

NM1 - ____ 11 ____

**Minor
Modification
Request &
Approval**

April 7, 2017

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



April 7, 2017

Morris D. Young
Envirotech, Inc.
5796 US Highway 64
Farmington, New Mexico 87401

**RE: Request For Minor Modification Of Surface Waste Management Permit NM1-0011
Envirotech, Inc.
Commercial Landfarm #2: Permit NM1-011
Location: NW/4 Section 6, Township 26 North, Range 10 West, NMPM
San Juan County, New Mexico**

Dear Mr. Young:

The Oil Conservation Division (OCD) has completed reviewed Envirotech, Inc.'s (Envirotech) permit minor modification request, dated April 3, 2017 and the supplemental Form C-137A dated April 6, 2017, to utilize EPA Method 8015 modified (C₆ - C₃₆) in lieu of EPA Method 418.1 to conduct all future vadose zone and treatment zone monitoring. Envirotech also requests to utilize the total petroleum hydrocarbons (TPH) requirements specified in 19.15.36.15.D NMAC, of 2500 mg/kg by EPA Method 8015 modified to apply for successive lifts in lieu of the remediation standard for TPH of 100 mg/kg, as specified in Condition 11 *Landfarm Operation* of the existing permit NM1-011.

OCD hereby grants Envirotech approval of the above referenced minor modification requests to utilize EPA Method 8015 modified (C₆ - C₃₆) in lieu of EPA Method 418.1 to conduct all future vadose zone and treatment zone monitoring and to comply the TPH requirements of 19.15.36.15.D NMAC in regards to future successive lift demonstrations.

Please be advised that approval of this request does not relieve Envirotech of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve Envirotech of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact Brad Jones on my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

Jim Griswold
Environmental Bureau Chief

JG/baj

cc: OCD District III Office, Aztec

Jones, Brad A., EMNRD

From: enviro admin <enviroadmin@envirotech-inc.com>
Sent: Thursday, April 6, 2017 11:53 AM
To: Jones, Brad A., EMNRD
Cc: Greg Crabtree
Subject: Application for Minor Modification to Surface Waste Water Management Facility
Attachments: Application for Minor Modification to Surface Waste Management Facility.pdf

Good Afternoon—

Please find attached the C-137A Application for Minor Modification to Surface Waste Water Management Facility.

Please let me know if you need anything else.

Sincerely,

Glenna Lawrence

Environmental Administrator

Envirotech, Inc. | 5796 US Highway 64 | Farmington, NM 87401

505.632.0615 Office | 505.632.1865 Fax | 505.947.8326 Cell



<http://envirotech-inc.com/>

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., 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

For State Use Only:

Form C-137A
June 30, 2016

Submit 1 Copy to Santa Fe Office

**APPLICATION FOR MINOR MODIFICATION TO SURFACE WASTE
MANAGEMENT FACILITY**

1. Operator: Envirotech, Inc.
Address: 5796 US Hwy 64, Farmington, NM 87401
Contact Person: Morris Young Phone: 505-632-0615
2. Location: /4 NW /4 Section 6 Township 26N Range 10W
3. Provide permit number NM1-0011
4. Attach a description of the proposed minor modification(s) to the surface waste management facility.
5. If the Minor Modification involves changes to a treatment, remediation, or disposal method, attach engineering designs, certified by a registered professional engineer, including technical data on the design elements of each applicable treatment, remediation, and disposal method and detailed designs of surface impoundments.
6. If the Minor Modification will affect the closure and post-closure plan, attach an updated closure and post closure plan, including a responsible third party contractor's cost estimate, sufficient to close the surface waste management facility in a manner that will protect fresh water, public health, and the environment (the closure and post closure plan shall comply with the requirements contained in 19.15.36.18 NMAC).
7. If the Minor Modification will affect the contingency plan, attach an updated contingency plan that complies with the requirements of Subsection N of 19.15.36.13 NMAC and with NMSA 1978, Sections 12-12-1 through 12-12-30, as amended (the Emergency Management Act).
8. If the Minor Modification will affect the control of run-on or run-off water at the site, attach an updated plan to control run-on water onto the site and run-off water from the site that complies with the requirements of Subsection M of 19.15.36.13 NMAC.
9. If the Minor Modification will affect the best management practice plan, attach a best management practice plan to ensure protection of fresh water, public health, and the environment.
10. The division may require additional information to demonstrate that the surface waste management facility's operation will not adversely impact fresh water, public health, or the environment and that the surface waste management facility will comply with division rules and orders.

11. CERTIFICATION

I hereby certify that the information submitted with this application is true, accurate, and complete to the best of my knowledge and belief.

Name: Morris D. Young

Title: President

Signature: 

Date: April 6, 2017

E-mail Address: _____



April 3, 2017

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: ENVIROTECH'S REQUEST FOR MINOR MODIFICATION OF SURFACE WASTE MANAGEMENT
FACILITY PERMIT #NM01-0011

Dear Mr. Jones:

Envirotech would like to request a minor modification for Envirotech's permit #NM01-0011.

Envirotech would first like to request to utilize Method 8015 Modified (GRO/DRO/ORO) in lieu of method 418.1 to conduct all future vadose and treatment zone monitoring. Envirotech would test carbon ranges C₆ to C₃₆ via Method 8015 Modified to satisfy the treatment and vadose zone monitoring requirements.

Secondly, Envirotech would like to change the endpoint remediation goal of 100 mg/kg TPH as specified in Landfarm Operation condition 11 of Envirotech's permit. Envirotech is requesting to utilize the TPH requirement in NMAC 19.15.36.15 D of 2500 mg/kg by method 8015 Modified to apply for successive lifts.

Thank you for your consideration in this matter. If you have any questions or require additional information, please do not hesitate to contact our office at (505) 632-0615.

Respectfully submitted,
Envirotech, Inc.

A handwritten signature in black ink, appearing to read 'Morris D. Young', written over a horizontal line.

Morris D. Young
President
myoung@envirotech-inc.com