

P&S Brine

P & S BRINE SALES
LIMITED PARTNERSHIP

P.O. BOX 1769
EUNICE, NEW MEXICO 88231

RECEIVED
FEB 12 1998
MINING & MINERALS DIV.

February 10, 1998

State of New Mexico
Energy, Minerals & Natural Resources Dept.
2040 South Pacheco
P. O. Box 6429
Santa Fe, New Mexico 87505-5472

Re: Discharge Plan BW-007 and UIC-CLI-006
Class I Cavern Disposal Well
Lea County, New Mexico

Dear Ms. Garland:

As per instructions in the enclosed letter, we wish to withdraw the
Class I cavern disposal well discharge plan application.

Thank you for your time and attention in this matter.

Sincerely,



Paul Prather
Owner



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 4, 1998

Certified Mail

Return Receipt No. P-288-259-012

Mr. Paul Prather
P&S Brine Sales
P.O. Box ~~7169~~ 1769
Eunice, New Mexico 88231

**RE: Discharge Plan BW-007 and UIC-CLI-006
Class I Cavern Disposal Well
Lea County, New Mexico**

Dear Mr. Prather:

The New Mexico Oil Conservation Division (OCD) has reviewed the P&S Brine Sales (P&S) discharge plan application to convert the existing Class II brine well (BW-007) to a Class I cavern disposal well (UIC-CLI-006). Pursuant to Water Quality Control Commission (WQCC) 3109.A and 3109.G.3 the P&S application is hereby disapproved based on the following information:

1. The Lewis B. Burleson, Inc., ARCO No. 2, located in Section 21, Township 25 South, Range 37 East, Lea County, New Mexico, reported lost circulation in the same formation (Salado formation) the P&S brine well operates.
2. The ARCO Permian, South Justice Unit C-190, located in Section 23, Township 25 South, Range 37 East, Lea County, New Mexico, reported lost circulation in the same formation (Salado formation) the P&S brine well operates.
3. P&S did not provide the OCD with evidence demonstrating that there is no communication between the two above mentioned wells and the P&S brine well. Furthermore, P&S did not demonstrate to the OCD that there will be no migration of wastes from the proposed disposal cavern in the foreseeable future.

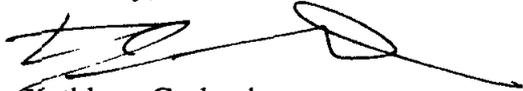
P&S has until March 9, 1998 to respond to the OCD with one of the following options:

1. Pursuant to WQCC 3112 P&S may appeal the OCD decision to the WQCC.
2. P&S may withdraw the Class I cavern disposal well discharge plan application.

Mr. Paul Prather
 February 4, 1998
 Page 2

If you have any questions, please feel free to contact Mark Ashley at (505) 827-7155.

Sincerely,



Kathleen Garland
 Acting Director

KAG/mwa

xc: OCD Hobbs Office

Is your RETURN ADDRESS completed on the reverse side?	SENDER:		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	<ul style="list-style-type: none"> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered. 		
3. Article Addressed to:		4a. Article Number	Using Return Receipt Service.
PAUL PRATHER P+S BRIVE SALES P.O. BOX 2169 1769 EMMICK, NM 88231		P-288-259-012	
4b. Service Type		<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name)		7. Date of Delivery	
MARK VIC-CLI-006		2-9-98	
6. Signature: (Addressee or Agent)		8. Addressee's Address (Only if requested and fee is paid)	
X Helen Holt			

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

P 288 259 012

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, Kathi Bearden

Publisher

of the Hobbs Daily News-Sun, a daily newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of _____

1 weeks.

Beginning with the issue dated

May 19, 1996

and ending with the issue dated

May 19, 1996

Kathi Bearden

Publisher

Sworn and subscribed to before

me this 22 day of

May, 1996

Sandra Collett

Notary Public.

My Commission expires

August 29, 1999

(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL NOTICE

May 19, 1996

PUBLIC NOTICE

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES
DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that a public meeting will be held to solicit input regarding the following discharge plan applications, for disposal of oil field waste into the Salado Formation, that have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-226) - Permian Brine Sales, A. L. Hickerson, 6067 W Tenth, Odessa, Texas 79763, has submitted a discharge plan application for disposal of non-hazardous semi-solid oil field waste in abandoned salt caverns located in the SE/4 SE/4 of Section 34, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 5,000 barrels per day of non-hazardous oil field waste slurry will be injected down the tubing of the salt cavern, approximately 2,500 feet, and brine will be produced up the annulus for sale. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3000 mg/l. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and how spills, leaks, and other accidental discharges to the surface will be managed.

(UIC-CL1-006) - P. & S. Brine Sales, Paul Prather, P.O. Box 1768, Eunice, New Mexico, 88231 has submitted a discharge plan application for disposal of non-hazardous oil field waste in salt caverns located in Section 16, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. Currently, under discharge plan BW-007, fresh water is injected through the casing of the Arnott Ramsey State No.4 into the Salado Formation at an approximate depth of 1,260 feet and brine is extracted through the tubing. The average total dissolved solids concentration of the brine is approximately 290,000 mg/l. The discharge plan application proposes to reenter the previously plugged Arnott Ramsey State No. 3 brine well to allow for the injection of approximately 2,500 barrels per day of non-hazardous oil field waste slurry. Injection will be through the tubing into the existing salt cavern to approximately 1,582 feet. The Arnott Ramsey State No. 4 will be used for brine returns through the tubing. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 400 feet with a total dissolved solids concentration of approximately 1,025 mg/l. Pockets of ground water may exist in the area at depths as shallow as 50 feet, with higher or lower total dissolved solids concentrations. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other accidental discharges to the ground surface.

The public meeting will be held at the New Mexico Junior College, Bob Moran Multi-Purpose meeting room, on May 28, 1996 at 3:00 PM. Any interested person may attend to present comments. Written requests may be submitted to the Director of the Oil Conservation Division at the address given above.
#14562

Memo

From

ROGER ANDERSON
Environmental Engineer

To

3-15-96

Over Brumminstool

*low air zone -
several years ago could not get
returns*

3/15/96

PS - Brine Well

Dear Jan.

915-586-3431

Bill Webb

PUBLIC NOTICE
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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OIL CONSERVATION DIVISION
RECEIVED

'96 APR 30 AM 8 52

State of New Mexico
Commissioner of Public Lands

RAY POWELL, M.S., D.V.M.
COMMISSIONER

310 OLD SANTA FE TRAIL P.O. BOX 1148

SANTA FE, NEW MEXICO 87504-1148

(505) 827-5760
FAX (505) 827-5766

April 29, 1996

New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Attention: William J. LeMay, Director

Re: (UIC-CL1-006) P. & S. Brine Sales- Sec. 16, T-25-S, R-37-E
(GW-226) Permian Brine Sales- Sec. 34, T-19-S, R-36-E

Dear Mr. LeMay:

The Commissioner of Public Lands objects to the approval of the above applications for disposal of non-hazardous oil field waste in salt caverns in conjunction with the production of brine. These facilities would be located adjacent to, and on lands managed by the Commissioner. The objection is based on the following factors:

Although Oil Conservation Division (OCD) Rules 19 NMAC 15.1 701 - 708 regulate operation and maintenance of injection activities for secondary or enhanced recovery, pressure maintenance, salt water disposal, and underground storage of material, there are no design standards for qualification of salt caverns for waste disposal. OCD rules and standards should be developed prior to approval of applications, and should address siting, operation, maintenance, and performance requirements for waste disposal in salt caverns. These standards must be developed to prevent migration of waste or contamination of brine produced for sale from the operations.

The Interstate Oil and Gas Compact Commission (IOGCC) publication, "Natural Gas Storage in Salt Caverns - A Guide for State Regulators," specifically addresses gas storage in salt caverns, setting out principles and guidelines for the safe containment of natural gas in these facilities. The same principles and technical guidelines applied to the disposal of waste materials would minimize risks, ensure integrity of the cavern, and protect ground water. None of the IOGCC criteria for ensuring cavern integrity, maintenance or monitoring have been addressed in OCD regulations or the applications. The OCD does not currently require, and the applicants have not submitted, a closure plan that includes a demonstration of stability for the abandoned

cavern or sonar surveys for determination of the initial and final shapes, and areal extent of the caverns. This information should be required for the protection of human health and welfare.

In addition, no modeling has been performed to predict the impact of waste disposal on the quality and value of the mined salt. This issue is important for royalty owners and developers of the mineral resource.

Salt caverns may provide excellent storage for natural gas or secure disposal for wastes, but without adequate regulatory planning and control, situations will occur that will be beyond the ability of the operators or the state to remediate. Specifically, I would like to remind you of the uncontrolled water flows in the Salado Formation in the Vacuum Field, and in and around waterfloods in the Eunice, Oil Center, and Monument areas. These water flows, proximate to the applications and located within the same formation as the subject salt caverns, were the topic for numerous meetings between the OCD and the Vacuum Field Salt Water Flow Committee in 1986-1987, and other groups in the 1970's.

After years of study, thousands of pressure tests, installation of pressure monitoring wells, and chemical analyses, the Committee decided that the water flows were not composed of connate water. However, no one knew the origin of the early flows, or specifically where the water was stored that gave rise to the strong, intermittent and spotty water flows that could collapse casing and then inexplicably stop. Individual flows were correlated to distinct horizons within the Salado Formation where fluid flow was facilitated along bedding planes at clastic-evaporite interfaces. Chemical dissolution of bounding salts and mechanical fracturing enabled large volumes of fluids to be transported over large areas. The subject salt caverns located in the Salado Formation are in the vicinity of numerous secondary recovery units, which cumulatively have injected millions of barrels of water over the past years.

This example of historical problems is presented to underscore the lack of understanding of fluid dynamics within the waste injection formation, and to strongly encourage the OCD to examine the regulatory framework necessary for safe containment for subsurface waste disposal. The Commissioner's protest of approval of the applications is based on a concern of failure to safeguard human health and the environment.

Sincerely,



Larry Kehoe, Assistant Commissioner
Mineral Resources

LK/jb

WILLIAM H. BRININSTOOL

(505) 395-2010

DRAWER A

JAL, NEW MEXICO 88252

OIL CONSERVATION DIVISION
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'96 MAR 18 AM 8 52

March 15, 1996

State of New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Attention: William J. LeMay, Director

Re: UIC-CL1-006, P. & S. Brine Sales

Dear Director LeMay:

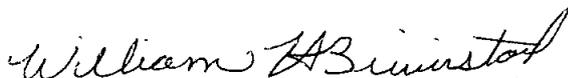
I would like to request the Oil Conservation Division to deny P. & S. Brine Sales application permit number (UIC-CL1-006) for disposal of oil field waste.

If request for denial is not granted, I would request a public hearing be conducted by the State of New Mexico Oil Conservation Commission. A hearing would allow the citizens of Jal and South Lea County to review all the facts concerning this application to determine the environmental impact and the safety and health of our citizens.

Concerns that I have are the fresh water, an unstable salt section, loss circulation zone, and cavity integrity.

Please accept this letter as a formal protest. If a public hearing is scheduled, I would appreciate notice of the date, time, and location. I will present testimony and provide supporting documentation.

Cordially,

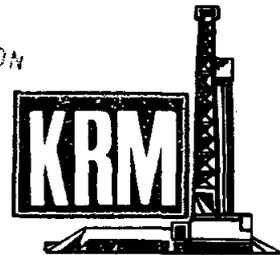


William H. Brininstool
Owner



K R M
P. O. BOX 1832
HOBBS, NEW MEXICO 88241

OIL CONSERVATION DIVISION
RECEIVED
1996 MAR 18 AM 8 52



March 15, 1996

Mr. William J. Lemay
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico

Dear Mr. Lemay:

Please accept my request for a public hearing on the issue of P & S Brine Sales for disposal of oil field waste in salt caverns in Lea County New Mexico.

This notice of publication was issued on February 21, 1996.

I will be furnishing information concerning this issue to your environmental bureau for their review.

I am acting on behalf of individuals and companies who have high levels of concern about this matter.

Sincerely,


Ken Marsh

OIL CONSERVATION DIVISION
RECEIVED

'96 MAR 18 AM 8 52

March 15, 1996

Mr. William J. LeMay
State of New Mexico
Energy, Minerals and Natural
Resources Department
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: (UIC-CL1-006) P. & S. Brine Sales

Dear Mr. LeMay:

Please accept this letter as a formal protest. I know that this well has had a terrible track record. If a full historical study of the previous owners is made you will find migration problems past and present.

We can not tolerate more pollution to domestic water wells. If you have a formal hearing I would like to be notified.

Sincerely,



Darrold Stephenson
P. O. Box 749
Jal, New Mexico 88252

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

March 15, 1996

MR. WILLIAM J. LEMAY
State of New Mexico
Energy, Minerals and Natural
Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: (GW-226) Permian Brine Sales
(UIC-CL1-006) P & S Brine Sales

Dear Mr. LeMay:

On behalf of Controlled Recovery, Inc. I respectfully request the referenced permit applications be denied.

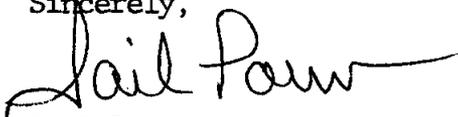
As a Lea County business owner and taxpayer, Controlled Recovery, Inc. is extremely concerned about the possibility of waste disposal into a salt cavern. I believe this disposal method would have a negative impact on surrounding property owners in Lea County, New Mexico. The salt cavern(s) could develop leaks and possibly collapse allowing migration of waste into the precious and irreplaceable water aquifer. Any damage to the underground water supply would most likely cause health and safety risks for all persons in this region of New Mexico.

If my request to deny these applications is not implemented, I respectfully request a public hearing to review these applications be conducted by the Oil Conservation Commission. Please enter Controlled Recovery, Inc. (Gail Power) as a registered protestant in these cases.

If a hearing is held, I intend to present testimony and supporting documentation to express my opposition to both of these permit applications.

Please advise time and place of hearing if applicable.

Sincerely,



Gail Power

GP/jh

OIL CONSERVATION DIVISION
RECEIVED
96 MAR 18 AM 8 52

OIL CONSERVATION DIVISION
RECEIVED

1996 MAR 18 AM 8 52

March 15, 1996

Kenn Mosley

Box 223

Sal, Nm 58252

State of New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Attention: William J. LeMay, Director

Re: UIC-CL1-006, P. & S. Brine Sales

Dear Director LeMay:

I would like to request the Oil Conservation Division to deny P. & S. Brine Sales application permit number (UIC-CL1-006) for disposal of oil field waste.

If request for denial is not granted, I would request a public hearing be conducted by the State of New Mexico Oil Conservation Commission. A hearing would allow the citizens of Jal and South Lea County to review all the facts concerning this application to determine the environmental impact and the safety and health of our citizens.

Concerns that I have are the fresh water, an unstable salt section, loss circulation zone, and cavity integrity.

Please accept this letter as a formal protest. If a public hearing is scheduled, I would appreciate notice of the date, time, and location. I will present testimony and provide supporting documentation.

Sincerely,



Kenneth Mosley
Property Owner

Merryman Construction Company

LICENSED CONTRACTOR — TEXAS, NEW MEXICO LIC. # 12007

JAL PHONES: 505 395-3110 OR 395-2616

P.O. DRAWER U HIGHWAY 18

JAL, NEW MEXICO 88252

March 15, 1996

Mr. William J. LeMay
State of New Mexico
Energy, Minerals and Natural
Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: (UIC-CL1-006) P. & S. Brine Sales

Dear Mr. LeMay:

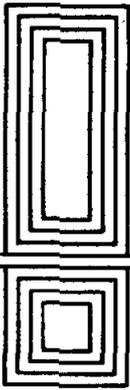
I respectfully request referenced permit application be denied. As a longtime resident, business man, and property owner in Jal, New Mexico I am quite concerned that the disposal of waste into a salt cavern would have a negative impact on all property in Jal as well as South Lea County. If the salt cavern developed a perforation or in fact collapsed, the waste contained in the salt cavern would possibly relocate into the underground water reservoirs thus causing great damage to the environment and could cause health and safety hazards to area workers and residents.

If this permit application is not denied and a public hearing is conducted by the Oil Conservation Commission, I wish to be notified the date, time, and location of the hearing. I request my name be recorded in your records as a protestant. I will present testimony if a public hearing is the decision by the Oil Conservation Commission.

Sincerely,

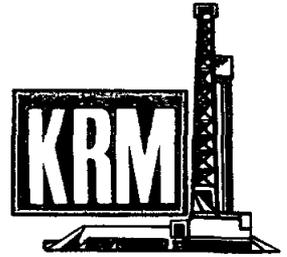

Jake Merryman
Owner

OIL CONSERVATION DIVISION
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K R M
P. O. BOX 1832
HOBBS, NEW MEXICO 88241

393-8048



393-2345

March 15, 1996

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FEB 18 1996
Environmental Bureau
Oil Conservation Division

Mr. Mark Ashley
State of New Mexico
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico

Re: P & S Brine Sales
Permian Brine Sales

Dear Mr. Ashley:

Enclosed please find additional information for your review concerning the above applications.

Thank you for your consideration.

Sincerely,


Ken Marsh

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-226) - Permian Brine Sales, A. L. Hickerson, 6067 W Tenth, Odessa, Texas 79763, has submitted a discharge plan application for disposal of non-hazardous semi-solid oil field waste in abandoned salt caverns located in the SE/4 SE/4 of Section 34, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 5,000 barrels per day of solid waste slurry will be injected down the tubing of the abandoned Climax Chemical Company Foster No. 1 to the bottom of the salt cavern, approximately 2,500 feet, and brine will be produced up the annulus for sale. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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 the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, 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 to him 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.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 22nd day of September, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

W. J. Lemay
Deputy Director

WILLIAM J. LEMAY, Director

SEAL

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

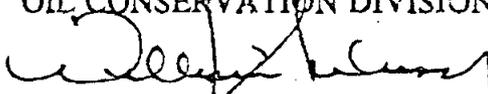
Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505. Telephone (505) 827-7131:

(UIC-CLI-005) - P. & S. Brine Sales, Paul Prather, P.O. Box 1768, Eunice, New Mexico, 88231 has submitted a discharge plan application for disposal of non-hazardous oil field waste in salt caverns located in Section 16, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. Currently, under discharge plan BW-007, fresh water is injected through the casing of the Arnott Ramsey State No.4 into the Salado Formation at an approximate depth of 1,260 feet and brine is extracted through the tubing. The average total dissolved solids concentration of the brine is approximately 290,000 mg/l. The discharge plan application proposes to reenter the previously plugged Arnott Ramsey State No. 5 brine well to allow for the injection of approximately 2,500 barrels per day of non-hazardous oil field waste slurry. Injection will be through the tubing into the existing salt cavern to approximately 1,582 feet. The Arnott Ramsey State No. 4 will be used for brine returns through the tubing. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 400 feet with a total dissolved solids concentration of approximately 1,025 mg/l. Pockets of ground water may exist in the area at depths as shallow as 50 feet, with higher or lower total dissolved solids concentrations. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other accidental discharges to the ground surface.

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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

S E A L

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

March 15, 1996

TO: MR. BILL LEMAY Fax: 505-827-8177
Director
New Mexico Oil Conservation Commission
Santa Fe, New Mexico

FROM: Gail Power
Controlled Recovery, Inc.

Number of pages: 4 including cover sheet

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

March 15, 1996

MR. WILLIAM J. LEMAY
State of New Mexico
Energy, Minerals and Natural

MR. WILLIAM J. LEMAY
State of New Mexico
Energy, Minerals and Natural
Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: (GW-226) Permian Brine Sales
(UIC-CL1-006) P & S Brine Sales

Dear Mr. LeMay:

On behalf of Controlled Recovery, Inc. I respectfully request the referenced permit applications be denied.

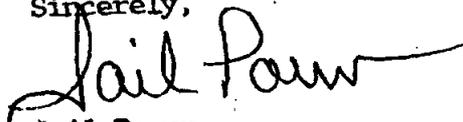
As a Lea County business owner and taxpayer, Controlled Recovery, Inc. is extremely concerned about the possibility of waste disposal into a salt cavern. I believe this disposal method would have a negative impact on surrounding property owners in Lea County, New Mexico. The salt cavern(s) could develop leaks and possibly collapse allowing migration of waste into the precious and irreplaceable water aquifer. Any damage to the underground water supply would most likely cause health and safety risks for all persons in this region of New Mexico.

If my request to deny these applications is not implemented, I respectfully request a public hearing to review these applications be conducted by the Oil Conservation Commission. Please enter Controlled Recovery, Inc. (Gail Power) as a registered protestant in these cases.

If a hearing is held, I intend to present testimony and supporting documentation to express my opposition to both of these permit applications.

Please advise time and place of hearing if applicable.

Sincerely,


Gail Power

CP/4h

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-226) - Permian Brine Sales, A. L. Hickerson, 6067 W Tenth, Odessa, Texas 79763, has submitted a discharge plan application for disposal of non-hazardous semi-solid oil field waste in abandoned salt caverns located in the SE/4 SE/4 of Section 34, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 5,000 barrels per day of solid waste slurry will be injected down the tubing of the abandoned Climax Chemical Company Foster No. 1 to the bottom of the salt cavern, approximately 2,500 feet, and brine will be produced up the annulus for sale. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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 the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which

The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, 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 to him and a 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.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 22nd day of September, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

William J. Jemay
Deputy Director

WILLIAM J. JEMAY
FAX NO. 5058216177

SEAL

MAR-11-96 MON 11:03 AM OIL CONSERVATION DIV

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505. Telephone (505) 827-7131:

(UIC-CL1-005) - P. & S. Brine Sales, Paul Prather, P.O. Box 1768, Eunice, New Mexico, 88231, has submitted a discharge plan application for disposal of non-hazardous oil field waste in salt caverns located in Section 16, Township 25 South, Range 37 East, N30E14, Lea County, New Mexico. Currently, under discharge plan BW-007, fresh water is injected through the casing of the Arnott Ramsey State No. 4 into the Salado Formation at an approximate depth of 1,260 feet and brine is extracted through the tubing. The average total dissolved solids concentration of the brine is approximately 290,000 mg/l. The discharge plan application proposes to reenter the previously plugged Arnott Ramsey State No. 5 brine well to allow for the injection of approximately 2,500 barrels per day of non-hazardous oil field waste slurry. Injection will be through the tubing into the existing salt cavern to approximately 1,582 feet. The Arnott Ramsey State No. 4 will be used for brine returns through the tubing. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 400 feet with a total dissolved solids concentration of approximately 1,025 mg/l. Pockets of ground water may exist in the area at depths as shallow as 50 feet, with higher or lower total dissolved solids concentrations. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other accidental discharges to the ground surface.

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 the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, 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 to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 1996.

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505. Telephone (505) 827-7131:

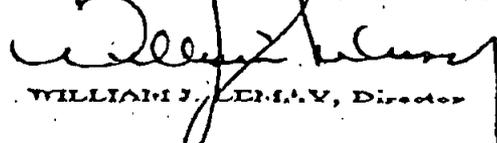
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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

SEAL

The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO OIL CONSERVATION
ATTN: SALLY MARTINEZ
P.O. BOX 6429
SANTA FE, N.M. 87502-6429

AD NUMBER: 472430

ACCOUNT: 56689

LEGAL NO: 59162

P.O. #96199002997

204 LINES once at \$ 81.60

Affidavits: 5.25

Tax: 5.43

Total: \$ 92.28

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
Energy, Minerals and
Natural Resources
Department
Oil Conservation Division

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GIVEN under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

Legal #59162
Pub. February 27, 1996

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 59162 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 27th day of FEBRUARY 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 27th day of FEBRUARY A.D., 1996



OFFICIAL SEAL
Candace C. Ruiz
NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 9/29/99

Candace C. Ruiz

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath, deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico, and said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

RECEIVED
MAR 15 1996
Oil Conservation Division

That the notice which is hereto attached, entitled
Notice Of Publication

~~XXXXXXXXXXXX~~ ~~XXXXXX~~
..... ~~XXXXXXXXXXXX~~
~~XXXXXXXXXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXXXXXXXXXX~~ same day ~~XXXXXXXXXXXX~~, for one (1) day

~~XXXXXXXXXXXX~~, beginning with the issue of
February 27 19 96
and ending with the issue of
February 27 19 96

And that the cost of publishing said notice is the sum of \$ 53.60

which sum has been (Paid) (~~XXXXXXXX~~) as Court Costs

Joyce Clemens
Subscribed and sworn to before me this 8th
day of March 19 96

Jan Sevier
Notary Public, Lea County, New Mexico
My Commission Expires Sept. 28 19 98

LEGAL NOTICE
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505, Telephone (505)827-7131:

(UIC-CL1-006) - P. & S. Brine Sales, Paul Prather, P.O. Box 1768, Eunice, New Mexico, 88231 has submitted a discharge plan application for disposal of non-hazardous oil field waste in salt caverns located in Section 16, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. Currently, under discharge plan BW-007, fresh water is injected through the casing of the Arnott Ramsey State No. 4 into the Salado Formation at an approximate depth of 1,260 feet and brine is extracted through the tubing. The average total dissolved solids concentration of the brine is approximately 290,000 mg/l. The discharge plan application proposes to re-enter the previously plugged Arnott Ramsey State No. 5 brine well to allow for the injection of approximately 2,500 barrels per day of nonhazardous oil field waste slurry. Injection will be through the tubing into the existing salt cavern to approximately 1,582 feet. The Arnott Ramsey State No. 4 will be used for brine returns through the tubing. Ground water most likely to be affected by any accidental discharge is at a depth of approximately 400 feet with a total dissolved solids concentration of approximately 1,025 mg/l. Pockets of ground water may exist in the area at depths as shallow as 50 feet, with higher or lower total dissolved solids concentrations. The discharge plan addresses construction, operation and monitoring of the well and associated surface facilities and provides a contingency plan in the event of accidental spills, leaks and other accidental discharges to the ground surface.

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Given under the Seal of the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 21st day of February, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
William J. LaMay, Director

SEAL
Published in the Lovington Daily Leader February 27, 1996.

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

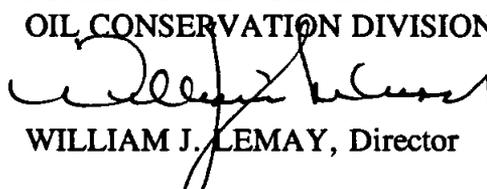
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

SEAL



February 22, 1996

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. **Publisher's affidavit in duplicate.**
2. **Statement of cost (also in duplicate.)**
3. **CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than February 29, 1996.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

PS Form **3800**, March 1993

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Z 765 963 202

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
 P.O. Box 1948 87504-1948
 827-5830
Park and Recreation Division
 P.O. Box 1147 87504-1147
 827-7465

827-5850
Administrative Services
 827-5925
Energy Conservation & Management
 827-5800
Mining and Minerals
 827-5970
Oil Conservation
 827-7131

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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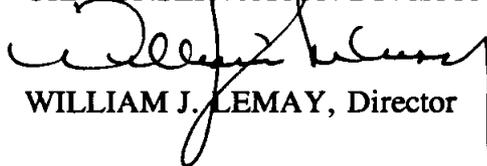
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of February 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

February 22, 1996

NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997

ATTN: BETSY PERNER

Dear Sir/Madam:

Please publish the attached notice one time. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit.
2. Invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on Tuesday, February 27, 1996

Sincerely,


Sally E. Martinez
Administrative Secretary

Attachment

EDDIE SEAY CONSULTING

ENVIRONMENTAL,
GEOLOGICAL & REGULATORY
SPECIALISTS

PEAK
CONSULTING SERVICES



601 W. ILLINOIS
HOBBS, NEW MEXICO 88240
(505) 392-2236
FAX (505) 392-6949

RECEIVED

FEB 07 1996

Environmental Bureau
Oil Conservation Division

February 5, 1996

Mr. Mark Ashley
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: Request for permit to dispose in brine cavity at P & S
Brine BW7 facility.

Dear Sir:

Permission is being requested for a permit to dispose of non-hazardous semi-solid oilfield waste into brine cavity and also produce brine.

The facility has already been approved by OCD for a brine discharge facility under BW7.

Enclosed is information pertaining to the disposal request.

Your consideration to this request will be greatly appreciated.

Sincerely,

Eddie W. Seay
Eddie W. Seay, Agent

P & S BRINE SALES BW7 located 3 miles East of Jal, NM in Lea Co.

All pertinent data for the brine extraction application is on file at OCD. We only wish to add our disposal process and are unsure of what additional information may be necessary.

The facility is located in Section 16, Township 25 S., Range 37 E., Lea Co., NM.

A map of the mixing and blending facility was recently sent to you.

1. Source of material would be drilling mud, tank bottoms, workover fluids and other oil and gas wastes that contain solids.
2. Estimated volume would be approximately 2500 bls per day.
3. Steel mixing tanks, to mix waste material with brine water to make a slurry.
4. The brine will come from recirculating after solid waste is disposed.
5. A transfer pump will be used to plum solids and circulate brine.
6. All piping will be API standard.
7. Area will be maintained and monitored.
8. All slurry tanks and unloading area will be mounted on concrete.

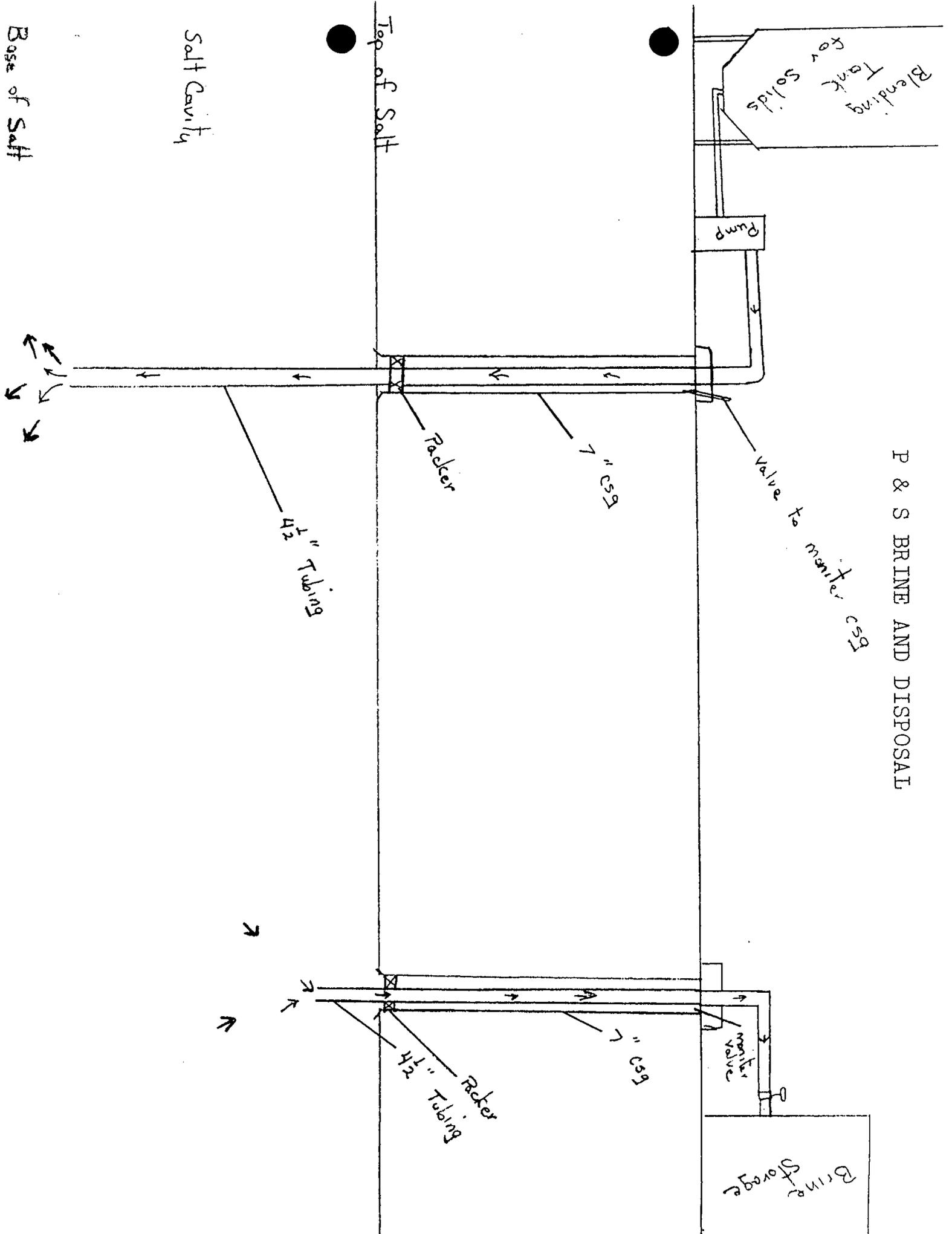
P & S wishes to use 2 wells for its disposal brine operation. One well will be used to dispose of solid waste, down tubing with a packer, while brine is produced out the tubing on the second well. With this set up pressure integrity tests could be run at any time and leaks could be monitored. (Note diagram of wells)

The two wells are equipped with 7" casing, circulated with cement to surface. Casing is set at approximately 1200 ft., which is the top of the salt section. The base of the salt section is approximately 2100 ft. This is a new process for New Mexico, but is being used in Texas in several locations.

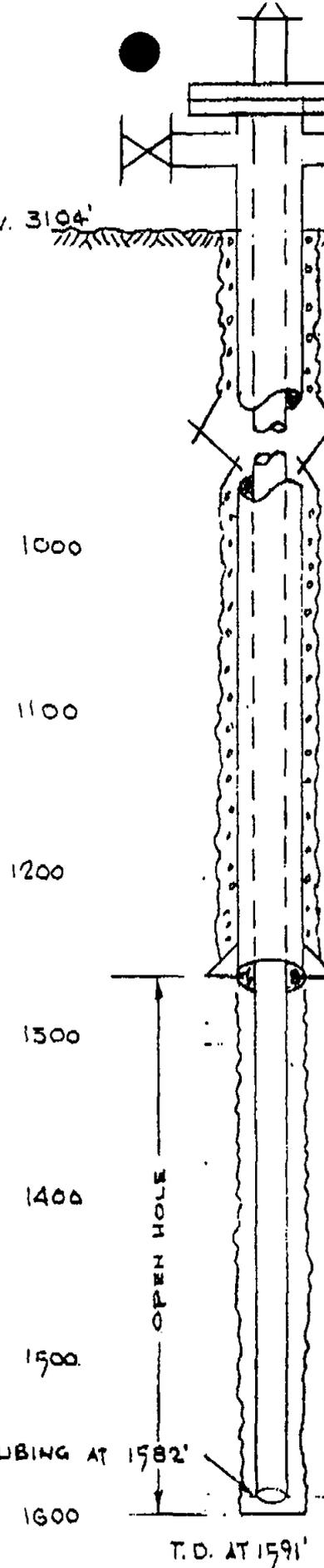
If you need additional information or have questions, please call or write to me.

Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88240
(505)392-2236

P & S BRINE AND DISPOSAL



SURFACE ELEV. 3104'



CASING CEMENTED TO SURFACE

5 1/2" CASING SET AT 1258'

OPEN HOLE

2 7/8" TUBING AT 1582'

T. D. AT 1591'

JAL BRINE STATION	
DOWN-HOLE SKETCH OF BRINE WELL	
BY: R. C. McCUTCHAN TEX. P. E. 9844	DRAWING NO.: 2

P & S BRINE SALES
P. O. Drawer 1769
Eunice, New Mexico 88231
(505) 394-2545

November 11, 1993

State of New Mexico
Commissioners of Public Lands
P. O. Box 1148
Santa Fe, NM 87504-1148

Re: Salt Lease No. M-14474

Dear Mr. Prando:

As you know from talking with Mr. Anderson, we had to plug our salt water well because of bad casing.

We have contacted three small drilling companies as to the availability for a rig. They all are drilling now but stated they would contact us as soon as possible about starting our new well.

If we can be of any other service, please advise this office. We do not want to forfeit this salt water lease.

Thank you for your time and attention in this matter.

Sincerely,



Paul Prather
P & S Brine Sales
Box 1769
Eunice, NM 88231

*Give them
60 days to
start drilling
20*

Submit 3 Copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-103
Revised 1-1-89

DISTRICT I
P.O. Box 1980, Hobbs, NM 88240

OIL CONSERVATION DIVISION
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

DISTRICT II
P.O. Drawer DD, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

WELL API NO.
5. Indicate Type of Lease STATE <input checked="" type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No. M-14474
7. Lease Name or Unit Agreement Name ARNOTT RAMSEY
8. Well No. #4
9. Pool name or Wildcat NONE

SUNDRY NOTICES AND REPORTS ON WELLS
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR TO PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: OIL WELL <input type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER BRINE WELL
2. Name of Operator P & S BRINE SALES
3. Address of Operator P. O. BOX 1769 EUNICE, NM 88231

4. Well Location Unit Letter <u>P</u> : <u>515</u> Feet From The <u>SOUTH</u> Line and <u>100</u> Feet From The <u>EAST</u> Line Section <u>16</u> Township <u>25S</u> Range <u>37E</u> NMPM LEA County
10. Elevation (Show whether DF, RKB, RT, GR, etc.) 3150

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	PLUG AND ABANDONMENT <input checked="" type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>		CASING TEST AND CEMENT JOB <input type="checkbox"/>	
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work) SEE RULE 1103.

RIGGED UP DA&S PLUGGING UNIT
PULL WELL HEAD OFF
PULLED TUBING & SET PLUG @ 1100'
CIRCULATED CEMENT DOWN TUBING TO SURFACE
PULLED TUBING LAYED DOWN
WELDED CAP ON CASING & PUT UP DRY HOLE MARKER

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Paul Prather TITLE PARTNER DATE 10-18-93

TYPE OR PRINT NAME PAUL PRATHER TELEPHONE NO. 394-2545

(This space for State Use)

APPROVED BY _____ TITLE _____ DATE _____

CONDITIONS OF APPROVAL, IF ANY:

X200064

P & S BRINE SALES
P. O. Drawer 1769
Eunice, New Mexico 88231
(505) 394-2545

January 4, 1994

State of New Mexico
Commissioner of Public Lands
310 Old Santa Fe Trail
P. O. Box 1148
Santa Fe, NM 87504-1148

Attn; Floyd O. Prando

Re: State of New Mexico Lease M-14474

Dear Mr. Prando:

The new #5 brine well to be drilled on the above referenced lease was completed as of January 3, 1994. Presently we are putting brine water in the pit and should start sales next week.

Thank you for your time and attention in this matter.

Sincerely



Paul Prather
Owner