

NM1 - 15

INSPECTIONS & DATA



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera
Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

December 10, 2002

Ms. Daniele Beradelli
Rhino Environmental Services, Inc.
200 Sunset Dr.; Suite D
El Paso TX 79922

**RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0015
Goo Yea Landfarm, Inc.
SE/4 of Section 14, Township 11 South, Range 38 East, NMPM,
Lea County, New Mexico**

Dear Ms. Beradelli:

The New Mexico Oil Conservation Division (OCD) inspected the Goo Yea, Inc. (Goo Yea) surface waste management facility at the above location on November 19, 2002.

Overall the OCD found Goo Yea to have a well maintained landfarm with good security. The OCD inspection and file review of Goo Yea indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Goo Yea during the inspection and file review. Goo Yea shall provide OCD with a detailed description of how the corrections will be made and a timetable of when each of the corrections will be completed. Goo Yea must respond to the permit deficiencies by January 21, 2003.

Please be advised that the financial assurance in the amount of \$56,423 currently held by the OCD will need to be increased to \$75,230 by January 10, 2003. If you do not have a copy of the OCD surface waste management facility financial assurance forms you may obtain them from the OCD web site <http://www.emnrd.state.nm.us/ocd/>.

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: Hobbs OCD Office

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0015
GOO YEA, INC.

SE/4 of Section 14, Township 11 South, Range 38 East, NMPM,
Lea County, New Mexico
(December 10, 2002)

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 50 feet and contain the following information: a) name of facility, b) permit number, c) location by section, township and range, and d) emergency phone number.

Facility is secured with fence and locking gate. The sign contains the name of the facility, NMOCD permit number, the legal location and the emergency phone number (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.

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. 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. There are no pipelines at this facility

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 were being disked. The OCD did not review any additional tilling documentation during this inspection.

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.

Plastic was in Cell 3 and large pieces of plastic were along the landfarm roadway (see photo 2). Plastic trash in the landfarm cells must be picked up and disposed of properly (see photo 3).

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 and valve catchments located at this facility.

9. 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.

10. 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.

11. 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

12. 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 There are no open top tanks located at this facility.

13. 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

14. 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.

The OCD did not review records at this time.

15. H₂S Screening: H₂S screening must be recorded and maintained.

N/A.

16. 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 on file associated with the treatment zone monitoring for this facility show that only 4 jobs have been received into the facility since January of 2000 totaling approximately 4836 cubic yards. No additional documentation was reviewed at this time.

Goo Yea Landfarm
OCD Inspection November 19, 2002
NMOCD Permit NM-01-0015

Page 1

Date in camera was incorrect.



Photo 1. Facility sign has large type with permit number, legal location, and phone number.



Photo 3. Plastic on landfarm road.



Photo 2. Plastic in cell 3.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

November 15, 2002

CERTIFIED MAIL

RETURN RECEIPT NO. 7001-1940-0004-3929-8263

Ms. Daniele Beradelli
Rhino Environmental Services, Inc.
P.O. Box 4232
Anthony, NM 88021

RE: OCD Surface Waste Management Facility Permit NM-01-0015
Goo Yea Landfarm, Inc.
Location: SE/4 of Section 14, Township 11 South, Range 38 East, NMPM,
Lea County, New Mexico

Dear Ms. Beradelli:

The New Mexico Oil Conservation Division has reviewed the financial assurance portion of Permit NM-01-0015 for Goo Yea Landfarm, Inc. (Goo Yea). This review finds that a surety bond in the amount of \$56,423 is on file for Goo Yea. According to the permit, Goo Yea is required to submit additional financial assurance by **January 10, 2003** to the amount of **\$75,230**

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

Sincerely,

Martyne J. Kielling
Environmental Geologist

xc: Hobbs 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 20, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-559-573-297

Ms. Daniele Beradelli
Rhino Environmental Services, Inc.
P.O. Box 4232
Anthony, NM 88021

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0015
Goo Yea Landfarm, Inc.
SE/4 of Section 14, Township 11 South, Range 38 East, NMPM,
Lea County, New Mexico

Dear Ms. Beradelli:

The New Mexico Oil Conservation Division (OCD) inspected the Goo Yea, Inc. (Goo Yea) surface waste management facility at the above location on April 11, 2000.

Overall the OCD found Goo Yea to have a well maintained landfarm with good security. The OCD inspection and file review of Goo Yea indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Goo Yea during the inspection and file review. Goo Yea 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. Goo Yea must respond to the permit deficiencies by May 20, 2000.

Please be advised that the financial assurance in the amount of \$25,000 currently held by the OCD will need to be increased to \$37,615 by January 10, 2001. Goo Yea's current bond (No. B05080) for \$25,000 will need to be replaced using the current OCD form. If you do not have a copy of the OCD surface waste management facility financial assurance forms you may obtain them from the OCD web site <http://www.emnrd.state.nm.us/ocd/>.

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

ATTACHMENT 1
INSPECTION REPORT
PERMIT NM-01-0015
GOO YEA, INC.

SE/4 of Section 14, Township 11 South, Range 38 East, NMPM,
Lea County, New Mexico
(April 20, 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. 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. There are no pipelines at this facility

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.

Plastic was present in Cells 1, 2 and 3 and large pieces of a green fiberglass tank were present in Cell 2. Plastic and fiberglass trash in the landfarm cells must be picked up and disposed of properly.

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 and valve catchments located at this facility.

9. 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.

10. 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.

11. 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

12. 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 There are no open top tanks located at this facility.

13. 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

14. 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.

OCD Inspector was unable to review records. Facility operator was not present during inspection.

15. H₂S Screening: H₂S screening must be recorded and maintained.

N/A.

16. 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.*

OCD Inspector was unable to review records. Facility operator was not present during inspection.



**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-326-936-310

Ms. Daniele Berardelli
Rhino Environmental Services, Inc.
5 C.R. 6065
Farmington, NM 87401

RE: Landfarm Inspection
Goo Yea Landfarm, Inc.
SE/4 of Section 14, Township 11 South, Range 38 East, NMPM
Lea County, New Mexico

Dear Ms. Berardelli:

The New Mexico Oil Conservation Division (OCD), inspected Goo Yea Landfarm, Inc. (Goo Yea) located in the SE/4 of Section 14, Township 11 South, Range 38 East, NMPM, Lea County, New Mexico, on April 3, 1997.

Overall the OCD found Goo Yea to have a well maintained landfarm with good security. The OCD inspection and current file review of Goo Yea indicates some permit deficiencies. Attachment 1 lists the permit deficiencies found at Goo Yea during the inspection and the new Rule 711 requirements that are not on file. Attachment 2 contains photographs taken during the inspection. Goo Yea 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 Goo Yea to these deficiencies by September 9, 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. Goo Yea 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 (Daniele Berardelli) 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. Goo Yea's current cash bond (bond No BO-5080.) for \$25,000 will need to be replaced. The bonded amount

Ms. Daniele Berardelli
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). Goo Yea 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,

A handwritten signature in cursive script, reading "Martyne J. Kieling".

Martyne J. Kieling
Environmental Geologist

Attachments

xc: Hobbs OCD Office

ATTACHMENT 1
INSPECTION REPORT
APRIL 3, 1997
GOO YEA LANDFARM, INC.
(SE/4 of Section 14, Township 11 South, Range 38 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.

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 including those in the Goo Yea Landfarm permit of five-hundred (500) feet from the Texas state line.

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 cell 1 had been spread and disked accordingly (see picture 1). Cell 2 contained one load which had not been spread due to wet, rainy conditions (see picture 2).

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 needs to be picked up and disposed of properly (see picture 1).

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, and tanks on the facility;

Please submit an updated facility map that show all current landfarm cells or cells that are under construction.

- (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 (H₂S) 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.

GOO YEA LANDFARM INSPECTION (PHOTOS BY OCD)



PHOTO NO. 1 DATE: 04/3/97



PHOTO NO. 2 DATE: 04/3/97



Goo Yea Land Farm

4-3-97



Goo Yea Land Farm

4-3-97

95 FEB 26 AM 8 52

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone☐ Personal

Time

Date

2/21/96

Originating PartyOther Parties

WAYNE PRICE - NMOCN

SUBJECT

GOO-YEA LANDFARM

Discussion

CALLED ROYCE COOPER - 392-4498

NMOCN FIELD INSPECTOR JAKA GRIFFIN TOOK PICTURES ON 2-16-96.
ATTACHED -

STOCK PILE