



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, appearing to read "David Catanach".

David Catanach
UIC Director

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

JHm

KELLAHIN, KELLAHIN AND AUBREY

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN
KAREN AUBREY

CANDACE HAMANN CALLAHAN

JASON KELLAHIN
OF COUNSEL

TELEPHONE (505) 982-4285
TELEFAX (505) 982-2047

October 4, 1990

Mr. Jim Morrow
Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504

HAND DELIVERED

Re: Application for Conoco, Inc.
for Two Salt Water Disposal
Wells, Lea County, New Mexico
NMOCD Case No. 10106
NMOCD Case No. 10107

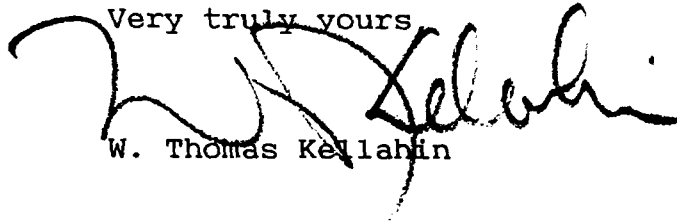
Dear Mr. Morrow:

At the conclusion of the presentation of the evidence for the consolidated Cases 10106 and 10107 I requested the opportunity to submit my certificate notification to SW Cattle Company which demonstrated that they had the required twenty day notice period prior to the hearing.

Please find enclosed my certificate.

In addition, I am informed by Conoco that they have met with Mr. Trent Stradley of SW Cattle Company concerning its letter to the Division and that all matters have been resolved to the satisfaction of SW Cattle Company and Conoco.

Very truly yours



W. Thomas Kellahin

WTK/tic
Enclosure

cc: Mr. Jerry Hoover

RECEIVED

OCT - 5 1990

OIL CONSERVATION DIV.
SANTA FE

S-W CATTLE CO.

P.O. BOX 1790
HOBBES, NEW MEXICO 88241

2-1990

Robert G. Stovall, Attorney
State of New Mexico
Oil Conservation Division
Santa Fe, NM

Fax 827-5741

RE: Application Of Conoco, Inc. For Authority to Convert Its SEMU Wells
No. 9 and 95 To Saltwater Disposal

S W Cattle Company, the fee land owner, would like to go on record
as being opposed to the above application from Conoco.

The reason for this request to intervene is because of numerous
leaks and damages sustained by the landowner from Conoco's ongoing
recovery of oil and the loss of dialogue between Conoco and the
land owner, (ie- no notification of damages).

S W Cattle Company


W. T. Stradley, President

ILLEGIBLE

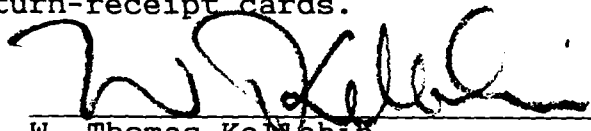
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION
OF CONOCO, INC. FOR TWO SALT WATER
DISPOSAL WELLS, LEA COUNTY,
NEW MEXICO

CASE NO. 10106
CASE NO. 10107

CERTIFICATE OF MAILING
AND
COMPLIANCE WITH ORDER R-8054

In Accordance with Division Rule 1207 (Order R-8054) I hereby certify that on September 12, 1990, notice of the hearing and a copy of the Application for the above referenced case was mailed by certified mail return-receipt, at least twenty days prior to the hearing set for October 3, 1990, to the parties shown in the application as evidenced by the attached copies of return-receipt cards.


W. Thomas Kellahin

SUBSCRIBED AND SWORN to before me this 4th day of
October, 1990.


Notary Public

My Commission Expires:

7-6-91

RECEIVED

OCT - 5 1990

OIL CONSERVATION DIV.
SANTA FE

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: SW Cattle Co. P.O. Box 549 Hobbs, NM 88241 Re: Conoco SWD (WTK)	4. Article Number P 572 125 132 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>H. Kinnels</i>	7. Date of Delivery <i>SEP 17 1990</i>

PS Form 3811, Apr. 1989

* U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

RECEIVED

OCT - 5 1990

OIL CONSERVATION DIV.
 SANTA FE



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

January 25, 1991

Bruce King
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Conoco Inc.
10 Desta Drive West
Midland, TX 79705

Attn: Jerry Hoover

Re: SEMU #95-J Sec. 23, T20S, R37E - R-9327 (SWD) *case 10 107*
SEMU #9-0 Sec. 23, T20S, R37E - R-9328 (SWD) *case 10 106*

Gentlemen:

As per your conversation with Evelyn Downs of this office the above-referenced wells are to be converted to disposal well as authorized by orders R-9327 and R-9328.

However, the intention filed with the BLM indicates you plan to injection into intervals not authorized by said orders. After conferring with Jim Morrow, OCD Santa Fe, it is recommended that you submit a letter to Santa Fe with a copy to Hobbs stating that you desire to inject into interval other than what was authorized by orders along with a strip log of the San Andres indicating that your proposed perforations will all be in the San Andres formation.

This documentation should clear up the matter.

Very truly yours,

OIL CONSERVATION DIVISION

Jerry Sexton
Jerry Sexton
Supervisor, District I

ed

P.S. The proposed injection interval for #95 is only 64 feet outside the approved interval 4160-5020 and may not need any additional clarification. However, you may want to visit with Jim Morrow in Santa Fe office on this. His phone number is (505) 827-5809.



Midland Division
Exploration and Production

Conoco Inc.
10 Desta Drive West
Midland, TX 79705-9982
(915) 686-5400

DIVISION

February 1, 1991

91 FEB 5 AM 9 40

Mr. Jim Morrow
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

Dear Mr. Morrow:

Application for Conoco, Inc. For Two
Salt Water Disposal Wells, SEMU No. 9
and SEMU No. 95, Lea County, New Mexico
NMOCD Case No. 10106, NMOCD Case No. 10107

On October 19, 1990, Order Nos. R-9328 and R-9327 were issued approving injection into the SEMU No. 9 and SEMU No. 95 respectively. Specific perforation intervals within the San Andres were established in these orders for each well. In log and wellbore evaluation subsequent to the hearing, it has been determined that additional San Andres intervals, outside the limits of the Orders, would be desirable to maximize the efficiency of salt water disposal in these wells.

Acting on verbal approval of the Hobbs District Office, who conferred with you by phone, the following San Andres intervals will be perforated in these two wells:

SEMU NO. 9: 4106'-5103'
SEMU NO. 95: 4676'-5084'

Enclosed are log copies of the entire San Andres section for these wells. The log for SEMU NO. 9 shows the perforations that already exist in the San Andres on the right side of the depth track and the proposed new perforations on the left. Notice that the indicated upper sets of perforations at 4106'-34', 4153'-85', 4283'-4308', 4317'-50', and 4355'-84' and the lower set at 5097'-5103' are outside the interval stated in the order for this well.

The SEMU NO. 95 conversion is a totally new completion in the San Andres and our currently proposed perforation interval exceeds the stated interval in its order only from 5021'-84'. When we submitted preliminary completion diagrams at the hearing I did not realize that those specific intervals would be set as limits within the San Andres in the order. Thank you for your assistance in this matter.

Very truly yours,

Jerry W. Hoover
Regulatory Coordinator

JWH/tm

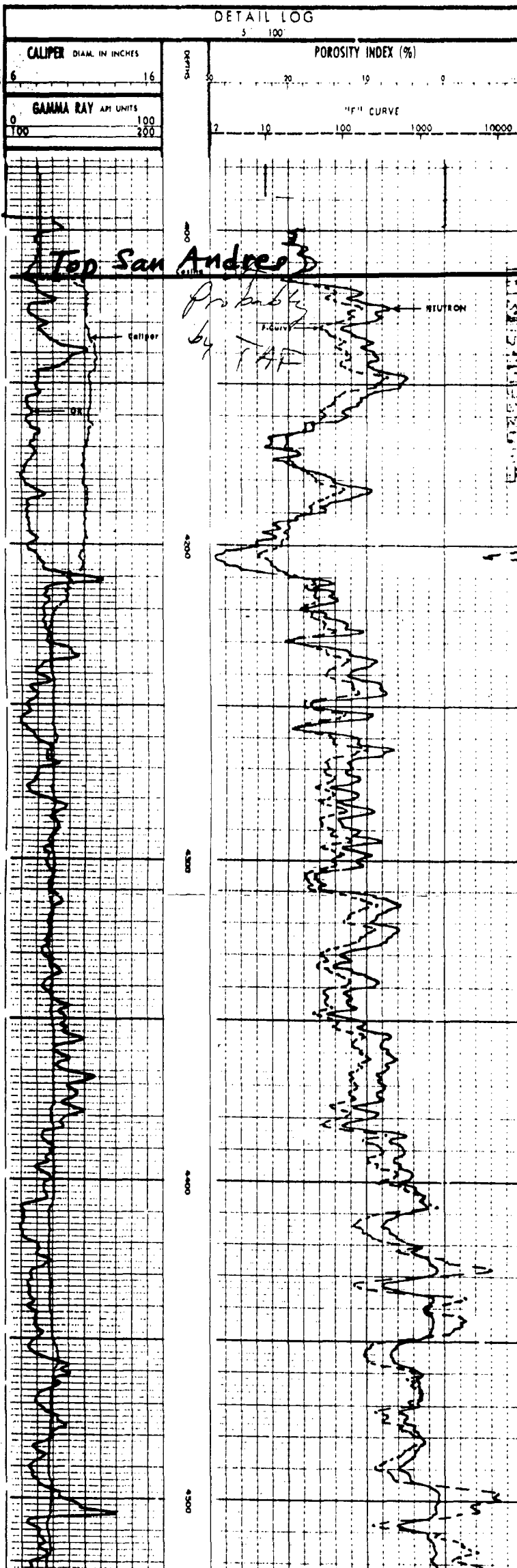
enclosures

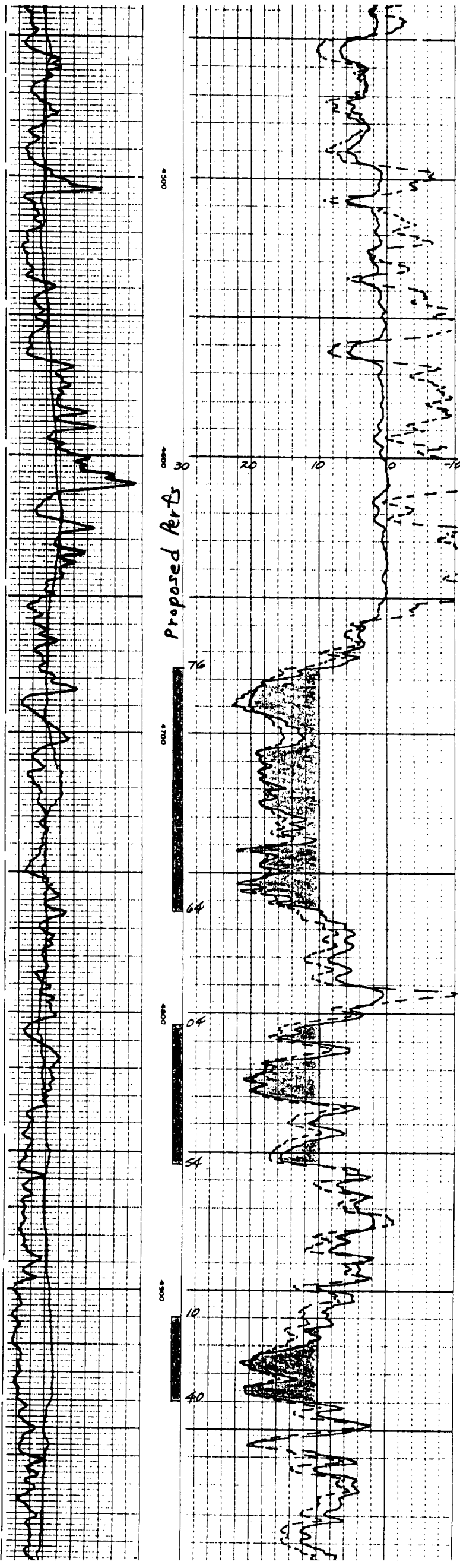
#95 Order approved

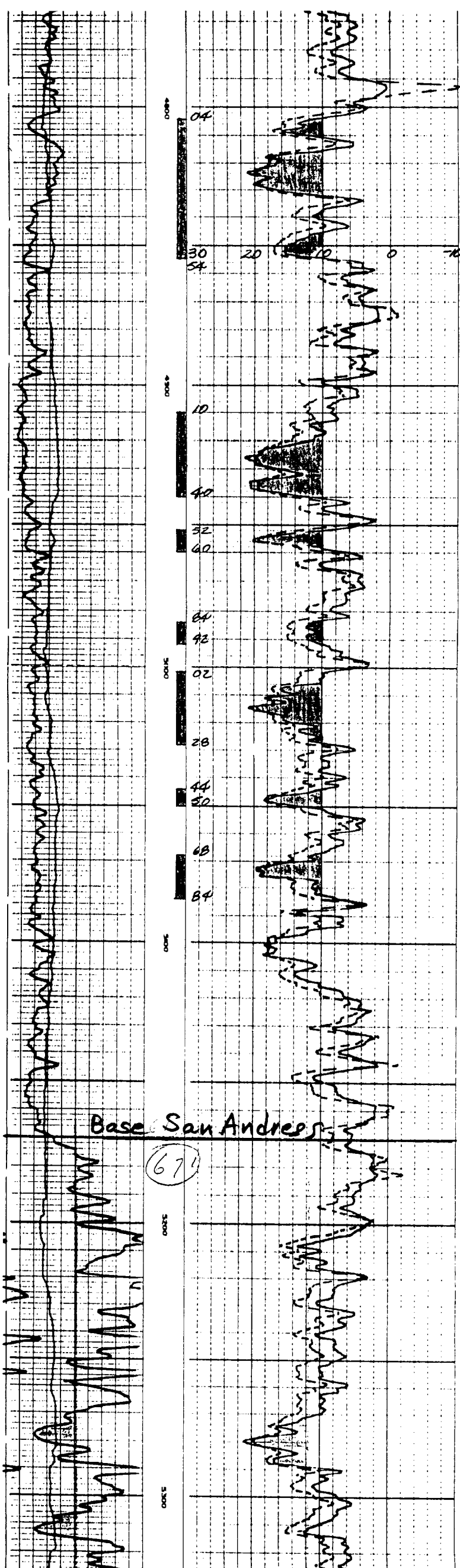
approximately 4160-5020
- will Perf 4676-5084
looks ok

2-7-91

CALIPER DIAM. IN INCHES 6 16		POROSITY INDEX (%) 0 10 20 30	
GAMMA RAY API UNITS 0 100 200		DEPTH 0 100 200	
COMPANY <u>CONTINENTAL OIL COMPANY</u>		SCHL. FR. <u>7249</u>	
WELL <u>SEM. PENN #95</u> <u>12-29-74</u>		SCHL. TD. <u>7250</u>	
FIELD <u>CASS. PENN</u>		DRLR TO <u>7249</u>	
COUNTY <u>LEA</u> STATE <u>NEW MEXICO</u>		Flow: KA <u>3532</u>	
		DI <u>3523</u>	









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.:

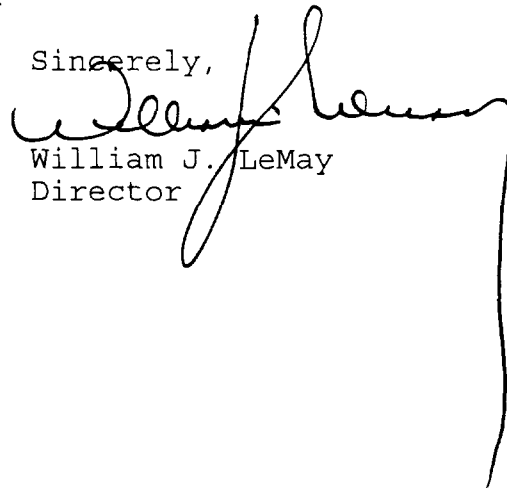
<u>WELL NAME</u>	<u>WELL LOCATION</u>	<u>PERMIT NUMBER</u>
SEMU SWD No. 95	Unit J, Section 23, T-20S, R-37E Lea County, New Mexico	R-9327
King SWD No. 1	Unit C, Section 9, T-20S, R-25E Eddy County, New Mexico	R-5250

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 fluid and cursive, with a long, sweeping underline that extends downwards and to the right.

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:

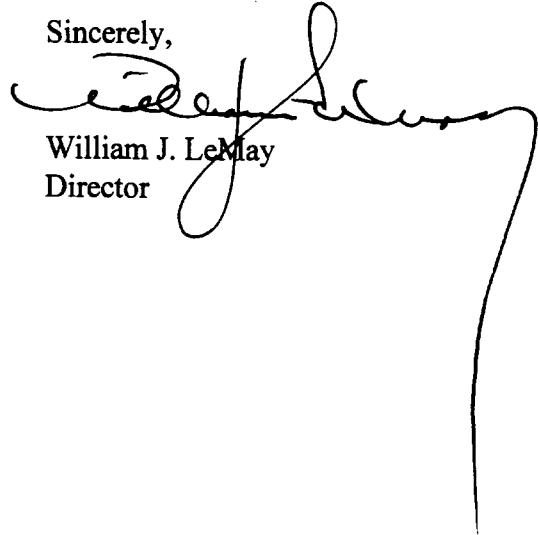
<u>OPERATOR</u>	<u>WELL NAME</u>	<u>WELL LOCATION</u>	<u>PERMIT NO.</u>
Conoco Inc.	SEMU SWD No. 95	J-23-20S-37E Lea County, N.M.	R-9327
Yates Petroleum Corporation	King SWD No. 1	C-9-20S-25E Eddy County, N.M.	R-5250

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