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GENERAL CORRESPONDENCE

YEAR(S):

1998

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

Memorandum

To:

Tim Gumm-District II Supervisor

From: Wayne Price-Environmental Bureau Santa Fe

Date: October 9, 1998

Re:

Lowe "B" State Tank Battery

NW/4NE/4 Sec 4-Ts19s-R28e

Eddy Co., NM

Please find enclosed a copy of the memo to the NM State Land Office and a copy of my recent field report for the above referenced facility which includes recommended actions for the operator. Also included is a copy of the photo's.

When this project is complete could you send us a copy.

Thanks!

attachments-yes

o GRIA 9759

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

Memorandum

To:

Phyllis Ludi

Land Office OGMD Env. Eng.

310 Old Santa Fe Trail

P.O. Box 1148

Santa Fe, NM 87504-1148

From: Roger Anderson-Environmental Bureau Chief

Date: October 8, 1998

Re:

Lowe "B" State Tank Battery

NW/4NE/4 Sec 4-Ts19s-R28e

Eddy Co., NM

New Mexico Oil Conservation Division (NMOCD) received your inquiry concerning the above referenced facility. On September 29, 1998 NMOCD personnel performed a field inspection of the site. Please find enclosed our field report which includes our findings and recommended actions to be taken. Oversight of the clean-up will be handled by our NMOCD Field office located in Artesia, NM. Please feel free to contact Mr. Tim Gumm NMOCD District II Supervisor (505-748-9720) concerning the progress of the clean-up.

NMOCD District II has been working with the operator since May 27, 1998 and issued a letter concerning operations at this site. There have also been recent verbal communication between NMOCD and the operator. This well is in the Stripper Well Category and with oil prices at an all time low, the operator requested additional time for the clean-up of this and other sites. There was a higher priority site in which the operator was given authority to clean-up first, the operator will now direct his attention to the above mentioned site.

If you require any further information or assistance please do not hesitate to call Wayne Price at 505-827-7155.

cc:

Tim Gumm-NMOCD District II Supervisor

ra/wp - file: collnmsl

attachments-field report & communication letters



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury

Oil Conservation Div Environmental Bureau 2040 S. Pacheco Santa Fe, NM 87505

Field Inspection Report

Time: Date:

September 29, 1998

Re:

Site/Location:

Location:

NW/4 NE/4 Sec 4-Twp 19s-R28e

Facility:

Lowe "B" State Tank Battery

Lessee

Enna Lowe. P.O. Box 1, Round Mountain, TX 78663

Lease Operator:

Dwayne Parrish, Artesia, NM 505-746-4651

Subject:

Inquiry from NMSLO(Santa Fe) concerning oilfield contamination;

Inspector(s):

Wayne Price-NMOCD Santa Fe Environmental Bureau

Bryan Arret-NMOCD Artesia District II

Other Parties:

Jim Carr-NMSLO Carlsbad office.

Findings:

Small active open unlined & un-netted pit, water leg discharge pipe from battery is broken and discharging fluids onto the ground. It appears system is designed to discharged all water to pit since there is only one tank to receive oil from treater. Two tanks on site have lost mechanical integrity and one tank has oil & BS seeping out 1. of tank onto the ground.

Area west of tank and pit has visual BS&W & oil covered with calichie.

Access road has visual oil contamination.

4. Area around battery has visual oil & salt water contamination.

Ground Water Research:

Per NM State Engineer's office ground water in the area is approximately 150-160 feet BGL and found in nearby sections 2&5 wells being used as stock wells. The fresh water producing formation is shown to be the Rustler and it overlies the declared Capitan water basin. The exact water quality was not given but was considered fresh because of the stock well use.

Photos Taken: yes; on file

Recommended Actions:

The operator should submit a clean-up plan to the NMOCD District II office for approval. The plan should contain a site assessment, remediation methods and proposed clean-up standards per NMOCD guidelines, including a time schedule for completion of events. At the end of the project the operator should provide a closure plan for NMOCD District II approval.

The operator should provide to the NMOCD District II office documentation reflecting the amount of produced water discharged to the pit. If this amount exceeds the R-3221 exemption then the operator should also include in the clean-up plan closure of the pit. If the pit remains in operation then it must be pursuant to all NMOCD rules and regulations.

cc:

Tim Gumm-NMOCD District II -Artesia

NMSLO-Santa Fe office

file: wp98sf- collierl

May 27,1998

H. Dwane Parrish, Jr. & Ronda K. Parrish 1306 S. 9th Street Artusia, New Mexico 88210

Re: D 4 19-28 Lowe "B" State Tank Battery

Attention Dwayne & Ronda,

A redent field inspection @ your Lowe "B" tank battery showed the surface pit to have oil in it. The pit is not notted as per rule 313. Pitable remove uses said in the nit and repair the notting.

Also there are two oil spills at this battery which need to be remedated. Rule 116 "A" Requires any oil spill over five barrels to be reported. Please see that the proper remedation is applied to these spills and report to me actions taken.

On this inspection it was also noted that the well signs dill lank bullury signs are your lowe "A". Lowe "B", and Copen State leases do not have the current lease operature on them. Please correct your well and tank battery signs to read the correct operatur. Any new well signs eracted must have the well API Number on them. Please address these issues as soon as possible. If you have questions call at the office.

Sincerely,

Mike Stubblefield
Deputy Oil & Gas Inspector

DATE: October 1, 1998

FROM: Mike Stubblefield

TO: Wayne Price

August 11, 1998 at 7:30 A.M. I called Dwayne Parrish. Asked Dwayne if he had received my letter. He said yes. He stated his backhoe has been in shop for repair and was finally fixed this week. I told him there was water going to pit in excess of R-3221 one (1) barrel per day.

I requested that he do remediation at P-12 tank battery. Oil is coming to surface from covered surface pit and is standing in pools.

September 30, 1998, 1:05 P.M.

I called Dwayne Parrish. He said his backhoe is at P-12 tank battery. He has been mixing cow manure with oil contaminated soil and is almost completed with projoob at P-12 battery.

He has purchased netting for pit at lowe B tank battary. He will move his backhoe over to lowe B tank battery as soon as possible to remediate oil spills. Will renet pit also. I also stated it appeared water was going to pit at lowe B tank battery in excess of 1 DWPD. He said he did not believe more than 1 BWPD was going to pit.







COMMERCIAL RESOURCES (505)-827-5724

SURFACE RESOURCES (505)-827-5793

MINERAL RESOURCES (505)-827-5744

> ROYALTY (505)-827-5772

State of New Mexico Commissioner of Public Lands

Ray Powell, M.S., D.V.M. 310 Old Santa Fe Trail, P. O. Box 1148 Santa Fe. New Mexico 87504-1148 Phone (505)-827-5760, Fax (505)-827-5766 PUBLIC APPAIRS (505)-827-3765

ADMINISTRATIVE MOMT. (505)-827-5700

> LEGAL (505)-827-5715

PLANNING (505)-627-5752

Memorandum

To:

Wayne Price, OCD Env. Eng.

Phyllis Ludi, Land Office OGMD Env. Eng.

827-5750

Date:

09/24/98

Re:

Lowe "B" State Tank Battery Reclamation

As we discussed on the telephone this afternoon, here is the information about the Lowe "B" State Tank Battery Reclamation:

Location:

NW4 NE4 Sec 4 Twp 195 Range 28E

Facility Name: Lowe "B" State Tank Battery

Erma Lowe, P.O. Box 1, Round Mountain, TX 78663

Lease Operator: Dwayne Parrish, Artesia, NM 505-746-4651

Lease Number: OG-605

This problem first came to light in May 1998 when Jim Carr, Land Office Land Use Specialist, found it. The tank battery is in disrepair, there are numerous oil spills around the pit, tanks, and access road. The pit fence needs to be repaired and netting installed, the junk needs to be hauled away, and the oil spills remediated and reclaimed.

Mike Matush in the Land Office Field Operations division contacted Roger Anderson at OCD about the necessary cleanup. Mike's in-house report indicated that OCD will be working directly with Mr. Parrish, the lease operator.

Right now, I'm trying to find out what the status of this project is, and what the Land Office needs to do to be sure the cleamup happens following OCD rules and in a timely fashion.

I look forward to talking with you again early next week. My phone number is 827-5750.

Mike Matush, Land Office Field Operations Division



SEPT 29, 1998 BY: WAYNE ARICK

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Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e Date: 09/29/98 By: W Price-NMOCD SF

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Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e Date: 09/29/98 By: W Price-NMOCD SF

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Date: 09/29/98 By: W Price-NMOCD SF



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Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e Date: 09/29/98 By: W Price-NMOCD SF

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(No. 3) 822 21 +2

Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e

Date: 09/29/98 By: W Price-NMOCD SF

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Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e Date: 09/29/98 By: W Price-NMOCD SF

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Collier Energy-Lowe B State Unit B Sec 4-Ts19s-R28e Date: 09/29/98 By: W Price-NMOCD SF

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