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352

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**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2001 - 1999

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*Hobbs Operating Unit*

**Texaco Exploration and Production Inc.**  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: October 30, 2001

Oil conservation Division  
1625 French Drive  
Hobbs, New Mexico 88240  
Attn: Paul Sheeley

Re: Vacuum Glorieta West Unit # 126 and 127.

Dear Mr. Sheeley:

The remediation projects for the sites mentioned above are complete. As mentioned in the work plans the oily soil was removed to the Texaco landfarm and replaced with clean topsoil. The attached analysis shows TPH and Chlorides below NMOCD requirements for the groundwater depth of 89 ft.

If you have any questions please call me at 915-688-2971.

Sincerely;

Rodney Bailey  
ChevronTexaco

---

Texaco  
Spills

Copy: Roger Anderson  
Chris Williams  
Bill Olsen



**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
P.O. BOX 3109  
MIDLAND, TX 79702  
FAX TO:

Receiving Date: 10/25/01  
Reporting Date: 10/26/01  
Project Number: NOT GIVEN  
Project Name: VACUUM GLORIETTA UNIT #126  
Project Location: NOT GIVEN

Sampling Date: 10/25/01  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC/AH

LAB NUMBER SAMPLE ID	GRO	DRO	CI*
	(C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	(>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	(mg/Kg)
ANALYSIS DATE	10/25/01	10/25/01	10/26/01
H6241-1 B.H. COMPOSITE #1	<50	230	240
Quality Control	770	776	970
True Value QC	800	800	1000
% Recovery	96.3	96.4	97.0
Relative Percent Difference	8.3	7.8	4.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; CI: Std. Methods 4500-CI'B

\*Analyses performed on 1:4 w:v aqueous extracts.

*Bryant A. Cozart*  
\_\_\_\_\_  
Chemist

10/26/01  
\_\_\_\_\_  
Date

H6241.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.





**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
P.O. BOX 3109  
MIDLAND, TX 79702  
FAX TO:

Receiving Date: 10/23/01  
Reporting Date: 10/24/01  
Project Number: NOT GIVEN  
Project Name: W.V.G.U. #127  
Project Location: BUCKEYE, NM

Sampling Date: 10/23/01  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		10/23/01	10/23/01	10/24/01
H6232-1	EAST COMPOSITE	<50	<50	80
H6232-2	WEST COMPOSITE	<50	<50	96
Quality Control		736	796	970
True Value QC		800	800	1000
% Recovery		92.1	99.5	97.0
Relative Percent Difference		4.2	1.8	4.0

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB  
\*Analyses performed on 1:4 w:v aqueous extracts.

Burgess JH Cooke  
Chemist

10/24/01  
Date

**H6232.XLS**

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.





*Hobbs Operating Unit*

**Texaco Exploration and Production Inc.**  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: October 15, 2001

RECEIVED

OCT 17 2001

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Oil conservation Division  
1625 French Drive  
Hobbs New Mexico 88240  
Attn: Paul Sheeley

Re: Oil and Water Spill Near Vacuum Glorieta West Unit # 127  
East and West Shoulder of Highway 8

Dear Mr. Sheeley

The leak mentioned above is on Vacuum Glorieta West Unit # 126, where the line passes under the highway. Release on this spill was 2 bbls oil and 2 bbls water, not requiring a C-141. This happened the next day after the leak at Vacuum Glorieta West Unit #126, on location. This is the same line. In response to your letter dated October 10, 2001 requesting a remediation plan, the C-141 sent in dated 9-24-01, states the remediation plan for the leaks on this line. Attached is another copy of the C-141.

If you have any questions please call me at 915-688-2971.

Sincerely;

Rodney Bailey  
Chevron Texaco  
Hobbs Operating Unit

Copies: Roger Anderson-Environmental Bureau Chief  
Chris Williams- District I Supervisor  
Bill Olsen- OCD Hydrologist

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>Texaco E&amp;P Inc.</i>		Contact <i>Rodney Bailey</i>
Address <i>500 N. Lorraine Midland TX</i>		Telephone No. <i>915-688-2971</i>
Facility Name <i>Vacuum Clarieta West Unit #126</i>		Facility Type <i>Producing well</i>
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>E</i>	<i>6</i>	<i>18S</i>	<i>35E</i>					<i>Lea</i>

NATURE OF RELEASE

Type of Release <i>Crude Oil &amp; Produce Water</i>	Volume of Release <i>2 oil 18 water</i>	Volume Recovered <i>5 water</i>
Source of Release <i>Flowline</i>	Date and Hour of Occurrence <i>9-11-01</i>	Date and Hour of Discovery <i>9-11-01</i>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
*Dirty soil will be removed to Texaco landfarm. horizontal & vertical extent will be determined for BTEX, TPH & Chlorides-*

Describe Area Affected and Cleanup Action Taken.\*  
*Affected Area 20,000 sq. ft. Groundwater Average 89 ft.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Rodney Bailey</i>	<u>OIL CONSERVATION DIVISION</u>	
Printed Name:	Approved by District Supervisor:	
Title: <i>SHA E Professional</i>	Approval Date:	Expiration Date:
Date: <i>9-24-01</i> Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

- (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
- (b) an unauthorized release of any volume which:
  - (i) results in a fire;
  - (ii) will reach a water course;
  - (iii) may with reasonable probability endanger public health; or
  - (iv) results in substantial damage to property or the environment;
- (c) an unauthorized release of natural gases in excess of 500 mcf; or
- (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73 . 2-1-96; A, 3-15-97]

(2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A. 19). [3-15-97]



*Hobbs Operating Unit*

Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: October 30, 2001

Oil conservation Division  
1625 French Drive  
Hobbs, New Mexico 88240  
Attn: Paul Sheeley

Re: Vacuum Grayburg San Andres Unit Inj. Header #1

Dear Mr. Sheeley:

As stated in the C-141 for the above location, the horizontal and vertical extend were determined. As mentioned in the C-141 the horizontal extent is 57,600 sq. ft. The vertical extend was determined, by digging in the center of the spill area to a depth of 9 ft., with the analysis showing 272 mg/kg .

If you have any questions please call me at 915-688-2971.

Sincerely;

Rodney Bailey  
ChevronTexaco

Copy: Roger Anderson  
Chris Williams  
Bill Olsen



# ARDINAL LABORATORIES

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

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

ANALYTICAL RESULTS FOR  
CHEVRON-TEXACO, INC.  
ATTN: RODNEY BAILEY  
P.O. BOX 3109  
MIDLAND, TX 79702  
FAX TO:

Receiving Date: 10/15/01  
Reporting Date: 10/16/01  
Project Number: NOT GIVEN  
Project Name: VGSAU (INJ. HEADER #1)  
Project Location: BUCKEYE, NM

Analysis Date: 10/15/01  
Sampling Date: NOT GIVEN  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: HM  
Analyzed By: HM

LAB NUMBER	SAMPLE ID	Cl <sup>-</sup> (mg/Kg)
H6211-1	#1 BOTTOM COMPOSITE	272
Quality Control		1010
True Value QC		1000
% Recovery		101
Relative Percent Difference		1.0
METHOD: Std. Methods		4500-Cl <sup>-</sup> B

NOTE: Analyses performed on 1:4 w:v aqueous extracts.

Amy Hill  
Chemist

10-16-01  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.





Hobbs Operating Unit

Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: September 26, 2001

Oil Conservation Division  
1625 French Drive  
Hobbs New Mexico, 88240  
Attn: Paul Sheeley

Re: Pipeline Leak West of Central Vacuum Unit, UL-B, Sec. 36 17S R 34E  
South of Central Tank Battery#1, UL-D, Sec. 25 T17S, R34E

Dear Mr. Sheeley:

The leak addressed in the letter dated September 17, 2001, about the above referenced site, is not a Texaco leak. This line belongs to EOTT and they will need to be addressed about clean-up procedures. In the future when you or any Oil conservation representative visits a Texaco site to look at a leak where a C-141 has or has not been received will call me, we will be glad to meet you on site. This will help you determine correct company responsibility.

If additional information is needed, please call me at 915-688-2971.

Sincerely,

Rodney Bailey

Texaco

SH&E Professional

Cc: Roger Anderson  
Chris Williams  
Bill Olsen



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

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

September 17, 2001

Texaco E & P Inc.  
Attn: Rodney Bailey  
500 N. Loraine  
Midland, Texas 79702

**USPS Certified Mail**  
**Return Receipt #7099 3220 0002 3948 4080**

Re: Pipeline Leak west of Central Vacuum Unit, UL-B, Sec. 36 T17S-R34E.  
South of Central Tank Battery #1, UL-D, Sec. 25 T17S-R34E

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (OCD) inspected a release of oil from a pipeline near the above referenced sites on September 12, 2001. There is free standing oil in the trench. Please see enclosed photos.

**Texaco E & P Inc., must submit a remediation plan by October 12, 2001 that includes the following:**

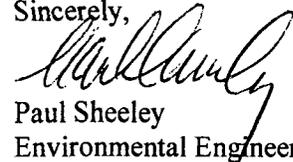
1. Texaco E & P Inc., shall perform delineation of the vertical and horizontal extent of BTEX, TPH and chloride contamination in the soil.
2. Texaco E & P Inc., shall notify the OCD at least 48 hours in advance of any sampling event.

For guidance in this matter see Guidelines for Remediation of Leaks, Spills and Releases, August 13, 1993, on the OCD website:

[www.emnrd.state.nm.us/ocd/bureaus/environmental/review/spill1.doc](http://www.emnrd.state.nm.us/ocd/bureaus/environmental/review/spill1.doc)

If you have any questions please contact me, (505) 393-6161, x113.

Sincerely,



Paul Sheeley  
Environmental Engineer

cc: Roger Anderson-Environmental Bureau Chief  
Chris Williams-District I Supervisor  
Bill Olson- OCD Hydrologist



Hobbs Operating Unit

Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: October 15, 2001

RECEIVED

OCT 17 2001

Oil conservation Division  
1625 French Drive  
Hobbs New Mexico, 88231  
Attn: Paul Sheeley

ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

Re: Vacuum Grayburg San Andres Unit ( North) Injection Station #1

Dear Mr. Sheeley;

In response to your letter dated October 10, 2001, the remediation plan for the above mentioned site was stated on the C-141, dated 9-24-01. Attached is another copy of the C-141.

If you have any questions please call me at 915-688-2971.

Sincerely;

*Rodney Bailey*

Rodney Bailey  
Chevron Texaco  
Hobbs Operating Unit

Copy: Roger Anderson-Environmental Bureau Chief  
Chris Williams-District I Supervisor  
Bill Olsen-OCD Hydrologist

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO E&amp;P INC</i>		Contact <i>Rodney Bailey</i>
Address <i>500 N. LORRAINE Midland Tx 79705</i>		Telephone No. <i>915-688-2971</i>
Facility Name <i>VACUUM GRAYBURG SAN ANTONIO</i>		Facility Type <i>Satellite #1</i>
Surface Owner	Mineral Owner	Lease No.

#### LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>C</i>	<i>2</i>	<i>18S</i>	<i>34E</i>					<i>LEA</i>

#### NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>600 bbls</i>	Volume Recovered <i>550 bbls</i>
Source of Release <i>Flowline</i>	Date and Hour of Occurrence <i>9-13-01</i>	Date and Hour of Discovery <i>9-13-01</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>P. Pam Hunt</i>	Date and Hour <i>9-13-01</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
*Vertical and Horizontal extent will be determined for chlorides - Results will be sent to NMOCD.*

Describe Area Affected and Cleanup Action Taken.\*  
*Affected Area 57,600 sq ft. Groundwater 102 ft -*

I hereby certify that the information given above is true and complete to the best of my knowledge and understanding that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Rodney Bailey</i>		<u>OIL CONSERVATION DIVISION</u>	
Printed Name:		Approved by District Supervisor:	
Title: <i>SH&amp;E Professional</i>		Approval Date:	Expiration Date:
Date: <i>9-24-01</i>	Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

- (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
- (b) an unauthorized release of any volume which:
  - (i) results in a fire;
  - (ii) will reach a water course;
  - (iii) may with reasonable probability endanger public health; or
  - (iv) results in substantial damage to property or the environment;
- (c) an unauthorized release of natural gases in excess of 500 mcf; or
- (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73 . 2-1-96; A, 3-15-97]

(2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A. 19). [3-15-97]



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

## Memo

**To:** Roger Anderson, Bill Olson, & Chris Williams

**From:** Donna Williams

**CC:**

**Date:** 06/28/00

**Re:** Please Review

Roger and Others,

I have made everyone listed above a copy of two of Texaco's files for your review. Also I sent a letter to you – a draft letter – concerning these two sites. I became aware of these previous spills in the same locations upon filing the correspondences. Here is what we have:

UL E-Sec 31-T18S-R35E:

- ◆ On 9-15-99 Texaco had a release of 600 bbls of Produced Water – Recovered 560 bbls.
- ◆ On 11-17-99 The District Office sent a letter asking for a corrective action plan and /or remediation plan. (Asking them to Please include Chlorides).
- ◆ On 11-29-99 Texaco sent a letter back indicating they didn't have to comply.
- ◆ On 12-16-99 (Chris's) N.O.V. to Texaco went out to Texaco.
- ◆ On 02-26-2000 Texaco replied – Chlorides are at levels 4920 ppm on 2-14-00 and depth to ground water levels show to range from 58' – 95'.
- ◆ Once again no depths with this.

UL C-Sec 2-T18S-R34E:

- ◆ On 9-16-99 Texaco had a release of 100 bbls of Produced Water – Recovered 80 bbls.
- ◆ The 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup>, bullets above apply here as well.
- ◆ On 02-26-00 Texaco replied – Chlorides are at levels 3600 ppm on 2-14-00 and depth to ground water is 102'.
- ◆ Once again no depths with this.

Donna



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 28, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
P.O. Box 3109  
Midland, Texas 79701

**\*THIS HAS NOT BEEN SENT**

Re: Produced Water Spills Vertical Extent-  
-Report dated June 23, 2000  
UL C-Sec 2-T18S-R34E  
Vacuum Grayburg San Andres Unit

**YET WAITING S.F.'S APPROVAL**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the Produced Water Spills Vertical Extent Report dated June 23, 2000. A proper evaluation can not be made due to the lack of information. **Therefore, The NMOCD hereby requires the following by July 12<sup>th</sup>, 2000:**

1. Texaco shall state, if any, the remediation provided for the contamination on the affected area(s).
2. Texaco shall state all work performed on the above referenced location to date and provide all documentation for verification.
3. Texaco shall provide to the NMOCD a map of the affected area(s) with the sample point(s) plotted on the map. Providing with the map sample depths of each sample taken.

If Texaco performs any future sampling, at any location, Texaco shall notify The NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and split samples.

If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 25, 2000  
UL C-Sec 2-T18S-R34E  
Vacuum Grayburg San Andres Unit

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

*Donna Williams*

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO G &amp; P INC.</i>		Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>		Telephone No. <i>505-397-0422</i>	
Facility Name <i>Vacuum Grayburg San Andres Unit</i>		Facility Type <i>Water Station</i>	
Surface Owner	Mineral Owner	Lease No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>C</i>	<i>2</i>	<i>185</i>	<i>34E</i>					<i>Lea</i>

*~ 98-135'*

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>75 bbls</i>	Volume Recovered <i>50 bbls</i>
Source of Release <i>Bypass Line on Pumps</i>	Date and Hour of Occurrence <i>2-22-00</i>	Date and Hour of Discovery <i>2-22-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>George</i>	Date and Hour <i>2-22-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Improper Alignment & Vibration - Free Liquid Removed - Area Filled -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 10000 sq. Ft. Ground Water Around 140 Ft*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	
Date: <i>2-25-00</i> Phone:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*AP*



**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 05/16/00  
Reporting Date: 05/18/00  
Project Number: NOT GIVEN  
Project Name: VAC. GRAYBURG SAN ANDRES UNIT  
WATER STATION  
Project Location: NOT GIVEN

Sampling Date: NOT GIVEN  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		05/16/00	05/16/00	05/17/00
H4880-1	-	<50	<50	144
Quality Control		974	980	1020
True Value QC		1000	1000	1000
% Recovery		97.4	98.0	102
Relative Percent Difference		13.5	7.2	8.8

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

\*Analysis performed on a 1:4 w:v aqueous extract.

*Burgess for Coche*  
Chemist

5/18/00  
Date

H4880A.XLS  
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 05/16/00  
Reporting Date: 05/18/00  
Project Number: NOT GIVEN  
Project Name: VAC. GRAYBURG SAN ANDRES UNIT  
WATER STATION  
Project Location: NOT GIVEN

Sampling Date: NOT GIVEN  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		05/16/00	05/16/00	05/16/00	05/16/00
H4880-1	-	<0.005	<0.005	<0.005	<0.015
Quality Control		0.087	0.094	0.090	0.270
True Value QC		0.100	0.100	0.100	0.300
% Recovery		87.1	93.8	90.4	90.0
Relative Percent Difference		1.7	3.7	1.4	0.1

METHOD: EPA SW-846 8260

*Burgess J. Cooke*  
Chemist

5/18/00  
Date

**H4880B.XLS**  
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



*Hobbs Operating Unit*

Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: 6-23-00

Oil Conservation Division  
Attn: Donna Williams  
1625 N. French Drive  
Hobbs, NM 88240

Re: Produce Water Spills Vertical Extent

In response to the letters sent by the NMOCD, addressing produce water spills at the Buckeye FMT, Texaco conducted a survey to determine the vertical extent of different volumes of produce water. The native soil in the Buckeye area is about 6" to 1ft. Topsoil then caliche, with groundwater ranging from 72ft to over 150ft. The results are stated below:

1. On 2-23-00, a vehicle hit the piping coming from West Vacuum Unit # 58 releasing 320 bbls of produce water. Free liquid, 320 bbls, was removed by vacuum truck. The area affected was about 25,000-sq. ft. Samples were taken at a depth of 1 ft. show the TPH, GRO and the DRO less than 50 mg/kg, BTEX less than .005mg/kg and the chlorides at 11,800 mg/kg. Additional analysis at 2ft. show the chlorides to be 6160mg/kg.
2. On 2-15-00, a fiberglass line parted releasing 450bbls of produce water at the Central Vacuum Unit. Free liquid, 400bbls, was removed by vacuum truck. The area affected was around 5000 sq. ft. Samples taken at a depth of 4ft. show TPH, GRO less than 50mg/kg and DRO 57.5mg/kg, BTEX less than .005mg/kg and chlorides 144mg/kg.
3. On 1-28-00 internal corrosion on an old steel produce water flowline at the Vacuum Grayburg San Andres Unit # 15, caused a spill of 90 bbls. Free liquid, 80 bbls, was removed by vacuum truck. The area affected was about 1800sq. ft.. Samples taken at a depth of 2 ft. show TPH, GRO less than 50mg/kg and DRO 282mg/kg, BTEX less than .005mg/kg and chlorides 176mg/kg.
4. On 3-21-00 a transition piece where the poly line converts to steel line at the Central Vacuum Unit # 77, parted releasing 10 bbls of oil and 75 bbls of produce water on the location. Free liquid, 5 bbls oil and 60 bbls water, was removed by vacuum truck. The affected area was about 10,850 sq. ft. Samples taken at a depth of 2ft. show, GRO less than 50mg/kg and DRO 66mg/kg, BTEX less than .005mg/kg and chlorides 112mg/kg.

5. On 2-22-00 a by pass line on the circulating pump at the Vacuum Grayburg San Andres Unit water Station, parted releasing 75 bbls of produce water. Free liquid, 50 bbls, was removed by vacuum truck. The area affected was about 10,000 sq. ft. Samples were taken at a depth of 2ft. showing, GRO less than 50mg/kg and DRO less than 50mg/kg, BTEX less than .005mg/kg and chlorides 144 mg/kg.
6. On 1-30-00 a pump locked down at the Abo Consolidated Battery causing the storage tanks to overflow. 55 bbls of produce water was released on location. Free liquid, 50 bbls, was removed by vacuum truck. The area affected was 500sq. ft. Samples were taken at 18 inches showing, GRO less than 50mg/kg and DRO 777mg/kg, BTEX less than .005mg/kg and chlorides 160 mg/kg.

The examples above show the mg/kg reduced drastically in produce water spills from 1ft. to 4ft. Soils in this area keep migration of chlorides to a minimum.

Texaco would like to submit this report to the NMOCD as documentation for all produce water spills at the Buckeye FMT showing the depths different volumes will travel. As always the NMOCD form "C-141" will be filled out and sent in for each release but a chloride vertical extent will not be required.

If you have any questions please call me at 915-688-2971.

Sincerely



Rodney Bailey  
Texaco  
Hobbs Operating Unit



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191

Date: February 26, 2000

Ms. Donna Williams  
New Mexico Oil Conservation Division

*NOV*  
*L-6-18-35*  
*C-2-18-34 135*  
*E-31-18-35-72'*

Re: ✓ C-141; Sec12; T20S; R37E;  
      ✗ C-141; Sec31; T17S; R35E;  
      C-141; Sec 1; T18S; R34E;

*8*  
*95*  
*12/24*  
*(2)*

Dear Ms. Williams

As requested in our meeting on February 1<sup>st</sup>, attached are the analysis for the above mentioned sites. Chlorides test were conducted on each site and TPH on the Jal water system. As the reports show the TPH on the Jal water system site is well below NMOCD guidelines with groundwater around 145ft.

As discussed in our meeting, with Texaco providing this information on these sites, this answers the Notice of Violation letter send by Chris Williams dated December 16, 1999. I feel Texaco is going above and beyond the guidelines providing the NMOCD with these chloride analyses, showing a Texaco priority is to protect the environment. As talked about in our meeting and conservation's with other company representatives, some companies are not providing the NMOCD with this information and have stated to me they will not until it becomes a requirement. The NMOCD should strive to keep the playing field level for all companies.

If you have any questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
Hobbs Operating Unit

*[Faint, illegible text at the bottom of the page]*



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

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

ANALYTICAL RESULTS FOR  
 TEXACO E&P  
 ATTN: RODNEY BAILEY  
 205 E. BENDER  
 HOBBS, NM 88240  
 FAX TO:

Receiving Date: 02/14/00  
 Reporting Date: 02/16/00  
 Project Number: NOT GIVEN  
 Project Name: NOT GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 02/14/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: BC  
 Analyzed By: BC

*Gasoline Range Organics*  
 GRO  
 (C<sub>6</sub>-C<sub>10</sub>)  
 (mg/Kg)

*Diesel Range Organics*  
 DRO  
 (>C<sub>10</sub>-C<sub>28</sub>)  
 (mg/Kg)

LAB NUMBER SAMPLE ID

LAB NUMBER	SAMPLE ID	GRO (mg/Kg)	DRO (mg/Kg)
	ANALYSIS DATE:	02/15/00	02/15/00
H4645-2	JAL WATER SYSTEM	59.4	1840
	Quality Control	576	613
	True Value QC	600	600
	% Recovery	96.0	102
	Relative Percent Difference	4.0	1.1

METHOD: SW-846 8015 M

*Burjett P. Cook*  
 Chemist

2/16/00  
 Date

H4645B.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

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

**ANALYTICAL RESULTS FOR**  
**TEXACO E&P**  
**ATTN: RODNEY BAILEY**  
**205 E. BENDER**  
**HOBBS, NM 88240**  
**FAX TO:**

Receiving Date: 02/14/00  
 Reporting Date: 02/16/00  
 Project Number: NOT GIVEN  
 Project Name: NOT GIVEN  
 Project Location: NOT GIVEN

Analysis Date: 02/15/00  
 Sampling Date: 02/14/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: BC  
 Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl <sup>-</sup> (mg/Kg)
H4645-1	CENTRAL VAC. UNIT	4920
H4645-2	JAL WATER SYSTEM	96
H4645-3	GREYBURG SAN ANDRES	3600
	#5	
Quality Control		910
True Value QC		1000
% Recovery		91
Relative Percent Difference		1.4

**METHOD: Standard Methods**      **4500-ClB**

Analyses performed on 1:4 w:v aqueous extracts.

*Benjamin P. Coker*  
 Chemist

2/16/00  
 Date

H4645A.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

STATE OF NEW MEXICO

---

FACSIMILE TRANSMITTAL SHEET

---

TO:  
ROGER ANDERSON

FROM:  
DONNA WILLIAMS

FAX NUMBER:  
827-8177

DATE:  
3-28-00

COMPANY:  
OCD-ENVIRONMENTAL  
BUREAU

TOTAL NO. OF PAGES INCLUDING  
COVER:  
4

PHONE NUMBER:

SENDER'S REFERENCE NUMBER:

RE:  
TEXACO

YOUR REFERENCE NUMBER:  
505-393-6161 EXT...113

URGENT

FOR REVIEW

PLEASE COMMENT

PLEASE REPLY

PLEASE RECYCLE

---

NOTES/COMMENTS:

Roger,

This is in reference to the email I had just sent to you. You may want this as a reference. Call me.

IF YOU HAVE ANY QUESTIONS PLEASE DON'T HESITATE TO CALL (505)- 393-6161 EXT...113

DONNA WILLIAMS





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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1999, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

December 16, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z 402 902 626**

Mr. Rodney Bailey  
Texaco Exploration & Production  
205 E Bender  
Hobbs, New Mexico 88240

**Subject:        NOTICE OF VIOLATION**

Re:        C-141; September 22,1999: UL E, Sec 6, T18S, R35E  
          C-141; September 22,1999: UL C, Sec 2, T18S, R34E  
          C-141; October 5,1999: UL E, Sec 31, T18S, R35E

Dear Mr. Bailey:

By letters dated November 17, 1999, Texaco Exploration & Production Company (Texaco) was required to submit corrective action plans and/or remediation plans to the New Mexico Oil Conservation Division (OCD) for the above referenced sites. Texaco's letter dated November 29, 1999 acknowledges receipt of the OCD requirement and declines to submit the required plans.

Pursuant to 19 NMAC 15.C.116.D "CORRECTIVE ACTION: The responsible person must complete Division approved corrective actions for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 ....."  
Texaco is in violation of 19 NMAC 15.C.116.D for failure to submit the remediation plans for OCD approval.

**Texaco must submit for OCD approval detailed corrective action or remediation plans addressing the spills at the above referenced locations by December 31, 1999. Failure to respond to this Notice of Violation will result in further enforcement action.**

If you have any questions or comments, please contact me at (505) 393-6161 ext-102

Sincerely,

Chris Williams  
District Supervisor

cc:        Lori Wrotenbery, Director  
          Rand Carroll, Legal Counsel



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

November 17, 1999

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on September 22, 1999  
UL C-Sec 2-Ts18S-R34E

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **Please submit to NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days from receipt of this letter.** Please include Chlorides in the sampling activities. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 111 South First  
 Mesita, NM 88210  
 District III (505) 334 - 6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C-141  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Vacuum Grayburg San Andres Unit</b>		Facility Type <b>Satellite # 4</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Init Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	2	18S	34E					Lea

**NATURE OF RELEASE**

Type of Release <b>Produce Water</b>	Volume of Release <b>100 bbls</b>	Volume Recovered <b>80 bbls</b>
Source of Release <b>Produce Water Flow line</b>	Date and Hour of Occurrence <b>9-16-99</b>	Date and Hour of Discovery <b>9-16-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>9-9-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

**External Corrosion. Free liquid was removed. No other action taken.**

Describe Area Affected and Cleanup Action Taken. \*

**Affected area 4000 sq. ft. Ground water around 140 ft.**

**Texaco request closure on this site.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief. Signature: <i>Rodney Bailey</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Rodney Bailey</b>		Approved by District Supervisor	
Title: <b>EHS Professional</b>		Approval Date:	Expiration Date
Date: <b>9-22-99</b>	Phone: <b>397-0422</b>	Conditions of Approval:	
		Attached <input type="checkbox"/>	



Texaco Exploration and Production Inc

P O Box 1929  
Eunice NM 88231 1929

Date: November 29, 1999

Oil Conservation Division  
Attn: Donna Williams  
1625 N. French Drive  
Hobbs, NM 88240

Re: C141 Submitted:  
UL C-Sec 2-Ts18S-R34E  
UL E-Sec 31-Ts18S-R35E  
UL E-Sec 6-Ts18S-R35E

Dear Ms. Williams:

In response to your letter dated November 17, 1999 addressing the above mentioned C141 reports. I can find no indication in the guidelines that an operator is required to submit a corrective action plan and/or a remediation plan for produce water spills, unless there has been an impact to surface or ground water. As a result, Texaco does not feel the NMOCD is authorized to request such a plan.

If you have additional questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
EH&S Coordinator



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 28, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
P.O. Box 3109  
Midland, Texas 79701

**\*THIS HAS NOT BEEN SENT**

Re: Produced Water Spills Vertical Extent-  
-Report dated June 23, 2000  
UL E-Sec 31-T18S-R35E  
Central Vacuum Unit (WIS)

**YET WAITING S.F.'S APPROVAL**

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the Produced Water Spills Vertical Extent Report dated June 23, 2000. A proper evaluation can not be made due to the lack of information. **Therefore, The NMOCD hereby requires the following by July 12<sup>th</sup>, 2000:**

1. Texaco shall state, if any, the remediation provided for the contamination on the affected area(s).
2. Texaco shall state all work performed on the above referenced location to date and provide all documentation for verification.
3. Texaco shall provide to the NMOCD a map of the affected area(s) with the sample point(s) plotted on the map. Providing with the map sample depths of each sample taken.

If Texaco performs any future sampling, at any location, Texaco shall notify The NMOCD at least 48 hours in advance of the scheduled activities such that the NMOCD has the opportunity to witness the events and split samples.

If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 22, 2000  
UL E-Sec 31-T18S-R35E  
Central Vacuum Unit (WIS)

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>ARMCO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>Central Vacuum Unit (WIS)</i>	Facility Type <i>Water Injection Station</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>E</i>	<i>31</i>	<i>18S</i>	<i>35E</i>					<i>Lea</i>

*~ 72'*

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>450 bbls</i>	Volume Recovered <i>400 bbls</i>
Source of Release <i>TRUNK Line FROM Battery</i>	Date and Hour of Occurrence <i>2-15-00</i>	Date and Hour of Discovery <i>2-15-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>SULVIA</i>	
By Whom? <i>WAYNE</i>	Date and Hour <i>2-15-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Fiberglass TRUNK Line parted in Flange - Free liquid was removed. Area was filled-*

Describe Area Affected and Cleanup Action Taken.\*

*AFFECTED AREA 5000 sq. FT. GROUND WATER AROUND 140 FT*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOC rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOC marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOC acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by	
Printed Name: <i>Rodney Bailey</i>	District Supervisor:	
Title: <i>E.H.S. PROFESSIONAL</i>	Approval Date:	Expiration Date:
Date: <i>2-22-00</i> Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

*ag*



**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

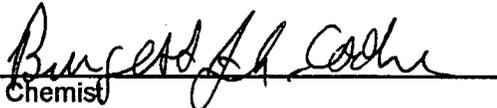
Receiving Date: 05/16/00  
Reporting Date: 05/18/00  
Project Number: NOT GIVEN  
Project Name: CENTRAL VACUUM UNIT  
Project Location: WATER INJECTION STATION

Sampling Date: NOT GIVEN  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl* (mg/Kg)
ANALYSIS DATE		05/16/00	05/16/00	05/17/00
H4879-1	-	<50	57.5	144
Quality Control		974	980	1020
True Value QC		1000	1000	1000
% Recovery		97.4	98.0	102
Relative Percent Difference		13.5	7.2	8.8

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

\*Analysis performed on a 1:4 w:v aqueous extract.

  
Chemist

  
Date

H4879A.XLS  
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



**ARDINAL  
LABORATORIES**

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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P, INC.  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 05/16/00  
Reporting Date: 05/18/00  
Project Number: NOT GIVEN  
Project Name: CENTRAL VACUUM UNIT  
Project Location: WATER INJECTION STATION

Sampling Date: NOT GIVEN  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: AH  
Analyzed By: BC

LAB NO.	SAMPLE ID	BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)
ANALYSIS DATE		05/16/00	05/16/00	05/16/00	05/16/00
H4879-1	-	<0.005	<0.005	<0.005	<0.015
Quality Control		0.087	0.094	0.090	0.270
True Value QC		0.100	0.100	0.100	0.300
% Recovery		87.1	93.8	90.4	90.0
Relative Percent Difference		1.7	3.7	1.4	0.1

METHOD: EPA SW-846 8260

Burton J. Cooke  
Chemist

5/18/00  
Date

**H4879B.XLS**  
PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



*Hobbs Operating Unit*

Texaco Exploration and Production Inc.  
P.O. Box 3109  
Midland, Texas 79702  
915 688-4100 tel  
915 688-4751 fax

Date: 6-23-00

Oil Conservation Division  
Attn: Donna Williams  
1625 N. French Drive  
Hobbs, NM 88240

Re: Produce Water Spills Vertical Extent

In response to the letters sent by the NMOCD, addressing produce water spills at the Buckeye FMT, Texaco conducted a survey to determine the vertical extent of different volumes of produce water. The native soil in the Buckeye area is about 6" to 1ft. Topsoil then caliche, with groundwater ranging from 72ft to over 150ft. The results are stated below:

1. On 2-23-00, a vehicle hit the piping coming from West Vacuum Unit # 58 releasing 320 bbls of produce water. Free liquid, 320 bbls, was removed by vacuum truck. The area affected was about 25,000-sq. ft. Samples were taken at a depth of 1 ft. show the TPH, GRO and the DRO less than 50 mg/kg, BTEX less than .005mg/kg and the chlorides at 11,800 mg/kg. Additional analysis at 2ft. show the chlorides to be 6160mg/kg.
2. On 2-15-00, a fiberglass line parted releasing 450bbls of produce water at the Central Vacuum Unit. Free liquid, 400bbls, was removed by vacuum truck. The area affected was around 5000 sq. ft. Samples taken at a depth of 4ft. show TPH, GRO less than 50mg/kg and DRO 57.5mg/kg, BTEX less than .005mg/kg and chlorides 144mg/kg.
3. On 1-28-00 internal corrosion on an old steel produce water flowline at the Vacuum Grayburg San Andres Unit # 15, caused a spill of 90 bbls. Free liquid, 80 bbls, was removed by vacuum truck. The area affected was about 1800sq. ft.. Samples taken at a depth of 2 ft. show TPH, GRO less than 50mg/kg and DRO 282mg/kg, BTEX less than .005mg/kg and chlorides 176mg/kg.
4. On 3-21-00 a transition piece where the poly line converts to steel line at the Central Vacuum Unit # 77, parted releasing 10 bbls of oil and 75 bbls of produce water on the location. Free liquid, 5 bbls oil and 60 bbls water, was removed by vacuum truck. The affected area was about 10,850 sq. ft. Samples taken at a depth of 2ft. show, GRO less than 50mg/kg and DRO 66mg/kg, BTEX less than .005mg/kg and chlorides 112mg/kg.

5. On 2-22-00 a by pass line on the circulating pump at the Vacuum Grayburg San Andres Unit water Station, parted releasing 75 bbls of produce water. Free liquid, 50 bbls, was removed by vacuum truck. The area affected was about 10,000 sq. ft. Samples were taken at a depth of 2ft. showing, GRO less than 50mg/kg and DRO less than 50mg/kg, BTEX less than .005mg/kg and chlorides 144 mg/kg.
6. On 1-30-00 a pump locked down at the Abo Consolidated Battery causing the storage tanks to overflow. 55 bbls of produce water was released on location. Free liquid, 50 bbls, was removed by vacuum truck. The area affected was 500sq. ft. Samples were taken at 18 inches showing, GRO less than 50mg/kg and DRO 777mg/kg, BTEX less than .005mg/kg and chlorides 160 mg/kg.

The examples above show the mg/kg reduced drastically in produce water spills from 1ft. to 4ft. Soils in this area keep migration of chlorides to a minimum.

Texaco would like to submit this report to the NMOCD as documentation for all produce water spills at the Buckeye FMT showing the depths different volumes will travel. As always the NMOCD form "C-141" will be filled out and sent in for each release but a chloride vertical extent will not be required.

If you have any questions please call me at 915-688-2971.

Sincerely



Rodney Bailey  
Texaco  
Hobbs Operating Unit



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191

Date: February 26, 2000

Ms. Donna Williams  
New Mexico Oil Conservation Division

*NOV*  
*L-6-18-35*  
*C-2-18-34 135*  
*E-31-18-35-72'*

Re: ✓ C-141; Sec12; T20S; R37E;  
x C-141; Sec31; T17S; R35E;  
C-141; Sec 1; T18S; R34E;

*31-18-35*

*80*  
*95*  
*24*

*(2)*

Dear Ms. Williams

As requested in our meeting on February 1<sup>st</sup>, attached are the analysis for the above mentioned sites. Chlorides test were conducted on each site and TPH on the Jal water system. As the reports show the TPH on the Jal water system site is well below NMOCD guidelines with groundwater around 145ft.

As discussed in our meeting, with Texaco providing this information on these sites, this answers the Notice of Violation letter send by Chris Williams dated December 16, 1999. I feel Texaco is going above and beyond the guidelines providing the NMOCD with these chloride analyses, showing a Texaco priority is to protect the environment. As talked about in our meeting and conservation's with other company representatives, some companies are not providing the NMOCD with this information and have stated to me they will not until it becomes a requirement. The NMOCD should strive to keep the playing field level for all companies.

If you have any questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
Hobbs Operating Unit

*[Faint, illegible text at the bottom of the page]*



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

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

ANALYTICAL RESULTS FOR  
 TEXACO E&P  
 ATTN: RODNEY BAILEY  
 205 E. BENDER  
 HOBBS, NM 88240  
 FAX TO:

Receiving Date: 02/14/00  
 Reporting Date: 02/16/00  
 Project Number: NOT GIVEN  
 Project Name: NOT GIVEN  
 Project Location: NOT GIVEN

Sampling Date: 02/14/00  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: BC  
 Analyzed By: BC

*Shading Range Organic*  
 GRO (C<sub>6</sub>-C<sub>10</sub>) (mg/Kg)      DRO (>C<sub>10</sub>-C<sub>28</sub>) (mg/Kg)  
*Diesel Range Organic*

LAB NUMBER    SAMPLE ID

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)
ANALYSIS DATE:		02/15/00	02/15/00
H4645-2	JAL WATER SYSTEM	59.4	1840
Quality Control		576	613
True Value QC		600	600
% Recovery		96.0	102
Relative Percent Difference		4.0	1.1

METHOD: SW-846 8015 M

*Burjeto P. Lopez*  
 Chemist

2/16/00  
 Date

H4645B.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

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

ANALYTICAL RESULTS FOR  
TEXACO E&P  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

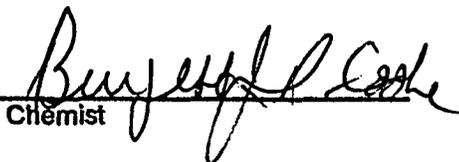
Receiving Date: 02/14/00  
Reporting Date: 02/16/00  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: NOT GIVEN

Analysis Date: 02/15/00  
Sampling Date: 02/14/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl <sup>-</sup> (mg/Kg)
H4645-1	CENTRAL VAC. UNIT	4920
H4645-2	JAL WATER SYSTEM	96
H4645-3	GREYBURG SAN ANDRES	3600
	#5	
Quality Control		910
True Value QC		1000
% Recovery		91
Relative Percent Difference		1.4

METHOD: Standard Methods 4500-ClB

Analyses performed on 1:4 w:v aqueous extracts.

  
Chemist

2/16/00  
Date

H4645A.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

STATE OF NEW MEXICO

---

---

FACSIMILE TRANSMITTAL SHEET

---

---

TO:  
ROGER ANDERSON

FROM:  
DONNA WILLIAMS

FAX NUMBER:  
827-8177

DATE:  
3-28-00

COMPANY:  
OCD-ENVIRONMENTAL  
BUREAU

TOTAL NO. OF PAGES INCLUDING  
COVER:  
4

PHONE NUMBER:

SENDER'S REFERENCE NUMBER:

RE:  
TEXACO

YOUR REFERENCE NUMBER:  
505-393-6161 EXT...113

URGENT

FOR REVIEW

PLEASE COMMENT

PLEASE REPLY

PLEASE RECYCLE

---

---

NOTES/COMMENTS:

Roger,

This is in reference to the email I had just sent to you. You may want this as a reference. Call me.

IF YOU HAVE ANY QUESTIONS PLEASE DON'T HESITATE TO CALL (505)- 393-6161 EXT...113

DONNA WILLIAMS





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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1990, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

December 16, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z 402 902 626**

Mr. Rodney Bailey  
Texaco Exploration & Production  
205 E Bender  
Hobbs, New Mexico 88240

**Subject: NOTICE OF VIOLATION**

Re: C-141; September 22, 1999: UL E, Sec 6, T18S, R35E  
C-141; September 22, 1999: UL C, Sec 2, T18S, R34E  
C-141; October 5, 1999: UL E, Sec 31, T18S, R35E

Dear Mr. Bailey:

By letters dated November 17, 1999, Texaco Exploration & Production Company (Texaco) was required to submit corrective action plans and/or remediation plans to the New Mexico Oil Conservation Division (OCD) for the above referenced sites. Texaco's letter dated November 29, 1999 acknowledges receipt of the OCD requirement and declines to submit the required plans.

Pursuant to 19 NMAC 15.C.116.D "CORRECTIVE ACTION: The responsible person must complete Division approved corrective actions for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 ....."  
Texaco is in violation of 19 NMAC 15.C.116.D for failure to submit the remediation plans for OCD approval.

**Texaco must submit for OCD approval detailed corrective action or remediation plans addressing the spills at the above referenced locations by December 31, 1999. Failure to respond to this Notice of Violation will result in further enforcement action.**

If you have any questions or comments, please contact me at (505) 393-6161 ext-102

Sincerely,

Chris Williams  
District Supervisor

cc: Lori Wrotenbery, Director  
Rand Carroll, Legal Counsel



Texaco Exploration and Production Inc

P O Box 1929  
Eunice NM 88231 1929

Date: November 29, 1999

Oil Conservation Division  
Attn: Donna Williams  
1625 N. French Drive  
Hobbs, NM 88240

Re: C141 Submitted:  
UL C-Sec 2-Ts18S-R34E  
UL E-Sec 31-Ts18S-R35E  
UL E-Sec 6-Ts18S-R35E

Dear Ms. Williams:

In response to your letter dated November 17, 1999 addressing the above mentioned C141 reports. I can find no indication in the guidelines that an operator is required to submit a corrective action plan and/or a remediation plan for produce water spills, unless there has been an impact to surface or ground water. As a result, Texaco does not feel the NMOCD is authorized to request such a plan.

If you have additional questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
EH&S Coordinator



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

November 17, 1999

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on October 5, 1999  
UL E-Sec 31-Ts18S-R35E

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **Please submit to NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days from receipt of this letter.** Please include Chlorides in the sampling activities. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505)393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 111 South First  
 Artesia, NM 88210  
 District III (505) 334 - 6178  
 000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C-141  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>	
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>	
Facility Name <b>Central Vacuum Unit</b>		Facility Type <b>Tank Battery</b>	
Surface Owner	Mineral Owner	Lease No.	

**LOCATION OF RELEASE**

Grid Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	31	18S	35E					Lea

**NATURE OF RELEASE**

Type of Release <b>Produced Water</b>	Volume of Release <b>600 bbls</b>	Volume Recovered <b>560 bbls</b>
Source of Release <b>main water injection lines.</b>	Date and Hour of Occurrence <b>9-25-99</b>	Date and Hour of Discovery <b>9-25-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>9-25-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

Was a Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

**Fiberglass line busted due to pressure surge and improper makeup. Free liquid removed.**

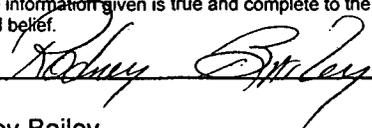
Describe Area Affected and Cleanup Action Taken. \*

**Affected area 40000 sq. ft. Ground water around 140ft.**

**Texaco request closure on this site.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc).\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature 	Printed Name: <b>Rodney Bailey</b>	Approved by District Supervisor	
Title: <b>EHS Professional</b>		Approval Date:	Expiration Date
Date: <b>397-0422</b>	Phone: <b>397-0422</b>	Conditions of Approval:	Attached <input type="checkbox"/>

Bell  
06-17-00

Action  
STACK

will  
grab  
samples

Rodney Bailey

Sent an  
e-mail to upper  
management

(→ They are requiring  
them not to do  
anything.)

by  
Rodney  
Bailey

will  
find  
vertical's  
on these

---

went through  
& signed off on  
some 2500 C-141's  
Pulled these out - Rodney  
said he would do what  
ever ECO wanted him  
to do -

\* Nothing  
has been  
done since

→ February 01, 2000  
CM

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 South First  
 Mesquite, NM 88210  
 District III (505) 334 - 6178  
 10 Rio Brazos Road  
 Hobbs, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

**Form C-141**  
 Originated 2/13/97

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**Release Notification and Corrective Action**

**OPERATOR**

Initial Response     Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>	
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>	
Facility Name <b>vacuum Grayburg San Andres Unit # 5</b>		Facility Type <b>Injection System</b>	
Surface Owner	Mineral Owner	Lease No.	

**LOCATION OF RELEASE**

Grid Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>N</b>	<b>1</b>	<b>18S</b>	<b>34E</b>					<b>Lea</b>

**NATURE OF RELEASE**

Type of Release <b>193</b> <b>Produced Water</b>	Volume of Release <b>200 bbls</b>	Volume Recovered <b>0</b>
Source of Release <b>Produced Water Flowline</b>	Date and Hour of Occurrence <b>12-5-99</b>	Date and Hour of Discovery <b>12-5-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>12-5-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.		

**Describe Cause of Problem and Remedial Action Taken.\***

**Internal Corrosion on steel line. Placed caliche on road area. Tilled the spill area in the pasture. No other action taken.**

**Describe Area Affected and Cleanup Action Taken.\***

**Affected area 4800 sq. ft. Ground water around 140ft.**

**Describe General Conditions Prevailing (Temperature, Precipitation, etc).\***

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

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

Signature: *Rodney Bailey*

Printed Name: **Rodney Bailey**

Title: **EHS Professional**

Date: \_\_\_\_\_ Phone: **207 0422**

**OIL CONSERVATION DIVISION**

Approved by: \_\_\_\_\_  
District Supervisor

Approval Date: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Conditions of Approval: \_\_\_\_\_

Attached

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 1111 South First  
 Mesquite, NM 88210  
 District III (505) 334 - 6178  
 100 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

**Form C-141**  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Vacuum Grayburg San Andres Unit # 5</b>		Facility Type <b>Injection Well</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Grid Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	1	18S	34E					Lea

**NATURE OF RELEASE**

Type of Release <b>123 Produce Water</b>	Volume of Release <b>200 bbls water</b>	Volume Recovered <b>71 bbls</b>
Source of Release <b>Needle Valve on wellhead</b>	Date and Hour of Occurrence <b>4-18-99</b>	Date and Hour of Discovery <b>4-18-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>R</b>	Date and Hour <b>4-18-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

**Corrosion on needle valve. Removed free liquid.**

Describe Area Affected and Cleanup Action Taken. \*

**Area affected: 21000 sq. ft. Vertical extent 1 ft. Site closed.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCDD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCDD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCDD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature <i>Rodney Bailey</i>	Printed Name: <b>Rodney Bailey</b>	Approved by District Supervisor	Approval Date:
Signature <b>EHS Professional</b>	Phone:	Expiration Date	Conditions of Approval:

District I (505) 393 - 6161  
 P. O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 -1283  
 811 Sout First  
 Artesia, NM 88210  
 District III (505) 334 - 6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C-141  
 Originated 2/13/97

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 Appropriate District  
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**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Vacuum Grayburg San Andres # 5</b>		Facility Type <b>Injection line</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	1	18S	34E					Lea

**NATURE OF RELEASE**

Type of Release <b>Produce Water</b>	Volume of Release <b>100 bbls</b>	Volume Recovered <b>20 bbls</b>
Source of Release <b>Injection line</b>	Date and Hour of Occurrence <b>2-5-99</b>	Date and Hour of Discovery <b>2-5-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>George Garcia</b>	Date and Hour <b>2-5-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*  <b>Internal Corrosion. Free liquid removed.</b>		
Describe Area Affected and Cleanup Action Taken.*  <b>Area affected: 3540 sq. ft. Vertical extent is 3 ft.. Site closed.</b>		
Describe General Conditions Prevailing (Temperature, Precipitation, etc).*		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature <i>Rodney Bailey</i>	Printed Name: <b>Rodney Bailey</b>	Approved by District Supervisor	
Title: <b>EHS Professional</b>	Date: <b>2-16-99</b>	Approval Date:	Expiration Date
Phone: <b>397-0422</b>	Conditions of Approval:		Attached <input type="checkbox"/>

District I (505) 393 - 6161  
P.O. Box 1940  
Hobbs, NM 88241-1980  
District II (505) 748 - 1283  
811 Sout First  
Artesia, NM 88210  
District III (505) 334 - 6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C-141  
Originated 2/13/97

Submitted 2 Copies to  
Appropriate District  
Office in accordance  
with Rule 116 on  
back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Jal Water System</b>		Facility Type <b>Injection System</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Grid Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
M	12	20S	37E					Lea

**NATURE OF RELEASE**

Type of Release <b>Crude Oil and Produce Water</b>	Volume of Release <b>365 bbls oil, 150 water</b>	Volume Recovered <b>330 oil, 100 water</b>
Source of Release <b>Storage Tanks</b>	Date and Hour of Occurrence <b>5-22-99</b>	Date and Hour of Discovery <b>5-22-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>6-1-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

Producing Well was placed on hand. Tanks overflowed. Oily dirt will be removed. Texaco Property.

Describe Area Affected and Cleanup Action Taken. \*

Affected area 13797 sq. ft. Vertical extent less than 1 ft. Site closed.

Describe General Conditions Prevailing (Temperature, Precipitation, etc).\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief. Signature:		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Rodney Bailey</b>		Approved by District Supervisor	
Title: <b>EHS Professional</b>		Approval Date:	Expiration Date
Date: <b>6-2-99</b>	Phone: <b>397-0422</b>	Conditions of Approval:	Attached <input type="checkbox"/>

1

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 11 South First  
 Mesita, NM 88210  
 District III (505) 334 - 6178  
 100 Rio Brazos Road  
 Zia, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

**Form C-141**  
 Originated 2/13/97

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 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Central Vacuum Unit</b>		Facility Type <b>Battery</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<b>E</b>	<b>31</b>	<b>17S</b>	<b>35E</b>				<b>Lea</b>

**NATURE OF RELEASE**

Volume of Release <b>200 bbls water</b>	Volume Recovered <b>100 bbls</b>
Date and Hour of Occurrence <b>11-9-99</b>	Date and Hour of Discovery <b>11-9-99</b>
Is Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	
If YES, to Whom? <b>Sylvia</b>	
Whom <b>Rodney Bailey</b>	Date and Hour <b>11-10-99</b>
Is a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If YES, Volume Impacting the Watercourse.	

\*Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

**External damage from rocks on fiberglass pipe. Area was tilled. Free liquid removed.**

Describe Area Affected and Cleanup Action Taken.\*

**Affected area 10,000 sq. ft. Ground water around 140ft.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc).\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature: <i>Rodney Bailey</i>		Approved by District Supervisor	
Printed Name: <b>Rodney Bailey</b>		Approval Date:	Expiration Date:
Title: <b>EHS Professional</b>		Conditions of Approval:	
Date: <b>1-17-99</b>	Phone: <b>397-0422</b>	Attached <input type="checkbox"/>	

611



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

*Bill  
06-12-00*

June 12, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on May 12, 2000  
UL H-Sec 5-T25S-R38E  
West Dollarhide Drinkard Unit # 84

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

*Donna Williams*

Donna Williams  
Environmental Engineer Specialist

cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor  
cc: Lori Wrotenbery - Director

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>PERMO GAP INC.</i>	Contact <i>Rodney Bailey</i>
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>
Facility Name <i>West Sulfuride Drivard Unit #84</i>	Facility Type <i>Water Injection well</i>

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>H</i>	<i>5</i>	<i>25S</i>	<i>38E</i>					<i>Lea</i>

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>50 bbls</i>	Volume Recovered <i>45 bbls</i>
Source of Release <i>Fiberglass lateral line</i>	Date and Hour of Occurrence <i>5-3-00</i>	Date and Hour of Discovery <i>5-3-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>LARRY OWEN</i>	Date and Hour <i>5-3-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*2" Fiberglass line rubbing against rocks. One foot soil with niche rock under the soil. Free liquid was removed.*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 15,750 sq ft. Ground water around 140 ft.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>E.H. Professional</i>	Conditions of Approval:	
Date: <i>5-12-00</i> Phone:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*A*

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

DW/BH

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
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side of form

**Release Notification and Corrective Action**

**OPERATOR**  Initial Report  Final Report

Name of Company <i>Alkaco</i>	Contact <i>Rodney Bailey</i>
Address	Telephone No.
Facility Name <i>WOODK #84</i>	Facility Type

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>A</i>	<i>5</i>	<i>25</i>	<i>38</i>					

**NATURE OF RELEASE**

Type of Release <i>prod water</i>	Volume of Release <i>50</i>	Volume Recovered <i>45</i>
Source of Release	Date and Hour of Occurrence <i>5/31/00</i>	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Debra A. Dickey</i>	
By Whom?	Date and Hour <i>5/31/00 1:25 PM</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*  
*No Cattle*

INSPECTED BY: *Ruddy Hill* DATE *5-9-00*

CLEAN UP IN PROGRESS:  YES  NO

REMARKS: *OIL/IRON SPRAY + STAIN*

Describe Cause of Problem and Remedial Action Taken.\*  
*7ubeiglass pipe busted*

Describe Area Affected and Cleanup Action Taken.\*  
*1575 sq ft.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		<b>OIL CONSERVATION DIVISION</b>	
		Approved by District Supervisor:	
Printed Name:		Approval Date:	Expiration Date:
Date:	Phone:	Conditions of Approval:	
			Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 12, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on May 17, 2000  
UL H-Sec 30-T21S-R37E  
VM Henderson

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist

cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

cc: Lori Wrotenbery - Director

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>VM Henderson</i>	Facility Type <i>TANK BATTERY</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>H</i>	<i>30</i>	<i>21S</i>	<i>37E</i>					<i>Lea</i>

*~100'*

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>60 bbls</i>	Volume Recovered <i>50 bbls</i>
Source of Release <i>STORAGE TANK</i>	Date and Hour of Occurrence <i>5-2-00</i>	Date and Hour of Discovery <i>5-2-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>JULVIA</i>	
By Whom? <i>Rodney Bailey</i>	Date and Hour <i>5-2-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*TRANSFER pump locked down CAUSING TANK to overflow - WATER STAYED on location and the ROAD ONE FEET TOP SOIL THEN CATCHES.*

Describe Area Affected and Cleanup Action Taken.\*

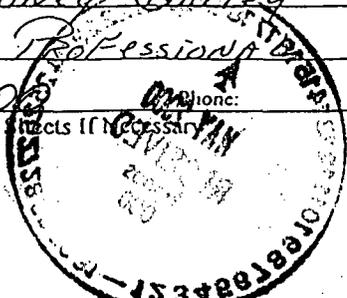
*AFFECTED AREA 14,000 sq. ft. GROUND WATER AROUND 100 FT-*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>E.H.S. PROFESSIONAL</i>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <i>5-12-00</i>	Phone:	

\* Attach Additional Contacts If Necessary



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>Texaco</i>	Contact <i>Rodney Bailey</i>
Address	Telephone No. <i>397-0422</i>
Facility Name <i>VM Henderson</i>	Facility Type

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>H</i>	<i>30</i>	<i>21</i>	<i>37</i>					

NATURE OF RELEASE

Type of Release <i>product</i>	Volume of Release <i>40</i>	Volume Recovered <i>20</i>
Source of Release	Date and Hour of Occurrence <i>5/2/00</i>	Date and Hour of Discovery <i>5/2/00</i>
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia Dickey</i>	
By Whom?	Date and Hour <i>5/2/00 12:50 PM</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

INSPECTED BY: *Buddy Hill* DATE: *5-3-00*

CLEAN UP IN PROGRESS:  YES  NO

REMARKS: *HEAVY OIL/WATER STAIN, NO FLUID.*

Describe Cause of Problem and Remedial Action Taken.\*

*Pump locked down - tank ran over.*

Describe Area Affected and Cleanup Action Taken.\*

*14,000' sq ft*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature:	Approved by		
Printed Name:	District Supervisor:		
Title:	Approval Date:	Expiration Date:	
Date:	Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 12, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on May 17, 2000  
UL F-Sec 6-T18S-R35E  
Central Vacuum Unit Satellite #5

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist

cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor  
cc: Lori Wrotenbery, Director

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
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1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1997

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>Texaco E &amp; P Inc.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>Central Vacuum Unit satellite #5</i>	Facility Type <i>Produce Water system</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>F</i>	<i>6</i>	<i>18S</i>	<i>35E</i>					<i>Lea</i>

Scale  $\rightarrow$   $79.18' \rightarrow 103.98'$

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>35 bbls</i>	Volume Recovered <i>30 bbls</i>
Source of Release <i>Piping at the satellite</i>	Date and Hour of Occurrence <i>4-20-00</i>	Date and Hour of Discovery <i>4-20-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>Manuel</i>	Date and Hour <i>4-20-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*High Pressure and corrosion caused piping to blow out - On location -  
Cudiche pad -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 100 sq. ft. Ground water around 101 ft*

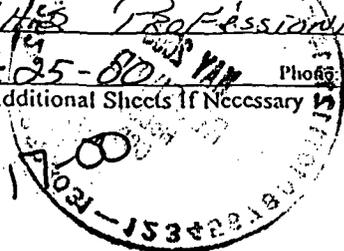
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by: District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>Professional</i>	Conditions of Approval:	
Date: <i>4-25-00</i> Phone:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

Received  
m 5-1



District I - (505) 393-6161  
 E. O. Box 980  
 Hobbs, NM 88241-1980  
 District II - (505) 748-1283  
 811 South First  
 Artesia, NM 88210  
 District III - (505) 334-6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV - (505) 827-7131

State of New Mexico  
 Energy Minerals and Natural Resources Department  
 Oil Conservation Division  
 2040 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827-7131

Form C-141  
 Originated 2/13/97

Submit 2 copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name <i>Mexaco</i>	Contact <i>Manuel Adena</i>	
Address	Telephone No.	
Facility Name <i>CVU Sat #5</i>	Facility Type <i>396-4414 SAT 108</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>SE 1/4</i>	<i>6</i>	<i>18</i>	<i>35</i>					

*of NW/4*

NATURE OF RELEASE

Type of Release <i>1 1/2" line burst</i>	Volume of Release <i>35 B/W</i>	Volume Recovered <i>30 B/W</i>
Source of Release	Date and Hour of Occurrence <i>4/20/00 5:15 PM</i>	Date and Hour of Discovery <i>4/20/00 5:30 PM</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia Dicker</i>	
By Whom?	Date and Hour <i>4/21/00 1:10 PM</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully (Attach Additional Sheets If Necessary) INSPECTED BY: *Robinson* DATE *4-24-2000*  
*No Cattle* CLEAN UP IN PROGRESS:  YES  NO *4-24*

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary) REMARKS:  
*Corrosion* *oil spots on location*

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)  
*100 sq ft - (+)*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	<b>OIL CONSERVATION DIVISION</b>		
Printed Name:	Approved by District Supervisor:	Approval Date:	Expiration Date:
Title:	Conditions of Approval:		Attached <input type="checkbox"/>
Date:	Phone:		



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

**Lori Wrotenbery**  
Director  
Oil Conservation Division

June 12, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on May 12, 2000  
UL K-Sec 30-T17S-R35E  
Central Vacuum Unit # 30

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist

cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor  
cc: Lori Wrotenbery - Director

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>TECNICO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>CENTRAL VACUUM UNIT #30</i>	Facility Type <i>Injection well</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>K</i>	<i>30</i>	<i>17S</i>	<i>35E</i>					<i>Lea</i>

Sec 29-076.61      Sec 31-095.01

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>30 bbls</i>	Volume Recovered <i>- 0 -</i>
Source of Release <i>Connection on Well Head</i>	Date and Hour of Occurrence <i>4-23-00</i>	Date and Hour of Discovery <i>4-23-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sudura</i>	
By Whom? <i>John Sipes</i>	Date and Hour <i>4-23-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*EXTERNAL CORROSION. AREA CONSIST OF ABOUT 2FT TOP SOIL WITH MISCHE ROCK UNDER  
RESOIL. NO OTHER LEAKS NOTIED IN THIS AREA.*

Describe Area Affected and Cleanup Action Taken.\*

*AFFECTED AREA 3600 sqft. GROUND WATER AROUND 95ft -*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Rodney Bailey</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Title: <i>GHS PROFESSIONAL</i>	Approval Date:	Expiration Date:
Date: <i>5-2-00</i> Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

*AP*

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

DW/JK

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

OPERATOR

Initial Report  Final Report

Name of Company <i>VERACO</i>	Contact <i>JOHN</i>	
Address	Telephone No.	
Facility Name <i>Central Vac Wt # 30</i>	Facility Type <i>396-4414/631-9129</i>	
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>K</i>	<i>30</i>	<i>17</i>	<i>35</i>					

**NATURE OF RELEASE**

Type of Release <i>water</i>	Volume of Release <i>30 B/W</i>	Volume Recovered
Source of Release	Date and Hour of Occurrence <i>4/24/00</i>	Date and Hour of Discovery <i>same</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Debra Dickey</i>	
By Whom?	Date and Hour <i>4/24/00 2:15pm</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Leak on tubing. Currently spraying at this time. In process of getting pullight.*

Describe Area Affected and Cleanup Action Taken.\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

**OIL CONSERVATION DIVISION**

Signature:	Approved by District Supervisor:	
Printed Name:	Approval Date:	Expiration Date:
Title:	Attached <input type="checkbox"/>	
Date:	Phone:	Conditions of Approval:

\* Attach Additional Sheets If Necessary

*Bill*  
*06-12-00*

---

---

**FACSIMILE TRANSMITTAL SHEET**

---

---

TO:	FROM:
<b>ROGER ANDERSON</b>	<b>DONNA WILLIAMS</b>
FAX NUMBER:	DATE:
<b>827-8177</b>	<b>3-28-00</b>
COMPANY:	TOTAL NO. OF PAGES INCLUDING COVER:
<b>OCD-ENVIRONMENTAL BUREAU</b>	<b>4</b>
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
<b>TEXACO</b>	<b>505-393-6161 EXT...113</b>

---

URGENT                       FOR REVIEW                       PLEASE COMMENT

---

PLEASE REPLY                       PLEASE RECYCLE

---

---

NOTES/COMMENTS:

**Roger,**

**This is in reference to the email I had just sent to you. You may want this as a reference. Call me.**

IF YOU HAVE ANY QUESTIONS PLEASE DON'T HESITATE TO CALL (505)- 393-6161 EXT...113

DONNA WILLIAMS



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191

Date: February 26, 2000

Ms. Donna Williams  
New Mexico Oil Conservation Division

*NOV*  
*L-6-18-35*  
*C-2-18-34 135*  
*E-31-18-35-72'*

Re: ✓ C-141; Sec12; T20S; R37E;  
      ✓ C-141; Sec31; T17S; R35E;  
      C-141; Sec 1; T18S; R34E;

*8*  
*95*  
*24*

*(2)*

Dear Ms. Williams

As requested in our meeting on February 1<sup>st</sup>, attached are the analysis for the above mentioned sites. Chlorides test were conducted on each site and TPH on the Jal water system. As the reports show the TPH on the Jal water system site is well below NMOCD guidelines with groundwater around 145ft.

As discussed in our meeting, with Texaco providing this information on these sites, this answers the Notice of Violation letter send by Chris Williams dated December 16, 1999. I feel Texaco is going above and beyond the guidelines providing the NMOCD with these chloride analyses, showing a Texaco priority is to protect the environment. As talked about in our meeting and conservation's with other company representatives, some companies are not providing the NMOCD with this information and have stated to me they will not until it becomes a requirement. The NMOCD should strive to keep the playing field level for all companies.

If you have any questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
Hobbs Operating Unit



**ARDINAL  
LABORATORIES**

PHONE (915) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

**ANALYTICAL RESULTS FOR  
TEXACO E&P  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:**

Receiving Date: 02/14/00  
Reporting Date: 02/16/00  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: NOT GIVEN

Sampling Date: 02/14/00  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: BC  
Analyzed By: BC

LAB NUMBER    SAMPLE ID

*Sampling Range Organics*  
GRO                      DRO  
(C<sub>6</sub>-C<sub>10</sub>)              (>C<sub>10</sub>-C<sub>28</sub>)  
(mg/Kg)                      (mg/Kg)  
*Diesel Range Organics*

ANALYSIS DATE:	02/15/00	02/15/00
H4645-2      JAL WATER SYSTEM	59.4	1840
Quality Control	576	613
True Value QC	600	600
% Recovery	96.0	102
Relative Percent Difference	4.0	1.1

METHOD: SW-846 8015 M

*Burjeto P. Castro*  
Chemist

2/16/00  
Date

H4645B.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.







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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

March 2, 2000

Texaco E & P  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, New Mexico 88240

Re: C-141: Submitted on 12-23-99  
UL B-Sec 30-T17S-R35E

Dear Mr. Bailey,

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **Please submit to NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days from receipt of this letter. Please include BTEX, TPH and Chlorides in the sampling activities.**

If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

*Donna Williams*

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

Requested Remediation Plan:  
CVU # 7  
UL B - sec 30 - T17S - R35E  
Spilled -> 40bbls  
Rec -> 0  
- NO Response -

District I (505) 333 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 1st South First  
 Hobbs, NM 88210  
 District III (505) 334 - 6178  
 300 Rio Brazos Road  
 Hobbs, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

**Form C-141**  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>	Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>	Telephone No. <b>397 - 0422</b>
Facility Name <b>Central Vacuum Unit # 7</b>	Facility Type <b>Injection System</b>
Lease Owner	Mineral Owner
Lease No.	

**LOCATION OF RELEASE**

Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	30	17S	35E					Lea

**NATURE OF RELEASE**

Type of Release <b>Produced Water</b>	Volume of Release <b>40 bbls water</b>	Volume Recovered <b>0</b>
Type of Release <b>Produced Water Lateral line</b>	Date and Hour of Occurrence <b>12-17-99</b>	Date and Hour of Discovery <b>12-17-99</b>
Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <p style="text-align: center;"><b>Sylvia</b></p>	
Name <p style="text-align: center;"><b>John Sipes</b></p>	Date and Hour <p style="text-align: right;"><b>12-17-99</b></p>	
Did a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

Watercourse was Impacted. Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

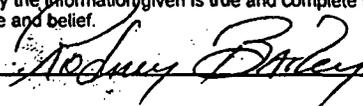
**Chemical Corrosion, leaking around threads. No free liquid to remove. No action taken.**

Describe Area Affected and Cleanup Action Taken. \*

**Affected area 15,700 sq. ft. Ground water around 140ft.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCDD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCDD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCDD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief. Signature:  Printed Name: <b>Rodney Bailey</b>	<b>OIL CONSERVATION DIVISION</b>  Approved by _____ District Supervisor
Title: <b>EHS Professional</b>	Approval Date: _____ Expiration Date: _____
Date: <b>2-23-99</b> Phone: <b>397-0422</b>	Conditions of Approval: _____ Attached <input type="checkbox"/>

*DW*



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT I HOBBS
PO BOX 1980, Hobbs, NM 88241
(505) 393-6161
FAX (505) 393-0720

Jennifer A. Salisbury
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.
Attn: Rodney Bailey
205 E. Bender
Hobbs, NM 88240

Re: C-141: Submitted on February 4, 2000
UL K-Sec 2-Ts18S-R34E
Grayburg San Andres Unit #15

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams

Donna Williams
Environmental Engineer Specialist

cc: Roger Anderson - Environmental Bureau Chief
Chris Williams - District I Supervisor

\* 05-02-00 @ 8:45
\* Talked w/ Rodney on these - will gather info on these leaks - Perform TPH - BTEX & CI - on all - draw a map give depth that sample was taken at.

\* Rodney called on 05-15-00 about Ron's welding will be doing this week sampling this week some time.
D.W.
on April 20, 2000
Letters -

\* Also will send in closure Report on Vacuum GSAU #66
D.W.

District I (505) 333 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 111 Sout First  
 Artesia, NM 88210  
 District III (505) 334 - 6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C  
 Originated 2/

Submitted 2 Copi  
 Appropriate D  
 Office in accor  
 with Rule 1  
 back side o

**Release Notification and Corrective Action**

**OPERATOR**

Initial Respon  Final

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Vacuum Grayburg San Andres Unit # 15</b>		Facility Type <b>Injection System</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
K	2	18S	34E					Lea

*≈ 94-135'*

**NATURE OF RELEASE**

Type of Release <b>Produce Water</b>	Volume of Release <b>90 bbls water</b>	Volume Recovered <b>80 bbls water</b>
Source of Release <b>Flowline to battery</b>	Date and Hour of Occurrence <b>1-28-00</b>	Date and Hour of Discover <b>1-28-00</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>inda</b>	Date and Hour <b>1-28-00</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

**Describe Cause of Problem and Remedial Action Taken. \***

**internal corrosion on old steel pipe. Free liquid removed. Area tilled because of oil mist. No other action taken.**

**Describe Area Affected and Cleanup Action Taken. \***

**Affected area 1800 sq. ft. Ground water around 140ft.**

**Describe General Conditions Prevailing (Temperature, Precipitation, etc).\***

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief. Signature <i>Rodney Bailey</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Rodney Bailey</b>		Approved by District Supervisor	= :
Title: <b>EHS Professional</b>	Approval Date:	Expiration Date	
Date: <b>2-4-00</b>	Phone: <b>397-0422</b>	Conditions of Approval:	Attached <input type="checkbox"/>



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on March 22, 2000  
UL I-Sec 36-T17S-R34E  
Central Vacuum Unit #77

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO E &amp; P Inc.</i>		Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>		Telephone No. <i>505-397-0422</i>	
Facility Name <i>Central Vacuum Unit # 77</i>		Facility Type <i>Producing well</i>	
Surface Owner	Mineral Owner	Lease No.	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>I</i>	<i>36</i>	<i>17S</i>	<i>34E</i>					<i>CEA</i>

*~123'*

NATURE OF RELEASE

Type of Release <i>Crude oil &amp; Produce water</i>	Volume of Release <i>10 oil 75 water</i>	Volume Recovered <i>5 oil 60 water</i>
Source of Release <i>Flowline</i>	Date and Hour of Occurrence <i>3-21-00</i>	Date and Hour of Discovery <i>3-21-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>Rodney Bailey</i>	Date and Hour <i>3-22-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Transition piece from poly to steel parted - spill contained on location -*

*location ~~was~~ contaminated soil was removed to taraco landfarm -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 10,850 sq. ft. Ground water around 130 to 140 ft -*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>Rodney Bailey</i>		OIL CONSERVATION DIVISION	
Printed Name: <i>Rodney Bailey</i>			
Title: <i>EIT Professional</i>	Approved by District Supervisor:	Approval Date:	Expiration Date:
Date: <i>3-22-00</i> Phone:	Conditions of Approval:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*PP*



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 25, 2000  
UL G-Sec 3-T18S-R34E  
West Vacuum Unit #58

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>TEXACO E &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>West Vacuum Unit #58</i>	Facility Type <i>Injection System</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>C</i>	<i>3</i>	<i>18S</i>	<i>34E</i>					<i>Lea</i>

*7-98-140'*

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>320 bbls</i>	Volume Recovered <i>310 bbls</i>
Source of Release <i>Vehicle hit piping on well head</i>	Date and Hour of Occurrence <i>2-23-00</i>	Date and Hour of Discovery <i>2-23-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>SUCUA</i>	
By Whom? <i>MARK</i>	Date and Hour <i>2-23-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Vehicle hit piping on well head - Free liquid removed -  
No other action taken -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 25,000 sq. ft. Ground water around 140 ft.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	
Date: <i>2-25-00</i> Phone:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 22, 2000  
UL E-Sec 1-T18S-R34E  
Vacuum Grayburg San Andres Unit #33

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pachoco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pachoco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>TECONO E &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>VACUUM GRAYBURG SAN ANDRES UNIT #33</i>	Facility Type <i>Injection System</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>E</i>	<i>1</i>	<i>185</i>	<i>34E</i>					<i>2EA</i>

*~123'*

NATURE OF RELEASE

Type of Release <i>Produce water</i>	Volume of Release <i>48 bbls</i>	Volume Recovered <i>-0-</i>
Source of Release <i>Flow line</i>	Date and Hour of Occurrence <i>2-17-00</i>	Date and Hour of Discovery <i>2-17-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>SALVIA</i>	
By Whom? <i>George</i>	Date and Hour <i>2-17-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		

Describe Cause of Problem and Remedial Action Taken.\*

*Corrosion on pipe - Replace with High Pressure Flex Hose -*

*No action taken -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 50 FT. Ground water around*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <i>2-22-00</i> Phone:		

\* Attach Additional Sheets If Necessary

*dup*



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 25, 2000  
UL C-Sec 2-T18S-R34E  
Vacuum Grayburg San Andres Unit

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

*Donna Williams*

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>EXXCO E &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>Vacuum Grayburg San Andros Unit</i>	Facility Type <i>Water Station</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>C</i>	<i>2</i>	<i>18S</i>	<i>34E</i>					<i>Lea</i>

*~ 98-135'*

NATURE OF RELEASE

Type of Release <i>Produce Water</i>	Volume of Release <i>75 bbls</i>	Volume Recovered <i>50 bbls</i>
Source of Release <i>Bypass Line on Pumps</i>	Date and Hour of Occurrence <i>2-22-00</i>	Date and Hour of Discovery <i>2-22-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>George</i>	Date and Hour <i>2-22-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Improper Alignment & vibration - Free Liquid Removed - Area Filled -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 10000 sq. Ft. Ground Water Around 140 FT*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>E.H.S. PROFESSIONAL</i>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <i>2-25-00</i> Phone:		

\* Attach Additional Sheets If Necessary

*dup*



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 22, 2000  
UL E-Sec 31-T18S-R35E  
Central Vacuum Unit (WIS)

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pachoco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pachoco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>MOGASO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>CENTRAL VACUUM UNIT (WES)</i>	Facility Type <i>Water Injection Station</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>E</i>	<i>31</i>	<i>18S</i>	<i>35E</i>					<i>Lea</i>

*~ 72'*

NATURE OF RELEASE

Type of Release <i>PRODUCE WATER</i>	Volume of Release <i>450 bbls</i>	Volume Recovered <i>400 bbls</i>
Source of Release <i>TRUNK LINE FROM BATTERY</i>	Date and Hour of Occurrence <i>2-15-00</i>	Date and Hour of Discovery <i>2-15-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>WAYNE</i>	Date and Hour <i>2-15-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Fiberglass TRUNK LINE PARTED IN FLANGE - FREE LIQUID WAS  
REMOVED. AREA WAS FILLED-*

Describe Area Affected and Cleanup Action Taken.\*

*AFFECTED AREA 5000 sq. FT. GROUND WATER AROUND 140 FT*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	Attached <input type="checkbox"/>
Date: <i>2-22-00</i> Phone:		

\* Attach Additional Sheets If Necessary

*ppp*



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 22, 2000  
UL M-Sec 19-T24S-R37E  
Cooper Jal Unit #220

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>Cooper JAL Unit #220</i>	Facility Type <i>Injection System</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>M</i>	<i>19</i>	<i>24S</i>	<i>37E</i>					<i>Lea</i>

*117'*

NATURE OF RELEASE

Type of Release <i>Produce water</i>	Volume of Release <i>140 bbls</i>	Volume Recovered <i>130 bbls</i>
Source of Release <i>Lateral line</i>	Date and Hour of Occurrence <i>2-5-00</i>	Date and Hour of Discovery <i>2-5-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>Sylvia</i>	
By Whom? <i>George</i>	Date and Hour <i>2-5-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Bad weld on steel line - Corrosion - Removed free liquid -  
No other action taken -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area - 3,600 sq ft. Groundwater around 1404-*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>E.H.S. PROFESSIONAL</i>	Conditions of Approval:	
Date: <i>2-22-00</i> Phone:	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*899*



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 20, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on February 4, 2000  
UL A-Sec 7-T18S-R31E  
Abo Consolidated Battery

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 1100 South First  
 Hobbs, NM 88210  
 District III (505) 334 - 6178  
 100 Rio Brazos Road  
 Hobbs, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form  
 Originate

Submitted 2  
 Appropriate  
 Office in  
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**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final

Name: <b>Texaco E &amp; P Inc.</b> Address: <b>205 E Bender Hobbs, NM</b> Facility Name: <b>Consolidated Battery</b> Lease Owner: _____	Contact: <b>Rodney Bailey</b> Telephone No.: <b>397 - 0422</b> Facility Type: <b>Tank Battery</b> Mineral Owner: _____ Lease No.: _____
--	---

**LOCATION OF RELEASE**

Section Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	7	18S	31E					Lea

*≈ 200-400'*

**NATURE OF RELEASE**

Type of Release: <b>Produced Water</b>	Volume of Release: <b>55 bbls water</b>	Volume Recovered: <b>50 bbls water</b>
Type of Release: <b>Storage Tank</b>	Date and Hour of Occurrence: <b>1-30-00</b>	Date and Hour of Discovery: <b>1-30-00</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Buddy</b>	
Whom: <b>atsi</b>	Date and Hour: <b>1-30-00</b>	
Did it Reach a Watercourse? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

**ump locked down causing tanks to overflow. Free liquid removed. No other action taken.**

Describe Area Affected and Cleanup Action Taken. \*

**Affected area 500 sq. ft. Ground water around 140ft.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

Operator hereby certifies that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

Operator hereby certifies the information given is true and complete to the best of my knowledge and belief.

Signature: *Rodney Bailey*  
 Printed Name: **Rodney Bailey**

**OIL CONSERVATION DIVISION**

Approved by  
 District Supervisor

Approval Date:

Expiration Date:

File: **EHS Professional**

Date: \_\_\_\_\_ Phone: \_\_\_\_\_

Conditions of Approval:

Attached



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

May 15, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on April 14, 2000  
UL L-Sec 35-T17S-R34E  
Vacuum Grayburg San Andres Unit #66

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

Final Report

Name of Company <i>TERMO G &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>VACUUM GRAYBURG SAN ANDRES UNIT #66</i>	Facility Type <i>Producing well</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>L</i>	<i>35</i>	<i>17S</i>	<i>34E</i>					<i>Lea</i>

NATURE OF RELEASE

Type of Release <i>Crude oil and Produce water</i>	Volume of Release <i>30 oil - 50 water</i>	Volume Recovered <i>5 oil</i>
Source of Release <i>Poly Flowline</i>	Date and Hour of Occurrence <i>4-4-00</i>	Date and Hour of Discovery <i>4-4-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>SULVIA</i>	
By Whom? <i>Rodney Bailey</i>	Date and Hour <i>4-4-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Flowline parted - AREA consisted of top soil and caliche - Dug down to about 15 FT to will provide bottom hole sample - Hauled contaminated soil to Termo landfill.*

Describe Area Affected and Cleanup Action Taken.\*

*AFFECTED AREA 5000 sq. FT. GROUND WATER AROUND 120 FT*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	
Date: <i>4-14-00</i> Phone: <i>397-0422</i>	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*AP*

District I - (505) 393-6161  
 P. O. Box 1980  
 Hobbs, NM 88241-1980  
 District II - (505) 748-1283  
 811 South First  
 Artesia, NM 88210  
 District III - (505) 334-6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV - (505) 827-7131

**State of New Mexico**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
 2040 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827-7131

**Form C-141**  
 Originated 2/13/97

Submit 2 copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report     Final Report

Name: <u>Peraco</u>		Contact: <u>Rodney</u>
Address:		Telephone No.:
Facility Name: <u>VCBSA wt #66</u>		Facility Type: <u>397-0422</u>
Surface Owner:	Mineral Owner:	Lease No.:

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<u>N</u>	<u>35</u>	<u>17</u>	<u>34</u>					

**NATURE OF RELEASE**

Type of Release: <u>Oil/water</u>	Volume of Release: <u>3000 50BW</u>	Volume Recovered:
Source of Release:	Date and Hour of Occurrence: <u>4/4/00</u>	Date and Hour of Discovery: <u>" "</u>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <u>Lyle &amp; Dickey</u>	
By Whom?	Date and Hour: <u>4/4/00 2:45 PM</u>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse:	

If a Watercourse was impacted, Describe Fully (Attach Additional Sheets If Necessary)

**LEAK INSPECTION**  
 INSP. BY Robinson  
 INSP. DATE 4-5-2000

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)

REMARKS Pens Welding is digging up spill with backhoe

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)

Cows in area - rancher notified

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		<b>OIL CONSERVATION DIVISION</b>	
Printed Name:		Approved by District Supervisor:	Expiration Date:
Title:	Approval Date:	Conditions of Approval:	
Date:	Phone:	Attached:	<input type="checkbox"/>



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

May 15, 2000

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on April 14, 2000  
UL N-Sec 33-T24S-R38E  
West Dollarhide Drinkard Unit #73

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **The NMOCD hereby requires Texaco to demonstrate that contaminants have not and will not migrate vertically so as to cause groundwater to exceed standards. If this demonstration cannot be made, Texaco will submit to the NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days of receipt of this letter pursuant to Rule 116.D.** If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

*Donna Williams*

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report  Final Report

Name of Company <i>TEXACO E &amp; P INC.</i>	Contact <i>Rodney Bailey</i>	
Address <i>205 East Bender</i>	Telephone No. <i>505-397-0422</i>	
Facility Name <i>West Dallarhide DRINKARD Unit #73</i>	Facility Type <i>Producing well -</i>	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
<i>U</i>	<i>33</i>	<i>245</i>	<i>38E</i>					<i>Lea</i>

NATURE OF RELEASE

Type of Release <i>Produce WATER</i>	Volume of Release <i>70 bbls</i>	Volume Recovered <i>-0-</i>
Source of Release <i>TRUNK LINE</i>	Date and Hour of Occurrence <i>4-11-00</i>	Date and Hour of Discovery <i>4-11-00</i>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <i>SU2VIA</i>	
By Whom? <i>Rodney Bailey</i>	Date and Hour <i>4-14-00</i>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

*Fiber glass line broke because of surrounding rocks. Top soil about 6" the caudice -  
no other leaks in same area noted. Run down road and Pasture - AREA will be tilled -*

Describe Area Affected and Cleanup Action Taken.\*

*Affected Area 20,898 sq. ft. Ground water around 350 ft -*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

OIL CONSERVATION DIVISION

Signature: <i>Rodney Bailey</i>	Approved by District Supervisor:	
Printed Name: <i>Rodney Bailey</i>	Approval Date:	Expiration Date:
Title: <i>EHS PROFESSIONAL</i>	Conditions of Approval:	
Date: <i>4-14-00</i> Phone: <i>397-0422</i>	Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

*AP*

Hobbs, NM 88241-1980  
 District II - (505) 748-1283  
 811 South First  
 Artesia, NM 88210  
 District III - (505) 334-6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV - (505) 827-7131

Energy Minerals and Natural Resources Department  
 Oil Conservation Division  
 2040 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827-7131

FORM C-141  
 Originated 2/13/97

Submit 2 copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

B.H. DW

Release Notification and Corrective Action

OPERATOR

Initial Report     Final Report

Name: <u>Lexaco</u>		Contact: <u>Rodney</u>
Address:		Telephone No.:
Facility Name: <u>WDDWT #73</u>		Facility Type:
Surface Owner:	Mineral Owner:	Lease No.:

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	33	24	38					

min sulfide

NATURE OF RELEASE

Type of Release: <u>70</u> <del>70</del> <u>water</u>	Volume of Release: <u>70</u>	Volume Recovered: <u>0</u>
Source of Release:	Date and Hour of Occurrence: <u>4/11/00</u>	Date and Hour of Discovery:
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <u>Sylvia Duke</u>	
By Whom?	Date and Hour: <u>4/14/00</u>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse:	

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)

No Cattle

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)

Corrosion

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)

20,898'

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	<b>OIL CONSERVATION DIVISION</b>		
Printed Name:	Approved by District Supervisor:	Approval Date:	Expiration Date:
Title:	Conditions of Approval:		Attached <input checked="" type="checkbox"/>
Date:	Phone:		



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
DISTRICT 1 HOBBS
PO BOX 1880, Hobbs, NM 88241
(505) 393-6161
FAX (505) 393-0720

Jennifer A. Salisbury
CABINET SECRETARY

December 16, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 402 902 626

Mr. Rodney Bailey
Texaco Exploration & Production
205 E Bender
Hobbs, New Mexico 88240

Subject: NOTICE OF VIOLATION
UL L & ?

Re: C-141; September 22,1999: UL(E), Sec 6, T18S, R35E
C-141; September 22,1999: UL C, Sec 2, T18S, R34E
C-141; October 5,1999: UL E, Sec 31, T18S, R35E

Dear Mr. Bailey:

By letters dated November 17, 1999, Texaco Exploration & Production Company (Texaco) was required to submit corrective action plans and/or remediation plans to the New Mexico Oil Conservation Division (OCD) for the above referenced sites. Texaco's letter dated November 29, 1999 acknowledges receipt of the OCD requirement and declines to submit the required plans.

Pursuant to 19 NMAC 15.C.116.D "CORRECTIVE ACTION: The responsible person must complete Division approved corrective actions for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 ....."
Texaco is in violation of 19 NMAC 15.C.116.D for failure to submit the remediation plans for OCD approval.

Texaco must submit for OCD approval detailed corrective action or remediation plans addressing the spills at the above referenced locations by December 31, 1999. Failure to respond to this Notice of Violation will result in further enforcement action.

If you have any questions or comments, please contact me at (505) 393-6161 ext-102

Sincerely,

Chris Williams

Chris Williams
District Supervisor

cc: Lori Wrotenbery, Director
Rand Carroll, Legal Counsel

\* me & Rodney will get together & go thru Spill Reports
12-28-99 meeting w/ Tim Mill, Rodney Baile, Gary Wink, Chris Williams, Donna Willmar, Roger Anderson, Bill Olson & Wayne Price



Texaco Exploration and Production Inc

P O Box 1929  
Eunice NM 88231 1929

Date: November 29, 1999

Oil Conservation Division  
Attn: Donna Williams  
1625 N. French Drive  
Hobbs, NM 88240

Re: C141 Submitted:  
UL C-Sec 2-Ts18S-R34E  
UL E-Sec 31-Ts18S-R35E  
UL ~~E~~-Sec 6-Ts18S-R35E

Dear Ms. Williams:

In response to your letter dated November 17, 1999 addressing the above mentioned C141 reports. I can find no indication in the guidelines that an operator is required to submit a corrective action plan and/or a remediation plan for produce water spills, unless there has been an impact to surface or ground water. As a result, Texaco does not feel the NMOCD is authorized to request such a plan.

If you have additional questions please call me at 505-397-0422.

Sincerely,

Rodney Bailey  
EH&S Coordinator

*\*Under Rule 116(D) Plan*

*filed to DO SO  
then referred to  
OCD Santa Fe  
Office.*



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1990, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

November 17, 1999

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on October 5, 1999  
UL E-Sec 31-Ts18S-R35E

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **Please submit to NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days from receipt of this letter.** Please include Chlorides in the sampling activities. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505)393-6161 ext...113.

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams".

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson - Environmental Bureau Chief  
Chris Williams - District I Supervisor

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 811 Sout First  
 Artesia, NM 88210  
 District III (505) 334 - 6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

Form C-141  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Central Vacuum Unit</b>		Facility Type <b>Tank Battery</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	31	18S	35E					Lea

**NATURE OF RELEASE**

Type of Release <b>Produce Water</b>	Volume of Release <b>600 bbls</b>	Volume Recovered <b>560 bbls</b>
Source of Release <b>Main water injection lines.</b>	Date and Hour of Occurrence <b>9-25-99</b>	Date and Hour of Discovery <b>9-25-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>9-25-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

**Fiberglass line busted due to pressure surge and improper makeup. Free liquid removed.**

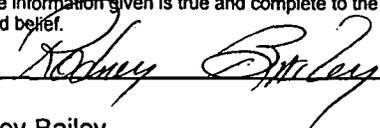
Describe Area Affected and Cleanup Action Taken. \*

**Affected area 40000 sq. ft. Ground water around 140ft.**

**Texaco request closure on this site.**

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature 	Printed Name: <b>Rodney Bailey</b>	Approved by District Supervisor	
Date:	<b>EHS Professional</b>	Approval Date:	Expiration Date
##	Phone: <b>397-0422</b>	Conditions of Approval:	Attached <input type="checkbox"/>



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

November 17, 1999

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, NM 88240

Re: C-141: Submitted on September 22, 1999  
UL C-Sec 2-Ts18S-R34E

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of the C-141 referenced above that was submitted by Texaco. Enclosed within this packet is a copy of the C-141, and a copy of the leaks and spills guidelines. **Please submit to NMOCD a corrective action plan and/or a remediation plan (using the guidelines to assist you in this matter) within 15 days from receipt of this letter.** Please include Chlorides in the sampling activities. If you have any further questions, or need any assistance please do not hesitate to write or call me at (505) 393-6161 ext...113.

Sincerely,

Donna Williams  
Environmental Engineer Specialist  
cc: Roger Anderson – Environmental Bureau Chief  
Chris Williams – District I Supervisor

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1980  
 District II (505) 748 - 1283  
 811 Sout First  
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 1000 Rio Brazos Road  
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**Santa Fe, New Mexico 87505**  
**Energy Minerals and Natural Resources Department**  
**Oil Conservation Division**  
**204 South Pacheco Street**  
**Santa Fe, New Mexico 87505**  
**(505) 827 - 7131**

**Form C-141**  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Response  Final Report

Name <b>Texaco E &amp; P Inc.</b>		Contact <b>Rodney Bailey</b>
Address <b>205 E Bender Hobbs, NM</b>		Telephone No. <b>397 - 0422</b>
Facility Name <b>Vacuum Grayburg San Andres Unit</b>		Facility Type <b>Satellite # 4</b>
Surface Owner	Mineral Owner	Lease No.

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	2	18S	34E					Lea

**NATURE OF RELEASE**

Type of Release <b>135 Produce Water</b>	Volume of Release <b>100 bbls</b>	Volume Recovered <b>80 bbls</b>
Source of Release <b>Produce Water Flow line</b>	Date and Hour of Occurrence <b>9-16-99</b>	Date and Hour of Discovery <b>9-16-99</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? <b>Sylvia</b>	
By Whom <b>Rodney Bailey</b>	Date and Hour <b>9-9-99</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully. *		
Describe Cause of Problem and Remedial Action Taken. *		
<b>External Corrosion. Free liquid was removed. No other action taken.</b>		
Describe Area Affected and Cleanup Action Taken. *		
<b>Affected area 4000 sq. ft. Ground water around 140 ft. Texaco request closure on this site.</b>		
Describe General Conditions Prevailing (Temperature, Precipitation, etc). *		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief. Signature <i>Rodney Bailey</i>		<b>OIL CONSERVATION DIVISION</b>	
Printed Name: <b>Rodney Bailey</b>		Approved by District Supervisor	
Title: <b>EHS Professional</b>		Approval Date:	Expiration Date:
Date: <b>9-22-99</b>	Phone: <b>397-0422</b>	Conditions of Approval:	Attached <input type="checkbox"/>



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191

Date: August 30, 1999

New Mexico Energy, Minerals & Natural resources Department  
Donna Williams  
Environmental Engineer Specialist  
1625 N. French Drive  
Hobbs, NM 88240

In response to your letter dated August 18, 1999 attached is a copy of the J & L Landfarm authorization of disposal of contaminated soil and a copy of the lab analysis showing the vertical extent of chlorides. The analysis shows sample ID #1, which is a background sample taken in the area, and sample ID #2 is a sample taken in the spill area at a depth of 3ft.

If additional information is needed please call me at 505-397-0422.

Sincerely

Rodney Bailey  
SH&E Coordinator  
Texaco



# J & L LANDFARM, INC.

P.O. BOX 356  
HOBBS, NEW MEXICO 88241-0356  
PHONE (505) 393-9697 • PERMIT # NM-01-0023

0103

Generator/Company Japaco E & P.

Authorized Representative Rodney Bailey

Originating Site Central Vacuum Unit (Satellite #6)

Transporter Walton Const. Co.

Authorized Representative Shelby Legaria

Brief Description of Material Non-Hazardous (Oily Dirt)

Estimated Volume 72 Yds.

TPH

BE-TEX

CERTIFICATE OF CHEMICAL ANALYSIS (if required) \_\_\_\_\_

Julius L. Roberts  
FACILITY AUTHORIZED REPRESENTATIVE

8-24-99  
DATE

08/25/99  
EAP  
0645



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

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

ANALYTICAL RESULTS FOR  
TEXACO EXPLORATION & PRODUCTION  
ATTN: RODNEY BAILEY  
205 E. BENDER  
HOBBS, NM 88240  
FAX TO:

Receiving Date: 08/24/99  
Reporting Date: 08/24/99  
Project Number: NOT GIVEN  
Project Name: NOT GIVEN  
Project Location: CVU SATELLITE #6

Analysis Date: 08/24/99  
Sampling Date: 08/24/99  
Sample Type: SOIL  
Sample Condition: INTACT  
Sample Received By: GP  
Analyzed By: AH

LAB NUMBER	SAMPLE ID	Cl <sup>-</sup> (mg/L)
H4297-1	#1	276
H4297-2	#2	162
Quality Control		1014
True Value QC		1000
% Recovery		101
Relative Percent Difference		4.7

METHOD: Standard Methods      4500-Cl<sup>-</sup>B

Note: Analysis performed on 1:4 w:v aqueous extract.

  
Chemist

08/24/99  
Date

H4297.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

August 18, 1999

Texaco E & P Inc.  
Attn: Rodney Bailey  
205 E. Bender  
Hobbs, New Mexico 88240

Re: UL L-Sec 6-Ts18S-R35E

Dear Mr. Bailey

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Texaco's Corrective Action Plan dated 8-9-99. The Corrective Action Plan was deficient and requires some clarification. **Please submit to NMOCD by September 1, 1999 the following:**

1. A verification/clarification of disposal activities of contaminated soil.
2. Determine vertical extent of Chlorides.

If you have any further questions, or need any assistance please do not hesitate to write or call me at (505-393-6161 ext...113).

Sincerely,

A handwritten signature in cursive script that reads "Donna Williams". The first letter "D" is circled.

Donna Williams  
Environmental Engineer Specialist  
Cc: Wayne Price; Chris Williams;



Texaco E & P

205 E. Bender Blvd.  
Hobbs NM 88240  
505 393 7191

Date: 8-9-99

Donna Williams  
Environmental Engineer Specialist  
Oil Conservation Division  
Hobbs NM 88240

Re: Corrective Action Plan  
UL L - Sec 6-T18S-R35E

In response to the letter dated August 2, 1999, Texaco submits the following corrective action plan for the clean up of the leak occurring at the Buckeye Central Vacuum Unit Satellite # 6. (Sec 6-T18S-35E).

Free liquid was removed from the site. 50 bbls of oil and 100 bbls of water. The contaminated soil was removed from depths of 6" to 10". Bottom hole was tested for DRO, GRO and Chlorides. Lab analysis from Cardinal Lab, attached, stated DRO is 123 ppm, GRO is less than 50 ppm with the chlorides at 19,923 ppm. Contaminated soil was removed from the location and clean soil was hauled into the site and mixed with the remaining soil.

Ground water in this area is at depths of 130ft. to 140ft. TPH, according to the NMOCD <sup>-79-103'</sup> guidelines, is within range for closure with ground water at this depth. Texaco request closure on this site.

Sincerely,

Rodney Bailey  
SH&E Coordinator  
Hobbs Operating Unit

No Response

requested  
vertical  
on CI-  
on 8-18-99



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

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

ANALYTICAL RESULTS FOR  
 TEXACO EXPLORATION & PRODUCTION  
 ATTN: RODNEY BAILEY  
 205 E. BENDER  
 HOBBS, NM 88240  
 FAX TO:

Receiving Date: 08/05/99  
 Reporting Date: 08/06/99  
 Project Owner: TEXACO  
 Project Name: CVU SAT #6  
 Project Location: NOT GIVEN

Sampling Date: 08/05/99  
 Sample Type: SOIL  
 Sample Condition: COOL & INTACT  
 Sample Received By: AH  
 Analyzed By: BC/AH

LAB NUMBER	SAMPLE ID	GRO (C <sub>6</sub> -C <sub>10</sub> ) (mg/Kg)	DRO (>C <sub>10</sub> -C <sub>28</sub> ) (mg/Kg)	Cl <sup>-</sup> (mg/Kg)
ANALYSIS DATE		08/05/99	08/05/99	08/05/99
H4264-1	DIRT SAMPLE	<50	123	19900
Quality Control		677	713	966
True Value QC		800	800	1000
% Recovery		84.6	89.1	96.6
Relative Percent Difference		1.5	0.9	5.2

METHODS: TPH GRO & DRO: EPA SW-846 8015 M; Cl<sup>-</sup>: Std. Methods 4500-Cl<sup>-</sup>B

*Bryson J. Cooke*  
 Chemist

*8/6/99*  
 Date

H4264.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

District I (505) 393 - 6161  
 P.O. Box 1940  
 Hobbs, NM 88241-1960  
 District II (505) 748 - 1283  
 811 Sout First  
 Artesia, NM 88210  
 District III (505) 334 - 6178  
 1000 Rio Brazos Road  
 Aztec, NM 87410  
 District IV (505) 827 - 7131

Santa Fe, New Mexico 87505  
 Energy Minerals and Natural Resources Department  
 Oil Conservation Division  
 204 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827 - 7131

Form C-141  
 Originated 2/13/97

Submitted 2 Copies to  
 Appropriate District  
 Office in accordance  
 with Rule 116 on  
 back side of form

Release Notification and Corrective Action

OPERATOR

Initial Response  Final Report

Name Texaco E & P Inc.		Contact Rodney Bailey
Address 205 E Bender Hobbs, NM		Telephone No. 397 - 0422
Facility Name Central Vacuum Unit		Facility Type Satellite # 6
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Grid Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
L	6	18S	35E					Lea

~ 103'

NATURE OF RELEASE

Type of Release Crude Oil and Produce Water	Volume of Release 75 oil, 125 water	Volume Recovered 50 oil, 100 water
Source of Release Trunk Line from Satellite	Date and Hour of Occurrence 7-26-99	Date and Hour of Discovery 7-26-99
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, to Whom? Sylvia	
By Whom Rodney Bailey	Date and Hour 7-26-99	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully. \*

Describe Cause of Problem and Remedial Action Taken. \*

Transite line Crushed by vehicle. Removed free liquid. Contaminated dirt will be removed.

Describe Area Affected and Cleanup Action Taken. \*

Affected area 4500 sq. ft. Vertical extent less than 1 ft.. Site closed.

Describe General Conditions Prevailing (Temperature, Precipitation, etc). \*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any federal, state, or local laws and/or regulations.

I hereby certify the information given is true and complete to the best of my knowledge and belief.		<b>OIL CONSERVATION DIVISION</b>	
Signature <i>Rodney Bailey</i>	Printed Name: Rodney Bailey	Approved by <i>Donna Williams</i> District Supervisor <i>Environ. Eng. Specialist</i>	
Title: EHS Professional	Date: 7-29-99	Approval Date: 01-18-00	Expiration Date
Phone: 397-0422	Conditions of Approval:		Attached <input type="checkbox"/>





Texaco Exploration  
and Production Inc

500 North Loraine  
Midland TX 79701

P O Box 3109  
Midland TX 79702

November 16, 1999

Mr. Chris Williams  
District I Supervisor  
New Mexico Oil Conservation Division  
P. O. Box 1980  
Hobbs, New Mexico 88241

RE: GOV - STATE AND LOCAL  
SAM COOPER RANCH REMEDIATION

Dear Mr. Williams:

Please refer to your letter (copy attached), above subject, dated October 26, 1999 to Mr. Rodney Bailey of Texaco's office in Hobbs, New Mexico. As I have been working with the two NMOGA Environmental Affairs Subcommittees on TPH and Chlorides, the letter was forwarded to me for consideration along those lines.

I have reviewed the regulations associated with the oilfield site remediation and discussed this issue with a number of other companies. It is understood that during a site remediation project, any non-exempt, non-hazardous oilfield wastes taken from the site must be covered by an approved NMOCD Form C-138. Additionally, soil that is contaminated by RCRA exempt streams are exempt from the requirements of an approved NMOCD Form C-138. However, we can find no indication in the regulations that an operator is required to submit and receive approval of a site investigation and remediation plan unless there has been an impact to surface or ground water. The issue of remediation of such a site is an issue to be handled with the landowner.

As a result, we do not feel that NMOCD is authorized to require an operator to submit a site investigation and/or a remediation plan for site cleanups unless surface or ground water has been impacted. We would welcome the opportunity to discuss this issue with you and your staff. Preferably, since this is an issue for many operators, it would be a good idea to discuss the issue with a representative group of NMOGA members such as the TPH and Chlorides Subcommittees. Please let me know if such a meeting would be acceptable and when it might be convenient to meet.

Yours respectfully,

R. F. (Frank) Gray  
Regulatory Compliance Manager

RFG/s

NMOGA - TPH and Chloride Workgroups  
TGM, RGB

Chrono-File



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

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-8181  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

October 26, 1999

**CERTIFIED MAIL Z 402 901 814  
RETURN RECEIPT REQUESTED**

Mr. Rodney Bailey  
Texaco E&P Inc.  
205 E. Bender  
Hobbs, New Mexico 88240

Re: Sam Cooper Ranch Remediation Projects

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) became aware of Texaco's remediation project for the above captioned site. NMOCD Environmental Bureau Representatives, Donna Williams and Wayne Price, visited the site on October 25, 1999, and observed remediation activities and oilfield waste being disposed of off-site without NMOCD approval. As of this date, the NMOCD has not received nor approved of Texaco's cleanup activities. Please submit for NMOCD approval a site investigation and remediation plan for the above captioned site.

NMOCD hereby requires Texaco to submit a site investigation and/or a remediation plan(s) for any future sites and/or cleanup projects.

Sincerely,

Chris Williams  
District I Supervisor

cc: Roger Anderson



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
DISTRICT I HOBBS  
PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

April 15, 1999

Mr. Rodney Bailey  
Texaco E&P Inc.  
205 E. Bender  
Hobbs, New Mexico 88240

Re: C-141's

Dear Mr. Bailey:

New Mexico Oil Conservation Division (NMOCD) visited with you per telephone conversation on April 13, 1999. The conversation was about the C-141's submitted to District I. These C-141's cannot be completed as they are. There is missing information, such as no analytical data to back up the closing of the sites remediation process. Also there are no bottom hole samples taken to prove that levels were met. Site assessments need to be performed and samples taken to show the levels of contamination. All of this information was discussed during our telephone conversation on the 13<sup>th</sup>.

Upon your returning on the 26<sup>th</sup> please set up a time to meet with me at your earliest convenience. For your convenience and if there is any further information needed please call at (505-393-6161....ext..113).

Sincerely,

Donna Williams

Environmental Engineer

Cc: Wayne Price; Chris Williams;

## Williams, Chris

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**From:** Wrotenbery, Lori  
**Sent:** Tuesday, July 20, 1999 5:53 PM  
**To:** Anderson, Roger; Stogner, Michael  
**Cc:** Williams, Chris; Salisbury, Jennifer; 'William F. Carr'; Carroll, Rand; Davidson, Florene  
**Subject:** RE: Lee Land Disposal Facility

Thanks, Mike. I have an appointment Monday morning to discuss this matter with Bill Carr, who is representing Ken Marsh.

-----  
**From:** Stogner, Michael  
**Sent:** Tuesday, July 20, 1999 2:42 PM  
**To:** Wrotenbery, Lori; Anderson, Roger  
**Cc:** Williams, Chris; Salisbury, Jennifer; 'William F. Carr'; Carroll, Rand; Davidson, Florene  
**Subject:** Lee Land Disposal Facility

Today at 2:00 p.m. Mr. Ken Marsh in Hobbs at (505) 393-1079 called to report on alleged illegal dumping (by Texaco) of oilfield waste (not specified) into a facility that is not authorized to take such waste (Lee Land). I understand from our conversation that he has submitted correspondence concerning this matter to Mr. Anderson, Ms. Wrotenbery, and Ms. Salisbury, therefore I am assuming each of you are familiar with Mr. Marsh's concerns.

He also voiced his opinion and concern about the lack of action by the State's Environmental Department in this matter. He also informed me that he had been trying to get through to someone in this office for 55 minutes today before being transferred to me (Acting Director), however he was not specific when I asked him to give me more details about the numbers called and the voice mail messages left.

I assured him that the Division was aware of his concerns and is taking appropriate action. I assured him that Ms. Wrotenbery would return his call upon her return from an environmental conference.



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
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PO BOX 1980, Hobbs, NM 88241  
(505) 393-6161  
FAX (505) 393-0720

Jennifer A. Salisbury  
CABINET SECRETARY

October 26, 1999

**CERTIFIED MAIL Z 402 901 814  
RETURN RECEIPT REQUESTED**

Mr. Rodney Bailey  
Texaco E&P Inc.  
205 E. Bender  
Hobbs, New Mexico 88240

Re: Sam Cooper Ranch Remediation Projects

Dear Mr. Bailey:

The New Mexico Oil Conservation Division (NMOCD) became aware of Texaco's remediation project for the above captioned site. NMOCD Environmental Bureau Representatives, Donna Williams and Wayne Price, visited the site on October 25, 1999, and observed remediation activities and oilfield waste being disposed of off-site without NMOCD approval. As of this date, the NMOCD has not received nor approved of Texaco's cleanup activities. Please submit for NMOCD approval a site investigation and remediation plan for the above captioned site.

NMOCD hereby requires Texaco to submit a site investigation and/or a remediation plan(s) for any future sites and/or cleanup projects.

Sincerely,

A handwritten signature in cursive script that reads "Chris Williams".

Chris Williams  
District I Supervisor

cc: Roger Anderson

Site Names	Un Letter	Sec	Range	Date-Occur.	Date-Discov.	released	recovered	Imp.grd-H2O	open/closed	depth to grd-water
V. GLORIETTA #45	D	36	34	1/20/2000	1/20/2000	20	0	no	open	123
V. GLORIETTA #107	B	1	34	1/22/2000	1/22/2000	20	0	no	open	123
GSA UNIT #150	G	1	34	1/29/2000	1/29/2000	10	0	no	open	123
GSA UNIT #55	K	1	34	2/9/2000	2/9/2000	5	0	no	open	123
CO. JAL UNIT #125	G	24	36	1/25/2000	1/25/2000	15	12	no	open	101-146
CO. JAL UNIT #122	A	24	36	3/16/2000	3/16/2000	20	17	no	open	145
CO. JAL UNIT #238	E	25	36	2/15/2000	2/15/2000	24	23	no	open	101-146
W.D.D. UNIT #105	K	32	38	2/3/2000	2/3/2000	13	0	no	open	58
HARRISON "B" #1	C	9	37	4/8/2000	4/8/2000	12	0	no	closed	65-87
THESE I HAVE CLOSED DUE TO THE SIZE OF THE SPILL.										
CV UNIT #77	I	36	34	3/2/2000	3/2/2000	85	65	no	open	123
Abo Batt	A	7	31	1/30/2000	1/30/2000	55	50	no	open	200-400
GSA UNIT #33	E	1	34	2/17/2000	2/17/2000	48	0	no	open	123
GSA UNIT #15	K	2	34	1/28/2000	1/28/2000	90	80	no	open	135
GSA UNIT	C	2	34	2/22/2000	2/22/2000	75	50	no	open	98-140
W. V UNIT #58	G	3	34	2/23/2000	2/23/2000	320	310	no	open	98-140
CV UNIT (WIS)	E	31	35	2/15/2000	2/15/2000	450	400	no	open	72
CO. JAL UNIT #220	M	19	37	2/5/2000	2/5/2000	140	130	no	open	117
<p>GENERIC LETTERS WENT OUT ON APRIL 20, 2000. RODNEY BAILEY CALLED ON 05-02-00 STATED HE GATHER ALL INFORMATION I WANTED AND SUBMIT IT TO THE OCD. STILL NOTHING. RODNEY CALLED 05-16-00 AT 1:30p.m. STATED HE IS STILL WORKING ON GATHERING SAMPLES</p>										
W.D.D. UNIT #73	N	33	38	4/1/2000	4/1/2000	70	0	no	open	300 ^
GSA UNIT #66	L	35	34	4/4/2000	4/4/2000	80	5	no	open	87-125
<p>GENERIC SPILL LETTERS WENT OUT ON 5-16-00. STILL NOTHING</p>										
CV UNIT #7	B	30	35	12/17/1999	12/17/1999	40	0	no	open	76-95
<p>SENT A GENERIC LETTER OUT ON MARCH 2, 2000. STILL NOTHING</p>										
GSA W. STATION	C	2	34	4/7/2000	4/1/2000	50	0	no	open	98-135
<p>IS IN VIOLATION ACCORDING TO RULE 116-DID NOT REPORT YET- I WILL CHECK ON THIS ONE AGAIN TO BE SURE</p>										
VM HENDERSON	H	30	37	5/2/2000	5/2/2000	40	20	no	open	99-108
CVSAT #5	F	6	35	4/20/2000	4/20/2000	35	30	no	open	79-103
<p>CALLED RODNEY TO LET HIM KNOW I HAVE NOT RECEIVED THE C-141'S YET I DID RECEIVE THEM THAT AFTERNOON 05-17-00 / LETTERS WILL GO OUT SOON</p>										
W.D.D. UNIT #84	H	5	38	5/3/2000	5/3/2000	50	45	no	open	93
CVUNIT #30	K	30	35	4/24/2000	4/24/2000	30	0	no	open	76-95
<p>IN 2 DAYS WILL BE VIOLATION ACCORDING TO RULE 116-NOT REPORTING I DID RECEIVE THESE THE AFTERNOON OF 05-17-00 / LETTERS WILL GO OUT SOON</p>										

RODNEY BAILEY HAD VISITED WITH ME AND MARTYNE KIELING ON OR AROUND APRIL 13TH, 2000,  
RODNEY SAID WHILE CLEANING UP A SPILL, UPON EXCAVATION OIL WAS COMING IN OUT OF THE WALLS OF THE EXCAVATION.

I THEN CALLED AROUND A WEEK TO A WEEK AND A HALF LATER ASKING TO SEE THE SITE. HE STATED IT WAS CLOSED, FINISHED.

I ASKED FOR A CLOSURE REPORT - FROM THE ADVICE OF SANTA FE.  
HE SAID SURE I WILL HAVE IT RIGHT TO YOU. STILL NOTHING.

IN DECEMBER 1999 I SIGNED OFF ON SOME 400 C-141'S UNDER THE ASSUMPTION TEXACO  
WOULD PERFORM ANY AND ALL ANALYSIS NEEDED FOR THE REMAINDER 10 - PER OCD IN HOBBS  
RODNEY INFORMED ME THAT TEXACO HAS DECIDED TO DO NOTHING WITH THESE C-141'S  
THEY HAVE AND STILL ARE REFUSING TO COMPLY WITH OCD

TEXACO RELEASE REPORT  
 CREATED 1999

UNIT LETTER	SECTION	TOWNSHIP	RANGE	VOLUME OF RELEASE	VOLUME RECOVERED	DATE OF MISHAP
F	13	20S	37E	209/O	0	8/19/1997
O	1	24S	36E	20W	0	10/8/1998
B	1	18S	34E	200W	180W	10/11/1998
B	11	17S	31E	7/O	0	10/19/1998
F	6	18S	35E	1/O - 6W	5W	10/22/1998
M	33	25S	38E	10/O - 35W	5/O - 30W	10/22/1998
C	2	18S	34E	400W	50W	10/28/1998
B	31	24S	38E	75W	0	10/28/1998
N	31	17S	35E	250W	100W	11/4/1998
L	6	18S	35E	10/O - 30W	10/O - 25W	11/4/1998
C	17	31S	35E	2/O - 40W	2/O - 10W	11/4/1998
K	33	17S	34E	1/O - 500W	340W	11/6/1998
P	36	17S	34E	80W	70W	11/9/1998
H	24	24S	36E	2/O - 18W	1/O - 9W	11/9/1998
F	6	24S	37E	130W	100W	11/9/1998
B	5	24S	38E	15W	0	11/9/1998
L	6	18S	35E	20W	19W	11/16/1998
K	32	25S	38E	25W	0	11/25/1998
L	1	18S	34E	50W	10W	12/6/1998
B	30	17S	35E	150W	50W	12/11/1998
F	32	24S	38E	22W	0	12/19/1998
N	4	23S	37E	65/O	15/O	12/20/1998
O	25	17S	34E	4/O - 8W	1/O - 2W	12/22/1998
D	27	17S	34E	100/O - 30W	96/O - 20W	12/22/1998
A	3	24S	36E	173/O - 600W	160/O - 520W	12/26/1998
O	6	24S	37E	30W	0	12/27/1998
I	33	17S	34E	200W	150W	1/7/1999
H	5	23S	37E	400W	0	1/7/1999
L	2	18S	34E	6/O - 40W	1/O - 19W	1/8/1999
A	12	18S	34E	8/O - 1W	5/O	1/8/1999
G	36	17S	34E	168W	160W	1/10/1999
H	5	25S	38E	200W	130W	1/12/1999
K	32	25S	38E	20W	0	1/12/1999
N	32	25S	38E	4/O - 10W	0	1/14/1999
J	6	18S	35E	20/O - 70W	10/O - 40W	1/15/1999
N	25	17S	34E	10W	9W	1/17/1999

TEXACO RELEASE REPORT  
 CREATED 1999

E	32	24S	38E	9/O - 1W	0	1/29/1999
N	1	18S	34E	100W	20W	2/5/1999
N	1	18S	34E	10/O - 40W	35W	2/5/1999
C	9	23S	37E	5/O - 10W	0	2/7/1999
F	6	18S	35E	60W	40W	2/12/1999
B	1	18S	34E	15W	12W	2/13/1999
C	2	18S	34E	15W	12W	2/15/1999
D	32	24S	38E	30W	0	3/8/1999
K	8	22S	37E	35/O - 10W	15/O - 5W	3/11/1999
K	32	25S	38E	8W	0	3/14/1999
K	36	17S	34E	5W	0	3/15/1999
G	36	17S	34E	100W	90W	4/2/1999
D	35	24S	37E	1/O - 100W	1/O - 25W	4/10/1999
C	36	17S	34E	1/O - 69W	.5/O - 60W	4/12/1999
J	2	18S	34E	20W	0	4/17/1999
N	1	18S	34E	200W	71W	4/18/1999
C	36	17S	34E	10W	0	4/26/1999
B	18	24S	37E	150W	60W	4/26/1999
	1	18S	34E	5W	0	4/28/1999
M	25	17S	34E	80W	70W	5/14/1999
M	35	17S	34E	5W	0	5/14/1999
C	36	17S	34E	90W	85W	5/15/1999
B	1	18S	34E	13W	10W	5/15/1999
J	2	18S	34E	10W	0	5/16/1999
D	33	24S	38E	3/O - 10W	0	5/19/1999
M	12	20S	37E	365/O - 150W	330/O - 100W	5/22/1999
M	12	20S	37E	3/O - 15W	0	5/24/1999
B	5	25S	38E	10W	0	5/27/1999
M	33	25S	38E	8W	0	5/27/1999
L	33	24S	38E	5/O - 10W	0	5/30/1999
I	36		34E	20W	20W	5/31/1999
L	33	24S	38E	20W	0	6/1/1999
B	1	18S	34E	5W	0	6/2/1999
G	30	17S	35E	6W	0	6/12/1999
F	6	18S	35E	30W	15W	6/15/1999
P	36	17S	34E	8W	0	6/16/1999
D	4	25S	38E	6W	0	6/25/1999

TEXACO RELEASE REPORT  
 CREATED 1999

C	9	23S	37E	1/O - 9/W	6/W	6/26/1999
O	34	17S	34E	1/O - 59/W	50/W	6/27/1999
C	9	23S	37E	50/W	0	6/29/1999
C	9	23S	37E	1/O - 9/W	5/W	6/30/1999