

NM1 - 32

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 4, 2005

Ms. Kena Kay Cooper
South Monument Surface Waste Facility LLC
P.O. Box 18
Hobbs, NM 88241

Re: South Monument Surface Waste Facility, NMOCD permit NM-1-032

Dear Ms. Cooper:

The New Mexico Oil Conservation Division (NMOCD) inspected the above facility on February 9, 2005 and found it to be a very well maintained site. Disking appeared to be regular and the berms around the cells were in good shape.

A review of your file shows some deficiencies in the submission of reports on treatment zone monitoring. Since the date of the inspection, I have talked with you on the phone and you said that the missing reports would be mailed soon. Thank you.

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

NEW MEXICO OIL CONSERVATION DIVISION

Edwin E. Martin
Environmental Bureau

cc: NMOCD, Hobbs



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

January 24, 2003

Lori Wrotenberg

Director

Oil Conservation Division

Ms. Kena Kay Cooper
South Monument Surface Waste Facility L.L.C.
P.O. Box 418
Hobbs, NM 88241-0418

**RE: Surface Waste Management Facility Inspection Report
South Monument Surface Waste Facility L.L.C..
N/2 NE/4 of Section 25, Township 36 South, Range 20 East, NMPM,
Lea County, New Mexico**

Dear Ms. Cooper:

The New Mexico Oil Conservation Division (OCD) inspected the South Monument Surface Waste Facility L.L.C. (SMSWF) surface waste management facility at the above location on November 20, 2002.

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

A review of SMSWF file finds that financial assurance for \$30,000 is on file. A total of \$43,700 is currently due. The bond paper work has been received, reviewed and has been returned for changes. Please be advised that the final amount of \$58,266 will be due on June 26, 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-01-0032
SOUTH MONUMENT SURFACE WASTE FACILITY, L.L.C.
N/2 NE/4 of Section 25, Township 36 South, Range 20 East, NMPM,
Lea County, New Mexico
(January 24, 2003)

LANDFARM CONSTRUCTION

1. The facility must be fenced and have a sign at the entrance. The sign must be legible from at least 50 feet and contain the following information: a) name of the 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.

2. Contaminated soils may not be placed within twenty (20) feet of any pipeline crossing the landfarm. In addition, no equipment will be operated within ten (10) feet of a pipeline. All pipelines crossing the facility must have surface markers identifying the location of the pipelines.

All set backs have been maintained.

3. The portion of the facility containing contaminated soils must be bermed to prevent runoff and runoff. A perimeter berm no less than three (3) feet above grade with a base of at least four (4) feet must be constructed and maintained such that it is capable of containing precipitation from a one-hundred year flood for the specific region. Individual cells must be contained with a berm no less than three (3) feet above grade with a base of at least four (4) feet.

Berms are in good shape (see photos 1, 2, 3, 4 and 5).

4. 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 pad and curb containment must be able to hold one and one-third the volume of the largest tank or all interconnected tanks. The tanks and containers must be labeled as to contents and hazards.

There are no tanks or drums at this facility.

LANDFARM OPERATION

5. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.

At the time of inspection soils were spread and disked accordingly (see photos 1, 2, 3, 4 and 5).

6. Soils must be spread on the surface in lifts of six inches or less.

Lift thickness appears to be maintained.

7. 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.

There was no standing water in the cells.

8. All trash and potentially hazardous materials should be properly disposed of.

There was no plastic or trash in the landfarm.

9. Within 24 hours of receiving notification from the OCD that an objectionable odor has been detected or reported, the facility must implement the response procedure outlined in the permit.

A file review finds that the NMOCD has not received any notification regarding odors since the facility was permitted May 26, 2000.

REPORTING

10. Analytical results from the treatment zone monitoring must be submitted to the OCD Santa Fe office within 30 days of receipt from the laboratory.

The NMOCD has on file treatment zone monitoring results for cell B-1 submitted on February 22, 2001. The NMOCD has not received any additional quarterly treatment zone monitoring results. South Monument Surface Waste Facility must submit all of the quarterly treatment zone monitoring results since the facility was permitted.

Background analysis was submitted on September 18, 2000 and is on file.

11. Records of landfarm inspections and maintenance must be kept and maintained for OCD review.

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

12. South Monument Surface Waste Facility L.L.C. must notify the **OCD Santa Fe and Hobbs offices within 24 hours** of any fire, break, leak, spill, blow out or any other circumstance that could constitute a hazard or contamination in accordance with OCD

Rule 116.

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

13. Comprehensive records of all material disposed of at the facility must be maintained at the facility. The records for each load must include: 1) generator; 2) origin; 3) date received; 4) quantity; 5) certification of waste status as exempt or non-exempt with any necessary supporting documentation to certify non-hazardous status for non-exempt waste; 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. A file review shows there are no Form C138's on file and that the facility has never requested authorization to accept any non-exempt waste.

14. Analytical results regarding remediated soil must be submitted to the OCD Santa Fe office, with a copy to the Hobbs District office, along with any request to close the cell, apply successive lifts or remove the remediated material.

The NMOCD has not received any cell closure requests.

15. The OCD must be notified prior to any design changes to the landfarm facility. The facility must submit for approval any design changes to the facility to the OCD Santa Fe office and Hobbs District office.

The NMOCD has not received any notifications regarding design changes or permit modifications.



Photo 1. Landfarm Cell B3.



Photo 2. Landfarm Cell B4.



Photo 3. Landfarm Cell B5.

Date in camera was incorrect.



Photo 4. Landfarm Cell B 6



Photo 5. Landfarm Cell B 7



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

April 21, 2000

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

CERTIFIED MAIL

RETURN RECEIPT NO. Z-559-573-302

Ms. Kena Kay Cooper
South Monument Surface Waste Facility L.L.C.
834 W. Gold
Hobbs, NM 88240

**RE: Surface Waste Management Facility Inspection Report
South Monument Surface Waste Facility L.L.C..
N/2 NE/4 of Section 25, Township 36 South, Range 20 East, NMPM,
Lea County, New Mexico**

Dear Ms. Cooper:

The New Mexico Oil Conservation Division (OCD) inspected the South Monument Surface Waste Facility L.L.C. (South Monument) surface waste management facility at the above location on April 12, 2000. At the time of this inspection the South Monument facility had not yet been constructed. Attachment 1 contains photographs taken during the location inspection.

Please be advised that the financial assurance in the amount of \$25,000 will need to be submitted for approval within 30 days of receiving the permit approval. 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/>.

As you requested, I have enclosed examples of quarterly reports that have been submitted by other permitted landfarm facilities. I researched your question regarding maintaining a 20 foot buffer zone on inactive pipelines. The South Monument permit will include a 20 foot buffer on all pipelines (active or inactive) crossing the facility. The reason for this is the possibility that lines may have leaked in the past and left behind contamination and this would conflict with your treatment zone monitoring requirements. The other possibility is that the line may have product still in it. If South Monument landfarm equipment broke it would cause contamination to spread. Cleanup and removal of that material would be required under your 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:
South Monument Surface waste Facility L.L.C.



Photo 1 4-12-00 Looking West



Photo 2 4-12-00 Looking Northwest



Photo 3 4-12-00 Looking North