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**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

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2001-1997



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

March 2, 2001

**CERTIFIED MAIL**  
**Return Receipt # 3771 7170**

Mr. Kirk Staggs  
Pro Wireline  
P.O. 791  
Hobbs, NM 88241

Dear Mr. Staggs:

The New Mexico Oil Conservation Division (OCD) has received an inquiry from the New Mexico Environment Department concerning oilfield service company waste being disposed of at the Lea County Septic Tank Service facility which is currently permitted by the New Mexico Environment Department DP-884. This facility is not permitted to accept oilfield waste.

Audited records of the Lea County Septic Tank Service facility shows that your company has sent waste to this facility. You are hereby required to provide the OCD with a copy of all records that reflect waste being sent to this facility. Please include the process explaining how this waste was generated at your site.

Please provide this information by April 15, 2001.

If you have any questions please do not hesitate to contact me at 505-476-3490.

Sincerely;

A handwritten signature in black ink, appearing to read "Roger C. Anderson".

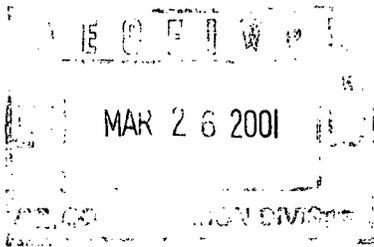
Roger C. Anderson  
Environmental Bureau Chief

Cc: OCD Hobbs Office  
NMED- Mary Noble

# PRO WELL TESTING & WIRELINE

P.O. Box 791  
Hobbs, New Mexico 88241-0791

Phone: (505) 397-3590  
Fax: (505) 393-3626



March 22, 2001

Mr. Roger Anderson  
NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT  
1220 South St Francis Dr.  
Santa Fe New Mexico 87505

Dear Mr. Anderson

Regarding your letter about Pro Well Testing & Wirelines wash bay waste, Lea County Septic Tank Service has probably disposed approximately 10 bbls of slug ,dirt and small amounts of hydrocarbons in the past two years.

This waste is generated from the washing of pick up trucks, wireline trucks and production testing equipment.

Mr. Anderson, in the future Pro Well Testing will use approved businesses from the OCD web page.

Mr. Anderson, we at Pro Well Testing will do what ever it takes to comply with your department regulations.

If you have any questions or comments please don't hesitate to contact me at 505-397-3590.

Sincerely;

A handwritten signature in cursive script that reads "Merv Buecker".

Merv Buecker  
VP



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
HOBBS DISTRICT OFFICE

POST OFFICE BOX 1880  
HOBBS, NEW MEXICO 88241-1880  
(505) 393-6161

April 24, 1997

Mr. Kirt Staggs-President  
Pro Well Testing & Wireline (PWTW)  
P.O. Box 791  
Hobbs, New Mexico 88241

*OGRI # 195482*

Re: Site Visit

Dear Mr. Staggs,

On April 23, 1997 New Mexico Oil Conservation Division (NMOCD) received a request by Mr. Buecker of your company for the NMOCD to make an on-site inspection of your facility in order so as your company may stay in compliance with the NMOCD regulations.

As per your request, please find below the following findings of the site inspection of April 24, 1997 in your presence and my resultant recommendations and/or requirements.

1. The company is an oilfield service company that supplies well testing and wireline service to the oil & gas industry.

The facility is located at 2815 Lovington Hwy. Hobbs, NM. It was previously occupied by Baber Well Service Co. It consist of a paved parking lot, office & warehouse building, and a fenced caliche covered yard.

The facility has an on site fresh water well and a septic system for the bathrooms. There were no present drains or sumps noted on-site. Presently PWTW is not connected to the nearby city of Hobbs POTW and water utilities service.

2. This facility is not permitted by the NMOCD.
3. PWTW is in the preliminary planning stages of installing a new washbay below grade sump for the collection of wash water generated from cleaning oilfield tools, and washing off vehicles, etc.

The fate of the final disposal of the waste generated from the future washbay has not been determined as of this date. PWTW is seeking guidance for this disposal.

**Recommendations and/or Requirements:**

1. All new below-grade tanks, sumps and pits must be approved by the NMOCD prior to installations and must incorporate secondary containment and leak-detection in their designs.
2. All waste generated on-site shall be classified and a waste determinations should be made to determine if such waste are RCRA hazardous waste. The disposal of all waste requires NMOCD approval.

As per your request please find a copy of the list of NMOCD approved disposal facilities in this area.

3. The disposal of RCRA non-exempt service company waste will not be allowed to be disposed of into a EPA type Class II disposal well i.e. salt water disposal well (SWD). Please find EPA memorandum and "Clarification on Service Companies" Fed. Reg. Vol. 58. No.53 3/22/93 attached disallowing such activities.
4. The issue of PWTW disposing of waste water into or at the city of Hobbs POTW is a viable option. Please check with the City of Hobbs for their pre-treatment requirements.
5. The Issue of PWTW obtaining a NMOCD Discharge Plan Permit will be determined by the NMOCD Santa Fe Environmental Bureau. All Discharge Plan Permits are handled out of our Santa Fe office.

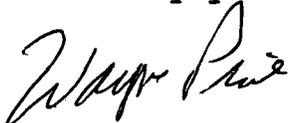
In order to assist you in your facility design I have included a copy of the NMOCD Guidelines for the preparation of discharge plans and a facility checklist.

Please note if PWTW wishes to apply for a permit they may do so.

6. All leaks and spills at oilfield service companies shall be reported to the NMOCD pursuant to WQCC and OCD rules. Please find a copy of the C-141 form for reporting leaks and spills.

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  
Roger Anderson-NM NMOCD Environmental Bureau Chief, Santa Fe

attachments-5