

NM1 - 12

INSPECTIONS & DATA

May 1, 2003

Martyne J. Kieling
NMOCD Environmental
Box 6429
1220 S. Saint Francis Dr.
Santa Fe, NM 87504

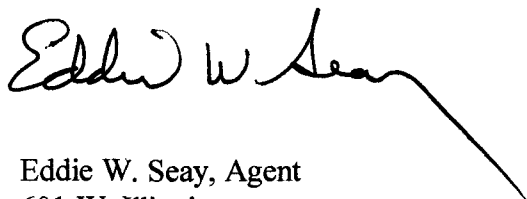
RE: C & C Landfarm

Martyne:

Just thought I would send these photos as a follow-up from our January letters. These photos show where we pumped the water off in Dec. and Jan. It is still dry. This helps to show that the water was rain water not groundwater as Paul and Larry thought.

These photos will be good for C & C's file.

Thanks,

A handwritten signature in black ink, appearing to read "Eddie W. Seay". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88242
(505)392-2236

RECEIVED

February 18, 2003

FEB 24 2003
Environmental Bureau
Oil Conservation Division

Martyne J. Kieling
NMOCD Environmental
Box 6429
1220 S. Saint Francis Drive
Santa Fe, NM 87504

RE: C & C Landfarm Inc.
Inspection response

Mrs. Kieling:

Pursuant to your inspection and letter dated 1/23/03 noting deficiencies at the landfarm, the problems you listed were being taken care of before we received the letter.

Item 2 - The berms on the landfarm have been re-constructed on all cells. (Note photos)

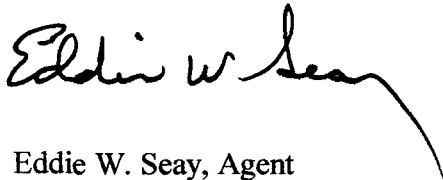
Item 4 - The piles of dirt noted on your inspection have been leveled and disked. We have resolved our problem with EOTT in this matter. (Note photos)

Item 5 - The caliche pit with the standing rain water has been worked on. The area which has contaminated soil has been bermed, and the water ponds have been pumped out; spreading the water over the landfarm area. We will watch this closer in the future. (Note photos)

Item 15 - Find copies of inspection maintenance log and copies of invoices for the disking. We have an outside contractor to disk the landfarm twice a month.

Thank you for your time and consideration in this matter. If you have any questions or need additional information, please call.

Sincerely,



Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88242
(505)392-2236

LANDFARM INSPECTIONS

DATE	DISKING BERMS	TRASH & DEBRIS	WATER	GENERAL COMMENTS
1-3-002	✓	none	small amt.	Road work out.
1-15-002	✓	none	small amt.	—
2-2-002	✓	none	none	—
2-17-002	✓	none	none	—
2-28-002	✓	none	none	—
3-16-002	✓	small amt. plastic	none	Road work completed.

LANDFARM INSPECTIONS

DATE	DISKING	BERMS	TRASH & DEBRIS	WATER	GENERAL COMMENTS
3-30-002	✓		none	none	—
4-13-002	✓		✓	small amt.	—
5-1	Work on Buns.	✓	none	none	—
5-17-002	✓		none	none	—
6-3-002	✓		✓	apparent	Pumped water
6-18-002	✓		✓	none	—

LANDFARM INSPECTIONS


DATE	DISKING	BERMS	TRASH & DEBRIS	WATER	GENERAL COMMENTS
7-2-002	✓		none.	none	—
7-19-002	✓		✓	✓	✓
8-2-002	✓		✓	overgrown	—
8-16-002	✓		✓	none	—
9-1-002	good		✓	none	—
9-18-002	✓		✓	none	—

LANDFARM INSPECTIONS

DATE	DISKING BERMS	TRASH & DEBRIS	WATER	GENERAL COMMENTS
10-2-002	✓ Need Berm work.	✓	done	pretty wet
10-20-002	✓ Need Berm work	pick up plastic work on site.	done	—
1-2-002	✓	work on site past.	done.	✓
1-16-002	✓	work on site past.	done	wet.
12-11-002	✓	ok	Pumping water	ok
12-23-002	✓ start work to condition all berms	ok	Pumping water	ok

088764


INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS  D. B. Northrip P.O. Box 193 Lovington, NM 88260-0193			
CITY, STATE, ZIP <i>Monument, N.M. 88265</i>		CITY, STATE, ZIP			
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.		
			DATE <i>2-7-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish tractor & Equip to</i>			
		<i>Plow C & C Land Farm</i>			<i>1400 00</i>
<i>Thank you</i>					
<i>Doc</i>					
<i>Paid by check #2046 2/7/02</i>					
		<i>Total</i>			<i>1400 00</i>

Adams 5840


088763

INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS  D. B. Northrip P.O. Box 193 Lovington, NM 88260-0193			
CITY, STATE, ZIP <i>Monument, N.M. 88265</i>		CITY, STATE, ZIP			
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.		
			DATE <i>1-7-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish tractor & Equip</i>			
		<i>To Plow C & C Land Farm</i>			<i>1400 00</i>
<i>Thank you</i>					
<i>Doc</i>					
		<i>Total</i>			<i>1400 00</i>

Adams 5840

INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO	
ADDRESS <i>P.O. Box 55</i>		 D. B. Northrip P.O. Box 193 Lovington, NM 88260-0193	
CITY, STATE, ZIP <i>Monument, N.M. 88265</i>		CITY, STATE, ZIP	
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B. DATE <i>3-6-02</i>
ORDERED	SHIPPED	DESCRIPTION	PRICE UNIT AMOUNT
		<i>Furnish tractor & equip to</i>	
		<i>Plow C & C Land Farm</i>	<i>1400 00</i>
<i>Thank you</i> <i>Dec</i> <i>Paid By Check #2048</i>			
		<i>Total</i>	<i>1400 00</i>

Adams 5840

088766


INVOICE

[illegible]

Adams 5840

088767


INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS  <i>D. B. Northrip P.O. Box 193 Lovington, NM 88260</i>			
CITY, STATE, ZIP <i>Monument, N.M. 88245</i>		CITY, STATE, ZIP			
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.		
			DATE <i>5-1-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish tractor & equip to Plow C & C Land Farm</i>			<i>1400 00</i>
<i>Paid By Check # 2241</i>					
<i>Thank you</i>					
<i>Dell</i>					
<i>Total</i>					<i>1400 00</i>

Adams 5840

088768

INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS  <i>D. B. Northrip P.O. Box 193 Lovington, NM 88260</i>			
CITY, STATE, ZIP <i>Monument, N.M. 88265</i>		CITY, STATE, ZIP			
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.		
			DATE <i>6-1-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish Tractor & Equip. to Plow C & C Land Farm</i>			<i>1400 00</i>
<i>Thank you</i>					
<i>Dell</i>					
<i>Total</i>					<i>1400 00</i>

Adams 5840

INVOICE

[illegible]

Adams 5840

088770

INVOICE

[illegible]

Adams 5040

INVOICE

[illegible]

Adams 5840

088772

INVOICE

[illegible]

Adams 5840


INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS <i>D. B. Northrip P.O. Box 193 Lovington, NM 88260</i>			
CITY, STATE, ZIP <i>Monument, N.M. 88245</i>		CITY, STATE			
CUSTOMER ORDER NO.	SOLD BY	TERMS	DATE <i>11-1-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish tractor & equipment to plow C & C Land Farm</i>			<i>1400 00</i>
		<i>Thank you</i>			
		<i>De</i>			
		<i>Total</i>			<i>1400 00</i>

Adams 5840

088774

INVOICE

SOLD TO <i>C & C Land Farm</i>		SHIP TO			
ADDRESS <i>P.O. Box 55</i>		ADDRESS  D. B. Northrup P.O. Box 193 Lovington, NM 88260			
CITY, STATE, ZIP <i>Monument, N.M. 88265</i>		CITY, STATE, ZIP			
CUSTOMER ORDER NO.	SOLD BY	TERMS	F.O.B.		
			DATE <i>12-7-02</i>		
ORDERED	SHIPPED	DESCRIPTION	PRICE	UNIT	AMOUNT
		<i>Furnish tractor & equipment to plow C & C Land Farm</i>			<i>1400 00</i>
		<i>I look you</i>			
		<i>for</i>			
		<i>Total</i>			<i>1400 00</i>

Adams 5840



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

January 23, 2003

Lori Wrotenberg
Director

Oil Conservation Division

Mr. Jimmie T. Cooper
C & C Landfarm, Inc.
Box 55
Monument, NM 88265

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0012
C & C Landfarm Inc.,
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico,

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) inspected the C & C Landfarm, Inc. (C&C) commercial surface waste management facility at the above location on November 20, 2002.

Overall the OCD found C&C to have a well maintained, landfarm with good security. Attachment 1 lists the permit deficiencies found at C&C during the inspection and file review. C&C 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 C&C must respond to the permit deficiencies by February 24, 2003.

A review of C&C's file finds that the full amount of \$125,530 financial assurance is current and active.

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

Sincerely,

Martyne J. Kielling
Environmental Geologist

Attachments

xc: Hobbs OCD Office
Eddie Seay
Dennis French

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0012
C&C LANDFARM, INC.

W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico
(January 23, 2003)

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.

The facility is secured with fence and locking gate and has a sign at the entrance. The sign is in good conditions and is legible from 50 feet and contains all items required in the permit (see photo 1).

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

Berms surrounding several cells have been eroded or plowed and are not in good condition (see photo 3, 6 and 7). Berms should be re-constructed to prevent runoff or runoff and to contain a 100 year flood event.

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 twenty (20) feet of any pipelines crossing the landfarm or within twenty (20) feet of any well or well pad located within 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 spread in the cells had been disked accordingly. However, there was a row of contaminated soil piles estimated to be around 10,000 to 15,000 cubic yards that had not been spread. The NMOCD understands that the

soil was delivered between October 21, 2002 to November 14, 2002. C&C must immediately begin spreading these piles into the proper lift thickness.

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

Ponded water was observed within the north caliche pit. The NMOCD understands that there are no contaminated soils in the portion of the pit that has standing water. Ponding of precipitation must be removed within 72 hours of discovery. The contaminated soils in the bottom of the pit must be bermed to contain runoff. If this pit is to be used again in the future C&C must propose a permit modification that will incorporate a collection sump to aid in water collection and removal.

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.

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. However, there is a french drain collection pipe located in the south caliche pit (see Photo 4 and 5). There was no standing water in the south pit.

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.

N/A There are no impoundments located at this facility.

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.

Records were not reviewed at this time. Please submit the inspection, maintenance and tilling logs from for January 1, 2002 through December 31, 2002.

16. H₂S Screening: H₂S 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.

Waste acceptance documentation was not reviewed at this time.

Date in camera was incorrect.



Photo 1. Entrance sign for C&C Landfarm, Inc.



Photo 4. The landfarm within the south pit is dry.



Photo 2. Standing water from rain event in the bottom of the north pit.



Photo 5. The landfarm cell has been tilled and the berms are in good conditions.



Photo 3. Berms surrounding the landfarm cell have been eroded.



Photo 6. Berms surrounding the landfarm cell have been eroded.

Date in camera was incorrect.



Photo 7. Landfarm cells have been tilled. Berms are worn down.



Photo 8. Contaminated soil piles that have not been spread.



Photo 9. Amerada tank battery excavation
Within the landfarm area.



Photo 10. Amerada tank battery excavation
within the landfarm area.

7-8-02

C&C LAND FARM INC.

ORDER #R9769A

NM 711-1-0012 EXPANSION

SW 1/4 NE 1/4 UNIT G

NE 1/4 NW 1/4

SEC 3 T20S R37E

(505)397-2045



















87







Water Pumped out #5



#5 Water Pumped out



#4 Piles of Soil - leveled & disked





Berm work # 2



Berms work in Caliche Pit





Berm work #2



Berm work





AMERADA HESS CORPORATION

SAMUEL W. SMALL, PE
OFFICE 915/758-6741
FAX 915/758-6768

P.O. BOX 840
SEMINOLE, TEXAS 79360
915/758-6700

June 2, 2000

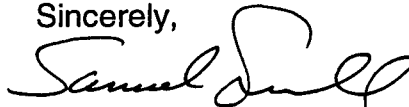
Martyne J. Kieling
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: Landfarm Inspections
Lea County, New Mexico

It has been brought to our attention that the Oil Conservation Division recently conducted inspections of commercial landfarming operations in Lea County. Amerada Hess Corporation would like to receive a copy of the results of the J & L Landfarm and C & C Landfarm inspections. We would also like copies of any Notices of Violation, which may have been issued as a result of the inspections. As prudent operators, we are always concerned that the disposal facilities we use are operated in accordance with all local, state and federal rules and regulations.

If you have any questions, please contact the undersigned at (915) 758-6741.

Sincerely,



Samuel Small, PE
Environmental Coordinator

Xc: Houston Environmental File
PBU Environmental File
Monument File

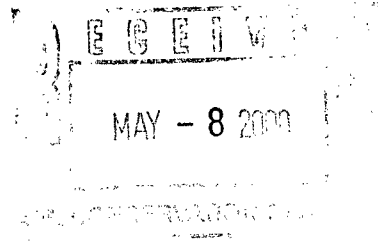
Done. Called
will check Dist off
2/10/01

RECEIVED

MAY 08 2000

Environmental Bureau
Oil Conservation Division

May 3, 2000



NMOCD Environmental Bureau
ATTN: Martyne J. Kieling
2040 South Pacheco St.
Santa Fe, NM 87505

RE: C & C Inspection Response

Dear Mrs. Kieling:

Pursuant to your letter dated 4/24/2000:

- 5) The rain water that had collected in the redbed area at the bottom of the caliche pit has been vacuumed up and the water used for dust control on the roads. Also C & C does not plan to use the pit again unless additional approval from the OCD. Find photos of caliche pit and redbed area.
- 15) We have been maintaining records on the disking, because we use an outside contractor and his invoices reflect the work done. But C & C will start keeping an inspection report as directed. Find within copy of report.

Thank you for your time in this matter. If there is anything else we need, please call.

Sincerely,

Eddie W. Seay, Agent
601 W. Illinois
Hobbs, NM 88242
(505)392-2236

Water
Small amt.
in Redbed pit
Vacuumed up
Pit water on
for Dust control
ok

4/24/00
5-24-00

Landfarm Inspections

Date	Disking	Berms	Trash + Debris	Water	General comments
4/13/00	yes Previous wk 7/98	OK	OK	Small amt. in RedRed hole -- Vacuumed up Pot water on road for dust control 4/17	Inspection made by JCD Montague + Donna + Eddie Sean -
4/27	Recently Disk 24-25	OK	OK	OK	Everything in good shape

RECEIVED

MAY 08 2000

Environmental Bureau
Oil Conservation Division



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 24, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-306

Mr. Jimmie T. Cooper
C & C Landfarm, Inc.
Box 55
Monument, New Mexico 88265

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0012
C & C Landfarm Inc.,
W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico,

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD) inspected the C & C Landfarm, Inc. (C&C) commercial surface waste management facility at the above location on April 13, 2000.

Overall the OCD found C&C to have a well maintained, landfarm with good security. Attachment 1 lists the permit deficiencies found at C&C during the inspection and file review. C&C 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 C&C must respond to the permit deficiencies by May 24, 2000.

A review of financial assurance finds that C&C's \$100,530 assignment of cash collateral No. 5400081306 and \$25,000 assignment of cash collateral No. 100065287 are current and active.

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

Sincerely,

Martyne J. Kielling
Environmental Geologist

Attachments

xc: Hobbs OCD Office
Eddie Seay

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0012
C&C LANDFARM, INC.

W/2 NE/4 and N/2 NW/4, Section 3, Township 20 South, Range 37 East, NMPM,
Lea County, New Mexico
(April 24, 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 one-hundred (100) feet of the boundary of the facility. No contaminated soil will be placed within twenty (20) feet of any pipelines crossing the landfarm or within twenty (20) feet of any well or well pad located within 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.

Ponded water was observed within the North Caleche pit. Ponding of precipitation must be removed within 72 hours of discovery. If this pit is to be used again in the future the C&C must propose a permit modification that will incorporate a collection sump to aid in water collection and removal..

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.

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.

N/A There are no impoundments located at this facility.

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 no records have been kept regarding the inspection and maintenance work performed. Records should indicate that disking is being performed as required (see Permit NM-01-0012 Attachment to Permit Approval: Landfarm Operation #4)

16. H₂S Screening: H₂S 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.

Information on file was reviewed. Documentation included trip tickets and waste acceptance and disposal records. Waste documentation is being kept and maintained as required.

RECEIVED

FEB 17 1998

Environmental Bureau
Oil Conservation Division

RECEIVED

FEB 17 1998

Environmental Bureau
Oil Conservation Division

February 16, 1998

To: Martyne Kieling

From: Wayne Price *W.P.*

Re: C&C Landfarm

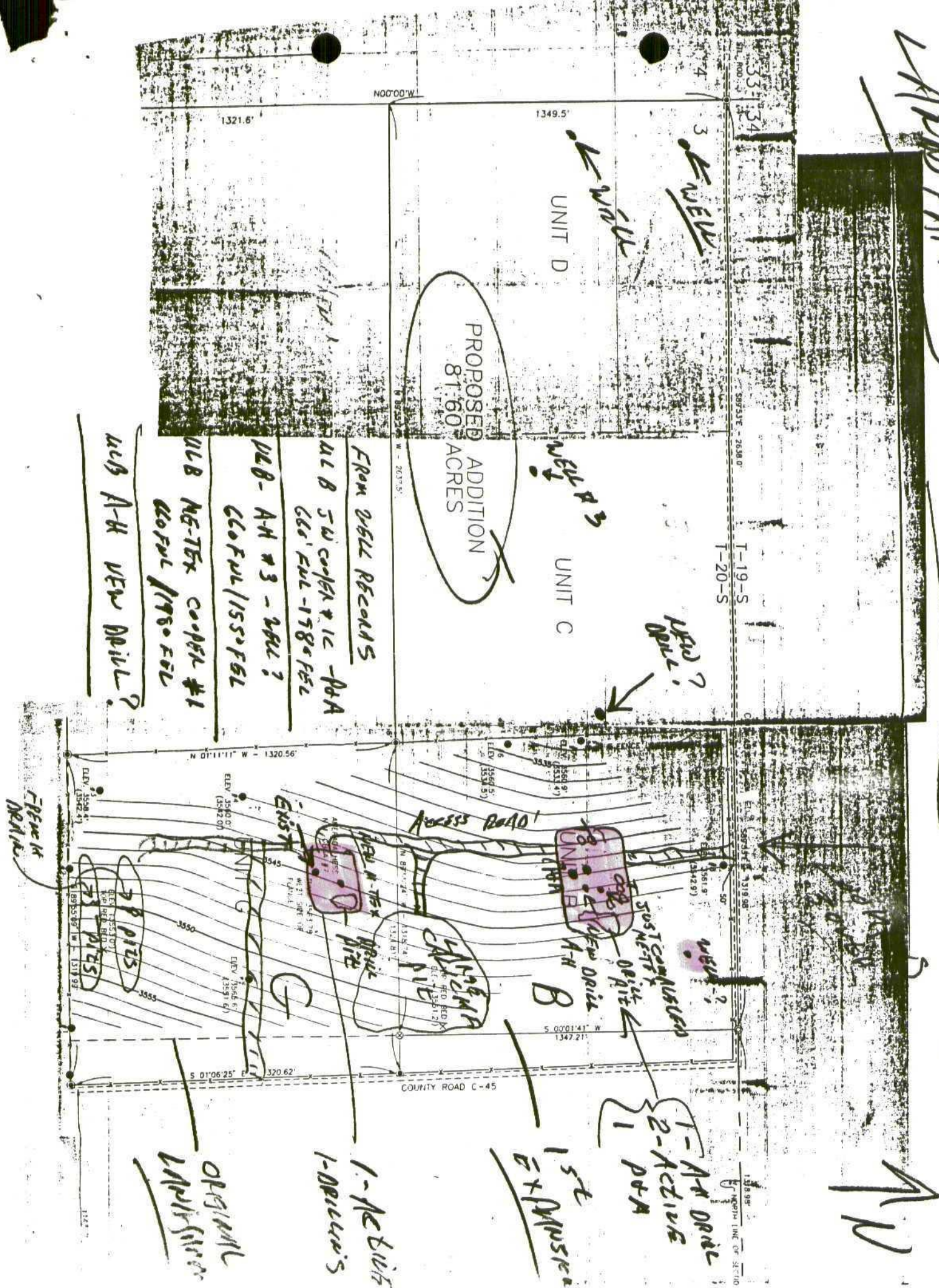
Dear Martyne,

Please find enclosed a rough sketch of the landfarm. I checked the well files and located all of the existing and new drills inside of the landfarm.. I have enclosed pictures for your files.

Recommendations: I recommend that C&C be required to file a detail engineering surveyed drawing of all the wells, tank batteries, buried lines etc after all of this activity. Then I recommend that we have setbacks agreeable to all parties for safety reasons.

Rule 310 - Fire wall

2/16/58



FAX TO: ROGER ANDERSON / MARTYNE KIELING
NMOCD
827-8177

Price, Wayne

To: Martyne Kieling; Roger Anderson
Cc: Chris Williams
Subject: C&C Landfarm- Amerada drilling of new well in C&C landfarm.

Dear Martyne & Roger:

Please note Amerada has been approved to drill a well inside of the C&C landfarm. Evidently, METEX has already drilled one on this same pad.

Amerada is going to use steel pits, but they are planning on using METEX's existing drilling pit (still open) to dispose of the red bed cuttings.

The NMOCD District I office is concerned about any future wells drilled in the landfarm and the disposal of any salt contaminated soils.

Mr. Cooper called and according to him they have worked out an agreement on the drilling part, but he is concerned on what to do with the drilling pit in the future. I informed him under our general rules we allow drilling pits on leases to be decanted of fluids and buried on site if it is not a future threat to the surface or ground water, and this might be a surface issue he would have to work out with the operator or it might be an issue concerning his landfarm permit conditions.

I advised him to contact your office on this issue since NMOCD Bureau handles the landfarm permit conditions and the issue of disposing of any salt contaminated soils into the landfarm.

Mr. Cooper informed me he has stocked piled some salt contaminated soils on site from various locations. I informed him this might be a problem in the fact that this could be considered landfilling in which his permit probably does not allow this. I advised him to contact your office concerning these type of E&P soils.

Recommendations:

NMOCD District I recommends that no addition wells are drilled inside of the landfarm that could impede and/or affect the existing permit conditions and that all E&P waste generated from these drilling activities be removed and/or remediated on-site rather than bury it, or this drilling location within the landfarm be completely isolated from the landfarm operations.

cc: Jim Cooper & Ed Seay C&C Landfarm
Rob Williams & Sam Small Amerada Hess

2-16-97

2 Rigs onsite one well tank Battery ← then 2 more well...
Existing . . . Contaminated Pit . . .
One existing well pads . . . } NW metex completed
↓ south
(Amerada) → well pad . . .

NMOCD INTER-OFFICE CORRESPONDENCE

TO: Martyne Kieling-NMOCD Santa Fe, NM

From: Wayne Price-Environmental Engineer
Date: June 25, 1997
Reference: C&C Landfarm
Subject: Field Trip Pictures of French drains in Caliche Pits.

Comments:

Please find attached photos of landfarm calichie pits. Please note C&C has decided to utilize $\frac{1}{2}$ of the two pits located on the south end of the landfarm. These pits are orientation east-west and lie north and south of each other. There is another large pit located on the north side of the landfarm.

After discussing with Eddie Seay, he indicated all three pits can be utilized per their request, but only $\frac{1}{2}$ of the two pits mentioned above will be used for now.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

1. South Pit looking SE

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

2. North Pit looking NW.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

3. North Pit; standing in middle looking north. Background shows landfarm.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

4. Same as #3.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

5. South Pit; standing in middle looking south.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

6. Same as #5.

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

7.&8. North pit; Bottom of french drain excavated area.

cc: Chris Williams-NMOCD District I Supervisor

file:C&Cpits

attachments-photos



#1
CNO. 1389027

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

1. South Pit looking SE

44444-1241 016



2

NO. 128025

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

2. North Pit looking NW.

NO. 134001



111111-1111 010

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

3. North Pit; standing in middle looking north. Background shows landfarm.

111111-1111 023

3



NN-16HU 019

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

4. Same as #3.

CHG.16HU021

hA



215

HH-8341 010

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

5. South Pit; standing in middle looking south.

HH-8341 019 32



Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

6. Same as #5.

NNN-12AU 010

CHG. 8A>010 3

96



17

SAME AS #8

0007H015 33-81 NH441-6391 010



8/19

CHC-64001

Photos: By: W.Price July 25, 1997
Neg;# 370223. C&C Landfarm, Monument NM

7.48. North pit; Bottom of french drain excavated area.

CHC-64001

22-141 50 SHEETS
22-142 100 SHEETS
22-144 200 SHEETS



NM-1-012

22-141 50 SHEETS
22-142 100 SHEETS
22-144 200 SHEETS



C+C LANDFARM

NM-1-012



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

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

July 9, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-309

Mr. Jimmie T. Cooper
C & C, Landfarm, Inc.
P.O. Box 55
Monument, NM 88265

RE: Landfarm Inspection
C & C, Landfarm, Inc.
SW/4 NE/4 (Unit G) of Section 3, Township 20 South, Range 37 East, NMPM
Lea County, New Mexico

Dear Mr. Cooper:

The New Mexico Oil Conservation Division (OCD), inspected C & C, Landfarm, Inc. (C&C) landfarm located in the SW/4 NE/4 (Unit G) of Section 3, Township 20 South, Range 37 East, NMPM, Lea County, New Mexico, on April 3, 1997.

Overall the OCD found C&C to have a well maintained landfarm with good security. The OCD inspection and current file review of C&C indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at C&C during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. C&C 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 C&C to these deficiencies by September 8, 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. C&C landfarm is included under the new Rule 711. A copy of Order R-10411-B along with the new bond forms were given to Eddy Seay during the OCD inspection on April 3, 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 13.

Please be advised that the bonding requirements have changed under the new Rule 711. C&C's current cash bond (bond No. OCD-391) for \$25,000 will need to be replaced. The bonded amount

Mr. Jimmie T. Cooper

July 9, 1997

Page 2

will be based upon the estimated closure costs that the State of New Mexico would incur if a third party contractor were to remediate the facility (see Rule 711.B.1.i). C&C 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: Hobbs OCD Office

ATTACHMENT 1
INSPECTION REPORT
APRIL 3, 1997

ENVIRONMENTAL PLUS, INC. *CAC*

(SW/4 NE/4 (Unit G) of Section 3, Township 20 South,
Range 37 East, NMPM)
LEA 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 (see Picture 8).

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.

Setbacks along the north and east property line boundaries appear to be less than one-hundred (100) feet. Set backs along pipelines appear to be less than fifty (50) feet. 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 in each cell had been spread and disked accordingly (see pictures 1, 6, 7, 8, and 9) .

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 in the landfarm cells and Plastic bags of trash need to be picked up and disposed of properly (see pictures 4, 6, 7, 8, and 9).

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. **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, tanks, and landfarm cells on the facility;

Some of this is already on file with the OCD. Attached is a copy of what we have in the file please submit an updated facility map that reflects any changes that have been made. Specifically maps/diagrams that show the changes currently being implemented within the pits and any additional cells that have been constructed.

- (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;

This is already on file with the OCD.

- (h) A Hydrogen Sulfide (H_2S) Prevention and Contingency Plan to protect public health;

This is already on file with the OCD.

- (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;

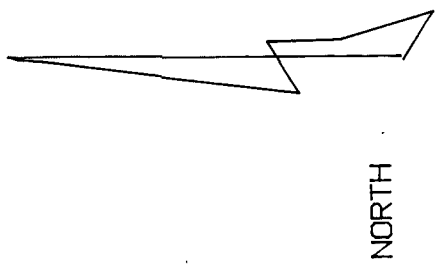
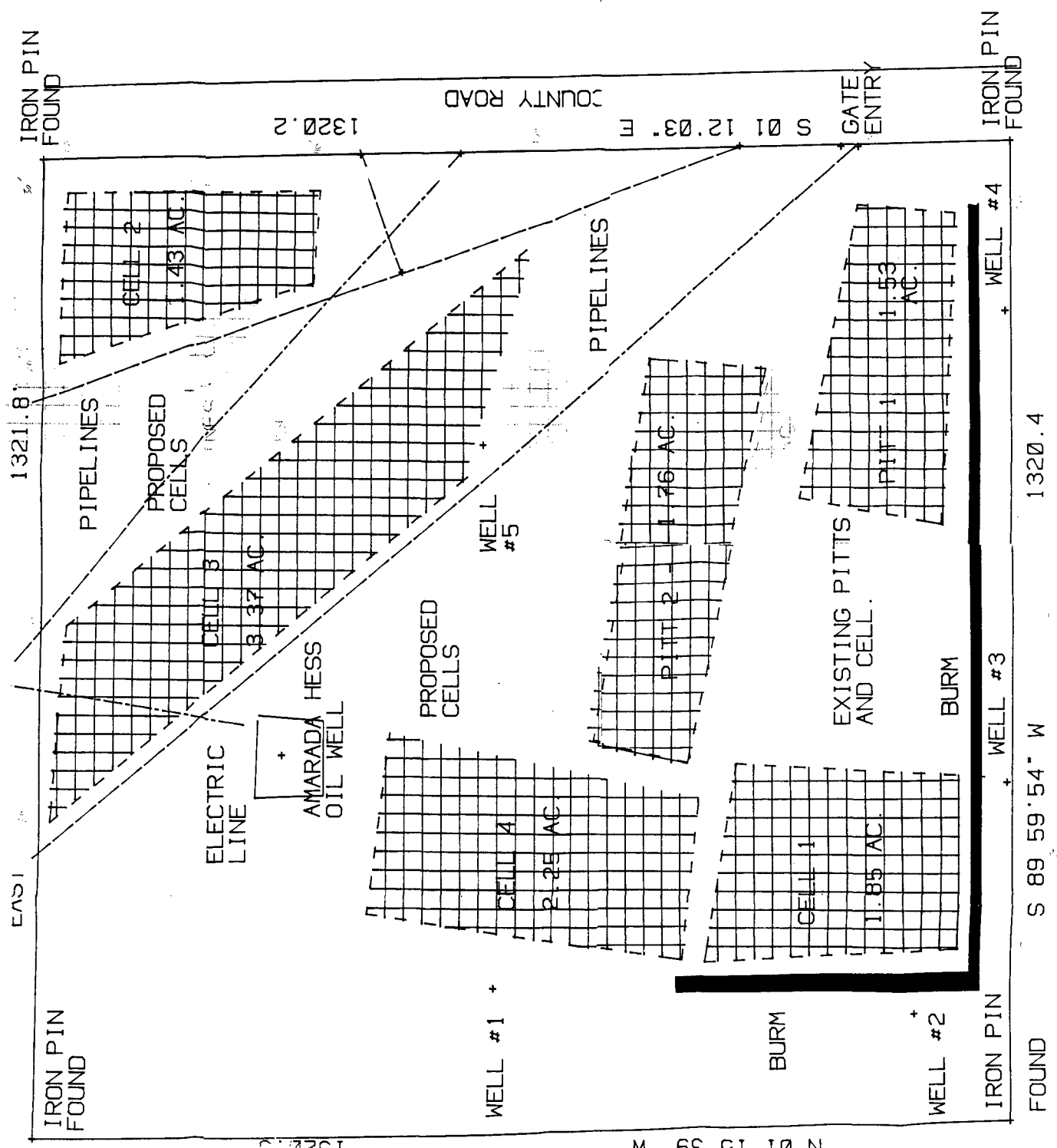
Please submit with C-137 application.

- (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.



MAP HAS BEEN
REDUCED NOT TO SCALE

SURVEY OF THE SURFACE OF
SW 1/4, NE 1/4, SECTION 3
T-20-S, R-37-E, N.M.P.M.
LEA COUNTY, NEW MEXICO.

TRUMAN GASCIN, REGISTERED PUBLIC SURVEYOR, NEW MEXICO No. 11822 AND IS TO THE BEST OF MY KNOWLEDGE TRUE AND CORRECT.

Truman Gascin
TRUMAN GASCIN, REGISTERED PUBLIC SURVEYOR, NEW MEXICO No. 11822

BEFORE THE
OIL CONSERVATION COMMISSION
San Antonio, Texas
Case No. 11822-4
Submitted by CAC LAMARCA, INC.

C&C LANDFARM INSPECTION (PHOTOS BY OCD)

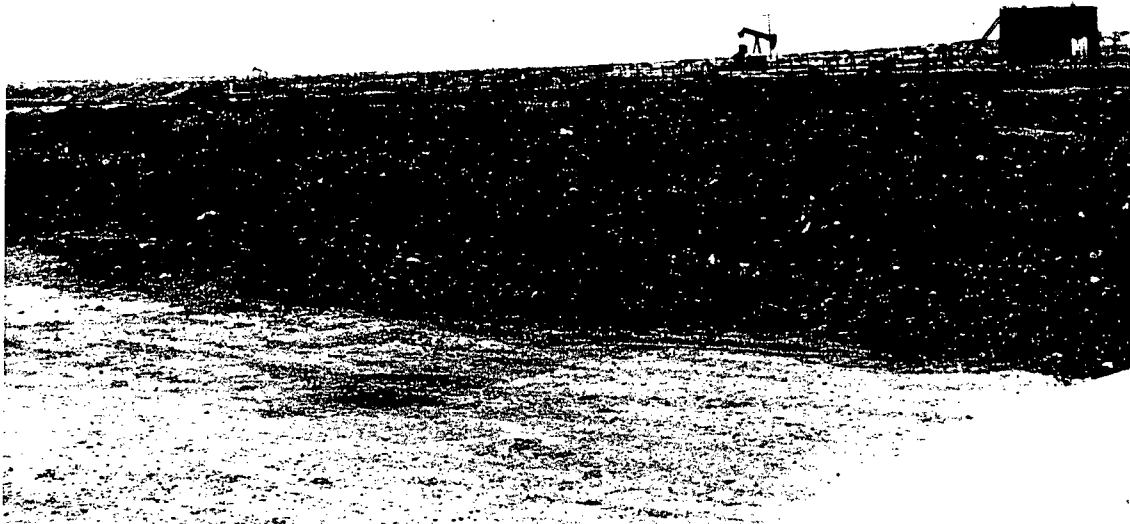


PHOTO NO. 1

DATE: 04/3/97



PHOTO NO. 2

DATE: 04/3/97

C&C LANDFARM INSPECTION (PHOTOS BY OCD)



PHOTO NO. 3 DATE: 04/3/97



PHOTO NO. 4 DATE: 04/3/97

C&C LANDFARM INSPECTION (PHOTOS BY OCD)



PHOTO NO. 5

DATE: 04/3/97



PHOTO NO. 6

DATE: 04/3/97

C&C LANDFARM INSPECTION (PHOTOS BY OCD)



PHOTO NO. 7 DATE: 04/3/97



PHOTO NO. 8 DATE: 04/3/97

C&C LANDFARM INSPECTION (PHOTOS BY OCD)



PHOTO NO. 9

DATE: 04/3/97

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="checked" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 10:30	Date 7/17/97
<u>Originating Party</u> Eddie Seay		<u>Other Parties</u> Martyn	
<u>Subject</u> CnC Land Farm			
<u>Discussion</u> will be Proposing an expansion of ≈ 80 acres to The existing Land Farm.			
<u>Conclusions or Agreements</u>			
<u>Distribution</u>		Signed Martyn J. Kelly	



C n C LAND FARM

4-3-97



CNC LAND FARM

4-3-97



CnC Land Farm

4-3-97



C n C Land Farm

4-3-97



CnC Land Farm

4-3-97



CnC Land Farm

4-3-97



CnC Land Farm

4-3-97



CnC Land Farm

4-3-97



CnC LAWD FARM

4-3-97