

**BW - 2**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

1996 → 1980

# EDDIE SEAY CONSULTING

601 W. ILLINOIS  
HOBBS, NEW MEXICO 88240  
(505) 392-2236  
FAX (505) 392-6949

ENVIRONMENTAL,  
GEOLOGICAL & REGULATORY  
SPECIALISTS

PEAK  
CONSULTING SERVICES



November 4, 1996

Mr. Mark Ashley  
NMOCD Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

RE: P & S Brine, Eunice, NM

Dear Mr. Ashley:

The pit that you and I discussed at P & S Brine Station was used for emergency overflow of the brine tank and also for the fresh water pump which had plunger leaking. No one had any knowledge of any brine going to the pit, but freshwater did. Soil samples were taken at the pit area at approximately 18" depth and analyzed for TPH and CL (find results within). After fiberglass tanks were installed, pit was covered. I hope this analysis will help in answering any questions you may have.

If I can be of further help or if you need additional information, please call.

Sincerely,

Eddie W. Seay, Agent



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

PHONE (806) 796-2800 • 5262 34th ST. • LUBBOCK, TX 79407

ANALYTICAL RESULTS FOR  
EDDIE SEAY CONSULTANTS  
601 W. ILLINOIS  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 10/25/96  
Reporting Date: 10/29/96  
Project Number: NOT GIVEN  
Project Name: P&S BRINE/PAUL PRATHER  
Project Location: EUNICE, NM

Sampling Date: 10/25/96  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC/GP

LAB NUMBER	SAMPLE ID	TPH (ppm)	CI (ppm)
ANALYSIS DATE:		10/28/96	10/29/96
H2691-1	PIT SMPL.; EMERG. PIT	N/A	136
H2691-2	PIT SMPL.; EMERG. PIT	71	N/A
Quality Control		413	105
True Value QC		400	100
% Accuracy		103	105
Relative Percent Difference		1.8	1.9

METHODS: EPA 600/4-79-02	418.1	325.3
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\_\_\_\_\_  
Chemist

10/29/96  
\_\_\_\_\_  
Date

PLEASE NOTE: **Liability and Damages.** Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. **H2691-XLS** Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



## MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone☐ Personal

Time

4:00 PM

Date

10-15-96

Originating PartyOther Parties

MARK ASHLEY

EDDIE SEAY

Topic

P&amp;S BRINE - EMMICK

Discussion

WAYNE PRICE INFORMED ME OF A PIT AT THE FACILITY  
DURING AN MEET. CONDUCTED ON 9-20-96 THE PIT WAS BENT.  
WE HAVEN'T RECEIVED ANY INFORMATION ABOUT THE CLOSURE.

Conclusions or Agreements

EDDIE WILL CORE THRU PIT + SAMPLE  
FOR CHLORIDES + TPT + SEND RESULTS TO OGD.

Signature

Signed



CC: ROGER ANDERSON  
MARK ASLEY  
JERRY SEXTON

NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

WAYNE PRICE

Date 11-30-95 Miles \_\_\_\_\_ District I  
Time of Return 4 PM Car No. G-04721

Time of Departure 7 AM

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature [Signature]

CHAPARRELL BRINE STATION - BW02

BRINE WATER / OIL BEING DISCHARGED INTO  
UNLINED EARTH PIT.

OIL/WATER EMULSION FROM PUMP IS BEING  
DISCHARGED TO GROUND.

VALVES LEAKING ON TANKS, DRIP PITS OVER-  
FLOWING ONTO GROUND.

TOOK PICTURES (ATTACHED)

Mileage

UIC \_\_\_\_\_  
RFA \_\_\_\_\_  
Other \_\_\_\_\_

Per Diem

UIC \_\_\_\_\_  
RFA \_\_\_\_\_  
Other \_\_\_\_\_

Hours

UIC \_\_\_\_\_  
RFA \_\_\_\_\_  
Other \_\_\_\_\_

TYPE INSPECTION  
PERFORMED

H = Housekeeping  
P = Plugging  
C = Plugging Cleanup  
T = Well Test  
R = Repair/Workover  
F = Waterflow  
M = Mishap or Spill  
W = Water Contamination  
O = Other

INSPECTION  
CLASSIFICATION

U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)  
R = Inspections relating to Reclamation Fund Activity  
O = Other - Inspections not related to injection or The Reclamation Fund  
E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

NATURE OF SPECIFIC WELL  
OR FACILITY INSPECTED

D = Drilling  
P = Production  
I = Injection  
C = Combined prod. inj. operations  
S = SWD  
U = Underground Storage  
G = General Operation  
F = Facility or location  
M = Meeting  
O = Other

**RECEIVED**  
DEC 08 1995

Environmental Bureau  
Oil Conservation Division

STATE OF NEW MEXICO  
NMOCD District I

INTER-OFFICE MEMO

OR CONS  
OIL CONSERVATION DIVISION  
RECEIVED  
DEC 08 1995  
8 AM 8 52

To file: Chaparral Brine St.  
BW-02

Date: Nov. 30, 1995  
Time: 3:00 pm

Telephone call: \_\_\_\_\_ Meeting: \_\_\_\_\_ Other: X On site visit

Person called or attending:  
Wayne Price-NMOCD

REFERENCE: Chaparral Brine St. BW-02

Subject: Site Inspection

Comments:

1. Brine water & oil being discharged into unlined earthen pit.
2. Oil/water emulsion from pump is being discharged to ground.
3. Tank loading valves leaking, drip pots over-flowing onto ground.

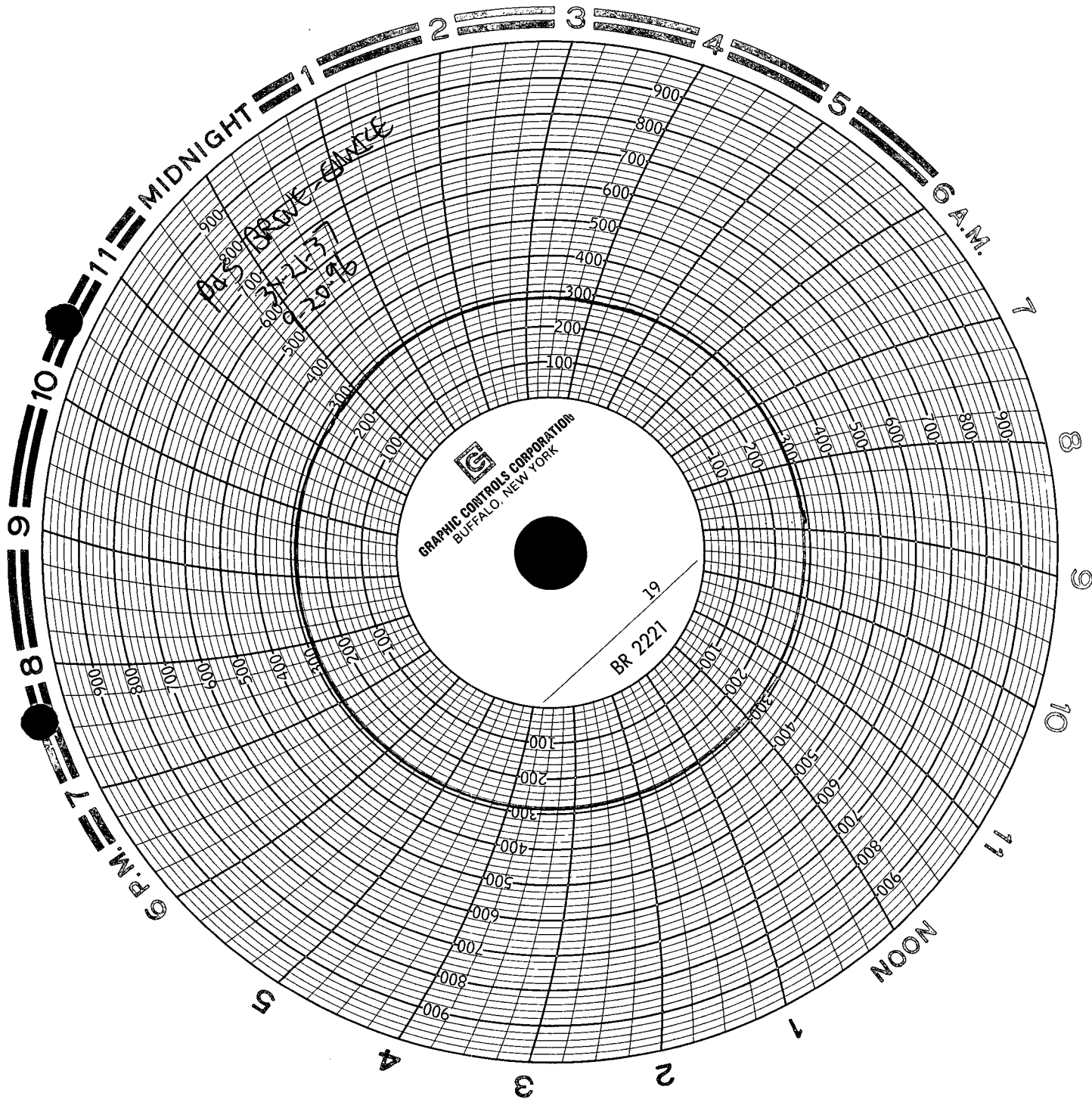
Took the following pictures:

- BW-02 #1. Chaparral station sign does not reflect the legal location. Also shows salt contamination around tank.
- #2. Shows earthen unlined pit with water and oil. Located just west of the pump house.
- #3. Shows three discharge (overflow) lines going to pit.
- #4. Shows brine tank overflow line going to pit area.
- #5. & #6. Drip pots
- #7. Pit showing oil layer on top of water. Picture looking south.
- #8. Buried line (uncovered by Price) discharges lube oil/water emulsion below surface of ground.

Wayne Price   
NMOCD Environmental Engineer-District I

cc: Jerry Sexton-District I Supervisor  
Roger Anderson-Environmental Bureau Chief

attachments-pictures.





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

October 3, 1996

Mr. Paul Prather  
P&S Brine Sales  
P.O. Box 7169  
Eunice, New Mexico 88231

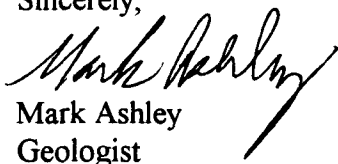
RE: Mechanical Integrity Testing of Brine Supply Wells

Dear Mr. Paul Prather:

Enclosed is a copy of the mechanical integrity test conducted on your brine well. Please retain this copy for your records.

On behalf of the New Mexico Oil Conservation Division, I would like to thank you for your time and cooperation during the testing. If you have any questions, please contact me at (505) 827-7155.

Sincerely,

  
Mark Ashley  
Geologist

Attachment

OIL CONSERVATION DIVISION  
RECEIVED

'89 DEC 21 AM 9 44

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231  
(505) 394-2545

December 19, 1989

Director  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504

Dear Sir:

Your office is in receipt of our one well plugging bond #B02067 issued by Underwriters Indemnity Company which covers our brine station located in Sec. 34, Twp. 21S, Range 37E, Lea County, New Mexico.

We now request that you release the original one well plugging bond with Hartford A & I, Policy #SU4420776, carried with Daniels Insurance of Hobbs. We also ask that you contact the EID and release the trust fund which we set up with First Interstate Bank in Hobbs.

Your prompt attention to this matter will be appreciated.

Yours very truly,

P & S BRINE SALES

*Paul D. Prather*

Paul D. Prather  
President

PDP:js

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

December 6, 1989

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Paul Prather  
P&S BRINE SALES INC.  
P. O. Box 1768  
Eunice, New Mexico 88231

***RE: Delegation of Responsibilities Brine Manufacturing Operations***

*Dear Mr. Prather:*

On June 13, 1989, the Water Quality Control Commission (WQCC) transferred the responsibility for the administration and enforcement of Commission regulations at brine manufacturing operations, including all brine production wells, holding ponds and tanks, from the Environmental Improvement Division (EID) to the Oil Conservation Division (OCD). The OCD has jurisdiction over all manufactured brine once it is transported, used or disposed of off brine plant premises for use in or directly related to oil and gas operations regulated by OCD. OCD regulates brine injection through its Class II Underground Injection Control (UIC) Program if the brine is used in the drilling for or production of oil and gas. EID shall regulate brine injection through its UIC Program if the brine is used for other purposes.

Brine production facilities that were transferred to OCD's jurisdiction must operate pursuant to an approved and current discharge plan. The discharge plan renewal process will be continued by OCD Environmental Bureau Staff. Approximately eight (8) months before the expiration date of an approved discharge plan, the discharger will be notified of the pending expiration of the plan. The discharge plan review process can, depending on circumstances, take several months. If the holder of an approved discharge plan submits a renewal application at least 180 days before discharge plan expiration, and the discharger is in compliance with his approved plan on the date of expiration, then the existing plan will not expire until the renewal application has been approved or disapproved.

Mr. Paul Prather  
December 6, 1989  
Page -2-

Guidelines to aid you in determining what will be required for the renewal of your discharge plan are being prepared. When the guidelines are finalized, they will be supplied to each operator of a brine production facility.

The OCD requires that any person, firm corporation or association that is in ownership of an oil, gas, or service well in the State of New Mexico shall furnish the Division with a surety bond in an amount prescribed in the OCD regulations. The current bond for well less than 5000 feet deep in Chaves, Eddy, Lea and Roosevelt Counties is \$5000. I am enclosing the OCD bond forms for your use. All surety bonds previously submitted to the OCD did not include brine wells. Those surety bonds submitted to the EID must be changed to the OCD. Once the proper bond form are received and approved, all other sureties and bonds can be cancelled.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,



Roger C. Anderson  
Environmental Engineer

RCA/sl

Enclosures

CC: Artesia District Office  
Hobbs District Office

R-3211-D  
JUL 17 1989  
GROUND WATER BUREAU

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

DATE 7/13/89  
REPORT FOR QUARTER ENDING 6/30/89

BARRELS OF FRESH WATER INJECTED 35,531

BARRELS OF BRINE WATER SOLD 35,531

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

Paul Prather  
Paul Prather  
Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker



P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

**R E C E I V E D**

APR 7 1989

DATE 4/6/89

REPORT FOR QUARTER ENDING 03/31/89

GROUND WATER BUREAU

BARRELS OF FRESH WATER INJECTED 51,728

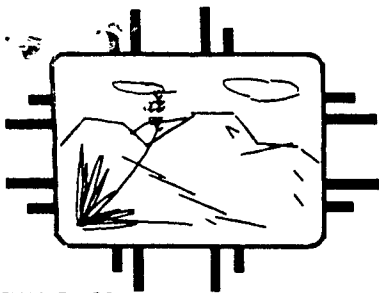
BARRELS OF BRINE WATER SOLD 51,728

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

Paul Prather  
Paul Prather  
Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker



NEW MEXICO  
**HEALTH AND ENVIRONMENT**  
DEPARTMENT

**ENVIRONMENTAL IMPROVEMENT DIVISION**  
**Harold Runnels Bldg.-1190 St. Francis Drive**  
**Santa Fe, New Mexico 87503**

Richard Mitzelfelt  
Director

GARREY CARRUTHERS  
Governor  
CARLA L. MUTH  
Secretary  
MICHAEL J. BURKHART  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 6, 1989

Mr. Paul Prather  
P&S Brine Sales  
P.O. Box 1769  
Eunice, New Mexico 88231

RE: DP-319 Renewal Approval; P&S Brine Sales

Dear Mr. Prather:

The renewal of the discharge plan (DP-319) for P&S Brine Sales brine station located in Eunice in Lea County, New Mexico is hereby approved. The approved discharge plan renewal consists of the materials dated April 13 and 16, 1988, March 7, 1988, August 18, 1988 and December 14, 1988 plus the information and materials submitted as part of the original discharge plan approved December 18, 1982.

The discharge plan renewal application was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109. Please note Subsections 3-109.F., which provide for possible future amendment of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Monitoring and reporting shall be as specified in the discharge plan and supplements thereto. These requirements are summarized on the attached sheet(s). Any inadvertent omissions from this summary of a discharge plan monitoring or reporting requirement shall not relieve you of responsibility for compliance with that requirement.

Mr. Paul Prather

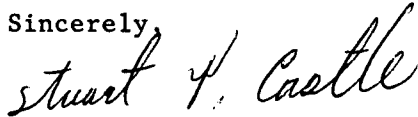
Page 2

January 6, 1989

Pursuant to Subsection 3-109.G.4., this plan renewal is for a period of 5 years. This approval will expire January 6, 1994, and you should submit an application for a new approval in ample time before that date.

On behalf of the staff of the Ground Water Section, I wish to thank you (and your staff) for your cooperation during this discharge plan review.

Sincerely,

A handwritten signature in cursive script that reads "Stuart P. Castle".

Stuart P. Castle  
Bureau Chief  
Ground Water Bureau

SC/JP/mw

cc: Garrison McCaslin, EID District IV Manager, Roswell  
Roelf Ruffner, EID Hobbs Field Office

GROUND WATER SECTION  
Environmental Improvement Division  
Health and Environment Department  
Santa Fe, N.M. 87503  
Phone: (505) 827-2900

## Summary of Discharge Plan

January 5, 1989

DP number: 319      Facility name: P & S BRINE SALES, INC.  
Alternate name:  
Type of facility: MINING - SALT - INSITU  
Means of discharge: INJECTION WELL - STEEL TANKS

County: LEA      EID District 4      T21S, R37E, Sec. 34.000  
Location: .25 MI.N OF GAS PLT S EUNICE      Nearest city: EUNICE

Responsible person:      Contact or consultant person:  
PAUL PRATHER  
Title: OWNER/OPERATOR  
Address: P.O. BOX 1768  
City, zip: EUNICE NM 88231  
Phone: 505-394-2545

The Ground Water Section staff reviewer is JOHN PARKER.  
Application was received 04/13/87 and Public Notice published 05/18/87.  
The plan was approved 12/18/82 and expires 12/18/87.  
(Application for renewal should be submitted in ample time before expiration.)

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## Monitoring Requirements summary

No. of monitoring reports required annually: 4  
Monitoring reports are due no later than October 15, July 15, April 15, and January 15 of each year.

Sampling required	Annual freq.	# of sites	Comments, description
Water levels:	0	0	
Disch. vols:	4	1	VOLUME OF FRESH WATER INJECTED
Major ions:	0	0	
Heavy metals:	0	0	
N Species:	0	0	
Organics:	0	0	
Other:	4	1	VOLUME OF BRINE SOLD

— If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet.  
Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.  
Send monitoring reports to the address at top, "Attention: JOHN PARKER, re: DP-319".

# E I D B U C K S L I P

CHECK ONE:

☒ LETTER TO Paul Prather  
 FOR Stuart P. Castle SIGNATURE

☐ MEMO TO \_\_\_\_\_

☐ PRESS RELEASE

☐ OTHER

SUBJECT: DP-319 Approval; P&S Brine Sales

DRAFTED BY: John Parker 1/6/88  
 (DATE)

CONCURRENCES:

NAME:

NAME:		INITIAL	DATE REC'D	DATE APPROVED
<u>Ernest Rebuck</u>	Prog. Mgr.	<u>ER</u>	<u>1/5</u>	<u>1/5/88</u>
<u>Stuart P. Castle</u>	Bur. Chief	<u>SC</u>		<u>1/6</u>
_____	Deputy Dir.	_____	_____	_____
<u>Jon Thompson</u>	Deputy Dir.	_____	_____	_____
<u>Richard Mitzelfelt</u>	Director	_____	_____	_____
_____	Legal Review	_____	_____	_____
_____	Branch Admin.	_____	_____	_____

cc  
Dist. to  
mmg

FINAL DECISION NEEDED BY \_\_\_\_\_ BECAUSE \_\_\_\_\_  
 (Date)

COMMENTS BY DRAFTER OR REVIEWER(S):

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P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

**R E C E I V E D**  
**JAN 09 1989**  
**GROUND WATER BUREAU**

DATE 1/4/89

REPORT FOR QUARTER ENDING 12/31/88

BARRELS OF FRESH WATER INJECTED 26,033 1/2

BARRELS OF BRINE WATER SOLD 26,033 1/2

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

Paul Prather  
Paul Prather  
Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker



First Interstate Bank  
of Lea County  
Trust Division  
P.O. Box 400  
Hobbs, New Mexico 88240  
505 397-4511

December 12, 1988

Mr. John Parker  
New Mexico Environmental Improvement Division  
P.O. Box 968  
Santa Fe, N.M. 87504

RE: P & S Brine Sales

Dear Mr. Parker:

Enclosed for your records please find a copy of the Trust Agreement dated December 8, 1988 by and between P & S Brine Sales, a partnership and First Interstate Bank of Lea County. P & S Brine Sales has deposited to the trust the amount of \$6,000.00 as required by the Environmental Improvement Division for this trust.

The EID will be provided annual statements for this account as provided in Section 10.

If you have any questions regarding this matter, please do not hesitate to call on me. Thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Kerri Frizzell'.

Kerri Frizzell  
AVP & Trust Officer

kf

encl.

RECEIVED  
DEC 14 1988  
GROUND WATER BUREAU

## TRUST AGREEMENT

Trust Agreement, the "Agreement," entered into as of December 8, 1988, by and between P & S Brine Sales, a partnership, the "Grantor," and First Interstate Bank of Lea County, "a state bank," the "Trustee."

Whereas, the New Mexico Environmental Improvement Division, "EID," an agency of the State of New Mexico, has established certain regulations applicable to the Grantor, requiring that an owner or operator of an injection well shall provide assurance that funds will be available if needed for proper closing, plugging and abandonment of the injection well,

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facility(ies) identified herein,

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

Now, therefore, the Grantor and the Trustee agree as follows:

### Section 1. Definitions. As used in this agreement:

(a) The term "Grantor" means the owner or operator who enters into this agreement and any successors or assigns of the Grantor;

(b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee;

(c) The terms "facility" or "activity" mean any underground injection well or any other facility or activity that is subject to regulation under the Underground Injection Control Program of the New Mexico Environmental Improvement Division, "EID," an agency of the State of New Mexico.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on Attachment A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund," for the benefit of EID. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Attachment B. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibilities for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EID.

Section 4. Payment for Plugging and Abandonment. The Trustee shall make payments from the Fund as the EID Director shall direct, in writing, to provide for the payment of the costs of proper closing, plugging and abandonment of the



injection wells, covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EID Director from the Fund for such expenditures in such amounts as the EID Director shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EID Director specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that

(a) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State Government;

(b) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State Government; and

(c) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

(a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

(b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

(a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee

shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

(b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

(c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

(d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and

(e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the EID Director a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EID Director shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advise of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected to the extent permitted by law, in acting upon the advise of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EID Director, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instruction to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in attachment A or such other designees as the Grantor may designate by amendment to Attachment A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EID Director to the Trustee shall be in writing, signed by the EID Director, or his designee, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instruction. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EID hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EID, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the EID Director, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of non-payment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the EID Director, or by the Trustee and the EID Director if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee and the EID Director, or by the Trustee and the EID Director, if the Grantor ceases to exist. Upon termination of the trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EID Director issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor

or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

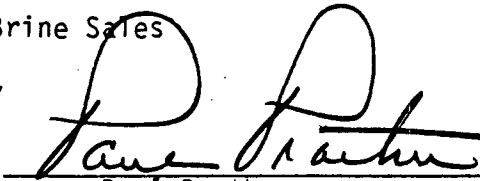
Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of New Mexico.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written.

P & S Brine Sales

By

  
Paul Prather  
General Partner

First Interstate Bank of Lea County

By

  
Kerri Frizzell, AVP & Trust Officer

CERTIFICATE OF ACKNOWLEDGMENT

State of  
New Mexico

County of  
Lea

On this December 8, 1988, before me personally came Paul Prather, to me known, who being by me duly sworn, did depose and say that he resides at Eunice, New Mexico, that he is General Partner of P & S Brine Sales, Partnership described in and which executed the above instrument; that he knows the seal of said partnership; and that he signed his name thereto by like order.

By:

Glenda A. Perry  
Notary Public

My Commission Expires: 8-2-89

ATTACHMENT B

FACILITY

P & S Brine Sales  
P. O. Box 1768  
Eunice, NM 88231

Current Cost Estimate for plugging and abandonment

\$6,000.00

Designated persons:

Steve Prather

Paul Prather, General Partner

ATTACHMENT B

Amount Deposited to Account: \$6,000.00



TRUST DEPARTMENT

72-3127-00-7

225 MSC

TRUST ADMINISTRATOR  
KLF

FIRST INTERSTATE BANK OF LEA COUNTY  
AS TRUSTEE UNDER AGREEMENT FOR P & S  
BRINE SALES, A PARTNERSHIP  
DATED 12/08/88

ASSET & TRANSACTION STATEMENT  
10/08/88 THRU 06/30/89

NEW MEXICO ENVIRONMENTAL IMPROVEMENT  
DIVISION  
ATTN: MR. JOHN PARKER  
P.O. BOX 968  
SANTA FE, NM 87504

100-220171801  
JUL 18 1989  
OIL CONSERVATION DIV.  
SANTA FE



TRUST DEPARTMENT

STATEMENT OF ASSETS

06/30/89

PAGE 1

FACE AMOUNT/  
NO. SHARES

ACCOUNT NO. 72-3127-00-7 P & S BRINE SALES - E.I.D.  
DESCRIPTION

CARRY VALUE

MARKET VALUE

\* CASH AND EQUIVALENTS \*

6,245.58  
FEDERATED TRUST FOR US TREASURY  
OBLIGATIONS FUND # 59

\$6,245.58

\$6,245.58

INCOME CASH

\$245.58

\$245.58

PRINCIPAL CASH

\$245.58-

\$245.58-

\* TOTAL CASH AND EQUIVALENTS \*

\$6,245.58 \*\*

\$6,245.58 \*\*

\*\* TOTAL ASSETS \*\*

\$6,245.58 \*\*

\$6,245.58 \*\*

TRUST DEPARTMENT

PAGE NUMBER 1

STATEMENT OF ACCOUNT

DATE 06/30/89

ACCOUNT NO.  
72-3127-00-7

ACCOUNT NAME P & S BRINE SALES - E.I.D.

ADM. OFFICER KLF

DATE	DESCRIPTION	INCOME CASH	PRINCIPAL CASH	ASSET CARRYING VALUE
10/07/88	BEGINNING BALANCES	.00	.00	.00
12/15/88	DEPOSIT TO TRUST		6,000.00	
01/03/89	INT TO 12/31/88 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	21.82		
02/02/89	INT TO 01/31/89 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	42.85		
02/23/89	NORMAN W HALE TAX PREPARATION: 1988 FED. & N.M. FID. INC. TAX RETURNS P&S BRINE SALE	105.38-		
03/03/89	RECD FROM P & S BRINE SALES 1988 FED & NM FIDUCIARY TAX RETURNS	105.35		
04/04/89	INT TO 02/28/89 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	40.00		
04/10/89	INT TO 03/31/89 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59 REC FROM P&S BRINE SALES TRUST FEE 1-1-89 TO 3-31-89	46.71   131.70		

TRUST DEPARTMENT

PAGE NUMBER 2

STATEMENT OF ACCOUNT

DATE 06/30/89

ACCOUNT NO.  
 72-3127-00-7

ACCOUNT NAME P & S BRINE SALES - E.I.D.

ADM. OFFICER KLF

INCOME  
 CASH

PRINCIPAL  
 CASH

ASSET CARRYING  
 VALUE

DATE	DESCRIPTION	INCOME CASH	PRINCIPAL CASH	ASSET CARRYING VALUE
04/10/89	FIRST INTERSTATE BANK OF LEA COUNTY FEE FOR PERIOD ENDED 04/30/89 TRUST FEE 1-1-89 TO 3-31-89	131.70-		
05/02/89	INT TO 04/30/89 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	45.95		
06/05/89	INT TO 05/31/89 FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	48.28		
06/16/89	CHECK RECD FROM P & S BRINE SALES FOR TRUSTEE FEE 4/1/89 THRU 6/30/89	134.41		
06/30/89	FIRST INTERSTATE BANK OF LEA COUNTY FEE FOR TRUSTEE FEE 04/01/89 THRU 06/30/89	184.41-		
	SALES (1) 10/08/88 TO 06/30/89 FEDERATED TRUST FOR US TREASURY		-03	-03-
	PURCHASES (7) 10/08/88 TO 06/30/89 FEDERATED TRUST FOR US TREASURY		6,245.61-	6,245.61
	** ENDING BALANCES *	245.58	245.58-	6,245.58

TRUST DEPARTMENT

PAGE NUMBER 3

STATEMENT OF ACCOUNT

DATE 06/30/89

ACCOUNT NO.  
72-3127-00-7

ACCOUNT NAME P & S BRINE SALES - E.I.D.

ADM. OFFICER KLF

DATE DESCRIPTION

INCOME  
CASH

PRINCIPAL  
CASH

ASSET CARRYING  
VALUE

STATEMENT SUMMARY

BEGINNING BALANCES	.00	.00	.00
TOTAL RECEIPTS	667.07	6,000.03	6,245.61
TOTAL DISBURSEMENTS	421.49-	6,245.61-	.03-
ENDING BALANCE	245.58	245.58-	6,245.58

P & S BRINE SALES  
P. O. Box 1768  
Eunice, N.M. 88231  
(505) 394-2545

RECEIVED

JUN 15 1989

OIL CONSERVATION DIV.  
SANTA FE

June 14, 1989

Mr. Dave Boyer  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504

Dear Mr. Boyer:

We presently have a trust fund set up with First Interstate Bank, P. O. Box 400, Trust Division, Hobbs, New Mexico 88240, which we set up to satisfy the requirements of the EID when they were put in control of the brine wells.

I spoke with Jerry Sexton in your Hobbs office this morning and he advised that I should contact you and ask that you take the steps necessary to have this trust fund released since we already have a plugging bond for the Oil Conservation Division.

I had talked earlier with John Parker with the EID and he advised that the OCD would have to contact him in order to get this trust fund released.

Should it be necessary for us to do something else, please let us know and we will take whatever steps you advise.

Yours very truly,

P & S BRINE SALES

*Paul Prather*

Paul Prather  
Owner

cc: Mr. Jerry Sexton  
Oil Conservation Division  
P. O. Box 1980  
Hobbs, New Mexico 88240

*New Bond  
in place  
12-28-89  
EID started no longer  
repair work 12/28/89*

Revised - -

STATE OF NEW MEXICO

\$50,000.00 BLANKET PLUGGING BOND

BOND NO. \_\_\_\_\_

(For Use of Surety Company)

File with Oil Conservation Division, P.O.Box 2088, Santa Fe 87501

KNOW ALL MEN BY THESE PRESENTS:

That \_\_\_\_\_, (An individual) (a partnership) (a corporation organized in the State of \_\_\_\_\_, with its principal office in the city of \_\_\_\_\_, State of \_\_\_\_\_, and authorized to do business in the State of New Mexico), as PRINCIPAL, and \_\_\_\_\_, a corporation organized and existing under the laws of the State of \_\_\_\_\_, and authorized to do business in the State of New Mexico, as SURETY, are held firmly bound unto the State of New Mexico, for the use and benefit of the Oil Conservation Division of New Mexico pursuant to Section 65-3-11, New Mexico Statutes Annotated, 1953 Compilation, as amended, in the sum of Fifty Thousand Dollars (\$50,000.00) lawful money of the United States, for the payment of which, well and truly to be made, said PRINCIPAL and SURETY hereby bind themselves, their successors and assigns, jointly and severally, firmly by these presents.

The conditions of this obligation are such that:

WHEREAS, The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases with the State of New Mexico; and

*↳ OR brine mineral leases*

WHEREAS, The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals; and

*↳ OR brine mineral leases*

*OR brine minerals*

WHEREAS, The above principal, individually, or in association with one or more other parties, has commenced or may commence the drilling of wells to prospect for and produce oil or gas, or carbon dioxide (CO<sub>2</sub>) gas or helium gas, or does own or may acquire, own or operate such well, or such wells started by others on land embraced in said State oil and gas leases, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases, and on land patented by the United States of America to private individuals, and on land otherwise owned by private individuals, the identification and location of said well being expressly waived by both principal and surety.



TRUST DEPARTMENT

RECEIVED  
JAN 19 1989  
GROUND WATER BUREAU

72-3127-00-7

225 MSC

TRUST ADMINISTRATOR  
KLF

FIRST INTERSTATE BANK OF LEA COUNTY  
AS TRUSTEE UNDER AGREEMENT FOR P & S  
BRINE SALES, A PARTNERSHIP

ASSET & TRANSACTION STATEMENT  
10/03/88 THRU 12/31/88

NEW MEXICO ENVIRONMENTAL IMPROVEMENT  
DIVISION  
ATTN: MR. JOHN PARKER  
P.O. BOX 968  
SANTA FE, NM 87504

TRUST DEPARTMENT

STATEMENT OF ASSETS

12/31/88

PAGE 1

ACCOUNT NO. 72-3127-00-7 P & S BRINE SALES - E.I.D.

FACE AMOUNT/ NO. SHARES	DESCRIPTION	CARRY VALUE	MARKET VALUE
* CASH AND EQUIVALENTS *			
6,000	FEDERATED TRUST FOR US TREASURY OBLIGATIONS FUND # 59	\$6,000.00	\$6,000.00
** TOTAL ASSETS **		\$6,000.00 **	\$6,000.00 **



TRUST DEPARTMENT

PAGE NUMBER 1

STATEMENT OF ACCOUNT

DATE 12/31/88

ACCOUNT NO.  
72-3127-00-7

ACCOUNT NAME P & S BRINE SALES - E.I.D.

ADM. OFFICER KLF

DATE

DESCRIPTION

INCOME  
CASH

PRINCIPAL  
CASH

ASSET CARRYING  
VALUE

10/07/88

BEGINNING BALANCES

.00

.00

.00

12/15/88

DEPOSIT TO TRUST

6,000.00

12/31/88

PURCHASES (1) 10/08/88 TO 12/31/88  
FEDERATED TRUST FOR US TREASURY

6,000.00-

6,000.00

\*\* ENDING BALANCES \*

.00

.00

6,000.00

STATEMENT SUMMARY

BEGINNING BALANCES

.00

.00

.00

TOTAL RECEIPTS

.00

6,000.00

6,000.00

TOTAL DISBURSEMENTS

.00

6,000.00-

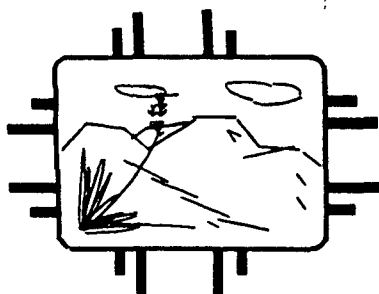
.00

ENDING BALANCE

.00

.00

6,000.00



NEW MEXICO  
**HEALTH AND ENVIRONMENT**  
DEPARTMENT

**ENVIRONMENTAL IMPROVEMENT DIVISION**  
**Harold Runnels Bldg.-1190 St. Francis Drive**  
**Santa Fe, New Mexico 87503**

Richard Mitzelfelt  
Director

GARREY CARRUTHERS

Governor

CARLA L. MUTH

Secretary

MICHAEL J. BURKHART

Deputy Secretary

December 22, 1988

Mr. Paul D. Prather, Owner  
P&S Brine Sales  
P.O. Box 1769  
Eunice, New Mexico 88231

Dear Mr. Prather:

The Underground Injection Control staff of the New Mexico Environmental Improvement Division Ground Water Section would like to thank you for your cooperation during our recent inspection of P&S Brine Sales brine facility. A copy of the inspection forms is attached for your reference. No violations were noted during the inspection.

Thank you for your continued cooperation. Should you have any questions feel free to contact me (827-2902) or John Parker (827-0027).

Sincerely,

Kevin Lambert  
Hydrologist  
Ground Water Section - UIC Program

KL/JP/mw

cc: Roelf Ruffner, EID Hobbs Field Office

Enclosure

ON REQUIRED				
#	#	#	#	#
318	323	354	370	298
319	324	355	371	426
320	325	360	372	
321	326	361	394	
322	351	369	401	

## BRINE STATION INSPECTION FORM

1413

DATE 12/7 1988 EID INSPECTOR Lambert  
FACILITY P & S Brine Sales LOCATION Eunice  
FACILITY REP ON SITE Steve Prather COUNTY Lea

WELL OPERATION

Valved for reversal to control salt buildup  
WELL IS INJECTING: ☒ THROUGH ANNULUS ☐ THROUGH TUBING  
SOURCE OF FRESH WATER City Water  
TRACE INJECTION/PRODUCTION LINES Surface lines look good  
WELL HEAD PRESSURE \_\_\_\_\_ PSIG PUMP PRESSURE \_\_\_\_\_ PSIG  
LEAKS AROUND WELL OR PUMP None

Looks good small fresh

STORAGE AREA

FOR PONDS:

GENERAL LINER APPEARANCE \_\_\_\_\_

AMOUNT OF FREEBOARD \_\_\_\_\_

ANY SIGN OF OVERFLOW OR LEAKS \_\_\_\_\_

LEAK DETECTION SYSTEM ☐ FLUIDS ☐ DRY

FOR TANKS: 4 tanks ~~3~~ brine South 1 fresh North  
GENERAL APPEARANCE In Good Shape

LABELED PLAINLY ☒ YES ☐ NOBERMED TO PREVENT RUNOFF ☒ YES ☐ NO

CHECK CONTENTS TO ASSURE PROPER FLUID/LABLE MATCH \_\_\_\_\_

NUMBER OF TANKS FOR BRINE 3 FRESH WATER 1LOADING AREA

PROPERLY GRADED AND BERMED TO CONTAIN SPILLAGE ☒ YES ☐ NO  
ANY EVIDENCE OF RECENT SPILLAGE ☒ YES ☐ NO  
DOES FACILITY HAVE A SPILL COLLECTION SYSTEM ☒ YES ☐ NO  
ANY EVIDENCE OF OIL SPILLING/DUMPING ☐ YES ☒ NO

MONITORING WELLS

general area in good shape  
collection system approaching capacity  
needs to be cleaned out  
DEPTH \_\_\_\_\_ FT STATIC WATER LEVEL \_\_\_\_\_ FT BELOW CASING  
SAMPLED THIS VISIT ☐ YES ☐ NO TEMP \_\_\_\_\_ Ec \_\_\_\_\_

COMMENTS Looks Good No problems

Clean Operation Do not have much business

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

**R E C E I V E D**  
OCT 12 1988  
GROUND WATER BUREAU

DATE 10/7/88

REPORT FOR QUARTER ENDING 9/30/88

BARRELS OF FRESH WATER INJECTED 41,923

BARRELS OF BRINE WATER SOLD 41,923

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

Paul Prather

Paul Prather

Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker

**R E C E I V E D**  
**SEP 26 1988**  
**GROUND WATER BUREAU**

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

September 22, 1988

Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: Mr. John Parker

Dear Mr. Parker:


Attached please find the "Financial Test for Self Insurance" which you requested in your letter of September 1, 1988.

You asked in item #1 that we obtain a plugging bond in the amount of \$5,810.20 instead of the \$5,000.00 bond which we have. We have been in contact with our insurance carrier, Daniels Insurance of Hobbs and they have advised that they are unable to obtain a plugging bond for more than \$5,000.00 which is the maximum allowed.

We want very much to comply with your requests and should you have another avenue that we might pursue, please advise.

Yours very truly,

P & S BRINE SALES



Paul D. Prather

PDP:js  
Enc/1

Financial Test for Self Insurance


I, Paul Prather, part owner of P. & S. Brine Sales, hereby submit this letter in support of the use of the financial test of self insurance to demonstrate financial responsibility in the amount of at least \$35,000.00 for undertaking a hydrogeologic investigation for ground water contamination, caused by sudden and/or nonsudden accidental releases, arising from operating the P. & S. Brine Station located in Section 34, Township 21 South, Range 37 East, Lea County, New Mexico.

I, Paul Prather, and Bessie Prather have not received an adverse opinion or a disclaimer of opinion from an independent auditor on our financial statements for the latest completed fiscal year.


[Fill in the following information. Tangible net worth is to be derived from the year-end financial statements of Paul D. and Bessie Prather for the latest completed fiscal year.]

1. Amount of action(s) (hydrogeological investigations) to be covered by the financial test . . . \$35,000.00
2. Tangible net worth..... 2,143,000<sup>00</sup>
3. Is line 2 at least 12 times line 3? YES (yes or no)

SIGNATURES:

  
Paul Prather

9/22/88  
Date

  
Bessie Prather

9-22-88  
Date

☒ Telephone☐ Personal

Time

8:45

Date

9/26/88

Originating Party

John W Parker  
WRS II

Other Parties

Steve Prather  
Son of Owner

Subject

Possible leak from P&S Brine Scales  
Brine Facility

Discussion

Steve informed me that he had driven by and noticed the leak of fresh water from his fresh water tank overflow, first thing this morning - and that he was undertaking measures to repair the culprit valve this morning.

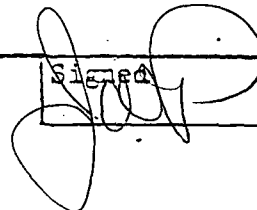
Conclusions or Agreements

I thanked him for the info and asked for him to call should there be further difficulties

Distribution

File

Signed





## MEMORANDUM OF MEETING OR CONVERSATION

<input type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 8:51am	Date 9/26/88
Originating Party Kevin Lambert		Other Parties Roelf Ruffner <del>Joe Landis</del>	
Subject P & S <del>Brine</del> Brine Sales overflow - <del>to</del> flowing to collection tank and beyond			
Discussion complaint Joe Landis 394- <del>3075</del> 3075			
Conclusions or Agreements I called Koffe back after speaking with Steve Prather of P & S and told him that it was fresh water that was spilled - he said they would go by and call us back.			
Distribution file		Signed RHL JRP	

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 2:00 PM	Date 9/20/88
Originating Party John Parker WRS II		Other Parties Joyce (Dink Prather's Secretary)
Subject DP-319 Renewal		

## Discussion

I asked if they had received my Sept. 1 letter. She said yes, but before she prepared a response, she was waiting to hear from her insurance co. They had indicated up front that there would probably be considerable difficulty getting a band for this purpose.

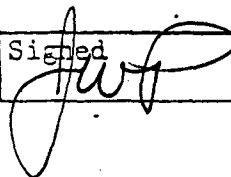
## Conclusions or Agreements

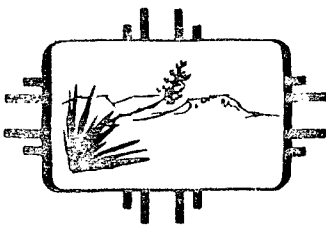
I asked Joyce to call me once she's heard from the insurance co., or have the ins. co call me directly.

## Distribution

File

Signed





NEW MEXICO  
HEALTH AND ENVIRONMENT  
DEPARTMENT

Post Office Box 968  
Santa Fe, New Mexico 87504-0968

ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhardt  
Director

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 1, 1988

Paul D. Prather  
P. & S. Brine Sales  
P.O. Drawer 1769  
Eunice, NM 88231


Dear Mr. Prather:

The New Mexico Environmental Improvement Division Ground Water Section is in receipt of your response to my July 26, 1988 letter to you. The following two items must be addressed prior to renewal of DP-319.

1. The plugging and abandonment plan submitted appears to comply with all the applicable regulatory requirements. However, based on my analysis, the well, having a 7" casing 1489 feet deep, will require approximately 300 sacks of cement, an additional 50 sacks to the 250 sacks of cement you listed in your plan. This would require an additional \$400.00 based on the February 25, 1988 proposal by Halliburton submitted by P.&S. This brings the total amount of the costs for plugging and abandonment to: \$5,810.20. You should use the forms I provided you in my July 26, 1988 correspondence to obtain financial assurance(s) to cover this amount.
2. Evaluation of the financial statements provided reveals that you have sufficient funds available to allow for self insurance. If you will complete and return the enclosed "Letter From Chief Financial Officer", the requirements for financial assurance for a hydrogeological investigation will have been met.

Thank you for your continued cooperation. Should you have any questions you may call me at (505) 827-0027.

Sincerely,

  
John W. Parker  
Water Resource Specialist  
Ground Water Section

JWP:dg  
attachments

Financial Test for Self Insurance

I, Paul Prather, part owner of P. & S. Brine Sales, hereby submit this letter in support of the use of the financial test of self insurance to demonstrate financial responsibility in the amount of at least \$35,000.00 for undertaking a hydrogeologic investigation for ground water contamination, caused by sudden and/or nonsudden accidental releases, arising from operating the P. & S. Brine Station located in Section 34, Township 21 South, Range 37 East, Lea County, New Mexico.

I, Paul Prather, and Bessie Prather have not received an adverse opinion or a disclaimer of opinion from an independent auditor on our financial statements for the latest completed fiscal year.

[Fill in the following information. Tangible net worth is to be derived from the year-end financial statements of Paul D. and Bessie Prather for the latest completed fiscal year.]

1. Amount of action(s) (hydrogeological investigations) to be covered by the financial test . . . \$35,000.00
2. Tangible net worth..... \_\_\_\_\_
3. Is line 2 at least 12 times line 3? \_\_\_\_\_ (yes or no)

SIGNATURES;

\_\_\_\_\_  
Paul Prather

\_\_\_\_\_  
Date

\_\_\_\_\_  
Bessie Prather

\_\_\_\_\_  
Date

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231  
505-394-2545

August 17, 1988

Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

RECEIVED  
AUG 18 1988  
GROUND WATER BUREAU

Attention: Mr. John Parker

Dear Mr. Parker:

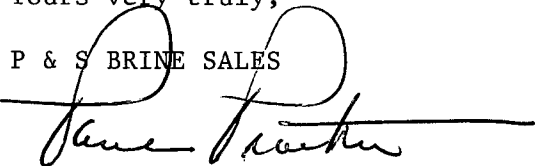
Attached please find the items which you requested in your letter of July 26, 1988.

Please note that on Item #3 I have attached my personal financial statement as assurance to the EID that I am financially able to cover the cost of a hydrogeological investigation.

Should you need further information, please advise.

Yours very truly,

P & S BRINE SALES



Paul D. Prather

PDP:js  
Enc/3

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231  
505-394-2545

Item #1:

APPROVAL PLAN TO PLUG P & S BRINE SALES IF AND WHEN NEEDED:

1. Rig up unit.
2. Set well head off.
3. Pull 2 7/8" tubing out of hole and lay down.
4. Run cast iron bridge plug to bottom of casing.
5. Halliburton pump 250 sacks class "C" cement from bottom plug to top of surface.
6. Rig down unit.
7. Weld cap on 7" casing and put up dry hole marker, cut off dead men.
8. Remove tanks, pump and restore land to original.

COST:

1. Pulling unit	8 Hrs. @ \$88.65 P/Hr.	\$ 709.20
2. Magnesium bridge plug		1,321.00
3. Pump truck w/250 sacks cement		3,050.00
4. Welder & materials @ \$28.50 P/Hr. + materials		230.00
5. Move tank (No cost, will use own equipment)		-0-
		<u>\$5,310.20</u> Total Cost

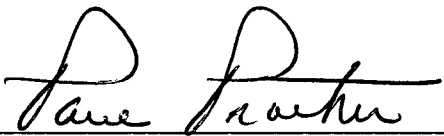
my HP program  
shows that 300+  
sacks cement would be  
necessary to plug  
this well. - add 400.00 to  
estimate

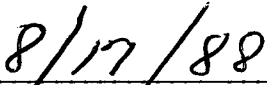
Jeff

8/23/88

PAUL D. PRATHER  
JULY 26, 1988  
Page 3.

I certify under penalty of law that I have personally examined and am familiar with the information submitted to EID by P&S Brine sales in documents dated April 13, 1987 and February 23, 1988, and all attachments thereto, and that, based on my inquiring of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Date

JP:mc

PAUL D. AND BESSIE PRATHER

EUNICE, NEW MEXICO

FINANCIAL STATEMENTS

FEBRUARY 1, 1988



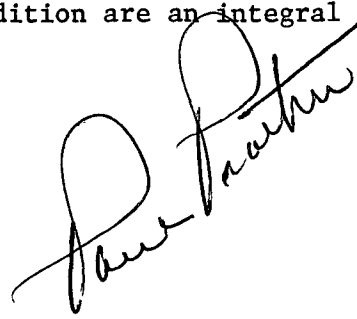
Paul D. and Bessie Prather  
Eunice, New Mexico  
Statement of Financial Condition  
February 1, 1988  
[Not Verified by Audit]

---

Assets:

Cash in Bank	8,000.00
Certificates of Deposit	220,000.00
Individual Retirement Accounts-Horace Mann	50,000.00
Cash Value of Life Insurance	30,000.00
Investments:	
Commercial Rent Property, Eunice, NM	187,500.00
Chaparral Salt Water Disposal	225,000.00
Stock-Chaparral Service, Inc.	800,000.00
P & S Brine Sales-Partnership	100,000.00
Yarbrough Oil Company #1	40,000.00
Minerals-Enron	20,000.00
Residence and Furnishings, Eunice, NM	90,000.00
Residence and Furnishings, Ruidoso, NM	225,000.00
Trailer House, Eunice, NM	16,000.00
Farm and Livestock, Hobbs, NM	90,000.00
Jewelry and Guns	32,000.00
1951 Ford Pickup	2,500.00
1983 Jeep Waggoner	7,000.00
Total Assets	<u>2,143,000.00</u>
<u>Liabilities:</u>	
Notes and Mortgages Payable	392,371.21
Net Worth	<u>1,750,628.79</u>
Total Liabilities and Net Worth	<u>2,143,000.00</u>

The notes to the Statement of Financial Condition are an integral part of this statement.



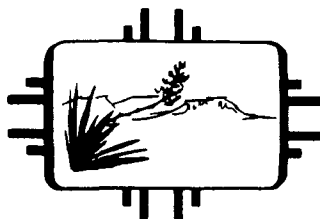
Paul D. and Bessie Prather  
Eunice, New Mexico  
Schedule of Notes Payable  
February 1, 1988  
[Not Verified by Audit]

---

First Interstate Bank - Loan on Commercial Land and Building	
Monthly payments of \$2,369.10 includes interest	53,358.45
First Interstate Mortgage Co. - Loan on residence, Eunice-monthly	
payments of \$500.00 includes interest	25,000.00
First Interstate Bank - Loan on Trailer House, Eunice-monthly	
payments of \$300.00 includes interest	21,000.00
First Suburban Mortgage Co. - Loan on Ruidoso residence-monthly	
payments of \$1,328.00 includes interest	140,000.00
Chaparral Service, Inc. - Demand Loan, No collateral	<u>153,012.76</u>
Total Notes	<u>392,371.21</u>

The above note balances were provided by Paul D. Prather.

The notes to the Statement of Financial Condition are an integral part of this Statement.



NEW MEXICO  
HEALTH AND ENVIRONMENT  
DEPARTMENT

Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS  
Governor  
LARRY GORDON  
Secretary  
CARLA L. MUTH  
Deputy Secretary

July 26, 1988

*Certified Mail - Return Receipt Requested*

Paul D. Prather  
P.O. Box 1769  
Eunice, NM 88231

Dear Mr. Prather:

The New Mexico Environmental Improvement Division (EID) has completed review of your submittal, received on March 7, 1988, toward renewal of DP-319. The following comments and additional information requests need to be addressed before further action can be taken on your application for discharge plan renewal.

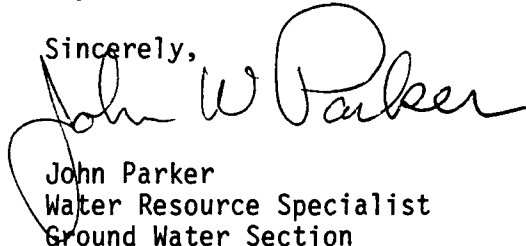
1. Your response to Item #9 of EID's November 25, 1987 letter is not consistent with the attached bid by Halliburton for plugging and abandonment. You stated that P & S will set a plug at the "bottom of the casing and fill the casing from top to bottom with cement." The estimate provided by Halliburton involves setting of 100 foot cement plugs at 1200' and at the surface, with the intervening casing filled with circulated mud. EID has reviewed information on the Eunice area which indicates the presence of water-bearing sands at 230'-240' below the surface. Hence any plugging and abandonment plan submitted by P&S should at least incorporate a 100 foot cement plug at the surface, and a 100 foot plug straddling the aquifer, in addition to a 100 foot plug at the top of the salt formation. (Your proposal to fill the casing from top to bottom would also be acceptable.) The itemized costs for plugging and abandonment should include the costs of a cast-iron bridge plug (Approximately \$1,500) for each cement plug planned; and the cost for having an oil field service unit on site to pull the tubing. The plan should also include setting of a surface P&A marker with the associated costs.
2. Please sign the attached document which sites all submittals to date in support of DP-319 renewal, and the required certification from Section 5-101.H.1. and 2. of the New Mexico Water Quality Control Commission (WQCC) Regulations.
3. EID is requiring all brine facilities, as they come up for renewal, to have in place financial assurance to cover the costs of a hydrogeological investigation. This requirement, pursuant to Section 5-210.B.17. of the WQCC Regulations, is being imposed to cover the costs of a hydrogeological investigation should an operator abandon a brine facility when there has been a history of non-compliance or other evidence indicating the possibility of ground water contamination. EID has developed a detailed cost estimate for such an investigation which totals \$35,000.00. Please use one of the attached forms to acquire financial assurance for this purpose. The attached forms are as follows:

PAUL D. PRATHER  
JULY 26, 1988  
Page 2.

1. Financial Guarantee Bond (note: a trust agreement must also be submitted if this bond is used);
2. Performance Bond (note: a trust agreement must also be submitted if this bond is used);
3. Trust Agreement; or
4. Irrevocable Standby Letter of Credit (note: there are additional requirements if this form is used);

Thank you in advance for your cooperation. Should you have any questions you may reach me at 827-0027.

Sincerely,



John Parker  
Water Resource Specialist  
Ground Water Section

JP:mc

Enclosure

cc: Roelf Ruffner, Hobbs EID  
Tom Burt, Carlsbad EID

PAUL D. PRATHER  
JULY 26, 1988  
Page 3.

I certify under penalty of law that I have personally examined and am familiar with the information submitted to EID by P&S Brine sales in documents dated April 13, 1987 and February 23, 1988, and all attachments thereto, and that, based on my inquiring of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

JP:mc

**R E C E I V E D**  
JUN 15 1988

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

GROUND WATER BUREAU

DATE 7/13/88

REPORT FOR QUARTER ENDING 6/30/88

BARRELS OF FRESH WATER INJECTED 42,470 1/2

BARRELS OF BRINE WATER SOLD 42,470 1/2

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

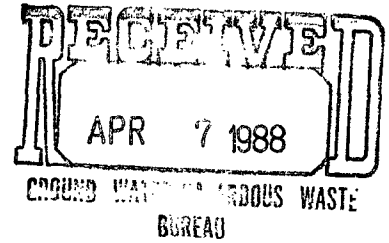
Paul Prather  
Paul Prather  
Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545



DATE 4/5/88

REPORT FOR QUARTER ENDING 3/31/88

BARRELS OF FRESH WATER INJECTED 83,210

BARRELS OF BRINE WATER SOLD 83,210

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

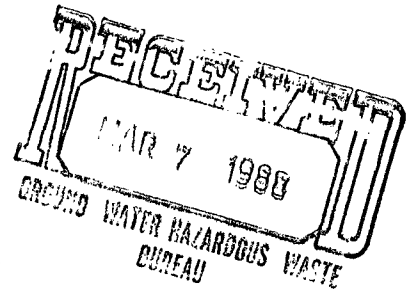
Paul Prather  
Paul Prather  
Partner

To: Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: John Parker

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545



February 23, 1988

Environmental Improvement Division  
Ground Water Section  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968


Gentlemen:

Attached please find the items which you requested in your letter of November 25, 1987.

If we can be of further assistance, please advise.

Yours very truly,

P & S BRINE SALES



Paul D. Prather  
Partner

PDP:js  
Enc.



Item #1:

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

DISCHARGE PLAN:

This brine well operates by pumping fresh water down the casing and back out the tubing. This way no salt is ever in the casing and therefore cannot get back into the fresh water formations.

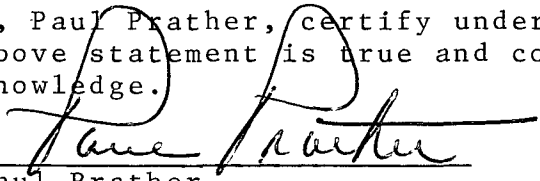
This well was drilled by Baber Drilling Company with a rotary rig.

P & S Brine Sales purchases its fresh water from the City of Eunice and stores same in a 1,000 barrel tank on location.

When fresh water is pumped down the casing into the salt section, it washes out the brine water and pumps it to the surface. Once on the surface this brine water is stored in three (3) 1,000 barrel tanks.

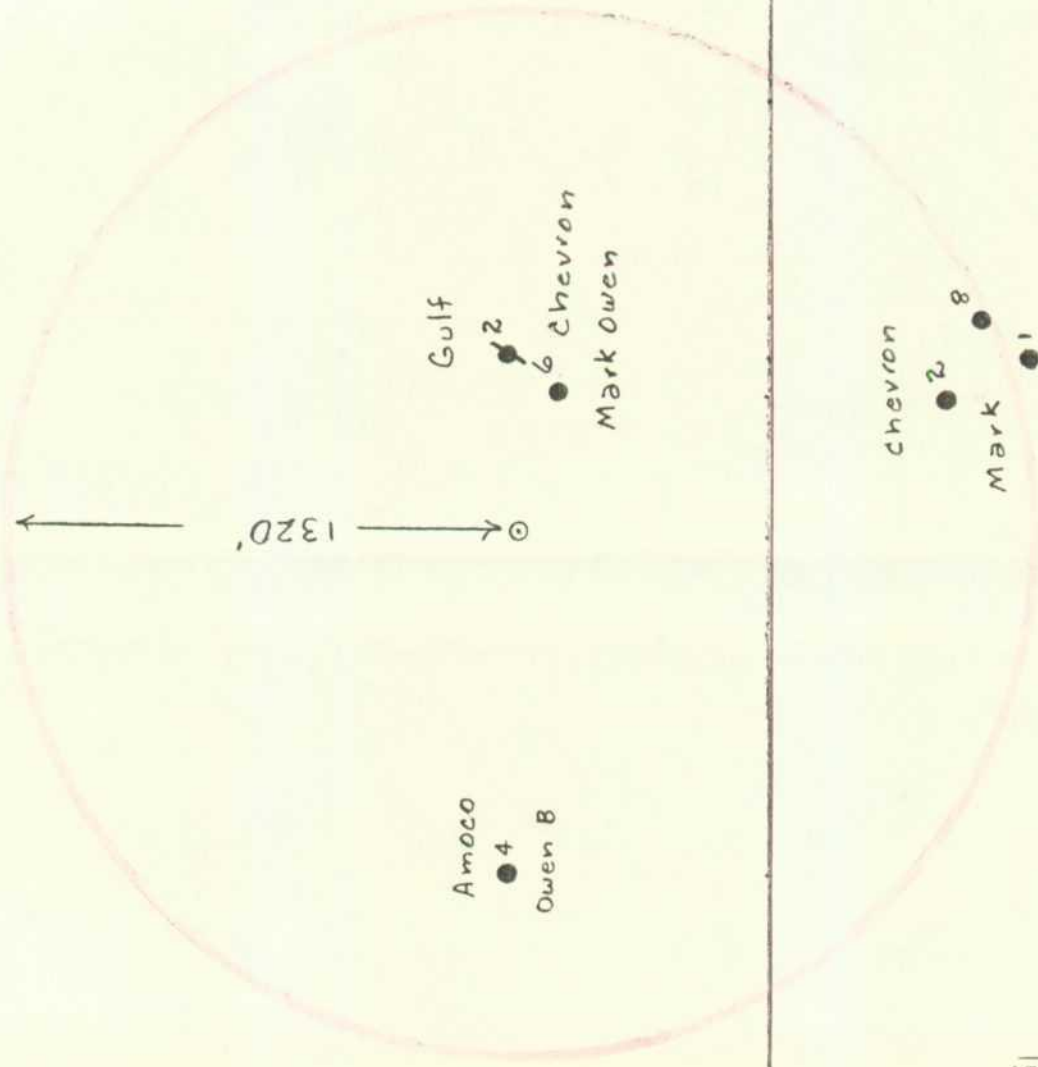
In order to keep any brine water from going back into the ground, we have a small working pit and have our own vacuum truck to pick up this water and put it back into the storage tanks.

I, Paul Prather, certify under penalty of law that the above statement is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
Paul Prather  
Partner

December 2, 1987

R 37E



T  
21  
S

34 35  
3 2

T  
22  
S

P 4 S Brine Sales  
Eunice No. 1

Scale: 1" = 500'

Item #2:

## COMPLETION AND OR PLUGGING DATA

All Wells within 1320' of

Item: #3

P &amp; S Brine Sales - Eunice No. 1

630' FSL &amp; 2427' FEL Sec. 34, T21S, R37E

Amoco Production Company - Owen B No. 4

660' FSL &amp; 1980' FWL of Sec. 34, T21S, R37E

Spud 3/9/40; Complete 4/21/40; Orig. TD 3755 ✓

15 1/2" csg @ 122' w/200 sx cmt 1005X? →

*Original Completion Report  
4/23/40*

7" csg @ 3568' w/250 sx cmt ✓

1/6/47 Deepen to 6599, dual Blinebry &amp; Drinkard ✓

5" csg @ 6599 w/160 sx cmt ✓

Drinkard perfs 6520-6564; Blinebry perfs 5538-6003 ✓

Current Allowable: Blinebry 29 BOPD

Drinkard Shut In

Gulf Oil Corporation - Mark Owen No. 2

660' FSL &amp; 1980' FWL of Sec. 34, T21S, R37E

Spud 5/5/40; Complete 6/1/40; TD 3740 ✓

9 5/8" csg @ 251' w/200 sx cmt ✓

6" csg @ 3575 w/300 sx cmt ✓

Complete open hole 3575-- 3740 ✓

6/25/55 Squeeze leak in 6" csg @ 530' w/300 sx cmt ✓

P &amp; A 10/1/76. Set CIBP @ 3500 &amp; cap w/79' cmt.

Found holes in 6" csg @ 630' &amp; 844'; set cmt ret @ 715' ✓

&amp; pump 90 sx cmt thru hole @ 844' &amp; cure out @ 620". ✓

Dump 215' cmt on ret, spot 60' cmt plug @ surface. ✓

*620'*

Chavron USA, Inc. - Mark Owen No. 6

554' FSL &amp; 2086' FEL of Sec. 34, T21S, R37E

Spud 9/24/47; Complete 11/20/47, TD 6552 ✓

13 3/8" csg @ 309' w/300 sx cmt ✓

9 5/8" csg @ 2900 w/1300 sx cmt ✓

7" csg @ 6475 w/700 sx cmt ✓

Orig. completion Drinkard, open hole 6475-6552 ✓

4/20/54 Dual Drinkard with Blinebry perfs 5620-5700 ✓

10/19/73 Abandon Drinkard &amp; Blinebry. Set CIBP @ 6400 ✓

&amp; cap w/3 sx cmt, set CIBP @ 5450 &amp; cap with 3 sx cmt ✓

Perf Paddock 5148-5161

*5148 - 5153 5161-5166*

3/11/75 Squeeze Paddock perfs w/170 sx cmt &amp; squeeze ✓

Blinebry perfs w/200 sx cmt. Clean out to 6489, perf ✓

Drinkard 6352-6468 ✓

4/5/83 Set ret BP @ 5250 &amp; cap w/10' sand. Set cmt ret ✓

@ 5437 &amp; resqueeze Blinebry perfs w/75 sx cmt. Perf ✓

2780 &amp; squeeze w/210 sx; perf 1230 &amp; squeeze w/1900 sx. ✓

Pull ret BP, now Drinkard gas well. ✓

*? completed  
records  
show proposed*

Chevron USA, Inc - Mark No. 2

454' FNL &amp; 2086' FEL of Sec. 3, T22S, R37E

Spud 10/19/46; Complete 12/11/46; TD 6554 ✓

13 3/8" csg @ 294' w/300 sx cmt ✓

9 5/8" csg @ 2906' w/1300 sx cmt ✓

7" csg @ 6483' w/700 sx cmt ✓

Orig. completion Drinkard, open hole 6483-6554 ✓

8/6/74 Set CIBP @ 6475 &amp; cap w/6' cmt to abandon open hole ✓

Perf Drinkard 6309-6434. Now Drinkard gas well. ✓

*OK*

Chevron USA, Inc. - Mark No. 8

554' FNL &amp; 1874' FEL of Sec. 3, T22S, R37E

Spud 3/31/49; Complete 4/30/49; TD 5255 ✓

13 3/8" csg @ 304 w/300 sx cmt ✓

9 5/8" csg @ 2900' w/1300 sx cmt ✓

7" csg @ 5290 w/500 sx cmt ✓

Orig. completion Paddock, perfs 5115-5195 ✓

6/19/79 Squeeze Paddock pefs w/150 sx cmt ✓

Deepen to 7639, set 7" liner 4992-7637 w/450 sx cmt ✓

Perf Wantz Grinte Wash 7284-7568 ✓

11/2/83 Set CIBP @ 7278 &amp; cap w/35 sx cmt ✓

Perf Wantz Abo 6576-7233. Current allowable 2 BOPD ✓

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

Item #4:

We wish to restate the second paragraph of our letter dated April 14, 1987 to read as follows:

"I am attaching the chart where we ran a pressure test on our brine well on April 13, 1987."

Method used for pressure test:

Close casing and tubing, put pressure recorder on casing and tested for two (2) hours.

P & S Brine Sales hereby commits to performing a cement bond log some time during the five (5) year renewal period.

Item #5:

P & S Brine Sales will notify the EID prior to commencement of drilling, cementing, casing, well loggings, mechanical integrity tests and any other well workover.

Item #6:

Fracturing pressure for salt at the injection intervals at approximately 2400' with down hole pressure resulting from maximum operating pressure is approximately 180 pounds. Injecting fresh water down the casing with brine water returning out of tubing with average pressure of 180 pounds. Injection volume is approximately 3 barrels per minute.

*ridiculous  
but  
immaterial*

Item #7:

P & S Brine Sales will submit to the EID a report at the end of each quarter listing the volume of fresh water injected and the volume of brine water sold. This report will begin at the end of the first quarter of 1988. All reports will meet the signatory requirements.

Item #8:

P & S Brine Sales will notify the EID within 48 hours of any spillage, leakage or contamination.

P & S BRINE SALES  
P. O. Drawer 1769  
Eunice, New Mexico 88231

394-2545

Item #9:

P & S Brine Sales will set the plug at the bottom of the casing and fill the casing from top to bottom with cement.

See attached cost estimate from Halliburton Services.

A copy of the plugging bond is attached.

Item #10 & #11:

Reference: Previous application and Ground Report #6,  
"Geology & Ground Water Conditions in  
Southern Lea County New Mexico", Published  
1961 by Bureau of Mines & Mineral Resources,  
New Mexico Institute of Mining Technology,  
Campus Station, Socorro, New Mexico

Item #12:

In the event of a mishap, P & S Brine Sales agrees to do the following:

1. Inform the EID
2. Pick up all leakage
3. Haul contaminated dirt to approved disposal site
4. Restore area to original condition
5. Should well fail, it will be plugged and abandoned to State & EID specifications



**HALLIBURTON SERVICES**

**FRACTURING  
CEMENTING  
CHEMICAL  
SERVICE**

## **P R O P O S A L**

February 25, 1988

FOR: Mr. Dink Prather  
CHAPARRAL SERVICES  
P. O. Box 1069  
Eunice, New Mexico 88231

Re: P & S Brine Well  
Lea County, New Mexico

The purpose of this analysis is to determine the equipment and materials necessary to plug to abandon the above referenced well.

### RECOMMENDATION:

Set one 100 feet plug at 1200 feet, circulate hole with Mud Laden Fluid. Set 2nd. 100 foot plug at surface.

### COST ESTIMATE:

Pump chg.	\$ 753.00
Mileage (30 miles)	87.00
Cement delivered to location (50 sks. P+)	<u>400.85</u>
TOTAL <sup>40</sup> / <sub>7</sub>	\$1,240.85

The unit prices in this proposal are estimates only based on current published prices and do not include applicable taxes.

We are pleased to have this opportunity to present this proposal for your consideration. If you accept our proposal, all materials and equipment furnished and services performed will be under our General Terms and Conditions and pursuant to our applicable Work Order Contract (whether or not executed by you). Copies of our General Terms and Conditions and applicable Work Order Contract will be furnished on request.

Prepared by *Harold Foster*  
Harold Foster  
Asst. Dist. Mgr.  
Hobbs, N.M.

HDF/bjs

cc: Craig Floyd  
E. Furr

STATE OF NEW MEXICO  
ONE WELL PLUGGING BOND

FOR CHAVES, EDDY, LEA, McKINLEY, RIO ARRIBA, ROOSEVELT,  
SANDOVAL, AND SAN JUAN COUNTIES ONLY

BOND NO. 4420776  
(For Use of Surety Company)

AMOUNT OF BOND \$5,000.00

COUNTY Lea

NOTE: For wells less than 5,000 feet deep, the minimum bond is \$5,000.00\*  
For wells 5,000 feet to 10,000 feet deep, the minimum bond is \$7,500.00\*  
For wells more than 10,000 feet deep, the minimum bond is \$10,000.00

\*Under certain conditions, a well being drilled under a \$5,000.00 or \$7,500.00 bond may be permitted to be drilled as much as 500 feet deeper than the normal maximum depth, i.e., a well being drilled under a \$5,000.00 bond may be permitted to go to 5,499 feet, and a well being drilled under a \$7,500.00 bond may be permitted to go to 10,500 feet.

File with Oil Conservation Commission, P. O. Box 2088, Santa Fe 87501

KNOW ALL MEN BY THESE PRESENTS:

That P & S Brine Sales ~~(a partnership)~~ ~~(a corporation organized in the State of \_\_\_\_\_)~~ with its principal office in the city of \_\_\_\_\_ State of \_\_\_\_\_ and authorized to do business in the State of New Mexico), as PRINCIPAL, and HARTFORD ACCIDENT & INDEMNITY COMPANY, a corporation organized and existing under the laws of the State of Connecticut, and authorized to do business in the State of New Mexico, as SURETY, are held firmly bound unto the State of New Mexico, for the use and benefit of the Oil Conservation Commission of New Mexico pursuant to Section 65-3-11, New Mexico Statutes Annotated, 1953 Compilation, as amended, in the sum of \*\*Five Thousand and no/100\*\* Dollars lawful money of the United States, for the payment of which, well and truly to be made, said PRINCIPAL and SURETY hereby bind themselves, their successors and assigns, jointly and severally, firmly by these presents.

The conditions of this obligation are such that:

WHEREAS, The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases with the State of New Mexico; and

WHEREAS, The above principal has heretofore or may hereafter enter into oil and gas leases, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases on lands patented by the United States of America to private individuals, and on lands otherwise owned by private individuals; and

WHEREAS, The above principal, individually, or in association with one or more other parties, has commenced or may commence the drilling of one well not to exceed a depth of 2,000 feet, to prospect for and produce oil or gas, or carbon dioxide (CO<sub>2</sub>) gas or helium gas, or does own or may acquire, own or operate such well, or such well started by others on land embraced in said State oil and gas leases, or carbon dioxide (CO<sub>2</sub>) leases; or helium gas leases, and on land patented by the United States of America to private individuals, and on land otherwise owned by private individuals, the identification and location of said well being 630 feet from the South Line and 2,427 feet (here state exact legal subdivision by 40 acre tract or lot)  
from the East Line Section 34, Township 31 ~~(XXXX)~~ (South), Range 38 (East) ~~(XXXX)~~ N.M.P.M.  
Lea County, New Mexico.

NOW, THEREFORE, If the above bounden principal and surety or either of them or their successors or assigns, or any of them, shall plug said well when dry or when abandoned in accordance with the rules, regulations, and orders of the Oil Conservation Commission of New Mexico in such way as to confine the oil, gas, and water in the strata in which they are found, and to prevent them from escaping into other strata;

THEN, THEREFORE, This obligation shall be null and void; otherwise and in default of complete compliance with any and all of said obligations, the same shall remain in full force and effect.



# The Hartford Insurance Group

Hartford Plaza  
Hartford, Connecticut 06115

## ENDORSEMENT

Attached to and forming part of Bond No. 4420776, effective  
June 12, 1980, on behalf of P & S Brine Sales  
of Eunice, New Mexico 88231  
in favor of  
Oil Conservation Commission, State of New Mexico  
and in the amount of \* \* Five Thousand and no/100\*\*\*\*\*  
(\$5,000.00\*\*\*\*\* ) DOLLARS.

It is understood and agreed that effective June 12, 1980,  
the Location of the well of the above One well plugging bon  
shall be changed from " 630 Feet from the South Line and 2,427 feet from the East Line of  
Section 34, Township 31, South, Range 38, East, N.M.P.M., Lea County, New Mexico "  
to "630 feet from the South Line and 2,427 feet from the East line of Section 34,  
Township 21, South, Range 37, East, N.M. . P. M., Lea County, New Mexico All other conditions  
and terms to remain as originally written.

Signed, sealed and dated this 19th day of June 19 80

HARTFORD ACCIDENT & INDEMNITY COMPANY

By: *Pat Cargile*  
Pat Cargile, Attorney-in-Fact

ATTEST:

The above endorsement is hereby agreed to and accepted:

By:



[illegible]

## SLD USER CODES

NO<sub>3</sub>, HC, & Toxics: 59600

FACILITY VISITED

Name of Facility: P&S Brine

Location: *Emmitte*

Discharge Plan Number: DP-319

Type of Operation: Brine Station

## ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT

EID Inspector(s): Parker / Lambert

Date of Inspection or Visit:

Discharger's Representative Present During EID Visit:

Name: Steve Prather

Title or Position: *Owner's Son*

Purpose of Visit:

- a. Evaluation of Proposed Discharge Plan  
b. Compliance Inspection of Discharge with Approved Plan  
c. Other (specify) MIT Pressure Test

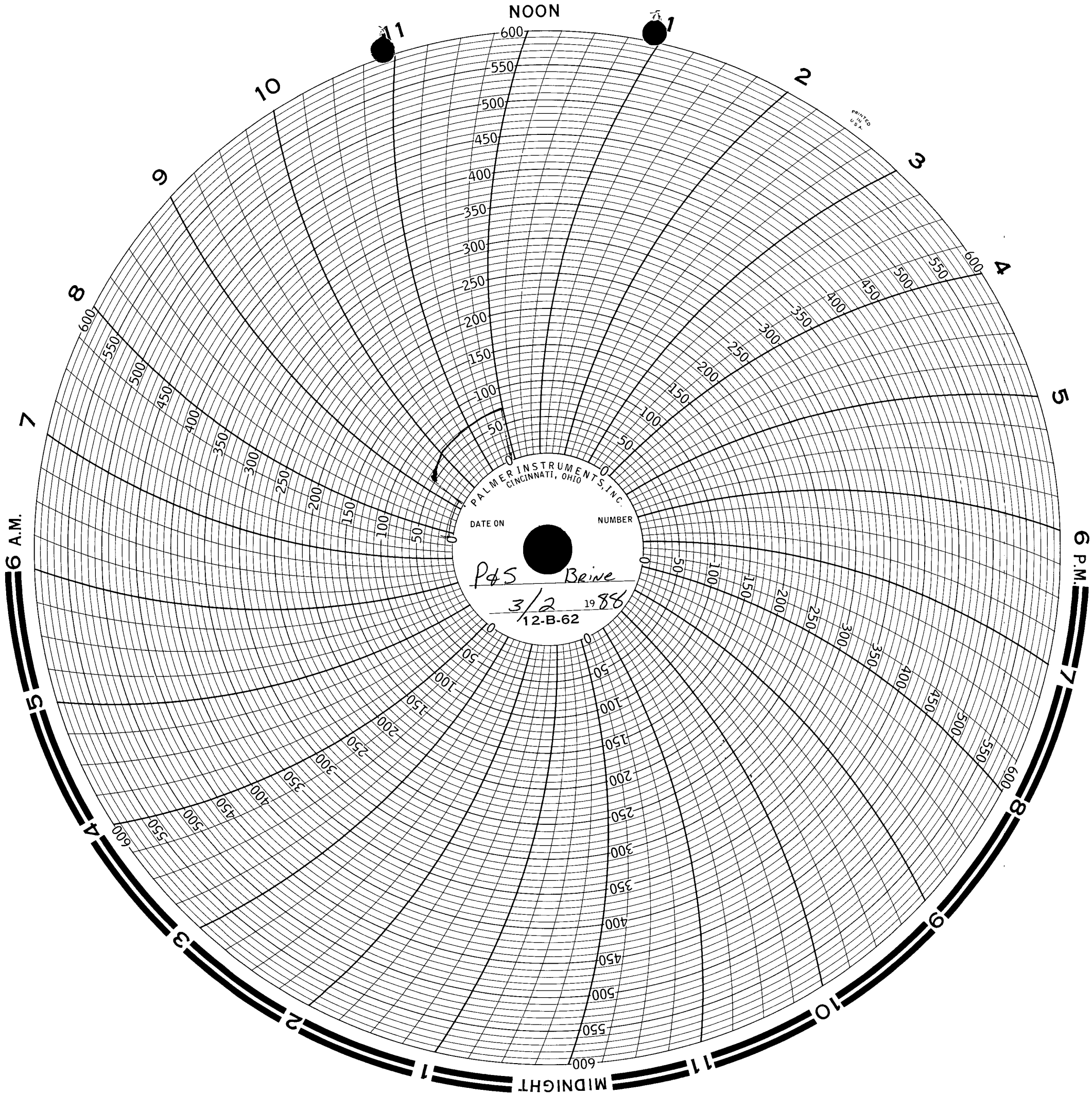
Inspection Activities During Field Visit:

- a. Inspection of Facilities or Construction (specify)
- b. Sampling of Effluents (give sampling locations)
- c. Sampling of Ground Water (give names or locations of wells)
- d. Evaluation of geology, soils, water levels or other physical characteristics of the location (specify)
- e. Other (specify) Conduct 2-hour pressure test.

Observations and Information Obtained during the Visit:

well held pressure

### ACTION REQUIRED



NOON

PRINTED  
U.S.A.

PALMER INSTRUMENTS, INC.  
CINCINNATI, OHIO

DATE ON

NUMBER

P45 Brine  
3/2 1988  
12-B-62

6 A.M.

6 P.M.

MIDNIGHT



Post Office Box 968  
Santa Fe, New Mexico 87504-0968  
ENVIRONMENTAL IMPROVEMENT DIVISION  
Michael J. Burkhardt  
Director

GARREY CARRUTHERS  
Governor  
LARRY GORDON  
Secretary  
CARLA L. MUTH  
Deputy Secretary

December 31, 1987

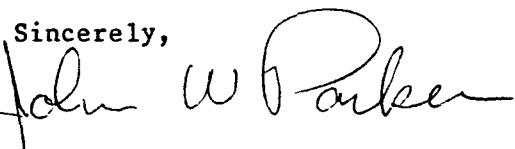
Paul D. Prather  
P & S Brine Sales  
P.O. Box 1769  
Eunice, NM 88231

Dear Mr. Prather:

The Underground Injection Control staff of the New Mexico Environmental Improvement Division Ground Water Section would like to thank you for your cooperation during our recent inspection of P & S Brine Sales brine facility. A copy of the inspection form is attached for your reference. No violations were noted during the inspection.

Thank you for your continued cooperation. Should you have any questions feel free to contact me (827-2902) or John Parker (827-0027).

Sincerely,

*for*   
Kevin Lambert  
Hydrologist  
Ground Water Section

KL:JP:egr

Enclosure

# BRINE STATION INSPECTION FORM

DATE 12/2 1987 EID INSPECTOR Lambert/Parker  
 FACILITY P45 Brine Sales LOCATION EUNICE  
 FACILITY REP ON SITE Dink Prather COUNTY LEA

## WELL OPERATION

WELL IS INJECTING: ☒ 1 well system THROUGH ANNULUS THROUGH TUBING  
 SOURCE OF FRESH WATER Eunice Water  
 TRACE INJECTION/PRODUCTION LINES Buried lines  
 WELL HEAD PRESSURE ~180 PSIG PUMP PRESSURE \_\_\_\_\_ PSIG  
 LEAKS AROUND WELL OR PUMP None

## STORAGE AREA

FOR PONDS:

GENERAL LINER APPEARANCE \_\_\_\_\_

AMOUNT OF FREEBOARD \_\_\_\_\_

ANY SIGN OF OVERFLOW OR LEAKS \_\_\_\_\_

LEAK DETECTION SYSTEM \_\_\_\_\_ FLUIDS \_\_\_\_\_ DRY

FOR TANKS:

GENERAL APPEARANCE Looks Good

LABELLED PLAINLY

BERMED TO PREVENT RUNOFF

CHECK CONTENTS TO ASSURE PROPER FLUID/LABLE MATCH \_\_\_\_\_

NUMBER OF TANKS FOR

BRINE 3

FRESH WATER 1

1,000 gals bbl

1,000 gals bbl

## LOADING AREA

PROPERLY GRADED AND BERMED TO CONTAIN SPILLAGE

ANY EVIDENCE OF RECENT SPILLAGE

DOES FACILITY HAVE A SPILL COLLECTION SYSTEM

ANY EVIDENCE OF OIL SPILLING/DUMPING

☒ YES ☐ NO  
☒ YES ☐ NO  
☒ YES ☐ NO  
☐ YES ☒ NO

*Not much*

## MONITORING WELLS

DEPTH \_\_\_\_\_ FT

SAMPLED THIS VISIT \_\_\_\_\_

STATIC WATER LEVEL \_\_\_\_\_

YES \_\_\_\_\_

NO \_\_\_\_\_

TEMP \_\_\_\_\_

FT BELOW CASING \_\_\_\_\_

Ec \_\_\_\_\_

COMMENTS

Strictly for Chaparral Services

Clean operation

Looks Good



Post Office Box 968  
Santa Fe, New Mexico 87504-0968

ENVIRONMENTAL IMPROVEMENT DIVISION

Michael J. Burkhardt  
Director

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 25, 1987

P & S Brine Sales  
Paul D. Prather, Partner  
P.O. Box 1769  
Eunice, NM 88231

Dear Mr. Prather:

The Environmental Improvement Division's (EID) Ground Water Section has completed review of P & S Brine Sales' (P & S) April 13 and 16, 1987, submittals for renewal of your previously approved discharge plan DP-319. The focus of our review for renewal is on conformance to Part V of the Water Quality Control Commission (WQCC) regulations. Before the evaluation can be completed the following comments and informational requests need to be addressed.

Comments and questions are itemized as follows (WQCC regulatory reference in parenthesis):

1. The discharge plan lacks the signatory requirement certification: "I certify under penalty of law..." which must be signed by a principal executive officer, general partner or duly authorized representative (5-101.H.1. and 2.).
2. Please submit a detailed map showing the "area of review" that identifies the location of all known wells and fractures which may penetrate the injection zone (5-202.A.). The area of review must be at least a quarter mile radius around the injection well and the map must include appropriate scales (5-202.B.2.; 5-210.B.2.). We suggest you contact the local Oil Conservation Division (OCD) office to solicit this information since oil and gas wells would be likely to penetrate the injection zone.
3. Please submit documentation which demonstrates that all known wells, drill holes, shafts, stopes, and other conduits within the area of review which may penetrate the injection zone are properly sealed, completed, plugged or abandoned (5-203.A.; 5-210.B.3.). Also, P & S needs to make a commitment to take such steps (corrective action) as necessary to eliminate conduits for the migration of contaminants into ground water having 10,000 mg/l or less total dissolved solids (5-203.B.; 5-210.B.4.). The OCD may be able to provide information regarding the proper completion or plugging and abandonment of oil and gas wells which may penetrate the injection zone.

Paul D. Prather  
November 25, 1987  
Page 2

4. Please clarify the statement presented in your April 14, 1987 letter, "we ran a pressure test on our disposal well on April 13, 1987." Also, please provide a description of and the methods used for the pressure test to support the test results submitted (5-204.D.).

Finally in order to determine existence of possible conduits for fluid movement, an integral aspect of the Part V MIT requirements, P & S must commit to performing a cement bond log at some point during the five year renewal period (5-204.B.2.; 5-205.A.4.b.).

5. P & S needs to make a commitment to notify this office "prior to commencement of drilling, cementing and casing, well loggings, mechanical integrity tests, and any other well workover..." (5-205.A.5.).
6. Please provide a comparison of fracture pressure for salt at the injection interval (approximately 2,400 feet) with the down-hole pressure resulting from the maximum operating pressure (5-206.A.1.). Also, include a description of the injection procedure for the well containing maximum and average injection pressure, injection volume, and other pertinent procedures (5-205.A.3.b.,f.; 5-210.B.8.,12.).
7. P & S must make a commitment to monitor injected and produced fluid volumes (5-207.C.2.) and report quarterly required monitoring (5-208.B.2.). Also, all reports submitted must meet the report signatory requirements (5-208.C.1.; 5-210.B.16.).
8. P & S needs to make a commitment to notify EID within 48 hours of a leak, spill, or other unanticipated discharge on the surface or underground at your facility (5-208.B.1.).
9. Please explain the method of plug placement and submit cement specifications for final plugging and abandonment of your brine extraction well (5-209.D.). Also, describe the procedure for decommissioning the surface facilities. Please provide copies of the blanket plugging/surety bond and documentation that demonstrates the sum of the bond is adequate to properly plug and abandon the brine well (5-209.A.; 5-210.B.17.).
10. Please provide maps and cross-sections showing vertical and horizontal limits of all ground water having less than 10,000 mg/l TDS (5-210.B.5.).
11. Please provide generalized and specific maps and cross-sections depicting both the regional and site-specific geology (5-210.B.6.,7.).
12. Please provide a detailed contingency plan which at a minimum addresses: surface spills of brine and loss of mechanical integrity in the injection well (5-210.B.15.).

Paul D. Prather  
November 25, 1987  
Page 3

Please respond in writing so that our review and evaluation can be completed. Should you have any questions, please feel free to contact John Parker (827-0027) or myself (827-2902).

Sincerely,

Kevin Lambert

Kevin Lambert  
Hydrologist  
Ground Water Section - UIC Program

KL:egr

cc: Garrison McCaslin, EID District IV Manager, Roswell  
Roelf Ruffner, EID Field Office, Hobbs

P 7484 024 972

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <i>Paul Prother</i>	
Street and No. <i>P.O. Box 1769</i>	
P.O. Code and ZIP Code <i>Cumee, NM</i>	
Postage <i>S</i>	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ <i>1.00</i>
Postmark or Date	

Fold at line over top of envelope to the right  
of the return address.

Permit No.

P-319

Pass

Fail

Well Class

III

Reviewer:

Lambert

Operator

P&amp;S Brine Salts

Date:

8/4/87

Well Name

" Well #1

State:

NM

Well Location

T21S R37E Sec 34

Agency:

EID - GWB

Lease Name

Eunice Well

Drill Date:

7/1/80 spudded

CONSTRUCTION

	size	depth	cement (sacks)	calculated interval
Surface csg.	7"	<sup>1489</sup> 1200 ft	700 5X	
Intermediate csg				
Long string csg.				
Tubing	2 7/8"	<sup>1718</sup> 1700 ft		

Hole size 8 3/4"

Is construction adequate?

☒ yes ☐ no

Packer required?

☐ yes ☒ no

Packer depth

Total Depth 1816 ft

approved  
by OCDHYDROLOGY

USDW Depth (10,000 mg/l)

DTW

Ogula/11A

90' to 120'

Log Types?

Drill Logs

Faults in area addressed?

☐ yes ☐ no

Chemical analysis, formation fluid included?

☒ yes ☐ no

Chemical analysis injected fluid included?

☒ yes ☐ no

Adequate confining layer? Red Beds 800 ft

☒ yes ☐ no

Permitted injection pressure

Gravity flow

Permitted injection rate

Does pressure and rate exceed allowable?

Type of injectant

Fresh Water

City Water from Eunice

Several articles on Geology & Ground Water; 1<sup>st</sup> Article is  
 Geology & groundwater conditions in Southern Lea County,  
 NM Nicholson & Clebsch GW6



GENERAL INFORMATION

Plugging bond or financial assurance included? ☒ yes ☐ no  
Public notice included? ☒ yes ☐ no  
Hearing required? ☐ yes ☒ no  
Citizen comments addressed? *None received* ☐ yes ☐ no  
Workover, if yes put in general comments ☐ yes ☐ no

AREA OF REVIEW *2 mile radius per OCD's request*

Calculated ☐ 1/4 mile ☐ minimum State AOR ☐  
Wells in AOR: ☐ injection *~18* <sup>water wells</sup> production ☐ abandoned  
Deficient wells: *Unknown* construction *Unknown* plugging  
Wells receiving CA: ☐ injection ☐ production ☐ abandoned  
Were all wells addressed for CA? ☐ yes ☐ no

If no, comments: *Specific information unavailable*

*Brine well located in oilfield OCD requires all  
producing oil & gas wells to be properly constructed  
and properly P&A Domestic wells do not penetrate formation*  
AOR landowners notified? ☒ yes ☐ no  
*via Public Notice*

Has well received (pressure test) MIT? ☒ yes ☐ no  
Date of most recent MIT *4/13/87* ☒ pass ☐ fail  
Has absence of fluid movement been demonstrated? ☒ yes ☐ no  
Enforcement actions included? ☐ yes ☒ no

If yes, comments: \_\_\_\_\_

*(A) No Domestic/Water Supply Wells penetrate  
below Red Beds.*

Has well been a SNC? ☐ yes ☒ no  
Is all information in permit? ☐ yes ☐ no

Is permit issued properly?

☒ yes ☐ no

Citizen comments and investigations?

*None Required*

☐ yes ☐ no

If yes, comments:

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PLUGGING AND ABANDONMENT

*Well is operating Have submitted  
P & A schedule*

Properly Plugged?

☐ yes ☐ no

Cement Placement

Cement (sx)

\_\_\_\_\_ from \_\_\_\_\_ to \_\_\_\_\_

\_\_\_\_\_ from \_\_\_\_\_ to \_\_\_\_\_

\_\_\_\_\_ from \_\_\_\_\_ to \_\_\_\_\_

Required Placement

from \_\_\_\_\_ to \_\_\_\_\_

*Set plug (cast iron)  
at 1480 ft, cement from  
plug to surface*

from \_\_\_\_\_ to \_\_\_\_\_

from \_\_\_\_\_ to \_\_\_\_\_

from \_\_\_\_\_ to \_\_\_\_\_

GENERAL COMMENTS

*(A)*

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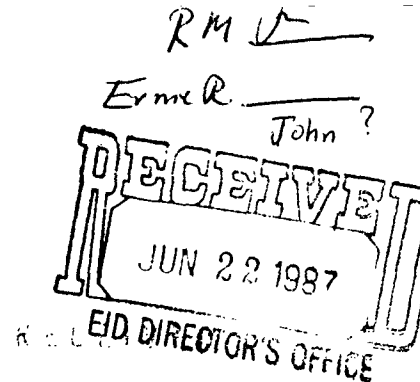
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**UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE**

Ecological Services  
Suite D, 3530 Pan American Highway NE  
Albuquerque, New Mexico 87107

June 19, 1987



JUN 22 1987

Mr. Michael J. Burkhardt, Director  
New Mexico Health and Environment Department  
Environmental Improvement Division  
P. O. Box 968-Crown Building  
Santa Fe, New Mexico 87504-0968

GROUNDWATER/HAZARDOUS WASTE  
BUREAU

Dear Mr. Burkhardt:

This responds to your public notice dated May 6, 1987 in which several proposed groundwater discharge plans were described. We have reviewed all of the plans and have not identified any resource issues of concern to our agency in the following:

DP-212, Chevron, USA Inc., Bernalillo County, Albuquerque, NM.  
DP-229, The Town of Clayton, Union County, Clayton, NM.  
DP-319, P and S Brine Sales, Lea County, Eunice, NM. ✓  
DP-481, Parkview State Trout Hatchery, Rio Arriba County, NM.  
DP-480, Porte Dairy, Chaves County, Roswell, NM.  
DP-71, Quivira Mining Company, McKinley County, NM.  
DP-477, Willie and Josephine Romero, San Miguel County, NM.  
DP-482, Swiss Chalet Inn, Taos County, Taos, NM.  
DP-476, Timberon T-15 Subdivision, Otero County, Ruidoso, NM.  
DP-321, Wasserhund Inc., Lea County, Lovington, NM  
DP-479, Window Service Restaurant, Dona Ana County, Chamberino, NM.

These comments represent the views of the Fish and Wildlife Service. If you have any questions concerning our comments, please contact Tom O'Brien at FTS 474-7877 or (505) 883-7877.

Sincerely yours,

John C. Peterson  
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Regional Administrator, Environmental Protection Agency, Dallas, Texas  
Regional Director, FWS, FWE, Albuquerque, New Mexico



Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 7, 1987

P and S Brine Sales  
Paul D. Prather, Partner  
P.O. Box 1769  
Eunice, New Mexico 88231

Dear Mr. Prather:

Enclosed is a copy of the public notice pertaining to your proposed discharge which was issued by this division pursuant to New Mexico Water Quality Control Commission Regulations, Section 3-108.

If you have any questions, please do not hesitate to contact me at the address listed above or at phone number (505) 827-2900.

Sincerely,

Ernest C. Rebuck  
Program Manager  
Ground Water Section

ECR/mp

Enclosure



Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 6, 1987

The Honorable JoAnn Martin, Mayor  
City of Hobbs  
P.O. Box 1117  
Hobbs, New Mexico 88240

Dear Mayor Martin:

Enclosed is a public notice which includes notice of a proposed discharge plan(s) for one or more operations in or near your city.

If you have any questions, please do not hesitate to contact me at the address given above or at 827-2900.

Sincerely,

Ernest C. Rebuck  
Program Manager  
Ground Water Section

ECR/mp

Enclosure



Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 6, 1987

Board of County Commissioners  
Lea County Courthouse  
Hobbs, New Mexico 88240

Board of County Commissioners:

Enclosed is a public notice for one or more operations located in your county.

If you have any questions, please do not hesitate to contact me at the address listed above or at phone number (505) 827-2900.

Sincerely,

Ernest C. Rebuck  
Program Manager  
Ground Water Section

ECR/mp

Enclosure

MAY 6, 1987

TO BE PUBLISHED ON OR BEFORE MAY 18, 1987

**PUBLIC NOTICE**  
**NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION**

Notice is hereby given that, pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the New Mexico Environmental Improvement Division, P.O. Box 968, Santa Fe, New Mexico 87504-0968; telephone (505) 827-2900.

(DP-212) CHEVRON, USA INCORPORATED, P.O. Box 1776, Albuquerque, New Mexico 87103, John D. Douglas, Superintendent, has submitted a renewal request for the Chevron bulk fuel terminal located in Section 32, T10N, R3E, Bernalillo County. Approximately 1000 gallons per month of hydrocarbon fuel contaminated water is discharged from an oil-water separator to a lined evaporation pond. The groundwater most likely to be affected is at a depth of approximately 35 feet with a total dissolved solids content of approximately 500 mg/l.

(DP-229) CLAYTON, THE TOWN OF, Bill Freeman, Acting City Manager, 1 Chestnut Street, Clayton, New Mexico 88415, proposes to renew its approved discharge plan (DP-229) for the facultative lagoon for their sewage treatment plant located in T25N, R35E, Section 1, NW $\frac{1}{4}$  of SW $\frac{1}{4}$  of NE $\frac{1}{4}$ , Union County, New Mexico. Discharge from the plant is expected to be 360,000 gallons per day. The ground water most likely to be affected is at a depth of approximately 110 feet and has a total dissolved solids content of approximately 450 mg/l.

(DP-319) P AND S BRINE SALES, Paul D. Prather, Partner, P.O. Box 1769, Eunice, New Mexico 88231, proposes to renew its approved discharge plan (DP-319) for their brine in situ extraction well and surface facility located in T21S, R37E, Section 34, SW $\frac{1}{4}$  of SE $\frac{1}{4}$ , Lea County, New Mexico. Brine is manufactured by injecting water down their injection well to an underlying salt formation. The brine water solution has a total dissolved solids content of approximately 300,000 mg/l. Ground Water most likely to be affected is at a depth of approximately 45 feet and has a TDS content of about 1400 mg/l.

(DP-481) PARKVIEW STATE TROUT HATCHERY, New Mexico Department of Game and Fish, Villagra Building, Santa Fe, New Mexico 87503, proposes to discharge 3,450 gallons per day of domestic septage to a septic tank-leach field mound system. The location of the discharge site is T29N, R3E (projected), Tierra Amarilla Land Grant, Rio Arriba County, New Mexico. The site is approximately one mile southeast of the town of Parkview. The ground water most likely to be affected is at a depth of 20 ft. with a total dissolved solids concentration of 343 mg/l.

(DP-480) PORTE DAIRY, Tom Visser, Owner, Rt. 2, Box 108, Roswell, New Mexico 88201, located in Chaves County at T12S, R25E, Section 25, proposes to discharge 70,000 gallons per day of milking parlor washdown wastes from a 1200 cow dairy. The discharge will report to total retention evaporative lagoons. The discharge will have a concentration of approximately 150 mg/l of total kjeldahl nitrogen. Four ground water monitor wells will be installed to ascertain any impacts from the lagoons. The ground water most likely to be affected lies at approximately 80 feet below the surface of the ground and has a total dissolved solids concentration of 4500 mg/l.

(DP-71) QUIVIRA MINING COMPANY, c/o J.C. Stauter, Director of Nuclear Licensing and Registration, P.O. Box 25861, Oklahoma City, Oklahoma 73125, proposes to modify its existing discharge plan to allow the disposal of a wash solution to be produced in the processing of an alternate mill feed material. The current discharge plan allows evaporation of uranium mill tailings solutions in 11 lined evaporation ponds in Section 4, T13N, R9W, McKinley County. The proposed modification would allow the disposal of wash water used to remove excess nitrate from a solid uranium-containing residue generated in the yellowcake purification step at the Sequoyah Fuels Corporation's UF6 Conversion Plant at Gore, Oklahoma. Two of the evaporation ponds will be dedicated to this wash solution. This wash water will be lower in all constituents than the mill solutions currently permitted with the exception of nitrate. Nitrate concentrations of the wash solution are estimated to range from 2432 mg/l to 3040 mg/l and have a total dissolved solids concentration of 15,260 to 19,075 mg/l. Ground water in Section 4 occurs at a depth of approximately 40 to 60 feet and has a total dissolved solids concentration of 2000 to 5000 mg/l.

(DP-477) ROMERO, WILLIE AND JOSEPHINE, Rt. 1 Box 146, Santa Fe, New Mexico 87501, proposes to discharge up to 2000 gallons per day of domestic septage from a small trailer court into a septic leach field. The discharge is located in San Miguel County, T16N, R12E, Section 32, NW $\frac{1}{4}$ , NW $\frac{1}{4}$ , SE $\frac{1}{4}$ . The ground water most likely to be affected is at a depth of about 60 feet and averages about 400 mg/l total dissolved solids.

(DP-482) SWISS CHALET INN, Paul Austing, Owner, Box 8, Taos Ski Valley, Taos, New Mexico 87571, proposes to discharge 3000 gallons per day of grey-water from a resort inn to a septic tank leachfield system. Black water will be discharged to holding tanks and then periodically removed by septic tank pumper trucks. The discharge will be located in the Amizette Subdivision, Lots 4 & 5, T27N, R14E, Section 7 (projected) in Taos County. The depth to ground water is approximately 50 feet with a total dissolved solids content of approximately 100 mg/l.

(DP-476) TIMBERON T-15 SUBDIVISION, Johnny Mobley, North American Land Development, Inc., P.O. Box 98, Ruidoso, New Mexico 88345, proposes to discharge a maximum of 6000 gallons per day of domestic sewage to a septic tank-leach field system. The system consists of 3 interconnected septic tanks each receiving a maximum of 2000 gallons per day. The discharge site is located at T19S, R12E, Section 23 in Otero County. Domestic sewage from 19 presently occupied homes in the Timberon Subdivision will enter the sewage system at 3 separate discharge points. The ground water most likely to be affected is at a depth of 80 feet with a total dissolved solids concentration of 490 mg/l.

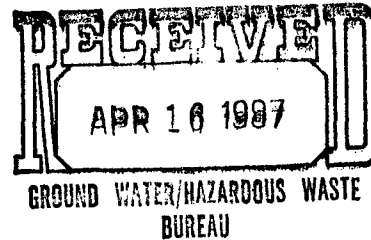
(DP-321) WASSERHUND INCORPORATED, J.E. Haseloff, President, P.O. Box 249, Lovington, New Mexico 88260, proposes to renew its approved discharge plan for their brine in situ extraction well and surface facility located in T16S, R35E, Section 31, Lea County, New Mexico. The brine water solution has a total dissolved solids content of approximately 250,000 mg/l. Ground water most likely to be affected is at a depth of approximately 120 feet and has a TDS content of about 500 mg/l.

(DP-479) WINDOW SERVICE RESTAURANT, Patricio Tellez, 10125 Highway 28, Chamberino, New Mexico 88027, proposes to discharge 2,400 gallons per day of waste water from a restaurant to a septic tank-leach field. The restaurant is in T26S, R3E, Section 18 in Dona Ana County, New Mexico. The waste water has a nitrate concentration of approximately 60 mg/l. The ground water most likely to be affected is at a depth of about 15 feet and has a total dissolved solids content of 700 mg/l.



Any interested person may obtain further information from the Ground Water Section, Ground Water/Hazardous Waste Bureau, EID, and may submit written comments to the Director of the EID at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of EID will allow thirty (30) days after the date of publication of this Notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why the hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

April 14, 1987



Health & Environment Department  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: Mr. Kevin Lambert

Dear Mr. Lambert:

In order to conform with #5-209, our plugging procedure will be as follows:

Set cast iron bridge plug at 1480' and fill 7" casing from plug to surface with cement.

I am attaching the chart where we ran a pressure test on our disposal well on April 13, 1987.

Should you need any further information, please feel free to call me at 505-394-2545.

Yours very truly,

P & S BRINE SALES

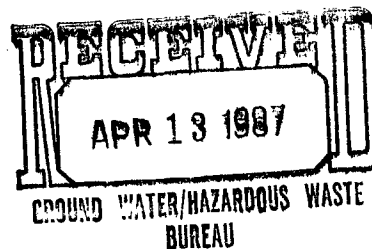
A handwritten signature in cursive script that reads "Paul D. Prather".

Paul D. Prather  
Partner

PDP:js

P & S Brine Sales  
P. O. Drawer 1769  
Eunice, New Mexico 88231

April 8, 1987



Health & Environment Department  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: Mr. Kevin Lambert

Dear Mr. Lambert:

Attached please find the information which you requested for approval of the brine station.

If you should need further information, please call me at 394-2545.

Yours very truly,

P & S BRINE SALES

A handwritten signature in dark ink, appearing to read "Paul Prather", written over a horizontal line.

Paul Prather  
Partner

PDP:js  
Enc/

P & S Brine Sales  
P. O. Drawer 1769  
Eunice, New Mexico 88231

*Ernie* 4/13/87  
This is DP  
renewal for  
P+S Brine Sales  
Gerry has already  
requested additional  
information for DP  
review / Awaiting Arrival  
to Kevin to  
renewal

P & S BRINE SALES  
P. O. Box 1768  
Eunice, New Mexico 88231  
505-394-2545

January 20, 1986

Environmental Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Re: DP-319 - Discharge Plan for P & S Brine Sales

Dear Paige Morgan:

Please find attached copies and photos of amendments that have been made to brine P & S Brine Sales into compliance with your rules and regulations for the Environmental Improvement Division.

If we can be of further assistance and should anything need to be changed, please let us know.

We will notify Don Lutgins so that he may inspect this facility.

Yours very truly,

P & S BRINE SALES

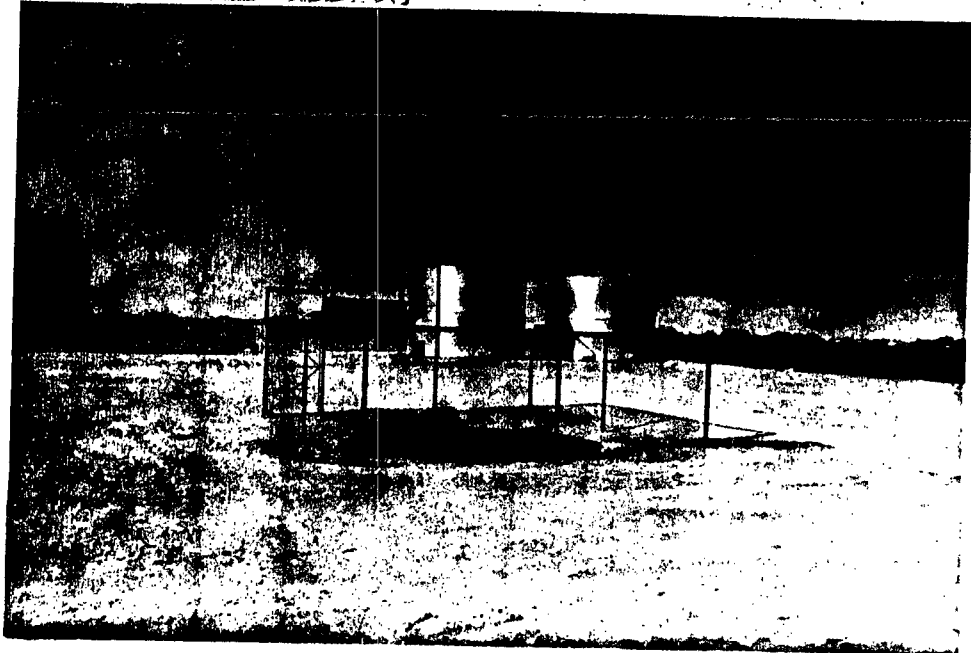
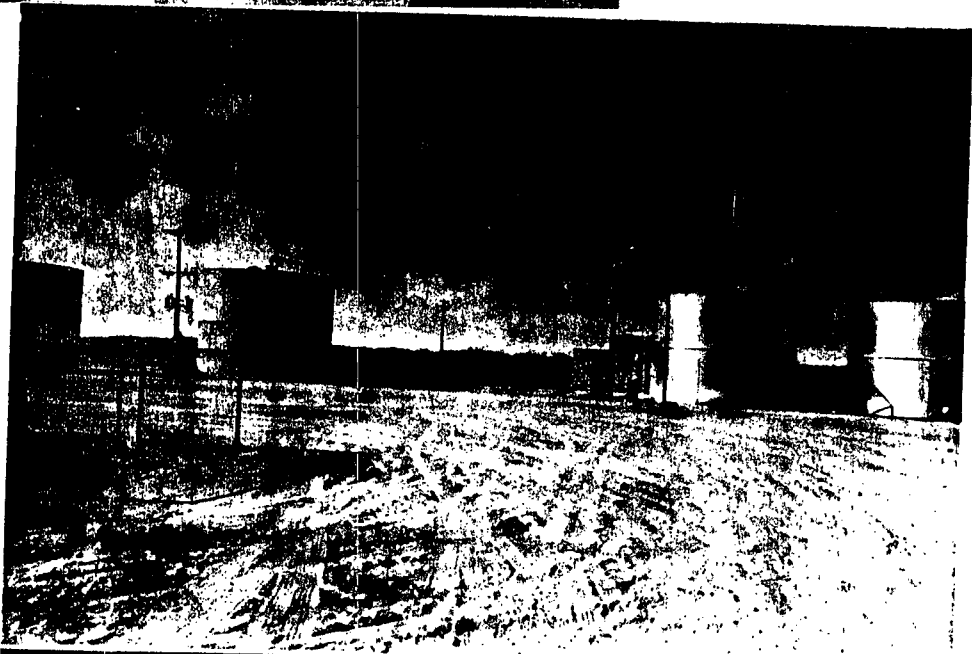
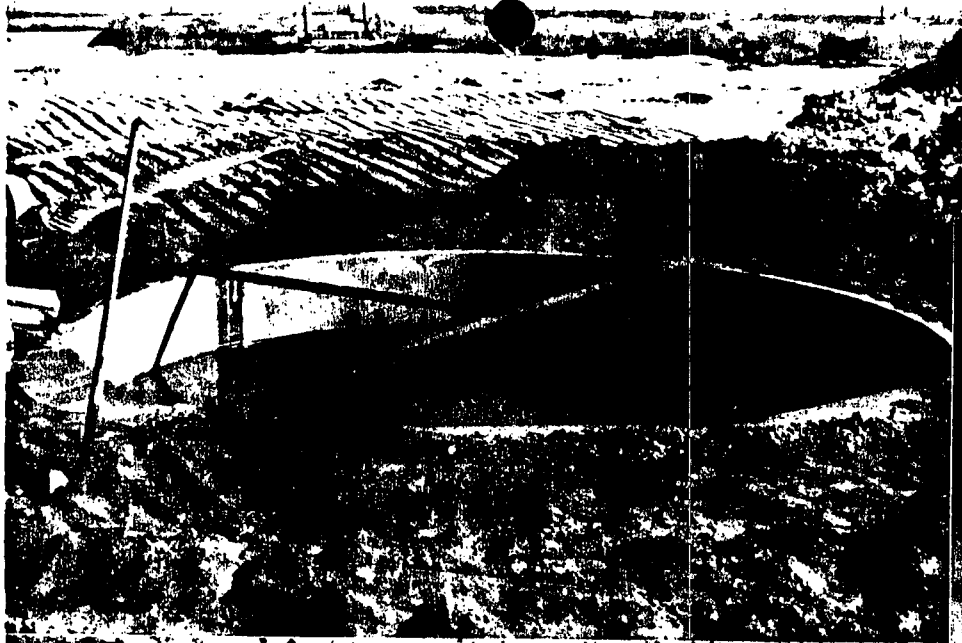
Paul D. Prather

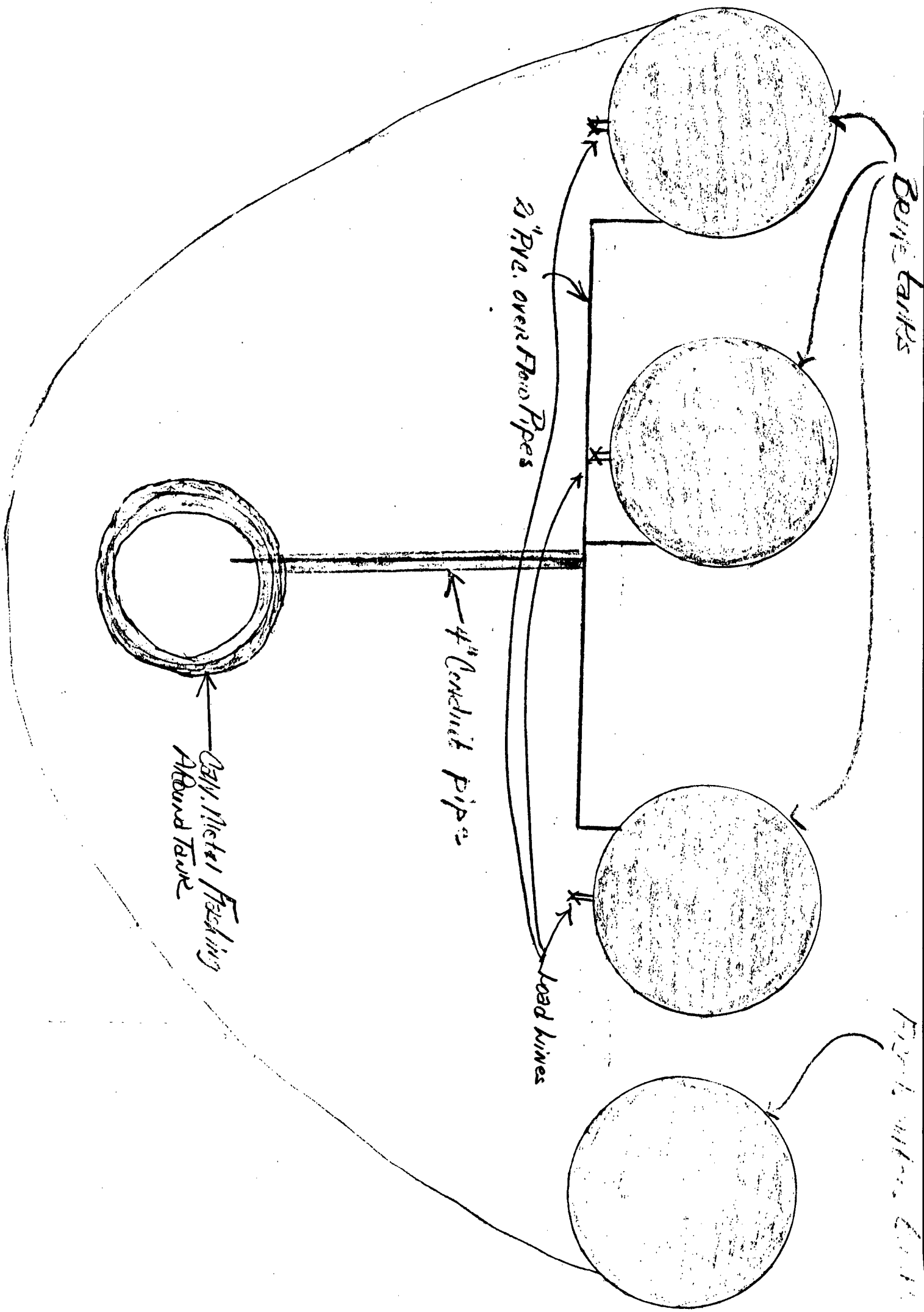
PDP:js  
Enc/5



**THE REPRODUCTION OF  
THE  
FOLLOWING  
DOCUMENT ( S )  
CANNOT BE IMPROVED  
DUE TO  
THE CONDITION OF  
THE ORIGINAL**

F + S. BRINE





Brine tanks

Well Head

2 1/2" PVC. over Flow Pipes

4" Conduct Pipe

Well Head

Load lines

1000 Gall. Brine Tank

3" P.V.C. overflow lines

4" Gasdrill Pipe

3' Foot TOP SOIL

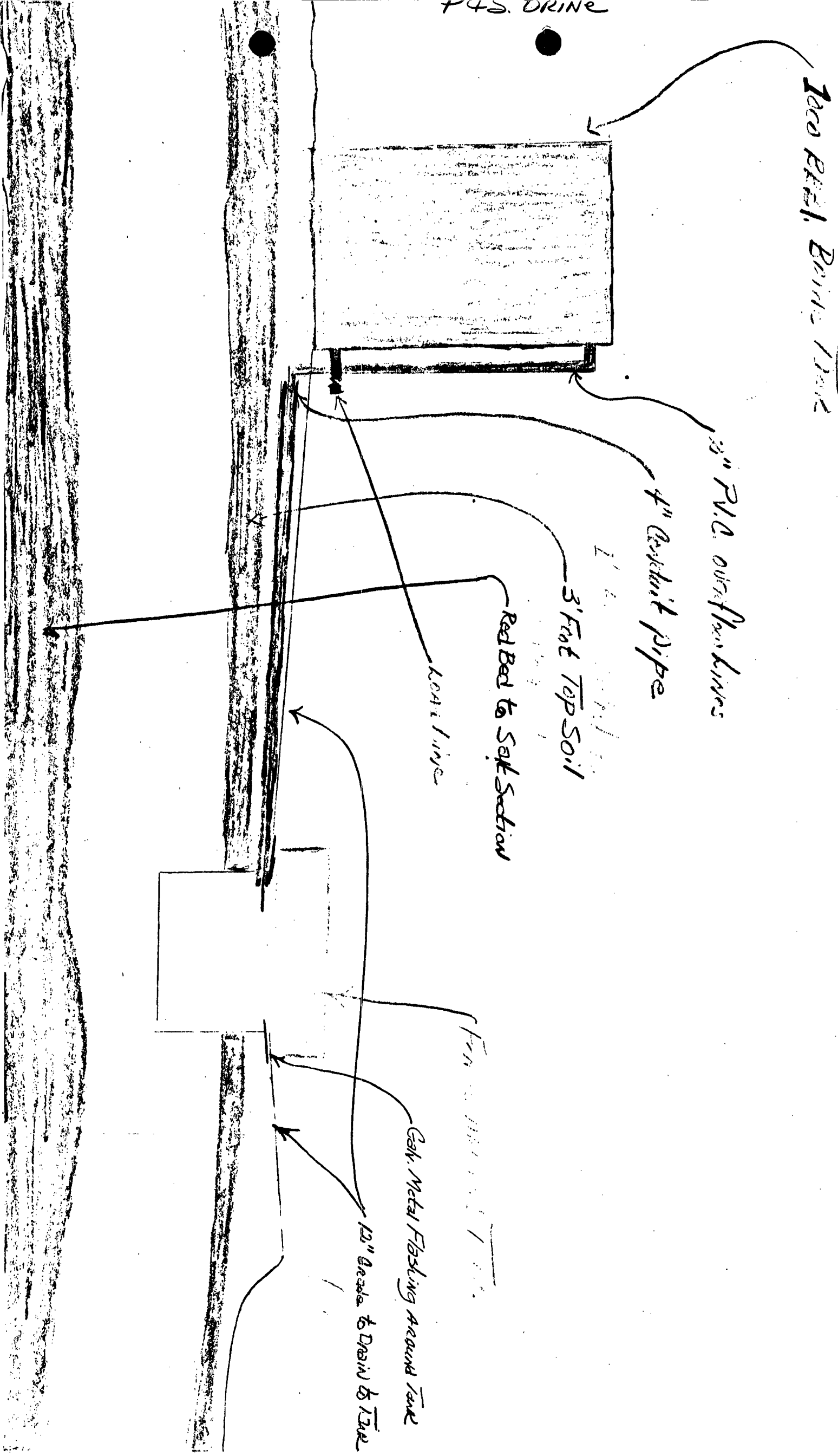
Red Bed to Salt Section

coal line

Galv. Metal Flashing Around Tank

12" Gravel to Drain to Trench

425. DRAIN





P. O. BOX 1737  
EUNICE, NEW MEXICO 88231

Nº 13198

Date 12-23-85  
Company Chaparral Perm St  
Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Bbls. Production Water  
Bbls. B S & W  
Bbls. Solids  
Remarks 11 Gals  
\_\_\_\_\_  
\_\_\_\_\_  
Truck No. \_\_\_\_\_  
Lease Name \_\_\_\_\_  
Accepted by [Signature]  
Company Representative

PARABO, Inc.

P. O. BOX 1737  
EUNICE, NEW MEXICO 88231

Nº 13199

Date 2-23-85  
Company Chaparral Perm St  
Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Bbls. Production Water  
Bbls. B S & W  
Bbls. Solids  
Remarks 12 Gals  
\_\_\_\_\_  
\_\_\_\_\_  
Truck No. \_\_\_\_\_  
Lease Name \_\_\_\_\_  
Accepted by [Signature]  
Company Representative

24 yards clay Dkt Hauled to Parabo -

Fiberglass  
Tank  
Manufacturers

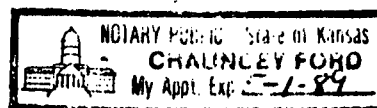
# GLASCO TANK CO.

Route 2 - Box 147  
Ellinwood, Ka. 67526  
(316) 564-2502

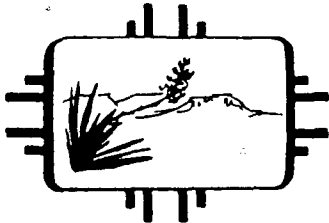
January 13, 1986

This is to certify that Glasco Tank  
Company, Inc. tanks will not leak,  
and are free of defects.

*Sam Casey*  
Sam Casey  
President



*Chalmers Ford*



NEW MEXICO  
HEALTH AND ENVIRONMENT  
DEPARTMENT

Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

April 8, 1987

Mr. Paul Prather  
P & S Brine Sales  
P. O. Box 1768  
Eunice, New Mexico 88231

Dear Mr. Prather:

I have enclosed the information concerning your discharge plan that you requested. This data will be helpful in completing your application to renew your discharge plan.

Some of the areas that have not been addressed in your present plan are:

1. Testing the mechanical integrity of the well,
2. Determination of an area of review and inventory of wells in the area of review,
3. Changes in monitoring requirements,
4. Plugging and abandonment schedule.

If you have any questions or need assistance, please contact Kevin Lambert at (505) 827-2902.

Sincerely yours,

Gerard Koschal  
Water Resource Specialist



Post Office Box 968  
Santa Fe, New Mexico 87504-0968

GABRIEL GARCIA-HERNANDEZ  
Governor

LARRY GORDON  
Secretary

CARLA L. MUTH  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 1987

Paul D. Prather  
P & S Brine Sales  
P.O. Box 1768  
Eunice, NM 88231

RE: Discharge Plan DP-319

Dear Mr. Prather:

In the summer of 1983, the Water Quality Control Commission (WQCC) transferred its delegation of authority from the Oil Conservation Division (OCD) to the Environmental Improvement Division (EID) to administer discharge plans for brine extraction facilities. On December 18, 1982, the discharge plan DP-319 for the P & S Brine Sales brine station in Eunice located in Lea County was approved by the Director of the OCD. This discharge plan was required and submitted pursuant to WQCC Regulations and it was approved for a period of up to five years. The approval will expire on December 18, 1987.

If you are still discharging at this facility and wish to continue discharging, please submit your application for renewal of plan approval, including a complete Part 5 discharge plan amendment/renewal, as quickly as possible. The necessary forms for making those submissions are enclosed. Submitting your application in a timely fashion will aid the EID in processing your discharge plan prior to the expiration date. Also, please indicate whether you have made or intend to make any changes in your discharge.

Section 5-101.G. of the WQCC regulations assures that those who are in compliance with their approved discharge plan on the date of its expiration, and who submit a complete application for a discharge plan renewal at least 180 days before the expiration date, which in this case would be June 15, 1987, will remain in compliance until the application for discharge plan renewal has been approved or disapproved. Applications for renewals submitted after June 15, 1987 may result in a discharge not in compliance, if EID is not provided sufficient time to process the application. Therefore, the EID recommends you submit an application for discharge plan renewal which include and adequately address all of the information necessary for evaluation of a new discharge plan well in advance of June 15, 1987.

EQUAL OPPORTUNITY EMPLOYER

Paul D. Prather  
February 25, 1987  
Page 2

If you are no longer discharging and discharge plan renewal is not needed,  
please notify this office.

If you have any questions, please do not hesitate to contact me at the address  
listed on the letterhead or telephone number 827-2902.

Sincerely,



Kevin Lambert  
Hydrologist  
Ground Water Section/Underground  
Injection Control

KL:egr

Enclosures

cc: Garrison McCaslin, EID District IV Manager, Roswell

PS Form 3800, June 1985 ☆ U.S.G.P.O. 1985-480-794

Sent to <i>Paul D. Prather</i>	
Street and No.	<i>P.O. Box 1768</i>
P.O. Box and ZIP Code	<i>Souree, NM</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

*Fold at line over top of envelope to the right of the return address*

P 307 966 851  
RECEIPT FOR CERTIFIED MAIL  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

# BRINE STATION INSPECTION FORM

DATE 12/10 1986 EID INSPECTOR Lambert, Koschal Baker  
 FACILITY P&S Brine Sales LOCATION Eunice  
 FACILITY REP ON SITE None Available COUNTY LEA  
DP-319

## WELL OPERATION

WELL IS INJECTING: ☒ THROUGH ANNULUS ☐ THROUGH TUBING  
 SOURCE OF FRESH WATER ? City of Eunice ? may have well  
 TRACE INJECTION/PRODUCTION LINES Buried Lines & Surface Lines to Brine Tanks  
 WELL HEAD PRESSURE \_\_\_\_\_ PSIG PUMP PRESSURE \_\_\_\_\_ PSIG  
 LEAKS AROUND WELL OR PUMP None

## STORAGE AREA

FOR PONDS:  
 GENERAL LINER APPEARANCE \_\_\_\_\_

AMOUNT OF FREEBOARD \_\_\_\_\_  
 ANY SIGN OF OVERFLOW OR LEAKS \_\_\_\_\_  
 LEAK DETECTION SYSTEM ☐ FLUIDS ☐ DRY

FOR TANKS:  
 GENERAL APPEARANCE Good Shape  
 LABELED PLAINLY ☐ YES ☒ NO Can tell difference  
 BERMED TO PREVENT RUNOFF ☒ YES ☐ NO Slope toward collection sump  
 CHECK CONTENTS TO ASSURE PROPER FLUID/LABLE MATCH \_\_\_\_\_

NUMBER OF TANKS FOR 4 BRINE 3 FRESH WATER 1

## LOADING AREA

PROPERLY GRADED AND BERMED TO CONTAIN SPILLAGE ☒ YES ☐ NO  
 ANY EVIDENCE OF RECENT SPILLAGE ☐ YES ☒ NO  
 DOES FACILITY HAVE A SPILL COLLECTION SYSTEM ☒ YES ☐ NO  
 ANY EVIDENCE OF OIL SPILLING/DUMPING ☐ YES ☒ NO

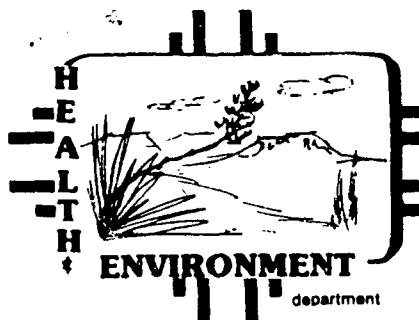
## MONITORING WELLS

DEPTH \_\_\_\_\_ FT STATIC WATER LEVEL \_\_\_\_\_ FT BELOW CASING  
 SAMPLED THIS VISIT ☐ YES ☐ NO TEMP \_\_\_\_\_ Ec \_\_\_\_\_

COMMENTS Facility in good shape  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 10:00 am	Date 7-9-86
Originating Party Don Lotjens 397-5250		Other Parties Karl Souder	
Subject Complaint from citizens re "routine" dumping of brine at McCasland Trucking, Ave. O, Eureka			
Discussion Don Lotjen has seen dumping occurring. Says it appears that either brine or saline wash water is routinely disposed in their parking lot. He also saw an apparently unlined waste pond containing oily wastes at the site.			
NOT SIMS McCASLAND BRINE STATION			
Conclusions or Agreements Steve - Don would like you to call him for details. Frequently dumping brine by spraying out on property. Neighbor complained about salt killing her trees. Don will send a memo & photos. I told him they are in process of modifying their discharge plan. GWS			
Distribution File		Signed Karl Souder	



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968

(505) 984-0020

**TONEY ANAYA**  
**GOVERNOR**

**DENISE D. FORT**  
**DIRECTOR**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 19, 1986

Mr. Paul D. Prather  
P & S Brine Sales  
P.O. Box 1768  
Eunice, New Mexico 88231

Dear Mr. Prather:

The modification of the discharge plan (DP-319) for your Brine Sales Facility located in Lea County, New Mexico is hereby approved. The approved discharge plan modification consists of the materials dated January 20, 1986 plus the information and materials submitted as part of the original discharge plan approved December 18, 1982.

The discharge plan modification application was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109. Please note Subsections 3-109.E. and 3-109.F., which provide for possible future amendment of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

There will be no monitoring or reporting requirements.

Pursuant to Subsection 3-109.G.4., this modification approval expires December 18, 1987, the same date as the original plan, and you should submit an application for a new approval in ample time for that date.



Paul D. Prather  
Page 2  
May 19, 1986

On behalf of the staff of the Ground Water Section, I wish to thank you for your cooperation during this discharge plan review.

Sincerely,



Ernest Rebuck  
Bureau Chief  
Ground Water/Hazardous Waste Bureau

ER/SWS/mp

cc: EID District IV Manager, Roswell  
EID Hobbs Field Office, Hobbs

## E I D B U C K S L I P

CHECK ONE:

☒ LETTER TO Mr. Paul D. Prather  
for Ernest Rebuck's signature

☐ MEMO TO \_\_\_\_\_

☐ PRESS RELEASE

☐ OTHER \_\_\_\_\_

SUBJECT: P & S Brine Sales

DRAFTED BY: Steve Sares 5/16/86  
(Date)

CONCURRENCES:

NAME:	INITIAL	DATE REC'D	DATE APPROVED
<u>Karl Souder</u> Sect. Mgr.	<u>KOS</u>	<u>5/19</u>	<u>5/19</u>
<u>Ernest Rebuck</u> Bur. Chief	<u>KOS</u>	<u>5/19</u>	<u>5/19</u>
<u>Richard Holland</u> Dep. Dir.	_____	_____	_____
<u>Denise Fort</u> Director	_____	_____	_____

FINAL DECISION NEEDED BY MAY 19 BECAUSE This Sat  
(date)  
around after Paige left & we need to respond. e.g.  
It's been longer than 60 days

COMMENTS BY DRAFTER OR REVIEWER(S):

these are minor modifications for spill catchment  
at a brine well in Eunice, NM

[illegible]

FIELD TRIP REPORT  
GROUND WATER SECTION

SLD USER CODES

County LEA

Ground Water: 59300

NO<sub>3</sub>, HC, & Toxics: 59600

UIC: 59500

FACILITY VISITED

Name of Facility: PES Brine Station

Location: FUNKE

Discharge Plan Number: DP-

Type of Operation: BRINE WELL

## ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT

EID Inspector(s): KALES/BAKER

Date of Inspection or Visit: 2/11/86

Discharger's Representative Present During EID Visit:

Name: Dink Father

Title or Position: owner

Purpose of Visit:

- a. Evaluation of Proposed Discharge Plan Modification
- b. Compliance Inspection of Discharge with Approved Plan \_\_\_\_\_
- c. Other (specify) \_\_\_\_\_

Inspection Activities During Field Visit:

- a. Inspection of Facilities or Construction (specify)  
Spill tank that was installed is fiberglass with galvanized flashing around top. Area is properly sloped to catch spills from loading area.
- b. Sampling of Effluents (give sampling locations)

- c. Sampling of Ground Water (give names or locations of wells)

- d. Evaluation of geology, soils, water levels or other physical characteristics of the location (specify)

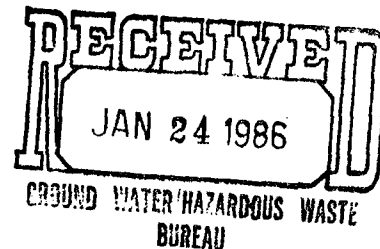
- e. Other (specify)  
Well was set up to inject thru annulus, produce thru tube

Observations and Information Obtained during the Visit:

Mr Prather was cooperative, wanted to know if we were after other brine wells. We talked at length about history of Gd contamination around Eonice & why EID Bothered working around there

### ACTION REQUIRED

P & S BRINE SALES  
P. O. Box 1768  
Eunice, New Mexico 88231  
505-394-2545



January 20, 1986

Environmental Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Re: DP-319 - Discharge Plan for P & S Brine Sales

Dear Paige Morgan:

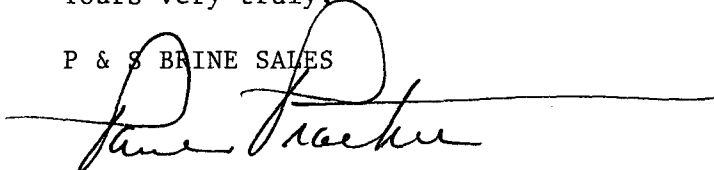
Please find attached copies and photos of amendments that have been made to brine P & S Brine Sales into compliance with your rules and regulations for the Environmental Improvement Division.

If we can be of further assistance and should anything need to be changed, please let us know.

We will notify Don Lutgins so that he may inspect this facility.

Yours very truly,

P & S BRINE SALES

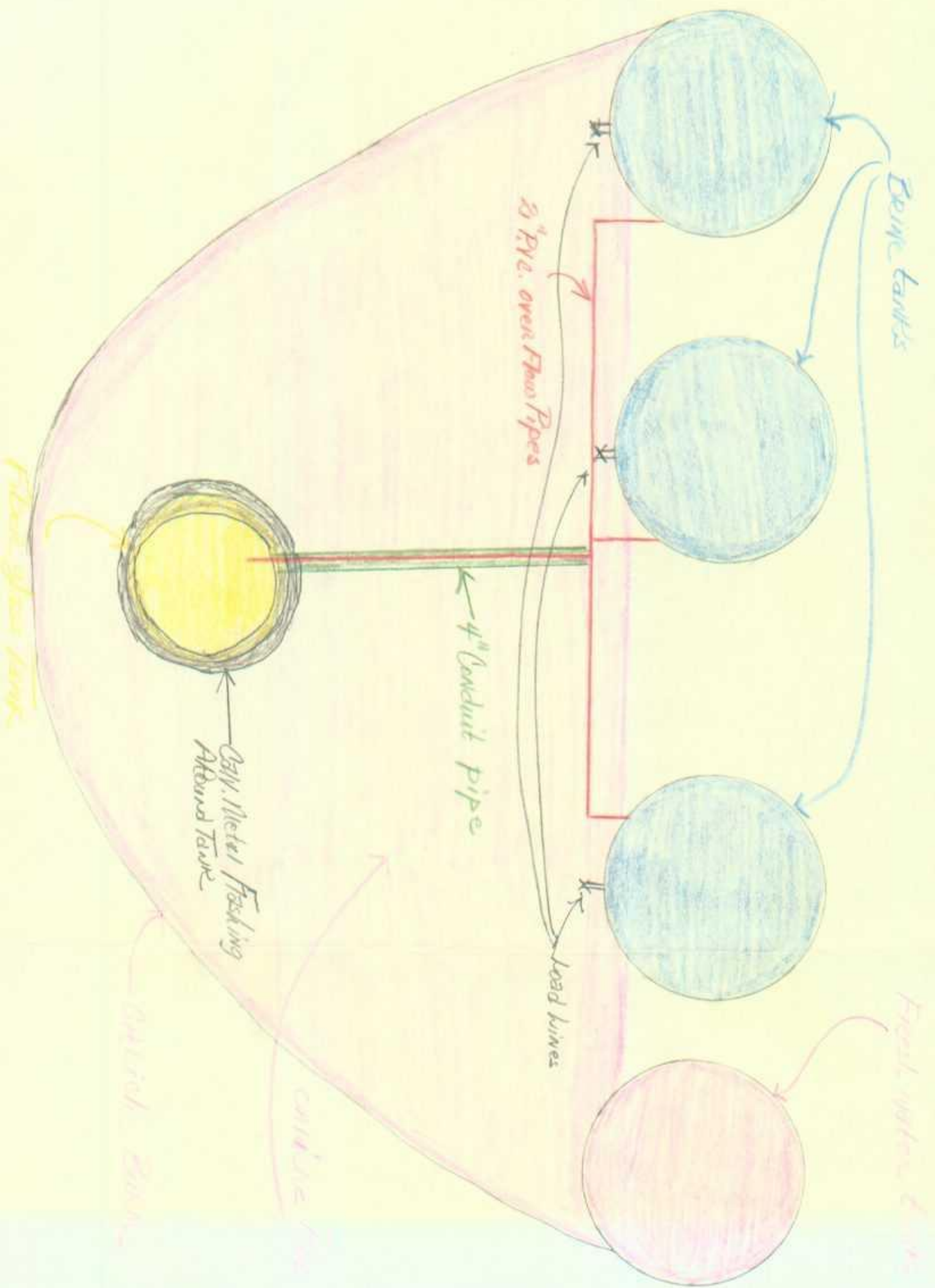


Paul D. Prather

PDP:js  
Enc/5

P+S. BRINE







Iron Steel Bridge Tank

3" P.V.C. overflow lines

4" conduit pipe

1' foot collapse

3' foot Top Soil

collapse to Red Bed

Red Bed to Soft Section

Load lines

Concrete Fiberglass Tank

Fence Around Tank

Galv. Metal Flashing around Tank

12" Grade to Drain to 13'

Drain



**PARABO, Inc.**P. O. BOX 1737  
EUNICE, NEW MEXICO 88231

Nº 13198

Date 12-23-85  
Company Chaparral Brine St  
Address \_\_\_\_\_  
\_\_\_\_\_  
Bbls. Production Water  
Bbls. B S & W  
Bbls. Solids  
Remarks 12 Gals  
\_\_\_\_\_  
\_\_\_\_\_  
Truck No. \_\_\_\_\_  
Lease Name \_\_\_\_\_  
Accepted by [Signature]  
Company Representative

**PARABO, Inc.**P. O. BOX 1737  
EUNICE, NEW MEXICO 88231

Nº 13199

Date 2-23-85  
Company Chaparral Brine St  
Address \_\_\_\_\_  
\_\_\_\_\_  
Bbls. Production Water  
Bbls. B S & W  
Bbls. Solids  
Remarks 12 Gals  
\_\_\_\_\_  
\_\_\_\_\_  
Truck No. \_\_\_\_\_  
Lease Name \_\_\_\_\_  
Accepted by [Signature]  
Company Representative

24 yards Wiley Dirt Hauled to Parabos -



Fiberglass  
Tank  
Manufacturers

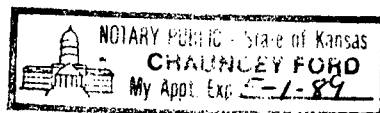


Route 2 - Box 147  
Ellinwood, Ks. 67526  
(316) 564-2502

January 13, 1986

This is to certify that Glasco Tank  
Company, Inc. tanks will not leak,  
and are free of defects.

*Sam Casey*  
Sam Casey  
President



*Chauncey Ford*



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

**TONEY ANAYA**  
**GOVERNOR**

**DENISE D. FORT**  
**DIRECTOR**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 1985

P&S Brine Sales  
P.O. Box 1768  
Eunice, New Mexico 88231

Dear Sir:

Enclosed is a copy of the public notice pertaining to your proposed discharge which was issued by this division pursuant to New Mexico Water Quality Control Commission Regulations, Section 3-108.

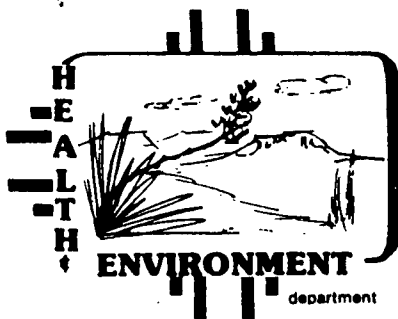
If you have any questions, please do not hesitate to contact me at the above address and telephone number (ext. 279).

Sincerely,

Ron C. Conrad  
Program Manager  
Ground Water Section

• RCC/mp

Enclosure



TONY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR

**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 1985

Board of County Commissioners  
County of Lea  
Lea County Courthouse  
Hobbs, New Mexico 88240

Board of County Commissioners:

Enclosed is a public notice which includes notice of proposed discharge plan(s) for one or more operations located in your county.

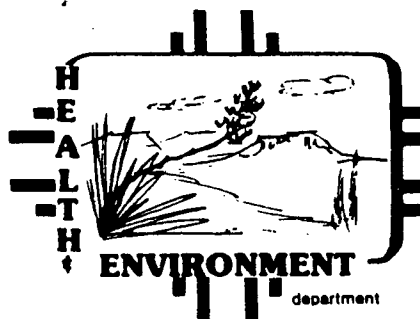
If you have any questions, please do not hesitate to contact me at the address and telephone number given above.

Sincerely,

Ron C. Conrad  
Program Manager  
Ground Water Section

RCC/mp

Enclosure



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

**TONEY ANAYA**  
**GOVERNOR**

**DENISE D. FORT**  
**DIRECTOR**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 20, 1985

The Honorable Bill Waldrap, Mayor  
City of Hobbs  
P.O. Box 1117  
Hobbs, New Mexico 88240

Dear Mayor Waldrap:

Enclosed is a public notice which includes notice of a proposed discharge plan(s) for one or more operations in or near your city.

If you have any questions, please do not hesitate to contact me at the above address and telephone number (ext. 279).

Sincerely,

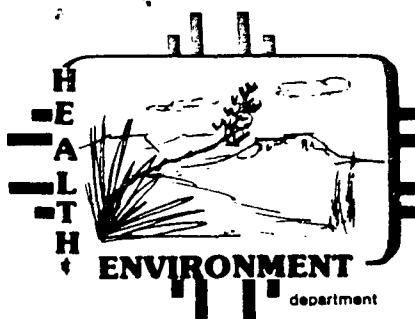
Ron C. Conrad  
Program Manager  
Ground Water Section

RCC/mp

Enclosure

TONY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

December 20, 1985

ALBUQUERQUE JOURNAL  
P.O. Drawer J  
Albuquerque, New Mexico 87103

Attention: LEGAL ADVERTISING

Dear Sir or Madam:

Please publish the enclosed public notice concerning discharge plan(s)  
in the classified legal section of the Albuquerque Journal on or before  
December 30, 1985.

Send your statement and two (2) copies of the Affidavit of Publication  
to me at the above address.

Thank you.

Sincerely,

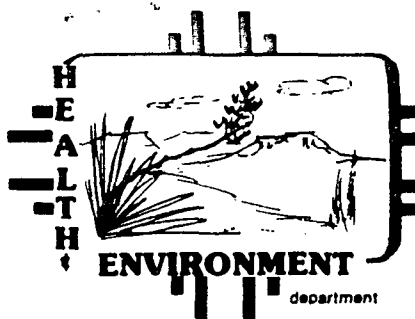
*Kent Postrik*

Ron C. Conrad *for*  
Program Manager  
Ground Water Section  
RCC/mp

Enclosure

TONY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

December 20, 1985

Hobbs News-Sun  
201 North Thorp  
Hobbs, New Mexico 88240

Dear Sir or Madam:

Please publish the enclosed public notice concerning discharge plan(s) in the classified legal section on or before December 30, 1985.

Send your statement and two (2) copies of the Affidavit of Publication to me at the above address.

Please print only the section(s) highlighted in yellow.

Thank you.

Sincerely,

Ron C. Conrad  
Program Manager  
Ground Water Section

RCC/mp

Enclosure

DECEMBER 20, 1985

TO BE PUBLISHED ON OR BEFORE DECEMBER 30, 1985

**PUBLIC NOTICE**

**NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION**

Notice is hereby given that, pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the New Mexico Environmental Improvement Division, P.O. Box 968, Santa Fe, New Mexico 87504-0968; telephone (505) 827-2906.

(DP-162) JIM RICHARDSON DAIRY d/b/a Yorktown Dairy, Jim Richardson, owner, Rt. 2 Box 85H, Roswell, New Mexico 88201, proposes to renew the discharge plan for the disposal of wastewater from a 800 cow dairy located south of Roswell in Section 19, T11S, R25E, Chaves County. Milking center wastewater, which averages 15,000 gallons per day, is land applied to 134 acres of cropland. The ground water most likely to be affected is at a depth of approximately 21 feet with a total dissolved solids content of approximately 2500 mg/l.

(DP-319) P&S BRINE SALES, P.O. Box 1768, Eunice, New Mexico 88231, has submitted an amendment to the discharge plan for their brine extraction well and associated surface facilities located in the SW 1/4, SE 1/4, Section 34, T21S, R37E, just south of Eunice in Lea County, New Mexico. Brine is manufactured by means of an injection well drilled to a total depth of about 1900 feet. Fresh water purchased from the City of Eunice is injected through the casing-tubing annulus into the dry salt beds of the Salado Formation, and the resulting dense brine (339,000 mg/1TDS) is brought to the surface and stored in three 1000-barrel tanks for sale to tank trucks on demand. Injection volume averages 212,735 barrels per year. The proposed modification to this operation consists of installing a lined emergency spill catchment pit, paving the truck loading area to cause all spillage to flow to the lined catchment, and taking other measures to prevent ground water contamination from surface activities. Ground water most likely to be affected by this operation is at a depth of approximately 45 feet and has a TDS content of about 1000 to 1400 mg/l.

Any interested person may obtain further information from the Ground Water Section, Ground Water/Hazardous Waste Bureau, EID, and may submit written comments to the Director of the EID at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of EID will allow thirty (30) days after the date of publication of this Notice during which comments may be submitted to her and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why the hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

TONEY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

December 6, 1985

Paul D. Prather  
P&S Brine Sales  
PO Box 1768  
Eunice, NM 88231

Dear Mr. Prather:

Thank you for responding promptly to Mr. Perkins' letter of November 14th. With regard to your proposed amendment to discharge plan DP-319 for the P&S Brine Station: your plans appear generally adequate. Please confirm in writing that in carrying out your modification you will do the following:

Notify the EID at least one week before beginning excavation of the contaminated dirt and other construction.

Excavate the pit to a depth at which the soil has no detectable petroleum odor.

Identify an approved site for disposal of the contaminated dirt and, later, fluids to be pumped out of the fiberglass tank.

Certify that the tank does not leak ( submit an affidavit of a test for leakage, a manufacturer's guarantee, or some similar proof).

Insure that the caliche pad is graded in such a way as to deliver all spillage to the tank. In particular, be sure to lay flashing between the lip of the tank and the caliche pad, or make other appropriate arrangements, so that no spillage is allowed to seep into the gap between tank and pad.

Berm the earth around the sides of the buried tank in such a way as to limit the amount of rainfall runoff that can flow into the tank. This will help to prevent the tank's overtopping during an extreme rainstorm before you can get to the tank to pump it out.

Please provide me with a date by which you believe you can carry out the modification of your facilities described in your discharge plan amendment.

The EID is required to publish public notice of a discharge plan amendment . This notice must be published within thirty days of receipt of an amendment - in your case, no later than January 4, 1986. Following publication, we must allow 30 days for public comment before making any final decision to approve or disapprove a discharge plan or amendment thereto. Therefore, I will not be able to recommend



formal approval of your plans until some time in late January or early February. However, I strongly recommend that you take steps to remove the oil and contaminated soil from the pit at the brine station as soon as possible, notifying EID before you do. This step could only be viewed positively, even without formal approval.

Again, thank you for your readiness to correct the environmental problems at P&S Brine Station.

Sincerely,

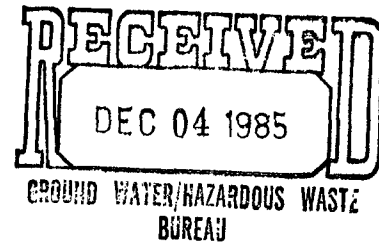


Paige Grant Morgan  
Water Resource Specialist  
Ground Water Section

PGM:pgm

cc: John Guinn, EID District IV Manager.

P & S BRINE SALES  
P. O. Box 1768  
Eunice, New Mexico 88231  
505-394-2545



December 2, 1985

Environmental Improvement Division  
P. O. Box 968  
Santa Fe, New Mexico 87504-0968

Attention: Paige Grant Morgan

Dear Ms. Morgan:

In response to your letter of November 14, I would like to submit to you the following list of amendments to our discharge plant:

- I. Dig out and replace all contaminated dirt.
- II. Bury 200 barrel fiberglass open top tank, ground level to catch all run off.
- III. Lay overflow line from tank to open top tank.
- IV. Build sloped pad with caliche from storage tanks to underground tank.

Should you have any other suggestions as to what we might do to improve this location, please advise.

Yours very truly,

P & S BRINE SALES

A handwritten signature in cursive script, reading "Paul D. Prather".

Paul D. Prather  
Partner

PDP:js



TONY ANAYA  
GOVERNOR

DENISE D. FORT  
DIRECTOR

**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 14, 1985

Paul D. Prather  
P&S Brine Sales  
PO Box 1768  
Eunice, NM 88231

Re: DP-319: Discharge Plan for P&S Brine Sales, Eunice, New Mexico

Dear Mr. Prather:

You were notified in a letter from Paige Grant of the EID staff on February 9, 1984, that the operation of your above-referenced brine station would be reviewed as time allowed, to see that it was in compliance with Section 3 of the New Mexico Water Quality Control Commission (WQCC) regulations under which it was permitted by the Oil Conservation Division.

On November 11, 1985, Paige Grant Morgan and Steven Sares made an inspection of the surface facilities at your brine station and discovered the following conditions:

- 1) A shallow unlined pit full of oil which appeared to have been intentionally dumped rather than spilled during brine loading.
- 2) An unlined ditch into which brine drains periodically by means of overflow pipes from the brine storage tanks. Oily residue was also noted in this ditch.
- 3) No arrangements made in anticipation of spillage or leakage of brine, oil or other water contaminants at the facility to prevent their infiltrating to ground water and impairing its quality.

Therefore, pursuant to Section 3-109.E of the WQCC regulations, you are required to submit to this office within 45 days of receipt of this letter an amendment to your discharge plan which addresses the above concerns. Once your amendment is approved, you will have a specified amount of time in which to carry out the necessary construction to bring this facility into compliance with Part 3 of the WQCC regulations.

Be advised that you may choose at this time to prepare an amended discharge plan pursuant to Part 5 of the WQCC regulations, instead of Part 3 alone. This would be

required in any case when you apply for a renewed permit to operate in 1987, when your present discharge plan expires. I have enclosed an outline for a Part 5 discharge plan, to give you an idea of what is entailed. Some of the required information already exists in your file from your previous submittals, and need not be duplicated.

Whether you choose to submit an amendment covering only those violations noted above, or choose to prepare a complete Part 5 discharge plan amendment/renewal at this time, if we do not receive an adequate response to this letter within 45 days, the director of EID may terminate the discharge plan approval under which you are operating (see Section 3-109.E.2). You are reminded that, pursuant to Section 5-101.B.3, it is unlawful to operate an injection well in the state of New Mexico without an approved discharge plan.

Please contact Paige Grant Morgan at 827-2901 or at the address given in the letterhead, if you have any questions on the contents of this letter.

Sincerely,



Richard Perkins  
Acting Bureau Chief  
Ground Water/Hazardous Waste Bureau

RP:PGM:pgm

cc: John Guinn, EID District IV Manager

CHECK ONE:

☒ LETTER TO P&S Brune Sales  
for Perkins' signature

☐ MEMO TO \_\_\_\_\_

☐ PRESS RELEASE

☐ OTHER

SUBJECT: DP amendment required

DRAFTED BY: Jane Morgan

(Date)

CONCURRENCES:

NAME:

INITIAL

DATE  
REC'D

DATE  
APPROVED

R. Conrad

Sect. Mgr.

RL

11/14/85

11/14/85

Bur. Chief

BB

11/15

Richard Holland

Dep. Dir.

Denise Fort

Director

FINAL DECISION NEEDED BY

ASAP  
(date)

BECAUSE

it's so

hard to get word processor done to change date!

COMMENTS BY DRAFTER OR REVIEWER(S):

PT 5 Brine Sales

Sec 34, T21-S R 37E L6A.

PH 505-394-2545

Neon Eunice

PAUL D. PRATHER

- 1 Dirt Pit to catch overflow. ch out
  - 2 ch set brine tanks + liners 3
  - 3 loading area + relation to spill sump (dirt pit)
  - 4 No mention of KC Holding Tank in schematic  
What is KC
  - 5 No pit of brine overflow pit  
- look for sump truck
-

No. of

Samples Ion

FIELD TRIP REPORT  
GROUND WATER SECTION

## SLD USER CODES

County Lea

Ground Water: 59300

NO<sub>3</sub>, HC, & Toxics: 59600

UIC: 59500

## FACILITY VISITED

Name of Facility: *P & S Brine Station*Location: *just north of gas plant in Eunice*

Discharge Plan Number: DP- 319

Type of Operation: *brine extraction well; brine sales*

## ENVIRONMENTAL IMPROVEMENT DIVISION FIELD VISIT

EID Inspector(s): *Sares, Morgan*Date of Inspection or Visit: *11/11/85*

Discharger's Representative Present During EID Visit:

Name: *NONE*

Title or Position:

Purpose of Visit:

a. Evaluation of Proposed Discharge Plan \_\_\_\_\_

b. Compliance Inspection of Discharge with Approved Plan X

c. Other (specify) \_\_\_\_\_

Inspection Activities During Field Visit:

a. Inspection of Facilities or Construction (specify)

*General housekeeping inspection.*

b. Sampling of Effluents (give sampling locations)

c. Sampling of Ground Water (give names or locations of wells)

d. Evaluation of geology, soils, water levels or other physical characteristics of the location (specify)

e. Other (specify)

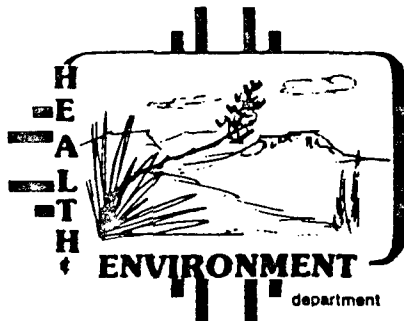
## Observations and Information Obtained during the Visit:

*Pit in front appears to be used intentionally for dumping of oil: there is no evidence of runoff into the pit during filling of trucks, rather it appears that the trucks probably dump their oil first before loading brine.*

*Ditch behind tanks is used to catch overflow from brine tanks. Also contains some oil. Well appears to be hooked up correctly to run water down annulus.*

## ACTION REQUIRED

*Require modification.*



**STATE OF NEW MEXICO**

**ENVIRONMENTAL IMPROVEMENT DIVISION**  
P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

Steven Asher, Director

TONEY ANAYA  
GOVERNOR

ROBERT McNEILL  
SECRETARY

ROBERT L. LOVATO, M.A.P.A.  
DEPUTY SECRETARY

JOSEPH F. JOHNSON  
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 9, 1984

Mr. Paul D. Prather  
P & S Brine Sales  
P.O. Box 1768  
Eunice, NM 88231

Dear Mr. Prather:

For your information, the responsibility for regulating brine extraction wells in the state of New Mexico was transferred in September, 1983 from the Oil Conservation Division (OCD) of the Energy and Minerals Department, to the Environmental Improvement Division (EID) of the Health and Environment Department.

The transfer will probably have no effect on your operation until 1986, when, if you plan to continue producing brine at your facility, you will need to start the process of applying for renewed approval of your discharge plan. Your present approval expires December 18, 1987, five years after the date the plan was approved.

At that time, you will need to prepare a discharge plan which includes the elements required under Section 5 as well as Section 3 of the Water Quality Control Commission (WQCC) Regulations (copy enclosed). Prior to December 20, 1982, a discharge plan consisted of only those elements listed in Section 3. Section 5 was added to the regulations in order to comply with federal Environmental Protection Agency (EPA) regulations to protect drinking water from pollution that might occur due to injection of fluids underground. The preparation of a Part 5 UIC application will require you to provide considerably more technical information than was needed for Part 3 discharge plan approval. It is for this reason that we recommend you begin to prepare your discharge plan renewal about eighteen months before the date that your current permit lapses. This should allow ample time for preparation, review, correction and final submittal of your new plan.

In the meantime, you are required to operate your facility in compliance with the standards of Section 3 of the WQCC Regulations. As time permits, we will



Mr. Prather  
February 9, 1984  
Page 2

undertake a review of your present discharge plan and your field operation, to assure that it meets those standards.

If you have any questions or require further information, please contact me at the above address and telephone number (ext. 285).

Sincerely,



Paige Grant  
Hydrologist  
Ground Water Section

PG:egr

Enclosure

cc: John Guinn, EID District IV, Manager  
EID Field Office, Hobbs  
Joe Ramey, Director, OCD

MSH



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

December 18, 1982

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

P & S Brine Sales  
P.O. Box 1768  
Eunice, New Mexico 88231

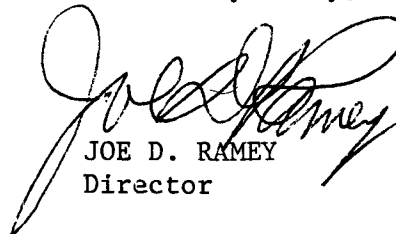
RE: GWB-7  
Discharge Plan

Gentlemen:

The discharge plan submitted for the brine production facility and in situ extraction well located in Section 34, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission regulations. It is approved pursuant to Section 109. Please note subsections 3-109E and 3-109.F which provide for possible future amendment of the plan. Please also be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Yours very truly,

  
JOE D. RAMEY  
Director

JDR/OS/dp

cc: Hobbs District Office

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION  
SANTA FE, NEW MEXICO

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-3260.

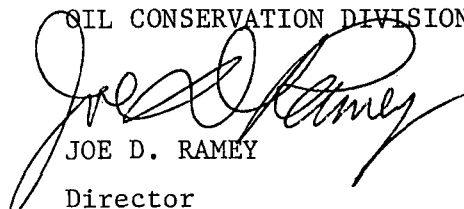
P and S BRINE SALES, P. O. Box 1768, Eunice, New Mexico 88231, telephone (505) 394-2545, requests approval of their discharge plan for their brine in situ extraction well and facility located in Section 34, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. P and S Brine Sales injects water down their injection well to an underlying salt formation thereby dissolving the salt, forming a brine water solution with a total dissolved solids content of approximately 300,000 mg/L. P and S Brine Sales extracts and sells the brine water solution to various companies for use in oil and gas production.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

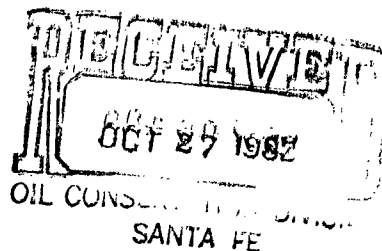
GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of November, 1982.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
JOE D. RAMEY  
Director

S E A L

P & S BRINE SALES  
P. O. Box 1768  
Eunice, New Mexico 88231



October 26, 1982

State of New Mexico Energy & Minerals Dept.  
Oil Conservation Division  
P. O. Box 2088  
State Land Office Building  
Santa Fe, New Mexico 87501

Attention: Mr. Oscar Simpson III

Dear Sir:

Attached please find information which I hope will enable you to approve our brine station.

Should any further information be needed, please feel free to call me at 505-394-2545.

Yours very truly,

P & S BRINE SALES

Paul D. Prather  
Partner

PDP:js  
Enc/

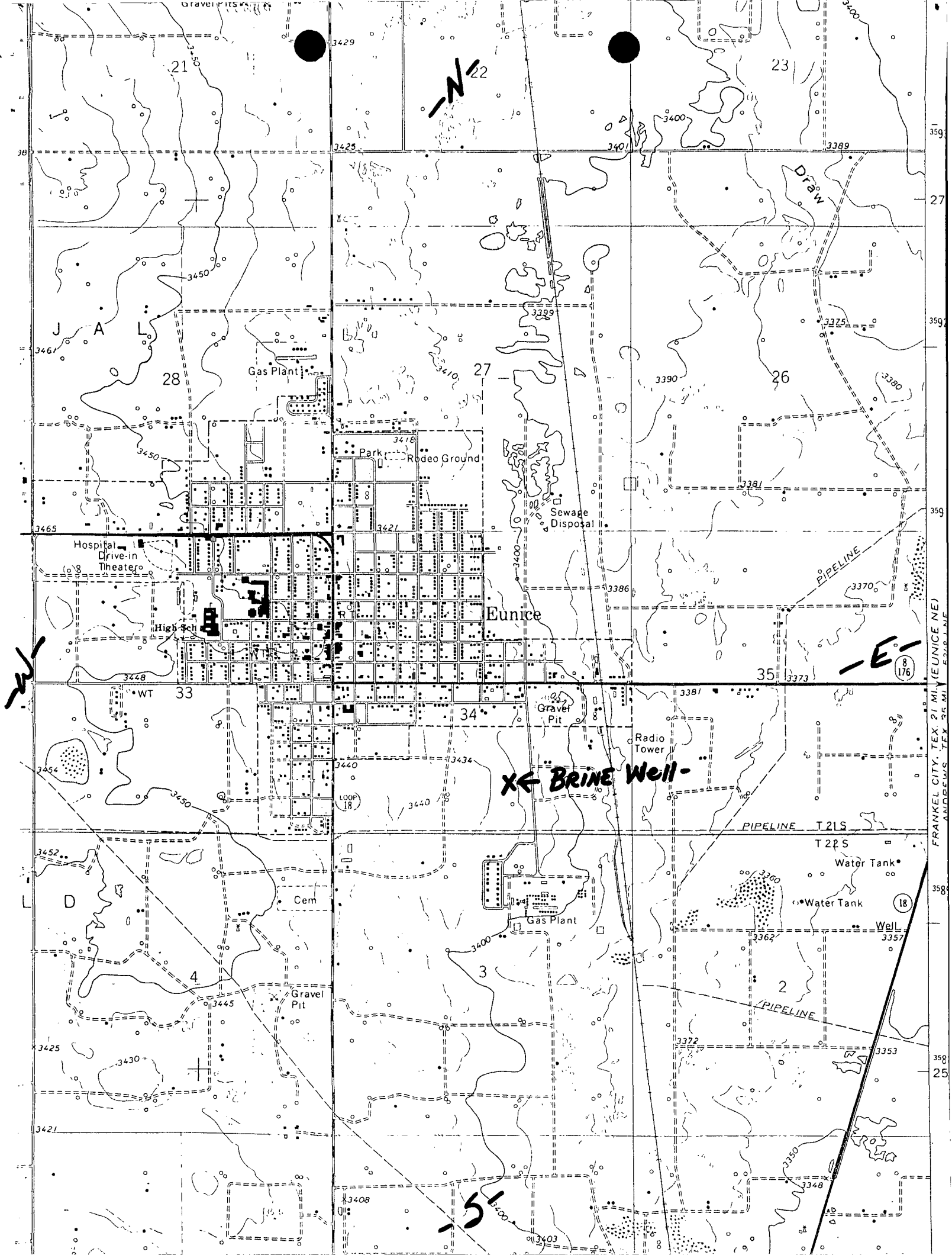
P & S BRINE SALES

Eunice, New Mexico

TOPOGRAPHIC MAP

-Location of Brine Well-

-/-



FRANKEL CITY, TEX 21 MI. (EUNICE NE)  
ANDREWS, TEX 25 MI. (EUNICE SE)

Elevation being 3,334 ft.

There is no flood hazard.



Water wells within a 2 mile radius:

See attached map:

# Water Wells Locations

X P42 EXHIBIT WELL -

Artificial Gulf Water Flood 930' to 1110'  
Gulf Wells (25-21-31 + 26-21-31) for Plant 112E  
Domestic 90' to 120' 3 to 5 G.P.M. Brackish

## Domestic Owners

Humble Oil Co (EXXON)	Sec. 3-22-37
Willie Bettis	Sec. 33-22-37
Nix Osborn	Sec. 4-22-37
C. H. Bettis	Sec. 9-22-37
PAT Sims	Sec. 33-21-37
Millard Deck	Sec. 28-21-37
Richard Robinson	Sec. 34-21-37
Nadine Owens	Sec. 35-21-37
Bobby Wallack	Sec. 36-21-37
Humble Oil Co. (EXXON)	Sec. 2-22-37
Percilla Brunson	Sec. 10-22-37
Dickie Roberson	Sec. 27-21-37
GRANT Culver	Sec. 27-21-37

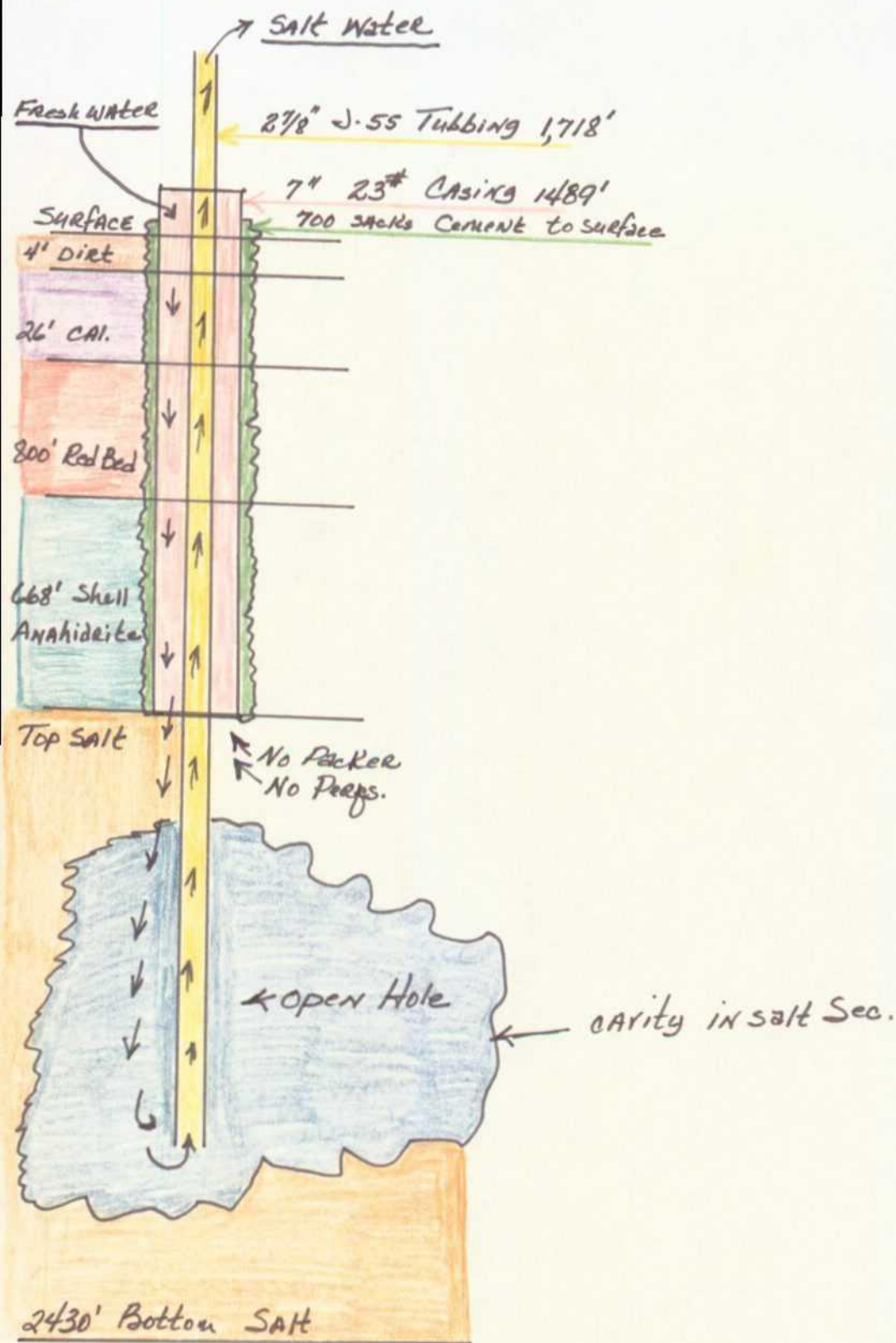
See Attached Map on

PAGE 3

Water well owners, depth, quantity & quality.

See attached page:

Detailed schematic diagram of brine well:



Fresh water is pumped down casing All Time to Keep salt from eating up casing. Salt water comes out Tubbing.

1,718' 2 7/8" J-55 Tubbing none coated

1,489' 7" 23# casing

- (A) 4' Dirt & Sand  
26' Caliche  
800' Red Bed  
668' Shale & Anhydrite
- (B) Top of Salt Section - 1,489 Ft.
- (C) Cemented with 400 sacks of Halliburton Light  
with 15 lbs. salt and  $\frac{1}{4}$  lb. Flocele per sack,  
followed by 300 sacks of Class C"C with 2%  
 $\text{CaCl}_2$ .  
  
Cemented from top of salt section to top of  
surface.

-SUPPLY WATER ANALYSIS-

See attached pages:



State of New Mexico  
HEALTH and ENVIRONMENT DEPARTMENT  
SCIENTIFIC  
LABORATORY DIVISION

CHEMICAL and PHYSICAL ANALYSES  
for WATER SAMPLES

Date received  
7/2/01

Lab No.  
0000074

SLD user code No.

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis  
(Mark appropriate box(es))

INTERIM PRIMARY PARAMETER GROUP  
☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS  
☐ Complete-Secondary

☐ Organic

☐ Radiological

Water Supply System Name

Water Supply System Code No.

City or Location

County

Check one:

☐ TREATED WATER

☐ RAW WATER

Collection Date

Collection Time

Collector's remarks

Report to

Collected By

Owner

Address

TYPE of SYSTEM (Check one)

☐ PRIVATE ☐ PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other (specify)

LAT.

LONG

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	HEAVY METALS	mg/l	PARAMETER	ORGANIC	mg/l
00930 Sodium (as Na)	36.8	00940 Chloride (as Cl)	345	70300 Total Filterable Residue	01000 Arsenic			39390 Endrin	
00935 Potassium (as K)	234	00950 Fluoride (as F)	106	38260 F. foaming Agents (as Las)	01005 Barium			39732 Lindane	
00900 Tot. Hardness (as CaCO <sub>3</sub> )	217	00620 Nitrate (as N)		00095 Conductance Micromhos 25°C	01025 Cadmium			38270 Methoxychlor	
00915 Calcium (as Ca)	67.6	00430 Alkalinity (as CaCO <sub>3</sub> )	173	00400 pH	01030 Chromium			39400 Toxaphene	
00925 Magnesium (as Mg)	11.7	00440 Bicarbonate (as HCO <sub>3</sub> )	211.4	01330 Odor	01049 Lead			39730 2,4-D	
01045 Iron-Total (as Fe)	4025	00445 Carbonate (as CO <sub>3</sub> )	0.0	00080 Color	07180 Mercury			39740 2,4,5-TP (Silvex)	
01056 Manganese (as Mn)	4005	00945 Sulfate (as SO <sub>4</sub> )	62.8	00070 Turbidity	01145 Selenium				
					01075 Silver				

LABORATORY REMARKS:

HOBBBS OFFICE

Reviewed by

Date reported





State of New Mexico  
HEALTH and ENVIRONMENT DEPARTMENT  
SCIENTIFIC  
LABORATORY DIVISION

# CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received

7/2/81

Lab No.

600605

SLD user code No.

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis  
[Mark appropriate box(es)]

INTERIM PRIMARY PARAMETER GROUP  
☐ 1 ☐ 2 ☐ 3 ☐ Complete Secondary

☐ Organic

☐ Radiological

Water Supply System Name

Water Supply System Code No.

City or Location

County

Check one:

☐ TREATED WATER ☐ RAW WATER

Collection Date

Collection Point

Collector's remarks

Report to

Collected By

Owner

Address

TYPE of SYSTEM (Check one)

☒ PRIVATE ☐ PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth

☐ Drain ☐ Stream ☐ Pool ☐ Other (specify)

LAT.

LONG

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	HEAVY METALS	mg/l	PARAMETER	ORGANIC	mg/l
00930 Sodium (as Na)	4114	00940 Chloride (as Cl)	342	70300 Total Filterable Residue	01000 Arsenic			39390 Endrin	
00935 Potassium (as K)	234	00950 Fluoride (as F)	092	38260 Foaming Agents (as LaS)	01005 Barium			39732 Lindane	
00900 Tot. Hardness (as CaCO <sub>3</sub> )	215	00620 Nitrate (as N)		00095 Conductance Micromhos 25°C	01025 Cadmium			38270 Methoxychlor	
00915 Calcium (as Ca)	686	00430 Alkalinity (as CaCO <sub>3</sub> )	188	00400 pH	01030 Chromium			39400 Toxaphene	
00925 Magnesium (as Mg)	106	00440 Bicarbonate (as HCO <sub>3</sub> )	2296	01330 Odor	01049 Lead			39730 2,4-D	
01045 Iron-Total (as Fe)	2025	00445 Carbonate (as CO <sub>3</sub> )	00	00080 Color	07180 Mercury			39740 2,4,5-TF (Silver)	
01056 Manganese (as Mn)	2005	00945 Sulfate (as SO <sub>4</sub> )	628	00070 Turbidity	01145 Selenium				
					01075 Silver				

LABORATORY REMARKS:

JUL 28 1981

HOBBS OFFICE

Reviewed by

Date reported

# CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

CONSULT SIDA Lab Annex 1 for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

**CHEMICAL ANALYSES:** Check individual items for analysis  
[Mark appropriate box(es)]

INTERIM PRIMARY PARAMETER GROUP	TYPE of CHEMICAL ANALYSIS
<input type="checkbox"/> 1	<input type="checkbox"/> Complete
<input type="checkbox"/> 2	<input checked="" type="checkbox"/> Secondary
<input type="checkbox"/> 3	<input type="checkbox"/> Complete

☐ Organic☐ Radiological

Water Supply System Name	Water Supply System Code No.

City or Location

County

**Check one:**  
☐ TREAT

☐ RAW WATER

Collection Date	Collection Time
-----------------	-----------------

Collection Point # 7

Collector's remarks

## Report to

Collected By	Owner
--------------	-------

Owner

TYPE of SYSTEM (Check one)

PRIVATE ☒ PUBLIC: ☐ Community ☐ Non-community

**SOURCE:** ☐ Spring ☐ Lake ☐ Well-Depth -----  
☐ Drain ☐ Stream ☐ Pool ☐ Other (specify) \_\_\_\_\_

LAT.	0					
LONG	0					

CATIONS		mg/l	ANIONS		mg/l	PHYSICAL		HEAVY METALS		mg/l	PARAMETER	ORGANIC		mg/l
00930 Sodium (as Na)		39.1	00940 Chloride (as Cl)		33.1	70300 Total Filterable Residue	mg/l	01000 Arsenic				39390 Endrin		
00935 Potassium (as K)		234	00950 Fluoride (as F)		100	38260 Foaming Agents (as Las)		01005 Barium				39732 Lindane		
00900 Tot. Hardness (as CaCO <sub>3</sub> )		215	00620 Nitrate (as N)			00095 Conductance Micromhos 25°C		01025 Cadmium				38270 Methoxychlor		
00915 Calcium (as Ca)		682	00430 Alkalinity (as CaCO <sub>3</sub> )		182	00400 pH		01030 Chromium			RADIOLOGICAL 01501 Gross Alpha	39400 Toxaphene		
00925 Magnesium (as Mg)		109	00440 Bicarbonate (as HCO <sub>3</sub> )		222.0	01330 Odor		01049 Lead			03501 Gross Beta	39730 2, 4-D		
01045 Iron-Total (as Fe)		<0.25	00445 Carbonate (as CO <sub>3</sub> )		00	00080 Color	mg/l	07180 Mercury			03501 Radium-226	39740 2, 4, 5-TP (Silvex)		
01056 Manganese (as Mn)		40.05	00945 Sulfate (as SO <sub>4</sub> )		61.4	00070 Turbidity		01145 Selenium			11501 Radium-228			
								01075 Silver						

RECEIVED  
11 28 1981

LABORATORY REMARKS:

**HOBBS OFFICE**

Reviewed by

Date reported





State of New Mexico  
HEALTH and ENVIRONMENT DEPARTMENT  
SCIENTIFIC  
LABORATORY DIVISION

# CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: Check individual items for analysis (Mark appropriate box(es))

INTERIM PRIMARY PARAMETER GROUP

TYPE of CHEMICAL ANALYSIS

DATE received 7/1/81

Lab No. 810.0370

SLD user code No.

Water Supply System Name

Water Supply System Code No.

City or Location

County

Report to

Address

Check one:

TREATED WATER

RAW WATER

Collection Date

Collection Time

Collection Point

Collector's Remarks

Owner

Report to

Address

Check one:

TREATED WATER

RAW WATER

Collected By

Owner

Collection Point

Collector's Remarks

Owner

Report to

Address

Check one:

TREATED WATER

RAW WATER

TYPE of SYSTEM (Check one)

PRIVATE

PUBLIC: Community

Non-community

SOURCE:

Spring

Lake

Well-Depth

Other (specify)

LONG

LAT.

" "

CATIONS

mg/l

ANIONS

mg/l

PHYSICAL

HEAVY METALS

mg/l

PARAMETER

ORGANIC

mg/l

00930 Sodium (as Na)

43.7

00940 Chloride (as Cl)

88.9

70300 Total Filterable Residue

47.5

01000 Arsenic

mg/l

01005 Barium

39390 Endrin

39732 Lindane

38270 Methoxychlor

00935 Potassium (as K)

351

00950 Fluoride (as F)

0.96

38260 Foaming Agents (as Las)

4.005

01005 Barium

mg/l

01025 Cadmium

39730 2,4-D

39400 Toxaphene

00900 Tot. Hardness (as CaCO<sub>3</sub>)

278

00620 Nitrate (as N)

0.1

00095 Conductance Micromhos 25°C

712

01025 Cadmium

mg/l

01030 Chromium

01501 Gross Alpha

03501 Gross Beta

00915 Calcium (as Ca)

89.2

00430 Alkalinity (as CaCO<sub>3</sub>)

175

00400 pH

7.42

01030 Chromium

mg/l

01049 Lead

09501 Radium-226

03501 Gross Beta

00925 Magnesium (as Mg)

10.9

00440 Bicarbonate (as HCO<sub>3</sub>)

213.6

01330 Odor

0

01049 Lead

09501 Radium-226

03501 Gross Beta

01045 Iron-TOTAL (as Fe)

<0.25

00445 Carbonate (as CO<sub>3</sub>)

0.0

00080 Color

0

01045 Iron-TOTAL (as Fe)

09501 Radium-226

03501 Gross Beta

01056 Manganese (as Mn)

<0.05

00945 Sulfate (as SO<sub>4</sub>)

62.2

00070 Turbidity

0.2

01145 Selenium

11501 Radium-228

03501 Gross Beta

01056 Manganese (as Mn)

<0.05

00945 Sulfate (as SO<sub>4</sub>)

62.2

00070 Turbidity

0.2

01145 Selenium

11501 Radium-228

03501 Gross Beta

01056 Manganese (as Mn)

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11501 Radium-228

03501 Gross Beta

01056 Manganese (as Mn)

<0.05

00945 Sulfate (as SO<sub>4</sub>)

62.2

00070 Turbidity

-BRINE WATER ANALYSIS-

See attached page:

UNICHEM INTERNATIONAL

601 NORTH LEECH

P.O. BOX 1499

HOBBS, NEW MEXICO 88240

*PLS Brine Sales*

COMPANY :  
DATE : 10-25-82  
FIELD, LEASE & WELL : BRINE STATION P AND S BRINE  
SAMPLING POINT :  
DATE SAMPLED : 10-22-82

SPECIFIC GRAVITY = 1.229  
TOTAL DISSOLVED SOLIDS = 339024  
PH = 7.05

		ME/L	MG/L
<b>CATIONS</b>			
CALCIUM	(CA)+2	66.6	1336
MAGNESIUM	(MG)+2	323.	3930.
SODIUM	(NA).CALC.	5434.	124930.
<b>ANIONS</b>			
BICARBONATE	(HCO3)-1	2	122.
CARBONATE	(CO3)-2	0	0
HYDROXIDE	(OH)-1	0	0
SULFATE	(SO4)-2	182.	8750
CHLORIDES	(CL)-1	5640	199954.
<b>DISSOLVED GASES</b>			
CARBON DIOXIDE	(CO2)	NOT RUN	
HYDROGEN SULFIDE	(H2S)	0	0
OXYGEN	(O2)	NOT RUN	
IRON(TOTAL)	(FE)		3.1
BARIUM	(BA)+2	NOT RUN	
MANGANESE	(MN)	NOT RUN	

SCALING INDEX

TEMP

CARBONATE INDEX  
CALCIUM CARBONATE SCALING

30C  
86F  
-4.8  
UNLIKELY

SULFATE INDEX  
CALCIUM SULFATE SCALING

.339  
LIKELY

DETAILED FLOW DIAGRAM OF HOLDING FACILITIES:

See attached page:

# F. & S. Brine Storage

3" Load Valves

E-1

N

#1 - 1000 Bbl. Brine Tank w/ Rubber liner

#2 1000 Bbl. Brine Tank w/ Liner

#3 1000 Bbl. Brine Tank w/ Rubber liner

High Low Shut down Valve

3 1/2" X 6 Gaso Tey Plex Pump.

Dirt Pit to catch spills or overflow

High Low Shut down Valve

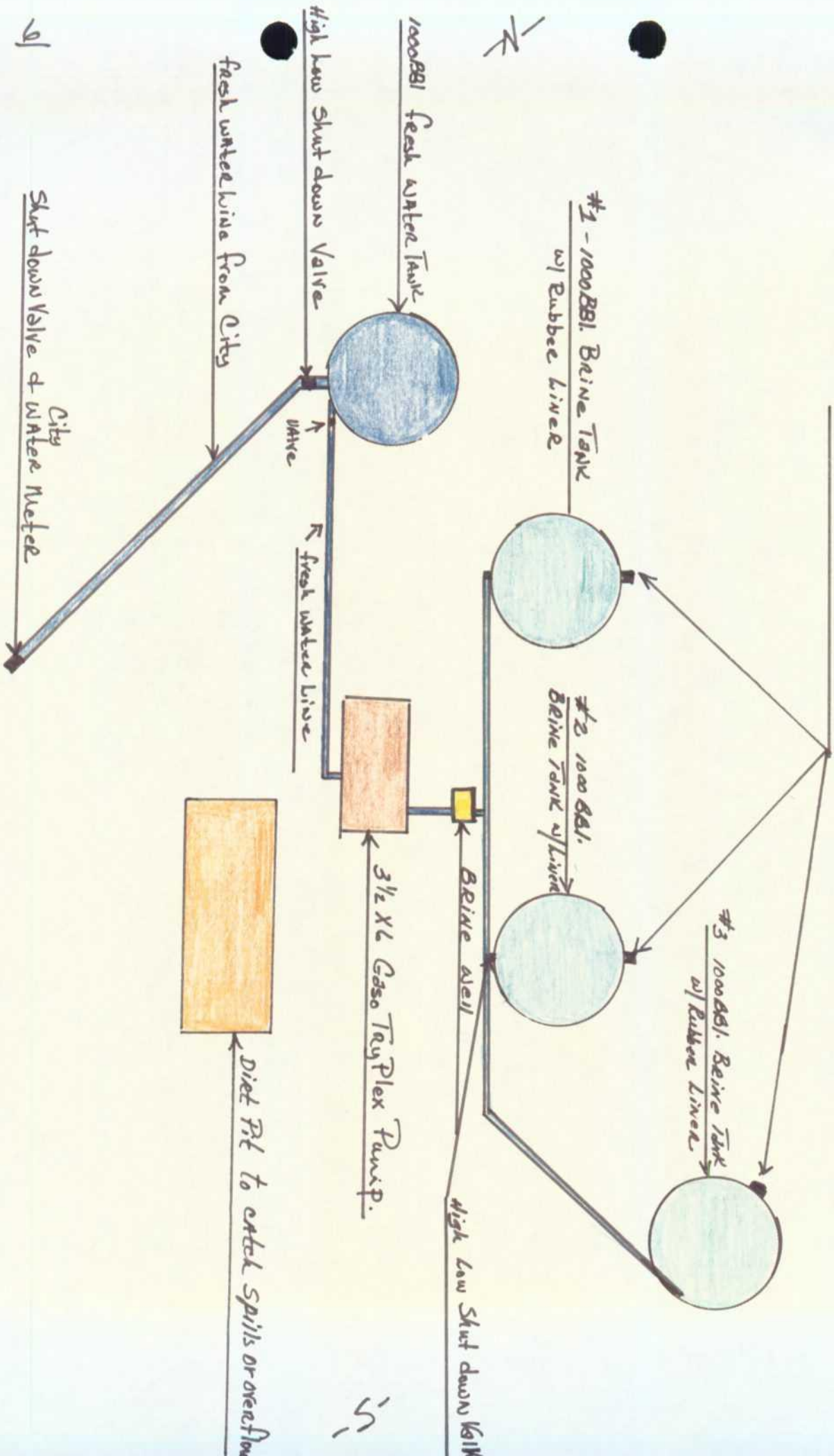
1000 Bbl fresh water Tank

fresh water line from City

Shut down Valve & water Meter City

M

S





NARRATIVE OF PAST WORKOVERS

YEARLY TOTALS OF BRINE PRODUCTION

HOLDING TANK, AGE, MATERIAL

MONITORING & INSPECTION SYSTEM

GROUND WATER CONDITION BENEATH FACILITY

METERING DEVICES

WATER QUALITY

PHOTOGRAPHS

See attached pages:

NARRATIVE OF PAST WORKOVERS:

None. This is a new well.

YEARLY TOTALS OF BRINE PRODUCTION:

July through December, 1980	125,145 Bbls.
January through December, 1981	361,466½ Bbls.
January through September, 1982	151,593 Bbls.
TOTAL	638,204½ Bbls.

212,735 ave

DETAILED INFORMATION ON HOLDING TANKS:

3 - 5 year old 1,000 bbl. steel bolted tanks with rubber liners.

MONITORING & INSPECTION SYSTEM:

Brine well is inspected twice daily by Mr. Prather & Mr. Stephens. Leakage or overflow drain into small working pit and is pickup up with the vacuum truck. No overflows because of high-low electrical switches.

GROUND WATER CONDITION BENEATH FACILITY:

State Engineering Dept. - 90' to 120' Ogulaula, fair.

METERING DEVICES:

City water meter for supply water.  
Sales tickets for brine sales.

WATER QUALITY:

Fresh water is injected into the ground only. No contaminated water is injected into the brine well at any time.

PHOTOGRAPHS:

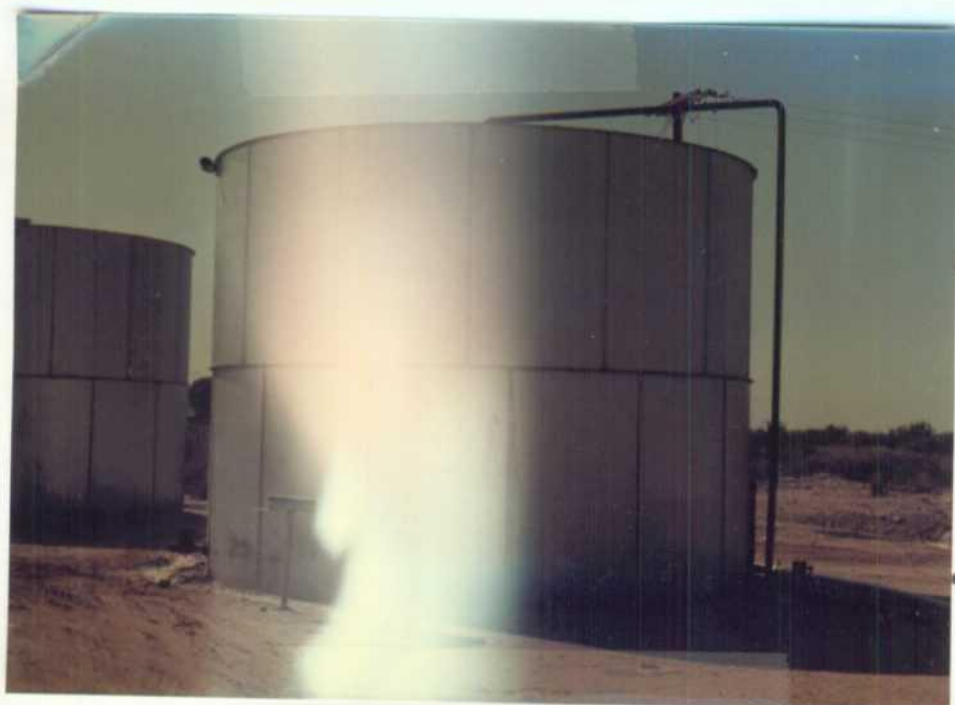
In order to keep any brine water from going back into the ground, we have a small working pit and have our own vacuum truck to pick up this water and put back into tanks. (See photographs)



- ← ORANGE TANK -  
Holding TANK for  
KC WATER
- ← Standby pump -
- ← pump house
- ← well head



- ← Fresh Water TANK
- ← Load Valve



← 1000 Bbl. Brine Tank

← 3" fill line

← Auto. Shut down Valve



← Brine Well head -

← Fresh water line

← Equalizer line to 3 Tanks

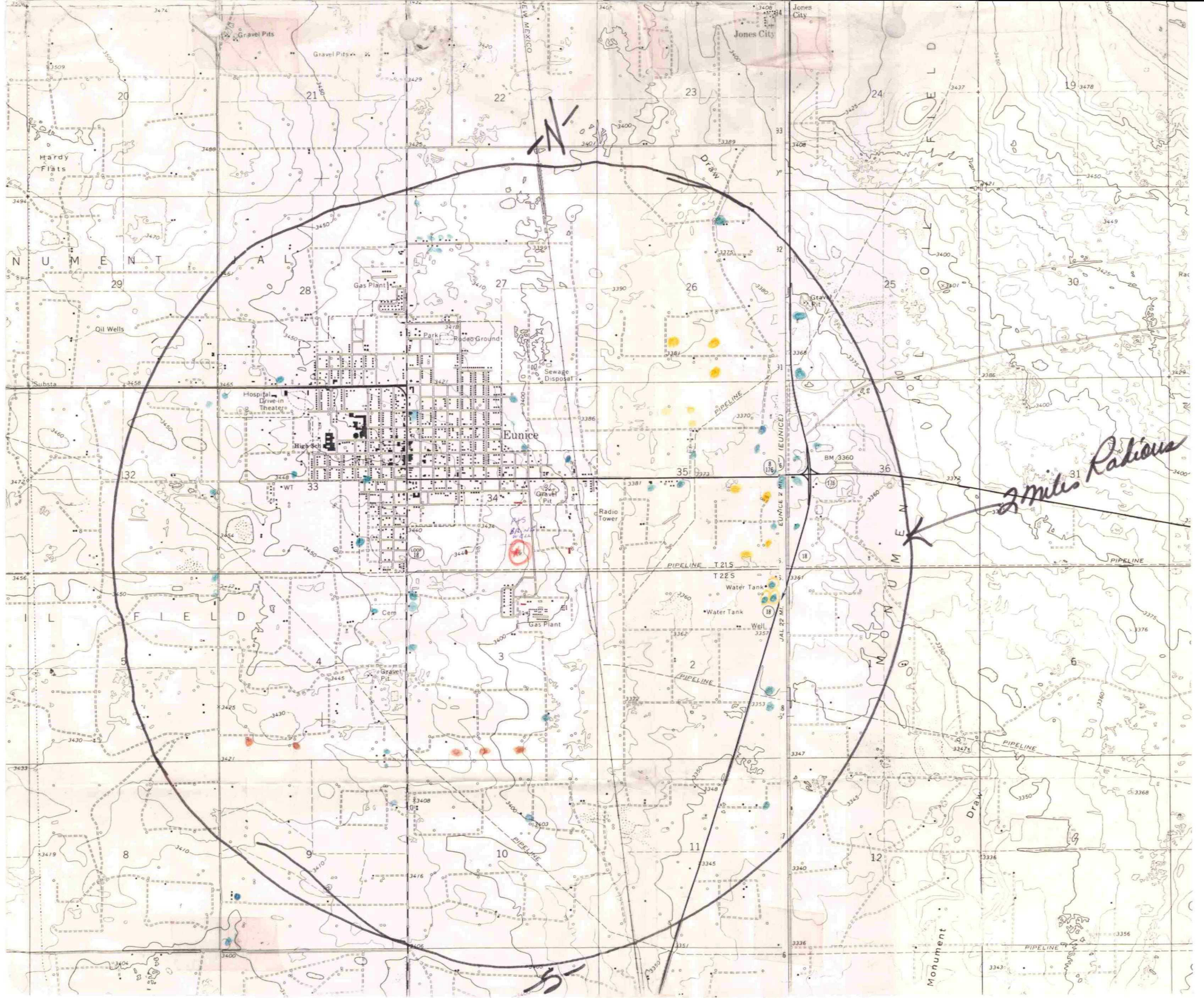
← Brine line to Tanks.

P+S. Brine Fac.



over flow pit.







## INJECTION WELL DATA SHEET

P.L.S. BRINE SALES

OPERATOR

LEASE

WELL NO.

FOOTAGE LOCATION

SECTION

TOWNSHIP

RANGE

SchematicTabular DataSurface CasingSize 7" Cemented with 700 sx.TOC Surface feet determined by 1489'Hole size 8 1/4"Intermediate Casing

Size \_\_\_\_\_ Cemented with \_\_\_\_\_ sx.

TOC \_\_\_\_\_ feet determined by \_\_\_\_\_

Hole size \_\_\_\_\_

Long string

Size \_\_\_\_\_ Cemented with \_\_\_\_\_ sx.

TOC \_\_\_\_\_ feet determined by \_\_\_\_\_

Hole size \_\_\_\_\_

Total depth \_\_\_\_\_

Injection interval\_\_\_\_\_ feet to open hole feet  
(perforated or open-hole, indicate which)Tubing size 2 7/8" lined with NONE set in a

(material)

Well head packer at NO packer feet.  
(brand and model)

(or describe any other casing-tubing seal).

Other Data1. Name of the injection formation SALT Section

2. Name of Field or Pool (if applicable) \_\_\_\_\_

3. Is this a new well drilled for injection? ☒ Yes ☐ No

If no, for what purpose was the well originally drilled? \_\_\_\_\_

4. Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail (sacks of cement or bridge plug(s) used) NO5. Give the depth to and name of any overlying and/or underlying oil or gas zones (pools) in this area. NONE

# DRILLING RECORDER

24

HOUR



24

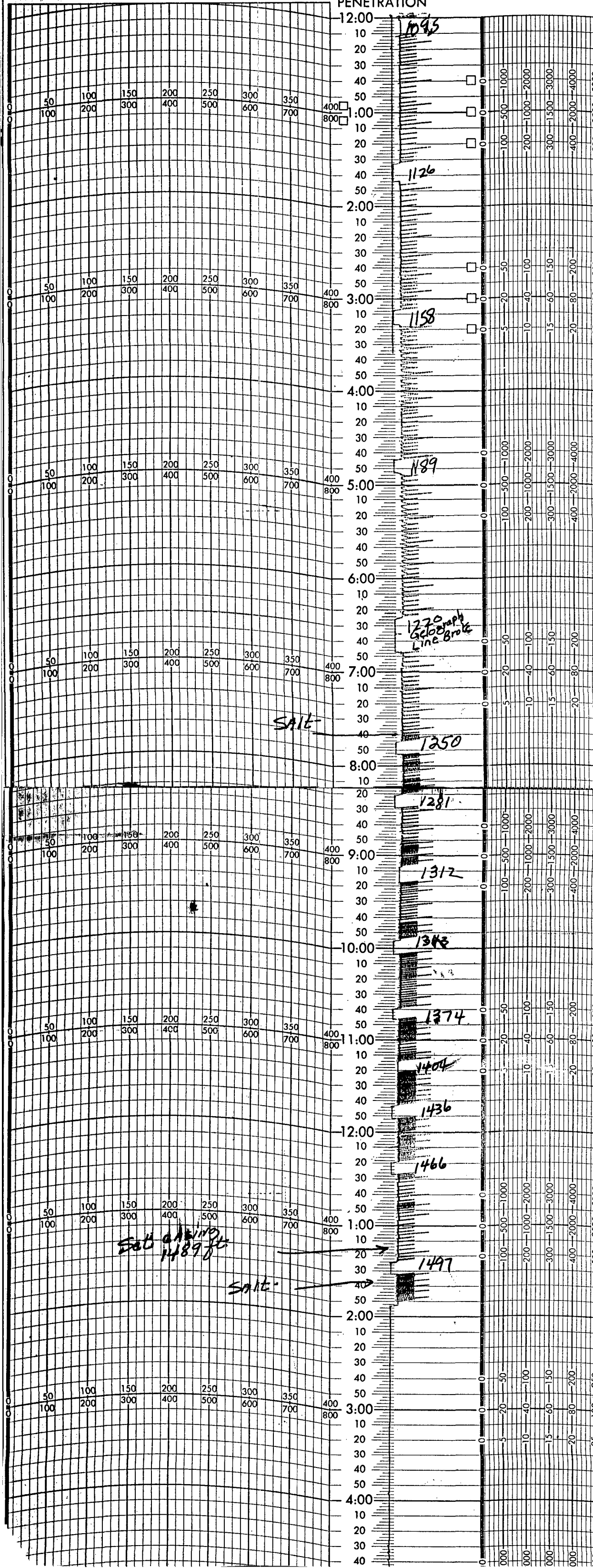
HOUR

OPERATOR: Bobber Well Servo #1  
 LOCATION: Pine Sales STATE: New Mexico  
 COUNTY: Lea T.D. OFF: 1521  
 DATE ON: 7-11-80 T.D. ON: 1095  
 FT. DRLD: \_\_\_\_\_

- ☐ FLUID PRESSURE
- ☐ PUMP STROKES
- ☐ TORQUE
- ☐ RPM
- ☐ % MUD FLOW
- ☐ % PIT LEVEL

WEIGHT IN 1000 POUNDS

PENETRATION







STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

October 7, 1982

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

P & S Brine Sales  
P.O. Box 1768  
Eunice, New Mexico 88231

ATTENTION: Paul D. Prather

RE: Discharge Plan for P & S  
Brine Sales Facility at  
Section 34, Township 21  
South, Range 37 East, NMPM,  
Lea County, NM

Dear Sir:

The Oil Conservation Division (OCD) received your discharge plan for your brine well located in Section 34, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico.

I have reviewed your plan and find that the following additional information is needed:

1. Submit a topographic map showing the location of your facility. Suggested Map; USGS Topographic Map, 7.5 minute series or equivalent.
2. Relate your facility to the topographic map in regards to any flooding potential of the site and if applicable, what precautions and methods are used to prevent such an occurrence.
3. Show the location of all water wells within a 2 mile radius of your facility on the topographic map. Submit detailed information on these water wells such as owner, purpose, depth, quantity, etc.
4. Submit a detailed schematic diagram of your brine well which illustrates:
  - (a) depths and tops of geologic formations penetrated, and general lithologic description of each.
  - (b) depth to top of salt section
  - (c) tops of cement and volume used
  - (d) Perforations, number of and depth of

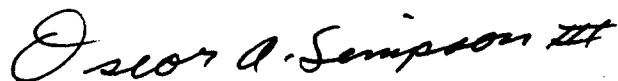
- (e) Casing and tubing - kind, weight, sizes
  - (f) Tubing - size, depth, and internal coating (if any)
  - (g) Packer description - depth of (if any)
  - (h) depth to top and bottom of fresh ground water - water of 10,000 mg/L or less.
  - (i) Fill out the attached sheet entitled, "Injection Well Data Sheet".
5. Attach chemical analysis of supply water and brine water produced with the following elements. Analyze for: (1) total dissolved solids (TDS), (2) chloride (CL), (3) Sulfates SO<sub>4</sub>, (4) PH (5) specific conductance, (6) specific gravity, (7) bicarbonate (HCO<sub>3</sub>) (8) Calcium (Ca), (9) Magnesium (Mg), (10) Total hardness Ca CO<sub>3</sub> (11) Sodium (12) Potassium (13) Iron (Fe), (14) Hydrogen Sulfate (15) Sulfides
  6. Submit a detailed flow diagram which illustrates the operation of how your supply water (water from Eunice Pipeline) is brought in, injected to make brine, stored, and loaded. Submit a narrative description of this process and how each stage is accomplished and controlled to prevent spillage and leakage. Submit photographs of each stage to further illustrate your narrative.
  7. Submit a narrative of past workovers done on your brine well if any. What type of mechanical integrity testing has been performed or intended to perform.
  8. Submit yearly totals of brine produced.
  9. Submit detailed information on holding tanks, age, material they are constructed of, and internal tank lining material if any.
  10. What monitoring or inspection system does your facility have for both ground water beneath your plant and the mechanisms of the brine facility. Or how is leakage or overflow of your brine facility handled and prevented.
  11. Submit detailed information on ground water conditions beneath your facility such as depth to ground water, name of ground water formation, chemical quality, etc.
  12. What type of metering devices are used on supply water and produced brine. Is there an accounting system used to keep track of supply water used versus brine water produced?

13. Please refer to the Water Quality Control Commission regulations Part III, Section 3-106 (C) - questions 1 through 8 and Section 3-107 A, C, and D for further guidance and requirements for discharge plans (pages 24 to 27).
14. Please elaborate in greater detail both with narrative description and photographs explaining the following:

In order to keep any brine water from going back into the ground, we have a small working pit and have our own vacuum truck to pick up this water and put it back into the storage tanks.

If you have any questions regarding this matter, please do not hesitate to call me at (505) 827-2534.

Sincerely,



Oscar A. Simpson, III  
Water Resource Specialist

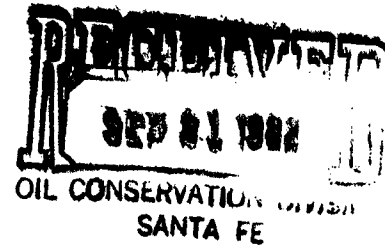
OAS/dp

Enc.

P & S BRINE SALES  
P.O. Box 1768  
Eunice, New Mexico 88231

September 16, 1982

State of New Mexico  
Energy & Minerals Department  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501



Attention: Mr. Oscar Simpson

Dear Sir:

In order to comply with a request from Mr. Joe D. Ramey for a Discharge Plan on our brine well located in Section 34, Township 21 South, Range 37 East, Lea County, New Mexico we list the following information:

This brine well operates by pumping fresh water down the casing and back out the tubing. This way no salt is ever in the casing and therefore cannot get back into the fresh water formations.

This well was drilled by Baber Drilling Company with a rotary rig.

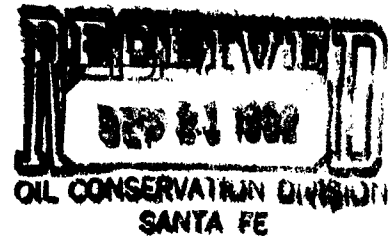
P & S Brine Sales purchases its fresh water from the City of Eunice and stores same in a 1,000 barrel tank on location.

When fresh water is pumped down the casing into the salt section, it washes out the brine water and pumps it to the surface. Once on the surface this brine water is stored in three (3) 1,000 barrel tanks.

In order to keep any brine water from going back into the ground, we have a small working pit and have our own vacuum truck to pick up this water and put it back into the storage tanks.

On the enclosed pages please find the following information:

Page 2  
Oil Conservation Division  
State of New Mexico



1. Well location and acreage dedicated plat.
2. Cost and company for drilling well.
3. Plugging bond.
4. Drilling record (log).
5. Halliburton cementing proposal.
6. Diagram (surface, casing, tubing).
7. Diagram (wellhead).
8. Tretolite (water analysis report).
9. Pictures of P & S Brine facilities.
10. Well completion report and logs.

Our brine water is sold to various companies including Petro Thermo Corporation, Hobbs, New Mexico, McCasland Services, Inc., Eunice, New Mexico, Chaparral Service, Inc., Eunice, New Mexico, Sonny's Oil Field Services, Hobbs, New Mexico.

The volume of brine water sold from this location will vary from 10,000 barrels per month to 18,000 barrels depending upon the demand for same in this area.

Should you need additional information or have any questions, please call me at 505-394-2545.

Yours very truly,

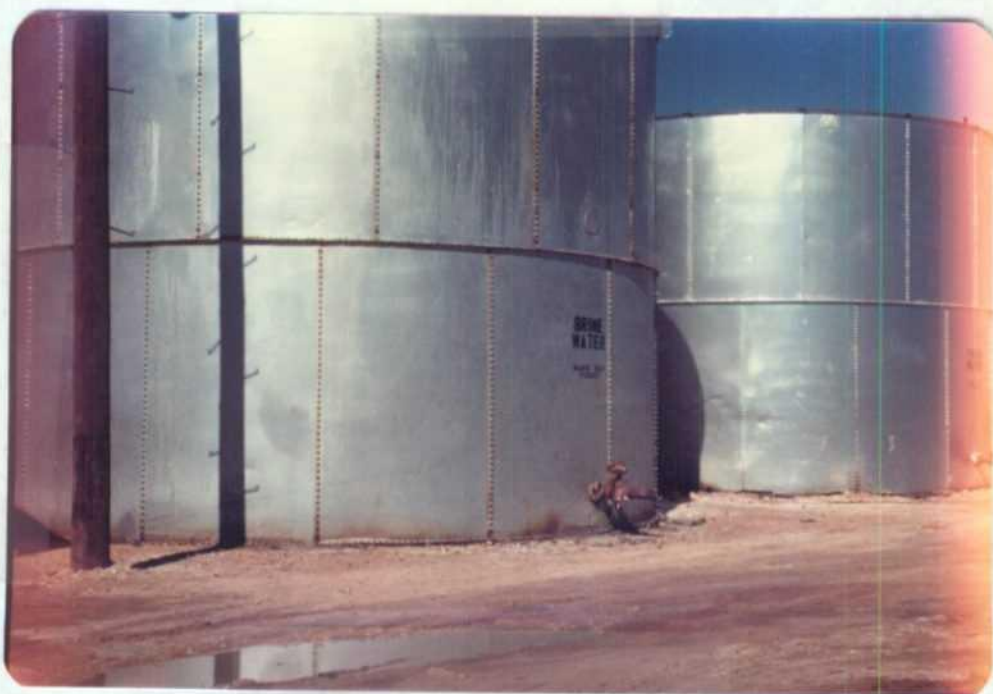
P & S BRINE SALES

A handwritten signature in cursive script, appearing to read "Paul D. Prather".

Paul D. Prather  
Partner

PDP:js

# P&S. BRINE SALES



NEW MEXICO OIL CONSERVATION COMMISSION  
WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102  
Supersedes C-128  
Effective 1-1-65

All distances must be from the outer boundaries of the Section.

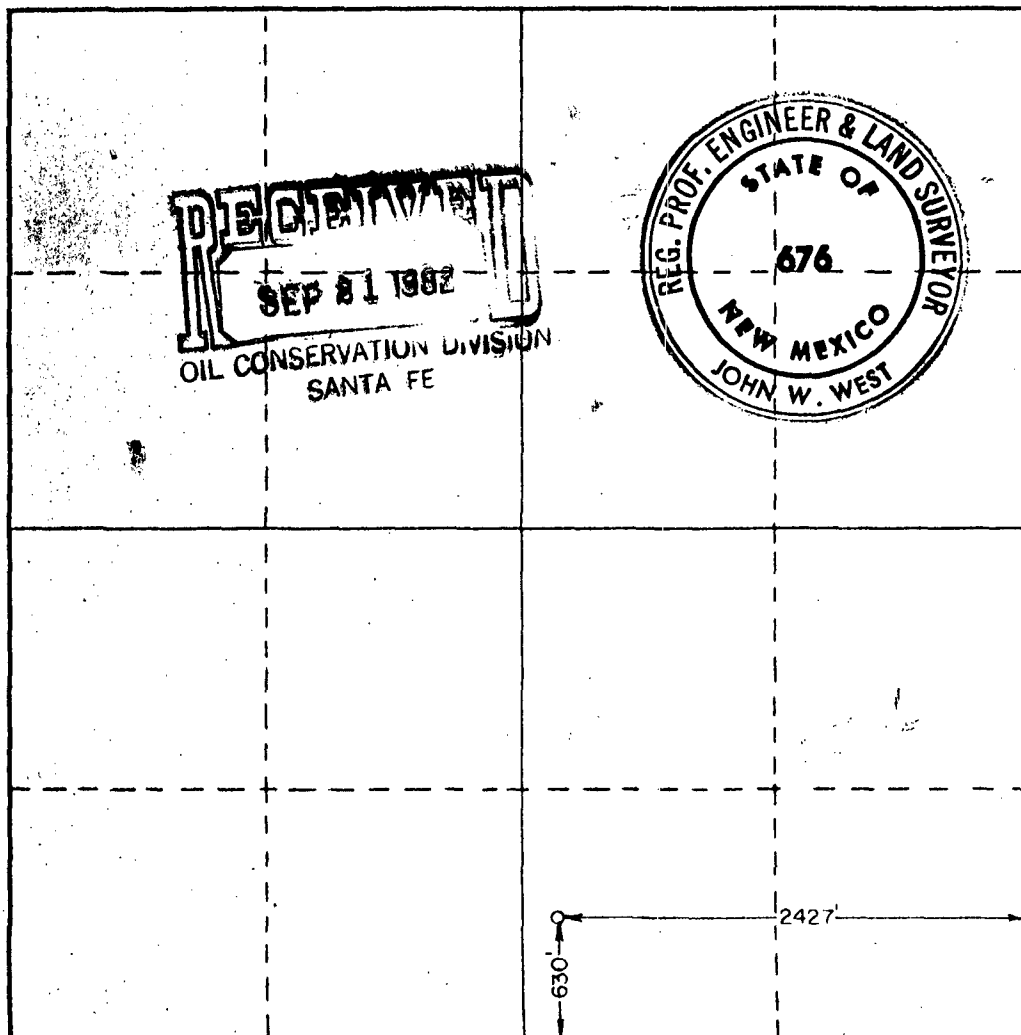
Operator <b>P &amp; S Brine Sales</b>			Lease <b>Eunice Well</b>		Well No. <b>1</b>
Unit Letter <b>O</b>	Section <b>34</b>	Township <b>21 South</b>	Range <b>37 East</b>	County <b>Lea</b>	
Actual Footage Location of Well:					
<b>630</b> feet from the <b>South</b> line and		<b>2427</b> feet from the <b>East</b> line			
Ground Level Elev. <b>3426.5</b>	Producing Formation		Pool	Dedicated Acreage:  Acres	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

☐ Yes ☐ No If answer is "yes," type of consolidation \_\_\_\_\_

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) \_\_\_\_\_

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



CERTIFICATION

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

Name \_\_\_\_\_

Position \_\_\_\_\_

Company \_\_\_\_\_

Date \_\_\_\_\_

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed

**June 12, 1980**

Registered Professional Engineer and/or Land Surveyor

*John W. West*

Certificate No. **JOHN W. WEST 676**  
**PATRICK A. ROMERO 6863**  
**Ronald J. Eidson 3239**

## BABER WELL SERVICING CO.

HOBBS, NEW MEXICO 88240

P & S BRINE SALES  
P. O. BOX 1075  
EUNICE, NEW MEXICO 88231

INVOICE NO.

CONTRACT NO.

ORDER NO.

DATE 7/10/80

Terms: Net 30 Days. 6% On Past Due Accounts. Payable at Hobbs, New Mexico

Date	Description of Work	Hours	Rate	Amount
	<u>P &amp; S Brine</u> <u>Well No. 1</u>			
	Move in rig and equipment. Rig up and drill 8 3/4 hole to approximately 1500 ft. Run 7" casing, cement. Drill 6 1/4" hole to approximately 1900'. Pull out of hole and run 2 1/2" tubing. Rig down and move rig off location.			
	Bid price			\$ 30,000.00
	1/2 Price on 8 3/4" bit			600.00
	1/2 Price on 6 1/4" bit			130.00
				<u>30,730.00</u>
	4% New Mexico Sales Tax			1,229.20
				<u>\$ 31,959.20</u>
	<u>JOB COMPLETE</u>			
	<u>THANK YOU</u>			





DANIELS INSURANCE INC.

P.O. BOX 1258 " HOBBS, NEW MEXICO 88240 " (505) 393-5191 " INSURANCE " BONDS " REAL ESTATE " ESTABLISHED 1937

June 13, 1980

PAT CARGILE  
Senior Vice President

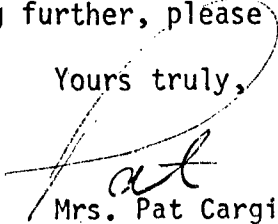
Oil Conservation Commission  
P. O. Box ~~1028~~ 2088  
Santa Fe, New Mexico 87501

RE: P & S Brine Sales  
Salt Water Disposal Well  
Sec. 34, Twsp. ~~31S~~, Rge. ~~30E~~ 31  
Lea County, New Mexico

Gentlemen:

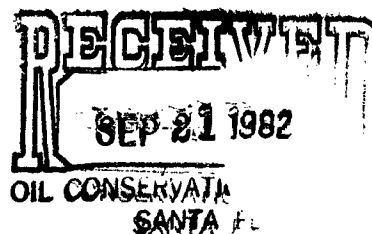
We enclose Hartford Accident & Indemnity Company Bond #4420776  
in the amount of \$5,000.00 covering the captioned well. If you  
require anything further, please advise.

Yours truly,

  
Mrs. Pat Cargile

pc

CC: Mr. Paul D. Prather  
P & S Brine Sales  
P. O. Box 1075  
Eunice, New Mexico 88321





STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

LARRY KEHOE  
SECRETARY

June 27, 1980

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

Daniels Insurance  
P. O. Box 1258  
Hobbs, New Mexico 88240

Re: \$5,000 One-Well Plugging Bond  
P & S Brine Sale, Principal  
Hartford Accident & Indemnity  
Company, Surety  
630 feet from South line and  
2427 feet from East line, Sec. 34,  
T-31-S, R-38-E, Lea County  
Depth: 2,000 ft.  
Bond No. 4420776

Gentlemen:

The Oil Conservation Division hereby approves the  
above-captioned plugging bond effective June 13, 1980.  
We also acknowledge receipt of and approve the rider  
changing the location of the well as follows:

630' FSL and 2427' FEL of Sec. 34, T-21-S,  
R-37-E, Lea County.

Sincerely,

JOE D. RAMEY,  
Director

JDR/dr

cc: Oil Conservation Division  
Hobbs, New Mexico

P & S Brine Sales  
P. O. Box 1075  
Eunice, New Mexico 88231



SERVICES

FRACTURING  
CEMENTING  
CHEMICAL  
SERVICE

## PROPOSAL

June 17, 1980

### PROCEDURE ANALYSIS Cementing

For: Mr. Dink Prather  
CHAPARRAL SERVICE, INC.  
Eunice, New Mexico 88231

Re: Brine water well

The purpose of this analysis is to recommend a cement blend and cost estimate for cementing the above captioned well.

### WELL DATA: Surface

Depth - 2000 feet  
Hole - 8 1/2"  
Casing - 7"  
Excess - 100%  
Cement to circulate

### RECOMMENDATION:

It is recommended to set the 7" surface casing with 400 sacks of Halliburton Light containing 15 lb. salt and 1/4 lb. Flocele followed by 300 sacks of Class "C" with 2% CaCl<sub>2</sub>. Cement to circulate back to surface.

Floating equipment should include a 7" Guide Shoe, insert float, and 1 lb. Weld-A.

### PROCEDURE:

1. Run casing to TD with floating equipment consisting of a 7" Guide Shoe, a 7" Insert Float, and 1 lb. of Weld-A.
2. Cement with 400 sacks of Halliburton Light with 15 lb. salt and 1/4 lb. Flocele per sack, followed by 300 sacks of Class "C" with 2% CaCl<sub>2</sub>.

Page 2  
Mr. Dink Prather  
CHAPARRAL SERVICE, INC.  
June 17, 1980

COST ESTIMATE:

Pump service	\$ 757.00
Mileage	75.00
Plug	38.00
400 sks. HLC W/additives + 300 sks. "C" W/2% CaCl <sub>2</sub>	4,850.25
Guide shoe	102.00
Insert Float	92.00
Weld-A	8.15
	<hr/>
TOTAL	\$ 5,922.40

The unit prices in this proposal are estimates only, based on current published prices. At the time materials are delivered and/or services performed, the unit prices may be changed by field operations depending upon the then current published prices, availability of equipment and materials, time factors or changes in well conditions.

We are pleased to have this opportunity to present this proposal for your consideration. If you accept our proposal, all materials and equipment furnished and services performed will be under our General Terms and Conditions and pursuant to our applicable Work Order Contract (whether or not executed by you). Copies of our General Terms and Conditions and applicable Work Order Contract will be furnished on request.

Prepared by H. D. Foster  
Harold Foster  
Assistant District Superintendent  
Hobbs, New Mexico

HF/bh

cc: Earl Stanley  
Leo Brown  
Norman Criswell  
Marvin Manley  
Phil Browning  
Byron Sprawls  
Buddy Redden  
Hobbs Sales



REMIT TO  
P. O. BOX 84737  
DALLAS, TEXAS 75284

DIRECT ANY CORRESPONDENCE TO  
P. O. DRAWER 1431

DUNCAN, OKLAHOMA 73553

PAGE

PAGES

NO.

INVOICE

820804

WELL NO. AND FARM

COUNTY

STATE

DATE

#1 Brine Water well LEFT 19. Mex 7-3 80

CHARGE TO P & S Brine Sales OWNER P & S Brine DUNCAN USE ONLY

ADDRESS P.O. Box 1075 CONTRACTOR Baber Well Serv. LOCATION Hobbs CODE 20340

CITY, STATE, ZIP Eunice N. Mex 88231 SHIPPED VIA Co. Wch LOCATION 2 CODE

DELIVERED TO location LOCATION 3 CODE

ORDER NO. BULK MATERIAL DELIVERY TICKET NO. B-851142

TOTAL ACID: 30 DAYS WELL TYPE Water well CODE ww

TYPE AND PURPOSE OF JOB 7" intermediate

TERMS: NET DUE BY THE 20TH OF FOLLOWING MONTH. INTEREST CHARGED AFTER 60 DAYS FROM DATE OF INVOICE.

PRICE REFERENCE	SECONDARY REF. OR PART NO.	CODE		DESCRIPTION	UNITS 1		UNITS 2		UNIT PRICE	AMOUNT	
		L	D		QTY.	MEAS.	QTY.	MEAS.			
000-117		1	C	MILEAGE	25	mi			165	41	25
001-016		1	C	Pump chg	133	"				737	78
030-015		1	C	5 wp Top plug 7"	1	EA				40	00
24A	815.19401	1	S	Insert Float	1	EA				101	00
12A	825.212	1	S	Guide shoe	1	EA				112	00
350	890.10802	1	S	Weld A	1	#				8	95
504-050		1	B	Class C Cmt	350	bx			485	1697	50
509-406		1	B	CaCl <sub>2</sub> m 2%	7	bx			1900	126	00
				SERVICE CHARGE ON MATERIALS RETURNED		CU. FT.					
500-207		1	B	SERVICE CHARGE	364	CU. FT.			176	276	64
500-306		1	B	33426 TOTAL WEIGHT 25 LOADED MILES	418.8	TON MILES			158	212	33

TAX REFERENCES

800029  
800045

SUB TOTAL

TAX

TAX

TAX

TOTAL

3383 45

126 88

130

3511 63

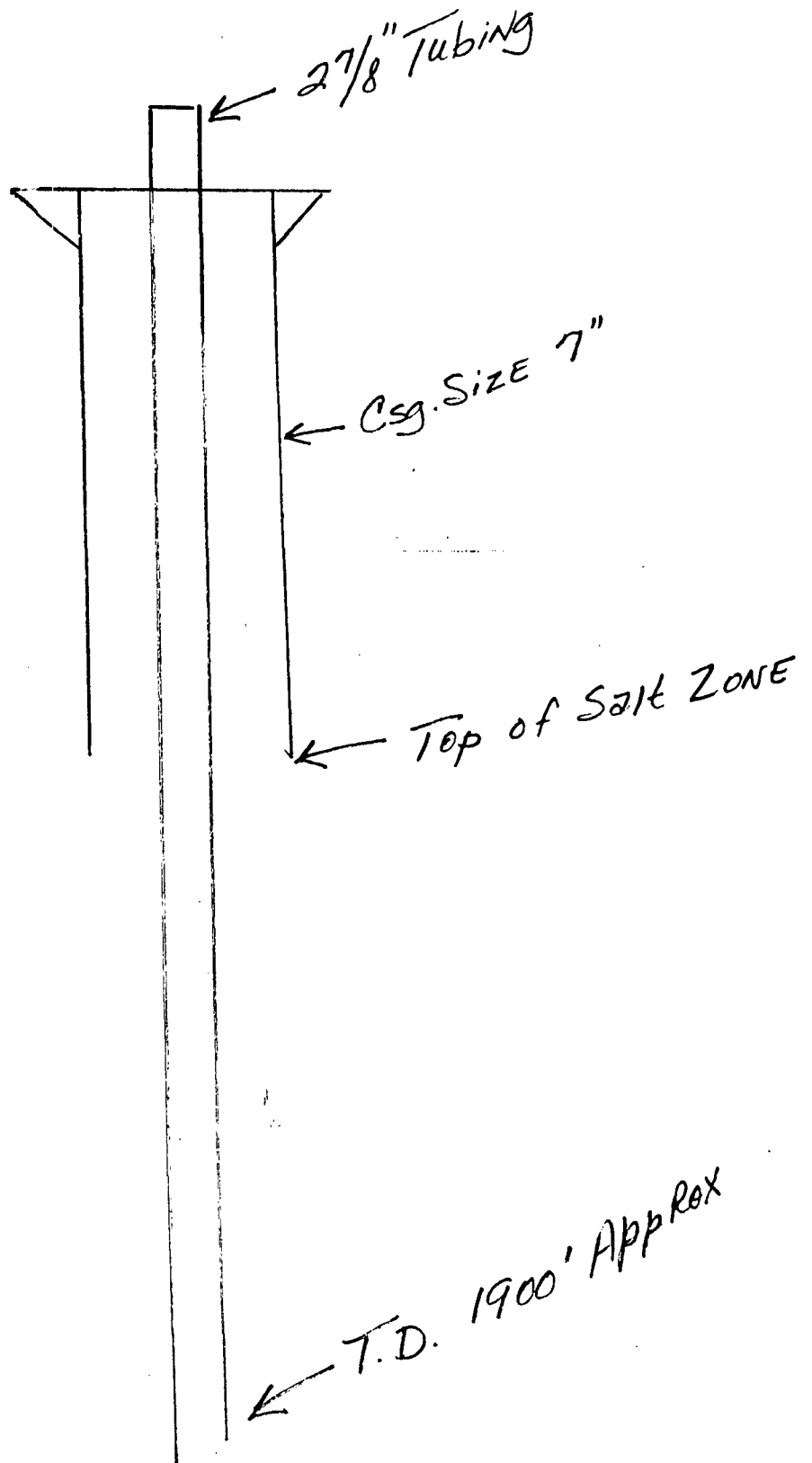
WAS JOB SATISFACTORILY COMPLETED?  
WAS OPERATION OF EQUIPMENT SATISFACTORY?  
WAS PERFORMANCE OF PERSONNEL SATISFACTORY?

Customer of His Agent

J.M. FUGA  
Halliburton Operator

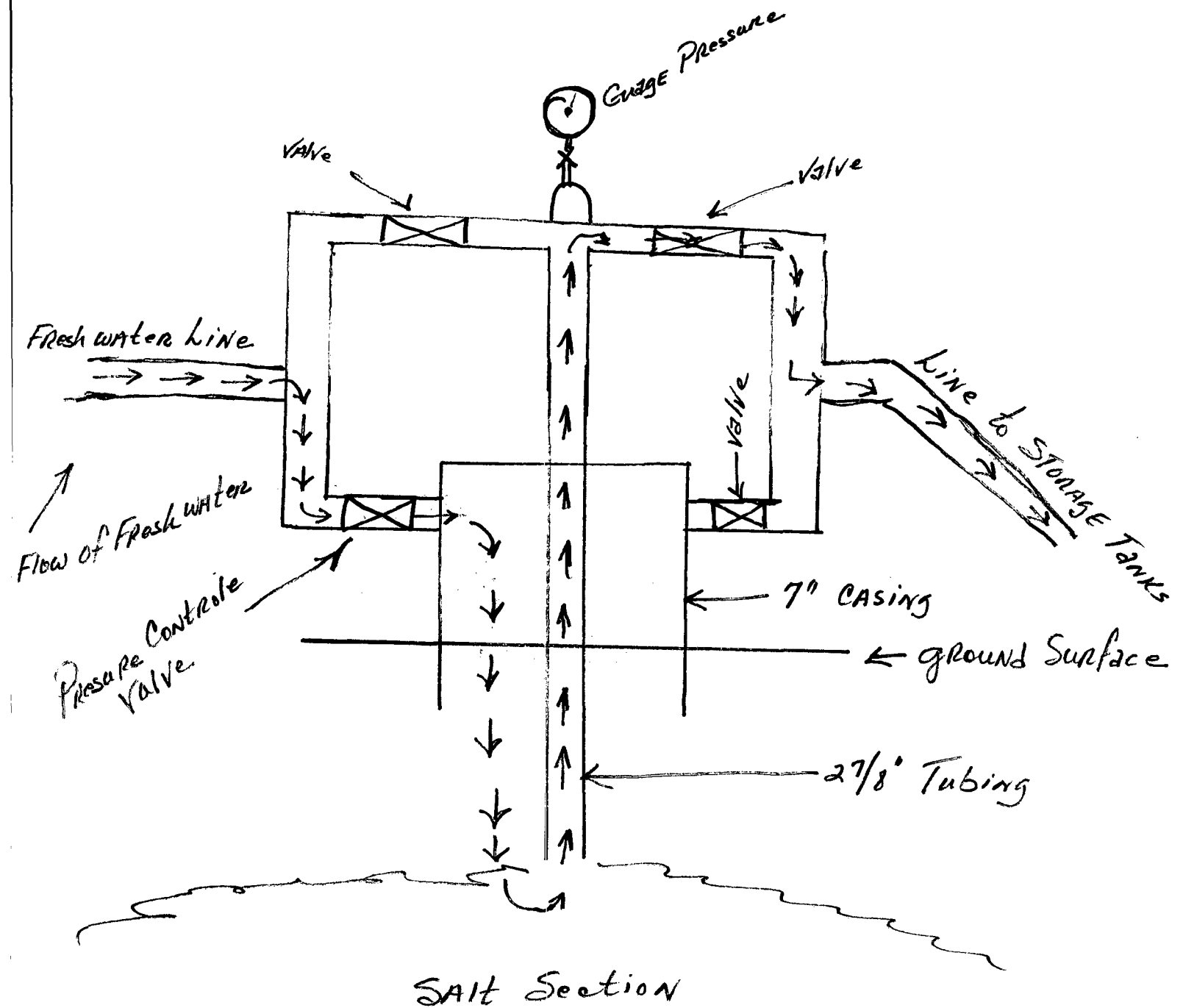
P+S. Brine Sale

Well #1



# PLS BRINE SALES

Well #1





# TRETOLITE DIVISION

369 Marshall Avenue / Saint Louis, Missouri 63119  
(314) WO 1-3500/TWX 910-760-1660/Telex 44-2417

## WATER ANALYSIS REPORT

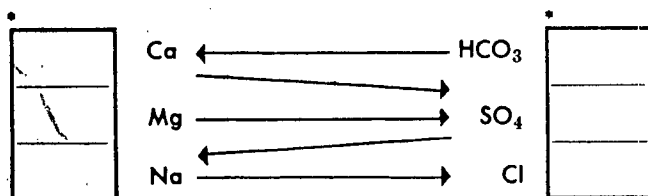
COMPANY P&S Brine Sale ADDRESS \_\_\_\_\_ DATE: 7/15/82  
SOURCE Calcium ("CA") DATE SAMPLED \_\_\_\_\_ ANALYSIS NO. \_\_\_\_\_  
Analysis Mg/L \*Meq/L

1. pH \_\_\_\_\_
2. H<sub>2</sub>S (Qualitative) \_\_\_\_\_
3. Specific Gravity \_\_\_\_\_
4. Dissolved Solids \_\_\_\_\_
5. Suspended Solids \_\_\_\_\_
6. Phenolphthalein Alkalinity (CaCO<sub>3</sub>) \_\_\_\_\_
7. Methyl Orange Alkalinity (CaCO<sub>3</sub>) \_\_\_\_\_
8. Bicarbonate (HCO<sub>3</sub>) \_\_\_\_\_
9. Chlorides (Cl) \_\_\_\_\_
10. Sulfates (SO<sub>4</sub>) \_\_\_\_\_
11. Calcium (Ca) \_\_\_\_\_
12. Magnesium (Mg) \_\_\_\_\_
13. Total Hardness (CaCO<sub>3</sub>) \_\_\_\_\_
14. Total Iron (Fe) \_\_\_\_\_
15. Barium (Qualitative) \_\_\_\_\_
16. Strontium \_\_\_\_\_

HCO<sub>3</sub> \_\_\_\_\_ ÷ 61 \_\_\_\_\_ HCO<sub>3</sub>  
Cl \_\_\_\_\_ ÷ 35.5 \_\_\_\_\_ Cl  
SO<sub>4</sub> \_\_\_\_\_ ÷ 48 \_\_\_\_\_ SO<sub>4</sub>  
Ca 3200 ÷ 20 \_\_\_\_\_ Ca  
Mg 2065 ÷ 12.2 \_\_\_\_\_ Mg  
16500

\*Milli equivalents per liter

### PROBABLE MINERAL COMPOSITION



Saturation Values Distilled Water 20°C  
Ca CO<sub>3</sub> 13 Mg/L  
Ca SO<sub>4</sub> • 2H<sub>2</sub>O 2,090 Mg/L  
Mg CO<sub>3</sub> 103 Mg/L

Compound	Equiv. Wt.	X	Meq/L	=	Mg/L
Ca (HCO <sub>3</sub> ) <sub>2</sub>	81.04	_____	_____	_____	_____
Ca SO <sub>4</sub>	68.07	_____	_____	_____	_____
Ca Cl <sub>2</sub>	55.50	_____	_____	_____	_____
Mg (HCO <sub>3</sub> ) <sub>2</sub>	73.17	_____	_____	_____	_____
Mg SO <sub>4</sub>	60.19	_____	_____	_____	_____
Mg Cl <sub>2</sub>	47.62	_____	_____	_____	_____
Na HCO <sub>3</sub>	84.00	_____	_____	_____	_____
Na <sub>2</sub> SO <sub>4</sub>	71.03	_____	_____	_____	_____
Na Cl	58.46	_____	_____	_____	_____

REMARKS \_\_\_\_\_

Respectfully submitted  
TRETOLITE COMPANY





# TRETOLITE DIVISION

369 Marshall Avenue / Saint Louis, Missouri 63119  
(314) WO 1-3500/TWX 910-760-1660/Telex 44-2417

## WATER ANALYSIS REPORT

397  
3044

COMPANY P+BRINE SALE ADDRESS \_\_\_\_\_ DATE: 7/15/82

SOURCE Magnesium "MG" ANALYSIS NO. \_\_\_\_\_

Analysis

Mg/L

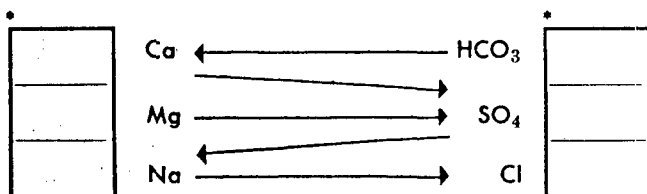
\*Meq/L

1. pH \_\_\_\_\_
2. H<sub>2</sub>S (Qualitative) \_\_\_\_\_
3. Specific Gravity \_\_\_\_\_
4. Dissolved Solids \_\_\_\_\_
5. Suspended Solids \_\_\_\_\_
6. Phenolphthalein Alkalinity (CaCO<sub>3</sub>) \_\_\_\_\_
7. Methyl Orange Alkalinity (CaCO<sub>3</sub>) \_\_\_\_\_
8. Bicarbonate (HCO<sub>3</sub>) \_\_\_\_\_
9. Chlorides (Cl) \_\_\_\_\_
10. Sulfates (SO<sub>4</sub>) \_\_\_\_\_
11. Calcium (Ca) \_\_\_\_\_
12. Magnesium (Mg) \_\_\_\_\_
13. Total Hardness (CaCO<sub>3</sub>) \_\_\_\_\_
14. Total Iron (Fe) \_\_\_\_\_
15. Barium (Qualitative) \_\_\_\_\_
16. Strontium \_\_\_\_\_

HCO<sub>3</sub> \_\_\_\_\_ ÷ 61 \_\_\_\_\_ HCO<sub>3</sub>  
Cl \_\_\_\_\_ ÷ 35.5 \_\_\_\_\_ Cl  
SO<sub>4</sub> \_\_\_\_\_ ÷ 48 \_\_\_\_\_ SO<sub>4</sub>  
Ca 3200 ÷ 20 \_\_\_\_\_ Ca  
Mg 121 ÷ 12.2 \_\_\_\_\_ Mg  
8500

\*Milli equivalents per liter

### PROBABLE MINERAL COMPOSITION



Saturation Values	Distilled Water 20°C
Ca CO <sub>3</sub>	13 Mg/L
Ca SO <sub>4</sub> • 2H <sub>2</sub> O	2,090 Mg/L
Mg CO <sub>3</sub>	103 Mg/L

Compound	Equiv. Wt.	X	Meq/L	=	Mg/L
Ca (HCO <sub>3</sub> ) <sub>2</sub>	81.04				
Ca SO <sub>4</sub>	68.07				
Ca Cl <sub>2</sub>	55.50				
Mg (HCO <sub>3</sub> ) <sub>2</sub>	73.17				
Mg SO <sub>4</sub>	60.19				
Mg Cl <sub>2</sub>	47.62				
Na HCO <sub>3</sub>	84.00				
Na <sub>2</sub> SO <sub>4</sub>	71.03				
Na Cl	58.46				

REMARKS \_\_\_\_\_

Respectfully submitted  
TRETOLITE COMPANY

OIL CONSERVATION DIVISION

P. O. BOX 2088  
SANTA FE, NEW MEXICO 87501

WELL COMPLETION OR RECOMPLETION REPORT AND LOG

NO. OF COPIES RECEIVED	
DISTRIBUTION	
SANTA FE	
FILE	
U.S.O.S.	
LAND OFFICE	
OPERATOR	

5a. Indicate Type of Lease	
State <input type="checkbox"/>	Fee <input checked="" type="checkbox"/>
5. State Oil & Gas Lease No.	

1a. TYPE OF WELL	
OIL WELL <input type="checkbox"/>	GAS WELL <input type="checkbox"/> DRY <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> <b>BRINE WELL</b>
b. TYPE OF COMPLETION	
NEW WELL <input type="checkbox"/>	WORK OVER <input type="checkbox"/> DEEPEN <input type="checkbox"/> PLUG BACK <input type="checkbox"/> DIFF. RESVR. <input type="checkbox"/> OTHER <input type="checkbox"/>

2. Unit Agreement Name
<b>P+S BRINE Sales</b>
8. Farm or Lease Name
<b>EUNICE</b>

3. Name of Operator
<b>P+S BRINE Sales</b>
3. Address of Operator
<b>Box 1075 EUNICE, N.M. 88231</b>
4. Location of Well

9. Well No.
<b>#1</b>
10. Field and Pool, or Wildcat

UNIT LETTER <b>0</b>	LOCATED <b>630'</b>	FEET FROM THE <b>South</b>	LINE AND <b>2427'</b>	FEET FROM
THE <b>EAST</b> LINE OF SEC. <b>34</b> TWP. <b>21</b> RGE. <b>37</b> NMPM				

12. County
------------

15. Date Spudded	16. Date T.D. Reached	17. Date Compl. (Ready to Prod.)	18. Elevations (DF, RKB, RT, GR, etc.)	19. Elev. Casinghead
<b>7/1/80</b>	<b>7/7/80</b>	<b>7/17/80</b>	<b>3426.5</b>	<b>2'6"</b>
20. Total Depth	21. Plug Back T.D.	22. If Multiple Compl., How Many	23. Intervals Drilled By	Rotary Tools
<b>1816'</b>				<b>X</b>

25. Was Directional Survey Made
<b>Yes</b>
27. Was Well Cored
<b>NO</b>

24. Producing Interval(s), of this completion - Top, Bottom, Name
<b>SALT section</b>
26. Type Electric and Other Logs Run
<b>NONE</b>

28. CASING RECORD (Report all strings set in well)					
CASING SIZE	WEIGHT LB./FT.	DEPTH SET	HOLE SIZE	CEMENTING RECORD	AMOUNT PULLED
<b>7"</b>	<b>23#</b>	<b>1200'</b>	<b>8 3/4"</b>	<b>Halliburton</b>	

29. LINER RECORD				30. TUBING RECORD			
SIZE	TOP	BOTTOM	SACKS CEMENT	SCREEN	SIZE	DEPTH SET	PACKER SET

31. Perforation Record (Interval, size and number)	32. ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC.
<b>RECEIVED</b> <b>SEP 21 1982</b>	DEPTH INTERVAL
	AMOUNT AND KIND MATERIAL USED

33. OIL CONSERVATION DIVISION PRODUCTION							
Date First Production	Production Method <b>SANTA FE</b> <b>pumping BRINE WATER</b>					Well Status (Prod. or Shut-in)	
<b>7/21/80</b>						<b>Prod</b>	
Date of Test	Hours Tested	Choke Size	Prod'n. For Test Period	Oil - Bbl.	Gas - MCF	Water - Bbl.	Gas - Oil Ratio
Flow Tubing Press.	Casing Pressure	Calculated 24-Hour Rate	Oil - Bbl.	Gas - MCF	Water - Bbl.	Oil Gravity - API (Corr.)	

34. Disposition of Gas (Sold, used for fuel, vented, etc.)	Test Witnessed By
--	-------------------

35. List of Attachments
-------------------------

36. I hereby certify that the information shown on both sides of this form is true and complete to the best of my knowledge and belief.		
SIGNED <b>Lane Prather</b>	TITLE <b>Partner</b>	DATE <b>12/2/80</b>

## INVENTORY OF SOLUTION MINING WELLS

OIL CONSERVATION DIVISION, 1981

\* = please attach pertinent documents

## I. OPERATOR / LOCATION INFORMATION

EVNICE #1

Operator P + S BRINE SALESAddress BOX 1075EVNICE NM 88231 Phone \_\_\_\_\_Well unit # 0 Location 670/S 2427/ET. 21 R. 37 Sec. 34 SE 1/4 SW 1/4 SW 1/4County LEA

Purpose of well (brine supply, LPG storage, potash dissolution) \_\_\_\_\_

BRINE SUPPLY

## II. DRILLING / SITING INFORMATION

Contractor Baker Well ServiceDate drilling started 7-1-80 Date drilling completed 7-17-80Drilling method Rotary RigElevation of ground surface 3426.5 How measured \_\_\_\_\_Date measured 6-12-1980 Order of survey \_\_\_\_\_Name of surveyor John W. WestTotal depth of hole 1816'

Attach schematic of well, include open hole interval, perforations, etc. \*

Type of drilling fluid Fresh waterType of drilling mud if used (brand if known) NO MUD

List any additives to the drilling mud, or any other chemicals put down well:

NONEDescribe casing tests performed 7" 23"

Other tests \_\_\_\_\_

P. 1000-1000

\* = please attach pertinent documents

## II. DRILLING / SITING (continued)

Casing, tubing, and cementing record (please attach copy)\*

Note: if a copy is not available detail casing record on back of this sheet using the following format. Include brand or type of cement if known.

From	To	Size of Hole	Size of Casing	Weight per Foot	Sacks of Cement	Estimated Top of cmt.
------	----	-----------------	-------------------	--------------------	--------------------	--------------------------

Was mudcake on bore wall removed before cementing production casing? yes

Was salt saturated cementing material used opposite salt formation? yes

Is site within 1/2 mile of another well? If so, use note to explain. yes

Rowland Torking Co has Brine Well due North  
approx 1/2 mile -

Site preparation (concrete pad, graded dirt, pit, etc) \_\_\_\_\_

Pad Built with concrete - a concrete pit

Type of surface seal or well-head (locking security cap, welded, etc.) \_\_\_\_\_

7 in well head with screw cap -

Comments (include problems encountered while drilling, loss of circulation, deviation of hole from vertical, centralizers used, tools lost or stuck, fracturing techniques used, etc.) NONE

\_\_\_\_\_  
(use back of sheet if more space is required)

From	To	Size of Hole	Size of Casing	Weight per Foot	Sacks of Cement	Estimated Top of cmt.
------	----	-----------------	-------------------	--------------------	--------------------	--------------------------

<i>Tubing</i>	0 - 1200	8 <sup>3</sup> / <sub>4</sub>	7	23	?	<i>Surface</i>
	- 1700	6 <sup>1</sup> / <sub>4</sub>				

\* = please attach pertinent documents

## III. FORMATION INFORMATION

Formation Record			
From	To	Thickness	Formation (name, description)
0'	1816'		Red Bed, Arkhite, part

Logs (specify type) NONE

Identify where logs are on file \_\_\_\_\_

\* = please attach pertinent documents

## IV. AQUIFER INFORMATION

## Aquifers encountered during drilling

From	To	Aquifer Description	Amount of Water entering hole	Quality of Water
------	----	------------------------	-------------------------------------	---------------------

Note: if water quality analyses are available please attach.\*

Source of aquifer description \_\_\_\_\_

Depth at which water was first encountered \_\_\_\_\_

Depth to which water rose \_\_\_\_\_

Source of water level data \_\_\_\_\_

Comments (include information regarding determination of piezometric level  
and method of sealing off water zone) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* = please attach pertinent documents

V. PRODUCTION / BRINE STORAGE INFORMATION

Method of production (describe fully) Pumping fresh water down  
7" casing Bore hole in 8" casing

Was well used previously for some purpose other than brine supply, potash dissolution, or LPG storage. If so use note to explain. NO

Use of brine for ORG Rigs-

Source of injection water (be specific) Buying water from City  
of Kansas

Attach detailed production history (include dates of production, amount of water injected, injection rates, amount of brine produced, production rates, method of gaging injection/production rates )\*

Note: If the cavity was used for LPG storage include volumes of product injected and withdrawn as well as a summary of the maximum and minimum pressures during injection, storage and withdrawal.

Chemical analyses of injection water (attach)\*

Note : Chemical analyses should include sampling point and method, pH, temperature, method of analysis, name and location of laboratory, etc.

Chemical analyses of water produced (attach)\*

Dates of Production - almost every day  
Water injected - varies -  
injection Rate - 1 Bbls min @ 200#  
Amount Brine Produced - varies -  
Production Rate - 1 Bbls per hour  
Water purchased - Brine used



\* = please attach pertinent documents

V. PRODUCTION / BRINE STORAGE (continued)

Brine storage facilities (describe) 3 - 1000 BBL Tanks -

Current condition/status of brine storage pit NONE

Is brine storage pit currently being monitored for leakage? NO

Specify company or agency which is monitoring leakage \_\_\_\_\_

If pit leakage has been monitored in past use note to explain. \_\_\_\_\_

Comments on production history (note if production rates or brine concentrations have changed through time) NO

533,454 BBLs produced thru 4/82

Assume sent 8180 = 21 months

\*. = please attach pertinent documents

## VI. ABANDONMENT / PLUGGING RECORD

Date well abandoned/plugged

*well still producing -*

Reason for well abandonment or plugging

Method of Plugging (describe fully, include amounts of cement, est. top, plug type, depth, etc.)

## VII. Further comments (subsidence noted, subsidence monitoring, leakage noted, natural subsidence features noted nearby, LPG storage data, etc.)

Recorded by

*P+S BRINE SALES*

Date



STATE OF NEW MEXICO  
ENERGY AND MINERALS DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

June 27, 1980

LARRY KEHOE  
SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87501  
(505) 827-2434

Daniels Insurance  
P. O. Box 1258  
Hobbs, New Mexico 88240

Re: \$5,000 One-Well Plugging Bond  
P & S Brine Sale, Principal  
Hartford Accident & Indemnity  
Company, Surety  
630 feet from South line and  
2427 feet from East line, Sec. 34,  
T-31-S, R-38-E, Lea County  
Depth: 2,000 ft.  
Bond No. 4420776

Gentlemen:

The Oil Conservation Division hereby approves the  
above-captioned plugging bond effective June 13, 1980.  
We also acknowledge receipt of and approve the rider  
changing the location of the well as follows:

630' FSL and 2427' FEL of Sec. 34, T-21-S,  
R-37-E, Lea County.

Sincerely,

JOE D. RAMEY,  
Director

JDR/dr

cc: Oil Conservation Division  
Hobbs, New Mexico

P & S Brine Sales  
P. O. Box 1075  
Eunice, New Mexico 88231



**HALLIBURTON SERVICES**

**FRACTURING  
CEMENTING  
CHEMICAL  
SERVICE**

## PROPOSAL

June 17, 1980

### PROCEDURE ANALYSIS Cementing

For: Mr. Dink Prather  
CHAPARRAL SERVICE, INC.  
Eunice, New Mexico 88231

Re: Brine water well

The purpose of this analysis is to recommend a cement blend and cost estimate for cementing the above captioned well.

### WELL DATA: Surface

Depth - 2000 feet  
Hole - 8 1/2"  
Casing - 7"  
Excess - 100%  
Cement to circulate

### RECOMMENDATION:

It is recommended to set the 7" surface casing with 400 sacks of Halliburton Light containing 15 lb. salt and 1/4 lb. Flocele followed by 300 sacks of Class "C" with 2% CaCl<sub>2</sub>. Cement to circulate back to surface.

Floating equipment should include a 7" Guide Shoe, insert float, and 1 lb. Weld-A.

### PROCEDURE:

1. Run casing to TD with floating equipment consisting of a 7" Guide Shoe, a 7" Insert Float, and 1 lb. of Weld-A.
2. Cement with 400 sacks of Halliburton Light with 15 lb. salt and 1/4 lb. Flocele per sack, followed by 300 sacks of Class "C" with 2% CaCl<sub>2</sub>.

*8 9 1/4" Bore to 9" Bore  
cellar 7 5/8" = 1*

Page 2  
Mr. Dink Prather  
CHAPARRAL SERVICE, INC.  
June 17, 1980


COST ESTIMATE:

Pump service	\$ 757.00
Mileage	75.00
Plug	38.00
400 sks. HLC W/additives + 300 sks. "C" W/2% CaCl <sub>2</sub>	4,850.25
Guide shoe	102.00
Insert Float	92.00
Weld-A	8.15
TOTAL	\$ 5,922.40

The unit prices in this proposal are estimates only, based on current published prices. At the time materials are delivered and/or services performed, the unit prices may be changed by field operations depending upon the then current published prices, availability of equipment and materials, time factors or changes in well conditions.

We are pleased to have this opportunity to present this proposal for your consideration. If you accept our proposal, all materials and equipment furnished and services performed will be under our General Terms and Conditions and pursuant to our applicable Work Order Contract (whether or not executed by you). Copies of our General Terms and Conditions and applicable Work Order Contract will be furnished on request.

Prepared by

  
Harold Foster  
Assistant District Superintendent  
Hobbs, New Mexico

HF/bh

cc: Earl Stanley  
Leo Brown  
Norman Criswell  
Marvin Manley  
Phil Browning  
Byron Sprawls  
Buddy Redden  
Hobbs Sales



**THE REPRODUCTION OF  
THE  
FOLLOWING  
DOCUMENT ( S )  
CANNOT BE IMPROVED  
DUE TO  
THE CONDITION OF  
THE ORIGINAL**



A DIVISION OF HALLIBURTON COMPANY

REMIT TO  
P. O. BOX 84737  
DALLAS, TEXAS 75284DIRECT ANY CORRESPONDENCE TO  
P. O. DRAWER 1431  
DUNCAN, OKLAHOMA 73533

PAGE

PAGES

NO.

FIELD TICKET  
820804

WELL NO. AND FARM #1 Beane Water well	COUNTY LEA	STATE N.Mex	DATE 7-3-80
CHARGE TO P. Sabine Sales Inc.	OWNER Chaparral	DUNCAN USE ONLY	
ADDRESS P.O. Box 1075	CONTRACTOR Baker Well Serv.	LOCATION 1 Hobbs	CODE 20740
CITY, STATE, ZIP Eunice N. Mex	SHIPPED VIA Co. Veh	LOCATION 2	CODE
DUNCAN USE ONLY	DELIVERED TO location	LOCATION 3	CODE
	ORDER NO.	BULK MATERIAL DELIVERY TICKET NO. B-	
	TOTAL ACID-30 DAYS	WELL TYPE Water well	
	TYPE AND PURPOSE OF JOB 7" intermediate		
TERMS: NET DUE BY THE 20TH OF FOLLOWING MONTH. INTEREST CHARGED AFTER 60 DAYS FROM DATE OF INVOICE.			

PRICE REFERENCE	SECONDARY REF. OR PART NO.	CODE		DESCRIPTION	UNITS 1		UNITS 2		UNIT PRICE	AMOUNT	
		L	D		QTY.	MEAS.	QTY.	MEAS.			
000-117		1	C	MILEAGE	25	mi			163	41	25
001-016		1	C	Pump Chg	133	"				737	38
030-015		1	C	Swp Top plug 7"	1	EA				40	00
24A	815.FM01	1	S	Insert Float	1	EA				92	00
12A	825.212	1	S	Guide shoe	1	EA				102	00
350	890.10802	1	S	Weld A	1	"				815	
504-050		1	B	Class C Pmt	350	SI			485	1692	50
509-406		1	B	CaCl <sub>2</sub> ml 2%	7	SR			1700	126	00
				SERVICE CHARGE ON MATERIALS RETURNED		CU. FT.					
500-207		1	B	SERVICE CHARGE	264	CU. FT.			76	276	64
500-306		1	B	55424 TOTAL WEIGHT 25 LOADED MILES	418.8	TON MILES			158	212	33

WAS JOB SATISFACTORILY COMPLETED?	TAX REFERENCES	SUB TOTAL
WAS OPERATION OF EQUIPMENT SATISFACTORY?		TAX
WAS PERFORMANCE OF PERSONNEL SATISFACTORY?		TAX
x Paul Prather Customer or His Agent	Im F. F. F. Halliburton Operator	TOTAL

THIS IS NOT AN INVOICE

TAXES, PRICE CHANGES, AND OTHER APPLICABLE DATA WILL BE SHOWN ON OUR INVOICE TO BE SUBMITTED FOR PAYMENT AT A LATER DATE.

CUSTOMER

## WORK ORDER CONTRACT AND PRE-TREATMENT DATA

ATTACH TO  
INVOICE & TICKET NO. 830809

DISTRICT Hobbs DATE 7-3-80

TO: HALLIBURTON SERVICES YOU ARE HEREBY REQUESTED TO FURNISH EQUIPMENT AND SERVICEMEN TO DELIVER AND OPERATE  
THE SAME AS AN INDEPENDENT CONTRACTOR TO: P. S. Bennett Sales (CUSTOMER)  
AND DELIVER AND SELL PRODUCTS, SUPPLIES, AND MATERIALS FOR THE PURPOSE OF SERVICING

WELL NO. 1 LEASE Brine Water Well SEC. 1 TWP. 1 RANGE 1  
FIELD Eunice COUNTY LeFlore STATE OK OWNED BY Ch. Marshall Service

### THE FOLLOWING INFORMATION WAS FURNISHED BY THE CUSTOMER OR HIS AGENT

FORMATION NAME	TYPE	NEW USED	WEIGHT	SIZE	FROM	TO	MAX. ALLOW. P.S.I.
CASING		<u>U</u>		<u>7"</u>	<u>0</u>	<u>1321'</u>	
LINER							
TUBING							
OPEN HOLE							SHOTS/FT.
PERFORATIONS							
PERFORATIONS							
PERFORATIONS							

FORMATION THICKNESS \_\_\_\_\_ FROM \_\_\_\_\_ TO \_\_\_\_\_

PACKER: TYPE \_\_\_\_\_ SET AT \_\_\_\_\_

TOTAL DEPTH 1321' MUD WEIGHT \_\_\_\_\_

BORE HOLE \_\_\_\_\_

INITIAL PROD: OIL \_\_\_\_\_ BPD, H<sub>2</sub>O \_\_\_\_\_ BPD, GAS \_\_\_\_\_ MCF

PRESENT PROD: OIL \_\_\_\_\_ BPD, H<sub>2</sub>O \_\_\_\_\_ BPD, GAS \_\_\_\_\_ MCF

PREVIOUS TREATMENT: DATE \_\_\_\_\_ TYPE \_\_\_\_\_ MATERIALS \_\_\_\_\_

TREATMENT INSTRUCTIONS: TREAT THRU TUBING ☐ ANNULUS ☐ CASING ☐ TUBING/ANNULUS ☐ HYDRAULIC HORSEPOWER ORDERED \_\_\_\_\_

7" intermediate 750 sr C with 2% CaCl<sub>2</sub>

CUSTOMER OR HIS AGENT STATES THE WELL IS IN PROPER CONDITION TO RECEIVE THE PRODUCTS, SUPPLIES, MATERIALS, AND SERVICES

THIS CONTRACT MUST BE SIGNED BEFORE WORK IS COMMENCED

As consideration, the above-named Customer agrees:

- To pay Halliburton in accord with the rates and terms stated in Halliburton's current price lists.
- Halliburton shall not be responsible for and Customer shall secure Halliburton against any liability for damage to property of Customer and of the well owner (if different from Customer), unless caused by the willful misconduct or gross negligence of Halliburton, this provision applying to but not limited to subsurface damage and surface damage arising from subsurface damage.
- Customer shall be responsible for and secure Halliburton against any liability for reservoir loss or damage, or property damage resulting from subsurface pressure, losing control of the well and/or a well blowout, unless such loss or damage is caused by the willful misconduct or gross negligence of Halliburton.
- Customer shall be responsible for and secure Halliburton against any and all liability of whatsoever nature for damages as a result of subsurface trespass, or any action in the nature thereof, arising from a service operation performed by Halliburton hereunder.
- Customer shall be responsible for and secure Halliburton against any liability for injury to or death of persons, other than employees of Halliburton, or damage to property (including, but not limited to, injury to the well), or any damages whatsoever, irrespective of cause, growing out of or in any way connected with the use of radioactive material in the well hole, unless such damage shall be caused by the willful misconduct or gross negligence of Halliburton.
- Halliburton makes no guarantee of the effectiveness of the products, supplies or materials, nor of the results of any treatment or service.
- Customer shall, at its risk and expense, attempt to recover any Halliburton equipment, tools or instruments which are lost in the well and if such equipment tools or instruments are not recovered, Customer shall pay Halliburton its replacement cost unless such loss is due to the sole negligence of Halliburton. If Halliburton equipment, tools or instruments are damaged in the well, Customer shall pay Halliburton the lesser of its replacement cost or the cost of repairs unless such damage is caused by the sole negligence of Halliburton. In the case of equipment, tools or instruments for marine operations, Customer shall, in addition to the foregoing, be fully responsible for loss of or damage to any of Halliburton's equipment, tools or instruments which occurs at any time after delivery to Customer at the landing until returned to the landing, unless such loss or damage is caused by the sole negligence of Halliburton.
- Because of the uncertainty of variable well conditions and the necessity of relying on facts and supporting services furnished by others, Halliburton is unable to guarantee the accuracy of any chart interpretation, research analysis, job recommendation or other data furnished by Halliburton. Halliburton personnel will use their best efforts in gathering such information and their best judgment in interpreting it, but Customer agrees that Halliburton shall not be responsible for any damages arising from the use of such information except where due to Halliburton's gross negligence or willful misconduct in the preparation or furnishing of it.
- Halliburton warrants only title to the products, supplies and materials and that the same are free from defects in workmanship and materials. THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS OR OTHERWISE WHICH EXTEND BEYOND THOSE STATED IN THE IMMEDIATELY PRECEDING SENTENCE. Halliburton's liability and Customer's exclusive remedy in any cause of action (whether in contract, tort, breach of warranty or otherwise) arising out of the sale or use of any products, supplies or materials is expressly limited to the replacement of such products, supplies or materials on their return to Halliburton or, at Halliburton's option, to the allowance to the Customer of credit for the cost of such items. In no event shall Halliburton be liable for special, incidental, indirect, punitive or consequential damages.
- Upon Customer's default in the payment of Customer's account 60 days after date of invoice, such account will thereafter be subject to interest until paid. In the event it becomes necessary to employ an attorney to enforce collection of such account, Customer agrees to pay all collection costs and attorney fees in the amount of 20 per cent of the amount of the unpaid account.
- Halliburton shall not be bound by any changes or modifications in this contract, except where such change or modification is made in writing by a duly authorized executive officer of Halliburton.

I HAVE READ AND UNDERSTAND THIS CONTRACT AND REPRESENT THAT I AM AUTHORIZED TO SIGN THE SAME AS CUSTOMER'S AGENT.

SIGNED [Signature] CUSTOMER

DATE \_\_\_\_\_

TIME \_\_\_\_\_ A.M. P.M.

We certify that the Fair Labor Standards Act of 1938, as amended, has been complied with in the production of goods and/or with respect to services furnished under this contract.

CUSTOMER



# HALLIBURTON SERVICES JOB SUMMARY

FORM 1012 R-2

HALLIBURTON  
DIVISION  
HALLIBURTON  
LOCATION

IN. Halliburton  
Hobbs

BILLED ON  
TICKET NO.

920904

## WELL DATA

FIELD	EUNICE	SEC.	YWP.	RNG.	COUNTY	LEA	STATE	N Mex
FORMATION NAME	TYPE							
FORMATION THICKNESS	FROM		TO					
INITIAL PROD. OIL	BPD.	WATER	BPD.	GAS	MCFD			
PRESENT PROD. OIL	BPD.	WATER	BPD.	GAS	MCFD			
COMPLETION DATE	MUD TYPE		MUD WT.					
PACKER TYPE	SET AT							
BOTTOM HOLE TEMP.	PRESSURE							
MISC. DATA	TOTAL DEPTH							

## JOB DATA

CALLED OUT	ON LOCATION	JOB STARTED	JOB COMPLETED
DATE 8-3-80	DATE 7-3-80	DATE 7-3-80	DATE 7-3-80
TIME 12:00	TIME 2:30	TIME 8:00	TIME 10:00

## PERSONNEL AND SERVICE UNITS

NAME	UNIT NO. & TYPE	LOCATION
J. ELIQUA	HT 400	Hobbs
B. MORGAN	3548	Hobbs
D. SUMMERS	Bulk	"

## TOOLS AND ACCESSORIES

TYPE AND SIZE	QTY.	MAKE
FLOAT COLLAR INSERT	15 A	Howe
FLOAT SHOE		
GUIDE SHOE 12A 2'	"	"
CENTRALIZERS		
BOTTOM PLUG		
TOP PLUG		
HEAD		
PACKER		
OTHER		

## MATERIALS

TREAT. FLUID	DENSITY	LB/GAL. API
DISPL. FLUID	DENSITY	LB/GAL. API
PROP. TYPE	SIZE	LB.
PROP. TYPE	SIZE	LB.
ACID TYPE	GAL.	%
ACID TYPE	GAL.	%
ACID TYPE	GAL.	%
SURFACTANT TYPE	GAL.	IN
HE AGENT TYPE	GAL.	IN
FLUID LOSS ADD. TYPE	GAL.-LB.	IN
GELLING AGENT TYPE	GAL.-LB.	IN
FRIC. RED. AGENT TYPE	GAL.-LB.	IN
BREAKER TYPE	GAL.-LB.	IN
BLOCKING AGENT TYPE	GAL.-LB.	
PERFPAC BALLS TYPE	QTY.	
OTHER		
OTHER		

DEPARTMENT	Cement
DESCRIPTION OF JOB	7" int
JOB DONE THRU: TUBING <input checked="" type="checkbox"/> CASING <input checked="" type="checkbox"/> ANNULUS <input type="checkbox"/> TBS./ANN. <input type="checkbox"/>	
CUSTOMER REPRESENTATIVE	X. Paul Patter
HALLIBURTON OPERATOR	J. M. ELIQUA
COPIES REQUESTED	

## CEMENT DATA

STAGE	NUMBER OF SACKS	TYPE	API CLASS	BRAND	BULK SACKED	ADDITIVES	YIELD CU. FT./SK.	MIXED LBS./GAL.
1	350		C		150	20% CaCl <sub>2</sub>	1.32	14.8

## PRESSURES IN PSI

CIRCULATING	DISPLACEMENT
BREAKDOWN	MAXIMUM
AVERAGE	FRACTURE GRADIENT
SHUT-IN: INSTANT	5-MIN.
	10-MIN.

## HYDRAULIC HORSEPOWER

ORDERED	AVAILABLE	USED
AVERAGE RATES IN BPM		
TREATING	DISPL.	OVERALL
CEMENT LEFT IN PIPE		
FEET	REASON	

## SUMMARY

PRESLUSH: BBL-GAL.	10	TYPE	H <sub>2</sub> O
LOAD & BKDN: BBL-GAL.		PAD: BBL-GAL.	
TREATMENT: BBL-GAL.		DISPL: BBL-GAL.	51.5
CEMENT SLURRY: BBL-GAL.	82.5		
TOTAL VOLUME: BBL-GAL.	12.3		

## REMARKS

Circ 10 SK cmt

CUSTOMER

PC 5 Prime Sales  
PRIME UNIT WITH  
7" int.  
7-3-80

# HALLIBURTON SERVICES JOB LOG

WELL NO.

LEASE

Benz Waterkill

TICKET NO.

920904

CUSTOMER

Chaparral Service Inc.

PAGE NO.

JOB TYPE

7" internal

DATE

7-3-80

FORM 2012 R-2

CHART NO.	TIME	RATE (BPM)	VOLUME (BBL) (GAL)	PUMPS		PRESSURE (PSI)		DESCRIPTION OF OPERATION AND MATERIALS
				T	C	TUBING	CASING	
	2:30							on location
	2:00	10	30		✓		300	24.0 PREFLUSH to BREAK CIRC.
	8:15	8			✓			START MIX CMT
	8:25	8	82		✓		300	CMT MIX SHUT DOWN RELEASE plug
	8:27	6			✓			start displ.
	8:40	6	51		✓		800	plug down RELEASE PRESSURE plug holding
								JOB complete
								Thank you
								J M Lique
								crew
								Z

CUSTOMER

# NEW MEXICO OIL CONSERVATION COMMISSION WELL LOCATION AND ACREAGE DEDICATION PLAT

Form C-102  
Supersedes C-120  
Effective 1-4-65

All distances must be from the outer boundaries of the Section.

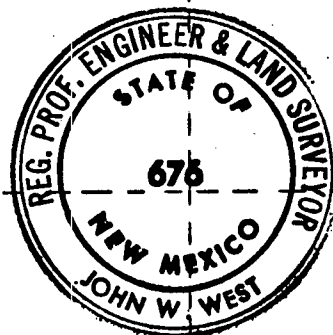
Operator <b>P &amp; S Brine Sales</b>			Lease <b>Eunice Well</b>		Well No. <b>1</b>
Unit Letter <b>O</b>	Section <b>34</b>	Township <b>21 South</b>	Range <b>37 East</b>	County <b>Lea</b>	
Actual Footage Location of Well:					
<b>630</b> feet from the <b>South</b> line and		<b>2427</b> feet from the <b>East</b> line			
Ground Level Elev. <b>3426.5</b>	Producing Formation		Pool	Dedicated Acreage  Acres	

1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.
2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).
3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?

☐ Yes ☐ No If answer is "yes," type of consolidation \_\_\_\_\_

If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) \_\_\_\_\_

No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.



## CERTIFICATION

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

Name \_\_\_\_\_

Position \_\_\_\_\_

Company \_\_\_\_\_

Date \_\_\_\_\_

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.

Date Surveyed

**June 12, 1980**

Registered Professional Engineer and/or Land Surveyor

*John W. West*

Certificate No **JOHN W. WEST 676**  
**PATRICK A. ROMERO 6463**  
**Ronald J. Eidson 3239**

0 330 660 990 1320 1650 1980 2310 2640 2970 3300 3630 3960 4290 4620 4950 5280 5610 5940 6270 6600



Pt 5 BRINT 57

BW-02

# 1

793 0811-3-3-1-1 2



#2

PES BW. 2 4/21/94

794 0811-3-3-1-1-2





#3

Pf 5 BW-2 4/21/94

794 0811-3-3-1-1 2



~~4~~ 4

PLS BW-2 4/21/94

794 0811-3-3-1-1 2



~~AS~~ PLS BW-2 4/21/94

793 0811-3-3-1-1 2



#6

PES BW-2 4/21/94

794 0811-3-3-1-1-2





#7 PLS BW-2 4/21/94

794 0811-3-3-1-1-2



#8

PES BW-2 4/21/94

794 0811-3-3-1-12



#9

PES

BW-002

4/21/94

794 0811-3-3-1-1 2



P&S Brine Sales

DP- 319

Dec. 1988

Tankage





P&S Brine Sales

DP-319

Dec 1988

Tankage/Pumphouse



P&S Brine Sales DP-319  
Spill Collection Pond

Dec 1988

A photograph showing a gravel area next to a large white cylindrical tank. In the background is a building with blue corrugated metal siding. A wooden post is on the left. A sign is in the foreground.

**PRIVATE USE ONLY**  
**CHAPARRAL SERVICE, INC.**  
IN CASE OF EMERGENCY  
CALL: (505) 394-2545  
POSTED NO TRESPASSING KEEP OUT

CHAPARRAL BRINE SL.

Nov 30, 1995  
~ 3:00 PM

TAKEN BY WAYNE PRICE  
NMOC

CH0.5H>33+01 NNN-04RU 999

BCW-02 #1



CHAPARRIL BRIB 5T

11/30/95

≈ 3:00 PM

BY WAYNE PRIES  
NMCA

CHAPARRIL 33+01 NNN-03AU 999

BW-02 #2

LWP





CHAPARRAL BW-02

SHOWS 3 DISCHARGE  
(OVERFLOW) LINES GOING  
TO PILE!

NO. 10H>33+01 NNN-15AU 999

BW-02 # 3

11/30/95

LWP



DW-02 # 4

11/30/95

LWP

<FIC. 1>33+01 NNN-15AU 000



BW-02 #5

11/30/95

LWP

<HCO.1P>33+01 NNN-19AU 000



plw-02 #6  
11/30/95  
LWP

<HIC.4>33+01 NNN-17AU 000





<MC.6>33+01 NNN-17AU 000

BW-02 # 17

11/30/95

LWP



BURIED LINE DISCHARGES  
LOBE OIL/WATER INTO/ INTO  
GROUND!

44-01.12P>33+01' NHH-21HU 888

BW-02 #8

11/30/95