# GW - 77

# PERMITS, RENEWALS, & MODS

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John H. Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



#### **FEBRUARY 21, 2012**

Mr. Douglas Reed Schlumberger Technology Corporation 1105 West Bender Avenue Hobbs, NM 88240

Dear Mr. Reed:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit does not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit **GW - 073** (Dowell Schlumberger Hobbs Facility) is hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

Jami Bailey Director

JB/gvg

#### Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD

- Sent: Friday, August 29, 2008 1:07 PM
- To: 'thompson3@hobbs.oilfield.slb.com'
- Cc: Price, Wayne, EMNRD

Subject: GW-073, Schlumberger, Hobbs facility modification approval

#### Mr. Darwin Thompson

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Thank you for providing the NMOCD Environmental Bureau with information of your modification to your Hobbs facility.

# Your submitted modification noted in your letter dated August 26 2008 has therefore been APPROVED by the NMOCD Environmental Bureau.

As discussed over the phone I noted the following:

The 'low point' or sump that is built within your secondary containment area needs to be kept "dry" at all times, other then when holding fluids, due to fluids being drained from the containment area. Any fluids shall be removed within 72 hours, once noted. See your discharge permit conditions for details. A sump is not intended to hold fluids indefinitely.

If a sump is to hold fluids for long periods of time, it shall be designed with a secondary containment with leak detection.

The OCD recognizes your total volume for your sump to be 478 gallons (4' X 4' X 4'). If a sump is designed to have a volume greater then 500 gallons, it too shall be built with a secondary containment with leak detection system.

The OCD request that once your new tanks are in placed and completed that Schlumberger submit to the OCD photos and a new facility schematic of the modification, please identify all your sumps.

If you have any questions do not hesitate to call me.

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: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

# Schlumberger

# RECEIVED

2008 AUG 29 AM 10 35

Via Certified Mail Return Receipt 7001 1940 0006 6414 8845

August 26, 2008

Mr. Wayne Price New Mexico Oil Conservation Division 1220 S. St. Francis Dr. Santa Fe, NM 87505

Re: Discharge Plan GW-073 Schlumberger Technology Corporation 1105 W. Bender Ave. PO Box 640 Hobbs, NM 88240

Dear Mr. Price,

Schlumberger Technology Corporation, located at 1105 W. Bender Ave. Hobbs, New Mexico, in accordance with the Modification Procedures outlined in the Attachments to Ground Water Discharge Permit, GW-073 dated 12/11/06, is requesting permission to make the following modifications to the Schlumberger Facility located at 1105 W. Bender Ave. Hobbs NM.

We are proposing to locate two (2) 10,000 gallon diesel fuel storage tanks with the associated loading and dispensing equipment on a 113' by 46' cement slab with 8"containment curbing around the perimeter of the slab. These tanks will not be attached to a common manifold, as they will contain different types of diesel fuel. The diesel tanks are double lined steel "tanks within a tank" which by design include secondary containment for the inner tank within the outer tank wall. The containment area within the curbing of the cement slab will hold 25,941 gallons. This exceeds the 133% secondary containment required for the fuel delivery tankers while offloading into the 10,000 gallon tanks. Fuel tankers normally hold 7000 gallons. This curbing would also serve to contain any minor spills which could occur during equipment refueling operations. The curbed slab will be covered to prevent any storm water from entering the containment area.

The fueling area will be constructed to meet or exceed all State of New Mexico, City of Hobbs, and Schlumberger design criteria, and incorporate all current best design and safety features for fuel storage and dispensing systems.

This fuel storage and dispensing system will be located immediately south of the existing Truck Repair Facility as specified in the enclosed map. This location has been approved by the City of Hobbs Fire Marshall.

# Schlumberger

The Spill Prevention Control and Countermeasure Plan will be amended to reflect this change at the facility upon completion, pending approval from the NMOCD.

Because of the above mentioned design elements, and using Schlumberger's best management practices that relate to refueling equipment, it is our belief that this fuel storage and dispensing system will not pose any significant risk to the ground water quality at this facility.

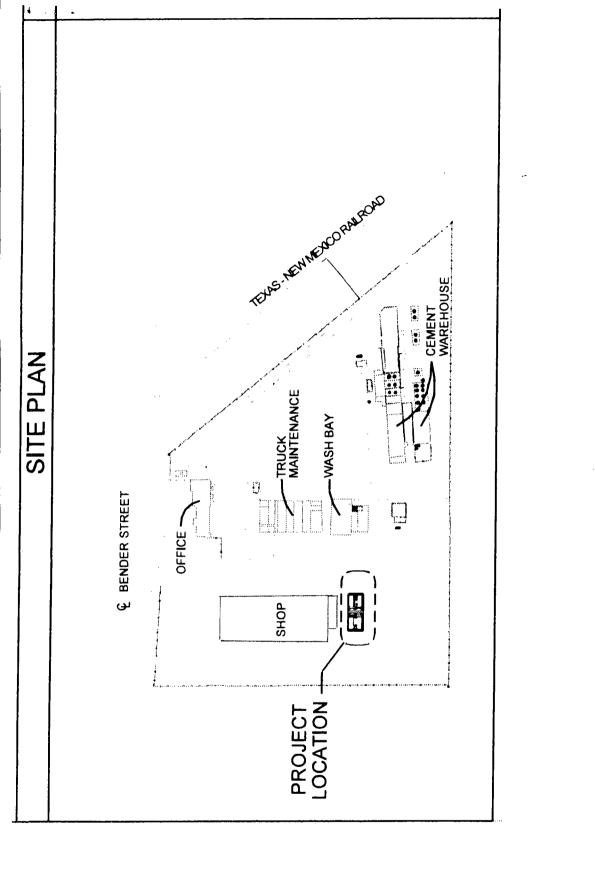
Thank you for your consideration of this Request for Modification to GW-073.

Sincerely,

Darwin Thompson

Darwin Thompson Facility Manager Schlumberger Hobbs/Artesia New Mexico

Encl. (1) Site Plan



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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

December 11, 2006

Mr. Darwin Thompson Schlumberger Technology Corporation 1105 West Bender Avenue Hobbs, New Mexico 88240

Re: Discharge Plan Renewal Permit GW-073 Hobbs Service Facility Lea County, New Mexico

Dear Mr. Thompson:

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 Schlumberger Technology Corporation (owner/operator) Hobbs Service Facility located in Unit Letter "B" (NWNE) of Section 28, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, under 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.

Please note that in the **Attachment to the Discharge Permit**, permit fees are due and payable upon receipt of this discharge permit renewal approval.

If you have any questions, please contact Ben Stone of my staff at (505-476-3474) or email ben.stone@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

LWP/BES Attachments-1 xc: OCD District Office

DISTRICT ROUTE S

#### ATTACHMENT TO THE DISCHARGE PERMIT SCHLUMBERGER TECHNOLOGY CORPORATION HOBBS SERVICE FACILITY (GW-073) DISCHARGE PERMIT APPROVAL CONDITIONS December 11, 2006

Please remit a check for \$1700.00 made payable to Water Quality Management Fund:

#### Water Quality Management Fund c/o: Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, New Mexico 87505

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 renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1700.00 renewal permit fee for an oil and gas service company.

2. Permit Expiration and Renewal: 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 December 10, 2011 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.

**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 May 30, 2006 discharge permit renewal 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 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant WQCC Regulation 20.6.2.3107.C NMAC, 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. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, 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 OCDapproved 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 OCDapproved 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 above-ground 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, 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> <u>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: <u>N/A</u>

**21. Transfer of Discharge Permit:** The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

**22. Closure:** The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: Schlumberger Technology Corporation, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. Schlumberger Technology Corporation 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:

**Schlumberger Technology Corporation** ompany Representative- print name 1-3-07 Company Representative signature Date Title Facility Manager



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

November 14, 2001

Lori Wrotenbery Director Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 3929 6887

Mr. Darwin Thompson Dowell Schlumberger 1105 West Bender Hobbs, New Mexico 88240

#### RE: Discharge Plan Renewal Approval GW-073 Dowell Schlumberger Hobbs Service Facility Lea County, New Mexico

Dear Mr. Thompson:

The ground water discharge plan renewal GW-073 for the Dowell Schlumberger Hobbs Service Facility located in the NW/4 NE/4 of Section 28, Township 18 South, Range 38 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 plan application was submitted on July 15, 1991 and approved October 22, 1991. The discharge plan renewal application, dated October 30, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 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 Dowell Schlumberger of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (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 provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Dowell Schlumberger 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. Darwin Thompson GW-073 Hobbs Service Facility November 14, 2001 Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **October 22, 2006**, and Dowell Schlumberger should submit an application in ample time before this date. Note that under 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 the results of an underground drainage testing program as a requirement for discharge plan.

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge plan application for the Dowell Schlumberger Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The OCD has not received the filing fee and is due upon receipt of this renewal approval.

Please make all checks payable to: Water Management Quality Management Fund C/o: Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. 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 Ć. Anderson Chief, Environmental Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Hobbs Office

#### ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-073 DOWELL SCHLUMBERGER HOBBS SERVICE FACILITY DISCHARGE PLAN APPROVAL CONDITIONS (November 14, 2001)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$100.00 filing fee has not been received by the OCD and is due upon receipt of this approval. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
- 2. <u>Dowell Schlumberger Commitments:</u> Dowell Schlumberger will abide by all commitments submitted in the discharge plan renewal application dated October 30, 2001 and these conditions for approval.
- 3. <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.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <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.
- 6. <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 tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <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.

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- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> 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 pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include 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.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee 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.
- 11. <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 closed 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.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Dowell Schlumberger's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
- 14. <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.
- 15. <u>Storm Water Plan:</u> The facility will have an approved storm water run-off plan.

- 16. <u>Closure:</u> The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service 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>Certification</u>: Dowell Schlumberger, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Dowell Schlumberger 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.

Accepted: DOWEILL SCHLÜMBERGER PERATIONS / AWAGER. by

Page 3 of 3



# NEW MEXICO ENERGY, MONERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

November 14, 2001

Lori Wrotenbery Director Oil Conservation Division

#### CERTIFIED MAIL RETURN RECEIPT NO. 3929 6887

Mr. Darwin Thompson Dowell Schlumberger 1105 West Bender Hobbs, New Mexico 88240

RE: Discharge Plan Renewal Approval GW-073 Dowell Schlumberger Hobbs Service Facility Lea County, New Mexico

Dear Mr. Thompson:

The ground water discharge plan renewal GW-073 for the Dowell Schlumberger Hobbs Service Facility located in the NW/4 NE/4 of Section 28, Township 18 South, Range 38 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 plan application was submitted on July 15, 1991 and approved October 22, 1991. The discharge plan renewal application, dated October 30, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 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 Dowell Schlumberger of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (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 provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Dowell Schlumberger 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. Darwin Thompson GW-073 Hobbs Service Facility November 14, 2001 Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **October 22, 2006**, and Dowell Schlumberger should submit an application in ample time before this date. Note that under 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 the results of an underground drainage testing program as a requirement for discharge plan.

Proposed modifications consisting of a new maintenance facility, office area and cement testing area is herewith approved.

The discharge plan application for the Dowell Schlumberger Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The OCD has not received the filing fee and is due upon receipt of this renewal approval.

Please make all checks payable to: Water Management Quality Management Fund C/o: Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. 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 Ć. Anderson Chief, Environmental Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Hobbs Office

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#### ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-073 DOWELL SCHLUMBERGER HOBBS SERVICE FACILITY DISCHARGE PLAN APPROVAL CONDITIONS (November 14, 2001)

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<u>Payment of Discharge Plan Fees:</u> The \$100.00 filing fee has not been received by the OCD and is due upon receipt of this approval. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. <u>Dowell Schlumberger Commitments:</u> Dowell Schlumberger will abide by all commitments submitted in the discharge plan renewal application dated October 30, 2001 and these conditions for approval.

3. <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.

4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

<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.

<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 tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. <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.

Page 1 of 3

<u>Labeling</u>: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

<u>Below Grade Tanks/Sumps:</u> 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 pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include 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.

10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee 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.

11. <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 closed 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.

12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Dowell Schlumberger's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.

13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. <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.

15. <u>Storm Water Plan</u>: The facility will have an approved storm water run-off plan.

Page 2 of 3

8.

9.

- <u>Closure</u>: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service 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.
  - <u>Certification:</u> Dowell Schlumberger, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Dowell Schlumberger 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.

by

Accepted:

#### DOWELL SCHLUMBERGER

Title

Page 3 of 3

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#### **NOTICE OF PUBLICATION**

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

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

(GW-073) – Dowell Schlumberger, Mr. Darwin Thompson, P.O. Box 640, 1105 West Bender, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Hobbs Oilfield Pumping Service Company facility located in the NW/4 NE/4, Section 28, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All waste water is collected in an above ground closed tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 78 feet with a total dissolved solids greater than 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of October, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LÓRI WROTENBERY, Director

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#### NOV 07 1996

Mr. John Miller Dowell Schlumberger GW-073 Page 3 October 15, 1996

Environmental Bureau Oil Conservation Division

#### ATTACHMENT TO DISCHARGE PLAN RENEWAL GW-073 Dowell Schlumberger - Hobbs Facility DISCHARGE PLAN REQUIREMENTS (October 15, 1996)

1. **Payment of Discharge Plan Fees**: The \$690 flat fee has not been received by the OCD and is due upon receipt of this approval. The flat fee may be paid in one lump sum or in five equal annual installments of \$138 over the term of the permit with the first payment due upon receipt of this approval.

2. <u>Dowell Schlumberger Commitments:</u> Dowell Schlumberger will abide by all commitments submitted in the renewal application dated September 3, 1996, submitted by Dowell Schlumberger, the discharge plan approval letter from OCD dated October 22, 1991, and this approval letter with conditions of approval from OCD dated October 15, 1996

3. **Drum Storage**: All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. 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 should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

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.

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. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. <u>Below Grade Tanks/Sumps</u>: 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 pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

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NOV 07 1996

Mr. John Miller Dowell Schlumberger GW-073 Page 4 October 15, 1996

Environmenter Bareau Oll Conservation Division

9. <u>Underground Process/Wastewater Lines</u>: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

10. <u>Housekeeping</u>: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any soils contaminated with a non-exempt waste at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **Spill Reporting**. All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Hobbs OCD District Office at (505)-393-6161.

12. <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.

13. <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.

14. <u>Groundwater Evaluation</u>: Dowell Schlumberger will conform with the "Soil Remmediation/Contamination Investigation" letter from OCD dated October 7, 1996 and its requirements.

15. <u>Certification:</u> Dowell Schlumberger, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Dowell Schlumberger, 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 groundwater, human health and the environment.

Accepted: Dowell Schlumberger

Title

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

October 15, 1996

#### CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-663

Mr. John Miller Remediation Manager Schlumberger Oilfield Services 300 Schlumberger Drive Sugar Land, TX 77478

#### RE: Renewal of Discharge Plan GW-073 Hobbs - Service Facility Lea County, New Mexico

Dear Mr. Miller:

The discharge plan renewal for the Dowell Schlumberger Hobbs Facility GW-073 located in the NE/4 NE/4, Section 28, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan renewal consists of the renewal application dated September 3, 1996, submitted by Dowell Schlumberger, the discharge plan approval letter from OCD dated October 22, 1991, and this approval letter with conditions of approval from OCD dated October 15, 1996. 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 renewal application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve **Dowell Schlumberger** of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

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.

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 Dowell Schlumberger 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.

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Mr. John Miller Dowell Schlumberger GW-073 Page 2 October 15, 1996

Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire October 22, 2001, and an application for renewal should be submitted in ample time before that date. 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 approval.

The discharge plan renewal for the Dowell Schlumberger Hobbs Facility GW-073 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars (\$50) and a flat fee of six-hundred and ninety dollars (\$ 690) for service companies renewing discharge plans.

The \$50 filing fee has been received by the OCD. The \$690 flat fee has not been received by the OCD and is due upon receipt of this approval. The flat fee may be paid in one lump sum or in five equal annual installments of \$138 over the term of the permit with the first payment due upon receipt of this approval.

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/pws Attachment

xc: Mr. Wayne Price - OCD Hobbs Mr. Randall Timms - Dowell Schlumberger, Hobbs Cert. Mail P-288-258-664

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#### NOV 07 1996

Mr. John Miller Dowell Schlumberger GW-073 Page 3 October 15, 1996

Environmental Bureau Oil Conservation Division

#### ATTACHMENT TO DISCHARGE PLAN RENEWAL GW-073 Dowell Schlumberger - Hobbs Facility DISCHARGE PLAN REQUIREMENTS (October 15, 1996)

1. <u>Payment of Discharge Plan Fees</u>: The \$690 flat fee has not been received by the OCD and is due upon receipt of this approval. The flat fee may be paid in one lump sum or in five equal annual installments of \$138 over the term of the permit with the first payment due upon receipt of this approval.

2. **Dowell Schlumberger Commitments:** Dowell Schlumberger will abide by all commitments submitted in the renewal application dated September 3, 1996, submitted by Dowell Schlumberger, the discharge plan approval letter from OCD dated October 22, 1991, and this approval letter with conditions of approval from OCD dated October 15, 1996

3. **Drum Storage**: All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. 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 should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

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.

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>Tank Labeling</u>: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. <u>Below Grade Tanks/Sumps</u>: 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 pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

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Mr. John Miller Dowell Schlumberger GW-073

Page 4

October 15, 1996

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Environmental Bureau Gil Conservation Division

9. <u>Underground Process/Wastewater Lines</u>: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

10. <u>Housekeeping</u>: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any soils contaminated with a non-exempt waste at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Hobbs OCD District Office at (505)-393-6161.

12. **Transfer of Discharge Plan:** 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.

13. <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.

14. <u>Groundwater Evaluation</u>: Dowell Schlumberger will conform with the "Soil Remmediation/Contamination Investigation" letter from OCD dated October 7, 1996 and its requirements.

15. <u>Certification:</u> Dowell Schlumberger, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Dowell Schlumberger, 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 groundwater, human health and the environment.

Accepted: Dowell Schlumberger

Mr. John Miller Dowell Schlumberger GW-073 Page 3 October 15, 1996

#### ATTACHMENT TO DISCHARGE PLAN RENEWAL GW-073 Dowell Schlumberger - Hobbs Facility DISCHARGE PLAN REQUIREMENTS (October 15, 1996)

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Mr. John Miller Dowell Schlumberger GW-073 Page 4 October 15, 1996

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

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13. <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.

14. <u>Groundwater Evaluation</u>: Dowell Schlumberger will conform with the "Soil Remmediation/Contamination Investigation" letter from OCD dated October 7, 1996 and its requirements.

15. <u>Certification:</u> Dowell Schlumberger, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Dowell Schlumberger, 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 groundwater, human health and the environment.

Accepted: Dowell Schlumberger

by

Title

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT



**OIL CONSERVATION DIVISION** 

ORIG

BRUCE KING GOVERNOR

October 22, 1991

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

CERTIFIED MAIL RETURN RECEIPT NO. P-327-278-253

Mr. M. L. Wood Dowell Schlumberger Inc. P.O. Box 640 Hobbs, New Mexico 88240

RE: Discharge Plan GW-73 Hobbs Service Facility Lea County, New Mexico

Dear Mr. Wood:

The groundwater discharge plan GW-73 for The Dowell Schlumberger Inc. Hobbs Service Facility located in the NE/4 NE/4, Section 28, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico is hereby approved. The discharge plan consists of the application dated July 15, 1991, and materials dated October 9, 1991, submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A. Please note Section 3-109.F., which provides for possible future amendments of the plan. Please be advised that 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.

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.

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 or 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 years. This approval will expire October 22, 1996, and

Mr. M. L. Wood October 22, 1991 Page 2

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you should submit an application for renewal in ample time before that date.

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/rca

xc: OCD Hobbs Office



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor

Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

December 11, 2006

Mr. Darwin Thompson Schlumberger Technology Corporation 1105 West Bender Avenue Hobbs, New Mexico 88240

Re: Discharge Plan Renewal Permit GW-073 Hobbs Service Facility Lea County, New Mexico

Dear Mr. Thompson:

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 Schlumberger Technology Corporation (owner/operator) Hobbs Service Facility located in Unit Letter "B" (NWNE) of Section 28, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, under 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.

Please note that in the **Attachment to the Discharge Permit**, permit fees are due and payable upon receipt of this discharge permit renewal approval.

If you have any questions, please contact Ben Stone of my staff at (505-476-3474) or email ben.stone@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

LWP/BES Attachments-1 xe: OCD District Office

## ATTACHMENT TO THE DISCHARGE PERMIT SCHLUMBERGER TECHNOLOGY CORPORATION HOBBS SERVICE FACILITY (GW-073) DISCHARGE PERMIT APPROVAL CONDITIONS December 11, 2006

Please remit a check for \$1700.00 made payable to Water Quality Management Fund:

## Water Quality Management Fund c/o: Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, New Mexico 87505

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 renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1700.00 renewal permit fee for an oil and gas service company.

 Permit Expiration and Renewal: 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 December 10, 2011 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.

**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 May 30, 2006 discharge permit renewal 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 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant WQCC Regulation 20.6.2.3107.C NMAC, 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. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, 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 OCDapproved 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 OCDapproved 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 above-ground 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, 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 foresceable 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> <u>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: <u>N/A</u>

**21. Transfer of Discharge Permit:** The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

**22. Closure:** The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

**23.** Certification: Schlumberger Technology Corporation, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. Schlumberger Technology Corporation 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:

#### Schlumberger Technology Corporation

Company Representative- print name

Company Representative- signature

Date

Title\_\_\_\_\_

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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

## 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)

1.	New     x Renewal     Modification       Type:    Service Company
2.	Operator:Schlumberger Technology Corporation
	Address:1105 West Bender Ave., Hobbs, NM 88240
	Contact Person:Darwin ThompsonPhone:505 393 6186
3.	Location:NW/4NE/4 Section28Township18SRange38E Submit large-scale topographic map showing exact location.
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 wastewater 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. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the pest of my knowledge and belief.
1	Name: Danwin Thompson Title:Facility Manager
9	Name: <u>Darwin Thompson</u> Title: <u>Facility Manager</u> Signature: <u>Darwin Thiompson</u> Date: <u>5-30-06</u>
	E-mail Address:thompson3@hobbs.oilfield.slb.com

## DISCHARGE PLAN GW-073 SCHLUMBERGER WELL SERVICES 1105 WEST BENDER HOBBS, NEW MEXICO RENEWAL APPLICATION 5/30/06

4. Landowner:

Schlumberger Technology Corporation 1105 West Bender PO Box 640 Hobbs, New Mexico 88240 505 393 6186

5. A map showing the location of the facility and a plot plan showing the above ground facilities is included as Attachment 1

6. A list of all materials stored or used at the facility are included as Attachment 2

7. Copies of the most recent analytical results for wastewater are included as Attachment 3.

The sources of effluent and waste solids from this facility include:

- A. Truck wash bay wastewater average daily volume is 3000 gallons.
- B. Wastewater from cement testing facility average daily volume is 30 gallons.
- C. Used engine oil is collected for recycling in the truck maintenance shop.
- D. Sludge from truck wash bay consists of mud and soil that is removed from trucks and equipment during the washing process.
- E. Cement residue is generated from washing of cups and other equipment used in the testing of cement samples in the cement testing area.
- F. Used floor sweep is generated in the truck maintenance area in the process of covering and cleaning oil spills on the shop floor.
- G. Domestic wastewater from facility restrooms.
- H. Used tires and vehicle batteries from the truck maintenance shop activities.
- I. Off-spec or contaminated chemicals from the chemical loading and blending process.
- J. Reclaimed cement from the cement loading and blending facility.
- 8. Liquid and solid waste collection and treatment procedures are as follows:
  - A. Truck wash bay water is treated by transferring water through two mudsettling pits to remove silt and other solids. The water then passes through an oil separator to remove oil and other hydrocarbons before wastewater is sent to Hobbs municipal sewer treatment facility.
  - B. Mud and sludge for truck wash bay is collected in mud settling pits and then transferred to a 20-yard roll-off bin. It is then analyzed and disposed of at an OCD approved waste disposal facility.
  - C. Wastewater from cement testing facility passes through a solids settling trap to remove fines from cleaning equipment used in the testing of cement samples. The water then is sent to Hobbs municipal sewer treatment facility.
  - D. The cement residue from the settling trap for the cement testing facility is collected in a settling trap and sent to an OCD approved landfill disposal site.

- E. Used engine oil is collected from the truck shop and stored in above ground steel tanks inside a steel secondary containment. The oil is then pumped into transport tanks for delivery to an approved treatment and recycling company.
- F. Used floor sweep is collected in plastic containers in the truck maintenance shop and then transferred to a roll-off bin to be disposed of at an OCD approved landfill disposal facility.
- G. Domestic wastewater is not collected or treated at this facility. It is discharged to the City of Hobbs wastewater treatment plant.
- H. Used tires and batteries from the maintenance shop are collected and returned to the manufacturer for recycling.
- I. Any off spec or contaminated chemicals are collected in steel or plastic drums and tote tanks, stored in a covered chemical storage area with secondary containment, and sent to an EPA approved disposal site to be recycled or disposed of in accordance with EPA regulations.
- J. Reclaimed cement is stored in an above ground steel cement storage tank, and sent to an OCD approved disposal site and recycled as a soil stabilizing material in landfill operations.

9. No additions or modifications are currently being planned for the Hobbs facility relating to any collection/treatment/disposal systems.

10. A routine inspection form is included as Attachment 4.

 A spill contingency and clean-up plan is included in the local SPCC plan, specifically in section 4.0. This section, including reporting instructions are included as Attachment 5.
 Geological/hydrological characteristics of the facility are as follows:

The geologic formation present at ground surface is the Tertiary Ogallala Formation, which consists of unconsolidated sands, silts, clays, and gravel, capped by caliche (Barnes 1976). The caliche cap at the site is approximately 25 to 35 feet thick and quite variable in thickness and composition. Beneath the caliche cap is orange-brown or yellow-brown fine-grained sand and sandstone with minor amounts of gravel. The thickness of the Ogallala is approximately 100 feet in the area (Barnes 1976). The Ogallala is underlain by red siltstones and claystones of Mesozoic age, referred to locally as the "red beds" (Richey et al. 1985).

The Ogallala Formation is the major aquifer in the Southern High Plains region and is pumped extensively for municipal, industrial, and agricultural purposes. Recharge to the Ogallala is primarily from infiltration of precipitation. Infiltration rates are locally variable, with highs occurring in areas such as the sand dune fields east of Hobbs and lows occurring where thick, extensive caliche layers are present.

Depth-to-water in the region has gradually increased over the past years because of excessive pumping. The water table at the site is approximately 80 feet below ground surface. The hydraulic gradient in the Ogallala aquifer near the site is approximately 15 feet per mile in a southeasterly direction (Cronin, 1969).

Ground water from the Ogallala is generally suitable for all purposes. Historical records indicate that total dissolved solids typically range from approximately 300 to 700 milligrams per liter (mg/L), chloride from 30 to 170 mg/L, and sulfate from 60 to 160 mg/L (Ash 1963).

13. There are no current plans to close this facility. If it were to be closed it would be closed in accordance with the Environmental Exit Survey Checklist enclosed as Attachment 6.

Attachment 1

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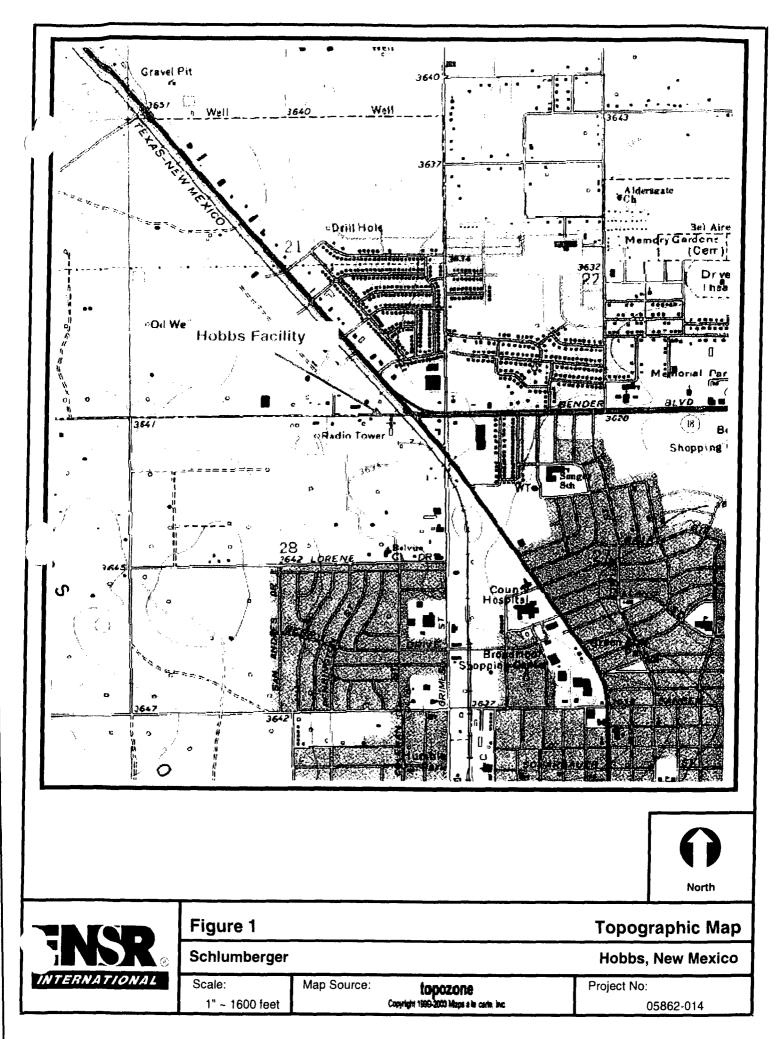
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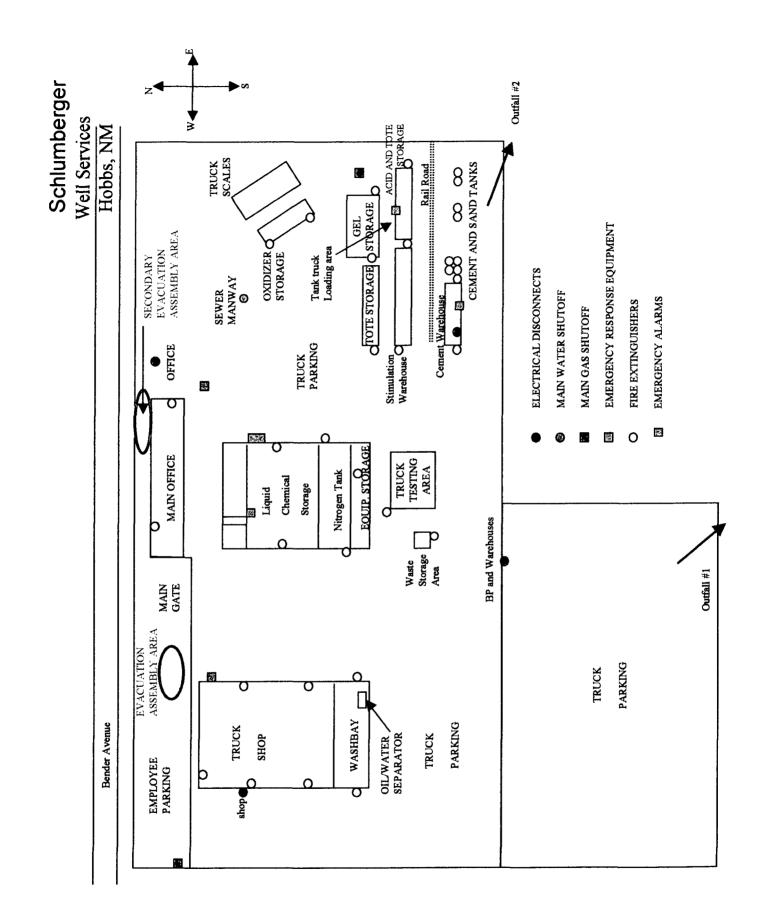
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# Attachment 2

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## CHEMICAL INVENTORY-ARTESIA SHOP

CHEMICAL	PRODUCT NAME	MANUFACTURER
OIL	15/40 MOTOR OIL	SHELL
OIL	C3	SHELL
OIL	80/90	SHELL
OIL	HYDRAULIC 46	SHELL
OIL	ROCK DRILL	SHELL
PENETRATING OIL	45NC	ZEP
OXYGEN	OXYGEN	AIRGAS
ACETYLENE	ACETYLENE	AIRGAS
PARTS CLEANING SOLVENT	150	SAFETY KLEEN
AIR FRESHNER		BLAIN
DISINFECTANT CLEANER	COMET	BLAIN
FLOOR CLEANER	EMERALD	BLAIN
TOILET BOWL CLEANER	VIM	BLAIN
UPHOLSTERY CLEANER	ARMOR COAT	BLAIN
CLEANER	VINEGAR	BLAIN
GLASS CLEANER	SPRAYWAY	BLAIN
SOAP	DIAL ANTIBACTERIAL SOAP	BLAIN

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Dmtei 05/31/2006 - 09:32 Pegei 0010

\* -----\*\*\*----------0.000 Max Stock Quantity Fluid Loss Additive, Slurr/Degred J478 Activator, Slurriable Crosslink 3465 Breeker, MD-CLEMM (tm) LF Encep J479 Gelling Agent, Slurrishie Guar 3457 Gelling agent, Mater Control 3491 \* Breekher, RB-CLEAM (tm) Br 3490 Fluid Loss Activator, LCA 3472 PROFEET (tm) II Additive J501 Coslbad Mythame Additive J473 Iron Control Agent, ICh 3471A Gelling Agent, CHUNG J486E Stabiliser/Delay Agent J511 Breeher, BB-CLERK (tm) 3475 Calling Agent, CHERG J486 ClearFlaCWinterized J508w Buffering Agent, 3464 Crossinher J492 Breeksr aid 3466 Crosslinks J506 Crossliaber J513 Breeksr J481 Description Material

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Plant Investory Standard Cost Analysis

Company: FTCD

Date: 05/31/2006 - 09132 Pager 0012

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Max Btock Quantity 

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----------0.000 0.000 0.000 0.000 FE Control Agent J602L CLANTTINC CO2 J575 Crosslinksr J601 Breeksr J603

-----0.000 0.000 0.000 0.000 0.000 \_\_\_\_\_ Slurry PSG Polymer Preblemded J\$77-PS Thread Locking Compound Mit M132 Besin Solution K2308 Catalyst £187 Methemol 346

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0.000 Indibitor, GTFBAN Scale L47 



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Company: STCD Date: 05/31/2006

Date: 05/31/2006 - 09:32 Pege: 0012

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Plant Inventory Standard Cost Analysis

Date: 05/31/2006 - 09:32 Pege: 0014

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Date: 05/31/2004 - 09:32 Page: 0001

Description terial ( Value \*

Max Stock Quantity

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-----0.000 0.000 0.000 0.000 Froppant, Low Dessity 18P 16/20 6105 Froppast, Med Density 182 30/60 895 gand 100 Meab \$100, Sached Sand 100 Mash \$100

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0.000 0.000 0.000 Froggast, Frecured Low Reain 20/40 \$128 Frogmat, F26000 0 1630 Medh Froppest, Fi6000 e 2040 Mash

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Plant Investory Standard Cost Analysis

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Date: 05/31/2006 - 09:32 Page: 0016

0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 Max Stock Quantity XB\$52 Acid Diverting Agent For Eigh Wate Sludge and Bunision Preventer W60 Geiling Agent, WC Dev 3367804 Memision/Sludge Preventar M35 Developmental Breaker 35941 Dev Cement Netardar XH587 Mon-Buisifying Agent 153 Non-Nucleifying Agent W54 Dev Gailing Agent XE983 Dev Galling Agent XE905 Cement Retarder Mill&A Chelating Agent U106 Bolvest, Matual 0100 Burfactant W59 Description interial

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PHONE (325) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SCHLUMBERGER ATTN: DARWIN THOMPSON P.O. BOX 300 ARTESIA, NM 88210 FAX TO:

Receiving Date: 11/08/05 Reporting Date: 11/15/05 Project Number: NOT GIVEN Project Name: Q4 WATER ANALYSIS Project Location: HOBBS YARD Sampling Date: 11/08/05 Sample Type: WASTEWATER Sample Condition: COOL AND INTACT Sample Received By: NF Analyzed By: HM

#### RCRA METALS

LAB NUMBER SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:	11/11/05	11/14/05	11/14/05	11/14/05	11/14/05	11/14/05	11/15/05	11/11/05
H10393-1 WASTEWATER	<0.1	<0.1	<1	<0.1	<0.1	0.448	<0.02	<0.1
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Quality Control	0.048	2.822	48.49	3.005	2.700	3.788	0.0052	0.051
True Value QC	0.050	3.000	50.00	3.000	3.000	4.000	0.0060	0.050
% Recovery	96	<b>94</b> .1	97.0	100	90.0	<b>94</b> .7	86.5	102
Relative Percent Difference	4.3	0.4	1.1	0.4	0.9	3.6	13.5	2.3
METHODS: EPA 600/4-79-020	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2
METHODS: SW-846	7060A	7760A	7080A	7130	7190	7420	7470A	7740

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<u>||-|6-25</u> Date

H10393

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PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by chent for an-dyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidienties, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SCHLUMBERGER ATTN: DARWIN THOMPSON P.O. BOX 300 ARTESIA, NM 88211 FAX TO:

Receiving Date: 11/08/05 Reporting Date: 11/16/05 Project Number: NOT GIVEN Project Name: Q4 WATER ANALYSIS Project Location: HOBBS YARD Sampling Date: 11/08/05 Sample Type: WASTEWATER Sample Condition: COOL & INTACT Sample Received By: NF Analyzed By: AH/BC

		ŔĔ	ACTIVITY		
LAB NO.	SAMPLE ID	Sulfide	Cyanide C	ORROSIVITY	IGNITABILITY
		(ppm)	(ppm)	(pH)	(°F)
ANALYSIS	DATE	11/14/05	11/14/05	11/11/05	11/16/05
H10393-1	WASTEWATER	Not reactive	Not reactive	7.21	>140
	•,·····•				
	·				
Quality Con	trol	NR	NR	6.98	NR
True Value		NR	NR	7.00	NR
% Recovery	,	NR	NR	99.7	NR
	rcent Difference	NR	NR	0.3	NR

METHOD: EPA SW-846 7.3, 7.2, 1010, 1311, 40 CFR 261

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11/16/03

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for an-ity set. All claims in group before a gligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiarities, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



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PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SCHLUMBERGER ATTN: DARWIN THOMPSON P.O. BOX 300 ARTESIA, NM 88211 FAX TO:

Receiving Date: 11/08/05 Reporting Date: 11/16/05 Project Number: NOT GIVEN Project Name: Q4 WATER ANALYSIS Project Location: HOBBS YARD Sampling Date: 11/08/05 Sample Type: WASTEWATER Sample Condition: COOL & INTACT Sample Received By: NF Analyzed By: AH

LAB NUMBER SAMPLE ID	COD (mg/L)	FOG (mg/L)	TSS (mg/L)
ANALYSIS DATE	11/14/05	11/11/05	11/11/05
H10393-1 WASTEWATER	317	118	7.00
			··· ·· ·· ··
		· 	 
Quality Control	22.09	99.7	NR
True Value QC	20.00	100	NR
% Recovery	110	99.7	NR
Relative Percent Difference	1.8	1.4	NR
METHODS: EPA 600/4-79-020	410.4	413.1	160.2

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11/16/05

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for an alyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. Intro event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiniates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

AK	AKUINAL LABORAI ORIES, INC. 2111 Beechwood, Abilene, TX 79603 (325) 673-7001 Fax (325) 673-7020	603 020	101 East Marland, Hobbs, NM 88240 (505) 393-2326 Fax (505) 393-2476	obba, 605) (	, NM 882 393-2476	18240 176						Page	• • • • • •	- 1
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roject Manager:	DEKANN MEVANICIN			٩	P.O. #: 450	8	349078	,						
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FOR LAB USE ONLY			MATRIX	{	M	PRESERV.	SAMPLING	DNI	22					
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r Cardinal ca	t Cardinal cannot accept verbal changes. Please fax written change	ten changes to (3)	is to (325) 673-7020.											

Attachment 4

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### WEEKLY ENVIRONMENTAL INSPECTION FORM

	YES	NO	NA
Yard and parking area free of spills?			
Waste/product storage containers and tanks in good condition, free of deterioration, properly labeled, and dated?			
Drum storage area free of spills or leaks and properly sealed?			
Slurry gel plant free of spills or leaks?			
Acid dock area free of spills and leaks?			
Cement plant free of spills and dust collector working properly?			
Stimulation warehouse free of spills?			
Fuel island clean and free of spills?			
Shop oil storage area free of spills and leaks?			
Is Safety-Kleen confined to the station?			
Paint and thinner properly stored?			
Batteries in proper storage area?			
Shop area free of spills?			
Are all hazardous waste containers closed?			
Are all hazardous waste containers in good condition with no signs of deterioration?			
Are all hazardous waste containers appropriately labeled, including an indication of the start date for waste accumulation?			
Are all hazardous waste containers under the generator status storage requirement for storage?			
Are the hazardous waste containers free of spills and leaks?			
Is Emergency Response Equipment in working order and properly stocked?			
Aboveground valves, piping, and appurtenances in good condition? (check flange joints, expansion			
joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces)			
Are all areas on site free of soil erosion indicators?			
Does the integrity of all small bulk oil storage containers (i.e.: drums and totes) appear to be uncompromised?			
Were all of the following small bulk oil storage containers (i.e.: drums and totes) elevated from the ground surface and inspected from all sides?			
Approximately 50 300-gallon totes stored in area A7.			
Approximately 50 300-gallon totes stored in area A8.			
Liquid level sensing devices operating properly?			
Facility drainage and effluent discharge points in good condition?			
Adequate aisle space available? (must be at least 3')			
	Waste/product storage containers and tanks in good condition, free of deterioration, properly labeled, and dated?         Drum storage area free of spills or leaks and properly sealed?         Slurry gel plant free of spills or leaks?         Acid dock area free of spills and leaks?         Cement plant free of spills and leaks?         Cement plant free of spills and leaks?         Stimulation warehouse free of spills?         Shop oil storage area free of spills and leaks?         Is Safety-Kleen confined to the station?         Paint and thinner properly stored?         Batteries in proper storage area?         Shop area free of spills?         Are all hazardous waste containers closed?         Are all hazardous waste containers in good condition with no signs of deterioration?         Are all hazardous waste containers appropriately labeled, including an indication of the start date for waste accumulation?         Are all hazardous waste containers under the generator status storage requirement for storage?         Are the hazardous waste containers free of spills and leaks?         Is Emergency Response Equipment in working order and properly stocked?         Aboveground valves, piping, and appurtenances in good condition? (check flange joints, expansion joints, avy eglands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces)         Are all areas on site free of soil erosion indicators?         Does the integrity of all small bulk oil s	Yard and parking area free of spills?         Waste/product storage containers and tanks in good condition, free of deterioration, properly labeled, and dated?         Drum storage area free of spills or leaks and properly sealed?         Slurry gel plant free of spills and leaks?         Acid dock area free of spills and leaks?         Cement plant free of spills and leaks?         Simulation warehouse free of spills?         Fuel island clean and free of spills and leaks?         Shop oil storage area free of spills and leaks?         Paint and thinner properly stored?         Batteries in proper storage area?         Shop area free of spills?         Are all hazardous waste containers closed?         Are all hazardous waste containers in good condition with no signs of deterioration?         Are all hazardous waste containers under the generator status storage requirement for storage?         Are the hazardous waste containers in good condition? (check flange joints, expansion joints, valve glands and bodies, catch pans, ippeline supports, tocking of valves, and metal surfaces)         Are all areas on site free of soil erosion indicators?         Does the integrity of all small bulk oil storage containers (i.e.: drums and totes) appear to be uncompromised?         Were all of the following small bulk oil storage containers (i.e.: drums and totes) elevated from the ground surface and inspected from all sides?         Approximately 50 300-gallon totes stored in area A7.	Waste/product storage containers and tanks in good condition, free of deterioration, properly

### ANY "NO" ANSWERS REQUIRE CORRECTIVE ACTION. DESCRIBE PROPOSED ACTIONS BELOW AND FOLLOW-UP WITH AN INDICATION OF THE DATE WHEN IMPLEMENTED. (attach additional sheets as necessary):

Inspector:\_\_\_\_\_Date:\_\_\_\_\_Date:\_\_\_\_\_

Retain completed forms in Attachment 14 of this Plan.

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## Attachment 5

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## 4.0 EMERGENCY RESPONSE PROCEDURES (COUNTERMEASURES)

### 4.1 <u>Objectives</u>

There are three primary objectives during a spill event. They are:

- (1) Stop the source of spill;
- (2) Contain the spill; and
- (3) Initiate remedial action.

The order of priority for the above objectives will vary depending on the events and at what stage the leak is detected. For oil tank spills, which have breached the containment system, containment activities should commence first. For spills associated with fires, remedial action should commence first. Consideration should be given to the fact that water used in fire fighting may cause an overflow of the spill containment systems. The general emergency response plan for spills of oil and/or hazardous substances consists of the following four steps:

- (1) The spill <u>must</u> be reported immediately to the On Site Emergency Coordinator (refer to the On Site Emergency Call List in Attachment 5).
- (2) The Emergency Coordinator will determine which outside assistance organizations to contact, if any, and make the necessary arrangements (refer to the Off Site Emergency Notification Phone List in Attachment 7) to stop the leak, to contain the leak, and initiate the form of remedial action necessary.
- (3) The Emergency Coordinator in conjunction with a representative from the Schlumberger Emergency Response System (phone #: 281-595-3518) will determine which governmental agencies are required to be notified and ensure that these notifications are made in a timely manner.
- (4) The Emergency Coordinator will ensure that all non-Schlumberger communications (i.e., news media) follow company policy.

The intent of this Plan is to provide the information necessary to respond properly to a spill event. Generally, this facility could have four types of spill events.

- (1) <u>Contained Spill</u> spill inside diked areas and all material is contained.
- (2) <u>Controlled Small Spill</u> spill outside diked areas that is small enough not to spread offsite.
- (3) <u>Uncontrolled Spill</u> a spill large enough to exceed diked capacity (due to weather or fire fighting water make-up) or the spill is outside of diked area, and the spill has significant potential to go offsite.
- (4) <u>Reportable Spill</u> the spill enters navigable waters or exceeds the reportable quantity for the material spilled. Refer to section 5.1.4 or the website www.regulations.com.

## 4.2 Spill Response Equipment

A list of available on site emergency response equipment and the location of each item is provided in Attachment 8. The location of this equipment is also shown on the facility Emergency Evacuation Diagram provided in Attachment 3. Other information that may be useful during an emergency event is provided below.

- There are several hand-held radios available at the facility, which would be useful for communications.
- Outside contractors are available to provide additional response personnel and equipment. A listing of local spill cleanup contractors is provided in Attachment 6.

### 4.3 Emergency Coordinator's Response

After receiving a report of a spill or other emergency, the Onsite Emergency Coordinator must proceed with the following:

### Protect Personnel

- (1) Determine the extent of personal injuries, if any.
- (2) Identify the exact location of spill, leak or other emergency event utilizing appropriate personal protective equipment. If necessary, walk out all process lines, hoses, manifold, piping, and tanks involved in the operation. Identify the leaking appurtenance(s) (e.g., hose, flange, valve, tank, etc.).
- (3) Determine if site evacuation is necessary. If an evacuation is required, it will be announced over the facility's public address (PA) system. The evacuation routes and assembly areas are shown on a map posted on the office bulletin board.
- (4) Shut-off any potential ignition sources.
- (5) Confirm if the event is still occurring and when it was first observed.

### Contact Schlumberger/NAM

(6) Contact the Schlumberger/NAM HSE Emergency Response System and follow the steps presented in Section 5.1 Spill Notification (Attachment 7).

### Control the Emergency Event

- (7) Confirm the extent of spill, leak, or emergency and determine the potential for personnel hazard by utilizing product knowledge such as the product information sheet or material safety data sheets (MSDS).
- (8) Determine methods to safely control the event. Minimize the potential discharge by isolating the source of the leak. <u>If necessary</u>, utilize any of the following steps to mitigate the leak:
  - Empty transfer lines;
  - Transfer product from a leaking tank to a sound tank;

- Isolate transfer lines by valve and/or blind flange;
- Isolate the ongoing operation in accordance with standard operating procedures to minimize both potential hazards to personnel and damage to equipment;
- Check for ignition sources (i.e., heaters, open flames, hot work); or
- Other appropriate actions.
- (9) Verify that spill containment devices are working and/or install new ones as necessary.

### Initiate Off-Site Notifications and/or Coordination

- (10) Evaluate whether there are apparent on-site or off-site hazards associated with the event. Contact any off site entities that could be impacted by the spill.
- (11) Contact appropriate outside emergency response contractors if their help is needed (see Attachment 6 for the contact phone numbers).
- (12) Determine present and predicted weather conditions at the facility.
- (13) Ensure that the applicable federal, state, and local emergency response agencies are notified in a timely manner. This will be performed in conjunction with a representative from the Schlumberger/NAM HSE Emergency Response System (see Attachment 7 for the notification phone numbers).
- (14) Determine Schlumberger contact for non-Schlumberger communications, if necessary. Based on the above criteria, the Emergency Coordinator will implement the most appropriate response.

### Monitor the Situation

(15) If facility operations have stopped in response to the emergency situation, monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate.

### Clean-up Spilled Material

(16) Initiate recovery, removal, decontamination, and reporting procedures, as appropriate.

### 4.4 Other Considerations

### 4.4.1 Container Leaks

As stated in Section 3.4.1 of this Plan, leaks and/or equipment malfunctions are promptly reported, repaired, and remediated. In addition, facility personnel must follow the procedures outlined below when a leaking drum or tote are identified:

# Schlumberger

<u>Drum</u>: If a leaking drum is detected, the contents remaining in the drum will be transferred to a new drum if this can be done safely by properly trained personnel. The empty drum will be put in the empty storage area for disposal or reclamation. If the contents cannot be safely transferred to another drum, then the leaking drum will be placed in a DOT-approved overpack drum for off-site disposal. Any spillage and clean up materials will also be placed into the overpack drum for disposal. A label will be placed on the overpack drum identifying the contents and the original date that it was placed in storage.

<u>Tote:</u> Leaking totes will be handled the same way as leaking drums except if the contents cannot be safely transferred to another drum or tote, then stop the leak, if possible, then contain the area with absorbent material.

### 4.4.2 Decontamination

Equipment that requires decontamination will be decontaminated by using a highpressure wash or by another appropriate method such as, but not limited to, a detergent wash. Any wastes generated during decontamination procedures will be collected and disposed of offsite at an authorized facility.

Any equipment that cannot be decontaminated will be disposed of offsite at an authorized facility.

### 4.4.3 Disposal of Recovered Materials

Materials recovered due to oil and/or hazardous substance discharge cleanup efforts will be managed in an environmentally sound manner. Disposal or recycling of such materials will be conducted in accordance with federal and state requirements as applicable to management of solid waste. Efforts to recycle the recovered material will be made to the extent possible.

### 4.4.4 Arrangements with Local Authorities

This facility is a CESQG of hazardous waste. As such, this facility is not required to make prior arrangements with local authorities regarding coordination of potential emergency response actions. However, if the facility becomes a SQG or LQG of hazardous waste, the appropriate revisions will be made to this plan to include documentation of the arrangements. Copies of the transmittal letters sent to each of the appropriate local authorities will be included in Attachment 9. Information concerning hazardous substances and waste stored at the site is kept in the Emergency Coordinator's office. This information will be provided to police, firefighters, hospitals and other emergency response personnel as needed.

### 4.5 Oil Spill Contingency Planning

This section is not applicable to the Hobbs facility.

## ON-SITE EMERGENCY CALL LIST (In order of priority)

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## SCHLUMBERGER/NAM HSE EMERGENCY RESPONSE SYSTEM: 281-595-3518

(See Attachment 7 for additional off site emergency notification numbers)

Designated Emergency Response Role	Name & Title	Contact Numbers
Primary On Site Emergency Coordinator	Randy Cothren Operations Manager	Work: 505-393-6186 Home: 505-738-8077 Cell: 505-910-2460 Pager: N/A
Secondary On Site Emergency Coordinator	Luis Granados Field Service Manager	Work: 505-393-6186 Home: 505-392-4634 Cell: 505-910-2461 Pager: N/A
1 <sup>st</sup> Alternate On Site Emergency Coordinator	Mike Martin Bulk Plant Supervisor	Work: 505-393-6186 Home: 505-392-2647 Cell: 505-910-2477 Pager: N/A
2 <sup>nd</sup> Alternate Emergency Coordinator	Brad Bounds QHSE Coordinator	Work: 505-393-6186 Home: 505-393-7698 Cell: 505-910-2459 Pager: N/A
Corporate Emergency Coordinator / Media Communications Officer	Kirk Pepper USL QHSE Manager	Work: 281 285 8119 Home: N/A Cell: 504 913 0477 Pager: N/A
Corporate Emergency Coordinator (capable to commit manpower & financial resources)	Kirk Pepper USL QHSE Manager	Work: 281-285-8119 Home: N/A Cell: 504 913 0477 Pager: N/A

SPCC/RCRA Contingency Plan Issued: April 3, 2006

Hobbs Plan Hobbs, New Mexico

## Attachment 6

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## Environmental Exit Survey Checklist

This checklist shall be completed by Schlumberger personnel prior to the disposal, or release of any Schlumberger property (whether leased, owned, or otherwise occupied). It should be completed by persons knowledgeable of environmental aspects and impacts. Once complete, the checklist shall be reviewed by a Schlumberger environmental/legal professional, prior to disposal (sale or release) of the property, prior to contacting external environmental consultants, and prior to initiation of any remediation action.

Will the property be sold, returned to owner, leased to a third-party, or other?

If the property is to be sold, has a buyer been identified?

Proposed date of sale/release of property \_\_\_\_\_

Estimated cost of property or monthly lease payments \_\_\_\_\_\_

Has all Schlumberger property (equipment, signs, chemicals, wastes, vehicles, etc.) that is not being sold with the property been removed from the site?

Describe any specific time frames or special needs with regard to the environmental exit survey:

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#### **Facility Information**

Date of Exit Survey:

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A. Owner/Occupant of facility/property Name \_\_\_\_\_ Address Occupant (if different from Owner): Name\_\_\_\_\_ Address \_\_\_\_\_ Date Current Occupant Took Possession B. Current use of Facility/Property (describe) Zoning Vacant/Open\_\_\_\_\_ Other\_ C. Total Acreage of Property\_\_\_\_\_ No. of Buildings on Property No. of Employees \_\_\_\_\_

D. Past Use of Facility/Property Prior to current Occupant (describe). Go as far back as possible; add additional pages as necessary.

Commercial	
Industrial	
Residential	
Vacant/Open	
Other	

## **PART I - SITE INSPECTION**

1. Grounds Inspection – Describe nature of inspection:

a)	Distressed Vegetation Describe:	Ycs	No
b)	Soil Staining Describe:	Ycs	No
c)	Excavation/Filling Describe:	Ycs	No
<u>Raw</u>	Materials Used or Stored on Site		
a)	Solvents	Yes	No
b)	Plating Chemicals	Ycs	No
c)	Paints	Yes	No
d)	Coolants, Lubricants	Yes	No
e)	Polychlorinated biphenyls	Ycs	No
f)	Fuels and Hydrocarbon Products	Yes	No
g)	Other (specify)	Yes	No
h)	Any concerns regarding signs of improper use or storage Describe:	Yes	No
i)	Are floor drains present in storage or use area?	Yes	No

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3 Drum/Chemical Storage Yes Yes	No
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Describe the Storage area (size, location on site, containment structures, capacity, etc.).

a)	Is there a concrete storage pad for chemical containers?	Yes	No
b)	Does the pad have a concrete containment wall or berm?	Yes	No
c)	Does the pad have a sump?	Yes	No
d)	Are there floor drains in the storage area? If yes, where do they drain?	Yes	No
e)	Is storage area covered with roof?	Yes	No
f)	Is there any indication of past releases/spills from the storage area?	Yes	No
g)	Have all chemicals been removed?	Yes	No
4. <u>\</u>	Vaste Disposal		
a)	Is there any evidence/knowledge of on-site waste disposal?	Yes	No
	If yes, describe:		
	1. Landfill?	Yes	No
	2. Evidence of Filling?	Yes	No
	3. Lagoon/Surface impoundment?	Yes	_ No
	4. Ponds/Drainage ditches?	Yes	No

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5. Waste piles?	Yes	No
6. Disposal wells?	Yes	No
7. Incineration?	Yes	No
8. Construction debris?	Yes	No
9. Road Oiling?	Yes	No
10. Other (describe):		
5. <u>Hazardous Waste Generation</u> Have hazardous wastes been generated on site?	Var	No
generated on site?	Yes	NO
If Yes, have all wastes been removed from site and properly disposed?	Yes	No
<ul> <li><u>Air Emissions</u></li> <li>Have sources of air emissions been</li> <li>present on site?</li> </ul>	Ycs	No
If Yes, have all air emissions sources been removed from the site or decommissioned?	Yes	No
a) No. of process stacks		
b) Permits?	Yes	No
c) Permit Violations: If Yes describe:	Yes	No

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7. a)	Wastewater Discharge On-site Treatment Facility? (i.e., zero-discharge system, treatment plant)	Yes	No
b)	On-site Pretreatment Facility? (i.e., sump. oil/water separator)	Yes	No
C)	On-site Treatment or Pretreatment Facility? If yes, describe type of system, configuration of separator, etc. (i.e., capacity, number of compartments, where fluids enter an	d exit, etc.).	
d)	Wastewater discharge (if yes, describe)?		
	1. To sewer?	Yes	No
	2. To storm sewer?	Yes	No
	3. To stream, lake. etc.?	Yes	No
	4. To on-site disposal well(s)?	Yes	No
	5. To septic system or leach field?	Yes	No
	6. To percolation pond?	Yes	No
	7. Other? (describe)	Ycs	No
c)	Septic Tank ? If yes, describe (age of tank, volume, secretion, etc.):	Ycs	No
ſ)	Stormwater Discharge (specify)		
	1. To stream, lake, etc.?	Yes	No
	<ol> <li>To stormwater sewer?</li> <li>To retention/treatment pond?</li> </ol>	Yes	No No
	4. Other?	Yes Yes	No
g)	Have all wastewater facilities (zero discharge, recycle units, sumps, trenches, oil/water separators, septic tanks, etc.), been cleaned and all wastes removed?	Yes	No

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8.	Underground Tanks (past and present)	_Yes	No	
D	escribe:			
a)	Number; age; volume			
			Yes	No
c)	Material of construction			
d)	Manufacturer (if known)			
e)	Leak detection devices (monitoring?)			
	Contents			
g)	Leak tested?; Test results?;			
h)	Registered with Regulatory Agency?		Yes	No
	Any spills?		Yes	
~	Removed?		Yes	No
J)	If yes, is there a tank removal report available?		Yes	
	If no, have all tanks been cleaned and tank contents			
	either destined for use or properly disposed?		Yes	No
9.	Above Ground Storage Tanks		Yes	No
De	scribe:			
a)	If yes, numberage; volume;			
b)	Material of construction			
	Manufacturer (if known)			
	In service?		Yes	No
c)	Contents	<u></u>		
d)	Are/were the tanks properly contained?		Yes	No
~ ,	Describe containment:			
e)	Are there drains in the containment structure?		Yes	No
	If yes, describe their destinations:			
f)	Describe condition of tanks:			
(J)	Any spills?		Yes	No
51	If yes, describe:		103	110
h)	Have all tanks been cleaned and tank contents either			
	destined for use or properly disposed ?		Yes	No
i)	Have above ground tanks been removed from site?		Yes	No

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10. Parts Cleaning/Degreasing Operation

	a)	Туре		
	b)	Location		
	c)	Volume		
	d)	Previous type		
	e)	Have all part washer/degreasing operations been		
		decommissioned and wastes properly disposed?	Yes	No
	f)	Have all tanks been cleaned and tank contents		
		either destined for use or properly disposed?	Yes	No
<b>[]</b> .	<u>We</u>	lls observed on site		
	Do	es the facility obtain water from an on-site well?	Yes	No
		es, is it:		
		Private?	Yes	No 
		Municipal? Other? Describe:	Yes Yes	No
	0)		103	
	Are	there any groundwater monitoring wells on-site? Yes	sNo	
		es, describe:		
	Ha	s well closure been considered?	Yes	No
12.	Site	drainage		
		General direction of drainage:		
	b)	Proximity of drainage to:		
		<ul> <li>Creeks:</li> <li>Lakes/Ponds:</li> </ul>		
		- Lakes/Ponds.		
	Are	there any concerns that site drainage has contributed		
		ollution of the site or any surrounding area?	Yes	No
		es. describe:		
12	Da	and Amon		
13.		ved Areas		
	a) b)	Pavement type:Approximate % of site covered:		
	-,			
14.		/Geologic Conditions		
		Describe surface soils		
	b)	Describe shallow subsurface conditions (i.e., clay layers, water leve	(I. etc.)	

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15. Asbestos			
a) Were the facilitie	es on the property constru-	cted prior to 1979?	
Yes No	Unknown	N/A	
b) Has a formal. doc	umented asbestos survey	of the facilities been condu	cted?
Yes No	Unknown	N/A	
If yes, did the sur materials?	vey report conclude that	he buildings are free of asb	estos-containing
Yes	No	Unknown	N/A
	* • • •	any obvious evidence of ins	

fire proofing, or building materials that may contain asbestos that appear to be friable. flaking, damaged or broken?

See referenced report for the following information:

	Yes	No	Unknown	N/A
Pipe insulation				
Duct insulation				
Boiler insulation				
Floor/Ceiling tiles				
Sprayed-on ceiling				
Stucco, plaster, fiberboard/				
wall finishes				<u></u>
Roofing materials				
Comments				

16. Radon

a) Have any radon tests been performed at the property?							
	Yes	No	Unknown	N/A			
lfy	ves, describe res	ults:					

 $\overline{b}$ ) If elevated radon levels have been discovered at the property, have ventilation systems

or similar remedial measures been implemented?								
Yes	No	Unknown	N/A					
Describe:								
			······································					

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#### 17. Indoor Pollution

a) Does the facility appear to be free of any obvious sources of air emissions that have chemical odors, fumes, or mists?

Yes No Unknown N/A

### 18. Polychlorinated Biphenyls (PCBs)

a) Does the facility contain any equipment such as transformers or capacitors?

 
 Yes
 No
 Unknown
 N/A

 b)
 Has the equipment been checked for PCB content? Yes
 No
 Unknown
 N/A

If yes, by whom, when? Are there documented results?

c) If PCB-containing electrical equipment is present at the property, is it marked with PCB identification labels?

Yes No	Unknown	N/A
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d) If PCB-containing electrical equipment is present at the property, is there evidence of leaks or spills on the ground adjacent to the equipment?

Yes	No	Unknown	N/A	
Comments				
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### PART II – SURROUNDING AREA

- 1. Surrounding Land Uses
  - a) (North)
  - b) (South)
  - c) (East)
  - d) (West)

2. Potential sources of concern (air emissions, site drainage, groundwater contamination, etc.)

- a) (North)
- b) (South)
- c) (East)
- d) (West)
- 3. <u>Walk property boundaries looking for signs of possible source of contamination from</u> <u>surrounding property.</u>

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- a) Past or present excavations.
- b) Equipment cleaning stations:
- c) Rubble piles:
- d) Inhibited plant growth:
- c) Waste or chemical storage areas:
- f) Underground or above ground storage tanks:

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4. Describe general direction of surface drainage for area. (Sketch)

### PART III - REGULATORY REVIEW

1. Are there any notices of violations or similar claims from any regulatory agencies?

- 2. Are there any pending legal actions related to environmental matters?
- 3. Are there any outstanding complaints (from citizens groups, residences, etc.)?

### **PART IV - ADDITIONAL DOCUMENTATION**

- 1. Attach site diagram. Include buildings, chemical storage, waste storage, process and disposal areas. outfalls, signs of contamination, etc.
- 2. Attach current and past aerial photographs (where available) documenting past uses.
- 3. Include photographs or video documenting present conditions of facility.

### **PART V - CONCLUDING REMARKS**

(Please include any concluding remarks or additional information here)

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