

## GENERAL CORRESPONDENCE

## YEAR(S):

Warren D. Richardson Staff Landman Midland Division Exploration Production North America

June 10, 1998

New Mexico Oil Conservation Division 1000 W. Broadway Hobbs, NM 88240

Attn: Mr. Wayne Price Environmental Engineer

RE: Ownership of State Oil and Gas Lease No. B-2656 NW/4 SW/4 Section 33-T18S-R38E, Lea County, New Mexico L-13988 Conoco Inc. 10 Desta Drive, Suite 100W Midland, Texas 79705 Bus. (915) 686-5576 Fax (915) 686-6586

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Dear Mr. Price:

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According to our records, Conoco Inc. is the current owner of record title on the subject lease dated 9/23/33. Continental Oil Company (now Conoco Inc.) acquired the lease directly from the State of New Mexico.

Conoco drilled three wells on the subject acreage, the State A-33 #2, #8 and #12. The State A-33 #2 well was drilled to a depth of 4,174' in 1930 at a location of 2,310' FSL and 330' FWL of Section 33, and produced from the Grayburg/San Andres formations. The State A-33 #8 well was drilled to a depth of 3,200' in 1948 at a location of 2040' FSL and 660' FWL of Section 33. The well produced from the Seven Rivers formation and was plugged and abandoned in 1971. The State A-33 #12 well was drilled in 1969 to a depth of 7,000' at a location of 2,175' FSL and 625' FWL of Section 33. The well produced from the Seven Rivers formation and was plugged and abandoned in 1971. The State A-33 #12 well was drilled in 1969 to a depth of 7,000' at a location of 2,175' FSL and 625' FWL of Section 33. The well produced from the Drinkard formation and was sold to Brothers Production Company, Inc. along with all of Conoco's operating rights in the leasehold acreage, between the depths of 5,300' to 7,005' effective on September 1, 1991.

The N. Hobbs Grayburg/San Andres unit also covers the subject acreage. This unit is currently operated by Altura Energy and has Unit Well No. 131 (previously the State A-33 #2 well mentioned above) located on the acreage. The Unit was formed in 1971. Conoco traded all of its interest in the unit to Amoco Production Company effective 9/1/94.

In summary, Conoce owns record title to the subject leasehold interest in NW/4 SW/4 Section 33-T18S-R38E, Lease County, New Mexico. <u>Conoco currently operates no wells on the subject</u> acreage, and its operating rights are limited to the following depths:

- Surface to 3,698' (top of the N. Hobbs GB/SA unitized interval).
- Depths between 4,500' (base of the N. Hobbs GB/SA unitized interval) and a depth of 5,300' below the surface.

All depths below 7,005' below the surface.

Please contact this office with any questions you may have on this matter.

Sincerely, Warren Richardson

Staff Landman

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cc: Conoco Hobbs Office







10 Desta Drive, Suite 100W

(915) 686-5425 Fax: (915) 686-5780

Midland, TX 79705-4500

Conoco Inc.

Neal Goates Sr. Environmental Specialist Mid-Continent Region Exploration-Production North America

August 28, 1998

Mr. Wayne Price Oil Conservation Division District 1 Hobbs PO Box 1980 Hobbs, NM 88241-1981

Re: Section 33 Oil Pit in Hobbs, NM

Subject: Phase I Assessment



Dear Mr. Price:

As requested by the New Mexico Oil Conservation Division NMOCD, Conoco has conducted an environmental Phase I investigation of the Section 33 area in Hobbs, NM. The following data, discussion, and conclusion is intended to aid in the potential source and pit usage of the site and is not to be interpreted conclusive of the site in it's entirety. The Phase I Assessment included:

- 1. Inspection of the site including photographs, survey/drawing, finding, and conclusions (Western Environmental Consultants).
- 2. Altura Energy LTD Phase I Assessment Report to NMOCD.
- 3. Conoco records review (Field and ROW&C).
- 4. Collection of historical aerial photo's (Hobbs City Engineer's Office).
- 5. Site contamination sampling and analyses to identify the potential source of hydrocarbon contamination.
- 6. Title Search for surface lease holders (Conoco ROW, Land departments).
- 7. Personal interviews with Conoco employees and Area Oil Industry Contractors.

Results of the Phase I Assessment provide no clear indication regarding the persons in charge of pit operations but aerial photos confirm such operations existed. The site visit revealed signs of aged hydrocarbon pooling at the surface during drought conditions. In addition, cross contamination (tar flakes) are mobile during times of area flooding. The historical pits are sectioned between Conoco and Altura lease boundaries. Upon visual analysis of the aerial and site inspection, one could suspect that the tricompartment design was used for ease of truck travel between the pits for loading or unloading of fluids. The pit design could be a separation process for oil, produced water, and emulsion. Thus the tri-compartment design. In



addition, a junction box supporting a transfer pipeline was sited north and adjacent to a tributary leading to the depression. Source material was found in the tributary from what appears to be from a junction box area leading down to the playa. Due to the apparent design of the fluid storage within the playa, it would be untraditional for separate E&P operators to own and share such compartment pits.

The sampling analysis was performed in known hot spot locations within the Conoco lease area. Sample 1 was taken in the cross-contaminated area 55 feet from the pipeline area located near the center of the playa. Sample 2 was taken in an area of potential cross contamination from the State A-33 facility south of the playa and abandoned septic tank at the west edge of the playa. Sample 3 was taken in an area of visible west-to-east cross contamination from the Shell Western 33-131 facility. EPA method 418.1 indicate that TPH levels fluctuate between 5500 ppm to 230 ppm at surface to four inch depths, and 1600 ppm to 180 ppm at 2 foot depths. EPA Method 8020 indicates BTEX readings are below detection limit for all three sampling locations confirming the source material to be aged hydrocarbon. In addition, Conoco analyzed for chromium and lead in the soil using EPA method 6010 to determine if refined product was the source for hydrocarbon contamination. The results from method 6010 are inconclusive that lubricants are the primary source of contamination due to the low concentrations well below EPA accepted TCLP maximum contamination levels for chromium and lead.

In conclusion, the responsible party is not clearly defined from the information currently available from Conoco records, interviews, and public records. Current area E&P operations appear compliant to spill response and remediation guidelines with the exception of the pending spill currently warranting this investigation. The depression and surrounding area has obvious problems associated with illegal dumping in and around the playa. The mixture of historic waste and potential hazards from ongoing household waste could deteriorate surface and/or groundwater quality now and in the future.

If you require any further information or assistance please do not hesitate to call me at (915-686-5488).

Sincerely Yours,

Neal Goates Sr. Environmental Specialist



## NMOCD INTER-OFFICE CORRESPONDENCE

TO: File of Altura/Amoco/Conoco

From: Wayne Price-Environmental Engineer

Date: May 26, 1998

Reference: Old Pit near Continental Trailer Park

Subject: Meeting

Comments:

Attending: Gary Bullock, Steve Bishop- Altura Bob Paulie- Conoco

NMOCD presented overview and plot plan (attached)

## Conclusions:

Both companies will research records and file a written report by June 12, 1998.

NMOCD will respond back in writting.

If companies are leagal lease holders then they will submit Phase I plan by July 15, 1998.

cc: Chris Williams-NMOCD District I Supervisor

attachments-1

<u>May 26, 1998</u>	
Meeting:	<u>Old Pit Near Continental trailer park on west Broadway Place.</u> Hobbs, NM.
<u>History:</u>	Unknown at this time:
<u>Recent activity:</u>	Altura recently had a small flow line leak and in the resultant clean-up this historical contamination was found.
Land Status:	NM State Land.
LEASE STATUS:	North half appears to be Amoco, South half Conoco per NM State Land office.
<u>Contamination:</u>	Appears to be old asphaltic hardpan with an area that has free oils leaching to surface. Also when Altura was remediating area found a soft spot where truck begin to sink. Area does have vegetation, elm tress, weeds etc. There are some vegetation stressed areas.
OCD's Concern:	Possible ground water contamination, and public health concern due to close proximity of nearby Trailer Park.
<u>Action Plan:</u>	NMOCD is requesting that Altura/Amoco & Conoco research records to determine if this property is part of their lease holdings and if so then submit a plan of action to remediate the area.



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OIL CONSERVATION DIVISIO HOBES DISTRICT OFFICE

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June 12, 1998

Mr. Warren D. Richardson Conoco Inc. 10 Desta Drive, Suite 100W Midland, Texas 79705

Re: Ownership of State Oil and Gas Lease No. B-2656 NW/4 SW/4 Section 33-T18s-R38E Lea County, New Mexico L-13988

Dear Mr. Richardson:

New Mexico Oil Conservation Division (NMOCD) is in receipt of your response for the above referenced site. After reviewing your response and the fact that Conoco is the current owner of the lease, please provide a phase I environmental site assessment by July 15 as requested pursuant to our meeting held on May 26, 1998.

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

Sincerely Yours,

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Wayne Price-Environmental Engineer

cc: Chris Williams-NMOCD District I Supervisor

file: wp98/33pit



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Warren D. Richardson Staff Landman Midland Division Exploration Production North America

June 10, 1998

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Staff Landman

cc: Conoco Hobbs Office

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1034		Carl's Rimpinck Schnee, Inc.	Hebbs N. M.				X		1.148 52	27.85		Conurl
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Ş		Shell Westran E ? P Inc. etal	Mid And TexAS				X		1.73 3 1.	31-96		Renewa)
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1039	-	C-W. Bureno	Hope Aun mudico				X		1.28 6	-25-86 R	Jamen	losignment
.1003		Consist. Inc.	Keppo, Juw milico	•	· ·			X	2.296 6	25-1990 7	-13-89 8	Reing. back to State
- 499		Concrete Mrc.	Ishuro, ruw milie					$\times$	2.013 8	28-1960	5	Jeneur 1
298		Southwester ablic Bel. Co.	AMARILLA, JEXAS			X			356 10			
-989		Unichen International Inc.	Hobbs, N. M.				X		4.132 1-	16-8		Demeusel
-493		Y. H. West DROOK	Habbs, N.M.				X		7.601 8	-16-90 12	1-89 (C	35515
-S33		Shall bleetern E ? P Inc. et al	Midland, TexAS				X		1722 1-	31-91		Terriva)
C18.		Hobbs Municipal Schools	Hobbs, N.M.		×				40 19	-5-86		konner (
2042	-	Southwesting Public Survice Company	amarillo, Ichas			$\triangleleft$	X		1.94 4.	-54		
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952		Eddivis-Walcher Company	Midlaud, Texas				X		2.384 5	15-91		Remember .
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