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Telephone 982-4285 Area Code 505

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July 10, 1984

JUL 1 1 1984

OIL CONSERVATION DIVISION

Mr. Joe D. Ramey
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

"Hand Delivered"

CCL28 8291

Re: Pollution Control

Dear Mr. Ramey:

On behalf of Pollution Control Inc., please find enclosed an application for an Amendment to Order R-3221 which we would appreciate you setting for the Examiner hearing now scheduled for August 8, 1984.

We have not prepared or filed a form C-108 under the assumption that those rules and procedures do not apply to this application. If that is not correct, please advise me.

~ KOU

WTK:ca Enc.

cc: Larry Squires
Pollution Control Inc.
P. O. Box 1060
Lovington, New Mexico 88260

Mr. T. E. Kelly Geohydrology Associates Inc. 4015 Carlisle N.E., Suite A Albuquerque, New Mexico 87107

STATE OF NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS OIL CONSERVATION DIVISION

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JUL 1 1989

OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION
OF POLLUTION CONTROL INC. FOR AN
AMENDMENT TO ORDER R-3725 AND AN
EXCEPTION TO ORDER NO. R-3221,
AS AMENDED, LEA COUNTY, NEW MEXICO.

CASE: 8292

APPLICATION

Comes now POLLUTION CONTROL INC. by and through its attorneys, Kellahin & Kellahin, and applies to the New Mexico Oil Conservation Division to amend Order R-3725 and authorize the expansion of the existing disposal facility in the vicinity of Laguna Gatuna to include the SW/4SW/4 of Section 17, T20S, R32E, NMPM, Lea County, New Mexico, and in support thereof would show:

- 1. In accordance with the provisions of Commission Order R-3725 entered April 16, 1969, Applicant, Pollution Control Inc., has operated a disposal facility on the North side of Laguna Gatuna within the NE/4NW/4 of Section 18, T20S, R32E, NMPM, Lea County, New Mexico.
- 2. That applicant desires approval to expand the facility to the Southeast side of Laguna Gatuna within the SW/4SW/4 of Section 17, T20S, R32E, NMPM, Lea County, New Mexico.

- 3. That Applicant proposes to utilize the expanded facility for the disposal of water and brines collected in association with oil well production and for the disposal of solid oil-field waste products including, drill cuttings and drilling mud.
- 4. That the applicant proposes to utilize the expanded facility at a rate combined with its existing Laguna Gatuna facility so that the total combined discharge from both sites does not exceed 30,000 barrels of brine per day.
- 5. That the salt springs and brine associated with Laguna Gatuna are more highly mineralized than water collected from oil wells in the immediate area.
- 6. That Laguna Gatuna is a suitable disposal site for as much as 30,000 barrels of brine per day.
- 7. That there is no evidence that the fifteen years of operation by Pollution Control Inc. has adversely impacted the hydrological system in the vicinity of Laguna Gatuna and that continued operations as proposed will not endanger the pre-1969 conditions.
- 8. That Laguna Gatuna is a satisfactory repository for solid oil-field waste products.

WHEREFORE, applicant requests that the application be set for hearing and that after notice and hearing the application be granted as requested.

Kellahin & Kellahin

W. Thomas Kellahin

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