

YATES DRILLING COMPANY

105 SOUTH FOURTH STREET • ARTESIA, NEW MEXICO 88210 (505) 748-8440 • FAX (505) 748-8470 EMAIL: ydc1@gwest.net

PEYTON YATES
PRESIDENT

S. P. YATES VICE PRESIDENT

RANDY G. PATTERSON SECRETARY

> DENNIS G. KINSEY TREASURER

August 23, 2005



Mr. Mike Bratcher Oil Conservation Division 1301 W Grand Avenue Artesia, NM 88210

RE: Pecos River Deep Unit 12 API 30-015-33942

Dear Mr. Bratcher:

Yates Drilling Company submitted a C-144 for the closure of the drilling pit for the Pecos River Deep Unit 12 on August 2, 2005. The form was returned with the notation that the form could not be processed due to conflicting information between the registration which stated site ranking as 30 points and the closure which stated site ranking as 10 points.

The discrepancy between the registration and the closure C-144 is due to an error on the registration. When locating information on wellhead protection, registration noted that there is a two foot deep buried water pipeline and ranked it as a wellhead protection area assigning 20 points. However, after our discussion and research, we have determined that a fresh water pipeline is not considered as a 'other' water source.

Therefore, Yates Drilling Company respectfully requests the closure C-144 ranking score remain at 10 points allowing for encapsulation of the drilling pit.

As always, we are committed to highest standards in closure proceedings.

Sincerely,

mile Stillfill

Mike Stubblefield Environmental Regulatory Agent District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

For drilling and production facilities, submit to appropriate NMOCD District Office.

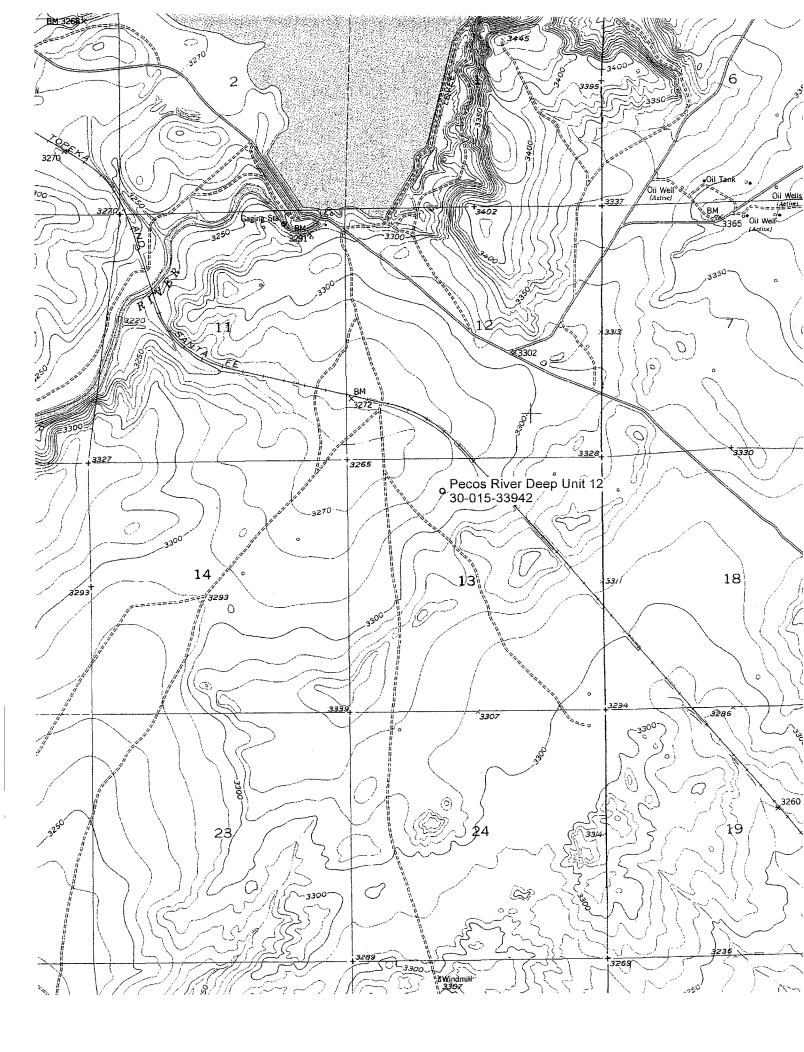
For downstream facilities, submit to Santa Fe office

Form C-144

June 1, 2004

Pit or Below-Grade Tank Registration or Closure
Is pit or below-grade tank covered by a "general plan"? Yes X No
Type of action: Registration of a pit or below-grade tank \(\subseteq\) Closure of a pit or below-grade tank \(\subseteq\)

Operator: Yates Drilling Company Telephone: 505-748-4500 e-mail add Address: 105 South 4 th Street, Artesia, N.M. 88210 Facility or well name: Pecos River Deep Unit 12 API #: 30-015-33942 U/L o	RECEIVED				
County: Eddy Latitude 32.57881 Longitude 10 Surface Owner: Federal X State Private Indian	AUG 2 4 2005				
Pit Type: Drilling X Production Disposal Work over Emergency Lined X Unlined Liner type: Synthetic X Thickness 12 mil Clay Pit Volume 20,000 bbl	Below-grade tank Volume:bbl Type of fluid: Construction material: Double-walled, with leak detection? Yes If not, explain why not.				
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more	(20 points) (10 points) XXXX (0 points)			
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No	(20 points) (0 points) XXXX			
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more	(20 points) (10 points) (0 points) XXXX			
	Ranking Score (Total Points)	10 POINTS			
If this is a pit closure: (1) Attach a diagram of the facility showing the pit's relaburying in place) onsite offsite offsite. If offsite, name of facility NA diate. (4) Groundwater encountered: No very Yes for If yes, show depth below grows (5) Attach soil sample results and a diagram of sample locations and excavations. Additional Comments: Closure work plan for drilling pit. The drilling pit contents Synthetic liner on former drilling pit site. Drilling pit contents will then be empton a min. of a 3' over lap of the underlying trench areas. The encapsulation trench hour notice will be provided to the Oil Conservation Division before pit closure. Pit Closure actions to begin by NA. Ending date NA	. (3) Attach a general description of removed the count surfaceft, and attach sample removed the surfaceft. Encape the contents in the encapsulation trench. A 20 mil. Synthese will then be backfilled back to grade using a minuser of the encapsulation trench.	edial action taken including remediation start date and e esults. sulation trench will be excavated and lined with a 12 m thetic liner will then be placed over the pit contents with			
I hereby certify that the information above is true and complete to the best of m been/will be constructed or closed according to NMOCD guidelines, a general description of the constructed or closed according to NMOCD guidelines, a general description of the construction of	general permit , or an (attached) alternative (Signature	OCD-approved plan			



	New Mexico Q Well Rep	ffice of the Sta orts and Dow	nte Engineer nloads	cos RIVE	R DEEP CLUIT 12
Township: 20S	Range: 26E	Sections:	•		
NAD27 X:	Y: ,	Zone:	Search	Radius:	
County:	Basin:	2.1 	Number:	Suffix	ς:
Owner Name: (First)	(La	st) ② All	○Non	n-Domestic	ODomestic
Well / Su	rface Data Report Wate Clear Form	er Column Repo		er Report)

AVERAGE DEPTH OF WATER REPORT 08/01/2005

								(Depth	water in	reet)
Bsn	Tws	Rng	Sec	Zone	X	Y	Wells	Min	Max	Avg
С	20S	26E	34				1	135	135	135
С	20S	26E	35				5	31	52	44
С	20S	26E	36				1	135	135	135
RA	20S	26E	05				1	20	20	20
RA	20S	26E	06				1	65	65	65
RA	20S	26E	07				4	60	97	79
RA	20S	26E	80				3	35	69	46
RA	20S	26E	11				1	49	49	49
RA	20S	26E	17				1	47	47	47
RA	20S	26E	23				2	22	105	64
RA	20S	26E	30				1	190	190	190

Record Count: 21