

GW - 200

**GENERAL
CORRESPONDENCE**

YEAR(S):
2007 - 1991

THE SANTA FE
● NEW MEXICAN ●
Founded 1849

12
NM EMNRD OIL CONSERVATION

ATTORNEY Price
1220 S ST FRANCIS DR
SANTA FE, NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00201723 ACCOUNT: 00002212
LEGAL NO: 80359 P.O. #: 52100-00044
292 LINES 1 TIME(S) 163.52
AFFIDAVIT: 6.00
TAX: 12.93
TOTAL: 182.45

1 FEB

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 80359 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/05/2007 and 02/05/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 5th day of February, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 5th day of February, 2007

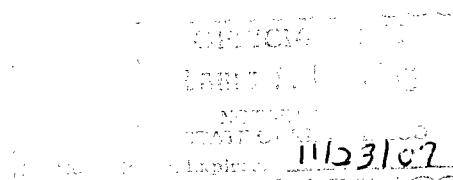
Notary

Laura R. Harding

Commission Expires:

11/23/07

OK To Ad
Lara



**NOTICE OF
PUBLICATION**

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

Notice is hereby given
that pursuant to New
Mexico Water Quality
Control Commission
Regulations

(20.6.2.3106 NMAC),
the following dis-
charge permit appli-
cation(s) has been
submitted to the Di-
rector of the New
Mexico Oil Conserva-
tion Division
("NMOCD"), 1220 S.
Saint Francis Drive,
Santa Fe, New Mexico
87505, Telephone
(505) 476-3440:

**(GW-200) Key Energy
Services, Inc., Bob
Patterson, Area Man-
ager, 418 S. Grimes,
Hobbs, New Mexico
88240, telephone
#505-394-2581, has
submitted a renewal
application for its dis-
charge plan at the
Hobbs service com-
pany yard, located at
418 S. Grimes in NW/4
NW/4 of Section 3,
Township 19 South,
Range 38 East, NMPM,
Lea County, New Mex-
ico. Primary business
activity is transporta-
tion of oilfield fluids.
Groundwater most
likely to be affected
by these operations is
at a depth of approxi-
mately 40-60 feet with
a total dissolved soli-
ds concentration of
500 mg/l. The dis-
charge plan ad-
dresses how oilfield
materials and waste
will be properly han-
dled, stored, and dis-
posed of, including
how spills, leaks, and
other accidental dis-
charges to the sur-
face will be managed
in order to protect
fresh water.**

The NMOCD has de-
termined that the ap-
plication is adminis-
tratively complete
and has prepared a
draft permit. The
NMOCD will accept
comments and state-
ments of interest re-
garding this applica-
tion and will create a
facility-specific mail-
ing list for persons
who wish to receive
future notices. Per-
sons interested in ob-
taining further infor-
mation, submitting
comments or request-
ing to be on a
facility-specific mail-
ing list for future no-
tices may contact the
Environmental Bureau
Chief of the Oil Con-
servation Division at
the address given
above. The adminis-

trative completeness
determination
draft permit may be
viewed at the above
address between 8:00
a.m. and 4:00 p.m.,
Monday through Fri-
day, or may also be
viewed at the NMOCD
web site
<http://www.emnrd.state.nm.us/ocd/>. Per-
sons interested in ob-
taining a copy of the
application and draft
permit may contact
the NMOCD at the ad-
dress given above.
Prior to ruling on any
proposed discharge
permit or major modi-
fication, the Director
shall allow a period of
at least thirty (30)
days after the date of
publication of this no-
tice, during which in-
terested persons may
submit comments or
request that NMOCD
hold a public hearing.
Requests for a public
hearing shall set forth
the reasons why a
hearing should be
held. A hearing will be
held if the Director
determines that there
is significant public
interest.

If no public hearing is
held, the Director will
approve or disap-
prove the proposed
permit based on in-
formation available,
including all com-
ments received. If a
public hearing is held,
the director will ap-
prove or disapprove
the proposed permit
based on information
in the permit applica-
tion and information
submitted at the
hearing.

Para obtener más in-
formación sobre esta
solicitud en español,
sírvase comunicarse
por favor: New Mex-
ico Energy, Minerals
and Natural Re-
sources Department
(Depto. Del Energia,
Minerals y Recursos
Naturales de Nuevo
México), Oil Conser-
vation Division
(Depto. Conserva-
ción Del Petróleo),
1220 South St. Francis
Drive, Santa Fe, New
Mexico (Contacto:
Dorothy Phillips,
505-476-3461)

GIVEN under the Seal
of New Mexico Oil
Conservation Com-
mission at Santa Fe,
New Mexico, on this
30th day of January
2007.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

SEAL

Mark Fesmire,
Director

Legal #80359
Pub. Feb. 5, 2007

NOTICE OF PUBLICATION

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

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

(GW-200) - Key Energy Services, Inc., Bob Patterson, Area Manager, 418 S. Grimes, Hobbs, New Mexico 88240, telephone #505-394-2581, has submitted a renewal application for its discharge plan at the Hobbs service company yard, located at 418 S. Grimes in NW/4 NW/4 of Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Primary business activity is transportation of oilfield fluids. Groundwater most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of January 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 30, 2007

Mr. Bob Patterson
Key Energy Services
P.O. Box 99
Eunice, NM 88231

Re: Discharge Permit GW-200
Hobbs Service Yard

Dear Mr. Patterson:

The New Mexico Oil Conservation Division (NMOCD) has received your request and initial fee to renew GW-200 Key Energy Services (owner/operator) Hobbs Service Yard GW-200 located in the NW/4 NW/4 of Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

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

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3490 or wayne.price@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely:

Electronic signature013007700310

Wayne Price
OCD-Environmental Bureau Chief
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3490
fax: 505-476-3462
E-mail: wayne.price@state.nm.us
xc: OCD District I



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 29, 2007

Mr. Bob Patterson
Key Energy Services
P.O. Box 99
Eunice, NM 88231

Re: Discharge Permit GW-200
Hobbs Service Yard

Dear Mr. Patterson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Key Energy Services (owner/operator) Hobbs Service Yard GW-200 located in the NW/4 NW/4 of Section 3, Township 19 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.

If you have any questions, please contact me at (505-476-3490) or E-mail Wayne.price@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:

electronic signature 0130077003310-1

Wayne Price
OCD-Environmental Bureau Chief

Attachments-1
xc: OCD District Office

**ATTACHMENT TO THE DISCHARGE PERMIT
KEY ENERGY SERVICES, HOBBS SERVICE YARD (GW-200)
DISCHARGE PERMIT APPROVAL CONDITIONS
January 29, 2007**

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 oilfield 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 September 25, 2010** 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 July 29, 2005 discharge plan 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 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

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

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

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD 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. *An unauthorized discharge is a violation of this permit.*

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

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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

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

Company Name-print name above

Company Representative- print name

Company Representative- signature

Title_____

Date:_____

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, January 30, 2007 12:32 PM
To: 'Patterson, Bob'
Cc: Johnson, Larry, EMNRD
Subject: RE: Key Energy Hobbs Trucking Yard Discharge Plan
Attachments: Renewal WQCC Notice Regs.pdf; PermitNotice_2007.DOC; AdmCompLetter_2007.DOC; GW200DPApproval_2007.doc

Dear Bob,

Please find attached a copy of the renewal procedure for public notice, public notice, Admin complete letter, and the permit. You have to post notice per the new reg's see attachment (renewal) to assist you. After 30 days please sign the permit conditions and return with \$1700 fee. You have to provide proof that you posted notice, just send a picture of the sign and other info of proof.

From: Patterson, Bob [mailto:bpatterson@keyenergy.com]
Sent: Tuesday, January 30, 2007 9:43 AM
To: Price, Wayne, EMNRD
Subject: Key Energy Hobbs Trucking Yard Discharge Plan

Wayne,
I have no record on a renewed discharge plan for the above yard.

Bob Patterson

1/30/2007

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, January 30, 2007 12:33 PM
To: Stone, Ben, EMNRD
Subject: FW: Key Energy Hobbs Trucking Yard Discharge Plan GW-200
Attachments: PermitNotice_2007.DOC; AdmCompLetter_2007.DOC; GW200DPAapproval_2007.doc

Please post.

From: Price, Wayne, EMNRD
Sent: Tuesday, January 30, 2007 12:32 PM
To: 'Patterson, Bob'
Cc: Johnson, Larry, EMNRD
Subject: RE: Key Energy Hobbs Trucking Yard Discharge Plan

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Wayne,
I have no record on a renewed discharge plan for the above yard.

Bob Patterson

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, January 30, 2007 12:45 PM
To: Thompson, Bruce C., DGF; Shendo, Benny, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda_Rundell@nm.blm.gov'; 'sthompson@ago.state.nm.us'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'seligman@nmoga.org'; Martinez, Elysia, NMENV; 'lwa@lwasf.com'; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; 'jbarnett@barnettwater.com'; Bearzi, James, NMENV; 'mschulz@theitgroup.com'; 'bsg@garbhall.com'; 'jcc_crb@pacbell.net'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'ken@carihobbs.com'; Price, Wayne, EMNRD
Subject: FW: Key Energy Hobbs Trucking Yard Discharge Plan GW-200
Attachments: PermitNotice_2007.DOC; AdmCompLetter_2007.DOC; GW200DPApproval_2007.doc

FYI; new public notice for OCD sites

From: Price, Wayne, EMNRD
Sent: Tuesday, January 30, 2007 12:33 PM
To: Stone, Ben, EMNRD
Subject: FW: Key Energy Hobbs Trucking Yard Discharge Plan GW-200

Please post.

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Cc: Johnson, Larry, EMNRD
Subject: RE: Key Energy Hobbs Trucking Yard Discharge Plan

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To: Price, Wayne, EMNRD
Subject: Key Energy Hobbs Trucking Yard Discharge Plan

Wayne,
I have no record on a renewed discharge plan for the above yard.

Bob Patterson

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7/28/05
7/26/05
or cash received on _____ in the amount of \$ 100.00

from KEY ENERGY SERVICES, INC.

for HOBBS YARD GW-200

Submitted by: WAYNE PRICE (Family Name) Date: 7/26/05 (DP No.)

Submitted to ASD by: WA Date: "

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____




Modification _____ Other _____ (signature)

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

THE FACE OF THIS DOCUMENT IS PRINTED BLUE - THE BACK CONTAINS A SIMULATED WATERMARK

	KEY ENERGY SERVICES, INC. Central Processing Payment Center 8 Desia Drive, Suite 4400 Midland, Texas 79705 (432) 571-7320	PNC BANK, NATIONAL ASSOCIATION JEANETTE, PA Check Date <u>7/28/2005</u> No. [REDACTED]	8-9/430
PAY <u>One Hundred Dollars and No Cents</u>			
TO THE ORDER OF	NM ENRGY, MNRLS, & NAT RESC DEPT OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DRIVE SANTA FE NM 87504 <u>GW-200</u>	 AUTHORIZED SIGNATURE IF OVER \$10,000.00 MP	

Hobbs 412 yard
District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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 FACILITIES
AND CRUDE OIL PUMP STATIONS**

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

☐ New ☒ Renewal ☐ Modification

1. Type: Oil and Gas Service Company

2. Operator: Key Energy Services
Address: Box 99, Eunice, NM 88231
Contact Person: Bob Patterson

Phone: (505) 394-2581

3. Location: NW/4 NW/4 Section 3 Township 19S Range 38E
Submit large scale topographic map showing exact location.

On File with OCD Santa Fe

4. Attach the name, telephone number and address of the landowner of the facility site.

On File with OCD Santa Fe

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

On File with OCD Santa Fe

6. Attach a description of all materials stored or used at the facility.

On File with OCD Santa Fe

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

On File with OCD Santa Fe

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

On File with OCD Santa Fe

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

On File with OCD Santa Fe

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

On File with OCD Santa Fe

11. Attach a contingency plan for reporting and clean-up of spills or releases.

On File with OCD Santa Fe

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

On File with OCD Santa Fe

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

On File with OCD Santa Fe

14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Bob Patterson

Title: Area Manager

Signature: Bob Patterson

Date: 7-29-5

E-mail Address: bpatterson@keyenergy.com

Company : KEY ENERGY SERVICES, INC.

CHECK NO. [REDACTED]

INVOICE NO.	INVOICE DATE	GROSS	DISCOUNT	NET AMOUNT
407 DISCHARGE PLAN Message : RENEW	7/16/2005 PLAN GW 200	100.00 HOBBS 412 NM	.00	100.00
TOTALS		100.00	.00	100.00

REMOVE DOCUMENT ALONG THIS PERFORATION

Company : KEY ENERGY PERMIAN BASIN

10/12/2000

CHECK NO. [REDACTED]

INVOICE NO.	INVOICE DATE	GROSS	DISCOUNT	NET AMOUNT
412 411 GW-200	10/05/2000	690.00	.00	690.00
TOTALS		690.00	.00	690.00

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 10/12/00,
or cash received on _____ in the amount of \$ _____

from KEY ENERGY SERVICES, INC.

for HOBAS SERVICE YARN

GW-200

Submitted by: WAYNE PRICE (Family Name) Date: 10/23/00 (DP No.)

Submitted to ASD by: [Signature] Date: 10/23/00

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ☒

Modification _____ Other _____
(Optional)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____



KEY ENERGY SERVICES, INC.
PERMIAN BASIN DIVISION
P.O. BOX 10627
MIDLAND, TX 79702
(915) 570-5721

PNC BANK, NATIONAL ASSOCIATION
JEANNETTE, PA
60-162/433

No. [REDACTED]

Check Date 10/12/2000

PAY Six Hundred and Ninety Dollars and No Cent

\$*****690.00

TO THE
ORDER
OF

WATER QUALITY MANAGEMENT FUND

GW-200

[Signature]
AUTHORIZED SIGNATURE IF OVER \$10,000.00

Memorandum

To: YARD MANAGERS
CC: Ray Ramsey, Tommy Pipes, & Gene Butler
From: Safety Department
Date: 5/4/00
Re: Environmental Reporting

As per the meeting on May 3, 2000 the following was decided:

Environmental spills or any incident is to be reported on a timely manner.

The customer or operator of well usually needs to report spill.

Report a spill to the Oil Conservation Division at district office for area in which release occurred depending on the amount of the spill.

Reporting deadlines for Major Releases (anything of 25 bbls +) OCD needs to be notified by phone call within 24 hours of discovery. Minor Releases (5 to 25 bbls) written notice on Form C-141 within 15 days of spill.

As company policy any spill is to be reported with a KS10 and notification to be followed up by division chain of command. However a spill of any thing with 3 bbls or more is to be reported to Gene Butler with a phone call in a timeframe of 30 minutes after a spill. Gene can be reached at the numbers below.

Gene Butler's Numbers

(915) 620-0300 ext 249 Office

(915) 631-002 Cell

1-877-775-6194 Pager

(915) 683-2902 Home

If you have any questions or need additional information on reporting environmental spills please be sure to call Gene Butler.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact	
Address	Telephone No.	
Facility Name	Facility Type	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
-------------	---------	----------	-------	---------------	------------------	---------------	----------------	--------

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
Describe Area Affected and Cleanup Action Taken.*		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature:		OIL CONSERVATION DIVISION
Printed Name:		
Title:	Approved by District Supervisor:	
Date:	Approval Date:	Expiration Date:
Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary

Affidavit of Publication

STATE OF NEW MEXICO)

) ss.

COUNTY OF LEA)

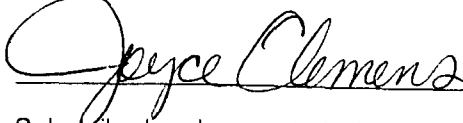
Joyce Clemens being first duly sworn on oath deposes and says that she is Advertising Director of **THE LOVINGTON DAILY LEADER**, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

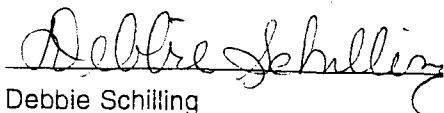
Legal Notice

was published in a regular and entire issue of **THE LOVINGTON DAILY LEADER** and not in any supplement thereof, for one (1) day, beginning with the issue of August 15, 2000 and ending with the issue of August 15, 2000.

And that the cost of publishing said notice is the sum of \$ 71.28 which sum has been (Paid) as Court Costs.



Subscribed and sworn to before me this 16th day of
August 2000



Debbie Schilling

Notary Public, Lea County, New Mex

My Commission Expires June 22, 2001

LEGAL NOTICE
NOTICE OF
PUBLICATION
STATE OF
NEW MEXICO
ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-319)-R&R Service Co. Inc., Bob Strasner, President, P.O. Box 1409, Hobbs, New Mexico 88241, telephone #505-393-5661, has submitted an application for a discharge plan for its Hobbs service company yard, located at 1500 West Broadway Place in NE/4 SW/4 of Section 33, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Primary business activity is sand-blasting, coating and painting of oilfield equipment. Groundwater most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-200)-Key Energy Services, Inc., Pete Turner, Hobbs Trucking Manager, 418 S. Grimes, Hobbs, New Mexico 88240, telephone #505-397-4994, has submitted a renewal application for its discharge plan at the Hobbs service company yard, located at 418 S. Grimes in NW/4NW/4 of Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Primary business activity is trans-

portation of oilfield fluids. Groundwater most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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(s) may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through 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 a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe,

New Mexico, on this 8 day of August, 2000.

STATE OF
NEW MEXICO

CONSERVATION
DIVISION

LORI WROTENBERG
Director

SEAL

Published in the
Lovington Daily Leader
August 15, 2000.

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OCD
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-319) - R&R Service Co. Inc., Bob Strasser, President, P.O. Box 1409, Hobbs, New Mexico 88241, telephone #505-393-6661, has submitted an application for a discharge plan for its Hobbs service company yard, located at 1500 West Broadway Place in NE/4 SW/4 of Section 33, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico.

Primary business activity is sandblasting, coating and painting of oilfield equipment. Groundwater most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-200) Key Energy Services Inc., Pete Turner, Hobbs Trucking Manager, 418 S. Grimes, Hobbs, New Mexico 88240, telephone #505-397-4994, has submitted a renewal application for its discharge plan at the Hobbs service company yard, located at 418 S. Grimes in NW/4 NW/4 of Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Primary business activity is transportation of oil-

most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks and other accidental discharges to the surface will be managed in order to protect fresh water.

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 8th day of August, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

AD NUMBER: 165359 ACCOUNT: 56689
LEGAL NO: 67908 P.O.#: 00199000278
239 LINES 1 time(s) at \$ 105.36
AFFIDAVITS: 5.25
TAX: 6.91
TOTAL: 117.52

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67908 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/15/2000 and 08/15/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 15 day of August, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

B. Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
15 day of August A.D., 2000

Notary

Laura E. Harding

Commission Expires

11/23/03

*Approved
Wagner
8/22/00*

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

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(GW-200) - Key Energy Services, Inc., Pete Turner, Hobbs Trucking Manager, 418 S. Grimes, Hobbs, New Mexico 88240, telephone #505-397-4994, has submitted a renewal application for its discharge plan at the Hobbs service company yard, located at 418 S. Grimes in NW/4 NW/4 of Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Primary business activity is transportation of oilfield fluids. Groundwater most likely to be affected by these operations is at a depth of approximately 40-60 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how oilfield materials and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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 through 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 a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of August, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


LORI WROTENBERY, Director

S E A L

Company : KEY ENERGY PERMIAN BASIN

7/27/2000

CHECK NO. [REDACTED]

INVOICE NO.	INVOICE DATE	GROSS	DISCOUNT	NET AMOUNT
411 Message :	7/21/2000	50.00 DISCHARGE PLAN RENEWAL	.00	50.00
GW200				
TOTALS		50.00	.00	50.00

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 7/27/2000
or cash received on in the amount of \$ 50⁰⁰
from KEY ENERGY SERVICES, INC.
for HOBBS YARD GW-200-

Submitted by: WAYNE PRICE (Filing Name) Data: 8/3/00 (DP No.)

Submitted to ASD by: Data: "

Received in ASD by: Data:

Filing Fee ☒ New Facility ☐ Renewal ☐

Modification ☐ Other ☐ (Specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☐ or Annual Increment ☐



KEY ENERGY SERVICES, INC.
PERMIAN BASIN DIVISION
P.O. BOX 10627
MIDLAND, TX 79702
(915) 570-5721

PNC BANK, NATIONAL ASSOCIATION
JEANNETTE, PA
60-162/433

No.

Check Date 7/27/2000

PAY and Fifty Dollars and No Cent

\$ 50.00

TO THE ORDER OF NEW MEXICO OIL CONSERVATION

GW 200

AUTHORIZED SIGNATURE IF OVER \$10,000.00



Key Energy Services, Inc.

Key Energy Services, Inc.

DISCHARGE PLAN

HOBBS TRUCKING YARD

418 South Grimes
Hobbs, New Mexico 88240

Prepared by: Vision Technology, Inc.
July -2000



Table of Contents

Hobbs Discharge Plan

TABLE OF CONTENTS

	<u>Page</u>
Discharge Plan Application	1
Type of Facility	2
Name and Address of Owner/Operator	2
Address of Facility	2
Contact Person at Facility	2
Alternate	2
Location	2
Facility Description	3
Materials Stored or Used at the Facility	3
Sources and Estimated Quantities of Waste	3
Summary Description of Existing liquid and Solids Waste Collection and Disposal	4-5
Proposed Modifications	6
Routine Inspection and Maintenance Plan	6
Contingency Plan for Reporting and clean-up of spills or releases	6
Geological/Hydrological Evidence	6
Other information that Demonstrates Compliance with other OCD rules, Regulations and/or Orders.	7

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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 FACILITIES
AND CRUDE OIL PUMP STATIONS**

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

☐ New ☒ Renewal ☐ Modification

1. Type: Oil and Gas Service Company

2. Operator: Key Energy Services
Address: Box 99, Eunice, NM 88231
Contact Person: Bob Patterson

Phone: (505) 394-2581

3. Location: NW/4 NW/4 Section 3 Township 19S Range 38E
Submit large scale topographic map showing exact location.

On File with OCD Santa Fe

4. Attach the name, telephone number and address of the landowner of the facility site.

On File with OCD Santa Fe

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

On File with OCD Santa Fe

6. Attach a description of all materials stored or used at the facility.

On File with OCD Santa Fe

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

On File with OCD Santa Fe

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

On File with OCD Santa Fe

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

On File with OCD Santa Fe

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

On File with OCD Santa Fe

11. Attach a contingency plan for reporting and clean-up of spills or releases.

On File with OCD Santa Fe

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

On File with OCD Santa Fe

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

On File with OCD Santa Fe

14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Bob Patterson

Title: Area Manager

Signature: *Bob Patterson*

Date: 7-29-5

E-mail Address: bpatterson@keyenergy.com



Key Energy Services, Inc.

EXHIBIT INDEX

Hobbs Discharge Plan

Exhibit Index

- 1 **Facility Site Plan Map** – Facility Location
 - 2a **Facility Description – Diagram**
 South half – trucking yard
 - 2b **Facility Description – Diagram**
 North half- Rig-up shop
 - 3a **Product – Quantities - Location**
 - 3b **MSDS – Information**
 - 4 **Reporting and Clean-up** – contingency plan
-
-



General Information

Hobbs Discharge Plan

Page 1 of 7

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

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

New ☐ Renewal ☒ Modification ☐

1. Type: Oil and Gas Service Company
2. Operator: Key Energy Services, Inc.
Address: 418 S. Grimes Hobbs, New Mexico 88240
Contact Person: Pete M. Turner Phone: (505) 397-4994
3. Location: NW 1/4 NW 1/4 Section 3 Township 19S Range 38E
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 waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Pete M. Turner

Signature: 

Title: Hobbs Trucking Manager

Date: 7-18-2000



General Information

Hobbs Discharge Plan

Page 2 of 7

I. Type of Facility

Oil & gas service company that provides transportation of fluids, used in, or in connection with, the discovery, development, production, refining, processing and or storage of natural gas and petroleum, and their products and by-products.

II. Name and Address of Owner/Operator

Key Energy Services, Inc.
6 Desta Drive Suite 5900
Midland, Texas 79705
(915) 620-0300

Address of Facility

418 South Grimes Street
Hobbs, New Mexico 88240

Contact Person at Facility

Pete Turner, Yard Manager
Business Phone: (505) 397-4994
Cell Phone: (505) 631-8995

Alternate

Bruce Baird
Business Phone: (505) 397-4994
Cell Phone: (505) 910-4138

Jerry Wolz
Business Phone: (505) 397-4994
24-Hour Phone: (505) 910-4139

III. Location

NW/4, NW/4, Section 3, Township 19S, Range 38E,
400 Block South Grimes Hobbs, New Mexico
(Exhibit 1 – Facility Site Plan)



V. Facility Description

(See Exhibits 2a and 2b)

VI. Materials Stored or Used at the Facility

1. Drilling Fluids – None
2. Brine (KCL, NACL, etc.) See Exhibit III
3. Acids/Caustics – None
4. Detergents/Soaps – See Exhibit III
5. Solvents/Degreasers – See Exhibit III
6. Paraffin Treatment/Emulsion Breakers – See Exhibit III
7. Biocides – None
8. Others – See Exhibit III

VII. Sources and Estimated Quantities of Waste

1. **Truck Waste** – All fluids hauled away from this terminal are off loaded at our customer's locations or work facilities. **No waste generated.**
2. **Truck Washing** – Key Energy only washes the exterior of our vehicles at this facility. This is to remove every day dirt, grime, etc. Key Energy **does not rinse out** tanks or product barrels at this facility.
3. Our equipment is **cleaned** with high pressure washer, scrub brushes and soap. (Brown truck soap) (see Exhibit 3) **Cleaning solvents are not used** during vehicle washing procedures.
4. **Solvents/Degreasers** are **not used** in any of our trucking operations. Key Energy employs E & E Enterprises to services and recycles solvents used in the shops.
5. **Spent acids, caustics or completion fluids** wastes **are not generated** at this facility.
6. **Waste slop oil** - **not generated at this facility.**
7. **Used lubrication and motor oils** – engine oils, which are drained during vehicle maintenance programs, generate approximately 170 gallons per month. This oil is stored in tanks marked **used motor oil only.**



General Information

Hobbs Discharge Plan

Page 4 of 7

8. **Used oil filters** are drained for 24 hours into our waste motor oil tank, then they are put into drums marked **used oil filters only.** Key Energy employs E & E Enterprise to pickup and recycle the filters.
9. **Solids and sludge from tanks** – are **not generated** at this facility.
10. **Painting wastes** – Key Energy uses a paint thinner burner that recycles the thinner and produces approximately 30 lbs. Of non-hazardous waste per year. This waste is approved by the city of Hobbs to go in the dumpster once it is dry.
11. **Sewage** – The only commingling of fluids to the domestic sewage system comes from our vehicle washbay. This fluid is used to wash road tar, dirt and grime caused by daily operations. Degreasers and solvents **are not** used during this operation. An estimated volume of **3,000 gallons per month** of water is used for this purpose.
12. **Other waste liquids** – **No waste generated.**
13. **Other waste solids** – **no other solid waste** Empty drums and pails are picked for recycling up on a regular basis by the companies that sell the products to Key Energy. We accumulate approximately eight drums prior to pickup.

VIII. Summary Description of Existing Liquid and Solids Waste Collection and Disposal

1. **Truck Waste** – **No waste generated.**
2. **Truck, tank and drum washing** – Only the exterior of tractor/trailer vehicles are washing at this facility. All fluids drain into a 1 ½" floor drain and then directly into a concrete sand trap which collects the heavy sands. Fluids then pass through a 3" siphon in the concrete petitioned sump into another section of the trap which allows more setting time and provides trapping for skim oil. Waters then pass into the City of Hobbs sewage system. This sump and accumulated sludge were last inspected by the State of New Mexico Environmental Division and the New Mexico Oil Conservation Division in the last quarter of 1994. Analytical results are on file covering fluids and sediments.



General Information

Hobbs Discharge Plan

Page 5 of 7

After approximately 1 ½ - 2 years of services the sludge that has build-up in the trap is placed into plastic lined pits and approval is received from Oil Conservation Division before removal to an approved disposal facility. Tanks or drums **are not rinsed out** at this facility.

3. **Steam cleaning of parts equipment, tanks** – vehicles are externally washed with a high pressure washer in the washbay (See Exhibit 2 A)
4. **Solvents/Degreasers** are not used for any vehicle cleaning. Parts cleaner the shops are recycled by E & E Enterprises.
5. **Spent acids, caustics or completion fluids** - **are not generated** at this facility.
6. **Waste slop oil** – **is not generated** at this facility.
7. **Used motor oil** – are stored in enclosed 575 gallon metal tanks located on concrete pads (See Exhibit 2a and 2b). This used oil is then picked up by E & E Enterprises for recycling. All pick-ups are documented on a uniform manifest prior to removal.
8. **Used oil filters** – are stored in enclosed metal drums sitting on concrete pads prior to E & E Enterprise picking them up for recycling.
9. **Solids and sludge from tanks** – are **not generated** at this facility.
10. **Painting wastes** – Key Energy uses a paint thinner burner that recycles the thinner and produces approximately 30 lbs. of non-hazardous wastes per year. This waste is approved by the city of Hobbs to go in the dumpster once it is dry.
11. **Sewage** – all sewage flows to the City of Hobbs swage system.
12. **Other waste liquids** – **not generated** at this facility.
13. **Other waste** – sediments from the sand trap of our washbay is stored on plastic lined above ground impoundment pits until approval is received by the Oil Conservation Division for disposal.



General Information

Hobbs Discharge Plan

Page 6 of 7

IX. Proposed Modifications

All used oil containers will have containment walls to catch any accidental spills. (See Exhibit 2a).

X. Routine Inspection and Maintenance Plan

A visual documented inspection will be performed on the sand trap each time it is cleaned. The District 1 office of the Oil Conservation Division will be notified prior to this inspection. All lines will be plugged and the sand trap will be filled with water letting it set for 24 hours to test for any leaks.

Drivers and supervisory personnel make visual checks daily. A facility safety/environmental inspection checklist is made on a monthly basis.

XI. Contingency Plan for Reporting and Clean-up of Spills or Releases

(See Exhibit 4)

XII. Geological/Hydrological Evidence

Physical Setting (Topography) – The topographic map shows the subject property to be located in the western half of the city of Hobbs, New Mexico. The topography of the subject property and the lands in its vicinity slopes gently to the south-southeast, with an approximate elevation of 3,630 feet above mean sea level (MSL). Drainage in the area generally follows the topography and is toward the south-southeast. A Copy of that portion of the topographic map showing the subject property is included as Figure 1.

Flood Plain Status – Personnel at the City of Hobbs, City Engineer's office provided access to the Federal Emergency Agency (FEMA) flood plain maps for Hobbs, New Mexico area. According to the FEMA flood plain maps the subject property was determined to be outside the 500-year flood plain.

Hydrology – The Ogallala Formation of late Miocene to early Pliocene – age is the primary water bearing unit in the study area. The Ogallala Formation or Ogallala aquifer consists of heterogeneous sequences of clay, silt, sand, and gravel. A resistant layer of calcium carbonate-



General Information

Hobbs Discharge Plan

Page 7 of 7

cemented caliche known as the "caprock" occurs near the surface of much of the area.

Water levels in the Ogallala aquifer are primarily influenced by the rate of recharge to and discharge from the aquifer. Recharge to the aquifer, which generally is under water-table conditions, occurs primarily by infiltration of precipitation on the surface. To a lesser extent, recharge may also occur by upward leaking from underlying Cretaceous-age units that in places have a higher potentiometric surface than the Ogallala aquifer.

Groundwater movement in the Ogallala aquifer is generally from northwest to southeast. Velocities of less than 1 foot per day are typical, but higher velocities may occur along filled erosional valleys where coarser grained deposits have greater permeabilities. The approximate altitude of the water-table in the Hobbs, New Mexico area is from 3,550 feet to 3,575 feet MSL, respectively. The saturated thickness of the Ogallala aquifer in the area is approximately 80 feet.

In the study area, the dissolved solids in the Ogallala aquifer range from less than 1,000 mg/l to over 3,000 mg/l, and chloride concentrations typically range from less than 300 to over 1,000 mg/l.

No bodies of water, streams, canals or other water courses are located within one mile of this facility. Water wells within the general area are domestic.

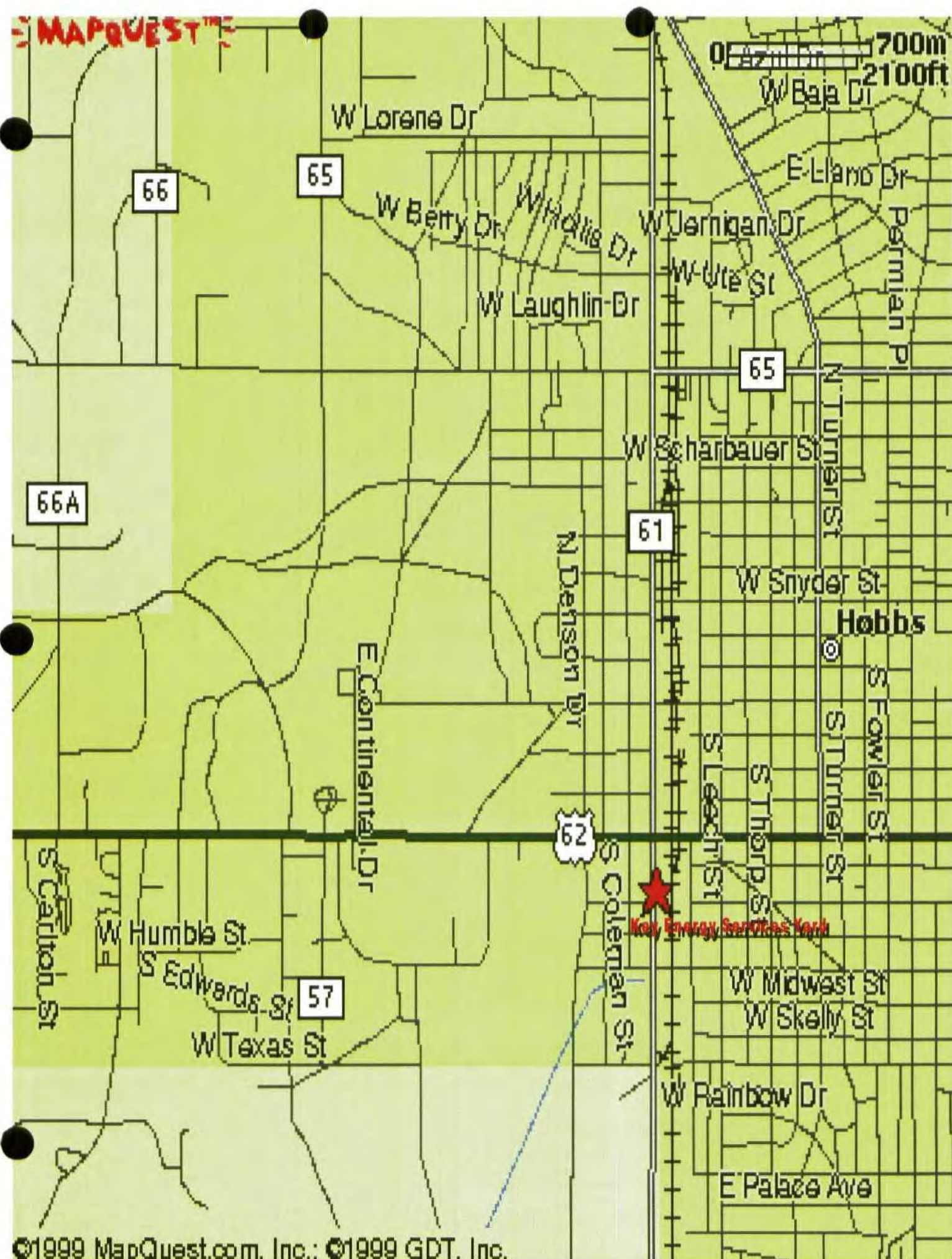
Soil type:

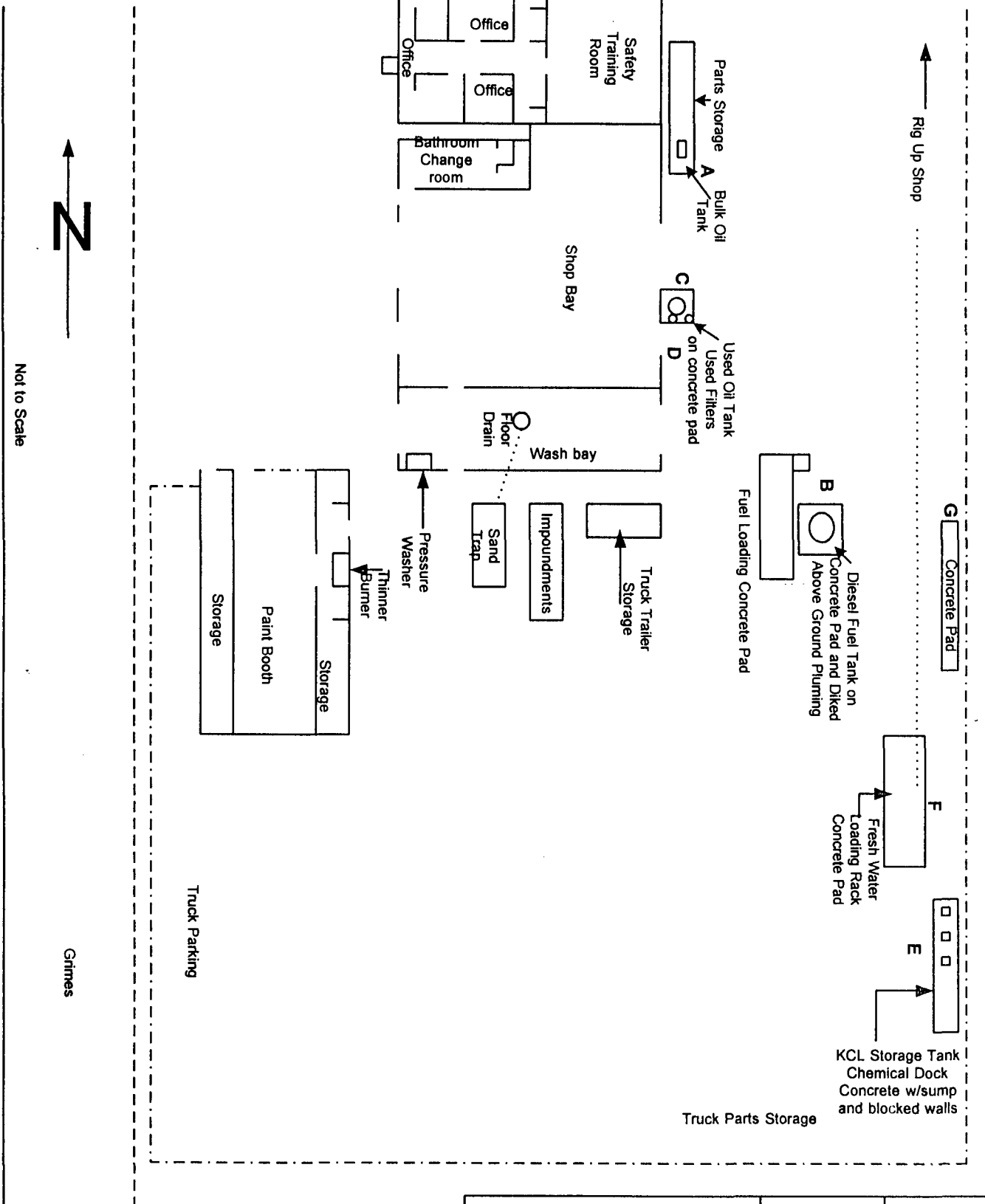
Top soil to 5'	Caliche 5' - 40'
Sand and shale 40' - 50'	water sand 50' - 150'
Anhydrite and lime 150'-290'	red bed 290'-450'

Composition of aquifer - sandstone

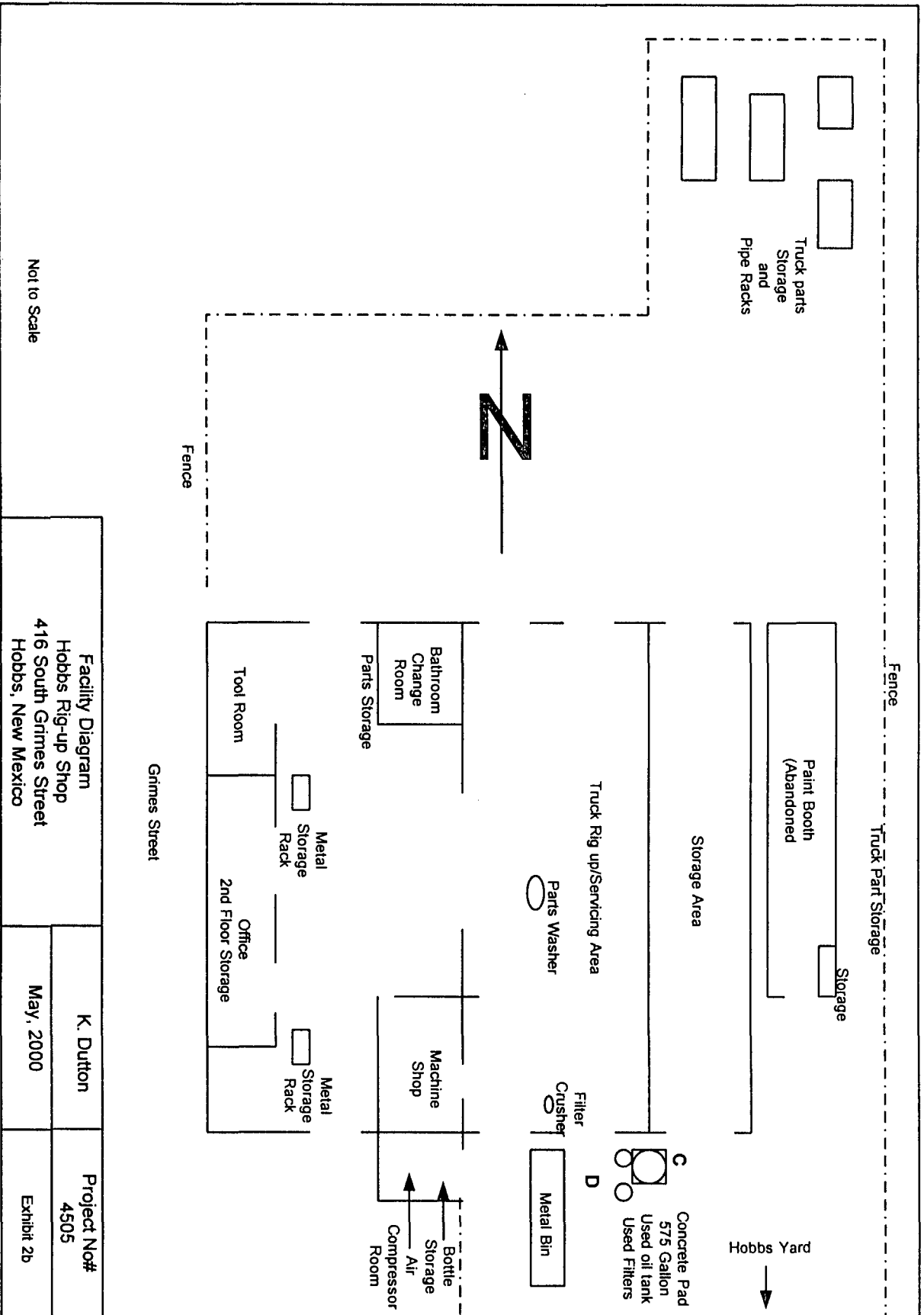
XIII. Other Information that Demonstrates Compliance with other OCD rules, Regulations and/or Orders

This facility does not have any current compliance issues.





Facility Diagram Hobbs Yard 418 S. Grimes St. Hobbs, New Mexico	K. Dutton	Project No# 4505
	May. 2000	Exhibit 2a



Facility Diagram Hobbs Rig-up Shop 416 South Grimes Street Hobbs, New Mexico	K. Dutton	Project No# 4505
	May, 2000	Exhibit 2b

[illegible]

Due to the amount of chemicals MSDS's will be
available at the yard.



Key Energy Services, Inc.

Key Energy Services, Inc.

BUSINESS EMERGENCY
CONTINGENCY PLAN

Hobbs Fluid Services Yard

418 South Grimes
Hobbs, New Mexico

Prepared by: Vision Technology, Inc.
June 2000

TABLE OF CONTENTS

	<u>Page</u>
Name of Facility	1
Type of Facility	1
Location of Facility	1
SIC Code	1
Name and Address of Owner/Operator	1
Designated Person Accountable for Oil Spill Prevention at Facility	1
Reportable Oil Spill Event	1
Spill Control Equipment (on site)	2
Spill Control Equipment (if needed)	2
Emergency Procedures	3
Emergency Response Agencies	4
Local Spill Containment Contractors	5
Materials Stored on Site	6

EXHIBITS

Exhibit 1	Location Map
Exhibit 2	Site Map

General Information

Name of Facility

Key Energy Services, Inc.

Type of Facility

Fluid services yard, maintenance of oil field servicing equipment

Location of Facility

418 South Grimes
Hobbs, New Mexico

SIC Code

1389

Name and Address of Owner/Operator

Yale E. Key, Inc.
DBA
Key Energy Services, Inc.
2625 E. Marland
Hobbs, New Mexico 88240
Telephone: (505) 393-9171

Designated Person Accountable for Oil Spill Prevention at Facility

Pete Turner, District Manager
Business Phone: (505) 397-4994
24-Hour Phone (505) 631-8995

Alternate

Bruce Baird
Business Phone: (505)397-4994
24-Hour Phone: (505)910-4138

Jerry Wolz
Business Phone: (505)397-4994
24-Hour Phone: (505) 910-4139

Reportable Oil Spill Event

There have been no known spill events at this yard from the time it was constructed.

Spill Control Equipment (On Site)

Absorbent

Fire Extinguishers and Blankets

Shovels, Rakes and Squeegee

Two-Way Radios

Cellular Telephones

Pagers

Spill Control Equipment (If Needed)

Vacuum Trucks	70-130 Barrel Capacity
Loaders	3-5 Cubic Yard Capacity
Excavators	
Dump Trucks	12-16 Cubic Yard Capacity
Bins	12-40 Cubic Yard Capacity
Motor Grader	
Bull Dozer	

Emergency Procedures

This Contingency plan was developed to address the general procedures to be followed in the event of a spill. The procedures to be followed will be determined by the size of the spill and the requirements of the applicable regulatory agencies.

A: Procedures to be followed in case of a spill:

1. The first employee that notices a spill will evaluate the situation and undertake the following steps in the order deemed most important:
 - a. Shut off the source, if possible without endangering themselves.
 - b. Contain the spill if possible.
 - c. Notify supervisor and describe the situation accurately. A list of Key Company personnel and their telephone numbers are included in this report.
 - d. Continue operations as directed
2. The supervisor will initiate action according to report received from the operating employee. He/She will make a personal assessment of the problem and take whatever additional steps he/she deems to be necessary.
3. When the supervisor is assured that all necessary steps have been taken to reduce the danger to the public and/or damage to the property and that sufficient people have been directed toward stopping the source and containing the spill, all appropriate company personnel and governmental agencies will be notified.
4. Continue containment/clean up operations.

B. Containment:

If a spill exceeds the capacity of the secondary containment structure of which occurs outside such structure. The following procedures will be implemented:

1. Additional containment basins, dikes, or diversionary structure will be constructed.
2. If insufficient equipment and personnel are available at the site, assistance will be requested from qualified contractors. A list of local spill containment contractors and equipment are included in this report.
3. Control of the spill can also be provided by the expeditious use of vacuum trucks and other removal methods.
4. Other clean up techniques will be used based on the requirements of the applicable federal, state, and local agencies.

Emergency Response Agencies

Hobbs

Emergency Fire and Medical	911
Lea County Oil Conservation Division (OCD)	(505) 393-6161
Lea County Environmental Department	(505) 397-9224
Hobbs Fire Department	(505) 397-9308
Hobbs Police Department	(505) 397-9265
Hobbs Emergency Management	(505) 393-9231

State of New Mexico

New Mexico State Police	(505) 392-5588
New Mexico Environmental Department	(505) 393-4302
NMOCD	(505) 827-7131

Federal

National Response Center	800 - 424- 8802
Poison Information Center	800 - 424 - 8802
EPA Region 6 Emergency Response Center	214 - 665 - 2222
Chemtrec	800 - 424 - 9300

Local Spill Containment Contractors

Vision Technology, Inc.
1943 N. Grimes Suite B
Hobbs, New Mexico 88241
915-553-7630

Safety & Environmental Solutions, Inc.
Hobbs, New Mexico
(505) 397-0510

[illegible]

EXHIBTS

EXHIBIT 1
LOCATION MAP

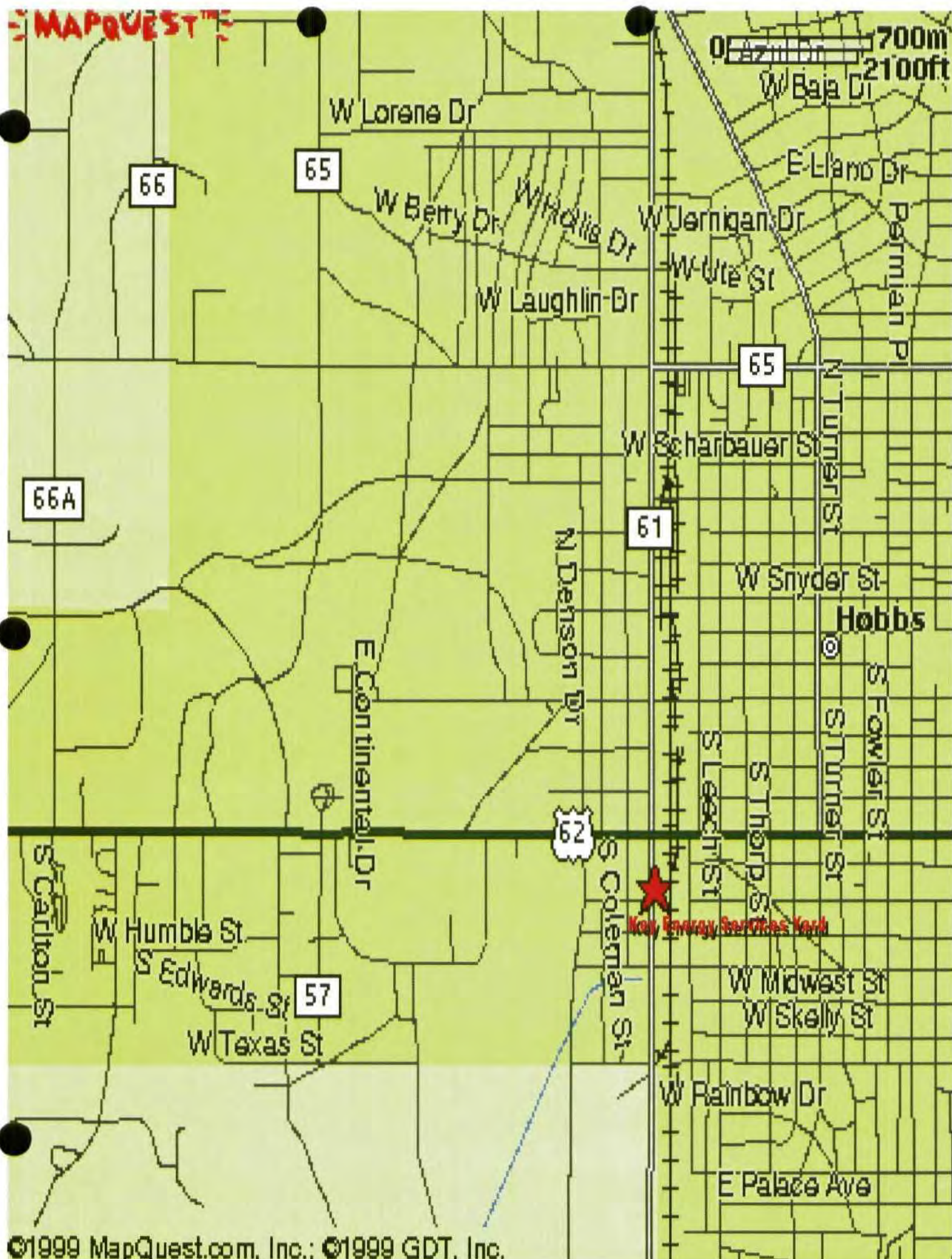
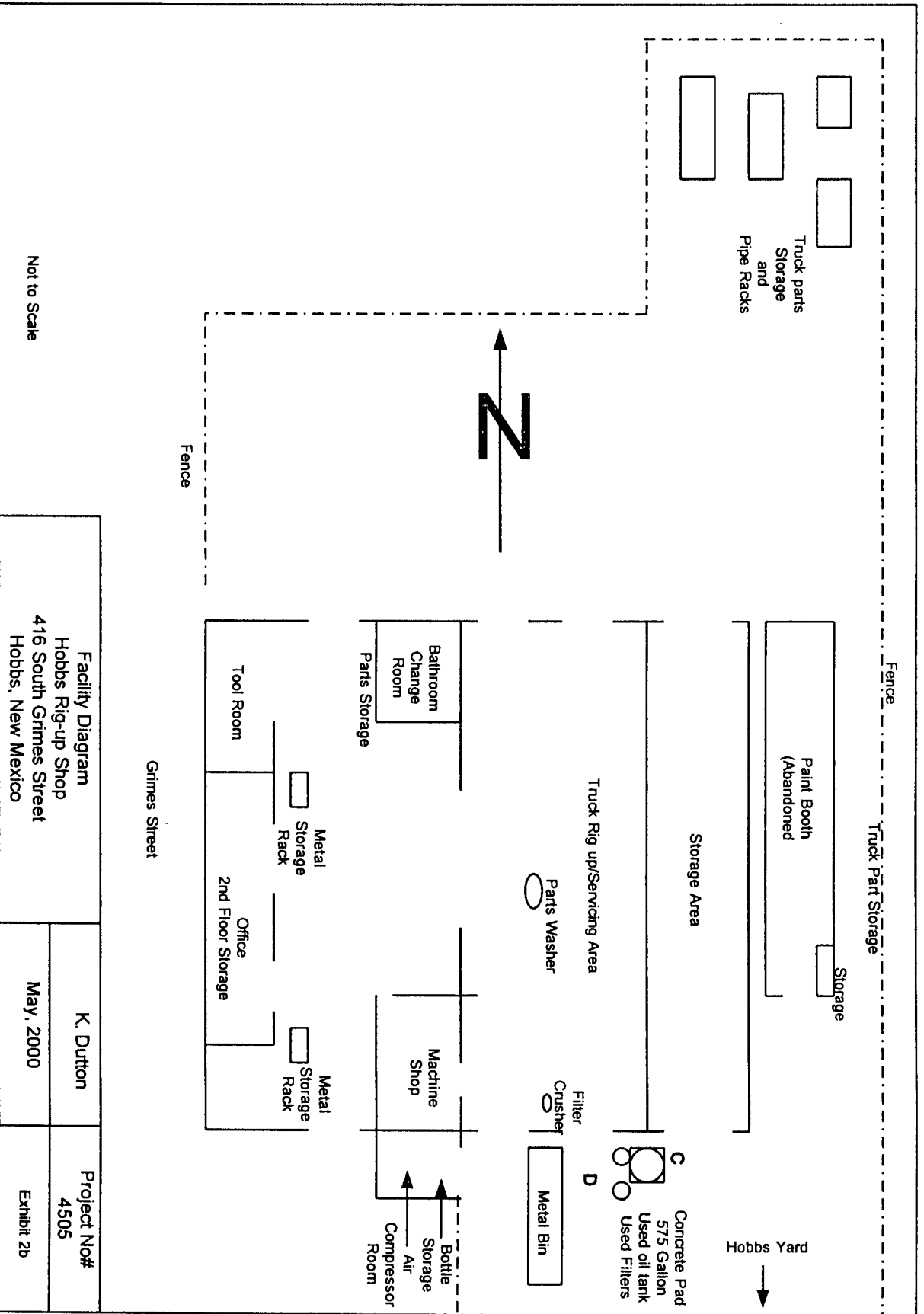
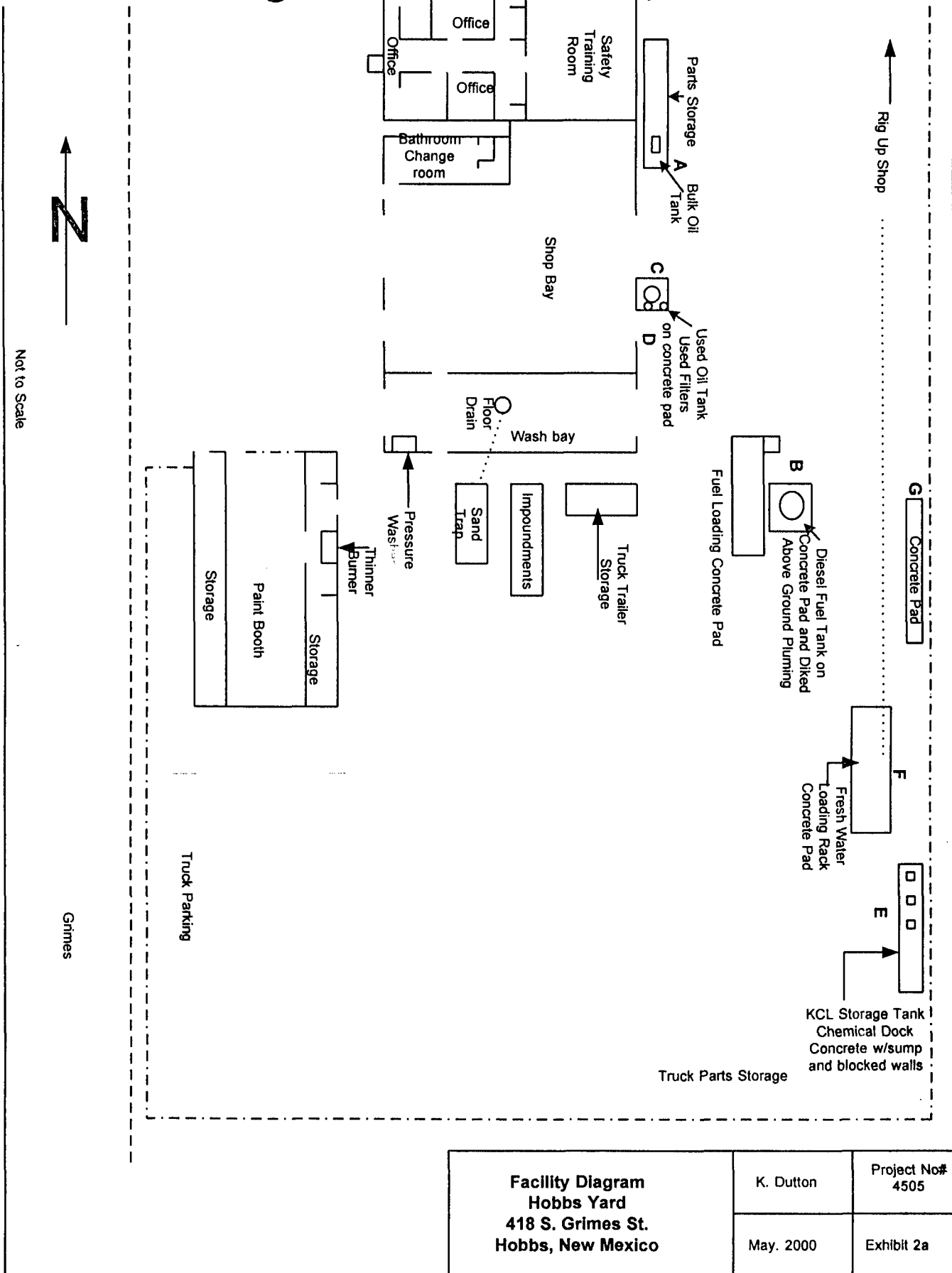


EXHIBIT 2
SITE MAP



Not to Scale

Facility Diagram Hobbs Rig-up Shop 416 South Grimes Street Hobbs, New Mexico		K. Dutton	Project No# 4505
		May, 2000	Exhibit 2b





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

May 12, 2000

Mr. Pete Turner
Key Energy Services Inc.
418 S. Grimes
Hobbs, NM 88240

Dear Mr. Turner:

Please find enclosed a copy of the recent inspection report conducted by OCD on May 11, 2000. OCD is requesting Key to address the deficiencies noted on the inspection report and report findings.

Please note Key failed to submit a discharge plan application 120 days before your discharge plan expiration date of July 26, 2000. Therefore, if the review time and public notice go past the expiration date Key will be in violation of the discharge plan. OCD encourages Key to submit the application as soon as possible so OCD may issue public notice and approve the permit before July 26, 2000.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Wayne Price-Pet", with a long horizontal stroke extending to the right.

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: OCD Hobbs Office

attachments-inspection report

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 5/11/00 Time: 10:06 AM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☐ Brine St. ☐ Oilfield Service Co. ☒
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐ _____

Discharge Plan: No ☐ Yes ☒ DP# _____

FACILITY NAME: HOBBS FLUID SERVICES YARD

PHYSICAL LOCATION: 418 S. GRIMES HOBBS

Legal: QTR _____ QTR _____ Sec _____ TS _____ R _____ County LEA

OWNER/OPERATOR (NAME) KEY ENERGY SERVICES INC.

Contact Person: PETE TURNER Tele:# 505-397-4994

MAILING

ADDRESS: S.A.B State _____ ZIP _____

Owner/Operator Rep's: S.A.B

OCD INSPECTORS: 2 PRICE / D. WILLIAMS

1. **Drum Storage:** 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.

- OK -

2. **Process Areas:** 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.

OK

3. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

NEED CONTAINMENT AROUND USED OIL TANKS.

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OK-

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

OK-

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All 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.

KEY TO INSPECT MAIN WASTEWATER SUMP AND FORWARD RESULTS TO OCD.

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. 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.

KEY TO PRESSURE TEST LINE BETWEEN WASH BAY AND MAIN SUMP. RESULTS TO BE FORWARD TO OCD.

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? Yes ☒ No ☐

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☒ NO ☐ IF NO DETAIL BELOW.

WASTE SOIL ON DRYING PAD NEEDS TO BE ADDRESSED.

9. Class V Wells: 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. All 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. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☒ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

Good

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

NO COMPLAINTS ISSUES

12. Does the facility have any other potential environmental concerns/issues?

NONE NOTED

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

14. ANY WATER WELLS ON SITE ? NO ☒ YES ☐ IF YES, HOW IS IT BEING USED ?

Miscellaneous Comments:

Number of Photos taken at this site: 6



Pic#1 Yard Entrance



Pic#4 Used oil tank and filter drums.



Pic#2 Waste soil on drying pad near main wastewater sump.



Pic#5 Rig-up shop used oil drain system.



Pic#3 Lube oil drums located east side of yard.



Pic#6 Rig-up shop used oil tank.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone X

Personal

E-Mail

Time: 1:30pm

Date: January 7, 2000

Originating Party: Wayne Price-OCD

Other Parties: Debra- For Pete Turner-Key Energy (Rowland)

Subject: Discharge Plan Renewal Notice for the following Facilities:

GW-200 Hobbs yard expires 07/26/2000

GW-___ Name expires

GW-___ Name expires

GW-___ Name expires

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with \$50.00 filing fee for the above listed facilities.

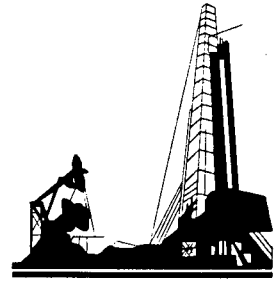
Conclusions or Agreements:

Signed: Wayne Price

CC: fax 505-393-9023

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, NM 87505
(505) 827-7133
Fax: (505) 827-8177



(PLEASE DELIVER THIS FAX)

To: PETE TURNER - KEY

From: OCD

Date: 1/07/2000

Number of Pages (Includes Cover Sheet) 2

Message: _____

If you have any trouble receiving this, please call:
(505) 827-7133

ROWLAND TRUCKING CO., INC.

ACCOUNT NO.		NMED NMED WATER QUALITY			CHECK NO:
VOUCHER	INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
60444	FILE FEE DISCHA 1018 L4, = 4, 533, T 185, R 38E	4/15/98	50.00	50.00	.00
CHECK TOTAL				50.00	

**ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH**

I hereby acknowledge receipt of check No. dated 4/16/98
 or cash received on in the amount of \$ 50.00
 from Rowland Trucking
 for Hobbs Facility BW-618
(Facility Name) (CF No.)
 Submitted by: Date:
 Submitted to ASD by: R. Clenden Date: 6/18/98
 Received in ASD by: Date:

Filing Fee XR New Facility Renewal
 Modification Other
(Optional)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment

ROWLAND TRUCKING CO., INC.
 P.O. BOX 340
 HOBBS, NM 88241
 (505) 397-0199

PNC BANK, NATIONAL ASSOCIATION
 PITTSBURGH, PA 15222
 60-162/433

CHECK NO.	CHECK DATE	VENDOR NO.
003142	04/16/98	NMED

PAY FIFTY AND 00/100 DOLLARS*****

CHECK AMOUNT
\$*****50.00

TO THE NMED WATER QUALITY
 ORDER MANAGEMENT
 OF

R. Clenden
 AUTHORIZED SIGNATURE

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 2/29/96
or cash received on in the amount of \$ 1380.00
from Rowland Trucking
for Hobbs GW-200

Submitted by: Date:

Submitted to ASD by: R. Anderson Date: 5/9/96

Received in ASD by: W. Ayala Date: 5-20-98

Filing Fee New Facility X Renewal

Modification Other

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment

ROWLAND TRUCKING CO., INC.

P.O. BOX 340
HOBBS, NM 88241
(505) 397-0199

UNITED NEW MEXICO BANK
AT LEA COUNTY

MAIN BRANCH
HOBBS, NM
95-199/1122

CHECK NO.	CHECK DATE	VENDOR NO.
011307	02/29/96	479

ONE THOUSAND THREE HUNDRED EIGHTY AND 00/100*****
DOLLARS*****

CHECK AMOUNT

*****1380.00

TO THE
ORDER
OF

NM ENERGY & MINERAL DEPT
OIL CONSERVATION DIVISION
P O BOX 6429
SANTA FE

NM 87505-6429

AUTHORIZED SIGNATURE

OIL CONSERVATION DIVISION

July 26, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-748

Mr. Pete Turner
Rowland Trucking Company, Inc.
P.O. Box 340
Hobbs, New Mexico 88240

RE: Discharge Plan GW-200 Approval
Hobbs Facility
Lea County, New Mexico

Dear Mr. Turner:

The discharge plan GW-200 for the Rowland Trucking Company, Inc., Hobbs Facility located in the NW/4 NW/4, Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application received June 20, 1995.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment.

Please 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.

Mr. Pete Turner

July 26, 1995

Page 2

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

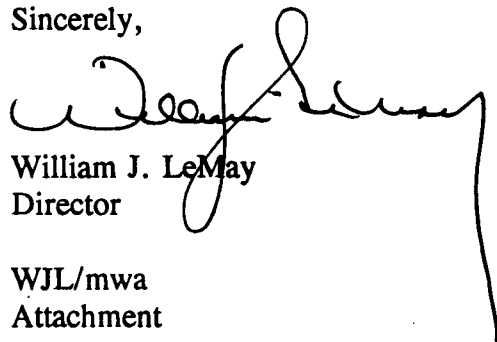
Pursuant to Section 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on July 26, 2000, and you should submit an application six months before this date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Rowland Trucking Company, Inc., Hobbs Facility is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars, due upon receipt of this approval, plus a flat fee of thirteen-hundred and eighty dollars (\$1,380.00) for oil and gas service companies. The New Mexico Oil Conservation Division (OCD) has not received your fifty (50) dollar filing fee or your flat fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

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

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,



William J. LeMay
Director

WJL/mwa
Attachment

xc: Jerry Sexton, OCD Hobbs Office
Wayne Price, OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-200 APPROVAL
ROWLAND TRUCKING COMPANY, INC.
HOBBS FACILITY
DISCHARGE PLAN REQUIREMENTS
(July 26, 1995)

1. Payment of Discharge Plan Fees: The fifty (50) dollar filing fee and the thirteen-hundred and eighty dollar (\$1,380.00) flat fee shall be submitted upon receipt of this approval. 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. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: All pre-existing single-lined sumps at this facility will be cleaned and visually inspected on an annual basis.

Any new or rebuilt sumps or below-grade tanks will incorporate leak detection in their designs and will be approved by the OCD prior to installation.
4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) times the capacity of the largest tank within the berm or one and one-third (1-1/3) times the total capacity of all interconnected tanks.
5. Above Grade Tanks: All above ground tanks (saddle tanks) will be on impermeable pad and curb type containment.
6. Pressure Testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and Hobbs District Offices pursuant to WQCC Rule 1-203 and OCD Rule 116.
8. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
9. Transfer or Ownership: Prior to the sale and/or a change in ownership of your facility, the OCD will be notified. A written request must be submitted and approved by the OCD prior to the transaction.

Z 765 962 748



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

ROWLAND TRUCKING COMPANY

PHONE
[505] 397-4994

418 SOUTH GRIMES
HOBBS, NEW MEXICO 88240

OIL CONSERVATION DIVISION
RECEIVED

PHONE
[505] 393-9023

1995 JUN 16 AM 8 52

June 14, 1995

Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

ATTN: Environmental Division
Mr. Mark Ashley

RECEIVED
JUN 20 1995
E. Environmental Bureau
Oil Conservation Division


Dear Sir:

Please find an enclosed supplement to our Discharge Plan Application which you recently received.

This supplement provides you with additional information as you requested. If we can be of any further assistance, please let me know.

Very truly yours,

ROWLAND TRUCKING COMPANY, INC.


Pete M. Turner
Manager

PTM/lg

SUPPLEMENT

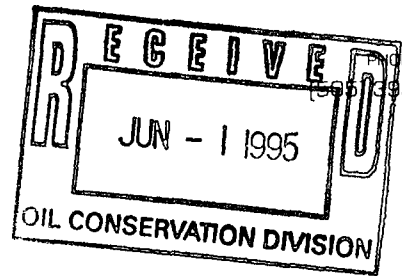
XII GEOLOGICAL/HYDROLOGICAL EVIDENCE

1. No bodies of water, streams, canals or other water courses are located within one mile of the facility. Water wells within the general area are domestic.
2. Total depth to the ground water is approximately 50 feet. This water is a water source for the City of Hobbs and is potable with a total dissolved solids of 100 mg/l.
3. Soil type:
 - Top soil to 5'
 - Caliche 5'-40'
 - Sand and shale 40'-50'
 - Water sand 50'-150'
 - Anhydrite and lime 150'-290'
 - Red bed 290'-450'
- 3a Name of aquifer - "Ogallala"
- 3b Composition of aquifer - sandstone
- 3c Depth to rock at base of alluvium
 - water sand 50'-150'
 - red bed at 290'

ROWLAND TRUCKING COMPANY

PHONE
(505) 397-4994

418 SOUTH GRIMES
HOBBS, NEW MEXICO 88240



OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505

GW-200

ATTN: ENVIRONMENTAL DIVISION
Mr. Mark Ashley

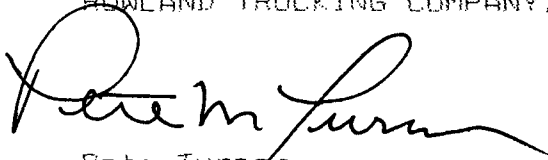
Dear Sir:

Please find our application for an Oilfield Service Facilities - Discharge Plan enclosed. I hope this will meet with your approval.

If we can be of any further assistance, please call at anytime. Our filing fee of fifty dollars (\$50) is attached as directed.

Very truly yours,

ROWLAND TRUCKING COMPANY, INC.


Pete Turner
Manager

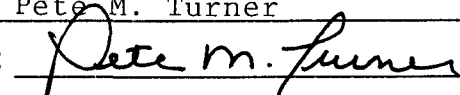
pt/lg

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES

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

- I. TYPE: Oil & Gas Service Company
- II. OPERATOR: Rowland Trucking Company, Inc.
ADDRESS: P O Box 340, Hobbs, New Mexico 88240
CONTACT PERSON: Pete M. Turner PHONE: 397-4994
- III. LOCATION: NW/4 NW/4 Section 3 Township 19S Range 38E
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility. See exhibit 2a and 2b
- VI. Attach a description of all materials stored or used at the facility. Exhibit 3
- VII. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- VIII. Attach a description of current liquid and solid waste collection/treatment/disposal procedures
- IX. Attach a description of proposed modifications to existing collection/treatment/disposal systems
- X. Attach a routine inspection and maintenance plan to ensure permit compliance.
- XI. Attach a contingency plan for reporting and clean-up of spills or releases.
- XII. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XIII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIV. CERTIFICATION
I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Pete M. Turner Title: Manager
Signature:  Date: 12 May 95

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S PACHECO
SANTA FE, NM 87505

DISCHARGE PLAN APPLICATION

ROWLAND TRUCKING COMPANY, INC.
418 South Grimes
Hobbs, NM 88240

I TYPE OF OPERATION

Oil & gas service company that provides transportation of fluids, used in, or in connection with, the discovery, development, production, refining, processing and or storage of natural gas and petroleum, and their products and by-products.

II NAME OF OPERATOR

Rowland Trucking Company, Inc.
418 South Grimes
Hobbs, NM 88240
(505) 397-4994
Pete M. Turner, Manager

III LOCATION OF DISCHARGE PLAN

NW/4 NW/4 SEC 3 T 19S R38E Lea County, New Mexico
400 Block South Grimes
Hobbs, New Mexico
(Exhibit 1 - Facility Site Plan)

IV LAND OWNERS

Rowland Trucking Company, Inc.
PO Box 340
Hobbs, NM 88241

V FACILITY DESCRIPTION

(Exhibits 2a and 2b)

VI MATERIALS STORED OR USED AT THE FACILITY

1. Drilling Fluids - None
2. Brine (KCL, NACL, etc.) See Exhibit III
3. Acids/Caustics - None
4. Detergents/Soaps - See Exhibit III
5. Solvents/Degreasers - See Exhibit III
6. Paraffin Treatment/Emulsion Breakers - See Exhibit III
7. Biocides - None
8. Others (See Exhibit 3)

VII SOURCES AND ESTIMATED QUANTITIES OF WASTES

1. Truck wastes - All fluids hauled away from this terminal are off loaded at our customer's locations or work facilities. No waste generated.

2. Truck washing on the exterior of our vehicles is performed daily to remove every day grime, dirt, etc. Rowland does not rinse out tanks or product barrels at our facility!

3. Our equipment is cleaned with a high pressure washer, scrub brushes and soap. (Brown truck soap) (See Exhibit 3) Cleaning solvents are not used during vehicle washing procedures.

4. Solvents/Degreasers are not used in any of our trucking operations. Rowland owns a "ZEP" brand solvent type parts cleaner that is used in the Rig-up shop (See Exhibit 2b). This system recycles ZEP solvent (See Exhibit 3) through filters. After approximately two years of service, we have only added fluids due to evaporation. We have not disposed of any solvents during this time. All used filters have been stored in a drum marked used solvent filters.

5. Spent acids, caustics or completion fluids wastes are not generated at this facility.

6. Waste slop oil - not generated at this facility.

7. Waste lubrication and motor oils - engine oils which are drained during vehicle maintenance programs generate approximately 170 gallons per month. This oil is stored in tanks marked used motor oil only.

8. Used oil filters are drained for 24 hours into our waste motor oil tanks, then they are put into drums marked used oil filters only. After accumulating a full drum we then have them crushed at our own facility. (See Exhibit 2b). They are then placed into a drum marked crushed oil filters and are picked up by Industrial Service Corporation, PO Box 711, Slaton, Texas 79364.

9. Solids and sludge from tanks - are not generated at this facility.

10. Painting wastes - Painting of equipment is not performed at this facility. All equipment painting is contracted to outside companies - no waste generated.

11. Sewage - The only commingling of fluids to the domestic sewage system comes from our vehicle washbay. This fluid is used to wash road tar, dirt and grime caused by daily operations. Degreasers and solvents are not used during this operation. An estimated volume of 3,000 gallons per month of water is used for this purpose.

12. Other waste liquids - No waste generated.

13. Other waste solids - Empty drums and pails are picked up on a regular basis by the companies that sell the products to Rowland Trucking Company, Inc. We accumulate approximately eight drums prior to pickup.

VIII SUMMARY DESCRIPTION OF EXISTING LIQUID AND SOLIDS WASTE COLLECTION AND DISPOSAL.

1. Truck Wastes - No waste generated.

2. Truck, tank and drum washing - Only the exterior of tractor/trailer vehicles are washed at this facility. All fluids drain into a 1 1/2" floor drain and then directly into a concrete sand trap which collects the heavy sands. Fluids then pass through a 3" siphon in the concrete petitioned sump into another section of the trap which allows more settling time and provides trapping for skim oil. Waters then pass into the City of Hobbs sewage system. This sump and accumulated sludge were last inspected by the State of New Mexico Environment Department and the New Mexico Oil Conservation Division in the last quarter of 1994. Analytical results are on file covering fluids and sediments.

After approximately 1 1/2 - 2 years of service the sludge build-up in the traps is placed into plastic lined pits and approval is received from the Oil Conservation Division before removal to an approved disposal facility. Tanks or drums are not rinsed out at this facility.

3. Steam cleaning of parts equipment, tanks - vehicles are externally washed with a high pressure washer in the washbay (See Exhibit 2a).

4. Solvents/degreasers are not used for any vehicle cleaning. A parts cleaner used at the Rig-up shop has never had any solvent disposal. It uses recycling filters that when replaced are put into drums marked used solvent filters.

5. Spent acids, caustics or completion fluids are not generated at this facility.

6. Waste slop oil is not generated at this facility.

7. Waste motor oils are stored in enclosed 575 gallon metal tanks located on concrete pads (See Exhibit 2a and 2b). This waste oil is then transported by Industrial Service Corporation, PO Box 711, Slaton, Texas 79364, by periodical pick-ups. All hauls are put on a uniform hazardous waste manifest prior to removal.

8. Oil filters are stored in enclosed metal drums sitting on concrete pads prior to crushing.

9. Solids and sludge from tanks - not generated at this facility.

10. Painting wastes - not generated at this facility.

11. Sewage - all sewage flows to the City of Hobbs sewage system.

12. Other waste liquids - not generated at this facility.

13. Other wastes - sediment from the sand trap of our washbay is stored on plastic lined above ground impoundment pits until approval is received from the OCD for disposal.

IX PROPOSED MODIFICATIONS

All drummed chemical storage will be on the concrete pad area that has containment walls and a sump to catch any accidental spills. (See Exhibit 2a)

X ROUTINE INSPECTION AND MAINTENANCE PLAN

Visual checks are made daily by drivers and supervisory personnel. A facility safety/environmental inspection checklist is made on a monthly basis. (See Exhibit 4)

XI CONTINGENCY PLAN FOR REPORTING AND CLEAN-UP OF SPILLS OR RELEASES

Spill reporting form (See Exhibit 5)

Emergency phone numbers - local response personnel (See Exhibits 6a and 6b)

XII GEOLOGICAL/HYDROLOGICAL EVIDENCE

Demonstrating that disposal of oilfield wastes will not adversely impact freshwater has not been prepared because disposals are not made at this facility!

XIII OTHER INFORMATION THAT DEMONSTRATES COMPLIANCE WITH OTHER OCD RULES, REGULATIONS AND/OR ORDERS.

1. All hydrocarbon transportation such as tank cleanings are permitted on OCD form C-117a. (See exhibit 8)
2. Movement of washbay sediment to approved disposal facilities letters of request to NMOCD. (See Exhibits 9a and 9b)
3. NMOCD letter of approval for washbay sediment removal. (See Exhibit 10)
4. Movement of non-regulated materials to disposal facilities are performed only after contacting Mr. Wayne Price, NMOCD, for verbal approval and designated disposal site.

OIL AND GAS SERVICE COMPANY

DISCHARGE PLAN APPLICATION

EXHIBIT INDEX

- 1 FACILITY SITE PLAN MAP - Facility location
- 2a FACILITY DESCRIPTION - DIAGRAM
South half - trucking yard
- 2b North half - Rig-up shop
- 3a PRODUCT - QUANTITIES - LOCATION
- 3b PRODUCT - QUANTITIES - LOCATION
- 3c MSDS - INFORMATION
- 4 FACILITY INSPECTION CHECKLIST
- 5a REPORTING AND CLEAN-UP - Spill report
- 5b EMERGENCY TELEPHONE CALL NUMBERS
- 6a ROWLAND EMERGENCY RESPONSE TO LOCAL AUTHORITIES
- 6b CITY OF HOBBS RESPONSE TO ROWLAND LETTER
- 7 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SPCC Compliance Inspection Letter
- 8 NMOCDC FORM C-117A
- 9a LETTERS OF REQUEST FOR WASHBAY SEDIMENT REMOVAL 1992
- 9b LETTERS OF REQUEST FOR WASHBAY SEDIMENT REMOVAL 1994
- 10 NMOCDC LETTER OF APPROVAL FOR WASHBAY SEDIMENT

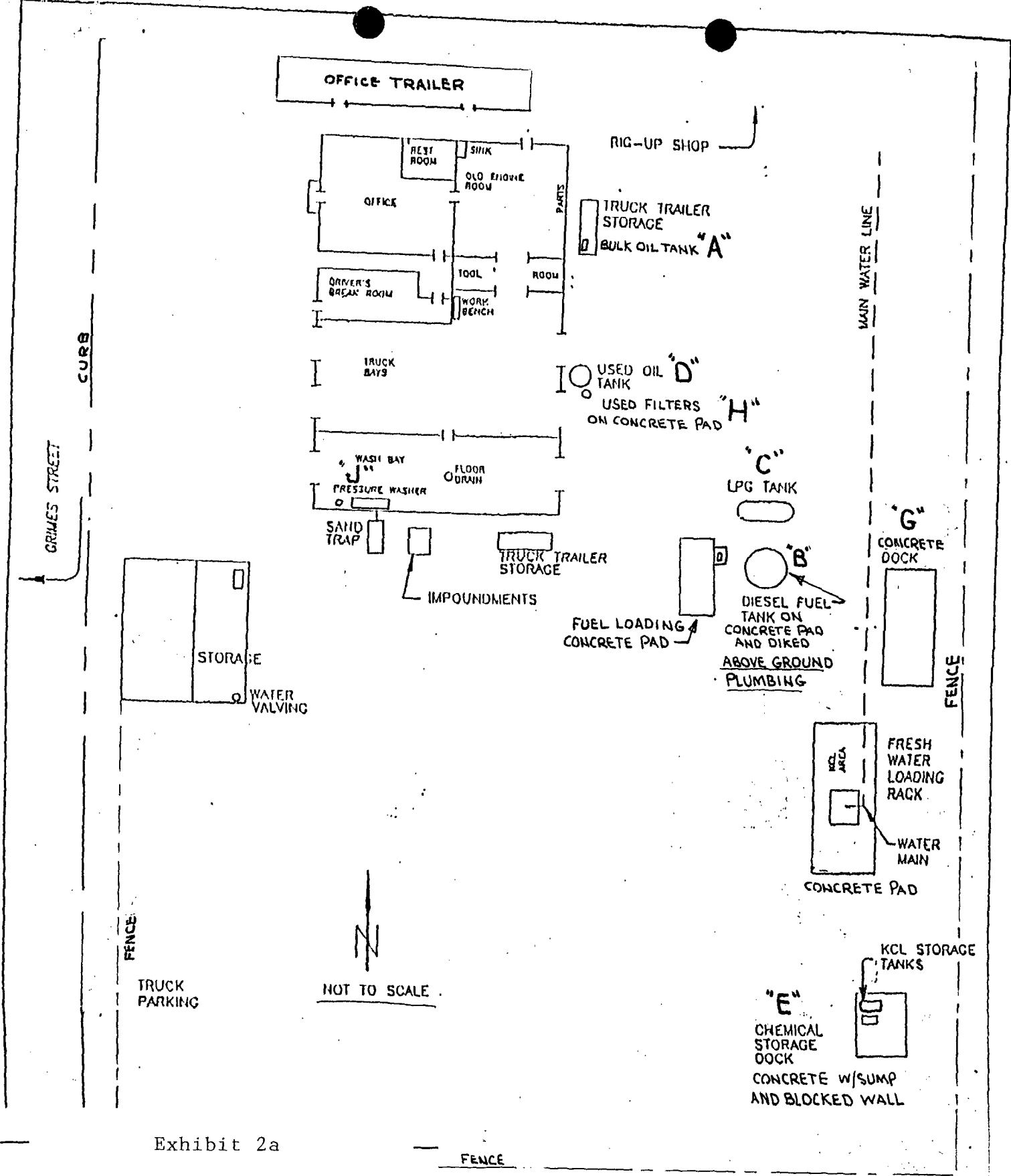
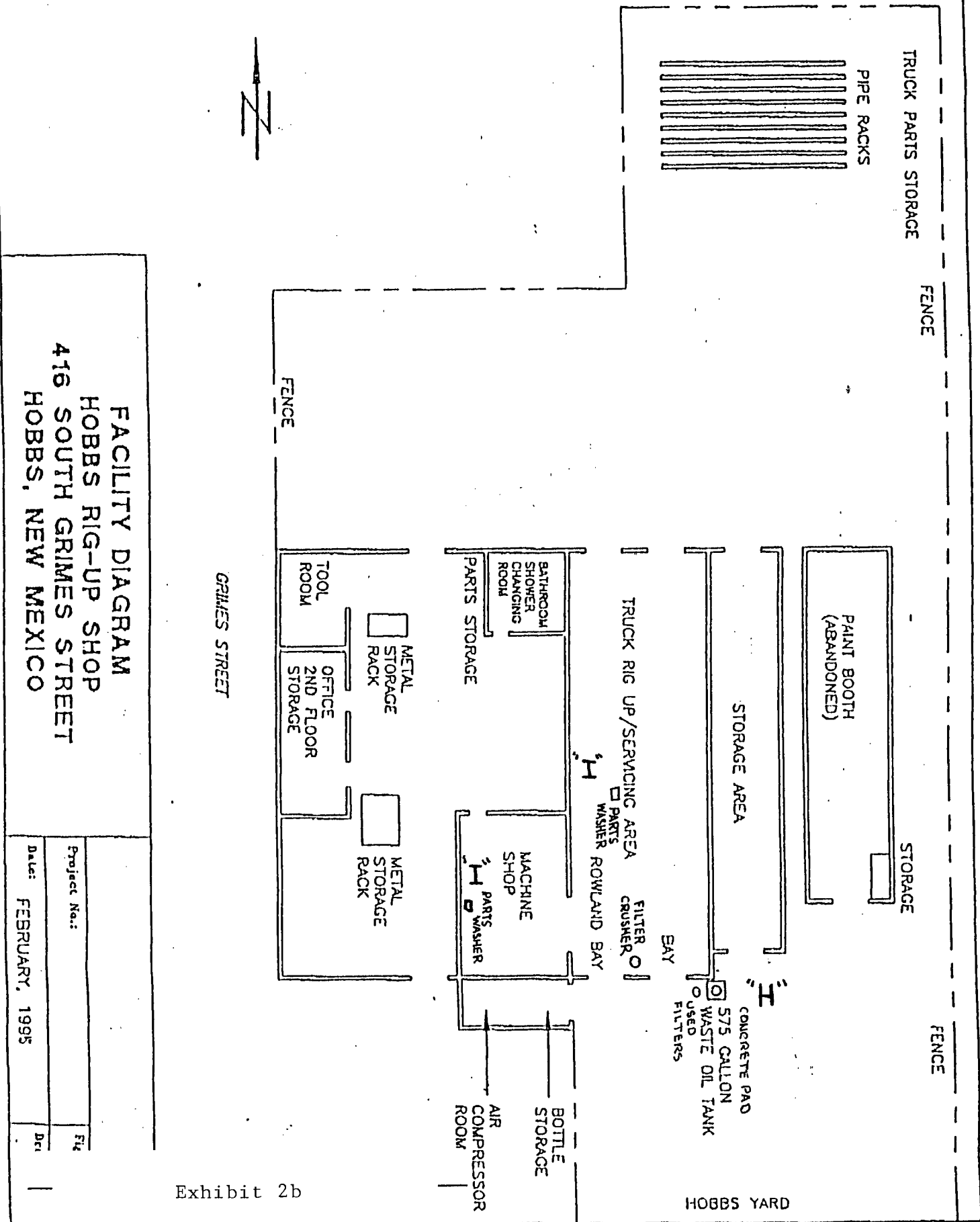


Exhibit 2a

**FACILITY DIAGRAM
HOBBS YARD
418 S. GRIMES ST.
HOBBS, NEW MEXICO**

Project No.:	Designed By:	Figure No.:
Date: March, 1995		Drawing No.



GRIMES STREET

FACILITY DIAGRAM
HOBBS RIG-UP SHOP
416 SOUTH GRIMES STREET
HOBBS, NEW MEXICO

Project No.:	Fig
Date: FEBRUARY, 1995	Det

Exhibit 2b

ROWLAND TRUCKING CO., INC.
 418 SOUTH GRIMES
 HOBBS, NM 88240
 (505)397-4494 24 HR. PHONE

EMERGENCY CONTACT
 PETE TURNER
 BRUCE BAIRD

PRODUCT NAME	MAX AMT GALLONS	AVG AMT GALLONS	DAYS ON SITE	CONTAINER TYPE	LOCATION ID BY MAP
CHEVRON MOTOR OIL DELO-400	250	125	365	STEEL	A
DIESEL MOTOR FUEL	10,500	3,000	365	BERMED/ STEEL	B
PROPANE	2,000	1,000	365	STEEL	C
USED OIL TANKS	1,150	250	365	STEEL	D
USED OIL FILTERS	110	55	365	STEEL	H
UNICHEM					
TS-253	55	25	365	STEEL	E
TS-270	55	25	365	STEEL	E
TH-370	55	25	365	STEEL	E
TC-420	55	25	365	STEEL	E
TH-606	55	25	365	STEEL	E
TB-100	55	25	365	STEEL	E
CHAMPION					
DP-61	30	15	365	PLASTIC	E
GYPTRON-133	275	110	365	PLASTIC	E

CON'T PG

PRODUCT NAME	MAX AMT GALLONS	AVG AMT GALLONS	DAYS ON SITE	CONTAINER TYPE	LOCATION ID BY MAP
TRETOLITE					
DMO-0046	55	25	365	METAL	E
WELLAID-212	55	25	365	PLASTIC	E
WELLAID-840	55	25	365	PLASTIC	E
FRAC TECH					
CLAY TROL (KCL)	165	55	365	FIBERGLASS	E
WESKEM					
NEUTRA-CLA (KCL)	165	55	365	FIBERGLASS	E
AGRI-EMPRESA					
KCL	17,000#	8,000#	365	BAGS BULK	G
ZEP					
DYNA-143	40	30	365	STEEL	I
ECCO					
BROWN TRUCK WASH	40#	20#	365	CARDBOARD	J



MATERIAL SAFETY DATA SHEET

"Essentially Similar" to Form OSHA-20

Date Prepared June 23, 1987

Supersedes Previous Sheet Dated NEW

I PRODUCT IDENTIFICATION

UNICHEM INTERNATIONAL
707 N. Leech / P. O. Box 1499 / Hobbs, New Mexico 88240

EMERGENCY TELEPHONE NO.
(505) 393-7751

PRODUCT NAME TECHNI-SPERSE 253

TRADE NAME: PARAFFIN CHEMICAL

CHEMICAL DESCRIPTION: Proprietary blend of surfactants

II HAZARDOUS INGREDIENTS

MATERIAL

Contains Methanol

TLV (UNITS)

8 hr. TWA 200 ppm (Skin)
or 260 mg/m³

III PHYSICAL DATA

OILING POINT, 760 mm Hg	N/D	FREEZING POINT:	-32°F
SPECIFIC GRAVITY (H ₂ O=1)	.95	VAPOR PRESSURE @	N/D
VAPOR DENSITY (AIR=1)	N/D	SOLUBILITY IN WATER	Soluble
PERCENT VOLATILES BY WEIGHT	N/D	EVAPORATION RATE	N/D

APPEARANCE AND ODOR

Slightly Milky, alcohol odor

IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT
(TEST METHOD) 84°F (TCC)

FLAMMABLE LIMITS IN AIR, % BY VOLUME ^{for} Methanol	LOWER	6.0	UPPER	36.5
---	-------	-----	-------	------

EXTINGUISHING MEDIA CO₂, dry chemical, alcohol foam, and water mist or fog. Use a blanketing effect to smother fire.

SPECIAL FIRE FIGHTING PROCEDURES Fire fighters should wear self-contained breathing apparatus and full protective clothing.

UNUSUAL FIRE AND EXPLOSION HAZARDS Moderate to low explosion hazard and dangerous fire hazard when exposed to heat, sparks, or flames and can react vigorously with oxidizing agents.

Liability is expressly disclaimed for any loss or injury arising out of the use of this information or the use of any materials designated.

* N/D - Not Determined

V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	200 ppm (Skin) or 260 mg/m ³ for Methanol
EFFECTS OF OVEREXPOSURE	Symptoms of overexposure include dizziness, visual impairment, nausea, respiratory failure, muscular incoordination and narcosis. Prolonged or repeated skin contact will cause dermatitis, erythema, and scaling. Ingestion could cause blindness or death.
EMERGENCY AND FIRST AID PROCEDURES	SKIN: Remove contaminated clothing. Wash affected areas with soap and water. EYES: Irrigate with running water for 15 min. Get medical help. INHALATION: Remove to fresh air and restore or support breathing if necessary. INGESTION: Drink Milk, water or sodium bicarbonate solution. Induce vomiting if victim is conscious.

VI REACTIVITY DATA

STABILITY		CONDITIONS TO AVOID	NONE
UNSTABLE	STABLE		
	XXXXXXX		
INCOMPATIBILITY (MATERIALS TO AVOID)	Avoid strong oxidizing agents such as nitrates, perchlorates, or sulfuric acid.		
HAZARDOUS DECOMPOSITION PRODUCTS	Oxides of carbon and nitrogen		
HAZARDOUS POLYMERIZATION MAY OCCUR	WILL NOT OCCUR	CONDITIONS TO AVOID	NONE
	XXXXXXX		

VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED	Remove all sources of ignition, provide adequate ventilation. Absorb on vermiculite, paper or other absorbent. Burn in an approved incinerator. Spills may be diluted and flushed to ground with water spray. Do not flush to sewer.
WASTE DISPOSAL METHOD	Dispose via a licensed waste disposal company. Follow Federal, State and local regulations.

VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE)	Air supplied or self-contained breathing apparatus above TLV and below 2000 ppm. A full face piece is required above 10,000 ppm.		
VENTILATION	LOCAL EXHAUST	Exhaust ventilation with 100cfm where vapor exposure is likely.	Engineering controls should be sparkproof and explosion proof.
	MECHANICAL (GENERAL)	As need to meet TLV requirements.	
PROTECTIVE GLOVES	Rubber gloves	EYE PROTECTION	Safety glasses or goggles and/or face shield where splash is possible.
OTHER PROTECTIVE EQUIPMENT	Eye wash stations and safety showers should be available in areas of use.		

IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	No smoking in areas of use. Store in well ventilated, low fire-risk area. Away from sources of heat, open flame and ignition. Ground and electrically interconnect containers for transfer.
OTHER PRECAUTIONS	Avoid prolonged or repeated breathing of vapors or contact with skin. Do not ingest.



MATERIAL SAFETY DATA SHEET

"Essentially Similar" to Form OSHA-20

Date Prepared January 19, 1987

Supersedes Previous Sheet Dated June 13, 1986

I PRODUCT IDENTIFICATION

UNICHEM INTERNATIONAL
707 N. Leech / P. O. Box 1499 / Hobbs, New Mexico 88240

EMERGENCY TELEPHONE NO.
(505) 393-7751

PRODUCT NAME Techni-Sperse 270

TRADE NAME: Paraffin Chemical

CHEMICAL DESCRIPTION:

Proprietary blend of solvents and dispersants

II HAZARDOUS INGREDIENTS

MATERIAL	TLV (UNITS)
Contains Xylene	8 hr. TW 100 ppm recommended
Reportable Quantity (RQ) (CERCLA) 283 gallons	

III PHYSICAL DATA

BOILING POINT, 760 mm Hg	N/D	FREEZING POINT:	-40°F
SPECIFIC GRAVITY (H ₂ O=1)	.89	VAPOR PRESSURE @	N/D
VAPOR DENSITY (AIR=1)	N/D	SOLUBILITY IN WATER	Dispersible
PERCENT VOLATILES BY WEIGHT	N/D	EVAPORATION RATE	N/D

APPEARANCE AND ODOR Clear yellow liquid, solvent odor

IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT
(TEST METHOD)

78°D (TCC)

FLAMMABLE LIMITS IN AIR, % BY VOLUME

LOWER

N/D

UPPER

N/D

EXTINGUISHING MEDIA

Foam, dry chemical, CO₂, water spray or fog. Use a water spray to cool fire-exposed containers.

SPECIAL FIRE FIGHTING PROCEDURES

Use self-contained breathing equipment for enclosed areas in a fire situation.

UNUSUAL FIRE AND EXPLOSION HAZARDS

Vapors can flow along surfaces to distant ignition sources and flash back.

Liability is expressly disclaimed for any loss or injury arising out of the use of this information or the use of any materials designated.

N/D - Not Determined

V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	TLV 100 ppm (estimated--not established by ACGIH or OSHA)
EFFECTS OF OVEREXPOSURE	Inhalation of high vapor, concentrations may have results ranging from mild depression to convulsions and loss of consciousness. Concentrations over 100 ppm may cause dizziness, nausea and headache. Prolonged or repeated skin contact is irritating and will cause defatting and dermatitis. Eye contact may cause burning and irritation. Aspiration can be a hazard if material is swallowed.
EMERGENCY AND FIRST AID PROCEDURES	SKIN: Remove contaminated clothing; wash with soap and water. EYES: Flush eyes with lots of running water. INHALATION: Remove to fresh air. INGESTION: Do not induce vomiting. Give white mineral oil or edible oil. Call a physician.

VI REACTIVITY DATA

STABILITY		CONDITIONS TO AVOID	NONE
UNSTABLE	STABLE		
	XXXXXXXXXX		
INCOMPATIBILITY (MATERIALS TO AVOID)	Avoid oxidizing agents.		
HAZARDOUS DECOMPOSITION PRODUCTS	Toxic fumes and gases including oxides and carbon and nitrogen.		
HAZARDOUS POLYMERIZATION MAY OCCUR	WILL NOT OCCUR	CONDITIONS TO AVOID	NONE
	XXXXXXXXXX		

VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED	Remove all sources of ignition. Provide adequate ventilation. Contain and recover free liquid. Use vermiculite, sand, etc. to absorb residue or small spill. Scrape up and place in covered metal container. Prevent liquid from entering sewer or water course.
WASTE DISPOSAL METHOD	Dispose of by incineration or by depositing in an approved landfill under controlled conditions. Follow all Federal, State and local regulation.

VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE)	Use respirators with organic solvent type canisters for short periods of non-routine work at 100-2000 ppm. Use self-contained breathing apparatus for higher or unknown vapor concentrations.			
VENTILATION	LOCAL EXHAUST	As need to meet TLV requirements	SPECIAL	100 fpm face velocity for exhaust hoods.
	MECHANICAL (GENERAL)	As needed to meet TLV requirements.	OTHER	
PROTECTIVE GLOVES	Buna-N rubber gloves and apron to prevent contact.		EYE PROTECTION	Safety glasses or goggles and/or face shield.
OTHER PROTECTIVE EQUIPMENT	Eye wash stations should be readily accessible.			

IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	Store containers in clean, cool, well ventilated, low fire risk area away from oxidizing agents and ignition sources. Ground and electrically interconnect metal containers when dispensing. Use safety cans for small amounts.
OTHER PRECAUTIONS	



UNICHEM
INTERNATIONAL

MATERIAL SAFETY DATA SHEET

"Essentially Similar" to Form OSHA-20

Date Prepared January 19, 1987

Supersedes Previous Sheet Dated June 16, 1986

I PRODUCT IDENTIFICATION

UNICHEM INTERNATIONAL
707 N. Leech / P. O. Box 1499 / Hobbs, New Mexico 88240

EMERGENCY TELEPHONE NO.
(505) 393-7751

PRODUCT NAME **TECHNI-CLEAN 420 & 420W**

TRADE NAME: **Surfactant**

CHEMICAL DESCRIPTION: **Proprietary blend of water soluble surfactants**

II HAZARDOUS INGREDIENTS

MATERIAL	TLV (UNITS)
Contains Methanol (combustable) 8.211/pg. Reportable Quantity (RQ) (CERCLA) 3,045 gallons	8 hr. TWA 100 ppm recommended

	420	420W	PHYSICAL DATA	420	420W
BOILING POINT, 760 mm Hg	N/D	N/D	FREEZING POINT:	0°F	-40°F
SPECIFIC GRAVITY (H ₂ O=1)	.99	.96	VAPOR PRESSURE @	N/D	N/D
VAPOR DENSITY (AIR=1)	N/D	N/D	SOLUBILITY IN WATER	Soluble	
PERCENT VOLATILES BY WEIGHT	N/D	N/D	EVAPORATION RATE	N/D	N/D

APPEARANCE AND ODOR **Amber liquid, alcohol odor**

IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (TEST METHOD)	TC-420 TC-420W	107°F (TCC) 90° (TCC)				
FLAMMABLE LIMITS IN AIR, % BY VOLUME		LOWER	N/D	UPPER	N/D	
EXTINGUISHING MEDIA	Foam, dry chemical, CO ₂ , water spray or fog. Use a water spray to cool fire-exposed containers.					
SPECIAL FIRE FIGHTING PROCEDURES	Use self-contained breaching equipment for enclosed areas in a fire situation.					
UNUSUAL FIRE AND EXPLOSION HAZARDS	Vapors can flow along surfaces to distant ignition sources and flash back.					

Liability is expressly disclaimed for any loss or injury arising out of the use of this information or the use of any materials designated.

*N/D - Not Determined

V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	TLV 100 ppm (estimated--not established by ACGIH or OSHA)
EFFECTS OF OVEREXPOSURE	Inhalation of high vapor, concentrations may have results ranging from mild depression to convulsions and loss of consciousness. Concentrations over 100 ppm may cause dizziness, nausea and headache. Prolonged or repeated skin contact is irritating and will cause defatting and dermatitis. Eye contact may cause burning and irritation. Aspiration can be a hazard if material is swallowed.
EMERGENCY AND FIRST AID PROCEDURES	SKIN: Remove contaminated clothing; wash with soap and water. EYES: Flush eyes with lots of running water. INHALATION: Remove to fresh air. INGESTION: Do not induce vomiting. Give white mineral oil or edible oil. Call a physician.

VI REACTIVITY DATA

STABILITY		CONDITIONS TO AVOID	NONE
UNSTABLE	STABLE		
	XXXXXXXXXX		
INCOMPATIBILITY (MATERIALS TO AVOID)		Avoid oxidizing agents.	
HAZARDOUS DECOMPOSITION PRODUCTS		Toxic fumes and gases including oxides and carbon and nitrogen.	
HAZARDOUS POLYMERIZATION MAY OCCUR		CONDITIONS TO AVOID	NONE
WILL NOT OCCUR	XXXXXXXXXX		

VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED	Remove all sources of ignition. Provide adequate ventilation. Contain and recover free liquid. Use vermiculite, sand, etc. to absorb residue or small spill. Scrape up and place in covered metal container. Prevent liquid from entering sewer or water course.
WASTE DISPOSAL METHOD	Dispose of by incineration or by depositing in an approved landfill under controlled conditions. Follow all Federal, State and local regulation.

VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE)		Use respirators with organic solvent type canisters for short periods of non-routine work at 100-2000 ppm. Use self-contained breathing apparatus for higher or unknown vapor concentrations.		
VENTILATION	LOCAL EXHAUST	As need to meet TLV requirements	SPECIAL	100 lfm face velocity for exhaust hoods.
	MECHANICAL (GENERAL)	As needed to meet TLV requirements.	OTHER	
PROTECTIVE GLOVES		Buna-N rubber gloves and apron to prevent contact.	EYE PROTECTION	Safety glasses or goggles and/or face shield.
OTHER PROTECTIVE EQUIPMENT		Eye wash stations should be readily accessible.		

IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	Store containers in clean, cool, well ventilated, low fire risk area away from oxidizing agents and ignition sources. Ground and electrically interconnect metal containers when dispensing. Use safety cans for small amounts.
OTHER PRECAUTIONS	



MATERIAL SAFETY DATA SHEET

"Essentially Similar" to Form OSHA-20

Date Prepared July 1, 1986

Supersedes Previous Sheet Dated June 18, 1986

I PRODUCT IDENTIFICATION

UNICHEM INTERNATIONAL
707 N. Leech / P. O. Box 1499 / Hobbs, New Mexico 88240

EMERGENCY TELEPHONE NO.
(505) 393-7751

PRODUCT NAME **TECHNI-BREAK 100**

TRADE NAME: **DEMULSIFIER**

CHEMICAL DESCRIPTION:

Proprietary blend of surfactants in aromatic solvent

II HAZARDOUS INGREDIENTS

MATERIAL
Aromatic solvent

Contains IPA

TLV (UNITS)
8 hr. TWA 100 ppm
recommended
8 hr. TWA 400 (skin)

III PHYSICAL DATA

BOILING POINT, 760 mm Hg	N/D	FREEZING POINT:	-40° F
SPECIFIC GRAVITY (H ₂ O=1)	.92	VAPOR PRESSURE @	N/D
VAPOR DENSITY (AIR=1)	N/D	SOLUBILITY IN WATER	Dispersible
PERCENT VOLATILES BY WEIGHT	N/D	EVAPORATION RATE	N/D

APPEARANCE AND ODOR **Dark Amber liquid, aromatic odor**

IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT
(TEST METHOD) **66° F (TCC)**

FLAMMABLE LIMITS IN AIR, % BY VOLUME	LOWER	N/A	UPPER	N/A
--------------------------------------	-------	-----	-------	-----

EXTINGUISHING MEDIA **Foam, dry chemical, CO₂, water spray or fog. Use a water spray to cool fire-exposed containers.**

SPECIAL FIRE FIGHTING PROCEDURES **Use self-contained breathing equipment for enclosed areas in a fire situation.**

UNUSUAL FIRE AND EXPLOSION HAZARDS **Vapors can flow along surfaces to distant ignition sources and flash back.**

Liability is expressly disclaimed for any loss or injury arising out of the use of this information or the use of any materials designated.

*N/D - Not Determined

V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	TLV 100ppm (estimated--not established by ACGIH or OSHA)
EFFECTS OF OVEREXPOSURE	Inhalation of high vapor concentrations may have results ranging from mild depression to convulsions and loss of consciousness. Concentrations over 100 ppm may cause dizziness, nausea, and headache. Prolonged or repeated skin contact is irritating and will cause defatting and dermatitis. Eye contact may cause burning and irritation. Aspiration can be a hazard if material is swallowed.
EMERGENCY AND FIRST AID PROCEDURES	Skin: Remove contaminated clothing; wash with soap and water. Eyes: Flush eyes with lots of running water. INHALATION: Remove to fresh air. restore breathing if necessary. Call a physician.

VI REACTIVITY DATA

STABILITY		CONDITIONS TO AVOID	NONE
UNSTABLE	STABLE		
	XXXXXXXXXX		
INCOMPATIBILITY (MATERIALS TO AVOID)		Avoid oxidizing agents	
HAZARDOUS DECOMPOSITION PRODUCTS		Toxic fumes and gases including oxides and carbon and nitrogen.	
HAZARDOUS POLYMERIZATION		CONDITIONS TO AVOID	NONE
MAY OCCUR	WILL NOT OCCUR		
	XXXXXXXXXXXXXX		

VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED	Remove all sources of ignition. Provide adequate ventilation. Contain and recover free liquid. Use vermiculite, sand, etc. to absorb residue or small spill. Scrape up and place in covered metal container. Prevent liquid from entering sewer or water course.
WASTE DISPOSAL METHOD	Dispose of by incineration or by depositing in an approved landfill under controlled conditions. Follow all Federal, State, and local regulations.

VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE)		Use respirators with organic solvent type canisters for short periods of nonroutine work at 100-200ppm. Use self-contained breathing apparatus for higher or unknown vapor concentrations.		
VENTILATION	LOCAL EXHAUST	As needed to meet TLV requirements	SPECIAL	100 lfm face velocity for exhaust hoods.
	MECHANICAL (GENERAL)	As needed to meet TLV requirements	OTHER	
PROTECTIVE GLOVES		Buna-N rubber gloves and apron to prevent contact.	EYE PROTECTION	safety glasses or goggles and/or face shield.
OTHER PROTECTIVE EQUIPMENT		Eye wash stations should be readily accessible.		

IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	Store containers in clean, cool, well-ventilated, low fire-risk area away from oxidizing agents and ignition sources. Ground and electrically connect metal containers when dispensing. Use safety cans for small amounts.
--	--

OTHER PRECAUTIONS



MATERIAL SAFETY DATA SHEET

PAGE 1

PETROLITE CORPORATION
369 MARSHALL AVE.
ST. LOUIS MO 63119 U.S.A

REVISION DATE: 07/22/93
EMERGENCY PHONE: 1-314-961-3500
CHEMTREC EMER NO: 1-800-424-9300

SECTION 1 PRODUCT IDENTIFICATION

PRODUCT: DMO0046F

TRADE NAME: TRETOLITE

LABEL: 004
000
000

(IF HAZARDOUS PER D.O.T. CFR TITLE 49)

SHIPPING NAME: Flammable liquid, n.o.s.

HAZARD CLASS: 3

ID#: UN1993

CHEMICAL DESCRIPTION

ALKYLARYL SULFONATES, OXYALKYLATED ALKYLPHENOLIC RESINS IN
AROMATIC HYDROCARBONS, METHANOL, AND 2-ETHYLHEXANOL

SECTION 2 HAZARDOUS INGREDIENTS

CAS NUMBER	MATERIAL	%	EXPOSURE LIMITS
64742-94-5	Heavy aromatic naphtha	30-60	RECOMMENDED: 25 ppm
**	Alkylaryl sulfonate	10-30	Not Established
**	Alkylaryl sulfonate	10-30	Not Established
00067-56-1	Methanol	1-5	ACGIH TLV: 200ppm TWA OSHA PEL: 200ppm TWA ACGIH STEL: 250 ppm
00104-76-7	2-Ethylhexanol	1-5	Not Established

**Specific chemical identity is being withheld for
confidential business purposes.
Claim for Canadian Exemption No. 1089-009 filed
February 8, 1989.

SECTION 3 PHYSICAL DATA

SPECIFIC GRAVITY(H2O = 1.0@60 F): 0.972
VAPOR PRESSURE: Not Established

VOLATILITY: Significant
SOL. IN WATER: Insoluble

APPEARANCE AND ODOR: Amber liquid. Aromatic odor.

SECTION 4 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 84 F

FLAMMABLE LIMITS: Not Established

CONTINUED ON PAGE: 2

CONTINUATION OF DMO0046F

FLASH METHOD:

SFCC ASTM D-3828

EXTINGUISHING MEDIA:

Use water spray or fog, alcohol-type foam, dry chemical or CO₂.

FIRE FIGHTING PROCEDURES:

Use a self-contained breathing apparatus with full facepiece operated in pressure-demand or other positive pressure mode. Flammable. Cool fire-exposed containers using water spray.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Flammable liquid, vapors of which can form an ignitable mixture with air. Vapors can flow along surfaces to distant ignition sources and flash back.

SECTION 5 HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE:

INHALATION:

Exposure may result in eye, nose and respiratory irritation, and may produce nausea, headache and dizziness. Prolonged exposures to elevated concentrations may cause weakness and CNS depression. In extreme cases, drowsiness and even loss of consciousness may occur.

SKIN AND EYE CONTACT:

Intermittent, brief skin contact may result in mild irritation. Prolonged contact with skin may cause moderate to severe irritation resulting in rashes and dermatitis. Contact with eyes will cause moderate to severe irritation, and may produce moderate but reversible eye injury.

INGESTION:

May cause severe gastrointestinal distress with nausea, vomiting and diarrhea. Aspiration into lungs may cause pulmonary edema and chemical pneumonitis. May be readily absorbed through the gastrointestinal tract.

ORAL LD50: 1.07 g/kg (Rat)

EMERGENCY AND FIRST AID PROCEDURES:

Wash skin thoroughly with soap and water. If rash or irritation develops, consult a physician. Launder clothing before reuse. If in eyes, irrigate with flowing water immediately and continuously for fifteen minutes. Consult a physician promptly.

CONTINUED ON PAGE: 3

CONTINUATION OF DMO0046F

If inhaled, remove to fresh air. Administer oxygen if necessary. Consult a physician if symptoms persist or exposure was severe.
Due to possible aspiration into the lungs, DO NOT induce vomiting if ingested. Consult a physician immediately.
NOTE TO PHYSICIAN: Administer activated carbon if indicated.

SECTION 6 REACTIVITY DATA

STABILITY: Stable under normal conditions of storage and use.

INCOMPATIBILITY: Keep away from strong oxidizing agents, heat and open flames.

HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of sulfur.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION 7 SPILL AND LEAK PROCEDURES

IF MATERIAL IS SPILLED OR RELEASED:
Small spill - Absorb on paper, cloth or other material.
Large spill - Dike to prevent entering any sewer or waterway. Transfer liquid to a holding container. Cover residue with dirt, or suitable chemical adsorbent. Use personal protective equipment as necessary.

DISPOSAL METHOD:
Place chemical residues and contaminated adsorbent materials into a suitable waste container and take to an approved hazardous waste disposal site. Dispose of all residues in accordance with applicable waste management regulations.

DECONTAMINATION PROCEDURES:
Not appropriate.

SECTION 8 SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION:
When concentrations exceed the exposure limits specified, use of a NIOSH-approved organic vapor cartridge respirator is recommended. Where the protection factor of the respirator may be exceeded, use of a self-contained breathing unit may be necessary.



MATERIAL SAFETY DATA SHEET

PAGE 4

CONTINUATION OF DMO0046F

VENTILATION:

General ventilation should be provided to maintain ambient concentrations below nuisance levels. Local ventilation of emission sources may be necessary to maintain ambient concentrations below recommended exposure limits.

PROTECTIVE CLOTHING:

Chemical-resistant gloves and chemical goggles should be used to prevent skin and eye contact.

SECTION 9 SPECIAL PRECAUTIONS

Flammable liquid. Avoid heat, sparks and open flames. Avoid breathing of vapors and contact with eyes, skin or clothing. Keep container closed when not in use. Hazardous product residue may remain in emptied container. Do not reuse empty containers without commercial cleaning or reconditioning.

Although the information and recommendations set forth herein are believed to be correct as of the date hereof, Petrolite makes no representations to the accuracy of such information and recommendations. It is the user's responsibility to determine the suitability and completeness of such information and recommendation for its own particular use. Petrolite shall not be responsible for any direct, indirect, incidental or consequential damages of whatsoever nature resulting from the publication, use of or reliance upon such information and recommendations.

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Store
COPY

139338
Roland

ECCO CHEMICALS, INC.
8505 DIRECTORS ROW • DALLAS, TX 75247
214-631-6885 • CHEMTREC (800) 424-9300

A-19
BROWN SOAP

Hazard Rating Key: 4 - Extreme, 3 - High
2 - Moderate, 1 - Slight, 0 - None
Based on NPCA Hazardous Materials
Identification System (HMIS)

* HEALTH 1 *
* FIRE 0 *
* REACTIVITY 0 *

MATERIAL SAFETY DATA SHEET

This MSDS complies with 29CFR 1910.1200 (The Hazard Communication Standard).

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: BROWN TRUCK SOAP A-19
GENERAL OR GENERIC ID: Alkaline Cleaner
FORMULA: Not Applicable
DOT HAZARD CLASSIFICATION: Not Applicable
EPA: Not Applicable
OSHA: Not Applicable

SECTION II - COMPONENTS

None as defined by OSHA 29 CFR 1910.1000, Tables Z1, Z2, Z3 29CFR 1910.1001-1047.

Not listed in NTP Third Annual Report on Carcinogens & Chemicals.

Not listed in ACGIH's Threshold Limit Values and Biological Exposure Indices for 1991-92.

Not listed in IARC Known and Probable Human Carcinogens.

Not listed in IARC Animal Carcinogens.

SECTION III - PHYSICAL DATA

PROPERTY

MEASUREMENT

BOILING POINT	Not Applicable
VAPOR PRESSURE	Not Applicable
SPECIFIC GRAVITY	Not Applicable
VOLATILE	Not Applicable
SOLUBILITY	Moderate
EVAPORATION RATE	Not Applicable
APPEARANCE	Brown Granular Powder
ODOR	None

ECCO CHEMICALS, INC.

SECTION IV - FIRE & EXPLOSIVE INFORMATION

FLASH POINT:	Not Flammable
EXPLOSIVE LIMITS:	Not Flammable
EXTINGUISHING MEDIA:	Not Applicable
SPECIAL FIREFIGHTING PROCEDURES:	None
UNUSUAL FIRE AND EXPLOSION HAZARDS:	None

SECTION V - HEALTH HAZARD DATA

PERMISSABLE EXPOSURE LEVEL:	Not established for product.
EYES:	Dusts are extrinsically corrosive to the eyes. Prolonged contact can cause severe injury. Solutions of product are irritating to the eyes.
SKIN:	Prolonged contact with solid material may cause reddening and burns. Contact with solution of product can cause irritation and contact dermatitis.
BREATHING:	Dusts are extremely irritating to the respiratory system.
SWALLOWING:	Dusts are irritating to the mouth and throat. Swallowing dusts or solutions causes burning of the mouth, throat and stomach accompanied by pain, nausea, and possible collapse.
CHRONIC EXPOSURE:	May result in destruction of tissues contacted and irritating dermatitis. Inhalation of dusts and mists can cause varying degrees of damage to the effected tissues and increase susceptibility to respiratory illness. Prolonged or repeated overexposure may result in kidney damage.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:	None known.

FIRST AID

EYE CONTACT:	Flush eyes with plenty of running water for at least 15 minutes, occasionally lifting upper and lower lids to ensure flushing entire eye surface. Get immediate medical attention.
SKIN CONTACT:	Immediately wash skin with plenty of water. Remove contaminated clothing and shoes. Wash clothing and shoes before reuse. Get medical attention if irritation persists.

ECCO CHEMICALS, INC.

SECTION V - HEALTH HAZARD DATA (cont.)

INHALATION: Remove victim to fresh air. Give artificial respiration if not breathing. Get immediate medical attention.

INGESTION: If swallowed, DO NOT induce vomiting. Dilute with several glasses of water, fruit juice or milk, if available. If vomiting takes place spontaneously, give additional fluids. Never give anything by mouth to an unconscious person. Get immediate medical attention.

PRIMARY ROUTES
OF ENTRY: Skin and/or eye contact, inhalation.

SECTION VI - REACTIVITY DATA

HAZARDOUS POLYMERIZATION: Will not occur.
STABILITY: Stable
INCOMPATIBILITY: Strong acids

SECTION VII - SPILL AND LEAK PROCEDURES

POWDER SPILLS: Sweep up and return to container.

SMALL LIQUID SPILLS: Mop up and flush area with water.

LARGE LIQUID SPILLS: Stop leak at source. Prevent spread of spill by diking. Carefully neutralize spill with dilute acid. Keep non-neutralized material out of sewers, drains, surface water and soil.

WASTE DISPOSAL METHOD: Flush neutralized material to sanitary sewer with large amounts of water where permitted by local authorities. Consult federal, state, and local authorities to ascertain proper disposal methods for your particular situation.

SECTION VIII - PROTECTIVE EQUIPMENT TO BE USED

RESPIRATORY PROTECTION: Use NIOSH/MSHA approve dust/mist filter respirators for routine work purposes. Respiratory protection programs must meet the requirements of 29CFR 1910.132.

VENTILATION: Local exhaust to reduce exposure below permissible limits. See CFR 1910.132.

ECCO CHEMICALS, INC.

SECTION VIII - PROTECTIVE EQUIPMENT TO BE USED (cont.)

PROTECTIVE GLOVES: Rubber or plastic gloves.

EYE PROTECTION: Chemical splash goggles or face shield meeting the requirements of 29CFR 1910.133.

OTHER PROTECTIVE EQUIPMENT: Rubber safety shoes.

SECTION IX - SPECIAL PRECAUTIONS AND OTHER COMMENTS

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solids), all hazard precautions given in this data sheet should be observed.

The information accumulated herein is believed to be accurate, but is not warranted to be whether originating with the company or not. Recipients are advised to confirm in advance of need that the information is current, applicable and suitable for their circumstances.



CLEAN ACROSS AMERICA AND
THROUGHOUT THE WORLD™

ZEP MANUFACTURING COMPANY
P.O. BOX 2015
ATLANTA, GEORGIA 30301

MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

12/10/93

ISSUE DATE: 03/08/93
SUPERSEDES: 05/01/92
ZEP DYNA 143
PRODUCT NO.: 0366

Parts Cleaner

ROWLAND TRUCKING CO INC
418 SOUTH GRINES
HOBBS, NM 88241

SECTION I - EMERGENCY CONTACTS

TELEPHONE:
(404) 352-1680 BETWEEN 8:00 AM - 5:00 PM (EST)

MEDICAL EMERGENCY:
(404) 435-2973 NON-OFFICE HOURS, WEEKENDS
(404) 432-2873 AND HOLIDAYS. PLEASE CALL YOUR
(404) 424-4789 LOCAL POISON CONTROL
(404) 319-6151
(404) 242-3561

TRANSPORTATION EMERGENCY:
(404) 922-0923

CHEMTREC:
1-800-424-9300 TOLL-FREE - ALL CALLS RECORDED
DISTRICT OF COLUMBIA:
(202) 483-7616 ALL CALLS RECORDED

SECTION II - HAZARDOUS INGREDIENTS

DESIGNATIONS

* LIGHT ALIPHATIC NAPHTHA ** solvent naphtha (petroleum), medium aliphatics; CAS # 64742-88-7, RTECS # NONE;
SUPPLIER SUGGESTED TLV - 100 ppm

TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD.
100	IRR CBL	> 90

SECTION III - HEALTH HAZARD DATA

Special Note: MSDS data pertains to the product as dispensed from the container. Adverse health effects would not be expected under recommended conditions of use (diluted) so long as prescribed safety precautions are practiced.

Acute Effects of Overexposure:

Overexposure to the vapors from this product may produce mucous membrane irritation, particularly of the eye and respiratory tract. Overexposure to vapors may also produce mild central nervous system depression characterized by headache, dizziness, nausea, and stupor, leading to unconsciousness in extreme cases. Introduction of solvents, as in aspiration of vomitus fluid, may produce chemical pneumonia. Existing respiratory disorders and lung diseases may be aggravated by inhalation of vapors.

Chronic Effects of Overexposure:

Skin which is repeatedly defatted by contact with this product may be more susceptible to irritation, infection, or dermatitis. None of the hazardous ingredients are listed as carcinogens by IARC, NTP, & OSHA

Est'd PEL/TLV: 100 ppm

Primary Routes of Entry: Inh, Skin.

HMS Codes: HEALTH 2;FLAM. 2;REACT. 0;PERS. PROTECT. B ;CHRONIC HAZ. YES

FIRST AID PROCEDURES:

Skin: Wash contaminated skin thoroughly with soap or a mild detergent. Apply skin cream with lanolin. Get medical attention if irritation persists.
Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting upper and lower lids. Get medical attention at once.
Inhale: Move exposed person to fresh air. If irritation persists, get medical attention promptly.
Ingest: If swallowed, do not induce vomiting. If vomiting occurs, keep head below hip level. Get emergency medical attention immediately.

SECTION IV - SPECIAL PROTECTION INFORMATION

Protective Clothing: Wear neoprene, nitrile, or natural rubber gloves or gloves with proven resistance to the ingredients listed.
Eye Protection: Wear tight-fitting splash-proof safety glasses especially if contact lenses are worn.
Respiratory Protection: When exposure levels exceed PEL TLV (likely in confined areas) use an organic vapor respirator (eg Zep 2211).
Ventilation: Provide local exhaust/ventilation needed to keep concentration of vapors below exposure limits (PEL/TLV).

SECTION V - PHYSICAL DATA

Boiling Point (*F): 368 Initial	Specific Gravity: 0.785	Vapor Pressure (mmHg): <5
Percent Volatile by Volume (%): 100	Vapor Density (air = 1): 5.3	Evaporation Rate (BUTYL ACETATE = 1): 0.14
Solubility in Water: INSOLUBLE	pH (concentrate): N/A	pH (use dilution of): N/A
Appearance and Odor: A CLEAR, WATER-WHITE LIQUID WITH A MILD ODOR.		

SECTION VI - FIRE AND EXPLOSION DATA

Flash Point (*F) (method used): 143F (TCC)
Flammable Limits: LEL 1% UEL 7%
Extinguishing Media: Carbon dioxide, dry chemical, water fog, foam.
Special Fire Fighting: Wear self-contained positive pres. breathing apparatus.
Unusual Fire Hazards: Direct water onto intact containers to prevent bursting.

SECTION VII - REACTIVITY DATA

Stability: Stable
Incompatibility (avoid): Heat, open flame, spark, and oxidizing agents.
Polymerization: Will not occur.
Hazardous Decomposition: Carbon dioxide, carbon monoxide, and other unidentified organic compounds.

SECTION VIII - SPILL AND DISPOSAL PROCEDURES

Steps to be Taken in Case Material is Released or Spilled:

Immediately eliminate all flame, ignition and high-heat sources. Absorb spill on inert absorbent material (e.g. Zep-O-Zorb). Pick up and place residue in a clean, D.O.T. specification container for disposal. Wash area thoroughly with a detergent solution and rinse well with water.

Waste Disposal Method:

Liquid wastes are not permitted in landfills. Product is not considered a hazardous waste under RCRA. Unusable liquid may be absorbed on an inert absorbent material (e.g. Zep-O-Zorb), drummed, and taken to a chemical or industrial landfill. Pretreatment may be required before landfilling. Consult local, state, or federal agencies for proper disposal in your area.

RCRA Hazardous Waste Numbers: N/A

SECTION IX - SPECIAL PRECAUTIONS

Precautions to be Taken When Handling and Storing:

Combustible! Store and use away from heat, sparks, open flame, or any source of ignition. Post "No Smoking" signs according to local regulations for combustible liquids. Keep product away from skin and eyes. Do not breathe spray mists or vapors. Clothing or shoes which become contaminated with substance should be removed promptly and not worn until thoroughly cleaned. Store tightly closed container in a dry area at temps. between 40-120 degrees F. Keep out of the reach of children.

SECTION X - TRANSPORTATION DATA

DOT Proper Shipping Name: NONE

DOT Hazard Class: N/A

DOT I.D. Number: N/A

DOT Label/Placard: NONE

EPA TSCA Chemical Inventory: ALL INGREDIENTS ARE LISTED

EPA CWA 40CFR Part 117 substance (RQ in a single container): N/A

NOTICE

Thank you for your interest in, and use of, Zep products. Zep Manufacturing Co. is pleased to be of service to you by supplying this Material Safety Data Sheet for your files. Zep Manufacturing is concerned for your health and safety. Zep products can be used safely with proper protective equipment and proper handling practices consistent with label instructions and the MSDS. Before using any Zep product, be sure to read the complete label and the Material Safety Data Sheet.

As a further word of caution, Zep wishes to advise that serious accidents have resulted from the misuse of "emptied" containers. "Empty" containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT pressurize, cut, weld, braze, solder, drill, grind or expose such containers to heat, flame, or other sources of ignition; they may explode or develop harmful vapors and possibly cause injury or death. Clean empty containers by triple rinsing with water or an appropriate solvent. Empty containers must be sent to a drum reconditioner before reuse.

TERMS AND ABBREVIATIONS USED IN THE MSDS:
BY SECTION ALPHABETICALLY:

SECTION II: HAZARDOUS INGREDIENTS

CAR: Carcinogen - A chemical listed by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC) or OSHA as a definite or possible human cancer causing agent.

CAS #: Chemical Abstract Services Registry Number - A universally accepted numbering system for chemical substances.

CBL: Combustible - At temperatures between 100°F and 200°F chemical gives off enough vapor to ignite if a source of ignition is present as tested with a closed cup tester.

CNS: Central Nervous System depressant reduces the activity of the brain and spinal cord.

COR: Corrosive - Causes irreversible alterations in living tissue (e.g. burns).

DESIGNATIONS: Chemical and common names of hazardous ingredients.

EIR: Eye Irritant Only - Causes reversible reddening and/or inflammation of eye tissues.

EXPOSURE LIMITS: The time weighted average (TWA) airborne concentration at which most workers can be exposed without any expected adverse effects. Primary sources include ACGIH TLV's, and OSHA PEL's (TWA, STEL and ceiling limits).

ACGIH: American Conference of Governmental Industrial Hygienists.

CEILING: The concentration that should not be exceeded in the workplace during any part of the working exposure.

OSHA: Occupational Safety and Health Administration

PEL: Permissible Exposure Limit- A set of time weighted average exposure values, established by OSHA, for a normal 8-hour day and a 40-hour work week.

PPM: Parts per million - unit of measure for exposure limits.

(S) SKIN: Skin contact with substance can contribute to overall exposure.

STEL: Short Term Exposure Limit- Maximum concentration

for a continuous 15-minute exposure period.

TLV: Threshold Limit Value - A set of time weighted average exposure limits, established by the ACGIH, for a normal 8-hour day and a 40-hour work week.

FBL: Flammable - At temperatures under 100°F, chemical gives off enough vapor to ignite if a source of ignition is present as tested with a closed cup tester.

HAZARDOUS INGREDIENTS: Chemical substances determined to be potential health or physical hazards by the criteria established in the OSHA Hazard Communication Standard - 29 CFR 1910.1200

HTX: Highly toxic - the probable lethal dose for 70 kg (150 lb.) man and may be approximated as less than 6 teaspoons (2 tablespoons).

IRR: Irritant - Causes reversible effects in living tissues (e.g. inflammation) - primarily skin and eyes.

N/A: Not Applicable - Category is not appropriate for this product.

NID: Not Determined - Insufficient information for a determination for this item.

RTECS #: Registry of Toxic Effects of Chemical Substances - an unreviewed listing of published toxicology data on chemical substances.

SARA: Superfund Amendments and Reauthorization Act - Section 313 designates chemicals for possible reporting for the Toxics Release Inventory.

SEN: Sensitizer - Causes allergic reaction after repeated exposure.

TOX: Toxic - The probable lethal dose for a 70 kg (150 lb.) man is one ounce (2 tablespoons) or more.

SECTION III: HEALTH HAZARD DATA

ACUTE EFFECT: An adverse effect on the human body from a single exposure with symptoms developing almost immediately after exposure or within a relatively short time.

CHRONIC EFFECT: Adverse effects that are most likely to occur from repeated exposure over a long period of time.

EST'D PEL/TLV: This estimated, time-weighted average, exposure limit, developed by using a formula provided by the ACGIH, pertains to airborne concentrations from the product as a whole. This value should serve as guide for providing safe workplace conditions to nearly all workers.

HMIS CODES: Hazardous Material Identification System - a rating system developed by the National Paint and Coating Association for estimating the hazard potential of a chemical under normal workplace conditions. These risk estimates are indicated by a numerical rating given in each of three hazard areas (Health Flammability/Reactivity) ranging from a low of zero to a high of 4. A chronic hazard is indicated with a yes. Consult HMIS training guides for Personal Protection letter codes which indicate necessary protective equipment.

PRIMARY ROUTE OF ENTRY: The way one or more hazardous ingredients may enter the body and cause a generalized-systemic or specific-organ toxic effect.

ING: Ingestion - A primary route of exposure through swallowing of material.

INH: Inhalation - A primary route of exposure through breathing of vapors.

SKIN: A primary route of exposure through contact with

the skin.

SECTION IV: SPECIAL PROTECTION INFORMATION

Where respiratory protection is recommended, use only MSHA and NIOSH approved respirators and dust masks.

MSHA: Mine Safety and Health Administration

NIOSH: National Institute for Occupational Safety and Health.

SECTION V: PHYSICAL DATA

EVAPORATION RATE: it refers to the rate of change from the liquid state to the vapor state at ambient temperature and pressure in comparison to a given substance (e.g. water).

pH: A value representing the acidity or alkalinity of an aqueous solution (Acidic pH = 1; Neutral pH = 7; Alkaline pH = 14)

PERCENT VOLATILE: The percentage of the product (liquid or solid) that will evaporate at 212°F and ambient pressure.

SOLUBILITY IN WATER: A description of the ability of the product to dissolve in water.

SECTION VII: REACTIVITY DATA

HAZARDOUS DECOMPOSITION: Breakdown products expected to be produced upon product decomposition or fire.

INCOMPATIBILITY: Material contact and conditions to avoid to prevent hazardous reactions.

POLYMERIZATION: Indicates the tendency of the product's molecules to combine in a chemical reaction releasing excess pressure and heat.

STABILITY: Indicates the susceptibility of the product to spontaneously and dangerously decompose.

SECTION VIII: SPILL AND DISPOSAL PROCEDURES

RCRA WASTE NOS: RCRA (Resource Conservation and Recovery Act) waste codes (40 CFR 261) applicable to the disposal of spilled or unusable product from the original container.

SECTION X: TRANSPORTATION DATA

CWA: Clean Water Act

RO: Reportable Quantity - The amount of the specific ingredient that, when spilled to the ground and can enter a storm sewer or natural watershed, must be reported to the National Response Center, and other regulatory agencies.

TSCA: Toxic Substances Control Act - a federal law requiring all commercial chemical substances to appear on an inventory maintained by the EPA.

DISCLAIMER

All statements, technical information and recommendations contained herein are based on available scientific tests or data which we believe to be reliable. The accuracy and completeness of such data are not warranted or guaranteed. We cannot anticipate all conditions under which this information and our products, or the products of other manufacturers in combination with our products, may be used. Zep assumes no liability or responsibility for loss or damage resulting from the improper use or handling of our products, from incompatible product combinations, or from the failure to follow instructions, warnings, and advisories in the product's label and Material Safety Data Sheet.

(Notice Revised 8/91)

MATERIAL SAFETY DATA SHEET

50001

SECTION I	
MANUFACTURER'S NAME Champion Chemicals, Inc. ADDRESS 3130 FM 521, Fresno, Texas 77545 P.O. Box 450499, Houston, Texas 77245	EMERGENCY TELEPHONE NO. 713/431-2561 178587424-9300
CHEMICAL FAMILY Cationic Surfactant Blend	PRODUCT SURFATRON DP-61 FORMULA Proprietary

SECTION II - HAZARDOUS INGREDIENTS					
MATERIALS	%	TLV (Units)	MATERIALS	%	TLV (Units)
Methanol (67561)	23	200 PPM			
RQ=49 Drums					

SECTION III - PHYSICAL DATA			
BOILING POINT (° F.)	180-212	SPECIFIC GRAVITY (H ₂ O = 1)	0.95-1.0
VAPOR PRESSURE (mm Hg.)	ND	PERCENT VOLATILE BY VOLUME (%)	27
VAPOR DENSITY (AIR = 1)	ND	EVAPORATION RATE	ND-9
SOLUBILITY IN WATER	Partially Soluble	VISCOSITY	8-9
APPEARANCE AND ODOR Brown aqueous liquid, non-viscous with methanolic odor. Carcinogen: no			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA			
FLASH POINT	F (TCC)	FLAMMABLE LIMITS	LEL 6.7 UEL 36
EXTINGUISHING MEDIA <input type="checkbox"/> ALCOHOL FOAM <input checked="" type="checkbox"/> CARBON DIOXIDE <input checked="" type="checkbox"/> DRY CHEMICAL <input type="checkbox"/> FOAM <input checked="" type="checkbox"/> WATER SPRAY (FOG) <input type="checkbox"/> OTHER Flammable limits based on pure Methanol.			

SPECIAL FIRE FIGHTING PROCEDURES Water spray may be used to cool fire exposed metal containers to prevent re-ignition from hot surfaces. Do not breathe smoke or hot fumes.	
UNUSUAL FIRE AND EXPLOSION HAZARDS None known	

TRANSPORTATION DATA	
US DEPARTMENT OF TRANSPORTATION HAZARD CLASS Flammable Liquid	<input type="checkbox"/> UNREGULATED BY D.O.T.
LABEL REQUIRED Flammable # 2	
US D.O.T. PROPER SHIPPING NAME Flammable Liquid, NOS	UN NUMBER UN 1993

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

200 PPM based on volatile portion.

EFFECTS OF OVEREXPOSURE

EYES Irritation, burning, itching and pain.
 SKIN CONTACT Irritation, redness. sensitized skin may show signs of dermatitis.
 INHALATION Nausea, dizziness, pneumonia if aspirated.
 IF SWALLOWED Nausea, vomiting, lightheadedness, and other symptoms of methanol poisoning.

EMERGENCY AND FIRST AID PROCEDURES

EYES Flush copiously with water immediately for 15 - 20 minutes, get medical treatment.
 SKIN CONTACT Wash with soap and water. Remove contaminated clothing and wash skin with soap and water. Launder clothing before reweaving.
 INHALATION Remove to fresh air. If breathing is difficult, give oxygen. If breathing stops, give artificial respiration.
 IF SWALLOWED Drink water to dilute. INDUCE vomiting. Get emergency medical treatment for ingestion of methanol.

SECTION VI - REACTIVITY DATA

STABILITY:	UNSTABLE	STABLE	CONDITIONS TO AVOID	Sources of ignition
			X	

INCOMPATABILITY (Materials to avoid)

Oxidizers such as chromates or chlorine

HAZARDOUS DECOMPOSITION PRODUCTS

Smoke, fumes, carbon monoxide, carbon dioxide, oxides of nitrogen.

HAZARDOUS POLYMERIZATION:	MAY OCCUR	WILL NOT OCCUR	CONDITIONS TO AVOID
			X None known

SECTION VII - SPILL OR LEAK PROCEDURES

Stop the flow of liquid, eliminate sources of ignition. Dike or otherwise stop spreading. Vacuum up, absorb or scrape up liquid and contaminated soil. Put into containers for later disposal in approved incinerator or chemical landfill.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type)

None needed in routine use

VENTILATION	LOCAL EXHAUST Recommended	SPECIAL Entering tanks or cleaning up spills; air supply recommended.
	MECHANICAL (General) Adequate to remove vapors	

PROTECTIVE GLOVES neoprene or latex rubber	EYE PROTECTION Chemical safety goggles
---	---

OTHER PROTECTIVE EQUIPMENT
 Eyewash stations, ample water supply; showers.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
 Keep away from sparks and excessive heat. Avoid contact.

OTHER PRECAUTIONS

Know and be able to use first aid and fire fighting procedures.
 Fire=4 Reactivity=1 Health=0

HAZARD RATING SCALE:

4 SEVERE
 3 SERIOUS
 2 MODERATE
 1 SLIGHT
 0 MINIMAL

The information contained herein is based on data considered accurate. However, no warranty, expressed or implied, is given regarding the accuracy of these data or the results to be obtained from the use thereof.

MATERIAL SAFETY DATA SHEET 20051

SECTION I	
MANUFACTURER'S NAME Champion Chemicals, Inc. ADDRESS 3130 FM 521, Fresno, Texas 77545 P.O. Box 450499, Houston, Texas 77245	EMERGENCY TELEPHONE NO. 713/431-2561 1/800/424-9300 PRODUCT GYPTRON T-133 FORMULA Proprietary
CHEMICAL FAMILY Phosphonate-Polymer	

SECTION II - HAZARDOUS INGREDIENTS					
MATERIALS	%	TLV (Units)	MATERIALS	%	TLV (Units)
Methanol (67561)	8-10	200 (PPM)			
RQ=87.7 Drums					

SECTION III - PHYSICAL DATA			
BOILING POINT (° F.)	175-200	SPECIFIC GRAVITY (H ₂ O = 1)	1.25-1.3
VAPOR PRESSURE (mm Hg.)	<96	PERCENT VOLATILE BY VOLUME (%)	35-40
VAPOR DENSITY (AIR = 1)	>1	EVAPORATION RATE	NA
SOLUBILITY IN WATER	Soluble	Viscosity	15 cps
APPEARANCE AND ODOR: Clear liquid with slight odor Carcinogen: no			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA			
FLASH POINT	88 F (TCC)	FLAMMABLE LIMITS	LEL 6.7 UEL 36
EXTINGUISHING MEDIA <input type="checkbox"/> ALCOHOL FOAM <input checked="" type="checkbox"/> CARBON DIOXIDE <input checked="" type="checkbox"/> DRY CHEMICAL <input checked="" type="checkbox"/> FOAM <input checked="" type="checkbox"/> WATER SPRAY (F)			
<input type="checkbox"/> OTHER: Flammable limits based on volatile portion of product.			

SPECIAL FIRE FIGHTING PROCEDURES

Water spray may be used to cool fire exposed metal containers to prevent re-ignition from hot surfaces
 Do not breathe smoke or hot fumes.

UNUSUAL FIRE AND EXPLOSION HAZARDS

None

TRANSPORTATION DATA	
US DEPARTMENT OF TRANSPORTATION HAZARD CLASS Flammable liquid	<input type="checkbox"/> UNREGULATED BY D.O.T.
LABEL REQUIRED Flammable # 2	
US D.O.T. PROPER SHIPPING NAME Flammable liquid, NOS	UN NUMBER UN 1993

NA = Not Applicable

ND = No Data Available

NE = Not Established

Champion Chemicals Modified Form OSHA

Prepared By:

Ben Flaminio

Date: 3/16/88 Revised

SECTION V - HEALTH HAZARD DATA			
THRESHOLD LIMIT VALUE			
200 ppm			
EFFECTS OF OVEREXPOSURE			
EYES	May cause reddening and conjunctivitis.		
SKIN CONTACT	Prolonged exposure may cause irritation, defatting, and signs of dermatitis		
INHALATION	Nausea, dizziness; pneumonia if aspirated.		
IF SWALLOWED	Nausea, vomiting, lightheadedness, and other symptoms of methanol poisoning.		
EMERGENCY AND FIRST AID PROCEDURES			
EYES	Flush copiously with water immediately for 15 - 20 minutes, get medical treatment.		
SKIN CONTACT	Remove contaminated clothing and flush skin with water.		
INHALATION	Remove to fresh air. If breathing is difficult, give oxygen. If breathing stops, give artificial respiration.		
IF SWALLOWED	Drink water to dilute. INDUCE vomiting. Get emergency medical treatment for ingestion of methanol.		
SECTION VI - REACTIVITY DATA			
STABILITY:		CONDITIONS TO AVOID	
UNSTABLE	STABLE	X sources of ignition and open flames	
INCOMPATIBILITY (Materials to avoid)			
strong oxidizing agents			
HAZARDOUS DECOMPOSITION PRODUCTS			
smoke, fumes, carbon dioxide			
HAZARDOUS POLYMERIZATION:		CONDITIONS TO AVOID	
MAY OCCUR	WILL NOT OCCUR	X NA	
SECTION VII - SPILL OR LEAK PROCEDURES			
Stop the flow of liquid, eliminate sources of ignition. Dike or otherwise stop spreading. Vacuum up, absorb or scrape up liquid and contaminated soil. Put into containers for later disposal in approved incinerator or chemical landfill. Observe all governmental spill and water quality regulations. Remove soiled clothing.			
SECTION VIII - SPECIAL PROTECTION INFORMATION			
RESPIRATORY PROTECTION (Specify type)			
None required under normal conditions.			
VENTILATION	LOCAL EXHAUST	SPECIAL	
	recommended	Entering tanks or cleaning up spills; air supply recommended.	
	MECHANICAL (General)		
	adequate to dispel fumes		
PROTECTIVE GLOVES		EYE PROTECTION	
neoprene		splash goggles	
OTHER PROTECTIVE EQUIPMENT			
eyewash stations, ample water supply; showers			
SECTION IX - SPECIAL PRECAUTIONS			
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING			
General good housekeeping practices should be observed. Clean up any spills promptly.			
OTHER PRECAUTIONS			
DO NOT INGEST. Fire=3 Reactivity=1 Health=0			

Champion Chemical

HAZARD RATING SCALE:

4 SEVERE
3 SERIOUS
2 MODERATE
1 SLIGHT
0 MINIMAL

The information contained herein is based on data considered accurate. However, no warranty, expressed or implied, is given regarding the accuracy of these data or the results to be obtained from the use thereof.

FACILITY SAFETY/ ENVIRONMENTAL INSPECTION CHECKLIST					Sep. 91
MONTH					
LOCATION					
INSPECTOR					
PERSON ACCOMPANYING INSP.					
		DATE	DATE	DATE	DATE
ITEM	COMMENTS				
Fire extinguishers	Inspected monthly, charged and in place				
First Aid Kits	Maintain contents, & eye wash solution				
Eye Washes	Sterile, current date				
MSDS	All chemicals, accessible, including reag.				
Signs	Appropriate and legible				
Security	Locks, lights, etc.				
Bulk Tanks	No leaks, trucks using bonding cables				
a. Dikes	No standing water, intact, sump empty				
b. Hazcom labels	Appropriate, legible				
c. Valves & Plugs	Closed, no leaks				
d. Spill buckets	Carried on truck & under valves if inside				
Drums					
a. Dikes	No standing water, no leaks				
b. Empties	Horizontal, no holes, bunged, chocked				
c. Concrete	Not on dirt				
d. Labels	Hazcom, DOT, appropriate and legible				
Spill Kits	Available and full of pigs, tyvek, labels				
Salvage drum	Available, labeled				
Hazardous waste storage	Properly labeled, log sheet, location, leaks				
Monthly hazardous waste rep	Reports monthly				
Personal protective equip.	Available and being used				
Housekeeping	Neat, no trash, no chemicals,				
Eye wash and shower	Eye wash in all locations, and operable				
Trucks	Inspected daily, in good repair,				
Sewers/Drains/Sinks	No chemicals down sewer, sign on sink				
Electrical	GFCI 6' of sinks, grounded plugs, to code				
SCBA	Inspected monthly, charged and clean				
Forklifts	Condition, backup alarm				
DOT	Trucks placarded, driver files OK				
SARA records	LEPC notified of chemical stored				
Safety meetings	Held monthly, documented				
H2S Monitors	Monthly calibration, and recorded				
Containers (all sizes)	Tops on and labeled				
Field Samples	No accumulation, proper disposal				
Facility inspections	Being performed and documented				
Soil spots (Are there any?)	Loading area, yard, warehouse				
Inventory	Not over 6 mo.				
Place a checkmark in the column if the Inspected Item is OK.					
Place an X in the column if the Inspected Item is unacceptable.					
Correct it if you can. Report it to your supervisor if you cannot.					
COMMENTS (Use back if necessary)					

SPILL REPORT FORM

DIRECTIONS ON REVERSE SIDE

No.:

Substance Trade Name: _____

Date Spill Occurred/Discovered: _____ Time: _____ Time to cleanup: _____

Location (Be Specific): _____

Location Address: _____ County: _____ St: _____

Size/Type of Container: _____ Physical State: _____

Volume or Weight of Spill: _____ Qty. Material Collected: _____

Describe all persons and events leading to the spill: _____

Describe methods, tools, equipment, and materials used in containment & cleanup: _____

List of all persons participating in cleanup and containment: _____

Reported by: _____ Reported to: _____

Date Reported: _____ Time Reported: _____

FOR OFFICE USE ONLY

Constitituents	Percent	RQ Value

Lab Tests by: _____ pH: _____ Flash Point: _____

Disposal Procedures: _____

ADDITIONAL REPORTS

Agency Name(s): _____ Phone #: _____

Individuals Contacted: _____ Ext. Report#: _____

Reported By: _____ Date: _____ Time: _____

Comments: _____

Dollars assigned to spill: _____

Exhibit 5a

REPORT FORM

Directions: Any spill of a chemical substance in a quantity greater than one pound or one pint must be reported immediately to your supervisor and the Safety Department. The term spill refers to any contact between a chemical substance and soil, pavement, concrete or water, whether inside or outside of the workplace. A spill may also involve the evaporation of a volatile chemical substance into the air which may require a report. All spills must be properly contained and disposed of. The proper personal protective equipment (goggles, rubber gloves, respirator, coveralls, rubber boots, etc.) must be worn at all times.

In the event of a spill, follow these steps:

1. Determine the nature of the chemical substance. Visually estimate the quantity spilled;
2. Prevent others from entering the area and report to your supervisor or the Safety Department;
3. Wear the appropriate personal protective equipment as determined by the MSDS, consultations with your supervisor and/or consultations with the safety department;
4. Eliminate all sources of ignition. It may be necessary to shut off nearby electrical circuits;
5. Contain the substance by appropriate methods. Check the MSDS and consult with your supervisor or the Safety Department. Measure the amount spilled;
6. Place all material and, if applicable, all soil, sand, gravel, etc. in a clean or undamaged previously used container (open top drum, five gallon pail or bucket, etc.) and seal tightly. Place all disposable cleanup items (rags, towels, absorbent pigs, coveralls, gloves, etc.) in an appropriate container and seal;
7. Mark the top and side of the containers with the identification number provided by the Safety Department. Do not move containers offsite unless the spill occurred at a location not owned by Unichem. If necessary, move the containers to the nearest Unichem owned facility;
8. Complete the Report Form on the opposite side. Complete all blanks in the upper portion of the form. If an answer is not applicable or unknown then write "N/A" or "UNK". Be very specific and detailed in writing the descriptions. Describe the physical state as liquid, solid, vapor, or gas. Describe the container from which the spill occurred: 55 gal. steel unlined drum, '87 Chev Tank #2, XYZ Storage Tank Ave. Sign the report in the space: "Reported By:" and
9. Turn in the report to your supervisor or Safety Department.

ROWLAND TRUCKING CO., INC. EMERGENCY PHONE NUMBERS

24 hours a day phone number

(505) 397-4994

Caprock Answering Service 393-7155
*Has name of management on call!

<u>Contact</u>	<u>Title</u>	<u>Phone No.</u>
Pete M. Turner	Manager	392-5005
Bruce Baird	Asst. Manager	397-4047
Jerry Wolz	Pusher	392-4210
Ronnie Morgan	Pusher	392-9600
Robert Mullins	Pusher	392-3616
Gene Butler	Safety	392-4721

Medical Facilities

Lea Regional Hospital 392-6581
Norte Vista Medical Center 392-5571

Ambulance Service 911

Law Enforcement

Hobbs Police Department 397-9265
Emergency 911
New Mexico State Police 392-5588
Emergency 911
Sheriff Department 393-2515
Emergency 911
Fire Department 397-9308
Emergency 911

Government Agencies

New Mexico Oil Conservation Division 393-6161

ROWLAND TRUCKING COMPANY

PHONE
(505) 397-4994

418 SOUTH GRIMES
HOBBS, NEW MEXICO 88240

PHONE
(505) 393-9023

September 22, 1994

In reply to a request from the State of New Mexico Environment Department to make local police, fire and emergency response authorities familiar with any possible hazardous waste characteristics of Rowland Trucking Co., Inc. A meeting was held to exchange and review information required now or in the future.

Items of Discussion and Reviewed:

1. Facility Map
2. Spill Control, Fire Fighting and Safety Equipment
3. Bulk Fuel, Oil and Chemical Storage
4. Emergency Contacts and/or Phone Numbers
5. Any pertinent information as deemed necessary by attending personnel.

PERSONS IN ATTENDANCE

David Hooten

City of Hobbs Emergency Management/Safety Director



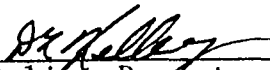
Lt. Jim Woods

State of New Mexico Police Department



Sgt. Dennis Kelly

City of Hobbs Police Department



Capt. Mike Ravenelle

City of Hobbs Fire Department



Y. Hart



THE CITY OF

HOBBS, NEW MEXICO

(505) 397-9231

300 NORTH TURNER

HOBBS, NEW MEXICO 88240

FAX # (505) 397-9334

Office of
EMERGENCY MANAGEMENT/SAFETY
LEPC—SARA TITLE III
HAZ-MAT

September 22, 1994

Rowland Trucking Company, Inc.
Attention: Pete Turner
418 S. Grimes, P. O. Box 340
Hobbs, New Mexico 88240

Dear Mr. Turner:

The following is provided in response to your request for answers to questions raised by the New Mexico Environment Department, HWRB Section, concerning the enforcement variance that Rowland Trucking received and must respond to in corrective actions:

1. City of Hobbs Police and Fire Department representatives, Emergency Management/LEPC Chair, New Mexico State Police and the New Mexico Oil Conservation Commission met with you, Terry Short and R. Calhoun of Rowland Trucking on this date at 9:00 a.m. to discuss items listed on the enforcement variance.
2. The following items were discussed:
 - a. Facility map;
 - b. Bulk storage on site;
 - c. Emergency contacts and phone numbers;
 - d. Emergency response measures to spill control;
 - e. Questions and answers by those in attendance.
3. As discussed during the meeting, all agencies acknowledged they have the Hazardous Material Emergency notifications listed in accordance with SARA/Title III requirements. Police and Fire Departments have personnel contacts/standard response measures which include calling this office in any emergency.
4. Both the Emergency Management/LEPC Office and the Hobbs Fire Marshal's Office have the required SARA, MSDS, site plans and emergency actions for Rowland Trucking on file.

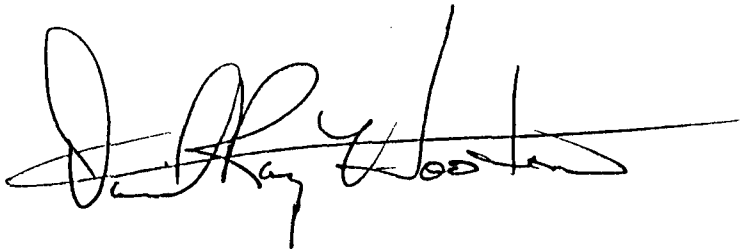
Page 2

Letter to Rowland Trucking Company, Inc.
September 22, 1994

5. Hazardous chemical signs posted at the actual trucking terminal facility were appropriate, and telephone emergency contacts are noted.

The information requested on the State of New Mexico enforcement variance is at hand with the City of Hobbs and the Lea County LEPC.

Sincerely,

A handwritten signature in black ink, appearing to read "David Ray Hooten", with a long horizontal flourish extending to the right.

DAVID RAY HOOTEN
Emergency Management/Safety Director, LEPC Chairman

xc: Max Johnson, Chemical Safety Office
Paul Pusateri, City Attorney

DRH/brv

— Exhibit 6b (2 of 2) —



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

September 27, 1994

Mr. Pete Turner
Rowland Trucking Company, Inc.
418 S. Grimes St.
Hobbs, NM 88240

RE: SPCC Compliance Inspection for:
Rowland Trucking Company, Inc.
418 S. Grimes St.
Hobbs, Lea County, New Mexico

Dear Mr. Turner:

On August 2, 1994, Jonathan McCoy and Leticia Ayala, representatives of the U.S. Environmental Protection Agency, conducted a Spill Prevention Control and Countermeasure (SPCC) Compliance Inspection of the above named facility. Thank you for the cooperation extended to our inspectors during their visit.

Based on our observations, the Rowland Trucking facility is not subject to SPCC regulations (40 CFR Part 112).

Sincerely,

A handwritten signature in cursive script, reading "Donald P. Smith".

Donald P. Smith,
SPCC Coordinator (6E-EP)
(214) 665-6489

cc: Marcy Leavitt, Chief
Groundwater Bureau
New Mexico Environmental Department
P.O. Box 26110
1190 St. Francis Drive
Santa Fe, NM 87502



ROWLAND TRUCKING COMPANY

A DIVISION OF

EUNICE RENTAL TOOL COMPANY

418 SOUTH GRIMES

HOBBS, NEW MEXICO 88240

PHONE

[505] 397-4994

PHONE

[505] 393-9023

August 17, 1992

Mr. Chris Eustice
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88241-1980

Re: Conformation of telephone conversation with Pete Turner

Dear Mr. Eustice:

We are awaiting your approval to haul our washbay-sand trap sediments into Parabo's disposal facility. I want to confirm the following:

- 1) Our washbay operating procedures have not changed since our last disposal haul of such dirt.
- 2) The removed dirt is now in temporary storage pits (plastic lined and covered) within the yard.
- 3) There is no use of solvents during truck washing operations.

We feel that the last tests run on the sumps are characteristic to the ones on hand now. Enclosed are copies run by the independent laboratories showing no hazardous characteristics present.

Rowland Trucking will wait on your authorization to transfer this dirt.

Your attention is appreciated.

Sincerely,

ROWLAND TRUCKING COMPANY

Richard Brakey
Vice President

RB/dm

Exhibit 9a

ROWLAND TRUCKING COMPANY

PHONE
[505] 397-4994

418 SOUTH GRIMES
HOBBS, NEW MEXICO 88240

PHONE
[505] 393-9023

September 21, 1994

Mr. Wayne Price
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88241-1980

Re: Movement of Washbay Sand Trap Sediments from External
Washing of Company Equipment

Dear Mr. Price:

In the near future we will have to move sands from our Hobbs washbay sumps to an NMOCDD approved disposal facility. I wish to confirm the following:

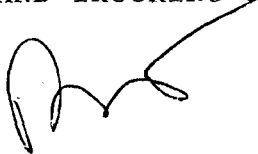
1. There is no use of solvents in our washing operations.
2. Our operating procedures have not changed since our last disposal of said materials.
3. While awaiting moving approval said sediments will be stored in 6-mil plastic lined pits. These pits will be covered with the plastic to prevent rainwater overflow.
4. We feel that the last two tests ran on the sump by independent laboratories are characteristic of the material now on hand, showing no hazardous material present. Copies of these tests are enclosed.

Rowland Trucking Company, Inc. will wait for your written authorization to remove this material.

Thank you for your attention.

Sincerely,

ROWLAND TRUCKING COMPANY, INC.



Pete M. Turner
Manager

PMT/dw

Exhibit 9b

Enclosure



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

August 31, 1992

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

Parabo Inc.
P. O. Box 1499
Hobbs, New Mexico

Re: Movement of sediments from Rowland Trucking Company

Gentlemen:

Pursuant to conversation and correspondence between Rowland Trucking Company and the Oil Conservation Division, this letter is your authorization to accept for disposal the washbay-sand trap sediments from the Rowland Trucking Company Yard. This material includes sediment accumulated from external washing of tank trucks.

The material is to be disposed of at your facility located at Eunice, New Mexico.

The information submitted by Rowland Trucking Company confirms that the materials being sent to Parabo is non-hazardous.

Very truly yours

OIL CONSERVATION DIVISION

Jerry Sexton
Supervisor, District I

cc: Richard Brakey
Chris Eustice
File

Exhibit 10



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, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-200) Rowland Trucking Company, Inc., Pete Turner, P.O. Box 340, Hobbs, New Mexico 88240, has submitted an application for its oil and gas service company located in the NW/4 NW/4, Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCB approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, 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 9:00 a.m. and 4:30 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 only 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 should 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 this plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. REMAY, Director
Journal: June 13, 1995.

STATE OF NEW MEXICO

County of Bernalillo

SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being of the 13th day of July, 1995, and the subsequent consecutive publications on _____, 1995

Bill Tafoya

Sworn and subscribed to before me, a notary public in and for the County of Bernalillo and State of New Mexico, this 13th day of July, 1995

PRICE

\$ 30.09

Statement to come at end of month.

Megan Garcia

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932

OK
MA

RECEIVED

JUN - 9 1995

6142
USFWS - NMESO

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, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-200) - Rowland Trucking Company, Inc., Pete Turner, P.O. Box 340, Hobbs, New Mexico 88240, has submitted an application for its oil and gas service company located in the NW/4 NW/4, Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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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 Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of June, 1995.

NO EFFECT FINDING

The described action will have no effect on listed species,
~~wetlands, or other important wildlife resources.~~

Date June 15, 1995

Consultation # GW95OCD1

Approved by

U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

ROWLAND TRUCKING CO., INC.

ACCOUNT NO.		618 NMED-WATER QUALITY MGEMNT			CHECK NO. [REDACTED]
VOUCHER	INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
16930	FILING FEE GW-200	5/30/95	50.00	50.00	.00
				CHECK TOTAL	50.00

RECEIVED
JUL 07 1995
Environmental Bureau
Oil Conservation Division

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

That the notice which is hereto attached, entitled

Notice Of Publication

And that the cost of publishing said notice is the sum of \$ 37.44 which sum has been (Paid) ~~(Assessed)~~ as Court Costs

which sum has been (Paid), (XXXXXX) as Court Costs

Subscribed and sworn to before me this 16th

Subscribed and sworn to before me this 16th
day of June 19 95

Jean Serier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28 1998

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Páchoe, Santa Fe, New Mexico 87505. Telephone (505)827-7131:

(GW-200) - Rowland Trucking Company, Inc., Pete Turner, P.O. Box 340, Hobbs, New Mexico 88240, has submitted an application for its oil and gas service company located in the NW/4 NW/4, Section 3, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/l. The discharge plan addresses how spills, 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 through 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. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 5th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY
Director

SEAL

Published in the Lovington Daily Leader June 13, 1995.

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



June 6, 1995

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

- 1. Publisher's affidavit in duplicate.**
- 2. Statement of cost (also in duplicate.)**
- 3. CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than June 13, 1995.

Sincerely,

Sally E. Martinez
Administrative Secretary

Attachment

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7485

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

Z 765 963 392



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to	
Lovington, N.M. 88260	
Street and No.	
P.O. Box 177	
P.O. Box and ZIP Code	
Lovington, NM 88260	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



June 6, 1995

ALBUQUERQUE JOURNAL
P. O. Drawer J-T
Albuquerque, New Mexico 87103

ATTN: ADVERTISING MANAGER

RE: NOTICE OF PUBLICATION

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Sincerely,

Sally Martinez
Sally E. Martinez
Administrative Secretary

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VILLAGRA BUILDING - 408 Galisteo
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2040 South Pacheco
Office of the Secretary
827-5850
Administrative Services
827-5825
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

Z 765 963 391



**Receipt for
Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	
Certified Fee	\$
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

NOTICE OF PUBLICATION

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

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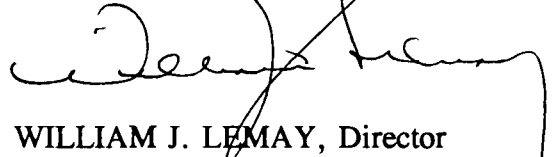
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If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of June, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

SEAL

ROWLAND TRUCKING CO., INC.

ACCOUNT NO.		618 NMED-WATER QUALITY MGEMNT			CHECK NO. [REDACTED]
VOUCHER	INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN
16930	FILING FEE <i>GW-200</i>	5/30/95	50.00	50.00	.00
				CHECK TOTAL	50.00

ROWLAND TRUCKING CO., INC.

P.O. BOX 340
HOBBS, NM 88241
(505) 397-0199

UNITED NEW MEXICO BANK
AT LEA COUNTY
MAIN BRANCH
HOBBS, NM
95-199/1122

CHECK NO.	CHECK DATE	VENDOR NO.
007911	05/30/95	618

PAY
FIFTY AND 00/100 DOLLARS*****

CHECK AMOUNT
\$*****50.00

TO THE ORDER OF NMED-WATER QUALITY MGEMNT
OIL CONSERVATION DIVISION
P O BOX 2088
SANTA FE NM 87504


AUTHORIZED SIGNATURE



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

November 17, 1994

Mr. Bob Calhoon
President
Rowland Trucking Company
418 South Grimes
Hobbs, NM 88240

**Re: Response to Letter of Violation
NM0156241051**

Dear Mr. Calhoon:

The New Mexico Environment Department (NMED) has received your second response to the September 14, 1994 Letter of Violation (LOV). Based on our review of the information submitted, NMED has determined that violations #1 and #5 cited in the referenced LOV have been answered satisfactorily.

If you have any questions, please feel free to contact Mr. Michael Le Scouarnec at (505)827-4308.

Sincerely,

A handwritten signature in cursive script, reading "Coby Muckelroy".

Coby Muckelroy
RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau

cc: Garrison McCaslin, NMED District IV Office
Myra Myers, NMED Hobbs Field Office
Roger Anderson, Oil Conservation Division

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 27, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-765-962-814

Mr. Bob Calhoom
Division Manager
Rowland Trucking Co.
418 Grimes
Hobbs, NM 88240

**RE: Discharge Plan Requirement
Hobbs Facility
Lea County, New Mexico**

Dear Mr. Calhoom:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for the Hobbs Facility located in Lea County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.P of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131

Mr. Bob Calhoom
January 27, 1995
Page 2

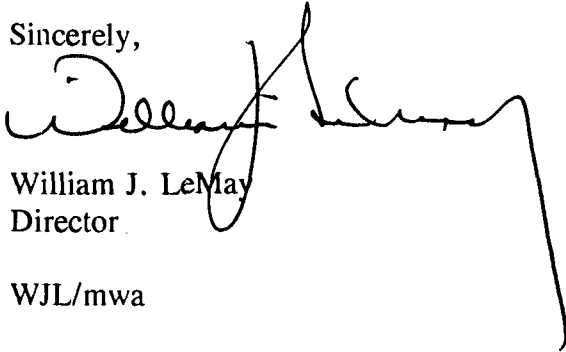
A copy of the regulations have been provided for your convenience. Also provided was an OCD guideline for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of one thousand, three hundred and eighty (\$1380) dollars for oil & gas service companies. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please feel free to contact Mark Ashley at 827-7155 or Roger Anderson at 827-7152.

Sincerely,



William J. LeMay
Director

WJL/mwa

XC: OCD Hobbs Office

Z 765 962 814



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

ENVIRONMENTAL DIVISION
RECEIVED
94 SEP 20 AM 8 50

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

September 14, 1994

Mr. Bob Calhoom (505) 397-0199
Division Manager
Rowland Trucking Co.
418 Grimes
Hobbs, NM 88240

FOR TURNER:
YARD MANAGER

**RE: Letter of Violation
NMD156241051**

Dear Mr. Calhoom:

On June 16, 1994 the New Mexico Environment Department (NMED) conducted a hazardous waste inspection of your facility, Rowland Trucking Co.. Based on our review of the information obtained, NMED has determined that Rowland Trucking Co. has violated the New Mexico Hazardous Waste Management Regulations (HWMR-7). The purpose of this letter is to delineate the violations in writing and to request Rowland Trucking Company's voluntary corrective action.

The violations are:

1. Rowland Trucking Co. has failed to label or clearly mark the sump with the words "hazardous waste". This is a violation of HWMR-7, §301, incorporated federal regulation 40 CFR §262.34(d)(4).
2. Rowland Trucking Co. has failed to post the name and phone number of the emergency coordinator next to the phone. This is a violation of HWMR-7, §301, incorporated federal regulation 40 CFR §262.34(d)(5)(ii)(A).
3. Rowland Trucking Co. has failed to familiarize local hospitals with the properties of hazardous wastes handled at the facility and the type of injuries which could occur. This is a violation of HWMR-7, §301, incorporated federal regulation 40 CFR §262.34(d)(4).
4. Rowland Trucking Co. has not attempted to make the necessary arrangements with local police, fire, and emergency response authorities to familiarize them with hazardous waste characteristics of the facility. This is a violation of HWMR-7, §301, incorporated federal regulation 40 CFR §262.34(d)(4).

Mr. Calhoom
September 14, 1994
Page 2

5. Rowland Trucking Co. has failed to conduct an adequate hazardous waste determination for the sludge in the sump. This is a violation of HWMR-7, §301, incorporated federal regulation 40 CFR §262.11.

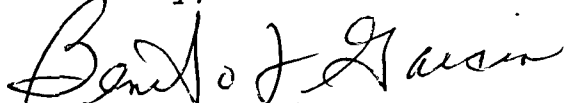
In accordance with §74-4-10 NMSA 1978 (as amended), NMED may: (1) issue a compliance order requiring compliance immediately or within a specified time period or assessing a civil penalty for any past or current violation (of up to \$10,000 per day of noncompliance with each violation), or both; or (2) commence a civil action in district court for appropriate relief, including a temporary or permanent injunction. Any such order issued may include a suspension or revocation of any permit issued by NMED.

At this time, NMED is willing to suspend the enforcement options listed above if Rowland Trucking Co. provides NMED with a satisfactory resolution to the violations or detailed plan of corrective action within ten (10) working days of receipt of this letter. If NMED does not receive such information deemed to be satisfactory, then NMED reserves the right to initiate formal enforcement action.

Any action taken in response to this letter does not relieve Rowland Trucking Co. of its obligation to comply with HWMR-7 in other activities which it conducts, nor does it relieve Rowland Trucking Co. of its obligation to comply with any other applicable laws or regulations.

If you have any questions regarding this letter, please contact Mr. Michael Le Scouarnec at (505)827-4308 or at our address. Please also address to Mr. Le Scouarnec's attention the information you provide in response to this letter.

Sincerely,



Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

BJG:CGM:mcl

cc: Gary McCaslin, NMED District IV Office
Myra Meyers, NMED Hobbs Field Office
Roger Anderson, Oil Conservation Division



State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

BRUCE KING
GOVERNOR

RON CURRY
DEPUTY SECRETARY

October 5, 1994

Mr. Bob Calhoom
Division Manager
Rowland Trucking Co.
418 Grimes
Hobbs, NM 88240

**RE: Letter of Violation
NMD156241051**

Dear Mr. Calhoom:

The Hazardous and Radioactive Materials Bureau has received your response to the September 14, 1994 Letter of Violation issued to your facility. Rowland Trucking has answered to our satisfaction items #2, 3, and 4 of the Letter of Violation. However, items #1 and 5 have not yet been answered satisfactorily in accordance with HWMR-7. Listed hazardous wastes constituents were found in the sump, according to the inspection sampling results, at these levels: methylene chloride 19 ppm, 1.6 ppm, and 19 ppm; naphthalene 6.7 ppm. Attached to this letter is a copy of the analytical results from the sampling event that occurred at your facility the day of the inspection.

An additional ten (10) working days has been provided to resolve the remaining two violations. Regarding violation #5, it is apparent to us that your previous waste analyses were both out of date and incomplete. If you have any questions regarding this letter, please contact Mr. Michael Le Scouarnec at (505)827-4308 or at our address. Please also address to Mr. Le Scouarnec's attention the information you provide in response to this letter.

Sincerely,

A handwritten signature in cursive script that reads "Coby Muckelroy".

Coby Muckelroy
RCRA Insp./Enf. Program Manager
Hazardous and Radioactive Materials Bureau

xc: Gary McCaslin, NMED District IV Office
Myra Meyers, NMED Hobbs Field Office
[Roger Anderson, Oil Conservation Division]

ROWLAND TRUCKING COMPANY

A DIVISION OF

UNICHEM INTERNATIONAL, INC.

SEP 27 AM 9 34

PHONE
[505] 393-7751

P.O. BOX 1499
HOBBS, NEW MEXICO 88241

FAX
[505] 393-7751, Ext. 283

September 24, 1991

Mr. Dave Boyer
NM Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

Dear Mr. Boyer:

Requesting Authorization for Placing Rowland Yard, Wash Bay Sump Dirt into Parabo Facility and Removal of Diesel Contaminated Dirt

Last year Rowland trucking in Hobbs and Eunice cleaned out their wash bay sumps. The dirt removed from these sumps was placed into temporary storage pits (plastic lined and covered) within each yard.

Each of the sumps were tested individual, for the following:

TCLP volatiles and semi-volatiles (RCRA), Ignition, PH, Reactivity,
TCLP metals, TCLP Benzene, Betz, TPH, Cumine, Tri-Methyl
Benzene, Naphthalene, and TOX

These test were run by independent laboratories on November 26, 1990 and April 4, 1991, copies of the results (are enclosed) and show that no hazardous characteristics are present.

Rowland Trucking would like to receive authorization to transfer this dirt from the respective yards to our Parabo facility.

Soil samples from a oil/water separation no longer in use were also tested. The results of this test are enclosed and show that no hazardous characteristics are present. The oil/water separator has been out of service for the past 12 years and is no longer connected to a sewer system. The oil/water separator was associated with a Blow Out Preventer shop no longer in operation. Rowland Trucking would like to remove this soil to Parabo for disposal.

Mr. Dave Boyer
Page 2
September 24, 1991

Rowland Trucking, Eunice Division also has approximately 15 yards of diesel contaminated dirt, which originated from construction of a diesel loading station for our trucks. Tests were run on this dirt at the same time as the others and show no signs of hazardous characteristics (test results enclosed) being as this dirt originated from a site under your jurisdiction, Rowland Trucking would like authorization to dispose of the dirt at Parabo.

Your attention is greatly appreciated.

Sincerely,

ROWLAND TRUCKING COMPANY



Norman D. Denton
Safety/Environmental Coordinator

jd

*Verbal approval
10/9/91*

ROW-1-11-90

UNICHEM INTERNATIONAL INC.
ENVIRONMENTAL INVESTIGATIONS

CHAIN OF CUSTODY RECORD

Laboratory: JORDAN LABS - CORPUS CHRISTI TEXAS

Project No. ROW-1-11-90 Project Name ROWLAND TRUCKING
#143 DIRT SAMPLESSAMPLERS: (Signature) WAYNE PRICE - Wayne Price
NORMAN DENTON - [Signature]

RCRA - CHLORIDES - TELP

IGN, PH, RE-AGT

TELP - METALS

TELP - BENZENE

BETX

TPH

CUMENE -

TRI-METHYLBENZENE

NAPHTHALENE

TOX

REMARKS

Site Number	Date	Time	Sample Identification	Site Description	RCRA - CHLORIDES - TELP	IGN, PH, RE-AGT	TELP - METALS	TELP - BENZENE	BETX	TPH	CUMENE -	TRI-METHYLBENZENE	NAPHTHALENE	TOX
#1	11/26/90	10:21 AM	1 QT - COMPOSITE DIRT - (#1)	ROWLAND - EVIDENCE DIRT PILE - DIESEL SPILL CLEAN-UP		X	X	X	X	X	X	X	X	X
#2	11/26/90	9:48 AM	1 QT COMPOSITE DIRT (#2)	EVIDENCE ROWLAND SUMP - DIRT POTW WASH BAY SUMP		X	X	X	X	X	X	X	X	X
#3	11/26/90	11:10 AM	1 QT COMPOSITE DIRT (#3)	HOBBS - ROWLAND POTW - SUMP		X	X	X	X	X	X	X	X	X
#4	11/26/90	10:15 AM	1 QT COMPOSITE DIRT (+ RUBBER HOSE)	ROWLAND - EVIDENCE OLD RUBBER HOSE		X	X	X	X	X	X	X	X	X

Relinquished by: (Sign.)

WAYNE PRICE [Signature]

Date Time

11/26/90 1:00 PM

Received by: (Sign.)

NORMAN DENTON [Signature]

Relinquished by: (Sign.)

Date Time

Received by: (Sign.)

Relinquished by: (Sign.)

Date Time

Received for Laboratory by: (Sign.)

[Signature] 11/29/90 1350

REMARKS:

COOLED TO 4°C
SAMPLES TAKEN PER SW-846 -
COMPOSITE REPORTS &
PICTURES ON FILE
WITH NORMAN DENTON

PLEASE RETURN COOLER & ICE PACKS

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
DECEMBER 31, 1990

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS
TOXICITY CHARACTERISTIC LEACHING PROCEDURE (TCLP)
GC METHOD 8020

LAB. NO.	SAMPLE IDENTIFICATION	BENZENE MG/L
M28-10007	SAMPLE #1 ROLAND EUNICE DIRT PILE DIESEL SPILL CLEANUP 11-26-90 TCLP EXTRACT	ND
M28-10008	SAMPLE #2 ROWLAND SUMP WASH BAY SUMP DIRT 11-26-90 TCLP EXTRACT	ND
M28-10009	SAMPLE #3 HOBBS-ROWLAND PTOW-SUMP 11-26-90 TCLP EXTRACT	ND
M28-10010	SAMPLE #4 EUNICE OLD RUBBER HOSE 11-26-90 TCLP EXTRACT	ND

ND=NOT DETECTED <0.01 MG/L

NOTE: REGULATORY LEVEL FOR BENZENE IN A TCLP EXTRACT IS 0.5 MG/L

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JANUARY 11, 1991

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #1
ROLAND-EUNICE DIRT PILE-
DIESEL SPILL CLEANUP
10:21 AM 11-26-90

		ANALYSIS DATE
PH -----	7.71	12-04-90
TOTAL PETROLEUM HYDROCARBONS, PPM -----	2790	12-06-90
TOTAL ORGANIC HALIDES, PPM -----	<1	12-04-90
CYANIDE, PPM -----	6.8	12-12-90
TOTAL AVAILABLE SULFIDE, PPM -----	<10	12-06-90
IGNITABILITY -----	SEE NOTE	

RESULTS ON TCLP - EXTRACT

	MG/L	
ARSENIC -----	0.035	12-20-90
BARIUM -----	0.60	12-11-90
CADMIUM -----	0.01	12-15-90
CHROMIUM -----	<0.01	12-15-90
LEAD -----	<0.1	12-15-90
MERCURY -----	<0.001	12-07-90
SELENIUM -----	<0.01	12-20-90
SILVER -----	<0.01	12-15-90

NOTE: MATERIAL IS A SOLID THAT DOES NOT BURN WHEN EXPOSED TO AN OPEN
FLAME AND DOES NOT EXHIBIT THE CHARACTERISTIC OF IGNITABILITY
AS DESCRIBED IN SW-846, SEC.C., 7.1.

LAB. NO. M28-10007

RESPECTFULLY SUBMITTED,


CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
DECEMBER 31, 1990

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #1
ROLAND EUNICE DIRT PILE
DIESEL SPILL CLEANUP
10:21 AM 11-26-90

GC METHOD 8020

LOQ MG/KG		AMOUNT MG/KG
1	BENZENE -----	ND
1	ETHYL BENZENE -----	ND
1	TOLUENE -----	ND
1	XYLENES, TOTAL -----	ND

GC METHOD 8100

LOQ MG/KG		AMOUNT MG/KG
4	CUMENE -----	ND
4	NAPHTHALENE -----	ND
4	TRIMETHYL BENZENES, TOTAL -----	ND

LOQ=LIMIT OF QUANTITATION
ND=NOT DETECTED, <LOQ

RESULTS ON DRY WEIGHT BASIS. PERCENT MOISTURE = 27.1

LAB. NO. M28-10007

RESPECTFULLY SUBMITTED,



CARL F. CROWNVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JANUARY 11, 1991

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #2
EUNICE-ROWLAND SUMP-
WASH BAY SUMP DIRT
9:48 AM 11-26-90

		ANALYSIS DATE
PH -----	7.34	12-04-90
TOTAL PETROLEUM HYDROCARBONS, PPM -----	16300	12-06-90
TOTAL ORGANIC HALIDES, PPM -----	2.1	12-04-90
CYANIDE, PPM -----	3.8	12-12-90
TOTAL AVAILABLE SULFIDE, PPM -----	<10	12-06-90
IGNITABILITY -----	SEE NOTE	

RESULTS ON TCLP - EXTRACT

	MG/L	
ARSENIC -----	0.016	12-20-90
BARUIM -----	1.2	12-11-90
CADMIUM -----	0.01	12-15-90
CHROMIUM -----	<0.01	12-15-90
LEAD -----	<0.1	12-15-90
MERCURY -----	<0.001	12-07-90
SELENIUM -----	<0.01	12-20-90
SILVER -----	<0.01	12-15-90

NOTE: MATERIAL IS A SOLID THAT DOES BURN WHEN EXPOSED TO AN OPEN
FLAME BUT DOES NOT EXHIBIT THE CHARACTERISTIC OF IGNITABILITY
AS DESCRIBED IN SW-846, SEC.C., 7.1.

LAB. NO. M28-10008

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
DECEMBER 31, 1990

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #2
EUNICE ROWLAND SUMP
WASH BAY SUMP DIRT
9:48 AM 11-26-90

GC METHOD 8020

LOQ MG/KG		AMOUNT MG/KG
1	BENZENE -----	ND
1	ETHYL BENZENE -----	ND
1	TOLUENE -----	ND
1	XYLENES, TOTAL -----	1.7

GC METHOD 8100

LOQ MG/KG		AMOUNT MG/KG
4	CUMENE -----	ND
4	NAPHTHALENE -----	13
4	TRIMETHYL BENZENE, TOTAL -----	ND

LOQ=LIMIT OF QUANTITATION
ND=NOT DETECTED, <LOQ

RESULTS ON DRY WEIGHT BASIS. PERCENT MOISTURE = 25.2

LAB. NO. M28-10008

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JANUARY 11, 1991

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #3
HOBBS-ROWLAND POTW-SUMP
11:10 AM 11-26-90

		ANALYSIS DATE
PH -----	6.91	12-04-90
TOTAL PETROLEUM HYDROCARBONS, PPM -----	101000	12-06-90
TOTAL ORGANIC HALIDES, PPM -----	14	12-04-90
CYANIDE, PPM -----	1.5	12-12-90
TOTAL AVAILABLE SULFIDE, PPM -----	<10	12-06-90
IGNITABILITY -----	SEE NOTE	

RESULTS ON TCLP - EXTRACT

	MG/L	
ARSENIC -----	0.008	12-20-90
BARIUM -----	1.1	12-11-90
CADMIUM -----	<0.01	12-15-90
CHROMIUM -----	<0.01	12-15-90
LEAD -----	<0.1	12-15-90
MERCURY -----	<0.001	12-07-90
SELENIUM -----	<0.01	12-20-90
SILVER -----	<0.01	12-15-90

NOTE: MATERIAL IS A SOLID THAT DOES BURN WHEN EXPOSED TO AN OPEN
FLAME BUT DOES NOT EXHIBIT THE CHARACTERISTIC OF IGNITABILITY
AS DESCRIBED IN SW-846, SEC.C., 7.1.

LAB. NO. M28-10009

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
DECEMBER 31, 1990

UNICHEM INTERNATIONAL
P.O. BOX 1499
HOBBS, NEW MEXICO 88240

REPORT OF ANALYSIS

IDENTIFICATION: SAMPLE #3
HOBBS ROWLAND POTW-SUMP
11:10 AM 11-26-90

GC METHOD 8020

LOQ MG/KG		AMOUNT MG/KG
1	BENZENE -----	ND
1	ETHYL BENZENE -----	ND
1	TOLUENE -----	ND
1	XYLENES, TOTAL -----	5.6

GC METHOD 8100

LOQ MG/KG		AMOUNT MG/KG
10	CUMENE -----	ND
10	NAPHTHALENE -----	52
10	TRIMETHYL BENZENES, TOTAL -----	38

LOQ=LIMIT OF QUANTITATION
ND=NOT DETECTED, <LOQ

RESULTS ON DRY WEIGHT BASIS. PERCENT MOISTURE = 25.0

LAB. NO. M28-10009

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

UNICHEM INTERNATIONAL INC.
ENVIRONMENTAL INVESTIGATIONS

CHAIN OF CUSTODY RECORD

Laboratory: LUBBOCK CHRISTIAN UNIVERSITY INSTITUTE of WATER Research

Project No. Project Name

Rowland-91-1 WASH OUT Sumps -

SAMPLERS: (Signature)

Norman D. Denton NORMAN D. DENTON

Site Number Date Time Sample Identification Site Description

# 4	04.04.91	15:45	ROWLAND SUMP - EUNICE	
# 1 (cont)	04.04.91	14:30	ROWLAND SUMP - HOBBS -	
# 2	05-3-91	14:00	EUNICE OLD RUBBER HOSE	
# 3	04.04.91	15:30	EUNICE B.D.P. SHOP Separator	

TECP - VOLVES

-5FMC VOLVES

No. of Containers

REMARKS

Relinquished by: (Sign.)

N. A. Denton

Date Time

05-03-91 15:30

Received by: (Sign.)

Relinquished by: (Sign.)

Date Time

Received by: (Sign.)

Relinquished by: (Sign.)

Date Time

5-6-91

Received for Laboratory by: (Sign.)

E.C. Y.C.

REMARKS:

Please Return TO
ICE CHEST
UNICHEM INT'L.
707 N. LEECH
HOBBS, N. Mex 88240
393-7751



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL, INC.

Attention: Norman D. Denton

P. O. Box 1499

Hobbs, NM 88240

May 21, 1991

Receiving Date: 5/06/91

Sample Type: Rowland Sump

Project No: Rowland - 91-1

Project Location: Eunice

Sampling Date: 4/04/91


Sample Condition: Intact & Cool

Sample Received by: YL

Project Name: Wash Out Sumps

TCLP SEMI-VOLATILES (ppm)	EPA Limit	Y23253 #4 Rowland Sump	Y23253 Corrected	Detection Limit	QC	%P	%EA	%IA
Chlordane	0.03	<0.005	<0.005	0.005	10.0	100	NR	100
m-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	83	94
o-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	NR	90
p-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	83	94
Total Cresol	200.0	<0.01	<0.01	0.01	0.06	100	NR	93
1,4-Dichlorobenzene	7.5	<0.01	<0.01	0.01	0.1	100	50	100
2,4-Dinitrotoluene	0.13	<0.13	<0.13	0.01	0.1	100	106	116
Heptachlor (and its hydroxide)	0.008	<0.0005	<0.0005	0.0005	20.0	100	NR	95
Hexachloro-1,3-butadiene	0.5	<0.005	<0.005	0.005	0.2	100	96	100
Hexachlorobenzene	0.13	0.055	0.055	0.001	0.1	100	146	88
Hexachloroethane	3.0	<0.01	<0.01	0.01	0.1	100	77	84
Nitrobenzene	2.0	<0.05	<0.05	0.05	0.1	100	101	109
Pyridine	5.0	<0.1	<0.1	0.1	0.1	100	NR	116
Pentachlorophenol	100.0	0.256	0.256	0.1	0.4	100	NR	85
2,4,5-Trichlorophenol	400.0	0.07	0.07	0.01	0.1	100	87	94
2,4,6-Trichlorophenol	2.0	0.09	0.09	0.05	0.1	100	101	106
Endrin	0.02	<0.005	<0.005	0.005	20.0	100	NR	99
Lindane	0.4	<0.05	<0.05	0.05	20.0	100	NR	100
Methoxychlor	10.0	<1.0	<1.0	1.0	20.0	100	NR	100
2,4-D	10.0	<0.01	<0.01	0.01	2.0	100	NR	100
2,4,5-T-P (Silvex)	1.0	<0.02	<0.02	0.02	2.0	100	NR	100
Toxaphene	0.5	<0.1	<0.1	0.1	2.0	100	NR	100

METHODS: EPA SW 846-8270, 1311.


Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

5-21-91
Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL, INC.

Attention: Norman D. Denton

P. O. Box 1499

Hobbs, NM 88240

May 21, 1991

Receiving Date: 5/06/91

Sample Type: Rowland Sump

Project No: Rowland - 91-1

Project Location: Eunice

Sampling Date: 4/04/91

Sample Condition: Intact & Cool

Sample Received by: YL

Project Name: Wash Out Sumps

TCLP VOLATILES (ppm)	EPA LIMIT	Y23253 #4 Rowland Sump	Y23253 Corrected	Detection Limit	QC	%P	%EA	%IA
Benzene	0.5	<0.002	<0.002	0.002	1.06	100	125	106
Carbon Tetrachloride	0.5	<0.002	<0.002	0.002	1.03	100	110	103
Chlorobenzene	100.0	<0.002	<0.002	0.002	1.10	100	132	110
Chloroform	6.0	<0.02	<0.02	0.02	1.08	100	138	108
1,2-Dichloroethane	0.5	<0.002	<0.002	0.002	0.97	100	142	97
1,1-Dichloroethylene	0.7	<0.002	<0.002	0.002	1.04	100	106	104
Methyl ethyl ketone	200.0	<0.02	<0.02	0.02	1.00	100	156	100
1,4-Dichlorobenzene	7.5	<0.002	<0.002	0.002	1.19	100	131	119
Tetrachloroethylene	0.7	<0.002	<0.002	0.002	1.09	100	108	109
Trichloroethylene	0.5	<0.002	<0.002	0.002	1.05	100	118	105
Vinyl chloride	0.2	<0.002	<0.002	0.002	1.00	100	110	100

METHODS: EPA SW 846-3810 USING AUTOMATED HEAD SPACE; EPA SW 846-8020, 1311.

B3

Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

5-21-91

Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL, INC.

Attention: Norman D. Denton

P. O. Box 1499

Hobbs, NM 88240

May 21, 1991

Receiving Date: 5/06/91

Sample Type: Rowland Sump

Project No: Rowland - 91-1

Project Location: Hobbs

Sampling Date: 4/04/91

Sample Condition: Intact & Cool

Sample Received by: YL

Project Name: Wash Out Sumps

TCLP SEMI-VOLATILES (ppm)	EPA Limit	Y23254 #1 Rowland Sump	Y23254 Corrected	Detection Limit	QC	%P	%EA	%IA
Chlordane	0.03	<0.005	<0.005	0.005	10.0	100	NR	100
m-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	95	94
o-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	NR	90
p-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	95	94
Total Cresol	200.0	<0.01	<0.01	0.01	0.06	100	NR	93
1,4-Dichlorobenzene	7.5	<0.01	<0.02	0.01	0.1	100	65	100
2,4-Dinitrotoluene	0.13	<0.01	<0.01	0.01	0.1	100	99	116
Heptachlor (and its hydroxide)	0.008	<0.0005	<0.0005	0.0005	20.0	100	NR	95
Hexachloro-1,3-butadiene	0.5	<0.005	<0.005	0.005	0.2	100	91	100
Hexachlorobenzene	0.13	0.055	0.055	0.001	0.1	100	108	88
Hexachlorooethane	3.0	<0.01	<0.01	0.01	0.1	100	89	84
Nitrobenzene	2.0	<0.05	<0.05	0.05	0.1	100	87	109
Pyridine	5.0	<0.1	<0.1	0.1	0.1	100	NR	116
Pentachlorophenol	100.0	<0.1	<0.1	0.1	0.4	100	NR	85
2,4,5-Trichlorophenol	400.0	0.24	0.24	0.01	0.1	100	75	94
2,4,6-Trichlorophenol	2.0	0.08	0.08	0.05	0.1	100	100	106
Endrin	0.02	<0.005	<0.005	0.005	20.0	100	NR	99
Lindane	0.4	<0.05	<0.05	0.05	20.0	100	NR	100
Methoxychlor	10.0	<1.0	<1.0	1.0	20.0	100	NR	100
2,4-D	10.0	<0.01	<0.01	0.01	2.0	100	NR	100
2,4,5-T-P (Silvex)	1.0	<0.02	<0.02	0.02	2.0	100	NR	100
Toxaphene	0.5	<0.1	<0.1	0.1	2.0	100	NR	100

METHODS: EPA SW 846-8270, 1311.

Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

5-21-91

Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900


ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL, INC.
Attention: Norman D. Denton
P. O. Box 1499
Hobbs, NM 88240

May 21, 1991
Receiving Date: 5/06/91
Sample Type: Rowland Sump
Project No: Rowland - 91-1
Project Location: Hobbs

Sampling Date: 4/04/91
Sample Condition: Intact & Cool
Sample Received by: YL
Project Name: Wash Out Sumps

TCLP VOLATILES (ppm)	EPA LIMIT	Y23254 #1 Rowland Sump	Y23254 Corrected	Detection Limit	QC	%P	%EA	%IA
Benzene	0.5	<0.002	<0.002	0.002	1.06	100	114	106
Carbon Tetrachloride	0.5	0.120	0.130	0.002	1.03	100	93	103
Chlorobenzene	100.0	<0.002	<0.002	0.002	1.10	100	89	110
Chloroform	6.0	<0.02	<0.02	0.02	1.08	100	130	108
1,2-Dichloroethane	0.5	<0.002	<0.002	0.002	0.97	100	138	97
1,1-Dichloroethylene	0.7	<0.002	<0.002	0.002	1.04	100	104	104
Methyl ethyl ketone	200.0	<0.02	<0.02	0.02	1.00	100	162	100
1,4-Dichlorobenzene	7.5	0.258	0.370	0.002	1.19	100	70	119
Tetrachloroethylene	0.7	<0.002	<0.002	0.002	1.09	100	70	109
Trichloroethylene	0.5	<0.002	<0.002	0.002	1.05	100	99	105
Vinyl chloride	0.2	<0.002	<0.002	0.002	1.00	100	109	100

METHODS: EPA SW 846-3810 USING AUTOMATED HEAD SPACE; EPA SW 846-8020, 1311.



Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

5-21-91

Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900

ANALYTICAL RESULTS FOR
UNICHEM INTERNATIONAL, INC.
Attention: Norman D. Denton
P. O. Box 1499
Hobbs, NM 88240


*B.O.P.
BLOW OUT
PREVENTER
SHOP*

May 21, 1991
Receiving Date: 5/06/91
Sample Type: B.D.P. Shop Separator ←
Project No: Rowland - 91-1
Project Location: Eunice

Sampling Date: 4/04/91
Sample Condition: Intact & Cool
Sample Received by: YL
Project Name: Wash Out Sumps

TCLP SEMI-VOLATILES (ppm)	EPA Limit	Y23256 #3 B.D.P. Shop Separator	Y23256 Corrected	Detection Limit	QC	%P	%EA	%IA
Chlordane	0.03	<0.005	<0.005	0.005	10.0	100	NR	100
m-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	80	94
o-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	NR	90
p-Cresol	200.0	<0.01	<0.01	0.01	0.2	100	80	94
Total Cresol	200.0	<0.01	<0.01	0.01	0.06	100	NR	93
1,4-Dichlorobenzene	7.5	<0.01	<0.02	0.01	0.1	100	56	100
2,4-Dinitrotoluene	0.13	<0.13	<0.13	0.01	0.1	100	102	116
Heptachlor (and its hydroxide)	0.008	<0.0005	<0.0005	0.0005	20.0	100	NR	95
Hexachloro-1,3-butadiene	0.5	<0.005	<0.005	0.005	0.2	100	NR	100
Hexachlorobenzene	0.13	0.06	0.06	0.001	0.1	100	108	88
Hexachloroethane	3.0	<0.01	<0.01	0.01	0.1	100	74	84
Nitrobenzene	2.0	<0.05	<0.05	0.05	0.1	100	94	109
Pyridine	5.0	<0.1	<0.1	0.1	0.1	100	NR	116
Pentachlorophenol	100.0	0.343	0.343	0.1	0.4	100	NR	85
2,4,5-Trichlorophenol	400.0	0.09	0.10	0.01	0.1	100	85	94
2,4,6-Trichlorophenol	2.0	<0.05	<0.05	0.05	0.1	100	70	106
Endrin	0.02	<0.005	<0.005	0.005	20.0	100	NR	99
Lindane	0.4	<0.05	<0.05	0.05	20.0	100	NR	100
Methoxychlor	10.0	<1.0	<1.0	1.0	20.0	100	NR	100
2,4-D	10.0	<0.01	<0.01	0.01	2.0	100	NR	100
2,4,5-T-P (Silvex)	1.0	<0.02	<0.02	0.02	2.0	100	NR	100
Toxaphene	0.5	<0.1	<0.1	0.1	2.0	100	NR	100

METHODS: EPA SW 846-8270, 1311.


Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

5-21-91
Date



Lubbock Christian University Institute of Water Research

5601 West 19th Street • Lubbock, Texas 79407 • (806) 796-8900

ANALYTICAL RESULTS FOR UNICHEM INTERNATIONAL, INC.

Attention: Norman D. Denton
P. O. Box 1499
Hobbs, NM 88240

May 21, 1991

Receiving Date: 5/06/91

Sample Type: B.D.P. Shop Separator ← *B.D.P.*

Project No: Rowland - 91-1

Project Location: Eunice

Sampling Date: 4/04/91

Sample Condition: Intact & Cool

Sample Received by: YL

Project Name: Wash Out Sumps

TCLP VOLATILES (ppm)	EPA LIMIT	Y23256 #3 B.D.P. Shop Separator	Y23256 Corrected	Detection Limit	QC	%P	%EA	%IA
Benzene	0.5	<0.002	<0.002	0.002	1.06	100	120	106
Carbon Tetrachloride	0.5	<0.002	<0.002	0.002	1.03	100	110	103
Chlorobenzene	100.0	<0.002	<0.002	0.002	1.10	100	137	110
Chloroform	6.0	<0.02	<0.02	0.02	1.08	100	128	108
1,2-Dichloroethane	0.5	<0.002	<0.002	0.002	0.97	100	138	97
1,1-Dichloroethylene	0.7	<0.002	<0.002	0.002	1.04	100	106	104
Methyl ethyl ketone	200.0	<0.02	<0.02	0.02	1.00	100	165	100
1,4-Dichlorobenzene	7.5	<0.002	<0.002	0.002	1.19	100	143	119
Tetrachloroethylene	0.7	<0.002	<0.002	0.002	1.09	100	126	109
Trichloroethylene	0.5	<0.002	<0.002	0.002	1.05	100	115	105
Vinyl chloride	0.2	<0.002	<0.002	0.002	1.00	100	106	100

METHODS: EPA SW 846-3810 USING AUTOMATED HEAD SPACE; EPA SW 846-8020, 1311.

BS

Director, Dr. Blair Leftwich

Asst. Dir., Dr. Bruce McDonell

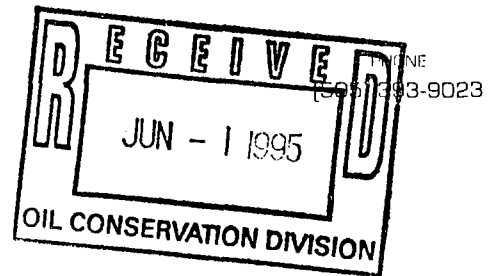
5-21-91

Date

ROWLAND TRUCKING COMPANY

PHONE
[505] 397-4994

418 SOUTH GRIMES
HOBBS, NEW MEXICO 88240



OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505

GW-200

ATTN: ENVIRONMENTAL DIVISION
Mr. Mark Ashley

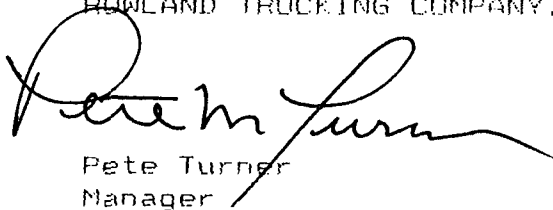
Dear Sir:

Please find our application for an Oilfield Service Facilities
- Discharge Plan enclosed. I hope this will meet with your
approval.

If we can be of any further assistance, please call at
anytime. Our filing fee of fifty dollars (\$50) is attached as
directed.

Very truly yours,

ROWLAND TRUCKING COMPANY, INC.


Pete Turner
Manager

pt/lg

I hereby acknowledge receipt of check No. dated 5/30/95,
or cash received on 7/7/95 in the amount of \$ 5000
from Ron Land Trucking
for Hables

Received in ASD by: (signature) Date: 7-11-95

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

CHECK NO.	CHECK DATE	VENDOR NO.
007911	05/30/95	618

PAY
FIFTY AND 00/100 DOLLARS*****

*****50.00

TO THE NMED-WATER QUALITY MGE MNT
ORDER OIL CONSERVATION DIVISION
OF P O BOX 2088
SANTA FE NM 87504

AUTHORIZED SIGNATURE