



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

30-015-05406

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 first 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 76102-4696

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 14 2005

OCU-ARTESIA

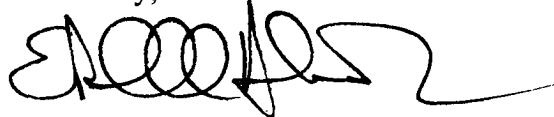
RE: Notice of Violation – Inspection
Puckett B No. 8 30-015-05398-00-00
Puckett B No. 16 30-015-05406-00-00
Puckett B No. 25 30-015-22208-00-00
Puckett B No. 34 30-015-28597-00-00

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

30-015-05406

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company	Hudson Oil Company of Texas	Contact	E. Randall Hudson III
Address	616 Texas Street	Telephone No.	(817) 336-7109
Facility Name	Puckett B Tank Btty & B #16	Facility Type	Tank Battery
Surface Owner	Federal	Mineral Owner	Federal
		Lease No.	LC-029415-B

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
FF	25	17	31	1980	North	1980	West	Eddy

Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release	Oil	Volume of Release	3 bbls	Volume Recovered	None
Source of Release	Storage Tank	Date and Hour of Occurrence		Date and Hour of Discovery	
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.*

RECEIVED

NOV 14 2005

UDD-ARTESIA

Describe Cause of Problem and Remedial Action Taken.*

Tank overflow due to transfer of oil
No repair was required

Describe Area Affected and Cleanup Action Taken.*

Sand and caliche inside battery yard and tank firewall.
Worked soil with backhoe then covered with new caliche and gravel.

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:



Printed Name: E. Randall Hudson III

Approved by District Supervisor:

TIM GUM
by MB

Title: Vice President

Approval Date: 12/9/05

Expiration Date: N/A

E-mail Address: erh3@swbell.net

Conditions of Approval:

Attached ☐

Date: 11-11-05

Phone: 817-336-7109

* Attach Additional Sheets If Necessary