

NM1 - 23

INSPECTIONS & DATA



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 14, 2005

Ms. Judy L. Roberts
J&L Landfarm
8301 Eunice Highway
Hobbs, NM 88240

Re: Commercial Surface Waste Management Facility
NMOCD Permit NM-1-023

Dear Ms. Roberts:

The landfarm, permitted as show above, was inspected by the New Mexico Oil Conservation Division (NMOCD) on February 15, 2005. Below are the findings:

1. There appeared to be a problem with plastic at the landfarm. This is a common problem at landfarms in southeast New Mexico, however every effort should be made to minimize this. We realize that you are making strides toward combing the plastic out of the landfarm and sending it to a proper disposal facility. Please keep up, and accelerate these efforts.
2. The berming at the landfarm needs work. Please have these berms built up in areas where they have eroded.
3. The contaminated soils at the facility need to be disked and turned on a more frequent basis. The permit shown above requires that the soils be disked a minimum of every two weeks.
4. Records of the diskings should be kept. A logbook showing the date of the work accomplished and initialed by yourself or the operator of the equipment will be sufficient. Please have these records on hand at the office so that they may be inspected on future inspections by the NMOCD.
5. More effort needs to be made to keep trash and metals out of the landfarm. This material must be removed and disposed of properly.

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

NEW MEXICO OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read "Ed Martin". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Edwin E. Martin
Environmental Engineer

Cc: NMOCD, Hobbs





This picture and the one below show evidence that more frequent disking is required.





Metal in the landfarm. This needs to be removed.











NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Acting Cabinet Secretary

February 13, 2002

Lori Wrotenbery

Director

Oil Conservation Division

CERTIFIED MAIL

RETURN RECEIPT NO. 7001 1940 0004 7923 3781

Ms. Judy L. Roberts
J&L Landfarm, Inc.
P.O. Box 356
Hobbs, NM 88241-0356

**RE: Inspection Report
J&L Landfarm, Inc.
Commercial Surface Waste Management Facility, Permit NM-01-0023
Location: Sec. 9&10, T. 20 S., R. 38 E., NMPM, Lea County, New Mexico**

Dear Ms. Roberts:

The New Mexico Oil Conservation Division (OCD) inspected J&L Landfarm, Inc. (J&L) on June 7, 2001. The OCD found the facility to be well maintained and have good security. A records check was performed and all documentation was in order. A review of the financial assurance portion of Permit NM-01-0023 finds that a letter of credit for your facility in the amount of \$126,000 is on file. However, according to the Permit, J&L is required to submit additional financial assurance by **March 5, 2002** to increase the amount to **\$168,000**. Financial assurance forms can be found on the OCD web site <http://www.emnrd.state.nm.us/ocd/>.

Please give me a call at (505) 476-3488 if you have any questions.

Sincerely

Martyne J. Kielling
Environmental Geologist

Xc: OCD Hobbs Office



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

BETTY RIVERA

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

MEMORANDUM

To: File NM-01-0023, J& L landfarm, OCD Hobbs District office
From: Martyne J. Kielling *mjk*
Date: July 24, 2002
Subject: Complaints about landfarm management at J&L Landfarm, Inc.

In early June 2002 the OCD was notified that J&L landfarm looked like they had not been tilling the facility on the required two-week schedule. I decided to check it out next time I was in the area.

June 26, 2002 I performed a brief inspection looking at the facility from Billy Walker Rd. and took photos of the landfarm cells in question. These cells had an abundance of weeds and there was a pile of contaminated soil that had not been spread. The facility had just finished receiving many loads from the state remediation project at the Goodwin Treating Plant. I made a note to check the status of the cells for approved discontinued maintenance status.

July 12, 2002 the OCD Santa Fe office received a package of photographs taken on July 8, 2002. The photos are only identified by date and location. The pictures are taken from Billy Walker Rd. looking north showing vegetation in the cells and some contaminated soil piles that had not been spread. At this time it is not known from which jobs these piles came from or on what date they were delivered.

July 24, 2002 I checked the discontinued maintenance file for the status of these cells that can be viewed from Billy Walker Rd. According to the facility map that is on file Cells 5, 7, 8 and 10 are all cleaned up and were put on discontinued maintenance status in October 2001. Cells 1, 2, 3, 4, 6, 9 and 15 are all cleaned up and were put on discontinued maintenance status in April of 2002.

July 24, 2002 I spoke to Judy Roberts of J& L landfarm to let her know there had been complaints and had reviewed the file and photos and determined that there were no permit violations, but I would be writing a report for the file.



Photo 1. Taken from Billy Walker Road
looking north



Photo 3. Taken from Billy Walker Road
looking north



Photo 2. Taken from Billy Walker Road
looking north



Photo 3. Taken from Billy Walker Road
looking north

7-8-02



J & L Lard Farm Ken Co N.M

7-8-02

1 hr



J & L Land from Len Co NM

7-8-02

16



56 L Land Farm Lea CO N.M.

7-8-02
12



J + L Land Farm Lea CO NM

7-8-02

12



J & L Land Farm Lea Co N.M.

7-8-02

↙



J & L LAND FARM Hen CO Ann

7-8-02

K



J & L Land Farm Lea CO NM.

7-8-02

12



J & L Land Farm Leb Co NM

7-8-02

1/2



J & L Land Farm Lea Co N.M

7-8-02

1/2



J & L Land Farm Len Co N.M.

7-8-02

Ln



J & L Land Farm Ken Co N.M.

7-8-02

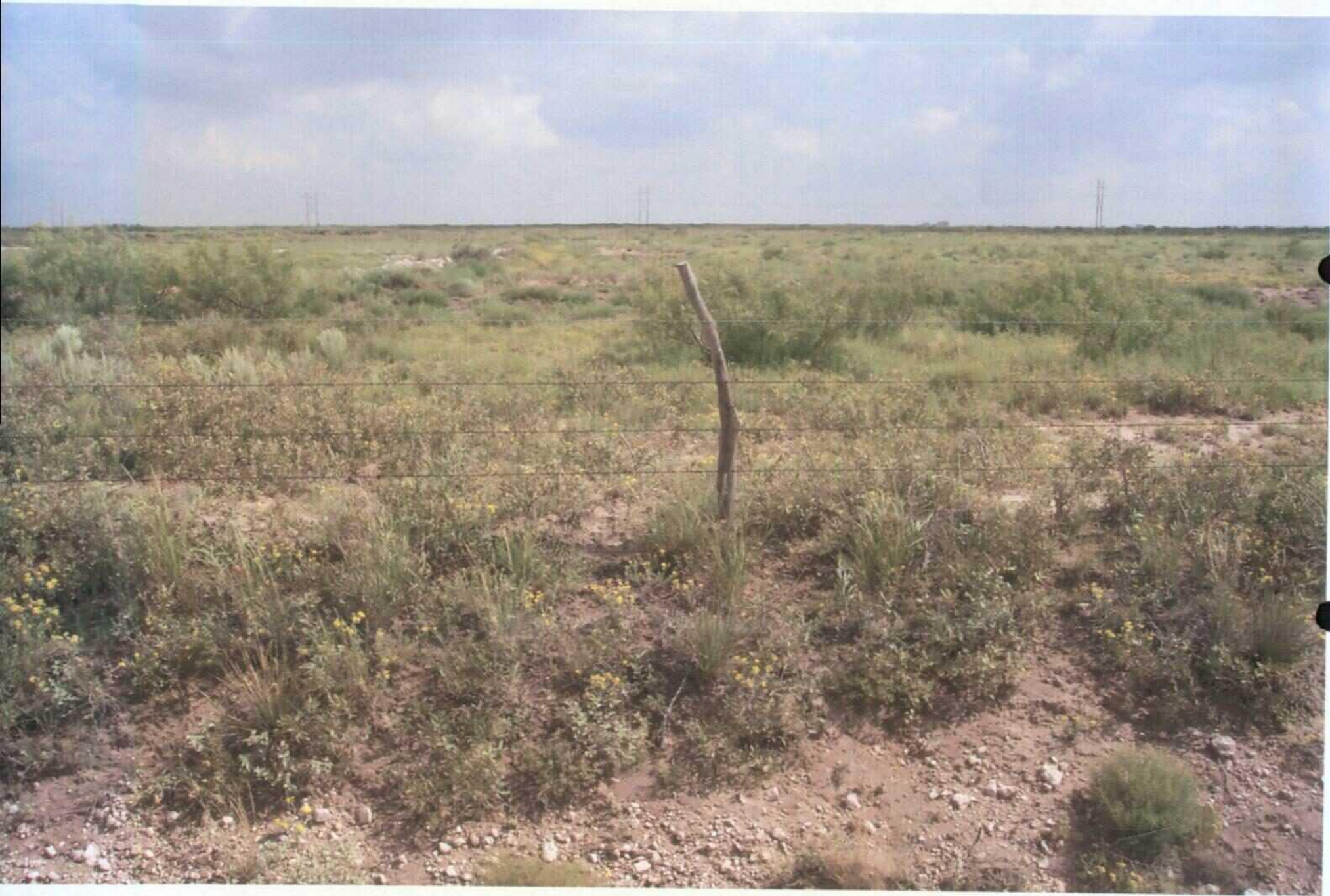
1/2



J & L Land Farm Leno Co IX. 111

7-8-02

Ln



J&L Land Farm Leno Co N.M.

7-8-02

1/2



J + L Land Farm hen co NIM

7-8-02

←



J & L Land Farm

7-8-02

K



J & L Land FARM Leas 60 NM

7-8-02

12



J & L LAND FARM Leno CO N.M

7-8-07
K

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

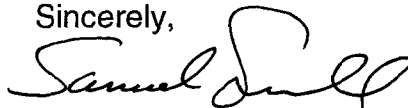
Martyne J. Kieling
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

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

*Called
Done. will Dist. off
check copies then*



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-559-573-303

Ms. Judy L. Roberts
J&L Landfarm, Inc.
P.O. Box 356
Hobbs, NM 88241-0356

RE: Surface Waste Management Facility Inspection Report: Permit NM-01-0023
J&L Landfarm, Inc.
N/2 N/2 of Section 9 and the N/2 N/2 of Section 10, Township 20 South, Range 38
East, NMPM, Lea County, New Mexico

Dear Ms. Roberts:

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

Overall the OCD found J&L to have a well maintained, clean landfarm with good security. The OCD inspection and file review of J&L indicate no permit deficiencies. Attachment 1 lists the permit requirements reviewed during the inspection and file review. No response is necessary to this inspection report.

Please be advised that the financial assurance in the amount of \$84,000 currently held by the OCD will need to be increased to \$126,000 by March 5, 2001. J&L's financial assurance is in the form of a letter of credit (No. 210391571).

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
PERMIT NM-01-0023
J&L LANDFARM, INC.

N/2 N/2 of Section 9 and the N/2 N/2 of Section 10, Township 20 South, Range 38 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. Material such as woody plants and rocks have been incorporated into the berms to help with wind erosion.

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.

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.

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.

Records indicate all disking and facility inspections are being performed as required. Records on file at facility location date back to 1999. To reduce time and paper work for the OCD and for J&L quarterly sampling may be shuffled to place cells 1-8 on the same quarterly schedule.

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.*

Trip tickets and log book records indicate all waste acceptance and disposal records are being kept and maintained as required.

Kielling, Martyne

From: Kielling, Martyne
Sent: Wednesday, October 20, 1999 4:30 PM
To: 'Vance Hall'
Subject: RE: Landfarm Compliance

Vance,

To date the OCD has not issued any notices of non-compliance on these four facilities. All OCD inspections have indicated that these facilities operations are in compliance with their current permit and they are following all applicable rules and regulations of the Division.

The OCD has a revised Rule 711 that covers Surface Waste Management Facilities. Under this rule all existing facility permit requirements are being re-evaluated and new permits are being issued. C&C has completed this process and has a new permit. J&L has a new 711 permit and is a new facility. EPI's permit is currently being re-evaluated and they are requesting to double the size of their facility. CRI is currently operating under Order R-9166. CRI is currently being re-evaluated under the revised Rule 711.

C&C, EPI and J&L are all permitted to landfarm crude oil contaminated soils. Remediation levels must fall below 100ppm TPH, 50ppm BTEX and 10ppm Benzene before the OCD will approve removal of soil for reuse or approve additional lifts of contaminated soil to be added to the cell. CRI is permitted to dispose of crude oil contaminated soils in their landfill. CRI is also permitted to landfarm soils. However, OCD records show that no Landfarm has been constructed.

All Four facilities are permitted to receive exempt and non-exempt crude oil contaminated soils. If Non-exempt waste is to be disposed of the Permitted facility must "Request the Approval to Accept the Solid Waste". A Form C-137 is to be filed by the facility operator with the OCD.

C & C Landfarm Inc., Order/Permit No. R-9769-A/NM-01-0012

Controlled Recovery Inc., Order/Permit No. R-9166/NM-01-0006

Environmental Plus Inc., Permit No. NM-01-0013

J&L Landfarm Inc., Permit No. NM-01-0023

I hope this answers your questions, Files are available at the OCD Hobbs District office and our Santa Fe office if you need further information.

Sincerely

Martyne Kielling
Environmental Geologist

From: Vance Hall[SMTP:hall@hgs-llc.com]
Sent: Wednesday, October 20, 1999 6:07 AM
To: Kielling, Martyne
Subject: Landfarm Compliance

Martyne,

My client, SUNOCO, Inc. (R&M) is considering the disposal of non-exempt

waste at a permitted landfarm. The waste consists of crude oil contaminated soil from SUNOCO's Lea Truck Station in Lea County, NM. Mr. Bill Olson of the NMOCD is handling the case.

Several commercial surface waste management facilities in Lea County are located on the NMOCD website. The sites of interest are:

C & C Landfarm Inc., Order/Permit No. R-9769-A/NM-01-0012
Controlled Recovery Inc., Order/Permit No. R-9166/NM-01-0006
Environmental Plus Inc., Permit No. NM-01-0013
J&L Landfarm Inc., Permit No. NM-01-0023

Mr. Olson has informed me that you would know whether any of these facilities have received notices of violations (NOVs) in the past, and that you would be familiar with their waste management compliance history. Please provide me with the number of NOVs, if any, that each of these four facilities has received.

If the permits for any of the four cited facilities do not allow for the disposal of the described non-exempt waste, please advise me. I sites are listed because they can accept crude oil contaminated soils, even if the waste results from crude oil that has been transported and is non-exempt.

Vance Hall