

NM1 - 44

**GENERAL
CORRESPONDENCE**

YEAR(S):

2005-2004

CRI
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241
(505) 393-1079 • FAX (505) 393-3615

June 30, 2005

Mr. Mark Fesmire
Director
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

2005 JUL 1 AM 9 26

The three listed facilities permitted by NMOCD are under common ownership.

Commercial Exchange, Inc.
Permit # NM 01-0037
Approved 07-29-03

Monument Treating Plant

Commercial Exchange, Inc.
Permit # 42
Effective 07-22-04

Dollarhide Landfarm

Commercial Exchange, Inc.
Permit #44
Effective 11-01-04

Dollarhide Treating Plant

Attached you will find photos of the treating plants and the conditions that exist on the facilities.

This should provide reasons enough for NMOCD to not accept applications without thorough investigation of reporting and operating conditions, and to deny permits to any entity not in total compliance with all Rules, Regulations, and Permit conditions, including financial assurance.

Also attached is a page from NMOCD web site which does not include Commercial Exchange NM 01-0037, 07-29-03.

This is a textbook example of a series of events that should never have occurred, a need for additional resources in NMOCD Environmental Bureau with serious oversight by the director and a change of policies.

This is a formal complaint.

Please advise when the investigation is complete and the procedure for obtaining the results and work products as part of the public information policy.

Sincerely,


Ken Marsh

cc: Joanna Prukop

Permit No.	Company Name	Effective	County	Facility Name	Legals
19	GANDY MARLEY INC	10/06/1994	Chaves	GANDY MARLEY LANDFARM	-4-11 S-31 E
28	OLD LOCO OIL CO	07/02/1985	Eddy	OLD LOCO TREATING PLANT	-19-17 S-31 E
4	LOCO HILLS WATER DISPOSAL	10/30/1981	Eddy	LOCO HILLS WATER DISPOSAL	M-16-17 S-30 E
36	OK HOT OIL SERVICE INC	08/16/2000	Eddy	OK HOT OIL SERVICES INC	O-14-17 S-28 E
25	GANDY CORP	06/27/1973	Lea	Gandy Corp. Treating Plant	-11-10 S-35 E
15	GOO YEA LANDFARM INC	11/16/1992	Lea	GOO YEA LANDFARM	-14-11 S-38 E
13	ENVIRONMENTAL PLUS INC	02/15/1993	Lea	ENVIRONMENTAL PLUS LANDFARM	-14-22 S-37 E
6	CONTROLLED RECOVERY INC	04/27/1990	Lea	CONTROLLED RECOVERY	-27-20 S-32 E
34	DD LANDFARM INC	04/12/2000	Lea	DD LANDFARM	-31-21 S-38 E
35	LEA LAND INC	01/05/2000	Lea	LEA LAND LANDFILL	-32-20 S-32 E
21	RHINO OILFIELD DISPOSAL INC	11/17/1997	Lea	RHINO OILFIELD LANDFARM	-34-20 S-38 E
30	ARTESIA AERATION LLC	06/29/1999	Lea	ARTESIA AERATION LANDFARM	-7-17 S-32 E
23	J&L LANDFARM INC	05/10/1998	Lea	J&L LANDFARM	-9-20 S-38 E
32	SOUTH MONUMENT SURFACE WASTE FACILITY LLC	10/04/1999	Lea	SOUTH MONUMENT LANDFARM	A-25-36 S-20 E
39	PITCHFORK LANDFARM LLC	10/30/2002	Lea	PITCHFORK LANDFARM	A-5-24 S-34 E
24	CHAPARRAL SWD	01/31/1995	Lea	CHAPARRAL TREATING PLANT	B-17-23 S-37 E
12	C&C LANDFARM INC	11/16/1992	Lea	C&C LANDFARM	B-3-20 S-37 E
44	COMMERCIAL EXCHANGE, INC.	11/01/2004	Lea	Blackwater Oil Reclamation Facility	d-1-25 S-37 E
26	JENEX OPERATING CO	09/21/1983	Lea	JENEX TREATING PLANT	D-14-20 S-38 E
42	COMMERCIAL EXCHANGE, INC.	07/22/2004	Lea	Blackwater Landfarm	f-1-25 S-37 E
33	DOOM LANDFARM	04/03/2000	Lea	DOOM LANDFARM	g-5-25 S-37 E
41	LAZY ACE LANDFARM LLC	03/09/2004	Lea	LAZY ACE LANDFARM	M-22-20 S-34 E
3	SUNDANCE SERVICES, INC.	08/30/1977	Lea	SUNDANCE PARABO	m-29-21 S-38 E
38	SAUNDERS LANDFARM LLC	10/28/2002	Lea	SAUNDERS LANDFARM	M-7-14 S-34 E
8	T-N-T ENVIRONMENTAL INC	01/19/1987	Rio Arriba	TNT EVAP POND/LANDFARM	-8-25 N-3 W
11	ENVIROTECH INC	07/07/1992	San Juan	ENVIROTECH LANDFARM #2	-6-26 N-10 W
9	KEY FOUR CORNERS INC	04/02/1991	San Juan	KEY EVAP POND and Landfarm	E-2-29 N-12 W
5	BASIN DISPOSAL INC	10/16/1987	San Juan	BASIN DISPOSAL EVAP. POND	F-3-29 N-11 W
10	JFJ LANDFARM LLC	07/22/2002	San Juan	JFJ Land Farm Crouch Mesa (Tierra)	j-2-29 N-12 W

missing nm 01-0037



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

July 29, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Mr. TG Herring
Commercial Exchange, Inc.
P.O. Box 3236
Lubbock, TX 79452

**RE: OCD Rule 711 Permit Approval NM-01-0037
Commercial Exchange, Inc.
Commercial Surface Waste Management Facility
NE/4 of Section 1, Township 20 South, Range 36 East, NMPM,
Lea County, New Mexico**

Dear Mr. Herring:

The permit application for the Commercial Exchange, Inc. commercial surface waste management facility located in NE/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico is hereby approved in accordance with New Mexico Oil Conservation Division (OCD) Rule 711 under the conditions contained in the enclosed attachment. **This permit approval is conditional upon the receipt and approval by the Director of financial assurance in the amount of \$125,737.** According to the schedule outlined in the financial assurance section of the enclosed attachment, a portion of the \$125,737 financial assurance (\$31,435) is required within 30 days of the date of this permit approval letter. The application consists of the permit application Form C-137 dated March 31, 2003, supplemental information dated May 18, 2003 supplemental information received May 22, 2003, May 28, 2003, June 9, 2003, June 16, 2003 and June 23, 2003.

The operation, monitoring and reporting shall be as specified in the enclosed attachment. All modifications and alternatives to the approved treating plant methods must receive prior OCD approval. Commercial Exchange, Inc. is required to notify the Director of any facility expansion or process modification and to file the appropriate materials with the Division.

Please be advised approval of this facility permit does not relieve Commercial Exchange, Inc. of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Commercial Exchange, Inc. of responsibility for compliance with other federal, state or local laws and/or regulations.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-137
Revised June 10, 2003

Submit Original Plus 1
Copy to Santa Fe
1 Copy Appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

Commercial Centralized

1. Type: Evaporation Injection Other
 Solids/Landfarm Treating Plant

NM-1-0042

2. Operator: Blackwater Landfarm

Address: 3309 67th West Bldg., Suite 4, Lubbock, TX 79413

Contact Person: Mark Goss Phone: (806) 543-8187

20 acres - S 1/2 of the SE 1/4 of the NW 1/4

3. Location: /4 /4 Section 1 Township 25 S Range 37 E

Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? Yes No
5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.
6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.
8. Attach a contingency plan for reporting and clean-up for spills or releases.
9. Attach a routine inspection and maintenance plan to ensure permit compliance.
10. Attach a closure plan.
11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.
12. Attach proof that the notice requirements of OCD Rule 711 have been met.
13. Attach a contingency plan in the event of a release of H₂S.
14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay

Title: Agent

Signature: Eddie W Seay

Date: 7/22/2004

E-mail Address: seay 04 @ leaco . net

Department of Environment and Natural Resources
 Waste Management Program
 Joe Foss Building
 523 East Capitol
 Pierre, SD 57501-3182
 Telephone: (605) 773-3153

STATE OF SOUTH DAKOTA
 BEFORE THE SECRETARY OF
 THE DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

IN THE MATTER OF THE)
 APPLICATION OF _____)
 _____)
 STATE OF SD)
 _____)
 COUNTY OF _____)

CERTIFICATION OF
 APPLICANT

SS

Handwritten notes:
 This is from
 South Dakota
 similar criteria for
 NM should have
 been used in
 exchange permit
 application

I, _____, the applicant in the above matter after being duly sworn upon oath hereby certify the following information in regard to this application:

(A) South Dakota Codified Laws Section 1-40-27 provides:

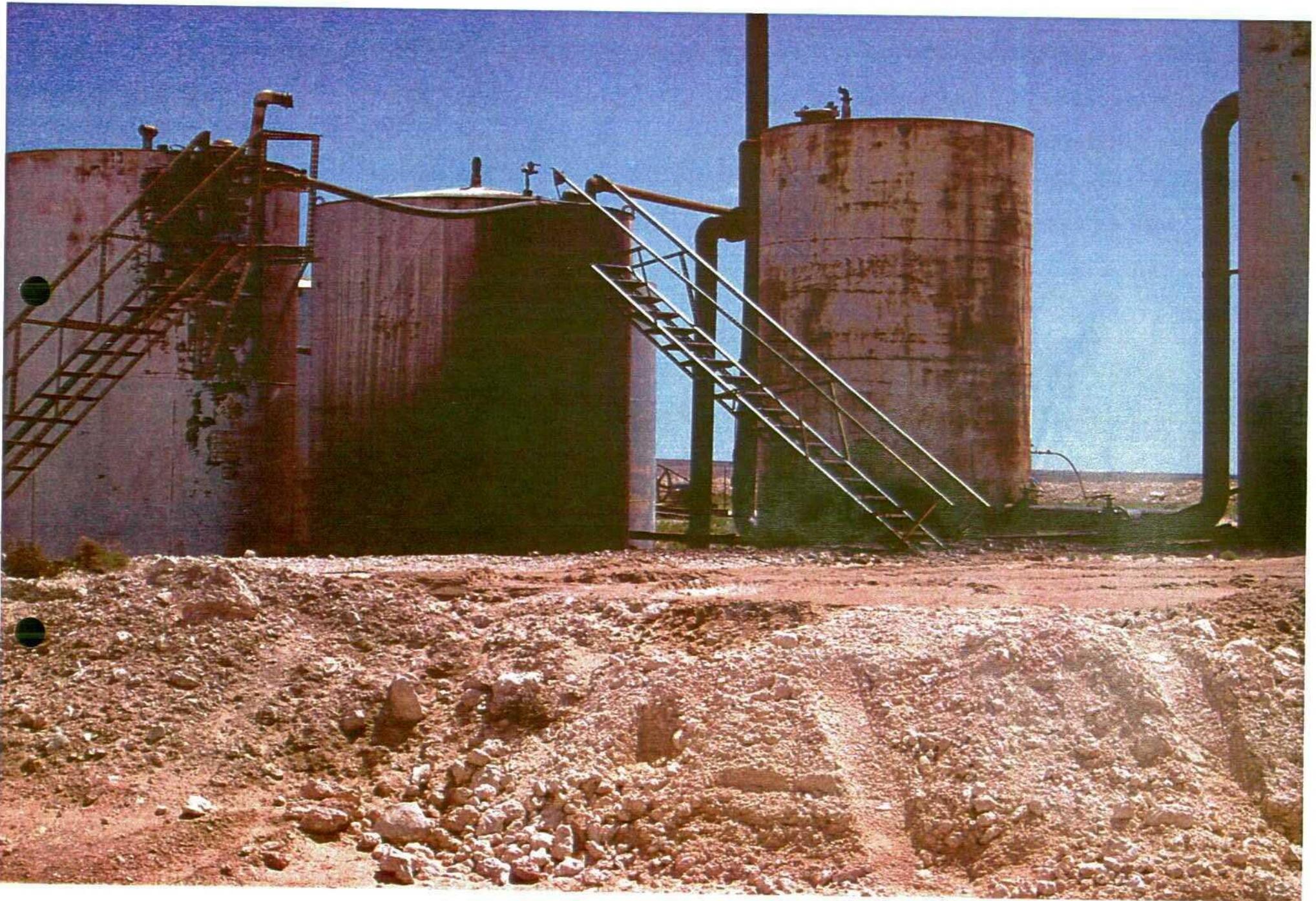
"The secretary may reject an application for any permit filed pursuant to Titles 34A or 45, including any application by any concentrated swine feeding operation for authorization to operate under a general permit, upon making a specific finding that:

(1) The applicant is unsuited or unqualified to perform the obligations of a permit holder based upon a finding that the applicant, any officer, director, partner or resident general manager of the facility for which application has been made:

- (a) Has intentionally misrepresented a material fact in applying for a permit;
- (b) Has been convicted of a felony or other crime involving moral turpitude;
- (c) Has habitually and intentionally violated environmental laws of any state or the United States which have caused significant and material environmental damage;
- (d) Has had any permit revoked under the environmental laws of any state or the United States; or
- (e) Has otherwise demonstrated through clear and convincing evidence of previous actions that the applicant lacks the necessary good character and competency to reliably carry out the obligations imposed by law upon the permit holder; or

(2) The application substantially duplicates an application by the same applicant denied within the past five years which denial has not been reversed by a court of competent jurisdiction. Nothing in this subdivision may be construed to prohibit an applicant from submitting a new application for a permit previously denied, if the new application represents a good faith attempt by the applicant to correct the deficiencies that served as the basis for the denial in the original application.

All applications filed pursuant to Titles 34A and 45 shall include a certification, sworn to under oath and signed by the applicant, that he is not disqualified by reason of this section from obtaining a

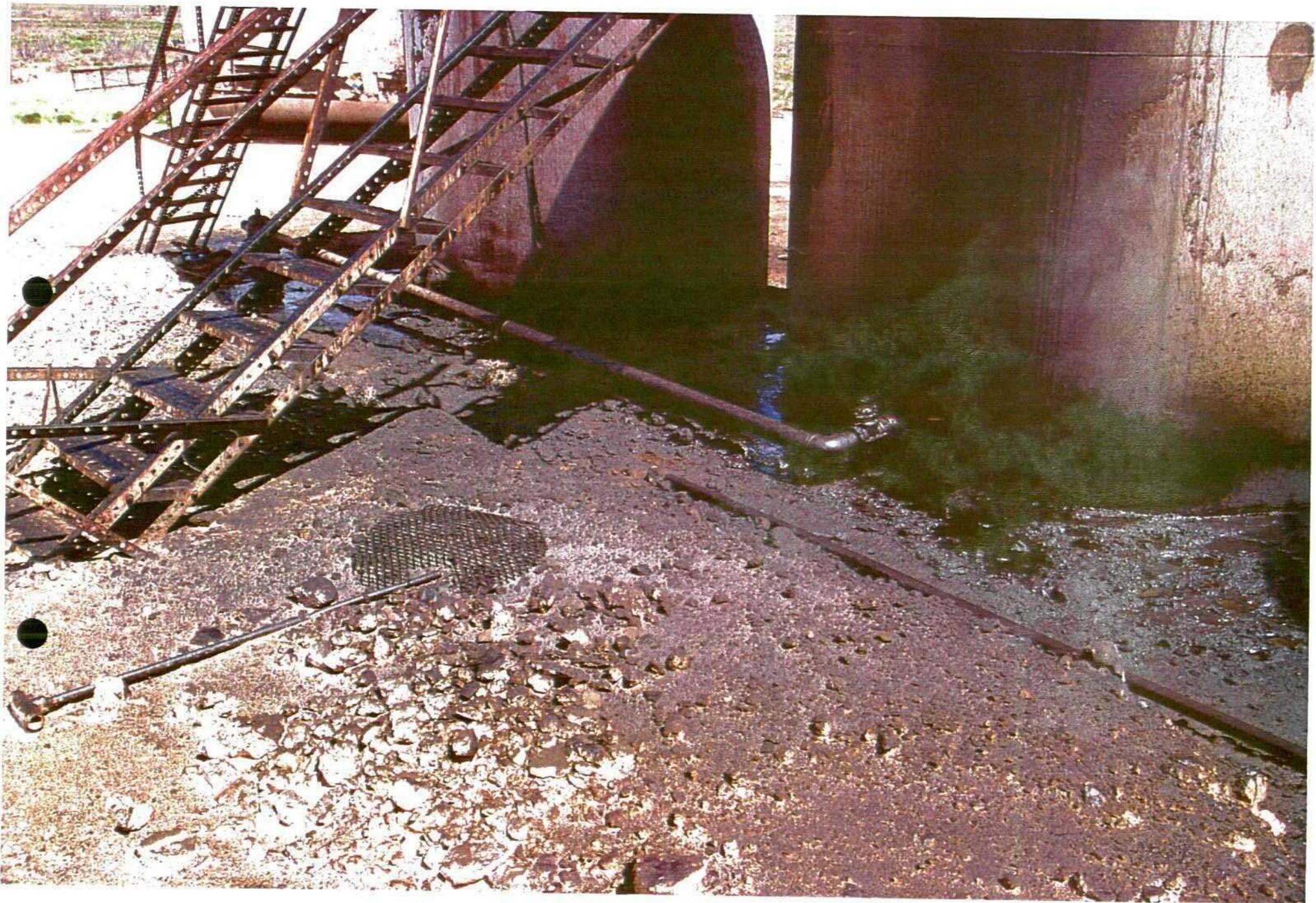


Blackwater Treating Plant

Dollarhide



Dollachibc



Pollachide

No beam
↙

Hilo i Boney



Do Han hido

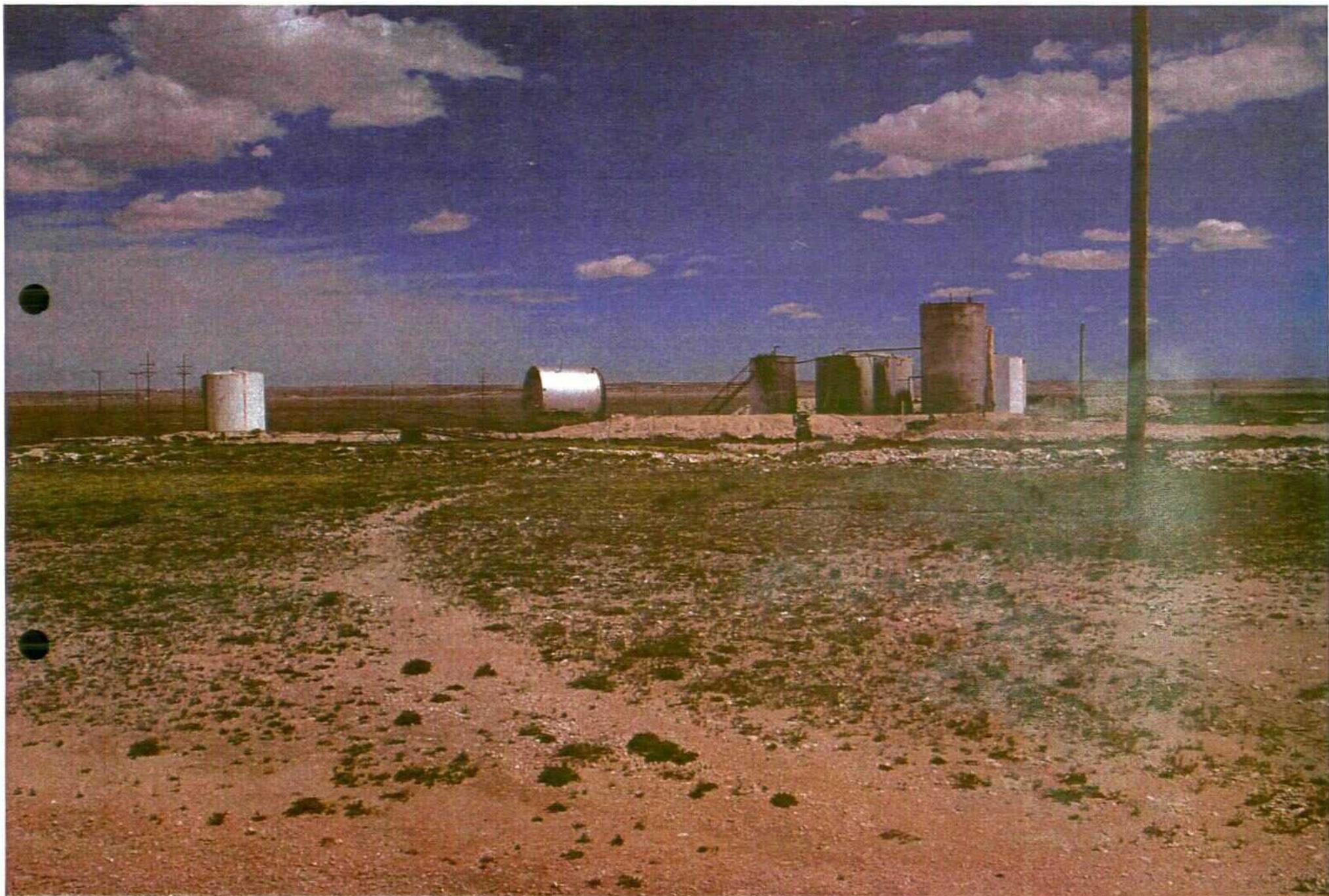


pit at Acapulco - staining on wall.



Dollanhide

Blackwater

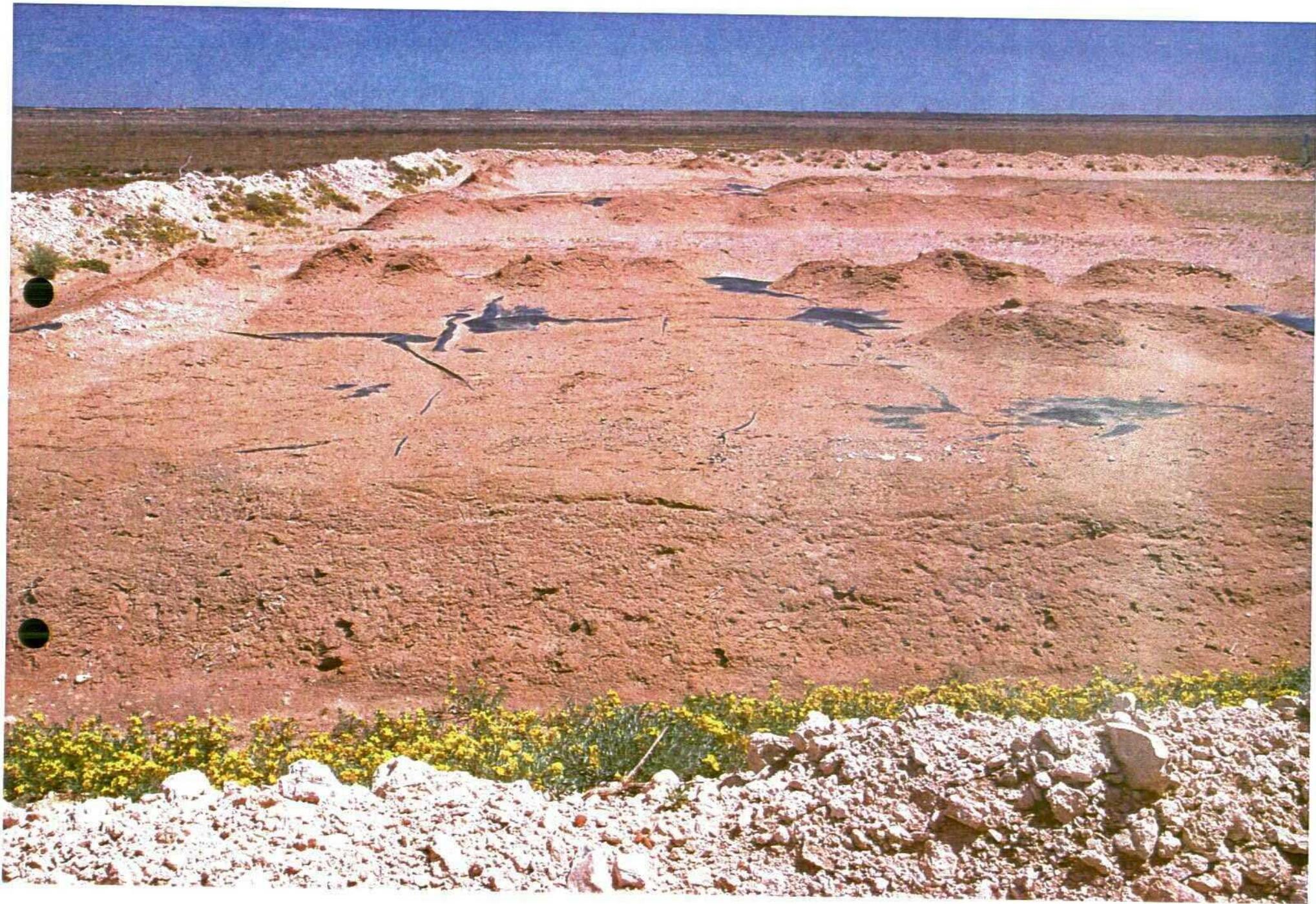


Pollackhide



Looking toward proposed land farm

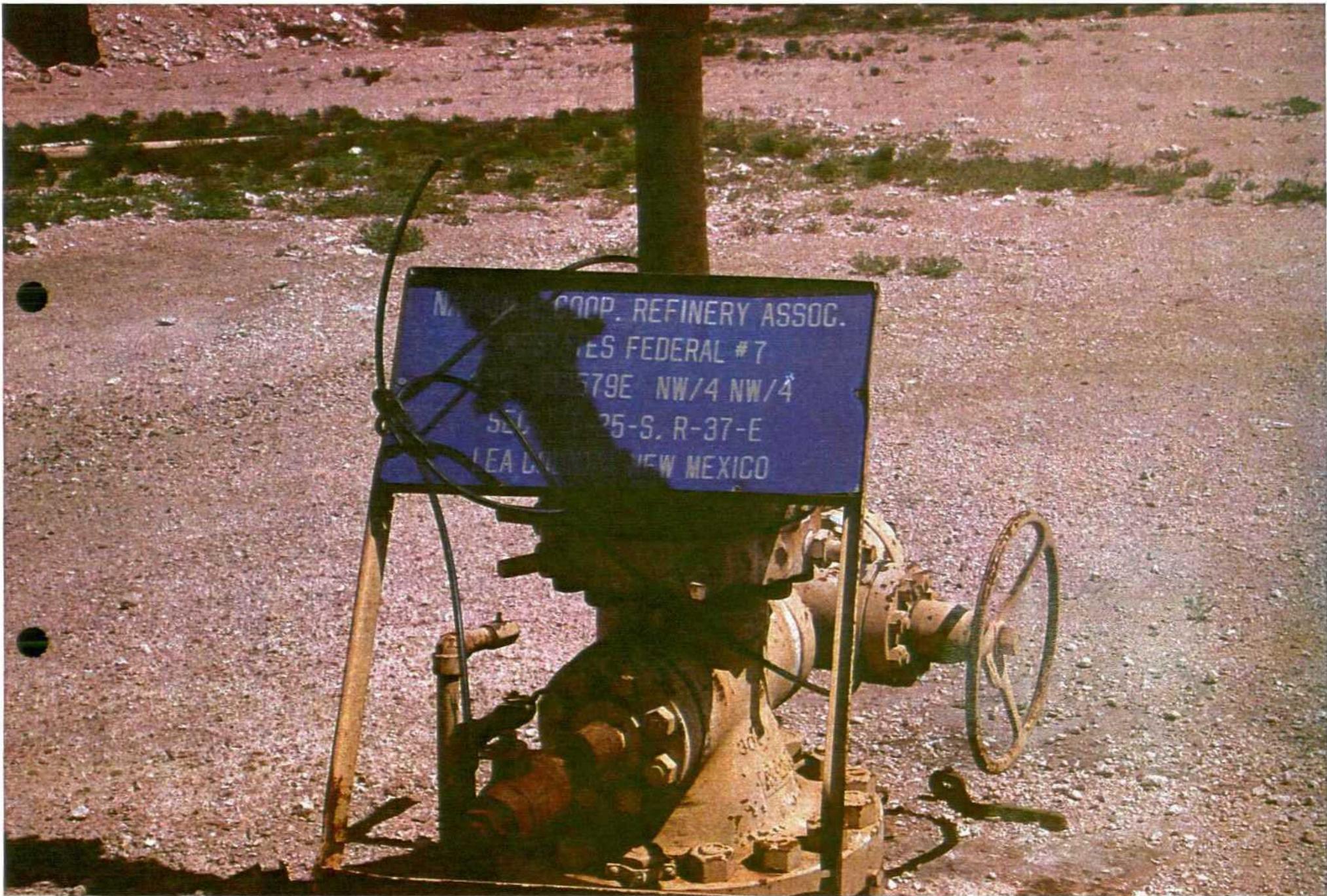
Pollack's



pollarhid



Pollack & Co

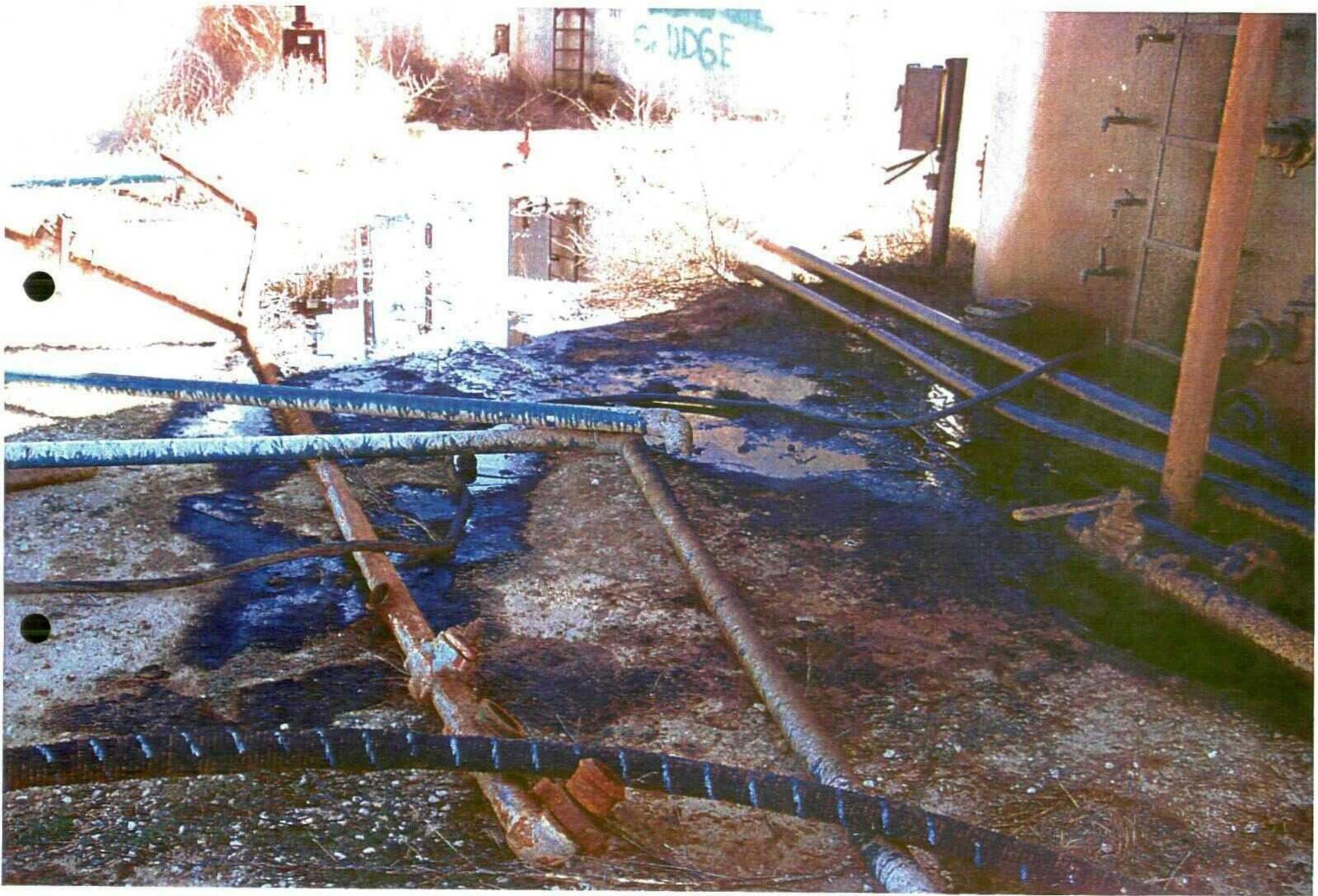


Dollarhide



Fresh H₂O well.

Dollanhide



monument

Valve missing from Tank BS
allowed to run into ground.



monument



mountain



illegal stockpiles of cuttings from previous centrifuge operations monument



mountain



no cement



10/3 Heavy Chlorides/BS

moment

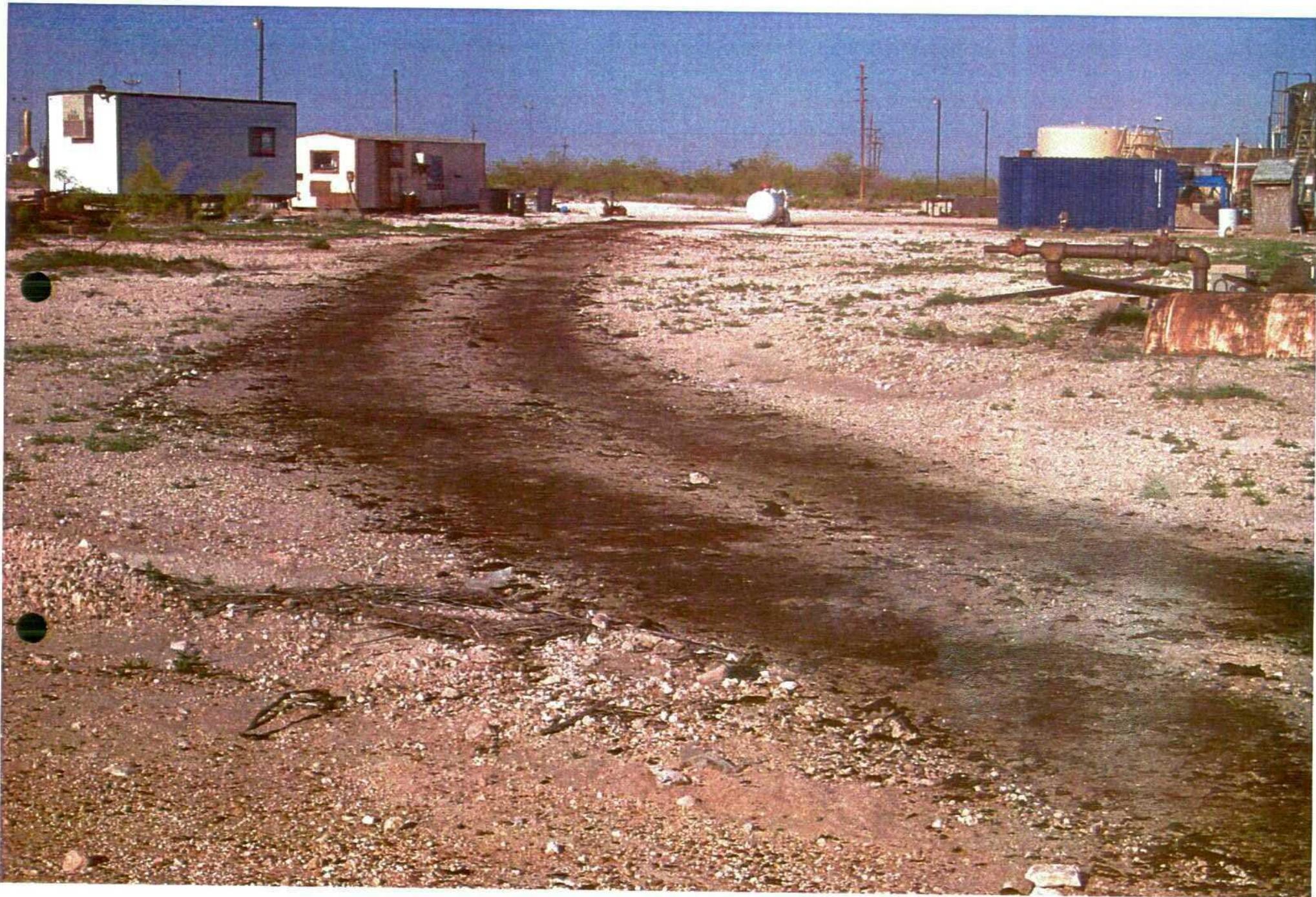


no overmant

commercial spraying machine



monument



monument



movement



Commercial Exchange - Accidental Tanks 2000 3-25-05
MONOMANT



MONUMENT

Commercial Exchange, Inc., Mr. Mark Goss, Operator, 6906 Gary Avenue, Lubbock, Tx 79413, has submitted for approval an application to construct and operate a Rule 711 commercial oil reclamation facility located in the NW/4 NW/4 of Section 1, Township 25 South, Range 37 East, N.M.P.M., Lea County, New Mexico. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be incorporated at the proposed site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division, 1220 South Saint Frances Drive, Santa Fe, New Mexico 87505, Telephone 505-476-3440. The application may be viewed at the above address or at the Hobbs district office at 1625 N. French Dr, Hobbs, New Mexico between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed application, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and any interested person may request public hearing. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

~~600~~

NM-1-44

Phone 505-395-2516

12-30-2004 265

The Jal Record
P.O. Drawer Y
Jal NM 88252

PLEASE USE THE ACCOUNT # TO THE
RIGHT OF DATE ON PAYMENTS.
QUESTIONS CALL 432-586-2498.

MARK GOSS
COMMERCIAL EXCHANGE INC
6906 GARY AVE.
LUBBOCK TX 79413

Date	Description	Amount
	Previous Balance	0.00
12/ 9/ 4	Legal Ad L-9662	31.50
12/16/ 4	Legal Ad L-9662	22.50
12/23/ 4	Legal Ad L-9662	22.50
12/30/ 4	Legal Ad L-9662	22.50

Current Balance - Pay This Amount 99.00

90 Days Overdue 0.00 60-90 Days Overdue 0.00 30-60 Days Overdue 0.00



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

December 2, 2004

Mr. Mark Goss
Commercial Exchange, Inc.
6906 Gary Avenue
Lubbock, TX 79413

Dear Mr. Goss:

The New Mexico Oil Conservation Division has received your Application For Waste Management Facility (OCD Form C-137), for the Blackwater Facility oil reclamation site, and it has been deemed administratively complete. NMOCD Rule 711 [NMAC 19.15.9.711 B. (2) (b)] states "The applicant will issue public notice in a form approved by the Division in a newspaper of general circulation in the county in which the facility is to be located". The format for this public notice is as follows:

Commercial Exchange, Inc., Mr. Mark Goss, Operator, 6906 Gary Avenue, Lubbock, TX 79413, has submitted for approval an application to construct and operate a Rule 711 commercial oil reclamation facility located in the NW/4 NW/4 of Section 1, Township 25 South, Range 37 East, N.M.P.M., Lea County, New Mexico. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be incorporated at the proposed site.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division, 1220 South Saint Frances Drive, Santa Fe, New Mexico 87505, Telephone 505-476-3440 The application may be viewed at the above address or at the Hobbs district office at 1625 N. French Dr, Hobbs, New Mexico between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed application, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and any interested person may request public hearing. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

Upon publication of the above notice, the public is allowed 30 days in which to submit comments on the application. **Please send me the affidavit of publication you receive**

from the newspaper. At the end of this period, barring any requests for a hearing, the application will be acted upon by the OCD and you will be notified of its decision.

If you have any questions, please contact me at (505) 476-3492 or emartin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Edwin E. Martin
Environmental Bureau

Cc: Larry Johnson, NMOCD, Hobbs
Eddie Seay, Hobbs

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-137
Revised March 17, 1999
Submit Original Plus 1
Copy to Santa Fe
1 Copy Appropriate
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

Commercial Centralized

NM-1-0044

1. Type: Evaporation Injection Other
 Solids/Landfarm Treating Plant

2. Operator: Commercial Exchange Inc. (Blackwater Facility)

Address: 6906 Gary Ave. Lubbock, TX 79413

Contact Person: Mark Goss Phone: (806)543-8187

3. Location: NW /4 NW /4 Section 1 Township 25S Range 37E
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? Yes No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

8. Attach a contingency plan for reporting and clean-up for spills or releases.

9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

12. Attach proof that the notice requirements of OCD Rule 711 have been met.

13. Attach a contingency plan in the event of a release of H₂S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Eddie W. Seay

Title: Agent

Signature: Eddie W. Seay

Date: 11-1-04

BLACKWATER FACILITY
NW 1/4 of the NW 1/4 Sect. 1, Tws. 25 S., R. 37 E.
Lea Co., NM

ATTACHMENT:

- 3) See attached plat.
- 4) No, this is not a modification.
- 5) Offset Landowner and Notices

State of New Mexico Land Office
310 Old Santa Fe Trail
Box 1148
Santa Fe, NM 87514-1148

Blocker Family Trust
Blocker Brothers, et al.
Box 744
Alto, NM 88312-0744

LANDOWNER

Joyce and George Willis
Box 307
Jal, NM 88252

COUNTY COMMISSIONER

Lea County Commissioner
ATTN: Darrell Stephenson
100 N. Main, Suite 4
Lovington, NM 88260

- 6) Diagram of facility attached.

The entire facility will be maintained so as to prevent leaks and spillage or be visible if an accidental discharge were to occur.

All tanks will be above ground and will have liners except the washout holding tank. This tank will be below grade exposed and on concrete so fluids can gravitate to tank and any leak or spill will be readily detected. The metal trough is for containment and spillage while trucks are cleaning out and unloading. If cleanout line were to leak, the fluids would accumulate in metal trough and vacuumed up immediately. The entire area will be bermed to prevent runoff and runon of fluids, and fenced. All piping will be above ground.

Any wastes that accumulates at the facility will be taken to an OCD approved facility.

7) Blackwater will have no pits, ponds, leak detection system, aeration system or spray system. All water treating will be in closed tanks. Security at the facility will be by fence, lock and key, and personnel on site. Blackwater has submitted a separate application for a landfarm operation.

8) Contingency Plan:

Blackwater will adhere to OCD rule 116 in notifying and cleaning up any fluid, break, spill, leak or blow out and any other circumstance that could constitute a hazard or contamination.

9) Blackwater will conduct daily inspections to ensure compliance, and conduct maintenance as needed. Inspection and maintenance logs will be kept for work performed at facility.

The Treating Plant Monthly Reports, form C-118, which details oil recovery and sold, will be submitted to OCD monthly with a copy in Blackwaters files for inspection purposes.

The Tank Cleaning Sediment Oil Removal, form C-117, will be submitted to OCD with copies kept in file.

All emergency phone numbers will be posted for employees with directions for notifications.

10) Closure Plan:

Closure will occur by notifying OCD in writing. All tanks and vessels will be cleaned and all waste hauled to an OCD approved facility with appropriate documentation. All tanks and vessels will be sold and/or removed from site. The treating plant site will be cleared of all fencing, the area remediated per OCD guidelines, berms leveled and area reseeded with grass native to the area.

Closure Cost:

Closure cost is consistent with a second party having to perform work.

Inventory:

7 tanks

1 frac tank

1 heater treater

5 acre site

1) Over site manager or coordinator

5 days @ \$250.00 per day

estimate

\$1,250.00

2) Norm survey	estimate	\$500.00
3) Fluids removal from tanks and disposal This includes water and BS & W All good oil will be sold and credited back	estimate	\$4,000.00
4) Tank cleaning Vacuum truck, jet wash and disposal	estimate	\$2,500.00
5) Remove tanks, piping, equipment and soil Sell any equipment that is salvageable.	estimate	\$6,000.00
6) Analytical for site characterization BTEX, TPH, Metals, Chloride and Radium 226 if NORM survey indicates.	estimate	\$4,000.00
7) Sampling and environmental labor	estimate	\$900.00
8) Prepare location and reseed	estimate	\$2,000.00
9) Contingency factor	estimate	\$1,500.00
Total Closure and Remediation	estimate	\$22,650.00
Tax - 6%	estimate	\$1,359
	TOTAL	<u>\$24,009.00</u>

11) Geological and Hydrological Information:

The proposed site is located NE of Jal, in the extreme southeastern corner of New Mexico. The area is relatively flat, sand covered surface, underlain by hard caliche.

The primary source of drinking water for this area is the alluvium and chinle formations. The depth normally occurs from 60 ft. to 500 ft. At and near our permitting area no water is found. Find within State Engineers water report and logs.

12) Requirement of Notice Attached.

13) Contingency for H2S Release:

Although no H2S is expected, Blackwater will have H2S monitors for employees and breathing equipment. Phone numbers for OCD and emergency personnel will be posted.

If a release of 1 ppm or greater H₂S leaves the property, the OCD will be notified and the source repaired.

If a release of 10 ppm or greater leaves the property, the OCD will be notified and associated public safety agencies:

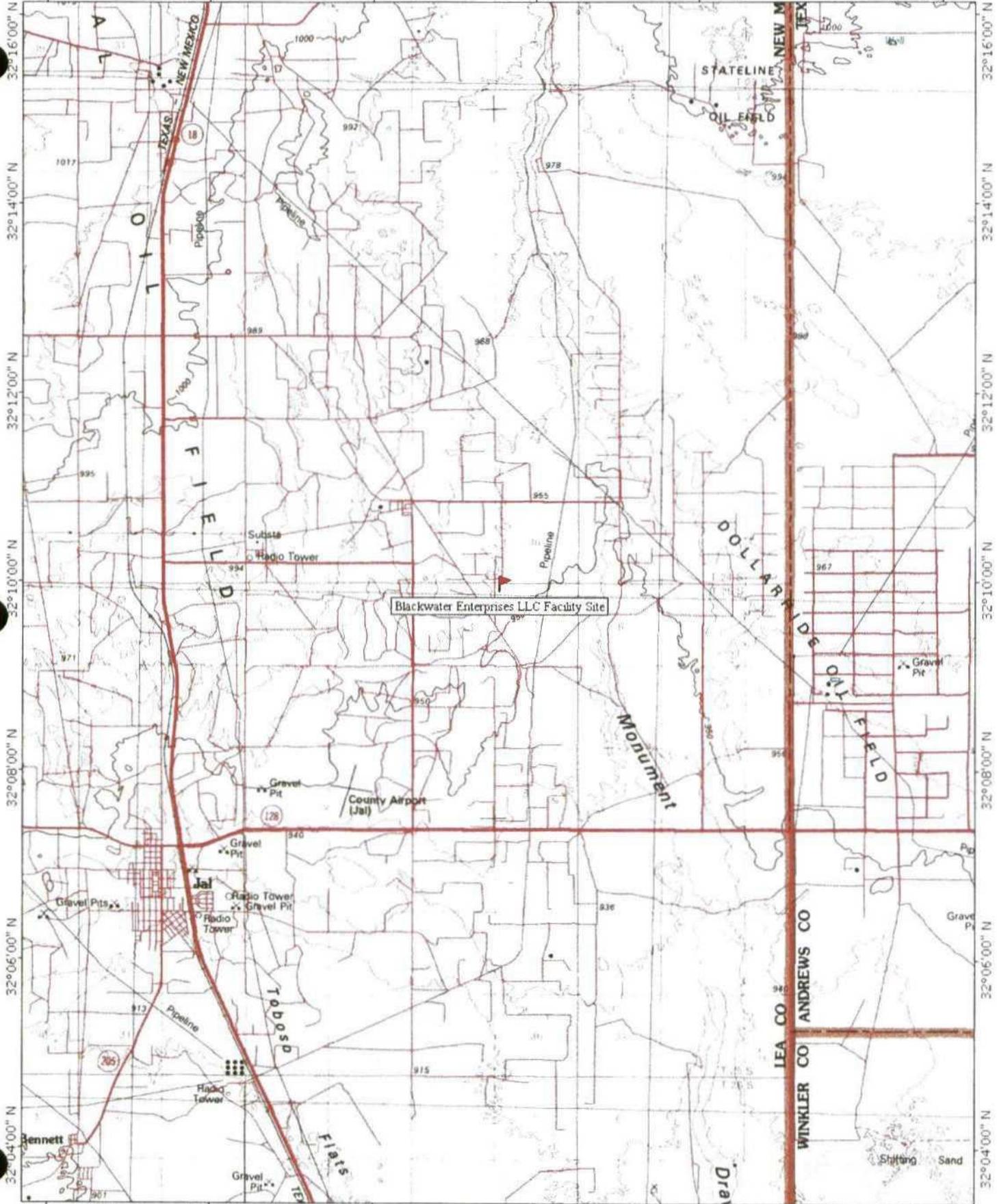
New Mexico State Police
Lea County Sheriff
Lea County Fire Marshall
Local Emergency Personnel

We will also notify all persons residing within one half mile of the site. (There are no residences within the area of review.)

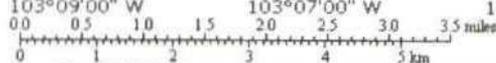
We will then begin work to correct the problem or release.

- 14) Commercial Exchange and Blackwater facilities will adhere to all applicable rules and regulations pertaining to this permit.
- 15) Certification.

103°13'00" W 103°11'00" W 103°09'00" W 103°07'00" W 103°05'00" W WGS84 103°02'00" W



103°13'00" W 103°11'00" W 103°09'00" W 103°07'00" W 103°05'00" W WGS84 103°02'00" W

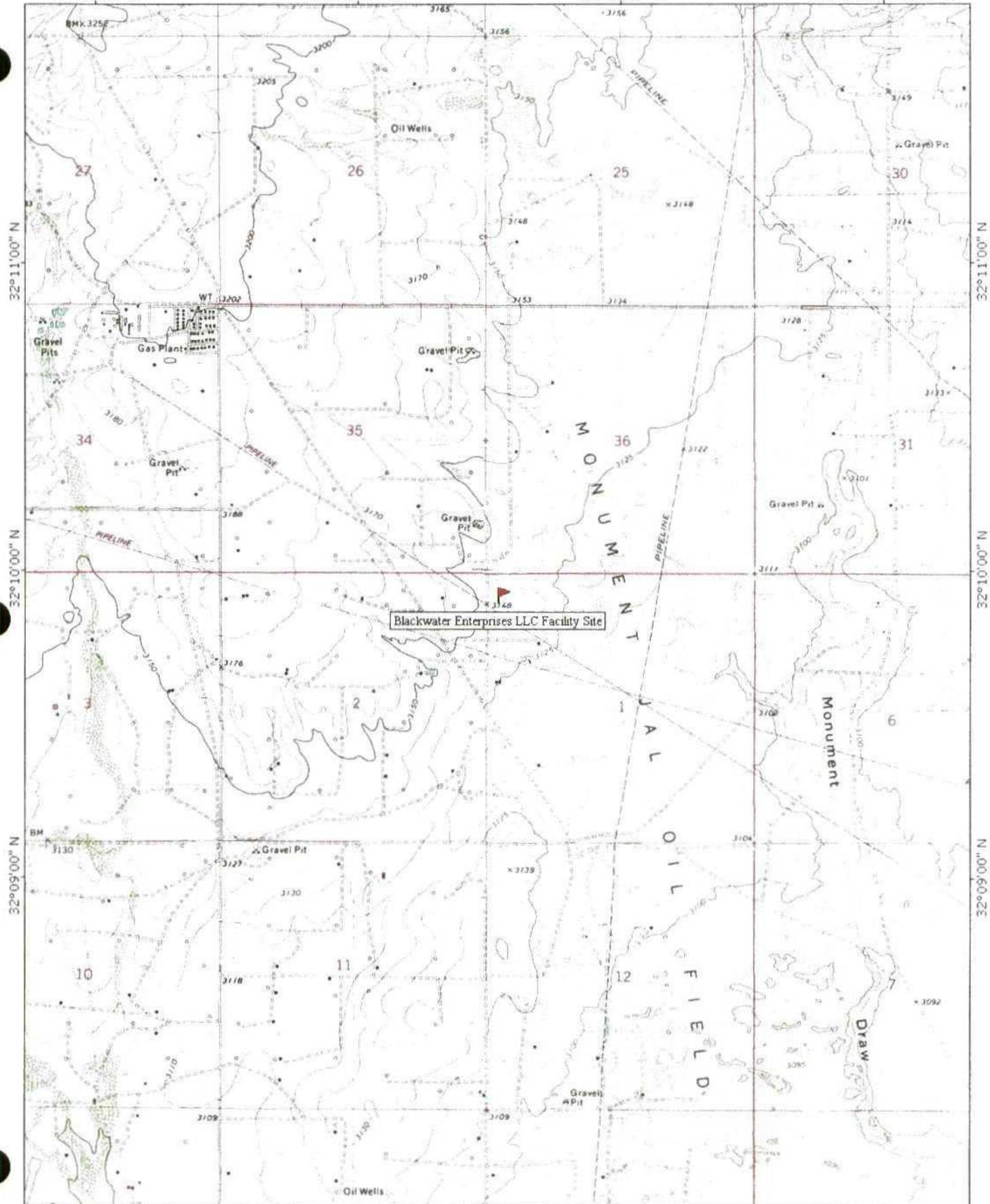


103°09'00" W

103°08'00" W

103°07'00" W

WGS84 103°06'00" W



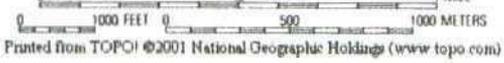
TN MN 8 1/2°

103°09'00" W

103°08'00" W

103°07'00" W

WGS84 103°06'00" W

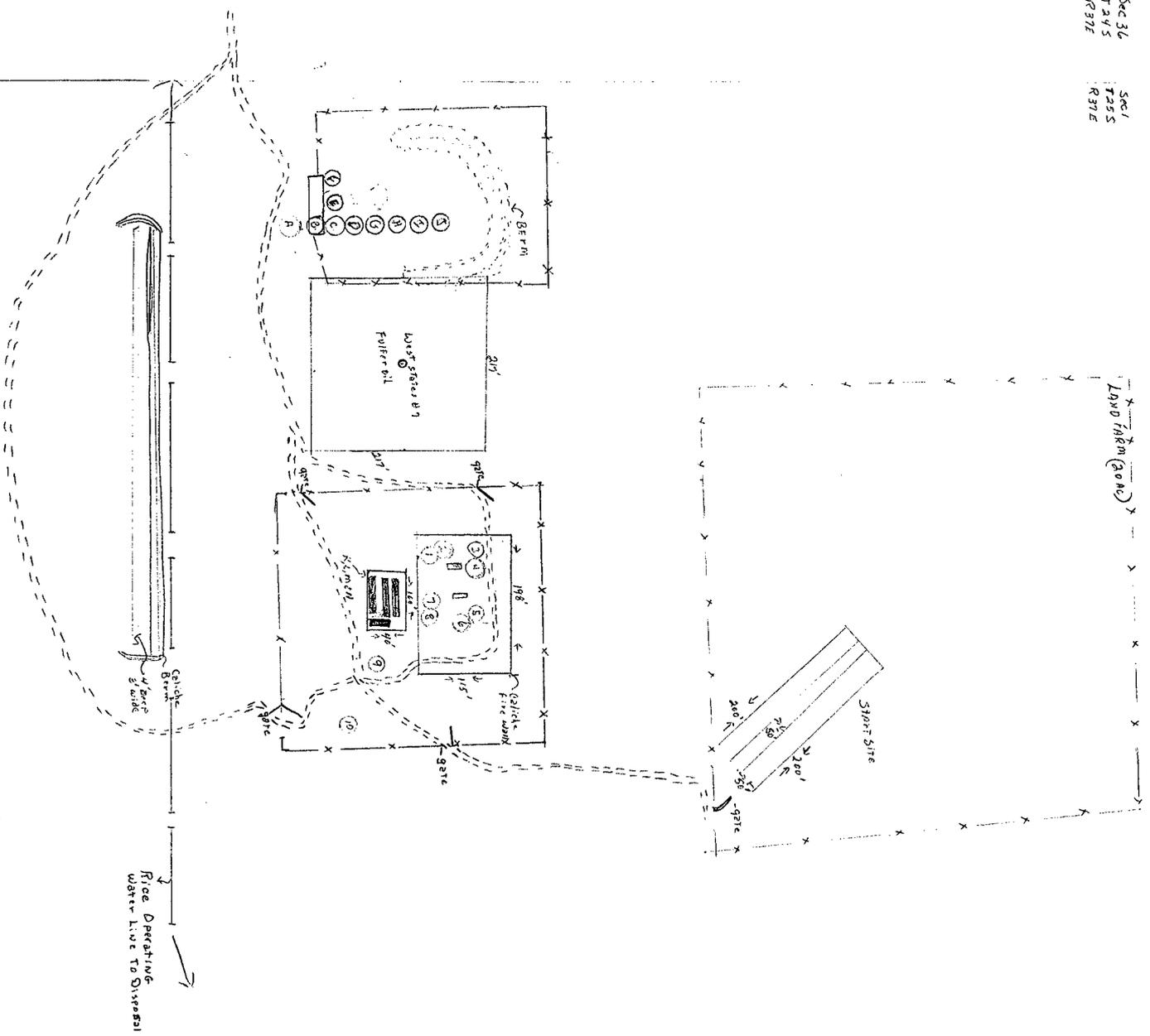


Printed from TOPOI ©2001 National Geographic Holdings (www.topo.com)

Sec 36
T 24 S
R 37 E

Sec 1
T 25 S
R 37 E

Land Farm (pond)



Sec 2
T 25 S
R 37 E

Waterline #7 Rd is 217' 50"

SCALE



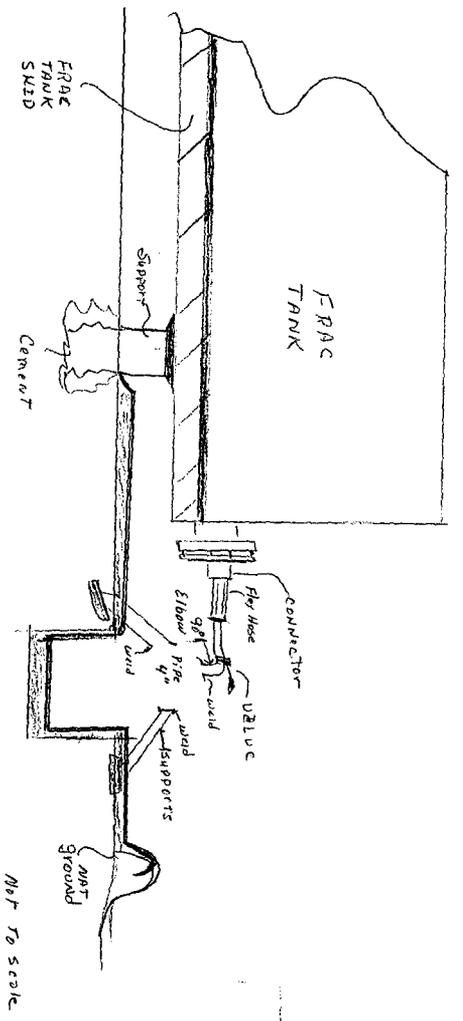
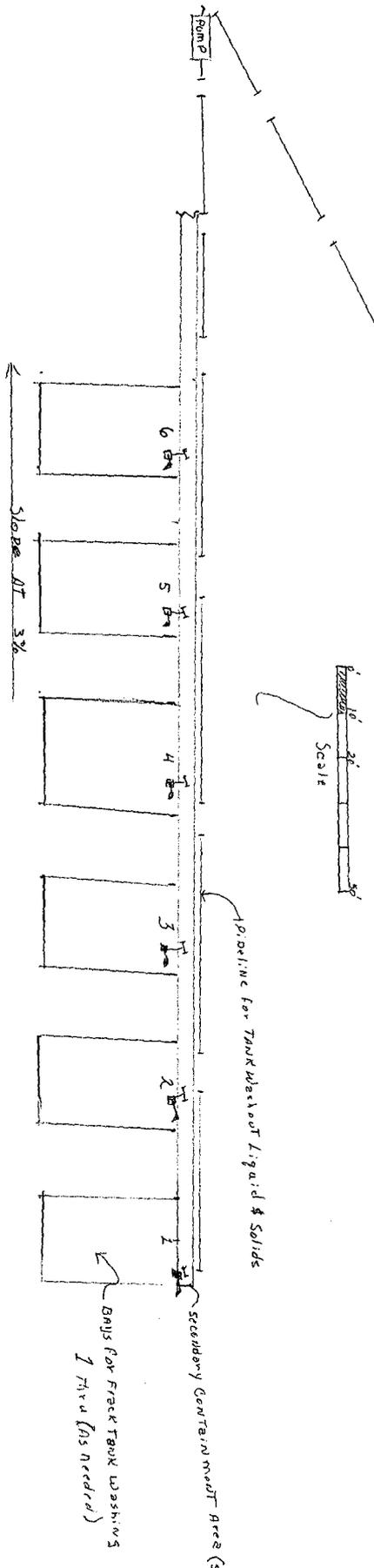
LEGEND

- A-750 BBL Steel Tank (Water-tail)
- BTC-400 BBL Steel Tank (Water-tail)
- E-300 BBL Oil Tank (Steel)
- E-350 BBL Steel Oil Tank
- D-T 500 BBL Steel Tank (Water)
- K,L,M,N Open Top Steel Pits (Biosolids)
- Unpaved Road
- x- Fence (Barbed Wire)
- Pipe/Line
- ▭ Centrifuge
- ▭ Disk Machine

General Note

TO BS&W UNITS

This Washout will NOT be holding water. All liquid and solids are pumped out as accumulated.
Drawn by George Willis.



Secondary Containment Area
WASH OUT ATTACHMENT DETAIL
NOT TO SCALE

New Mexico Office of the State Engineer
Well Reports and Downloads

Township: 25S Range: 37E Sections: 1

NAD27 X: Y: Zone: Search Radius:

County: Basin: Number: Suffix:

Owner Name: (First) (Last) Non-Domestic Domestic All

Well Surface Data Report Avg Depth to Water Report Water Column Report

Clear Form

WATERS Menu

Help

WELL / SURFACE DATA REPORT 07/06/2004

DB File Nbr (acre ft per annum) Use Diversion Owner Well Number

(quarters are 1=NW 2=NE 3=SW 4=SE) X Y are in Feet UTM are in
Source Tws Rng Sec q q q Zone X Y UTM_Zone

No Records found, try again

NOTICES

LANDOWNER

Joyce & George Willis
Box 307
Jal, NM 88252

OFFSET LANDOWNERS

State of New Mexico Land Office
310 Old Santa Fe Trail
Box 1148
Santa Fe, NM 87514-1148

Blocker Family Trust
Blocker Brothers et al
Box 744
Alto, NM 88312-0744

COUNTY COMMISSIONER

Lea County Commissioner
Attn: Darrell Stephenson
100 N. Main, Suite. 4
Lovington, NM 88260

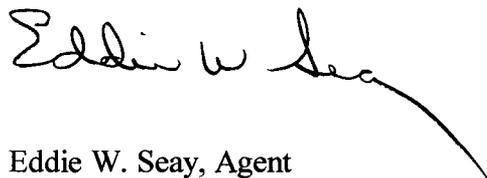
October 28, 2004

RE: Commercial Exchange Inc.
Blackwater Facility

Dear Sir:

I am providing you with notice that Commercial Exchange is filing application with the OCD for a treating plant permit. If you have any questions about the application you may call me at the phone number below.

Thanks,



Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88242
(505)392-2236
seay04@leaco.net

PUBLIC NOTICE

Pursuant to the rules and regulations of the Oil Conservation Division, Commercial Exchange Inc., operator Mark Goss, is submitting application to construct and operate a Rule 711 commercial treating plant reclamation facility. The facility is the Blackwater Facility located in NW 1/4 of the NW 1/4 of Section 1, Township 25 South, Range 37 East, N.M.P.M., Lea County, New Mexico. Tank bottoms, sediment and water (BS & W) associated with oil and gas production operations will be treated to recover marketable crude oil. The permit addresses the construction, operations, spill, leak prevention and monitoring procedures to be incorporated at the proposed site. Any questions about the facility can be addressed to Mark Goss at 1606 Gary Ave., Lubbock, Texas 79413 or (806)543-8187. Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at Box 6429, 1220 South Saint Francis Drive, Santa Fe, NM 87505, or phone (505)476-3440. The application may be viewed at the above address or at Hobbs OCD District office, 1625 N. French Dr., Hobbs, NM between 8:00 am and 4:00pm, Monday thru Friday. Prior to ruling on any proposed application, the Director of the OCD shall allow at least thirty (30) day after the date of publication of this notice during which comments may be submitted and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

7004 0750 0003 4821 8436

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.42

UNIT ID: 0640

Postmark Here

Clerk: KNFYPJ

10/29/04

Sent To **Blocker Family Trust**
Blocker Brothers, et al
 Street, Apt. No. or PO Box No. **Box 744**
 City, State, ZIP+4 **Alto, NM 88312-0744**

PS Form 3800, June 2002 See Reverse for Instructions

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Restricted Delivery Fee (Endorsement Required)	
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UNIT ID: 0640

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Clerk: KNFYPJ

10/29/04

Sent To **Lea County Commissioner**
ATTN: Darrell Stephenson
 Street, Apt. No. or PO Box No. **100 N. Main, Suite 4**
 City, State, ZIP+4 **Lovington, NM 88260**

PS Form 3800, June 2002 See Reverse for Instructions

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10/29/04

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 Street, Apt. No. or PO Box No. **Box 307**
 City, State, ZIP+4 **Jal, NM 88252**

PS Form 3800, June 2002 See Reverse for Instructions

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Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.42

UNIT ID: 0640

Postmark Here

Clerk: KNFYPJ

10/29/04

Sent To **State of NM Land Office**
110 Old Santa Fe Trail
 Street, Apt. No. or PO Box No. **Box 1148**
 City, State, ZIP+4 **Santa Fe, NM 87514-1148**

PS Form 3800, June 2002 See Reverse for Instructions