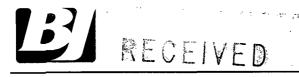
GW - 1

# PERMITS, RENEWALS, & MODS



#### 2008 JUL 30 PM 12 SERTIFIED MAIL NO. 7007 0710 0003 8375 2659 RETURN RECEIPT REQUESTED

New Mexico Environmental Department Oil Conservation Division Attn: Leonard Lowe 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: GW-017 Discharge Permit

Special Condition 16 Follow-up Report

BJ Services Company, U.S.A.

11211 FM 2920 Tomball, TX 77375

#### Dear Mr. Lowe:

The BJ Services Company, U.S.A. (BJ Services) 5514 Carlsbad Highway, Hobbs District was inspected on May 16 2008, as a part of New Mexico Oil Conservation Division's (NMOCD) Discharge Permitting process. The final permit was issued on May 19, 2008 and a signed copy was sent to the NMOCD via UPS on June 10, 2008. As required by Special Condition 16 BJ Services is submitting this follow-up report to confirm that the following items have been addressed:

- 1. The schematic submitted with the discharge plan application does not appear to be correct. (Photo 1) shows a containment area that does not appear on the schematic. The "Chemical Storage Building" appears to be a storage area only;
- 2. Two containers full of soil are not labeled; and
- 3. Empty container storage area needs to have proper impermeable pad with curbing.
- Photo 1 from the OCD's inspection report indicated a containment area that was not included on the schematic of the discharge plan. This containment has been included on the schematic and a revised copy is enclosed with this submittal. The "Chemical Storage Building" does house chemicals in 5-gallon containers as well as items that are not chemicals and BJ Services will maintain the "Chemical Storage Building" nomenclature for this structure.
- 2. The unlabeled containers have been labeled as shown in the enclosed Photo A.



3. As shown in the enclosed Photo B, the empty containers are now kept in an appropriate containment.

BJ Services appreciates your time and if there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette

**HSE Specialist** 

Cc: Jeff Day -

Blake Čox –

BJ Chemical Services, Hobbs

Jane Con India

BJ Services, Odessa Tool Services

Jason Goodwin -

BJ Chemical Services, Houston

File -

BJ Services, Tomball

Enclosures (2)

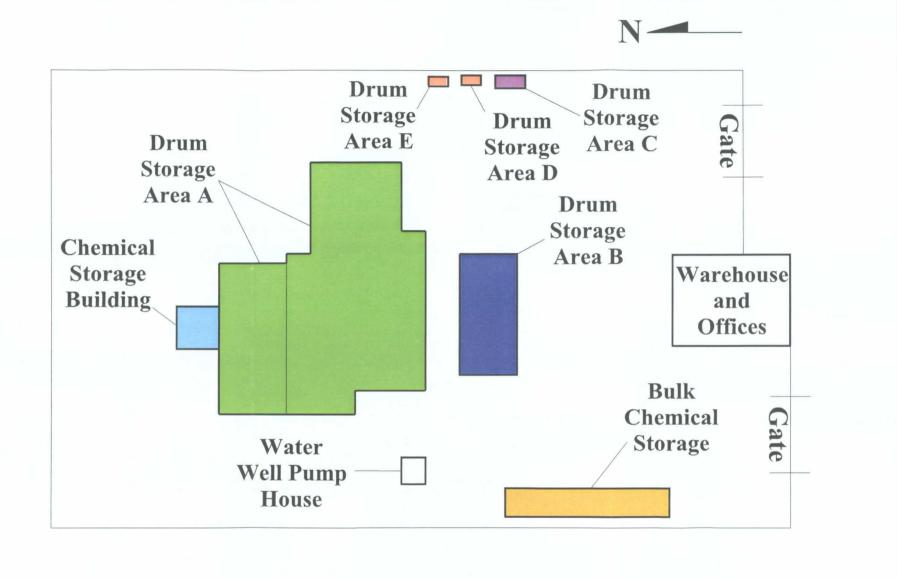




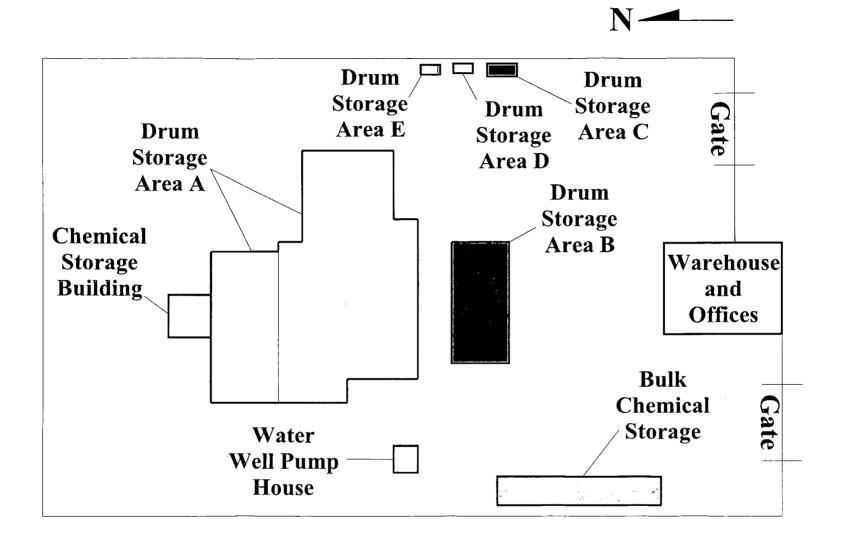
Figure	2:	Facility	Layout
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Hobbs Tools 5514 Carlsbad Highway Hobbs, NM 88240

Not To Scale

REVISION DATE: 7/21/08

DRAWN BY: JSG



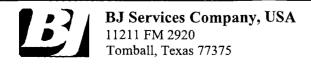


Figure	2:	F	acility	Layout

Hobbs Tools 5514 Carlsbad Highway Hobbs, NM 88240
5514 Carlsbad Highway
Hobbs, NM 88240

#### **Photo A: Labeled Containers**



Photo B: Empty Container Containment





**UPS** Overnight

New Mexico Environmental Department Oil Conservation Division Attn: Leonard Lowe 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: Discharge Permit GW-017

BJ Services Company, USA 11211 FM 2920

Tomball, TX 77375

Dear Mr. Lowe:

Enclosed is the signed Discharge Permit for a new BJ Services Company, USA Facility located at 5514 Carlsbad Highway, Hobbs, NM.

If there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette

**HSE Specialist** 

Cc: Jim Britton – BJ Chemical Services, Hobbs

Jason Goodwin – BJ Chemical Services, Houston

Blake Cox - BJ Services, Odessa Tool Services

File - BJ Services, Tomball

Enclosure

#### ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for an Oil and Gas Service Company is \$1700.00. This fee was received along with your application and was processed on March 12, 2008. Please submit the signed certification item 23 of this document to the OCD office.
- 2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on April 18, 2013 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.
- 3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments: The owner/operator shall abide by all commitments submitted in its March 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications: WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- **6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

- A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- **8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- 9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.
- 10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

#### 11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

- **B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.
- C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.
- **D.** The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

#### 12. Underground Process/Wastewater Lines:

- A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.
- **B.** The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that

inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.
- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- **16. OCD Inspections:** The OCD performed an inspection on May 16, 2008 of this facility. The condition of the facility was in good standing. Below are concerns that need to be addressed.
  - 1. The schematic submitted with the discharge plan application does not appear to be correct. (Photo 1) shows a containment area that does not appear on the schematic. The "Chemical Storage Building" appears to be a storage area only. BJ Services personnel on location were made aware of this inconsistency.
  - 2. (Photo 2) Two containers full of soil are not labeled.
  - 3. (Photo 3) Empty container storage area needs to have proper impermeable pad with curbing.
  - BJ Services has **90 days** to address these concerns and shall submit to the Santa Fe OCD office a report, with photos, the resolution to these items.
- 17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.
- 18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An unauthorized discharge is a violation of this permit.</u>
- 19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

#### 20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22.** Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

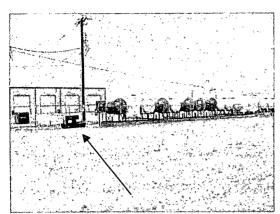
Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

BJ Services Company, U.S.A. Company Name-print name above
Company Name-print name above
Jo Ann Cobb
Company Representative- print name
Op ann Coll
Company Representative- Signature
Title Mg1. Env. Services
Date: 6-6-08

Inspectors: Leonard Lowe

Company Rep: Mr. Jeff Day and Mr. Dean Duarte

Time: 07:10 – 07:40



Date: 05.14.08

Photo 1: Containment area is not noted on facility schematic.



Photo 2: Two unidentified containers.

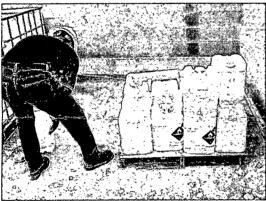


Photo 3: Empty container storage area without proper containment.

Page 1



#### **Bill Richardson**

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



May 19, 2008

Mr. Josh Morrissette BJ Services Co. USA 11211 FM 2920 Tomball, TX 77375

Re:

Discharge Permit Renewal

Hobbs Tooling Gas and Oil service company (GW-017) Section 36, Township 18 South, Range 37 East, NMPM,

Lea County, New Mexico,

Dear Mr. Morrissette:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the BJ Services CO, USA (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wavne Price

Environmental Bureau Chief

Attachments-1

xc: OCD District Office

#### ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

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- 19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

#### 20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22.** Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Company Name-print name above		
Company Representative- print name	-	
Company Representative- Signature		
Title		
Date:		

Inspectors: Leonard Lowe

Company Rep: Mr. Jeff Day and Mr. Dean Duarte
Time: 07:10 – 07:40

Date: 05.14.08



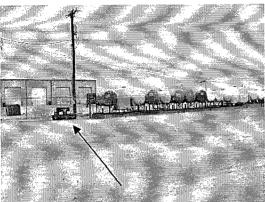


Photo 1: Containment area is not noted on facility schematic.



Photo 2: Two unidentified containers.



Photo 3: Empty container storage area without proper containment.

#### Lowe, Leonard, EMNRD

From:

Lowe, Leonard, EMNRD

Sent:

Tuesday, April 01, 2008 8:49 AM

To:

Mr. Josh Morrissette

Cc:

Johnson, Larry, EMNRD

Subject:

GW-017, Administratively Complete

Attachments: GW-017, Admin Complete Letter.pdf; GW-017, Draft Permit.pdf; GW-017 OCD PN.pdf

Mr. Josh Morrissette,

Your submitted renewal application for the BJ Services Hobbs Oil and Gas Service Company, GW-017 has been deemed **administratively complete**.

Attached is the Admin. Complete letter, <u>Draft Permit</u> and the <u>Divisions public notice</u> for your records.

The department will now receive your version of public notice for review.

If you have any questions please call or e-mail me.

Thank you for your attention.

llowe

#### **Leonard Lowe**

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492

Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us

Website: http://www.emnrd.state.nm.us/ocd/



#### **Bill Richardson**

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



April 1, 2008

Mr. Josh Morrissette,

Re: Discharge Plan Renewal Permit GW-017

BJ Services CO, USA

Hobbs Tools Oil and Gas Service Facility

Lea County, New Mexico

Dear Mr. Morrissette:

The New Mexico Oil Conservation Division (NMOCD) has received BJ Services CO, USA's request and initial/facility fee, dated March 7<sup>th</sup>, 2008, to renew GW-017 for the Hobbs Tools Oil and Gas service company, 5514 Carlsbad Highway, Hobbs, N.M. located in Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or <a href="leonard.lowe@state.nm.us">leonard.lowe@state.nm.us</a>. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe

Environmental Engineer

xc: OCD District I Office, Hobbs



#### **Bill Richardson**

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



April 1, 2008

Mr. Josh Morrissette BJ Services Co. USA 11211 FM 2920 Tomball, TX 77375

Re: DRAFT Discharge Permit Renewal

Hobbs Tooling Gas and Oil service company (GW-017) Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico,

Dear Mr. Morrissette:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the BJ Services CO, USA (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the Staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price Environmental Bureau Chief

Attachments-1

xc: OCD District Office



#### ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for an Oil and Gas Service Company is \$1700.00. This fee was received along with your application and was processed on March 12, 2008. Please submit the signed certification item 23 of this document after the final permit is issued in approximately 45 days.
- 2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on April 18, 2013 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.
- 3. Permit Terms and Conditions: Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments: The owner/operator shall abide by all commitments submitted in its March 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications: WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

Mr. Josh Morrissette BJ Services CO, USA GW-017 <u>DRAFT</u> April 1, 2008 Page 3

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

- A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- **8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- 9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.
- 10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

#### 11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

Mr. Josh Morrissette BJ Services CO, USA GW-017 <u>DRAFT</u> April 1, 2008 Page 4

- **B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.
- C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.
- **D.** The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

#### 12. Underground Process/Wastewater Lines:

- A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.
- **B.** The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that

inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.
- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- **16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.
- 17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.
- 18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An</u> unauthorized discharge is a violation of this permit.
- 19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.
- 20. Additional Site Specific Conditions: N/A
- 21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

- **22.** Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.
- 23. Certification: (Owne r/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

<u>Conditions accepted by</u>: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Company Name-print name above	_
Company Representative- print name	_
Company Representative- Signature	
Title	
Date:	

#### NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-017) BJ Services CO, USA, 11211 FM 2920, Tomball, TX 77375 has submitted a renewal application for their previously approved discharge plan permit for their Hobbs Tooling Oil and Gas Service Company, 5514 Carlsbad Highway, Hobbs N.M. 88240, located in Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. The facility provides cementing, acidizing, and fracturing services at oil and gas well sites. Approximately 100 gallons of residual tank clean out, 100 gallons of off-spec chemicals and several barrels (thousands of gallons) of corrosion inhibitor/Biocides/Paraffin's will be stored onsite within a bermed padded area. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 20 feet, with a total dissolved solids concentration of approximately 300 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <a href="http://www.emnrd.state.nm.us/ocd/">http://www.emnrd.state.nm.us/ocd/</a>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espan®l, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1th day of April

### STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 3/6/08
or cash received on in the amount of \$ 1700
from 35 Services Co.
for GW-17
Submitted by: Lower Corner Date: 3/12/08
Submitted to ASD by: Laurence Concers Date: 3/0/08
Received in ASD by: Date:
Filing Fee New Facility Renewal
ModificationOther
Organization Code <u>521.07</u> Applicable FY <u>2004</u>
To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment

### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

			7/./~
I hereby acknowledge receip	ot of check No		dated
or cash received on	in the amount of	\$ 100	<u>2</u>
from BJ Servi		'.	
for GW-17	·		
Submitted by: LAWY 7	_	<u> </u>	3/12/02
Submitted to ASD by:	urua Ford	Date:	3/12/08
Received in ASD by:		•	
Filing Fee	New Facility	Renewal	
Modification	Other	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
Organization Code 52	1.07 Appli	cable FY 2004	
To be deposited in the Water	Quality Management	Fund.	
Full Payment	or Annual Increment	· <del></del>	



### 2008 MAR 10 PM LPSOTVERNIGHT

New Mexico Oil Conservation Division Attn: Mr. Leonard Lowe 1220 South St. Francis Dr. Santa Fe, NM 87505

RE: Discharge Plan Renewal & Associated Filing Fee Discharge Permit - GW-17

BJ Services Company, USA

11211 FM 2920 Tomball, TX 77375

Dear Mr. Lowe:

Enclosed is the discharge plan renewal application for the BJ Services Company, USA (BJ Services) Hobbs Facility operating under Discharge Permit No. GW-17 located at 5514 Carlsbad Highway, Hobbs, NM. Also enclosed is check number 3234511 in the amount of \$1,800.00 for payment of the associated filing fee.

In accordance with NMAC Subsection C of 20.6.2.3108, relating to discharge plan renewal notifications, BJ Services will place public notification in the Hobbs News-Sun newspaper once the application has been approved.

If there are any questions or comments, please contact me at (281) 357-2573.

Thank You.

Josh Morrissette

**HSE Specialist** 

Cc: File – BJ Services, Tomball

District I – OCD, Hobbs

**Enclosures** 

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

#### State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

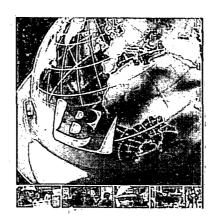
Revised June 10, 2003

# DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

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

	☐ New 🗷 Renewal ☐ Modification
1.	Type: OIL FIELD SERVICES
2.	Operator: BJ SERVICES COMPANY, U.S.A.
	Address: 5514 Carlsbad Highway, HOBBS, NM 88240
	Contact Person:JOSH MORRISSETTEPhone:281.357.2573
3.	Location:/4/4 Section36Township18Range37EAST
4.	Attach the name, telephone number and address of the landowner of the facility site.
5.	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6.	Attach a description of all materials stored or used at the facility.
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10	Attach a routine inspection and maintenance plan to ensure permit compliance.
11	Attach a contingency plan for reporting and clean-up of spills or releases.
12	Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
1	14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the pest of my knowledge and belief.
]	Name: Josh morrissette Title: HSE SPECIALIST
<b>6</b>	Signature:
]	E-mail Address: joshua.morrissette@bjservices.com

# Hobbs Tools Discharge Plan



BJ Services Company, USA 5514 Carlsbad Hwy. Hobbs, NM 88240

# BJ Services Company, U.S.A. Discharge Plan Hobbs, New Mexico

## March 2008

# I. Type of Operation

BJ Services Company, U.S.A. provides oilfield services, including cementing, acidizing, and fracturing services at oil and gas well sites.

## II. Operator

BJ Services Company, U.S.A. (ServicesTools) 5514 Carlsbad Hwy Hobbs, NM 88240 Contact: Blake Cox 432-530-0016

BJ Services Company, U.S.A. (Chemical Services) 707 N. Leech Hobbs, NM 88240 Contact: Jeff Day 505-393-7751

## III. Location

See attachment 1, Figure 1 – Site Location Map

## IV. Landowner of Facility Site

BJ Services Company, U.S.A. 11211 FM 2920 Tomball, TX 77375 Contact: Jo Ann Cobb, R.E.M. 281-357-2572

# V. Facility Description

See attachment 1, Figure 2 – Facility Layout

# VI. Materials Stored or Used at the Facility

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
Degreaser	various	Liquid	Drum	55 - gal	Shop
Spray Paint	various	Liquid	Cans	5 - gal	Shop
AL-133	Biocide	Liquid	Storage Tank	80 - gal	Bulk Chemical Storage
AL-160	Biocide	Liquid	Storage Tank	220 - gal	Bulk Chemical Storage
KTL-22W	Water Based Scale Inhibitor	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
RPD-02211	Aromatic/Aliphatic Paraffin Solvent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TC-410	Water Based Cleaning Agent	Liquid	Storage Tank	220 - gal	Bulk Chemical Storage
TCX-3125	Aromatic/Aliphatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TCX-3740	Alcohol Based Corrosion Inhibitor	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
TH-302	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-3036	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-3113	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TH-315	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-324	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TH-369W	Water/Alcohol Based Corrosion Inhibitor	Liquid	Storage Tanks	1,500 - gal	Bulk Chemical Storage
TH-5324	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TS-161	Aromatic/Aliphatic Paraffin Solvent	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TS-164	Aromatic Paraffin Solvent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TW-4273	Water Based Cleaning Agent	Liquid	Storage Tank	80 - gal	Bulk Chemical Storage
TW-447	Water Based Cleaning Agent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TW-467	Water Based Cleaning Agent	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
AL-133	Biocide	Liquid	5 - gal pail	20 -gal	Chemical Storage Building
AL-160	Biocide	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
METHAN OL	Methanol	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
RPD-03085	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TB-100	Oil Based Demulsifier	Liquid	5 - gal pail	100 - gal	Chemical Storage Building
TB-4314	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-410	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-420	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-436	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TCX-3220	Aromatic Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TH-369W	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-370	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-5324	Aromatic Corrosion Inhibitor	Liquid	5 - gal pail	110 - gal	Chemical Storage Building
TH-606	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-756	Water Based Scale Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-161	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-163	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-164	Aromatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-175	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	10 - gal	Chemical Storage Building
TS-270	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-2817	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	55 - gal	Chemical Storage Building
TW-4222	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-425	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-4273	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-438	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-447	Water Based Cleaning Agent	Liquid	5 - gal pail	110 - gal	Chemical Storage Building
TW-467	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
KTL-22W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
Methanol	Methanol	Liquid	Drum	550 - gal	Drum Storage Area A
NH7003	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
RCI-05125	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
REB-02125	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
REB-04327	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
REB-06167	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
RIS-03297	Water Based Scale Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
RPD-02211	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
RPD-03085	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
RPI-03071	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	55 - gal	Drum Storage Area A

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TB-100	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-104	Oil Based Demulsifier	Liquid	Drum	55 -gal	Drum Storage Area A
TB-5902	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-5916	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-5942	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-5979	Oil Based Demulsifier	Liquid	Drum	330 -gal	Drum Storage Area A
TB-5986	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-832	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-8811	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-916	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-917	Oil Based Demulsifier	Liquid	Drum	330 -gal	Drum Storage Area A
TB-9421	Oil Based Demulsifier	Liquid	Drum	55 - gal	Drum Storage Area A
TB-9551	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-9614	Oil Based Demulsifier	Liquid	Drum	55 - gal	Drum Storage Area A
TB-974	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-976	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-979	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
TB-986	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TC-405	Water Based Scale Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
TC-410	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area A
TC-4402	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area A
TCX-3220	Aromatic Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
TEG	Triethylene Glycol	Liquid	Drum	220 - gal	Drum Storage Area A
TH-302	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
TH-315	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
TH-324	Aromatic Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
TS-159	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
TS-161	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
TS-163	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
TS-164	Aromatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
TS-175	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	110 - gal	Drum Storage Area A
TS-253	Water Based Paraffin Dispersant	Liquid	Drum	110 - gal	Drum Storage Area A
TS-270	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
TS-2710	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
TS-275	Water Based Paraffin Dispersant	Liquid	Drum	220 - gal	Drum Storage Area A

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Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TS-2817	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	330 -gal	Drum Storage Area A
TS-2917	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	110 - gal	Drum Storage Area A
UI-3141	Water Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
WCX-5121	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
AL-125	Biocide	Liquid	Drum	220 - gal	Drum Storage Area B
AL-133	Biocide	Liquid	Drum	220 - gal	Drum Storage Area B
AL-137	Biocide	Liquid	Drum	110 - gal	Drum Storage Area B
AL-160	Biocide	Liquid	Drum	220 - gal	Drum Storage Area B
PSI-720	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B
RDF-03266	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
RFO-02238	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
RFO-03311	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
RFO-04142	Water Based Foamer	Liquid	Drum	660 - gal	Drum Storage Area B
RFO-06209	Water Based Foamer	Liquid	Drum	44 - gal	Drum Storage Area B
TC-2420	Water Based Cleaning Agent	Liquid	Drum	110 - gal	Drum Storage Area B
TC-420	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TC-436	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TCX-3700	Water Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TCX-3740	Water Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TF-5550	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
TF-5561	Water Based Foamer	Liquid	Drum	330 -gal	Drum Storage Area B
TF-570	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
TF-578	Water Based Foamer	Sticks	Box	1	Drum Storage Area B
TF-579	Water Based Foamer	Sticks	Box	1	Drum Storage Area B
TH-356	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-366	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-368	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	440 - gal	Drum Storage Area B
TH-370	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-3743	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-377	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-3921	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-5798	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TH-604	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-606	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-6316	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-6389	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-701	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-704	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-756	Water Based Scale Inhibitor	Liquid	Drum	660 - gal	Drum Storage Area B
TH-758W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-760	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-765	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-767	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-781	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-790W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-793	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-794	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B
TH-798	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TW-401	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-425	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-430	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TW-438	Water Based Cleaning Agent	Liquid	Drum	110 - gal	Drum Storage Area B
TW-447	Water Based Cleaning Agent	Liquid	Drum	1,100 - gal	Drum Storage Area B
TW-4471	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-467	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
Uniklor B	Bleach	Liquid	Drums	165 - gal	Drum Storage Area C
Uniklor C	Sodium Chlorite	Liquid	Drums	220 - gal	Drum Storage Area C
Uniklor A	Hydrochloric Acid	Liquid	Drums	110 - gal	Drum Storage Area D

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# VII. Sources of Effluent and Waste Solids

Waste Type	Source and Composition	Volume per Month	Major Additives
Tank Residual from Clean- outs	Storage Tank	100 gallons	Varies by product
Off-Spec Chemical	Storage Tank	100 gallons	Varies by product
Gloves, Absorbent socks, and rags	Operations	50-lbs	Varies by product

# VIII. Current Liquid and Solid Waste Collection/Treatment/Disposal Procedures

Waste Type	On Site Handling	Disposal	Disposal Facilities
Tank Residual from Clean- outs	Stored in drums	Offsite Disposal	Univar 311 Lark Ave Odessa, TX 79760
Off-Spec Chemical	Stored in drums	Offsite Disposal	Univar 311 Lark Ave Odessa, TX 79760
Gloves, Absorbent socks, and rags	Stored in drums	Offsite Disposal	Univar 311 Lark Ave Odessa, TX 79760

# IX. Proposed Modifications

Currently there are no proposed modifications scheduled.

# X. Inspection and Maintenance

See Attachment 2, Base/District HSE Inspection Report

## XI. Contingency Plan

See Attachment 3, Facility Emergency Response Contingency Plan

## XII. Site Characteristics

Bodies of Water: None

Arroyos: None

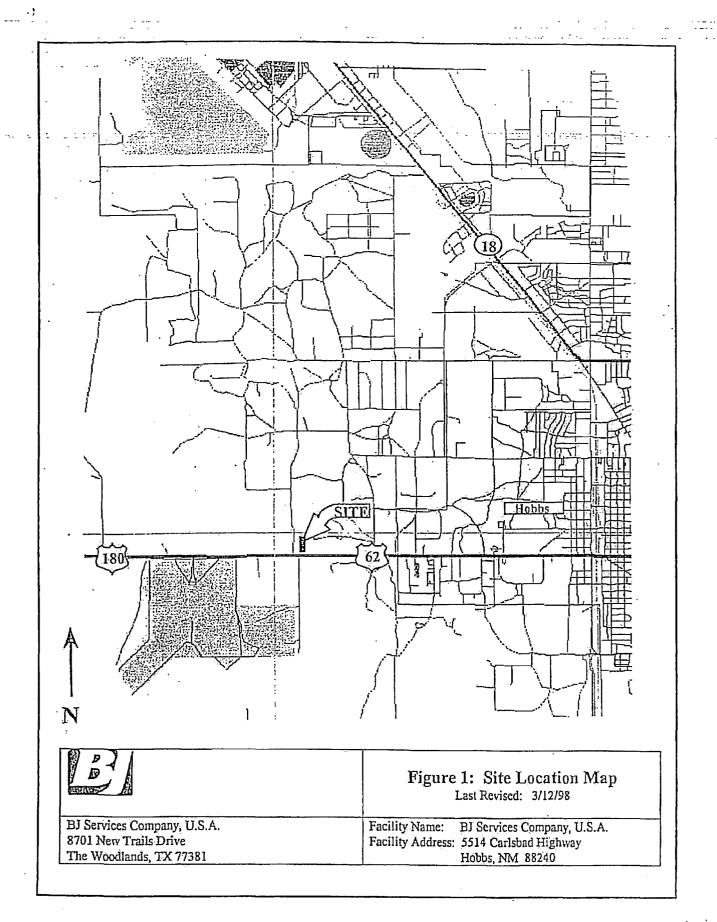
<u>Groundwater Characteristics:</u> Depth to Groundwater (bgs): 20 feet (see Attachment 4 for boring log.). Total Dissolved Solids concentration of approximately 300 mg/L.

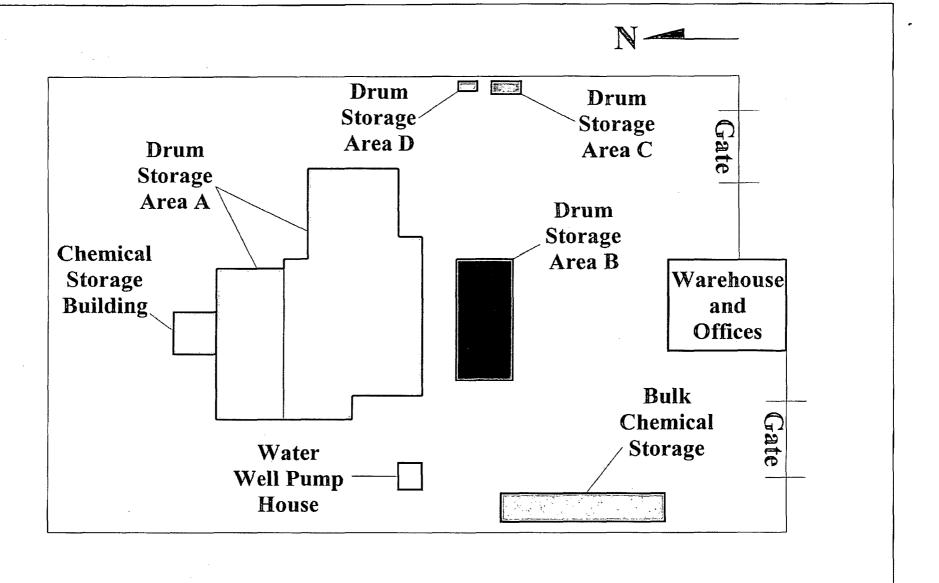
Flooding Potential: None

## XIII. Closure Plans

BJ Services submitted a letter to the OCD on July 11, 1997 outlining the closure activities that had been performed to date and planned closure activities. As a result of some of the items in the letter, BJ Services retained Brown and Caldwell to perform some closure and assessment activities. Brown and Caldwell have submitted two closure plans related to these activities to the OCD. Additional closure plans will be submitted throughout the closure procedure.

# ATTACHMENT 1 SITE PLANS







BJ Services Company, USA 11211 FM 2920 Tomball, Texas 77375 Figure 2: Facility Layout

Hobbs Tools 5514 Carlsbad Highway Hobbs, NM 88240

Not To Scale

REVISION DATE: 10/18/06

DRAWN BY

# ATTACHMENT 2 BASE/DISTRICT HSE INSPECTION REPORT

# US Inspection - 2006 Base/District HSE Inspection Report

BJ Chemical Services Manufacturing - Forklifts
BJ Chemical Services Manufacturing - Vehicles
BJ Chemical Services Manufacturing - Facility Files
BJ Chemical Services Maunfacturing - SCBA

BJ Chemical Services Manufacturing - Locker Room - Washrooms - Break Rooms



Region: BJ Chemical Services District/Base: Support - Hobbs Warehouse - Chemical Services Inspector:	<u>Key</u> N/A - Not Applicable (Default Value) 0 - Needs Immediate Attention
Job Title of Inspector(s):	1 - Needs Attention 2 - Meets Standards
Date of Inspection:	
Product Line: BJ Chemical Services - Manufacturing	Housekeeping Key N/A - Note Applicable (Default Value) 0 - Needs Immediate Attention 1 - Poor 2 - Needs some attention
SUMMARY - AREAS	4 - Good - Meets Standards
HSE Management Standards General Facility Conditions BJ Chemical Services Manufacturing - General Conditions	
BJ Chemical Services Manufacturing - Office	
BJ Chemical Services Manufacturing - Chemical Storage Area BJ Chemical Services Manufacturing - Empty Drum Storage Area	
BJ Chemical Services Manufacturing - Tank Farms	
BJ Chemical Services Manufacturing - Yard/External Equipment Storage Area	
BJ Chemical Services - Chemical Storage Area	
BJ Chemical Services Manufacturing - Waste Management	
BJ Chemical Services Manufacturing - Laboratory BJ Chemical Services Manufacturing - Shop	
DO Chemical Services manufacturing - Shop	

## **QUESTIONS**

Environmental

Significant Facility Changes

1	Managers and Supervisors demonstrate ability to navigate QHSE Standards and other HSE system databases
2	Managers and Supervisors are knowledgable of the QHSE Standards that apply to their area of responsibility (have react the standards)
3	HSE Plan for facility, region, or country in place per standard (QHSE Standard - Health & Safety 3.8)
4	All Trainers are competent (demonstrated by CAP participation, certifications, education, or Training Plan in place)
5	Field personnel oriented per standards prior to field assignment (QHSE Standard - Health & Safety 6.3 plus Region Req'd orientation)
6	Facility APT in place per standard (QHSE Standards - Health & Safety 5.2)
7	HSE Facility and Jobsite Inspections by region/district staff are current for previous quarter
8	Corrective actions from previous inspections (30 days and older) are closed out

- 9 Journey Management guidelines followed (QHSE Standard Health & Safety Section 14.\_)
- 10 Quality of accident reports complete, corrective action taken, and closed out

Gene	eral Facility Conditions
1	Emergency plans for fire, injury or chemical spill (posted, current)
2	Fire extinguishers - (operable, inspected, proper location, proper type)
3	Personal protective equipment (used as required)
4	PPE available for visitors or vendors
5	Trained first aiders at facility (sufficient number, identified, posted )
6	Safety signs and notices (sufficient number, all hazards, current)
7	Safety bulletin board (current)
8	Entryway/gateway (signed, unobstructed )
9	Parking (sufficient, unobstructed, signed)
10	Road surfaces (safe, maintained)
11	Lighting (sufficient, working, assess both internal and external)
12	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
13	Electrical panels and wiring (labeled, secure, maintained)
14	Landscape (presentable, maintained)
15	Safety signs for LTI free days (up to date, visible)
16	Notice to visitors and vendors (where to go, posted)
17	Speed limit signs (posted, visible, adhered to)
18	Security fence (sufficient, maintained)
19	Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)
20	Material safety data sheets (accessible locally, current) Dispatch?
21	Containers (appropriate, stacked, labeled)
22	Pallets (adequate, maintained, safe)
23	Noise levels (signage, measured)
24	Flammable gas (caged, signed, segregated)
НК	Housekeeping ( Rating 0,1,2,4 )

# **BJ Chemical Services**

# Manufacturing - General Conditions

Cond	itions
1	Current mandatory safety legislation posters
2	Local legislative accident log (e.g. OSA 300 or equivalent)
3	Emergency evacuation assembly point (posted, visible, unobstructed)
4	Emergency plans for fire, injury or chemical spill (posted, current)
5	Emergency phone numbers posted (fire, ambulance, police, doctor, chemical spills, injuries)
6	Fire extinguishers (operable, inspected, proper location, proper type)
7	Personal protective equipment (available, provided, and used as required)
8	PPE available for visitors or vendors)
9	First aid kit (adequate number of, adequately stocked, highly visible)
10	Trained first aiders at facility (sufficient number, identified, posted)
11	Safety signs and notices (sufficient number, all hazards, current)
12	Safety bulletin board (current)
13	Entryway/gateway (signed, unobstructed)
14	Parking (sufficient, obstructed, signed)
15	Road surfaces (safe, maintained)
16	Lighting (sufficient, working, assess both internal and external)
17	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
18	Electrical panels and wiring (labeled, secure, maintained)
19	Landscape (presentable, maintained)
20	BJ Services company signs (visible, maintained)
21	Prohibited articles/substances sign (visible, maintained)
22	Safety signs for LTI free days (up to date, visible)
23	Notices to visitors and vendors (where to go, posted)
24	Speed limit signs (posted, visible, adhered to)
25	Security fence (sufficient, maintained)
26	Fixed stairs, ladders, walkways, handrails, gates, and doors (maintained, clear, safe)
27	Emergency exits/routes (signed, unobstructed, site plane of)
28	Hazardous chemicals inventory (held locally, current-6 Month Rule)
29	Material safety data sheets (accessible locally, current) Dispatch?
30	Spills or leaks visible
31	Spill control material (available, appropriate, utilized)
32	Knowledge of environmental and safety (HSE) manuals

33	Knowledge of emergency response plans (fire, injury, spillage)
34	No open containers outside collecting water
HK	Housekeeping ( Rating 0,1,2,4 )

1	Ifacturing - Office  Heating and cooling checked annually	
2	Adequacy and cleanliness of toilet facilities	
3	Floors clean and free of obstructions	 
4	Doorways and passageways free of obstructions	<u></u>
5	Exits clearly marked	

# **BJ Chemical Services** Manufacturing - Chemical Storage Area All chemicals (identified, labeled) 2 Proper stacking (drums and bag pallets-no more than three (3) high) Safety shower and eyewash (maintained, tested) 3 Hoses, piping, and valves (clear, operable, stowed appropriately) 4 Proper chemical segregation (types, aisles, labeled) Used spill material container (available, empty, clean, isolated) Floors (flat, clean, impermeable) 8 Sump (empty, clean, isolated) Racking (capacity signed, inspections) 9 10 Material safety data sheets (accessible locally, current) НК Housekeeping (Rating 0,1,2,4)

BJ Chemical Services Manufacturing - Empty Drum Storage Area

	•
1	Empty drums and pails removed on a routine basis
2	Empty drums stored horizontally with bungs at 3 & 9
3	Empty drums and pails completely empty
4	No leakers
5	Empty drums stored without connections
6	Salvage drum available
7	Empty drums on pallets, cement or asphalt
8	No standing water, sump empty and clean
	hemical Services Ifacturing - Tank Farms
1	All tanks properly labeled (metal sign, NFPA diamond)
2	No visible leaks around tanks or header
3	Catch buckets (empty, properly labeled, and lid on container)
4	No chemical or water in sumps
5	Spill kits available and stocked
6	Bonding cables available, coiled, and in proper working condition
7	Connections properly stored in cabinet
8	Lids, PVVs closed, operable on all tanks
9	No leaking or damaged hoses, valves, or pumps
10	Safety shower/eyewash functioning, inspected, not obstructed, clean
11	Catwalks available and in working order
нк	Housekeeping ( Rating 0,1,2,4 )
Manu	nemical Services Ifacturing - Yard/External
Equip	Pallets (adequate, maintained, safe)
/ <del></del>	Noise levels (signage, measured)
3	Road traffic signage (speed limits posted, warning signage for pedestrians)
4	Segregation of pedestrians/vehicles (walkways marked, railings)
5	PPE (signage, appropriate to risk assessed)

6	Washbay sump(s) clean (routinely maintained and emptied)
7	POTW (inspected, cleaned routinely, randomly sampled)
8	All drums labeled, stacked neatly
9	Inventory controlled (LIFO = taken monthly)

	All chemicals (identified, labeled)	
2	Proper stacking (drums and bag pallets-no more than three (3) high)	•
3	Pallets (adequate, maintained, safe )	
4	Inventory controlled (LIFO - taken monthly )	
5	Hoses, piping, and valves (clear, operable, stowed appropriately)	
6	Proper chemical segregation (types, aisles, labeled)	
7	Used spill material container (available, empty, clean, isolated)	
8	Floors (flat, clean, impermeable)	
g	Material safety data sheets (accessible locally, current)	<del></del> -
10	Waste/surplus chemicals ( routinely identified, correct storage, correct and regular disposal )	

in	agement
1	Waste documents filed properly
2	Waste log sheets attached and properly completed
3	Lab waste properly labeled and handled
4	No chemically contaminated waste in ordinary waste containers
5	Parts cleaner waste being properly handled
6	Waste documents filed properly
7	Weekly inspection of hazardous waste area documented (SQG & LQG only)
8	Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal)
9	Hazardous Waste Satellite accumulation point(s) labeled properly and lid secured

1	Chemical containers identified (BJ Chemical Services policy)
2	Only required chemicals on hand
3	Vent hood installed and operating properly
4	Ground-fault interruption provided for electrical sockets near water
5	Waste containers (labeled, log sheets attached, lids secured, disposed of routinely)
6	MSDSs available
7	Sinks labeled "No Chemical Down Sink~
8	No excessive accumulation of samples
9	Hazardous Waste Satellite accumulation point(s) (labeled and lid secured)

BJ Chemical Services Manufacturing - Shop	
1	Condition of hand tools
2	Grinding equipment and signs
3	Welding and cutting equipment
4	Overhead storage posted for capacity
5	Oily rag container provided and labeled
6	Fixed stairs and railings
7	Paint, lubricants, cleaning agents and solvents properly stored and MSDSs available
8	Confined space permit system
9	Hot work permit system
10	Lockout/Tagout system
11	Ladders
12	Lighting
13	Signs
14	Air Compressors (belts guarded, PRV checked annually)

# **BJ Chemical Services**

Manu	Manufacturing - Forklifts	
1	Forks (condition, maintained, appropriate)	
2	Pre-use daily check sheets (available, utilized)	
3	Area FLT warning signage (visible)	
4	Rated capacity shown on FLT	
5	Backup alarm and/or flashing light (audible, working)	
6	FLT Operators (trained, licensed, nominated)	
7	Controls (operate properly, maintained)	
8	Brakes (operate properly, maintained)	
9	Horn (operates properly, maintained)	
10	Seat condition (maintained, comfortable)	
11	Headlights (sufficient, working)	
12	Rollover protection fitted	

BJ Chemical Services Manufacturing - Vehicles	
1	Documentation (shipping papers, placards, ERG, DOT, & Haz Material Guidebook; log book, trip inspections)
2	Tanks inspection markings
3	Safety items (1st aid kit, 32 oz. eye wash, water, triangle reflectors, fuses, bulbs, shovel)
4	PPE (gloves, goggles, cartridge respirator, tyvek, absorbents)
5	Fire extinguishers (monthly and yearly inspections)
6	Snill kit available

	BJ Chemical Services	
Manufacturing - Facility Files  1 Waste manifests, LDRs, profiles, analyses		
2	EPA ID	
3	Facility inspections	
4	Safety meetings	
5	Waste tracking reports	
6	Annual and Biennial reports (SARA Tier II, SARA TRI, Hazardous Waste)	
7	DOT and hazard communication labels	

8	DOT Drivers qualification files
9	Spill reports
10	Injury/illness and vehicle accident reports
11	H2S monitors calibrations
12	Tank inspection certifications
13	Training records
14	Policies and procedures (HazComm, respiratory protection, LO/TO, ER, Drug Alcohol)

	BJ Chemical Services  Maunfacturing - SCBA	
1	Facepiece - Clean and sealed	
2	Facepiece - Skirt flexible and clean	
3	Facepiece - Headstraps and buckles adjusted out and ok	
4	Facepiece - Exhalation valve	
5	Rubber Hose - Fitting tight, O-rings, crack, cuts	
6	Regulator - Bypass valve closed	
7	Regulator -Main valve locked open	
8	Regulator - regulator knob in DON position	
9	Alarm Bell - Open cylinder valve, close cylinder valve, vent air slowly by opening bypass valve and bleed down to 500 psi on regulator, "bell rings", close bypass valve	
10	Cylinder Valve - Leaks, excessive torque	
11	Cylinder Valve - Leaves in close position	
12	Pressure Gauges - Pressure above 1500 psi, check for cracks	
13	Compressed Air Cylinder - Hydrostatic test date less than 5 years old for steel and 3 years old for composite	
14	Compressed Air Cylinder -Rust, pits, dents and scratches	
15	Back Pack - Broken, twisted or frayed straps	
16	Back Pack - Buckles ok and adjusted out	

BJ Chemical Services	
Manufacturing - Locker Room -	
Washrooms - Break Rooms	
1 Ventilation (adequate)	

2	Showers and sinks (adequate, clean, maintained)
3	Toilets (adequate, clean, maintained)
4	Lockers (sufficient size/number, accessible, lockable)
5	Drinking water (available)
6	Sufficient personal storage and changing space (clean, maintained, adequate)
7	Any required regulations/posters

Product Volume (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not not  Facility Moved (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not not  Number of Employees (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did	and made proper notification, 1 - if changed but did not notify)	Tank Ch
4 Number of Employees (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did	ed and made proper notification, 1 - if changed but did not notify)	Product
	and made proper notification, 1 - if changed but did not notify)	Facility
	changed and made proper notification, 1 - if changed but did not	Number
Biocide Used (N/A - No Change, 2 - if changed and made proper notification, 1 - if changed but did not notification but did not not notification but did not not notification but did not	and made proper notification, 1 - if changed but did not notify)	Biocide

Envir	onmental
1	Environmental recordkeeping systems established
2	Permits & registrations available & current when applicable
3	Waste records maintained (Bill of lading, manifests)
4	Waste disposed of by certified or Company approved vendor
5	Environmental plans current (storm water, spill prevention, emergency response)
6	Proper storage of waste materials (segerated and labeled)
7	Spill control material (available, appropriate, utilized)
8	Surface-water/storm-water drains & discharge points free of oil, debris, etc
9	No open containers outside collecting water
10	Yard free of leaks and spills
11	Trash containers closed - Lids viable
12	Containers present to contain leaking drums, fluids or clean up materials
13	All fuel, oil and diesel tanks in good condition
14	All fuel and oil tanks have adequate containment and free of spills

# Corrective Actions Assigned to: Due Date for Completion: Corrective Action Status: SIGNATURE SECTION If you are the relevant District/Facility Manager, Region/Country/Area Manager, District/ HSE Officer or Other Relevant Manager you should sign the report when you have read it. To add your signature to the appropriate section, click the Edit button (to enter Edit mode), then click on the Review and Sign Off button. This will add your name and the current date to the Accident Report in the relevant section below. Reviewed and Signed Off by the Following: District Safety/Training Supervisor District Manager Region Safety/Training Manager Region Manager

Other Relevant Personnel

Facility / Service Supervisor

# ATTACHMENT 3 SPILL HANDLING AND CONTINGENCY PLAN



# BJ SERVICES COMPANY, U.S.A. HOBBS CHEMICAL SERVICES WAREHOUSE / TOOLS EMERGENCY RESPONSE PLAN

## IN THE CASE OF ANY OIL OR CHEMICAL SPILLS

The Facility Supervisor will immediately notify the District Tools Manager. The District Tools Manager will follow procedures in the US Environmental Standards when reporting spills.

Facility Supervisor

Dean Duarte

505-390-9978 cell

505-393-7791 office

District Tools Mgr.

Jason Taylor

432-381-2301 office

RSTM

David Winkles

432-683-2781 office

## CHEMICAL SPILLS OCCURING OFFSITE OR LARGE ONSITE SPILLS

#### Call CURA National Emergency Response Service at (800) 579-2872

Contact the Environmental Department during work hours at (281) 351-8131 (Main Tomball Number). All agency reporting and reports will be taken care by CURA.

After hours Dispatch Personnel are to obtain the following information from the caller:

Incident Location (address, mile marker, nearest city, etc.)

Person Reporting the Spill (name, title) and phone number

On scene contact (name, title) and phone number

Description of the incident (type and volume of release, substance released, etc.)

Surfaces affected (soil/grass, asphalt, concrete, other)

Water affected (surface, groundwater, coastal)

Sensitive receptors (parks, storm sewer, drainage ditch, residential or populated areas)

Note any initial actions taken to control release.

The Facility Supervisor will call the following people, starting at the top of the list until someone on the list is contacted:

Jo Ann Cobb (281) 357-2572 Office (713) 898-6635 Cellular/Pager (281) 353-4481 Home 
Jake Graf (281) 357-2705 Office (713) 412-7196 Cellular/Pager (281) 516-7669 Home 
Josh Morrissette (281) 357-2573 Office

orrissette (281) 357-2573 Office (713) 705-4875 Cellular/Pager

(281) 419-0723 Home

Tomball Research & Technology Center

Address: 11211 FM 2920, Tomball, TX 77375

Main Number:

(281) 351-8131

QHSE Fax

(281) 357-2585

NATIONAL RESPONSE CENTER (Oil Spills)......

(800) 424-8802

# ATTACHMENT 4 BORING LOG

Project Number: 6240.01

Sheet  $\frac{1}{2}$  of  $\frac{2}{2}$ 

momening won.

Project Name: BJ Services Company U.S.A. (Hobbs, New Mexico) Project Number: 6240.01 Sheet 2 of 2

- T. ec. 77	Depth (feet)	Depth to Water	USC Soil Type	Lithology	Description	PID Readings	Sampled Interval	Recovery (feet)	Sample 1D	Monitoring Well Remarks
]	34 -				Reddish brown sand	15		1		Top of bentonite seal at 35.0 feet.
	38				Reddish Brown sand	18		1	SB-3-40	Top of sand filter pack at 38.0 feet.  Top of screen at 41.0 feet.
	44   1	*			Attempt split spoon sample obtained about 3" sample -Reddish-brown sand 6" recovery	> 244	×	<b>1</b> 0.72	SB-3-45	
	50 - 52 -				Saturated reddish-brown sand	11	X	2		
	54 — 56 — - 58 —				No sample obtained		X	0		56.0
	60 —		-		No sample obtained  Total depth = 60 feet		X	0		58.5 59.0 Bottom of well at 59.0 feet.

1District I 1625 N. French Dr., Hobbs, NM 88240 District II 1301 W. Grand Avenue, Artesia, NM 88210 District III. 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

# State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit Original Plus 1 Copy to Santa Fe 1 Copy to Appropriate District Office

Revised June 10, 2003

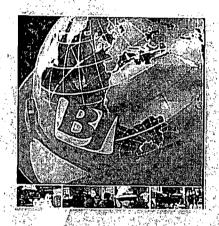
# DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application) New x Renewal Modification OIL FIELD SERVICES Type: BJ SERVICES COMPANY, U.S.A. 2. Operator: 5514 Carlsbad Highway, HOBBS, NM 88240 JOSH MORRISSETTE 281.357.2573 Contact Person: Phone: /4 Section 36\_ \_\_\_Township 18 soutн Submit large scale topographic map showing exact location. Attach the name, telephone number and address of the landowner of the facility site. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. 5. Attach a description of all materials stored or used at the facility. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. Attach a description of proposed modifications to existing collection/treatment/disposal systems. Attach a routine inspection and maintenance plan to ensure permit compliance. Attach a contingency plan for reporting and clean-up of spills or releases. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. 13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. 14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief. Name: JOSH MORRISSETTE Date: 3 - 4 - 2008 Signature:

E-mail Address: joshua.morrissette@bjservices.com



# Hobbs Tools Discharge Plan



BJ Services Company, USA 5514 Carlsbad Hwy. Hobbs, NM 88240

# BJ Services Company, U.S.A. Discharge Plan Hobbs, New Mexico

## March 2008

# I. Type of Operation

BJ Services Company, U.S.A. provides oilfield services, including cementing, acidizing, and fracturing services at oil and gas well sites.

# II. Operator

BJ Services Company, U.S.A. (ServicesTools) 5514 Carlsbad Hwy Hobbs, NM 88240 Contact: Blake Cox 432-530-0016

BJ Services Company, U.S.A. (Chemical Services) 707 N. Leech Hobbs, NM 88240 Contact: Jeff Day 505-393-7751

#### III. Location

See attachment 1, Figure 1 – Site Location Map

## IV. Landowner of Facility Site

BJ Services Company, U.S.A. 11211 FM 2920 Tomball, TX 77375 Contact: Jo Ann Cobb, R.E.M. 281-357-2572

# V. Facility Description

See attachment 1, Figure 2 – Facility Layout

# VI. Materials Stored or Used at the Facility

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
Degreaser	various	Liquid	Drum	55 - gal	Shop
Spray Paint	various	Liquid	Cans	5 - gal	Shop
AL-133	Biocide	Liquid	Storage Tank	80 - gal	Bulk Chemical Storage
AL-160	Biocide	Liquid	Storage Tank	220 - gal	Bulk Chemical Storage
KTL-22W	Water Based Scale Inhibitor	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
RPD-02211	Aromatic/Aliphatic Paraffin Solvent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TC-410	Water Based Cleaning Agent	Liquid	Storage Tank	220 - gal	Bulk Chemical Storage
TCX-3125	Aromatic/Aliphatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TCX-3740	Alcohol Based Corrosion Inhibitor	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
TH-302	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-3036	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-3113	Aromatic Corrosion Inhibitor	Liquid-	Storage Tank	400 - gal	Bulk Chemical Storage
TH-315	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TH-324	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TH-369W	Water/Alcohol Based Corrosion Inhibitor	Liquid	Storage Tanks	1,500 - gal	Bulk Chemical Storage
TH-5324	Aromatic Corrosion Inhibitor	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TS-161	Aromatic/Aliphatic Paraffin Solvent	Liquid	Storage Tank	400 - gal	Bulk Chemical Storage
TS-164	Aromatic Paraffin Solvent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TW-4273	Water Based Cleaning Agent	Liquid	Storage Tank	80 - gal	Bulk Chemical Storage
TW-447	Water Based Cleaning Agent	Liquid	Storage Tank	750 - gal	Bulk Chemical Storage
TW-467	Water Based Cleaning Agent	Liquid	Storage Tank	180 - gal	Bulk Chemical Storage
AL-133	Biocide	Liquid	5 - gal pail	20 -gal	Chemical Storage Building
AL-160	Biocide	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
METHAN OL	Methanol	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
RPD-03085	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TB-100	Oil Based Demulsifier	Liquid	5 - gal pail	100 - gal	Chemical Storage Building
TB-4314	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-410	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-420	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TC-436	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TCX-3220	Aromatic Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TH-369W	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-370	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-5324	Aromatic Corrosion Inhibitor	Liquid	5 - gal pail	110 - gal	Chemical Storage Building
TH-606	Water/Alcohol Based Corrosion Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TH-756	Water Based Scale Inhibitor	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-161	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-163	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-164	Aromatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-175	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	10 - gal	Chemical Storage Building
TS-270	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TS-2817	Aromatic/Aliphatic Paraffin Solvent	Liquid	5 - gal pail	55 - gal	Chemical Storage Building
TW-4222	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-425	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-4273	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-438	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
TW-447	Water Based Cleaning Agent	Liquid	5 - gal pail	110 - gal	Chemical Storage Building
TW-467	Water Based Cleaning Agent	Liquid	5 - gal pail	30 - gal	Chemical Storage Building
KTL-22W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
Methanol	Methanol	Liquid	Drum	550 - gal	Drum Storage Area A
NH7003	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
RCI-05125	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
	Water Based Scale Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
RPD-02211	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
RPD-03085	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
RPI-03071	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	55 - gal	Drum Storage Area A

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Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TB-100	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ТВ-104	Oil Based Demulsifier	Liquid	Drum	55 -gal	Drum Storage Area A
ГВ-5902	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
TB-5916	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ГВ-5942	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ГВ-5979	Oil Based Demulsifier	Liquid	Drum	330 -gal	Drum Storage Area A
ГВ-5986	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ГВ-832	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ГВ-8811	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ГВ-916	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ГВ-917	Oil Based Demulsifier	Liquid	Drum	330 -gal	Drum Storage Area A
ГВ-9421	Oil Based Demulsifier	Liquid	Drum	55 - gal	Drum Storage Area A
ГВ-9551	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ГВ-9614	Oil Based Demulsifier	Liquid	Drum	55 - gal	Drum Storage Area A
ГВ-974	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ГВ-976	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ГВ-979	Oil Based Demulsifier	Liquid	Drum	220 - gal	Drum Storage Area A
ГВ-986	Oil Based Demulsifier	Liquid	Drum	110 - gal	Drum Storage Area A
ΓC-405	Water Based Scale Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
ГС-410	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area A
ГС-4402	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area A
ГСХ-3220	Aromatic Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
reg	Triethylene Glycol	Liquid	Drum	220 - gal	Drum Storage Area A
ΓH-302	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
TH-315	Aromatic Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
TH-324	Aromatic Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area A
ΓS-159	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
ΓS-161 _	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
ΓS-163	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
ΓS-164	Aromatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
ΓS-175	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	110 - gal	Drum Storage Area A
ΓS-253 _	Water Based Paraffin Dispersant	Liquid	Drum	110 - gal	Drum Storage Area A
ΓS-270	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	550 - gal	Drum Storage Area A
ΓS-2710	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
ΓS-275	Water Based Paraffin Dispersant	Liquid	Drum	220 - gal	Drum Storage Area A

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TS-2817	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	330 -gal	Drum Storage Area A
TS-2917	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	110 - gal	Drum Storage Area A
UI-3141	Water Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area A
WCX-5121	Aromatic/Aliphatic Paraffin Solvent	Liquid	Drum	220 - gal	Drum Storage Area A
AL-125	Biocide	Liquid	Drum	220 - gal	Drum Storage Area B
AL-133	Biocide ·	Liquid	Drum	220 - gal	Drum Storage Area B
AL-137	Biocide	Liquid	Drum	110 - gal	Drum Storage Area B
AL-160	Biocide	Liquid	Drum	220 - gal	Drum Storage Area B
PSI-720	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B
RDF-03266	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
RFO-02238	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
RFO-03311	Water Based Foamer	Liquid	Drum.	220 - gal	Drum Storage Area B
RFO-04142	Water Based Foamer	Liquid	Drum	660 - gal	Drum Storage Area B
RFO-06209	Water Based Foamer	Liquid	Drum	44 - gal	Drum Storage Area B
TC-2420	Water Based Cleaning Agent	Liquid	Drum	110 - gal	Drum Storage Area B
TC-420	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TC-436	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TCX-3700	Water Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TCX-3740	Water Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TF-5550	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
TF-5561	Water Based Foamer	Liquid	Drum	330 -gal	Drum Storage Area B
TF-570	Water Based Foamer	Liquid	Drum	220 - gal	Drum Storage Area B
TF-578	Water Based Foamer	Sticks	Box	1	Drum Storage Area B
TF-579	Water Based Foamer	Sticks	Box	1	Drum Storage Area B
TH-356	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
ТН-366	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-368	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	440 - gal	Drum Storage Area B
TH-370	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-3743	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-377	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-3921	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-5798	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B

Material	General Makeup (includes additives)	Form	Type of Container	Estimated Volume Stored	Location
TH-604	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-606	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-6316	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-6389	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-701	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-704	Water/Alcohol Based Corrosion Inhibitor	Liquid	Drum	220 - gal	Drum Storage Area B
TH-756	Water Based Scale Inhibitor	Liquid	Drum	660 - gal	Drum Storage Area B
TH-758W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-760	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-765	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-767	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-781	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-790W	Water Based Scale Inhibitor	Liquid	Drum	110 - gal	Drum Storage Area B
TH-793	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TH-794	Water Based Scale Inhibitor	Liquid	Drum	330 -gal	Drum Storage Area B
TH-798	Water Based Scale Inhibitor	Liquid	Drum	550 - gal	Drum Storage Area B
TW-401	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-425	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-430	Water Based Cleaning Agent	Liquid	Drum	550 - gal	Drum Storage Area B
TW-438	Water Based Cleaning Agent	Liquid	Drum	110 - gal	Drum Storage Area B
TW-447	Water Based Cleaning Agent	Liquid	Drum	1,100 - gal	Drum Storage Area B
TW-4471	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
TW-467	Water Based Cleaning Agent	Liquid	Drum	220 - gal	Drum Storage Area B
Uniklor B	Bleach	Liquid	Drums	165 - gal	Drum Storage Area C
Uniklor C	Sodium Chlorite	Liquid	Drums	220 - gal	Drum Storage Area C
Uniklor A	Hydrochloric Acid	Liquid	Drums	110 - gal	Drum Storage Area D

#### VII. Sources of Effluent and Waste Solids

Waste Type	Source and Composition	Volume per Month	Major Additives
Tank Residual from Clean- outs	Storage Tank	100 gallons	Varies by product
Off-Spec Chemical	Storage Tank	100 gallons	Varies by product
Gloves, Absorbent socks, and rags	Operations	50-lbs	Varies by product

#### VIII. Current Liquid and Solid Waste Collection/Treatment/Disposal Procedures

Waste Type	On Site Handling	Disposal	Disposal Facilities
Tank Residual from Clean-	Stored in drums	Offsite	Univar
outs		Disposal	311 Lark Ave
			Odessa, TX 79760
Off-Spec Chemical	Stored in drums	Offsite	Univar
		Disposal	311 Lark Ave
			Odessa, TX 79760
Gloves, Absorbent socks,	Stored in drums	Offsite	Univar
and rags		Disposal	311 Lark Ave
			Odessa, TX 79760

#### IX. Proposed Modifications

Currently there are no proposed modifications scheduled.

#### X. Inspection and Maintenance

See Attachment 2, Base/District HSE Inspection Report

#### XI. Contingency Plan

See Attachment 3, Facility Emergency Response Contingency Plan

#### XII. Site Characteristics

Bodies of Water: None

Arroyos: None

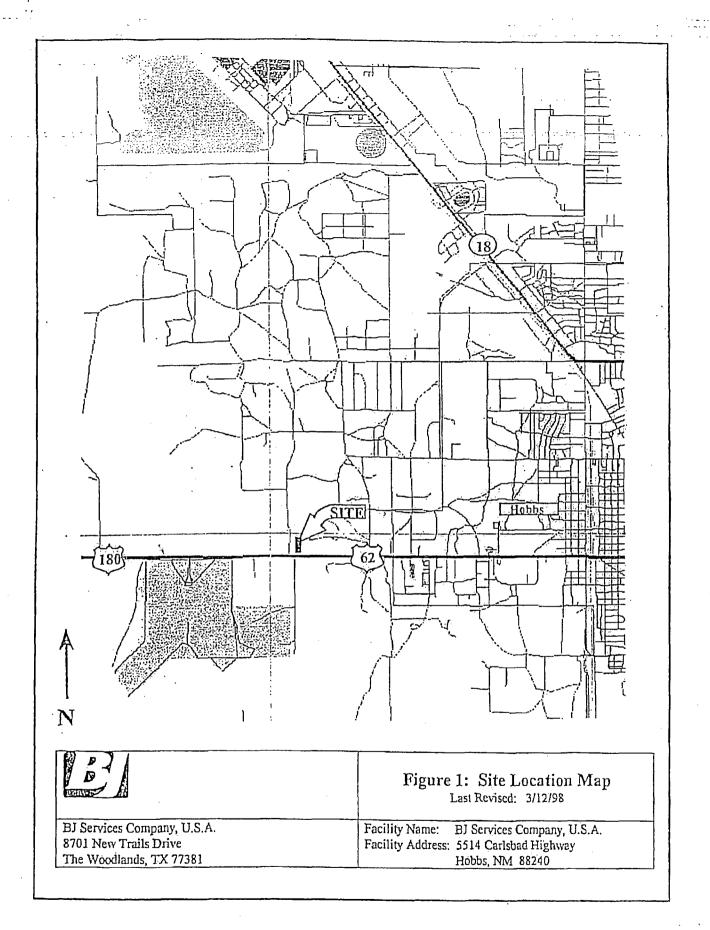
<u>Groundwater Characteristics:</u> Depth to Groundwater (bgs): 20 feet (see Attachment 4 for boring log.). Total Dissolved Solids concentration of approximately 300 mg/L.

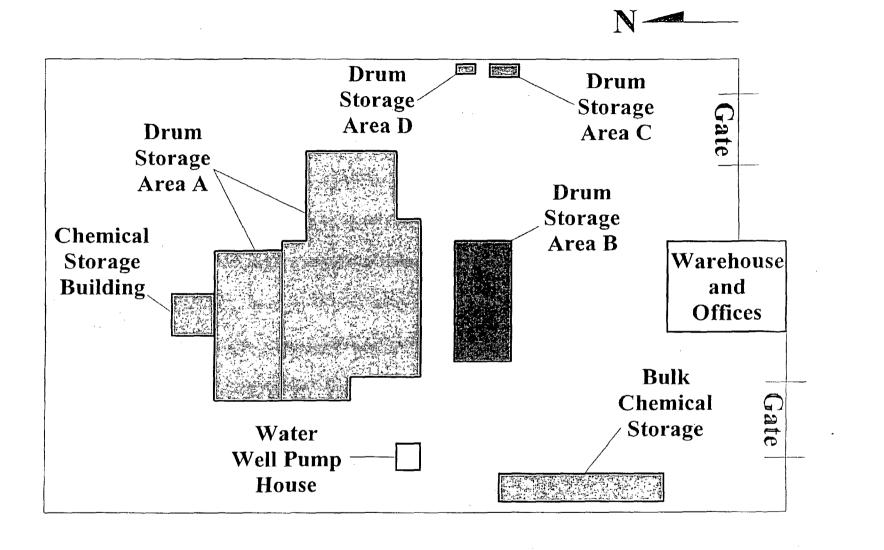
Flooding Potential: None

#### XIII. Closure Plans

BJ Services submitted a letter to the OCD on July 11, 1997 outlining the closure activities that had been performed to date and planned closure activities. As a result of some of the items in the letter, BJ Services retained Brown and Caldwell to perform some closure and assessment activities. Brown and Caldwell have submitted two closure plans related to these activities to the OCD. Additional closure plans will be submitted throughout the closure procedure.

### ATTACHMENT 1 SITE PLANS







BJ Services Company, USA 11211 FM 2920 Tomball, Texas 77375 Figure 2: Facility Layout

Hobbs Tools 5514 Carlsbad Highway Hobbs, NM 88240

Not To Scale

REVISION DATE: 10/18/06

DRAWN BY

### ATTACHMENT 2 BASE/DISTRICT HSE INSPECTION REPORT

#### US Inspection - 2006

#### Base/District HSE Inspection Report



Region: BJ Chemical Services  District/Base: Support - Hobbs Warehouse - Chemical Services Inspector:	<u>Key</u> N/A - Not Applicable (Default Value) 0 - Needs Immediate Attention
Job Title of Inspector(s):	1 - Needs Attention 2 - Meets Standards
Date of Inspection:	
Product Line: BJ Chemical Services - Manufacturing	Housekeeping Key N/A - Note Applicable (Default Value 0 - Needs Immediate Attention 1 - Poor 2 - Needs some attention
IMMARY - AREAS	4 - Good - Meets Standards
SE Management Standards eneral Facility Conditions	

#### SU

HS **BJ Chemical Services Manufacturing - General Conditions** BJ Chemical Services Manufacturing - Office **BJ Chemical Services Manufacturing - Chemical Storage Area** BJ Chemical Services Manufacturing - Empty Drum Storage Area BJ Chemical Services Manufacturing - Tank Farms BJ Chemical Services Manufacturing - Yard/External Equipment Storage Area BJ Chemical Services - Chemical Storage Area **BJ Chemical Services Manufacturing - Waste Management BJ Chemical Services Manufacturing - Laboratory** BJ Chemical Services Manufacturing - Shop **BJ Chemical Services Manufacturing - Forklifts BJ Chemical Services Manufacturing - Vehicles** BJ Chemical Services Manufacturing - Facility Files **BJ Chemical Services Maunfacturing - SCBA** BJ Chemical Services Manufacturing - Locker Room - Washrooms - Break Rooms

#### Environmental QUESTIONS

Significant Facility Changes

1	Managers and Supervisors demonstrate ability to navigate QHSE Standards and other HSE system databases
2	Managers and Supervisors are knowledgable of the QHSE Standards that apply to their area of responsibility (have reactive standards)
3	HSE Plan for facility, region, or country in place per standard (QHSE Standard - Health & Safety 3.8)
4	All Trainers are competent (demonstrated by CAP participation, certifications, education, or Training Plan in place)
5	Field personnel oriented per standards prior to field assignment (QHSE Standard - Health & Safety 6.3 plus Region Reg'd orientation)
6	Facility APT in place per standard (QHSE Standards - Health & Safety 5.2)
7	HSE Facility and Jobsite Inspections by region/district staff are current for previous quarter
8	Corrective actions from previous inspections (30 days and older) are closed out

9	Journey Management guidelines followed (QHSE Standard - Health & Safety Section 14)

10 Quality of accident reports - complete, corrective action taken, and closed out

Gene	eral Facility Conditions
1	Emergency plans for fire, injury or chemical spill (posted, current)
2	Fire extinguishers - (operable, inspected, proper location, proper type)
3	Personal protective equipment (used as required)
4	PPE available for visitors or vendors
5	Trained first aiders at facility (sufficient number, identified, posted )
6	Safety signs and notices (sufficient number, all hazards, current)
7	Safety bulletin board (current)
8	Entryway/gateway (signed, unobstructed )
9	Parking (sufficient, unobstructed, signed)
10	Road surfaces (safe, maintained)
11	Lighting (sufficient, working, assess both internal and external)
12	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
13	Electrical panels and wiring (labeled, secure, maintained)
14	Landscape (presentable, maintained)
15	Safety signs for LTI free days (up to date, visible)
16	Notice to visitors and vendors (where to go, posted)
17	Speed limit signs (posted, visible, adhered to)
18	Security fence (sufficient, maintained)
19	Fixed stairs, ladders, walkways, handrails, gates and doors (maintained, clear, safe)
20	Material safety data sheets (accessible locally, current) Dispatch?
21	Containers (appropriate, stacked, labeled)
22	Pallets (adequate, maintained, safe)
23	Noise levels (signage, measured)
24	Flammable gas (caged, signed, segregated)
НК	Housekeeping ( Rating 0,1,2,4 )

#### **BJ Chemical Services**

### Manufacturing - General Conditions

Cond	itions
1	Current mandatory safety legislation posters
2	Local legislative accident log (e.g. OSA 300 or equivalent)
3	Emergency evacuation assembly point (posted, visible, unobstructed)
4	Emergency plans for fire, injury or chemical spill (posted, current)
5	Emergency phone numbers posted (fire, ambulance, police, doctor, chemical spills, injuries)
6	Fire extinguishers (operable, inspected, proper location, proper type)
7	Personal protective equipment (available, provided, and used as required)
8	PPE available for visitors or vendors)
9	First aid kit (adequate number of, adequately stocked, highly visible)
10	Trained first aiders at facility (sufficient number, identified, posted)
11	Safety signs and notices (sufficient number, all hazards, current)
12	Safety bulletin board (current)
13	Entryway/gateway (signed, unobstructed)
14	Parking (sufficient, obstructed, signed)
15	Road surfaces (safe, maintained)
16	Lighting (sufficient, working, assess both internal and external)
17	Heating and cooling system (radiators free/clear, system checked annually, adequate records)
18	Electrical panels and wiring (labeled, secure, maintained)
19	Landscape (presentable, maintained)
20	BJ Services company signs (visible, maintained)
21	Prohibited articles/substances sign (visible, maintained)
22	Safety signs for LTI free days (up to date, visible)
23	Notices to visitors and vendors (where to go, posted)
24	Speed limit signs (posted, visible, adhered to)
25	Security fence (sufficient, maintained)
26	Fixed stairs, ladders, walkways, handrails, gates, and doors (maintained, clear, safe)
27	Emergency exits/routes (signed, unobstructed, site plane of)
28	Hazardous chemicals inventory (held locally, current-6 Month Rule)
29	Material safety data sheets (accessible locally, current) Dispatch?
30	Spills or leaks visible
31	Spill control material (available, appropriate, utilized)
32	Knowledge of environmental and safety (HSE) manuals

33	Knowledge of emergency response plans (fire, injury, spillage)	ı
34	No open containers outside collecting water	
НК	Housekeeping ( Rating 0,1,2,4 )	

# BJ Chemical Services Manufacturing - Office 1 Heating and cooling checked annually 2 Adequacy and cleanliness of toilet facilities 3 Floors clean and free of obstructions 4 Doorways and passageways free of obstructions 5 Exits clearly marked HK Housekeeping (Rating 0,1,2,4)

#### **BJ Chemical Services** Manufacturing - Chemical Storage Area All chemicals (identified, labeled) 2 Proper stacking (drums and bag pallets-no more than three (3) high) Safety shower and eyewash (maintained, tested) 3 Hoses, piping, and valves (clear, operable, stowed appropriately) Proper chemical segregation (types, alsles, labeled) Used spill material container (available, empty, clean, isolated) Floors (flat, clean, impermeable) 8 Sump (empty, clean, isolated) 9 Racking (capacity signed, inspections) 10 Material safety data sheets (accessible locally, current) Housekeeping (Rating 0,1,2,4) НК

BJ Chemical Services Manufacturing - Empty Drum Storage Area

1	Empty drums and pails removed on a routine basis
2	Empty drums stored horizontally with bungs at 3 & 9
3	Empty drums and pails completely empty
4	No leakers
5	Empty drums stored without connections
6	Salvage drum available
7	Empty drums on pallets, cement or asphalt
8	No standing water, sump empty and clean
	nemical Services
	ıfacturing - Tank Farms
1	All tanks properly labeled (metal sign, NFPA diamond)
2	No visible leaks around tanks or header
3	Catch buckets (empty, properly labeled, and lid on container)
4	No chemical or water in sumps
5	Spill kits available and stocked
6	Bonding cables available, coiled, and in proper working condition
7	Connections properly stored in cabinet
8	Lids, PVVs closed, operable on all tanks
9	No leaking or damaged hoses, valves, or pumps
10	Safety shower/eyéwash functioning, inspected, not obstructed, clean
11	Catwalks available and in working order
нк	Housekeeping ( Rating 0,1.2.4 )
	hemical Services
	rfacturing - Yard/External
Equip	oment Storage Area
1	Pallets (adequate, maintained, safe)
2	Noise levels (signage, measured)
3	Road traffic signage (speed limits posted, warning signage for pedestrians)
4	Segregation of pedestrians/vehicles (walkways marked, railings)
5	PPE (signage, appropriate to risk assessed)

6	Washbay sump(s) clean (routinely maintained and emptied)
7	POTW (inspected, cleaned routinely, randomly sampled)
8	All drums labeled, stacked neatly
9	Inventory controlled (LIFO = taken monthly)

	All chemicals (identified, labeled)
2	Proper stacking (drums and bag pallets-no more than three (3) high)
3	Pallets (adequate, maintained, safe )
4	Inventory controlled (LIFO - taken monthly )
5	Hoses, piping, and valves (clear, operable, stowed appropriately)
6	Proper chemical segregation (types, aisles, labeled)
7	Used spill material container (available, empty, clean, isolated)
8	Floors (flat; clean, impermeable)
9	Material safety data sheets (accessible locally, current)
10	Waste/surplus chemicals ( routinely identified, correct storage, correct and regular disposal )

#### **BJ Chemical Services** Manufacturing - Waste Management Waste documents filed properly 2 Waste log sheets attached and properly completed 3 Lab waste properly labeled and handled 4 No chemically contaminated waste in ordinary waste containers 5 Parts cleaner waste being properly handled Waste documents filed properly Weekly inspection of hazardous waste area documented (SQG & LQG only) 8 Waste/surplus chemicals (routinely identified, correct storage, correct and regular disposal) 9 Hazardous Waste Satellite accumulation point(s) labeled properly and lid secured НК Housekeeping (Rating 0,1,2,4)

	nemical Services
Manu	facturing - Laboratory
1	Chemical containers identified (BJ Chemical Services policy)
2	Only required chemicals on hand
3	Vent hood installed and operating properly
4	Ground-fault interruption provided for electrical sockets near water
5	Waste containers (labeled, log sheets attached, lids secured, disposed of routinely)
6	MSDSs available
7	Sinks labeled "No Chemical Down Sink~
8	No excessive accumulation of samples
9	Hazardous Waste Satellite accumulation point(s) (labeled and lid secured)

BJ CI	nemical Services	
Manufacturing - Shop		
1	Condition of hand tools	
2	Grinding equipment and signs	
3	Welding and cutting equipment	
4	Overhead storage posted for capacity	
5	Oily rag container provided and labeled	
6	Fixed stairs and railings	
7	Paint, lubricants, cleaning agents and solvents properly stored and MSDSs available	
8	Confined space permit system	
9	Hot work permit system	
10	Lockout/Tagout system	
11	Ladders	
12	Lighting	
13	Signs	
14	Air Compressors (belts guarded, PRV checked annually)	

#### **BJ Chemical Services**

Manu	factu	rina -	Forklifts
1410110	IUULU	1111194 -	i Olumii

	nectaing - i Orkints	
1	Forks (condition, maintained, appropriate)	
2	Pre-use daily check sheets (available, utilized)	
3	Area FLT warning signage (visible)	
4	Rated capacity shown on FLT	
5	Backup alarm and/or flashing light (audible, working)	
6	FLT Operators (trained, licensed, nominated)	<del></del>
7	Controls (operate properly, maintained)	
В	Brakes (operate properly, maintained)	
9	Horn (operates properly, maintained)	
10	Seat condition (maintained, comfortable)	
11	Headlights (sufficient, working)	
12	Rollover protection fitted	

#### **BJ Chemical Services**

#### **Manufacturing - Vehicles**

- Documentation (shipping papers, placards, ERG, DOT, & Haz Material Guidebook; log book, trip inspections)
- 2 Tanks inspection markings
- 3 Safety items (1st aid kit, 32 oz. eye wash, water, triangle reflectors, fuses, bulbs, shovel)
- PPE (gloves, goggles, cartridge respirator, tyvek, absorbents)
- 5 Fire extinguishers (monthly and yearly inspections)
- 6 Spill kit available

#### **BJ Chemical Services**

#### Manufacturing - Facility Files

- 1 Waste manifests, LDRs, profiles, analyses
- 2 EPAID
- 3 Facility inspections
- 4 Safety meetings
- 5 Waste tracking reports
- 6 Annual and Biennial reports (SARA Tier II, SARA TRI, Hazardous Waste)
- 7 DOT and hazard communication labels

8	DOT Drivers qualification files
9	Spill reports
10	Injury/illness and vehicle accident reports
11	H2S monitors calibrations
12	Tank inspection certifications
13	Training records
14	Policies and procedures (HazComm, respiratory protection, LO/TO, ER, Drug Alcohol)

	nemical Services facturing - SCBA
1	Facepiece - Clean and sealed
2	Facepiece - Skirt flexible and clean
3	Facepiece - Headstraps and buckles adjusted out and ok
4	Facepiece - Exhalation valve
5	Rubber Hose - Fitting tight, O-rings, crack, cuts
6	Regulator - Bypass valve closed
7	Regulator -Main valve locked open
8	Regulator - regulator knob in DON position
9	Alarm Bell - Open cylinder valve, close cylinder valve, vent air slowly by opening bypass valve and bleed down to 500 psi on regulator, "bell rings", close bypass valve
10	Cylinder Valve - Leaks, excessive torque
11	Cylinder Valve - Leaves in close position
12	Pressure Gauges - Pressure above 1500 psi, check for cracks
13	Compressed Air Cylinder - Hydrostatic test date less than 5 years old for steel and 3 years old for composite
14	Compressed Air Cylinder -Rust, pits, dents and scratches
15	Back Pack - Broken, twisted or frayed straps
16	Back Pack - Buckles ok and adjusted out

BJ Chemical Services		
Manufacturing - Locker Room -		
Washrooms - Break Rooms	i e	
1 Ventilation (adequate)		

2	Showers and sinks (adequate, clean, maintained)		
3	Toilets (adequate, clean, maintained)		
4	Lockers (sufficient size/number, accessible, lockable)		
5	Drinking water (available)		
6	Sufficient personal storage and changing space (clean, maintained, adequate)		
7	Any required regulations/posters		

1	Tank Change (N/A - No Change, 2 - if changed and made proper notification, 1 - if changed but did not notify)
2	Product Volume (N/A - No Change, 2 - if changed and made proper notification, 1 - if changed but did not notify)
3	Facility Moved (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not notify)
4	Number of Employees (N/A - No Change , 2 - if changed and made proper notification, 1 - if-changed but did not notify
5	Biocide Used (N/A - No Change , 2 - if changed and made proper notification, 1 - if changed but did not no

Additional Information Required
Please contact Bill Steiner if any of the above have significantly changed.
If the facility has moved, please type in the date it was moved:

Environmental		
1	Environmental recordkeeping systems established	
2	Permits & registrations available & current when applicable	
3	Waste records maintained (Bill of lading, manifests)	
4	Waste disposed of by certified or Company approved vendor	
5	Environmental plans current (storm water, spill prevention, emergency response)	
6	Proper storage of waste mateials (segerated and labeled)	
7	Spill control material (available, appropriate, utilized)	
<u> </u>	Surface-water/storm-water drains & discharge points free of oil, debris, etc	
9	No open containers outside collecting water	
10	Yard free of leaks and spills	
11	Trash containers closed - Lids viable	
12	Containers present to contain leaking drums, fluids or clean up materials	
13	All fuel, oil and diesel tanks in good condition	
14	All fuel and oil tanks have adequate containment and free of spills	

#### CORRECTIVE ACTION RESPONSIBILITY

Corrective Actions Assigned to:	Due Date for Completion:
Corrective Action Status:	
Relevant Manager you should sign the reposection, click the Edit button (to enter Edit	ager, Region/Country/Area Manager, District/ HSE Officer or Other or when you have read it. To add your signature to the appropriate mode), then click on the Review and Sign Off button. This will Accident Report in the relevant section below.
District Safety/Training Supervisor	District Manager
Region Safety/Training Manager	Region Manager
Facility / Service Supervisor	Other Relevant Personnel

### ATTACHMENT 3 SPILL HANDLING AND CONTINGENCY PLAN



### BJ SERVICES COMPANY, U.S.A. HOBBS CHEMICAL SERVICES WAREHOUSE / TOOLS EMERGENCY RESPONSE PLAN

#### IN THE CASE OF ANY OIL OR CHEMICAL SPILLS

The Facility Supervisor will immediately notify the District Tools Manager. The District Tools Manager will follow procedures in the US Environmental Standards when reporting spills.

Facility Supervisor

Dean Duarte

505-390-9978 cell

505-393-7791 office

District Tools Mgr.

Jason Taylor

432-381-2301 office

RSTM

David Winkles

432-683-2781 office

#### CHEMICAL SPILLS OCCURING OFFSITE OR LARGE ONSITE SPILLS

#### Call CURA National Emergency Response Service at (800) 579-2872

Contact the Environmental Department during work hours at (281) 351-8131 (Main Tomball Number). All agency reporting and reports will be taken care by CURA.

After hours Dispatch Personnel are to obtain the following information from the caller:

Incident Location (address, mile marker, nearest city, etc.)

Person Reporting the Spill (name, title) and phone number

On scene contact (name, title) and phone number

Description of the incident (type and volume of release, substance released, etc.)

Surfaces affected (soil/grass, asphalt, concrete, other)

Water affected (surface, groundwater, coastal)

Sensitive receptors (parks, storm sewer, drainage ditch, residential or populated areas)

Note any initial actions taken to control release.

The Facility Supervisor will call the following people, starting at the top of the list until someone on the list is contacted:

Jo Ann Cobb	(281) 357-2572	Office
	(713) 898-6635	Cellular/Pager
	(281) 353-4481	Home
Jake Graf	(281) 357-2705	Office
	(713) 412-7196	Cellular/Pager
	(281) 516-7669	Home
Josh Morrissette	(281) 357-2573	Office
•	(713) 705-4875	Cellular/Pager

(281) 419-0723 Home

Tomball Research & Technology Center

Address: 11211 FM 2920, Tomball, TX 77375

Main Number:

(281) 351-8131

QHSE Fax

(281) 357-2585

#### NATIONAL RESPONSE CENTER (Oil Spills)......

(800) 424-8802

### ATTACHMENT 4 BORING LOG

momorning won.

Project Name: B.I Services Company U.S.A. (Hobbs, New Mexico) Project Number: 6240.01 Sheer \_\_\_\_ Readings Sampled Interval Recovery (feet) Depth to Water USC Soil Type Monitoring Well Depth (feet) Description Sample 1D Remarks ΔI 34 -Reddish brown sand Top of bentonite seal at 35.0 feet. 36 -38.0 38 -Top of sand filter pack at 38.0 feet. 40 Reddish Brown sand SB-3-40 41.0 Top of screen at 41.0 feet. 42 -Attempt split spoon sample obtained about 3" sample 244 20.75 SB-3-45 -Reddish-brown sand 6" recovery 46-48 50-Saturated reddish-brown sand 11 52 No sample obtained 56.0 56 Bottom of screen at 56.0 feet. 58 58.5 59.0\_ No sample obtained Bottom of well at 59.0 feet. 60 – Total depth = 60 feet



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

July 13, 2000

Lori Wrotenbery
Director
Oil Conservation Division

### CERTIFIED MAIL RETURN RECEIPT NO. 5051 5581

Mr. Rick N. Johnson BJ Services Company 11211 FM 2920 Tomball, Texas 77375

Re:

Discharge Plan GW-017 Renewal

Old Nowsco (Acid Engineering) Facility

Lea County, New Mexico

Dear Mr. Rick N. Johnson:

The groundwater discharge plan renewal for the BJ Services Company Old Nowsco (Acid Engineering) Facility operated by BJ Services Company located in the SE/4 SW/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within ten working days of receipt of this letter.

The original discharge plan was issued by the New Mexico Environment Improvement Division (EID) on Jan 06, 1983, transferred to the OCD April 18, 1988, subsequently renewed on December 13, 1993, modified on March 21, 1996 with an expiration date of April 18, 1998. The discharge plan renewal application dated April 02, 1998 including attachments, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve BJ Services Company of liability should operations result in pollution of surface or ground waters, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., BJ Services Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. This approval will expire April 18, 2003 and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the BJ Services Company, Old Nowsco (Acid Engineering) Facility is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus a renewal flat fee of \$690.00 for an Oil Field Service Company. The OCD has received the filing and flat fee.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

RCA/lwp Attachment-1

xc: OCD Hobbs Office

# ATTACHMENT TO THE DISCHARGE PLAN GW-017 APPROVAL BJ Services Company, Old Nowsco (Acid Engineering) Facility DISCHARGE PLAN APPROVAL CONDITIONS July 13, 2000

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee and the \$690.00 flat fee has been paid.
- 2. <u>Commitments</u>: BJ Services Company will abide by all commitments submitted in the discharge plan renewal application dated April 02, 1998, and these conditions for approval.
- 3. <u>Drum Storage:</u> 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 place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
- 4. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 5. <u>Above Ground Tanks:</u> 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.
- 6. <u>Above Ground Saddle Tanks</u>: 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.
- 7. <u>Labeling:</u> All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
- 8. Below Grade Tanks/Sumps: All active below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than August 15, 2000 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD in an annual report due on August 15, of each year.
- 9. <u>Underground Process/Wastewater Lines:</u> All active underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than August 15, 2000 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours

prior to all testing. The test results will be submitted to OCD in the annual report due on August 15, 2000.

- 10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.
- 12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WOCC 1203. to the OCD Hobbs District Office.
- 13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 14. Storm Water Plan: BJ Services Company will submit a storm water run-off plan for OCD approval by August 15, 2000. This plan is not required unless BJ Services Company resumes operations at this site or if any on-site contamination has potential to cause water pollution of any fresh water.
- 15. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 16. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Vadose Zone and Water Pollution:</u> The previously submitted investigation and remediation plans were submitted pursuant to the discharge plan and all future discoveries of contamination will be addressed through the discharge plan process.

18. <u>Certification:</u> **BJ Services Company** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **BJ Services Company** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: BJ Services Company

Company Representative- print n	ame
	Date
Company Representative- Sign	
Title	*

#### DRAFT

February 04, 2004

### CERTIFIED MAIL RETURN RECEIPT NO.

Ms. Jo Ann Cobb BJ Services Company 11211 FM 2920 Tomball, Texas 77375

Re:

Discharge Permit GW-017 Renewal

Old Nowsco (Acid Engineering) Facility

Lea County, New Mexico

Dear Ms. Cobb:

The groundwater discharge permit renewal for the BJ Services Company Old Nowsco (Acid Engineering) Facility operated by BJ Services Company located in the SE/4 SW/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.

The original discharge permit was issued by the New Mexico Environment Improvement Division (EID) on Jan 06, 1983, transferred to the OCD April 18, 1988, subsequently renewed on December 13, 1993, modified on March 21, 1996 with an expiration date of April 18, 1998. The discharge permit renewal application dated December 18, 2003 including attachments, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge permit is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the permit. Please be advised that approval of this permit does not relieve BJ Services of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve BJ Services of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Ms. Jo Ann Cobb February 04, 2004 Page 2

Please note that Section 3104. of the regulations requires that "when a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to Section 3107.C., BJ Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval** will expire April 18, 2008 and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.

The discharge permit application for the BJ Service's Hobbs service yard (Carlsbad Hwy) is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge permit will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee of \$1700.00 for oilfield service facilities. The OCD has not received the \$100.00 filing or \$1700.00 flat fee. The flat fee may be paid in a single payment due on the date of the discharge permit approval or in five equal installments over the expected duration of the discharge permit. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge permit approval and subsequent installments due on this date of each calendar year.

Please make all checks payable to: Water Quality Management Fund

C/o: Oil Conservation Division

1220 South Saint Francis Drive

Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail WPRICE@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Roger C. Anderson Environmental Bureau Chief RCA/lwp Attachment-1 Xc: OCD Hobbs Office

# ATTACHMENT TO THE DISCHARGE PERMIT GW-17 APPROVAL BJ Services Hobbs Yard (Carlsbad Hwy) DISCHARGE PERMIT APPROVAL CONDITIONS February 04, 2004

- 1. Payment of Discharge Permit Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee of \$1700.00 for oilfield service company facilities. The flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
- 2. <u>Commitments</u>: BJ Services will abide by all commitments submitted in the discharge permit renewal application dated December 18, 2003 including attachments and these conditions for approval.
- 3. <u>Drum Storage</u>: 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 place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
- 4. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 5. 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.
- 6. 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.
- 7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

- 8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks, sumps and pits must be tested annually, except systems that have secondary containment with leak detection. These systems with leak detection shall have a monthly inspection of the leak detection to determine if the primary containment is leaking. Results of tests and inspections shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Any system found to be leaking shall be reported pursuant to Item # 12. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 9. <u>Underground Process/Wastewater Lines</u>: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspections will be retained on site for a period of five years.

- 12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD District Office.
- 13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712 disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge permit, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

- 14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
- 15. Storm Water Permit: Stormwater runoff controls shall be maintained. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off, then immediate actions shall be taken to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge permit to include a formal stormwater run-off containment permit and submit for OCD approval within 15 days.
- 16. <u>Transfer of Discharge Permit</u>: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
- 17. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 18. <u>Vadose Zone and Water Pollution</u>: The previously submitted investigation and remediation plans were submitted pursuant to the discharge permit and all future discoveries of contamination will be addressed through the discharge permit process.

19. Certification: **BJ Services** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **BJ Services** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: BJ Services

Company Representative- print name	
	Date
Company Representative- Sign	



### NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

JUL 27 100 1

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

July 13, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 5581

Mr. Rick N. Johnson BJ Services Company 11211 FM 2920 Tomball, Texas 77375

Re:

Discharge Plan GW-017 Renewal

Old Nowsco (Acid Engineering) Facility

Lea County, New Mexico

Dear Mr. Rick N. Johnson:

The groundwater discharge plan renewal for the BJ Services Company Old Nowsco (Acid Engineering) Facility operated by BJ Services Company located in the SE/4 SW/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within ten working days of receipt of this letter.

The original discharge plan was issued by the New Mexico Environment Improvement Division (EID) on Jan 06, 1983, transferred to the OCD April 18, 1988, subsequently renewed on December 13, 1993, modified on March 21, 1996 with an expiration date of April 18, 1998. The discharge plan renewal application dated April 02, 1998 including attachments, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve BJ Services Company of liability should operations result in pollution of surface or ground waters, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., BJ Services Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. Rick N. Johnson 07/13/00 Page 2

Pursuant to Section 3109.H.4., this approval is for a period of five years. This approval will expire April 18, 2003 and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the BJ Services Company, Old Nowsco (Acid Engineering) Facility is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus a renewal flat fee of \$690.00 for an Oil Field Service Company. The OCD has received the filing and flat fee.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

RCA/lwp Attachment-1

xc: OCD Hobbs Office

# ATTACHMENT TO THE DISCHARGE PLAN GW-017 APPROVAL BJ Services Company, Old Nowsco (Acid Engineering) Facility DISCHARGE PLAN APPROVAL CONDITIONS July 13, 2000

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee and the \$690.00 flat fee has been paid.
- 2. <u>Commitments:</u> BJ Services Company will abide by all commitments submitted in the discharge plan renewal application dated April 02, 1998, and these conditions for approval.
- 3. <u>Drum Storage:</u> 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 place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
- 4. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 5. <u>Above Ground Tanks:</u> 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.
- 6. <u>Above Ground Saddle Tanks:</u> 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.
- 7. <u>Labeling:</u> All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
- 8. Below Grade Tanks/Sumps: All active below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than August 15, 2000 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD in an annual report due on August 15, of each year.
- 9. <u>Underground Process/Wastewater Lines:</u> All active underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than August 15, 2000 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours

Mr. Rick N. Johnson 07/13/00 Page 4

prior to all testing. The test results will be submitted to OCD in the annual report due on August 15, 2000.

- 10. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. <u>Housekeeping:</u> All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.
- 12. <u>Spill Reporting:</u> All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Hobbs District Office.
- 13. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 14. <u>Storm Water Plan:</u> BJ Services Company will submit a storm water run-off plan for OCD approval by August 15, 2000. This plan is not required unless BJ Services Company resumes operations at this site or if any on-site contamination has potential to cause water pollution of any fresh water.
- 15. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 16. <u>Closure:</u> The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Vadose Zone and Water Pollution:</u> The previously submitted investigation and remediation plans were submitted pursuant to the discharge plan and all future discoveries of contamination will be addressed through the discharge plan process.

18. <u>Certification:</u> **BJ Services Company** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **BJ Services Company** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: BJ Services Company

Company Representative print name

\_Date\_<u>7-24</u>-00

company Representative- Sign

Title SR. GUVRNIMENTAL SPECIALIST

#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of chec	ck No. dated $3/17/9$ %,
or cash received on	in the amount of \$
from 35 Services	
for Hables lacid Em	GW-17:
(Facility Hamps	
Submitted by: Rand	Date: 4/18/98
Received in ASD by:	Date:
Filing Fee X New Facility	Reneval
Modification Other	
Organization Code <u>521.07</u>	Applicable FY 98
To be deposited in the Water Quali	ty Management Fund.
Full Payment or Annual	Increment

	L	3	
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#### BJ SERVICES COMPANY

P.O. BOX 4442 HOUSTON, TX 77210 713/462-4239

The Chase Manhattan Bank, N.A.. Syracuse, New York

**VENDOR NO.** 153892

CHECK NO.

CHECK DATE

CHECK AMOUNT

03/17/98

\*\*\*\*\*\*740.00

<u>50-037</u> 213

PAY SEVEN HUNDRED FORTY AND 00/100 \*\*\*\*\*\*\*\*

STATE OF NEW MEXICO OIL CONSERVATION DIVISION 2040 SOUTH PACHECO STATE LAND OFFICE BLDG SANTA FE, NM 87505

VOID AFTER 90 DAYS
AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.

#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASE

I hereby acknowledge receipt of check No dated 3/25/96
or cash received on in the amount of \$ 50.00
from Ward Hawkins
for Daws co Will Suc Hobbs Faully (34) -017
Submitted by: Date:
Submitted to ASD by: E Charles Date: 3/27/95
Received in ASD by: Chaela Herrera Date: 3-29-95
Filing Fee X New Facility Renewal
Modification Other
Organization Code 521.07 Applicable FY 96
To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment
DWSCO WARD S. HAWKINS 1-96 NELL SERVICE PETTY CASH 505-393-1377 5514 CARLSBAD HWY. HOBBS, NM 88240-1778 3-25 19 96
ORDER OF NMED-WATER QUALITY MANAGEMENT \$ 50.92  GPTY & NO/100 DOLLARS
SUMWEST BANK OF HOBBS, NA. HOBBS, NEW MEXICO BEPA1 (505) 393-5460  MEMO FILLNER FFF.  SUMMA ) TAZZA WALV

Mr. Ward Hawkins March 21, 1996 Page 3



# ATTACHMENT TO THE DISCHARGE PLAN GW-17 MODIFICATION APPROVAL NOWSCO WELL SERVICE, INC. HOBBS FACILITY DISCHARGE PLAN MODIFICATION REQUIREMENTS (March 21, 1996)

- 1. Payment of Discharge Plan Fees: The \$50 filing fee shall be submitted upon receipt of this approval.
- 2. <u>NOWSCO Commitments:</u> NOWSCO will abide by all commitments submitted in the modification application letter dated February 27, 1996 from NOWSCO as well as the discharge plan approval dated December 13, 1993.
- 3. <u>Waste Water Testing:</u> Prior to disposal at an OCD approved site, all waste water will be tested for hazardous constituents.
- 4. <u>Housekeeping</u>: All systems designed for spill collection/prevention should be inspected frequently to ensure proper operation and to prevent overtopping or system failure.
- 5. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the appropriate OCD District Office.

6. Conditions accepted by:

Company Representative

م ر Date

BASE MANAGER

Title

March 21, 1996

### CERTIFIED MAIL RETURN RECEIPT NO. Z-765-962-935

Mr. Ward Hawkins NOWSCO Well Service, Inc. 5514 Carlsbad Hwy Hobbs, New Mexico 88240

6W-17 pub 1V-31-96

RE: Discharge Plan GW-17 Modification

**Hobbs Facility** 

Lea County, New Mexico

Dear Mr. Hawkins:

The discharge plan modification GW-17, for the NOWSCO Well Service, Inc. Hobbs Facility located in the SW/4 SW/4 of Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan modification consists of the request dated February 27, 1996 to upgrade the subgrade waste water and product collection system by elevating the existing concrete divider and applying an external coating. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within five working days of receipt of this letter.

The discharge plan modification was submitted pursuant to Section 3107.C of the New Mexico Water Quality Control Commission (WQCC) Regulations. Based on the information provided in the modification request and in the approved discharge plan, it is approved pursuant to Section 3109. Please be advised the approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment.

Please note that Section 3104 of the regulations require "When a facility has been approved,

#### Well Service Inc.

P.O. BOX 753 KILGORE, TEXAS 75663 TELEPHONE (903) 983-2086 FACSIMILE (903) 984-4536

<sup>7</sup>94 FE<sup>A</sup> 15 AM 8 35



February 8, 1994

State of New Mexico
Energy, Minerals and Natural Resc. Dept.
Attn: Mr. William J. LeMay
P. O. Box 2088
Santa Fe, NM 87504

RE:

Discharge Plan GW-17 Approval

Hobbs Service Facility Lea County, New Mexico RECEIVED

MAR 1 5 1994

OIL CONSERVATION DIV. SANTA FE

Dear Mr. LeMay:

In regard to your letter dated December 13, 1994 concerning the above reference, please note the following.

Enclosed is Acid Engineering, Inc. Check #37975 for \$740.00. This check is for a filing fee of \$50.00 and a single payment of \$690.00 for the flat fee for an approved discharge plan.

Also, please be advised that effective November 1, 1993, Acid Engineering, Inc. was sold to Nowsco Well Service, Inc. All operations and personnel will remain the same. If there is any further information needed to amend this to reflect the Nowsco name, please let us know.

Sincerely,

Ronnie Harpe Safety Director

RH/smw encl

## ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check	No. dated 3/9/94,
or cash received on $3/21/94$ ir	the amount of \$ 69000
from Acid Engineering, Inc	
for Hobbs Service Facility	GW-17
Submitted by:	(OP No.)  Date:
Submitted to ASD by: Kather From	
Received in ASD by: //////	Date: 3/21/94
Filing Fee New Facility	Renewal
ModificationOther	
Organization Code 501.07	applicable FY 94
To be deposited in the Water Quality	•
CHECK NO.   CHECK DATE:   VENDOR NO.   3-9-94	CHECK NO.  CITIZENS BANK KILGORE, TEXAS
P.O. BOX 753 • KILGORE, TEXAS 75663	
***SIX HUNDRED NINETY DOLLARS AND 00/100*********	\$**690.00**
AY O THE NMED-WATER QUALITY MANAGEMENT ORDER OF P C BOX 2088	ACID ENGINEERING, INC. ACCOUNT I

SANTA FE, NM 87504

#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 3-19-04
or cash received on 4-79-04
or cash received on 4-29-04 in the amount of \$ \$ 1800.00
for BJ Services Company 6W-017
Martyne Kieling
Submitted to ASD by: Mark 1/29-09
Submitted to ASD by: Martyne Kieling Date: 4-29-04  Received in ASD by:  Date: 4-29-04
Filing Fee New Facility Renewal
Modification Other
Organization Code 521.07 Applicable FY 2001
To be deposited in the Water Quality Management .
Full Payment or Annual Increment

13.75	
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	1975
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	* 49
	-

#### **BJ SERVICES COMPANY**

BJ Services Company U.S.A. P.O. BOX 4442 HOUSTON, TX 77210 713/462-4239

The Chase Manhattan Bank, N.A. Syracuse, New York

VENDOR NO. 157889

CHECK NO.

CHECK DATE

CHECK AMOUNT

<u>50-9</u>37 213

03/19/04 \*\*\*\*\*1,800.00

PAY ONE THOUSAND EIGHT HUNDRED AND 00/100

> NEW MEXICO ENVIRONMENTAL DEPT WATER QUALITY MANAGEMENT FUND 1220 SOUTH ST FRANCIS DR SANTA FE NM 87505

**VOID AFTER 90 DAYS** AS AN AUTHORIZED SIGNER OF BJ SERVICES COMPANY, U.S.A.

## ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

	I hereby acknowledge receipt of chec	k No. dated 11/30/93	,
	or cash received on 12/6/93	in the amount of \$ 50.00	
	from Acid Engineering, Inc.		
	for Hobbs Service Facility	GW-17	_
	Submitted by:	(DP Na.)  Date:	_
	Submitted to ASD by: Xathe Brown	Date: 12/6/93	•
	Received in ASD by:	in Date: 12-6-93	
	Filing Fee X New Facility	Renewal	•
	Modification Other		
	Organization Code 521.07	Applicable FY 924	
	To be deposited in the Water Qualit	y Management Fund.	
	Full Payment or Annual		
CHECK NO.	CHECK DATE VENDOR NO.	CHECK NO.	
	11-30-93	CITIZENS BANK KILGORE, TEXAS	
	ENGINEERING P.O. BOX 753 • KILGORE, TEXAS 750	6663	
	***FIFTY DOLLARS AND 00/100******	\$**50.00***	
PAY		ACID ENGINEERING, INC. ACCOUNT I	_
TO THE ORDER OF	NMED - WATER QUALITY MANAGEMENT P 0 Box 2088 Santa Fe NM 87504	Jan Recomm	
		AUTHORIZED SIGNATURE	_

#### STATE OF NEW MEXICO



#### ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

December 13, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-138

Mr. Lloyd Bolding Acid Engineering, Inc. 5514 Carlsbad Highway Hobbs, New Mexico 88240

RE: DISCHARGE PLAN GW-17 APPROVAL

ACID ENGINEERING, INC. HOBBS SERVICE FACILITY

LEA COUNTY, NEW MEXICO

Dear Mr. Bolding:

The discharge plan renewal GW-17 for Acid Engineering, Inc. Hobbs Service Facility located in the SW/4, SW/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated June 16, 1993, and the materials dated November 30, 1993 submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations (WQCC). It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Mr. Lloyd Bolding December 13, 1993 Page 2

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan approval is for a period of five (5) years. The discharge plan GW-17 expired on April 18, 1993, and this approval is for five years from that date. This approval will expire April 18, 1998, and you should submit an application for renewal in ample time before this date.

The discharge plan renewal application for the Acid Engineering, Inc. Hobbs Service Facility is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six hundred and ninety (690) dollars for service companies.

The OCD has received your \$50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.

Please make all checks out to: NMED - Water Quality Management and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay

Director

WJL/kmb

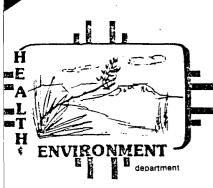
Attachment

xc: Jerry Sexton, OCD Hobbs Office

# ATTACHMENT TO DISCHARGE PLAN GW-17 APPROVAL ACID ENGINEERING INC. HOBBS SERVICE FACILITY DISCHARGE PLAN REQUIREMENTS

(December 13, 1993)

- 1. <u>Drum Storage</u>: All drums will be stored on pad and curb type containment.
- 2. <u>Sump Inspection</u>: All sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will be approved be the OCD prior to installation and will incorporate secondary containment and leak detection in their designs.
- 3. <u>Tank Berming</u>: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain one and one-third times the capacity of the tank.
- 4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
- 5. <u>Modifications</u>: All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.
- 6. <u>Sump Effluent</u>: All effluent generated from the Acid Dock sump will be recycled as a disposal well treatment fluid.
- 7. <u>Sump Solids</u>: All solids generated in any sumps will be appropriately tested and receive OCD approval prior to disposal.



#### STATE OF NEW MEXICO

TONEY ANAYA
GOVERNOR

ROBERT P. MCNEILL
SECRETARY

ENVIRONMENTAL IMPROVEMENT DIVISION P.O. Box 968, Santa Fe, New Mexico 87504-0968 (505) 984-0020

Russell F. Rhoades, M.P.H., Director

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 6, 1983

Lloyd Bolding Acid Engineering, Inc. P.O. Box 753 Kilgore, Texas 75662

Dear Mr. Bolding:

The discharge plan (DP-249) for Acid Engineering, Inc., located on the north side of U.S. Highway 82 across from the Hobbs Airport, in Lea County, New Mexico (T18S, R37E, Section 36) is hereby approved. The approved plan consists of the plan dated September 14, 1982 and the materials dated April 29, 1982, October 28, 1982, December 7, 1982, and December 28, 1982 submitted as supplements to the discharge plan.

The discharge plan was submitted pursuant to Section 3-106 of the N.M. Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109. Please note subsections 3-109.E. and 3-109.F., which provide for possible future amendment of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

There will be no monitoring or reporting requirements.

Pursuant to subsection 3-109.G.4., this plan approval is for a period of five years. This approval will expire January 6, 1988, and you should submit an application for new approval in ample time before that date.

Sincerely,

RUSSELL F. RHOADES

Director

RFR:JH:jba

cc: John Guinn, District IV Manager, Roswell Hobbs EID Field Office Jack Ellvinger, EID Hazardous Waste Section

#### DISCHARGE PLAN

#### Monitoring and Reporting

Discharge Plan Number:_	DP-249 Original [	)P	
Date Approved:_	Modificat	ion	
Date Expires:			
Type of Facility:_	Oil Well Acidizing		
Name and Location of Facility:	Acid Engineering Inc		
Name, address and Telephone Number of	West of Hobb: on Hishway 62/180 across the road from Hobbs Country club. T185, R37E, Sec  Lloyd Bolding Acid Engineering Inc		36
EID Reviewer of Dischar	F.O. Box 753  Kilgore, Texas 75662  ge Plan: Joel Hubbell		
Monitoring Requirements	s: None		

Reporting Requirements: None

Reports Due: None