



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 23, 1997

BPF, Incorporated
205 East Central Street
Duncanville, Texas 75116

Attention: Mr. Donald W. Capone, II

Re: Pilot Scale NORM Injection Demonstration

Dear Mr. Capone:

Reference is made to your letter dated May 13, 1997 for authorization to proceed with the DOE funded pilot scale demonstration of BPF Incorporated's NORM treatment and disposal process. It is our understanding that Conoco's SEMU SWD Well No. 95 and King SWD Well No. 1 will be utilized for the pilot scale demonstration.

You are hereby authorized to proceed with the pilot scale demonstration, subject to the following conditions:

- a) the SEMU SWD Well No. 95 and the King SWD Well No. 1 shall both be permitted for NORM injection as per the requirements contained within Division Order No. R-10609 (copy enclosed);
- b) the Division shall be notified of the date and time of NORM injection into the subject wells.

If I can be of further assistance, please advise.

Sincerely,

A handwritten signature in cursive script that reads "David Catanach".

David Catanach
UIC Director

xc: OCD-Artesia
OCD-Hobbs
Case File-10107
Case File-5708 ✓



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OFFICE OF THE SECRETARY
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-5950

Jennifer A. Salisbury
CABINET SECRETARY

March 8, 1996

BPF Inc.
1555 Valwood Parkway
Suite 100
Carrollton, Texas 75006

Attention: John R. Garland

Dear Mr. Garland:

Reference is made to your request dated February 16, 1996 for authorization to conduct a bench scale demonstration of Naturally Occurring Radioactive Material (NORM) injection technology within two Class II disposal wells located in Eddy and Lea Counties, New Mexico. It is our understanding that this DOE funded project is designed to test a technology whereby NORM waste is thermally and chemically treated so as to render it suitable for injection. It is further our understanding that Phase I of this project involves the injection of less than one barrel of treated NORM waste into the following described Class II disposal wells operated by Conoco Inc.:

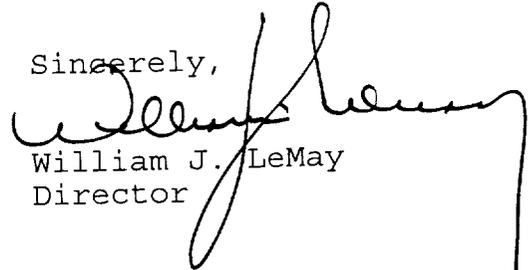
<u>WELL NAME</u>	<u>WELL LOCATION</u>	<u>PERMIT NUMBER</u>
SEMU SWD No. 95	Unit J, Section 23, T-20S, R-37E Lea County, New Mexico	R-9327
King SWD No. 1	Unit C, Section 9, T-20S, R-25E Eddy County, New Mexico	R-5250

BPF Inc. is hereby authorized to conduct the bench scale test as described above. Such injection shall be limited to the volume of NORM treated waste detailed in your request. In addition, inasmuch as your proposed operation is considered by the Division to be a technology demonstration, amendment of R-9327 and R-5250, including notification to offset operators, will not be required. Injection of larger volumes of NORM shall be subject to Division Rules and Regulations which will be promulgated shortly.

Please provide 24 hour notice to the Artesia and Hobbs district offices of the Division prior to conducting the bench scale test in order that such operations may be witnessed.

If you should have any questions, please contact Mr. David Catanach at (505) 827-8184.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay". The signature is written in a cursive style and is positioned above the typed name and title.

William J. LeMay
Director

xc: OCD-Hobbs, Attn: Jerry Sexton
 OCD-Artesia, Attn: Tim Gum
 Case Files-10107, 5708
 D. Catanach



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 11, 1997

BPF Inc.
205 East Center Street
Duncanville, Texas 75116

Attention: Mr. John G. Bush

Re: Pilot Scale NORM Injection

Dear Mr. Bush:

Reference is made to your letter dated October 7, 1997, for authorization to conduct a pilot scale demonstration of Naturally Occurring Radioactive Material (NORM) injection within two Class II disposal wells located in Lea and Eddy Counties, New Mexico. It is our understanding that this DOE funded project is designed to test a technology where NORM waste is thermally and chemically treated so as to render it suitable for injection. It is further our understanding that this phase of the project involves the injection of approximately 20 barrels of treated waste at the Lea County site and 400 barrels of treated waste at the Eddy County site. The subject Class II disposal wells are described as follows:

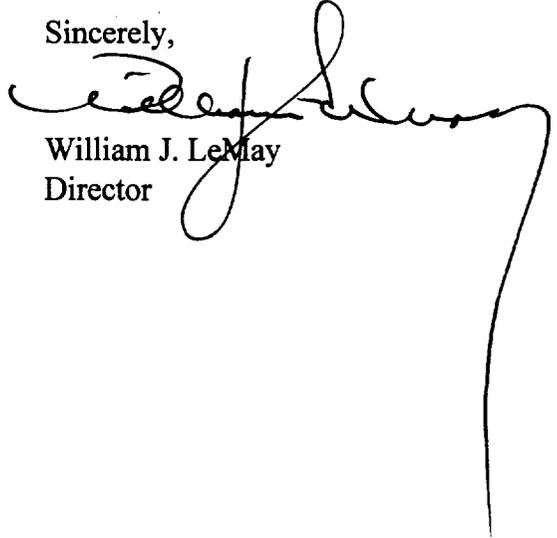
<u>OPERATOR</u>	<u>WELL NAME</u>	<u>WELL LOCATION</u>	<u>PERMIT NO.</u>
Conoco Inc.	SEMU SWD No. 95	J-23-20S-37E Lea County, N.M.	R-9327
Yates Petroleum Corporation	King SWD No. 1	C-9-20S-25E Eddy County, N.M.	R-5250

BPF Inc. is hereby authorized to conduct the pilot scale demonstration as described above. Due to the volumes associated with your proposed demonstration, either BPF Inc. or the operators of the subject wells will be required to furnish notice of the proposed injection to all operators within one-half mile of the disposal wells. Such notice shall contain detailed information regarding volumes, procedures, the type of fluid being injected, and the dates and times such injection will take place. The notice should also provide that any offset operator shall have the opportunity to object to such injection within 15 days of receipt of notice. Any objection should be entered with the Division.

Please provide the Division a copy of the notice letter and a list of operators who were notified of such injection. If no objections are entered with the Division within the time frame allowed, BPF Inc. will be authorized to carry out its proposed demonstration.

Please provide 24 hour notice to the Artesia and Hobbs District Offices of the Division prior to conducting the pilot scale demonstration in order that such operations may be witnessed.

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. Lemay', with a long vertical line extending downwards from the end of the signature.

William J. Lemay
Director

xc: OCD-Hobbs
 OCD-Artesia
 Case File-10107 /
 Case File-5708 /
 D. Catanach