

GW - 202

INSPECTIONS & DATA



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

May 28, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-869-966

Mr. Gerald Phillips, President
Pro-Kem, Inc.
P.O. Box 1506
Lovington, New Mexico 88260

Re: Inspection Report
Pro-Kem Facility, GW-202
Lovington, New Mexico

Dear Mr. Phillips:

The New Mexico Oil Conservation Division (OCD) would like to thank you and Robert Allen, Safety & Environmental Solutions, Inc., for your cooperation during the April 8, 1998 inspection of the Pro-Kem, Inc. (PKI) Lovington facility located in Lovington, New Mexico. Comments from the inspection conducted are as follows:

1. **Remediation:** *Source removal and Stabilization*

Inspection of the remediation progress of hydrocarbon contaminated soils excavated from the previously abandoned caliche pit was made (see photos 1, 2, 3 and 4). Stockpiled excavated soils had visible staining with hydrocarbon odors. Continued aeration of soils will be necessary to effect a reduction of hydrocarbon concentrations within the soil piles. Where ever possible soils should be turned to provided better aeration for remedial acceleration.

2. **Drum Storage:** *All drums that contain materials other than fresh water must be stored on an impermeable pad (i.e. concrete, asphalt, or other suitable containment) with curbing. All empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad with curbing.*

Empty drums should be stored in a horizontal position with the bungs in place.

Mr. Gerald Phillips

May 28, 1998

Page 2

3. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the appropriate OCD District Office.

Once again, thank you for your time during our recent visit to your facility, and for your commitment to operate in an environmentally conscience manner. If you have any questions, please call me at (505) 827-7156.

Sincerely,



W. Jack Ford, C.P.G.
Geologist

xc: Robert Allen, Safety & Environmental Solutions, Inc.
OCD Hobbs Office

Z 357 869 966

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	<i>Gerald Phillips</i>
Street & Number	<i>Pro-Kem</i>
Post Office, State, & ZIP Code	<i>Lodington</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>GW-202</i>

PS Form 3800, April 1995

PRO-KEM, INC. GW-202
(PHOTOS BY OCD)



PHOTO NO. 1

DATE: 4/8/98



PHOTO NO. 2

DATE: 4/8/98

PRO-KEM, INC. GW-202
(PHOTOS BY OCD)



PHOTO NO. 3

DATE: 4/8/98



PHOTO NO. 4

DATE: 4/8/98

CONSERVATION DIVISION
RECEIVED

CC JERRY TETTON

PAUL SANCHEZ

UNOC

'95 NOV 2 AM 8 52 NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION
CLASSIFICATION
FACILITY
HOURS
QUARTER
HOURS

Name WAYNE PRICE Date 10/27/95 Miles _____ District I
Time of Departure 7 AM Time of Return 4 PM Car No. G 04

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature [Signature]

PRO-KEM LOVINGTON NM YARD AP# GW-202
OLD PIT SITE INVESTIGATION -

ENVIRONMENTAL CONTRACTOR (SAFETY SOLUTIONS -
BOB ALLEN) - DUG 4 SAMPLE TRENCH
X 10-12' DEEP - ALL TRENCHES WERE
CONTAMINATED WITH HEAVY B.S.O.W.

SITE APPEARS TO BE X 130' X 100' X 12'
PRO-KEM TO SUBMIT A PHASE II
WORK PLAN TO UNOC SANTA FE!

RECEIVED

NOV 2 1995

TOOK PICTURES (5)

Environmental Bureau
Oil Conservation Division

Mileage

UIC _____

RFA _____

Other _____

Per Diem

UIC _____

RFA _____

Other _____

Hours

UIC _____

RFA _____

Other _____

TYPE INSPECTION
PERFORMED

H = Housekeeping
P = Plugging
C = Plugging Cleanup
T = Well Test
R = Repair/Workover
F = Waterflow
M = Mishap or Spill
W = Water Contamination
O = Other

INSPECTION
CLASSIFICATION

U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)
R = Inspections relating to Reclamation Fund Activity
O = Other - Inspections not related to injection or The Reclamation Fund
E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

NATURE OF SPECIFIC WELL
OR FACILITY INSPECTED

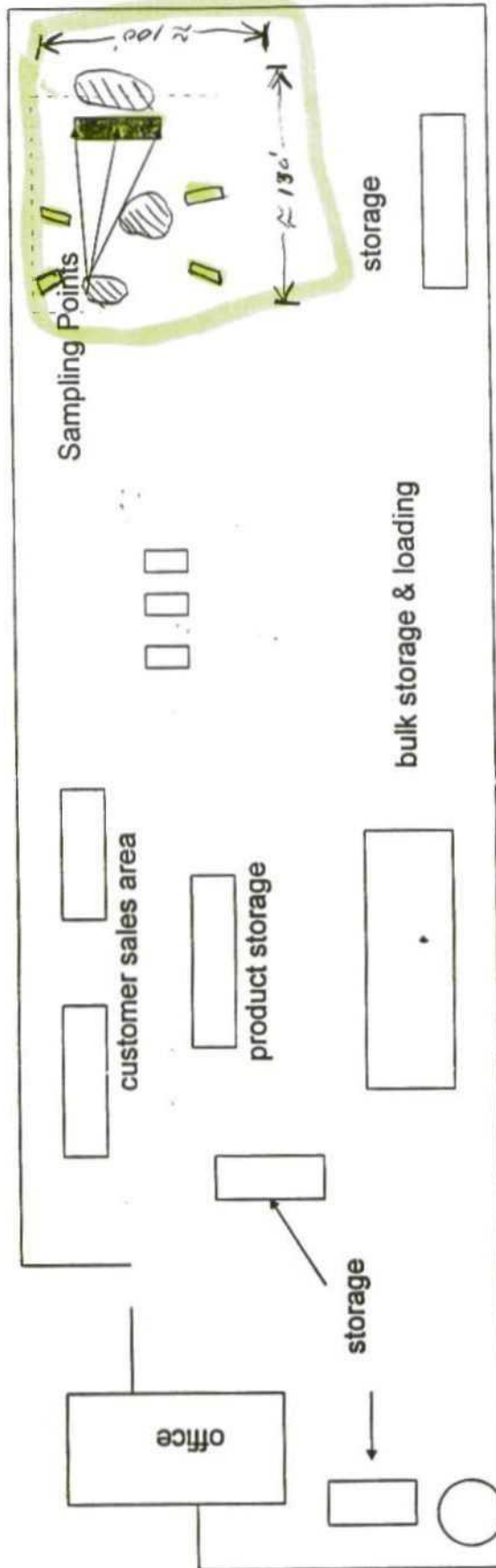
D = Drilling
P = Production
I = Injection
C = Combined prod. inj. operations
S = SWD
U = Underground Storage
G = General Operation
F = Facility or location
M = Meeting
O = Other

PROKEM. INC. SITE PLAN

not to scale

RECEIVED
OCT 13 1995
UCC HOURS
OFFICE

Highway 18



HAZARDOUS

DIRT PILES

Proposed
Sample Trench

Exhibit A

Abandoned Pit

10/27/95
12:30 PM
BY WAYNE PRICE

PKL 1085

PRO-KEM LOVINGTON YARD
GW-202

OCTOBER 27, 1995

~ 12:30 PM

BY WAYNE PRICE

OLD PIT INVESTIGATION
LOOKING SOUTHEAST
NEG'S 543833



2085

LOOK NORTH
CONTAMINATED DIRT
FROM SITE INVESTIGATION
HOLDS



3085

LOOK EAST



PHL 9 of 11

9
LOOK EAST



PHL

5 of 5

SOUTH EXCAVATED
HOLE - SHOWS OILY SLUDGE
SEEPING OUT OF SIDEWALL











PRO-KEM, Inc.

GW-202 (PHOTOS BY OCD)

(wayne
prince)



PHOTO NO. 1

DATE: 10/27/95



PHOTO NO. 3

DATE: 10/27/95



PHOTO NO. 4

DATE: 10/27/95



PHOTO NO. 5

DATE: 10/27/95