



Form 3160-18
(November 2019)UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

NOTICE OF WRITTEN ORDER

Number 21MBH0016W

Page 1 of 3

<input checked="" type="checkbox"/> Certified Mail-Return Receipt Requested 70190700000127797424	Identification	
<input type="checkbox"/> Hand Delivered, Received By and Date	Lease	NMLC068282B
	Agreement	

Bureau of Land Management Office Carlsbad Field Office		Operator or Third Party HANSON OPERATING COMPANY INCORPORATED
Address 620 E. Greene St. Carlsbad, NM 88220		Address
Telephone 5752345951	Inspector MELISSA HORN	Attention
Site Name HANSON	Well/Facility/FMP/Identification# 5	Legal Land Description (Include Lat./Long.) SESW, 25-26S-31E
Site Name	Well/Facility/FMP/Identification#	Legal Land Description (Include Lat./Long.)
Site Name	Well/Facility/FMP/Identification#	Legal Land Description (Include Lat./Long.)

THE FOLLOWING ISSUE(S) WERE FOUND BY BUREAU OF LAND MANAGEMENT INSPECTORS ON THE DATE AND AT THE SITE(S) LISTED.

Date	Time (24-hour Clock)	Corrective Action to be Completed By	Date Corrected	Authority Reference
01/01/2021	13:00	05/12/2021		43 CFR 3162.5-1 (a)

Remarks:

Field inspection was conducted on 1/05/2021 to monitor the progress of the reclamation at the referenced location. Inspection found the following environmental concerns which are required to be addressed in order to meet BLM reclamation objectives.

- Reclaimed pad sits on the edge of active pad location and along access road for ROW. The reclaimed portion of the pad not utilized for road requires additional work. These areas must be ripped as needed and seeded accordingly. Adequate berms must be installed to deter vehicle traffic from entering the location. A lack of berms has resulted in vehicle traffic on pad (as evidenced by the tire tracks present).

The above issues must be remedied prior to the specified abatement date in order to avoid further enforcement action. Return signed I&E Copy to the office via mail or email once completed. Feel free to contact me with any questions, concerns, onsite requests, or if you are unable to address these issues at this time.

Attn: Melissa Horn, Environmental Protection Specialist
620 E Greene Street
Carlsbad, NM 88220
Phone: (575) 988-5122

When the Written Order is complied with, sign this notice and return to above address.

Company Representative Signature: _____ Print Name: _____ Date: _____

Company Comments:

In accordance with 43 CFR 3163.1(a), you must comply with the corrective actions for the identified issue(s) by the abatement date provided above. If you fail to comply within the time frames specified, you will be issued an Incident of Noncompliance (INC) in accordance with 43 CFR 3163.1(a), which may include an assessment or additional enforcement actions as deemed necessary to gain compliance.

WARNING

The Authorized Officer has authority to issue a Written Order in accordance with 43 CFR 3161.2. Per 43 CFR 3165.3, Written Order and reporting time frames begin upon receipt of the Notice, or seven business days after the date it is mailed, whichever is earlier. Each issue must be corrected by the "Action to be Completed By" date identified above. This form must be signed, dated, and postmarked no later than the next business day after the prescribed timeframe for correction and returned to the Bureau of Land Management office at the address shown above.

Section 109(d)(1) of the Federal Oil and Gas Royalty Management Act of 1982, as implemented by the applicable provisions of the operating regulations at 43 CFR 3163.2(f)(1), provides that any person who "knowingly or willfully" prepares, maintains, or submits false, inaccurate, or misleading reports, notices, affidavits, records, data, or other written information required by this part shall be liable for a civil penalty per violation for each day such violation continues.

REVIEW AND APPEAL RIGHTS

A person contesting an Order of the Authorized Officer or violation must request a State Director Review of the Written Order or Incident of Noncompliance. This request must be filed within 20 business days of receipt of the Written Order with the appropriate State Director (see 43 CFR 3165.3). The State Director review decision may be appealed to the Interior Board of Land Appeals, 801 North Quincy Street, MS 300-QC, Arlington, Virginia 22203 (see 43 CFR 3165.4). Contact the above listed Bureau of Land Management office for further information.

Signature of Bureau of Land Management Authorized Officer

Date

Time (24-hour Clock)

8/1/21

1500

(Form 3160-18, Page 2)

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Attn: Melissa Horn, Environmental Protection Specialist
620 E Greene Street
Carlsbad, NM 88220
Phone: (575) 988-5122
Email: mhorn@blm.gov

Carol Smith

From: John Maxey
Sent: Thursday, April 22, 2021 11:40 AM
To: Horn, Melissa B
Cc: Carol Smith; Shari Hamilton; John Maxey
Subject: RE: [EXTERNAL] Hanson 5 - BLM Notice of Written Order 21MBH0016W

Melissa,

When our guy went back down there at a later point in time to check out our previous work, at that time he said people were driving around everywhere, and over our berms, with some being knocked down by someone's earth moving equipment. The area is very active right now with Conoco drilling wells and pipelines being constructed. We had even left a portion of some of our lease road without berms at the ranchers request so he could easily get to his tank on the west side of our lease, which alleviated two track road travel. Between ranching and oil and gas activity, we're going to defer. I don't want a repeat of what happened to the #5.

John C. Maxey P.E.
Hanson Operating Co Inc
P. O. Box 1515
Roswell, NM 88202-1515
Off: 575-622-7330 X25

From: Horn, Melissa B <mhorn@blm.gov>
Sent: Tuesday, April 20, 2021 12:39 PM
To: John Maxey <jcm@hansonop.com>
Cc: Carol Smith <carol@hansonop.com>; Shari Hamilton <shari@hansonop.com>
Subject: Re: [EXTERNAL] Hanson 5 - BLM Notice of Written Order 21MBH0016W

Hi John,

I understand your concerns regarding this location.

The inspection noted that vegetation was sparse and the location was lacking a berm, tire tracks were present, etc. Your aerial image-shows striations and some vegetation regrowth, however ripping and seeding does not itself ensure successful vegetation regrowth. Oftentimes years down the line, evidence of residual surface contamination becomes apparent when portions of reclaimed pad remain barren. That being said, active drilling and construction can certainly wreak havoc on reclamations. Not only in the way of contaminants, but excessive dust stirred up which can cover existing vegetation- adversely impacting and decreasing the likelihood of new growth.

Various Hanson locations were inspected on this day- some of which were deemed suitable for Final Abandonment (I will get a list of these locations to you) and therefore a FAN sundry can be submitted and you can wash your hands of them... There were also a few which were placed back into monitoring status because certain reclamation work (i.e. access roads) could not be completed due to ROW interference. Understanding this issue, those reclamations were not written up and will be addressed once the pipelines have been removed. Hanson Fed 6 was an exception because the ROW was not deemed to interfere in the reclamation of the majority of the access road leading to this location. If you wish to defer this work until the removal of the ROW you may request to do so, but this portion of the road will remain Hanson's responsibility. Let me know how you would prefer to proceed with this one.

I will close this NOV for the Hanson 5 to allow time for myself and the Realty Specialists to reach out to the nearby operators and ROW companies in this area. This is not to say that you will not be expected to play in a role in this reclamation in the future. A determining factor will be concluding the cause of the barren areas on the location and whether they were indeed caused by nearby operations, or rather residual contamination from the Hanson operations.

Thanks again for reaching out.

Melissa

From: John Maxey <jcm@hansonop.com>

Sent: Tuesday, April 20, 2021 11:45 AM

To: Horn, Melissa B <mhorn@blm.gov>

Cc: Carol Smith <carol@hansonop.com>; Shari Hamilton <shari@hansonop.com>; John Maxey <jcm@hansonop.com>

Subject: [EXTERNAL] Hanson 5 - BLM Notice of Written Order 21MBH0016W

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Melisa,

The subject well was P&A by Hanson Operating in May of 2009, and the location was ripped and seeded with berms built to dissuade travel onto the old pad. If you will look at the attached aerial taken shortly after P&A, and you will notice the north-south striations which are a result of the ripping. You will also note that there was no other construction near our site.

Now look at the recent aerial below the old one. You will notice that the remediation that we performed has been completely destroyed by either the operator who drilled the adjacent well in 2011, the current operator that took over operations in 2012, or possibly a pipeline contractor associated with what appears to be new ROW. I noted in the OCD file on for the first operator that when they spud the original adjacent well, they had mechanical trouble and had to plug the surface hole, skid the rig 107' to the west closer to our old location, and spud a new well. The pad extension to the west which encroached on our location was approved by Jim Amos w/ the BLM on 11/17/11. This caused additional disturbance, as there has been a lot of construction in the area after we completed our remediation. Basically we remediated the location approximately 10 years ago, and through actions by one of the aforementioned operators our work was basically obliterated. For this reason I have not executed the subject order, and we will not be remediating a second time due to actions of others outside our control.

If you have any questions, you can reach me at the number below.

John C. Maxey P.E.
Hanson Operating Co Inc
P. O. Box 1515
Roswell, NM 88202-1515
Off: 575-622-7330 X25

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

COMMENTS

Action 31037

COMMENTS

Operator: HANSON OPERATING CO INC P.O. Box 1515 Roswell, NM 88202	OGRID: 9974
	Action Number: 31037
	Action Type: [C-103] Sub. For Delivery (C-103V)

COMMENTS

Created By	Comment	Comment Date
jagarcia	Accepted for record	10/19/2021

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
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Operator: HANSON OPERATING CO INC P.O. Box 1515 Roswell, NM 88202	OGRID: 9974
	Action Number: 31037
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CONDITIONS

Created By	Condition	Condition Date
jagarcia	None	10/19/2021