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APPROVALS

YEAR(S):



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

April 5, 2001

CERTIFIED MAIL RETURN RECEIPT NO. 5051-4232

Mr. Bill Pierce Pierce Production Company P.O. Box 1969 Eunice, New Mexico 88231-1969

RE: CASE #1R0307

HOUSE #1 WELL SITE

Dear Mr. Pierce:

The New Mexico Oil Conservation Division (OCD) has reviewed Pierce Production Company's (PPC) January 8, 2001 correspondence titled "NOTIFICATION LETTERS – HOUSE #1, UNIT LETTER "D", SECTION 13-T20S-38E, LEA COUNTY, NEW MEXICO". This document is in response to the OCD's December 5, 2000 letter requiring PPC to perform a site investigation and submit a remediation plan for PPC's House #1 well site locate in Unit D, Section 13, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico.

The above-referenced document contains photographs and general assertions that no remediation is warranted at the site, but does not contain a site investigation plan nor a remediation plan as required. The rational presented in your correspondence is not acceptable because it does not contain any technical evidence regarding the extent of contamination at the site. OCD inspections of the site and PPC's photographs show that petroleum contaminated soils are present around the tank battery and production equipment areas. The adjacent resident, Mr. J.R. Brinkley has previously stated that during heavy rainfall events oily water has runoff the site onto his adjacent property. Therefore, the OCD requires that PPC submit a plan to investigate the extent of contamination related to PPC's activities. The plan shall include a description of all prior spills and waste disposal activities (including all former pits); and a site map showing the locations of the spills and waste disposal areas in relation to other site features. The plan shall be submitted to the OCD Santa Fe Office by May 5, 2001 with a copy provided to the OCD Hobbs District Office.

Mr. Bill Pierce April 5, 2001 Page 2

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

William C. Olson

Hydrologist

Environmental Bureau

xc: Chris Williams, OCD Hobbs District Supervisor

J.R. Brinkley



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December 5, 2000

Pierce Operating
Attn: Bill Pierce
P.O. Box 1969
Eunice, New Mexico 88231-1969

Re:

House Well #1

UL D-Sec 13-T20S-R38E

Mr. Pierce:

The New Mexico Oil Conservation Division (NMOCD) has become aware that Pierce Operating (Pierce) has existing contamination due to oil field operations. Depth to groundwater in the area is approximately 42 feet. Rule 19.B, Abatement Standards and Requirements states that the vadose zone shall be abated so that water contaminants in the vadose zone will not with reasonable probability contaminate ground water or surface water, in excess of the standards through leaching, percolation, or other transport mechanisms, or as the water table elevation fluctuates.

Due to the contamination at the above referenced location the NMOCD hereby requests the following:

- 1. Pierce shall perform vertical and horizontal extent at the above referenced location to determine the extent of the contamination.
- 2. Pierce shall perform a site assessment and determine cleanup standards, using the guidelines for assistance. For your use a copy of the guidelines are included.
- 3. Pierce shall submit to the NMOCD a site assessment and/or a remediation plan, with the findings of the investigation included, by December 27th, 2000, for approval.

If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams

Environmental Engineer Specialist

cc: Roger Anderson – Environmental Bureau Chief Chris Williams – District I Supervisor

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary Lori Wrotenbery
Director
Oil Conservation Division

December 5, 2000

Pierce Operating Attn: Bill Pierce P.O. Box 1969 Eunice, New Mexico 88231-1969

Re:

House Well #1

UL D-Sec 13-T20S-R38E

Mr. Pierce:

Through an inspection the New Mexico Oil Conservation Division (NMOCD) has become aware of a pit located just northeast of House Well #1 that is being operated by Pierce Operating (Pierce). The NMOCD has reason to believe that there is existing groundwater contamination in this area. Due to this information and the depth to groundwater in the area being approximately 42 feet, the NMOCD hereby requests Pierce to perform a site investigation and submit a remediation plan. Rule 19.B, Abatement Standards and Requirements states that the vadose zone shall be abated so that water contaminants in the vadose zone will not with reasonable probability contaminate ground water or surface water, in excess of the standards through leaching, percolation, or other transport mechanisms, or as the water table elevation fluctuates.

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Sincerely,

Donna Williams

Environmental Engineer Specialist

cc: Roger Anderson - Environmental Bureau Chief Chris Williams - District I Supervisor

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New Mexico Office of the State Engineer Well Reports and Downloads

Township: 208	Range: 38E	Sections:			
NAD27 X:	Y:	Zone:	Search Radius:		
County:	Basin:	Numb	per: Suffix:		
Owner Name: (First)	(Las	•	C Non-Domestic C Domestic		
		• All			
Well Data Report	Avg Depth	to Water Report	Water Column Report		
	Clear Form	WATERS Menu	Help		

AVERAGE DEPTH OF WATER REPORT 12/05/2000

								(Depth	Water :	in Feet)
Bsn	Tws	Rng	Sec	Zone	х	Y	Wells	Min	Max	Avg
CP	20S	38E	33				1	35	35	35
L	20S	38E	02				14	38	57	4 4
L	20S	38E	03				2	25	45	35
L	20S	38E	05				2	24	54	39
L	20S	38E	06				5	53	67	62
L	205	38E	07				1	80	80	80
L	205	38E	80				1	60	60	60
L	20s	38E	10				3	30	52	43
L	20S	38E	11				6	31	90	47
L	20S	38E	12				3	46	65	54
L	205	38E	13				1	42	42	42
L	20S	38E	14				1	38	38	38
L	20s	38E	18				1	50	50	50
L	205	38E	26				1	65	65	65

Record Count: 42

Olson, William

From:

Jerzy Kulis [jerzy kulis@nmenv.state.nm.us]

Sent:

Wednesday, February 14, 2001 9:23 AM

To:

wolson@state.nm.us

Subject: Info on discharges from Hobbs WWTP

Bill,

Here is the information on discharges from the Hobbs WWTP:

- 1. Location of discharges:
 - infiltration basins: Section 2.300, T20S, R37E
- land application (the farmland belongs to a local farmer): Sections 24, 25, and 26, T19S, R38E; Sections 18, 19, and 30.100, T19S, R39E
 - sludge disposal area (not used anymore): Section 2, T20S, R37E
- 2. TDS and chloride in effluent (data for 2000):
 - TDS 730-925 mg/l
 - chloride 205-318 mg/l
- 3. TDS and chloride in monitoring wells (data for year 2000):
 - infiltration basins:

TDS 780-1220 mg/l

chloride 200-270 mg/l

- land application:

TDS 410-490 mg/l

chloride 70-200 mg/l

- sludge disposal

TDS 760-2240 mg/l

chloride 80-630 mg/l

Regarding the waste disposal ponds between the Rhino facilities and Brinkley's property, the site is called Lea County Septic. If you want more information on that site, call Mary Heather Noble, a technical reviewer for their discharge permit, at 827-2782.

If you have any questions to me, please call me at 827-2828.

Jerzy Kulis