

BW - 15

**GENERAL  
CORRESPONDENCE**

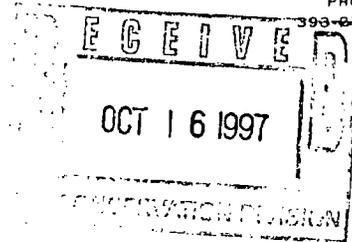
**YEAR(S):**

2004 → 1989

*Oil Reports and Gas Services, Inc.*

P.O. BOX 755  
HOBBS, NEW MEXICO 88241

October 10, 1997



Attn: Environmental Bureau  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

Re: C. W. Trainer  
Marathon Road Water Station  
Quarterly Report

Gentlemen:

The following is a quarterly report which lists by month the volumes of fluids injected and produced into the above referenced system for the quarter months of July, August & September 1997.

<u>Month</u>	<u>Injected Volume</u>	<u>Extraction Volume</u>
July 1997	514	450
August 1997	8017	7015
September 1997	4117	3602

Sincerely,

Gaye Heard-Manager for Oil Reports  
& Gas Services, Inc., Agent for  
C. W. Trainer

cc-C. W. Trainer  
OCD - Hobbs  
CWTMRWS.QTR



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

January 14, 2004

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7001 1940 0004 7923 4344**

Mr. CW Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

Re: Brine Well at Marathon Road Water Station BW-015  
660 FSL & 660 FEL Sec 21-19s-34e  
Lea County, New Mexico.

**Subject: Site Closure and Well Plugging Plan "Second Request"**

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) hereby requires that TOCO LLC submit a site closure and well plugging plan for the above referenced facility due to inactivity since approximately October of 1999. Please provide for OCD approval the requested plans by February 15, 2004.

If you have any questions please call me at 505-476-3487 or E-mail  
WPRICE@state.nm.us.

Sincerely;

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

June 24, 2003

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 3929 9864**

Mr. CW Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

Re: Brine Well at Marathon Road Water Station BW-015  
660 FSL & 660 FEL Sec 21-19s-34e  
Lea County, New Mexico.

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) hereby requires that TOCO LLC submit a site closure and well plugging plan for the above referenced facility due to inactivity since approximately October of 1999. Please provide for OCD approval the requested plans by August 1, 2003.

If you have any questions please call me at 505-476-3487 or E-mail  
WPRICE@state.nm.us.

Sincerely;

A handwritten signature in black ink, appearing to read "Wayne Price-Pet".

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

December 10, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357 7355**

Mr. CW Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

Re: Brine Well at Marathon Road Water Station BW-015  
660 FSL & 660 FEL Sec 21-19s-34e  
Lea County, New Mexico.

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) is in receipt of your letter dated November 27, 2001 requesting an extension to perform the mechanical integrity test, citing your system is presently shutdown and in the process of being evaluated to determine the possibility for utilization as a gas storage system. The OCD hereby approves of a 90-day extension and requires TOCO LLC to notify this office by March 11, 2002 of your intentions. Please note any work performed on this well or any test must be approved by the OCD.

If you have any questions please call me at 505-476-3487 or E-mail  
WPRICE@state.nm.us.

Sincerely;

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office

OIL REPORTS & GAS SERVICES, INC.  
1008 W. Broadway  
Hobbs, New Mexico 88240

Phone Numbers  
505-393-2727 - 505-393-2017

NOV 7 2003

October 10, 2003

Oil Conservation Division  
1220 S. St. Francis Dr  
Santa Fe, New Mexico 87504

Re: C. W. Trainer  
Marathon Road Water Station  
Quarterly Report

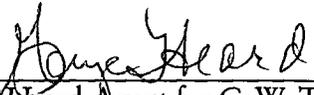
Attention: Environmental Bureau

Gentlemen:

The following is a quarterly report which lists by month the volumes of fluids injected and produced into the above referenced system for the quarter months of July, August & September 2003.

<u>Month</u>	<u>Injected Volume</u>	<u>Extraction Volume</u>
July 2003	0	0
August 2003	0	0
September 2003	0	0

Sincerely,

  
\_\_\_\_\_  
Gaye Heard-Agent for C. W. Trainer

cc: C. W. Trainer  
OCD - Hobbs

OIL REPORTS & GAS SERVICES, INC.

1008 W. Broadway

Hobbs, New Mexico 88240

RECEIVED

AUG 04 2003

Phone Numbers

505-393-2727 - 505-393-2017

OIL CONSERVATION  
DIVISION

July 10, 2003

Oil Conservation Division  
1220 S. St. Francis Dr  
Santa Fe, New Mexico 87504

Re: C. W. Trainer  
Marathon Road Water Station  
Quarterly Report

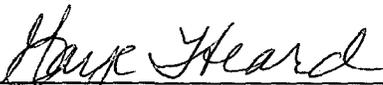
Attention: Environmental Bureau

Gentlemen:

The following is a quarterly report which lists by month the volumes of fluids injected and produced into the above referenced system for the quarter months of April, May & June 2003.

<u>Month</u>	<u>Injected Volume</u>	<u>Extraction Volume</u>
April 2003	0	0
May 2003	0	0
June 2003	0	0

Sincerely,

  
Gaye Heard-Agent for C. W. Trainer

cc: C. W. Trainer  
OCD - Hobbs

C W TRAINER  
P. O. Box 754 - Midland, Texas 79702  
Ph: 915\687-2505 - Fax: 915\687-2625

RECEIVED  
DEC 12 2001  
Environmental Bureau  
Oil Conservation Division

November 27, 2001

State of New Mexico Oil Conservation Division  
Attn: Wayne Price  
1220 South Francis Drive  
Santa Fe, NM 87505

Re: Pressure Test for Brine Supply Well at Marathon Water Station  
Sec 25 - 19S - 34E, Lea County, New Mexico

Dear Wayne,

I respectfully request an extension of time to perform this test. We started to test ourselves yesterday and we have a leak in the cellar.

We would like to temporarily abandon until we can determine if we will use it for a gas storage reservoir.

We realize the leak must be fixed in any event.

Sincerely,

  
C W Trainer

XC: Terri Jan Franke  
Day - w/ Oil Reports

**Price, Wayne**

---

**From:** Anderson, Roger  
**Sent:** Tuesday, November 27, 2001 4:36 PM  
**To:** Price, Wayne  
**Subject:** RE: Marathon Brine Station

It needs to be repaired if they opt not to submit plans for a gas storage system also

*Roger C. Anderson*

Environmental Bureau Chief  
Oil Conservation Division

BW-015

-----Original Message-----

**From:** Price, Wayne  
**Sent:** Tuesday, November 27, 2001 4:34 PM  
**To:** Anderson, Roger  
**Subject:** Marathon Brine Station

I called Ms. Trainer and she indicated they would not be ready for the test due to her not feeling well, bad weather and it was her birthday. I ask her to have CW Trainer call me.

According to Mr. Trainer they found a casing leak when they were pressuring up the well. He indicated fluids were observed coming up around the casing. He requested additional time to repair and re-test the well.

The reason they have not plugged the well is that they are considering converting this cavity into a gas storage system. He told me they were considering plugging this well and drilling a new well into the cavity. His partners or consultants had not made a final decision if this was feasible.

I told Mr. Trainer I will give him 30 days to submit plans for OCD approval. He understood that the existing well needs to be repaired and plugged properly if they opt not to submit plans for a gas storage system.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

MARATHON BRINE ST.      October 20, 2001  
BW-015

CERTIFIED MAIL  
RETURN RECEIPT NO. 5357 7515

## Attention: Brine Well Operators

Re: Mechanical Integrity Testing of Brine Supply Wells

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity test:

1. At least once every five years isolate the cavern formation from the casing/tubing annuals and hydrostatic fluid pressure test the casing at 300 psig for 30 minutes. New brine wells and wells being worked over will have to be tested in this manner before operations begin.
2. Annually perform an open hole cavern formation pressure test by pressuring up the formation with fluids to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. However, no operator may exceed surface injection or test pressures that may cause formation fracturing or system failures. Systems requiring test pressures less than 300 psig or methods that use testing media other than fluids, i.e. gas, must be approved by OCD prior to testing. Brine supply wells operating with isolation packers will have to pressure test both the cavern formation and casing/tubing annuals.

Please find enclosed an "OCD Brine Well Test Schedule November 2001" and "Brine Well Test Procedure Guidance Document" for this November 26 through November 30, 2001. Please have your well ready for testing on the date and time you are scheduled. Please refer to the Well Test Schedule attached for the Type of Test you are scheduled to perform. You must receive prior OCD approval to alter the scheduled time or type of test.

**What's New!! Please note that operators are required to have their pressure recording devices calibrated to 500 psig and 8-hour clock. See Guidance Document attached.**



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

Lori Wrotenbery  
Director  
Oil Conservation Division

MARATHON BRINE ST,      October 20, 2001  
BW-015

CERTIFIED MAIL  
RETURN RECEIPT NO. 5357 7515

## Attention: Brine Well Operators

Re:      Mechanical Integrity Testing of Brine Supply Wells

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity test:

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2. Annually perform an open hole cavern formation pressure test by pressuring up the formation with fluids to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. However, no operator may exceed surface injection or test pressures that may cause formation fracturing or system failures. Systems requiring test pressures less than 300 psig or methods that use testing media other than fluids, i.e. gas, must be approved by OCD prior to testing. Brine supply wells operating with isolation packers will have to pressure test both the cavern formation and casing/tubing annuals.

Please find enclosed an "OCD Brine Well Test Schedule November 2001" and "Brine Well Test Procedure Guidance Document" for this November 26 through November 30, 2001. Please have your well ready for testing on the date and time you are scheduled. Please refer to the Well Test Schedule attached for the Type of Test you are scheduled to perform. You must receive prior OCD approval to alter the scheduled time or type of test.

**What's New!! Please note that operators are required to have their pressure recording devices calibrated to 500 psig and 8-hour clock. See Guidance Document attached.**

Brine Well Operators  
Oct 20, 2001  
Page 2

**What's New!! All operators will provide to the OCD the maximum test pressure that will not cause formation fracturing or system failures.**

Operators will be responsible for providing equipment and shall bear all costs incurred. All tests must be witnessed by the New Mexico Oil Conservation Division. Operators failing to abide by the procedures, type of test, and time schedules listed herein may be required to shut-in their systems until OCD has an opportunity to approve and witness testing.

If you require any further information or assistance please do not hesitate to write or call me at 505-476-3487 or E-mail WPRICE@state.nm.us.

Sincerely Yours,



Wayne Price- Senior Envr. Engr..  
Environmental Bureau

cc: OCD District Offices

Attachments- 1. OCD Brine Well Test Schedule November 2001  
2. Brine Well Testing Procedure Guidance Document

## Brine Well Testing Procedure Guidance Document

- 1) The cavern and all piping must be filled, pressured up and stabilized for a period of at least 24 hours prior to testing. If this test requires a packer then casing/tubing annulus must be loaded with inert fluid 24 hours prior to testing.
- 2) Have manpower and equipment available for pressure test. Wellhead shall be prepared for test and all valves and gauges should be in good working order.
- 3) Pumps, tanks, external lines etc. must be isolated from the wellhead during test.
- 4) A continuous recording pressure device with an 8-hour clock (min) shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 500 psig. The operator must provide proof that the pressure-recording device has been calibrated within the past 6 months. **Note: Wells with packer installed: If this test requires both the casing/tubing annulus and cavern to be tested then two recording devices must be supplied or one recording device with two pins.**
- 5) A minimum of one pressure gauge shall be installed on the casing/tubing annulus.
- 6) OCD must witness the beginning of test (putting chart on) and ending of test (removing chart). At the end of test operator may be required to bleed-off well pressure to demonstrate recorder and gauge response.
- 7) The Operator will supply the following information on the pressure chart:
  - A. Company Name, Well Name, API #, Legal Location.
  - B. Test Procedure (1) Casing + Formation (2) Casing Test Only (3) Both (4) Other
  - C. Testing Media: Water, Gas, Oil, Etc.
  - D. Date, time started and ending.
  - E. Name (printed) and signature of company representative and OCD Inspector
- 8) **TEST ACCEPTANCE:** The OCD will use the following criteria in determining if a well has passed the Mechanical Integrity Test:
  - A. **Passes** if Zero Bleed-Off during the test.
  - B. **Passes** if Final Test Pressure is within  $\pm 1\%$  of Starting Pressure, if approved by the OCD inspector.
  - C. **Fails** if any Final Test Pressure is greater than  $\pm 1\%$  of Starting Pressure. Operators must investigate for leaks and demonstrate that mechanical integrity of the well(s) by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones. Wells shall not resume operations until approved by OCD.

**Note:** OCD recognizes that different operations, well designs, formation characteristics and field conditions may cause variations in the above procedures. If operator wishes to make or anticipate changes please notify the OCD for approval. All operators are responsible to notify OCD of any procedure that may cause harm to the well system or formation. Please be advised that OCD approval does not relieve any operator of liability should operations result in pollution of surface water, groundwater, or the environment.

OCD BRINE WELL TESTING SCHEDULE 2001				OCD Contact Wayne Price cell 505-660-1067					
Company	DP#	Facility Name	Date of Test	Start	Stop	Type of Test(s) Required	Contact Person	Telephone	FAX #/cell
Stearns Inc.	BW-013	Crossroads Area Crossroads	Mon 26-Nov-01	12 noon	4:00 PM	2 Pressure test cavern	L.A. Stearns	1-505-675-2356	1-505-675-2339
Marbob Brine Well Jims Water Ser.	BW-029 BW-005	Loco Hills Area M. Dodd "A" BW#1 SE of Artesia	Tue Tue 27-Nov 27-Nov	9:00 AM 10:00 AM	1:00 PM 2:00 PM	2 Pressure test cavern * Pressure test cavern or casing * 1,2 or 3	Doyle Davis Sammy Stoneman	748-5975 cell 1-505-748-1352	1-505-746-2523 1-505-748-3227
<b>Hobbs Area</b>									
Key Energy	BW-018	Truckers #2 (Hobbs)	Wen 28-Nov-01	8:00 AM	12 noon	2 Pressure test cavern	Royce Crowell	(505) 393-9171	505-910-4185
Scurlock-Permian	BW-012	Hobbs Station	Wen 28-Nov-01	9:00 AM	1:00 PM	2 Pressure test cavern	Richard Lentz	505-392-8212	392-6988
Zia Transportation	BW-018	Salty Dog-Ark Jct	Wen 28-Nov-01	10:00 AM	2:00 PM	2 Pressure test cavern	Piter Bergstein	806-741-1080	
Marathon Brine St	BW-015	Marathon Road	Wen 28-Nov-01	11:30 AM	3:30 PM	1 Pressure Test Casing	CW Trainer		
<b>Eunice Area</b>									
P&S Brine	BW-002	Eunice Brine Station	Thur 29-Nov-01	8:00 AM	12 noon	2 Pressure test cavern	Dink Prather	505-394-2545	394-2426
Key Simms-McCasland	BW-009A	Eunice Brine Station	Thur 29-Nov-01	9:00 AM	1:00 PM	2 Pressure test cavern	Royce Crowell	(505) 393-9171	505-910-4185
Yale E. Key (Old Goldstar)	BW-028	Eunice Brine Station	Thur 29-Nov-01	10:00 AM	2:00 PM	2 Pressure test cavern	Royce Crowell	1-505-394-2504	1-505-394-2560
<b>Carlsbad Area</b>									
I & W	BW-06	Carlsbad -Eugenie	Fri 30-Nov-01	8:00 AM	12 noon	2 Pressure test cavern	George Parchman	505-885-8663	885-8477
Key Energy-Carlsbad	BW-019	Rowland Truckers	Fri 30-Nov-01	9:00 AM	1:00 PM	2 Pressure test cavern	John Hutcheson	1-505-885-2053	cell 390-1833
Scurlock/Permian	BW-027 & 27A	Carlsbad Brine St.	Fri 30-Nov-01	10:00 AM	2:00 PM	2 Pressure test cavern	Richard Lentz	505-392-8212	392-6988
<b>Wells Already Tested in 2001</b>									
Gandy	BW-04	Wasserhund-Edison							
Gandy	BW-22	Tatum Brine St.							
Ray Westall	BW-21	Loco Hills Brine St.							
<b>Wells Being Repaired-</b>									
Chaparral SWD	BW-25	Salado Brine #2- Jal							
Notes:									
Type of Pressure Test:	1 Casing Test	Isolate cavern formation from the casing/tubing annulars and hydrostatic fluid pressure test the casing at 300 psig for 30 minutes.							
	2 Open Hole Cavern Pressure Test	Open hole cavern formation pressure test by pressuring up the formation with fluid to one and one-half times the normal operating pressure or 300 psig whichever is greater for four hours. Operators shall not exceed surface pressures that may cause formation fracturing or system failures. OCD prior to test shall approve test pressures below 300 psig and methods that use media other than fluids. Brine supply wells operating with packers will have to pressure both the cavern formation and casing/tubing annulars.							
	3 Others	Nitrogen-Brine Interface Test, Nitrogen Test, Etc.							



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

September 18, 2001

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357 7614**

Mr. CW Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

Re: Brine Well at Marathon Road Water Station BW-015  
660 FSL & 660 FEL Sec 21-19s-34e  
Lea County, New Mexico.

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) records indicate that TOCO LLC has not performed a mechanical integrity test since October 28, 1997. OCD received a letter dated October 4, 1999 indicating the well was inoperable and requested plugging information. OCD sent TOCO LLC a letter dated August 3, 2000 (copy enclosed) providing plugging procedure information and requesting a closure plan for the facility. As of to date, OCD has not received any information pertaining to this site.

OCD requires all brine well operators to demonstrate mechanical integrity at least once a year. Since OCD has not received the requested information, TOCO LLC will be notified and scheduled to perform a mechanical integrity test this year.

If you have any questions please call me at 505-476-3487.

Sincerely;

A handwritten signature in black ink, appearing to read "Wayne Price-Pet".

Wayne Price-Pet. Engr. Spec.

cc: OCD Hobbs Office

attachments-1



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

August 3, 2000

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 5185**

Mr. CW Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

Re: Closing of Discharge Plan and Plugging of Brine Well at Marathon Road Water Station BW-015 660 FSL & 660 FEL Sec 21-19s-34e, Lea County, New Mexico.

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) is in receipt of your plugging and closure request for the above captioned facility. You requested information on how the well should be plugged. The OCD will require the well be plugged and abandoned pursuant to OCD Rule 19 NMAC 15.D.202.

The recommended procedure for plugging is, remove the tubing and fill the casing annulars with a continuous cement plug from near the bottom shoe to surface. Please submit a form C-103 to the OCD Hobbs District for approval. As soon as we receive a copy of the approved C-103 this office will then issue approval for plugging of the well.

In addition, you should submit a closure plan for OCD approval pursuant to Item 21. of the Discharge Plan Approval Conditions. This plan should address surface equipment and any contamination remaining on-site. Please note, your current discharge plan is due to expire on April 08, 2002, therefore, OCD recommends that closure occur before this date, otherwise you will be required to re-permit.

Sincerely;

Wayne Price-Pet. Engr. Spec.

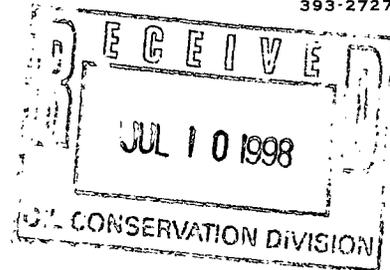
cc: OCD Hobbs Office

*Oil Reports and Gas Services, Inc.*

P.O. BOX 755  
HOBBS, NEW MEXICO 88241

PHONE NUMBERS  
393-2727 - 393-2017

July 8, 1998



Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: C. W. Trainer  
Marathon Road Water Station  
Quarterly Report

Attention: Environmental Bureau

Gentlemen:

The following is a quarterly report which lists by month the volumes of fluids injected and produced into the above referenced system for the quarter months of April, May & June 1998.

<u>Month</u>	<u>Injected Volume</u>	<u>Extraction Volume</u>
April 1998	0	0
May 1998	0	0
June 1998	0	0

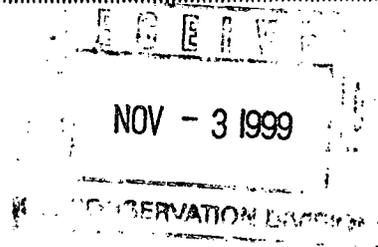
Sincerely,

  
\_\_\_\_\_  
Gaye Heard-Agent for C. W. Trainer

cc: C. W. Trainer  
OCD - Hobbs

TOCO, LLC - C W TRAINER  
Mailing Address: P. O. 754  
Midland, TX 79702-0754  
PHONE: 915/687-2505 or 800/305-6755

Physical Address: 50 W. Texas, Suite 670  
Midland, TX 79701  
FAX: 915/687-2625 or 800/496-1956



November 1, 1999

Gary Wink  
New Mexico Energy, Minerals, & Natural Resources Department  
1625 North French Drive  
Hobbs, NM 88240

Re: Closing of Discharge Plan and Plugging of Brine Well at MRWS  
660 FS & EL Sec 21 - 19S -34E, Lea County, New Mexico

Gary,

The tops Gary requested are Red Bed 70' - Santa Rosa, 810' - Rustler, 1805' -  
Salt, 1940' - TB 2200'.

I believe 50 sx at 1900, 50 sx at 800' and 50 sx at surface should be a good  
plan. Please give me your thoughts.

Sincerely,

C W Trainer

xc: Wayne Price w/OCD - Santa Fe  
Gaye Heard w/Oil Reports

C W TRAINER  
P. O. Box 754 - Midland, TX 79702  
Ph: 915\687-2505 Fax: 915\687-2625

October 4, 1999

OCT 7 1999

Mr. Wayne Price  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, NM 87505

Dear Mr. Price,

Thanks for notifying us our Marathon Road Water Station Brine well is scheduled to be tested October 29, 1999.

We have not used this well for a year or so because we have been unable to fish the parted tubing.

We need to plug it.

I would like to talk to you about how to plug it. It has 5-1/2" casing with cement circulated to the Rustler formation.

Don't you think 100' of cement in top will be ok?

Sincerely,



C W Trainer

4  
120  
TOCO, LLC  
P.O. BOX 754  
MIDLAND, TX 79702

YOUR UNITED WAY, PLEASE



Mr. Wayne Price  
New Mexico Oil Conserv. Div.  
2040 South Pacheco Street  
Santa Fe, NM 87505

57305-3472 57





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

September 11, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z 357 870 151**

**Mr. C.W. Trainer**  
**P.O. Box 888**  
**Hobbs, New Mexico 88241**

RETURNED RE-SENT Z 274 520 508

Re: Mechanical Integrity Testing of Brine Supply Wells

Dear Mr. C.W. Trainer:

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring there are no leaks in the tubing, casing, or packer, and injected/produced fluids are confined within the piping and injection zones.

The Oil Conservation Division (OCD) requires operators of brine supply wells to perform the following mechanical integrity test:

1. At least once every five years isolate the cavern formation from the casing/tubing annuals and pressure test the casing at 300 psig for 30 minutes. New brine wells and wells being worked over will have to be tested in this manner before operations begin.
2. Annually perform an open hole cavern formation pressure test by pressuring up the formation one and one-half times the normal operating pressure (not to exceed formation fracture pressure) or 300 psig whichever is greater for four hours. Brine supply wells operating with packers will have to pressure both the cavern formation and casing/tubing annuals.

**Please find enclosed an OCD Brine Well Test Schedule and Test Procedure for this Fall October 25, 1999 through November 2, 1999. Please have your well ready for testing on the date and time you are schedule.** Operators will be responsible for providing equipment and shall bear all costs incurred. All test must be witnessed by the New Mexico Oil Conservation Division.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD District Offices  
attachments- OCD Brine Well Test Schedule & Brine Well Testing Procedure Guidance Document

OCD BRINE WELL TEST SCHEDULE

FALL OF 1999

Company	DP#	Facility Name	Date of Test	Start	Stop	Type of Test(s) Required
P&S Brine	** BW-002	Eunice Eunice Water ST.	October 25 1999	8 am	12 noon	Isolate cavern & pressure test casing + Cavern survey***
Simms-McCasland	** BW-009A	Eunice Brine Station	October 25 1999	9:30 am	1:30 pm	Isolate cavern & pressure test casing + Cavern survey***
Goldstar	BW-028	Eunice Brine Station	October 25 1999	11 am	3 pm	Pressure test cavern
Key Energy	** BW-018	Rowland Truckers #2	October 26 1999	8 am	12 noon	Pressure test cavern + Cavern survey***
Scurlock-Permian	** BW-012	Hobbs Station	October 26 1999	9:30 am	1:30 pm	Isolate cavern & pressure test casing + Cavern survey***
Salty Dog, Inc.	** BW-008	Arkansas-Jct	October 26 1999	11 am	3 pm	Pressure test cavern + Cavern survey***
Quality Oil (Salado Brine Sales)	** BW-025	Salado Brine St. #2	October 27 1999	8 am	12 noon	Isolate cavern & pressure test casing + Cavern survey***
Conoco	** BW-001	Warren -McKee #3	October 27 1999	1:30 pm	5:30 pm	Isolate cavern & pressure test casing
Conoco	** BW-001	Warren -McKee #4	October 27 1999	1:30 pm	5:30 pm	Isolate cavern & pressure test casing
Quality Brine	BW-022	Tatum Water St.	October 28 1999	9 am	1 pm	Pressure test cavern
Kenneth Tank Service	BW-013	Crossroads	October 28 1999	11 am	3 pm	Pressure test cavern
WasserHaun	BW-004	Buckeye	October 29 1999	9 am	1 pm	Pressure test cavern
Marathon Brine St.	BW-015	Marthon Road	October 29 1999	11 am	3 pm	Pressure test cavern
Loco Hills Brine	BW-021	Loco Hills	November 1 1999	9 am	1 pm	Pressure test cavern
Jims Water Ser.	BW-005	SE of Artesia	November 1 1999	11 am	3 pm	Pressure test cavern
I&W Trucking	BW-006 &6A	Carlsbad Yard	November 2 1999	8 am	12 noon	Pressure test cavern
Key Energy-Carlsbad	BW-019	Rowland Truckers	November 2 1999	9:30 am	1:30 pm	Pressure test cavern
Scurlock/Permian	** BW-027 &27A	Carlsbad Brine St.	November 2 1999	11 am	3 pm	Isolate cavern & pressure test casing + Cavern survey***
Notes:						
** Discharge Plan up for renewal						
*** Cavern Surveys are Discharge Plan Requirments Companies have the option to perform now are at a later date approved by OCD.						



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

November 24, 1997

Mr. C.W. Trainer  
P.O. Box 888  
Hobbs, New Mexico 88241

RE: Mechanical Integrity Testing of Brine Supply Wells

Dear Mr. C.W. Trainer:

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

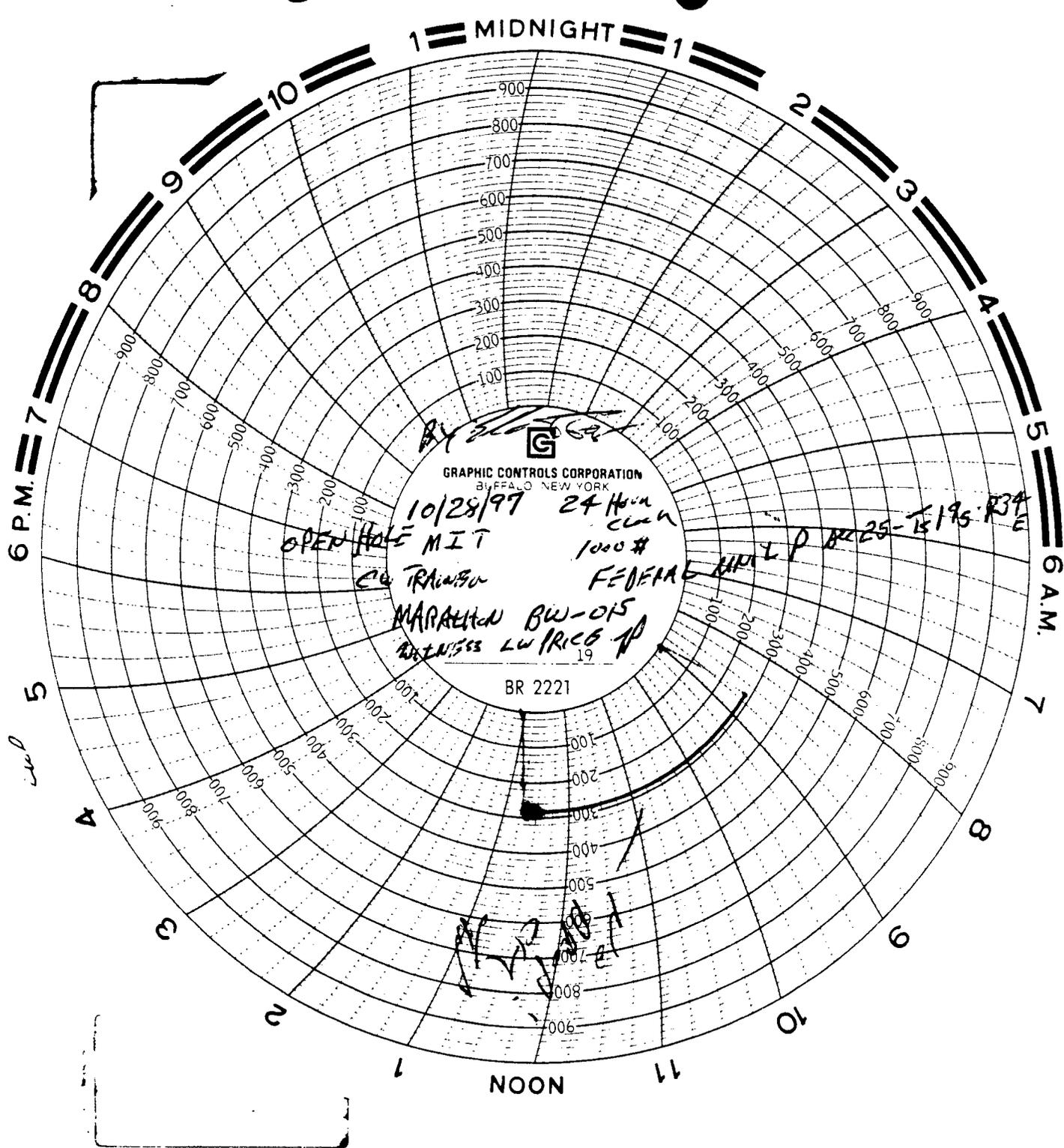
On behalf of the New Mexico Oil Conservation Division, I would like to thank you for your time and cooperation during the testing. If you have any questions, please contact me at (505) 827-7155.

Sincerely,

A handwritten signature in cursive script that reads "Mark Ashley".

Mark Ashley  
Geologist

Attachment



GRAPHIC CONTROLS CORPORATION  
BUFFALO, NEW YORK

10/28/97 24 Hour  
OPEN HOLE MIT  
CG TRAINING  
MARATHON BW-015  
BUSINESS LW PRICE 19

BR 2221

BY [Signature]

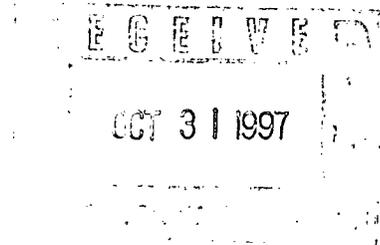
FEDERAL [Signature] 10/25-15/95 R34

[Signature]

**Wayne Price**

---

**From:** Wayne Price  
**Sent:** Wednesday, October 29, 1997 2:55 PM  
**To:** Mark Ashley  
**Cc:** Chris Williams  
**Subject:** FW: Marthon Brine ST BW-015 MIT  
**Importance:** High



Mark,  
I failed to mention there is a second chart I included, it was ran 24 hours before our test, it looks good also.

-----  
**From:** Wayne Price  
**Sent:** Wednesday, October 29, 1997 2:53 PM  
**To:** Mark Ashley  
**Cc:** Chris Williams  
**Subject:** Marthon Brine ST BW-015 MIT  
**Importance:** High

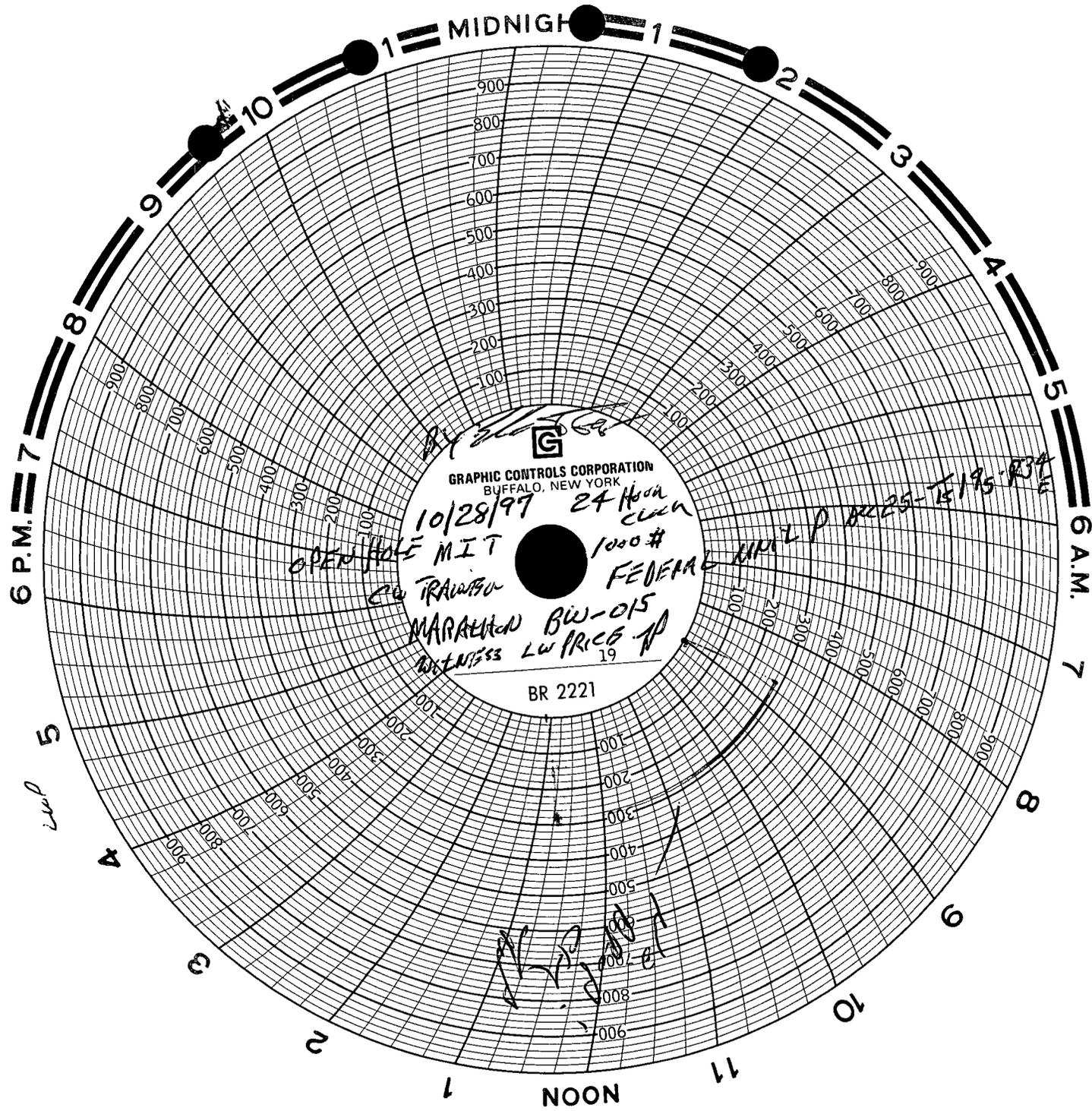
Dear Mark,

I witnessed, looks good. I am dropping in the mail your charts, we made copies for us.

I had them disconnect pressure chart and install gauge, reconnect. pressure held ok. Made sure all pumps were isolated & shut-down during test.

After four hours, I had then open up brine valve to make sure system was pressure on both sides. OK





GRAPHIC CONTROLS CORPORATION  
 BUFFALO, NEW YORK

10/28/97 24 HOUR  
 OPEN FILE MIT 1000#  
 CU TRAWASU

MARATHON BW-015  
 BUSINESS LW PRICE 19

FEDERAL MIL P 10/25-15/95-R34

BR 2221

cup

*[Handwritten scribbles]*



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87508  
(505) 827-7131

August 12, 1997

**Certified Mail**

**Return Receipt No. P-288-258-949**

Mr. C. W. Trainer  
TOCO LLC  
P.O. Box 754  
Midland, Texas 79702

**RE: Mechanical Integrity Testing of Brine Supply Wells  
Discharge Plan Renewal Test  
Marathon Road Water Station BW-015  
Lea County, New Mexico**

Dear Mr. Trainer:

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring that there are no leaks in the tubing, casing, or packer, and that the injected fluid is confined within the injection zone through proper cementing.

All brine wells that operate without a packer will be required to have an annual open hole pressure test equal to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for four hours with a maximum of 10 percent bleed-off allowed. Every five years or at the time of discharge plan renewals they will be required to have an open hole pressure test equal to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for four hours with zero bleed-off.

All brine wells that operate with a packer will be required to have an annual casing/tubing annulus pressure test equal to 300 psi for 30 minutes.

Operators will be responsible for providing equipment and shall bear all costs incurred. The date and time of all tests will be scheduled and witnessed by the New Mexico Oil Conservation Division.

Please have your well ready for testing on September 16, 1997 at 12:00 PM as outlined below.

For brine wells operating without a packer:

- 1) The cavern must be pressured up and stabilized for a period of at least 24 hours prior to testing.

Mr. C. W. Trainer  
 August 12, 1997  
 Page 2

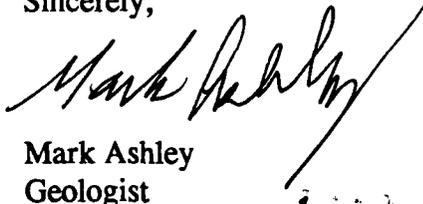
- 2) The system shall be tested to 1.5 times the normal operating pressure or 300 psi, whichever is greater, for a period of four hours. A maximum of 10 percent bleed-off will be allowed for annual tests. Testing conducted every five years or at the time of discharge plan renewal will have zero bleed-off.
- 3) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psi.
- 4) Have well head prepared for test. All valves should be in good working order.
- 5) All gauges shall be in good working order.
- 6) Have manpower and equipment available for pressure test.

For brine wells operating with a packer:

- 1) Have the casing/tubing annulus and tubing loaded with inert fluid prior to testing.
- 2) The casing/tubing annulus shall be tested to 300 psi for 30 minutes.
- 3) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psi.
- 4) Have well head prepared for test. All valves should be in good working order.
- 5) All gauges shall be in good working order.
- 6) Have manpower and equipment available for pressure test.

If you have any questions regarding this matter, please feel free to contact me at (505) 827-7155.

Sincerely,



Mark Ashley  
 Geologist

P 288 258 949

US Postal Service  
**Receipt for Certified Mail**  
 No Insurance Coverage Provided.  
 Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 9 AM	Date 3-5-97
<u>Originating Party</u> MARK ASHLEY		<u>Other Parties</u> C.W. TRAINER	
<u>Subject</u> MARTIN ROAD BRINE STATION      BW-15			
<u>Discussion</u> BRINE RUNOFF TO THE SOUTH $\approx$ 1/10 MILE. BELOW GAGE TESTING OF LINES. MOUNDING OF CLOSED BRINE PIT.			
<u>Conclusions or Agreements</u> MR. TRAINER AGREED TO ADDRESS ALL THESE ISSUE WITHIN 30 DAYS.			
<u>Distribution</u>		Signed Mark Ashley	

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/29/96  
or cash received on \_\_\_\_\_ in the amount of \$ 50.00

from Marathon Road Water Station

for Marathon Water Station BW-015

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Filing Name) (DP No.)

Submitted to ASD by: R. Chudum Date: 12/11/96

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee XR New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.  
Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

MARATHON ROAD WATER STATION  
P.O. BOX 754  
MIDLAND, TEXAS 79702

FOUNDERS BANK OF ARIZONA  
Scottsdale, Arizona  
91-534/1221

10/29/1996

PAY TO THE ORDER OF NMED Water Quality Management

\$ \*\*50.00

Fifty and 00/100..... DOLLARS

NMED Water Quality Management  
2040 South Pacheco St.  
Santa Fe, NM 87505

[Signature]

AUTHORIZED SIGNATURE

MEMO Renew Discharge plan BW-015 Filing Fee



TOCO, LLC  
C W TRAINER - RUTH MOORE  
P.O. BOX 754  
MIDLAND, TEXAS 79702

PHONE 915/687-2505 or 800/305-6755  
FAX 915/687-2625 or 800/496-1956

06 NO - 11 8 52

October 30, 1996

NMED-Water Quality Management  
Mark Ashley  
2040 South Pacheco St  
Santa Fe, NM 87505

Re: Renewal of Discharge Plan BW-015 - Marathon Water Station

Enclosed is our completed application and the \$50 filing fee. The only change in our facility during the past 5 years is that we abandoned and covered up our large brine storage pit. We are now able to furnish our brine directly from the well to the 65' tall loading tank.

Please let us know if anything more is needed for this renewal.

Sincerely,

  
C W Trainer

Western Gas Resources, Inc.

12200 N. Pecos Street  
Denver, Colorado 80234  
Telephone (303) 452-5603

199

31-OCT-96 7762

NEW MEXICO ENVIRONMENTAL DEPARTMENT

CHECK#

10007266

Invoice No.

Inv. Date

Description

Gross

Discount

Net Amt.

30-OCT-96 30-OCT-96

FILING FEE

50.00

50.00

San Juan River Plant  
Discharge Plan Renewal Fee for  
Filing

# Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled  
**Notice Of Publication**

~~and numbered~~ **XXXX** in the  
~~County of Lea~~  
~~County, New Mexico~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~once each week~~ **one (1) day** ~~same day of the week~~ for **one (1) day** ~~consecutive weeks~~, beginning with the issue of **November 13**, 19 **96** and ending with the issue of **November 13**, 19 **96**

And that the cost of publishing said notice is the sum of \$ **31.20** which sum has been (Paid) ~~Assessed~~ as Court Costs

*Joyce Clemens*  
Subscribed and sworn to before me this **21st** day of **November**, 19 **96**  
*Jean Lemay*  
Notary Public, Lea County, New Mexico  
My Commission Expires **Sept. 28**, 19 **98**

*OK MA 12-4-96*

## LEGAL NOTICE NAME OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(BW-015)-Marathon Road Water Station, C.W. Tralner, (915) 687-2505, P.O. Box 754, Midland, Texas, 79702 has submitted an application for renewal of its previously approved discharge plan or the Marathon Road Water Station located in the SW/4 SE/4 of Section 25, Township 19 South, Range 34 East NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1,900 to 2,400 feet and brine water is extracted with an average total dissolved solids concentration of 321,080 mg/l. Ground water most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to 3,500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

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. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. 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 discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of November, 1996.  
STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY,  
Director  
SEAL  
Published in the Lovington Daily Leader  
November 13, 1996.

# The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO OIL CONSERVATION

AD NUMBER: 578333

ACCOUNT: 56689

RECEIVED

LEGAL NO: 60738

P.O. #96199002997

NOV 18 1996

Environmental Bureau  
Oil Conservation Division

171 LINES once at \$ 68.40

Affidavits: 5.25

Tax: 4.60

Total: \$ 78.25

### AFFIDAVIT OF PUBLICATION

#### NOTICE OF PUBLICATION

#### STATE OF NEW MEXICO

#### ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

#### OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(BW-015) - Marathon Road Water Station, C.W. Trainer, (915) 687-2505, P.O. Box 754, Midland, Texas, 79702 has submitted an application for renewal of its previously approved discharge plan for the Marathon Road Water Station located in the SW/4 SE/4 of Section 25, Township 19 South, Range 34 East NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1,900 to 2,400 feet and brine water is extracted with an average total dissolved solids concentration of 321,080 mg/l. Ground water most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to 3,500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. 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 discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of November 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION  
WILLIAM J. LEMAY,  
Director  
Legal #60738  
Pub. November 13, 1996

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 60738 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13th day of NOVEMBER 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

Betsy Perner  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
13th day of NOVEMBER A.D., 1996

OK AA  
11-18-96



OFFICIAL SEAL

Candace C. Ruiz

NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 9/29/99

Candace C. Ruiz



November 8, 1996

**LOVINGTON DAILY LEADER**  
**P. O. Box 1717**  
**Lovington, New Mexico 88260**

**RE: NOTICE OF PUBLICATION**

**ATTN: ADVERTISING MANAGER**

*Dear Sir/Madam:*

*Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.*

*Immediately upon completion of publication, please send the following to this office:*

1. ***Publisher's affidavit in duplicate.***
2. ***Statement of cost (also in duplicate.)***
3. ***CERTIFIED invoices for prompt payment.***

*We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.*

*Please publish the notice no later than* November 15, *1996.*

*Sincerely,*

*Sally Martinez*  
Sally E. Martinez  
Administrative Secretary

*Attachment*

PS Form 3800, April 1995

P 269 262 824

US Postal Service <b>Receipt for Certified Mail</b> No Insurance Coverage Provided. Do not use for International Mail. (See reverse)	
Sent to	Lovington Daily Leader
Post Office State ZIP Code	P.O. Box 1717 Lovington, NM 88260
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>mmk</i>

**NOTICE OF PUBLICATION**

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

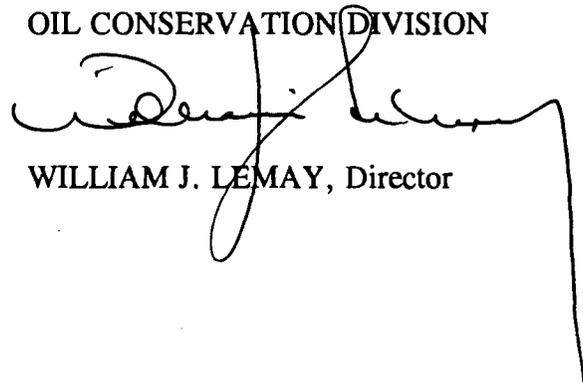
**(BW-015) - Marathon Road Water Station, C.W. Trainer, (915) 687-2505, P.O. Box 754, Midland, Texas, 79702 has submitted an application for renewal of its previously approved discharge plan for the Marathon Road Water Station located in the SW/4 SE/4 of Section 25, Township 19 South, Range 34 East NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1,900 to 2,400 feet and brine water is extracted with an average total dissolved solids concentration of 321,080 mg/l. Ground water most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to 3,500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

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. The discharge plan renewal application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan renewals or modifications, 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 the information in the discharge plan renewal application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of November 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

TOCO, LLC

C W TRAINER - R K MOORE

P.O. BOX 754

MIDLAND, TEXAS 79702

WATER CONSERVATION DIVISION

PHONE 915/687-2505 or 800/305-6755

FAX 915/687-2625 or 800/496-1956

96 NO 4 PM 8 52

October 30, 1996

NMED-Water Quality Management

Mark Ashley

2040 South Pacheco St

Santa Fe, NM 87505

Re:Renewal of Discharge Plan BW-015 - Marathon Water Station

Enclosed is our completed application and the \$50 filing fee. The only change in our facility during the past 5 years is that we abandoned and covered up our large brine storage pit. We are now able to furnish our brine directly from the well to the 65' tall loading tank.

Please let us know if anything more is needed for this renewal.

Sincerely,



C W Trainer

Er Environmental Bureau  
Oil Conservation Division ent  
2040 S. Pacheco  
Santa Fe, NM 87505

**DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES**  
(Refer to OCD Guidelines for assistance in completing the application.)

NEW  RENEWAL

I. FACILITY NAME: Marathon Road Water Station

II. OPERATOR: TOCO LLC  
ADDRESS: Box 754, Midland, TX 79702

CONTACT PERSON: C W Trainer or R. Keith Moore PHONE: 915 687 2505

III. LOCATION: SE/4     /4 Section 25 Township 19S Range 35E  
*Submit large scale topographic map showing exact location.*

IV. Attach the name and address of the landowner of the facility site. Bureau of Land Mgmt.

V. Attach a description of the types and quantities of fluids at the facility.  
fresh water and brine water

VI. Attach a description of all fluid transfer and storage and fluid and solid disposal facilities.  
2 65' tall x 8' tanks and one fresh water lined pit.

VII. Attach a description of underground facilities (i.e. brine extraction well).  
One brine extraction well 1/2 mile east of water station.

VIII. Attach a contingency plan for reporting and clean-up of spills or releases.  
Plan to pipe any brine spills into the large fresh water pit & recycle thru well.  
*Use of pit not approved. Will pump out hose spill vats with tank truck.*

IX. Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water.  
No impact

X. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XI. CERTIFICATION

*I hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that 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.*

Name: C W Trainer Title: Owner

Signature: *CW Trainer* Date: 10-30-96  
10 30 96

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

OIL CONSERVATION DIVISION  
RECEIVED

'96 DEC 17 AM 8 52

## Lynx Petroleum Consultants, Inc.

P. O. Box 1979  
3325 Enterprise Drive  
Hobbs, New Mexico 88241

505 392-6950 Fax: 505 392-7886

October 15, 1996

Attention: Environmental Bureau  
Oil Conservation Division  
2040 South Pacheco St.  
Santa Fe, NM 87505

Re: Change of Regulatory Agent for Marathon Road Water Station  
Operator

Gentlemen:

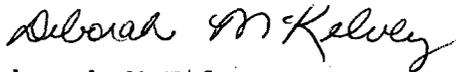
This is to notify you that effective immediately Lynx Petroleum and Deborah McKelvey of Lynx Petroleum will no longer serve as Regulatory Agents for TOCO, L.L.C. or C. W. Trainer Operating Co. Oil Reports and Gas Services will assume the role of Regulatory Agent; their address and phone number are P.O. Box 755, Hobbs, NM 88241, 505-393-2727.

It is our understanding that TOCO, L.L.C. and C. W. Trainer Operating Co. will retain their current address of P.O. Box 888, Hobbs, NM 88241.

If you have any questions, please do not hesitate to call me at 505-392-6950.

Sincerely,

LYNX PETROLEUM CONSULTANTS, INC.



Deborah McKelvey

/dm



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

October 4, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-858**

Mr. Keith Moore  
C.W. Trainer  
P.O. Box 888  
Hobbs, New Mexico 88241

**RE: Discharge Plan BW-015 Renewal Notice  
Marathon Road Water Station  
Lea County, New Mexico**

Dear Mr. Moore:

On May 16, 1985, the groundwater discharge plan, BW-015, for the C. W. Trainer (Trainer) Marathon Road Water Station located in the SW/4, SE/4 of Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). The discharge plan was subsequently renewed on April 8, 1992. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved pursuant to Section 3109 for a period of five years. The approval will expire on April 8, 1997.

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 5101.G., if an application for renewal is submitted at least 180 days before the discharge plan expires ( on or before October 8, 1996), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Trainer has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

Mr. Keith Moore  
October 4, 1996  
Page 2

The discharge plan renewal application for the **Marathon Road Water Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690.00 for Brine Extraction Facilities. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** The following information is enclosed: Application form, Guidelines, and WQCC regulations.

If Trainer no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If Trainer has any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office

P 288 258 858

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

PS Form 3800 April 1995



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

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

August 16, 1996

**Certified Mail**

**Return Receipt No. P-288-258-824**

Mr. Keith Moore  
C.W. Trainer  
P.O. Box 888  
Hobbs, New Mexico 88241

**RE: Mechanical Integrity Testing of Brine Supply Wells  
Annual Test  
Marathon Road Water Station BW-015  
Lea County, New Mexico**

Dear Mr. Moore:

The Underground Injection Control Program of the Federal Safe Drinking Water Act requires that operators demonstrate mechanical integrity of all injection wells by ensuring that there are no leaks in the tubing, casing, or packer, and that the injected fluid is confined within the injection zone through proper cementing.

All brine wells that operate without a packer will be required to have an annual open hole pressure test equal to 1.5 times the normal operating pressure or 300 psig, whichever is greater, for four hours with a maximum of 10 percent bleed-off allowed. Every five years or at the time of discharge plan renewals they will be required to have an open hole pressure test equal to 1.5 times the normal operating pressure or 300 psig, whichever is greater, for four hours with zero bleed-off.

All brine wells that operate with a packer will be required to have an annual casing/tubing annulus pressure test equal to 1.5 times the normal operating pressure or 300 psig, whichever is greater, for four hours.

Operators will be responsible for providing equipment and shall bear all costs incurred. The date and time of all tests will be scheduled and witnessed by the New Mexico Oil Conservation Division.

Please have your well ready for testing on September 18, 1996 at 7:00 AM as outlined below.

Mr. Keith Moore  
August 16, 1996  
Page 2

For brine wells operating without a packer:

- 1) The cavern must be pressured up and stabilized for a period of at least 24 hours prior to testing.
- 2) The system shall be tested to 1.5 times the normal operating pressure or 300 psig, whichever is greater, for a period of four hours. A maximum of 10 percent bleed-off will be allowed for annual tests. Testing conducted every five years or at the time of discharge plan renewal will have zero bleed-off.
- 3) A continuous recording pressure chart with an 8 hour clock shall be installed on both the casing/tubing annulus and tubing. The pressure range shall not be greater than 1,000 psig.
- 4) Have well head prepared for test. All valves should be in good working order. All casing/tubing annulus and tubing valves shall be open.
- 5) All gauges shall be in good working order.
- 6) Have manpower and equipment available for pressure test.

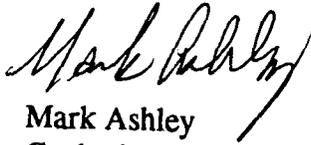
For brine wells operating with a packer:

- 1) Have the casing/tubing annulus and tubing loaded with inert fluid prior to testing.
- 2) The casing/tubing annulus shall be tested to 1.5 times the normal operating pressure or 300 psig, whichever is greater, for four hours.
- 3) A continuous recording pressure chart with an 8 hour clock shall be installed on the casing/tubing annulus. The pressure range shall not be greater than 1,000 psig.
- 4) Have well head prepared for test. All valves should be in good working order.
- 5) All gauges shall be in good working order.
- 6) Have manpower and equipment available for pressure test.

Mr. Keith Moore  
August 16, 1996  
Page 3

If you have any questions regarding this matter, please feel free to contact me at (505) 827-7155.

Sincerely,



Mark Ashley  
Geologist

P 288 258 824

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

PS Form 3800, April 1995

OIL CONSERVATION DIVISION  
RECEIVED

'93 JUN 23 AM 9 29

June 18, 1993

Kathy Brown  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504-2088

RE: C.W. Trainer  
Marathon Road Water Station (BW-15)  
Pond Closure

Dear Kathy:

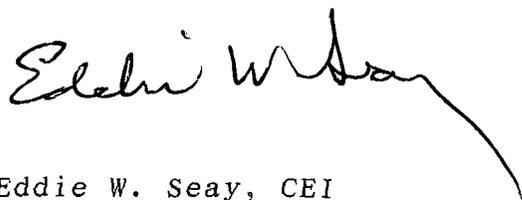
Please accept this letter as the final report for C.W. Trainer, Marathon Road Water Station Brine Pond Closure, as approved.

1. All fluid was removed first and pit allowed to dry for a couple of weeks. Pond was flushed with fresh water to dissolve salt build up on bottom and again all fluid was removed and was allowed to dry. This process continued until almost all material was removed, with only a small amount of sand left to hold bottom liner down.
2. One soil sample was taken from under the liner bottom at the SE corner of the pond. Sample was tested for general chemistry by Cardinal Lab, a copy of analysis is enclosed.
3. What was left of the liner was cut at the top and folded into the bottom.
4. Area was backfilled and excavated.
5. Pond area was disked and seeded with BLM seed mixture.
6. A fresh water sprinkler system is being installed to enhance full restoration of the area.
7. Also additional work at loading area of brine system was done to prevent accidental runoff onto closure area. Entire loading area was graded and cleaned.

The final closure was completed the first week of June. I did notify OCD as required.

I thank you for your time and consideration in this matter. If additional information is needed, please call.

Sincerely,

A handwritten signature in cursive script that reads "Eddie W. Seay". The signature is written in black ink and has a long, sweeping underline that extends to the right.

Eddie W. Seay, CEI  
601 W. Illinois  
Hobbs, NM 88240  
(505)392-2236





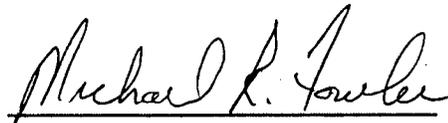
PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TEXAS 79603  
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

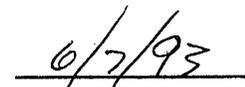
CHEMICAL ANALYSIS OF SOIL

Company : C.W. Trainer  
City, St.: 8090 E. Kalil Dr., Scottsdale, AZ 85260  
Proj. Name: Marathon Road Pit Liner  
Location : Lea County, NM  
Sample 1 : Under Pit Liner - Pit #1  
Sample 2 :  
Sample 3 :  
Sample 4 :

Lab #: H1239  
Date : 6/7/93

PARAMETER	RESULT (mg/kg)			
	1	2	3	4
pH	9.08			
Hardness (CaCO <sub>3</sub> )	140			
Calcium (Ca)	90			
Magnesium (Mg)	50			
Nitrate (NO <sub>3</sub> )	3.65			
Sulfate (SO <sub>4</sub> )	208			
Chloride (Cl)	6500			
Ortho Phosphate (PO <sub>4</sub> )	1.1			

  
Michael R. Fowler

  
Date

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

April 22, 1993

CERTIFIED MAIL

RETURN RECEIPT NO. P-677-241-978

Mr. C.W. Trainer  
8090 East Kalil Dr.  
Scottsdale, Arizona 85260

**RE: Approval of Closure of Brine Storage Pond  
Marathon Road Water Station (BW-15)  
Lea County, New Mexico**

Dear Mr. Trainer:

The New Mexico Oil Conservation Division (OCD) has received the March 29, 1993 risk analysis, submitted by Eddie W. Seay, on your behalf, for closure of the single-lined brine storage pond at the Marathon Road Water Station located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. The risk analysis demonstrates that there is no protectable groundwater of foreseeable beneficial use beneath the facility. Closure of the leaking brine storage pond in accordance with the February 8, 1993, closure plan will eliminate the source of any further contamination and allow natural processes to remediate the contaminates.

The OCD hereby approves closure of the above referenced brine storage pond with the following conditions:

1. All brine and solids will be removed prior to closure of the pond.
2. One soil sample will be taken approximately one foot beneath the liner. The sample will be analyzed for general chemistry.

Mr. C.W. Trainer  
April 22, 1993  
Page 2

3. The liner will be folded in prior to backfilling the pond.
4. Clean materials will be used to backfill the excavation.
5. The area will be mounded to prevent standing or pooling of water. The area will then be reseeded and restored to its natural condition.
6. A completion report will be submitted to the OCD Santa Fe Office within 60 days of completion of closure of the pond. The closure plan will include the analytical results for the soil sample taken beneath the pond liner.

Please contact the OCD at least 7 days prior to closure of the pond so that the OCD has the opportunity to have a representative present.

Please be advised that OCD approval does not relieve you of liability, if, during closure activities it is determined that contamination exists which is beyond the scope of the plan. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

If you have any questions please feel free to contact me at (505) 827-5884.

Sincerely,



Kathy M. Brown  
Geologist

xc: Jerry Sexton, OCD Hobbs Office  
Eddie W. Seay

March 29, 1993

MAR 29 1993 11 08 52

Kathy Brown  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87504-2088

RE: Brine Pit Closure  
Marathon Road Water Station (BW-15)

Dear Kathy:

In response to your letter dated March 5, 1993, owners of Marathon Road Water Station (BW-15) wish to close their brine pit in accordance with OCD guidelines.

As per our conversation, research was done to determine its risk and impact to protectable groundwater. Records and information were gathered from OCD office, State Engineers Office, and from physical inspection of area. Back in 1989 or 1990, the monitor well which was used at this facility was destroyed, enclosed is log and completion of well. The elevated chloride may have been a result of a poorly constructed monitor well, being perforated from 4' to TD, surface runoff may have attributed to as much contaminant as the brine pit. Also enclosed are analysis of water wells from the 1986 and 1992 years, provided by State Engineer. No groundwater is found in this area, according to Johnny Hernandez of the State Engineers Office. Neither the quality nor quantity of groundwater in this area make it feasible to produce. Also enclosed is a groundwater map and geologic map of the area showing little or no usable groundwater within several miles of the site.

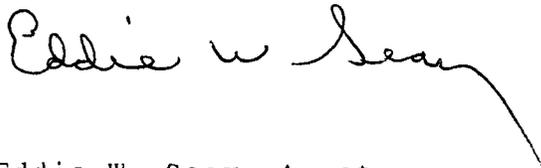
Marathon water station gets its fresh water from a line which was laid by C.W. Trainer, from approximately 10 miles to the east at Arkansas Junction to the Marathon Station. This line has been a crucial benefit to the ranchers in this area. Several ranchers have tapped this line for use as livestock watering. Without this water, several thousand acres would be unusable for ranching.

We do understand the groundwater must be protected, and that by closing this brine pit may allow groundwater to clean itself up by reducing any leaching that may be occurring at this facility.

Please find enclosed recent photos of brine pond. As you can see, closure is urgent. Your timely response to this matter would be appreciated.

If I can supply you with further information or answer any question, please call.

Sincerely,

A handwritten signature in cursive script that reads "Eddie W. Seay". The signature is written in black ink and has a long, sweeping underline that extends to the right.

Eddie W. Seay, Agent  
601 W. Illinois  
Hobbs, NM 88240  
(505)392-2236

enclosures 6

STATE ENGINEER OFFICE  
WELL RECORD

Section 1. GENERAL INFORMATION Marathon Water Station

(A) Owner of well C.W. Trainer Observation Well  
Street or Post Office Address 526 Sandy Mtn. Dr. Owner's Well No. \_\_\_\_\_  
City and State Sunrise Beach, Texas 78643

Well was drilled under Permit No. CP-683 and is located in the:

- a.  $\frac{1}{4}$  SW  $\frac{1}{4}$  SW  $\frac{1}{4}$  SE  $\frac{1}{4}$  of Section 25 Township 19S Range 34E N.M.P.M.  
b. Tract No. \_\_\_\_\_ of Map No. \_\_\_\_\_ of the \_\_\_\_\_  
c. Lot No. \_\_\_\_\_ of Block No. \_\_\_\_\_ of the \_\_\_\_\_  
Subdivision, recorded in Lea County.  
d. X= \_\_\_\_\_ feet, Y= \_\_\_\_\_ feet, N.M. Coordinate System \_\_\_\_\_ Zone in the \_\_\_\_\_ Grant.

(B) Drilling Contractor Abbott Bros. Drilling License No. WD-46

Address P.O. Box 637, Hobbs, New Mexico 88240

Drilling Began 7/18/85 Completed 7/20/85 Type tools Cable Size of hole 8½ in.

Elevation of land surface or \_\_\_\_\_ at well is \_\_\_\_\_ ft. Total depth of well 120 ft.

Completed well is  shallow  artesian. Depth to water upon completion of well 28 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
28	31	3	Sand	1/2 gal.

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
4	Plastic 3	Glued	0	120	120	None	4	120

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				
					Cement at top.

Section 5. PLUGGING RECORD

Plugging Contractor \_\_\_\_\_  
Address \_\_\_\_\_  
Plugging Method \_\_\_\_\_  
Date Well Plugged \_\_\_\_\_  
Plugging approved by: \_\_\_\_\_  
State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received August 16, 1985

Quad \_\_\_\_\_ FWL \_\_\_\_\_ FSL \_\_\_\_\_

File No. CP-683 Use OBS Location No. 19.34.25.43323

19.34.25.43323



00641	TH	00004	SLASH T RANCH	0 TRS 82/02/13 CEC	EXP 195.31E.36.14114	0.00	BLR260	51	0	0	0	X	0186	P		0
00640	TH	00001	BILL-TOM/SLASH X	0 TRS 82/02/10 CEC	EXP 195.32E.19.224431	0.00	BLR250	45	0	0	0	X	0186	P		0
00639	TH	00002	BILL-TOM/SLASH X	0 TRS 82/02/12 CEC	EXP 195.32E.20.134423	0.00	BLR350	75	0	0	0	X	0186	P		0
00071			BILL-TOM/SLASH X	0 TRS 83/02/15 CEC	DND 195.33E.18.133223	3635.00	DP	312	0	0	0	X	1084	P	25-12193	0
			BURGER F A	101 DAL 65/11/17 SED	STK 195.33E.26.422221	3608.00	YT	298	2560	0	57	*	0279		25-12195	0
			BURGER F A	101 DAL 72/09/25 OSB	DND 195.33E.26.422221	3608.00	DP	280	2490	0	0	X	0279	U	25-12195	0
			BURGER F A	101 DAL 76/08/20 SED	STK 195.33E.26.422221	3608.00	DP	289	2807	0	66		0279		25-12195	0
			BURGER F A	101 DAL 76/10/08 SED	STK 195.33E.26.422221	3608.00	YT	306	2610	0	66		0279		25-12195	0
			SCHAURBAUER CATTLE CO	0 TOS 79/10/23 SED	STK 195.34E.03.41213	3968.00	DP	26	504	0	67		1084		25-12201	0
			SCHAURBAUER CATTLE CO	0 TOS 84/07/18 SED	STK 195.34E.03.41213	3968.00	DP	26	499	0	0		1084		25-12201	0
			SCHAURBAUER CATTLE CO	33 DAL 58/12/09 SED	STK 195.34E.09.24231	3890.00	DP	560	4660	0	0	X		U	25-12202	0
			SCHAURBAUER CATTLE CO	33 DAL 79/10/16 SED	STK 195.34E.09.24231	3980.00	DP	238	2314	0	65		0683		25-12202	0
			WILDANKS ENHETT	0 TOS 79/10/23 SED	STK 195.34E.12.24432	3928.00	DP	52	639	0	67				25-12203	0
			WILDANKS ENHETT	0 TOS 84/07/18 SED	STK 195.34E.12.24432	3928.00	DP	41	603	0	0		1084		25-12203	0
			WILDANKS ENHETT	0 TOS 90/06/13 SED	STK 195.34E.12.24432	3928.00	DP	72	584	0	66		1190		25-12203	0
			COOPER JIM	0 DAL 65/11/17 SED	STK 195.34E.31.133220	3632.00	DP	289	2990	0	66		0279		25-12199	0
			COOPER JIM	0 DAL 65/11/17 SED	STK 195.34E.31.232112	3632.00	DP	289	2990	0	66		0279		25-13012	0
			COOPER JIM	0 DAL 72/09/25 USB	STK 195.34E.31.232112	3632.00	DP	290	2960	0	0	X	0279	U	25-13012	0
			COOPER JIM	0 DAL 76/08/20 SED	STK 195.34E.31.232112	3632.00	DP	298	2989	0	67				25-13012	0
			COOPER JIM	0 DAL 76/10/08 SED	STK 195.34E.31.232112	3632.00	DP	297	2985	0	67				25-13012	0
			SNYDER RANCH	0 TOS 79/10/23 SED	STK 195.35E.02.31343	3804.00	DP	58	673	0	66				25-12206	0
			SNYDER RANCH	0 TOS 84/09/26 SED	STK 195.35E.02.31343	3604.00	DP	124	1137	0	63		1084		25-12206	0
			SNYDER RANCH	0 TOS 90/06/07 SED	STK 195.35E.02.31343	3804.00	DP	130	691	0	64		1190		25-12206	0
			SMITH F A	128 TOS 79/12/05 SED	STK 195.35E.04.431442	3891.00	DP	24	478	0	65				25-13267	0
			SMITH F A	128 TOS 84/09/28 SED	STK 195.35E.04.431442	3891.00	DP	26	456	0	61		1284		25-13267	0
			SMITH F A	128 TOS 84/11/09 SED	STK 195.35E.04.431442	3891.00	DP	62	446	0	66		1284		25-13267	0
			SMITH F A	128 TOS 90/06/07 SED	STK 195.35E.04.431442	3891.00	DP	69	487	0	65		1190		25-13267	0
			DALRYMP GENE EST	0 TOS 79/10/24 SED	STK 195.35E.03.11424	3888.00	DP	12	394	0	65				25-13267	0

State Engineers  
groundwater 1992  
analysis for  
this area.

• None listed for our  
area.

II

READ

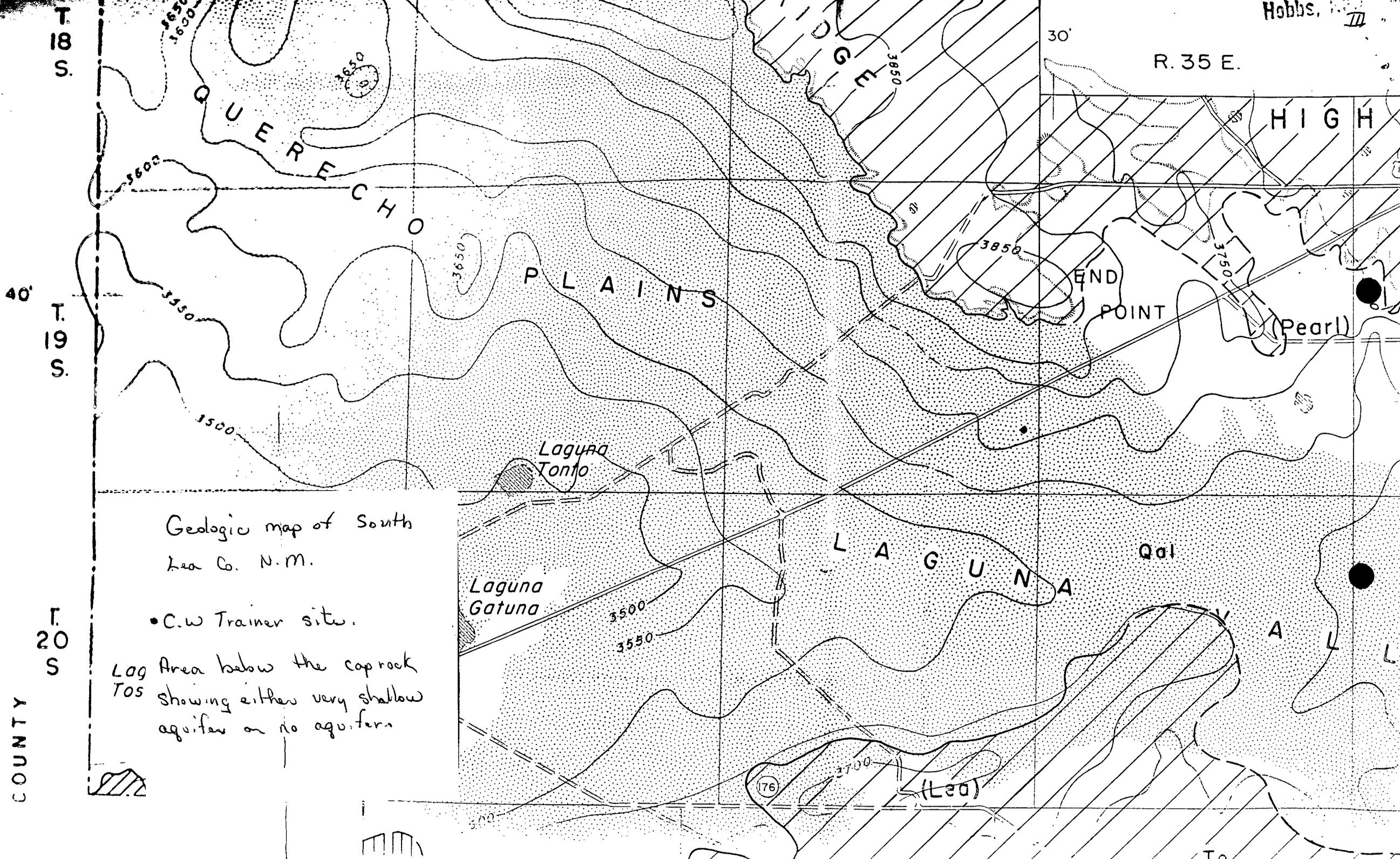
1914

UNCP Business Form - 19

STATE ENGINEER CHEMICAL QUALITY OF WATER LISTING BY LOCATION

LOCATION	DATE COLLECTED	CHLORIDE mg/L	CONDUCT M-MHOS	TEMP DEG	WBF TRS	BASIN FILE	REFERENCE FILE	USE	PT CLTN	CLTR	ADD DATA	CARD DATE	SQU RCE
19S 33E 18 133223	2/15/83	312				CP 00071		DWD	DP	CEC	X	1084	P
19S 33E 26 42221	08/11/76	286			GAL	CP		DOM	DP	OCC	X	0279	
19S 33E 26 42221	1/16/78	326			GAL	CP		STK	DP	CEC	X	1084	P
19S 33E 26 422221	11/17/65	298	2560	57F	GAL	CP		STK	YT	SEO	*		
19S 33E 26 422221	09/25/72	280	2490		GAL	CP		DOM	DP	USG	X	0279	U
19S 33E 26 422221	08/20/76	289	2807	66F	GAL	CP		STK	DP	SEO			
19S 33E 26 422221	10/08/76	306	2610	66F	GAL	CP		STK	YT	SEO			
19S 34E 03 41213	10/23/79	20	504	67F	TGG	L		STK	DP	SEO			
19S 34E 03 41213	7/18/84	26	499		TGG	L		STK	DP	SEO		1084	
19S 34E 09 24231	12/09/58	560	4660		GAL	CP		STK	DP	SEO	X		U
19S 34E 09 24231	10/16/79	238	2314	65F	GAL	CP		STK	DP	SEO		0683	
19S 34E 12 24432	10/23/79	52	639	67F	TGG	L		STK	DP	SEO			
19S 34E 12 24432	7/18/84	41	603		TGG	L		STK	DP	SEO		1084	
19S 34E 31 13220	11/17/65	717	4220	65F	GAL	CP		STK	DP	SEO			
19S 34E 31 232112	11/17/65	289	2990	66F	GAL	CP		STK	DP	SEO			
19S 34E 31 232112	09/25/72		2960		GAL	CP		STK	DP	USG	X	0279	U
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19S 34E 31 232112	10/08/76	297	2985	67F	GAL	CP		STK	DP	SEO			
19S 35E 02 31343	10/23/79	58	673	66F	TGG	L		STK	DP	SEO			
19S 35E 02 31343	9/26/84	124	1137	63F	TGG	L		STK	DP	SEO		1084	
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19S 35E 04 431442	11/09/84	62	446	66F	TGG	L	05339	STK	DP	SEO		1284	
19S 35E 04 431442	9/26/84	26	456	61F	TGG	L		STK	DP	SEO		1284	
19S 35E 05 11424	10/24/79	12	394	65F	TGG	L		STK	DP	SEO			
19S 35E 05 11424	12/06/79	18	405	65F	TGG	L		STK	DP	SEO			
19S 35E 05 11424	2/07/85	8	599		TGG	L		STK	TS52	SEO		0385	
9S 35E 05 121224	08/31/65	20	495		TGG	L	00493	IRR	DP	SEO			
9S 35E 05 121224	08/18/71	90	932	66F	TGG	L	00493	IRR	DP	SEO			

Groundwater  
1986



Geologic map of South  
Lea Co. N.M.

• C.W. Trainer sites.

Log Area below the caprock  
Tos showing either very shallow  
aquifer or no aquifers

COUNTY

T. 18 S.

T. 19 S.

T. 20 S.

R. 35 E.

Hobbs, III

HIGH

END  
POINT

(Pearl)

Laguna  
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LAGUNA Qal

A L L

(76) (Lea)

To



Recent photos of  
pit and deteriorated liner.

The need to close this  
pit is of great importance.





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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

March 5 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-677-241-947**

Mr. Eddie W. Seay, CEI  
601 W. Illinois  
Hobbs, New Mexico 85240

**RE: Closure of Brine Storage Pond  
Marathon Road Water Station (BW-15)  
Lea County, New Mexico**

Dear Mr. Seay:

The New Mexico Oil Conservation Division (OCD) has received your February 8, 1993 proposal on behalf of C.W. Trainer for closure of the single-lined brine storage pond at the Marathon Road Water Station located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. The proposal is to remove all liquids and solids from the pond and to test the soil beneath the liner to insure no contaminants are left to leach vertically down into the groundwater.

The attached chemical analyses of samples from the monitor well which was located on the north side of the brine storage pond indicate that the groundwater is contaminated based on the elevated levels of chlorides and total dissolved solids (TDS). The discharge plan BW-15 for Marathon Road Water Station, renewed by the Director on April 8, 1992, requires that the brine storage pond be either repaired, replaced or closed by April 10, 1993. The OCD acknowledges closure of the brine storage pond in accordance with approval condition number 4.

To approve the closure plan submitted in your February 8, 1993 correspondence, the OCD requires submittal of a risk analysis on the impact to protectable groundwater if the brine contaminated soils and groundwater are left in place. The OCD is charged with protection of

Mr. Eddy Seay  
March 5, 1993  
Page 2

all groundwater with a TDS less than 10,000 mg/l unless it can be demonstrated that the water has no present or reasonable foreseeable beneficial use that would be impaired by contamination (attachement).

The OCD commends Marathon Road Water Station in its initiative to close the single-lined brine storage pond. If you have any questions please feel free to contact me at (505) 827-5885.

Sincerely,

A handwritten signature in cursive script that reads "Kathy M. Brown". The signature is written in black ink and is positioned above the typed name.

Kathy M. Brown  
Geologist

Attachments

xc: Jerry Sexton, OCD Hobbs Office

MARATHON ROAD WATER STATION  
MONITOR WELL SAMPLING RESULTS

<u>DATE</u>	<u>CHLORIDES</u> <u>(mg/l)</u>	<u>TOTAL DISSOLVED</u> <u>SOLIDS (mg/l)</u>
08-19-85	900	6303
10-01-85 *	2113	7898
11-07-85	1400	9310
01-14-86	10,000	21,163
02-25-86 *	3555	9743
04-11-86	5100	11,778
07-03-86	11,000	N/A
04-23-87	6050	N/A
01-18-88	4500	9954
04-07-88	21,000	29,000
07-07-88	27,000	43,500
10-08-88	33,500	63,780
01-17-89 *	38,575	69,440
01-18-89	20,350	34,800
04-24-89	13,850	24,900
07-31-89	12,400	19,430
12-01-89 *	22,000	22,500

\* Samples taken and analyzed by either the EID or OCD.  
All remaining samples taken by C.W. Trainer and analyzed  
by Unichem International or Halliburton laboratories.



STATE OF NEW MEXICO

STATE ENGINEER OFFICE

SANTA FE

S. E. REYNOLDS  
STATE ENGINEER

BATAAN MEMORIAL BUILDING  
STATE CAPITOL  
SANTA FE, NEW MEXICO 87503

July 10, 1985

Mr. Dick Stamets  
New Mexico Oil Conservation  
Division  
Box 2088  
Santa Fe, New Mexico 87501

Dear Mr. Stamets:

Pursuant to our conversation of July 9, 1985, I am revising my letter of May 15, 1985 to read as follows:

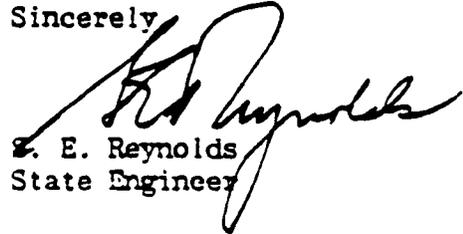
All underground waters in the State of New Mexico containing 10,000 milligrams/liter or less of dissolved solids are hereby designated by the State Engineer pursuant to Section 70-2-12-B.(15) NMSA, 1978; except that this designation shall not include any water for which there is no present or reasonably foreseeable beneficial use that would be impaired by contamination. This designation supersedes all previous designations pertaining to underground water.

The water in lakes and playas should not be contaminated even though they contain more than 10,000 milligrams/liter of total dissolved solids unless it can be shown that contamination of the lake or playa will not adversely affect ground water hydrologically connected to the lake or playa.

The surface waters of all streams within the State of New Mexico regardless of the quality of the water within any given reach are designated for protection.

The memorandum dated April 10, 1967, and the map mentioned therein which shows the areas and formations in which water of 10,000 parts per million or less commonly occur were furnished you in my May 15, 1985 letter.

Sincerely

  
S. E. Reynolds  
State Engineer

SER\*pat

'93 FEB 10 AM 8 58

February 8, 1993

New Mexico Oil Conservation Division  
Box 2088  
Santa Fe, NM 87509

SUBJECT: Pit Closure at Brine Facility  
C.W. Trainer  
Marathon Road Water Station

Kathy Brown:

Bill Olson asked me to direct this to your attention since you were in charge of brine facilities.

The pit in question is a lined brine pit, located 25 miles west of Hobbs, the owner/operator is C.W. Trainer.

The pit liner has deteriorated to the point that a new liner may be required. Mr. Trainer wishes to abandon pit instead of repairing. Listed is the procedure we would like to use to abandon pit:

1. Remove all liquid and solids from pit and dispose in OCD approved facility.
2. Either remove liner and dispose of it or fold liner in and bury on location.
3. Test soil beneath liner to insure no contaminants are left to leach.
4. Remove all contaminated soils and dispose of in OCD approved facility.
5. Bury or cover pit area, mound dirt to prevent water from standing or pooling in this area.

There are no hydrocarbons on the facility so BTEX and TPH tests should not be necessary.

Your suggestions or recommendations on this matter will be greatly appreciated. Looking forward to your response.

Sincerely,



Eddie W. Seay, CEI  
Agent  
601 W. Illinois  
Hobbs, NM 88240  
(505)392-2236

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/21/92,  
or cash received on 4/30/92 in the amount of \$ 690.00  
from C.W. Trainer  
for Marathon Road Water Station BW-15

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (DP No.)

Submitted to ASD by: Kathy Brown Date: 4/30/92

Received in ASD by: Shirley C. Montoye Date: 4/30/92

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal X

Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 80

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment \_\_\_\_\_

**MARATHON ROAD WATER STATION**  
P. O. BOX 369  
KINGSLAND, TX 78639

4-21 1992 88-7227/3149

PAY TO THE ORDER OF OCD \$ 690<sup>00</sup>  
690<sup>00</sup> DOLLARS

MEMO Disc King Ranch W. Trainer

**TEXAS ★ TRUST**  
Savings Bank, FSB  
Kingsland Branch  
P.O. Box 445  
Kingsland, TX 78639  
(361) 358-4513

DELUDE DUPLICATE DRK SAFETY PAPER

C W Trainer

8090 E. Kalil Dr. Scottsdale, Az. 85260 · 602-443-4641 · FAX 1-800-486-4642 FAX 602-443-4642

April 21, 1992

OCD - Bill LeMay  
Box 2088  
Santa Fe, NM 87504

Dear Bill:

Thank you for approving Marathon Road Water Station. My check for  
~~\$640~~ fee is attached.  
\$690

I do not believe my brine pit leaks at all. If it had no liner it would not leak because the elemental salt from the brine has now sealed the underlying sand. Green Meadows Lake north of Hobbs was sealed intentionally with salt from a Carlsbad mine in 1967. Ranchers used to seal their dirt stock tanks with salt. Supersaturated brine has ruined producing oil and gas well when used for kill fluid. Rock salt is used for blocking material in acid jobs. I sure wish OCD would consider these facts.

Our monitor well is history. Some truck driver ran over it and destroyed it.

Thanks again. I hope we have no more problems. I intend to protect the environment and abide by your rules the best I can.

Sincerely,



C W Trainer

OIL CONSERVATION DIVISION  
RECEIVED

'92 APR 28 AM 8 10

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

POST OFFICE BOX 208B  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

April 8, 1992

CERTIFIED MAIL  
RETURN RECEIPT NO. P-670-683-580

Mr. C.W. Trainer  
8090 East Kalil Dr.  
Scottsdale, Arizona 85260

**RE: Approval of Discharge Plan BW-15  
Marathon Road Water Station  
Lea County, New Mexico**

Dear Mr. Trainer:

The discharge plan renewal BW-15 for the Marathon Road Water Station located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The renewal application consists of the original discharge plan as approved May 16, 1985, the renewal application dated September 1, 1991, the materials dated February 26, 1992, submitted as supplements to the application, and the verbal conversation between myself and Mr. C.W. Trainer on April 6, 1992.

The discharge plan renewal was submitted pursuant to Section 5-101.B.3 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Sections 5-101.A and 3-109.C. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications 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 water, ground water, or the environment which may be actionable under other laws and/or regulations.

The monitoring and reporting shall be as specified in the enclosed attachment. Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. C.W. Trainer  
April 8, 1992  
Page 2

Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire April 8, 1997, and you should submit an application for renewal in ample time before this date. Note that under Section 5-101.G of the regulations, if a discharger submits a discharge plan renewal application at least 180 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

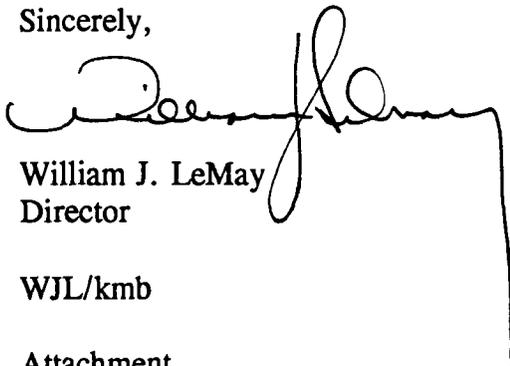
The discharge plan renewal application for the Marathon Road Water Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six-hundred and ninety (690) dollars for brine extraction facilities.

The OCD has received your \$50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval. The flat fee (total payment or installment) is due upon receipt of this letter.

Please make all checks out to the **NMED - Water Quality Management** and send to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



William J. LeMay  
Director

WJL/kmb

Attachment

cc: Chris Eustice - OCD Hobbs Office

**ATTACHMENT TO DISCHARGE PLAN BW-15 APPROVAL  
MARATHON ROAD WATER STATION  
MONITORING AND REPORTING REQUIREMENTS  
(April 8, 1992)**

1. Payment of Discharge Plan Fees: The \$690 flat fee (either total payment or installment) will be paid upon receipt of this approval letter.
2. Mechanical Integrity Testing: An annual mechanical integrity test (MIT) will be conducted on the brine well and the results submitted to the OCD Santa Fe Office. An MIT isolating the casing from the formation will be conducted within 1-1/2 years from receipt of this approval letter.
3. Injection/Production Volumes: A quarterly report listing, by month, of the volume of fluids injected and produced will be submitted to the OCD Santa Fe Office at the end of each quarter.
4. Brine Storage Pond: The brine storage pond may be utilized for one year from receipt of this letter. At that time the brine storage pond will be either repaired, replaced, or closed. If the pond is replaced it will be double-lined with leak detection as proposed in your September 1, 1991 discharge plan renewal application.
5. Monitor Well Analysis: Because it has already been established from past analyses that the water in your monitor well is contaminated (ie. leaking pond), the OCD will not require a current analysis of the monitor well. However, upon either closure, replacement, or repair of the brine storage pond, you are required to monitor the water level in the well on a quarterly basis.
6. Containment of Spills: Adequate containment will be maintained around the loading valves of all tanks. The containment will be inspected and maintained to prohibit leaks, spills and overflows. Berms will be maintained around all tanks (other than freshwater) to contain one-third greater than the volume of the largest tank or all interconnected tanks.
7. Sumps: All new sumps will be either be installed with secondary containment and leak detection or designed so that they may be either cleaned-out and visually inspected on an annual basis or positively pressure tested. The engineering plans for all new sumps must be approved by the OCD prior to construction.



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Personal	Time 4:00 P.M.	Date April 6, 1992
---	--	-------------------	-----------------------

<u>Originating Party</u>	<u>Other Parties</u>
--------------------------	----------------------

K.M. Brown - OCD	Bill LeMay - OCD Director
Roger Anderson - OCD	C.W. Trainer - Marathon Road

subject  
C.W. Trainer's letter stating he was shutting down his brine operations because the discharge plan was too much of a hassle & too costly to comply with.

Discussion  
Explained the background of Marathon Road to Bill.  
Bill called C.W. Trainer and explained that the OCD is not trying to shut him down - we don't want him to shut down. Bill told him to just fix his pond if it's leaking. C.W. still doesn't feel that it is & if it is there's no water to harm. Sampled well in '89 (Anderson, Boyer) & purged 2 well bores & had high TDS showing it is leaking. Bill told C.W. we'd give him the time that he needs to renew his discharge plan. Also, we'd give him the time he needs to fix his pond & put a sump in.

Conclusions or Agreements  
Will approve the DP based on verbal commitments made during phone conversation between Bill & C.W. (4-6-92). Bill wants the DP approved

Distribution

Signed  
Kathy M. Brown

C W Trainer

8090 E. Kalil Dr. Scottsdale, Az. 85260 · 602-443-4641 · FAX 1-800-486-4642 FAX 602-443-4642

Certified Mail '92 APR 1 AM 8 45

March 29, 1992

Oil Conservation Division - Kathy Brown - Geologist

Box 2088

Santa Fe, NM 87504

Re: Discharge Plan BW-15 - Marathon Road Water Station

Dear Kathy:

Thank you for your letter of March 24, 1992 suggesting you will fine us \$10,000 per day or require us to cease all discharges.

We must voluntarily cease all discharges.

Can we shut in our newly tested brine well? Sell the brine on hand from the pit and tank, then bull plug the brine loading valves to cease brine discharge?

We plan to continue to sell fresh water as before if this is acceptable.

We have already expended too much time and money on your discharge plan for now. Maybe later we will reapply.

Sincerely,



C W Trainer

xc: Bill LeMay and Bruce King

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

March 24, 1992



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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-670-683-505**

Mr. C. W. Trainer  
8090 East Kalil Drive  
Scottsdale, Arizona 85260

**RE: Discharge Plan BW-15  
Marathon Road Water Station**

Dear Mr. Trainer:

The Oil Conservation Division (OCD) has received your February 26, 1992 response to the OCD's compliance notification dated January 27, 1992. It was determined after reviewing your submittal, that the OCD still does not have all of the information necessary to approve your discharge plan renewal application. Please submit the following materials required to renew your discharge plan within 30 days of receipt of this letter:

1. Mechanical Integrity Test

The OCD has not received the results from your mechanical integrity test which you stated would be conducted the week of March 2, 1992. Submit the pressure chart to the OCD Santa Fe Office.

2. Brine Storage Pond

The OCD has received your request for approval to continue using your brine storage pond until brine sales increase enough to permit constructing an alternative storage system. The OCD will allow you to continue using your brine storage pond for six months from the time your discharge plan renewal is approved. Commit to ceasing use of your brine storage pond in a maximum of six months from the time your discharge plan renewal is approved.

3. Brine Loading Area

The OCD has reviewed your engineering plans for a spill collection system at the brine loading area. The plans are adequate with the exception of the sump which is currently non-acceptable. Your sump is basically a well, and since it will contain a corrosive fluid the OCD requires that

Mr. C. W. Trainer  
March 24, 1992  
Page 2

it be tested to ensure its integrity on an annual basis. If you already have or still intend to follow through with this sump design then the OCD will require an annual pressure test (MIT) to ensure integrity of the sump (visual inspection is impossible). I have tried repeatedly to contact you and discuss this issue since you stated in your February 26, 1992 correspondence that this system would be constructed and in service by April 1, 1992.

If you have already installed or still plan to construct this type of sump then you must commit to performing an annual pressure test on the sump. If you have not yet constructed the sump and would like to modify the system to incorporate secondary containment and leak detection, then you need to submit the plans for OCD approval prior to construction. Include a schedule for completion of this project.

4. Monitor Well

Because it has already been established from past analyses that the water in your monitor well is contaminated (ie. leaking pond), the OCD does not require a current analysis of the monitor well. However, upon either closure, replacement, or repair of the brine storage pond, you are required to monitor the water in the well on a quarterly basis. Commit to quarterly monitoring of the water in your monitor well upon closure/repair of your brine storage pond.

Because of the lengthy time encountered in trying to permit your facility and the fact that you have been operating for approximately 1 3/4 years with an expired permit, the OCD requires that the information requested above be submitted within 30 of receipt of this letter. If the required materials are not received in the time frame above, the OCD will proceed with action through the Director who may require Marathon Road Water Station to cease all discharges, or assess civil penalties of up to \$10,000 per day.

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

Sincerely,



Kathy M. Brown  
Geologist

xc: Chris Eustice - OCD Hobbs Office

C W Trainer

8090 E. Kalil Dr. Scottsdale, Az. 85260 · 602-443-4641 · FAX 1-800-486-4642 FAX 602-443-4642

OIL CONSERVATION DIVISION  
RECEIVED

MAR 29 1992 8 37 AM

Certified Mail

March 29, 1992

Oil Conservation Division - Kathy Brown - Geologist  
Box 2088  
Santa Fe, NM 87504

Re: Discharge Plan BW-15 - Marathon Road Water Station

Dear Kathy:

Thank you for your letter of March 24, 1992 suggesting you will fine us \$10,000 per day or require us to cease all discharges.

We must voluntarily cease all discharges.

Can we shut in our newly tested brine well? Sell the brine on hand from the pit and tank, then bull plug the brine loading valves to cease brine discharge?

We plan to continue to sell fresh water as before if this is acceptable.

We have already expended too much time and money on your discharge plan for now. Maybe later we will reapply.

Sincerely,



C W Trainer

xc: Bill LeMay and Bruce King

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 2/27/92  
or cash received on 3/6/92 in the amount of \$ 50.00  
from Marathon Road Water Station  
for Marathon Road Water Station BW-15  
Submitted by: Roger C. Anderson (Facility Name) Date: 3/6/92 (DP No.)  
Submitted to ASD by:                      Date:                       
Received in ASD by: Anthony C. Montoya Date: 3/6/92  
Filing Fee  New Facility  Renewal   
Modification  Other  (specify)

Organization Code 521.07 Applicable FY 80

To be deposited in the Water Quality Management Fund.  
Full Payment  or Annual Increment

MARATHON ROAD WATER STATION  
P. O. BOX 369  
KINGSLAND, TX 78639

2-27-92 88-7227/3149

PAY TO THE ORDER OF WMed Water Quality Mgmt \$ 50.00  
50.00 DOLLARS

TEXAS ★ TRUST  
Savings Bank, FSB  
Kingsland Branch  
P.O. Box 445  
Kingsland, TX 78639  
(918) 266-4513

SAFETY PAPER

PRINTED IN U.S.A.

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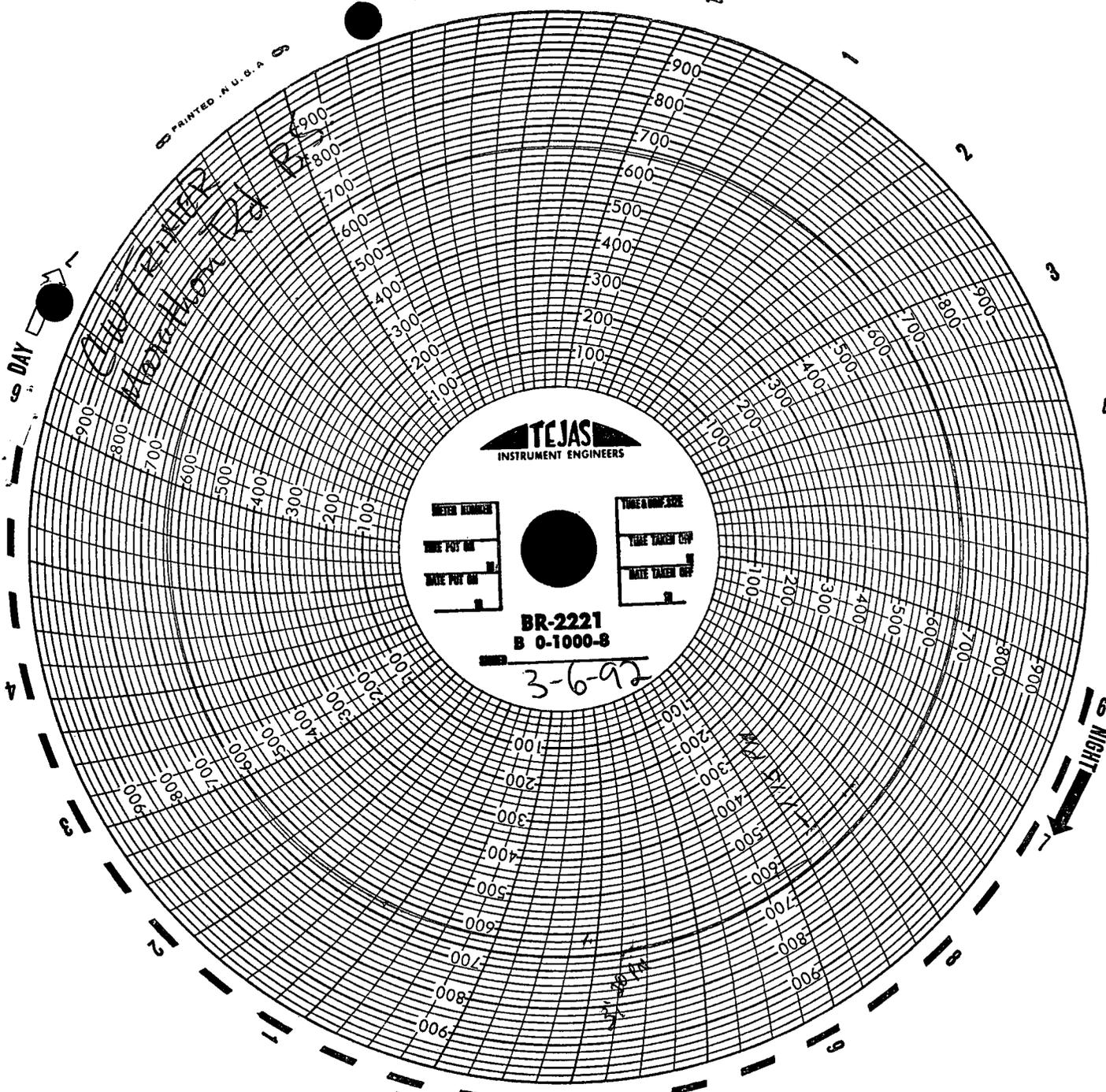
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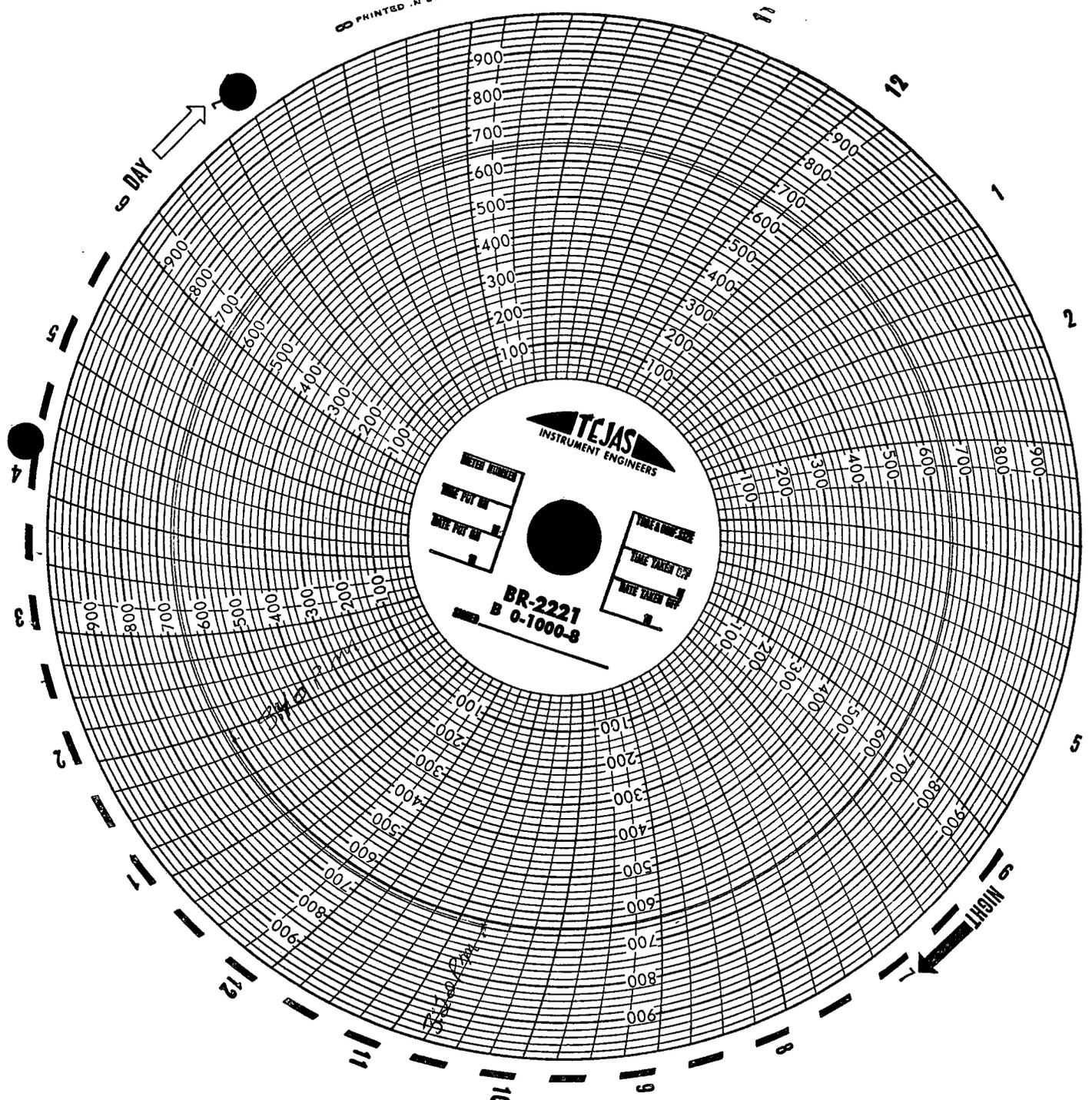
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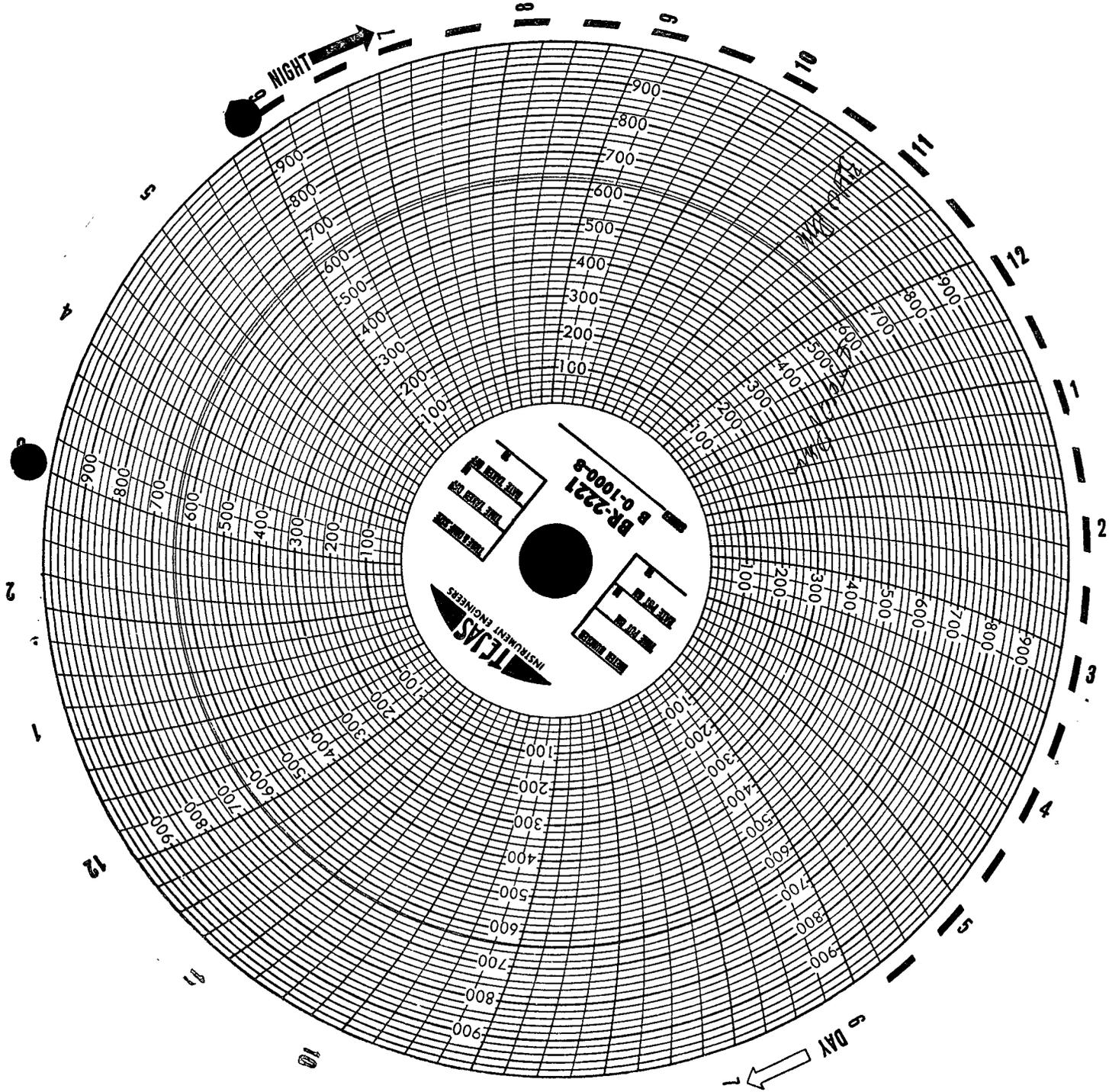
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100





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



BRUCE KING  
GOVERNOR

March 24, 1992

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-670-683-505**

Mr. C. W. Trainer  
8090 East Kalil Drive  
Scottsdale, Arizona 85260

**RE: Discharge Plan BW-15  
Marathon Road Water Station**

Dear Mr. Trainer:

The Oil Conservation Division (OCD) has received your February 26, 1992 response to the OCD's compliance notification dated January 27, 1992. It was determined after reviewing your submittal, that the OCD still does not have all of the information necessary to approve your discharge plan renewal application. Please submit the following materials required to renew your discharge plan within 30 days of receipt of this letter:

1. Mechanical Integrity Test

The OCD has not received the results from your mechanical integrity test which you stated would be conducted the week of March 2, 1992. Submit the pressure chart to the OCD Santa Fe Office.

2. Brine Storage Pond

The OCD has received your request for approval to continue using your brine storage pond until brine sales increase enough to permit constructing an alternative storage system. The OCD will allow you to continue using your brine storage pond for six months from the time your discharge plan renewal is approved. Commit to ceasing use of your brine storage pond in a maximum of six months from the time your discharge plan renewal is approved.

3. Brine Loading Area

The OCD has reviewed your engineering plans for a spill collection system at the brine loading area. The plans are adequate with the exception of the sump which is currently non-acceptable. Your sump is basically a well, and since it will contain a corrosive fluid the OCD requires that

Mr. C. W. Trainer  
March 24, 1992  
Page 2

it be tested to ensure its integrity on an annual basis. If you already have or still intend to follow through with this sump design then the OCD will require an annual pressure test (MIT) to ensure integrity of the sump (visual inspection is impossible). I have tried repeatedly to contact you and discuss this issue since you stated in your February 26, 1992 correspondence that this system would be constructed and in service by April 1, 1992.

If you have already installed or still plan to construct this type of sump then you must commit to performing an annual pressure test on the sump. If you have not yet constructed the sump and would like to modify the system to incorporate secondary containment and leak detection, then you need to submit the plans for OCD approval prior to construction. Include a schedule for completion of this project.

4. Monitor Well

Because it has already been established from past analyses that the water in your monitor well is contaminated (ie. leaking pond), the OCD does not require a current analysis of the monitor well. However, upon either closure, replacement, or repair of the brine storage pond, you are required to monitor the water in the well on a quarterly basis. Commit to quarterly monitoring of the water in your monitor well upon closure/repair of your brine storage pond.

Because of the lengthy time encountered in trying to permit your facility and the fact that you have been operating for approximately 1 3/4 years with an expired permit, the OCD requires that the information requested above be submitted within 30 of receipt of this letter. If the required materials are not received in the time frame above, the OCD will proceed with action through the Director who may require Marathon Road Water Station to cease all discharges, or assess civil penalties of up to \$10,000 per day.

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

Sincerely,



Kathy M. Brown  
Geologist

xc: Chris Eustice - OCD Hobbs Office

3-12-92

Tried to reach Mr. Gene Lee to discuss proposed Sump Diagram. ~~Need~~

Basically the sump is a well.

Would need to test the integrity of the sump on an annual basis since it will be holding highly corrosive fluids (brine). 40' is too deep to do visually, so would need to pressure test it on an annual basis.

Suggestion - why not put in a standard sump with leak detection and double lining. Then wouldn't need annual ~~pressure~~ tests.

OIL CONSERVATION DIVISION  
RECEIVED  
'92 MAR 10 AM 10 19



MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

February 26, 1992

**Kathy Brown**  
Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, N.M. 87504-2088

**RE: Marathon Road Water Station  
Discharge Plan BW-15 Renewal**

Dear Ms. Brown:

This letter is to address the deficiencies in the above renewal application. Upon review of the last 4 months of brine sales, some changes are requested deviating from the renewal application submitted. The total revenue generated from brine sales in 1991 at Marathon Road Water Station were barely sufficient to cover expenses. Since January 1, 1992 Brine sales have drastically reduced, following the downturn in drilling activity in the area. These facts support the following changes and plans for Marathon Road Water Station:

- 1) The Brine Extraction well shall be tested to prove mechanical integrity during the week March 2nd thru March 6th, 1992. Your representative in Hobbs, N.M., Mr. Chris Eustice will be notified of the test and will witness all testing. The chart will be sent to your office upon completion of testing.
- 2) Due to economic reasons a new Brine storage pond cannot be built. The volume of Brine sales has fallen below the volume required to break even on expenses. Our plan is to drill another Brine extraction well on the current site of Marathon Road Water Station. This can be done and pumps sized to make Brine upon demand into the Vertical Brine storage tank above ground. When this is accomplished, The existing brine storage pond will be completely backfilled and no longer used.
- 3) Suspend brine storage in the existing brine pond immediately. All brine will now be stored in the 1250 bbl vertical brine tank that feeds the truck loading manifold. All brine made will go into this above ground storage until a suitable brine extraction well can be built. The brine storage pond will be pumped dry and left unused until it is backfilled.



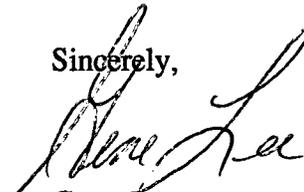
MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

**Kathy Brown**  
**February 26, 1992**  
**Page --2--**

- 4) An acceptable method of collecting brine spillage at the loading valves will be built and in service no later than 4-1-92. See attached Diagram.
- 5) The existing monitor well will be sampled monthly after removing brine from the brine storage pond until it is evident that the TDS coming from the monitor well samples have begun to reach suitable levels. This should occur soon after use of the brine storage pond is back filled and no brine stored outside the above ground tanks, the monitor well will be taken and submitted to your office on the 1st of every month starting April 1, 1992.

Enclosed is a check in the amount of \$50.00 for the filing fee. The remainder \$640.00 will be submitted upon approval of the discharge plan. If you have any questions or suggestions Please call or write. Thank you for your cooperation in this matter.

Sincerely,



Gene Lee

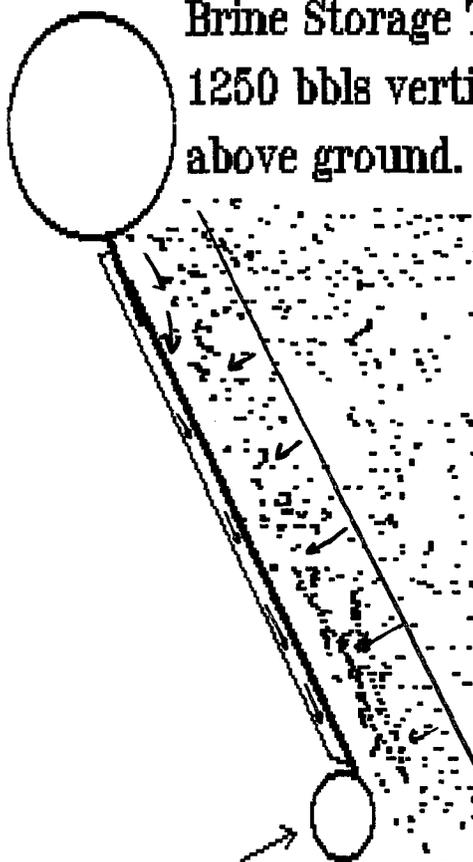
Marathon Road Water Station

Discharge Plan BW-15

Loading Manifold Changes

Mar. 2, 1992

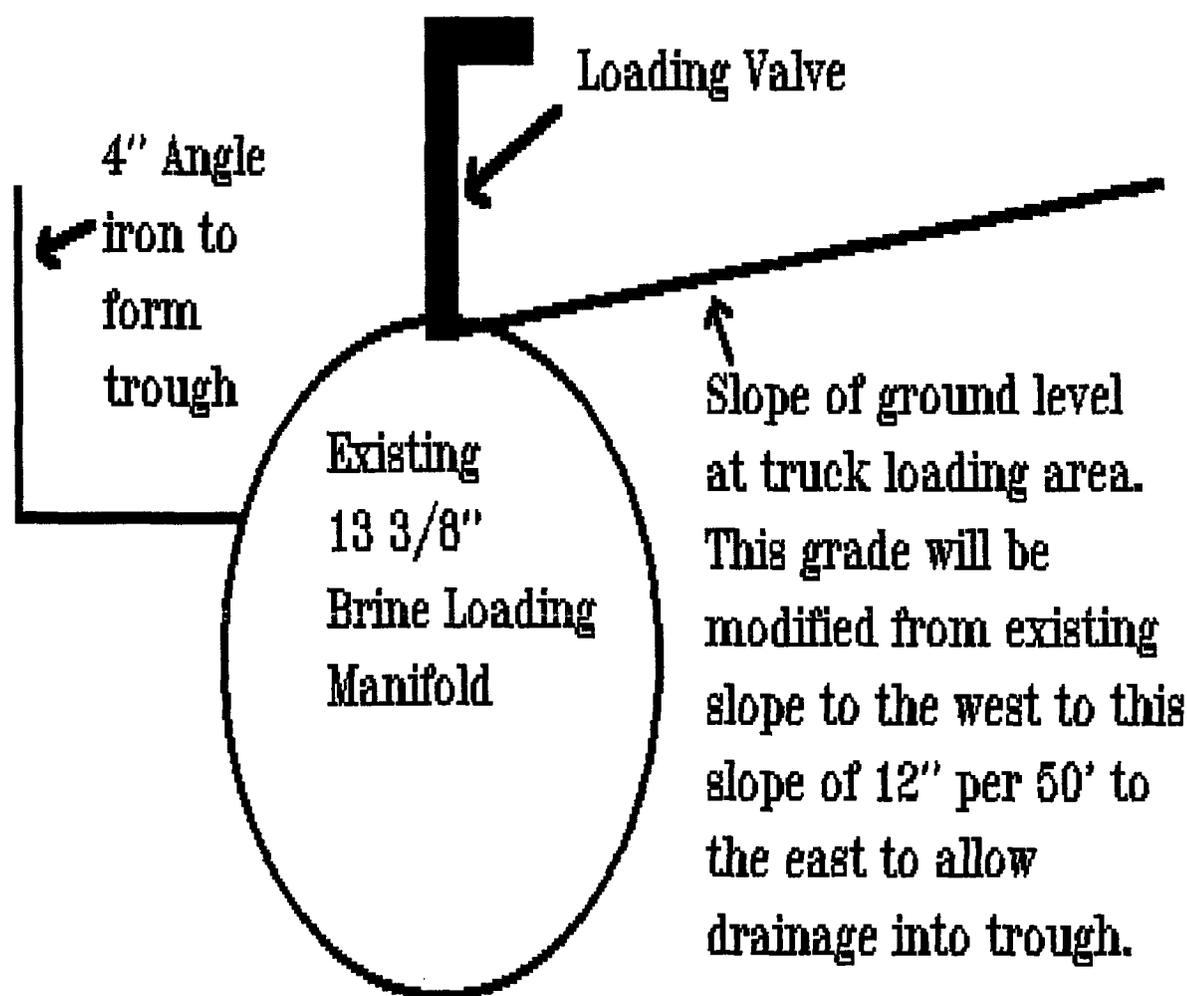
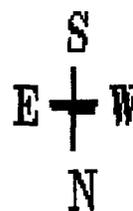
Brine Storage Tank  
1250 bbls vertical tank  
above ground.



Sump Hole Made  
of 20" casing set in cement  
at 40' below surface

*Highway*

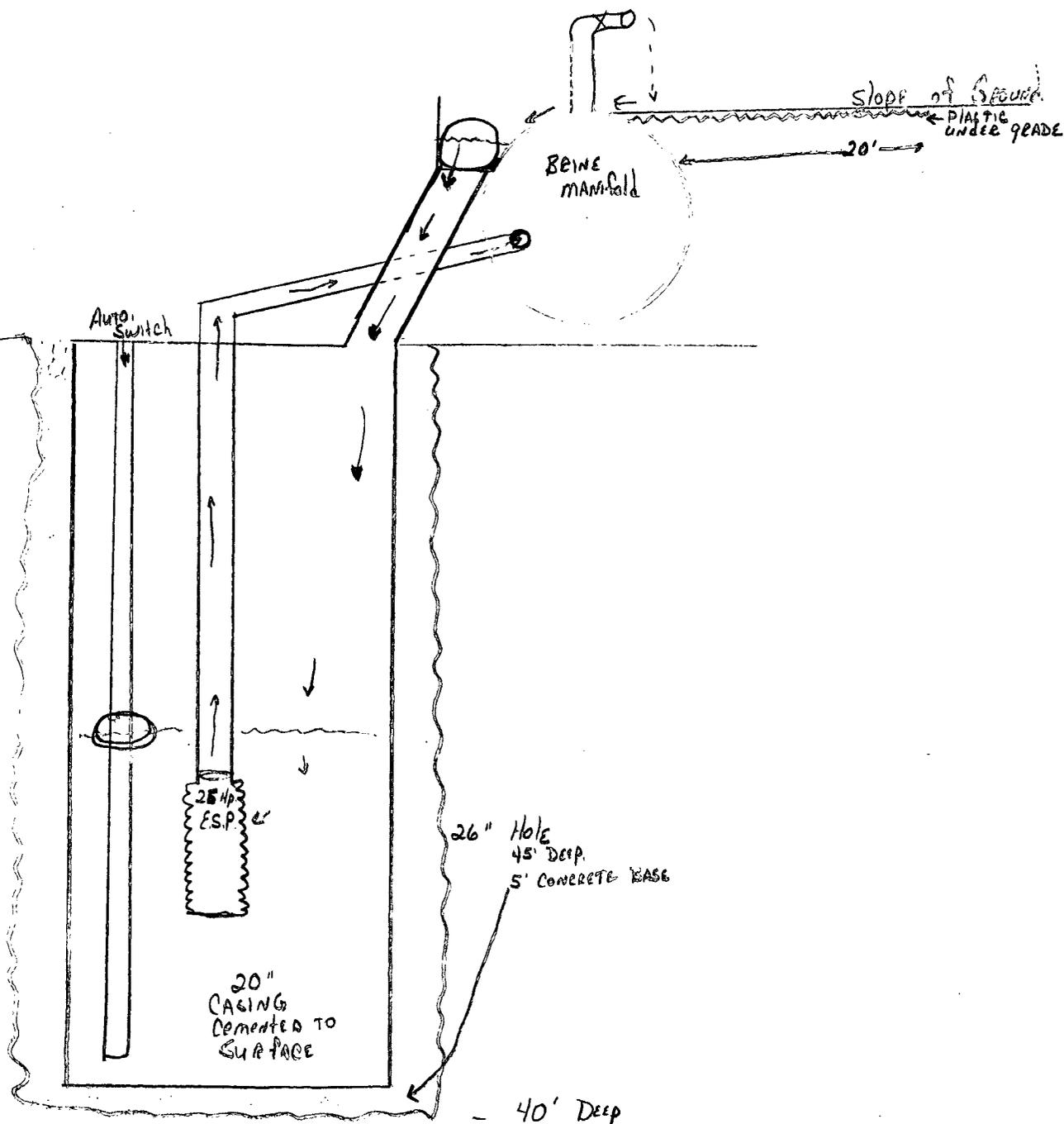
Marathon Road Water Station  
Discharge Plan BW-15  
Loading Manifold Changes  
Mar. 2, 1992



## MARATHON ROAD WATER STATION. Sump Diagram

This diagram shows how any spillage from the loading area will run into the angle iron trough welded onto the side of the existing brine loading manifold. This has a 12" per 200' drop to the end of the manifold. The spillage will follow the trough and run into a 20" casing cemented to surface. This sump will have a 25 hp. electric submersible pump installed in it with an automatic switch that will start the pump when fluid gets above 8' deep inside the sump. This will pump out the fluid from the sump and discharge it directly back into the end of the brine manifold. This pump will pump at a maximum rate of 150 gallons/min continuously. This should be sufficient to even take care of any valves which may be left partially open.

The grade along the manifold and loading valves will be such as to force any spillage directly back across the manifold and into the trough. Under the caliche grade, a plastic liner will be installed 8" below the surface and extend 20' away from the edge of the manifold. This will create an impermeable barrier to prevent any spillage from leaching into the soil beyond the 8" of caliche above the plastic.





MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 9:00 A.M	Date March 9, 1992
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<u>Originating Party</u>	<u>Other Parties</u>
--------------------------	----------------------

<del>K.M. Brown</del> C.W. Trauner Marathon Rd.	K.M. Brown - OCD
--	------------------

Subject Returning Call. RE: Need analyses of monitor well.

Discussion

Told C.W. Trauner we need an analyses on his monitor well. He stated that all of the analyses are bogus because they made him build the well too small to get a pump in to purge the well. I told him he should bail it 3 well bores worth to get a representative sample. He stated that this was a lot of work. I told him we need an analyses before approval of the Discharge Plan. He said OK - he'd get with Gene Lee and set it up.

Also, told him we would allow him to continue to use his brine storage pond for another 6 months Conclusions or Agreements at that time he would need to either close it or double-line it.

DP ready to approve with conditions

Location Signed Kathy Brown

OIL CONSERVATION  
RECEIVED

'92 MAR 13 AM 9 31



MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

February 26, 1992

**Kathy Brown**  
Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, N.M. 87504-2088

**RE: Marathon Road Water Station  
Discharge Plan BW-15 Renewal**

Dear Ms. Brown:

This letter is to address the deficiencies in the above renewal application. Upon review of the last 4 months of brine sales, some changes are requested deviating from the renewal application submitted. The total revenue generated from brine sales in 1991 at Marathon Road Water Station were barely sufficient to cover expenses. Since January 1, 1992 Brine sales have drastically reduced, following the downturn in drilling activity in the area. These facts support the following changes and plans for Marathon Road Water Station:

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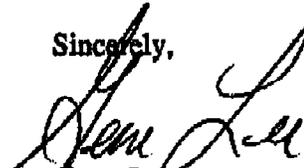
MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

Kathy Brown  
February 26, 1992  
Page --2--

- 4) An acceptable method of collecting brine spillage at the loading valves will be built and in service no later than 4-1-92. See attached Diagram.
- 5) The existing monitor well will be sampled monthly after removing brine from the brine storage pond until it is evident that the TDS coming from the monitor well samples have begun to reach suitable levels. This should occur soon after use of the brine storage pond is back filled and no brine stored outside the above ground tanks, the monitor well will be taken and submitted to your office on the 1st of every month starting April 1, 1992.

Enclosed is a check in the amount of \$50.00 for the filing fee. The remainder \$640.00 will be submitted upon approval of the discharge plan. If you have any questions or suggestions Please call or write. Thank you for your cooperation in this matter.

Sincerely,



Gene Lee

Kathy Brown

2 26 92 Note by C W Trainer

We expect to miss a lot of our brine sales until we have storage again. It would help a great deal if we could keep 2 or 3 feet of brine in this pit to sell from. Our business often comes in bunches and we can not produce fast enough to meet demand.

I respectfully request you consider letting us use the bottom 3 feet of the pit for storage for awhile. It would help us build the new well sooner. If not, we must do as you say.

\$50 filing fee is attached to this copy.



C W Trainer

C.W. TRAINER  
8090 E. KALIL DR.  
SCOTTSDALE, AZ. 85260



MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

February 26, 1992

RECEIVED

FEB 26 1992

OIL CONSERVATION DIV.  
SANTA FE

Kathy Brown  
Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, N.M. 87504-2088

RE: Marathon Road Water Station  
Discharge Plan BW-15 Renewal

Dear Ms. Brown:

This letter is to address the deficiencies in the above renewal application. Upon review of the last 4 months of brine sales, some changes are requested deviating from the renewal application submitted. The total revenue generated from brine sales in 1991 at Marathon Road Water Station were barely sufficient to cover expenses. Since January 1, 1992 Brine sales have drastically reduced, following the downturn in drilling activity in the area. These facts support the following changes and plans for Marathon Road Water Station:

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MARATHON ROAD WATER STATION  
Lea County, New Mexico  
Brine and Fresh Water

**Kathy Brown**  
**February 26, 1992**  
**Page --2--**

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Enclosed is a check in the amount of \$50.00 for the filing fee. The remainder \$640.00 will be submitted upon approval of the discharge plan. If you have any questions or suggestions Please call or write. Thank you for your cooperation in this matter.

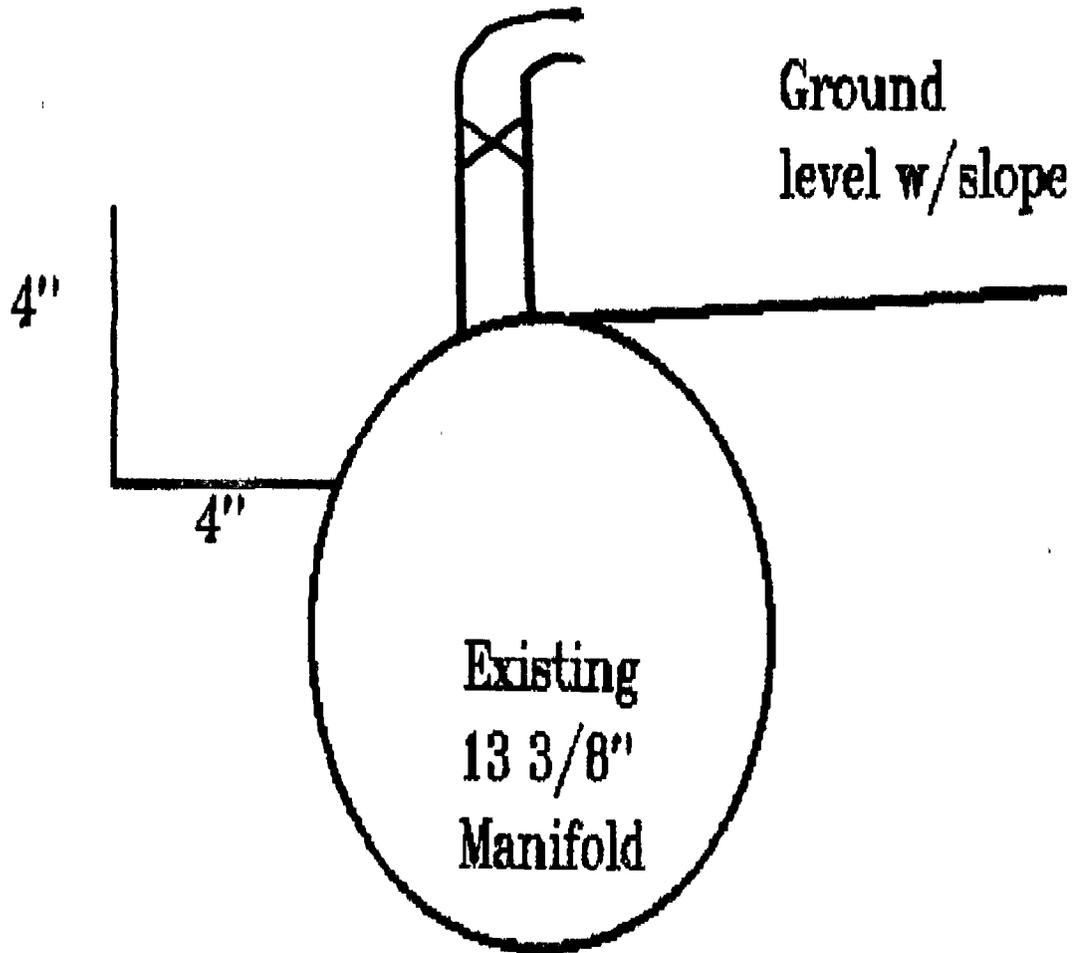
Sincerely,

A handwritten signature in black ink that reads "Gene Lee". The signature is written in a cursive style with a large, sweeping initial 'G'.

Gene Lee

# Marathon Road Water Station

## End Diagram---Looking South From North End



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

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

January 27, 1991

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-756-903-915**

Mr. C. W. Trainer  
8090 East Kalil Drive  
Scottsdale, Arizona 85260

**RE: Compliance Notification  
Marathon Road Water Station**

Dear Mr. Trainer:

The Oil Conservation Division (OCD) requested a discharge plan renewal application for the Marathon Road Water Station on May 30, 1991. Because your discharge plan expired on May 16, 1990, the OCD required Marathon Road to submit the application for renewal of plan approval within sixty days of receipt of the letter of request. The OCD received your discharge plan (BW-15) renewal application on October 16, 1991, which is 135 days after receipt of the OCD's letter of request (received June 3, 1991). The OCD contacted Marathon Road on October 29, 1991, and again on November 13, 1991, to discuss deficiencies in the renewal application, in an attempt to renew the discharge plan and bring Marathon Road into compliance.

New Mexico Water Quality Control Commission (WQCC) Regulation 3-104 requires a discharge plan for any person who "shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into groundwater". Because your facility discharges fluids which "may move directly or indirectly into groundwater," you are required to have an approved discharge plan to operate. At present, your discharge plan has been expired for approximately 1 3/4 years. The OCD requires that you submit the following materials necessary to renew your discharge plan within 30 days of receipt of this letter:

1. Brine Loading Area

In your discharge plan renewal application you committed to construct concrete spill pads beneath the truck loading valves. You proposed that the pads would be curbed and graded to drain into your proposed double-lined pond. Submit a timetable for completing this item. If there are any changes in the construction of the concrete spill pads you must notify the OCD and obtain approval.

2. Brine Storage Pond

Again, I have attached a chronological listing of the chemical analyses for chlorides and total dissolved solids (TDS) in samples obtained from your monitor well located on the north side of your single-lined brine pond. As previously stated, the elevated levels of chlorides and TDS confirms groundwater contamination. In your discharge plan renewal application you proposed to convert your current brine pond into a freshwater storage pond, and construct a new, double-lined brine storage pond with leak-detection.

If you choose to convert the single-lined pond into a freshwater storage pond you must first inspect the liner for leaks, using an OCD approved technical method. If there are any leaks identified the liner must either be repaired or replaced before any fluids are stored in the pond; otherwise, you will be required to close the pond. The reason for not allowing freshwater to be stored in a leaking pond is that 1) the freshwater will leach out salts bound in the soils below the pond, and 2) the freshwater will create a hydraulic head and force the plume of contaminated groundwater beneath the pond to migrate laterally and/or downward.

The OCD has received the engineering plans for your proposed double-lined brine storage pond with leak detection and it is acceptable. You are required to submit a reasonable timetable for completion of the new pond. If there are any changes in the construction of this pond or if you decide to proceed with an alternative method for storing produced brine, then submit a detailed plan and timetable.

3. Groundwater investigation

Marathon Road Water Station is required to determine the extent of the groundwater contamination below the brine storage pond as identified by the chemical analyses of fluids in the monitor well. Submit a groundwater investigation plan and timetable to determine the extent of contamination related to the brine storage pond.

3. Monitor Well

In the original discharge plan, Marathon Road Water Station committed to quarterly analyses of their monitor well for chlorides and total dissolved solids (TDS). The last sample analyzed from your monitor well was conducted by the OCD in December of 1989. Prior to approval of your discharge plan renewal, you are required to sample the monitor well, analyze for chlorides and TDS, and submit the results to the OCD. Continued sampling will be required on a quarterly basis until further notice from the OCD.

4. Mechanical Integrity Testing

As stated in the original discharge plan renewal request, the OCD requires that all brine wells be pressure tested (open-hole) to 500 psi for 4 hours on an annual basis. A pressure test isolating the casing from the formation using either a bridge plug or packer must be conducted at least once every 5 years or during well workovers.

The last pressure test that the OCD has on file for your brine well is dated April 2, 1984, approximately 8 years old. The U.S. Environmental Protection Agency requires by federal law that all Class III (brine) Wells demonstrate mechanical integrity at least once every five years during the life of the well (40 CFR 146.33).

The results from a current pressure test are required prior to approval of the discharge plan renewal application. If the pressure test is performed using the open-hole method then a commitment to conduct a pressure test isolating the casing from the formation within the next 1 1/2 years is required. An OCD representative must be on site to witness all pressure tests. Notify Chris Eustice at the OCD Hobbs District Office (393-6161) at least 7 days prior to performing the test.

5. Discharge Plan Fees

The discharge plan renewal application for the Marathon Road Water Station is subject to the WQCC regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six-hundred and ninety (690) dollars for brine wells. Billable facilities shall pay the filing fee at the time of discharge plan application, renewal or modification, and shall pay the flat fee at the time of discharge plan approval.

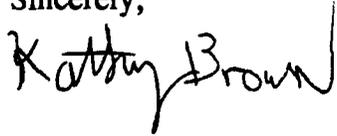
Enclosed is your check for \$690.00 which is the discharge plan flat fee and is not due until the time of approval. However, you must submit the \$50.00 filing fee which was due at the time that you submitted your discharge plan renewal application.

Mr. C. W. Trainer  
January 27, 1992  
Page 4

If the required materials are not received in the time frame above, the OCD will proceed with action through the Director who may require Marathon Road Water Station to cease all discharges, or assess civil penalties of up to \$10,000 per day.

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

Sincerely,



Kathy M. Brown  
Geologist

Enclosures

xc: Chris Eustice - OCD Hobbs Office

MARATHON ROAD WATER STATION

DP EXPIRED MAY 16, 1990 - NEED TO RENEW WITHIN 30 DAYS!

1. Need \$50 filing fee; have \$690 renewal fee. Would like to send back check and get a new one for a total of \$740, with a current date on it.
2. Status of brine pipeline? Stated on Nov. 13, 1991, that he'd know within 30 days if the project would fly.
3. Need commitment and timetable for double-lining the pond. Also, need timetable for concrete areas below loading valves.
4. Need open-hole test before approval. Need commitment for casing isolation test within 1-1/2 years from approval.
5. Reminder of quarterly injection/production volumes starting in first quarter 1992 (March). Also, you stated you'd get total produced brine from BLM - status?

1/23/92

Phoned Trainer - Stated he now wants to drill a 2<sup>nd</sup> well and convert brine pond to freshwater pond.

Doesn't sound like he's very serious about anything. <sup>Brine</sup> DPS will follow-up with a letter

2710 92

**MARATHON ROAD WATER STATION**  
P. O. BOX 369  
KINGSLAND, TX 78639

11-3 91 88-7227/3149

PAY TO THE ORDER OF NMED - Water Quality Management \$ 690<sup>00</sup>

690<sup>00</sup> DOLLARS

MEMO BW-15 - Disch Plan Fee CW Trainer

TEXAS ★ TRUST  
Savings Bank, FSB  
Kingsland Branch  
2002 Avenue  
Kingsland, TX 78639  
(915) 388-4513

10-30-91 - cal mail

SAFETY PAPER

11-13-91

Check for flat fee submitted prior to DP renewal approval.

Will hold check until approval.

Verbal correspondence with C.W. Trainer concerning this on 11/13/91.

K. Brown

1/24/92

Sent check back since DP renewal still not approved.

Requested DP Filing Fee \$50.00



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 9:30	Date 11/13/91
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<u>Originating Party</u>	<u>Other Parties</u>
K. Brown	C.W. Trainer

Subject  
Brine DP Fke  
Status of Brine Facility - <sup>Proposed</sup> Double-lined pond.

Discussion  
Trainer said he'd send the \$50 filing fee next week. Status of pond is on hold until he sees if his new proposed ~~plan~~ brine pipeline can be financed. Wants to build a brine line (6" polyethylene) from facility, west to county line and then south. Rigs would tap into it wherever located. Line would be above ground. Trying to presale some brine to drilling companies to finance the project. Will keep me posted on progress. Should know if project will fly within 30 days. If project goes, will use the money to build the double-lined pond. Will build the pond even if the project doesn't fly.

Conclusions or Agreements

Distribution

Signed Kathy Brown



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

BRUCE KING  
GOVERNOR

October 30, 1991

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-106-675-375**

Mr. C. W. Trainer  
8090 East Kalil Drive  
Scottsdale, Arizona 85260

**RE: Discharge Plan Fee for BW-15  
Marathon Road Water Station**

Dear Mr. Trainer:

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund." Enclosed is a copy of WQCC Rule 3-114 effective as of August 18, 1991.

The Oil Conservation Division (OCD) requested a discharge plan renewal application for the Marathon Road Water Station on May 30, 1991, prior to the effective date of the WQCC Rule 3-114. The OCD received your discharge plan (BW-15) renewal application on October 16, 1991, which is after the effective date of the WQCC discharge plan fee regulation 3-114.

The discharge plan renewal application for the Marathon Road Water Station is subject to the WQCC regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six-hundred and ninety (690) dollars.

The \$50 filing fee is due immediately and is nonrefundable. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval.

Mr. C. W. Trainer  
October 30, 1991  
Page 2

Please make all checks out to the **NMED - Water Quality Management** and send to the **OCD Santa Fe Office**. If you have any questions, please do not hesitate to contact me at (505) 827-5824.

Sincerely,

A handwritten signature in cursive script that reads "Kathy M. Brown". The signature is written in black ink and is positioned above the typed name.

Kathy M. Brown  
Geologist

Enclosure

xc: OCD Hobbs Office



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time	Date
			10-29-91

<u>Originating Party</u>	<u>Other Parties</u>
K. Brown - OCD	Gene Lee - Consultant 622-7355

Subject Marathon Road Water Station  
DP Renewal Application - Comments

Discussion Pond - new double lined pond for brine storage

1. Need dimensions - Will send diagram
2. Need slopes + leak detection diagram - will send diagram <sup>201</sup>
3. Need to anchor liner + containment liner up above position shown on his diagram. Said "OK, No problem"
4. Need to have vent - Said OK; is standard with company installing ponds liners.
5. Need time table for building pond - will send.

Other Comments

Conclusions or Agreements

1. Told him only need to send volume reports quarterly, with monthly listings
2. Told need to send verification of checking leak detection @ least 1/30 days. Said will check daily but send a monthly report with the volume reports <sup>Signed</sup> quarterly.

Distribution →

STATE OF NEW MEXICO

County of Bernalillo

SS

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 9 day of Dec., 1991, and the subsequent consecutive publications on Dec., 1991.

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 9 day of Dec., 1991.

PRICE \$ 50.82

Statement to come at end of month.

ACCOUNT NUMBER C 81184

NOTARIAL SEAL

EMADETTA ORTIZ

PUBLIC-NEW MEXICO SECRETARY OF STATE

12-18-93

CLA-22-A (R-12/91)

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-6800:

(GW-68) Williams Field Services

Company, Sandy Fishler, Environmental Specialist, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Simms Mesa Compressor Station located in the NW/4 NE/4, Section 22, Township 30 North Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 75 gallons per day of waste water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration estimated to range from 600 to 900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-1) Bloomfield Refining Company

David Rodrick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a renewal application for the previously approved discharge plan for its Bloomfield Refinery located in the NW/4 SE/4 and the S/2 NE/4 and the N/2 NE/4 SE/4 of section 27, and the S/2 NW/4 and the N/2 NW/4 SW/4 and the SE/4 NW/4 SW/4 and the NE/4 SW/4 of section 28 Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The renewal application consists of an evaluation proposal of the refinery waste water system with the objective of eliminating all unlined storage facilities. Groundwater most likely to be affected by any accidental spills is at a depth ranging from 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l. The previously approved discharge plan addresses how spills, leaks, and other accidental discharges to surface will be managed.

(GW-74) Halliburton Company

Matt D. Ratliff, Environmental Engineer, P.O. Drawer 1431, Duncan, Oklahoma 73536-0100, has submitted a discharge plan application for its Hobbs Service Facility located in Section 7, Township 18 South, Range 39 East, NMPM, Lea County, New Mexico. Approximately 136 gallons per day of waste water is stored in below grade fiberglass tanks prior to disposal in an OCD approved offsite disposal facility. Groundwater most likely to be affected by any accidental spills is at a depth of approximately 30 feet with a total dissolved solids concentration ranging from 300 to 600 mg/l. The application addresses how spills, leaks, and other accidental discharges to the surface will be managed.

OIL CONSERVATION DIVISION RECEIVED

'91 DE: 10 AM 9

(BW-15) - Marathon Road Water Station, C. W. Trainer, 8090 E. Kelli Dr., Scottsdale, Arizona 85260, has submitted a renewal application for the previously approved discharge plan for their in situ extraction brine well facility. The Marathon Road Water Station is located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1630 to 2400 feet and brine is extracted with an average total dissolved solids concentration of about 321,000 mg/l. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-22) - Quality Brine, Inc., Stan Watson, P.O. Box 75, Tatum, New Mexico 88267, has submitted a renewal application for the previously approved discharge plan for their in situ extraction brine well facility. The Quality Brine Water Station is located in the SW/4 SW/4, Section 20, Township 12 South, Range 38 East, NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 2300 to 2900 feet and brine is extracted with an average total dissolved solids concentration of about 350,000 mg/l. Groundwater most likely to be affected by an accidental discharge is at a depth of 30 to 40 feet with a total dissolved solids concentration ranging from 700 to 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. 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 public hearing may be requested by any interested person. Requests for 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 New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October, 1991.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION WILLIAM J. LEMAY, Director Journal, December 9, 1991

# Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterrupted for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled  
 Notice of Publication

and numbered \_\_\_\_\_ in the \_\_\_\_\_ Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) consecutive weeks, beginning with the issue of \_\_\_\_\_ October 30, 19 91 and ending with the issue of \_\_\_\_\_ October 30, 19 91

And that the cost of publishing said notice is the sum of \$ 60.67

which sum has been (Paid) ~~(unpaid)~~ as Court Costs

*Joyce Clemens*  
 Subscribed and sworn to before me this 12th day of November, 19 91  
*Ms. Jan Sewer*  
 Notary Public, Lea County, New Mexico  
 My Commission Expires Sept. 28, 19 94

LEGAL NOTICE  
 NOTICE OF PUBLICATION  
 STATE OF NEW MEXICO  
 ENERGY, MINERALS AND  
 NATURAL RESOURCES  
 DEPARTMENT  
 OIL CONSERVATION  
 DIVISION  
 Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088. Telephone (505)827-5800:  
 (GW-68) Williams Field Services Company, Sandy Fishler, Environmental Specialist, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Simms Mesa Compressor Station located in the NW/4 NE/4, Section 22, Township 30 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 75 gallons per day of wastewater will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 160 feet with a total dissolved solids concentration estimated to range from 600 to 900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.  
 (GW-1) Bloomfield Refining Company, David Roderick, Refinery Manager, P.O. Box 159, Bloomfield, New Mexico 87413, has submitted a renewal application for the previously approved discharge plan for its Bloomfield Refinery located in the NW/4 SE/4 and the S/2 NE/4 and the N/2 NE/4 SE/4 of section 27, and the S/2 NW/4 and the N/2 NW/4 SW/4 and the SE/4 NW/4 SW/4 and the NE/4 SW/4 of section 26, Township 29 North, Range 11 West, NMPM, San Juan County New Mexico. The renewal application consists of an evaluation proposal of the refinery waste water system with the objective of eliminating all unlined storage facilities. Groundwater most likely to be affected by any accidental spills is at a depth ranging from 10 to 30 feet and is a water zone directly caused by seepage from Hammond Ditch. The ditch water has a total dissolved solids concentration of approximately 200 mg/l. The previously approved discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.  
 (GW-74) Halliburton Company, Matt D. Ratliff, Environmental Engineer, P.O. Drawer 1431, Duncan, Oklahoma 73536-0100, has submitted a discharge plan

facility located in Section 7, Township 18 South, Range 39 East, NMPM, Lea County, New Mexico. Approximately 135 gallons per day of waste water is stored in below grade fiberglass tanks prior to disposal in an OCD approved offsite disposal facility. Groundwater most likely to be affected by any accidental spills is a depth of approximately 30 feet with a total dissolved solids concentration ranging from 300 to 600 mg/l. The application addresses how spills, leaks, and other accidental discharges to the surface will be managed.  
 (BW-15) Marathon Road Water Station, C.W. Trainer, 8090 E. Kalil Dr., Scottsdale, Arizona, 85260, has submitted a renewal application for the previously approved discharge plan for their insitu extraction brine well facility. The Marathon Road Water Station is located in the SW/4 SE/4, Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico. Fresh water is injected into the Salado Formation at an approximate depth of 1930 to 2400 feet and brine is extracted with an average total dissolved solids concentrations of about 321,080 mg/l. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 to 50 feet with a total dissolved solids concentration ranging from 500 to 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.  
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 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. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed

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 public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines the discharge 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 21st day of October, 1991.  
 STATE OF NEW MEXICO  
 OIL CONSERVATION DIVISION  
 WILLIAM J. LEMMON, Director  
 Published in the Lovington Daily Leader October 30, 1991.

State of New Mexico  
Energy, Minerals and Natural Resources Department  
OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, NM 87501

5/91

OIL CONSERVATION DIVISION  
RECEIVED

1991 OCT 16 AM 9 02

**DISCHARGE PLAN APPLICATION FOR BRINE EXTRACTION FACILITIES**

(Refer to OCD Guidelines for assistance in completing the application.)

NEW  RENEWAL

- I. FACILITY NAME: Marathon Road Water Station
- II. OPERATOR: C. W. TRAINER  
ADDRESS: 8090 E. Kalil Dr. Scottsdale, Arizona 85260  
CONTACT PERSON: Gene Lee PHONE: 622-7355
- III. LOCATION: SW /4 SE /4 Section 25 Township 19 South Range 34 East  
*Submit large scale topographic map showing exact location.*
- IV. Attach the name and address of the landowner of the facility site.
- V. Attach a description of the types and quantities of fluids at the facility.
- VI. Attach a description of all fluid transfer and storage and fluid and solid disposal facilities.
- VII. Attach a description of underground facilities (i.e. brine extraction well).
- VIII. Attach a contingency plan for reporting and clean-up of spills or releases.
- IX. Attach geological/hydrological evidence demonstrating that brine extraction operations will not adversely impact fresh water.
- X. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XI. CERTIFICATION

*I hereby certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that 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.*

Name: C W. Trainer Title: Owner

Signature: C. W. Trainer Date: 9-1-91

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

**C. W. TRAINER**  
**Discharge Plan # BW-15**  
**ATTACHMENTS**

- IV. The landowner at the Marathon Road Water Station is the Bureau of Land Management. (US Government). A right of Way is issued to C. W. TRAINER for the surface area around the facility as well as a sodium lease consisting of 240 acres. This is all on record at the BLM office in Santa Fe, N.M.
- V. At Marathon Road Water Station, two types of fluids are contained. The first is **fresh water**; containing approx. 17,000 bbls in the lined fresh water pond and another 1250 bbls in the vertical steel storage tank. The second type of fluid is **high TDS Salt Water**. The lined brine storage pond is capable of holding 25,000 bbls, however, an average is approx. 12,000 bbls in the lined brine storage pond and another 1250 bbls in a coated vertical steel storage tank. The salt water had a TDS of 321,083 mg/l and a chloride content of 192,000 mg/l. No solids are produced, contained, or allowed to be disposed of at Marathon Road Water Station. This facility is not a disposal facility and no toxic materials are in storage.
- VI. See the attached diagram of fluid transfer and storage facilities.
- VII. See attached diagram of brine extraction well.
- VIII. At Marathon Road Water Station, all of the fresh and brine lines are inspected 3-4 times daily. Any leaks in any of the brine lines are unlikely since they operate at very low pressures. A leak of any kind will be reported to the OCD immediately with the location, type of leak and approximate volume of any leak. The greatest possibility of leakage is around the truck loading valves on the brine water manifold. The truck loading area is on a grade that is higher so any spilled brine water will run back into the new proposed brine storage pond. A concrete area at each truck valve will be installed to catch any brine spilled as a result of connecting a truck to the valve. This will also drain back into the proposed brine storage pond. Any spills will be reported within 24 hours of any occurrence.
- IX. See original geology and hydrology submitted for discharge plan.
- X. Well records and bond is currently on file with the OCD.

**SEE OTHER ATTACHMENTS.**

# MARATHON ROAD WATER STATION BRINE EXTRACTION WELL DIAGRAM

8 5/8" 24# J-55 Csg. set @ 328'  
cement circulated to surface

5 1/2" 15.5# J-55 Csg set @ 1911'  
cemented with 1050 sx. Class "C".

Circulated to surface.

SALT SECTION

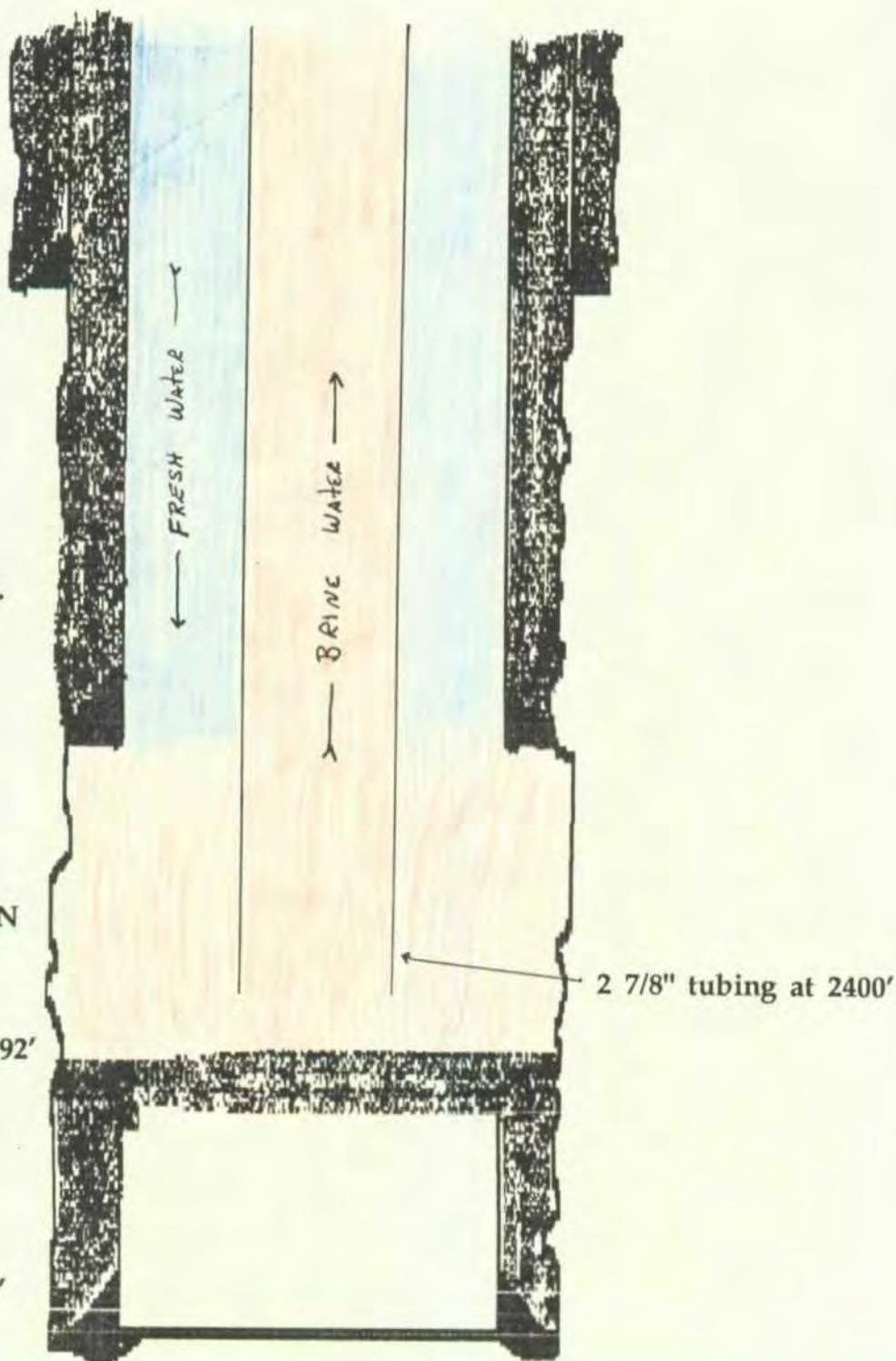
Cement plug.

(150 sx. Class "C") from 3114' to 2992'

Top of 5 1/2" cut off at 3362'

5 1/2" 15.5# J-55 Csg. set @ 5105'  
cut & pulled from 3382'

Cement w/ 300 sx.



August 25, 1991

**Kathy Brown**  
**Energy, Minerals and Natural Resources Department**  
**P.O. Box 2088**  
**State Land Office**  
**Santa Fe, New Mexico 87504**

**RE: Discharge Plan BW-15**  
**Marathon Road Water Station**  
**Lea County, New Mexico**

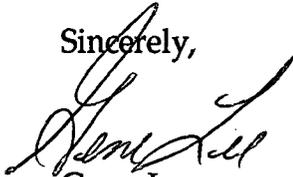
**Dear Ms. Brown,**

Please find enclosed a copy of the renewal of Discharge Plan BW-15 for Marathon Road Water Station. This renewal plan addresses some of the changes that have occurred at Marathon Road Water Station since the original discharge plan was submitted and approved.

I would also like to address some of the comments of your letter dated May 30, 1991 which are also attached to this letter.

Please have your engineering staff examine the proposed changes at Marathon Road Water Station and advise me of any suggestions or recommendations to correct the comments of your May 30, 1991 letter. I am enclosing a copy of the proposed pit lining and leak detection system which I hope meets OCD approval. If you have any further questions or comments, please call or write. Thank you for your cooperation in this matter.

Sincerely,



Gene Lee

XC: C. W. Trainer

## COMMENTS:

### 1. BRINE LOADING AREA

The truck loading area along the brine manifold has been a difficult area to contain spillage to a bare minimum. The spillage that has been noted at the loading valves are due to the amount of brine that is spilled when disconnecting the hoses from the valve to the truck. By placing the new proposed brine storage pond directly against the manifold, this would allow any spillage to run directly back into the brine storage pond. Concrete spill pads will be constructed with a grade running back to the brine pond. These will also be curbed up along the outer edge to facilitate containing any spillage. See the attached diagram showing the grade from the truck loading area to the brine pond and diagram of the concrete spill pads. The sprinklers that are currently in place at Marathon Road Water Station were an attempt to provide a suitable method to irrigate grass that was planted between the brine loading manifold and the existing brine pond. This grass was also planted east of the fresh water manifold and around the entire fresh water pond. Approximately \$6,000.00 were spent in an attempt to make M.R.W.S. more aesthetically pleasing. These sprinklers were in no way an attempt to dissolve any brine crusts or to leach any salt water spills. Upon examination of M.R.W.S., you will find a substantial growth of grass around the fresh water pit. This area was successful in growing the grass seed that was planted. Trees were also planted along the perimeter fence around the water station and many were destroyed due to varmints.

### 2. SUMPS

As was explained in #1 above, the grade along the brine manifold as well as the new concrete spill pads will alleviate any need for any sumps. The construction of the new proposed brine storage pond will be such that it will be the lowest point around and will allow for any spillage to drain directly back into the brine pond. This pond will have an approved leak detection system. This should prove to be much more effective than a brine sump.

### 3. MECHANICAL INTEGRITY TESTING

A pressure test will be conducted by the open hole method. The OCD will be notified in time to witness this test. The normal pressure for making brine runs 450#. With the fresh water being injected down the casing, any leak would be fresh water instead of brine water. The 8 5/8" and 5 1/2" casings are both cemented back to the surface to prevent any possible leak into the fresh water aquifer. The pressure test results will be submitted to the OCD as required. The fresh water line going to the brine extraction well is a steel line with a pressure rating of 7000#. The average pressure on this line is 450#. No leaks from this line would contaminate any ground water. The return line

from the brine extraction well is 10 yrs old and is made of Schedule 40 PVC pipe with a working pressure rating of 160#. It is a return line and maximum pressure will not exceed 35#. These lines are examined every day several times a day and any leak will be easily detected. Upon finding a leak in the brine return line, the valves will be closed immediately stopping any possible flow. A leak will be reported to the OCD within 24 hrs notifying of any major leak or discharge.

4. **TRANSFER OF COMMITMENT**

All regulations placed in effect by the EID and carried over to the OCD will continue to be obeyed and any spills will be reported to the OCD within 48 hours of the event.

5. **VOLUMES OF INJECTION FLUIDS AND BRINE**

A report of the monthly volume of brine water produced and sold will be compared to the amounts injected and a report filed monthly with the OCD. A request has recently been sent to the BLM for the total amounts of brine produced. Once this amount is received, it will be forwarded to your office. Volume reports will be maintained and mailed to your office each quarter. Subsidence potential is not a problem in this area as is proven by the WIPP studies of the salt beds in Southeastern New Mexico. This information is available from the DOE.

6. **BRINE STORAGE POND AND MONITOR WELL**

The current brine storage pond will be pumped dry and converted into another fresh water storage pond. A new proposed brine storage pond will be constructed between the brine loading manifold and the west edge of the current brine storage pond. Construction of this pond will be consisting of two high density polyethylene liners with a geotextile membrane between the two liners. This is an approved leak detection system as outlined in your Engineering Guidelines for Construction of such ponds. A sample of the construction is being attached for your inspection and approval. After you have reviewed this type of construction, any comments or suggestions would be appreciated. The truck loading area will have a grade such that any spillage will run back into the proposed brine storage pond. A diagram is attached for the M.R.W.S. facility showing current and proposed ponds and piping. The monitor well will continue to be sampled annually and a report sent to the OCD. The leak detection system will be installed and examined daily. Please note that the attachments are for a double lined pond with leak detection system to be installed. I am confident that you will find all of the plans satisfactory and meeting your engineering design guidelines. A time schedule for completion of this work will be submitted pending availability of construction materials and crews. Please notify M.R.W.S. as soon as possible

of your thoughts and suggestions pertaining to the proposed double lined brine pond. This will facilitate ordering materials and arranging for the necessary equipment and construction crews.

If you have any further questions or comments, please do not hesitate to write or phone at any time. Your input is requested and valued pertaining to the proposed brine pond. Our goal is to achieve a brine facility that is within your guidelines for water quality control. We hope to make Marathon Road Water Station fall within your guidelines for many years to come and not just for the next few months or years. Thank you for your help in this matter.

Sincerely,

Gene Lee  
622-7355  
1306 Meadow Lane  
Roswell, New Mexico 88201

xc: cwt

# **WELTANCO LINING INC.**

Lining & Secondary Containment Specialists

**WELTANCO LINING INC.  
PROPOSAL NO. 91090601  
for  
C.W. TRAINER  
NEW MEXICO  
DOUBLE LINED HOLDING POND**

September 6, 1991

## **1.0 GENERAL**

- 1.1 WELTANCO LINING INC. proposes to supply 40 mil and 60 mil high density polyethylene (HDPE) flexible membrane liner and installation for your double lined holding pond.
- 1.2 Our technicians have over 38,000,000 square feet of installation experience.
- 1.3 We estimate a work schedule of 5 days based upon working Monday through Saturday, 10 hours per day.
- 1.4 We will require a written notice to proceed as well as the customary mobilization notice of one week to ensure that materials, etc. arrive at the job site in a timely manner.

## **2.0 SCOPE OF WORK**

### **2.1 WELTANCO LINING INC. will furnish the following materials and services:**

- 2.1.1 Supply and installation of approximately 19,000 sq. ft. of net lined area, which is defined as all lined surface parallel to the grade or slope, including all sacrificial materials, rubsheets and any material designed to be buried in anchor trenches. It does not include waste nor material used as overlap.
- 2.1.2 Either geonet PN-3000-CN or AMOCO 4508 geotextile used as a drainage media between the liner system.
- 2.1.3 HDPE welding material (rod or resin).
- 2.1.4 Transportation of our personnel, tools and equipment.
- 2.1.5 Non-union technicians, labor, supervision, home office administration and support.
- 2.1.6 Freight to the job site for the materials which we furnish.
- 2.1.7 Our standard inspection and vacuum testing of field seams.
- 2.1.8 Case 580 backhoe to dig the anchor trench.
- 2.1.9 Sealing for 2 pipe penetrations, requiring no batten or bolts.

# WELTANCO LINING INC.

Lining & Secondary Containment Specialists

2.2 The following items are excluded from our scope and are to be provided by others:

- 2.2.1 Offloading and storage of all materials at the job site. All HDPE and other geosynthetic materials shall be unloaded by crane or front end loader using the slings provided with the material. It is not permissible to use a fork lift or roll the material off the truck. All HDPE liner and other geosynthetic materials shall be stored on 4"x 4" timber to prevent them from sinking into the ground. Storage must be in reasonable proximity to the area to be lined.
- 2.2.2 Clean unrolling and layout area which is free of rocks and other debris.
- 2.2.3 Installation of HDPE embedment material. All concrete surfaces to be in contact with the geomembrane liner system must be smooth trowel finished, and all edges must be chamfered 1" min. Proper care must be used in compacting the sub-base under all concrete structures.
- 2.2.4 Subgrade preparation, grading, compaction, construction and backfilling of anchor trench, ongoing dewatering, surveying, engineering, nonstandard inspection and testing.
- 2.2.5 This proposal relies upon the accuracy of the drawings, sketches, specifications, correspondence and other descriptive material provided to WELTANCO LINING INC. by the Purchaser and is contingent upon same.

## 3.0 SURFACE PREPARATION

Purchaser shall be responsible for preparing surface to be lined to industry standards so as to ensure optimal conditions with respect to both ease of installation and long term integrity of the liner system. WELTANCO LINING INC. does not accept responsibility for surface or subsurface conditions, nor for the consequences thereof. We do reserve the right to determine suitability of the surface for the lining operation prior to commencing work.

## 4.0 PRICE AND PAYMENT

4.1 WELTANCO LINING INC. proposes to supply the materials and labor described herein for the lump sum price of not less than \$27,233.00.

To dig and backfill the anchor trench per attached drawing, please deduct \$450.00 from the above price.

For supplying three (3) laborers for the duration of the project, please deduct \$1,250.00 from the above price.

The pricing herein includes a single layer of Polynot PN-3000-CN. Please deduct \$500.00 from the above price if we substitute AMOCO 4508.

Any additional net lined area will be priced on a pro rata basis.

# WELTANCO LINING INC.

Lining & Secondary Containment Specialists

- 4.2 We have included 1 weather delay day for the project. Weather delay days beyond those specified will be charged to the purchaser at a rate mutually agreeable to both parties at the time of each occurrence. In no case shall the sum be less than our actual costs incurred. Change orders and extra work shall be on a time and material basis per the attached standard rate schedule. If we are delayed in the execution of the work by any act or omission of the owner, consultant, general contractor, any subcontractor, or any other cause beyond our control, the contract time shall be extended and standby delay costs shall be \$2,250.00 per day.
- 4.3 In no event shall WELTANCO LINING INC. be liable for any direct, indirect, incidental, special or consequential damages.
- 4.4 We have included 1 mobilization(s) for the performance of our work hereunder. The charge for additional mobilizations which occur for reason(s) beyond our control will be \$3,500.00.
- 4.5 This proposal is valid for acceptance by 9-30-91.
- 4.5 The pricing herein excludes sales tax, bonds, special insurance and the like.
- 4.6 Payment is seventy-five percent upon shipment and delivery of the HDPE liner material and twenty-five percent upon completion of the installation, each net ten days.

## 5.0 SAFETY

The lining material is very slippery. Therefore, the purchaser must instruct all personnel to exercise diligence when walking near or on the liner. The hazard of slipping is compounded when there is moisture on the liner.

Accepted by \_\_\_\_\_  
Company

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

Estimated starting date, subject to section 1.4: \_\_\_\_\_

## INSTALLATION WARRANTY

WELTANCO LINING INC. hereby warrants that the membrane liner installed by it shall be free from defects in workmanship for a period of one (1) year from the date upon which the material was installed, subject to the conditions below.

This limited warranty covers only defects in workmanship occurring during the installation of the liner. The warranty of the manufacturer rather than WELTANCO LINING INC. shall apply to the liner material. This limited warranty does not cover any damage to or defects in the liner found to have been a result of misuse, abuse or conditions existing after it was installed, including, but not limited to, rough handling, malicious mischief, vandalism, sabotage, fire, acts of God, acts of the public enemy, acts of war or public rebellion, severe weather conditions of all types, ice, excessive stress from any source, floating debris, machinery, foreign objects, or animals, nor does this limited warranty cover any defects which are found to have been a result of improper or defective design or engineering.

The following procedure shall be followed in submitting a claim under this limited warranty:

1. Purchaser shall give WELTANCO LINING INC. written notice of the facts and circumstances of the claim within 10 days of becoming aware of the facts and circumstances. Notice shall be by registered or certified mail, return receipt requested, postage prepaid, addressed to WELTANCO LINING INC., 14780 Memorial Drive, Suite 211, Houston, Texas 77079-5284. The words "Installation Warranty Claim" shall be clearly marked on the face of the envelope in the lower right hand corner. Said notice shall contain, at a minimum, the name and address of the owner, the name and address of the installation, the date upon which the material was installed and the facts known to Purchaser, upon which the claim is based. Failure to strictly comply with all the requirements of this paragraph shall void this warranty.
2. Within thirty days, WELTANCO LINING INC. will notify Purchaser either that it will send a representative to inspect the allegedly defective installation or that it does not wish to do so. In the event WELTANCO LINING INC. determines that the claim is not covered by this warranty, Purchaser shall pay the expenses incurred by WELTANCO LINING INC. at its then current standard rates and conditions.
3. Purchaser shall not undertake or allow the repair, replacement, removal, alteration, or disturbance of any liner prior to such inspection or receipt of WELTANCO LINING INC.'s notice that it elects not to inspect. Failure to strictly comply with this paragraph shall void this warranty.
4. If WELTANCO LINING INC. determines the alleged defects are covered by this warranty, WELTANCO LINING INC. shall, at its sole discretion, either repair the defects in the installation or reinstall the liner. THE REMEDIES PROVIDED HEREIN ARE THE EXCLUSIVE REMEDIES AVAILABLE UNDER THIS WARRANTY.
5. Purchaser agrees that it shall provide WELTANCO LINING INC. with clean, dry and unobstructed access to the liner in order for WELTANCO LINING INC. to perform the inspections and warranty work hereunder.

THE REMEDIES PROVIDED TO PURCHASER HEREIN ARE THE EXCLUSIVE REMEDIES AVAILABLE UNDER THIS LIMITED WARRANTY. NEITHER THIS WARRANTY NOR ANY RIGHTS HEREUNDER SHALL BE ASSIGNABLE. WELTANCO LINING INC. SHALL HAVE NO LIABILITY UNDER THIS WARRANTY TO THIRD PARTIES OR STRANGERS TO THIS AGREEMENT. THE WARRANTY SET FORTH ABOVE IS THE ONLY WARRANTY APPLICABLE TO THE INSTALLATION OF THE LINER AND ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE ARE DISCLAIMED. IN NO EVENT SHALL WELTANCO LINING INC. BE LIABLE FOR ANY DIRECT, INDIRECT, INCIDENTAL, SPECIAL OR CONSEQUENTIAL DAMAGES FOR, RESULTING FROM, OR IN CONNECTION WITH, ANY LOSS RESULTING FROM THE USE OF THE LINER. WELTANCO LINING INC.'S TOTAL LIABILITY HEREUNDER SHALL NOT EXCEED THE AMOUNT PAID DIRECTLY TO IT BY PURCHASER FOR INSTALLING THE LINER.

Any waiver of the terms and conditions of this warranty shall be in writing and signed by an authorized officer of WELTANCO LINING INC. The failure of WELTANCO LINING INC. to insist upon strict compliance with any of the terms and conditions contained herein shall not act as a waiver of strict compliance with all of the remaining terms and conditions.

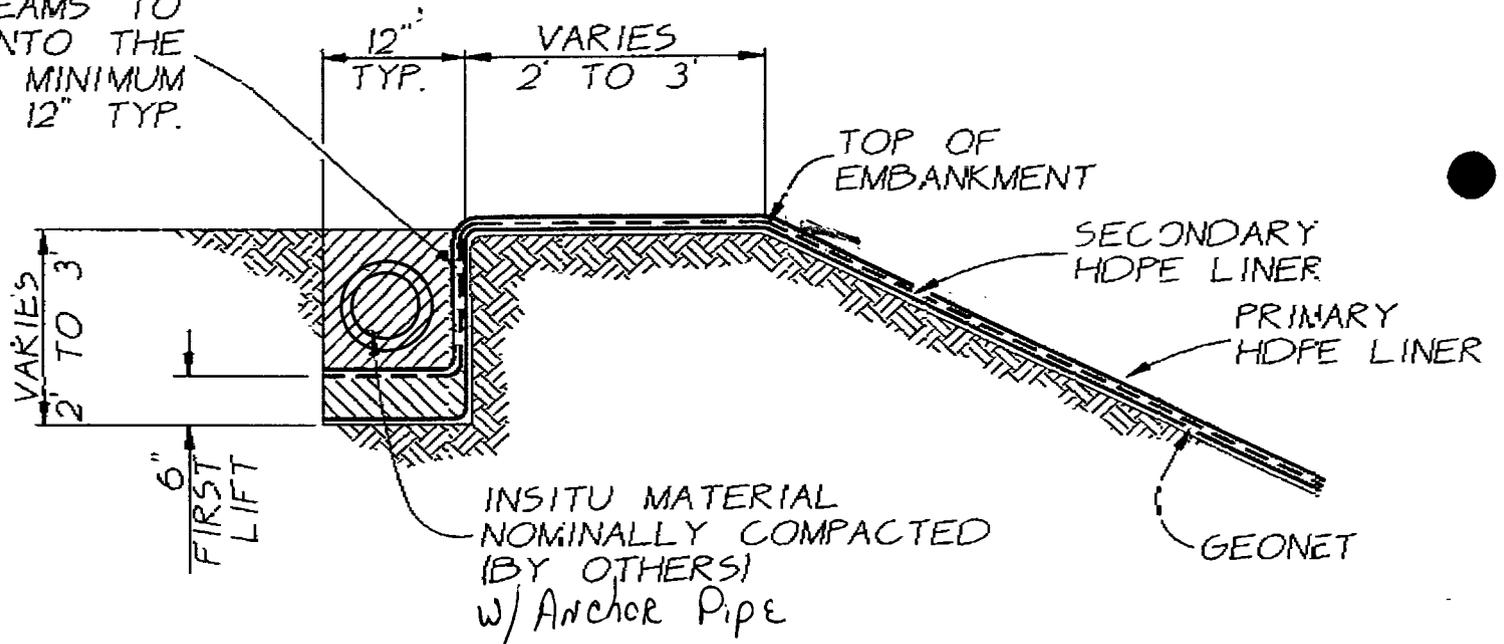
**POLY-FLEX HDPE SPECIFICATIONS****Typical Properties: 60 mil.**

<b>Property</b>	<b>Test Method</b>	<b>Test Results*</b>
Thickness, mils, minimum	ASTM D 1593	54
Density (g/cc), minimum	ASTM D 1505	0.94
Melt Index (g/10 min., maximum)	ASTM D 1238	0.4
Carbon Black content (%)	ASTM D 1603	2-3
Carbon Black Dispersion	ASTM D 3015	A-2
<b>Tensile Properties</b>	<b>ASTM D 638</b>	
1. Tensile Strength at Yield (pounds/inch width)	Type IV specimen at 2 inches/minute	150
2. Tensile Strength at Break (pounds/inch width)		250
3. Elongation at Yield (%)		13
4. Elongation at Break (%)		750
5. Modulus of Elasticity (1% secant; pounds/square inch)		90,000
Tear Strength (lbs.)	ASTM D 1004 Die C	47
Puncture Resistance (lbs.)	**FTMS 101 C 2031	260
Hydrostatic Resistance (lbs./square inch)	ASTM D 751	495
Low Temperature Brittleness	ASTM D 746	<-94° F
Dimensional Stability (% change max.)	ASTM D 1204 212° F, 15 min.	± 1
Volatile Loss (%)	ASTM D 1203	0.4
Resistance to Soil Burial (% change max. in orig. value)	ASTM D 3083 type IV specimen at 2 inches/minute	
A. Tensile Strength at Yield & Break		10
B. Elongation at Yield & Break		10
Ozone Resistance	ASTM D 1149 7 days, 100 pphm 104° F, bent loop	no cracks
Environmental Stress Crack (hours)	ASTM D 1693 Condition C (modified NSF 54)	>2000
Water Absorption (% change max in original weight)	ASTM D 570	0.1
Coefficient of Linear Thermal Expansion (cm/cm · °c) x 10 <sup>-4</sup>	ASTM D 696	1.2
Moisture Vapor Transmission Rate (g/100 in <sup>2</sup> · day)	ASTM E 96 100° F, 100% relative humidity	0.020

\* All values, except when specified as minimum or maximum, represent average lot property values.

\*\* Federal Test Method Standards.

ALL LINER SEAMS TO BE WELDED INTO THE ANCHOR TRENCH A MINIMUM OF 12" TYP.



**TYPICAL DOUBLE ANCHOR TRENCH DETAIL**  
SCALE: NONE

"THE INFORMATION CONTAINED ON THIS DRAWING AS IT RELATES TO PRODUCTS, METHODS AND TECHNIQUES ARE THE PROPERTY OF WELTANCO LINING INC. THE USE, REPRODUCTION OR DISCLOSURE IS STRICTLY PROHIBITED WITHOUT WRITTEN PERMISSION"

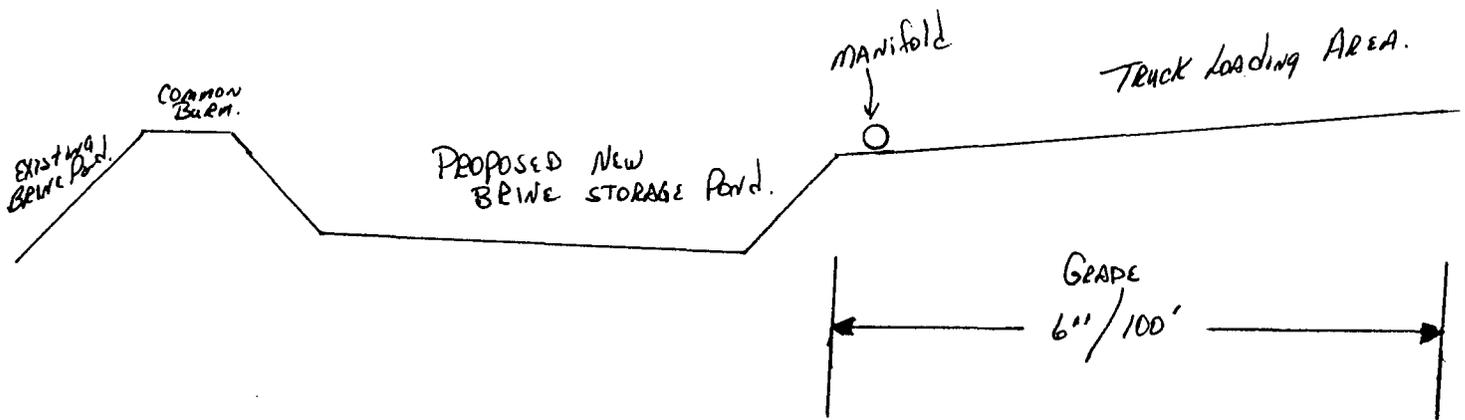
14780 Memorial Dr. Suite 211 Houston, Texas USA 77079-5284		
DRAWING TITLE	PROJECT	DWS. NO.
TYP. DOUBLE ANCHOR TRENCH DETAIL		WLI-6

  
**WELTANCO LINING INC.**  
 Lining & Secondary Containment Specialists

(713) 496-5484 Fax (713) 496-9124		PROJECT TITLE	DRAWN	DATE	SCALE	REV
			<i>ML</i>	8-29-91	NOTED	0

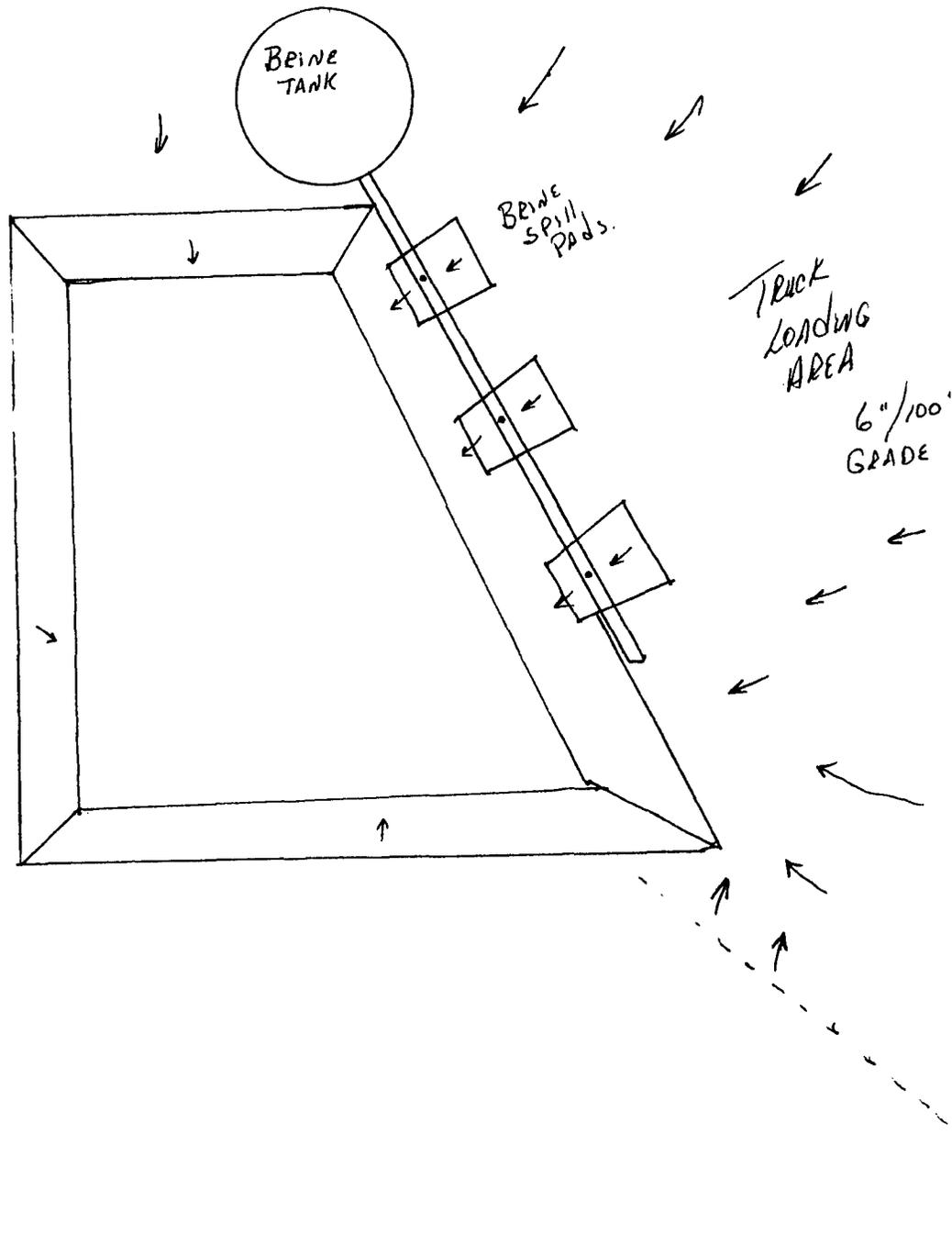
# MARATHON ROAD WATER STATION (ATTACHMENTS)

## CROSS-SECTION OF GRADE AT TRUCK LOADING AREA



MARATHON ROAD WATER STATION  
(ATTACHMENTS)

PROPOSED GRADE  
AT TRUCK LOADING  
AREA

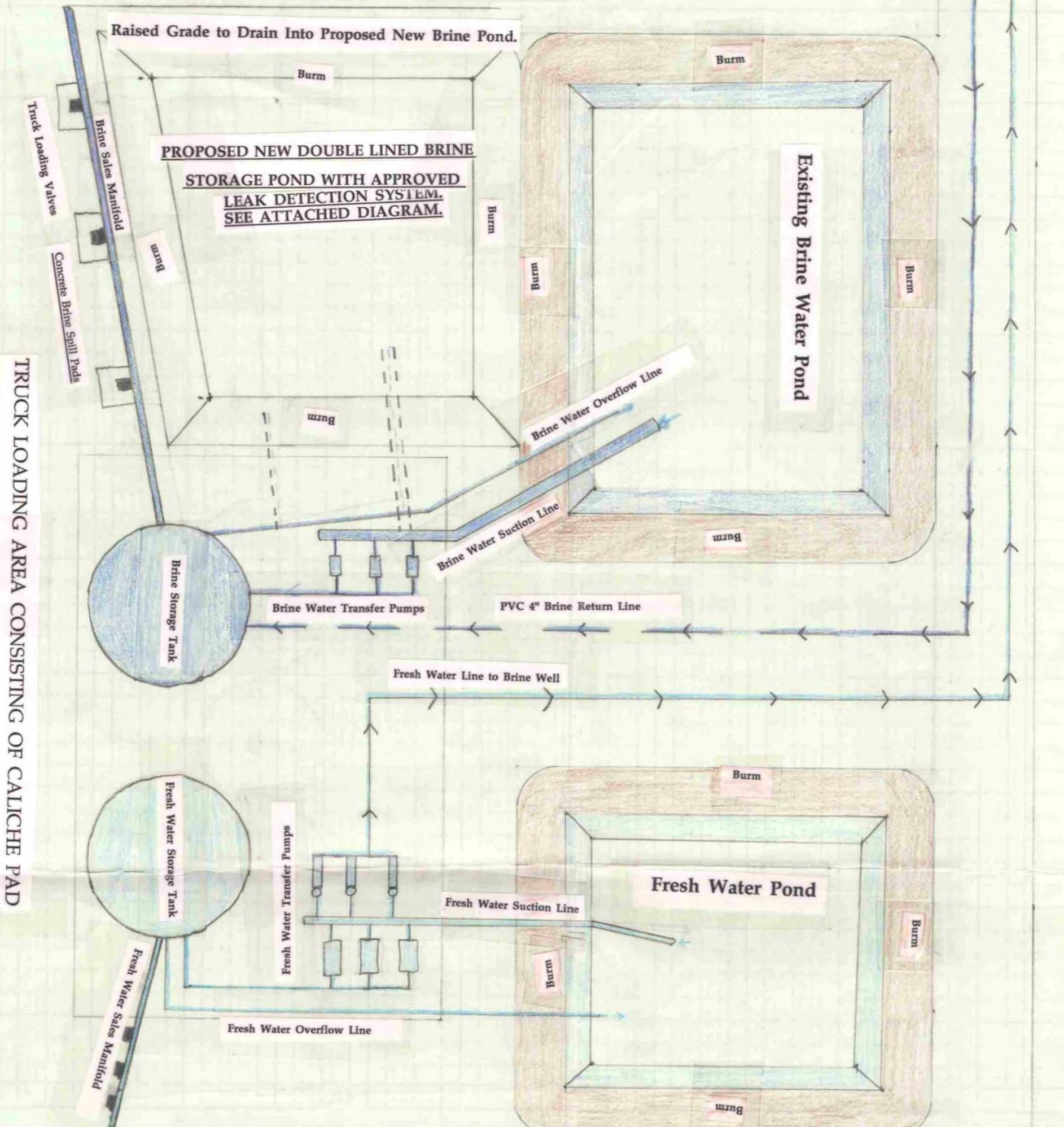


W. TRAINER  
Marathon Road Water Station  
Brine and Fresh Water Sales  
Facility Diagram

NORTH

BRINE EXTRACTION WELL

SEE DIAGRAM



MARATHON ROAD---(Paved Highway)

TRUCK LOADING AREA CONSISTING OF CALICHE PAD

# Memo

*From*

**KATHY BROWN**  
*Geologist*

*To Mr. Gene Lee,*

*Here are the OCID guidelines for construction of ponds/pits. If you have any questions on the pond or anything else concerning the discharge plan feel free to contact me at 505-827-5824.*

*If you decide to double-line your pond and use the current liner as the bottommost liner, you will first need to prove that it is not leaking.*

*Thanks,  
Kathy Brown*

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

May 30, 1991

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

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-138

Mr. C. W. Trainer  
8090 East Kalil Drive  
Scottsdale, Arizona 85260

RE: Discharge Plan BW-15 (formerly DP-361)  
Marathon Road Water Station  
Lea County, New Mexico

Dear Mr. Trainer:

On May 16, 1985, the ground water discharge plan, BW-15 for the Marathon Road Water Station located in Section 25, Township 19 South, Range 34 East, NMPM, Lea County, New Mexico, was approved by the Director of the Environmental Improvement Division (EID). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval expired on May 16, 1990. Authority to administer the brine program was transferred from the EID, back to the Oil Conservation Division (OCD) in 1989 with staffing approved in 1990. Please note the new discharge plan number (BW-15), formerly DP-361, which will be the permanent designation used in all future correspondence.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. Since your discharge plan has expired, please submit your application for renewal of plan approval within sixty days of receipt of this letter. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal. To assist you in preparation of your renewal application, I have enclosed an application form and a copy of the OCD's Guidelines for Preparation of Ground Water Discharge Plans at Brine Extraction Facilities, revised May 1991, and a copy of the Water Quality Control Commission Regulations.

The OCD visited your operation of February 5, 1991, as part of an extensive multifacility inspection trip that week. Because of scheduling problems, and the numerous facilities visited, we were unable to notify you of the date and time of arrival in advance. Although not required our agency generally notifies operators in advance giving time of arrival; in this instance it was not possible to do so.

The following comments are based on observations during the OCD site visit on February 5, 1991, and on additional requirements detailed in the guidelines. Please address these comments in your discharge plan renewal application.

1. Brine Loading Area

The loading area showed evidence of significant brine discharges to the ground surface, specifically, around the three truck loading valves. A large amount of spilled brine was also observed in the open area just east of the brine loading rack. These areas must be cleaned-up and kept clean. Because spilled brine has been observed at these locations on several previous inspections by OCD and EID staff, this area must have containment to keep spilled brine off of the ground surface. Submit a proposal to contain spills at your brine loading area. Include an explanation and diagrams detailing how spilled brine is to be contained, including paving and curbing where appropriate, and where the brine drains to. Sprinklers were observed in the previously-mentioned, brine contaminated area east of your brine loading rack. Explain the purpose of the sprinkler system. The OCD prohibits spraying of either brine or fresh water onto the ground surface to dissolve brine crusts.

2. Sumps

Collection of spilled brine in the loading area must be drained to either your sump at the north end of the loading rack or to a newly constructed sump. All new underground tanks (ie. sumps) are required to have positive leak detection. All present underground tanks that do not have leak detection are required to be cleaned out and visually inspected on an annual basis. Submit to the OCD a schedule for annual inspection of your current sump and construction plans for any new sumps that you plan to install. Enclosed is a copy of the OCD's Guidelines for the Selection and Installation of Below Grade (produced) Water Tanks. Sumps must be maintained so that collected brine does not overflow to the surface. How is the brine to be removed from the sumps?

3. Mechanical Integrity Testing

Pursuant to revised OCD guidelines for discharge plans at brine facilities, all wells must be pressure tested (open-hole) to 500 psi for 4 hours on an annual basis. A pressure test isolating the casing from the formation using either a bridge plug or a packer must be conducted at least once every 5 years or during well workovers. The results from a current pressure test will be required prior to the approval of any brine facility discharge plan application or renewal. If the immediate test is performed using the open-hole method then a pressure test isolating the casing from the formation is required within the next 1 1/2 years. Note that an OCD representative must be on site to witness all pressure tests. Submit a proposal for testing and ensuring the mechanical integrity of the well. Also, submit information on any buried brine pipelines including age and material of the lines.

4. Transfer of Commitment

Notwithstanding the transfer of jurisdiction of brine wells to OCD, all prior commitments to EID concerning reporting and notification remain in effect. Note that all unauthorized discharges (ie. major leaks and spills), need to be reported to the OCD within 48 hours of the event (WQCC Rule 5-208).

5. Volumes of Injection Fluids and Brine

The OCD requires a quarterly report listing, by month, of the volume of fluids injected and produced for comparison to detect underground losses. The OCD has no volume reports on file for the Marathon Road Water Station. Submit a proposal and schedule for reporting injection fluid and brine production volumes. Also, submit the date of first brine production and the total volume of brine produced to date. This information is necessary to evaluate subsidence potential at the Marathon Road Water Station.

6. Brine Storage Pond and Monitor Wells

Attached is a chronological listing of the chemical analyses for chlorides and total dissolved solids in samples obtained from your monitor well located on the north side of your brine pond. This data confirms groundwater contamination based on the elevated levels of chlorides and total dissolved solids. The most obvious source of the contamination is your single-lined, brine storage pond. Unless you can adequately prove that your brine storage pond is not leaking, the OCD will require that the pond be double-lined. Submit a plan and time schedule for addressing possible problems with your brine storage pond consistent with one of the following OCD approved options:

- A. Using an approved technical method, inspect your liner for leaks. Obtain OCD approval of the proposed method prior to testing. Note that visual inspection is not an acceptable method. Submit the results to the OCD within 7 days of the test. If sufficient evidence is provided to the OCD indicating that your liner is not leaking, you will be permitted to continue using your current single liner, brine storage pond. Continued use of this pond will require inspection for leaks on an annual basis and sampling and analysis of your monitor well on a quarterly basis. Sampling methods must follow the OCD procedures outlined in the enclosure Oil Conservation Division Field Sampling Procedures. Submit a description of your sampling program and a commitment to provide the OCD with quarterly test results.

- B. Install a double-liner with positive leak detection. Construction and specifications are detailed in the enclosure Engineering Design Guidelines for Construction of Waste Storage/Disposal Ponds. If you plan to use your current liner as the lowermost liner, you must first provide evidence that the liner is not leaking. The leak detection system must be checked monthly, recorded, and results submitted to the OCD on a quarterly basis along with your quarterly volume reports. If a double-liner with leak detection is installed, the OCD will require annual (vs. quarterly) sampling and analysis of your original monitor well to continue monitoring the present groundwater contamination.

Addressing the above items in your application for renewal of your discharge plan will accelerate the review and response time of your application. Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges a discharge plan renewal is not needed, please notify this office. If you have any questions, please do not hesitate to contact Kathy Brown at (505) 827-5824.

Sincerely,

  
David G. Boyer, Hydrogeologist  
Environmental Bureau Chief

DGB/KMB/sl

Enclosures

cc: OCD Artesia Office

INVENTORY OF SOLUTION MINING WELLS -- OIL CONSERVATION DIVISION, 1991

BW-15 (OP-361)

I. OPERATOR/LOCATION INFORMATION

Operator: C.W. Trainer - Owner

Address: 8090 East Kalil Dr., Scottsdale AZ, 85260

Contract Operator: Gary Elliot, Lovington, 676-2631

Contract Paper Work: Dama Heller, Oil Reports, Hobbs, 393-2727 Phone: 602-443-4641

Well Unit # \_\_\_\_\_ Location Marathon Road Water Station

T. 19S R. 34E Sec. 25 SW 1/4 of SE 1/4 N Facility  
SE 1/4 of SE 1/4 P Well

County: Lea

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

Brine Supply

II. DRILLING/SITING INFORMATION

Contractor: Foster Drilling Company - Cabot Corp. Federal No. 1

Date drilling started \_\_\_\_\_ Date drilling completed 9-15-58

Drilling method Rotary

Ground Surface Elevation 3735' KB Elevation 3746' (RT)

Total depth of hole 4100' (original hole)

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

Type of drilling fluid Salt-Starch, Zeogel mud 10.1 ppg

Describe all casing tests performed to date \_\_\_\_\_

<sup>Sept.</sup>  
1983 tested casing & tubing (open-hole) @ 2000 psi for

4-2-84 tested 5 1/2" casing @ 650 psi for SS min water (open hole?)

## CASING, TUBING AND CEMENTING RECORD

	From	To	Size of Hole	Size of Casing OD	Weight per Foot	Sacks of Cement	Estimated Top of cmt.
Original pipe →	0'	328'		8 5/8"	24 #/ft	225	Surface
1981 re-entry additions {	0'	1911' (KB) 1902' (GL)		5 1/2"	14-15 #/ft	1050 (C)	Surface
	0'	≈ 2400'		2 7/8"	6.5 #/ft	150 (Class "C" with) 1% CaCl <sub>2</sub>	

Was salt saturated cementing material used opposite salt formation? No? Class "C" next cement for 5 1/2"

Is site within 1/2 mile of another well? Is so, explain. 2 abandoned

oil wells within 1/2 mile. Have records for both wells showing proper plugging

Type of well-head equipment \_\_\_\_\_

Comments (include problems encountered while drilling, loss of circulation, deviation of hole from vertical, centralizers, used, tools lost or stuck, fracturing techniques used, etc.) Drilled 9-58, P<sub>1</sub>A<sup>d</sup> 3-61. Cut 5 1/2", top @ 3382'.

Reentered 7-15-81. Encountered deep water flowing upwards. Set cement plug @ 3114'. Set new 5 1/2" production casing @ 1911'. Ran 2400' of 2 7/8" tubing.

water from deeper than 1900' since none above this plug.



#### IV. AQUIFER INFORMATION

##### Aquifers in Immediate Area

From	To	Aquifer Description	Amount of Water entering hole	Quality of Water
28'	-31'	Sand-Quat. In monitor well next to brine pit.	0.5 gal/min	900 ppm Cl <sup>-</sup> 6303 ppm TDS

- No significant groundwater in area. Only water in immediate area is minor discontinuous Quat. alluvium (slightly saline) and deeper, Triassic Santa Rosa sand (poor, <0.2 gpm/ft).
  - Ogallala to the N on the mescalero Ridge and to the south. Triassic aquifer to the west.
  - Water quality in Ogallala in area closest by is about 50 to 300 ppm Cl<sup>-</sup> & 500 ppm TDS to north and 3000 ppm TDS to South with an average DTW of 20' to 50'. (EID estimates 20' to 50' + 3500 ppm TDS in area)
  - Had flow from deeper than 1900' when re-entered the well in 1981. No analysis of this water.
- Note: If water quality analysis are available please attach.\*

Source of aquifer description Formation logs

Source of water level and quality data NM water data book

Depth water first encountered during drilling Original hole no water encountered

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

Explain any evidence of water contamination monitor Well shows high

level of Chlorides and TDS starting about mid 1988.

No longer sampling well; still using single-lined pond.

Had a brine spill in Sept. 1989 by vandal (6750 bbl).

\*Note: Snyder Ranch (Lamy Squire) complained of possible water contamination 3-83 since MRWS has no leak detection. Snyder Ranch has 2 wells + 1 pond on ranch. EID concluded it was very unlikely for contamination of Snyder Ranch wells/pond by MWS (4-84). Snyder wells Sec 19 T19S R35E & Sec 26 T19S R34E? →

V. PRODUCTION/BRINE STORAGE INFORMATION

Method of production (describe fully) Brine is pumped from source wells to either a freshwater storage tank ( bbl), or down injection well by a 50 hp turbine which meters injection flows. Pumping rate is 100 bbl/hr or 450 psi with a maximum pressure of 600 psi. Produced brine is pumped up tubing thru a buried 4" PVC pipe 2250' long to pond by a 40hp centrif. pump which meters the brine.

Was well used previously for some purpose other than brine supply yes

If so, explain Drilled as oil well in 1958. P&A'd 1961

Re-entered 1981

Use of brine Drilling fluids (freshwater also sold here).

Source of injection water (be specific) Piped from water wells

<sup>12</sup> <sup>NE</sup>  
15 mile east, 4 mile down gradient in

Sec. 3 T19S, R36E. Rates up to 7000 bbl/day

Date of first production \_\_\_\_\_

Volume of brine produced to date \_\_\_\_\_ (5/81 => TDS = 321,080 ppm, CI = 192,000, Na = 123,000)

Weight of salt removed to date \_\_\_\_\_

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

Calculated size and shape of cavity to date \_\_\_\_\_

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

Explain any evidence of subsidence and any subsidence monitoring No evidence of subsidence; no monitoring of subsidence.

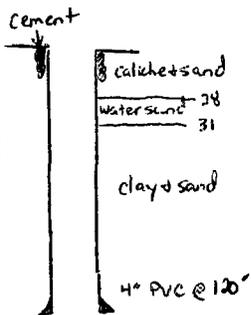
Brine storage facilities (describe) Produced brine is stored in a single-lined pit (39 mil installed in 3 pieces w/ reinforced nylon mesh). Pit is 140' x 140' x 10' w/ a 1:1 slope + holds 25,700 bbl in bottom 9'. Brine is then pumped to 1 brine storage tank -

Explain how brine storage pit is being monitored for leakage Monitor well drilled 7-85. Sampled through 1999. No longer actively being sampled. Needs addressed since evidence of contamination. Cl ↑ 6x, TDS ↑ 4.5x from 2-88 to 8-88.

Explain brine loading procedures Brine is pumped from holding tank to loading rack or a 200' long, 8 5/8" steel pipe with 3 loading valves. Have underground sump @ N end of loading rack + pump which directs brine back to lined pond via pipe.

Explain fresh water loading procedures Fresh water is pumped from tank thru pipe (identical to brine loading rack) and out any one of three loading valves.

- Have freshwater pit (unlined) where the water is collected from the wells. Then it's sucked to the tank where it is either sold or pumped to the injection well to produce brine.



TD 7-20-85  
Sampled 8-14-85  
Cl = 900 ppm  
TDS = 6303 ppm

**VI. ABANDONMENT/PLUGGING RECORDS**

Date well abandoned/plugged Original well March 1961

Reason for well abandonment or plugging Non productive / economic.

Method of plugging or proposed plugging (describe fully, include amounts of cement, etc. top, plug type, depth, etc.) \_\_\_\_\_

List all conduits in the area of review. Include completion and plugging records.

2 abandoned oil wells. Properly plugged by  
records in file.

## VII. CHRONOLOGY OF EVENTS

- 1-4-83: OCD notifies CWT they need DP
- 2-10-83: CWT original submittal of DP to OCD
- 3-14-83 Snyder Ranch (Larry Squire / Sally Box) complaint of no leak detection + single line pit
- 2-2-84 EID's informs CWT of transfer of authority + requires DP
- 5-31-84 CWT submits assurance of discontinuance DP
- 7-13-84 EID's response + request for additional info
- 10-30-84 CWT follow-up submittal of DP (by Lee Wilson & Ass.)
- 12-26-84 EID's response - ready to approve w/ commitment to 5 requests
- 3-15-85 CWT's submittal of final draft of DP addressing 5 requests
- 5-8-85 - CWT commitment to construct monitor well
- 5-16-85 EID's approval of DP-361
- 7-20-85 TD of CWT's monitor well
- 10-9-85 EID questions CWT on MW sampling + emergency catchment
- 11-4-85 CWT (Lee Wilson) reply to EID's 10-9-85 request
- 11-13-85, 12-16-85  
4-2-86 CWT's submittal of "catchment system" plans
- 2-19-86 EID approves CWT plans for catchment system
- 5-18-87  
6-3-87 EID notifies CWT of deficiency in monitoring reports (10-86 to now)
- 12-2-87 EID inspection noting brine spills @ tanks, loading area well, pipeline
- 1-6-88 EID fines CWT \$972 for noncompliance (spills + not sampling MW)
- 3-15-88 CWT installs 2 new tanks (1 brine, 1 freshwater).
- 8-29-88 EID requires CWT to clean up brine contamination (from by MW)
- 9-19-88 6750 bbl spill of brine from tanks by randles
- 9-1-88 CWT submits material of facility "upgrade"
- 10-14/25-88 CWT response to spills, monitoring + upgrade
- 12-7-88 EID inspection - tom liner, spills, pump broke + leaking, monitor well contaminated
- 12-14-88 EID letter to CWT noting inspection deficiencies
- 12-16-89 OCD letter - notifies of transfer

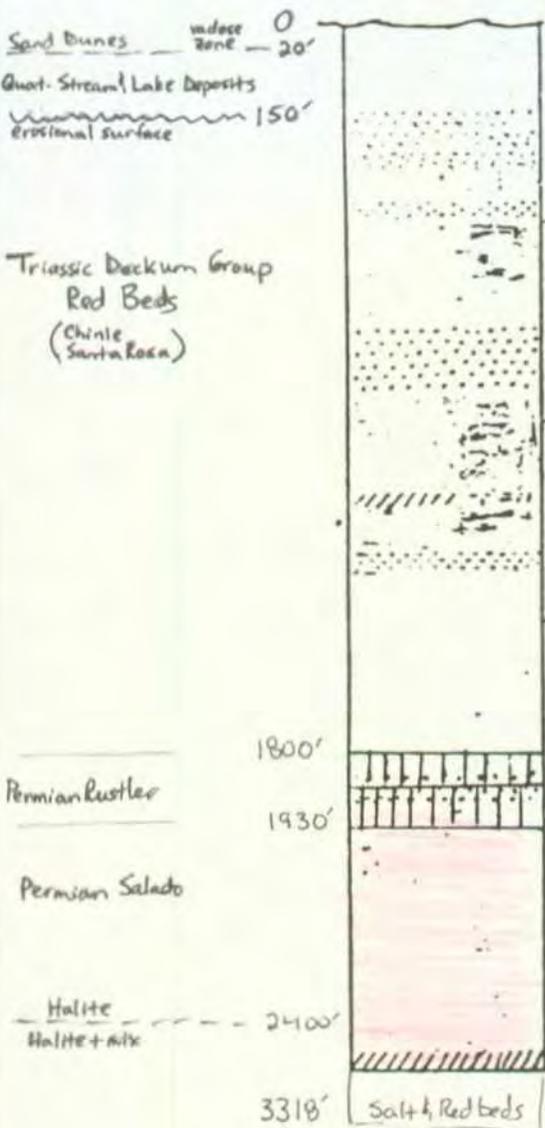
W Trainer - Sodium Prospect

Sec 25 19S 34E NMPM

Lea County, N.M.

KB 3746 ft.

Surface elev. 3735 ft.



Red beds and sand

Red beds and Eypsum sand

red beds Eypsum anhydrite

red beds sandy at base

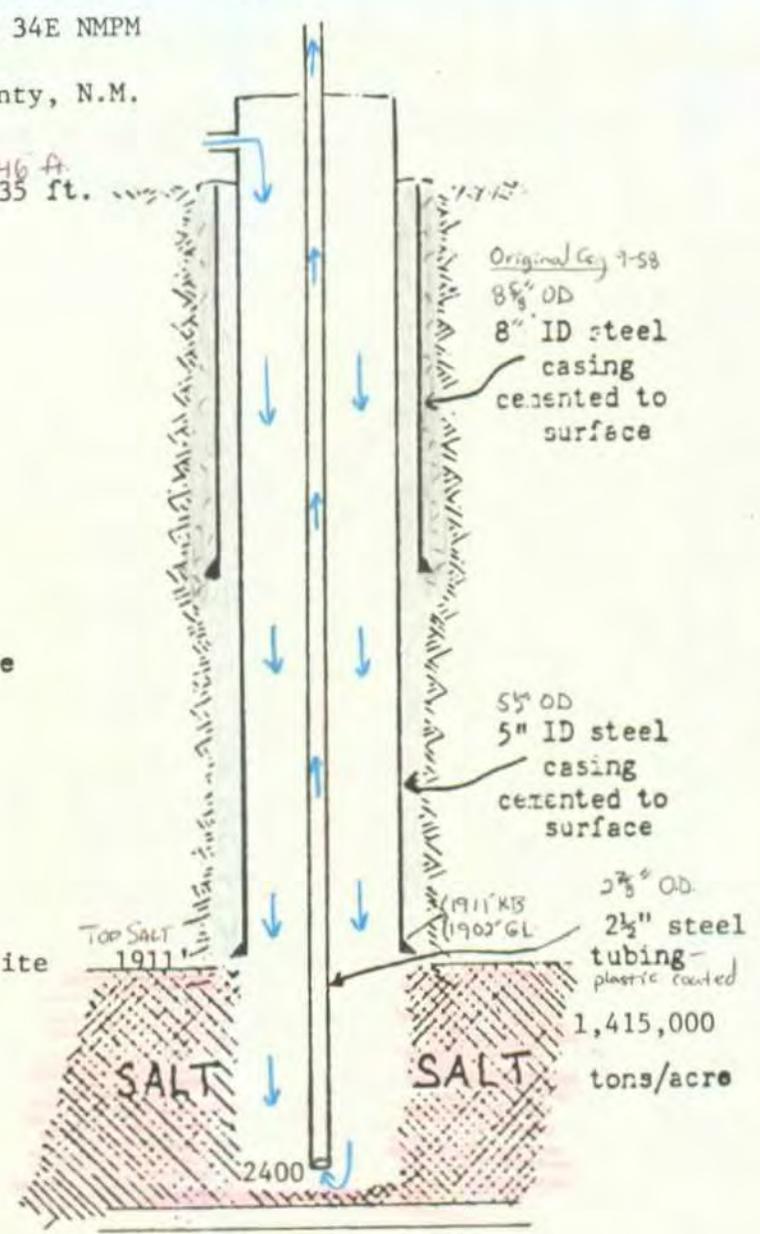
Rustler Anhydrite

Salt

2400' anhydrite

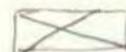
SALT

SALT



Vertical scale

None



Cement plug @ 3114' at deep water flowing ↑

Diagram of Shaft construction

ORIGINAL WELL

TD 9-15-58, 4100'  
Foster Drilling Co.  
Cabot Corp Federal #1  
P&A 3-61  
Cut 5 1/2" top @ 3382'

Length measured from top of RT 3746 ft

RE-ENTRY

7-15-81  
Set new 5 1/2" prod. csg. &  
2 7/8" tubing & cement plug (3114')

EXHIBIT A

**MARATHON ROAD WATER STATION  
MONITOR WELL SAMPLING RESULTS**

<u>DATE</u>	<u>CHLORIDES (mg/l)</u>	<u>TOTAL DISSOLVED SOLIDS (ml/l)</u>
08-19-85	900	6303
10-01-85 *	2113	7898
11-07-85	1400	9310
01-14-86	10,000	21,163
02-25-86 *	3555	9743
04-11-86	5100	11,778
07-03-86	11,000	N/A
04-23-87	6050	N/A
01-18-88	4500	9954
04-07-88	21,000	29,000
07-07-88	27,000	43,500
10-08-88	33,500	63,780
01-17-89 *	38,575	69,440
01-18-89	20,350	34,800
04-24-89	13,850	24,900
07-31-89	12,400	19,430
12-01-89 *	22,000	22,500

\* Samples taken and analyzed by either the EID or OCD.  
All remaining samples taken by C.W. Trainer and analyzed  
by Unichem International or Halliburton laboratories.

<u>DATE</u>	<u>Cl-</u>	<u>TDS</u>	<u>LOCAL</u>	<u>AGENCY/LAB</u>
5-18-84	192,000	321,083	brine pond	CWT/Unichem
12-1-89	157,000	287,000	brine pond	OCD/State
12-1-89	28	318	fresh pond	OCD/State
			(TD 8-20-85)	
8-19-85	900	6303	monitor well	CWT/Unichem
10-1-85	2113	7898		EID/State
11-7-85	1400	9310		CWT/Unichem
1-14-86	10,000	21,163		CWT/Unichem
2-25-86	3555	9743		EID/State
4-11-86	5100	11,778		CWT/Unichem
7-3-86	11,000	N/A		CWT/Halliburton
4-23-87	6050	N/A		" "
1-18-88	4500	9954		" "
4-7-88	21,000	29,000		" "
7-7-88	27,000	43,500		" "
*SPILL 10-8-88	33,500	63,780		" "
1-17-89	38,575	69,440		OCD/State
1-18-89	20,350	34,800		CWT/Halliburton
4-24-89	13,850	24,900		" "
7-31-89	12,400	19,430		" "
12-1-89	22,000	44,500		OCD/State
Water Well 29 5 mi NW	560	3680		



STATE OF NEW MEXICO

\$50,000 BLANKET PLUGGING BOND

BOND NO. CR 72864-03

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

KNOW ALL MEN BY THESE PRESENTS:

That C. W. TRAINER, (An individual), (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 COMMERCIAL UNION INSURANCE COMPANY, a corporation organized and existing under the laws of the State of Mass., 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 70-2-12, New Mexico Statutes Annotated, 1978 Compilation, as amended, in the sum of Fifty Thousand Dollars (\$50,000) 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 or brine mineral 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 or brine mineral leases on lands patented by the United States<sup>2</sup> 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 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 brine minerals, or carbon dioxide (CO<sub>2</sub>) gas leases, or helium gas leases or brine mineral leases, and on land patented by the United States<sup>2</sup> 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 hereto.

NOW, THEREFORE, If the above bounden principal and surety or either of them or their successors or assigns, or any of them, shall plug all of said wells when dry or when abandoned in accordance with the rules, regulations, and orders of the Oil Conservation Division of New Mexico in such way as to confine the oil, gas, brine 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.

PROVIDED, HOWEVER, That thirty (30) days after receipt by the Oil Conservation Division of New Mexico of written notice of cancellation from the surety, the obligation of the surety hereunder shall terminate as to property or wells acquired, drilled, or started after said thirty (30) day period but shall continue in effect, notwithstanding said notice, as to property or wells theretofore acquired, drilled or started.

KNOW under the law appointed. ar

C. W. TRAINER  
PRINCIPAL  
526 Sandy Mtn. Dr.  
Sunrise Beach, TX 78643

COMMERCIAL UNION INSURANCE COMPANY  
SURETY  
4415 Centerview Drive  
San Antonio, Texas 78284

By [Signature]  
Address  
Signature  
Owner  
Title

[Signature]  
Address  
Attorney-In-Fact  
Andrea H. Peck  
1615 Guadalupe, Austin, Tx. 78701

(Note: Principal, if corporation, affix corporate seal here.)

(Note: Corporate surety affix corporate seal here.)

ACKNOWLEDGEMENT FORM FOR NATURAL PERSONS

STATE OF Texas )  
COUNTY OF Bland ) ss.

On this 2nd day of April, 1990, before me personally appeared C. W. Trainer, to me known to be the person (persons) described in and who executed the foregoing instrument and acknowledged that he (they) executed the same as his (their) free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on the day and year in this certificate first above written.

[Signature]  
Notary Public

3-17-94  
My Commission Expires

ACKNOWLEDGEMENT FORM FOR CORPORATION

STATE OF \_\_\_\_\_ )  
COUNTY OF \_\_\_\_\_ ) ss.

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally appeared \_\_\_\_\_, to me personally known who, being by me duly sworn, did say that he is \_\_\_\_\_ of \_\_\_\_\_ and that the foregoing instrument was signed and sealed on behalf of said corporation by authority of its board of directors, and acknowledged said instrument to be the free act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on the day and year in this certificate first above written.

\_\_\_\_\_  
Notary Public

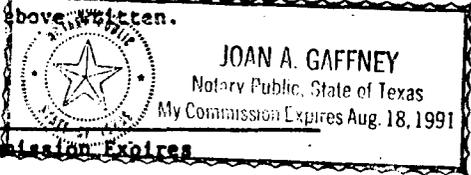
My Commission Expires

ACKNOWLEDGEMENT FORM FOR CORPORATE SURETY

STATE OF TEXAS )  
COUNTY OF TRAVIS ) ss.

On this 28th day of March, 1990, before me appeared Andrea H. Peck, to me personally known, who, being by me duly sworn, did say that she is Attorney-In-Fact of Commercial Union Insurance Company and that the foregoing instrument was signed and sealed on behalf of said corporation by authority of its board of directors, and acknowledged said instrument to be the free act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on the day and year in this certificate first above written.

  
JOAN A. GAFFNEY  
Notary Public, State of Texas  
My Commission Expires Aug. 18, 1991

[Signature]  
Notary Public

My Commission Expires

(Note: Corporate surety attach power of attorney.)

APPROVED BY:

OIL CONSERVATION DIVISION OF NEW MEXICO

By: [Signature]  
Date: \_\_\_\_\_

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that the COMMERCIAL UNION INSURANCE COMPANY, a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, and having its principal office in the City of Boston, Massachusetts, hath made, constituted and appointed, and does by these presents make and constitute and appoint GEORGE M. BERRY, NORA H. HARGIS, WILLIAM GAMMON, III and ANDREA H. PECK all of Austin, Texas

and each of them its true and lawful Attorney-in-Fact, to make, execute, seal and deliver for and on its behalf as surety any and all bonds or undertakings

and the execution of such bonds or undertakings in pursuance of these presents, shall be binding upon said Company as fully and amply, to all intents and purposes, as if such bonds were signed by the President, sealed with the corporate seal of the Company, and duly attested by its Secretary, hereby ratifying and confirming all the acts of said Attorney-in-Fact pursuant to the power herein given. This Power of Attorney is made and executed pursuant to and by authority of the following resolutions adopted by the Board of Directors of the COMMERCIAL UNION INSURANCE COMPANY at a meeting duly called and held on the twenty-seventh day of July, 1972:

Resolved: That the President, or any Vice-President, or any Assistant Vice-President, may execute for and in behalf of the company any and all bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, the same to be attested when necessary and the seal of the company affixed thereto by the Secretary, or any Assistant Secretary; and that the President, or any Vice-President, or Assistant Vice-President, may appoint and authorize an Attorney-in-Fact to execute on behalf of the company any and all such instruments and to affix the seal of the company thereto; and that the President, or any Vice-President, or any Assistant Vice-President, may at any time remove, any such Attorney-in-Fact and revoke all power and authority given to any such Attorney-in-Fact.

Resolved: That Attorneys-in-Fact may be given full power and authority to execute for and in the name and on behalf of the company any and all bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, and any such instrument executed by any such Attorney-in-Fact shall be as binding upon the company as if signed by the President and sealed and attested by the Secretary, and, further, Attorneys-in-Fact are hereby authorized to verify any affidavit required to be attached to bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, and are also authorized and empowered to certify to a copy of any of the by-laws of the company as well as any resolution of the Directors having to do with the execution of bonds, recognizances, contracts of indemnity, and all other writings obligatory in the nature thereof, and to certify copies of the Power of Attorney or with regard to the powers of any of the officers of the company or of Attorneys-in-Fact.

This power of attorney is signed and sealed by facsimile under the authority of the following Resolution adopted by the Directors of the COMMERCIAL UNION INSURANCE COMPANY at a meeting duly called and held on the twenty-seventh day of July, 1972:

"Resolved: That the signature of the President, or any Vice-President, or any Assistant Vice-President, and the signature of the Secretary or any Assistant Secretary and the Company Seal may be affixed by facsimile to any power of attorney or to any certificate relating thereto appointing Attorneys-in-Fact for purposes only of executing and attesting any bond, undertaking, recognizance or other written obligation in the nature thereof, and any such signature and seal where so used, being hereby adopted by the company as the original signature of such officer and the original seal of the company, to be valid and binding upon the company with the same force and effect as though manually affixed."

IN WITNESS WHEREOF, the COMMERCIAL UNION INSURANCE COMPANY, has caused these presents to be signed by its Assistant Vice-President and its corporate seal to be hereto affixed, duly attested by its Secretary on this eighth day of March 19 90



Dennis R. Smith

Attest: Dennis R. Smith — Secretary

COMMERCIAL UNION INSURANCE COMPANY Robert J. Spencer

By Robert J. Spencer — Assistant Vice-President

COMMONWEALTH OF MASSACHUSETTS COUNTY OF SUFFOLK SS.

On this eighth day of March 1990, before me personally came Robert J. Spencer, Assistant Vice-President, and Dennis R. Smith, Secretary of the COMMERCIAL UNION INSURANCE COMPANY, to me personally known to be the individuals and officers described in and who executed the preceding instrument, and they acknowledged the execution of the same, and being by me duly sworn, severally and each for himself depose and sayeth, that they are the said officers of the Company aforesaid, and that the seal affixed to the preceding instrument is the corporate seal of said Company and that the said corporate seal and their signatures as such officers were duly affixed and subscribed to the said instrument by the authority and direction of the said Company.



Edward W. Shay Edward W. Shay — Notary Public (My Commission expires August 10, 1990)

CERTIFICATE

I, the undersigned, Assistant Secretary of the COMMERCIAL UNION INSURANCE COMPANY, a Massachusetts Corporation, do hereby certify that the foregoing power of attorney is in full force and has not been revoked; and furthermore, that the Resolutions of the Board of Directors set forth in the power of attorney are now in force.

Signed and sealed at the City of Boston. Dated this 6 day of December 19 89



Joan K. Geddes Joan K. Geddes — Assistant Secretary