

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

12-Dec-05

30-015-05398

Hudson Oil Company of Texas 616 Texas Street Fort Worth, TX 76102-4696

REMEDIATION WORK: PUCKETT B NUMBER 8, 16, 25 AND 34

A field review of the remediation work conducted on the referenced wells is approved, the violation cases have been closed. OCD Rule 19.15.3.116.D [NMAC] requires that the responsible person for a release must complete division approved corrective action and that releases will be addressed in accordance with a remediation plan submitted to and approved by the division. This rule does not preclude the responsible person from taking appropriate actions to mitigate the impact of or contain a release prior to OCD approval but does require that site remediation activities be approved by the OCD.

Future remediation work will require submission of a site ranking and potentially a remediation work plan (as was requested in the original letter on these wells). To provide you with approval for corrective actions the OCD District 2 Office must <u>first</u> receive a remediation work plan that addresses, at a minimum, the following:

- Site characterization, ranking, layout, and remediation action levels and to what levels remediation work will target at each phase (i.e. excavation, land farming, tilling);
- Release characterization including source, cause, prevention of future release, volumetric estimation of impacted area(s) and contaminant specific concerns;
- On site method of remediation including specific procedures for moisture/nutrients/additives to enhance biodegradation of the contaminants, specific to Highly Contaminated/Saturated Soils and Unsaturated Contaminated Soils (as applicable);
- Off site remediation including sampling procedures for removed material, disposition of materials and documentation required (as applicable);
- Notification to NMOCD of work/sampling and sampling procedures to be used for site characterization and final closure;
- General schedule of work to be performed including periodicity of repeated work such as tilling/moisture, etc;
 and.
- Site closure procedures (closure of excavations, reseeding, grading, etc).

The OCD District 2 Office uses the "Guidelines For Remediation of Leaks, Spills, and Releases" to evaluate the adequacy of all remediation work plans submitted for approval. This guide may be found on our web site at: http://www.emnrd.state.nm.us/emnrd/ocd/EH-MiscGuidelines.htm.

Thank you for your prompt attention to this matter and your efforts in helping to protect our environment and the infrastructure of the oil and gas industry.

Artesia OCD District Office

HUDSON OIL COMPANY OF TEXAS

616 TEXAS STREET

FORT WORTH, TEXAS 78102-4696

EDWARD R. HUDSON, JR. WILLIAM A. HUDSON II E. RANDALL HUDSON III

November 11, 2005

817.336.7109 FAX 817.334.0442

Mike Bratcher Oil Conservation Division 1301 W. Grand Artesia, New Mexico 88210

RECEIVED

NOV 1 4 2005

OUU-MATERIA

RE: Notice of Violation – Inspection

Puckett B No. 8 30-015-05398-00-00 Puckett B No. 16 30-015-05406-00-00 Puckett B No. 25 30-015-22208-00-00 Puckett B No. 34 30-015-28597-00-00

Dear Mike:

Please find enclosed Release Notification and Corrective Action forms for the referenced wells which have been brought into compliance.

Please do not hesitate to call me or Jon Smith in our Maljamar office at (505) 676-2266 should you have any questions or need additional information.

Sincerely,

E. Randall Hudson III

ERHIII/sb

Enclosures

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

Form C-141 Revised October 10, 2003

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

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Release Notification and Corrective Action

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						OPERA?			☐ Initia	al Report	Final Report
									ison II	I	
Address 616 Texas Street Telephone No. (817) 336-											
Facility Nar	ne P	uckett E	#8		I	acility Typ	e Pumpino	g Wei	L1		
Surface Owner Federal Mineral Owner Federal Lease No. IC - 029415-B								029415 - B			
LOCATION OF RELEASE											
Unit Letter	Section	Township	Range	Feet from the	North/S	South Line	Feet from the	East/\	West Line	County	
С	25	17	31	660	No	orth	1980	West		Eddy	
LatitudeLongitude											
NATURE OF RELEASE											
		and Pro	duced	Water		Volume of		ols		Recovered	none
Source of Re							lour of Occurrence	<u>e</u>	Date and	Hour of Disc	overy
Was Immedia	ate Notice (Yes [] No 🏧 Not Rec	quired	If YES, To	Whom?				
By Whom?						Date and H	lour			·	
Was a Water	course Read		~	*		If YES, Vo	lume Impacting t	he Wat	ercourse.		
☐ Yes 🏧 No									_		
If a Watercou	ırse was Im	pacted, Descri	ibe Fully.	•						F	SECEINED
										Ī	NOV 1 4 2005
OCD-ARTESIA											
Describe Cau								- /			
Flowline leak due to corrosion.											
Flowlin	ne has	been rep	laced	with new p	olyp:	ipe.					
Describe Are	a Affected	and Cleanup A	Action Tal	^{(en.*} on — sandy (2202	trac tun	mod un wit	-h h=	akhoo	and thou	n covered
				n — sandy 1 was clean							.i covered
with Ci	Lean Sa	ua – wer	I nead	i was clean	eu u	p - puc	III liew car	LICIE	and 9	raver.	
I hereby certi	fy that the i	nformation gi	ven above	is true and comple	ete to th	e hest of my	knowledge and in	ndersta	nd that nurs	uant to NMC	CD rules and
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.											
reuerar, state,	Of local law	ws and or regu	nations.				OIL CONS	SERV	ΔΤΙΩΝ	DIVISIO	N
							OIL COIN	<u>JLIC V</u>	AHON	DIVIDIO	1
Signature:						TIM GUM					
Printed Name	andall H	ndall Hudson III			Approved by District Supervisor:			by MB My Lunana			
Title:	Vice	Preside	nt			Approval Dat	e: 12/4/05	_	Expiration 1	Date: N/	4
E-mail Addre		***************************************					* * * * * * * * * * * * * * * * * * * *				
					Conditions of Approval:						
Date: 11-	-11-05		Phone	817-336-71	09					1	

* Attach Additional Sheets If Necessary