE File No. L-11029, L-11030,
L-11031, CP-884,
CP-885, CP-886

NOTICE OF PRE-HEARING SCHEDULING CONFERENCE

A pre-hearing scheduling conference in this case is set before Hearing Examiner Louis D. O'Dell as follows:

Date of Conference: September 27, 2000

Time of Conference: 2:00 p.m.

Place of Conference: **Old Senate Chambers (Room 238), 2nd Floor, Bataan Memorial Building, 407 Galisteo Street, Santa Fe, New Mexico.**

Applicant and each Protestant must submit a non-refundable hearing fee of \$25.00. The fee must be received by the Hearings Unit on or before the **20th day of September, 2000**. Check or money order should be made out to the New Mexico State Engineer and mailed to the Hearings Unit Administrator, Office of the State Engineer, P. O. Box 25102, Santa Fe, NM 87504-5102 or delivered in person to the Hearings Unit Office - Suite E of the Peralta Complex, 607 Cerrillos Road, Santa Fe. Failure to make the fee payment when due will result in dismissal from the proceedings or, in the case of the applicant, denial of the application. The parties should be prepared to clarify issues that are in dispute and to establish a schedule for proceeding to formal administrative hearing. A form of Pre-hearing Order is enclosed for your use in preparing for the conference as well as instructions concerning the hearing process.

OFFICE OF HEARING EXAMINER

By F. Eileen Serna
F. Eileen Serna
Administrator

I certify that a copy of this notice was mailed to all parties entitled to notice on the 6th day of September, 2000.

PARTIES ENTITLED TO NOTICE

HU # 00-037

Water Rights Division

Ann Finley Wright, Esq.
Office of the New Mexico State Engineer
P. O. Box 25102
Santa Fe, New Mexico 87504-5102

APPLICANT

Texaco Exploration and Production, Inc.
Attn: Mark J. Larsen, Senior Project Manager
Highlander Environmental Corporation
1910 North Big Spring
Midland Texas 79705
(915) 682-4559 FAX (915) 682-3946

PROTESTANTS

Jim Cooper
Box 55
Monument, NM 88265
(505) 397-2045

Becky Jo Doom
HCR 68 Box 188
Jal, NM 88252
(505) 395-2877

Bill and Elena Grobe
P. O. Box QQ
Jal, NM 88252

George and Joyce Willis
Willis Ranch
P. O. Box 307
#1 Willis Road
Jal, NM 88252

Tom and Winnie Kennann
P. O. Box 186
Eunice, NM 88321-0186
(505) 394-2571 FAX (505) 394-2452

William C. Olson, Hydrologist
Dept. of Energy and Minerals, OCD,EB
2040 South Pacheco Street
Santa Fe, NM 87505
(505) 827-7154

IN THE MATTER OF THE APPLICATION BY)

)

)

1

- D. Whether granting the application would be detrimental to the public welfare of the state.
- E. Whether granting the application would be contrary to the conservation of water within the state.

Other:

4. DISCLOSURE OF WITNESSES AND EXHIBITS

Witness Identification: On or before _____, each party shall disclose to the others all expert and fact witnesses who may be called at the hearing of this matter. Disclosure shall be by witness lists that contain the name and address of each witness, an indication of whether the witness will be offered as an expert, and a summary of anticipated testimony. The lists shall also be filed with the Hearings Unit by _____.

Exhibits: On or before _____, each party shall disclose and exchange any and all exhibits and reports to be offered into evidence at the hearing. The exhibits shall be indexed and labeled for identification. The parties shall file the exhibits index with the Hearings Unit by _____.

5. DISCLOSURE OF REBUTTAL WITNESSES AND EXHIBITS

All rebuttal witnesses are to be disclosed and rebuttal exhibits to be used at hearing are to be exchanged between the parties on or before _____ in the same manner as set forth in section 4, above. The rebuttal witness lists and exhibits index are to be filed with the Hearings Unit by _____.

6. CLOSE OF DISCOVERY

The deadline for conclusion of discovery is _____.

7. MOTIONS AND OBJECTIONS

The deadline for filing dispositive motions written objections to a proposed witness or exhibit is _____. Any exhibit not objected to in writing by _____ shall be deemed admitted into evidence at the hearing.

8. FILING AND SERVICE

Filing of pleadings, exhibits and documents are to be made in triplicate (original and two copies) to the Hearings Unit, Office of the State Engineer, P.O. Box 25102, Santa Fe,

New Mexico 87504-5102. The physical location of the Hearings Unit office is at 607 Cerrillos Road, Suite E of the Peralta Complex on the corner of Cerrillos Road and Paseo de Peralta, Santa Fe, New Mexico. A copy of any pleading, or other document submitted for filing must be served by the submitting party upon the other parties. Upon request, a file stamped copy of the submission will be returned to the submitting party if an extra (third) copy and a stamped, self addressed envelope is provided with the submission. Service may be made upon the parties in accordance with the attached certificate of mailing unless otherwise notified per entry of appearance or other writing filed in this matter.

9. PRE-HEARING CONFERENCE

If the Hearing Examiner deems it necessary to address objections, outstanding motions or other matters prior to hearing, a Pre-Hearing Administrative Conference will be scheduled on _____. The parties will receive advance written notice of the scheduling.

10. HEARING

The hearing of this matter is scheduled to commence at _____ in _____, New Mexico at a location to be later designated. It is anticipated that the hearing will take no more than _____ days.

11. MODIFICATION

This order shall control these proceedings, except that it may be modified upon the consent of the parties and the Hearing Examiners or at the discretion of the Hearing Examiners for good cause shown.

IT IS SO ORDERED this ____ day of _____ 2000.

Hearing Examiner

Hearing Examiner



STATE OF NEW MEXICO
OFFICE OF THE STATE ENGINEER

THOMAS C. TURNEY
State Engineer

ADMINISTRATIVE HEARINGS UNIT
607 CERILLOS ROAD, SUITE E
POST OFFICE BOX 25102
SANTA FE, NEW MEXICO 87504-5102
(505) 827-1430
FAX: (505) 827-3777

Instructions for Parties in State Engineer Administrative Hearings

Revised 05-01-00

An administrative hearing before the New Mexico State Engineer has been requested. In protested applications, State Engineer administrative hearings are multi-party proceedings, with the Applicant, the Protestant(s) and the Office of the State Engineer Administrative Litigation Unit (on behalf of the Water Rights Division staff) all appearing as parties. In aggrieved matters, the parties will be only the Applicant and the Administrative Litigation Unit.

These instructions apply to all matters in hearings before the State Engineer or his designated Hearing Examiner. Please read them carefully. ***Failure to comply with these instructions may result in the denial of the application or dismissal of the protest.***

1. Representation

An Applicant or Protestant may represent him or herself in the proceedings (called appearing pro se), but only an attorney licensed in the State of New Mexico may represent others. Exceptions may exist in the case of recognized acequias, municipalities or other corporate entities. Pursuant to law, the rules of evidence governing nonjury trials in our state district courts are generally followed in State Engineer administrative proceedings. If you decide to represent yourself, you will be responsible for familiarizing yourself with these rules, the Rules of Civil Procedure for the District Courts of New Mexico, and all other rules of the Office of the State Engineer. Appearing pro se does not relieve you of the obligations of following the rules regarding discovery or evidence.

2. Burden of Proof

The burden of proof in all administrative hearings before the State Engineer or his designated Hearing Examiner is on the Applicant. This means the Applicant must prove each element of his case by a preponderance of the evidence. While the Water Rights Division may appear through the Administrative Litigation Unit and may present an independent evaluation of the proposed matter, the burden of proof remains on the Applicant. Neither Applicant nor Protestant should rely on the Administrative Litigation Unit to present their case, and Applicants should not expect the Administrative Litigation Unit to meet the Applicant's burden of proof for them. Each party is responsible for presenting its own evidence. ***The failure of the Applicant to meet his burden of proof will result in denial of the application.***

3. **Appointment of a Hearing Examiner**

The State Engineer has appointed a Hearing Examiner to hear this case. The appointed Hearing Examiner has the power to regulate the proceedings and take whatever actions are necessary for the efficient and orderly conduct of the hearings, including setting dates for hearings, ruling on motions, swearing witnesses, issuing subpoenas, and limiting and receiving testimony and exhibits into evidence during the administrative hearing pursuant to the rules of evidence.

4. **Ex Parte Contacts**

There will be no ex parte contacts between any of the parties and the Hearing Examiner. Ex parte contacts are discussions or communications regarding a pending application when all parties are not present. The Hearing Examiner serves as an administrative judge and it is improper to contact him or her regarding your case without the other parties being present or notified. Thus, you may not contact the Hearing Examiner either in person, by telephone or by mail without all other parties being informed and present. All parties must receive copies of all correspondence between themselves and the Hearings Unit or the Hearing Examiner.

5. **Pre-Hearing Scheduling Conference**

The Pre-Hearing Scheduling Conference is a conference held (often by telephone) at which the Applicant, Protestants and the Administrative Litigation Unit of the State Engineer meet with the Hearing Examiner to set a date for the hearing, clarify the issues in dispute, and establish a discovery schedule. The possibilities of settlement or mediation as well as for an expedited hearing may also be explored. All parties will receive notice of the time, place and date of the Pre-Hearing Scheduling Conference, from the Hearings Unit, as well as the amount of and date your hearing fee payment must be submitted. ***Failure to appear at the Scheduling Conference or failure to submit the required hearing fee are sufficient grounds to dismiss you from the proceeding, or, if you are the Applicant, to deny the application.***

6. **Pre-Hearing Scheduling Order**

The Hearing Examiner will issue a Pre-Hearing Scheduling Order at or after the Pre-Hearing Scheduling Conference identifying the issues to be addressed, and setting dates for discovery, the date of the Pre-Hearing Administrative Conference, the date of the Administrative Hearing, and addressing any other matters the Hearing Examiner or parties deem appropriate. All parties are expected to meet and confer prior to the Conference to attempt to stipulate to the Pre-Hearing Scheduling Order. A form of the Order is enclosed

7. **Discovery**

The parties to the Administrative Hearing are permitted time to develop the evidence they wish to present at the hearing and to explore and ascertain the evidence of the other parties. While informal discovery by the parties is encouraged to reduce costs, parties may utilize all formal discovery methods, such as depositions or written interrogatories, and all parties are expected to comply with the rules of discovery as set out in the Rules of Civil Procedure for the District Courts of New Mexico.

8. **Instructions for Filing of Motions**

All Motions must be in writing and filed with the Hearings Unit. ***Copies of the Motion and attachments must be provided to all other parties by the party filing the Motion.*** The Request shall include:

- A. An affirmative statement in the Motion that the consent of other parties to the Motion was sought and not obtained or the reason such consent was not sought.
- B. If the Motion is unopposed by all parties, a proposed Order must also be submitted, affirmatively indicating the consent of the parties as to the motion.

Motions and Requests for Hearings not in compliance with this instruction will be disregarded.

Parties may respond to the Motion in writing within fifteen days of its receipt. The movant may reply within fifteen days thereafter. Copies of responses and replies must be provided to all parties. The Hearing Examiner may rule on a Motion based on the pleadings or schedule a hearing at his or her discretion. ***Failure to appear at any scheduled hearing may be grounds for denial of the application or dismissal of the protest.***

9. Pre-Hearing Administrative Conference

At some time shortly before the Administrative Hearing, the Hearing Examiner may schedule a Pre-Hearing Administrative Conference. The purpose of the conference is to have the parties stipulate to facts, agree to the admission of exhibits or otherwise seek rulings on exhibits and witnesses, to define and narrow the issues to be decided at the hearing so as to avoid duplicate, irrelevant or inadmissible testimony, and to issue a Pre-Hearing Order. The Hearing Examiner may take administrative notice of the relevant files on record at the Office of the State Engineer, however, the parties shall be responsible for introducing as exhibits those files that are relevant.

10. The Administrative Hearing

The Administrative Hearing is a formal proceeding at which the sworn testimony of witnesses is taken and exhibits are presented. All exhibits proposed to be admitted into evidence must be submitted in triplicate to the Hearings Unit. The hearing will be tape recorded, unless a party arranges for the hearing to be stenographically transcribed. That party is responsible for paying all costs associated with the stenographic transcription.

Generally, the Applicant presents its case first, followed by the Protestants. The Administrative Litigation Unit proceeds next. The Hearing Examiner may permit opening and closing statements, and may allow rebuttal. In all matters, the burden of proof is upon the Applicant and following the Applicant's case, either the Protestants or the Administrative Litigation Unit may move for dismissal on the grounds that the Applicant has failed to meet its burden of proof. The Rules of Evidence of the District Courts of New Mexico are generally followed, although the Hearing Examiner has the discretion to admit evidence that is not in strict conformity with those rules. At the conclusion of the Administrative Hearing, the Hearing Examiner may order post-hearing briefs or request proposed findings.

11. Recommendation of the Hearing Examiner and Decision of the State Engineer

After the Administrative Hearing, the Hearing Examiner makes a written report and recommendation to the State Engineer, generally within thirty days of the close of the Administrative Hearing or the receipt of post hearing briefs or proposed findings, whichever is latest. The State Engineer may adopt the findings in whole or in part, may reject the findings and enter his own, or may order that the hearing reconvene to take further evidence. The State Engineer's decision will be mailed to the parties or their attorneys.

12. Appeals from the State Engineer's Decision

Separate rules govern the filing of an appeal. Generally, any party dissatisfied with the decision of the State Engineer may appeal the decision to the district court of the county in which the appropriation or point of diversion is located. Appeals are made by serving a notice of appeal personally upon the State Engineer or his Administrative Secretary, the Attorney General, and all parties, within thirty days after receipt of the decision, filing timely proof of service with the district court and paying the court's docket fee.

IMPORTANT-READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM

2-69703
75.

APPLICATION FOR PERMIT

To Divert ~~Appropriate~~ the Underground Waters of the State of New Mexico

- Date Received 10-1-99 File No. L-11029
- Name of applicant Texaco Exploration and Production, Inc.
Mailing address P. O. Box 730
City and State Hobbs, NM 88240-0730
 - Source of water supply Shallow Water Aquifer, located in Lea County Basin
(artesian or shallow water aquifer) (name of underground basin)
 - The well is to be located in the NE 1/4 SE 1/4 Section 24 Township 19 South
Range 36 East N.M.P.M., or Tract No. _____ of Map No. _____ of the _____ District,
on land owned by State of New Mexico - Land Office
 - Description of well: name of driller RW-2, Scarborough Drilling, Inc., Lamesa, Texas;
Outside Diameter of casing 4" inches; Approximate depth to be drilled 70' feet;
 - Quantity of water to be appropriated and beneficially used 3.0 acre feet,
(consumptive use, diversion)
for Environmental Remediation purposes.
 - Acreage to be irrigated or place of use _____ acres.

Subdivision	Section	Township	Range	Acres	Owner

7. Additional statements or explanations Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

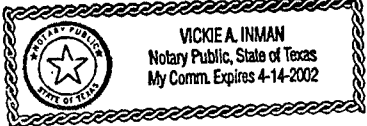
I, Mark J. Larson, affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

Texaco Exploration and Production, Inc., Permittee,

By: [Signature]

Subscribed and sworn to before me this 29th day of September, A.D., 19 99.

My commission expires 4-14-2002 [Signature]
Notary Public



T# 172268

ACTION OF STATE ENGINEER

100

By: _____

INSTRUCTIONS

Sec. 7.—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

IMPORTANT-READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM

APPLICATION FOR PERMIT

To ^{Divers} appropriate the Underground Waters of the State of New Mexico

- Date Received 10-1-99 File No. L- 11030
1. Name of applicant Texaco Exploration and Production, Inc.
Mailing address P. O. Box 730
City and State Hobbs, NM 88240-0730
2. Source of water supply Shallow Water Aquifer, located in Lea County Basin
(artesian or shallow water aquifer) (name of underground basin)
3. The well is to be located in the NE $\frac{1}{4}$ SE $\frac{1}{4}$ $\frac{1}{4}$, Section 24 Township 19 South
Range 36 East N.M.P.M., or Tract No. _____ of Map No. _____ of the _____ District,
on land owned by State of New Mexico - Land Office
4. Description of well: name of driller RW-1, Scarborough Drilling, Inc., Lamesa, Texas;
Outside Diameter of casing 4" inches; Approximate depth to be drilled 70' feet;
5. Quantity of water to be appropriated and beneficially used 45,25 3.0 acre feet,
(consumptive use, diversion)
for Environmental Remediation purposes.
6. Acreage to be irrigated or place of use _____ acres.

[illegible]

I, Mark J. Larson, affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

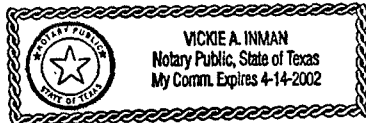
Texaco Exploration and Production, Inc.,

By: Mark Y. Chow

Subscribed and sworn to before me this 29th day of September, A.D., 1997.

My commission expires 4-14-2002 John A. Kamm

Notary Public



T# 172269

Number of this permit _____

ACTION OF STATE ENGINEER

After notice pursuant to statute and by authority vested in me, this application is approved provided it is not exercised to the detriment of any others having existing rights; further provided that all rules and regulations of the State Engineer pertaining to the drilling of _____ wells be complied with; and further subject to the following conditions: _____

Proof of completion of well shall be filed on or before _____, 19 _____

Proof of application of water to beneficial use shall be filed on or before _____, 19 _____

Witness my hand and seal this _____ day of _____, A.D., 19 _____

Thomas C. Turney, State Engineer

By: _____

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$25.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5—Irrigation use shall be stated in acre feet of water per acre per annum to be applied on the land. If for municipal or other purposes, state total quantity in acre feet to be used annually.

Sec. 6—Describe only the lands to be irrigated or where water will be used. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

IMPORTANT-READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM

APPLICATION FOR PERMIT

2-09703
75.

To Divert ~~Appropriate~~ the Underground Waters of the State of New Mexico

- Date Received 10-1-99 File No. L-11031
- Name of applicant Texaco Exploration and Production, Inc.
Mailing address P. O. Box 730
City and State Hobbs, NM 88240-0730
 - Source of water supply Shallow Water Aquifer, located in Lea County Basin
(artesian or shallow water aquifer) (name of underground basin)
 - The well is to be located in the NE 1/4 SE 1/4 Section 24 Township 19 South
Range 36 East N.M.P.M., or Tract No. _____ of Map No. _____ of the _____ District,
on land owned by State of New Mexico - Land Office
 - Description of well: name of driller RW-3, Scarborough Drilling, Inc., Lamesa, Texas;
Outside Diameter of casing 4" inches; Approximate depth to be drilled 70' feet;
 - Quantity of water to be appropriated and beneficially used 3.0 acre feet,
(consumptive use, diversion)
for Environmental Remediation purposes.
 - Acres to be irrigated or place of use _____ acres.

Subdivision	Section	Township	Range	Acres	Owner

7. Additional statements or explanations Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

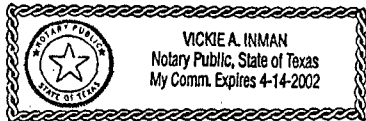
I, Mark J. Larson, affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

Texaco Exploration and Production, Inc., Permittee,

By: [Signature]

Subscribed and sworn to before me this 29th day of September, A.D., 19 99.

My commission expires 4-14-2002 [Signature]
Notary Public



TH172270

Number of this permit _____

ACTION OF STATE ENGINEER

After notice pursuant to statute and by authority vested in me, this application is approved provided it is not exercised to the detriment of any others having existing rights; further provided that all rules and regulations of the State Engineer pertaining to the drilling of _____ wells be complied with; and further subject to the following conditions: _____

[illegible]

Proof of completion of well shall be filed on or before _____, 19____

Proof of application of water to beneficial use shall be filed on or before _____, 19____

Witness my hand and seal this _____ day of _____, A.D., 19 _____

Thomas C. Turney, State Engineer

By: _____

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$25.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5.—Irrigation use shall be stated in acre feet of water per acre per annum to be applied on the land. If for municipal or other purposes, state total quantity in acre feet to be used annually.

Sec. 6—Describe only the lands to be irrigated or where water will be used. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7.—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

2-09704
15.

Djvert

[illegible]

111442

Texaco Exploration and Production, Inc.

Clatsop

My commission expires 4-15-2002

day of October, A.D., 1999.

[Signature]
Notary Public

T#172258

Number of this permit _____

ACTION OF STATE ENGINEER

After notice pursuant to statute and by authority vested in me, this application is approved provided it is not exercised to the detriment of any others having existing rights; further provided that all rules and regulations of the State Engineer pertaining to the drilling of _____ wells be complied with; and further subject to the following conditions: _____

[The page contains faint horizontal lines, suggesting it was part of a lined notebook or document.]

Proof of completion of well shall be filed on or before _____, 19____

Proof of application of water to beneficial use shall be filed on or before _____, 19 _____

Witness my hand and seal this _____ day of _____, A.D., 19_____

Thomas C. Turney, State Engineer

By: _____

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$25.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5.—Irrigation use shall be stated in acre feet of water per acre per annum to be applied on the land. If for municipal or other purposes, state total quantity in acre feet to be used annually.

Sec. 6—Describe only the lands to be irrigated or where water will be used. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7.—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

IMPORTANT-READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM

APPLICATION FOR PERMIT

2-69704
75.

Divers
To ~~Appropriate~~ the Underground Waters of the State of New Mexico

- Date Received 11-9-99 File No. CP-885
- Name of applicant Texaco Exploration and Production, Inc.
Mailing address P. O. Box 730
City and State Hobbs, NM 88240-0730
 - Source of water supply Shallow Water Aquifer, located in Capitan
(artesian or shallow water aquifer) (name of underground basin)
 - The well is to be located in the NW 1/4 NW 1/4 SE 1/4, Section 24 Township 24 South
Range 36 East N.M.P.M., or Tract No. _____ of Map No. _____ of the Capitan District,
on land owned by ~~XXXXXXXXXX~~ Ludean Cantrell
 - Description of well: name of driller RW-1, Scarborough Drilling, Inc., Lamesa, Texas
Outside Diameter of casing 5" inches; Approximate depth to be drilled 175' feet;
 - Quantity of water to be appropriated and beneficially used 32.5 acre feet,
(consumptive use, diversion)
for Environmental Remediation purposes.
 - Acreage to be irrigated or place of use _____ acres.

Subdivision	Section	Township	Range	Acres	Owner

7. Additional statements or explanations Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau direction and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's injection system.

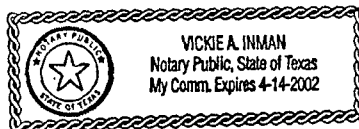
I, Mark J. Larson (for Applicant), affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.

Texaco Exploration and Production, Inc., Permittee,

By: [Signature]

Subscribed and sworn to before me this 26th day of October, A.D., 19 99

My commission expires 4-14-2002 [Signature]
Notary Public



T#172263

Number of this permit _____

ACTION OF STATE ENGINEER

After notice pursuant to statute and by authority vested in me, this application is approved provided it is not exercised to the detriment of any others having existing rights; further provided that all rules and regulations of the State Engineer pertaining to the drilling of _____ wells be complied with; and further subject to the following conditions: _____

[illegible]

Proof of completion of well shall be filed on or before _____, 19____

Proof of application of water to beneficial use shall be filed on or before _____, 19 _____

Witness my hand and seal this _____ day of _____, A.D., 19 _____

Thomas C. Turney, State Engineer

By: _____

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$25.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5—Irrigation use shall be stated in acre feet of water per acre per annum to be applied on the land. If for municipal or other purposes, state total quantity in acre feet to be used annually.

Sec. 6—Describe only the lands to be irrigated or where water will be used. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7.—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.

2-69704
75.

Divert

Subdivision	Section	Township	Range	Acres	Owner
-------------	---------	----------	-------	-------	-------

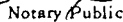
[illegible]

7. Additional statements or explanations - (NMOCD), Environmental Bureau direction and after correspondence between
applicant and the Bureau, a plan has been approved to initiate corrective
action. The action will include recovering water from said well, equipped
with pumping equipment, and disposal of produced water in applicant's injec-
tion well.

Texaco Exploration and Production, Inc., Permittee,

Subscribed and sworn to before me this 26th day of October, A.D., 1999

My commission expires 4-14-2002



T#172265

Number of this permit _____

ACTION OF STATE ENGINEER

After notice pursuant to statute and by authority vested in me, this application is approved provided it is not exercised to the detriment of any others having existing rights; further provided that all rules and regulations of the State Engineer pertaining to the drilling of _____ wells be complied with; and further subject to the following conditions: _____

[illegible]

Proof of completion of well shall be filed on or before _____, 19____

Proof of application of water to beneficial use shall be filed on or before _____, 19 _____

Witness my hand and seal this _____ day of _____, A.D., 19_____.

Thomas C. Turney, State Engineer

By: _____

INSTRUCTIONS

This form shall be executed, preferably typewritten, in triplicate and shall be accompanied by a filing fee of \$25.00. Each of triplicate copies must be properly signed and attested.

A separate application for permit must be filed for each well used.

Secs. 1-4—Fill out all blanks fully and accurately.

Sec. 5.—Irrigation use shall be stated in acre feet of water per acre per annum to be applied on the land. If for municipal or other purposes, state total quantity in acre feet to be used annually.

Sec. 6.—Describe only the lands to be irrigated or where water will be used. If on unsurveyed lands describe by legal subdivision "as projected" from the nearest government survey corners, or describe by metes and bounds and tie survey to some permanent, easily located natural object.

Sec. 7.—If lands are irrigated from any other source, explain in this section. Give any other data necessary to fully describe water right sought.



STATE OF NEW MEXICO
OFFICE OF THE STATE ENGINEER
SANTA FE

THOMAS C. TURNEY
State Engineer

SANTA FE, NM 87504-5102
POST OFFICE BOX 25102
SANTA FE, NEW MEXICO 87504-5102
(505) 827-6147

August 7, 2000

Hearing Examiner
Office of the State Engineer
Hearing Unit
P. O. Box 25102
Santa Fe, NM 87504-5102

Re: Applications of Texaco, L-11029 through L-11031 and CP-884
through CP-886

Dear Mr. Examiner:

Enclosed you will find the OSE/Water Rights Division Request for Pre-Hearing Scheduling Conference with attachments. Please note that there are a number of important issues that WRD has delineated for you. Perhaps some of these should be addressed prior to any scheduling of discovery and hearing?

Please also note that I will be out of the country the month of October so will be unable to participate in any conferences or other related matters during that time period.

Thank you!

Most sincerely,

Ann Finley Wright
Special Assistant Attorney General
(505) 827-6147

attachments

c: each person listed on entitled to notice page

Andrew B. Core
Vincent Chavez
Leticia Sheridan, Esq.
Kenneth Meeks, Esq.

**BEFORE THE NEW MEXICO
STATE ENGINEER**

IN THE MATTER OF THE APPLICATIONS OF)	
TEXACO EXOLORATION AND PRODUCTION,)	HU No.: _____
INC. TO DIVERT THE UNDERGROUND WATERS)	OSE Nos.: L-11029
OF THE LEA AND CAPITAN UNDERGROUND)	L-11030, L-11031,
WATER BASINS, NEW MEXICO.)	CP-884, CP-885,
)	CP-886
)	

REQUEST FOR PRE-HEARING SCHEDULING CONFERENCE

COMES NOW, Office of the State Engineer, Water Rights Division, through its attorney to request that the Hearing Unit schedule a Pre-Hearing Scheduling Conference in the above-captioned matter pursuant to "The Instructions for Parties in State Engineer Administrative Hearings," page 2.

1. Assigned Hearing Examiner: _____
2. Type of Case: These six (6) applications were filed October 1, 1999. The applicant proposes, with permit approval, to initiate corrective action under a directive from the New Mexico Oil Conservation Division, Environmental Bureau for environmental remediation [Pollution Plume Control—a term of art in the Oil and Gas industry]. The applicant proposes to divert 3.0 acre feet per annum from each of the three (3) Lea Underground Basin applications, if approved. The applicant proposes to divert 32.5 acre feet per annum from two (2) of the Capitan Underground Basin application and 6.5 acre feet per annum from one (1) Capitan Underground Basin application. It is unclear whether or not this "diversion" will be applied to

beneficial use and consumed or not, but the water will be run through applicant's disposal system.

3. The protestants particularly object to the use of fresh water in a disposal system, which could be interpreted as being contrary to conservation within the state.
4. Dates of hearings presently set: None, however there may be other pending, but unprotested, applications filed by this same applicant.
5. Special Matters to be hearing upon this request: Prior to any discovery or other scheduling, the following should be decided or explained:

A. Whether or not the legal descriptions of the proposal, which appeared in the published notice for the three Lea Underground Basin applications are correct or incorrect, which would require republication to meet due process standards. One of the protestants claims that the descriptions are wrong. A schedule for discovery, filing of witness lists and exhibits and the date for hearing cannot be established until this is decided. Republication most likely would attract additional protestants.

B. The applicant should explain the purpose and intent of the pending applications [particularly the change on the standard application from " To Appropriate...." to "To Divert the Underground Waters of the State of New Mexico"]. It should also indicate whether or not these two sets of applications represent one single operation or whether there are two separate operations, which should be heard separately.

C. Applicant must indicate what source aquifer or source aquifers will be used for these proposed applications. It should be required to name the formation or formations involved.

D. New Mexico Department of Energy and Minerals, Oil Conservation Division, Environmental Bureau, William C. Olson, Hydrologist, should be asked to act as *amicus curi* to the Hearing Examiner or the Bureau should be asked to participate in this matter in order to objectively make clear what Texaco is required to do as well as why and how it is so required.

6. Estimated total time required: Two hours

7. Attachments:

A. A list of each and every party entitled to notice, their name, firm if applicable, capacity in that firm, address and telephone number and FAX number, if available.

B. Addressed envelopes for all parties entitled to notice.

C. A copy of each application.

D. A copy of the legal notice.

E. A copy of each protest.

Respectfully submitted,



Ann Finley Wright
Special Assistant Attorney General
Office of the State Engineer
P. O. Box 25102
Santa Fe, NM 87504-5102

(505) 827-6147

Currently no FAX number

ATTORNEY FOR WATER RIGHTS DIVISION (WRD)

Certificate of Mailing

I certify that a copy of this Pleading and all attachments were mailed this 7 day of August, 2000 to those listed below as entitled to notice.



Ann Finley Wright

ATTACHMENT A ---- LIST OF PARTIES ENTITLED TO NOTICE

Texaco Exploration and Production, Inc. APPLICANT
Attn: Mark J. Larsen, Senior Project Manager
Highlander Environmental Corporation
1910 North Big Spring
Midland, TX 79705
(915) 682-4559
FAX (915) 682-3946

Ann Finley Wright, Esq. ATTORNEY FOR WATER RIGHTS DIVISION
Office of the State Engineer
P. O. Box 25102
Santa Fe, NM 87504-5102

Jim Cooper PROTESTANT Lea County applications, water right holder
Box 55
Monument, NM 88265
(505) 397-2045 no fax listed

Becky Jo Doom PROTESTANT all applications but CP-886, claims no water
HCR 68 Box 188 rights
Jal, NM 88252
(505) 395-2877 no fax listed

Bill and Elena Grobe PROTESTANTS CP-886 application only, water
P. O. Box QQ right holders
Jal, NM 88152
no phone or fax listed

George and Joyce Willis PROTESTANTS, CP-886 application only,
Willis Ranch water right holders
P. O. Box 307
#1 Willis Road
Jal, NM 88252
no phone or fax listed

Tom & Winnie Kennann PROTESTANTS, all applications, claim no water rights
P. O. Box 186
Eunice, NM 88321-0186
(505) 394-2571
FAX (505) 394-2452

William C. Olson, Hydrologist
Dept. of Energy and Minerals, OCD, EB
2040 South Pacheco Street
Santa Fe, NM 87505
(505) 827-7154
fax number unknown

AFFIDAVIT OF PUBLICATION

L-11,029

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 3
_____ weeks.

Beginning with the issue dated

February 15 2000
and ending with the issue dated

February 29 2000

Kathi Bearden
Publisher

Sworn and subscribed to before
me this 29th day of

February 2000

Jodi Benson
Notary Public.

My Commission expires
October 18, 2000
(Seal)

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

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Ex-
ploration and Production, Inc. P.O. Box 730, Hobbs, NM
88240-0730, filed application No. L-11,029 with the STATE
ENGINEER for permit to divert up to 3.0 acre-feet per annum
of shallow groundwater of the Lea County Underground Water
Basin and commencing the use of groundwater recovery well
No. 2, to numbered L-11,029, 4 inches in diameter and approx-
imately 70 feet in depth located in the NE1/4SE1/4 of Section
24, Township 19 South, Range 36 East, N.M.P.M., for Environ-
mental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD),
Environmental Bureau Direction, and after correspondence be-
tween applicant and the Bureau, a plan has been approved to
initiate corrective action. The action will include recovering wa-
ter from said well, equipped with pumping equipment, and dis-
posal of produced water in applicant's disposal system.

Well No. L-11,029 is located approximately three miles east of
Monument, New Mexico on County Road C-42 then approxi-
mately one half mile north of County Road C-42.

Any person, firm or corporation or other entity objecting that
the granting of the application will be detrimental to the objec-
tor's water right shall have standing to file objections or pro-
tests. Any person, firm or corporation or other entity objecting
that the granting of the application will be contrary to the con-
servation of water within the state or detrimental to the public
welfare of the state and showing that the objector will be sub-
stantially and specifically affected by the granting of the appli-
cation shall have standing to file objections or protests. Provid-
ed, however, that the State of New Mexico or any of its branch-
es, agencies, departments, boards, instrumentalities or institu-
tions, and all political subdivisions of the state and their agen-
cies, instrumentalities and institutions shall have standing to
file objections or protest. The protest or objections shall be in
writing and shall set forth all protestants's or objector's reasons
why the application should not be approved and must be filed,
in triplicate, with Thomas C. Turney, State Engineer, 1900 W.
Second St., Roswell, New Mexico 88201, within ten (10) days
after the date of the last publication of this Notice. Valid objec-
tions or protests must be legible, signed and include a com-
plete mailing address. If no valid objection or protest is filed,
the state engineer will evaluate the application for impairment
to existing water rights, public welfare of the state and conser-
vation of water within the state prior to final disposition of the
application.

#17178

01101308000

01538955

Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

L-11,030

I, KATHI BEARDEN

Publisher

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

of 3

weeks.

Beginning with the issue dated

February 15 2000

and ending with the issue dated

February 29 2000

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 29th day of

February 2000

Jodi Benson

Notary Public.

My Commission expires
October 18, 2000
(Seal)

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. L-11,030 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commence the use of existing groundwater recovery well No. 1, to numbered L-11,030, 4 inches in diameter and approximately 70 feet in depth located in the NW1/4SE1/4 of Section 24, Township 19 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCDD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. L-11,030 is located approximately three miles east of Monument, New Mexico on County Road C-42 then approximately one half mile north of County Road C-42.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants' or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17177

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

01101308000

02535050

Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

AFFIDAVIT OF PUBLICATION

L-11,031

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 3

weeks.

Beginning with the issue dated

February 15 2000

and ending with the issue dated

February 29 2000

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 29th day of

February 2000

Jodi Benson

Notary Public.

My Commission expires
October 18, 2000
(Seal)

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. L-11,031 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commencing the use of groundwater recovery well No. 3, to numbered L-11,031, 4 inches in diameter and approximately 70 feet in depth located in the NE1/4SE1/4 of Section 24, Township 19 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. L-11,031 is located approximately three miles east of Monument, New Mexico on County Road C-42 then approximately one half mile north of County Road C-42.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17179

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

01101308000 01538956
Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 3
_____ weeks.

Beginning with the issue dated

February 15 2000
and ending with the issue dated

February 29 2000

Kathi Bearden
Publisher

Sworn and subscribed to before

me this 29th day of

February 2000

Jodi Benson
Notary Public.

My Commission expires
October 18, 2000
(Seal)

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

CP-884

LEGAL NOTICE
February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Ex-
ploration and Production, Inc., P.O. Box 730, Hobbs, NM
88240-0730, filed application No. CP-884 with the STATE EN-
GINEER for permit to divert up to 32.5 acre-feet per annum of
shallow groundwater of the Captain Underground Water Basin
and commencing the use of groundwater recovery well No. 2,
to numbered CP-884, 5 inches in diameter and approximately
175 feet in depth located in the NW1/4NW1/4SE1/4 of Section
24, Township 24 South, Range 36 East, N.M.P.M., for Environ-
mental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD),
Environmental Bureau Direction, and after correspondence be-
tween applicant and the Bureau, a plan has been approved to
initiate corrective action. The action will include recovering wa-
ter from said well, equipped with pumping equipment, and dis-
posal of produced water in applicant's disposal system.

Well No. CP-884 is located approximately six miles north of
Jal, New Mexico on State Highway 18 then west approximately
two miles of County Road C-7.

Any person, firm or corporation or other entity objecting that
the granting of the application will be detrimental to the objec-
tor's water right shall have standing to file objections or pro-
tests. Any person, firm or corporation or other entity objecting
that the granting of the application will be contrary to the con-
servation of water within the state or detrimental to the public
welfare of the state and showing that the objector will be sub-
stantially and specifically affected by the granting of the appli-
cation shall have standing to file objections or protests. Provid-
ed, however, that the State of New Mexico or any of its branch-
es, agencies, departments, boards, instrumentalities or institu-
tions, and all political subdivisions of the state and their agen-
cies, instrumentalities and institutions shall have standing to
file objections or protest. The protest or objections shall be in
writing and shall set forth all protestants's or objector's reasons
why the application should not be approved and must be filed,
in triplicate, with Thomas C. Turney, State Engineer, 1900 W.
Second St., Roswell, New Mexico 88201, within ten (10) days
after the date of the last publication of this Notice. Valid ob-
jections or protests must be legible, signed and include a com-
plete mailing address. If no valid objection or protest is filed,
the state engineer will evaluate the application for impairment
to existing water rights, public welfare of the state and conser-
vation of water within the state prior to final disposition of the
application.

#17181

01101308000

01538958

Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 3
_____ weeks.

Beginning with the issue dated

February 15 2000
and ending with the issue dated

February 29 2000

Kathi Bearden
Publisher

Sworn and subscribed to before

me this 29th day of

February 2000

Jodi Henson
Notary Public.

My Commission expires
October 18, 2000
(Seal)

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

CP-885

LEGAL NOTICE
February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Ex-
ploration and Production, Inc. P.O. Box 730, Hobbs, NM
88240-0730, filed application No. CP-885 with the STATE EN-
GINEER for permit to divert up to 32.5 acre-feet per annum of
shallow groundwater of the Captain Underground Water Basin
and commencing the use of groundwater recovery well No. 2,
to numbered CP-885, 5 inches in diameter and approximately
175 feet in depth located in the NW1/4NW1/4SE1/4 of Section
24, Township 24 South, Range 36 East, N.M.P.M., for Environ-
mental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD),
Environmental Bureau Direction, and after correspondence be-
tween applicant and the Bureau, a plan has been approved to
initiate corrective action. The action will include recovering wa-
ter from said well, equipped with pumping equipment, and dis-
posal of produced water in applicant's disposal system.

Well No. CP-885 is located approximately six miles north of
Jal, New Mexico on State Highway 18 then west approximately
two miles of County Road C-7.

Any person, firm or corporation or other entity objecting that
the granting of the application will be detrimental to the objec-
tor's water right shall have standing to file objections or pro-
tests. Any person, firm or corporation or other entity objecting
that the granting of the application will be contrary to the con-
servation of water within the state or detrimental to the public
welfare of the state and showing that the objector will be sub-
stantially and specifically affected by the granting of the appli-
cation shall have standing to file objections or protests. Provid-
ed, however, that the State of New Mexico or any of its branch-
es, agencies, departments, boards, instrumentalities or institu-
tions, and all political subdivisions of the state and their agen-
cies, instrumentalities and institutions shall have standing to
file objections or protest. The protest or objections shall be in
writing and shall set forth all protestants's or objector's reasons
why the application should not be approved and must be filed,
in triplicate, with Thomas C. Turney, State Engineer, 1900 W.
Second St., Roswell, New Mexico 88201, within ten (10) days
after the date of the last publication of this Notice. Valid objec-
tions or protests must be legible, signed and include a com-
plete mailing address. If no valid objection or protest is filed,
the state engineer will evaluate the application for impairment
to existing water rights, public welfare of the state and conser-
vation of water within the state prior to final disposition of the
application.

01101308000

01538959

Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 3

weeks.

Beginning with the issue dated

February 15 2000

and ending with the issue dated

February 29 2000

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 29th day of

February 2000

Jodi Benson

Notary Public.

My Commission expires
October 18, 2000
(Seal)

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

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. CP-886 with the STATE ENGINEER for permit to divert up to 6.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No. 1, to numbered CP-886, 6 inches in diameter and approximately 73 feet in depth located in the SW1/4SE1/4 of Section 35, Township 24 South, Range 37 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. CP-886 is located approximately two miles east of Jal, New Mexico on State Highway 128 then north approximately 3 miles of County Road C-13.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17180

01101308000

01538957

Texaco E&P, Inc.
205 E. Bender
Hobbs, NM 88240

February 15, 2000

State Engineers Office
ATTN: Thomas C. Turney
1900 W. Second St.
Roswell, NM 88201

RE: Texaco Legal Notice, water use

Mr. Turney:

As I read my paper today, I found that Texaco is applying to pump and dispose of fresh water.

I am in disagreement with this pumping. First of all, I have a permitted fresh water well adjacent to this site that. I feel that allowing them to pump this water out will deplete my water well or lower the water table enough that I will not be able to use it. Secondly, with the shortage of water in Lea Co. and the adjacent areas, it would be more environmentally beneficial if the water was treated and reused other than disposed of. Thirdly, the legal notice was mistaken, the site is west of Monument not east.

Please accept this letter as my protest to the Texaco L-11,029 and L-11,031 notice.

Thank you,

A handwritten signature in cursive script, appearing to read "Jim Cooper".

Jim Cooper
Box 55
Monument, NM 88265
(505)397-2045

LEGAL

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. L-11,029 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commencing the use of groundwater recovery well No. 2, to numbered L-11,029, 4 inches in diameter and approximately 70 feet in depth located in the NE1/4SE1/4 of Section 24, Township 19 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. L-11,029 is located approximately three miles east of Monument, New Mexico on County Road C-42 then approximately one half mile north of County Road C-42.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17178

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. CP-885 with the STATE ENGINEER for permit to divert up to 32.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No. 2, to numbered CP-885, 5 inches in diameter and approximately 175 feet in depth located in the NW1/4NW1/4SE1/4 of Section 24, Township 24 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. CP-885 is located approximately six miles north of Jai, New Mexico on State Highway 18 then west approximately two miles of County Road C-7.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. CP-884 with the STATE ENGINEER for permit to divert up to 32.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No. 2, to numbered CP-884, 5 inches in diameter and approximately 175 feet in depth located in the NW1/4NW1/4SE1/4 of Section 24, Township 24 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. CP-884 is located approximately six miles north of Jai, New Mexico on State Highway 18 then west approximately two miles of County Road C-7.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17181

LEGAL NOTICE

February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. CP-886 with the STATE ENGINEER for permit to divert up to 6.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No. 1, to numbered CP-886, 6 inches in diameter and approximately 73 feet in depth located in the SW1/4SE1/4 of Section 35, Township 24 South, Range 37 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

ter from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. CP-885 is located approximately six miles north of Jal, New Mexico on State Highway 18 then west approximately two miles of County Road C-7.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17182

Unit I

LEGAL NOTICE
February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. L-11,031 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commencing the use of groundwater recovery well No. 3, to numbered L-11,031, 4 inches in diameter and approximately 70 feet in depth located in the NE1/4SE1/4 of Section 24, Township 19 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. L-11,031 is located approximately three miles east of Monument, New Mexico on County Road C-42 then approximately one half mile north of County Road C-42.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17179

Unit O

LEGAL NOTICE
February 15, 22, & 29, 2000

NOTICE is hereby given that on October 1, 1999, Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, NM 88240-0730, filed application No. CP-886 with the STATE ENGINEER for permit to divert up to 6.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No. 1, to numbered CP-886, 6 inches in diameter and approximately 73 feet in depth located in the SW1/4SE1/4 of Section 35, Township 24 South, Range 37 East, N.M.P.M., for Environmental Remediation purposes.

Pursuant to New Mexico Oil Conservation Division (NMOCD), Environmental Bureau Direction, and after correspondence between applicant and the Bureau, a plan has been approved to initiate corrective action. The action will include recovering water from said well, equipped with pumping equipment, and disposal of produced water in applicant's disposal system.

Well No. CP-886 is located approximately two miles east of Jal, New Mexico on State Highway 128 then north approximately 3 miles of County Road C-13.

Any person, firm or corporation or other entity objecting that the granting of the application will be detrimental to the objector's water right shall have standing to file objections or protests. Any person, firm or corporation or other entity objecting that the granting of the application will be contrary to the conservation of water within the state or detrimental to the public welfare of the state and showing that the objector will be substantially and specifically affected by the granting of the application shall have standing to file objections or protests. Provided, however, that the State of New Mexico or any of its branches, agencies, departments, boards, instrumentalities or institutions, and all political subdivisions of the state and their agencies, instrumentalities and institutions shall have standing to file objections or protest. The protest or objections shall be in writing and shall set forth all protestants's or objector's reasons why the application should not be approved and must be filed, in triplicate, with Thomas C. Turney, State Engineer, 1900 W. Second St., Roswell, New Mexico 88201, within ten (10) days after the date of the last publication of this Notice. Valid objections or protests must be legible, signed and include a complete mailing address. If no valid objection or protest is filed, the state engineer will evaluate the application for impairment to existing water rights, public welfare of the state and conservation of water within the state prior to final disposition of the application.

#17180

Unit A

Becky Jo Doom
HCR 68 Box 188
Jal, New Mexico 88252
(505) 395-2877
March 6, 2000

Mr. Thomas C. Turney
State Engineer
1900 W. Second St.
Roswell, NM 88201

Dear Mr. Turney:

I am taking this opportunity to object to the applications filed by Texaco Exploration and Production, Inc. P. O. Box 730, Hobbs, N. M. 88240 for:

- (1) permit to divert up to 32.5 acre feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery well No.2 to numbered CP-884. 5 inches in diameter and approximately 175 feet in depth located in the NW $\frac{1}{4}$ NW $\frac{1}{4}$ SE $\frac{1}{4}$ of section 24, township 24 south, range 36 east, NMPM for Environmental Remediation purposes.
- (2) permit to divert up to 3.0 acre feet per annum of shallow groundwater of the Lea County Water Basin and commence the use of existing groundwater recovery well No. 1, to numbered L-11,030, 4 inches in diameter and approximately 70 feet in depth located in the NW $\frac{1}{4}$ SE $\frac{1}{4}$ section 24, township 19 south, range 36 east, NMPM for Environmental Remediation purposes.
- (3) permit to divert up to 3.0 acre feet per annum of shallow groundwater of the Lea County Water Basin and commence the use of existing groundwater recovery well No. 3, to numbered L-11031, 4 inches in diameter and approximately 70 feet in depth located in the NE $\frac{1}{4}$ SE $\frac{1}{4}$ of section 24, township 19 south, range 36 east, NMPM for Environmental Remediation purposes.
- (4) permit to divert up to 32.5 acre feet per annum of shallow groundwater of the captain Underground Water Basin and commencing the use of groundwater recovery well No.2 to numbered CP-885, 5 inches in diameter and approximately 175 feet in depth located in the NW $\frac{1}{4}$ NW $\frac{1}{4}$ SE $\frac{1}{4}$ of section 24, township 24 south, range 36 east, NMPM for Environmental Remediation purposes.
- (5) permit to divert up to 3.0 acre feet per annum of shallow groundwater of the Lea County Underground water Basin and commencing the use of groundwater recovery well No.2, t numbered L-11,029, 4 inches in diameter and approximately 70 feet in depth located in the NE $\frac{1}{4}$ SE $\frac{1}{4}$ of section 24,

Oil Conservation Commission
1000 West Broadway
Hobbs, NM 88240

Bill & Elena Grobe
P.O. Box Q Q
Jal, New Mexico 88252

Mr. Thomas C Turney
State Engineer
1900 W. Second St.
Roswell, New Mexico 88201

Mr. Turney:

We are at this time objecting to the applications filed by Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, New Mexico 88240 for : application No. CP-886 for permit to divert up to 6.5 acre feet of shallow ground water of the Captain Underground Water Basin located in the SW1/4SE1/4 of Section 35, Township 24 South, Range 37 East, N.M.P.M. .

We are ranchers in this area. All of our ground water for watering our animals and for agriculture use comes from this basin as a rule. Our very living is dependent on this water. It seems that if the water is contaminated , then the source should be found and eliminated. The ground water should be cleaned and put back into the basin for beneficial use.

It does not seem to us that taking the water from the basin and disposing into another zone or basin will solve the problem and could result in disastrous consequences for the agricultural community that is dependent on this water. Our ground water is scarce and is being contaminated at an alarming rate as well as being depleted. we cannot afford to take water from any fresh water basin and not put it to beneficial use.

We are asking that the application not be approved for taking the water from the Capitan Basin and disposing into a disposal well and kept from benifical use. Some other means of remedaition should be employed.

Thank you,

William J. Grobe
Elena B. Grobe
William J. Grobe and Elena B. Grobe

RECEIVED
JUL 11 1988
FBI - ALBUQUERQUE

Willis Ranch
George and Joyce Willis (Owners)
P.O. Box 307
1 Willis Road
Jal, New Mexico 88252

Mr. Thomas C Turney
State Engineer
1900 W. Second St.
Roswell, New Mexico 88201

Mr. Turney:

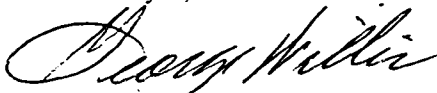
We are at this time objecting to the applications filed by Texaco Exploration and Production, Inc. P.O. Box 730, Hobbs, New Mexico 88240 for : application No. CP-886 for permit to divert up to 6.5 acre feet of shallow ground water of the Captain Underground Water Basin located in the SW1/4SE1/4 of Section 35, Township 24 South, Range 37 East, N.M.P.M. .

We are ranchers in this area and are surface owners of record. All of our ground water for watering our animals and for agriculture use comes from this basin as a rule. Our very living is dependent on this water. It seems that if the water is contaminated , then the source should be found and eliminated. The ground water should be cleaned and put back into the basin for beneficial use.

It does not seem to us that taking the water from the basin and disposing into another zone or basin will solve the problem and could result in disastrous consequences for the agricultural community that is dependent on this water. Our ground water is scarce and is being contaminated at an alarming rate as well as being depleted. we cannot afford to take water from any fresh water basin and not put it to beneficial use.

We are asking that the application not be approved for taking the water from the Capitan Basin and disposing into a disposal well and kept from beneficial use. Some other means of remediation should be employed.

Thank you,



George and Joyce Willis

Joyce Willis 3/07/00

RECEIVED
MAR 10 1900

Tom & Winnie Kennann

Post Office Box 186 • Eunice, New Mexico 88231-0186 • (505) 394-2571 • Fax (505) 394-2452

March 2, 2000

Mr. Thomas C. Turney, State Engineer
1900 West Second Street
Roswell, New Mexico 88201

CERTIFIED MAIL NO. Z 102 527 015

Re: Our objections to pending filed applications of Texaco Exploration and Production, Inc., hereinafter referred to as TEPI, the application numbers are as follows:
L-11,029; L-11,030; L-11,031; CP-884; CP-885 and CP-886 followed with brief descriptions as described in the applications.

Dear Mr Turney:

We object to the following applications. Our concern deals with the conservation of drinking water for human and animal consumption. Uncontaminated ground water, shallow or deep, in Southern Lea County is in short supply so wasting of water in the proposed manner by disposal should **NOT BE PERMITTED**. Although the pumping of water may be necessary to correct the contamination, the pumped water should be treated to render the product safe and useful.

TEPI filed application No. L-11,029 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commencing the use of groundwater recovery Well No. 2, to numbered L-11,029, 4 inches in diameter and approximately 70 feet in depth located in the NE1/4 SE/4 of Sec. 24, T19S, R36E, N.M.P.M., for Environmental purposes.

TEPI filed application No. L-11,030 with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commence the use of existing groundwater recovery Well No. 1, to numbered L-11,030, 4 inches in diameter and approximately 70 feet in depth located in the NW/4 SE/4 of Section 24, Township 19 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

TEPI filed application No. L-11,031 filed with the STATE ENGINEER for permit to divert up to 3.0 acre-feet per annum of shallow groundwater of the Lea County Underground Water Basin and commencing the use of groundwater recovery Application No. CP-886, Well No. 3, to numbered L-11,031, 4 inches in diameter and approximately 70 feet in depth, (located NE/4 SE/4 of Sec. 24, T19S, R36E, N.M.P.M.), for Environmental Remediation purposes.

TEPI filed application No. CP-884 with the State Engineer for permit to divert up to 32.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery Well No. 2, to numbered CP-884, 5 inches in diameter and approximately 175 feet in depth located NW/4 NW/4 SE/4 of Sec. 24, T24S, R36E, N.M.P.M., for Environmental purposes.

TEPI filed application No. CP-885 with the STATE ENGINEER for permit to divert up to 32.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery Well No. 2, to numbered CP-885, 5 inches in diameter and approximately 175 feet in depth located in the NW/4 NW/4 SE/4 of Section 24, Township 24 South, Range 36 East, N.M.P.M., for Environmental Remediation purposes.

TEPI filed application No. CP-886 with the STATE ENGINEER for permit to divert up to 6.5 acre-feet per annum of shallow groundwater of the Captain Underground Water Basin and commencing the use of groundwater recovery Well No. 1, to numbered CP-886, 6 inches in diameter and approximately 73 feet in depth, located in the SW/4 SE/4 of Sec. 35, T24S, R37E, N.M.P.M., for Environmental Remediation purposes.

Sincerely yours,

Tom Kennann
Winnie Kennann

Tom Kennann and Winnie Kennann

Sent in triplicate.

xc: NMOCD Environmental Bureau
NM State Senator Carroll H. Leavell
NM State Representative Stevan Pearce
NM State Commissioner of Public Lands Ray Powell, M.S., D.V.M.

B:\002STENGWAT



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 2, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-612

Mr. Rodney Bailey
Texaco E&P Inc.
205 E. Bender
Hobbs, New Mexico 88240

**RE: COOPER-JAL UNIT
LEA COUNTY, NEW MEXICO**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has reviewed Texaco Exploration & Development's (Texaco) November 18, 1998 "WORK PLAN FOR PLUME DELINEATION AND MODIFICATION TO PROPOSED GROUNDWATER MONITORING SCHEDULE, TEXACO EXPLORATION AND PRODUCTION, INC., COOPER-JAL UNIT SOUTH INJECTION STATION, LEA COUNTY, NEW MEXICO". This document which was submitted on behalf of Texaco by their consultant Highlander Environmental Corp. contains the Texaco's proposed work plan for additional investigation of the extent of ground water contamination related to an unlined emergency pit at the Cooper-Jal Unit South Injection Station located in Unit J, Section 24, T24S, R36E NMPM, Lea County, New Mexico. The document also contains Texaco's proposed modifications to the site ground water monitoring plan.

The above referenced investigation work plan and proposed ground water monitoring plan modifications are **approved** with the following conditions:

1. Texaco will complete the new monitor wells as follows:
 - a. An appropriately sized gravel pack will be set in the annulus around the well screen from the bottom of the hole to 2-3 feet above the top of the well screen.

Mr. Rodney G. Bailey
February 2, 1999
Page 2

- b. A 2-3 foot bentonite plug will be placed above the gravel pack.
 - c. The remainder of the hole will be grouted to the surface with cement containing 3-5% bentonite.
 - d. A concrete pad and locking well cover will be placed at the surface.
 - e. The well will be developed after construction using EPA approved procedures.
2. No less than 48 hours after the wells are developed, ground water from all monitor wells at each site will be purged, sampled and analyzed for concentrations of major cations and anions, total dissolved solids (TDS) EPA approved methods and quality assurance/quality control (QA/QC).
3. All wastes generated during the investigation will be disposed of at an OCD approved facility.
4. Texaco will submit the results of the additional investigations to the OCD in the annual report. The report will include the following investigative information:
- a. A description of the investigation activities which occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well.
 - c. A water table map showing the location of the pit, monitor wells, recovery wells and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient created using the water table elevation from each monitor well.
 - d. Summary tables of all past and present ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
 - e. The disposition of all wastes generated.

Please be advised that OCD approval does not relieve Texaco of liability should the investigation actions fail to adequately define the extent of contamination related to Texaco's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Texaco of responsibility for compliance with any other federal, state or local laws and regulations.

Mr. Rodney G. Bailey
February 2, 1999
Page 3

If you have any questions, please contact me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office
Mark J. Larson, Highlander Environmental Corp.

Z 274 520 612

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	\$
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



Highlander Environmental Corp.

Midland, Texas

November 18, 1998

RECEIVED

Mr. William C. Olson
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

NOV 23 1998

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

**Re: Work Plan for Plume Delineation and Modification to Proposed
Groundwater Monitoring Schedule, Texaco Exploration and Production,
Inc., Cooper-Jal Unit South Injection Station, Lea County, New Mexico**

Dear Mr. Olson:

Texaco Exploration and Production, Inc. (Texaco) has requested Highlander Environmental Corp. (Highlander) to prepare a work plan to delineate a groundwater contaminant plume and to modify the proposed groundwater monitoring schedule for the Cooper-Jal Unit South Injection Station (Site), located in Lea County, New Mexico.

Based on our meeting of November 12, 1998, Texaco will install one additional monitor well to determine the down gradient extent of chloride and total dissolved solids (TDS) in groundwater at the Site. The monitor well will be installed about 500 feet southeast (down gradient) of wells MW-9 and MW-9A. The well will be drilled to the top of the Triassic-age redbed, approximately 165 feet below ground surface (BGS). Drilling will be performed using a truck-mounted rotary drilling rig. The well will fully screen the Ogallala aquifer and will be completed with 4-inch diameter schedule 40 PVC casing and screen. The well screen, approximately 40 feet in length, will be gravel packed from the base of the well to approximately 3 to 5 feet above the screen using graded silica sand. The well will be developed following installation by purging with a bailer. The purged water will be contained in a portable tank or drums and disposed at an OCD approved Class II injection or disposal well.

After the well has stabilized, groundwater samples will be collected and analyzed for major anions and cations. The groundwater samples will be collected using an electric submersible pump. Initially, the pump will be lowered to the upper part of the aquifer, approximately 5-10 feet below the water table and groundwater samples will be collected under low-flow conditions. Then, the pump will be lowered to near the bottom of the well and samples will be collected from the base of the aquifer. The samples will be delivered to the laboratory under chain-of-custody control. The sample results will be reviewed upon receipt of the laboratory report and submitted to the New Mexico Oil Conservation Commission (OCD).

Mr. William C. Olson
November 18, 1998
Page 2

On November 12, 1998, the OCD also approved Texaco's request to modify the schedule for groundwater monitoring to include semi-annual and annual monitoring. Groundwater samples will be collected twice yearly (semi-annual) from down gradient monitor wells MW-8, MW-9, MW-9A, MW-10 and MW-11 (new), and yearly (once annually) from the remaining wells, following remediation system startup.

I feel this correctly summarizes our discussion. Please call if you have any questions.

Sincerely,
Highlander Environmental Corp.



Mark J. Larson
Senior Project Manager

cc: Rodney Bailey, Texaco
Wayne Price, OCD-Hobbs District





STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

September 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. 7-274-520-559

Mr. Rodney Bailey
Texaco E&P Inc.
205 E. Bender
Hobbs, New Mexico 88240

**RE: COOPER-JAL UNIT
LEA COUNTY, NEW MEXICO**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has reviewed Texaco Exploration & Development's (Texaco) June 12, 1998 "SUBSURFACE ENVIRONMENTAL ASSESSMENT REPORT, TEXACO EXPLORATION AND PRODUCTION, INC., COOPER-JAL UNIT SOUTH INJECTION STATION, LEA COUNTY, NEW MEXICO". This document which was submitted on behalf of Texaco by their consultant Highlander Environmental Corp. contains the results of Texaco's investigation of the extent of ground water contamination related to an unlined emergency pit at the Cooper-Jal Unit South Injection Station located in Unit J, Section 24, T24S, R36E NMPM, Lea County, New Mexico. The document also contains Texaco's recommended ground water remediation plan.

The investigation work conducted to date is satisfactory and the remediation recommendations are approved with the following conditions:

1. Texaco will submit a work plan to complete the definition of the extent of ground water contamination which is in excess of New Mexico Water Quality Control Commission standards.
2. Texaco will notify the OCD at least 1 week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve Texaco of liability should the investigation actions fail to adequately define the extent of contamination related to Texaco's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve Texaco of responsibility for compliance with any other federal, state or local laws and regulations.

Mr. Rodney G. Bailey
September 17, 1998
Page 2

If you have any questions, please contact me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Hobbs Office
Mark J. Larson, Highlander Environmental Corp.

Z 274 520 559

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (*See reverse*)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 16, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-234

Mr. Rodney Bailey
Texaco E&P Inc.
205 E. Bender
Hobbs, New Mexico 88240

**RE: COOPER-JAL UNIT
LEA COUNTY, NEW MEXICO**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) has reviewed Texaco Exploration & Development's (TEXACO) October 10, 1997 "PRELIMINARY INVESTIGATION FINDINGS, NOTIFICATION OF RELEASE AND PROPOSED ADDITIONAL INVESTIGATIONS, EMERGENCY OVERFLOW PIT (CLOSED), TEXACO EXPLORATION AND PRODUCTION, INC., COOPER-JAL UNIT SOUTH INJECTION STATION AND TANK BATTERY, NW/4, SE/4, SECTION 24, TOWNSHIP 24 SOUTH, RANGE 36 EAST, LEA COUNTY, NEW MEXICO". This document which was submitted on behalf of TEXACO by their consultant Highlander Environmental Corp. contains TEXACO's work plan for investigating the extent of ground water contamination related to an unlined emergency pit at the Cooper-Jal Unit South Injection Station located in Unit J, Section 24, T24S, R36E NMPM, Lea County, New Mexico.

The above referenced work plan is approved with the following conditions:

1. Due to the apparent presence of a salt density driven plume, the OCD requires that TEXACO install shallow and deep nested monitor wells at each location.
 - a. The shallow nested monitoring wells will be constructed with 15 feet of well screen, with 10 feet of screen below the top of the water table and 5 feet of screen above the water table. The remainder of the well will be constructed as outlined in the above referenced work plan.

Mr. Rodney G. Bailey
December 16, 1997
Page 2

- b. The deep nested monitoring wells will be constructed with 10 feet of well screen placed directly on the top of the red beds. The remainder of the well will be constructed as outlined in the above referenced work plan.
2. TEXACO will sample and analyze ground water from all monitor wells for benzene, toluene, ethylbenzene and xylene (BTEX), major cations and anions, total dissolved solids (TDS), WQCC metals and polynuclear aromatic hydrocarbons (PAH) using EPA approved methods and quality assurance/quality control (QA/QC).
3. All wastes generated will be disposed of at an OCD approved facility.
4. TEXACO will submit a comprehensive report on all of the investigations to the OCD by March 13, 1998. The report will be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report will contain:
 - a. A description of all past and present investigation activities including conclusions and recommendations.
 - b. A summary of all past and present soil and water quality sampling results including copies of the laboratory analytical data sheets and associated QA/QC data.
 - c. Geologic logs and well completion diagrams for all past and present monitor wells and boreholes.
 - d. A site map showing the location of all monitor wells, boreholes and relevant site features.
 - e. A water table elevation map constructed using the water table elevation of ground water in all site monitor wells.
5. TEXACO will notify the OCD at least 1 week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not relieve TEXACO of liability should the investigation actions fail to adequately define the extent of contamination related to TEXACO's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve TEXACO of responsibility for compliance with any other federal, state or local laws and regulations.

Mr. Rodney G. Bailey
December 16, 1997
Page 3

If you have any questions, please contact me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Wayne Price, OCD Hobbs Office
Mark J. Larson, Highlander Environmental Corp.

P 410 431 234

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

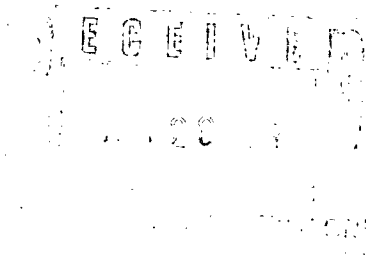


Highlander Environmental Corp.

Midland, Texas

April 16, 1998

Mr. William C. Olson, Hydrogeologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
2040 S. Pacheco
Santa Fe, New Mexico 87505



**Re: Request for Extension for Continuance of Subsurface Investigation, Texaco
Exploration & Production, Inc., Cooper-Jal Unit South Injection Station,
Lea County, New Mexico**

Dear Mr. Olson:

This letter is written on behalf of Texaco Exploration & Production, Inc. (Texaco) and confirms our telephone conversation of April 15, 1998, regarding a time extension request for completion of investigations associated with the above-referenced matter. Highlander Environmental Corp. (Highlander) has been retained by Texaco to conduct the investigations.

Highlander has completed its initial investigations conducted in accordance with its work plan titled, "Preliminary Investigation Findings, Notification of Release and Proposed Additional Investigations, Emergency Overflow Pit (Closed), Texaco Exploration and Production, Inc., Cooper-Jal Unit South Injection Station and Tank Battery, NW/4, SE/4, Section 24, Township 24 South, Range 36 East, Lea County, New Mexico" (October 10, 1997). The New Mexico Oil Conservation Division (OCD) conditionally approved the work plan on December 16, 1997. The OCD requested that a report be submitted to the OCD by March 13, 1998. Due to the drilling contractor's schedule and receipt of data from the analytical laboratory, Highlander requested a thirty (30) day extension for submittal of the report. The extension was verbally approved by the OCD on March 9, 1998. Currently, Highlander has completed its investigations and has determined that additional investigations are required to determine the extent of impact to groundwater.

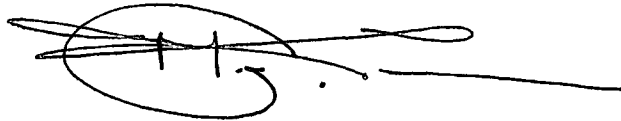
Per our April 15, 1998 telephone conversation, Highlander requests a sixty (60) day extension to complete the additional investigations. The additional investigations may include electromagnetic (EM-34) terrain conductivity surveying south and east of the Cooper-Jal South Injection Station, drilling and installation of groundwater monitoring wells, and collection and analysis of groundwater samples. Since it appears that the impact is principally associated with the deeper portion of the groundwater Mr.

William C. Olson
April 16, 1998
Page 2

system, the additional wells, if installed, will be constructed as deep wells with approximately 10 feet of well screen placed directly on top of the red beds. The remainder of the well will be constructed as outlined in the work plan dated October 10, 1997.

Highlander appreciates your consideration of this request. Please call if you have questions.

Sincerely,
Highlander Environmental Corp.

A handwritten signature in black ink, appearing to read 'Mark J. Larson', with a large circular flourish on the left side.

Mark J. Larson
Senior Project Manager

cc: Mr. Rodney Bailey, Texaco
Mr. Wayne Price, OCD-Hobbs District





Highlander Environmental Corp.

Midland, Texas

June 12, 1998

Mr. William C. Olson, Hydrogeologist
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RECEIVED

JUN 15 1998

**ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION**

**Re: Subsurface Environmental Assessment Report, Texaco Exploration and
Production, Inc., Cooper-Jal Unit South Injection Station, Lea County, New
Mexico**

Dear Mr. Olson:

On behalf of Texaco Exploration and Production, Inc. (Texaco) please
find enclosed one copy of the above-referenced report. The report documents
subsurface environmental assessment activities conducted by Highlander
Environmental Corp. (Highlander) at the Cooper-Jal Unit South Injection Station,
Lea County, New Mexico.

Please call if you have any questions.

Sincerely,
Highlander Environmental Corp.

Mark J. Larson
Senior Project Manager

Encl.

cc: Rodney Bailey, Texaco Exploration and Production, Inc.
Wayne Price, OCD - Hobbs District

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES

Attention: Ike Tavaréz
1910 N. Big Spring St.
Midland, TX 79705

September 11, 1997
Receiving Date: 08/26/97
Sample Type: Soil
Project No: NA
Project Location: Lea County, NM


Prep Date: 09/08/97
Analysis Date: 09/08/97
Sampling Date: 08/22/97
Sample Condition: Intact & Cool
Sample Received by: JH
Client/Project: Texaco Cooper-
Removal Central TB

TA#	FIELD CODE	CHLORIDE (mg/kg)
T80357	BH-1 (90-92')	770
T80358	BH-2 (100-102')	750
QC	Quality Control	26

Reporting Limit 20

RPD 0
% Extraction Accuracy 102
% Instrument Accuracy 102

METHODS: EPA 300.0.
CHEMIST: RC
CHLORIDE SPIKE: 25 mg/kg Chloride.
CHLORIDE QC: 25 mg/L CHLORIDE.



Director, Dr. Blair Leftwich

9-11-97

DATE

PAGE: 1 OF: 2

ANALYSIS REQUEST

(Circle or Specify Method No.)

HIGHLANDER ENVIRONMENTAL CORP.

Midland, Texas 79705

Fax (915) 682-3946

[illegible]

Please Fill out all copies - Project Manager retains White copy - Accounting receives Pink copy - Lab retains Yellow copy Return Gold copy to Highlander Environmental Corp.

10 samples - #5

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(915) 682-4559

Fax (915) 682-3946

CLIENT NAME: TEXACO		SITE MANAGER: KE Lawrence	
PROJECT NO.: TEXACO Canyon - Tail Pondal TB		PRESERVATIVE METHOD	
PROJECT NAME: TEXACO Canyon - Tail Pondal TB		HCL	
SAMPLE IDENTIFICATION: Leban County, NM.		HNO3	
DATE: 8/22/97		ICE	
TIME: 10:00-10:20		NONE	
LAB I.D. NUMBER	DATE	TIME	NUMBER OF CONTAINERS
5	8/22/97	10:00-10:20	1
5	8/22/97	10:00-10:20	1

PAGE: **2** OF: **2**

ANALYSIS REQUEST
(Circle or Specify Method No.)

TEXACO	MTBE 8020/602	PAH 8270	Total Metals Ag As Ba Cd Cr Pb Hg Se	TCLP Volatiles	TCLP Semi Volatiles	RCI	GC/MS Vol. 8240/8260/624	GC/MS Semi. Vol. 8270/625	PCB's 8080/608	Pest. 808/608	BOD, TSS, pH, TDS, Chloride	Gamma Spec.	Alpha Beta (Air)	PLM (Asbestos)	Chloride
--------	---------------	----------	--------------------------------------	----------------	---------------------	-----	--------------------------	---------------------------	----------------	---------------	-----------------------------	-------------	------------------	----------------	-----------------

RELINQUISHED BY: (Signature) Smiley Ward	Date: 8/25/97	Time: 10:00 AM	RECEIVED BY: (Signature) KE Lawrence	Date: 8/25/97	Time: 10:00 AM
RELINQUISHED BY: (Signature)	Date:	Time:	RECEIVED BY: (Signature)	Date:	Time:
RELINQUISHED BY: (Signature)	Date:	Time:	RECEIVED BY: (Signature)	Date:	Time:
RECEIVING LABORATORY:			RECEIVED BY: (Signature)		
ADDRESS:			DATE:		
CITY:			TIME:		
STATE:			DATE:		
PHONE:			TIME:		
ZIP:			DATE:		
MATRIX:			DATE:		
SAMPLE CONDITION WHEN RECEIVED:			DATE:		

HIGHLANDER CONTACT PERSON: KE Lawrence	
FEDEX	AIRBILL #
HAND DELIVERED	OTHER:
RESULTS BY:	
RUSH CHARGES AUTHORIZED:	Yes No

Please fill out all copies - Project Manager retains White copy - Accounting receives Pink copy - Lab retains Yellow copy Return Gold copy to Highlander Environmental Corp.

3 samples - HS

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES
Attention: Ike Tavaréz
1910 N. Big Spring St.
Midland, TX 79705

September 29, 1997
Receiving Date: 09/16/97
Sample Type: Soil
Project No: NA
Project Location: Lea Co., NM

Prep Date: 09/26/97
Analysis Date: 09/26/97
Sampling Date: 09/09/97
Sample Condition: Intact & Cool
Sample Received by: JH
Client Name: Texaco E & P
Project Name: Texaco Cooper-Jal
Central TB

TA#	FIELD CODE	CHLORIDE (mg/kg)
T81670	B11-1 (110-112')	500
T81671	B11-1 (120-122')	540
T81672	B11-1 (130-132')	1,200
T81673	B11-1 (140-142')	210
QC	Quality Control	20.9
REPORTING LIMIT		20
RPD		2
% Extraction Accuracy		85
% Instrument Accuracy		88*

METHODS: EPA 300.0.
CHEMIST: RC
CHLORIDE SPIKE: 25 mg/kg CHLORIDE.
CHLORIDE QC: 22 mg/L CHLORIDE.



Director, Dr. Blair Leftwich

9-29-97

DATE

251

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(915) 682-4559

Fax (915) 682-3946

CLIENT NAME:

SITE MANAGER:

PROJECT NO.:	PROJECT NAME:
--------------	---------------

PROJECT NAME: Hydroponic Jell-O, 1.017E.

LAB I.D. NUMBER	DATE	TIME	MATRIX	COMP.	GRAB
--------------------	------	------	--------	-------	------

SAMPLE IDENTIFICATION

	FILTERED (Y/N)
	NUMBER OF CONTAINERS

PRESERVATIVE METHOD	HCL
	HNO3
	ICE
	NONE

[illegible]

RELINQUISHED BY: (Signature)

Date: 6/13/99
Time: 3:55 PM

RECEIVED BY: (Signature)

RELINQUISHED BY: (Signature)

Date: 9-15-97
Time: 6:30 PM

RECEIVED BY: (Signature)

RELINQUISHED BY: (Signature)

Date: _____
Time: _____

RECEIVED BY: (Signature)

RECEIVING LABORATORY: _____
ADDRESS: _____

72

RECEIVED BY: (Signature)

CITY: _____ ST: _____
CONTACT: _____

ZIP: _____

DATE: 9/16/97

SAMPLE CONDITION WHEN RECEIVED:

MATRIX:

W-Water	A-Air	SD-Solid
	SI-Sludge	O-Other
S-Soil		

REMARKS:

SAMPLED BY: (Print & Sign)

SAMPLE SHIPPED BY: (Circle)
FEDEX **BUS**

HAND DELIVERED	UPS

HIGHLANDER CONTACT PERSON:

45

2

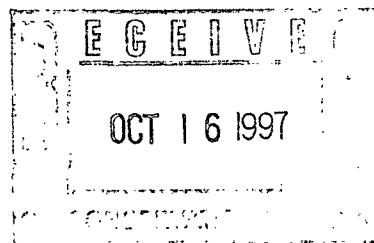
70650



Highlander Environmental Corp.

Midland, Texas

October 10, 1997



Mr. William C. Olson
Environmental Bureau
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: Preliminary Investigation Findings, Notification of Release and Proposed Additional Investigations, Emergency Overflow Pit (Closed), Texaco Exploration and Production, Inc., Cooper-Jal Unit South Injection Station and Tank Battery, NW/4, SE/4, Section 24, Township 24 South, Range 36 East, Lea County, New Mexico

Dear Mr. Olson:

Highlander Environmental Corp. (Highlander) has been retained by Texaco Exploration and Production, Inc. (Texaco) to conduct a preliminary subsurface investigation of a former emergency overflow pit at the Cooper-Jal Unit South Injection Station (Site), located approximately six (6) miles northwest of Jal, New Mexico. The Site is situated in the northwest quarter (NW/4) of the SE/4, Section 24, Township 24 South, Range 37 East, Lea County, New Mexico.

Background

The Site is currently the location of an oil and gas field tank battery and injection station. Previously, the Site included an unlined earthen emergency produced water overflow pit, which measured approximately 50' x 170' x 12'. The pit was operated until its closure in August 1996. Prior to closure, an assessment was performed by Environmental Spill Control, Inc., Hobbs, New Mexico. The purpose of the assessment was to conduct a preliminary subsurface evaluation to determine the horizontal and vertical extent of hydrocarbon impact. The assessment consisted of drilling five (5) boreholes in and adjacent to the pit, and collection of soil samples for laboratory testing. The boreholes were drilled between 15 and 100 feet below ground level (BGL), and soil samples were collected and analyzed for total petroleum hydrocarbons (TPH). The highest TPH concentration reported was 14,890 parts per million (ppm) from a shallow sample obtained near the southern one-half of the pit. The soil samples were also analyzed for benzene, toluene, ethylbenzene, and xylenes (collectively referred to as BTEX), and reported no levels above the test method detection limits. A sample was also tested for RCRA metals by Toxicity Characteristic Leaching Procedure (TCLP), and reported no concentrations above the test method detection limits. The results were reported to Texaco on October 14, 1993.

Closure of the pit began on August 1, 1996. Approximately 1,248 cubic yards of affected soil was removed from the pit and transferred to Parabo, Inc., Eunice, New Mexico for disposal. Soil samples from the bottom of the excavation were analyzed for TPH to confirm that all impacted soil had been removed. Approximately 1,091 cubic yards of clay was placed in the base of the excavation as a "buffer zone", and 3,360 cubic yards of caliche was placed over the clay and backfilled to grade. On August 30, 1996, WEC issued a closure (letter) report.

On December 13, 1996, a pit closure report was submitted to the Oil Conservation Division (OCD), and on January 17, 1997 and July 10, 1997, the OCD requested Texaco to submit additional information, including an evaluation of the vertical extent of salt migration. On July 17, 1997, Texaco submitted additional information, except information pertaining to the vertical salt migration, which was not available.

Preliminary Subsurface Investigation

On August 22, 1997, Highlander personnel supervised drilling of a borehole adjacent to the southeast corner of the pit. The borehole was drilled to an approximate depth of 100 feet BGL, and soil samples were collected from 15'-17' feet BGL, and every ten (10) feet thereafter (i.e., 20'-22', 30'-32', 40'-42', etc.). The samples were analyzed for chloride and reported concentrations from 580 milligrams per kilogram (mg/kg) from 15'-17' to 2,500 mg/kg from 80'-82'. The chloride levels below 82 feet BGL varied in concentration from 540 mg/kg (120'-122') to 1,200 mg/kg (130'-132'). Table 1 presents a summary of the laboratory test results. Appendix A presents the laboratory data reports.

On September 9-10, 1997, additional soil samples collected to 173 feet BGL to further delineate the vertical extent of chloride migration. Groundwater was observed at approximately 142 feet BGL and shale (red bed) was encountered at 173 feet BGL. The soil samples were collected every ten feet (i.e., 110'-112', 120'-122', 130'-132' and 140'-142'), and chloride concentrations ranged from 500 mg/kg (110'-112' BGL) to 1,200 mg/kg (130'-132'). The chloride level in the sample from 140'-142' BGL was 210 mg/kg, and indicated that groundwater had been encountered. The soil samples were visually examined for lithology, and a borehole sample log was prepared (Appendix B).

On September 10, 1997, borehole BH was completed as a groundwater monitoring well (MW-1), and a groundwater sample was collected and analyzed for major ions and cations. The chloride level in the groundwater sample was 8,500 milligrams per liter (mg/L) and exceeded the New Mexico Water Quality Control Commission (WQCC) standard of 250 mg/L (20 NMAC 6.2, 3103 B). The TDS level was 15,000 mg/L. Appendix A presents the laboratory report. Appendix B presents the monitoring well construction record.



Proposed Investigation

Highlander proposes to conduct an electromagnetic (EM-34) terrain conductivity survey to evaluate the area of elevated chloride in soil and groundwater. The EM-34 measures the conductivity of soil and groundwater by imparting an alternating electrical current to a transmitter coil which is positioned near the earth's surface. The magnetic field produced as the current passes through the transmitter coil induces small electrical currents into the subsurface soil. The electrical currents produce a secondary magnetic field which is sensed with the primary magnetic field by a receiver coil. The terrain conductivity which is linearly proportional to the ratio of the secondary magnetic field to the primary magnetic field is displayed on an analog scale in millimhos/meter (mmhos/m). The EM-34 has an effective depth of investigation of approximately 200 feet BGL. The EM-34 survey will be conducted using a grid station approach. A 50' x 50' grid network will be established across the Site and measurements will be collected at each grid intersection. A background station will also be established and compared to Site measurements.

Based on the EM-34 survey results, a minimum of three (3) additional monitor wells may be installed to evaluate the extent of the chloride impact. The wells will be drilled to the top of the red bed (shale) using a truck-mounted rotary drill rig. The monitor wells will be constructed using two (2) inch diameter schedule 40 PVC threaded casing and factory slotted screen. The well screen, approximately forty (40) feet in length, will be placed across the entire saturated thickness of the groundwater interval. The well screen will be surrounded with a graded silica sand to a depth approximately 2 feet above the screen. A layer of bentonite pellets, approximately 2-4 feet thick, will be placed in the borehole above the sand pack and hydrated with potable water. The remainder of the borehole will be filled with cement and bentonite grout to about one (1) foot below ground. The wells will be secured with locking steel protectors anchored in a concrete pad measuring approximately 3 feet by 3 feet. The wells will be surveyed by a New Mexico registered land surveyor to determine the approximate ground and top of casing elevations.

Following installation, the wells will be developed by pumping with an electric submersible pump. Water removed from the wells will be placed in an appropriate container (i.e., 55-gallon drums, portable tank, etc.) until disposed is arranged. Groundwater samples will be collected and analyzed for anions, cations, and TDS. Groundwater samples will be delivered to the laboratory via overnight delivery and under chain of custody control. Soil samples may also be collected from a background location and analyzed for chloride.

Highlander will conduct an inventory of water wells within 1-mile radius of the Site for the purpose of identifying possible receptors. The water well search will include a review of records available from the New Mexico State Engineer's Office and visual survey.



Mr. William C. Olson
October 10, 1997
Page 4

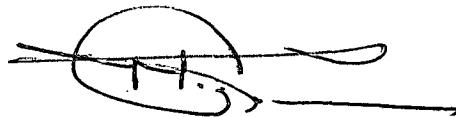
All down hole equipment associated with the investigation (i.e., drill rods, bit, water level indicator, submersible pump, etc.) will be thoroughly decontaminated between wells. Soil cuttings from drilling will be stockpiled next to the borehole until disposal is arranged.

Data Evaluation and Reporting

Upon receipt of analytical data from the laboratory, Highlander will assemble all data in tables for presentation in a report. The report will contain discussions of field sampling techniques and laboratory results. Highlander will compare the laboratory test results for soil and groundwater samples to applicable New Mexico OCD or WQCC action levels or cleanup standards. The report will also present a discussion of the EM-34 survey and findings. Detailed Site drawings will be presented in the report, and may include the EM-34 survey results, groundwater potentiometric surface contours, depth-to-groundwater and chloride concentrations.

Highlander will schedule the proposed field activities following your review and approval. Please call if you have questions.

Sincerely,
Highlander Environmental Corp.

A handwritten signature in black ink, appearing to read 'M. J. Larson', with a large, stylized loop at the end.

Mark J. Larson
Senior Project Manager

Encl.

cc: Mr. Rodney Bailey, TEPI
Mr. Robert Browning, TEPI
Mr. Wayne Price, OCD-Hobbs District



TABLES

**Table 1: Summary of Laboratory Analysis of Soil Samples,
Texaco Exploration and Production, Inc.,
Cooper-Jal South Injection Station Emergency Overflow Pit,
Lea County, New Mexico**

Borehole Number	Sample Date	Sample Depth, Feet BGL	Chloride mg/kg
BH-1	8/22/97	15-17	580
		20-22	970
		30-32	580
		40-42	1,800
		50-52	1,400
		60-62	1,300
		70-72	1,100
		80-82	2,500
		90-92	770
		100-102	750
BH-11-1	9/09/97	110-112	500
		120-122	540
		130-132	1,200
		140-142	210

Notes:

1. BGL: Denotes sample depth in feet below ground
2. mg/kg: Denotes concentration in milligrams per killogram

APPENDIX A

Laboratory Reports

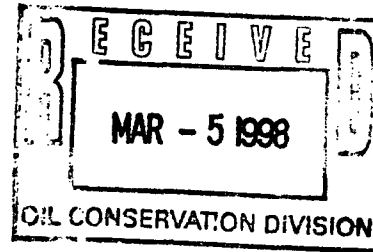


Highlander Environmental Corp.

Midland, Texas

March 2, 1998

Mr. William C. Olson, Hydrogeologist
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505



Re: Request for Extension for Report Submittal, Texaco Exploration and Production, Inc., G. L. Erwin "A&B" Federal NCT-2 Tank Battery and Cooper-Jal Unit South Injection Station, Lea County, New Mexico

Dear Mr. Olson:

Highlander Environmental Corp. (Highlander) has been retained by Texaco Exploration and Production, Inc. (Texaco) to conduct subsurface investigations at the above-referenced facilities (Sites). The investigations are being conducted in accordance with work plans approved by the New Mexico Oil Conservation Division (OCD), which requires submittal of a final report by March 1, 1998, for the G. L. Erwin Site and March 13, 1998, for the Cooper-Jal Unit.

As of February 28, 1998, Highlander has completed the fieldwork associated with the Sites. However, the laboratory analysis is not complete, therefore, it is necessary to request extensions for submittal of the final reports. Highlander requests an extension of 30 days from the deadline for each Site in order to receive and evaluate the laboratory data, and prepare the reports. The final report for the G. L. Erwin Site will be submitted by April 1, 1998 and by April 13, 1998 for the Cooper-Jal Site.

Highlander appreciates your consideration of this request. Please call if you have any questions.

3/10/98, 1420 hrs
Verbal approval
to Mark Larson
Will Olson

Sincerely,
Highlander Environmental Corp.

Mark J. Larson
Senior Project Manager

cc: Rodney Bailey, Texaco Exploration and Production, Inc.

SAMPLE LOG

Boring/Well: MW-1
Client: Texaco Exploration and Production, Inc.
Project: Texaco / Cooper-Jal Central Tank Battery
Total Depth: 173 feet
Date Installed: 9/9/97 - 9/10/97

DEPTH (Ft)	SAMPLE DESCRIPTION
0-5	Top soil, brown, fine grain sand, loose soil, some traces of clay matrix
5-10	Tan, fine grain sand, loose, some traces of caliche, clay encountered at 8.0'
10-15	80% clay material matrix, and 20 % tan, fine grain sand, loose
15-20	90% tan, fine grain sand, loose, and 10% white caliche, friable
20-30	90% tan, fine grain sand, loose, and 10% white caliche, friable
30-35	Caliche and limestone layer, dense formation, trace of fine grain sand
35-40	Tan, fine grain sand, clean, loose
40-50	Tan, fine grain sand, clean, loose
50-60	Tan, fine grain sand, clean, loose, some nodules of white caliche, friable
60-70	Tan, fine grain sand, clean, loose
70-80	Tan, fine grain sand, clean, loose, traces of white caliche layers, some dense
80-90	Tan, fine grain sand, clean, loose, traces of white caliche layers, friable, some dense
90-100	Tan, fine grain sand, clean, loose, traces of white caliche layers and cemented sandstone, damp
100-110	Tan, fine grain sand, clean, loose, traces of white caliche layers, damp
110-120	Tan, fine grain sand, clean, loose, traces of white caliche layers and cemented sandstone, damp
120-130	Tan, fine grain sand, clean, loose, traces of white caliche layers and cemented sandstone, damp
130-140	Tan, fine grain sand, clean, loose, traces of white caliche layers and cemented sandstone, damp
140-150	Tan, fine grain sand, clean, loose, traces of cemented sandstone, moist at 140 '
150-160	Tan, fine grain sand, clean, loose, traces of layered cemented sandstone
160-170	Tan, fine grain sand, clean, loose, traces of thin layered cemented sandstone
170-173	Tan, fine grain sand, clean, loose, traces thin layers of cemented sandstone, redbed encountered at 173.0'
173	Redbed



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

January 17, 1996

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

Paula S. Ives
Engineering Assistant
Texaco E&P Inc. (TEPI)
205 E. Bender
Hobbs, NM 88240

Re: Pit Closure-Cooper Jal Unit Injection Station.
J-sec24-Ts24s-R36e.

Attention: Paula Ives

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the pit closure form dated 12/13/96 submitted for the above referenced facility.

In order for the NMOCD to properly evaluate this closure please provide the following information.

1. Laboratory and/or field data sheets for the bottom hole and final remediated soil samples required per NMOCD guidelines.
2. Please verify the actual depth to ground water. This information can be obtained from the NM St. Engr's office located in Roswell, NM. (505-622-6521).
3. Please provide documentation for all contaminated soils shipped off-site. Please include quantities, manifest, invoices, etc.
4. Please provide information on the bottom hole clay liner, such as type, thickness, compaction data, hydraulic conductivity, etc.
5. Provide any other pertinent information such as pictures, field logs, etc.
6. Since this pit was an emergency overflow which was designed to primarily hold "produced oilfield waters", did TEPI evaluate the vertical extent of the salt migration.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,

Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Bill Olson-NMOCD Hydrogeologist-Environmental Bureau

NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT

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

Paula S. Ives
Engineering Assistant
Texaco E&P Inc.
205 E. Bender
Hobbs, NM 88240

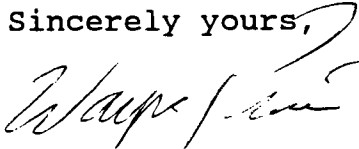
Re: C-103 Pit Closure

Attention: Paula S. Ives,

Please find enclosed the "OCD Approval Conditions" and "Pit Closure Form" attached to the recent C-103 submitted by you for a pit closure in unit j section 24-Ts 24s-R 36e Cooper Jal Unit South Injection Station. These conditions are hereby incorporated into your approval process.

If you require any further assistance concerning this matter please do not hesitate to call (505-393-6161) or write.

Sincerely yours,



Wayne Price-Environmental Engineer

cc: Jerry Sexton-NMOCD District I Supervisor
Bill Olson-NMOCD Hydrogeologist-Environmental Bureau
Paul Kautz-Geologist

attachments-1 approval conditions
1 Pit Closure form.

DISTRICT I

P.O. Box 1980, Hobbs, NM 88240

DISTRICT II

P.O. Box Drawer DD, Artesia, NM 88210

DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

WELL API NO.

5. Indicate Type of Lease

STATE ☐

FEE ☒

6. State Oil / Gas Lease No.

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

1. Type of Well: OIL WELL ☐ GAS WELL ☐ OTHER Emerg. Overflow Pit

2. Name of Operator
TEXACO EXPLORATION & PRODUCTION INC.

3. Address of Operator
205 E. Bender, HOBBS, NM 88240

7. Lease Name or Unit Agreement Name
COOPER JAL UNIT SOUTH INJECTION
STATION

8. Well No.

9. Pool Name or Wildcat

4. Well Location

Unit Letter J : Feet From The _____ Line and _____ Feet From The _____ Line

Section 24 Township 24S Range 36E NMPM _____ Lea COUNTY

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

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

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☒

PLUG AND ABANDON ☐

TEMPORARILY ABANDON ☐

CHANGE PLANS ☐

PULL OR ALTER CASING ☐

OTHER: _____ ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☐

ALTERING CASING ☐

COMMENCE DRILLING OPERATION ☐

PLUG AND ABANDONMENT ☐

CASING TEST AND CEMENT JOB ☐

OTHER: _____ ☐

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

It is our intent to remediate the emergency overflow pit which is associated with the Cooper Jal Unit, South Injection Station. The pit is an unlined earthen pit, approximately 50 feet X 170 feet. We intent to excavate 10 feet deep, approximately 200 cubic yards of contaminated soil out of the pit and use vertical mixing and dilution to lower the TPH under the OCD guidelines of 5,000 ppm. It is well in excess of 100 feet to ground water.

JUL 23 1996
OCD HOBBS
OFFICE
By LWP From BP

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

SIGNATURE Paula S. Ives TITLE Engineering Assistant

DATE 7/1/96

TYPE OR PRINT NAME Paula S. Ives

Telephone No. 397-0432

Orig. Signed by
Paul Kautz
Geologist

APPROVED BY _____ TITLE _____

DATE _____

CONDITIONS OF APPROVAL, IF ANY:

OCD APPROVAL CONDITIONS FOR RCRA EXEMPT
UNLINED PIT CLOSURES - N

OCD APPROVAL CONDITIONS
FOR
RCRA EXEMPT
UNLINED PIT CLOSURES

1. The following closure actions will be performed in accordance with OCD's February 1993 "SURFACE IMPOUNDMENT CLOSURE GUIDELINES":
 - a. Vertical and horizontal extent of contamination will be determined either prior to, during or upon completion of remedial actions.
 - b. Contaminated soils will be remediated to the OCD's recommended levels or a risk assessment will be provided which shows that an alternate cleanup level is protective of surface water, ground water, human health and the environment.
 - c. Final soil contaminant concentrations will be determined upon completion of remedial actions.
 - d. Soil samples for verification of completion of remedial actions will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons.
2. All wastes removed from a specific site will be disposed of at an OCD approved facility.
3. The OCD Santa Fe Office's Environmental Bureau Chief and the OCD Hobbs District Office will be notified within 24 hours of the discovery of ground water contamination related to a pit closure.
4. Upon completion of all closure activities, a completed OCD "Pit Remediation and Closure Report" form containing the results of all pit closure and soil remediation activities will be submitted to the OCD for approval. The report will include the concentrations and application rates of any materials or additives used to enhance bioremediation of the contaminants and the final concentrations of any soils landfarmed onsite or the final disposition of soils removed from the site . To simplify the approval process, the OCD requests that the final pit closure reports be submitted only upon completion of all closure activities including onsite remediation or landfarming of contaminated soils.
5. All original documents will be submitted to the OCD Hobbs Office for approval with copies provided to the OCD Santa Fe Office.
6. OCD approval does not relieve you of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if the closure activities fail to adequately remediate contamination related to your activities. In addition, OCD approval does not relieve you of responsibility for compliance with other federal, state or local laws and regulations.

DISTRICT I
P.O. Box 1940, Hobbs, NM
DISTRICT II
Drawer DD, Artesia, NM 88211
DISTRICT III
1000 Rio Brazos Rd. Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NM 87505

SUBMIT 1 COPY TO
APPROPRIATE
DISTRICT OFFICE
AND 1 COPY TO
SANTA FE OFFICE

(Revised 3/9/94)

PIT REMEDIATION AND CLOSURE REPORT

Operator: _____ Telephone: _____

Address: _____

Facility Or: _____
Well Name

Location: Unit or Qtr/Qtr Sec _____ Sec _____ T _____ R _____ County _____

Pit Type: Separator _____ Dehydrator _____ Other _____

Land Type: BLM _____, State _____, Fee _____, Other _____

Pit Location: Pit dimensions: length _____, width _____, depth _____
(attach diagram)

Reference: wellhead _____, other _____

Footage from reference: _____

Direction from reference: _____ Degrees _____ East North _____
of
_____ West South _____

Depth To Ground Water:
(Vertical distance from
contaminants to seasonal
high water elevation of
ground water)

Less than 50 feet (20 points)
50 feet to 99 feet (10 points)
Greater than 100 feet (0 Points) _____

Wellhead Protection Area:
(Less than 200 feet from a private
domestic water source, or; less than
1000 feet from all other water sources)

Yes (20 points)
No (0 points) _____

Distance To Surface Water:
(horizontal distance to perennial
lakes, ponds, rivers, streams, creeks,
irrigation canals and ditches)

Less than 200 feet (20 points)
200 feet to 1000 feet (10 points)
Greater than 1000 feet (0 points) _____

RANKING SCORE (TOTAL POINTS): _____

Submit 3 copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-103
Revised 1-1-89

DISTRICT I

P.O. Box 1980, Hobbs, NM 88240

DISTRICT II

P.O. Box Drawer DD, Artesia, NM 88210

DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION

852 P.O. Box 2088
Santa Fe, New Mexico 87504-2088

WELL API NO.

5. Indicate Type of Lease

STATE ☐

FEE ☒

6. State Oil / Gas Lease No.

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

1. Type of Well: OIL WELL ☐ GAS WELL ☐ OTHER ☐ Emerg. Overflow Pit

2. Name of Operator
TEXACO EXPLORATION & PRODUCTION INC.

3. Address of Operator
205 E. Bender, HOBBS, NM 88240

4. Well Location

Unit Letter J : Feet From The _____ Line and _____ Feet From The _____ Line

Section 24 Township 24S Range 36E NMPM _____ Lea COUNTY

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

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

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☒

PLUG AND ABANDON ☐

TEMPORARILY ABANDON ☐

CHANGE PLANS ☐

PULL OR ALTER CASING ☐

OTHER: _____ ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☐

ALTERING CASING ☐

COMMENCE DRILLING OPERATION ☐

PLUG AND ABANDONMENT ☐

CASING TEST AND CEMENT JOB ☐

OTHER: _____ ☐

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

It is our intent to remediate the emergency overflow pit which is associated with the Cooper Jal Unit, South Injection Station. The pit is an unlined earthen pit, approximately 50 feet X 170 feet. We intent to excavate 10 feet deep, approximately 200 cubic yards of contaminated soil out of the pit and use vertical mixing and dilution to lower the TPH under the OCD guidelines of 5,000 ppm. It is well in excess of 100 feet to ground water.

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

SIGNATURE Paula S. Ives TITLE Engineering Assistant

DATE 7/1/96

TYPE OR PRINT NAME Paula S. Ives

Telephone No. 397-0432

(This space for State Use)

APPROVED BY Paul S. Ives TITLE Geologist

DATE JUL 5 1996

CONDITIONS OF APPROVAL, IF ANY:

TRACE ANALYSIS, INC.

6701 Abercree Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR

HIGHLANDER SERVICES CORP.

Attention: Ike Tavaraz

1910 N. Big Spring Street

Midland, TX 79705

Prep Date: 09/19/97

Analysis Date: 09/22/97

Sampling Date: 09/16/97

Sample Condition: Intact & Cool

Sample Received by: JH

Project Name: Texaco E & P

September 24, 1997

Receiving Date: 09/18/97

Sample Type: Water

Project No: 996

Project Location: Texaco/Cooper-Jal Central Unit
Lea County

TA#	Field Code	POTASSIUM (mg/L)	MAGNESIUM (mg/L)	CALCIUM (mg/L)	SODIUM (mg/L)	HARDNESS
T81829	MW-1	50	630	520	4,300	3,900
QC	Quality Control	53	51	52	53	
METHOD BLANK						
Reporting Limit		<0.30			<0.40	
HIGH*		1.0	1.0	0.01	0.4	
		528-106%	528-106%		528-106%	
RPD		1	1	2	2	
% Extraction Accuracy		99	93	94	104	
% Instrument Accuracy		105	102	103	105	

*Note: High is out of limits of 95-105%.

METHODS: EPA SW 846-6010.

CHEMIST: RR

SPIKE: 100 mg/L POTASSIUM, MAGNESIUM, CALCIUM, SODIUM.

QC: 50 mg/L POTASSIUM, MAGNESIUM, CALCIUM, SODIUM.



Director, Dr. Blair Leftwich

9-24-97

Date

TRACE ANALYSIS, INC.

8701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1236

FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES CORP.

September 29, 1997

Receiving Date: 09/18/97

Sample Type: Water

Project No: 996

Project Location: Texaco/Cooper-Jal Central Unit
Lea County

Attention: Ike Tavares

1910 N. Big Spring Street

Midland, TX 79705

Prep Date: 09/18/97

Analysis Date: 09/18/97

Sampling Date: 09/16/97

Sample Condition: Intact & Cool

Sample Received by: JH

Project Name: Texaco E & P

TA#	FIELD CODE	pH (s.u.)	TDS (mg/L)	CHLORIDE (mg/L)	SULFATE (mg/L)	ALKALINITY (mg/L as CaCo3)
T81829	MW-1	7.1	15,000	8,500	1,100	280
QC	Quality Control	7.0	—	22	25	—

RPD

% Extraction Accuracy

% Instrument Accuracy

0	2	0	1	0
—	—	91	101	—
100	—	90	100	—

REPORTING LIMIT

50 50 1.00

METHODS: EPA 300.0, 310.1, 340.2, 150.1, 160.1.

CHEMIST: CHLORIDE/SULFATE/FLUORIDE: RC

SPIKE: 25 mg/L CHLORIDE; 25 mg/L SULFATE.

QC: 23 mg/L CHLORIDE; 25 mg/L SULFATE.

ALKALINITY/TDS/pH: JS

9-29-97

Director, Dr. Blair Leftwich

Date



TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424

806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR HIGHLANDER SERVICES CORP.

October 06, 1997
Receiving Date: 09/18/97
Sample Type: Water
Project No: 996
Project Location: Texaco/Cooper-Jal Central Unit
Lea County

Attention: Ike Tavaraz
1910 N. Big Spring Street
Midland, TX 79705

Prep Date: 10/02/97
Analysis Date: 10/02/97
Sampling Date: 09/16/97
Sample Condition: Intact & Cool
Sample Received by: JH
Project Name: Texaco E & P

TA#	Field Code	POTASSIUM (mg/L)	MAGNESIUM (mg/L)	CALCIUM (mg/L)	SODIUM (mg/L)	HARDNESS
T81829	MW-1	50	630	520	4,300	3,900
QC	Quality Control	52	51	52	51	

Reporting Limit

—

RPD
% Extraction Accuracy
% Instrument Accuracy

1
109
104

0
104
101

1
109
103

0
102
102

METHODS: EPA SW 846-6010.
CHEMIST: RR
SPIKE: 100 mg/L POTASSIUM, MAGNESIUM, CALCIUM, SODIUM.
QC: 50 mg/L POTASSIUM, MAGNESIUM, CALCIUM, SODIUM.

Director, Dr. Blair Leftwich

10-6-97

Date

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue

Lubbock, Texas 79424 806•794•1296

FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES CORP.

September 29, 1997
Receiving Date: 09/18/97
Sample Type: Water
Project No: 996

Prep Date: 09/18/97
Analysis Date: 09/18/97
Sampling Date: 09/16/97
Sample Condition: Intact & Cool
Sample Received by: JH
Project Name: Texaco E & P

Project Location: Texaco/Cooper-Jal Central Unit
Lea County

TA#	FIELD CODE	pH (s.u.)	TDS (mg/L)	CHLORIDE (mg/L)	SULFATE (mg/L)	ALKALINITY (mg/L as CaCo3)
T81829	MW-1	7.1	15,000	8,500	1,100	280
QC	Quality Control	7.0	—	22	25	—
RPD		0	2	0	1	0
% Extraction Accuracy		—	—	91	101	—
% Instrument Accuracy		100	—	90	100	—
REPORTING LIMIT		—	—	50	50	1.00

METHODS: EPA 300.0, 310.1, 340.2, 150.1, 160.1.
CHEMIST: CHLORIDE/SULFATE/FLUORIDE: RC ALKALINITY/TDS/pH: JS
SPIKE: 25 mg/L CHLORIDE; 25 mg/L SULFATE.
QC: 23 mg/L CHLORIDE; 25 mg/L SULFATE.

9-29-97

Director, Dr. Blair Leftwich

Date

303

PAGE: OF: /

OF:

PAGE: /

Analysis Request and Chain of Custody Record

HIGHLANDER ENVIRONMENTAL CORP.

1910 N. Big Spring St.
Midland, Texas 79705

(915) 682-4559

Fax (915) 682-3946

[illegible]

Please Fill out all copies - Project Manager retains White copy - Accounting receives Pink copy - Lab retains Yellow copy Return Gold copy to Highlander Environmental Corp.

ATTACHED SHEET FOR MAJOR LOGS

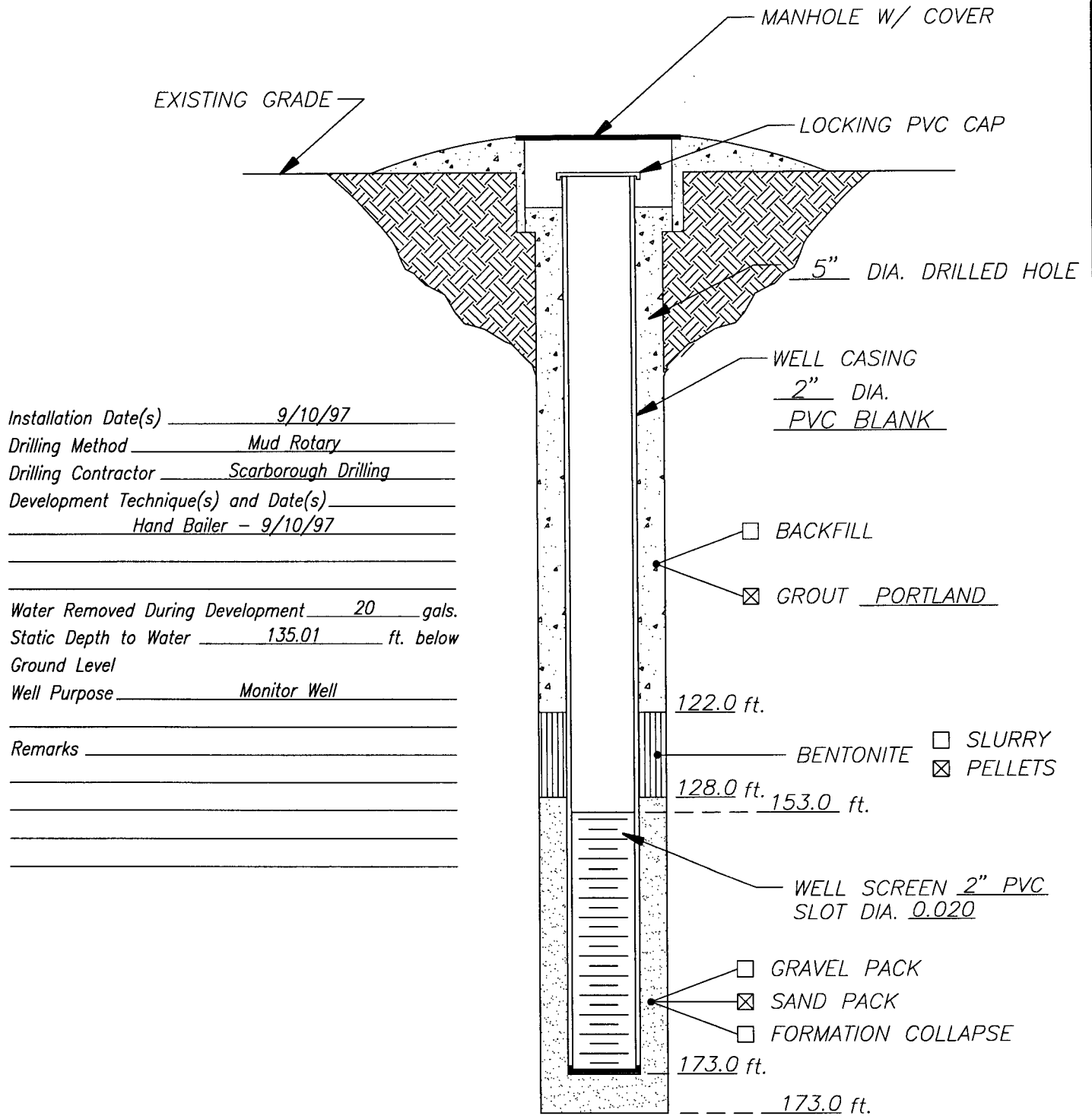
1 Sampler HS

HA102

APPENDIX B

Borehole Sample and Well Construction Logs

WELL CONSTRUCTION LOG



DATE: 9/10/97

*Highlander
Environmental*

CLIENT: *Texaco Exploration & Production, Inc.*

PROJECT: *Texaco Cooper-Jal Central Unit*

LOCATION: *Lea County, New Mexico*

WELL NO.

MW-1

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES
Attention: Ike Tavaréz
1910 N. Big Spring St.
Midland, TX 79705

August 28, 1997
Receiving Date: 08/26/97
Sample Type: Soil
Project No: NA
Project Location: Lea County, NM


Prep Date: 08/28/97
Analysis Date: 08/28/97
Sampling Date: 08/22/97
Sample Condition: Intact & Cool
Sample Received by: JH
Client/Project: Texaco Cooper-
Remov Jal Central TB

TA#	FIELD CODE	CHLORIDE (mg/kg)
T80349	BH-1 (15-17')	580
T80350	BH-1 (20-22')	970
T80351	BH-1 (30-32')	580
T80352	BH-1 (40-42')	1,800
T80353	BH-1 (50-52')	1,400
QC	Quality Control	510

Reporting Limit 0.5

RPD 2
% Extraction Accuracy 100
% Instrument Accuracy 102

METHODS: SM 4500 Cl-B.
CHEMIST: JS
CHLORIDE SPIKE: 10,000 mg/kg Chloride.
CHLORIDE QC: 500 mg/L CHLORIDE.



Director, Dr. Blair Leftwich

8-28-97

DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
HIGHLANDER SERVICES
Attention: Ike Tavaréz
1910 N. Big Spring St.
Midland, TX 79705

September 02, 1997
Receiving Date: 08/26/97
Sample Type: Soil
Project No: NA
Project Location: Lea County, NM

Prep Date: 08/29/97
Analysis Date: 08/29/97
Sampling Date: 08/22/97
Sample Condition: Intact & Cool
Sample Received by: JH
Client/Project: Texaco Cooper-
Removal Central TB

TA#	FIELD CODE	CHLORIDE (mg/kg)
T80354	BH-1 (60-62')	1,300
T80355	BH-1 (70-72')	1,100
T80356	BH-1 (80-82')	2,500
QC	Quality Control	504

Reporting Limit 0.5

RPD 3
% Extraction Accuracy 88
% Instrument Accuracy 100

METHODS: SM 4500 Cl-B.
CHEMIST: JS
CHLORIDE SPIKE: 10,000 mg/kg Chloride.
CHLORIDE QC: 500 mg/L CHLORIDE.



Director, Dr. Blair Leftwich

02 SEP 97
DATE


TRACE ANALYSIS, INC.

A Laboratory for Advanced Environmental Research and Analysis