

NM1 - 6

**INSPECTION,
RESPONSE,
AND
ACTIONS
2012**

Jones, Brad A., EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Friday, February 24, 2012 9:15 AM
To: Jones, Brad A., EMNRD
Subject: FW: UPDATE: CRI NMDOT Complaint

From: Moore, Audrey J., NMDOT
Sent: Friday, February 24, 2012 9:14 AM
To: VonGonten, Glenn, EMNRD
Subject: RE: UPDATE: CRI NMDOT Complaint

Thank you Glenn. I appreciate the update.

I hope you have a great weekend!

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

From: VonGonten, Glenn, EMNRD
Sent: Friday, February 24, 2012 8:37 AM
To: Moore, Audrey J., NMDOT
Subject: FW: UPDATE: CRI NMDOT Complaint

Audrey,

Here is an update from CRI about how it will address the mud on the highway issue.

Glenn

From: Jones, Brad A., EMNRD
Sent: Thursday, February 23, 2012 8:08 AM
To: Zach Davis; VonGonten, Glenn, EMNRD
Cc: Wayne Crawley; Clayton A. McDonald; Charles White
Subject: FW: UPDATE: CRI NMDOT Complaint

Zach,

Thank you for keeping OCD updated on the matter... please continue to keep us apprised of the situation. OCD appreciates R360's effort in addressing this issue.

Brad

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Zach Davis [<mailto:zdavis@r360es.com>]
Sent: Thursday, February 23, 2012 6:33 AM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald; Charles White
Subject: UPDATE: CRI NMDOT Complaint

Brad,

I wanted to provide a status update on work performed towards the resolution NM-DOT complaint of mud on Highway 62/180 in front of the Halfway facility and the dedicated turn lanes. The resolution is moving along quickly and our senior management still considers this an utmost priority. Our VP of Operations for Project Management, Chuck White, met with our design and construction contractor HDR on Tuesday February 14th about construction plans for both of our issues at the Halfway facility. R360 is still in contact with officials from NM-DOT Gary Shubert, District Engineer; Ralph Meeks, Maintenance Engineer; Robert Kurtz, Engineer Support Manager; and Dan Gershin, General Counsel. Here are the current plans as they stand now:

Mud on The Highway

We plan to pave some of the internal roads of Halfway that lead back from the entrance of the facility. The section of road from the 8-bay wash rack to the CRI entrance/exit will be paved with concrete as well as the road heading east to the landfill will be paved to just past the stock pond on property (items marked in red on attached map). We are also exploring adding in some bump mats to help agitate the mud off the trucks before they get on the newly concreted roads.

Turn Lanes

HDR has been talking to NM-DOT about how and where to install the west bound and east bound turn lanes.

We expect to have a Scope of Work from HDR on the project that will outline the time line and provide construction drawings as to where and how everything will be installed early next week. R360 plans to survey the problem areas and perform necessary site grading in the next one to two weeks and finish design for paving interior roads and placement of mud tracking control measures shortly after that. Construction start will be expedited and fast tracked as designs are being completed.

We are working hard to resolve this issue with NM-DOT and we appreciate your patience.


Thank you,

Zach Davis

Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060
O: 281.873.3243 | C: 972.768.3359
Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, February 23, 2012 8:08 AM
To: 'Zach Davis'; VonGonten, Glenn, EMNRD
Cc: Wayne Crawley; Clayton A. McDonald; Charles White
Subject: FW: UPDATE: CRI NMDOT Complaint
Attachments: Map.pdf

Zach,

Thank you for keeping OCD updated on the matter... please continue to keep us apprised of the situation. OCD appreciates R360's effort in addressing this issue.

Brad

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Zach Davis [<mailto:zdavis@r360es.com>]
Sent: Thursday, February 23, 2012 6:33 AM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald; Charles White
Subject: UPDATE: CRI NMDOT Complaint

Brad,

I wanted to provide a status update on work performed towards the resolution NM-DOT complaint of mud on Highway 62/180 in front of the Halfway facility and the dedicated turn lanes. The resolution is moving along quickly and our senior management still considers this an utmost priority. Our VP of Operations for Project Management, Chuck White, met with our design and construction contractor HDR on Tuesday February 14th about construction plans for both of our issues at the Halfway facility. R360 is still in contact with officials from NM-DOT Gary Shubert, District Engineer; Ralph Meeks, Maintenance Engineer; Robert Kurtz, Engineer Support Manager; and Dan Gershin, General Counsel. Here are the current plans as they stand now:

Mud on The Highway

We plan to pave some of the internal roads of Halfway that lead back from the entrance of the facility. The section of road from the 8-bay wash rack to the CRI entrance/exit will be paved with concrete as well as the road heading east to the landfill will be paved to just past the stock pond on property (items marked in red on attached map). We are also exploring adding in some bump mats to help agitate the mud off the trucks before they get on the newly concreted roads.

Turn Lanes

HDR has been talking to NM-DOT about how and where to install the west bound and east bound turn lanes.

We expect to have a Scope of Work from HDR on the project that will outline the time line and provide construction drawings as to where and how everything will be installed early next week. R360 plans to survey the problem areas and perform necessary site grading in the next one to two weeks and finish design for paving interior roads and placement of mud tracking control measures shortly after that. Construction start will be expedited and fast tracked as designs are being completed.

We are working hard to resolve this issue with NM-DOT and we appreciate your patience.

Thank you,

Zach Davis


Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3243 | C: 972.768.3359

Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: Zach Davis <zdavis@r360es.com>
Sent: Thursday, February 23, 2012 6:33 AM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald; Charles White
Subject: UPDATE: CRI NMDOT Complaint
Attachments: Map.pdf

Brad,

I wanted to provide a status update on work performed towards the resolution NM-DOT complaint of mud on Highway 62/180 in front of the Halfway facility and the dedicated turn lanes. The resolution is moving along quickly and our senior management still considers this an utmost priority. Our VP of Operations for Project Management, Chuck White, met with our design and construction contractor HDR on Tuesday February 14th about construction plans for both of our issues at the Halfway facility. R360 is still in contact with officials from NM-DOT Gary Shubert, District Engineer; Ralph Meeks, Maintenance Engineer; Robert Kurtz, Engineer Support Manager; and Dan Gershin, General Counsel. Here are the current plans as they stand now:

Mud on The Highway

We plan to pave some of the internal roads of Halfway that lead back from the entrance of the facility. The section of road from the 8-bay wash rack to the CRI entrance/exit will be paved with concrete as well as the road heading east to the landfill will be paved to just past the stock pond on property (items marked in red on attached map). We are also exploring adding in some bump mats to help agitate the mud off the trucks before they get on the newly concreted roads.

Turn Lanes

HDR has been talking to NM-DOT about how and where to install the west bound and east bound turn lanes.

We expect to have a Scope of Work from HDR on the project that will outline the time line and provide construction drawings as to where and how everything will be installed early next week. R360 plans to survey the problem areas and perform necessary site grading in the next one to two weeks and finish design for paving interior roads and placement of mud tracking control measures shortly after that. Construction start will be expedited and fast tracked as designs are being completed.

We are working hard to resolve this issue with NM-DOT and we appreciate your patience.

Thank you,

Zach Davis


Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3243 | C: 972.768.3359

Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 09, 2012 2:05 PM
To: Sanchez, Daniel J., EMNRD; Jones, Brad A., EMNRD; Bailey, Jami, EMNRD
Subject: FW: CRI NMDOT Complaint

FYI,

Glenn

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 09, 2012 1:23 PM
To: VonGonten, Glenn, EMNRD
Subject: RE: CRI NMDOT Complaint

Thank you Glenn,

Whether R360s response is considered satisfactory will be up to the NMDOT's District 2 office in Roswell since they have first hand knowledge of the problems posed by the spilled mud and resulting slick driving conditions. Based on their response, there are other concerns as well. I'll ask Ralph Meeks to let you know when the District is satisfied with the results.

I appreciate your discussing this up with R360.

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 09, 2012 1:14 PM
To: Moore, Audrey J., NMDOT; Villegas, Alvino R., NMDOT; Meeks, Ralph L., NMDOT
Cc: Sanchez, Daniel J., EMNRD; Jones, Brad A., EMNRD; Bailey, Jami, EMNRD
Subject: FW: CRI NMDOT Complaint

Audrey,

OCD did meet with CRI this week and brought up the mud issue with them. Here is their response.

Please let OCD know when you feel that the matter has been satisfactorily addressed.

Glenn

From: Jones, Brad A., EMNRD
Sent: Thursday, February 09, 2012 8:37 AM
To: VonGonten, Glenn, EMNRD
Subject: FW: CRI NMDOT Complaint

From: Zach Davis [<mailto:zdavis@r360es.com>]
Sent: Wednesday, February 08, 2012 10:02 PM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald
Subject: CRI NMDOT Complaint

Brad,

Per our discussion yesterday attached is a recent email chain concerning what R360 is developing with NMDOT on the resolution of the mud on the Carlsbad Highway in front of the facility.

Our VP of Operations for the Permian Basin and our Facility Manager has met with a Robert Kurtz and other members of the Carlsbad NMDOT Office on the week of January 9th. R360 wanted to have permission to conduct periodic maintenance and road cleaning on the highway to resolve the mud issue however the NMDOT did not grant this permission. NMDOT asked us to put in two turn lanes for the approach into and out of our facility. This was to aid in easing of traffic along the highway and provide safer entry and exit for trucks coming to and from the facility. We have contacted our engineering firm HDR to assist with this project. HDR has assigned a project manager to get the design plans detailed, along with the cost and construction timeline.

A Ralph Maeks, Maintenance Engineer, NMDOT met with us on the entrance and exit to the facility as well his concern was the mud on the highway. We are working on plans with HDR to address this issue. We believe that by adding in a longer cement drive and grading our facility roads to aid in drainage should eliminate the issue. Our PM with HDR is reviewing the options and we hope to have the project and construction started by the end of February.

Our corporate office in Houston is completely involved in this issue and has made this project a priority. I will update you throughout the month as we make progress. If you have any other questions or concerns please feel free to contact me.

Thank you,

Zach Davis


Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3243 | C: 972.768.3359

Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 09, 2012 1:14 PM
To: Moore, Audrey J., NMDOT; Villescas, Alvino R., NMDOT; Meeks, Ralph L., NMDOT
Cc: Sanchez, Daniel J., EMNRD; Jones, Brad A., EMNRD; Bailey, Jami, EMNRD
Subject: FW: CRI NMDOT Complaint
Attachments: Fw: New Mexico Turn Lane

Audrey,

OCD did meet with CRI this week and brought up the mud issue with them. Here is their response.

Please let OCD know when you feel that the matter has been satisfactorily addressed.

Glenn

From: Jones, Brad A., EMNRD
Sent: Thursday, February 09, 2012 8:37 AM
To: VonGonten, Glenn, EMNRD
Subject: FW: CRI NMDOT Complaint

From: Zach Davis [<mailto:zdavis@r360es.com>]
Sent: Wednesday, February 08, 2012 10:02 PM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald
Subject: CRI NMDOT Complaint

Brad,

Per our discussion yesterday attached is a recent email chain concerning what R360 is developing with NMDOT on the resolution of the mud on the Carlsbad Highway in front of the facility.

Our VP of Operations for the Permian Basin and our Facility Manager has met with a Robert Kurtz and other members of the Carlsbad NMDOT Office on the week of January 9th. R360 wanted to have permission to conduct periodic maintenance and road cleaning on the highway to resolve the mud issue however the NMDOT did not grant this permission. NMDOT asked us to put in two turn lanes for the approach into and out of our facility. This was to aid in easing of traffic along the highway and provide safer entry and exit for trucks coming to and from the facility. We have contacted our engineering firm HDR to assist with this project. HDR has assigned a project manager to get the design plans detailed, along with the cost and construction timeline.

A Ralph Maeks, Maintenance Engineer, NMDOT met with us on the entrance and exit to the facility as well his concern was the mud on the highway. We are working on plans with HDR to address this issue. We believe that by adding in a longer cement drive and grading our facility roads to aid in drainage should eliminate the issue. Our PM with HDR is reviewing the options and we hope to have the project and construction started by the end of February.

Our corporate office in Houston is completely involved in this issue and has made this project a priority. I will update you throughout the month as we make progress. If you have any other questions or concerns please feel free to contact me.

Thank you,

Zach Davis


Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3243 | C: 972.768.3359

Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: Jesse Dominguez <jdominguez@r360es.com>
Sent: Wednesday, February 08, 2012 9:39 AM
To: Zach Davis
Subject: Fw: New Mexico Turn Lane

Follow Up Flag: Follow up
Flag Status: Flagged

Sent via BlackBerry by AT&T

From: "Clayton A. McDonald" <cmcdonald@r360es.com>
Date: Tue, 7 Feb 2012 11:46:09 -0600
To: Jesse Dominguez<jdominguez@r360es.com>; John Barnidge<jbarnidge@r360es.com>
Cc: Richard Johnson<rjohnson@r360es.com>; Charles White<cwhite@r360es.com>
Subject: FW: New Mexico Turn Lane

To All

Chuck and I just spoke and hopefully he will be able to make a run to Hobbs next week to get boots on the ground and help with our construction projects.

Jesse, John - See email trail below to get up to speed on the NMDOT issue.

Jesse - If Ralph Maekes, NMDOT stops by let him know what we are doing ... show him a copy of this email ... I would include him but I do not have his email address.

Clayton A. McDonald
Vice President of Operations
Permian Basin Region
R360 Environmental Solutions
P.O. Box 81016, Midland TX 79708
O: 432.218.9552 | F: 432.218.9920 | C: 432.631.2205
Email: cmcdonald@r360es.com



From: Clayton A. McDonald
Sent: Tuesday, February 07, 2012 11:07 AM
To: Charles White
Subject: FW: New Mexico Turn Lane

Chuck

See email trail below. I'm in the office so call me when you have a minute. I'll be leaving in a couple hours to go to the field.

ClayMc

Clayton A. McDonald
Vice President of Operations

Permian Basin Region

R360 Environmental Solutions

P.O. Box 81016, Midland TX 79708

O: 432.218.9552 | F: 432.218.9920 | C: 432.631.2205

Email: cmcdonald@r360es.com



From: Clayton A. McDonald
Sent: Tuesday, February 07, 2012 11:02 AM
To: Kurtz, Robert C., NMDOT (Robert.Kurtz@state.nm.us)
Cc: John Barnidge; Richard Altman
Subject: FW: New Mexico Turn Lane

Good Morning Sir

Please see email trail below. Rich Altman, VP of Engineering, is working with HDR to get the design plans detailed, along with the cost and construction time. Our corporate office has made this project a priority so we hope to get with you by the end of February for an update.

As for the entrance/exit inside the Halfway facility, we have collected proposals and will be reviewing with our construction Project Manager to ensure it meets specifications. We have been working with Ralph Maeks, Maintenance Engineer, NMDOT, regarding the mud being carried onto the roadway by trucks leaving our facility and feel that by grading some areas inside the facility to help with drainage, plus the addition of a cement driveway, we can eliminate that issue. Once our construction PM has reviewed the plans, we hope to have the project awarded and begin construction by the end of February.

Please let me know if you have any questions.

Clayton A. McDonald
Vice President of Operations
Permian Basin Region
R360 Environmental Solutions
P.O. Box 81016, Midland TX 79708
O: 432.218.9552 | F: 432.218.9920 | C: 432.631.2205
Email: cmcdonald@r360es.com



From: Awezec, John [<mailto:John.Awezec@hdrinc.com>]
Sent: Monday, February 06, 2012 9:42 PM
To: Richard Altman
Cc: Charles White; Clayton A. McDonald; Daw, Brian; Glover, Jeff; Snead, Anthony
Subject: RE: New Mexico Turn Lane

Hello Rich,

We will be assigning Brian Daw to be Halfway's Design Project Engineer. He can work with Charles (Chuck) to develop the roadway design and pavement section for the turn lanes.

We will need to establish a new engineering task order for this work, as I understand from Jeff Glover we have exhausted the engineering funds that were contracted under the HDRC DB contract for the treatment facility design.

It is my recommendation that this next task order for design of the turn lanes be initiated under the engineering master agreement. Let me know if this meets you concur with this approach and we will initiate the task order scope and pricing.

Thanks,

John

JOHN S. AWEZEC
PE, LEED AP

HDR Engineering
Vice President
Central Region Alternative Delivery Director

303 East 17th Avenue | Denver, CO 80203-1256
303.764.1525 | c: 303.525.2107
john.awezec@hdrinc.com

Follow Us – Architizer | Facebook | Twitter | YouTube | Flickr

From: Richard Altman [<mailto:raltman@r360es.com>]
Sent: Monday, February 06, 2012 3:10 PM
To: Awezec, John
Cc: Charles White; Clayton A. McDonald
Subject: New Mexico Turn Lane
Importance: High

John,

My new employee started this morning (Chuck White mobile #713-819-0890).

At our facility in New Mexico (Halfway) we need to build two turn lanes off the interstate on each directional approach (North and South bound).

We are just initiating contact with NMDOT and I'd like a contact name and number from HDR, whom would be able to assist (Chuck) with the design of these two turn lanes, costing and construction. Need to work this project separately from our current facility project at Halfway, but as usual it is a priority.

This is approved to move forward internally at R360.

Thanks and

Best regards

Rich

Richard A. Altman
Senior Vice President

Engineering & Development
R360 Environmental Solutions Inc.

Vice President of Operations

Rocky Mountain Region

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3211 | F: 281.873.3261 | C: 281-787-6543

raltman@r360es.com



Jones, Brad A., EMNRD

From: Zach Davis <zdavis@r360es.com>
Sent: Wednesday, February 08, 2012 10:02 PM
To: Jones, Brad A., EMNRD
Cc: Wayne Crawley; Clayton A. McDonald
Subject: CRI NMDOT Complaint
Attachments: Fw: New Mexico Turn Lane

Brad,

Per our discussion yesterday attached is a recent email chain concerning what R360 is developing with NMDOT on the resolution of the mud on the Carlsbad Highway in front of the facility.

Our VP of Operations for the Permian Basin and our Facility Manager has met with a Robert Kurtz and other members of the Carlsbad NMDOT Office on the week of January 9th. R360 wanted to have permission to conduct periodic maintenance and road cleaning on the highway to resolve the mud issue however the NMDOT did not grant this permission. NMDOT asked us to put in two turn lanes for the approach into and out of our facility. This was to aid in easing of traffic along the highway and provide safer entry and exit for trucks coming to and from the facility. We have contacted our engineering firm HDR to assist with this project. HDR has assigned a project manager to get the design plans detailed, along with the cost and construction timeline.

A Ralph Maeks, Maintenance Engineer, NMDOT met with us on the entrance and exit to the facility as well his concern was the mud on the highway. We are working on plans with HDR to address this issue. We believe that by adding in a longer cement drive and grading our facility roads to aid in drainage should eliminate the issue. Our PM with HDR is reviewing the options and we hope to have the project and construction started by the end of February.

Our corporate office in Houston is completely involved in this issue and has made this project a priority. I will update you throughout the month as we make progress. If you have any other questions or concerns please feel free to contact me.

Thank you,

Zach Davis


Environmental Scientist

Greenspoint Plaza 4, 16945 Northchase Drive, Suite 2200, Houston, TX 77060

O: 281.873.3243 | C: 972.768.3359

Email: zdavis@r360es.com



 Please consider the environment before printing this email

Jones, Brad A., EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, February 07, 2012 4:42 PM
To: Jones, Brad A., EMNRD
Subject: FW: drill mud site
Attachments: US 62_180 01.10.2012 (15).JPG; 01.23.2012 (7).JPG; US 62_180 01.10.2012 (3).JPG; US 62_180 01.10.2012 (7).JPG

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3490
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us

Website: <http://www.emnrd.state.nm.us/ocd/>

"Why not Prevent Pollution; Minimize Waste; Reduce the Cost of Operations; & Move Forward with the Rest of the Nation?" To see how, go to "Pollution Prevention & Waste Minimization" at:
<http://www.emnrd.state.nm.us/ocd/environmental.htm#environmental>

From: Horowitz, Ruth, NMENV
Sent: Thursday, February 02, 2012 10:38 AM
To: Chavez, Carl J, EMNRD
Subject: FW: drill mud site

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:23 AM
To: Horowitz, Ruth, NMENV
Subject: RE: drill mud site

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:12 AM
To: Horowitz, Ruth, NMENV
Subject: drill mud site

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

Jones, Brad A., EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 02, 2012 2:40 PM
To: Chavez, Carl J, EMNRD; Jones, Brad A., EMNRD; Sanchez, Daniel J., EMNRD
Subject: FW: R-360

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 2:39 PM
To: VonGonten, Glenn, EMNRD
Subject: RE: R-360

Thank you Glenn.

Would you mind letting Richard Villescas (NMDOT's Area Maint. Supervisor, 575-637-7251) and Ralph Meeks (District Maintenance Engineer, 575-637-7231) know what results from the meeting?

I appreciate your help! If there's anything more I can provide, just call.

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 02, 2012 1:54 PM
To: Horowitz, Ruth, NMENV; Moore, Audrey J., NMDOT
Cc: Chavez, Carl J, EMNRD; Jones, Brad A., EMNRD; Sanchez, Daniel J., EMNRD; Bailey, Jami, EMNRD
Subject: R-360

OCD has a meeting scheduled with R-360 next Tuesday at 1:00 PM and we will discuss this complaint with them.

Glenn von Gonten
Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3488
Fax-476-3462
glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

Jones, Brad A., EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Thursday, February 02, 2012 1:54 PM
To: Horowitz, Ruth, NMENV; Moore, Audrey J., NMDOT
Cc: Chavez, Carl J, EMNRD; Jones, Brad A., EMNRD; Sanchez, Daniel J., EMNRD; Bailey, Jami, EMNRD
Subject: R-360

OCD has a meeting scheduled with R-360 next Tuesday at 1:00 PM and we will discuss this complaint with them.

Glenn von Gonten

Senior Hydrologist
Environmental Bureau
Oil Conservation Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
505-476-3488
Fax-476-3462
glenn.vongonten@state.nm.us
<http://www.emnrd.state.nm.us/ocd/>

Chavez, Carl J, EMNRD

From: Horowitz, Ruth, NMENV
Sent: Thursday, February 02, 2012 10:39 AM
To: Chavez, Carl J, EMNRD
Subject: FW: R360 Environmental Solutions

Environmental Notification Tracking System

View Notification

[Back to list](#)

Notification Id 8957
Notification Type Spills
Notification Date 2/2/2012 9:14:16 AM
Notification Priority
EJ Issue
Status Assign Staff
Assigned Bureau Hazardous Waste Bureau
Assigned Staff Horowitz, Ruth
Status Date 2/2/2012 9:22:02 AM
Description Trucks between Hobbs and Carlsbad are spilling their drilling mud. Could be a contaminant risk.
Location R360 Environmental Solutions. MM 66 on US 62/180
Nearest City Hobbs
County Lea
District III
Field Office Hobbs
Suspected Violator Multiple
Violator Address1
Violator Address2
Violator City
Violator State
Violator Zip
Violator Phone
Reporter Name Audrey Moore - DOT
Reporter Address1
Reporter Address2
Reporter City
Reporter State
Reporter Zip
Reporter Phone 505-827-1715
Reporter Email
Created By ruth.horowitz
Date Created 2/2/2012 8:35:09 AM

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:37 AM
To: Horowitz, Ruth, NMENV
Subject: R360 Environmental Solutions

Ruth,

I just scanned through the plethora of e-mails I received yesterday & found the name of the business: R360 Environmental Solutions. Again, the location is MP 66 (S side) US 62/180 between Hobbs & Carlsbad, Lea County.

These are the folks that called me and have provided the information I have:

Ralph Meeks, P.E. (NMDOT's D-2 Maintenance Engineer) 575-637-7231
Richard Villescas (NMDOT's Area Maintenance Supervisor) 575-637-7251
Joe Fresquez (NMDOT's D-2 Risk Management) 575-637-7261

Hope this helps! Please call if I can provide any other information & please keep me apprised of any developments.

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:16 AM
To: Horowitz, Ruth, NMENV
Subject: RE: drill mud site

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:12 AM
To: Horowitz, Ruth, NMENV
Subject: drill mud site

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us

Chavez, Carl J, EMNRD

From: Horowitz, Ruth, NMENV
Sent: Thursday, February 02, 2012 10:38 AM
To: Chavez, Carl J, EMNRD
Subject: FW: drill mud site
Attachments: US 62_180 01.10.2012 (15).JPG; 01.23.2012 (7).JPG; US 62_180 01.10.2012 (3).JPG; US 62_180 01.10.2012 (7).JPG

From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:23 AM
To: Horowitz, Ruth, NMENV
Subject: RE: drill mud site

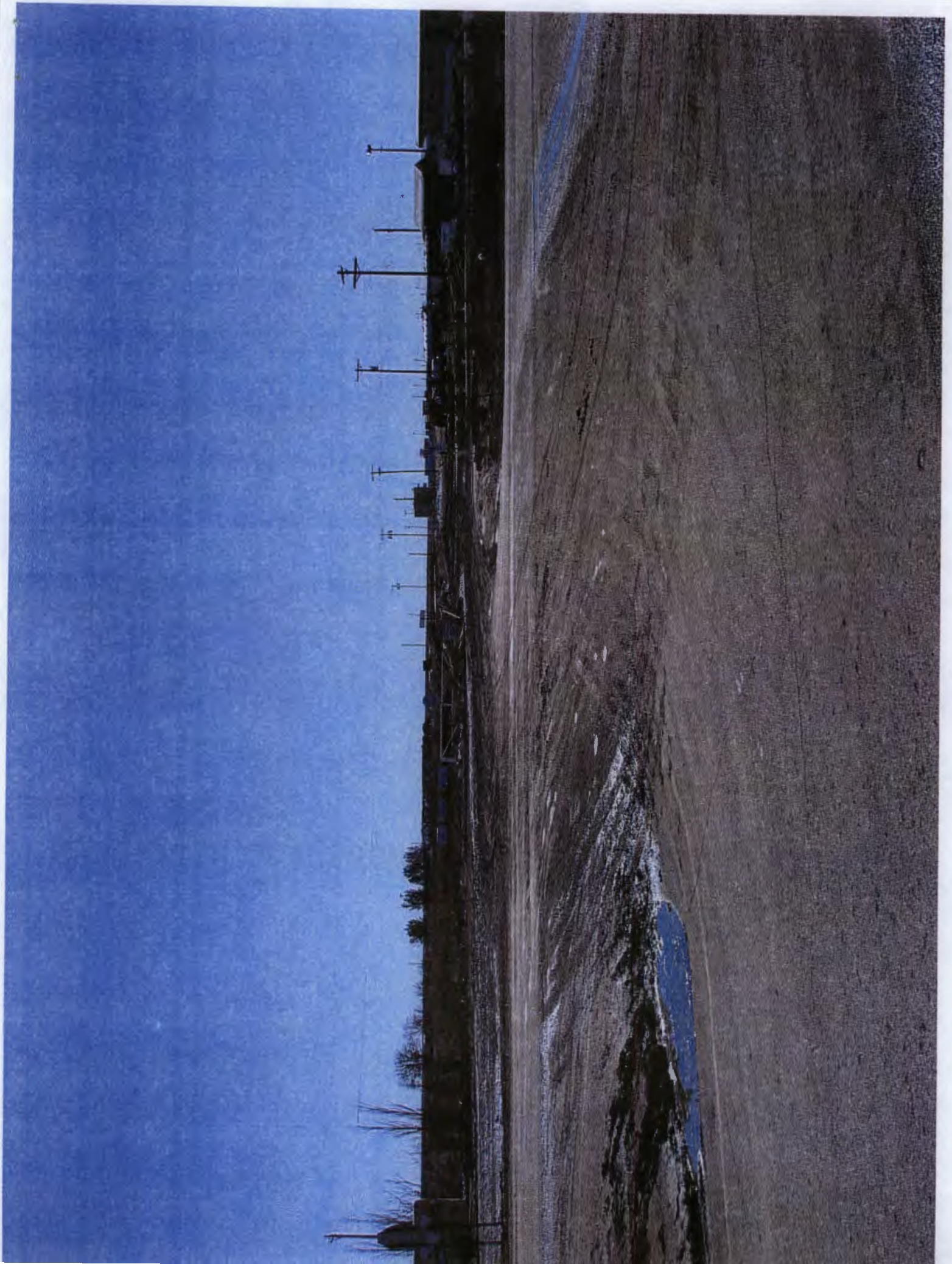
From: Moore, Audrey J., NMDOT
Sent: Thursday, February 02, 2012 9:12 AM
To: Horowitz, Ruth, NMENV
Subject: drill mud site

Audrey J. Moore
NMDOT Environmental Geology Bureau
PO Box 1149, Room 126
Santa Fe, NM 87504-1149
(ofc) 505-827-1715
(fax) 505-827-3243
Audrey.Moore@state.nm.us











Greenspoint Plaza 4
16945 Northchase Drive, Suite 2200
Houston, Texas 77060
281.872.R360 (7360) Office
www.r360environmentalsolutions.com

April 30, 2012

Brad Jones
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 S. St Francis Drive
Santa Fe, NM 87505

**Re: Controlled Recovery, Inc.
Permit # NM-01-006 / R-9166
3/23/12 Field Inspection Summary**

On March 29th 2012 R360/Controlled Recovery Inc. received an email with the results of an Oil Conservation Division (Division) field inspection made on March 23rd, 2012. (The email was received after 6:30pm on the 29th, so R360 uses 3/30/2012 as the official day with regard to responses.)

The inspection resulted in two conclusions; 1) a breach releasing liquids from the evaporation ponds and 2) overspray from the evaporators has impacted neighboring vegetation.

R360 has developed the following procedures to address the breach and to ensure that no additional breach occurs:

- Any gaps that are present in the berms around the evaporation ponds and the berm around the facility will be repaired (This task has been completed)
 - This meets Condition D2 of the 2004 Settlement Agreement between R360/CRI and the Division
- A minimum freeboard of three (3) feet in non-settlement agreement ponds, 3aa, 3bb, 6a and 6b, will be maintained. For all ponds covered under the settlement agreement a minimum of 1 foot freeboard will be maintained.
 - This meets Condition D11 of the 2004 Settlement Agreement between R360/CRI and the Division
- Evaporation ponds will be visually inspected on a daily basis and after a major rainfall or windstorm, and maintenance of berms in such a manner as to prevent erosion, any defects will be noted and repairs made as soon as possible.
 - This meets Condition D13 of the 2004 Settlement Agreement between R360/CRI and the Division

2012 MAR - 10 10:14 AM
RECEIVED

- A minimum freeboard marker will be installed in each pond to assist site personnel to visually check water levels. On each marker the minimum freeboard for the pond will be delineated in a way that is clearly visible from the outside edge of the pond berm.

R360/CRI has used atomizing evaporators at this facility to increase evaporative loss and added additional evaporators in the fourth quarter of 2011. This recent increase in use of evaporators contributed to the overspray at the facility. R360/CRI has discontinued use of atomizing evaporators at the facility.

R360 is currently working on a plan to remediate the impacted area. This plan should be submitted within the 30 day time frame requested by the OCD.

Should you have any questions or comments, please contact Zach Davis (9281.873.3243) or me at (281.873.3205).

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Crawley", written in a cursive style.

Wayne Crawley

Senior VP, Regulatory Affairs

cc: Clay McDonald, R360/CRI

11-0115-08

2012 MAY 23 PM 3:45

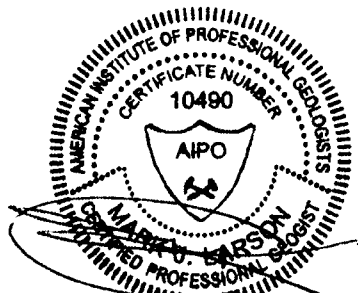
**SPILL AND OVERSPRAY
REMEDIATION PLAN**
Controlled Recovery, Inc., Halfway Facility
Lea County, New Mexico

Project No. 11-0115-08

May 16, 2012

Prepared for:
Mr. Wayne Crawley, Sr. Vice President
Regulatory Affairs
Greenspoint Plaza 4
16945 Northchase Drive, Suite 2200
Houston, TX 77060

Prepared by:
Larson & Associates, Inc.
507 North Marienfeld, Suite 200
Midland, Texas 79701



Mark J. Larson, PG, CPG
Certified Professional Geologist No. 10490

SPILL AND OVERSPRAY REMEDIATION PLAN
Controlled Recovery, Inc., Lea County, New Mexico
May 17, 2012

1.0 INTRODUCTION

On behalf of R360 Permian Basin (R360), owner of Controlled Recovery, Inc. (CRI), Larson & Associates, Inc (LAI) submits this plan to the New Mexico Oil Conservation Division (OCD) Environmental Bureau. This plan addresses remedial actions for affected soil from a spill and overspray that occurred at the Halfway facility (Site) and offsite immediately adjacent to the Site. The Site operates under OCD permit NM-01-006/R-9166. The spill occurred west of the Site, while the overspray occurred adjacent to the spill area on southwest of the Site. The overspray and spill occurred on land administered by the U. S. Bureau of Land Management (BLM).

The Site is located in Unit F (SE/4, NW/4), Section 27, Township 20 South and Range 32 East in Lea County, New Mexico. The spill covers approximately 5,400 square feet or approximately 0.12 acres. Figure 1 presents a location and topographic map. Figure 2 presents an aerial map. Figure 3 presents a Site drawing and spill area.

2.0 BACKGROUND

On March 23, 2012, representatives of the OCD and BLM conducted an inspection and observed the overspray and spill on BLM land. On March 29, 2012, OCD required R360, within 30 days, to submit a plan to remediate the spill and overspray. Appendix A presents the inspection report and OCD communications. Appendix B presents two photographs of the affected area.

3.0 REMEDIATION PLAN

R360 proposes to scrape affected vegetation and excavate soil from the spill area. R360 will temporarily take down the fence to remove soils from the base of the perimeter berm to the western side of the defined area. Soil will be excavated to approximately 2 feet below ground level. The soil and vegetation will be disposed at the Site in the area permitted by OCD for soil disposal. This material will be manifested using form C-138. The bottom of the excavation will be lined with a 20-mill thickness polyethylene liner and filled with clean soil acquired from a near-by source. The fence will be replaced and the affected area will be seeded with BLM seed blend No. 2. Figure 4 presents the proposed soil remediation area.

R360 proposes to scrape affected vegetation from a distance of about 50 feet beyond the spill area excavation to treat part of the overspray area. The soil within this 50 foot zone will be treated with a commercially available amendment (Maxi Grow) and seeded with BLM seed blend No. 2. Appendix C presents the Maxi Grow product information.

Site personnel will also remediate the area between the pond berm and the perimeter berm by removing approximately 24 inches of impacted soils in this area. These soils will be excavated and placed in the on-site landfill cell. Manifests (C-138) will be completed for this excavation and transfer of soil. This area is about 10 feet wide and about 200 to 225 feet in length. This excavated area will be backfilled back to grade with clean soil and caliche. This area will not be planted.

4.0 REPORTING

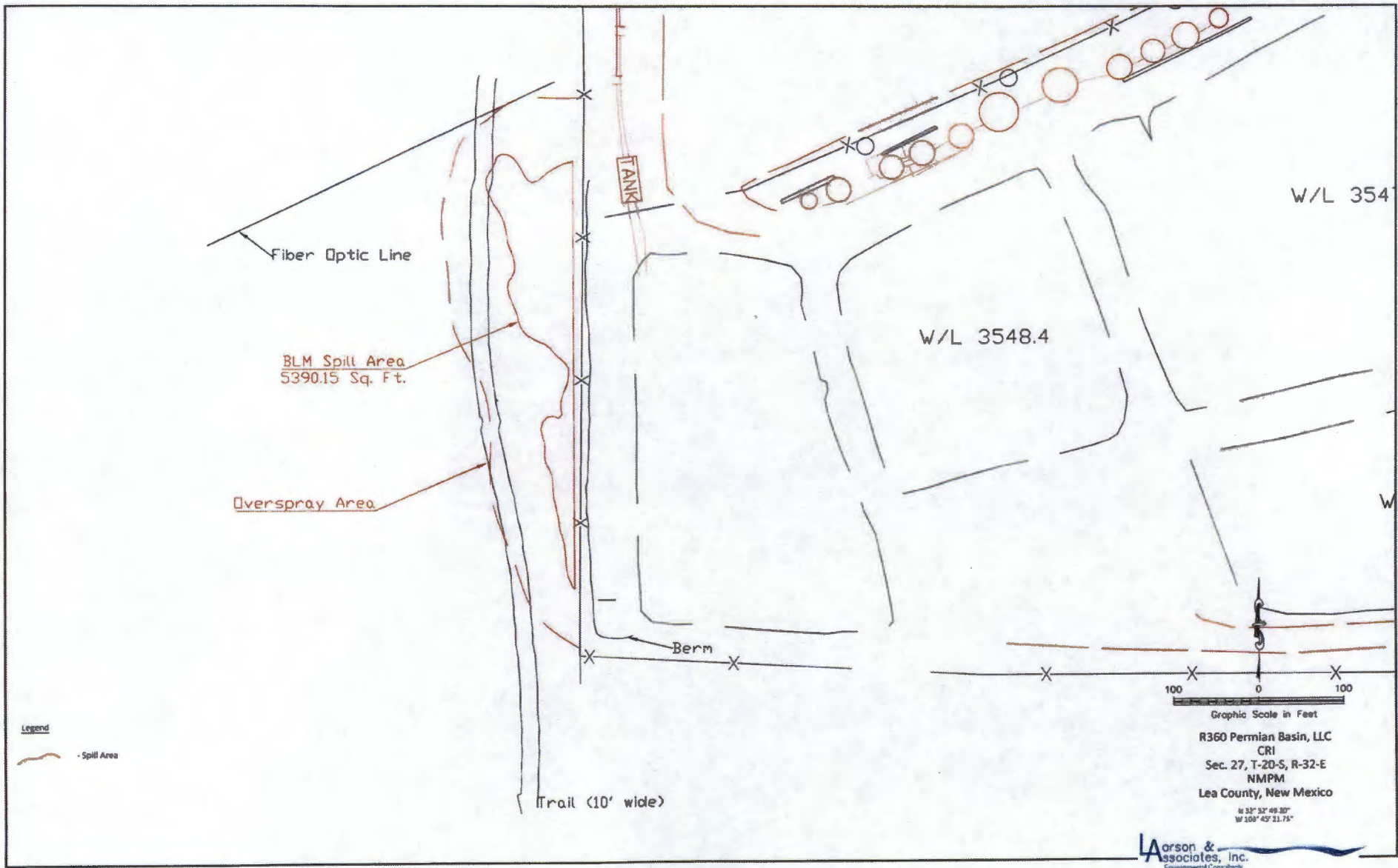
R360 will submit a report to the OCD and BLM to document the cleanup and revegetation of the spill and overspray areas. The report will be submitted within 45 days of completing the work.



Figure 1 - Topographic Map



Figure 2 - Aerial Map

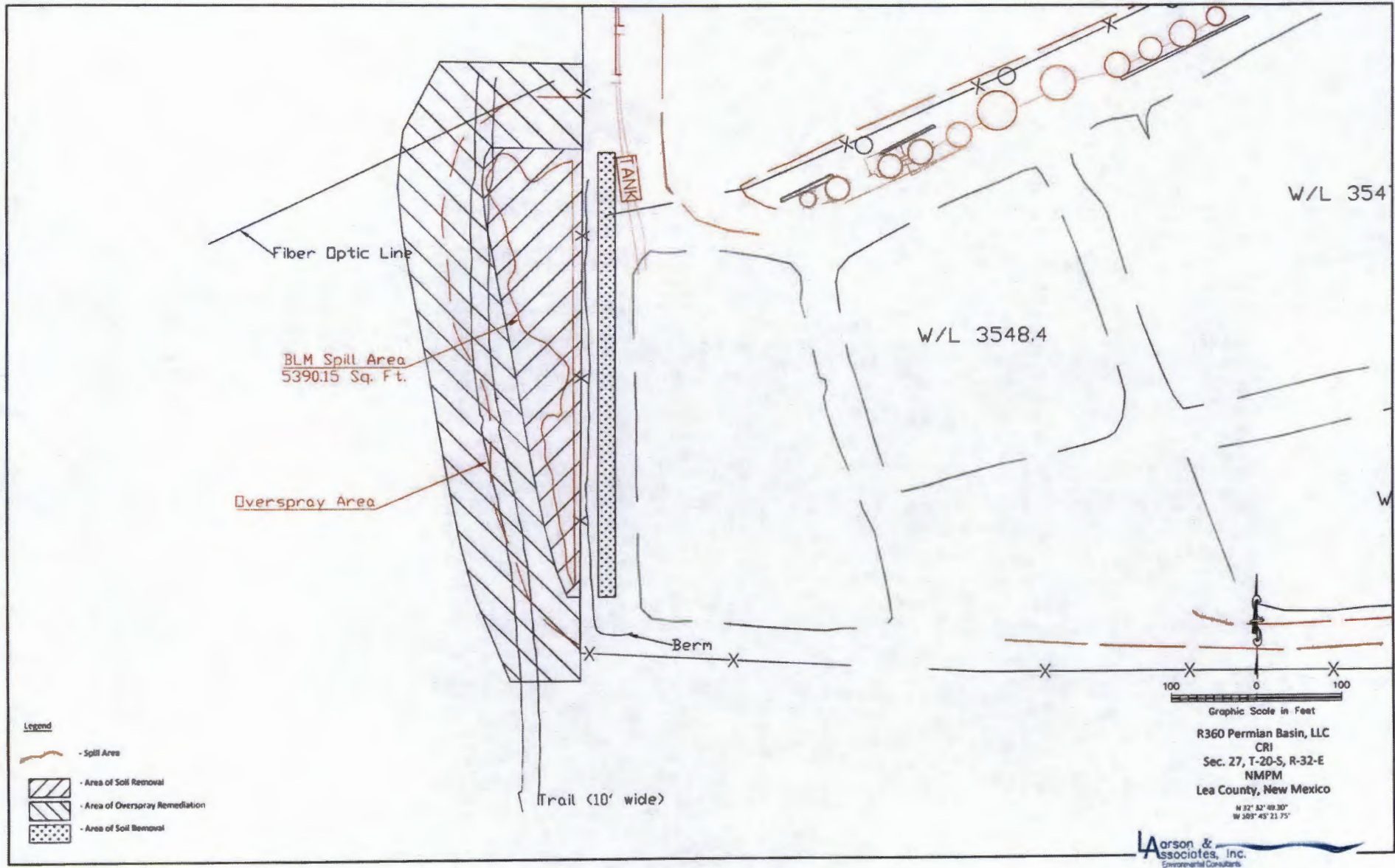


Legend

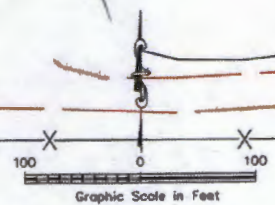
Spill Area

Figure 3 - BLM Spill Area

Larson & Associates, Inc.
Environmental Consultants



- Legend**
- Spill Area
 - Area of Soil Removal
 - Area of Overspray Remediation
 - Area of Soil Removal



R360 Permian Basin, LLC
CRI
Sec. 27, T-20-S, R-32-E
NMPM
Lea County, New Mexico
N 23° 32' 00.00"
W 103° 43' 21.75"

Larson & Associates, Inc.
Environmental Consultants

Figure 4 - Proposed Remediation Area

APPENDIX A

OCD Inspection Report and Communications

Brad

Upon the request of the BLM property lessee, the author, NMOCD- District 1 Environmental Specialist, Geoffrey Leking performed a site inspection with the BLM property lessee and David Herrell, Safety & Hazmat Coordinator, BLM on Friday 03/23/12. The subject of the site inspection was the BLM property adjacent to the R360 facility evaporation pond located in the southwest corner of the R360 property. Upon inspection, it was found that fluid from the pond had breached the pond's west side dike at two locations. Subsequently, the fluid flowed to the west on to the adjacent BLM property and then proceeded to flow west, north and south leaving darkened and chloride encrusted soils. Inspection performed south of the pond found evidence that overspray from the pond's misters had distressed and killed vegetation. The R360 facility manager joined the inspection party and stated that the dike had been breached due to excessive pond fluid levels caused by a plugged drain coupled with a rain event. The plugged drain has been corrected and R360 plans to abandon the pond(s) and build new ones to the northeast further into the interior of their property. He also stated that, prior to abandonment of the pond, they will attempt to move the misters further away from the west and south property boundaries. They will also redirect the misters' nozzles. Hopefully, these actions will prevent or minimize impact to the adjacent BLM property. I was given contact information for R360's environmental manager of the site. The environmental manager also left a voice mail at my office after the site inspection. Two photos from the site inspection are attached and additional photos are available at L:/HOBBS/R360 EVAPORATION POND. Thank you.

Geoff





Mark Larson

From: Wayne Crawley [wcrawley@r360es.com]
Sent: Thursday, April 19, 2012 9:20 PM
To: Mark Larson
Subject: FW: R360 3/23/12 Field Inspection Summary
Attachments: 1 R360.docx; DSC02322.JPG; DSC02324.JPG

From: Wayne Crawley
Sent: Thursday, April 19, 2012 11:56 AM
To: Wayne Crawley
Subject: FW: R360 3/23/12 Field Inspection Summary

From: Jones, Brad A., EMNRD [<mailto:brad.a.jones@state.nm.us>]
Sent: Thursday, March 29, 2012 6:35 PM
To: Wayne Crawley; Clayton A. McDonald
Cc: dherrell@blm.gov; Gonzales, Elidio L, EMNRD; Leking, Geoffrey R, EMNRD; VonGonten, Glenn, EMNRD
Subject: FW: R360 3/23/12 Field Inspection Summary

Wayne,

Please see the attached. It is the inspection report and photos from Oil Conservation Division's (OCD) investigation of a complaint regarding issues associated with the operation of the evaporations ponds at the CRI surface waste management facility: OCD permit NM1-006/R-9166. Please note that there are conditions within the January 23, 2004 Settlement Agreement that could have prevented and/or limited the impact to the neighboring property if implemented properly. Such conditions are as follows:

Condition D2 – "The facility will be maintained, contoured, and bermed to prevent runoff and runon of the portion of the facility containing contaminated solids and liquids." **The photos demonstrate that a facility berm does not exist at the facility boundary within the proximity of the evaporation ponds to prevent runoff**

Condition D11 – "All pits and ponds that contain liquids must have sufficient freeboard to prevent overtopping and a minimum freeboard of (1) one foot." **Maintaining the minimum freeboard of one foot should prevent overtopping due to a rain event.**

Condition D13 – "Ponds and pits will be inspected on a weekly basis and, if any defect is noted, repairs must be made as soon as possible." **The compromised integrity of the evaporation pond's slopes and the exceedance of the freeboard requirement are items that should be observed and addressed prior to the release event. **

To ensure that this issue is properly addressed, please submit an operational plan to the OCD for review and approval within 15 days of receipt of this email. The operational plan shall propose protocols, procedures and methods that CRI will implement to prevent overspray and releases of liquid oilfield waste at the facility and from leaving the surface waste management facility boundary. Also, please submit a plan to address the cleanup of the overspray and releases onto BLM property to the OCD for review and approval within 30 days of receipt of this email. The plan shall include protocols, procedures regarding the cleanup, confirmation/verification testing, restoration, re-vegetation procedures, and a generic schedule associated with the cleanup plan activities.

OCD wishes to clarify that it has not received an official submittal or proposal for replacement ponds. Such a proposal would require a major or minor modification to the existing surface waste management facility permit. This process would not address the immediate needs. If you have any questions regarding this matter, please do not hesitate contact of me.

Sincerely,

Brad

Brad A. Jones
Environmental Engineer
Environmental Bureau
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Leking, Geoffrey R, EMNRD
Sent: Thursday, March 29, 2012 2:03 PM
To: Jones, Brad A., EMNRD
Cc: dherrell@blm.gov; Gonzales, Elidio L, EMNRD
Subject: R360 3/23/12 Field Inspection Summary

Brad

Attached are the written summary and two photographs. Please let me know if you need any more information.

Dave, we are going to pursue the cleanup of the contamination. Brad will include you in future emails also. Thanks.

Geoffrey Leking
Environmental Specialist
NMOCD-Hobbs
1625 N. French Drive
Hobbs, NM 88240
Office: (575) 393-6161 Ext. 113
Cell: (575) 399-2990
email: geoffreyr.leking@state.nm.us

APPENDIX B

Photographs



1. Spill Area Viewing Southeast, April 4, 2012



2. Spill Area Viewing South, April 4, 2012



3. Spill Area Viewing South, April 4, 2012

APPENDIX C

Maxi Grow Information



Southwest Environmental Products

Ecologically Sound, Naturally Safe, Always Effective

MATERIAL SAFETY DATA SHEET

Section 1. Identification

Maxi-Gro – A broad-based microbial solution intended for the degradation of fuel, oil, Animal and human waste contamination, and various agricultural and industrial chemicals

Section 2. Identity Information / Composition

Hazardous Components
Components

Non-hazardous
Bacillus species – Azotobacter species
Pseudomonas- Azospirillus species
Blue green algae- Cyanobacter species
Mixed and blended in water

Section 3. Physical Characteristics

Specific Gravity
Boiling Point
Vapor Pressure
Appearance and Odor

1.01
Same as water
17 mm Hg
A dark brown liquid with a distinctive aroma

Section 4. Fire and Explosion Hazard

Flash Point
Flammable Limits
Extinguishing Media
Special Fire Fighting Procedures
Unusual Fire and Explosion Hazards

Non-Combustible
N/A
N/A
None
None, product is basically water

Section 5. Reactivity Data

Stability
Incompatibility

Stable
Avoid contact with sugar type materials since this is a food source that will stimulate growth of the naturally occurring bacteria

Conditions to Avoid
Hazardous Decomposition or Byproducts

Extreme Conditions
None

Section 6. Health Hazard Data

Routes of Entry
Carcinogenicity (NTP or IARC)
Signs and Symptoms of Exposure

Ingestion, skin, eyes
None
Could possibly cause diarrhea and nausea, some irritation may occur if product is splashed on skin or in eyes

Emergency and First Aid Procedures

Induce vomiting, product may cause vomiting; dilute by giving water. Flush and wash skin with clean water and soap. Flush eyes with clean water.

Section 7. Precautions for Safe Handling



Southwest Environmental Products

Ecologically Sound, Naturally Safe, Always Effective

Material Release or Spillage

Small spill: wash and dilute with water. Large spill: contain and dilute with water. Avoid discharging into domestic water supplies

Waste Disposal Method

Dilute with water and leave about ground to evaporate.

Handling and Storage Precautions

N/A

Ventilation Required

None Required

Respiratory Protection

None Required

Personal Protection

None required; use of gloves and safety glasses suggested

Work/Hygienic Practices

Routine



Greenspoint Plaza 4
16945 Northchase Drive, Suite 2200
Houston, Texas 77060
281.872.R360 (7360) Office
www.r360environmentalsolutions.com

RECEIVED OCD

2012 AUG -6 P 12: 50

July 27, 2012

Brad Jones
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 S. St Francis Drive
Santa Fe, NM 87505

**Re: R360 Spill and Overspray Remediation Report
Concerning the Solid Waste Management Facility
Located in Halfway, NM; formerly Controlled Recovery Inc.**

Mr. Jones,

In accordance with the Spill and Overspray Remediation Plan for the Controlled Recovery, Inc. Halfway facility which was submitted to the Division as of May 22nd, 2012, the following is a report of completed remediation activities.

The plan required the removal of impacted soil and vegetation along the western boundary of the facility, followed by the backfilling with clean soil and broad reseeding. A summary of these activities is provided below.

Excavation activities began on June 27th and continued until midday on the 28th. The spill impacted area where waste liquids saturated the soils (see attachment 1 for location) was excavated to a depth of 24 inches below ground surface. The vegetation and one (1) inch of top soil were removed from the overspray area that was impacted by misting activities. This resulted in the removal of approximately 312 cubic yards of material that was manifested into the Halfway Disposal Facility. Copies of these manifests are attached.

Upon the completion of excavation activities, a 20 mil PVC liner was installed within the excavated area and was anchored into the facility berm. The liner was installed with welded seams on June 28th. Documentation of this installation is attached along with pictures of the finished installation. This provides a contiguous barrier to future salt impacts in the area.

Clean backfill was obtained from an undeveloped area north of highway 62/180 within the halfway property (see attachment 1 for location). Approximately 504 cubic yards of clean top soil was used as backfill for the excavated area. The soil was



Greenspoint Plaza 4
16945 Northchase Drive, Suite 2200
Houston, Texas 77060
281.872.R360 (7360) Office
www.r360environmentalsolutions.com

lightly compacted using a large bulldozer and contoured for effective drainage by a motor grader.

On June 29th, a seeding crew was employed to reseed the work area. The crew used a small tractor and disks to till the top one inch of soil. Approximately 25 pounds of BLM seed mix #2 was hand cast over the work area and tilled into the soil. The seed was then watered immediately. The seeded area will be watered for a period of six (6) days to promote growth.

Attachment 2 contains the documentation for the disposal of excavated material, the volume of clean fill material used, the liner installation and reseeding operations. Photographs documenting of the remediation effort are located in attachment 3.

Should you have any questions or comments, please feel free to contact me at (281.873.3243).

Sincerely,

A handwritten signature in black ink, appearing to read "Zach Davis", is written over a white background.

Zach Davis
Environmental Scientist
Greenspoint Plaza 4,
16945 Northchase Drive, Suite 2200,
Houston, TX 77060

Attachments:

- Attachment 1 – Maps
- Attachment 2 – Documentation
- Attachment 3 – Pictures

cc: Wayne Crawley; Clayton McDonald; Manny Gonzalez



- Approximate Spill Area**
- Vegetation Remediation Area**
- Approximate Origin of Clean Fill**



Clean Material Location Map

Halfway	R360 ES Inc
Figure 1	July 12, 2012

Attachment 2

Documentation

Of

Disposal

CONTROLLED RECOVERY, INC.

P.O. Box 388 • Hobbs, New Mexico 88241-0388 • (575) 393-1079 • www.crihobbs.com
NMOCD Order R9166

Bill to R360 TKT NA
CM Zack
R9 N/A
 Address _____
 Company/Generator R360
 Lease Name Halfway Plant
 Trucking Company Alfredo's Vehicle Number A20 Driver (Print) Eduardo
 Date 6/28/12 Time 5:09 a.m. p.m.

Type of Material

Fluids Soils
 Tank Bottoms Other Material (List Description Below) Receiving Area 50/51

DESCRIPTION

Cont. Sail (72) out
Top Sail (168) in

Volume of Material Bbls. Yard 72 Gallons
 Wash Out Call Out After Hours Debris Charge

GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

- RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste.
- RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)
- MSDS Information RCRA Hazardous Waste Analysis Process Knowledge Other (Provide description above)

CRI Approval # _____

Agent Eduardo
 (Signature)

CRI Representative Peppin
 (Signature)

TANK BOTTOMS

	Feet	Inches	BS&W/BBLS Received	BS&W	%
1st Gauge					
2nd Gauge			Free Water		
Received			Total Received		

240924

CONTROLLED RECOVERY, INC.

P.O. Box 388 • Hobbs, New Mexico 88241-0388 • (575) 393-1079 • www.crihobbs.com
NMOCD Order R9166

Bill to R360 TKT NA
 Address _____ CM Zach
 _____ Rig RIA
 Company/Generator R360
 Lease Name Halgum Plant
 Trucking Company Abel's (Alfred) Vehicle Number 01 Driver (Print) Alex
 Date 6/28/12 Time 5:04 a.m. p.m.

Type of Material

Fluids Soils
 Tank Bottoms Other Material (List Description Below) Receiving Area 50/51

DESCRIPTION

Cont. Soil (108) yards out
Top Soil in (168) yards

Volume of Material Bbls. _____ Yard 108 Gallons _____
 Wash Out Call Out After Hours Debris Charge

GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1980 regulatory determination, the above described waste is: (Check the appropriate classification)

- RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste.
 RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

MSDS Information RCRA Hazardous Waste Analysis Process Knowledge Other (Provide description above)

CRI Approval # _____

Agent Alyandio Rojas
 (Signature)

CRI Representative O. Peppin
 (Signature)

TANK BOTTOMS

	Feet	Inches		
1st Gauge			BS&W/BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

CONTROLLED RECOVERY, INC.

P.O. Box 388 • Hobbs, New Mexico 88241-0388 • (575) 393-1079 • www.crihobbs.com
NMOCD Order R9166

Bill to R360 TKT NA
 Address _____ Cm Zaeh
 _____ RIG NA
 Company/Generator R360
 Lease Name Halway Plant
 Trucking Company Alfredo's Vehicle Number A11 Driver (Print) Demetrio
 Date 6/28/12 Time 5:01 a.m./p.m. (p.m.)

Type of Material

- Fluids Soils
 Tank Bottoms Other Material (List Description Below)

Receiving Area 50/51

DESCRIPTION

Cont Sail (132) yard out
Top Sail in (168) yards

Volume of Material Bbls. _____ Yard 132 Gallons _____
 Wash Out Call Out After Hours Debris Charge

GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS

I hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1989 regulatory determination, the above described waste is: (Check the appropriate classification)

RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste.

RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

- MSDS Information RCRA Hazardous Waste Analysis Process Knowledge Other (Provide description above)
 CRI Approval # _____

Agent Demetrio Ruiz A.
 (Signature)

CRI Representative O Peppin
 (Signature)

TANK BOTTOMS

	Feet	Inches		
1st Gauge			BS&W/BBLS Received	BS&W %
2nd Gauge			Free Water	
Received			Total Received	

Fuson Industrial Maintenance, LLC

PO Box 5009

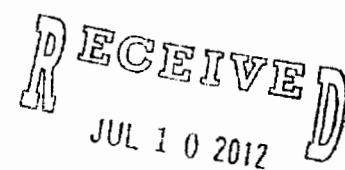
Carlsbad, NM 88221-5009

Invoice

Date	Invoice #
6/29/2012	3230

Bill To
Clayton McDonald 4507 W Carlsbad Hwy Hobbs, NM 88240

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
1	06/29/2012- Equipment, labor, and materials on location to re-seed location on West Side of Halfway Facility with #2 BLM Seed Mix Maxi Grow. Ordered by: Zach Davis w/ R360 Environmental 972.768.3359 Location: West Side of Halfway Facility NM 62/180 Hwy Sales Tax	2,375.00 5.75%	2,375.00 136.56
			

Thank you for your business.

Phone #	Fax #	E-mail
575-234-3334	575-887-3335	fusonindustrial@msn.com

Total

\$2,511.56



AKOME, INC.

P.O. Box 2038 • Hobbs, N.M. 88241-2038 • Phone 575 393•2910 • Fax 575 397•0042

INVOICE NO.: 14353
INVOICE DATE: 06/28/2012

CONTROLLED RECOVERY INC.
ATTN: CLAY MCDONALD
PO BOX 388
HOBBS, NM 88240

RECEIVED
JUL 05 2012

W/O DATE: 06-28-12
LEASE: HALFWAY BAR
AKOME TICKET: #16320 - SEE ATTACHED

CAM 7/2012
Remediation
Project per
Wayne Crowley

Bill To: 1100-CRI

** WE APPRECIATE YOUR BUSINESS **

QTY	DESCRIPTION	PRICE	AMOUNT
	PIT LINING		0.00
	MATERIAL/LABOR TO INSTALL 20 BBR LINER AS ORDERED		0.00
7,200	20 BBR FT2	0.34	2,448.00
3	LABOR	90.00	270.00
1	WEDGE WELDER RENTAL	200.00	200.00
Sub Total:			2,918.00
Sales Tax: NM (6.8125 %):			198.79
PLEASE PAY THIS AMOUNT:			\$ 3,116.79

Attachment 3

Photographs



Initial excavation cut



Excavation work at the end of day 1



North end of the installed liner



Completed liner installation, with liner keyed into the facility berm



Initial placement of clean fill material



Pushing clean fill over the liner



The entire excavated area is back filled with clean material and additional material is placed to enhance the top soil of the scraped area.



Watering in the BLM seed mix #2