

NM1 - 6

# GENERAL CORRESPONDENCE

YEAR(S):  
2006-2003

CRI

CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

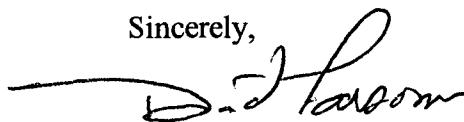
2006 JUN 15 PM 12 20  
June 13, 2006

Wayne Price  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

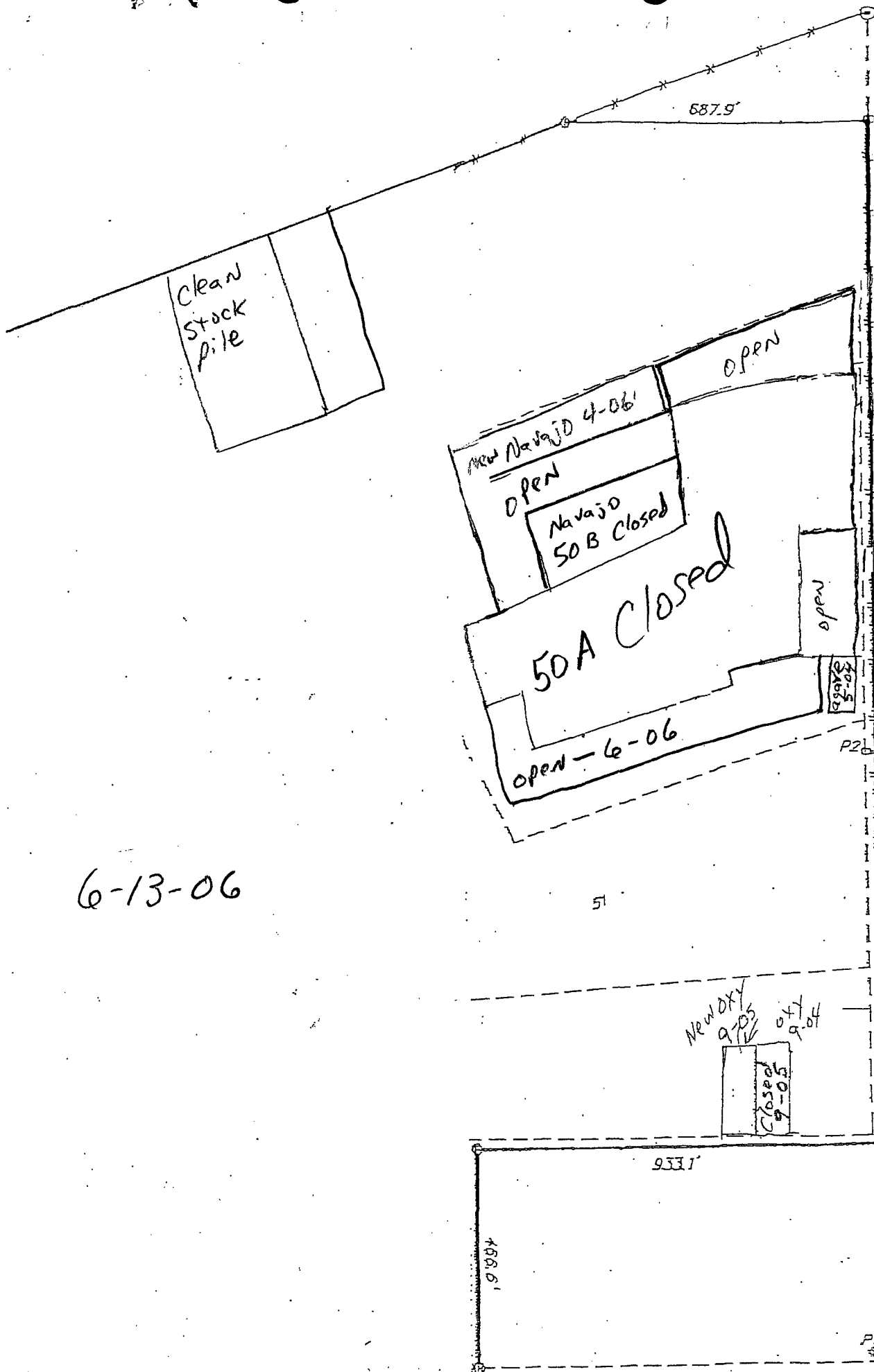
Dear Mr. Price,

CRI is expanding the cell in the solid waste area. Soil from the excavation will be stock piled for future use. Please see attached plot map.

Sincerely,



David Parsons



CU. RD. C-1211

6-13-06

51

20'

P1

CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

June 9, 2006

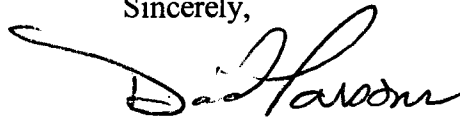
Mr. Wayne Price  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Please find attached our price agreement with the New Mexico General Services Department.

We would appreciate any opportunity to work with you on upcoming projects.

Please call if you have any questions.

Sincerely,



David Parsons

2006 JUN 12 AM 11 42



OCT 1999

001 2-013 3 55' 31"22 N 110° 2



OCT 1999

POD 2-070 6 551 0:22 X X X X.2







State of New Mexico

**ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT**

2040 South Pacheco

P.O. Box 6429

Santa Fe, New Mexico 87505-5472

Received Jun 2000  
From Waste Hauler

OCTOBER 1999

FIRE AT CRI SOLID WASTE  
Pit

4 LIQUID PITS IN SOLID WASTE AREA



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

June 12, 2006

Mr. David Parsons  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241

RE: Your Request for an Elevation Change in the Landfill  
Dated May 10, 2006

Dear Mr. Parsons:

The New Mexico Oil Conservation Division (NMOCD) has received your request shown above. This request, for raising the elevation of the landfill from 3,552' MSL to 3,562' MSL, is approved.

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin  
Environmental Bureau

**CRI**  
**CONTROLLED RECOVERY INC.**

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

May 10, 2006

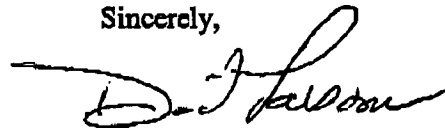
Mr. ED Martin:  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Martin,

Mr. Keith Gordon, P.E. of Gordon Environmental Inc recently conducted a review of our facility. He advised us to seek an elevation change for our landfill to better facilitate future use and long term closure aspects. Please see attached letter.

As per his recommendation we are requesting approval to change fill elevation from 3552' MSL to 3562' MSL. Please call if we can provide additional information.

Sincerely,



David Parsons



(505) 867-4990

**GORDON ENVIRONMENTAL, INC.**

223 S. Camino del Pueblo

(505) 867-4991 Fax

Consulting Engineers

Bernalillo, New Mexico 87004

May 9, 2006

Mr. Ken Marsh  
President  
Controlled Recovery, Inc.  
P. O. Box 388  
Hobbs, NM 88241

Re: Controlled Recovery, Inc. [139.01.01]  
Proposed Elevation Revision

Dear Mr. Marsh:

Gordon Environmental, Inc. (GEI) has reviewed the existing and proposed disposal units at Controlled Recovery, Inc. (CRI). It is our recommendation that the maximum fill elevation be adjusted up by at least 10' (i.e., from elevation 3552' msl to 3562' msl) in order to promote positive drainage to the perimeter. Without this adjustment, the fill surface will be relatively flat across most of the site. This could cause localized ponding and the potential for stormwater infiltration.

Please call with any questions or comments. We appreciate the opportunity of working with you on the CRI project.

Very truly yours,  
Gordon Environmental, Inc.

I. Keith Gordon, P.E.  
Principal

P.O. Box 388  
Hobbs, NM 88241-0388  
Phone: (505) 393-1079  
Fax: (505) 393-3615

Controlled Recovery, Inc.

# Fax

To	Ed Martin	From	David Parsons
Fax	505-476-3462	Date:	05-10-06
Phone		Pages:	2, including cover
Re:			
<input type="checkbox"/> Urgent <input type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle			

**Martin, Ed, EMNRD**

---

**To:** Kim  
**Subject:** RE: Expanding cell

OK.

Ed Martin  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis  
Santa Fe, NM 87505  
Phone: 505-476-3492  
Fax: 505-476-3462  
email: ed.martin@state.nm.us

-----Original Message-----

From: Kim [mailto:kim@carihobbs.com]  
Sent: Monday, March 27, 2006 3:31 PM  
To: Martin, Ed, EMNRD  
Subject: Expanding cell

AR-BC260\_20060327\_151617;



CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

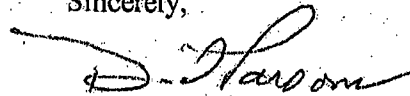
March 24, 2006

Ed Martin  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

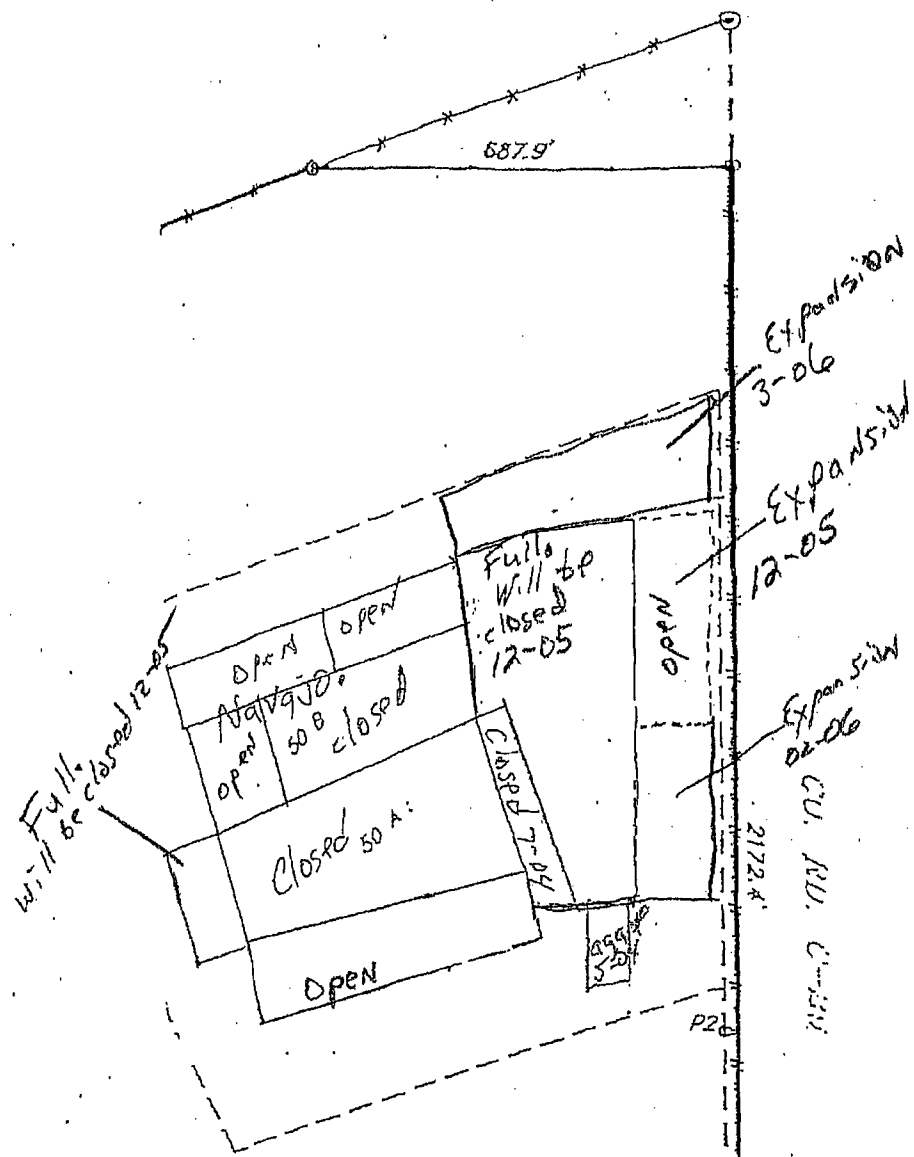
Dear Mr. Martin,

CRI is expanding our cell in the solid waste area. Soil from the excavation will be used to cap and close areas marked as full. Please see attached plot map.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Parsons", with a stylized flourish at the end.

David Parsons



02-09-06

51

**CRI**  
**CONTROLLED RECOVERY INC.**

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

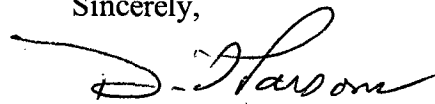
March 24, 2006

Ed Martin  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Martin,

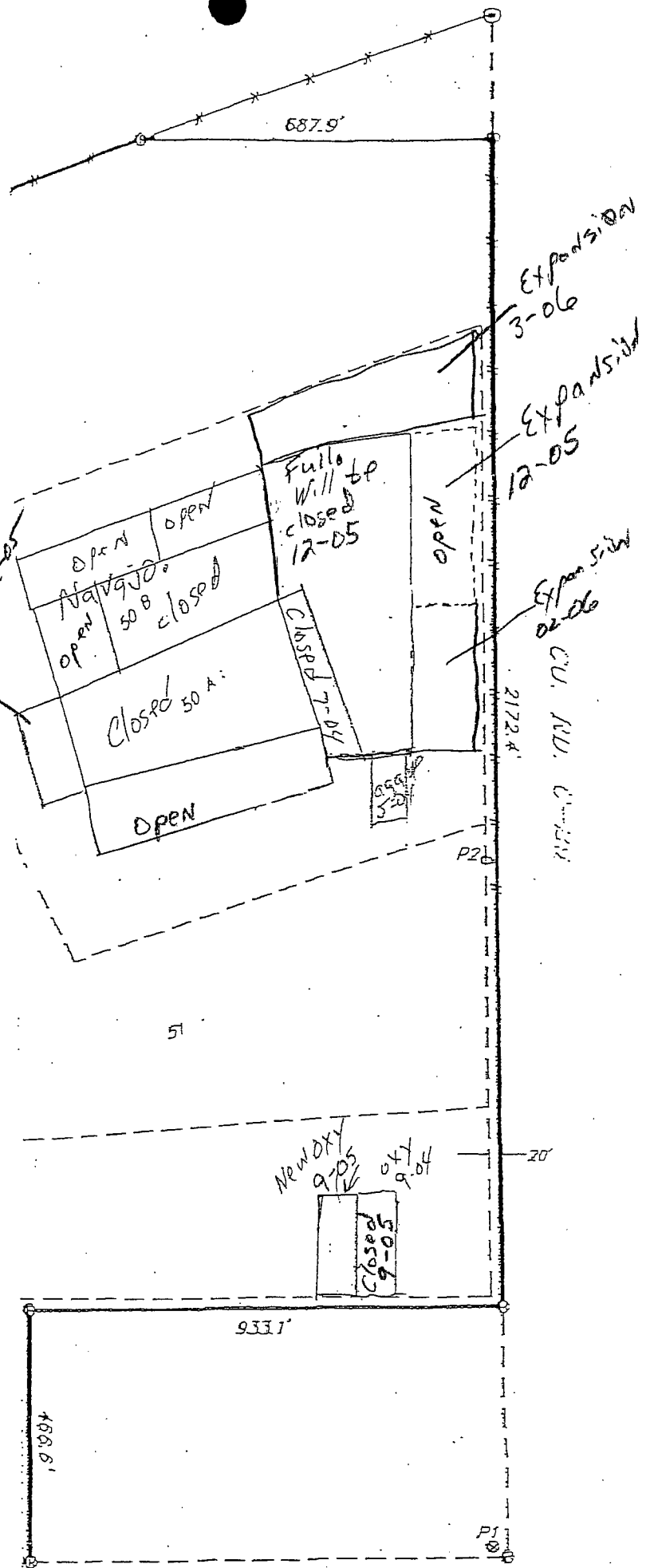
CRI is expanding our cell in the solid waste area. Soil from the excavation will be used to cap and close areas marked as full. Please see attached plot map.

Sincerely,



David Parsons

2006 APR 3 PM 1:11



02-09-06

**Martin, Ed, EMNRD**

---

**To:** kim@carihobbs.com

**Subject:** Request for Expansion

*NM-1-006*

Kim, please pass this on to Dave. Thanks.

The New Mexico Oil Conservation Division has reviewed your request for expansion of the CRI solid waste area, dated February 9, 2006. This request is approved.

*Ed Martin*

New Mexico Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis  
Santa Fe, NM 87505  
Phone: 505-476-3492  
Fax: 505-476-3462  
email: [ed.martin@state.nm.us](mailto:ed.martin@state.nm.us)

2/14/2006

CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

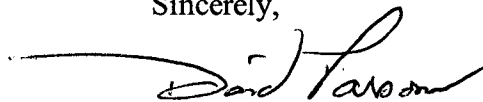
February 9, 2006

Ed Martin  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Martin,

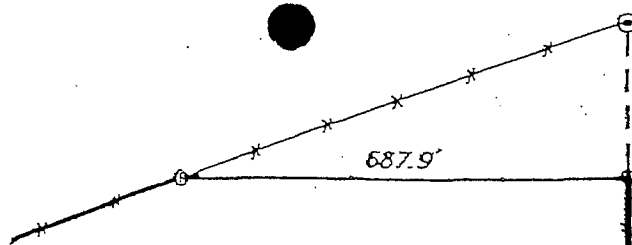
CRI is expanding our cell in the solid waste area. Soil from the excavation will be used to cap and close areas marked as full. Please see attached plot map.

Sincerely,



David Parsons

2006 FEB 13 PM 1



02-09-06



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

January 18, 2006

Mr. David Parsons  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241

RE: Request Dated December 29, 2005  
For Approval To Construct a Settling Area  
At The Surface Waste Management Facility  
Located in the S/2 N/2 and the N/2 S/2 of Section 27,  
Township 20 South, Range 32 East, NMPM,  
Lea County, New Mexico Permit No. NM-01-006

Dear Mr. Parsons:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the request shown above. This request is hereby approved.

NMOCD approval does not relieve Controlled Recovery, Inc. (CRI) from liability should its operations at this site prove to have been harmful to fresh water, human health, or the environment. Nor does it relieve CRI of its responsibility to comply with the rules and regulations of any other governmental entity.

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin  
Environmental Bureau



CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

December 29, 2005

Ed Martin  
State of New Mexico  
Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

2006 JUN 3 PM 3 01

Dear Mr. Martin,

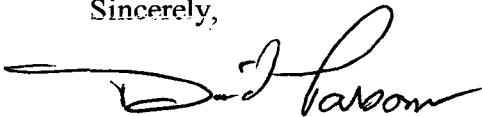
Due to increased volumes of drilling muds and other high solid content liquid waste streams, CRI finds it necessary to address best management practices and procedures to properly and efficiently handle this material.

The logistics between our current settling facility and the solid waste disposal area are becoming inefficient. CRI requests approval to construct a settling area adjacent to the solid waste disposal area. Liquid wastes will be allowed to settle with the clear liquid being transferred to the evaporation area. The solids will be stabilized with soils before being placed in the solid waste disposal area. The location will be adjacent to the active portion of the solid waste disposal area. Please see attached plot map.

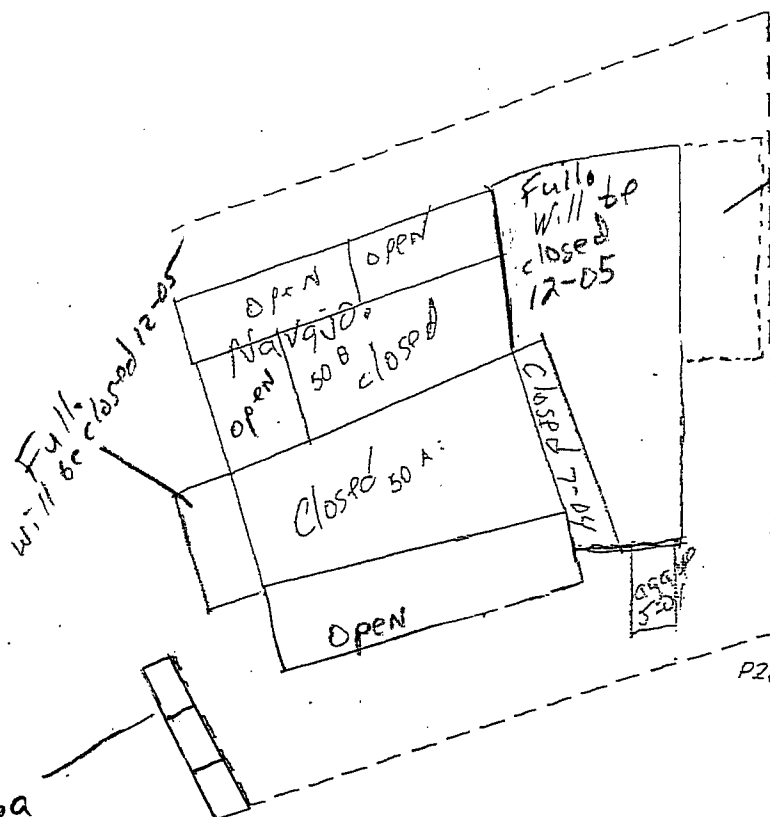
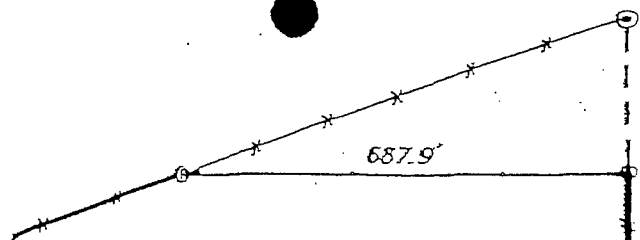
This change will allow efficient handling and will benefit generators and the operator in the proper treatment of these waste streams.

Thank you for your consideration.

Sincerely,



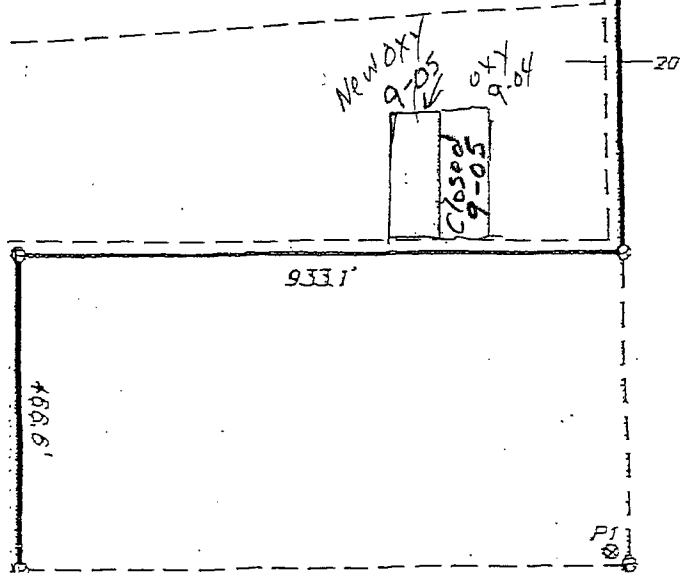
David Parsons



Expansion  
12-05

C.U. N.D. C-12-11

proposed  
settling area  
1-06



**CRI**  
**CONTROLLED RECOVERY INC.**

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

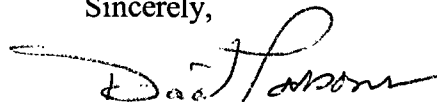
December 1, 2005

Ed Martin  
NMOCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Martin,

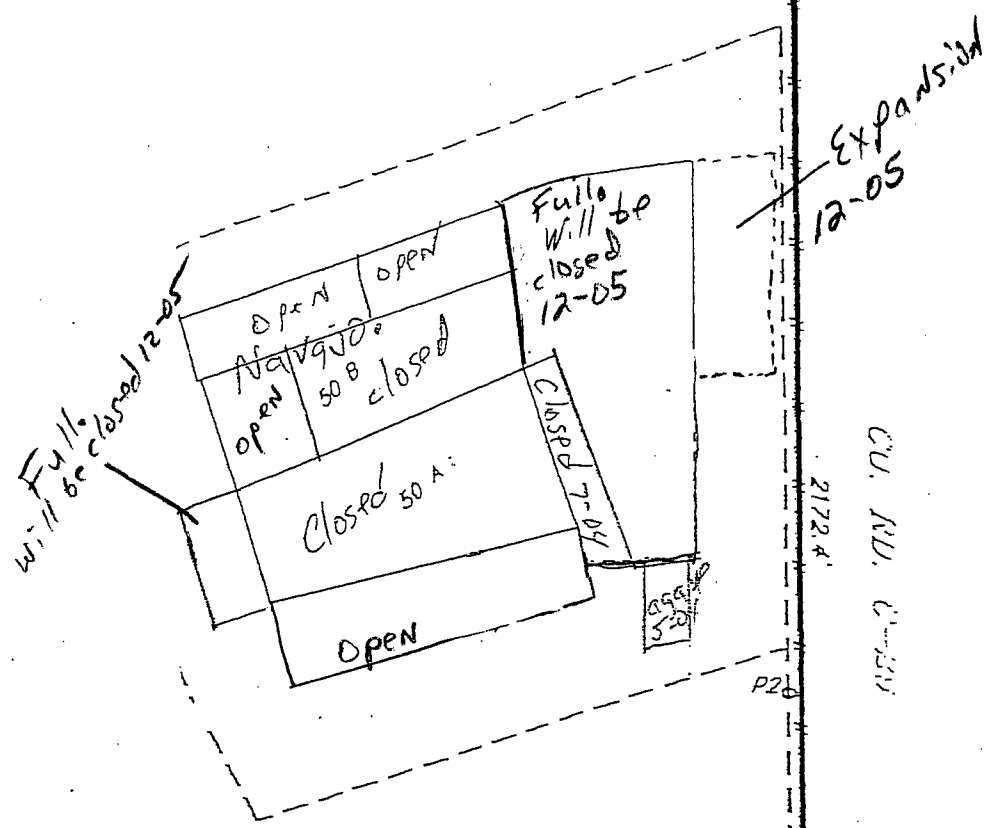
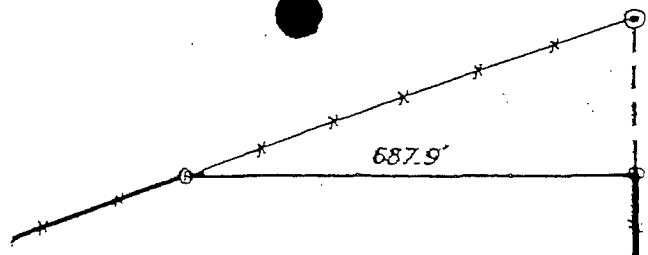
CRI is expanding our cell in the solid waste area. Soil from the excavation will be used to cap and close areas marked as full. Please see attached plot map.

Sincerely,



David Parsons

**RECEIVED**  
DEC 1 - 2005  
OIL CONSERVATION  
DIVISION



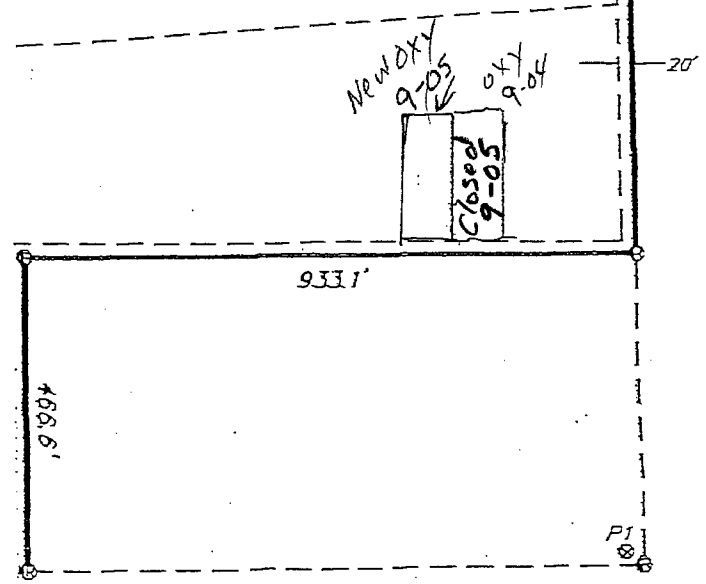
Expansion  
12-05

CU. NU. C-330

2172.4'

P2

51



New oxy  
9-05  
oxy  
9-04

Closed  
9-05

20'

933.1'

488.6'

P1

CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

RECEIVED

November 4, 2005

NOV 14 2005

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

OIL CONSERVATION  
DIVISION

NM-1-006

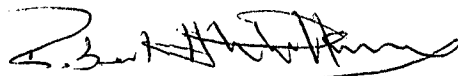
RE: Wash Facility at Halfway Facility R9166 Lea County, New Mexico

Dear Mr. Martin;

Enclosed find a copy of the test results from the waste water from the above reference wash facility.

If you have any question, do not hesitate to call.

Respectfully,



Robert H. Whittemore

Enclosures



# ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 383-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
CONTROLLED RECOVERY, INC.  
ATTN: R. WHITEMORE  
P.O. BOX 369  
HOBBS, NM 88241  
FAX TO:

Receiving Date: 10/21/05  
Reporting Date: 10/26/05  
Project Number: NOT GIVEN  
Project Name: TRUCK WASH SAMPLE  
Project Location: HALFWAY, NM  
Lab Number: H10329-1  
Sample ID: WATER SAMPLE

Analysis Date: 10/24/05  
Sampling Date: 10/21/05  
Sample Type: WASTEWATER  
Sample Condition: COOL & INTACT  
Sample Received By: NF  
Analyzed By: BC

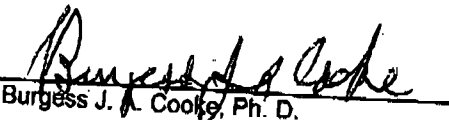
TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H10329-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.089	89	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.100	100	0.100
Methyl Ethyl Ketone	200	<0.005	<0.005	0.112	112	0.100
Chloroform	6.0	<0.005	<0.005	0.084	84	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.080	80	0.100
Benzene	0.5	<0.005	<0.005	0.090	90	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.084	84	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.090	90	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.106	106	0.100
Chlorobenzene	100	<0.005	<0.005	0.100	100	0.100
1,4-Dichlorobenzene*	7.5	0.008	0.006	0.100	100	0.100

\*Analyte detected at similar levels in sample & method blank.

## % RECOVERY

Dibromofluoromethane	104
Toluene-d8	113
Bromofluorobenzene	113

METHODS: EPA SW 846-8260, 1311

  
Burgess J. Cooke, Ph. D.

10/26/05  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



# ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
CONTROLLED RECOVERY, INC.  
ATTN: R. WHITTEMORE  
P.O. BOX 369  
HOBBS, NM 88241  
FAX TO:

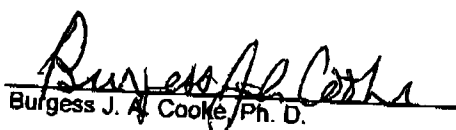
Receiving Date: 10/21/05  
Reporting Date: 10/26/05  
Project Number: NOT GIVEN  
Project Name: TRUCK WASH SAMPLE  
Project Location: HALFWAY, NM  
Lab Number: H10329-1  
Sample ID: WATER SAMPLE

Analysis Date: 10/24/05  
Sampling Date: 10/21/05  
Sample Type: WASTEWATER  
Sample Condition: COOL & INTACT  
Sample Received By: NF  
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H10329	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.050	<0.005	0.006	12	0.050
1,4-Dichlorobenzene	7.50	<0.050	<0.005	0.030	60	0.050
o-Cresol	200	<0.050	<0.005	0.024	48	0.050
m, p-Cresol	200	<0.050	<0.005	0.023	46	0.050
Hexachloroethane	3.00	<0.050	<0.005	0.020	40	0.050
Nitrobenzene	2.00	<0.050	<0.005	0.032	64	0.050
Hexachloro-1,3-butadiene	0.500	<0.050	<0.005	0.029	58	0.050
2,4,6-Trichlorophenol	2.00	<0.050	<0.005	0.038	76	0.050
2,4,5-Trichlorophenol	400	<0.050	<0.005	0.041	82	0.050
2,4-Dinitrotoluene	0.130	<0.050	<0.005	0.041	82	0.050
Hexachlorobenzene	0.130	<0.050	<0.005	0.047	94	0.050
Pentachlorophenol	100	<0.050	<0.005	0.042	84	0.050

% RECOVERY	
Fluorophenol	44
Phenol-d5	30
Nitrobenzene-d5	70
2-Fluorobiphenyl	76
2,4,6-Tribromophenol	109
Terphenyl-d14	93

METHODS: EPA SW-846 1311, 8270, 3510

  
Burgess J. A. Cooke / Ph. D.

10/26/05  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



# ARDINAL LABORATORIES

PHONE (325) 873-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

## ANALYTICAL RESULTS FOR CONTROLLED RECOVERY, INC.

ATTN: R. WHITEMORE

P.O. BOX 369

HOBBS, NM 88241

FAX TO:

Receiving Date: 10/21/05

Reporting Date: 10/28/05

Project Number: NOT GIVEN

Project Name: TRUCK WASH SAMPLE

Project Location: HALFWAY, NM

Sampling Date: 10/21/05

Sample Type: WASTEWATER

Sample Condition: COOL & INTACT

Sample Received By: NF

Analyzed By: HM/BC

LAB NO. SAMPLE ID	REACTIVITY			
	Sulfide (ppm)	Cyanide (ppm)	CORROSIVITY (pH)	IGNITABILITY (°F)
ANALYSIS DATE:	10/26/05	10/26/05	10/25/05	10/28/05
H10329-1 WATER SAMPLE	Not reactive	Not reactive	6.85	>140
Quality Control	NR	NR	6.64	NR
True Value QC	NR	NR	7.00	NR
% Recovery	NR	NR	94.9	NR
Relative Percent Difference	NR	NR	0.1	NR

METHOD: EPA SW-846 7.3, 7.2, 1010, 1311, 40 CFR 261

*Bryan J. Ashe*  
Chemist

10/28/05  
Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims for damages, including consequential damages, shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.





# ARDINAL LABORATORIES

PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (605) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

## ANALYTICAL RESULTS FOR CONTROLLED RECOVERY, INC.

ATTN: R. WHITEMORE

P.O. BOX 369

HOBBS, NM 88241

FAX TO:

Receiving Date: 10/21/05

Reporting Date: 11/01/05

Project Number: NOT GIVEN

Project Name: TRUCK WASH SAMPLE

Project Location: HALFWAY, NM

Sampling Date: 10/21/05

Sample Type: WASTEWATER

Sample Condition: COOL & INTACT

Sample Received By: NF

Analyzed By: HM

### TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
---------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------	-----------

ANALYSIS DATE:	10/28/05	10/31/05	11/01/05	10/31/05	10/31/05	10/31/05	11/01/05	10/28/05
EPA LIMITS:	5	5	100	1	5	5	0.2	1
H10329-1 WATER SAMPLE	<1	<1	<5	<0.1	<1	<2	<0.02	<0.1
Quality Control	0.045	1.077	74.79	1.001	4.812	4.970	0.0096	0.053
True Value QC	0.050	1.000	75.00	1.000	5.000	5.000	0.0100	0.050
% Recovery	90.0	108	99.7	100	96.2	99.4	96.0	106
Relative Standard Deviation	5.3	0.5	6.5	0.1	0.5	2.1	4.9	2.3

METHODS: EPA 1311, 600/4-91,	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2
------------------------------	-------	-------	-------	-------	-------	-------	-------	-------

Amy Hill  
Chemist

11/1/05  
Date

H10329

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

November 1, 2005

Mr. David Parsons  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241

Dear Mr. Parsons:

Controlled Recovery, Inc.'s request, dated October 12, 2005, to expand the settling ponds as shown on the attachment to that request is hereby approved.

The New Mexico Oil Conservation Division's approval of this request does not relieve Controlled Recovery, Inc. (CRI) of liability should its operations prove harmful to the public health or the environment. Nor does it relieve CRI of its responsibility to comply with the rules and regulations of any other local, county, state or federal governmental entity.

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin  
Environmental Bureau

**CRI**  
**CONTROLLED RECOVERY INC.**

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

**RECEIVED**

OCT 17 2005

**OIL CONSERVATION  
DIVISION**

October 12, 2005

Mr. Ed Martin  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Martin,

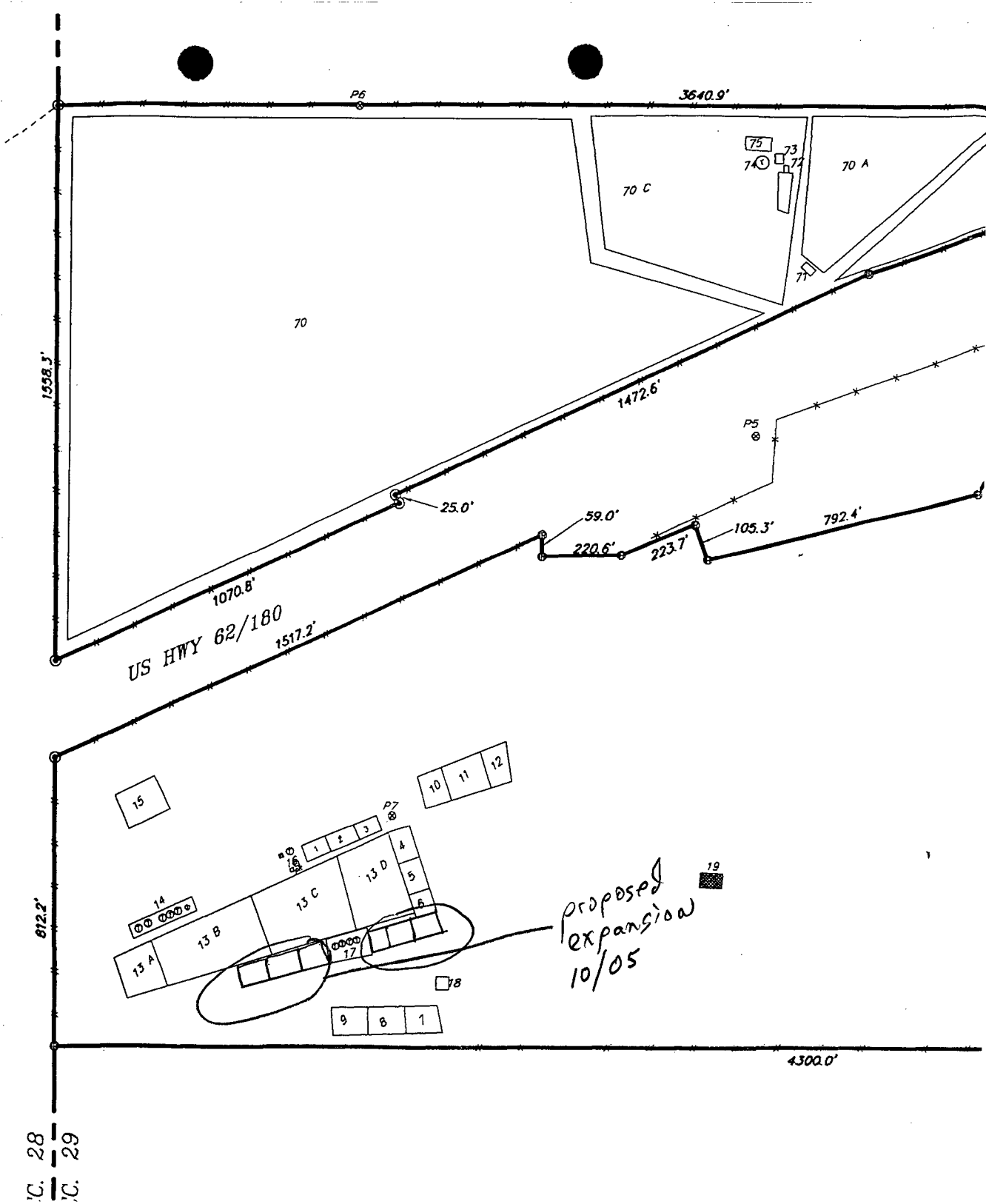
CRI requests approval to expand the settling ponds to allow additional retention time for liquids being brought into our facility.

Please see attached plot map.

Thank you,



David Parsons



CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

August 1, 2005

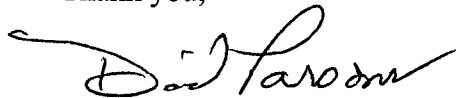
Mr. Ed Martin  
State of New Mexico  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Mr. Martin:

Please find attached photos of wash water catch tank installation for the newly constructed truck wash bay.

Please call me if you have any questions.

Thank you,



David Parsons

*NM-1-006*

*NM-1-006*

# MEMORANDUM

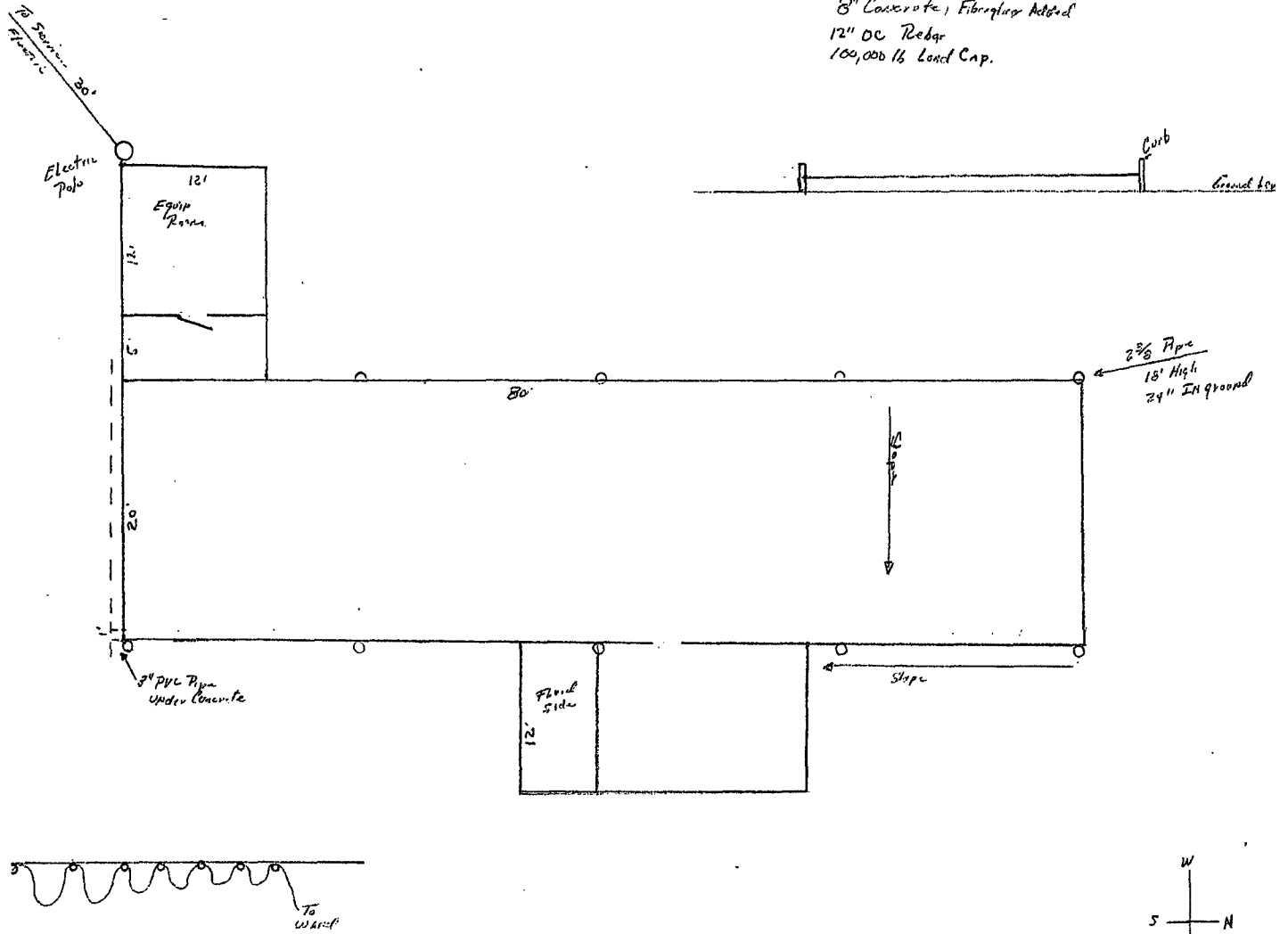
**To:** Ken Marsh  
**From:** Robert Whittemore  
**Date:** August 01, 2005

**Subject:** Truck Wash Materials

Attached is the information and photos you requested on the above subject matter.

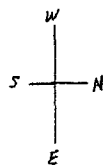
Robert

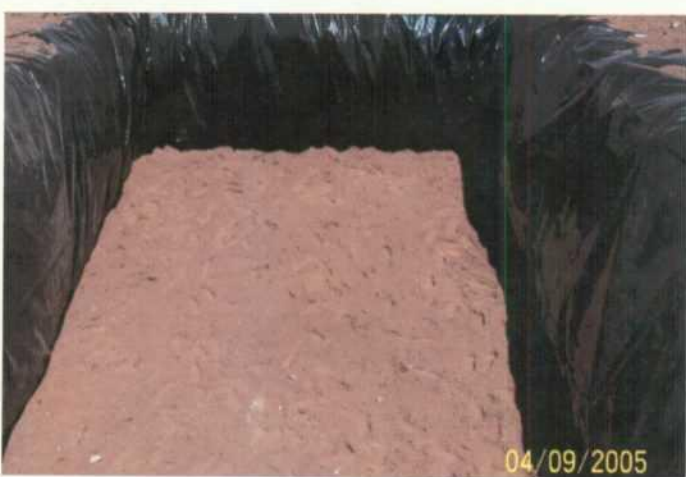
8" Concrete, Fibreglass Added  
 12" OC Rebar  
 100,000 lb Load Cap.



Revision: N<sup>o</sup> 4

Revision Date: 04/07/05









District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

RECEIVED  
AUG 29 2005  
State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

NM-1-0006

## Release Notification and Corrective Action

### OPERATOR

X Initial Report ☐ Final Report

Name of Company Controlled Recovery, Inc.	Contact David Parsons
Address P.O. Box 388, Hobbs, NM 88241	Telephone No. 505-393-1079
Facility Name Controlled Recovery, Inc.	Facility Type Surface Waste Management

Surface Owner Controlled Recovery, Inc.	Mineral Owner	Lease No.
---	---------------	-----------

### LOCATION OF RELEASE

Unit Letter	Section 27	Township 20S	Range 32E	Feet from the	North/South Line	Feet from the	East/West Line	County Lea
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Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

### NATURE OF RELEASE

Type of Release BS & W & Water	Volume of Release 100BBLS	Volume Recovered 50BBLS
Source of Release Pit 12	Date and Hour of Occurrence 08/20/05 10:00P.M.	Date and Hour of Discovery 08-26-05 12:30P.M.
Was Immediate Notice Given? X Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Paul Scheely-Hobbs OCD Office-08-26-05, 1:20P.M. Roger Anderson, 08-26-05, 3:05P.M., Ed Martin 08-26-05, 3:08P.M.	
By Whom? David Parsons	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes X No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

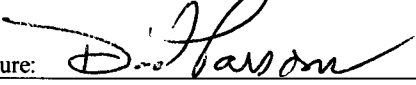
Describe Cause of Problem and Remedial Action Taken.\*

Pit too full to hold heavy rains.

Describe Area Affected and Cleanup Action Taken.\*

Spilled over backside and filled bermed area. Heavy rain broke through secondary dike allowing BS & W to flow North approximately 100 feet and East 100 feet. Used Vacuum truck to pickup free fluid. Hauled Caliche to absorb BS & W. Will use backhoe to pick up soaked caliche and remove to landfill.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: David Parsons	Approved by District Supervisor:	
Title: Vice-President	Approval Date:	Expiration Date:
E-mail Address: david@carihobbs.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 08-26-05	Phone: 505-393-1079	

\* Attach Additional Sheets If Necessary

**DOMENICI LAW FIRM, P.C.**

ATTORNEYS AT LAW

6100 Seagull Street NE, Suite 205  
Albuquerque, New Mexico 87109Pete V. Domenici, Jr.  
pdomenici@domenicilaw.comCharles N. Lakins  
clakins@domenicilaw.comJeanne Cameron Washburn  
jwashburn@domenicilaw.com(505) 883-6250 Telephone  
(505) 884-3424 FacsimileLorraine Hollingsworth  
lhollingsworth@domenicilaw.com

April 21, 2005

VIA FACSIMILE to: (505) 476-3462 and U.S. Mail

New Mexico Oil Conservation Division  
ATTN: Lawrence Romero  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

NM-1-006

Re: Inspection of Public Records Request

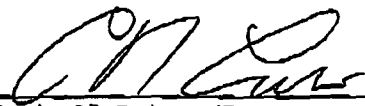
Dear Mr. Romero:

This letter is an Inspection of Public Records Request under 14-2-1 through 14-2-12 NMSA.

We are requesting a complete copy of the entire OCD file for the Controlled Recovery, Incorporated solid waste landfill located between Hobbs and Carlsbad. We have a need to accomplish this on an expedited basis and will arrange for a commercial copy company to make the copies.

I ask that you please inform me if the OCD will allow for the file to be removed for copying or if a copy service needs to bring a copy machine to OCD to make copies on site.

Thank you for your courtesies.

Sincerely,  
DOMENICI LAW FIRM, P.C.  
Charles N. Lakins, Esq.

cc: 1548



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

April 5, 2005

Mr. David Parsons  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241

Dear Mr. Parsons:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed your plan, dated March 31, 2005, to construct a wash pad and an equipment building at the Controlled Recovery, Inc. (CRI) surface waste management facility located in Lea County.

This plan is hereby approved.

NMOCD approval does not relieve CRI should its operations at the site prove harmful to human health or the environment. Nor does it relieve CRI of its responsibility to comply with the rules and regulations of any other state, county, or local governmental agency.

If you have any questions, contact me at (505) 476-3492 or [emartin@state.nm.us](mailto:emartin@state.nm.us)

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Edwin E. Martin  
Environmental Bureau

Cc: NMOCD, Hobbs

CRI  
CONTROLLED RECOVERY INC.

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

March 31, 2005

Mr. Ed Martin  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

RE: Halfway facility R9166 Lea County, NM

Dear Mr. Martin,

CRI, request approval to construct a wash pad to wash roll off bins, trucks, trailers, and equipment at our facility.

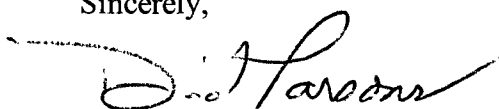
The pad will be 80'X 20' X 8" depth of reinforced concrete with a slope to one side and drain canal to an underground tank with baffle system. The tank will have grate covering the top for safety and visual inspection, a leak detection system will be installed. An equipment building approximately 12' X 12' will be constructed on the side of the pad.

CRI proposes to test the wash water for compliance with OCD practices after 6 months operations. Additional testing will occur if the process or usage is changed.

Enclosed please find drawing of pad and location on site map.

Please call if I may provide additional information.

Sincerely,

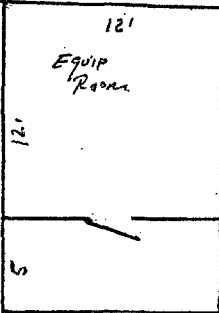


David Parsons

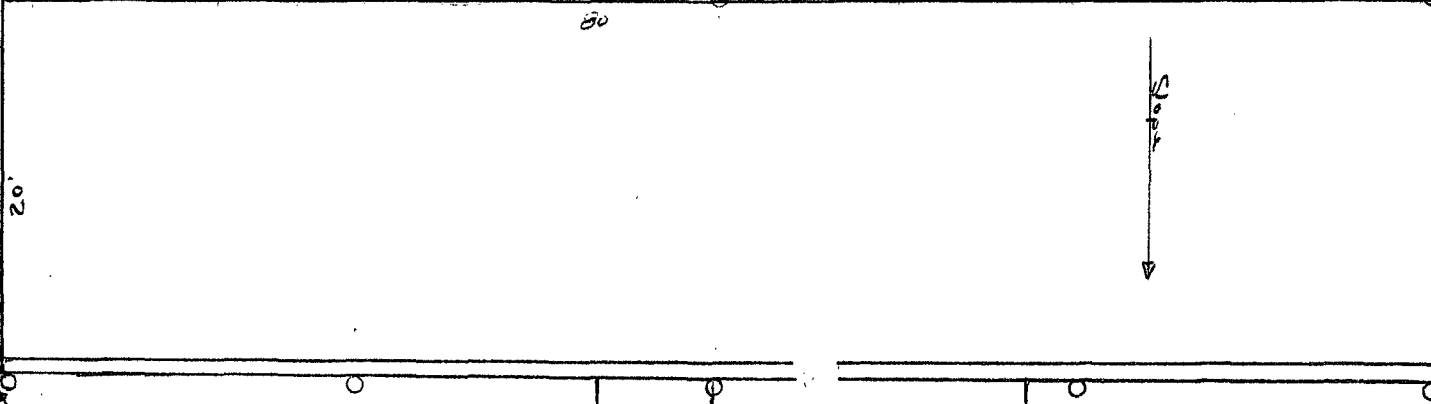
To Service 30'

8" Concrete, Fiberglass Added  
12" OC Rebar  
100,000 lb Load Cap.

Electric  
Pole

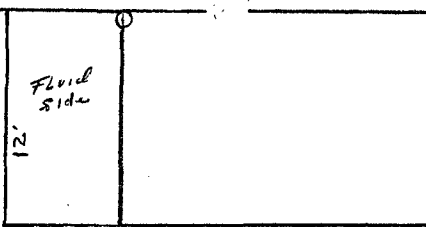


2 3/8" Pipe  
18' High  
24" IN ground



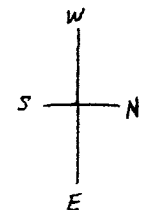
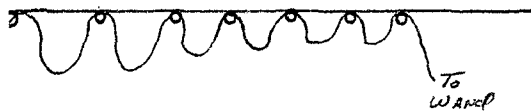
Door

Slope



for  
1" Width  
2" Deep

3" PVC Pipe  
under concrete





**CRI**  
**CONTROLLED RECOVERY INC.**

P.O. BOX 388, HOBBS, NM 88241  
(505) 393-1079 • FAX (505) 393-3615

**RECEIVED**

MAR 23 2005

**OIL CONSERVATION  
DIVISION**

March 18, 2005

Mr. Ed Martin  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

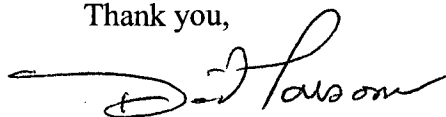
*NM-1-006*

Mr. Martin,

Thank you for your recent visit to our facility. The empty drums noted in your report have been removed, cleaned, and will be recycled. Please find attached pictures of the landfill area where the drums were located.

If I may be of any assistance, please call me @ 505-393-1079 or email me @ [david@carihobbs.com](mailto:david@carihobbs.com).

Thank you,



David Parsons











# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

March 9, 2005

Mr. Ken Marsh  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241-0388

COPY

Re: Controlled Recovery, Inc. Permit NM-1-006

Dear Mr. Marsh:

The surface waste management facility covered by the above permit was inspected by the New Mexico Oil Conservation Division on February 10, 2005, and found the site to be in generally good shape. There were some empty drums sitting around in the yard that needed to go to the landfill. Other than that, no permit deficiencies were noted.

If you have any questions, contact me at (505) 476-3492 or [emartin@state.nm.us](mailto:emartin@state.nm.us)

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in cursive script that reads "Ed Martin".

Edwin E. Martin  
Environmental Engineer

cc: NMOCD, Hobbs







# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

7001 1940 0004 7920 7645

March 4, 2005

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

Mr. Ken Marsh  
Controlled Recovery, Inc.  
P.O. Box 388  
Hobbs, NM 88241-0388

Permit Number: NM-1-006

Re: Administrative Modification of Landfarm Permits

The Oil Conservation Division (OCD) issued the landfarm permit identified above under OCD Rule 711. As explained in the public notice given prior to the issuance of the permit, the permit was for landfarming to remediate hydrocarbon-contaminated soils. The language of the permit, however, is broader, allowing the facility to accept oilfield contaminated solids which are either exempt from the Federal RCRA Subtitle C (hazardous waste) regulations or are "nonhazardous" by characteristic testing. If this language were interpreted to allow the landfarm to accept oilfield waste contaminated with salts, the salts could compromise the biodegradation capacity of the landfarm. And because salts leach more easily than hydrocarbons, the landfarm may pose a greater threat to groundwater.

According to the terms of the permit identified above, the OCD may change the permit conditions administratively for good cause shown as necessary to protect fresh water, human health and the environment. The OCD has determined that it is necessary to protect fresh water, human health and the environment to modify the permit as follows:

**Effective immediately, the NMOCD permitted landfarm identified above is prohibited from accepting oilfield waste contaminated with salts.**

If the landfarm identified above wishes to accept oilfield waste contaminated with salts, you will need to file an application to modify the permit pursuant to OCD Rule 711.B(1) and follow the notice requirements of OCD Rule 711.B(2). If you have already filed a complete application for permit modification with this office and complied with the notice requirements, the OCD will process the application promptly.

Landfarms that wish to accept oilfield wastes contaminated with salts while their application for permit modification is pending may apply to the Division Director for an emergency order under OCD Rule 1202. Applications for emergency orders will be considered on a case-by-case basis.

This notice is being sent to all entities operating landfarm facilities in New Mexico permitted pursuant to OCD Rule 711, as shown on the attached list.

If you have any questions, please contact Ed Martin at (505) 476-3492 or [emartin@state.nm.us](mailto:emartin@state.nm.us).

Very truly yours,

Mark E. Fesmire, P.E

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
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

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report

☒ Final Report

Name of Company	Controlled Recovery Inc.	Contact	David Parsons
Address	PO Box 388	Telephone No.	505-393-1079
Facility Name	Controlled Recovery Inc.	Facility Type	

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
8 mi South of Hwy 128 on C-1 - Lea County NM.								

NATURE OF RELEASE

Type of Release	RCRA exempt drill cuttings	Volume of Release	75 BBL	Volume Recovered	75 BBL
Source of Release	accident	Date and Hour of Occurrence	Date and Hour of Discovery		
Was Immediate Notice Given?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	Dec 26 - 3:00 AM.		
By Whom?	Larry Parker	Date and Hour	Dec 27 - 9:30 A.M.		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* driver inattention caused load to shift and dump cuttings on road.

Describe Area Affected and Cleanup Action Taken.\* Bar ditch on side of road. Scrapped up with backhoe & hauled to CRT. Clean top soil taken back. Please see attached photos

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: <i>David Parsons</i>	OIL CONSERVATION DIVISION		
Printed Name: <i>David Parsons</i>	Approved by District Supervisor:		
Title: <i>V.P.</i>	Approval Date:	Expiration Date:	
E-mail Address: <i>david@critobbs.com</i>	Conditions of Approval:		Attached <input type="checkbox"/>
Date: <i>12-27-06</i>	Phone:		

\* Attach Additional Sheets If Necessary

emailed to wayne & daniel 4:15 p.m. 12-27-06

e-mail → daniel.sanchez@state-nm.us





12/29/2006





12/29/2006





12/29/2006



12/29/2006