

3R - 417

P&A Report

1/20/2010



Enterprise Products™

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January 20, 2010

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

Return Receipt Requested
7009 1680 0001 0284 2949

Mr. Jim Griswold
Environmental Bureau Chief
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Plugging and Abandonment Report
Enterprise Field Services, LLC
CPS-1989 Cathodic Protection Well
OCD Case# 3R-417**

Dear Mr. Griswold:

This correspondence documents the plugging and abandonment of Enterprise Field Services, LLC (Enterprise) cathodic protection station CPS-1989. The cathodic protection well at this location was removed from service following the discovery that well head controls had been damaged due to corrosion on March 6, 2008. After it was determined that the source of the corrosion was a discharge of low pH (~2.0) groundwater, the New Mexico Oil Conservation Division (OCD) was notified on March 13, 2008.

Enterprise implemented controls to prevent site access and to collect the water discharge prior to neutralization and offsite disposal. Attempts to determine the potential source of the low pH water discharge were inconclusive. Enterprise requested that the OCD approve plugging and abandonment of the well.

A Notice of Intention to Plug and Abandon CPS-1989 was filed with the OCD on July 22, 2009. OCD approval was contingent on removal of the coke breeze and anodes from the well prior to P&A. The operation was initiated on November 3, 2009, and on November 20, 2009, the OCD was notified that drilling efforts had ceased due to the increasing loss of borehole integrity and inability to remove the anode beds. The OCD provided their approval to cease drilling operations at this time, and to begin plugging operations at the depth of 235 ft. The OCD approved the plugging and abandonment of the well at this depth, and required a groundwater investigation to determine if groundwater near the well location was impacted.

Enterprise is moving forward with an approved work plan to investigate groundwater conditions near the former well location, since not all the coke breeze could be removed during the abandonment of the well.

Mr. Jim Griswold
Re: Enterprise CPS-1989
January 20, 2010

Attached please find the following documentation of the CPS-1989 plugging and abandonment operation; C-103 subsequent sundry notice, C-144 CLEZ pit closure and the final report of P&A operations with supporting documentation.

Please do not hesitate to contact me at (713) 381-2286, or drsmith@eprod.com if you have any questions.

Sincerely,



David R. Smith, P.G.
Sr. Environmental Scientist

/bjm
Enclosure

cc: Glenn Von Gonten, NMOCD/Santa Fe, NM
Charlie Perrin, NMOCD/Aztec, NM
Brandon Powell, NMOCD/Aztec, NM
Jim Lovato, BLM/Farmington, NM
Cindy Gray, Souder Miller and Associates/Farmington, NM

Submit 1 Copy To Appropriate District Office
 District I
 1625 N. French Dr., Hobbs, NM 88240
 District II
 1301 W. Grand Ave., Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 October 13, 2009

OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

WELL API NO. Nearest Producing Well: 30-045-07513
5. Indicate Type of Lease Federal X STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No. N/A
7. Lease Name or Unit Agreement Name Enterprise Cathodic Protection Station
8. Well Number 1989
9. OGRID Number N/A
10. Pool name or Wildcat N/A
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 5696' GR

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

1. Type of Well: Oil Well Gas Well Other

2. Name of Operator
Enterprise Field Services, LLC.

3. Address of Operator
1100 Louisiana Street, Houston, TX 77002-5227

4. Well Location
 Unit Letter A : 620 feet from the North line and 60 feet from the East line
 Section 13 Township 28N Range 10W NMPM County San Juan, NM

12. 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"/>	P AND A <input checked="" type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
DOWNHOLE COMMINGLE <input type="checkbox"/>			
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

10-30-09; Excavated around 8" PVC casing, Placed 9 5/8" steel casing over PVC to a depth of 10' BGL. Cemented 9 5/8" casing with 11 yd concrete, back-filled excavated area. 11-02-09; MIRU A Plus Well Services. 11-03-09 thru 11-05-09; Drilled out 20' cement, cables and 1" PVC vent pipe from inside the 8" PVC casing. Drilled bentonite, cables and 1" PVC vent pipe to 62'. Entered coke breeze ground bed fill at 62'. 11-06-09 thru 11-19-09; Circulated coke breeze out of well, fished cables with various bits, wash pipes, corkscrews and grapples. The bottom of the 8" PVC was found at 96'. Good progress made to 196'. After 196' the progress became more difficult due to deteriorating hole conditions. None of the 30 anodes were recovered (2" x5' steel anodes) An area from 196' to 206' caused a great deal of problems, anode(s) may have fallen into a washed-out section. Eventually a depth of 242' was reached. Wash pipe and fishing tools could not pass beyond the cables and anodes lying on top of the coke breeze at 242'. 2 7/8" tubing with a 2 3/8" muleshoe was forced down to 262' but no coke breeze, cable or anodes were recovered from that depth. 11-20-09; TIH with wash pipe, formation sloughing had occurred and tool could not go below 230'. Enterprise stopped fishing operations due to deteriorating hole conditions. NMOCD granted conditional approval to P&A the well. MIRU logging truck, ran GR/Elog/Cal/Neu logs from 200' to surface. Dropped 46 cu ft bentonite "Hole Plug", top of bentonite @ 168'. 11-23-09; Dropped 44 cu ft bentonite "Hole Plug", top of bentonite @ 108'. 11-24-09; Rig down and move out rig. 12-05-09; Dropped 10 cu ft bentonite "Hole Plug", top of bentonite @ 69'. 12-09-09; MIRU cement pump, pumped 20 sx Class B cement (24 cu ft.) with 1 1/2" plastic tubing from 69' to surface. 12-10-09; Top of cement found at 2.5' below GL inside 9 5/8" / 8" casing. 12-17-09; Welded P&A marker on well, installed pressure gauge on 9 5/8" casing. See attached report(s) for more details.

Spud Date: Rig Release Date:

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

SIGNATURE:  TITLE: Sr. Environmental Scientist DATE: 1/20/10
 Type or print name: David R. Smith, P.G. E-mail address: drsmith@eprod.com PHONE: (713) 381-2286
For State Use Only

APPROVED BY: _____ TITLE _____ DATE _____
 Conditions of Approval (if any): _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144 CLEZ
July 21, 2008

For closed-loop systems that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, submit to the appropriate NMOCD District Office.

Closed-Loop System Permit or Closure Plan Application

(that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

Type of action: Permit Closure

Instructions: Please submit one application (Form C-144 CLEZ) per individual closed-loop system request. For any application request other than for a closed-loop system that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, please submit a Form C-144.

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Enterprise Field Services, LLC OGRID #: N/A
Address: 1100 Louisiana Street, Houston, TX 77002-5227
Facility or well name: Enterprise Cathodic Protection Station # 1989
API Number: Nearest producing well, 30-045-07513 OCD Permit Number: N/A
U/L or Qtr/Qtr A Section 13 Township 28N Range 10W County: San Juan, NM
Center of Proposed Design: Latitude 36deg, 39', 58.61" N Longitude 107 deg, 50', 28.63" NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Closed-loop System: Subsection H of 19.15.17.11 NMAC
Operation: Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent) P&A
 Above Ground Steel Tanks or Haul-off Bins

3.
Signs: Subsection C of 19.15.17.11 NMAC
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
 Signed in compliance with 19.15.3.103 NMAC

4.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.
 Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
 Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
 Closure Plan (Please complete Box 5) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
 Previously Approved Design (attach copy of design) API Number: _____
 Previously Approved Operating and Maintenance Plan API Number: _____

5.
Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)
Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.
Disposal Facility Name: EnviroTech Disposal Facility Permit Number: NM-01-0011
Disposal Facility Name: Basin Disposal Disposal Facility Permit Number: NM-01-005
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future service and operations?
 Yes (If yes, please provide the information below) No
Required for impacted areas which will not be used for future service and operations:
 Soil Backfill and Cover Design Specifications -- based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
 Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
 Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

6.
Operator Application Certification:
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.
Name (Print): David R. Smith, P.G. Title: Sr. Environmental Scientist
Signature:  Date: 1/20/10
e-mail address: drsmith@eprod.com Telephone: (713) 381-2286

7. **OCD Approval:** Permit Application (including closure plan) Closure Plan (only)

OCD Representative Signature: _____ Approval Date: _____

Title: _____ OCD Permit Number: _____

8. **Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

Closure Completion Date: 12-10-2009

9. **Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: EnviroTech Disposal Facility Permit Number: NM-01-0011

Disposal Facility Name: Basin Disposal Disposal Facility Permit Number: NM-01-005

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

Yes (If yes, please demonstrate compliance to the items below) No (Monitor wells to be drilled adjacent to this site, Re-vegetation to be done after completion of THAT project as per BLM requirements)

Required for impacted areas which will not be used for future service and operations:

- Site Reclamation (Photo Documentation)
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique

10. **Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): David R. Smith, P.G. Title: Sr. Environmental Scientist

Signature:  Date: 1/20/10

e-mail address: drsmith@eprod.com Telephone: (713) 381-2286

Enterprise Field Services, LLC
Cathodic Protection Station CPS-1989
Plugging and Abandonment Report
(New Mexico Oil Conservation Division Case #3R-417)



September 2009 – December 2009

Submitted 1-20-10

Prepared for:
David R. Smith, P.G.
Senior Environmental Scientist
Enterprise Products Operating LLC
1100 Louisiana Street, Rm 13.037
Houston, TX 77002-5227

Prepared by:
Loren Diede
Senior Geologist
Souder, Miller and Assoc.
612 E Murray Dr.
Farmington, NM 87499

Enterprise Cathodic Protection Well CPS-1989 P&A Report

Introduction

On March 7, 2008, it was discovered that the Enterprise Field Services, LLC (Enterprise) cathodic protection station CPS-1989 was producing water under artesian conditions. The pH of the water discharge was measured to determine if it was the source of corrosion observed on the surface well controls. Due to the low pH of the discharge, the New Mexico Oil Conservation Division (OCD) was notified of the release on March 18, 2008. The OCD assigned Case # 3R-417 to the site, and requested an investigation of the source of the discharge. The last samples of the water discharge prior to plugging and abandonment of the well were obtained on September 29, 2009, and October 30, 2009. The pH of the discharged water measured at these sampling events was 3.1 and 3.3, respectively.

The well is located 620' FNL and 60' FEL, Unit A, Sec 13, T28N, R10W San Juan, NM. The nearest well is the McClanahan # 18, API number 30-045-07513.

The OCD has maintained that the coke breeze utilized in CPS-1989 is the suspected source of the low pH water discharge, and directed Enterprise to remove all coke breeze from the well prior to properly plugging and abandoning the well. From the initial OCD notification until P&A work started, the water was collected on site, neutralized and then trucked to an SWD well for proper disposal. Souder Miller and Associates (SMA) was contracted to monitor and supervise the plugging and abandonment operations. A Plus Well Service was contracted to provide the rig and crew based on their plugging experience.

Traffic Diversion

The CPS-1989 well site is within 25 feet of a heavily travelled dirt road. The traffic was to be diverted away from the well site to provide a safe area for the rig and associated equipment. On September 29, 2009, concrete barriers, orange barrels, barrier tape and detour signs were set to re-direct the traffic safely away from the well site. The rig operations began November 2, 2009.

Site Preparation

The 8" PVC surface casing needed to be reinforced with a 15.5 ft. piece of 36# 9 5/8" steel casing. The area around the well was excavated to a depth of 10 ft on October 30, 2009. A 36" diameter washer was welded to the base of the 9 5/8" casing to provide an "anchor" for the casing. The 9 5/8" casing was placed over the 8" PVC casing and the annular space sealed with "Liquid Nails". A 10 ft. piece of 48" culvert pipe was placed around the 9 5/8" casing. The

space between the 9 5/8" casing and the culvert pipe was filled with concrete. Concrete was also placed around the base of the culvert. The excavated area was then back-filled.

Drilling and Fishing Operations

The rig was moved in on November 2, 2009. The drilling operations began November 4, 2009. The 8" PVC casing contained 30 - ¼" copper cables and 1 string of 1" PVC vent pipe. The cables and 1" PVC pipe had been cemented in the 8" PVC with Portland cement. (See Attachment 6) The initial drilling was done with a 6 ¾" "Hurricane" bit on 2 7/8" tubing. Cement, cables and PVC vent pipe were drilled out for a depth of 20 ft. The drilling progress was slow due to the wire wrapping around the bit. Bentonite was encountered at 20 ft. The bentonite, cables and PVC vent pipe were drilled out from 20 ft. to 62 ft. Numerous trips were made to pull the bit out of the hole to clean the balled-up wire off the bit. The pH of the drilling fluid dropped as the low pH water in the well bore was circulated to surface. The pH of the fluid circulated to surface was shown to be between 4 and 5. The pH of the fluid in the rig pit was raised periodically with soda ash to maintain a pH of 7 to 10.

The coke breeze was reached at 62 ft. on November 5. A wash pipe was used in an attempt to clean out coke breeze and cables. As the wash pipe was rotated down into the cables and coke breeze, the cables plugged the bottom 1 ½ ft. of wash pipe, halting any further progress. A corkscrew was used in an attempt to wrap and pull cables out of the hole. The corkscrew gave better results than the wash pipe. On several trips the tool and the ball of cables would hang up coming into the base of the 8" PVC casing or into the 9 5/8" to 8 5/8" bell nipple at the surface. The tools were run on 2 7/8" tubing and the fluid was circulated to bring the coke breeze to the surface. An approach that worked well was to trip in the well "open-ended" with the tubing to circulate coke breeze out of the hole leaving the cables free in the well bore. The corkscrew was then run in the hole and rotated to pick up the cables. This sequence worked very well to a depth of 196 ft. The best cable retrieval was realized on November 10, 2009 with 15 strands of cable, each approximately 20 ft. long.

On November 11, the 2 7/8" tubing with a mule shoe cut piece of 2 3/8" tubing was run to 245 ft. Coke breeze was circulated out of the hole. An attempt was made to run the corkscrew to 245 ft. but the corkscrew would not clear 206 ft. Subsequent trips with the wash pipe and corkscrews could not get through the area from 196 ft to 206 ft. It appeared that some of the anodes (first anode was at 190 ft) were lying diagonally in the hole and that the formation at that depth was being compromised. The relatively unconsolidated formation was sloughing as subsequent trips were made with various tools in an attempt to get past that depth. Formation fines of sand and shale were circulated out as attempts were made to get past 206 ft.

November 13, a three-pronged grapple was fabricated; this tool worked well to pull more cable out of the well. While circulating fluid to clean out the well some subsidence around the well head was noted. The subsidence was due to the seepage of circulation fluid. The seepage

appeared to be coming from around the 9 5/8" casing, possibly due to a leak between the 8" PVC and the 9 5/8" casing. A meeting was scheduled for November 16, to discuss options. Several unsuccessful attempts were made to get tools past 206 ft. The hole conditions in the area of 196 ft to 206 ft seem to be worsening with a large amount of formation material apparent in the circulation returns.

On November 16, SMA, Enterprise and A Plus met to discuss the well conditions. It was decided to change to well head to a larger size allowing larger tools to be run inside the 8" PVC casing. That would eliminate the "tight spot" at the 9 5/8" to 8 5/8" bell nipple. There was concern that none of the anodes had been recovered. The consensus was that, if no anodes were recovered, the anodes would continue to hinder any further efforts. The anodes that were collecting in the bottom of the hole would divert any tools to the side of the hole, causing more instability of the hole.

November 17, the wellhead was replaced with a larger diameter well head to allow larger tools to be run into the well. A 7 1/2" wash pipe was used to clean out to 212 ft. Various tools and bits were used cleaning out to 235 ft. Cables and anodes have been pushed down as the coke breeze was circulated to surface. No anodes had been recovered. 2 7/8" tubing with a piece of mule-shoe cut 2 3/8" tubing was used to get to 260 ft. The mule-shoe cut tubing could "poke" through the cable and anodes but larger tools could not advance past 220 ft. Formation fines of sand and shale were circulated to surface each tool trip in the hole, indicating continuing deterioration of the hole conditions and worsening well bore wall stability.

Plugging Operations

After discussions with the OCD, on November 20, Enterprise ceased further drilling operations at 235 ft. due to the deteriorating hole conditions and the inability to recover further anodes, electrical cable or coke breeze. Enterprise was granted conditional approval from the OCD to plug the well at the current depth. This approval was subject to submission of a work plan to investigate the ground water near the CPS-1989 with ground water monitoring well(s).

Jet West was called to run open hole well logs. Logging tools were not able to get past 200 ft. Logs indicated areas of severe wash-out with hole size diameters of over 14" in some areas. One water sand was identified from 106 ft. to 114 ft. The bottom of the 8" PVC casing was found at 96 ft.

With tubing at 260 ft., the hole was circulated with fresh water with a pH of 10-11 to aid bentonite hydration. Resistance from a possible "wad" of cables and anodes was encountered at 235 ft. Four cubic feet (cf) of 3/8" bentonite "Hole Plug" was dropped down tubing at a depth of 260 ft. The tubing was pulled out of the hole and an additional 46 cf of bentonite "HolePlug" was dropped via casing. The well was shut in over the weekend to allow the bentonite to hydrate.

On November 23, a wireline logging truck was used to check the depth of the bentonite plug. Top of bentonite was found at 168 ft. The well was circulated with fluid from the rig pit (pH 7.5). The well volume was circulated twice while the pH was monitored. Brandon Powell with the OCD witnessed the pH readings and no low pH fluid was detected. This indicated that the low pH water zone is below the bentonite top of 168 ft. An additional 44 cf of "Hole Plug" was dropped via casing. The top of the bentonite drop was found at 108 ft. The OCD directed that the desired depth of bentonite top is to be at 70 ft. All of the "Hole Plug" supply in the Farmington area had been used and only the smaller sized bentonite was available. Visual tests were run on surface to determine if the smaller sized bentonite would work; it was decided to continue the operation with the smaller sized bentonite. Approximately 300 pounds was dropped when a bridge developed from 15 ft to surface. The 2 7/8" tubing was picked up and the bentonite bridge was washed and drilled out. The wellbore was cleaned out to the previous depth of 108 ft.

More "Hole Plug" was ordered from Bariod, with delivery scheduled for November 30. The well was temporarily capped awaiting the additional "Hole Plug". The OCD and BLM were notified of the current well status and plans for continuation of plugging operations.

The rig was released and moved off location November 24.

The additional "Hole Plug" arrived in Farmington, NM on December 4. On December 5, an additional 10 cf of bentonite "Hole Plug" was dropped via the casing. The top of bentonite was confirmed to be at 69 ft. below ground level. The OCD was notified and approval to cement the remainder of the well was granted. On December 9, the well was plugged with 20 sacks of Class B cement from 69 ft. to surface. The OCD witnessed the cement placement. The top of cement inside the casing was checked December 17, the top of cement was found to be at 2.5 ft. below ground level. The P&A marker was welded to the top of the 9 5/8" casing. A pressure gauge was installed on the 9 5/8" casing above the top of cement and below the P&A marker. This will allow the integrity of the cement inside the casing to be monitored.

The traffic diversion was removed and the road was returned to the original configuration. The location was re-contoured and cleaned of all debris.

Closure

Cathodic protection well CPS-1989 was properly plugged and abandoned as required by the OCD, and in accordance with the applicable portions of the New Mexico Administrative Code (NMAC) Title 19 (Natural Resources and Wildlife), Chapter 15, Part 4, Rule 202. The required reports and regulatory filings were prepared by SMA and Enterprise for submission to the OCD and the BLM.

Attachments

1. Sundry Report NMOCD C-103 (Post Job)
2. NOI C 103 (Pre Job 8-21-09)
3. Pit Closure NMOCD C-144 (Post Job)
4. Pit Application NMOCD C-144 (Pre Job 8-21-09)
5. Well Location Plat NMOCD C-102
6. Wellbore Diagram (Pre Job)
7. P&A Wellbore Diagram (Post Job)
8. SMA Daily Report Summary
9. Well Logs 11-20-09
10. Certificate of Waste (EnviroTech)
11. Water Disposal Record (Basin Disposal)

Office
 District I
 1625 N. French Dr., Hobbs, NM 88240
 District II
 1301 W. Grand Ave., Artesia, NM 88210
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 1220 S. St. Francis Dr., Santa Fe, NM
 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 June 19, 2008

OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

WELL API NO. Nearest Producing Well 30-045-07513
5. Indicate Type of Lease Federal BLM FEDERAL <input checked="" type="checkbox"/> STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No. N/A
7. Lease Name or Unit Agreement Name EPCO Cathodic Protection Station
8. Well Number 1989
9. OGRID Number N/A
10. Pool name or Wildcat N/A

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

1. Type of Well: Oil Well Gas Well Other

2. Name of Operator
Enterprise Field Services, LLC

3. Address of Operator
1100 Louisiana Street, Houston, TX 77002-5227

4. Well Location CPS 1989
 Unit Letter A : 620 est feet from the North line and 60 est feet from the East
 East line
 Section 13 Township 28N Range 10W NMPM County San Juan

11. Elevation (Show whether DR, RKB, RT, GR, etc.)
5696 GR

12. 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 checked="" 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"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
DOWNHOLE COMMINGLE <input type="checkbox"/>			
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. 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. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Enterprise Field Services, LLC (Enterprise) shall properly plug and abandon Cathodic Protection Well CPS-1989 by drilling out the concrete surface plug, and removing cables, anodes and coke breeze to a depth of 500 feet (the total depth of the existing well). If insurmountable field conditions prevent reaching the total well depth, the NMOCD will be contacted to determine if a lesser depth is approvable. In no case will interconnected groundwater zones fail to be properly isolated. An experienced drilling contractor (A-Plus Well Service) has been retained for this project, and a plugging rig with a closed loop drilling fluids system will be utilized. Details are provided in an attachment to this form. Enterprise has received verbal approval for the road detours necessary from the Bureau of Land Management (BLM), and will properly control access to the site. These detours are within existing pipeline right-of-ways. A water sample will be obtained from the one-inch cathodic well vent tube while rigging up. This sample will be tested for pH, in order to allow a comparison with the existing pH measurements. Upon reaching the total well depth (or, a lesser depth as approved by the NMOCD), open hole logs will be used to identify water-bearing zones. Enterprise, in conjunction with the NMOCD, is evaluating the most appropriate well plugging material(s). Upon approval, either bentonite, or Class B cement, will be utilized to properly plug the well (see attachments). An approved plugged and abandonment marker will be set at the former well location, including the API number of the nearest well. Enterprise will properly dispose of all liquid and solid waste material at a permitted facility. The location will be re-contoured and reclaimed as required by the surface owner (BLM).

ATTACHMENTS:

Procedure with bentonite and cement plug
 Procedure with cement plug only

Spud Date:

Rig Release Date:

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

SIGNATURE [Signature] TITLE Senior Environmental Scientist DATE 7/22/09

Type or print name: David R. Smith E-mail address: drsmith@epco.com PHONE: (713) 381-2286

For State Use Only

APPROVED BY: [Signature] TITLE SUPERVISOR DISTRICT # 3 DATE AUG 21 2009

Conditions of Approval (None): ARE ATTACHED

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144 CLEZ
July 21, 2008

For closed-loop systems that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, submit to the appropriate NMOCD District Office.

Closed-Loop System Permit or Closure Plan Application

(that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

Type of action: Permit Closure

Instructions: Please submit one application (Form C-144 CLEZ) per individual closed-loop system request. For any application request other than for a closed-loop system that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, please submit a Form C-144.

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1. Operator: EPCO, Inc. OGRID #: _____
Address: 2727 North Loop West, Houston, TX 77008-1044
Facility or well name: Cathodic Well CPS #1989, located near the Burlington, McClanahan #18 Well
API Number: 30-045-07513 OCD Permit Number: _____
U/L or Qtr/Qtr Unit A, NENE Section 13 Township 28 N Range 10W County: San Juan
Center of Proposed Design: Latitude 36° 39' 58.61" Longitude 107° 50' 28.63" NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2. Closed-loop System: Subsection H of 19.15.17.11 NMAC
Operation: Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent) P&A
 Above Ground Steel Tanks or Haul-off Bins

3. Signs: Subsection C of 19.15.17.11 NMAC
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
 Signed in compliance with 19.15.3.103 NMAC

4. **Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.
 Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
 Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
 Closure Plan (Please complete Box 5) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
 Previously Approved Design (attach copy of design) API Number: _____
 Previously Approved Operating and Maintenance Plan API Number: _____

5. **Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)
Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.
Disposal Facility Name: Envirotech Disposal Facility Permit Number: NM-01-0011
Disposal Facility Name: Basin Disposal Disposal Facility Permit Number: NM-01-005
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future service and operations?
 Yes (If yes, please provide the information below) No
Required for impacted areas which will not be used for future service and operations:
 Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
 Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
 Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

6. **Operator Application Certification:**
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.
Name (Print): David R. Smith Title: Senior Environmental Scientist
Signature:  Date: July 20, 2009
e-mail address: drsmith@epco.com Telephone: 713-803-2286

7. **OCD Approval:** Permit Application (including closure plan) Closure Plan (only)
OCD Representative Signature: Brenda Pell **Approval Date:** 8-21-09
Title: Enviro/spec **OCD Permit Number:** _____

8. **Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC
Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.
 Closure Completion Date: _____

9. **Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**
Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.
 Disposal Facility Name: _____ Disposal Facility Permit Number: _____
 Disposal Facility Name: _____ Disposal Facility Permit Number: _____
 Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?
 Yes (If yes, please demonstrate compliance to the items below) No
Required for impacted areas which will not be used for future service and operations:
 Site Reclamation (Photo Documentation)
 Soil Backfilling and Cover Installation
 Re-vegetation Application Rates and Seeding Technique

10. **Operator Closure Certification:**
 I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
 Name (Print): _____ Title: _____
 Signature: _____ Date: _____
 e-mail address: _____ Telephone: _____

Cathodic Protection Station #1989

Current

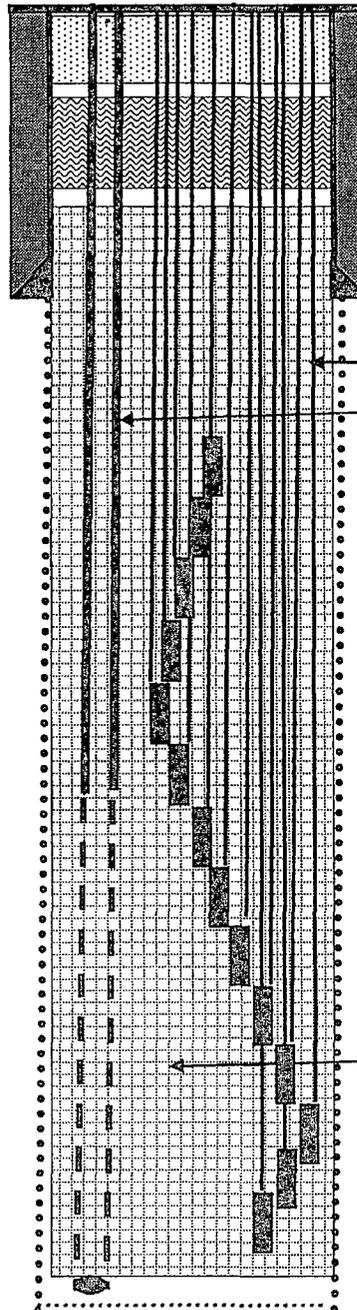
Section 13, T-28-N, R-10-W, San Juan County, NM

Trunk & Lat 2B-28

Today's Date: 7/06/09

Drilled: 10/1/04

Elevation: 5388' GL



Surface Cement – reported 8 sxs Portland
(from surface to approximately 25')

Betonite Plugs – reported 10 – 50 lb sacks
(from 65' to 45' then cemented)

Surface Pipe" 100' of 8" PVC
Cemented with 28 sxs cement

Lead wires from 30 anodes (to surface)

1" PVC Vent pipe from 500' to surface
With perforations at 340'

30 Anodes from 190' – 480'
(2" OD by 60" long)

Coke Breeze – from 500' to 65'
(7800 lbs of Asbury)

7.875" Hole

500' TD

Cathodic Protection Station #1989

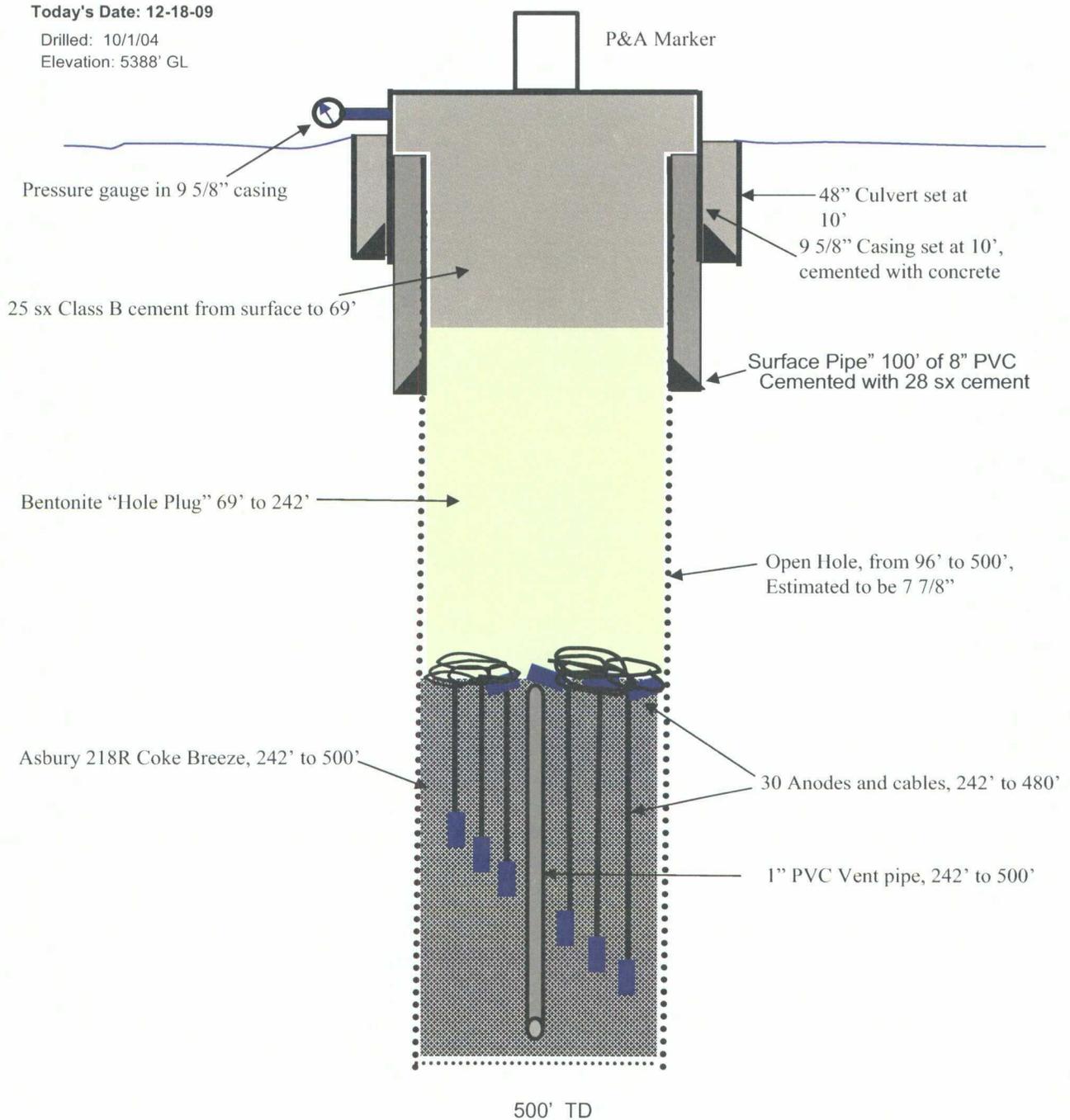
Actual Plugged Well

620' FNL and 60' FEL

Unit A Section 13, T-28-N, R-10-W, San Juan County, NM

Nearest Producing Well; McClanahan #18, API # 30-045-07513

Trunk & Lat 2B-28



Daily Report Summary
for
Enterprise CPS 1989 P&A Project

- 9/29/2009 MI concrete barriers, barrels, set detour signs, redirecting traffic around the CPS 1989 location and work site. Hauled 2 loads road base and leveled with backhoe.
- 9/30/2009 Removed fence, EnviroTech emptied and removed water tank. Moved gravel berm placed a temp fence around wellhead and water barrels.
- 10/7/2009 There has been no work done on location since 9-30-09, We have done maintenance checks on the water level that has collected in the drums and checked the traffic control sign and equipment. It was determined that we set a 330 gal tote to collect water until we are able to get the rig.
- 10/27/2009 The 330 gal tote was set 10-07-09 to collect water from the well. The tote and barrels were emptied 10-19-09 by EnviroTech.
- 10/30/2009 Excavated around 8" PVC casing, placed 15.5' of 9 5/8" casing over PVC casing, placed 10' of 48" culvert over 9 5/8" casing. Poured 11 cu yds concrete inside/outside of the 48" culvert to stabilize the 9 5/8" casing for P&A work.
- 11/2/2009 Start to move in rig and associated equipment
- 11/3/2009 Rig up rig and all associated equipment, hauled 3 loads of water. Drilled 6' into the 8" PVC.
- 11/4/2009 Start drilling at 5', drill to 12'. Wire is balling up and slowing progress. We have been careful not to drill out of 8" PVC.
- 11/5/2009 Drill from cement from 7' to 20'. Drilled bentonite from 20' to 62'. Started drilling coke breeze at 62'. Had to trip bit several times to clear balled up wire and PVC above the bit. SD at 63'.
- 11/6/2009 Well flowed about 5 barrels of water overnight. Used a wash over pipe with some success and a corkscrew tool with some success. Cleaned out hole from 63' to 87'. After each time we had SD to clean out the wash over pipe, the returns pH dropped to 3.5 for several barrels, then back up to 10.5 after the low pH water that had flowed into the well bore was circulated to surface.
- 11/9/2009 Started at 86'. Made 3 runs with the 5 1/2" corkscrew, 1 trip with wash over pipe, 1 trip with open tubing, 1 trip with a 3 1/2" corkscrew and finished with 1 trip with the 5 1/2" corkscrew. Total depth 130'. End of casing found at +/- 100'.
- 11/10/2009 Started at 130', Washed down with 2 3/8" mule-shoe joint on 2 7/8" tbg to 160'. Pulled out and then made 2 trips with 3 1/2" corkscrew, 2 runs with 5 1/2" corkscrew, washed down with tubing to 196', made 3 1/2" corkscrew run. This was the best run yet, 15 strands of wire +/- 20' long. It appears that we get the best wire retrieval by: Washing down with mule-shoe tubing to clear coke breeze while leaving wires as undisturbed as possible, then use small corkscrew followed by larger corkscrew.
- 11/11/2009 Made a trip to check for more wire, did not get much, ran tubing and cleaned out to 245'. Ran corkscrew, made a grapple and got good retrieval with it. Could not get past 206' with any tools. We may have an anode stopping the tools.
- 11/12/2009 Waited 4 hr for A Plus to make rig repairs and modifications. Tripped in with small corkscrew to jar obstruction at 196', very small retrieval, tripped in with wash pipe, cleaned out and rotated down to 206'. Wash pipe plugged with formation and some wire. In with large corkscrew, pulled out, stuck in bell nipple. When we used the wash over pipe to fish the obstruction, (possibly an anode) we may have "drilled" along side the anode into the formation.
- 11/13/2009 We got tool (from yesterday) unstuck, wellhead back on. Made a grapple run, broke grapple, milled on obstruction with hard-surfaced cutter, no progress, TIH past obstruction to clean out more hole, Ground began to subside by wellhead, Called NMOCD, BLM, will meet Monday. SD secured location

- 11/14/2009 1000. Checked the catchment that was made to trap any water that may have flowed from the subsided area around the wellhead. The area was clear, no signs of any water around the wellhead. There was about another inch of subsidence evident.
- 11/16/2009 Met with Bill Clark, Brandon Powell and Denny Foust. NMOCD wants us to continue to get coke breeze out of the well. Set up rig. Meeting at SMA office for plan forward.
- 11/17/2009 Rigged up new larger wellhead and 7 1/2" wash pipe, wash down to 212', past the previous obstruction. Empty rig pit and take waste to EnviroTech landfarm.
- 11/18/2009 Ran 7 1/2" wash pipe to 226', ran corkscrew, plugged with shale. Ran bit to 235'. Then ran corkscrew to 220', torqued up, pulled large amount of wire.
- 11/19/2009 Ran 7 1/2" wash pipe to 226', ran corkscrew, plugged with shale. Ran bit to 235'. Then ran corkscrew to 220', torqued up, pulled large amount of wire. Water flow to surface has increased. It appears that a wad of wire with anodes is at 245'. We can get through it with some difficulty with tubing but have not been able to pull wire.
- 11/20/2009 Trip in with wash pipe to 230', worked down to 235'. Pull out, wash pipe had 1 1/2' shale and some wire. Decision made to plug well at current depth. NMOCD granted conditional P&A approval. Ran open hole logs. Trip in with tubing washing down to 260', spot 4 cu ft bentonite. Pull out, dump 46 cu ft bentonite down. Tried to spot more bentonite down tubing at 260-250' but tubing plugged after 4 cu ft. Pumped bentonite out of tubing with pump truck. Tripped out and started to fill open hole with bentonite via casing.
- 11/23/2009 Tested depth of Friday's bentonite drop, was 168'. Circulate hole, checking pH, low pH fluid influx shut off. Dropped 44 bags of 3/8" bentonite, checked depth, now at 108'. Dropped granular bentonite, bridged at surface. Rigged up and washed out bentonite with tubing. Start rig down. Need to find more 3/8" bentonite. None now available locally.
- 11/24/2009 Cleaned out wellbore of bentonite bridge with spade bit and tubing, circulated to 100'. Trip out, lay down tubing and rig down rig and equipment. Cut 9 5/8" casing above the 2" valve, welded a temp plate on top of the casing to secure. Notified NMOCD and BLM of plans. Rig off location at 1500.
- 12/5/2009 Cut temporary plate off wellhead, found bentonite depth @ 98'. Drop 10 bags "Hole Plug", checked depth at 69'. Derrick Vigil w/ NMOCD witnessed. Re-sealed wellhead.
- 12/9/2009 Cut off temporary plate at wellhead, Checked bentonite depth @ 69'. Pumped 20 sacks cement in well bore from 69' to surface. Derrick Vigil w/ NMOCD witnessed. Wait on cement to set before setting the P&A marker.
- 12/10/2009 Clean out rig pit. Move pit back to A Plus
- 12/14/2009 Checked The top of cement inside the 9 5/8" casing. The top of cement was found at 2.5 ft below ground level. Set up traffic barrels.
- 12/17/2009 Checked The top of cement inside the 9 5/8" casing. The top of cement still at 2.5 ft below ground level. Welded P&A marker on the casing. Removed all traffic diversion and barriers. Re-contoured the location and returned the roads to the original configuration. Final field work report.
- 12/18/2009 Installed Pressure gauge on 9 5/8" casing as per NMOCD request

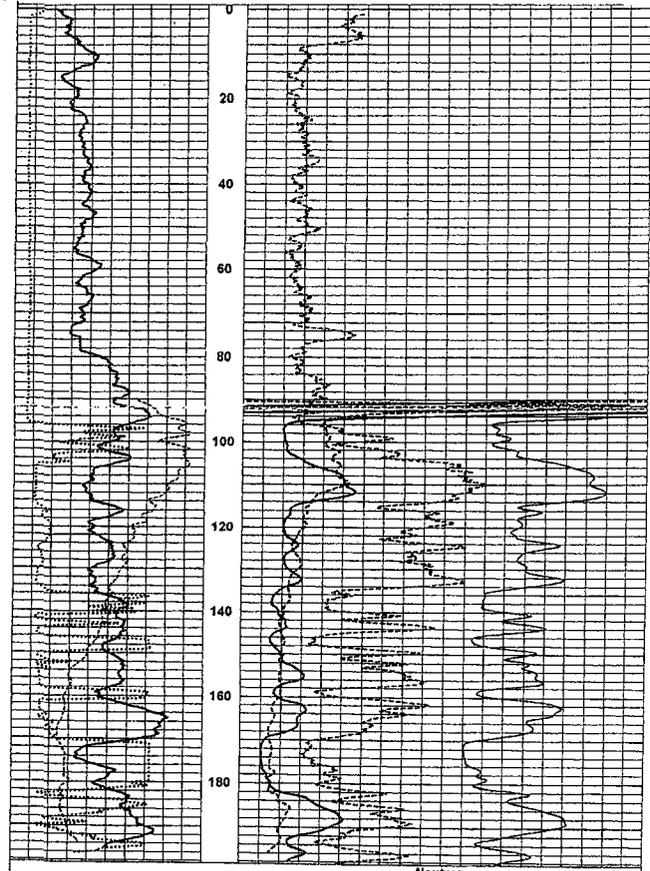
JET WEST

GEOPHYSICAL SERVICES, LLC.

Nothing: Easting:	COMPANY EPCO		
	WELL ID EPCO CPS 1989		
	FIELD		
	COUNTY San Juan	STATE New Mexico	
TYPE OF LOG: GR/Electric/Caliper/Neutron			
LOCATION			
SEC 13 TWP 28 N RGE 10 W			API No.
PERMANENT DATUM Ground Level		ELEVATION 5696 ft.	K.B.
LOG MEAS. FROM Ground Level		ABOVE PERM. DATUM	T.O.C
DRILLING MEAS. FROM Ground Level			G.L. 5696 ft
DATE	11-20-2009	TYPE FLUID IN HOLE	Water/Fresh Mud
RUN No.	One	SALINITY	
TYPE LOG	NUX & Poly	DENSITY	
DEPTH-DRILLER	230 ft.	LEVEL	Full
DEPTH-LOGGER	200 ft.	MAX REG. TEMP	
BTM LOGGED INTERVAL	199 ft.	DIGITIZE INTERVAL	0.2 ft.
TOP LOGGED INTERVAL	Surface		
OPERATING RIG TIME			
RECORDED BY	M. Peterson		
WITNESSED BY	Souder Miller		

RUN NO.	BOREHOLE RECORD			CASING RECORD			
	BIT	FROM	TO	SIZE	WGT.	FROM	TO
1	7 in.	0 ft.	235 ft.	8 in.	PVC Sch40	0 ft.	96 ft.
2	6.5 in.	96 ft.	235 ft.				
3							

REMARKS:



Caliper	7	Inches	17	Neutron	0	API	1500
Gamma Ray	0	CPS	150	64" Normal Resistivity	0	Ohm-m	100
SP	0	mV	700	16" Normal Resistivity	0	Ohm-m	100
Depth	0	ft	500		0	Ohm-m	100
			1:240			SPR	10
						ohm	30

District I
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District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

Sonder Miller PO 248 Farmington NM 87499
State of New Mexico
Energy Minerals and Natural Resources 03117-0015
Form C-138
Revised March 12, 2007
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505
*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address: EPCO
2. Originating Site: CPS 1989
3. Location of Material (Street Address, City, State or ULSTR): Sec, 13, T 28N, R10W, San Juan, NM
4. Source and Description of Waste: Produced water, drill cuttings, coke breeze EnviroTech is authorized to sign Contractor Waste Testing Certificate Estimated Volume <u>6 yds</u> yd ³ / bbls Known Volume (to be entered by the operator at the end of the haul) <u>30</u> (bbl) bbls
5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS I, <u>Loren Diede</u> representative or authorized agent for <u>EPCO</u> do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification) <input type="checkbox"/> RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. <u>Operator Use Only: Waste Acceptance Frequency</u> <input type="checkbox"/> Monthly <input type="checkbox"/> Weekly <input type="checkbox"/> Per Load <input checked="" type="checkbox"/> RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items) <input checked="" type="checkbox"/> MSDS Information <input type="checkbox"/> RCRA Hazardous Waste Analysis <input type="checkbox"/> Process Knowledge <input type="checkbox"/> Other (Provide description in Box 4)
GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS I, <u>April E Pohl</u> , representative for <u>EnviroTech Inc</u> do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.
5. Transporter: PACE/SCAT Hot Wash

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: EnviroTech Inc Soil Remediation Facility Permit # NM-01-0011

Address of Facility: Hilltop, NM

Method of Treatment and/or Disposal:

Evaporation Injection Treating Plant Landfarm Landfill Other

Waste Acceptance Status:

APPROVED

DENIED (Must Be Maintained As Permanent Record)

PRINT NAME: April E Pohl

TITLE: Landfarm Administrator DATE: 11-17-09

SIGNATURE: April E Pohl
Surface Waste Management Facility Authorized Agent

TELEPHONE NO.: 505-632-0615

Phone: 505-632-0615, FAX: 505-632-1865, Email; apohl@envirotech-inc.com

DISTRICT II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-138
Revised March 12, 2007

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address:

EPCO

2. Originating Site:

CPS 1989

3. Location of Material (Street Address, City, State or ULSTR):

Sec. 13, T 28N, R10W, San Juan, NM

4. Source and Description of Waste:

Produced water, circulation flow-back

Estimated Volume 160 bbls yd³ / bbls Known Volume (to be entered by the operator at the end of the haul) yd³ / bbls

5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I, Loren Diede [Signature] representative or authorized agent for EPCO do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. Operator Use Only Waste Acceptance Frequency: Monthly Weekly Per Load

RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

MSDS Information RCRA Hazardous Waste Analysis Process Knowledge Other (Provide description in Box 4)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

 , representative for do hereby certify that representative samples of the field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

Transporter:

Three River Trucking

Permitted Surface Waste Management Facility

Name and Facility Permit #: Basin Disposal Permit # NM-01-0005

Address of Facility: 200 Montana, Bloomfield, NM

Method of Treatment and/or Disposal:

Evaporation Injection Treating Plant Landfarm Landfill Other

Acceptance Status:

APPROVED

DENIED (Must Be Maintained As Permanent Record)

FNAME:

John Volkerding

TITLE:

Gen Mgr

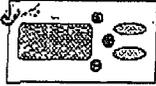
DATE:

12/28

ATURE:

[Signature]
Surface Waste Management Facility Authorized Agent

TELEPHONE NO.:



BASIN DISPOSAL, INC.

SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD
P.O. BOX 100 • AZTEC, NEW MEXICO 87410 • PHONE (505) 832-8936

NO. **476850**

NMOC D PERMIT: NM-001-0005

Oil Field Waste Document, Form C133

INVOICE:

DATE 11-23-09

DEL. TKT# 418577

GENERATOR: Sauder Miller & ASC

BILL TO: Sauder Miller & ASC

HAULING CO. 3 Rivers

DRIVER: Martha Thomas

(Print Full Name)

ORDERED BY: Loren DeDee

CODES: _____

WASTE DESCRIPTION: Exempt Oilfield Waste Produced Water Drilling/Completion Fluids Reserve Pit

STATE: NM CO AZ UT TREATMENT/DISPOSAL METHODS: EVAPORATION INJECTION TREATING PLANT

NO.	TRUCK	LOCATION(S)	VOLUME	AM	PM	COST	TOTAL	TIME
1	143	CTS 1989	80 MT			95	76.00	NOV 23 1:48P
2	143	CTS 1989	80 MT			95	76.00	NOV 23 3:39P
3								
4								
5								
TOTAL							152.00	

Martha Thomas

representative or authorized agent for the above generator and hauler hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination that the above described waste is RCRA Exempt, Oil field wastes generated from oil and gas exploration and production operations and not mixed with non-exempt waste, per OCD's mixing policy.

Approved

Denied

ATTENDANT SIGNATURE: Stanley Comaley

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Form C-138
Revised March 12, 2007

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

*Surface Waste Management Facility Operator
and Generator shall maintain and make this
documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. Generator Name and Address:
EPCO 3621 E. Main, Farmington, NM

2. Originating Site:
CPS 1989 Sec. 13, T28N, R10W San Juan County, NM

3. Location of Material (Street Address, City, State or ULSTR):
See above

4. Source and Description of Waste:
Produced Water, Drilling Fluids, Completion Fluids, Reserve Pit Sludges

Estimated Volume 45 yd³ (bbls) Known Volume (to be entered by the operator at the end of the haul) _____ yd³ / bbls

5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I, Loren Diederich representative or authorized agent for EPCO do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. Operation Use Only Waste Acceptance Frequency: Months Weeks Per Load

RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

MSDS Information RCRA Hazardous Waste Analysis Process Knowledge Other (Provide description in Box 4)

GENERATOR 19-15-36-15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

I, _____ representative for _____ do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chlorides content and that the sample have been found to conform to the specific requirements applicable to landfills pursuant to Section 15-19-15-36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15-19-15-36 NMAC.

5. Transporter:
Three Rivers Trucking

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: BASIN DISPOSAL, NM-001-0005

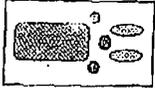
Address of Facility: 200 MONTANA, BLOOMFIELD, NM 87413 FAX 505-632-2215/505-334-8729
EMAIL: bdinc@digii.net

Method of Treatment and/or Disposal:
 Evaporation Injection Treating Plant Landfarm Landfill Other

Waste Acceptance Status: APPROVED DENIED (Must Be Maintained As Permanent Record)

PRINT NAME: John Volharding TITLE: Gen Mgr DATE: 12/28/07

SIGNATURE: [Signature] TELEPHONE NO.: _____
Surface Waste Management Facility Authorized Agent



BASIN DISPOSAL, INC.

SPECIALIZING IN DISPOSAL OF PRODUCED WATER AND DRILLING MUD
P.O. BOX 100 • AZTEC, NEW MEXICO 87410 • PHONE (505) 892-8838

NO. **475827**

NMOC D PERMIT: NM-001-0005

Oil Field Waste Document, Form C138

INVOICE:

DATE 11-13-09

DEL. TKT# 418629

GENERATOR: SMA

BILL TO: SMA

HAULING CO. 3 RIVERS

DRIVER: J. D. BIZELL

(Print Full Name)

ORDERED BY: LOREN DIEDER

CODES: _____

WASTE DESCRIPTION: Exempt Oilfield Waste Produced Water Drilling/Completion Fluids Reserve Pit

STATE: NM CO AZ UT TREATMENT/DISPOSAL METHODS: EVAPORATION INJECTION TREATING PLANT

NO.	TRUCK	LOCATION(S)	VOLUME	AM	PM	COST	TOTAL	NO. OF TIMES	TIME	PER
1	<u>158 SPS 1989</u>		<u>45</u>			<u>950</u>	<u>76⁰⁰</u>			
2										
3										
4										
5										
TOTAL										

I, J. D. Bizell representative or authorized agent for the above generator and hauler hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination that the above described waste is RCRA Exempt, Oil field wastes generated from oil and gas exploration and production operations and not mixed with non-exempt waste, per OCD's mixing policy.

Approved

Denied

ATTENDANT SIGNATURE: _____