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Griswold, Jim, EMNRD

From:	Griswold, Jim, EMNRD
Sent:	Thursday, August 21, 2008 10:44 AM
То:	'joshua.morrissette@bjservices.com'
Subject:	Former Fracmaster Facility (1RP-2) in Hobbs

Hello Joshua,

Congratulations again on the birth of your newest child.

To reconfirm our phone conversation of Tuesday...Wayne Price has tasked me with reviewing the historic release of hydrocarbons to the subsurface from underground tank(s) at the BJ Services facility located at 1329 NW County Road in Hobbs. This release has an OCD Remediation Plan designation of 1RP-2. There are two reports, both prepared by Brown & Caldwell, which I have been able to review:

The first is the *July 2005 Soil and Groundwater Sampling Report* dated 2/14/06 describing the advancement of five soil borings, one of which was converted to a temporary groundwater monitoring well. According to the report, about 800 yards of contaminated soils were removed from the facility prior to the investigation with at least the excavation floor still indicating remaining contamination. I have no records in the files here in Santa Fe in that regard. BJ Services should provide any such information to the OCD Environmental Bureau. Nonetheless, groundwater was encountered during the investigation at a depth of 48 feet below ground surface. Elevated soil headspace was observed all the way to groundwater in 3 of the borings. Soil samples from each of the borings were split for lab analysis and assayed with concentrations of total petroleum hydrocarbons as high as 37,000 ppm (~4% hydrocarbon). The groundwater sample taken from the temporary well revealed a dissolved-phase impact in excess of NM standards for benzene, xylene, and naphthalene.

The second report is titled *February 2006 Soil and Groundwater Sampling Report* and is dated 6/1/06. This describes the installation of three monitoring wells in areas more removed from the release. Measureable concentrations of naphthalene, xylene, and trimethylbenzene (typically an indication of bacterial degradation of BTEX) were found in one of the wells, MW-2, that is situated marginally cross-gradient to the indicated direction of groundwater flow. Comparison of dissolved oxygen levels from the three wells potentially indicates the MW-2 sample was improperly aspirated during pumping which could have resulted in the volatilization and/or degradation of hydrocarbons from the sample. The volumes of water pumped prior to sampling also appear to have been insufficient to purge the wells of even a single bore volume of groundwater. Excessive levels of chloride were found in two of three water samples.

This site cannot be "closed" with the information at hand. Within the next 30 days, BJ Services should submit a workplan for my review and approval to advance additional soil borings and install permanent wells to more adequately define the remaining adsorbed- and dissolved-phase contamination. One monitoring well needs to be installed within the area of release between historic borings MS and ES, another roughly situated between existing wells MWs-2 and 3 in the downgradient direction, and a third to the south in an up-gradient direction. Appropriate soil assessment should occur during the advancement of borings and all wells, new and existing, need to be sampled. Soil and groundwater samples should be minimally assayed by Methods 8260, 8270, 8015 (GRO/DRO/MRO), and 300. The relative top-of-casing elevation of all wells should also be verified by survey. Please be specific within the workplan as to the intended techniques of sampling and well construction. The new wells should incorporate no more than 15 feet of well screen rather than the 20 feet previously used and still set to span the water table.

Jim Griswold Hydrologist Environmental Bureau ENMRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 direct: 505.476.3465 email: jim.griswold@state.nm.us



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

November 17, 2000

Lori Wrotenbery Director Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 5051 4737

Paul Kaster American Fracmaster P.O. 1900 Kilgore, Texas 75663

PUNCHASEA BY BJ JEN JOHN COMP-BJ PEN JOHN 0 GRID # 195 4 43

Re: Hobbs New Mexico Facilities

Dear Mr. Kaster:

The New Mexico Oil Conservation Division (OCD) inspected two Fracmaster facilities on June 17, 1999. The two facilities inspected were located at 1329 W. County Road and 3429 NW County Road on the West Side of Hobbs, NM. Recently the OCD conducted a drive-by and noticed the facilities were abandoned. Please provide to the OCD the status of these two properties.

If you have any questions please call me at 505-827-7155.

Sincerely;

Wayne Price-Pet. Engr. Spec.

Cc: OCD Hobbs Office

Attachments-

 SENDER: COMPLETE THIS SECTION Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: 	A. Received by (<i>Please Print Clearly</i>) B. Date of Delivery C. Signature X GEE Agent D. Is delivery address different from item 1? Yes If YES, enter delivery address below: No
P.O. 1900 KIL gora TEXAS 75663	3. Service Type 3. Certified Mail Express Mail Registered Insured Mail C.O.D. 4. Bestricted Delivery? (Extra Fee) Ven

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OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 6/17/99 Time: 2:30 PM OilField Service Co. Gas Plant 🗇 Compressor St. C Brine St. C Type of Facility: Refinery Surface Waste Mgt. Facility 🗇 E&P Site 🗇 Crude Oil Pump Station 🗇 Other No Yes D **Discharge Plan:** DP# FACILITY NAME: AMERICAN FRACMASTER PHYSICAL LOCATION: 3429 NW CONTY RD. HOBOS NM Legal: QRT QRT TS R County SAR OWNER/OPERATOR (NAME) PAUL KASTER 903-988-8800 Tele:# Contact Person: State TX ZIP 75663 P.O. 1900 KILGOFE MAILING ADDRESS: TΧ HECTOR DAUL KASTEX **Owner/Operator Rep's:** WARKE JFORD, D. WILLIAMS OCD INSPECTORS: 1. <u>Drum Storage</u>: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment. DRUMS LOCATED IN SW PARE of YARD HNS PAS & CURB NO 2. <u>Process Areas</u>: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design. SHOP + YARD - OK 3. <u>Above Ground Tanks</u>: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

- NONE OBSERVED

OCD Inspection Sheet Page μ of μ

4. <u>Above Ground Saddle Tanks</u>: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure. SAG 60 AVED USED OIL Valle TANK 5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information. OK 6. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. BAY SUMP HAS NO SECONDARY CONTAINMENT + NO TEST REP IN LAST YEAR - NO RECORDS RFORED 7. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. SHOP AREA - NO TEST PERFORMED IN LAST YEAR. FLOOR DRAINS IN 8. <u>Onsite/Offsite Waste Disposal and Starge Practices:</u> Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? _____ Yes _____ No ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES 🗇 👘 NO OF IF NO DETAIL BELOW. WASTE WATER ETALUENT HAS NOT BEEN TESTED - 90ES TO CLASS I WELL.

OCD Inspection Sheet Page ____ of ____



9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foresceable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment.

ANY CLASS V WELLS NO C YES OF IF YES DESCRIBE BELOW!

WASH BAY + FLOOD ORAWS TO 55TAJE OR WALER SOLIA SEPONAton TO GROUND.

10. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD - MINON LEAKS & ORIAS FROM TROCKS

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

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12. Does the facility have any other potential environmental concerns/issues?

YE5 -CLASS T VEU

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

14. ANY WATER WELLS ON SITE ? NO I YES & IF YES, HOW IS IT BEING USED ?

WATER WELL IS NOT DEANY USED AT THIS TIME.

Miscellaneous Comments:

Wace DISCHARGE PLAN WILL NOTHIED MR. KASTER THAT CLASS I WELL ACTIVE BE REQUINED DUE 70

Number of Photos taken at this site: 5 0: ENUR ... Pic_CAM Picooo2

attachments pHoto's MSE 4

OCD Inspection Sheet Page ____ of ____



PHOLOS AY W. PRICE - OCD 6/17/99 AMERICAN FRACMASTER

OCD ENVIRONMENTAL BUREAU SITE INSPECTION SHEET

DATE: 6/17 79 Time: # 3:15 PM OilField Service Co. Type of Facility: Refinery Gas Plant O Compressor St. 🛛 Brine St. 🗇 Surface Waste Mgt. Facility 🗇 E&P Site 🗇 Crude Oil Pump Station 🗇 Other O Discharge Plan: No to Yes C DP# AMERICAN FRAC MASTER - (OLD KNOX SERVICES YARD) ON: 1329 W COUNTY ROAD - HOBOS NM FACILITY NAME: PHYSICAL LOCATION: 1329 LËR County R Legal: QRT_ QRT Sec TS OWNER/OPERATOR (NAME) AMERICAN FRACMASTER Tele:# 903-988-8800 397-1227 PAUL KASTER Contact Person: po. 1900 KILGONS MAILING ADDRESS: PAUL KASTER Owner/Operator Rep's:____ OCD INSPECTORS: W PRIEF, J FORD, D. WILLIAMS 1. <u>Drum Storage</u>: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment. Is It Hout CHEMICAL DRUMS STORED PAd + CURD. 2. <u>Process Areas</u>: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design. OADING + UNLOADING AREAS SHOW SIGNS OF CONTAMINATION. 3. <u>Above Ground Tanks</u>: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure. BRINE TANK HAS NO CONTAINMENT.

OCD Inspection Sheet Page _____ of _____

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4. <u>Above Ground Saddle Tanks</u>: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

TANK HAS CONTHINMENT. EXCEPT HAS OPEN NALVE TO CIN 5. Laheling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information. SEVENAL TANKS & ARUMS NEEN MBELS. 6. <u>Below Grade Tanks/Sumps</u>: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. DOCK WASTE going To BGT YES-ACIA MAS LOST INTEGRAL 7. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. PRESSURE CHECK. NEED 8. <u>Onsite/Offsite Waste Disposal and Storage Practices:</u> Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? <u>Yes</u> No Yes ___ ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES () NO Ø IF NO DETAIL BELOW.

WASTE LIQUID BEING DISCHARGED INTO PIT AREA OF BGT SYSTEM. PIT HAS NO LINER. WASTE LIQUID MO HAS NOT BEEN TESTED. INTO, FRAC SAND DISCHARGED pit SAME

OCD Inspection Sheet

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO I YES & IF YES DESCRIBE BELOW!

BGT NEAT ACM pit At DOCK MULINGO

10. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overlopping or system failure. A record of inspections will be retained on site for a period of five years.

NEEDS IMPROVEMENT -

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11. <u>Spill Reporting</u>: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

OBSENTED BRINE + ACRO SAILLS

12. Does the facility have any other potential environmental concerns/issues?

AREA WEST 1<1/ OCH TRUCK 04

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

14. ANY WATER WELLS ON SITE ? NO () YES () IF YES, HOW IS IT BEING USED ?

MAKE-UP WATER

Miscellaneous Comments:

THIS FACILIEY CAN BE PERMITERS OCD DILL Notky

Number of Photos taken at this site: 5- 0: EPNR ... Pic_CAM Pic 00002

attachments-

OCD Inspection Sheet Page _____ of _____