NM1 - <u>65</u>

PART 36 PERMIT APPLICATION Attachments 1-5 1 of 3 June 28, 2019



June 27, 2019

New Mexico Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mmexico 87505

Telephone: (812) 706-9135

RE: Envirotech Landfarm #4 C-137 Application Submittal

Enclosed please find the C-137 Application and supporting documentation for Envirotech proposed Landfarm #4. Envirotech has provided two (2) hard copies and one (1) electronic copy of the Application Packet.

We appreciate the opportunity to be of service. If you have any questions or require additional information, please contact our office at (505) 632-0615.

Respectfully Submitted, ENVIROTECH, INC.

Greg Crabtree Environmental Manager gcrabtree@envirotech-inc.com

Enclosure: C-137 Application Packet



Landfarm #4 Application Submittal

June 2019



TABLE OF CONTENTS

C-137 Application

Attachment 1: Names and Addresses of Applicant and Managers

Attachment 2: Landfarm Plat

Attachment 3: Names and Addresses of Surrounding Property Owners

Attachment 4: Facility Description

Attachment 5: Engineering Designs

Attachment 6: Landfarm Management Plan

Attachment 7: Inspection and Maintenance Plan

Attachment 8: H2S Contingency Plan

Attachment 9: Closure and Post Closure

Attachment 10: Emergency Contingency Plan

Attachment 11: Stormwater Plan

Attachment 12: Best Management Practices

Attachment 13: Siting Requirements

Attachment 14: Hydrogeologic Site Description

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-137 Revised August 1, 2011 Submit 1 Copy to Santa Fe Office

APPLICATION FOR SURFACE WASTE MANAGEMENT FACILITY

A meeting should be scheduled with the Division's Santa Fe office Environmental Bureau prior to pursuing an application for a surface waste management facility in order to determine if the proposed location is capable of satisfying the siting requirements of Subsections A and B of 19.15.36.13 NMAC for consideration of an application submittal.

1	Application:	X New	Modification	🗌 Re	newal	
2.	Type: Evaporation	lnjection	Treating Plant	🗌 Landfill	X Landfarm	Other
3.	Facility Status:	X Co	mmercial	Ce	entralized	
4.	Operator: Envirotech, I	nc.				
	Address: 5796 US Hwy	64 Farmington	n, NM 87401			and the second
	Contact Person: Greg Ca	son: Greg Crabtree		Phone:	505-632-0615	
5.	Location:/4	/4	Section 6,7 and 8	Township	26N Rang	ge10W
6.	Is this an existing facility	? 🗌 Yes 🛛	🛾 No If yes, provid	le permit numbe	r	

7. Attach the names and addresses of the applicant and principal officers and owners of 25 percent or more of the applicant. Specify the office held by each officer and identify the individual(s) primary responsible for overseeing management of the facility. see Attachment 1

8. Attach a plat and topographic map showing the surface waste management facility's location in relation to governmental surveys (quarter-quarter section, township and range); highways or roads giving access to the surface waste management facility site; watercourses; fresh water sources, including wells and springs; and inhabited buildings within one mile of the site's perimeter. see Attachment 2

9. Attach the names and addresses of the surface owners of the real property on which the surface waste management facility is sited and surface owners of the real property within one mile of the site's perimeter. see Attachment 3

10. Attach a description of the surface waste management facility with a diagram indicating the location of fences and cattle guards, and detailed construction/installation diagrams of pits, liners, dikes, piping, sprayers, tanks, roads, fences, gates, berms, pipelines crossing the surface waste management facility, buildings and chemical storage areas. see Attachment 4

11. 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. see Attachment 5

12. Attach a plan for management of approved oil field wastes that complies with the applicable requirements contained in 19.15.36.13, 19.15.36.14, 19.15.36.15 and 19.15.36.17 NMAC. see Attachment 6

13. Attach an inspection and maintenance plan that complies with the requirements contained in Subsection L of 19.15.36.13 NMAC. see Attachment 7

14. Attach a hydrogen sulfide prevention and contingency plan that complies with those provisions of 19.15.3.118 NMAC that apply to surface waste management facilities. see Attachment 8

15. Attach a 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, safety and the environment (the closure and post closure plan shall comply with the requirements contained in Subsection D of 19.15.36.18 NMAC). see Attachment

16 Attach a 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). see Attachment 10

17. Attach a 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. see Attachment 11

18. In the case of an application to permit a new or expanded landfill, attach a leachate management plan that describes the anticipated amount of leachate that will be generated and the leachate's handling, storage, treatment and disposal, including final post closure options. N/A

19. In the case of an application to permit a new or expanded landfill, attach a gas safety management plan that complies with the requirements of Subsection O of 19.15.36.13 NMAC -N/A

20. Attach a best management practice plan to ensure protection of fresh water, public health, safety and the environment. see Attachment 12

21. Attach a demonstration of compliance with the siting requirements of Subsections A and B of 19.15.36.13 NMAC.

see Attachment 13

22. Attach geological/hydrological data including:

a map showing names and location of streams, springs or other watercourses, and water wells within one mile of (a) the site:

laboratory analyses, performed by an independent commercial laboratory, for major cations and anions; benzene, **(b)** toluene, ethyl benzene and xylenes (BTEX); RCRA metals; and total dissolved solids (TDS) of ground water samples of the shallowest fresh water aquifer beneath the proposed site;

(c) depth to, formation name, type and thickness of the shallowest fresh water aquifer;

(d) soil types beneath the proposed surface waste management facility, including a lithologic description of soil and rock members from ground surface down to the top of the shallowest fresh water aquifer;

geologic cross-sections; (e)

potentiometric maps for the shallowest fresh water aquifer; and **(f)**

porosity, permeability, conductivity, compaction ratios and swelling characteristics for the sediments on which (g) the contaminated soils will be placed. see Attachment 14

23. In the case of an existing surface waste management facility applying for a minor modification, describe the proposed change and identify information that has changed from the last C-137 filing. N/A

24. The division may require additional information to demonstrate that the surface waste management facility's operation will not adversely impact fresh water, public health, safety or the environment and that the surface waste management facility will comply with division rules and orders

25. 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: Greg C	rabtree	Titl
Signature:	Jula	Dat
F-mail Address	gcrabtree@envirotech-inc.com	

E-mail Address:

le: Environmental Manager 6/27/19 te:

Attachment #1

Names of Owners and Facility Managers

Name and Address of Applicant:

Mr. Morris D. Young Envirotech, Inc. 5796 US Hwy 64 Farmington, NM 87401 (505) 632-0615

Name and Address of Facility Managers:

Mrs. Julie Ortiz Envirotech, Inc. 5796 US Hwy 64 Farmington, NM 87401 (505) 632-0615 ext 301

Mr. Donald Ortiz Envirotech, Inc. 5796 US Hwy 64 Farmington, NM 87401 (505) 632-0615 ext 315

Mr. Greg Crabtree Envirotech, Inc. 5796 US Hwy 64 Farmington, NM 87401 (505) 632-0615 ext 327

Attachment #2

- Plat Map(Figure 1)
 - o Surveyed Facility Boundary
- San Juan County Assessor Map (Figure 2)
 o Roads and Highways/ Sec. Twp., Rng.)
- New Mexico Office of the State Engineer Map (Figure 3)
 O Water Well Information
- Topographic Map (Figure 4)
- Table 1: NMOSE Water Well Information

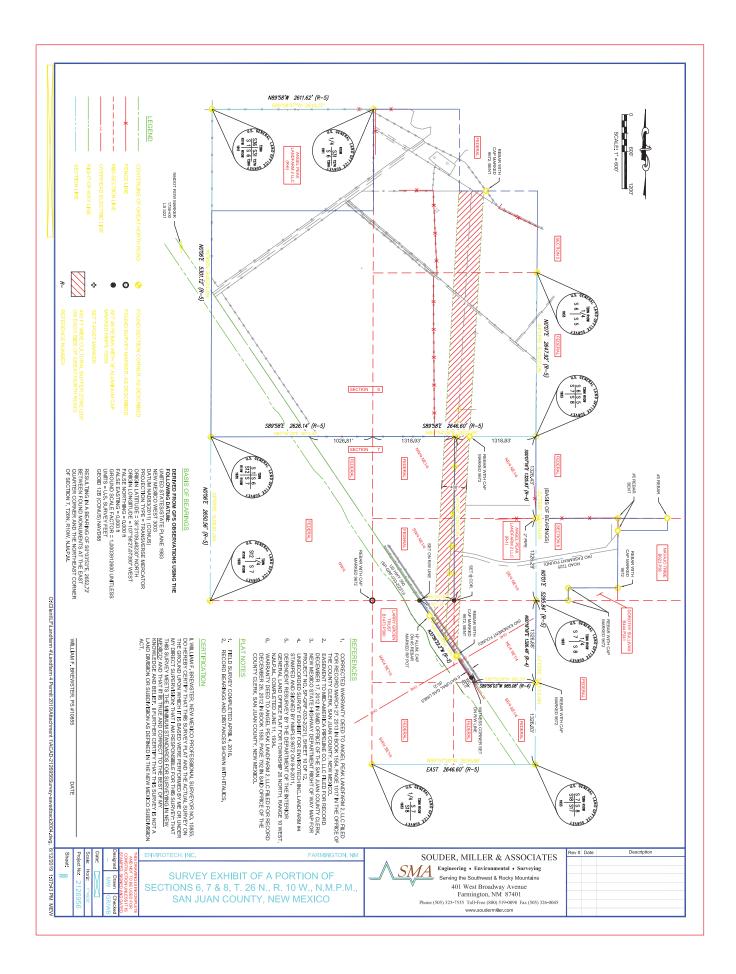
Attachment 2 discussion:

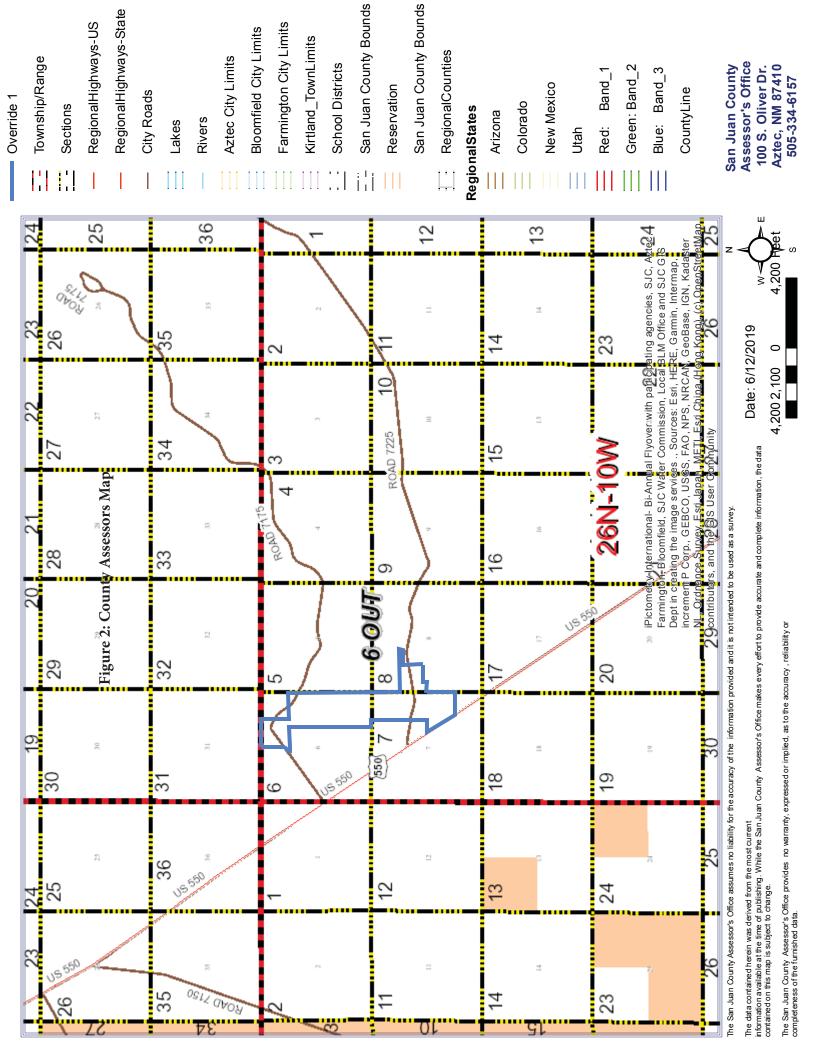
Souder Miller and Associates performed a professional survey of the property boundary of the proposed Landfarm #4 facility. This Map is presented as *Figure 1* in this Attachment. The figure shows the proposed Landfarm's spatial reference within the Public Land Survey System (PLSS). In addition to Figure 1, a map from the San Juan County Assessor's office (*Figure 2*) illustrates the location of the proposed Landfarm facility in relation to US Hwy 550 and the two County Roads (Road 7175 and 7225).

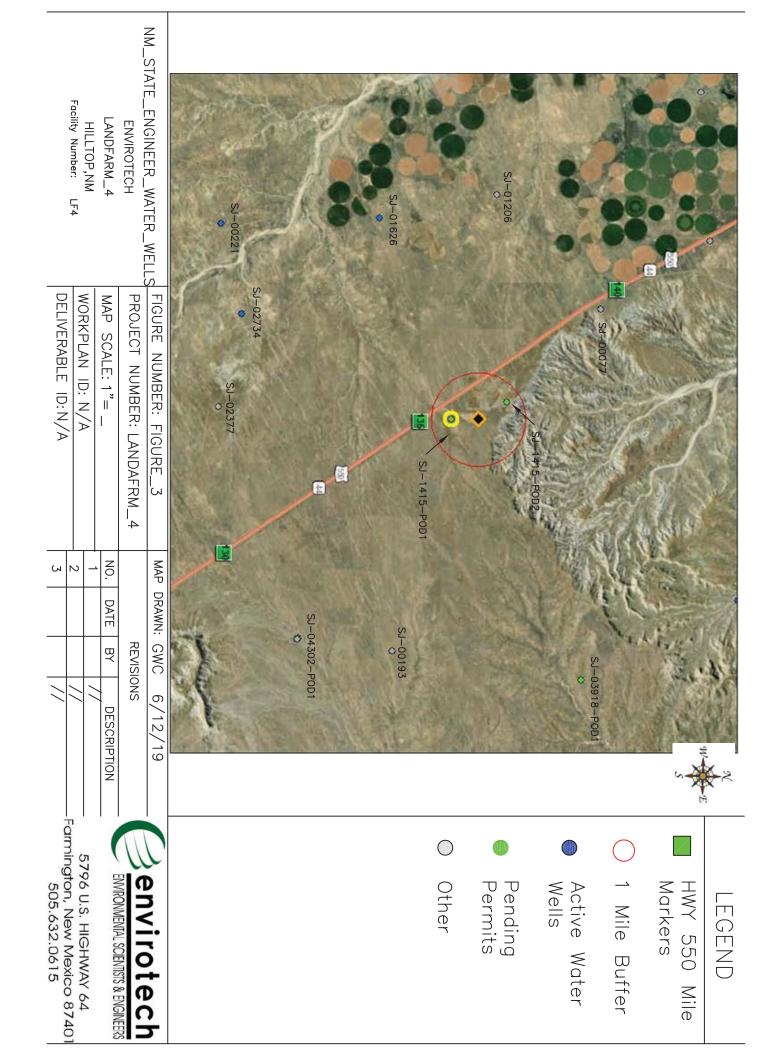
Figure 3 illustrates the location of water wells that are registered with the State Engineers office. There are 2 wells that were proposed within the one-mile radius of the proposed Landfarm. These wells were one's that Envirotech drilled to a depth of 110 feet and 40 feet respectively and did not encounter water, so they were plugged and abandoned dry holes. There are three additional wells that are located within five (5) miles of the proposed facility. These wells (SJ-01626, SJ-00077, and SJ 01206) are illustrated on Figure 3 and the data available about the wells from the State Engineers Office is presented in Table 1.

Figure 4 is a USGS Topographic Map which gives the topographic features of the area. It also illustrates the water features of the area within one mile of the proposed facility. No notable springs or other freshwater sources are noted on the map within the one-mile radius.

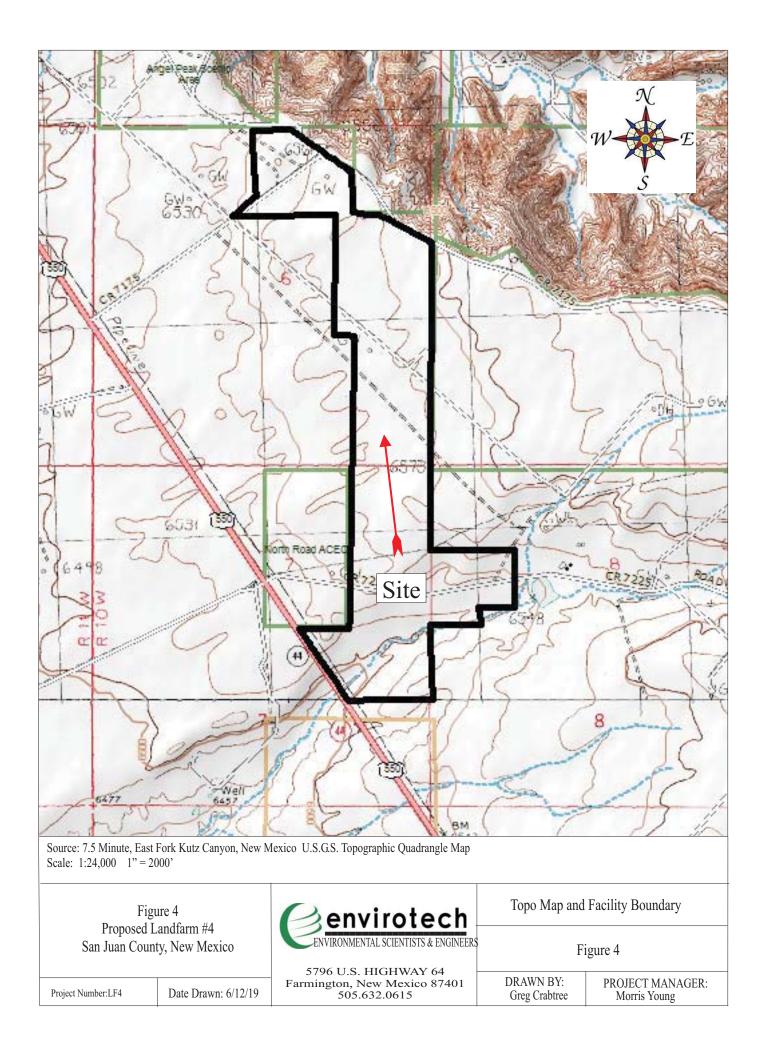
There are no known inhabited buildings within one mile of the proposed facility.







				Tai	Table 1: Water Well Information within 5 mile radius	ation with	in 5 mile r	adius			
displayName use use_of_well	use	use_of_well	status	status pod_status own	own_Iname	own_fname	depth_well	depth_water	own_fname_depth_well_depth_water_distance_to_center_utm_easting_utm_northing	utm_easting	utm_northing
SJ 01626	DOM DOM	DOM	PMT ACT		BROWN	CHARLIE Y.	255	200	7207.717	230607	4041673
SJ 00077	IND	IND INDUSTRIAL & DO DCL null	DCL		ENTERPRISE FIELD SERVICES LLC null	null	1102	550	4875.167	233964	4049155
SJ 01206	DOM null	null	PMT null		MILLER	GARY	null	null	6941.682	229945	4045723
SJ 04115 POD1 MON null	MON	null	PMT PEN		ENVIROTECH INC.	null	null	null	1522.945	237614.8	4043912.2
SJ 04115 POD2 MON null	MON	null	PMT PEN		ENVIROTECH INC.	null	null	null	635.823	237086.3	4045838.4



Attachment #3

- Names and Addresses of Surrounding Property Owners
- Parcel Map

Surface Owner Information

The surface owner of Landfarm #4 is:

Morris D. Young Young Environmental Services 5796 U.S. Highway 64 Farmington, New Mexico 87401

Owners of real property located within *one mile* of Landfarm #4's surveyed boundary is:

Morris D. Young Young Environmental Services 5796 U.S. Highway 64 Farmington, New Mexico 87401

U.S. Bureau of Land Management 6251College Blvd. Farmington, New Mexico 87401

Larry Groen Trust Post Office Box 36 Bloomfield, New Mexico 87413

Michael Schwebach 30 Road 2337 Aztec, New Mexico 87410

Wallace C. Sullivan Post Office Box 316 Keene, Texas 76059

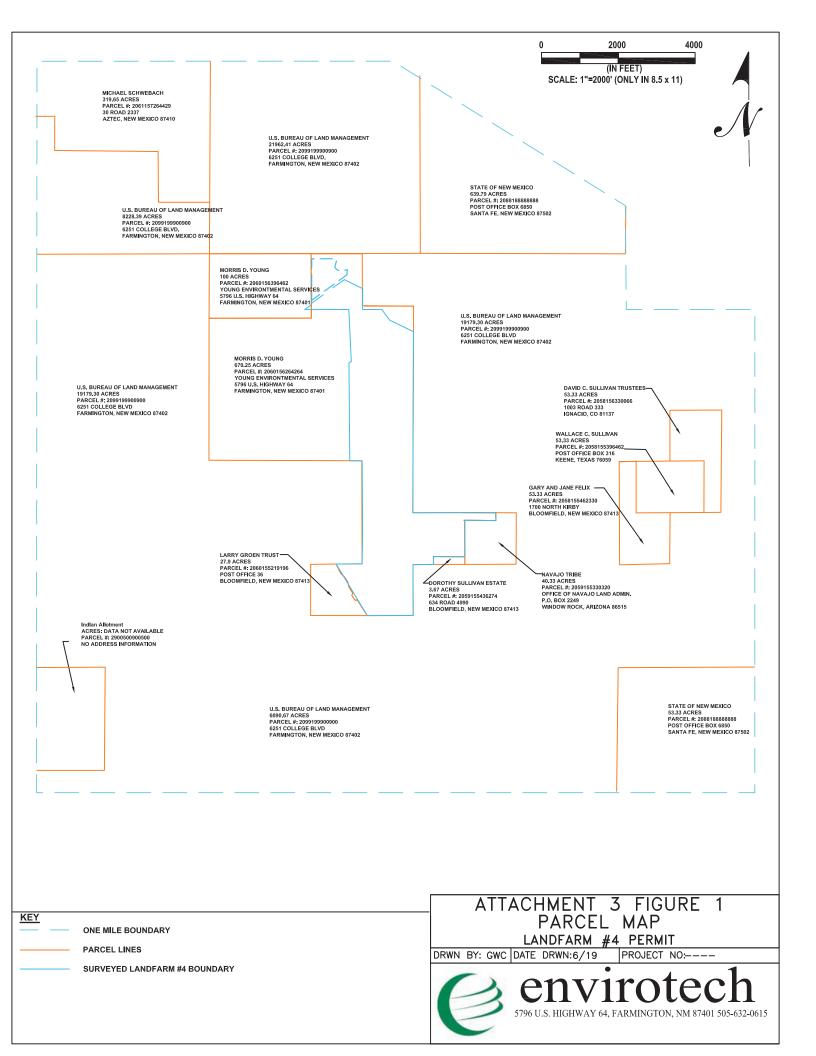
David C. Sullivan Trustees 1003 Road 333 Igancio, CO 81137

Gary and Jane Felix 1700 North Kirby Bloomfield, New Mexico 87413

Dorothy Sullivan Estate 634 Road 4990 Bloomfield, New Mexico 87413 Navajo Tribe Office of Navajo Land Administration Post Office Box 2249 Window Rock, Arizona 86515

State of New Mexico Post Office Box 6850 Santa Fe, New Mexico 87502

See Figure 1, Parcel Map for property locations in reference to Landfarm #4.



Attachment #4



Landfarm #4 Facility Description

June 2019



TABLE OF CONTENTS

1
1
1
1
2
2
3
3

Appendix: San Juan County Museum Association - Survey of Chacoan Great North Road

Figures: Figure 4A, Farmable Area Figure 4B, Facility Diagram Figure 4C, Cell Layout Figure 4D, Utility Gate Detail Figure 4E, 4-Strand Barbed Wire Fence Figure 4F, Berm Details Figure 4G, Berm Crossing Details

Introduction

The Envirotech, Inc.'s (Envirotech) Landfarm #4 is a proposed New Mexico Oil Conservation Division (NMOCD) permitted soil remediation facility. Landfarm #4 is a total of 341 acres with approximately 212.4 acres of farmable area. The farmable area was determined after subtracting the surface area of existing pipeline right of ways (ROW), oil and gas well sites, the required 100-foot facility perimeter buffer, watercourse buffer, and the Great North Road buffer from the total facility acreage; see *Figure 4A, Farmable Area*.

Landfarm #4 – North Side

The portion of Landfarm #4 located on the north side of Angel Peak Road consists of 13.8 acres, and the facility boundary will be delineated by a four-strand barbed wire fence and an earthen berm, 3-feet in height, within the fenced perimeter. Secured access will be provided via a utility gate on the northside of Angel Peak Road.

A 100-foot perimeter buffer, comprising of a 2-foot high earthen berm, will be constructed on the east, west, and north sides of the facility. The subject portion of the facility is bound to the south by Angel Peak Road; therefore, the south perimeter buffer will include a 2-foot high earthen berm located 20 feet from the edge of Angel Peak Road. Per paragraph (2) of 19.15.36.15.C NMAC, contaminated soil will not be placed within the facility perimeter buffer.

The farmable area, for the placement of contaminated soil within the subject north side of Landfarm #4, was calculated to be approximately 7 acres and is identified as Cell 1. A 2-foot high earthen berm will be constructed 100 feet from the east, west, and north sides of the fenced facility perimeter to provide delineation of the farmable area for Cell 1. The southern extent of the farmable area will be delineated by the 2-foot high berm constructed along Angel Peak Road.

Pipeline ROW

The north side of Landfarm #4 is transected by a Hilcorp Energy Company pipeline ROW. The pipeline ROW will be protected by a 2-foot high earthen berm constructed 20 feet from the centerline, which will provide a total of 40 feet for the ROW.

The attached figures illustrate details of the layout and perimeter delineation: *Figure 4B, Facility Diagram; Figure 4C, Cell Layout; Figure 4D, Utility Gate Detail; Figure 4E, 4-Strand Barb Wire Fence;* and *Figure 4F, Berm Details*.

Landfarm #4 – South Side

The portion of Landfarm #4 located south of Angel Peak Road encompasses a total of 327.2 acres, with 205.4 acres of farmable area. The Landfarm #4 portable office trailer will be located on the north side of the subject portion of Landfarm #4; see *Figure 4B*, *Facility Diagram*.

The facility boundary will be delineated by a four-strand barbed wire fence and an earthen berm, 3-feet in height, within the fenced perimeter on the north and west sides of the facility boundary.

In order to control storm water run-on along the east and south sides, a swale (diversion ditch) will be constructed between the fence and the 3-foot high perimeter berm; see *Figure 4A*, *Farmable Area* and *Figure 4F*, *Berm Details*.

The farmable area, for the placement of contaminated soil within the subject south side of Landfarm #4, was calculated to be approximately 205.4 acres and is identified as Cell 2 through 23. A 2-foot high earthen berm will be constructed 100 feet from the fenced facility perimeters to provide delineation of the farmable area for Cells 2 through 23, with the exception of the north side which is bound by Angel Peak Road. The north side will be delineated by a 2-foot high earthen berm constructed approximate 20 feet from the edge of Angel Peak Road; see *Figure 4C, Cell Layout*.

The south side of Landfarm #4 will have a total of six utility access gates, one of which exists. The existing gate is located on the south side of Angel Peak Road and identified as "Main Gate" on the attached facility diagrams. The remaining gates will be constructed to allow access to other areas of the Landfarm once it becomes active. These gates will remain closed and locked unless they need to be opened in an emergency situation.

Existing Roads

There is a total of two maintained roads that transects Landfarm #4. Angel Peak Road (County Road 7175) provides the main access to the Landfarm and also divides Cell 1 (north side) from Cells 2 through 23 (south side). County Road 7225 transects the south side of Landfarm #4 and divides Cells 2 through 19 from Cells 20 through 23, see *Figure 4C, Cell Layout*.

A third road transects the Landfarm from north to south along the west side of the southern portion of the Landfarm. The road is identified as the "Chacoan Great North Road", an archeological feature. A 200-foot long protective zone extending north from County Road 7225 will be constructed. A 3-foot high earthen berm will be constructed on each side of the archeological feature in as an added historical preservation best management practice. South of CR 7225 the protection zone extends to a width of 400 feet based on recommendations provided by Mr. Larry Barker of the San Juan County Museum Association Division of Conservation Archaeology. The detailed recommendations from Mr. Barker are provided in the attached *Appendix*.

Interior facility roads will be maintained and will parallel the perimeter berm and the most southern perimeter boundary. Additionally, an access road will parallel the protected perimeter of the West Fork Gallegos Canyon, an ephemeral stream that transects the Landfarm south of County Road 7225.

Oil and Gas Well Sites

Two active oil and gas well sites are located on the northeastern portion of the subject area, see *Figure 4B, Facility Diagram*. The well sites are recorded as being owned by Hilcorp Energy

Company and are identified as Huerfano #10R (API# 30-045-20288) and the Huerfano #528 (API# 30-045-29576). The active well sites are not within a designated farmable area for Landfarm #4.

In addition, there are two plugged and abandoned (P&A) well sites located within the permitted boundary of Landfarm #4. The first well site, located on the north side of the subject portion of the Landfarm, is identified as the Huerfano Unit, owned by El Paso Natural Gas (API 30-045-06055), and plugged in 1967. This P&A site is within the archeological boundary of the Chacoan Great North Road; therefore, is not located within a farmable area. The other well, located towards the middle of the subject area, is identified as the Huerfano #66, owned by Burlington Resources (API 30-045-06028), and plugged in 1998. Envirotech has been unable to locate this well site, but based on estimated location, the well site is near the eastern boundary of the Chacoan Great North Road archeological set back.

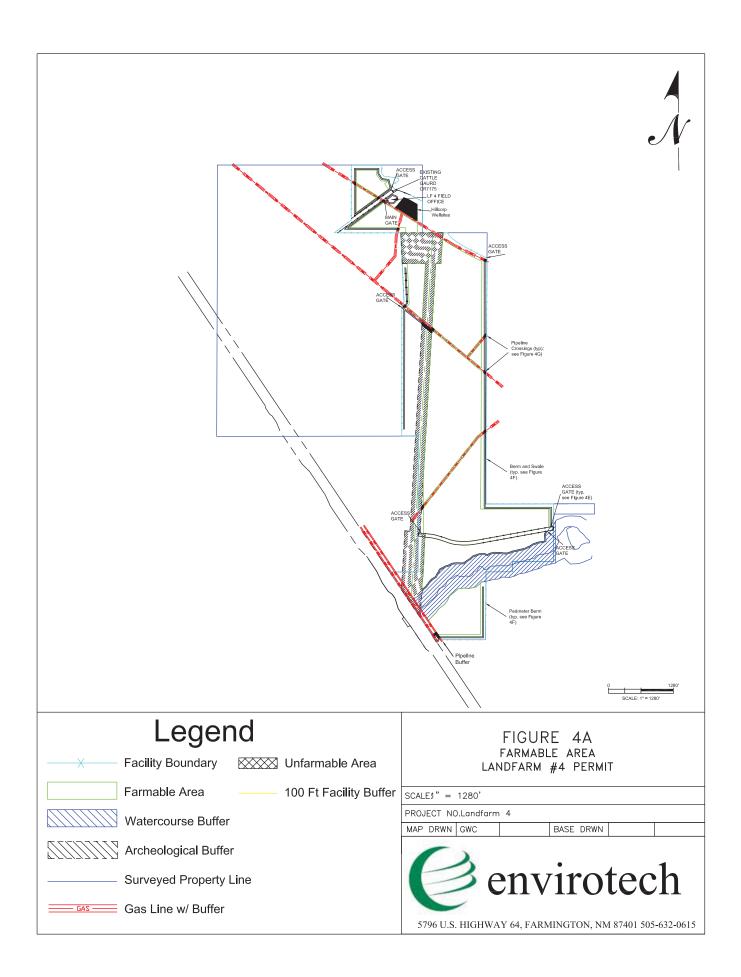
Pipeline ROWs

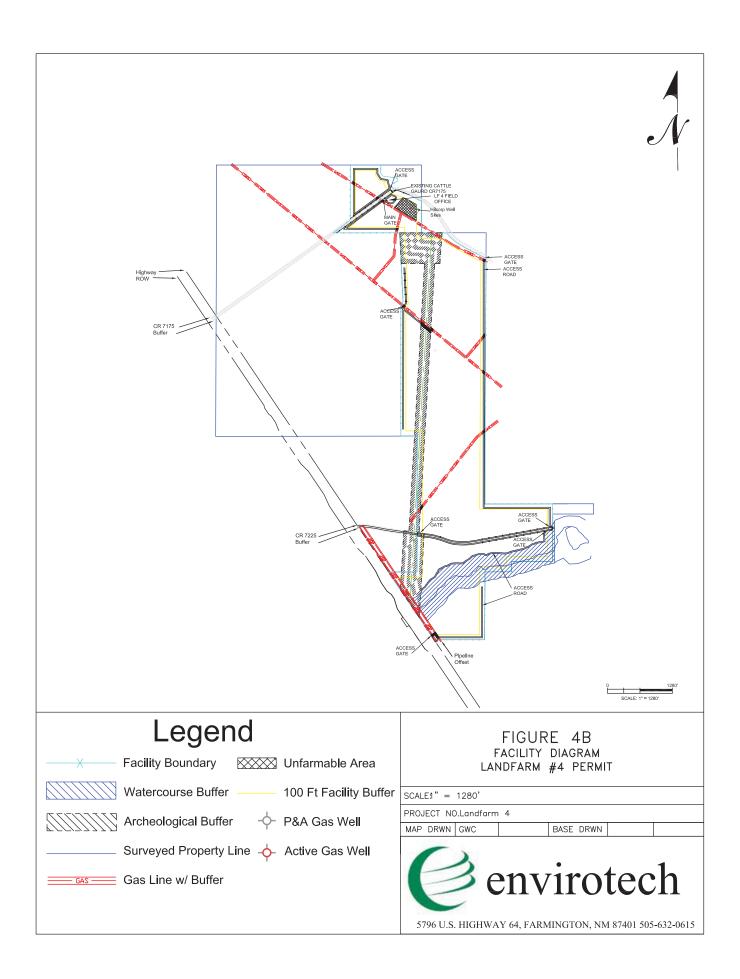
The southside of Landfarm #4 is transected by five pipelines ROWs. Two of the pipelines are located in the northern portion of the subject area and two pipelines are located near the middle portion. The most southern ROW transection begins near CR 7225 and crosses Landfarm #4 in a northeasterly direction. All pipeline ROWs will be protected by a 2-foot berm which will provide a 40-foot ROW, 20 feet on either side of the pipeline centerline; see *Figure 4B*, *Facility Diagram* and *Figure 4F*, *Berm Details*.

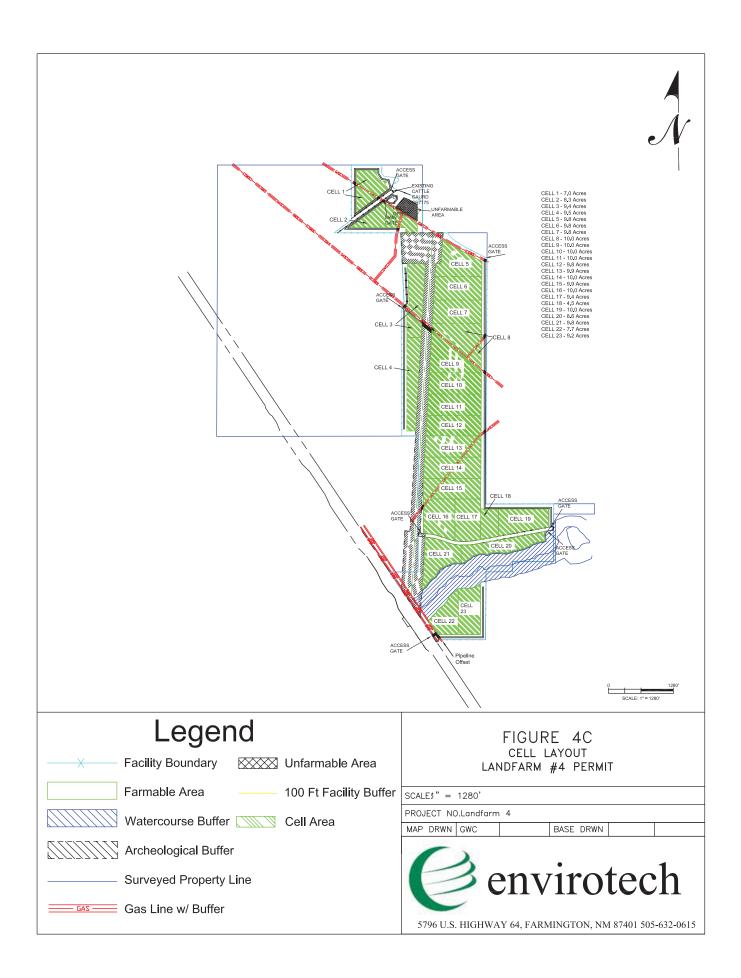
Landfarm #4 Traffic

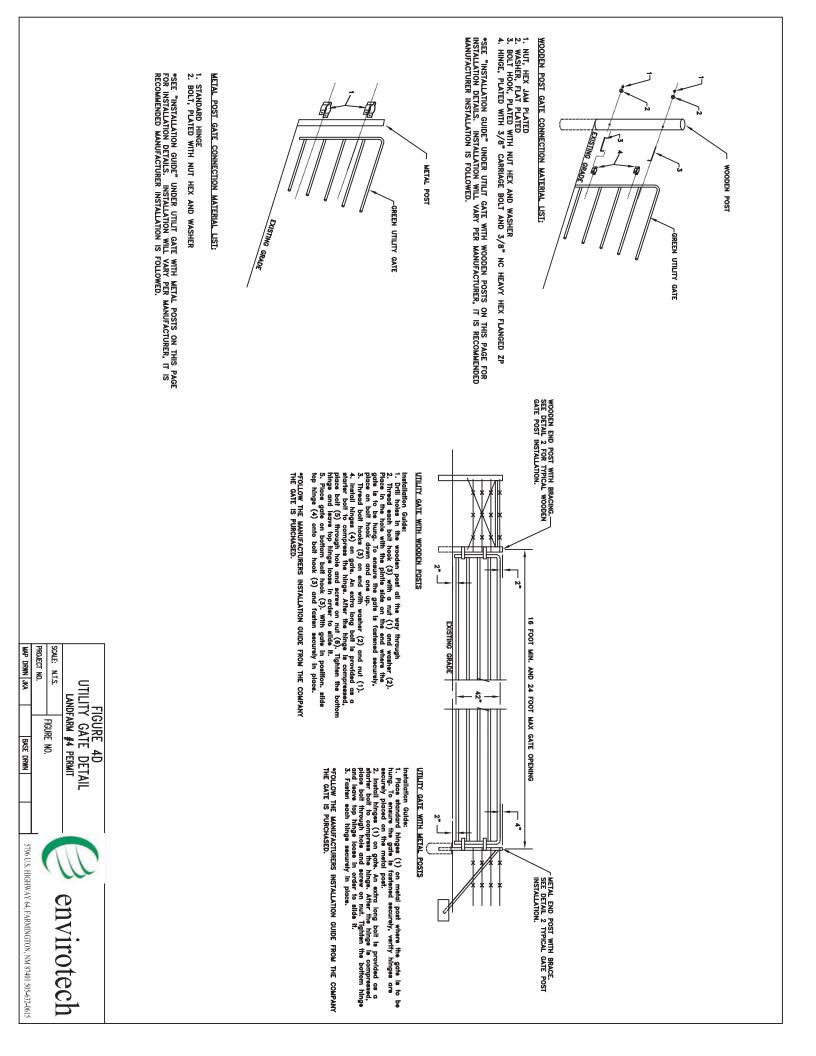
Traffic entering the north or south side of Landfarm #4 will use one of the seven (7) utility gates. Upon inspection and/or testing (paint filter and chloride) the truck will be approved for entry and a disposal cell will be assigned to the truck for the placement of soils or drill cuttings. Trucks and landfarm personnel will use the designated interior facility roads and the area between the facility perimeter berms and 100-foot buffer berm to navigate throughout the landfarm. Armored berm crossings will be installed along pipeline ROWs and the Chacoan Great North Road protection zone to gain access to all landfarm cells; see *Figure 4B, Facility Diagram* and *Figure 4G, Berm Crossing Details*.

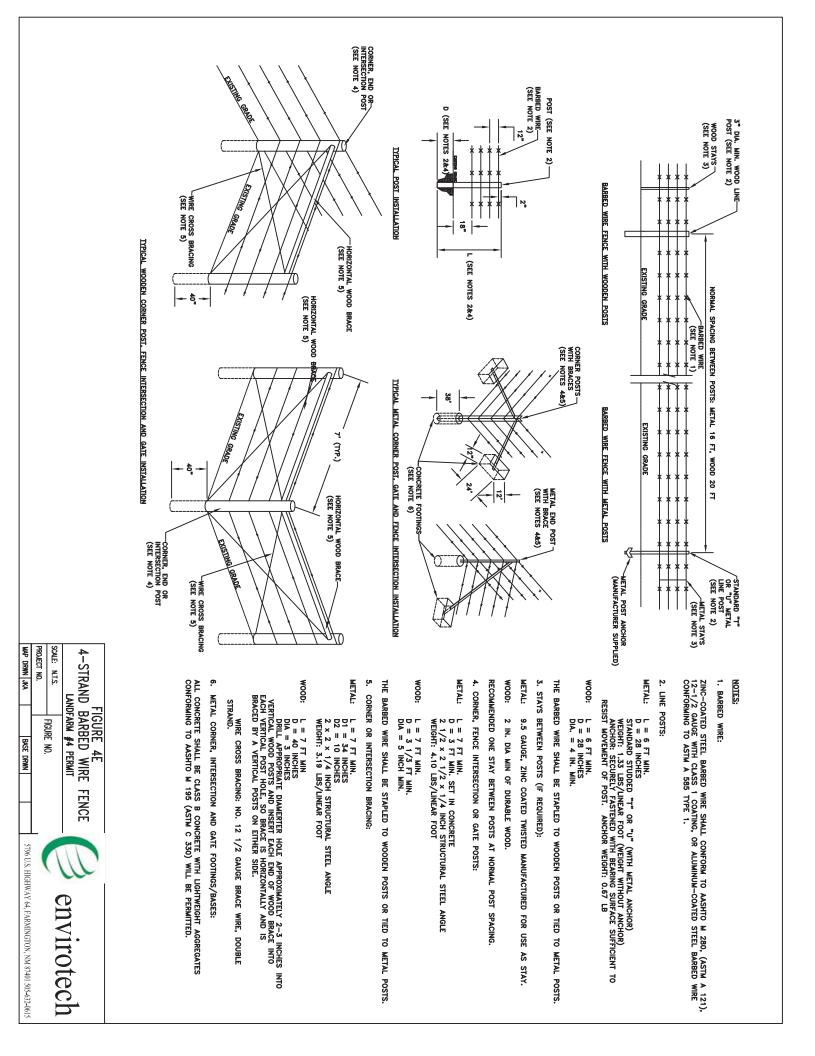
Figures

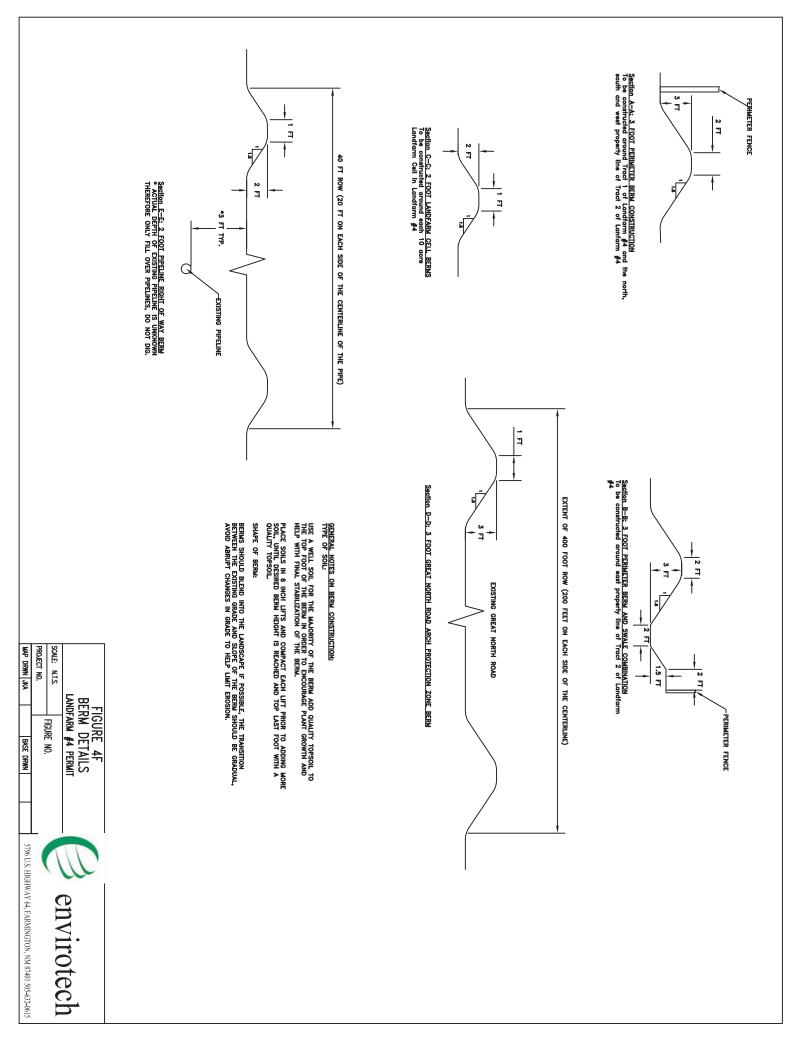


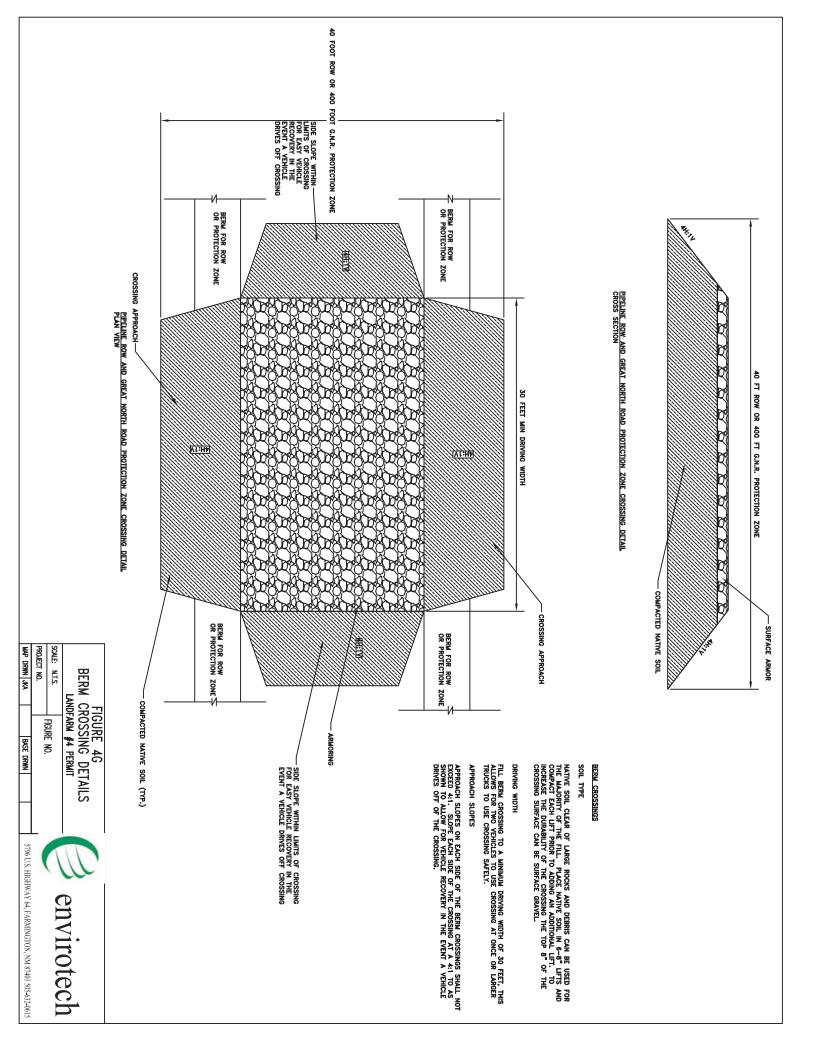












Appendix

SAN JUAN COUNTY MUSEUM ASSOCIATION

Salmon Ruins Museum Research Library Division of Conservation Archaeology Heritage Park

October 2, 2018

Mr. Morris Young Envirotech 5796 US Highway 64 Farmington, NM 87401

Re: Chacoan North Road Transecting Private Property

Dear Mr. Young:

Per your request, archaeological staff from the Division of Conservation Archaeology/Salmon Ruins Museum, once again, surveyed Segment 7 of the Chacoan Great North Road extending through your private property south of Bloomfield, New Mexico (T.26N., R. 10 W., Sections 6 & 7). Our firm's archaeologists confirmed and flagged (pink flagging) the staked, field centerline of the road and used a total of 10 meters (33 ft.) for the road width. From the center of the road, lath flagged with orange and blue was positioned 18 meters (60 ft.) from centerline of the road, east and west respectively, and serves to mark a cultural buffer along the entire length of the road from the Arena Alta Site (LA 34307) to the well pad adjacent County Road No. 7225. The Arena Alta Site was delineated along its southern margin with lath and blue flagging as a visible barrier approximately 75 meters (246 ft.) from the defined site boundary. This includes the possible berms along the road at the southeast margin of the site area. No additional features were observed along the road alignment during our pedestrian survey, however a few isolated artifacts were noted.

A map delineating the center of the North Road field alignment (shown in blue), the buffer margins, and the flagged area south of Arena Alta are shown. Please note that we have included on this map an alignment from the Bureau of Land Management Great North Road shape file, which positions the North Road alignment (shown in green) on or immediately adjacent the buffer's east side margin along the southern three quarters of its extent. I might suggest that this warrants some additional consideration related to any construction in the southern portion of the east side of the defined buffer.

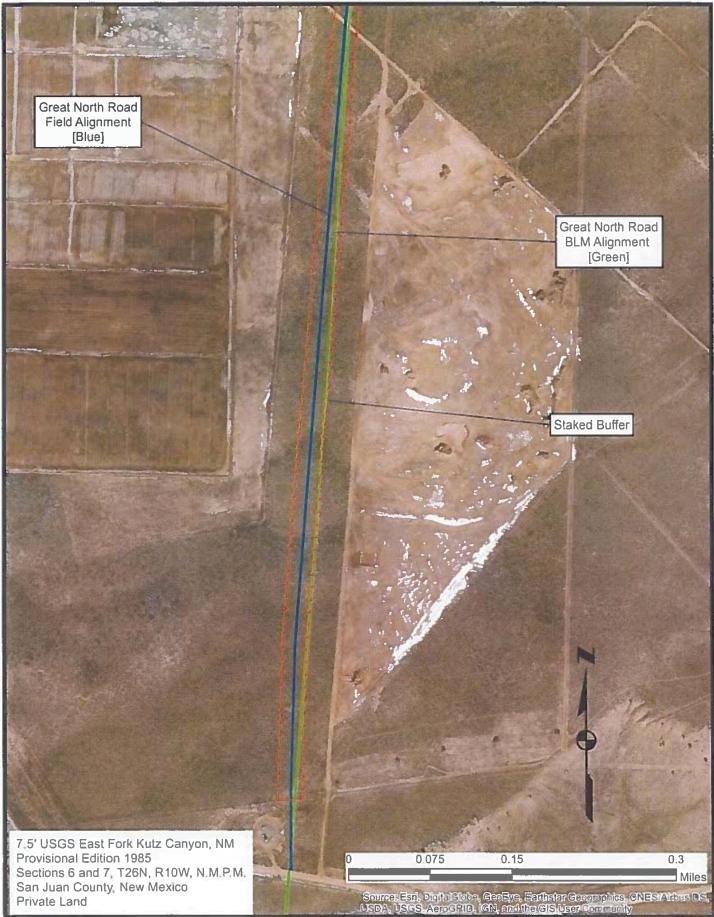
I appreciate your concern related to the preservation of the Great North Road and Arena Alta on your private fee surface. If you have any additional questions or need further assistance, please feel free to contact me.

Sincerely,

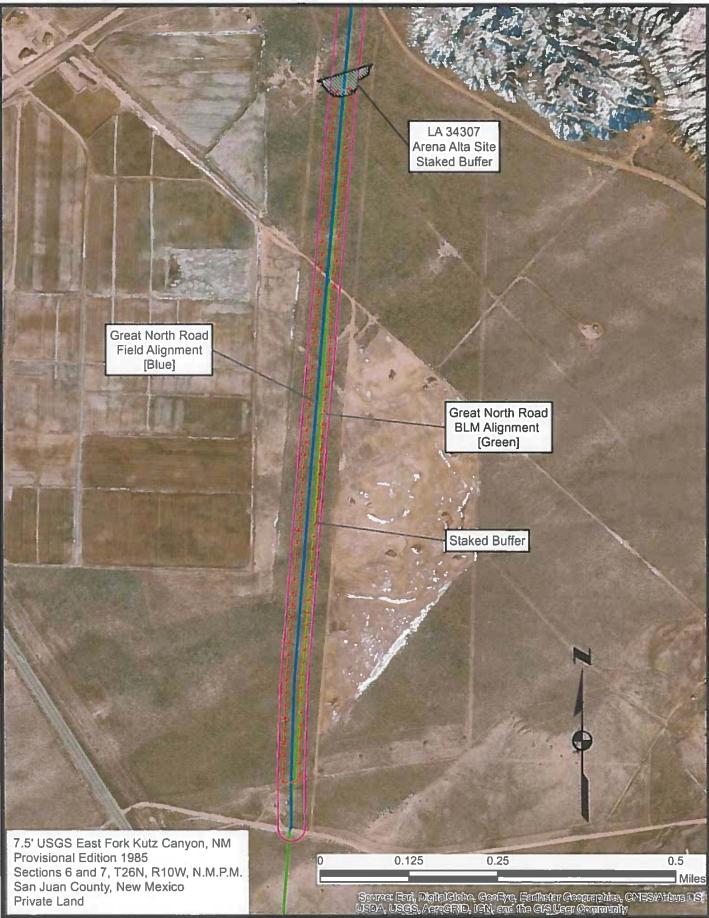
Larry L. Baker Executive Director

Post Office Box 125 • Bloomfield, New Mexico 87413 • Museum Phone (505) 632-2013 • www.salmonruins.com Museum Fax (505) 632-8633 • DCA Phone (505) 632-2733 or (505) 632-2779 • DCA Fax (505) 632-1707

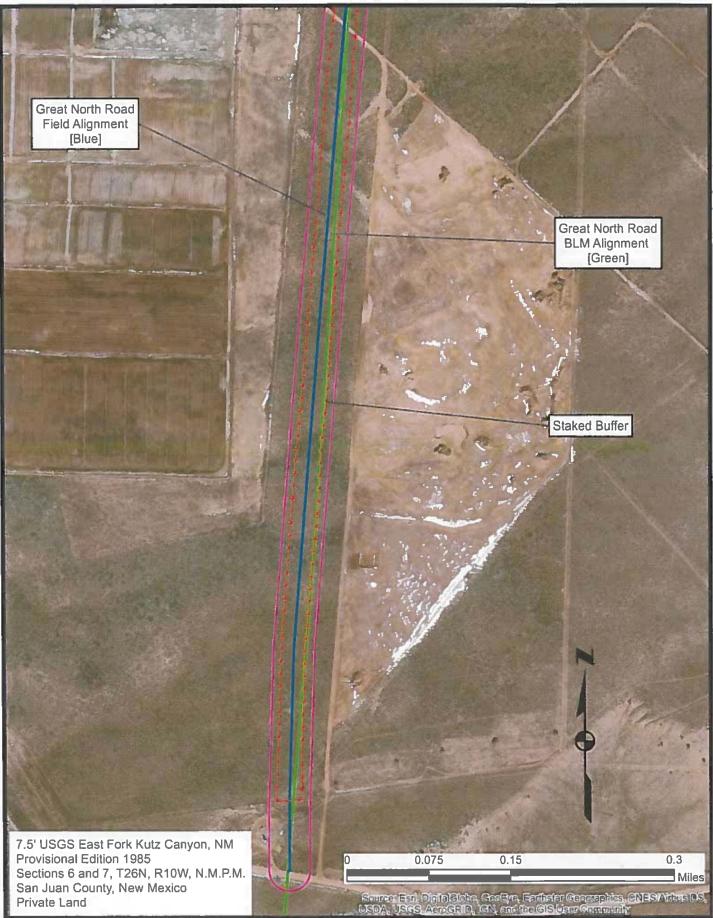
VICNITY MAP



VICNITY MAP



VICNITY MAP



SAN JUAN COUNTY MUSEUM ASSOCIATION

Salmon Ruins Museum Research Library Division of Conservation Archaeology Heritage Park

October 31, 2018

Mr. Morris Young EnviroTech 5796 US Highway 64 Farmington, NM 87401

Re: Segment of Chacoan North Road Between County Road 7225 Extending South to US Highway 550

Dear Mr. Young:

Per your request, archaeological staff from the Division of Conservation Archaeology/Salmon Ruins Museum surveyed a portion of the Chaco Great North Road, extending from County Road 7225 south to the unnamed drainage (arroyo) at the point it intersects US Highway 550. This distance is approximately 0.3 mile. Based on the Bureau of Land Management's shape file for the prehistoric road alignment, slightly less than one-half of the distance of the road's northern section in the area under consideration is at the western margin of BLM land and the remaining southern section of the road is on private land (see attached map).

Using the shape file as reference in a hand held GPS unit, our archaeologists flagged the BLM projected road centerline with lath and pink flagging and defined the prehistoric road feature as 10 meters (33feet) in width. From the centerline of the road, lath flagged with orange and blue was positioned 18 meters (60 feet) from the centerline of the road, east and west respectively, which serves to mark a buffer along the length of the current survey (see attached map for buffer designation).

Our staff's Archaeological Records Management review and pedestrian survey identified two, previously recorded archaeological sites, LA 172348 and LA 172347, as well as additional isolated artifacts. Site LA 172348 is mostly located on BLM land and LA 172347 is positioned on your private surface, both identified in 2011. Also identified in this area during earlier work is an alternate position of the North Road alignment (Site LA 119584), positioned east of the BLM shape file North Road plat and extending through Site LA 172347. This is located on your private fee surface. Site LA 172347 and the North Road alignment are not chronologically or culturally linked. Although the alternate road alignment and the BLM shape file plat of the

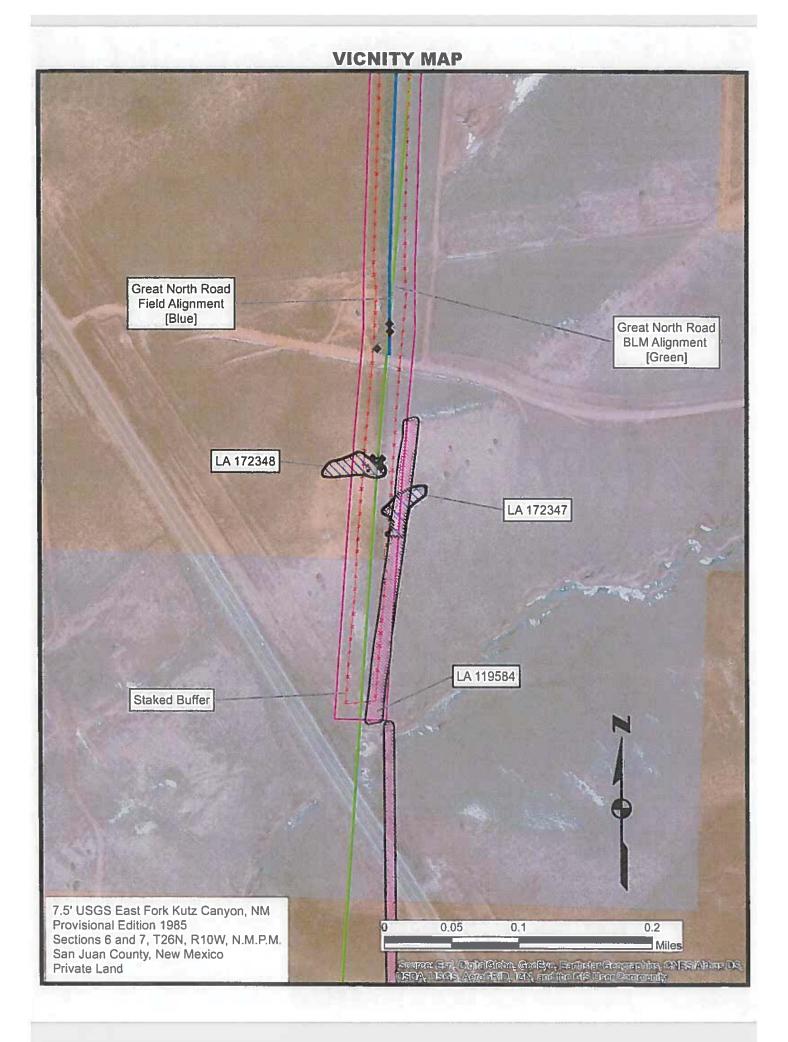
Post Office Box 125 • Bloomfield, New Mexico 87413 • Museum Phone (505) 632-2013 • www.salmonruins.com Museum Fax (505) 632-8633 • DCA Phone (505) 632-2733 or (505) 632-2779 • DCA Fax (505) 632-1707 road's position gives some pause for confusion, it should be noted that other parallel road segments have been identified, such as the parallel roads south of this area near the Carson Divide Site. Consequently, parallel road segments in this area of consideration cannot be ruled out.

As always, I appreciate your concern related to preservation of the Great North Road on your private surface. I might suggest that some additional width be provided as a buffer in the area of possible parallel road segments during your future construction efforts. If you have any additional questions or further assistance, please feel free to contact me.

Sincerely,

Larry **U**Baker Executive Director

Enclosure (1)



Attachment #5

Landfarming

Envirotech will be utilizing a Landfarming technique to treat petroleum contaminated soil that is generated at various oil and gas sites across the Four Corners Region. Landfarming is a bioremediation technique that breaks down the hydrocarbons by microbiological processes and also by oxidation from the sun.

The Landfarm system is laid out in such away that internal berms will control and contain runoff so no water will be able to leave the permitted area. External berms will divert 100% of the runon from the facility and divert it around the facility boundary into already established natural drainages; *see Attachment 11: Run-on and Runoff Control*. Any water that accumulated within the Landfarm remediation cell will be removed within 24 hours to prevent infiltration of contaminates into the vadose zone.

There are three types of berms that will utilized for the proposed facility. The first is a 3' high berm and swale that will carry stormwater run-on around the east and south sides of the facility. The second type of berm is the 3' high perimeter berm that will surround the rest of the facility. The third type of berm is the 2' high internal berms that surround each remediation cell. These berms will contain all runoff and keep it contained within the remediation cell, *see Figure 4F for Berm details*. Each internal berm will have a specific area which was designed to be driven over to access the remediation cell. Design details of the drive over portion of the berm is detailed in *Figure 4G*. This same design will be used for the pipeline crossings that cross the facility.

