

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE HEARING)
CALLED BY OIL CONSERVATION)
DIVISION UPON ITS OWN)
MOTION TO PERMIT PETRO-THERMO)
CORPORATION TO APPEAR AND)
SHOW CAUSE WHY ITS FORM)
C-133, AUTHORIZATION TO HAUL)
WATER, SHOULD NOT BE CANCELLED)
FOR NON-COMPLIANCE WITH OIL)
CONSERVATION DIVISION REGULATIONS)

Case No. 9051

AFFIDAVIT

STATE OF NEW MEXICO)
) SS.
COUNTY OF LEA)

COMES NOW Daniel C. Roberts, who being first duly sworn, upon oath, states that:

1. He is the shop foreman and welder employed by Petro-Thermo Corporation;

2. He received, on or about September 10, 1986, reports that Petro-Thermo Corporation Trailer #47 was experiencing some small leaks in the vicinity of the rear sump;

3. Under his direction, Trailer #47 was steam-cleaned to remove any trace of produced water from previous use. After steam-cleaning, Trailer #47 was drained over the concrete-lined sump at the Petro-Thermo Corporation trucking terminal in Hobbs. The contents of the sump were removed by vacuum truck and transported to the Goodwin Treating Plant.

BEFORE EXAMINER STOGNER	
OIL CONSERVATION DIVISION	
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4. Several days later, he checked the hatches, discharge valves and sump of Trailer #47 with a certified gas detection meter (Explosion Meter, Model 2A, Mane Safety and Appliance Company, Serial Number 78605). His check was part of his normal pre-welding operating procedure. His check did not reveal the presence of any gases which might accumulate in a trailer used to transport produced water. He then welded Trailer #47;

5. After welding, he personally supervised the partial filling of Trailer #47 from the overhead loader in the trucking terminal. He assured that sufficient fresh water was loaded into Trailer #47 to stress the new welds. The fresh water remained in Trailer #47 overnight. Trailer #47 did not leak.


6. Prior to using Trailer #47, the fresh water was dispersed on the ground at Petro-Thermo Corporation yard.

FURTHER, AFFIANT SAITH NOT.



DANIEL C. ROBERTS

SUBSCRIBED AND SWORN TO before me this 5th day of January,
1987.



Notary Public

My Commission Expires:

February 13, 1990