

1R - 391

**GENERAL
CORRESPONDENCE**

YEAR(S):

2003 - 2004

Price, Wayne

From: Price, Wayne
Sent: Tuesday, March 16, 2004 2:01 PM
To: Wrottenbery, Lori
Cc: Anderson, Roger
Subject: FW: Pure Resources Well 106 flow line area 1R0391

This is the flow line area that we inspected during our Bus Tour of the well field. Approximately 5000 yard of contaminated soil has been removed and disposed of at an OCD approved site and will be backfilled with clean soil and reseeded.

-----Original Message-----

From: Price, Wayne
Sent: Tuesday, March 16, 2004 1:26 PM
To: Eddie Seay (E-mail)
Cc: Pat Wise (E-mail); Johnson, Larry
Subject: Pure Resources Well 106 flowline area 1R0391

Dear Mr. Seay:

The OCD is in receipt of the closure plan for the above site. OCD hereby approves of the plan with the following conditions:

1. Please supply photos after excavation area has been backfilled and reseeded.
2. Please be advised that NMOCD approval of this plan does not relieve (Pure Resources) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Pure Resources) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 21, 2003

Mr. Mike Northcutt
Pure Resources
P.O. Box 609
Lovington, New Mexico 88260

Subject: **Contamination from Oil Field Operations**

The New Mexico Oil Conservation Division (OCD) recently received a complaint from the City of Lovington New Mexico concerning surface contamination at two Pure Resources (Pure) facilities, the Lovington Paddock well #21 and well #106 flow line leak sites located in Sec 36-Ts 16s-R 36e. The city owns approximately 1800 acres of land in this area where its fresh water wells are located.

At the request of the City, the OCD conducted a joint inspection with City of Lovington officials and noted several deficiencies (see attached inspection report). Based on the following findings, OCD requires Pure Resources to perform corrective actions as listed below.

A. Well site # 21 located in SW/4 NE/4 Sec 36-Ts 16s-R 36e:

Finding:

Pure was performing corrective actions on this site.

Additional Corrective Action Required:

Pure Resources shall submit a closure plan for OCD approval by December 03, 2003. This plan shall be submitted and approved by OCD before Pure backfills any remaining excavated areas. The plan shall include bottom and side wall soil sample analysis for TPH, BTEX and chlorides. The plan shall describe in detail all activities to date, including the disposal of any contaminated soils.

B. Well site # 106 located in UL E Sec 36-Ts 16s-R 36e:

Findings:

1. Visual contamination that exhibited gross oil staining was noted on the ground surface. The soil exhibited a strong hydrocarbon odor. The spill had been covered with sand.
2. Another disturbed area in close proximity to the one mentioned above was noted. It appeared that some surface bioremediation had taken place.

Corrective Action Required:

1. Pure Resources shall make notification and perform corrective actions on all future leaks and spills pursuant to 19.15.C.116 NMAC and abide by all OCD rules and regulations.
2. Pure Resources shall immediately stop all releases of oilfield products or waste, make repairs to equipment to prevent future releases, and install best management practices where feasible.
3. Pure Resources shall submit an action plan for OCD approval by December 15, 2003. The plan shall describe how Pure Resources plans to correct the problems OCD found, including a clean up and remediation plan, and a plan to determine the extent of contamination at the site.
4. Pure Resources shall submit evidence that OCD Rule 118 (Hydrogen Sulfide) H₂S is being adhered too.

If you have any questions please do not hesitate to contact me at 505-476-3487 or WPRICE@state.nm.us.

Sincerely;



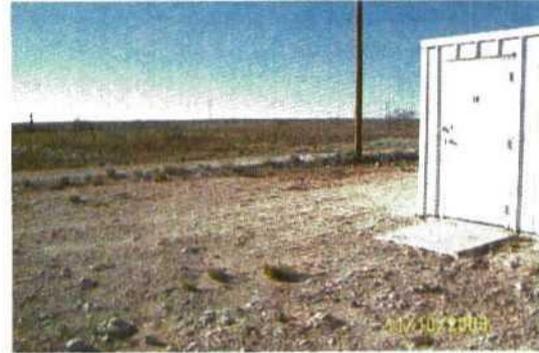
Wayne Price-Pet. Engineer

cc: OCD Hobbs Office

Attachments-2



Picture # 1489- Flow line leak site 300 feet west of Lovington City water well #18. Picture looking west. At time of visit soil had a distinct hydrocarbon odor and exhibited gross staining. Most of the spill area was covered with sand.



Picture # 1492- Lovington city water well #18.



Picture # 1490 - From 35 feet south of abandoned flow line and clamp next to flow line. Area has been covered with sand.



Picture # 1493-View of flow line from west side of city well #18 looking west.



Picture 1491- From 300 feet west of Lovington city water well #18 looking WNW.



Picture # 1494 - Flow line comes from this well.

November 18, 2003

Mr. Mike Northcutt
Pure Resources
P.O. Box 609
Lovington, New Mexico 88260

Subject: **Contamination from Oil field Operations**

The New Mexico Oil Conservation Division (OCD) recently received a complaint from the City of Lovington New Mexico concerning surface contamination at two Pure Resources (Pure) facilities, the Lovington Paddock well #21 and well #106 flow line leak sites located in Sec 36-Ts 16s-R36e. The city owns approximately 1800 acres of land in this area where their fresh water wells are located.

At the request of the City, the OCD conducted a joint inspection with city of Lovington officials and noted several deficiencies (see attached inspection report). Based on the following findings, OCD requires Pure Resources to perform corrective actions as listed below.

A. Well site # 21 located in SW/4 NE/4 Sec 36-Ts 16s-R 36e:

Finding:

Pure was performing corrective actions on this site. The OCD has no record of approving the corrective action plan.

Corrective Action Required:

Pure Resources shall submit a closure plan for OCD approval by November 28, 2003. This plan shall be submitted and approved by OCD before Pure backfills any remaining excavated areas. The plan shall include bottom and side wall soil sample analysis for TPH, BTEX and chlorides. The plan shall describe in detail all activities as of to date, including the disposal of any contaminated soils.

B. Well site #106 located in U/L/E Sec 36-Ts 16s-R 36e:

Findings:

1. Visual contamination that exhibited gross oil staining was noted on the ground surface. The soil exhibited a strong hydrocarbon odor. The spill had been covered with sand.
2. Another disturbed area in close proximity to the one mentioned above was noted. It appeared that some surface bioremediation had taken place.

Corrective Action Required:

1. Pure Resources shall make notification and perform corrective actions on all future leaks and spills pursuant to 19.15.C.116 NMAC and abide by all OCD rules and regulations.
2. Pure Resources shall immediately stop all releases of oilfield products or waste, make repairs to equipment to prevent future releases, and install best management practices where feasible.
3. Pure Resources shall submit an action plan for OCD approval by December 15, 2003. The plan shall describe how Pure Resources plans to correct the problems OCD found, including a clean up and remediation plan, and a plan to determine the extent of contamination at the site.
4. Pure Resources shall submit evidence that OCD Rule 118 (Hydrogen Sulfide) H₂S is being adhered too.

If you have any questions please do not hesitate to contact me at 505-476-3487 or e-mail WPRICE@state.nm.us.

Sincerely;

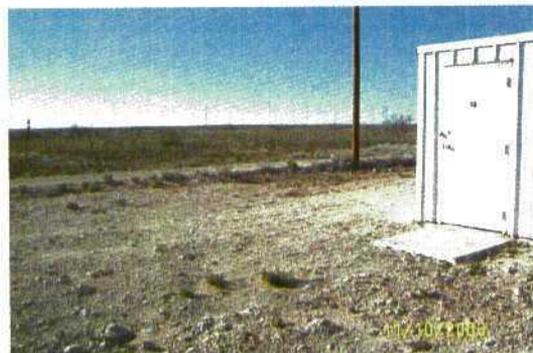
Wayne Price-Pet. Engineer

cc: OCD Hobbs Office

Attachments-2



Picture # 1489- Flow line leak site 300 feet west of Lovington City water well #18. Picture looking west. At time of visit soil had a distinct hydrocarbon odor and exhibited gross staining. Most of the spill area was covered with sand.



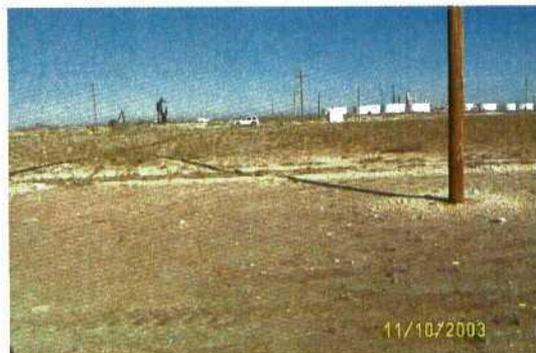
Picture # 1492- Lovington city water well #18.



Picture # 1490 - 35 feet south of 2 3/8 " abandon flow line and clamp next to flow line. Area has been covered with sand.



Picture # 1493-view of flow line from west side of city well #18 looking west.



Picture 1491- 300 feet west of Lovington city water well #18 looking WNW.



Picture # 1494 - flow line comes from this well.