



New Mexico Cattle Growers' Association

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October 9, 2003

NOV 06 2003

To: Oil Conservation Commission
From: Caren Cowan, Executive Director
New Mexico Cattle Growers' Association
Subject: Non-Technical Testimony
By New Mexico Cattle Growers' Association
For The Proposed Draft Pit Rule

OIL CONSERVATION
DIVISION

Enforcement of existing regulations leaves much to be desired. Ideally, we would like to see enforcement of the present regulations now in effect, reach a consistent level before new regulations are considered for adoption.

However, if the new pit rule is adopted, we have the following comments and concerns:

1. All pits should be lined.
2. No pits should be located on flood plains.
3. No silicone material should be allowed in the pit. The silicone causes the contents of the pit to become thick and syrupy, which makes the contamination even more damaging to the environment.
4. Present practices allow for the liner to simply be buried at the site; and other garbage is being buried along with the liner. The possibility of seepage into groundwater, causing contamination, is increased greatly by this practice. The liner and all other materials associated with the site should be disposed of at a designated OCD waste site, only. Fresh soil should replace what has been taken out, to aid in returning the land to its original integrity.
5. Mud pits are allowed to sit and dry or seep into the ground; then dirt is pushed over them.
6. Whenever a pit is closed, dismantled, and buried, the contamination is spread over a much larger surface, increasing the odds of contamination. Our members tell us that no reclamation of the sites seems possible. Some pit sites in the southeast part of the state are over 40 years old, and nothing but noxious weeds can grow over them. The best-case scenario is to use steel tanks, lined with plastic to insure that the site is free from contamination to the soil or ground water or surface water

Thank you for the opportunity to comment.

Sincerely,


Caren Cowan

Executive Director

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