



STATE OF NEW MEXICO

ENERGY, MINERALS and NATURAL RESOURCES DIVISION  
OIL CONSERVATION DIVISION  
AZTEC DISTRICT OFFICE



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

1000 RIO BRAZOS ROAD  
AZTEC, NEW MEXICO 87410  
(505) 334-6178

December 13, 1993

Anu N. Pundari  
Sr. Compliance Engineer  
El Paso Natural Gas Company  
PO Box 4990  
Farmington, NM 87499

RE: Illegal Pits in Northwest New Mexico  
Cutler #2, A-14-24N-06W (Drip Pit)

Dear Ms. Pundari:

Field inspections conducted on December 10, 1993 by Charles Gholson revealed that the above mentioned pit has been netted as per requested and no longer requires a C-134.

If you have any questions please feel free to call me at 505-334-6178.

Yours truly,

*Dianna K. Fairhurst*

Dianna K. Fairhurst  
Deputy Oil & Gas Inspector

xc: Jackie Neckels - BLM Farmington  
C-134 Correspondence  
Well File

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88241-1980

**OIL CONSERVATION DIVISION**  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88211-0719

Permit No. \_\_\_\_\_  
(For Division Use Only)

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

**APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952**  
**FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(I)**

Operator Name: El Paso Natural Gas Company

Operator Address: P.O. Box 1492, El Paso, Texas 79978

Lease or Facility Name Cutler #2 (Drip) Location A 14 35 6  
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: 9x9

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

X The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Under normal operating conditions this pit would not contain oil and thus would not constitute a water fowl hazard. Furthermore, the size of the pit and fencing is a deterrent to waterfowl landing in the pit.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

In 72 hours from discovery oil should be removed. Operators discharging to El Paso's pit have also been advised of compliance requirements.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: \_\_\_\_\_

RECEIVED

SEP 28 1989

OIL CON. DIV.

DIST. 3

**CERTIFICATION BY OPERATOR:** I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Kenneth E. Beasley Title Mgr., Compliance Engr. Date 9-12-89

Printed Name Kenneth E. Beasley, IV Telephone No. 915) 541-2146

**FOR OIL CONSERVATION DIVISION USE**

Date Facility Inspected 10/13/92

Inspected by Diana K. Fairhurst

12/13/93 CG - PIT IS NOW NETTED

Approved by \_\_\_\_\_

Title Diana K. Fairhurst

Date \_\_\_\_\_

DEC 13 1993  
DEPUTY OIL & GAS INSPECTOR

NOT APPROVED -

H<sub>2</sub>O WITH HEAVY SKIM OIL, NO NET

8/17/93 - INSP. BY JACKIE NECKELS/BLM

CONTAINING H<sub>2</sub>O AND HYDROCARBONS - NO NET