

**NM1 -**

**7**

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**PERMITS,  
RENEWALS, &  
MODS**



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

May 9, 2001

Lori Wrotenbery  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 7099-3220-0000-5051-2313**

Mr. Morris Young  
Envirotech Inc.  
5796 U. S. Highway 64-3014  
Farmington, New Mexico 87401

**RE: CLOSURE OF LANDFARM #1 and CANCELLATION OF PERMIT NM-01-0007  
NE ¼ SE ¼ of Section 26, Twn. 26 North, Rng. 11 West, NMPM,  
San Juan County, New Mexico**

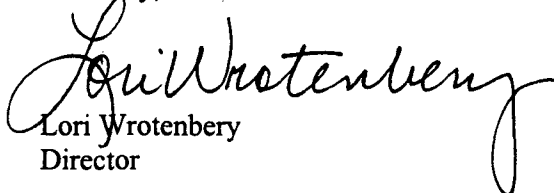
Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) is in receipt of Envirotech Inc.'s (Envirotech) closure report dated March 12, 2001 for Landfarm # 1 at the above-referenced location. Based on the closure report, the May 15, 2000 OCD inspection, Envirotech's March 10, 2000 letter, and discontinued maintenance status approval letters dated April 23, 1997, April 17, 1998, November 18, 1999 and April 3, 2000, we have determined that the cells within Landfarm #1 have been remediated to OCD standards and the site has been restored to prevent erosion. **The OCD hereby approves of the closure of Landfarm #1 and cancels Permit NM-01-0007.**

Please be advised that OCD approval does not relieve Envirotech of liability should any remaining contaminants result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve Envirotech of the responsibility for compliance with other federal, state, or local laws and/or regulations.

If you have any questions please contact Martyne J. Kieling at 505-476-3488.

Sincerely,

  
Lori Wrotenbery  
Director

LW/mjk

xc: OCD Aztec Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

May 8, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 7000-3220-0000-5051-2320**

Mr. Morris Young  
Envirotech, Inc.  
5796 US Highway 64-3014  
Farmingtonm, NM 87401

**RE: \$25,000 Bond for Commercial Waste Management Facility Permit # NM-01-0007**  
**Envirotech, Inc., Principal**  
**Sections 25 and 26, T 26 N, R 11 W, NMPM, San Juan County, New Mexico**  
**International Fidelity Insurance Co., Surety**  
**Bond No. 868997**

Dear Mr. Young:

The OCD has granted final closure status to Envirotech Landfarm #1 for the 711 Waste Management Facility (Permit NM-01-0007) and hereby approves the cancellation of the above-referenced financial assurance and releases International Fidelity Insurance Co. of any liability.

Sincerely,

Stephen C. Ross  
Assistant General Counsel, EMNRD

SCR:mjk

Enclosure: Original Surety Bond 868997

xc with attachment:

Aztec OCD Office  
Roy Owen, International Fidelity Insurance Co., 1 Newark Center 20<sup>th</sup> floor, Newark, NJ 07102



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

May 10, 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-241-984**

Mr. Morris D. Young  
Envirotech, Inc.  
5796 U.S. Highway 64 - 3014  
Farmington, New Mexico 87401

**RE: APPROVAL TO OPEN ENVIROTECH LANDFARM NO. 1  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Young:

Envirotech, Inc. was directed by the New Mexico Oil Conservation Division (OCD) on March 5, 1993 to close both Landfarm No. 1 and Landfarm No. 2 because of suspected violations of OCD Rule 711. Approval was granted by the OCD on March 12, 1993, to reopen Landfarm No. 2 pursuant to the conditions listed in the approval.

The OCD hereby grants Envirotech Inc. approval to open Landfarm No. 1 located in the NE/4 SE/4, Section 26, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico, pursuant to the following conditions:

1. There will be no entry of any persons or removal of any materials from the holding areas located adjacent to Landfarm No. 1 without approval from both the OCD Aztec Office and the New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau.
2. Exempt contaminated soils will be placed in the landfarm so that they are physically separate (ie. bermed) from nonexempt contaminated soils. There will be no mixing of exempt and nonexempt soils.

Mr. Morris D. Young  
May 10, 1993  
Page 2

3. All loads received at the landfarm will be accompanied by one of the following:
  - a. A "Certification of Waste Status" signed by a corporate official of the waste generator or the New Mexico Environment Department (NMED) for wastes regulated by that agency, certifying the exempt classification of the soils proposed for disposal at the facility.
  - b. The analytical results of Hazardous Waste Characterization including corrosivity, reactivity, ignitability, and toxic constituents and a certification that no listed hazardous wastes are contained within the wastes. The samples for these analyses and results will be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures.
4. The transporter of all wastes to the facility will supply a certification that the wastes delivered are those wastes received from the generator and that no additional materials have been added.
5. Envirotech is authorized to accept only:
  - a. Petroleum contaminated soils which are exempt from RCRA Subtitle C regulations and are generated from oil and gas exploration and production operations.
  - b. Other RCRA exempt contaminated soils on a case-by-case basis only after OCD approval. These wastes must be accompanied by a "Certification of Waste Status" certifying the exempt classification of the soils signed by the appropriate state or federal regulatory agency.
  - c. "Non-hazardous" non-exempt contaminated soils from **OCD permitted facilities** on a case-by-case basis after conducting an analysis for hazardous characteristics and receiving OCD approval. The test for hazardous characteristics for a particular waste may be effective for one year from the date of analysis, if, the subsequent wastes from the same waste stream are accompanied by a statement from a corporate official that there has been no change in the processes employed or the chemicals stored/used at the facility generating the waste.
  - d. "Non-hazardous" non-exempt contaminated soils if there is an emergency request and the wastes are accompanied by a "Certification of Waste Status" certifying the nonhazardous classification of the soils signed by the appropriate state or federal regulatory agency. OCD approval must be obtained prior to accepting the wastes.

Mr. Morris D. Young  
May 10, 1993  
Page 3

6. At no time will the Envirotech Facility accept wastes which are hazardous by either testing or listing.

Please note that the OCD is in the process of developing a comprehensive transportation and disposal manifest that will accompany each load received at the landfarm. Until that form is finalized Envirotech may use their own personal forms.

The hazardous waste located in the holding area adjacent to Landfarm No. 1 will be removed in accordance with the procedures and time schedule of the NMED Hazardous Waste and Radioactive Materials Bureau. After the hazardous waste is removed, Envirotech Inc. will either cease using the holding and stabilization areas located adjacent to Landfarm No. 1 or submit a request to include them into the OCD Rule 711 permit. Please note that no OCD regulated wastes will be stored outside of the permitted disposal facility.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5812.

Sincerely,

*William J. LeMay*  
*WJL*

William J. LeMay  
Director

WJL/kmb

xc: Frank Chavez, OCD Aztec Office  
Ed Horst, NMED Hazardous Waste & Radioactive Materials Bureau



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



MEMORANDUM

BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

TO: ALL COMMERCIAL SURFACE DISPOSAL FACILITIES

FROM: WILLIAM J. LEMAY, Director *WJL*  
Oil Conservation Division

SUBJECT: DOCUMENTATION REQUIRED FOR ACCEPTANCE OF WASTE

DATE: APRIL 2, 1993

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The Oil Conservation Division (OCD) has issued a number of Rule 711 permits for commercial surface disposal facilities which allow the facilities to accept certain types of wastes. The OCD has not previously listed the documentation that should accompany all waste accepted at these facilities. Attached is a list of the documentation to accompany any waste accepted by an OCD-permitted commercial disposal facility. Listed are the certifications and tests required for the various classifications of waste. Also attached is a list of the oil and gas wastes exempted from EPA "hazardous waste" classification.

This documentation provides protection from hazardous waste regulations for the waste generator, transporter and disposal facility and facilitates OCD oversight. Please note that certain types of non-oilfield wastes can also be accepted by a disposal facility under its OCD Rule 711 permit. The OCD is currently in the process of developing an information form to accompany each load of waste received at a disposal facility. Until that form is finalized, each facility may develop and use its own forms and shall retain these records at the facility.

If you have any questions regarding the technical aspects of the documentation needed, please call **Roger Anderson** at **505/827-5812**.

**DOCUMENTATION REQUIRED TO ACCEPT WASTES  
COMMERCIAL SURFACE DISPOSAL FACILITIES**

(April 1, 1993)

1. Exempt Oilfield Waste: A "Certification of Waste Status" signed by a corporate official of the waste generator certifying that the wastes are generated from oil and gas exploration and production operations and are exempt from Resource Conservation and Recovery Act (RCRA) Subtitle C regulations.
  
2. Exempt, Non-Oilfield Waste: A "Certification of Waste Status" signed by the New Mexico Environment Department (NMED) or the appropriate regulatory agency for non-oilfield wastes which are exempt from RCRA Subtitle C regulations. Acceptance is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district office.
  
3. Non-exempt, Non-hazardous Waste from OCD Permitted Facilities: The analytical results of \*Hazardous Waste Characterization. The test for hazardous characteristics for a particular waste may be effective for one year from the date of analysis, if, the subsequent wastes from the same waste stream are accompanied by a statement from a corporate official that there has been no change in the processes employed or the chemicals stored/used at the facility generating the waste. Acceptance is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district office.
  
4. Non-Exempt, Non-hazardous, Non-Oilfield Waste: The analytical results of \*Hazardous Waste Characterization **and** a "Certification of Waste Status" certifying the non-hazardous classification of the wastes signed by the NMED or appropriate regulatory agency. Acceptance of waste is on a case-by-case basis only after OCD approval from both Santa Fe and the appropriate district.
  
5. Hazardous Waste: At no time will wastes which are hazardous by either listing or testing be accepted at an OCD permitted disposal facility.

\* Includes corrosivity, reactivity, ignitability, and toxic constituents and a certification that no listed hazardous wastes are contained within the wastes. The samples for these analyses and results will be obtained from the wastes prior to removal from the generator's facility and without dilution in accordance with EPA SW-846 sampling procedures.





**THE REPRODUCTION OF**

**THE**

**FOLLOWING**

**DOCUMENT (S)**

**CANNOT BE IMPROVED**

**DUE TO**

**THE CONDITION OF**

**THE ORIGINAL**

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

March 9, 1993

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

ANITA LOCKWOOD  
CABINET SECRETARY

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-242-324**

Mr. Morris D. Young  
ENVIROTECH, INC.  
5796 U.S. Highway 64 - 3014  
Farmington, NM 87401

**RE: TEMPORARY STORAGE OF EXEMPT OILFIELD SOILS**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has reviewed your March 8, 1993 correspondence requesting permission to temporarily store RCRA exempt petroleum contaminated soils generated at OCD regulated facilities until the status of Envirotech Landfarm facility is resolved to OCD's satisfaction. These soils are proposed to be temporarily stored on plastic liners in a bermed and fenced area south of the access road to Landfarm #2 located in Section 6 T26N R10W NMPM, San Juan County, New Mexico. This request also asked for permission from OCD to remove heavy equipment parked at Landfarm #2 from the landfarm facility.

The above referenced temporary storage request is hereby approved with the following conditions:

1. OCD will only allow RCRA exempt petroleum contaminated soils to be temporarily stored at the above referenced site.
2. Envirotech will provide the "Certificate of Waste Status" certifying the exempt classification of all soils proposed for temporary storage to OCD for approval prior to placing soils onsite.
3. Temporarily stored soils will be removed for remediation within 30 days of the date at which OCD allows operations to resume at either Envirotech landfarm.
4. Envirotech will arrange to have an OCD representative present for entry onto the facility to remove heavy equipment.

Mr Morris D. Young  
 March 9, 1993  
 Page 2

5. Envirotech will not reestablish the interior fence separating the holding area that adjoins Landfarm #1 at this time.

The OCD reserves the right to revoke this authorization at any time and require removal of these soils should conditions warrant such action.

Please be advised that OCD approval does not relieve you of liability should your operation of this site result in actual contamination of surface water, ground water or the environment which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve you of responsibility for compliance with any other federal, state and local laws and/or regulations.

If you have any questions, please contact me at (505)827-5885.

Sincerely,



William C. Olson  
 Hydrogeologist  
 Environmental Bureau

xc: William J. LeMay, Director  
 Robert Stovall, OCD Legal Bureau  
 Frank Chavez, OCD Aztec District Supervisor

P 667 242 324

**Certified Mail Receipt**

No Insurance Coverage Provided  
 Do not use for International Mail  
 UNITED STATES POSTAL SERVICE  
 (See Reverse)

Sent to	
Street & No.	
P.O., State & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

Fold at line over top of envelope to the right of the return address.

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

June 17, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL -  
RETURN RECEIPT NO. P-327-278-194

Mr. Morris D. Young, President  
Envirotech, Inc.  
5796 U.S. Highway 64-3014  
Farmington, New Mexico 87401

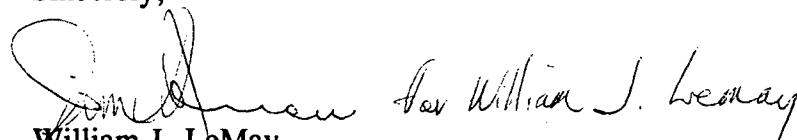
RE: Solids Disposal Facility Expansion  
San Juan County, New Mexico

Dear Mr. Young:

The expansion application for your previously permitted soil remediation facility located in Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved. The permit consists of the original permit as approved August 1, 1990, the expansion application dated February 11, 1991 and materials dated May 29, 1991 submitted as supplements to the application. The expansion application was submitted and approved pursuant to Oil Conservation Division Rule 711. All conditions contained in the original permit approval remain in effect.

Please be advised approval of this expansion does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

Sincerely,

  
William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

January 16, 1991

CERTIFIED MAIL -  
RETURN RECEIPT NO. P-327-278-039

Mr. Morris D. Young, President  
Envirotech, Inc.  
3111 Knudsen  
Farmington, New Mexico 87401

RE: Solids Disposal Facility  
San Juan County, New Mexico

Dear Mr. Young:

The Oil Conservation Division (OCD) has reviewed the data contained in the two facsimile transmissions from your office on January 11, 1991.

The Bloomfield Refinery sludge from the reduced crude storage tank does not exhibit T.C.L.P. hazardous characteristics and is therefore approved for landfarming at your disposal facility.

The data submitted for the contaminated soils you have accepted without authorization at your facility, from the Farmington Bulk Plant is insufficient to determine classification. A representative composite sample will be obtained by Envirotech of contaminated soils from the Bulk plant that have been accepted at the disposal site. Sampling methodology will be pursuant to EPA SW-846. The samples will be analyzed for all T.C. constituents. Detection limites for the analyses will be no higher than those stated in the EPA method required for T.C. constituents. Additional requirements will be determined by this office after review of the analytical results.

After review of the Envirotech file it was noted that there is not a bond in place for your facility. OCD Rule 711 requires that all commercial surface waste disposal facilities shall have a surety or cash bond in the amount of \$25,000. In order for your operations to continue, a bond must be submitted to this office for approval. A copy of the bond form is enclosed for your convenience.

Mr. Morris D. Young  
January 16, 1991  
Page -2-

If you have any questions, please contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson  
Environmental Engineer

Enclosure

RCA/sl



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

September 27, 1990

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-106-675-342**

Morris D. Young  
ENVIROTECH, INC.  
3111 Knudsen  
Farmington, NM 87401

**RE: ENVIROTECH LANDFARM OPERATIONS**

Dear Mr. Young:

On September 6, 1990, you accompanied New Mexico Oil Conservation Division (OCD) Environmental Bureau employees William Olson and Roger Anderson on an inspection of the ENVIROTECH Solids Disposal Facility south of Bloomfield, New Mexico. During the September 6, 1990 inspection, OCD observed numerous piles of petroleum contaminated soils which were dumped from trucks and not spread on the surface of the disposal area. OCD informed you that failure to spread solids in six-inch maximum lifts violates the conditions of OCD's August 1, 1990 approval of your solids disposal facility permit. At that time, you committed to spreading the soils in six-inch maximum lifts by Monday September 10, 1990.

On September 14, 1990, OCD employee William Olson inspected the facility and observed that the above described soils were not spread in six-inch lifts as per your September 6, 1990 commitment.

On September 25, 1990, OCD employee Denny Foust inspected the facility and observed that piled soils still had not been spread according to your September 6, 1990 commitment.

You are hereby notified that you are in violation of the terms and conditions of the OCD approval dated August 1, 1990 to operate the ENVIROTECH Solids Disposal Facility. You are hereby ordered to take the following actions within 72 hours of receipt of this letter:

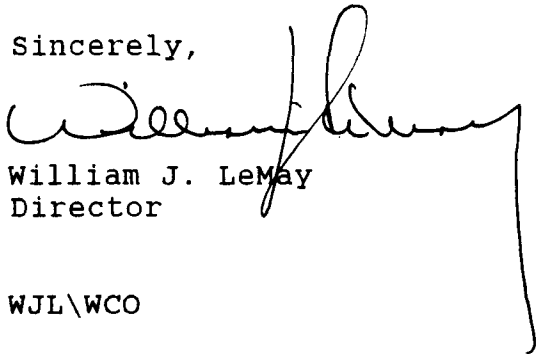
- 1) Grade all piled soils into six-inch maximum lifts.

- 2) Disc all soils that have been spread since the opening of the facility including soils in item 1 above.
- 3) Report compliance with OCD requirements to the Santa Fe OCD office.

In the future, all accepted solids will be spread in six-inch maximum lifts within 24 hours of acceptance. Continued operation of this facility will be allowed only so long as the facility complies with the terms and conditions of OCD's August 1, 1990 approval and the requirements of this letter.

If you have any questions, please contact William Olson at (505)827-5885 or Roger Anderson at (505)827-5884.

Sincerely,



William J. LeMay  
Director

WJL\WCO

xc: OCD Aztec Office





STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

September 14, 1990

CERTIFIED MAIL - RETURN RECEIPT NO. P-918-402-483

Mr. Morris D. Young, President  
Envirotech, Inc.  
3111 Knudsen  
Farmington, New Mexico 87401

RE: Soil Remediation Facility Expansion  
Envirotech Solids Disposal Facility, San Juan County, New Mexico

Dear Mr. Young:

The Oil Conservation Division (OCD) has received and reviewed your request, dated September 10, 1990, to extend the active landfarm remediation area to the South and West property lines. The requested extension area falls within the confines of the original approval. You are therefore authorized to utilize the requested area for active landfarming.

The preparation of the extended landfarm area will be as committed to in your September 10, 1990 request.

Operation of the area will be pursuant to conditions set forth in the original approval dated August 1, 1990.

Please be advised this approval does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson, Engineer

cc: OCD Aztec Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

GARREY CARRUTHERS  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

August 1, 1990

CERTIFIED MAIL  
RETURN RECEIPT NO. P-918-402-292

Mr. Morris D. Young, President  
Envirotech, Inc.  
3111 Knudsen  
Farmington, New Mexico 87401

RE: Solids Disposal Facility  
San Juan County, New Mexico

Dear Mr. Young:

The Oil Conservation Division (OCD) has received and reviewed your application, dated June 1, 1990, for construction and operation of a soil remediation facility located in the NE/4 SE/4, Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. The above referenced application is hereby approved in accordance with OCD Rule 711 with the following conditions:

1. No liquids will be disposed of at the facility.
2. Solids will be spread on the surface in six inch lifts or less and disked on a monthly basis to enhance biodegradation of contaminants.
3. No solids will be spread on previously spread solids until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 ppm and the sum of all aromatic hydrocarbons is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained. Authorization from the OCD will be obtained prior to application of successive lifts.

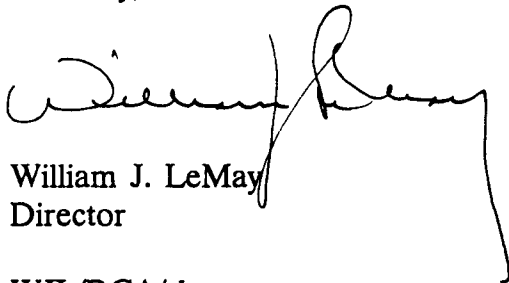
Mr. Morris D. Young  
August 1, 1990  
Page -2-

4. Only solids that are non-hazardous by RCRA Subtitle C exemption or by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C will be tested for appropriate hazardous constituents prior to disposal.
5. An attendant will be present when the facility is open for receipt of solids. At all other times the facility will be locked and secure to prevent unauthorized dumping.
6. Comprehensive records of all material disposed of at the facility will be maintained. The records for each load will include:
  - a. origin
  - b. analysis for hazardous constituents if required
  - c. transporter

Please be advised approval of this facility does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec Office