

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

30-015-22208

12-Dec-05

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 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 1 4 2005

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

<u>District I</u> 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

* Attach Additional Sheets If Necessary

State of New Mexico **Energy Minerals and Natural Resources**

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

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

Form C-141

Revised October 10, 2003

0-015-1	12200		Kele	ease Notific	cation	and Co	orrective A	ction		
						OPERA'	ГOR	☐ Initi	al Report XX Final Repor	
Name of Co	ompany Hi	idson ()i	I Comp	any of Tex	ras	Contact E. Randall Hudson III				
Address	6.	16 Texas	Stree	et		Telephone No. (817) 336-7109				
Facility Na	me Pi	ickett B	#25			Facility Type Pumping Well				
Surface Ow	mer Fed	deral		Mineral C	Owner	Federal Lease No. LC-029415-B				
				LOCA	ATION	OF RE	LEASE			
Unit Letter	Section	Township	Range	Feet from the	North/	rth/South Line Feet from the East/West Line County				
G	25	17	31	1345	N	orth_	1345	East	Eddy	
			La	titude		_ Longitud	le			
NATURE OF RELEASE										
Type of Release Oil and Produced Water						Volume of Release 4 DDLS Volume Recovered None				
Source of Release Flowline						Date and Hour of Occurrence Date and Hour of Discovery				
Was Immediate Notice Given? Yes No EXNot Required If YES, To Whom?										
By Whom?						Date and Hour				
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.				
		L	Yes 🗓	ĶΝο						
If a Watercou	urse was Imp	pacted, Descri	be Fully.				<u>-</u>		RECEIVED	
									•	
									NOV 1 4 2005	
Describe Cau	ise of Proble	m and Remed	lial Action	Taken.*		-			GOD-AATESIA	
3" poly	flowli	ne had s	small	crack or s	plit					
3" poly flowline had small crack or split Pipe was repaired										
Describe Are	a Affected a	nd Cleanup A	ction Tak	en.*						
Cand wi	th mati		-ation	- morted	cand	with ha	ckhoe the	n covered v	with clean sand.	
				and wellh					viui ciedi said.	
									uant to NMOCD rules and eases which may endanger	
									eases which may endanger eve the operator of liability	
									, surface water, human health	
or the enviror	nment. In ac	ldition, NMO	CD accep	tance of a C-141	report do	es not relieve	the operator of r	esponsibility for co	ompliance with any other	
federal, state,	or local law	s and/or regu	lations.				OIL CONS	TONI A TRONI	DIMEION	
\sim ($20\mu00$), \sim							OIL CONS		DIVISION	
Signature										
Printed Name: E. Randall Hudson III						Approved by	District Superviso	or: by MB	Lik Scanier	
Vice President										
	es orh	30swh_11	net	· · · · · · · · · · · · · · · · · · ·					7.17	
				817-336-7		onditions of	Approvat.		Attached	
or the enviror federal, state, Signature: Printed Name Title: E-mail Addre	E. Ra	ndall Hu Presider 3@swbell	CD acceptations. adson at	tance of a C-141	A A	Approved by	OIL CONS District Supervisors: 12/9/0.5	SERVATION TIM GUM or: by MB	DIVISION Le Lanuer Date: N/N	