

**NM1 - 11**

**GENERAL  
CORRESPONDENCE**

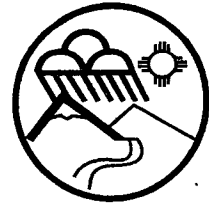
**YEAR(S):**

**2006-1991**



**BILL RICHARDSON**  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Office of General Counsel*  
*Harold Runnels Building*  
*1190 St. Francis Drive, P.O. Box 26110*  
*Santa Fe, New Mexico 87502-6110*  
*Telephone (505) 827-2990*



**RON CURRY**  
SECRETARY

November 15, 2006

**DERRITH WATCHMAN-MOORE**  
DEPUTY SECRETARY

**TRACY HUGHES**  
GENERAL COUNSEL

VIA FIRST CLASS MAIL

Matt Armstrong  
295 Chipeta Way  
Salt Lake City, UT 84108

Re: Request to Inspect Public Records

Dear Mr. Armstrong:

On November 7, 2006, this office received a request via facsimile. You request a copy of the waste transfer, storage and disposal facility permit for Envirotech Inc. Soil Remediation Facility Landfarm #2 in Hilltop, New Mexico.. (See attached request.)

It was brought to my attention that maybe our Ground Water Quality Bureau might have something on this property or that the Energy, Mining and Minerals Division through their Oil Conservation Division. I have forwarded your request to these two departments.

Should you have any questions, please contact the Ground Water Quality Bureau at (505)2919 or Energy, Mining and Minerals Divisions at (505) 476-3440.

Sincerely,

*Melissa Y. Mascareñas*

Melissa Y. Mascareñas  
New Mexico Environment Department  
Department Public Records Custodian

cc: Bill Olson, Ground Water Quality Bureau  
IPRA Officer, Energy, Mining and Minerals Division ✓



**NEW MEXICO ENVIRONMENT DEPARTMENT  
INSPECTION OF PUBLIC RECORD REQUEST FORM**

Please fill out the following information:

1. Date: 11/7/06 \_\_\_\_\_
2. Requestor's Name: Matt Armstrong \_\_\_\_\_
3. Requestor's Address: 295 Chipeta Way Salt Lake City, UT 84108 \_\_\_\_\_  
\_\_\_\_\_
4. Phone No.: (801) 584-6354 \_\_\_\_\_
5. Company Being Represented: Williams Gas Pipeline \_\_\_\_\_  
\_\_\_\_\_
6. Address: 295 Chipeta Way Salt Lake City, UT 84108 \_\_\_\_\_  
\_\_\_\_\_
7. Document/File being requested to be reviewed or copied (please describe the records in sufficient detail to enable Department personnel to reasonably identify and locate the records: A copy of the waste transfer, storage and disposal facility permit for Envirotech Inc. Soil Remediation Facility, Landfarm #2 in Hilltop, New Mexico.  
\_\_\_\_\_  
\_\_\_\_\_
8. NMED Bureau where Document/File can be found (if known): \_\_\_\_\_

\_\_\_\_\_  
Signature

**The cost of requestor copying is 25 cents per page for 8 1/2 x 11, for all other sized or redacted documents consult NMED Policy 25-09.**

**Please send this request to:**

**Melissa Mascareñas  
Inspection of Public Records Officer  
1190 St. Francis Drive, Ste. N-4050  
Santa Fe, New Mexico 87505  
or fax: (505) 827-1628**

August 29, 2006

## ENVITOTECH INC

Landfarm Financial Assurance

Based on a Maximum of 50 cells open with remediation not completed and approved  
Closure figured over 18 months

1. Based on a Pohl Industries submittal:

- A. Tilling costs of \$8.50 per acre on an average of 150 acres open over the 18 month closure period is \$46,800.
- B. Reseeding costs for grass seed applied with a grain drill is \$8.50 per acre for 300 acres, plus grass seed and amendments of \$81 per acre for 300 acres is a total \$26,850.
- C. Berm and fence removal is estimated to be \$4,280

Sub-total \$77,930

2. Based on Envirotech known laboratory costs:

- A. Quarterly background BTEX analysis and an 8015 procedure are \$139, an average of 30 cells will be open over the closure period of 18 months (6 quarters X 30 cells) is \$25,020.
- B. Annual and closure vadose zone sampling will be an additional \$184 per sample for Metals and Cation/Anion analysis. A total of 100 samples will be needed for 50 cells with annual sampling and vadose zone closure sampling for a total laboratory cost of \$18,400
- C. Closure sampling figured on two samples per 5 acre cell will be \$139 per sample for a total of \$13,900.

Sub-total \$57,320

3. Blagg Engineering estimates sampling:

- A. Quarterly vadose zone sampling will cost \$150.34 per sample. Calculated on an average of 30 cells open over the 4 quarters in addition to annual and closure sampling is used in these calculations this is a total cost of (120 x \$150.34) \$18,040
- B. Cost of \$150.34 per five point vadose zone background samples based on 50 cells requiring annual and closure sampling this is a cost of (100 x \$150.34) \$15,034.
- C. Closure Sampling for remediation is \$35.41 per sample, utilizing an average of 2 samples per cell for 50 cells is (100x35.41) giving a cost of \$3,541.

Sub-total \$36,615

Total Closure Cost: \$171,865



POHL INDUSTRIES  
5 CR 5255  
BLOOMFIELD NM 87413  
505-632-0647

We are pleased to provide the following estimate for remediation of Landfarm #2 owned and operated by Young Environmental Services Inc DBA Envirotech Inc.

The area is comprised of a total of 308 acres requiring disking every two (2) weeks for a period of eighteen (18) months.

Using that base information we are prepared to submit the following bid:

Machinery	\$60.00
Labor	\$10.00
Fuel	<u>\$15.00</u>
	\$85.00

We are able to disk approximately ten (10) acres per hour for a ten (10) hour day which averages 100 acres a day (+ or -). So we will be able to cover the entire 308 acres in three (3) days at a cost of \$2550.00. Over a period of eighteen months the total cost would be \$91,800.00. In addition we would charge an additional \$89.50 per acre to reseed the designated area, which includes the cost of seed and labor. That additional cost would be \$27,566.00.

In the event you require the fences to be removed and the berms leveled, the additional cost would be \$4,280.00.

Thanks you for the opportunity to provide this quote to you.

David L Pohl

**BLAGG ENGINEERING, INC.**  
**COST ESTIMATOR SHEET**

**PROJECT LOCATION:** Envirotech Landfarm

**PROJECT SCOPE:** Quarterly Cell Monitoring  
 Estimated Per Cell Per Quarter Sampling Cost  
 Surface Cell Testing

**DATE:** August 17, 2006

**COST DETAIL:**

<u>Personnel</u>	<u>No. Hours</u>	<u>Cost /hr</u>	<u>Total Cost</u>
1 ea 5-pt surface	0.25	\$70.00 /hr	\$17.50
Quarterly Report	0.15	\$70.00 /hr	\$10.50
Personnel Total:			\$28.00
<u>Equipment</u>	<u>No. Units</u>	<u>Cost /unit</u>	<u>Total Cost</u>
Support Vehicle	0.25	\$18.00 /hr	\$4.50
GPS Unit	0.25	\$2.00 /hr	\$0.50
Equipment Total:			\$5.00
<u>Outside Services</u>	<u>No. Units</u>	<u>Cost /unit</u>	<u>Total Cost</u>
Assumptions: (1) Envirotech will provide a site plat with 5-acre cell layouts			
(2) Envirotech will provide loader or backhoe to scrape surface landfarm to top of native soil to facilitate sampling and measurement of LF thickness at each sample point.			
(3) Envirotech will provide in-house laboratory services			
(4) This is a cost estimate only. All parties will be best served by conducting work on a time and materials basis.			
Outside:			\$0.00
Project Sub-Total:			\$33.00
NMGRT	0.0731		\$2.41
Total:			\$35.41

**BLAGG ENGINEERING, INC.**  
**COST ESTIMATOR SHEET**

**PROJECT LOCATION:** Envirotech Landfarm

**PROJECT SCOPE:** Quarterly Cell Monitoring  
 Estimated Per Cell Per Quarter Sampling Cost  
 Subgrade Testing

**DATE:** August 17, 2006

**COST DETAIL:**

<u>Personnel</u>	<u>No. Hours</u>	<u>Cost /hr</u>	<u>Total Cost</u>
1 ea 5-pt comp @ 3'	1.25	\$70.00 /hr	\$87.50
Quarterly Report	0.33	\$70.00 /hr	\$23.10
Personnel Total:			\$110.60
<u>Equipment</u>	<u>No. Units</u>	<u>Cost /unit</u>	<u>Total Cost</u>
Support Vehicle	1.50	\$18.00 /hr	\$27.00
GPS Unit	1.25	\$2.00 /hr	\$2.50
Equipment Total:			\$29.50
<u>Outside Services</u>	<u>No. Units</u>	<u>Cost /unit</u>	<u>Total Cost</u>
Assumptions: (1) Envirotech will provide a site plat with 5-acre cell layouts			
(2) Envirotech will provide loader or backhoe to scrape surface landfarm to top of native soil to facilitate sampling and measurement of LF thickness at each sample point.			
(3) Envirotech will provide in-house laboratory services			
(4) This is a cost estimate only. All parties will be best served by conducting work on a time and materials basis.			
Outside:			\$0.00
Project Sub-Total:			\$140.10
NMGRT	0.0731		\$10.24
Total:			\$150.34

# ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

## Landfarm Lab Charges

Background: One sample taken for 5 acre cells four times a year.

### First, Second & Third Quarter

8015	\$69.50
BTEX	\$69.50
	<hr/>
	\$139.00

### Forth Quarter

8015	\$69.50
BTEX	\$69.50
Metals	\$115.00
Cation/Anion	\$69.00
	<hr/>
	\$323.00

Closure: One sample taken per 5 acre cell

(TPH must be below 100ppm, BTEX less then 50ppm and Benzene 10ppm to close cell)

8015	\$69.50
BTEX	\$69.50
	<hr/>
	\$139.00



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

June 21, 2006

Mr. Morris D. Young  
Envirotech, Inc.  
5796 U.S. Highway 64  
Farmington, NM 87401

RE: Update and Recap of Various Pending Issues

Dear Mr. Young:

Envirotech, Inc. (Envirotech) has several issues, with the New Mexico Oil Conservation Division (NMOCD) that need to be resolved.

1. **Request for Modification of Permit NM-01-0011, Envirotech Landfarm #2 Dated October 6, 2004.** This is a request that Envirotech be allowed to accept salt-contaminated waste into the landfarm. This request is hereby approved with the condition that no waste exceeding 1,000 mg/Kg (1,000 parts per million) chlorides may be placed in the landfarm.
2. **Request for Modification of Permit NM-01-0011, Envirotech Landfarm #2 Dated April 14, 2006.** This request is for the ability to "bio-pile" heavy tank bottoms in Cells G-9, G-10, H-9, and H-10. This request is hereby approved with the condition that the bio-pile process will be exactly as described in the request.
3. **Landfarm Issues Letter Dated May 19, 2006.** In this letter, Envirotech has courteously informed the NMOCD of certain activities that have taken place, or will take place, at the landfarm. The NMOCD acknowledges receipt of this letter.
4. **Landfarm Expansion by 27.69 ± Acres.** This expansion is the last 1/3 of the 82.69-acre expansion approved by the NMOCD on August 27, 2003. Total landfarm area after this expansion will amount to 133.69 ± acres. This request has **not** been approved by the NMOCD because acceptable financial assurance in the amount of \$18,385 has not been received. Immediate action is required to bring the Envirotech total financial assurance up to \$90,155.
5. **Landfarm Expansion by 32.1 ± Acres Request Dated July 12, 2005.** This request is being held in abeyance pending the completion of the actions required in #4 above.
6. **Possible Landfarm Expansion by 100 ± Acres in the Area North of the Blending Area.** No formal request for this expansion has been received by the NMOCD. Therefore, no action is taken at this time.
7. **Landfarm Map.** The NMOCD hereby formally requests that Envirotech prepare a map showing the permitted landfarm area. This map must include:
  - a. Section, township and range;

- b. The areas that are currently being landfarmed including cell numbers;
- c. The areas that are not currently being landfarmed and cell numbers if any have been assigned;
- d. Any proposed expansion areas, as of today, must be identified;
- e. The area(s) covered by permits issued by the New Mexico Environment Department;
- f. All roads must be shown and labeled;
- g. If any pipelines cross the permitted landfarm area, such pipelines must be so labeled on the map.

Envirotech will be required to increase their financial assurance for the expansions outlined in #'s 5 and 6 above. No landfarming may take place in these areas until such financial assurance is received.

If you have any questions, contact me at (505) 476-3490 or [wayne.price@state.nm.us](mailto:wayne.price@state.nm.us)

NEW MEXICO OIL CONSERVATION DIVISION



Wayne Price  
Environmental Bureau Chief

*WP/EM*

Copy: NMOCD, Aztec

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

October 6, 04

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

Phone (505) 476-3492  
Fax (505) 476-3462


**RE: REQUEST FOR MODIFICATION OF PERMIT NM-01-0011, ENVIROTECH LANDFARM #2**

Dear Mr. Martin:

Envirotech Inc. respectfully requests modification of Permit NM-01-0011 due to the promulgation of Rule 50. We request the permit include the acceptance of Salt Contaminated Waste. The wastes will be handled in a similar manner as the hydrocarbon-contaminated waste. If the waste is accepted with any liquids present it will be accepted in to concrete mixing impoundment prior to solidification and application to the landfarm. If the waste is accepted in a solidified form it will be placed on the landfarm and will be spread in lifts of 6 inches or less and disked within 72 hours of receipt and be disked biweekly.

Envirotech's Landfarm #2 is located 1280 feet above groundwater. It is located on top of the Nacimiento Formation that overlies the Ojo Alamo Formation. The Nacimiento Formation extends approximately 1100 feet below the landfarm before meeting the Ojo Alamo Formation. The Nacimiento Formation is an effective aquatard due to the low permeability beds of mudstone and clay stone at the top of the formation and interbedded black, carbonaceous mudstones and white, coarse-grained sandstones in the lower part of the formation. The sandy loam, which covers the site, is an excellent absorbent. Background and quarterly monitoring at the site has shown that there is historically no migration of contamination from stabilized waste below 6 inches into native soil. Therefore, Envirotech is of the opinion that this amendment is protective of groundwater and that no threat to groundwater, human health, or the environment will result from the land application of Salt contaminated wastes.

Respectfully Submitted,  
ENVIROTECH INC.

  
Brandon Powell  
Landfarm Manager  
[bpowell@envirotech-inc.com](mailto:bpowell@envirotech-inc.com)

  
Morris D Young  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

BJP:/Office/Client/LF/landfarm/10-6-04LF2PermitMod.doc.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

September 17, 2004

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

Director

**Oil Conservation Division**

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

Dear Mr. Young:

Since the New Mexico Oil Conservation Division (NMOCD) promulgated Rule 50 covering pits and below-grade tanks, there has arisen a need, in certain circumstances, for operators to transport their drill cuttings off-site and dispose of them.

NMOCD Rule 711, as it pertains to landfarms, does not specifically address the issue of exempt oilfield wastes that may be contaminated with salts. Your landfarm application and permit were written with only hydrocarbon-contaminated soils in mind. Salt-contaminated wastes cause the following problems:

1. Lessening the effectiveness of the biodegradation capacity of your landfarm
2. Rapid leachability causing adverse effects on groundwater

If you want to accept salt-contaminated cuttings or any other salt-contaminated wastes, your 711 permit must be modified to ensure that your acceptance of those wastes will not adversely affect public health or the environment.

Please check one of the following:

☒ I have accepted or intend to accept salt-contaminated wastes in my landfarm. An OCD form C-137, applying for a modification to my 711 permit is attached. Included, as an attachment, is a demonstration that the accepted salt-contaminated soils will not adversely affect groundwater in the foreseeable future. (Closure requirements will also require modification to ensure the protection of groundwater. Should your acceptance of salt-contaminated wastes prove detrimental to groundwater, future liability for such damage rests with the landfarm operator).

☐ I do not intend to accept salt-contaminated wastes in my landfarm. Should this condition change, I will submit an OCD Form C-137 for a modification to my 711 permit at that time.

New Mexico Oil Conservation Division  
Attn: Ed Martin  
1220 S. St. Francis  
Santa Fe, NM 87505

This letter must be returned to the above address no later than October 31, 2004. An extension of time may be granted if you contact this office no later than that date.

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

Signed Morris D. Young

Date 10-06-04



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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-137  
Revised June 10, 2003

Submit Original Plus 1  
Copy to Santa Fe  
1 Copy Appropriate  
District Office

## APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other  
☒ Solids/Landfarm ☐ Treating Plant

2. Operator: Envirotech Inc.

Address: 5796 U.S. Hwy 64, Farmington, New Mexico 87401

Contact Person: Brandon Powell or Morris Young Phone: (505) 632-0615

3. Location:        /4    NW    /4 Section   6   Township  26N  Range  10W   
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☒ Yes ☐ No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

8. Attach a contingency plan for reporting and clean-up for spills or releases.

9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

12. Attach proof that the notice requirements of OCD Rule 711 have been met.

13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

### 15. CERTIFICATION

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

Name: Morris D. Young

Title: President

Signature: Morris D. Young

Date: 10-06-04

E-mail Address: myoung@Envirotech-inc.com

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-137  
Revised June 10, 2003

Submit Original Plus 1  
Copy to Santa Fe  
1 Copy Appropriate  
District Office

2006 SEP 21 PM 4:11  
**APPLICATION FOR WASTE MANAGEMENT FACILITY**

(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other  
☒ Solids/Landfarm ☐ Treating Plant

2. Operator: Envirotech Inc.

Address: 5796 U.S. Hwy 64, Farmington, New Mexico 87401

Contact Person: Brandon Powell or Morris Young Phone: (505) 632-0615

3. Location:          /4   NW   /4 Section   6   Township   26N   Range   10W    
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☒ Yes ☐ No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.

8. Attach a contingency plan for reporting and clean-up for spills or releases.

9. Attach a routine inspection and maintenance plan to ensure permit compliance.

10. Attach a closure plan.

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.

12. Attach proof that the notice requirements of OCD Rule 711 have been met.

13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

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

Name: Morris D. Young

Title: President

Signature: Morris D. Young

Date: 04-19-06

E-mail Address: myoung@Envirotech-inc.com

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

April 14, 2006

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

Phone (505) 476-3492  
Fax (505) 476-3462

**RE: REQUEST FOR MODIFICATION OF PERMIT NM-01-0011, ENVIROTECH LANDFARM #2**

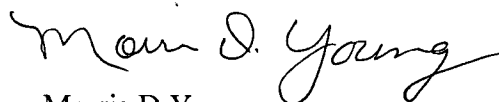
Dear Mr. Martin:

Envirotech Inc. respectfully requests modification of Permit NM-01-0011 to include the option to bio-pile heavy tank bottoms in Cells G-9, G10, H-9, and H10. The bio-piling will consist of mixing the tank bottoms with manure and urea nitrate to expedite the remediation process. This request is made due the extremely lengthy time that remediation would take by land farming. The Bio-pile process for soils will continue until they meet the NMOCD standards for land farming.

Respectfully Submitted,  
ENVIROTECH INC.



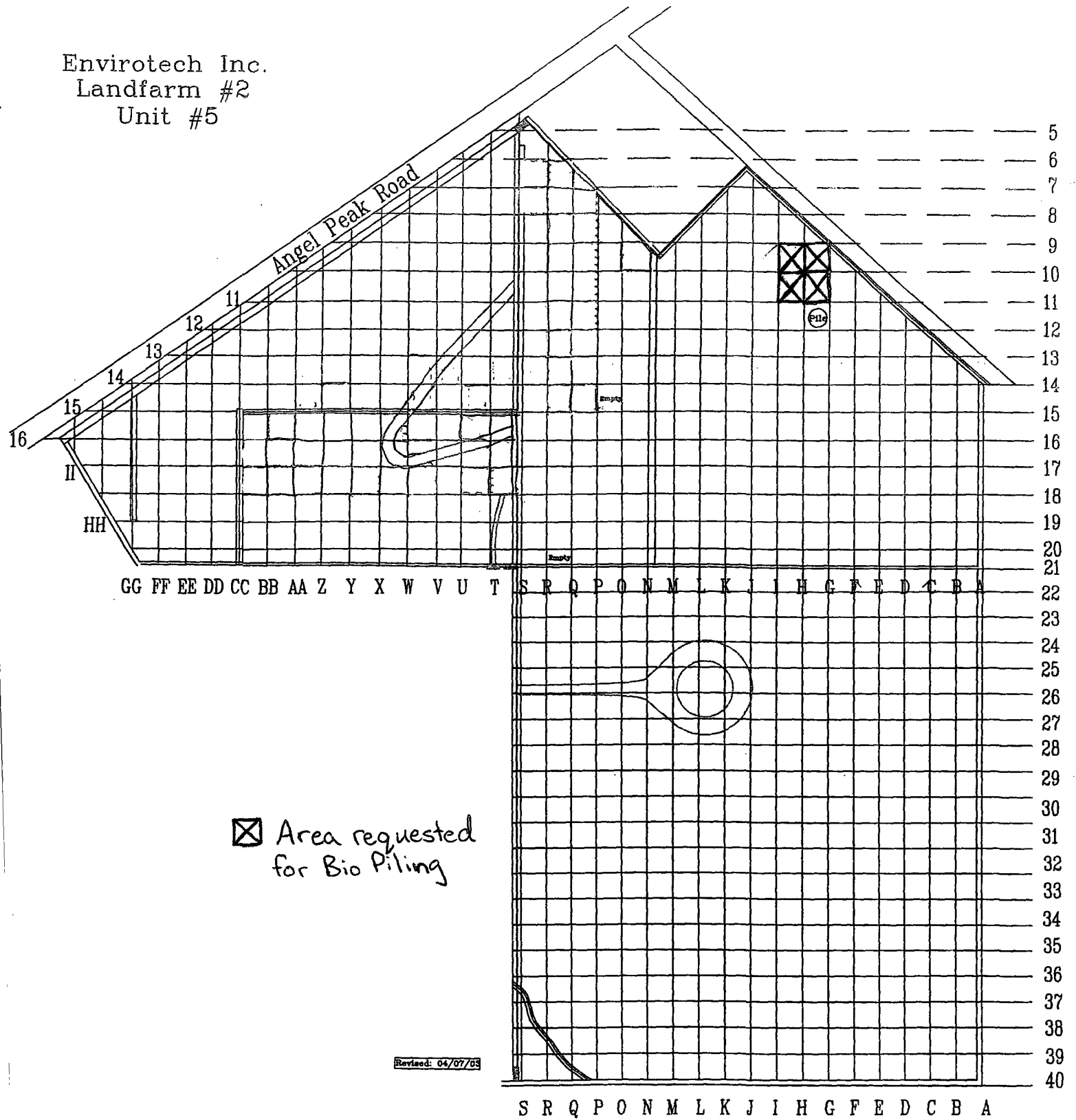
Brandon Powell  
Landfarm Manager  
[bpowell@envirotech-inc.com](mailto:bpowell@envirotech-inc.com)



Morris D Young  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

BJP:/Office/Client/LF/landfarm/10-6-04LF2PermitMod.doc.

Envirotech Inc.  
Landfarm #2  
Unit #5



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

May 19, 2006

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

2006 MAY 23 PM 12 52

Phone: (505) 476-3440  
Fax: (505) 476-3462

RE: LANDFARM ISSUES

Dear Mr. Martin:

As per our recent conversation, producers have been sending drilling fluids to Envirotech when they have flow back or have to move pits, etc.. These fluid all have suspended solids; some have hydrocarbon contamination, and some do not. Contaminated fluids are received into the blending facility and stabilized for remediation.

Some non-hydrocarbon contaminated drilling fluids have been accepted for dust palliation by direct application. We are applying these in the producer's soil remediation cell followed by immediate soil tilling to guarantee full absorption and prevent any migration. This practice allows use of these non contaminated drilling fluids rather than hauling in water from Bloomfield to aid in dust control and to provide moisture to accelerate the natural remediation process.

Mr. Denny Foutz felt it would be prudent to have you acknowledge that we have discussed this procedure.

We also want to let you know that we are filling a barrow pit that was dug to build US Highway 44 (now US Hwy 550). The barrow pit was at the edge of our former Landfarm No. 1 that we closed in 1993. This parcel has since been used as a construction staging yard. We are filling the pit with concrete, rocks, and tree roots and other clean debris from demolition of both oilfield and non oilfield facilities. Additionally, rock and chunks of concrete removed from our landfarm areas will be buried in this old pit. Once the pit is near the original ground surface, we will cap it with native soils and recontour to match the existing ground surface.

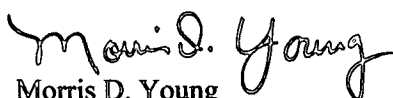
Every effort will be made to only dispose of only clean structural fill and keep it free of debris and trash.

Even though this pit is just adjacent to our former landfarm permitted area, we felt it was courteous to keep you apprised of what was going on. Also, we wanted to let you know that we had previously contacted the New Mexico Environmental Department to make sure of the rules for disposal of clean fill on private land.

We have appreciated working with you and hope you enjoy your new assignment. Should you have any questions or comments regarding this letter, please feel free to contact us at (505) 632-0615. Thank you for your time and consideration.

Sincerely,

ENVIROTECH INC.



Morris D. Young

President

[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

cc: Denny Foutz – NMOCD

MDY:ib/office/landfarm/51906emartinletter.doc



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

February 2, 2006

Mr. Morris Young  
Envirotech, Inc.  
5796 U.S. highway 64  
Farmington, NM 8740

RE: Phased-In Landfarm Expansion

The New Mexico Oil Conservation Division (NMOCD) has received the required additional financial assurance (\$18,835) for the final 1/3 of the landfarm expansion approved by the NMOCD letter dated April 18, 2000.

Your expansion into the 27.69-acre area is approved with the following conditions:

1. The additional acreage is to be operated according to the conditions placed on Envirotech's permit (NM-1-011) per NMOCD's approval letter dated September 17, 2002.
2. NMOCD understands that this expansion is the final of three expansions approved in our April 18, 2000 letter referred to above. Expansions have been scheduled as follows:
  - a. 27.5 acres in 2003 – financial assurance received.
  - b. 27.5 acres in 2004 – financial assurance received.
  - c. 27.69 acres in 2005 – covered in this letter.
3. Total financial assurance in effect for this site is now \$90,155.
4. Any future expansions will require a formal request submitted by Envirotech on an NMOCD Form C-137, and may require a financial assurance increase

NMOCD approval of this expansion does not relieve Envirotech, Inc. of liability should its operations at this site prove harmful to public health or the environment. Nor does it relieve Envirotech, Inc. of its responsibility to comply with the rules and regulations of any other local, state or federal governmental entity.

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

NEW MEXICO OIL CONSERVATION DIVISION

Roger C. Anderson  
Environmental Bureau Chief

Copy: NMOCD, Aztec

*Not sent.  
Pending acceptable  
fund*

**ENVIROTECH INC.****FAX COVER SHEET****"PRACTICAL SOLUTIONS FOR A BETTER TOMORROW"**

TO: Ed Martin TITLE: \_\_\_\_\_  
COMPANY: OCD  
FAX: 505-476-3462 PHONE: \_\_\_\_\_  
RE: CD letter to Mr Brooks  
DATE: 6/20/06  
PAGES: 14 (INCLUDING COVER PAGE)  
PROJECT: \_\_\_\_\_  
CC: \_\_\_\_\_

**COMMENTS.**

1 pg with aerial map  
1 pg with overall landfarm

I'll get maps to you tomorrow - the 1<sup>st</sup> day  
of summer!

FROM THE DESK OF: April E. Pohl

Envirotech, Inc.

5796 US Highway 64, Farmington, NM 87401

Phone: (505) 632-0615 / Fax: (505) 632-1865

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 20, 2006

Mr. David K. Brooks  
Assistant General Counsel  
NM EMNRD, OCD  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Office: (505) 476-3440  
Fax: (505) 476-3462

RE: Cash Bond for Commercial Waste Management Facility  
In the Amount of \$18,385, dated August 3, 2005  
Permit Number NM-1-011  
Envirotech, Inc., Principal  
Merrill Lynch, Financial Institution

Dear Mr. Brooks:

We are in receipt of your letter dated February 2, 2006 regarding the above referenced Permit Number NM-1-011 and the financial assurance of a cash account with Merrill Lynch.

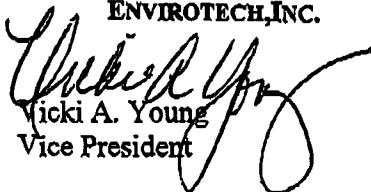
We spoke with Mr. Mike Lacey, Vice President in Farmington, New Mexico regarding the issue of Merrill Lynch's qualification under the rule in 19.15.9.711 NMAC. Mr. Lacey stated that both the Merrill Lynch Bank & Trust and the Merrill Lynch Bank USA is insured by the FDIC and backed by the U.S. Government to a maximum amount of \$100,000 for all deposits held in the same capacity per depository institution. The contact information for Mr. Lacey is attached if you have questions regarding Merrill Lynch.

We have attached for your review a copy of the Merrill Lynch security description document received upon the purchase of a \$19,000 certificate of deposit with Provident National Bank in Tilton, New Hampshire on August 10, 2005 and the Merrill Lynch Certificate of Deposit Fact Sheet. We request your review of these documents and let us know if the additional information qualifies this certificate of deposit as an acceptable institution.

We appreciate working with the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division and look forward to your favorable response.

Sincerely,

ENVIROTECH, INC.



Vicki A. Young  
Vice President

Copy: NMOCDD, Aztec

File:032006NMOCDD Expansion.doc



# Dr. Brill Lynch

ACCOUNT NUMBER	TRADE DATE	YOU BOUGHT	QUANTITY	PRICE
74E-11464	8/02/2005	BOUGHT	19000	100.000000

CD PROVIDIAN NATL BANK  
03.800% AUG 10 2006

**TILTON, WM  
WHEN ISSUED**

ISSUER HAS PAID ML A FEE OF 0.45%  
YIELD 3.80% TO 8/10/2006 INSURED TO FDIC LIMIT  
FACT SHEET ENCLOSED OR UNDER SEPARATE COVER  
INTEREST FROM 08/10/05 FIRST COUPON 02/10/06  
AS OF 08/01 ACTUAL/365 INTEREST DAY COUNT

ML7504 2005214 151 151  
VICKI A YOUNG AND  
MORRIS YOUNG JTWROS  
24 ROAD 5150  
BLOOMFIELD NM 87413

4251 E MAIN STREET SUITE B  
FARMINGTON NM 87401  
505-325-1080

**CHA**

EXECUTED O.T.C.  
WE ACTED AS AGENT

CUSIP# 74408BAL2  
F/C# 1009 SEC.# H85F3

Printing by recording of other materials purchased and delivery of securities or other financial instruments sold, or due to SETLEMENT DATE, unless otherwise indicated by a DATE DATE. Delivery on or before settlement date will avoid payment charges. Please provide this information for correct in purpose.

CODE 6832 (R2-03)

AMOUNT	19,000.00
PROCESSING FEE	
SEC. EXCH. COM/PA. FEE	
ACCRALED INTEREST/DIVIDEND	
CHARGE OR MARK-UP/DOWN	
NET AMOUNT	1,900.00
SETTLEMENT DATE	8/10/2005

IT IS AGREED BY WEEN, JERRILL LYNCH, MERF, FENNER & SMITH CO. (MLPF&S) AND ITS CLIENTS:

(1) That all transactions are subject to the constitution, rules, regulations, customs, usages, rulings and interpretations of the exchange or market, and its clearing house, if any, where the transactions are executed, and if not executed on any exchange, the National Association of Securities Dealers, Inc.

(2) That MLPF&S, unless and until all obligations of the client to MLPF&S are discharged, may from time to time, and without notice to the client, pledge or repledge, hypothecate or rehypothecate, any or all securities or other investment instruments, now or hereafter held, purchased or carried by MLPF&S for the account of the client or deposited to secure the same, either separately or under circumstances which will permit the commingling thereof with securities carried for the account of other clients, for any amount, whether, either more or less than the amount due MLPF&S thereon, whether under

• It is understood that the within and all other transactions made for your account by us contemplate natural receipt and delivery of the property for your account and payment therefor and that all property sold for your account is sold upon the representation that you have same in your possession actually or potentially. These transactions are made subject to the rules, regulations and customs of the board or exchange on which they are made and subject to any and all federal and/or state statutes to the extent that the same may be applicable thereto. The right is reserved by us to close transactions without further notice when, in our judgment, margins on deposit with us are below our requirements.

• If this transaction is a sale and the securities or other investment instruments are not already in our possession and do not represent a short sale, please forward them immediately to avoid possible premium payment on securities borrowed.

• Call features for municipal bonds may exist which could affect the yield; complete information will be provided upon request.

General: MLPF&S or otherwise or may lend the same or deliver the same on contracts for other clients without MLPF&S having in its possession and control for delivery a like amount of similar securities or other investment instruments.

(3) That we will hold for your account securities or other investment instruments purchased and the proceeds of sales unless instructed otherwise.

(4) That unless the client indicates non-acquiescence in writing, this agreement shall inure to the benefit of the successors of MLPF&S by merger, consolidation or otherwise and its assigns and MLPF&S is authorized to transfer the account of the client to any such successors or assigns.

(5) That bonds and preferred stocks which are callable in part and which we hold for clients (except for those in custodian accounts) are held in bulk segregation. In the event of a call, the securities to be called will be selected in an automated random selection in which the probability of a client's holdings being selected is proportional to the holdings of all clients of such securities held by us.

• MLPF&S trades for its own account as a block positioner and/or arbitrageur, and at the time of your transaction it may have had either a long or short position in this security which may have been partially or completely hedged.

• For reported securities, unless otherwise indicated, price is reported price.

• MLPF&S is a market maker and dealer for its own account in odd-lots, convertible bonds, preferred stock and in transactions executed on the Cincinnati Stock Exchange.

• The foreign currency conversion may have been effected by or through MLPF&S, or one of its affiliates, which may have profited in connection with such conversion.

• Where a foreign currency is indicated in the security description, information provided with respect to principal, interest, dividend and/or yield is subject to fluctuation in applicable foreign currency exchange rates and costs.

• For clients who choose to convert from the currency in which the security or payment thereon is

(6) That if shares loaned for a short sale are no longer available, we reserve the right to decide, by random selection, which positions will be subject to a buy-in.

(7) The responsibility for failure to cancel an existing open order rests with the client. Clients should be particularly mindful of this when entering a substitute order. Any transactions which result from the execution of any orders which the client has not instructed us to cancel will be entered in the client's account.

(8) When a security is "ex-dividend" for an ordinary cash dividend or interest, buy, sell, stop and sell stop limit types of orders will be reduced by the amount of the dividend unless otherwise specified. When a security is "ex-rights" or "ex-distribution," such orders will be reduced without exception. Sell, buy stop, and buy stop limit types of orders are unaffected.

(9) This confirmation shall be deemed conclusive if not objected to in 10 days.

denominated, information provided with respect to principal, interest, dividend, and/or yield is subject to fluctuation in applicable foreign currency exchange rate(s) and costs.

• Transactions executed in overseas markets on behalf of our clients may have been effected with an affiliate of MLPF&S.

• Name of other party to transaction and time of execution will be furnished upon request.

The following applies only if the front of this document indicates see A or B on the reverse side:

A-This transaction was effected through a specialist which is our affiliate in connection with its market making activity. Such specialist may have a long or short position in this stock or in options on this stock and may be on the other side of public orders executed on the exchange. Such specialist may have profited or lost in connection with this transaction.

B-This order has been placed with a specialist which is our affiliate.



*The information contained herein may not be modified by any oral representation made prior or subsequent to the purchase of your CD.*

## **CERTIFICATE OF DEPOSIT FACT SHEET**

The certificates of deposit ("CDs") described below are made available through Merrill Lynch, Pierce, Fenner & Smith Incorporated, referred to herein as "Merrill Lynch." Each CD is a deposit obligation of a depository institution domiciled in the U.S., the deposits and accounts of which are insured by the Federal Deposit Insurance Corporation (the "FDIC") within the limits described below.

Banks and savings associations that issue CDs through Merrill Lynch have represented to us that they are eligible to do so under the applicable provisions of the Federal Deposit Insurance Corporation Insurance Act of 1991 ("FDICIA") and the Federal Deposit Insurance Act (the "FDI Act"). Merrill Lynch does not guarantee in any way the financial condition of any depository institution.

To the extent affiliated depository institutions of Merrill Lynch, including Merrill Lynch Bank USA and Merrill Lynch Bank & Trust Co. (the "Affiliates"), issue CDs, such CDs are obligations of the issuing Affiliates only and are not obligations of Merrill Lynch, Merrill Lynch & Co., Inc. or any other affiliated company.

The extent of, and limitations on, federal deposit insurance are discussed below in the section headed "Deposit Insurance."

### **Terms of CDs**

Your Merrill Lynch financial advisor will inform you of the maturities, rates of interest and interest payment terms currently available. Both interest-bearing CDs and zero-coupon CDs may be available. You should review carefully the trade confirmation and any supplement to this Fact Sheet for a description of the terms of the CD. You should also review the investment considerations discussed below in "Important Investment Considerations."

Interest-bearing CDs are made available in minimum denominations and increments of \$1,000, up to \$100,000 in the aggregate per depositor in any depository institution. Interest-bearing CDs are generally offered in a wide range of maturities and bear interest at a fixed rate or at a floating rate based on a specified index or indices. If you purchase a CD with a rate of interest linked to an index, a CD that changes its rate during the life of the CD, or a CD that is subject to early redemption by the issuer, details concerning such provisions will be noted on the trade confirmation or, if applicable, in a separate Fact Sheet. Zero-coupon CDs do not bear interest, but rather are issued at a substantial discount from the face or par amount (the "principal") the minimum amount of which is \$1,000. The principal is paid at maturity. Interest, where applicable, and principal payments on CDs are automatically credited to your Merrill Lynch account.

Unless otherwise specified in the confirmation, interest earned on fixed rate interest-bearing CDs with original maturities of one year or less will be paid at the maturity of such CDs. Unless otherwise specified in the confirmation, interest earned on interest-bearing CDs with original maturities of more than one year will be paid semiannually. The rate on floating rate CDs will be set periodically and interest will be paid monthly, quarterly, semiannually, or annually as specified on your trade confirmation. If an interest payment date falls on a day that is not a business day, interest will be paid on the next succeeding business day, but no additional interest will accrue after such interest payment date. A "business day" shall be a day on which Merrill Lynch and the banks in both the depository institution's domicile and New York are open for business. For specific rate information for any interest period, please contact your Merrill Lynch financial advisor.

You should compare the rates of return and other features of the CDs to other available investments before deciding to purchase a CD. The rates paid with respect to the CDs may be higher or lower than the rates available on other deposits directly from the issuing depository institutions or through other deposit brokers.

## Evidence of the CDs

The CDs are evidenced by one or more master certificates issued by the depository institution, each representing a number of individual CDs. These master certificates are held by The Depository Trust Company ("DTC"), a limited purpose trust company that is in the business of performing such custodial services. No evidence of ownership, such as a passbook or a certificate, will be provided to you. Merrill Lynch keeps records of the ownership of each CD and will provide you with a written confirmation of your purchase. You will also be provided with an account statement which will reflect your CD ownership. You should retain the confirmation and the account statement(s) for your records. Because you will not be provided with a certificate evidencing your CD, the purchase of a CD is not recommended for persons who wish to take physical possession of a certificate.

Each CD constitutes a direct obligation of the issuing depository institution and is not, either directly or indirectly, an obligation of Merrill Lynch. You will have the ability to enforce your rights in a CD directly against the issuing depository institution. No deposit relationship shall be deemed to exist prior to the receipt and acceptance of your funds by the issuing depository institution.

If you choose to remove Merrill Lynch as your agent with respect to your CD, you may (i) transfer your CD to another agent, provided that the agent is a member of DTC (most major brokerage firms are members; many bank and savings institutions are not) or (ii) request of Merrill Lynch that your ownership of the CD be evidenced directly on the books of the depository institution, subject to applicable law and the depository institution's terms and conditions, including those related to the manner of evidencing CD ownership. A CD established directly on the books of the depository institution may lose its negotiability.

## Important Investment Considerations

**Limited Liquidity.** CDs are most suitable for purchasing and holding to maturity. If you wish to dispose of your CD prior to maturity, the price you receive will reflect prevailing market conditions and your sales proceeds may be less than the amount you paid for your CD. You should read with special care the sections headed "Additions and Withdrawals" and "Secondary Market."

**Insolvency.** A CD issuer may become under-capitalized, in which case the risk of insolvency of the issuing depository institution is heightened. See the section headed "Deposit Insurance."

Some institutions may be placed in a regulatory conservatorship with the FDIC typically appointed as conservator. The conservator is responsible for minimizing operating losses, limiting growth and ensuring that operations are conducted in a safe and sound manner. Notwithstanding the conservator's goal to preserve the institution's assets and preserve banking services to depositors, CDs of institutions for which the conservator has been appointed may be transferred to another institution, which has the right either (i) to lower the rate or otherwise change the terms of your CD, or (ii) to pay off your CD prior to maturity. If such institution determines to lower the rate or otherwise change the terms of your CD, you have the option to request instead that your CD be paid off. A payoff of your CD may occur at a time when the rates of interest on other available certificates of deposit are lower than the rate of interest on your CD being paid off. See the section headed "Payments under Adverse Circumstances."

**Compare Features.** You should compare the rates of return and other features of the CDs to other available investments before deciding to purchase a CD. The rates paid with respect to the CDs may be higher or lower than the rates on deposits or other instruments available directly from the depository institution or through Merrill Lynch.

**SEC Investor Tips.** The Securities and Exchange Commission periodically publishes tips for investors on various financial products, including CDs, on its website. You may access these investor tips at [www.sec.gov/investor/pubs/certific.htm](http://www.sec.gov/investor/pubs/certific.htm).

**FDIC Information.** The Federal Deposit Insurance Corporation has a wealth of information about deposit insurance, financial institutions and related topics on its website at [www.fdic.gov](http://www.fdic.gov).

## Deposit Insurance

Your CDs are insured by the FDIC, and backed by the U.S. Government to a maximum amount of \$100,000 (including principal and interest) for all deposits held in the same capacity per depository institution. Any accounts or deposits you

may maintain directly with a particular depository institution or through any other intermediary in the same capacity as you maintain your CDs would be aggregated with the CDs for purposes of the \$100,000 limit. In the event an issuing depository institution fails, interest-bearing CDs are insured, up to the \$100,000 limit, for principal and interest, accrued to the date of the issuing depository institution's closure. Zero-coupon CDs are insured to the extent of the original offering price plus interest at the rate quoted to the depositor on the original offering, accreted to the date of the closing of the depository institution. The original offering price plus the accreted interest is hereafter called "accreted value."

**YOU ARE RESPONSIBLE FOR MONITORING THE TOTAL AMOUNT OF ALL YOUR DEPOSITS (INCLUDING CERTIFICATES OF DEPOSITS, SAVINGS ACCOUNTS, MONEY MARKET DEPOSIT ACCOUNTS, ETC.) THAT YOU HOLD IN ANY ONE DEPOSITORY INSTITUTION IN ORDER FOR YOU TO DETERMINE THE EXTENT OF INSURANCE COVERAGE AVAILABLE TO YOU ON YOUR DEPOSITS, INCLUDING THE CDS. MERRILL LYNCH IS NOT RESPONSIBLE FOR ANY INSURED OR UNINSURED PORTION OF THE CDS OR ANY OTHER DEPOSITS.**

If your CDs or other deposits at the issuing depository institution are assumed by another depository institution pursuant to a merger or consolidation, such CDs or deposits will continue to be separately insured from the deposits that you might have established with the acquirer until (i) the maturity date of the CDs or other time deposits which were assumed, or (ii) with respect to deposits which are not time deposits, the expiration of a six-month period from the date of the acquisition. Thereafter, any deposits assumed by the surviving depository institution would be aggregated with existing and future deposits at the surviving depository institution for purposes of federal deposit insurance.

In the event that a CD is purchased in the secondary market at a premium over the par amount (or accreted value in the case of a zero-coupon CD), that premium is not insured. Therefore, if insurance payments become necessary for the depository institution that issued the CD, the CD holder can incur a loss of up to the amount of the premium paid for the CD. See the section headed "Secondary Market."

The application of the \$100,000 federal deposit insurance limitation to deposits, including CDs, is illustrated by several common situations discussed below.

**Individual Customer Accounts.** Funds owned by an individual and held in an account in the name of an agent or nominee of such individual (such as the CDs held in a Merrill Lynch account) are not treated as owned by the agent or nominee, but are added to other deposits of such individual held in the same capacity (including funds held in a sole proprietorship) and are insured up to \$100,000 in the aggregate.

**Custodial Accounts.** Funds in accounts held by a custodian (for example, under the Uniform Gifts to Minors Act) are not treated as owned by the custodian, but are added to other deposits of the minor or other beneficiary held in the same capacity and are insured up to \$100,000 in the aggregate.

**Corporate, Partnership and Unincorporated Association Accounts.** Funds in accounts owned by corporations (including subchapter S corporations), partnerships and unincorporated associations, operated for a purpose other than to increase deposit insurance, are added together with other deposits owned by such corporation, partnership and unincorporated association, respectively, and are insured up to \$100,000 in the aggregate.

**Joint Accounts.** An individual's interest in funds in all accounts held under any form of joint ownership valid under applicable state law may be insured up to \$100,000 in the aggregate, separately and in addition to the \$100,000 allowed on other deposits individually owned by any of the co-owners of such accounts (hereinafter referred to as a "Joint Account"). For example, a Joint Account owned by two persons would be eligible for insurance coverage of up to \$200,000 (\$100,000 for each person), subject to aggregation with each owner's interests in other Joint Accounts at the same depository institution. Joint Accounts will be insured separately from individually owned accounts only if each of the co-owners is an individual person, has signed an account agreement with Merrill Lynch and has a right of withdrawal on the same basis as the other co-owners. In the event of the death of one of two co-owners of a Joint Account, beginning six months after the death of the depositor, all the funds would be treated as individually held by the surviving co-owner and would, therefore, be aggregated with all other individually owned deposits of such survivor for insurance purposes. See the section headed "Deposit Insurance -- Treatment of Accounts Upon Death of Owner."

**Revocable Trust Accounts.** Funds held in an account in which the owner evidences an intent that at his or her death the funds shall belong to one or more individuals (frequently referred to as a "totten trust" account, "payable upon death" account or other type of revocable trust account, as determined under applicable state law) will be aggregated with other funds of the owner held in an individual capacity at the depository institution and insured up to a maximum of \$100,000. Revocable trust accounts will be insured for up to \$100,000 as to each named beneficiary, separately from another account of the owner or the beneficiary, provided that: (i) the account records for the deposit evidence an intention that upon the death of the owner the funds will belong to the owner's spouse, or to one or more parents, siblings, children or grandchildren and (ii) the beneficiaries of the revocable trust are specifically named in the account records for the deposit. However, a revocable trust account established by a husband and wife that names the husband and wife as sole beneficiaries will be treated as a joint account, and will be aggregated with other joint accounts subject to the rules described above under "Joint Accounts." A living trust is a formal revocable trust over which the owner retains ownership and control of the assets and designation of beneficiaries during his or her lifetime. Living trusts are subject to special rules, which you should review carefully in order to determine the available deposit insurance coverage.

**Irrevocable Trust Accounts.** Funds in an account established pursuant to one or more irrevocable trust agreements created by the same grantor (as determined under applicable state law) will be insured for up to \$100,000 for the interest of each beneficiary, provided that the beneficiary's interest in the account is non-contingent (i.e., capable of determination without evaluation of contingencies). Coverdell education savings accounts will be treated as irrevocable trust accounts for deposit insurance purposes. The deposit insurance of each beneficiary's interest is separate from the coverage provided for other accounts maintained by the beneficiary, the grantor, the trustee or other beneficiaries. The interest of a beneficiary in irrevocable trust accounts at a depository institution created by the same grantor will be aggregated and insured up to \$100,000.

**Retirement Plans and Accounts - Generally.** You may have interests in various retirement plans and accounts that are holding the CDs of a depository institution. The amount of deposit insurance you will be entitled to will vary depending on the type of plan or account and on whether CDs held by the plan or account will be treated separately or aggregated with the CDs of the same depository institution held by other plans or accounts. It is therefore important to understand the type of plan or account holding the CD. The following sections entitled "Individual Retirement Accounts," "Pass-Through Deposit Insurance for Employee Benefit Plan Deposits" and "Aggregation of Retirement Plan and Account Deposits" generally discuss the rules that apply to deposits of retirement plans and accounts.

**Individual Retirement Accounts.** CDs of one depository institution held in an individual retirement account (an "IRA"), including traditional, Roth, SEP and simple IRAs, are insured up to \$100,000 in the aggregate. However, CDs of one depository institution held in an IRA will be aggregated with CDs of the same depository institution held by certain employee benefit plans in which the owner of the IRA has an interest. See "Aggregation of Retirement Plan and Account Deposits" below. Thus, the owner of an IRA will only be entitled to insurance of \$100,000 for deposits of the same depository institution held in plans and accounts that are subject to aggregation.

**Treatment of Accounts Upon Death of Owner.** Under certain circumstances, if you become the owner of CDs or other deposits at a depository institution because another depositor dies, beginning six months after the death of the depositor, the FDIC will aggregate those deposits for purposes of the \$100,000 limit with any other CDs or deposits that you own in the same capacity at the depository institution. Examples of accounts that may be subject to this FDIC policy include joint accounts, "payable on death" accounts and certain trust accounts. The FDIC provides the six month "grace period" to permit you to restructure your deposits to obtain the maximum amount of deposit insurance for which you are eligible.

**Pass-Through Deposit Insurance for Employee Benefit Plan Deposits.** Subject to the limitations discussed below, under FDIC regulations, an individual's non-contingent interest of up to \$100,000 in the deposits of one depository institution held by various types of plans are eligible for insurance on a "pass-through" basis. This means that, instead of an employee benefit plan's deposits at one depository institution being entitled to only \$100,000 of insurance in total per depository institution, each participant in the employee benefit plan is entitled to insurance of his or her interest in the employee benefit plan's deposits of up to \$100,000 per institution (subject to the aggregation of the participant's interests in different plans, as discussed below). The pass-through insurance provided to an individual as an employee benefit plan participant is in addition to the \$100,000 per depository institution allowed on other deposits held by the individual at the issuing institution.

A deposit held by an employee benefit plan that is eligible for pass-through insurance is not insured for an amount equal to the number of plan participants multiplied by \$100,000. For example, assume an employee benefit plan owns \$200,000 in CDs at one institution and the plan has two participants, one with a vested non-contingent interest of \$170,000 and one with a vested non-contingent interest of \$30,000. In this case, the employee benefit plan's deposit would be insured up to only \$130,000; the individual with the \$170,000 interest would be insured up to the \$100,000 limit, and the individual with the \$30,000 interest would be insured up to the full value of such interest.

The contingent interests of employees in an employee benefit plan and overfunded amounts attributed to any employee defined benefit plan are not insured on a pass-through basis. Any interests of an employee in an employee benefit plan deposit which are not capable of evaluation in accordance with FDIC rules (i.e., contingent interests) will be aggregated with the contingent interests of other participants and insured up to \$100,000. Similarly, overfunded amounts are insured, in the aggregate for all participants, up to \$100,000 separately from the insurance provided for any other funds owned by or attributable to the employer or an employee benefit plan participant.

Under federal law, whether an employee benefit plan deposit is entitled to pass-through deposit insurance coverage is based, in part, on (i) the type of employee benefit plan involved and (ii) the capital status of the insured institution at the time each deposit is made. These factors are discussed in detail below.

**Types of Employee Benefits Plans.** The types of plans for which deposits may receive "pass-through" treatment are employee benefit plans, as defined in Section 3(3) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), including "Keogh Plans" of owner-employees described in Section 401(d) of the Internal Revenue Code of 1986, as amended, whether or not they are technically "employee benefit plans" under ERISA ("ERISA Plans") and deferred compensation plans for certain employees of state or local governments or tax-exempt organizations ("Section 457 plans"). (Collectively, ERISA Plans and Section 457 Plans are referred to herein as "Plans.") An ERISA Plan eligible for pass-through treatment includes a tax-qualified pension, profit-sharing or stock bonus plan, a governmental plan or a church plan.

**Capital Status of the Issuing Depository Institution.** Pass-through deposit insurance coverage is not provided if, at the time a Plan deposit is accepted by a depository institution, the institution is not eligible to accept brokered deposits (i.e., deposits placed by an intermediary such as Merrill Lynch) under applicable FDIC regulations, subject to the limited exception described in the following paragraph. In general, whether a depository institution may accept brokered deposits depends upon the institution's capital level. The federal banking regulators have established categories to reflect an institution's capital level. If a depository institution's capital category is either "well capitalized," or is "adequately capitalized" and the institution has received the necessary brokered deposit waiver from the FDIC, then the institution may accept brokered deposits. If a depository institution either is "adequately capitalized" without a waiver from the FDIC or is in a capital category below "adequately capitalized," then the depository institution may not accept brokered deposits.

This general rule on the availability of pass-through insurance coverage for employee benefit plan deposits is subject to an exception if (i) the depository institution is "adequately capitalized" but is not permitted to accept brokered deposits and (ii) the depositor receives a written statement from the institution indicating that such deposits are eligible for insurance coverage on a pass-through basis.

**Written Statement.** In order to assist plans in determining the availability of pass through deposit insurance, FDIC regulations require a depository institution to provide to persons administering or managing a Plan a written statement that includes both the institution's capital category and a representation regarding the availability of pass-through deposit insurance. Each issuing depository institution is required to provide the written statement on the master certificate evidencing the CDs at the time the deposits are made.

**Merrill Lynch does not verify the accuracy of such written statement.** In the event that a depository institution fails, the FDIC could elect to deny pass-through deposit insurance for Plan deposits if the representations of the depository institution to the Plan's administrator or manager were false when the plan deposit was made. If the requirements for pass-through deposit insurance were not met, coverage would be limited to \$100,000 per Plan, rather than per Plan participant. If a denial of pass-through treatment would be significant for a Plan, the Plan may wish to limit its deposits in one depository institution to \$100,000.

**Aggregation of Retirement Plan and Account Deposits.** Under FDIC regulations, an individual's interests in Plans maintained by the same employer or employee organization (e.g., a union) which are holding deposits at the same institution will be insured for \$100,000 in the aggregate. In addition, under FDIC regulations, an individual's interest in the deposits of one depository institution held by (i) IRAs, (ii) Section 457 Plans, (iii) self-directed Keogh Plans and (iv) self-directed defined contribution plans that are acquired by these plans and accounts on or after December 19, 1993 will be insured for \$100,000 in the aggregate, whether or not maintained by the same employer or employee organization. Deposits acquired by these plans and accounts before December 19, 1993 will not be subject to aggregation.

**If you have questions about how your CDs will be insured, please contact your Financial Consultant. You may also obtain information by contacting the FDIC, Office of Consumer Affairs, by letter (550 17<sup>th</sup> Street, N.W., Washington, D.C. 20429); by telephone at 877-275-3342, 202-942-3100 or 800-925-4618 (TDD); by e-mail ([dcainternet@fdic.gov](mailto:dcainternet@fdic.gov)); or by visiting the FDIC website at [www.fdic.gov](http://www.fdic.gov).**

#### **Payments under Adverse Circumstances**

The records maintained by DTC and Merrill Lynch regarding ownership of CDs would be used to establish your eligibility for federal deposit insurance payments.

As with all deposits, if it becomes necessary for federal deposit insurance payments to be made on the CDs, there is no specific time period during which the FDIC must make available such insurance payments, although they attempt to do so as soon as practicable. Accordingly, you should be prepared for the possibility of an indeterminate delay in obtaining insurance payments. In addition, you may be required to provide certain documentation to Merrill Lynch and to the FDIC, such as affidavits and indemnities, before insurance payouts are released to you. For example, if you hold CDs as trustee for the benefit of trust participants, you may be required to furnish an affidavit to that effect. Further, if an issuing depository institution fails, its insured deposits may be transferred, subject to applicable insurance verification and limitations on federal deposit insurance, to another depository institution, redeemed without penalty prior to maturity, or have its rate reduced by the FDIC.

In the event that insurance payments become necessary for your CDs, the FDIC is required to pay the original par amount plus accrued interest (or the accreted value in the case of zero-coupon CDs) to the date of the closing of the relevant depository institution, as prescribed by law, and subject to the \$100,000 limitation. No interest or accreted value is earned on deposits from the time a depository institution is closed until insurance payments are received.

As explained above, the maximum \$100,000 deposit insurance coverage applies to the aggregate of the principal and interest for CDs maintained at the issuing depository institution together with, except as set forth below, the aggregate of any other deposits you may maintain in the same legal ownership category at the issuing depository institution.

Merrill Lynch will not be obligated to you for amounts not covered by deposit insurance nor will Merrill Lynch be obligated to make any payments to you in satisfaction of a loss you might incur as a result of (i) a delay in insurance payouts applicable to your CD, (ii) your receipt of a decreased interest rate on the reinvestment of the proceeds received as a result of the payment of the principal and accrued interest or the accreted value on a CD prior to the scheduled maturity in connection with the liquidation of an insured institution or (iii) payment in cash of the principal and accrued interest or the accreted value on your CDs prior to maturity in connection with the liquidation of an insured institution or the assumption of all or a portion of its deposit liabilities at a lower interest rate.

Please note that the amount of a payment on a CD which had been purchased at a premium in the secondary market is based on the original par amount (or, in the case of a zero coupon CD, its accreted value) and not on any premium amount. Therefore, you will lose up to the full amount of the premium as a result of such a payment. You should factor these possible delays and types of resolutions into your financial planning. Also, Merrill Lynch will not be obligated to credit your account with funds in advance of their payments to Merrill Lynch by the FDIC.

#### **Additions or Withdrawals**

No additions are permitted to be made to any CD. When you purchase a CD, you agree with the issuing depository institution to keep your funds on deposit for the term of the CD. Accordingly, **no early withdrawals of CDs will be available**, except in the event of death or adjudication of incompetence of the beneficial owner of a CD. If such an event



occurs, early withdrawals will be permitted in whole but not in part without penalty. The early withdrawal provisions applicable to your CD may be more or less advantageous than the provisions applicable to other deposits available from the depository institutions.

Pursuant to the Internal Revenue Code, the beneficiary of a traditional IRA (but not a Roth IRA) must begin making withdrawals from the IRA after age 70 ½. CDs held in an IRA are not eligible for early withdrawal simply because the beneficiary must begin making mandatory withdrawals from the IRA. IRA beneficiaries should purchase CDs with maturities that correspond to the mandatory withdrawal requirements or look to the secondary market for liquidity. See the section headed "Secondary Market."

In the event that a customer wishes to make an early withdrawal under the above limited circumstances, Merrill Lynch endeavors to obtain funds for the customer as soon as possible. However, Merrill Lynch will not advance funds in connection with early withdrawals and can give no assurances that payment will be made by a specified date.

### **Secondary Market**

Merrill Lynch, though not obligated to do so, may maintain a secondary market in the CDs after their settlement date. Merrill Lynch cannot provide assurance that you will be able to sell your CDs prior to their maturity. In addition, a secondary market for the CDs may be discontinued at any time without notice. If you wish to sell your CD prior to maturity and Merrill Lynch does not maintain a secondary market, Merrill Lynch may attempt to sell your CD in a secondary market maintained by another broker-dealer. Therefore, you should not rely on being able to sell your CDs for any benefits, including achieving trading profits, limiting trading or other losses, realizing income prior to maturity, or having access to proceeds prior to maturity.

In the event that a buyer is available at a time you attempt to sell your CD prior to its maturity, the price at which your CD is sold may result in a return to you which may differ from the yield which the CD would have earned had it been held to maturity, since the selling price for a CD in such circumstances will likely be based on a number of factors such as interest rate movements, time remaining until maturity, the issuer's creditworthiness and other market conditions. Also, the price you may pay for any such CD in the secondary market might include a mark-up established by Merrill Lynch. Similarly, the price at which a CD may be sold if a secondary market is available will reflect a mark-down retained by Merrill Lynch. **In the event you choose to sell a CD in the secondary market, you may receive less in sale proceeds than the original par amount of the CD.**

You may purchase a CD in the secondary market where the price paid may be less than the original purchase price. This will be particularly true if interest rates have risen since the time of the original transaction. Conversely, you may purchase a CD in the secondary market where the price may be more than the original price of the CD. In the event that a CD is purchased in the secondary market at a premium over the principal amount (or accreted value in the case of a zero-coupon CD), the premium is not insured. Therefore, if deposit insurance payments become necessary for the depository institution that issued the CD, the owner of a CD will incur a loss of up to the amount of the premium paid for the CD. (Also see section headed "Deposit Insurance.")

The uninsured premium being paid for an interest-bearing CD can be determined by subtracting the par amount of the CD, which appears as "Quantity" on your confirmation, from the amount paid, which appears as "Amount" on your confirmation. For example, if the "Amount" paid is \$1025.00 and the "Quantity" purchased is \$1000, then the uninsured premium is \$25.00 (i.e.,  $\$1025 - \$1000 = \$25$ ).

In the case of a zero-coupon CD purchased in the secondary market, the uninsured premium can initially be calculated by subtracting the accreted value from the "Amount" paid. This uninsured premium does, however, decline over time. The accreted value of a zero-coupon CD, which is based upon the original issue yield and price, can be obtained at the time of purchase from your Financial Consultant.

### **Fees**

Under the arrangements established by Merrill Lynch with the issuing depository institutions, Merrill Lynch will receive a placement fee from the issuing depository institution in connection with your purchase of a CD. Also, a CD sold in the secondary market may have been purchased from the issuing depository institution by Merrill Lynch upon issuance and held by Merrill Lynch until the secondary market sale. Except for a mark-up or mark-down in connection with secondary

market transactions and a handling fee, if any, disclosed on your confirmation, you will not be charged any commissions in connection with your purchase of a CD.

### **Federal Income Tax Consequences**

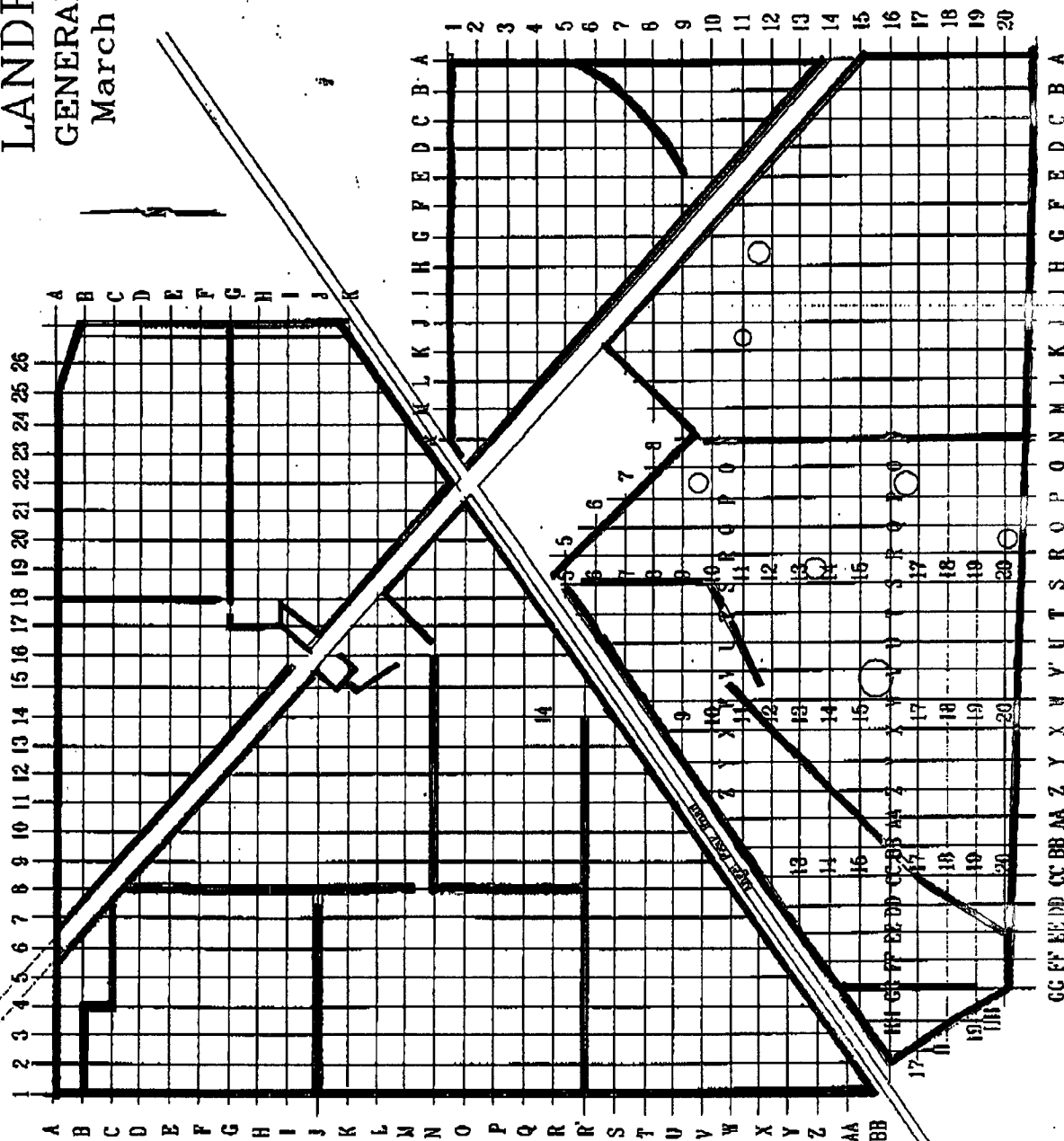
The following is a summary of the principal United States federal income tax consequences of the ownership of the CDs. The discussion below does not purport to deal with all of the federal income tax consequences applicable to all potential CD holders. Persons considering the purchase of the CDs should consult their own tax advisors regarding federal, state, local and any other income and estate tax laws applicable to their particular situations.

**United States Holders.** Interest paid on an interest-bearing CD is generally taxable each year as ordinary income to the beneficial owner thereof in accordance with the owner's method of accounting. A portion of the discount from face value of a zero-coupon CD will be taxable to the beneficial owner of the CD each year as ordinary interest income, even though the cash attributable to this discount is not received by the owner until the maturity of the CD. Notwithstanding these general rules, the tax liability on interest paid or discount accrued, as the case may be, on CDs held by traditional IRAs and Keogh Plans is postponed until actual distribution of the interest or discount accrued, as the case may be, to the beneficiaries of these plans. Interest income accumulates in a Roth IRA tax-free, and if certain criteria are met, distributions from the Roth IRA will not be taxed.

Merrill Lynch will, if applicable, provide you with an annual statement containing certain information relevant to the determination of the amount of interest or discount income with respect to your CDs upon which you will be taxed for the preceding year. In the case of CDs with a maturity of more than one year, a CD owner will realize gain or loss on the sale, early withdrawal, maturity or other disposition of a CD equal to the difference between (i) the amount received by the CD owner on the disposition of the CDs and (ii) the amount the owner paid to acquire the CD with such amount paid being increased in the case of a zero-coupon CD by the amount of the discount previously taxed to the owner with respect to the CD. In the case of a CD with a maturity of one year or less where interest is paid at maturity, any gain realized upon a sale or exchange prior to maturity will be treated as ordinary income to the extent of the holder's ratable share of the interest payable at maturity (i.e., the original issue discount inherent in such obligation). A holder should consult his or her tax advisor with respect to available alternative methods of calculating the amount of interest that would be accrued to the date of sale or exchange prior to maturity.

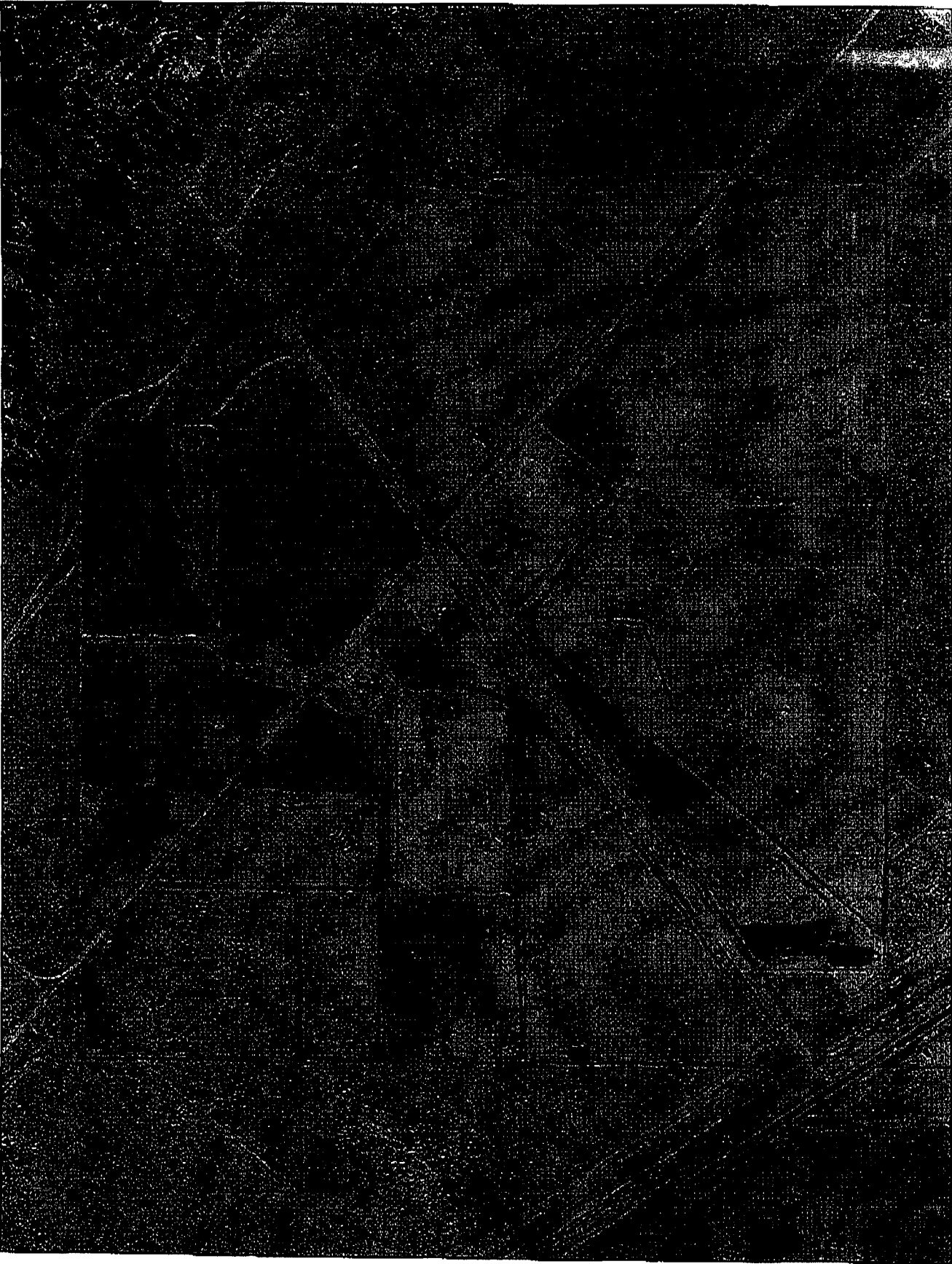
**Non-United States Holders.** Interest or discount income, as the case may be, paid on CDs beneficially owned by a non-resident alien or foreign corporation is not subject to any United States federal income or withholding tax, provided that this income is not effectively connected with the conduct by such foreign purchaser of a CD of a trade or business within the United States. Such interest or discount income will also be exempt from any United States information reporting or backup withholding requirements if the foreign purchaser of a CD provides Merrill Lynch, either directly or indirectly through a financial institution holding a CD as nominee for the foreign purchaser of a CD, with a form W-8 (or a substitute statement in a form substantially similar to the Form W-8) in which the foreign purchaser states his name and address and certifies, under penalties of perjury, that he or it is the beneficial owner of the CD and is not an individual citizen or resident of the United States or an entity formed in the United States, as the case may be. Any gain or income realized by a non-resident alien or foreign corporation upon the sale, early withdrawal, maturity or other disposition of a CD will not be subject to U.S. federal income or withholding tax if (i) such gain or income is not effectively connected with a trade or business in the United States of the foreign purchaser, and (ii) in the case of a foreign purchaser who is a non-resident alien, the non-resident alien is not present in the United States for 183 days or more in the taxable year of the disposition.

ENVIROTECH INC.  
LANDFARM #2  
GENERAL SITE MAP  
March 16, 1998



Topo USA® 8.0

DELOIRME



Scale 1:6,400  
1" = 533.3 ft Data Zoom 14-0

441113529

Data use subject to license.  
© 2006 DeLorme, Topo USA® 6.0.  
www.delorme.com

**Martin, Ed, EMNRD**

---

**From:** Martin, Ed, EMNRD  
**Sent:** Monday, January 23, 2006 9:10 AM  
**To:** 'Brandon Powell'  
**Cc:** Foust, Denny, EMNRD  
**Subject:** RE: Approval for 2nd Layer

Application of a second lift in this area is approved. I will send you a hard copy on Friday of this week or the first part of next.

*Ed Martin*

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

---

**From:** Brandon Powell [<mailto:bpowell@envirotech-inc.com>]  
**Sent:** Monday, January 23, 2006 9:11 AM  
**To:** Martin, Ed, EMNRD  
**Subject:** Approval for 2nd Layer

Ed-

Attached are the discontinued maintenance letters that I was able to find so far the rest of the letters or the original testing will be sent to you soon. We are requesting to be able to place a second lift in this area.

Thank you,  
Brandon Powell  
Landfarm Manager  
Envirotech Inc.  
Office # (505) 632-0615  
Fax # (505) 632-1865  
Cell # (505) 320-6431  
[bpowell@envirotech-inc.com](mailto:bpowell@envirotech-inc.com)

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

July 12, 2005

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

Phone (505) 476-3492  
Fax (505) 476-3462

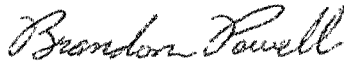
**RE: REQUEST FOR MODIFICATION OF PERMIT NM-01-0011, ENVIROTECH LANDFARM #2**

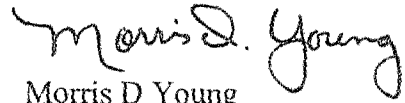
Dear Mr. Martin:

Envirotech Inc. respectfully requests modification of Permit NM-01-0011 to include an additional 32.1 acres ( see attached map) which was previously permitted and placed into closure status as per the attached letter dated April 18, 2000. However there was a misprint in section 14 of the letter, it states the closure south of line 20 when it should state north of line 20, because at the time of the letter there was no material placed south of line 20. This 32.1 acre parcel adjoins the current actively permitted area.

The wastes will be handled in accordance with our existing permit. Due to an increase in volume any thing that can be done to expedite this process would be greatly appreciated.

Respectfully Submitted,  
ENVIROTECH INC.

  
Brandon Powell  
Landfarm Manager  
[bpowell@envirotech-inc.com](mailto:bpowell@envirotech-inc.com)

  
Morris D Young  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

BJP:/Office/Client/LF/landfarm/10-6-04LF2PermitMod.doc.

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-137  
Revised June 10, 2003

Submit Original Plus 1  
Copy to Santa Fe  
1 Copy Appropriate  
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY

(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other  
☒ Solids/Landfarm ☐ Treating Plant

2. Operator: Envirotech Inc.

Address: 5796 U.S. Hwy 64, Farmington, New Mexico 87401

Contact Person: Brandon Powell or Morris Young Phone: (505) 632-0615

3. Location:        /4    NW    /4 Section   6   Township   26N   Range   10W    
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☒ Yes ☐ No
5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.
6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.
8. Attach a contingency plan for reporting and clean-up for spills or releases.
9. Attach a routine inspection and maintenance plan to ensure permit compliance.
10. Attach a closure plan.
11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.
12. Attach proof that the notice requirements of OCD Rule 711 have been met.
13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.
14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

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

Name: Morris D. Young

Title: President

Signature: Morris D. Young

Date: 07-12-05

E-mail Address: myoung@Envirotech-inc.com

**5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.**

This site is owned by: Morris D. Young.  
5796 US Hwy 64  
Farmington, New Mexico 87401

All adjacent land is owned by Morris D. Young or:  
Bureau of Land Management  
1235 La Plata Highway, Suite A  
Farmington, New Mexico 87401

**6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.**

See Attached Figures.

**7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.**

See Attached Figures.

**8. Attach a contingency plan for reporting and cleanup for spills or releases.**

The OCD Santa Fe and Aztec offices will be notified within 24 hours of the discovery of any spills or leaks or if any defect in the landfarm is noted. Any necessary repairs will be made as soon as possible after their discovery. If the integrity of the landfarm has been jeopardized, additional wastes will not be placed in the facility until repairs have been completed.

**9. Attach a routine inspection and maintenance plan to ensure permit compliance.**

The facility will be inspected no less than once every two weeks and following each consequential rainstorm or windstorm.



**10. Attach a closure plan.**

The OCD Santa Fe and Aztec offices will be notified when operation of the facility is to be discontinued for a period in excess of six (6) months or when the facility is to be dismantled. Within six (6) months after discontinuing use or within 30 days of deciding to dismantle the facility a closure plan will be submitted to the OCD Santa Fe office for approval. Envirotech will complete cleanup of constructed facilities and restoration of the facility site within six (6) months of receiving the closure plan approval.

Our closure plan includes the following procedures:

- a) No new material will be accepted.
- b) Existing landfarm soils will be remediated until they meet OCD standards.
- c) The treatment zone soils within each cell will be sampled at two (2) to three (3) feet below the native ground surface and will be analyzed for TPH, BTEX, major cations/anions, and WQCC metals.
- d) Contaminated soils exceeding OCD closure standards will be remediated.
- e) The facility will be contoured, seeded with native grasses, and allowed to return to its natural state.
- f) Closure will be subject to OCD requirements and applicable laws.

**11. Attach geological/hydrological evidence demonstrating that disposal of oilfield wastes will not adversely impact groundwater. Depth to and quality of groundwater must be included.**

The property is undeveloped ranch land that is uniquely suited for thin spread soil remediation. Envirotech's Landfarm #2 is located 1280 feet above groundwater. It is located on top of the Nacimiento Formation that overlies the Ojo Alamo Formation. The Nacimiento Formation extends approximately 1100 feet below the landfarm before meeting the Ojo Alamo Formation. The Nacimiento Formation is an effective aquatard due to the low permeability beds of mudstone and clay stone at the top of the formation and interbedded black, carbonaceous mudstones and white, coarse-grained sandstones in the lower part of the formation. The sandy loam, which covers the site, is an excellent absorbent. Background and quarterly monitoring at the site has shown that there is historically no migration of contamination from stabilized waste below 6 inches into native soil.

**12. Attach proof that the notice requirements of OCD Rule 711 have been met.**

The proposed expansion area adjoins our current facility on the south. This area previously underwent all notification and hearing procedures and was approved for expansion by the NMOCD. However, due to increased bond requirements in 2000, it was not included in our current permit. Since there have been no changes in property ownership near the facility we don't feel re-notification is necessary.

**13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.**

Haulers are not to deliver H<sub>2</sub>S containing materials to <sup>this</sup> ~~our~~ facility. In the event of a release, personnel will be evacuated to an upwind location until suitable PPE and monitoring equipment can be delivered to the site. *an unforseen*

**14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations, and orders.**

- The active portion of the facility will be fenced and bermed to prevent runoff and runoff.
- Disposal will occur only when an attendant is on duty. The facility will be secured when no attendant is present.
- All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
- Soils will be spread on the surface in lifts of six (6) inches or less.
- Moisture will be added as necessary to enhance bioremediation and to control blowing dust. No ponding or pooling of runoff water will be allowed.

ATTACHMENT TO OCD 711 PERMIT APPROVAL  
PERMIT NM-01-0011  
ENVIROTECH, INC.  
NW/4 of Section 6, Township 26 North, Range 10 West, NMPM  
San Juan County, New Mexico  
(April 18, 2000)

LANDFARM OPERATION

1. The 51-acre active portion of the facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty (50) feet and contain the following information: a) name of the facility; b) location by section, township and range; and c) emergency phone number.
2. Disposal may occur only when an attendant is on duty. The facility must be secured when no attendant is present.
3. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.
4. Soils must be spread on the surface in lifts of six inches or less.
5. Soils must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
6. Moisture may be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding, pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.
7. Contaminated soils may not be placed within twenty-five (25) feet of the boundary of the facility and the landfarm facility may not be constructed within one hundred (100) feet of adjacent landowners' property.
8. Contaminated soils may not be placed within twenty (20) feet of any pipeline crossing the landfarm. In addition, no equipment may be operated within ten (10) feet of a pipeline. All pipelines crossing the facility must have surface markers identifying the location of the pipelines.
9. The portion of the facility containing contaminated soils must be bermed to prevent runoff and runoff. A perimeter berm must be maintained such that it is capable of containing precipitation from a one-hundred year flood for the specific region. Individual interior berms must be maintained to control erosion.

10. All above-ground tanks, saddle tanks or drums located at the facility and containing materials other than fresh water must be placed on an impermeable pad with curb containment. The tanks and containers must be labeled as to contents and hazards.
11. Successive lifts of contaminated soils may not be spread until a laboratory measurement of total petroleum hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Envirotech may apply for alternate TPH levels. A request for alternate TPH levels must be accompanied by the cell designation and the reason for the request. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the Envirotech office at 5796 US Highway 64 Farmington, NM. Authorization from the OCD must be obtained prior to application of successive lifts and/or removal of the remediated soils.
12. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers requires prior approval from the OCD. Requests for application of microbes or fertilizers must include the location of the area designated for the program, the composition of additives, and the method, amount and frequency of application.
13. Any design changes to the landfarm facility must be submitted to the OCD Santa Fe office for approval and a copy must be sent to the Aztec District office.
14. As designated on maps submitted to the OCD, Envirotech must close the original (SE) portion of landfarm 2, unit 4, and unit 5 east of the N line and south of the 20 line by **December 31, 2000**. Closure of these portions of Landfarm 2 shall include:
  - a. Requesting and receiving closure status for all cells that have received discontinued maintenance status.
  - b. Requesting and receiving closure status for any currently active cells.
  - c. Removing berms, contouring, and seeding with native grasses.
  - d. Submittal of a closure report to the OCD Santa Fe office for review and approval.
15. Landfarm inspection and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm. The OCD Santa Fe and Aztec offices must be notified within 24 hours if any defect is noted. Repairs must be made as soon as possible. If the defect will jeopardize the integrity of the landfarm, additional wastes may not be placed into the landfarm until repairs have been completed.

LI

4

st. 4  
swc lf 5

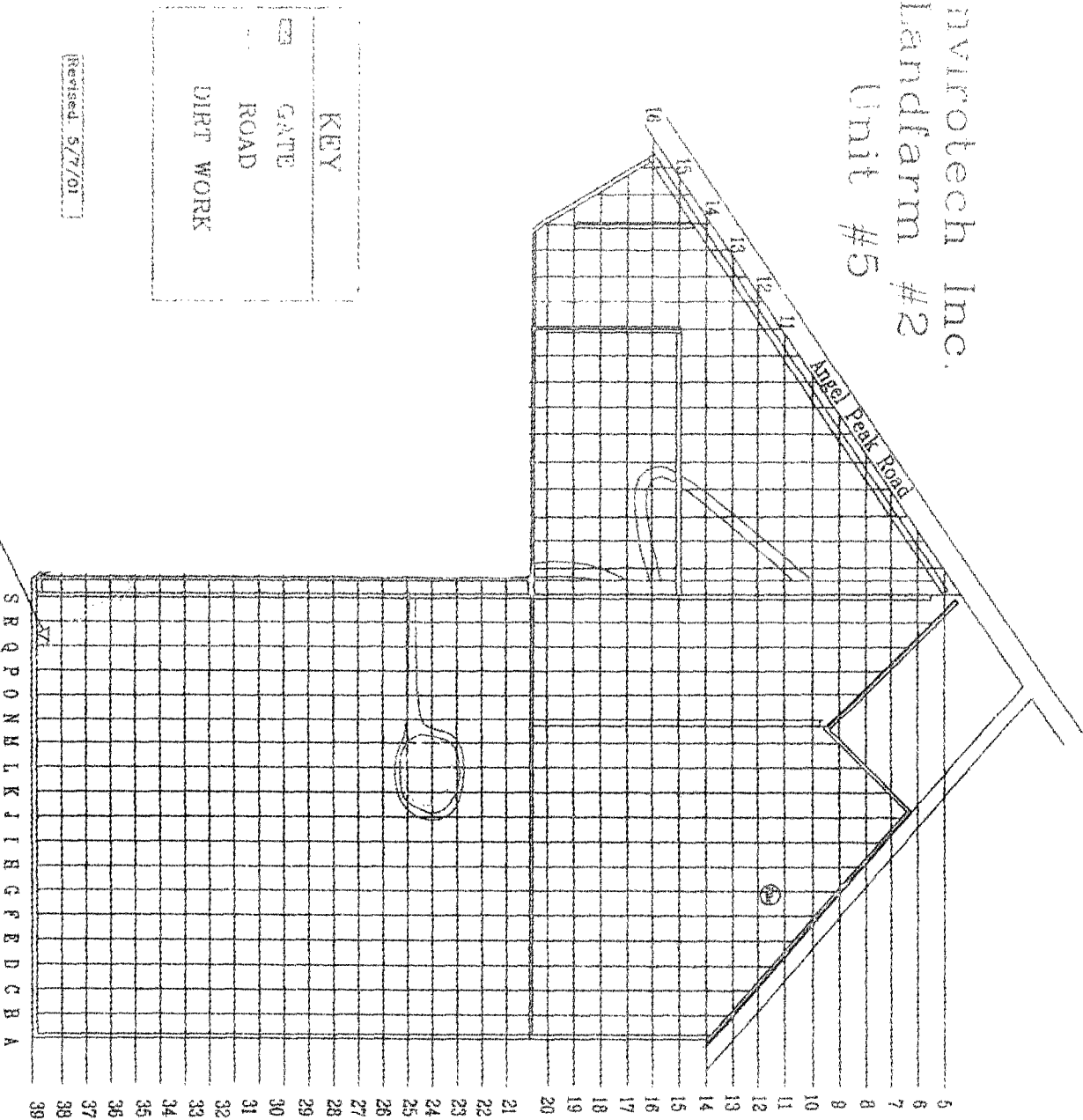
swc lf 5

st. 7 X

st. 6 X  
swc lf 5

32.1 a.  
LF 5

# Envirotech Inc. Landfarm #2 Unit #5



DIRT WORK REQUIRED FOR  
RUNOFF CONTROL



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

March 31, 2005

Mr. Brandon Powell  
Envirotech, Inc.  
5796 U.S. Highway 64  
Farmington, NM 87401

Dear Mr. Powell:

The New Mexico Oil Conservation Division has received your letter dated March 30, 2005 requesting permission to transport non-oilfield, and non-hazardous hydrocarbon contaminated soil across Envirotech's OCD-regulated facility (NM-1-0011) through an entrance which is common to both that facility and Envirotech's NMED-regulated facility.

This request is hereby approved. Please ensure that the attendant on duty is fully aware of the different requirements and the different types of waste that may be accepted at both of the facilities in question.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin  
Environmental Bureau

Cc: Denny Foust, NMOCD, Aztec

# ENVIROTECH INC.

IPRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 30, 2005

Mr. Edwin E. Martin  
NMOCD Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**RE: THE TRANSPORTATION OF CONTAMINATED SOIL ACROSS THE NMOCD REGULATED FACILITY TO THE NMED REGULATED FACILITY.**

Dear Mr. Martin:

Envirotech respectfully requests written permission to transport non-oilfield, and non-hazardous hydrocarbon contaminated soil across our OCD regulated facility, permit # NM-01-0011 for entrance into our New Mexico Environment Department (NMED) regulated facility, permit # DP-955.

The trucks transporting the contaminated soil will not leave the access roads inside of the OCD regulated facility and no material will be placed without the direct supervision of our landfarm attendant present to prevent any unauthorized dumping in the OCD regulated facility.

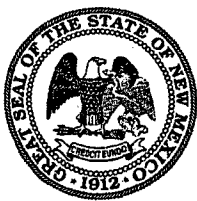
If you have any questions or concerns please contact us to resolve them.

Respectfully Submitted,  
ENVIROTECH, INC.



Brandon Powell  
Landfarm Manager  
[bpowell@envirotech-inc.com](mailto:bpowell@envirotech-inc.com)





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

7001 1940 0004 7920 7614

March 4, 2005

**Mark E. Fesmire, P.E.**  
Director  
**Oil Conservation Division**

Envirotech, Inc.  
5796 U.S. Highway 64  
Farmington, NM 87401

Permit Number: NM-1-0011

Re: Administrative Modification of Landfarm Permits

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

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

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

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

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

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

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

Very truly yours,

Mark E. Fesmire, P.E.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

November 5, 2004

Mr. Brandon J. Powell  
Envirotech, Inc.  
5796 U.S. Highway 64  
Farmington, NM 87401

Dear Mr. Powell:

The New Mexico Oil Conservation Division (NMOCD) has received Envirotech's request, dated September 30, 2004, to begin landfarming operations on an additional 27.5 acres at Envirotech's landfarm at Hilltop, NM. The NMOCD has also received the required additional financial assurance (\$18,835) for this expansion, which had been previously stipulated by NMOCD in its letter of April 18, 2000.

Your request to begin operations on the additional 27.5 acres is approved with the following conditions:

1. The additional acreage is to be operated according to the conditions placed on Envirotech's permit (NM-1-011) per NMOCD's approval letter dated September 17, 2002.
2. NMOCD understands that this is the second of three requests for expansion. These phased-in expansions were approved by NMOCD on August 27, 2003 with the understanding that each expansion would require additional financial assurance. Expansions were scheduled as follows:

- a. 27.5 acres in 2003 - financial assurance received
- b. 27.5 acres in 2004 - covered in this request - financial assurance received
- c. 27.69 acres in 2005 - to be commenced after request for expansion and financial assurance are received by the NMOCD

NMOCD approval of this expansion does not relieve Envirotech of liability should its operations result in pollution of surface water, groundwater, or the environment. Nor does it relieve Envirotech of its responsibility to comply with other federal, state or local laws and/or regulations.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roger C. Anderson  
Environmental Bureau Chief

cc: NMOCD, Aztec



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

September 17, 2004

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

Director

**Oil Conservation Division**

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

Dear Mr. Young:

Since the New Mexico Oil Conservation Division (NMOCD) promulgated Rule 50 covering pits and below-grade tanks, there has arisen a need, in certain circumstances, for operators to transport their drill cuttings off-site and dispose of them.

NMOCD Rule 711, as it pertains to landfarms, does not specifically address the issue of exempt oilfield wastes that may be contaminated with salts. Your landfarm application and permit were written with only hydrocarbon-contaminated soils in mind. Salt-contaminated wastes cause the following problems:

1. Lessening the effectiveness of the biodegradation capacity of your landfarm
2. Rapid leachability causing adverse effects on groundwater

If you want to accept salt-contaminated cuttings or any other salt-contaminated wastes, your 711 permit must be modified to ensure that your acceptance of those wastes will not adversely affect public health or the environment.

Please check one of the following:

☐ I have accepted or intend to accept salt-contaminated wastes in my landfarm. An OCD form C-137, applying for a modification to my 711 permit is attached. Included, as an attachment, is a demonstration that the accepted salt-contaminated soils will not adversely affect groundwater in the foreseeable future. (Closure requirements will also require modification to ensure the protection of groundwater. Should your acceptance of salt-contaminated wastes prove detrimental to groundwater, future liability for such damage rests with the landfarm operator).

☐ I do not intend to accept salt-contaminated wastes in my landfarm. Should this condition change, I will submit an OCD Form C-137 for a modification to my 711 permit at that time.

New Mexico Oil Conservation Division  
Attn: Ed Martin  
1220 S. St. Francis  
Santa Fe, NM 87505

This letter must be returned to the above address no later than October 31, 2004. An extension of time may be granted if you contact this office no later than that date.

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

Signed \_\_\_\_\_

Date \_\_\_\_\_

## ENVIROTECH INC. LANDFARM DISKING LOG

LANDFARM: #2

DATE	LF #	Cells Disked	Disked By	Comments
12-16-02	2	1-R-5,6,7,8	Theo Nez	All EL Paso cells
12-16-02	2	S-HH 9-20	Theo Nez	All L.F. #2
2-10-03	2	S-HH 9-20	Mike Hart	L.F. #2
2-11-03	2	S-HH 9-20	Mike Hart	All L.F. #2
3-25-03	2	7-R-5,6,7,8	Theo Nez	All EL Paso cells
4-16-03	#2	S-6-S-13	Theo Nez	1/2 EL Paso cells
5-28-03	#2	S-HH 9-20	Mike Hart	L.F. #2
5-2-03	#2	S-15-20 N-15-20	Theo Nez	EL Paso Cell
6-17-03	#2	S-15-20 N-15-8	Theo Nez	EL Paso cell
6-17-03	#2	Z-16-T-6	Theo Nez	Community cells
6-18-03	#2	CC-11-21/T-11-21	Theo Nez	Plow
7-01-03	#3	All of LF #3	Theo Nez	Plow
7-7-03	#2	Z-13-T-13	Theo Nez	disc
7-22-03	#2	CC-28- <del>CC-20</del> <sup>S-5</sup>	Tully Cantu	disc
7-27-03	#2	Z-14-6T	Tully Cantu	disc
7-30-03	#2	S-6-S-13	Tully Cantu	EL Paso cell
8-15-03	#3	1/2 of LF #3	Tully Cantu	1/2 LF #3

LANDFARM: #2

[illegible]

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

RECEIVED

AUG 18 2003

OIL CONSERVATION  
DIVISION

August 15, 2003

Ms. Martyne Kieling  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Phone (505) 476-3440  
Fax (505) 476-3462

**RE: PROPOSED MODIFICATION TO PERMIT NM-01-0011**

Dear Ms. Kieling:

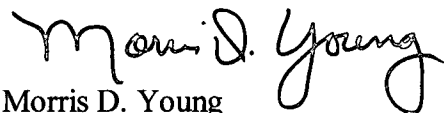
Envirotech Inc. is in receipt of your letter dated July 25, 2003, regarding the matter of past due financial assurance for our Landfarm Permit NM-01-0011. Due to the fact that the required bond or letter of credit must be irrevocable and can only be released by the NMOCD, Envirotech has been unsuccessful in obtaining a bond in the amount of \$55,155.00 as of this date.

In order to continue operating and open the expanded portion of the landfarm while meeting financial requirements, Envirotech proposes the following arrangement. Envirotech shall provide a Cash Deposit (CD) in the amount of \$18,385.00 in NMOCD's name. In turn, 27.5 acres of the expansion will be opened for operation in 2003. Envirotech will provide another CD in the same amount in 2004 and again in 2005, opening 27.5 and the remaining 27.69 acres respectively.

Should this arrangement meet your approval, you can be certain that no contaminated soil will be placed in any portion of the facility that is not currently covered by the financial assurance. If this arrangement is unacceptable, we request that you place the permit in suspension for six (6) months to allow us to get the financial assurances in place. During this suspension period no contaminated soil will be introduced into the expansion portion of the facility.

We hope that the proposed arrangement will be acceptable. Should you have any questions or further concerns, please do not hesitate to contact us at (505) 632-0615.

Sincerely,  
**ENVIROTECH INC.**



Morris D. Young  
President  
[myoung@envirotech-inc.com](mailto:myoung@envirotech-inc.com)

MDY:lrj/enviro/Landfarm/Correspondence/081503 Kieling.doc



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

July 25, 2003

**Lori Wrotenbery**

Director

Oil Conservation Division

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

**RE: Past Due Financial Assurance  
Envirotech, Inc. Permit NM-01-0011  
NW/4 of Section 6, Township 26 North, Range 10 West, NMPM  
San Juan County, New Mexico**

Dear Mr. Young:

The New Mexico Oil Conservation Division has previously contacted Envirotech, Inc. via several a phone calls regarding financial assurance. The most recent phone conversation was with Vickie Young on June 2, 3003. According to the schedule in Permit NM-01-0011, Envirotech, Inc. was required to submit financial assurance by October 17, 2002 to the amount of **\$90,155**. The financial assurance has now been past due for 9 months and 8 days. The OCD currently has \$35,000 on file for the Envirotech, Inc surface waste management facility. Envirotech, Inc has until **August 8, 2003** to submit the appropriate financial assurance or propose in writing a reduction of the unused permitted acreage of the landfarm facility, after which time I will be turning this matter over to the Oil Conservation Division's attorney for advisement.

Forms may be found on the OCD web site at <http://www.emnrd.state.nm.us/oed/> under Forms. If you have any questions please contact me at (505) 476-3488.

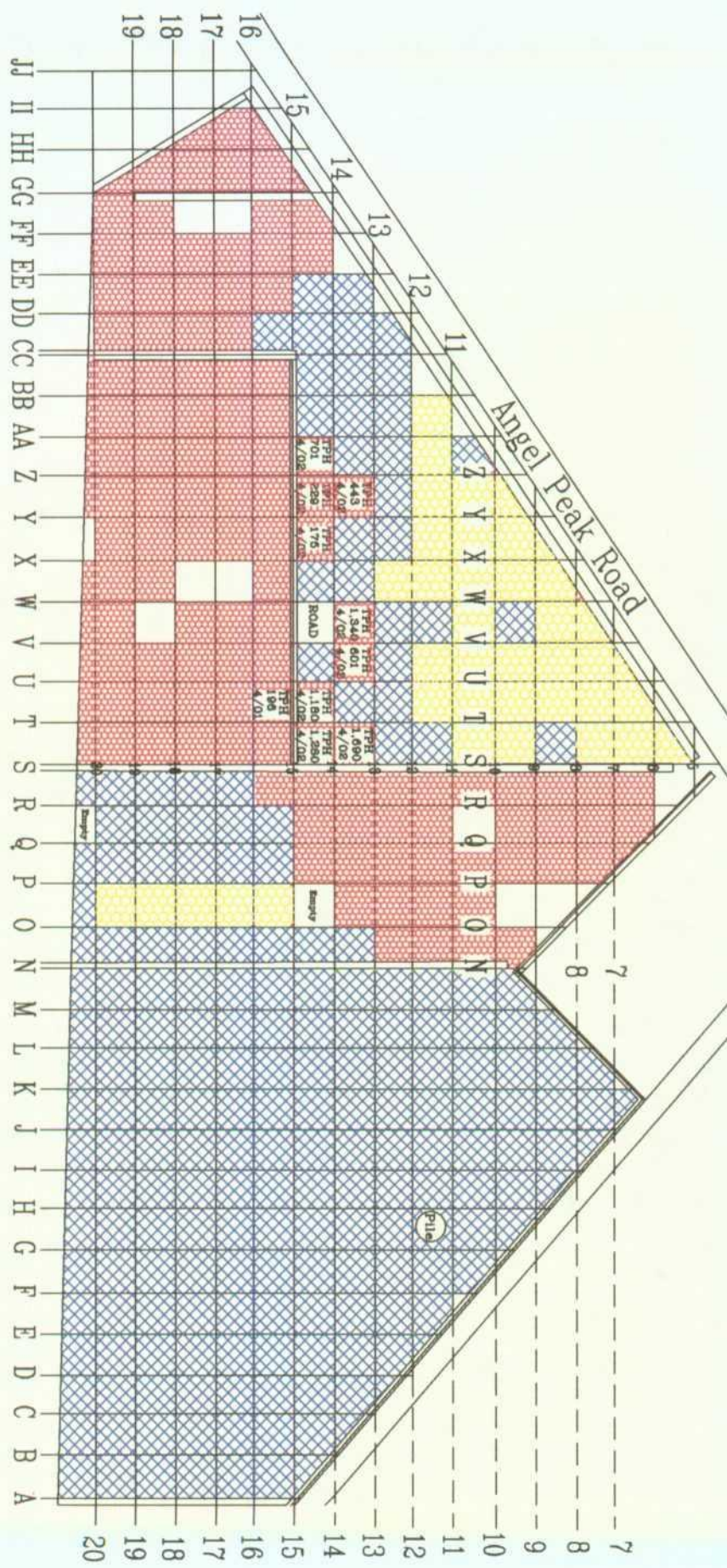
Sincerely,

Martyne J. Kielling  
Environmental Geologist  
xc

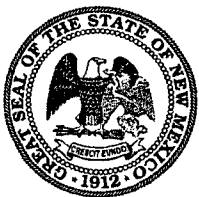
Aztec OCD Office



# Envirotech Inc. Landfarm #2 Unit #5



KEY	
	Closed by OCD
	Closed by Env.
	Open (Hot)
	2nd Lift
	Empty



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

April 2, 2003

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

**RE: OCD Rule 711 Permit NM-01-0011**  
**Envirotech, Inc.**  
**Commercial Landfarm #2**  
**Section 6, Township 26 North, Range 10 West, NMPM**  
**San Juan County, New Mexico**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) issued a permit modification on September 17, 2002 authorizing the expansion of the size of the landfarm. This permit approval was conditional upon the receipt and approval by the Director of financial assurance in the amount of \$90,155. The OCD currently has on file financial assurance in the amount of \$35,000. The remaining amount of \$55,155 was required by October 17, 2002. To date the OCD has not received the increased financial assurance.

This letter should serve as notice that Envirotech, Inc. is currently not authorized by permit to use the expansion area and is past due on the required financial assurance. Envirotech, Inc. has until April 30, 2003 to submit the required financial assurance.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling  
Environmental Geologist

Xc: Aztec OCD Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

Certified Receipt# 7002 2410 0006 6462 6367

April 1, 2003

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

**RE: Non-Compliance with OCD Rule 711 for Envirotech Land Farm #2**  
**OCD Permit NM-01-0011**  
**NW/4 Section 6-T26N-R10W**  
**San Juan County, New Mexico**

Dear Mr. Young:

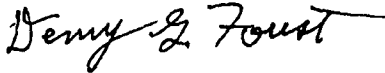
Recently the New Mexico Oil Conservation Division (OCD) has become aware of twenty-seven (27) instances in the 2002 calendar year that Envirotech Inc. (Envirotech) was not in compliance with OCD Permit NM-01-0011. Envirotech failed to comply with Rule 711. C. (4)(b) [19 NMAC 15.9.711. C. (4)(b)] which reads Non-Exempt, Non-Hazardous Oilfield Wastes: Prior to acceptance, a "Request For Approval To Accept Solid Waste", OCD Form C-138, accompanied by acceptable documentation to determine that waste is non-hazardous, shall be submitted to the appropriate District office. Acceptance will be on a case-by-case basis after approval from the Division's Santa Fe office.

- 1) In twenty-seven separate instances during calendar year 2002 Envirotech accepted Non-Exempt Non-Hazardous Oil Field Wastes at its Land Farm #2 facility without an approved OCD Form C-138.
- 2) Envirotech discovered the violations during an internal audit. This audit was in preparation for an informal annual review by OCD's District office.
- 3) During OCD's February 19, 2003, annual review, Envirotech and OCD personnel confirmed a total of twenty-seven (27) violations.
- 4) A verbal agreement was reached for Envirotech to correct these violations by submitting the proper paperwork and analysis as necessary by March 15, 2003.
- 5) Paperwork for twenty-six (26) violations were completed and filed by March 18, 2003.
- 6) The last set of paperwork was filed on March 28, 2003, due to delay in laboratory analysis for metals.
- 7) The paperwork for twenty-seven (27) violations are now completed and on file with OCD.
- 8) Envirotech voluntarily reported the violations to OCD.

Page 2  
Envirotech  
April 1, 2003

Envirotech's conduct warrants the issuance of a letter of "Non-Compliance". Envirotech discovered the violations thru an internal audit of Land Farm #2 operations. We suggest Envirotech conduct a quarterly internal review and audit of the Land Farm #2 activities to prevent a repeat of the 2002 situation

Yours truly,



Denny G. Foust  
Environmental Geologist  
[dfoust@state.nm.us](mailto:dfoust@state.nm.us)

DGF/mk

XC: Martyne Kieling, OCD Santa Fe  
Charlie Perrin, OCD Aztec  
DGF File  
Environmental File  
Landrea Jackson, Envirotech Farmington



*Risk Reduction & Environmental Stewardship Division  
Water Quality & Hydrology Group (RRES-WQH)*  
PO Box 1663, MS K497

Los Alamos, New Mexico 87545  
(505) 667-7969/Fax: (505) 665-9344

Date: November 14, 2002  
Refer to: RRES-WQH: 02-425

Mr. Harlan Brown  
Envirotech, Inc.  
5796 US Highway 64  
Farmington, New Mexico 87401

**SUBJECT: CERTIFICATE OF WASTE STATUS, FENTON HILL HOT DRY ROCK  
GEOTHERMAL FACILITY**

Dear Mr. Brown:

Per your request, enclosed is a completed and signed New Mexico Oil Conservation Division *Certificate of Waste Status* form for wastes from the 1-MG service pond at the Fenton Hill Hot Dry Rock Geothermal Facility.

Please contact me at (505) 667-7969 if you have any questions regarding this form.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Bob Beers'.

Bob Beers  
Water Quality & Hydrology Group

BB/tml

Enclosures: a/s

Cy: W. Price, NM/OCD, Santa Fe, NM, w/enc.  
M. Kieling, NM OCD, Santa Fe, NM, w/enc.  
J. Peterson, Santa Fe National Forest, Jemez Ranger District, Jemez Springs, NM, w/enc.  
C. Linn, Santa Fe National Forest, Santa Fe, NM, w/enc.  
J. Vozella, DOE/OLASO, w/enc., MS A316

Cy (continued):

G. Turner, DOE/OLASO, w/enc., MS A316  
P. Weber, EES-DO, w/enc., MS D446  
J. Hansen, EES-DO, w/enc., MS D446  
J. Thomson, EES-11, w/enc., MS D443  
B. Ramsey, RRES-DO, w/enc., MS J591  
K. Hargis, RRES-DO, w/enc., MS J591  
D. Stavert, RRES-EP, w/enc., MS J591  
A. Dye, RRES-SWRC, w/enc., MS K490  
S. Rae, RRES-WQH, w/enc., MS K497  
D. Rogers, RRES-WQH, w/enc., MS K497  
P. Wardwell, LC-ESH, w/enc., MS A187  
RRES-WQH File, w/enc., MS K497  
IM-5, w/enc., MS A150



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
AZTEC DISTRICT OFFICE  
1000 RIO BRAZOS ROAD  
AZTEC, NEW MEXICO 87410  
(505) 334-5178 Fax (505) 334-5171

GARY E. JOHNSON  
GOVERNOR

JENNIFER A. SALISBURY  
CABINET SECRETARY

## CERTIFICATE OF WASTE STATUS

<b>1. Generator Name and Address:</b> Los Alamos National Laboratory P.O. Box 1663 Los Alamos, NM 87545	<b>2. Destination Name:</b> Envirotech Soil Remediation Facility Landfarm #2 Hilltop, New Mexico
<b>3. Originating Site (name):</b> Fenton Hill Hot Dry Rock Geothermal Facility	<b>Location of the Waste (Street address &amp;/or ULSTR):</b> Sandoval County, NM
Attach list of originating sites as appropriate	
<b>4. Source and Description of Waste</b> The Hot Dry Rock Geothermal Project utilized a 1-MG Service pond to store geothermal fluids. In 1997 the pond was drained and cleaned. Since 1997 the pond has been used to store vented geothermal fluid from geothermal well EE-2A and ion exchange back flush water from the Milagro project. The addition of non-geothermal water from the Milagro project was conducted with OCD's permission and in accordance with NMOCD's mixture policy.	

I, Paul Weber representative for:  
(Print Name)  
Los Alamos National Laboratory do hereby certify that,  
according to the Resource Conservation and Recovery Act (RCRA) and Environmental Protection Agency's July,  
1988, regulatory determination, the above described waste is: (Check appropriate classification)

☒ **EXEMPT** oilfield waste      ☐ **NON-EXEMPT** oilfield waste which is non-hazardous by characteristic  
analysis or by product identification

and that nothing has been added to the exempt or non-exempt non-hazardous waste defined above.

For **NON-EXEMPT** waste the following documentation is attached (check appropriate items):

☐ MSDS Information      ☐ Other (description):  
☐ RCRA Hazardous Waste Analysis  
☐ Chain of Custody

This waste is in compliance with Regulated Levels of Naturally Occurring Radioactive Material (NORM) pursuant to 20 NMAC 3.1 subpart 1403.C and D.

Name (Original Signature): Paul Weber

Title: EES Division Director

Date: 14 Nov 02

**Kielling, Martyne**

---

**From:** Robert Beers [bbeers@lanl.gov]  
**Sent:** Thursday, November 07, 2002 8:03 AM  
**To:** WPrice@state.nm.us  
**Cc:** mkielling@state.nm.us; dkthomas@lanl.gov; stevenrae@lanl.gov; slug@lanl.gov; jchansen@lanl.gov; aferrell@fs.fed.us; clinn@fs.fed.us; A. Albert Dye  
**Subject:** Fenton Hill 1-MG Pond Closure

Dear Wayne,

Key Energy Services, Inc. has finished removing the geothermal fluids from the Fenton Hill Geothermal Facility's 1-MG pond. Today, they begin removing the sludge for disposal at Envirotech's land farm (Envirotech, Inc., is an OCD-permitted surface waste management facility in Farmington, NM (OCD Permit No. NM-01-0011)). Removal of the liners and the leak collection piping should be completed by early next week. The liners and leak collection piping will be disposed of at Waste Management's Solid Waste Facility in Rio Rancho, NM. Gravel from the leak collection system will be disposed of at Envirotech's land farm.

Soil sampling beneath the secondary liner could begin as early as next week.

Please contact me if you have any questions regarding these activities.

Sincerely,

Bob Beers

Bob Beers  
Environmental Surveillance Team  
Water Quality & Hydrology Group  
Los Alamos National Laboratory  
MS K497  
Los Alamos, NM 87545

email: bbeers@lanl.gov  
office: 505-667-7969  
fax: 505-665-9344

11/8/2002





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

October 28, 2002

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 #2  
Permit NM-01-0011  
NW 1/4, of Section 6, T. 26 North, R. 10 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 August 5, 2002 requesting discontinued maintenance status. Based on the information provided the following Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Unit 5 Cells**

Cell N-13	Cell N-20	Cell P-15	Cell Q-16	Cell R-18
Cell N-14	Cell O-15	Cell P-16	Cell Q-17	Cell R- 19
Cell N-15	Cell O-16	Cell P-17	Cell Q-18	Cell R-20
Cell N-16	Cell O-17	Cell P-18	Cell Q-19	Cell U-11
Cell N-17	Cell O-18	Cell P-19	Cell Q-20	
Cell N-18	Cell O-19	Cell P-20	Cell R-16	
Cell N-19	Cell O-20	Cell Q-15	Cell R-17	

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, local laws and/or regulations. If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling  
Environmental Geologist

xc: OCD Aztec Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Betty Rivera**  
Cabinet Secretary

October 28, 2002

**Lori Wrotenberg**

Director

**Oil Conservation Division**

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 #2  
Permit NM-01-0011  
NW 1/4, of Section 6, T. 26 North, R. 10 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 August 5, 2002 requesting discontinued maintenance status. Based on the information provided the following Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Unit 5 Cells**

Cell N-13	Cell N-20	Cell P-15	Cell Q-16	Cell R-18
Cell N-14	Cell O-15	Cell P-16	Cell Q-17	Cell R- 19
Cell N-15	Cell O-16	Cell P-17	Cell Q-18	Cell R-20
Cell N-16	Cell O-17	Cell P-18	Cell Q-19	Cell U-11
Cell N-17	Cell O-18	Cell P-19	Cell Q-20	
Cell N-18	Cell O-19	Cell P-20	Cell R-16	
Cell N-19	Cell O-20	Cell Q-15	Cell R-17	

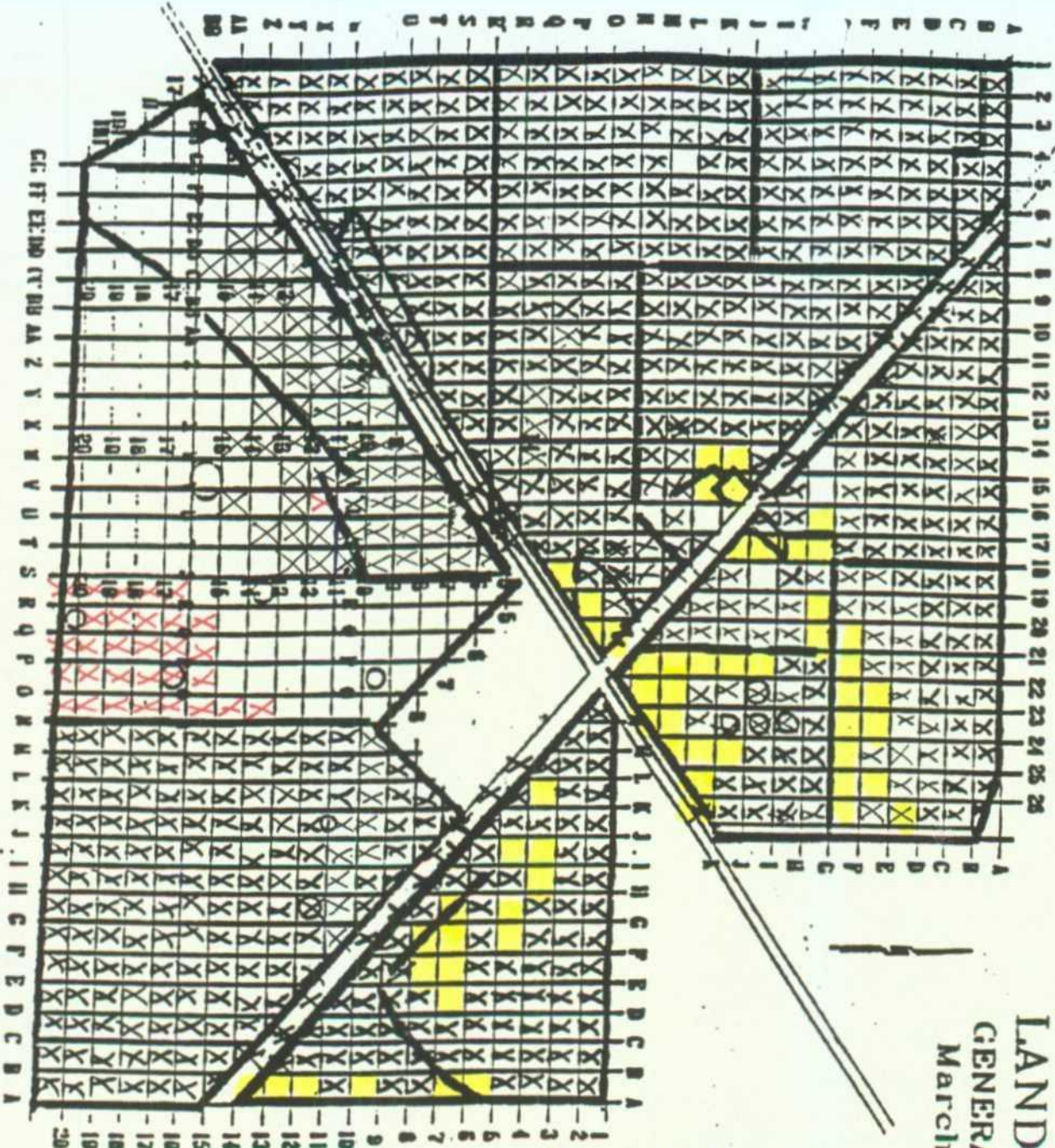
Please be advised that OCD approval does not relieve Envirotech of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve Envirotech of the responsibility for compliance with other federal, state, local laws and/or regulations. If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kieling  
Environmental Geologist

xc: OCD Aztec Office

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envirotech Notified
- X Approved 2000 August 3
- Unit #4
- X Approved 2000 October 13
- X Approved 2001 May 2
- X Approved 2002 April 1
- X Approved 2002 October 28

Unit #5

**Kielling, Martyne**

---

**From:** Robert Beers [bbeers@lanl.gov]  
**Sent:** Wednesday, October 23, 2002 7:47 AM  
**To:** WPrice@state.nm.us  
**Cc:** mkieling@state.nm.us; dkthomas@lanl.gov; stevenrae@lanl.gov; slug@lanl.gov; jchansen@lanl.gov; aferrell@fs.fed.us; clinn@fs.fed.us; kmullen@lanl.gov; A. Albert Dye  
**Subject:** Fenton Hill 1-MG Pond Closure

Dear Wayne,

This morning (Wednesday, 10/23/02) Key Energy Services, Inc., Farmington, NM, will begin transporting geothermal fluids from the Fenton Hill Geothermal Facility's 1-MG pond to TNT Construction's evaporation basins for disposal. TNT Construction is an OCD-permitted surface waste management facility in Lindrith, NM (OCD Permit No. NM-01-0008). Key Energy estimates that it will take approximately 10 days to complete this work.

Following disposal of the geothermal fluids, Key Energy will transport the sludge in the 1-MG pond to Envirotech's land farm for disposal. Envirotech, Inc., is an OCD-permitted surface waste management facility in Farmington, NM (OCD Permit No. NM-01-0011). Once the sludge has been removed, Key Energy will remove the primary and secondary liners and the pond's leak collection system. The liners and leak collection piping will be disposed of at Waste Management's Solid Waste Facility in Rio Rancho, NM. Gravel from the leak collection system will be disposed of at Envirotech's land farm. Key Energy estimates that it will take approximately 4 days to complete this work.

All of the above work will be conducted in accordance with Los Alamos National Laboratory's Closure Plan for the Fenton Hill 1-MG Service Pond (LA-UR-02-5009, August 2002).

Disposal tickets documenting waste disposal will be submitted to your office following completion of this work.

Please contact me if you have any questions regarding these activities.

Sincerely,

Bob Beers

Bob Beers  
Environmental Surveillance Team  
Water Quality & Hydrology Group  
Los Alamos National Laboratory  
MS K497  
Los Alamos, NM 87545

email: bbeers@lanl.gov  
office: 505-667-7969  
fax: 505-665-9344

10/23/2002





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor  
**Betty Rivera**  
Cabinet Secretary

September 4, 2002

**Lori Wrotenbery**  
Director  
Oil Conservation Division

Mr. Harlin M. Brown  
Envirotech, Inc.  
5796 U.S. Highway 64-3014  
Farmington, NM 87401

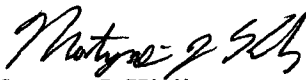
**RE: Request for Permit Modification NM-01-0011**  
**Envirotech, Inc.**  
**Section 6, Township 26 North, Range 10 West, NMPM**  
**San Juan County, New Mexico**

Dear Mr. Brown:

The Oil Conservation Division (OCD) has received and has reviewed the above referenced permit modification dated July 10, 2002. The information contained within is administratively complete. The OCD Environmental Bureau will submit a draft permit modification to the Director for review.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

  
Martyne J. Kieling  
Environmental Geologist

xc with attachments:  
Aztec OCD Office

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

August 5, 2002

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

Dear Ms. Kieling

Envirotech, Inc. respectfully requests "Discontinued Maintenance Status" (DMS) for the soil contained in the following cells located within the Envirotech Soil Remediation Facility (ESRF), Landfarm # 2 Unit 5, Hilltop, New Mexico.  
Cells:

N -13, N -14, N -15, N -16, N -17, N -18 AND N -19 720

O -15, O -16, O -17, O -18 AND O - 19 420

P - 15, P - 16, P - 17, P - 18 AND P - 19 720

Q - 15, Q -16, Q - 17, Q - 18 AND Q-19

R - 16, R - 17, R - 18 AND R - 19 72-20

U-11

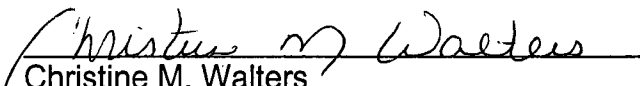
Also enclosed are the second quarter background sample results. Eight soil samples were collected on 6/17/02 in the following cells located within the Envirotech Soil Remediation Facility (ESRF), Landfarm # 2 Unit 5, Hilltop, New Mexico.

Cells:

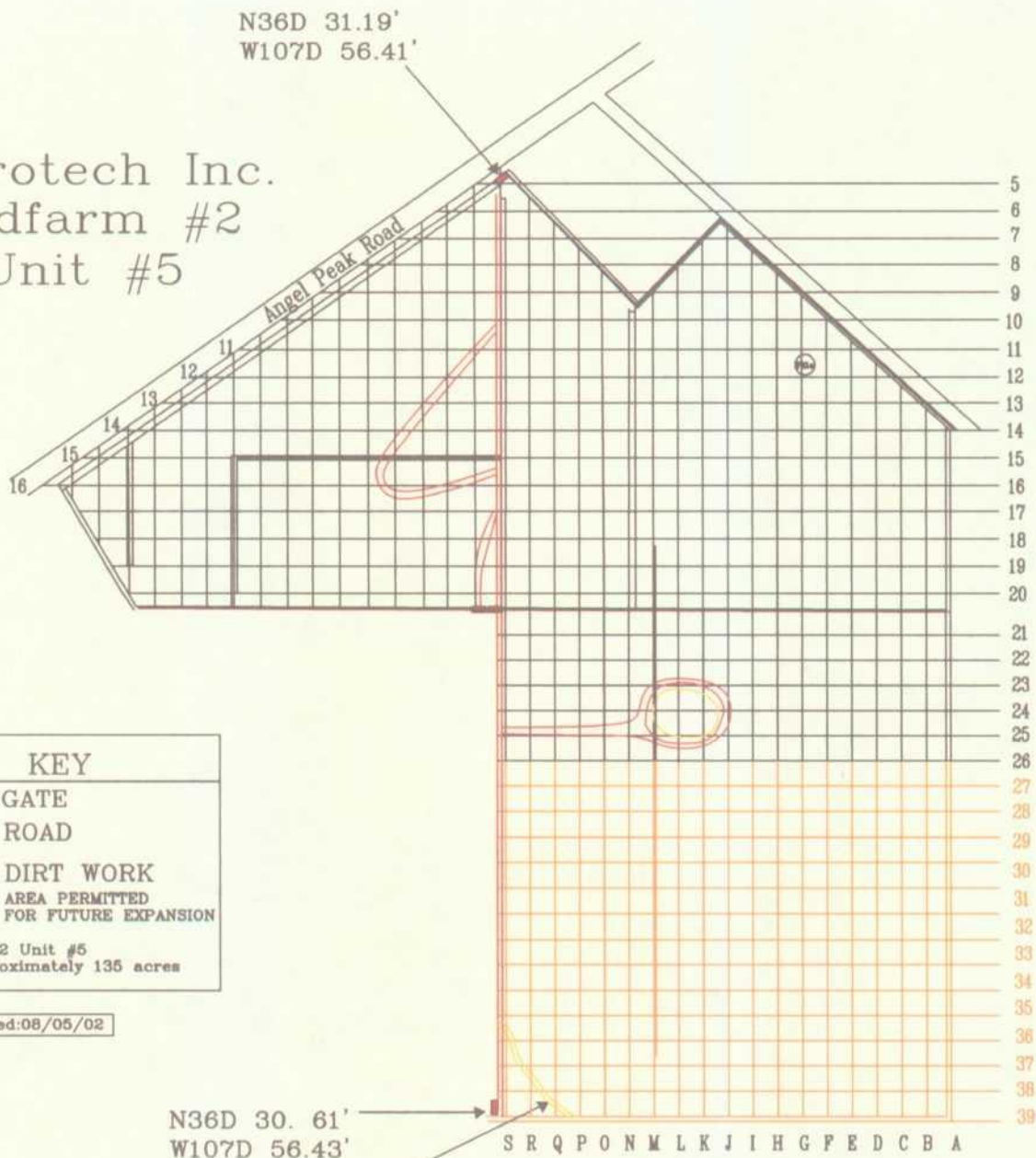
N - 16, P - 7, P - 12, Q - 16, S - 19, V - 16, BB - 18 AND EE - 14.

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

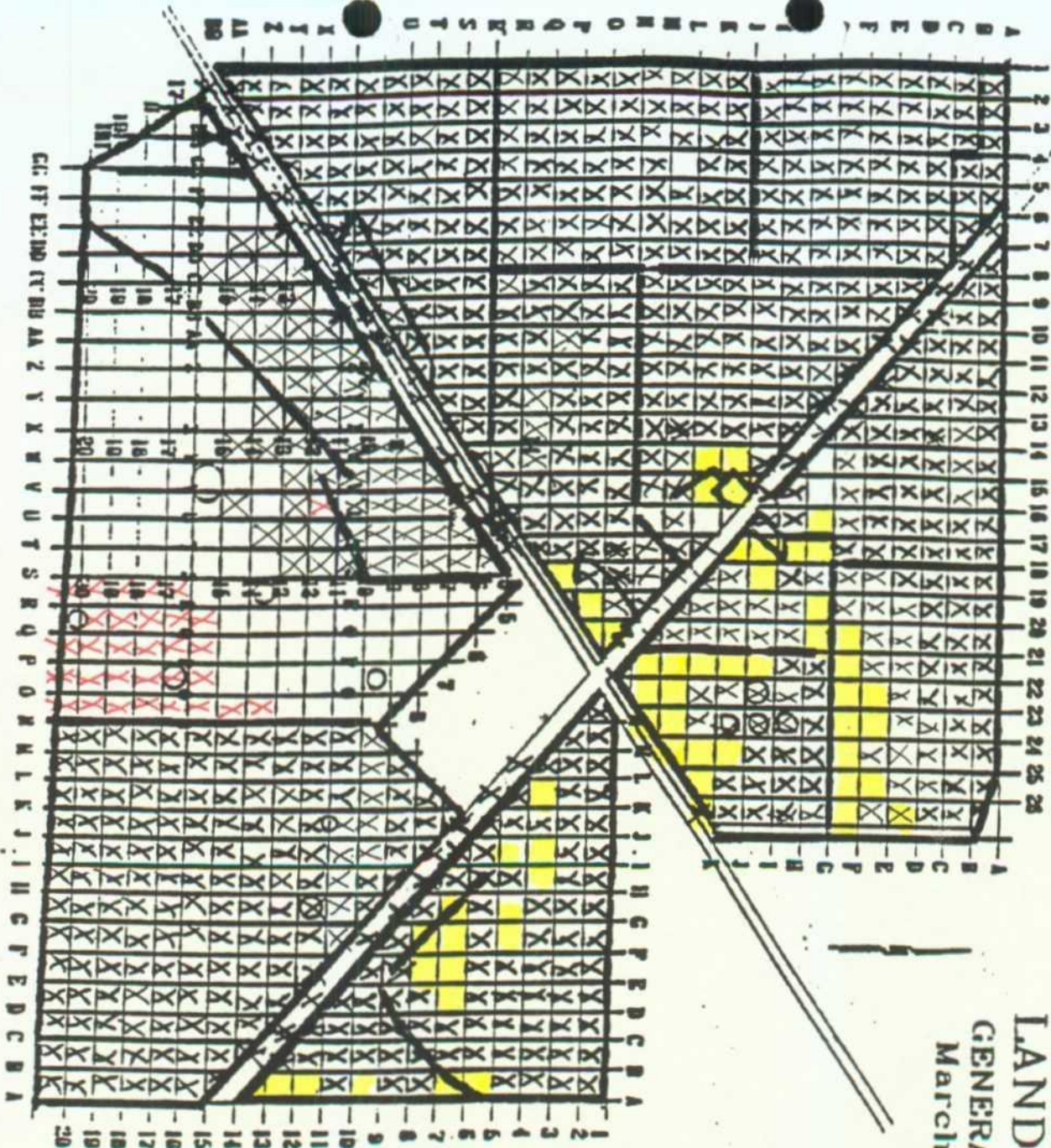
Envirotech Inc.  
Landfarm #2  
Unit #5



DIRT WORK REQUIRED FOR  
RUNOFF CONTROL



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envirotech Notified
- X Approved 2000 August 3

- Unit #4**
- X Approved 2000 October 13
  - X Approved 2001 May 2
  - X Approved 2002 April 1
  - X Approved 2002 October 28

**Unit #5**

EC: FT ELMO (T) DB AA Z Y X W V U T S R Q P O N L K J I H G F E D C B A



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

July 10, 2002

State Of New Mexico  
Energy Minerals and Natural Resources Division  
Attn: Martyne Keiling  
Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87504

Re: Expansion of Landfarm #2

Dear Mrs. Keiling:

Envirotech Inc. is requesting approval for an expansion of our active landfarm acreage at our NMOCDC permitted Soil Remediation Facility, Landfarm #2. The area we propose to open has been permitted in the past under an expansion approved in 1993. As you will recall the subject area was dropped from active status in 2000 when our permit was renewed. We propose to open the "square" area directly south of the existing berm in Landfarm #2. The proposed expansion will continue south from the existing boundary to the south section line of Section 6. The east boundary will be an extension of the "A-Line" that forms the east boundary of previously closed portions of Landfarm #2. The west boundary of the proposed expansion is a north-south line that intersects the pipeline right-of-way adjacent to the highway right-of-way. We are in the process of making an application to the New Mexico Environment Department Groundwater Pollution Prevention Section to expand Landfarm #3 into the triangular segment bounded by the south line (20 Line) of current Landfarm #2 boundaries, the proposed west line of the Landfarm #2 expansion, and the pipeline/highway right of ways.

We would like to expedite expansion of the facility as we have had an unexpected surge in landfarm activity. We have completed installation of fence on the outer boundaries of the proposed expansion with a five strand barb wire fence to control access and prevent cattle from entering the site. A permanent entrance will be developed at the southwest corner of the expansion area with new gates, road access, and cattle guards. In the interim we propose to use current gates and controls from our existing facility. Access to the expansion area will be along the road parallel to the S-Line. We will open the berm and fence to allow access to the expansion area.

We are in the process of obtaining bonding for the proposed expansion. Based on calculations for our previous bond we are pursuing a bond in the amount of \$55,155.00 for the 82.69 acre expansion.

If you have questions or comments regarding our request to expand Landfarm #2 please feel free to contact us at 800-362-1879.

Respectfully submitted,  
Envirotech Inc.



Harlan M. Brown  
Geologist / Hydrogeologist  
New Mexico Certified Scientist #083

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

July 10, 2002

Ms. Lori Wrotenbery  
State of New Mexico  
Oil Conservation Division  
1220 S. St. Francis Dr.  
Santa Fe, New Mexico 87504

Phone (505) 476-3440  
Fax (505) 476-3462

**RE: Expansion of Soil Remediation Facility No. 2  
Section 6, Township 26 N, Range 10 W  
San Juan County, New Mexico**

Dear Ms. Wrotenbery:

Young Environmental Services, dba Envirotech Inc., currently operates Soil Remediation Facility No. 2 in the Northwest ¼ of Section 6, Township 26 North, Range 10 West N.M.P.M., San Juan County, New Mexico. This facility is operated under permit No. NM-01-0011, granted April 18, 2000, by the New Mexico Oil Conservation Division (NMOCD) under OCD Rule 711. The NMOCD is the supervisory agency providing direction and routine inspection of the facility.

Envirotech's current facility consists of approximately 212 acres, 150 of which have been closed by the NMOCD, that are fenced and bermed to provide a secure location. Within the enclosure, we thin spread oilfield hydrocarbon contaminated soils for remediation. The property is located approximately 14 miles south of Bloomfield, New Mexico, off of U.S. Highway 550, in San Juan County.

The proposed expansion area adjoins our current facility on the south. The proposed expansion area encompasses 82.69 acres in Section 6, Township 26 North, Range 10 West, N.M.P.M. This area previously underwent all notification and hearing procedures and was approved for expansion by the NMOCD. However, due to increased bond requirements in 2000, it was not included in our current permit. We are now requesting that this land be repermited.

Morris D. Young personally owns the property. The property is undeveloped ranch land that is uniquely suited for thin spread soil remediation. As per the attached AREA/PROPERTY OWNERSHIP MAP, the site is bounded on all sides by either Bureau of Land Management administered land or land owned by Morris D. Young. As noted, the BLM was notified of the expansion prior to 2000.

The property is relatively plainer with a gentle slope to the west. U.S. Hwy 550 provides year round access to the property. The site is remote from any population except for a mobile home occupied by an employee of the rancher, who is currently leasing a portion of the property for grazing on a monthly basis. Groundwater is at 1,102 feet below ground surface. The only water well within

ten miles of the site is located at the Thriftway Convenience Store approximately two (2) miles to the northwest. This well is completed in the Ojo Alamo formation. Top perforations are reported to be at 1,220 feet below ground surface.

The entire soil remediation site will be bermed and fenced. There is little or no drainage to the property. A 5-foot high earthen berm with a 2:1 slope will ensure positive containment on-site of any storm waters. Normal annual precipitation at the site is approximately 9 ½ inches. A 5-strand barbed wire fence will be placed at the outside toe of the berm to prevent encroachment onto the site of any livestock. All gates will be locked unless an Envirotech employee is present on-site to prevent unauthorized entry to the facility.

Envirotech's remediation site operating personnel are 40 hour OSHA trained for Hazardous Material Handling and Site Investigation as well as 24-hour State of New Mexico Mine Safety and Health Administration (MSHA) trained.

The proposed expansion area exhibits the same positive site characteristics that make our existing facility situated in the best possible location to efficiently and effectively remediate hydrocarbon contaminated soils without impacting the groundwater and/or the health, safety, and welfare of the population of the San Juan Basin.

Your immediate attention to this application is appreciated. If we can provide any additional information or in any way be helpful, please contact us.

Sincerely,

**ENVIROTECH INC.**



Landrea R. Jackson  
Administrative Assistant

Enclosure

LRJ:\060502 LF Expansion

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-137  
Revised March 17, 1999

Submit Original Plus 1  
Copy to Santa Fe  
1 Copy Appropriate  
District Office

**APPLICATION FOR WASTE MANAGEMENT FACILITY**

(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other  
☒ Solids/Landfarm ☐ Treating Plant

2. Operator: Envirotech Inc.

Address: 5796 U.S. Hwy 64, Farmington, New Mexico 87401

Contact Person: Harlan Brown Phone: (505) 632-0615

3. Location: See Attached Description Section 6 Township 26N Range 10W  
Submit large scale topographic map showing exact location

4. Is this a modification of an existing facility? ☒ Yes ☐ No
5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.
6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.
8. Attach a contingency plan for reporting and clean-up for spills or releases.
9. Attach a routine inspection and maintenance plan to ensure permit compliance.
10. Attach a closure plan.
11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.
12. Attach proof that the notice requirements of OCD Rule 711 have been met.
13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.
14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

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

Name: Harlan M. Brown  
Signature: Harlan M. Brown

Title: Vice President - Operations

Date: 7.10.02

**5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.**

This site is owned by: Morris D. Young.  
5796 US Hwy 64  
Farmington, New Mexico 87401

All adjacent land is owned by Morris D. Young or:  
Bureau of Land Management  
1235 La Plata Highway, Suite A  
Farmington, New Mexico 87401

**6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.**

See Attached Figures.

**7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.**

See Attached Figures.

**8. Attach a contingency plan for reporting and cleanup for spills or releases.**

The OCD Santa Fe and Aztec offices will be notified within 24 hours of the discovery of any spills or leaks or if any defect in the landfarm is noted. Any necessary repairs will be made as soon as possible after their discovery. If the integrity of the landfarm has been jeopardized, additional wastes will not be placed in the facility until repairs have been completed.

**9. Attach a routine inspection and maintenance plan to ensure permit compliance.**

The facility will be inspected no less than once every two weeks and following each consequential rainstorm or windstorm.

**10. Attach a closure plan.**

The OCD Santa Fe and Aztec offices will be notified when operation of the facility is to be discontinued for a period in excess of six (6) months or when the facility is to be dismantled. Within six (6) months after discontinuing use or within 30 days of deciding to dismantle the facility a closure plan will be submitted to the OCD Santa Fe office for approval. Envirotech will complete cleanup of constructed facilities and restoration of the facility site within six (6) months of receiving the closure plan approval.

Our closure plan includes the following procedures:

- a) No new material will be accepted.
- b) Existing landfarm soils will be remediated until they meet OCD standards.
- c) The treatment zone soils within each cell will be sampled at two (2) to three (3) feet below the native ground surface and will be analyzed for TPH, BTEX, major cations/anions, and WQCC metals.
- d) Contaminated soils exceeding OCD closure standards will be remediated.
- e) The facility will be contoured, seeded with native grasses, and allowed to return to its natural state.
- f) Closure will be subject to OCD requirements and applicable laws.

**11. Attach geological/hydrological evidence demonstrating that disposal of oilfield wastes will not adversely impact groundwater. Depth to and quality of groundwater must be included.**

The property is undeveloped ranch land that is uniquely suited for thin spread soil remediation. The property is relatively plainer with a gentle slope to the west. Groundwater is at 1100 feet below ground surface. The nearest water well is approximately 2 miles to the northwest and is completed in the Ojo Alamo formation. Top perforations are reported to be at 1220 feet below ground surface.

**12. Attach proof that the notice requirements of OCD Rule 711 have been met.**

The proposed expansion area adjoins our current facility on the south. This area previously underwent all notification and hearing procedures and was approved for expansion by the NMOCD. However, due to increased bond requirements in 2000, it was not included in our current permit. Since there have been no changes in property ownership near the facility we don't feel re-notification is necessary.

**13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.**

Haulers are not to deliver H<sub>2</sub>S containing materials to our facility. In the event of a release, personnel will be evacuated to an upwind location until suitable PPE and monitoring equipment can be delivered to the site.

**14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations, and orders.**

- The active portion of the facility will be fenced and bermed to prevent runoff and runoff.
- Disposal will occur only when an attendant is on duty. The facility will be secured when no attendant is present.
- All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
- Soils will be spread on the surface in lifts of six (6) inches or less.
- Moisture will be added as necessary to enhance bioremediation and to control blowing dust. No ponding or pooling of runoff water will be allowed.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

May 6, 2002

Lori Wrotenbery

Director

Oil Conservation Division

Mr. Harlan M. Brown  
Envirotech Inc.  
5796 U. S. Highway 64-3014  
Farmington, New Mexico 87401

**RE: Determination of soil and liquids from JACO Petroleum, Dulce NM**

Dear Mr. Brown:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) letter dated April 22, 2002 requesting a determination on contaminated soils and liquids from the JACO Petroleum site in Dulce, NM. The contaminated soil described in your letter is non-exempt oilfield waste and requires representative samples be tested for full toxicity characteristic (TCLP) metals, volatiles and semi-volatiles along with reactivity, corrosivity and ignitability as per 40CFR 261. If the soil tests non-hazardous Envirotech may submit a Form C-138 requesting acceptance into the landfarm facility permit No. NM-02-0011.

The liquid from the sump described in your letter is also non-exempt oilfield waste and requires representative samples be tested for full toxicity characteristic (TCLP) metals, volatiles and semi-volatiles along with reactivity, corrosivity and ignitability as per 40CFR 261. If the liquid tests non-hazardous a permitted oil field disposal company that is authorized to accept non-exempt liquids may submit a Form C-138 requesting acceptance into their facility.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

RECEIVED

MAY 06 2002

Environmental Bureau  
Oil Conservation Division

RECEIVED  
MAY 06 2002  
Environmental Bureau  
Oil Conservation Division

May 3, 2002

New Mexico Environment Department  
Hazardous Waste Bureau  
Attn: Dave Cobrain, Waster Resource Specialist  
2905 Rodeo Park Drive East, Bldg 1  
Santa Fe, New Mexico 87505

505-428-2541  
Fax 505-428-2567

Re: Revised letter for waste determination for the former Thriftway Refinery near Bloomfield,  
New Mexico

Dear Mr. Cobrain:

Biotech Remediation has provided a revised letter describing the work they have proposed at the former Thriftway Refinery located near Bloomfield, New Mexico. The letter is attached to this correspondence. Please note that the scope of work has been modified to include cleanup of spills and leaks around several tanks located at the east end of the facility.

If you have further questions regarding this project or if we can be of further service please feel free to contact us at 505-632-0615.

Sincerely,  
Envirotech Inc.

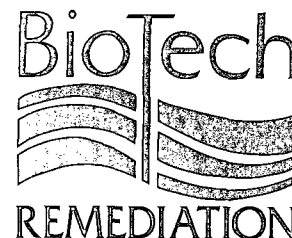


Harlan M. Brown  
Geologist / Hydrogeologist  
New Mexico Certified Scientist #083

cc:

Bitotech Remediation; Ms. Terry Griffin, 501 Airport Drive Suite 504, Farmington, NM 87401  
NMOCD, Martyne Kieling, 1220 S. St Francis Drive, Santa Fe, New Mexico 87505

RECEIVED APR 11 2002



501 Airport Drive – Suite 104

Farmington, New Mexico 87401  
Off: (505) 327-4965  
Fax: (505) 564-3604

April 10, 2002

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

Re: Thriftway Bloomfield Refinery

Dear Morris:

Thriftway is planning to clean several areas at the Bloomfield Refinery for inspection per the current Discharge Renewal Plan. In order to complete the inspection, the sumps and stained soils around several tanks within the tank farm and two lined lagoons will need to be cleaned and the sludge will need to be disposed of in an appropriate manner. It is our understanding that characterization of the waste streams for disposal is dependent on when the storage areas were last used. A Site Plan of the tanks and lagoon liners is attached.

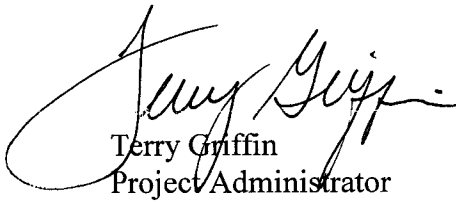
There are several crude oil storage tanks located at the east side of the refinery. A couple of the tanks have concrete sumps (6' x 10' x 5') adjacent to them that were used to catch condensed water drawn off the bottom of the tanks, the other tanks had valves which leaked and stained soil needs to be removed. All tanks and associated sumps were last used when they were rented to Giant Industries. The tanks and sumps have not been used since December 1998.

We also need to clean and inspect the lined evaporation lagoons located west of the refinery process unit. To the best of our knowledge the refinery ceased refining operations in December 1990. Process water from the plant has not been added to the evaporation lagoons since refinery operations stopped.

Morris Young  
April 10, 2002  
Page 2

Thank you for your assistance. If you need further information, please contact me at 505-327-4965.

Respectfully,

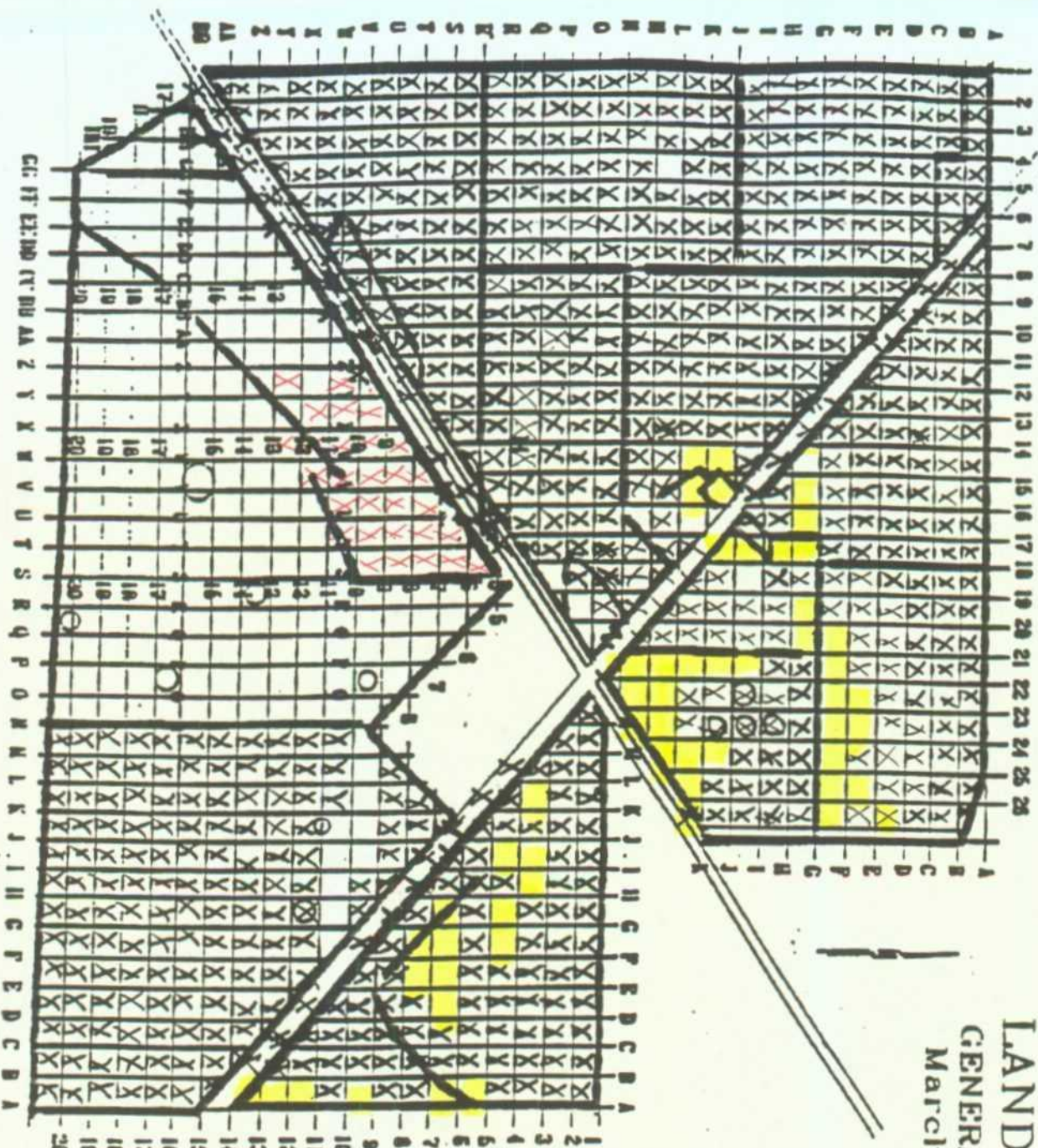


Terry Griffin  
Project Administrator

hmb/TG

---

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- ☐ Empty Cells Letter 3-10-2000 Envirotech Notified
- X Approved 2000 August 3
- Unit #4
- X Approved 2000 October 13
- X Approved 2001 May 2

Unit #5

CELLS EXCLUDED (T, R, B, A, Z, Y, X, V, U, T, S, R, Q, P, O, N, M, L, K, J, I, H, G, F, E, D, C, B, A)



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

April 24, 2002

Mr. Harlan M. Brown  
Envirotech Inc.  
5796 U. S. Highway 64-3014  
Farmington, New Mexico 87401

**RE: Acceptance of Soil from JACO Petroleum, Dulce NM**

Dear Mr. Brown:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) letter dated April 22, 2002 requesting a determination on contaminated soils from the JACO Petroleum site in Dulce, NM. The contaminated soil described in your letter is non-exempt oilfield waste and requires representative samples be tested for full toxicity characteristic (TCLP) metals, volatiles and semi-volatiles along with reactivity, corrosivity and ignitability as per 40CFR 261. If the soil tests non-hazardous Envirotech may submit a Form C-138 requesting acceptance into the landfarm facility permit No. NM-02-0011.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

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

Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

OIL CONSERVATION DIV.

02 APR 23 PM 1:20

April 22, 2002

New Mexico Oil Conservation Division  
Attn: Roger Anderson  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505

505-476-3490

Re: Soil profile and acceptance; JACO Petroleum, Dulce, New Mexico

Dear Roger:

Envirotech is working with the Jicarilla Apache Nation to resolve several issues at a transmix separation unit operated by JACO Petroleum. The process unit is located at the east side of Dulce, New Mexico. There are a number of issues that relate to the disposal of water and petroleum hydrocarbon contaminated soil generated at the facility. The following is a description of the process and issues associated with a potential disposal event.

Feedstock for the system is the transmix collected from various companies involved in constructing pipelines for gathering crude oil and natural gas. When a new line is completed, it is subjected to hydrostatic tests to check for leaks. When the "hydro-tests" are completed water is pigged to waiting transports for disposal. The inside of the line is then cleaned with a "slug" of gasoline and a slug of diesel. As the line solvent (gasoline and diesel) reaches a pigging port it is loaded on transports and moved to the JACO Facility for storage, gravity separation of entrained water, and separation back to gasoline and diesel products. "Transmix" is offloaded to the storage tanks at the facility. The transfer of product takes place on a concrete slab to catch any spills. The concrete slab is located north of the tank battery.

Envirotech has been asked to accept soil contaminated with Transmix at our soil remediation facility. Soil contamination has occurred around a 40 barrel sump set to the west of the main tank battery. Transmix transfers occur in all kinds of weather including rain and snow storms. The concrete loading / unloading area has a swale constructed in it with a drain buried 30-42" below natural grade. Petroleum hydrocarbons released during loading or unloading procedures drains to the line along the concrete surface and then into the 40 barrel tank. The tank is buried at approximately 32" below the surrounding ground surface. The top is open except for a diamond mesh cover to keep small animals and birds out of the liquids. Water has accumulated under the oily liquids and lifted oil over the edges of the tank resulting in soil contamination along the west side of the tank.

There are several issues related to profiling, characterization, and disposal of the petroleum hydrocarbon contaminated soil. Transmix is a distinctly oil and gas exploration and production by-product. The situation is complicated by the use of gasoline and diesel components.



Page Two  
JACO Transmix Contamination

We are looking for a solution that is cost effective and that addresses not only the contaminated soil but also water associated with the hydrostatic testing and purging operations. For purposes of remediation/disposal we need to determine whether the waste steams (water and soil) would be regulated by the NMOCD or by the New Mexico Environment Department Solid Waste Bureau. We also need to determine whether the waste products qualify as "exempt" waste. Note that the sump is below grade which may "marginally" qualify it as an underground storage tank.

JACO has historically removed soil contaminated by spills and leaks from the tank battery and supply lines and placed it in bermed storage behind the tank battery. Remediation has not occurred because the piles are too thick and have not been tilled or turned. New management is trying to address soil and water contamination by removing it from the reservation to appropriate permitted facilities such as Envirotech's Landfarm, Key Energy's Water Disposal, or Basin's Water Disposal. Profiling and jurisdiction become central to issues of off-reservation waste management.

We would appreciate your comments and assistance in resolving this problem.

If you have any questions or comments regarding the proposed scope of work or costs please feel free to contact us at 800-362-1879.

Sincerely,  
Envirotech Inc.



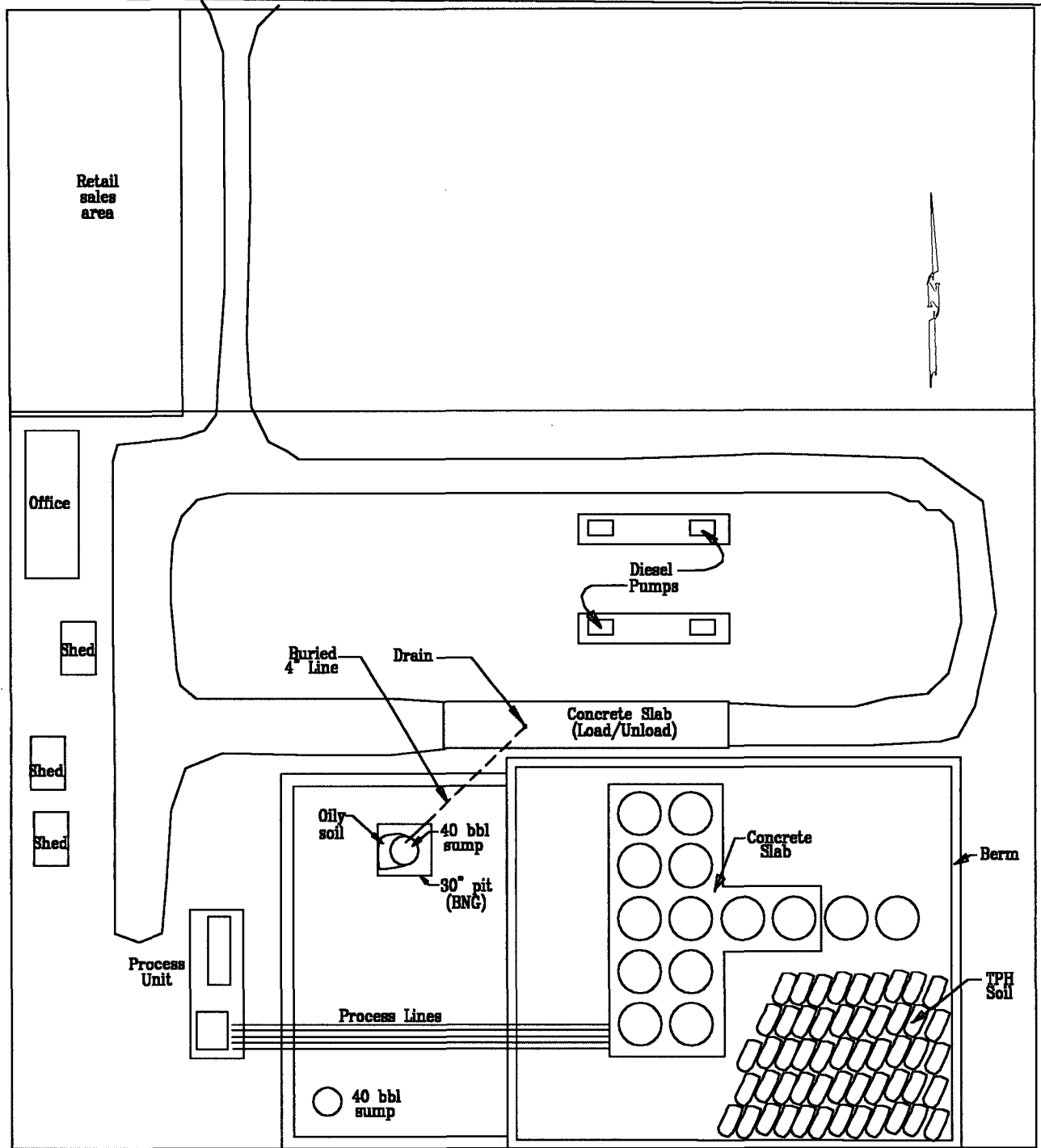
Harlan M. Brown  
Geologist / Hydrogeologist  
New Mexico Certified Scientist #083

cc: Denny Foust, NMOCD, Aztec District Office, 100 Rio Brazos Road, Aztec, New Mexico 87410  
Dave Cobrain, NMED Hazardous Waste Bureau, 2905 Rodeo Park Drive East, Bldg 1, Santa Fe, New Mexico 87505

← Farmington

West Bound NM Hwy 64

Bloomfield →



NO SCALE

<p><b>JACO Petroleum Transmix Facility</b></p> <p>US Hwy 64 NE4 Sec 1, T31N, R2W Dulce, New Mexico Rio Arriba County, NM Project No.: 00000-000</p>	<p><b>Envirotech Inc.</b></p> <hr/> <p>Environmental Scientists &amp; Engineers 5796 US Highway 64 Farmington, New Mexico</p>	<p><b>Site Map</b></p>	
		<p>Figure 2</p>	<p>Date: 04/02</p>
		<p>DRW: HMB</p>	<p>PRJ MGR: HMB</p>





# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor  
Betty Rivera  
Cabinet Secretary

April 1, 2002

Lori Wrotenbery  
Director  
Oil Conservation Division

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7099-3220-0000-5051-1200**

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 #2  
Permit NM-01-0011  
NW 1/4, of Section 6, T. 26 North, R. 10 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 March 25, 2002 requesting discontinued maintenance status. Based on the information provided the following Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Unit 5 Cells**

Cell S-10	Cell U-12	Cell Y-11	Cell AA-13	Cell CC-14
Cell S-11	Cell U-14	Cell Z-10	Cell AA-14	Cell CC-15
Cell S-12	Cell V-12	Cell Z-11	Cell BB-12	Cell DD-13
Cell T-11	Cell W-13	Cell Z-12	Cell BB-13	Cell DD-14
Cell T-12	Cell W-14	Cell Z-13	Cell BB-14	
Cell T-13	Cell X-12	Cell AA-11	Cell CC-12	
	Cell X-13	Cell AA-12	Cell CC-13	

Please note that Cell U-11 mentioned in the March 25, 2002 letter was not included as part of the analytical package, and therefore is not approved. There was however analytical for Cell CC-15 which was not mentioned in the March 25, 2002 letter.

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,

Mr. Morris Young  
April 1, 2002  
Page 2

OCD approval does not relieve Envirotech of the responsibility for compliance with other federal, state, local laws and/or regulations.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

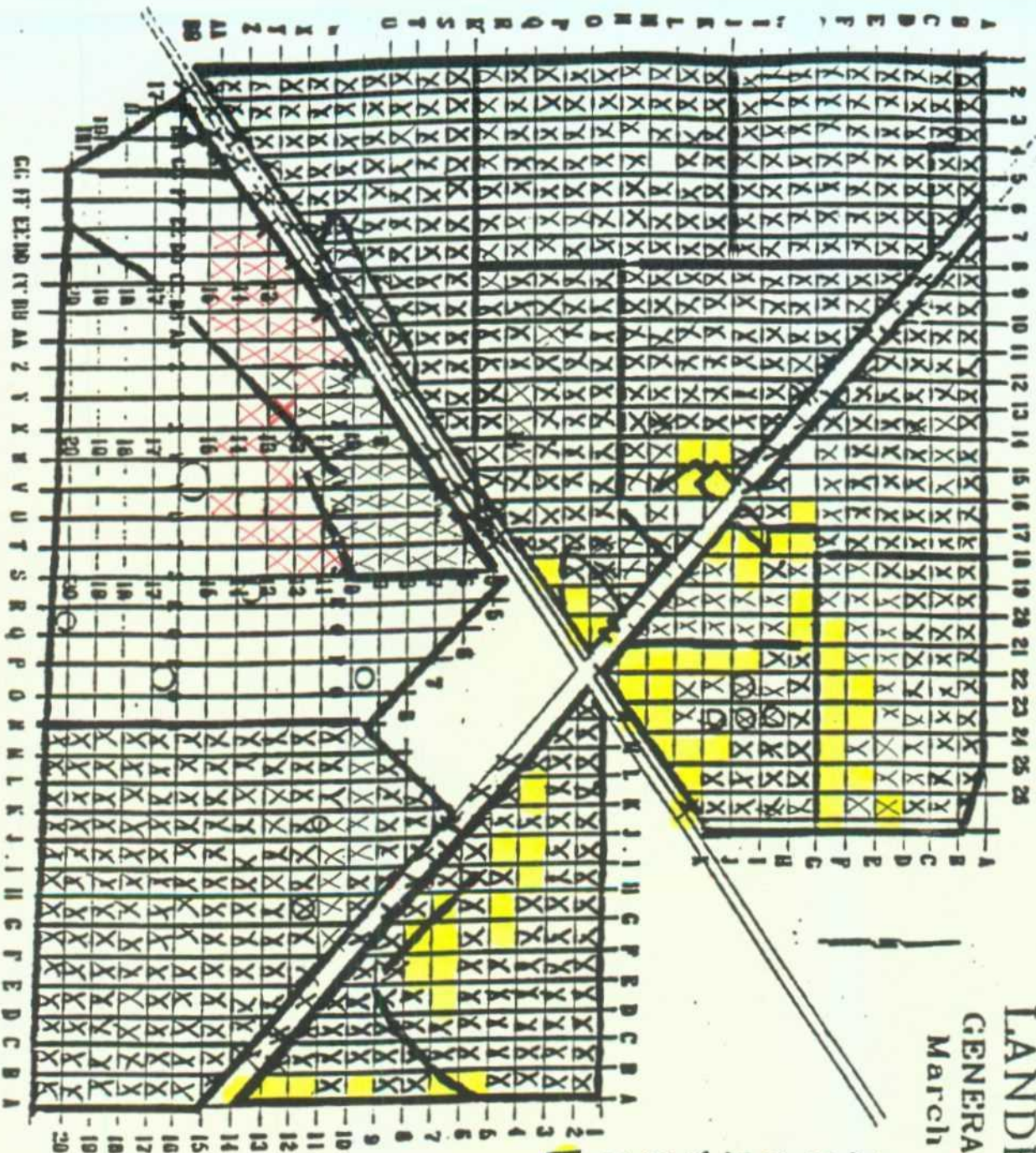
Sincerely,

A handwritten signature in black ink, appearing to read "Martyne J. Kieling".

Martyne J. Kieling  
Environmental Geologist

xc:     OCD Aztec Office

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envitech Notbed
- X Approved 2000 August 3

## Unit #4

- X Approved 2000 October 13
- X Approved 2001 MAY 2
- X Approved 2002 April 1

## Unit #5



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor  
Betty Rivera  
Cabinet Secretary

April 1, 2002

Lori Wrotenberg  
Director  
Oil Conservation Division

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7099-3220-0000-5051-1200**

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 #2  
Permit NM-01-0011  
NW 1/4, of Section 6, T. 26 North, R. 10 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 March 25, 2002 requesting discontinued maintenance status. Based on the information provided the following Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Unit 5 Cells**

Cell S-10	Cell U-12	Cell Y-11	Cell AA-13	Cell CC-14
Cell S-11	Cell U-14	Cell Z-10	Cell AA-14	Cell CC-15
Cell S-12	Cell V-12	Cell Z-11	Cell BB-12	Cell DD-13
Cell T-11	Cell W-13	Cell Z-12	Cell BB-13	Cell DD-14
Cell T-12	Cell W-14	Cell Z-13	Cell BB-14	
Cell T-13	Cell X-12	Cell AA-11	Cell CC-12	
	Cell X-13	Cell AA-12	Cell CC-13	

Please note that Cell U-11 mentioned in the March 25, 2002 letter was not included as part of the analytical package, and therefore is not approved. There was however analytical for Cell CC-15 which was not mentioned in the March 25, 2002 letter.

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,

Mr. Morris Young  
April 1, 2002  
Page 2

OCD approval does not relieve Envirotech of the responsibility for compliance with other federal, state, local laws and/or regulations.

If you have any questions please do not hesitate to contact me at (505) 476-3488.

Sincerely,

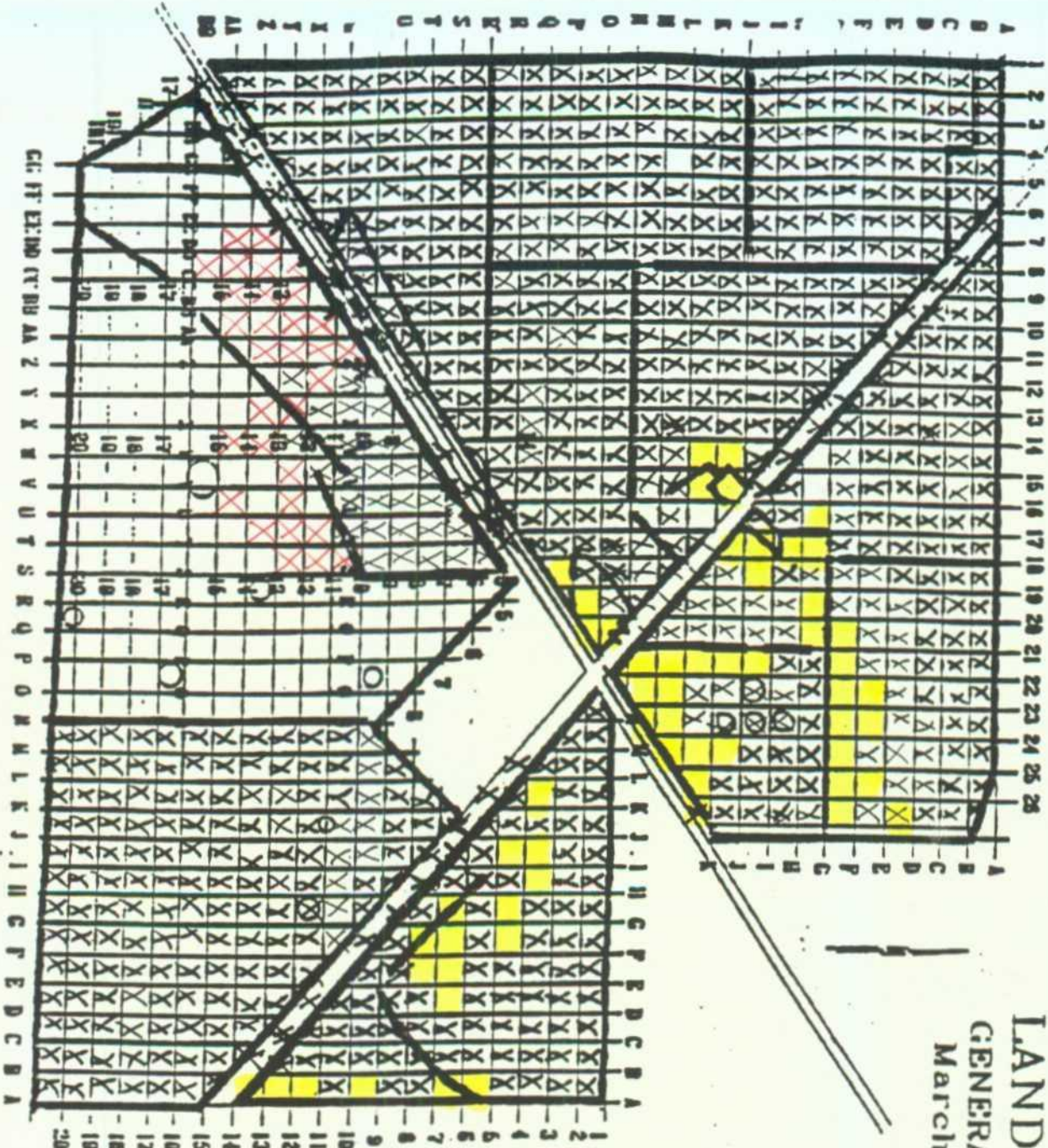
A handwritten signature in black ink, appearing to read "Martyne J. Kieling".

Martyne J. Kieling  
Environmental Geologist

xc:     OCD Aztec Office



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envirotech Notified
- X Approved 2000 August 3

## Unit #4

- X Approved 2000 October 13
- X Approved 2001 May 2
- X Approved 2002 April 1

## Unit #5

GC FT EX MD CV BR AA Z Y X W V U T S R Q P O N M L K J I H G F E D C B A

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

March 25, 2002

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

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 # 2 Unit 5, Hilltop, New Mexico.  
Cells:

S-10, S-11, S-12

T-11, T-12, T-13

• U-11, U-12, U-14

V-12

W-13, W-14

X-12, X-13

Y-11

Z-10, Z-11, Z-12, Z-13

✓ AA-11, AA-12, AA-13, AA-14  
✱

BB-12, BB-13, BB-14

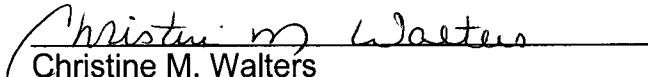
CC-12, CC-13, CC-14 , CC-15

DD-13 and DD-14



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



Martynne  
Kielling  
Jack Ford

July 11, 2001

EMNRD NMOCD  
Attn: Denny Foust  
1000 Rio Brazos  
Aztec, New Mexico 87410



Re: Disposal request for neat cement

Dear Denny:

Envirotech Inc. is coordinating the disposal of neat cement for Halliburton Energy Services, Located at 4109 E. Main Street Farmington, New Mexico. The cement is new product that got wet in a truck on a job location. The product was removed by force (hammers, chisels) and is ready for disposal. The material is in a small pile south of the Bulk Plant near Halliburton's paint shop.

An MSDS for the product is attached. There were no additives to the product.

We have attached Halliburton's letter to WMI (John Hammer) requesting disposal according to Rule 712 D(1)c (new unused product). Note the cement is in large chunks, making it impractical for "remediation" at our landfarm or for use as road stabilization material.

If you have further questions regarding this project or if we can be of further service please feel free to contact us at 505-632-0615.

Sincerely,  
Envirotech Inc.

A handwritten signature in cursive script, reading "Harlan M. Brown".

Harlan M. Brown  
Geologist / Hydrogeologist  
New Mexico Certified Scientist #083



**HALLIBURTON ENERGY SERVICES**

4109 East Main Street / Farmington, NM 87401

July 11, 2001

John Hammer  
Waste Management  
San Juan Regional Landfill  
101 Spruce  
Farmington, NM  
87410

Dear John Hammer,

**Subject: Request for Neat Cement Disposal**

Halliburton Energy Services respectfully requests the disposal of neat cement from our Main yard facility into the San Juan County Landfill. This neat cement has no additives. We make this request in accordance with the disposal rule 19.15.9.712 paragraph D.1.c of the New Mexico disposal regulations.

Sincerely,

Kellie Skelton  
HSE Technical Professional

A handwritten signature in black ink, appearing to read 'Kellie Skelton', written over the typed name and title.

cc: Allen Rodrigue  
file

CEMENT - STANDARD - CLASS B - BULK

PAGE 1

MATERIAL SAFETY DATA SHEET  
HALLIBURTON ENERGY SERVICES  
DUNCAN, OKLAHOMA 73536

DATE: 07-05-01  
REVISED DATE 04-07-99

EMERGENCY TELEPHONE: 800/666-9260 OR 580/251-3359  
EMERGENCY TELEPHONE: 800/666-9260 OR 580/251-3359

\* \* \* \* \* SECTION I - PRODUCT DESCRIPTION \* \* \* \* \*

CHEMICAL CODE: CEMENT - STANDARD - CLASS B - BULK PART NUMBER: 516002630  
PKG QTY: BULK APPLICATION: CEMENTING  
SERVICE USED: CEMENT

\* \* \* \* \* SECTION II - COMPONENT INFORMATION \* \* \* \* \*

COMPONENT+ + + + +	PERCENT	TLV	PEL
PORTLAND CEMENT	> 60 %	10 MG/M3	10 MG/M3
SILICA, CRYSTALLINE--QUARTZ	<3 %	0.1 MG/M3	0.1 MG/M3

\* \* \* \* \* SECTION III - PHYSICAL DATA \* \* \* \* \*

PROPERTY	MEASUREMENT
APPEARANCE	GRAY SOLID, POWDER
ODOR	ODORLESS
SPECIFIC GRAVITY (H2O=1)	3.150
BULK DENSITY	94.00 LB/CU.FT.
PH	12.4
SOLUBILITY IN WATER AT 20 DEG C. GMS/100ML H2O	.1-1.0
BIODEGRADABILITY	N/A
PERCENT VOLATILES	0
EVAPORATION RATE(BUTYL ACETATE=1)	N/A
VAPOR DENSITY	N/A
VAPOR PRESSURE (MMHG)	N/A
BOILING POINT(760 MMHG)	N/A
POUR POINT	N/A
FREEZE POINT	N/A
SOLUBILITY IN SEAWATER	NOT EVALUATED
PARTITION COEF (OCTANOL IN WATER)	NOT EVALUATED

\* \* \* \* \* SECTION IV - FIRE AND EXPLOSION DATA \* \* \* \* \*

NFPA(704) RATING:  
HEALTH 1 FLAMMABILITY 0 REACTIVITY 0 SPECIAL NONE  
FLASH POINT N/A  
AUTOIGNITION TEMPERATURE ND F / ND C  
FLAMMABLE LIMITS (OZ. PER CU. FT.) LOWER N/D UPPER N/D  
\*\*\*\*\*  
EXTINGUISHING MEDIA:  
NONCOMBUSTIBLE  
SPECIAL FIRE FIGHTING PROCEDURES:  
NOT APPLICABLE.  
UNUSUAL FIRE AND EXPLOSION HAZARDS:  
NO FIRE HAZARD.  
NOT APPLICABLE.

\* \* \* \* \* SECTION V - HEALTH HAZARD DATA \* \* \* \* \*

PN: 516002630

PAGE 2

CALIFORNIA PROPOSITION 65:  
PRODUCT OR PRODUCT COMPONENTS ARE REGULATED UNDER CALIF. PROPOSITION 65.

CARCINOGENIC DETERMINATION:  
PRODUCT OR COMPONENTS ARE LISTED AS A POTENTIAL CARCINOGEN  
ACCORDING TO : IARC

PRODUCT TOXICITY DATA: NOT DETERMINED

PRODUCT TLV: 10 MG/M3

----- EFFECTS OF EXPOSURE -----

ROUTES OF EXPOSURE:

EYE OR SKIN CONTACT, INHALATION.

EYE:

MAY CAUSE SEVERE IRRITATION WHICH MAY BE PERSISTENT.

SKIN:

CEMENT DUST CAN BE IRRITATING TO SKIN. WET CEMENT CAN DRY THE SKIN AND  
CAUSE ALKALI BURNS. SENSITIVE INDIVIDUALS MAY DEVELOP ALLERGIC DERMATITIS.

INHALATION:

MAY BE IRRITATING.  
TREAT AS NUISANCE DUST.

INGESTION:

THIS MATERIAL IS OF VERY LOW ACUTE TOXICITY. THERE IS NO EVIDENCE OF  
ADVERSE EFFECTS FROM AVAILABLE INFORMATION.

CHRONIC EFFECTS:

CRYSTALLINE SILICA IS NOT ON THE OSHA CARCINOGEN LIST. NTP AND IARC HAVE  
DETERMINED THERE IS SUFFICIENT EVIDENCE IN HUMANS FOR THE CARCINOGENICITY  
OF INHALED CRYSTALLINE SILICA IN THE FORM OF QUARTZ OR CRISTOBALITE FROM  
OCCUPATIONAL SOURCES.

CONTAINS TRACE AMOUNTS OF ARSENIC, A CHEMICAL KNOWN TO THE STATE OF  
CALIFORNIA TO CAUSE CANCER. EXPOSURE TO ARSENIC SHOULD NOT EXCEED THE  
FEDERAL OSHA PEL UNLESS USED IN A MANNER THAT PRODUCES EXTREMELY HEAVY AIR-  
BORNE CONCENTRATIONS OF PRODUCT AT LEVELS WELL ABOVE THE ALLOWABLE LIMITS.

OTHER SYMPTOMS AFFECTED:

A REVIEW OF AVAILABLE DATA DOES NOT IDENTIFY ANY CONDITIONS WORSENERD BY  
EXPOSURE TO THIS PRODUCT.

----- EMERGENCY AND FIRST AID PROCEDURES -----

EYE:

IMMEDIATELY FLUSH EYES WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES. IF  
IRRITATION PERSISTS, SEEK PROMPT MEDICAL ATTENTION.

SKIN:

PROMPTLY WASH SKIN WITH SOAP AND WATER. IF IRRITATION DEVELOPS, SEEK MEDICAL  
ATTENTION.

INHALATION:

REMOVE TO FRESH AIR. IF IRRITATION PERSISTS, SEEK MEDICAL ATTENTION,

INGESTION:

DO NOT INDUCE VOMITING! IN GENERAL, NO TREATMENT IS NECESSARY UNLESS LARGE  
QUANTITIES ARE INGESTED. HOWEVER, MEDICAL ADVICE SHOULD BE OBTAINED.

\* \* \* \* \* SECTION VI - REACTIVITY DATA \* \* \* \* \*

STABILITY: STABLE

CONDITIONS TO AVOID:

STORE IN A DRY LOCATION.

INCOMPATIBILITY (MATERIALS TO AVOID):

NONE KNOWN.

HAZARDOUS DECOMPOSITION PRODUCTS:

NONE KNOWN.

HAZARD POLYMERIZATION: WON'T OCCUR

CONDITIONS TO AVOID:

NOT APPLICABLE.

\* \* \* \* \* SECTION VII - SPILL OR LEAK PROCEDURES \* \* \* \* \*

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:

USE PROTECTIVE EQUIPMENT. SWEEP UP AND REMOVE. AVOID CREATING OR INHALING DUST.

WASTE DISPOSAL METHOD:

IF NOT CONTAMINATED, REUSE PRODUCT.

GET APPROVAL FROM LANDFILL OPERATOR AND TRANSPORT TO SANITARY LANDFILL.

\* \* \* \* \* SECTION VIII - SPECIAL PROTECTION INFORMATION \* \* \* \* \*

RESPIRATORY PROTECTION (USE NIOSH/MSHA APPROVED EQUIPMENT):

TOXIC DUST/MIST RESPIRATOR.

VENTILATION:

USE ONLY WITH ADEQUATE VENTILATION.

PROTECTIVE GLOVES:

NORMAL WORK GLOVES.

EYE PROTECTION:

DUST PROOF GOGGLES.

OTHER PROTECTIVE EQUIPMENT:

NORMAL WORK COVERALLS.

\* \* \* \* \* SECTION IX - SPECIAL PRECAUTIONS \* \* \* \* \*

PRECAUTIONARY LABELING CEMENT - STANDARD - CLASS B - BULK 516.002630

WARNING!

CONTAINS A SMALL AMOUNT OF CRYSTALLINE SILICA, REPEATED OR PROLONGED INHALATION OF DUST MAY CAUSE A DELAYED RESPIRATORY ILLNESS (SILICOSIS). THE INTERNATIONAL AGENCY FOR RESEARCH ON CANCER (IARC) AND NTP HAVE DETERMINED THERE IS SUFFICIENT EVIDENCE OF THE CARCINOGENICITY OF CRYSTALLINE SILICA. MAY CAUSE EYE AND SKIN IRRITATION.

MAY CAUSE SKIN BURNS IF CEMENT IS WET OR WITH CONFINED INTIMATE CONTACT.

FOR PRECAUTIONARY STATEMENTS, REFER TO SECTIONS IV-VIII.

OTHER HANDLING AND STORAGE CONDITIONS:

STORE IN DRY LOCATION TO PROTECT PRODUCT QUALITY. REQUIRES COVERED STORAGE.

AVOID CREATING OR INHALING DUST.

AVOID CONTACT WITH SKIN, EYES AND CLOTHING.

CONTAINER DISPOSITION:

EMPTY CONTAINER COMPLETELY. TRANSPORT CONTAINER WITH ALL CLOSURES IN PLACE. RETURN FOR REUSE OR DISPOSE IN A SANITARY LANDFILL BY FIRST OBTAINING LANDFILL OPERATOR'S AUTHORIZATION.

\* \* \* \* \* SECTION X - TRANSPORTATION INFORMATION \* \* \* \* \*

DOT SHIPPING DESCRIPTION:

NOT RESTRICTED

\* \* \* \* \* SECTION XI - ENVIRONMENTAL EVALUATION \* \* \* \* \*

EPA SUPERFUND(SARA) TITLE III - HAZARD CLASSIFICATION & ASSOCIATED INFORMATION

FIRE: N PRESSURE: N REACTIVE: N ACUTE (IMMEDIATE): Y

CHRONIC (DELAYED): N MIXTURE OR PURE MATERIAL: MIX

B. EPA - CERCLA/SUPERFUND, 40 CFR 302 (REPORTABLE SPILL QUANTITY)

N/A

C. EPA - SARA TITLE III, CFR 355 (EXTREMELY HAZARDOUS SUBSTANCES)

PRODUCT CONTAINS NO EXTREMELY HAZARDOUS COMPONENTS

D. EPA - SARA TITLE III, 40 CFR 372 (LIST OF TOXIC CHEMICALS)

CHEMICAL CONTAINS NO TOXIC INGREDIENTS

PN: 516002630

PAGE 4

E. COMPONENTS LISTED ON FOLLOWING CHEMICAL INVENTORIES

# ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YY)

06/06/2001

PRODUCER (505)325-4561 FAX (505)327-0346

Kysar Insurance Agency, Inc.  
300 W. Arrington  
Suite 100  
Farmington, NM 87401

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

## INSURERS AFFORDING COVERAGE

INSURED YOUNG ENVIRONMENTAL SERVICES, INC. DBA ENVIRO INC.; APPLIED CATHODIC PROTECTION, INC. (ACPI)  
5796 US HWY 64  
FARMINGTON, NM 87401

INSURER A: QUAKER SPECIAL RISK

INSURER B: Mountain States Mutual

INSURER C:

INSURER D:

INSURER E:

## COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY	KZE330135EXT	06/04/2001	06/04/2002	EACH OCCURRENCE \$ 1,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				FIRE DAMAGE (Any one fire) \$ 50,000
	<input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR				MED EXP (Any one person) \$ 5,000
	<input checked="" type="checkbox"/> professional				PERSONAL & ADV INJURY \$ 1,000,000
	<input checked="" type="checkbox"/> \$5,000 Deductible				GENERAL AGGREGATE \$ 3,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:				PRODUCTS - COMP/OP AGG \$ 3,000,000
	<input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC				
B	AUTOMOBILE LIABILITY	BAP0067252 02	06/04/2001	06/04/2002	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	<input checked="" type="checkbox"/> ANY AUTO				BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident) \$
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident) \$
	<input type="checkbox"/> HIRED AUTOS				
	<input type="checkbox"/> NON-OWNED AUTOS				
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT \$
	<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC \$
					AUTO ONLY: AGG \$
A	EXCESS LIABILITY	IXG372061EXT	06/04/2001	05/04/2002	EACH OCCURRENCE \$ 1,000,000
	<input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE \$ 1,000,000
		AUTOMOBILE EXCESS			\$ 0
	<input type="checkbox"/> DEDUCTIBLE				\$
	<input type="checkbox"/> RETENTION \$				\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WC STATUTORY LIMITS OTHER
					E.L. EACH ACCIDENT \$
					E.L. DISEASE - EA EMPLOYEE \$
					E.L. DISEASE - POLICY LIMIT \$
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS

## CERTIFICATE HOLDER

ADDITIONAL INSURED; INSURER LETTER

## CANCELLATION

STATE OF NEW MEXICO  
EMNRD OCD  
MS. MARTYNE J. KIELING  
2040 S. PACHECO  
SANTA FE, NM 87505

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

## **IMPORTANT**

If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

## **DISCLAIMER**

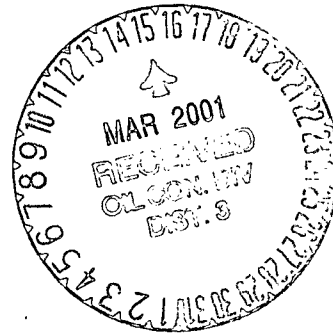
The Certificate of Insurance on the reverse side of this form does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

# 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: Closure of Landfarm #2 (Main Cells), Unit 4 and Unit 5 East of the "N" Line.

Dear Ms. Kieling

Envirotech Inc. has completed closure sampling and obtained "Discontinued Maintenance Status" for all cells in Envirotech's Soil Remediation Facility Landfarm #2 (Mail Cell), Unit 4 and Unit 5 east of the "N" line as stated in the letters dated: February 7, 1996; June 3, 1996; April 23, 1997; January 13, 1998; April 17, 1998; November 18, 1999; January 13, 2000; February 17, 2000; April 4, 2000; August 3, 2000 and October 13, 2000.

It is our intention to leave perimeter fences and internal berms in place for the foreseeable future. Fencing will restrict access by livestock and when suitable seed mix is applied for ground cover. Internal berms will aid in the control of runoff and erosion. The berm currently in place surrounding the blending facility in the main section of Landfarm #2 will also be kept in place for further use. We currently have a recommended custom seed mix for dry pasture for 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.

Attached is a list of cells that are empty within Landfarm #2 (Main Cells), Unit 4 and Unit 5 East of the "N" Line.

Respectfully submitted,  
Envirotech Inc.

*Christine M. Walters*

Christine M. Walters  
Laboratory Coordinator / Environmental Scientist



Empty cells located in Landfarm #2:

**Landfarm #2:**

E - 22, 23, 25  
F - 20, 21, 22, 23, 24, 25, 26  
G - 16, 17, 19, 20  
H - 17  
I - 17, 18, 21  
J - 14, 15, 16, 17, 21, 24  
K - 14, 15, 16, 21, 24, 25  
L - 21, 22, 23, 24  
M - 16, 21, 22, 23  
N - 20  
O - 19, 20  
P - 18, 19

**Landfarm #2 Unit 4:**

A - 5, 6, 9, 11, 12, 13  
D - 6  
E - 6, 7  
F - 4, 6, 7  
G - 4, 6  
H - 3  
I - 3, 4  
K - 3

**Landfarm #2 Unit 5:**

None



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

May 2, 2001

**Lori Wrotenbery**

Director

**Oil Conservation Division**

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7099-3220-0000-5051-2306**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 December 1, 2000 and April 11, 2001 requesting discontinued maintenance status. Based on the information provided the following Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Unit 5 Cells December 1, 2000 letter**

Cell F-10	Cell H-10	Cell I-10	Cell J-10	Cell L-9
Cell G-10	Cell I-9	Cell J-9	Cell K-9	Cell M-9

**Landfarm #2 Unit 5 Cells April 11, 2001 letter**


Cell S-5	Cell T-6	Cell U-6	Cell V-7	Cell W-8	Cell X-9
Cell S-6	Cell T-7	Cell U-7	Cell V-8	Cell W-9	Cell X-10
Cell S-7	Cell T-8	Cell U-8	Cell V-9	Cell W-10	Cell X-11
Cell S-8	Cell T-9	Cell U-9	Cell V-10	Cell W-11	Cell Y-10
Cell S-9	Cell T-10	Cell U-10	Cell V-11	Cell W-12	Cell Y-12

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, local laws and/or regulations.

Mr. Morris Young  
May 2, 2001  
Page 2

If you have any questions please do not hesitate to contact me at (505) 476-3488.

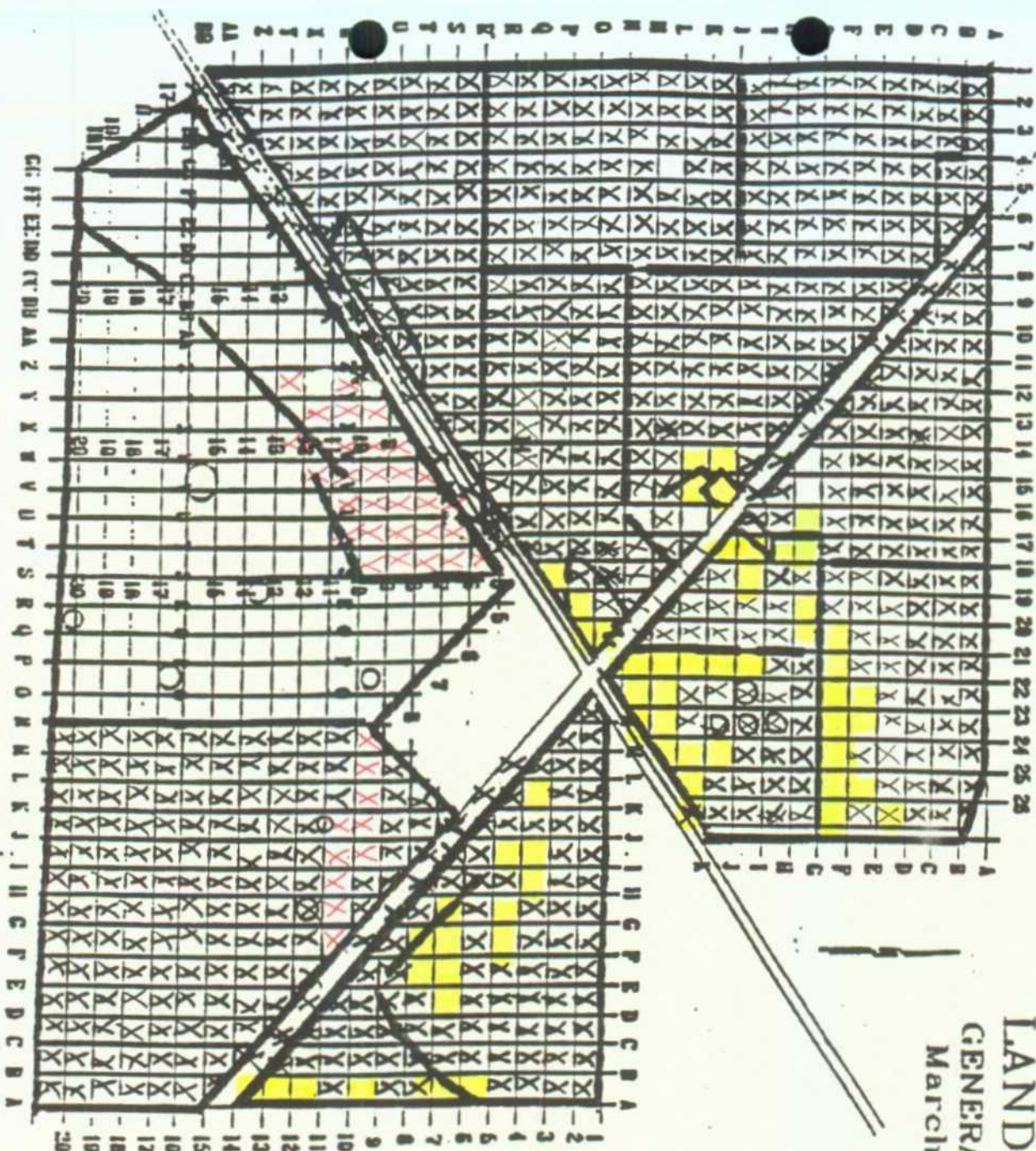
Sincerely,

  
Martyne J. Kieling  
Environmental Geologist

xc:     OCD Aztec Office

LANDFARM #2  
GENERAL SITE MAP  
March 16, 1998

March 16, 1998



X	Approved	1996	February 7, June 3
X	Approved	1997	April
X	Approved	1998	April 17
X	Approved	1999	NOVEMBER 18
X	Approved	2000	JANUARY 13
X	Approved	2000	February 17
X	Approved	2000	April 4
<input checked="" type="checkbox"/>	Empty Cells	Letter 3-10-2000	Envtlth
	Noted		
X	Approved	2000	August 3
	Unit #4		
X	Approved	2000	October 13
X	Approved	2001	MAY 2

Unit #5

# ENVIROTECH INC.

**PRACTICAL SOLUTIONS FOR A BETTER TOMORROW**

April 11, 2001

**RECEIVED**

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

**APR 17 2001**  
Environmental Bureau  
Oil Conservation Division

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 # 2 Unit 5, Hilltop, New Mexico.

Cells:

S-5, S-6, S-7, S-8, S-9

T-6, T-7, T-8, T-9, T-10

U-6, U-7, U-8, U-9, U-10

V-7, V-8, V-9, V-10, V-11

W-8, W-9, W-10, W-11, W-12

X-9, X-10, X-11

Y-10 AND Y-12

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

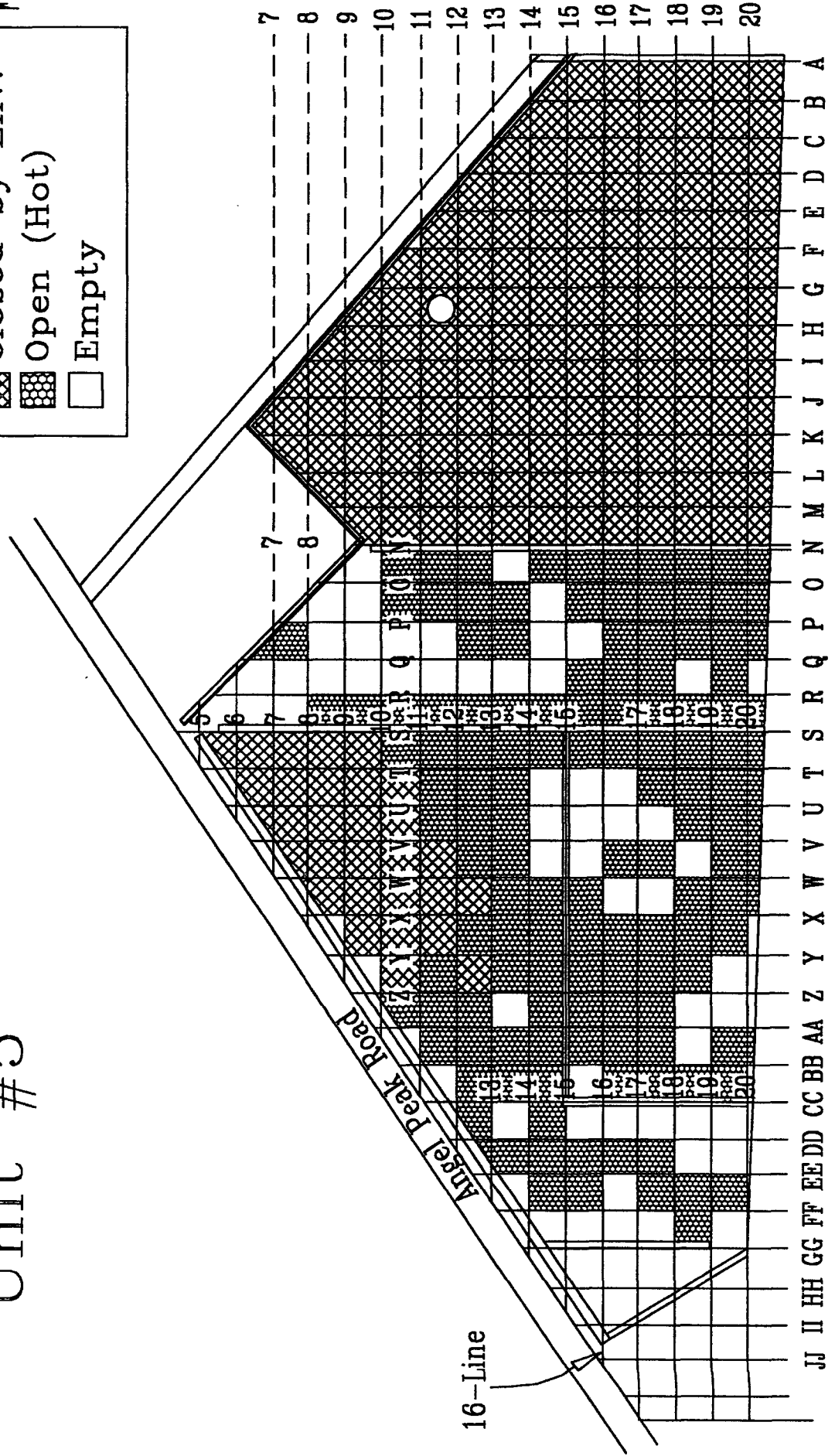
RECEIVED

APR 17 2001

Environmental Bureau  
Oil Conservation Division

# Envirotech Inc. Landfarm #2 Unit #5

KEY	
	Closed by OCD
	Closed by Env.
	Open (Hot)
	Empty





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

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time 2:15 Date 12-5-00

Originating Party

Denny Foust  
Harlin Brown

Other Parties

Martynne Kieling

Subject EnviroTech Accidental Dump at the Land Farm

WGPL West cisco to Rangeland Product Pig Cleaning Waste.  
3 Drums of Wash Water From Pig.

Discussion Waste was originally Miss Represented by WGPL West  
Ragging Contractor as Exempt. WGPL West Personnel  
Corrected the it to Non Exempt Product line. The waste was  
Then tested TCLP and was Found to be Hazardous.  
Arsenic at 14 and Benzene at 7.5.

By Miss Direction By Morris Young the Drums were  
Sent to <sup>the OCS</sup> Land Farm and Dumped. With in 1 Hour  
Harlin Brown Had it Picked up and placed in to  
2 1Cu Boxes. It has been Re tested by another lab.  
This test showed it was Non Hazardous. The  
waste Soil will be Handled by EnviroSolve and Shipped  
to a Class I RCRA Haz waste Facility most likely in Oklahoma.

Conclusions or Agreements EnviroTech will send OGD a written Report  
on the Incident and Follow up with Confirmatory Samples  
To Prove that all Material was Picked up and Removed.  
From Land Farm

Martynne Kieling will Call Debbie Brinkerhoff to Discuss

Distribution

Signed

Martynne J. Kieling



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

October 13, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7099-3220-0000-5051-1309**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 June 5, 2000 requesting discontinued maintenance status. Based on the information provided the following Main (NW) Cells and Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Unit 5 Cells

Cell D-24	Cell E-26	Cell P-10	Cell Q-13	Cell R-8
Cell D-26	Cell G-13	Cell Q-12	Cell Q-14	

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, local laws and/or regulations.

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

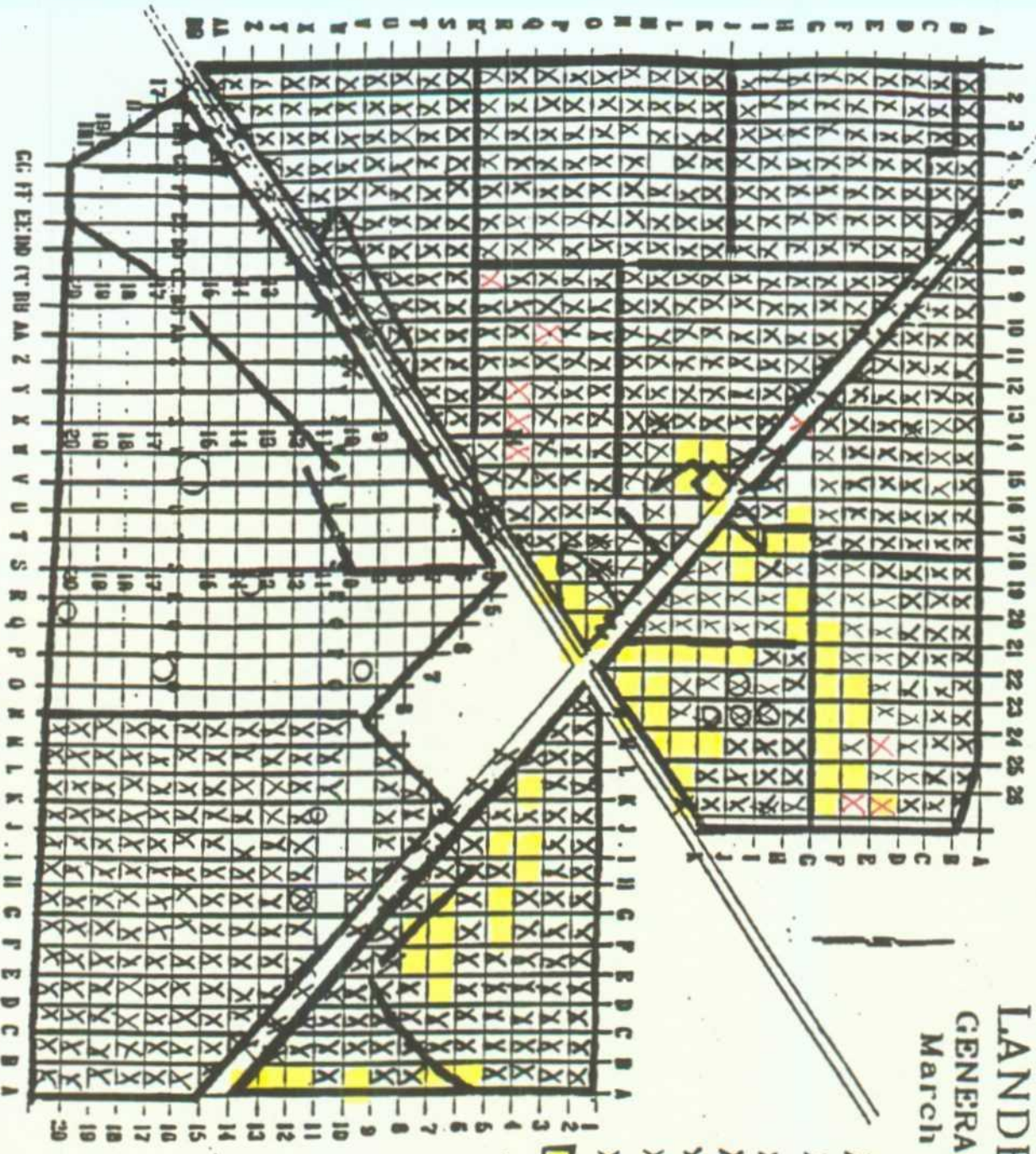
Sincerely,

Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- X Approved 2000 August 3
- Unit #4
- X Approved 2000 October 13

Empty Cells Letter 3-10-2000 Envirotech Notified

Unit #5

CG: FT EX: MD (TV) DR AA 2 Y X W V U T S R Q P O N M L K J I H G F E D C B A



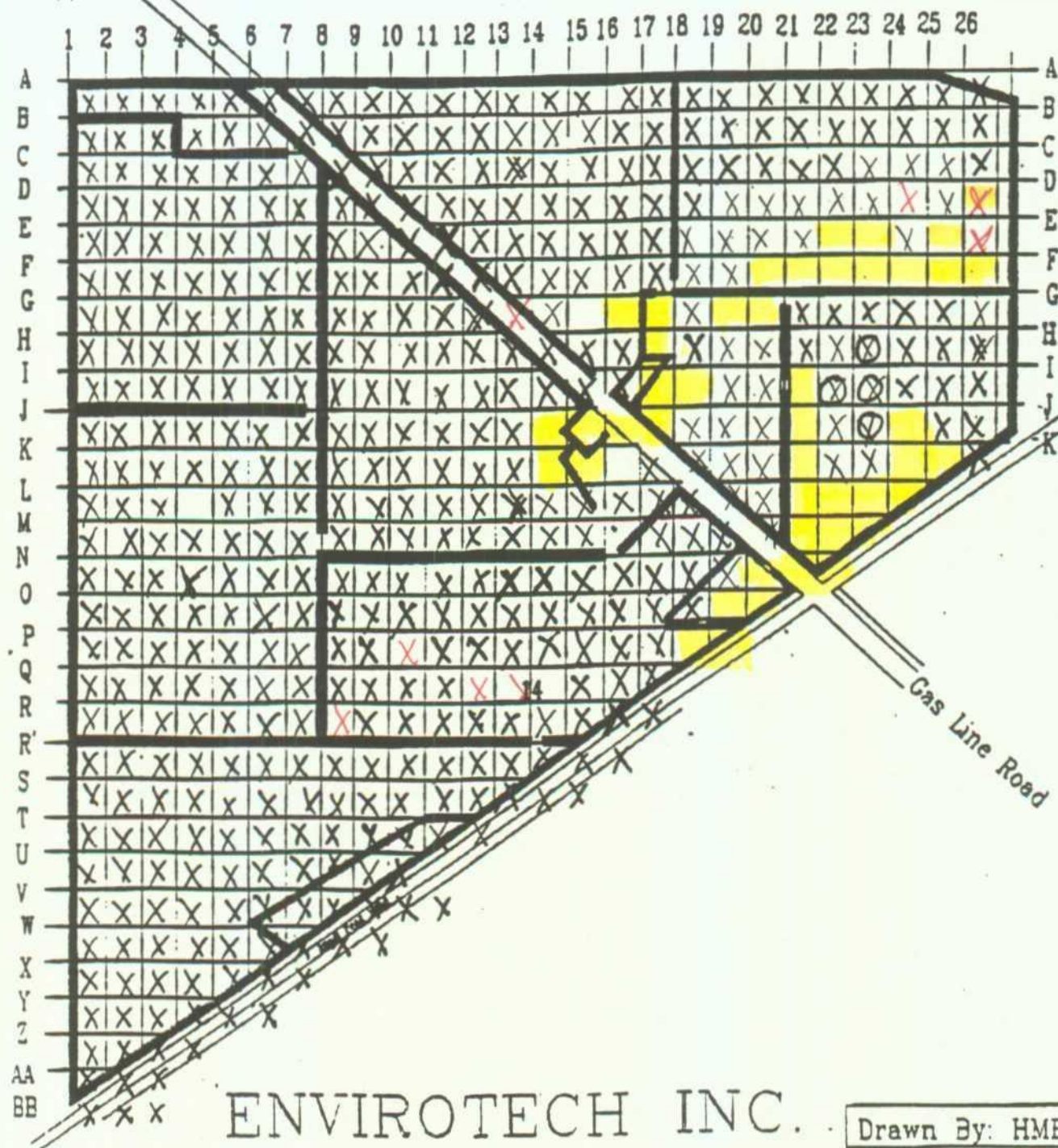
X Approved 1996 February 7, June 3  
 X Approved 1997 April  
 X Approved 1996 April 17  
 X Approved 1999 NOVEMBER 18  
 X Approved 2000 JANUARY 13  
 X Approved 2000 February 17

X Approved 2000 April 4

□ Empty Cells Not used Env Letter 3-b-00

X Approved 2000 August 3

X APPROVED 2000 OCTOBER 13



ENVIROTECH INC.  
 LANDFARM #2

Drawn By: HMB

Revised: 3-16-98



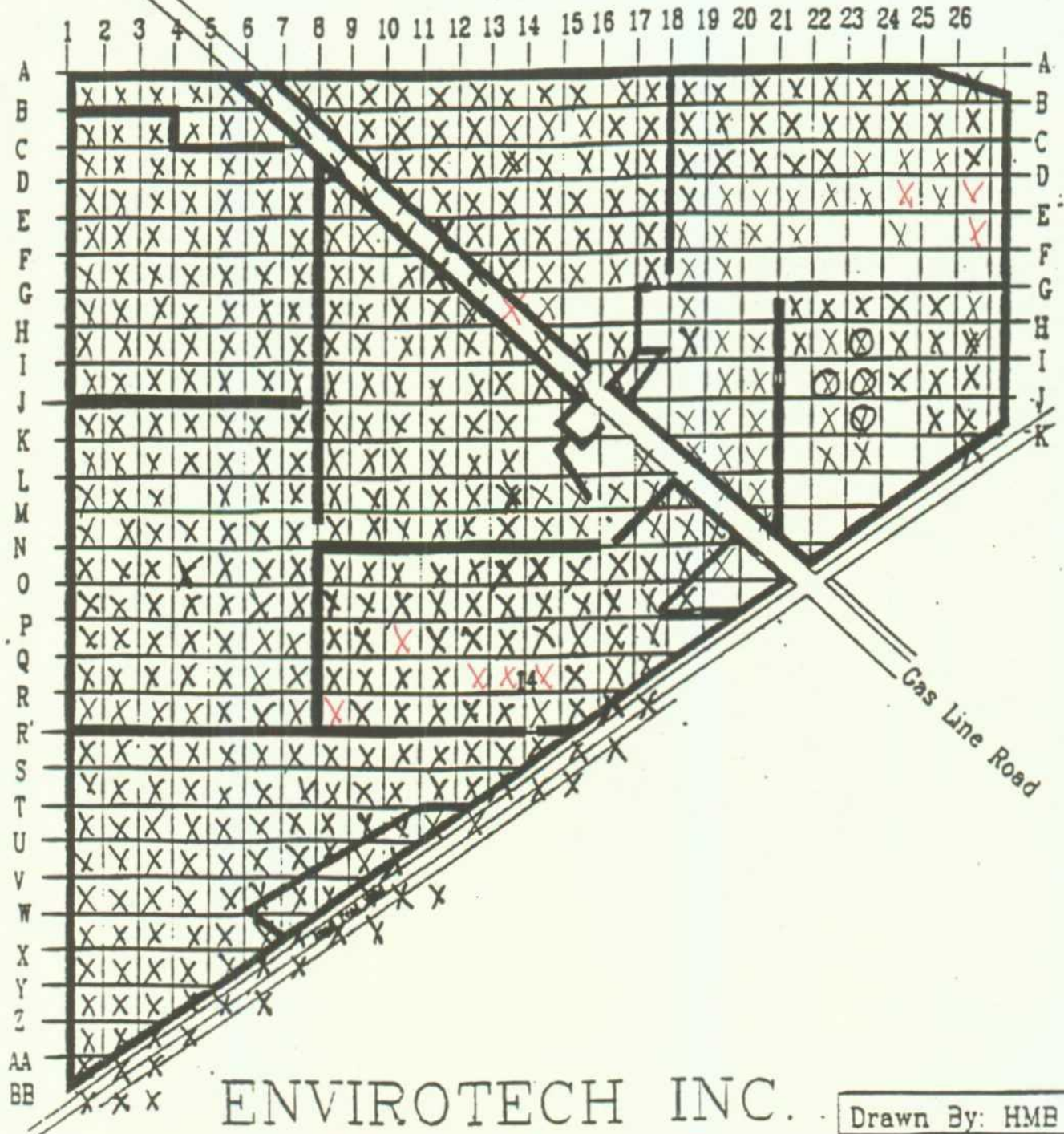
X Approved 1996 February 7, June 3  
 X Approved 1997 April  
 X Approved 1996 April 17  
 X Approved 1999 NOVEMBER 18  
 X Approved 2000 JANUARY 13  
 X Approved 2000 February 17

X Approved 2000 April 4

☐ Empty cells Not used Env Letter 3-b-00

X Approved 2000 August 3

X APPROVED 2000 OCTOBER 13



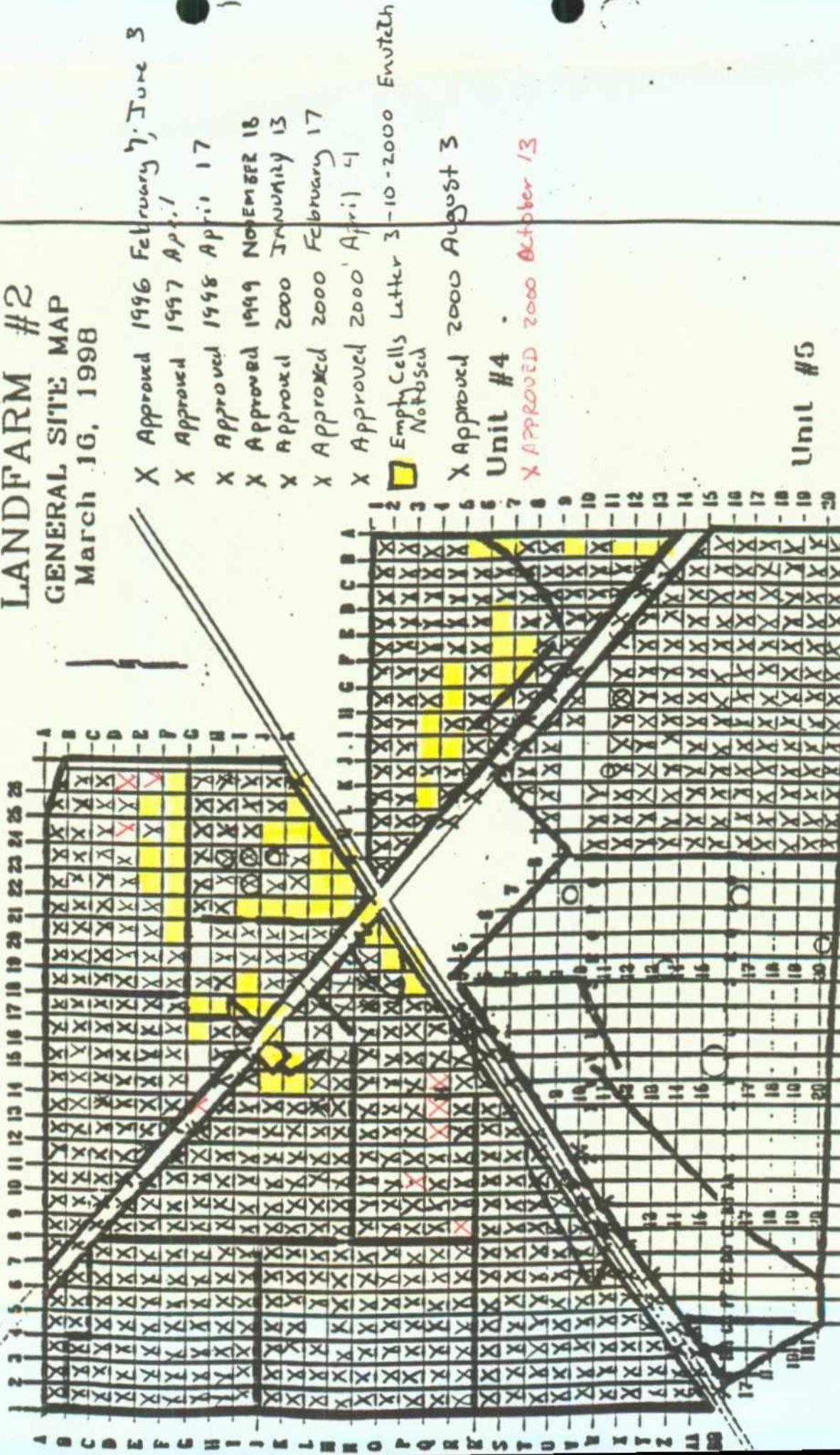
ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB

Revised: 3-16-98



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



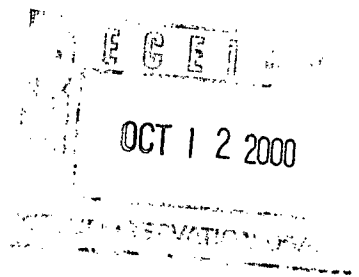
GC 17 EE:ND (V'DU AA 2 Y X W V U T S R Q P O N M L K J I H G F E D C B A

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

September 26, 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 # 2 Unit 5, Hilltop, New Mexico.

Cells:

✓ D-24, D-26, E-26, G-13, P-10, Q-12, Q-13, Q-14 AND R-8

The approval sheets, dated 9/20/99, 9/21/99 and 9/26/99, for these cell are attached.

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



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

Jennifer A. Salisbury

Cabinet Secretary

**Lori Wrotenbery**

Director

Oil Conservation Division

August 3, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 5051-0968**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 June 5, 2000 requesting discontinued maintenance status. Based on the information provided the following Main (NW) Cells and Unit 5 Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

**Landfarm #2 Main (NW) Cells**

Cell F-12	Cell K-17	Cell K-26	Cell L-16	Cell M-15	Cell M-19
Cell G-15	Cell K-22	Cell L-14	Cell L-17	Cell M-17	
Cell J-23	Cell K-23	Cell L-15	Cell L-18	Cell M-18	

**Landfarm #2 Unit 5 Cells**

Cell B-13	Cell C-17	Cell C-17	Cell G-11	Cell I-11	Cell J-12
Cell C-12	Cell D-11	Cell E-11	Cell H-12	Cell J-6	Cell K-12
					Cell K-13

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, local laws and/or regulations.

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

Sincerely,

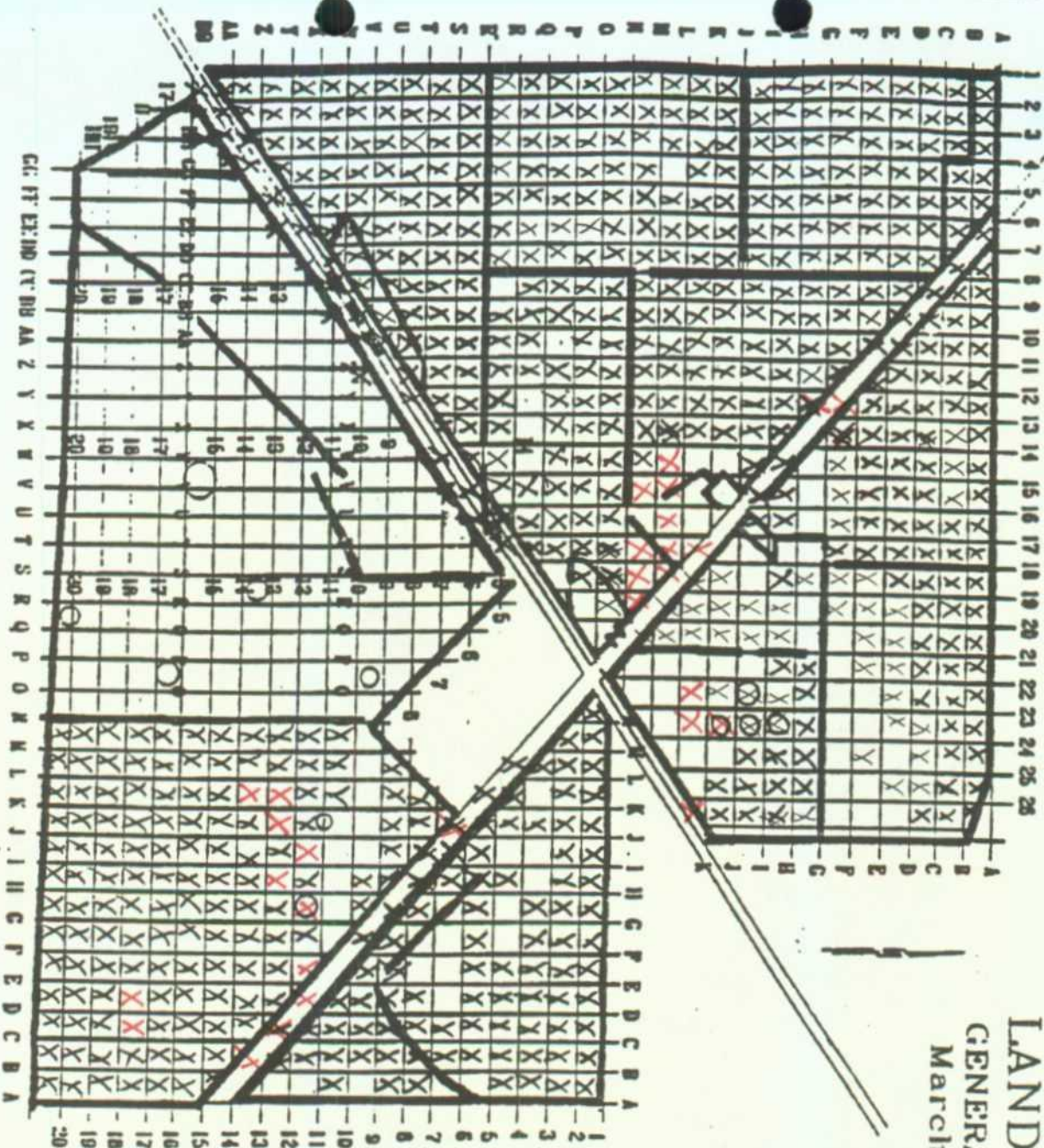
A handwritten signature in cursive script, appearing to read "Martyne J. Kieling".

Martyne J. Kieling  
Environmental Geologist

xc:   OCD Aztec Office



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envirotech Notified
- X Approved 2000, August 3

Unit #4

Unit #5

Cell: FT EX: MD (Y) DB: AA Z Y X W V U T S R Q P O N M L K J I H G F E D C B A

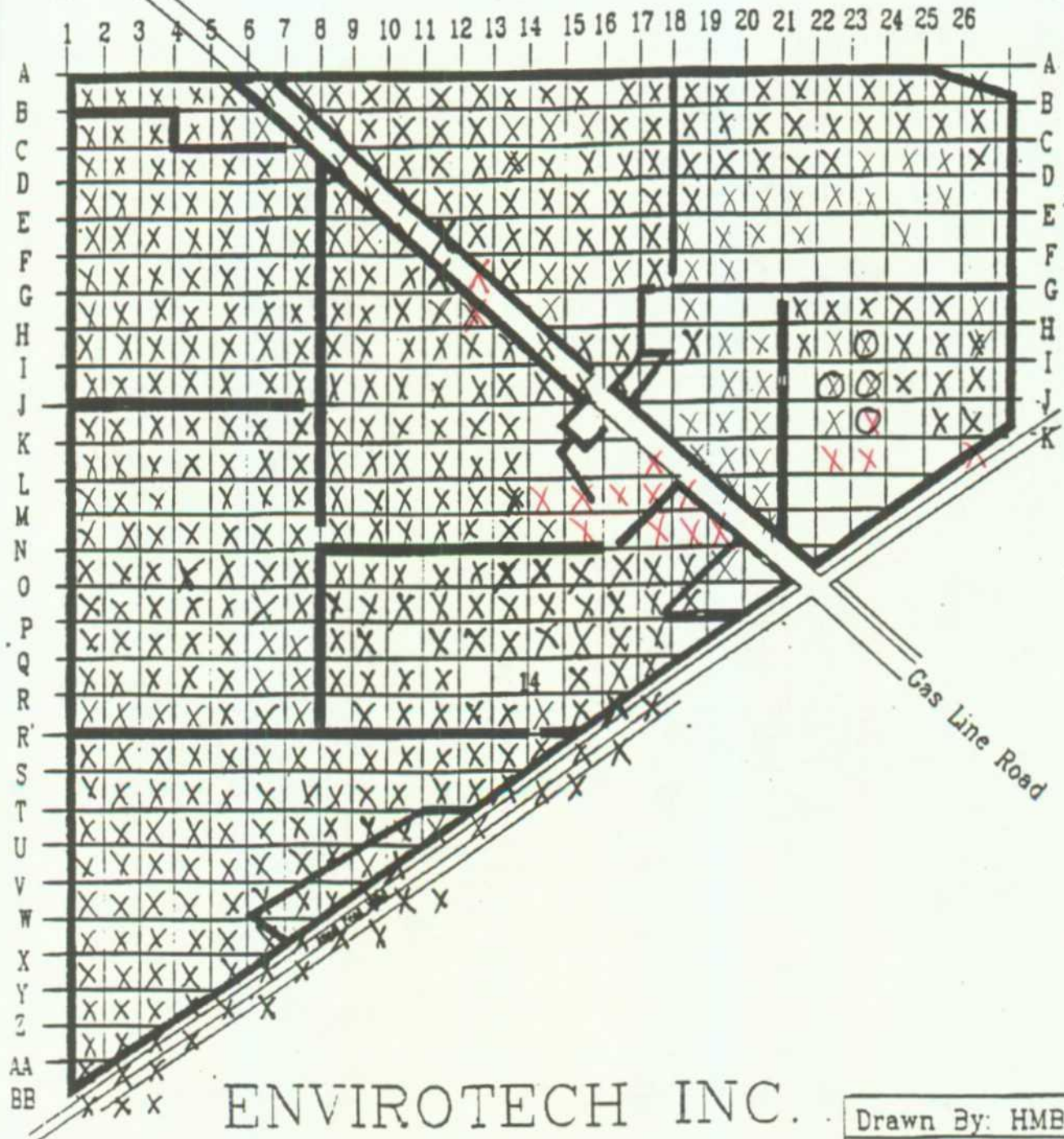


X Approved 1996 February 7, June 3  
 X Approved 1997 April  
 X Approved 1996 April 17  
 X Approved 1999 NOVEMBER 18  
 X Approved 2000 JANUARY 13  
 X Approved 2000 February 17

X Approved 2000 April 4

☐ Empty Cells Not used Env Letter 3-b-00

X Approved 2000 August 3



Drawn By: HMB

Revised: 3-16-98



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**

Governor

**Jennifer A. Salisbury**

Cabinet Secretary

**Lori Wrotenbery**

Director

**Oil Conservation Division**

July 26, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-559-573-323**

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

**RE:**

**Surface Waste Management Facility Inspection Report: Permit NM-01-00211  
Envirotech, Inc.  
NW/4 of Section 6, Township 26 North, Range 10 West, NMPM  
San Juan County, New Mexico**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) inspected the Envirotech, Inc. (Envirotech) commercial surface waste management facility at the above location on May 15, 2000. Overall the OCD found Envirotech to have a well maintained landfarm with good security. The OCD inspection and file review of Envirotech indicate some permit deficiencies. Attachment 1 lists the permit deficiencies found at Envirotech during the inspection and file review. Attachment 2 contains photographs taken during the inspection. Envirotech shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. Envirotech must respond to the permit deficiencies by August 26, 2000.

A review of Envirotech's financial assurance finds that Envirotech's \$35,000 surety bond No. RLIB0002253 is current and active.

If you have any questions please contact Martyne Kieling at (505) 827-7153.

Sincerely,

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

Martyne J. Kieling  
Environmental Geologist

Attachments

xc: Aztec OCD Office

ATTACHMENT 1  
INSPECTION REPORT  
PERMIT NM-01-0011  
ENVIROTECH, INC.

NW/4 of Section 6, Township 26 North, Range 10 West, NMPM  
San Juan County, New Mexico  
(July 26, 2000)

1. Fencing and Signs: The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information: a) name of facility, b) location by section, township and range, and c) emergency phone number.

**Facility is secured with fence and locking gate and has a sign at the entrance.**

2. Berming: An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

**Cell berms are in good shape and well maintained.**

3. Setbacks: All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within twenty-five (25) feet of the boundary of the facility and the landfarm facility may not be constructed within one-hundred (100) of adjacent landowners' property. No contaminated soil will be placed within twenty (20) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

**The facility set backs are maintained.**

4. Soil Spreading, Disking and Lift Thickness: All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

**At the time of inspection, soils in each cell had been spread and disked accordingly.**

5. Free Liquids: No free liquids or soils with free liquids will be accepted at the facility.

**No free liquids were observed within the landfarm**

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

**There was no plastic or trash in the landfarm (see photos 1 and 2).**

7. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable pad within the berm so that leaks can be identified.

**N/A There are no above ground tanks located at this facility.**

8. Sumps and Valve Catchments: All sumps and catchments must be kept empty so that leaks can be identified and to prevent overflow onto the ground.

**N/A There are no sumps or catchments located at this facility.**

9. Concrete Mixing Impoundment: Adequate freeboard must be maintained to prevent any overtopping or slop over of material. Material received at the impoundment must be mixed and stabilized immediately.

**Material in the impoundment was mixed (see photo 3). Adequate freeboard was maintained.**

10. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

**N/A There are no drums located at this facility.**

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

11. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

**N/A There are no saddle tanks located at this facility.**

12. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

**N/A**

13. Migratory Bird Protection: All tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted, covered or otherwise rendered not hazardous to migratory birds.

N/A

14. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the appropriate OCD District Office.

**At the time of inspection, there were no spills evident at this facility**

15. Regular Facility Inspections: Cells must be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants. Facility inspections and maintenance must be conducted on at least a biweekly basis and immediately following each consequential rainstorm or windstorm.

**To date biweekly inspection records have not been kept to indicate all disking and facility inspections are being performed as required. Records of materials accepted into the facility and treatment zone monitoring on file at facility location date back to 1992.**

**Envirotech must begin a biweekly facility inspection log. Envirotech must also begin submitting a copy of the quarterly treatment zone monitoring reports to the OCD Santa Fe office.**

16. H<sub>2</sub>S Screening: H<sub>2</sub>S screening must be recorded and maintained.

N/A

17. Waste Acceptance and Disposal Documentation: The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification; 6) NORM status declaration; 7) transporter; 8) exact cell location; and 9) any addition of microbes moisture, fertilizers, *etc.*

**Records indicate all waste acceptance and disposal records are being kept and maintained as required.**



Photo 1            May 15, 2000  
Landfarm looking west.

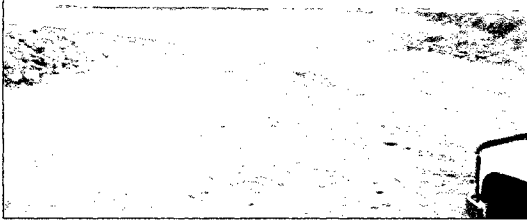


Photo 2            May 15, 2000  
Landfarm looking south.

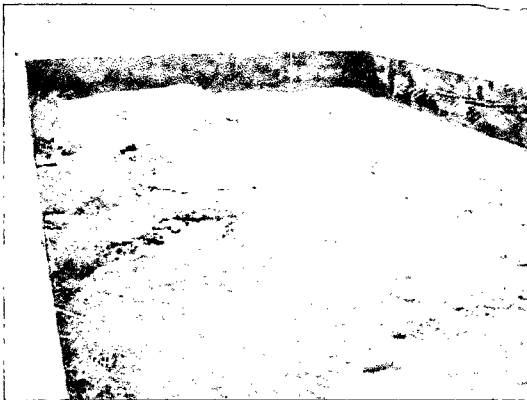


Photo 3            May 15, 2000  
Concrete mixing impoundment

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

July 11, 2000

Office (505) 827-7152  
Fax (505) 827-8177

Mr. Roger Anderson  
Environmental Bureau Chief  
NM EMNRD, OCD  
2040 S. Pacheco  
Santa Fe, NM 87505

**RE: OCD RULE 711 PERMIT APPROVAL NM-01-0011  
ENVIROTECH INC., COMMERCIAL LANDFARM  
NW/4 OF SECTION 6, TOWNSHIP 26 NORTH, RANGE 10 WEST, NMPM  
SAN JUAN COUNTY, NM**


Dear Mr. Anderson:

Envirotech Inc. is requesting a one-week time extension to produce proof of financial assurance to the Division of Oil Conservation Division for the above referenced facility. The financial assurance is specified as a surety, cash bond, or a letter of credit in the amount of \$34,000 which is the estimated costs of closure.

We request an extension until July 17, 2000.

If you have questions, please call me at (505) 632-0615.

Sincerely,  
ENVIROTECH INC.

  
Morris D. Young  
President

MDY:vayl0711OCD.doc

# envirotech memo/fax

to:

Roger - Anderson

company:

Environmental Bureau Chief

fax #:

(505) 827-8177

re:

date:

July 11, 2000

pages:

2

(including cover page)

project:

cc:

comments...

Hard copy to follow in the  
mail -

from the desk of...

MDY / KAH

envirotech inc.  
5796 us highway 64  
farmington, n. m. 87401  
505 . 632 . 0615  
505 . 632 . 1865 fax



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



June 5, 2000

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

RECEIVED

JUN 14 2000

Environmental Bureau  
Oil Conservation Division

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 # 2, Hilltop, New Mexico.  
Cells:

F-12, G-15, J-23, K-17, K-22, K-23, K-26,

L-14, L-15, L-16, L-17, L-18,

M-15, M-17, M-18 AND M-19.

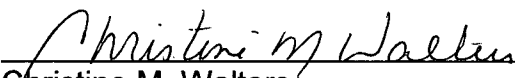
Landfarm # 2 Unit 5  
Cells:

<sup>13</sup>  
B-12, C-12, C-17, D-11, D-17, E-11,

G-11, H-12, I-11, J-6, J-12, K-12 AND K-13

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

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal Time 9:27 Date 4-5-00

Originating Party

Harlin Brown

Other Parties

Marlyne Kieling

Subject Bentonite & Soil From Horizontal Borehole  
Drilled Under Highway For a Williams Field Services  
8" Pipeline.

Discussion Request that Drill cuttings (Bentonite & Dirt) Be  
Spread on Envirotech Land Farm #1 Roads.

No additives Just Bentonite & Soil.

Conclusions or Agreements I Gave Verbal Approval to Road Spread  
Material & Three Truck loads on Land Farm Roads

mjk

Distribution

Signed

Marlyne Kieling



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

April 4, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-290**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 dated March 3, 2000 and March 10, 2000 requesting discontinued maintenance status. Based on the information provided the following Main (NW) Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Main (NW) Cells

Cell C-23	Cell D-23	Cell F-18	Cell H-22	Cell J-18	Cell L-19
Cell C-24	Cell D-25	Cell F-19	Cell H-23	Cell J-19	Cell L-20
Cell C-25	Cell E-18	Cell G-14	Cell H-26	Cell J-20	Cell M-20
Cell D-19	Cell E-19	Cell G-18	Cell I-19	Cell J-22	Cell N-19
Cell D-20	Cell E-20	Cell G-26	Cell I-20	Cell K-18	
Cell D-21	Cell E-21	Cell H-19	Cell I-22	Cell K-19	
Cell D-22	Cell E-24	Cell H-20	Cell I-23	Cell K-20	

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, local laws and/or regulations.

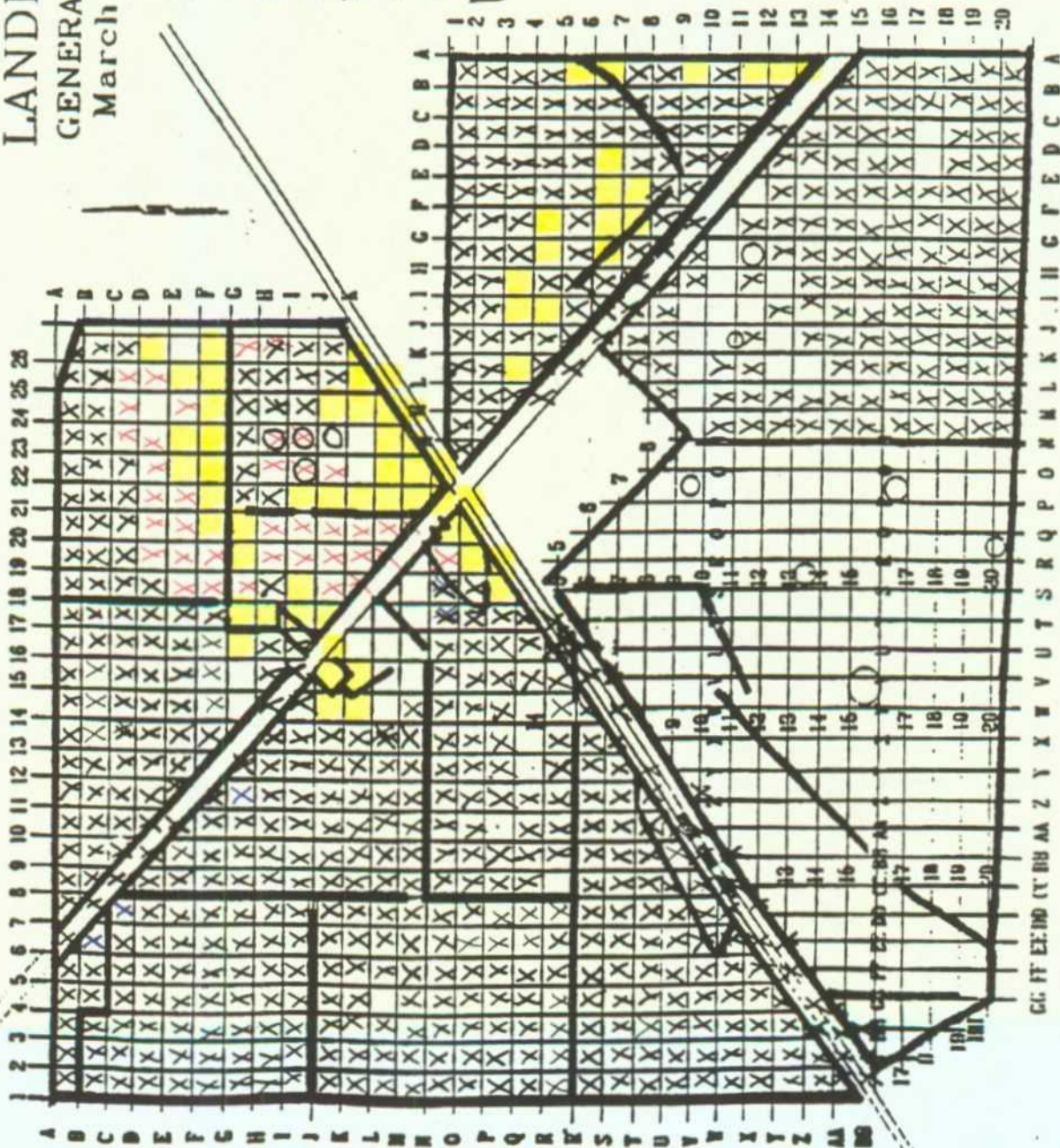
If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4
- Empty Cells Letter 3-10-2000 Envirotech Noted

Unit #4

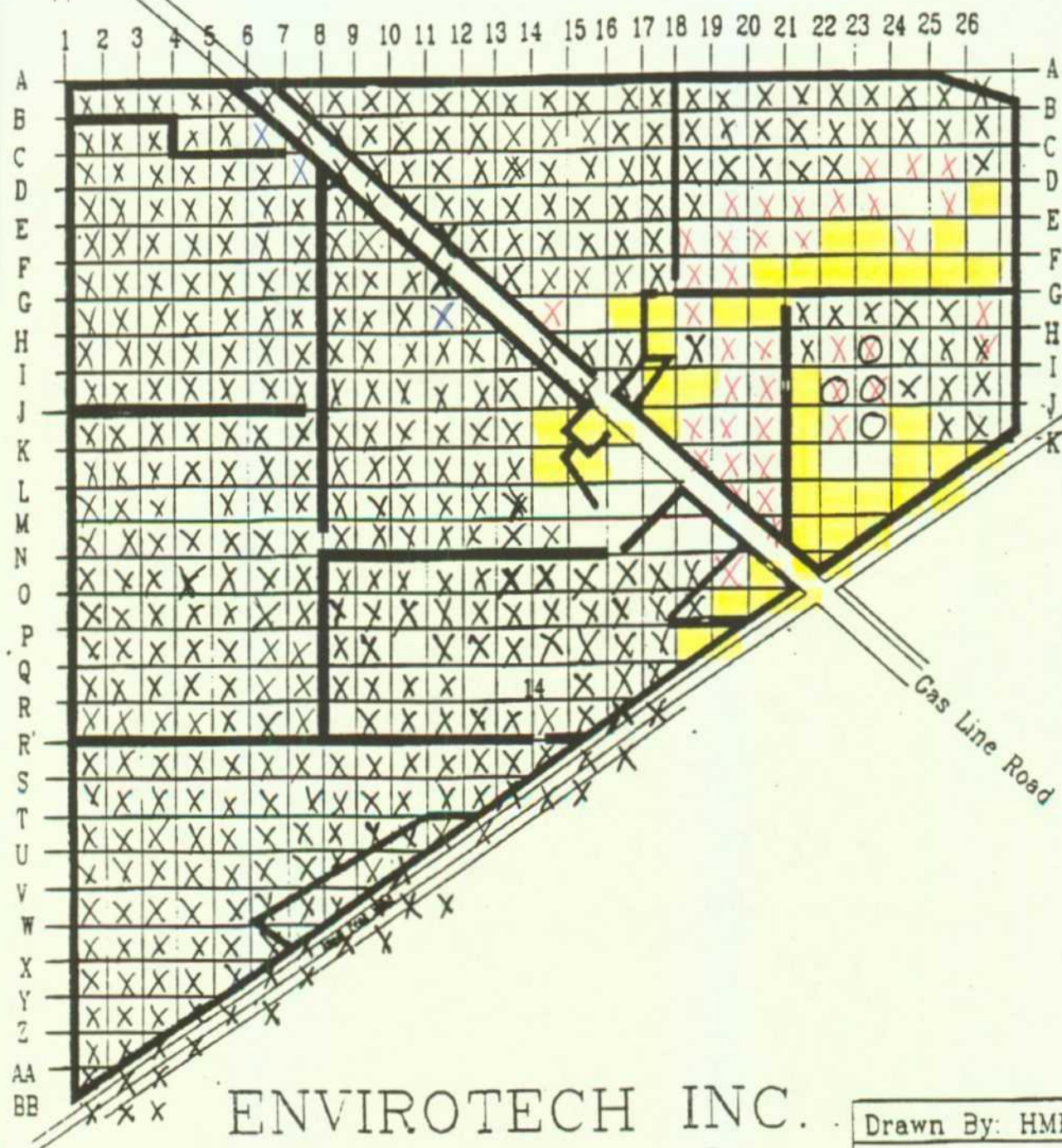
Unit #5



X Approved 1996 February 7, June 3  
X Approved 1997 April  
X Approved 1996 April 17  
X Approved 1999 NOVEMBER 18  
X Approved 2000 JANUARY 13  
X Approved 2000 February 17

X Approved 2000 April 4

Empty Cells Not used Env Letter 3-b-00



ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB

Revised: 3-16-98

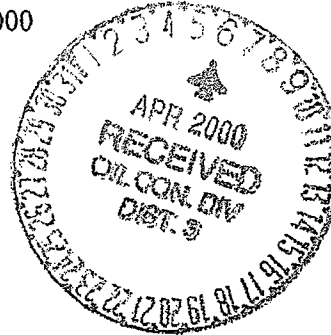


NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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,

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-599-573-289**

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, L-14 and L 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. Kiefling  
Environmental Geologist

xc: OCD Aztec Office

Env. #2

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

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal Time 8:30 Date 4-2

Originating Party Harlin Brown Other Parties Martyn Kieley  
Permit modification

Subject \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_




Discussion Add Belending Area Back into Facility  
Close Unit Original permit of land Farm 2  
unit  
Close Everything north of Ayle Peak Road  
1 to 2 acres

Conclusions or Agreements Permit Modification! Harlin will  
Send a letter with requested changes.

Distribution \_\_\_\_\_ Signed Martyn J Kieley



# Envirotech Inc. Landfarm #2 Unit #5

KEY	
	GATE
	ROAD
	DIRT WORK

Envirotech, S/W/OA



DIRT WORK REQUIRED FOR  
 RUNOFF CONTROL



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

April 4, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-290**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 dated March 3, 2000 and March 10, 2000 requesting discontinued maintenance status. Based on the information provided the following Main (NW) Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Main (NW) Cells

Cell C-23	Cell D-23	Cell F-18	Cell H-22	Cell J-18	Cell L-19
Cell C-24	Cell D-25	Cell F-19	Cell H-23	Cell J-19	Cell L-20
Cell C-25	Cell E-18	Cell G-14	Cell H-26	Cell J-20	Cell M-20
Cell D-19	Cell E-19	Cell G-18	Cell I-19	Cell J-22	Cell N-19
Cell D-20	Cell E-20	Cell G-26	Cell I-20	Cell K-18	
Cell D-21	Cell E-21	Cell H-19	Cell I-22	Cell K-19	
Cell D-22	Cell E-24	Cell H-20	Cell I-23	Cell K-20	

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, 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

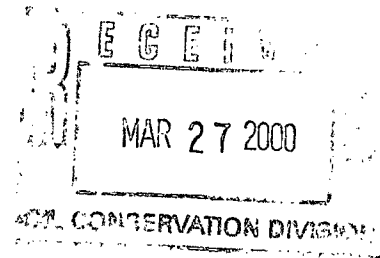
xc: OCD Aztec Office

# 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      m 16<sup>?</sup>

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

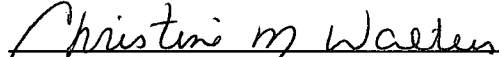
H - 3

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



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

RECEIVED APR 29 1997

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87506  
(505) 827-7131

April 23, 1997

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-326-936-278**

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 cells of Land Farm # 2 are hereby approved for discontinued maintenance status or the addition of successive lifts:

Cell A-5	Cell B-6	Cell C-11	Cell D-15
Cell A-6	Cell B-7	Cell C-12	Cell D-16
Cell A-7	Cell B-8	Cell C-14	Cell D-17
Cell A-8	Cell B-9	Cell C-15	Cell D-18
Cell A-10	Cell B-10	Cell C-16	Cell E-11
Cell A-12	Cell B-11	Cell C-17	Cell E-12
Cell A-15	Cell B-16	Cell C-18	Cell E-14
Cell A-16	Cell B-17	Cell C-20	Cell E-15
Cell A-17	Cell B-18	Cell C-21	Cell E-16
Cell A-18	Cell B-21	Cell C-22	Cell E-17
Cell A-19	Cell B-22	Cell C-26	Cell F-11
Cell A-20	Cell B-23	Cell D-8	Cell F-13
Cell A-21	Cell B-24	Cell D-11	Cell F-17
Cell A-22	Cell B-25	Cell D-12	Cell G-24
Cell A-23	Cell B-26	Cell D-13	Cell G-25
Cell A-25	Cell C-7	Cell D-14	Cell H-24
Cell A-26	Cell C-8	Cell D-15	Cell H-25

Mr. Young  
April 23, 1997  
Page 2 of 2

Cell I-15  
Cell I-24  
Cell I-25  
Cell I-26

Cell J-1  
Cell J-2  
Cell J-3  
Cell J-4

Cell J-5  
Cell J-6  
Cell J-7  
Cell J-25

Cell J-26  
Cell K-5  
Cell K-6  
Cell K-7  
Cell M-13

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 4 cells of Land Farm # 2 were not approved due to excessive holding time prior to analysis:

Cell H-23

Cell I-22

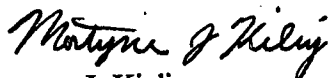
Cell I-23

Cell J-23

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. Kielling  
Environmental Geologist

xc: OCD Aztec Office





STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

February 7, 1996

CERTIFIED MAIL  
RETURN RECEIPT NO. Z-765-962-614

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13
Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

May 29, 1996

Dear Mark,

Here is the list of Landfarm Cells that has been approved by NMOCD which do not require any further disking. According to the analytical results and the documentation, all these Cells are from Landfarm #2 located at Hilltop, New Mexico. Thank you,

Al Chaharlang

c:\file\landfarm\cell-c



**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-326-936-418**

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 unit 4 cells of Land Farm # 2 are hereby approved for discontinued maintenance status:

Cell A-11	Cell N-8	Cell P-4	Cell R-10
Cell A-24	Cell N-9	Cell P-5	Cell R-11
Cell B-12	Cell N-10	Cell P-8	Cell R-13
Cell C-19	Cell N-11	Cell P-17	Cell R-16
Cell K-4	Cell N-12	Cell Q-1	Cell R'-1
Cell L-8	Cell N-17	Cell Q-2	Cell R'-2
Cell L-9	Cell N-18	Cell Q-3	Cell R'-3
Cell L-13	Cell O-1	Cell Q-4	Cell R'-4
Cell M-5	Cell O-2	Cell Q-5	Cell R'-5
Cell M-6	Cell O-3	Cell Q-8	Cell R'-6
Cell M-9	Cell O-4	Cell Q-9	Cell R'-7
Cell N-1	Cell O-5	Cell Q-10	Cell R'-8
Cell N-2	Cell O-7	Cell Q-11	Cell R'-9
Cell N-3	Cell O-17	Cell Q-16	Cell R'-10
Cell N-4	Cell O-18	Cell Q-17	Cell R'-11
Cell N-5	Cell P-1	Cell R-5	Cell R'-12
Cell N-6	Cell P-2	Cell R-6	Cell R'-13
Cell N-7	Cell P-3	Cell R-9	Cell R'-14

Mr. Young  
April 17, 1998  
Page 2

Cell R'-15	Cell S-15	Cell V-1	Cell Y-3
Cell R'-16	Cell T-1	Cell V-2	Cell Y-4
Cell S-1	Cell T-2	Cell V-3	Cell Z-1
Cell S-2	Cell T-4	Cell V-4	Cell Z-2
Cell S-3	Cell T-5	Cell V-5	Cell Z-3
Cell S-4	Cell T-6	Cell W-1	Cell Z-4
Cell S-5	Cell T-7	Cell W-2	Cell AA-1
Cell S-6	Cell T-8	Cell W-3	Cell AA-2
Cell S-7	Cell U-1	Cell W-4	Cell AA-3
Cell S-8	Cell U-2	Cell W-5	Cell AA-4
Cell S-9	Cell U-3	Cell X-1	Cell BB-1
Cell S-10	Cell U-4	Cell X-2	Cell BB-2
Cell S-11	Cell U-5	Cell X-3	Cell BB-3
Cell S-12	Cell U-6	Cell X-4	
Cell S-13	Cell U-7	Cell Y-1	
Cell S-14	Cell U-8	Cell Y-2	

**Landfarm #2 Unit 4**

U4 Cell A-1	U4 Cell C-3	U4 Cell E-3	U4 Cell I-1
U4 Cell A-2	U4 Cell C-4	U4 Cell E-4	U4 Cell I-2
U4 Cell A-3	U4 Cell C-5	U4 Cell E-5	U4 Cell I-5
U4 Cell A-4	U4 Cell C-6	U4 Cell E-9	U4 Cell I-6
U4 Cell A-7	U4 Cell C-7	U4 Cell F-1	U4 Cell I-7
U4 Cell A-8	U4 Cell C-8	U4 Cell F-2	U4 Cell J-2
U4 Cell A-10	U4 Cell C-9	U4 Cell F-5	U4 Cell J-3
U4 Cell B-1	U4 Cell C-10	U4 Cell F-8	U4 Cell J-4
U4 Cell B-2	U4 Cell C-11	U4 Cell F-9	U4 Cell J-5
U4 Cell B-3	U4 Cell C-12	U4 Cell G-1	U4 Cell J-6
U4 Cell B-4	U4 Cell D-1	U4 Cell G-2	U4 Cell K-4
U4 Cell B-5	U4 Cell D-2	U4 Cell G-3	U4 Cell K-5
U4 Cell B-6	U4 Cell D-3	U4 Cell G-5	U4 Cell L-1
U4 Cell B-7	U4 Cell D-4	U4 Cell G-7	U4 Cell L-2
U4 Cell B-8	U4 Cell D-5	U4 Cell G-8	U4 Cell L-3
U4 Cell B-9	U4 Cell D-7	U4 Cell H-1	U4 Cell L-4
U4 Cell B-10	U4 Cell D-8	U4 Cell H-2	U4 Cell M-1
U4 Cell B-11	U4 Cell D-9	U4 Cell H-4	U4 Cell M-2
U4 Cell B-12	U4 Cell D-10	U4 Cell H-5	U4 Cell N-1
U4 Cell C-1	U4 Cell E-1	U4 Cell H-6	
U4 Cell C-2	U4 Cell E-2	U4 Cell H-7	


Mr. Young  
April 17, 1998  
Page 3

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.

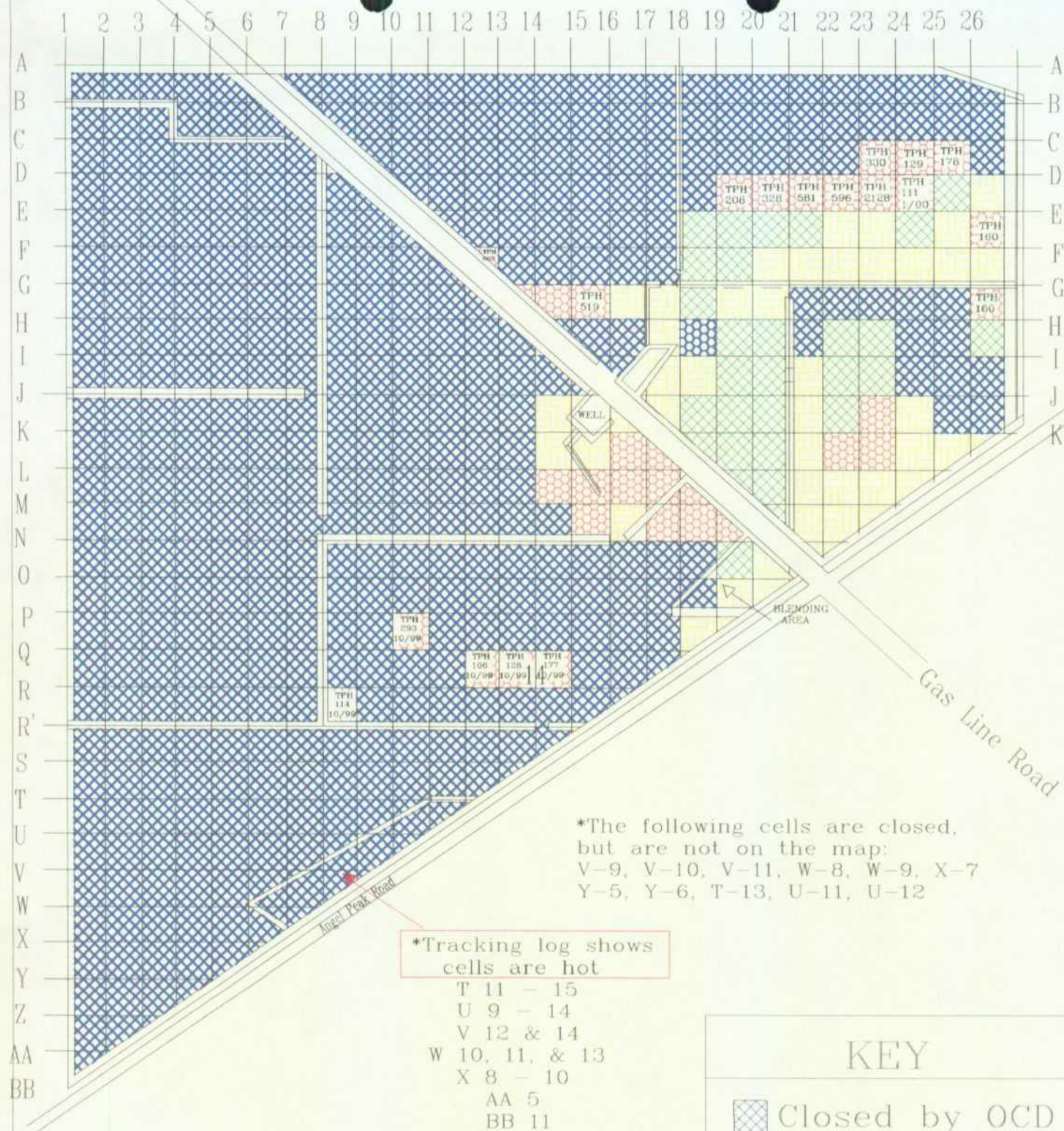
Please be advised that OCD approval does not relieve Envirotech of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, OCD approval does not relieve Envirotech of the responsibility for compliance with other federal, state and/or local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

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

Sincerely,

  
Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office



\*The following cells are closed, but are not on the map:  
 V-9, V-10, V-11, W-8, W-9, X-7  
 Y-5, Y-6, T-13, U-11, U-12

\*Tracking log shows cells are hot

T 11 - 15  
 U 9 - 14  
 V 12 & 14  
 W 10, 11, & 13  
 X 8 - 10  
 AA 5  
 BB 11

## KEY

- Closed by OCD
- Closed by Env.
- Open (Hot)
- Empty

ENVIROTECH INC.  
 LANDFARM #2

Drawn By: HMB  
 Revised: 2-16-00



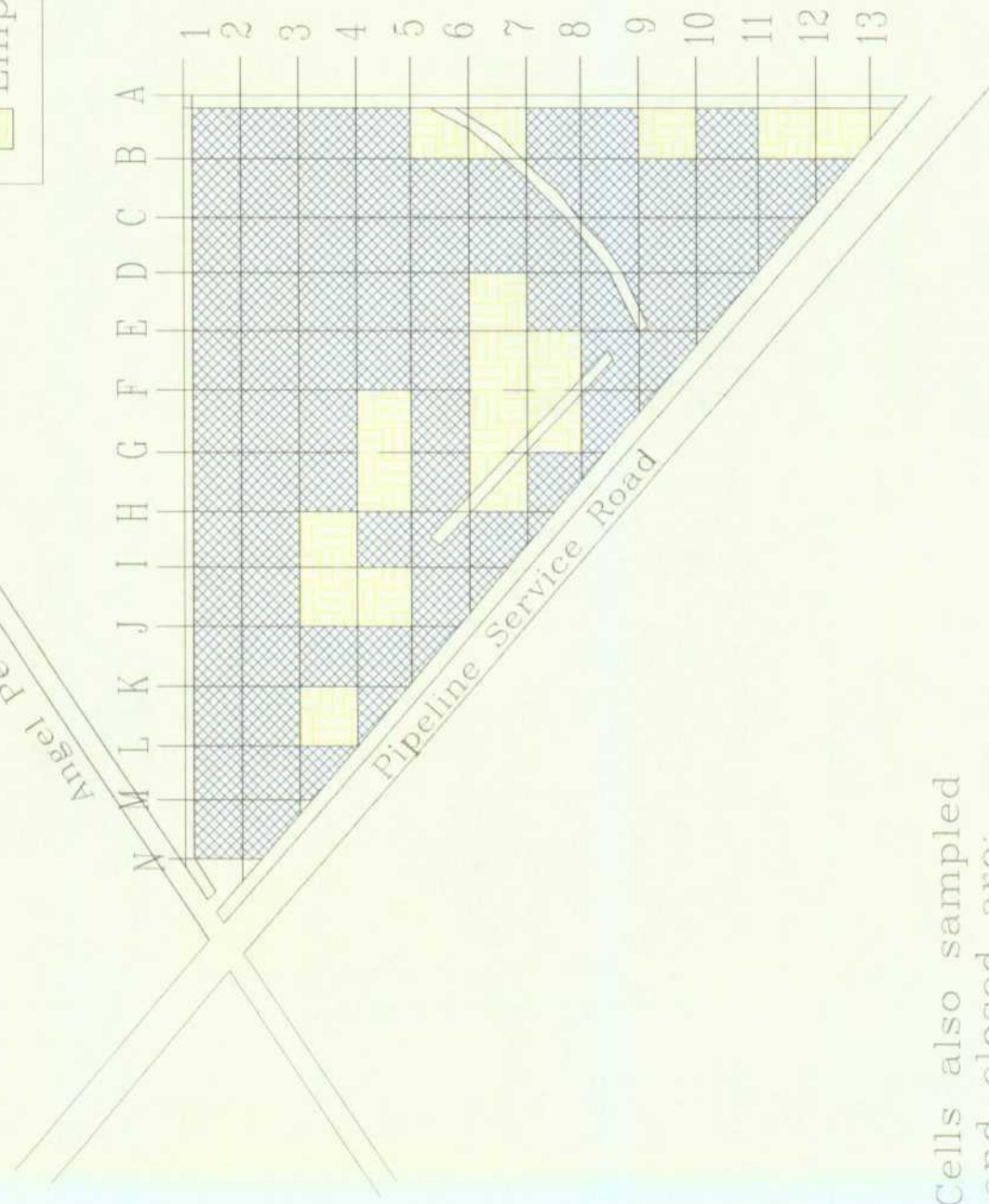


# ENVIROTECH INC.

## LANDFARM #2

### UNIT #4

KEY	
	Closed by OCD
	Closed by Env.
	Open (Hot)
	Empty

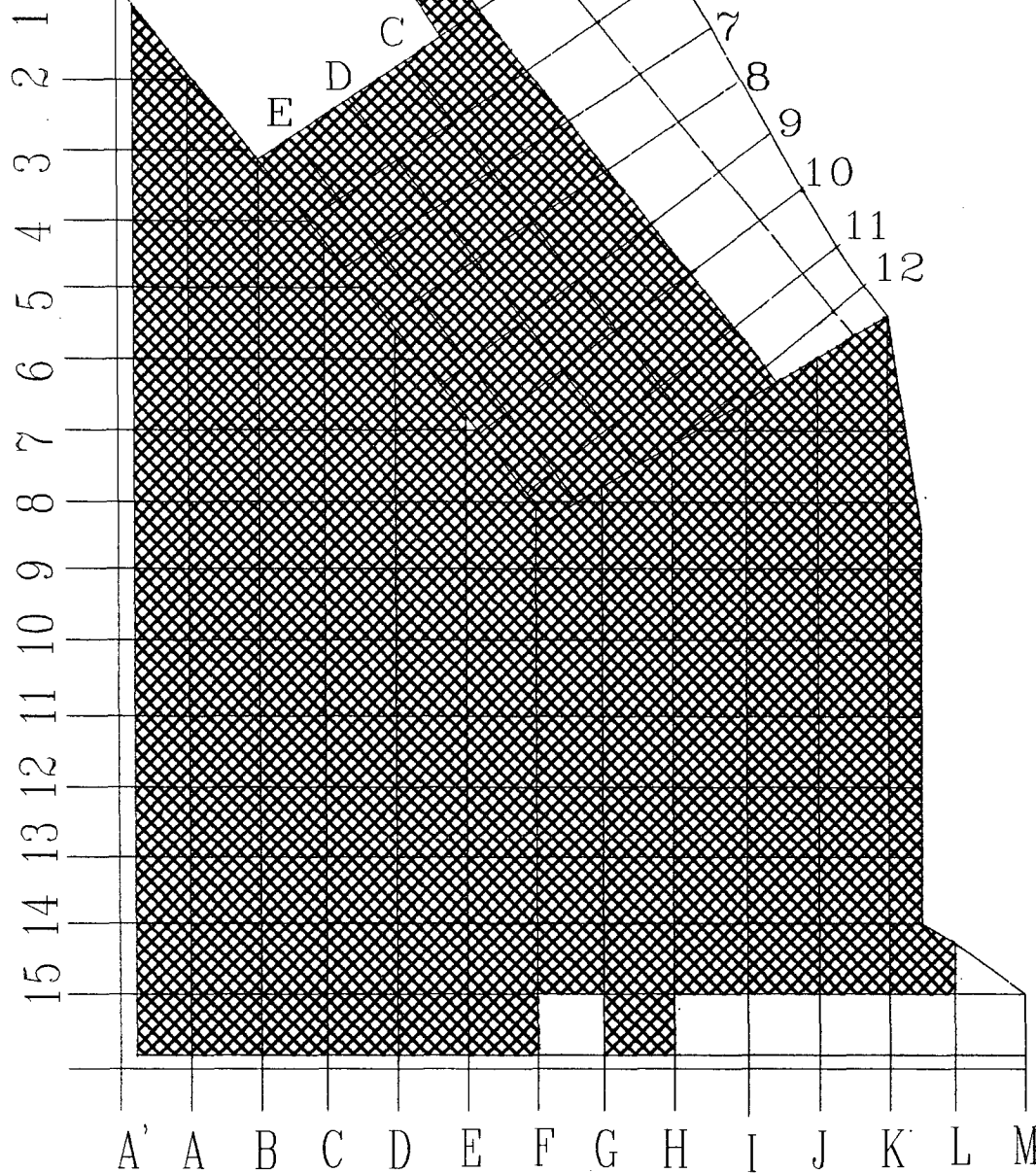


\* Cells also sampled and closed are: C12, I7, J6, K5, L4

Drawn By: HMB  
Revised: 5/99








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

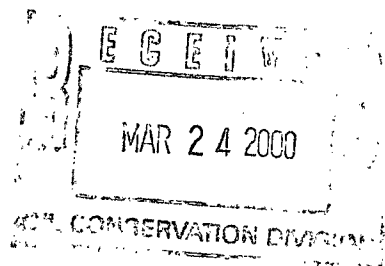
RECEIVED

MAR 24 2000

Environmental Bureau  
Oil Conservation Division

March 10, 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 # 2, Hilltop, New Mexico.  
Cells:

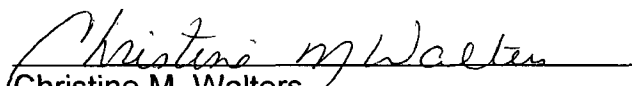
C-23, C-24 and C-25

D-19, D-20, D-21, D-22 and D-23

G -14 and G-26

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

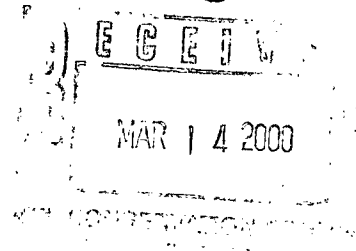
Respectfully submitted,  
**Envirotech, Inc.**

  
Christine M. Walters  
Laboratory Coordinator / Environmental Scientist

CMW/cmw

# ENVIROTECH INC.

PRactical SOLUTIONS FOR A BETTER TOMORROW



March 9, 2000

Ms. Martyne Keiling  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87501

Phone: (505) 827-7153  
Fax: (505) 827-8177

**RE: NEW LANDFARM PERMIT**

Dear Ms. Keiling:

In review of the new proposed 711 Permit for Envirotech Landfarm application, we request consideration of the following comments:

## LANDFARM OPERATION

- (5) Soils to be disked biweekly *weather permitting*
- ✓ (7) Modify to 10 feet from boundary. Permitted land is entirely surrounded by land owned personally by Morris D. Young. He does not require any buffer. Past operation has allowed placement of contaminated soil to toe of boundary berm.
- ✓ (11) Request records be kept at Envirotech office at 5796 US Highway 64 Farmington, NM.
- (14) Modify to read "Envirotech must close the original (SE) portion of unit 4 and unit 5 East of the North line and South of the 20 line all in Landfarm 2 by December 31, 2000..."

## TANK BOTTOM SLUDGE & DRILLING MUD ACCEPTANCE

- (2)(6)(8) No-flow through above ground storage tank is in operation or at the site.

## WASTE ACCEPTANCE CRITERIA

- (1)(b) Do drivers have to have a copy of all paperwork or is the present procedure of paperwork in our office prior to receiving sufficient?

## TREATMENT ZONE MONITORING

- (3) Borehole is back filled with clean native soil and compacted by foot pressure.

## REPORTING

- ✓ (4) Remove flow-through tank from the statement.
- (5) Under (6) Norms status declaration add (if applicable)

## FINANCIAL ASSURANCE

- (1) Change amount to \$22,000. As per Attachment I, water for bioremediation is not used nor has it ever been used in the 8 plus years of our Landfarm operation. When water is removed from the formula, then \$22,000 is the correct amount for financial assurance. A \$25,000 bond is currently in place.

ATTACHMENT I

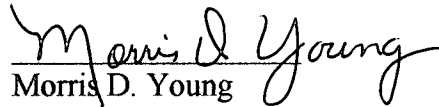
Page 2 - Water for Bid Remediation

Water for bioremediation is not used nor has it ever been used in the 8 plus years of our Landfarm operation. This item needs to be deleted from the cost estimate.

We sincerely appreciated working with you on this 711 Landfarm permit and respectfully request the modification we have noted. Please call either Morris D. Young or Harlan Brown if we can provide any additional information.

Sincerely,  
**ENVIROTECH INC.**

---

  
Morris D. Young  
President

**Public Regulation Commission****3/6/2000****ENVIROTECH, INC.****MAILING ADDRESS****5796 US HIGHWAY 64 FARMINGTON NEW MEXICO 87401**

---

**SCC Number: 1456128****Tax & Revenue Number: 02155491009****INCORPORATED ON OCTOBER27, 1989 , IN NEW MEXICO.****CORPORATION IS A DOMESTIC PROFIT****CORPORATION IS ACTIVE  
GOOD STANDING THROUGH: 3/15/2001****PURPOSE OF THE CORPORATION  
ENVIRONMENTAL CLEAN-UP****CORPORATION DATES****Taxable Year End Date: 12/31/98      Filing Date: 02/02/99  
Corporate Existence Expiration Date:****SUPPLEMENTAL POST MARK DATES****Supplemental:      Name Change:      Purpose Change:****PRINCIPAL ADDRESS****5796 US HIGHWAY 64 FARMINGTON NEW MEXICO 87401****PRINCIPAL ADDRESS(Outside New Mexico)  
N/A**

---

**REGISTERED AGENT****MORRIS YOUNG****5796 US HWY 64 FARMINGTON NEW MEXICO 87401****Designation date: 02/02/99      Agent Post Mark Date:      Resignation date:****COOP LICENSE INFORMATION****Number:      Type:      Expiration Year:****YOUNG, MORRIS D *President*  
NONE LISTED *Vice President***

**YOUNG, ROBERT M** *Secretary*  
**NONE LISTED** *Treasurer*

---

***DIRECTORS***

***Date Election of Directors: 01/31/00***

**YOUNG , MORRIS D**  
5796 U.S. HWY. 64 FARMINGTON , NM 87401

**New Search Inquiry Page**

# ENVIROTECH INC.

PRactical SOLUTIONS FOR A BETTER TOMORROW

RECEIVED

MAR 16 2000

Environmental Bureau  
Oil Conservation Division

March 3, 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 # 2, Hilltop, New Mexico.

Cells:

D-25

E-18, E-19, E-20, E-21 AND E-24

F-18 AND F-19

G-18

H-19, H-20, H-22, H-23 AND H-26

I-19, I-20, I-22 AND I-23

J-18, J-19, J-20 AND J-22

K-18, K-19 AND K-20

L-19 AND L-20

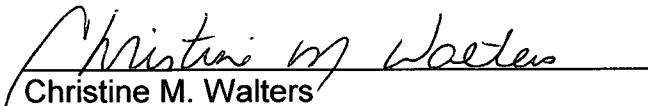
M-20

N-19



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

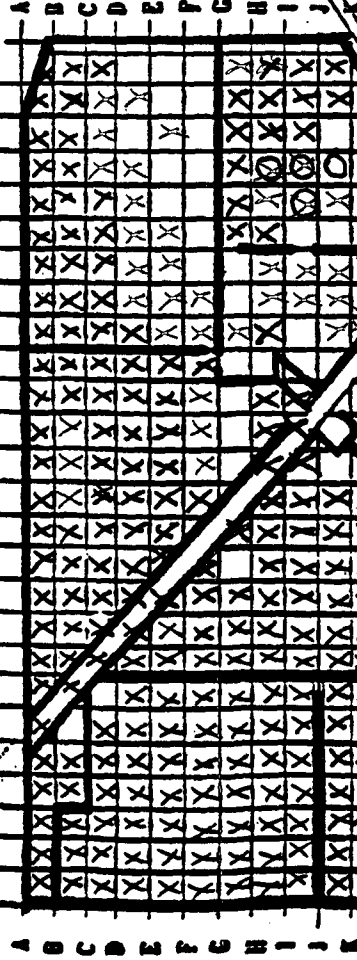
Respectfully submitted,  
**Envirotech, Inc.**

  
Christine M. Walters  
Laboratory Coordinator / Environmental Scientist

CMW/cmw

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998

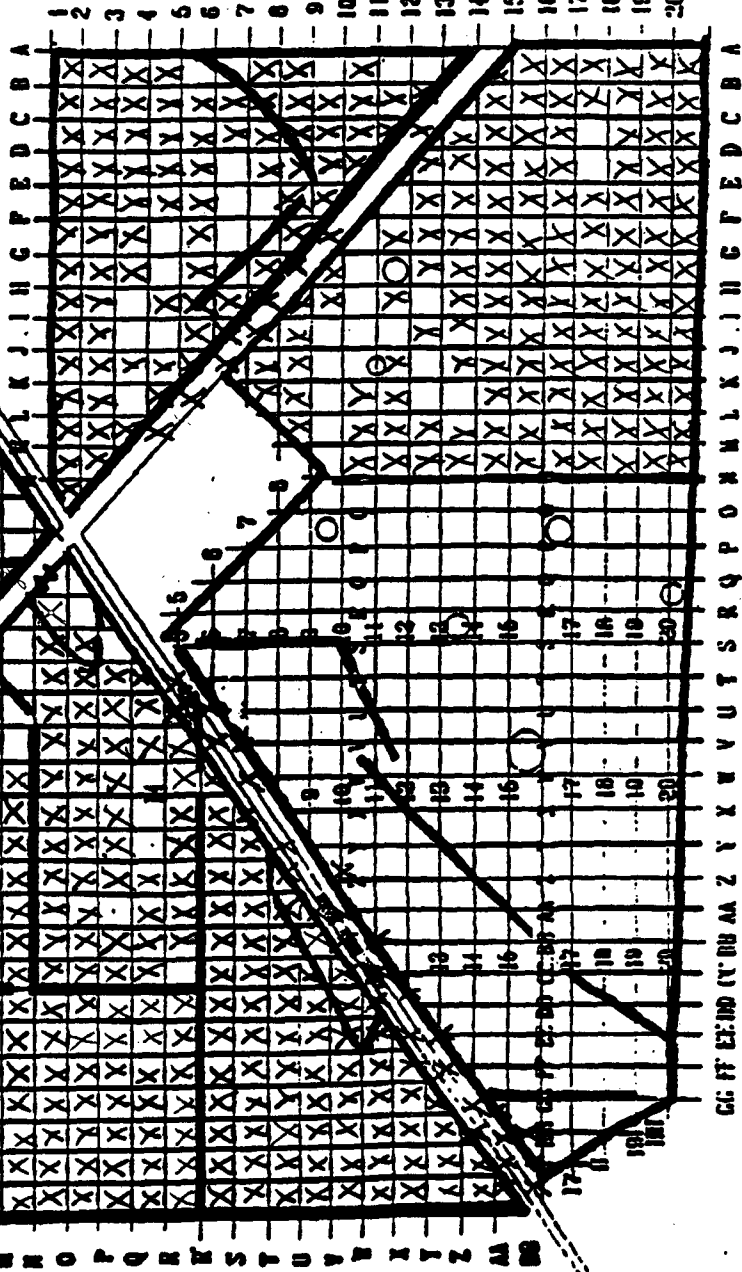
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17
- X Approved 2000 April 4

Unit #4

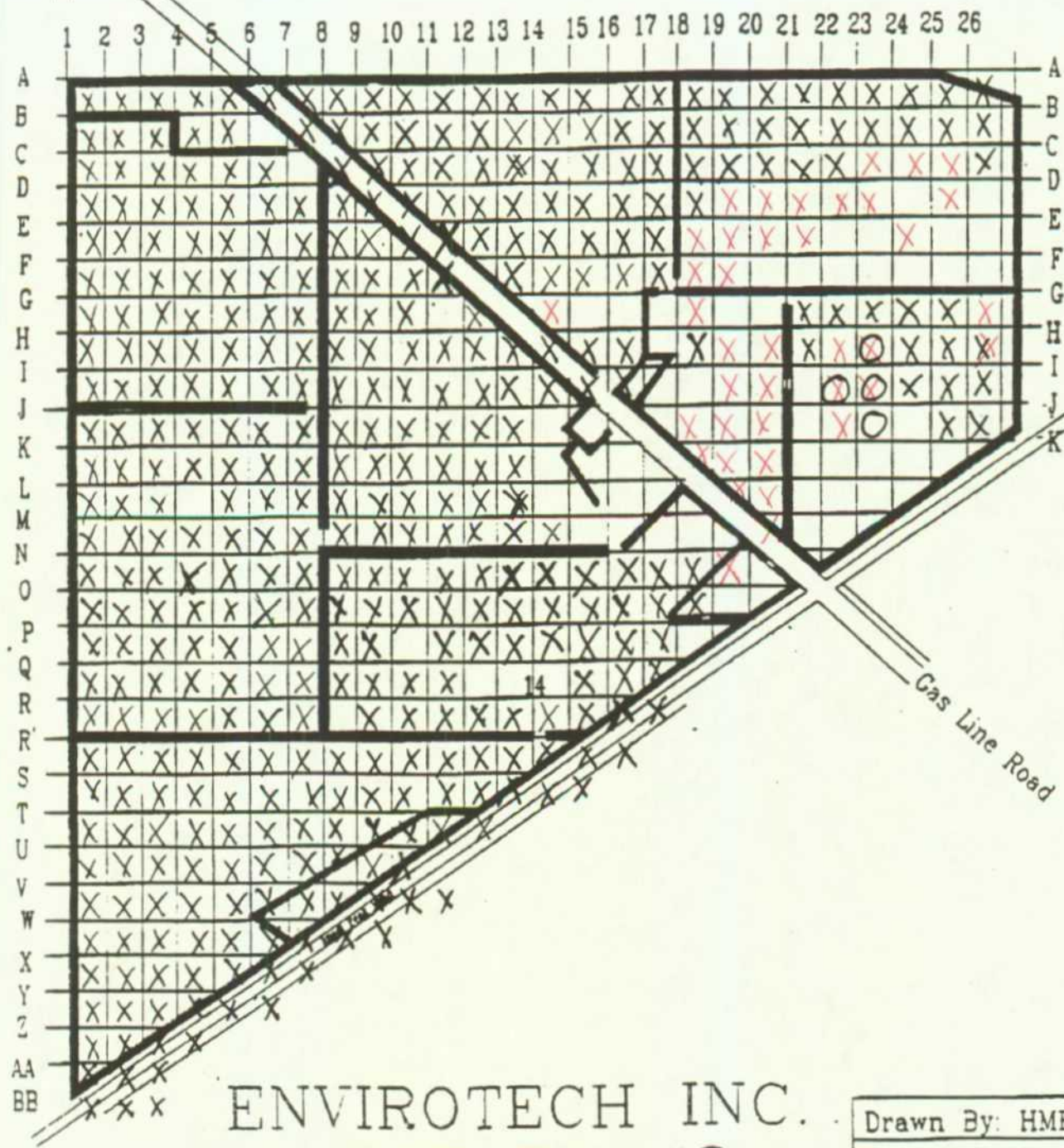
Unit #5



GC FF EE DD TT UU AA ZZ YY XX VV TT SS RR PP OO NN LL KK JJ II GG FF EE DD CC BA

X Approved 1996 February 7, June 3  
X Approved 1997 April  
X Approved 1996 April 17  
X Approved 1999 NOVEMBER 18  
X Approved 2000 JANUARY 13  
X Approved 2000 February 17

X Approved 2000, April 4



ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB

Revised: 3-16-98



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

February 17, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-274**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 dated January 19, 2000 requesting discontinued maintenance status. Based on the information provided the following Main (NE) Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Main (NE) Cells

Cell B-13	Cell F-14	Cell O-6	Cell R-1	Cell R-14
Cell B-14	Cell F-15	Cell P-6	Cell R-2	Cell T-3
Cell B-15	Cell F-16	Cell P-7	Cell R-3	Cell T-11
Cell C-13	Cell G-12	Cell Q-6	Cell R-4	Cell T-12
Cell E-9	Cell M-14	Cell Q-7	Cell R-7	Cell U-9
				Cell U-10

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.

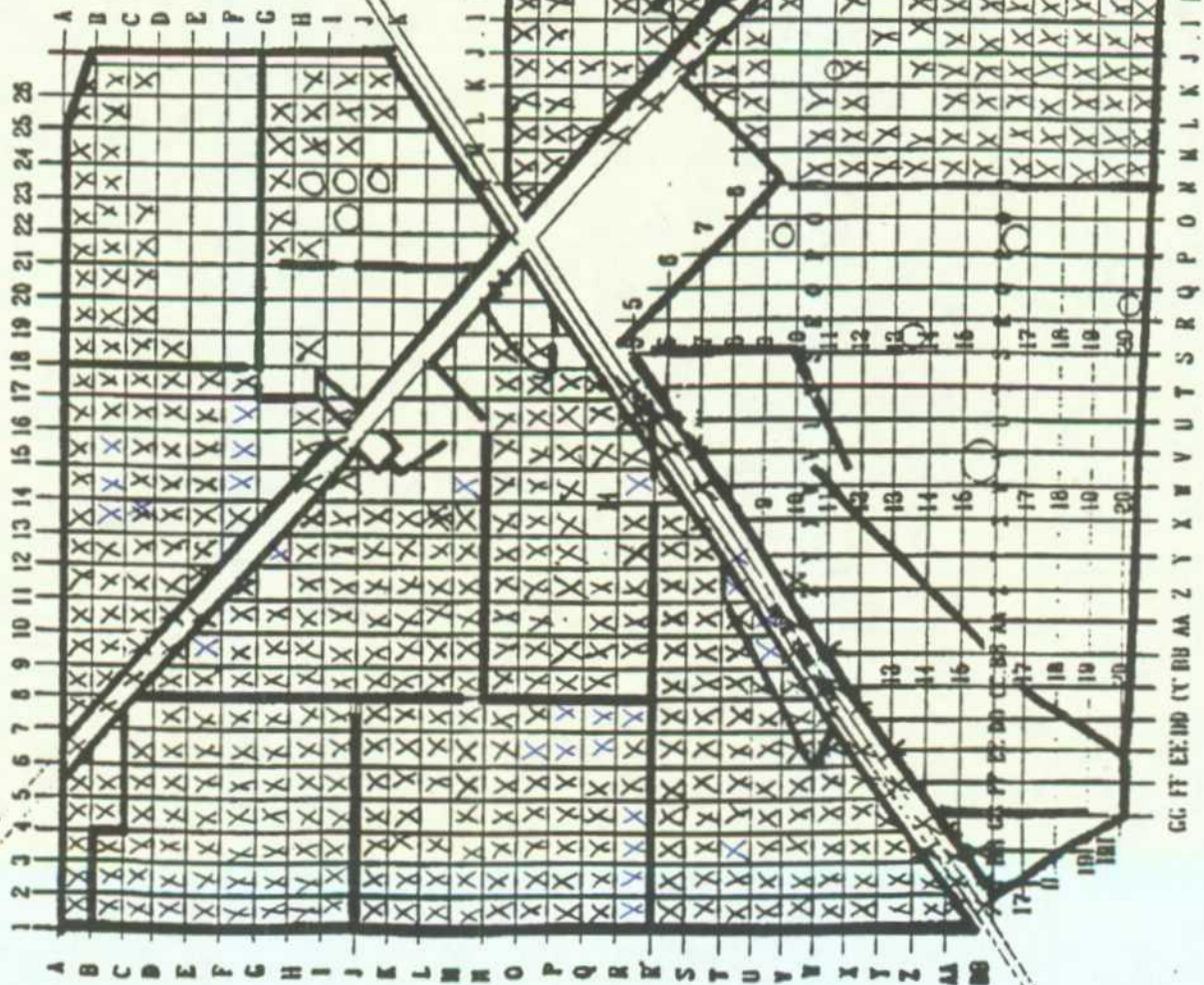
Sincerely,

Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998



- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18
- X Approved 2000 January 13
- X Approved 2000 February 17

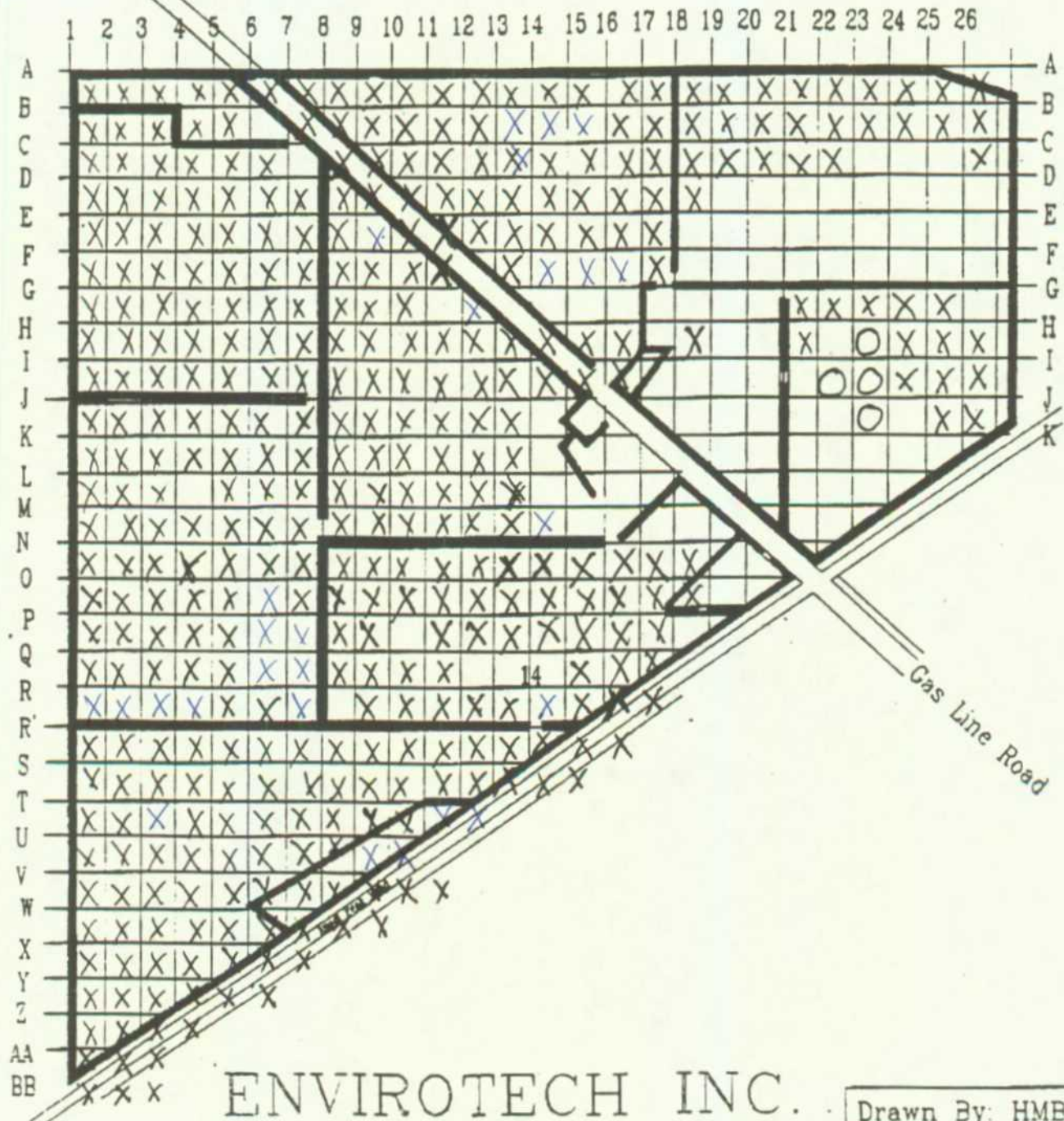
Unit #4

Unit #5

GG FF EE DD CC BB AA Z Y X W V U T S R Q P O N M L K J I H G F E D C B A



X Approved 1996 February 7, June 3  
X Approved 1997 April  
X Approved 1996 April 17  
X Approved 1999 NOVEMBER 18  
X Approved 2000 JANUARY 13  
X Approved 2000 February 17



Drawn By: HMB

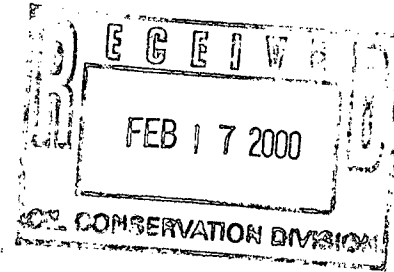
Revised: 3-16-98

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

January 19, 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 # 2, Hilltop, New Mexico.

Cells:

B-13, B-14 AND B-15

C-13

E-09

F-14, F-15 AND F-16

G-12

M-14

O-06

P-06, P-07

Q-06, Q-07

R-01, R-02, R-03, R-04, R-07 AND R-14

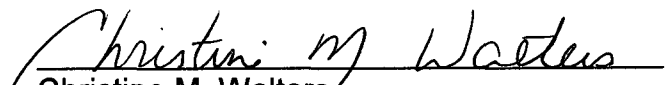
T-03, T-11 AND T-12

U-09 AND U-10



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

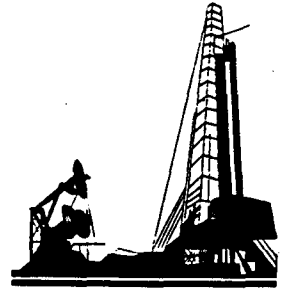
Respectfully submitted,  
**Envirotech, Inc.**

  
Christine M. Walters  
Laboratory Coordinator / Environmental Scientist

CMW/cmw

## OIL CONSERVATION DIVISION

2040 South Pacheco  
Santa Fe, NM 87505  
(505) 827-7133  
Fax: (505) 827-8177



(PLEASE DELIVER THIS FAX)

To: Morris Young (505) 823-1865

From: Martyne Kieling 827-7153 ph.

Date: 1-14-00

Number of Pages (Includes Cover Sheet) Page 1 of 10

Message: Please Review and let me know if there

is anything in your Current Land Farm operations that are

Not Consistent with this New Permit (Draft version.)

This permit will go to Lori For Approval Next

week. Thank You Martyne

If you have any trouble receiving this, please call:  
(505) 827-7133



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

January 13, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-259**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 dated November 17, 1999 requesting discontinued maintenance status. Based on the information provided the following Main (NE) Cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Main (NE) Cells

Cell N-13	Cell O--9	Cell O-14	Cell P-12	Cell Q-15
Cell N-14	Cell O-10	Cell O-15	Cell P-13	Cell R-12
Cell N-15	Cell O-11	Cell O-16	Cell P-14	Cell R-15
Cell N-16	Cell O-12	Cell P-9	Cell P-15	Cell R-16
Cell O-8	Cell O-13	Cell P-11	Cell P-16	Cell R-17

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

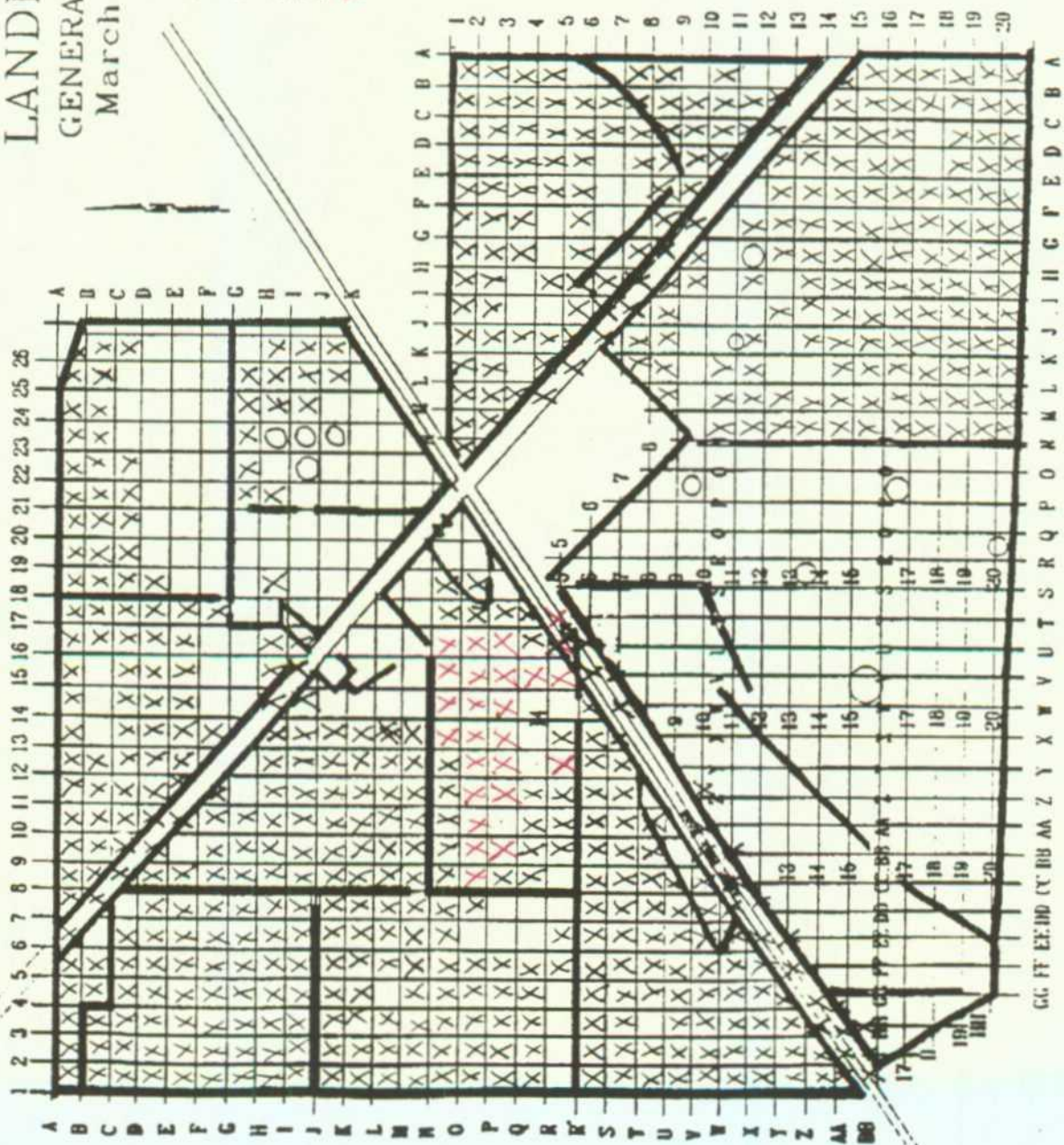
xc: OCD Aztec Office

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998

X Approved 1996 February 7, June 3  
X Approved 1997 April 1  
X Approved 1998 April 17  
X Approved 1999 November 18  
X Approved 2000 January 13

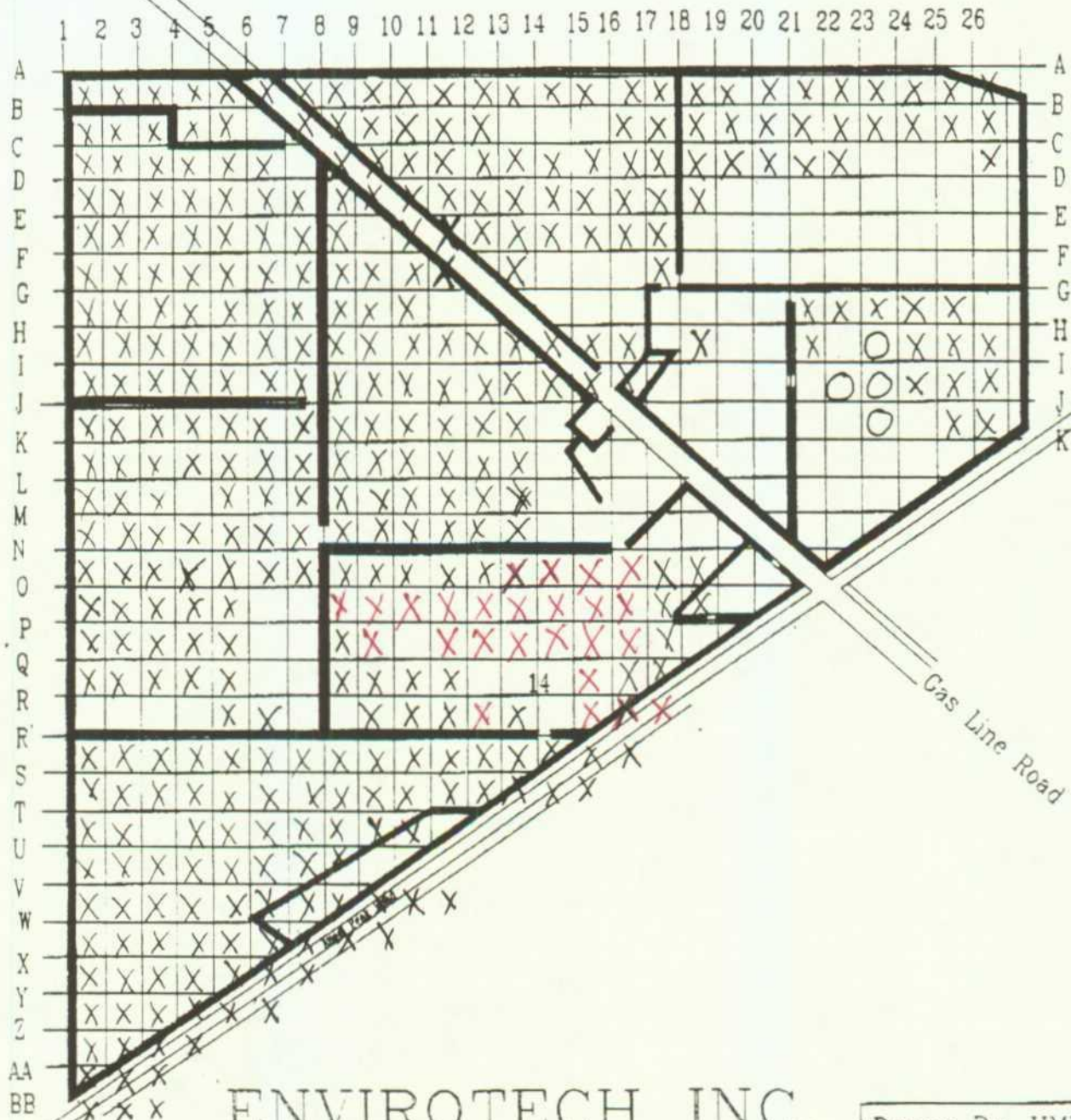
Unit #4

Unit #5





X Approved 1996 February 7, June 3  
X Approved 1997 April  
X Approved 1998 April 17  
X Approved 1999 NOVEMBER 18  
X Approved 2000 JANUARY 13



Drawn By: HMB

Revised: 3-16-98

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

December 1, 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 # 2 Unit 5, Hilltop, New Mexico. The following cells are being resubmitted for approval due to missing / incomplete data received.

Cells:

I-9, J-9, K-9, L-9 and M-9

F-10, G-10, H-10, I-10 and J-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.

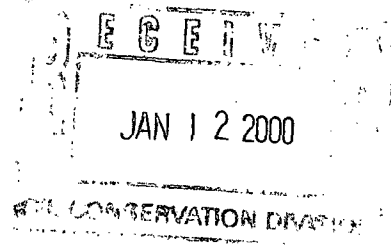
  
Christine M. Walters

Laboratory Coordinator / Environmental Scientist

CMW/cmw

# 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 # 2 Unit 5, Hilltop, New Mexico.

Cells:

A-14, A-15, A-16, A-17, A-18, A-19 and A-20

B-14, B-15, B-16, B-17, B-18, B-19 and B-20

C-13, C-14, C-15, C-16, C-18, C-19 and C-20

D-12, D-13, D-14, D-15, D-16, D-18, D-19 and D-20

E-12, E-13, E-14, E-15, E-16, E-17, E-18 and E-20

F-11, F-12, F-13, F-14, F-15, F-16, F-17, F-18, F-19 and F-20

G-9, G-12, G-13, G-14, G-15, G-16, G-17, G-18, G-19 and G-20

H-8, H-9, H-11, H-13, H-14, H-15, H-16, H-17, H-18, H-19 and H-20

I-7, I-8, I-12, I-13, I-14, I-15, I-16, I-17, I-18, I-19 and I-20

J-7, J-8, J-11, J-13, J-14, J-15, J-16, J-17, J-18, J-19 and J-20

K-7, K-8, K-10, K-11, K-14, K-15, K-16, K-17, K-18, K-19 and K-20

L-8, L-10, L-11, L-12, L-13, L-14, L-15, L-16, L-17, L-18, L-19 and L-20

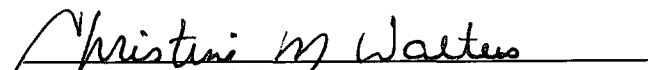
M-10, M-11, M-12, M-13, M-14, M-15, M-16, M-17, M-18, M-19 and M-20



The approval sheets, dated 6/04/99, 6/07/99, 8/11/99, 8/23/99 8/25/99 and 9/07/99, 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.

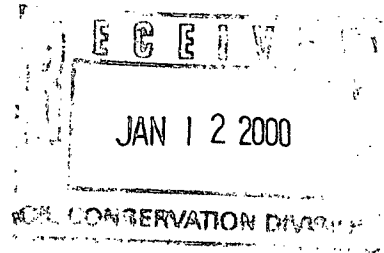
Respectfully submitted,  
**Envirotech, Inc.**

  
Christine M. Walters  
Laboratory Coordinator / Environmental Scientist

CMW/cmw

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



November 29, 1999

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

Dear Mr. Foust

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 # 2 Unit 4, Hilltop, New Mexico.

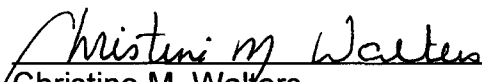
Cells:

E-8, F-3, K-1, K-2, and J-1

The approval sheets, dated 6/02/99, 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.

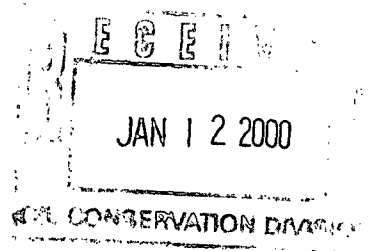
Respectfully submitted,  
**Envirotech, Inc.**

  
Christine M. Walters  
Laboratory Coordinator / Environmental Scientist

CMW/cmw

# 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 # 2, Hilltop, New Mexico.

Cells:

H-18

T-9 and T-10

V-6, V-7, V-8, V-9, V-10 and V-11

W-6, W-7, W-8 and W-9

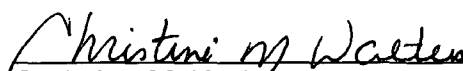
X-5, X-6 and X-7

Y-5 and Y-6

The approval sheets, dated 6/4/99, 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



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-326-936-666**

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 #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 Main (NE), Unit 5 and Unit 4 cells of Landfarm # 2 are hereby **approved** for discontinued maintenance status:

Landfarm #2 Main (NE) Cells

Cell H-18	Cell V-8	Cell W-6	Cell X-5
Cell T-9	Cell V-9	Cell W-7	Cell X-6
Cell T-10	Cell V-10	Cell W-8	Cell X-7
Cell V-6	Cell V-11	Cell W-9	Cell Y-5
Cell V-7			Cell Y-6

Landfarm # 2 Unit 5

Cell A-14	Cell B-17	Cell C-20	Cell E-13
Cell A-15	Cell B-18	Cell D-12	Cell E-14
Cell A-16	Cell B-19	Cell D-13	Cell E-15
Cell A-17	Cell B-20	Cell D-14	Cell E-16
Cell A-18	Cell C-13	Cell D-15	Cell E-17
Cell A-19	Cell C-14	Cell D-16	Cell E-18
Cell A-20	Cell C-15	Cell D-18	Cell E-20
Cell B-14	Cell C-16	Cell D-19	Cell F-11
Cell B-15	Cell C-18	Cell D-20	Cell F-12
Cell B-16	Cell C-19	Cell E-12	Cell F-13

Cell F-14	Cell H-15	Cell J-15	Cell L-14
Cell F-15	Cell H-16	Cell J-16	Cell L-15
Cell F-16	Cell H-17	Cell J-17	Cell L-16
Cell F-17	Cell H-18	Cell J-18	Cell L-17
Cell F-18	Cell H-19	Cell J-19	Cell L-18
Cell F-19	Cell H-20	Cell J-20	Cell L-19
Cell F-20	Cell I-7	Cell K-7	Cell L-20
Cell G-9	Cell I-8	Cell K-8	Cell M-10
Cell G-12	Cell I-12	Cell K-10	Cell M-11
Cell G-13	Cell I-13	Cell K-11	Cell M-12
Cell G-14	Cell I-14	Cell K-14	Cell M-13
Cell G-15	Cell I-15	Cell K-15	Cell M-14
Cell G-16	Cell I-16	Cell K-16	Cell M-15
Cell G-17	Cell I-17	Cell K-17	Cell M-16
Cell G-18	Cell I-18	Cell K-18	Cell M-17
Cell G-19	Cell I-19	Cell K-19	Cell M-18
Cell G-20	Cell I-20	Cell K-20	Cell M-19
Cell H-8	Cell J-7	Cell L-8	Cell M-20
Cell H-9	Cell J-8	Cell L-10	
Cell H-11	Cell J-11	Cell L-11	
Cell H-13	Cell J-13	Cell L-12	
Cell H-14	Cell J-14	Cell L-13	

Landfarm #2 Unit 4

Cell E-8	Cell-J	Cell K-1	Cell K-2
Cell F-3			

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 cell data packets for Landfarm #2 were incomplete and could not be evaluated. The OCD is returning the incomplete data packets. Please review the enclosed data packets and resubmit when completed. Discontinued maintenance status is hereby **denied** for the following cells:

Landfarm #2 Unit 5

Cell F-10	Cell I-9	Cell J-10	Cell M-9
Cell G-10	Cell I-10	Cell K-9	
Cell H-10	Cell J-9	Cell L-9	

Mr. Young  
November 18, 1999  
Page 3

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,

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

Martyne J. Kieling  
Environmental Geologist

xc:     OCD Aztec Office

# LANDFARM 2 UNIT 5

*Class*  
*Approved/Closed*  
*11/17/99*  
*mjk*

A-14 to A-20	<u>CELL</u>
B-14 to B-20	A-16
C-14 to C-16	A-17
C-18 to C-20	A-18
D-12 to D-16	A-19
D-18 to D-20	A-20
E-12 to E-20	B-16
F-11 to F-20	B-17
G-9	B-18
G-12 to G-20	B-19
H-8 to H-9	B-20
H-11	C-16
H-13 to H-20	C-18
I-7 to I-8	C-19
I-12 to I-20	C-20
J-7 to J-8	D-16
J-11	D-18
J-13 to J-20	D-19
K-7 to K-8	D-20
K-10 to K-11	E-16
K-14 to K-20	E-17
L-8	E-18
L-10 to L-20	E-19
M-10 to M-20	E-20
	F-16
	F-17
	F-18
	F-19

*Denied Incomplete*  
*11/17/99*  
*mjk*

F-10
G-10
H-10
I-9 to I-10
J-9 to J-10
K-9
L-9
M-9

CELL

F-20
G-16
G-17
G-18
G-19
G-20
H-16
H-17
H-18
H-19
H-20
I-16
I-17
I-18
I-19
I-20
J-16
J-17
J-19
J-20
K-19
K-20
M-19
M-20
L-19
L-20



Land Farm #1

Clean Close

Approved

MJK 11/17/99

Bio Cells

B-10

C-10 to C-11

A-15

B-15

D-15

G-15

Land Farm #2

Unit #4

Approved  
Clean  
Close  
11/17/99

E-8

F-3

J-1

K-1 to K-2

Land Farm #2

NE

H-18

T-9 to T-10

V-6 to V-11

W-6 to W-9

X-5 to X-7

Y-5 to Y-6

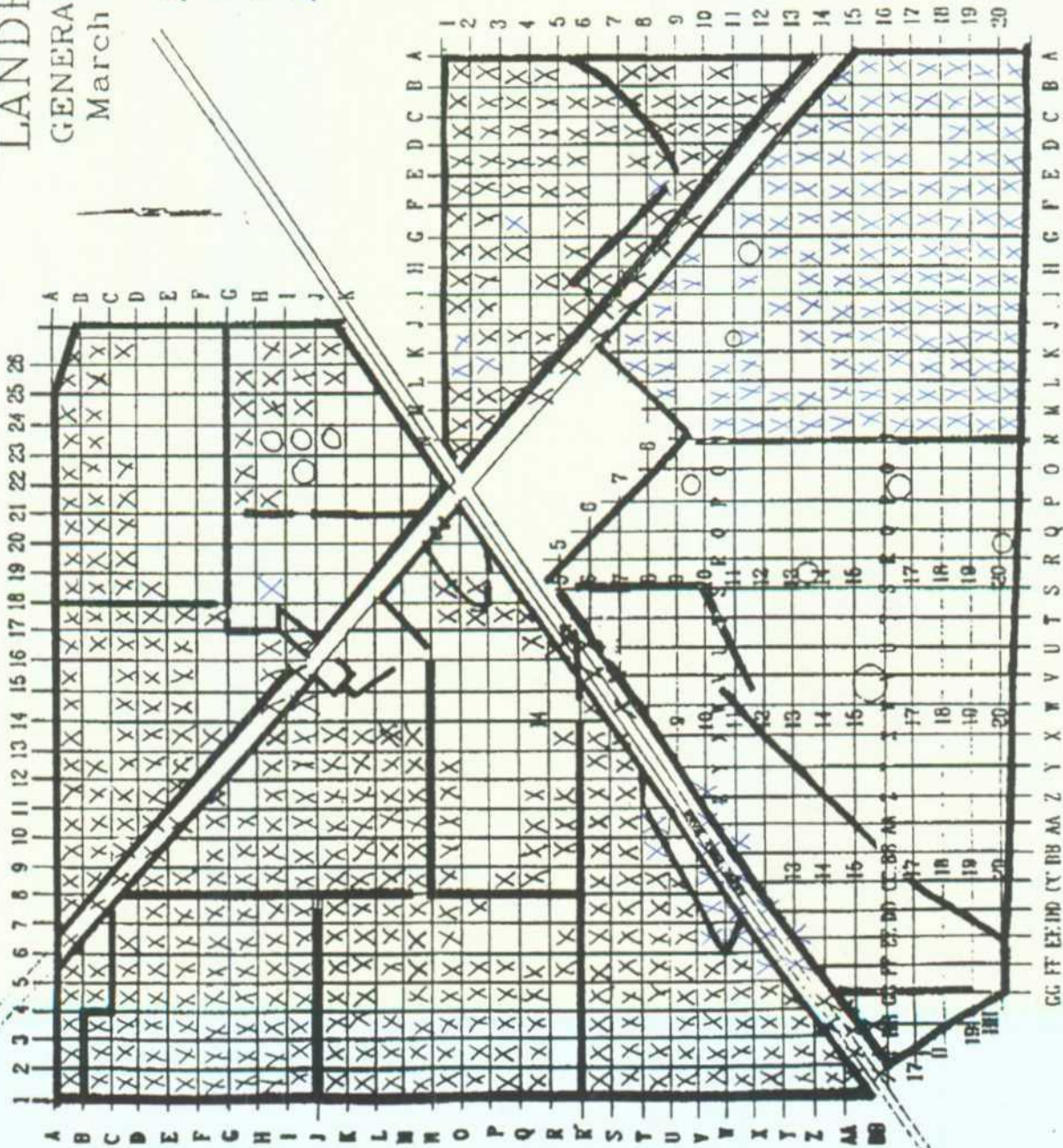
Approved  
Clean  
Close  
11/17/99

Demy - 6-9-49  
26  
125  
Here is another  
batch of Landfarm  
Cell closures for  
Envirotech. If you  
have questions call  
me. Thanks

Christine

# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998

- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 November 18



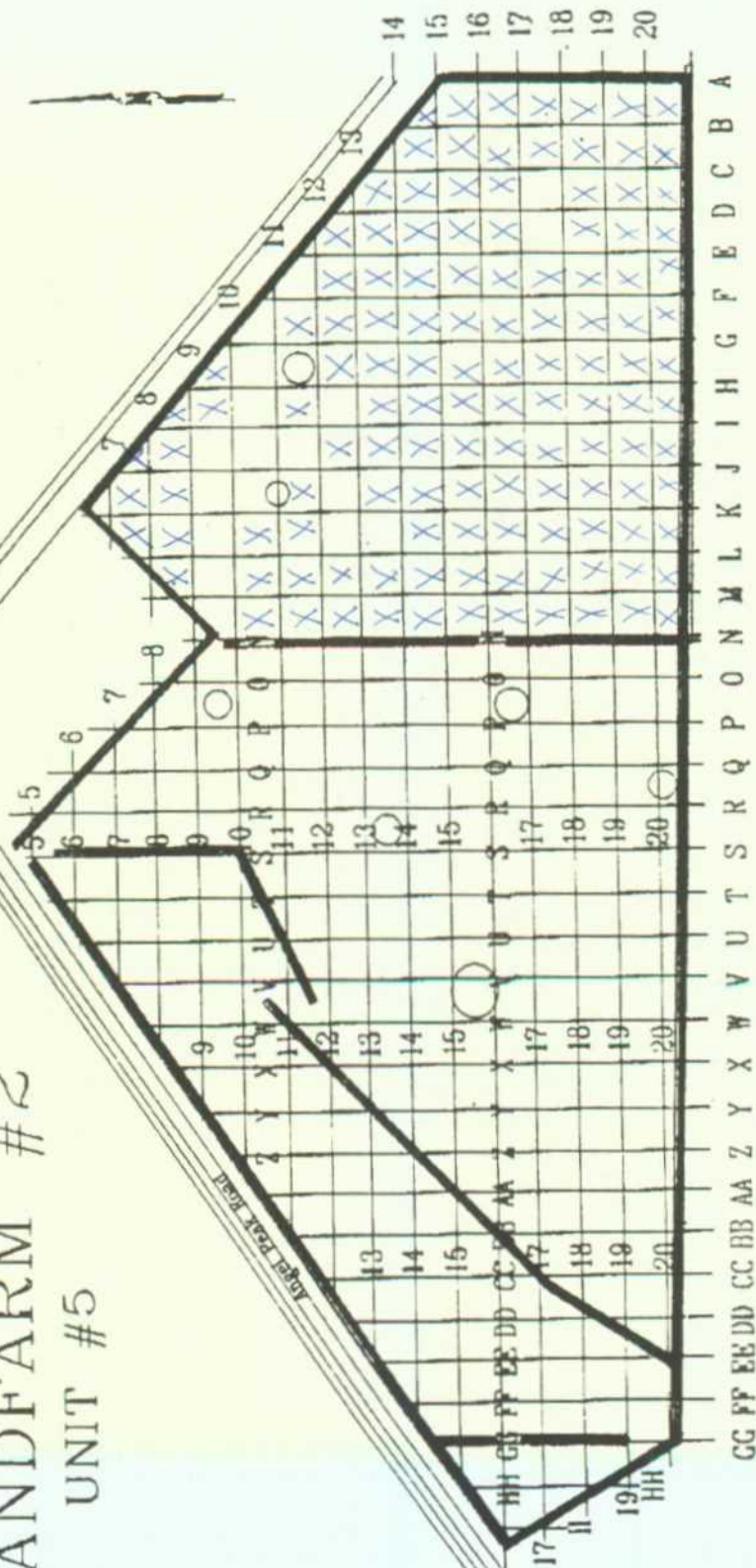
X Approved November 18, 1999

5056321865 YOUNG ENVIRONMENTAL

634 P05 APR 17 '98 10:56

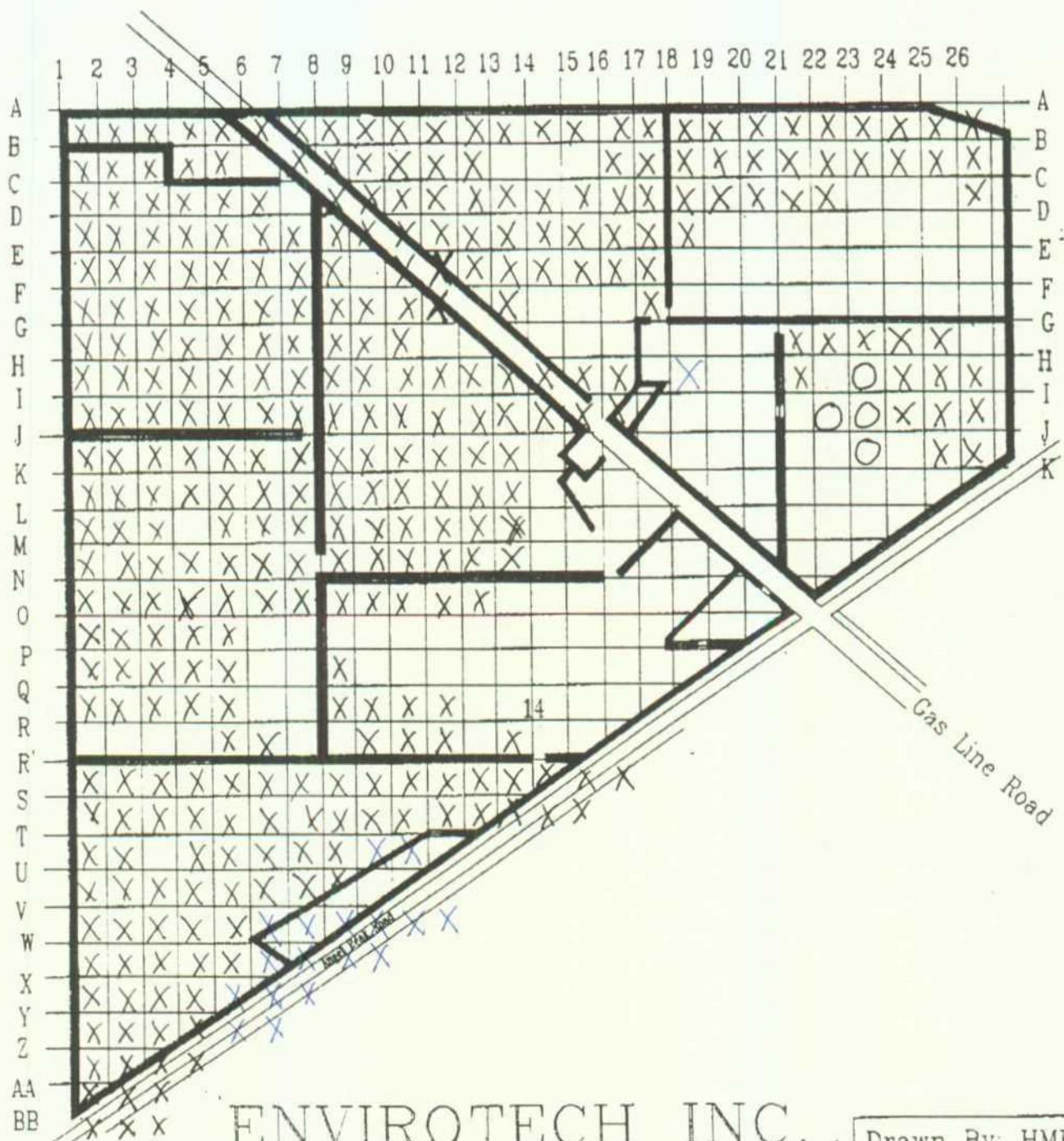
Drawn By: HMB  
Revised: 3-16-98  
C:\acad10\work\122unit5

ENVIROTECH INC.  
LANDFARM #2  
UNIT #5





X Approved 1996 February 7, June 3  
 X Approved 1997 April  
 X Approved 1998 April 17  
 X Approved 1999 November 18



ENVIROTECH INC.  
 LANDFARM #2

Drawn By: HMB
Revised: 3-16-98

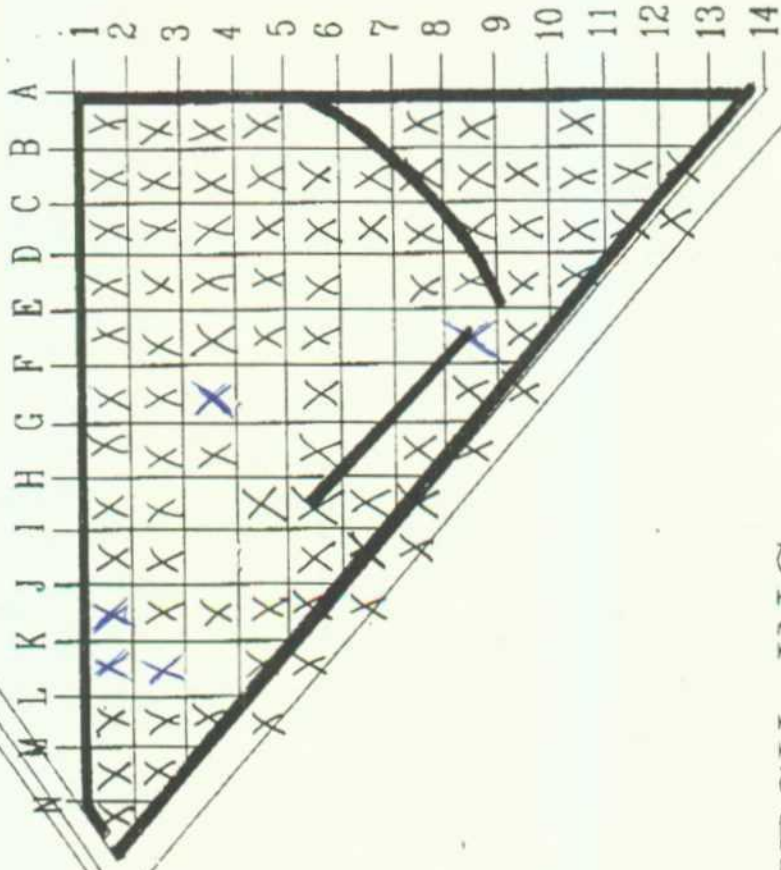
X Approved 1999 November 18

# Unit #4

Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\W2unit4

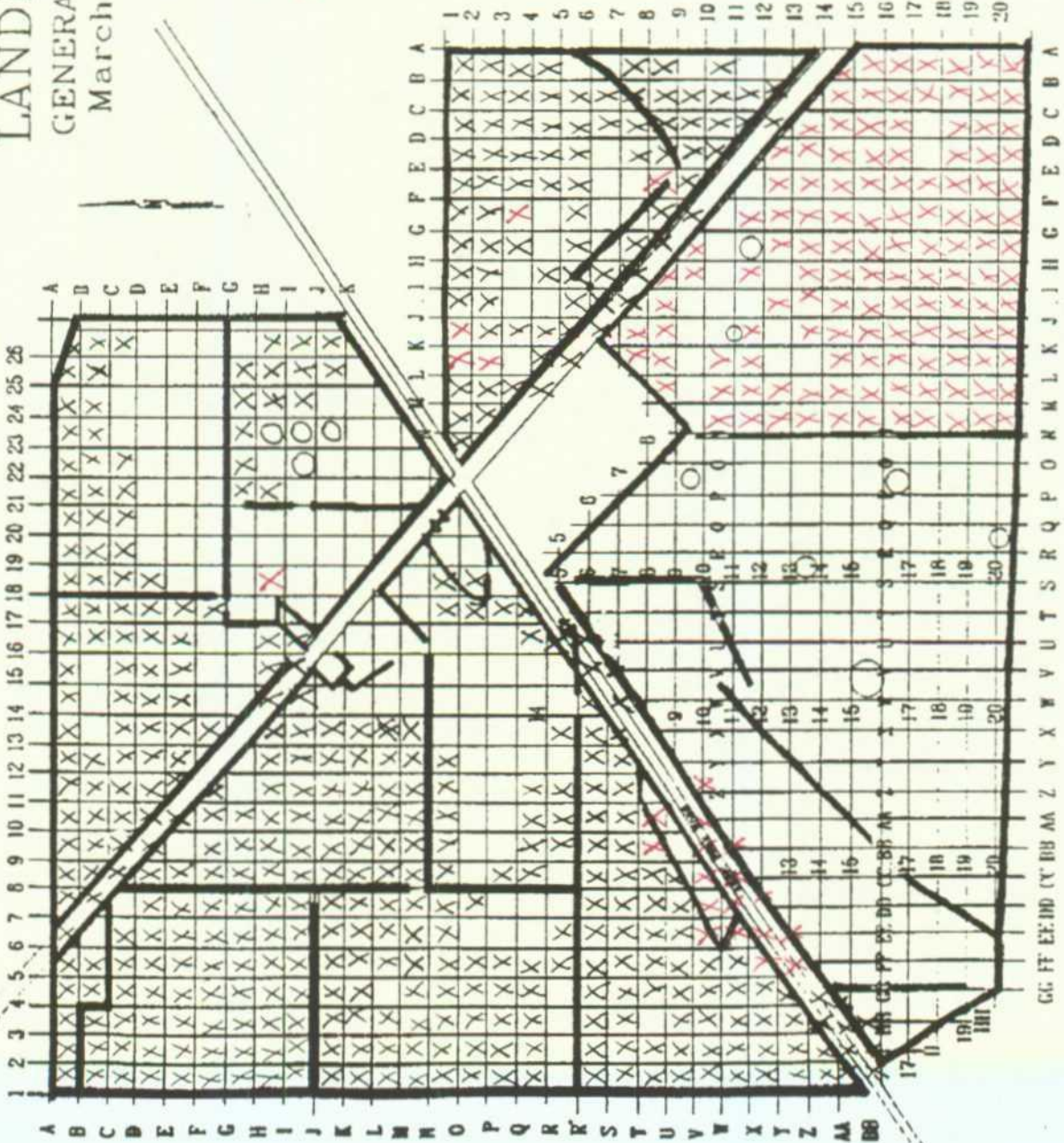


ENVIROTECH INC.  
LANDFARM #2  
UNIT #4



# ENVIROTECH INC. LANDFARM #2 GENERAL SITE MAP March 16, 1998

- X Approved 1996 February 7, June 3
- X Approved 1997 April 1
- X Approved 1998 April 17
- X Approved 1999 NOVEMBER 18



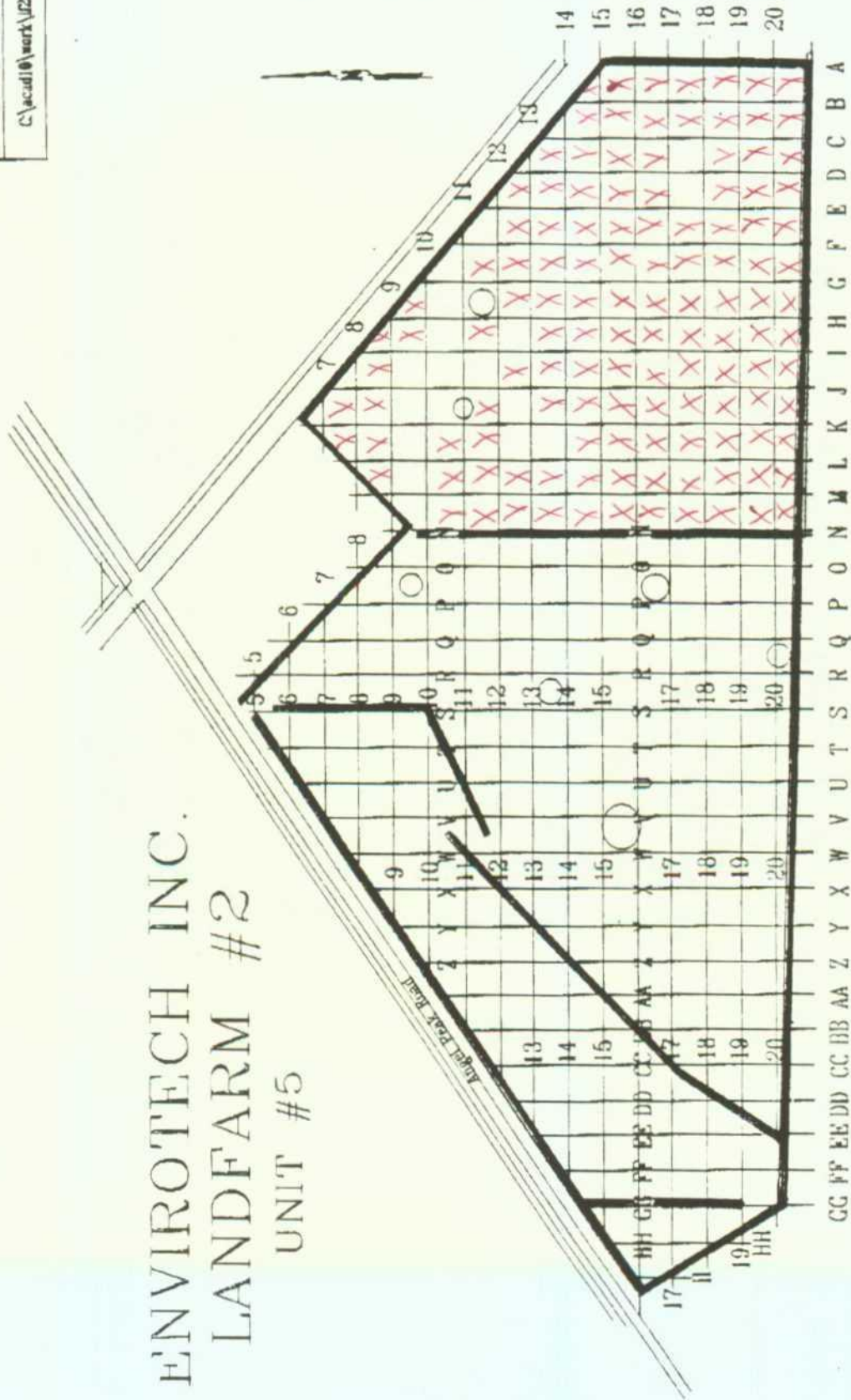
Approved 1999 NOVEMBER 18

5056321865 YOUNGENVIRONMENTAL

634 P05 APR 17 '98 10:56

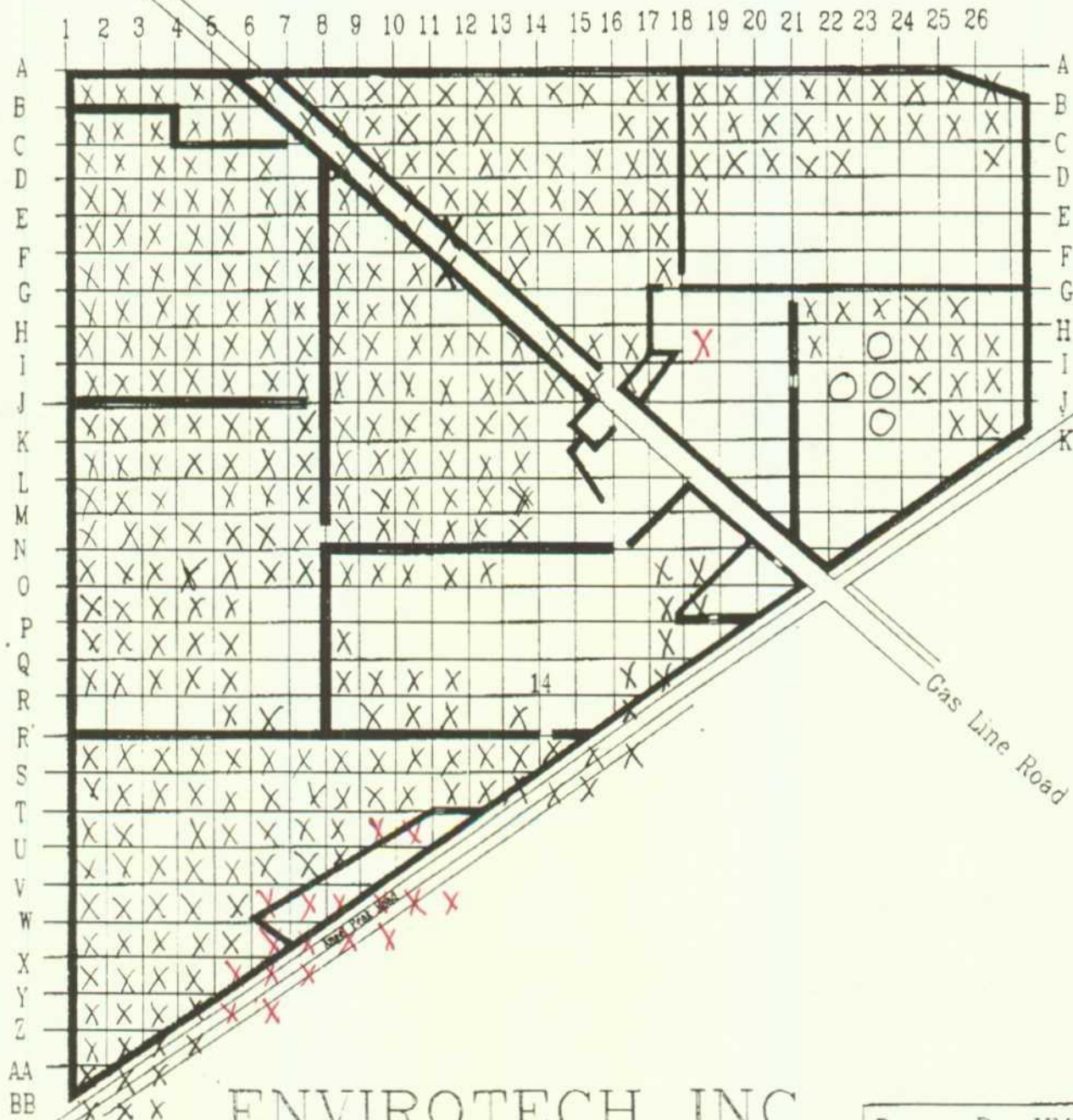
Drawn By: HMB  
Revised: 3-16-98  
C:\acut\0\work\12\unit5

ENVIROTECH INC.  
LANDFARM #2  
UNIT #5





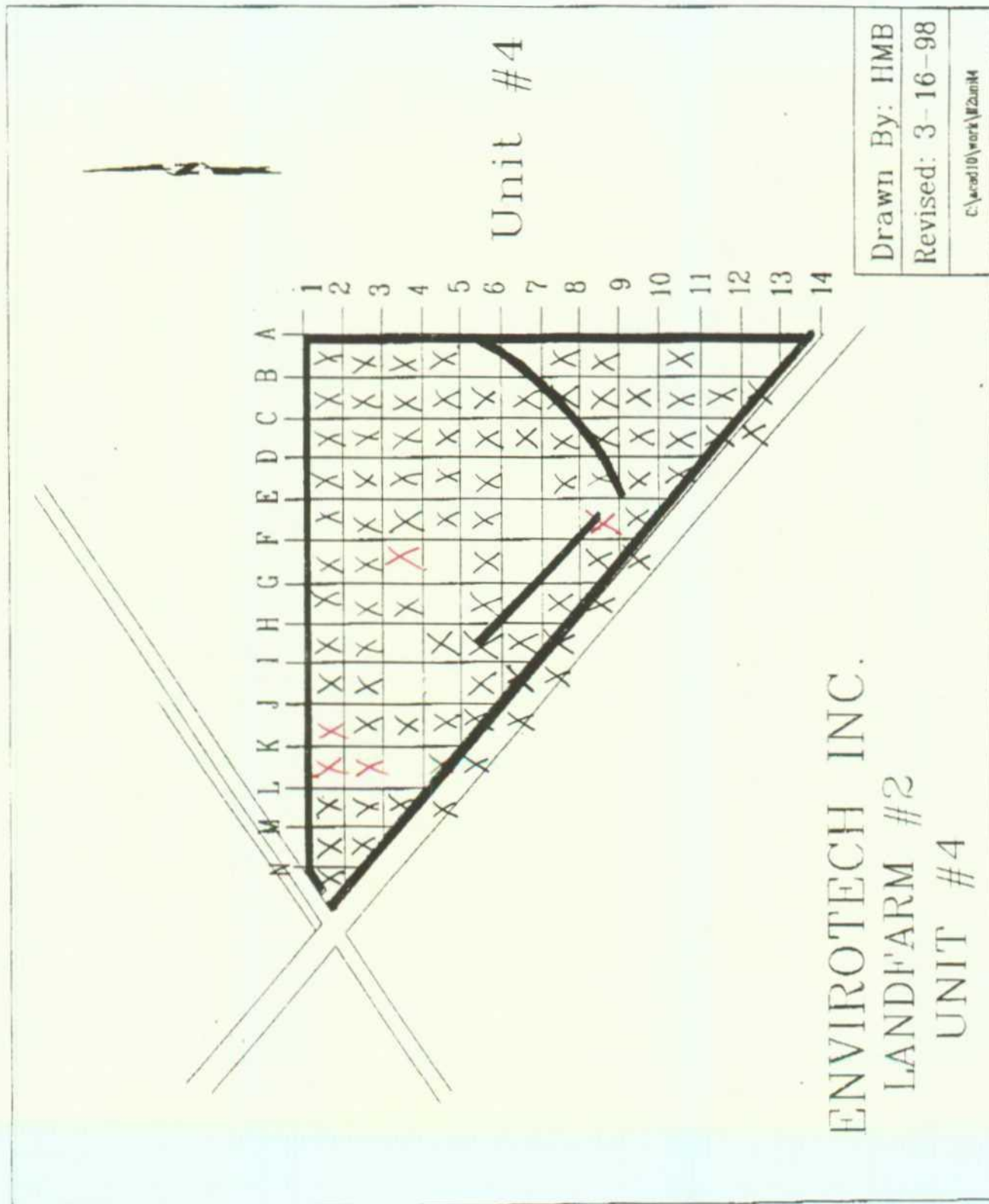
X Approved 1996 February 7, June 3  
X Approved 1997 April  
X Approved 1996 April 17  
X Approved 1999 NOVEMBER 18



ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB  
Revised: 3-16-98

X Approved 1999 NOVEMBER 19



## **Kieling, Martyne**

---

**From:** Martin, Ed  
**Sent:** Thursday, July 29, 1999 10:11 AM  
**To:** Olson, William; Kieling, Martyne  
**Cc:** Foust, Denny; Wrotenbery, Lori; Anderson, Roger  
**Subject:** Lube Oil Spill

Denny Foust called this morning to report a lube oil spill in their District.

Overturned Coastal Chemical truck.  
1200 gals. new lube oil  
Occurred about 8:00 am today.  
County Road 4599, near Southwest Water Disposal  
Clean up in process.  
State Police on scene.  
Spill to be transported to Enviro-Tech Land Farm.

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION

## MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 10:45	Date 7-29-99 <del>Denny</del>
<u>Originating Party</u>		<u>Other Parties</u>
Denny Foster		Bill Olson
<u>Subject</u> 24,000 gal New lube oil Spill on Highway    Soil & Spilled material to go to Envirotec For Storage    Emergency Action		
<u>Discussion</u> Future Questions    oil field company? or Do we need a letter from the Department of Public Safety?		
<u>Conclusions or Agreements</u>		
<u>Distribution</u>	Signed <i>Walter Kief</i>	

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Roger Anderson

RECEIVED  
JUL - 6 1999

OIL CON. DIV.  
DIST. 3

June 29, 1999

New Mexico Environment Dept.  
Hazardous and Radioactive Materials Bureau  
Attn: Michael C. Le Scouarnec  
P.O. Box 26110  
Santa Fe, New Mexico 87502

505-827-1509

Fax 505-827-1833

Re: Emergency "medical" waste clean-up, Shiprock, New Mexico

Dear Mr. Le Scouarnec:

As requested during our telephone conversation of June 28, 1999 the following is a summary of facts and information we have been able to sort out regarding the referenced incident.

- 1) Envirotech responded to the scene of a possible medical waste dump site on June 2, 1999. Materials recovered included nine cork sealed amber bottles containing an unknown white dry powder or granular material. We also recovered tyvek, rubber gloves, and polyethylene sheeting used and left by the initial responders (Farmington Haz-Mat Team). All of the subject material fit into a 30 gallon overpack for transport and disposal.
- 2) Due to the open nature of the site and probable access by pedestrians and children, Navajo Nation EPA requested that the barrel and its contents be removed from the area. Envirotech Inc. has a discharge permit from the New Mexico Energy and Minerals Department Oil Conservation Division governing our yard facility. Under this permit we do not make a practice of storing hazardous material. Under the circumstances of the subject incident we contacted our regulator for permission to hold the drum pending disposal. Envirotech Inc. also contacted John Tymkowych, NMED H&RMB, for authorization to transport and hold the material at our facility until an EPA permitted transporter and TSDF could be arranged. Verbal approval was obtained from Mr. Tymkowych, but the promised written documentation has not yet been received.
- 3) Several agencies are involved in this project including Navajo Nation Environmental Protection Agency, Navajo Historic Preservation, Bureau of Indian Affairs - Navajo Area Office, Navajo Shiprock Chapter House, and United States Environmental Protection Agency. None of the agencies want to be listed as the generator for this waste stream because they assume that to accept the charges for one barrel essentially places them in a position to be the responsible party for the

balance of a larger cleanup remaining at the site.

- 4) The origin of the subject material is unknown. There are a number of potential local sources including; 1) a former uranium mill company, 2) a former circuit board electronics company, and 3) the lab/pharmacy of the Indian Health Services. All of these entities have operated in Shiprock.
- 5) Envirotech Inc. photographed the bottles and made sketches of the glass manufacturers markings on the bottom of each bottle in order to meet a request from Navajo Historic Preservation to document the removal of potentially historic items. We also arranged for Envirosolve Southwest to pick up the bottles and cleanup materials (tyvek, plastic, and rubber gloves) for proper disposal.
- 6) The drum was shipped as Conditional Exempt Small Quantity Generator (CESQG) waste with the BIA Navajo Area Office named as the generator. This has been a huge problem for all parties involved in that no one wants to be named the generator for reasons already stated. (A related problem is that no one wants to pay for the disposal and this leaves Envirotech "holding the bag" for costs incurred to protect human health and the environment.)
- 7) Much of the information we have regarding this project has been obtained second hand and after the fact. We have learned that a labeled bottle was placed back in the excavation rather than included in the waste stream. None of the bottles shipped for disposal were labeled.

Students of a San Juan College Construction Operators Class reportedly had temporary ill effects when the bottles were originally found. Evidence in our possession and information received since the waste was transferred to Envirosolve does not support that there was any sort of a physical response from those in the vicinity of the site. There was no newly broken glass or other vessels in the disposal lot to suggest any sort of undesirable release.

Because NNEPA and the BIA-NAO cannot agree on who is responsible for the cleanup, Kaye Lawrence, USEPA Region IX, has stepped in to see if USEPA can arrange funding for the Shiprock Chapter via Local Government Reimbursement from the USEPA Superfund.

The extent of potential dumping at the site is unknown.

- 8) Based on anecdotal information, the bottles were shipped as unknown hazardous waste, potentially containing mercuric oxide. Envirosolve conducted a field "Haz-Cat" on the subject materials including tests for the presence of TPH, pH, Ignitability, and toxicity (based on halogen



meter results) by a field test kit. All tests posted negative results. We have since requested a "rad" scan to eliminate the possibility of radio nuclides.

- 9) Envirotech has recommended disposal of the waste stream as unknown hazardous materials based on the results of the haz-cat in order to minimize profiling costs. At this time it appears that the mood of the USEPA and NNEPA is to attempt an exact identification of the materials, regardless of cost, in order to properly identify a generator.

It is not our intention to force anyone into making a bad decision. However, we at Envirotech do understand the gravity of dealing with hazardous materials. We are also aware of the potential for exorbitant costs related to profiling. It is our opinion that proper characterization of the waste stream for disposal may not necessarily clearly identify the compounds needing disposal. Human health and the environment will benefit from proper disposal and this need not be at extraordinary cost.

Because the generator has been incorrectly identified on the Hazardous Waste Shipping Manifest Envirotech is tempted to return the drum and its contents to its point of origin at Shiprock. However, since this only compounds the potential legal battle that may develop between NNEPA, BIA, and USEPA - Region IX, we have opted to leave the drum, safely out of harms way, at Envirosolve's EPA permitted TSDF until the parties involved can sort out how this issue is to be resolved (or until holding time necessitates disposal).

We would appreciate your comments regarding this project. If we can be of further service or if you have questions please feel free to contact us at 505-632-0615.

Sincerely,  
Envirotech Inc.



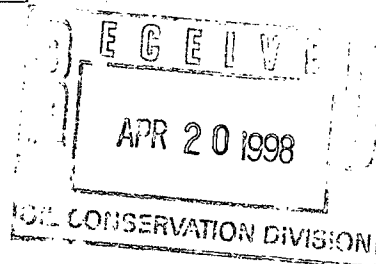
Harlan M. Brown  
Staff Geologist / Hydrogeologist  
New Mexico Certified Scientist #083

cc: Rose Duwyenie, BIA Environmental Services  
Derith Moore, Executive Director, Navajo Nation EPA  
Arlene Luther, Navajo Nation EPA  
Kaye Lawrence, USEPA Region IX  
Denny Foust, NMOCD



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



April 17, 1998

Ms. Martyne J. Kieling  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 S Pacheco Street  
Santa Fe, NM 87505

**RE: ENVIROTECH INC. LANDFARM NO. 2 EXPANSION MAPS**

Dear Ms Kieling:

Inclosed are the maps you requested for the expansion made to landfarm #2. We have included an aerial view of the entire expansion and three additional maps of each individual unit of landfarm #2 (unit 4 & 5). If you have any additional questions please call Harlan or I.

Sincerely,

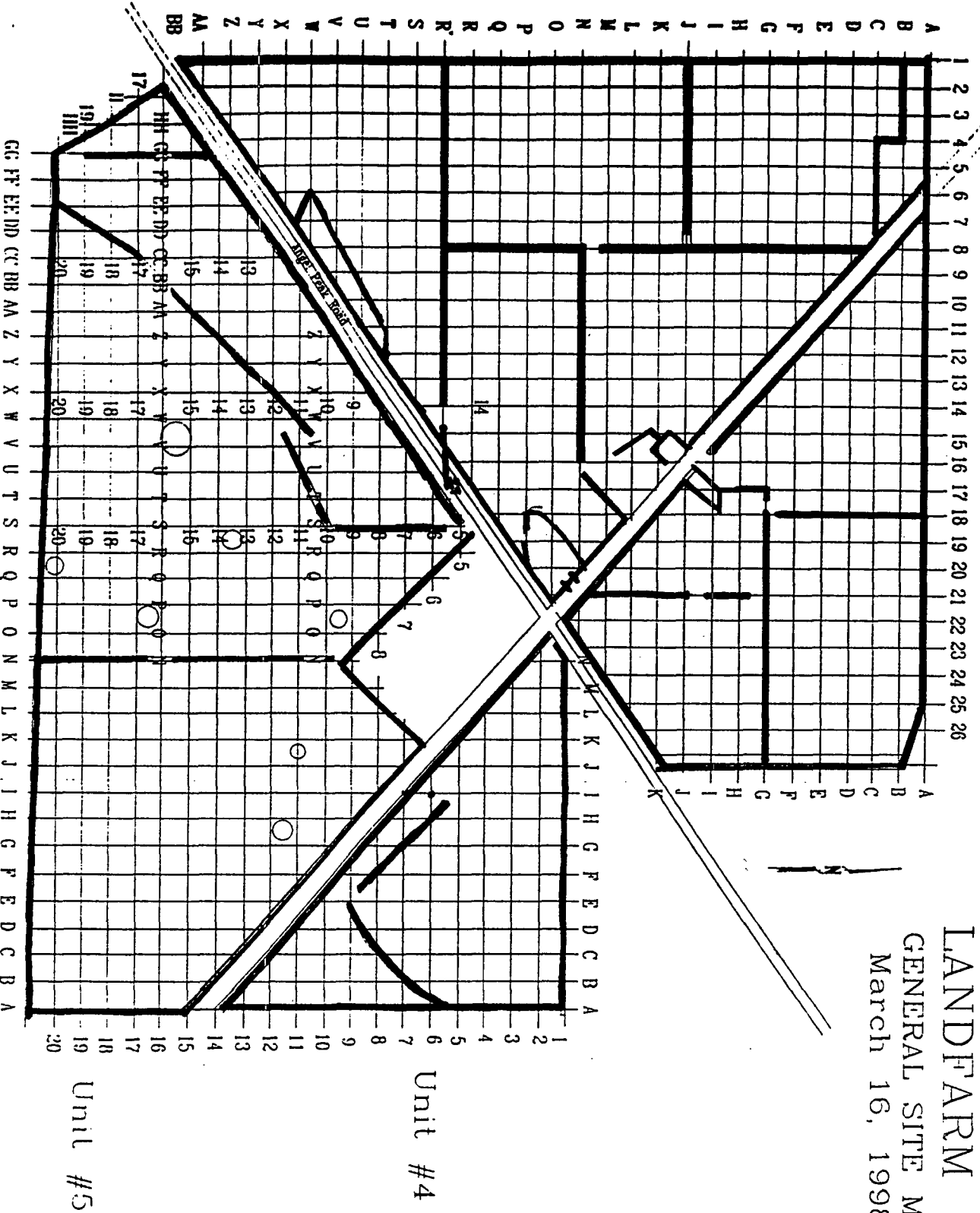
Christine M Walters  
Biologist

# ENVIROTECH INC.

## LANDFARM #2

### GENERAL SITE MAP

March 16, 1998

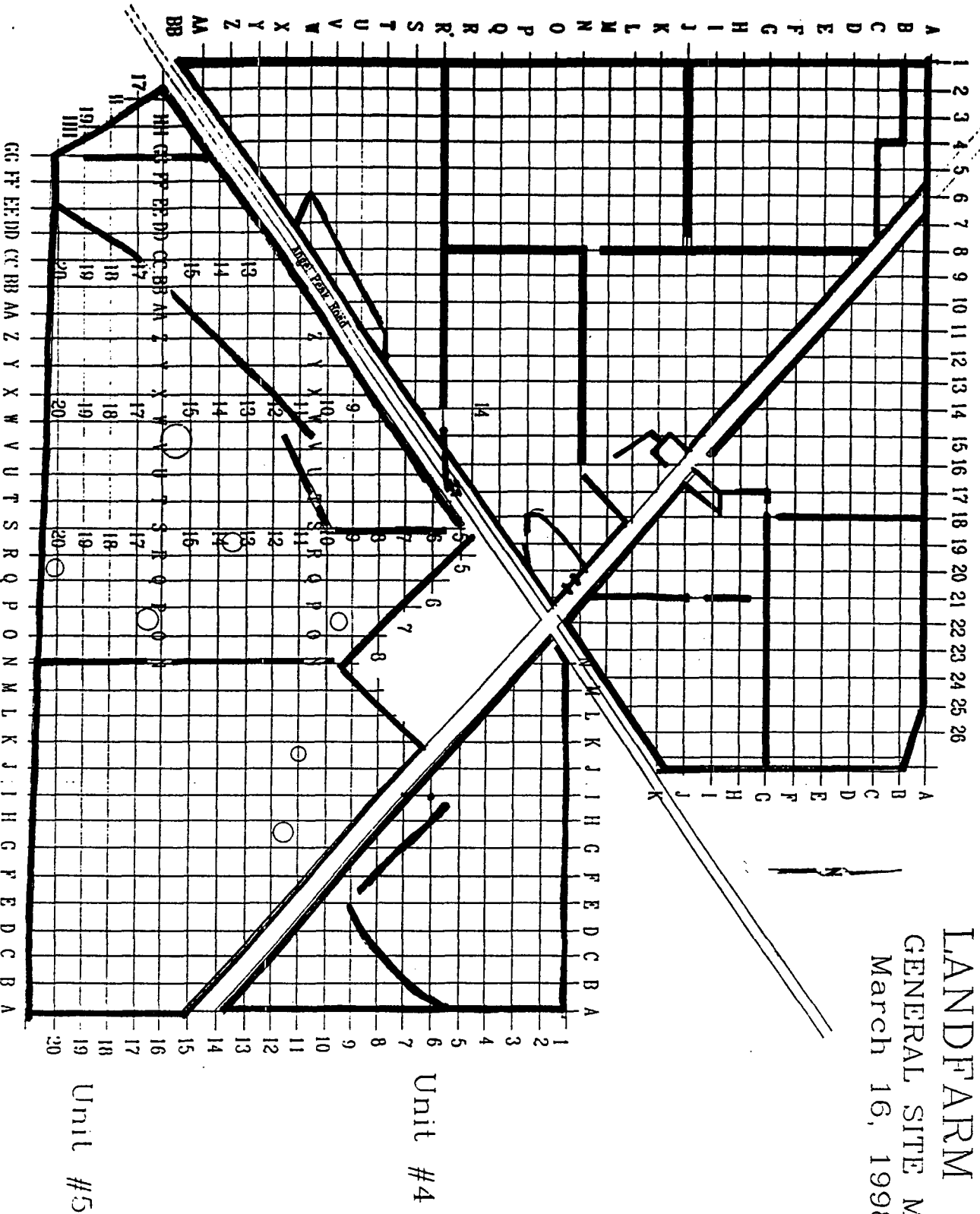


# ENVIROTECH INC.

## LANDFARM #2

### GENERAL SITE MAP

March 16, 1998

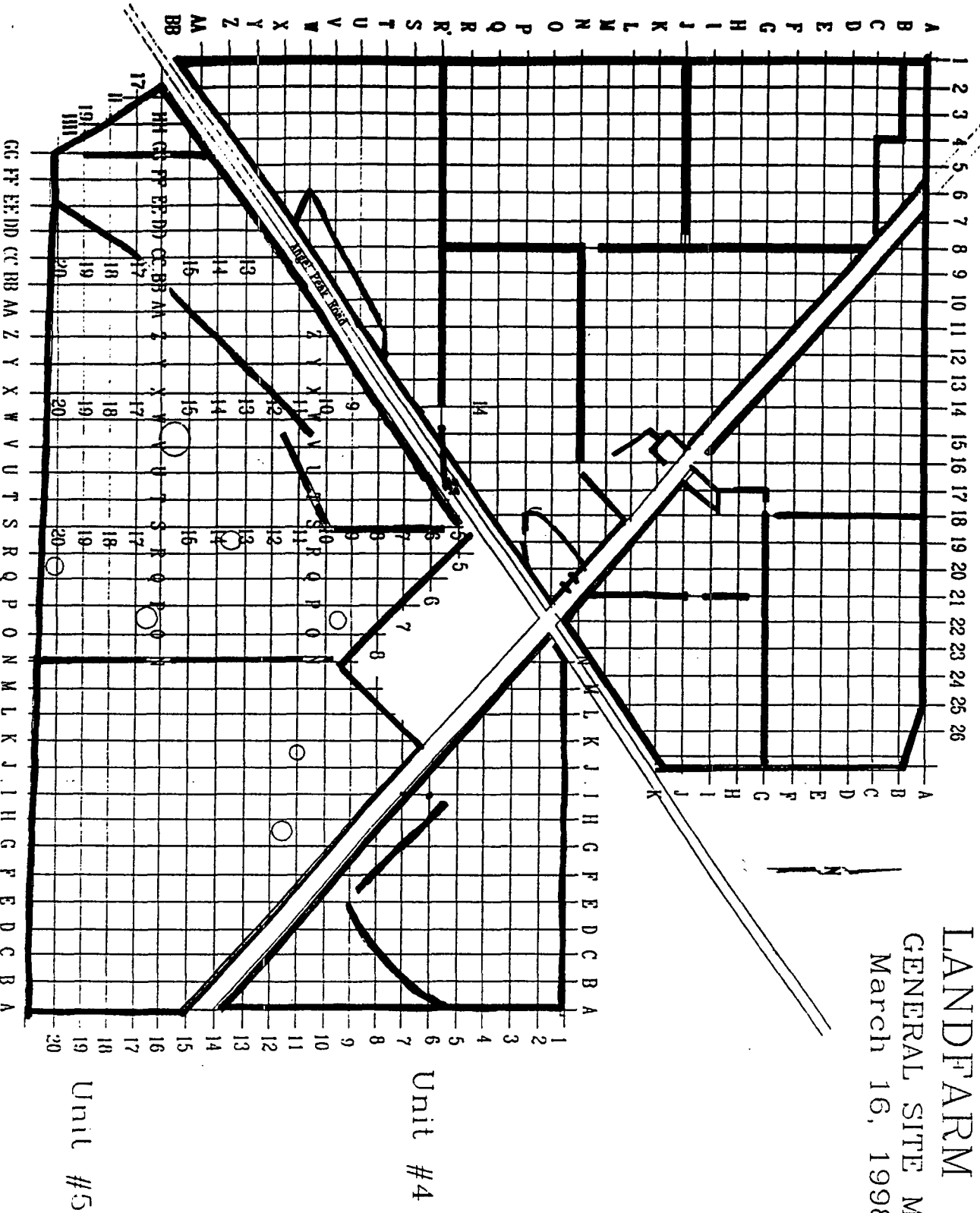


# ENVIROTECH INC.

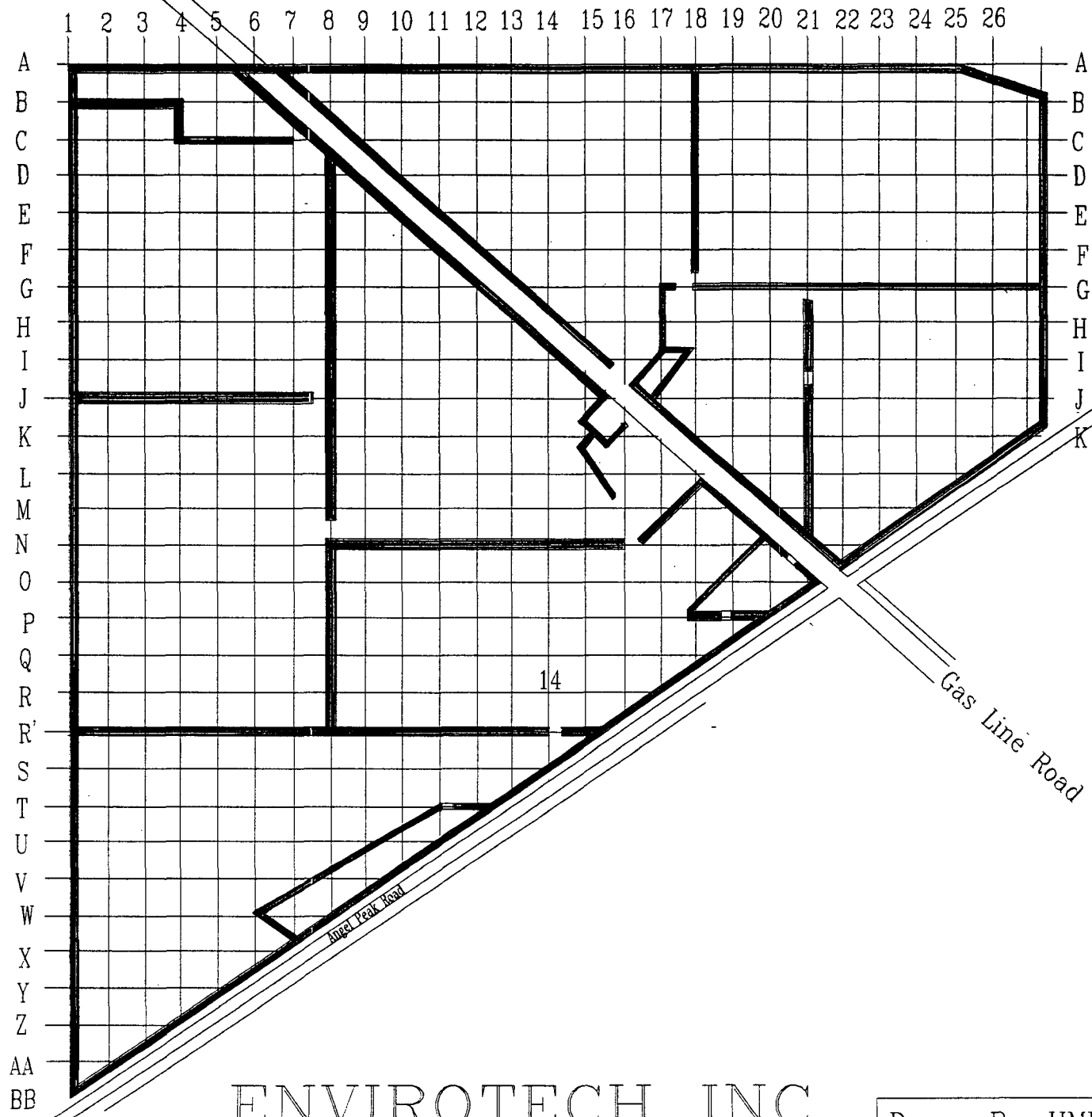
## LANDFARM #2

### GENERAL SITE MAP

March 16, 1998



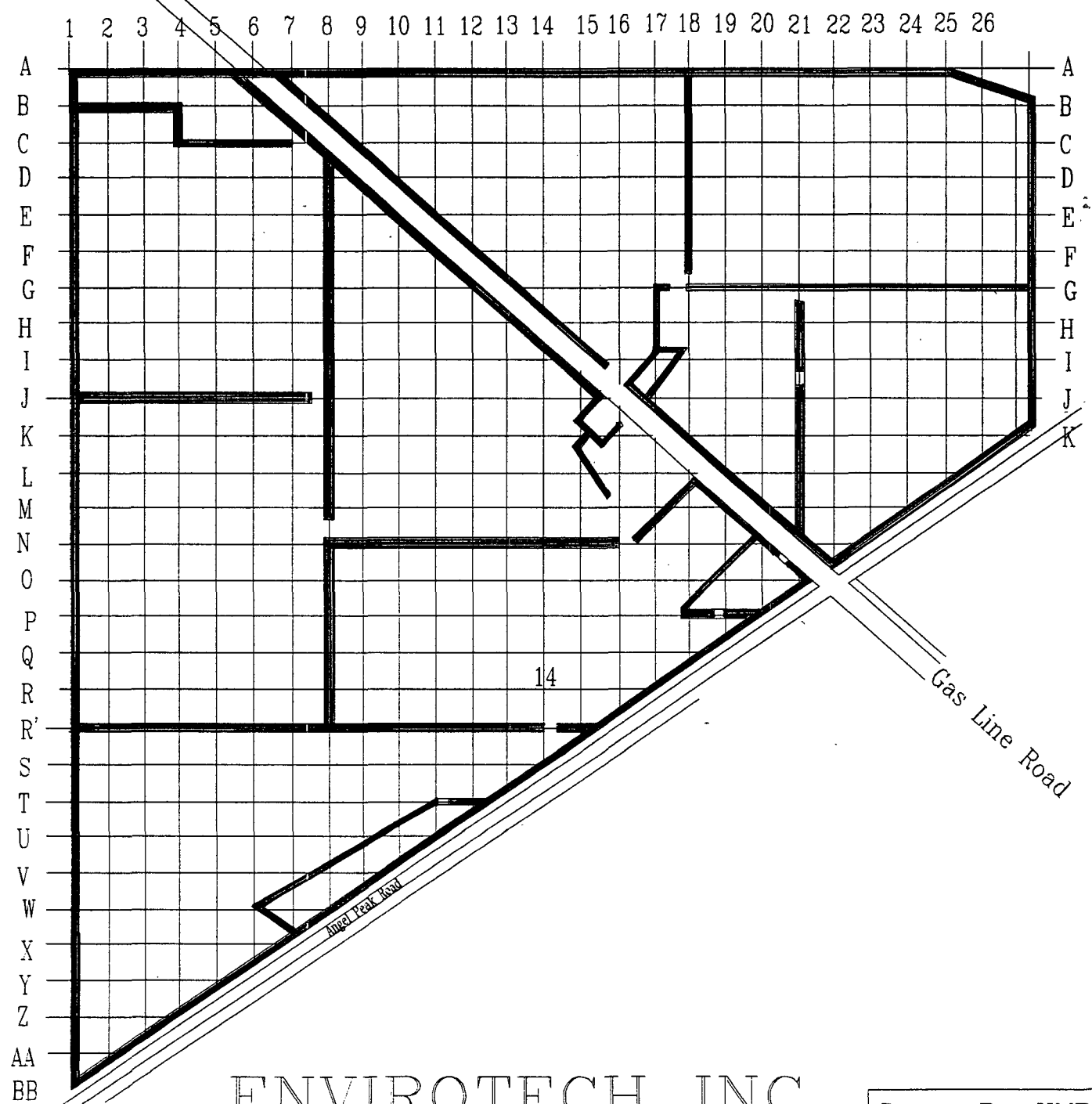
07/0



ENVIROTECH INC.  
LANDFARM #2

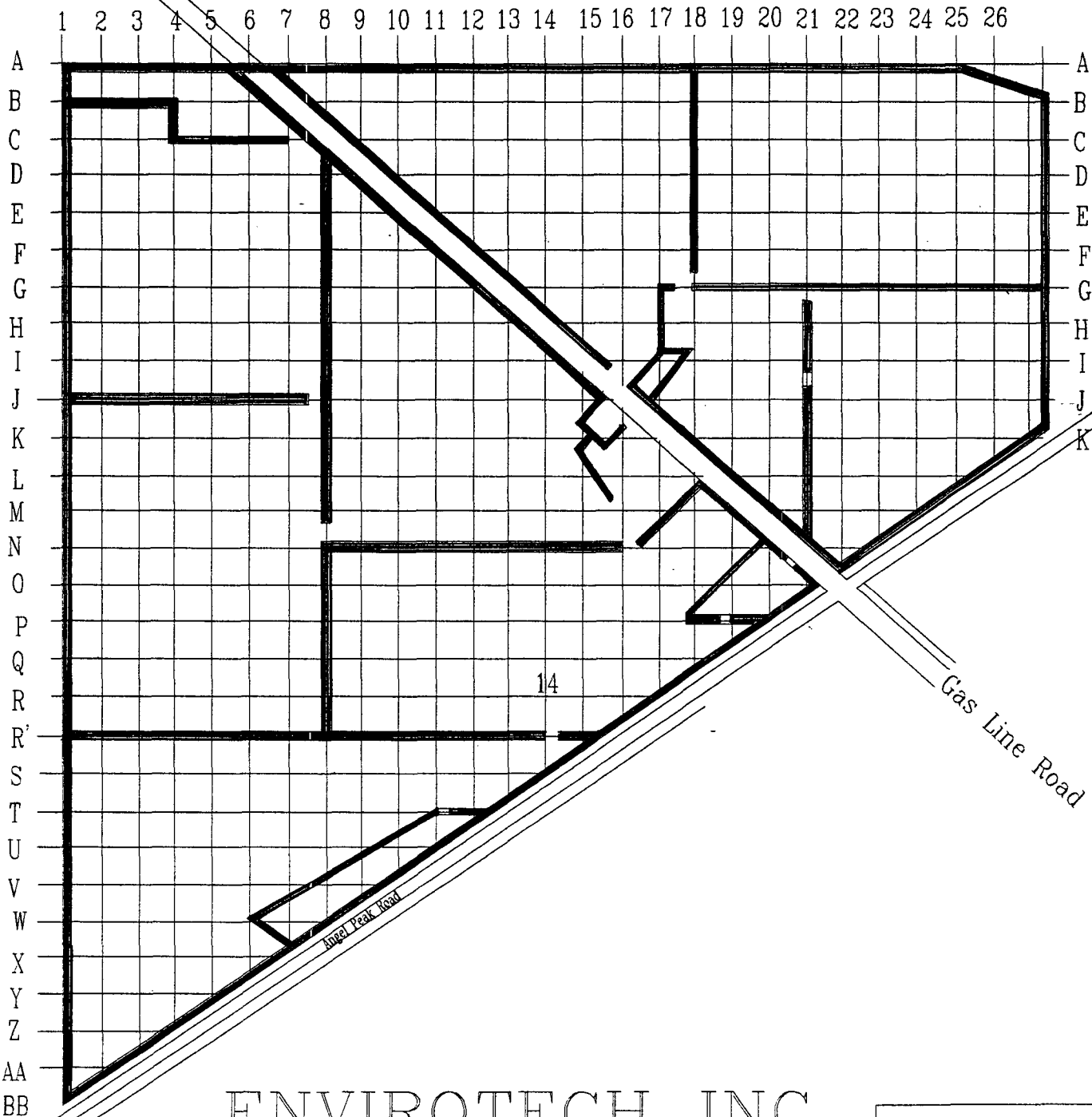
C:\envi\work\landrm2

Drawn By: HMB
Revised: 3-16-98



ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB  
Revised: 3-16-98

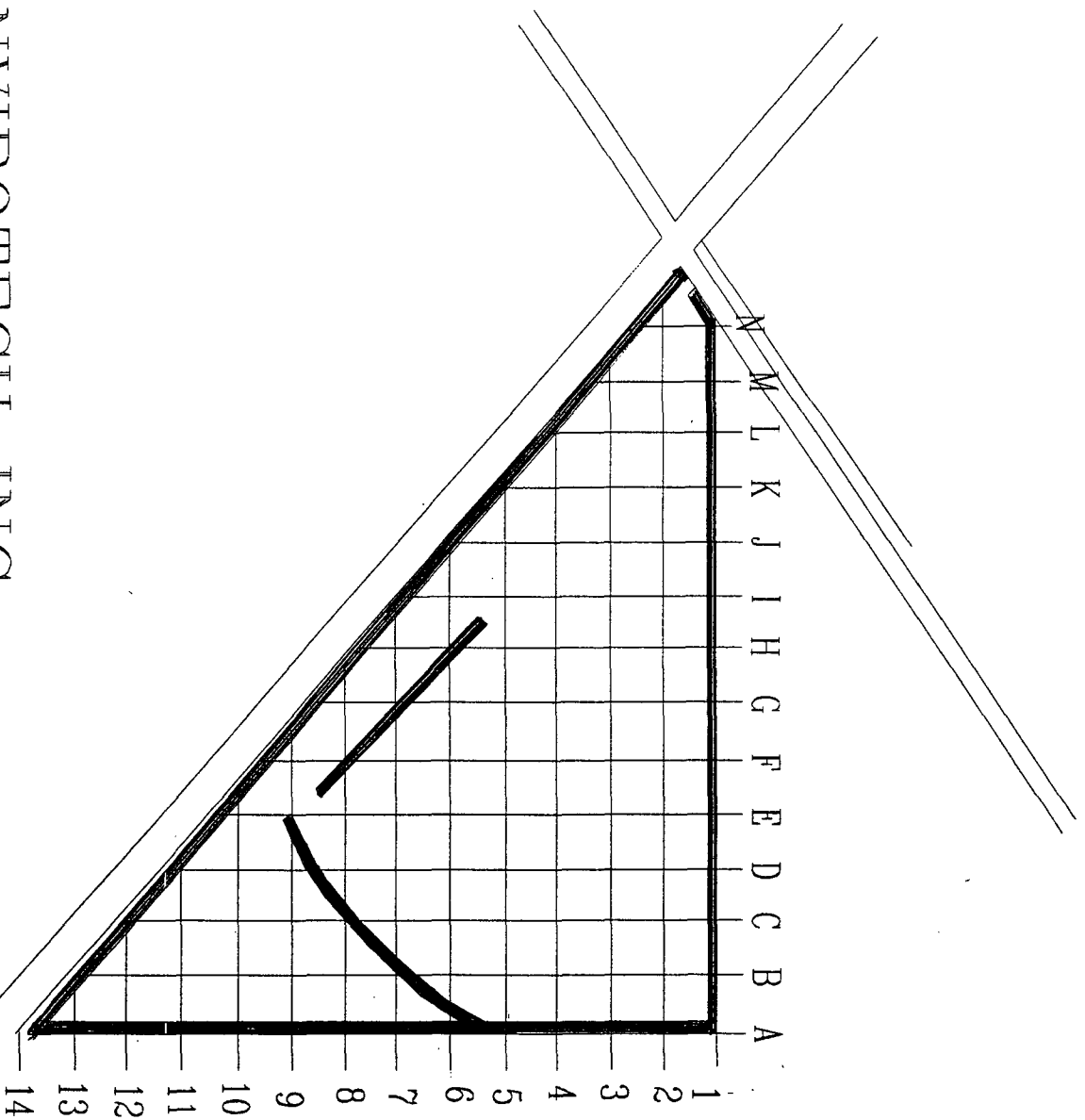


ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB
Revised: 3-16-98



# ENVIROTECH INC. LANDFARM #2 UNIT #4



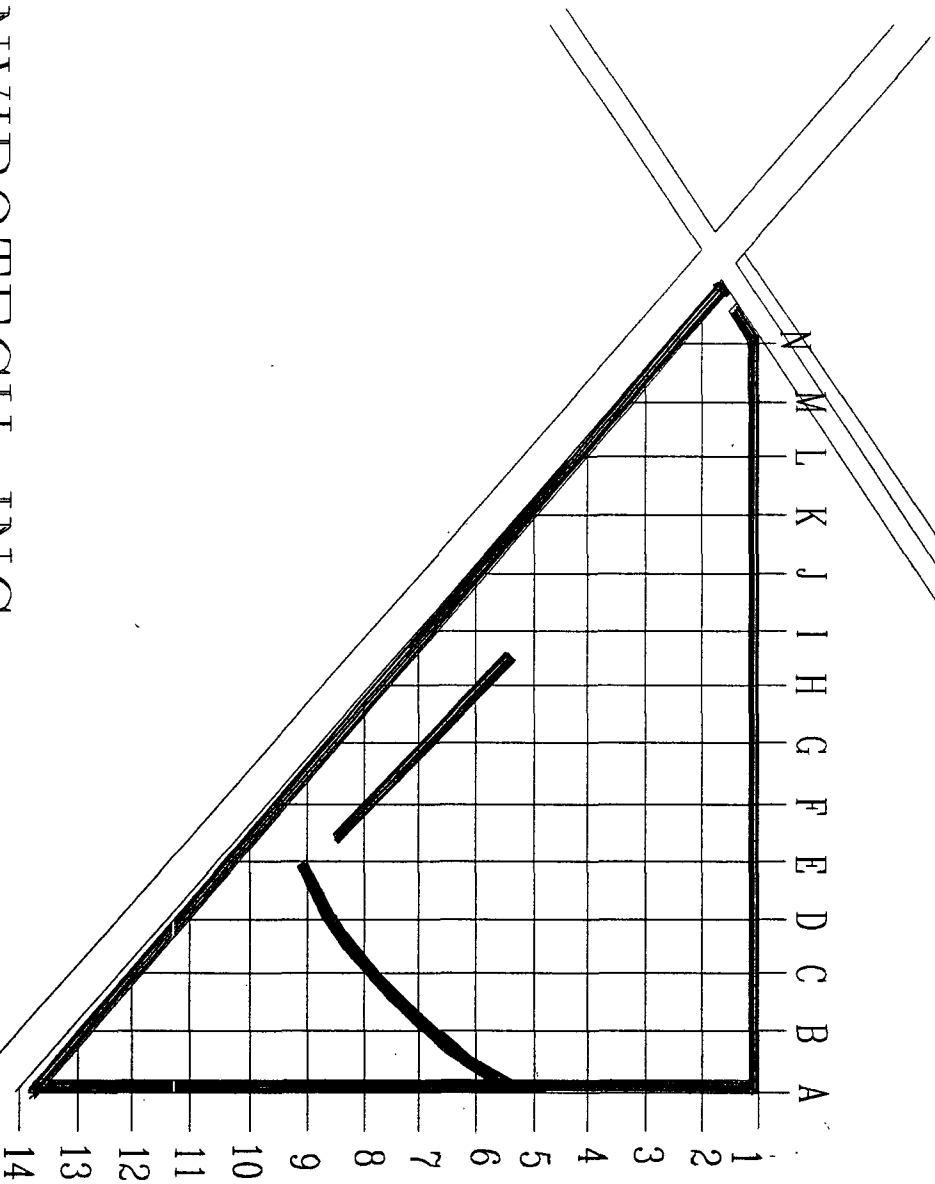
Unit #4

Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\lf2unit4

# ENVIROTECH INC. LANDFARM #2 UNIT #4

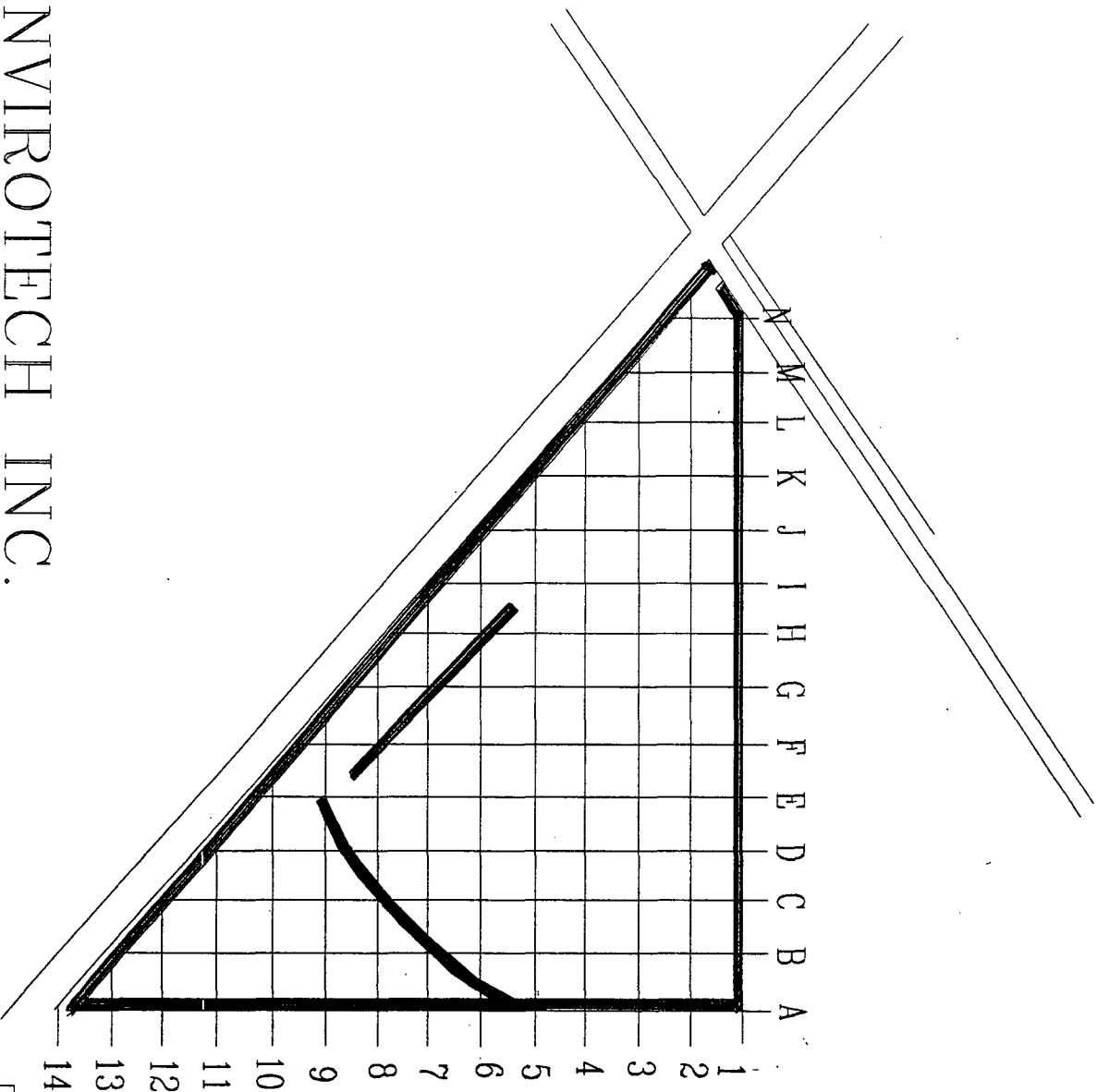


Unit #4

Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\112unit4



Unit #4

ENVIROTECH INC.  
LANDFARM #2  
UNIT #4

Drawn By: HMB  
Revised: 3-16-98

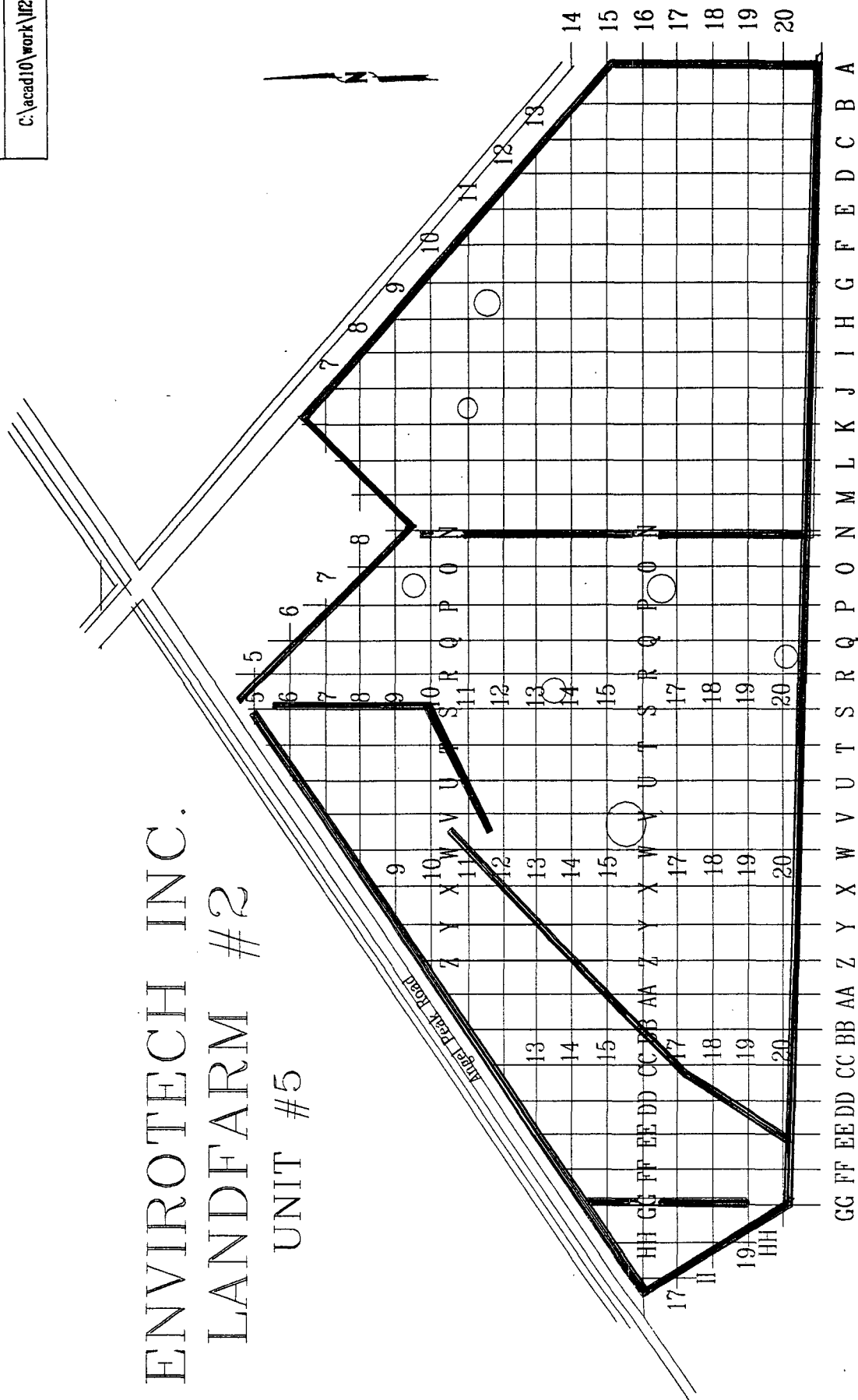
c:\acad10\work\lf2unit4

Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\112unit15

ENVIROTECH INC.  
LANDFARM #2  
UNIT #5

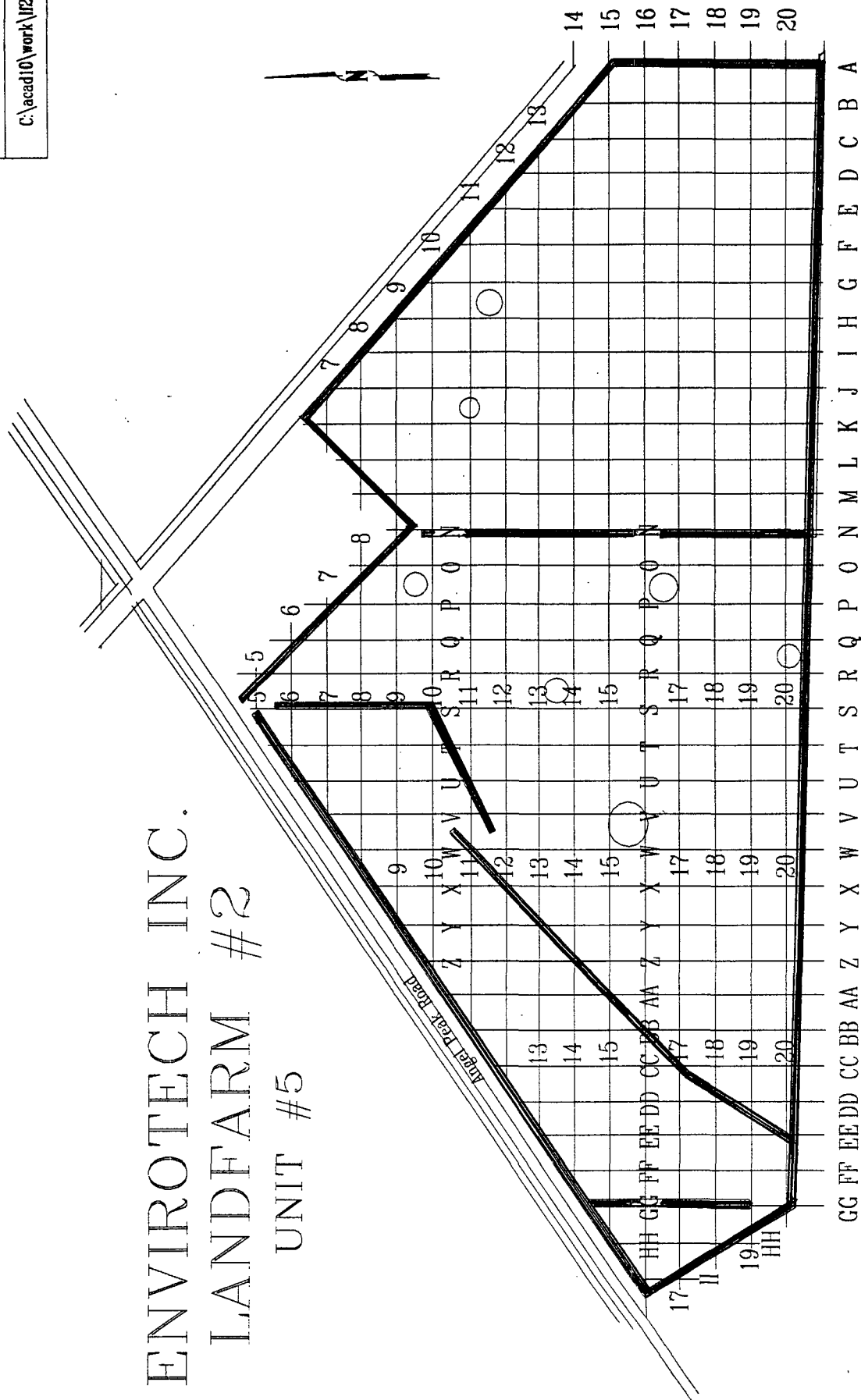


Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\112unit5

ENVIROTECH INC.  
LANDFARM #2  
UNIT #5



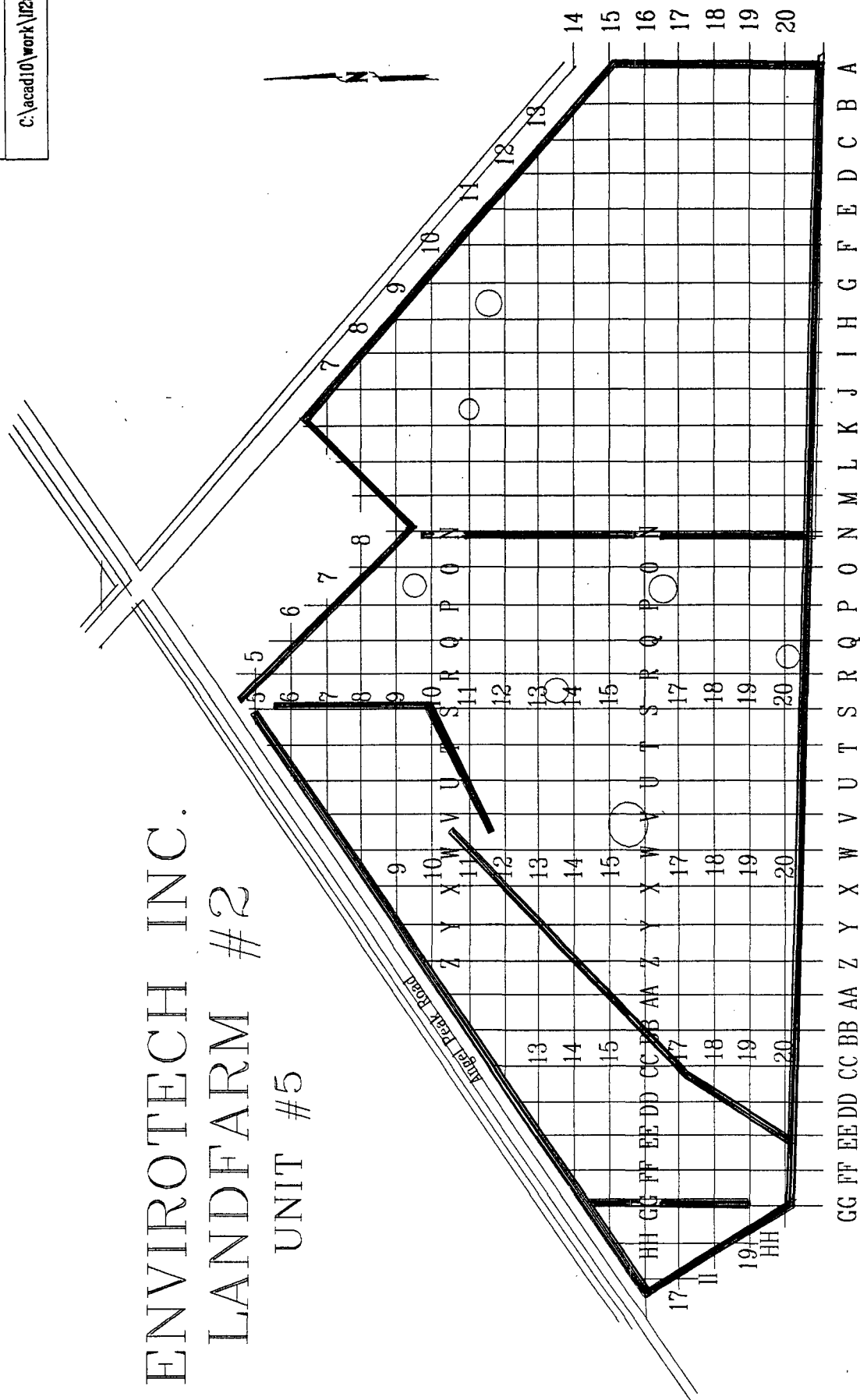
Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\12unit15

# ENVIROTECH INC. LANDFARM #2

## UNIT #5



# envirotech mem o/f a x

to: Martype J. Kieling

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

fax #: (505) 827-8177

re: Envirotech Landform 2

date: 4.17.98

pages: Five (including cover sheet)

project: \_\_\_\_\_

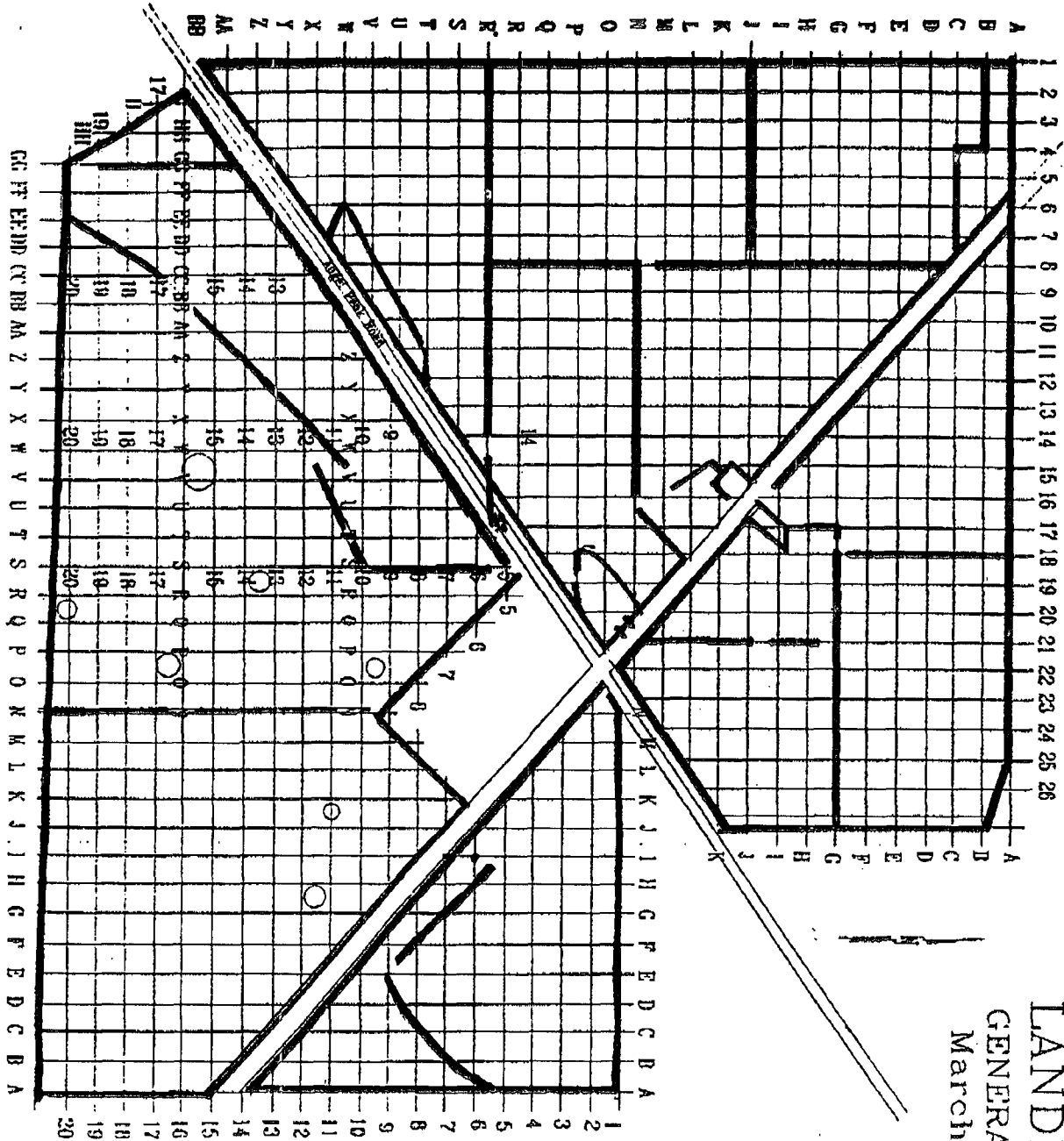
cc: \_\_\_\_\_

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

from the desk of... Christine Wooten

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



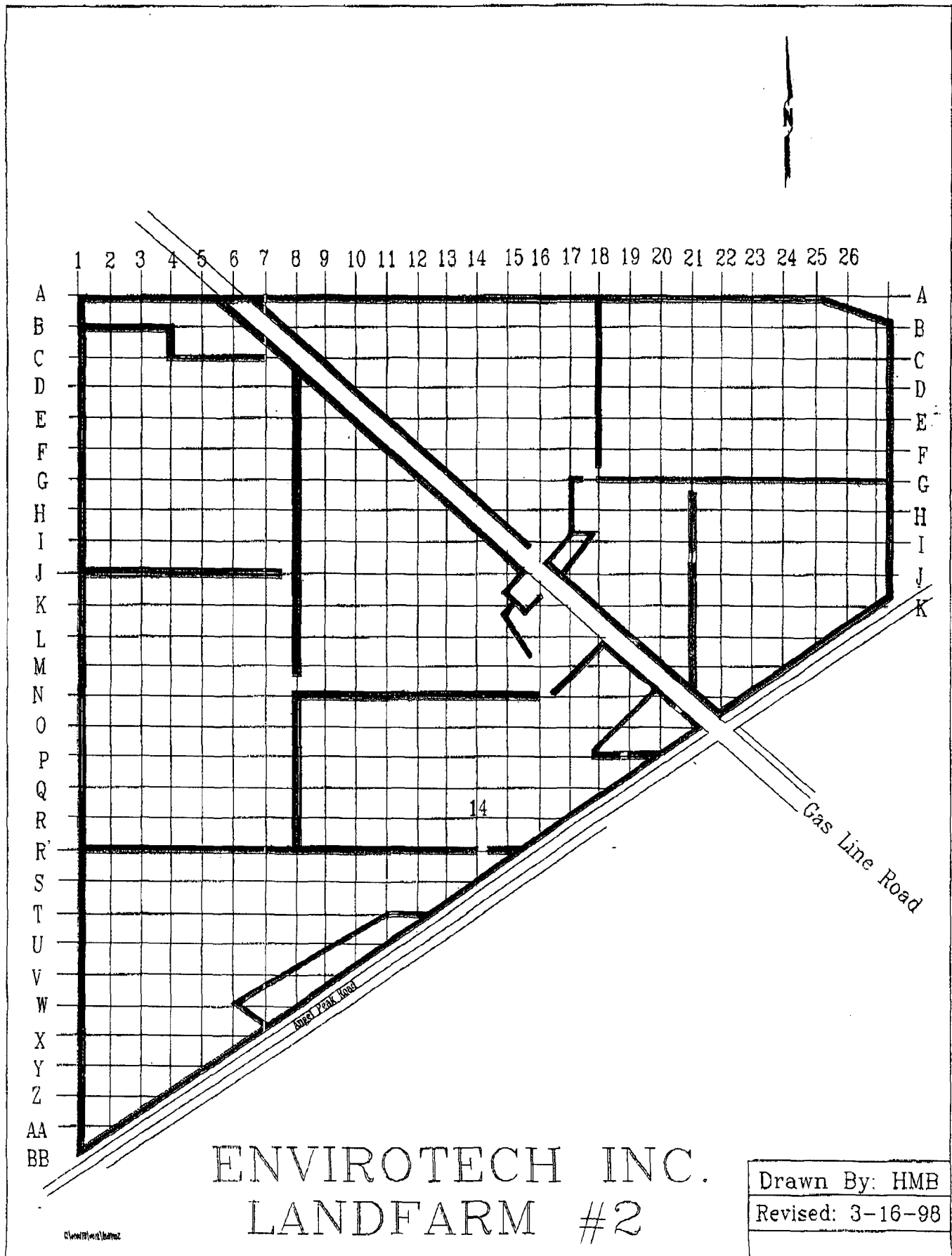


ENVIROTECH INC.

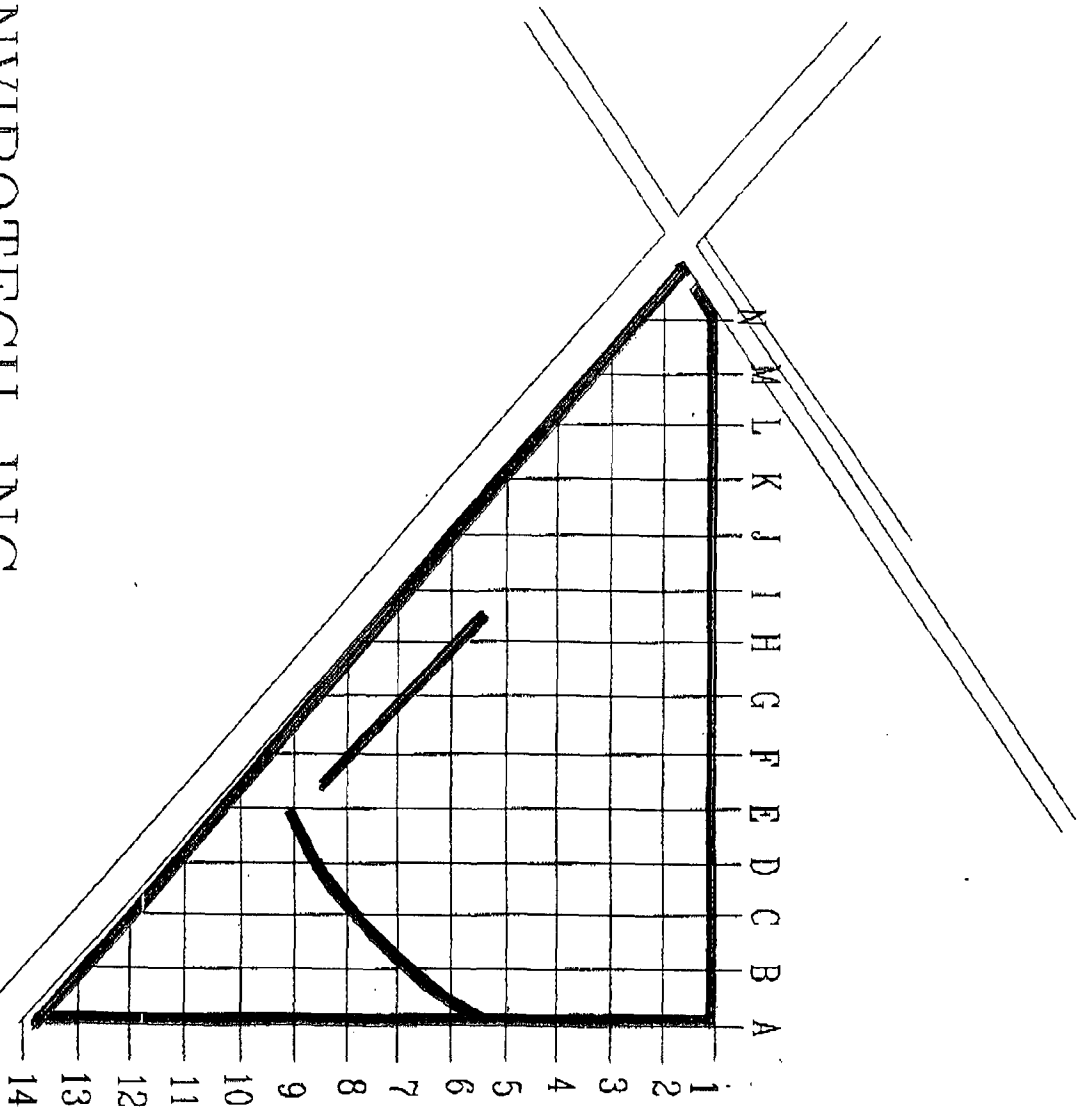
LANDFARM #2

GENERAL SITE MAP

March 16, 1998



ENVIROTECH INC.  
LANDFARM #2  
UNIT #4

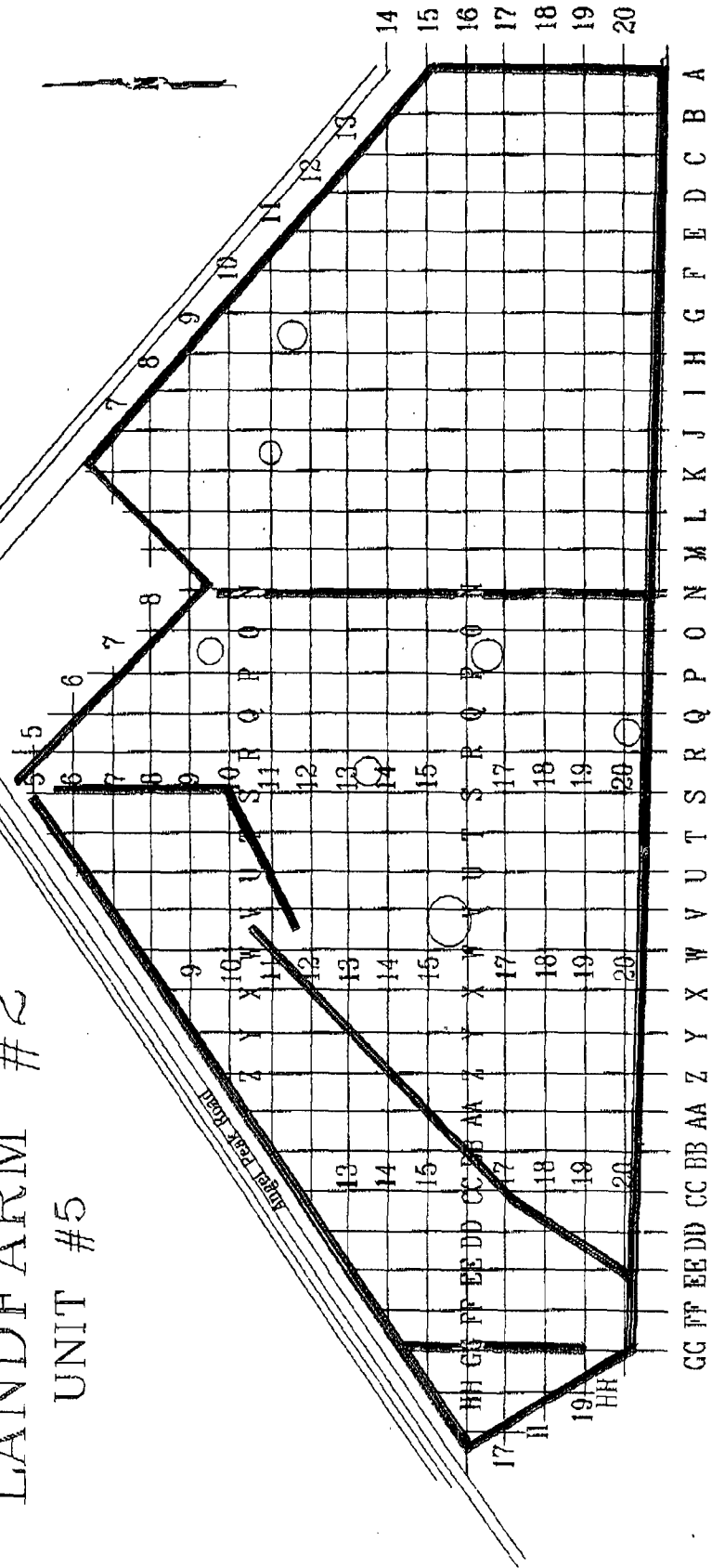


Unit #4

Drawn By: HMB
Revised: 3-16-98
C:\acad10\work\lrandm4

Drawn By: HMB  
Revised: 3-16-98  
C:\acad10\work\12\unit5

ENVIROTECH INC.  
LANDFARM #2  
UNIT #5





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

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

April 17, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-418**

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 unit 4 cells of Land Farm # 2 are hereby approved for discontinued maintenance status:

Cell A-11	Cell N-8	Cell P-4	Cell R-10
Cell A-24	Cell N-9	Cell P-5	Cell R-11
Cell B-12	Cell N-10	Cell P-8	Cell R-13
Cell C-19	Cell N-11	Cell P-17	Cell R-16
Cell K-4	Cell N-12	Cell Q-1	Cell R'-1
Cell L-8	Cell N-17	Cell Q-2	Cell R'-2
Cell L-9	Cell N-18	Cell Q-3	Cell R'-3
Cell L-13	Cell O-1	Cell Q-4	Cell R'-4
Cell M-5	Cell O-2	Cell Q-5	Cell R'-5
Cell M-6	Cell O-3	Cell Q-8	Cell R'-6
Cell M-9	Cell O-4	Cell Q-9	Cell R'-7
Cell N-1	Cell O-5	Cell Q-10	Cell R'-8
Cell N-2	Cell O-7	Cell Q-11	Cell R'-9
Cell N-3	Cell O-17	Cell Q-16	Cell R'-10
Cell N-4	Cell O-18	Cell Q-17	Cell R'-11
Cell N-5	Cell P-1	Cell R-5	Cell R'-12
Cell N-6	Cell P-2	Cell R-6	Cell R'-13
Cell N-7	Cell P-3	Cell R-9	Cell R'-14

Mr. Young  
April 17, 1998  
Page 2

Cell R'-15	Cell S-15	Cell V-1	Cell Y-3
Cell R'-16	Cell T-1	Cell V-2	Cell Y-4
Cell S-1	Cell T-2	Cell V-3	Cell Z-1
Cell S-2	Cell T-4	Cell V-4	Cell Z-2
Cell S-3	Cell T-5	Cell V-5	Cell Z-3
Cell S-4	Cell T-6	Cell W-1	Cell Z-4
Cell S-5	Cell T-7	Cell W-2	Cell AA-1
Cell S-6	Cell T-8	Cell W-3	Cell AA-2
Cell S-7	Cell U-1	Cell W-4	Cell AA-3
Cell S-8	Cell U-2	Cell W-5	Cell AA-4
Cell S-9	Cell U-3	Cell X-1	Cell BB-1
Cell S-10	Cell U-4	Cell X-2	Cell BB-2
Cell S-11	Cell U-5	Cell X-3	Cell BB-3
Cell S-12	Cell U-6	Cell X-4	
Cell S-13	Cell U-7	Cell Y-1	
Cell S-14	Cell U-8	Cell Y-2	

Landfarm #2 Unit 4

U4 Cell A-1	U4 Cell C-3	U4 Cell E-3	U4 Cell I-1
U4 Cell A-2	U4 Cell C-4	U4 Cell E-4	U4 Cell I-2
U4 Cell A-3	U4 Cell C-5	U4 Cell E-5	U4 Cell I-5
U4 Cell A-4	U4 Cell C-6	U4 Cell E-9	U4 Cell I-6
U4 Cell A-7	U4 Cell C-7	U4 Cell F-1	U4 Cell I-7
U4 Cell A-8	U4 Cell C-8	U4 Cell F-2	U4 Cell J-2
U4 Cell A-10	U4 Cell C-9	U4 Cell F-5	U4 Cell J-3
U4 Cell B-1	U4 Cell C-10	U4 Cell F-8	U4 Cell J-4
U4 Cell B-2	U4 Cell C-11	U4 Cell F-9	U4 Cell J-5
U4 Cell B-3	U4 Cell C-12	U4 Cell G-1	U4 Cell J-6
U4 Cell B-4	U4 Cell D-1	U4 Cell G-2	U4 Cell K-4
U4 Cell B-5	U4 Cell D-2	U4 Cell G-3	U4 Cell K-5
U4 Cell B-6	U4 Cell D-3	U4 Cell G-5	U4 Cell L-1
U4 Cell B-7	U4 Cell D-4	U4 Cell G-7	U4 Cell L-2
U4 Cell B-8	U4 Cell D-5	U4 Cell G-8	U4 Cell L-3
U4 Cell B-9	U4 Cell D-7	U4 Cell H-1	U4 Cell L-4
U4 Cell B-10	U4 Cell D-8	U4 Cell H-2	U4 Cell M-1
U4 Cell B-11	U4 Cell D-9	U4 Cell H-4	U4 Cell M-2
U4 Cell B-12	U4 Cell D-10	U4 Cell H-5	U4 Cell N-1
U4 Cell C-1	U4 Cell E-1	U4 Cell H-6	
U4 Cell C-2	U4 Cell E-2	U4 Cell H-7	


Mr. Young  
April 17, 1998  
Page 3

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,

  
Martyn J. Kielling  
Environmental Geologist

xc: OCD Aztec Office



# LANDFARM # 2

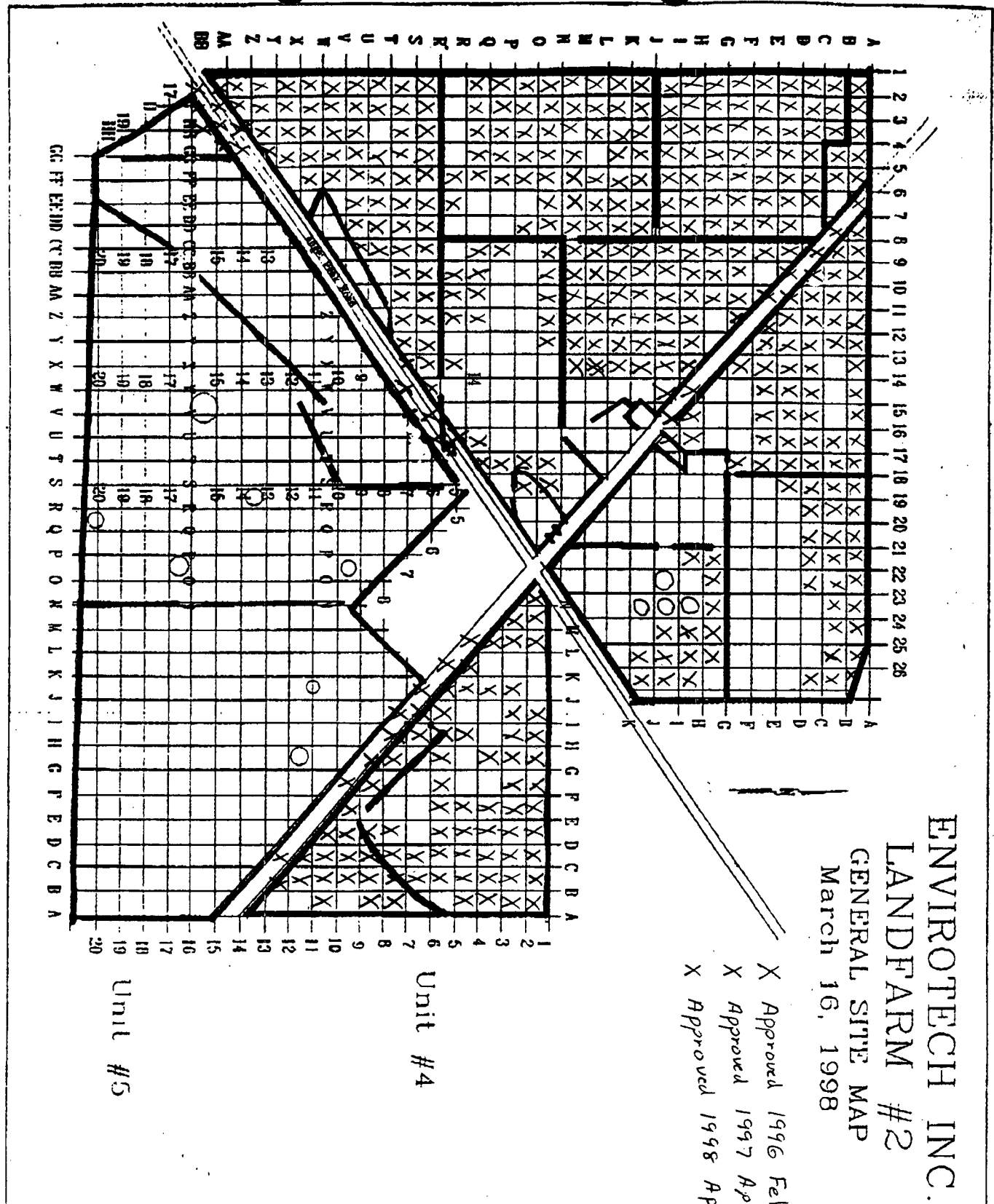
Cells submitted to OCD on 2/98 for Discontinued Maintenance Status by Envirotech Inc.

A-11 ✓	O-04 ✓	R-11 ✓	S-10 ✓	W-02 ✓
A-24 ✓	O-05 ✓	R-13 ✓	S-11 ✓	W-03 ✓
B-12 ✓	O-07 ✓	R-16 ✓	S-12 ✓	W-04 ✓
C-19 ✓	O-17 ✓	R'-01 ✓	S-13 ✓	W-05 ✓
K-04 ✓	O-18 ✓	R'-03 ✓	S-14 ✓	X-01 ✓
L-08 ✓	P-01 ✓	R'-04 ✓	S-15 ✓	X-02 ✓
L-09 ✓	P-02 ✓	R'-05 ✓	T-01 ✓	X-03 ✓
L-13 ✓	P-03 ✓	R'-06 ✓	T-02 ✓	X-04 ✓
M-05 ✓	P-04 ✓	R'-07 ✓	T-04 ✓	Y-01 ✓
M-06 ✓	P-05 ✓	R'-08 ✓	T-05 ✓	Y-02 ✓
M-09 ✓	P-08 ✓	R'-09 ✓	T-06 ✓	Y-03 ✓
N-01 ✓	P-17 ✓	R'-10 ✓	T-07 ✓	Y-04 ✓
N-02 ✓	Q-01 ✓	R'-11 ✓	T-08 ✓	Z-01 ✓
N-03 ✓	Q-02 ✓	R'-12 ✓	U-01 ✓	Z-02 ✓
N-04 ✓	Q-03 ✓	R'-13 ✓	U-02 ✓	Z-03 ✓
N-05 ✓	Q-04 ✓	R'-14 ✓	U-03 ✓	Z-04 ✓
N-06 ✓	Q-05 ✓	R'-15 ✓	U-04 ✓	AA-01 ✓
N-07 ✓	Q-08 ✓	R'-16 ✓	U-05 ✓	AA-02 ✓
N-08 ✓	Q-09 ✓	S-01 ✓	U-06 ✓	AA-03 ✓
N-09 ✓	Q-10 ✓	S-02 ✓	U-07 ✓	AA-04 ✓
N-10 ✓	Q-11 ✓	S-03 ✓	U-08 ✓	BB-01 ✓
N-11 ✓	Q-16 ✓	S-04 ✓	V-01 ✓	BB-02 ✓
N-12 ✓	Q-17 ✓	S-05 ✓	V-02 ✓	BB-03 ✓
N-17 ✓	R-05 ✓	S-06 ✓	V-03 ✓	
N-18 ✓	R-06 ✓	S-07 ✓	V-04 ✓	
02.7 ✓ O-01 ✓	R-09 ✓	S-08 ✓	V-05 ✓	
0-02 ✓	R-10 ✓	S-09 ✓	W-01 ✓	

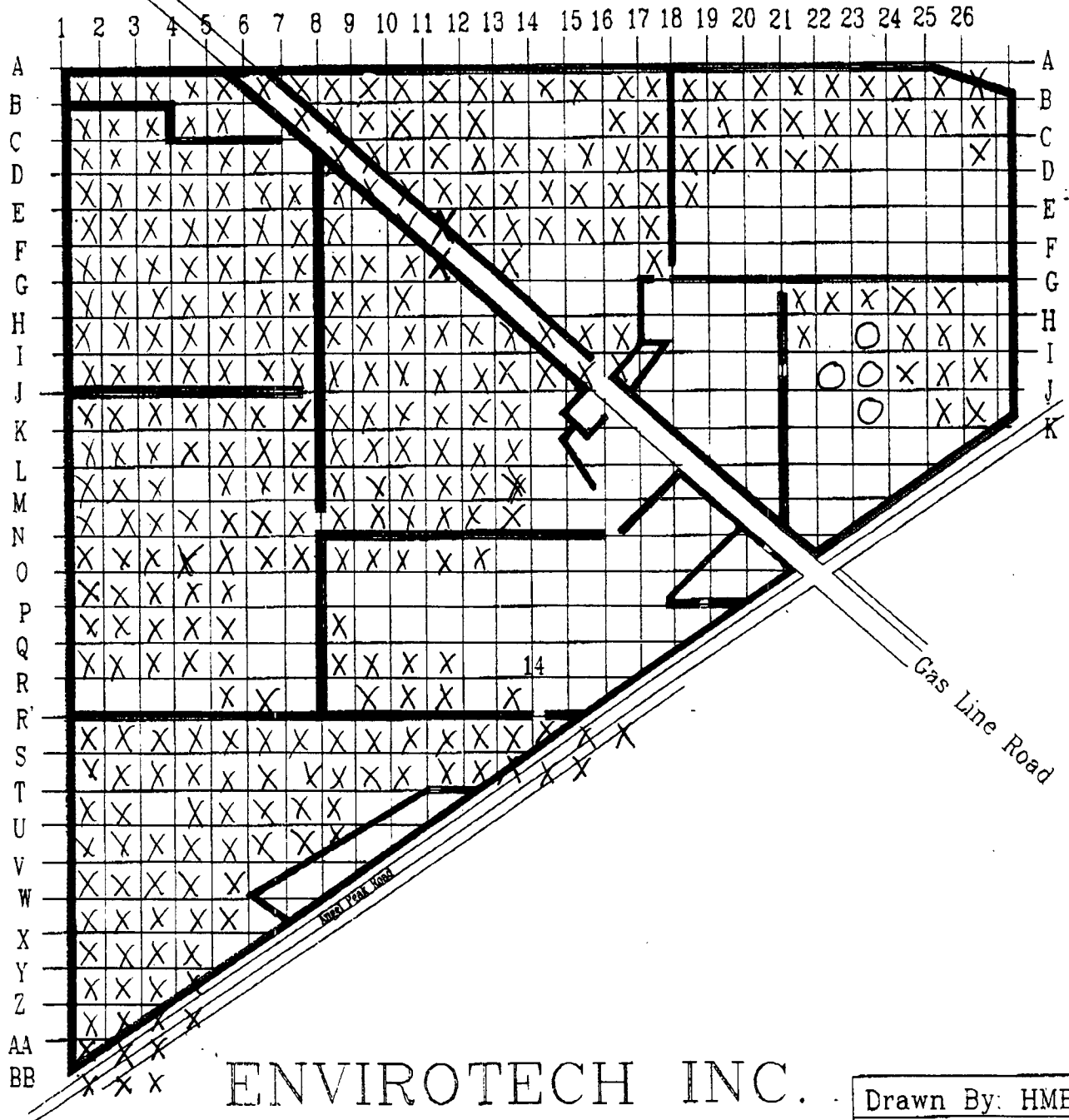
# LANDFARM # 2 UNIT 4

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

A-01 ✓	C-09 ✗	G-05 ✗	N-01 ✗
A-02 ✓	C-10 ✗	G-07 ✗	
A-03 ✓	C-11 ✗	G-08 ✗	
A-04 ✗	C-12 ✗	H-01 ✗	
A-07 ✗	D-01 ✗	H-02 ✗	
A-08 ✗	D-02 ✗	H-04 ✗	
A-10 ✗	D-03 ✗	H-05 ✗	
B-01 ✗	D-04 ✗	H-06 ✗	
B-02 ✓	D-05 ✗	H-07 ✗	
B-03 ✓	D-07 ✗	I-01 ✗	
B-04 ✗	D-08 ✗	I-02 ✗	
B-05 ✗	D-09 ✗	I-05 ✗	
B-06 ✗	D-10 ✗	I-06 ✗	
B-07 ✗	E-01 ✗	I-07 ✗	
B-08 ✗	E-02 ✗	J-02 ✗	
B-09 ✗	E-03 ✗	J-03 ✗	
B-10 ✓	E-04 ✗	J-04 ✗	
B-11 ✗	E-05 ✗	J-05 ✗	
B-12 ✗	E-09 ✗	J-06 ✗	
C-01 ✗	F-01 ✗	K-04 ✗	
C-02 ✗	F-02 ✗	K-05 ✗	
C-03 ✗	F-05 ✗	L-01 ✗	
C-04 ✗	F-08 ✗	L-02 ✗	
C-05 ✗	F-09 ✗	L-03 ✗	
C-06 ✗	G-01 ✗	L-04 ✗	
C-07 ✗	G-02 ✗	M-01 ✗	
C-08 ✗	G-03 ✗	M-02 ✗	



Approved	1996	February 7, June 3
X Approved	1997	April
X Approved	1998	April 17

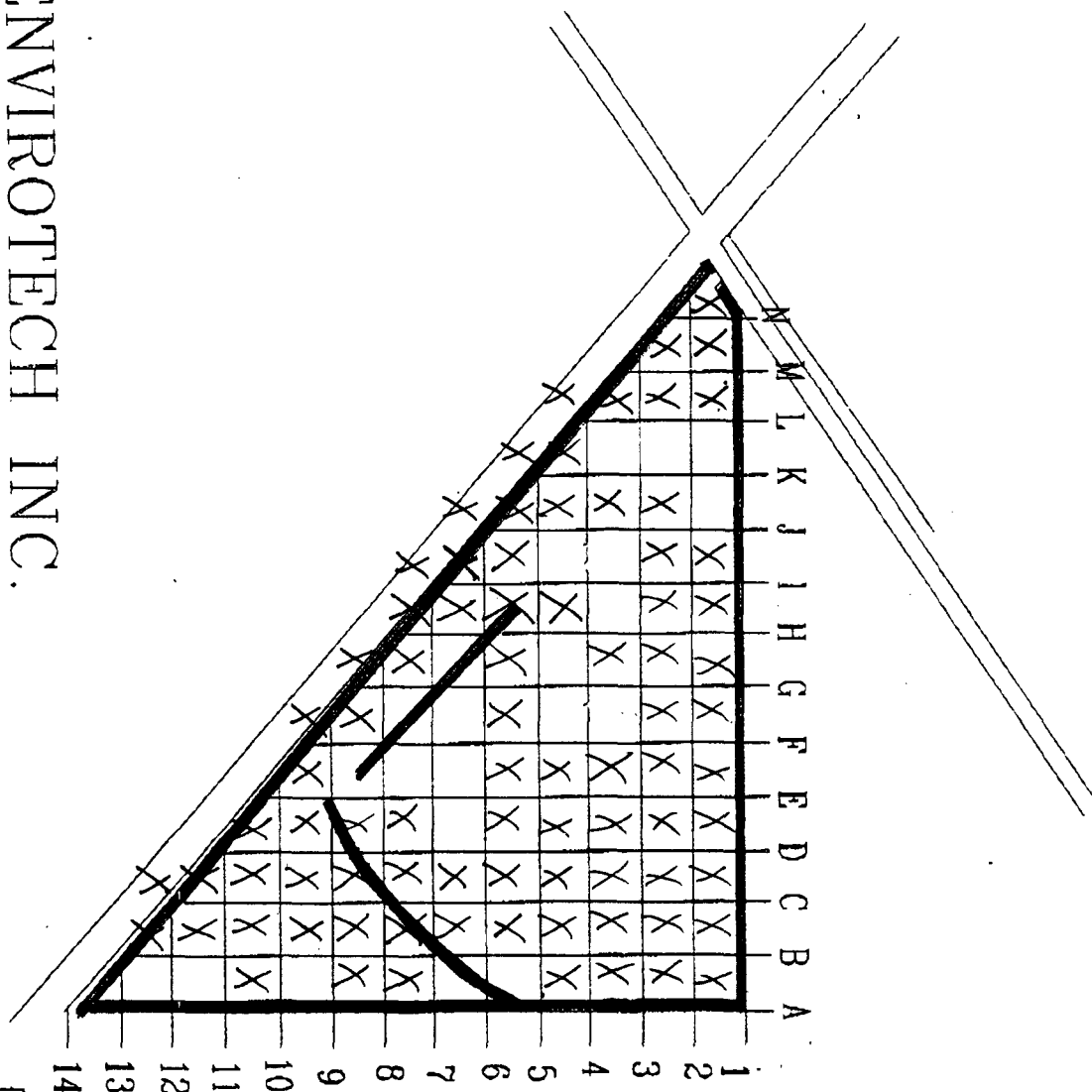


ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB

Revised: 3-16-98

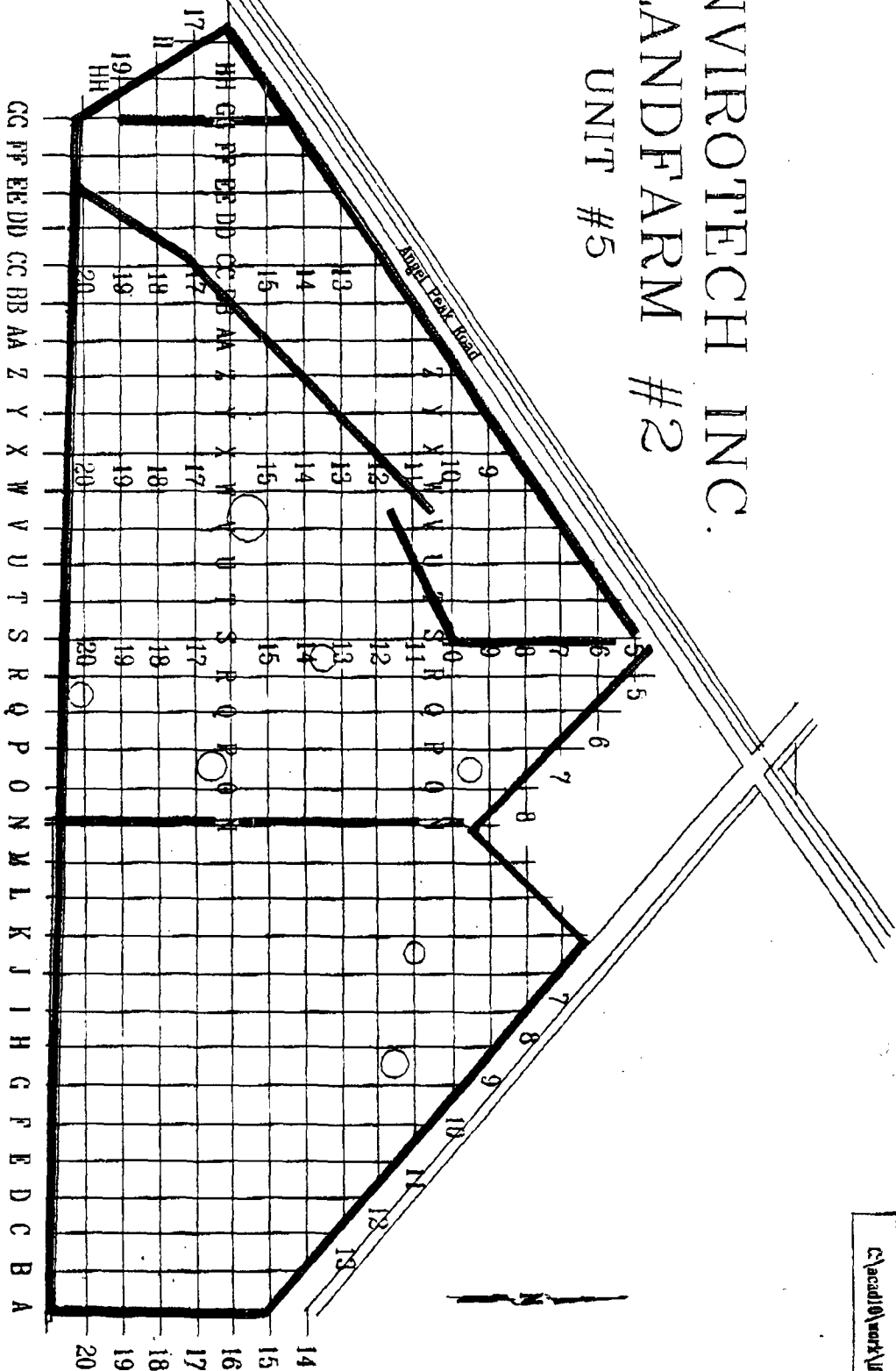
ENVIROTECH INC.  
LANDFARM #2  
UNIT #4



Unit #4

Drawn By: HMB
Revised: 3-16-98
C:\arcad10\work\lraunit4

# ENVIROTECH INC. LANDFARM #2 UNIT #5



Drawn By: HMB
Revised: 3-16-98
C:\acad\0\work\102\unit5

# envirotech mem o/f a x

to: Martynne J. Kieling

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

fax #: (505) 827-8177

re: Envirotech Landform 2

date: 4.17.98

pages: Five (including cover sheet)

project: \_\_\_\_\_

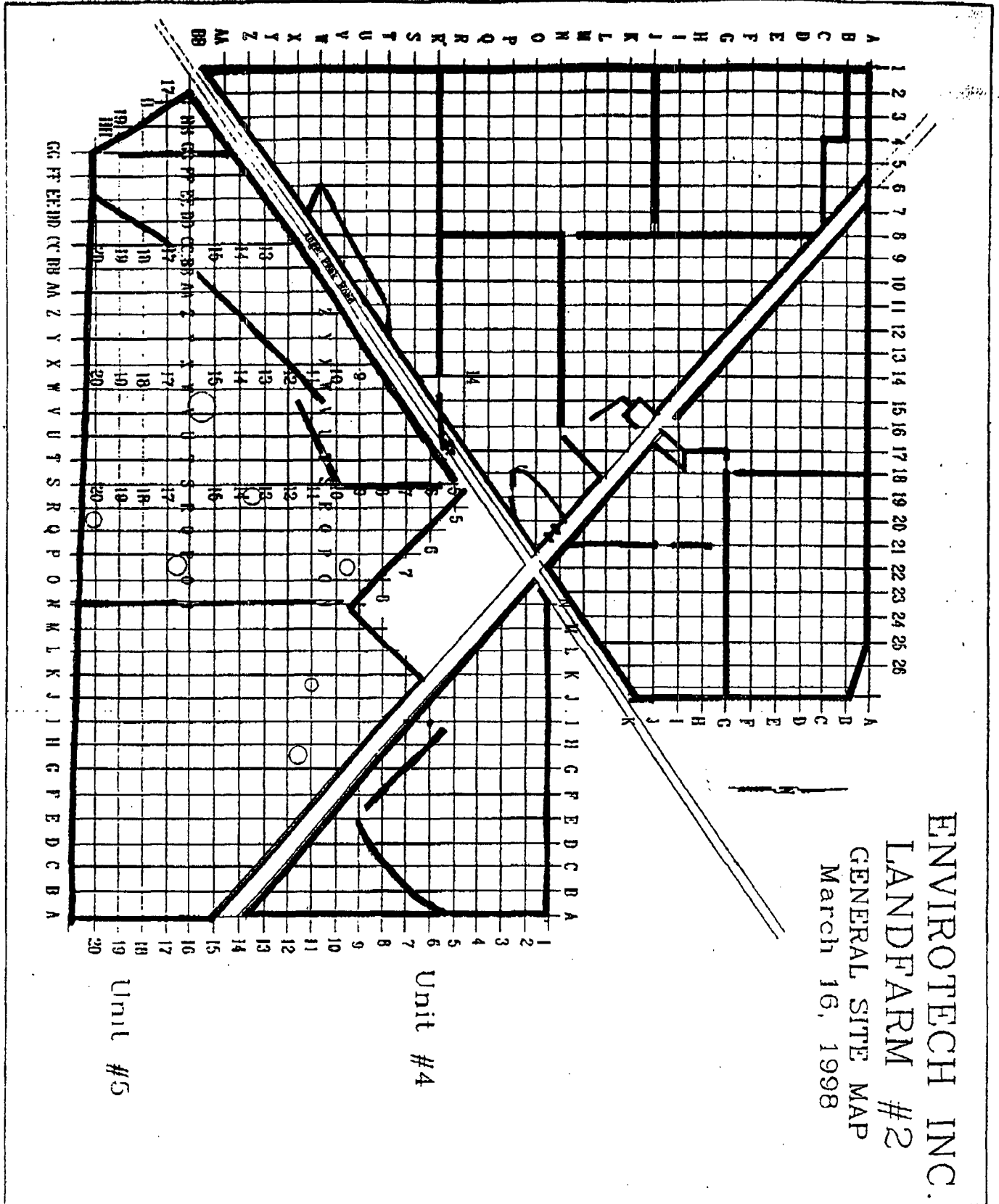
cc: \_\_\_\_\_

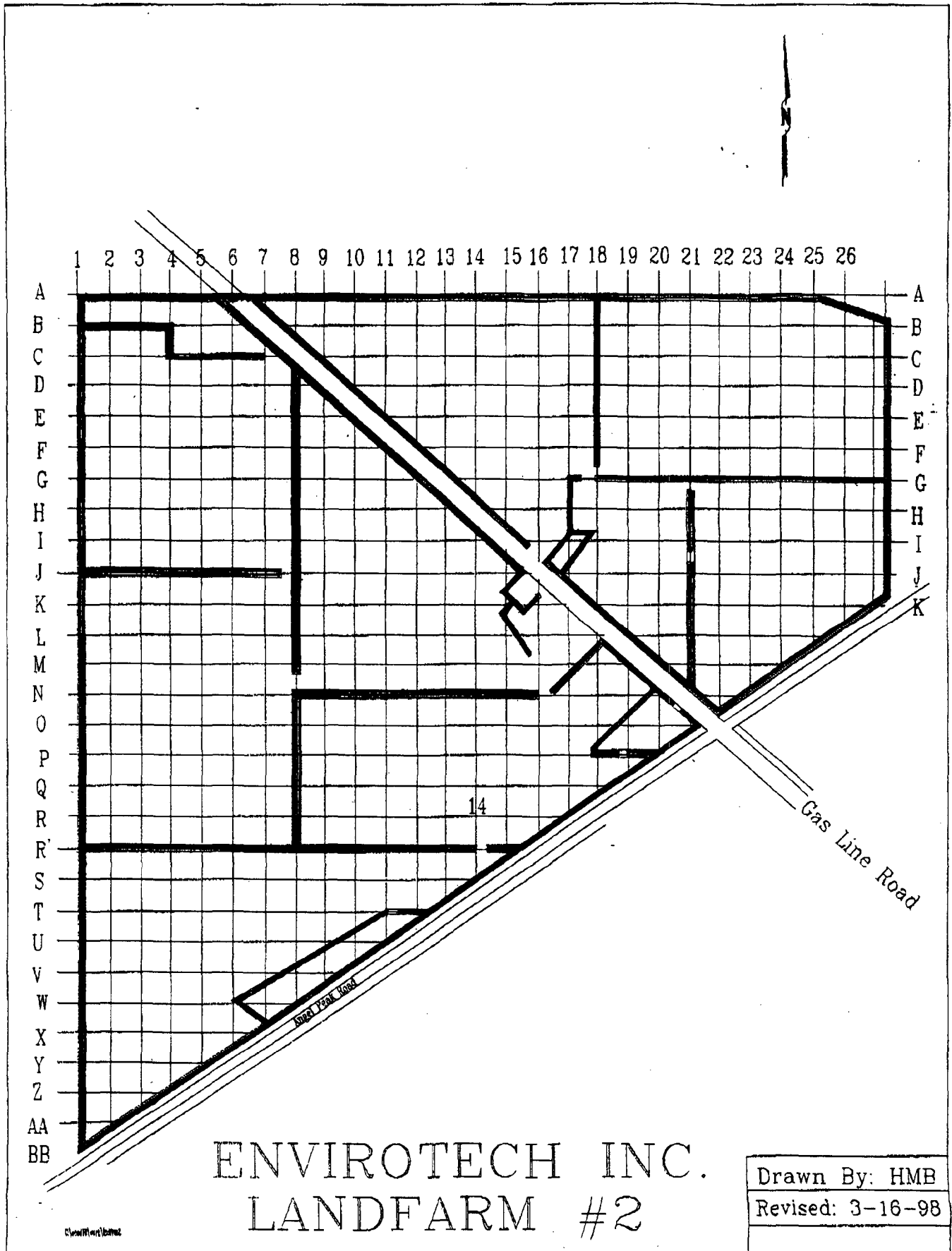
comments... Here are the maps you requested  
for the addition made to Landform 2. Included  
is a Aerial view of Landform 2, then three  
additional maps of each individual unit. If you  
have any additional question please call Claudia or  
T. I will be sending you three hard copies  
of each map in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

from the desk of... Christine Weston

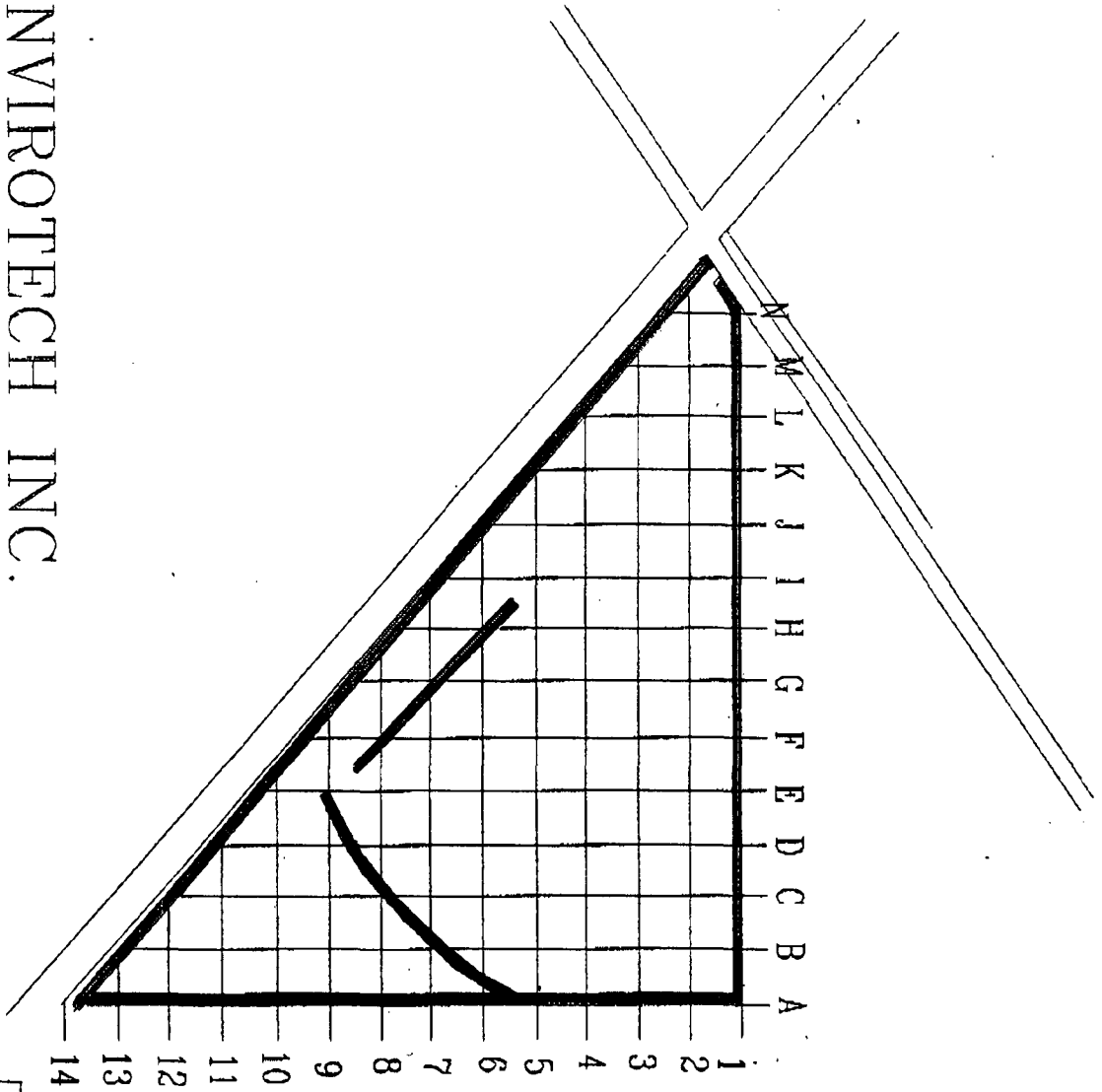
envirotech inc.  
5796 us highway 64  
farmington, n. m. 87401  
505.632.0615  
505.632.1865 fax







ENVIROTECH INC.  
LANDFARM #2  
UNIT #4

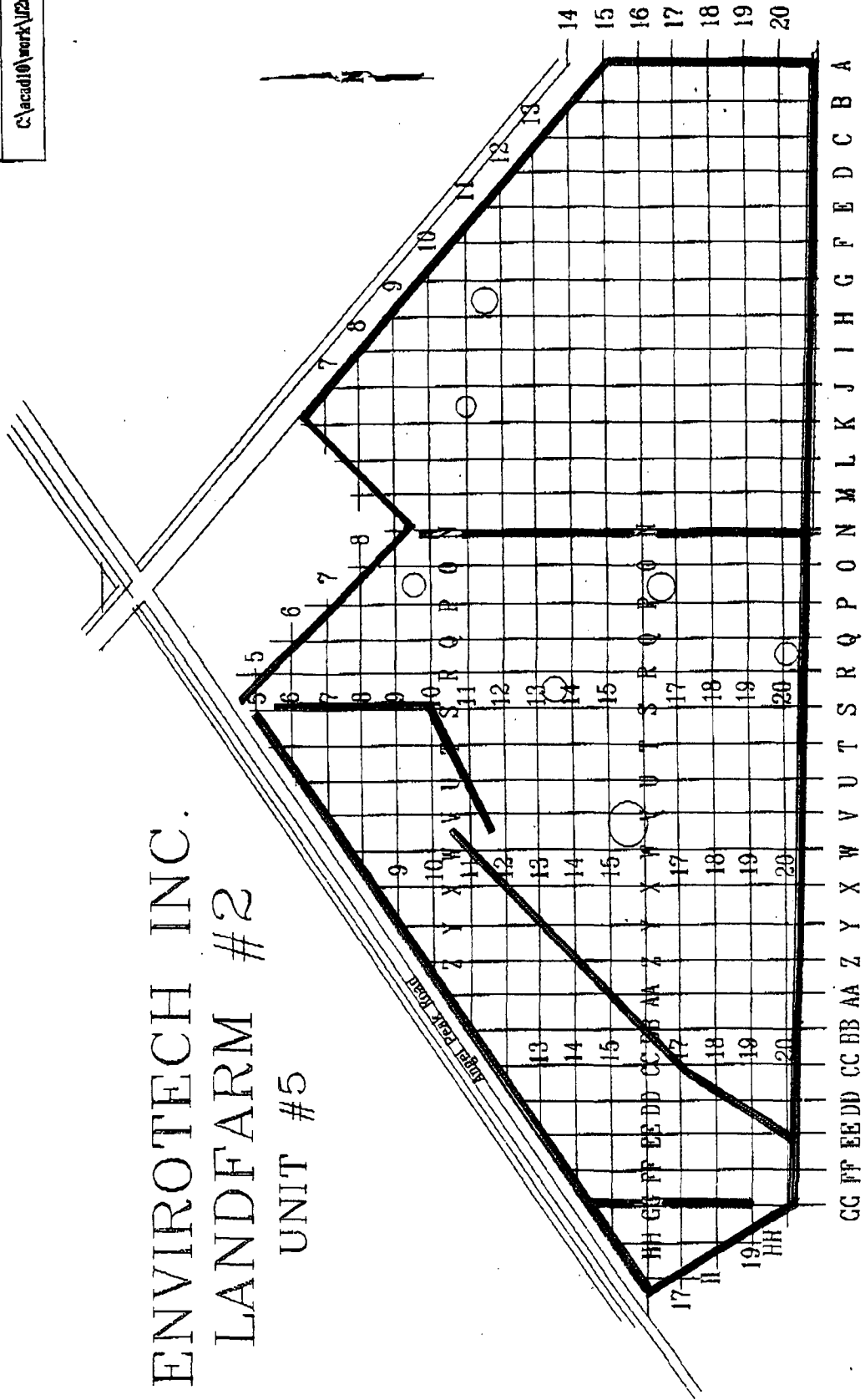


Unit #4

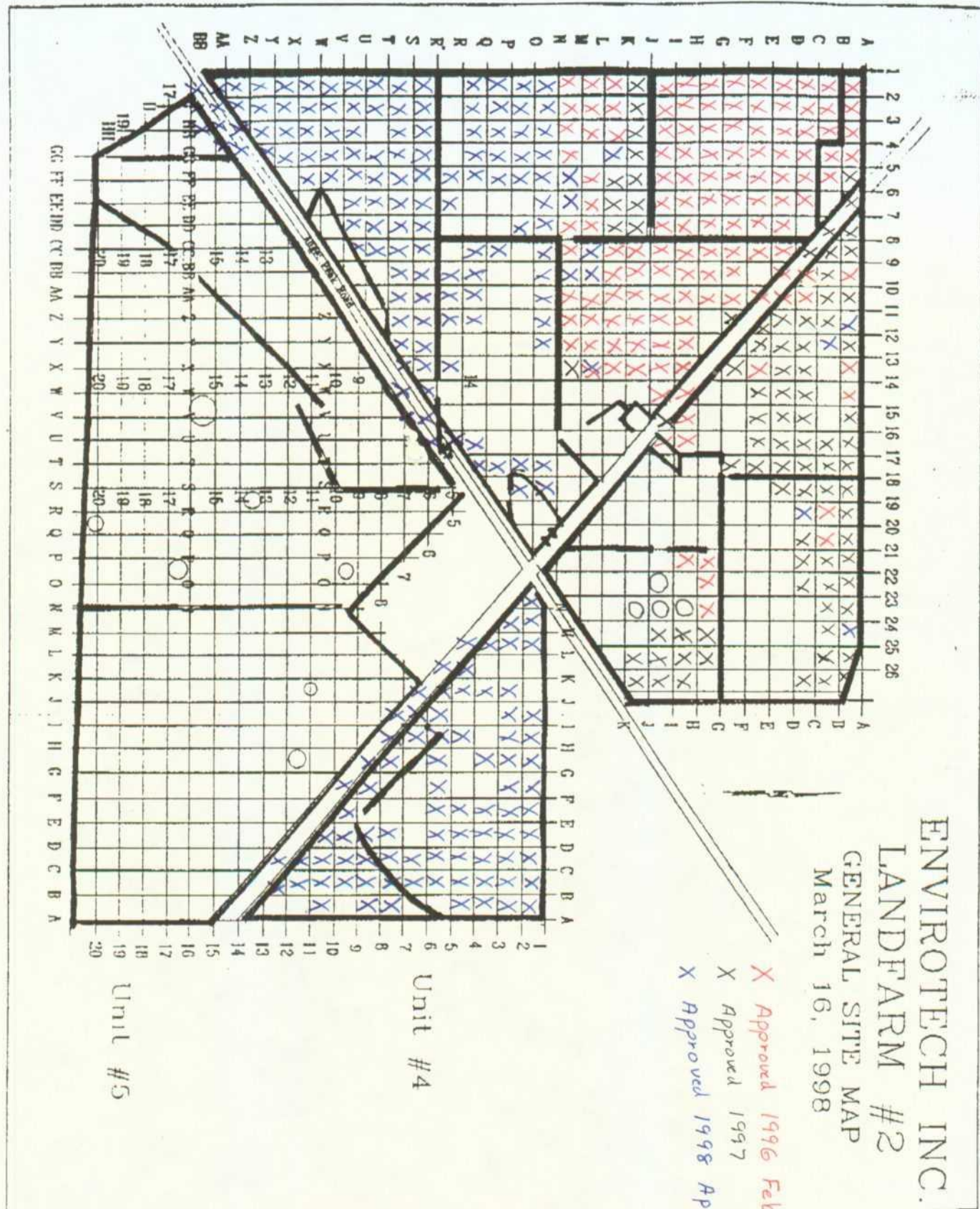
Drawn By: HMB
Revised: 3-16-98
C:\ecad\10\work\172unit4

Drawn By: HMB  
 Revised: 3-16-98  
 C:\acad10\work\102\unit5

# ENVIROTECH INC. LANDFARM #2 UNIT #5



CC FF EE DD CC BB AA Z Y X W V U T S R Q P O N M L K J I H G F E D C B A

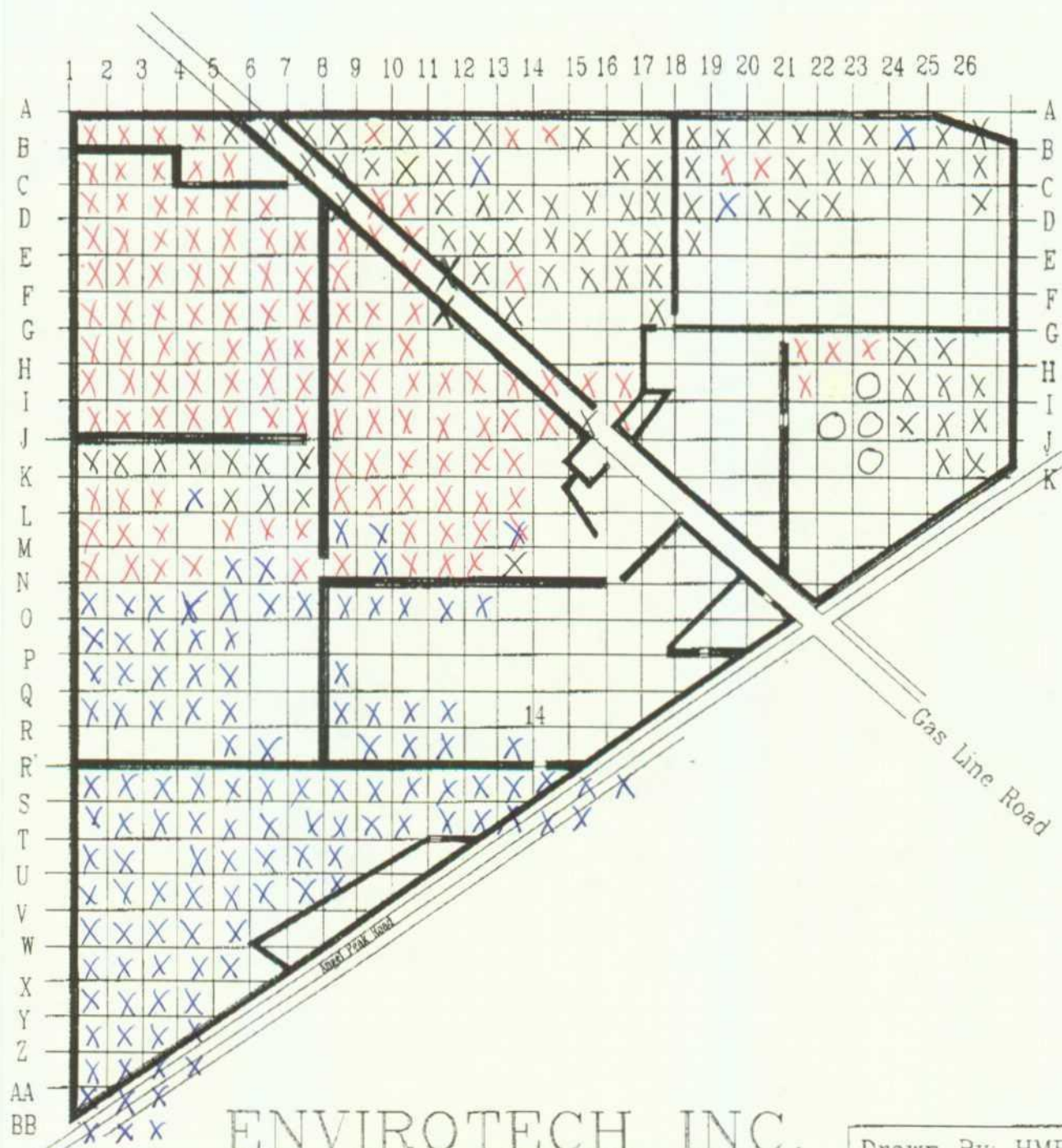




X Approved 1996 February 7

X Approved 1997

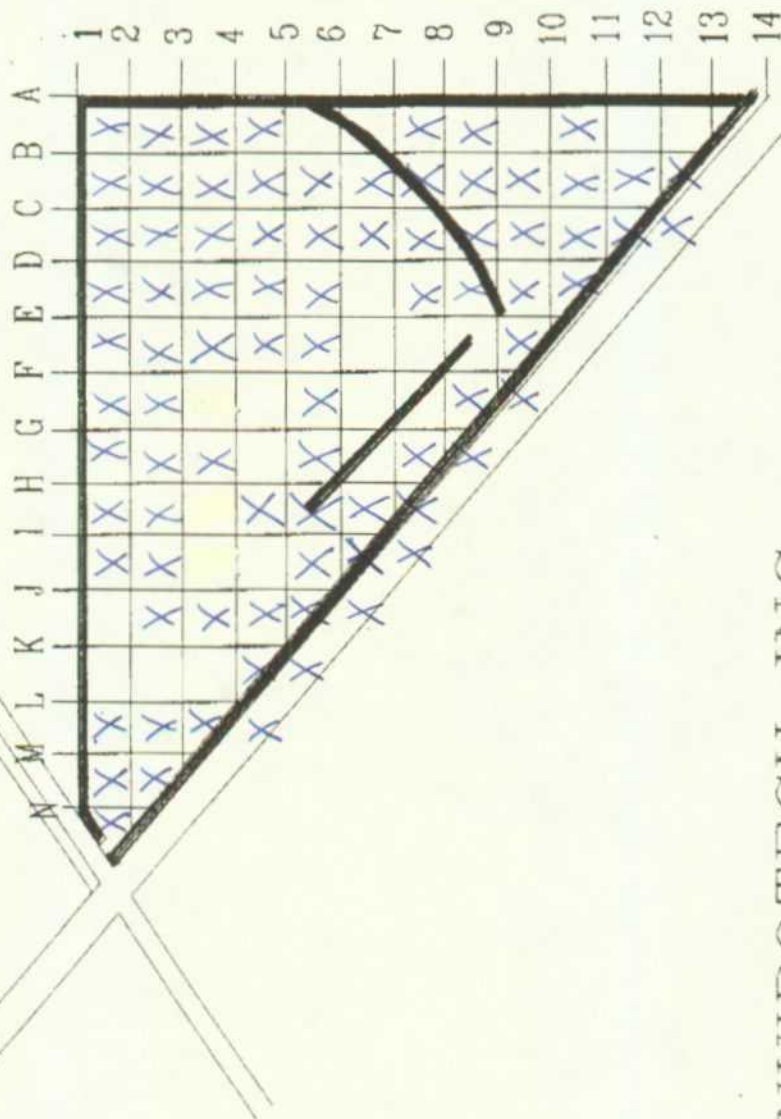
X Approved 1998 April 17



ENVIROTECH INC.  
LANDFARM #2

Drawn By: HMB  
Revised: 3-16-98

ENVIROTECH INC.  
LANDFARM #2  
UNIT #4



Unit #4

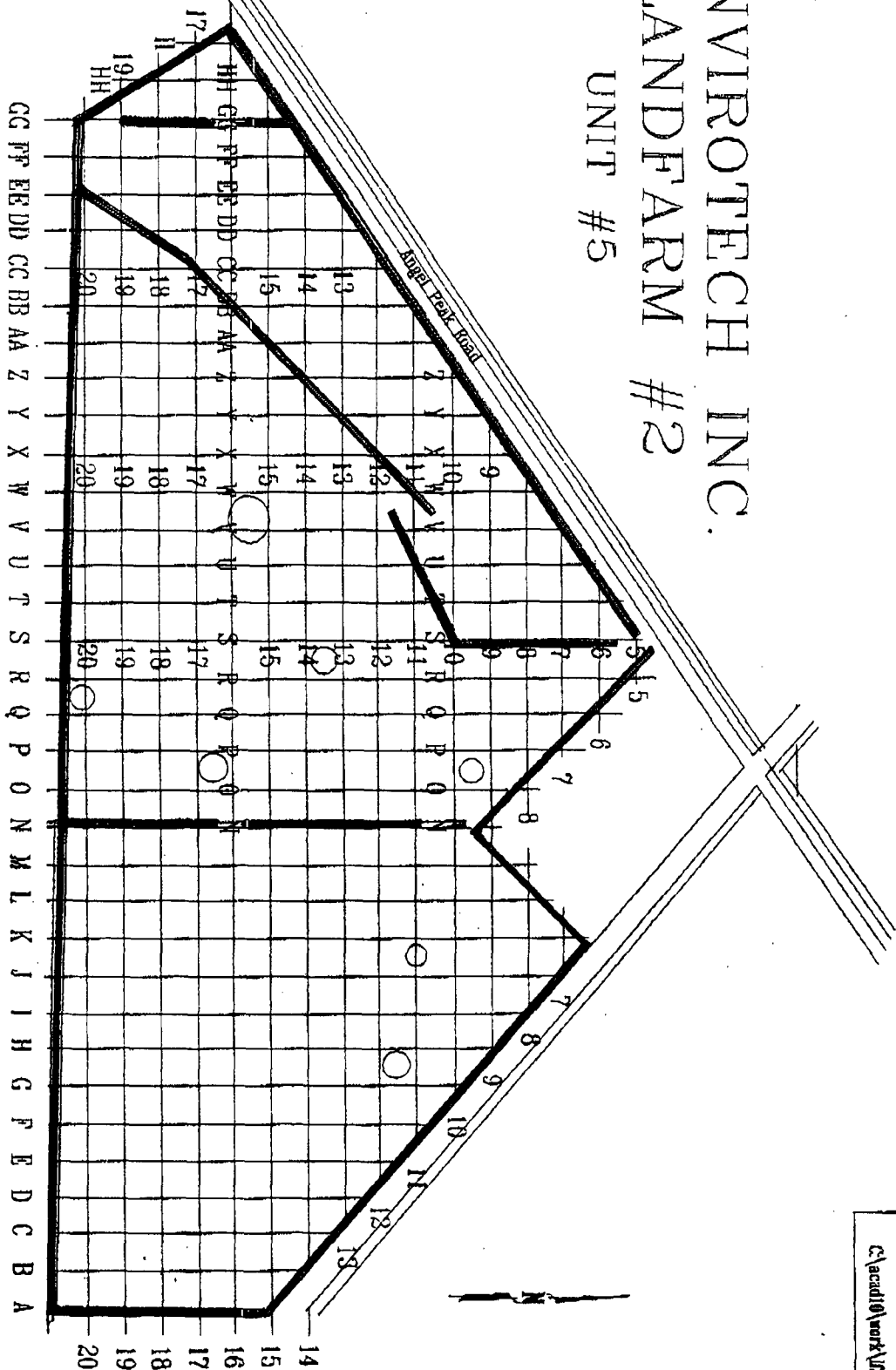
Drawn By: HMB

Revised: 3-16-98

C:\acad10\work\112unit4



# ENVIROTECH INC. LANDFARM #2 UNIT #5

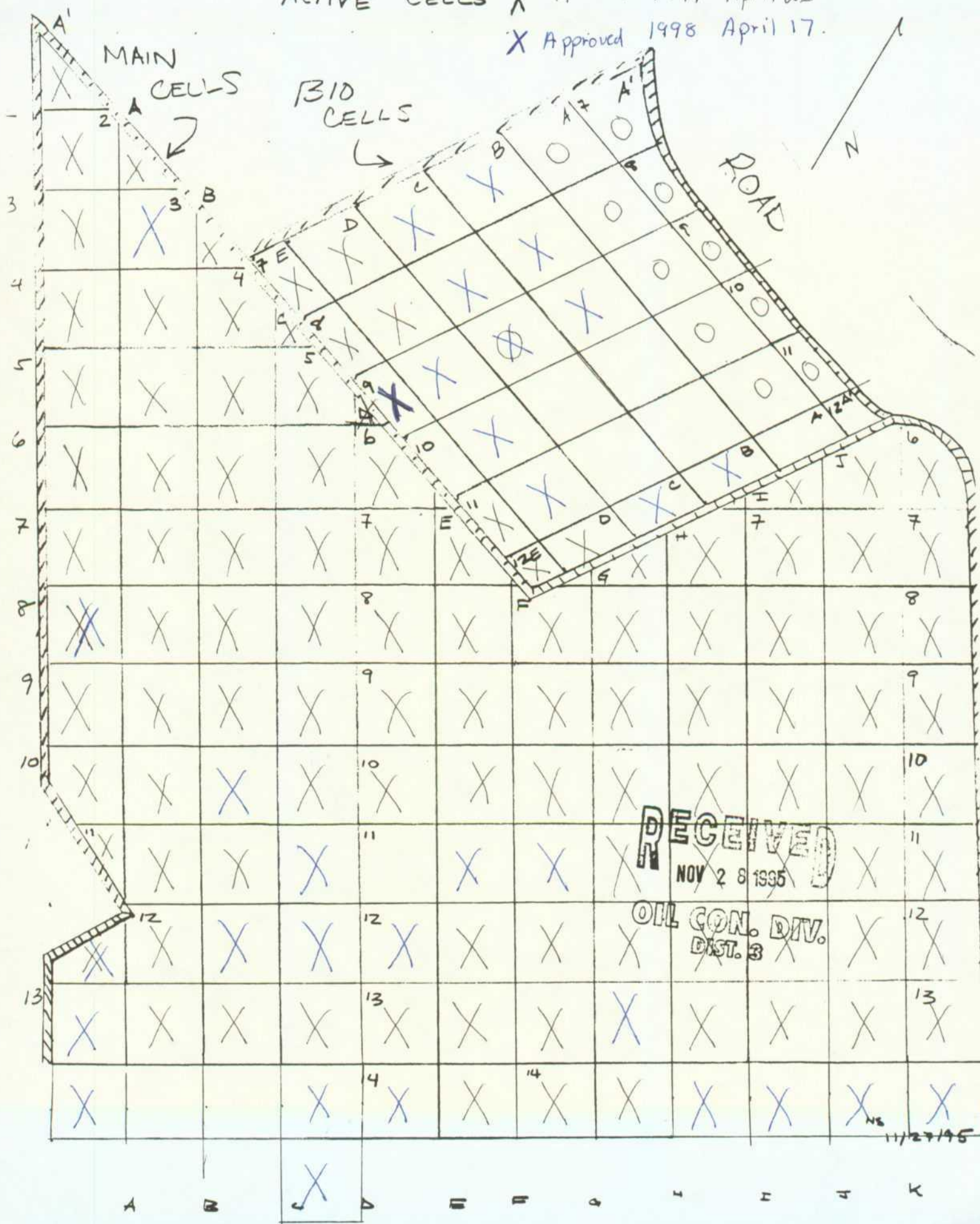


Drawn By: HMB
Revised: 3-16-98
c:\acad10\work\120units

# ENVIROTECH, INC. LANDFARM No. 1

ACTIVE CELLS X Approved 1997 April 23

X Approved 1998 April 17.

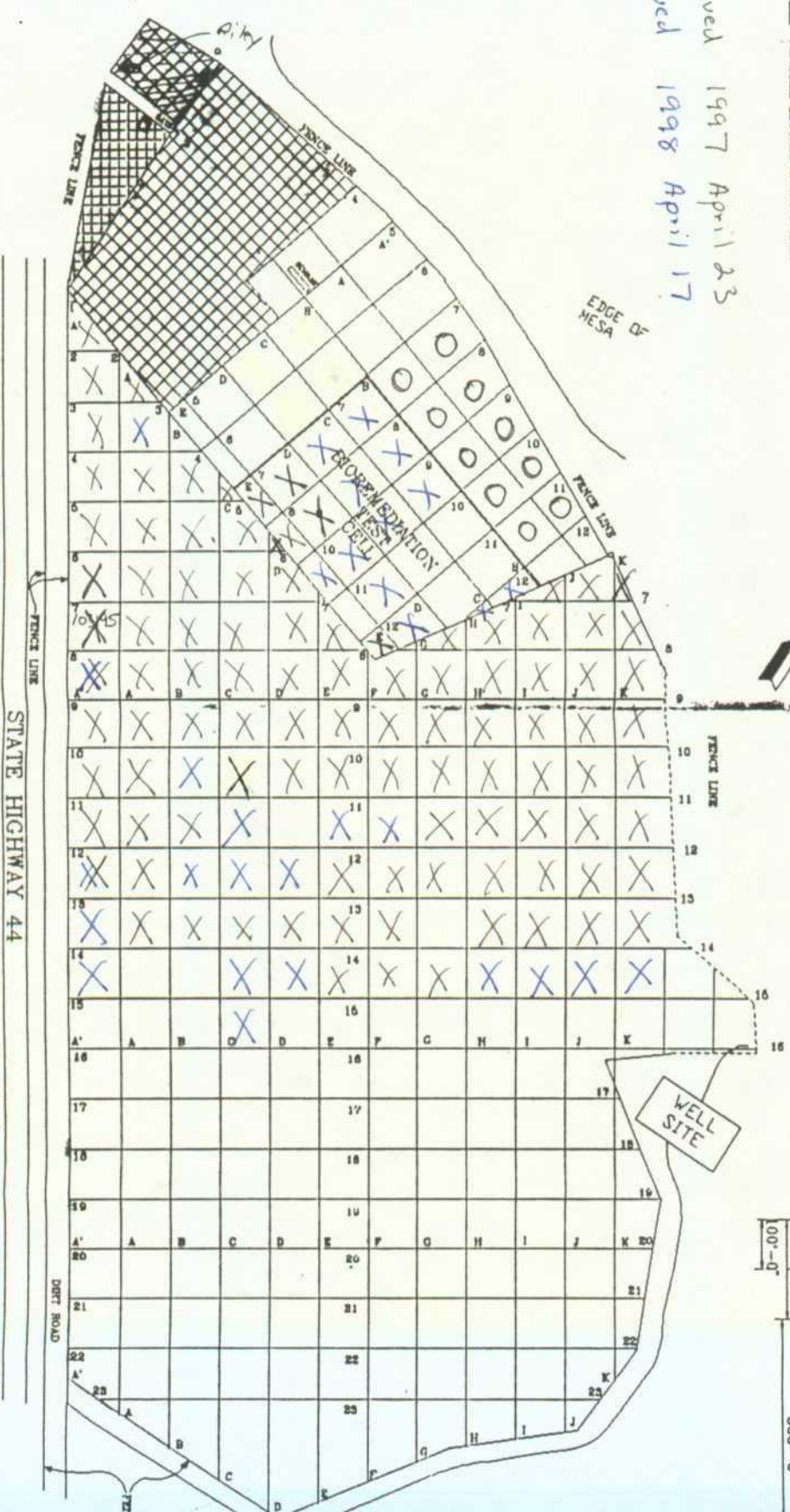


- ☒ HOLDING AREA FOR SOIL TO BE SCREENED.
- ☐ SEPARATE SECURED HOLDING AREA.

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





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

January 13, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-379**

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
and Certified Mail Letters Z-765-962-614(February 7, 1996) and  
P-269-269-395 (June 3, 1996) from the OCD to Envirotech Inc.  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 West, NMPM  
San Juan County, New Mexico**

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) received a telephone call from Ms. Christine Walters of Envirotech Inc. (Envirotech) on January 5, 1997 concerning two certified mail letters Z-765-962-614 (February 7, 1996) and P-269-269-395 (June 3, 1996) from the OCD to Envirotech Inc. This letter will clarify what was discussed during that phone conversation.

According to OCD files recently reviewed, Envirotech submitted analytical results for authorization to deem specific landfarm cells remediated. Envirotech specifically requested discontinued maintenance status (DMS) on each form submitted. The approval letter from the OCD on February 7, 1996 and June 3, 1996 was for the addition of successive lifts. It is the purpose of this letter to clarify the status of these cell. According to the original requests for DMS and the subsequent conversation with Ms. Christine Walters concerning the cells referenced in the two letters the OCD shall clarify the original approval to include DMS.

Thus the cells listed below are hearby approved for discontinued maintenance status :

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13

Mr. Young  
January 13, 1998  
Page 2

Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

AND:


Cell A-1	Cell C-6	Cell E-7	Cell G-8	Cell K-11
Cell A-2	Cell C-9	Cell E-8	Cell H-3	Cell K-12
Cell A-3	Cell C-10	Cell E-10	Cell H-13	Cell L-5
Cell A-4	Cell D-1	Cell E-13	Cell H-14	Cell L-6
Cell B-1	Cell D-2	Cell F-4	Cell H-15	Cell L-7
Cell B-2	Cell D-3	Cell F-5	Cell H-16	Cell L-10
Cell B-3	Cell D-4	Cell F-6	Cell I-4	Cell L-11
Cell B-4	Cell D-5	Cell F-7	Cell I-5	Cell L-12
Cell B-5	Cell D-6	Cell F-8	Cell I-6	Cell M-1
Cell B-19	Cell D-7	Cell F-9	Cell I-7	Cell M-7
Cell B-20	Cell D-8	Cell G-1	Cell I-14	Cell M-8
Cell C-1	Cell D-9	Cell G-2	Cell I-16	Cell M-10
Cell C-2	Cell D-10	Cell G-3	Cell J-10	Cell M-11
Cell C-3	Cell E-4	Cell G-4	Cell J-11	Cell M-12
Cell C-4	Cell E-5	Cell G-5	Cell K-9	
Cell C-5	Cell E-6	Cell G-6	Cell K-10	
		Cell G-7		

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, state and/or local regulations.

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

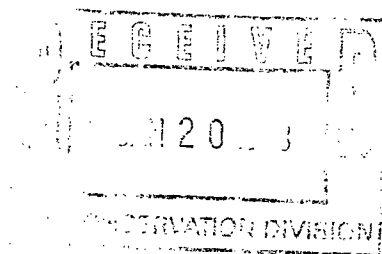
Sincerely,

  
Martyne J. Kieling  
Environmental Geologist

xc: OCD Aztec Office

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



January 13, 1998

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

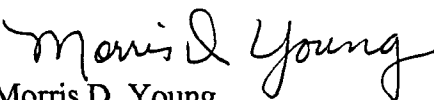
Re: Closure Cost Details

Dear Ms. Kieling,

Mr. Denny Foust of the NMOCD Aztec office has requested that we submit details for how we calculated the estimated closure costs for our proposed 51-acre landfarm. Attached you will find a breakdown for the estimated closure costs.

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

Sincerely yours,  
Envirotech, Inc

  
Morris D. Young  
President

Cc: Denny Foust, NMOCD Aztec Office

Cost Detail Breakdown for estimate to reclaim a 51 acre landfarm. 1/9/98  
Envirotech, Inc.

Assume that we do our own labor.

Task	units	cost per unit	units used per year	cost per year
Disking @ *6.8 acres per hour, \$20 per hour	disking	\$150.00	26	\$3,900.00
8015 Analysis	sample	\$85.00	30	\$2,550.00
418.1 Analysis	sample	\$49.50	30	\$1,485.00
Sampler @ 1-8015/418.1 sample collected per hour	hour	\$55.50	30	\$1,665.00
Fence removal labor crew	hour	\$20.00	300	\$6,000.00
Berm removal with dozer	hour	\$150.00	26	\$3,900.00
Seed, BLM #2 seed mix @ 11 lbs per acre	pound	\$2.15	561	\$1,206.15
Seed planting after final disking (seed drill @ 5.1 acres per hr)	hour	\$80.00	10	\$800.00
TOTAL				\$21,506.15

Assume that we contract labor.

Task	units	cost per unit	units used per year	cost per year
Disking @ *6.8 acres per hour, \$40 per hour	disking	\$300.00	26	\$7,800.00
8015 Analysis	sample	\$85.00	30	\$2,550.00
418.1 Analysis	sample	\$49.50	30	\$1,485.00
Sampler @ 1-8015/418.1 sample collected per hour	hour	\$55.50	30	\$1,665.00
Fence removal labor crew	hour	\$20.00	300	\$6,000.00
Berm removal with dozer	hour	\$150.00	26	\$3,900.00
Seed, BLM #2 seed mix @ 11 lbs per acre	pound	\$2.15	561	\$1,206.15
Seed planting after final disking (seed drill @ 5.1 acres per hr)	hour	\$80.00	10	\$800.00
TOTAL				\$25,406.15

\* 14' wide disk being pulled by John Deere 8640 running at 4.0 miles per hour will disk 6.8 acres per hour.





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

January 13, 1998

CERTIFIED MAIL

RETURN RECEIPT NO. P-326-936-379

RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
and Certified Mail Letters Z-765-962-614 (February 7, 1996) and  
P-269-269-395 (June 3, 1996) from the OCD to Envirotech Inc.  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 West, NMPM  
San Juan County, New Mexico

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

RECEIVED  
JAN 15 1998  
OIL CON. DIV.  
DIST. 3

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) received a telephone call from Ms. Christine Walters of Envirotech Inc. (Envirotech) on January 5, 1997 concerning two certified mail letters Z-765-962-614 (February 7, 1996) and P-269-269-395 (June 3, 1996) from the OCD to Envirotech Inc. This letter will clarify what was discussed during that phone conversation.

According to OCD files recently reviewed, Envirotech submitted analytical results for authorization to deem specific landfarm cells remediated. Envirotech specifically requested discontinued maintenance status (DMS) on each form submitted. The approval letter from the OCD on February 7, 1996 and June 3, 1996 was for the addition of successive lifts. It is the purpose of this letter to clarify the status of these cell. According to the original requests for DMS and the subsequent conversation with Ms. Christine Walters concerning the cells referenced in the two letters the OCD shall clarify the original approval to include DMS.

Thus the cells listed below are hereby approved for discontinued maintenance status :

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13

Mr. Young  
January 13, 1998  
Page 2

Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

AND:

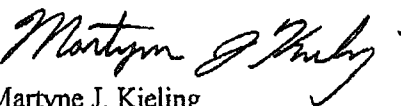
Cell A-1	Cell C-6	Cell E-7	Cell G-8	Cell K-11
Cell A-2	Cell C-9	Cell E-8	Cell H-3	Cell K-12
Cell A-3	Cell C-10	Cell E-10	Cell H-13	Cell L-5
Cell A-4	Cell D-1	Cell E-13	Cell H-14	Cell L-6
Cell B-1	Cell D-2	Cell F-4	Cell H-15	Cell L-7
Cell B-2	Cell D-3	Cell F-5	Cell H-16	Cell L-10
Cell B-3	Cell D-4	Cell F-6	Cell I-4	Cell L-11
Cell B-4	Cell D-5	Cell F-7	Cell I-5	Cell L-12
Cell B-5	Cell D-6	Cell F-8	Cell I-6	Cell M-1
Cell B-19	Cell D-7	Cell F-9	Cell I-7	Cell M-7
Cell B-20	Cell D-8	Cell G-1	Cell I-14	Cell M-8
Cell C-1	Cell D-9	Cell G-2	Cell I-16	Cell M-10
Cell C-2	Cell D-10	Cell G-3	Cell J-10	Cell M-11
Cell C-3	Cell E-4	Cell G-4	Cell J-11	Cell M-12
Cell C-4	Cell E-5	Cell G-5	Cell K-9	
Cell C-5	Cell E-6	Cell G-6	Cell K-10	
		Cell G-7		

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, state and/or local regulations.

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

Sincerely,

  
Martyne J. Kielling  
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

December 18, 1997

CERTIFIED MAIL

RETURN RECEIPT NO. P-326-936-377

Ms. Christine Walters — Dennis' Lab Assistant  
Envirotech Inc.  
5796 U. S. Highway 64-3014  
Farmington, New Mexico 87401

**RE: Cells Approved For Discontinued Maintenance or Additional Lifts Status  
Envirotech LandFarm #1 and #2  
San Juan County, New Mexico**

Dear Ms. Walters:

Enclosed are the lists that you requested. Some cells have been approved for discontinued maintenance status others were approved for additional lifts. I hope this helps.

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

Sincerely,

*Martyne J. Kieling*  
Martyne J. Kieling  
Environmental Geologist

xc with enclosure:  
OCD Aztec Office

RECEIVED  
DEC 22 1997  
OIL CON. DIV.  
DIST. 3



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

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

August 22, 1997

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-326-936-329**

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

**RE: Landfarm #2 Inspection (NM-01-0011)  
Envirotech, Inc.  
NW/4, of Section 6, Township 26 North, Range 10 West, NMPM  
San Juan County, New Mexico**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD), inspected Envirotech, Inc. Landfarm No. 2 (Envirotech #2) located in the NW/4, of Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico on June 10, 1997.

Overall the OCD found Envirotech #2 to have a well maintained landfarm with good security. The OCD inspection and current file review of Envirotech #2 indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Envirotech #2 during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. Envirotech #2 shall provide OCD with a detailed description of how the corrections will be made and a time table of when each of the corrections will be completed. A response is required by Envirotech #2 to these deficiencies by October 24, 1997.

Pursuant to Order R-10411-B the OCD General Rule 711 has been revised. The OCD is currently in the process of re-permitting all surface waste management facilities under the new Rule 711. Envirotech #2 landfarm is included under the new Rule 711. A copy of Order R-10411-B along with the new bond forms were given to you (Morris D. Young) during the OCD inspection on June 10, 1997. An additional set of these forms and the Order is included with this report. A permit application, Form C-137 (attachment 3), shall be filed with the OCD according to the instructions in Attachment 1, Section 14.

Please be advised that the bonding requirements have changed under the new Rule 711. Envirotech #2's current cash bond (bond No 886628) for \$25,000 will need to be replaced. The bonded amount will be based upon the estimated closure costs that the State of New Mexico would incur

Mr. Morris D. Young  
August 22, 1997  
Page 2

if a third party contractor were to remediate the facility (see Rule 711.B.1.i and 711.B.3). Envirotech #2 must have a new bond in place for the approved estimated closure amount prior to receiving a new waste management facility permit.

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

Sincerely,



Martyne J. Kieling  
Environmental Geologist

Attachments

xc: Aztec OCD Office

**ATTACHMENT 1  
INSPECTION REPORT**

June 10, 1997

**ENVIROTECH, INC. LANDFARM #2  
(NW/4, of Section 6, Township 26 North, Range 10 West, NMPM)  
SAN JUAN COUNTY, NEW MEXICO**

1. **Fencing and Signs:** The facility will be fenced and have a sign at the entrance. The sign shall be maintained in good condition and shall be legible from at least fifty (50) feet and contain the following information : a) name of facility, b) location by section, township and range, and c) emergency phone number.

**Facility is secured with fence and locking gate and has a sign at the entrance.**

2. **Berming :** An adequate berm will be constructed and maintained to prevent runoff and runoff for that portion of the facility containing contaminated soils.

**Cell berms are in good shape and well maintained.**

3. **Setbacks:** All new landfarm facilities or modifications to existing landfarm facilities must have a setbacks along the facility boundary and along any pipelines crossing the landfarm. No contaminated soils will be placed within one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within fifty (50) feet of any pipelines crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility will have surface markers identifying the location of the pipelines.

**All future cells constructed must follow the setback requirements.**

4. **Soil Spreading, Disking and Lift Thickness:** All contaminated soils received at the facility will be spread and disked within 72 hours of receipt. Soils will be spread on the surface in six inch lifts or less. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.

**At the time of inspection, soils had been spread and disked accordingly (see picture 3, 4, 5, 6, and 7).**

5. **Free Liquids :** No free liquids or soils with free liquids will be accepted at the facility.

**NA There were no free liquids at the facility.**

6. Trash and Potentially Hazardous Materials: All trash and potentially hazardous materials should be properly disposed of.

Plastic within cells must be removed and properly disposed of. Most cells were free of plastic (see picture 3, 4, 5 and 6).

7. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm so that leaks can be identified.

N/A There are no above ground tanks located at this facility.

8. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

N/A There are no drums located at this facility.

All drums and chemical containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill or ignite.

9. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

N/A There are no saddle tanks located at this facility.

10. Tank Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill or ignite.

N/A There are no tanks, drums or container located at this facility.

11. Housekeeping: All systems designed for spill collection/prevention should be inspected frequently to ensure proper operation and to prevent overtopping or system failure.

NA

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 to the



appropriate OCD District Office.

**At the time of inspection, there were no spills evident at this facility.**

13. Naturally Occurring Radioactive Material (NORM): All generators submitting waste to a New Mexico Oil Conservation Division Permitted Commercial or Centralized 711 Waste Management Facility must include a Naturally Occurring Radioactive Material status declaration. The generator must declare that the waste was tested for Naturally Occurring Radioactive Material (NORM) and does not contain NORM at regulated levels pursuant to 20 NMAC 3.1 Subpart 1403.C and D.

**Under the new 711 Waste Management Facility Permit all waste must be accompanied with a signed NORM declaration from the waste generator.**

14. Application Requirements for Permit Under the New Rule 711: An application, Form C-137, for a permit renewal shall be filed in DUPLICATE with the Santa Fe Office of the Division and ONE COPY with the Hobbs OCD district office. The application shall comply with Division guidelines and shall include:

- (a) The names and addresses of the applicant and all principal officers of the business if different from the applicant;

**Please submit with C-137 application.**

- (b) A plat and topographic map showing the location of the facility in relation to governmental surveys (1/4 1/4 section , township, and range), highways or roads giving access to the facility site, watercourses, water sources, and dwellings within one (1) mile of the site;

**This is already on file with the OCD.**

- (c) The names and addresses of the surface owners of the real property on which the management facility is sited and surface owners of the real property of record within one mile of the site;

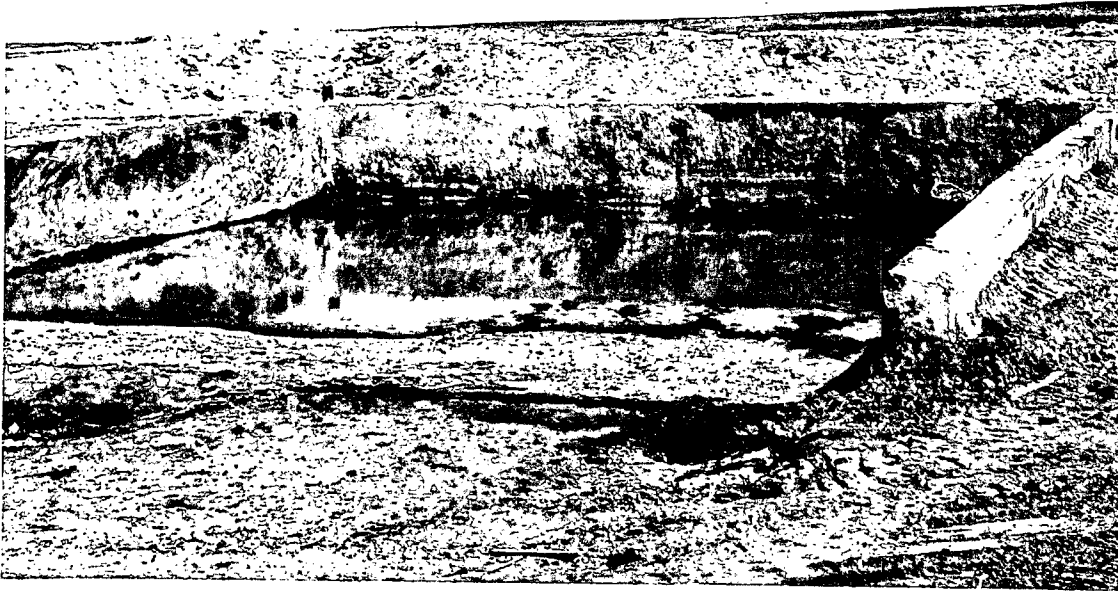
**This is already on file with the OCD.**

- (d) A description of the facility with a diagram indicating location of fences and cattle guards, and detailed construction/installation diagrams of any pits, liner, dikes, piping, sprayers, and tanks on the facility;

**This is already on file with the OCD.**

- (e) A plan for management of approved wastes;  
**Please submit with C-137 application.**
- (f) A contingency plan for reporting a cleanup of spills or releases;  
**Please submit with C-137 application.**
- (g) A routine inspection and maintenance plan to ensure permit compliance;  
**Please submit with C-137 application.**
- (h) A Hydrogen Sulfide (H<sub>2</sub>S) Prevention and Contingency Plan to protect public health;  
**Please submit with C-137 application.**
- (i) A closure Plan including a cost estimate sufficient to close the facility to protect public health and the environment; said estimate to be based upon the use of equipment normally available to a third party contractor;  
**Please submit with C-137 application.**
- (j) Geological/hydrological evidence, including depth to and quality of groundwater beneath the site, demonstrating that disposal of oil field wastes will not adversely impact fresh water;  
**This is already on file with the OCD.**
- (l) Certification by an authorized representative of the applicant that information submitted in the application is true, accurate and complete to the best of the applicant's knowledge.  
**Please submit with C-137 application.**

**ENVIROTECH #2 711 FACILITY INSPECTION (PHOTOS BY OCD)**

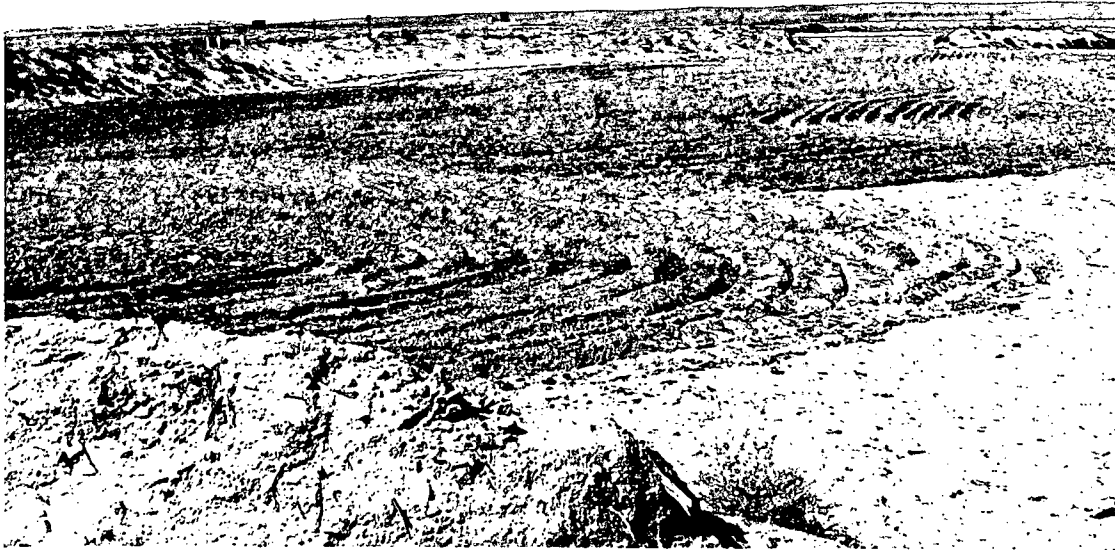


**PHOTO NO. 1      DATE: 06/10/97**



**PHOTO NO. 2      DATE: 06/10/97**

**ENVIROTECH #2 711 FACILITY INSPECTION (PHOTOS BY OCD)**

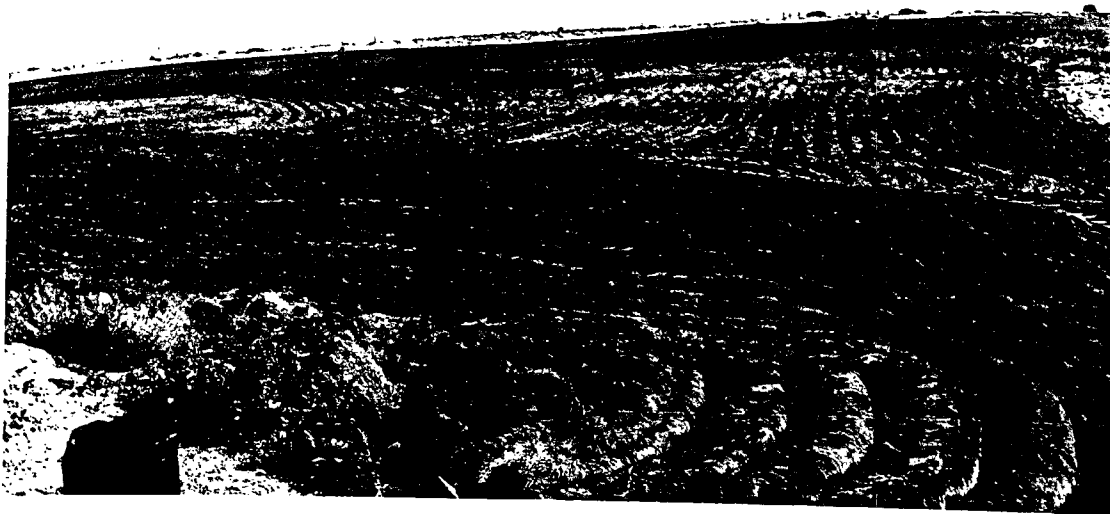


**PHOTO NO. 3      DATE:06/10/97**



**PHOTO NO. 4      DATE:**

**ENVIROTECH #2 711 FACILITY INSPECTION (PHOTOS BY OCD)**

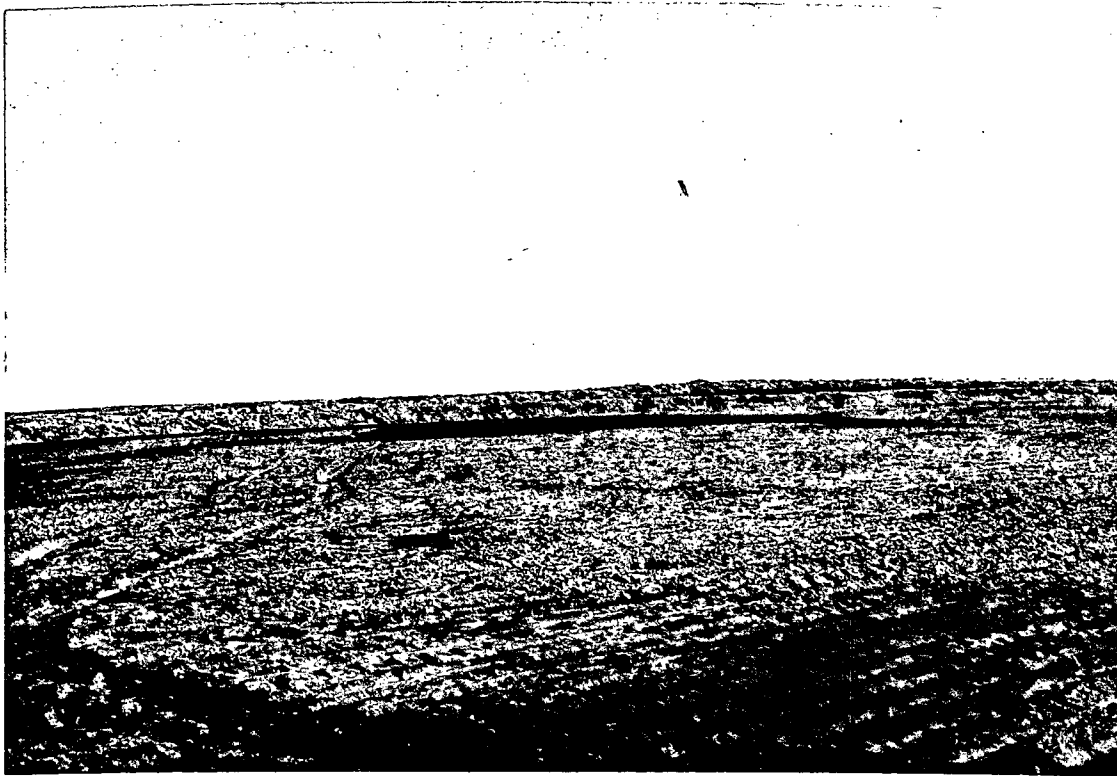


**PHOTO NO. 5 DATE:06/10/97**



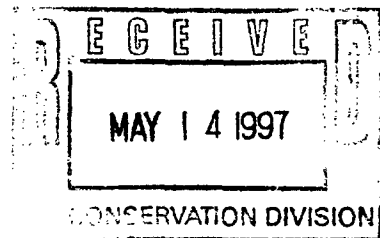
**PHOTO NO. 6 DATE:06/10/97**

**ENVIROTECH #2 711 FACILITY INSPECTION (PHOTOS BY OCD)**



**PHOTO NO. 7      DATE:06/10/97**

**GIANT**  
REFINING CO.



50 Road 4990  
P.O. Box 159  
Bloomfield, New Mexico 87413  
505  
632-8013

May 9, 1997

Roger Anderson  
NMOCD  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Denny Foust  
NMOCD  
1000 Rio Brazos Road  
Aztec, New Mexico 87410

Re: Tank 27 sludge disposal

**RECEIVED**

**MAY 14 1997**

Environmental Bureau  
Oil Conservation Division

Gentlemen:

Giant Refining Company - Bloomfield submits a copy of the vacuum box and sludge distribution from the recent clean-out of Tank #27 at this facility.

If you require additional information, please contact me at (505) 632 8013.

Sincerely:

A handwritten signature in cursive script, appearing to read "Lynn Shelton".

Lynn Shelton  
Environmental Manager  
Giant Refining Company - Bloomfield

TLS/tls

Enclosure



Martynne Kieling

RECEIVED

MAY 15 1997

Environmental Bureau  
Oil Conservation Division

**GIANT REFINING COMPANY - BLOOMFIELD**

**DISTRIBUTION OF VACUUM BOXES AND TANK 27 SLUDGE**

VACUUM BOX NUMBER	MAY, 1997 SHIPPING DATE	DESTINATION	AMOUNT (CUYD)
309-3	4/28/97	CRI	15
325002	4/27/97	CRI	15
614-44	4/27/97	CRI	16
1614	4/25/97	CRI	16
1626	5/6/97	ENVIROTECH	16
V2676	5/1/97	CRI	16
V2638	5/6/97	ENVIROTECH	16
V2673	5/5/97	ENVIROTECH	16
V2555	5/2/97	CRI	16
1627	4/29/97	CRI	16
1612	5/6/97	ENVIROTECH	16
1611	5/5/97	ENVIROTECH	16
1524	5/6/97	ENVIROTECH	16
1642	5/6/97	ENVIROTECH	16
1608	5/6/97	ENVIROTECH	16
V2674	5/5/97	ENVIROTECH	16
V2520	5/2/97	CRI	15
2773	5/5/97	ENVIROTECH	15
3163	5/5/97	ENVIROTECH	16
4921	5/5/97	ENVIROTECH	16
3774	5/5/97	ENVIROTECH	16
1571	4/30/97	CRI (1/3 LOAD)	5
1614	5/6/97	ENVIROTECH	16

RECEIVED  
MAY 14 1997

OIL CON. DIV.  
DIST. 3



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 7, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-285**

Mr. Harlan M. Brown  
Envirotech Inc.  
5796 U.S. Highway 64-3014  
Farmington, New Mexico 87401

**RE:   Envirotech Landfarm #2 Rule 711 permit renewal**  
**Sec. 6, T. 26 N, R. 10 W, NMPM**  
**San Juan County, New Mexico**

Dear Mr. Brown:

This letter is in response to the Envirotech Inc. (Envirotech) letter dated February 17, 1997. According to Oil Conservation Division (OCD) files, Envirotech Landfarm #2 Rule 711 permit for operating a commercial soils remediation facility does expire on September 29, 1997.

The OCD is currently in the process of re-permitting all surface waste management facilities under the new Rule 711. The Envirotech commercial soil remediation facility is included under the new Rule 711. Please refer to the enclosed attachment 1. The present Envirotech Landfarm #2 permit will be automatically extended until the new 711 permit is issued. The re-permitting process will begin with a facility inspection by the OCD, followed by an inspection report and a facility specific list of application requirements that will need to be fulfilled by Envirotech.

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

Sincerely,

Martyne J. Kielling  
Environmental Geologist

Attachments

xc:   Denny Faust, 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

December 18, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-377**

Ms. Christine Walters  
Envirotech Inc.  
5796 U. S. Highway 64-3014  
Farmington, New Mexico 87401

**RE: Cells Approved For Discontinued Maintenance or Additional Lifts Status  
Envirotech LandFarm #1 and #2  
San Juan County, New Mexico**

Dear Ms. Walters:

Enclosed are the lists that you requested. Some cells have been approved for discontinued maintenance status others were approved for additional lifts. I hope this helps.

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

Sincerely,

A handwritten signature in cursive script that reads "Martyne J. Kielling".

Martyne J. Kielling  
Environmental Geologist

xc with enclosure:  
OCD Aztec Office



STATE OF NEW MEXICO  
ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

February 7, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-614**

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13
Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Mr. Young  
February 7, 1996  
Page 2

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 responsibility for compliance with other federal, state and/or local regulations.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Eustice", written over the printed name.

Chris Eustice  
Geologist

cc: 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

June 3, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-269-269-395**

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell A-1	Cell C-6	Cell E-10	Cell H-14	Cell L-10
Cell A-2	Cell C-9	Cell E-13	Cell H-15	Cell L-11
Cell A-3	Cell C-10	Cell F-4	Cell H-16	Cell L-12
Cell A-4	Cell D-1	Cell F-5	Cell I-4	Cell M-1
Cell B-1	Cell D-2	Cell F-6	Cell I-5	Cell M-7
Cell B-2	Cell D-3	Cell F-7	Cell I-6	Cell M-8
Cell B-3	Cell D-4	Cell F-8	Cell I-7	Cell M-10
Cell B-4	Cell D-5	Cell F-9	Cell I-14	Cell M-11
Cell B-5	Cell D-6	Cell G-1	Cell I-16	Cell M-12
Cell B-19	Cell D-7	Cell G-2	Cell J-10	
Cell B-20	Cell D-8	Cell G-3	Cell J-11	
Cell C-1	Cell D-9	Cell G-4	Cell K-9	
Cell C-2	Cell D-10	Cell G-5	Cell K-10	
Cell C-3	Cell E-4	Cell G-6	Cell K-11	
Cell C-4	Cell E-5	Cell G-7	Cell K-12	
Cell C-5	Cell E-6	Cell G-8	Cell L-5	
	Cell E-7	Cell H-3	Cell L-6	
	Cell E-8	Cell H-13	Cell L-7	

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Mr. Young  
June 3, 1996  
Page 2

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 responsibility for compliance with other federal, state and/or local regulations.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Eustice", with a stylized flourish at the end.

Chris Eustice  
Geologist

cc: 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 23, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-278**

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 cells of Land Farm # 2 are hereby approved for discontinued maintenance status or the addition of successive lifts:

Cell A-5	Cell B-6	Cell C-11	Cell D-15
Cell A-6	Cell B-7	Cell C-12	Cell D-16
Cell A-7	Cell B-8	Cell C-14	Cell D-17
Cell A-8	Cell B-9	Cell C-15	Cell D-18
Cell A-10	Cell B-10	Cell C-16	Cell E-11
Cell A-12	Cell B-11	Cell C-17	Cell E-12
Cell A-15	Cell B-16	Cell C-18	Cell E-14
Cell A-16	Cell B-17	Cell C-20	Cell E-15
Cell A-17	Cell B-18	Cell C-21	Cell E-16
Cell A-18	Cell B-21	Cell C-22	Cell E-17
Cell A-19	Cell B-22	Cell C-26	Cell F-11
Cell A-20	Cell B-23	Cell D-8	Cell F-13
Cell A-21	Cell B-24	Cell D-11	Cell F-17
Cell A-22	Cell B-25	Cell D-12	Cell G-24
Cell A-23	Cell B-26	Cell D-13	Cell G-25
Cell A-25	Cell C-7	Cell D-14	Cell H-24
Cell A-26	Cell C-8	Cell D-15	Cell H-25

Mr. Young  
April 23, 1997  
Page 2 of 2

Cell I-15	Cell J-1	Cell J-5	Cell J-26
Cell I-24	Cell J-2	Cell J-6	Cell K-5
Cell I-25	Cell J-3	Cell J-7	Cell K-6
Cell I-26	Cell J-4	Cell J-25	Cell K-7
			Cell M-13

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 4 cells of Land Farm # 2 were **not approved** due to excessive holding time prior to analysis:

Cell H-23	Cell I-22	Cell I-23	Cell J-23
-----------	-----------	-----------	-----------

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





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.

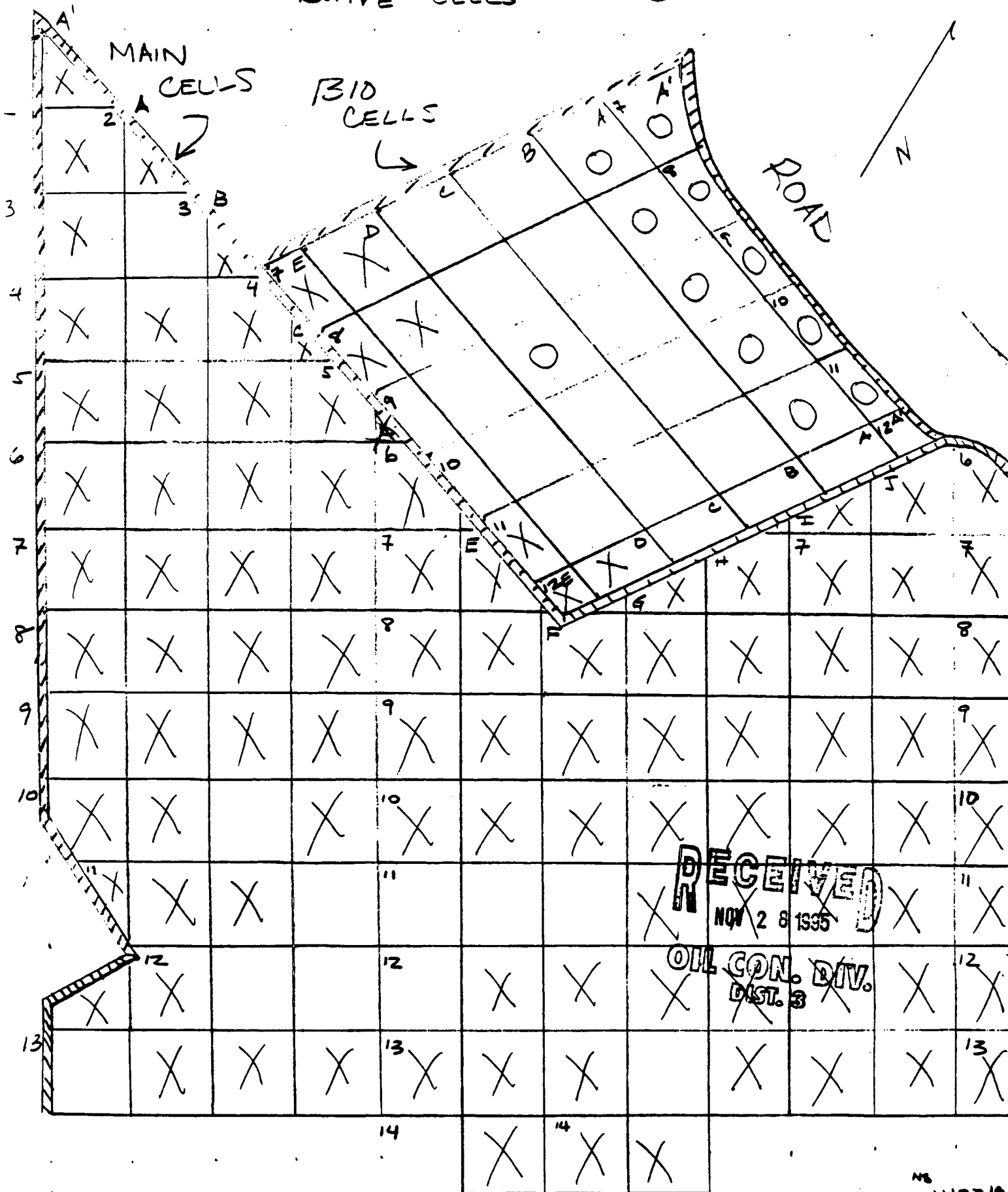
Sincerely,



Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office

# ACTIVE CELLS



11/27/46

A B C D E F G H I J K

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

December 18, 1997

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

Re: Envirotech Landfarm #2 Permit Deficiencies

Dear Ms. Kieling,

This correspondence is in reference to the August 22, 1997 letter from yourself to Envirotech. The intent of the letter was to outline "permit deficiencies" found during your June 1997 inspection of our landfarm #2.

This correspondence answers the required items in the referenced letter:

Item 6: Plastic is routinely removed from the landfarm. Plastic that is recovered is shipped to Waste Management - San Juan Regional Landfill as a commercial waste.

Item 13: We acknowledge the NORM requirements that will be addressed under our new 711 Waste Management Facility Permit.

Item 14a,e-i,l This information is submitted with the attached C-137 application.

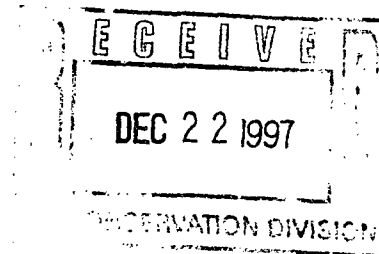
At this time, we estimate that it would take \$21,506.15 for us to finalize reclamation activities for the 51 active acres. If we had to go to a third party, we estimate the costs to be \$25,406.15. At this time, we believe that our current bond is sufficient to cover these costs.

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

Sincerely yours,  
Envirotech, Inc

*Morris D. Young*  
Morris D. Young  
President

cc: Denny Foust, Aztec NMOCD Office





District I - (505) 393-6161  
P. O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

Form C-137  
Originated 8/8/95  
Revised 6/25/97

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to appropriate  
District Office

APPLICATION FOR WASTE MANAGEMENT FACILITY  
(Refer to the OCD Guidelines for assistance in completing the application)

☒ Commercial

☐ Centralized

1. Type: ☐ Evaporation ☐ Injection ☐ Other \_\_\_\_\_

☒ Solids/Landfarm ☐ Treating Plant

2. Operator: Young Environmental Services Inc., dba Envirotech Inc.

Address: 5796 U.S. Highway 64, Farmington, NM 87401

Contact Person: Morris D. Young Phone: (505) 632-0615

3. Location: 4 /4 Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_

Submit large scale topographic map showing exact location \*already on file

4. Is this a modification of an existing facility? ☒ Yes ☐ No

5. Attach the name and address of the landowner of the facility site and landowners of record within one mile of the site.  
On File

6. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.  
Attached

7. Attach designs prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations systems, enhanced evaporation (spray) systems, waste treating systems, security systems, and landfarm facilities.  
On File

8. Attach a contingency plan for reporting and clean-up for spills or releases.  
Attached

9. Attach a routine inspection and maintenance plan to ensure permit compliance.  
Attached

10. Attach a closure plan.  
Attached

11. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact groundwater. Depth to and quality of ground water must be included.  
On File

NA 12. Attach proof that the notice requirements of OCD Rule 711 have been met.  
Attached

13. Attach a contingency plan in the event of a release of H<sub>2</sub>S.  
-A plan for management of approved wastes

14. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and orders.

15. CERTIFICATION

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

Name: MORRIS D. YOUNG Title: PRESIDENT

Signature: Morris D. Young Date: DECEMBER 19, 1997

### **DESCRIPTION OF THE FACILITY**

At this time Envirotech is reducing the size of the active portion of the landfarm to approximately 51 acres to reduce the amount of the bond required for reclamation of an active landfarm. The remaining 316 acres that were within the original landfarm and expansion permits will be considered inactive by Envirotech and will fall under the guidelines of the attached Post Closure Care Plan. An increased bond will not be applicable to these areas and they will still be disked on a twice-monthly basis until closed. The blending area is within the inactive area, however, it will still be used occasionally to stabilize sludge prior to acceptance into Landfarm #2.

An approximate description of the active area within Landfarm #2 is as follows:

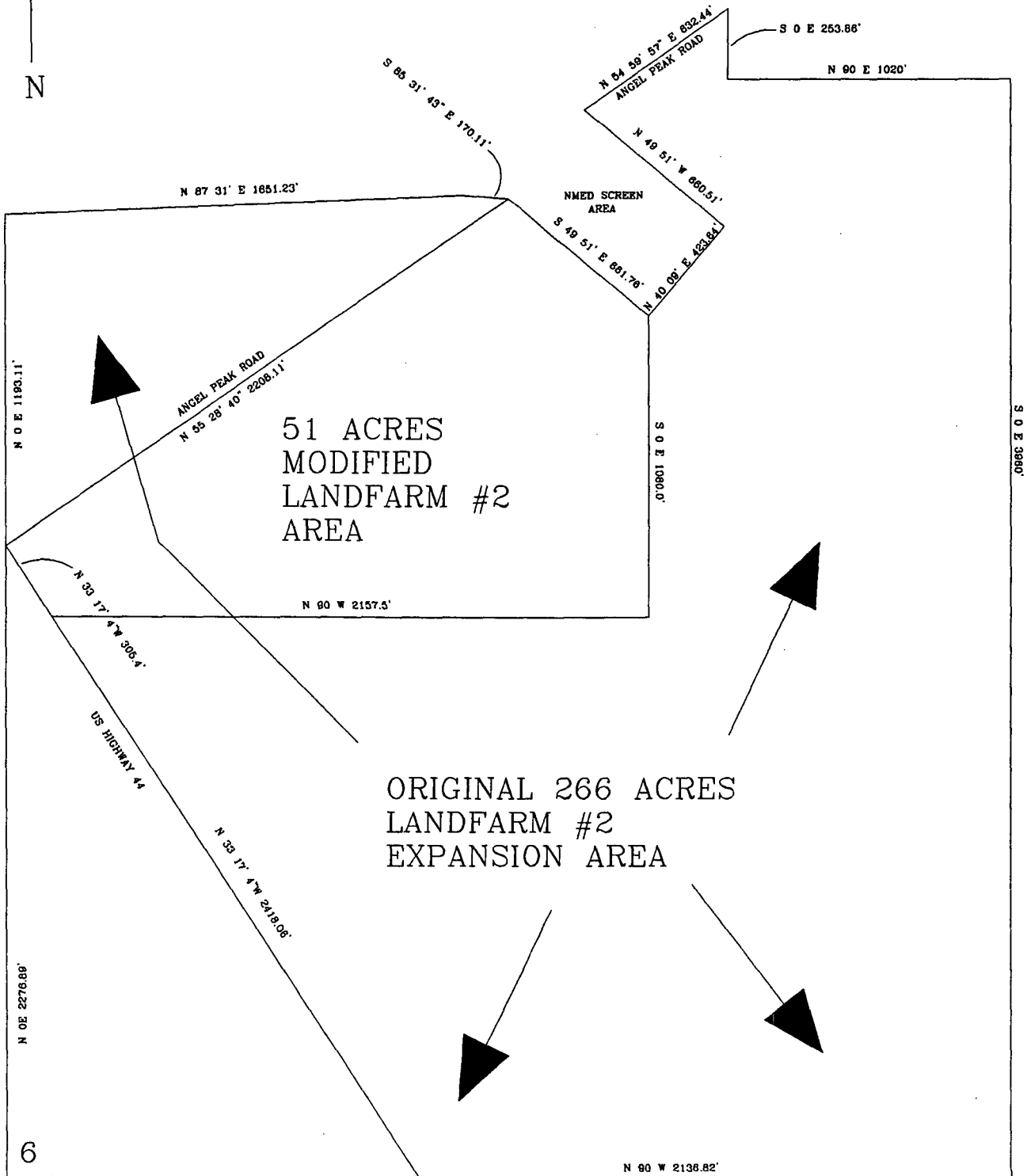
A tract of land containing approximately 51 acres located in Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SOUTHWEST CORNER OF SAID SECTION 6 AND RUNNING THENCE NORTH 2276.89 FEET ALONG THE WEST LINE OF SAID SECTION 6 TO THE BEGINNING CORNER OF THE PROPERTY BOUNDARY THENCE NORTH  $55^{\circ} 28'40''$  EAST 2208.11 FEET TO THE WESTERN CORNER OF THE NMED SCREEN AREA, THENCE SOUTH  $49^{\circ} 51'$  EAST 661.76 FEET TO THE SOUTHERN CORNER OF THE NMED SCREEN AREA, THENCE SOUTH 1080.0 FEET, THENCE WEST 2157.5', THENCE NORTH  $33^{\circ} 17' 4''$  WEST 305.4 FEET MORE OR LESS TO THE BEGINNING CORNER OF THE PROPERTY.

PLAT TO ACCOMPANY  
APPROXIMATE LEGAL  
DESCRIPTION FOR MODIFIED  
LANDFARM #2 AREA FROM  
266 ACRES TO 51 ACRES  
EFFECTIVE DECEMBER 15, 1997



N



1 6  
12 7

ENVIROTECH SOIL REMEDIATION FACILITY, HILLTOP, NM

**CONTINGENCY PLAN FOR REPORTING AND CLEAN-UP FOR SPILLS OR RELEASES.**

**REPORTING:**

Spills or releases will be reported to NMOCD Aztec Office via phone, fax, or letter within 24 hours of confirmation of the spill or release.

**CLEAN-UP:**

Spills or releases will be cleaned up using any remedial action methodologies available at the time of the spill or release. Clean-up will continue until regulatory levels of contamination are no longer exceeded.

## **ROUTINE INSPECTION AND MAINTENANCE PLAN TO ENSURE PERMIT COMPLIANCE**

### **INSPECTION:**

A member of management will visit the landfarm on a monthly basis for the purpose of inspection. Inspection will be for the purpose of auditing the landfarm for compliance with permit requirements.

### **MAINTENANCE:**

Maintenance of the landfarm will consist of twice monthly disking supplemented with occasional removal of plastic, rocks, trash, and other debris.

## CLOSURE PLAN

### CLOSURE PLAN:

Landfarm soils that are being remediated will be occasionally sampled to assess the residual level of contamination. When the concentration of residual contamination in the active cells falls below 100 ppm TPH, 10 ppm benzene, and 50 ppm BTEX, Envirotech proposes the following closure activities:

- 1) Submit all clean closure sampling results to OCD that have not been submitted.
- 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.

Sampling will be based on :

40 acres of similar wastes sampled at the rate of one sample per five acres.

11 acres of dissimilar wastes sampled at the rate of one sample per every half-acre.

**CONTINGENCY PLAN IN THE EVENT OF A RELEASE OF H<sub>2</sub>S**

H<sub>2</sub>S should not be generated at the site. As a result, a contingency plan is not appropriate to this landfarm.



### **OTHER INFORMATION**

#### **PLAN FOR MANAGEMENT OF APPROVED WASTES:**

Approved wastes are subject to the following handling practices:

- 1) The load of waste is hauled to the landfarm via a semi-tractor or body-load style dump truck
- 2) The load of waste is then dumped into a cell that is designated by the Landfarm Manager.
- 3) A record of the load is created.
- 4) The load of waste is spread to approximately 6"- 9" thick within 24 hours.
- 5) The waste is disked at least twice monthly until closure is attained.

# ENVIROTECH INC.

**PRAGTICAL SOLUTIONS FOR A BETTER TOMORROW**

December 18, 1997

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

Re: Post Closure Care Plan, Envirotech Landfarm #2

Dear Ms. Kieling,

Envirotech Inc. is submitting this Post Closure Care Plan for our Landfarm #2 facility located approximately 15 miles south of Bloomfield, at Hilltop, New Mexico. This plan applies to areas within the original Landfarm #2 boundaries that are now considered "inactive".

At this time much of our Landfarm #2 facility has been sampled and is near closure. We have approximately 239 inactive cells left to remediate before the land will be returned to its native condition. Each cell is approximately 100' X 100' in size, with the exceptions of boundary cells which are smaller.


Landfarm soils that are being remediated in the inactive areas will be occasionally sampled to assess the residual level of contamination. When the concentration of residual contamination in the inactive cells falls below 100 ppm TPH, 10 ppm benzene, and 50 ppm BTEX, Envirotech proposes the following closure activities:

- 1) Submit all clean closure sampling results to OCD that have not been submitted.
- 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 to cover reclamation costs within the inactive areas 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

  
Morris D. Young  
President

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

copy to E206

RECEIVED

OCT 16 1997

October 14, 1997

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

Dear Ms. Kieling,

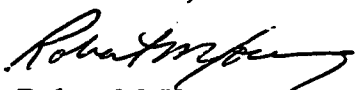
This correspondence is in reference to the pair of August 22, 1997 letters from yourself to Envirotech. The contents of the letters outlined "permit deficiencies" found during your recent inspection of our landfarms. The noted "permit deficiencies" dealt with new and upcoming requirement for renewal of our permits, and not current landfarm management practices. You requested a response for correction of these "permit deficiencies" by October 24, 1997.

Since the "permit deficiencies" are new requirements for permit renewal and we need additional time to develop our business strategies for the upcoming years, we are requesting a 60 day extension to respond to the "permit deficiencies". We request that we are allowed until December 23, 1997 to make the proper response to your office.

At this time we are not anticipating a renewal of the landfarm #1 permit and are planning on continuing with current permit requirements until closure is obtained.

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

Sincerely yours,  
Envirotech, Inc.



Robert M. Young  
Vice President

cc: Aztec OCD office



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-326-936-278**

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

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 cells of Land Farm # 2 are hereby **approved** for discontinued maintenance status or the addition of successive lifts:

Cell A-5	Cell B-6	Cell C-11	Cell D-15
Cell A-6	Cell B-7	Cell C-12	Cell D-16
Cell A-7	Cell B-8	Cell C-14	Cell D-17
Cell A-8	Cell B-9	Cell C-15	Cell D-18
Cell A-10	Cell B-10	Cell C-16	Cell E-11
Cell A-12	Cell B-11	Cell C-17	Cell E-12
Cell A-15	Cell B-16	Cell C-18	Cell E-14
Cell A-16	Cell B-17	Cell C-20	Cell E-15
Cell A-17	Cell B-18	Cell C-21	Cell E-16
Cell A-18	Cell B-21	Cell C-22	Cell E-17
Cell A-19	Cell B-22	Cell C-26	Cell F-11
Cell A-20	Cell B-23	Cell D-8	Cell F-13
Cell A-21	Cell B-24	Cell D-11	Cell F-17
Cell A-22	Cell B-25	Cell D-12	Cell G-24
Cell A-23	Cell B-26	Cell D-13	Cell G-25
Cell A-25	Cell C-7	Cell D-14	Cell H-24
Cell A-26	Cell C-8	Cell D-15	Cell H-25

Mr. Young  
April 23, 1997  
Page 2 of 2

Cell I-15	Cell J-1	Cell J-5	Cell J-26
Cell I-24	Cell J-2	Cell J-6	Cell K-5
Cell I-25	Cell J-3	Cell J-7	Cell K-6
Cell I-26	Cell J-4	Cell J-25	Cell K-7
			Cell M-13

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 4 cells of Land Farm # 2 were **not approved** due to excessive holding time prior to analysis:

Cell H-23	Cell I-22	Cell I-23	Cell J-23
-----------	-----------	-----------	-----------

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.

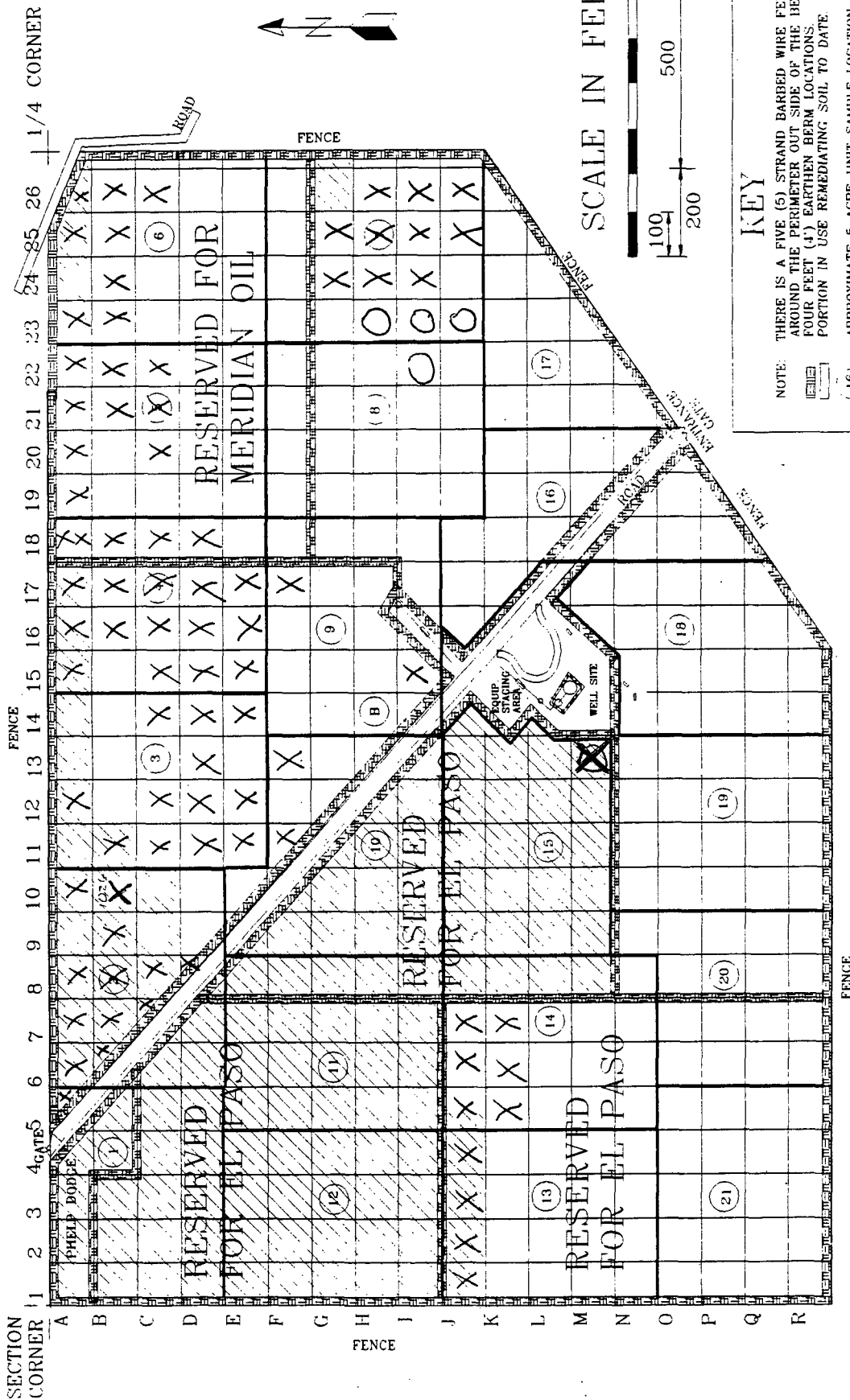
If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,



Martyne J. Kielling  
Environmental Geologist

xc: OCD Aztec Office

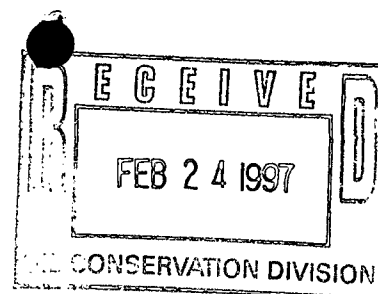


ENVIROTECH INC.  
LAND FARM #2  
SAMPLE LOCATIONS  
FOR CONTROL

NORTHERN 100 ACRES  
OF THE NORTHWEST  
1/4 OF SECTION 6,  
TOWNSHIP 26 NORTH,  
RANGE 10 WEST, NMPM

# SITE PLAN

CHEET: 1	DPAWN: 4/27/93
DRAWN BY: JDD	PRJ MGR: HJ
FILE: 91020.JF2	REV: 4/28/93



February 20, 1997

Roger Anderson, Bureau Chief  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: Review of closure sampling documentation

Dear Mr. Anderson:

We are curious as to the status of closure sampling data submitted to your office in late 1995 and early 1996. Envirotech would like to notify our clients that remediation is complete and that we have received closure for the cells involved from the NMOCD. We recognize that there was a large number of cells submitted for closure and that the review process will be time consuming. It would be helpful if we achieve a few cell closures periodically from the information submitted.

If you have questions or if we can be of service please feel free to contact us at (505)632-0615.

Respectfully,  
**Envirotech Inc.**

A handwritten signature in black ink, appearing to read "Harlan M. Brown".

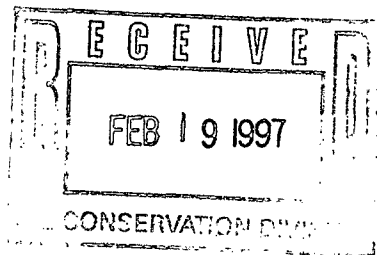
Harlan M. Brown  
Staff Geologist / Hydrogeologist

cc: Denny Foust, NMOCD, 1000 Rio Brazos Road, Aztec, New Mexico 87410



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW



February 17, 1997

Roger Anderson, Bureau Chief  
New Mexico Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

Re: Renewal of Rule 711 Permit, Envirotech's Soil Remediation Facility, Landfarm #2

Dear Mr. Anderson:

Our permit for operating Landfarm #2 will expire on September 29, 1997. We plan to continue operation of this facility and need to renew our permit. Renewal criteria are not detailed in our permit. Would you let us know what steps need to be taken to renew the permit? We would like to have sufficient time to complete any necessary action required by the NMOCD.

Thank you for your assistance in this matter.

Sincerely,  
Envirotech Inc.

A handwritten signature in cursive script, appearing to read "Harlan M. Brown".

Harlan M. Brown  
Staff Geologist / Hydrogeologist

cc: Denny Foust, NMOCD, 1000 Rio Brazos Road, Aztec, New Mexico 87410

MJK 5/6/97

# Affidavit of Publication

No. 14035

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

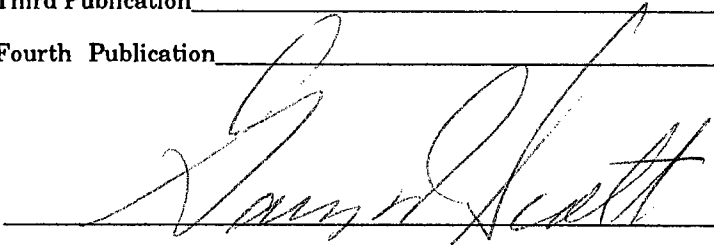
was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:


First Publication August 6, 1992

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

  
Subscribed and sworn to before me this 11th day of August 19 92

  
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

## LEGAL NOTICE

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 Commission Regulations, the following applications to construct and operate a commercial surface

waste disposal facility have 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, 5796 U.S. Highway 64-3014, Farmington, New Mexico 87401, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring proce-

dures to be utilized at the site. ConTeck Environmental Services, Inc., Lawrence N. Hicks, Vice President, 22460 Highway 169, Elk River, Minnesota, 55330, has submitted an application to construct and operate a mobile thermal remediation plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.

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 4:00 p.m., Monday through

Friday. Prior to ruling on any proposed discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION

S-William J. LeMay  
WILLIAM J. LEMAY,  
Director

S E A L

Published in the Artesia Daily Press, Artesia, N.M. August 6, 1992.

Legal 14035

# Affidavit of Publication

No. 14035

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on 11th days of August the same day as follows:

First Publication August 6, 1992

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

Gary D. Scott  
Subscribed and sworn to before me this 11th day of August 19 92

Barbara Ann Boars  
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

## LEGAL NOTICE

### 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 Commission Regulations, the following applications to construct and operate a commercial surface

waste disposal facility have 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, 5796 U.S. Highway 64-3014, Farmington, New Mexico 87401, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring proce-

Copy of Publication

# HC

4x8x1/2"  
**SHEETROCK**  
**\$2.49**

Prices Good Through A

## FRAMING

2x4x8 ELSP/HF  
2x4x10 ELSP/HF  
2x4x12 ELSP/HF  
2x4x14 ELSP/HF  
2x4x16 ELSP/HF

# SK

SKIL TWIST (#2105) ..  
SKIL SUPER TWIST (#2  
SKIL MITER SAW (#3811  
SKIL 7/8" CIRCULAR SA  
SKIL 3/8" PROF. DRILL (#  
SKIL ORBITAL SANDER



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

February 7, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-614**

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13
Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Mr. Young  
February 7, 1996  
Page 2

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 responsibility for compliance with other federal, state and/or local regulations.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Eustice", written over the printed name.

Chris Eustice  
Geologist

cc: OCD Aztec Office



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 627-7131

June 3, 1996

CERTIFIED MAIL  
RETURN RECEIPT NO. P-269-269-395

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell A-1	Cell C-6	Cell E-10	Cell H-14	Cell L-10
Cell A-2	Cell C-9	Cell E-13	Cell H-15	Cell L-11
Cell A-3	Cell C-10	Cell F-4	Cell H-16	Cell L-12
Cell A-4	Cell D-1	Cell F-5	Cell I-4	Cell M-1
Cell B-1	Cell D-2	Cell F-6	Cell I-5	Cell M-7
Cell B-2	Cell D-3	Cell F-7	Cell I-6	Cell M-8
Cell B-3	Cell D-4	Cell F-8	Cell I-7	Cell M-10
Cell B-4	Cell D-5	Cell F-9	Cell I-14	Cell M-11
Cell B-5	Cell D-6	Cell G-1	Cell I-16	Cell M-12
Cell B-19	Cell D-7	Cell G-2	Cell J-10	
Cell B-20	Cell D-8	Cell G-3	Cell J-11	
Cell C-1	Cell D-9	Cell G-4	Cell K-9	
Cell C-2	Cell D-10	Cell G-5	Cell K-10	
Cell C-3	Cell E-4	Cell G-6	Cell K-11	
Cell C-4	Cell E-5	Cell G-7	Cell K-12	
Cell C-5	Cell E-6	Cell G-8	Cell L-5	
	Cell E-7	Cell H-3	Cell L-6	
	Cell E-8	Cell H-13	Cell L-7	

RECEIVED  
DEC 22 1997  
OIL CON. DIV.  
DIST. 3

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.




Mr. Young  
June 3, 1996  
Page 2

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 responsibility for compliance with other federal, state and/or local regulations.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

  
Chris Eustice  
Geologist

cc: OCD Aztec Office

AFFIDAVIT OF PUBLICATION

COPY OF PUBLICATI

No. 31600

STATE OF NEW MEXICO,  
County of San Juan:

KIT OWENS being duly  
sworn, says: "That he is the  
ADVERTISING DIRECTOR 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 MONDAY, APRIL 26, 1993

Second Publication \_\_\_\_\_

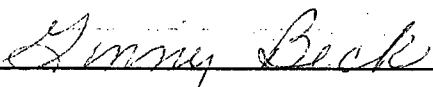
Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

and the cost of publication was \$ 47.94



On May 4, 1993 Kit Owens personally  
appeared before me, whom I know personally to be  
the person who signed the above document.



Notary Public, San Juan County,  
New Mexico

My Comm expires: April 2, 1996

**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 Commission Regulations, the following application to modify a commercial surface waste disposal facility have 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, 5796 U.S. Highway 64 - 3014, Farmington, New Mexico 87401, has submitted an application to modify their previously approved commercial landfarm facility located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 12 inch Lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the south and east an additional 495 acres. The modification also proposes to construct unlined pits to accept drilling mud which would be dried and then moved onto the land farm to be remediated. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.**

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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

**GIVEN** under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 16th day of April, 1993.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**

**WILLIAM J. LEMAY, Director**

Legal No. 31600 published in the Farmington Daily Times, Farmington, New Mexico on Monday, April 26, 1993.

# Affidavit of Publication

STATE OF NEW MEXICO )  
 ) ss.  
COUNTY OF LEA )

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

## Notice Of Publication

and numbered

Court of Lea

County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) day

consecutive weeks, beginning with the issue of

August 7, 1992

and ending with the issue of

August 7, 1992

And that the cost of publishing said notice is the sum of \$36.18

which sum has been (Paid) (Assessed) as Court Costs

*Joyce Clemens*  
Subscribed and sworn to before me this 14th

day of August, 1992

*Mo Jean Serier*  
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1994

## LEGAL NOTICE NOTICE OF PUBLIC ON STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Commission Regulations, the following applications to construct and operate a commercial surface waste disposal facility have 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, 5796 U.S. Highway 64-3014, Farmington, New Mexico 87401, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

ConTeck Environmental Services, Inc., Lawrence N. Hicks, Vice President, 22460 Highway 169, Elk River, Minnesota, 55330, has submitted an application to construct and operate a mobile thermal remediation plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.

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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

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

SEAL  
Published in the Lovington Daily Leader August 7, 1992.

STATE OF NEW MEXICO  
County of Bernalillo

ss

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS & NATURAL  
RESOURCES DEPARTMENT OIL  
CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, PO Box 2088, Santa Fe, New Mexico 87504-2088, telephone (805) 827-5800:

Envirotech Inc., Morris D. Young President, 5788 U.S. Highway 84, 3014, Farmington, New Mexico 87401, has submitted an application to modify their previously approved commercial landfill facility located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility currently remediated RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 12 inch lifts or less and periodically disk them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the south and east an additional 495 acres. The modification also proposes to construct unlined pits to accept drilling mud which would be dried and then moved onto the land farm to be remediated. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

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 thru Friday. Prior to ruling on any proposed discharge plan of 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 and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director, will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of the New Mexico Conservation Commission at Santa Fe, New Mexico, on this 18th day of April, 1993.

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

Journal: April 28, 1993

Dianne Berglund being duly sworn declares and says that she is National Advertising Sales Supervisor of the 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...28...day  
of.....Apr....., 1993, and the subsequent consecutive  
publications on....., 1993.



OFFICIAL SEAL

Bernadette Ortiz  
BERNADETTE ORTIZ  
NOTARY PUBLIC-NEW MEXICO  
NOTARY BOND FILED WITH SECRETARY OF STATE  
My Commission Expires 12-19-93  
CLA-22-A (R-1/93)

Dianne Berglund

Sworn and subscribed to before me, a Notary Public in  
and for the County of Bernalillo and State of New  
Mexico, this 28 day of April, 1993.

PRICE

\$ 25.43

Statement to come at end of month. KMB

ACCOUNT NUMBER

C 81184



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

February 7, 1996

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-614

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

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech Inc.'s (Envirotech) request and analytical results dated October 27, 1995 (received December 22, 1995) for authorization to deem specific landfarm cells remediated. Based upon the information provided the following cells are hereby approved for the addition of successive lifts:

Cell K-1	Cell H-4	Cell J-9
Cell K-2	Cell H-5	Cell I-10
Cell K-3	Cell H-6	Cell F-10
Cell H-2	Cell H-7	Cell G-10
Cell L-1	Cell H-8	Cell H-10
Cell L-2	Cell I-8	Cell G-11
Cell L-3	Cell J-8	Cell H-11
Cell H-12	Cell K-8	Cell I-11
Cell I-12	Cell E-1	Cell F-1
Cell I-13	Cell E-2	Cell F-2
Cell J-12	Cell E-3	Cell F-3
Cell J-13	Cell M-4	Cell A-9
Cell K-13	Cell M-3	Cell A-13
Cell L-13	Cell M-2	Cell A-14
Cell H-1	Cell L-4	Cell G-21
Cell I-1	Cell G-9	Cell G-22
Cell I-2	Cell H-9	Cell G-23
Cell I-3	Cell I-9	Cell H-21

RECEIVED  
DEC 22 1997  
OIL CON. DIV.  
DIST. 3

Note that authorization is being granted to add successive lifts. If Envirotech wants to move the soils from the facility separate OCD authorization must be granted.

Mr. Young  
February 7, 1996  
Page 2

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 responsibility for compliance with other federal, state and/or local regulations.

If there are any questions on this matter, please contact me at (505) 827-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Eustice", written over the printed name.

Chris Eustice  
Geologist

cc: 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 23, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-326-936-278**

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

RECEIVED  
DEC 22 1997

OIL CON. DIV.  
DIST. 3

**RE: Review of Analytical Data for Discontinued Maintenance Status, Land Farm #2  
NW 1/4, of Section 6, Twn. 26 North, Rng. 10 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 cells of Land Farm # 2 are hereby approved for discontinued maintenance status or the addition of successive lifts:

Cell A-5	Cell B-6	Cell C-11	Cell D-15
Cell A-6	Cell B-7	Cell C-12	Cell D-16
Cell A-7	Cell B-8	Cell C-14	Cell D-17
Cell A-8	Cell B-9	Cell C-15	Cell D-18
Cell A-10	Cell B-10	Cell C-16	Cell E-11
Cell A-12	Cell B-11	Cell C-17	Cell E-12
Cell A-15	Cell B-16	Cell C-18	Cell E-14
Cell A-16	Cell B-17	Cell C-20	Cell E-15
Cell A-17	Cell B-18	Cell C-21	Cell E-16
Cell A-18	Cell B-21	Cell C-22	Cell E-17
Cell A-19	Cell B-22	Cell C-26	Cell F-11
Cell A-20	Cell B-23	Cell D-8	Cell F-13
Cell A-21	Cell B-24	Cell D-11	Cell F-17
Cell A-22	Cell B-25	Cell D-12	Cell G-24
Cell A-23	Cell B-26	Cell D-13	Cell G-25
Cell A-25	Cell C-7	Cell D-14	Cell H-24
Cell A-26	Cell C-8	Cell D-15	Cell H-25



Mr. Young  
April 23, 1997  
Page 2 of 2

Cell I-15	Cell J-1	Cell J-5	Cell J-26
Cell I-24	Cell J-2	Cell J-6	Cell K-5
Cell I-25	Cell J-3	Cell J-7	Cell K-6
Cell I-26	Cell J-4	Cell J-25	Cell K-7
			Cell M-13

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 4 cells of Land Farm # 2 were not approved due to excessive holding time prior to analysis:

Cell H-23	Cell I-22	Cell I-23	Cell J-23
-----------	-----------	-----------	-----------

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. Kielling  
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 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

RECEIVED  
DEC 22 1997

OIL CON. DIV.  
DIST. 3

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. Kielling  
Environmental Geologist

xc: OCD Aztec Office

# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

OIL CONSERVATION DIVISION  
RECEIVED  
OCT 4 AM 8 52

RECEIVED  
OCT - 3 1995  
OIL CON. DIV.  
DIST. 3

October 3, 1995

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

Re: Landfarm #4 and Landfarm #5.  
Envirotech Soil Remediation Facility

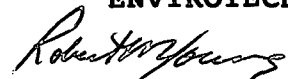
Dear Mr. Eustice:

This correspondence is to inform the New Mexico Oil Conservation Division (NMOCD) of the current usage of our NMOCD permitted Landfarm #2 Expansion Area. The Expansion Area was originally approved for use by NMOCD on August 17, 1993.

For tracking purposes, Envirotech will utilize different landfarm numbers for the expansion area. As noted on the attached map, Envirotech will use the Expansion Area to open Landfarm #4 and Landfarm #5. No other changes from the permit application have been made.

If this causes you any inconvenience, please let me know as soon as possible. Our phone number is (505) 632-0615. Thank you for your cooperation and guidance in operating our landfarms.

Respectfully submitted,  
**ENVIROTECH, INC.**



Robert M. Young  
Landfarm Supervisor

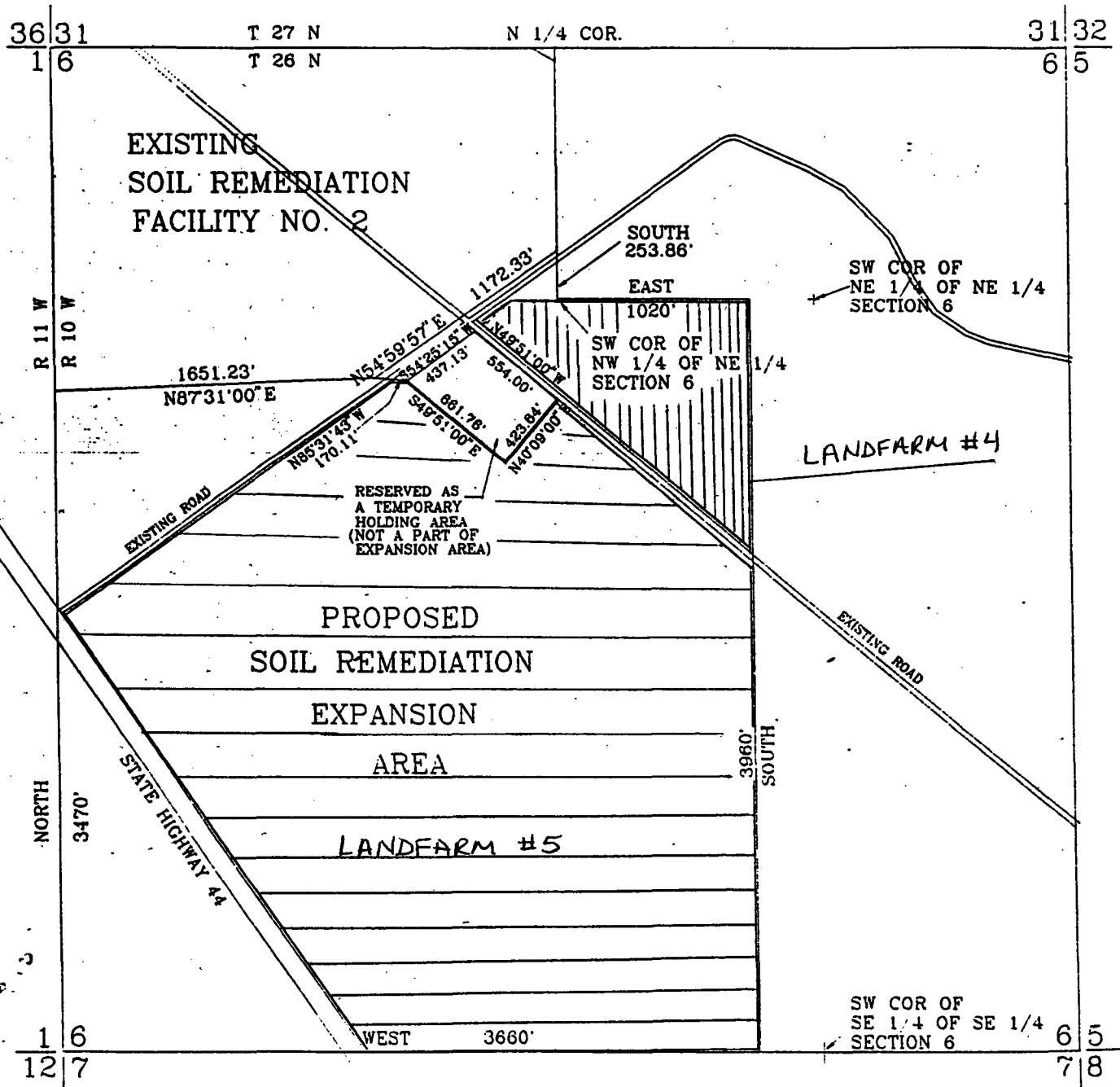
LF#4-5.LTR

Attachments

cc: Mr. Denny Foust, NMOCD Aztec, NM office.  
File

RMY/rmy

PLAT  
 TO ACCOMPANY DESCRIPTION FOR  
 YOUNG ENGINEERING SERVICES INC.  
 dba ENVIROTECH INC.  
 SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA



# ENVIROTECH INC.

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

Chris Eustice

OIL CONSERVATION DIVISION  
RECEIVED

'95 APR 10 AM 8 52

## WASTE-STREAM SAMPLE DOCUMENTATION ENVIROTECH SOIL REMEDIATION FACILITY

I \_\_\_\_\_ (printed name), as an employee of \_\_\_\_\_  
and a representative for \_\_\_\_\_ (generator) located at \_\_\_\_\_

\_\_\_\_\_, hereby certify that I have sampled (soil / water / solids / liquids / sludge : [circle one]) for RCRA Characterization, pursuant to 40 CFR 261 Subpart C, including (check applicable analyses):

- |                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> Ignitability | <input type="checkbox"/> TCLP Volatiles               |
| <input type="checkbox"/> Corrosivity  | <input type="checkbox"/> TCLP Semi-Volatiles          |
| <input type="checkbox"/> Reactivity   | <input type="checkbox"/> TCLP Pesticides / Herbicides |
| <input type="checkbox"/> TCLP Metals  | <input type="checkbox"/> Additional: _____            |

The sample is (a grab sample from the area of highest contamination / a \_\_\_\_-point composite: [mark one]), and is representative of the waste being sampled. This sample was submitted to \_\_\_\_\_ for analysis, and was assigned sample ID # \_\_\_\_\_, as noted on the attached Chain-of-Custody.

Included are diagrams of the waste (in-situ), top view and side view, including contamination source location and depth, sample location(s) and depth(s), pertinent on-site structures, scale, etc. for the generation site. Also, if the waste is not in-situ when sampled, attach additional diagrams of the stockpiled waste, top view and side view, including pertinent sampling information, for the waste at the time of sampling.

	I	
	N	
	S	
	I	
	T	
TOP VIEW	U	SIDE VIEW

The waste was generated from (check all that apply):

- |   |   |
|---|---|
| <input type="checkbox"/> Gasoline Underground Tank Spill            | <input type="checkbox"/> Gasoline Spill not from Underground Tank |
| <input type="checkbox"/> Diesel Underground Tank Spill              | <input type="checkbox"/> Diesel Spill not from Underground Tank   |
| <input type="checkbox"/> New-Oil Underground Tank Spill             | <input type="checkbox"/> New-Oil Spill not from Underground Tank  |
| <input type="checkbox"/> Used-Oil Spill                             | <input type="checkbox"/> Wash Bay (Solids \ Liquids \ Sludge)     |
| <input type="checkbox"/> Oilfield Pit (dehy, blow, sep, comp, drip) | <input type="checkbox"/> Laboratory                               |
| <input type="checkbox"/> Other: _____                               |   |

The generator (is \ is not) an oilfield service company or other company regulated by the New Mexico Oil Conservation Division.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

April 19, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-176-012-128**

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

**Re: REQUEST FOR AUTHORIZATION TO PROCESS FREE LIQUIDS  
ENVIROTECH LANDFARM NO. 2 (NM-01-0011)  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received Envirotech, Inc.'s (Envirotech) request dated February 21, 1995 requesting authorization to receive free liquids and apply the liquids to certified remediated cells for remediation.

Your request is hereby denied. The proposed process does not ensure protection of the surface water, ground water and the environment. Furthermore, the OCD has given Envirotech authorization to stabilize free liquids in the previously approved stabilization cell.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Eustice".

Chris Eustice  
Environmental Geologist

xc: OCD Aztec Office

# 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

95 FEB 16 AM 8 52

RECEIVED

FEB 21 1995

Environmental Bureau  
Oil Conservation Division

February 13, 1995

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: Permission to Process Free Liquids  
by Direct Land Application

Dear Mr. Anderson:

Envirotech Inc. requests authorization to receive free liquids i.e.: tank bottoms and sludges by direct application to certified remediated soil.

This method will prevent subsurface migration of contaminate, while at the same time providing the versatility of one time application and handling. Costs therefore to both client and Envirotech are also reduced.

Specifically the receiving cell will be prepared with six (6) inches of soil certified as clean (less than 100 ppm TPH per USEPA method 418.1). Free liquid would then be applied to the prepared cell in a uniform spray at an amount not to exceed 0.6 barrels per square yard of surface area. This will allow a safety factor of 1.30 as compared to the 1 cubic yard of clean soil per barrel of contaminated media that is normally used to stabilize contaminated media.

Following application of free liquids in the manor described, the area will remain undisturbed for a minimum of twelve (12) hours to allow complete absorption of the free liquids. Following the appropriate setting time, the area will be tilled to work the contaminated media into the underlying six (6) inches left.

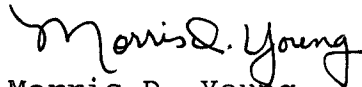
In addition to the quarterly subsurface monitoring required by our current permit, a sample will be collected at 24 inches beneath center of the cell and tested for TPH every 30 days for the first quarter following application.



After you and your staff review this procedure, we would then ask for approval to immediately implement it at our Landfarm No. 2 facility.

If you have any question or require more information, please contact Morris Young at (505) 632-0615.

Sincerely,

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

Morris D. Young  
President  
MDY/cj533

CC: Denny Foust, NMOCD Aztec District Office

## MEMORANDUM

TO: JUDY AMER

SUBJECT: RESULTS OF ENVIROTECH ANALYSES

DATE: JULY 27, 1994

ED 29A&B 6-21-94  
(Soil from pit)

None detected

Ninety-five percent (95%) of the samples yielded results with levels of hazardous waste constituents above the regulatory limits. The regulatory limits for the characteristic wastes detected are as follows:

Benzene	0.5 ppm	(also F-listed)
Chromium	5.0 ppm	
MEK	200 ppm	(also F-listed)

The remainder of the hazardous wastes detected are listed and either toxic, ignitable or both:

Toluene	F005	ignitable and toxic
Benzene	F003	listed only if ignitable
1,1-dichloroethane	F001, F002	toxic
1,2-dichloroethane	F001, F002	toxic
2-methyl isobutyl ketone	F003	listed only if ignitable
Tetrachloroethylene	F001, F002	toxic
Acetone	F003	listed only if ignitable
Xylene	F003	listed only if ignitable

In order to obtain the results for some of the constituents, dilution factors ranging from 1 to 2,000 fold had to be utilized. Based upon these results, the containers recovered at the Envirotech Landfarm do contain hazardous wastes. If you have any questions please contact me.

## MEMORANDUM

TO: JUDY AMER

SUBJECT: RESULTS OF ENVIROTECH ANALYSES

DATE: JULY 27, 1994

ED-17	6-21-94	MEK (4,500 ppm), Ethylbenzene (1,300 ppm), Toluene (570 ppm), Total Xylenes (6,500 ppm)
ED-18	6-21-94	MEK (470 ppm), Ethylbenzene (3,100 ppm), Toluene (2,900 ppm), Total Xylenes (14,000 ppm)
ED-19	6-21-94	MEK (75 ppm), Ethylbenzene (1,100 ppm), Toluene (120 ppm), Total Xylenes (4,600 ppm)
ED-20	6-21-94	MEK (140 ppm), Ethylbenzene (1,500 ppm), (Tetrachloroethene (1,100 ppm), Toluene (530 ppm), 1,1,1-Trichloroethane (830 ppm), Trichloroethene (61 ppm), Total Xylenes (7,500 ppm)
ED-21	6-21-94	Acetone (110 ppm), MEK (12,000 ppm), Ethylbenzene (1,100 ppm), Tetrachloroethene (6.6 ppm), Toluene (390 ppm), 1,1,1-Trichloroethane (4.0 ppm), Total Xylenes (4,500 ppm), <b>Chromium (39.0 ppm)</b>
ED-22	6-21-94	MEK (10,000 ppm), Ethylbenzene (4,800 ppm), Methylene Chloride (560 ppm), Toluene (1,300 ppm), Total Xylenes (18,000 ppm)

## MEMORANDUM

TO: JUDY AMER  
 SUBJECT: RESULTS OF ENVIROTECH ANALYSES  
 DATE: JULY 27, 1994

ED-23

6-21-94

Acetone (110 ppm), MEK  
 (7,000 ppm), 1,1-  
 Dichloroethane (7.2 ppm),  
 Ethylbenzene (3,800 ppm),  
 Methylene Chloride (55  
 ppm), Tetrachloroethene  
 (590 ppm), Toluene (1,700  
 ppm), 1,1,1-  
 Trichloroethane (1,500  
 ppm), Trichloroethene (15  
 ppm), Total Xylenes  
 (14,000 ppm)

ED-24

6-21-94

Acetone (2,400 ppm), MEK  
 (51,000 ppm),  
 Ethylbenzene (7,700),  
 Methylene Chloride (220  
 ppm), Toluene (2,300  
 ppm), Total Xylenes  
 (33,000 ppm)

ED-25A&amp;B

6-21-94

Acetone (290 ppm), MEK  
 (12,000 ppm),  
 Ethylbenzene (3,900 ppm),  
 Toluene (750 ppm), Total  
 Xylenes (15,000 ppm)

ED-26A&amp;B

6-21-94

Acetone (43 ppm), Benzene  
 (4.5 ppm), MEK (270 ppm),  
 Ethylbenzene (5,500 ppm),  
 Toluene (1,200 ppm),  
 Trichloroethene (97 ppm),  
 Total Xylenes (21,000  
 ppm)

ED-27A&amp;B

6-21-94

(East soil pile)

Ethylbenzene (.22 ppm),  
 Methylene Chloride (.88  
 ppm), Toluene (.059 ppm),  
 Total Xylenes (1.2 ppm)

ED-28A&amp;B

6-21-94

(West soil pile)

Ethylbenzene (.83 ppm),  
 Toluene (.14 ppm), Total  
 Xylenes (8.2 ppm)

## MEMORANDUM

TO: JUDY AMER

SUBJECT: RESULTS OF ENVIROTECH ANALYSES

DATE: JULY 27, 1994

ED-7	6-21-94	MEK (48 ppm), Ethylbenzene (1,600 ppm), Methylene Chloride (12 ppm), Toluene (590 ppm), Total Xylenes (6,900)
ED-8	6-21-94	Acetone (180 ppm), MEK (32,000 ppm), Ethylbenzene (4,400), Methylene Chloride (8.7 ppm), Tetrachloroethene (13 ppm), Toluene (2,200 ppm), 1,1,1-Trichloroethane (34 ppm), Total Xylenes (22,000 ppm)
ED-9	6-21-94	Acetone (170 ppm), Benzene (3.8 ppm), MEK (17,000 ppm), Ethylbenzene (7,200 ppm), Methylene Chloride (10 ppm), Tetrachloroethene (16 ppm), Toluene (2,400 ppm), 1,1,1-Trichlorofluoromethane (1,200 ppm), Total Xylenes (30,000 ppm)
ED-10	6-21-94	Acetone (210 ppm), MEK (2,800 ppm), Ethylbenzene (2,100 ppm), Methylene Chloride (42 ppm), Toluene (5,300 ppm), Total Xylenes (9,900 ppm)

## MEMORANDUM

TO: JUDY AMER

SUBJECT: RESULTS OF ENVIROTECH ANALYSES

DATE: JULY 27, 1994

E-I-7	6-15-94	Toluene (7,600 ppm), Ethylbenzene (60,000 ppm), Total Xylenes (270,000 ppm)
ED-1	6-21-94	Ethylbenzene (71 ppm), Toluene (78 ppm), Total Xylenes (820 ppm)
ED-2	6-21-94	MEK (130 ppm), Ethylbenzene (3,800 ppm), Toluene (690 ppm), 1,1,1-Trichloroethane (26 ppm), Total Xylenes (17,000 ppm)
ED-3	6-21-94	Acetone (6.3 ppm), MEK (97 ppm), Ethylbenzene (55 ppm), Toluene (22 ppm), Total Xylenes (240 ppm)
ED-4	6-21-94	MEK (360 ppm), Ethylbenzene (3,600 ppm), Tetrachloroethene (17 ppm), Toluene (620 ppm), 1,1,1-Trichloroethane (6.9 ppm), Total Xylenes (12,000 ppm)
ED-5	6-21-94	Acetone (410 ppm), Benzene (1.2 ppm), MEK (19,000 ppm), Ethylbenzene (1,200 ppm), Methylene Chloride (18 ppm), Toluene (840 ppm), 1,1,1-Trichloroethane (8.5 ppm), Total Xylenes (5,400 ppm)
ED-6	6-21-94	MEK (340 ppm), Ethylbenzene (320 ppm), Methylene Chloride (4.9 ppm), Tetrachloroethene (0.65 ppm), Toluene (90 ppm), Total Xylenes (1,300 ppm)



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: JUDY AMER, NMED/OGC

THROUGH *Ben* BENITO GARCIA, CHIEF HRMB  
COBY MUCKELROY, PROGRAM MANAGER RCRA INSP./ENF. *ay*

FROM: JOHN TYMKOWYCH, SUPERVISOR RCRA INSP./ENF. *J.m.T.*

DATE: JULY 27, 1994

SUBJECT: RESULTS OF ANALYSES ON SAMPLES OBTAINED FROM RECOVERED  
CONTAINERS AT ENVIROTECH LANDFARM

The HRMB has received the official results of analyses performed on samples obtained from the containers exhumed at the Envirotech Landfarm #1. Samples were obtained on two separate visits during the excavation activities conducted by Envirotech at the request of the OCD and the NMED. I have summarized the results of the analyses:

SAMPLE #	DATE SAMPLED	RESULTS
E-I-1	6-15-94	Nothing Detected
E-I-2	6-15-94	Benzene (70 ppm), Toluene (90 ppm), Total Xylenes
E-I-3A&B	6-15-94	Toluene (50 ppm)
E-I-4A&B	6-15-94	Toluene (66,000 ppm), Ethylbenzene (28,000 ppm), Total Xylenes (130,000 ppm)
E-I-5A&B	6-15-94	Toluene (11,000 ppm), Ethylbenzene (7,700 ppm), Total Xylenes (34,000 ppm)
E-I-6	6-15-94	Toluene (100,000 ppm), Ethylbenzene (60,000 ppm), Total Xylenes (220,000 ppm)

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 7
To ROGER ANDERSON	From J. TYMKOWYCH	
Co.	Co.	
Dept. OCD	Phone # 4308	
Fax #		

## MEMORANDUM

TO: JUDY AMER

SUBJECT: RESULTS OF ENVIROTECH ANALYSES

DATE: JULY 27, 1994

ED-11	6-21-94	Acetone (1,100 ppm), Benzene (1.6 ppm), MEK (51,000 ppm), Ethylbenzene (4,100), Methylene Chloride (9.2 ppm), Toluene (1,500 ppm), Total Xylenes (17,000 ppm)
ED-12	6-21-94	MEK (3.4 ppm), Ethylbenzene (1.9 ppm), Toluene (.96 ppm), Total Xylenes (13 ppm)
ED-13	6-21-94	Acetone (87 ppm), MEK (4,600 ppm), Ethylbenzene (2,900 ppm), Toluene (1,300 ppm), Total Xylenes (13,000 ppm)
ED-14	6-21-94	Benzene (6.2 ppm), MEK (17,000 ppm), Ethylbenzene (9,300 ppm), MIBK (61 ppm), Toluene (13,000 ppm), Total Xylenes (48,000 ppm), Chromium (11.8 ppm)
ED-15	6-21-94	MEK (7.1 ppm), Ethylbenzene (12 ppm), Tetrachloroethene (.2 ppm), Toluene (4.6 ppm), 1,1,1-Trichloroethane (.16 ppm), Total Xylenes (87 ppm)
ED-16	6-21-94	MEK (46 ppm), Ethylbenzene (160 ppm), Toluene (67 ppm), Total Xylenes (800 ppm)



DISCHARGE PLAN INSPECTION REPORT FOR  
REFINERIES, GAS PLANTS AND COMPRESSOR STATIONS

rev. 12/93

OPERATOR: Envirotech

FACILITY NAME: Landfarm #2

GW-#:

TYPE: OCD commercial landfarm

LOCATION:

COUNTY: San Juan

INSPECTION DATE: March 22, 1994

INSPECTOR(S): R. Anderson, B. Myers

CONTAINMENT

Berms: landfarm area completely bermed, with inner berms subdividing area.

WASTE STREAM

Solid: All soils looked to be spread & tilled adequately. Crews picking up liner plastic from spread soils.

Miscellaneous: each area well marked as cells, with areas clearly identified for particular companies.

signature

B. Myers

date

4/7/94



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

April 8, 1994

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-111-334-164**

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

**RE: OCD RULE 711 CLARIFICATION - MUD PITS  
ENVIROTECH LANDFARM NO. 2  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received your request dated February 22, 1994, for clarification of the OCD Rule 711 Permit approval for expansion of your Landfarm No. 2 located in Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The August 17, 1993 approval for expansion of Envirotech Landfarm No. 2 did not address Envirotech's additional request to accept drilling mud into unlined pits in the area of expansion.

The following comments and requests for additional information are based on the OCD's review of your original request dated April 2, 1993, and the materials dated February 22, 1994. Submission of the following information will allow review of your request for acceptance of drilling mud to continue.

1. Envirotech's proposal is to accept drilling mud into unlined pits for drying and then to either bury it in place or landfarm it. The OCD requires all drilling mud accepted at commercial disposal facilities to be received in a self-contained vesicle to remove any oil and free water from the mud prior to landfarming. Please submit a detailed plan which permits removal of oil and water from the mud in a self-contained system. Include final disposition of the oil and water.

Mr. Robert M. Young

April 8, 1994

Page 2

2. The OCD requires approval from the District Supervisor to move mud from a drilling location to a commercial disposal facility. In addition to permit conditions previously approved requiring specific information on incoming loads, the OCD also requires the following information for each incoming load of drilling mud: 1) well operator name, 2) the well name and location from which the mud was transported, 3) transporter, and 4) description of mud program (ie. mud composition including volume and type of chemicals added). All mud information must be maintained on file at the facility for five years from the date of receipt. Please submit a commitment for obtaining the above information for incoming loads of drilling mud.
3. Landfarming procedures and remediation levels for drilling mud must be in accordance with previous OCD approvals for Envirotech Landfarm No. 2. District approval must be obtained if reconditioned mud is to be removed from the facility. What specific options are you requesting for recycling of drilling mud.
4. Loads of drilling mud which contain miscellaneous hydrocarbons exceeding 2/10 of 1% of the total volume of mud must be accompanied by an OCD approved C-117A from the well operator. Accumulations of miscellaneous hydrocarbons must be reported monthly on form C-112 and transportation of these hydrocarbons is permitted only by an approved C-104. Please submit a commitment to the above records requirement.

Addressing the above items will allow review of your request for acceptance of drilling mud to continue. If you have any questions please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,



Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office

# ENVIROTECH INC.

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

5796 U.S. HIGHWAY 64 - 3014

FARMINGTON, NEW MEXICO 87401 '94 FEB 23 AM 8 39

PHONE: (505) 632-0615

February 22, 1994

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

Re: Clarification of Rule 711 Permit for Landfarm #2  
Envirotech Soil Remediation Facility

Dear Ms. Brown:

As per our "Expansion of Soil Remediation Facility No. 2, Section 6, T. 26 N., R. 10 W., San Juan County, New Mexico" dated April 2, 1993, Envirotech requested permission from the New Mexico Oil Conservation Division (NMOCD) to construct and operate multiple pits for the acceptance and disposal of drilling mud. This portion of our request was not specifically addressed in the resulting NMOCD permit for the expansion of Landfarm #2. This correspondence is to request clarification of our Rule 711 Permit for Landfarm #2, Envirotech Soil Remediation Facility, Hilltop, New Mexico.

We request this clarification to our permit to allow us to accept drilling mud for emplacement into unlined evaporation pits, as per the April 2, 1993 request. The emplacement of drilling mud pits has previously met the requirements for public notification, as per the attached NOTICE OF PUBLICATION, submitted by the NMOCD. These pits will be referred to as the MudPit Disposal Facility.

The anticipated location of the pits will be in the Landfarm #2 Expansion Area, within an isolated fenced area. Refer to the attached plat for the approximate location of the MudPit Disposal Facility.

The anticipated dimensions of the pits is to be approximately 100' X 100' X 4' deep. A free-board of 1' will be constructed along the perimeter of each pit to prevent overflow of the pits. The sides of the pits will be constructed with a 2 horizontal to 1 vertical slope.

Refer to the attached MudPit Disposal Facility diagram for a schematic of the proposed pits.

Drilling mud emplaced into these pits will be allowed to settle,

excessive free liquids will be removed on a weekly basis, and the remaining mud will be allowed to dry.

Free liquids will be placed into a oil-water separating tank for separation. Any collected oil will be disposed of as per NMOCD direction. Collected water will be spread onto the landfarm for dust control and enhancement of bioremediation.

As a pit reaches its maximum capacity, another pit will be constructed and used. This will allow the full pit to dry prior to capping. When a pit is full and dry (4' deep with no free liquids on surface), they will be capped with a minimum of 12" of native soil and re-seeded as per our original permit specifications. If this method of abandonment is not acceptable to the NMOCD, the dried mud may be removed and thin-spread landfarmed as an alternate method.

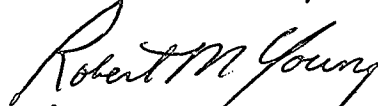
We anticipate receiving approximately 2,000 - 5,000 barrels of drilling mud on an annual basis that would require emplacement in these disposal pits.

It is our understanding that representative samples from the first 6 loads of drilling mud accepted at the MudPit Disposal Facility will be sampled for analysis per USEPA Method 418.1. The results of these analyses will be submitted to your office as they become available. These analytical results will determine the need for possible future sampling.

It is also our understanding that the NMOCD District Office must pre-approve the removal of all drilling mud from a drilling location. Additionally, the procedure for acceptance of all material at the MudPit Disposal Facility will follow currently established NMOCD guidelines for Landfarm #2.

Thank you for your assistance in this matter. We sincerely appreciate working with you on our landfarms.

Respectfully submitted,  
**ENVIROTECH, INC.**



Robert M. Young  
Landfarm Supervisor

MUDPIT.LTR

cc: Mr. Denny Foust, NMOCD Aztec, NM office.  
File

RMY/rmy

## **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 Commission Regulations, the following application to modify a commercial surface waste disposal facility have 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:

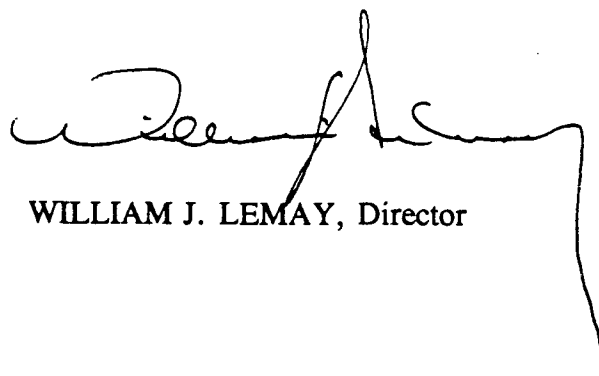
**Envirotech Inc., Morris D. Young, President, 5796 U.S. Highway 64 - 3014, Farmington, New Mexico 87401, has submitted an application to modify their previously approved commercial landfarm facility located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 12 inch lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the south and east an additional 495 acres. The modification also proposes to construct unlined pits to accept drilling mud which would be dried and then moved onto the land farm to be remediated. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.**

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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico,  
on this 16th day of April, 1993.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read 'William J. Lemay', with a long, sweeping vertical line extending downwards from the end of the signature.

WILLIAM J. LEMAY, Director

S E A L

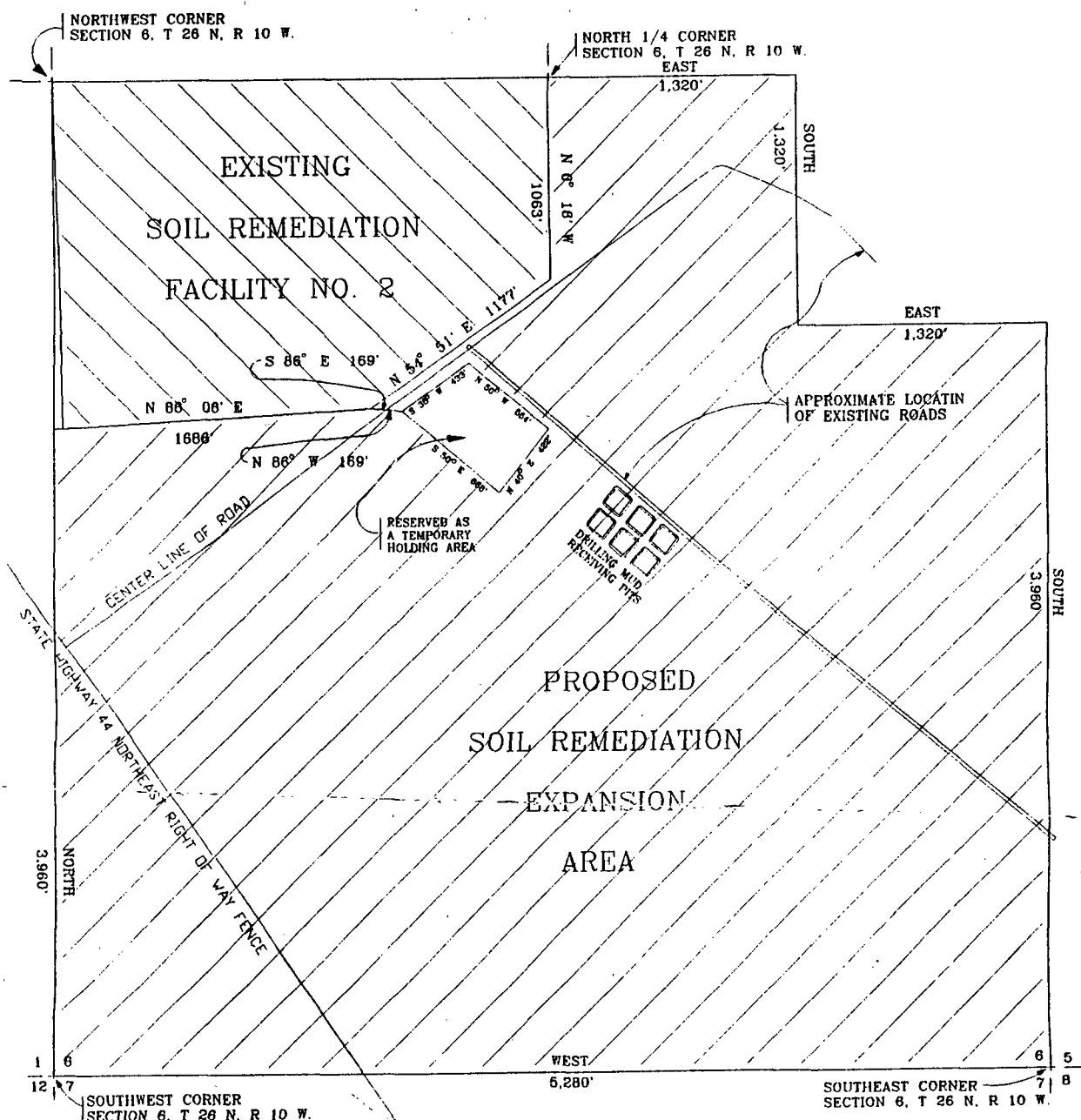
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY No. 2 EXPANSION AREA

Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, T. 26 N., R. 10 W., NMPM, San Juan County, New Mexico, and being more particularly described as follows:

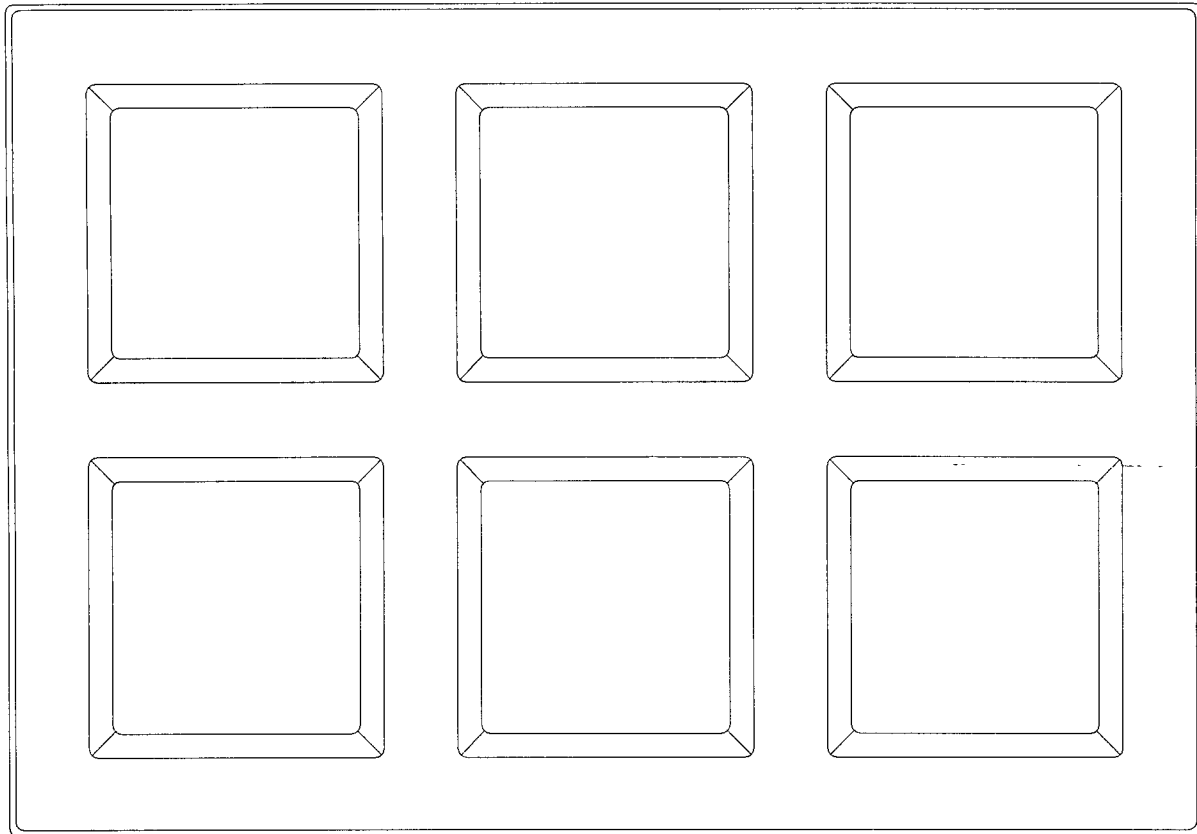
BEGINNING AT THE SW corner of said Section 6;  
THENCE North 3,960 feet along the section line;  
THENCE East 1,500 feet;  
THENCE S 86° E 169' feet;  
THENCE S 54° W 420 feet;  
THENCE S 50° E 668 feet;  
THENCE N 40° E 422 feet;  
THENCE N 50° W 554 feet;  
THENCE N 86° W 169' feet;  
THENCE N 54° 51' E 1177 feet along a road;  
THENCE N 0° 18' W 1,063 feet to the N  $\frac{1}{4}$  corner of said Section 6;  
THENCE East 1,320 feet;  
THENCE South 1,320 feet;  
THENCE East 1,320 feet to the Section line;  
THENCE South 3,960 feet along the Section line to the Southeast corner of said Section 6;  
THENCE West 5,280 feet along the Section line to the SW corner of said Section 6 the point of Beginning.

The tract as described contains 495 acres, more or less, and NO right-of-ways, easements, restrictions, or reservations were researched or shown.

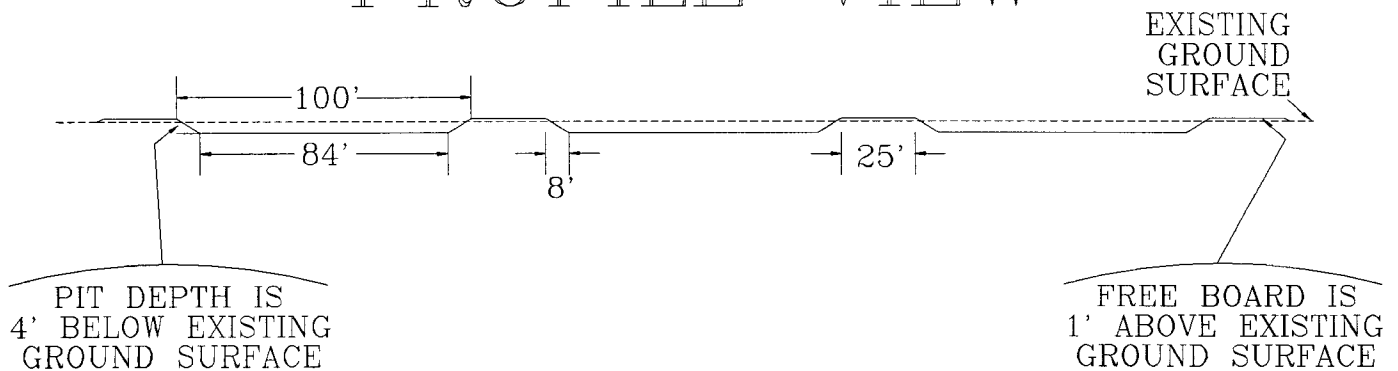




# TOP VIEW



# PROFILE VIEW



ENVIROTECH SOIL  
REMEDIAITON FACILITY

HILLTOP, NEW MEXICO

OIL CONSERVATION DIVISION

ENVIROTECH INC.

ENVIRONMENTAL SCIENTISTS & ENGINEERS

5796 U.S. HIGHWAY 64-3014

FARMINGTON, NEW MEXICO 87401

PHONE (505) 632-0615

MudPit Disposal Facility

SHEET: 1 DATE: 2/94

DRW: RMY PRJ MGR: RMY



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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

February 17, 1994

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-059**

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

**RE: STABILIZATION FACILITY APPROVAL  
ENVIROTECH LANDFARM NO. 2  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received your request dated January 5, 1994, for authorization to construct a stabilization basin to accept non-hazardous semi-solid oilfield wastes at Envirotech's Landfarm No. 2 located in Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The wastes which fail the paint filter test will be placed in either the stabilization basin or a flow-through above ground storage tank and blended with clean soil and organic materials to achieve a moisture content acceptable for distribution at the landfarm.

Based on the information provided in your original request and the materials dated February 4, 1994, submitted as supplements to the application, the OCD hereby approves the construction and utilization of a stabilization area under the following conditions:

1. The stabilization basin will be constructed with the following specifications:
  - a. The basin will be constructed with 12 inches of concrete reinforced with re-bar. The basin will have a berm approximately 3 feet high.

- b. The concrete basin will be underlain with a double-lined (30 mil) containment system equipped with leak detection.
  - c. The OCD Aztec Office will be notified prior to installation of the liners and leak detection system so that they may witness the construction.
  - d. As built engineering designs for the staging area will be submitted to the OCD within 60 days of completion.
- 2. The leak detection monitor well for the staging area will be checked weekly and records of such inspections will be made and kept on file at the facility for five (5) years from the date of record. If fluids are found in the sump the operator shall notify the OCD Aztec District Office within twenty-four (24) hours of discovery.
- 3. The above ground flow-through storage tanks will be placed in an above ground concrete basin with adequate berming.
- 4. Every load received at the facility for pretreatment in the staging area will be tested for the percentage of oil using an approved OCD method. Test results will be recorded, retained at the facility, and reported to the OCD quarterly. This approval is subject to administrative change based upon the test results and changes in oil recovery technology.
- 5. The operator shall file forms C-117-A, C-118, and C-120-A with the OCD Aztec District Office as required by OCD Rules 1118 and 1120.
- 6. All materials accepted at stabilization facility will be stabilized within 24 hours of receipt. No free liquids or soils with free liquids will be moved from the pretreatment staging area to the landfarm.
- 7. Comprehensive records of all materials received in the staging area will be maintained at the facility for five (5) years from the date of record. The records for each load will include: 1) the origin, 2) transporter, 3) test results, 4) amount, type and origin of soil and/or bulking agents added to each load, and 5) exact cell location where the material is to be remediated.
- 8. The pretreatment staging area is authorized to accept only oilfield wastes which are exempt from RCRA Subtitle C regulations or "nonhazardous" non-exempt oilfield wastes on a case-by-case basis after conducting an analysis for hazardous characteristics and receiving OCD approval.

Mr. Robert M. Young  
February 17, 1994  
Page 3

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters, or the environment actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

Please be advised that in accordance with OCD Rule 310, oil shall not be stored or retained in earthen reservoirs, or in open receptacles.

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

Sincerely,

A handwritten signature in cursive script, reading "Kathy M. Brown". The signature is written in dark ink and is positioned below the word "Sincerely,".

Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office

# ENVIROTECH<sup>●</sup> INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014

FARMINGTON, NEW MEXICO 87401

PHONE: (505) 632-0615

OIL CONSERVATION DIVISION  
RECEIVED

94 FEB 7 AM 8 35

February 4, 1994

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

Re: Supplemental Information  
Modification of Rule 711 Permit for Landfarm #2  
Envirotech Soil Remediation Facility

Dear Ms. Brown:

This correspondence is per the request of Mr. Denny Foust of the New Mexico Oil Conservation Division (NMOCD) to provide supplemental information and drawings for Envirotech's request the modification of our Rule 711 Permit for Landfarm #2, Envirotech Soil Remediation Facility, Hilltop, New Mexico. This request was submitted to NMOCD on January 5, 1994.


Mr. Foust requested several specific cross section views of the stabilization basin. As per his request, cross sections for A-A' and for B-B', as noted on the diagram labeled "Waste Stabilization Facility, Sheet: 1" are illustrated on the diagram "Waste Stabilization Facility, Sheet: 2".

At this time Envirotech has not acquired the flow through-tanks that are noted in the diagram "Waste Stabilization Facility, Sheet: 1". Envirotech would like permission to construct and operate the stabilization basin without the flow through-tanks until the tanks can be installed. We do not anticipate this to disrupt, in any way, the effectiveness or performance of the stabilization facility.

Thank you for your assistance in this matter. If you have any additional questions or, please feel free to contact me at (505) 632-0615.

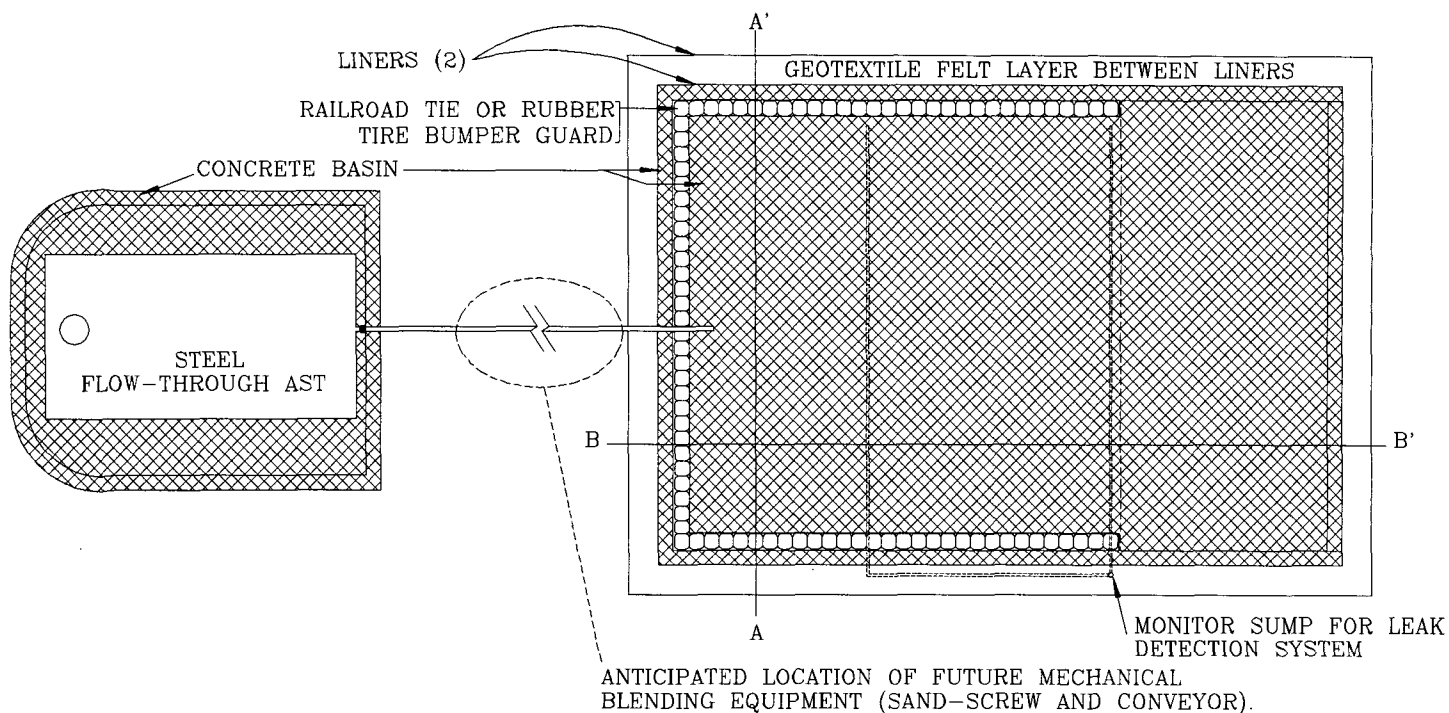
Respectfully submitted,

ENVIROTECH, INC.

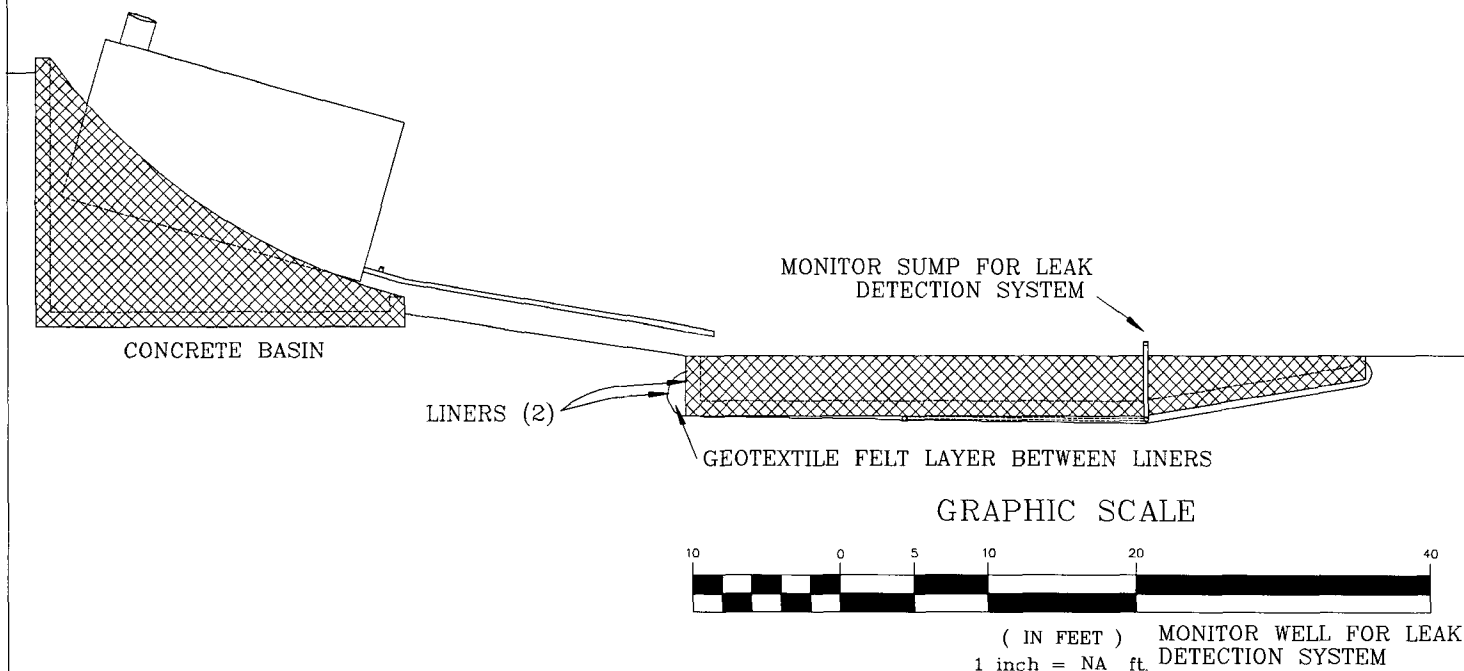
  
Robert M. Young  
Environmental Biologist

BLENDSUP.LTR

cc: Mr. Denny Foust, NMOCD Aztec, NM office.  
File  
RMY/rmy



## TOP VIEW SIDE VIEW

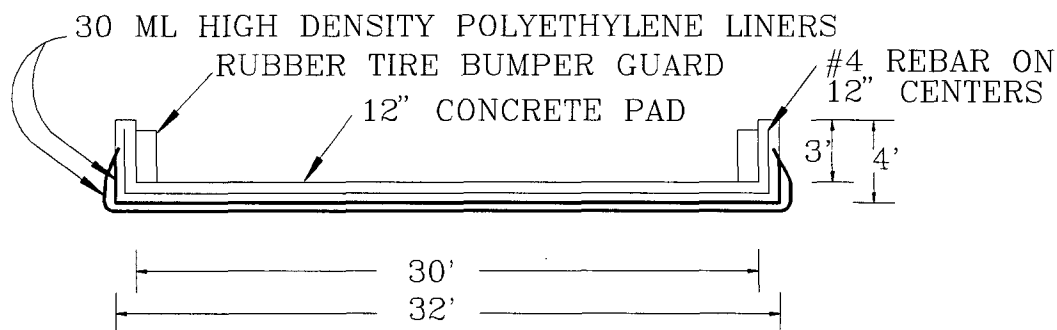


ENVIROTECH SOIL  
REMEDIAITON FACILITY  
HILLTOP, NEW MEXICO  
OIL CONSERVATION DIVISION

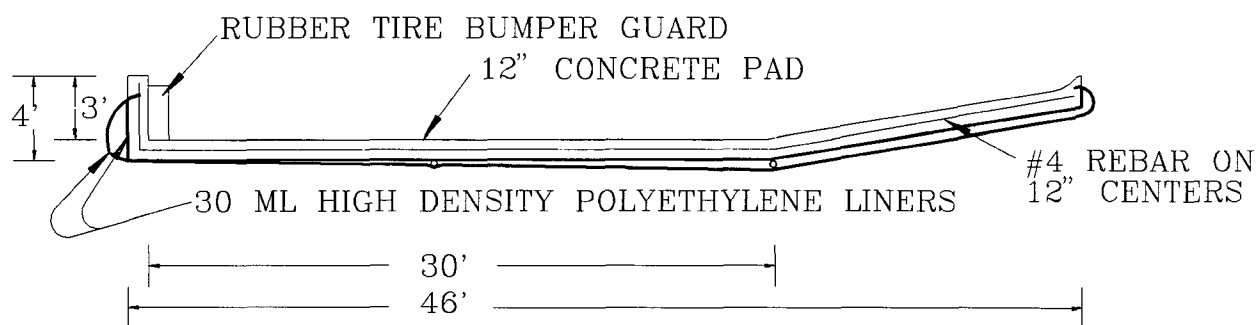
ENVIROTECH INC.  
ENVIRONMENTAL SCIENTISTS & ENGINEERS  
5796 U.S. HIGHWAY 64-3014  
FARMINGTON, NEW MEXICO 87401  
PHONE (505) 632-0615

WASTE STABILIZATION FACILITY  
SHEET: 1 DATE: 1/94  
DRW: RMY PRJ MGR: RMY

# A-A' CROSS SECTION



# B-B' CROSS SECTION



ENVIROTECH SOIL  
REMEDIATION FACILITY  
HILLTOP, NEW MEXICO

OIL CONSERVATION DIVISION

ENVIROTECH INC.

ENVIRONMENTAL SCIENTISTS & ENGINEERS  
5796 U.S. HIGHWAY 64-3014  
FARMINGTON, NEW MEXICO 87401  
PHONE (505) 632-0615

WASTE STABILIZATION FACILITY

SHEET: 2 DATE: 2/94

DRW: RMY PRJ MGR: RMY

# ENVIROTECH INC.

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

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

'94 JAN 10 AM 8 16

January 5, 1994

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

Re: Modification of Rule 711 Permit for Landfarm #2  
Envirotech Soil Remediation Facility

Dear Ms. Brown:

This correspondence is to request the modification of our Rule 711 Permit for Landfarm #2, Envirotech Soil Remediation Facility, Hilltop, New Mexico.

Envirotech has received numerous requests for acceptance of non-hazardous oilfield semi-solid wastes that fail the paint-filter test (United States Environmental Protection Agency Method 9095, as outlined in SW-846). Although there are many sources of semi-solid waste material, the following is a partial list of some of the anticipated sources:

- Mixed drilling mud.
- Wash-bay solids from oilfield companies.
- Solids from produced water injection wells.
- Tank bottoms.
- Hydrocarbon saturated soils.

We request the modification to our permit to allow us to accept these wastes for stabilization followed by thin-spread landfarming.

We anticipate receiving approximately 500 tons of semi-solid material on an annual basis that would require stabilization at this facility.

Materials approved by NMOCD for acceptance at Landfarm #2 will be tested per the paint filter test to determine if stabilization is required. If stabilization is required, materials will be placed at the facility. Depending on the amount of free liquid in the materials, they will either be placed directly into the stabilization basin or they will be placed into the flow-through above-ground storage tank to regulate flow into the stabilization basin. All wastes accepted at the stabilization facility will be stabilized within 24 hours of receipt of the material.



Stabilization will entail the mechanical blending of the semi-solid waste with a mixture of clean soil and organic materials (ie. manure, saw-dust, straw, etc.). Organic materials will be approved by NMOCD prior to initial application.

The stabilization basin will be constructed of 12" concrete reinforced with re-bar. This basin will be placed within a earthen basin that is double-lined with 30 mil. PVC liner equipped with leak detection. The flow-through tank will be placed into a concrete basin of similar construction, however, leak detection is not anticipated for this tank and concrete basin. These measures are to minimize possible release of liquids into the soils below the facility.

Refer to the attached Waste Stabilization Facility diagram for a schematic of the proposed stabilization facility.

Thank you for your assistance in this matter. We sincerely appreciate working with you on our landfarms.

Respectfully submitted,  
**ENVIROTECH, INC.**

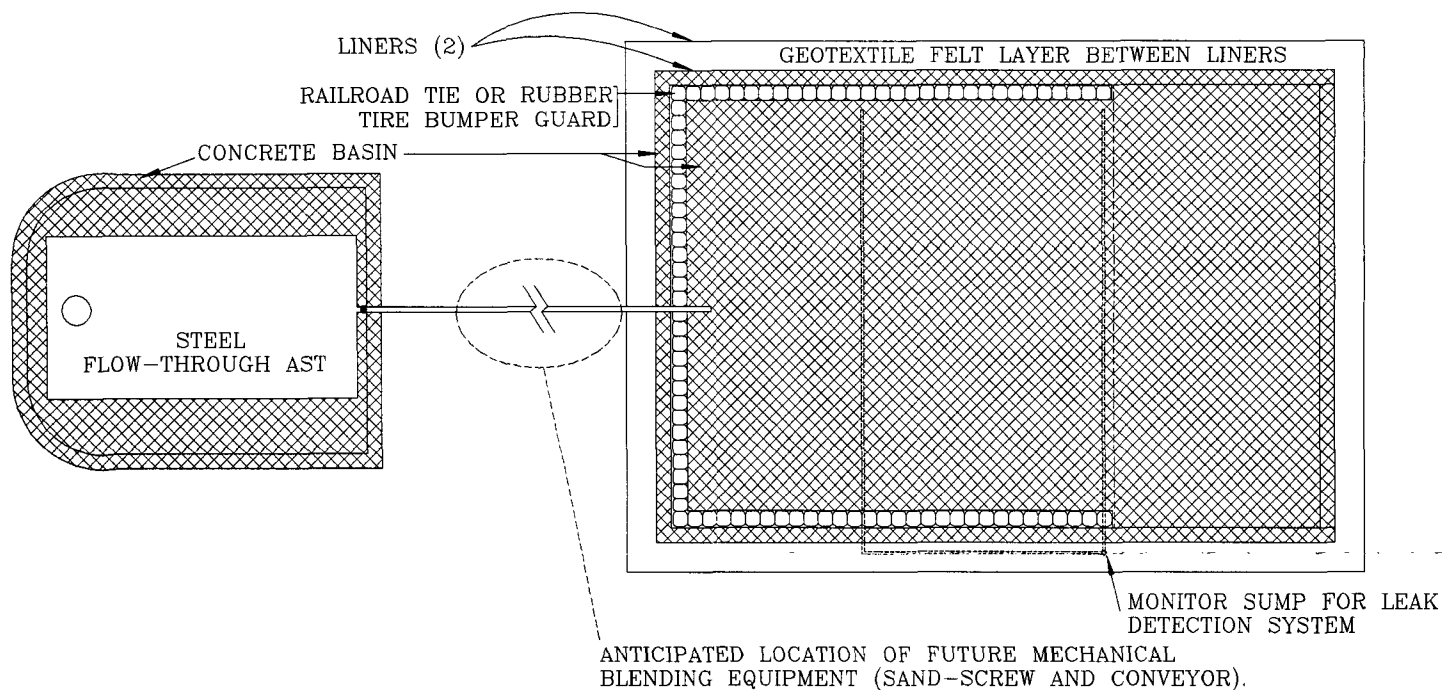
*Robert M Young*

Robert M. Young  
Environmental Biologist

BLEND.LTR

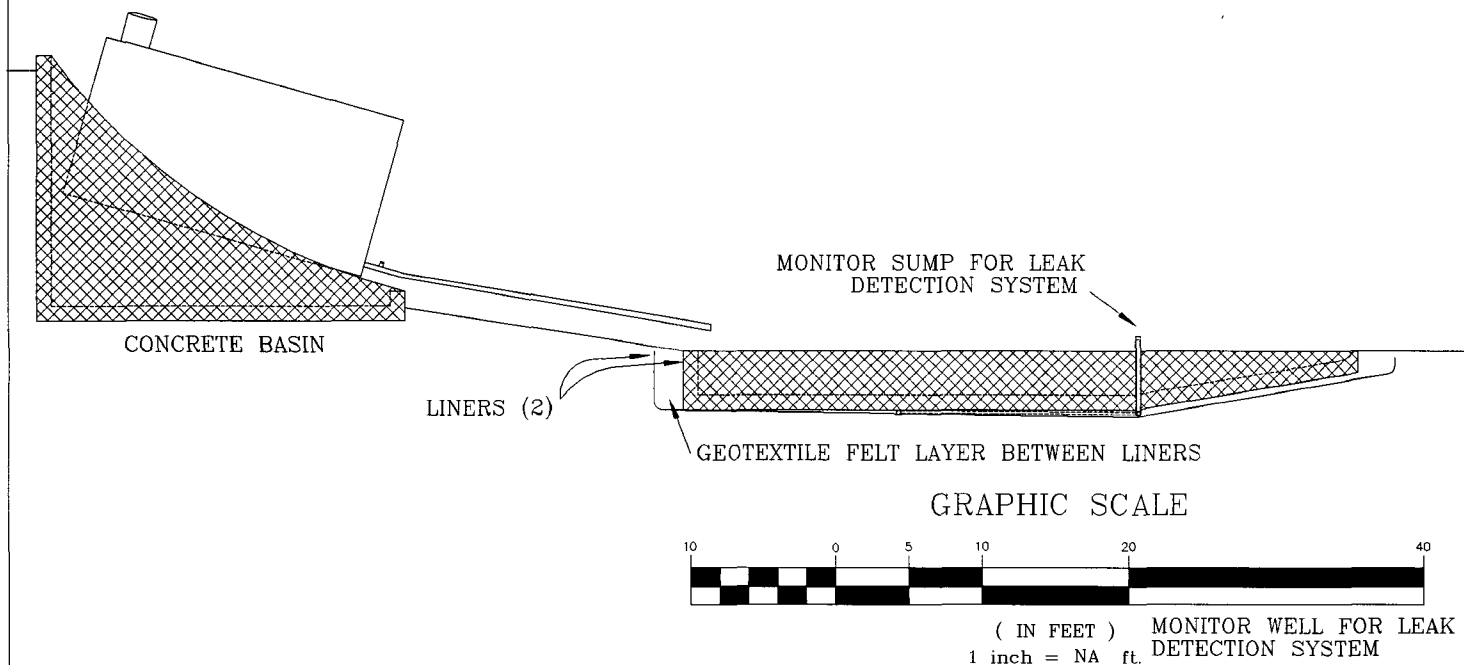
cc: Mr. Denny Foust, NMOCD Aztec, NM office.  
File

RMY/rmy



TOP VIEW

SIDE VIEW



ENVIROTECH SOIL  
REMEDIATION FACILITY

HILLTOP, NEW MEXICO

OIL CONSERVATION DIVISION

ENVIROTECH INC.

ENVIRONMENTAL SCIENTISTS & ENGINEERS

5796 U.S. HIGHWAY 64-3014

FARMINGTON, NEW MEXICO 87401

PHONE (505) 632-0615

WASTE STABILIZATION FACILITY

SHEET: 1 DATE: 1/94

DRW: RMY PRJ MGR: RMY

# ENVIROTECH INC.

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

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

'93 NOV 5 AM 9 07

November 4, 1993

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

Re: Discontinued Maintenance Status of Landfarm Cells.  
Envirotech Soil Remediation Facility

Dear Ms. Brown:

This correspondence is to verify the November 3, 1993 telecommunications between you and Mr. Robert Young of Envirotech, Inc. regarding "Discontinued Maintenance Status" (DMS) classification of cells within Landfarm #1 and Landfarm #2, located at Envirotech Soil Remediation Facility (ESRF) Hilltop, New Mexico.

The following sampling plan is sufficient to provide representation of soil wastes located within cells in Landfarm #1 and Landfarm #2; to adequately classify cells as "DMS": One arbitrarily selected five-point composite soil sample per cell (approximately 100' X 100'), unless a block of cells is dedicated to a sole client and/or spill incident. In the scenario of a block of cells dedicated to a single client and/or spill incident, one representative five-point composite soil sample will be sufficient for the dedicated block. All soil samples will be taken from a midpoint depth, according to the total thickness of the soil lift.

Analysis of composite samples will be for benzene, toluene, ethylbenzene, and total xylenes (BTEX) per USEPA Method 8020, in addition to total recoverable petroleum hydrocarbons (TPH) per either USEPA Method 418.1 (modified for soil) or USEPA Method 8015 (modified). Representative composite samples containing benzene less than 10 mg/kg, total BTEX less than 50 mg/kg, and TPH less than 100 mg/kg will constitute classification of the tested cell or block of cells as "DMS".

Sampling documentation, cell and/or block information (ie. client(s), cell/block diagram with sample points identified), initial placement date, and analytical results will be provided to your office. Envirotech will continue maintenance of each sampled cell or block of cells, pending written notification from OCD to classify tested cells or block of cells as "DMS".

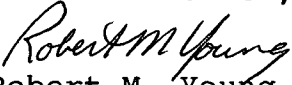
Treatment of DMS cells or blocks of cells will include the following:

- Discontinued Tilling.
- Discontinued Quarterly Monitoring.
- Optional re-seeding with native grasses (prerequisite to closure).
- Optional placement of additional contaminated soils, following permit guidelines, in a cell or block of cells, at which time, the "Discontinued Maintenance Status" of the cell is up-graded to an active cell.

"Discontinued Maintenance Status" does not represent closure of the cells or blocks of cells, which we understand may be petitioned for at a later date without additional sampling.

Thank you for your assistance in developing this sampling plan. We sincerely appreciate working with you on our landfarms.

Respectfully submitted,  
**ENVIROTECH, INC.**

  
Robert M. Young  
Environmental Biologist

DMS-OCD.LTR

cc: Mr. Denny Foust, NMOCD Aztec, NM office.  
File

RMV/rmy



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

August 23, 1993

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

**RE: ENVIROTECH INC. LANDFARM NO. 2 EXPANSION  
OCD RULE 711 PERMIT MODIFICATION APPROVAL**

Dear Mr. Young:

On August 17, 1993 the New Mexico Oil Conservation Division (OCD) approved the permit modification for expansion of your current soil remediation facility at landfarm No. 2. The approval letter stated that the facility was administratively approved pursuant to OCD Rule 711 by the Director on September 29, 1993, for a period of five (5) years and expires on September 29, 1997. The permit approval date of September 29, 1993 is incorrect. The correct date of approval is September 29, 1992. The expiration date of September 29, 1997 is correct.

I am sorry for any inconvenience that this may have caused you. If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office  
Ms. Ilyse Gold, BLM, Farmington



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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

November 16, 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-241-149**

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

**RE: APPROVAL OF DISCONTINUED MAINTENANCE STATUS  
ENVIROTECH LANDFARM NO. 1 & NO. 2  
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received your request dated November 4, 1993, for authorization to classify appropriate cells within Envirotech's Landfarm No. 1 and No. 2 as "Discontinued Maintenance Status" (DMS). Prior making a DMS classification, a cell will be sampled for the appropriate constituents and approval received from the OCD.

Based on the information provided in your request, the OCD hereby approves the classification of appropriate cells as DMS under the following conditions:

1. One composite sample will be taken per cell. If the soil in a block of cells is from the same point of origination then a composite sample from the block of cells may be taken with no block of cells being larger than 10 acres.
2. The sample will be analyzed for benzene, toluene, ethylbenzene, and total total xylenes (BTEX), and total petroleum hydrocarbons (TPH) using the appropriate USEPA methods. To classify a cell or block of cells as DMS the TPH will be less than 100 mg/l, the total BTEX will be less than 50 mg/l, and the benzene will be less than 10 mg/l.

Mr. Robert Young  
November 16, 1993  
Page 2

3. A written request with the appropriate analysis included will be submitted to the OCD Santa Fe Office and written approval received prior to classification of a cell as DMS.
4. DMS cells may have tilling and quarterly monitoring requirements discontinued as long as no contaminated soils are added to the cell. If any DMS cells are reopened then the tilling and quarterly monitoring requirements will again become effective.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters, or the environment actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

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

Sincerely,

A handwritten signature in cursive script, reading "Kathy M. Brown".

Kathy M. Brown  
Geologist

xc: Denny Foust, OCD Aztec Office



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

August 17, 1993

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-667-242-007**

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

**RE: ENVIROTECH INC. LANDFARM NO. 2 EXPANSION  
OCD RULE 711 PERMIT MODIFICATION APPROVAL**

Dear Mr. Young:

The New Mexico Oil Conservation Division (OCD) has received your May 14, 1993, request for a permit modification to expand your current soil remediation facility at landfarm No. 2. The commercial landfarm facility remediates oilfield contaminated solids which are either exempt from the Federal RCRA Subtitle C (hazardous waste) regulations or are "nonhazardous" by characteristic testing. The facility was administratively approved pursuant to OCD Rule 711 by the Director on September 29, 1993, for a period of five (5) years and expires on September 29, 1997. The permit modification is to expand the facility to the south and east an additional two-hundred and sixty-six (266) acres.

The permit modification for expansion of the Envirotech Inc. Commercial Landfarm No. 2 located in the SE/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico, is hereby approved in accordance with the OCD Rule 711. The modification application consists of the original application dated May 14, 1993, and the materials dated June 28, 1993, and July 26, 1993, submitted as amendments to the application. The construction, operation, monitoring and reporting of the expanded facility shall be as specified in the September 29, 1993 approval, the OCD correspondence dated March 12, 1992, and the following conditions:

May 14, 1993



Mr. Morris D. Young  
August 17, 1993  
Page 2

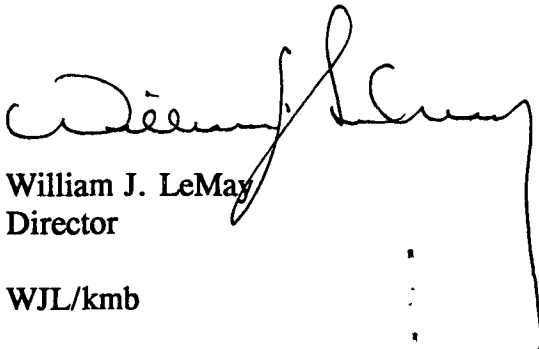
1. A fifty (50) foot buffer zone will be maintained around all pipelines and roadways crossing or running adjacent to the landfarm expansion area.
2. Prior to placing any contaminated soil in the expanded portion of the landfarm, one (1) background soil sample will be taken from the center portion of the expansion area, two (2) feet below the native ground surface. The sample will be analyzed for total petroleum hydrocarbons (TPH), volatile aromatic organics (BTEX), major cations/anions, and heavy metals using approved EPA methods.
3. There will be a physical separation maintained at all times between the OCD permitted site and any adjacent disposal/remediation facilities permitted by another regulatory agency. There will be no transfer or mixing of wastes between the OCD permitted landfarm and any other disposal/remediation facilities.

Please be advised approval of this facility expansion does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

The Division shall have the authority to administratively change this permit to protect fresh water, human health and the environment.

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

Sincerely,



William J. LeMay  
Director

WJL/kmb

xc: Denny Foust, OCD Aztec Office  
Ms. Ilyse Gold, BLM, Farmington

# ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

OIL CONSERVATION DIVISION  
RECEIVED

'93 AUG 2 AM 8 53

July 26, 1993

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

Dear Mr. Anderson:

As per your direction, Envirotech Inc. will no longer accept non-oilfield related wastes for remediation at our NMOCD permitted facilities.

We have been in contact with Ms. Marcy Leavitt, Program Manager of the Ground Water Section of NMED and have requested a Discharge Permit for a parcel of property near, but not adjoining our present NMOCD facilities. This permit would allow us to operate a soil remediation facility under the direction of the NMED, thus keeping oilfield and non oilfield originating hydrocarbon soils separate.

Ms. Leavitt requested a letter from NMOCD stating NMOCD's experience with Envirotech's operation of our NMOCD permitted facilities, and whether we have a history of operating in accordance with the permit requirements. Such a letter will facilitate the permitting process review.

We respectfully request your office provide such a letter either directly to Ms. Leavitt's attention or to Envirotech so that we may forward it to her. Ms. Leavitt's address is:

Marcy Leavitt, Program Manager  
Ground Water Section  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87503

We appreciate working with you and your staff.

Sincerely,

*Morris D. Young*

Morris D. Young  
President  
MDY/cj209

CC: Marcy Leavitt - NMED

# ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

July 26, 1993

Ms. Marcy Leavitt, Program Manager  
Ground Water Section  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, New Mexico 87503

Dear Ms. Leavitt,

It was a pleasant surprise to hear you are the Discharge Permit Program Manager with the Ground Water Section. I'm sure your presence back at NMED has been greatly appreciated since your sabbatical.

As discussed in our telephone conversation, Envirotech requests a Discharge Permit for a parcel of property 13 miles south of Bloomfield, New Mexico to allow remediation of LUST soils. This site is located on a high mesa where groundwater is over 1000 feet deep and the closest residence is about 4 miles distant. The site abutts Highway 44, is relatively level and physically separated from the NMOCD soil remediation permitted facilities we operate.

Although no discharge will occur from the property, we request a Discharge Permit which will bring us directly under the oversight of the NMED in the daily operation of this facility.

Please find attached our permit application in duplicate and the filing fee of \$50.00.

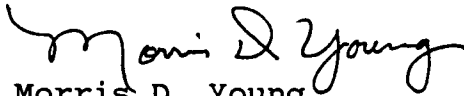
As you are aware, until July 19, 1993, LUST soils were accepted at our NMOCD remediation facilities. A legal challenge to NMOCD'S authority to allow any non-oilfield wastes into their rule 711 permitted facilities has resulted in the NMOCD declining to accept any LUST soils until the issue is resolved in the court system.

We have requested Mr. Roger Anderson, Bureau Chief NMOCD, to write a letter to your attention stating NMOCD's experience with Envirotech in operating our permitted facilities in accordance with permit conditions. He has indicated such a letter would be forth coming.

Envirotech requests a 120 day Temporary Discharge Permit to allow time to process this Discharge Permit application. This temporary permit will be in the best interest of the health and welfare of the people of the State of New Mexico to allow proper receipt and handling of LUST soils in a regulated and controlled facility.

Your immediate attention to this request will be greatly appreciated.

Sincerely,

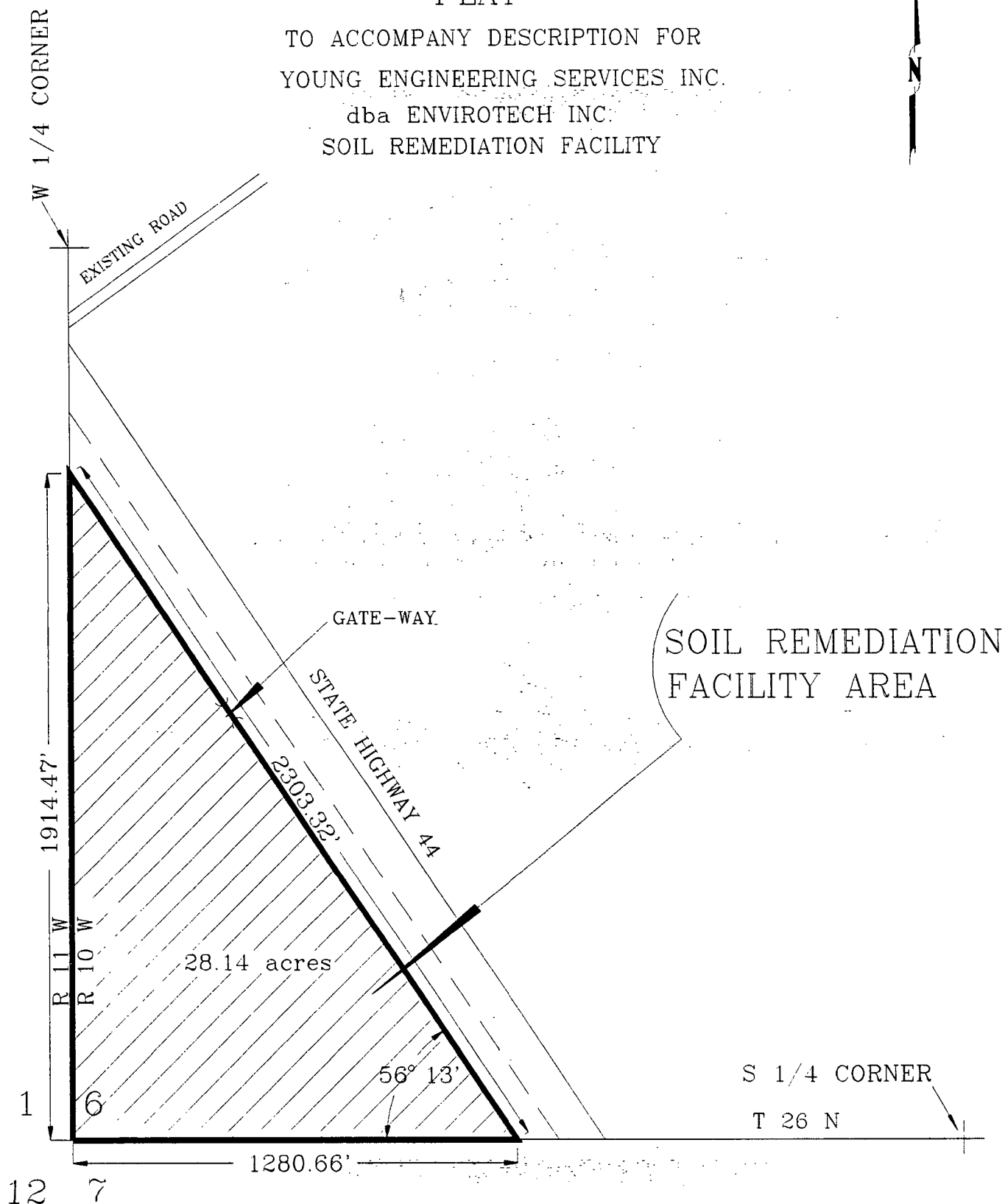


Morris D. Young  
President  
MDY/cj210

✓ CC: Mr. Roger Anderson - NMOCD

PLAT  
TO ACCOMPANY DESCRIPTION FOR  
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY

N



YOUNG ENGINEERING INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY AREA

Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SOUTHWEST CORNER OF SAID SECTION 6 AND RUNNING THENCE ALONG THE WEST LINE OF SAID SECTION 6, NORTH 1914.47 FEET TO A POINT ON THE WEST LINE OF SECTION 6; THENCE SOUTH 33° 47' EAST 2303.32 FEET TO THE SOUTHERN LINE OF SECTION 6; THENCE WEST ALONG THE SOUTHERN LINE OF SECTION 6 TO THE SOUTHWEST CORNER OF SAID SECTION 6, MORE OR LESS TO THE POINT OF BEGINNING.

THE TRACT CONTAINS APPROXIMATELY 28.14 ACRES AND BORDERS THE WEST RIGHT-OF-WAY FOR STATE HIGHWAY 44.

# ENVIROTECH<sup>®</sup> INC.

UNDERGROUND TANK TESTING • OIL SPILL INVESTIGATION • DIVISION  
SITE ASSESSMENT • SITE REMEDIATION  
RECEIVED

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

'93 AUG 2 AM 8 53

July 26, 1993

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

Re: Modification of Application  
Expansion of Soil Remediation Facility No. 2  
Section 6, T. 26 N., R. 10 W.  
San Juan County, New Mexico

Dear Mr. LeMay:

Young Engineering dba, Envirotech Inc., has requested expansion of our rule 711 Soil Remediation Facility No. 2. An application was mailed to your attention April 2, 1993 and public notice was made April 16, 1993.

Notification of a change in policy by NMOCD to not accept non oilfield wastes at NMOCD permitted facilities prompts us to request modification of our permit application by withdrawing the south west 28 acres of the proposed expansion area. This area is physically divided by Highway 44 from the rest of the property.

Attached please find a revised plat and legal description of the area we desire for inclusion in the expansion area. Please substitute this plat and description which is for a total of approximately 266 acres in the place of the original area submitted.

We appreciate the help you and your staff have been on the application.

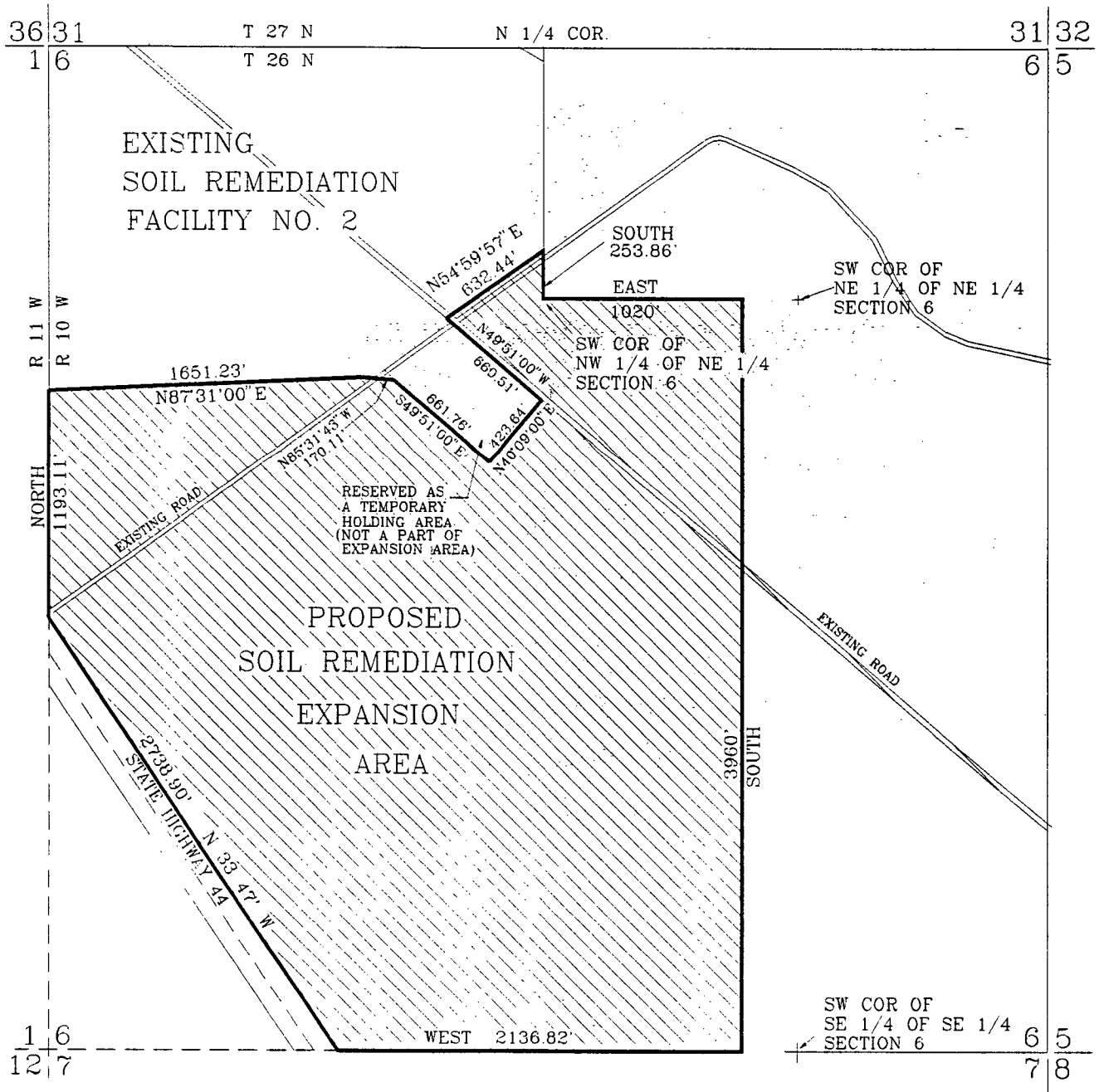
Sincerely,

*Morris D. Young*  
Morris D. Young  
President  
MDY/cj208

Enclosures:



PLAT  
TO ACCOMPANY DESCRIPTION FOR  
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA



YOUNG ENGINEERING INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA

Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SOUTHWEST CORNER OF SAID SECTION 6 AND RUNNING THENCE ALONG THE WEST LINE OF SAID SECTION 6 TO THE BEGINNING CORNER OF THE PROPERTY BOUNDARY, NORTH 2276.89 FEET; THENCE 1193.11 FEET NORTH ALONG THE WEST BOUNDARY OF SECTION 6 TO THE SOUTHWEST CORNER OF THE EXISTING SOIL REMEDIATION FACILITY NO. 2; THENCE NORTH 87° 31' EAST 1651.23 FEET TO THE SOUTHEASTERLY CORNER OF THE SAID FACILITY NO. 2; THENCE SOUTH 85° 31' 43" EAST 170.11 FEET TO THE MOST WESTERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE SOUTH 49° 51' EAST 661.76 FEET TO THE MOST SOUTHERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE NORTH 40° 09' EAST 423.64 FEET TO THE MOST EASTERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE NORTH 49° 51' WEST 660.51 FEET TO THE MOST NORTHERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE ALONG THE BOUNDARY OF SAID FACILITY NO. 2 NORTH 54° 59' 57" EAST 632.44 FEET MORE OR LESS TO A POINT ON THE NORTH-SOUTH CENTERLINE OF SAID SECTION 6; THENCE ALONG SAID CENTER-LINE, SOUTH 253.86 FEET TO THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 6; THENCE EAST 1020 FEET MORE OR LESS ALONG THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST 1/4 OF SAID SECTION 6, THENCE SOUTH 3960 FEET MORE OR LESS TO THE SOUTHLINE OF THE SOUTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SAID SECTION 6; THENCE WEST ALONG THE SOUTH LINE OF SAID SECTION 6 2136.82 FEET; THENCE NORTH 33° 47' WEST 2738.90 FEET TO THE WEST LINE OF SAID SECTION 6, MORE OR LESS TO THE POINT OF BEGINNING.

THE TRACT CONTAINS APPROXIMATELY 266.3 ACRES AND NO RIGHT-OF-WAY, EASEMENTS, RESTRICTIONS OR RESERVATIONS WERE RESEARCHED OR SHOWN.

# ENVIROTECH<sup>●</sup> INC.

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

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

'93 JUN 30 AM 9 02

June 28, 1993

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

RE: Modification of Application  
Expansion of Soil Remediation Facility No. 2  
Section 6, T. 26 N., R. 10 W.  
San Juan County, New Mexico

Dear Mr. LeMay:

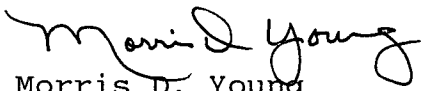
Young Engineering dba, Envirotech, Inc., has requested expansion of our rule 711 Soil Remediation Facility No. 2. An application was mailed to your attention April 2, 1993 and public notice was made April 16, 1993.

As per our May 14, 1993 correspondence, the BLM has made us aware of an Anasazi road that crosses the original proposed expansion area. We modified our requested area to exclude the road area. BLM archeologists now request we move the eastern border an additional 300 feet west to provide a buffer zone for any archeological sites that may be connected with the road system.

Please substitute this plat and legal description which is for a total of 303 acres in the place of the previous application for 495 acres.

We appreciate working with you and your staff on this matter.

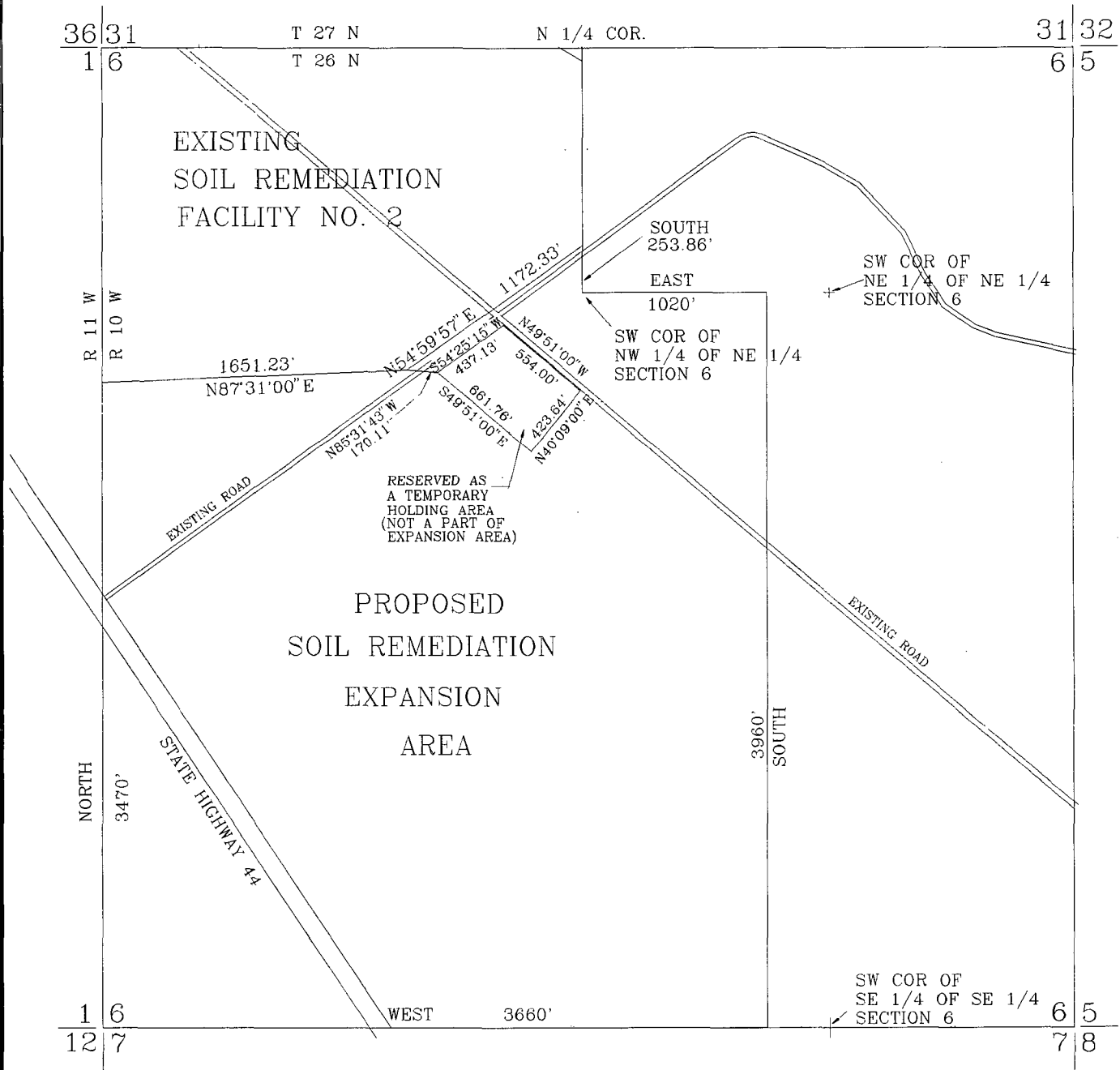
Sincerely,

  
Morris D. Young  
President

cc: Mr. Mike Pool, District Manager, BLM, Farmington Resource Area  
Ms. Ilyse Gold, Environmental Coordinator, BLM, Farmington

PLAT

TO ACCOMPANY DESCRIPTION FOR  
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA



YOUNG ENGINEERING INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA

Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SOUTHWEST CORNER OF SAID SECTION 6 AND RUNNING THENCE ALONG THE WEST LINE OF SAID SECTION 6, NORTH 3470.0 FEET TO THE SOUTHWEST CORNER OF THE EXISTING SOIL REMEDIATION FACILITY NO. 2; THENCE NORTH 87 31' EAST 1651.23 FEET TO THE SOUTHEASTERLY CORNER OF THE SAID FACILITY NO. 2; THENCE SOUTH 85 31' 43" EAST 170.11 FEET TO THE MOST WESTERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE ALONG THE HOLDING AREA BOUNDARY THE FOLLOWING FOUR (4) COURSES AND DISTANCES: 1.) SOUTH 49 51' EAST 661.76 FEET; 2.) NORTH 40 09' EAST 423.64 FEET; 3.) NORTH 49 51' WEST 554.00 FEET AND 4.) SOUTH 54 25' 15" WEST 437.13 FEET; THENCE NORTH 85 31' 43" WEST 170.11 FEET TO THE SOUTHEASTERLY CORNER OF SAID FACILITY NO. 2; THENCE ALONG THE BOUNDARY OF SAID FACILITY NO. 2 NORTH 54 59' 57" EAST 1172.33 FEET MORE OR LESS TO A POINT ON THE NORTH-SOUTH CENTERLINE OF SAID SECTION 6; THENCE ALONG SAID CENTERLINE, SOUTH 253.86 FEET TO THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 6; THENCE EAST 1020 FEET MORE OR LESS ALONG THE NORTH LINE OF THE SOUTHWEST QUARTER OF THE NORTHEAST 1/4 OF SAID SECTION 6, THENCE SOUTH 3960 FEET MORE OR LESS TO THE SOUTHLINE OF THE SOUTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SAID SECTION 6, TO A POINT ON THE SOUTH LINE OF SAID SECTION 6; THENCE ALONG THE SOUTH LINE OF SAID SECTION 6, WEST 3660 FEET MORE OR LESS TO THE POINT OF BEGINNING.

THE TRACT CONTAINS APPROXIMATELY 303 ACRES AND NO RIGHT-OF-WAY, EASEMENTS, RESTRICTIONS OR RESERVATIONS WERE RESEARCHED OR SHOWN.



## MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone☐ PersonalTime  
2:45 P.M.Date  
5/25/93Originating PartyOther PartiesIllyse Gold - BLM Farmington  
327-5344Kathy Brown  
OCDSubject

Envirotech Expansion

BLM's opinion on the Amended Expansion  
Chaco "Great North Road" Buffer zone.Discussion

The BLM appreciates Morris Young's cooperation & amendment to the expansion (5/14/93), but they have additional requests based on the May 19, 1993 Interagency Management Group (IMG) meeting in Albuquerque. The BLM wants to see a 400'-600' buffer zone from the center line of the "Great North Road" (GNR). In the amended plan the GNR is to the east of the new border and it has a 96' buffer at the south end & a 183' buffer at the north end (see attachment).

Told Illyse that we would need a written request from the BLM recommending a larger buffer zone ~~to~~ to justify reducing the proposed expansion. I recommended that she

Conclusions or Agreements

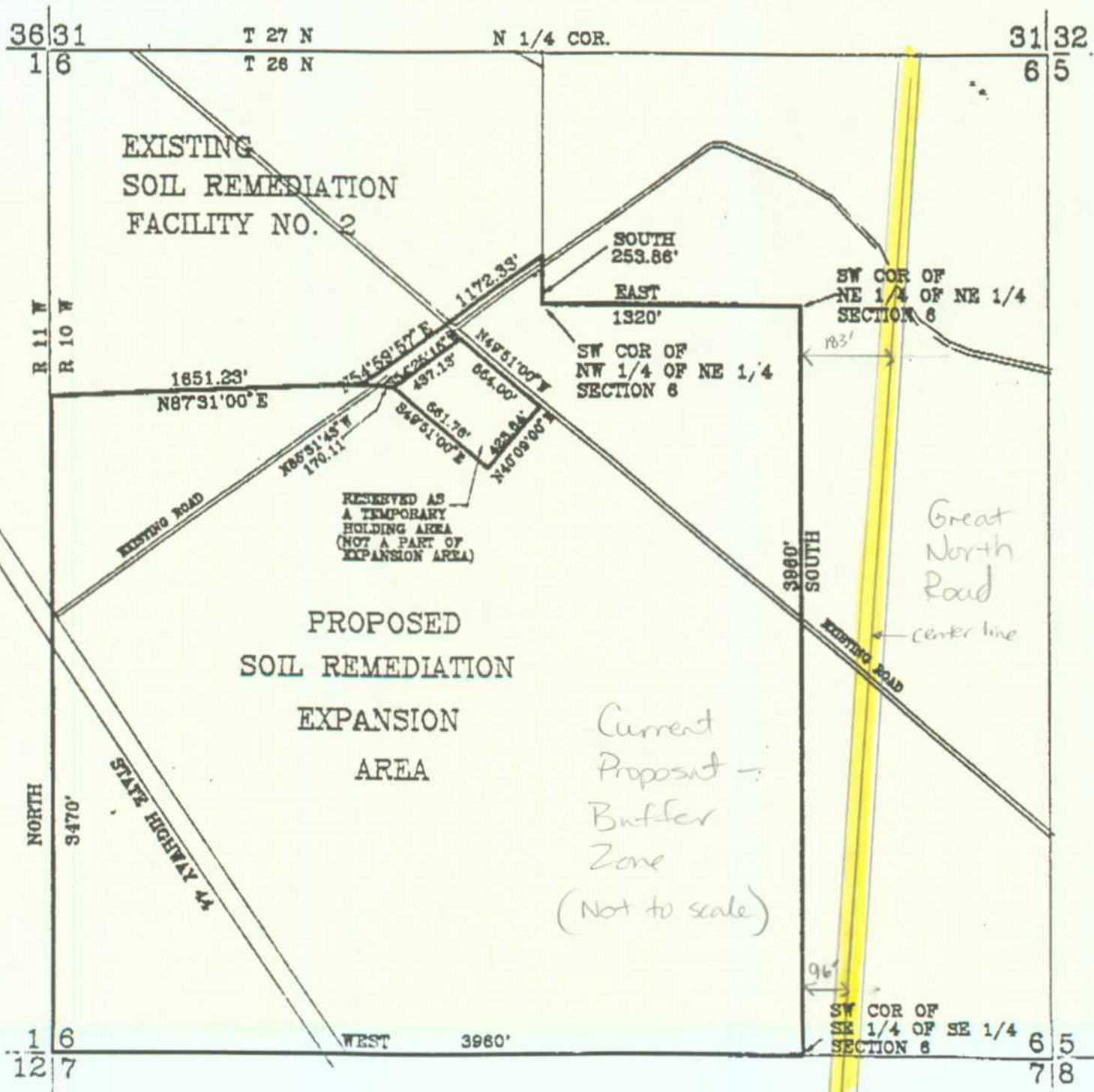
work with Morris on this to come up with a plan that they both can live with.

Distribution

Signed

Kathy Brown

PLAT  
TO ACCOMPANY DESCRIPTION FOR  
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY NO. 2 EXPANSION AREA



# ENVIROTECH<sup>●</sup> INC.

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

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

'93 MAY 17 AM 9 53

*P. J. S.*

May 14, 1993  
Certified Mail  
Return Receipt P 137 699 867

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

RE: Expansion of Soil Remediation Facility No. 2  
Section 6, T. 26 N., R. 10 W.  
San Juan County, New Mexico

Dear Mr. LeMay:

Young Engineering dba, Envirotech, Inc., has requested expansion of our rule 711 Soil Remediation Facility No. 2. Application was mailed to your attention April 2, 1993 and public notice was made April 16, 1993. Subsequently, we have become aware of a archeological and/or culturally significant road that crosses the eastern portion of the proposal expansion area. This is believed to be a road connecting Chico Ruins with Salmon Ruins near Bloomfield, New Mexico.

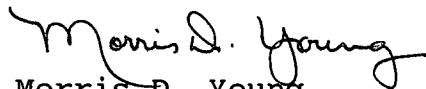
In order to assure preservation of this road, we request you allow us to withdraw the effected area from our permit application. Attached, please find a plat and a legal description of the area we desire to retain in our permit application.

Please substitute this plat and legal description which is for a total of 330 acres in the place of the previous application for 495 acres.



We appreciate working with you and your staff on this matter.

Sincerely,

  
Morris D. Young  
President

cc: Mr. Mike Pool, District Manager, BLM, Farmington Resource Area  
Ms. Ilyse Gold, Environmental Coordinator, BLM, Farmington



YOUNG ENGINEERING INC.  
dba ENVIROTECH INC.  
SIOL REMEDIATION FACILITY NO. 2 EXPANSION AREA

Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SOUTHWEST CORNER OF SAID SECTION 6 AND RUNNING THENCE ALONG THE WEST LINE OF SAID SECTION 6, NORTH 3470.0 FEET TO THE SOUTHWEST CORNER OF THE EXISTING SOIL REMEDIATION FACILITY NO. 2; THENCE NORTH 87 31' EAST 1651.23 FEET TO THE SOUTHEASTERLY CORNER OF THE SAID FACILITY NO. 2; THENCE SOUTH 85 31' 43" EAST 170.11 FEET TO THE MOST WESTERLY CORNER OF THE TEMPORARY HOLDING AREA; THENCE ALONG THE HOLDING AREA BOUNDARY THE FOLLOWING FOUR (4) COURSES AND DISTANCES: 1.) SOUTH 49 51' EAST 661.76 FEET; 2.) NORTH 40 09' EAST 423.64 FEET; 3.) NORTH 49 51' WEST 554.00 FEET AND 4.) SOUTH 54 25' 15" WEST 437.13 FEET; THENCE NORTH 85 31' 43" WEST 170.11 FEET TO THE SOUTHEASTERLY CORNER OF SAID FACILITY NO. 2; THENCE ALONG THE BOUNDARY OF SAID FACILITY NO. 2 NORTH 54 59' 57" EAST 1172.33 FEET MORE OR LESS TO A POINT ON THE NORTH-SOUTH CENTERLINE OF SAID SECTION 6; THENCE ALONG SAID CENTERLINE, SOUTH 253.86 FEET TO THE SOUTHWEST CORNER OF THE NORTHWEST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 6; THENCE EAST 1320 FEET MORE OR LESS TO THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 6, THENCE SOUTH 3960 FEET MORE OR LESS TO THE SOUTHWEST CORNER OF THE SOUTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SAID SECTION 6, ALSO BEING A POINT ON THE SOUTH LINE OF SAID SECTION 6; THENCE ALONG THE SOUTH LINE OF SAID SECTION 6, WEST 3960 FEET MORE OR LESS TO THE POINT OF BEGINNING.

THE TRACT CONTAINS APPROXIMATELY 330 ACRES AND NO RIGHT-OF-WAY, EASEMENTS, RESTRICTIONS OR RESERVATIONS WERE RESEARCHED OR SHOWN.



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Farmington District Office  
1235 La Plata Highway  
Farmington, New Mexico 87401

RECEIVED

93 MAY 24 AM 9 31

IN REPLY REFER TO:

4331-01 (070)

MAY 20 1993

Mr. William J. LeMay, Director  
Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
P.O. Box 2088  
State Land Office Building  
Santa Fe, NM 87504

Dear Mr. LeMay:

The Bureau of Land Management, Farmington District Office requests this opportunity to comment and express concerns appertaining to the proposed expansion of the soil remediation facility operated by Young Engineering Services, dba Envirotech Inc. in northwest New Mexico. The Farmington District Office (FDO) applauds the progressive technology demonstrated by Envirotech Inc. and recognizes the need for such a facility to assist with the remediation of contaminated soil associated with the production of oil and gas. An expanded need for a soil remediation facility is anticipated with the implementation of the pit closure policy and associated required remediation. However, the area proposed for expansion and the immediate surrounding vicinity contains significant cultural and recreation resources that result in substantial concerns about the proposal (see enclosed map).

Within the proposed expansion area lies approximately 4300 feet of the prehistoric Chaco "Great North Road". This road was built and used during the late 11th and early 12th centuries as a route of travel between the Anasazi inhabitants of Chaco Canyon and the "outlier" sites such as Aztec Ruin and Salmon Ruin. Along the "Great North Road" other "outliers" are known to exist and are associated with the Road. Chaco Canyon and the "outliers" along the "Great North Road" are listed on the UNESCO World Heritage List. The Chacoan Roads are typically up to 30 feet wide and are often associated with stairs, shrines, ramps and other architecture. Research on the "Great North Road" in the area of the proposed expansion has been limited to interpretation of aerial imagery. No detailed survey of the Road in this area has been taken. Aerial photography of section 6 T. 26 N., R. 10 W. clearly shows the location of the Road. Within the proposed expansion area, the Road is identifiable by a sand dune with a distinctive notch or swale with an associated architectural feature. Two other road related features are also known to exist in the north portion of section 6 in Kutz Canyon, as the Road makes its way to the outlier of Twin Angels. Portions of the Road in section 6 are under consideration by the FDO for interpretive use associated with the recreation area. So few sections of the Chaco Roads have been studied in detail that numerous questions remain concerning their origins, engineering, dates of use, association with other archaeological sites and the cultural behavior associated with them. The "Great North Road" is a significant cultural resource exemplified by the fact that the Interagency Management Group (IMG), representing the Secretary of the Interior on issues relating to Chaco Protection Sites, has a "Roads" committee to monitor the research and management of the Chaco Roads. Although not listed, the "Great North Road" meets the criteria for listing on the National Register of Historic Places. That portion of the Road within the proposed expansion area if properly studied, could substantially contribute to furthering understanding this unique phenomenon.

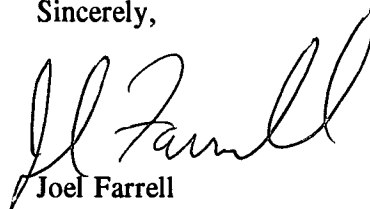
Adjacent to and overlapping the proposed expansion area is the Bureau of Land Management Angel Peak Recreation Area. This recreation area is frequently used by the public for sightseeing, picnicking and camping. The proposal would create a significant eyesore for the first 10% of the rim drive and isolate the Sage Picnic Area. Within the recreation area, a cultural interpretative site is proposed. Interpretation of the herradura related to the "Great North Road" and associated notch to the southeast is planned. The view of the Road from the recreation site would be obliterated if the expanded remediation facility is approved. The United States holds a perpetual exclusive easement for that portion of section 6 associated with Angel Peak Recreation Area (see enclosure). Because this road is utilized by the public, often sightseeing, safety is a prime consideration. Heavy truck traffic would increase the chances for an accident with the United States being liable.

The proposal, as mapped extends over the lip of Kutz Canyon. It is assumed that remediation would not take place over or near the canyon edge. Adequate berming would be necessary to assure that migration induced by thunderstorms or snow-melt would not flow into the canyon.

Mr. Young of Envirotech Inc. has been in consultation with the FDO on the concerns discussed above. Envirotech has indicated their commitment to preserve the resources of the area with an amendment to their original NMOCD application. This amendment is to exclude the Angel Peak Recreation Area and the areas of cultural resource concern. The FDO requests that the amended application also include considerations for an adequate buffer for the cultural resources of the Great North Road and all associated features. The FDO proposes that the extent of this buffer be recommended by the IMG. This subject will be an item of discussion at the May 19, 1993 IMG meeting in Albuquerque.

The FDO appreciates the cooperation of the NMOCD and of Mr. Young of Envirotech Inc. on the protection of these important resources. The FDO has discussed with Envirotech Inc. a land exchange to bring these resources into Federal ownership. Please contact myself or Ilyse Gold of my staff at (505) 327-5344 for any further discussion of this issue.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joel Farrell", is written over a horizontal line.

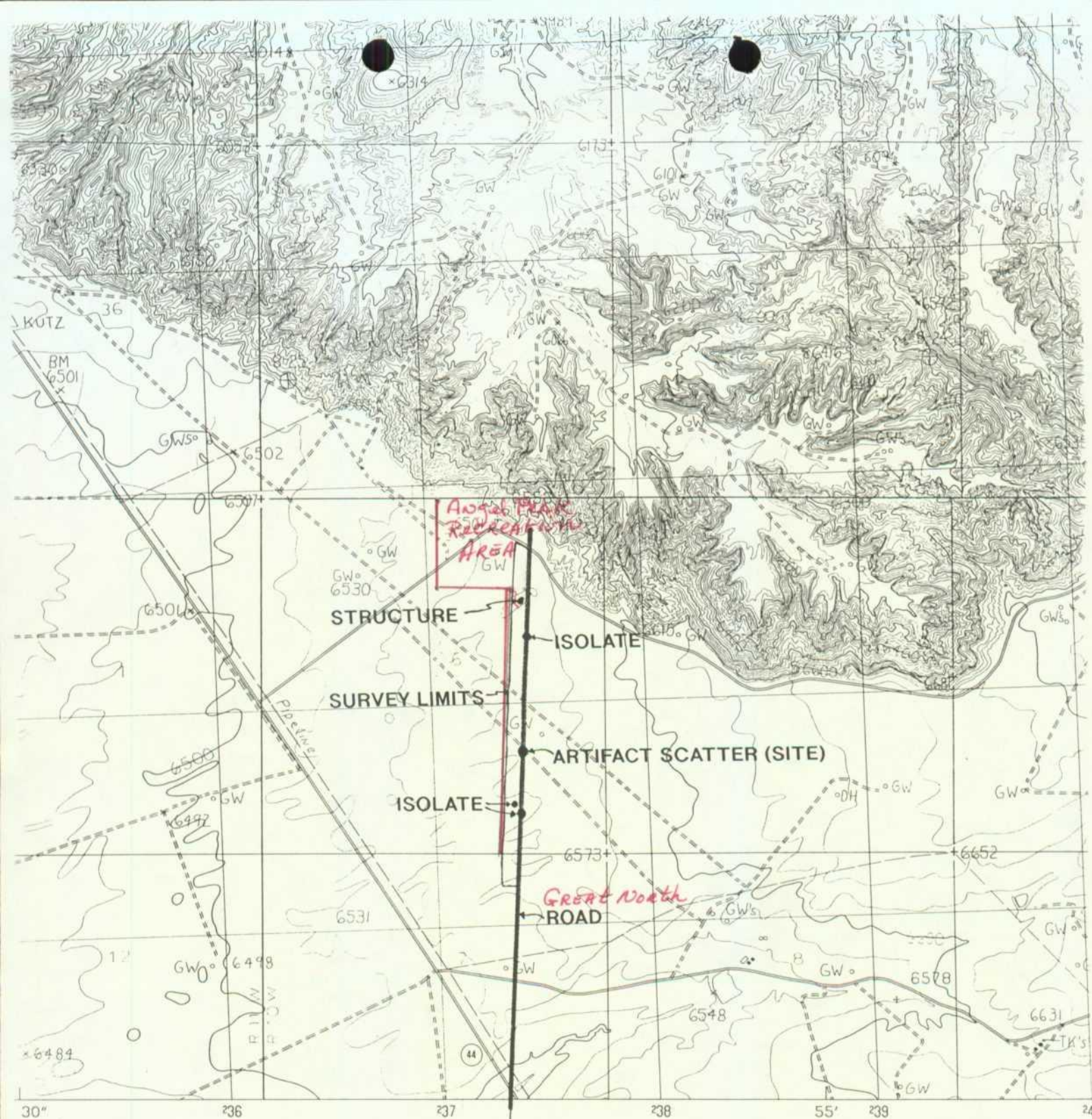
Joel Farrell  
Assistant District Manager  
for Resources

1 Enclosure

cc:

Morris Young, Envirotech Inc.





SCALE 1:24 000



CONTOUR INTERVAL 20 FEET

# EAST FORK KUTZ CANYON

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092



1	2	3	1 Horn
			2 Bloor
			3 Blam
4		5	4 Galle
			5 Huerf
			6 Carr
			7 Huerf
6	7	8	Post
			8 Huerf

ADJOINING 7.5 QUADRAN

## **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 Commission Regulations, the following application to modify a commercial surface waste disposal facility have 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:

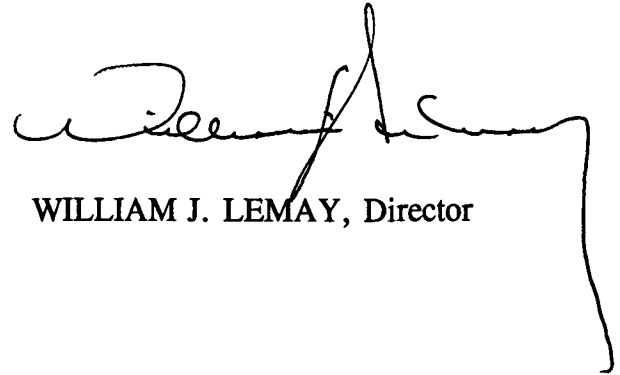
**Envirotech Inc., Morris D. Young, President, 5796 U.S. Highway 64 - 3014, Farmington, New Mexico 87401, has submitted an application to modify their previously approved commercial landfarm facility located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility currently remediates RCRA exempt and characteristically non-hazardous hydrocarbon contaminated soils by spreading them on the ground surface in 12 inch lifts or less and periodically disking them to enhance biodegradation of contaminants. The modification proposes to expand the facility to the south and east an additional 495 acres. The modification also proposes to construct unlined pits to accept drilling mud which would be dried and then moved onto the land farm to be remediated. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.**

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 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico,  
on this 16th day of April, 1993.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read 'William J. Lemay', with a long, sweeping vertical line extending downwards from the end of the signature.

WILLIAM J. LEMAY, Director

S E A L



# ENVIROTECH INC.

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

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

OIL CONSERVATION DIVISION  
RECEIVED

'93 APR 7 AM 9 02

April 2, 1993  
Certified Mail  
Retrun Receipt P 137 699 870

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

RE: Expansion of Soil Remediation Facility No. 2  
Section 6, T. 26 N., R. 10 W.  
San Juan County, New Mexico

Dear Mr. LeMay:

Young Engineering Services dba, Envirotech, Inc., currently operates Soil Remediation Facility No. 2 in the Northwest 1/4 of Section 6, Township 26 North, Range 10 West N.M.P.M., San Juan County, New Mexico. This facility is operated under permit granted September 29, 1992 by the New Mexico Oil Conservation Division (NMOCD) under OCD Rule 711. The NMOCD is the supervisory agency providing direction and routine inspection of the facility.

Envirotech's current facility consists of approximately 100 acres that are fenced and bermed to provide a secure location. Within the enclosure, we thin spread oil field hydrocarbon contaminated soils for remediation. The property is located approximately 14 miles south of Bloomfield, New Mexico, off State Highway 44, in San Juan County.

With the pending implementation of the Expansion of the Vulnerable Area as per NMOCD Case No. 10436, numerous producers continue to approach Envirotech to determine if our facility would be able to accept the contaminated soils they anticipate generating as a result of closure of earthen production pits throughout the San Juan Basin. In order to facilitate the demand, we have purchased additional private property to expand our facility.

The proposed expansion area adjoins our facility, (on the south and east) that was approved September 29, 1992. The proposed expansion area encompasses 495 acres in Section 6, Township 26 North, Range 10 West, N.M.P.M. The property is part of a 1118.14 acre purchase from Chevron U.S.A. Inc. purchased by Morris D. Young personally.

The property is undeveloped ranch land that is uniquely suited for thin spread soil remediation. As per the attached AREA/PROPERTY OWNERSHIP MAP, the site is bounded on all sides by either Bureau of Land Management administered land or land owned by Morris D. Young. Attached please find a copy of Envirotech's notification to the Bureau of Land Management's Farmington, New Mexico, District Office of this application to expand Soil Remediation Facility No. 2. This notice was sent certified mail April 1, 1993.

The property is relatively plainer with a gentle slope to the west. State Highway 44 provides year round access to the property. The site is remote from any population except for a mobile home occupied by an employee of the rancher, who is currently leasing a portion of the property for grazing on a month to month basis. Groundwater is estimated to be greater than 1,000 feet below ground surface. The only water well within ten miles of the site, according to the records of the New Mexico State Engineers Office, is located at the Thriftway Convenience Store approximately two miles to the northwest. This well is completed in the Ojo Alamo formation. Top perforations are reported to be at 1,220 feet below ground surface.

The entire soil remediation site will be bermed and fenced. There is little or no drainage to the property. A five-foot high earthen berm with a 2:1 slope will ensure positive containment on-site of any storm waters. Normal annual precipitation at the site is approximately 9 1/2 inches. A five strand barbed wire fence will be placed at the outside toe of the berm to prevent encroachment onto the site of any livestock. All gates will be locked except during business hours to prevent unauthorized entry to the facility.

Envirotech's remediation site operating personnel are 40 hour OSHA trained for Hazardous Material Handling and Site Investigation as well as 24 hour State of New Mexico Mine Safety and Health Administration (MSHA) trained.

The proposed expansion area exhibits the same positive site characteristics that makes our existing facility situated in the best possible location to efficiently and effectively remediate hydrocarbon contaminated soils without impacting the groundwater and/or the health safety and welfare of the population of the San Juan Basin.

As part of this expansion request, Envirotech also requests permission to set up drilling mud receiving pits. The drilling mud will be received in these shallow pits, dried and moved onto the land farm to be remediated. Initially we anticipate construction

OCD Expansion Request  
Envirotech, Inc.  
April 1, 1993

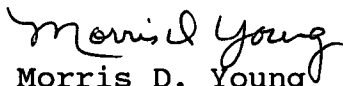
Page 3

of two of the six pits proposed. Any free water that separates from the mud will be removed from the pits and disposed of in an approved manor. The proposed location of the drilling mud receiving pits is shown on the attached Plot Plan.

We have reserved a five acre site as shown on the accompanying Plot Plan for a temporary holding area to place any exempt soils in the event that they may not have complete paperwork accompanying the material when it arrives at the remediation facility. This area will accommodate the holding of this exempt material outside of the permitted facility until all requirements for proper receipt have been satisfied.

Your immediate attention to this application is appreciated. If we can provide any additional information or in any way be helpful please contact us.

Sincerely,

  
Morris D. Young  
President

# ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

April 2, 1993  
Certified Mail  
Return Receipt No. \_\_\_\_\_

Mr. Mike Pool  
District Manager  
United States Department of the Interior  
Bureau of Land Management  
Farmington Resource Area  
1235 La Plata Highway  
Farmington, NM 87401

Dear Mr. Pool:

Young Engineering Services, dba Envirotech, Inc. operates a soil remediation facility in Section 6, Township 26 North, Range 11 West. This facility is permitted under Rule 711 by the New Mexico Oil Conservation Division (NMOCD). The NMOCD regulates and provides oversight of the daily operation of this facility.

As per the attached permit dated September 29, 1993, this soil remediation facility is authorized to accept only non-hazardous oilfield soils for remediation. Received soils are thin spread on the land surface and disk plowed every 2 weeks to enhance biodegradation and photodegradation of any contained hydrocarbon material. The process is continued until the soils are totally remediated to NMOCD standards.

The site is securely fenced and locked to prevent livestock or unauthorized persons from entering the facility. We have also constructed a 5 foot earthen berm around the entire facility perimeter to prevent any storm run-off or migration of soils off-site.

Groundwater in this area is greater than 1,000 feet below the ground surface. The only water well on record with the New Mexico State Engineer's Office is located at the Thriftway Convenience Store on the west side of U.S. Highway 44.

Envirotech currently has an application pending with the NMOCD to expand this facility to include additional acreage in Section 6, Township 26 North, Range 11 West. As per the attached AREA/PROPERTY OWNERSHIP MAP, Bureau of Land Management property

BLM  
Envirotech, Inc.  
March 31, 1993

Page 2

adjoins this proposed expansion area on all sides except where it abuts the soil remediation facility or fee land owned by Morris D. Young.

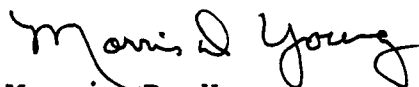
This geographic area provides a unique site remote from any population in an area where groundwater will not be impacted. All weather access is provided by U.S. Highway 44 and the site is surrounded by the oil/gas fields we serve.

In accordance with Section B, Rule 711, the NMOCD will issue public notice of this application to expand the soil remediation facility. Any person seeking to comment on the application must file comments with the NMOCD within 30 days of the date of public notice.

We feel this facility expansion is urgently required to facilitate closure of unlined earthen production pits which will protect the groundwater resources of the San Juan Basin. Furthermore, we feel we operated our facility in a responsible manor that mitigates any environmental and/or commercial impact on the adjoining property owners.

Many BLM personnel, including several members of the Farmington District have visited our facility and are familiar with our operation. We specifically request you visit this facility to inspect its operation and procedures to assure the district that the facility will be a positive factor providing an environmentally sound approach to protecting the groundwater resource of the San Juan Basin. Please contact Morris D. Young whenever your schedule would permit you to visit the facility.

Sincerely,



Morris D. Young  
President

CC: Mr. William J. LeMay  
Director NMOCD

enclosure

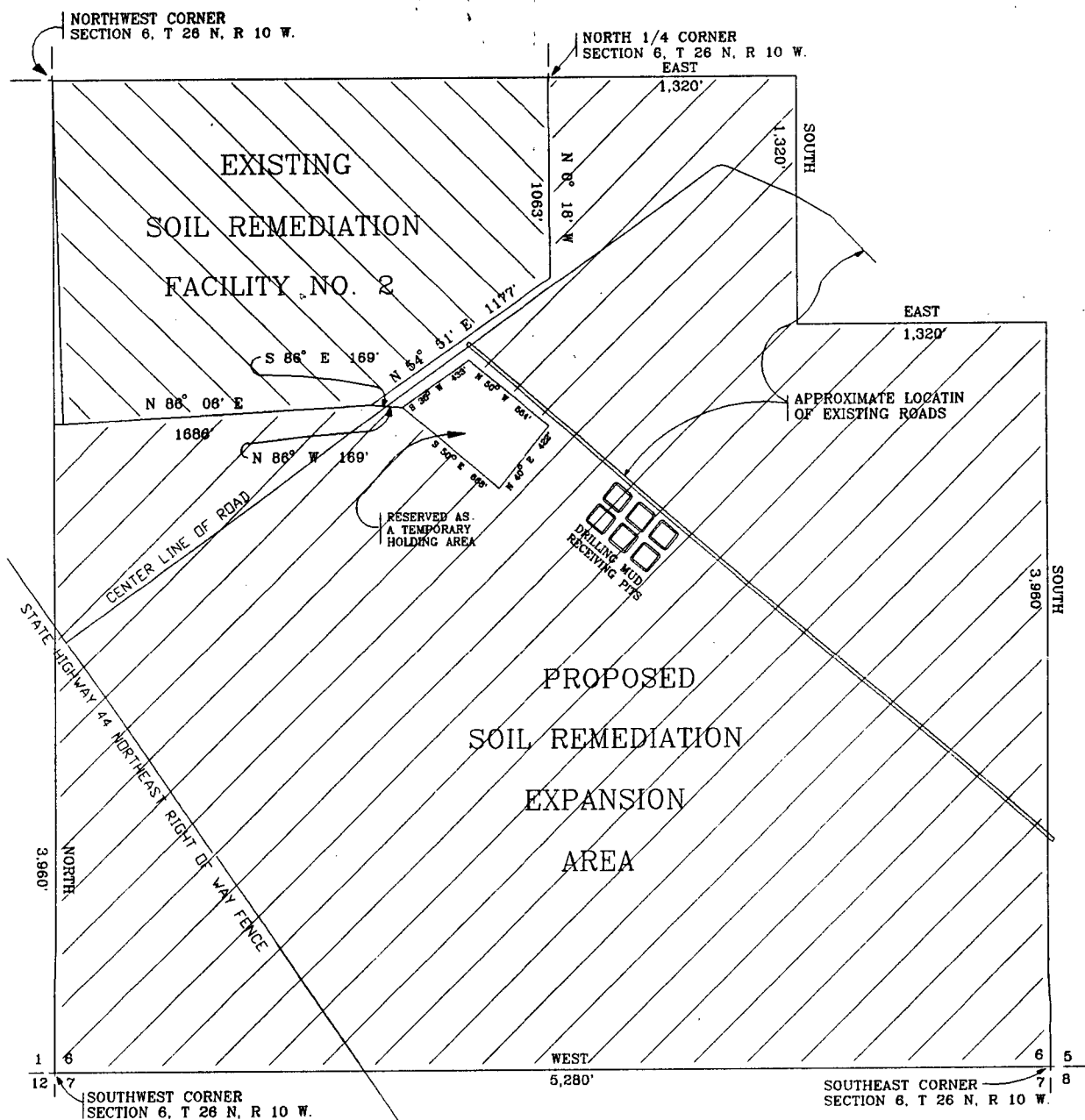
YOUNG ENGINEERING SERVICES INC.  
dba ENVIROTECH INC.  
SOIL REMEDIATION FACILITY No. 2 EXPANSION AREA

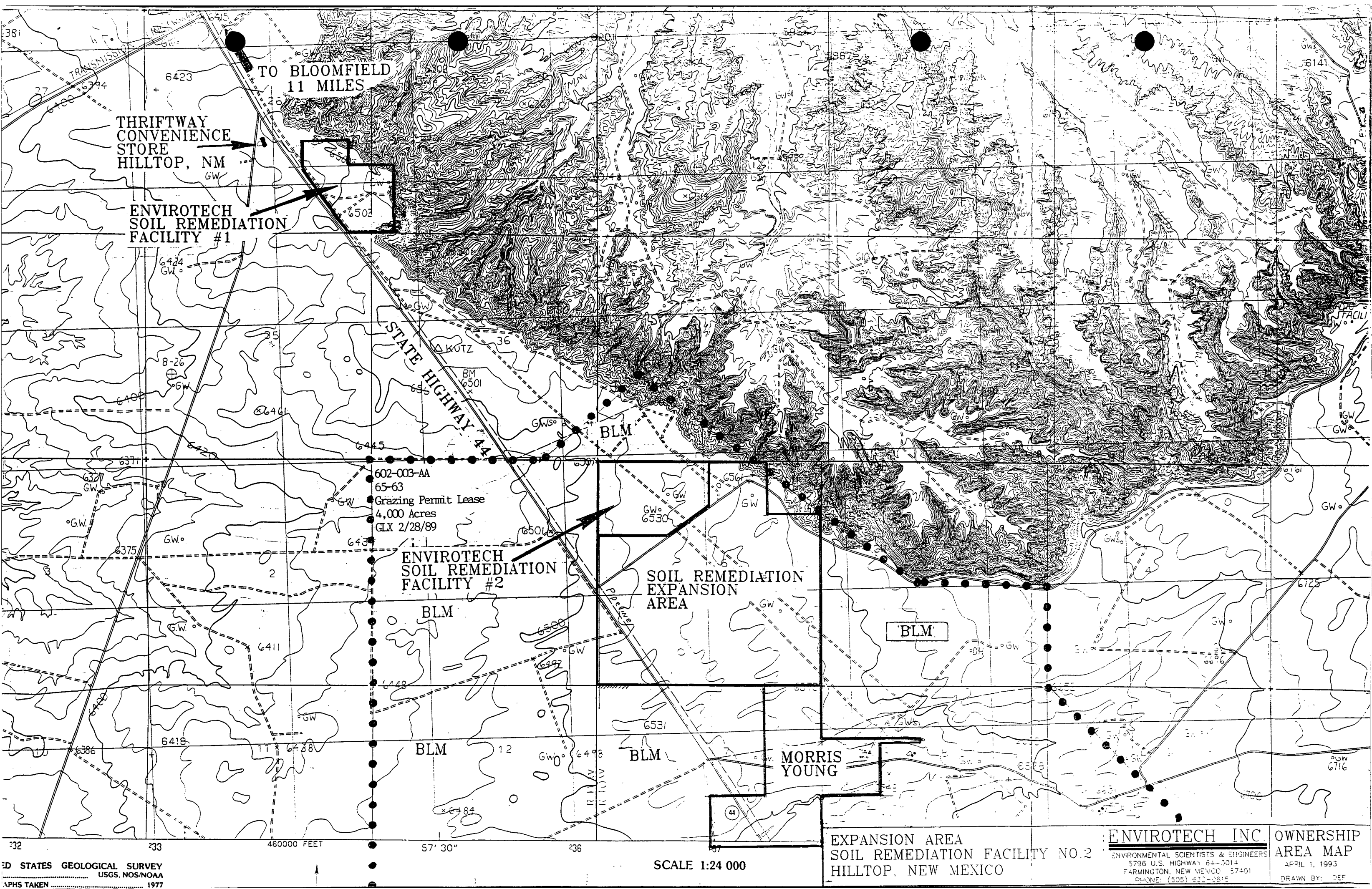
Tract in Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in Section 6, T. 26 N., R. 10 W., NMPM, San Juan County, New Mexico, and being more particularly described as follows:

BEGINNING AT THE SW corner of said Section 6;  
THENCE North 3,960 feet along the section line;  
THENCE East 1,500 feet;  
THENCE S 86° E 169' feet;  
THENCE S 54° W 420 feet;  
THENCE S 50° E 668 feet;  
THENCE N 40° E 422 feet;  
THENCE N 50° W 554 feet;  
THENCE N 86° W 169' feet;  
THENCE N 54° 51' E 1177 feet along a road;  
THENCE N 0° 18' W 1,063 feet to the N  $\frac{1}{4}$  corner of said Section 6;  
THENCE East 1,320 feet;  
THENCE South 1,320 feet;  
THENCE East 1,320 feet to the Section line;  
THENCE South 3,960 feet along the Section line to the Southeast corner of said Section 6;  
THENCE West 5,280 feet along the Section line to the SW corner of said Section 6 the point of Beginning.

The tract as described contains 495 acres, more or less, and NO right-of-ways, easements, restrictions, or reservations were researched or shown.







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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

M E M O R A N D U M

TO: ROGER C. ANDERSON, Environmental Bureau Chief  
Oil Conservation Division

FROM: KATHY M. BROWN, Geologist  
Oil Conservation Division

SUBJECT: AUDIT OF ENVIROTECH LANDFARM

DATE: MARCH 12, 1993

---

On March 10 and 11, 1993, Kathy Brown and Chris Eustice of the Environmental Bureau of the New Mexico Oil Conservation Division (OCD) conducted an audit of Envirotech Landfarm No. 1 and No. 2. The audit consisted of a thorough review of every load of material received at the landfarms. The file for each job was retrieved and the following items were determined:

1. Was the material RCRA Subtitle C exempt or nonexempt?
2. If exempt was their a certification from the generator?
3. If nonexempt was a TCLP conducted?
4. If nonexempt was their OCD or NMED authorization?

After determining the above information, we went to the landfarms and physically walked each of the cells to correlate the contaminated soils with the file investigation.

The audit revealed no violations or unauthorized activities besides some minor misfiling or missing accessory paperwork.





WORKING COPY

	Date		Yards	Grid	Truck	H/A	OCD Paperwork
1	10/2/92	Dial Oil Co.	188	A 5	Moss	Y truck, unleaded gasoline	Y
2	10/3/92	Dial Oil Co.	60	A 5	Envt.	Y No TCLP	Y
3	10/5/92	Dial Oil Co.	74	A 6	Moss	Y	Y
4	10/8/92	Meridian Oil Co.	112	A 9 <sup>A25</sup> <sub>A24</sub>	Moss	Y	4
5	10/9/92	Farmington Bus Barn	40	A 7	Envt.	Y UST, CD exempt get off	Y
6	10/9/92	" " "	20	A 7	Envt.	Y	Y
7	10/9/92	Valverde Plant	40	A 7	Envt.	Y	Y
8	10/9/92	Mexican Oil Co.	20	A 9 <sup>A25</sup> <sub>A24</sub>	Moss	Y Diethan diamine Valverde, Mexican exempt cert.	8
9	10/12/92	Mobil Oil	40	A 8	Envt.	Y Bill of for 151 yd. from	9
10	10/12/92	" "	40	A 8	Envt.	Y - Lindnith	10
11	10/13/92	" "	40	A 8	Envt.	Y - No exempt status	11
12	10/13/92	" "	40	A 8	Envt.	Y	12
13	10/14/92	" "	14	A 8	Envt.	Y	13
14	10/19/92	Phelps Dodge	18	A 1	Envt.	Y Y Gault Gas Plant; TCLP SW	Y
15	10/21/92	El Paso	10	I-1	El Paso	Y Jicavilla 35*3	Y
16	10/21/92	Phelps Dodge	20	A 1	Envt.	Y Y	Y
17	10/22/92	" "	20	A 1	Envt.	Y	17
18	10/23/92	" "	20	A 1	Envt.	Y	18
19	10/23/92	" "	20	A 1	Envt.	Y	19
20	10/23/92	" "	20	A 1	Envt.	Y	20
21	10/26/92	" "	20	A 1	Envt.	Y	21
22	10/26/92	" "	20	A 2	Envt.	Y	22
23	10/26/92	" "	20	A 2	Envt.	Y	23
24	10/26/92	" "	20	A 2	Envt.	Y	24
25	10/20-27/92	" "	140	A 2	Envt.	Y	25
26	10/27/92	" "	20	A 2	Envt.	Y	26
27	10/27/92	" "	20	A 2	Envt.	Y	27
28	10/27/92	" "	20	A 2	Envt.	Y	28
29	10/27/92	" "	20	A 2	Envt.	Y	29
30	10/28/92	Duncan Oil <sup>stop bagging</sup>	100		Envt.	Y Envmt Oil Storage, NO Envmt by Envmt, Rel. for metals	30
31	10/29/92	El Paso <sup>PA# #1</sup>	12	I-1	El Paso	Y PA# Wd#1 Bill of Lading / EPA 6 exempt	31
32	10/29/92	Phelps Dodge	20	A 2	Envt.	Y	32
33	10/30/92	Phelps Dodge	140	A 1 & 2	Envt.	Y	33
34	11/2/92	Phelps Dodge	80	A 2	Envt.	Y	34
35	11/3/92	" "	125	A 2 & 3	Envt.	Y	35
36	11/4/92	Duncan Oil	280		Envt.	Y 760 yds	36
37	11/4/92	Phelps Dodge	20	A 3	Envt.	Y	37
38	11/5/92	" "	80	A 3	Envt.	Y	38
39	11/5/92	Duncan Oil	280		Envt.	Y	39
40							40

		1	2	3	4	5	
Date	From	yards	Grid	Truck Environ Paper Work	A		Occ Paper Work
1 11/30/12	EPNG B.P.	28240	EPNG Area	Env't M	Compr. Br. Blanco	Flare P. it	Y
2 11/23	P.D. Gavilan	40	A 4	Env't M			Y
3 11/25	4 Corners Pipeline	240	A 11-12	Cosby M	Montezuma, Utah McElmo Gash Line, MCP exempt cert.		Y
4 11/25	P.D. Gavilan	40	B 4	Env't M			Y
5 11/25	MOI Val Verde	12	A 25	Rielly M	Filter media - Charcoal manhatten exempt cert.		Y
6 11/30	4 Corners Pipe	160	A 11	Cosby M			Y
7 12/1	Foutz 550	360		Cosby M	Farm 1	Some State En. VST exempt cert.	Y
8 12/2	P.D. Gavilan	20	B 5	Env't M			Y
9 12/2	Foutz 550	240		Cosby M	Farm 1		Y
10 12/2	P.D. Gavilan	20	B 5	M&M M	P		Y
11 12/3	Foutz 550	140	A 4	Cosby & Env't			Y
12 12/3	P.D. Gavilan	20	A 4	Env't M			Y
13 12/4	P.D. Gavilan	100	A 4	Cosby M			Y
14 12/4	Foutz 550	200		Cosby M	Farm 1		Y
15 12/4	Foutz 550	40		Env't M	Farm 1		Y
16 12/4	P.D.	20	A 5	Env't M			Y
17 12/4	Foutz 550	60		Env't M	Farm 1		Y
18 12/7	Foutz 550	220		Cosby M	Farm 1		Y
19 12/7	P.D.	60	A 4	Cosby M			Y
20 12/8	P.D.	140	A 4	Cosby & Mad Max			Y
21 12/4	Foutz 550	20		Env't M	Farm 1		Y
22 12/9	P.D.	200	A 5	Cosby M			Y
23 12/10	S&S Ft. Def	20		M	Some State Farm 1 Ind H.S. exempt cert.		Y
24 12/10	P.D.	80	A 5	Mad Max			Y
25 12/10	William Field Serv	40	A 12	Cosby M	Ignacio - Inpaso line Spill William exempt cert.		Y
26 12/10	S&S Ft. Def	20		Cosby M	Farm 1		Y
27 12/11	S&S Ft. Def.	60		Cosby M	Farm 1		Y
28 12/10/11	P.D.	260	A 5 B 5	Cosby M			Y
29 12/11	P.D.	20		Env't M			Y
30	" "	40	A 5 B 5	Mad Max			Y
31 12/12	W.F.S.	80	A 12	Env't & Cosby			Y
32 12/11	S&S Ft. Def.	20	<del>A 12</del>	M	Farm 1		Y
33 12/14	S&S Ft. Def	80		M	Farm 1		Y
34 12/15	P.D.	20	A 5 B 5	Env't M			Y
35 12/15	P.D.	20	B 5	Cosby M			Y
36 12/15	W.F.S.	80	A 12	Cosby M		8 days	Y
37 12/16	J.J. Power Plant	71		Cosby M	Farm 1	AS	Y
38 12/16	P.D.	80	B 5	Cosby M			Y
39 12/9	P.D.	40	B 5	M&M M			Y
40 12/11	P.D.	40	B 5	M&M M			Y
12/16	P.D.	20	B 5	Env't M			Y

	1	2	3	4	5
Date	From	Yards	Grid	Truck Entr. H/A Page/Wht	
1	11/6/92 Duncan Oil	220		ENUT, Y	
2	11/6/92 Phelps Dodge	60	A3	ENUT, Y	
3	11/7/92 Phelps Dodge	180	A3	ENUT, Y	
4	11/9/92 Duncan Oil	180		ENUT, Y	
5	11/9/92 Kirtland C.C. Schools	20	A9	ENUT, Y	UST AD exempt cart
6	11/10/92 Duncan Oil	300		ENUT, Y	
7	11/10/92 P.D.I. Mang. Del Point	20	A10	ENUT, Y	Williams Field Service CS. No status, Bill of Lading only
8	11/8/92 J.C. Hunt	40	A10	Cosby, Y	Colorado State Energy Center Spill
9	11/11/92 EPNG	480	A2	ENUT, Y	Blanco
10	11/13/92 Meridian Val Verde	10	A25	Riley, Y	Filter media Spent (changed) most empty
11	11/13/92 EPNG	760		ENUT, Y	BP
12	11/16/92 EPNG	1120		ENUT, Y	BP
13	11/17/92 EPNG	1540		ENUT, Y	BP
14	11/4/92 P.D.I. (Williams)	Dirty	Filters	glycol duty filters gas plant Never took	
15	11/12/92 EPNG	700		ENUT, Y	BP
16	11/13/92 EPNG	20		ENUT, Y	BP
17	11/14/92 Phelps Dodge	140	A344	ENUT, Y	
18	11/18/92 EPNG	1380		ENUT, Y	BP
19	11/21/92 Phelps Dodge	20		Y	
20	11/20/92 K.C. Bus Barn	80	A9	ENUT, Y	
21	11/19/92 EPNG	1520		ENUT, Y	BP
22	11/21/92 P.D.	40	A4	ENUT, Y	
23	11/20/92 K.C. C.S. Bus	20	A9	ENUT, Y	
24	11/21/92 P.D.	140	A4	ENUT, Y	160 yds
25	11/22/92 P.D.	140	A4	ENUT, Y	
26	11/24/92 EPNG	1370		ENUT, Y	BP
27	11/28/92 EPNG	340		ENUT, Y	BP
28	11/29/92 "	250		ENUT, Y	BP
29	11/24/92 K.C.C.S. Bus	20	A9	ENUT, Y	
30	11/24/92 4 Corners Pipeline	240	A11	Cosby, Y	McElmo Gutierrez
31	11/24/92 MOI Val Verde	12	A9A25	Riley, Y	Filter media
32	11/23/92 EPNG	1320		ENUT, Y	BP 1320 yds
33	11/24/92 P.D.	40	A4	ENUT, Y	
34	11/23/92 4 Corners Pipe	80	A11	Cosby, Y	McElmo
35	11/21/92 KCCS Bus Barn	30	A9D	ENUT, Y	
36	11/20/92 EPNG	980		Y	BP
37	11/20/92 KCCS Bus Barn	160	A9	Mad Max	
38	11/23/92 Phelps Dodge	40	A4	ENUT, Y	
39					
40					
		next entry		11/20/92	

OC D  
Page Wht  
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40

	1	2	3	4	5	
Date	From	Yards	Grid	Truck Envir H/A Pupark		Occ Pupark
12/16	San Juan Coal	58 <del>3</del>		Cosby Farm <sup>NO TRIP</sup>		Y
12/17	P.D.	20	B5	Envir Y		Y
12/17	P.D.	80	B5	Envir Y		Y
12/17	W.F. Serv. Ig	57	A12	Cosby Y	Tested after handling in Numbert; (S. Tube oil)	Y
12/18	P.D.	80	A5B5	Cosby Y		Y
12/18	W.F. Serv Ig	108	A12	Cosby Y		Y
12/18	P.D.	180	B4	Cosby Y		Y
12/22	ARM	10 Barrels	A12	ARM Y	Hall-Nim Exempt TOLP WIS	Y
1/4	W.F.S.	12	A12	Moss Y	Well location Pit	Y
1/19	EPNG	12	I10	EPNG Y	Exempt, Cert by EPNG <sup>Model Thru</sup> well loc.	Y
1/25	Sun Glass	20	A29	Envir Y	Request to Accept 5/3/93 Cert. VST <sup>Exempt</sup> cert	Y
1/27	Dial	21	A6	Moss Y	Hose pulled loose from Service Station Dirt out on spill. Billed for daily	Y
2/2	PNM	180 <del>20</del>	G9 <del>A</del>	Envir Y	Diesel <del>fuel</del> Fuel from AST No TRIP, exempt status from	Y
2/11	EPNG <sup>Marysaker</sup>	8	I10	EPNG <del>295</del>	Exempt Cert by EPNG, well loc.	Y
2/23	EPNG				Exempt Cert by EPNG, well loc.	Y
	City <sup>Well location</sup> <del>Exempt</del> <sup>Exempt</sup> Co. color	5	I10	EPNG 295		Y
2/26	Halliburton Service	240	B9	Envir Y	TOLP Oct. 92 authorized for year Farm 2	Y

27500  
5000  
3700  
1000 x 5000  
200 cu yd  
240 cu yd





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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

March 12, 1993

CERTIFIED MAIL  
RETURN RECEIPT NO. P-667-241-950

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

**RE: ENVIROTECH LANDFARM NO. 2**

Dear Mr. Young:

Envirotech, Inc. was directed by the New Mexico Oil Conservation Division (OCD) on March 5, 1993 to close both Landfarm No. 1 and Landfarm No. 2 because of suspected violations of OCD Rule 711. The OCD conducted an audit of the Envirotech facilities on March 9-11, 1993 for compliance with OCD Rule 711 and the terms and conditions of the approval permits.

Based upon results from the audit on Landfarm No. 2, there were no significant violations; therefore, the OCD approves the opening of Landfarm No. 2 located in the NW/4 Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico, pursuant to the following conditions:

1. The contaminated soils located in the temporary storage area as approved by the OCD on March 9, 1993 will be placed in the Landfarm No. 2 by April 1, 1993.
2. Exempt contaminated soils will be placed in the landfarm so that they are physically separate (ie. bermed) from nonexempt contaminated soils. There will be no mixing of exempt and nonexempt soils.

Mr. Morris D. Young  
March 12, 1993  
Page 2

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

Mr. Morris D. Young  
March 12, 1993  
Page 3

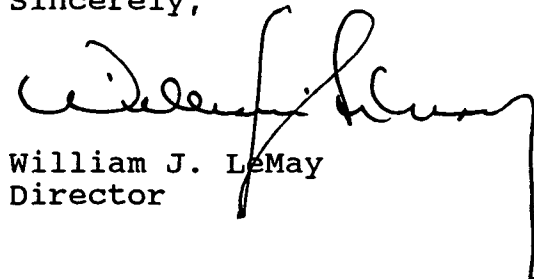
- d. "Non-hazardous" non-exempt contaminated soils if there is an emergency request and the wastes are accompanied by a "Certification of Waste Status" certifying the nonhazardous classification of the soils signed by the appropriate state or federal regulatory agency. OCD approval must be obtained prior to accepting the wastes.
6. At no time will the Envirotech Facility accept wastes which are hazardous by either testing or listing.

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

**The OCD directive to close Landfarm No. 1** located in the NE/4 SE/4, Section 26, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico, **remains in effect.** Landfarm No. 1 will not reopen until the hazardous waste has been disposed of in accordance with NMED Hazardous Waste Regulations and Envirotech receives written authorization from both the NMED and the OCD. You are further directed to reestablish the fence separating the holding area containing the hazardous waste from the permitted boundary of Landfarm No. 1. An OCD representative will be present when the fence is being reestablished. Access to Landfarm No. 1 and the holding and stabilization areas adjacent to Landfarm No. 1 is restricted to personnel authorized by the OCD and must be accompanied by an OCD representative.

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

Sincerely,



William J. LeMay  
Director

WJL/kmb

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





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.

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

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

RECEIVED

'93 MAR 12 AM 9 04

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.

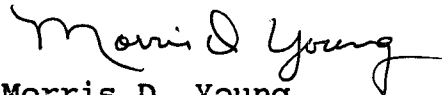
If NMOCD desires, we will reestablish the fence separating the holding area that adjoins Landfarm No. 1. Although this holding area is outside our permitted landfarm boundaries, the interior fence separating them was damaged numerous times by movement of heavy equipment and large trucks when placing 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". The signature is written in dark ink and is positioned above the printed name.

Morris D. Young  
President  
MDY/cj08

CC: NMOCD - Frank Chavez



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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

November 24, 1992

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

CERTIFIED MAIL  
RETURN RECEIPT NO. P-667-241-919

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

RE: **Envirotech Inc. Landfarm**  
**Request for OCD Rule 711 Modification**  
**San Juan County, New Mexico**

Dear Mr. Morris:

The Oil Conservation Division (OCD) has received your October 5, 1992, request for a modification of the OCD Rule 711 permit approval dated September 29, 1992, for a commercial soil remediation facility (landfarm) located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The request for modification is to change the maximum size of the cells under Treatment Zone Monitoring, condition No. 2, from five (5) acres to fifteen (15) acres.

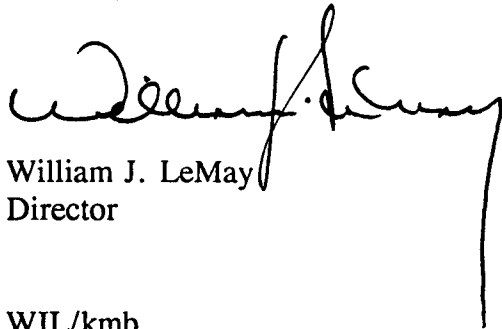
The OCD has evaluated the request for modification and at this time the request is denied. The OCD strives to be consistent with all OCD Rule 711 permit approval conditions for landfarms unless site specific conditions warrant alternative requirements. Currently, the OCD is permitting all commercial landfarms with a maximum area of 5 acres per one (1) sample for treatment zone monitoring. If future sampling results indicate that the size of this area could be increased and still provide a representative sample then the OCD will re-evaluate the maximum size allowed for an individual sampling area.

The OCD recommends that Envirotech resubmit the request for modification in one (1) year after establishing a trend from the sampling results. At that time the OCD will have more information necessary to evaluate the request.

Mr. Morris D. Young  
November 24, 1992  
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay". The signature is fluid and cursive, with a long vertical line extending downwards from the end of the name.

William J. LeMay  
Director

WJL/kmb

xc: Denny Foust, OCD Aztec Office

# ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

02 03 19 PM 9 18

October 14, 1992

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

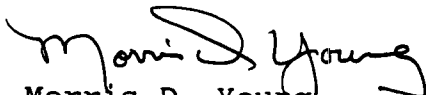
Re: Surface Waste Disposal Bond  
for Envirotech's OCD Rule 711 Soil Remediation Site No.2  
Hilltop, New Mexico

Dear Mr. Anderson,

Enclosed please find the Waste Disposal Bond as required for  
Envirotech's Soil Remediation Site No. 2 near Hilltop, New Mexico.

We appreciate your continued cooperation and help in following-up  
on the many details required.

Sincerely,

  
Morris D. Young  
President

MDY/cj12

# ENVIROTECH INC.

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

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

'92 OCT 9 PM 9 45

October 5, 1992

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

Re: Envirotech Inc. Landfarm  
OCD Rule 711 Permit Approval

Dear Mr. LeMay:

Envirotech Inc. is in receipt of the September 29, 1992 OCD Rule 711 Permit Approval for a Landfarm in San Juan County New Mexico.

We have carefully reviewed this permit approval and the attached operating, monitoring, and reporting requirements. The only condition we specifically request modification of is the designated size of the cells under Treatment Zone Monitoring, condition No. 2.

As per the attached drawing, Envirotech's Landfarm has been laid out in approximately fifteen (15) acre cells to facilitate separation of each major client's soils. These dedicated cells are separated from each other physically by four (4) foot high berms. This cell arrangement specifically meets the producing companies requirements to reduce their liability. They remain responsible for only their soils, not another producer, as could possibly occur with intermixed soils. Assigning individual cells for major operators also facilitates more accurate record keeping.

In-as-much as we are informed that the purpose of the Treatment Zone Monitoring is to preclude contamination of groundwater, and at this site the first groundwater is over One Thousand (1000) feet below ground surface with large shale bodies present in the intervening formation, we respectfully request the monitoring cell size be designated as no larger than fifteen (15) acres on this specific Landfarm. The site conditions preclude contamination of groundwater.

A monitoring program based on the above request will provide the same degree of groundwater protection without the cost and operating constraints a five (5) acre cell designation causes.

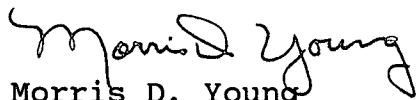


Landfarm OCD Rule 711  
Envirotech Inc.  
October 5, 1992

Page 2

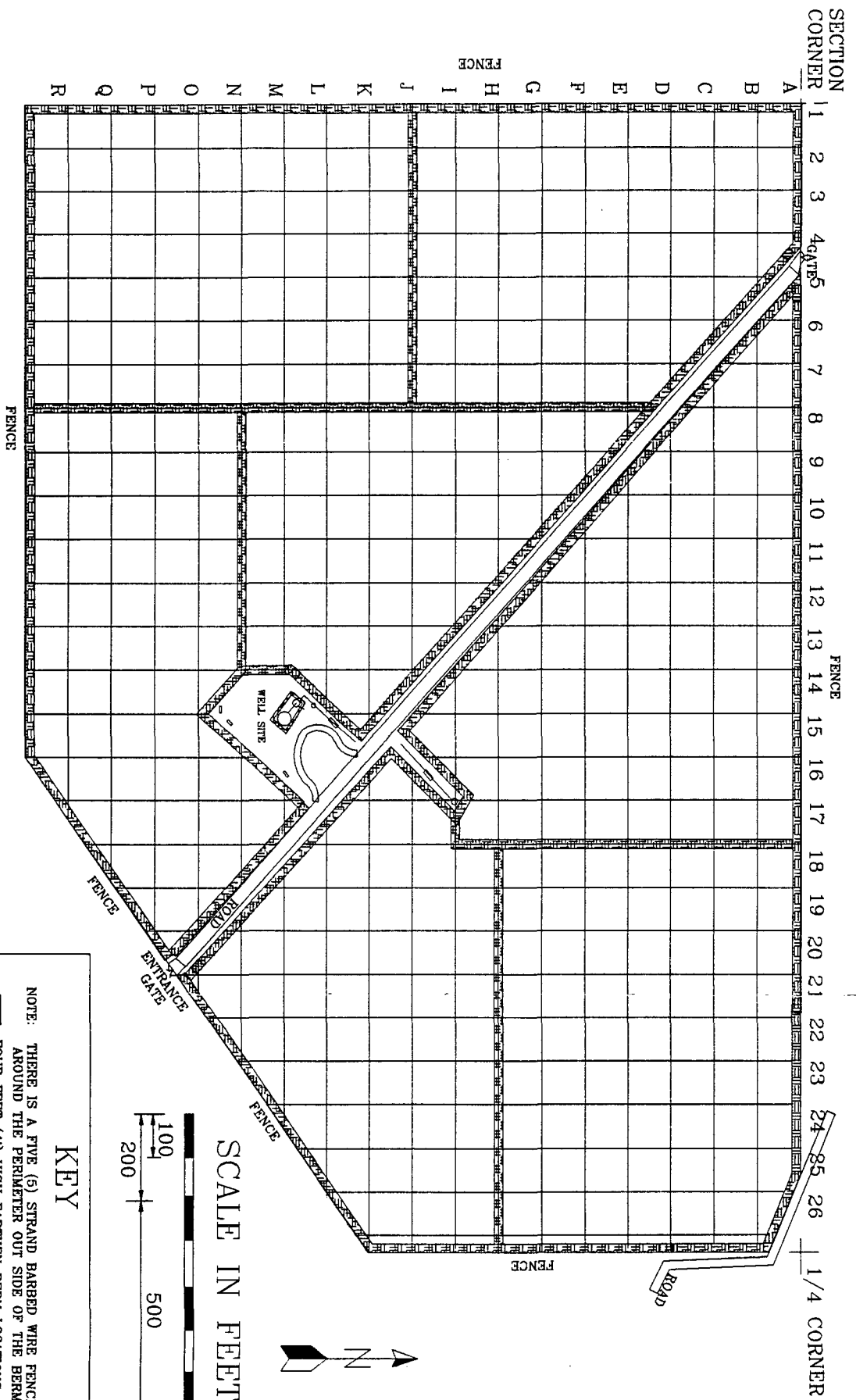
Your anticipated review and approval of this condition modification  
is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, reading "Morris D. Young". The signature is written in dark ink and is positioned above the printed name and title.

Morris D. Young  
President

MDY/cj91



ENVIROTECH INC.  
LAND FARM  
NO. 2

NORTHERN 100 ACRES OF THE  
NORTHWEST 1/4 OF SECTION  
6, TOWNSHIP 26 NORTH,  
RANGE 10 WEST, NMPM.



BRUCE KING  
GOVERNOR

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

Received Sept 29, 1992  
Morris D. Young

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

September 29, 1992

CERTIFIED MAIL  
RETURN RECEIPT NO. P-670-683-590

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

RE: **Envirotech Inc. Landfarm Application**  
**OCD Rule 711 Permit Approval**

Dear Mr. Morris:

26 1003 31513

The Oil Conservation Division (OCD) has received your July 7, 1992, request for an expansion of your current soil remediation facility located in Section 28, Township 27 North, Range 11 West, NMPM, San Juan County, New Mexico. Because the proposed landfarm expansion is not contiguous with the current facility (ie. approximately a mile away) the OCD considers the proposed site a new facility. A separate bond for \$25,000 is required for the proposed landfarm since it is a new facility.

The **permit application for the Envirotech Inc. Landfarm** located in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico, **is hereby approved** in accordance with the OCD Rule 711 under the conditions contained in the enclosed attachment. The application consists of the original application dated July 7, 1992.

The operation, monitoring and reporting shall be as specified in the enclosed attachment. All modifications and alternatives to the approved landfarming methods must receive prior OCD approval. You are required to notify the Director of any facility expansion or process modification and to file the appropriate materials with the Division.

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.

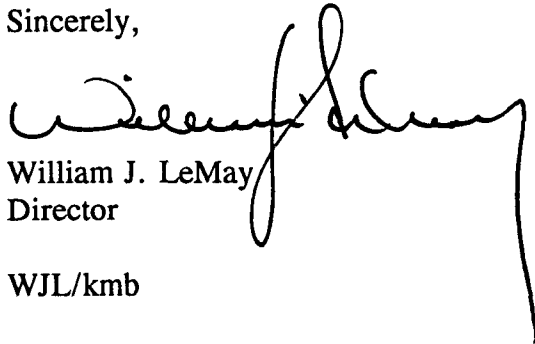
Mr. Morris D. Young  
September 29, 1992  
Page 2

Please be advised that all tanks exceeding 16 feet in diameter and exposed pits, ponds or lagoons must be screened, netted or otherwise rendered nonhazardous to migratory birds.

This permit approval is for a period of five (5) years. This approval will expire on September 29, 1997 and you should submit an application for renewal in ample time before that date. The Division shall have the authority to administratively change this permit to protect fresh water, human health and the environment.

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. LeMay', with a long, sweeping horizontal stroke extending to the right.

William J. LeMay  
Director

WJL/kmb

Attachment

xc: Denny Foust, OCD Aztec Office

**ATTACHMENT TO OCD 711 PERMIT APPROVAL  
ENVIROTECH INC.  
COMMERCIAL LANDFARM  
(September 29, 1992)**

**LANDFARM OPERATION**

1. All contaminated soils received at the facility will be spread and disked within 72 hours of receipt.
2. Soils will be spread on the surface in six inch lifts or less.
3. Soils will be disked a minimum of one time every two weeks (biweekly) to enhance biodegradation of contaminants.
4. Successive lifts of contaminated soils will not be spread until a laboratory measurement of Total Petroleum Hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), and the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and the benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations will be maintained at the facility. Authorization from the OCD will be obtained prior to application of successive lifts.
5. Only solids which are exempt from the RCRA Subtitle C regulations or non-hazardous by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt solids will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal. Any non-oilfield wastes which are RCRA Subtitle C exempt or are non-hazardous by characteristic testing will only be accepted on a case-by-case basis and with prior OCD approval.
6. Moisture will be added as necessary to control blowing dust and to enhance bioremediation. There will be no ponding, pooling or run-off of water allowed. Any ponding of precipitation will be removed within seventy-two (72) hours of discovery.
7. Enhanced bio-remediation through the application of microbes (bugs) will only be permitted after prior approval from the OCD. Request for application of microbes must include the location of the area designated for the bio-remediation program, composition of additives, and the method, amount and frequency of application.
8. No free liquids or soils with free liquids will be accepted at the facility.
9. Comprehensive records of all material disposed of at the facility will be maintained at the facility. The records for each load will include: 1) the origin, 2) analysis for hazardous constituents if required, 3) transporter, and 4) exact cell location and method of remediation.

## TREATMENT ZONE MONITORING

1. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface. The sample will be analyzed for total petroleum hydrocarbons (TPH), general chemistry, and heavy metals using approved EPA methods.
2. A treatment zone not to exceed two (2) feet beneath the land farm will be monitored. A minimum of one random soil sample will be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then quarterly thereafter. The sample will be taken at two to three (2-3) feet below the native ground surface.
3. The soil samples will be analyzed for TPH, volatile aromatic organics (BTEX) quarterly and general chemistry and heavy metals annually using approved EPA methods.
4. After obtaining the soil samples the boreholes will be filled with an impermeable material such as bentonite cement.

## REPORTING

1. Analytical results from the treatment zone monitoring will be submitted to the OCD Santa Fe Office within thirty (30) days of receipt from the laboratory.
2. The OCD will be notified of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.

## BOND

Pursuant to OCD Rule 711 a surety or cash bond in the amount of \$25,000, in a form approved by the Division, is required prior to commencing construction of the commercial surface disposal facility.

## CLOSURE

When the facility is to be closed no new material will be accepted. Existing soils will be remediated until they meet the OCD standards in effect at the time of closure. The area will then be reseeded with natural grasses and allowed to return to its natural state. Closure will be pursuant to all OCD requirements in effect at the time of closure.

**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 Commission Regulations, the following applications to construct and operate a commercial surface waste disposal facility have 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, 5796 U.S. Highway 64-3014, Farmington, New Mexico 87041, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 800 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

ConTeck Environment Services, Inc., Lawrence M. Hicks, Vice President, 22480 Highway 169, Elk River, Minnesota 55330, has submitted an application to construct and operate a mobile thermal redaction plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.

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 discharge plan 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 and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY, Director  
Journal, August 7, 1992

OIL CONSERVATION DIVISION  
RECEIVED

**STATE OF NEW MEXICO**

County of Bernalillo

ss

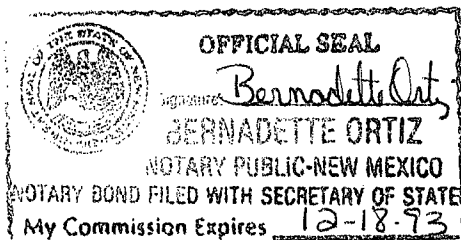
'92 AUG 14 AM 9 09

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.....7.....day

of.....Aug....., 1992, and the subsequent consecutive

publications on....., 1992.



Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this .....7..... day of.....Aug....., 1992.

PRICE.....\$ 32.28

Statement to come at end of month.

CLA-22-A (R-12/92)

ACCOUNT NUMBER.....C80930.....

## **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 Commission Regulations, the following applications to construct and operate a commercial surface waste disposal facility have 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, 5796 U.S. Highway 64 - 3014, Farmington, New Mexico 87401, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.**

**ConTeck Environmental Services, Inc., Lawrence N. Hicks, Vice President, 22460 Highway 169, Elk River, Minnesota, 55330, has submitted an application to construct and operate a mobile thermal remediation plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.**

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

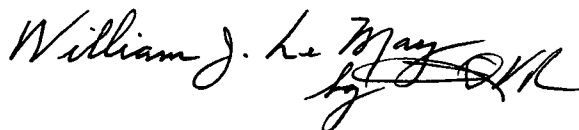


a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held., A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico,  
on this 28th day of July, 1992.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

A handwritten signature in cursive script, reading "William J. Lemay", followed by a stylized flourish or set of initials.

WILLIAM J. LEMAY, Director

S E A L

# ENVIROTECH INC.

ATION DIVISION  
UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

July 7, 1992

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

Re: Expansion of Soil Remediation Facility  
San Juan County, New Mexico

Dear Mr. LeMay:

Young Engineering Services dba, Envirotech Inc., currently operates a soil remediation site in Section 26, Township 27 North, Range 11 West N.M.P.M., San Juan County, New Mexico. This facility is operated under permit of the New Mexico Oil Conservation Division (NMOCD) under OCD Rule 711. The New Mexico Oil Conservation Division is the oversight agency providing direction and routine inspection of the facility.

Envirotech's current facility consists of approximately 83 acres that are fenced and bermed to provide a secure location. With in this enclosure, we then spread soils for remediation of oil field hydrocarbon contaminated soils. The property is located approximately 12 miles south of Bloomfield, New Mexico, off U.S. Highway 44, in San Juan County.

With the pending implementation of the Expansion of The Vulnerable Area as per NMOCD Case No. 10436, numerous producers have approached Envirotech to determine if our facility would be able to accept contaminated soils they anticipate generating as a results of closure of earthen production pits throughout the San Juan Basin. In order to facilitate the demand, we have purchased additional private property to expand our facility.

The purposed expansion area is near contiguous and south of our present facility encompassing 100 acres in the NW 1/4, of section 6, Township 26 North, Range 10 West, N.M.P.M. The property is a part of an 1118.14 acre purchase from Chevron U.S.A. Inc. as per the attached Letter of Intent to Sell. The balance of the ranch property is being purchased by Morris D. Young personally.

OCD-Expansion Request  
Envirotech, Inc.  
July 8, 1992

Page 2

The property is undeveloped ranch land that is uniquely suited for thin spread soil remediation. As per the attached AREA/PROPERTY OWNERSHIP MAP, The site is bounded on the North and West sides by Bureau of Land Management administered land. Attached please find a copy of Envirotech's notification to the Bureau of Land Management's Farmington, New Mexico, District Office of this application to expand our soil remediation site.

This property is relatively planier with a gentle slope to the west. U.S. Hwy. 44 provides access to the property. The site is remote from any population except for a mobile home occupied by an employee of the rancher, who is currently leasing a portion of the property for grazing on a month to month basis. Groundwater is estimated to be greater than 1000 feet below ground surface. The only water well within 10 miles of the site, according to the records of the New Mexico State Engineers Office, is located at the Thriftway Convenience Store approximately 2 miles to the northwest. This well is completed in the Ojo Alamo formation. Top perforations are reported to be at 1280 feet below ground surface.

The entire soil remediation site will be bermed and fenced. A 4-foot high earthen berm with a 2:1 slope will ensure positive containment on site of any storm waters. Normal annual percipitation at the site is approximately 9 1/2 inches. A 5 wire barbed wire fence will be placed at the outside toe of the berm to prevent encroachment ont the site of any livestock. All gates will be locked except during business hours to prevent unauthorized entry to the facility.

Envirotech's remediation site operating personnel are 40 hour OSHA trained for Hazardous Material Handling and Site Investigation as well as 24 hour State of New Mexico Mine Safety and Health Administration (MSHA) trained.

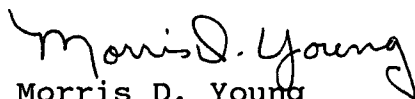
The proposed expansion area exhibits the same positive site characteristics that make our existing facility situated in the best possible location to efficiently and effectively remediate hydrocarbon contaminated soils without impacting the groundwater and/or the health safety and welfare of the population of the San Juan Basin.

OCD-Expansion  
Envirotech, Inc.  
July 8, 1992

Page 3

Your immediate attention to this application is appreciated. If we can provide any additional information or in any way be helpful, please contact us.

Sincerely,

  
Morris D. Young  
President

MDY/jmj  
500J.DOC



**Chevron U.S.A. Inc.**

6400 South Fiddler's Green Circle, Englewood, CO 80111, P. O. Box 599, Denver, CO 80201

June 30, 1992

Mr. Morris D. Young  
Young Engineering Service, Inc.  
5796 U.S. Highway 64 - 3014  
Farmington, NM 87401

Re: Letter of Intent to Sell  
100 acres, more or less  
San Juan County, NM  
LDMS File 602-002-AA

Dear Mr. Young:

This letter is to express the intent of Chevron U.S.A. Inc. to sell Young Engineering Service, Inc. the north 100 acres of the Northwest Quarter of Section 6, Township 26 North, Range 10 West, N.M.P.M., San Juan County, New Mexico for \$40,000.

As discussed, our attorneys will draft the Purchase Agreement with an anticipated closing date of August 1, 1992, contingent on a satisfactory environmental review and soil sampling program. In the interim, you may have free ingress and egress to the property for the purpose of conducting surveying and data collection.

This letter is merely an expression of intent and a binding contract will only come into existence when a formal written Purchase Agreement has been fully executed.

Please feel free to call me at (303)930-4081 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Talbott", with a long horizontal flourish extending to the right.

Charles B. (Pat) Talbott  
Area Manager-Western U.S. Lands  
The Pittsburg & Midway Coal Mining Co.

cc: Mike Campbell  
R.D. Gardner

YOUNG ENGINEERING SERVICES INC.

Tract in NW1/4 of Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in the NW 1/4 of Section 6, T. 26 N., R. 10 W.,  
NMPM, San Juan County, New Mexico, and being more particularly  
described as follows:

BEGINNING at the NW corner of said Section 6;

THENCE East 2,640 feet along the section line to the 1/4  
corner;

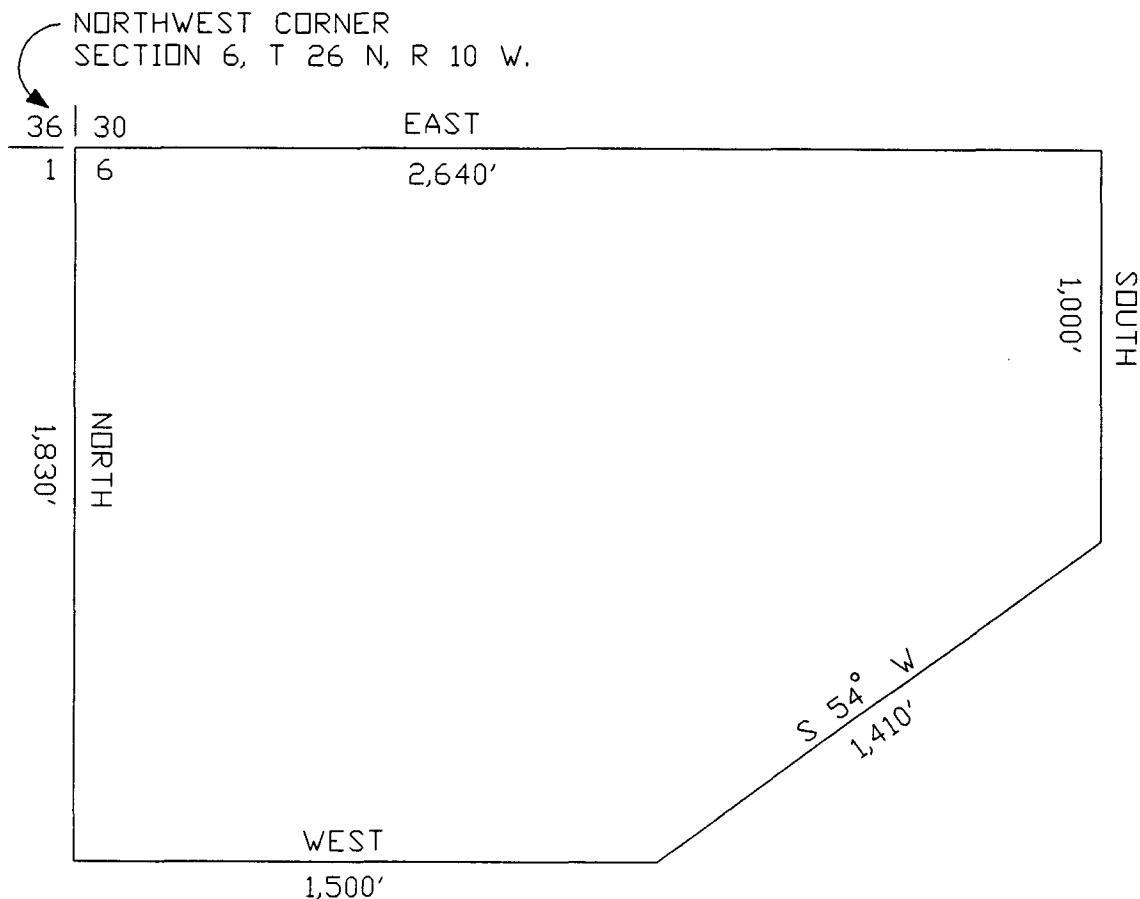
THENCE South 1,000 feet along the 1/4 section line;

THENCE S 54° W, 1,410 feet;

THENCE West 1,500 feet to the west line of Section 6;

THENCE North 1,830 feet along said Section line to the  
point of Beginning.

The tract as described contains 100 acres, more or less, and NO  
right-of-ways, easements, restrictions or reservations were  
researched or shown.



# ENVIROTECH INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

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

July 7, 1992  
Certified Mail  
Return Reciept No. P 081 703285

United States Department of the Interior  
Bureau of Land Management  
Farmington Resource Area  
1235 LaPlata Highway  
Farmington, New Mexico 87401

Dear Sirs:

Young Engineering Services, dba Envirotech, Inc. operates a soil remediation facility in Section 26, Township 27 North, Range 11 West. This facility is permitted under Rule 711 by the New Mexico Oil Conservation Division (NMOCD). The NMOCD regulates and provides oversight of the operation of this facility.

As per the attached NMOCD correspondence, our facility is authorized to accept only non-hazardous oilfield soils for remediation. Received soils are thin spread on the land surface and disk plowed every 2 weeks to enhance biodegradation and photodegradation of any contained hydrocarbon material. The process is continued until the soils are totally remediated to NMOCD standards.

The site is securely fenced and locked to prevent livestock or unauthorized persons from entering the facility. We have also constructed a 4 foot earthen berm around the entire facility perimeter to prevent any storm run-off or migration of soils off-site.

Groundwater in this area is greater than 1,000 feet below the ground surface. The only water well on record with the New Mexico State Engineer's Office is located at the Thriftway Convenience Store on the west side of U.S. Highway 44.

Envirotech currently has an application pending with the NMOCD to expand this facility to include our property in Section 6, Township 26 North, Range 11 West. As per the attached AREA/PROPERTY OWNERSHIP MAP, Bureau of Land Management property adjoins this site on the North and West sides.

BLM  
Envirotech, Inc.  
July 8, 1992

Page 2


This geographic area provides a unique site remote from any population in an area where groundwater will not be impacted. All weather access is provided by U.S. Highway 44 and the site is surrounded by the oil/gas fields we serve.

In accordance with Section B, Rule 711, the NMOCD will issue public notice of this application to expand the soil remediation facility. Any person seeking to comment on the application must file comments with the NMOCD within 30 days of the date of public notice.

We feel this facility expansion is urgently required to facilitate closure of unlined earthen production pits which will protect the groundwater resources of the San Juan Basin. Furthermore, we feel we operated our facility in a responsible manor that mitigates any environmental and/or commercial impact on the adjoining property owners.

Many BLM personnel, including several members of BLM-Farmington, N.M. have visited our facility and are familiar with our operation. If BLM has no objection to this facility expansion, we request that you respond and indicate that position. Your concurrence in helping us to positively effect the environment of the San Juan Basin is sincerely appreciated.

Sincerely,



Morris D. Young  
MDY/jmj  
501J.DOC

CC: Mr. William J. LeMay  
Director NMOCD





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

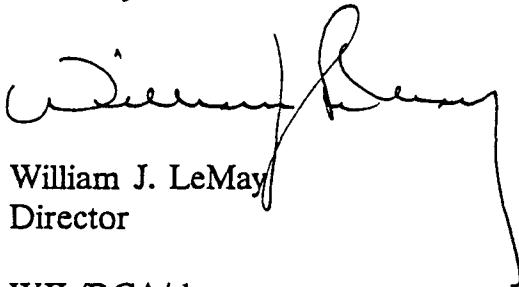
Page -2-

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

YOUNG ENGINEERING SERVICES INC.

Tract in NW1/4 of Section 6, T-26-N, R-10-W,  
N.M.P.M., San Juan County, New Mexico.

A tract of land in the NW 1/4 of Section 6, T. 26 N., R. 10 W.,  
NMPM, San Juan County, New Mexico, and being more particularly  
described as follows:

BEGINNING at the NW corner of said Section 6;

THENCE East 2,640 feet along the section line to the 1/4  
corner;

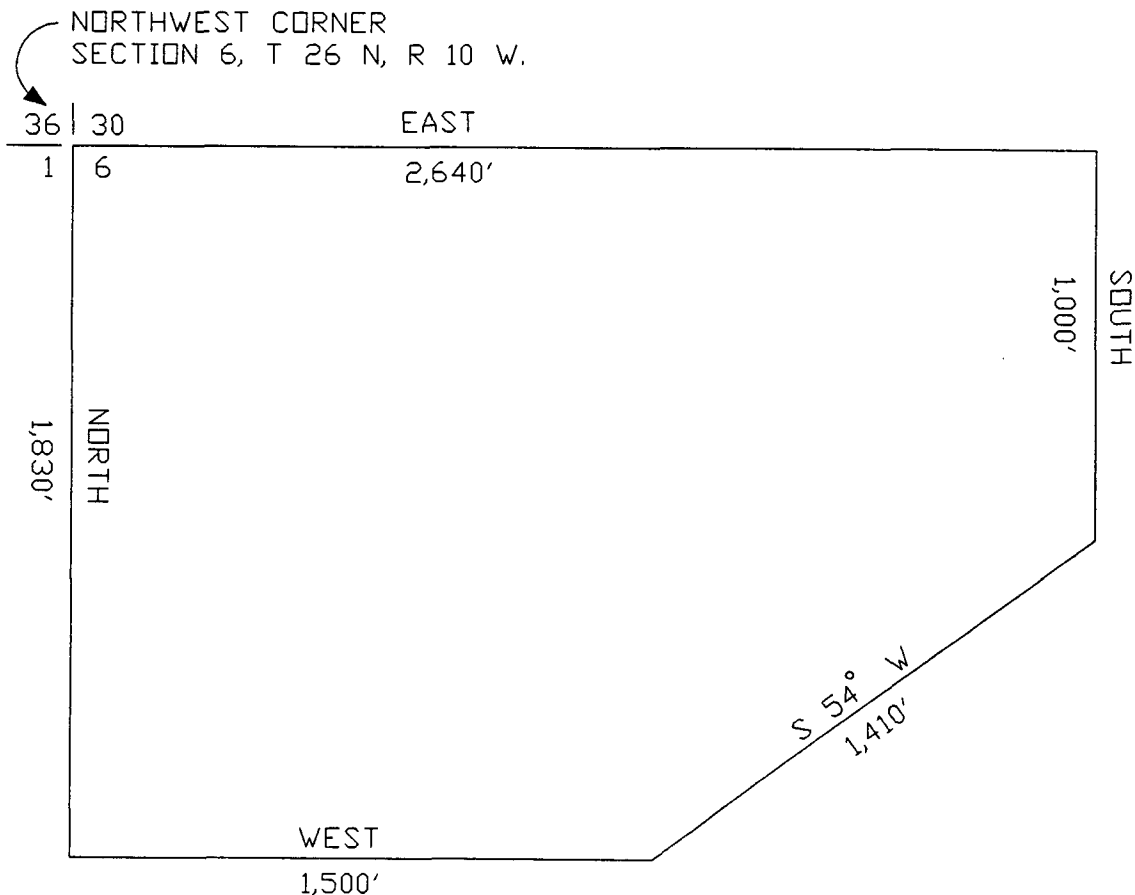
THENCE South 1,000 feet along the 1/4 section line;

THENCE S 54° W, 1,410 feet;

THENCE West 1,500 feet to the west line of Section 6;

THENCE North 1,830 feet along said Section line to the  
point of Beginning.

The tract as described contains 100 acres, more or less, and NO  
right-of-ways, easements, restrictions or reservations were  
researched or shown.





THRIFTYWAY  
CONVIENCE  
STORE  
HILLTOP, NM

TO BLOOMFIELD

ENVIROTECH  
SOIL REMEDIATION  
FACILITY

STATE HIGHWAY 44

BLM

602-003-AA  
65-63  
Grazing Permit Lease  
4,000 Acres  
GLX 2/29/89

602-002-AA  
GOC Surface Deed  
1,120 Acres (PT)  
65-63

ENVIROTECH  
EXPANSION  
AREA

MORRIS YOUNG

BLM

BLM

BLM

BLM

LAND FARM EXTENTION  
1.5 MILES SOUTHEAST  
OF EXISTING LAND FARM  
HILLTOP, NEW MEXICO

ENVIROTECH INC.

ENVIRONMENTAL SCIENTISTS  
1000 U.S. HIGHWAY 44-2014  
SARASOTA, FL 34231  
(941) 552-1000

DRAFTED BY: J. DEWEY  
OWNERSHIP  
AREA MAP  
JULY 2, 1992



THRIFTYWAY  
CONVIENCE  
STORE  
HILLTOP, NM

TO BLOOMFIELD

ENVIROTECH  
SOIL REMEDIATION  
FACILITY

STATE HIGHWAY 44

BLM

602-003-AA  
65-63.  
Grazing Permit Lease  
4,000 Acres  
GLX 2/29/89

602-002-AA  
300 Surface Deed  
120 Acres (PT)  
65-63

ENVIROTECH  
EXPANSION  
AREA

BLM

MORRIS YOUNG

BLM

BLM

BLM

LAND FARM EXTENTION  
1.5 MILES SOUTHEAST  
OF EXISTING LAND FARM  
HILLTOP, NEW MEXICO

ENVIROTECH INC

ENVIRONMENTAL SCIENTISTS  
1700 U.S. HIGHWAY 44-201A  
FARMINGTON, NEW MEXICO 87401  
PHONE: (505) 622-1111

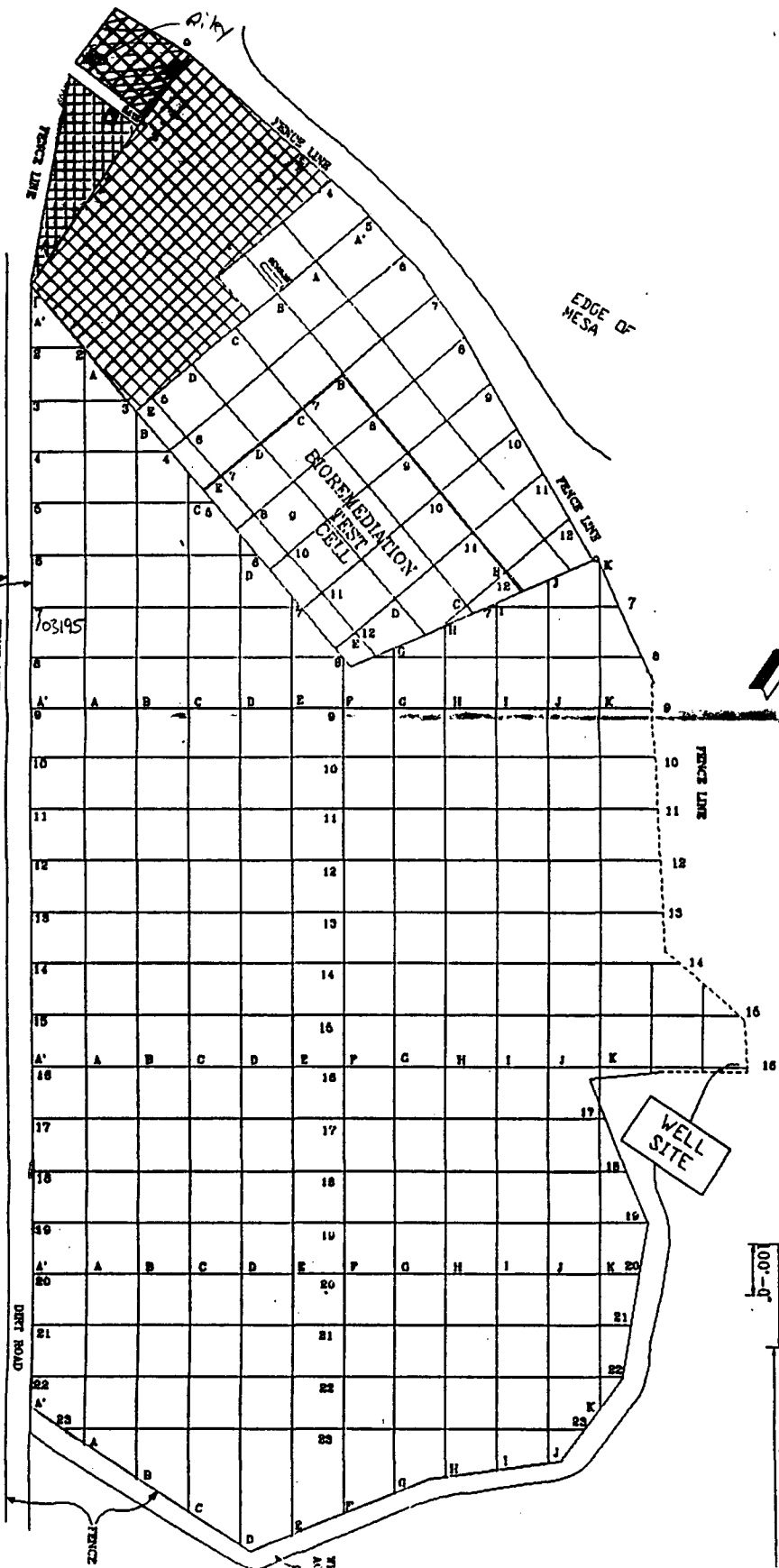
DRAFTED BY: J. DEWEY  
OWNERSHIP  
AREA MAP  
JULY 2, 1987



- ☒ HOLDING AREA FOR SOIL TO BE SCREENED
- ☐ SEPARATE SECURED HOLDING AREA



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