

NM1 - 7

GENERAL CORRESPONDENCE

YEAR(S):

2001 - 1990

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 12, 2001

New Mexico Oil Conservation Division
Attn: Martyne Kieling
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504



Re: Final Closure Report for Landfarm #1.

Dear Ms. Kieling

Envirotech has received "Discontinued Maintenance Status" for all cell in Envirotech's Soil Remediation Facility Landfarm #1. In accordance with the Closure of Landfarm #1 application dated March 15, 2000 the following conditions have been met and final closure is requested.

All berms located within Landfarm #1 were leveled, except the berm located from B-3 to F-8 and A'-4 to K-12 (along the canyon rim) which were left to control erosion and runoff. All cells were seeded with a custom dry pasture mix from Southwest Seed in Cortez, CO with the exception of the 20 acres that were leased to Lefarge for a batch plant. The pile of concrete that was in the north-east corner of the landfarm was buried and the hills were rounded to help promote vegetative growth. All fencing was left in place to restrict access by livestock.

Respectfully submitted,
Envirotech Inc.

Christine M. Walters
Christine M. Walters
Laboratory Coordinator / Environmental Scientist



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 3, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-599-573-289

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

RE: Closure Plan for Landfarm #1 Permit No. 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 Plan dated March 15, 2000 for Landfarm # 1 at the above referenced location. Based on OCD discontinued maintenance status approval letters dated April 23, 1997, April 17, 1998, November 18, 1999 and April 3, 2000 the cells within landfarm #1 have been remediated to OCD standards. The remaining cells outlined in Envirotech's March 10, 2000 letter (Bio-Cells A'-4, 5, 6, 7, 8, 9, 10, 11, and 12; and Bio-Cells A-4, 5, 6, 7, 8, 9, 10, 11, and 12; and Cells F-15, H-15, I-15, J-15, K-15, I-14 and I 15) have never received material for landfarming. **The OCD hereby approves of the closure plan with the following condition:**

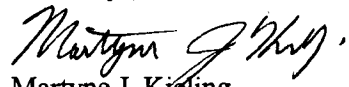
Additional wastes may not be disposed of or managed on the property.

Envirotech shall submit a final closure report to the OCD Santa Fe office and a copy to the Aztec District office when closure is complete.

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 do not hesitate to contact me at (505) 827-7153.

Sincerely,


Martyne J. Kieling
Environmental Geologist

xc: OCD Aztec Office



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 3, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-599-573-288

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Landfarm #1
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) has received Envirotech Inc.'s (Envirotech) data packets submitted on March 6, 2000 concerning the request for discontinued maintenance status. Based on the information provided the following cells of Landfarm #1 are hereby **approved** for discontinued maintenance status:

Bio Cell B-11

Bio Cell E-9

Bio Cell E-10

Cell A'-15

Cell A-14

Cell C-12

Cell D-11

Cell E-15

Note that authorization is being granted to discontinue maintenance. If Envirotech wants to add successive lifts, maintenance and treatment zone monitoring will resume. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Please be advised that OCD approval does not relieve Envirotech of liability should their operation 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 and/or local regulations.

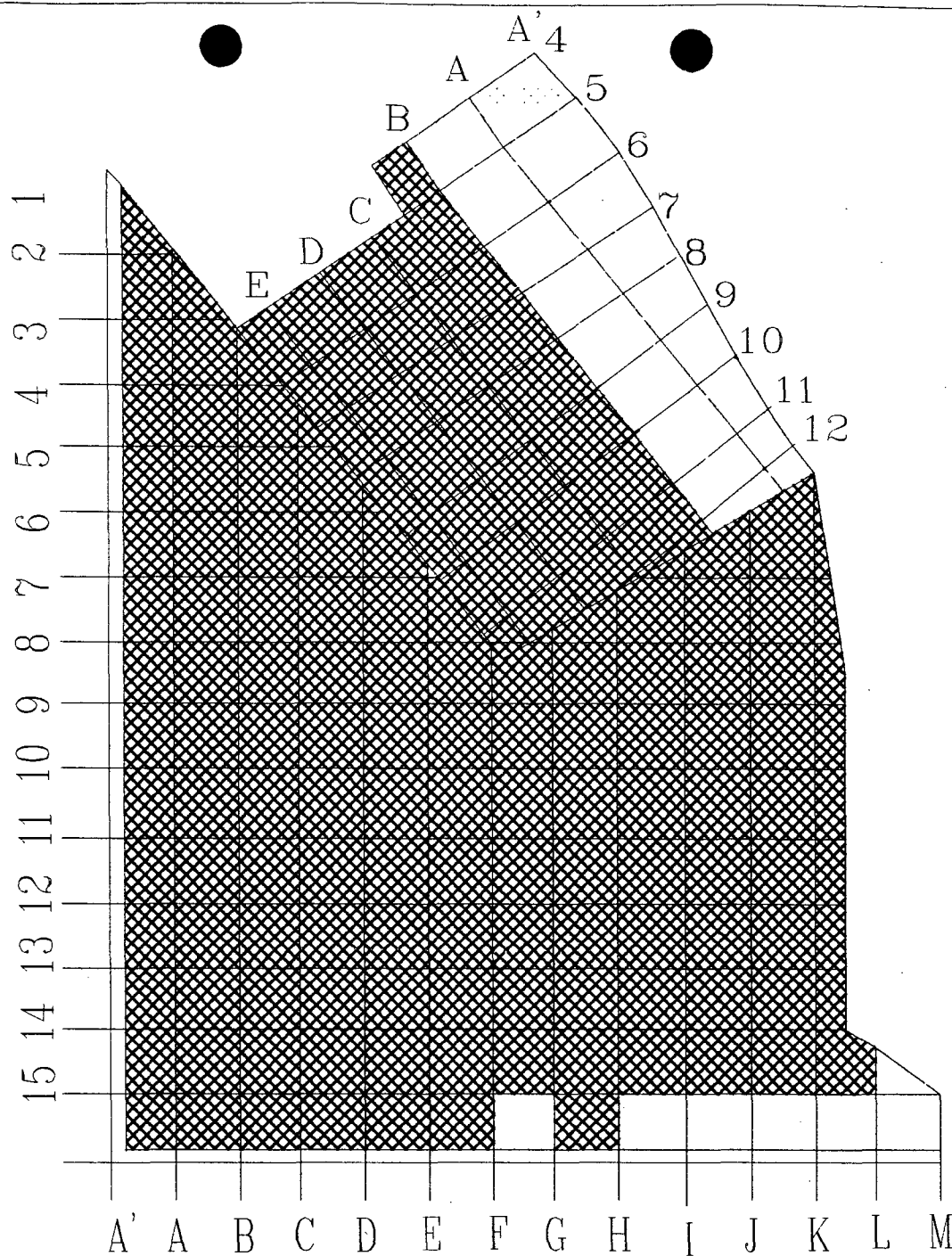
If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martynne J. Kieling
Martynne J. Kieling
Environmental Geologist






xc: OCD Aztec Office

State Highway 44



ENVIROTECH INC.
LANDFARM #1

KEY

-  Closed by OCD
-  Closed by Env.
-  Open (Hot)
-  TPH by 8015
-  Closed by Env.

Drawn By: CMW

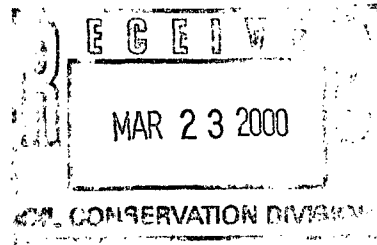
Revised: 2/16/00

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 15, 2000

New Mexico Oil Conservation Division
Attn: Martyne Kieling
2040 S. Pacheco
Santa Fe, New Mexico 87505



Re: Closure of Landfarm #1, application for secondary use.

Dear Ms. Kieling:

Envirotech Inc. has completed closure sampling and obtained "Discontinued Maintenance Status" for all cells in Envirotech's Soil Remediation Facility Landfarm #1. We are hereby requesting that the cells and landfarm be classified as closed.

It is our intention to leave fences and berms in place for the foreseeable future. Fencing will restrict access by livestock when a suitable seed mix is applied for ground cover. We currently have a recommended seed blend from the Soil Conservation Service that should provide good cover when seeded takes place. The berms will aid in controlling run-on and run-off from the site.

Envirotech currently has an opportunity to lease a twenty (20) acre section of the "former" landfarm to a construction company involved in the widening of US Highway 550/NM44. The leased property would be used as a construction yard, asphalt batch plant site, and material stockpile yard. Interior fencing is to be provided by the contractor. A proposed contract warrants that the contractor will reclaim the site at the end of construction activities (+/- 3 years). Contractor closure activities include removal of their construction yard fencing, mitigation of any on-site impacts, site grading, and seeding. Envirotech proposes to seed of the "un-leased" section of the landfarm immediately upon your authorization to begin closure activities. Undisturbed areas will not be re-seeded.

Construction activities are scheduled to commence on or about April 1, 2000. For this reason we would appreciate a timely response to this request. If you have any questions or comments please feel free to contact us at 800-362-1879.

Respectfully submitted,
Envirotech Inc.






Christine M. Walters
Laboratory Coordinator / Environmental Scientist

State Highway 44

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A' A B C D E F G H I J K L M

KEY

-  Closed by OCD
-  Closed by Env.
-  Open (Hot)
-  TPH by 8015
-  Closed by Env.

Drawn By: CMW
Revised: 2/16/00

ENVIROTECH INC.
LANDFARM #1

Proposed 20 acre
section for
lease.

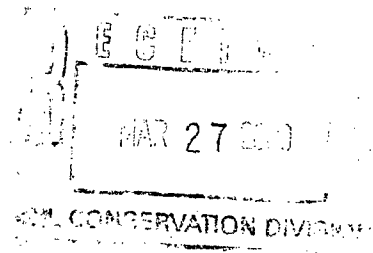


ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 10, 2000

Ms. Martyne J. Kieling
State of New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505



Dear Ms. Kieling

The following is a list of cells that are empty (no material was received), located within the Envirotech Soil Remediation Facility (ESRF) Landfarm # 1, Landfarm #2 main cells and Unit 4 Hilltop, New Mexico.

Landfarm #1 (Bio Cells):

A' - 4, 5, 6, 7, 8, 9, 10, 11 and 12

A - 4, 5, 6, 7, 8, 9, 10, 11 and 12

Landfarm #1 (Main Cells):

F - 15

H - 15

I - 15

J - 15

K - 15

I - 14 and 15

Landfarm #2 (Main Cells):

D - 26

E - 22, 23 and 25

F - 20, 21, 22, 23, 24, 25 and 26

G - 16, 17, 19 and 20

H - 17

I - 17, 18 and 21

J - 14, 15, 16, 17, 21 and 24

K - 14, 15, 21, 24, 25 and 26

L - 21, 22, 23, 24 and 25

M - 21, 22, 23 and 24

N - 20, 21 and 22

O - 19, 20 and 21

P - 18 and 19

Landfarm #2 Unit 4

A - 5, 6, 9, 11, 12 and 13

D - 6

E - 6 and 7

F - 4, 6 and 7

G - 4 and 6

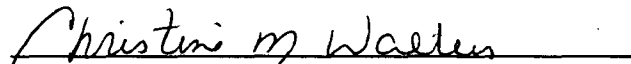
H - 3

I - 3 and 4

K - 3

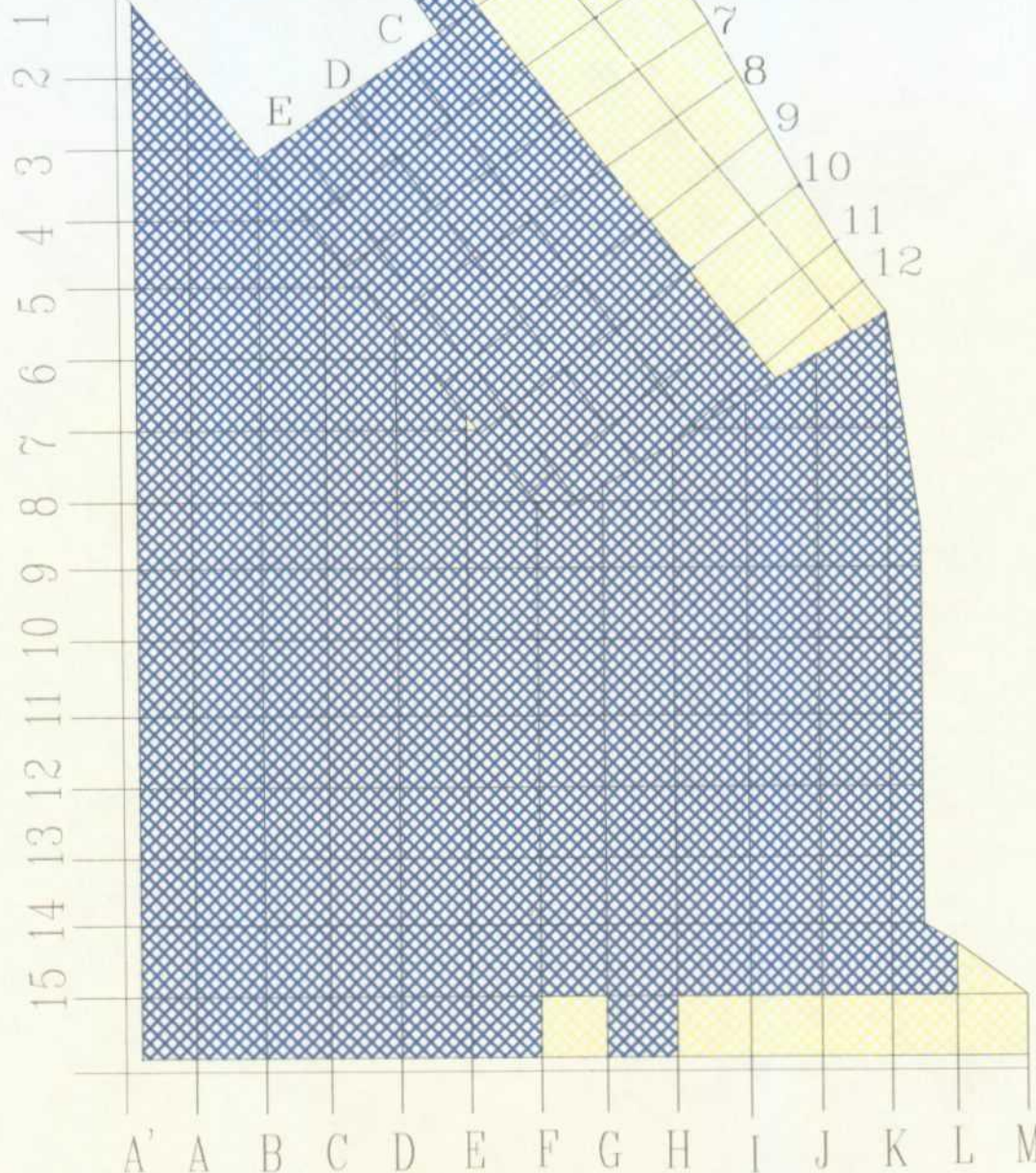
Should you have any questions or require additional information, please do not hesitate to contact me at (505) 632-0615.

Respectfully submitted,
Envirotech, Inc.


Christine M. Walters
Laboratory Coordinator / Environmental Scientist

CMW/cmw

State Highway 44



ENVIROTECH INC.
LANDFARM #1

KEY

- Closed by OCD
- Closed by Env.
- Open (Hot)
- TPH by 8015
- Closed by Env.

Drawn By: CMW

Revised: 2/16/00

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

RECEIVED

MAR 16 2000

Environmental Bureau
Oil Conservation Division

March 6, 2000

Ms. Martyne J. Kieling
State of New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Dear Ms. Kieling

Envirotech, Inc. respectfully requests "Discontinued Maintenance Status" (DMS) for the soil contained in the following cell located within the Envirotech Soil Remediation Facility (ESRF), Landfarm # 1, Hilltop, New Mexico.
Cells:

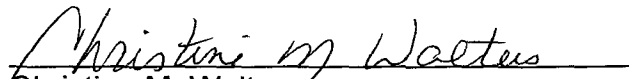
A'-15, A-14, C-12, D-11 AND E-15

BIO Cells:

B-11, E-9 and E-10

Should you have any questions or require additional information, please do not hesitate to contact me at (505) 632-0615.

Respectfully submitted,
Envirotech, Inc.


Christine M. Walters

Laboratory Coordinator / Environmental Scientist

CMW/cmw

Potouri



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

RECEIVED APR 21 1998

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-419

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #1
NE 1/4 SE 1/4 of Section 26, Twn. 27 North, Rng. 11 West, NMPM
San Juan County, New Mexico**

Dear Mr Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) letter, dated February 2, 1998 and data packets concerning the request for discontinued maintenance status. Based on the information provided the following main cells and bio cells of Land Farm # 1 are hereby approved for discontinued maintenance status:

Cell A'8	Cell B-10	Cell D-12	Cell I-1314
Cell A'-12	Cell B-12	Cell D-14	Cell J-14
Cell A'-13	Cell B-14	Cell E-11	Cell K-14
Cell A'-14	Cell C-11	Cell F-11	
Cell A- 3	Cell C-14	Cell G-13	
Cell A- 12	Cell C-15	Cell H-14	

Bio Cell B-7	Bio Cell C-7	Bio Cell C-12	Bio Cell D-11
Bio Cell B-8	Bio Cell C-8	Bio Cell D-9	Bio Cell E-9
Bio Cell B-9	Bio Cell C-9	Bio Cell D-10	Pit Area

Note that authorization is being granted to discontinue maintenance. If Envirotech wants to add successive lifts, maintenance and treatment zone monitoring will resume. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Please be advised that the OCD approval does not relieve Envirotech of liability should their operation 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,

Mr. Young
April 17, 1998
Page 2

state and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script, appearing to read "Martyne J. Kieling".

Martyne J. Kieling
Environmental Geologist

xc: OCD Aztec Office

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Mr. Roger C. Anderson
State of New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Date: 1/29/98

RECEIVED
FEB - 4 1998

OIL CON. DIV.
DIST. 3

Dear Mr. Anderson:

Envirotech Inc. respectfully requests "Discontinued Maintenance Status" (DMS) for the soils contained in the following cell(s) within the Envirotech Soil Remediation Facility (ERSF) Hilltop, New Mexico.

Generator Information:

Generator	Date	Source Location	Description	Vol yd ³
	9.18.96	MTL From	LF1: C-9	220

Sampling Documentation:

A	13	14	15
B		X	X
C		X	X

Landfarm # 1 Cell(s): B-14
Sample Date: 2/14/97 Sampler: Jack Collins
Type: 5 Point Composite Analysis: BTEX, TPH

Results:

Sample ID	Pass/Fail	Benzene, mg/Kg (ppm)	Total BTEX, mg/Kg (ppm)	TPH, mg/Kg (ppm)
Cell B-14	Pass	2.0088	0.0738	46.7

Respectfully submitted,
Envirotech Inc.

Christine Walters
Christine M. Walters
Laboratory Technician

cc: Mr. Denny Foust, NMOCD Aztec, NM Office.

For State Use Only:

DMS has been granted for the cell or block of cells mentioned herein.

NMOCD Aztec _____

Date _____

NMOCD Santa Fe
...H:\Las\Form\oodms

Date 3-4-98

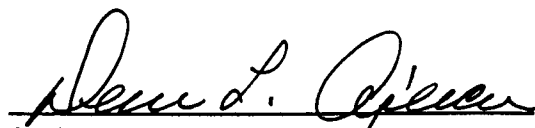
Client:	Envirotech Inc.	Project #:	91020
Sample ID:	Cell B - 14	Date Reported:	02-21-97
Laboratory Number:	A957	Date Sampled:	02-14-97
Chain of Custody No:	5071	Date Received:	02-14-97
Sample Matrix:	Soil	Date Extracted:	02-20-97
Preservative:	Cool	Date Analyzed:	02-20-97
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

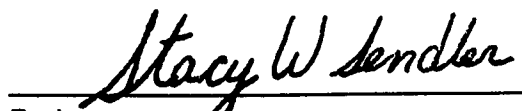
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	0.9	0.2
Diesel Range (C10 - C28)	45.8	0.1
Total Petroleum Hydrocarbons	46.7	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: Landfarm #1, 5 point Composite.


Analyst


Review

Client:	Envirotech Inc.	Project #:	91020
Sample ID:	Cell B - 14	Date Reported:	02-21-97
Laboratory Number:	A957	Date Sampled:	02-14-97
Chain of Custody:	5071	Date Received:	02-14-97
Sample Matrix:	Soil	Date Analyzed:	02-20-97
Preservative:	Cool	Date Extracted:	02-20-97
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	8.8
Toluene	23.8	8.4
Ethylbenzene	ND	7.6
p,m-Xylene	27.6	10.8
o-Xylene	16.3	5.2
Total BTEX	73.8	

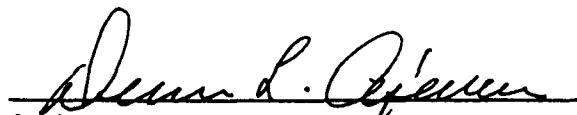
ND - Parameter not detected at the stated detection limit.

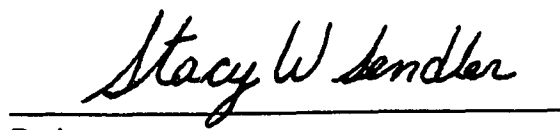
Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	100 %
	Bromofluorobenzene	101 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: Landfarm #1, 5 Point Composite.


Analyst


Review

QUALITY ASSURANCE / QUALITY CONTROL
DOCUMENTATION

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

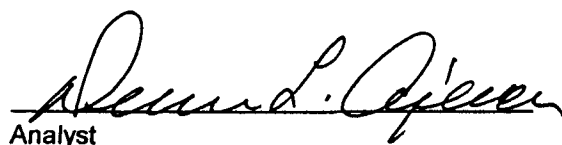
Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	02-21-97
Laboratory Number:	02-20-TPH.BLANK	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-20-97
Condition:	N/A	Analysis Requested:	TPH

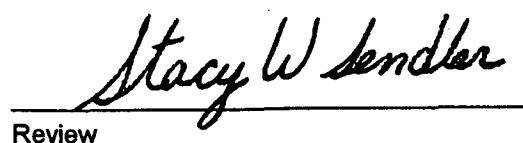
Parameter	Concentration (mg/L)	Det. Limit (mg/L)
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	02-21-97
Laboratory Number:	A955	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Analyzed:	02-20-97
Condition:	Cool and Intact	Analysis Requested:	TPH

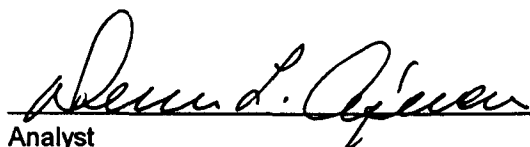
Parameter	Sample Result (mg/Kg)	Duplicate Result (mg/Kg)	Percent Difference
Gasoline Range (C5 - C10)	ND	ND	0.0%
Diesel Range (C10 - C28)	44.7	45.4	1.6%
Total Petroleum Hydrocarbons	44.7	45.4	1.6%

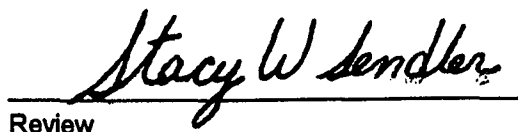
ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Max Difference
	Petroleum Hydrocarbons	30%

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Spike	Date Reported:	02-21-97
Laboratory Number:	A955	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Analysis Requested:	TPH	Date Analyzed:	02-20-97
Condition:	N/A		

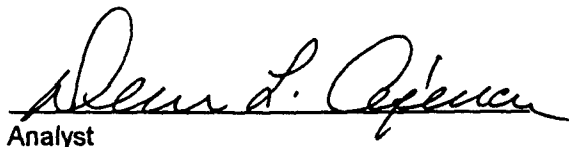
Parameter	Sample Result (mg/kg)	Spike Added (mg/kg)	Spiked Sample Result (mg/kg)	Det. Limit (mg/kg)	Percent Recovery
Gasoline Range (C5 - C10)	ND	250	250	0.2	100%
Diesel Range (C10 - C28)	44.7	250	291	0.1	99%
Total Petroleum Hydrocarbons	44.7	500	541	0.2	99%

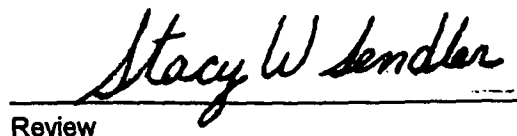
ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Acceptance Range
	Petroleum Hydrocarbons	75 - 125%

References: Method 8015, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

Client:	QA/QC	Project #:	N/A
Sample ID:	Laboratory Blank	Date Reported:	02-21-97
Laboratory Number:	02-20-BTEX.BLANK	Date Sampled:	N/A
Sample Matrix:	Water	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	02-20-97
Condition:	N/A	Analysis Requested:	BTEX

Parameter	Concentration (ug/L)	Det. Limit (ug/L)
Benzene	ND	0.2
Toluene	ND	0.2
Ethylbenzene	ND	0.2
p,m-Xylene	ND	0.2
o-Xylene	ND	0.1

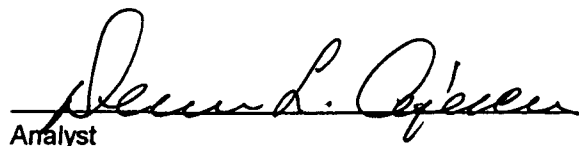
ND - Parameter not detected at the stated detection limit.

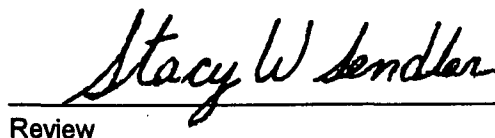
Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	98 %
	Bromofluorobenzene	101 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client:	QA/QC	Project #:	N/A
Sample ID:	Matrix Duplicate	Date Reported:	02-21-97
Laboratory Number:	A955	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	Cool	Date Analyzed:	02-20-97
Condition:	Cool and Intact	Analysis Requested:	BTEX

Parameter	Sample Result (ug/Kg)	Duplicate Result (ug/Kg)	Det. Limit (ug/Kg)	Percent Difference
Benzene	ND	ND	8.8	0.0%
Toluene	9.6	9.7	8.4	1.0%
Ethylbenzene	18.6	18.9	7.6	1.8%
p,m-Xylene	74.8	72.0	10.8	3.7%
o-Xylene	16.6	16.6	5.2	0.0%


ND - Parameter not detected at the stated detection limit.

QA/QC Acceptance Criteria:	Parameter	Maximum Difference
	8020 Compounds	30 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8020 AROMATIC VOLATILE ORGANICS

Client: QA/QC
Sample ID: Matrix Spike
Laboratory Number: A955
Sample Matrix: Soil
Preservative: Cool
Condition: Cool and Intact

Project #: N/A
Date Reported: 02-21-97
Date Sampled: N/A
Date Received: N/A
Date Extracted: 02-20-97
Date Analyzed: 02-20-97

Parameter	Sample Result (ug/Kg)	Spike Added (ug/Kg)	Spiked Sample Result (ug/Kg)	Det. Limit (ug/Kg)	Percent Recovery	SW-846 % Rec. Accept. Range
Benzene	ND	50.0	49.8	8.8	100%	39-150
Toluene	9.6	50.0	58.3	8.4	98%	46-148
Ethylbenzene	18.6	50.0	68.3	7.6	100%	32-160
p,m-Xylene	74.8	100	176	10.8	100%	46-148
o-Xylene	16.6	50.0	66.2	5.2	99%	46-148

ND - Parameter not detected at the stated detection limit.

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: QA/QC for samples A955 - A963.


Analyst


Review

CHAIN OF CUSTODY RECORD

Client/Project Name			Project Location		Chain of Custody Tape No.		ANALYSIS/PARAMETERS		Remarks	
Envirotech Inc.			LE-1		98020					
Sample: (Signature) <i>Clark Collins</i>										
Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix	No. of Containers					
A-14	2-14-97	1420	A955	Soil	1	✓	✓			5-pt. Composite
A-14		1428	A956		1	✓	✓			
B-14		1435	A957		1	✓	✓			
C-14		1440	A958		1	✓	✓			
D-14		1451	A959		1	✓	✓			
E-14		1457	A960		1	✓	✓			
F-14		1500	A961		1	✓	✓			
Released by: (Signature) <i>Clark Collins</i>			Date	Time	Received by: (Signature) <i>David L. Cline</i>					
Released by: (Signature)			2-14-97	1610						2-14-97 1616
Released by: (Signature)										
Released by: (Signature)										

ENVIROTECH INC.

5796 U.S. Highway 64-3014

Farmington, New Mexico 87401

(505) 632-0615



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

November 18, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936- 665

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Landfarm #1
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) has received Envirotech Inc.'s (Envirotech) data packets submitted on November 16, 1999 concerning the request for discontinued maintenance status. Based on the information provided the following cells of Landfarm #1 are hereby **approved** for discontinued maintenance status:

Bio Cell B-10

Bio Cell C-10

Bio Cell C-11

Cell A-15

Cell B-15

Cell D-15

Cell G-15

Note that authorization is being granted to discontinue maintenance. If Envirotech wants to add successive lifts, maintenance and treatment zone monitoring will resume. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Please be advised that OCD approval does not relieve Envirotech of liability should their operation 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 and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kieling
Environmental Geologist

xc: OCD Aztec Office

ACTIVE CELLS X Approved 1997 April 23

X Approved 1998 April 17.

X Approved 1999 NOVEMBER 18

MAIN CELLS

BIO CELLS

ROAD

N

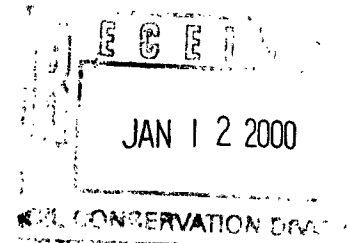
RECEIVED
NOV 28 1995

OIL CON. DIV.
DIST. 3

11/27/95

ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



November 29, 1999

Ms. Martyne J. Kieling
State of New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Dear Ms. Kieling

Envirotech, Inc. respectfully requests "Discontinued Maintenance Status" (DMS) for the soil contained in the following cell located within the Envirotech Soil Remediation Facility (ESRF), Landfarm # 1, Hilltop, New Mexico.

Cells:

A-15, B-15, D-15 and G-15

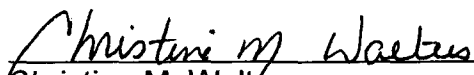
Bio Cells:

B-10, C-10 and C-11

The approval sheets, dated 9/09/99, for these cell has already been sent to your office awaiting DMS clearance.

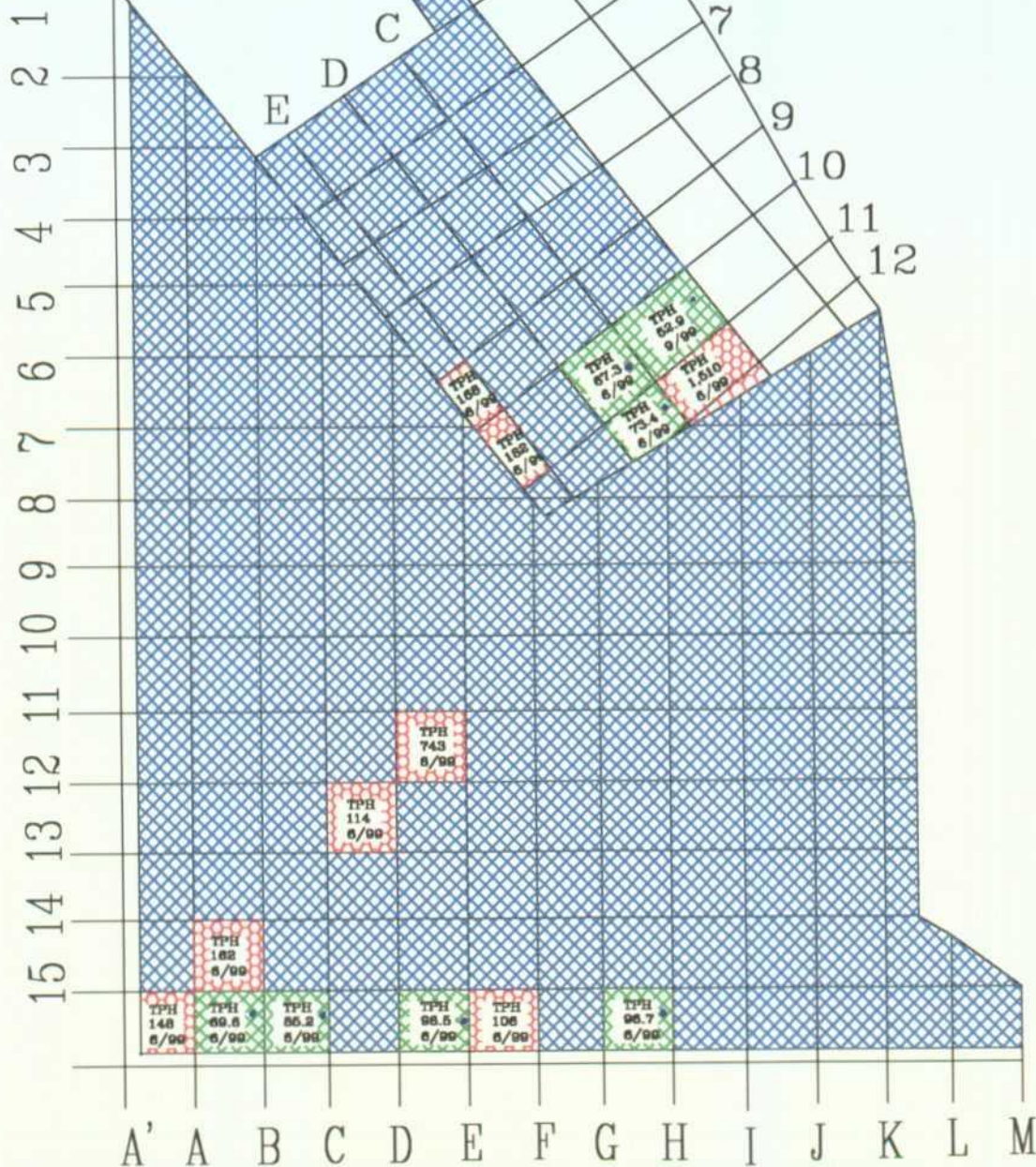
Should you have any questions or require additional information, please do not hesitate to contact me at (505) 632-0615.

Respectfully submitted,
Envirotech, Inc.


Christine M. Walters
Laboratory Coordinator / Environmental Scientist

CMW/cmw

State Highway 44



ENVIROTECH INC.
LANDFARM #1

KEY

- Closed by OCD
- Closed by Env.
- Open (Hot)
- TPH by 8015

Drawn By: CMW

Revised: 5-05-99



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87506
(505) 927-7131

April 17, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-419

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #1
NE 1/4 SE 1/4 of Section 26, Twn. 27 North, Rng. 11 West, NMPM
San Juan County, New Mexico**

Dear Mr Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) letter, dated February 2, 1998 and data packets concerning the request for discontinued maintenance status. Based on the information provided the following main cells and bio cells of Land Farm # 1 are hereby approved for discontinued maintenance status:

Cell A'8	Cell B-10	Cell D-12	Cell I-1314
Cell A'-12	Cell B-12	Cell D-14	Cell J-14
Cell A'-13	Cell B-14	Cell E-11	Cell K-14
Cell A'-14	Cell C-11	Cell F-11	
Cell A- 3	Cell C-14	Cell G-13	
Cell A- 12	Cell C-15	Cell H-14	

Bio Cell B-7	Bio Cell C-7	Bio Cell C-12	Bio Cell D-11
Bio Cell B-8	Bio Cell C-8	Bio Cell D-9	Bio Cell E-9
Bio Cell B-9	Bio Cell C-9	Bio Cell D-10	Pit Area

Note that authorization is being granted to discontinue maintenance. If Envirotech wants to add successive lifts, maintenance and treatment zone monitoring will resume. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

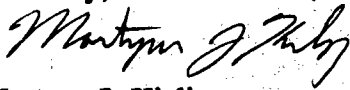
Please be advised that the OCD approval does not relieve Envirotech of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve Envirotech of the responsibility for compliance with other federal,

Mr. Young
April 17, 1998
Page 2

state and/or local regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script, appearing to read "Martyne J. Kieling".

Martyne J. Kieling
Environmental Geologist

xc: OCD Aztec Office

January 29, 1998

LANDFARM # 1

Cells submitted to OCD on 2/98 for Discontinued Maintenance Status by Envirotech Inc.

CELLS

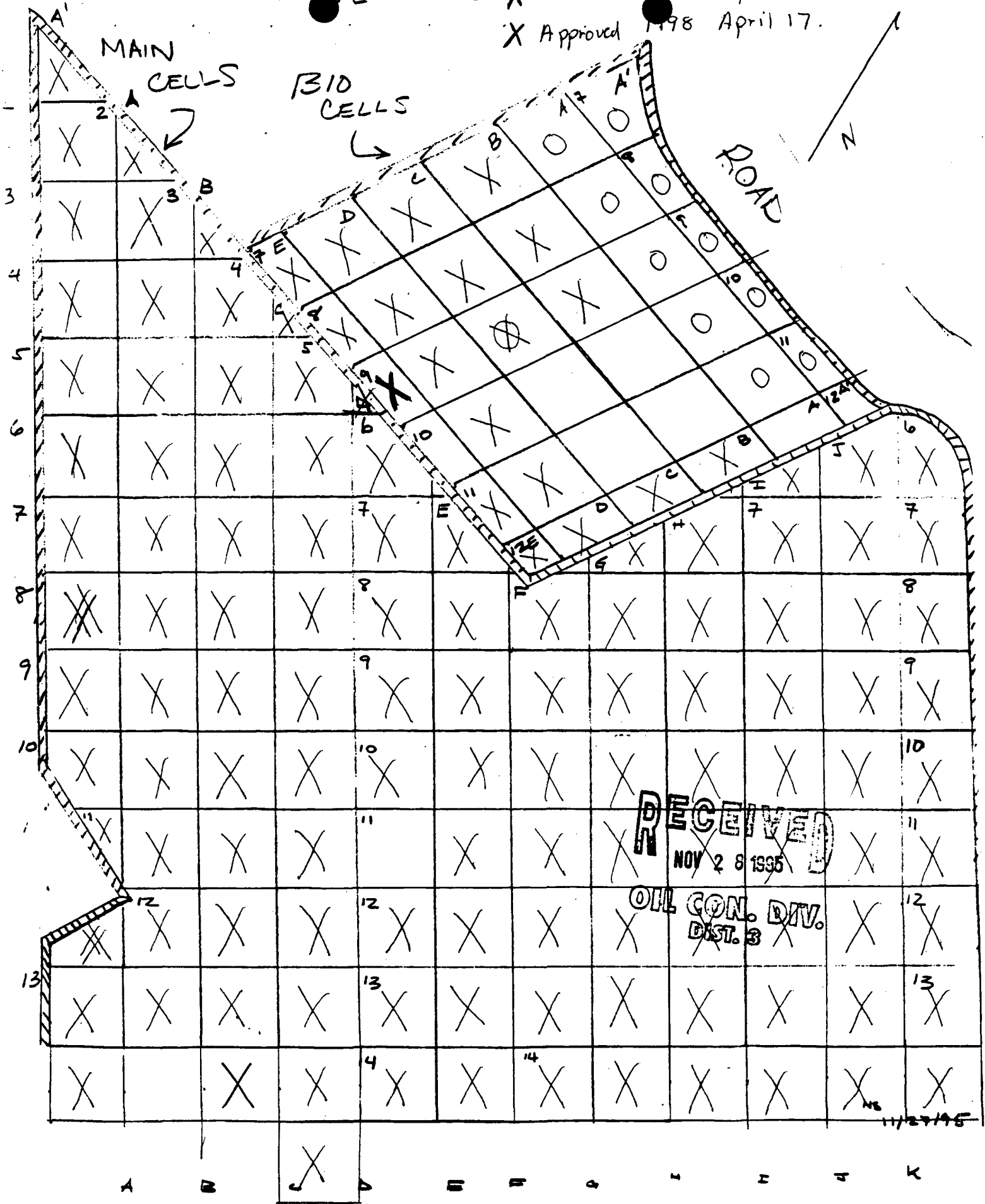
A'-08 ✓
A'-12 ✓
A'-13 ✓
A'-14 ✓
A-03 ✓
A-12 ✓
B-10 ✓
B-12 ✓
B-14 ✓ ✓
C-11 ✓
C-12 ✓
C-14 ✓
C-15 ✓
D-12 ✓
D-14 ✓
E-11 ✓
F-11 ✓
G-13 ✓
H-14 ✓
I-14 ✓
J-14 ✓
K-14 ✓

BIO CELLS

B-07 ✓
B-08 ✓
B-09 ✓
B-12 ✓
C-07 ✓
C-08 ✓
C-09 ✓
C-12 ✓
D-09 ✓
D-10 ✓
D-11 ✓
E-09 ✓

PIT AREA ✓

ACTIVE CELLS X Approved 1997 April 23
X Approved 1998 April 17.

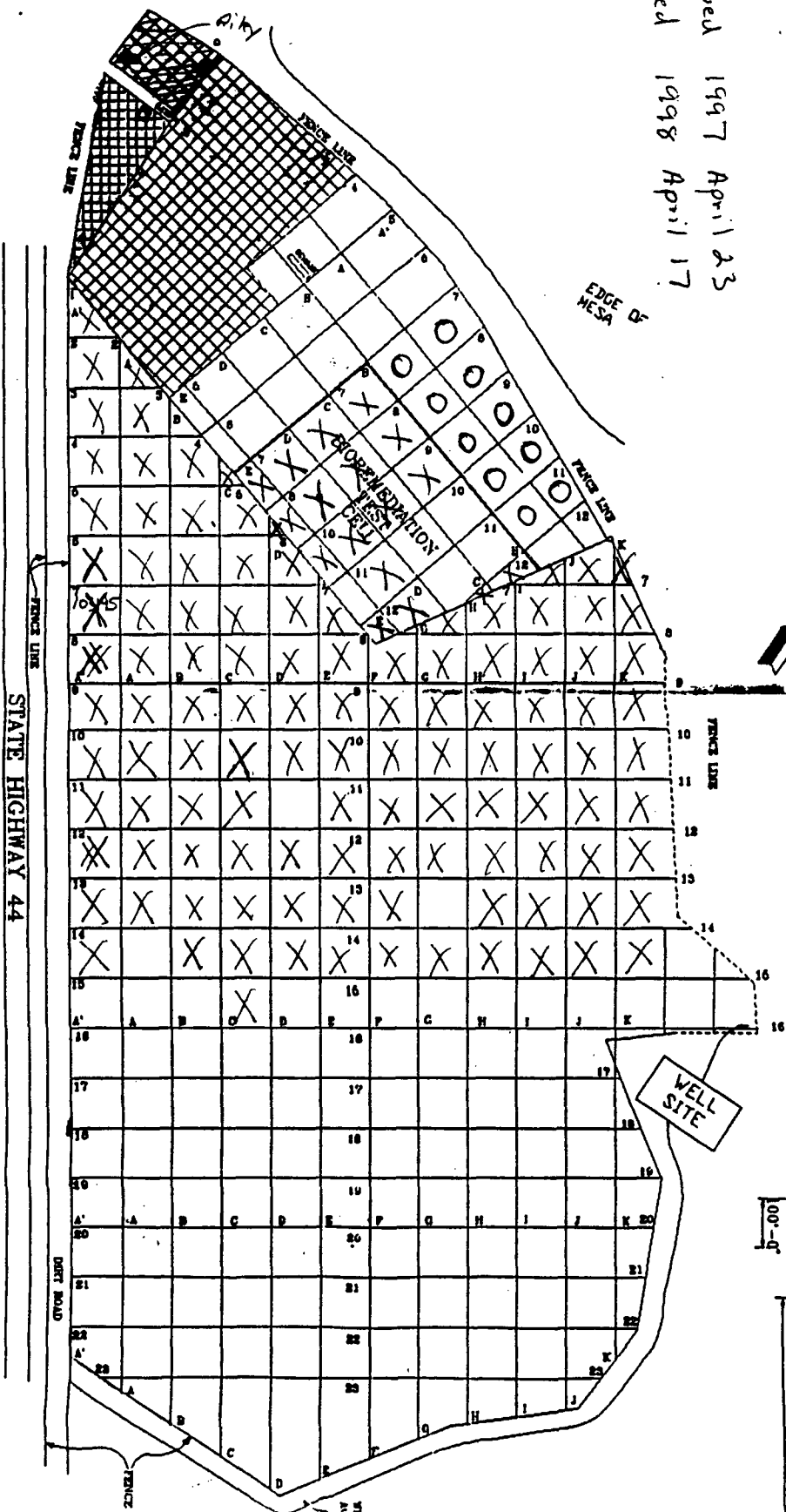


☒ BREAKING AREA FOR SOIL TO BE SCREENED.
☐ SEPARATE SCREENED BREAKING AREA.

X Approved 1997 April 23
 X Approved 1998 April 17



SCALE IN FEET



Landfarm I

Yellow areas are empty

ENVIROTECH SOIL REMEDIATION SITE HILL TOP, NEW MEXICO

DATE: OCTOBER 28, 1991
 DRAWN BY: J. DEWEY

envirotech memo/fax

to: Martype J. Kieling

company: New Mexico Energy Minerals & Natural Resources Dept.
OCG

fax #: (505) 827-8177

re: Envirotech Landfarm 2

date: 4.17.98

pages: Five (including cover sheet)

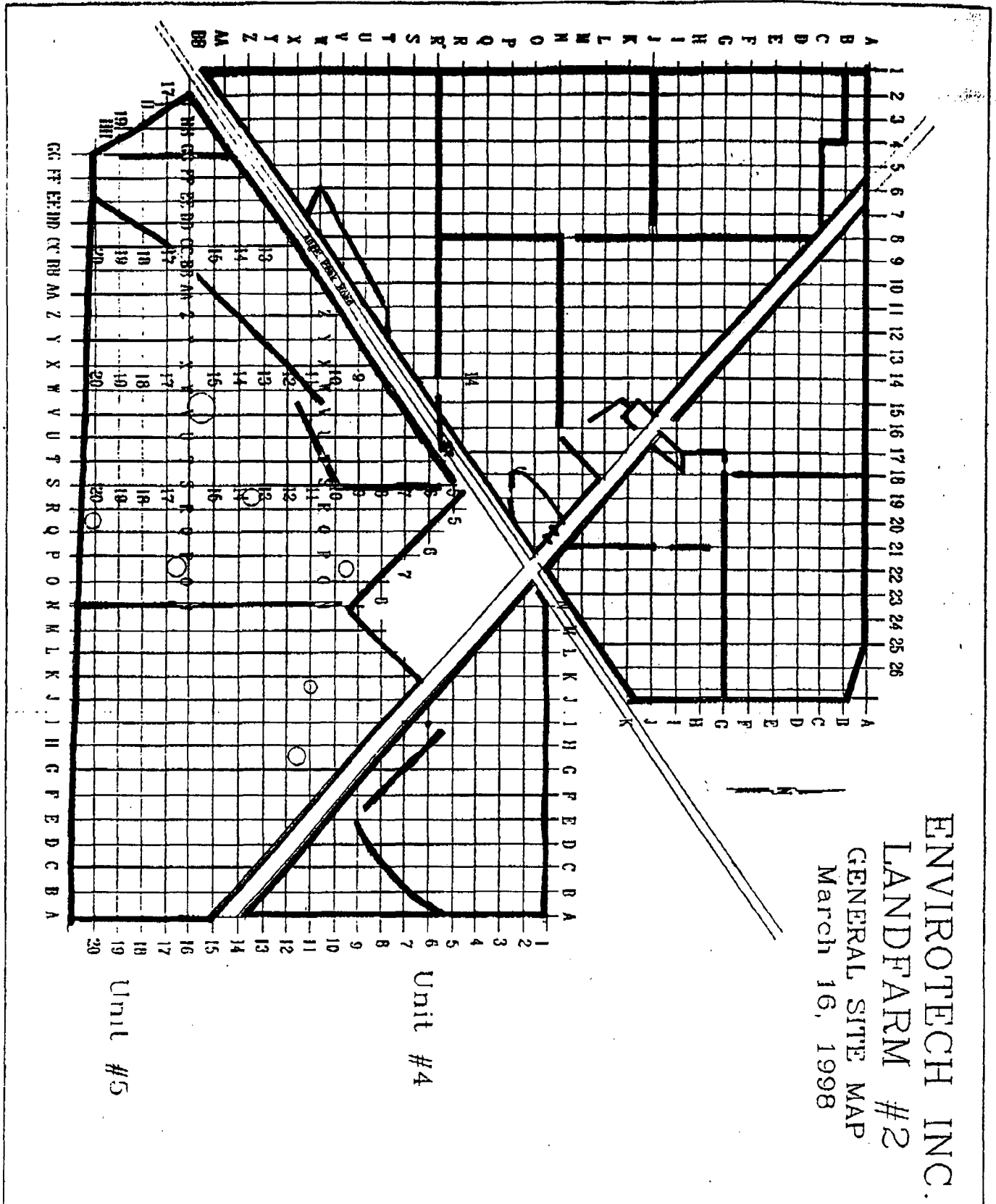
project: _____

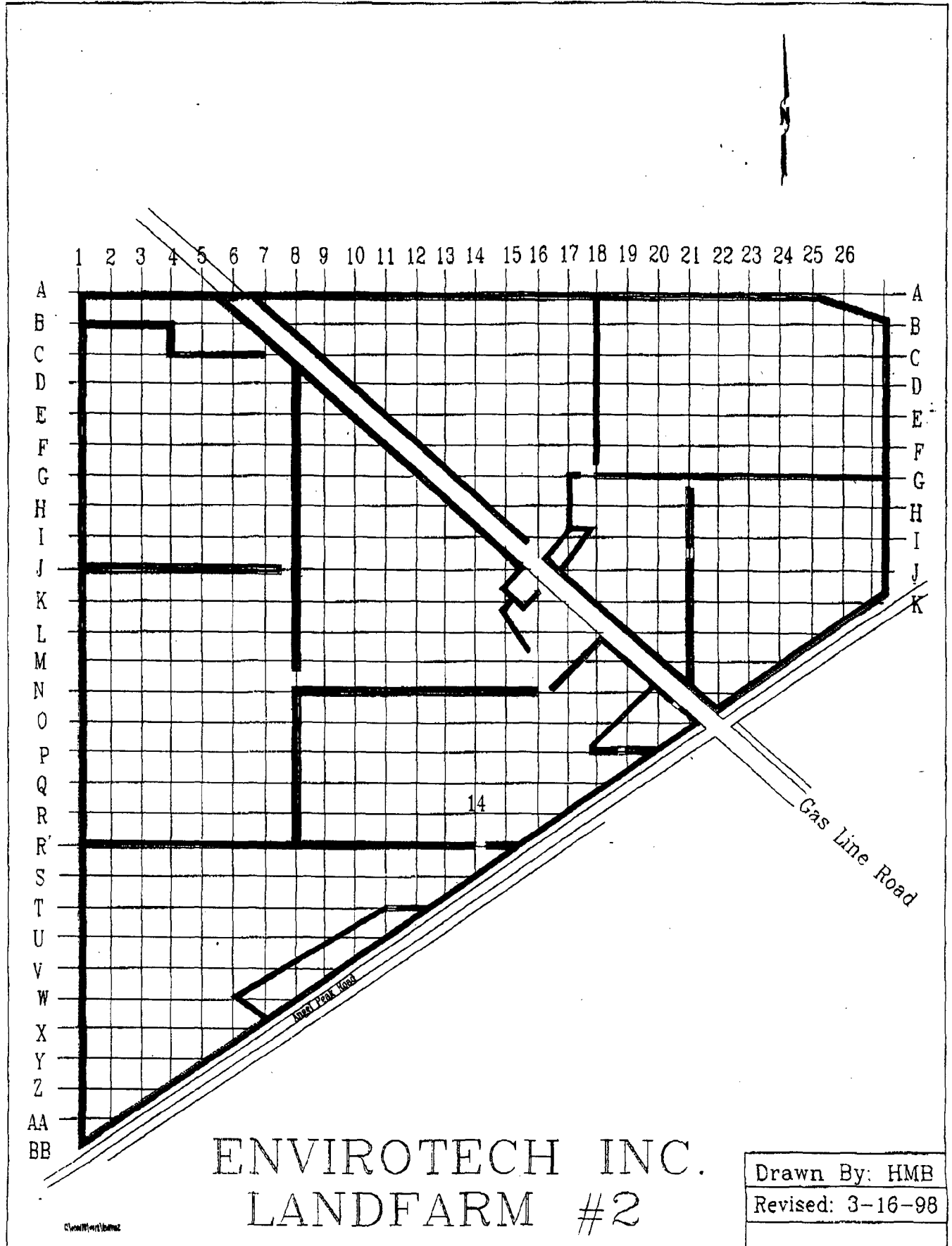
cc: _____

comments... Here are the maps you requested
for the addition made to Landfarm 2. Included
is a Aerial view of Landfarm 2, then three
additional maps of each individual unit. If you
have any additional question please call Sharon or
T. T. I will be sending you three hard copies
of each map in the mail today.

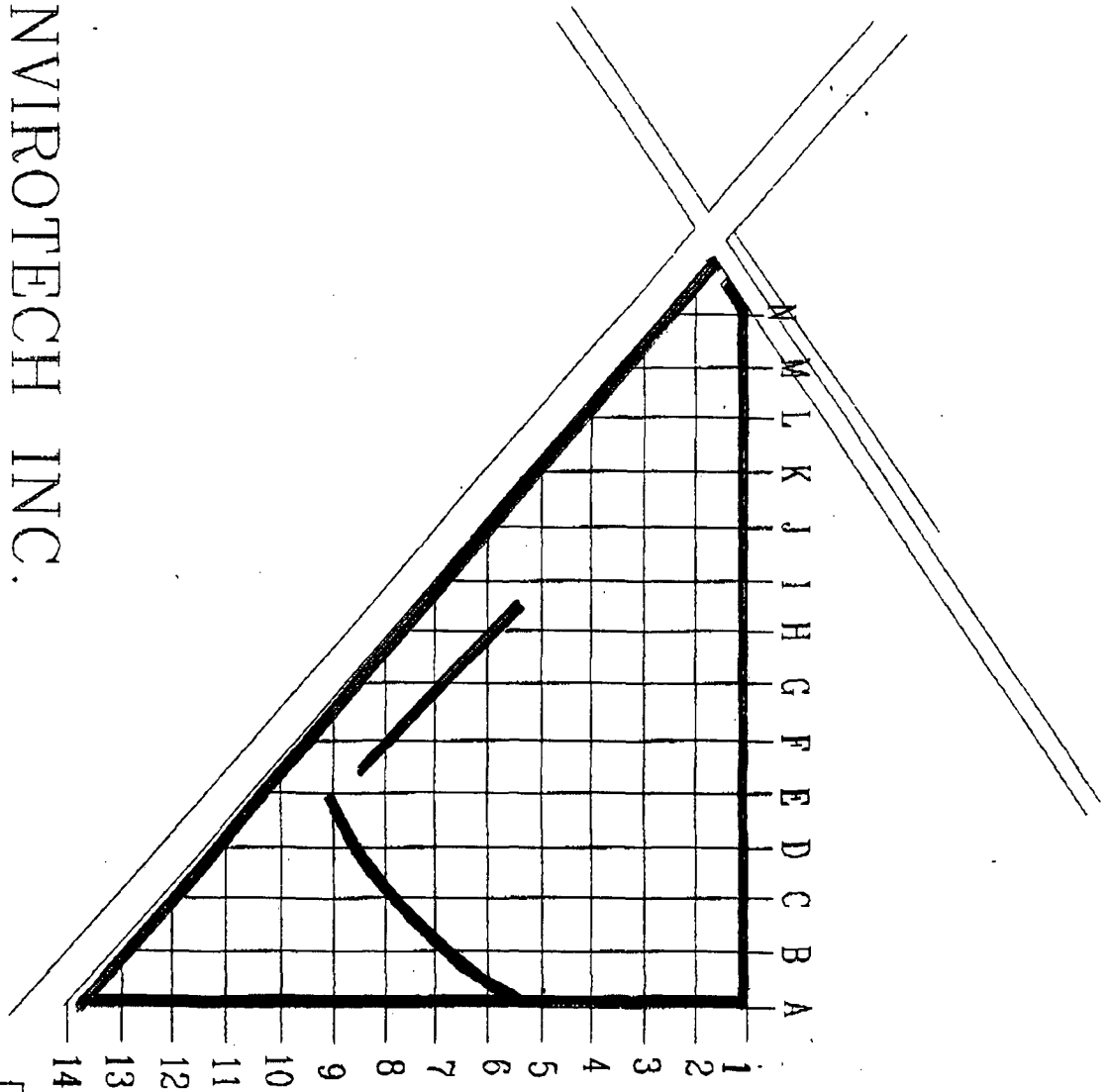
from the desk of... Christine Watten

envirotech inc.
5796 us highway 64
farmington, n. m. 87401
505.632.0615
505.632.1865 fax





ENVIROTECH INC.
LANDFARM #2
UNIT #4



Unit #4

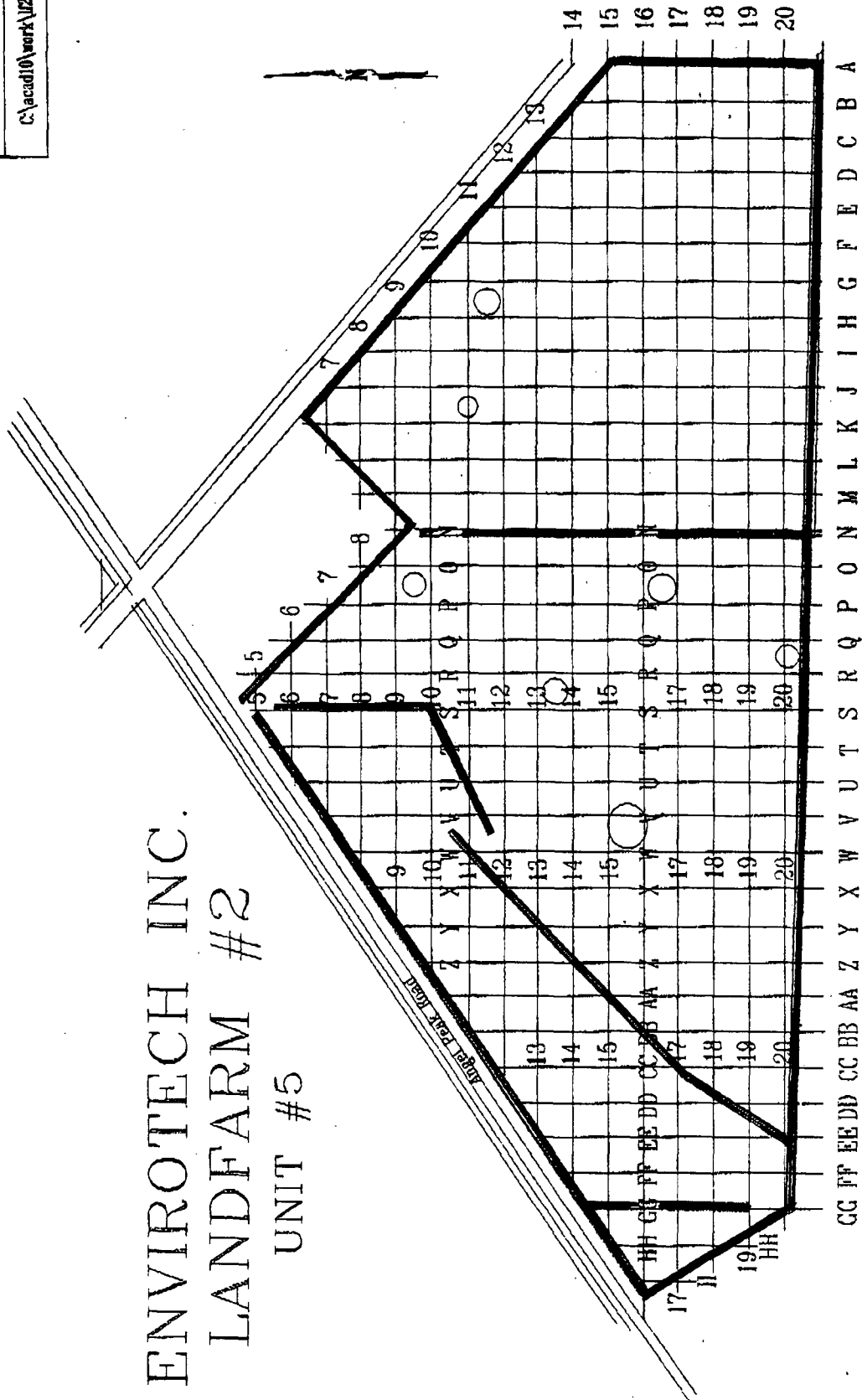
Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\122unit4

Drawn By: HMB
 Revised: 3-16-98
 C:\acad10\work\02unit5

ENVIROTECH INC. LANDFARM #2 UNIT #5

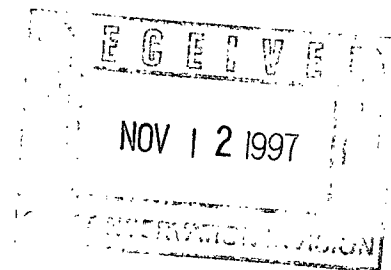


ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

November 7, 1997

Ms. Martyne J. Kieling
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505



Re: Post Closure Care Plan, Envirotech Landfarm #1

Dear Ms. Kieling,

As per your request, Envirotech Inc. is submitting this Post Closure Care Plan for our Landfarm #1 facility located approximately 12 miles south of Bloomfield, at Hilltop, New Mexico.

At this time our Landfarm #1 facility has been thoroughly sampled and is near closure. We have 13 active cells left to remediate before the land will be returned to its native condition. Each cell approximately 100' X 100' in size, with the exception of biocell E-10, which is a half-cell. All active cells have met the remediation standard for BTEX, as per USEPA Method 8020. Current TPH measurements in these active cells, as per USEPA Method 8015, ranges from 104 ppm to 1,802 ppm.

We are continuing to disk the active cells in the landfarm on a twice-monthly basis. The remaining active cells will be sampled periodically for TPH. When the concentrations in the active cells falls below 100 ppm TPH, Envirotech proposes the following closure activities:

- 1) Submit remaining closure sampling results to OCD.
- 2) Remove all fencing, cell boundary markers, piles, debris, etc. to landowner specifications.
- 3) Knock down and spread out all berms, to landowner specifications.
- 4) Re-seed with BLM Seed Mix #2, to landowner specifications.

Our current closure bond will remain in place until OCD releases it at the satisfactory conclusion of these activities.

If you have any questions or concerns, please contact us at (505) 632-0615.

Sincerely yours,
Envirotech, Inc

Robert M. Young
Vice President

cc: Denny Foust

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time	Date 10-16-97 / 10-21-97
<u>Originating Party</u>		<u>Other Parties</u>	
Martyne Kiehl		Robert Young	

Subject

Extension on Reply to Permit Deficiencies until Dec 23, 1997

Discussion

1. Land Farm #1 Analytical to close it out?

Keep Bond in Place

Submit a Closer Postclosure Care Plan within 30 days. November 17, 1997

~~21 days + 30 days~~

Verbal agreement For Submittal For a Post closure Care Plan to be Submitted within 30 days of today 10-21-97 (by 11-21-97) Original to SF copy to District. Analysis will be coming in soon For Land Farm cells. Keep 25,000 Bond in Place until Final closure

Conclusions or Agreements

Distribution

Signed

Martyne Kiehl



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

April 23, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-279

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #1
NE 1/4 SE 1/4 of Section 26, Twn. 27 North, Rng. 11 West, NMPM
San Juan County, New Mexico**

Dear Mr Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) letter, dated February 20, 1997 concerning the status of closure sampling data submitted to this office in late 1995 and early 1996. Based on the information provided the following main cells and bio cells of Land Farm # 1 are hereby approved for discontinued maintenance status:

Cell A'-1	Cell A-9	Cell C-7	Cell E-13
Cell A'-2	Cell A-10	Cell C-8	Cell E-14
Cell A'-3	Cell A-11	Cell C-9	Cell F-8
Cell A'-4	Cell A-12	Cell C-10	Cell F-9
Cell A'-5	Cell A-13	Cell C-13	Cell F-10
Cell A'-6	Cell B-3	Cell D-5	Cell F-12
Cell A'-7	Cell B-4	Cell D-6	Cell F-13
Cell A'-9	Cell B-5	Cell D-7	Cell F-14
Cell A'-10	Cell B-6	Cell D-8	Cell G-7
Cell A'-11	Cell B-7	Cell D-9	Cell G-8
Cell A'-12	Cell B-8	Cell D-10	Cell G-9
Cell A-2	Cell B-9	Cell D-13	Cell G-10
Cell A-4	Cell B-11	Cell E-7	Cell G-11
Cell A-5	Cell B-13	Cell E-8	Cell G-12
Cell A-6	Cell C-4	Cell E-9	Cell G-14
Cell A-7	Cell C-5	Cell E-10	
Cell A-8	Cell C-6	Cell E-12	

Mr. Young
April 23, 1997
Page 2 of 2

Cell H-7	Cell I-6	Cell J-6	Cell K-6
Cell H-9	Cell I-7	Cell J-7	Cell K-7
Cell H-8	Cell I-8	Cell J-8	Cell K-8
Cell H-10	Cell I-9	Cell J-9	Cell K-9
Cell H-11	Cell I-10	Cell J-10	Cell K-10
Cell H-12	Cell I-11	Cell J-11	Cell K-11
Cell H-13	Cell I-12	Cell J-12	Cell K-12
	Cell I-13	Cell J-13	Cell K-13
Bio Cell D-7	Bio Cell D-12	Bio Cell E-8	Bio Cell E-12
Bio Cell D-8	Bio Cell E-7	Bio Cell E-11	

Note that authorization is being granted to discontinue maintenance. If Envirotech wants to add successive lifts, maintenance and treatment zone monitoring will resume. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

The following 11 bio-cells of Land Farm # 1 were **not approved** due to excessive holding time prior to analysis:

Bio Cell A'-7	Bio Cell A'-10	Bio Cell A-8	Bio Cell A-11
Bio Cell A'-8	Bio Cell A'-11	Bio Cell A-9	Bio Cell C-11
Bio Cell A'-9	Bio Cell A-7	Bio Cell A-10	

Please be advised that the OCD approval does not relieve Envirotech of liability should their operation 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 and/or local regulations.

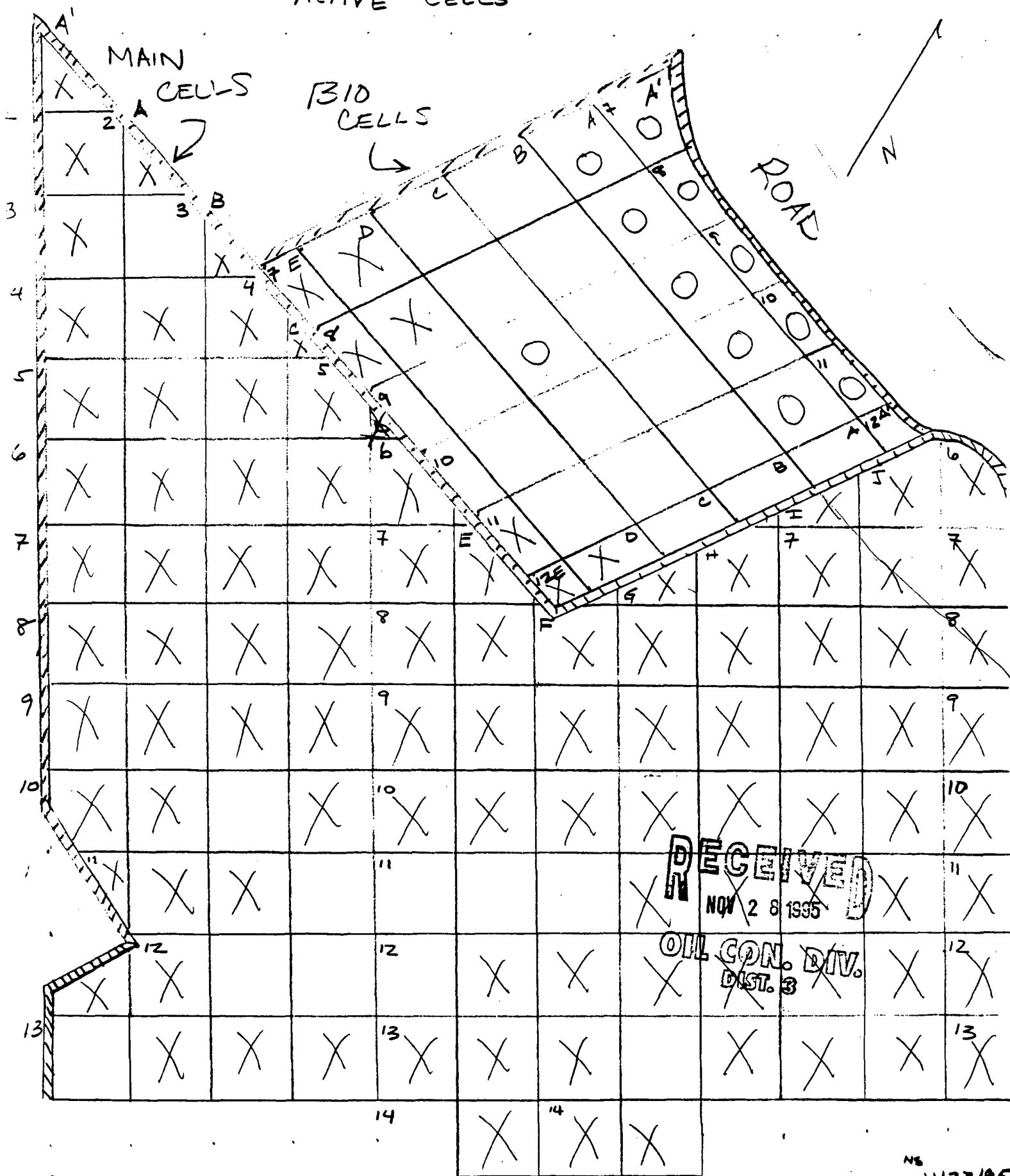
If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,


Martyne J. Kieling
Environmental Geologist

xc: OCD Aztec Office

ENVIROTECH INC. LANDFARM No. 1 ACTIVE CELLS



11/27/95

A B C D E F G H I J K



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

MEMORANDUM:

TO: Envirotech file

THRU: Coby Muckelroy, Inspect./Enf. Supervisor *CM*
Michael Le Scouarnec, Haz. Waste Inspector *ML*

FROM: Edward L. Horst, Program Manager *ELH*

SUBJECT: RESPONSE TO DECEMBER 3, 1993 MEMORANDUM ON ENVIROTECH

After reviewing Michael Le Scouarnec's MEMORANDUM of December 3, 1993, on his and John Tymkowych's visit to Envirotech. Mr. Young has made a statement that I authorized the burning of oil filters and the disposal of diesel contaminated dirt at his landfarm. These statements are not true, what was said to Mr. Young is that he could not burn oil filters, only facilities authorized to burn this type of material for energy recovery were allowed to do so. As to the disposal of diesel contaminated soils, under no circumstances would I authorize the disposal of any material on a permitted by another agency, i.e. OCD. I told Mr. Young that if this material was not hazardous waste as defined by HWMR-#7, than our bureau does not have authorization over the handling of or disposal of this material. I also contacted Mr. Roger Anderson, OCD, and informed him of Mr. Young's statement.

On December 4, 1993, I contacted Mr. Young and stated that his interpretation of my statements were incorrect and that I want a letter from him as to how he is to handle the oil filters and contaminated soils. I will then respond to his inquiry in writing so that he understands his responsibilities.



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 0845

Date 8/9/93

Originating Party

Vert Farnsworth - Envirotech

Other Parties

Bill Olson - Enviro. Bureau

Subject

Crude Spill

Discussion

Gary Rading Co. truck overturned, lost 40-50 bbls
crude, left side of hwy.

Spill located in sensitive area (ie, wash) want emergency authority
to pick up spils and temporarily store at Envirotech
landfarm while awaiting TCLP

Told him must have request from EP, Haz-waste that it
is immediate danger to public health & welfare, environment

Conclusions or Agreements

He will contact Ed Horst

Distribution

file Bloomfield Ref
Envirotech

Signed

Bill Olson

STATE OF
NEW MEXICO

OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

0930

Date

8/9/93

Originating Party

ELOY
ED. HW

Other Parties

R ANDERSON - OCD

Subject

Emergency transportation of crude oil spill

Discussion

ED. HW has authorized the transportation of contaminated soils at a crude oil tanker spill to Envirotech Landfill. The spill is approx 2mi So of the CB border on Hwy 84. The soils will be stored at Envirotech on plastic & covered pending TCLP analysis.

Conclusions or Agreements

Distribution

Bloomfield Ref file
Envirotech file

Signed

R Anderson

STATE OF
NEW MEXICO

OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time

Date

Originating Party

Other Parties

R. Anderson - OCD

M. Young - Enmuretech

Subject

Emergency transportation of crude oil spill

Discussion

Enmuretech is authorized to transport and store contaminated soils from a Gary Refining crude oil tanker spill on Hwy 84, 2 mi. E of the Colorado state line. The soils will be stored on plastic, covered and isolated pending TCEP analysis.

Conclusions or Agreements

Distribution

Bloomfield ref file
Enmuretech. File

Signed

R. Anderson



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

June 30, 1993

RECEIVED

JUL 06 1993

**OIL CONSERVATION DIV.
SANTA FE**

Roger Anderson, Chief
Environmental Bureau
Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

RE: Envirotech Landfarm #1

Dear Mr. Anderson:

The New Mexico Environment Department (NMED) has received the necessary documentation, in the form of copies of hazardous waste manifests, concerning the shipment from Envirotech, Inc.'s property of the paint related hazardous waste generated by Riley Industrial Services. Enclosed are copies of these manifests for your review. As a result of the removal of this material, and based on information currently available, the NMED no longer considers Envirotech, Inc. to be managing a RCRA hazardous waste storage/treatment facility. However, the NMED is currently negotiating a settlement agreement with Envirotech, Inc. over the compliance order (NMHWA 93-10) issued on May 26, 1993 relating to past activities by Envirotech, Inc.

If you have any questions or require additional information, please contact Mr. Coby Muckelroy or myself at (505) 827-4308.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward L. Horst".

Edward L. Horst
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau

ELH:CGM:cm

cc: Garth Graves, NMED District I Office
David Tomko, NMED Farmington Field Office



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. C18 No. 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <div style="border: 1px solid black; padding: 2px;">NMD161754296</div>		Manifest Document No. <div style="border: 1px solid black; padding: 2px;">173363</div>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
		3. Generator's Name and Mailing Address RILEY INDUSTRIAL SERVICES INC. 2615 SAN JUAN BLVD FARMINGTON, NM 87499				A. State Manifest Document Number <div style="border: 1px solid black; padding: 2px;">669261</div>							
4. Generator's Phone (505) 327-4947				B. State Generator's ID <div style="border: 1px solid black; padding: 2px;">99935</div>									
5. Transporter 1 Company Name SAFETY KLEEN CORP.				6. US EPA ID Number <div style="border: 1px solid black; padding: 2px;">ILD051060408</div>		C. State Transporter's ID <div style="border: 1px solid black; padding: 2px;">88888</div>							
7. Transporter 2 Company Name Coal City Co.				8. US EPA ID Number <div style="border: 1px solid black; padding: 2px;">FLD981195730</div>		D. Transporter's phone 505 884-2277							
9. Designated Facility Name and Site Address SAFETY KLEEN CORP. 1722 COOPER CREEK ROAD DENTON, TX 76208				10. US EPA ID Number <div style="border: 1px solid black; padding: 2px;">TXD077603371</div>		E. State Transporter's ID <div style="border: 1px solid black; padding: 2px;">41015</div>							
						F. Transporter's phone 214-627-3232							
						G. State Facility's ID <div style="border: 1px solid black; padding: 2px;">65124</div>							
						H. Facility's Phone <div style="border: 1px solid black; padding: 2px;">817-383-2611</div>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total		14. Unit		15. Waste No.	
						No. Type		Quantit		Wt/Vol			
a. <div style="border: 1px solid black; padding: 2px;">X</div> RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (F005)(ERG#26)						<div style="border: 1px solid black; padding: 2px;">38</div> DM		<div style="border: 1px solid black; padding: 2px;">35721</div>		<div style="border: 1px solid black; padding: 2px;">P</div>		<div style="border: 1px solid black; padding: 2px;">OUTS209H</div>	
b. <div style="border: 1px solid black; padding: 2px;"></div>						<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>	
c. <div style="border: 1px solid black; padding: 2px;"></div>						<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>	
d. <div style="border: 1px solid black; padding: 2px;"></div>						<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>		<div style="border: 1px solid black; padding: 2px;"></div>	
J. Additional Descriptions for Materials Listed Above F005 D035 F003 D007 D008						K. Handling Codes for Wastes Listed Above S01/S02/T50 m141 m043							
15. Special Handling Instructions and Additional Information CONTROL# 0171758-6 SAMPLE# 278752 EMERGENCY RESP# 708-888-4660 24 HR						9320 7-008-01-9110 SKDOT# A: 0001154							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.										<p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>			
Printed/Typed Name <div style="border: 1px solid black; padding: 2px;">Allen Riley</div>						Signature <div style="border: 1px solid black; padding: 2px;">Allen Riley</div>				Date <div style="border: 1px solid black; padding: 2px;">5/18/93</div>			
17. Transporter 1 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name <div style="border: 1px solid black; padding: 2px;">Greg Beaul</div>						Signature <div style="border: 1px solid black; padding: 2px;">Greg Beaul</div>				Date <div style="border: 1px solid black; padding: 2px;">5/18/93</div>			
18. Transporter 2 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name <div style="border: 1px solid black; padding: 2px;">Helen H. Rice</div>						Signature <div style="border: 1px solid black; padding: 2px;">Helen H. Rice</div>				Date <div style="border: 1px solid black; padding: 2px;">5/18/93</div>			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name <div style="border: 1px solid black; padding: 2px;">Fern Whitlock</div>						Signature <div style="border: 1px solid black; padding: 2px;">Fern Whitlock</div>				Date <div style="border: 1px solid black; padding: 2px;">5/19/93</div>			



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NMD161754296	Manifest Document No. 73303 69262 FW	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address RILEY INDUSTRIAL SERVICES INC. 2615 SAN JUAN BLVD FARMINGTON, NM 87499				A. State Manifest Document Number 669262	
4. Generator's Phone (505) 327-4947				B. State Generator's ID 99935	
5. Transporter 1 Company Name SAFETY KLEEN CORP.		6. US EPA ID Number ILD051060408		C. State Transporter's ID 88888	
7. Transporter 2 Company Name Local City COB		8. US EPA ID Number LEL0981095720		D. Transporter's Phone 505 884-2277	
9. Designated Facility Name and Site Address SAFETY KLEEN CORP 1722 COOPER CREEK ROAD DENTON, TX 76208		10. US EPA ID Number TXD077603371		E. State Transporter's ID 41015	
				F. Transporter's Phone 214-627-3432	
				G. State Facility's ID 65124	
				H. Facility's Phone 817-383-2611	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
a. HM X RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (F005)(ERG#26)		39 DM		36699	P
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above F005 D035 F003 D007 D008				K. Handling Codes for Wastes Listed Above S01/S02/T50 M141 M043	
15. Special Handling Instructions and Additional Information CONTROL # 0171758-6 SAMPLE # 278752 EMERGENCY RESP# 708-888-4660 24 HR				9320 7-008-01-9110 SKDOT# A: 0001154	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Glen Beall		Signature Glen Beall		Date Month Day Year 5 18 93	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Greg Beall		Signature Greg Beall		Date Month Day Year 5 18 93	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Don Balentine		Signature Don Balentine		Date Month Day Year 5 18 93	
19. Discrepancy Indication Space Changed manifest document no. in section 1 FW 5/21					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Fern Whitlock					
		Signature Fern Whitlock		Date Month Day Year 5 19 93	



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RILEY INDUSTRIAL 2615 SAN JUAN BLVD. FARMINGTON, NM 87499		4. Generator's Phone (505) 327-4947	5. Transporter 1 Company Name SAFETY-KLEEN CORP.	6. US EPA ID Number ILD 051060408	A. State Manifest Document Number 592316	
7. Transporter 2 Company Name		8. US EPA ID Number	9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 1722 COOPER CREEK ROAD DENTON, TX 76208		B. State Generator's ID 9995	
10. US EPA ID Number TXD077603371		11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		C. State Transporter's ID 88888		
12. Containers		13. Total Quantity		D. Transporter's Phone 505 884-2277		
14. Unit Wt/Vol		15. Waste No.		E. State Transporter's ID		
a. X RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG II (FO05) (ERG#26)		4 DM 2420 P		F. Transporter's Phone		
b. X RQ HAZARDOUS WASTE, LIQUID, N.O.S. 9 NA3082 PG III (D008) (ERG#31)		1 DM 660 P		G. State Facility's ID 65124		
c. X COMBUSTIBLE LIQUID, N.O.S. (OIL) NA1993 PG III (ERG#27)		1 DM 110 P		H. Facility's Phone 817-383-2611		
d. (NOT USEPA HAZARDOUS WASTE)						
J. Additional Descriptions for Materials Listed Above A) FO05 D001 D035 B) D008 C) None		K. Handling Codes for Wastes Listed Above A) S01/S02/T50 B) S01/S02/T50 C) S01/S02/T50				
15. Special Handling Instructions and Additional Information CUSTOMER NUMBER 7-008-01-9110 CONTROL # A) 0168838-2 B) 0168523-3 C) 0168563-7 EMERGENCY RESP# 708-888-4660 24 HR. SAMPLE # A) 278765 B) 278766 C) 278768 SK-DOT # A: 0001167 B: 0000888 C: 000077						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Sonny Riley		Signature Sonny Riley		Date 3 25 93		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ron Stephenson		Signature Ron Stephenson		Date 3 25 93		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space Added State Gen. ID. on B 4 1/2 Ven.						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Dionisia Munoz		Signature Dionisia Munoz		Date 4 1 93		



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address RILEY INDUSTRIAL 2615 SAN JUAN BLVD. FARMINGTON, NM 87499 (505) 327-4947		4. Generator's Phone		A. State Manifest Document Number 593830	
5. Transporter 1 Company Name SAFETY-KLEEN CORP.		6. US EPA ID Number ILD 051060408		B. State Generator's ID 99935	
7. Transporter 2 Company Name Coal City Corp		8. US EPA ID Number IL 0981195720		C. State Transporter's ID 40823	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 0-006-18 1722 COOPER CREEK ROAD DENTON, TX 76208		10. US EPA ID Number TXD 077603371		D. Transporter's Phone 05 884-2277	
				E. State Transporter's ID 41011	
				F. Transporter's Phone (214) 427-3232	
				G. State Facility's ID 65124	
				H. Facility's Phone 817-383-2611	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. <input checked="" type="checkbox"/> RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE) 3 UN1993 PG III (FO05) (ERG#27)		No. Type			OUTS203H
b. <input checked="" type="checkbox"/> RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (FO05) (ERG#26)		5 DM	5500P		OUTS209H
c. <input checked="" type="checkbox"/> RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG III (FO05) (ERG#26)		1 DM	503 P		OUTS209H
d. <input type="checkbox"/>					
J. Additional Descriptions for Materials Listed Above A) FO05 D035 D007 DB B) FO05 D035 FO03 D007 D008 C) FO05 D035 FO03 D007 D008		K. Handling Codes for Wastes Listed Above A) S01/S02/T50 DB M141 M043 M141 M061			
15. Special Handling Instructions and Additional Information CUSTOMER #7-008-01-9110 C#0168838-2 SHJ28765 CONTROL #0168555-1 A) SAMPLE # 278767 A) SK-DOT #A) 0001154 0171758-6 B) 278752 B) B) 0003021					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name X Russell Turner		Signature X Russell Turner		Date 6/1/93	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Greg Beall		Date 6/1/93	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature Don Balentine		Date 6/2/93	
19. Discrepancy Indication Space HA: NOT USED JA: NOT USED KA: NOT USED Called branch delete D007 + D008 from section 9.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name RANDALL ANDERSON		Signature Randall Anderson		Date 6/2/93	

EPA WASTE CLASSIFICATION

O & G EXPLORATION AND PRODUCTION WASTES*

Oil and Natural Gas Exploration and Production Materials and Wastes Exempted by EPA from Consideration as "Hazardous Wastes" (provided non-exempt waste which is or may be "hazardous" has not been added):

- Produced water;
- Drilling fluids;
- Drill cuttings;
- Rigwash;
- Drilling fluids and cuttings from offshore operations disposed of onshore;
- Geothermal production fluids;
- Hydrogen sulfide abatement wastes from geothermal energy production;
- Well completion, treatment, and stimulation fluids;
- Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste;
- Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments;
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes;
- Workover wastes;
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves;
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge;
- Cooling tower blowdown;

- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste steam);
- Packing fluids;
- Produced sand;
- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation;
- Hydrocarbon-bearing soil;
- Pigging wastes from gathering lines;
- Wastes from subsurface gas storage and retrieval, except for nonexempt wastes listed below;
- Constituents removed from produced water before it is injected or otherwise disposed of;
- Liquid hydrocarbons removed from the production stream but not from oil refining;
- Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons;
- Materials ejected from a producing well during the process known as blowdown;
- Waste crude oil from primary field operations and production;
- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment;
- Liquid and solid wastes generated by crude oil and crude tank bottom reclaimers***.*

Materials and Wastes Not Exempted (may be a "hazardous waste" if tests or EPA listing define as "hazardous") **:

- Unused fracturing fluids or acids;
- Gas plant cooling tower cleaning wastes;
- Painting wastes;
- Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids;
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste;
- Refinery wastes;
- Liquid and solid wastes generated by refined oil and product tank bottom reclaimers***;*
- Used equipment lubrication oils;
- Waste compressor oil, filters, and blowdown;
- Used hydraulic fluids;
- Waste solvents;
- Waste in transportation pipeline-related pits;
- Caustic or acid cleaners;
- Boiler cleaning wastes;
- Boiler refractory bricks;
- Boiler scrubber fluids, sludges, and ash;
- Incinerator ash;
- Laboratory wastes;
- Sanitary wastes;
- Pesticide wastes;
- Radioactive tracer wastes;
- Drums, insulation, and miscellaneous solids.

* Source: Federal Register, Wednesday, July 6, 1988, p.25,446 - 25,459.

** See important note on 1990 disposal restrictions for non-exempt waste on reverse.

*** See reverse side for explanation of oil and tank bottom reclaimer listings.

NOTES:

1. As of September 25, 1990, any facility disposing of 1.1 tons or more of non-exempt waste per month with benzene as a constituent (e.g. oily liquid or solids, or aromatic wastes) is disposing of hazardous waste if, after testing, benzene levels of liquids, and of liquid leachate from solids are above 0.5 milligrams per liter (equivalent to 500 parts per billion). Benzene is a naturally occurring constituent of crude oil and refined product (especially gasoline), and is also used as a cleaning solvent. (Other types of solvents and chemicals have been subject to hazardous waste rules for several years.)

As of March 29, 1991, facilities disposing of between 0.11 and 1.1 tons of non-exempt waste per month became subject to the same rules. Regulation of such facilities is the responsibility of either the US Environmental Protection Agency or the New Mexico Environment Department (dependent on jurisdiction transfer from USEPA).

The following OCD regulated facilities, especially, may be subject to hazardous waste rules for disposal of wastes and contaminated soils containing benzene:

- Oil and gas service companies having wastes such as vacuum truck, tank, and drum rinseate from trucks, tanks and drums transporting or containing non-exempt waste.
- Crude oil treating plants and crude tank bottom reclaimers using benzene solvent, or liquids containing benzene as cleaning solutions.
- Transportation pipelines and mainline compressor stations generating waste, including waste deposited in transportation pipeline-related pits.

Source: Federal Register, Thursday, March 29, 1990, p.11,798 - 11,877.

2. In April, 1991, EPA clarified the status of oil and tank bottom reclamation facilities:
 - A. Those wastes that are derived from the processing by reclaimers of only exempt wastes from primary oil and gas field operations are also exempt from the hazardous waste requirements. For example, wastes generated from the process of recovering crude oil from tank bottoms are exempt because the crude storage tanks are exempt.
 - B. Those reclaimer wastes derived from non-exempt wastes (eg. reclamation of used motor oil, refined product tank bottoms), or that otherwise contain material which are not uniquely associated with or intrinsic to primary exploration and production field operations would not be exempt. An example of such non-exempt wastes would be waste solvent generated from the solvent cleaning of tank trucks that are used to transport oil field tank bottoms. The use of solvent is neither unique nor intrinsic to the production of crude oil.

Source: EPA Office of Solid Waste and Emergency Response letter opinion dated April 2, 1991, signed by Don R. Clay, Assistant Administrator.



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

RECEIVED
JUN 22 AM 11:20

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

MEMORANDUM:

TO: File

THRU: Edward Horst, RCRA Program Manager
Coby Muckelroy, Insp. / Enf. Supervisor

FROM: Michael Le Scouarnec, Haz. Waste Inspector

DATE: March 18, 1993

RE: Hazardous Waste Shipment at Envirotech, Bloomfield

On March 3, 1993, Coby Muckelroy and Michael Le Scouarnec from HRMB met Kathy Brown from OCD at Envirotech located at 5796 U.S. Hwy 64-3014 Farmington, NM 87401; (505)632-1865.

The purpose of this meeting with the owner of Envirotech, Mr. Morris Young, was to gather information regarding a shipment of dried paint waste from Riley Industrial Services. The waste was contained into twenty-three 55 gallon drums and was shipped from Riley Industrial Services in Farmington to Envirotech's landfarm #1, south of Bloomfield.

The OCD Field Office representant, Mr. Denis Faust, granted the shipment after apparently evaluating the waste analysis of burned paint wastes. The Benzene parameter on the lab result was peaking up to 36 ppm. HRMB does not know why Mr. Faust granted the disposal of the waste to landfarming. Mr. Young had in his possession the lab result and also did not prevent the waste from being accepted at the landfarm. The OCD permit disallows acceptance of a hazardous waste.

The 3 inspectors accompanied by Mr. Young, Mr. Glen Riley, and Mr. Beall & Mr. Guyer from Safety-Kleen visited landfarm #1 in the afternoon at about 2:15. (see pictures)

The facility had already mixed virgin dirt with the waste. The dirt pile in the pictures, is a mixture of three dirt volume for one waste volume. The pile was contained on a plastic liner. Mr. Beall from S-K took a grab sample prior to ship the waste to a TSD.

OCD sent a letter to Mr. Young telling him that he has to stop all operation in all the landfarm for a certain period of time. (see attachment)

I met Roger Anderson from OCD on March 17, 1993, and he told me that OCD gave permission to Envirotech to open landfarm #2.

HRMB enforcement actions are still pending.



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

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

March 8, 1993

Mr. William Olsen
State of New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Sante Fe, New Mexico 87504

Dear Mr. Olsen,

Envirotech Inc. requests authorization to temporarily hold exempt soils from area producers at an area south of and physically separated from either of Envirotech's permitted landfarm facilities.

The site is on private property owned personally by Morris D. Young. It is south of the access road to Landfarm #2. This parcel is a portion of a ranch I have purchased in Section 6 T26N R10W, San Juan County, New Mexico.

We request this fenced and bermed area be used for temporary storage of exempt oil field clean-up contaminated soils. The material will be held on plastic until the Division has a chance to thoroughly review the status of the permitted landfarm facilities. Each material will be certified by the operator as exempt waste prior to our request to NMOCD to receive and hold these soils on a case by case basis.

Specifically we request authorization to temporary hold contaminated soil El Paso is excavating from the Conoco Gas Plant in Bloomfield and from several field production pits El Paso is closing. Meridian also requests we temporarily hold solids from the McGraff injection well facility. We have previously received Certificate of Waste Status certifying the exempt classification of the McGraff material. If NMOCD desires, we will secure a new certificate for this specific material.

To summarize our previous conversation, Envirotech Inc. will not enter either facility except to take out our large equipment parked in the parking area of Landfarm No. 2.

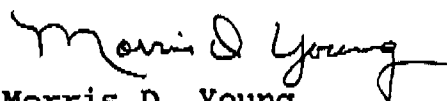
If NMOCD desires, we will reestablish the fence separating the holding area that adjoins Landfarm No. 1. Although this holding area is outside our permitted landfarm boundaries, the interior fence separating them was damaged numerous times by movement of heavy equipment and large trucks when placing the soil in the holding area.

NMOCD
Envirotech Inc.
March 8, 1993

Page 2

As always, we appreciate your efforts and pledge 100% cooperation with the NMOCD.

Sincerely,

A handwritten signature in cursive script that reads "Morris D. Young".

Morris D. Young
President
MDY/cj08

CC: NMOCD - Frank Chavez



BRUCE KING
GOVERNOR

STATE OF NEW MEXICO

ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE

ANITA LOCKWOOD
CABINET SECRETARY

1000 RIO BRAZOS ROAD
AZTEC, NEW MEXICO 87410
(505) 334-6178

FAX TRANSMITTAL SHEET

DATE: 3/5/93

TO: Bob Storg
OCD
Santa Fe

FROM: Denny Foust

FAX: 505-334-6170

COMMENTS: Verl Farnsworth is 2nd
in command Vice-President

NUMBER OF PAGES INCLUDING COVER: 2



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ PersonalTime
3:00Date
3/1/93Originating Party

Ed Horst

Other Parties

Kathy Brown

NMED - Haz Waste

Subject

Envirotech Landfarm

- Acceptance of Hazardous Waste

Discussion

Have letter from Morris to Rider Industrial Service saying Envirotech has OCD authorization from Denny Foust for acceptance of contaminated soils. Analyses shows the constituents are above the ~~level~~ regulatory levels for at least several different constituents.

Conclusions or Agreements

Called Denny and asked him to check his records. He checked and said he did have record of authorization. Asked him to FAX it.

Will need to meet with Haz Waste ASAP

Conclusion

File-Envirotech

Signed

Kathy Brown



BRUCE KING
GOVERNOR

State of New Mexico

ENVIRONMENT DEPARTMENT

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

92 JUN 25 AM 4 26
CONSERVATION DIVISION
RECEIVED

June 23, 1992

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

RE: NOI

Dear Mr. Young:

This letter is in response to your Notice of Intent (NOI) dated June 4, 1992 concerning your soil remediation facility located in Section 26, T27N, R11W San Juan County. I have contacted Roger Anderson of the Oil Conservation Division (OCD) and he informed me that their permit for your Farmington facility also addresses ground water protection.

Therefore, you will not need to duplicate ground water protection through a discharge plan from the New Mexico Environment Department (NMED).

Sincerely,

Richard Ohrbom
Water Resource Specialist
Ground Water Section

cc: Garth Graves, NMED District I Manager
Ernest Rebuck, PM, GWS
Dave Tomko, HPM, NMED Farmington
~~Roger Anderson~~, OCD, Santa Fe

ENVIROTECH INC.

~~VI CONSER~~ UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

5796 U.S. HIGHWAY 64 - 3014

FARMINGTON, NEW MEXICO 87401 92 JUL 28 AM 8 51

PHONE: (505) 632-0615

July 24, 1992

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
P.O. Box 2088
Sante Fe, New Mexico 87504

Dear Mr. Anderson:

Mr. Derin Warren, Environmental Engineer with Meridian Oil, Inc. is trying to consolidate their documentation of site remediation, and E and P waste disposal.

As per OCD directions we have required a certificate of exempt waste accompany all E and P wastes accepted at Envirotech's Soil Remediation Facility. Mr. Warren has submitted the attached form to determine if, when properly filled out and signed, would fulfill the certification of waste status in addition to fulfilling their additional internal documentation requirements.

In addition to the attached form, Envirotech will still require a Bill of Lading for all shipments received.

Please review this for and advise as to its appropriateness.

Sincerely,

Morris D. Young C.J.

Morris D. Young
President

MDY/cj

Envirotech Exempt Waste Manifest**Meridian Oil Inc.**

PO Box 4289, Farmington, NM 87499

**Safety and
Environmental**

1. Waste Location: Lease/Well No. _____

2. Volume: _____ Cubic Yards _____ Barrels _____ Gallons
3. Description of Waste: _____

4. Method of Waste Generation: _____

5. Disposal Cost: _____
6. This waste material complies with the definition of exempt waste as listed in 40 CFR 261.4.

Approval for Disposal _____ Date _____
(signature)**MOI
Representative**

Transportation Company: _____

Date(s) Transported: _____

MOI Representative on Site _____ Date _____
(signature)**Envirotech**
Complete and
return to
Meridian
Safety and
Environmental
with Invoice.

Date(s) Received: _____

Total Volume Received: _____

Waste Location : Cell/Grid No. _____

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

April 22, 1992

OIL CONSERVATION DIVISION
RECEIVED
'92 APR 27 AM 9 28

Mr. Denny Foust
Environmental Compliance Inspector
New Mexico State Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

RE: Soil Remediation Facility

Dear Mr. Foust:

As Envirotech Inc., has gained experience operating our Soil Remediation facility at Hilltop, New Mexico, we have experienced changes of operation from the mode originally anticipated.

Much of the contaminated soil we are authorized to receive is from areas near water courses. The soil is moist and contains high percentage of rocks ranging up to 18 inches diameter. Originally, soils were thin spread upon receipt, but we found that the rocks would prevent us from working with soil to provide good aeration and it was also destructive to our equipment. Consequently, we purchased a power screen and have been removing all rock 3/8 inch and greater in diameter.

The power screening process also accelerates the oxidation and remediation of the soils by providing intimate contact to all soils by separating it into fine granular material prior to placement on the Soil Remediation Site.

Moist soil received has to be held for up to 2-3 weeks to allow it to dry sufficiently for screening. We have designated an area in the Soil Remediation Facility near the entrance gate as the holding area.

Maps are made of each soil receipt and piles are physically flagged to keep each soil receipt separate until properly processed and placed. Processed soils are placed in 100'X 100' grids until the proper volume is received and then spread. Normal procedure is to spread soils in less than 24 hours after processing.

We have also constructed a separate fenced and locked area, outside of the Soil Remediation Facility, where we can stabilize material that appears to have entrained free liquids. After stabilization, and authorization from the NMOCD, the materials are received for

Page 2
April 22, 1992
Mr. Foust

remediation. This separate secured area is also used to hold materials until characterization by analysis is completed and sent to your attention for authorization to receive such materials.

This secure area is separated from the Soil Remediation Facility. There is no common gate between the Remediation Facility and the Stabilization Area.

The above described operating mode allows for orderly receipt and processing of contaminated soils in accordance with our permit criteria.

We appreciate working with you on this matter. If we can provide any additional information, or in any way be helpful, please contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Morris D. Young".

Morris D. Young
President

CC: Roger Anderson, NMOCD

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

January 5, 1992

RECEIVED

JAN - 6 1993

**OIL CON. DIV.,
DIST. 3**

Mr. Denny Foust
State of New Mexico Oil Conservation Division
1000 Rio Brazos Rd.
Aztec, New Mexico 87410

Re: Request to Receive
Riley Industrial Service
Contaminated Soils
TCLP Analysis

Project No. 92250

Dear Mr. Foust:

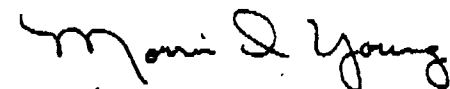
Envirotech Inc. request authorization to receive soil resulting painting oilfield equipment and other equipment at their Farmington New Mexico yard. The solids contain no free liquid as defined by the OCD's Paint Filter Test.

A TCLP Analysis was performed on the solids to determine if they could be accepted at Envirotech's Soil Remediation Facility. No pesticide or herbicide analysis was preformed in-as-much as there is no reason to believe they could be present.

The attached laboratory analysis show that the concentration of the TCLP target constituents are all below the RCRA regulatory levels for hazardous waste. Therefore, the soils are classified as non-hazardous per RCRA (40CFR 261). - wmg - Benzene

Than you for your assistance in this matter, if you have any questions please contact us.

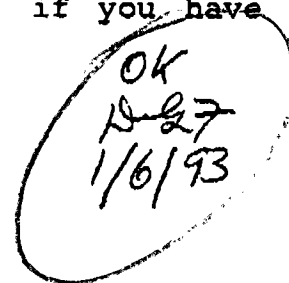
Respectfully submitted,
Envirotech Inc.

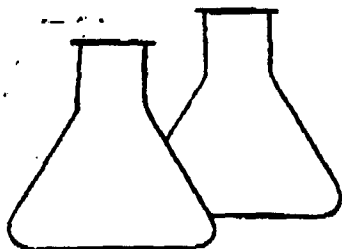


Morris D. Young
President

cc: Sonny Riley, Riley Industrial Service

MDY/cj169





ENVIROTECH LABS

5796 US HIGHWAY 64-3014 • FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615 • FAX: (505) 632-1865

RECEIVED

JAN - 81993

OIL CON. DIV.
DIST. 3

EPA METHODS 8010/8020
AROMATIC VOLATILE ORGANICS/HALOGENATED VOLATILE ORGANICS

Client:	Riley Industrial	Project #:	92258
Sample ID:	Composite	Date Reported:	12-23-92
Laboratory Number:	3711	Date Sampled:	12-11-92
Sample Matrix:	Solids	Date Received:	12-11-92
Preservative:	Cool	Date Extracted:	12-17-92
Condition:	Cool and Intact	Date Analyzed:	12-22-92
		Analysis Requested:	TCLP

Parameter	Concentration (mg/L)	Det Limit (mg/L)	Regulatory Limits (mg/L)
Vinyl Chloride	0.02	0.005	0.2
1,1-Dichloroethene	0.08	0.006	0.7
Benzene	36.4	0.006	0.5
Chloroform	0.07	0.010	0.5
1,2-Dichloroethene	ND	0.005	0.5
2-Butanone	ND	0.005	200
Carbon Tetrachloride	ND	0.006	0.5
Trichloroethene	0.03	0.005	0.5
Tetrachloroethene	0.06	0.006	0.7
Chlorobenzene	ND	0.005	100
1,4-Dichlorobenzene	0.15	0.005	7.5

SURROGATE RECOVERIES:

Parameter	Percent Recovery
Trifluorotoluene	85 %
Bromfluorobenzene	95 %

Method: Method 1311, Toxicity Characteristic Leaching Procedure
Test Methods for Evaluating Solid Waste, SW-846, USEPA,
Sept. 1986

Method 5030, Purge-and-Trap, Test Methods for Evaluating
Solid Waste, SW-846, USEPA, Sept. 1986

Method 8010, Halogenated Volatile Organics, Test Methods
for Evaluating Solid Waste, SW-846, USEPA, Sept. 1986

Method 8020, Aromatic Volatile Organics, Test Methods for
Evaluating Solid Waste, SW-846, USEPA, Sept. 1986

Regulatory Limits based on 40 CFR part 261 subpart C
section 261.24, July 1, 1990

ND - Parameter not detected at the stated detection limit.

Comments: Riley Industrial Service, Riley Yard

Shirley L. Ginner
Analyst

Marie D. Young
Review



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

BRUCE KING
GOVERNOR

August 6, 1991

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

CERTIFIED MAIL -
RETURN RECEIPT NO. P-756-666-895

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

RE: Bioremediation Test
Envirotech Soil Remediation Facility
San Juan County, New Mexico

Dear Mr. Young:

The Oil Conservation Division (OCD) has received your request to initiate a test bioremediation cell within the boundaries of your previously approved Soil Remediation facility.

Based on the information provided in your request, the test bioremediation cell is approved. The test cell is authorized for a period of one year at which time an evaluation report will be submitted to the OCD. If an area larger than the test cell is to be used for bioremediation or if bioremediation is to continue after the one year authorization, a modification to your existing permit must be applied for.

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

Sincerely,

A handwritten signature in cursive script that reads "Roger C. Anderson".

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Aztec Office

ENVIROTECH INC.

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

OIL CONSERVATION DIVISION
UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
REC'D

'91 AUG 5 AM 9 16

July 26, 1991

Mr. Roger C. Anderson
Environmental Engineer
State of New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Re: Bioremediation Test at Envirotech's Soil Remediation Site,
San Juan County, New Mexico

Dear Mr. Anderson:

Envirotech Inc. requests authorization to install and operate a bioremediation cell at our San Juan County Soil Remediation Site. The bioremediation cell would be located within the confines of the present Remediation Site Enclosure as is shown on the attached Site Plan.

The anticipated bioremediation cell will be located in an area that is bermed to prevent any material from leaving the confines of the cell. We anticipate the cell to be 250 feet wide by 500 feet long.

Although we are experiencing relatively good degradation of the hydrocarbons in the received soils at the site, we feel that by managing the soil moisture, and with nutrient addition, the observed rates of degradation of the higher molecular weight hydrocarbons can be significantly enhanced.

Specifically, we propose to berm off this test cell, sprinkle fresh water on the soils within the cell to maintain the moisture content at approximately 20 to 30 % of the soils holding capacity and experiment with various levels of nitrogen and phosphate fertilizer additions to optimize the natural bioremediation process.

The schedule for tilling the soil will be advanced to once a week instead of the present bi-weekly schedule. As determined we may elect to till twice weekly to increase oxygenation of the soil.

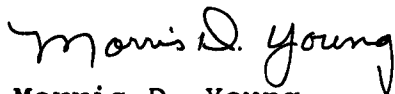
Page 2
July 26, 1991
Mr. Anderson

The soils will be sampled monthly as per SW-846 protocol for TPH content, as well as, any specific compound that we may be interested in tracking. These test results will be available to OCD.

On a quarterly basis we will auger the soil to a depth of approximately three (3) feet at two (2) different locations to monitor for leaching of the hydrocarbon into the underlying soils. The analytical results will be forwarded to the attention of the OCD upon their availability.

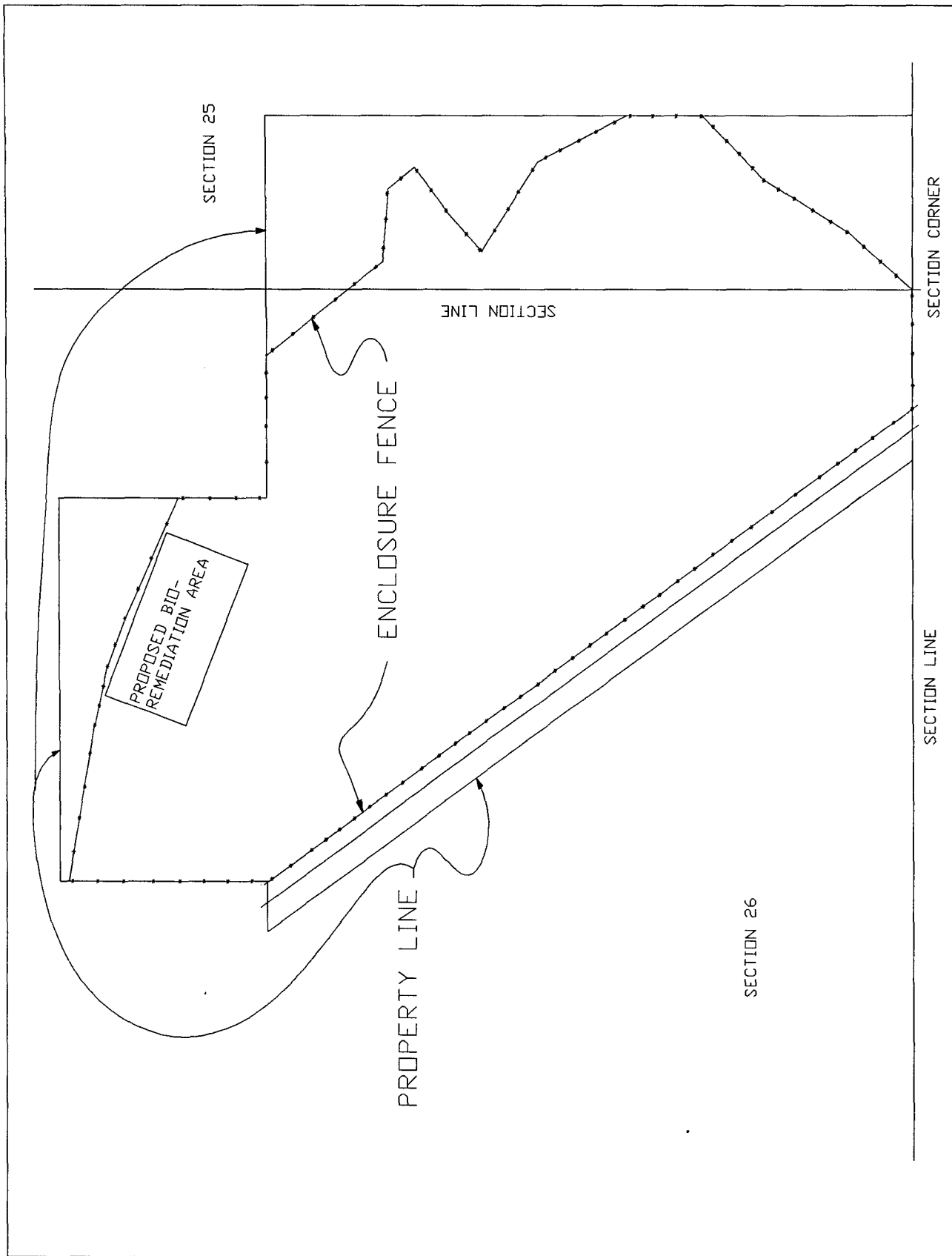
We look forward to working with the OCD on this test cell, and request approval to proceed as soon as possible.

Sincerely,



Morris D. Young
President

doc:105ocd



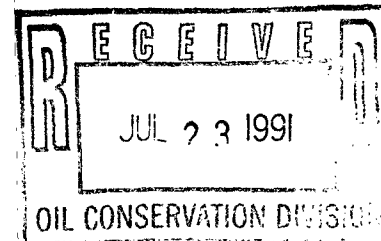
<p>ENVIROTECH INC. SOIL REMEDATION SITE BIOREMEDIATION TEST CELL AREA</p>	<p>ENVIROTECH INC. ENVIRONMENTAL SCIENTISTS 5796 U.S. HIGHWAY 64-3014 FARMINGTON, NEW MEXICO 87401</p>	<p>SITE PLAN</p>
---	--	----------------------



Department of Energy

Western Area Power Administration
P.O. Box 11606
Salt Lake City, UT 84147-0606

JUL 17 1991



Mr. Mike Space
New Mexico Environment Department
4131 Montgomery Boulevard, NE
Albuquerque, NM 87109

Dear Mr. Space:

The following information concerning the oil spills at Shiprock and Waterflow Substations and our proposed method of cleanup and disposal are provided in accordance with your request. The substations are located in San Juan County approximately 3 and 4 miles, respectively, north of Highway 550 and Waterflow, New Mexico. The oil spills occurred at Shiprock Substation during the week of September 10, 1990, and at Waterflow Substation during the week of June 11, 1990. The spill at Shiprock Substation involved approximately 60 gallons of transformer oil over approximately 200 square feet. The spill at Waterflow Substation involved approximately 20 gallons of transformer oil over approximately 120 square feet.

The oil from both spills is from two new electrical transformers that do not contain any polychlorinated biphenyls (PCB) according to the manufacturer's certification. The oil was absorbed by the soil in the substation yards and did not run off or leave the confines of the facilities. The depth of penetration by the oil is estimated to be about 1 to 1-1/2 feet. The spills occurred in either a new facility (Waterflow Substation) or a new section of an existing facility (Shiprock Substation); therefore, neither site should contain any previous contamination. Neither spill has contaminated ground or surface waters nor do they present immediate threats of contamination to ground or surface waters. There are no surface waters near either facility and the ground-water depth in the area is greater than 60 feet.

Western will provide Toxic Characteristic Leachate Procedure (TCLP) and PCB test results for the oil-stained soil. Should these tests prove negative, then all visible remains of the oil-stained soil will be removed and sent to Envirotech Inc.'s (Envirotech) soil remediation site at Hilltop, New Mexico, approximately 12 miles south of Bloomfield, New Mexico, (Envirotech, Inc., 5796 U.S. Highway 64-3014, Farmington, New Mexico 87401). Prior to Envirotech's acceptance of the soil, the soil test results will have to show that there are no toxic or hazardous substances in the soil and be acceptable to the New Mexico Oil Conservation Division (Mr. Roger Anderson, [505] 827-5884) which regulates the Envirotech operation. Should the test results show the existence of toxic or hazardous substances, then the soil will be disposed of according to pertinent Federal and state regulations. Western will notify you of the test results as soon as they become available and will provide documentation of the final disposition of the soil.

Please let us know if you concur with this disposal plan. If there are any questions, please telephone me at (801) 524-5392 or Gene Iley at (801) 524-5656.

Thank you for your assistance.

Sincerely,

S. Clayton Palmer

Dave Sabo
Manager, Environmental
and Public Affairs

cc:
Mr. Roger Anderson
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 • 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

June 17, 1991

Mr. Roger Anderson
Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

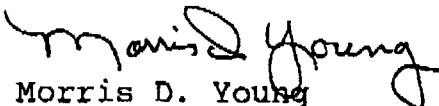
RE: Discharge Plan GW-55
Thriftway Bloomfield Refinery
Site Contamination Investigation

Dear Mr. Anderson:

Pursuant to Oil Conservation Division approval of Thriftway's Discharge Plan GW-55, site investigation work started at the Thriftway's Bloomfield Refinery on June 14, 1991.

We appreciate working with you on this project.

Sincerely,


Morris D. Young
President

MDY/tjg

582.doc

ENVIROTECH INC.

OIL CONSERVATION DIVISION
RECEIVED

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

June 11, 1991

Mr. Roger Anderson
Environmental Engineer
State of New Mexico Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: GWDP GW-55 Petroleum Storage Tank Testing
Thriftway Bloomfield, New Mexico, Refinery
Project #91825

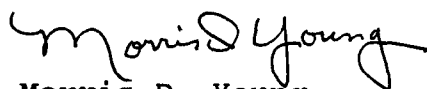
Dear Mr. Anderson

Enclosed please find a copy of the inspection report for Thriftway Refinery Tank No. 13 as required by GW-55

We have scheduled one tank per month for inspection. The next tank report will be forwarded to your attention prior to July 31, 1991.

We appreciate working with you on this matter.

Sincerely,



Morris D. Young
President

MDY/tjg

558.doc

Enclosures

c: Mr. Jim Ratcliff, Thriftway Marketing
Mr. R.J. Dalley, Thriftway Marketing
Mr. Ken Sinks, Thriftway Marketing

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 1610	Date 6/14/91
Originating Party	Other Parties	
Bill Olson - OCD Santa Fe	MAPCO Transportation - Four Corners Office Bloomfield (505) 334-6114	

Subject

MAPCO Pipeline by Envirotech Landfarm

Discussion

Contacted MAPCO to inform that OCD has a report in from Engineer at Gas Co. that Envirotech is doing earth work directly over the MAPCO pipeline adjacent to the Landfarm

Conclusions or Agreements

They will check out immediately

Distribution

Envirotech file

Signed

Bill Olson

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

1600

Date

6/14/91

Originating Party

Other Parties

Charles Ghoulson - OCD Aeta

Bill Olson - OCD Santa Fe

Subject

Envirotech Coniform

Discussion

Charlie said Envirotech doing dirt work for expansion down by highway.

He got a call from an engineer with Gas Co. at N.M. who said the earth work is clear at Gas Co's line but is directly over the MAPCO 16" line east of the Gas Co. line

Conclusions or Agreements

I will call MAPCO to inform them
Roger will call Envirotech to tell them to
stay out of pipeline right of way

Distribution

Signed

Bill Olson

Envirotech file

ENVIROTECH INC.

OIL CONSERVATION DIVISION

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014 '91 JUN 4 AM 8 57
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

May 29, 1991

Mr. Roger Anderson, Environmental Engineer
Oil Conservation Division
Energy, Minerals and Natural Resources
PO Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

RE: Expansion of Envirotech's Soil Remediation Site

Dear Mr. Anderson:

Envirotech requested authorization on February 11, 1991 to expand our Soil Remediation Site to include an additional 68 acres adjoining our currently operated 15 acres site at Hilltop, New Mexico.

Publication of our intent to expand was made on March 29, 1991 with the 30 days for public comment concluding April 29, 1991.

The two nearby property owners, Mr. Brad Mayfield, of Memphis Tennessee, and the United States Department of the Interior, Bureau of Land Management were both notified in writing of Envirotech's expansion intent on March 14, 1991. Unfortunately our correspondence to Mr. Mayfield and the BLM was sent regular mail rather than Certified Mail, Return Receipt. When the question came up as to receipt of notice for each of the referenced parties, we tried to contact each by phone to secure a letter stating they had in fact received our March 14, 1991 correspondence.

As per the attached letter over the signature of Mr. Ron Fellows, the BLM acknowledged receipt. We have been unable to get any response from Mr. Mayfield. Accordingly we again sent a copy of our original correspondence to Mr. Mayfield with the attached cover

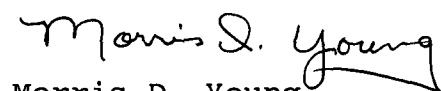
Page 2
Mr. Anderson
May 29, 1991

letter via Certified Mail, Return Receipt. As per the attached receipt, the letter was received, but as of yet we had not had any response from Mr. Mayfield.

Specifically we request you consider that these efforts constitute adequate notification and proceed with authorizing the requested expansion at your earliest convenience.

We appreciate your efforts on this matter.

Sincerely,


Morris D. Young
President

MDY/tjg

532.doc

ENVIROTECH

5796 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 8740
PHONE: (505) 632-0615

May 13, 1991

Mr. Brad Mayfield
3341 Foxgate
Memphis, Tenn 38115

Dear Mr. Mayfield:

Enclosed please find a copy of a letter dated March 14, 1991 pertaining to Envirotech Inc. expanding their Soil Remediation Site. As we were not aware that this information needed to be sent certified mail, the original letter was sent to you on the above mentioned date via regular mail.

In order for the Oil Conservation Division to process their paperwork, we need to have verification from you that you did in fact receive the original information. For your convenience, please sign the attached copy of this letter and return it to us, in the enclosed self addressed stamped envelope, verifying that you did receive this information on or about March 16, 1991.

I would appreciate your prompt attention in this matter.

Sincerely,

Morris D. Young
Morris D. Young
President

MDY:tjg

525.doc

Mr. Brad Mayfield

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. (Extra charge)
2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to:
Mr. Brad Mayfield
3341 Foxgate
Memphis, Tenn. 38115

4. Article Number
P 551 205 467

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☒ Express Mail ☒ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
Brad Mayfield
X

6. Signature - Agent
X

7. Date of Delivery
5/16/91

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

P 551 205 467
Morris D. Young
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1989-234-555

Sent to
Mr. Brad Mayfield

Street and No.
3341 Foxgate

P.O., State and ZIP Code
Memphis, Tenn. 38115

Postage
\$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt showing to whom and Date Delivered

Return Receipt showing to whom and Date, and Address of Delivery

TOTAL Postage and Fees

Postmark or Date

FARMINGTON, NM
MAY 13 1991
USPS

U.S. Form 3800, June 1985



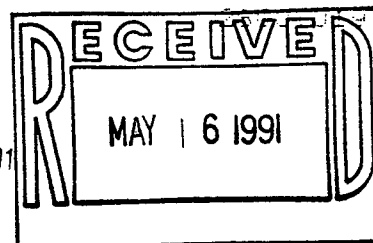
United States Department of the Interior

BUREAU OF LAND MANAGEMENT
FARMINGTON RESOURCE AREA
1235 LAPLATA HIGHWAY
FARMINGTON, NEW MEXICO 87401



IN REPLY REFER TO:

MAY 15 1991



Mr. Morris D. Young
Envirotech Inc.
640 U.S. Highway 64-3014
Farmington, NM 87401

Dear Mr. Young:

This letter is in response to a telephone call from your office received on May 13, 1991. The caller requested confirmation that the Bureau of Land Management received a letter dated March 14, 1991 concerning expansion of a Soil Remediation Site located in T. 27 N., R. 11 W., Sec. 35. This letter was received in our Farmington ELM office on March 19, 1991 at 11:10 am.

Sincerely,

Ron Fellows
Area Manager

ENVIROTECH INC.

640 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

OIL CONSERVATION DIVISION
RECEIVED
UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
'91 MAR 19 AM 9 00

March 14, 1991

Bureau of Land Management
1235 LaPlata Highway
Farmington, NM 87401

Dear Sirs:

According to the records of the County Clerk, San Juan County, New Mexico, the Bureau of Land Management is the surface owner of property in Section 35 Township 27 North Range 11 West, San Juan County, New Mexico.

Envirotech operates a Soil Remediation Site in Section 26, North of your property. This site is operated under the authorization and oversight of the State of New Mexico Oil Conservation Division.

As per the attached Oil Conservation Division correspondence, we are authorized to accept only non-hazardous soils for remediation. Received soils are spread on the land surface and disked to enhance biodegradation of any contained hydrocarbon to a non-detectable level.

The site is fenced and locked to prevent any unauthorized entry. We have constructed a four (4) foot berm around the entire site to prevent any migration of this soil off-site, even in the unlikely event of a 100 year storm.

Groundwater at the site is approximately 1252 feet below ground surface level.

This site facilitates clean-up of soils removed from groundwater sensitive areas of the oil field producing areas and associated petroleum product storage and/or sales locations of the San Juan Basin area.

We feel we operate our facility in a responsible manor that will not environmentally or commercially impact any adjoining property owners. We extend a personal invitation for you or your representatives to visit this site and view the operations there, at your convenience.

This facility is operated under Oil Conservation Division Rule 711, which requires notification of any surface owners within one-half mile of the site boundaries. We currently have an application


Page 2
Bureau of Land Management
March 14, 1991

pending with the Oil Conservation Division to expand our Remediation Site boundaries to within approximately one-quarter mile of your Northern most property line. Thriftway Marketing Corporation is the land surface owner of the property between our two properties. A copy of their correspondence is enclosed for your information.

In accordance with Section B, Rule 711, the Oil Conservation Division will issue public notice of the application for site expansion. Any person seeking to comment on the application must file comments with the Oil Conservation Division within 30 days of the date of public notice.

Your concurrence in helping us positively effect the environment of the San Juan Basin is greatly appreciated.

Sincerely,



Morris D. Young, President
Envirotech, Inc.

MDY:tjg
450.doc

c: Mr. Roger Anderson, OCD

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

640 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

'91 MAR 19 AM 9 18

March 14, 1991

Mr. Brad Mayfield
3341 Foxgate
Memphis, Tenn 38115

Dear Mr. Mayfield:

According to the records of the County Clerk, San Juan County, New Mexico, you are the surface owner of property in Section 36 Township 27 North Range 11 West, San Juan County, New Mexico.

Envirotech operates a Soil Remediation Site in Section 26, Northeast of your property. This site is operated under the authorization and oversight of the State of New Mexico Oil Conservation Division.

As per the attached Oil Conservation Division correspondence, we are authorized to accept only non-hazardous soils for remediation. Received soils are spread on the land surface and disked to enhance biodegradation of any contained hydrocarbon to a non-detectable level.

The site is fenced and locked to prevent any unauthorized entry. We have constructed a four (4) foot berm around the entire site to prevent any migration of this soil off-site, even in the unlikely event of a 100 year storm.

Groundwater at the site is approximately 1252 feet below ground surface level.

This site facilitates clean-up of soils removed from groundwater sensitive areas of the oil field producing areas and associated petroleum product storage and/or sales locations of the San Juan Basin area.

We feel we operate our facility in a responsible manor that will not environmentally or commercially impact any adjoining property owners. We extend a personal invitation for you or your representatives to visit this site and view the operations there, at your convenience.

This facility is operated under Oil Conservation Division Rule 711, which requires notification of any surface owners within one-half mile of the site boundaries. We currently have an application

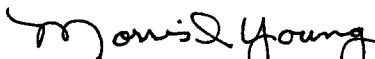
Page 2
Mr. Mayfield
March 14, 1991

pending with the Oil Conservation Division to expand our Remediation Site boundaries to within approximately one-quarter mile of your Northern most property line. Thriftway Marketing Corporation is the land surface owner of the property between our two properties. A copy of their correspondence is enclosed for your information.

In accordance with Section B, Rule 711, the Oil Conservation Division will issue public notice of the application for site expansion. Any person seeking to comment on the application must file comments with the Oil Conservation Division within 30 days of the date of public notice.

Your concurrence in helping us positively effect the environment of the San Juan Basin is greatly appreciated.

Sincerely,


Morris D. Young, President
Envirotech, Inc.

MDY:tjg
449.doc

c: Mr. Roger Anderson, OCD

Thriftway

710 East 20th Street
Farmington, New Mexico 87401

Office: (505) 326-5571
Refinery: (505) 632-3363

February 4, 1991

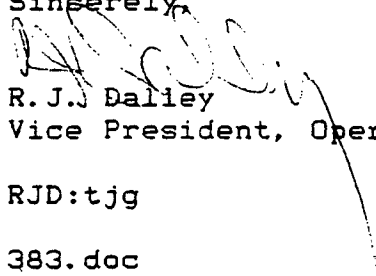
Mr. Morris D. Young, President
ENVIROTECH INC.
5796 US Hwy 64-3014
Farmington, NM 87401

Dear Mr. Young:

Thriftway Marketing Corp. has observed Envirotech's soil remediation site at Hilltop, New Mexico. We have no objection to expanding the current site to the South and East, as you have explained.

Thriftway Marketing owns the property on all four sides of your site and has no objection to this use.

Sincerely,



R.J.J. Dalley
Vice President, Operations

RJD:tjg

383.doc

ENVIROTECH INC.

UNDERGROUND DIVISION • SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

640 U.S. HIGHWAY 64 - 3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

'91 FEB 21 AM 8 52

February 19, 1991

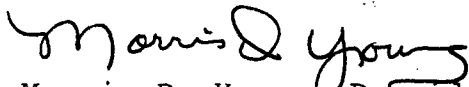
Mr. Roger C. Anderson, Environmental Engineer
OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

Enclosed please find three (3) copies of our request to expand our
Soil Remediation Site.

If you have any questions, please feel free to contact me.

Sincerely,



Morris D. Young, President
Envirotech Inc.

MDY:tjg
404.doc

*See separately bound
expansion application*

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

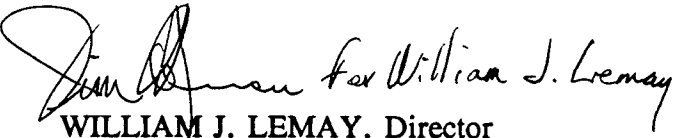
Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following application to expand a commercial solid waste disposal facility has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

Envirotech Inc., Morris D. Young, President, 311 Knudsen, Farmington, New Mexico, 87401, has submitted for approval an application to expand the previously approved commercial landfarm disposal facility for oil and gas industry generated solid wastes located in the NE/4 SE/4, Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. Liquids will not be disposed of at the facility. Soils containing non-hazardous contaminants will be spread on the surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. The permit application addresses the construction, operation, spill/leak prevention, and monitoring procedures to be utilized at the facility. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 750 feet and has an estimated total dissolved solids content of approximately 900 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The application may be viewed at the above address between 8:00 a.m. and 5:00 p.m. Monday through Friday. Prior to ruling on any proposed permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of March, 1991. To be published on or before March 29, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

AFFIDAVIT OF PUBLICATION

No. 27431

STATE OF NEW MEXICO,
County of San Juan:

CHRISTINE HILL being duly
sworn, says: "That she is the
NATIONAL AD MANAGER of
The Farmington Daily Times, a daily
newspaper of general circulation
published in English in Farmington,
said county and state, and that the
hereto attached LEGAL NOTICE

was published in a regular and entire
issue of the said Farmington Daily
Times, a daily newspaper duly quali-
fied for the purpose within the
meaning of Chapter 167 of the 1937
Session Laws of the State of New
Mexico for ONE consecutive
(days) (/////) on the same day as
follows:

First Publication THURSDAY, MARCH 28, 1991

Second Publication _____

Third Publication _____

Fourth Publication _____

and that payment therefore in the
amount of \$ 33.69 has been made.

Christine Hill
Subscribed and sworn to before me
this 29th day of
MARCH, 1991.

Connie Andrae
Notary Public, San Juan County,
New Mexico

My Comm expires: JULY 3, 1993

COPY OF PUBLICATI

NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
EMERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given
that pursuant to New
Mexico Oil Conservation
Division Regulations, the
following application to ex-
pand commercial solid
waste disposal facility has
been submitted for ap-
proval to the Director of
the Oil Conservation
Division, State Land Of-
fice Building, P.O. Box
2088, Santa Fe, New Mex-
ico 87504-2088, Tele-
phone (505) 827-5800:

Envirotech Inc.,
Morris D. Young,
President, 311
Knudsen, Farm-
ington, New Mex-
ico, 87401, has
submitted for ap-
proval an applica-
tion to expand the
previously ap-
proved commercial
landfarm disposal
facility for oil and
gas industry gen-
erated solid wastes
located in the NE/4
SE/4, Section 26,
Township 27,
North, Range 11
West, NMPM, San
Juan County, New
Mexico. Liquids will
not be disposed of
at the facility. Soils
containing non-haz-
ardous contami-
nants will be spread
on the surface of six
inch lifts or less and
periodically stirred
to enhance biode-
gradation of con-
taminants. The
permit application
addresses the con-
struction, opera-
tion, spill/leak
prevention, and
monitoring
procedures to be
utilized at the fa-
cility. The ground
water most likely to
be affected by any
accidental dis-
charges is at a
depth in excess of
750 feet and has an
estimated total dis-
solved soils content
of approximately
900 mg./l.

above. The application
may be viewed at the
above address between 8:
00 a.m. and 5:00 p.m.
Monday through Friday.
Prior to ruling on any
proposed permit or its
modification, the Director
of Oil Conservation
Division shall allow at
least thirty (30) days after
the date of publication of
this notice during which
comments may be sub-
mitted to him.

GIVEN under the Seal
of New Mexico Oil Con-
servation Commission at
Santa Fe, New Mexico, on
this 20th day of March,
1991. To be published on
or before March 29,
1991.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director

SEAL

Legal No. 27431 pub-
lished in the Farmington
Daily Times, Farmington,
New Mexico on Thursday,
March 28, 1991.

Any interested person
may obtain further infor-
mation from the Oil Con-
servation Division and
may submit written com-
ments to the Director of
Oil Conservation Division
at the address given

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following application to expand a commercial solid waste disposal facility has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088; Telephone (505) 872-5800:

Envirotech Inc., Morris D. Young, President, 311 Knudsen, Farmington, New Mexico, 87401, has submitted for approval an application to expand the previously approved commercial landfarm disposal facility for oil and gas industry generated solid wastes located in the NE/4 SE/4, Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. Liquids will not be disposed of at the facility. Solids containing non-hazardous contaminants will be spread on the surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. The permit application addresses the construction, operation, spill/leak prevention, and monitoring procedures to be utilized at the facility. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 750 feet and has an estimated total dissolved solids content of approximately 900 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of March, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. LEMAY, Director
Journal: March 29, 1991

STATE OF NEW MEXICO

County of Bernalillo

ss

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for.....1.....times, the first publication being on the.....29.....day

of.....March....., 1991, and the subsequent consecutive

publications on....., 1991.

OFFICIAL NOTICE

Bernadette Ortiz

MADE

WITH

COPIES

12/18/93

Thomas J. Smithson
Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this.....29.....day of.....March....., 1991.

PRICE.....\$19.70.....

Statement to come at end of month.

CLA-22-A (R-12/91)

ACCOUNT NUMBER.....C80932.....

OIL CONSERVATION DIVISION
RECEIVED

'91 APR 4 AM 9 1

ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

3111 KNUDSEN
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 326-2822

RECEIVED

May 29, 1990

JUN 1 1990

OIL CONSERVATION DIVISION

Mr. William J. LeMay, Director
Oil Conservation Division
PO Box 2088
State Land Office Bldg.
Santa Fe, New Mexico 87504

*See separately bound
application*

Re: Land Remediation Site for
Hydrocarbon Contaminated Soils

Dear Mr. LeMay:

Envirotech has secured a naturally enclosed site to remediate hydrocarbon contaminated soils. The purpose of this report is to detail the site features and request Oil Conservation Division authorization to operate this site for soil remediation.

Envirotech currently is stock piling hydrocarbon contaminated soils at the Thriftway Refinery awaiting approval of this Land Remediation Site. These contaminated soils have been excavated as a result of remediation efforts of point sources of hydrocarbon contamination at the refinery proper.

Envirotech has purchased an approximate 15 acre site encompassing a natural basin near Hilltop, New Mexico. The property is approximately 14 miles South of Bloomfield, New Mexico, off of U. S. Highway 44, in San Juan County.

The natural basin has been enclosed with a 5 wire barb wire fence with swinging gates as shown on the accompanying photographs of the site; Attachment A.

As one can determine from the foldout FULL VIEW OF ENCLOSED BASIN this natural depression is bounded on all sides to prevent any migration of hydrocarbons should even a 100 year storm occur.

Attachment C, SITE PLAN, SITE PROFILES, delineates the site contours, again confirming full containment on site of any soil constituents within the remediation site. At the center of the enclosure is a gravel pit excavation that would impound any site runoff that may occur.

The site is bounded on all sides by property owned by Thriftway Marketing Corp. as shown by the Area/Property Ownership Map; Attachment B. We have contacted both Thriftway Marketing and the Hilltop Liquor Store and secured an Affidavit from both entities attesting to the fact that they have no objections to Envirotech utilizing this site for soil remediation purposes. The referenced affidavits are Attachments G and H.

Hilltop Liquor Store owns and operates the only waterwell within four miles of the remediation site as per Attachment I; RECORDS OF NEW MEXICO STATE ENGINEERS OFFICE. This well which is located at the Hilltop Liquor Store was apparently drilled as a gas/oil test and then later completed as a water well at 1280 feet. Water stands at 750 in the casing. The well is completed with 8" steel casing cemented to surface according to the owner.

No record of drilling or subsequent conversion to a water well is in Oil Conservation Division files and the only information the New Mexico State Engineers office has is found in Attachment I. Hydrocarbon contaminated soils would be spread at the site in layers of four to six inches. On a monthly schedule the soil would be turned or disked. Records of each load received, its origin and monthly organic vapor meter readings would be maintained for Oil Conservation Division inspection.

We feel the proposed soil remediate site is near ideal and should receive approval for the following reasons:

- 1) The site is a natural basin which will contain any hydrocarbon migrations within the property enclosure.
- 2) The site has been fenced to preclude exposure to any cattle, horses, wildlife, etc.
- 3) The depth to ground water is 1280 feet.
- 4) The site has good access from the major highway, U.S. 44.
- 5) Surrounding property owners do not object to the proposed remediation use of the site.
- 6) The site is remote from the population centers of San Juan County.
- 7) There is currently no existing soil remediation site available in Northwestern New Mexico. It would be our intention to accept hydrocarbon contaminated soils from oilfield and refinery/gas plants operating throughout the basin.
- 8) The site is located within developed oil and gas fields and is compatible with those operations.
- 9) There is an immediate need for a soil remediation site to accept soils already excavated, thus preventing additional migration of hydrocarbon contaminations.

We request your timely consideration of this request. If we can provide any additional information or in anyother way be helpful, please contact us.

Sincerely,

ENVIROTECH INC.



Morris D. Young
President

MDY:mf

Enclosures

COMPANY INSPECTION

NAME OF COMPANY:

Envirotech

LOCATION:

Envirotech Landfarm south of Bloomfield

INSPECTION DATE:

9/6/90

REPORT:

Arrived on site at 1200 hrs.

OCD Inspectors - Bill Olson, Roger Anderson

Met with Morris Young to inspect facility

Soils in south end of landfarm spread in six inch lifts.

Numerous piles of contaminated soils which are not spread in lifts located in North end of landfarm

Morris Young stated that spreading equipment ~~was~~ is currently doing dirt work at Thruway Refinery

OCD informed him ^{soils} not spread in lifts violates permit conditions.

Morris Young stated that soils would be spread in lifts on Mon. 9/10/90

ENVIROTECH INC.

UNDERGROUND TANK TESTING • OIL CONSERVATION DIVISION
SITE ASSESSMENT • SITE REMEDIATION
RECEIVED

3111 KNUDSEN
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 326-2822

'90 SEP 11 AM 8 37

September 10, 1990

Mr. William J. LeMay, Director
OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, New Mexico 87504

Re: Envirotech Solids Disposal Facility
San Juan County, New Mexico

Dear Mr. LeMay:

Envirotech operates a soil remediation site in NE/4 SE/4, Section 26, Township 27 North, Range 11 West NMPM, San Juan County, New Mexico. This facility is operated under the approval and oversight of the Oil Conservation Division.

The Envirotech site consists of approximately 15.15 acres of which approximately 6 acres has been bermed and fenced for soil acceptance. The demand for a soil remediation site by petroleum producers, refineries and retailers has resulted in utilization of much of the fence enclosed area. In order to facilitate the demand we request authorization to berm and fence the property to its South and West property lines.

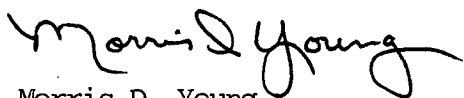
A 4-foot high berm with 2:1 slope will ensure containment on site of any storm waters. A five wire barbed wire fence will be placed at the outside toe of the berm slope to prevent livestock from entering the facility.

We understand the conditions for approval of the remediation site as set forth in your correspondence of August 1, 1990 will apply to this extension of the remediation area.

We appreciate working with you on this matter. If we can provide any additional information or in other ways be helpful, please contact us.

Sincerely,

ENVIROTECH INC.



Morris D. Young
President

MDY:mf

STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following permit to construct and operate a commercial solid waste disposal facility has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

Envirotech Inc., Morris D. Young, President, 311 Knudsen, Farmington, New Mexico, 87041, has submitted for approval an application to construct and operate a commercial landfill disposal facility for oil and gas industry generated solid wastes located in the NE/4 SE/4, Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. Liquids will not be disposed of at the facility. Soils containing non-hazardous contaminants will be spread on the surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. The permit application addresses the construction, operation, spill/leak prevention, and monitoring procedures to be utilized at the facility. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 750 feet and has an estimated total dissolved solids content of approximately 900 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of June, 1990.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/William J. Lemay
Director

Journal, June 30, 1990

STATE OF NEW MEXICO }
County of Bernalillo

ss

OIL CONSERVATION DIVISION
RECEIVED

Thomas J. Smithson, being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 30 day
of June, 1990, and the subsequent consecutive
publications on 21 June, 1990.

Sworn and subscribed to before me, a Notary Public in
and for the County of Bernalillo and State of New
Mexico, this 2 day of July, 1990.

PRICE \$17.95

Statement to come at end of month.

ACCOUNT NUMBER C81184

OFFICIAL SEAL

Bernadette Ortiz
Notary Public-New Mexico

ERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
J WITH SECRETARY OF STATE
Expires 12-18-93

EDJ-15 (R-12/89)

AFFIDAVIT OF PUBLICATION

COPY OF PUBLICATI

No. 26068

STATE OF NEW MEXICO,
County of San Juan:

BETTY SHIPP being duly
sworn, says: "That she is the
NATIONAL AD MANAGER of
The Farmington Daily Times, a daily
newspaper of general circulation
published in English in Farmington,
said county and state, and that the
hereto attached LEGAL NOTICE

was published in a regular and entire
issue of the said Farmington Daily
Times, a daily newspaper duly quali-
fied for the purpose within the
meaning of Chapter 167 of the 1937
Session Laws of the State of New
Mexico for ONE consecutive
(days) (/////) on the same day as
follows:

First Publication FRIDAY, JUNE 29, 1990

Second Publication _____

Third Publication _____

Fourth Publication _____

and that payment therefore in the
amount of \$ 36.17 has been made.

Betty Shipp

Subscribed and sworn to before me
this 29TH day of
JUNE, 1990.

Connie Andrae

Notary Public, San Juan County,
New Mexico

My Comm expires: July 3, 1993

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

Notice is hereby given
that pursuant to New
Mexico Oil Conservation
Division Regulations, the
following permit to con-
struct and operate a com-
mercial solid waste dis-
posal facility has been
submitted for approval to
the Director of the Oil
Conservation Division,
State Land Office Build-
ing, P. O. Box 2088, San-
ta Fe, New Mexico
87504-2088, Telephone
(505)827-5800:

Envirotech Inc.,
Morris D. Young,
President, 311
Knudsen, Farm-
ington, New Mex-
ico, 87401, has
submitted for ap-
proval an applica-
tion to construct
and operate a com-
mercial landfarm
disposal facility for
oil and gas industry
generated solid
wastes located in
the NE/4 SE/4, Sec-
tion 26, Township
27 North, Range 11
West, NMPM, San
Juan County, New
Mexico. Liquids
will not be disposed
of at the facility.
Soils containing
non-hazardous con-
taminants will be
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face in six inch lifts
or less and period-
ically stirred to
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ation of contami-
nants. The permit
application ad-
dresses the con-
struction, opera-
tion, spill/leak
prevention, and
monitoring
procedures to be
utilized at the fa-
cility. The ground
water most likely to
be affected by any
accidental dis-
charges is at a
depth in excess of
750 feet and has an
estimated total dis-
solved solids con-
tent of approx-
imately 900 mg/l.

Any interested person
may obtain further infor-
mation from the Oil Con-
servation Division and
may submit written com-
ments to the Director of
the Oil Conservation
Division at the address
given above. Prior to rul-
ing on any proposed per-
mit or its modification the

Director of the Oil Con-
servation Division shall al-
low at least thirty (30)
days after the date of
publication of this notice
during which comments
may be submitted to him.

GIVEN under the Seal
of New Mexico Oil Con-
servation Commission at
Santa Fe, New Mexico, on
this 21st day of June,
1990. To be published on
or before June 27, 1990.

STATE OF
NEW MEXICO

OIL
CONSERVATION
DIVISION

WILLIAM J. LEMAY,
Director

SEAL

Legal No. 26068 pub-
lished in the Farmington
Daily Times, Farmington,
New Mexico on Friday,
June 29, 1990.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

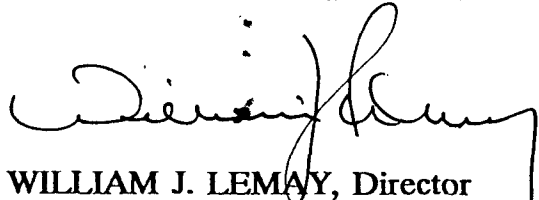
Notice is hereby given that pursuant to New Mexico Oil Conservation Division Regulations, the following permit to construct and operate a commercial solid waste disposal facility has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

Envirotech Inc., Morris D. Young, President, 311 Knudsen, Farmington, New Mexico, 87401, has submitted for approval an application to construct and operate a commercial landfarm disposal facility for oil and gas industry generated solid wastes located in the NE/4 SE/4, Section 26, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. Liquids will not be disposed of at the facility. Soils containing non-hazardous contaminants will be spread on the surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. The permit application addresses the construction, operation, spill/leak prevention, and monitoring procedures to be utilized at the facility. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 750 feet and has an estimated total dissolved solids content of approximately 900 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of June, 1990. To be published on or before June 27, 1990.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L



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

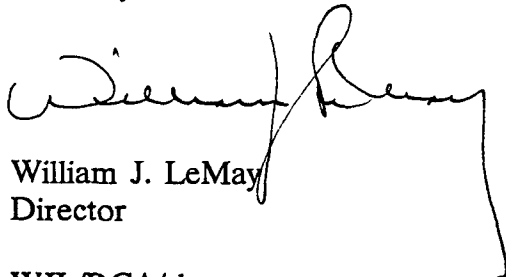
Page -2-

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

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time

8:30 AM

Date

9/28/90

Originating Party

Denny Foust - OCE Aztec

Other Parties

Dave Boyer - OCE

Subject

ENVIROtech Landfarm

Discussion

Denny called to report that he visited site on 9/22/90 at 4 PM. Front end loader was on site but not working. Some soil had been spread earlier that day or day before (9/26). Soil did not appear to have been disced.

Conclusions or Agreements

Distribution

ENVIROtech File

Signed

Dave Boyer

COMPANY INSPECTION

NAME OF COMPANY: Envirotech Landfarm

LOCATION: _____

INSPECTION DATE: 9/14/90 1500 hrs.

REPORT: Site inspected by Bill Olson

Walked site and photographed.

Numerous piles of contaminated soil in North Landfarm
Soil not spread in six inch lifts violates permit
conditions

Morris Young had stated on 9/6/90 that soils would
be spread on Mon. 9/10/90. Work has not
been done as scheduled

Piled soil also located on top of spread soil
Took photographs of all aspects of facility

ENVIROTECH INC.

OIL CONSERVATION DIVISION

RECEIVED
UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

'90 OCT 11 AM 8 47

3111 KNUDSEN
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 326-2822

October 2, 1990

Mr. William J. LeMay, Director
Oil Conservation Division
State of New Mexico
PO Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Re: Envirotech Land Farm Operations

Dear Mr. LeMay;

As per your letter of September 27, 1990, Envirotech agrees to spread disc all soils received at the facility within 72 hours of receipt.

Subsequent to the September 25, 1990 site visit by OCD personnel, all soils have been spread and turned with a grader. A disc will be stationed at the land farm as of October 5, 1990 to facilitate remediation of the soils.

Sincerely,

ENVIROTECH INC.



Morris D. Young
President

MDY:mf