

# 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

Hudson Oil Company of Texas 616 Texas Street Fort Worth, TX 76102-4696 30-015-28597

### 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: <a href="http://www.emnrd.state.nm.us/emnrd/ocd/EH-MiseGuidelines.htm">http://www.emnrd.state.nm.us/emnrd/ocd/EH-MiseGuidelines.htm</a>.

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

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 OUU-ARTESIA

Dear Mike:

RE:

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
1320 S. S. French Dr. Scate Fo. 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

1220 S. St. Flan	icis Dr., Sanu	a re, NM 6/30.	,	Sa	anta F	e, NM 875	505		side of form	
0-015-1	28597		Rel	ease Notific	catio	n and Co	orrective A	ction		
						OPERA'	TOR	☐ Initi	al Report 🔯 Final Repor	
Name of Company Hudson Oil Company of Texas						Contact E. Randall Hudson III				
Address 616 Texas Street						Telephone No. (817) 336-7109				
Facility Nat	me p	uckett F	3 #34			Facility Typ	e Pumping	Well		
Surface Ow	ner Fe	deral		Mineral (	)wner	Federal Lease No. Federal				
LOCATION OF RELEASE										
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/West Line	County	
В	25	17	31	20	North		2630	East	Eddy	
Latitude Longitude										
NATURE OF RELEASE										
Type of Release Oil & Produced Water						Volume of Release 3 bbls   Volume Recovered None				
Source of Release Wellhead						Date and Hour of Occurrence Date and Hour of Discovery				
Was Immediate Notice Given?  ☐ Yes ☐ No ★ Not Required If YES, To Whom?										
By Whom?							Date and Hour			
Was a Watercourse Reached?						If YES, Volume Impacting the Watercourse.				
Li Yes XX No										
If a Watercourse was Impacted, Describe Fully.*  NOV 1 4 2005										
ODD-MITERIA										
Describe Cau	se of Proble	em and Reme	dial Action	n Taken *						
Describe Cause of Problem and Remedial Action Taken.*										
Wellhead packing leaking - replace packing.										
						,		<del></del>		
Describe Area Affected and Cleanup Action Taken.*										
								and fill w	ith clean sand	
and gra	vel. (	Clean up	arroun	d pump uni	.t an	d locati	.on.			
I hereby certi	fy that the i	nformation gi	ven above	is true and comp	lete to t	he best of my	knowledge and ur	nderstand that nurs	uant to NMOCD 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 envir	onment. The	acceptance	e of a C-141 repo	rt by th	e NMOCD m	arked as "Final Re	port" does not reli	eve 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 lav	vs and/or regu	lations.		фон			esponsionity for ex	mpilatoe wat any outer	
	$\neg M$	$\mathcal{L}W\mathcal{U}$		`		OIL CONSERVATION DIVISION				
Signature:						TIM GUM				
Printed Name: E. Randall Hudson III						Approved by District Supervisor: by MB Mile Brances				
		Preside				Ammental D-4	a selala-	- Eu		
Title:		····			+	Approval Dat	c. 144/05	Expiration I	Date: MIF	
E-mail Address: erh3@swbell.net						Conditions of Approval:			Attached	

Phone: 817-336-7109

<sup>\*</sup> Attach Additional Sheets If Necessary