

**GW - 206**

**PERMITS,  
RENEWALS,  
& MODS**

**CLOSED**

## ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-206

KEY ENERGY SERVICES, INC.

01 NOV 19 PM 2:41

HOBBS SERVICE FACILITY

## DISCHARGE PLAN APPROVAL CONDITIONS

(October 29, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Key Energy Services, Inc. Commitments: Key Energy Services, Inc. will abide by all commitments submitted in the discharge plan renewal application dated August 3, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. 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.
5. 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.
6. 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.
7. 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.

RECEIVED

DEC 10 2001  
Environmental Bureau  
Oil Conservation Division

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. 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.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a Key Energy Services, Inc.'s representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Key Energy Services, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Key Energy Services, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

KEY ENERGY SERVICES, INC.

by Tracy L. S.  
Title

Mr. Tracy Stockton  
GW-206 Hobbs Service Facility  
October 29, 2001  
Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **July 21, 2005**, and Key Energy Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Key Energy Services, Inc. will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the Hobbs Service Facility.

The discharge plan application for the Key Energy Services, Inc. Hobbs Service Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The OCD has received the filing fee.

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

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Hobbs Office

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT** *FORD* *OLD*  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

7001 1940 0004 3929 6856

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To *T. Stockton*  
Street, Apt. No.;  
or PO Box No. *Key Em*  
City, State, ZIP+ 4 *GW-206*



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

October 29, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 3929 6856**

Mr. Tracy Stockton  
Key Energy Services, Inc.  
720 Texaco Road  
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal Approval GW-206**  
**Key Energy Services, Inc.**  
**Hobbs Service Facility**  
**Lea County, New Mexico**

Dear Mr. Stockton:

The ground water discharge plan renewal GW-206 for the Key Energy Services, Inc. Hobbs Service Facility located in the NW/4 NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, is **hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on May 19, 1995 and approved July 21, 1995. The discharge plan renewal application, dated August 3, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Key Energy Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-206  
KEY ENERGY SERVICES, INC.  
HOBBS SERVICE FACILITY  
DISCHARGE PLAN APPROVAL CONDITIONS  
(October 29, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for oil and gas service companies equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Key Energy Services, Inc. Commitments: Key Energy Services, Inc. will abide by all commitments submitted in the discharge plan renewal application dated August 3, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. 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.
5. 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.
6. 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.
7. 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.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. 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.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected by a Key Energy Services, Inc.'s representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the Hobbs Service Facility are discontinued for a period in excess of six months. Prior to closure of the Hobbs Service Facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

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

Accepted:

KEY ENERGY SERVICES, INC.

by \_\_\_\_\_  
Title

NOTICE OF PUBLICATION

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

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

**(GW-206) – Key Energy Services, Inc., Mr. Tracy Stockton, 720 Texaco Road, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Key's Construction & Lease Service Yard (formerly Cobra Hobbs facility) located in the NW/4 NW/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 50 feet with a total dissolved solids ranging from less than 1000 mg/l to over 3000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

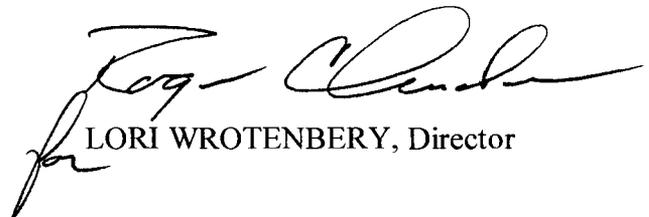
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 19th day of September, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL

## OIL CONSERVATION DIVISION

July 21, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-963-096**

Mr. Harold Ogle  
Compliance Manager  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, NM 88240-2040

**RE: Approval of Discharge Plan GW-206  
Cobra Industries, Inc., Hobbs Facility  
Lea County, New Mexico**

Dear Mr. Ogle:

The discharge plan GW-206 for the Cobra Industries, Inc. Facility located in NW/4 NW/4 Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, is hereby **approved** subject to the conditions contained in the enclosed attachment. The discharge plan consists of the application and its contents dated May 19, 1995, and the additional information received from Cobra Industries, Inc. dated July 6, 1995.

The discharge plan application was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Cobra Industries, Inc. of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

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

Mr. Harold Ogle  
July 21, 1995  
Page 2

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

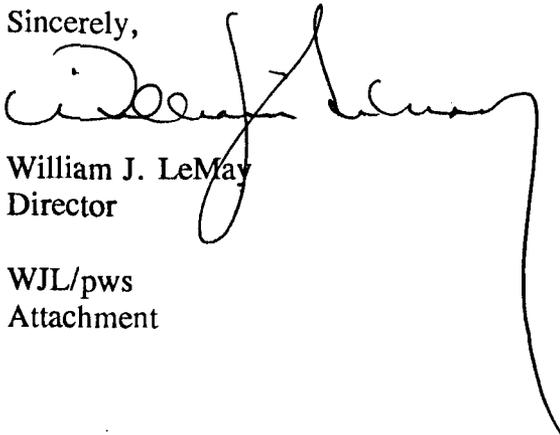
Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire July 21, 2000, and you should submit an application for renewal in six (6) months before this date.

The discharge plan application for the Cobra Industries, Inc. Facility 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 dollars (\$50) plus the flat fee of one thousand three-hundred and eighty dollars (\$1380.00) for Service company facilities.

The \$50 filing fee has been received by the OCD. The flat fee for an approved discharge plan has not been received by the OCD. The flat fee check should be submitted to the **NMED - Water Quality Management** through the NMOCD office in Santa Fe, New Mexico.

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

Sincerely,



William J. LeMay  
Director

WJL/pws  
Attachment

xc: Wayne Price

Mr. Harold Ogle  
July 21, 1995  
Page 3

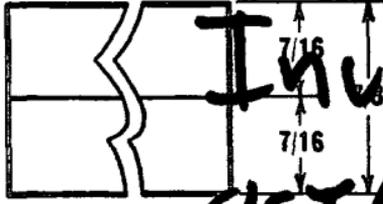
**ATTACHMENT TO DISCHARGE PLAN GW-206 APPROVAL**  
**Cobra Industries Inc. - Hobbs**  
**DISCHARGE PLAN REQUIREMENTS**  
July 21, 1995

1. Payment of Discharge Plan Fees: The one thousand three hundred and eighty dollar (\$1380) flat fee shall be submitted upon receipt of this approval. The flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the five (5) year duration of the plan, with the first payment due upon receipt of this approval.
2. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain 1 1/3 times the capacity of the tank or 1 1/3 times the volume of all interconnected tanks.
3. Drum Storage: All drums will be stored on pad and curb type containment.
4. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
5. Modifications: All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.
6. Waste Disposal:
  - A. All wastes shall be disposed of at an NMOCD approved facility.
  - B. Only oilfield exempt wastes can be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an NMOCD approved facility.

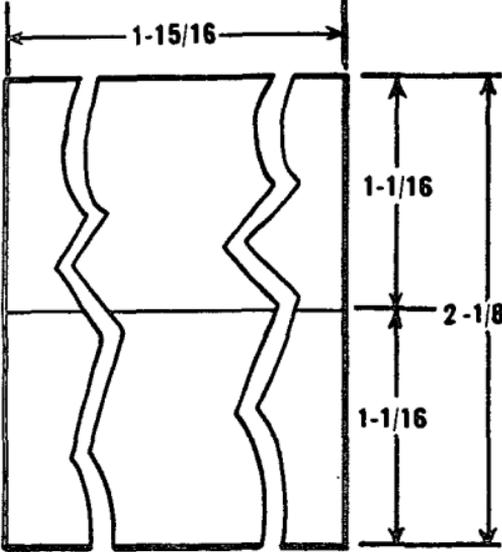
# PHOTOS

- Sump/LEAK

METAL TABS-(TOP TAB & END TAB)  
Nos. X2, X3, X4, X5



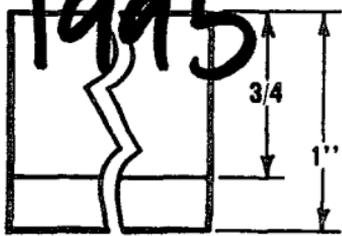
HORIZONTAL STYLE METAL TABS  
No. X6



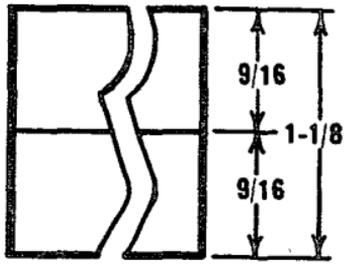
DOUBLE INSERTABLE VINYL TABS  
Nos. X48 thru X55 ( $3/8''$  Exp.)



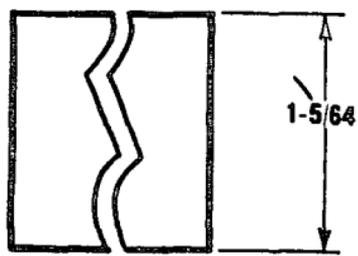
Nos. X60 thru X62 ( $3/4''$  Exp.)  
Nos. X64 thru X67 ( $1''$  Exp.)



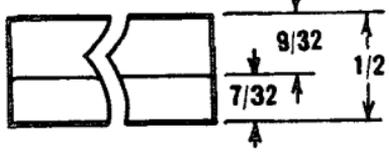
FLEX-I-VISION® VINYL TABS  
CH2, CH3 & 68670



FLEX-I-VISION® METAL TABS  
Nos. H2 & H3



RITE-ANGLE VINYL TABS  
Nos. X25 thru X35 ( $3/8''$  Exp.)



Investigation  
OCT/NOV 1995

INSERT WIDTH (LENGTH): Refer to Current Smead Catalog or Specify on Order



≈ MIDDLE of SUMP VASLT  
SHOWS WHERE LEAK WAS  
HOLE LARGE ENOUGH TO ALLOW  
RACHTY/ROLS TO GO THROUGH!

CI 17 of 9

10-27-95



CH 944

11/1/55

N

15' DEEP

BELOW SAND  
TOP

CONCRETE

N



OILY CONTAMINATION ON  
SIDE OF CONCRETE SUMP

CI 549

10-27-95



CI 249

10-27-95



CH 109

COBRA-HOBBS  
YARD

LEAK SUMP  
SOIL INVESTIGATION

11/1/95

~ 2:30 PM

BY WAYNE FRIEF

NEG'S

197735



CI 30639  
10-27-95

WASH BAY SUMP FLOOR  
EXCAVATED FOR INVESTIGATION  
OF LEAKING SUMP



# 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 5, 2007

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

RE: DISCHARGE PERMIT GW206  
KEY ENERGY SERVICES, INC. – HOBBS SERVICE FACILITY  
SECTION 4, TOWNSHIP 19 SOUTH, RANGE 38 EAST  
LEA COUNTY

Dear Mr. Patterson:

Thank you for your prompt response of December 19, 2006, to my request for information on the status of your Hobbs Service Facility (GW206). I understand that Key Energy sold its Hobbs Service Facility on February 3, 2005 to GCI of Artesia, a non Oil and Gas industry company. Therefore; Discharge Permit GW206 should be closed and not transferred. In order to properly close your permit and to comply with Permit Condition 16 (see attachment), we request that you send us a signed statement that to the best of your knowledge Key Energy Services had no releases and that all waste was properly disposed of at its Hobbs Service Facility at closure. Please include photographs of the site to document the condition of the facility at closure. After we receive this information from you, OCD will formally close out Discharge Permit GW206.

If you have any questions, please contact me at 505-476-3488.

Sincerely,

Glenn von Gonten  
Senior Hydrologist  
Attachment (1)

cc: Mr. Larry Johnson, OCD Hobbs District Office

**VonGonten, Glenn, EMNRD**

**From:** VonGonten, Glenn, EMNRD  
**Sent:** Tuesday, December 19, 2006 8:37 AM  
**To:** 'Patterson, Bob'  
**Subject:** RE: Discharge Plan Permit Renewal (GW206) Hobbs Service Facility (Old Cobra Facility)

Thanks.

Glenn

---

**From:** Patterson, Bob [mailto:bpatterson@keyenergy.com]  
**Sent:** Tuesday, December 19, 2006 6:57 AM  
**To:** VonGonten, Glenn, EMNRD  
**Subject:** RE: Discharge Plan Permit Renewal (GW206) Hobbs Service Facility (Old Cobra Facility)

As per your request:

We sold construction on Feb.3 2005 to GCI, PO Box 827 Artesia NM 88210

Bill Sweat is the President

505-748-1230

↳ 01/05/2007 - Fax No.

**Bob Patterson**

-----Original Message-----

**From:** VonGonten, Glenn, EMNRD [mailto:Glenn.VonGonten@state.nm.us]  
**Sent:** Monday, December 18, 2006 5:06 PM  
**To:** Patterson, Bob  
**Subject:** Discharge Plan Permit Renewal (GW206) Hobbs Service Facility (Old Cobra Facility)

Mr Patterson:

I understand from our phone conversation that Key Energy no longer operates its former Hobbs Service Facility located at 720 Texaco Road, Hobbs, NM. Please respond to this email for our records. Please indicate the date that the property transfer occurred. OCD would also appreciate it if you could provide with a contact with Sweat Construction. For future reference and your records, I am including the following email message and relevant pdf attachments that OCD is sending out to facilities with expired permits.

Thanks for your assistance.

Glenn von Gonten

The Oil Conservation Division's (OCD) records indicate that your discharge plan has expired. New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. You may be operating without a permit. Please submit a permit renewal application with a filing fee (20.6.2.3114 NMAC) of \$100.00 by December 31, 2006. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone at 505-476-3488 or email [glenn.vongonten@state.nm.us](mailto:glenn.vongonten@state.nm.us) if you have any questions regarding this matter.

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

March 9, 2006

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7000-1670-0012-5357-6952**

Mr. Tracy Stockton  
Key Energy Services, Inc.  
720 Texaco Road  
Hobbs, New Mexico 88240

**RE: Discharge Permit GW-206  
Key Energy Services, Inc.  
Hobbs Service Facility  
Lea County, New Mexico**

Dear Mr. Stockton:

The discharge permit GW-206 for the Hobbs Service Facility (formerly Cobra) located in the NW/4 NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, **expired on July 21, 2005**. Permits for operation of oilfield service companies are required and issued pursuant to 20.6.2.3104 NMAC.

An application for renewal of your permit must be received in this office no later than April 15, 2006.

If you have any questions, you may contact me at (505) 476-3489 or [jack.ford@state.nm.us](mailto:jack.ford@state.nm.us).

NEW MEXICO OIL CONSERVATION DIVISION

W. Jack Ford, C.P.G.  
Environmental Bureau

Copy: NMOCD, Hobbs



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

March 9, 2006

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7000-1670-0012-5357-6952**

Mr. Tracy Stockton  
Key Energy Services, Inc.  
720 Texaco Road  
Hobbs, New Mexico 88240

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Key Energy Services, Inc.  
Hobbs Service Facility  
Lea County, New Mexico**

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NEW MEXICO OIL CONSERVATION DIVISION

W. Jack Ford, C.P.G.  
Environmental Bureau

Copy: NMOCD, Hobbs

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 11/06/2001  
or cash received on \_\_\_\_\_ in the amount of \$ 1700<sup>00</sup>  
from KEY ENERGY SERVICES INC  
for HOBBS FACILITY (OLD COBRA) 6W-206  
Submitted by: WAYNE PRICE (Family Name) Date: 12/10/01 OSP No.  
Submitted to ASD by: [Signature] Date: 12/10/01  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal   
Modification \_\_\_\_\_ Other \_\_\_\_\_  
Organization Code 521.07 Applicable FY 2001

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  
6 Desta Drive, Suite 4400  
Midland, Texas 79705  
(915)571-7320

PNC BANK, NATIONAL ASSOCIATION  
JEANETTE, PA 8-9/430

Check Date 11/06/2001 No. [REDACTED]

**\$ 1,700.00**  
DOLLAR PERIOD ZERO ZERO

PAY One Thousand Seven Hundred Dollars and No Cent

TO THE ORDER OF NM ENRGY, MNRLS, & NAT RESC DEPT  
OIL CONSERVATION DIVISION  
1220 SOUTH ST. FRANCIS DRIVE  
SANTA FE NM 87504

6W-206

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

[REDACTED]

THE SANTA FE  
**NEW MEXICAN**

Founded 1849

NM OIL CONSERVATION DIVISION  
ATTN: ED MARTIN

AD NUMBER: 228521      ACCOUNT: 56689  
LEGAL NO: 70095      P.O.#: 02199000249  
185 LINES      1 time(s) at \$ 81.55  
AFFIDAVITS:      5.25  
TAX:      5.43  
TOTAL:      92.23

AFFIDAVIT OF PUBLICATION

**NOTICE OF PUBLICATION**

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

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

(GW-206) - Key Energy Services, Inc., Mr. Tracy Stockton, 720 Texaco Road, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Key's Construction & Lease Service Yard (formerly Cobra Hobbs facility) located in the NW/4 NW/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 50 feet with a total dissolved solids ranging from less than 1000 mg/l to over 3000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 19th day of September, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
LORI WROTENBERY, Director  
Legal #70095  
Pub. September 26, 2001

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, mm Weideman 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 #70095 a copy of which is hereto attached was published in said newspaper 1 day(s) between 09/26/2001 and 09/26/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of September, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ mm Weideman  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
26 day of September A.D., 2001

Notary

Commission Expires

12/30/03



OFFICIAL SEAL  
Janet L. Montoya  
NOTARY PUBLIC - STATE OF NEW MEXICO

MY COMMISSION EXPIRES 12/30/03

Any interested person

www.sfnwmexican.com

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1 weeks.

Beginning with the issue dated September 23 2001 and ending with the issue dated

September 23 2001

*Kathi Bearden*

Publisher

Sworn and subscribed to before

me this 24th day of

September 2001

*Jodi Benson*

Notary Public.

My Commission expires  
October 18, 2004  
(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL NOTICE  
September 23, 2001  
NOTICE OF PUBLICATION

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

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 19th day of September, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
LORI WROTENBERY, Director  
#18436

01100060000      02550217  
State of New Mexico Oil &  
1220 S. St. Francis  
Santa Fe, NM 87505

# Advertising Receipt

**Hobbs Daily News-Sun**

201 N Thorp  
P O Box 850  
Hobbs, NM 88241-0850  
Phone: (505) 393-2123  
Fax: (505) 397-0610

Ed Martin  
State of New Mexico Oil &  
Conservation Division \*  
1220 S. St. Francis  
Santa Fe, NM 87505

**Cust#:** 01100060-000  
**Ad#:** 02550220  
**Phone:** (505)476-3440  
**Date:** 09/19/01

Ad taken by: Salesperson: 08 Classification: 672

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	09/23/01	09/23/01	1	55.44		55.44
Affidavit for legals						2.00

**Payment Reference:**

LEGAL NOTICE  
September 23, 2001  
NOTICE OF PUBLICATION

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

**Total:** 57.44  
**Tax:** 0.00  
**Net:** 57.44  
**Prepaid:** 0.00  
**Total Due** 57.44

No fee is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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#18434

OK  
to pay  
Ed Martin

Ford, Jack

**From:** Ford, Jack  
**Sent:** Wednesday, September 19, 2001 1:40 PM  
**To:** Martin, Ed  
**Subject:** Public Notices GW-256, GW-254, GW-206, & GW-263



256RE PUB.DOC



263RE PUB.DOC



206RE PUB.DOC



254

## Ford, Jack

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**From:** Martin, Ed  
**Sent:** Wednesday, September 19, 2001 2:16 PM  
**To:** Hobbs News-Sun Attn: Brenda Tison (E-mail)  
**Cc:** Ford, Jack; Olson, William; Anaya, Mary  
**Subject:** Legal Notices

Please publish the attached 2 legal notices, one time only, by Thursday, September 27, 2001.

Upon publication, please forward to this office the following:

1. Publisher's affidavit.
2. Invoice. Our purchase order number is **02199000223**

If you have any questions, please e-mail me or phone (505) 476-3492.

Thank you.



Publ. Notice  
GW-003,004.doc



Publ. Notice  
GW-206.doc

**Ford, Jack**

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**From:** Martin, Ed  
**Sent:** Wednesday, September 19, 2001 2:12 PM  
**To:** Santa Fe New Mexican (E-mail)  
**Cc:** Ford, Jack; Olson, William  
**Subject:** Legal Notices

Please publish the attached 4 legal notices, one time only, by Thursday, September 27, 2001.  
Upon publication, please forward the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is **02199000249**

If you have any questions, please e-mail me or phone (505) 476-3492

Thank you.



Publ. Notice  
GW-003,004.doc



Publ. Notice  
GW-254,256.doc



Publ. Notice  
GW-263.doc



Publ. Notice  
GW-208.doc

**NOTICE OF PUBLICATION**

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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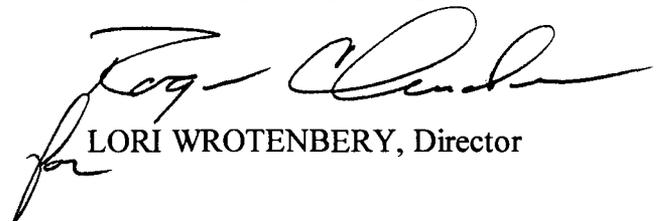
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 19th day of September, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL

4765 NM ENRGY, MNRLS, &amp; NAT RESC DEPT

8/22/2001

CHECK NO. [REDACTED]

INVOICE NO.	INVOICE DATE	GROSS	DISCOUNT	NET AMOUNT
411-APPLICATION FEE	8/08/2001	100.00	.00	100.00
TOTALS		100.00	.00	100.00

Company : KEY ENERGY SERVICES, INC.

8/22/2001

CHECK NO. [REDACTED]

INVOICE NO.	INVOICE DATE	GROSS	DISCOUNT	NET AMOUNT
411-APPLICATION FEE	8/08/2001	100.00	.00	100.00
TOTALS		100.00	.00	100.00

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/22/01  
or cash received on \_\_\_\_\_ in the amount of \$ 100.00

from Key Energy Services

for Key's Construction & Service Yard GW-206

Submitted by: W. J. Fuld Date: 9-11-01

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Account # 2001

To be deposited in the Hazardous Waste Quality Management Fund.

Full Payment  or Annual Increment \_\_\_\_\_



KEY ENERGY SERVICES, INC.  
PO BOX 4400 MIDLAND, TEXAS 79705  
TWO TOWER CENTER, TWENTYFIFTH FLOOR EAST OF HENSWICK, NJ 09816  
916.677.1000 FAX 916.677.4022

PNC BANK NATIONAL ASSOCIATION  
JEANETTE, PA  
60-157-153

No. [redacted]

One Hundred Dollars and No Cent

Check # 12/2001



TO THE ORDER OF

ENVIRONMENTAL SERVICES & NAT. RESC. DIV.  
1225 SOUTH 1ST ST. - FRENCH CREEK  
SANTA FE, NM 87504

P. M. Guld

AUTHORIZED SIGNATURE IF OVER \$10,000.00





*Key Energy Services, Inc.*

**Key Energy Services, Inc.**

**DISCHARGE PLAN**

**KEY'S CONSTRUCTION & LEASE SERVICE YARD**

720 Texaco Road  
Hobbs, New Mexico 88240

Prepared by: Vision Technology, Inc.  
November -2000



*Table of Contents*

Hobbs Discharge Plan

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Type of Facility	2
Name and Address of Owner/Operator	2
Address of Facility	2
Contact Person at Facility	2
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General Information

Hobbs Discharge Plan

Page 1 of 7

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

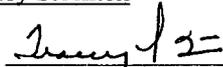
(Refer to the OCD Guidelines for assistance in completing the application)

New  Renewal X Modification

1. Type: Oil and Gas Service Company – Dirt Construction and Roustabout Services
2. Operator: Key Energy Services, Inc.  
Address: 720 Texaco Road Hobbs, New Mexico 88240  
Contact Person: Tracy Stockton Phone: (505) 393-3180
3. Location: NW /4 NW /4 Section 4      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: Tracy Stockton

Title: Construction Manager

Signature: 

Date: 8-3-2001



**General Information**

Hobbs Discharge Plan

Page 2 of 7

**I. Type of Facility**

Oil & Gas Service Company that provides heavy equipment for construction of lease pad, roads and pits, also provides roustabout services to customers. The yard is utilized as a frac tank storage facility.

**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**

720 Texaco Road  
Hobbs, New Mexico 88240

**Contact Person at Facility**

Tracy Stockton, Yard Manager  
Business Phone: (505) 393-3180  
Cell Phone: (505) 910-4125 or (505) 910-4243

**Alternate**

Bob Howerd  
Business Phone: (505) 393-3180  
Cell Phone: (505) 910-4138

DuVane Usener  
Business Phone: (505) 393-3180  
24-Hour Phone: (505) 391-7915

**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.) - None
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** – Frac tanks are empty and do not store fluids. **No waste generated.**
  2. **Truck Washing** – Key Energy only washes the exterior of vehicles and equipment 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. The equipment is **cleaned** with high pressure washer, scrub brushes and soap. (truck soap) (see Exhibit 3) **Cleaning solvents are not used** during vehicle washing procedures.
  4. **Solvents/Degreasers** are **not used** in any of Key’s 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.** Key Energy employs E & E Enterprise to pickup and recycle the oils.
-



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 and equipment are washing at this facility. All fluids drain into a 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.
- 
-



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 in 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 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 sewage 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.
-



**IX. Proposed Modifications**

The used oil containers has an containment wall 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 before 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.

Operators 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 assess 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-

---



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'	Calich 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.

---



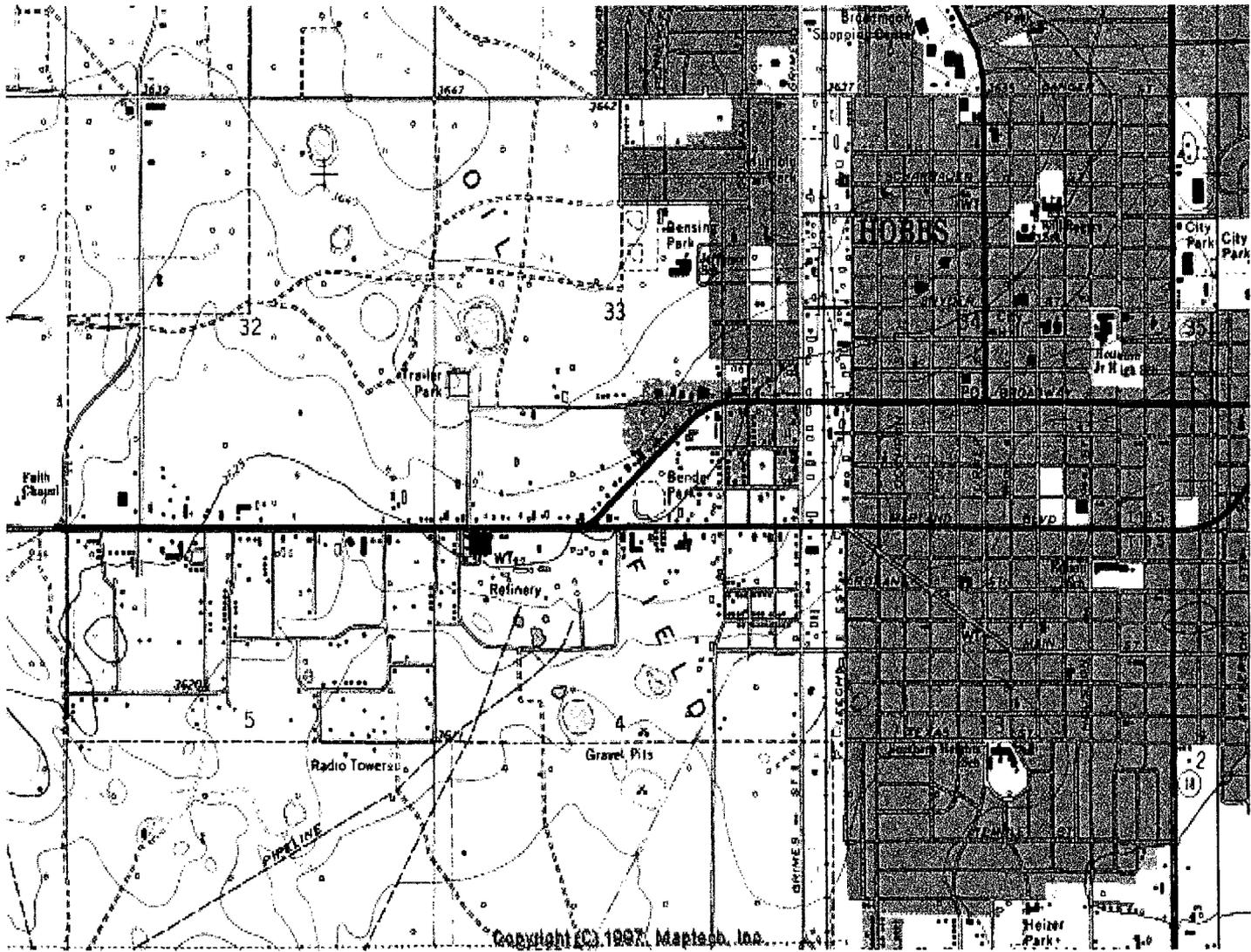
**EXHIBIT INDEX**

Hobbs Discharge Plan

**Exhibit Index**

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

**EXHIBIT 1**  
**FACILITY SITE PLAN MAP**

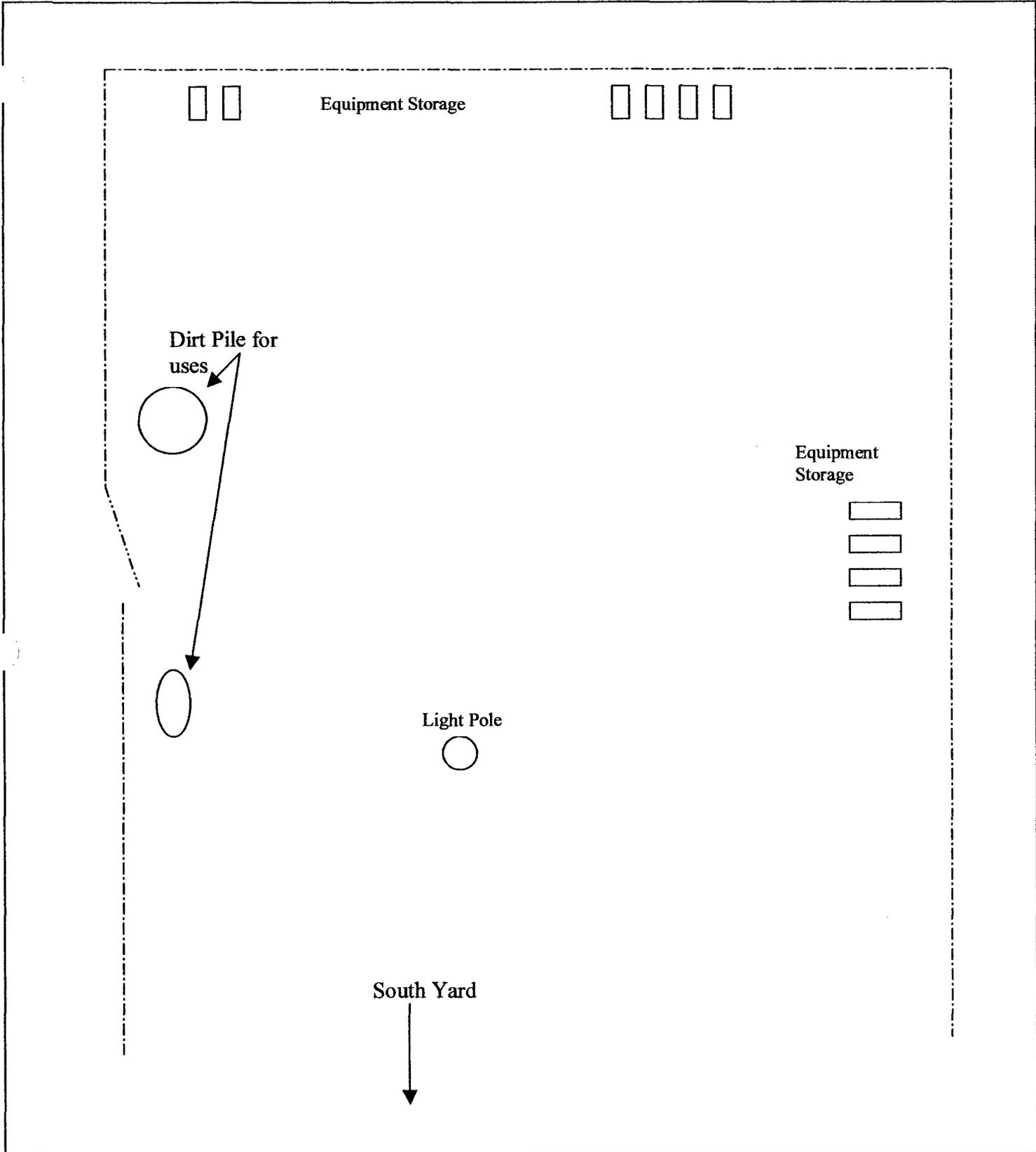


Copyright © 1997, MapInfo, Inc.

Key Energy Services, Inc  
 720 Texaco Road  
 Hobbs, NM

 Key Energy Services Yard

**EXHIBIT 2a**  
**FACILITY DESCRIPTION DIAGRAM**  
**SOUTH HALF OF YARD**



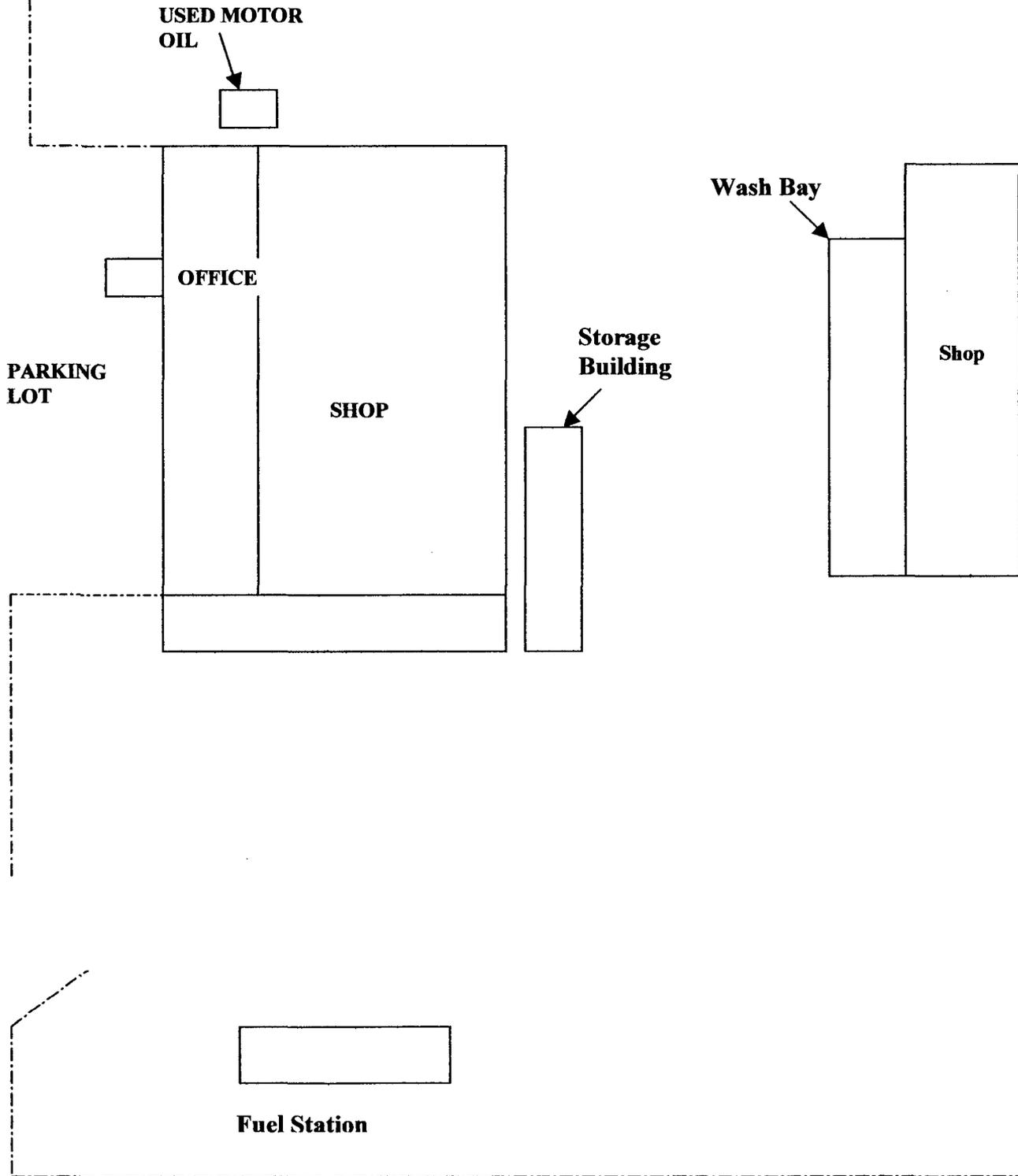
Key Energy Services  
720 Texaco  
Hobbs, NM

North side of yard

Not to Scale

**EXHIBIT 2b**  
**FACILITY DESCRIPTION DIAGRAM**  
**NORTH HALF OF YARD**

NORTH YARD



Key Energy Services  
720 Texaco Road  
Hobbs, NM

South part of the yard

Not to Scale

**EXHIBIT 3a**

**PRODUCT – QUANTITIES - LOCATION**



**EXHIBIT 3b**

**MSDS**

All MSDS information is available at the Key Energy Construction & Lease Services Yard.



**EXHIBIT 4**  
**REPORTING AND CLEAN-UP**

Key Energy Services, Inc.

**BUSINESS EMERGENCY  
CONTINGENCY PLAN**

Key's Construction & Lease Services Yard

720 Texaco Road  
Hobbs, New Mexico

Prepared by: Vision Technology, Inc.  
November 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

Dirt Construction and Roustabout yard, maintenance of equipment

### Location of Facility

720 Texaco Road  
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

Tracy Stockton, District Manager  
Business Phone: (505) 393-3180  
24-Hour Phone (505) 910-4125 or (505) 910-4243

### Alternate

Bob Howerd  
Business Phone: (505)393-3180  
24-Hour Phone: (505)910-4138

DuVane Usener  
Business Phone: (505)393-3180  
24-Hour Phone: (505) 391-7915

### Reportable Oil Spill Event

There have been no known spill events at this yard from the time is was bought by Key.

## 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**

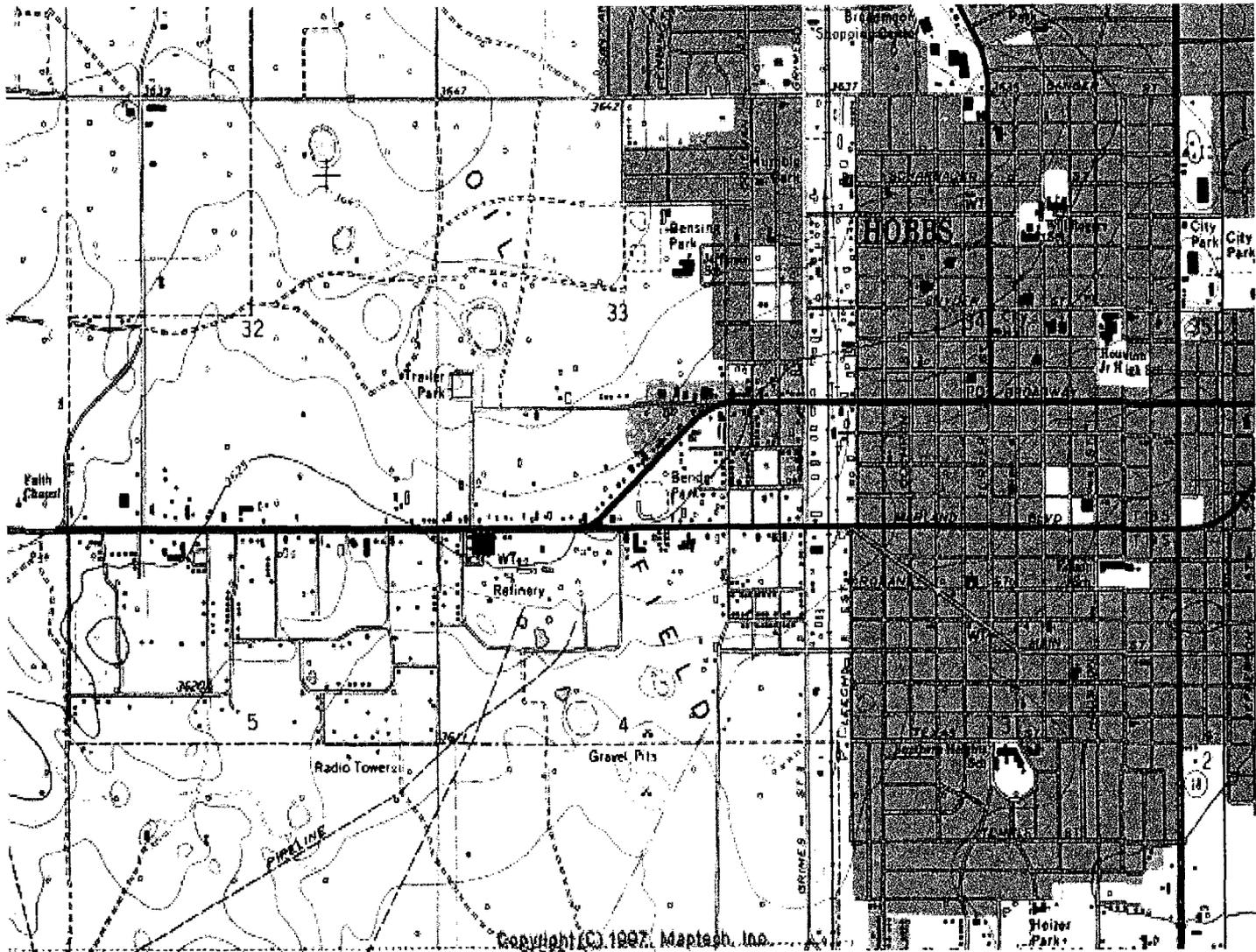
National Response Center	(800) 424- 8802
Poison Information Center	(800) 424 - 8802
EPA Region 6 Emergency Response Center	(214) 665 - 2222
Chemtrec	(800) 424 – 9300

*Local Spill Containment Contractors*

Vision Technology, Inc.  
1943 N. Grimes Suite B  
Hobbs, New Mexico 88240  
505-391-0229

**EXHIBITS**

**EXHIBIT 1**  
**LOCATION MAP**



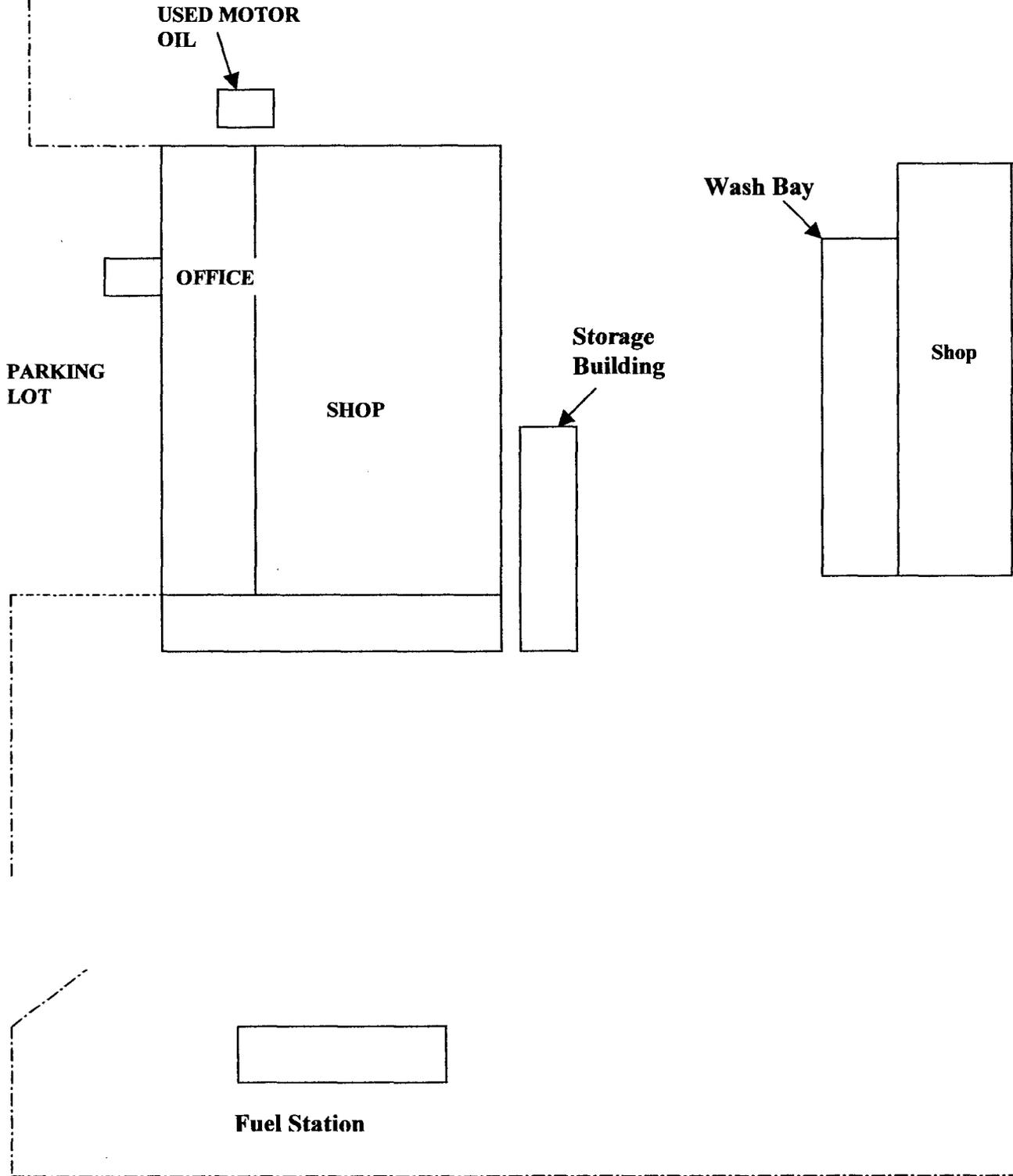
Key Energy Services, Inc  
 720 Texaco Road  
 Hobbs, NM



Key Energy Services Yard

**EXHIBIT 2  
SITE MAP**

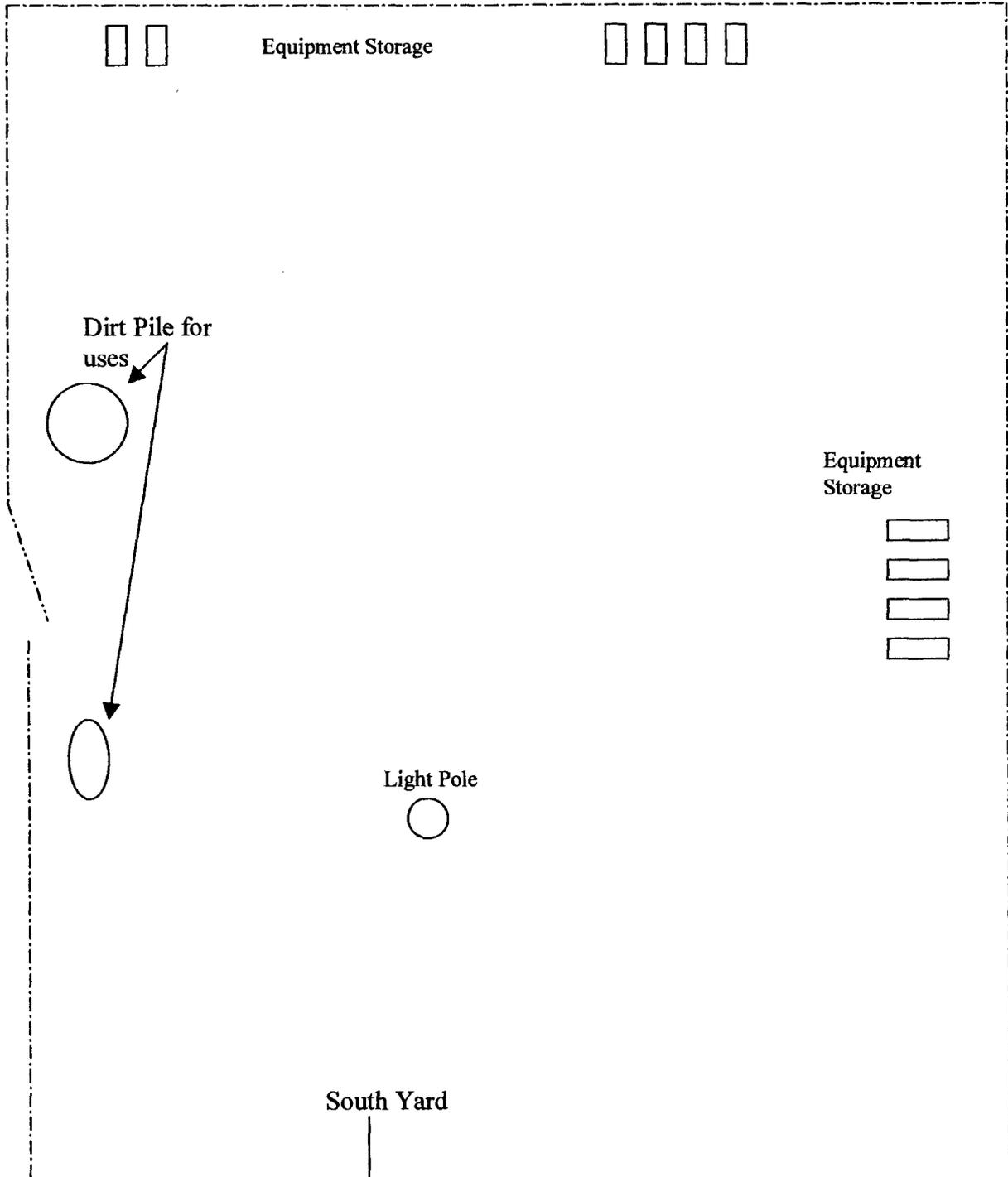
NORTH YARD



Key Energy Services  
720 Texaco Road  
Hobbs, NM

South part of the yard

Not to Scale



Key Energy Services  
720 Texaco  
Hobbs, NM

North side of yard

Not to Scale



April 10, 2001

RECEIVED

Jack Ford  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 877505

APR 17 2001  
Environmental Bureau  
Oil Conservation Division

Dear Mr. Ford

This letter is in response to the conversation we had concerning the old Cobra Industry property in Hobbs. Your request was for an updated Discharge Plan and a letter stating that Key Energy Services, Inc. will comply with the existing plan. I have enclosed a discharge plan that was prepared in August 2000. After talking with the local management it was learned that the plan was not sent to OCD. The yard is no longer used as a manufacturing facility. It is currently used as frac tank storage, dirt work and Roustabout yard. If the Discharge Plan is needed at the facility, Key will submit the plan dated August 2000 for your approval.

If you have any questions please call me.

Thank you

  
Gene Butler  
Key Energy Services, Inc.  
Environmental Manager  
915-620-0300 Office  
915-638-4421

Enclosure

6-1-01  
via telephone  
Sending signed  
Appl. next week

State of New Mexico

**ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT**

220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

**CERTIFIED MAIL**



7099 3220 0000 5051 0210

*ENV*

*3/2*

Mr. Harold Ogle  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, New Mexico 88240-2040

RETURNED TO WRITER  
**REASON CHECKED**  
 Unclaimed \_\_\_\_\_ Refused \_\_\_\_\_  
 Addressee unknown \_\_\_\_\_  
 Insufficient Address \_\_\_\_\_  
 No such street \_\_\_\_\_ number \_\_\_\_\_  
 No such office in state \_\_\_\_\_  
 Do not re-mail in this envelope

*1-800-957-6272*

BB241-2040



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

February 23, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0210**

Mr. Harold Ogle  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, New Mexico 88240-2040

**RE: DISCHARGE PLAN EXPIRATION**  
**Hobbs Facility - GW-206**  
**Lea County, New Mexico**

Dear Mr. Ogle:

On March 9, 2000 Cobra Industries received by Certified Mail a notice for renewal of Discharge Plan GW-206 for the Cobra Industries, Inc.'s Hobbs Facility. Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, §3106, and the authority given the Oil Conservation Division (OCD) requires the holder of an approved Discharge Plan to apply for a renewal within 120 days of the expiration date of the then current discharge plan. Cobra Industries, Inc. is currently in violation of WQCC §3106.F for failure to file a renewal application for the Hobbs Facility covered by discharge plan GW-206.

The discharge plan under which the Cobra Industries, Inc.'s Hobbs Facility is operating expired July 31, 2000. Pursuant to WQCC §3106.F each day of continued operation of the facility without an approved discharge plan constitutes a violation of the regulations. If Cobra Industries, Inc. wishes to continue operations at the facility, submit two copies of a discharge plan renewal application to the OCD Santa Fe office and one copy to the Hobbs District Office for review no later than March 15, 2001.

If Cobra Industries, Inc. does not wish to continue operations a complete closure plan will be submitted for approval no later than April 1, 2001. Continued operation of the Hobbs Facility without a current discharge plan could result in substantial penalties to Cobra Industries, Inc..

---

Mr. Harold Ogle  
GW-206 – Hobbs Facility  
February 23, 2001  
Page 2

If there are any questions on this matter, feel free to contact Mr. W. Jack Ford, Environmental Bureau, OCD at (505) 476-3489 as he is assigned responsibility for review of this facility's discharge plan.

Sincerely:



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

cc: Hobbs OCD District Office



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

February 23, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0210**

*Called 02/26/01*  
*Phone disconnected*

Mr. Harold Ogle  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, New Mexico 88240-2040

**RE: DISCHARGE PLAN EXPIRATION**  
**Hobbs Facility - GW-206**  
**Lea County, New Mexico**

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Mr. Harold Ogle  
GW-206 – Hobbs Facility  
February 23, 2001  
Page 2

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Sincerely:



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

cc: Hobbs OCD District Office

7099 3220 0000 5051 0210

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only. No Insurance Coverage Provided)	
Article Sent To:	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

SANTA FE, N.M. 87502  
FEB 27 2001  
Postmark Here  
USPS

Name (Please Print Clearly) (To be completed by mailer) <i>H. Ogle</i>	
Street, Apt. No.; or PO Box No. <i>Cobra Ind.</i>	
City, State, ZIP+ 4 <i>GW-206</i>	

PS Form 3800, July 1999 See Reverse for Instructions



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

February 25, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5050 9252**

Mr. Harold Ogle  
Compliance Manager  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, New Mexico 88240-2040

**RE: Discharge Plan GW-206 Renewal  
Hobbs Facility  
Lea County, New Mexico**

Dear Mr. Ogle:

On July 21, 1995, the groundwater discharge plan renewal, GW-206, for the Cobra Industries, Inc. Hobbs Facility located in the NW/4 NW/4 of Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on July 21, 2000.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Cobra Industries, Inc. has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **Hobbs Facility** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for oil field service company facilities. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Harold Ogle  
February 25, 2000  
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at [www.emnrd.state.nm.us/oed/](http://www.emnrd.state.nm.us/oed/)).

If the Hobbs Facility no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Cobra Industries, Inc. has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Hobbs District Office

U.S. Postal Service		CERTIFIED MAIL RECEIPT		OCD Form	
<small>(Domestic Mail Only - No Insurance Coverage Provided)</small>					
Article Sent To:					
Postage \$					
Certified Fee					
Return Receipt Fee (Endorsement Required)					
Restricted Delivery Fee (Endorsement Required)					
Total Postage & Fees \$					
Name (Please Print Clearly) (To be completed by mailer) H. Ogle					
Street, Apt. No.; or PO Box No. Cobra					
City, State, ZIP+ 4 Hobbs					
PS Form 3800, July 1999 See Reverse for Instructions					

7099 3220 0000 5050 9252

Postmark Here

GW-200

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 12/26/96

or cash received on \_\_\_\_\_ in the amount of \$ 828.00

from Cobra Ind

for Hobbs GW-206

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (OP No.)

Submitted to ASD by: R. Anderson Date: 1-24-97

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee \_\_\_\_\_ New Facility  Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment  or Annual Increment   
3,475 of 5

**COBRA INDUSTRIES, INC.**  
P. O. BOX 2040 393-1491  
HOBBS, NM 88241-2040

December 26 1996 95-183/1122  
5

PAY TO THE ORDER OF NMED Water Quality Management \$ 828.00\*\*\*\*\*

2-96 TO 2-98 **828 DOLS 00 CTS** DOLLARS   
REG 1155A8

 **Lea County State Bank**  
P.O. Box 400 • Hobbs, New Mexico 88241

FOR Final Payment GW 206 [Signature] 

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7/10/96,  
or cash received on \_\_\_\_\_ in the amount of \$ 276.00

from Cobra Industries

for Hobbs Svc GW-206

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Submitted to ASD by: R. Anderson Date: 7/31/96

Received in ASD by: D. Salazar Date: 7/31-96

Filing Fee  New Facility  Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment   
2 of 5



COBRA INDUSTRIES, INC.

P.O. BOX 2040  
HOBBS, NEW MEXICO 88241-2040  
TELEPHONE 505/393-1491

LEA COUNTY STATE BANK  
HOBBS, NEW MEXICO 95-183 / 1122

CHECK DATE	CHECK NO.
7/10/96	[REDACTED]

VOID AFTER 90 DAYS

CHECK AMOUNT
*****276.00*****

TWO HUNDRED SEVENTY SIX DOLLARS & ZERO CENTS

BY TO ORDER: NMED Water Quality Mgt.  
OCD  
2040 South Pacheco  
Santa Fe, NM 87504-

COBRA INDUSTRIES, INC.  
[Signature]



025220

COBRA INDUSTRIES, INC. ■ P.O. BOX 2040 ■ HOBBS, NEW MEXICO 88241-2040

INVOICE NO.	INVOICE DATE	REFERENCE	INVOICE AMOUNT	DISCOUNT	PAYMENT AMOUNT
JUNF96	6/01/96		276.00		276.00
	GW 206				
CHECK NO.	VENDOR NUMBER	SEQUENCE NUMBER	<b>TOTALS</b> ▷		
██████	N0950		276.00		276.00

**Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Tuesday, February 13, 1996 7:26 AM  
**To:** Pat Sanchez  
**Cc:** Jerry Sexton  
**Subject:** Cobra Well Ser. Co.-Thermal treatment of soils

Dear Pat,

Don Trusty called and gave me the name of the person at the NMED-Air Quality:

Mr. Jim Schidley-827-1468

## **Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Thursday, February 08, 1996 4:39 PM  
**To:** Pat Sanchez  
**Cc:** Jerry Sexton; Wayne Price  
**Subject:** Cobra Well Ser.-Hobbs Gw-206

Dear Pat,

Harold Ogle informed me today they have three new horizontal oil tanks for (new motor oil, new hydraulic oil, and new chain oil) located inside of their main shop on concrete. The size of these tanks are quite small 265 gal.

We discussed the issue of these tanks being bermed. I informed Harold that the concrete was the secondary containment and the footer and natural design of the floor would probably act as a berm that would contain any spills. These tanks have drip containment devices under them.

It appears to me this design meets the discharge plan requirements.

If you have any questions please let us know.

Thanks!

## **Pat Sanchez**

---

**From:** Wayne Price  
**Sent:** Thursday, February 08, 1996 2:47 PM  
**To:** Pat Sanchez  
**Cc:** Wayne Price; Jerry Sexton  
**Subject:** Cobra Well Ser.

Dear Pat,

Don Trusty has notified us that he has received verble (one time) permission from NMED Air Quality Div. to thermal treat the contaminated soils on site.

He could not remember the persons last name, first name is Jim. He will call me and let me know before they treat soils.



sump when completed.



cc: JERRY SEFTON



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

JAN 10 1996

RECEIVED

JAN 10 1996

USE THIS OFFICE

RECEIVED  
JAN 12 1996

Mr. Harold Ogle  
Safety Director  
Cobra Industries, Inc.  
720 Texaco Road  
P.O. Box 2040  
Hobbs, NM 88241-2040

Dear Mr. Ogle:

The U.S. Environmental Protection Agency (EPA) conducted an inspection on April 26, 1995, at a facility owned by Cobra Industries, Inc., in Hobbs, New Mexico. The compliance evaluation inspection reviewed the operation practices at the facility to determine if Cobra Industries, Inc., was in compliance with the Resource Conservation Recovery Act (RCRA). After reviewing information gathered as a result of the inspection, the EPA detected potential discrepancies with RCRA requirements.

Please be advised that the EPA has reviewed the facts gathered during the RCRA inspection, the subsequent EPA request for information, and the fact finding meeting with Cobra Industries, Inc., which was held at the EPA offices in Dallas, Texas. The EPA has determined that the evidence regarding the potential discrepancies identified during the April 1995 inspection is inconclusive in regard to compliance with RCRA violations. Therefore, the EPA is foregoing further enforcement action in regard to the potential discrepancies identified in the April 1995 inspection at the Cobra Industries, Inc., facility.

Thank you for your cooperation in this matter. If you have any questions relating to the hazardous waste regulations under RCRA, please notify me at your convenience at the above address or at (214) 665-2287.

Sincerely yours,  
*Gregory E. Pashia*

Gregory E. Pashia, Enforcement  
Officer  
ALONM Section  
Hazardous Waste Enforcement Branch

cc: Mr. Coby Muckelroy  
New Mexico Environment Department

OIL CONSERVATION DIVISION  
RECEIVED

RECEIVED

NOV 17 1995

Environmental Bureau  
Oil Conservation Division

STATE OF  
NEW MEXICO  
OIL  
CONSERVATION  
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

'95 NOV 17 AM 8 52

Telephone

Personal

Time  
8:00 AM

Date  
11/15/95

Originating Party

Other Parties

HAROLD OGLE - COBRA INC.  
HOBBS

Subject  
SUMP INVESTIGATION

Discussion  
PROGRESS REPORT -

INSURANCE CO. & CONTRACTOR ON SITE

HAROLD TOOK SAMPLE FOR TELP (IGN) PER  
PAT SANCHEZ

Conclusions or Agreements

WILL REPORT TO SANTA FE & CC HOBBS

Distribution CC: JERRY SEYTON  
PAT SANCHEZ

Signed *[Signature]*

CC: JERRY SEATON  
PAT SANCHEZ

NEW MEXICO OIL CONSERVATION COMMISSION  
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER	HOURS
------------	----------------	----------	-------	---------	-------

Name WAYNE PRICE Date 10/27/95 <sup>10/31/95 11/1/95</sup> Miles \_\_\_\_\_ District I  
 Time of Departure 7 AM Time of Return 4 PM Car No. G 0472

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]

COBRA IND - 720 TEXACO ROAD GW-206  
 LEAKING SUMP INVESTIGATION (WASH + STEAM BAY)  
 VISUAL CONTAMINATION AROUND SUMP SAND LAYER;

10/27/95 - FIELD REPORT ATTACHED, WITNESSED SAMPLE  
 ≈ 4:00 PM  
 SAND LAYER TAKEN TOOK PICTURES; ≈ 3' BELOW SUMP  
 PFD ≈ 91 PPM (BLEX); ≈ 8'9" BELOW <sup>TOP OF CONCRETE</sup> ~~SUMP~~  
 WHITE POWDERY CALCITE PFD ≈ 9 PPM (BLEX)

10/31/95 - WITNESSED COBRA PERSONNEL (HAROLD OGLE) TAKING  
 10:30 AM  
 SAMPLE BELOW SUMP. COBRA INSTALLED 2" PIPE CASING  
 TOOK SAMPLE USING 1 5/8" - 13' 6 1/2" LONG DIRT TIER  
 ≈ 12' BELOW TOP OF CONCRETE - WHITE POWDERY CALCITE

11/1/95 - WITNESSED SAMPLE TAKEN ≈ 15' BELOW TOP OF CONCRETE  
 2:30 PM  
 SEMI-HARD CALCAREOUS SAND (CALCITE) - NO VISUAL  
 OR OLFACTORY CONTAMINATION - TOOK PICTURES

<u>Mileage</u>	<u>Per Diem</u>	<u>Hours</u>
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED	INSPECTION CLASSIFICATION	NATURE OF SPECIFIC WELL OR FACILITY INSPECTED
H = Housekeeping	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.)	D = Drilling
P = Plugging	R = Inspections relating to Reclamation Fund Activity	P = Production
C = Plugging Cleanup	O = Other - Inspections not related to injection or The Reclamation Fund	I = Injection
T = Well Test	E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)	C = Combined prod. inj. operations
R = Repair/Workover		S = SWD
F = Waterflow		U = Underground Storage
M = Mishap or Spill		G = General Operation
W = Water Contamination		F = Facility or location
O = Other		M = Meeting
		O = Other



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time	Date 11/6/95
---	-----------------------------------	------	--------------

<u>Originating Party</u>	<u>Other Parties</u>
COBRA - HAROLD OGLE	

SUBJECT LEAKING SUMP - SAMPLE RESULTS

Discussion

10/27/95 - 8'9" DEEP PRELIMINARY TPH RESULTS = 25.3 PPM

11/2/95 - 3:30 pm - : RESULTS 12' DEEP TPH ≈ 198 PPM GA/GC  
126 PPM NO GA/GC

11/6/95 2:51 pm - RESULTS 15' DEEP TPH ≈ < 5 PPM

Conclusions or Agreements

COBRA IS CHECKING WITH CONTRACTOR WHO INSTALLED SUMP;  
WAYNE PRICE NMOED WILL SEND REPORT TO PAT SANCHEZ!

<u>Distribution</u> CC: JERRY SEXTON PAT SANCHEZ	Signed
---	--------

## Pat Sanchez

---

**From:** Pat Sanchez  
**Sent:** Tuesday, November 07, 1995 2:16 PM  
**To:** Wayne Price  
**Subject:** COBRA INDUSTRIES - SUMP INVESTIGATION  
**Importance:** High

Wayne, I talked with Mr. Ogle at about 10:15 AM today regarding the above subject, we discussed the following:

1. Mr. Ogle will obtain the pit closure guidelines from you and based on the hydrological data in the discharge plan determine what Rank score their contamination would fall under. He will also obtain a soil sample for flash point.

I told Mr. Ogle that if based on their rank score and if the flash point is greater than 140 F and if the levels are below the guidelines he could look at leaving the soil in place. I asked him to put together a report and propose what they are going to do - he said his boss wants to remove the soil. I also asked him to submit his report with the TCLP that was ran on the sump to justify knowledge of process that the sump does not have the toxicity characteristic.

We also discussed the sump in general and I told him if he were to want to continue with this process he would have to replace the existing sump with a sump with secondary containment and leak detection.

2. In general Wayne they still need to decide if they are going to :
- A. Close the sump by plugging the pipes and filling with sand.
  - B. Remove the sump entirely and replace with a sump with secondary containment.

As we discussed on the phone earlier today our choices will vary depending upon which course of action they choose-further I told Mr. Ogle it would probably be in their best interest to determine their rank score from the guidelines and obtain a flash point on the soil. Because if they are below the guideline levels and the flash point is greater than 140 F even if they choose to remove the sump and replace it with a new one with Secondary containment and leak detection they have the do nothing to the soil option.

So hopefully Mr. Ogle will rank the contamination and figure out what they are going to do with sump and provide a report/plan for us to review and approve.

I also said they could do the temporary thing with plastic under the trailers and recycle their water in a tank. Harold said if they were to operate they would steam offsite and test onsite.



**Pat Sanchez**

**From:** Wayne Price  
**Sent:** Monday, November 06, 1995 4:23 PM  
**To:** Pat Sanchez  
**Cc:** Roger Anderson; Jerry Sexton  
**Subject:** Cobra-Gw-206 leaking sump  
**Importance:** High

Dear Pat,

Harold Ogle has been in constant communication with me concerning the leak they found in the sump. Presently they have the sump out of service. They are dealing with the contractor who installed it for liability reasons. They have not made a decision as to whether they want to keep using it. They understand they will need leak detection if they put it back in service. I have suggested to them they probably would be allowed to repair the existing sump and put it back into service temporary so it doesn't completely shut down their operations and cause an undue hard ship on their operations.

The following is preliminary results of the soil sample taken as of to date:

10/27/95 Visual contaminated soil is mostly contained in and around the sand pack of the sump.

2" below sand layer is compacted caliche PID (BTEX)- 91 ppm  
8'9" deep PID=9ppm, TPH 418.1=253 ppm

10/31/95 12' deep PID=0 no visual or Olfactory TPH=198 ppm with QA/QC  
=128 ppm no QA/QC

11/1/95 15' deep No visual or Olfactory (Clean) TPH=<5 ppm (New Lab).

Harold would like to talk to you concerning their options. Would you please give him a call.

Field observations indicated the contamination is very shallow and is only contained in the sand pack around the sump. It is my opinion there is very little environmental damage that can be determined at this time. Ground water does not appear to have been impacted. The contamination is under concrete and the sump is out of service therefore reduces any possible migration.

I will forward you my field reports and pictures.

Please note Cobra has been very pro-active concerning this environmental issue and has demonstrated an excellent response to this matter.

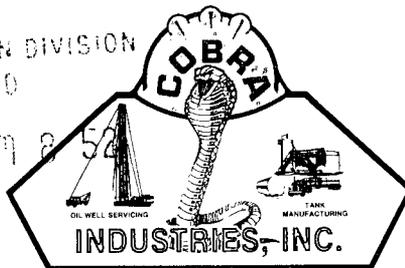
Please give them a call.

Thanks!

(505) 393-1491  
1-800-952-6272

Oil Conservation Division  
RECEIVED

105 00 AM 8 54



LOVINGTON, NM (505) 396-7167  
JAL, NM (505) 395-2150  
MIDLAND, TX (915) 520-8734  
WICKETT, TX (915) 943-3913  
(Monahans)

**OIL WELL SERVICING  
TANK MANUFACTURING**

P.O. Box 2040 • Hobbs, New Mexico 88241-2040

October 25, 1995

Mr. Roger C. Anderson  
Environmental Bureau Chief  
Energy, Minerals & Natural Resources Dept.  
NM Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

CERTIFIED MAIL

Dear Mr. Anderson:

In accordance with our Discharge Plan GW-206, I performed an inspection of the wash bay sump at our facility.

After the sump had been emptied and the walls were cleaned with our steam cleaner, I physically entered the sump. I took a probe of approximately 3/16" diameter to check the corners and joints for leaks. While probing the southwest corner at the seam where the top and bottom sections of the tank are joined, the probe went beyond the depth of the wall.

Further investigation this morning revealed that a section of the tongue in the tongue-and-groove design of the seam was broken.

Apparently, fresh water and a small amount of crude oil have leaked through the seam into the surrounding soil.

Today, we are boring through the floor of the sump to collect samples of the soil underneath the sump so that we may determine the depth of any affected soil. We are also boring through the west wall to determine the extent of any affected soil laterally. Samples for chemical analysis for BTEX will be delivered to Cardinal Laboratories late this afternoon.

We are sealing all openings to the sump so that no fluids will be allowed to enter. There are three openings. The first is an eight inch diameter opening from the trench into the sump. We will seal it with concrete. The second and third openings are manways with steel covers. They are approximately twenty-four inch square. The manway and cover surfaces will be abraded and sealed with silicon.

The outlet pipe is four inch, inside diameter, PVC. It will be sealed with a PVC cap.

These sealing methods are temporary, and will be used only until the extent of the leak is determined and properly eliminated.

The notification form is completed and enclosed.

Sincerely,



Harold Ogle  
Compliance Manager

enclosures as stated

HO/gmc

cc: Jerry Sexton - NMOCD Hobbs  
Wayne Price - NMOCD Hobbs

DISTRICT I  
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III  
1000 Rio Brazos Rd, Aztec, NM 87410

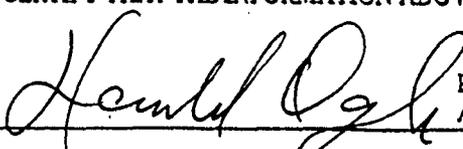
State of New Mexico  
Energy, Minerals and Natural Resources Department

### OIL CONSERVATION DIVISION

P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO  
APPROPRIATE DISTRICT  
OFFICE IN ACCORDANCE  
WITH RULE 116 PRINTED  
ON BACK SIDE OF FORM

#### NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

OPERATOR Cobra Industries, Inc.				ADDRESS 720 Texaco Road, Hobbs			TELEPHONE # 393-1491	
REPORT OF	FIRE	BREAK	SPILL	LEAK X	BLOWOUT	OTHER*		
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* Tank Manufacturing	
FACILITY NAME: Cobra Industries Tank Manufacturing, Inc.								
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage NW 1/4 NW 1/4				SEC. 4	TWP. 19S	RGE. 38E	COUNTY Lea	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK								
DATE AND HOUR OF OCCURRENCE				DATE AND HOUR OF DISCOVERY 10/23/95 16:30				
WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQUIRED X	IF YES, TO WHOM				
BY WHOM				DATE AND HOUR				
TYPE OF FLUID LOST Fresh Water				QUANTITY OF LOSS Unknown		VOLUME RECOVERED		
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY					
IF YES, DESCRIBE FULLY**								
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**  Improperly fitted, contractor installed, oil and water separator.								
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**  The affected area is under investigation.								
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN X	OTHER* Tank Mfg. Facility				
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY X	WET	DRY X	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**  The sump is set in caliche. Temperature is mid 40's for lows, and mid 70's for highs.								
I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF								
SIGNED				PRINTED NAME AND TITLE	Harold Ogle - Compliance Mgr			DATE 10/25/95

MEMORANDUM OF MEETING OR CONVERSATION

✓ TELEPHONE PERSONAL TIME 9:45 AM/PM DATE 10/27/95

ORIGINATING PARTY: Pat Sanchez - NMOLD

OTHER PARTIES: Harold Dagle - Cobra Well Service.

SUBJECT: Wash Sump - leak found.

DISCUSSION: TPH ≤ 100 ppm  
BTEX ≤ 50 ppm  
Benzene ≤ 10 ppm

- Determine Vertical Extent.
- STORE in Drums Temp. and Characterize Soil to determine proper disposal options.
- Previous TCLPS did not show hits - only tested haz. by Flash point.

CONCLUSIONS/AGREEMENTS: Harold will do the above and contact Wayne.

Also they will discuss Bigram cell for rig leaks. - I told Harold this was supposed to be a one time shot - to clean up North Area soil where rigs had leaked.

PATRICIO W. SANCHEZ: *Patricio W. Sanchez*

XC: FILE, WAYNE PRICE.

(214-665-2287)

MEMORANDUM OF MEETING OR CONVERSATION

✓ TELEPHONE PERSONAL TIME 3:00 AM/PM DATE 9/21/95

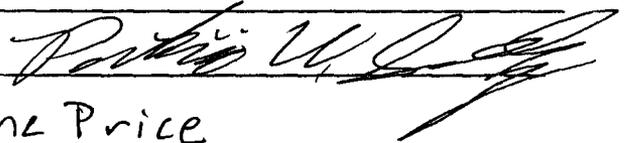
ORIGINATING PARTY: Greg Pashia - EPA Region VI - RCRA  
OTHER PARTIES: Pat Sanchez - NMCCD

SUBJECT: Discuss Cabrera Well Service

DISCUSSION: Greg wanted to know if NMCCD had inspected Cabrera before the formal inspection that was done out of SANTA FE OGD - I told him I did not know - But possibly Wayne Price w/ the District had been by - I told him I had heard of allegations of CBRA upsetting the city of Hobbs PERM - but had never seen anything in writing - Therefore I did not know how true the allegations were. (HEARD this from Bill Olson)

\* CONCLUSIONS/AGREEMENTS: I told Greg I would check w/ my supervisor and see if it is okay to contact Wayne - AND see if any other inspections from the District had been done in 1994.

PATRICIO W. SANCHEZ:



xcc: FILE, Roger Anderson, Wayne Price

\* RCA, 3:30 pm 9/21/95 said it was okay to contact Wayne Price and see if any other inspections prior to the Santa Fe inspection had been done.

\* 4:03 pm - No OGD inspection by Mr. Wayne Price NMCCD District I before Feb. 7, 1995  
per verbal w/ Wayne (9/21/95)

August 24, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-963-115**

Mr. Mike McDermott  
 President  
 Cobra Industries, Inc.  
 P.O. Box 2040  
 Hobbs, NM 88240-2040

**RE: Letter to Patricio W. Sanchez Dated August 14, 1995**  
**Discharge Plan GW-206**  
**Cobra Industries, Inc., Hobbs facility**  
**Lea County, New Mexico**

Dear Mr. McDermott:

I can appreciate some of the frustration you have undergone during the last several months. I am sorry that your business at the Hobbs facility did not have the chance to be under an approved and implemented NMOCD discharge plan permit before the EPA inspection. The NMOCD has always worked **WITH** industry to solve problems in the oil patch and I regret that our efforts to aid you and your company in complying with existing law was interpreted as a regulatory attack on your operation.

Outlined below are some points of clarification regarding the above captioned letter:

1. EPA Region 6 out of Dallas, Texas never conferred with the NMOCD Santa Fe Office before conducting their RCRA inspections. NMOCD does not regulate hazardous waste. However when we do a discharge plan inspection, we do offer advice in this area, because NMOCD permitted Waste Management facilities cannot accept hazardous waste. One of our goals is to help companies such as yours from generating hazardous waste so they can use State approved waste management facilities.
2. Under the "Water Quality Act" the NMOCD is a constituent agency and must enforce the "Water Quality Control Commissions" regulations in order to protect the groundwater of the State of New Mexico.
3. Enclosed you will find copies of my field inspection notes and the review letter sent to Mr. Harold Ogle on June 23, 1995 as well as the inspection notes from Mr. Wayne Price and Mr. Chris Eustice - both NMOCD inspectors and technical staff. I cannot find a recommendation regarding scrap metal; NMOCD does not regulate scrap

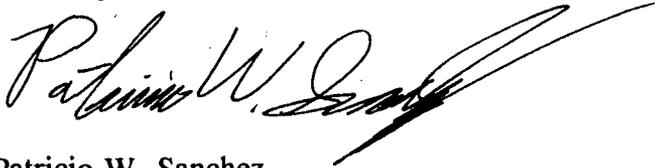
Mr. Mike McDermott  
August 24, 1995  
Page 2

metal. NOTE: Drums - empty or full and their proper storage and disposal are considered because of the potential threat to the environment.

4. NMOCD cannot tell the Hobbs Fire Marshal how to implement and enforce NFPA standards in any way shape or form - even for secondary containment.

If you have any questions please call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez  
Environmental Bureau , Petroleum Engineer

Z 765 963 115



**Receipt for  
Certified Mail**

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

Sent to <i>Mr. Mike McDermott.</i>	
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

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/15/95

or cash received on 8/18/95 in the amount of \$ 276.00

from Cobra Industries

for Hobbs Facility GW-206

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (DP No.)

Submitted to ASD by: Roger Anderson Date: 8/29/95

Received in ASD by: Angie Aise Date: 9/1/95

Filing Fee \_\_\_\_\_ New Facility  Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment   
1 of 5

**COBRA INDUSTRIES, INC.**

P. O. BOX 2040 393-1491  
HOBBS, NM 88241-2040



95-183/1122  
5

August 15 19 95

PAY TO THE ORDER OF N.M.E.D. WATER QUALITY MANAGEMENT \$ 276.00

CERT. 5-94-5-96  
8N545399 276 DOLS 00 CTS

DOLLARS



**Lea County State Bank**

P.O. Box 400 • Hobbs, New Mexico 88241

FOR First payment of 5

*Mike McClinton*



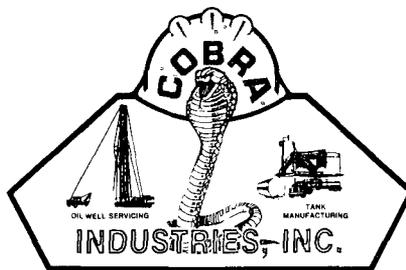
GUARDIAN'S SAFETY  
DECLARKE AMERICAN BA

(505) 393-1491

1-800-952-6272 CONSERVATION DIVISION

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195 AUG 14 AM 8 52



**OIL WELL SERVICING  
TANK MANUFACTURING**

P.O. Box 2040 • Hobbs, New Mexico 88241-2040

LOVINGTON, NM (505) 396-7167

JAL, NM (505) 395-2150

MIDLAND, TX (915) 520-8734

WICKETT, TX (915) 943-3913  
(Monahans)

August 14, 1995

Mr. Patricio W. Sanchez  
State of New Mexico  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Dear Mr. Sanchez:

Pursuant to your second request, I am enclosing a check in the amount of \$276.00 representing the first of five payments for the five year discharge plan for our 4 acre equipment yard and shop facility. I agree, by law, subject to the WQCC Regulation 3-114, that my company owes this fee along with the \$50.00 filing fee we have already paid.

However, I believe this to be an expensive and additional burden on our state's independent, tax generating businesses. As a result of your inspection, we estimate we have spent at least \$10,000.00 in lab fees, bioremediation costs and all the man hours our safety director has dedicated to dealing with the inspection and the issues. Specifically the issue of our sump liquid originally being declared hazardous waste. This does not account for the over 100 tons of scrap steel and parts we sold at a fraction of its worth to us, in order to comply with a better housekeeping request for the southeast corner of our yard. In addition, we anticipate spending several thousand dollars building the new diesel storage tank facility. I do agree we need the new storage facility but, for your information, the City of Hobbs Fire Marshall will not let us use a plastic lined berm for the tank. He is requesting a full concrete pad and wall for the tank. The bid estimate is \$11,520.00 for the pad and wall.

To date we have not heard from the EPA concerning their inspection. To refresh your memory, they came in about 60 days after your inspection and were told we had just completed an inspection by the state of New Mexico. They advised that they were a completely separate agency and did not work in conjunction with your agency and continued with their inspection by a 5 person team.

In today's unstable well servicing, oil and gas industry economy, it is very difficult to make a profit. The additional state and federal regulations have caused an exodus of the domestic energy pursuits to overseas markets. Presently we are only working 24 rigs, compared with 35 rigs we were working at this time a year ago. This equates to about 50 less employees. We must all work together to reach a more flexible and responsive policy and regulatory framework.

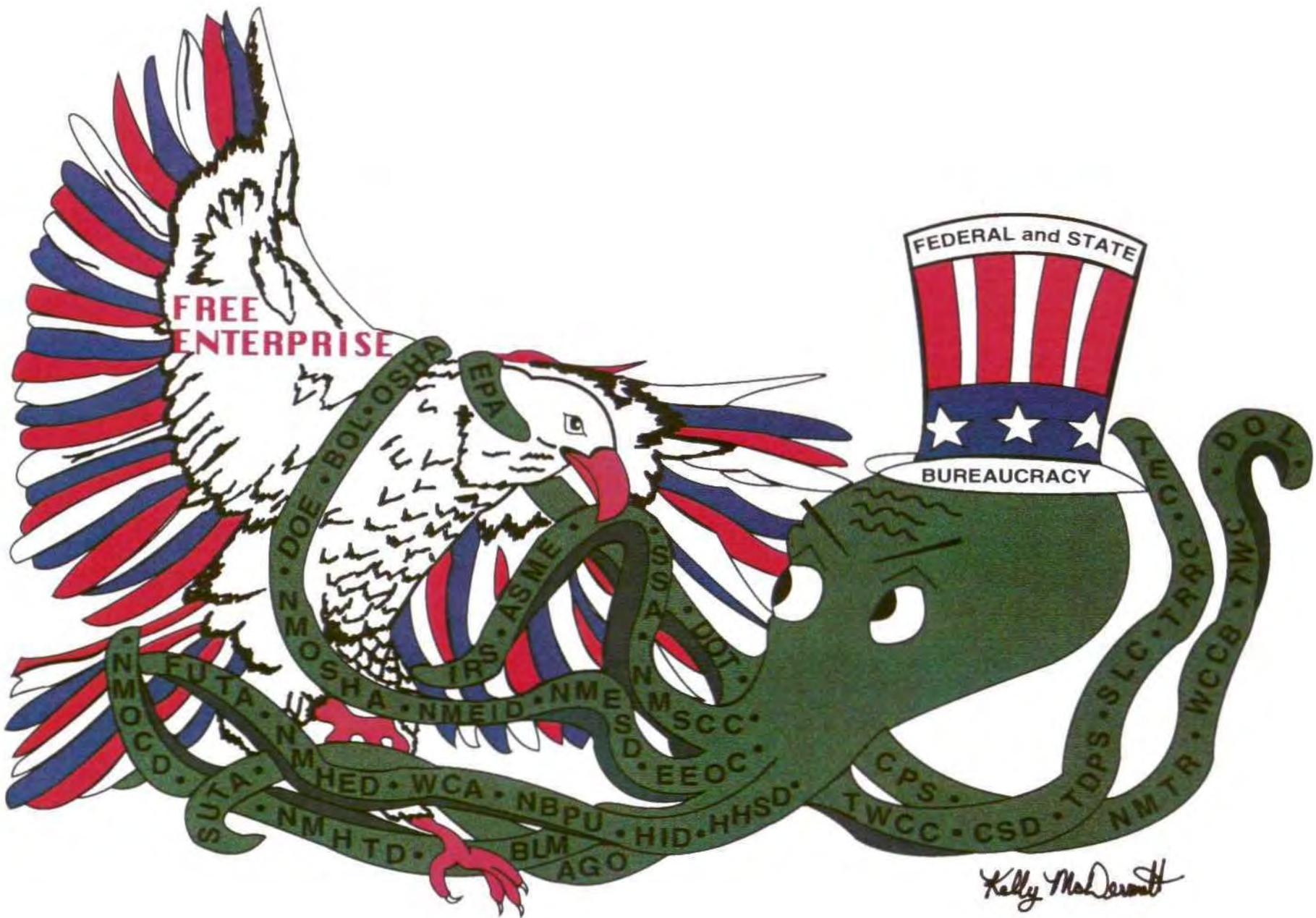
I want to assure you that my company, Cobra Industries, Inc., and myself are committed to being practical stewards of the land and environment.

Sincerely,

Mike McDermott  
President

xc: Governor Gary Johnson  
Lt. Governor Walter Bradley  
Randy Owensby - City of Hobbs, Mayor  
Bo Thomas - City of Hobbs, Manager

William J. LeMay - Director, NMOCD  
Jerry Sexton - OCD, Hobbs, NM  
Wayne Price - OCD, Hobbs, NM



**FREE THE EAGLE**

## Pat Sanchez

---

**From:** Pat Sanchez  
**To:** Wayne Price  
**Subject:** RE: Cobra Ind. DP # GW-206  
**Date:** Friday, August 04, 1995 12:36PM  
**Priority:** High

Dear Wayne, the answer to your question 1. is No, Yes, No.

2. Once the epa issue is resolved then harold will be asked to submit a time frame.
3. see the original application VIII. A. 1. & 9. note this will change pending EPA and NMED advice to cobra regarding the oil/water/sludge separator.

I have not yet contacted harold or coby at Ed - If I do not here from them in the next couple of weeks I will follow up and you you will be informed.

-----  
**From:** Wayne Price  
**To:** Pat Sanchez  
**Cc:** Wayne Price  
**Subject:** Cobra Ind. DP # GW-206  
**Date:** Friday, August 04, 1995 9:50AM  
**Priority:** High

Dear Pat,

Thanks for sending Cobra's final addendum to their discharge plan and your approval letter along with the corospondence of July 6 & 7 1995.

I have a couple of questions that might have already been addressed, however I do not have these as part of our files in Hobbs.

1. On the attachment to the discharge plan item 6A. (Waste Disposal) we indicate that "All waste shall be disposed of at an NMOCD approved facility."
- Q. Does this mean the waste has to go to one of our permitted facilities or does it just mean that it must be approved by NMOCD before being disposed of.

The other question that I have is, if the waste stream is identified and the disposal method is mentioned in the discharge plan then I assume that we do not have to approve these everytime they shipp this waste off site?

2. Proposed Modifications.

Q. Is there a time frame for these to be complete?

3. The Oil/Water Separator apparently has three waste streams, oil, water, and sludge. The plan identified where the water (going to POTW) and the sludge (going off-site to Lea Co. Septic Co. NMED permit # DP # 884), but the final disposition of the oil was not included. There was correspondence that indicated this was being handled between Cobre and NMED.

Q. Have you received any word on how this is going to be handled?

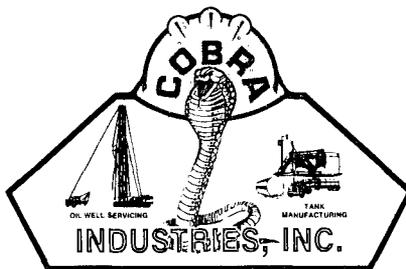


(505) 393-1491

1-800-952-6272

OIL CONSERVATION DIVISION  
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'95 JU 10 AM 8 52



**OIL WELL SERVICING  
TANK MANUFACTURING**

P.O. Box 2040 • Hobbs, New Mexico 88241-2040

LOVINGTON, NM (505) 396-7167

CARLSBAD, NM (505) 885-1229

JAL, NM (505) 395-2150

MIDLAND, TX (915) 520-8734

WICKETT, TX (915) 943-3913

(Monahans)

July 7, 1995

**CERTIFIED MAIL  
RETURN RECEIPT Z 207 037 565**

Mr. Roger C. Anderson  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Dear Mr. Anderson:

Pursuant to our telephone conversation on July 6, 1995, Cobra Industries, Inc. requests that we be allowed to suspend all activity described in discharge plan GW-206.

The United States Environmental Protection Agency inspected our facility on April 26, 1995, and we were notified today that their compliance recommendations will be ready in a few weeks.

We have already spent an excess of \$10,000 on chemical analysis and housekeeping. We would prefer to coordinate our efforts and our dollars to comply with both state and federal recommendations.

Sincerely,

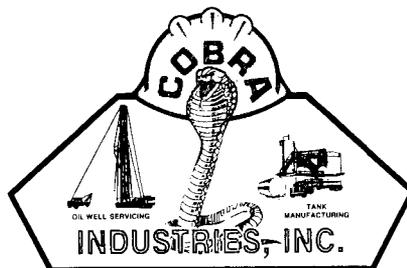
Harold Ogle

**RECEIVED**

**JUL 10 1995**

Environmental Bureau  
Oil Conservation Division

(505) 393-1491  
1-800-952-6272



LOVINGTON, NM (505) 396-7167  
JAL, NM (505) 395-2150  
MIDLAND, TX (915) 520-8734  
WICKETT, TX (915) 943-3913  
(Monahans)

**OIL WELL SERVICING  
TANK MANUFACTURING**

P.O. Box 2040 • Hobbs, New Mexico 88241-2040

**RECEIVED**

**JUL 10 1995**

Environmental Bureau  
Oil Conservation Division

July 6, 1995

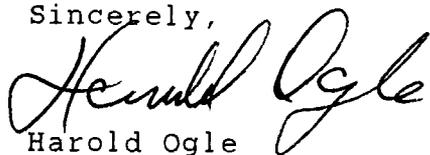
Mr. Pat Sanchez  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Dear Pat,

Thank you for the guidelines on bioremediation you sent us. They are most helpful.

I am enclosing the addendum to our proposed discharge plan GW-206, and a check for the filing fee.

Sincerely,

  
Harold Ogle

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/1/95,  
or cash received on 7/10/95 in the amount of \$ 50.00  
from Cobra Industries,  
for Hobbs Service Facility GW-206  
(Facility Name) (DP No.)  
Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Submitted to ASD by: Raymond Anderson Date: 7/10/95  
Received in ASD by: (signature) Date: 7-11-95

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



COBRA INDUSTRIES, INC.

P.O. BOX 2040  
HOBBS, NEW MEXICO 88241-2040  
TELEPHONE 505/393-1491

LEA COUNTY STATE BANK  
HOBBS, NEW MEXICO 95-183 / 1122

CHECK DATE	CHECK NO.
7/01/95	[redacted]

VOID AFTER 90 DAYS

CHECK AMOUNT
50.00

COBRA INDUSTRIES, INC.

(Signature)

PAY TO  
ORDER  
OF:

Oil Conservation Division



COBRA INDUSTRIES, INC. ■ P.O. BOX 2040 ■ HOBBS, NEW MEXICO 88241-2040



INVOICE NO.	INVOICE DATE	REFERENCE	INVOICE AMOUNT	DISCOUNT	PAYMENT AMOUNT
FEE <i>GW-206</i>	7/01/95		50.00		50.00
CHECK NO.	VENDOR NUMBER	SEQUENCE NUMBER			
	00950		<b>TOTALS</b> ▶	50.00	50.00

COBRA INDUSTRIES, INC.

WASTE DISCHARGE PLAN

ADDENDUM

July 6, 1995

ITEM VII. (I)

Further testing of the Oil/Water Separator contents show that the sludge, which is at the bottom of the separator, is not hazardous by flash point. The oil floating on the surface, sampled June 29, 1995, has a flash point of 133° F. I have been advised to contact Mr. Coby Muckelroy at the NMED Hazardous and Radioactive Materials Bureau for direction regarding disposal of this waste. A copy of the report is attached.

ITEM XII. Site Characteristics

Attached is a copy of the well record for the water well located at our facility, giving the hydrologic information.

ITEM XIII.

Domestic water wells located within a one-quarter mile radius of our facility are listed below by the State Engineer Office file number, and a photocopy of the area map is enclosed.

L-01196  
L-03760  
L-01998  
L-04758  
L-07247  
L-01513  
L-02591  
L-04612  
L-05687  
L-01071  
L-02405  
L-03223  
L-07608

The City of Hobbs Utilities Department informed us that the nearest public water supply well is two and one-half miles east of our facility.

COBA INDUSTRIES

Bensing Park

Jefferson Sch

Park

Bender Park

WT. Refinery

NE

NW

3620

5

3611

Gravel Pits

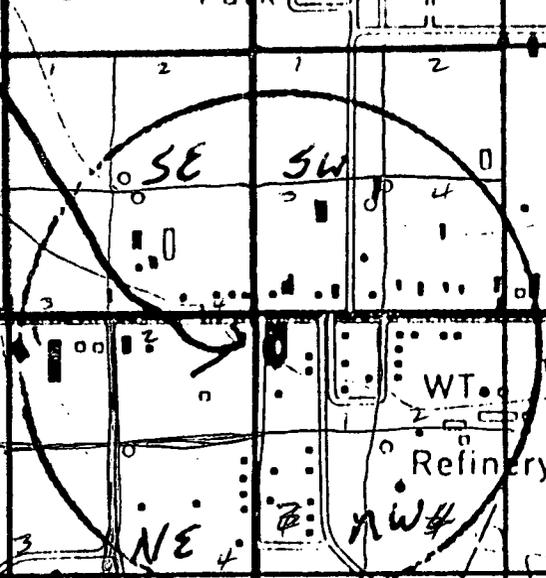
Radio Tower

PIPELINE

GRIMES ST

P. OLECHOS

ST. BRO.





**ARDINAL  
LABORATORIES**

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

**ANALYTICAL RESULTS FOR  
COBRA INDUSTRIAL  
ATTN: HAROLD OGLE  
PO BOX 2040  
HOBBS, NM 44240  
FAX TO: 505-393-4191**

Receiving Date: 06/28/95  
Reporting Date: 06/29/95  
Project Number: H2081  
Project Name: NONE GIVEN  
Project Location: NONE GIVEN

Analysis Date: 06/29/95  
Sampling Date: 06/28/95  
Sample Type: LIQUID  
Sample Condition: INTACT  
Sample Received By: GAP  
Analyzed By: GAP

LAB NUMBER	SAMPLE ID	IGNITABILITY (°F)
H2081-1	SLUDGE	>140
H2081-2	OIL	133
Quality Control		NR
True Value QC		NR
% Accuracy		NR
Relative Percent Difference		NR

METHOD: SW 846-1010

  
\_\_\_\_\_  
Gayle A. Potter, Chemist

06/29/95  
\_\_\_\_\_  
Date

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

STATE ENGINEER OFFICE  
WELL RECORD

FIELD DATA LOG

Section 1. GENERAL INFORMATION

(A) Owner of well A- Welder & Supply Owner's Well No. L-8317  
Street or Post Office Address Box 1100  
City and State Hobbs N.M. 88240

Well was drilled under Permit No. L-8317 and is located in the:

a. NW ¼ NW ¼ NW ¼ of Section 4 Township 19-S Range 38-E N.M.P.M.

b. Tract No. \_\_\_\_\_ of Map No. \_\_\_\_\_ of the \_\_\_\_\_

c. Lot No. \_\_\_\_\_ of Block No. \_\_\_\_\_ of the \_\_\_\_\_  
Subdivision, recorded in Sea County.

d. X= \_\_\_\_\_ feet, Y= \_\_\_\_\_ feet, N.M. Coordinate System \_\_\_\_\_ Zone in the \_\_\_\_\_ Grant.

(B) Drilling Contractor DC Rocky Buford <sup>under</sup> W.L. Van Hoy License No. WD: 208

Address Box 3109 Jones Lane Hobbs

Drilling Began Aug 10-80 Completed Aug 14-80 Type tools cable Size of hole 10 in.

Elevation of land surface or flat at well is \_\_\_\_\_ ft. Total depth of well 150 ft.

Completed well is  shallow  artesian. Depth to water upon completion of well 50 ft.

Section 2. PRINCIPAL WATER-BEARING STRATA

Depth in Feet		Thickness in Feet	Description of Water-Bearing Formation	Estimated Yield (gallons per minute)
From	To			
<u>50</u>	<u>150</u>	<u>100</u>		

Section 3. RECORD OF CASING

Diameter (inches)	Pounds per foot	Threads per in.	Depth in Feet		Length (feet)	Type of Shoe	Perforations	
			Top	Bottom			From	To
<u>4</u>	<u>p.v.c.</u>		<u>0</u>	<u>150</u>	<u>150</u>	<u>open</u>	<u>140</u>	<u>150</u>

Section 4. RECORD OF MUDDING AND CEMENTING

Depth in Feet		Hole Diameter	Sacks of Mud	Cubic Feet of Cement	Method of Placement
From	To				

Section 5. PLUGGING RECORD

Plugging Contractor \_\_\_\_\_

Address \_\_\_\_\_

Plugging Method \_\_\_\_\_

Date Well Plugged \_\_\_\_\_

Plugging approved by: \_\_\_\_\_

State Engineer Representative

No.	Depth in Feet		Cubic Feet of Cement
	Top	Bottom	
1			
2			
3			
4			

FOR USE OF STATE ENGINEER ONLY

Date Received March 3, 1981

Quad \_\_\_\_\_ FWL \_\_\_\_\_ FSL \_\_\_\_\_

File No. L-8317 Use DTC Location No. 19.38.4.11331





STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

June 29, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-718**

Mr. Harold Ogle  
Compliance Manager  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, NM 88240-2040

**RE: Discharge Plan GW-206  
Cobra Industries, Inc., Hobbs facility  
Lea County, New Mexico**

Dear Mr. Ogle:

The NMOCD has evaluated the analysis results for the wash out sump described in the proposed discharge plan GW-206. The results indicate the sump waste is classified as a RCRA subtitle C hazardous waste. The NMOCD would recommend that Cobra Industries, Inc. contact Mr. Coby Muckelroy with NMED Hazardous and Radioactive Materials Bureau at (505)-827-4308 for direction regarding proper disposal of this waste. This waste tested characteristically hazardous with a flash point of 88°F in the analysis submitted by Cobra Industries, Inc. on June 9, 1995.

If you have any questions, please feel free to call me at (505)-827-7152 or Patricio W. Sanchez at (505)-827-7156.

Sincerely,

  
Roger C. Anderson  
Environmental Bureau Chief

RCA/pws

XC: Mr. Wayne Price - NMOCD Hobbs  
Mr. Coby Muckelroy - NMED Hazardous and Radioactive Materials Bureau

Z 765 962 718



**Receipt for  
Certified Mail**

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

PS Form 3800, March 1993

Sent to <i>Harold Ogle</i>	
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	



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 10:00 AM	Date 6/28/95
---	-----------------------------------	------------------	-----------------

Originating Party Harold OGLE - Cobra	Other Parties Pat Sanchez NMOC
--	--------------------------------------

Place Discharge Plan GW-206 - Cobra Industries

CLASS Letter sent by NMOC dated 23, June 1995 by Pat Sanchez Requesting clarifications.

1) Discussed Hydro/Geo. data - Harold will send - Harold also thinking about testing his water well.

2.) Discussed Swamp sludged that tested Hazardous by F.P. characteristic - Harold said he was going to retest layers and check with Lea County septic "GATOR" and find out what is being done with the sludge/liquid mixture. I told him this is a big problem because of Hazardous waste by F.P. characteristic.

Conclusions or Agreements Harold will send info requested in June 28, 1995 letter. Also Note Chris E. & Bill Olson have told me in the past that Cardinal lab is not very reliable - So maybe they misread the flash point.

Signature Signed *Robert W. Jones*



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

June 23, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-716**

Mr. Harold Ogle  
Compliance Manager  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, NM 88240-2040

**RE: Discharge Plan GW-206**  
**Cobra Industries, Inc., Hobbs facility**  
**Lea County, New Mexico**

Dear Mr. Ogle:

The NMOCD has received the proposed Cobra Industries discharge plan application for the facility located in NW/4 NW/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. The NMOCD has prepared and sent out the public notice for the Cobra Industries facility as stated in WQCC section 3-108 and has performed a preliminary review of the discharge plan as proposed by Cobra Industries as received by the OCD on June 13, 1995.

The following comments and request for additional information are based on the review of the Cobra Industries application. **Please note that unless otherwise stated, response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.**

Refer to the application package as submitted by Cobra Industries signed by Mr. Harold Ogle on June 9, 1995.

- A. UNDER ITEM VII.(I.) - How does Cobra Industries, Inc. propose to dispose this sludge that tested hazardous by flash point? Does the NMED permit that Lea county septic have allow them to receive hazardous waste?

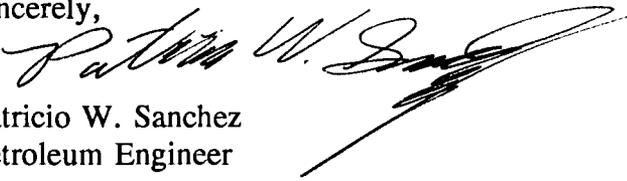
Mr. Harold Ogle  
June 23, 1995  
Page 2

- B. UNDER ITEM XII. - The NMOCD has still not received the data mentioned in part A.
- C. UNDER ITEM XIII. - Include the enclosed information as part of the discharge plan- these will help Cobra Industries in addressing the proposed remediation.
- D. The OCD has not received the filing fee or flat fee as described in the requirement letter from OCD dated February 7, 1995.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,

  
Patricio W. Sanchez  
Petroleum Engineer

xc: Mr. Wayne Price-Environmental Engineer

STATE OF NEW MEXICO

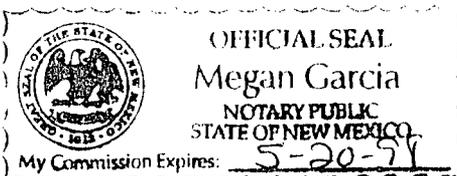
County of Bernalillo SS

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 19th day of June, 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 20th day of June 1995

PRICE \$37.33 Statement to come at end of month.



Megan Garcia

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

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 applications has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131: (GW-205)-CORROSION LTD., MR. TOMMIE FARRELL, PO BOX 5097, Hobbs, NM 88241-5097 has submitted a Discharge plan application for their Hobbs facility located in the SW/4 NE/4, Section 04, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface 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. (GW-206)-COSPA INDUSTRIES, INC., MR. HAROLD OGLE, P.O. BOX 2540, Hobbs, NM 88241 has submitted a Discharge plan application for their Hobbs facility located in the NW/4 NW/4, Section 4, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface 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 of the address given above. The discharge plan application may be viewed at the above address between 8:00 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 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 13th day of June, 1995. STATE OF NEW MEXICO OIL CONSERVATION DIVISION s/WILLIAM J. LEMAY, Director Journal: June 19, 1995.



**GUIDELINES**

**FOR**

**REMEDICATION**

**OF**

**LEAKS, SPILLS AND RELEASES**

(AUGUST 13, 1993)

New Mexico Oil Conservation Division

## INTRODUCTION

The following document is to be used as a guide on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

**\*\*\*\* Note:** Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.

V.

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FINAL CLOSURE

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FINAL REPORT

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  - A. RESPONSIBLE PARTY AND LOCAL CONTACT
  - B. FACILITY
  - C. TIME OF INCIDENT
  - D. DISCHARGE EVENT
  - E. TYPE OF DISCHARGE
  - F. QUANTITY
  - G. SITE CHARACTERISTICS
  - H. IMMEDIATE CORRECTIVE ACTIONS
- II. INITIAL RESPONSE ACTIONS
  - A. SOURCE ELIMINATION AND SITE SECURITY
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  - C. SITE STABILIZATION
- III. SITE ASSESSMENT
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      - b. Recommended Remediation Level
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**I. NOTIFICATION OF LEAK, SPILL OR RELEASE**

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

**A. RESPONSIBLE PARTY AND LOCAL CONTACT**

The name, address and telephone number of the person/persons in charge of the facility/operation as well as the owner and/or operator of the facility/operation and a local contact.

**B. FACILITY**

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

**C. TIME OF INCIDENT**

The date, time and duration of the incident.

**D. DISCHARGE EVENT**

A description of the source and cause of the incident.

**E. TYPE OF DISCHARGE**

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

**F. QUANTITY**

The known or estimated volume of the discharge.

**G. SITE CHARACTERISTICS**

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

**H. IMMEDIATE CORRECTIVE ACTIONS**

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

## **II. INITIAL RESPONSE ACTIONS**

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

### **A. SOURCE ELIMINATION AND SITE SECURITY**

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

### **B. CONTAINMENT**

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

### **C. SITE STABILIZATION**

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

## **III. SITE ASSESSMENT**

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

### **A. GENERAL SITE CHARACTERISTICS**

#### **1. Depth To Ground Water**

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowest contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

**2. Wellhead Protection Area**

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

**3. Distance To Nearest Surface Water Body**

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

**B. SOIL/WASTE CHARACTERISTICS**

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

**1. Highly Contaminated/Saturated Soils**

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

## 2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

\*\*\*\*

(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA Subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA Subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)

### C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

## IV. SOIL AND WATER REMEDIATION ACTION LEVELS

### A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

#### 1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. **Unsaturated Contaminated Soils**

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

<u>Depth To Ground Water</u>	<u>Ranking Score</u>
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source, or;	
<200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	<u>Total Ranking Score</u>		
	<u>&gt;19</u>	<u>10 - 19</u>	<u>0 - 9</u>
<u>Benzene (ppm) *</u>	10	10	10
<u>BTEX (ppm) *</u>	50	50	50
<u>TPH (ppm) **</u>	100	1000	5000

\* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

\*\* The contaminant concentration for TPH is the concentration above background levels.

**B. GROUND WATER**

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

**V. SOIL AND WATER SAMPLING PROCEDURES**

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents be required based upon the nature of the contaminant which was leaked, spilled or released.

**A. HIGHLY CONTAMINATED OR SATURATED SOILS**

The following method is used to determine if soils are highly contaminated or saturated:

**1. Physical Observations**

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

**B. UNSATURATED CONTAMINATED SOILS**

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

**1. Soil Sampling Procedures for Headspace Analysis**

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (ie. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD procedures are as follows:

- a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.
- b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).
- c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.
- d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

## 2. Soil Sampling Procedures For Laboratory Analysis

### a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

- i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.
- ii) Label the samples with a unique code for each sample.
- iii) Cool and store samples with cold packs or on ice.
- iv) Promptly ship sample to the lab for analysis following chain of custody procedures.
- v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

### b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

- i) Benzene, toluene, ethylbenzene and xylene
  - EPA Method 602/8020
- ii) Total Petroleum Hydrocarbons
  - EPA Method 418.1, or;
  - EPA Method Modified 8015

## C. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

**1. Monitor Well Installation/Location**

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

**2. Monitor Well Construction**

a) Monitor well construction materials should be:

- i) selected according to industry standards;
- ii) chemically resistant to the contaminants to be monitored; and
- iii) installed without the use of glues/adhesives.

b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

**3. Monitor Well Development**

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

**4. Sampling Procedures**

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

- a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.
- b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.
- c) Label the sample containers with a unique code for each sample.
- d) Cool and store samples with cold packs or on ice.
- e) Promptly ship sample to the lab for analysis following chain of custody procedures.
- f) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

#### 5. Ground Water Laboratory Analysis

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

##### a. Analytical Methods

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;

- Various EPA 7000 series methods

**VI. REMEDIATION**

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

**A. SOIL REMEDIATION**

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

**1. Contaminated Soils**

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

- a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;
- b) Excavated to the maximum depth and horizontal extent practicable. Upon reaching this limit a sample should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants, or;
- c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;
- d) Managed according to an approved alternate method.

## 2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

### a. Disposal

Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

### b. Soil Treatment and Remediation Techniques

#### i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

#### ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

#### iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

## B. GROUND WATER REMEDIATION

### 1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

**VII. TERMINATION OF REMEDIAL ACTION**

Remedial action may be terminated when the criteria described below have been met:

**A. SOIL**

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

**B. GROUND WATER**

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

### **VIII. FINAL CLOSURE**

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

### **IX. FINAL REPORT**

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

**APPENDIX A**

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

**APPENDIX B**

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge; and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agent, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.

B. Exempt from the requirements of this section are continuous or periodic discharges which are made;

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies.

C. As used in this section:

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water;

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes;

4. "operator" means the person or persons responsible for the overall operations of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

D. Notification of discharge received pursuant to this regulation or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.

## APPENDIX C

**TELEPHONE LISTING OIL CONSERVATION  
FAX NO. 827-8177**

**MAIN LINE - 827-7131**

**DIRECTOR'S OFFICE:**

William LeMay 827-7132  
Florene Davidson 827-7132  
Sally Martinez 827-7133

**GAS MARKETING**

Ron Merrett 827-7146  
Lyn Hebert 827-1364  
Dorothy Phillips 827-7137  
Angela Romero 827-7148  
Chris Williams 827-7149

**ADMINISTRATIVE BUREAU**

Edwin Martin 827-7151  
Mary Anaya 827-7150  
Lupe Sherman 827-7178

**ENVIRONMENTAL BUREAU**

Roger Anderson 827-7152  
Mark Ashley 827-7155  
Pat Sanchez 827-7156  
Chris Eustice 827-7153  
William Olson 827-7154  
Mobil No. 660-1067

**RECORDS CENTER**

Elizabeth Roybal 827-8164  
Lawrence Romero 827-8166

**HEARING ROOM - 827-7082**

**LEGAL BUREAU**

Rand Carroll 827-8156  
Diane Richardson 827-8153

**ENGINEERING BUREAU**

David Catanach 827-8184  
Roy Johnson 827-8198  
Michael Stogner 827-8185  
Ben Stone 827-8186  
Kathy Valdes 827-8182  
Vacant 827-8183

**KEY ENTRY SECTION**

Becky Espy 827-8194  
Rick Brown 827-1363  
Fran Chavez 827-7158  
Dolly Huffman 827-8196  
Isabel Montoya 827-8195  
Lynn Rivera 827-8197  
Andrea Lauber 827-1362

**ONGARD IMPLEMENTATION**

Ed Martin 827-7151

**DISTRICT OFFICES**

Aztec 334-6178  
Artesia 748-1283  
Hobbs 393-6161

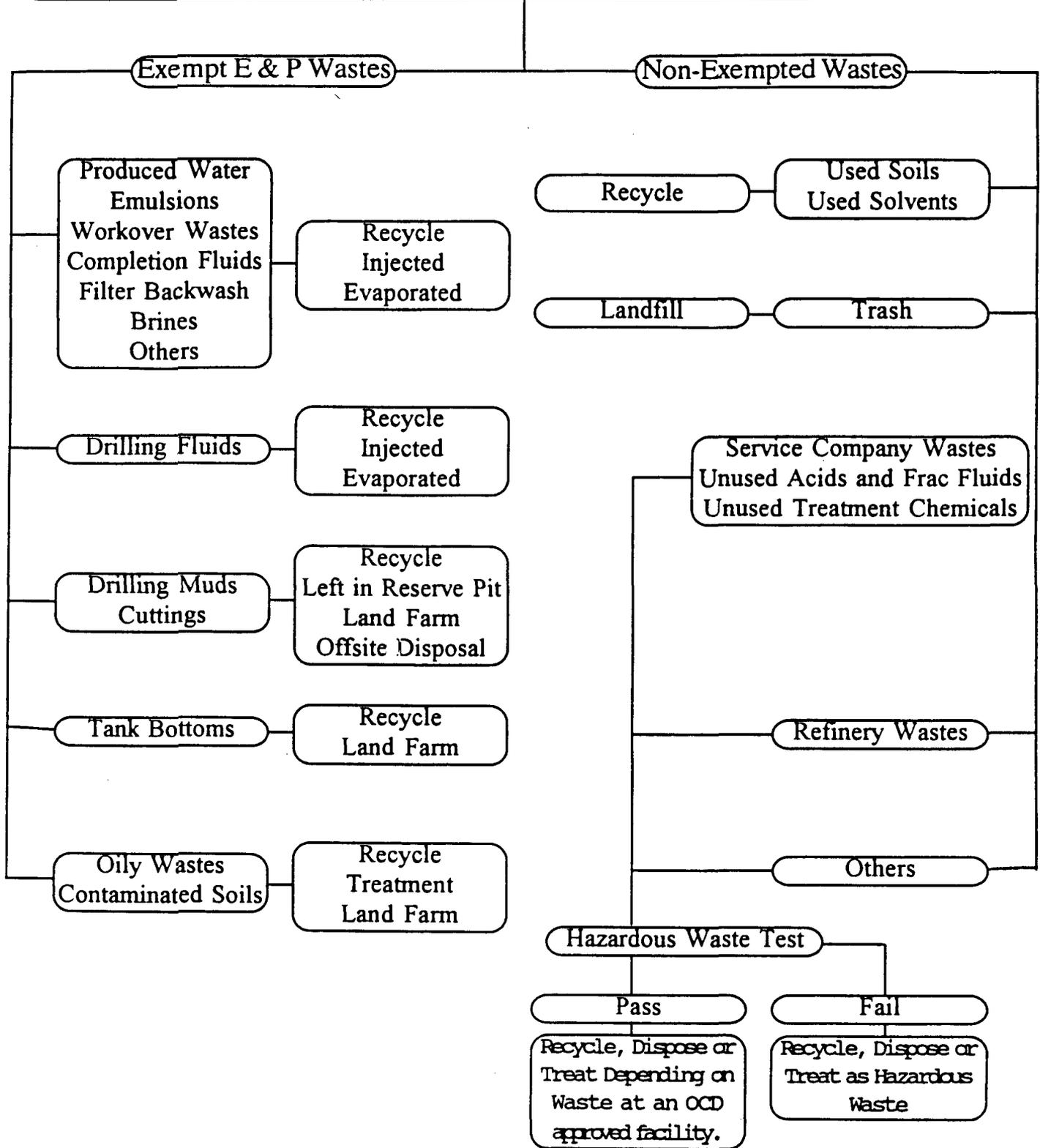
**FAX NOS. FOR DISTRICTS**

AZTEC 334-6170  
ARTESIA 748-9720  
HOBBS 393-0720

# New Mexico OIL FIELD WASTES

## CATEGORIES AND DISPOSAL METHODS

### OIL AND GAS EXPLORATION AND PRODUCTION WASTES



*Please contact the Oil Conservation Division concerning any waste or disposal methods not listed.*

## EPA WASTE CLASSIFICATION O & G EXPLORATION AND PRODUCTION WASTES\*

Oil and Natural Gas Exploration and Production Materials and Wastes Exempted by EPA from Consideration as "Hazardous Wastes" (provided non-exempt waste which is or may be "hazardous" has not been added):

Materials and Wastes Not Exempted (may be a "hazardous waste" if tests or EPA listing define as "hazardous") \*\*:

- Produced water;
- Drilling fluids;
- Drill cuttings;
- Rigwash;
- Drilling fluids and cuttings from offshore operations disposed of onshore;
- Geothermal production fluids;
- Hydrogen sulfide abatement wastes from geothermal energy production;
- Well completion, treatment, and stimulation fluids;
- Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste;
- Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments;
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes;
- Workover wastes;
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves;
- Gas plant sweetening wastes for sulfur removal, including amines, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge;
- Cooling tower blowdown;
- Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream);
- Packing fluids;
- Produced sand;
- Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation;
- Hydrocarbon-bearing soil;
- Pigging wastes from gathering lines;
- Wastes from subsurface gas storage and retrieval, except for nonexempt wastes listed below;
- Constituents removed from produced water before it is injected or otherwise disposed of;
- Liquid hydrocarbons removed from the production stream but not from oil refining;
- Gases from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons;
- Materials ejected from a producing well during the process known as blowdown;
- Waste crude oil from primary field operations and production;
- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment;
- Liquid and solid wastes generated by crude oil and crude tank bottom reclaimers\*\*\*.*
- Unused fracturing fluids or acids;
- Gas plant cooling tower cleaning wastes;
- Painting wastes;
- Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids;
- Vacuum truck and drum rinsate from trucks and drums transporting or containing non-exempt waste;
- Refinery wastes;
- Liquid and solid wastes generated by refined oil and product tank bottom reclaimers\*\*\*;*
- Used equipment lubrication oils;
- Waste compressor oil, filters, and blowdown;
- Used hydraulic fluids;
- Waste solvents;
- Waste in transportation pipeline-related pits;
- Caustic or acid cleaners;
- Boiler cleaning wastes;
- Boiler refractory bricks;
- Boiler scrubber fluids, sludges, and ash;
- Incinerator ash;
- Laboratory wastes;
- Sanitary wastes;
- Pesticide wastes;
- Radioactive tracer wastes;
- Drums, insulation, and miscellaneous solids.

\* Source: Federal Register, Wednesday, July 6, 1988, p. 25,446 - 25,459.

\*\* See important note on 1990 disposal restrictions for non-exempt waste on reverse.

\*\*\* See reverse side for explanation of oil and tank bottom reclaimer listings.

COMMERCIAL SURFACE DISPOSAL FACILITIES

SOUTHEAST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Burro Pipeline	R-3238	Lane Salt Lake S13 T10S R32E	PW	1967
C & C	R-9769-A	S02 T20S R37E	LF	1993
CRI	R-9166	S27 T20S R32E	PW TP S M	1990
Daugherty	R-5464	Crosby Salt Lake S24 T08S R29E S19 T08S R30E	PW	1977
ESSR	---	S01 T26S R31E	LF	1993
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Parabo	R-5516	S29 T21S R38E	PW TP S M	1977 1983
R & R Inc.	---	S05 T02N R01E	PW	1993
Unichem	R-7113	S26 T23S R29E	PW	1982

NORTHWEST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Basin Disposal	---	S03 T29N R11W	PW	1985
Envirotech No. 1	---	S26 T27N R11W	LF	1990
Envirotech No. 2	---	S06 T26N R10W	LF	1992
SWWD	---	S04 T29N R09W	PW	1988
Sunco	R-9485-A	S02 T29N R12W	PW	1991
TNT Construction	---	S08 T25N R03W	PW LF	1990 1992
Tierra	R-9772	S02 T29N R12W	LF	1992

PW - Produced Water  
TP - Waste Oil Treating Plant  
S - Solids  
LF - Landfarm (Solids)  
M - Drilling Muds

**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 applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-205) -CORROSION LTD., MR. TOMMIE FARRELL, P.O. BOX 5097, Hobbs, NM, 88241-5097 has submitted a Discharge plan application for their Hobbs facility located in the SW/4 NE/4, Section 04, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface 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.**

**(GW-206) -COBRA INDUSTRIES, INC., MR. HAROLD OGLE, P.O. BOX 2040, Hobbs, NM, 88241 has submitted a Discharge plan application for their Hobbs facility located in the NW/4 NW/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface 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.

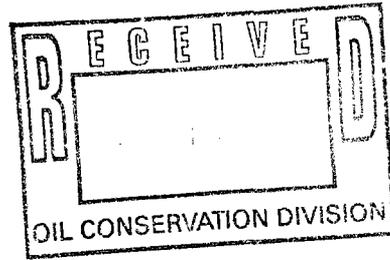
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of June, 1995.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

by  Deputy Director

WILLIAM J. LEMAY, Director

S E A L



**RECEIVED**

JUN 13 1995

Environmental Bureau  
Oil Conservation Division

**Cobra Industries, Inc.**

**Waste Discharge Plan**

State of New Mexico  
Energy, Minerals and Natural Resources Department  
OIL CONSERVATION DIVISION  
2040 Pacheco  
Santa Fe, NM 87505

DISCHARGE PLAN APPLICATION FOR OILFIELD SERVICE FACILITIES  
(Refer to OCD Guidelines for assistance in completing the application)

- I. TYPE: Oil & Gas Well Servicing - Tank Manufacturing
- II. OPERATOR: Cobra Industries, Inc.  
ADDRESS: 720 Texaco Road Hobbs, NM 88240  
CONTACT PERSON: Harold Ogle PHONE: (505) 393-1491
- III. LOCATION: NW 1/4 NW1/4 Section 4 Township 19 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.
- VI. ATTACH A DESCRIPTION OF ALL MATERIALS STORED OR USED AT THE FACILITY.
- 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 PROCEDURE.
- IX. ATTACH A DESCRIPTION OF PROPOSED MODIFICATIONS TO EXISTING COLLECTION/TREATMENT/ DISPOSAL SYSTEM.
- 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 EVIDENT 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: Harold Ogle Title: Compliance Manager

Signature: Harold Ogle

Date: 6-9-95

- I. TYPE OF OPERATION  
Oil and Gas Well Servicing and Tank Manufacturing.
- II. NAME OF OPERATOR AND LOCAL REPRESENTATIVE  
Cobra Industries, Inc.  
720 Texaco Rd.  
Hobbs, NM 88240  
Contact: Harold Ogle Phone: (505) 393-1491
- III. LOCATION OF DISCHARGE  
NW 1/4 NW 1/4 Section 4 Township 19 S Range 38 E
- IV. NAME AND ADDRESS OF THE LANDOWNER  
Cobra Industries, Inc.  
P.O. Box 2040  
Hobbs, NM 88240-2040
- V. DESCRIPTION OF FACILITY  
The facility is a shop, office, and parking area. Well servicing units are serviced, repaired, and parked on site. This facility is also used as an oilfield tank manufacturing and repair site.
- VI. MATERIALS STORED OR USED AT THIS FACILITY
  - A. Drilling Fluids - NONE
  - B. Brines - NONE
  - C. Acids/Caustics - Muriatic Acid Liquid in plastic one gallon containers. Normally not more than two gallons stored in the steam cleaner room.
  - D. Detergents/Soaps - NONE
  - E. Solvents and Degreasers
    - 1. Safety-Kleen Premium Solvent 6605 liquid parts cleaner stored in drums with parts washer vats situated on the tops of the drum. 60 gallons stored in the main shop.
    - 2. Safety Kleen 105 Solvent - Recycled liquid parts cleaner stored in a drum with a parts washer vat situated on the top of the drum. 30 gallons stored in the unit shop.
  - F. Paraffin Treatment/Emulsion Breakers - NONE
  - G. Biocides - NONE

## VII. CONTINUED

## H. Others

1. Lubricating Fluids
  - a. Motor Oil - Liquid in five gallon metal cans and one quart plastic containers stored in the main shop.
  - b. Hydraulic and Transmission Fluid - Liquid in five gallon metal cans stored in the main shop.
  - c. Chain Oil - Liquid in five gallon metal cans stored in the main shop.
2. Engine Cooling Fluid - Ethylene Glycol Anti-Freeze liquid in metal drums stored in the main shop.
3. Diesel Fuel - Liquid in tanks at the south side of the yard (see diagram).
4. Propane - Liquefied petroleum gas. Compressed gas in a tank at the south side of the yard (see diagram).
5. Methanol - Liquid stored in an above-ground horizontal tank at the south side of the yard (see diagram).
6. Paint and Thinners - Liquid in metal cans stored in the unit shop.
7. Waste Lubricating Fluids - Liquid in a metal tank stored at the north end of the building (see diagram).
8. Sandline Chemical - Liquid stored in metal drum at the north side of the building. MSD sheet attached. Used off-site to coat wire rope.
9. Water Liquid used to hydrostatically test transport tanks and other containers which require Department of Transportation Periodic Pressure Testing. Recycled on site (see diagram).
10. Red Rags - Cloth wipes for hands, parts, etc.

VII. SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS GENERATED AT THE FACILITY

- A. Truck Wastes - crude oil, diesel fuel, gasoline from transports tanks 50 gallon per month no additives.
- B. Truck, Tank & Drum Washing - NONE
- C. Steam cleaning of parts, equipment, tanks include in the 50 gallons per month from tank wastes no additives.
- D. Solvent or Degreaser - NONE Generated - recycled by supplier no additives.
- E. Spent Acids or Caustics, or Completion Fluids - NONE
- F. Waste Slop Oil - NONE
- G. Waste Lubrication Fluids - used motor oil, used hydraulic & transmission fluid, used chain oil, used gear oil. 65 gallons per month no additives.
- H. Oil Filters, Motors, Transmission, and Hydraulic Systems, 45 filters per month no additives.
- I. Solids & Sludges - From transport tanks and sand & mud from tires & frames no additives 120 gallons per month.
- J. Painting Wastes - NONE
- K. Sewage - separated water from steam bay 39,300 gallons per month no additives.
- L. Used Antifreeze - Ethylene Glycol - water mixture - from routine maintenance 5 gallons per month no additives.
- M. Other Waste Solids - scrap metals - office & shop trash, including shipping cartons & packaging, empty paint cans, lubricating fluid drums & cans, and oil absorbent floor cleaner 8500 pounds per month - no additives.

## VIII. CURRENT LIQUID AND SOLID WASTE COLLECTION STORAGE, AND DISPOSAL PROCEDURES

## A. Summary Information

1. Tank wastes - into a concrete-lined, sloped trench and on to a concrete lined two-stage oil/water separator. The water goes into the City of Hobbs sewer system, and the oil is taken off-site by Lea County Septic Tank Service to its disposal facility which is permitted under the NMED DP #884 copies of the drawing of the oil/water separator and the NMED DP #884 are attached, as is a drawing showing the location of the separator.
2. Truck, Tank and Drum Washing - NONE
3. Steam Tanks to Purge Vapors - The spent steam (water) goes into the trench and separator described in item 1.
4. Solvents and Degreasers - In drums with a parts cleaning vat attached. The solvents are in a closed system and are recycled by the supplier. MSD sheets are attached.
5. Spent Acids, Caustics and Completion Fluids - Muriatic acid is used to purge scale and corrosion through the steam generator piping system. It is used in periodically at the ratio of one gallon per 10 gallons of water.
6. Waste Slop Oil - NONE
7. Waste Lubricating and Motor Oils - Drained into and stored in a metal tank. The waste oil is picked up to be recycled for burner fuel. A copy of the manifest used by the recycler is attached.
8. Oil Filters - Drained into the waste oil tank then picked up to be recycled. A copy of the manifest used by the recycler is attached. (The same recycler as in item 7).
9. Solids and Sludges - dirt and sand from motor vehicles going into the steam bay. These solids go into the oil/water separator and are taken off-site by Lea County Septic Tank Service to its facility permitted as NMED DP #884 a copy of the permit is attached.
10. Painting Wastes - NONE

VIII. CONTINUED

11. Sewage - Water and toilet waste to the City of Hobbs sewer system.
12. Used Anti-Freeze - Collected into drums and stored for recycling. A copy of the recycler's manifest is attached.
13. Other Waste Solids -
  - a. Scrap metals are delivered off-site to a metal recylcer.
  - b. Office and shop trash to dumpster for pickup and disposal at the Hobbs landfill.
  - c. Empty Paint Cans - Allowed to dry and then placed in the dumpster for disposal at the Hobbs landfill.
  - d. Lubricating Fluid Drums - Anti-Freeze drums and sandline chemical drums are recycled by suppliers or are delivered off-site to a metal recycler.
  - e. Lubricating Fluid Cans - Delivered off-site to a metal recycler.
  - f. Oil Absorbent Floor Sweep - Stored in metal drums on-site (see diagram) will be delivered to an incinerator for disposal, Brantley Environmental at Odessa, TX is the preferred site.

B. Collection & storage Sites

1. Schematic Attached
2. Schematic Attached
3. Not Applicable

C. On-Site Facilities

1. NONE
2. NONE

IX. PROPOSED MODIFICATIONS

A. Planned or in Progress

1. Diesel Fuel Storage tanks are presently set in below-grade unlined surface pits. These tanks will be removed and any contaminated soil will be bioremediated. The pits will be filled to grade, stabilized, and a concrete pad will be poured. Two new tanks will be placed on saddles set onto the pad. A concrete wall, recommended by the Hobbs Fire Marshall, will be built around the perimeter of the pad. The tanks will have a total capacity of 16,000 gallons, therefore the concrete containment area will be constructed to hold 21,328 gallons.
2. The concrete pad the waste oil tank sits on is inadequate to insure against contamination. The pad area will be modified and reinforced and curbs will be added to contain small quantities of fluids. The drums will be placed on racks for storage and use. Empty drums will be returned to the supplier. The waste oil tank is set approximately two inches off the pad so that if a leak develops it will be seen during a visual inspection.
3. Non-serviceable Automotive Batteries are recycled by the supplier.
4. The Oil/Water separator has been sampled and analyzed. A copy of that report is attached. Additionally, the overflow pipe to the sewer line was plugged in October 1994 to ensure that waste oils cannot enter the sewer line.
5. Housekeeping - The oil stains on the surface in the parking area will be bioremediated. A plan has been developed and will be implemented in July 1995. The implementation has been delayed because of lack of alternate parking space. Additionally, to date, more than 50 tons of scrap iron & metal has been removed off site to a metal recycler.

B. NONE

X. INSPECTION, MAINTENANCE, AND REPORTING

A. Inspections

1. Oil/Water Separator - This unit is visually checked weekly. No records have been kept. Upon approval of our plan a written record, including dates, will be used and maintained in a file kept in the office of the safety director. Additionally, annual inspections will be performed by removing the contents, cleaning and visually inspecting the separator for cracks or breaks. Records will be maintained in the office of the safety director.
2. Fuel and chemical storage areas will be checked weekly and a written record will be kept in the office of the safety director.
3. In the event of a significant leak the OCD office in Hobbs will be notified immediately by telephone.

E. None

C. Storm water runoff plan attached.

XI. SPILL/ LEAK PREVENTION AND REPORTING PROCEDURES

A. Leaks or spills may be anticipated at the following areas.

1. Fuel Storage - Fuel storage will be contained by a concrete pad and wall sufficient to hold 21,328 gallons.
2. Oil/Water Separator - The floor of the steam rack is approximately 4" above the grade. Additionally, the overflow drain has been plugged.
3. Used Oil Storage Area - The used oil tank is set on a metal frame. The tank is on a concrete pad that will be modified to include curbs for containment.
4. Chemical and Anti-Freeze Storage - This storage area is on the same pad as the waste oil tank. The area will be modified to include curbs for containment.
5. Reporting - Reporting procedures attached.
6. After Hours Emergency Telephone Numbers will be posted on the fence and gates.

REPORTING PROCEDURES  
COBRA INDUSTRIES INC.

IN THE EVENT OF ANY SPILL OR LEAK THE FOLLOWING REPORTING PROCEDURES WILL BE FOLLOWED.

IMMEDIATELY TELEPHONE

DAYTIME -

OCD OFFICE IN HOBBS . . . . .	393-6161
FIRE DEPARTMENT . . . . .	397-9308
COBRA SAFETY DIRECTOR MOBILE . . . . .	369-8199

AFTER HOURS -

OCD OFFICE IN HOBBS . . . . .	393-6161
FIRE DEPARTMENT . . . . .	397-9308
SAFETY DIRECTOR 24 HR . . . . .	393-1491

IN THE EVENT OF A SMALL SPILL THE SAFETY DIRECTOR WILL SUPERVISE THE CLEAN UP AND DISPOSAL WITH APPROVED CONTAINMENT DRUMS.

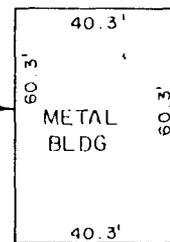
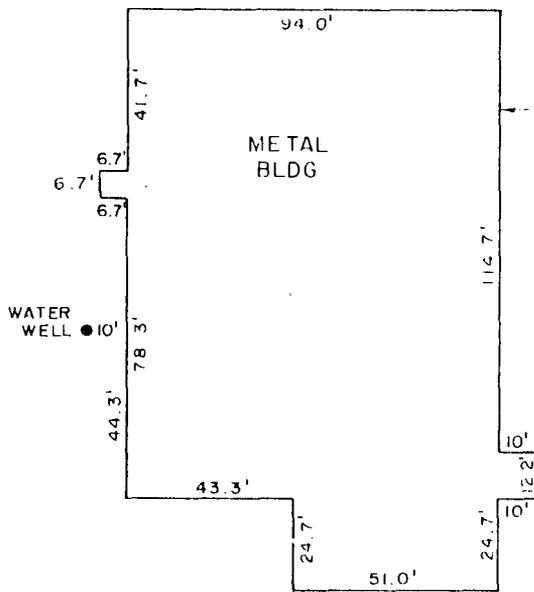
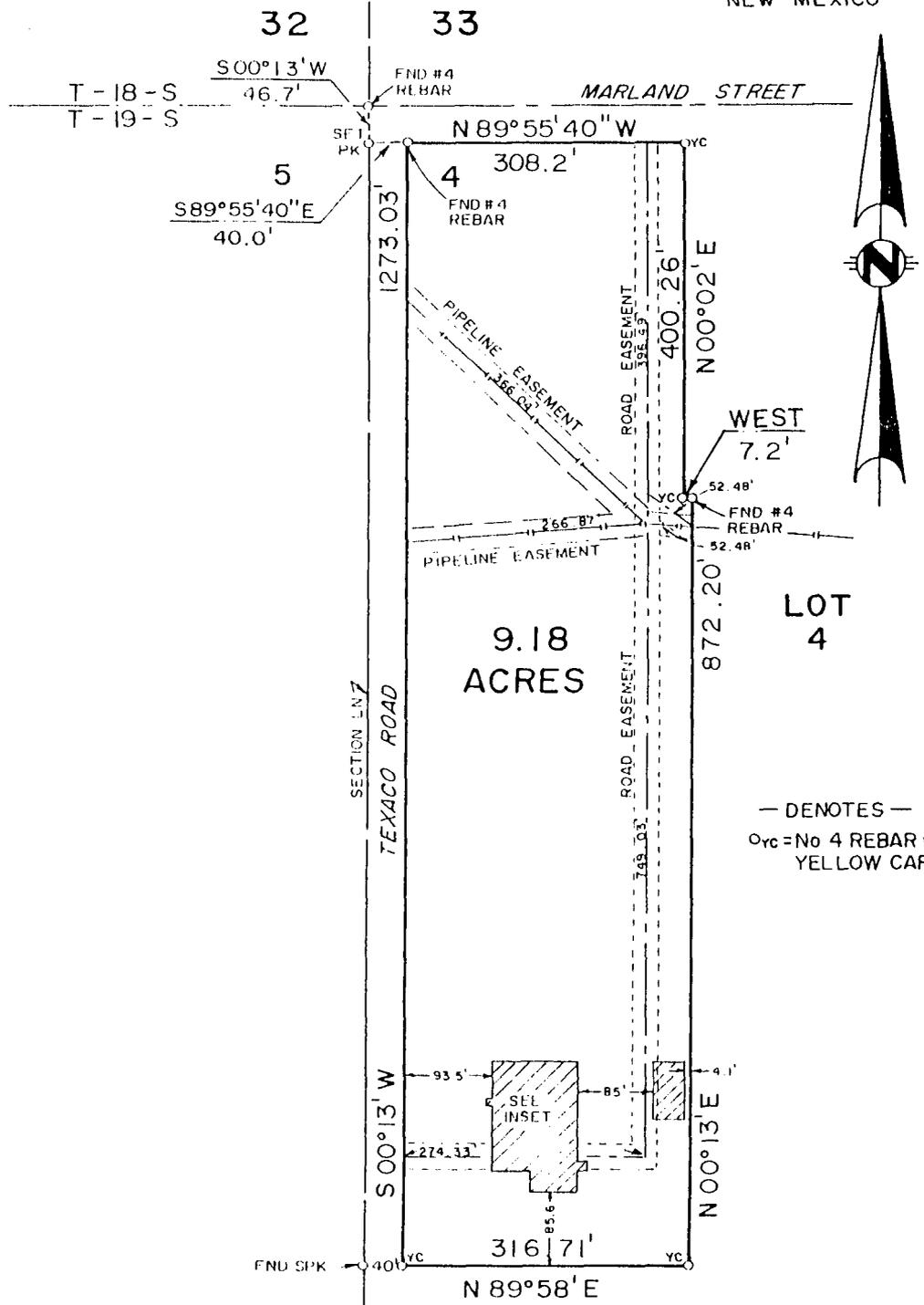
IN THE EVENT OF A SIGNIFICANT SPILL MANAGEMENT WILL CONTACT A LOCAL CONTRACTOR FOR CLEAN UP.

- B. Visual inspection will be performed weekly in the affected areas. Records will be maintained in the office of the safety director.
- C. Not Applicable

XII. SITE CHARACTERISTICS

- A. Hydrologic/Geologic information is being provided by the State Engineers Office and will be forwarded within seven days.
- B. Drilling records from an injection well adjacent to the property are attached.

SECTION 4, TOWNSHIP 19 SOUTH, RANGE 38 EAST, N. M. P. M., LEA COUNTY, NEW MEXICO



INSET  
1" = 50'



I HEREBY CERTIFY THAT THIS PLAT WAS MADE FROM NOTES TAKEN IN THE FIELD IN A BONA FIDE SURVEY MADE UNDER MY SUPERVISION, AND THAT THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

*John W. West*

JOHN W. WEST, N.M. P.E. & L.S. No. 676  
TEXAS R.P.S. No. 1138

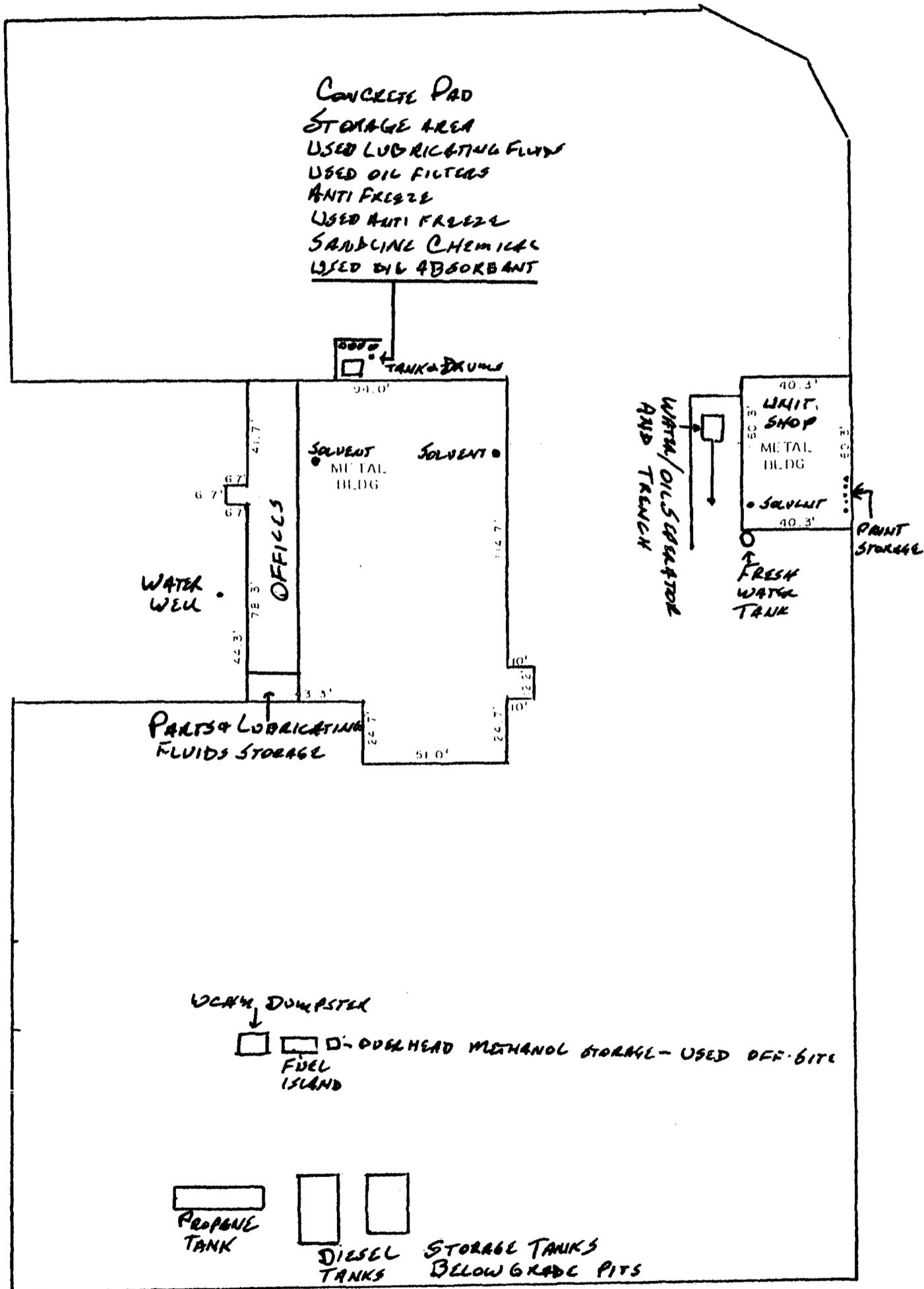
RONALD J. EIDSON, N.M. L.S. No. 3239  
TEXAS R.P.S. No. 1883

A WELDERS AND SUPPLY CO.	
A TRACT OF LAND LOCATED IN LOT 4, SECTION 4, TOWNSHIP 19 SOUTH, RANGE 38 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.	
JOHN W. WEST ENGINEERING COMPANY CONSULTING ENGINEERS HOBBS, NEW MEXICO	
Scale: 1" = 200'	Drawn By: J.W.
Date: 7-13-88	Sheet 1 of 2 Sheets

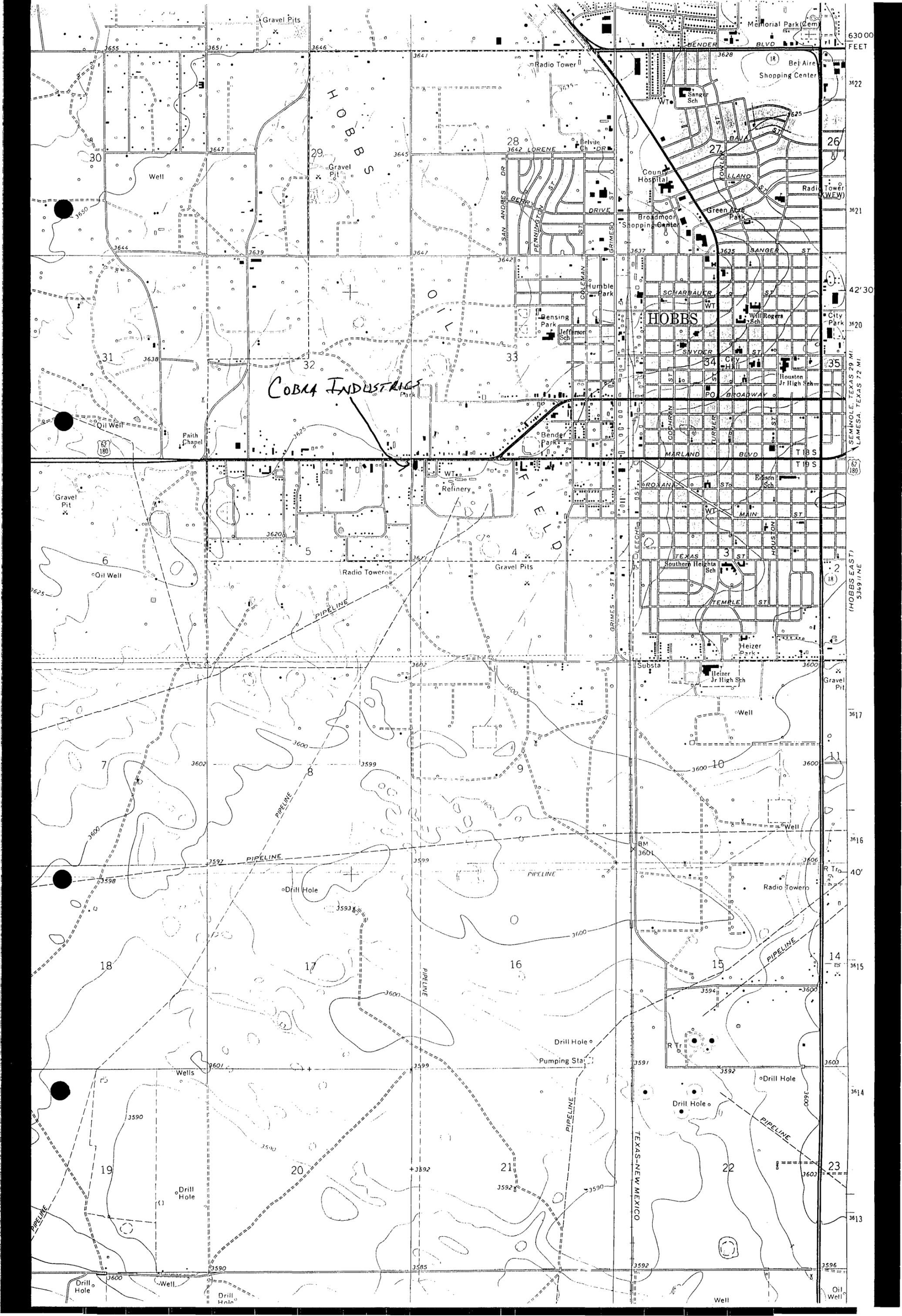
# CORRA INDUSTRIES

6-9-95

## STORAGE AREAS







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SEMINOLE, TEXAS 29 MI.  
LAMESA, TEXAS 72 MI.  
(HOBBS EAST)  
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COBRA INDUSTRIES

HOBBS

TEXAS-NEW MEXICO

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GROUND WATER SECTION  
Groundwater Bureau  
Environment Department  
Santa Fe, N.M. 87503  
(505) 827-2900

SUMMARY OF DISCHARGE PLAN

August 09, 1993

DP number: 884 Facility Name: LEA COUNTY SEPTIC TANK SRV.  
Facility Desc: INDUSTRIAL  
Waste Type: INDUSTRIAL  
Discharge / Treatment: EVAPORATION LAGOON / HYDROCARBON  
REMEDICATION

County: LEA ED District: 4 20S 38E Sec. 14.000

Location: SOUTHEAST OF HOBBS Nearest City: HOBBS

Responsible Person: E. E. TAYLOR Contact or Consultant Person

Title: OWNER

Address: P. O. BOX 703

City, zip: HOBBS NM 88240

Phone: 397-2382

The Ground Water Section staff reviewer is CHRIS WHITMAN .  
Application was received 14-MAY-92 and Public Notice published 21-SEP-92 .  
The plan was approved 09-AUG-93 and expires 09-AUG-98 .  
(Application for renewal should be submitted in ample time before expiration.)

MONITORING REQUIREMENTS SUMMARY

No. of monitoring reports required annually: 2  
Monitoring reports are due no later than: 01-FEB and 01-AUG of each year.

<u>Sampling required</u>	<u>Annual freq.</u>	<u>No of sites</u>	<u>Comments, description</u>
Disch. Vols	2	1	VOLUME DISCHARGED TO EACH POND, SEMI-ANNUALLY.
Organics	1	1	SAMPLES TESTED FOR PURGEABLE ORGANICS BY EPA METHOD 810 AND 8020 YEARLY FOR EACH POND IN USE.
Manifest	2	1	MANIFEST, SEMI-ANNUALLY. EACH TRUCKLOAD SHALL HAVE RECORDED: date of delivery, name of discharging facility(ies), amount and type of waste discharged, pond receiving discharge- -Recorded as delivered, reported 2X/yr.

If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet. Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.

Send monitoring reports to the address at top, "Attention: CHRIS WHITMAN

**E P A MANIFEST RECORD  
NON-HAZARDOUS  
WASTE MANIFEST**

CUSTOMER INVOICE  
NO. 27057

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087

**E & E ENTERPRISES**  
P.O. Box 683  
Brownfield, TX 79316

Please print or type.

<b>GENERATOR'S MAILING ADDRESS</b>	<b>PICK-UP LOCATION</b>	<b>ACCOUNT</b>
<i>Cobra Industrial</i>		NO: _____
<i>720</i>	<i>3. Ferno St</i>	P.O. NO. _____
<i>Webbs</i>		EPA ID NO. _____
GENERATOR'S PHONE NO. <i>(512) 353-491</i>		

**DESCRIPTION OF NON-HAZARDOUS WASTE:**

Type of Waste (Include US DOT Shipping Name, Hazard Class, and ID Number, if applicable)	QUANTITY	Type QTY*	Unit Cost	Total Cost
NON-HAZARDOUS USED OIL	<i>750</i>	<i>F</i>	<i>1/c</i>	
NON-HAZARDOUS USED OIL FILTERS				
USED ANTI-FREEZE				

\*G=Gallons; P=Pounds; T=Tons; D=Drums

TOTAL CHARGE **PAID**

Additional Descriptions of Materials, if necessary

Special Handling Instructions and Additional Information

**GENERATOR CERTIFICATION:** I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.

Print Name of Generator <i>Charles A. Landrum</i>	Signature of Generator <i>Charles A. Landrum</i>	MO. <i>11</i>	DAY <i>10</i>	YR. <i>91</i>
--	---	------------------	------------------	------------------

DESIGNATED FACILITY: TRANSPORTER, STORER AND TREATOR OF MATERIALS

<b>E &amp; E ENTERPRISES</b>	Phone: (806) 637 9336	US EPA ID NO TXD 982 75 6868
P.O. Box 683	1-800-658-2137	TWC Permit NO 41398
Brownfield, TX 79316	(TWC: (512) 463 7727)	TX RR NO 000013747C

**Transporter Acknowledgement of Receipt of Materials**

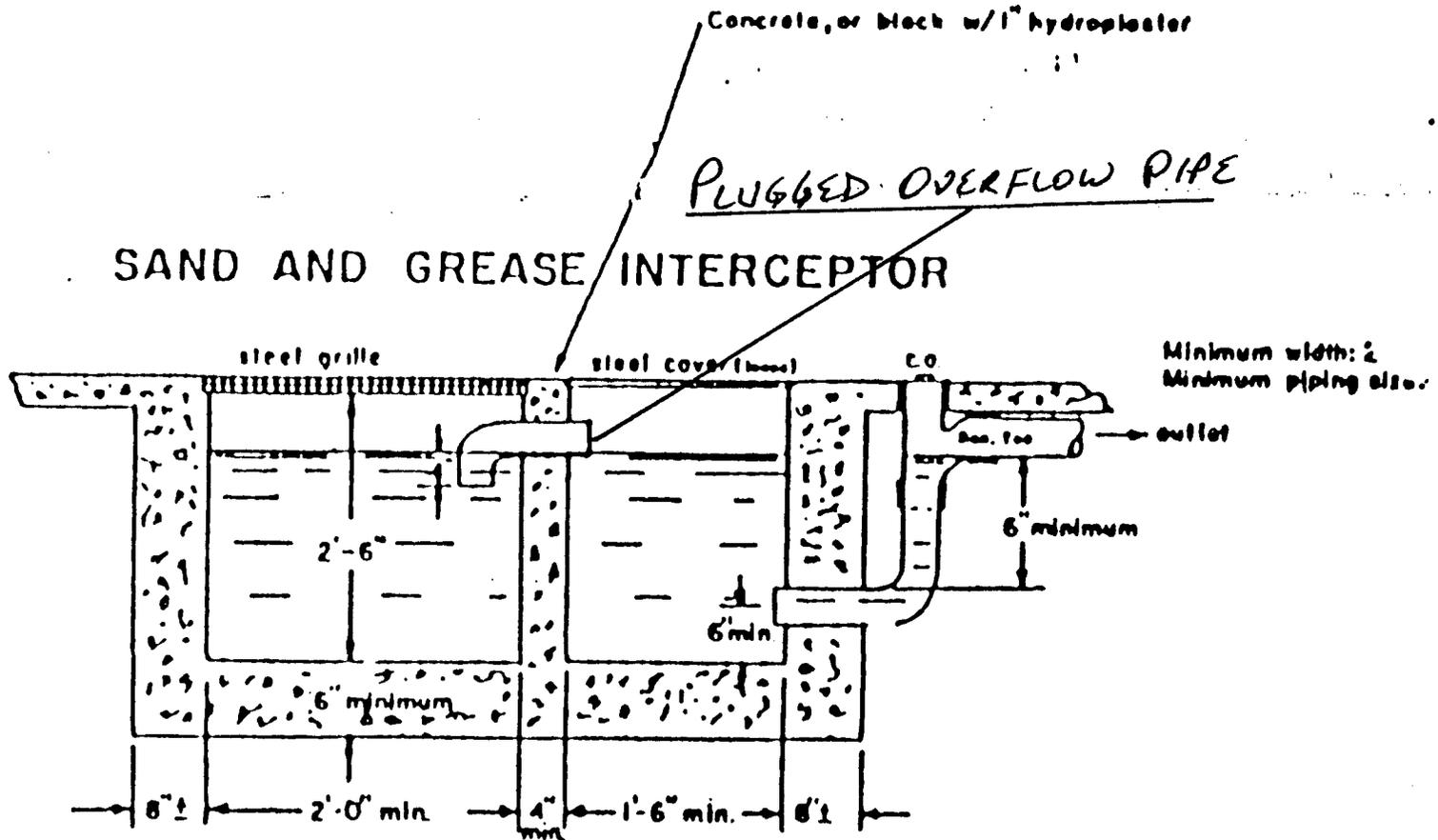
Print Name of Hauler <i>Robert Gonzalez</i>	Signature of Hauler <i>Robert Gonzalez</i>	MO. <i>11</i>	DAY <i>10</i>	YR. <i>91</i>
--	---	------------------	------------------	------------------

Discrepancy Space

**Facility Certification of Receipt of Materials Covered by this Manifest (except as noted above)**

Print Name of Facility Operator	Signature of Facility Operator	MO.	DAY	YR.
---------------------------------	--------------------------------	-----	-----	-----

# OIL/WATER SEPARATOR



Recommendations for Bioremediation Project  
 Kitchell Collins, HICKS  
 Project Name - CALICHE  
 Project Reference ID - 150X20  
 March 21, 1995

CUSTOMER SUPPLIED INFORMATION -----

Area length in feet .....	150
Area width in feet .....	20
Contaminated soil Depth in inches .....	12
Total Area in square feet .....	3,000
Cubic yards contaminated soil .....	111.1
Average TPH Contamination .....	1,000
Target TPH Level .....	200

PRODUCT RECOMMENDATIONS FOR FIRST TREATMENT -----

Calculated Lbs Oil .....	277.75
Add Bio-D (Gallons) .....	1.40
Add Bio-S (Gallons) .....	
Add Medina Activator (Gallons) .....	0.80
Add Hydrocarbon Degrading Bacteria (Lbs) ...	3.00

TOTAL PRODUCT NEEDED FOR 2 MONTHS OF TREATMENT -----

Total Bio-D .....	2.80
Total Bio-S .....	
Total Gals. Medina Activator .....	1.60
Total Hydrocarbon Degrading Bacteria (Lbs) .	3.00

APPLICATION RECOMMENDATIONS -----

\*\* Estimated time for treatment will be 1 to 3 Months. \*\*

For best results move the soil to a contained treatment cell and place it no deeper than you can disc or till.

1. Mix the above recommended amounts of Bio-D and Medina Microbial Activator with water ( 15 gallons of water for each gallon of concentrate) add Bio-D to the water, mix, add the Medina, and mix.
2. If Bacteria is used mix each lb with 1 gallon of clean warm water for 20 minutes, filter solids out and spray on the entire area.
3. Disk or till the area to the target depth to increase the oxygen.
4. Check the soil moisture on a weekly basis, add water when needed.
5. Repeat the tilling, apply Bio-D and Medina Activator bi-weekly.

-----

This information is for project design purposes only.  
 No guarantee is made as to the length of time or extent of cleanup.  
 Each project may vary due to environmental conditions.

Thanks for your interest in our products.  
 Medina Agriculture Products Inc.  
 PO Box 309 Hondo, TX 78861

Submit 3 Copies  
to Appropriate  
District Office

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-103  
Revised 1-1-89

DISTRICT I  
P.O. Box 1980, Hobbs, NM 88240

**OIL CONSERVATION DIVISION**  
P.O. Box 2088

DISTRICT II  
P.O. Drawer DD, Artesia, NM 88210

Santa Fe, New Mexico 87504-2088

DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410

WELL API NO.	30-025-26116
5. Indicate Type of Lease	STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.	

<b>SUNDRY NOTICES AND REPORTS ON WELLS</b> (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	
7. Lease Name or Unit Agreement Name	South Hobbs GSA Unit
1. Type of Well	OIL WELL <input type="checkbox"/> GAS WELL <input type="checkbox"/> OTHER Water Injector
2. Name of Operator	Amoco Production Company (Room 18.108 W1)
8. Well No.	121
3. Address of operator	P.O. Box 3092, Houston, Texas 77253-3092
9. Pool name or Wildcat	Hobbs Grayburg San Andres
4. Well Location	Unit Letter <u>E</u> : <u>1450</u> Feet From The <u>North</u> Line and <u>150</u> Feet From The <u>West</u> Line
	Section <u>4</u> Township <u>19-S</u> Range <u>38-E</u> NMPM Lea, NM County
10. Elevation (Show whether DF, RKB, RT, GR, etc.)	3625' KB

11. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

<b>NOTICE OF INTENTION TO:</b>	<b>SUBSEQUENT REPORT OF:</b>
PERFORM REMEDIAL WORK <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>
PLUG AND ABANDON <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>
CHANGE PLANS <input type="checkbox"/>	PLUG AND ABANDONMENT <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	CASING TEST AND CEMENT JOB <input type="checkbox"/>
OTHER: <input type="checkbox"/>	OTHER: Acidize <input checked="" type="checkbox"/>

12. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work.) SEE RULE 1103.

MIXRU SU (12-29-93) X RTXIB X REL PKR X POH X RIH X BIT X SCRAPER X 2-7/8" WS X TAG. RIH X PPI PKR X 4FT SPACING ACD PERFS 4099-4192 X 3500 GAL 20% NE HCL X ADDITIVES X 50 GAL/FT X MAX TRTP 3600 X AVG TRTP 2000 X AIR 2 BPM. FLUSH X FISH VALVE X REL PKR X POH X LD WS. RIH X INJ PKR X PC TBG. PMP PKR FL X PSA 3822FT X RBXIT. TST PKR X 580 PSI X 30 MIN X OK. RETURN TO INJECTION. RDXMO SU (1-3-94).

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Devina M. Prince TITLE Staff Assistant DATE 01-18-94

TYPE OR PRINT NAME Devina M. Prince TELEPHONE NO. (713) 366-7686

(This space for State Use)

**ORIGINAL SIGNED BY JERRY SEXTON**

APPROVED BY JERRY SEXTON DISTRICT I SUPERVISOR TITLE \_\_\_\_\_ DATE JAN 25 1994

CONDITIONS OF APPROVAL, IF ANY:

NO. OF COPIES RECEIVED		
DISTRIBUTION		
SANTA FE		
FILE		
U.S.G.S.		
LAND OFFICE		
OPERATOR		

5a. Indicate Type of Lease  
State  For

5. State Oil & Gas Lease No.

SUNDRY NOTICES AND REPORTS ON WELLS

(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT -" (FORM C-101) FOR SUCH PROPOSALS.)

OIL WELL  GAS WELL  OTHER

Name of Operator  
Amoco Production Company

Address of Operator  
P. O. Box 68 Hobbs, NM 88240

Location of Well  
UNIT LETTER E 1450 FEET FROM THE North LINE AND 150 FEET FROM  
THE West LINE, SECTION 4 TOWNSHIP 19-S RANGE 38-E NMPM.

7. Unit Agreement Name

8. Farm or Lease Name  
South Hobbs (GSA) Uni

9. Well No.  
121

10. Field and Pool, or Wildcat  
Hobbs GSA

12. County  
Lea

15. Elevation (Show whether DF, RT, GR, etc.)

Check Appropriate Box To Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK

TEMPORARILY ABANDON

PULL OR ALTER CASING

OTHER \_\_\_\_\_

PLUG AND ABANDON

CHANGE PLANS

SUBSEQUENT REPORT OF:

REMEDIAL WORK

COMMENCE DRILLING OPNS.

CASING TEST AND CEMENT JOB

OTHER \_\_\_\_\_

ALTERING CASING

PLUG AND ABANDONMENT

Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any propose work) SEE RULE 1103.

Moved in service unit 1-24-81. Ran cast iron bridge plug and set at 2106'. Ran packer and tubing and set packer at 1514'. Attempted to establish injection rate with water at 1976' but unable to get through. Pulled packer and ran cement retainer and set at 1860'. Cemented with 300 sacks of Class 'C' cement. Drilled out 4234'-65'. Ran 5-1/2" casing to 4268' and cemented with 700 sacks in 2 stages. Perforated 3925'-4240' with 2 SPF. Packer set at 3880' and retrievable bridge plug set at 4257'. Acidized well with 6000 gallons in 3 stages. Installed pumping equipment and returned to production.

0+4-NMOCD, H 1-Hou 1-Susp 1-GPM

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNED Aug Mitchell TITLE Assist. Admin. Analyst DATE 3-27-81

APPROVED BY \_\_\_\_\_ TITLE \_\_\_\_\_ DATE APR 1 1981

CONDITIONS OF APPROVAL, IF ANY:

OIL CONSERVATION DIVISION

P. O. BOX 2088  
SANTA FE, NEW MEXICO 87501

WELL COMPLETION OR RECOMPLETION REPORT AND LOG

NO. OF COPIES RECEIVED		
DISTRIBUTION		
SANTA FE		
FILE		
U.S.G.S.		
LAND OFFICE		
OPERATOR		

5a. Indicate Type of Lease  
State  Fee

5. State Oil & Gas Lease No.

1. TYPE OF WELL  
OIL WELL  GAS WELL  DRY  OTHER \_\_\_\_\_

b. TYPE OF COMPLETION  
NEW WELL  WORK OVER  DEEPEN  PLUG BACK  DIFF. RESVR.  OTHER \_\_\_\_\_

7. Unit Agreement Name  
South Hobbs (GSA) Uni

8. Farm or Lease Name  
South Hobbs (GSA) Uni

2. Name of Operator  
Amoco Production Company

9. Well No.  
121

3. Address of Operator  
P. O. Box 68 Hobbs, NM 88240

10. Field and Pool, or Wildcat  
Hobbs GSA

4. Location of Well  
UNIT LETTER E LOCATED 1450 FEET FROM THE North LINE AND 150 FEET FROM

12. County  
Lea

THE West LINE OF SEC. 4 TWP. 19-S RGE. 38-E NMPM

15. Date Spudded 11-11-78 16. Date T.D. Reached 12-19-78 17. Date Compl. (Ready to Prod.) 7-20-78 18. Elevations (DF, RKB, RT, GK, etc.) 3613.9 GI 19. Elev. Casinghead

20. Total Depth. 4265' 21. Plug Back T.D. 22. If Multiple Compl., How Many 23. Intervals Drilled By: Rotary Tools 0-TD Cable Tools

24. Producing Interval(s), of this completion - Top, Bottom, Name  
Open Hole

25. Was Directional Survey Made  
No

26. Type Electric and Other Logs Run  
Comp form neutron density; Dual laterolog, Micro SFL

27. Was Well Cored  
Yes

28. CASING RECORD (Report all strings set in well)

CASING SIZE	WEIGHT LB./FT.	DEPTH SET	HOLE SIZE	CEMENTING RECORD	AMOUNT PULLED
11-3/4"	42#	1430'	15"	850 SX Class C	Circ. 150
8-5/8"	24#	3853'	11"	1350 SX Class C	Circ. 100

29. LINER RECORD

SIZE	TOP	BOTTOM	SACKS CEMENT	SCREEN	SIZE	DEPTH SET	PACKER SET
					2-7/8"	4258'	

30. TUBING RECORD

31. Perforation Record (Interval, size and number)  
Open hole

32. ACID, SHOT, FRACTURE, CEMENT SQUEEZE, ETC.

DEPTH INTERVAL	AMOUNT AND KIND MATERIAL USED

33. PRODUCTION

Date First Production 7-20-80 Production Method (*Flowing, gas lift, pumping - Size and type pump*) Pumping Well Status (*Prod. or Shut-in*) Producing

Date of Test <u>7-20-80</u>	Hours Tested <u>24 hr.</u>	Choke Size	Prod'n. For Test Period <u>→</u>	Oil - Bbl. <u>49</u>	Gas - MCF <u>420</u>	Water - Bbl. <u>2934</u>	Gas-Oil Ratio
Flow Tubing Press.	Casing Pressure	Calculated 24-Hour Rate <u>→</u>	Oil - Bbl. <u>49</u>	Gas - MCF <u>420</u>	Water - Bbl. <u>2934</u>	Oil Gravity - API (Corr.)	

34. Disposition of Gas (*Sold, used for fuel, vented, etc.*) To be sold Test Witnessed By

35. List of Attachments  
Logs mailed 3-29-79

36. I hereby certify that the information shown on both sides of this form is true and complete to the best of my knowledge and belief.

SIGNED Bob Davis TITLE Admin. Analyst DATE 8-15-80

INSTRUCTIONS

This form is to be filed with the appropriate District Office of the Division not later than 20 days after the completion of any newly-drilled or deepened well. It shall be accompanied by one copy of all electrical and radioactivity logs run on the well and a summary of all special tests conducted, including drill stem tests. All depths reported shall be measured depths. In the case of directionally drilled wells, true vertical depths shall also be reported. For multiple completions, Items 20 through 24 shall be reported for each zone. The form is to be filed in quintuplicate except on state land, where six copies are required. See Rule 1405.

INDICATE FORMATION TOPS IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE

Southeastern New Mexico

Northwestern New Mexico

- |                           |                        |                             |                         |
|---------------------------|------------------------|-----------------------------|-------------------------|
| T. Anhy _____             | T. Canyon _____        | T. Ojo Alamo _____          | T. Penn. "B" _____      |
| T. Salt _____             | T. Strawn _____        | T. Kirtland-Fruitland _____ | T. Penn. "C" _____      |
| B. Salt _____             | T. Atoka _____         | T. Pictured Cliffs _____    | T. Penn. "D" _____      |
| T. Yates _____            | T. Miss _____          | T. Cliff House _____        | T. Leadville _____      |
| T. 7 Rivers _____         | T. Devonian _____      | T. Menefee _____            | T. Madison _____        |
| T. Queen _____            | T. Silurian _____      | T. Point Lookout _____      | T. Eibert _____         |
| T. Grayburg _____ 3886'   | T. Montoya _____       | T. Mancos _____             | T. McCracken _____      |
| T. San Andres _____ 3996' | T. Simpson _____       | T. Gallup _____             | T. Ignacio Qtzite _____ |
| T. Glorieta _____         | T. McKee _____         | Base Greenhorn _____        | T. Granite _____        |
| T. Paddock _____          | T. Ellenburger _____   | T. Dakota _____             | T. _____                |
| T. Blinbry _____          | T. Gr. Wash _____      | T. Morrison _____           | T. _____                |
| T. Tubb _____             | T. Granite _____       | T. Todilto _____            | T. _____                |
| T. Drinkard _____         | T. Delaware Sand _____ | T. Entrada _____            | T. _____                |
| T. Abo _____              | T. Bone Springs _____  | T. Wingate _____            | T. _____                |
| T. Wolfcamp _____         | T. _____               | T. Chinle _____             | T. _____                |
| T. Penn. _____            | T. _____               | T. Permian _____            | T. _____                |
| T. Cisco (Bough C) _____  | T. _____               | T. Penn. "A" _____          | T. _____                |

OIL OR GAS SANDS OR ZONES

- No. 1, from 4265' to 3853'
- No. 2, from \_\_\_\_\_ to \_\_\_\_\_
- No. 3, from \_\_\_\_\_ to \_\_\_\_\_
- No. 4, from \_\_\_\_\_ to \_\_\_\_\_
- No. 5, from \_\_\_\_\_ to \_\_\_\_\_
- No. 6, from \_\_\_\_\_ to \_\_\_\_\_

IMPORTANT WATER SANDS

Include data on rate of water inflow and elevation to which water rose in hole.

- No. 1, from None to \_\_\_\_\_ feet
- No. 2, from \_\_\_\_\_ to \_\_\_\_\_ feet
- No. 3, from \_\_\_\_\_ to \_\_\_\_\_ feet
- No. 4, from \_\_\_\_\_ to \_\_\_\_\_ feet

FORMATION RECORD (Attach additional sheets if necessary)

From	To	Thickness in Feet	Formation	From	To	Thickness in Feet	Formation
0	895	895	Red bed				
895	948	53	Surface				
948	1216	268	Anhy. and red bed				
1216	1323	107	Anhy.				
1323	1431	108	Surface				
1431	1468	37	Anhy.				
1468	2826	1358	Anhy. and salt				
2826	2964	138	Anhy.				
2964	3574	610	Anhy. and lime				
3574	4265	691	Lime				

RECEIVED

AUG 18 1980

POLLUTION PREVENTION TEAM

Worksheet #1

Completed by: HAROLD OGLE

Title: SAFETY DIRECTOR

Date: 3-23-93

MEMBER ROSTER

Leader: HAROLD OGLE

Title: SAFETY DIRECTOR

Office Phone: (505) 393-1491

Responsibilities:

DEVELOP PLAN, IMPLEMENT PLAN, EMPLOYEE TRAINING, RECORDKEEPING AND REPORTING & SIGNATORY AUTHORITY

Members:

(1) FRANK SCHELLER

Title: YARD MANAGER. HOOPS

Office Phone: (505) 393-1491

Responsibilities:

NOTE ANY CHANGES IN RUNOFF PATTERNS & YARD SURFACE. HELP WITH INSPECTIONS

(2) \_\_\_\_\_

Title: \_\_\_\_\_

Office Phone: \_\_\_\_\_

Responsibilities:

(3) \_\_\_\_\_

Title: \_\_\_\_\_

Office Phone: \_\_\_\_\_

Responsibilities:

(4) \_\_\_\_\_

Title: \_\_\_\_\_

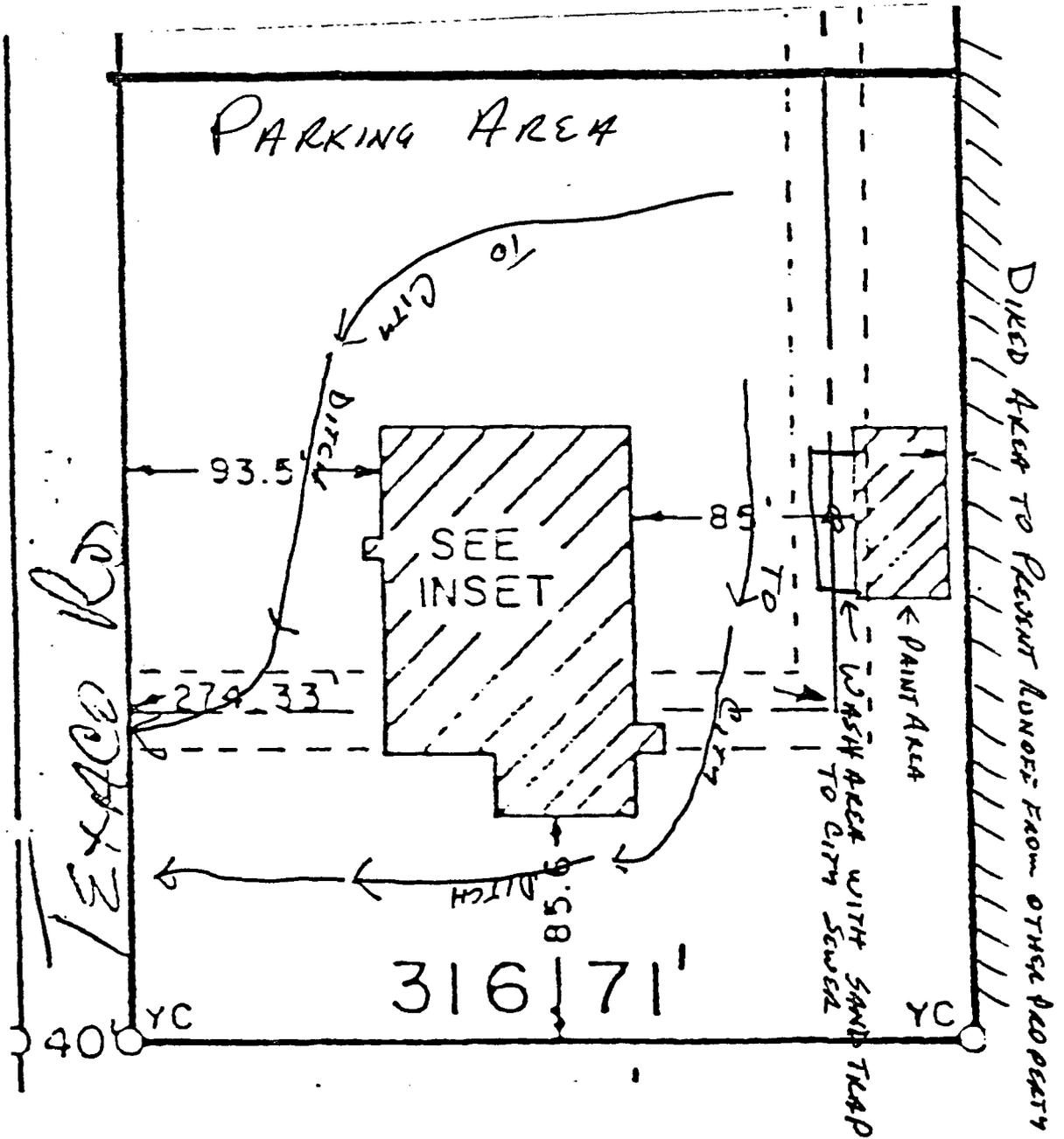
Office Phone: \_\_\_\_\_

Responsibilities:









PARKING AREA

EXACO Rd

SEE INSET

PAINT AREA  
 WASH AREA WITH SAND TRAP

DIKE AREA TO PREVENT RUNOFF FROM OTHER PROPERTY

93.5

279.33

316 | 71

85.8

8

10

40

YC

YC

DITCH

DITCH

DITCH

TO

TO CITY SEWER



**UNICHEM  
INTERNATIONAL**

# MATERIAL SAFETY DATA SHEET

"Essentially Similar" to Form OSHA-20

Date Prepared June 20, 1986

Supersedes Previous Sheet Dated 8-25-83

## 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-HIB 5324**

TRADE NAME: **Corrosion Inhibitor**

CHEMICAL DESCRIPTION: **Proprietary imidazaoline salt in aromatic solvent.**

## II HAZARDOUS INGREDIENTS

MATERIAL	TLV (UNITS)
Contains Aromatic Solvent	8 hr. TWA 100 ppm recommended

## III PHYSICAL DATA

BILING POINT, 760 mm Hg	N/D	FREEZING POINT:	-40°F
SPECIFIC GRAVITY (H <sub>2</sub> O=1)	.90	VAPOR PRESSURE @	N/D
VAPOR DENSITY (AIR=1)	N/D	SOLUBILITY IN WATER	Dispersable
PERCENT VOLATILES BY WEIGHT	N/D	EVAPORATION RATE	N/D

APPEARANCE AND ODOR **Dark amber, aromatic odor**

## IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (TEST METHOD) **76° F (TCC)**

FLAMMABLE LIMITS IN AIR, % BY VOLUME	LOWER	N/D	UPPER	N/D
EXTINGUISHING MEDIA	Foam, dry chemical, CO <sub>2</sub> , 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 100ppm 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. 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		
	XXXXXX		
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 on 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 100-2000ppm. Use self-contained breathing apparatus for higher or unknown vapor concentrations.			
VENTILATION	LOCAL EXHAUST	As needed 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	



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

**TCLP ANALYSIS REPORT**

Company: Cobra Industries  
 Address: P.O. Box 2040  
 City, State: Hobbs, NM 88240  
 Project Name: not given  
 Location: 720 Texaco Rd, Hobbs, NM  
 Sampled by: HO  
 Sample Type: Sludge  
 Sample ID: Sand Trap

Date: 3/29/95  
 Lab #: H1991

Date: 3/16/95  
 Sample Condition: Intact

**TCLP ORGANICS**

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Pyridine	<0.002	5.00	ppm
o-Cresol	26.700	200	ppm
m,p-Cresol	31.200	200	ppm
Hexachloroethane	<0.002	3.00	ppm
Nitrobenzene	<0.002	2.00	ppm
Hexachloro-1,3-butadiene	<0.002	0.500	ppm
2,4,6-Trichlorophenol	<0.002	2.00	ppm
2,4,5-Trichlorophenol	<0.002	400	ppm
2,4-Dinitrotoluene	<0.002	0.130	ppm
Hexachlorobenzene	<0.002	0.130	ppm
Pentachlorophenol	<0.002	100	ppm
Vinyl chloride	<0.001	0.20	ppm
1,1-Dichloroethylene	<0.001	0.70	ppm
Methyl ethyl ketone	<0.001	200	ppm
Chloroform	<0.001	6.00	ppm
1,2-Dichloroethane	<0.001	0.50	ppm
Benzene	0.406	0.50	ppm
Carbon tetrachloride	<0.001	0.50	ppm
Trichloroethylene	<0.001	0.50	ppm
Tetrachloroethylene	<0.001	0.70	ppm
Chlorobenzene	<0.001	100	ppm
1,4-Dichlorobenzene	<0.001	7.50	ppm

**TCLP INORGANICS (Leachate)**

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Silver	<0.1	5.0	ppm
Arsenic	0.015	5.0	ppm
Barium	0.97	100.0	ppm
Cadmium	<0.1	1.0	ppm
Chromium	<0.1	5.0	ppm
Mercury	<0.001	0.2	ppm
Lead	0.21	5.0	ppm
Selenium	<0.01	1.0	ppm

**HAZARDOUS WASTE CHARACTERIZATION**

<u>PARAMETER</u>	<u>RESULT</u>	<u>EPA LIMIT</u>	<u>UNITS</u>
Ignitability (Pensky-Martens Closed Cup)	88	140	F
Corrosivity, (pH)	8.09	<2.0 or >12.5	
Reactivity (H <sub>2</sub> S)	2.3		H <sub>2</sub> S/kg
Reactivity (HCN)	<0.03		HCN/kg
METHODS: TCLP ORGANICS - EPA 8260/8270			
METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000			
METHODS: HWC - EPA SW 845			

Michael R. Fowler

Date: 3/20/95



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
525 Camino De Los Marquez  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-4358  
Fax (505) 827-4389

MARK E. WEIDLER  
SECRETARY  
EDGAR T. THORNTON, III  
DEPUTY SECRETARY

May 23, 1995

Walter Biggins, Grants Section Chief  
RCRA Programs Branch (6H-HS)  
U.S. Environmental Protection Agency  
1445 Ross Ave., Suite 1200  
Dallas, Texas 75202-2733

Dear Mr. Biggins:

This letter is in response to your verbal request during our meeting in Santa Fe on May 17, 1995 concerning the grant workplan mid-year review. Specifically, you requested a list of the facilities in New Mexico recently inspected by the Region VI Hazardous Waste Division. Enclosed is a list of the facilities that Region VI and contractor staff inspected or had planned to inspect. We have not received any copies of inspection reports or letters from Region VI as a result of the inspections.

Members of my staff accompanied Region VI staff on some of the inspections and are available to answer any questions you may have concerning them. Mr. Roger Anderson of the New Mexico Oil Conservation Division brought some matters of concern to Benito Garcia concerning the Region VI inspection team. Should you have any questions you wish to direct to Mr. Anderson directly, he can be reached at (505) 827-7152. Please feel free to contact me concerning this or any other matter at (505) 827-4308.

Sincerely,

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

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

Enclosure

xc: Benito Garcia, Chief, HRMB  
John Tymkowych, RCRA Inspection Group Supervisor, HRMB  
✓ Roger Anderson, Oil Conservation Division

Xc: cobra file (Hobbs)

176- R06032	FACILITY/LOCATION	EPA SITE ID NO.	INSPECTION DATE	PRC CEM INSPECTION TEAM	SAMPLES COLLECTED	REPORT AUTHOR	REPORT DUE DATE	DATE DELIVERED
01	Multi-site							
<b>Farmington, NM</b>								
02	Enertek (no report due)	-	4/3	Ayers, Butler, Vega, Hess	-	-	None	-
03	Unichem International	NMD102790128	4/3	Ayers, Butler, Vega, Hess	No	Czechowaki	5/3	
04	Weakem-Hall Inc.	NMD097971626	4/3	Ayers, Butler, Vega, Hess	No	Czechowaki	5/3	
05	CDI Chemical Distributors	-	4/4, 4/5	Ayers, Butler, Vega, Hess	yes		6/2	
06	Coastal Chemical Co., Inc.	NMD130100155	4/5	Butler, Hess	No	Senkayi	5/5	
<b>Artec, NM</b>								
16	Triple S, Totah Rental, Aztec Drilling	-	4/6	Butler, Hess, Ayers, Vega	Yes		6/5	
<b>Albuquerque, NM</b>								
07	National Research Laboratories	NMD130100155	4/17	Ayers, Butler, Vega, Hess	Yes		6/16	
08	Van Waters & Rogers, Inc.	NMD076467364	4/11	Butler, Collins, Ayers, Vega	No		5/11	
09	Layton Drum Co.	NMD980868608	4/10	Butler, Hess, Ayers, Vega	Yes		6/9	
10	Fleming Chemical Company	-	4/11	Butler	No		5/11	
11	Organic Plus	-	4/13	Butler	No		5/12	
17	Solv-Ex	NMD986683597	4/12, 4/13	Butler, Collins, Ayers, Vega	Yes		6/12	
<b>Artesia, NM</b>								
12	SES - NMED	-	4/18	Ayers, Butler, Vega, Hess	Yes		6/16	
<b>Carlsbad, NM</b>								
18	IMC Fertilizer	NMD035718634	4/19	Butler, Hess, Ayers, Vega	No		5/19	
<b>Hobbs, NM</b>								
13	Enviro-Chem	-	4/25	Ayers, Butler, Vega, Collins	Yes		6/23	
14	B J Western	NMD052377637	4/24, 4/25	Butler, Ayers, Collins, Vega	Yes		6/23	
15	Cobra Oil Industries Co.	-	4/26	Ayers, Butler, Collins, Vega	Yes		6/5	

\* Possible RCRA problems per Greg Pashta w/ EPA Region 8. (7/6/95)

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ENVIRONMENTAL DIVISION  
RECEIVED  
MAR 10 1995

STATE OF NEW MEXICO  
NMOCD District I

INTER-OFFICE MEMO

To file: Cobra Industries, Inc.  
720 Texaco Road  
Hobbs, NM  
Tele.# 505-393-1491

Date: March 8, 1995  
Time: 4:00 pm  
Telephone call: \_\_\_\_\_ Meeting: X Other: X site visit

Person called or attending:

Wayne Price, Pat Sanchez, Chris Eustice- NMOCD  
Harold Ogle- Safety and Environmental-Cobra  
Chuck Landrum-Cobra

REFERENCE: Discharge Plan review and on site inspection

Subject: Inspection report (sketch attached.)

Comments:

Cobra Industries is an oil field service company that provides oil well servicing equipment (pulling units) for well work overs and they also build oil field tanks and perform maintenance and pressure test on various kinds of non-oil field and oil field alike tanks, trailers, etc.

The following tanks, sumps, fuels and products are on site.

1. Two large horizontal diesel tanks, partially buried. There is no containment under these tanks. A buried line goes to a set of pumps nearby.
2. One small horizontal mounted methanol tank.
3. One large vertical water storage tank for testing. This water is re-used after each test, therefore can have residual chemicals retained in it. Tank is not bermed.
4. Used oil tank, mounted on a concrete apron.

5. Wash bay sump/trough system, connected to city sewer system (drawing attached); concrete construction, no leak detection, problem with overflow system, could possibly release oil into city sewer system.

The following waste streams were Identified:

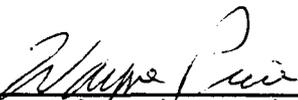
1. Red Rag service (recycle).
2. The main wash bay sump which is used for washing off trucks, equipment, tank testing, etc. generates the three waste streams.
  - A. Water which goes to the city of Hobbs sewer system.
  - B. Miscellaneous hydrocarbons that builds up in sump. This material is transferred over to the Used Oil tank on site. This material is shipped off-site by E&E, manifest attached.
  - C. Sludge that builds up in the bottom of the sump. This waste is transported off site by Lea County Septic Tank Srv. and carried to its facility which is permitted under the NMED DP# 884 (attached).
3. Parts washer and solvents. (recycled and make-up only).
4. Solid waste trash dumpster on site. Waste Management, waste goes to local landfill.
5. Used motor oils, hydraulic oils, solvents, greases, etc, goes to used oil tank.
6. Antifreeze, disposal not determined at this time.
7. Used oil filters, drained; disposal not determined at this time.
8. Used batteries, normally goes back to battery supplier.

Recommendations for Cobra at closing meeting:

1. Identify all waste streams and include in plan.
2. Sample and analyze sump sludge to ensure that it is non-hazardous. Use EPA methods. Recommend to check with NMED to determine if this waste stream is approved to go the facility listed as NMED DP# 884.

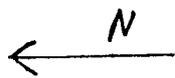
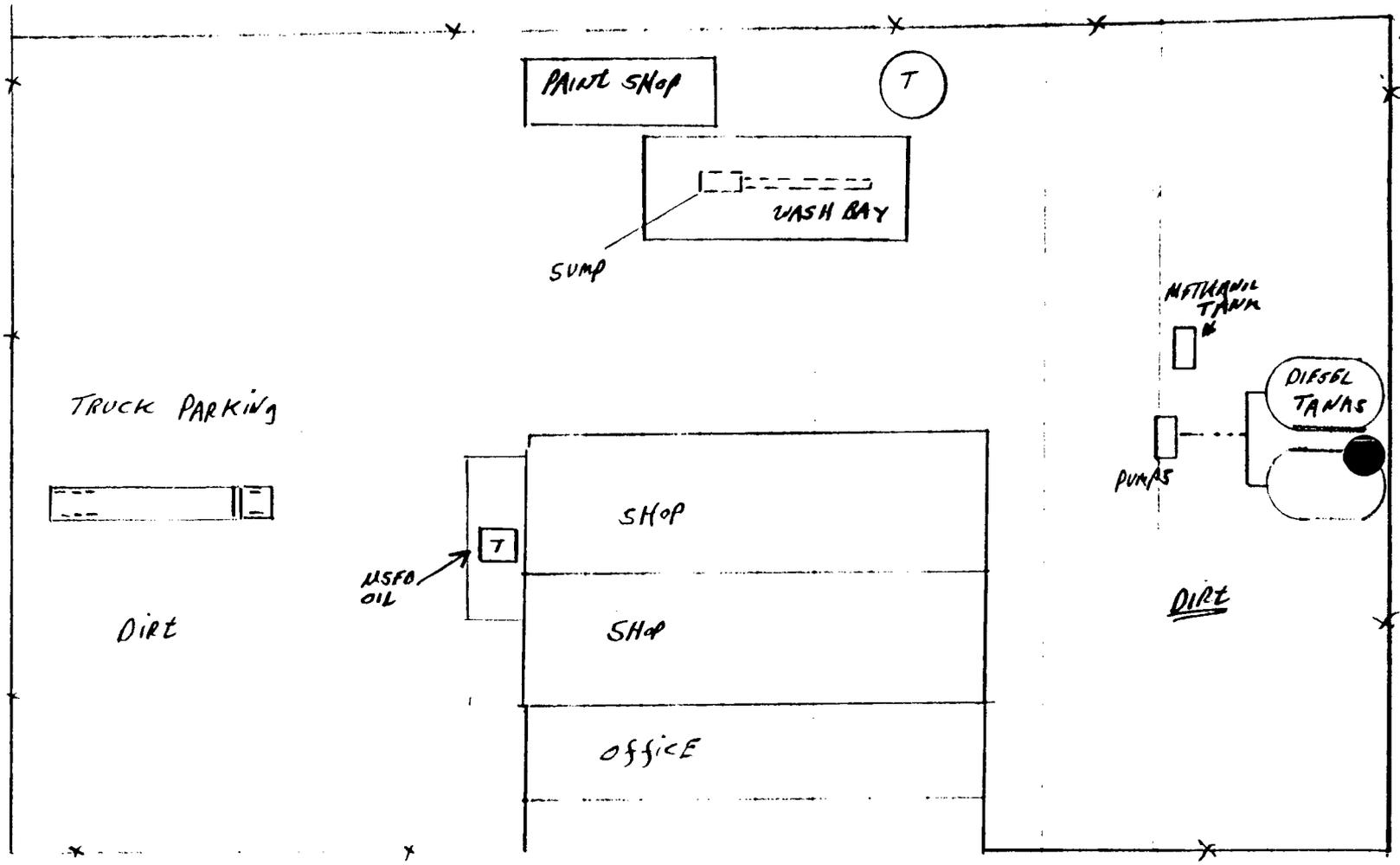
Recommendations cont'.

3. Check with the Used Oil Recycler to see if it is ok for them to accept the used oil waste stream, since other waste are commingle with it. If not, then segregate the waste streams and sample these to determine if they are hazardous.
4. Include their stormwater information in the NMOCD plan.
5. Address the housekeeping and oil stains in the yard.
6. Prepare for contingencies in the future to pad, curb, and berm ares where chemicals, fuels, and test waters will be stored.
7. Develop an on site operating plan to prevent hydrocarbons and/or any other deleterious chemicals or pollutants from entering the city sewer system; or install additional engineering controls to accomplish this task.
8. Submit discharge plan application to the NMOCD Santa Fe Environmental Bureau per guidelines.

Wayne Price   
NMOCD Environmental Engineer-District I

CC: Pat Sanchez-~~Environmental~~ Petroleum Engineer  
Chris Eustice-Environmental Geologist  
Jerry Sexton-District I Supervisor  
Harold Ogle-Safety Director  
David Hooten-Director EM&S City of Hobbs, NM

attachments-4



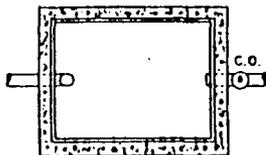
COBRA INDUSTRIES  
720 TEXACO RD  
HOOBS N.M.

3/8 /95

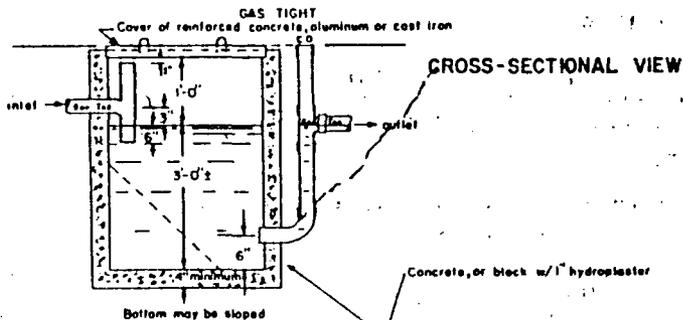
SKETCH ONLY  
 NO SCALE

**A. TYPICAL GREASE INTERCEPTOR**

Dimensions: on application to  
Plumbing Administrative Board  
Office  
Minimum piping size: 2"

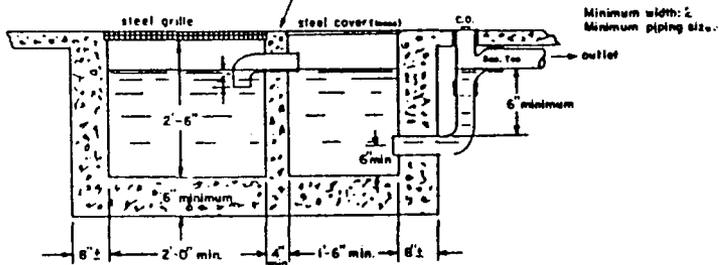


**TOP PLAN**



**CROSS-SECTIONAL VIEW**

**B. TYPICAL SAND AND GREASE INTERCEPTOR FOR AUTO-WASH**



**RECOMMENDED DESIGN**

*4' x 5' x 5' = 750 gallon capacity - (minimum)*

PLUMBING  
OFFICE

**E P A MANIFEST RECORD  
NON-HAZARDOUS  
WASTE MANIFEST**

CUSTOMER INVOICE  
NO. 27057

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087

**E & E ENTERPRISES**  
P.O. Box 683  
Brownfield, TX 79316

Please print or type.

<b>GENERATOR'S MAILING ADDRESS</b>	<b>PICK-UP LOCATION</b>	<b>ACCOUNT</b>
<i>Cobra Industries</i>	<i>720 S. Terminal St.</i>	NO: _____
<i>720 S. Terminal St.</i>	<i>Wobbs, NM</i>	P.O. NO. _____
<b>GENERATOR'S PHONE NO.</b> <i>(505) 893-491</i>		<b>EPA ID NO.</b> _____

**DESCRIPTION OF NON-HAZARDOUS WASTE:**

Type of Waste (Include US DOT Shipping Name, Hazard Class, and ID Number, if applicable)	QUANTITY	Type QTY*	Unit Cost	Total Cost
NON-HAZARDOUS USED OIL	<i>750</i>	<i>G</i>	<i>112</i>	
NON-HAZARDOUS USED OIL FILTERS				
USED ANTI-FREEZE				

\*G=Gallons; P=Pounds; T=Tons; D=Drums **TOTAL CHARGE** *RECEIVED*  
Additional Descriptions of Materials, if necessary

**Special Handling Instructions and Additional Information**

**GENERATOR CERTIFICATION:** I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.

Print Name of Generator <i>Charles A. Landrum</i>	Signature of Generator <i>Charles A. Landrum</i>	MO. <i>11</i>	DAY <i>10</i>	YR. <i>91</i>
--	---	------------------	------------------	------------------

**DESIGNATED FACILITY: TRANSPORTER, STORER AND TREATOR OF MATERIALS**

<b>E &amp; E ENTERPRISES</b>	Phone: (806) 637 9336	US EPA ID NO TXD 982 75 6868
P.O. Box 683	1-800-658-2137	TWC Permit NO 41398
Brownfield, TX 79316	(TWC: (512) 463 7727)	TX RR NO 000013747C

**Transporter Acknowledgement of Receipt of Materials**

Print Name of Hauler <i>Robert Gonzalez</i>	Signature of Hauler <i>Robert Gonzalez</i>	MO. <i>11</i>	DAY <i>10</i>	YR. <i>91</i>
--	---	------------------	------------------	------------------

Discrepancy Space

**Facility Certification of Receipt of Materials Covered by this Manifest (except as noted above)**

Print Name of Facility Operator	Signature of Facility Operator	MO.	DAY	YR.
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GROUND WATER SECTION  
Groundwater Bureau  
Environment Department  
Santa Fe, N.M. 87503  
(505) 827-2900

SUMMARY OF DISCHARGE PLAN

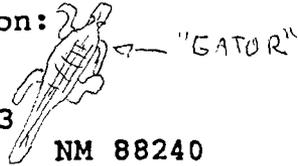
August 09, 1993

DP number: 884 Facility Name: LEA COUNTY SEPTIC TANK SRV.  
Facility Desc: INDUSTRIAL  
Waste Type: INDUSTRIAL  
Discharge / Treatment: EVAPORATION LAGOON / HYDROCARBON  
REMEDICATION

County: LEA ED District: 4 20S 38E Sec. 14.000

Location: SOUTHEAST OF HOBBS Nearest City: HOBBS

Responsible Person: E. E. TAYLOR Contact or Consultant Person  
Title: OWNER  
Address: P. O. BOX 703  
City, zip: HOBBS NM 88240  
Phone: 397-2382



The Ground Water Section staff reviewer is CHRIS WHITMAN .  
Application was received 14-MAY-92 and Public Notice published 21-SEP-92 .  
The plan was approved 09-AUG-93 and expires 09-AUG-98 .  
(Application for renewal should be submitted in ample time before expiration.)

MONITORING REQUIREMENTS SUMMARY

No. of monitoring reports required annually: 2  
Monitoring reports are due no later than: 01-FEB and 01-AUG of each year.

<u>Sampling required</u>	<u>Annual freq.</u>	<u>No of sites</u>	<u>Comments, description</u>
Disch. Vols	2	1	VOLUME DISCHARGED TO EACH POND, SEMI-ANNUALLY.
Organics	1	1	SAMPLES TESTED FOR PURGEABLE ORGANICS BY EPA METHOD 8110 AND 8020 YEARLY FOR EACH POND IN USE.
Manifest	2	1	MANIFEST, SEMI-ANNUALLY. EACH TRUCKLOAD SHALL HAVE RECORDED: date of delivery, name of discharging facility(ies), amount and type of waste discharged, pond receiving discharge- -Recorded as delivered, reported 2X/yr.

If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet. Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.

Send monitoring reports to the address at top, "Attention: CHRIS WHITMAN

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



February 7, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-765-962-639**

Mr. Mike McDermitt  
COBRA INDUSTRIES OIL WELL SERVICING, INC.  
P.O. Box 2040  
Hobbs, NM 88241

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

Dear Mr. McDermitt:

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 COBRA INDUSTRIES OIL WELL SERVICING facility located at 720 TEXACO ROAD Hobbs, New Mexico.

The discharge plan is required pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.Q 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. Mike McDermitt  
February 7, 1995  
Page 2

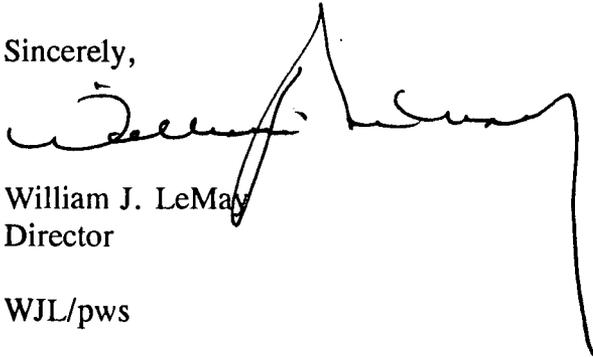
A copy of the regulations have been provided for your convenience. Also provided is an OCD guideline for the preparation of discharge plans at oil & gas service companies. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition 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 Patricio Sanchez at 827-7156 or Roger Anderson at 827-7152.

Sincerely,



William J. LeMay  
Director

WJL/pws

XC: OCD Hobbs Office

Z 765 962 639



Receipt for  
Certified Mail

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

Sent to		COBRA W.S.
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





*Material Safety Data Sheet*

**SAFETY-KLEEN 105 SOLVENT  
RECYCLED**

*Part Number: 6617, 1011662, 1014662*

Dear Safety-Kleen Customer,

At Safety-Kleen Corp., supplying material safety data sheets is more than a requirement to us; it is a commitment to our customers and their employees.

The material safety data sheet is a valuable source of product information and should be a part of your hazard communication program. With this in mind, we are providing you, our valued customer, this important product information.

Thank you for showing your concern for the environment by choosing Safety-Kleen Corp. products and services.

Sincerely,

Your friends at Safety-Kleen Corp.





# SAFETY-KLEEN 105 SOLVENT RECYCLED

## MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

NAME	SYNONYM	CAS NO.	WT%	OSHA PEL		ACGIH TLV		OTHER DATA	
				TWA ppm	STEL ppm	TWA ppm	STEL ppm	LD <sup>a</sup>	LC <sup>b</sup>
*1,1,1-Trichloroethane	Methyl chloroform	71-55-6	0-0.5**	350	450	350	450	10300	18000 ppm/4 hours

N.Av. = Not Available

\*See Section 9-SARA Title III

\*\*Even though the concentration range does not fall under the ranges prescribed by WHMIS, this is the actual range which varies with each batch of the product.

<sup>a</sup>Oral-Rat LD50 (mg/kg)

<sup>b</sup>Inhalation-Rat LC50

<sup>c</sup>For Stoddard Solvent CAS 8052-41-3

<sup>d</sup>Reference source 1910.1000 29 CFR Ch. XVII (7-1-92 edition): 100 ppm TWA

<sup>e</sup>Reference source 1910.1000 29 CFR Ch. XVII (7-1-92 edition): 25 ppm TWA

<sup>f</sup>For Stoddard Solvent: 29500 mg/m<sup>3</sup> (approximately 5000 ppm) IDLH

<sup>g</sup>For Petroleum Distillates: 10000 ppm IDLH

### SECTION 3 -- EMERGENCY AND FIRST AID PROCEDURES

- EYES:** For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. If irritation or redness from exposure to vapor or mist develops, move victim away from exposure into fresh air. Consult physician if irritation or pain persists.
- SKIN:** Remove contaminated clothing and shoes. Wash skin twice with soap and water. Consult physician if irritation or pain persists.
- INHALATION: (Breathing)** Remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if breathing has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.
- INGESTION: (Swallowing)** Seek immediate medical attention. Do NOT induce vomiting. If spontaneous vomiting occurs, keep head below hips to avoid aspiration (breathing) into the lungs.
- SPECIAL NOTE TO PHYSICIAN:** Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Contact Rush Poison Control center (see Section 1) for additional medical information.

### SECTION 4 -- HEALTH HAZARD DATA AND TOXICOLOGICAL PROPERTIES

**PRIMARY ROUTES OF EXPOSURE:** Eye and skin contact; inhalation, ingestion.

**EXPOSURE LIMITS:** See Section 2.

**SIGNS AND SYMPTOMS OF EXPOSURE**

**ACUTE: Eyes:** Contact with liquid or exposure to vapors may cause mild to moderate irritation with watering, stinging, or redness.

**Skin:** Contact with liquid or exposure to vapors may cause mild to severe irritation. Contact with liquid or exposure to vapors may cause redness, dryness, cracking, burning, or dermatitis. No significant skin absorption hazard.

**Inhalation (Breathing):** High concentrations of vapor or mist may irritate the nose, throat, or respiratory tract. High concentrations of vapor or mist may cause nausea, vomiting, or irregular heartbeat. High concentrations of vapor or mist may cause headaches, dizziness, incoordination, numbness, unconsciousness, and other central nervous system effects. Massive acute exposure may result in rapid central nervous system depression with sudden collapse, deep coma, and death.

**Ingestion (Swallowing):** Low order of acute oral toxicity. May cause throat irritation, nausea, vomiting, myocardial (muscular tissue of the heart) injury, arrhythmias (irregular heartbeats), and symptoms of central nervous system effects as listed for ACUTE Inhalation. Breathing material into the lungs during ingestion or vomiting may cause mild to severe pulmonary (lung) injury and possibly death.

**SAFETY-KLEEN 105 SOLVENT RECYCLED**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**CHRONIC:** Prolonged or repeated eye contact may cause conjunctivitis. Prolonged or repeated skin contact may cause drying, cracking, dermatitis, or burns.

**MEDICAL CONDITIONS  
AGGRAVATED BY  
EXPOSURE:**

Individuals with pre-existing lung, cardiac, central nervous system, or skin disorders may have increased susceptibility to the effects of exposure.

**CARCINOGENICITY:**

IARC classifies chemicals by their carcinogenic risk, including agents that are known, probable, or possible carcinogens. NTP classifies chemicals as either known carcinogens, or for which there is a limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals. ACGIH recognizes several categories of carcinogens, including confirmed human carcinogens, suspected human carcinogens, and animal carcinogens.

Tetrachloroethene is listed by IARC as a possible carcinogen. Tetrachloroethene is classified by NTP as having limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals. Tetrachloroethene is recognized by ACGIH as an animal carcinogen.

**OTHER POTENTIAL  
HEALTH HAZARDS:**

The following information is required by Canadian WHMIS regulations. Irritancy is covered in Signs and Symptoms of Exposure in Section 4. There is no known human sensitization, toxicologically synergistic product, reproductive toxicity, or mutagenicity associated with this product as a whole. Studies indicate that 1,1,1-trichloroethane is an experimental teratogen.

**SECTION 5 -- FIRE AND EXPLOSION HAZARD DATA**

**EMERGENCY RESPONSE  
GUIDE NUMBER:**

27  
Reference 1993 *Emergency Response Guidebook* (RSPA P 5800.6)

**FIRE AND  
EXPLOSION HAZARDS:**

Decomposition and combustion products may be toxic. Heated containers may rupture, explode, or be thrown into the air. Vapors are heavier than air and may travel great distances to ignition source and flash back. Vapor explosion hazard indoors, outdoors, or in sewers. Run-off to sewer may create fire or explosion hazard. Not sensitive to mechanical impact. Material may be sensitive to static discharge, which could result in fire or explosion.

**FIRE FIGHTING PROCEDURES:**

Keep storage containers cool with water spray. Positive-pressure, self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

**EXTINGUISHING MEDIA:**

Carbon dioxide, foam, dry chemical, or water spray.

**CONDITIONS OF FLAMMABILITY:**

Heat, sparks, or flame.

**FLASH POINT:**

105°F (40°C) (minimum) Tag Closed Cup

**AUTOIGNITION TEMPERATURE:**

440°F (227°C) (minimum) (based on similar materials)

**FLAMMABLE LIMITS IN AIR:**

**LOWER:** 1.0 Vol. % (based on similar materials)  
**UPPER:** 9.3 Vol. % (based on similar materials)

**HAZARDOUS COMBUSTION  
PRODUCTS:**

Burning may produce phosgene, chloroacetylenes, chlorides, or carbon monoxide.

**SECTION 6 -- REACTIVITY DATA**

**STABILITY:**

Stable under normal temperatures and pressures, and not reactive with water.

**INCOMPATIBILITY (MATERIALS AND  
CONDITIONS TO AVOID):**

Avoid strong acids, bases, or oxidizing agents. Chlorine may cause a violent reaction. Avoid heat, sparks, or flame.

**SAFETY-KLEEN 105 SOLVENT RECYCLED**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**HAZARDOUS POLYMERIZATION:** Not known to occur under normal temperatures and pressures.

**HAZARDOUS DECOMPOSITION PRODUCTS:** None under normal temperatures and pressures.

**SECTION 7 -- PREVENTIVE MEASURES**

**PRECAUTIONS FOR SAFE USE AND HANDLING**

**HANDLING PRECAUTIONS:** Keep away from heat, sparks, or flame. Where explosive mixtures may be present, equipment safe for such locations should be used. When transferring material, metal containers, including tank cars and trucks, should be grounded and bonded. Avoid contact with eyes, skin, clothing, or shoes. Use in well ventilated area and avoid breathing vapor or mist.

**PERSONAL HYGIENE:** Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco products. Clean contaminated clothing, shoes, and protective equipment before reuse. Discard contaminated clothing, shoes, or protective equipment if they cannot be thoroughly cleaned.

**SHIPPING AND STORING PRECAUTIONS:** Keep container tightly closed when not in use and during transport. Do not pressurize, drill, cut, heat, weld, braze, grind, or expose containers to flame or other sources of ignition. Empty product containers may contain product residue. See Section 9 for Packing Group information.

**SPILL PROCEDURES:** Remove all ignition sources. Stop leak if you can do it without risk. Wear protective equipment specified in Section 7, CONTROL MEASURES. Ventilate area and avoid breathing vapor or mist. Water spray may reduce vapor, but it may not prevent ignition in closed spaces. For large spills, isolate area and deny entry; dike far ahead of liquid spill for later disposal. Contain away from surface waters and sewers. If possible, contain as a liquid for possible re-refining or sorb with compatible sorbent material and shovel with a non-sparking tool into closable container for disposal. See 1993 *Emergency Response Guidebook* (RSPA P 5800.6) Guide Number 27 for more information.

**WASTE DISPOSAL METHODS:** Dispose in accordance with federal, state, provincial, and local regulations. Contact Safety-Kleen regarding recycling or proper disposal.

**CONTROL MEASURES**

**EYE PROTECTION:** Where there is likelihood of eye contact, wear chemical goggles; do NOT wear contact lenses.

**PROTECTIVE GLOVES:** Use Nitrile, Viton<sup>®</sup>, or equivalent gloves to prevent contact with skin. Use of Butyl rubber, natural rubber, or equivalent gloves is not recommended.

**RESPIRATORY PROTECTION:** Use NIOSH/MSHA-approved respiratory protective equipment when concentration of vapor or mist exceeds applicable exposure limit. A self-contained breathing apparatus (SCBA) and full protective equipment are required for large spills or fire emergencies. Selection and use of respiratory protective equipment should be in accordance in the U.S.A. with OSHA General Industry Standard 29 CFR 1910.134 or in Canada with CSA Standard Z94.4-M1982.

**ENGINEERING CONTROLS:** Provide process enclosure or local ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

**OTHER PROTECTIVE EQUIPMENT:** Where spills and splashes are possible, wear appropriate solvent-resistant boots, apron, or other protective clothing. Clean water should be available in work areas for flushing the eyes and skin.

**SECTION 8 -- PHYSICAL DATA**

**PHYSICAL STATE, APPEARANCE AND ODOR:** Liquid, clear, green, with characteristic hydrocarbon odor.

**SAFETY-KLEEN 105 SOLVENT RECYCLED**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**ODOR THRESHOLD:** 30 ppm (based on Stoddard Solvent)

**SPECIFIC GRAVITY:** 0.77 to 0.80 (60°/60°F) (16°/16°C) (water = 1)

**DENSITY:** 6.4 to 6.7 lb/US gal (770 to 800 g/l)

**VAPOR DENSITY:** 5.3 to 6.2 (air = 1) (based on similar materials)

**VAPOR PRESSURE:** 1 to 2 mm Hg at 68°F (20°C)

**BOILING POINT:** 310° to 400°F (155° to 205°C)

**FREEZING POINT:** less than -45°F (-43°C) (based on similar materials)

**pH:** Not applicable.

**VOLATILE ORGANIC COMPOUNDS:  
(US EPA DEFINITION)** 100 WT%; 6.4 to 6.7 lb/US gal; 770 to 800 g/l

**EVAPORATION RATE:** less than 0.1 (butyl acetate = 1) (based on similar materials)

**SOLUBILITY IN WATER:** Insoluble. (based on similar materials)

**COEFFICIENT OF WATER/OIL  
DISTRIBUTION:** less than 1 (based on similar materials)

**MOLECULAR WEIGHT:** 155 to 180 (based on similar materials)

**SECTION 9 -- OTHER REGULATORY INFORMATION**

**TRANSPORTATION INFORMATION**

**DOT PROPER SHIPPING NAME:** COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)

**DOT CLASS:** Combustible Liquid

**DOT ID NUMBER:** NA1993 PG III

**TDG CLASSIFICATION:** Naphtha, Petroleum, Class 3.3, UN1255, PG III

**SARA TITLE III:** Product contains toxic chemicals subject to requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. Toxic constituents are listed with an asterisk in Section 2 of this Material Safety Data Sheet.

Product poses the following physical and health hazards as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986:

Immediate (Acute) Health Hazard  
Delayed (Chronic) Health Hazard  
Fire Hazard

**WHMIS CLASSIFICATION:** B3, Flammable and Combustible Material, Combustible Liquids;  
D2A, Poisonous and Infectious Material, Materials Causing Other Toxic Effects,  
Very Toxic Material  
D2B, Poisonous and Infectious Material, Materials Causing Other Toxic Effects,  
Toxic Material

**SAFETY-KLEEN 105 SOLVENT RECYCLED**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

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**TSCA:** All of the components for this product are listed on, or are exempted from the requirement to be listed on, the TSCA Inventory.

**CALIFORNIA:** This product is not for sale or use in the State of California.

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User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet apply to the material as supplied to the user.





*Material Safety Data Sheet*

**SAFETY-KLEEN  
PREMIUM SOLVENT**

*Part Number: 6605*

Dear Safety-Kleen Customer,

At Safety-Kleen Corp., supplying material safety data sheets is more than a requirement to us; it is a commitment to our customers and their employees.

The material safety data sheet is a valuable source of product information and should be a part of your hazard communication program. With this in mind, we are providing you, our valued customer, this important product information.

Thank you for showing your concern for the environment by choosing Safety-Kleen Corp. products and services.

Sincerely,

Your friends at Safety-Kleen Corp.



**SAFETY-KLEEN PREMIUM SOLVENT**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**SECTION 1 -- PRODUCT AND PREPARATION INFORMATION**

**PRODUCT INFORMATION**

**IDENTITY (TRADE NAME):** SAFETY-KLEEN PREMIUM SOLVENT

**SYNONYMS:** Petroleum Distillates; Petroleum Naphtha; Stoddard Solvent; Naphtha, Solvent

**SK PART NUMBER(S):** 6605

**FAMILY/CHEMICAL NAME:** Petroleum hydrocarbon

**PRODUCT USE:** Cleaning and degreasing metal parts.  
 If this product is used in combination with other chemicals, refer to the Material Safety Data Sheets for those chemicals.

<b>24-HOUR EMERGENCY TELEPHONE</b>	<b>MEDICAL:</b>	<b>TRANSPORTATION:</b>
These numbers are for emergency use only. If you desire non-emergency information about this product, please call a telephone number listed below.	1-800-752-7869 (U.S.A.)	1-708-888-4660 (U.S.A.)
	1-312-942-5969 (CANADA)	SAFETY-KLEEN ENVIRONMENT, HEALTH AND SAFETY DEPARTMENT
	RUSH POISON CONTROL CENTER CHICAGO, ILLINOIS, U.S.A.	1-613-996-6666 (CANADA) CANUTEC

**MANUFACTURER/SUPPLIER:** Safety-Kleen Corp. - 1000 North Randall Road - Elgin, IL, U.S.A. 60123  
 Telephone number: 1-800-669-5840  
 Safety-Kleen Canada Inc. - 3090 Blvd. Le Carrefour - Suite 300 - Chomedey Laval  
 Quebec, Canada H7T 2J7 Telephone number: 1-800-363-2260

**PREPARATION INFORMATION**

**MSDS FORM NO.:** 82529 **REVISION DATE:** July 8, 1993

**ORIGINAL ISSUE DATE:** January 7, 1993 **SUPERSEDES:** March 18, 1993

**PREPARED BY:** Product MSDS Coordinator **APPROVED BY:** MSDS Task Force Chairman

**TELEPHONE NUMBER:** For Product Technical Information Call 1-312-694-2700 (U.S.A.);  
 1-800-363-2260 (Canada)

**SECTION 2 -- HAZARDOUS COMPONENTS**

<b>NAME</b>	<b>SYNONYM</b>	<b>CAS NO.</b>	<b>WT%</b>	<b>OSHA PEL<sup>1</sup></b>		<b>ACGIH TLV</b>		<b>OTHER DATA</b>	
				<b>TWA</b>	<b>STEL</b>	<b>TWA</b>	<b>STEL</b>	<b>LD<sup>a</sup></b>	<b>LC<sup>b</sup></b>
Distillates (petroleum) hydrotreated light	Solvent naphtha (petroleum), heavy aliph., hydrotreated	64742-47-8	100	100 <sup>c</sup> ppm	N.Av.	100 <sup>c</sup> ppm	N.Av.	>5000	>5500 <sup>c</sup> mg/m <sup>3</sup> /4 hours

N.Av. = Not Available  
<sup>a</sup>Oral-Rat LD50 (mg/kg)  
<sup>b</sup>Inhalation-Rat LC50

<sup>c</sup>For Stoddard Solvent CAS 8052-41-3  
<sup>1</sup>Reference source: 1910.1000 29 CFR Ch. XVII (7-1-92 edition)

# SAFETY-KLEEN PREMIUM SOLVENT

## MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

### SECTION 3 -- EMERGENCY AND FIRST AID PROCEDURES

- EYES:** For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. If irritation or redness from exposure to vapor or mist develops, move victim away from exposure into fresh air. Consult physician if irritation or pain persists.
- SKIN:** Remove contaminated clothing and shoes. Wash skin twice with soap and water. Consult physician if irritation or pain persists.
- INHALATION:  
(Breathing)** Remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if breathing has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.
- INGESTION:  
(Swallowing)** Seek immediate medical attention. Do NOT induce vomiting. If spontaneous vomiting occurs, keep head below hips to avoid aspiration (breathing) into the lungs.
- SPECIAL  
NOTE TO  
PHYSICIAN:** Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Contact Rush Poison Control Center (see Section 1) for additional medical information.

### SECTION 4 -- HEALTH HAZARD DATA AND TOXICOLOGICAL PROPERTIES

**PRIMARY ROUTES OF EXPOSURE:** Eye and skin contact; inhalation, ingestion.

**EXPOSURE LIMITS:** See Section 2.

#### SIGNS AND SYMPTOMS OF EXPOSURE

**ACUTE:** *Eyes:* Contact with liquid or exposure to vapors may cause mild to moderate irritation with watering, stinging, or redness.

*Skin:* Contact with liquid or exposure to vapors tends to remove skin oils, possibly causing redness, drying and cracking, and burning, leading to dermatitis. No significant skin absorption hazard.

*Inhalation (Breathing):* High concentrations of vapor or mist may irritate the eyes and respiratory tract. High concentrations of vapor or mist may cause nausea, vomiting, difficulty breathing, lung congestion, and heart attack. High concentrations of vapor or mist may cause headaches, dizziness, incoordination, numbness, unconsciousness, seizures, and other central nervous system effects, including death.

*Ingestion (Swallowing):* Low order of acute oral toxicity. May cause throat irritation, nausea, vomiting, cardiac injury with arrhythmias (irregular heartbeats), and symptoms of central nervous system effects as listed for *ACUTE Inhalation*. Breathing material into the lungs during ingestion or vomiting may cause mild to severe pulmonary (lung) injury and possibly death.

**CHRONIC:** Prolonged or repeated skin contact may cause drying and cracking, or dermatitis. Prolonged or repeated eye contact may cause conjunctivitis. Prolonged or repeated inhalation of high vapor concentration has been reported to cause liver and kidney effects, fatal bone marrow hypoplasia (incomplete bone marrow development), and intracerebral (brain) hemorrhage.

#### MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:

Individuals with pre-existing lung, liver, kidney, cardiac, central nervous system, or skin disorders may have increased susceptibility to the effects of exposure

#### CARCINOGENICITY:

Not applicable.

Also see Section 9.

#### OTHER POTENTIAL HEALTH HAZARDS:

The following information is required by Canadian WHMIS regulations. Irritancy is covered in Signs and Symptoms of Exposure in Section 4. There is no known human sensitization, toxicologically synergistic product, reproductive toxicity, mutagenicity, or teratogenicity associated with this product as a whole.

**SAFETY-KLEEN PREMIUM SOLVENT**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**SECTION 5 -- FIRE AND EXPLOSION HAZARD DATA**

<b>EMERGENCY RESPONSE GUIDE NUMBER:</b>	27 Reference <i>Emergency Response Guidebook</i> (DOT P 5800.5)
<b>FIRE AND EXPLOSION HAZARDS:</b>	Decomposition and combustion products may be toxic. Heated containers may rupture, explode, or be thrown into the air. Not sensitive to mechanical impact. Material may be sensitive to static discharge, which could result in fire or explosion.
<b>FIRE FIGHTING PROCEDURES:</b>	NFPA 704 Rating 1-2-0 (Health-Fire-Reactivity) Keep storage containers cool with water spray. Positive-pressure, self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.
<b>EXTINGUISHING MEDIA:</b>	Carbon dioxide, foam, dry chemical, or water spray.
<b>CONDITIONS OF FLAMMABILITY:</b>	Heat, sparks, or flame.
<b>FLASH POINT:</b>	148°F (64°C) Tag Closed Cup (minimum)
<b>AUTOIGNITION TEMPERATURE:</b>	440°F (227°C) (minimum)
<b>FLAMMABLE LIMITS IN AIR:</b>	<b>LOWER:</b> 1.0 Vol. % <b>UPPER:</b> 8.1 Vol. %
<b>HAZARDOUS COMBUSTION PRODUCTS:</b>	Burning may produce carbon monoxide.

**SECTION 6 -- REACTIVITY DATA**

<b>STABILITY:</b>	Stable under normal temperatures and pressures, and not reactive with water.
<b>INCOMPATIBILITY (MATERIALS AND CONDITIONS TO AVOID):</b>	Acids, bases, oxidizing agents, or chlorine may cause a violent reaction. Avoid heat, sparks, or flame.
<b>HAZARDOUS POLYMERIZATION:</b>	Not known to occur under normal temperatures and pressures.
<b>HAZARDOUS DECOMPOSITION PRODUCTS:</b>	None under normal temperatures and pressures.

**SECTION 7 -- PREVENTIVE MEASURES**

**PRECAUTIONS FOR SAFE USE AND HANDLING**

<b>HANDLING PRECAUTIONS:</b>	Keep away from heat, sparks, or flame. When transferring material, metal containers, including tank cars and trucks, should be grounded and bonded. Avoid contact with eyes, skin, clothing, or shoes. Use in well ventilated area and avoid breathing vapor or mist.
<b>PERSONAL HYGIENE:</b>	Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco products. Clean contaminated clothing, shoes, and protective equipment before reuse. Discard contaminated clothing, shoes, or protective equipment if they cannot be thoroughly cleaned.
<b>SHIPPING AND STORING PRECAUTIONS:</b>	Keep container tightly closed when not in use and during transport. Do not pressurize, drill, cut, heat, weld, braze, grind, or expose containers to flame or other sources of ignition. Empty product containers may contain product residue. See Section 9 for Packing Group information.

# SAFETY-KLEEN PREMIUM SOLVENT

## MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

**SPILL PROCEDURES:** Remove all ignition sources. Stop leak if you can do it without risk. Wear protective equipment specified in Section 7, CONTROL MEASURES. Ventilate area and avoid breathing vapor or mist. Water spray may reduce vapor, but it may not prevent ignition in closed spaces. For large spills, isolate area and deny entry; dike far ahead of liquid spill for later disposal. Contain away from surface waters and sewers. If possible, contain as a liquid for possible re-refining or sorb with compatible sorbent material and shovel with a non-sparking tool into closable container for disposal. See *Emergency Response Guidebook* (DOT P 5800.5) Guide Number 27 for more information.

**WASTE DISPOSAL METHODS:** Dispose in accordance with federal, state, provincial, and local regulations. Contact Safety-Kleen regarding recycling or proper disposal.

### CONTROL MEASURES

**EYE PROTECTION:** Where there is likelihood of eye contact, wear chemical goggles and faceshield. Do NOT wear contact lenses.

**PROTECTIVE GLOVES:** Use Nitrile, Viton<sup>®</sup>, or equivalent gloves to prevent contact with skin. Do NOT use Butyl rubber, natural rubber, or equivalent gloves.

**RESPIRATORY PROTECTION:** Use NIOSH/MSHA-approved respiratory protective equipment when concentration of vapor or mist exceeds applicable exposure limit. A self-contained breathing apparatus (SCBA) and full protective equipment are required for large spills or fire emergencies. Selection and use of respiratory protective equipment should be in accordance in the U.S.A. with OSHA General Industry Standard 29 CFR 1910.134 or in Canada with CSA Standard Z94.4-M1982.

**ENGINEERING CONTROLS:** Provide process enclosure or local ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where explosive mixtures may be present, systems safe for such locations should be used.

**OTHER PROTECTIVE EQUIPMENT:** Where spills and splashes are possible, wear appropriate solvent-resistant boots, apron, or other protective clothing. Clean water should be available in work areas for flushing the eyes and skin.

## SECTION 8 -- PHYSICAL DATA

**PHYSICAL STATE, APPEARANCE AND ODOR:** Liquid, clear, colorless, with characteristic hydrocarbon odor.

**ODOR THRESHOLD:** 30 ppm (based on Stoddard Solvent)

**SPECIFIC GRAVITY:** 0.78 to 0.82 (60°/60°F) (15.6°/15.6°C) (water = 1)

**DENSITY:** 6.5 to 6.8 lb/US gal (780 to 820 g/l)

**VAPOR DENSITY:** 5.3 to 6.2 (air = 1)

**VAPOR PRESSURE:** 1 to 2 mm Hg at 68°F (20°C)

**BOILING POINT:** 350° to 470°F (177° to 244°C)

**FREEZING POINT:** -33°F (-36°C) (approximately)

**pH:** Not applicable.

**VOLATILE ORGANIC COMPOUNDS: (US EPA DEFINITION)** 100 WT %; 6.5 to 6.8 lb/US gal; 780 to 820 g/l

**EVAPORATION RATE:** less than 0.1 (butyl acetate = 1)

**SOLUBILITY IN WATER:** Slight.

**SOCIETY-KLEEN PREMIUM SOLVENT**  
**MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA**

**COEFFICIENT OF WATER/OIL DISTRIBUTION:** Not available.

**MOLECULAR WEIGHT:** 155 to 180

**SECTION 9 -- OTHER REGULATORY INFORMATION**

**TRANSPORTATION INFORMATION**

**DOT PROPER SHIPPING NAME:** COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)

**DOT CLASS:** Combustible Liquid

**DOT ID NUMBER:** NA1993 PG III

**TDG CLASSIFICATION:** Not regulated.

**SARA TITLE III:** Product does not contain toxic chemicals subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372.

Product poses the following physical and health hazards as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986:

Immediate (Acute) Health Hazard  
Delayed (Chronic) Health Hazard  
Fire Hazard

**WHMIS CLASSIFICATION:** B3, Flammable and Combustible Material, Combustible Liquids; D2B, Poisonous and Infectious Material, Materials Causing Other Toxic Effects, Toxic Material

**TSCA:** All of the components for this product are listed on, or are exempted from the requirement to be listed on, the TSCA Inventory.

**CALIFORNIA:** This product is not for sale or use in the State of California.

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet apply to the material as supplied to the user.

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Revision 07/93; Form No. 82529



**- COBRA GW-206 -**



**U.S. Environmental Protection Agency**  
**Contract No. 68-W4-0007**

**RCRA Enforcement, Permitting, and  
Assistance Contract—EPA Zone II**

**RECEIVED**

AUG 16 1995

Environmental Bureau  
Oil Conservation Division



**PRC Environmental Management, Inc.**



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**CASE DEVELOPMENT INSPECTION**

**COBRA INDUSTRIES, INC.  
HOBBS, NEW MEXICO**

**INSPECTION REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Solid Waste  
Washington, DC 20460**

Work Assignment No.	:	R06032
EPA Region	:	6
Date Prepared	:	July 6, 1995
Contract No.	:	68-W4-0007
Prepared by	:	PRC Environmental Management, Inc.
Telephone No.	:	214/754-8765
EPA Work Assignment Manager	:	Mr. Gregory Pashia
Telephone No.	:	214/665-2287

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### Appendix

A	FACILITY LOCATION MAP
B	FACILITY LAYOUT MAP
C	SAMPLING LOCATION MAP
D	SUMMARY OF ANALYTICAL RESULTS
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G	CHAIN-OF-CUSTODY FORMS
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### Attachments

A	PRC ANALYTICAL DATA SUMMARY SHEETS
B	PLATS OF COBRA PROPERTY AND BUILDINGS
C	COBRA'S TOXICITY CHARACTERISTIC LEACHING PROCEDURE AND OTHER CHARACTERISTICS ANALYSIS OF SAND TRAP (WASH BAY SUMP) SLUDGE
D	DESIGN PLANS FOR WASH BAY SUMP
E	NEW MEXICO ENVIRONMENT DEPARTMENT SUMMARY OF DISCHARGE PLAN FOR LEA COUNTY SEPTIC TANK SERVICE
F	E & E ENTERPRISES NONHAZARDOUS WASTE MANIFEST FOR COBRA'S USED OIL
G	MATERIAL SAFETY DATA SHEET FOR VARSOL (MINERAL SPIRITS)
H	COBRA'S TOXICITY CHARACTERISTIC LEACHING PROCEDURE LEAD ANALYSIS OF SPENT SANDBLAST MEDIA

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R06032 from the U.S. Environmental Protection Agency (EPA) under Resource Conservation and Recovery Act (RCRA) Enforcement, Permitting, and Assistance (REPA) Contract No. 68-W4-0007. Under this work assignment, PRC is assisting EPA in conducting unannounced compliance evaluation inspections and case development inspections (CDI) at various facilities in New Mexico. To accomplish this task, PRC (1) performed file reviews, (2) provided technical assistance to EPA in conducting unannounced on-site inspections, (3) collected samples of waste streams, if necessary, and (4) generated inspection reports to document inspection activities. The inspections were conducted in conjunction with the EPA Region 6 RCRA Enforcement Branch Pesticide Toxicity Characteristic Leaching Procedure (TCLP) Enforcement Initiative.

This report summarizes the CDI of the Cobra Industries, Inc. (Cobra), facility in Hobbs, Lea County, New Mexico. Section 2.0 provides background facility data; Section 3.0 describes inspection activities and waste management units; and Section 4.0 is a summary. Appendices A through H contain information compiled by PRC, and Attachments A through H contain information provided to PRC. All material referenced in this report is included in the appendices or attachments.

## 2.0 BACKGROUND

Cobra is located at 720 Texaco Road in Hobbs, New Mexico (Appendix A, Figure A-1). Since the mid-1980s, Cobra has supported the oil field industry by (1) manufacturing or repairing oil field tanks and tanker trailers (tankers), (2) painting new or repaired tanks or tankers, (3) performing hydrostatic tests of tanks, tankers, and portable product chemical tote tanks (tote tanks), and (4) reworking oil wells. Cobra also maintains its service fleet of trucks and pulling units on site.

Following are the facility data:

- Facility Address—720 Texaco Road  
P.O. Box 2040  
Hobbs, NM 88241-2040

- Telephone—(505) 393-1491
- EPA Identification Number—None

### 3.0 INSPECTION ACTIVITIES

On April 26, 1995, at 0800, personnel from EPA and PRC arrived at the Cobra facility to conduct an unannounced RCRA CDI of the facility. The purpose of the CDI was to (1) inspect the facility's waste management practices, (2) identify whether the facility was potentially managing hazardous waste, and, if necessary, (3) collect samples from specific waste streams to support potential enforcement actions.

Mr. Greg Pashia, the EPA enforcement officer, began the inspection by explaining the purpose of the visit and introducing the team members. Mr. Harold Ogle, safety director of the facility, and Mr. Chuck Landrum, facility manager, outlined the facility history and the waste management activities at the facility. The following personnel participated in the CDI:

- Gregory Pashia            EPA
- Mark Butler             PRC
- Jeff Ayers                PRC
- Lynette Collins         PRC
- Luis Vega                PRC
- Harold Ogle              Cobra
- Chuck Landrum          Cobra

After the initial meeting, EPA and PRC personnel began the inspection by conducting a site reconnaissance. Mr. Ogle provided PRC with the following documents:

- Plats of the Cobra Property and Buildings (Attachment B)
- Cobra's TCLP Analysis of the Sand Trap (Wash Bay Sump) Sludge (Attachment C)

- Design Plans for the Wash Bay Sump (Attachment D)
- New Mexico Environment Department Summary of Discharge Plan for Lea County Septic Tank Service (Attachment E)
- E & E Enterprises Nonhazardous Waste Manifest for Cobra's Used Oil (Attachment F)
- Material Safety Data Sheet for Varsol (Mineral Spirits) (Attachment G)
- Cobra's TCLP Analysis of Spent Sandblast Media (Attachment H)

Appendices E and F contain photographs and inspection notes, respectively. The following subsections present specific information regarding facility processes and waste management units (and associated sampling activities, where applicable) identified during the inspection.

### **3.1 WASH BAY SUMP**

Cobra conducts various activities within the wash bay, which is located along the west side of the paint shop (Attachment B, Figure B-1). Activities include (1) steam cleaning of tanks, tankers, and vehicles, (2) welding or hot work, (3) hydrostatic testing of tanks, tankers, and tote tanks, and (4) acid washing of the steam cleaner. These activities generate waste liquids and sludges that were routed to the wash bay sump, or "sand trap" (sump). According to the facility, the aqueous phase of the sump contents is discharged to the city sewer system. The lighter oily phase—or float—is skimmed off the surface to prevent its discharge to the city sewer, and stored in open drums within the wash bay. The heavier sludge accumulates at the bottom of the sump. During the inspection, six partially-filled 55-gallon drums of float were in the wash bay. According to the facility, Lea County Septic Tank Service (LCSTS) pumps the sump contents—including the drum contents, float, and sludge (but not the aqueous phase)—into a vacuum truck and hauls the them to an evaporation lagoon for disposal about every 6 months (Attachment E). The facility estimated that about 400 gallons of waste liquid and sludge are removed every 6 months. During the inspection, PRC estimated the volume of waste in the drums and sump to be about 230 and 1,060 gallons, respectively (Appendix F; Appendix H).

The dimensions of the concrete sump, which is recessed in the floor of the wash bay, are 7.5 feet long by 4.3 feet wide by 5.3 feet deep (Appendix F). A 4-inch-thick concrete partition, or weir, divides the sump into two compartments. Based on these dimensions, the sump has an estimated volumetric capacity of nearly 1,200 gallons. A 28-foot-long drain, which extends the length of the wash bay, collects drainage and diverts it into the sump. During the inspection, the sump contained about 56 inches of material, 37 inches comprising sludge and 19 inches comprising liquid waste (multi-phased non-aqueous layers, including float); there were about 8 inches of freeboard above the liquid level. The drain is about 14 inches (1.2 feet) wide and contained about 1 inch (0.08 foot) of sludge. According to the facility, the drain was last cleaned about 2 years ago. The contents of the drain are also disposed of by LCSTS. Theoretically, the aqueous phase and the float flow over the sump weir into the second compartment, while the sludge settles and remains in the first compartment (Attachment D). Except for the aqueous phase, which discharges to the city sewer system, LCSTS disposes of the contents of both compartments. However, during the inspection, PRC noted the absence of an aqueous phase and that the liquid contents of the sump were multi-phased.

On March 16, 1995, Cobra collected a sample of the sump contents—including the aqueous phase—for TCLP organic analysis, TCLP inorganic analysis, and for hazardous waste characteristics (Attachment C). Sample analysis detected cresols (methylphenols), benzene, arsenic, barium, and lead at concentrations below RCRA regulatory levels. However, the flash point of the waste was determined to be 88°F. Title 40, Code of Federal Regulations (40 CFR), Section 261.21 states that a solid waste exhibits the characteristic of ignitability if a representative sample of the waste has a flash point of less than 140°F.

As directed by EPA, PRC collected waste samples from the liquid (non-aqueous) and solid (sludge) phases of the sump contents. Grab samples of liquid waste—designated Cobra-SumpL-01 and Cobra-SumpL-02 (duplicate)—were analyzed for TCLP volatile organic compounds (VOC), TCLP semivolatile organic compounds (SVOC), total VOCs, flash point, and specific gravity (Appendix D; Attachment A). Analysis for total VOCs revealed from 388,800 to 412,900 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ) of benzene; 5 to 6 million  $\mu\text{g}/\text{kg}$  of toluene; 4 million  $\mu\text{g}/\text{kg}$  of ethylbenzene; and 10 million  $\mu\text{g}/\text{kg}$  of total xylenes. Analyses also revealed a flash point of 98°F—which characterizes the waste as RCRA hazardous, based on ignitability (40 CFR, Section 261.21)—and a specific gravity of 0.834. No TCLP VOCs or SVOCs were detected in the liquid waste samples.

Grab samples of sludge—designated Cobra-SumpS-03 and Cobra-SumpS-04 (duplicate)—were analyzed for TCLP VOCs, TCLP SVOCs, TCLP metals, total VOCs, and specific gravity (Appendix C, Figure C-1; Appendix D, Table D-1; Attachment A). Analysis for TCLP VOCs revealed concentrations ranging from 538 to 652 micrograms per liter ( $\mu\text{g}/\text{L}$ ) of benzene and 208 to 222  $\mu\text{g}/\text{L}$  of 2-butanone. Analysis for TCLP metals revealed concentrations ranging from 1.80 to 3.68  $\mu\text{g}/\text{L}$  of barium. The TCLP benzene results exceeded the TCLP regulatory level of 500  $\mu\text{g}/\text{L}$ . Analysis for total VOCs revealed 56,100  $\mu\text{g}/\text{kg}$  of benzene; from 732,800 to 938,500  $\mu\text{g}/\text{kg}$  of toluene; 503,100  $\mu\text{g}/\text{kg}$  of ethylbenzene; and 2 million  $\mu\text{g}/\text{kg}$  of total xylenes. Analysis also indicated a specific gravity of 1.28. No TCLP SVOCs were detected in the sludge samples.

The quantity of waste in the sump was calculated on the basis of the waste volume and specific gravity (Appendix H). During the CDI, the sump contained about 1,135 kilograms of liquid waste and 3,372 kilograms of sludge, for a total of 4,507 kilograms. The quantities of waste stored in the six adjacent drums and the sump drain were also calculated on the basis of the specific gravities of the liquid waste and sludge in the sump, respectively. Drummed waste accounted for an additional 720 kilograms of waste quantity, and the drain sludge accounted for an additional 98 kilograms, for a total waste quantity of 5,325 kilograms attributable to the sump. TCLP benzene analysis of the sump sludge revealed a concentration exceeding the RCRA toxicity characteristic regulatory level. Analysis revealed that the sump liquid waste exhibits the RCRA characteristic of ignitability, with a flash point lower than 140°F (40 CFR, Section 261.21).

### **3.2 CARBURETOR CLEANER TANK**

The carburetor cleaner tank (carb tank), located in the northwest corner of the wash bay, is an elevated rectangular steel structure with a hinged lid (Appendix B, Figure B-1). According to the facility, the carb tank contains carburetor cleaner that has historically been used to clean oil and paint off of various parts. According to the facility, the carb tank has not been used since at least 1992 and its liquid contents have not been analyzed. The dimensions of the carb tank are 3 feet deep by 2.7 feet wide by 3.7 feet long, and its volumetric capacity is estimated at about 225 gallons. During the inspection, the carb tank contained about 20 inches (1.7 feet) of liquid waste; a thin bottom layer of sludge was evident.

As directed by EPA, PRC collected a grab sample of liquid waste—designated Cobra-Carbtank-05—from the carb tank for analyses for TCLP VOCs, TCLP SVOCs, total VOCs, ignitability, and specific gravity (Appendix C, Figure C-1; Appendix D, Table D-1; Attachment A). Analysis for TCLP SVOCs revealed 14.87 million  $\mu\text{g/L}$  of 2-methylphenol (o-cresol) and 6.465 million  $\mu\text{g/L}$  of 3- and 4-methylphenols (m- and p-cresols). The TCLP methylphenol results exceeded the RCRA regulatory level of 200,000  $\mu\text{g/L}$ . Analysis for total VOCs detected 910,000  $\mu\text{g/L}$  of methylene chloride. Analyses also revealed a flash point greater than 200°F and a specific gravity of 0.980.

The quantity of waste in the carb tank was calculated on the basis of the waste volume and specific gravity determinations (Appendix H). During the CDI, the carb tank contained about 470 kilograms of liquid waste. TCLP methylphenols analyses of the carb tank liquid waste revealed concentrations exceeding applicable RCRA toxicity characteristic regulatory levels.

### **3.3 RINSE WATER STORAGE TANK**

The rinse water storage tank (water tank) is located south of the paint shop, at the entrance to the wash bay (Appendix B, Figure B-1). Water from the water tank is used for hydro-testing and cleaning of tanks, tankers, and tote tanks in the wash bay. Most of the water is recirculated back into the water tank; however, some water is lost to the wash bay sump. Cobra has reused the stored water for over 2 years and replaces water lost as needed. The storage capacity of the water tank is about 400 barrels, or over 16,000 gallons. According to the facility, tote tanks are cleaned by the customer before hydro-testing. Cobra estimated that it conducts hydrostatic tests on about 15 to 20 tote tanks—ranging from 300 to 750 gallons in capacity—per year for Western Unichem of Hobbs, New Mexico.

As directed by EPA, PRC collected aqueous grab samples—designated Cobra-Watertank-06 and Cobra-Watertank-07 (duplicate)—from the water tank for analyses for TCLP VOCs and total VOCs (Appendix C, Figure C-1; Appendix D, Table D-1; Attachment A). Analysis for TCLP and total VOCs did not detect any hazardous constituents.

### 3.4 USED OIL STORAGE TANK

The used oil storage tank (oil tank), located outside the north wall of the maintenance building, is a rectangular steel tank with a capacity of about 940 gallons (Appendix B, Figure B-1). It measures 7 feet long by 6 feet wide by 3 feet high; the height of the liquid waste within the oil tank was 21 inches (1.75 feet). According to the facility, used lubricating oils, transmission fluid, chain oil, gear oil, and motor oil are placed in the oil tank. About every 3 months, when the oil tank reaches capacity, E & E Enterprises (E&E) collects the used oil and hauls the oil to its recycling facility in Brownfield, Texas (Attachment F). E&E sells the recycled oil as an ingredient for making asphalt. Because the states of Texas and New Mexico have not adopted the used oil management standards in 40 CFR Part 279, the former 40 CFR Part 266 regulations still apply.

During a February 1995 inspection, the New Mexico Oil Conservation Division (NMOCD) warned Cobra against mixing its spent solvents with its used oil. Until about 2 weeks before the CDI, when Cobra began using Safety-Kleen Corporation (Safety-Kleen) parts washers and service, spent solvent was placed in the oil tank. Cobra estimates that about 100 gallons per year of Varsol were added to the oil tank. According to the material safety data sheet (MSDS) provided by Cobra, Varsol is a trade name for mineral spirits (nonexempt) that contain less than 4 percent trimethylbenzenes (Attachment G). The facility currently uses three Safety-Kleen parts washers (Appendix B, Figure B-1).

As directed by EPA, PRC collected a grab sample of liquid waste—designated Cobra-Oiltank-08—from the oil tank for analyses for TCLP VOCs, total VOCs, and specific gravity (Appendix C, Figure C-1; Appendix D, Table D-1; Attachment A). Analysis for total VOCs detected 51,000  $\mu\text{g}/\text{L}$  of toluene; 100,000  $\mu\text{g}/\text{L}$  of ethylbenzene; and 210,000  $\mu\text{g}/\text{L}$  of total xylenes. Although these VOCs were detected in the oil tank sample, the MSDS for Varsol does not list them as constituents (Attachment G). Analysis also revealed a specific gravity of 0.818. TCLP VOCs were not detected in the waste sample.

The quantity of used oil in the oil tank was calculated on the basis of the waste volume and specific gravity determinations (Appendix H). During the CDI, the oil tank contained about 1,698 kilograms of used oil.

### 3.5 STAINED SOIL AREAS

The inspection team observed several areas of stained soil throughout the facility property (Appendix B, Figure B-1). Black-stained soil was evident (1) around the oil tank, (2) underneath a leaking crude oil tanker awaiting hydro-testing and repair, and (3) on and around a concrete pad on which pulling units are maintained and repaired. Several piles of dried sludge were observed near the southeast corner of the facility. According to Cobra, the sludge was deposited there over 2 years ago and may have been generated in the wash bay sump. Next to the air tank and compressor, along the outside of the east wall of the maintenance and tank construction building, the inspection team observed an area of red-stained soil. Facility representatives reported that the compressor exploded last year, and that absorbent material, or floor sweep, was used to absorb the compressor oil and transmission fluid. The saturated floor sweep was then deposited directly onto the ground, resulting in staining of the soil.

As directed by EPA, PRC collected a grab sample of soil—designated Cobra-Soil-09 and Cobra-Soil-10 (duplicate)—from the red-stained soil and floor sweep next to the air tank and compressor for analyses for TCLP VOCs and total VOCs (Appendix C, Figure C-1; Appendix D, Table D-1; Attachment A). Analysis for TCLP VOCs revealed from 196 to 302  $\mu\text{g}/\text{kg}$  of 2-butanone, which is below the RCRA regulatory level of 200,000  $\mu\text{g}/\text{kg}$ . Analysis for total VOCs detected from 1 to 2 million  $\mu\text{g}/\text{kg}$  of ethylbenzene and from 6 to 10 million  $\mu\text{g}/\text{kg}$  of total xylenes. It appears that these releases resulted in contamination of the soil with hazardous constituents based on visual observation of the area and analytical results from samples collected from the area.

### 3.6 OTHER WASTE MANAGEMENT ACTIVITIES

Cobra conducts its painting operations in the paint shop (Appendix B, Figure B-1). Products used include paint and paint thinner. According to facility representatives, empty paint and paint thinner containers, paper, and tape are disposed of in a Dumpster serviced by Waste Management, Inc. Paint hose lines are flushed and cleaned with acrylic lacquer thinner. The thinner remaining in the lines is then sprayed on the floor to evaporate. Unifirst Services handles the used paint and solvent rags; their ultimate disposition is not known. Cobra uses the abandoned furnace attached to the paint shop for storage of several 5-gallon paint cans—which are reused—and three 55-gallon drums of unknown

contents. Cobra stated that they plan to have the drum contents analyzed; their final disposition will depend on the analytical results. According to the facility, used batteries were stored in the abandoned furnace until the February 1995 NMOCD inspection; the batteries have since been collected by Interstate Battery System at the recommendation of NMOCD.

Product and waste drums were stored in several parts of the facility (Appendix B, Figure B-1). Cobra stores used antifreeze mixed with water in five 55-gallon drums located in the northeast corner. According to the facility, the contents are stored in empty, clean drums marked "kerosene" and are reused during the summer months. Along the southern property line, Cobra stores several 5-gallon buckets of used transmission fluid and used motor oil. Full and partially-full drums were also observed within, and next to, the abandoned furnace; along the east wall of the maintenance and tank construction building; and next to the oil tank.

The sandblasting area is located directly south of the paint shop (Appendix B, Figure B-1). Cobra sandblasts the inside and outside of tanks and tankers, some of which may be painted. Heavy particles and rust are separated from the used sand, which is reused. TCLP metals analyses of three spent sand samples collected by Cobra revealed from 0.16 to 0.84 part per million (ppm) of lead, which is below the RCRA regulatory level of 5 ppm (Attachment H).

The fueling area—located in the southwestern part of the facility—consists of two large aboveground diesel fuel tanks, a liquid propane tank, an elevated 500-gallon methanol tank, and a fueling island (Appendix B, Figure B-1). According to Cobra, the diesel tanks have leaked in the past, as evidenced by the metal patches and stained soil along the sides of one tank. Currently, there is no containment system for the various fuel tanks, but Cobra plans to install new tanks with a containment system.

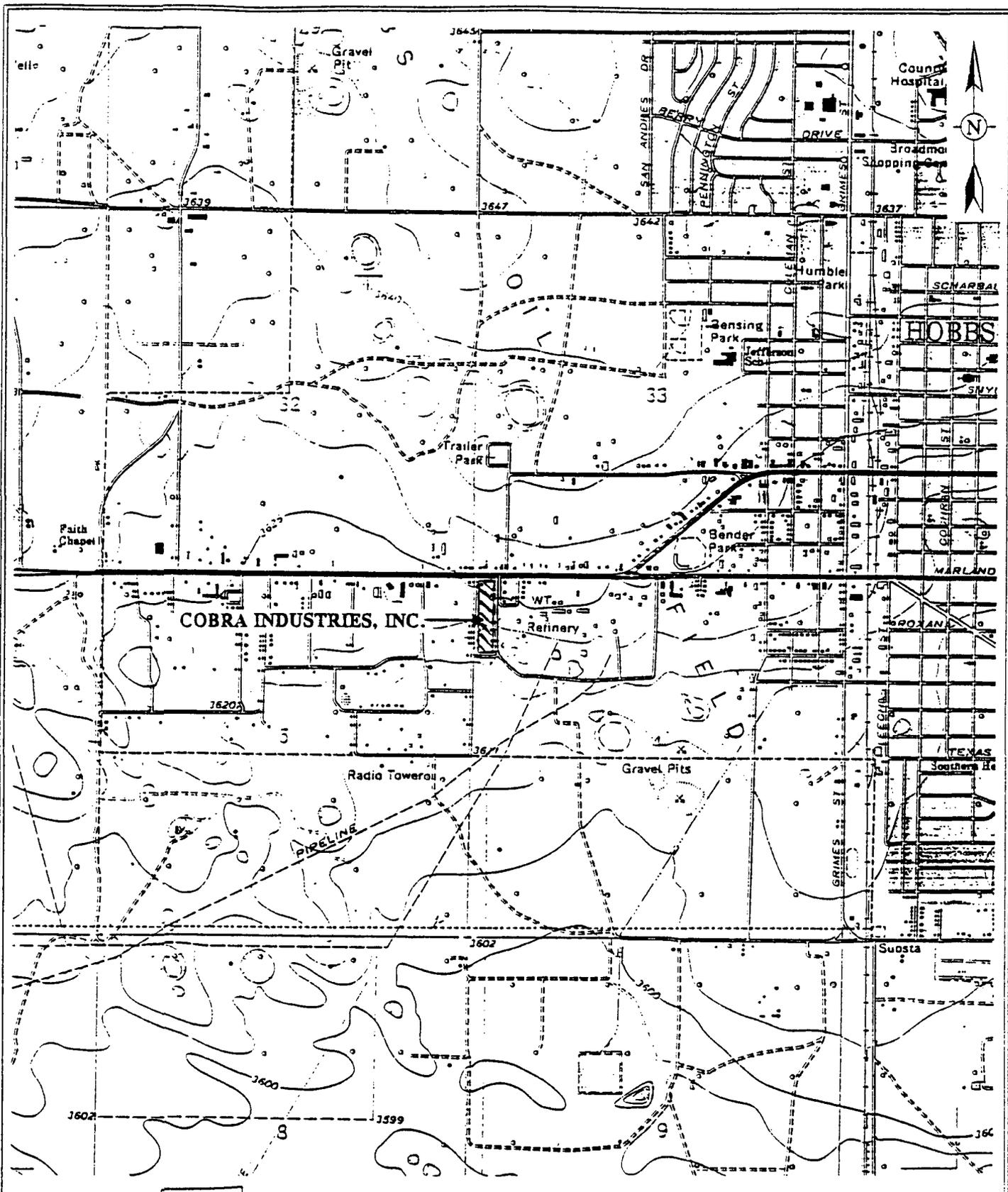
Scrap metal and metal parts are stored in the scrap and storage yard until they are reused by the facility or collected by a scrap metal salvage contractor.

#### 4.0 SUMMARY

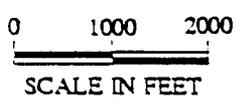
PRC provided technical assistance to EPA Region 6 in conducting a CDI of Cobra, an oil field service company that (1) manufactures or repairs oil field tanks and tankers, (2) paints new or repaired tanks and tankers, (3) performs hydrostatic tests of tanks, tankers, and totes, and (4) reworks oil wells. Cobra has been in operation in Hobbs, New Mexico, since the mid-1980s.

As directed by EPA, PRC collected samples from several waste management units at Cobra, including the wash bay sump, the carb tank, the water tank, the oil tank, and an area of stained soil near the air compressor. Analyses of the sump contents revealed 3,470 kilograms of sludge with benzene concentrations exceeding the RCRA toxicity characteristic regulatory level and 1,855 kilograms of non-aqueous liquid waste exhibiting the RCRA characteristic of ignitability with a flash point lower than 140°F. LCSTS collects the sump contents and hauls them to an evaporation lagoon for disposal. Analysis of the carb tank contents revealed 470 kilograms of waste, with methylphenol concentrations exceeding the allowable maximum RCRA toxicity characteristic regulatory level. According to the facility, the carb tank has not been used since at least 1992 and its liquid contents have not been analyzed. Analysis of oil tank contents detected 51,000  $\mu\text{g}/\text{L}$  of toluene; 100,000  $\mu\text{g}/\text{L}$  of ethylbenzene; and 210,000  $\mu\text{g}/\text{L}$  of ethylbenzene, in about 1,698 kilograms of used oil. E&E collects the used oil, recycles it, and sells it as an ingredient for making asphalt. Analysis of stained soil next to the air compressor detected from 196 to 302  $\mu\text{g}/\text{kg}$  of TCLP 2-butanone, from 1 to 2 million  $\mu\text{g}/\text{kg}$  ethylbenzene, and from 6 to 10 million  $\mu\text{g}/\text{kg}$  total xylenes.

**APPENDIX A**  
**FACILITY LOCATION MAP**  
**(One Sheet)**



QUADRANGLE LOCATION



SCALE IN FEET

COBRA INDUSTRIES, INC.  
HOBBS, NEW MEXICO

FIGURE A-1  
FACILITY LOCATION MAP

**PRC** Environmental Management, Inc.

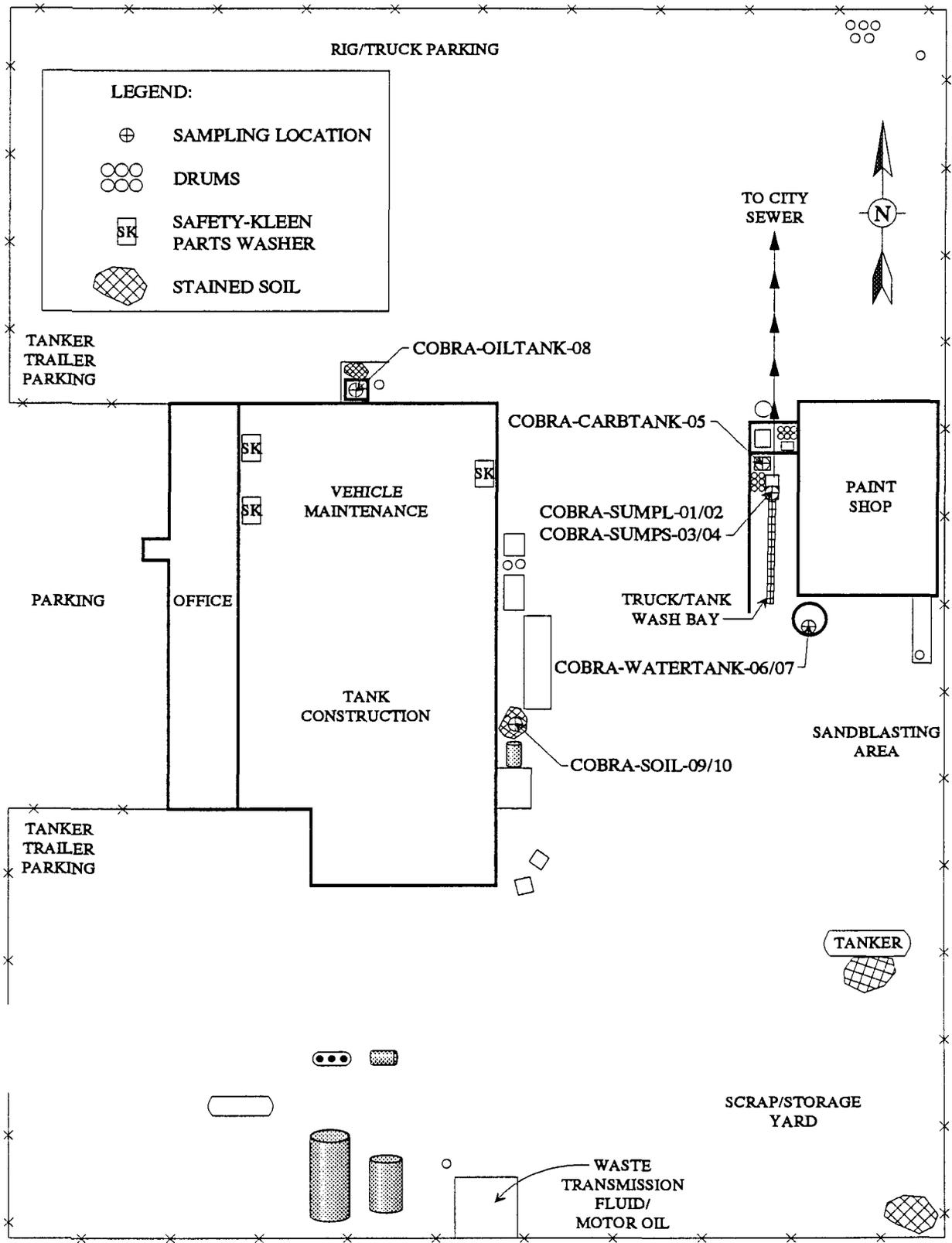
SOURCE: MODIFIED FROM USGS, HOBBS WEST, NEW MEXICO, QUADRANGLE, 1979

**APPENDIX B**  
**FACILITY LAYOUT MAP**  
**(One Sheet)**



**APPENDIX C**  
**SAMPLING LOCATION MAP**  
**(One Sheet)**

TEXACO ROAD



COBRA INDUSTRIES, INC.  
HOBBS, NEW MEXICO

FIGURE C-1  
SAMPLING LOCATION MAP

SOURCE: MODIFIED FROM "A" WELDERS AND SUPPLY COMPANY, JULY 13, 1988

NOT TO SCALE

**PRC** Environmental Management, Inc.

**APPENDIX D**  
**SUMMARY OF ANALYTICAL RESULTS**  
**(One Sheet)**

TABLE D-1

## SUMMARY OF ANALYTICAL RESULTS

Waste Unit	Wash Bay Sump				Carburetor Cleaner Tank	Rinse Water Storage Tank		Used Oil Storage Tank	Stained Soil Area	
Sample Designation	Cobra- SumpL-01	Cobra- SumpL-02 (Duplicate)	Cobra- SumpS-03	Cobra- SumpS-04 (Duplicate)	Cobra-Carbtank- 05	Cobra-Watertank- 06	Cobra-Watertank- 07 (Duplicate)	Cobra- Oiltank-08	Cobra-Soil- 09	Cobra- Soil-10 (Duplicate)
Detected Constituent	TCLP Volatile Organic Compounds (SW-846 Methods 1311/8240)									
Benzene	ND	ND	538*	652*	ND	ND	ND	ND	ND	ND
2-Butanone	ND	ND	222	208	ND	ND	ND	ND	302	196
Detected Constituent	TCLP Semivolatile Organic Compounds (SW-846 Methods 1311/8270)									
2-Methylphenol	ND	ND	ND	ND	14,870,000*	NA	NA	NA	NA	NA
3 + 4-Methylphenol	ND	ND	ND	ND	6,465,000*	NA	NA	NA	NA	NA
Detected Constituent	TCLP Metals (SW-846 Methods 1311/6010/7000)									
Barium	NA	NA	1.80	3.68	NA	NA	NA	NA	NA	NA
Detected Constituent	Total Volatile Organic Compounds (SW-846 Method 8240)									
Benzene	412,900 J	388,800 J	ND	56,100 J	ND	ND	ND	ND	ND	ND
Toluene	6,000,000 D	5,000,000 D	732,800 J	938,500 D	ND	ND	ND	51,000	ND	ND
Ethylbenzene	4,000,000 D	4,000,000 D	ND	503,100 D	ND	ND	ND	100,000	1,000,000 D	2,000,000 D
Xylene	10,000,000 D	10,000,000 D	2,000,000 D	2,000,000 D	ND	ND	ND	210,000	6,000,000 D	10,000,000 D
Methylene chloride	ND	ND	ND	ND	910,000	ND	ND	ND	ND	ND
Flash point (°F)	98 <sup>b</sup>	NA	NA	NA	>200	NA	NA	NA	NA	NA
Specific gravity	0.834	NA	1.28	NA	0.980	NA	NA	0.818	NA	NA

## Notes:

All concentrations are reported in parts per billion (micrograms per liter or micrograms per kilogram)

D = Diluted analysis

J = Estimated concentration

NA = Not analyzed

ND = Not detected

RCRA = Resource Conservation and Recovery Act

TCLP = Toxicity characteristic leaching procedure

<sup>a</sup> Concentration exceeds allowable maximum RCRA toxicity characteristic regulatory level.

<sup>b</sup> Exhibits RCRA characteristic of ignitability with a flash point lower than 140°F.

**APPENDIX E**  
**PHOTOGRAPHS**  
**(11 Sheets)**

PHOTOGRAPH NO. 1



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: S  
Picture Description: Cobra Industries, Inc. (Cobra), facility sign

PHOTOGRAPH NO. 2



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Cobra truck and tank wash bay; note drain along center of wash bay.

PHOTOGRAPH NO. 3



Date: 04/26/95 Picture Taken by: Luis Vega, PRC Direction Facing: NE  
Picture Description: PRC collecting liquid-phase waste samples Cobra-SumpL-01 and Cobra-SumpL-02  
(duplicate) from wash bay sump

PHOTOGRAPH NO. 4



Date: 04/26/95 Picture Taken by: Luis Vega, PRC Direction Facing: NE  
Picture Description: PRC collecting solid-phase waste samples Cobra-SumpS-03 and Cobra-SumpS-04  
(duplicate) from wash bay sump

PHOTOGRAPH NO. 5



Date: 04/26/95 Picture Taken by: Luis Vega, PRC Direction Facing: NE  
Picture Description: Close-up view of Cobra wash bay sump and solid-phase waste sample collection

PHOTOGRAPH NO. 6



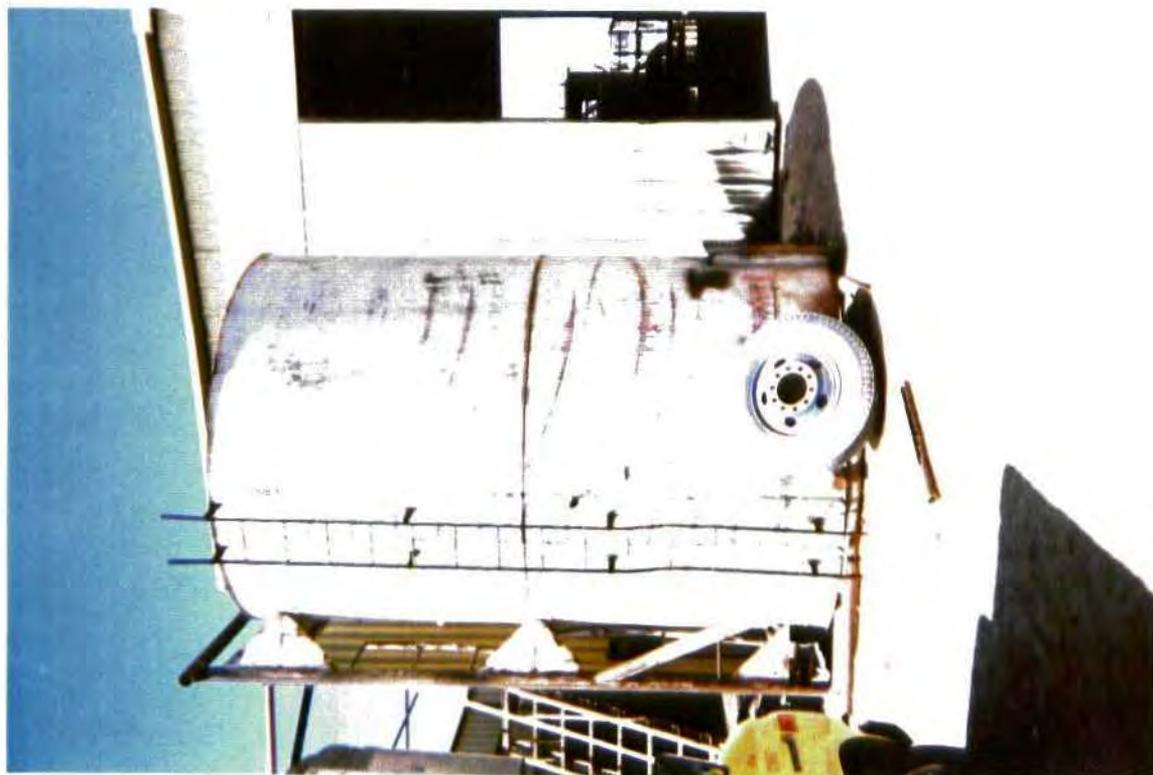
Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Six 55-gallon open-top drums filled with solid contents of wash bay sump; carburetor cleaner tank is visible in the background.

PHOTOGRAPH NO. 7



Date: 04/26/95 Picture Taken by: Mark Butler, PRC Direction Facing: NW  
Picture Description: PRC collecting liquid waste sample Cobra-Carbtank-05 from carburetor cleaner tank.

PHOTOGRAPH NO. 8



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Cobra's rinse water storage tank; PRC collected aqueous samples Cobra-Watertank-06 and Cobra-Watertank-07 (duplicate) from this tank.

PHOTOGRAPH NO. 9



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: W  
Picture Description: Cobra's used oil storage tank

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PHOTOGRAPH NO. 10



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: W  
Picture Description: Stained soil next to used oil storage tank

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PHOTOGRAPH NO. 11



Date: 04/26/95 Picture Taken by: Mark Butler, PRC Direction Facing: W  
Picture Description: PRC collecting waste sample Cobra-Oiltank-08 from used oil storage tank

PHOTOGRAPH NO. 12



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Fifty-five gallon drums located near northeast corner of facility; site representatives indicated that drums contained a mixture of antifreeze and water.

PHOTOGRAPH NO. 13



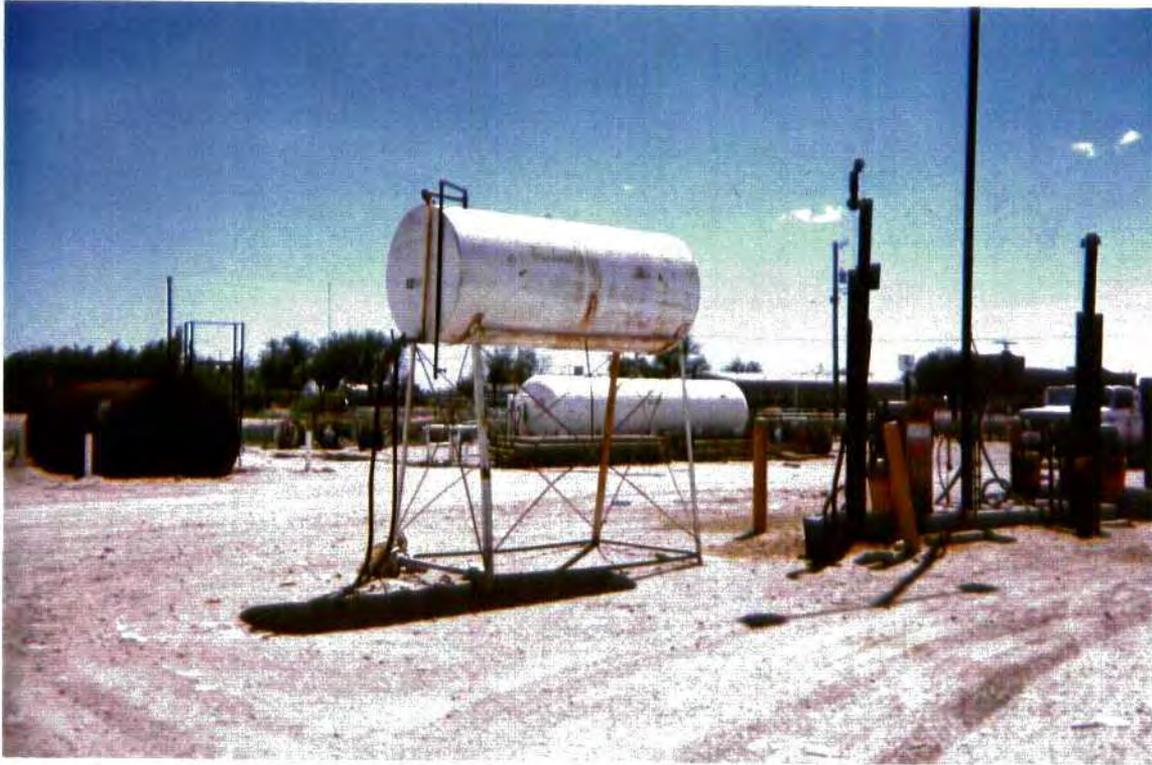
Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: SE  
Picture Description: Five-gallon buckets located along southern perimeter of facility; site representatives stated that buckets contained waste transmission fluid and motor oil.

PHOTOGRAPH NO. 14



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: S  
Picture Description: Fifty-five gallon drum located along southern perimeter, between 5-gallon waste buckets and aboveground diesel fuel storage tanks; drum contents are unknown.

PHOTOGRAPH NO. 15



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: SW  
Picture Description: Elevated methanol storage tank; note that tank has no containment system; diesel fuel storage tank (left) and liquid propane tank (right) are visible in background.

PHOTOGRAPH NO. 16



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: New Safety-Kleen Corporation (Safety-Kleen) parts washer; old parts washer is visible on right. Cobra managed its own waste solvents before contracting Safety-Kleen.

PHOTOGRAPH NO. 17



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: SW  
Picture Description: Interior of Cobra's paint shop

PHOTOGRAPH NO. 18



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Interior of abandoned furnace located outside of paint shop; note 5- and 55-gallon drum storage.

PHOTOGRAPH NO. 19



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: N  
Picture Description: Fifty-five gallon drum, labelled "acetone" located within abandoned furnace; upon inspection, drum was found to contain dark-brown liquid with low Microtip readings, indicating that liquid was not acetone.

PHOTOGRAPH NO. 20



Date: 04/26/95 Picture Taken by: Mark Butler, PRC Direction Facing: W  
Picture Description: Stained soil and absorbent material located next to air compressor, east of main building; PRC collected soil samples Cobra-Soil-09 and Cobra-Soil-10 (duplicate) at this location.

PHOTOGRAPH NO. 21



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: E  
Picture Description: Stained soil below leaking tanker trailer located in Cobra's scrap and storage yard

PHOTOGRAPH NO. 22



Date: 04/26/95 Picture Taken by: Lynette Collins, PRC Direction Facing: S  
Picture Description: Pile of stained soil or sludge located at southeast corner of facility; source of the pile is unknown.

**APPENDIX F**  
**INSPECTION NOTES**  
**(16 Sheets)**

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COBRA INDUSTRIES, INC. (5A)  
 170R0603215 M. Nutter 4-26-59

0800 ARRIVE AT COBRA. INSPECTORS ARE  
 GREG PASHIN, MARK BUTLER, JOFF  
 AYERS, LYNETTE COLLINS, AND LUIS VERA.  
 MET w/ HAROLD OGLE, SAFETY DIRECTOR.  
 AND CHUCK LANDRUM, SHOP MANAGER.  
 - PULLING UNIT REPAIR, VEHICLE REPAIR.  
 FUEL STORAGE TANKS, (PAINT AREA BLOG  
 TANK MANUFACTURING) SCRAP  
 REPAIR  
 - BUILD TRANSPORT TANKS THAT  
 HAUL OIL, WATER, OR KCl.  
 • PROCESSES, IN SUMMARY, ARE:  
 (1) TANK AND TRAILER TANK MANUFACT. 4/19/59  
 (2) PAINT AREA  
 (3) PULLING UNIT REPAIR  
 (4) VEHICLE REPAIR  
 REPAIR  
 - INSPECT SEVERAL TANKS ALONG  
 ROAD (1707 - LUNCH TANKS) ~~REF~~  
 & SOURCE OF WASTES IN THE TANKS  
 COULD BE CRUDE OIL, CONDENSATE, KCl,  
 BRINE WATER & OIL, OIL FIELD  
 CHEMICAL TANKS CAN BE CLEAN  
 CLEAN w/ WATER AND HYDROTEST.  
 ALSO TEST TOTEX FOR UNICLON.  
 USUALLY COME IN CLEAN. COBRA  
 TANKS WATER TO HYDROTEST.

(17)

45B

*[Faint, mostly illegible text, possibly bleed-through from the reverse side of the page]*

*M. Miller*

*4-26-94*

LUKRA IND.

4-26-94

M. Miller 17A0603215

(95)

- TRAILER TANKS TO BE TESTED THAT HAVE TO BE CLEANED AND STEAM CLEANED AT THE SUMPS.
- USED OIL AND STORED IN A TANK BY THE SHOP. TANK HOLDS ABOUT ~~1000~~<sup>940</sup> GALLONS. WASTE OIL IS COLLECTED BY F & E ENTREPRENEUR FROM SNOWFIELD TX. FILL THE TANK MAYBE EVERY 3 MONTHS. ~~THE~~ HOLD USED LUBRICATION OILS, TRANSMISSION FLUID, NO ANTIFREEZE, NO SOLVENTS, CHAIN OIL MAYBE, HYDRAULIC OIL.
- WASH BAY → WASH OUTSIDE OF PULLMAN UNITS, CLEAN INSIDE OF TRANSPORTS.
- CHECK OUT 750 gallon sump PARTITION IN sump acts AT A WEIR WHERE ~~THE~~ SOLIDS ARE MOSTLY CAUGHT. ~~LIQUID~~ LIQUID FLOW TO OTHER WEIR. PIP BELOW LIQUID LINE SENDS MORE AHEADS PHASE TO CITY SEWER SYSTEM.

(96)

COBRA  
17R0603215

M. Butler  
4-26-95

(97)

(\*)

(\*)

- CARBUATOR CLEANER IN WASH BAY HAS BEEN HERE SINCE 1992. COBRA STARTED IN 1985 OR 1986. CAPACITY = ?
- SOLIDS IN SUMP PUMPED OUT EVERY 6 MONTHS. "GATOR" OWNS A VACUUM SERVICE ~~TRUCK~~ AND DISPOSES OF ON-SITE OILS ON TOP OF OTHER HALF OF SUMP IS ALSO VACUUMED UP BY "GATOR". WILL GET DOCUMENTATION.
- MURIATIC ACID USED ABOUT 2x PER MONTH TO CLEAN CORROSION ON HAWK WATER & PULL UP IN STEAMER.
- DRUMS IN WASH BAY CONTAIN PLANT OIL FROM WEIR. DISPOSITION OF MATERIAL WILL DEPEND ON ANALYSIS HAWK DIRECTOR FROM OCO. <sup>WANTS TO KNOW WHETHER</sup> OCA ~~SUPPORTS~~ ~~THAT~~ THE OIL ~~THAT~~ CONTAINS HAZ. CONSTITUENTS. (HAZ WASTE). CAN TEL. GET RESULTS.
- WATER TANK NEXT TO WASH BAY. IT AND TEST TANKS IN THE BAY. WATER IS

M. Butler  
4/26/95

(48)

*[Faint, mostly illegible text, possibly bleed-through from the reverse side of the page.]*

*M. Butler*  
*4-26-95*

COBRA M. BUTLER  
 17000603213 4-26-95

(49)

RECIRCULATION VIA HOSE  
 TO THE TANKS AND HOUSES.  
 WATER IN TANK HAS BEEN  
 REUSED OVER LAST 2 YEARS,  
 EXCEPT FOR WATER LOSS  
 EACH CLEAN. 400 BARREL (8400 gal)  
 TANK. WILL ADD 117T GALLONS  
 TO THE TANK.

PAINT SHOP

- PAINT THINNER, PAINT<sub>E</sub> USED  
 IN THE AREA
- EMPTY CANS OF THINNER AND  
 PAINT ARE DISPOSED IN  
 GENERAL TRASH (WASTE  
 MANAGEMENT). PAPER AND  
 TAPE FROM PAINT OPERATIONS  
 ARE ALSO THROWN IN DUMPSTER
- PAINT LINES ARE CLEANED  
 UP BY ACRYLIC LAQUER  
 THINNER AND SPILLED ON  
 THE FLOOR (EVAPORATES).
- UNIFORM SERVICE CLEAR  
 OF THE PAINT RAOS.
- IN OLD BURNER OR FURNACE,  
 ONE DRUM OF UNKNOWN  
 CONTENTS IS LOCATED THERE.  
 TWO DRUMS ARE LOCATED IN

(50)

COBRA  
170R0603215

COBRA  
170R0603215

M. Miller  
4-26-95

(51)

THE BACK. OCH ~~VIEW~~ DID NOT SAY ANYTHING REGARDING THE DRUMS (2 NO. AGO). BATTERIES THAT WERE STORED IN THE SHED WERE RECENTLY <sup>BY</sup> ~~DISCOVERED~~ PICKED UP BY INTER STATE BATTERY. COUPLE OF PAINT CANS (5-GALLONS) WERE ALSO LOCATED HERE. URETHANE FOR RIGID FOAM IS IN ONE OF THE DRUMS

SANDBLASTING AREA

HAROLD OGLE COLLECTED A SAMPLE OF THE SAND AND TESTED IT. REQUEST RESULTS. SANDBLAST INSIDE AND OUTSIDE OF THE TANKS (RUST, PAINT, ETC.). MOSTLY RUST. USE #3 SAND (MEDIUM-GRAIN) 20M. SCREEN USED SAND SO IT CAN BE REUSED.

- 5-GALLON CANS CONTAIN VARIOUS LUBRICATION OILS. COBRA INTER ON INSPECTING THE MATERIAL AND MAY RINSE INTO THE USED OIL TANK. THE 50-GALLON BLACK TANK DRUM HAS UNKNOWN CONTENTS.

26/11

18/11

U-3  
MORNING  
at

(52)

W. Miller  
4-26-95

W. Miller  
4-26-95

COBRA  
170R0603215

M. Miller  
4-26-95

(53)

BLACK

SOME OTHER DRUMS BY  
THE PAINT SHOP ALSO ~~ARE~~  
ARE FULL. MANY CONTAIN  
ANTIFREEZE. USED FOR  
HYDRO TANKERS.

- WHITE TANK BY FUPCINER ISLAND  
~~CONTAIN~~ CONTAINS METHANOL  
(500 GALS). 50-50 MIXTURE  
OF METHANOL AND WATER.
- INSPECT TOTES → ABOUT 75 to  
100 per year. UNICHEM IS A  
GOOD CUSTOMER.
- AIR COMPRESSOR AREA.
  - 5-gallon oil can
  - floor sweep → oil and  
machine solvent. SOLVENTS.  
USUALLY ~~DISPOSED~~ DISPOSED OF  
IN THE DUMPSTER.

TANK MAN.

- WASTES INCLUDE SCRAP IRON  
AND WELDING RODS.
- PARTS WASHER MATERIAL BEFORE  
SAFETY KLEEN WAS DISPOSED OF  
IN THE WASTE OIL TANK. WERE  
USING ABOUT 20-30 GALLONS PER  
YR. UNISOL WAS USED  
\* MIM IN THE PARTS WASHER. UNISOL

(54)

*[Faint, mostly illegible handwritten notes, possibly bleed-through from the reverse side of the page.]*

*M. Butler*

COBRA  
170R0603215

M. Butler  
4-26-95

(55)

ABOUT 100 GALLONS per year  
SAFETY KEEPER will dispose  
OF THE RESIDUAL MATERIAL  
IN THE OLD PARTS WASHER.

SAFETY HAS NOT BEEN BY  
TO ~~THE~~ DISPOSE OF WASTE  
SOLVENTS EACH SAFETY KEEPER  
UNIT IS 0.16 gallon. ONE SK-  
UNIT IS THE PREMIUM SOLVENT  
(REUSEA LOWER). PREMIUM SOLVENT  
USED TO SEE WHETHER IT  
will work LOWER.

1100 BEGIN TO PREPARE FOR SAMPLING.  
GREG PUSHA AND MARK BUTERK  
VIOPOTYPE THE FACILITY AREAS  
OF MOST CONCERN.

*M. Butler*

(56)

COBRA  
170R0603215

COBRA  
170R0603215

4-26-95

(57)

*Steve Elgin*

1148 BEGIN SAMPLING WASH SUMP LIQUIDS; JA & LC COLLECTING SAMPLE COBRA-SUMPL-01 (MS/MSD)

MS/MSD  
SAMPLE

AND -02 (DUPLICATE) FOR TOTAL VOA, TCLP VOA, TCLP ABN, FETSY AND IGNITABILITY; MEDIA

1150

IS A BLACK LIQUID WITH PID READINGS OF 1200 PPM W/ SUMP; SPLIT W/ COBRA

1155  
DUPLIC

1200

END SAMPLING OF LIQUID PHASE WASH SUMP (COBRA-SUMPL-01 & 02)

1200

BEGIN SAMPLING SOLID PHASE

SAMPLE  
MS/MSD

OF WASH SUMP CONTENTS; JA & LC COLLECTING COBRA-SUMPS - 03 (MS/MSD) AND -04

(DUPLICATE) FOR TOTAL VOA, TCLP VOA, TCLP ABN, TCLP DECATS. SPLIT W/ COBRA. PRC PROVIDING SAMPLE JARS FOR SPLITS W/ COBRA MATERIAL IS BLACK SLUDGE, WHICH IS MULTI-PHASED (2)

1215  
DUPLIC

END SAMPLING SUMP SOLIDS, COBRA-SUMPS-03 & -04

*Steve Elgin*

M. Sullivan  
4-26-95

(26)

98:25:17 98:25:17

COBRA  
17020603215

(59)  
4-26-95

Mark Beatty

Wash Bay ~~has~~ 19 INCHES OF  
~~more~~ liquids, <sup>(10)</sup> 56 INCHES OF TOTAL  
\* MATERIAL IN THE SUMP. REQUEST  
CONSTRUCTION DIAGRAM FOR THE  
SUMP.

David Pugh

1240 JA & LC BEGIN COLLECTING  
SAMPLE LIQUID SAMPLE FROM CARBURETOR  
CLEANER TANK IN WASH BAY.  
COLLECTING COBRA-CARBANK-05.  
FOR TOTAL/TCLP VOA, TCLP ABU,  
AND IGNITABILITY; SPLIT w/  
COBRA & PRC PROVIDES SAMPLE JARS.  
MEDIA IS A BROWN LIQUID  
COLLECTING SAMPLE WITH GLASS  
DRUM THIEF (18MM)  
1250 END SAMPLING CARBURETOR  
CLEANER TANK - COBRA-CARBANK-05

M. Beatty 4-26-95

(60)

APR  
1985

COBRA  
1702060215

4-26-95

(61)

M. B. B. 4-26-95

1330

SAMPLE  
TIME

BEGIN SAMPLING RINSE WATER  
TANK FOR TOTAL AND TCLP  
VOAs, AQUEOUS VOLUME. JA  
SAMPLING THROUGH PORT HOLES  
IN TOP OF TANK (VERTICAL  
STORAGE TANK); COLLECTING  
COBRA-WATER TANK-06 (MS/MSD  
FOR AQUEOUS) AND -07 (DUPLIC.)  
MB IS ASSISTING IN SAMPLING.  
TOTAL VOA IN 40-ML GLASS VIALS  
TCLP VOA IN 8-OZ GLASS JARS

1350

DUPLIC  
TIME

END SAMPLING RINSE  
WATER TANK

Mark Butts

1432

LYOLITE COLLINS PHOTOGRAPHED  
THE ACETONE DRUM LOCATED  
IN THE ABANDONED FURNACE SIZED.  
THE DRUM APPEARED TO BE FULL.

1444

LRC PHOTOS THE DRUM LOCATED  
IN FRONT OF THE ABANDONED  
FURNACE SIZED. LIKE THE DRUM

(62)

13200  
L1506455051

COBRA  
170X06032IT

M. Suttler  
4-26-97

(63)

M. Suttler  
4-26-97

LOCATED NEXT TO THE SUMP IN THE WASH BAY, THIS DRUM IS (1) MARKED "PERMANENT ANTIFREEZE" (2) CONTAINS AN OIL-LIKE MATERIAL THAT HAS A STRONG ODOR, AND (3) HAS TWO HOLES DRILLED IN THE SIDES CLOSE TO THE TOP FOR LIFTING BY A SH. TOTAL LEVEL OF OIL IN THIS DRUM IS ABOUT 12 INCHES (SEE PHOTO).

1470

LAC PHOTOGRAPHS THE STAINED SOIL FROM THE LEAKING TANKER TRAILER, WHICH IS LOCATED ABOUT 100 YARDS SOUTH OF THE WASH BAY. THIS TANKER TRAILER WILL OR MAY BE REPAIRED AFTER CLEANING OUT IN THE WASH BAY.

1470

AMARO PROVIDES PAC WITH A COPY OF THE SUMP SYSTEM DRAWINGS (w/ dimensions). - LAC PHOTOGRAPHS A 55-GAL DRUM ALONG THE SOUTH FENCE THAT CONTAINS "UNKNOWN" MATERIAL. DRUM MARKED PERMANENT ANTIFREEZE.

1472

LAC PHOTOGRAPHS THE PILE OF SOIL OR SLUDGE IN THE SOUTHEAST CORNER. SOURCE OF THE SOIL OR SLUDGE IS UNKNOWN.

(64)

COBSRA  
17020603215

DRUMS  
ANTIFREEZE

COBSRA  
17020603215

M. Butler  
4-26-95

(65)

M. Butler  
4-26-95

- 1456 LRC PHOTOS THE CONCRETE PAD (MCS STANDING ON) <sup>(M)</sup> ~~WHERE~~ ON WHICH COBSRA WORKS ON ITS RIGS. DRAINAGE FROM THE PAD FLOWS SOUTH.
- 1458 LRC PHOTOS THE FIVE DRUMS ALONG THE NORTHERN FENCE. DRUMS IDENTIFIED AS PERMANENT ANTIFREEZE. FACILITY PERSONNEL STATED THAT THE DRUMS CONTAIN AN ANTIFREEZE/WATER MIXTURE.
- 1502 LRC PHOTO GRAPHS THE ~~STATION~~ ASSORTMENT MATERIALS NEXT TO THE AIR COMPRESSOR.
- 1511 STA MEASURES DEPTH TO LIQUID IN THE WASTE OIL TANK: 15 INCHES. TANK IS ABOUT 36 INCHES HIGH, 7 feet long, and 6 feet wide.
- 1527 THE CARBURATOR TANK IS ABOUT 3 feet HIGH, 2.7 feet wide, and 3.7 feet long. TWENTY (20) INCHES OF MATERIAL IS IN THE TANK.
- 1528 Level of oil in the drums in the wash area
- |   |   |   |   |   |                                       |
|---|---|---|---|---|---------------------------------------|
| ① | ② | ③ | ④ | ⑤ | (TOTAL CAPACITY OF DRUMS IS 55 GALS.) |
|   |   |   | ⑥ |   |                                       |
1. 24 inches                      4. 22 inches  
 2. 24 "                            5. 11 inches  
 3. 27 "                            6. 30.5 inches
- (INSIDE DIA OF DRUMS ABOUT 22.5"  
 HEIGHT OF DRUMS ABOUT 54 inches)

(66)

LABORATORY  
NO. 1000

ADSORBANT  
DISTILLATION

COBRA.  
170R0603215

M. Butler  
4-26-95

(67)

THE COLLECTION SUMP IN THE  
WASH BAY CONTAINS ABOUT  
1" DE SLUDGE WIDTH OF SUMP  
IS ABOUT 14" LENGTH OF SUMP  
SHOULD BE ON THE DRAWING. IT  
IS ABOUT 29 FEET LONG.

1530 BEGAN SAMPLING WASTE OIL TANK.  
TOTAL VOA, TELP VOA, SAMPLES  
WERE JTA AND LRC. PRC USES  
A CABLE TO COLLECT THE SAMPLES.

1540 COMPLETED COLLECTING SAMPLE 08 AT  
WASTE OIL TANK.

1555 STARTED COLLECTING SAMPLES 09 AND 10  
OF THE ADSORBANT MATERIAL NEXT  
TO THE AIR COMPRESSOR. SAMPLE 10  
IS A DUPLICATE OF 09. ANALYSES  
INCLUDE TOTAL VOA AND TELP VOA.

1605 COMPLETED SAMPLING ADSORBANT  
MATERIAL (SAMPLES 09 AND 10).

1610 MRS COLLECTED A FIELD BLANK W/  
DEIONIZED WATER. COBRA-FB-11  
IS THE SAMPLE ID. "COBRA-TB-12"  
IS A TRIP BLANK. NO EQUIPMENT  
RINSATE WAS NECESSARY FOR THE  
ANOUS SAMPLE.

1658 OPENED UP THE DRAIN (BLACK 55-GALLON)  
NEXT TO THE HORIZONTAL DIESEL TANKS.

4-26-95

M. Butler

(68)

215060321T

215060321T

COSRA  
170R060321T

M. Butler  
4-26-95

(69)

M. Butler 4-26-95

01

FACILITY PERSONNEL INDICATED THAT IT MAY CONTAIN OIL, BUT WERE NOT SURE. DRUM WAS ABOUT HALF FULL AND CONTAINED A CLEAR LIQUID. HNU ON MICRO TIP READINGS APPROXIMATED 500 PPM. PH WAS NEUTRAL.

(700) INSPECTED THE ACETONE ~~TRUCK~~ <sup>DRUM</sup> IN THE OLD FURNACE SHED. MICRO TIP READING WAS ABOUT 10 PPM. MATERIAL IN THE DRUM WAS A DARK BROWN LIQUID. PH APPEARED TO BE NEUTRAL. MATERIAL WAS NOT ACETONE.

(715) CHECKED OUT THREE <sup>55-GAL</sup> DRUMS ALONG THE EAST FENCE IN FRONT OF OLD FURNACE SHED. ALL THREE DRUMS HAD HOLES IN THE TOP OF THE DRUMS. THE DRUMS HAD 5, 2.5, AND 2.0 INCHES OF MATERIAL w/ MICRO TIP READINGS IN EXCESS OF 600 PPM IN EACH.

(725) CHECKED OUT THE DRUMS BY THE EAST FENCE. PHOTOGRAPHED THESE "PERMANENT ANTIFREEZE DRUMS EARLIER, ONE DRUM COULD NOT BE OPENED, AND ONE DRUM WAS MARKED "KEROSENE" ALTHOUGH <sup>(it)</sup> FACILITY PERSONNEL INDICATED THAT THE KEROSENE DRUM HAD ANTIFREEZE

(70)

COBRA  
170R060321T

M. Buttle  
4-26-95

COBRA  
170R060321T

M. Buttle  
4-26-95

(71)

(on tape), THE DROW HAD VERY HIGH MICRO TIP READINGS, INDICATING THAT THE DROW DID NOT CONTAIN ANTI FREEZE.

1700 MDS AND JTA GO <sup>(MS)</sup> FEET TO DROP OFF MUCOUS AND SOIL SAMPLES.

1800 MDS AND JTA GO BACK INTO THE FACILITY TO MEASURE THE DIMENSION OF THE WASH DRY SUMP. THE SUMP HAD 56" OF MATERIAL. THE SLUDGE MADE UP 37 INCHES OF THE 56" AND 19" WAS LIQUID. THE SUMP HAD ABOUT 8 INCHES OF FREEBOARD. THE SUMP WAS 52 INCHES WIDE AND 7.5 FEET LONG. AFTER SUBTRACTING THE WIDTH OF THE WEIR (ABOUT 4"), THE LENGTH OF THE SUMP COULD BE REDUCED TO 7 FEET.

M. Buttle  
4-26-95

M. Buttle

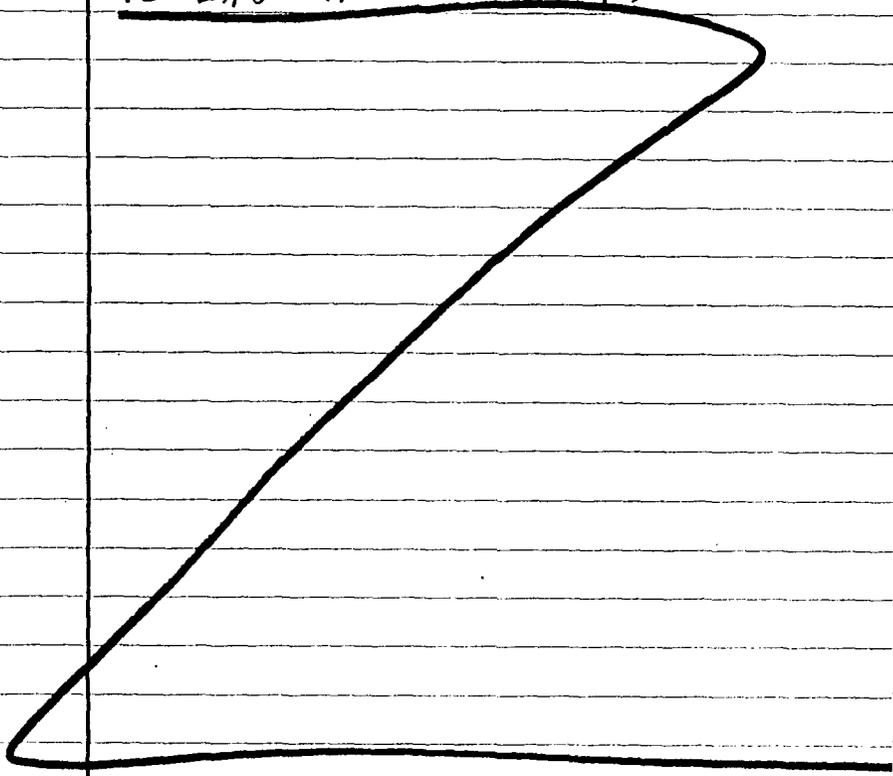
COBRA

1700660525

7/5/95

(12)

1035 LV CALLS E & E  
ENTERPRISES IN BROWNFIELD,  
TEXAS (806-637-9336)  
TO DETERMINE WHAT THEY  
DO WITH COBRA'S USED  
OIL. ACCORDING TO E &  
E, THEY RECYCLE THE  
USED OIL AND SELL THE  
RECYCLED OIL TO  
ASPHALT FORMULATORS  
AS AN INGREDIENT.



**APPENDIX G**  
**CHAIN-OF-CUSTODY FORMS**  
**(Four Sheets)**



# PDP Analytical Services

1680 Lake Front Circle, Suite B • The Woodlands, Texas 77380 • Phone (713) 363-2233 • Fax (713) 298-5784

## Chain of Custody Record

SHEET 1 OF 2

Client Name / Address: **PRC ENVIRONMENTAL MGT., INC.**  
**350 N. ST. PAUL ST., SUITE 2600**  
**DALLAS, TX 75201**  
**(214) 754-8765**

Send Report to: **MARK BUTLER**  
**C/O PRC**

Project Number: **170R060325LA** Project Name: **COBRA INDUSTRIES, INC.**  
**HOBBS, NM**

Sample(s) (Signature): *[Signature]* P.O. Number: **Mark Butler**

Sta. No.	Date	Time	Comp.	Grab	Station Location	Number of Containers	Matrix	TOTAL VOA	TCLP VOA	TCLP ABN	KNIT METALS	SPECIFIC GRAVITY	Remarks
01	4/26/95	1150		X	COBRA-SUMPL-01	11	LIQUID WASTE	X	X	X	X	X	MS/MSD
02		1155		X	COBRA-SUMPL-02	5	LIQUID WASTE	X	X	X	X	X	
03		1200		X	COBRA-SUMPS-03	12	SOLID WASTE	X	X	X	X	X	MS/MSD
04		1215		X	COBRA-SUMPS-04	6	SOLID WASTE	X	X	X	X	X	
05		1240		X	COBRA-CARB TANK-05	6	LIQUID WASTE	X	X	X	X	X	
08		1530		X	COBRA-OIL TANK-08	4	LIQUID WASTE	X	X	X	X	X	

Relinquished by (Signature): <i>[Signature]</i>	Date / Time: <b>4/27/95 1200</b>	Received by (Signature): <b>FED EX</b>	Date / Time:	Remarks: <b>FED EX</b> <b>Air Bill # 7526369550</b>
Relinquished by (Signature):	Date / Time:	Received by (Signature):	Date / Time:	
Relinquished by (Signature):	Date / Time:	Received for Laboratory by (Signature):	Date / Time:	

Method of Shipment: \_\_\_\_\_ PDP Quote Number: \_\_\_\_\_



# PDP Analytical Services

1680 Lake Front Circle, Suite B ■ The Woodlands, Texas 77380 ■ Phone (713) 363-2233 ■ Fax (713) 298-5784

## Chain of Custody Record

SHEET 2 OF 2

Client Name / Address: PRC ENVR. MGT., INC.  
350 N. ST. PAUL ST., SUITE 2600  
DALLAS, TX 75201 (214) 754-8765

Send Report to: MARK BUTLER

Project Number: 170R0603215 LA Project Name: COBRA INDUSTRIES, INC.  
1-HOBBS, NM

Samplers (Signature): [Signatures] P.O. Number: \_\_\_\_\_

Sta. No.	Date	Time	Comp.	Grab	Station Location	Number of Containers	Matrix	TOTAL VOA	TCLP VOA	Remarks
06	4/26/95	1330		X	COBRA-WATERTANK-06	15	WATER	X	X	MS/MSD
07		1350		X	COBRA-WATERTANK-07	5	WATER	X	X	
09		1555		X	COBRA-SOIL-09	8	SOIL	X	X	MS/MSD
10		1605		X	COBRA-SOIL-10	4	SOIL	X	X	
11		1610		X	COBRA-FB-11	3	WATER	X	X	FIELD BLANK
12				X	COBRA-TB-12	3	WATER	X	X	TRIP BLANK
										NOTE: AGUEOUS VOAS ARE NOT PRESERVED; PLEASE ANALYZE W/ 7-DAY HOLDING PERIOD

Relinquished by (Signature): <u>[Signature]</u>	Date/Time: <u>4/26/95 1800</u>	Received by (Signature): <u>FED EX</u>	Date/Time: _____	Remarks: <u>FEDEX AIRBILL NO.</u> <u>3911763133</u>
Relinquished by (Signature): _____	Date/Time: _____	Received by (Signature): _____	Date/Time: _____	
Relinquished by (Signature): _____	Date/Time: _____	Received for Laboratory by (Signature): _____	Date/Time: _____	

Method of Shipment: \_\_\_\_\_ PDP Quote Number: \_\_\_\_\_

7526369550

SENDER'S COPY

Date  
4/27/95

Your Name (Please Print) **Mark & Butler** Your Phone Number (Very Important) \_\_\_\_\_ To (Recipient's Name) Please Print **Mark Bourgeois** Recipient's Phone Number (Very Important) \_\_\_\_\_  
 Company **PPC** Department/Floor No. \_\_\_\_\_ Company \_\_\_\_\_ Department/Floor No. \_\_\_\_\_  
 Street Address \_\_\_\_\_ Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.)  
**1680 Lake Front Circle Suite B**  
 City **The Woodlands TX** State \_\_\_\_\_ ZIP Required **77380**

YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) **170R0603215LA**  
 IF HOLD FOR PICK-UP, Print FEDEX Address Here (Not available at all locations)  
 Street Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ ZIP Required \_\_\_\_\_  
 Exp. Date \_\_\_\_\_

**SERVICES (Check only one box)** **DELIVERY AND SPECIAL HANDLING (Check services required)** **PACKAGES** **WEIGHT** **YOUR DECLARED VALUE**

**11**  Bill Sender **51**  Bill Recipient's FedEx Acct. No. **3**  Bill 3rd Party FedEx Acct. No. **4**  Bill Credit Card  
 Cash/Check  Acct. Credit Card No.  Acct. No. Reg'd.  Fill in Account Number below  Fill in Account Number below (req'd.)  Fill in Credit Card No. below (req'd.)  
 Exp. Date \_\_\_\_\_

**5**  **HOLD FOR PICK-UP** (Fill in Box #)  **WEEKDAY**  **SATURDAY**  
**6**  **DELIVER**  **WEEKDAY**  **SATURDAY** (Extra charges not available to all locations)  
 **7** **DANGEROUS GOODS** (Extra charges)  
 **8** **DRY ICE** (Dangerous Goods Shipper's Declaration not required)  
 **9** **OTHER SPECIAL SERVICE**  
 **12** **HOLIDAY DELIVERY** (Extra charges)

Total Total Total  
 5 161

**SERVICE CONDITIONS, DECLARED VALUE AND LIMIT OF LIABILITY**  
 Use of this airbill constitutes your agreement to the service conditions in our current Service Guide, available upon request. See back of sender's copy of this airbill for information. Service conditions may vary for Government Overnight Service. See U.S. Government Service Guide for details.  
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 In the event of untimely delivery, Federal Express will at your request and with some limitations refund all transportation charges paid. See Service Guide for further information.

REVISION DATE 8/92  
 FORMAT 3145 MBFAN 2/93  
**145**

SIGNATURE RELEASE UNAVAILABLE

7526369550 AIRBILL NUMBER  
 CHECK ONE  49 CFR  IATA/ICAO (TYPE OR PRINT)

DANGEROUS GOODS IDENTIFICATION		UN OR ID NO	SUBSIDIARY RISK	QUANTITY AND TYPE OF PACKING	PACKING INST	AUTHORIZATION
PROPER SHIPPING NAME	CLASS OR DIVISION	UN3082				
ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, NOS						

ADDITIONAL HANDLING INFORMATION

TRANSPORT DETAILS	THIS SHIPMENT IS WITHIN THE LIMITATIONS PRESCRIBED FOR	<input checked="" type="checkbox"/> PASSENGER AIRCRAFT	<input type="checkbox"/> CARGO AIRCRAFT ONLY	(DELETE-NONAPPLICABLE)
REPORT OF DEPARTURE	AIRPORT OF DESTINATION	<input checked="" type="checkbox"/> NON-RADIOACTIVE	<input type="checkbox"/> RADIOACTIVE	(DELETE-NONAPPLICABLE)

LAURENCE NM HOUSTON, TX

ACCEPTABLE FOR PASSENGER AIRCRAFT, THIS SHIPMENT CONTAINS RADIOACTIVE MATERIAL INTENDED FOR USE IN, OR INCIDENT TO, RESEARCH, MEDICAL DIAGNOSIS OR TREATMENT.

I HEREBY DECLARE THAT THE CONTENTS OF THIS CONSIGNMENT ARE FULLY AND ACCURATELY DESCRIBED ABOVE BY PROPER SHIPPING NAME AND ARE CLASSIFIED, PACKED, MARKED, AND LABELED, AND ARE IN ALL RESPECTS IN PROPER CONDITION FOR TRANSPORT BY AIR ACCORDING TO THE APPLICABLE INTERNATIONAL AND NATIONAL GOVERNMENT REGULATIONS.

NAME AND TITLE OF SHIPPER **UIS VEGA ENVR SCIENTIST PPC** PLACE AND DATE **LAURENCE NM 4/27/95**  
 REFERENCE TELEPHONE NUMBER \_\_\_\_\_ SIGNATURE OF SHIPPER \_\_\_\_\_  
 SEE WARNING ON BACK



USE THIS AIRBILL FOR SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII.  
USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO AND ALL NON U.S. LOCATIONS.  
QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL  
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3911763133

3911763133

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SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER 1307-4931-4		Pay 4/26/95	
From (Your Name) Please Print <b>MARK BUTLER</b>		Your Phone Number (Very Important) 814-734-8765	
Company <b>PRC</b>		Department/Floor No.	
Street Address <b>390 N. ST. PAUL STE 2600</b>		To (Recipient's Name) Please Print <b>MARK BOURGEOIS</b>	
City <b>DALLAS</b>		State <b>TX</b>	
ZIP Required <b>75201</b>		Recipient's Phone Number (Very Important) <b>(15) 303 3377</b>	
Company <b>PDP ANALYTICAL</b>		Department/Floor No.	
Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) <b>1600 LAKE LINDA, SUITE 1700</b>		City <b>THE WOODLANDS</b>	
State <b>TX</b>		ZIP Required <b>77380</b>	
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on Invoice.) <b>170R0603215LA</b>			
IF HOLD AT FEDEX LOCATION, Print FEDEX Address Here Street Address		City	
State		ZIP Required	
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Total		Use of this airbill constitutes your agreement to the service conditions in our current Service Guide, available upon request. See back of sender's copy of this airbill for information. Service conditions may vary for Government Overnight Service. See U.S. Government Service Guide for details. We will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, and document your actual loss for a timely claim. Limitations found in the current Federal Express Service Guide apply. Your right to recover from Federal Express for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the declared value specified to the left. Recovery cannot exceed actual documented loss. The maximum Declared Value for FedEx Letter and FedEx Pak packages is \$500. In the event of untimely delivery, Federal Express will at your request and with some limitations refund all transportation charges paid. See Service Guide for further information. Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.	
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**APPENDIX H**  
**WASTE QUANTITY AND VOLUME**  
**(Three Sheets)**

**TABLE H-1**  
**WASTE QUANTITY**

Waste Unit	Waste Volume <sup>a</sup> (ft <sup>3</sup> )	Specific Gravity of Waste <sup>b</sup>	Weight of Waste <sup>c</sup> (kg)
Wash bay sump (Liquid)	48.2	0.834	1,135
Wash bay sump (Sludge)	93.3	1.28	3,372
Wash bay drain (Sludge)	2.7	1.28	98
Wash bay drums (6) (Liquid)	30.6	0.834	720
Carburetor cleaner tank (Liquid)	17	0.980	470
Used oil storage tank (Liquid)	73.5	0.818	1,698

Notes:

ft<sup>3</sup> = Cubic foot (feet)

kg = Kilogram(s)

m<sup>3</sup> = Cubic meter(s)

<sup>a</sup> Waste volume is based on the calculations shown on page H-2.

<sup>b</sup> Specific gravity was determined by the laboratory (Attachment A).

<sup>c</sup> Weight (kg) = (Waste volume [ft<sup>3</sup>]) x (0.02832 m<sup>3</sup>/ft<sup>3</sup>) x (density of water at 25°C [997 Kg/m<sup>3</sup>]) x (specific gravity).

## CALCULATIONS OF WASTE VOLUME

(All calculations were determined in the field and recorded in the inspection notes [Appendix F])

### Wash Bay Sump

$$VL = L \times W \times H \quad (H-1)$$

where

$$\begin{aligned} VL &= \text{volume of liquid waste (cubic feet [ft}^3\text{])} \\ L &= \text{length (feet)} \\ W &= \text{width (feet)} \\ H &= \text{height (feet)} \end{aligned}$$

---

$$\text{Calculation: } VL = 7 \times 4.3 \times 1.6 = 48.2 \text{ ft}^3 \quad (H-1)$$

$$VS = L \times W \times H \quad (H-2)$$

where

$$VS = \text{volume of sludge (ft}^3\text{)}$$

---

$$\text{Calculation: } VS = 7 \times 4.3 \times 3.1 = 93.3 \text{ ft}^3$$

$$VDS = L \times W \times H \quad (H-3)$$

where

$$VDS = \text{volume of wash bay drain sludge (ft}^3\text{)}$$

---

$$\text{Calculation: } VDS = 28 \times 1.2 \times 0.08 = 2.7 \text{ ft}^3 \quad (H-3)$$

$$VLD = \pi \times R^2 \times (H_1 + H_2 + H_3 + H_4 + H_5 + H_6) \quad (H-4)$$

where

$$\begin{aligned} VLD &= \text{volume of liquid waste in six wash bay drums (ft}^3\text{)} \\ \pi &= 3.141592654 \\ R &= \text{radius of one drum (feet)} \\ H_1 \dots &= \text{height of liquid waste in each drum (1 through 6) (feet)} \end{aligned}$$

---

$$\text{Calculation: } VLD = \pi \times (0.94)^2 \times (2 + 2 + 1.75 + 1.83 + 0.92 + 2.54) = 30.6 \text{ ft}^3 \quad (H-4)$$

Carburetor Cleaner Tank

$$VL = L \times W \times H \quad (H-5)$$

Calculation:  $VL = 3.7 \times 2.7 \times 1.7 = 17 \text{ ft}^3 \quad (H-5)$

Used Oil Storage Tank

$$VL = L \times W \times H \quad (H-6)$$

Calculation:  $VL = 7 \times 6 \times 1.75 = 73.5 \text{ ft}^3 \quad (H-6)$

**ATTACHMENT A**  
**PRC ANALYTICAL DATA SUMMARY SHEETS**  
**(45 Sheets)**

Client: PRC ENVIRONMENTAL

Project Name: COBRA INDUSTRIES,  
INC.

Episode No.:2925

Project No.: 170R0603215LA

### CASE NARRATIVE

Two soil/solid and four liquid/water samples were received for analysis on 04/28/95 and on 04/27/95. Results for solid/soil and liquid/water samples are reported on a wet weight basis.

All batch quality control (QC) results (Duplicates, Matrix Spikes, Matrix Spike Duplicates) are included in this data package. Batch QC may or may not have been performed on your samples.

#### SAMPLE RECEIPT AND LOG-IN:

No problems were encountered.

#### TCLP VOLATILES:

Samples "COBRA-SUMPL-01", "COBRA-SUMPL-02" and "COBRA-OILTANK-08" required dilutions. Due to the nature of the samples, no further analyses could be performed.

#### TCLP SEMIVOLATILES:

They were extracted beyond 14DHT. Some samples were analyzed by waste dilution technique. Sample "COBRA-CARBTANK-05" required further dilution. Both analyses are reported.

#### TCLP METALS:

A trace level of barium was noted in the TCLP extraction.

#### TOTAL VOLATILES:

The 2925.05MS & MSD was outside the holding time.

#### GENERAL CHEMISTRY:

No problems were encountered.

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PDP ANALYTICAL SERVICES  
SAMPLE LOG-IN SHEET

LOGGED BY: JENNIFER CUSHMAN

DATE OF PHYSICAL LOG-IN: 4/27/95 & 4/28/95

Page 1 of 1

Episode #: 2925  
Client ID: PRC  
Project ID: COBRA INDUSTRIES, INC.  
Project #: 178R0683215LA  
PO Number:  
Courier/No.: FED-EX/7526369550

DATE OF COMPUTER LOG-IN: 28-Apr-95  
COMPUTER LOG-IN BY: JC  
COMPUTER ID: OA

Lab ID	Client ID	Testing Required	No. Cont.	Sample Matrix	Date Sampled	Date Received	Date Due	Remarks
2925.01	COBRA-SUMPL-01-	TOTAL VOA TCLP VOA TCLP SVOA IGNITE SPECIFIC GRAVITY (SUBBED)	11	LIQUID	4/26/95	4/28/95	5/29/95	MS/MSD
2925.02	COBRA-SUMPL-02	TOTAL VOA TCLP VOA TCLP SVOA	5	LIQUID	4/26/95	4/28/95		
2925.03	COBRA-SUMPS-03	TOTAL VOA TCLP VOA TCLP SVOA TCLP METALS SPECIFIC GRAVITY	12	SOLID	4/26/95	4/28/95		MS/MSD
2925.04	COBRA-SUMPS-04	TOTAL VOA TCLP VOA TCLP SVOA TCLP METALS	6	SOLID	4/26/95	4/28/95		
2925.05	COBRA-CARBANK-05	TOTAL VOA TCLP VOA TCLP SVOA IGNITE SPECIFIC GRAVITY	6	LIQUID	4/26/95	4/28/95		
2925.06	COBRA-DILTANK-06	TOTAL VOA TCLP VOA SPECIFIC GRAVITY	5	LIQUID	4/26/95	4/28/95		
2925.07	COBRA-WATERTANK-07	TOTAL VOA TCLP VOA	15	WATER	4/26/95	4/27/95		MS/MSD
2925.08	COBRA-WATERTANK-08	SAME AS ABOVE	5	WATER	4/26/95	4/27/95		
2925.09	COBRA-SOIL-09	SAME AS ABOVE	8	SOIL	4/26/95	4/27/95		MS/MSD
2925.10	COBRA-SOIL-10	SAME AS ABOVE	4	SOIL	4/26/95	4/27/95		
2925.11	COBRA-FB-11	TOTAL VOA	3	WATER	4/26/95	4/27/95		
2925.12	COBRA-TB-12	TOTAL VOA	3	WATER	NA	4/27/95		

MS/MSD REQUESTED BY CLIENT

- NOTE: 1. AQUEOUS VOAs ARE NOT PRESERVED  
2. THESE SAMPLES ARE HIDEOUS!!!!  
3. SAMPLES 01-06 LOCATED IN EXTRACTIONS  
SPECIFIC GRAVITY SUBBED TO NDCR, DALLAS

Weight basis:  wet  dry  
Deliverables:  norm  CLP-like  CLP  
 raw data  electronic

APPROVED BY/DATE: *Jennifer Cushman*  
4/28/95

SEND REPORT TO: MARK BUTLER

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*TCLP VOLATILES*

000009

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SAMPL-01	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.01	Date Received: 04/28/95
Project No.: 170R0603215LA	Report No.: 85883	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: LIQUID	Dilution: 100000.3	Method Ref.: SW846-3240
Multipling Factor: 100000.3	Date TCLP Extracted: 05/08/95	GC/MS File ID: 85883
3.0 ml	Date Analyzed: 05/19/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	500000	ND
1,2-Dichloroethane	500	500000	ND
2-Butanone	200000	1000000	ND
Benzene	500	500000	ND
Carbon tetrachloride	500	500000	ND
Chlorobenzene	100000	500000	ND
Chloroform	5000	500000	ND
Tetrachloroethene	700	500000	ND
Trichloroethene	500	500000	ND
Vinylchloride	100	1000000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	94
Toluene-d8	50	(88-110)	90
Bromofluorobenzene	50	(86-115)	99

Method Blank ID: 2920V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA
TCLP Blank ID: 2921V.FBLK1	TCLP LCS ID: 2920V.WLCS1	TCLP MS ID: 2925.01MS	TCLP MSD ID: NA      TCLP DUP ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SUMPL-82	Date Sampled: 84/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.82	Date Received: 84/28/95
Project No.: 170R060321SLA	Report No.: 85079	Date Reported: 85/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: LIQUID	Dilution: 100000.0	Method Ref.: SW846-8240
Multiplying Factor: 500000.0	Date TCLP Extracted: 85/08/95	GC/MS File ID: 85079
5.0 ml	Date Analyzed: 85/19/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	2500000	ND
1,2-Dichloroethane	500	2500000	ND
2-Butanone	200000	5000000	ND
Benzene	500	2500000	ND
Carbon tetrachloride	500	2500000	ND
Chlorobenzene	100000	2500000	ND
Chloroform	5000	2500000	ND
Tetrachloroethene	700	2500000	ND
Trichloroethene	500	2500000	ND
Vinylchloride	200	5000000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	GC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	101
Toluene-d8	50	(88-110)	96
Bromofluorobenzene	50	(86-115)	104

Method Blank ID: 2928V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2921V.FBLK1	TCLP LCS ID: 2928V.WLCS1	TCLP MS ID: 2925.81MS	TCLP MSD ID: NA	TCLP DUP ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

PDP ANALYTICAL SERVICES  
1680 Lake Front Circle, Ste. 3; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SUMPS-03	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.03	Date Received: 04/28/95
Project No.: 170R0603215LA	Report No.: 85069	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: SOLID	Dilution: 5.0	Method Ref.: SW846-8240
Multiplying Factor: 5.0	Date TCLP Extracted: 05/08/95	GC/MS File ID: 95069
5.0 ml	Date Analyzed: 05/18/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	222
Benzene	500	25	539
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(75-114)	97
Toluene-d8	50	(88-118)	89
Bromofluorobenzene	50	(86-115)	97

Method Blank ID: 2920V.WBLK4	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2921V.TBLK1	TCLP LCS ID: 2920V.WLCS4	TCLP MS ID: 2925.03MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

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LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SUMPS-34	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.84	Date Received: 04/28/95
Project No.: 170R0603215LA	Report No.: 85887	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: SOLID	Dilution: 5.3	Method Ref.: SW846-3240
Multiplying Factor: 5.3	Date TCLP Extract: 05/08/95	GC/MS File ID: 85887
5.3 ml	Date Analyzed: 05/19/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	208
Benzene	500	25	632
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	76
Toluene-d8	50	(88-110)	89
Bromofluorobenzene	50	(86-115)	99

Method Blank ID: 2920V.WBLX2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2921V.FBLX1	TCLP LCS ID: 2920V.WLCS1	TCLP MS ID: 2925.83MS	TCLP MSD ID: NA	TCLP DUP ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-CARBTANK-85	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.85	Date Received: 04/28/95
Project No.: 170R060321SLA	Report No.: 85080	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: LIQUID	Dilution: 1.0	Method Ref.: SW846-8240
Multipling Factor: 5.0	Date TCLP Extracted: 05/08/95	GC/MS File ID: 85080
5.3 xl	Date Analyzed: 05/19/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
Butanone	200000	50	ND
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Trichloroethylene	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	98
Toluene-d8	50	(88-110)	91
Bromofluorobenzene	50	(86-115)	101

Method Blank ID: 2920V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2921V.FBLK1	TCLP LCS ID: 2920V.WLCS1	TCLP MS ID: 2925.83MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-OILTANK-88	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.06	Date Received: 04/28/95
Project No.: 170R0603215LA	Report No.: 85133	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: LIQUID	Dilution: 50000.0	Method Ref.: SW846-8240
Multiplying Factor: 5.0	Date TCLP Extracted: 05/08/95	GC/MS File: 185133
5.0 ml	Date Analyzed: 05/23/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
n-Butanone	200000	50	ND
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(75-114)	101
Toluene-d8	50	(88-110)	102
Bromofluorobenzene	50	(86-115)	106

Method Blank ID: 2925V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2925V.F9LKL	TCLP LCS ID: 2925V.WLCS2	TCLP MS ID: 2925.83MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-WATERTANK-86 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. POP Sample ID: 2925.87 Date Received: 04/27/95  
 Project No.: 170R0603215LA Report No.: 85129 Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: WATER Dilution: 5.3 Method Ref.: SW846-8240  
 Multiplying Factor: 5.3 Date TCLP Extracted: 05/08/95 GC/MS File ID: 85129  
 5.3 ml Date Analyzed: 05/23/95 Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	ND
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	GC Levels (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	101
Toluene-d8	50	(88-118)	100
Bromofluorobenzene	50	(86-115)	106

Method Blank ID: 2925V.WBLK2 LCS ID: NA MS ID: NA MSD ID: NA DUP ID: NA  
 TCLP Blank ID: 2925V.FBLK1 TCLP LCS ID: 2925V.WLCS2 TCLP MS ID: 2925.87MS TCLP MSD ID: NA TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-WATERTANK-07	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.08	Date Received: 04/27/95
Project No.: 178R0603215LA	Report No.: 85131	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: WATER	Dilution: 1.0	Method Ref.: SW846-8240
Multiplying Factor: 1.0	Date TCLP Extracted: 05/08/95	GC/MS File ID: 85131
5.0 ml	Date Analyzed: 05/23/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	5	ND
1,2-Dichloroethane	500	5	ND
Butanone	200000	10	ND
Benzene	500	5	ND
Carbon tetrachloride	500	5	ND
Chlorobenzene	100000	5	ND
Chloroform	5000	5	ND
Tetrachloroethene	700	5	ND
Trichloroethene	500	5	ND
Vinylchloride	200	10	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	94
Toluene-d8	50	(88-110)	92
Bromofluorobenzene	50	(86-115)	96

Method Blank ID: 2925V.WBLX2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2925V.FBLX1	TCLP LCS ID: 2925V.WLCS2	TCLP MS ID: 2925.07MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

000074

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SOIL-89	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.89	Date Received: 04/27/95
Project No.: 170R0603215LA	Report No.: 05125	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: SOIL	Dilution: 5.0	Method Ref.: SW846-8240
Multiplying Factor: 5.3	Date TCLP Extracted: 05/08/95	GC/MS File ID: 05125
5.3 ml	Date Analyzed: 05/23/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	502
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	101
Toluene-d8	50	(80-110)	102
Bromofluorobenzene	50	(86-115)	106

Method Blank ID: 2925V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2925V.TBLK1	TCLP LCS ID: 2925V.WLCS2	TCLP MS ID: 2925.89MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

PDP ANALYTICAL SERVICES  
1688 Lake Front Circle, Ste. B; The Woodlands, TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL	Client Sample ID: COBRA-SOIL-18	Date Sampled: 04/26/95
Project Name: COBRA INDUSTRIES, INC.	PDP Sample ID: 2925.18	Date Received: 04/27/95
Project No.: 170R060321SLA	Report No.: 35126	Date Reported: 05/24/95

GC/MS-TCLP VOLATILE ORGANICS (DATA SHEET)

Sample Matrix: SOIL	Dilution: 5.0	Method Ref.: SW846-8240
Multiplying Factor: 5.0	Date TCLP Extracted: 05/08/95	GC/MS File ID: 05126
5.0 ml	Date Analyzed: 05/23/95	Analyst: JW

COMPOUND	REGULATORY LEVEL (ug/L) †	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,1-Dichloroethene	700	25	ND
1,2-Dichloroethane	500	25	ND
2-Butanone	200000	50	196
Benzene	500	25	ND
Carbon tetrachloride	500	25	ND
Chlorobenzene	100000	25	ND
Chloroform	5000	25	ND
Tetrachloroethene	700	25	ND
Trichloroethene	500	25	ND
Vinylchloride	200	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
1,2-Dichloroethane-d4	50	(76-114)	100
Toluene-d8	50	(88-110)	98
Bromofluorobenzene	50	(86-115)	104

Method Blank ID: 2925V.WBLK2	LCS ID: NA	MS ID: NA	MSD ID: NA	DUP ID: NA
TCLP Blank ID: 2925V.TBLK1	TCLP LCS ID: 2925V.WLCS2	TCLP MS ID: 2925.09MS	TCLP MSD ID: NA	TCLP DUP ID: NA

† = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

000085

*TCLP SEMIVOLATILES*

000351

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPL-01 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.01 Date Received: 04/28/95  
 Project No.: 170R0603215LA Report No.: A6874 Date Reported: 05/23/95

GC/MS-TCLP SEMIVOLATILES (DATA SHEET)

Sample Matrix: LIQUID Dilution: 2.0 Method Ref.: SW846-8270  
 Multiplying Factor: 20000.0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6874  
 Sample Volume: 1 ml Date Extracted: 05/19/95 Analyst: RRP  
 Extract Volume: 10.0 ml Date Analyzed: 05/22/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	200000	ND
2,4,5-Trichlorophenol	400000	200000	ND
2,4,6-Trichlorophenol	2000	200000	ND
2,4-Dinitrotoluene	130	200000	ND
2-Methylphenol	200000	200000	ND
3+4-Methylphenols	200000	200000	ND
Hexachlorobenzene	130	200000	ND
Hexachlorobutadiene	500	200000	ND
Hexachloroethane	3000	200000	ND
Nitrobenzene	2000	200000	ND
Pentachlorophenol	100000	500000	ND
Pyridine	5000	200000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	100000	(35-114)	63.0	Phenol-d5	150000	(10-94)	5.0
2-Fluorobiphenyl	100000	(43-116)	114.0	2-Fluorophenol	150000	(21-100)	102.0
Terphenyl-d14	100000	(33-141)	115.0	2,4,6-Tribromophenol	150000	(10-123)	80.0

Method Blank ID: 2921S.MBLK2 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.FBLK1 TCLP LCS ID: 2921S.TLCS2 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

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POP ANALYTICAL SERVICES  
 1680 Lake Front Circle, Suite 8, The Woodlands, TX 77380; (713) 363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPL-02 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.02 Date Received: 04/28/95  
 Project No.: 170R0603215LA Report No.: A6876 Date Reported: 05/23/95

GC/MS-TCLP SEMIVOLATILES (DATA SHEET)

Sample Matrix: LIQUID Dilution: 2.0 Method Ref.: SW846-8270  
 Multiplying Factor: 20000.0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6876  
 Sample Volume: 1 ml Date Extracted: 05/19/95 Analyst: RRP  
 Extract Volume: 10.0 ml Date Analyzed: 05/22/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	200000	ND
2,4,5-Trichlorophenol	400000	200000	ND
2,4,6-Trichlorophenol	2000	200000	ND
2,4-Dinitratoluene	130	200000	ND
2-Methylphenol	200000	200000	ND
3+4-Methylphenols	200000	200000	ND
Hexachlorobenzene	130	200000	ND
Hexachlorobutadiene	500	200000	ND
Hexachloroethane	3000	200000	ND
Nitrobenzene	2000	200000	ND
Pentachlorophenol	100000	500000	ND
Pyridine	5000	200000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	100000	(35-114)	92.0	Phenol-d5	150000	(10-94)	3.0
2-Fluorobiphenyl	100000	(43-116)	113.0	2-Fluorophenol	150000	(21-100)	122.0
Terphenyl-d14	100000	(33-141)	132.0	2,4,6-Tribromophenol	150000	(10-123)	24.0

Method Blank ID: 2921S.WBLX2 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.FBLX1 TCLP LCS ID: 2921S.TLCS2 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

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POP ANALYTICAL SERVICES  
 1680 Lake Front Circle, Suite 9, The Woodlands, TX 77380; (713) 363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPS-03 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.03 Date Received: 04/28/95  
 Project No.: 170R0603215LA Report No.: A6836 Date Reported: 05/23/95

GC/MS-TCLP SEMI-VOLATILES (DATA SHEET)

Sample Matrix: SOLID Dilution: 1.0 Method Ref.: SW846-8270  
 Multiplying Factor: 5:0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6836  
 Sample Volume: 200 ml Date Extracted: 05/12/95 Analyst: RRP  
 Extract Volume: 1.0 ml Date Analyzed: 05/20/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	50	ND
2,4,5-Trichlorophenol	400000	50	ND
2,4,6-Trichlorophenol	2000	50	ND
2,4-Dinitrotoluene	130	50	ND
2-Methylphenol	200000	50	ND
3+4-Methylphenols	200000	50	ND
Hexachlorobenzene	130	50	ND
Hexachlorobutadiene	500	50	ND
Hexachloroethane	3000	50	ND
Nitrobenzene	2000	50	ND
Pentachlorophenol	100000	125	ND
Pyridine	5000	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	250	(35-114)	66	Phenol-d5	375	(10-94)	69
2-Fluorobiphenyl	250	(43-116)	67	2-Fluorophenol	375	(21-100)	58
Terphenyl-d14	250	(33-141)	87	2,4,6-Tribromophenol	375	(10-123)	42

Method Blank ID: 2921S.MBLK1 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.TBLK1 TCLP LCS ID: 2921S.TLCS1 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

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LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPS-04 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.04 Date Received: 04/28/95  
 Project No.: 170R060J215LA Report No.: A6837 Date Reported: 05/23/95

GC/MS-TCLP SEMIVOLATILES (DATA SHEET)

Sample Matrix: SOLID Dilution: 1.0 Method Ref.: SW846-9270  
 Multiplying Factor: 5.0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6837  
 Sample Volume: 200 ml Date Extracted: 05/12/95 Analyst: RRP  
 Extract Volume: 1.0 ml Date Analyzed: 05/20/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	50	ND
1,4,5-Trichlorophenol	400000	50	ND
2,4,6-Trichlorophenol	2000	50	ND
2,4-Dinitrotoluene	130	50	ND
2-Methylphenol	200000	50	ND
3+4-Methylenols	200000	50	ND
Hexachlorobenzene	130	50	ND
Hexachlorobutadiene	500	50	ND
Hexachloroethane	3000	50	ND
Nitrobenzene	2000	50	ND
Pentachlorophenol	100000	125	ND
Pyridine	5000	50	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	250	(35-114)	71	Phenol-d5	375	(10-94)	68
2-Fluorobiphenyl	250	(43-116)	67	2-Fluorophenol	375	(21-100)	61
2-Phenyl-d14	250	(33-141)	32	2,4,6-Tribromophenol	375	(10-123)	46

Method Blank ID: 2921S.MBLK1 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.TBLK1 TCLP LCS ID: 2921S.TLCS1 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-CARBTANK-05 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.05 Date Received: 04/28/95  
 Project No.: 170R0603215LA Report No.: A6877 Date Reported: 05/23/95

GC/MS-TCLP SEMIVOLATILES (DATA SHEET)

Sample Matrix: LIQUID Dilution: 2.0 Method Ref.: SM846-8270  
 Multiplier Factor: 20000.0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6877  
 Sample Volume: 1 ml Date Extracted: 05/19/95 Analyst: RRP  
 Extract Volume: 10.0 ml Date Analyzed: 05/22/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	200000	ND
2,4,5-Trichlorophenol	400000	200000	ND
2,4,6-Trichlorophenol	2000	200000	ND
2,4-Dinitrotoluene	130	200000	ND
2-Methylphenol	200000	200000	18698800 E
3+4-Methylphenols	200000	200000	9684600 E
Hexachlorobenzene	130	200000	ND
Hexachlorobutadiene	500	200000	ND
Hexachloroethane	3000	200000	ND
Nitrobenzene	2000	200000	ND
Pentachlorophenol	100000	500000	ND
Pyridine	5000	200000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	100000	(35-114)	122.0	Phenol-d5	150000	(10-94)	122.0
2-Fluorobiphenyl	100000	(43-116)	117.0	2-Fluorophenol	150000	(21-100)	117.0
Terphenyl-d14	100000	(33-141)	120.0	2,4,6-Tribromophenol	150000	(10-123)	14.0

Method Blank ID: 2921S.FBLX2 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.FBLX1 TCLP LCS ID: 2921S.FLCS2 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-CARBANK-05 Date Sampled: 04/26/95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.05DL Date Received: 04/28/95  
 Project No.: 170R0603215LA Report No.: A6894 Date Reported: 05/23/95

GC/MS-TCLP SEMIVOLATILES (DATA SHEET)

Sample Matrix: LIQUID Dilution: 50.0 Method Ref.: SW846-8270  
 Multiplying Factor: 500000.0 Date TCLP Extracted: 05/10/95 GC/MS File ID: A6894  
 Sample Volume: 1 ml Date Extracted: 05/19/95 Analyst: RRP  
 Extract Volume: 10.0 ml Date Analyzed: 05/24/95

COMPOUND	REGULATORY LEVEL (ug/L) *	QUANTITATION LIMIT (ug/L)	RESULTS (ug/L)
1,4-Dichlorobenzene	7500	5000000	ND
2,4,5-Trichlorophenol	400000	5000000	ND
2,4,6-Trichlorophenol	2000	5000000	ND
2,4-Dinitrotoluene	130	5000000	ND
2-Methylphenol	200000	5000000	14870000
3+4-Methylphenols	200000	5000000	6465000
Hexachlorobenzene	130	5000000	ND
Hexachlorobutadiene	500	5000000	ND
Hexachloroethane	3000	5000000	ND
Nitrobenzene	2000	5000000	ND
Pentachlorophenol	100000	12500000	ND
Pyridine	5000	5000000	ND

QUALITY ASSURANCE/QUALITY CONTROL

Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery	Surrogate	Spike Added (ug/L)	QC Limits (Recovery)	% Recovery
Nitrobenzene-d5	100000	(35-114)	0.0	Phenol-d5	150000	(10-74)	0.0
2-Fluorobiphenyl	100000	(43-116)	0.0	2-Fluorophenol	150000	(21-100)	0.0
Terphenyl-d14	100000	(33-141)	0.0	2,4,6-Tribromophenol	150000	(10-123)	0.0

Method Blank ID: 2921S.N8LX2 LCS ID: NA MS ID: NA MSD ID: NA

TCLP Blank ID: 2921S.FBLX1 TCLP LCS ID: 2921S.TLCS2 TCLP MS ID: 2925.01MS TCLP MSD ID: NA

\* = Regulatory Levels are as stated in 40CFR 261.24 and are provided for information only.

000402

*TCLP METALS*

000548

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPS-03 Date Sampled: 04-26-95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.03 Date Received: 04-28-95  
 Project Number: 170R063215LA Report Number: I92503 Date Reported: 05-23-95

TCLP METALS (DATA SHEET)

Sample Matrix: SOLID Units: mg/L

ANALYTE	METHOD	DATE EXTRACTED	DATE PREPARED	DATE ANALYZED	QUANTITATION LIMIT	RESULT	ANALYST
Arsenic	SW846-6010	05-10-95	05-18-95	05-22-95	1	ND	RB
Barium	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	1.80	RB
Cadmium	SW846-6010	05-10-95	05-18-95	05-22-95	0.025	ND	RB
Chromium	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	ND	RB
Lead	SW846-6010	05-10-95	05-18-95	05-22-95	0.25	ND	RB
Mercury	SW846-7470	05-10-95	05-19-95	05-19-95	0.02	ND	CL
Selenium	SW846-6010	05-10-95	05-18-95	05-22-95	0.5	ND	RB
Silver	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	ND	RB

QUALITY ASSURANCE/QUALITY CONTROL

ICP Method Blank ID: ICP885 ICP LCS ID: ICP195 ICP MS ID: 2925.03MS  
 CVAA Method Blank ID: HG886 CVAA LCS ID: HGL86 CVAA MS ID: 2925.03MS  
 TCLP Extraction Blank ID: 2921.E1F1 ICP LCSD ID: ICP135D ICP MSD ID: NA  
 TCLP Filtration Blank ID: 2921.FLT.BLK CVAA LCSD ID: HGL86D CVAA MSD ID: NA

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPS-03 Date Sampled: 04-26-95  
 Project Name: COBRA INDUSTRIES, INC. POP Sample ID: 2925.03D Date Received: 04-28-95  
 Project Number: 170R063215LA Report Number: I92503D Date Reported: 05-23-95

TCLP METALS (DATA SHEET)

Sample Matrix: SOLID

Units: mg/L

ANALYTE	METHOD	DATE EXTRACTED	DATE PREPARED	DATE ANALYZED	QUANTITATION LIMIT	RESULT	ANALYST
Arsenic	SW846-6010	05-10-95	05-18-95	05-22-95	1	ND	RB
Barium	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	1.85	RB
Cadmium	SW846-6010	05-10-95	05-18-95	05-22-95	0.025	ND	RB
Chromium	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	ND	RB
Lead	SW846-6010	05-10-95	05-18-95	05-22-95	0.25	ND	RB
Mercury	SW846-7470	05-10-95	05-19-95	05-19-95	0.02	ND	CL
Selenium	SW846-6010	05-10-95	05-18-95	05-22-95	0.5	ND	RB
Silver	SW846-6010	05-10-95	05-18-95	05-22-95	0.05	ND	RB

QUALITY ASSURANCE/QUALITY CONTROL

ICP Method Blank ID: ICP885 ICP LCS ID: ICP185 ICP MS ID: 2925.03MS  
 VAA Method Blank ID: HG886 CVAA LCS ID: HGL86 CVAA MS ID: 2925.03MS  
 TCLP Extraction Blank ID: 2921.E1F1 ICP LCS D ID: ICP185D ICP MSD ID: NA  
 TCLP Filtration Blank ID: 2921.FLT.3LK CVAA LCS D ID: HGL86D CVAA MSD ID: NA

000552

LABORATORY REPORT

Client: PRC ENVIRONMENTAL Client Sample ID: COBRA-SUMPS-04 Date Sampled: 04-26-95  
 Project Name: COBRA INDUSTRIES, INC. PDP Sample ID: 2925.04 Date Received: 04-28-95  
 Project Number: 170R06321SLA Report Number: I92504 Date Reported: 05-23-95

TCLP METALS (DATA SHEET)

Sample Matrix: SOLID

Units: mg/L

ANALYTE	METHOD	DATE EXTRACTED	DATE PREPARED	DATE ANALYZED	QUANTITATION LIMIT	RESULT	ANALYST
Arsenic	SW846-6010	05-10-95	05-23-95	05-24-95	1	NO	RB
Barium	SW846-6010	05-10-95	05-23-95	05-24-95	0.05	3.68	RB
Cadmium	SW846-6010	05-10-95	05-23-95	05-24-95	0.025	NO	RB
Chromium	SW846-6010	05-10-95	05-23-95	05-24-95	0.05	NO	RB
Lead	SW846-6010	05-10-95	05-23-95	05-24-95	0.25	NO	RB
Mercury	SW846-7470	05-10-95	05-19-95	05-19-95	0.02	NO	KW
Selenium	SW846-6010	05-10-95	05-23-95	05-24-95	0.5	NO	RB
Silver	SW846-6010	05-10-95	05-23-95	05-24-95	0.05	NO	RB

QUALITY ASSURANCE/QUALITY CONTROL

ICP Method Blank ID: ICP890 ICP LCS ID: ICP190 ICP MS ID: 2925.03MS  
 CVAA Method Blank ID: HG886 CVAA LCS ID: HGL86 CVAA MS ID: 2925.03MS  
 TCLP Extraction Blank ID: 2921.E1F1 ICP LCSD ID: ICP190D ICP MSD ID: NA  
 TCLP Filtration Blank ID: 2921.FLT.BLK CVAA LCSD ID: HGL86D CVAA MSD ID: NA

*TOTAL VOLATILES*

000589

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

-SUMPL-01

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_

Matrix: (soil/water) SOIL Lab Sample ID: V292501

Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4891.D

Level: (low/med) MED Date Received: \_\_\_\_\_

% Moisture: not dec. 0 Date Analyzed: 5/10/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 666.0

Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

Concentration Units:

CAS No.	Compound	(ug/L or ug/Kg)	<u>ug/Kg</u>	Q
74-87-3	Chloromethane		799200	UD
74-83-9	Bromomethane		799200	UD
75-01-4	Vinyl Chloride		799200	UD
75-00-3	Chloroethane		799200	UD
75-09-2	Methylene Chloride		799200	UD
67-64-1	Acetone		799200	UD
75-15-0	Carbon Disulfide		799200	UD
75-35-4	1,1-Dichloroethene		799200	UD
75-34-4	1,1-Dichloroethane		799200	UD
540-59-0	1,2-Dichloroethene (total)		799200	UD
67-66-3	Chloroform		799200	UD
107-06-2	1,2-Dichloroethane		799200	UD
78-93-3	2-Butanone		799200	UD
71-55-6	1,1,1-Trichloroethane		799200	UD
56-23-5	Carbon Tetrachloride		799200	UD
75-27-4	Bromodichloromethane		799200	UD
78-87-5	1,2-Dichloropropane		799200	UD
10061-01-5	cis-1,3-Dichloropropene		799200	UD
79-01-6	Trichloroethene		799200	UD
124-48-1	Dibromochloromethane		799200	UD
79-00-5	1,1,2-Trichloroethane		799200	UD
71-43-2	Benzene		412900	JD
10061-02-6	trans-1,3-Dichloropropene		799200	UD
75-25-2	Bromoform		799200	UD
108-10-1	4-Methyl-2-Pentanone		799200	UD
591-78-6	2-Hexanone		799200	UD
127-18-4	Tetrachloroethene		799200	UD
79-34-5	1,1,2,2-Tetrachloroethane		799200	UD
108-88-3	Toluene		6E+06	D
108-90-7	Chlorobenzene		799200	UD
100-41-4	Ethylbenzene		4E+06	D
100-42-5	Styrene		799200	UD
1330-20-7	Xylene (total)		1E+07	D

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_

Matrix: (soil/water) SOIL Lab Sample ID: V292502

Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4892.D

Level: (low/med) MED Date Received: \_\_\_\_\_

% Moisture: not dec. 0 Date Analyzed: 5/10/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 666.0

Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	<u>ug/Kg</u>	
74-87-3	Chloromethane		799200	UD
74-83-9	Bromomethane		799200	UD
75-01-4	Vinyl Chloride		799200	UD
75-00-3	Chloroethane		799200	UD
75-09-2	Methylene Chloride		799200	UD
67-64-1	Acetone		799200	UD
75-15-0	Carbon Disulfide		799200	UD
75-35-4	1,1-Dichloroethene		799200	UD
75-34-4	1,1-Dichloroethane		799200	UD
540-59-0	1,2-Dichloroethene (total)		799200	UD
67-66-3	Chloroform		799200	UD
107-06-2	1,2-Dichloroethane		799200	UD
78-93-3	2-Butanone		799200	UD
71-55-6	1,1,1-Trichloroethane		799200	UD
56-23-5	Carbon Tetrachloride		799200	UD
75-27-4	Bromodichloromethane		799200	UD
78-87-5	1,2-Dichloropropane		799200	UD
10061-01-5	cis-1,3-Dichloropropene		799200	UD
79-01-6	Trichloroethene		799200	UD
124-48-1	Dibromochloromethane		799200	UD
79-00-5	1,1,2-Trichloroethane		799200	UD
71-43-2	Benzene		388800	JD
10061-02-6	trans-1,3-Dichloropropene		799200	UD
75-25-2	Bromoform		799200	UD
108-10-1	4-Methyl-2-Pentanone		799200	UD
591-78-6	2-Hexanone		799200	UD
127-18-4	Tetrachloroethene		799200	UD
79-34-5	1,1,2,2-Tetrachloroethane		799200	UD
108-88-3	Toluene		5E+06	D
108-90-7	Chlorobenzene		799200	UD
100-41-4	Ethylbenzene		4E+06	D
100-42-5	Styrene		799200	UD
1330-20-7	Xylene (total)		1E+07	D

Lab Name: PDP ANALYTICAL SERVICES Contract: PRCProject No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_Matrix: (soil/water) SOIL Lab Sample ID: V292503Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4886.DLevel: (low/med) MED Date Received: \_\_\_\_\_% Moisture: not dec. 0 Date Analyzed: 5/10/95GC Column: CAP ID: 0.53 (mm) Dilution Factor: 1250.0Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	<u>ug/Kg</u>	
74-87-3	Chloromethane		2E+06	UD
74-83-9	Bromomethane		2E+06	UD
75-01-4	Vinyl Chloride		2E+06	UD
75-00-3	Chloroethane		2E+06	UD
75-09-2	Methylene Chloride		2E+06	UD
67-64-1	Acetone		2E+06	UD
75-15-0	Carbon Disulfide		2E+06	UD
75-35-4	1,1-Dichloroethene		2E+06	UD
75-34-4	1,1-Dichloroethane		2E+06	UD
540-59-0	1,2-Dichloroethene (total)		2E+06	UD
67-66-3	Chloroform		2E+06	UD
107-06-2	1,2-Dichloroethane		2E+06	UD
78-93-3	2-Butanone		2E+06	UD
71-55-6	1,1,1-Trichloroethane		2E+06	UD
56-23-5	Carbon Tetrachloride		2E+06	UD
75-27-4	Bromodichloromethane		2E+06	UD
78-87-5	1,2-Dichloropropane		2E+06	UD
10061-01-5	cis-1,3-Dichloropropene		2E+06	UD
79-01-6	Trichloroethene		2E+06	UD
124-48-1	Dibromochloromethane		2E+06	UD
79-00-5	1,1,2-Trichloroethane		2E+06	UD
71-43-2	Benzene		2E+06	UD
10061-02-6	trans-1,3-Dichloropropene		2E+06	UD
75-25-2	Bromoform		2E+06	UD
108-10-1	4-Methyl-2-Pentanone		2E+06	UD
591-78-6	2-Hexanone		2E+06	UD
127-18-4	Tetrachloroethene		2E+06	UD
79-34-5	1,1,2,2-Tetrachloroethane		2E+06	UD
108-88-3	Toluene		732800	JD
108-90-7	Chlorobenzene		2E+06	UD
100-41-4	Ethylbenzene		2E+06	UD
100-42-5	Styrene		2E+06	UD
1330-20-7	Xylene (total)		2E+06	D

## VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

-SUMPS-04

Lab Name: PDP ANALYTICAL SERVICESContract: PRCProject No.: 170R0603215LASite: COBRA IN Location: \_\_\_\_\_

Group: \_\_\_\_\_

Matrix: (soil/water) SOILLab Sample ID: V292504Sample wt/vol: 4.0 (g/mL) GLab File ID: B4882.DLevel: (low/med) MED

Date Received: \_\_\_\_\_

% Moisture: not dec. 0Date Analyzed: 5/10/95GC Column: CAP ID: 0.53 (mm)Dilution Factor: 100.0Soil Extract Volume: 10000 (uL)Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	ug/Kg	
74-87-3	Chloromethane		120000	UD
74-83-9	Bromomethane		120000	UD
75-01-4	Vinyl Chloride		120000	UD
75-00-3	Chloroethane		120000	UD
75-09-2	Methylene Chloride		120000	UD
67-64-1	Acetone		120000	UD
75-15-0	Carbon Disulfide		120000	UD
75-35-4	1,1-Dichloroethene		120000	UD
75-34-4	1,1-Dichloroethane		120000	UD
540-59-0	1,2-Dichloroethene (total)		120000	UD
67-66-3	Chloroform		120000	UD
107-06-2	1,2-Dichloroethane		120000	UD
78-93-3	2-Butanone		120000	UD
71-55-6	1,1,1-Trichloroethane		120000	UD
56-23-5	Carbon Tetrachloride		120000	UD
75-27-4	Bromodichloromethane		120000	UD
78-87-5	1,2-Dichloropropane		120000	UD
10061-01-5	cis-1,3-Dichloropropene		120000	UD
79-01-6	Trichloroethene		120000	UD
124-48-1	Dibromochloromethane		120000	UD
79-00-5	1,1,2-Trichloroethane		120000	UD
71-43-2	Benzene		56100	JD
10061-02-6	trans-1,3-Dichloropropene		120000	UD
75-25-2	Bromoform		120000	UD
108-10-1	4-Methyl-2-Pentanone		120000	UD
591-78-6	2-Hexanone		120000	UD
127-18-4	Tetrachloroethene		120000	UD
79-34-5	1,1,2,2-Tetrachloroethane		120000	UD
108-88-3	Toluene		938500	D
108-90-7	Chlorobenzene		120000	UD
100-41-4	Ethylbenzene		503100	D
100-42-5	Styrene		120000	UD
1330-20-7	Xylene (total)		2E+06	D

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

CARBTANK-05

Lab Name: PDP ANALYTICAL Contract: \_\_\_\_\_

Lab Code: \_\_\_\_\_ Case No.: PRC SAS No.: \_\_\_\_\_ SDG No.: 2925

Matrix: (soil/water) WATER Lab Sample ID: 2925 05

Sample wt/vol: 5.00 (g/mL) ML Lab File ID: E2994

Level: (low/med) LOW Date Received: 04/28/95

% Moisture: not dec. \_\_\_\_\_ Date Analyzed: 05/10/95

Column: (pack/cap) CAP Dilution Factor: 6200

CONCENTRATION UNITS:  
(ug/L or ug/Kg) UG/L

CAS NO.. COMPOUND Q

74-87-3-----	Chloromethane	62000	U
74-83-9-----	Bromomethane	62000	U
75-01-4-----	Vinyl Chloride	62000	U
75-00-3-----	Chloroethane	62000	U
75-09-2-----	Methylene Chloride	910000	U
67-64-1-----	Acetone	62000	U
75-15-0-----	Carbon Disulfide	31000	U
75-35-4-----	1,1-Dichloroethene	31000	U
75-34-3-----	1,1-Dichloroethane	31000	U
540-59-0-----	1,2-Dichloroethene (total)	31000	U
67-66-3-----	Chloroform	31000	U
107-06-2-----	1,2-Dichloroethane	31000	U
78-93-3-----	2-Butanone	62000	U
71-55-6-----	1,1,1-Trichloroethane	31000	U
56-23-5-----	Carbon Tetrachloride	31000	U
108-05-4-----	Vinyl Acetate	62000	U
75-27-4-----	Bromodichloromethane	31000	U
78-87-5-----	1,2-Dichloropropane	31000	U
10061-01-5-----	cis-1,3-Dichloropropene	31000	U
10061-02-6-----	Trans-1,3-Dichloropropene	31000	U
79-01-6-----	Trichloroethene	31000	U
124-48-1-----	Dibromochloromethane	31000	U
79-00-5-----	1,1,2-Trichloroethane	31000	U
71-43-2-----	Benzene	31000	U
10061-01-5-----	cis-1,3-Dichloropropene	31000	U
10061-02-6-----	trans-1,3-Dichloropropene	31000	U
75-25-2-----	Bromoform	31000	U
108-10-1-----	4-Methyl-2-Pentanone	62000	U
591-78-6-----	2-Hexanone	62000	U
127-18-4-----	Tetrachloroethene	31000	U
79-34-5-----	1,1,2,2-Tetrachloroethane	31000	U
108-88-3-----	Toluene	31000	U
108-90-7-----	Chlorobenzene	31000	U
100-41-4-----	Ethylbenzene	31000	U
100-42-5-----	Styrene	31000	U
1330-20-7-----	Xylene (total)	31000	U

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

OIL\_TANK\_08

Lab Name: PDP ANALYTICAL Contract: \_\_\_\_\_

Lab Code: \_\_\_\_\_ Case No.: PRC SAS No.: \_\_\_\_\_ SDG No.: 2925

Matrix: (soil/water) WATER Lab Sample ID: 2925\_06

Sample wt/vol: 5.00 (g/mL) ML Lab File ID: E2997

Level: (low/med) LOW Date Received: 04/28/95

% Moisture: not dec. \_\_\_\_\_ Date Analyzed: 05/10/95

Column: (pack/cap) CAP Dilution Factor: 1200

CONCENTRATION UNITS:  
(ug/L or ug/Kg) UG/L Q

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) <u>UG/L</u>	Q
74-87-3	Chloromethane	12000	U
74-83-9	Bromomethane	12000	U
75-01-4	Vinyl Chloride	12000	U
75-00-3	Chloroethane	12000	U
75-09-2	Methylene Chloride	6200	U
67-64-1	Acetone	12000	U
75-15-0	Carbon Disulfide	6200	U
75-35-4	1,1-Dichloroethene	6200	U
75-34-3	1,1-Dichloroethane	6200	U
540-59-0	1,2-Dichloroethene (total)	6200	U
67-66-3	Chloroform	6200	U
107-06-2	1,2-Dichloroethane	6200	U
78-93-3	2-Butanone	12000	U
71-55-6	1,1,1-Trichloroethane	6200	U
56-23-5	Carbon Tetrachloride	6200	U
108-05-4	Vinyl Acetate	12000	U
75-27-4	Bromodichloromethane	6200	U
78-87-5	1,2-Dichloropropane	6200	U
10061-01-5	cis-1,3-Dichloropropene	6200	U
10061-02-6	Trans-1,3-Dichloropropene	6200	U
79-01-6	Trichloroethene	6200	U
124-48-1	Dibromochloromethane	6200	U
79-00-5	1,1,2-Trichloroethane	6200	U
71-43-2	Benzene	6200	U
10061-01-5	cis-1,3-Dichloropropene	6200	U
10061-02-6	trans-1,3-Dichloropropene	6200	U
75-25-2	Bromoform	6200	U
108-10-1	4-Methyl-2-Pentanone	12000	U
591-78-6	2-Hexanone	12000	U
127-18-4	Tetrachloroethene	6200	U
79-34-5	1,1,2,2-Tetrachloroethane	6200	U
108-88-3	Toluene	51000	U
108-90-7	Chlorobenzene	6200	U
100-41-4	Ethylbenzene	100000	U
100-42-5	Styrene	6200	U
1330-20-7	Xylene (total)	210000	U

000650

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

WATERTANK-07

Lab Name: PDP ANALYTICAL Contract: \_\_\_\_\_

Lab Code: \_\_\_\_\_ Case No.: PRC SAS No.: \_\_\_\_\_ SDG No.: 2925

Matrix: (soil/water) WATER Lab Sample ID: 2925 08

Sample wt/vol: 5.00 (g/mL) ML Lab File ID: E2814

Level: (low/med) LOW Date Received: 04/27/95

% Moisture: not dec. \_\_\_\_\_ Date Analyzed: 05/02/95

Column: (pack/cap) CAP Dilution Factor: 1.0

CONCENTRATION UNITS:  
(ug/L or ug/Kg) UG/L

CAS NO.                      COMPOUND                      Q

74-87-3	-----Chloromethane	10	U
74-83-9	-----Bromomethane	10	U
75-01-4	-----Vinyl Chloride	10	U
75-00-3	-----Chloroethane	10	U
75-09-2	-----Methylene Chloride	5	U
67-64-1	-----Acetone	10	U
75-15-0	-----Carbon Disulfide	5	U
75-35-4	-----1,1-Dichloroethene	5	U
75-34-3	-----1,1-Dichloroethane	5	U
540-59-0	-----1,2-Dichloroethene (total)	5	U
67-66-3	-----Chloroform	5	U
107-06-2	-----1,2-Dichloroethane	5	U
78-93-3	-----2-Butanone	10	U
71-55-6	-----1,1,1-Trichloroethane	5	U
56-23-5	-----Carbon Tetrachloride	5	U
108-05-4	-----Vinyl Acetate	10	U
75-27-4	-----Bromodichloromethane	5	U
78-87-5	-----1,2-Dichloropropane	5	U
10061-01-5	-----cis-1,3-Dichloropropene	5	U
10061-02-6	-----Trans-1,3-Dichloropropene	5	U
79-01-6	-----Trichloroethene	5	U
124-48-1	-----Dibromochloromethane	5	U
79-00-5	-----1,1,2-Trichloroethane	5	U
71-43-2	-----Benzene	5	U
10061-01-5	-----cis-1,3-Dichloropropene	5	U
10061-02-6	-----trans-1,3-Dichloropropene	5	U
75-25-2	-----Bromoform	5	U
108-10-1	-----4-Methyl-2-Pentanone	10	U
591-78-6	-----2-Hexanone	10	U
127-18-4	-----Tetrachloroethene	5	U
79-34-5	-----1,1,2,2-Tetrachloroethane	5	U
108-88-3	-----Toluene	5	U
108-90-7	-----Chlorobenzene	5	U
100-41-4	-----Ethylbenzene	5	U
100-42-5	-----Styrene	5	U
1330-20-7	-----Xylene (total)	5	U

000660

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

SOIL-09

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_

Matrix: (soil/water) SOIL Lab Sample ID: V292509

Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4877.D

Level: (low/med) MED Date Received: \_\_\_\_\_

% Moisture: not dec. 0 Date Analyzed: 5/10/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 20.0

Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	<u>ug/Kg</u>	
74-87-3	Chloromethane		24000	UD
74-83-9	Bromomethane		24000	UD
75-01-4	Vinyl Chloride		24000	UD
75-00-3	Chloroethane		24000	UD
75-09-2	Methylene Chloride		24000	UD
67-64-1	Acetone		24000	UD
75-15-0	Carbon Disulfide		24000	UD
75-35-4	1,1-Dichloroethene		24000	UD
75-34-4	1,1-Dichloroethane		24000	UD
540-59-0	1,2-Dichloroethene (total)		24000	UD
67-66-3	Chloroform		24000	UD
107-06-2	1,2-Dichloroethane		24000	UD
78-93-3	2-Butanone		24000	UD
71-55-6	1,1,1-Trichloroethane		24000	UD
56-23-5	Carbon Tetrachloride		24000	UD
75-27-4	Bromodichloromethane		24000	UD
78-87-5	1,2-Dichloropropane		24000	UD
10061-01-5	cis-1,3-Dichloropropene		24000	UD
79-01-6	Trichloroethene		24000	UD
124-48-1	Dibromochloromethane		24000	UD
79-00-5	1,1,2-Trichloroethane		24000	UD
71-43-2	Benzene		24000	UD
10061-02-6	trans-1,3-Dichloropropene		24000	UD
75-25-2	Bromoform		24000	UD
108-10-1	4-Methyl-2-Pentanone		24000	UD
591-78-6	2-Hexanone		24000	UD
127-18-4	Tetrachloroethene		24000	UD
79-34-5	1,1,2,2-Tetrachloroethane		24000	UD
108-88-3	Toluene		24000	UD
108-90-7	Chlorobenzene		24000	UD
100-41-4	Ethylbenzene		1E+06	D
100-42-5	Styrene		28700	D
1330-20-7	Xylene (total)		7E+06	D

000663

1A  
VOLATILE ORGANICS ANALYSIS DATA SHEET

SAMPLE NO.

-SOIL-09RE

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_

Matrix: (soil/water) SOIL Lab Sample ID: V292509R

Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4878.D

Level: (low/med) MED Date Received: \_\_\_\_\_

% Moisture: not dec. 0 Date Analyzed: 5/10/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 100.0

Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	<u>ug/Kg</u>	
74-87-3	Chloromethane		120000	UD
74-83-9	Bromomethane		120000	UD
75-01-4	Vinyl Chloride		120000	UD
75-00-3	Chloroethane		120000	UD
75-09-2	Methylene Chloride		120000	UD
67-64-1	Acetone		120000	UD
75-15-0	Carbon Disulfide		120000	UD
75-35-4	1,1-Dichloroethene		120000	UD
75-34-4	1,1-Dichloroethane		120000	UD
540-59-0	1,2-Dichloroethene (total)		120000	UD
67-66-3	Chloroform		120000	UD
107-06-2	1,2-Dichloroethane		120000	UD
78-93-3	2-Butanone		120000	UD
71-55-6	1,1,1-Trichloroethane		120000	UD
56-23-5	Carbon Tetrachloride		120000	UD
75-27-4	Bromodichloromethane		120000	UD
78-87-5	1,2-Dichloropropane		120000	UD
10061-01-5	cis-1,3-Dichloropropene		120000	UD
79-01-6	Trichloroethene		120000	UD
124-48-1	Dibromochloromethane		120000	UD
79-00-5	1,1,2-Trichloroethane		120000	UD
71-43-2	Benzene		120000	UD
10061-02-6	trans-1,3-Dichloropropene		120000	UD
75-25-2	Bromoform		120000	UD
108-10-1	4-Methyl-2-Pentanone		120000	UD
591-78-6	2-Hexanone		144400	D
127-18-4	Tetrachloroethene		120000	UD
79-34-5	1,1,2,2-Tetrachloroethane		120000	UD
108-88-3	Toluene		120000	UD
108-90-7	Chlorobenzene		120000	UD
100-41-4	Ethylbenzene		1E+06	D
100-42-5	Styrene		120000	UD
1330-20-7	Xylene (total)		6E+06	D

Lab Name: PDP ANALYTICAL SERVICES Contract: PRCProject No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_Matrix: (soil/water) SOIL Lab Sample ID: V292510Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4879.DLevel: (low/med) MED Date Received: \_\_\_\_\_% Moisture: not dec. 0 Date Analyzed: 5/10/95GC Column: CAP ID: 0.53 (mm) Dilution Factor: 100.0Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	<u>ug/Kg</u>	
74-87-3	Chloromethane	120000		UD
74-83-9	Bromomethane	120000		UD
75-01-4	Vinyl Chloride	120000		UD
75-00-3	Chloroethane	120000		UD
75-09-2	Methylene Chloride	120000		UD
67-64-1	Acetone	120000		UD
75-15-0	Carbon Disulfide	120000		UD
75-35-4	1,1-Dichloroethene	120000		UD
75-34-4	1,1-Dichloroethane	120000		UD
540-59-0	1,2-Dichloroethene (total)	120000		UD
67-66-3	Chloroform	120000		UD
107-06-2	1,2-Dichloroethane	120000		UD
78-93-3	2-Butanone	120000		UD
71-55-6	1,1,1-Trichloroethane	120000		UD
56-23-5	Carbon Tetrachloride	120000		UD
75-27-4	Bromodichloromethane	120000		UD
78-87-5	1,2-Dichloropropane	120000		UD
10061-01-5	cis-1,3-Dichloropropene	120000		UD
79-01-6	Trichloroethene	120000		UD
124-48-1	Dibromochloromethane	120000		UD
79-00-5	1,1,2-Trichloroethane	120000		UD
71-43-2	Benzene	120000		UD
10061-02-6	trans-1,3-Dichloropropene	120000		UD
75-25-2	Bromoform	120000		UD
108-10-1	4-Methyl-2-Pentanone	120000		UD
591-78-6	2-Hexanone	120000		UD
127-18-4	Tetrachloroethene	120000		UD
79-34-5	1,1,2,2-Tetrachloroethane	120000		UD
108-88-3	Toluene	120000		UD
108-90-7	Chlorobenzene	120000		UD
100-41-4	Ethylbenzene	3E+06		D
100-42-5	Styrene	120000		UD
1330-20-7	Xylene (total)	1E+07		D

## VOLATILE ORGANICS ANALYSIS DATA SHEET

-SOIL-10RE

Lab Name: PDP ANALYTICAL SERVICES Contract: PRC

Project No.: 170R0603215LA Site: COBRA IN Location: \_\_\_\_\_ Group: \_\_\_\_\_

Matrix: (soil/water) SOIL Lab Sample ID: V292510R

Sample wt/vol: 4.0 (g/mL) G Lab File ID: B4880.D

Level: (low/med) MED Date Received: \_\_\_\_\_

% Moisture: not dec. 0 Date Analyzed: 5/10/95

GC Column: CAP ID: 0.53 (mm) Dilution Factor: 200.0

Soil Extract Volume: 10000 (uL) Soil Aliquot Volume: 100 (uL)

CAS No.	Compound	Concentration Units:		Q
		(ug/L or ug/Kg)	ug/Kg	
74-87-3	Chloromethane	240000		UD
74-83-9	Bromomethane	240000		UD
75-01-4	Vinyl Chloride	240000		UD
75-00-3	Chloroethane	240000		UD
75-09-2	Methylene Chloride	240000		UD
67-64-1	Acetone	240000		UD
75-15-0	Carbon Disulfide	240000		UD
75-35-4	1,1-Dichloroethene	240000		UD
75-34-4	1,1-Dichloroethane	240000		UD
540-59-0	1,2-Dichloroethene (total)	240000		UD
67-66-3	Chloroform	240000		UD
107-06-2	1,2-Dichloroethane	240000		UD
78-93-3	2-Butanone	240000		UD
71-55-6	1,1,1-Trichloroethane	240000		UD
56-23-5	Carbon Tetrachloride	240000		UD
75-27-4	Bromodichloromethane	240000		UD
78-87-5	1,2-Dichloropropane	240000		UD
10061-01-5	cis-1,3-Dichloropropene	240000		UD
79-01-6	Trichloroethene	240000		UD
124-48-1	Dibromochloromethane	240000		UD
79-00-5	1,1,2-Trichloroethane	240000		UD
71-43-2	Benzene	240000		UD
10061-02-6	trans-1,3-Dichloropropene	240000		UD
75-25-2	Bromoform	240000		UD
108-10-1	4-Methyl-2-Pentanone	240000		UD
591-78-6	2-Hexanone	240000		UD
127-18-4	Tetrachloroethene	240000		UD
79-34-5	1,1,2,2-Tetrachloroethane	240000		UD
108-88-3	Toluene	240000		UD
108-90-7	Chlorobenzene	240000		UD
100-41-4	Ethylbenzene	2E+06		D
100-42-5	Styrene	240000		UD
1330-20-7	Xylene (total)	1E+07		D

*GENERAL CHEMISTRY*

000917

POP ANALYTICAL SERVICES  
 1680 Lake Front Circle, Ste.9; Woodlands TX 77380; Phone (713)363-2233

LABORATORY REPORT

Client: PRC ENVIRONMENTAL  
 Project Name: COBRA INDUSTRIES, INC.  
 Project No: 170R063215LA

Date Reported: 05-23-95  
 Report No: I925IGN  
 Analyst: KW

WET CHEMISTRY PARAMETER: Ignitability

Method Reference: SW-846 1010

UNITS: Degrees F

POP LABORATORY ID	CLIENT ID	MATRIX	DATE SAMPLED	DATE RECEIVED	DATE PREPARED	DATE ANALYZED	QUANT LIMIT	RESULT	SPIKE ADDED OR TRUE VALUE	RELATIVE PERCENT DIFF(20)	PERCENT RECOVERY (75-125)
2925.01	COBRA-SUMPL-01	LIQUID	04-26-95	04-28-95	NA	05-22-95	>200	98			
2925.05	COBRA-CARBANK-05	LIQUID	04-26-95	04-28-95	NA	05-22-95	>200	>200			

QUALITY ASSURANCE/QUALITY CONTROL

PBM	METHOD BLANK	NA	NA	NA	NA	05-22-95	>200	>200			
LCS1	LAB CONTROL STD	NA	NA	NA	NA	05-22-95	>200	35	34		101
LCS2	LAB CONTROL STD	NA	NA	NA	NA	05-22-95	>200	34	34	1.2	100
2922.01	SAMPLE	NA	NA	NA	NA	05-22-95	>200	100			
2922.010	DUPLICATE	NA	NA	NA	NA	05-22-95	>200	98		2.0	

000915

*SPECIFIC GRAVITY*

000009



# Inchcape Testing Services

Environmental Laboratories

1089 E. Collins Blvd.  
Richardson, TX 75081  
Tel. 214-258-5591  
Fax. 214-258-5592

DATE RECEIVED : 3-MAY-1995

REPORT NUMBER : D95-4022-1

REPORT DATE : 6-MAY-1995

SAMPLE SUBMITTED BY : PDP Analytical Services  
ADDRESS : 1680 Lake Front Circle  
: Woodlands, TX 77380  
ATTENTION : Mr. Mark Bourgeois

SAMPLE MATRIX : Liquid  
ID MARKS : 2925.01  
DATE SAMPLED : 2-MAY-1995

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Specific Gravity at 25 C	/1	0.834
Analyzed using ASTM D1429 on 5-MAY-1995 by RJS QC Batch No : 405008A		

000010



# Inchcape Testing Services

Environmental Laboratories

1089 E. Collins Blvd.  
Richardson, TX 75081  
Tel. 214-258-5591  
Fax. 214-258-5592

DATE RECEIVED : 3-MAY-1995

REPORT NUMBER : D95-4022-2  
REPORT DATE : 6-MAY-1995

SAMPLE SUBMITTED BY : PDP Analytical Services  
ADDRESS : 1680 Lake Front Circle  
: Woodlands, TX 77380  
ATTENTION : Mr. Mark Bourgeois

SAMPLE MATRIX : Liquid  
ID MARKS : 2925.03  
DATE SAMPLED : 2-MAY-1995

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Specific Gravity at 25 C	/1	1.28
Analyzed using ASTM D1429 on 5-MAY-1995 by RJS QC Batch No : 405008A		

000011



# Inchcape Testing Services

## Environmental Laboratories

1089 E. Collins Blvd.  
Richardson, TX 75081  
Tel. 214-258-5591  
Fax. 214-258-3592

DATE RECEIVED : 3-MAY-1995

REPORT NUMBER : D95-4022-3  
REPORT DATE : 6-MAY-1995

SAMPLE SUBMITTED BY : PDP Analytical Services  
ADDRESS : 1580 Lake Front Circle  
: Woodlands, TX 77380  
ATTENTION : Mr. Mark Bourgeois

SAMPLE MATRIX : Liquid  
ID MARKS : 2925.05  
DATE SAMPLED : 2-MAY-1995

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Specific Gravity at 25 C	/1	0.980
Analyzed using ASTM D1429 on 5-MAY-1995 by RJS QC Batch No : 405008A		

000012



# Inchcape Testing Services

Environmental Laboratories

1089 E. Collins Blvd.  
Richardson, TX 75081  
Tel. 214-258-5591  
Fax. 214-258-5592

DATE RECEIVED : 3-MAY-1995

REPORT NUMBER : D95-4022-4

REPORT DATE : 6-MAY-1995

SAMPLE SUBMITTED BY : PDP Analytical Services  
ADDRESS : 1680 Lake Front Circle  
: Woodlands, TX 77380  
ATTENTION : Mr. Mark Bourgeois

SAMPLE MATRIX : Liquid  
ID MARKS : 2925.06  
DATE SAMPLED : 2-MAY-1995

MISCELLANEOUS ANALYSES		
TEST REQUESTED	DETECTION LIMIT	RESULTS
Specific Gravity at 25 C	/1	0.818
Analyzed using ASTM 01429 on 5-MAY-1995 by RJS QC Batch No : 405008A		

000013

*DATA FLAGS AND ABBREVIATIONS*

000920

# PDP ANALYTICAL SERVICES

1680 Lake Front Circle, Suite B, The Woodlands, TX 77380

## CLP QUALIFIERS

### Inorganic Analysis:

- C (Concentration)
- B A reported value obtained from a reading that was less than the Contract Required Detection Limit ( CRDL) but greater than or equal to the Instrument Detection Limit (IDL).
  - U When the analyte was analyzed for but not detected.
- Q (Qualifier)
- E The reported value is estimated because of the presence of interference.
  - M Duplicate injection precision not met.
  - N Spiked sample recovery not within control limits.
  - S The reported value was determined by the Method of Standard Additions (MSA).
  - W Post-digestion spike for Furnace AA analysis is out of control limits (85-115%), while sample absorbance is less than 50% of spike absorbance.
  - Duplicate analysis not within control limits.
  - + Correlation coefficient for the MSA is less than 0.995.
- M (Method) qualifier—enter:
- P - for ICP
  - A - for Flame AA
  - F - for Furnace AA
  - PM - for ICP when Microwave Digestion is used
  - AM - for Flame AA when Microwave Digestion is used
  - FM - for Furnace AA when Microwave Digestion is used
  - CV - for Manual Cold Vapor AA
  - AV - for Automated Cold Vapor AA
  - CA - for Midi-Distillation Spectrophotometric
  - AS - for Semi-Automated Spectrophotometric
  - C -for Manual Spectrophotometric
  - T - for Titrimetric
  - . . where no data has been entered
  - NR - if the analyte is not required to be analyzed

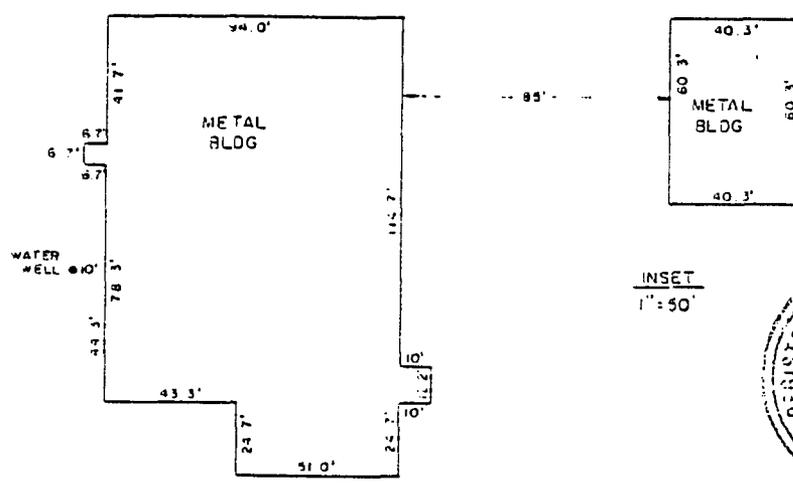
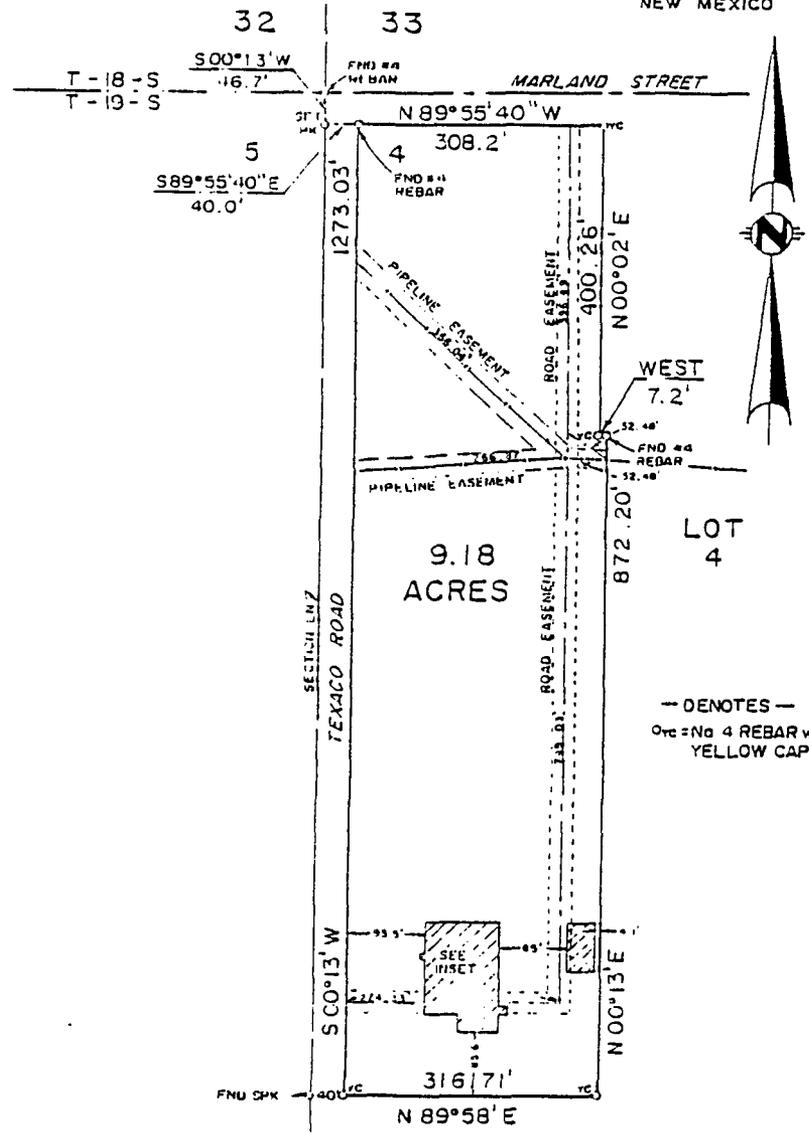
### Organic Analysis

- U This flag indicates the compound was analyzed for but not detected.
- J This flag indicates an estimated value. This flag is used (1) when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, (2) when the mass spectral and retention time data indicate the presence of a compound that meets the volatile and semivolatiles GC/MS identification criteria, and the result is less than the CRQL but greater than zero, and (3) when the retention time data indicate the presence of a compound that meets the pesticide/Aroclor I identification criteria, and the result is less than the CRQL but greater than zero.
- N This flag indicates presumptive evidence of a compound. This flag is only used for tentatively identified compounds (TICs), where the identification is based on a mass spectral library search.
- P This flag is used for a pesticide/Aroclor target analyte when there is greater than 25% difference for detected concentrations between the two GC columns.
- C This flag applies to pesticide results where the identification has been confirmed by GC/MS.
- B This flag is used when the analyte is found in the associated method blank as well as in the sample.
- E This flag identifies compounds whose concentrations exceed the upper level of the calibration range of the instrument for that specific analysis.
- D All reported concentrations of a diluted analysis are flagged with the .D. flag.
- A This flag indicates that a tentatively identified compound is a suspected aldol-condensation product.
- X See SDG or case narrative for explanation.

c:\forms\clpqfy.doc

000921

**ATTACHMENT B**  
**PLATS OF COBRA PROPERTY AND BUILDINGS**  
**(Two Sheets)**



I HEREBY CERTIFY THAT THIS PLAT WAS MADE FROM NOTES TAKEN IN THE FIELD IN A BONA FIDE SURVEY MADE UNDER MY SUPERVISION, AND THAT THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF

*John W. West*  
JOHN W. WEST, N.M. P.E. & L.S. No 676  
TEXAS R.P.S. No 1138  
RONALD J. EIDSON, N.M. L.S. No 3239  
TEXAS R.P.S. No 1883

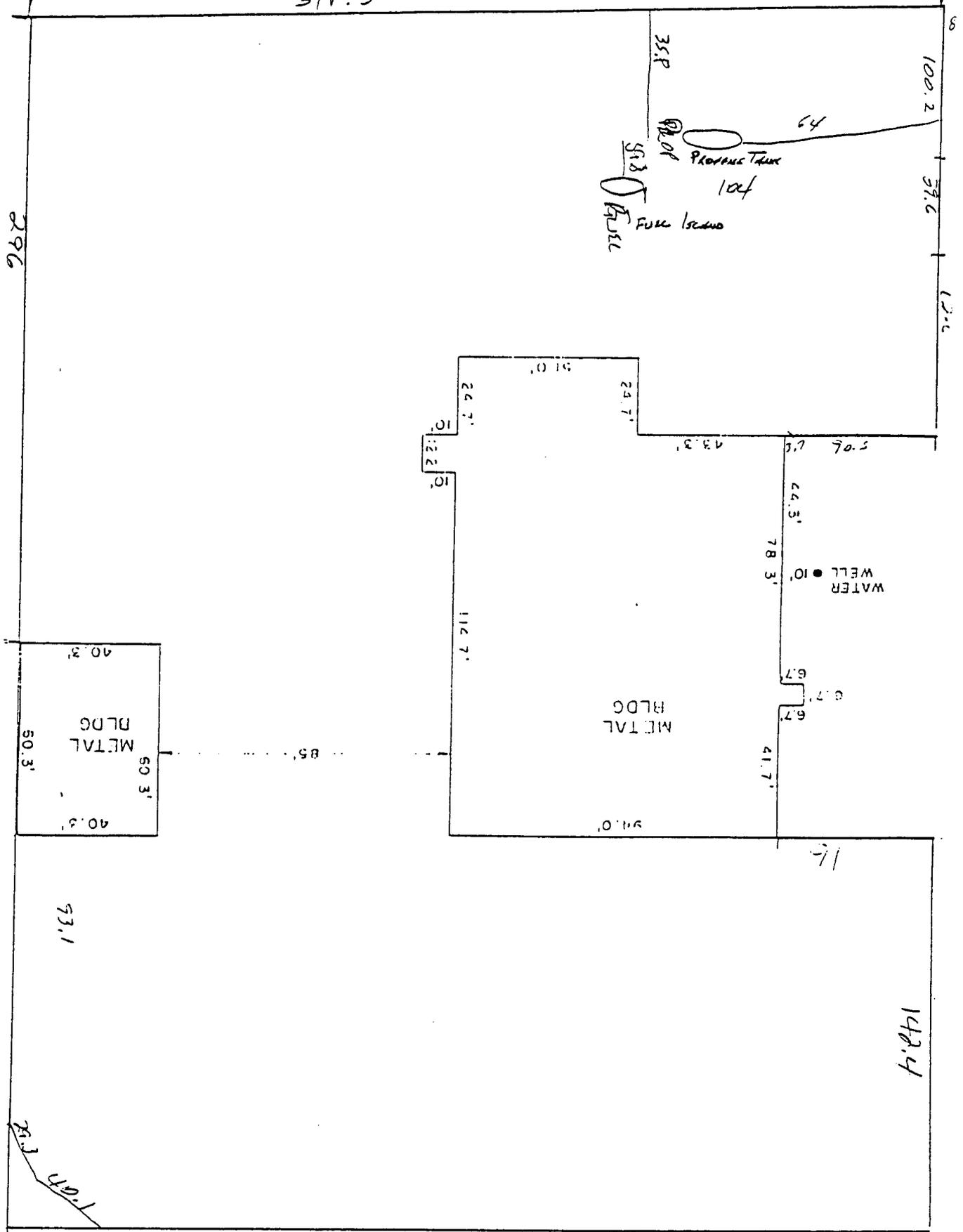
A WELDERS AND SUPPLY CO.

A TRACT OF LAND LOCATED IN LOT 4, SECTION 4, TOWNSHIP 19 SOUTH, RANGE 38 EAST, N.M.P.M., LEA COUNTY, NEW MEXICO.

JOHN W. WEST ENGINEERING COMPANY  
CONSULTING ENGINEERS HOBBS, NEW MEXICO

Scale 1" = 100'	Drawn By
Date 1-1-1988	Sheet 1 of 2 Sheets

311.3



142.4

93.1

S.S. 151.6

**ATTACHMENT C**

**COBRA'S TOXICITY CHARACTERISTIC LEACHING PROCEDURE AND OTHER  
CHARACTERISTICS ANALYSIS OF SAND TRAP (WASH BAY SUMP) SLUDGE**

**(Two Sheets)**



# ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

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

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

## TCLP ANALYSIS REPORT

Company: Cobra Industries  
Address: P.O. Box 2040  
City, State: Hobbs, NM 88240

Date: 3/29/95  
Lab #: H1991

Project Name: not given  
Location: 720 Texaco Rd, Hobbs, NM  
Sampled by: HO  
Sample Type: Sludge

Date: 3/16/95  
Sample Condition: Intact

Sample ID: Sand Trap

### TCLP ORGANICS

PARAMETER	RESULT	EPA LIMIT	UNITS
Pyridine	<0.002	5.00	ppm
o-Cresol	26.700	200	ppm
m,p-Cresol	31.200	200	ppm
Hexachloroethane	<0.002	3.00	ppm
Nitrobenzene	<0.002	2.00	ppm
Hexachloro-1,3-butadiene	<0.002	0.500	ppm
2,4,6-Trichlorophenol	<0.002	2.00	ppm
2,4,5-Trichlorophenol	<0.002	400	ppm
2,4-Dinitrotoluene	<0.002	0.130	ppm
Hexachlorobenzene	<0.002	0.130	ppm
Pentachlorophenol	<0.002	100	ppm
Vinyl chloride	<0.001	0.20	ppm
1,1-Dichloroethylene	<0.001	0.70	ppm
Methyl ethyl ketone	<0.001	200	ppm
Chloroform	<0.001	6.00	ppm
1,2-Dichloroethane	<0.001	0.50	ppm
Benzene	0.406	0.50	ppm
Carbon tetrachloride	<0.001	0.50	ppm
Trichloroethylene	<0.001	0.50	ppm
Tetrachloroethylene	<0.001	0.70	ppm
Chlorobenzene	<0.001	100	ppm
1,4-Dichlorobenzene	<0.001	7.50	ppm

### TCLP INORGANICS (Leachate)

PARAMETER	RESULT	EPA LIMIT	UNITS
Silver	<0.1	5.0	ppm
Arsenic	0.015	5.0	ppm
Barium	0.97	100.0	ppm
Cadmium	<0.1	1.0	ppm
Chromium	<0.1	5.0	ppm
Mercury	<0.001	0.2	ppm
Lead	0.21	5.0	ppm
Selenium	<0.01	1.0	ppm

### HAZARDOUS WASTE CHARACTERIZATION

PARAMETER	RESULT	EPA LIMIT	UNITS
Ignitability (Pensky-Martens Closed Cup)	88	140	F
Corrosivity, (pH)	8.09	<2.0 or >12.5	
Reactivity (H <sub>2</sub> S)	2.3		H <sub>2</sub> S/kg
Reactivity (HCN)	<0.03		HCN/kg
METHODS: TCLP ORGANICS - EPA 9260/8270			
METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000			
METHODS: HWC - EPA SW 946			

  
Michael R. Fowler

  
Date: 3/20/95

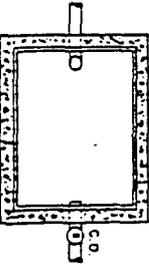


**ATTACHMENT D**

**DESIGN PLANS FOR WASH BAY SUMP**

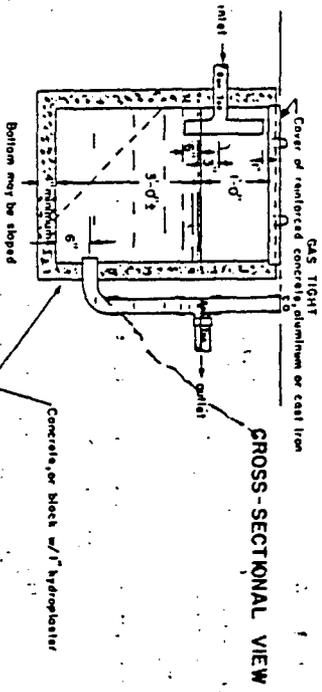
**(Two Sheets)**

**A. TYPICAL GREASE INTERCEPTOR**



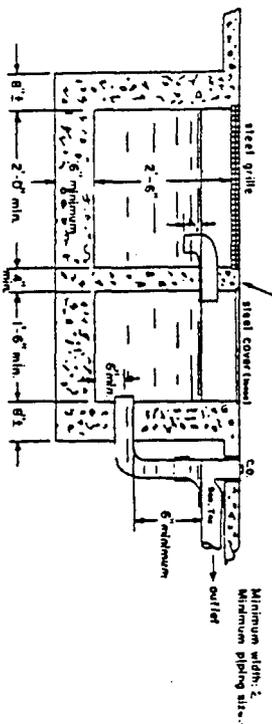
**TOP PLAN**

Dimensions on application to  
 Plumbing Administrative Board  
 Office  
 Minimum spacing sites 2'



**GROSS-SECTIONAL VIEW**

**B. TYPICAL SAND AND GREASE INTERCEPTOR FOR AUTO-WASH**



**RECOMMENDED DESIGN**

*4' x 5' x 5' = 750 gallon capacity - (in construction)*

Domestic sewage means the liquid and solid from the ordinary living processes, free of such character as to permit satisfactory treatment, into the public sewer or by separate disposal system.

any pipe which carries waste or water-borne sewage system.

A drainage system (drainage piping) within public or private premises, which conveys wastes to a legal point of disposal, but does not connect to a public sewer system or a public sewage plant.

Curham system is a term used to describe where all piping is of threaded pipe, tubing or pipe, using recessed drainage fittings to connect piping.

- E -

The effective opening is the minimum at the point of water supply discharge measured (1) diameter of a circle, (2) if the opening is not a circle of equivalent cross-sectional area also to air gap.)

Existing work is a plumbing system or any part installed prior to the effective date of this Code.

- F -

A fixture branch is a water supply pipe between a fixture and the water distributing pipe.

A fixture drain is the drain from the trap of a fixture that drain with any other drain pipe.

A fixture supply is a water supply pipe connecting the fixture branch.

A fixture unit is a quantity in terms of which the load on the plumbing system of different kinds of fixtures is expressed on some arbitrarily chosen scale.

See Flooded.

The flood level rim is the top edge of a receptacle that overflows.

A fixture is flooded when the liquid therein rises to the flood level rim.

A tank located above water closets, urinals or similar fixtures for the purpose of flushing the useable portion of the fixture.

A flush valve is a device located at the bottom of a fixture for the purpose of flushing water closets and similar fixtures.

Section 108

- G -

(a) **Grade**—Grade is the slope or fall of a line of pipe in reference to a horizontal plane. In drainage, it is usually expressed as the fall in a fraction of an inch (or mm) or percentage slope per foot (or meter) length of pipe.

(b) **Grease Interceptor**—An interceptor of at least 750 gallon capacity to serve one or more fixtures and which shall be remotely located.

(c) **Grease Trap**—A device designed to retain grease from one to a maximum of four fixtures.

4' X 5' X 3' deep  
- H -

Section 109

(a) **Hangers**—See Supports.

(b) **Horizontal Branch**—A horizontal branch is a drain pipe extending laterally from a soil or waste stack or building drain with or without vertical sections or branches, which receives the discharge from one or more fixture drains and conducts it to the soil or waste stack or to the building drain.

(c) **Horizontal Pipe**—A horizontal pipe is any pipe or fitting which is installed in a horizontal position or which makes an angle of not more than forty-five (45) degrees with the horizontal.

(d) **House Drain**—See Building Drain.

(e) **House Sewer**—See Building Sewer.

Section 110

- I -

(a) **Indirect Waste Pipe**—An indirect waste pipe is a pipe that does not connect directly with the drainage system but conveys liquid wastes by discharging into a plumbing fixture, interceptor or receptacle which is directly connected to the drainage system.

(b) **Individual Vent**—An individual vent is a pipe installed to vent a fixture trap and which connects with the vent system above the fixture served or terminates in the open air.

(c) **Industrial Waste**—Industrial waste means any and all liquid or water borne waste from industrial or commercial processes, except domestic sewage.

(d) **Insanitary**—A condition which is contrary to sanitary principles or is injurious to health.

Conditions to which the word "insanitary" shall apply include the following:

- (1) Any trap which does not maintain a proper trap seal.
- (2) Any opening in a drainage system, except where lawful, which is not provided with an approved water-sealed trap.
- (3) Any plumbing fixture or other waste discharging receptacle or device, which is not supplied with water sufficient to flush it and maintain it in a clean condition.
- (4) Any defective fixture, trap, pipe or fitting.
- (5) Any trap, except where in this Code exempted, directly connected to a drainage system the seal of which is not protected against siphonage and back pressure by a vent pipe.
- (6) Any connection, cross-connection, construction or condition, temporary or permanent, which would permit or make possible

**ATTACHMENT E**

**NEW MEXICO ENVIRONMENT DEPARTMENT SUMMARY OF DISCHARGE PLAN  
FOR LEA COUNTY SEPTIC TANK SERVICE**

**(One Sheet)**

GROUND WATER SECTION  
Groundwater Bureau  
Environment Department  
Santa Fe, N.M. 87503  
(505) 827-2900

SUMMARY OF DISCHARGE PLAN

August 09, 1993

DP number: 884 Facility Name: LEA COUNTY SEPTIC TANK SRV.  
Facility Desc: INDUSTRIAL  
Waste Type: INDUSTRIAL  
Discharge / Treatment: EVAPORATION LAGOON / HYDROCARBON  
REMEDICATION

County: LEA ED District: 4 20S 38E Sec. 14.000

Location: SOUTHEAST OF HOBBS Nearest City: HOBBS

Responsible Person: Contact or Consultant Person

E. E. TAYLOR

Title: OWNER

Address: P. O. BOX 703

City, zip: HOBBS NM 88240

Phone: 397-2382

The Ground Water Section staff reviewer is CHRIS WHITMAN .  
Application was received 14-MAY-92 and Public Notice published 21-SEP-92 .  
The plan was approved 09-AUG-93 and expires 09-AUG-98 .  
(Application for renewal should be submitted in ample time before expiration.)

MONITORING REQUIREMENTS SUMMARY

No. of monitoring reports required annually: 2  
Monitoring reports are due no later than: 01-FEB and 01-AUG of each year.

<u>Sampling required</u>	<u>Annual freq.</u>	<u>No of sites</u>	<u>Comments, description</u>
Disch. Vols	2	1	VOLUME DISCHARGED TO EACH POND, SEMI-ANNUALLY.
Organics	1	1	SAMPLES TESTED FOR PURGEABLE ORGANICS BY EPA METHOD 810 AND 8020 YEARLY FOR EACH POND IN USE.
Manifest	2	1	MANIFEST, SEMI-ANNUALLY. EACH TRUCKLOAD SHALL HAVE RECORDED: date of delivery, name of discharging facility(ies), amount and type of waste discharged, pond receiving discharge- -Recorded as delivered, reported 2X/yr.

\_\_\_\_ If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet. Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.

Send monitoring reports to the address at top, "Attention: CHRIS WHITMAN

**ATTACHMENT F**

**E & E ENTERPRISES NONHAZARDOUS WASTE MANIFEST  
FOR COBRA'S USED OIL**

**(One Sheet)**

**E P A MANIFEST RECORD  
NON-HAZARDOUS  
WASTE MANIFEST**

CUSTOMER INVOICE  
NO. 27057

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087

E & E ENTERPRISES  
P.O. Box 683  
Brownfield, TX 79316

Please print or type.

<b>GENERATOR'S MAILING ADDRESS</b>	<b>PICK-UP LOCATION</b>	<b>ACCOUNT</b>
<u>Cobra Industries INC</u>		NO: _____
<u>720</u>	<u>S. Texaco ST.</u>	P.O. NO. _____
<u>Hobbs NM</u>		EPA ID NO. _____
<b>GENERATOR'S PHONE NO.</b> <u>(505) 393-1491</u>		

**DESCRIPTION OF NON-HAZARDOUS WASTE:**

Type of Waste (Include US DOT Shipping Name, Hazard Class, and ID Number, if applicable)	QUANTITY	Type QTY*	Unit Cost	Total Cost
NON-HAZARDOUS USED OIL	750	G	N/C	
NON-HAZARDOUS USED OIL FILTERS				
USED ANTI-FREEZE				

\*G=Gallons; P=Pounds; T=Tons; D=Drums TOTAL CHARGE \$

Additional Descriptions of Materials, if necessary

Special Handling Instructions and Additional Information

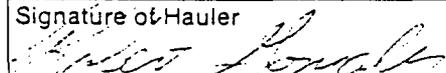
**GENERATOR CERTIFICATION:** I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.

Print Name of Generator <u>Charles A. Landrum</u>	Signature of Generator 	MO. DAY YR. <u>11 10 91</u>
--	--	--------------------------------

**DESIGNATED FACILITY: TRANSPORTER, STORER AND TREATOR OF MATERIALS**

<b>E &amp; E ENTERPRISES</b>	Phone: (806) 637 9336	US EPA ID NO TXD 982 75 6868
P.O. Box 683	1-800-658-2137	TWC Permit NO 41398
Brownfield, TX 79316	(TWC: (512) 463 7727)	TX RR NO 000013747C

**Transporter Acknowledgement of Receipt of Materials**

Print Name of Hauler <u>Robert Landrum</u>	Signature of Hauler 	MO. DAY YR. <u>11 10 91</u>
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Discrepancy Space

**Facility Certification of Receipt of Materials Covered by this Manifest (except as noted above)**

Print Name of Facility Operator	Signature of Facility Operator	MO. DAY YR.
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**ATTACHMENT G**

**MATERIAL SAFETY DATA SHEET FOR VARSOL (MINERAL SPIRITS)**

**(Three Sheets)**

MATERIAL SAFETY DATA SHEET

*Keeling*



000025

MINERAL SPIRITS NONEXEMPT

PAGE: 1

THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (THE HAZARD COMMUNICATION STANDARD)

PRODUCT NAME: MINERAL SPIRITS NONEXEMPT  
CAS NUMBER: 8052-41-3

*Nasol*

KEELING PETROLEUM  
ATTN: ALFRED KEELING  
P. O. BOX 2566  
HOBBS, NM 88240-2566

05 87 090 2102456-665  
DATA SHEET NO: 0000589-003  
LATEST REVISION DATE: 03/86-8606J  
PRODUCT:  
INVOICE: REGST  
INVOICE DATE: 09/02/87  
TO:

SECTION I-PRODUCT IDENTIFICATION

GENERAL OR GENERIC ID: ALIPHATIC HYDROCARBON  
DOT HAZARD CLASSIFICATION: COMBUSTIBLE (173.115)

SECTION II-COMPONENTS

IF PRESENT, IARC, NTP AND OSHA CARCINOGENS ARE IDENTIFIED IN THIS SECTION  
SEE DEFINITION PAGE FOR CLARIFICATION

INGREDIENT	% (BY WT)	NOTE
ALIPHATIC PETROLEUM DISTILLATES CAS #: 8052-41-3	100 PEL: 500 PPM	( 1) TLV: 100 PPM

( 1): NIOSH RECOMMENDS A LIMIT OF 350 MG/CUM - 8 HOUR TIME WEIGHTED AVERAGE, 1800 MG/CUM AS DETERMINED BY A 15 MINUTE SAMPLE.

THIS COMPONENT MAY CONTAIN 3.5% PSEUDOCUMENE(1,2,4 OR 1,2,5-TRIMETHYLBENZENE) CAS# 95-63-6 AND 0.4% MESITYLENE(1,3,5-TRIMETHYLBENZENE) CAS# 108-67-8.

SECTION III-PHYSICAL DATA

PROPERTY	REFINEMENT	MEASUREMENT
BOILING POINT	FOR PRODUCT	300.00 DEG F ( 148.88 DEG C) 3 760.00 MMHG
VAPOR PRESSURE	FOR PRODUCT	2.00 MMHG 3 68.00 DEG F ( 20.00 DEG C)
SPECIFIC VAPOR DENSITY	AIR = 1	4.9
SPECIFIC GRAVITY		0.780 3 15.55 DEG F ( 15.55 DEG C)
PERCENT VOLATILES		100.00%
EVAPORATION RATE	(ETHER = 1)	70.00

SECTION IV-FIRE AND EXPLOSION INFORMATION

FLASH POINT ( 100.0 DEG F  
( 37.8 DEG C)

EXPLOSIVE LIMIT (PRODUCT) LOWER - 1.0%

EXTINGUISHING MEDIA: REGULAR FOAM OR CARBON DIOXIDE OR DRY CHEMICAL

HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS, CARBON DIOXIDE AND CARBON MONOXIDE, VARIOUS HYDROCARBONS, ETC.

FIREFIGHTING PROCEDURES: WEAR SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN PRESSURE-DEMAND OR OTHER POSITIVE PRESSURE MODE WHEN FIGHTING FIRES.

SPECIAL FIRE & EXPLOSION HAZARDS: VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND IGNITED BY HEAT, PILOT LIGHTS, OTHER FLAMES AND IGNITION SOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT.

NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

NFPA CODES: HEALTH- 1 FLAMMABILITY- 2 REACTIVITY- 0

SECTION V-HEALTH HAZARD DATA

PERMISSIBLE EXPOSURE LEVEL 500 PPM  
THRESHOLD LIMIT VALUE 100 PPM

EFFECTS OF ACUTE OVEREXPOSURE, FOR PRODUCT

EYES - CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, BLURRED VISION.  
SKIN - PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, DERMATITIS.


**MATERIAL SAFETY  
DATA SHEET**

24-HOUR EMERGENCY TELEPHONE (606) 324-1133

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MINERAL SPIRITS NONEXEMPT

PAGE: 2

 -----  
 SECTION V-HEALTH HAZARD DATA (CONTINUED)  
 -----

BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, CENTRAL NERVOUS SYSTEM EFFECTS INCLUDING DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE AND POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION. SWALLOWING - CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

 -----  
 FIRST AID:  
 -----

IF ON SKIN, THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING. LAUNDRY CONTAMINATED CLOTHING BEFORE RE-USE.

IF IN EYES, FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

IF SWALLOWED, DO NOT INDUCE VOMITING, KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

IF BREATHED, IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET AND GET MEDICAL ATTENTION.

 -----  
 PRIMARY ROUTE(S) OF ENTRY:  
 -----

INHALATION

SKIN CONTACT

 -----  
 EFFECTS OF CHRONIC OVEREXPOSURE; FOR PRODUCT  
 -----

OVEREXPOSURE TO THIS MATERIAL (OR ITS COMPONENTS) HAS BEEN SUGGESTED AS A CAUSE OF THE FOLLOWING EFFECTS IN HUMANS; CENTRAL NERVOUS SYSTEM EFFECTS

 -----  
 SECTION VI-REACTIVITY DATA  
 -----

HAZARDOUS POLYMERIZATION; CANNOT OCCUR

STABILITY; STABLE

INCOMPATIBILITY; AVOID CONTACT WITH; STRONG OXIDIZING AGENTS.

 -----  
 SECTION VII-SPILL OR LEAK PROCEDURES  
 -----

 -----  
 STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED;  
 -----

SMALL SPILL; ABSORB LIQUID ON PAPER, VERMICULITE, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND TRANSFER TO HOOD.

LARGE SPILL; ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES INCLUDING PILOT LIGHTS, ELECTRICAL SPARKS). PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED. STOP SPILL AT SOURCE, DIKE AREA OF SPILL TO PREVENT SPREADING, PUMP LIQUID TO SALVAGE TANK. REMAINING LIQUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND SHOVELED INTO CONTAINERS. PREVENT RUN-OFF TO SEWERS, STREAMS OR OTHER BODIES OF WATER. IF RUN-OFF OCCURS, NOTIFY PROPER AUTHORITIES AS REQUIRED, THAT A SPILL HAS OCCURED.

 -----  
 WASTE DISPOSAL METHOD;  
 -----

SMALL SPILL; ALLOW VOLATILE PORTION TO EVAPORATE IN HOOD. ALLOW SUFFICIENT TIME FOR VAPORS TO COMPLETELY CLEAR HOOD DUCT WORK. DISPOSE OF REMAINING MATERIAL IN ACCORDANCE WITH APPLICABLE REGULATIONS.

LARGE SPILL; DESTROY BY LIQUID INCINERATION. CONTAMINATED ABSORBENT MAY BE DEPOSITED IN A LANDFILL IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.

 -----  
 SECTION VIII-PROTECTIVE EQUIPMENT TO BE USED  
 -----

RESPIRATORY PROTECTION; IF TLV OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MSHA JOINTLY APPROVED AIR SUPPLIED RESPIRATOR IS ADVISED IN ABSENCE OF PROPER ENVIRONMENTAL CONTROL. OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MSHA RESPIRATORS UNDER SPECIFIED CONDITIONS. (SEE YOUR SAFETY EQUIPMENT SUPPLIER), ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

VENTILATION; PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST) VENTILATION TO MAINTAIN EXPOSURE BELOW TLV(S).

PROTECTIVE GLOVES; WEAR RESISTANT GLOVES SUCH AS; NITRILE RUBBER

EYE PROTECTION; CHEMICAL SPLASH GOGGLES IN COMPLIANCE WITH OSHA REGULATIONS ARE ADVISED, HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

OTHER PROTECTIVE EQUIPMENT; TO PREVENT REPEATED OR PROLONGED SKIN CONTACT, WEAR IMPERVIOUS CLOTHING AND BOOTS.

**MATERIAL SAFETY  
DATA SHEET**

24-HOUR EMERGENCY TELEPHONE (606) 324-1133

000025

MINERAL SPIRITS NONEXEMPT

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-----  
SECTION IX-SPECIAL PRECAUTIONS OR OTHER COMMENTS  
-----

CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED, SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THE DATA SHEET MUST 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 TO THEIR CIRCUMSTANCES.

**ATTACHMENT H**

**COBRA'S TOXICITY CHARACTERISTIC LEACHING  
PROCEDURE LEAD ANALYSIS OF SPENT SANDBLAST MEDIA**

**(Two Sheets)**

"Don't Treat Your Soil Like Dirt!"

October 11, 1994

Client: Cobra Industries, Inc.  
Mr. Mike McDermott  
P.O. Box 2040  
Hobbs, NM 88241-2040

Sample Matrix: Spent Sand Blast Media

Job ID: Sand Blast Media Testing  
Date Received: 10/10/94  
Analysis Date: 10/11/94

## CHEMICAL ANALYSIS REPORT

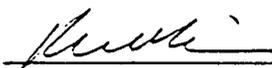
Parameter	Value	Units	EPA SW-846 Test Method
Sample ID: Cobra (1)			7420/1311
TCLP Lead	0.16	ppm	
Sample ID: Cobra (2)			
TCLP Lead	0.20	ppm	
Sample ID: Cobra (3)			
TCLP Lead	0.84	ppm	

EPA Limit for TCLP Lead = 5.0 ppm

### QC (Quality Control)

TCLP Lead QC: 2.0 ppm  
Detection Limit 0.1 ppm

Result	% IA
TCLP Lead 2.02 ppm	100

  
Kirk Robinson



RECEIVED

Aug 10 1958

Outgoing Division  
Department of State